



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 27, 1993

Mr. Stephen Chao
Naval Facilities Engineering Command
Western Division
900 Commodore Way, Bldg. 101
San Bruno, CA. 94066

Re: Final Installation Restoration Program Petroleum Sites
(And Wastewater Tanks and Sumps) Characterization Report,
dated October 1, 1993

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document and its associated response to comments. While the document is an improvement over the draft version (Table 17 [Summary of Recommendations] is a very helpful addition), a few problems still remain.

Throughout Section 3.0 (Conclusions and Recommendations), it is mentioned that cleanup levels for soils are to be developed in the Corrective Action Plan. As EPA wrote in the comments on the West Side Aquifers RD/RA Workplan (letters dated September 15, 1993 and October 22, 1993) and as RWQCB has stated in the past, cleanup levels for petroleum in soils are already defined and are non-negotiable, unless the Navy can prove that the petroleum products won't impact groundwater. Is there disagreement or misunderstanding over this statement?

Also in this section, the Navy describes a field work plan that will be prepared to document additional investigation activities. Please provide an approximate date for this document's release.

Finally, in the last paragraph on page 73 of the final document, the Navy makes the statement "Consistent with state guidance, groundwater evaluations are not required unless evidence of soil contamination is identified". Hopefully, this a simplified statement referring to the *Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites* (August 10, 1990) and is not a misunderstood interpretation of this document. EPA agrees with the RWQCB that these guidelines for tank excavations and investigations are required for Moffett Field.

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According to the Federal Facilities Agreement (FFA) §9.9 (Finalization of Reports), the draft final primary document shall serve as the final document if no party invokes dispute resolution regarding the document. EPA realizes that this document went to final without a draft final, although it does appear in the FFA schedule (soon to be signed amendment). In order to make sure all state and federal regulations are being adhered to, EPA requests that these changes be made. Call me as soon as possible at 415-744-2383 to resolve these issues.

Sincerely,



Michael D. Gill
Remedial Project Manager
Federal and Technical Programs Branch

cc: Elizabeth Adams (RWQCB)
Ken Eichstaedt (URS)
Chip Gribble (DTSC)
Josh Marvil (PRC) (Fax)

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