



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

December 16, 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 Groundwater Treatability Study Technical Memorandum*,  
dated November 18, 1996

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and provides the following comments. If you have any questions, please call me at 415-744-2385.

1. The evidence for past and on-going intrinsic biological biodegradation is poor. The only direct evidence for biodegradation appears in the shift in chromatograms shown in Figure 13. It is the case that a proportional shift to higher molecular weights would be expected as a result of biodegradation. However, the tanks in question have also contained AVGAS and JP-4 for significant periods of time and JP-8 most recently. Standard chromatograms of these fuels should also be compared to the site sample. Furthermore, no evidence is presented to indicate the past or current rate of biodegradation, or if such activity is still occurring at all. While it is likely that microbial activity is happening, the Navy should at least determine the rate before accepting intrinsic remediation as the corrective action. If the Navy is going to pursue the proposal of intrinsic biodegradation for this site in future reports, these problems will need to be addressed.
2. Inconsistencies exist in the concentration units listed in at least the following areas: Figures 4, 5, 9, 10, Sections 1.6.2, 3.2.1, 6.3.3, and Tables B2, B3. It seems that all units should be in ppb versus ppm.

Sincerely,

Michael D. Gill  
Remedial Project Manager  
Federal Facilities Cleanup Office

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