



DEPARTMENT OF THE NAVY

WESTERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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5090 IN REPLY REFER TO
Ser T4A1HC/L4170
23 Mar 1994

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

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

Dear Mr. Gill:

This letter responds to the U.S. Environmental Protection Agency's (EPA) letter dated December 17, 1993, regarding the elimination of sites requiring no further action from operable unit 2 - West (OU2-West) at Naval Air Station (NAS) Moffett Field.

On August 26, 1993, the Navy requested EPA eliminate Sites 14, 16, 17, and the Chase Park portion of Site 10 from OU2-west since they pose no threat to human health and the environment and require no further action. The request was made to formally document elimination of these sites from the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process at NAS Moffett Field. On December 17, 1993, EPA provided a written response approving the elimination of only Sites 16 and 17. EPA did not approve elimination of Sites 10 and 14; EPA stated that the Chase Park portion of Site 10 cannot be eliminated since the OU2 remedial investigation (RI) report (IT 1993) indicated high volatile organic compound (VOC) concentrations in the soils, and Site 14 cannot be eliminated until Tank 68 is removed and sampling confirms no contamination.

The Navy appreciates EPA's concurrence on eliminating Sites 16 and 17 and is preparing an information sheet for the public explaining the no action decision for these sites. Furthermore, the Navy agrees with the EPA's decision not to eliminate Site 14 until Tank 68 is removed and sampling confirms no contamination (this activity will occur during the Building 88 remedial action in spring 1994). The Navy, however, disagrees with the EPA's decision regarding Site 10.

PRC Environmental Management, Inc. (PRC) discussed the Site 10 data with EPA after the December 7, 1993 remedial project managers (RPM) meeting. During this discussion, Site 10 data and conclusions in the OU2 RI report were reviewed. The following statements were noted in the OU2 RI report (IT 1993):

Section 11.2.1, page 11-2. "A total of six VOCs with concentrations ranging from 6 to 800 ppb [parts per billion] were detected in four of the borings. The 7- to 11-foot-bls [below land surface] sample from EB-37 accounts for all of the concentrations above 150 ppb. Methylene chloride, 1,1-TCA [trichloroethane], 1,2-DCA [dichloroethane], trichlorofluoromethane, and TCE [trichloroethane] were detected in this sample at concentrations ranging from 60 to 800 ppb. Because the higher concentrations were detected at depths (7 to 11 feet bls) presumably below the water table, contributions from groundwater contamination are possible. Three VOCs (PCE [tetrachloroethene], TCE, and trichlorofluoromethane) were found at the 3- to 6.5-foot-bls depths in the borings (EB-60, EB-62, and EB-64) north of the runway at concentrations ranging from 6 to 150 ppb."

Section 11.2, page 11-1. "Because no sources exist in Chase Park, no samples were collected there."

Section 21.8.2, page 21-9. "ILCRs [incremental lifetime cancer risks] for chemicals of concern at the Site 10 runway area fall within the range deemed acceptable based on scientific and regulatory precedent. Higher ILCRs are associated with potential dermal exposures to beryllium; however, similarly high risks are associated with background levels of this metal. Based on the analysis of the available data, these chemicals of concern are not likely to have a systemic (noncarcinogenic) health effect upon occupational receptors. Future exposure scenarios also had ILCRs within the acceptable range. Potential systemic toxicity to humans resulting from intake of site-related chemicals is unlikely."

Additionally, three soil borings (SBU4-1, SBU4-2, and SBU4-5) were drilled in the vicinity of Chase Park during the spring 1992 west site aquifers additional field investigation and analyzed for VOCs (PRC 1993). Analytical results from samples collected in the unsaturated intervals of these borings (the upper 10 feet of soil) indicated no VOC detections in sample SBU4-5; detections of only 1,2-dichloroethene (1,2-DCE) (6 micrograms per kilogram [μ g/kg]) and TCE (120 μ g/kg) in sample SBU4-1; and no VOC detections in sample SBU4-5.

Furthermore, the Chase Park area of NAS Moffett Field lies above the regional VOC contaminant plume. Acceptable soil levels in this area are specified in the Middlefield-Ellis-Whisman (MEW) record of decision (ROD). The MEW ROD specifies soil cleanup standards as 100 times the maximum contaminant level (MCL) for a particular VOC. All VOC detections at Chase Park are below these standards.

These statements and observations can be summarized into the following:

- No potential sources of contamination were identified in the Chase Park portion of Site 10 during the RI. Therefore, no RI samples were collected in this area.

•RI Sample EB-37, which contained the highest VOC detections, was collected from the runway portion of Site 10, not from the Chase Park portion. Lower concentrations of VOCs were also detected in the runway portion of Site 10, not in the Chase Park portion.

•Human health risks associated with chemical concentrations in the runway portion of Site 10 are within EPA target levels (less than 1×10^{-6}).

Additional sampling in the Chase Park area indicated only minor detections of VOCs, which are below the MEW ROD soil cleanup levels.

In conclusion, Chase Park is an athletic track and baseball field. The OU2 RI did not identify any potential contaminant sources and, therefore, no samples were collected. The elevated concentrations of VOCs detected at Site 10 were from the runway portion and there are no health risks associated with these concentrations. EPA approved the OU2 RI report (and the data and conclusions contained therein) on April 23, 1993. Therefore, the Chase Park portion of Site 10 should be eliminated from OU2-west along with Sites 16 and 17, and no further action is necessary for the runway portion of Site 10 (which is included in the OU2-east proposed plan).

To document elimination of the Chase Park portion of Site 10 from the CERCLA process and expedite the overall remedial process, the Navy would appreciate written agency concurrence if the agencies agree with the above position.

If you have any questions or comments, the Navy would gladly meet with you to discuss the above proposal.

Sincerely,



STEPHEN CHAO
Base Environmental Coordinator
Moffett Field

REFERENCES

International Technology Corporation (IT) 1993. Remedial Investigation Report, Operable Unit 2: Sites 3 - 11, 13, 14, 16 - 19 Soils, Volumes 1 - 4. Naval Air Station Moffett Field, Mountain View, California, May.

PRC Environmental Management, Inc. (PRC) 1993. West Side Aquifers Field Investigation Technical Memorandum, Volume I. Naval Air Station Moffett Field, Mountain View, California, March.

Copy to:

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