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**BASE REALIGNMENT AND CLOSURE**  
**PROGRAM MANAGEMENT OFFICE**  
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Ser BPMO/0013  
April 8, 2013

Mr. James Alwyn  
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**SUBJECT: NASA AMES COMMENTS ON THE DRAFT FOCUSED FEASIBILITY STUDY, INSTALLATION RESTORATION SITE 29, HANGAR 1, MOFFETT FIELD, SANTA CLARA COUNTY, CALIFORNIA**

The Navy received your letter dated February 28, 2013 with comments regarding the Draft Focused Feasibility Study (FFS) for Installation Restoration (IR) Site 29 (Hangar 1). We will provide responses to these comments along with responses to other stakeholder comments as part of the consultative process for the FFS after all comments have been received. However, I wanted to communicate to you the Navy's disappointment with the stance being taken by NASA Ames Research Center (NASA) regarding the Navy's cleanup actions and our concern with the lack of cooperation in facilitating the successful reuse of Hangar 1.

The Navy transferred the former Naval Air Station Moffett Field in 1994 at no-cost to NASA to support its mission needs. While NASA has reaped innumerable benefits from the facilities for many years, the Navy has continued the environmental cleanup of Navy sites and has spent \$200M to date in advancing the environmental sites toward the Operation and Maintenance (O&M) stage. It is disconcerting that NASA continues to disregard its commitment to assume O&M responsibilities as documented in NASA's May 26, 2009 letter from Ms. Olga Dominguez to the former Assistant Secretary of the Navy (Installations and Environment), Mr. BJ Penn.

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process began for Hangar 1 in 1999, following the discovery of polychlorinated biphenyls (PCBs) in storm water samples. Since then, the Navy has worked diligently with the regulatory agencies, community, and NASA to ensure the long-term protectiveness of human health and the environment at Hangar 1, and to support the requests of the community and NASA to preserve Hangar 1 for future reuse.

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NASA's February 28 comments do not accurately reflect the coordination between Navy and NASA prior to this point in the CERCLA cleanup process. NASA's involvement throughout the cleanup process is noted in the CERCLA administrative record, which includes documentation of the prior coordination with the California State Historic Preservation Office and the Advisory Council on Historic Preservation, an Engineering Evaluation/Cost Analysis (EE/CA), and an Action Memo (CERCLA decision document). This record documents the careful consideration of removal action alternatives and selection of a non-time critical removal action (NTCRA) to mitigate the release of PCBs from Hangar 1 by requiring removal and disposal of the contaminated siding, demolition and removal of interior structures and application of a weather-resistant coating to the structural steel frame.

As detailed in the EE/CA, sampling of building materials was completed for Hangar 1 and the data clearly demonstrate that the overwhelming majority of contamination originated in the corrugated siding and to a lesser degree the building materials (roofing sealant, interior buildings, etc.). As previously stated, all of these materials were carefully removed and properly disposed of as part of the NTCRA. The only residual contamination is fixed within the matrix of interior paint on the structural steel and a few concrete surfaces that remain at Hangar 1. These areas have been encapsulated using Carbomastic 15 (CM15). Although CM15 is a weather resistant epoxy coating, the longevity and protectiveness of the NTCRA would be enhanced if NASA promptly resides the hangar for reuse.

In order to complete the CERCLA process, the Navy is now preparing the FFS to support a final remedial action decision regarding institutional controls (ICs) that are necessary for long-term management of the CM15 coating and the long-term integrity of the NTCRA. After the finalization of the FFS, the preferred final remedial action alternative will be presented for public comment in a Proposed Plan prior to a final remedial action decision being documented in a Record of Decision. If ICs are selected as the final remedial action, we believe the regulatory agencies will concur that all necessary response actions have been taken at Hangar 1.

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The Navy is pleased to see that the U.S. General Services Administration has issued a Notice of Intent on behalf of NASA, indicating that a Request for Proposal (RFP) will be issued in Spring 2013, "seeking a qualified lessee to provide for the rehabilitation and adaptive reuse of historic Hangar One". The Navy applauds NASA's decision to make the hangar available for productive reuse. It is imperative that the long-term O&M requirements for Hangar 1 be properly addressed in the RFP and any lease agreement, along with all other environmental requirements, in order to meet Government objectives for assuring environmental compliance.

If you have any questions regarding this letter, please contact Mr. Scott Anderson, BRAC Environmental Coordinator, at (619) 532-0938 or Mr. Alan Lee, Base Closure Manager, at (619) 532-0905.

Sincerely,

  
LAURA DUCHNAK

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