

Phase I Environmental Site Assessment and Mitigation at Moffett Federal Airfield



EKI provides on-going environmental support to a client who has recently leased 1,000 acres of land, including the airfield and airport operations, at the former Moffett Naval Air Station (Moffett Field). When Moffett Field closed as a military base in 1994, the facility was transferred to National Aeronautics and Space Administration (NASA). EKI's client is leasing the former airfield as well as the associated hangars and support facilities from NASA. As part of due diligence, EKI prepared a Phase I ESA of the 1,000-acre leasehold in compliance with ASTM E1527 and the standards issued by the U.S. Environmental Protection Agency (U.S. EPA) in 40 CFR Part 312 (AAI Final Rule). The primary concerns at the facility include chlorinated solvents in groundwater, residual petroleum hydrocarbons from fueling operations, as well as polychlorinated biphenyls and lead that were originally used in paint and other materials coating a large, historic hangar.

With the background information provided in the Phase I ESA report and in documents from NASA, the U.S. EPA issued to EKI's client a Bona Fide Prospective Purchaser letter identifying the "reasonable steps" that the client, and new user, must take with respect to the existing environmental conditions at the property. One of those reasonable steps includes the preparation of and compliance with the Environmental Issues Management Plan (EIMP) prepared by EKI. EKI worked closely with our client, counsel, NASA, the U.S. EPA, and the California Water Board to develop the EIMP. The EIMP provides a framework for decision-making regarding residual contamination in soil, groundwater, and existing structures within the leasehold during both occupancy and redevelopment.

EKI continues to provide on-going technical support to the client and the re-use team to facilitate compliance with the EIMP and regulatory agency requirements. Such activities include assessment of vapor intrusion, development of plans and specifications to incorporate EIMP requirements into all relevant construction programs, and acting as the primary liaison with the client, contractor, regulatory agencies, and NASA with regard to environmental issues.