



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

May 24, 1996

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

Re: *Revised Draft Active Petroleum Sites Investigation Technical Memorandum*,
dated March 29, 1996

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and provides the following comments. We understand that this document is the first submittal to the regulatory agencies, although it is called a "Revised Draft". Because petroleum has been excluded from CERCLA at Moffett Federal Field (see Federal Facility Agreement [FFA] amendment of December 17, 1993 and FFA Sections 2, 5 and 7), final approval of petroleum related documents must be performed by the State of California. However, if during additional investigations, any petroleum contamination is discovered to be commingled with any CERCLA substances at these or any other sites, remediation will need to be administratively handled through the CERCLA process with EPA involvement. If you have any questions, please call me at 415-744-2385.

1. Please **bold** the concentrations in Tables 7-16 that are above the cleanup standards.
2. Figures 5 and 6. Please add groundwater flow direction to these figures.
3. Section 6.1, page 56. Please indicate here that VOCs will be remediated through the West Side Aquifer and/or MEW treatment systems.
4. Section 6.2, page 57. Please provide an estimated schedule for the second round of groundwater sampling at Hydrants 1 and 2 and the Corrective Action Plan.
5. Section 6.3, page 57. Continued monitoring should occur in this area for an agreed upon amount of time to ensure that natural degradation is, in fact, occurring.

Sincerely,

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Office

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