



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

March 11, 1997

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

Re: *Draft Basewide Petroleum Site Evaluation Methodology Technical Memorandum*,
dated January 24, 1997

Dear Mr. Chao,

The U.S. Environmental Protection Agency (EPA) has received the subject document and provides only one comment. On page 12, the text states: "However, with the exception of Sites 9 and 14-South, no petroleum-related contaminants above MCLs have been detected at any of the IRP petroleum sites." Does this refer to MCLs for CERCLA (non-petroleum) substances? If not, what MCLs is the Navy referring to? Levels reported in the August 96 Quarterly Report for the Site 5 Area show "a notable increase in concentrations of TPH-gasoline and TPH-diesel in well W17-1" (page 30). These levels (1,900 ug/L and 18,000 ug/L, respectively) are greater than the TPH cleanup levels noted in the IRP Petroleum Sites Corrective Action Plan (1994), and point out the necessity of not losing sight of Site 5's importance.

Because petroleum has been excluded from CERCLA at Moffett Federal Airfield (see Federal Facility Agreement 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. If commingling of petroleum products and CERCLA substances occurs at any of these sites, these sites may need to be handled administratively 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 Branch

cc: J. Chou (DTSC), K. Eichstaedt (URS), T. Mower (PRC) (email),
S. Olliges (NASA), M. Rochette (RWQCB), P. Strauss (MHB)