



Proposed Plan for Hangar 1 Former Naval Air Station Moffett Field Site 29



Mountain View, California

July 2013

U.S. NAVY PROPOSES IMPLEMENTATION OF INSTITUTIONAL CONTROLS FOR HANGAR 1

The U.S. Navy (Navy) is requesting public comments on its Proposed Plan for implementation of institutional controls at Site 29 (Hangar 1), located at the former Naval Air Station (NAS) Moffett Field. The Navy is making this request in cooperation with the U.S. Environmental Protection Agency – Region 9 (EPA) and the San Francisco Bay Regional Water Quality Control Board (Water Board).

This Proposed Plan summarizes information detailed in the Focused Feasibility Study (FFS) for Installation Restoration (IR) Site 29 (Hangar 1) and announces the Navy’s preferred remedial alternative for Hangar 1. The Proposed Plan is part of the Navy’s public participation responsibilities under Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Section 300.430(f)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

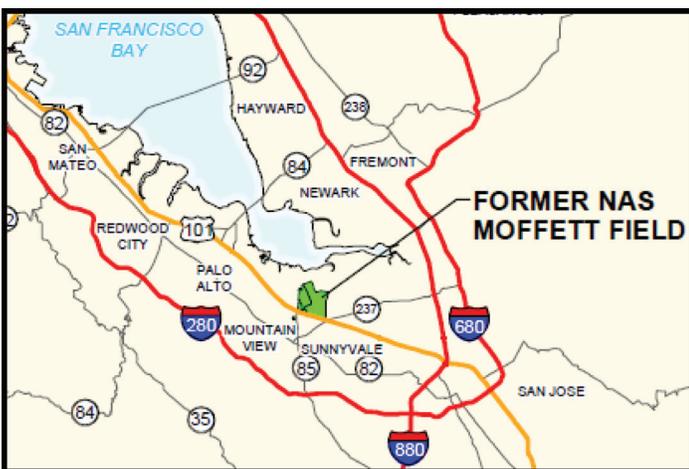


Figure 1. Site Location Map

NOTICE

**Proposed Plan
Public Comment Period
July 29 – August 30, 2013**

**Public Meeting
August 22, 2013
266 Escuela Ave.**

Mountain View, CA 94040

**6:30 – 7:30 p.m. Quarterly RAB
Meeting**

**7:30 – 9:00 p.m. Hangar 1
Public Meeting**

Alternative 2, Implementation of Institutional Controls, is the Navy’s preferred alternative. In consultation with the regulatory agencies, the Navy may modify the preferred alternative or select another remedial action based on feedback from the community or on new information.

Therefore, the community is strongly encouraged to review and comment on the Proposed Plan. A final decision will not be made until all comments received during the public comment period are considered.

FACILITY HISTORY

Former NAS Moffett Field is a Federal airfield located 30 miles southeast of San Francisco and 10 miles northwest of San Jose, in Mountain View, California.

Former NAS Moffett Field was commissioned as NAS Sunnyvale in 1933 to support the West Coast dirigibles for the Lighter-Than-Air program. In 1935, NAS Sunnyvale was transferred to the U.S. Army Air Corps. In 1939, the National Advisory Committee for Aeronautics, the predecessor to NASA, established Ames Aeronautical Laboratory on land northwest of Moffett Field, which later became NASA Ames Research Center. Naval Air Station Sunnyvale was returned to Navy control in 1942 and was renamed NAS Moffett Field.

Environmental restoration activities began at Moffett Field in 1983 as part of the Navy's Installation Restoration Program (IRP). Under the IRP, the Navy is responsible for assessing, investigating and responding to releases of hazardous substances that present a potential risk to human health and the environment. All of the sites identified through the IRP were investigated, and many have been closed.

Moffett Field was placed on the National Priorities List (NPL) in 1987. The NPL is a list of national priorities among the known releases or threatened releases of hazardous substances, pollutants or contaminants throughout the United States and its territories. The NPL is intended primarily to guide the EPA in determining which sites warrant further investigation. A Federal Facilities Agreement (FFA), or an interagency agreement to govern the cleanup, was signed by the Navy, EPA and the state of California and became effective on Sept. 14, 1990. The responsibilities of the Navy and other parties, with respect to investigation of environmental impacts resulting from past and present activities at Moffett Field, are discussed in the FFA. A framework and schedule for appropriate action in response to such impacts is also outlined in the FFA.

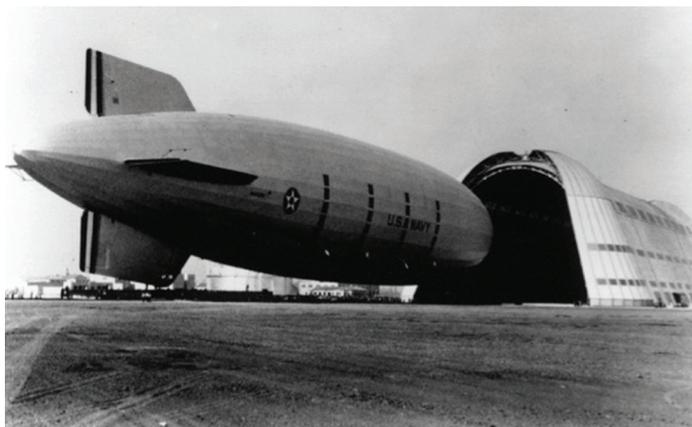


Figure 2. Dirigible at Hangar 1



Figure 3. Hangar 1

In 1992, former NAS Moffett Field was designated for closure as an active military base under the Department of Defense Base Realignment and Closure (BRAC) Program. NASA assumed control of the facility with the exception of military housing in July 1994 and currently is the federal property manager for Moffett Field. Current federal and state agencies located at Moffett Field include the U.S. Department of the Air Force and California Air National Guard. These resident agencies use the federal airport and provide facilities for military personnel and their families, including family housing, a commissary, a military clinic and tennis courts.

SITE DESCRIPTION

Hangar 1 is located west of the flight line at Moffett Field between Sayre and Cummins Avenues. Hangar 1 is a large structure measuring 1,133 feet long, 308 feet wide and 198 feet high. The area surrounding the hangar is paved, with the exception of several small areas of bare soil located on the east side of the hangar. As originally constructed, the hangar consisted of a structural steel frame covered with corrugated siding and a built-up asphalt roof. The interior contained multi-story offices and shops and a concrete floor.

As discussed below, contaminants were detected in the hangar's building materials, including the structural steel frame, roof and corrugated siding.

As part of the Non-Time-Critical Removal Action (NTCRA) for Hangar 1, which was completed in June 2013, all of the hangar's building materials were deconstructed or demolished and the waste

materials were disposed or recycled, leaving a newly epoxy-coated steel frame, door operating mechanisms and concrete slab.

