



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

October 30, 1995

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

Re: *Recommendations for Corrective Actions at the IRP Petroleum Sites, Moffett Federal Airfield,*
dated September 1, 1995

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 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. Except for those comments below, the corrective actions proposed in this document are presently acceptable to EPA. Call me at 415-744-2385 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: Michael Bessette (RWQCB)
C. Joseph Chou (DTSC)
Ken Eichstaedt (URS)
V. Tom Jones (Schlumberger)
A. Eric Madera (Raytheon)
Sandy Olliges (NASA)
Peter Strauss (MHB)
Mike Young (PRC) (Fax)

COMMENTS

Recommendations for Corrective Actions at the IRP Petroleum Sites, Moffett Federal Airfield,
dated September 1, 1995

1. Site 9, page 2. When performing additional field work in this area to determine locations of sand channels and the extent of groundwater contamination in the downgradient areas of the Building 29 and 31 plumes, VOCs should be included in the analytical suite. If any VOCs are detected, determination of the source will be necessary (Navy source or the MEW regional plume?). If any commingling of petroleum has occurred with any CERCLA substances (e.g. VOCs), then remediation will need to be handled administratively under the CERLCA program.
2. Site 12, page 2. Please explain in more detail the Site 12-specific cleanup goal of 100 ppm of extractable TPH and its importance at this site. It is obviously different from the negotiated cleanup level of 400 ppm.
3. Site 12, page 3. In the EPA, 1995 reference, the regulatory agencies did require the Navy to excavate enough soil to achieve cleanup levels on the south end of the original excavation. The letter also stated that the soil boring SB12-21 should be converted to a monitoring well to check for any lateral flow of contamination under the eastern side of the taxiway apron. Is this what is referred to in this document as the additional downgradient well? What is the status of this well?
4. Site 19, page 5, para 3. Were any other contaminants besides TPHg detected in groundwater at downgradient wells from Tank 53 (e.g. TPHd, VOCs)?
5. Figure 1. The dates presented in this schedule typically show delivery of one document per site for the months of September and October, but none have been received by EPA. Are the dates intended to apply to regulatory agency deliveries? If not, what are these dates?