FINAL
No Further Response
Action Planned Decision Document
Environmental Restoration Program Site 13

Former Fire Training Area
Nevada Air National Guard
Reno, Nevada

April 2007

ANG/CEVR
Andrews AFB, Maryland

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April 2007

Prepared For:

Air National Guard
3500 Fetchet Avenue
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DECLARATION OF THE DECISION

Site Name and Location

ERP Site 13, Storm Drains West of Building 82
Nevada Air National Guard Base
Reno, Nevada

Statement of Basis and Purpose

The purpose of this No Further Response Action Planned (NFRAP) Decision Document is to document the Air National Guard's decision for no further action at Environmental Restoration Program (ERP) Site 13, which consists of the area around two storm drains, located west of Building 82 at Nevada Air National Guard Base (NVANG). This decision is based on review of the results of the ERP Site Investigation and groundwater monitoring studies conducted at the NVANG. These investigations determined that the site conditions do not pose a threat to human health or the environment.

Description of the Selected Remedy: No Further Action Planned

Based on the current conditions at ERP Site 13, it has been determined that no significant risk or threat to human health or the environment exists. Therefore, no further action under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended, is recommended.

Declaration Statement

This NFRAP Decision Document represents the selected action for this site. The NFRAP was developed in accordance with the general guidelines of CERCLA, as amended by the Superfund Amendments and Reauthorization Act of 1986 and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan that also applies to CERCLA response actions. This decision is also in accordance with Nevada Administrative Code 445A.226 through 445A.22755.

DECLARATION OF THE DECISION

It has been determined that the selected remedy of no further action is protective of human health and the environment. The selected remedy meets Federal and State requirements that are applicable or relevant and appropriate. The staturatory preference for further treatment is not satisfied because further treatment was not deemed necessary. Residual contaminant levels at the site have been determined to present no significant threat to human life or the environment.

SITE NAME AND LOCATION

ERP Site 13, Storm Drains West of Building 82
Nevada Air National Guard Base
Reno, Nevada

David C. Van Gasbeck, Chief
Environmental Division
Civil Engineer Directorate

Date

Jim Najima
Chief, Bureau of Corrective Action
Nevada Division of Environmental Protection

Jan 26, 2007
Date

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LIST OF ACRONYMS/ABBREVIATIONS

AGE	Aerospace Ground Equipment
ANG	Air National Guard
ASG	Automated Sciences Group, Inc.
bgs	Below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
ERM	ERM-West, Inc.
ERP	Environmental Restoration Program
°F	Degrees Fahrenheit
ft/d	Feet per day
GC	Gas chromatograph
GSM	Groundwater screening method
MCL	Maximum contaminant level
µg/kg	Micrograms per kilogram
µg/L	Microgram per liter
mg/kg	Milligram per kilogram
mg/L	Milligram per liter
NDEP	Nevada Division of Environmental Protection
NVANG	Nevada Air National Guard Base
ORNL/ETS	Oak Ridge National Laboratory/Environmental Technology Section
PA	Preliminary assessment
PAH	Polynuclear aromatic hydrocarbon
PID	Photoionization detector
RCRA	Resource Conservation and Recovery Act
RI	Remedial investigation
SI	Site investigation
SVOC	Semivolatile organic compound
TCLP	Toxicity Characteristic Leaching Procedure
TPH	Total petroleum hydrocarbons
VOC	Volatile organic compound
USEPA	United States Environmental Protection Agency

SECTION 1.0

INTRODUCTION

This decision document describes the site-specific factors and analyses that led to the selection of No Further Action as the remedy for Environmental Restoration Program (ERP) Site 13, which consists of the area around two storm drains located west of Building 82 at the Nevada Air National Guard Base (NVANG), Reno, Nevada. Documents supporting the decision are identified in Section 10.

The format and organization of this decision document are based on United States Environmental Protection Agency's (USEPA's) *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, dated July 1989. This decision document includes the pertinent elements of Nevada Division of Environmental Protection's (NDEP's) *Requirements for IRP Decision Documents*, transmitted in a letter dated 30 December 1998. This decision document is organized as follows:

- **Declaration of the Decision.** Functions as the abstract and formal authorizing signature page for the decision document.

- **Section 1.0 - Introduction.** Summarizes the purpose and organization of the decision summary portion of the decision document, identifies the site to which the decision document pertains, and clarifies the relationship of this decision document to previous versions of the decision document.

- **Section 2.0 - Site Name, Location, Description, and History.** Identifies and describes the site, provides location and property ownership information, and summarizes the site history, conditions, and previous investigation activities.

- **Section 3.0 - Community Participation.** Documents community participation activities throughout the decision-making process, references the Community Relations Plan in Appendix A, and describes the location and availability of the Administrative Record.

- **Section 4.0 - Scope and Role of Site.** Discusses Site 13 in relation to other sites at NVANG and identifies when and where monitoring or remedial activities at other sites influence, or are influenced by, monitoring or remedial activities at Site 13.

- **Section 5.0 - Site Characteristics.** Summarizes the regional, facility, and site-specific characteristics and conditions, including the concentrations and distribution of contaminants and their fate and transport.

- **Section 6.0 - Current and Potential Site and Resource Uses.** Discusses the current and potential future uses of the land.

- **Section 7.0 - Summary of Site Risks.** Discusses risks due to contamination present at the site.

- **Section 8.0 - Statutory Authority Finding.** States the conclusion that No Further Action is appropriate for Site 13.

- **Section 9.0 - Documentation of Significant Changes.** Describes the changes made to this decision document on the basis of comments received during the public comment period.

- **Section 10.0 - References.** Lists the sources of information used in preparing this decision document.

- **Appendix A - Responsiveness Summary.** Summarizes responses to public comments.

SECTION 2.0

SITE NAME, LOCATION, DESCRIPTION, AND HISTORY

The Reno Tahoe International Airport complex is located approximately 5 miles southeast of downtown Reno, Nevada (Figure 2-1). The NVANG presently occupies approximately 60 acres of land in the southern portion of the northwest quadrant of the airport complex (Automated Sciences Group, Inc. [ASG], 1989).

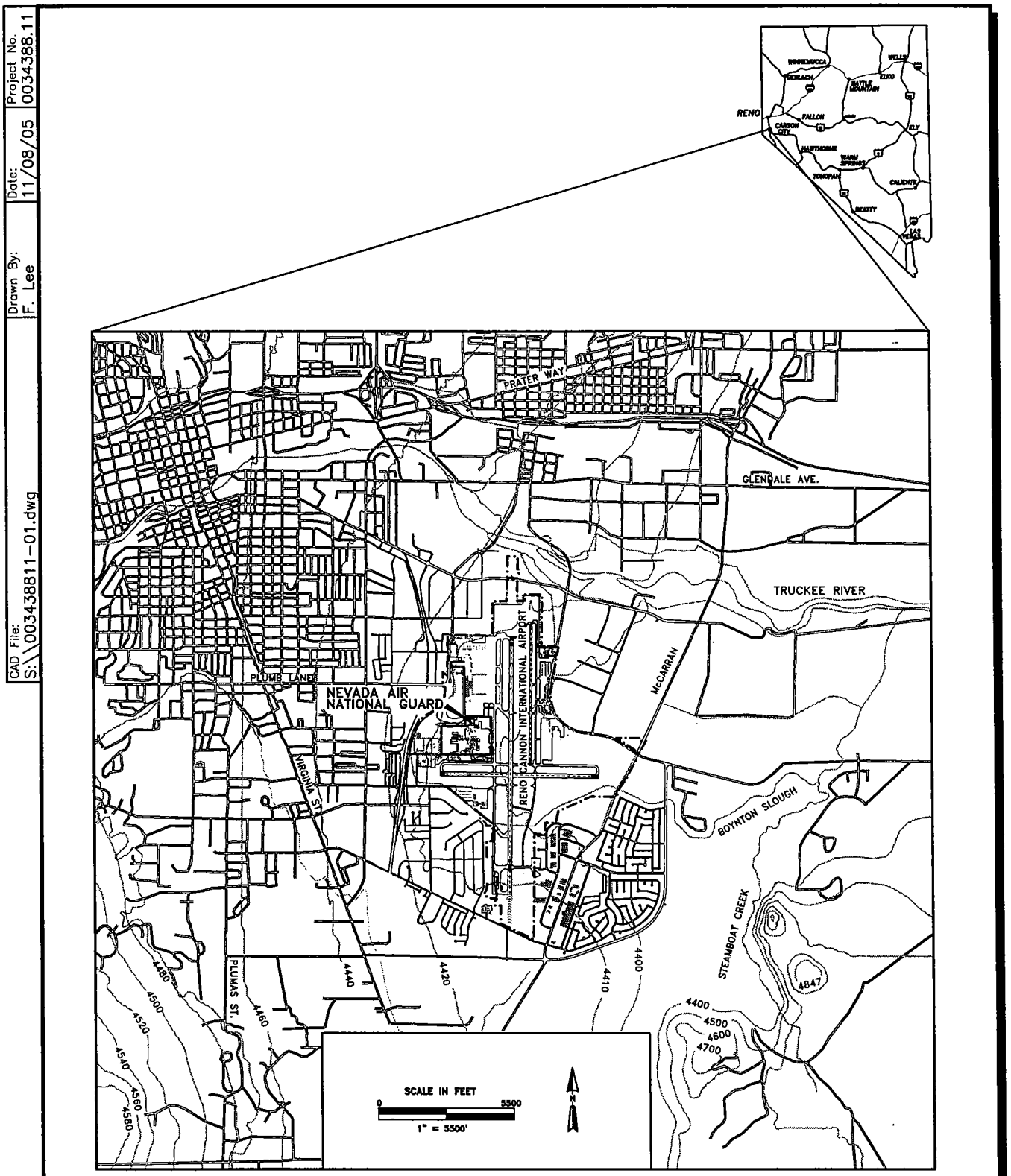
In April 1948, the NVANG was established as the 192nd Fighter Squadron. This designation was changed to the 192nd Fighter Bomber Squadron in April 1951. The unit was redesignated as the 192nd Fighter Interceptor Squadron in June 1955 and retained this designation until April 1958, when the unit was renamed the 152nd Fighter Group. In February 1961, the 152nd Fighter Group acquired the designation of the 152nd Reconnaissance Group (ASG, 1989). In 1996, the mission of the NVANG changed and it currently houses the 152nd Airlift Wing.