Previous Investigations and Decisions

In 1991, NASA completed construction of a storm water settling basin approximately 2,000 feet northwest of Hangar 1 to limit sediment transport to the eastern diked marsh and storm water retention ponds and reduce contaminant migration. In 1997, during routine cleanout and sampling activities conducted by NASA, a relatively uncommon polychlorinated biphenyl (PCB) mixture, Aroclor-1268, was discovered in sediment in the settling basin.

In 1999, PCBs were detected in a storm water sample collected from a manhole downstream of Hangar 1. Subsequent sampling of storm water and



Figure 4. Location of Hangar 1

SITE DESCRIPTION *Cont.*

sediment performed in 1999 and 2000 failed to detect any PCBs in the storm water management system. PCBs were again detected in storm water samples collected in 2002, and an investigation was undertaken to test the building materials in Hangar 1 for PCBs and other potential contaminants, specifically lead and asbestos. The results of this sample and analysis program confirmed the presence of Aroclor-1260 and Aroclor-1268 in the building materials, with the highest concentrations detected in paint and interior layers of the siding panels.

NASA and the Navy completed Time-Critical Removal Actions (TCRAs) at Hangar 1 as interim measures to address potential threats to human health and the environment associated with elevated concentrations of PCBs in Hangar 1. The NASA TCRA took place in September 2003 and removed contaminated sediment from the storm water collection trench that surrounds the hangar. The Navy completed a second TCRA in October 2003 that involved applying a temporary coating (asphalt emulsion) to the hangar's corrugated siding to prevent migration of PCBs from exterior surfaces of the hangar into the storm water management system.

Subsequent to the TCRAs, the Navy evaluated 13 potential long-term alternatives to mitigate PCB releases from Hangar 1. The results of this evaluation were presented in the Engineering Evaluation/Cost Analysis (EE/CA) dated July 30, 2008. Alternative 10 (Remove Siding and Coat Exposed Surfaces) was selected as the recommended NTCRA alternative with agency concurrence and documented in the Action Memorandum issued by the Navy's BRAC Program on December 31, 2008.

The objective of the NTCRA was to control known PCB contamination at Hangar 1, thereby reducing the potential for negative impacts to human health and the environment from these materials. **The NTCRA, performed from June 2010 to June 2013, consisted of the complete removal of the siding, deconstruction of interior structures, removal of debris to appropriate off-site disposal or recycling facilities, cleaning by high-pressure washing and/or**

other mechanical means and application of a Carbomastic® 15 (CM15) epoxy coating system to the hangar's remaining structural steel frame to encapsulate the PCBs and prevent exposure to these contaminants. As a result of the NTCRA, Hangar 1 currently consists of a concrete floor and stem walls that support the newly coated structural steel frame. Additional actions, which are described in this Proposed Plan, are required to maintain the protectiveness of the epoxy coating.

FOCUSED FEASIBILITY STUDY

A FFS was prepared to evaluate short- and long-term options to ensure the protectiveness of the NTCRA that was performed at Hangar 1. The overall objectives of the FFS were to:

- Develop and evaluate potential alternatives for the long-term management of Hangar 1 that permanently and significantly reduce the threat to public health and the environment;
- Select a cost-effective alternative that mitigates the threat(s); and
- Achieve consensus among the Navy, EPA, and state and local authorities regarding the selected action.

The following two remedial alternatives were evaluated in the FFS:

- Alternative 1: No Action
- Alternative 2: Implementation of Institutional Controls

RISK SUMMARY

In accordance with the NCP, the following factors were considered in assessing the risk factors at the site and determining the appropriateness of a remedial alternative:

- Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances, pollutants or contaminants
- Actual or potential contamination of drinking water supplies or sensitive ecosystems

RISK SUMMARY *Cont.*

- Hazardous substances, pollutants or contaminants in drums, barrels, tanks or other bulk storage containers that may pose a threat of release
- High levels of hazardous substances, pollutants or contaminants in soils largely at or near the surface that may migrate
- Weather conditions that may cause hazardous substances, pollutants or contaminants to migrate or be released
- Threat of fire or explosion
- Other situations or factors that may pose threats to public health, welfare or the environment

Of the above factors, the following applies to conditions at Hangar 1:

- Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.

PCBs are a “pollutant or contaminant” as defined in Section 101(33) of CERCLA. The total PCB levels

remaining on the original interior structural steel paint range from 65 to 214 milligrams per kilogram. The nature of this risk indicates that removal of all interior structures and siding, and containment of the residual paint on structural steel with the CM15 epoxy coating has mitigated the immediate threat to public health. The long-term effectiveness of the coating will require routine maintenance of the coating and monitoring.

REMEDIAL ACTION OBJECTIVES

Remedial Action Objectives (RAOs) are site-specific goals for protecting human health and the environment, and typically address either an exposure pathway and/or a contaminant. The NCP stipulates that RAOs identify chemicals of concern (COCs), exposure pathways, receptors, and an acceptable chemical concentration or range of concentrations for each exposure pathway. RAOs must also comply with federal or state Applicable or Relevant and Appropriate Requirements (ARARs).



Figure 5. Hangar 1

REMEDIAL ACTION OBJECTIVES *Cont.*

The COCs at the site are PCBs, which were present in the hangar roof, siding, interior buildings and as a component of the residual paint on interior structural steel and certain concrete structures.

Identified potential receptors are site workers and wildlife at the site. Currently there are no identified complete pathways for COCs to migrate from the source material to the environment at the site. However, if the epoxy coating on the steel frame breaks down in the future, potential exposure could occur. The threat to terrestrial receptors is through a food chain where worms and other small animals that live in sediments ingest PCBs and then in turn are eaten by other animals, including birds. This results in the bioaccumulation of PCBs in the tissue of these animals. The identified future potential exposure pathways include dermal contact, inhalation, direct and indirect ingestion, and human or ecological exposure to contaminated sediment and surface water runoff at NASA's eastern diked marsh and storm water retention ponds. If the CM15 epoxy coating breaks down in the future, additional action may be needed to prevent the release of COCs. If institutional controls are implemented, then the NTCRA will ensure the continued protectiveness and mitigate ecological risks.

At Hangar 1 the RAO is to prevent unacceptable exposure to PCBs by limiting dermal contact, inhalation of dust particles, and incidental ingestion, thereby minimizing the risks to human health. Also, the RAO is to prevent unacceptable exposure to ecological receptors from contaminated sediment and surface water runoff.

