



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco, California**

October 8, 2010

Sent via Electronic Mail Only

RE: Site-wide Indoor Air Sampling and Analysis Work Plan for the Vapor Intrusion Study Area;
MEW Superfund Study Area, Mountain View and Moffett Field, California

Dear MEW 106 Order and Consent Decree Parties, Navy, and NASA representatives (Parties):

In August 2010, the U.S. Environmental Protection Agency (EPA) issued an amendment to the 1989 Record of Decision to address the vapor intrusion pathway (Vapor Intrusion ROD Amendment)¹ at the Middlefield-Ellis-Whisman (MEW) Superfund Study Area (MEW Site) in Mountain View and Moffett Field, California. As you know, EPA is meeting with the Parties on October 27, 2010 to discuss the next steps in implementation of the vapor intrusion remedy. An integral part of the vapor intrusion remedy is determining the appropriate response action required as described in the Vapor Intrusion ROD Amendment.

During the Supplemental Remedial Investigation for the Vapor Intrusion Pathway, many existing commercial buildings within the Vapor Intrusion Study Area² were sampled to assess whether a response action was needed to address the vapor intrusion pathway in each of these buildings. However, there are many buildings that have not yet been sampled and others that need additional sampling to determine the appropriate response action in accordance with the Vapor Intrusion ROD Amendment. Therefore, EPA requests the Parties submit an updated Site-wide Indoor Air Sampling and Analysis Work Plan (Revised Work Plan) for existing buildings within the Vapor Intrusion Study Area by Wednesday, November 10, 2010.

The Vapor Intrusion ROD Amendment utilizes a response action tiering system for existing commercial and residential buildings sampled in the Vapor Intrusion Study Area (see Vapor Intrusion ROD Amendment, Tables 6A and 6B). To determine the appropriate response action and corresponding tier for each existing building, each building is evaluated using results from building surveys, walk-throughs, and inspections; interviews; indoor air sampling; subsurface sampling; and other lines of evidence. Sampling results and other lines of evidence guide the determination of the appropriate response action for each building. Note that there are two indoor air sampling scenarios: sampling with a passive or active engineering control in place or operating (Table 6A) and sampling without an engineering control in place or operating (Table 6B). A minimum of one round of sampling should be conducted using the Table 6B scenario (No Engineering Control in Place or Operating), where possible. Under the Table 6B scenario, the engineering control (e.g., active ventilation system, HVAC system) should be turned off during sampling and for a minimum of 48 hours beforehand. Where sampling is conducted under the Table 6A scenario (Sampling with Passive or Active Engineering Control in Place or

¹ EPA's August 2010 Vapor Intrusion ROD Amendment can be found on EPA's website for the MEW Site at www.epa.gov/region9/mew.

² The Vapor Intrusion Study Area is generally defined as the area where trichloroethene (TCE) in shallow groundwater is greater than 5 micrograms per liter ($\mu\text{g/L}$) or parts per billion (ppb).

Operating), note that the response action will necessarily include continued operations, maintenance, and monitoring of the appropriate engineered remedy and institutional controls.

Attached is a list of existing commercial buildings that have not been sampled within the Moffett Field Area by building number and within the MEW Area by street address. Based on information provided to EPA by the Parties, the list also identifies those buildings that are currently occupied and have not been sampled since sampling began in 2003. These un-sampled, occupied buildings are the highest priority for sampling in this Work Plan. The first round of sampling of these priority buildings should be completed within 30 days of EPA approval of the Revised Work Plan. All sampling of existing commercial buildings within the Vapor Intrusion Study Area should be completed and the response action tier for each building determined by May 2011.

The Revised Work Plan should include a schedule for sampling all remaining buildings within the Moffett Field Area and MEW Area including both occupied and unoccupied buildings that have not been sampled and any building that needs further sampling to determine the appropriate response action. Note that any unoccupied commercial building that has not been sampled since 2003 will have to be sampled to determine the appropriate response action prior to building occupancy.

In addition, the Revised Work Plan should update the roles and responsibilities, sampling design and strategies for different types of buildings and conditions, indoor air ventilation system (e.g., HVAC) operations, and laboratory and field methodologies and analytical methods.

Please contact me if you have any questions regarding this letter.

Sincerely,



Alana Lee
Project Manager
Superfund Division

Attachments: List of Buildings within Vapor Intrusion Study Area that Have Not Been Sampled –
Moffett Field Area and MEW Area