

National Aeronautics and
Space Administration
Ames Research Center
Moffett Field, CA 94035-1000



Reply to Attn of:

QE:218-1

DEC 05 2001

Ms. Marianna Potacka
BRAC Environmental Coordinator
BRAC Operations, SWESTNAVFACENGOM
1230 Columbia Street, Suite 1100
San Diego, CA 92101

Dear Ms. Potacka:

NASA Ames Research Center has received the following document: Summary Report, Time-Critical Removal Actions, NASA Crows Landing Flight Facility, California, Administration Area Plume, IRP Site 17 dated 7 November 2001. NASA has reviewed the document. General comments are provided in this letter and specific comments are provided in Attachment 1.

The document appears to be lacking in some basic but important elements. These are discussed in the following general comments.

The purposes of the time-critical removal action (TCRA) were to remove contaminant mass from the groundwater, reduce the potential exposure to humans and animal, and reduce the potential of migration of the plume. While some mass removal has been demonstrated by the report, there is no data presented to show whether the TCRA was successful in achieving these goals. The report does not provide initial estimates of the contaminant constituents present and the percentage of the mass removed. Without such initial and final numbers, it is difficult to measure any success of the TCRA to meet its stated goals.

Aquifer tests were conducted during this TCRA. However, no evaluation of the data is presented in the report. While the appendices provide readings taken during the test and results of the analysis software used, none of this information is provided in the body of the report. The aquifer test parameters should be included in the report body and discussed as to the effects of the hydrogeology on the TCRA.

Trends of concentrations over time are not discussed or provided. Did the TCRA cause any changes over time? Such summary discussion should be included in the body of the report.

Finally, there is no conclusion to the report. Was the TCRA successful in meeting its goals? What are the implications of the data obtained from the TCRA on the future

remediation of the site? Is there any evidence of a radius of influence due to pumping?
Answers to these questions and other statements should be included as a conclusion to the report.

If you have any questions please contact me at 650-604-0237 or dchuck@mail.arc.nasa.gov.

Sincerely



Donald M. Chuck
Manager, Restoration and Subsurface Programs

Attachment

cc Lynn Hornecker, SWDIV
F. Andrew Piszkin, SWDIV
Marie Avery, SWDIV
Francesca D'Onofrio, DTSC
James Barton, RWQCB
Richard Jantz, Stanislaus County
Jim Simpson, Stanislaus County

218-1/S. Olliges
19- 12 /A. Hanif
19-21/T. Anderson

DESIGN AND DOCUMENT REVIEW - COMMENTS

COMMENTS BY Don Chuck			CODE QE	PHONE 650-604-0237	JOB ORDER NO.
PROJECT TITLE AND LOCATION Summary Report Time-Critical Removal Actions, IRP Site 17, Administration Area Plume NASA Crows Landing Flight Facility, CA Southwest Division, Naval Facilities Engineering Command 7 November 2001			DATE 12/1/2001		
					

COMMENT 1

Sect. 1, Par. 1, Next to last sent., Pg. 1

It is more correct to state that the entire plume was redesignated as a single commingled plume.

COMMENT 2

Sect. 1, Par. 4, 2nd Sent., Pg.1

Other than removing some VOC mass from the groundwater, the reduction in the potential exposure and reduction in the potential for contamination migration are not supported by the information in this report. The report does not indicate what the contaminant mass was present before starting the time-critical removal action (TCRA). Without having an initial mass to compare with, it is difficult to determine the percentage of mass removed and therefore difficult to measure the overall effectiveness of the TCRA. For example, initial concentrations of gasoline (TPH-P) is 1433 lbs (from Cluster 1, Phase 1 Design Basis Report, Definitive Design, Tetra Tech, 17 August 1999, Appendix B.2). According to this report, 24.5 lbs of gasoline were removed which is just 1.7% of the initial mass. Similar data for acetone, benzene, and the other contaminants must be included.

COMMENT 3

Sect. 3, Par. 4 (Aquifer Testing Results), 1st Sent, Pg.4

The sentence does not have a verb.

COMMENT 4

Sect. 3, Par. 8, 1st Sent., Pg. 5

In the first sentence, clarify what is meant by "excessive drawdown."

COMMENT 5

Chart 2, Pg. 8

Please provide text to explain the significance of this graph. Concentrations generally decrease with distance from the source. What information is being provided with this chart that is different from the general decrease of contamination with distance?

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BRAC OFFICE

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Transmittal

Date: 13 Dec 2001

From: Lynn Marie Hornecker
Code 06CC.LMH



To: Diane Silva
Code 01LS.DS
Administrative Record Manager

Subj: **CERCLA ADMINISTRATIVE RECORD MATERIALS**
NALF Crows Landing

Installation: NALF Crows Landing

UIC Number: N60211

Document Title: Review Comments

Author: Don Chuck, NASA

Recipient: Marianna Potacka SUDIV

Record Date: 5 Dec 2001

Approximate Number of Pages: 4

Sites: Site 17

Key Words: time-critical removal action

Contract: NA

CTO Number: NA