The RAO provides a basis for evaluation of remedial action alternatives and recommendations. In addition, the NCP sets forth three principles to assist in the identification and evaluation of appropriate remedial alternatives:

- The remedy must be protective of human health and the environment.
- The remedy must maintain that protection over time.
- The remedy must minimize untreated waste.

REMEDIAL ACTION ALTERNATIVES

Remedial action alternatives, which were evaluated in the FFS and summarized in this section, were developed to achieve protectiveness either by limiting or eliminating the exposure pathway, and/or reducing contaminant concentrations.

Remedial action is necessary at the site to ensure the NTCRA remedy remains effective. Because the NTCRA remedy included encapsulation of the COCs, hazardous substances will remain in place at Hangar 1 above levels that would allow unlimited use and unrestricted exposure.

Each proposed remedial alternative was screened for effectiveness, implementability and cost (see Table 1 on page 7). The purpose of this screening was to assess alternatives early in the FFS process, and only retain those that met the screening criteria for detailed evaluation.

The following two remedial alternatives were screened:

Alternative 1: No Action

Alternative 2: Implementation of Institutional Controls

These two alternatives are intended to present options for decision makers to consider in the remedy selection process. Alternative 2 is consistent with the planned future use of the property.

REMEDIAL ACTION ALTERNATIVES *Cont.*

Alternative 1 – No Action

Under this alternative, no actions would be taken. It would leave PCBs present at Hangar 1 in their existing state, with no further remedial measures or institutional controls to prevent unacceptable exposure to COCs in the future. No future actions to prevent release of PCBs would be performed, and any future releases would not be mitigated or monitored under this alternative.

Effectiveness: Potentially unacceptable risk to human receptors posed by PCBs at Hangar 1 would exist if the epoxy coating were to degrade. By itself, this alternative would not preclude incidental exposure in that case. Potential risks associated with current and future site use are exposure to COCs underlying the epoxy if the coating were to chip or otherwise degrade.

Implementability: There are no engineering measures required to implement the no action alternative. Therefore, this alternative is considered technically feasible.

Cost: There are no costs associated with this alternative.

Conclusion: This alternative provides a baseline for comparing other remedial alternatives. The evaluation of the no action alternative is required per the NCP under CERCLA.

Alternative 2 – Implementation of Institutional Controls

Institutional controls are non-engineered instruments, such as administrative and legal controls, that help to minimize the potential for exposure to contamination and/or protect the integrity of a response action. Institutional controls typically are designed to work by providing information that guides human behavior at a site or by limiting land and/or resource use. Institutional controls may also include educational media to inform the public of the hazards associated with a

particular site. This media may be in the form of fact sheets and notices distributed to the public, formal educational seminars, and press releases.

Alternative 2 would include implementation of actions necessary to achieve the remedial objectives at Hangar 1 by maintaining the protectiveness of the NTCRA. An epoxy coating inspection and maintenance program would be developed and implemented to prevent deterioration of the CM15 epoxy coating that provides encapsulation of the underlying PCB-contaminated paint at Hangar 1. The CM15 coating would be inspected and maintained as part of the long-term management program.

Table 1. Remedial Alternatives Screening Criteria

Effectiveness – Both short-term (construction and implementation period) and long-term (period after remedial action implementation) effectiveness in protecting human receptors are considered for each alternative.

Implementability – Technical and administrative feasibility of operating and maintaining the remedial alternatives are considered in assessing implementability. Technical feasibility is the ability to construct, operate and meet regulatory expectations until the remedial action is complete, including operation and maintenance. Administrative feasibility is the ability to obtain regulatory approval, availability of storage/disposal and availability of specific equipment and technical specialists. Implementability also includes implementation-related risks associated with specific remedial actions.

Cost – Major cost items are identified for each of the remedial alternatives. Cost items are identified on the basis of costing data, vendor information, engineering judgment and by utilizing Remedial Action Cost Engineering and Requirements software (RACER).

REMEDIAL ACTION ALTERNATIVES *Cont.*

The specific remedial objectives would be identified in the Record of Decision, and the details of the institutional controls would be developed in the implementation stage. Potential institutional controls at Hangar 1 may include, but are not limited to, the following measures:

- Installation and maintenance of signs notifying of the potential exposure hazard
- Administrative arrangements for access for future monitoring/maintenance
- Property owner and tenant commitment to inspection and maintenance of the CM15 epoxy coating
- Sediment sampling to ensure that the coating remains effective
- Regulatory agency review of site development and land use changes
- Regulatory agency approval of any building modifications that might damage the remedy components
- Administrative commitment to incorporate appropriate proprietary restrictions necessary for long-term management and coating maintenance in any property transfer agreements

The site owner and tenant would be responsible for implementing, inspecting, maintaining, reporting and enforcing institutional controls under this remedial alternative. In addition, five-year reviews and reporting would be necessary.

Effectiveness: This remedial alternative would be effective and provide active measures to inspect and maintain the CM15 epoxy coating at Hangar 1. The effectiveness of this alternative is dependent on the administration of site control through the facility management process.

Implementability: Institutional controls are considered implementable.

Cost: Administrative costs would include salaries and legal fees. Additional costs would include periodic inspection and maintenance of the new coating, periodic sediment sampling and five-year reviews for an assumed duration of 30 years.

Conclusion: This alternative is considered a viable remedy to reduce risk to site workers and ecological receptors. It would meet RAOs, but would not remove all COCs at Hangar 1.

EVALUATION OF ALTERNATIVES

As specified in the NCP, nine criteria are used to select the final cleanup remedy (see Table 2 on page 9). This section compares the relative performance of the alternatives retained after the screening process against seven of the nine criteria. The other two criteria, state and community acceptance, will be evaluated after the public comment period and then addressed in the Record of Decision. For this reason, the Navy encourages the public to comment on all alternatives. The Detailed Analysis of Alternatives can be found in the Final FFS report and other site documents in the administrative record file and information repository.

Overall Protection of Human Health and the Environment

Alternative 1 is not considered protective of human health and the environment. No restrictions on land use would be implemented, so actions that could potentially damage the CM15 epoxy coating would not be restricted. Over time, humans and the environment could be exposed to remaining PCBs at Hangar 1, as this alternative has no mechanisms to prevent unacceptable exposure to PCBs.

Alternative 2 is considered protective of human health and the environment. Overall protection of human health and the environment would be maintained during the long-term management activities and by the implementation of institutional controls. The CM15 epoxy coating inspection and maintenance program would ensure that the

EVALUATION OF ALTERNATIVES *Cont.*

CM15 epoxy coating remains protective in the encapsulation of PCBs on the structural steel frame and thereby reduces future risks to human and ecological receptors.

Compliance with ARARs

ARARs do not apply to Alternative 1. The requirement to meet ARARs applies only when a response action is taken. Alternative 1 involves no steps to prevent access to, reduce, remove, contain or treat the COCs at Hangar 1.

