



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94105

16 August 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 reviewed the operable unit (OU) proposals for Naval Air Station Moffett Field (NASMF) and our comments are enclosed.

OU documents such as RI/FS, is an administrative culmination of field work and a number of OU options are possible, such as clustering of sites by media or geographic location, or investigative completeness. To streamline the administrative process, the EPA recommends OU-2 be combined with OU-4 and OU-3 be combined with OU-5. Only one primary document(s) are necessary for the aforementioned combined OU's. Each primary document should be structured to facilitate review for the multiple sites/media encompassed in the documents.

All draft primary documents should have an actual date of submittal, subsequent iteration of the documents (draft final, final) will be per consultation clause.

If you have any questions please contact me at (415) 744-2412.

Sincerely,

  
Lewis Mitani  
Remedial Project Manager

enclosure

cc: distribution list

*Admin Rec.*

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301 Howard Street, Suite 910  
San Francisco, CA 94105

8/16/91

EPA Comments to  
Naval Air Station Moffett Field  
Proposed Schedule

General Comments

1. For each proposed operable units (OU) a draft Remedial Investigation report (OU-RI) should be clearly stated; e.g. Draft OU-1 (or Name of OU) Remedial Investigation Report.
2. For each proposed OU, the deadline for draft primary documents should be an actual date not elapsed time. Draft primary documents are RI report, Feasibility Report (FS), Proposed Plan (PP), Record of Decision (ROD), and Remedial Design/Remedial Action (RD/RA) schedule. The subsequent deadline submittal date of the draft final and final of the primary documents are per consultation clause.
3. Each OU proposed plan should be submitted to the regulatory agencies with the FS. The proposed plan is essentially the recommendation or conclusion of the FS and should be reviewed as one package. Also, the FS and PP is a major milestone submittal and will be reviewed by the superfund, RCRA, water and air programs as well as the office of regional counsel.
4. The Initial Screening of Remedial Technologies document need not be finalized as a separate document. Regulatory agency comments should be incorporated into the subsequent draft primary FS document and finalized as part of the FS document.

Specific Comments

OU-2 and OU-4

Both OU-2 and OU-4 RI report have the same submittal date of April 1, 1992. For administrative purposes, each draft primary document(s) should be combined into one submittal. Since a number of sites are involved, each site or cluster of sites may be addressed as a chapter in the primary documents.

OU-3 and OU-5

Both OU-3 and OU-5 RI report have the same submittal date of April 1, 1993 and should be combined into one document. Same rationale as OU-2 and OU-4.