Initially, the NVANG was equipped with P-51 aircraft and was located at the Stead Army Air Base in Reno, Nevada. In 1953, the NVANG leased 29 acres of land at Hubbard Field (Reno/Tahoe International Airport) from the City of Reno. In 1954, NVANG operations were moved from Stead Army Air Base to their present location. F-86A aircraft were assigned to the NVANG from 1956 until 1961 when the group converted to the RB-57 aircraft. In 1965, the NVANG converted to RF-101 aircraft, which were flown until 1975 when the NVANG converted to RF-4C aircraft (ASG, 1989). Because of its change in mission in 1996, the NVANG now utilizes C-130 aircraft.

2.1 Site Description

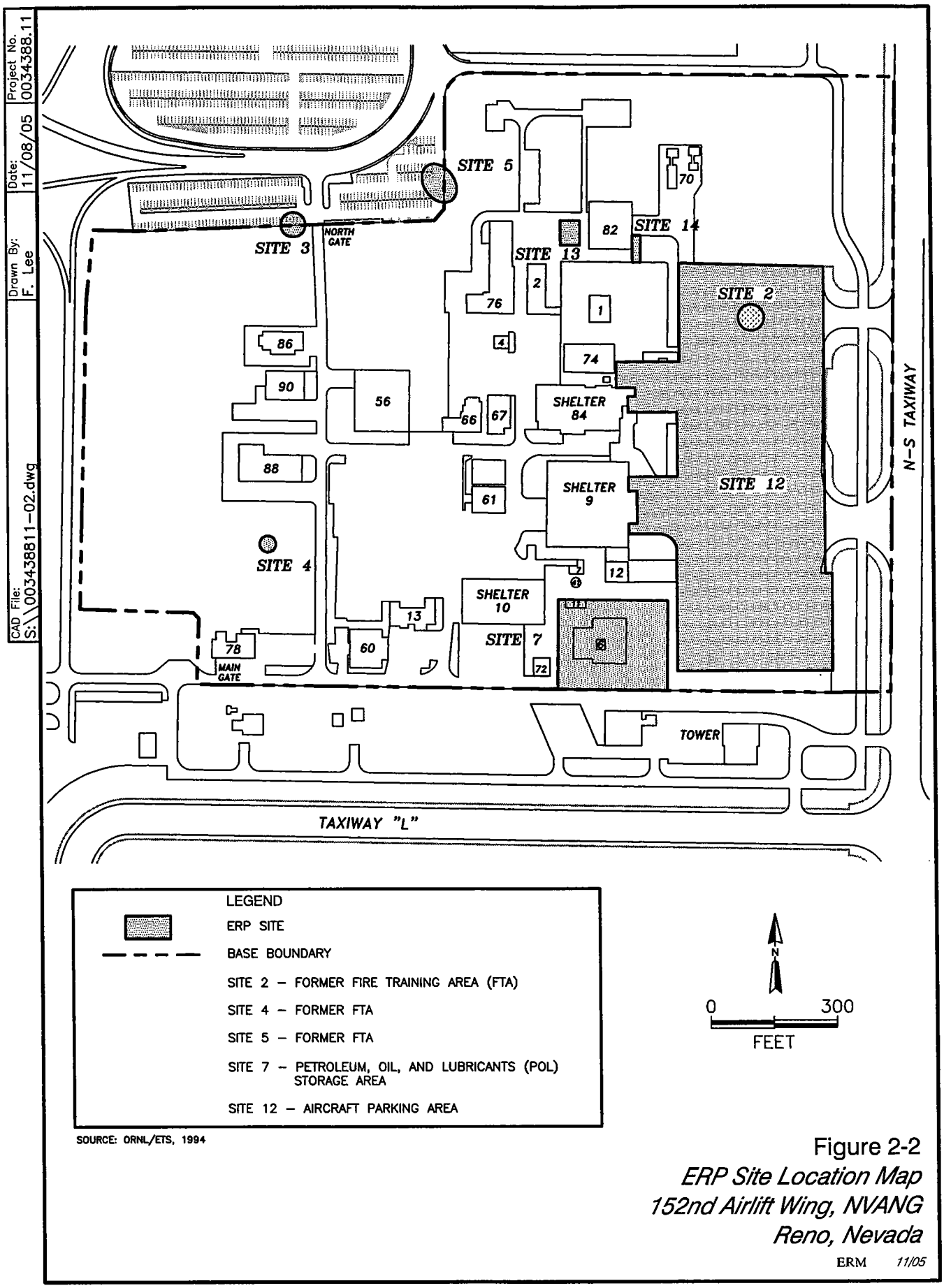
Site 13 was identified by base personnel as a former spill area and possible waste-oil disposal area.

The site includes two storm drains northeast of the Aerospace Ground Equipment (AGE) storage area, which is east of Building 2 (Figure 2-2).



SOURCE: ORNL/ETS, 1994

Figure 2-1
NVANG Location Map
152nd Airlift Wing, NVANG
Reno, Nevada
ERM *11/05*



SOURCE: ORNL/ETS, 1994

Figure 2-2
ERP Site Location Map
152nd Airlift Wing, NVANG
Reno, Nevada
ERM 11/05

Both drains are connected to a larger storm drain east of Building 82. The first drain was used as a vehicle wash area between 1966 and 1986. The second drain received runoff from the AGE storage area for more than 20 years. In addition, small quantities of oil (5 gallons or less) were occasionally spilled onto the soil surrounding the second drain. No estimate is available to assess the volume of oil, grease, or hydraulic fluid that may have been washed into the drains. Base personnel indicated that the soil surrounding the second drain may have absorbed some waste. Both drains have not been used for waste disposal or vehicle washing since 1986 (Oak Ridge National Laboratory/Environmental Technology Section [ORNL/ETS], 1994).

2.2 Site History and Enforcement Activities

The ERP is an environmental program developed by the Department of Defense to identify, assess, characterize, and clean up or control contamination from past hazardous material spills and waste disposal activities at Department of Defense sites, including Air National Guard (ANG) facilities. As part of the voluntary ERP for NVANG, the following investigations/assessment activities were completed:

- The preliminary assessment (PA) was conducted at NVANG in June 1988 (ASG, 1989). This document focused on past and present generation, use, handling, and disposal practices at seven potentially contaminated sites. The PA did not evaluate Site 13.

- A Site Investigation (SI) was completed in 1994, which included sediment/surface water sampling, soil borings, groundwater screening, piezometer and monitoring well installation, and aquifer pumping tests (ORNL/ETS, 1994). During the SI, five soil borings and three monitoring wells were installed at Site 13. The SI recommended preparation of a no further action decision document for Site 13.

- A remedial investigation (RI) was completed in 1996, which included installation of soil borings and monitoring wells. Site 13 was not evulated during the RI because the SI did not identify any significant impacts to soil or groundwater.

- Groundwater monitoring was conducted at Site 13 as part of the SI during fourth quarter 1992 and first quarter 1993.

NVANG is not listed on the National Priorities List; therefore, NDEP provides regulatory oversight. There have been no enforcement activities at the site.

SECTION 3.0

COMMUNITY PARTICIPATION

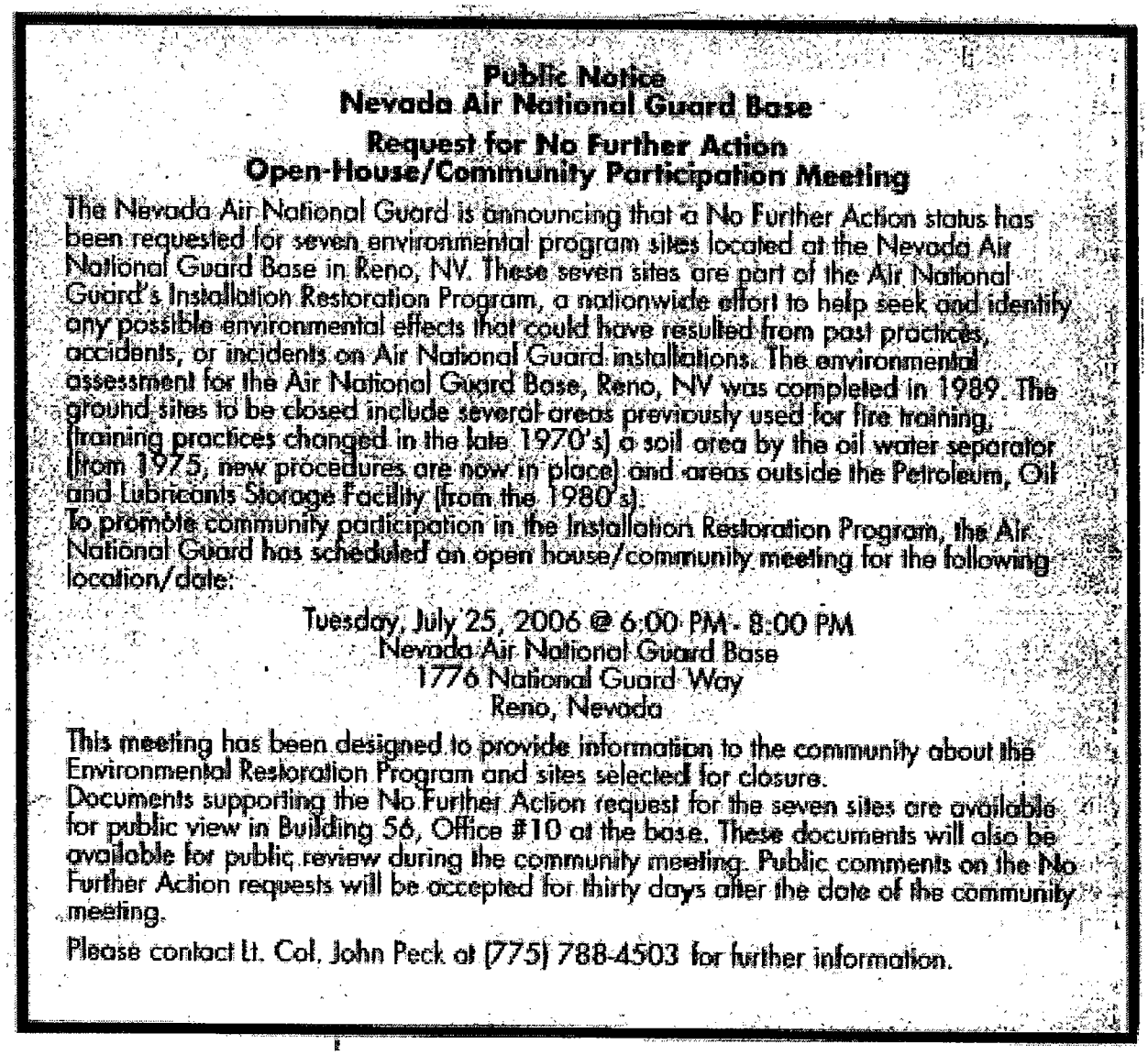
Community participation has been encouraged under a community relations plan drafted pursuant to Section 117 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The site-specific community relations plan prepared in October 1995 has been available for public review (along with all site reports) at the Washoe County Library in Reno, Nevada, and at the NVANG during normal business hours.