Alternative 2 is expected to meet potential chemical-, location-, and action-specific ARARs.

Long-term Effectiveness and Permanence

Alternative 1 is not considered effective in the long-term. Concentrations of PCBs would remain at Hangar 1, with no controls to prevent damage or require repair to the CM15 epoxy coating or unacceptable exposure. Alternative 1 requires no maintenance, long-term management or other actions.

Alternative 2 would implement measures to prevent damage or require repair to the CM15 epoxy coating and it includes inspection and maintenance of the CM15 epoxy coating on areas as needed.

As long as the CM15 epoxy inspections and maintenance are performed as scheduled, and institutional controls are implemented and followed, the long-term effectiveness of Alternative 2 is high. The encapsulating materials require periodic coating maintenance in order to remain protective.

Alternative 2 would result in the generation of greenhouse gases, primarily as a result of transportation of personnel and equipment, and operation of heavy equipment during CM15 epoxy coating inspections, maintenance and waste handling. Greenhouse gases would also be generated during institutional control inspections and sediment monitoring.

Reduction of Toxicity, Mobility, or Volume through Treatment

Alternative 1 does not reduce the toxicity, mobility or volume, as no active treatment would be performed for Alternative 1. The mobility of COCs would be reduced while the encapsulating layer remained intact. Over time, the encapsulating layer could degrade, and the underlying COCs would no longer have restricted mobility.

The mobility of PCBs is controlled by the CM15 epoxy coating encapsulation and management. However, toxicity or volume would not be reduced because there are no active treatment processes associated with Alternative 2.

Table 2. The Navy uses the nine criteria identified in the CERCLA process to evaluate alternatives for cleaning up a hazardous waste site. The nine criteria are as follows:

Threshold Criteria	1	Overall Protection of Human Health and the Environment How the risks are eliminated, reduced, or controlled through treatment, engineering, or institutional controls.	
	2	Compliance with Applicable or Relevant and Appropriate Requirements (ARARs) Federal and state environmental statutes met or grounds for waiver provided.	
	3	Long-term Effectiveness Maintain reliable protection of human health and the environment over time, once cleanup goals are met.	
Primary Balancing Criteria	4	Reduction of Toxicity, Mobility, or Volume (TMV) through Treatment Ability of a remedy to reduce the toxicity, mobility, and volume of the hazardous contaminants present at the site.	
	5	Short-term Effectiveness Protection of human health and the environment during construction and implementation period.	
	6	Implementability Technical and administrative feasibility of a remedy, including the availability of materials and services needed to carry it out.	
	7	Cost Estimated capital, operation, and maintenance costs of each alternative.	
Modifying Criteria	8	State Acceptance State concurs with, opposes, or has no comment on the preferred alternative.	
	9	Community Acceptance Community concerns addressed; community preferences considered	

EVALUATION OF ALTERNATIVES *Cont.*

Short-term Effectiveness

Alternative 1 would not involve any active remedial measures, and the proposed RAO would not be met. There would be no adverse short-term impacts to site workers, surrounding land uses or the environment associated with this alternative.

Alternative 2 could be put in place quickly to prevent unacceptable exposure to PCBs at Hangar 1. Implementation of this alternative would achieve protection and, therefore, achieve the RAO in a short period of time. Implementation of this alternative would not be expected to have adverse effects on onsite workers, the surrounding community, or the environment.

Implementability

Alternative 1 would be easy to implement because it requires no action and is therefore rated high.

There are no challenges to the implementation of Alternative 2. All technologies (inspection and maintenance of coating, institutional controls, and sediment monitoring) required to implement this alternative are commonly implemented at similar sites, can be procured readily and should be compatible with the current and anticipated site use. However, Alternative 2 would be rated medium due to the procedures required to maintain and implement institutional controls.

Cost

There are no direct costs associated with Alternative 1.

The present-value cost for implementation of Alternative 2 is \$5,938,000. Major cost components for this alternative are associated with inspection and maintenance of the CM15 epoxy coating, implementation of institutional controls, monitoring of sediment, and reviews and reporting. For cost-estimating purposes, it is assumed that the duration of the alternative is 30 years. Appendix C of the FFS provides the cost development.

Table 3. Applicable or Relevant and Appropriate Requirements

CERCLA requires that remedial actions meet federal or state (if more stringent) environmental standards, requirements, criteria, or limitations that are determined to be ARARs. Significant potential ARARs that must be met by the preferred remedy are listed below. Refer to the FFS, Appendix A, for more detail.

Chemical-Specific ARARs

Federal

- Clean Water Act of 1977, as Amended (33 U.S.C., ch. 26, §§ 1251–1387); 40 CFR § 131.36(b) and 131.38
- Clean Air Act (42 U.S.C. §§ 7401–7671); BAAQMD Regulation 8, Rule 8-3-301
- Toxic Substances Control Act (15 U.S.C., ch. 53, §§ 2601–2692); 40 C.F.R. § 761.61(a) (4), (b), and (c)

State

- California Water Code, div. 7, §§ 13241, 13243, 13263(a), 13269, and 13360 (Porter-Cologne Act)
- Comprehensive Water Quality Control Plan for the San Francisco Bay (Basin Plan) (California Water Code Section 13240)

Location-Specific ARARs

Federal

- National Historic Preservation Act of 1966, as Amended (16 U.S.C. § 470–470x-6); 16 U.S.C. § 470-470x-6, 36 CFR, Pt. 800
- Migratory Bird Treaty Act of 1972 (16 U.S.C. §§ 703–712); 16 U.S.C. §703 State

State

- No state location-specific ARARs have been identified

Action-Specific ARARs

Federal

- No federal action-specific ARARs have been identified

State

- California Civil Code §1471

PREFERRED ALTERNATIVE

Alternative 2 meets the criteria of overall protection of the environment and compliance with ARARs, while Alternative 1 does not. Alternative 2 satisfies the criteria of long-term effectiveness and permanence; reduction of toxicity, mobility or volume through treatment; short term effectiveness; and implementability.

Table 4. Comparative Analysis Summary for Removal Action Alternatives

Criteria	Alternative 1 No Action	Alternative 2 Implementation of Institutional Controls
Effectiveness		
Overall protection of human health and the environment	No	Yes
Compliance with ARARs	Not applicable	Yes
Long-term effectiveness and permanence	Low Effectiveness	High Effectiveness
Reduction of toxicity, mobility, or volume through treatment	Low effectiveness	High effectiveness
Short-term effectiveness	High effectiveness	High effectiveness
Implementability		
Technical and administrative feasibility	High	Medium
State acceptance	To be evaluated after the agency comment period	
Community acceptance	To be evaluated after the public comment period	
Cost	\$0	\$5.94 million

COMMUNITY PARTICIPATION

The Navy, EPA and Water Board have provided information regarding the cleanup of Hangar 1 to the public through public meetings, the administrative record file for the site and media announcements published in the local newspapers.

