



California Regional Water Quality Control Board

Central Valley Region

Robert Schneider, Chair



Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

Sacramento Main Office

Internet Address: <http://www.swrcb.ca.gov/~rwqcb5>
3443 Routier Road, Suite A, Sacramento, California 95827-3003
Phone (916) 255-3000 • DOD FAX (916) 255-3052

14 January 2002

Ms. Marianna Potacka
BRAC Environmental Coordinator
BRAC Operations, SWESTNAVFACENGCOM
South West Division
1230 Columbia St., Suite 1100
San Diego, California 92101

INTERIM DATA SUMMARY AND PROPOSED SAMPLE LOCATIONS, INSTALLATION RESTORATION PROGRAM SITE 11A – SEWER SYSTEMS, NATIONAL AERONAUTICS AND SPACE ADMINISTRATION CROWS LANDING FLIGHT FACILITY, STANISLAUS COUNTY

We have reviewed the *Interim Data Summary and Proposed Sample Locations, Installation Restoration Program (IRP) Site 11A – Sewer Systems, National Aeronautics and Space Administration (NASA) Crows Landing Flight Facility, Stanislaus County* (Report), dated 29 November 2001. The Report summarizes the passive soil gas survey conducted from June 2001 through August 2001, at the Administration Area Plume (IRP Site 17) and former Sewer System (IRP Site 11A). The Navy conducted a Gore-sorber® passive soil gas survey, to identify potential source locations for a carbon tetrachloride (CT) spill (IRP Site 17), and the UST 109 petroleum release (benzene-ethylbenzene-toluene-xylenes and acetone - IRP Site 11A). The Report also provides proposed soil sample locations, based on the soil gas results and previous soil sampling, at UST 117 and UST CL-40, a former incinerator (IRP Site 11A), oxidation basins (Site 11A), and sludge drying beds outlet (Site 11A). The Report also states that the soil sampling will begin in mid-December 2001.

The Report included a bound copy of the Gore-sorber® passive soil gas report titled *Site Reference: NASA Flight Facility, Crow's Landing, CA, Gore Production Order Number: 10742661*, and the Report placed loosely in the binder cover pocket with the cover letter.

General Comments:

1. In our 20 March 2000 letter (General Comment 1 and Specific Comment 1), we requested development of an agreed upon process similar to the US Air Force Start/Stop Criteria for Soil Vapor Extraction (SVE). The SVE Start/Stop criteria are used at other Department of Defense sites, and can be used at Crows Landing sites, including UST 117, to determine whether additional SVE is necessary or feasible. The SVE Start/Stop Criteria are based on soil vapor results. Limited soil sampling, as proposed in the Report, is not adequate to locate source areas and determine whether SVE should be initiated, continued, or discontinued.

2. We have previously requested, on numerous occasions, that the Navy provide adequate report review and comment time from the regulatory agencies, prior to scheduling field activities. We have also requested a detailed schedule of site activities and document reviews. The review time allowed for this document was not adequate.

3. The Report title suggests that the focus of the entire document is the IRP Site 11A – Sewer Systems. Please revise the title by placing *IRP Site 11A – Sewer Systems* after *Interim Data Summary*, and include all of the sites to be investigated after *Proposed Sample Locations*.

4. We suggest that future documents be presented bound under one cover (binder) and title for the entire document, or be split up into individual binders as separate deliverables, as necessary.

Specific Comments:

1. The Report gives different rationale for the proposed sampling in various sections, namely the text on the third page (unnumbered), a table labeled Proposed Soil Sample Locations, and the Appendix A, Site-Specific Groundwater Sampling Forms (Forms used for soil samples). The text states that soil samples will be collected from the UST 117 site to evaluate current soil conditions and determine the risk associated with contaminants remaining in soil above the groundwater table. The Form, UST 117, page 1 gives the Sample Collection Rationale as evaluating the decrease in petroleum soil concentrations and determine the associated risk from remaining contaminants. The Form states that the purpose of the investigation is verifying remaining soil concentrations at the soil vapor extraction (SVE) locations, to support site closure.

UST 117 is now included as part of the Administration Area groundwater plume. UST 117 soils were subjected to long-term SVE testing in 1998. To support a No Further Action request for UST 117 soil and SVE, active soil gas samples, not soil samples, will need to be collected at UST 117. Analytical results of the active soil gas data will need to show that there is no threat to water quality from the remaining contaminants in the UST 117 soils, or that continued SVE is not technically and economically feasible, when compared to the cost of additional groundwater cleanup (see General Comment 1). Please revise the Work Plan to conduct active soil gas sampling, to provide quantitative soil gas data for evaluating remaining risk to water quality from contaminated soil and the feasibility of continued SVE.

2. Appendix A, Site Specific Groundwater Sampling Form, Site 17, page 1: The figure shows the three proposed soil sampling locations at the potential CT source location.

We are also concerned that only three soil sample locations have been chosen to evaluate the 200 foot diameter, higher concentration, soil gas plume area delineated by the Gore-sorber® passive soil gas survey as the potential CT source area. As previously stated, we will not accept soil sampling results to determine risk associated with remaining soils, or to support closure of soil in the Administration Area IRP Site 17. Please refer to General Comment 1 and Specific Comment 1.

Ms. Marianna Potacka
Department of the Navy

- 3 -

14 January 2002

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



James L. Barton, R.G.
Associate Engineering Geologist

cc: Ms. Francesca D Onofrio – CALEPA-DTSC
Mr. Jim Simpson – Stanislaus County DER
Mr. Donald Chuck, NASA
Ms. Lynn Hornacker – US Navy SWDIV

Transmittal

Date: 22 Jan 02

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: Interim Data Summary

Author: James Barton RWQCR

Recipient: Marianne Potacka

Record Date: 14 January 2002

Approximate Number of Pages: 4

Sites: ~~Site 11A~~ Site 11A

Key Words: sewer systems

Contract: N/A

CTO Number: N/A