



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

February 7, 1997

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

Re: *Draft Basewide Petroleum Site Evaluation Methodology Technical Memorandum,*
dated January 24, 1997

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and provides the following comment. Section 4.0 says that, with the exception of Sites 9 and 14-South, no petroleum-related contaminants above MCLs have been detected at any of the IRP petroleum sites. In the Draft August 96 Quarterly Report (dated December 31, 1996), well W17-1 in the Site 5 area showed notable increases in TPH-gasoline and TPH-deisel concentrations, both well above the site specific petroleum cleanup levels. This site should be included in any future evaluations.

Because petroleum has been excluded from CERCLA at Moffett Federal Airfield (see Federal Facility Agreement 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. Due to commingling of petroleum products and CERCLA substances at some of these sites, consideration of handling these sites administratively through the CERCLA process with EPA involvement should be made. If you have any questions, please call me at 415-744-2385.

Sincerely,

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

Michael D. Gill
Remedial Project Manager
Federal Facilities Cleanup Branch

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