The Navy, EPA and Water Board encourage the public to gain a more thorough understanding of the site and the CERCLA activities that have been conducted at former NAS Moffett Field by visiting the information repository, reviewing the administrative record file, attending public meetings, and getting on the mailing list to receive regular project information. In addition, Restoration Advisory Board meetings are held quarterly and are open to the public.

There are two ways for you to provide your comments on this Proposed Plan:

- Public Comment Period – During the public comment period from July 29 through August 30, 2013, you may send written comments to Mr. Scott Anderson at the address listed below.
- Public Meeting – You may also provide written or oral comments during the public meeting on August 22, 2013 that will be held in the Mountain View Senior Center, 266 Escuela Ave., Mountain View, CA 94040. A stenographer will be at the meeting to record all public comments.

After the public comment period is over, the Navy will review and consider comments received before making a final decision on the remedial action alternative to be used at Hangar 1. All site-related documents are available for review in the information repository and administrative record file.

Visit the former NAS
Moffett Field Web page at
<http://www.bracpmo.navy.mil>

RESPONSIVENESS SUMMARY

The Navy will respond to all formal comments received on this Proposed Plan in a document called a Responsiveness Summary. The Responsiveness Summary will be included in the Record of Decision and mailed to all individuals who provide comments during the public comment period. It will also be placed in the information repository and administrative record file.

Administrative Record File

Please call in advance to make an appointment Monday through Friday between 8:30 a.m. and 4:30 p.m.

Contact: Ms. Diane Silva
Administrative Records Coordinator
Naval Facilities Engineering Command, Southwest
1220 Pacific Highway
ATTN: Diane Silva, FISC Building 1, 3rd Floor
San Diego, CA 92132
Phone: 619-556-1280

Information Repository

Mountain View Public Library
585 Franklin St.
Mountain View, CA 94041
Phone: 650-903-6887
Hours: Monday-Thursday: 10 a.m. to 9 p.m.
Friday-Saturday: 10 a.m. to 6 p.m.
Sunday: 1 p.m. to 5 p.m.

FOR MORE INFORMATION

If you have questions about former NAS Moffett Field or Hangar 1, please contact:

Scott Anderson
Base Realignment and Closure Environmental Coordinator
1455 Frazee Road, Suite 900
San Diego, CA 92108
Phone: 619-532-0938
Fax: 619-532-0940
Email: scott.d.anderson@navy.mil

Response to Comments
Draft Final Proposed Plan for Installation Restoration (IR) Site 29 (Hangar 1)
Former Naval Air Station (NAS) Moffett Field, Moffett Field CA

Report Dated: June 28, 2013

Verbal Comments: July 2, 2013

The following are modified responses to comments from the Draft Proposed Plan based on verbal comments from Yvonne Fong, USEPA, during review of the Draft Final Proposed Plan.

#	Reference	EPA Comment	Response
General Comments			
1	General	<p>Responsibility for Implementation of Institutional Controls: The PP includes a bulleted list of measures that may be included as part of the institutional controls (ICs) for Hangar 1. The third bullet is "Property owner and tenant commitment to inspection and maintenance of the CM15 epoxy coating." The responsibility for these long term responsibilities, as well as other measures included in the bulleted list, do not appear to be resolved between the Navy and NASA. Until there is a formal transfer of responsibility for these activities or EPA has an enforceable agreement with NASA, EPA will continue to work with the Navy to ensure the protectiveness provided by the Hangar 1 removal action.</p>	<p>Comment noted. However, in a letter dated May 26, 2009 to the Navy, NASA stated that "To enable Navy's planning for ultimately ending direct involvement in environmental activities at Moffett Field, NASA will assume responsibility for the operations and maintenance of remaining Moffett Field remediation sites after remedial actions are completed at each of those sites as determined by EPA Region 9." The Navy has been relying on NASA's commitment as stated in its May 26, 2009 letter in advancing the environmental cleanup program at former NAS Moffett Field toward the O&M stage. Furthermore, on April 8, 2013, the Director of BRAC PMO responded to NASA's letter of February 28, 2013, reiterating the importance of NASA assuming long term responsibilities for Hangar 1 as committed in NASA's May 26, 2009 letter and that these responsibilities are properly addressed in NASA's Request for Proposal and any lease agreement for the hangar.</p>
2	Specific	<p>Third paragraph, page 1: The left margin of this paragraph is not consistent as the paragraph continues down the length of the page due to the location and size of Figure 1. As this paragraph contains very important information about the Navy's preferred alternative, please revise the formatting of the page to ensure that it does not detract from the text which is presented entirely in bold.</p>	<p>This section has been reformatted: Figure 1 was made smaller to fit in the dimensions of Column 1; A box was placed around this third paragraph to draw more attention to it and signify its importance.</p>

Response to Comments
Draft Final Proposed Plan for Installation Restoration (IR) Site 29 (Hangar 1)
Former Naval Air Station (NAS) Moffett Field, Moffett Field CA
 Report Dated: June 28, 2013
 Verbal Comments: July 2, 2013

The following are modified responses to comments from the Draft Proposed Plan based on verbal comments from Yvonne Fong, USEPA, during review of the Draft Final Proposed Plan.

#	Reference	EPA Comment	Response
3	Specific	Site Description, page 3: Please delete “in the present condition” from the end of the last sentence in this section. It seems repetitive as the beginning of the paragraph states that what is described is the condition of the Hangar at the completion of the NTCRA.	Deleted “in the present condition” from the end of the last sentence in the Site Description section.
4	Specific	Previous Investigations and Decisions, page 4: The partial paragraph at the top of page 4 and the two paragraphs that follow include multiple uses of the word “mitigate.” Please revise the text to use less repetitive language. Other words that would be simpler for the general public include “limit,” “control” and “prevent.”	Replaced first instance of “mitigate” on page 4 with “prevent.” Replaced third instance of “mitigate” with “control.”
5	Specific	Remedial Action Objectives, page 5: The first sentence of the last paragraph in the first column should be revised. Potential receptors are not “ecological risks.” It would be more appropriate to use the phrase “wildlife at the site.”	Replaced “ecological risks” with “wildlife at the site” in the first sentence of the last paragraph in the first column.
6	Specific	Alternative 2 - Implementation of Institutional Controls, Cost, page 8: The Conclusion of this section should be revised to not refer to the Focused Feasibility Study (FFS). Please change the text to “This alternative is considered a viable remedy to reduce risk...”	Deleted “retained for detailed analysis in Section 5 (Page 7) of the FFS. It is” so that the sentence now reads “This alternative is considered a viable remedy to reduce risk to site workers.”
7	Specific	Evaluation of Alternatives, Long-term Effectiveness and Permanence, page 8: The first sentence of the last paragraph on the page needs to be rewritten. It is not clear if “maintenance consumables” and “residual handling” are part of the phrase “operation of heavy equipment.” Changing the punctuation or including a numbered/lettered list may improve the readability of	This sentence has been modified with added punctuation as follows: “Alternative 2 would result in the generation of greenhouse gases, primarily as a result of transportation of personnel and equipment, and operation of heavy equipment during CM15 epoxy coating inspections, maintenance and waste handling.”

