



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

November 16, 1995

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

Re: *Final Site 12 Source Control Measure Completion Report*, dated October 26, 1995

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document. Comments from our letter of June 5, 1995 and the proposed change pages from your contractor, PRC (fax dated April 26, 1995 from Steve Annecone), were satisfactorily incorporated. However, because of the additional actions required, as outlined in Section 7.0 of the document, the Navy needs to provide status report(s) in a format of your choice (quarterly report, tech memo, letter report) to keep the agencies and NASA apprised of the status of these actions. Actions include:

- The excavation in the area south of the already excavated area that exceeds the 400 mg/kg TPH-extractable cleanup level (indicated on your Figure 8) until cleanup levels are achieved. On-site treatment of the excavated soils is acceptable.
- Installation of a groundwater monitoring well near soil boring SB12-21 and monitoring for potential lateral migration of petroleum contaminants under this western border of the taxiway apron for at least four sampling events.

If detections of TPH or any other constituents (e.g. VOCs) in groundwater are found, then further corrective actions will be evaluated. Due to these additional requirements, we presently cannot concur on the document as final.

Because petroleum has been excluded from CERCLA at Moffett Field (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. However, if during additional investigations (e.g. Sites 9, 15) any petroleum contamination is discovered to be commingled with any CERCLA substances at these or any other sites, remediation will need to be administratively handled through the CERCLA process with EPA involvement. If you have any questions, please call me at 415-744-2385.

Sincerely,

Michael D. Gill

Remedial Project Manager
Federal Facilities Cleanup Office

cc: M. Bessette (RWQCB), C. Joseph Chou (DTSC), K. Eichstaedt (URS),
S. Olliges (NASA), P. Strauss (MHB), M. Young (PRC) (Fax)