



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

AR\_N00296\_003045  
MOFFETT FIELD  
SSIC NO. 5090.3.A

October 11, 1996

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

Re: *Draft Petroleum Tank Sites Investigation Technical Memorandum,*  
dated August 23, 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 Federal Airfield (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. 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,

Michael D. Gill  
Remedial Project Manager  
Federal Facilities Cleanup Office

cc: C. Joseph Chou (DTSC)  
Ken Eichstaedt (URS)  
Sandy Olliges (NASA) (email)  
Michael Rochette (RWQCB)  
Peter Strauss (MHB)  
Mike Young (PRC) (email)

## COMMENTS

*Draft Petroleum Tank Sites Investigation Technical Memorandum,*  
dated August 23, 1996

### GENERAL COMMENTS

1. Appendix A appears out of place. It should be made clear that the Tables and Figures referenced are from the Petroleum Tank Sites Closure Report from April 7, 1995.
2. We suggest that the State and the Navy determine cleanup levels for motor oil for both groundwater and soil. Table 18 uses the extractable TPH value for diesel and JP-5. This may or may not be applicable.
3. Select tank site areas had CERCLA substance contamination as well as petroleum contamination. These may need to be included in the CERCLA process.

### SPECIFIC COMMENTS

4. Page 36. Investigation at UST 41A (at the NEX gasoline station) exhibited detections of VOCs in soil and groundwater above MCLs (see Table 8). Explain why this area is not included under CERCLA investigations when it contains CERCLA substances. An alternative may be to administratively handle the site under an RWQCB Order. In any case, the agencies should be assured that the contamination will be remediated by either the regional pump and treat system or by some other means.
5. Page 48. Investigation at UST 57 (at the Auto Hobby Shop) exhibited detections of VOCs in groundwater above MCLs (see Table 11). Explain why this area is not included under CERCLA investigations when it contains CERCLA substances. An alternative may be to administratively handle the site under an RWQCB Order. In any case, the agencies should be assured that the contamination will be remediated by either the regional pump and treat system or by some other means.
6. Page 61. Investigation at UST 86B (at the Building 107 South Lawn) exhibited detections of benzene in groundwater above MCLs (see Table 15). Explain why this area is not included under CERCLA investigations when it contains a CERCLA substance. An alternative may be to administratively handle the site under an RWQCB Order. In any case, the agencies should be assured that the contamination will be remediated by either the regional pump and treat system or by some other means.
7. Page 69. Investigation at UST 87 (at the Building 15 alcove) exhibited detections of VOCs in groundwater above MCLs (see Table 17). Explain why this area is not included under CERCLA investigations when it contains CERCLA substances. An alternative may be to administratively handle the site under an RWQCB Order. In any case, the agencies should be assured that the contamination will be remediated by either the regional pump and treat system or by some other means.
8. Section 8.7, page 86. What happens if the groundwater analytical data does not pass the listed criteria; that is, the plume is not stable? Please provide a contingency plan (brief addition to the text) for the case where the groundwater plume is not stable at the UST 86A and 86B site.