To meet the informational desires of the community and to allow the Reno, Nevada, area residents to participate in the decision-making process, the ANG held two Restoration Advisory Board meetings in the early stages of the ERP process at the NVANG. Although results from these meetings were positive, the number of interested parties was low and the ERP program at the NVANG was viewed by the community with little concern; therefore, no further meetings were scheduled.

To further inform the community about the Environmental Restoration Program and sites selected for closure, an open-house meeting was held at the NVANG on 25 July 2006. To announce the planned meeting, an advertisement was published in the *Reno Gazette Journal* on 21 and 22 July 2006 (Figures 3-1 and 3-2).

Information provided during the 25 July 2006 meeting included a visual presentation (which gave an historic overview of investigative work performed at Site 13) and printed handouts with similar information. In addition, draft copies of this decision document were available for review during the meeting. This meeting also marked the start of a 30-day public comment period to give interested parties an opportunity to review the documents supporting closure of Site 13.

There was no community attendance at the open-house meeting. Additionally, no community feedback was received during the 30-day comment period.



Public Notice
Nevada Air National Guard Base

Request for No Further Action
Open-House/Community Participation Meeting

The Nevada Air National Guard is announcing that a No Further Action status has been requested for seven environmental program sites located at the Nevada Air National Guard Base in Reno, NV. These seven sites are part of the Air National Guard's Installation Restoration Program, a nationwide effort to help seek and identify any possible environmental effects that could have resulted from past practices, accidents, or incidents on Air National Guard installations. The environmental assessment for the Air National Guard Base, Reno, NV was completed in 1989. The ground sites to be closed include several areas previously used for fire training, (training practices changed in the late 1970's) a soil area by the oil water separator (from 1975, new procedures are now in place) and areas outside the Petroleum, Oil and Lubricants Storage Facility (from the 1980's).
To promote community participation in the Installation Restoration Program, the Air National Guard has scheduled an open house/community meeting for the following location/date:

Tuesday, July 25, 2006 @ 6:00 PM - 8:00 PM
Nevada Air National Guard Base
1776 National Guard Way
Reno, Nevada

This meeting has been designed to provide information to the community about the Environmental Restoration Program and sites selected for closure.
Documents supporting the No Further Action request for the seven sites are available for public view in Building 56, Office #10 at the base. These documents will also be available for public review during the community meeting. Public comments on the No Further Action requests will be accepted for thirty days after the date of the community meeting.

Please contact Lt. Col. John Peck at (775) 788-4503 for further information.

Figure 3-1
Public Meeting Notice
152nd Airlift Wing, NVANG
Reno, Nevada

RENO NEWSPAPERS INC
Publishers of
RENO GAZETTE-JOURNAL
955 Kuenzli St. P.O.Box 22000 RENO, NV 89520 PHONE: (775) 788-6200
Legal Advertising Office (775) 788-6394

- ERM
- 2525 Natomas Park Dr #350
- Sacramento, CA 95833
- David - Betta

Customer Account #	313208
PO# /ID#	0000159257
Ad Cost	$2,425.50

PROOF OF PUBLICATION

STATE OF NEVADA
COUNTY OF WASHOE

ss: Julia Ketcham

Being first duly sworn, deposes and says: That as the legal clerk of the RENO GAZETTE-JOURNAL, a daily newspaper published in Reno, Washoe County, State of Nevada, that the notice:

request for no further action

has published in each regular and entire issue of said newspaper on the following dates to wit:
July 21, 22, 2006

Signed: Julia Ketcham

7-22-06

Tana Ciccotti
Notary Public

TANA CICCOTTI
Notary Public - State of Nevada
Appointment Recorded in Washoe County
No: 08-7529-2 - Expires May 16, 2010

Public Notice
Nevada Air National Guard Base
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Please contact Lt. Col. John Peck at (775) 788-4503 for further information.

Figure 3-2
Proof of Publication
152nd Airlift Wing, NVANG
Reno, Nevada

SECTION 4.0

SCOPE AND ROLE OF SITE

Based on the results of the PA and interviews with NVANG personnel, 14 sites were identified where past waste management and facility operations may have impacted shallow soil and groundwater. The PA recommended further investigation of Sites 2 through 7. Site 12 was investigated during the Rapid Response Site Assessment (PEER Consultants, 1992). Sites 2, 3, 4, 5, 7, 13, and 14 were investigated during the SI (ORNL/ETS, 1994); and Sites 4, 5, 7, and 14 were further investigated during the RI (ERM, 1996). Figure 2-2 shows the location of Site 13 in relation to other ERP sites. Per agreement between the ANG and NDEP, no further action is appropriate for Sites 2, 3, 4, 5, 12, 13, and 14. Closure requests for each of these sites will be submitted under a separate document. A remedial action (that includes source removal) is ongoing at Site 7.

As shown in Figure 2-2, Site 13 is located in the north-central portion of the NVANG and generally upgradient of Site 7, which is approximately 850 feet south of Site 13. The nearest monitoring well associated with Site 7 is MW-10, which is also approximately 850 feet south and downgradient of Site 13. Site 4 is approximately 1,000 feet southwest and cross gradient of Site 13. Sites 3 and 5 are approximately 300 to 600 feet west (upgradient) and Sites 2, 12, and 14 are approximately 150 to 950 feet east or southeast (downgradient) of Site 13.

The sampling locations used to evaluate Site 13 are as follows:

- Twenty-six groundwater screening method (GSM) sampling locations: Groundwater samples were collected from hydraulically driven, hollow steel probes that were advanced to approximately 1 foot below the top of the saturated zone. GSM sample locations at Site 13 are shown in Figure 4-1.

- Five hollow-stem auger soil borings advanced to depths ranging from 4 to 10 feet below ground surface (bgs). Soil samples were collected using a split-barrel sampler from depths ranging from 2 to 8 feet bgs. Soil boring locations are shown in Figure 4-2.

