



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

February 3, 1995

Mr. Stephen Chao  
Naval Facilities Engineering Command  
Engineering Field Activity, West  
900 Commodore Way, Bldg. 101  
San Bruno, CA. 94066-2402

Re: *Draft Final Operable Unit 1 Proposed Plan*, dated December 20, 1994

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and provides the following comments. As specified in the Federal Facility Agreement (FFA) §9.9, the period between the draft final and the final submittal of a primary document normally is considered an informal dispute period. That is, if the regulatory agencies have any issues that must be addressed, the document should not be finalized. Some small problems do exist in this proposed plan. These problems should not prevent quick finalization of the document. Call me at 415-744-2383 if you have any questions.

Sincerely,

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

Michael D. Gill  
Remedial Project Manager  
Federal Facilities Cleanup Office

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

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*Draft Final Operable Unit 1 Proposed Plan*, dated December 20, 1994

1. Page 1, Introduction, para 2. Please mention the contingency plan (subsurface collection trench) in this description of the remedy.
2. Page 2, Description of the Problem, para 2. Please be consistent with the Feasibility Study and use cubic yards as the units to describe the size of the landfill contents, as opposed to tons.
3. Page 4, Description of the Problem, para 9. Exposure pathways associated with groundwater did not include ingestion, as stated here. Please correct this.
4. Page 4, Description of the Problem, para 10. "This remedy strategy does not require thorough sampling of landfill content or an assessment of associated risks." This may be true, but since risks were calculated based on what sampling was performed, these risks should be presented (as shown in the FS, Section 1.4.1.3).
5. Page 5, Summary of Alternatives, para 1. Alternative 2 should include the contingency plan (groundwater collection trench).
6. Page 5, Summary of Alternatives, para 3. In describing when corrective actions will occur, exceeding groundwater protection standards should be supplemented with an explanation of increased head pressure and how it is an indication of future accelerated movement of contamination and leachate migration.