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Today's Topics:

1. VOCs, REGULATION: Moffett Field (CA) 5-Year Review debate
(Lenny Siegel)

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Forwarded Message: [CPEO-MEF] VOCs, REGULATION: Moffett Field (CA) 5-Year Review debate

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Wednesday, July 21, 2010 1:06 AM

From: "Lenny Siegel" <lsiegel@cpeo.org>

To:

"Military Environmental Forum" <military@lists.cpeo.org>

We've had a back and forth here at California's Moffett Field (former Moffett Naval Air Station) about the protectiveness of the remedy for Site 28, the Westside Aquifer, also known as the Regional Plume shared with other responsible parties. On February 12, 2010 the Navy concluded:

"This Five-Year Review found that the remedy for Site 28 is currently protective of human health and the environment because on-site contaminant plumes are stable or decreasing, contaminated groundwater is being treated by WATS [Westside Aquifer Treatment System], and potential exposure pathways that could result in unacceptable risks are being controlled."

In May, the Restoration Advisory Board voted to challenge that finding, and on July 7 U.S. EPA officially disagreed with the Navy, stating:

"The remedy at the Site 28, WATS Area; is not protective because it does not adequately address potential health risks from long-term exposure to trichloroethene (TCE) and tetrachloroethene (PCE) through the vapor intrusion pathway."

The Navy defended its position in a July 20 response to EPA, calling its finding "appropriate" and explaining:

"The Navy's protectiveness statement acknowledges EPA's concerns for long term exposure by concluding that to ensure long term protectiveness of the remedy, follow-up actions need to be taken."

More interestingly, the Navy complains, "No current EPA guidance exists on how to address [vapor intrusion] issues and protectiveness statements in Five Year reviews.... As such

the EPA's non-concurrence determination was issued in an area where no guidance exists on an appropriate manner in which to address it."

In this regard, the Navy is right. This is one more reason why EPA should act without delay to issue a complete vapor intrusion guidance.

Lenny

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