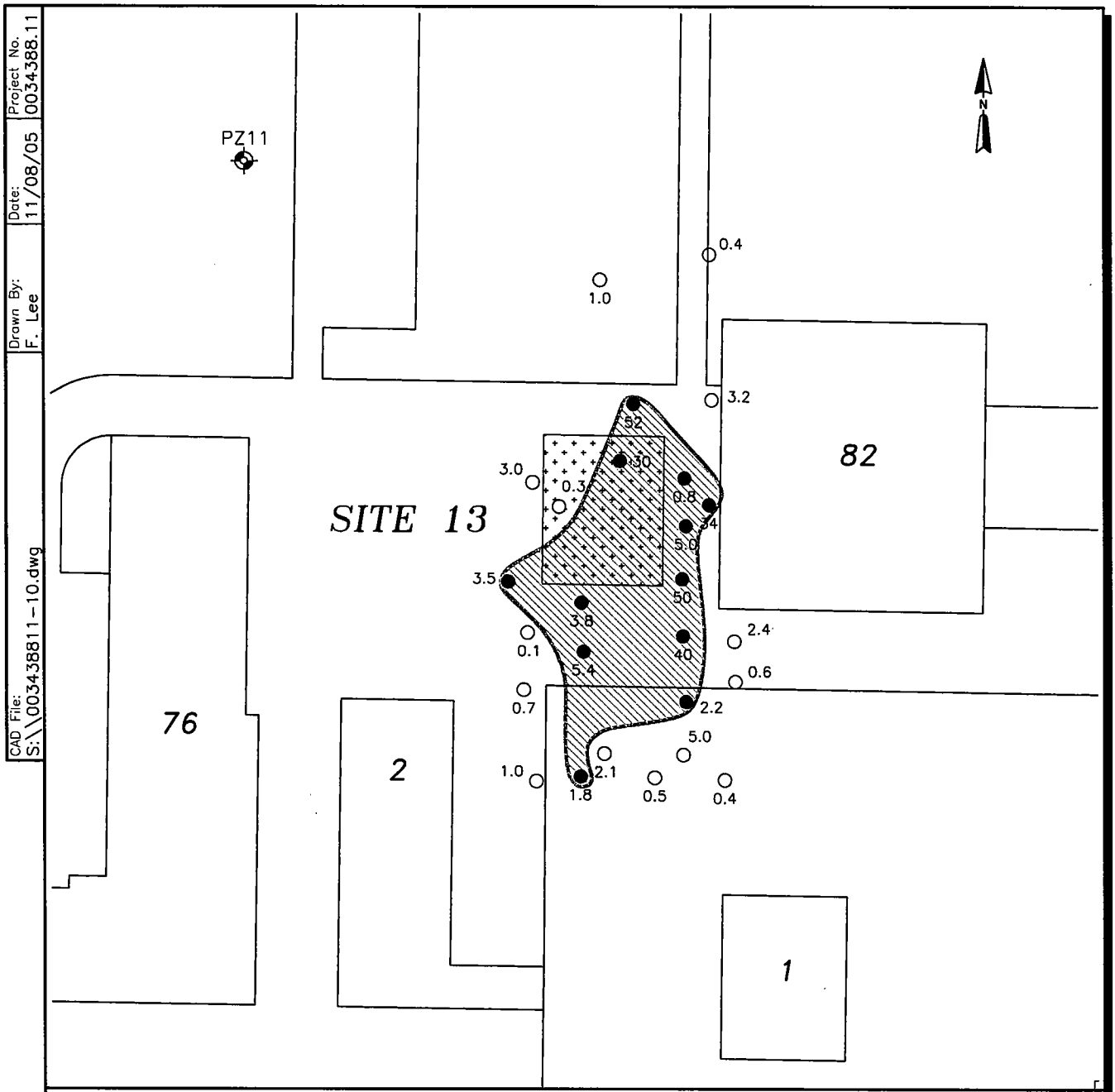

Figure 4-1
Groundwater Screening Survey and Piezometer Locations
Site 13
152nd Airlift Wing, NVANG
Reno, Nevada
ERM 11/05

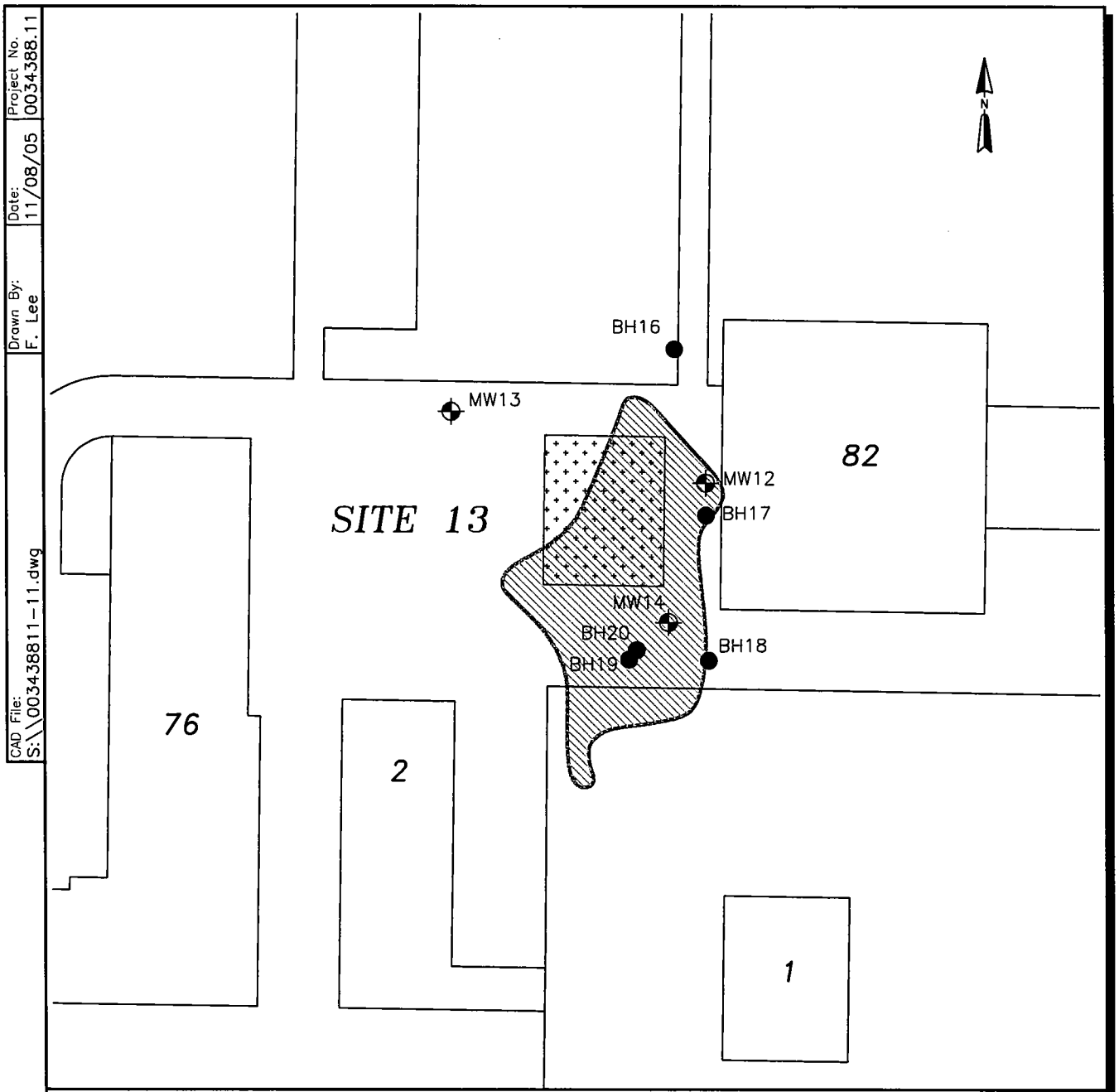

Figure 4-2
Soil Boring and Monitoring Well Locations
Site 13
152nd Airlift Wing, NVANG
Reno, Nevada
ERM 11/05

- Three permanent monitoring wells (MW12, MW13, and MW14) were installed for groundwater monitoring and sampling. Monitoring well locations are shown in Figure 4-3.

Sampling locations used as a basis for the decision for Site 13 are summarized on Table 4-1, along with the gradient relationships to Site 13 and the uses of the data from each location. Table 4-2 provides a chronological summary of quantitative sampling activities at each location.

The GSM locations were initially completed to qualitatively identify areas most likely to contain residual waste. Soil sampling was conducted to confirm the distribution of residual chemicals in soil and quantitatively identify the compounds present. Monitoring wells were installed to determine direction and gradient of groundwater flow and quantitatively identify the compounds dissolved in groundwater.

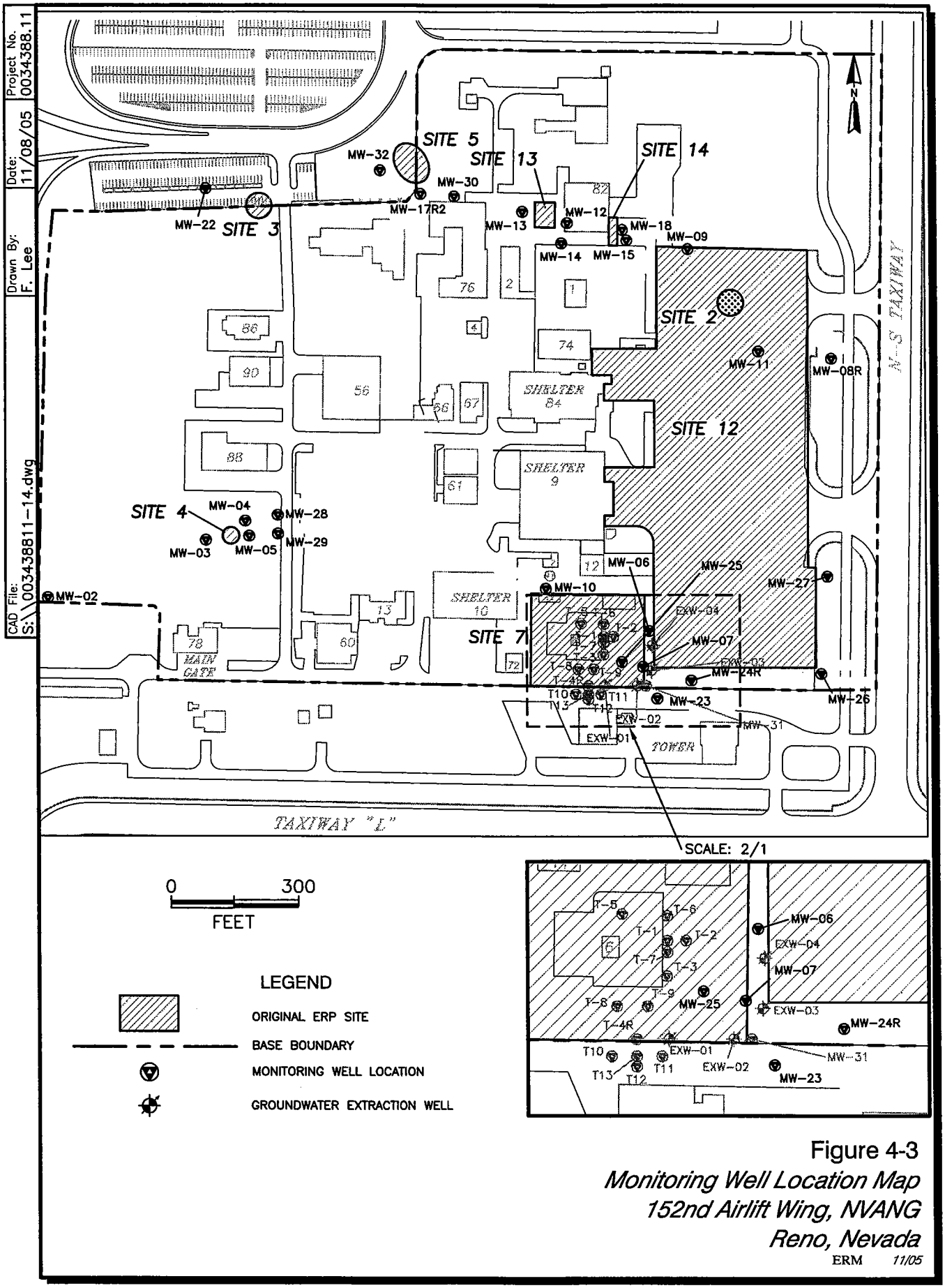

Figure 4-3
Monitoring Well Location Map
152nd Airlift Wing, NVANG
Reno, Nevada
ERM 11/05