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Report Dated: June 28, 2013

Verbal Comments: July 2, 2013

The following are modified responses to comments from the Draft Proposed Plan based on verbal comments from Yvonne Fong, USEPA, during review of the Draft Final Proposed Plan.

#	Reference	EPA Comment	Response
		this sentence.	
8	Specific	Evaluation of Alternatives, Reduction of Toxicity, Mobility, or Volume through Treatment, page 9: Please revise this section to include a sentence that specifically addresses whether Alternative 2 will impact the toxicity and volume of COCs at the site.	This paragraph has been revised as follows: "The mobility of PCBs is controlled by the CM15 epoxy coating encapsulation and management. However, toxicity or volume would not be reduced because there are no active treatment processes associated with Alternative 2."
9	Specific	Evaluation of Alternatives, Cost, page 9: The second paragraph of this section states that there will be costs associated with monitoring of stormwater and sediment. Please revise this paragraph, as necessary, to make it consistent with earlier agency comments made on the Hangar 1 Long Term Management Plan recommending sampling of sediment (only) for PCBs and lead.	The paragraph was revised to make it consistent with agency comments made on the Hangar 1 Long Term Management Plan recommending sampling of sediment (only) for PCBs and lead.
10	Specific	Table 4, page 10: The assessment of "Technical and administrative feasibility" for Alternative 1 indicates that this alternative has "Low effectiveness." It is not clear based on the discussion why it would be any less feasible to implement No Action than to implement Alternative 2, Institutional Controls. Furthermore, although the cost evaluation is consistent with Table 1 of the Hangar 1 FFS, it seems to contradict the text in Section 6.6 of the FFS, which states that "Alternative 1 is rated high...and Alternatives [sic] 2 is rated medium in implementability." Please revise the PP and FFS for consistency and further explain why No Action would be considered to have "Low effectiveness" with regard to "Technical and administrative feasibility."	<p>Concur. The No Action Alternative is considered to be high in technical and administrative feasibility because it is easy to implement no action.</p> <p>The No Action was revised to be "High" with regard to "Technical and administrative feasibility." The Alternative 2 was revised to "Medium" with regard to "Technical and administrative feasibility". The word "effectiveness" was deleted from both alternatives.</p> <p>Also, additional text was added to section Evaluation of Alternatives under "Implementability" to further clarify technical and administrative feasibility selection.</p> <p>Section 6.6 of the Draft Final FFS was revised as follows: "Alternative 1 is rated high in implementability because it involves</p>

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#	Reference	EPA Comment	Response
			no action. Alternative 2 is rated medium in implementability because of the procedures required to implement ICs, maintenance and monitoring of the epoxy coating and sediment monitoring, which all require planning documents, field work, and annual reporting."
11	Specific	Community Participation, page 11: The first bullet on the page states that comments can be made using the comment form included in the PP. Please revise this bullet to allow the public to submit comments on any paper or stationery.	Deleted "use the comment form included with the Proposed Plan to" in order avoid the public thinking that comments could only be submitted using the comment form included with the Proposed Plan.
12	Specific	Community Participation, page 11: The last paragraph of the first column on the page states that, together with the Navy, NASA, EPA and the Water Board will review and consider comments before making the final decision. While the other agencies are involved in the process and EPA and the Water Board will concur on the remedy selected, the Navy is the lead agency and is the only entity that will review and consider comments on the PP. Please revise this sentence for accuracy.	Rewrote sentence to say "After the public comment period is over, the Navy will review and consider comments received before making a final decision on the remedial action alternative to be used at Hangar 1."
13	Specific	Information Repository box, page 11: The street address for the Mountain View Public Library is included for the reader. Please also include the hours and phone number for the Information Repository.	Mountain View Public Library phone number and working hours for the Information Repository are now included within the text box.
14	Minor	Previous Investigations and Decisions, page 4: There is a typographical error in the first sentence that begins with "The objective of the NTCRA..." The word "impact" should be replaced with "impacts."	Added "s" to "impacts" in first sentence of third paragraph.

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Comments Dated: May 6, 2013

The following are responses to comments provided by Donald M. Chuck, NASA Ames.

#	Reference	NASA Comment	Response
General Comments			
1	General	<p>The Navy recently completed the field work for their Non-Time-Critical Removal Action (NCTRA) for Hangar 1. The NCTRA comprised of removing the contaminated siding and coating of the frame with an epoxy coating. The coating is required to encapsulate contamination remaining in the paint on the frame. To complete the Comprehensive Environmental Response and Liability Act (CERCLA) process, the Navy has developed their Proposed Plan (PP). The Navy's Proposed Plan (PP) for the long-term maintenance NCTRA for Hangar 1 relies on the establishment of institutional controls (IC). The purpose of the ICs are to set up measures for protecting and monitoring the effectiveness of the removal action. Inherent in the Navy's primary IC for the proposed alternative (Alternative 2), is the proposal that the Property Owner and/or tenant will assume the responsibilities for the inspection, maintenance, and reporting on the effectiveness of the NCTRA. NASA agrees in part to this. Specifically, in previous discussions with the Navy, NASA had agreed to take over the maintenance of several aspects of the hangar. These items include the new galvanized walkway to the beacon and the star, the two clam shell door hinge pins, thirty-six trucks supporting the doors, the four door gear drive motors, to resume the Bird Airstrike Hazard (BASH)</p>	<p>The Navy is pleased that NASA agrees to take over the maintenance of several aspects of the hangar and implement ICs. Please note that implementation of ICs includes the Long-Term Management (LTMgmt) Plan for NTCRA PCB Contamination at IR Site 29.</p> <p>The Navy considered future reuse when selecting the removal action alternative. As previously detailed in Response to Comments (RTCs) to NASA on the Draft Focused Feasibility Study, the primary source of contamination at Hangar 1 was removed and properly disposed of, leaving only certain concrete structures and the hangar's structural steel, which was coated with a lead-based paint that contains PCBs. The industry standard for reusing a structure such as Hangar 1 that contains a lead-based paint is to overcoat and maintain these coated surfaces.</p> <p>As with all buildings at Moffett Field, the facility owner/operator is responsible for routine maintenance of buildings, which includes maintaining coated surfaces. NASA procedures for dealing with lead-based painted surfaces are described in the NASA Ames Health and Safety Manual, Chapter 35, Lead Management Plan.</p> <p>Furthermore, in a letter dated May 26, 2009 to the Navy, NASA stated that "To enable Navy's planning for ultimately ending direct involvement in environmental activities at Moffett Field, NASA will assume responsibility for the operations and maintenance of remaining Moffett Field remediation sites after remedial actions are</p>

