

5090
Ser T4E2CG/L3444
August 26, 1993

Mr. Michael Gill
U.S. Environmental Protection Agency
Region IX, Mail Stop H-9-2
75 Hawthorne Street
San Francisco, California 94105

**Subj: Elimination of Sites Requiring No Further Action From Operable Unit 2 -
West, Naval Air Station Moffett Field**

Dear Mr. Gill:

Pursuant to our previous conversations, the Navy is requesting elimination of sites requiring no further action from operable unit (OU) 2 - west at Naval Air Station (NAS) Moffett Field. OU2-west includes the unsaturated soils at Sites 8, 14, 16, 17, 18 and the western portion of Site 10. A process for eliminating sites requiring no further action has not been established and is the focus of this letter.

A summary of the OU2-west sites recommended for elimination with supporting rationale is provided below. Results of environmental investigations at these sites are documented in the Tank and Sump Removal Report (PRC 1991), Additional Tank and Sump Field Investigation Technical Memorandum (PRC 1993a), and the OU2 Remedial Investigation Report (IT 1993).

- **Site 10:** The western portion of Site 10 includes the Chase Park area of NAS Moffett Field. No unsaturated soil contamination has been identified in this area and no further action is necessary (IT 1993). Therefore, the western portion of Site 10 (Chase Park) is recommended for elimination from OU2-west.
- **Site 14:** Site 14 includes Tanks 19, 20, 67, and 68. Tanks 19, 20, and 67 were removed (along with the contaminated soils) and Tank 68 was closed in place (PRC 1991). No unsaturated soil contamination remains at these tank locations. However, minor petroleum-related groundwater contamination was identified near Tanks 19 and 20, and a limited groundwater pump and treat system has been implemented. Additionally, Tank 68, located near Building 88, will be removed during the demolition of Building 88 (see Site 18 below). Since no unsaturated soil contamination remains at these tank locations, Site 14 is recommended for elimination from OU2-west.
- **Site 16:** Site 16 includes Sump 60. Sump 60 and the surrounding contaminated soils were removed (PRC 1991). No unsaturated soil contamination remains at this site and no further action is required. Therefore, Site 16 is recommended for elimination from OU2-west.
- **Site 17:** Site 17 includes Sump 61. Sump 61 and the surrounding contaminated soils were removed (PRC 1991). No unsaturated soil contamination remains at this site and no further action is required. Therefore, Site 17 is recommended for elimination from OU2-west.

1919

5090
Ser T4E2CG/L3444
August 26, 1993

Provided below are descriptions of those sites which require additional investigation or remediation. OU2-west sites requiring remediation will follow guidance in the Middlefield-Ellis-Whisman Record Of Decision and procedures outlined in the OU2-west Remedial Design/Remedial Action (RD/RA) Work Plan (PRC 1993b).

- **Site 8:** Site 8 includes the waste oil transfer area in the northwestern portion of NAS Moffett Field. Volatile organic compounds were identified in soils in the vicinity of Site 8 during the OU2 remedial investigation (IT 1993). However, the nature and extent of the contamination is not completely defined and additional investigation is required. Additional investigation at Site 8 will be conducted during the additional investigation of inferred sources (PRC 1993c). Results of the additional investigations will be evaluated to determine whether remediation is necessary. In addition, the expanded Site 8 area is also being considered for a removal action by the National Aeronautics and Space Administration. If remediation is required, Site 8 will be included in the OU2-west remedial action. If no remediation is required, recommendations for no further action and elimination from OU2-west will be made.
- **Site 18:** Site 18 includes Sump 66, near Building 88. Sump 66 and some of the surrounding contaminated soils were removed (PRC 1991). Analytical data from soil samples near Sump 66 indicate that some tetrachloroethene (PCE) contamination may remain in place. Building 88 is also a source of PCE contamination in soils. Therefore, Site 18 is not recommended for elimination from OU2-west. Remediation of the remaining Site 18 soils is addressed in the OU2-west RD/RA Work Plan (PRC 1993b).

In summary, Sites 14, 16, 17, and the Chase Park portion of Site 10 pose no risk to human health or the environment, require no further action, and are recommended for elimination from OU2-west. Site 8 is not recommended for elimination because additional investigation is required, and Site 18 is not recommended for elimination because remediation of PCE contamination from Sump 66 and Building 88 is required.

As you are aware, the Navy did not have a previous opportunity to negotiate and document no further action decisions for these sites. To document the elimination of these sites from the Comprehensive Environmental Response, Compensation, and Liability Act process and expedite the overall remedial process, the Navy would appreciate written agency concurrence with the above recommendations.

If you have any questions or comments regarding this matter, please contact Ms. Camille Garibaldi at (415) 244-2516.

Sincerely,

original signed by:

MARCELO PASCUA, JR
Environmental Group 2 Supervisor

Copy to:
Regional Water Quality Control Board (Attn: Elizabeth Adams)
Department of Toxic Substances Control (Attn: Chip Gribble)

5090
Ser T4E2CG/L3444
August 26, 1993

Blind copy to:
NAS Moffett Field (Code 189, LT Openshaw and Code C2, Don Chuck)
PRC Environmental Management (Attn: Josh Marvil)
18, 09CMN, T4A, T4E2, T4E2SC, T4E2CG, Admin Record

REFERENCES

IT 1993. Remedial Investigation Report Operable Unit 2. Volumes 1 - 4. NAS Moffett Field, California. International Technology Corporation. May 1993.

PRC 1991. Tank and Sump Removal Summary Report. NAS Moffett Field, California. PRC Environmental Management, Inc. July 1991.

PRC 1993a. Additional Tank and Sump Field Investigation Technical Memorandum. NAS Moffett Field, California. PRC Environmental Management, Inc. March 1993.

PRC 1993b. Draft Final Operable Unit 2 - West Remedial Design and Remedial Action Work Plan. NAS Moffett Field, California. PRC Environmental Management, Inc. July 1993.

PRC 1993c. Draft Final Additional Investigation of Inferred Sources Field Work Plan, NAS Moffett Field, California. PRC Environmental Management, Inc. August 1993.