Table 4-1

Summary of Data From Sampling Locations Used as Basis of Decision for ERP Site 13
152nd Airlift Wing
Nevada Air National Guard
Reno, Nevada

Sampling Location	Data Type	Data Uses
Within Site 13		
Two GSM locations	Qualitative	Qualitative assessment of the extent of dissolved-phase chemicals within the suspected source area
Upgradient or cross-gradient of Site 13		
Twelve GSM locations	Qualitative	Qualitative assessment of the lateral extent of dissolved-phase chemicals near the suspected source area
BH16, BH17, MW12, and MW13	Quantitative	Quantitative assessment of lateral extent of suspected area of chemicals in soil, based on GSM survey. Determination of direction and magnitude of groundwater flow. Quantitative assessment of dissolved chemical concentrations upgradient of suspected source area.
Downgradient of Site 13		
12 GSM locations	Qualitative	Qualitative assessment of the extent of dissolved-phase chemicals downgradient of the suspected source area.
BH18, BH19, BH20, and MW14	Quantitative	Quantitative assessment of lateral extent of suspected area of chemicals in soil, based on GSM survey. Determination of direction and magnitude of groundwater flow. Quantitative assessment of dissolved chemical concentrations downgradient of suspected source area.

Key:
BH - Borehole
GSM – Groundwater screening method
MW - Monitoring well

Table 4-2

Chronological Quantitative Sampling Summary for ERP Site 13
152nd Airlift Wing
Nevada Air National Guard
Reno, Nevada

Sampling Location	Matrix	Sampling Date(s)	Range of Analyses
BH16 through BH20	Soil	12/92	TPH, VOCs, SVOCs, metals
MW12, MW13, and MW14	Groundwater	12/92, 3/93	TPH, VOCs, SVOCs, metals

Key:
BH - Soil boring
MW - Monitoring well
SVOC - Semivolatile organic compound
TPH - Total petroleum hydrocarbons
VOC - Volatile organic compound

SECTION 5.0

SITE CHARACTERISTICS

This section summarizes the characteristics and conditions of the region, the facility, and the site. It describes the physical and ecological setting, climate, surface water patterns, and geology and hydrogeology, as well as the nature and extent of contamination and the fate and transport of chemicals of concern.

5.1 Topography

The average elevation of Truckee Meadows, where the NVANG is located, is 4,400 feet above mean sea level. The area around Truckee Meadows is generally flat with a gentle slope to the west, although topographic relief is substantial in the surrounding mountain ranges (ASG, 1989).

5.2 Climate

The annual mean temperature for Reno, Nevada, is 49.9 degrees Fahrenheit (°F) with a maximum monthly average of 91.3°F occurring in July and a minimum monthly average of 18.9°F occurring in December. The average daily temperature change is 35°F with a maximum daily temperature change of 43.5°F occurring in July and August (ASG, 1989).

National Oceanic and Atmospheric Administration Station No. 26-6779, located at Reno Tahoe International Airport, records an average annual precipitation of 7.49 inches for the Reno, Nevada, area. According to the Water Atlas of the United States, Plate 12, the average annual evaporation from open water surfaces is 43 inches (ASG, 1989). Using the method outlined in the Federal Register (47 Federal Regulation 31224, July 1982), the annual net precipitation for the NVANG is -35.51 inches (ASG, 1989). Rainfall intensity based on the 1-year, maximum 24-hour rainfall is calculated to be 1.5 inches (ASG, 1989).

5.3 Geology

5.3.1 Regional Geology

The majority of the information presented in the following subsections was obtained from Cohen and Loeltz (1964), Bingler (1975), and the PA (ASG, 1989), which contains information derived from the Nevada Bureau of Mines and Geology Report #25 (Bateman and Scheibach, 1975).

Geologic maps of the Reno and Mt. Rose quadrangles show that the northern portion of the NVANG lies on a Quaternary deposit termed "floodplain and lacustrine deposits" consisting of interbedded gray to pale grayish-yellow silt and fine-grained sand with thin lenses of peat. These are fluvial and lacustrine deposits up to 23 feet thick with little or no soil development (Bonham and Rogers, 1983). The southern portion of the airfield is underlain by deposits known as "alluvial bajada deposits" consisting of thin, sheet-like aprons of fine- to medium-grained sand with intercalated muddy, medium-pebble gravel. These deposits result from low gradient streams that have reworked older gravelly outwash and alluvial fan deposits. They are weakly weathered and largely undissected, with little or no soil development (Bonham and Rogers, 1983).

The general geology of the Reno area consists of a north-trending basin known as the Truckee Meadows. This basin is located at the western margin of the Basin and Range physiographic province just east of the Sierra Nevada. Bingler (1975) describes the Truckee Meadows as a structural depression bounded by the Carson Range on the west, the Virginia Range on the east, Steamboat Hills to the south, and the eastern part of the Peavine Mountain block to the north. These marginal blocks consist of Mesozoic metavolcanic and plutonic rocks overlain by a thick sequence of Tertiary volcanic and epiclastic rocks. The Tertiary rocks are predominantly andesite and andesite porphyry flow rock, hypabyssal intrusives, and minor siliceous welded tuff, which are commonly represented by the Kate Peak and Alta Formations.

The foothill and mountain drainages that rim the basin contain large exposures of altered volcanic rock. Along the western margin of the basin and to the north and west along the Truckee River drainage basin, tilted beds of Miocene to upper Pliocene Hunter Creek Sandstone (composed of conglomerate, sandstone, and diatomite) are exposed, marking the start of early basin-sediment accumulation. The continuation of long-established patterns of basin-sediment accumulation is represented by the extensive Quaternary deposits exposed in the Truckee Meadows.

Bingler (1975) divided the Quaternary deposits into three major categories:

- Main stream gravel deposits of the Truckee River represented by bouldery outwash from glacial activity;
- A long and complex history of alluvial fan deposition along the margins of the Truckee Meadows that extends in time from the Pleistocene into the Holocene; and
- Reworking of older deposits and deposition of fine-grained clastic debris throughout the central part of the Truckee Meadows by low gradient streams during the Holocene and continuing to the present.

Geothermal activity in Truckee Meadows is found in two major areas known as Steamboat Springs and Moana. These activities are likely due to the cooling of an intrusive body at a depth that may be connected to groundwater resources through fault systems near these areas. Geothermal activity has a profound effect on groundwater chemistry by means of hydrothermal alteration of volcanic rocks underlying Truckee Meadows.

5.3.2 Local Geology

The soil descriptions below are based on the PA (ASG, 1989) and were derived from the *Soil Survey of Washoe County, Nevada, South Part* (Baumer, 1983).

The Truckee sandy loam, gravelly substratum covers the northern half of the airport and all of the NVANG property (Baumer 1983, Map Index No. 805). This very deep, somewhat poorly drained soil is on flood plains and is formed in alluvium derived from mixed rock sources. Typically, the surface layer is gray sandy loam about 12 inches thick. The upper 18 inches of the underlying material is gray, stratified sandy loam through silty clay loam. The lower part, to a depth of 60 inches, is a pale-brown, stratified, gravelly sand and very gravelly sandy loam. Depth to the gravelly material ranges from 30 to 40 inches.

The Vamp silt loam, which is strongly saline-alkali, covers the southern half of the airport and adjacent areas (Baumer, 1983, Map Index No. 911). This is a moderately deep, somewhat poorly drained soil found on flood plains and terraces. The soil is formed in alluvium and is derived from mixed rock sources. Typically, the surface layer is grayish-brown silty loam about 3 inches thick. Below this is a layer of light grayish-brown and

pale-brown, stratified, fine sandy loam and loam about 33 inches thick. The next layer is white, strongly cemented hardpan about 6 inches thick, which is underlain to a depth of 60 inches by yellowish-brown and light olive-gray, stratified loam, sandy loam, and loamy sand. Depth to the hardpan ranges from 20 to 40 inches. Permeability of the Vamp soil is moderate. A seasonal high water table is at a depth of 30 to 40 inches in spring and early summer.

Channeling and deposition are common along stream banks in both soil units. The risk of corrosion is high for uncoated steel and concrete structures because both soil units are strongly saline and alkaline affected. Both soil units are subject to seasonal flooding that has been controlled around the NVANG by deepened drainage ditches.

5.4 Hydrology

The following subsections describe the surface water hydrology and the hydrogeology of the NVANG.

5.4.1 Surface Water Hydrology

Surface water in the vicinity of the NVANG occurs in both open and covered drainage ditches. Irrigation ditches fed by diversion dams on the Truckee River pass by the NVANG just east of the airfield. There are drainage ditches along the north and south sides of the NVANG that conduct water to the east, across the airfield, and into Boynton Slough, which drains into Steamboat Creek (ASG, 1989).

The Truckee Meadows is drained by the Truckee River, which flows from west to east through the Meadows. The NVANG lies 1.5 miles south of the river channel at its closest point. Steamboat Creek, the major tributary to the Truckee River within the Meadows, enters through Pleasant Valley to the south and flows north to the Truckee River. Other streams in this area flow mainly during spring runoff (ASG, 1989).