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#	Reference	NASA Comment	Response
		<p>management in the vicinity of the hangar, and the maintenance of the hangar's electrical vaults with the exception of electrical vault five. As has been relayed on several occasions in the past, it is NASA's expectation that the Navy will retain the liability and responsibility associated with all other aspects of the Hangar 1 not listed above, to include the protection of the coating and preservation of the containment at their expense, pre- and post- residing. NASA is willing to work with the Navy in establishing the following ICs presented in the PP to support the Navy's removal action long-term management:</p> <ul style="list-style-type: none"> • Installation and maintenance of signs notifying of the potential exposure hazard, • Administrative arrangements for access, • Administrative commitment to incorporate appropriate notices and restrictions in any property transfer agreements. <p>The Navy is aware that NASA is currently engaged with the General Services Administration (GSA) to establish an out-lease arrangement of the East Side of Moffett Field, including Hangar 1. Regardless of the outcome of this activity, Hangar 1 will be re-used by some entity, an out-lessee or NASA. A pre-requisite to re-use however, is the residing of the Hangar. The Navy was aware that residing will be necessary for reuse of Hangar 1 during the evaluation of alternatives as part of the Engineering Evaluation and Cost Analysis (EE/CA) The Navy elected to implement the CM-15 epoxy</p>	<p>completed at each of those sites as determined by EPA Region 9." The Navy has been relying on NASA's commitment as stated in its May 26, 2009 letter in advancing the environmental cleanup program at former NAS Moffett Field toward the O&M stage.</p> <p>With the implementation of ICs as the final remedial action, the CM15 coating should provide long term protectiveness of human health and the environment. 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. The placement of the coating does not preclude NASA's residing and reuse undertaking. If the CM15 coating is penetrated (whether intentionally or inadvertently) during residing and/or reuse, the coating must be touched up in accordance with the LTMgmt Plan for NTCRA PCB Contamination at IR Site 29. The Navy does not assume any liability for touchups required due to activities of NASA or its tenants. Furthermore, the Navy has no obligation to maintain NASA's structures, including Hangar 1.</p>

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		coating approach to mitigate the hangar's environmental and health/safety issues. This also meant that the Navy was aware that when any residing occurs, that the coating would be disturbed and they would have to ensure, at their expense, that the coating remained a fully effective mitigation, before, during and after the completion of any re-siding effort. In sum, the Navy is responsible for demonstrating the NCTRA is effective at preventing exposure of the contamination to the environment and human health before and after residing.	
2	Specific	Facility History, Paragraph 5, Pg. 2 Please add text to the 2 nd sentence to indicate that NASA assumed control of the former NAS Moffett Field with the exception of the military housing. The military housing was transferred to the Department of Defense as part of the 1992 BRAC. In the following sentence, the US Army is not currently a resident agency at NASA Ames. In the final sentence, delete service station and golf course. The service station no longer exists and the golf course is operated by the NASA Ames Exchange.	The section will be updated by adding "with the exception of military housing" to the second sentence, deleting "U.S. Department of the Army" from the third sentence and deleting "a service station" and "and an 18-hole golf course."
3	Specific	Site Description, Previous Investigation and Decisions, 1st Sent., Pg. 3 Delete "... NASA's eastern diked marsh ..." and replace with "... the eastern diked marsh ..." The eastern diked marsh (EDM) received storm water from Navy and NASA. The EDM is also part of the Navy's Site 25.	The section will be updated as suggested.
4	Specific	1st Paragraph, pg. 4 NASA and the California State Historic Preservation	The Navy provided RTCs to NASA and SHPO on Alternative 10 of the EE/CA in 2008. In addition, as previously detailed in RTCs to

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#	Reference	NASA Comment	Response
		Officer (SHPO) commented on Alternative 10 of the EE/CA in 2008 and proposed that the Navy remove the greatest amount of the existing PCB and lead-based paint from the steel frame with an abrasive method in place of a high pressure power wash.	NASA on the Draft Focused Feasibility Study, the primary source of contamination at Hangar 1 was removed and properly disposed. The industry standard for reusing a structure that contains a lead-based paint is to overcoat and maintain these coated surfaces. High pressure power washing was completed to remove dust particles from the structural steel and ensure a positive bond between the existing painted surface and CM15 epoxy coating.
5	Specific	Risk Summary In the first paragraph under this heading, the goal of the risk assessment is to determine the appropriateness of a remedial alternative. Under the NCTRA, the contamination is still in place. Future use of the hangar will require residing and will again expose the contamination left on the frame thereby decreasing the protection of human health or the environment.	As previously detailed above and in RTCs to NASA on the Draft Focused Feasibility Study, the primary source of contamination at Hangar 1 was removed and properly disposed. The industry standard for reusing a structure that contains a lead-based paint is to overcoat and maintain these coated surfaces. With the implementation of ICs, which includes compliance with the LTMgmt Plan for NTCRA PCB Contamination at IR Site 29, the coating on the hangar's frame will continue to be protective of human health and the environment.
6	Specific	Risk Summary, 7th bullet, pg. 4 The bullet notes that the risk summary should include the evaluation of "other situations or factors that may pose threats to public health, welfare or the environment." In order for any future use of the hangar, the siding will have to be restored. During the residing process, works and the environment will be exposed to the PCBs and lead in the paint. The coating will no longer be effective at addressing the risks left by the NCTRA.	As with all buildings at Moffett Field, the facility owner/operator is responsible for routine maintenance of buildings, which includes maintaining coated surfaces. NASA procedures for dealing with lead-based painted surfaces are described in the NASA Ames Health and Safety Manual, Chapter 35, Lead Management Plan. If reuse of Hangar 1 is conducted in compliance with the LTMgmt Plan for NTCRA PCB Contamination at IR Site 29, the coating on the hangar's frame will continue to be protective of human health and the environment.
7	Specific	Risk Summary, Last Paragraph, Last Sentence, pg. 5 The sentence concludes that the CM15 epoxy coating	Please see RTC #6. In addition, the last sentence was modified as follows: "The nature of this risk indicates that removal of all interior

