

5090
T4ECG/L3312
May 12, 1993

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

Subj: No Action Proposal for Operable Unit 2 - East, Naval Air Station, Moffett Field, CA

Dear Mr. Gill:

Pursuant to the results of the recently completed Naval Air Station, Moffett Field (NAS Moffett Field) Operable Unit (OU) 2-East Baseline Risk Assessment, the Navy believes that no remedial action is warranted. Therefore, the Navy proposes a no action decision for OU2-East soils.

The Incremental Lifetime Cancer Risks (ILCRs) and Hazard Indices (HIs) have been estimated for potential current and future exposure to chemicals in soil (OU2-East) at NAS Moffett Field. None of the estimated ILCRs for current or future potential exposure to organic chemicals at the nine sites within OU2-East exceeds the 10^{-6} to 10^{-4} acceptable risk range recommended by EPA.

At Site 19 (Tank 53), the total ILCR for the average case is 1.8×10^{-4} and the Reasonable Maximum Exposure (RME) case is 3.4×10^{-4} . The ILCR values reflect the sole contribution of benzene to carcinogenic risk at the site. The dominant exposure pathway is incidental soil ingestion. It is noted that the ILCR values from the Tank 53 evaluation are based on detections from the 1990 data set, yet further sampling in 1992 did not confirm the presence of benzene in the soil, and indicated considerable reduction in all other contaminant levels. Further, the Navy and EPA recently agreed to exclude Installation Restoration Program (IRP) sites containing only petroleum and petroleum related constituents from the Comprehensive Environmental Response, Compensation, and Liability Act process. Accordingly, petroleum contamination at Site 19 will be addressed through a separate corrective action outlined in the Federal Facilities Agreement revisions.

The Navy is proceeding with the assumption that a no action decision at OU2-East will be acceptable to EPA. If this is not acceptable, please advise us as soon as possible.

Sincerely,

Original signed by:

HENRY C. GEE
Deputy Team Leader, Base Closure Team

Copy to:
Department of Toxic Substances Control (Attn: Cyrus Shabahari) 930512.02
Regional Water Quality Control Board (Attn: Elizabeth Adams) 930512.03

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930512.01

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Blind copy to:

18, 18AGR, 09CMN, T4A, T4ESC, T4ECG

Admin. Record (w/2 copies)

NAS Moffett Field (Code 189, LT Openshaw)

PRC Environmental Management, Inc. (Attn: Josh Marvil)

Montgomery Watson, (Attn: Joe LeClaire)

File: MOFFETT/NAS

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