5.4.2 Hydrogeology

The potentiometric surface at the NVANG can be as shallow as 3 feet below the land surface. The fine-grained nature of the upper sediments compared with the more permeable lower sediments may result in confined conditions across the NVANG. The proximity of the groundwater surface to the land surface is due to the area's function as a

groundwater discharge point for the Truckee Meadows. Much of the NVANG and airport lie on former swampland that was filled in and drained with ditches that receive the current groundwater discharge. Cohen and Loeltz (1964) estimated the total groundwater discharge into the drainage ditches, drains, and sloughs east of the airport to be 6,500 acre-feet per year (acre-feet/year) with an additional 2,200 acre-feet/year discharged to drains immediately north of the airfield. Today, the only remaining swampland, located east of the NVANG, is found south of the confluence of Boynton Slough and Steamboat Creek.

Groundwater in the Truckee Meadows occurs under both artesian and water table conditions in the unconsolidated and partially consolidated younger and older alluvium of the valley fill. Artesian heads in the Meadows area are commonly less than 20 feet above the land surface (Cohen and Loeltz, 1964). Depths to groundwater vary considerably due to the interfingering nature of the valley-fill deposits. Several public water supply wells located in the Meadows are screened at depths ranging from 274 feet to more than 800 feet. Commonly, wells located several yards apart will tap water-bearing deposits at different depths. This trend becomes more pronounced in the area of the Truckee River, where channel shifts have left discontinuous and sinuous gravels (ASG, 1989).

Review of Nevada Department of Water Resources drilling records, stored by the United States Geological Survey Water Resources Division in Carson City, Nevada, indicates that there are 90 monitoring wells within a 1-mile radius of the NVANG. None of these wells are considered private supply wells, as they are less than 30 feet deep and constructed as monitoring wells related to environmental site assessments in the airport area. Because shallow groundwater in this area contains high concentrations of naturally occurring inorganic compounds, there are no known private drinking water wells near the NVANG.

Cohen and Loeltz (1964) suggest that 70 percent of the recharge to the groundwater in the Truckee Meadows is from infiltration by crop irrigation practices and 30 percent can be attributed to the infiltration of streamflow and underflow from tributary valleys. Increasing urbanization in the Meadows, however, has decreased the use of crop irrigation, thus decreasing the rate of recharge and consequently lowering water levels. The State Engineer's Office in Carson City estimates the present annual groundwater recharge to the Truckee Meadows at 20,000 to 25,000 acre-feet.

During the SI, single well pumping tests were performed on six monitoring wells, and recovery tests were performed on two wells. Transmissivity values calculated from the pump test data ranged from 39 to 3,110 square feet per day (ft/d). Hydraulic conductivities, defined as the product of the screened aquifer thickness and transmissivity, ranged from 4 to 479 ft/d. The range of values indicates the lithology of the unconfined saturated zone is very heterogeneous. This conclusion is consistent with data from borehole logs. Using an average hydraulic conductivity value of 500 ft/d, a gradient of 0.001, and effective porosity of 0.2 (fine to coarse sand), the SI Report calculated an average linear groundwater velocity of 2.5 ft/d (ORNL/ETS, 1994).

Figure 5-1 shows the potentiometric surface map developed based on the last semiannual monitoring event (third quarter 2003). As indicated, groundwater flow is east or east-southeast. Gradient in the vicinity of Site 13 is estimated at approximately 0.0013 feet per foot. These results are consistent with groundwater gradient and flow directions observed during previous events (ERM, 2003a).

5.5 Cleanup Levels for Soil and Groundwater

Cleanup levels for impacted soil and groundwater at NVANG (created for the RI/Feasibility Study) were calculated for protection of both human health (assuming direct contact with soil) and groundwater. Direct contact standards were calculated following the methodology established in Subpart S of the Resource Conservation and Recovery Act (RCRA) Corrective Action Rule (USEPA, July 1990). Cleanup levels for protection of groundwater were calculated based on (1) Toxicity Characteristic Leaching Procedure (TCLP) standards; (2) Federal Maximum Contaminant Levels (MCLs); or (3) a drinking water equivalency level using Subpart S methodology. Where available, the numeric TCLP standard (in milligrams per liter [mg/L]) was selected as the groundwater protective cleanup level (in milligrams per kilogram [mg/kg]) without any unit conversion. For compounds with no established TCLP standard, the cleanup levels were calculated by multiplying the MCL (in mg/L) by 100. For compounds with no established TCLP standard or MCL, a drinking water equivalency standard (in mg/L), calculated using Subpart S methodology, was multiplied by 100 to derive the soil cleanup level (in mg/kg). Table 5-1 summarizes cleanup levels for protection of human health and groundwater for Site 13 soils. Groundwater protective cleanup levels are preferred because they are more conservative than the human health cleanup levels for the chemicals of concern.

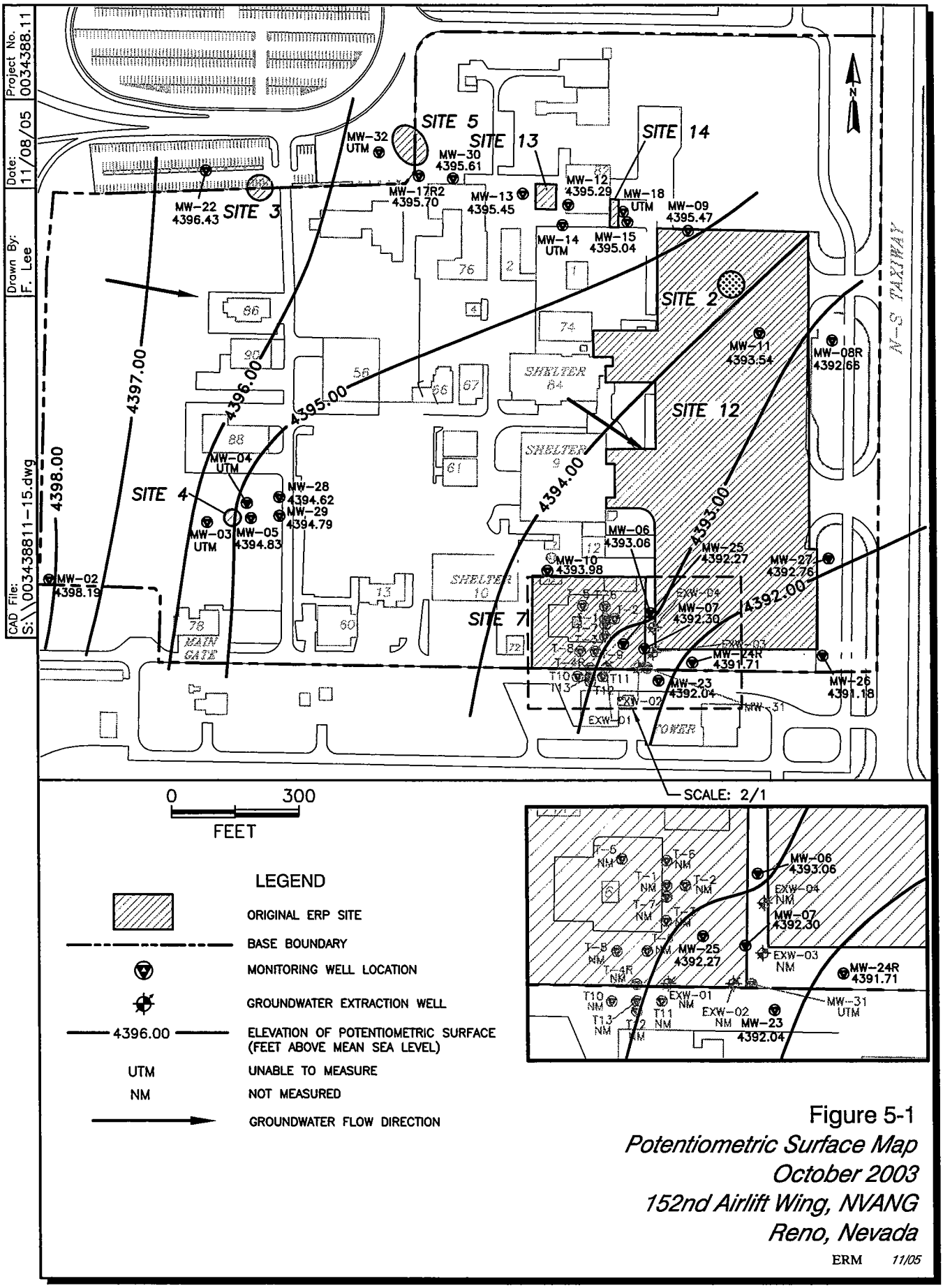

Figure 5-1
Potentiometric Surface Map
October 2003
152nd Airlift Wing, NVANG
Reno, Nevada
ERM 11/05

Table 5-1
Summary of Soil Cleanup Levels
ERP Site 13
152nd Airlift Wing, Nevada Air National Guard
Reno, Nevada

Compound	Human Health Cleanup Level (Based on Subpart S)	Groundwater Protection Cleanup Level	Groundwater Protection Cleanup Level Method
Volatile Organic Compounds (micrograms per kilogram)			
2-Butanone	48,000,000	200,000	TCLP
Chloroform	120,000	6,000	TCLP
Semivolatile Organic Compounds (micrograms per kilogram)			
Benzo(a)anthracene	960	200	MCL x 100
Benzo(a)pyrene	96	200	MCL x 100
Benzo(b)fluoranthene	960	200	MCL x 100
Benzo(k)fluoranthene	9,590	200	MCL x 100
Bis(2-ethylhexyl)phthalate	50,000	600	MCL x 100
Chrysene	96,000	480	Subpart S x 100
Fluoranthene	3,200,000	140,000	Subpart S x 100
Phenanthrene	3,200,000	140,000	Subpart S x 100
Pyrene	2,400,000	110,000	Subpart S x 100
TPH (milligrams per kilogram)	4,800	210	Subpart S x 100

Key:
MCL = Maximum contaminant level
TCLP = Toxicity characteristic leaching procedure
TPH - Total petroleum hydrocarbons

The SI (ORNL/ETS, 1994) compared detected concentrations of inorganic constituents (metals) to background concentrations to determine whether further action was necessary to address metals in soil. Background concentrations for metals were derived from two sources: (1) the range of detected concentrations in seven soil samples taken from soil borings drilled in areas where it was reasonably certain there was no impact; and (2) crustal abundance average concentrations reported in *Abundance of Chemical Elements in Continental Crust* (Taylor, 1964). The SI concluded that concentrations of metals in ERP Sites soil were within normal background ranges. Based on these results further assessment was deemed unnecessary, and metals were not subsequently evaluated in the RI (ERM, 1996).

