

1.0 INTRODUCTION

This Engineering Evaluation/Cost Analysis (EE/CA) addresses the containment and/or removal of sources of polychlorinated biphenyls (PCBs) from Hangar 1 at the former Naval Air Station (NAS) Moffett Field (Moffett), California. The EE/CA evaluates a broad range of removal action alternatives and identifies the proposed response for conducting a Non-Time-Critical Removal Action (NTCRA) at this site. This EE/CA is prepared on behalf of the Navy's Base Realignment and Closure (BRAC) Program Management Office (PMO) West. This work is conducted under Contract Task Order No. 0068, issued under Remedial Action Contract No. N68711-98-D-5713. The regulatory framework for conducting the NTCRA is described below and followed with a brief outline of the removal action selection process presented in the remainder of this EE/CA.

1.1 REGULATORY FRAMEWORK

The Navy will conduct this NTCRA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The NCP defines removal actions to include:

“...the cleanup or removal of released hazardous substances from the environment; such actions as may necessarily be taken in the event of the threat of release of hazardous substance into the environment; such action as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances; the disposal of removal material; or the taking of such other actions as may be necessary to prevent, minimize or mitigate damage to the public health or welfare of the United States or to the environment, which may otherwise result from a release or threat of release.”

The U.S. Environmental Protection Agency (USEPA) has classified removal actions into three types based on the circumstance surrounding the release or threat of release: emergency, time critical, and non-time critical. The removal action for Hangar 1 at Moffett has been determined to be an NTCRA, in accordance with 40 Code of Federal Regulations (C.F.R), Part 00.415(b)(4)(i), which states:

“(4) Whenever a planning period of at least six months exists before on-site activities must be initiated, and the lead agency determines, based on a site evaluation, that a removal action is appropriate: (i) the lead agency shall conduct an engineering evaluation/cost analysis (EE/CA) or its equivalent. The EE/CA is an analysis of removal alternatives for a site.”

The NTCRA for Hangar 1 is intended to control the release of PCBs contained within the structure or remove these contaminants. PCBs, specifically Aroclor-1260 and Aroclor-1268, are the contaminants of concern (COCs) for this NTCRA. PCBs are probable human carcinogens and ecological toxins. PCBs that are specifically associated with Hangar 1 were discovered in

water and sediment samples taken from the stormwater collection system, which originates in the area surrounding Hangar 1, as well as from the stormwater settling basin at Site 25. These investigations led to the conclusion that the siding material on Hangar 1 was a source of the PCB contamination. Because of the immediate threat posed by the COCs, the Navy performed a Time-Critical Removal Action (TCRA) at Hangar 1 in October 2003 (Tetra Tech FW, Inc. [TtFW], 2004). The Navy's TCRA included covering the exterior siding with an asphalt-emulsion coating that has a warranty of approximately 3 to 5 years. The Navy's TCRA was considered a short-term removal action until a long-term environmental response is provided. Therefore, the proposed NTCRA addresses the source of the Hangar 1 contaminants and provides an effective long-term removal action.

This EE/CA provides the basis for the selection of a CERCLA NTCRA for Hangar 1. The Navy is the lead agency for the Hangar 1 removal action and, as the lead agency, the Navy will select an alternative at the conclusion of the public participation activities. The USEPA and the San Francisco Bay Regional Water Quality Control Board (Water Board) have provided technical advice and oversight during the investigation and preparation of this EE/CA.

It should also be noted that this removal action is not addressing 1) potential releases to groundwater, because the data previously collected indicate there have been no impacts on groundwater; 2) adjacent structures and soils, because they are outside the scope of this NTCRA; 3) contamination in or below the concrete foundation, because the foundation will be left in place and there are no indications that it is contaminated; or 4) institutional controls, because they are outside the scope of this NTCRA.

On May 5, 2006, a previous version of the EE/CA was issued by the Navy. The Navy has decided to issue a revised EE/CA for Hangar 1 (Site 29) at Moffett and seek additional public comment. This decision to revise the EE/CA is based on concerns expressed by the public in review of the EE/CA published on May 5, 2006, and new information received by the Navy. The public is encouraged to review and comment on the proposed removal activities described in this EE/CA. There will be a comment period of at least 30 days at the time this EE/CA becomes available to the public. An Action Memorandum (AM) on the removal alternative that takes into account regulatory and public comments will be prepared based on this EE/CA. The AM will provide a written decision to select an appropriate removal action. The AM substantiates the need for a removal action, identifies the proposed action, and explains the rationale for the removal action selection. To gain a more thorough understanding of the activities associated with this removal action, the public is encouraged to review pertinent documentation at the information repository for this activity available at the following location:

Mountain View Public Library
585 Franklin Street
Mountain View, CA 94041
650-903-6337

The Navy has conducted community relation activities, including regular Restoration Advisory Board (RAB) meetings, site tours, open house information sessions, and distribution of information update mailers to the community. The Navy contacts for this project are Mr. Darren Newton, BRAC PMO West, BRAC Environmental Coordinator, 619-532-0963, and Ms. Melanie Ault, BRAC PMO Coordinator, 619-532-0768.

The complete Administrative Record for this site is located at 1220 Pacific Highway, San Diego, California, and is maintained by Ms. Diane Silva, 619-532-3676, Naval Facilities Engineering Command, Southwest.

1.2 EE/CA ORGANIZATION

This EE/CA utilizes the *Guidance on Conducting Non-Time-Critical Removal Actions under CERCLA* (USEPA, 1993) and the pertinent Navy guidelines provided under the Installation Restoration Program (IRP). The remainder of this EE/CA is organized as follows:

- Section 2.0 provides the historical background on Hangar 1, the results of previous investigations and removal actions, and the nature and extent of contamination at the site.
- Section 3.0 develops the removal action objective (RAO) for this NTCRA and describes the removal scope, schedule, and the applicable or relevant and appropriate requirements (ARARs).
- Section 4.0 identifies a broad range of removal action alternatives and includes a detailed evaluation of these alternatives in terms of their implementability and effectiveness.
- Section 5.0 provides a comparative analysis of the removal action alternatives that were retained for further evaluation, based on implementability, effectiveness, and cost.
- Section 6.0 identifies the recommended removal action alternative for Hangar 1 following the EE/CA process described in Sections 3.0, 4.0, and 5.0.
- Section 7.0 is a list of references cited in this EE/CA.

This EE/CA also includes four appendices, which provide supporting documents for Hangar 1 material specifications, the laboratory test results for Hangar 1 siding material, the cost detail for the alternatives, and the response to comments on the EE/CA dated May 5, 2006.

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