



November 5, 2010

Reply to Attn of: JQ/237-14

Mr. Jared Blumenfeld  
Administrator  
U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA, 94105

Dear Mr. Blumenfeld:

NASA Ames Research Center is concerned that the delay in remediation by the Navy and MEW Companies at Moffett Field north of U.S. Highway 101 and in the "MEW Area" south of U.S. 101 will have very wide negative effects, increasing risk to human health and the environment in the South Bay and thus also increasing liability to the Federal government. For example:

1. The contamination from the Regional Groundwater Plume has begun to affect NASA's ability to discharge storm water into the Don Edwards National Wildlife Refuge, Cargill's brine channel, Lockheed Martin's storm water channel, the Santa Clara Valley Water District holdings, and the City of Sunnyvale's property
2. The plume itself will eventually migrate downgradient and affect some of these lands and waters and ultimately the Bay, increasing the risk to human health and the environment, and thus the liability for the Federal government.
3. As Bay water levels rise due to climate change, the groundwater table may rise due to changes in the hydrologic conditions. The contamination may reverse direction at some point or flow laterally, affecting more buildings and properties. An increase in groundwater elevation is likely to increase the number of buildings that are subjected to vapor intrusion.
4. Further, an earthquake, such as the 6.2 magnitude or greater earthquake predicted by U.S. Geological Survey within 30 years, may redistribute the contamination and affect yet other lands, waters, and facilities.

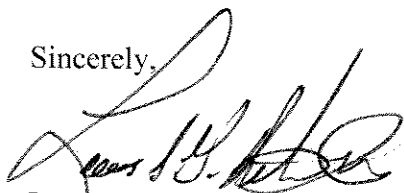
NASA Ames has been stepping up for the past 10 years to conduct vapor intrusion sampling and implement remedies given the Navy's refusal to do so. Looking to the future, NASA cannot be expected to absorb the majority of the burden. As EPA has stated in interagency

meetings with the Navy and Army, EPA does not expect agencies to be responsible for sources they did not create. We, therefore, request EPA support in obtaining commitments from the Navy and MEW Companies to accelerate their clean up activities.

In response to the October 20, 2010, letter from the Navy to the EPA, NASA Ames Research Center requests that your office take specific and actionable additional steps to assure that the Navy and MEW Companies aggressively remediate their portions of the Regional Groundwater Plume. NASA Ames maintains that the Navy is responsible for sampling and addressing vapor intrusion impacts to all buildings of the former Naval Air Station Moffett Field located over the Regional Groundwater Plume. This position is based, in part, on the Navy's refusal to sign an allocation agreement with the MEW Companies concerning contamination sources on the former NASMF. We also request similar commitment from the Army with respect to the Orion Park plume that is migrating onto Ames and will eventually result in additional vapor intrusion mitigation for NASA.

NASA Ames is downgradient of both Navy and MEW sources of groundwater contamination to the regional plume. The MEW companies and the Navy, by not completely capturing contamination from upgradient sources, are unduly impeding NASA's ability to remediate its portion of the groundwater contamination. The number of affected buildings will likely increase due to the continued migration of contaminated groundwater, therefore increasing the number of buildings requiring mitigation, e.g., new or upgraded HVAC systems or subsurface barriers and ventilation systems, and escalating NASA's costs. Further, due to the presence of fuel-related soil and groundwater contamination from Navy releases on the former NASMF, the chlorinated solvents (trichloroethylene (TCE) and perchloroethylene (PCE)) are breaking down into vinyl chloride, which is more toxic and a carcinogen. Every NASA dollar spent to address Navy and MEW contamination is one less dollar available to accelerate NASA's remediation of its own contamination sources.

Sincerely,



Lewis S. G. Braxton III  
Deputy Center Director

cc:

ARCJ:200-9\Ms. Deb Feng  
ARCJQ:237-14\Dr. Ann Clarke  
HQ\4G74\Ms. Olga M. Dominguez  
HQ\4G74\Dr. James Wright  
HQ\5E39\Mr. James Leatherwood  
EPA\Mr. Michael Montgomery  
EPA\Mr. John Chestnut  
EPA\Ms. Alana Lee  
Navy\Mr. Scott D. Anderson  
RWQCB\Ms. Elizabeth Wells