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#	Reference	NASA Comment	Response
		has mitigated the immediate threat. The epoxy coating does not mitigate the long-term threat.	structures and siding, and containment of the residual paint on structural steel with the CM15 epoxy coating has mitigated the immediate threat to public health. The long-term effectiveness of the coating will require routine maintenance of the coating and monitoring.”
8	Specific	1st Paragraph, pg. 5 What are the levels of PCBs and lead remaining on the frame? These values should be included in this discussion.	Interior paint sample results are summarized in Table 2-1 of the EE/CA. PCB levels will be included as suggested. Lead is not included as it is not a CERCLA COC. The following sentence has been added to the last paragraph under the Risk Summary section: “The total PCB levels remaining on interior structural steel paint range from 65 to 214 milligrams per kilogram.”
9	Specific	Remedial Action Objectives, 2nd Paragraph, pg. 5 PCBs are listed as the chemicals of concern for Hangar 1. What about lead? The frame is coated with lead-based paint. Lead has also been found in samples taken from the concrete deck.	PCBs were the regulatory driver for the NTCRA. However, asbestos and lead were also present in interior and exterior Hangar 1 building materials. Therefore, in the course of addressing the PCB contamination at Hangar 1, it was necessary to take into account health and safety issues associated with handling and working in the vicinity of materials containing asbestos and lead and to comply with requirements for proper management, abatement, or disposal of asbestos and lead as hazardous materials. Regarding the concrete deck, previous studies conducted by NASA in 2003 indicated that the concrete matrix contained 4.4 - 5 parts per million (ppm) of total lead, which indicates naturally occurring lead in the concrete. However, the concrete deck was cleaned as a requirement of the NTCRA and confirmation sampling has met site-specific cleanup criteria. As with all buildings at Moffett Field, the facility owner/operator is responsible for routine maintenance of buildings, which includes

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#	Reference	NASA Comment	Response
			maintaining coated surfaces. NASA procedures for dealing with lead-based painted surfaces are described in the NASA Ames Health and Safety Manual, Chapter 35, Lead Management Plan.
10	Specific	Remedial Action Objectives, 3rd Paragraph, 6th Sentence, pg. 5 See Comment 2 concerning the phrase "NASA's eastern diked marsh."	The reference to NASA's eastern diked marsh in the Remedial Action Objectives section is correct. This section discusses current and future human or ecological exposure to contaminated sediment and surface water runoff at the eastern diked marsh and storm water retention ponds, of which NASA is the property owner.
11	Specific	Remedial Action Objectives, 5th Paragraph, pg. 5 The second bullet states that the "remedy" must maintain protection over time. There is no indication that the CM15 epoxy will maintain protection over time. In order to demonstrate that the NCTRA is effective for the long term, regular inspection and maintenance will be required by the Navy.	In a letter dated May 26, 2009 to the Navy, NASA stated that "To enable Navy's planning for ultimately ending direct involvement in environmental activities at Moffett Field, NASA will assume responsibility for the operations and maintenance of remaining Moffett Field remediation sites after remedial actions are completed at each of those sites as determined by EPA Region 9." The Navy has been relying on NASA's commitment as stated in its May 26, 2009 letter in advancing the environmental cleanup program at former NAS Moffett Field toward the O&M stage. Furthermore, regular maintenance by the Hangar's owner/operator, through implementation of ICs which includes compliance with the LTMgmt Plan for NTCRA PCB Contamination at IR Site 29, will ensure the coating's effectiveness.
12	Specific	Remedial Action Alternatives, 5th Paragraph, 2nd Sentence, pg. 6 The sentence states that Alternative 2 is consistent with the planned future use of the property. Hangar 1 is planned for future use which will require the hangar to be resided. In the process of residing the hangar, the	Please see RTC #1.

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#	Reference	NASA Comment	Response
		CM15 epoxy coating is likely to be disturbed exposing the contamination that is encapsulated.	
13	Specific	List of potential institutional controls, pg. 7 The 3rd bullet states that one potential measure is property owner and tenant commitment to inspection and maintenance of the CM15 epoxy coating. It is NASA's position that the Navy is solely responsible for the inspection and maintenance of the coating.	Please see RTC #11.
14	Specific	2nd Paragraph, pg. 7 The production of the five-year reviews is the sole responsibility of the Navy. The Navy is the agency required to show through inspections, maintenance, and reporting that the CM15 coating is effective at preventing exposure of the contamination to the public health and environment.	Please see RTC #11.
15	Specific	Implementability, 2nd Paragraph, pg. 9 Alternative 2 is not easily implemented. The inspection and maintenance of the coating will require access to the upper portions of the hangar which will require lifting machinery capable of reaching the top or the installation of scaffolding. There are at least two square million feet of frame surface that will need to be inspected. Implementing an inspection and maintenance for an area of this size and dimension is not easily accomplished.	As stated in the 2nd paragraph of page 9, all the technologies required to implement the alternative are common, can be procured readily and should be compatible with the current and anticipated site use.
16	Specific	Cost, pg. 9 NASA believes that the cost estimate of \$4,937,000 for this alternative is low. Costs are likely to be higher due to the complexity of the frame and dimensions of the	As detailed in the Draft-Final Focused Feasibility Study for Hangar 1, the cost estimate for Alternative 2 has been revised upward to \$5,938,000 (present-value cost). As noted in the FFS, the cost estimates are conceptual and are presented solely for the purpose of

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#	Reference	NASA Comment	Response
		hangar. Costs would also increase if the CM15 epoxy coating degrades faster than expected.	comparing alternatives in the FFS report; they should not be used for budgetary or planning purposes because actual costs may change based on comments received during the Proposed Plan. The Proposed Plan text will be revised accordingly. The cost estimate assumes that the CM15 epoxy coating would degrade slower, and therefore cost less to maintain, if the hangar were to be resided.

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Comments Dated: April 9, 2013

Responses to comments provided by Elizabeth K. Wells, Water Board.

#	Reference	Water Board Comment	Response
General Comments			
1	General	Please modify the Draft PP in accordance with comments provided to the Navy on the Draft Final Long-Term Management Plan (April 8, 2013) and the Draft Focused Feasibility Study (April 9, 2013). Regional Water Board staff comments on those documents apply directly to the content of the Draft PP.	Concur. Responses to Water Board comments that were provided on the Draft Final Long-Term Management Plan and Draft Focused Feasibility Study were carried forward to the Draft Final Proposed Plan for consistency. The Proposed Plan was revised specifically to address agency comments made on the Hangar 1 Long-Term Management Plan recommending sampling of sediment (only) for PCBs and lead.