



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

8 July 1991

Mr. Stephen Chao
Naval Facilities Engineering Command
Western Division, Code 18
Office of Environmental Management
900 Commodore Drive, Bldg 101
P.O. Box 727
San Bruno, CA 94066-0720

Dear Mr Chao:

The Environmental Protection Agency (EPA) has received your letter dated 27 Jun 1991 (5090 Ser 1813SC/00740) requesting an extension for the submission of the Draft Remedial Investigation (RI) Report (Phase I & II). EPA has reviewed your request and pursuant to Section 27 Extensions, Naval Air Station Moffett Field (NASMF) Federal Facilities Agreement (FFA), concludes sufficient reason for good cause exists to warrant an extension.

EPA agrees with the Navy that operable units (OU) would facilitate the overall response program and lead to remediation activities at OU's at earlier dates than are currently embodied in the FFA and we agree with the proposed OU designations in your 27 June 1991 letter. The Navy should submit a draft schedule for all primary documents (RI/FS, Proposed Plan and Record of Decision (ROD)) for each OU proposed by the Navy within twenty-one (21) days from receipt of this letter for regulatory agency review and comment. The regulatory agencies will prepare written comments on the proposed schedule within 15 days of receipt of the proposed schedule. The Navy will then have 15 days to make revisions and reissue the proposal.

Although the OU approach requires separate submittals and schedules, it also allows for easier tasking of investigative work. To the extent practicable, OU schedules should be formulated to be concurrent. After the last OU ROD, a basewide FS and ROD will be necessary to incorporate a basewide risk assessment and tie together all OU RODs. Alternatively, the last OU could tie together all OU's and serve as a basewide ROD.

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EPA looks forward to working with the FFA parties to develop a new schedule that will begin remediation efforts at the earliest practicable date. If you have any questions please contact me at (415) 774-2412.

Sincerely,


Lewis Mitani
Remedial Project Manager

cc: distribution list

Distribution List

California Regional Water Quality
Control Board
San Francisco Bay Region
Attn: Mr. Wilfried K. Bruhns
1800 Harrison Street, Suite 700
Oakland, California 94612

Department of Health Services
Toxic Substances Control Program
Attn: Mr. Cyrus Shabahari
2151 Berkeley Way, Annex 9
Berkeley, CA 94704

CDM-Federal Programs
Attn: Ms. Cathy McDade
301 Howard, Suite 910
San Francisco, CA 94105