Consistent with NDEP guidance, potential cleanup levels identified in the SI and RI for groundwater were based primarily on Federal MCLs. For several compounds with no established MCLs, the RI derived drinking water equivalency levels using the methodology set forth in Subpart S of the proposed RCRA Corrective Action Rule (EPA, 1990). In addition, the SI compared concentrations of inorganic constituents (metals) to concentrations measured in nonimpacted background wells and concentration ranges for metals and cations in groundwater determined by Welch and others (1989) for the Carson River Basin.

The cleanup levels identified in the SI and RI were used to determine whether further action was necessary. Although these cleanup levels provided the basis for recommending no further action at Sites 2, 3, and 13 in the SI and long term monitoring for Site 14 in the RI, it should be noted that the SI and RI did not identify groundwater cleanup levels for some compounds. To allow a comprehensive evaluation of all detected constituents, either the current Federal MCL or the current Region 9 PRG has been selected as the cleanup level for these compounds. Table 5-2 summarizes cleanup levels for all constituents detected in Site 13 groundwater. The RI report (ERM, 1996) contains further details on calculation of soil and groundwater cleanup levels.

5.6 Nature and Extent of Contamination

This section summarizes results of investigations at Site 13 and discusses, in detail, contaminants in soil and groundwater. Investigations at the site are summarized in Section 2.

Table 5-2

Summary of Groundwater Cleanup Levels
ERP Site 13
152nd Airlift Wing, Nevada Air National Guard
Reno, Nevada

Compound	Groundwater Cleanup Level (µg/L)	Source
	Volatile Organic Compounds	
Carbon disulfide	1,000	USEPA Region 9 Tap Water PRG
	Semivolatile Organic Compounds	
Bis(2-ethylhexyl)phthalat	6	EPA Region 9 Primary MCL
Butylbenzyl phthalate	7,300	USEPA Region 9 Tap Water PRG
Diethyl phthalate	29,000	USEPA Region 9 Tap Water PRG
	Inorganic Constituents	
Aluminum	200	USEPA Region 9 Secondary MCL
Arsenic	10	USEPA Region 9 Primary MCL
Barium	2,000	USEPA Region 9 Primary MCL
Cobalt	730	USEPA Region 9 Tap Water PRG
Copper	1,300	USEPA Region 9 Primary MCL
Iron	300	USEPA Region 9 Secondary MCL
Manganese	50	USEPA Region 9 Secondary MCL
Vanadium	36	USEPA Region 9 Tap Water PRG
Zinc	5,000	USEPA Region 9 Secondary MCL

Key:
µg/L = Micrograms per liter
MCL = Maximum contaminant level
PRG = Preliminary remediation goal
USEPA = United States Environmental Protection Agency

GSM sampling (ORNL/ETS, 1994) indicated the presence of several chlorinated and fuel-related compounds in groundwater near the suspected source area. Specific compounds could not be identified because of interference effects. The area of suspected groundwater impact overlapped and extended approximately 25 feet east and 75 feet west of the suspected source area. SI soil samples collected within the area of groundwater impact contained detectable total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs). The highest concentrations occurred in BH19, located approximately 30 feet south of the suspected source area. SI groundwater samples contained trace to low carbon disulfide, several SVOCs, and TPH.

5.6.1 Qualitative Data from GSM Sampling

Qualitative data were initially collected to assess the presence or absence of dissolved volatile chemicals in the general vicinity of the Site 13 suspected source area. GSM samples were collected from 1-inch-diameter hollow steel probes, which were driven to approximately 1 foot below the top of the saturated zone. Groundwater samples were placed in 40-milliliter vials, agitated to induce volatilization of dissolved VOCs, and the headspace gas was then analyzed using a field gas chromatograph (GC). Photoionization (PID) readings were also collected from the borehole openings at each location. GC data were recorded as either positive (detectable VOCs present) or negative (detectable VOCs not present). The GC and PID data were combined to delineate the area of likely groundwater impact. The GC and PID data are summarized on Table 5-3 and the area of impact is shown in Figure 4-1. As shown in Figure 4-1, the area of likely impact overlapped and extended approximately 25 feet east and 75 feet west of the suspected source area.

5.6.2 Quantitative Soil Data

Quantitative soil analytical data were collected during the SI to define the nature and extent of chemical impacts in the unsaturated zone.

During the SI, four soil borings (BH17 through BH20) were advanced within the footprint of likely groundwater impact, as defined by the GSM survey, and one boring (BH16) was advanced upgradient of the suspected area of ground water impact. Soil samples were collected for analysis at

Table 5-3

GSM Survey Results
ERP Site 13
152nd Airlift Wing, Nevada Air National Guard
Reno, Nevada

GSM Location	Grid Coordinates (x,y)	PID (ppm)	GC Decision
S1301	0,0	1.8	Positive
S1302	30,0	0.50	Negative
S1303	56,0	0.40	Negative
S1304	10,10	2.1	Negative
S1305	40,10	5.0	Negative
S1306	40,120	0.80	Positive
S1307	-20,120	3.0	Negative
S1308	405,100	5.0	Positive
S1309	40,80	50	Positive
S1310	40,57	40.0	Positive
S1311	40,30	2.2	Positive
S1312	-20,60	0.10	Negative
S1313	0,70	3.8	Positive
S1314	-10,110	0.30	Negative
S1315	16,127	30	Positive
S1316	20,150	52	Positive
S1317	-30,80	3.5	Positive
S1318	0,50	5.4	Positive
S1319	60,40	0.60	Negative
S1320	60,55	2.4	Negative
S1321	50,110	34	Positive
S1322	50,150	3.2	Negative
S1323	10,190	1.0	Negative
S1324	50,210	0.40	Negative
S1325	-20,-5	1.0	Negative
S1326	-23,35	0.70	Negative

Key:
GC = Gas chromatograph
GSM = Groundwater screening method
PID = Photoionization detector
ppm = Parts per million

depths ranging from 2 to 8 feet bgs. Samples were analyzed for VOCs, SVOCs, TPH, and metals. All metals results were within the background ranges reported in the SI. Table 5-4 summarizes results for organic chemicals in soil and Figure 4-2 shows the locations of the borings. As indicated, trace concentrations of chloroform (1 micrograms per kilogram [µg/kg]) were detected in two samples. 2-butanone (16 µg/kg) was detected in one sample. Other VOCs were nondetect.

Bis(2-ethylhexyl)phthalate was detected in samples from three borings (BH16 through BH18) at concentrations ranging from 62 to 220 µg/kg. The sample collected from BH19, at 2 feet bgs, contained detectable concentrations of eight polynuclear aromatic hydrocarbons (PAHs): benzo(a)anthracene (88 µg/kg); benzo(a)pyrene (70 µg/kg); benzo(b)-fluoranthene (140 µg/kg); benzo(k)fluoranthene (140 µg/kg); chrysene (75 µg/kg); fluoranthene (160 µg/kg); phenanthrene (65 µg/kg); and pyrene (130 µg/kg). TPH was detected in four samples at concentrations ranging from 0.21 to 39 mg/kg.

All reported concentrations were less than cleanup levels for protection of groundwater and human health summarized on Tables 5-1 and 5-2.

5.6.3 Groundwater Monitoring

Groundwater samples were collected from site-related monitoring wells (Figure 4-3) as part of the SI. Table 5-5 summarizes available groundwater analytical results from site-related monitoring wells. As indicated, trace to low concentrations of carbon disulfide (1 to 14 micrograms per liter [µg/L]); bis(2-ethylhexyl)phthalate (1 to 2 µg/L); butylbenzyl phthalate (1 to 2 µg/L); diethyl phthalate (1 µg/L); and TPH (20 µg/L) were detected in site-related wells. All other organic analytes were nondetect. All reported concentrations were less than the cleanup level summarized in Table 5-2.

Concentrations of aluminum and manganese in SI groundwater samples exceeded cleanup levels. However, only aluminum exceeded the range of concentrations in background groundwater samples. Based on comparison to dissolved inorganic concentrations documented by Welch and Others (1989) for the Carson River Basin, the SI concluded that all detected inorganic analytes were within naturally occurring background ranges (ORNL/ETS, 1994).

