



# California Regional Water Quality Control Board

## Central Valley Region

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5 July 2000

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### ***ADVANCE DRAFT WORK PLAN UNDERGROUND STORAGE TANK CLUSTER 1 SOIL VAPOR EXTRACTION PILOT TESTING, NASA CROWS LANDING FLIGHT FACILITY, CROWS LANDING, CALIFORNIA***

We have reviewed the *Advance Draft Work Plan Underground Storage Tank Cluster 1 Soil Vapor Extraction Pilot Testing, NASA Crows Landing Flight Facility, Crows Landing, California*, dated June 2000, prepared by IT Corporation and currently being revised to include Metals for groundwater analyses. The U.S. Navy is proposing to pilot test several soil vapor extraction wells, in order to assess whether chlorinated solvents are present in significant concentrations in the petroleum hydrocarbon mass. Vent wells will be tested for specific pressure, flow, recovery data and contaminant vapor sampling. Anticipated duration of all SVE testing is 3-4 months. The thermal oxidation system will be used to destroy vapor contaminants. Groundwater will also be analyzed for VOCs, TPH and Metals.

### **General Comments**

Prior to receipt of this document, we have requested that USEPA Method 7199 for Chromium<sup>+6</sup> (Cr<sup>+6</sup>) be added to the groundwater metals list of analyses. Cr<sup>+6</sup> was found recently in Investigative-derived Waste (IDW) water, which was a mixture of groundwater purged during monitoring well construction and drilling tool/sampling tool rinsate. Cr<sup>+6</sup>, unfiltered sample, was measured at 7 ug/L in one grab sample from the 7000 gallon Baker tank. Total Chromium was also found to be 28.8 ug/L from the same lot of wastewater. The Navy reported that total chromium has been historically found in monitoring wells at concentrations up to 200 ug/L, which exceeds the MCL of 50 ug/L. The Navy cannot indicate a potential source of Cr<sup>+6</sup> at this time. We request that the Navy conduct an analysis of existing groundwater data, in order to evaluate the source of the Cr<sup>+6</sup> and conduct additional metals investigations, if necessary, to delineate the lateral extent of metals contamination in groundwater.

We agree with the proposed analyses for soil vapor and groundwater. It is our understanding that metals will also be added to analyses of groundwater. We request that the most recent USEPA metals methods be used, in order to provide adequate metals detection limits for groundwater. In addition to EPA

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Method 7199, we request that the Navy use EPA Methods 200.8 (ICP/MS) or 200.9 (STGFAA), or better or equivalent methods, which will give adequate metals detection limits for investigative purposes.

### Specific Comments

1. The document states on the first faxed page, that mobilization was scheduled to occur on 17 June 2000. Since that date passed over two weeks ago, did IT Corp mobilize for this activity, and is the Navy conducting investigations without an approved Work Plan?
2. The document states on the second faxed page that groundwater sampling procedures are currently scheduled to occur coincidentally with the SVE pilot testing, beginning in August 2000. A Sampling and Analysis Plan (SAP) is currently being prepared. Please provide a schedule for document review and fieldwork for both activities.
3. Section 2.1.1 Permitting and Notification: Add RWQCB, DTSC and Stanislaus County to the list of agencies notified before mobilization of field activities.
4. Section 2.3 Individual Vent Well Sampling: The Navy's handwritten symbol (arrow) points to the section, which includes the IT Corp steps (SOP) devised for testing specific pressure, flow, and recovery data (after shut-off). We concur with this procedure.
5. Section 2.3 Individual Vent Well Sampling: Step 1 states that the thermal oxidation system will be used while extracting soil gas. USEPA has recently expressed concern that Dioxins may be produced by the combustion process at sites where commingled chlorinated solvent and petroleum hydrocarbon plumes are being treated by SVE, and thermal destruction is used to remediate the off-gas. The Navy should coordinate with DTSC to determine if dioxin testing of the treatment system effluent is required.

If you have any questions please contact me at (916) 255-3050 or [bartonj@rb5s.swrcb.ca.gov](mailto:bartonj@rb5s.swrcb.ca.gov).

  
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2000 JUL 10 P 2:49

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File: cladminrectrltr.doc

## TRANSMITTAL

Date: 16 August 2000

From: Lynn Marie Hornecker  
MCAS El Toro

To: Diane Silva  
Code 01LS.DS

**Subj: CERCLA Administrative Record Materials**  
NALF Crows Landing

*Installation:* Naval Auxiliary Landing Field, Crows Landing

*UIC Number:* ~~N00296~~ NG0211

*Document Title (or subject):* Advance Draft WORK Plan, UST Cluster 1

*Author:* James Barton, RWQCB Central Valley Region

*Recipient:* Marianna Potacka (BRAC Env Coordinator)

*Record Date:* 5 July 2000

*Approximate Number of Pages:* 2

*EPA Category:* 01.1

*Sites:* UST Cluster 1 (tank sites CL-1, CL-2, CL-3)

*Key Words:* SVE, Petroleum

*Contract:* NG2474-98-D-2076

*CTO Number:* 4