



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

20 MAY 1988

Commanding Officer
Moffett Field ANG
129 ARRG/CC
Sunnyvale, CA 94031

Dear Commanding Officer:

As of April 17, 1988, Federal facilities were to have submitted a preliminary assessment (PA) of the extent of hazardous waste contamination at their facility to the U.S. Environmental Protection Agency (EPA). The Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by Section 120 of the Superfund Amendments and Reauthorization Act of 1986 (SARA), outlines the requirements for pre-remedial activities at Federal facilities. Section 120 (c) of SARA requires the EPA to establish a Federal Agency Hazardous Waste Compliance Docket. Section 120 (d) of SARA also requires us to take steps to ensure that all facilities on the docket submit a PA of the facility to EPA. A Site Inspection (SI) is also required if the PA indicates such an investigation is warranted.

A list of the facilities that are required to submit such information was published in the Federal Register (Volume 53, Number 29) on February 12, 1988. Your facility is included on this list. The April 17 deadline has passed and the Agency has yet to receive the required PA, and SI if warranted, for your facility. EPA must evaluate the PAs of all facilities, and as appropriate, include facilities on the National Priorities List (NPL).

EPA Region 9 soon plans to publish a notice listing all Federal facilities in this region which have not submitted PA information. To avoid being included on this list, please submit this information within fifteen days of receipt of this letter (or an explanation of the circumstances affecting the delay of your PA/SI submission and a projected date for its delivery). Please forward your response to Julie Anderson, Chief of the Federal Enforcement Section:

U.S. Environmental Protection Agency
Toxics and Waste Management Division (T-4-6)
215 Fremont Street
San Francisco, CA 94105

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EPA/NAVY 10

To assist in the preparation of your PA, enclosed you will find EPA Form 2070-12, "Potential Hazardous Waste Site: Preliminary Assessment," and the recently revised O.S.W.E.R. Directive #9345.0-01, "Preliminary Assessment Guidance for FY88." While you may use EPA Form 2070-12, we prefer you use the Region's narrative format, a copy of which is also provided. In either case, it is necessary to provide all information specified within the PA Guidance.

Please note, as this guidance was developed for use by EPA personnel, certain portions of the discussion do not apply to Federal facilities. Specifically, the determination of no further action and development of a final HRS score are solely EPA responsibilities. Federal facilities, however, are encouraged to make recommendations concerning further action at a site as well as to develop draft HRS scores. Your efforts in this regard will help to ensure all necessary data have been collected and documented.

Site Inspections should also have been submitted by April 17 where the PA for the facility indicated that a potential threat to human health or the environment exists. SI data should be collected in accordance with, "Attachment D: Documentation Requirements in Support of the HRS." This attachment was included in the EPA memorandum dated September 8, 1987, concerning pre-remedial activities at Federal facilities.

If you have any questions regarding submittal of the PA or SI information, please call Mike Flaherty of the Superfund Federal Enforcement Section at (415) 974-7952. Thank you for your prompt attention to this matter.

Sincerely,



Julie Anderson
Chief
Federal Enforcement Section

Enclosures

ENCLOSURE 1

**EPA FORM 2070-12
POTENTIAL HAZARDOUS WASTE SITE:
PRELIMINARY ASSESSMENT**

**THE ABOVE IDENTIFIED ENCLOSURE IS NOT
AVAILABLE.**

**EXTENSIVE RESEARCH WAS PERFORMED BY
NAVFAC SOUTHWEST TO LOCATE THIS
ENCLOSURE. THIS PAGE HAS BEEN INSERTED
AS A PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.**

QUESTIONS MAY BE DIRECTED TO:

**DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132**

TELEPHONE: (619) 532-3676

ENCLOSURE 2

REVISED
O.S.W.E.R. DIRECTIVE #9345.0-01
PRELIMINARY ASSESSMENT GUIDANCE FOR FY 88

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