



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

October 17, 1996

Mr. Stephen Chao  
Naval Facilities Engineering Command  
Engineering Field Activity, West  
900 Commodore Way, Bldg. 210  
San Bruno, CA. 94066-2402

Re: *Draft Site 5 Phase I Corrective Actions Technical Memorandum*, dated August 15, 1996

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and provides the following comments. Because petroleum has been excluded from CERCLA at Moffett 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. 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. The report provides a good overview of the testing and field activities that occurred during the Site 5 bioventing and biosparging study.
2. EPA will always encourage the Navy to investigate the use of innovative technologies, as was done in this Site 5 bioventing and biosparging study. Because the Navy does not believe that these technologies prove to be cost effective remedial alternatives for Site 5 soil and groundwater does not mean that all remedial alternatives except intrinsic remediation should be eliminated from consideration. Although it is possible that the State may determine that Site 5 is a "low risk" fuel site, and intrinsic remediation may be an acceptable alternative, this has yet to happen. Other "active" remedial alternatives still should be considered. This is not evident from the report.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Gill".

Michael D. Gill  
Remedial Project Manager  
Federal Facilities Cleanup Office

cc: J. Chou (DTSC)  
K. Eichstaedt (URS)  
S. Olliges (NASA) (email)  
M. Rochette (RWQCB)  
P. Strauss (MHB)  
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