

Hornecker, Lynn M (EFDSW)

From: Hornecker, Lynn M (EFDSW)
Sent: Thursday, December 13, 2001 8:55 AM
To: 'dchuck@mail.arc.nasa.gov'
Cc: 'solliges@mail.arc.nasa.gov'; 'bartonj@rb5s.swrcb.ca.gov'; 'fdonofri@dtsc.ca.gov'; 'jimsimpson@envres.org'; Potacka, Marianna K (EFDSW)
Subject: Responses to NASA Comments, TCRA Summary Report, NASA Crows Landing Flight Facility

Hello Don,

I have attached the Navy's responses dated 12 December 2001 to the NASA comments pertaining to the Summary Report dated 7 November 2001 for Time-Critical Removal Actions at NASA Crows Landing Flight Facility.

Thank you for reviewing the Summary Report and for providing the comments. Please do not hesitate to call if you have questions pertaining to the attached responses.



CLResponsestoNASAc
mtsTCRA1summ...

V/R
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13 December 2001

LYNN MARIE HORNECKER
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 FILE: CLResponsestoNASAcmtsTCRA1summary.doc

RESPONSES TO COMMENTS FROM THE NATIONAL AERONAUTICS AND SPACE ADMINISTRATION

**SUBJECT: SUMMARY REPORT, TIME-CRITICAL REMOVAL ACTIONS, NATIONAL AERONAUTICS AND SPACE ADMINISTRATION (NASA)
 CROWS LANDING FLIGHT FACILITY, CALIFORNIA
 ADMINISTRATION AREA PLUME, INSTALLATION RESTORATION PROGRAM SITE 17 DATED 7 NOVEMBER 2001**

DATE OF RESPONSES: 12 DECEMBER 2001
 PAGE 1

Comment	Response
<p>Comments dated 1 December 2001 prepared by Don Chuck, National Aeronautics and Space Administration (transmitted by NASA letter on 4 December 2001)</p> <p>Subject: Summary Report, Time-Critical Removal Actions, IRP Site 17, Administration Area Plume, NASA Crows Landing Flight Facility, CA</p> <p>Addressee: Marianna Potacka, BRAC Environmental Coordinator, BRAC Operations, SWESTNAVFACENGCOM, San Diego, CA</p>	
<p>General Comments</p> <p>NASA Ames Research Center has received the following document: <u>Summary Report, Time-Critical Removal Actions, NASA Crows Landing Flight Facility, California, Administration Area Plume, IRP Site 17</u> dated 7 November 2001. NASA has reviewed the document. General comments are provided in this letter and specific comments are provided in Attachment 1.</p> <p>The document appears to be lacking in some basic but important elements. These are discussed in the following general comments.</p> <p>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.</p> <p>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</p>	<p>Responses to General Comments.</p> <p>Thank you for reviewing the Summary Report and for providing comments.</p> <p>The Navy implemented the time-critical removal actions in order to remove contaminant mass from a potential drinking water supply. The Navy removed contaminant mass from the groundwater during the implementation of the time-critical removal actions and mass removal estimates were included in the Summary Report.</p> <p>The Summary Report was written in order to document the field and laboratory testing activities, groundwater extraction activities, and the community relations program activities that were conducted during the implementation of the time-critical removal actions.</p> <p>The Summary Report states that hydrogeological data that was collected during the implementation of the time-critical removal actions will be evaluated and discussed in separate reports (page 2 of the Summary Report).</p> <p>For clarification, the Summary Report was not intended to evaluate previously published contaminant mass estimates or to provide new estimates of contaminant mass in the groundwater.</p>

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<p>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.</p> <p>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.</p> <p>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.</p>	

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Comment	Response
<p>COMMENT 1 Sect. 1, Par. 1, Next to last sent., Pg. 1</p> <p>It is more correct to state that the entire plume was redesignated as a single commingled plume.</p>	<p>Response to Comment 1. Comment acknowledged.</p>
<p>COMMENT 2 Sect. 1, Par. 4, 2nd Sent., Pg.1</p> <p>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.</p>	<p>Response to Comment 2.</p> <p>VOC mass was removed from the groundwater during the implementation of the time-critical removal actions and mass removal estimates were included in the Summary Report.</p> <p>The Action Memorandum describes the time-critical removal actions. The Action Memorandum does not state that calculation of total contaminant mass in the aquifer is an objective of the time-critical removal actions.</p> <p>Previously published contaminant mass estimates, such as the estimates presented in the design documentation prepared by Tetra Tech on behalf of the Navy, have not been confirmed by the Navy team.</p>
<p>COMMENT 3 Sect. 3, Par. 4 (Aquifer Testing Results), 1st Sent, Pg.4</p> <p>The sentence does not have a verb.</p>	<p>Response to Comment 3. Comment acknowledged.</p>
<p>COMMENT 4 Sect. 3, Par. 8, 1st Sent., Pg. 5</p> <p>In the first sentence, clarify what is meant by "excessive drawdown."</p>	<p>Response to Comment 4.</p> <p>Excessive drawdown was intended to convey the condition where the water level fell to a level below the base of the pump within a few minutes of pumping. This condition was observed at wells CL1-MW-12(S) and CL1-MW-16(S). Pumping was conducted at very low rates (less than 1 gallon per minute (gpm), as low</p>

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Comment	Response
	as 0.3 gpm); however, continuous flow and a stable pumping rate could not be maintained. As stated on page 5 of the Summary Report, the field records from the testing activities were included in Attachment 1 to the Summary Report.
<p>COMMENT 5 Chart 2, Pg. 8</p> <p>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?</p>	<p>Response to Comment 5.</p> <p>Chart 2 shows that the highest contaminant concentrations were located in the area where groundwater was extracted during the time-critical removal actions. Chart 2 shows that the relatively high concentrations are present near the source and that the relatively high concentrations are not present throughout the plume.</p>

Transmittal

Date: 13 Dec 2001

From: Lynn Marie Hornecker *LMH*
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:

Responses + Comment from NASA

Author: *Lynn Marie Hornecker SWDIV*

Recipient: *Don Chuck NASA*

Record Date: *12 Dec 2001 (with e-mail transmittal dated 13 Dec 2001)*

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