



California Regional Water Quality Control Board

Central Valley Region

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CROWS LANDING
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SOIL VAPOR EXTRACTION OPTIMIZATION FOR THE REMEDIATION OF UST CLUSTER 1 AND SITE VERIFICATION ACTIVITIES AT VARIOUS SITES WORK PLANS, REVISION 2, NATIONAL AERONAUTICS AND SPACE ADMINISTRATION (NASA), CROWS LANDING FLIGHT FACILITY, STANISLAUS COUNTY, CALIFORNIA

We have reviewed *Soil Vapor Extraction Optimization for the Remediation of UST Cluster 1 and Site Verification Activities at Various Sites Work Plans, Revision 2, NASA Crows Landing Flight Facility, Stanislaus County* (Rev 2), received 21 March 2001. Rev 2 includes, in addition to the previously reviewed *Soil Vapor Extraction Optimization for the Remediation of UST Cluster 1 and Site Verification Activities at Various Sites Work Plans* (Rev 1), Attachments 8, 9, and 10, which contain additional work plans for the Discrete Groundwater Sampling Plan (8), Site Verification at the Former and Current Sewer System (9), and Geophysical Surveys at Various Sites (10).

The Navy proposes to expand on previous work conducted at the facility in order to fully characterize contamination at multiple sites. The new Rev 2 work consists of the following:

- better characterizing the vertical and lateral extent of groundwater contamination at the Administrative Area using the hydropunch tool technique for groundwater sampling in borings,
- focusing investigations of the previous soil gas results for contaminants found at the sewer system by conducting additional passive and active soil gas surveys, and
- conducting geophysical surveys for potential unexploded ordinance burial sites and water well abandonment.

General Comment

Attachment 8 Discrete Groundwater Sampling Plan is actually a Standard Operating Procedure (SOP) that covers all aspects of groundwater sampling and well construction. Well construction is not a part of this proposed activity. Remove all text that does not pertain to the proposed project. See specific comments for additional clarification.

Specific Comments

1. Attachment 8 Discrete Groundwater Sampling Plan: This work plan does not provide enough detail in the text or figure(s) to determine where the hydropunch sampling will occur. The Navy should provide additional figures with proposed locations for the sampling and expand the text to provide the rationale for the sampling the proposed locations.
2. Attachment 9 Site Verification at the Former and Current Sewer System: The work plan proposes using Goresorber® passive soil gas modules to conduct an additional soil gas survey, in order to verify previous results. This method of testing does not correlate directly to soil gas concentrations. As a result, it may only be used for screening purposes and not verification of soil gas concentrations. All verification of soil gas concentrations, for use in any closure reports, should be done using methods that provide actual concentration data.
3. Attachment 10 Geophysical Surveys at Various Sites: Any site suspected to contain unexploded ordinance (UXO) needs a special work plan that addresses the safety concerns associated with investigating UXO. That level of detail is not provided in this work plan. The Navy should provide the UXO work plan for review and should not perform any activities that may endanger personnel until the UXO work plan has been reviewed. The Navy should use the UXO investigation guidance from the Department of Defense to prepare that work plan. Also, note that some geophysical methods may produce radio waves (RF), which may detonate UXO. The California Department of Toxic Substances is the lead state agency with respect to UXO, and they should be consulted prior to preparation of the work plan to determine any other information that may need to be addressed in the work plan. Please research this issue thoroughly.

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



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