



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

March 20, 1996

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

Re: *Results of Surface Water and Sediment Sampling in Northern Channel at Fuel Pier Bridge,*  
dated February 16, 1996

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject letter report. While the sampling and analysis done at the site appeared to be complete, the conclusion reached regarding the source of the nonaqueous sheen on the surface of the Northern Channel does not appear substantiated.

No less than six times throughout the report, the authors describe that lab analysis could not conclusively pinpoint the source of the sheen as biogenic or anthropogenic in nature, due to chromatogram patterns not matching known TPH standards. Then, because of field observations of gaseous emissions in the site sediments (bubbles), the conclusion states that the source of the sheen must be biogenic in nature and that a recent fuel spill could not have occurred. If one is to believe the analytical portion of the report, the statements regarding source should remain inconclusive.

While maybe beyond the scope of work for this report, other questions need to be answered. Have the two JP-5 carrying pipes that run directly over the Northern Channel on Fuel Pier Road been pressure tested recently to determine their integrity? Do they show any signs of leaking? Is there any obvious impact to ecological receptors in the immediate area? Do the spill containment booms placed by NASA in December (still in place at late as March 14th) show any signs of staining? Until questions like these can be addressed, EPA does not believe the analysis on this site is complete. Future monitoring may be necessary to insure that no impacts have occurred and that no further action is necessary. If you have any questions, please call me at 415-744-2385.

Sincerely,

Michael D. Gill  
Remedial Project Manager  
Federal Facilities Cleanup Office

cc: Michael Bessette (RWQCB), C. Joseph Chou (DTSC), Ken Eichstaedt (URS),  
Sandy Olliges (NASA), Peter Strauss (MHB), Mike Young (PRC) (Fax)