Table 5-4

Organic Chemical Constituents Detected in Soil
Site 13
152nd Airlift Wing, Nevada Air National Guard
Reno, Nevada

Chemical	BH16				BH17				BH18	BH19	BH20	
	4 ft	6 ft	6 ft (D)	8 ft	4 ft	4 ft (D)	6 ft	8 ft	3 ft	2 ft	6 ft	6 ft (D)
Volatile Organic Compounds (µg/kg)												
2-Butanone	ND	ND	ND	ND	ND	ND	ND	ND	ND	16	ND	ND
Chloroform	ND	ND	ND	1.0 J	ND	ND	ND	ND	ND	ND	1.0 J	ND
Semivolatile Organic Compounds (µg/kg)												
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	ND	ND	ND	88 J	ND	ND
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	ND	ND	ND	70 J	ND	ND
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	ND	ND	ND	140 J	ND	ND
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	ND	ND	ND	140 J	ND	ND
bis(2-Ethylhexyl)phthalate	88 J	77 J	88 J	66 J	62 J	94 J	74 J	220 J	200 J	ND	ND	ND
Chrysene	ND	ND	ND	ND	ND	ND	ND	ND	ND	75 J	ND	ND
Fluoranthene	ND	ND	ND	ND	ND	ND	ND	ND	ND	160 J	ND	ND
Phenanthrene	ND	ND	ND	ND	ND	ND	ND	ND	ND	65 J	ND	ND
Pyrene	ND	ND	ND	ND	ND	ND	ND	ND	ND	130 J	ND	ND
PHCs (mg/kg)												
Total Petroleum Hydrocarbons	39	0.21	ND	ND	ND	ND	2.8	ND	34	ND	ND	ND

Notes:
J = Reported value is below the contract required detection limit, but above the instrument detection limit. Values are estimated.
(D) = Duplicate sample

Abbreviations:
µg/kg = Micrograms per kilogram
mg/kg = Milligrams per kilogram
ND = Not detected
PHCs = Petroleum hydrocarbons

Table 5-5

Chemical Constituents Detected in Groundwater
Site 13
152nd Airlift Wing, Nevada Air National Guard
Reno, Nevada

Chemical	Background Range	MW-12 Dec-92	MW-12 Mar-93	MW-13 Dec-92	MW-13 Mar-93	MW-14 Dec-92	MW-14 Mar-93
Volatile Organic Compounds (µg/l)							
Carbon Disulfide	NA	ND	ND	ND	14	ND	1.0
Semivolatile Organic Compounds (µg/l)							
bis(2-Ethylhexyl)phthalate	NA	2.0 J	ND	1.0 J	ND	ND	ND
Butylbenzyl phthalate	NA	ND	ND	ND	2.0	ND	1.0
Diethyl phthalate	NA	ND	ND	ND	ND	ND	1.0
PHCs (mg/L)							
Total Petroleum Hydrocarbons	NA	ND	0.02	ND	ND	ND	ND
Inorganic Analytes (µg/L)							
Aluminum	ND	**216**	ND	181	ND	**213**	ND
Arsenic	84.5 - 152	16.3 J	25.9	23.2 J	23.6	14.5 J	26.7
Barium	17.7 - 39.4	44.2	33.9	40.6	43.3	37.3	40.8
Calcium	18,600 - 47,400	59,900	34,700	44,200	40,500	51,400	59,000
Copper	6.6 - 11.9	9.6	8.1	ND	10.5	7.8	14.8
Iron	55.9 - 360	66.9	ND	50.2	ND	75.2	ND
Magnesium	40 - 6,880	12,400	6,560	8,670	7,890	10,000	11,300
Manganese	15.6 - 172	**71**	15.5	24.1	ND	**86.4**	**73.9**
Potassium	2,850 - 14,500	12,100	7,470	8,970	7,910	10,300	9,840
Sodium	16,500 - 443,000	103,000	73,000	96,000	79,100	134,000	153,000
Vanadium	12.5 - 15	6	5.7	8.7	ND	10.1	7.6
Zinc	3.8 - 4.2	5.8	ND	8.4	ND	10.1	ND

Notes:
* = No established value
(1) = EPA Region 9 Maximum Contaminant Level
(2) = EPA Region 9 Tap Water Preliminary Remediation Goal
Bold = Result exceeds cleanup level.
Shading = Result exceeds background range reported in SI (ORNL/ETS, 1994)
J = Reported value is below the contract required detection limit, but above the instrument detection limit. Values are estimated.

Abbreviations:
µg/L = Micrograms per liter
mg/L = Milligrams per liter
NA = Not applicable
ND = Not detected
PHCs = Petroleum hydrocarbons

5.7 Contaminant Fate and Transport

The RI Report (ERM, 1996) evaluated the fate and transport of JP-4 constituents and trichloroethene present in soil and groundwater beneath the NVANG. The evaluation assessed potential routes of migration, contaminant persistence, and migration of these compounds.

JP-4 constituents, including TPH and PAHs (which are produced during combustion of JP-4) have been detected in vadose zone soils and groundwater at Site 13. Potential routes of migration for JP-4 constituents include the following:

- Lateral flow of floating nonaqueous-phase liquid on the water table;
- Volatilization of free-phase or adsorbed chemicals into soil gas;
- Transport of dissolved and adsorbed chemicals in surface water runoff;
- Leaching of adsorbed or free-phase chemicals in soil to groundwater;
- Volatilization of dissolved chemicals from groundwater to soil gas;
- Release of chemicals in soil gas to ambient air; and
- Transport of dissolved chemicals via groundwater flow.

Biodegradation is the primary factor reducing concentrations of fuel hydrocarbons in the environment. Indigenous bacteria, capable of metabolizing fuel hydrocarbons are ubiquitous in the environment. However, very high chemical concentrations may be toxic to bacteria and very low concentrations may be insufficient to support bacterial metabolism. Other primary factors affecting biodegradation of fuel hydrocarbons are availability of oxygen, nutrients, and moisture. Biodegradation of fuel hydrocarbons may occur under aerobic or anaerobic conditions. Volatilization of chemicals to the atmosphere and photo oxidation is also an important process affecting contaminant persistence.

For JP-4 constituents, both transport and transformation processes are important in determining the fate of chemicals in soil and groundwater. Biodegradation is considered the most important transformation process. Volatilization of VOCs in soil or groundwater to soil gas, migration of VOCs in soil gas to ambient air, leaching of VOCs and other fuel

constituents from soil to groundwater, and movement of dissolved chemicals with groundwater flow are considered the most important transport processes.

Available soil analytical data indicated residual petroleum hydrocarbons, VOCs, and SVOCs were present in soil in the vicinity of the suspected source area. However, reported concentrations are all well below cleanup levels for protection of groundwater and human health. In addition, available groundwater data from Site 13 monitoring wells indicate that dissolved impacts beneath the site are negligible. Further migration of residual chemicals in soil to groundwater is unlikely.

5.8 Basis for Decision

The ANG has selected No Further Action as the preferred alternative for Site 13.

- Several organic chemicals (2-butanone, chloroform, PAHs, and TPH) were detected in subsurface soils at Site 13, but all reported concentrations are well below cleanup levels for protection of groundwater and human health.

- Based on available groundwater data, impacts to the shallow unconfined aquifer beneath Site 13 are negligible. Several organic compounds were detected during the SI (carbon disulfide, PAHs, and TPH), but all reported concentrations are less than groundwater cleanup levels.

In summary, No Further Action is recommended for this site because there appears to be no significant ongoing source of impact to groundwater and the site does not present a risk to human health or the environment. Additionally, concentrations of organic chemicals dissolved in groundwater are now below applicable cleanup levels.

SECTION 6.0

CURRENT AND POTENTIAL SITE AND RESOURCE USES

NVANG currently serves as the home of the ANG's 152nd Airlift Wing, which services and operates C-130E and C-130H aircraft. The NVANG occupies approximately 60 acres of land in the northwest quadrant of the Reno Tahoe International Airport Complex. The land to the south and west of the NVANG is primarily industrial and residential. The land east and north of the NVANG is occupied by the Reno Tahoe International Airport. Groundwater at the site is not currently used as a drinking water resource. Use of Site 13 is not expected to change and the ANG does not expect to use groundwater at this site for any purpose in the foreseeable future.

SECTION 7.0

SUMMARY OF SITE RISKS

Analytical results from soil samples obtained in 1992 indicated only trace to low concentrations 2-butanone, chloroform, PAHs, and TPH. All detectable concentrations of organic anlaytes were well below cleanup levels for the protection of human health and groundwater.

Several organic chemicals including carbon disulfide; bis(2-ethylhexyl)-phthalate; butylbenzyl phthalate; and diethyl phthalate were detected in groundwater, but all reported concentrations are well below cleanup levels for groundwater. In addition, shallow groundwater beneath the site is not used as a potable water source. Based on these considerations, exposure to impacted groundwater is not a complete pathway.

In summary, there is no unacceptable risk to human health and the environment associated with any of the chemicals potentially attributable to releases at Site 13. Therefore, the preferred alternative for Site 13 is No Further Action.

SECTION 8.0

STATUTORY AUTHORITY FINDING

Analytical results from soil samples collected at Site 13 were below soil established cleanup levels for protection of human health and groundwater. In addition, all reported concentrations of organic chemicals dissolved in groundwater were also below cleanup levels.

Based on these observations and conditions, Site 13 does not pose an unacceptable risk to human health or the environment. Accordingly, no further action is recommended at this site. This action is in accordance with and complies with applicable statutes and regulations.

SECTION 9.0

DOCUMENTATION OF SIGNIFICANT CHANGES

No changes were made to this document following the open house community meeting and subsequent 30-day comment period.

SECTION 10.0

REFERENCES

This document was prepared with the use of information contained in the Administrative Record for Site 13, which is available for review at NVANG, Reno, Nevada. The primary documents used as sources of the information contained in this decision document are listed below.

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APPENDIX A

RESPONSIVENESS SUMMARY

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Notice of the open house meeting and public comment period was published in the *Reno Gazette Journal* on 21 and 22 July 2006. The public comment period extended from 25 July through 24 August 2006. The public meeting presenting the proposed site closure was held at the Nevada Air National Guard Base in Reno, Nevada, on 25 July 2006. As of 25 August 2006, the ANG had received no public comments on the proposed closure of Site 13.

Based on the low community response to the Restoration Advisory Board meetings, no attendance at the 25 July 2006 open house meeting, and the lack of community feedback during the 30-day comment period, there appears to be little to no community concern regarding the closure of Site 13.