



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

June 5, 1995

Mr. Stephen Chao
Naval Facilities Engineering Command
Engineering Field Activity, West
900 Commodore Way, Bldg. 101
San Bruno, CA. 94066-2402

Re: *Site 12 Completion Report*

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has reviewed responses to comments and change pages associated with the subject document that were provided by your consultant, PRC. The following changes are required. They have been discussed with and concurred on by the State of California. If you have any questions, please call me at 415-744-2385.

- 1) The area south of the already excavated area that exceeds the 400 mg/kg TPH-extractable cleanup level (indicated on your Figure 8) needs to be excavated until cleanup levels are achieved. At least one sidewall sample in this area shows a level of 1100 mg/kg TPH-extractable in soil. The arc in this figure showing the probable area of higher than 400 mg/kg concentrations in soil presents a good starting point for how far south the excavation should extend.
- 2) The soil boring at location SB12-21 needs to be converted to a monitoring well since the eastern border of contamination is unknown due to the fact that no sampling was performed under the taxiway apron. This monitoring well can provide a check of any lateral contaminant flow. This well should follow a sampling regime similar to MW12-20.
- 3) EPA agrees with the Navy that the combination of low levels of soil contamination between the eastern side of the previous excavation and the western side of the taxiway apron and the likelihood that excavation closer to the runway in this area would undermine the integrity of the apron are valid reasons to say no additional excavation is necessary in this area. However, the Navy needs to make NASA aware of this remaining contamination and get their concurrence prior to closing out this completion report.

Sincerely,

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

cc: C. Joseph Chou (DTSC), M. Bessette (RWQCB), K. Eichstaedt (URS),
S. Olliges (NASA), P. Strauss (MHB), M. Young (PRC) (Fax)