



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

February 18, 1997

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

Re: *Draft Operable Unit 1 Alternatives Analysis Technical Memorandum,*  
dated February 3, 1997

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.

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)  
T. Mower (PRC) (email)  
S. Olliges (NASA)  
M. Rochette (RWQCB)  
P. Strauss (MHB)

## COMMENTS

*Draft Operable Unit 1 Alternatives Analysis Technical Memorandum*, dated February 3, 1997

1. We appreciate that the Navy has included a thorough summary of Operable Unit 1's regulatory history in this document. This is important due to the unusual sequence of events surrounding these sites. Please include a similar description in the ROD for clarification.
2. Table 1. The ARARs listed here may not represent the final result of the stringency comparison analysis between federal and state ARARs that are still being discussed. All ARARs issues obviously need to be resolved for the ROD to be finalized.
3. Section 1.2.2, page 7, last sentence. "Municipal-type wastes were found to be isolated in a trench..." Please clarify if this is the "bathtub" originally describing the waste area or one of the numerous trenches dug out in the pipeline investigation. The wording here seems to indicate that this trench is larger than one of the investigation trenches.
4. Section 3.5, page 19, para 2. Please elaborate on what steps will be "taken to allow animals to migrate off site during construction and return after completion".
5. Section 4.0, page 20, last sentence. Groundwater monitoring should be performed in accordance with 23 CCR, Chapter 15 requirements (see letter from DTSC dated November 20, 1996, page 2).
6. Section 5.1, 5.2. These sections appear to provide an adequate description of the seven criteria necessary for evaluating the appropriateness of a CAMU. However, because this portion of RCRA has been delegated to the State of California, they (Department of Toxic Substances Control) have the final authority to grant the CAMU designation, with concurrence from EPA.
7. Section 5.3.1, page 27. "Minor modifications to the area may be necessary during remedial design...". Any impacts to the wetlands surrounding Site 1 need to be agreed to by the natural resource trustees, as it provides useful habitat to various ecological receptors.