



## REGION 9

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### Sent via Electronic Mail Only

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Subject: EPA Concurrence with the *Final Five-Year Review Report for Installation Restoration (IR) Sites 1, 22, 26, NASA Regional Groundwater Remediation Program, NASA Vapor Intrusion Area of Responsibility and NASA Land Use Controls, NASA Ames Research Center, NAS Moffett Field Superfund Site, Moffett Field, California*

Dear Bridget Moody:

The U.S. Environmental Protection Agency (EPA) has reviewed the *Final Five-Year Review Report for IR Sites 1, 22, 26, NASA Regional Groundwater Remediation Program (RGRP), NASA Vapor Intrusion Area of Responsibility (VI AOR), and NASA Land Use Controls (LUCs), NASA Ames Research Center, Naval Air Station (NAS) Moffett Field Superfund Site, Moffett Field, California, dated September 18, 2025 (Five-Year Review Report)*. The Five-Year Review Report addresses completed remedial actions for the named sites. This is the fifth *Final Five-Year Review* for Sites 22, and 26, and the sixth *Final Five-Year Review* for Site 1 per the Memorandum of Understanding that conveyed responsibility of operations and maintenance (O&M) and long-term monitoring (LTM) from the Navy to NASA on October 1, 2016. As directed by EPA, the *Final Five-Year Review* covers the period from 2019 through 2023. It is noted that the fifth Five-Year Review report for the Navy's IRP Sites 26 and 28, NAS Moffett Field Superfund Site was conducted by the U.S. Navy and submitted to EPA under separate cover. EPA concurred with the Navy's *Final Five-Year Review* for IR Sites 26 and 28 on April 2, 2025.

EPA concurs with NASA's short-term protectiveness statements that the following reviewed remedies at NAS Moffett Field Superfund Site are currently protective of human health and the environment with respect to the remedial action objectives identified in their respective records of decisions (RODs) and ROD Amendments.

- **Site 1** – The remedy for Site 1 is currently protective of human health and the environment because potential exposure pathways are incomplete, groundwater contaminant concentrations are stable, pumping from Building 191 continues to maintain the preferred groundwater flow direction, landfill gas is not migrating from the landfill, and the landfill cap is functioning as intended.

To ensure long-term protectiveness, additional sampling for PFAS (per- and polyfluoroalkyl substances) should be performed to further assess potential risk is needed.

- **Site 22** – The remedy for Site 22 is currently protective of human health and the environment because potential exposure pathways are incomplete, groundwater contaminant concentrations do not indicate any leaching or releases from the landfill, pumping from Building 191 continues to maintain the preferred groundwater flow direction, landfill gas is not migrating from the landfill, and the biotic barrier is functioning as intended.

To ensure long-term protectiveness, additional sampling for PFAS should be performed to further assess potential risk is needed.

- **Site 26** – The remedy for Site 26 is currently protective of human health and the environment because groundwater contaminant plumes are stable or decreasing and land use controls are in place to prevent access to contaminated groundwater and minimize future potential vapor intrusion risk. Reductive dechlorination is still active and MNA is still viable.

To ensure long-term protectiveness, additional sampling for PFAS should be performed to further assess potential risk is needed. The remedy for Site 26 is currently protective of human health and the environment.

- **NASA RGRP and NASA VI AOR** – The groundwater remedy for the NASA RGRP and the vapor intrusion remedy for the NASA VI AOR are currently protective of human health and the environment because there is no direct exposure to contamination. Governmental controls are in place to prevent access to contaminated groundwater. The vapor intrusion control systems, monitoring program, and institutional controls are in place to minimize exposure risk from vapor intrusion.

To ensure long-term protectiveness, additional sampling for PFAS should be performed to further assess potential risk is needed. Additionally, for the remedy to be protective in the long-term, alternative groundwater cleanup technologies should be selected to accelerate the reduction of the source of vapor intrusion.

As NASA and EPA have agreed, the next Five-Year Review for these sites at NAS Moffett Field Superfund site is due on February 12, 2030. EPA appreciates the NASA Moffett team working closely with the EPA team to address EPA's comments and finalize this Five-Year Review Report. If you have any questions regarding this letter, please contact Yvonne Fong at [Fong.Yvonnew@epa.gov](mailto:Fong.Yvonnew@epa.gov) or Alana Lee at [Lee.Alana@epa.gov](mailto:Lee.Alana@epa.gov).

Sincerely,

Michael Montgomery, Director  
Superfund and Emergency Management Division

cc (via e-mail only):

Garrett Turner, NASA  
Mary Snow, Regional Water Quality Control Board  
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