



California Regional Water Quality Control Board

Central Valley Region

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REVISED DRAFT FINAL FEASIBILITY STUDY, INSTALLATION RESTORATION PROGRAM SITE 11 DISPOSAL PITS, NATIONAL AERONAUTICS AND SPACE ADMINISTRATION, CROWS LANDING FLIGHT FACILITY, STANISLAUS COUNTY, CALIFORNIA

We have reviewed the *Revised Draft Final Feasibility Study, Installation Restoration Program (IRP) Site 11 Disposal Pits (Site 11), NASA Crows Landing Flight Facility, Administration Area, Stanislaus County* (Revised Site 11 FS), dated 16 November 2001. The Revised Site 11 FS summarizes all investigations related to Site 11 soil and groundwater assessment and characterization; identifies site cleanup objectives; describes, screens, and provides a detailed analysis of the site remedial alternatives; and proposes remedial action approaches. While the Revised Site 11 FS does not recommend a remedial approach, it states that the Site 11-final remedy will be identified in a Proposed Plan, scheduled for release in June 2002.

General Comments:

1. We disagree with several of the Navy's interpretations of the State's Applicable or Relevant and Appropriate Requirements (ARARs), and To-Be-Considered Requirements (TBCs) in the Revised Site 11 FS. In a Board letter dated 17 September 2001, we provided our position to all parties by way of the State Water Resources Control Board, Office of Chief Counsel Memorandum, *Applicable or Relevant and Appropriate Requirements (ARARs), To-Be-Considered Requirements (TBCs), and Permit Requirements of CERCLA* (Memo). In addition, our letters dated 8 April 1998 and 20 March 2000 (General Comment 2 and Specific Comment 6) also addressed this issue. Please include an evaluation of all State-identified requirements, called "ARARs" and "TBCs" in the FS.
2. The Revised Site 11 FS does not address some of the 20 March 2000 Board staff comments to the prior revised FS (1 November 1999), including the determination of background levels for beryllium, where concentrations exceed human health standards (Specific Comment 9), and an updated groundwater monitoring plan (Specific Comment 2). Please review our 20 March 2000 comments on Site 11, and also provide a response to those prior comments.

3. The Revised Site 11 FS does not provide sufficient detail to evaluate the protectiveness criterion for Alternative 3: Consolidation and Capping with Clay Barrier. While the Clay Barrier (landfill cap) is described in the text and graphically in a figure (Figure 4-1), there is inadequate description of the consolidation process. Additional landfill details, such as the vertical location in relationship to the ground surface (surface placement, subsurface placement depth, height of finished containment unit) and the base of the landfill (lined, unlined), are missing. Please provide these details in the Revised Site 11 FS.

4. The Revised Site 11 FS does not include a signature page for the licensed professional (California Business Code) or a statement of qualifications for the responsible lead professional. Please include both in the Revised Site 11 FS.

Specific Comments:

1. b). Table 3-1 states (page 3-4) that State Action Levels are relevant only to public water systems, and are not enforceable (not promulgated). The Basin Plan, including the narrative Toxicity Objective, is promulgated. The Board uses Water Quality Goals, which include MCLs and State Action Levels, to interpret the Toxicity Objective. Please revise the text to include the Basin Plan Toxicity Objective as an ARAR.

Section 3.2 Applicable or Relevant and Appropriate Requirements, page 3-2, and Table 3-1, pages 3-3 to 3-10: The text refers only to CERCLA Section 121(d) for ARARs and TBCs, stating that "state environmental or facility siting requirements" must be promulgated, more stringent than federal requirements, identified in a timely manner, and are consistently applied. The state requirements presented previously to the Navy by Board staff meet all of the aforementioned criteria. In addition, we have commented on numerous occasions that CERCLA Sections 14 and 120(a)(4), not Section 121(d), govern the application of state requirements at NASA Crows Landing Flight Facility, a non-NPL listed site. While SWRCB Resolution No. 68-16 is listed as an ARAR (Relevant and Appropriate), the following promulgated Board document and SWRCB Resolutions were not included in Table 3-1: 1). The *Fourth Edition of the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins* (Basin Plan), which includes the narrative Toxicity Objective, SWRCB Resolution No. 88-63 (which defines the sources of drinking water), and SWRCB Resolution No. 92-49, (which establishes the Policies and Procedures for Investigation and Abatement of Discharges under the Water Code Section 13304). The Navy has prior knowledge of the Basin Plan and both SWRCB Resolutions, which we included in a list of ARARs for the Site 17 FS (Administration Area Plume). Please include the Basin Plan and SWRCB Resolutions in Table 3-1.

2. Section 3.2 Applicable or Relevant and Appropriate Requirements, page 3-2: The text also states that only substantive requirements are ARARs. Again, CERCLA Sections 14 and 120(a)(4), not Section 121(d), govern the application of state requirements.

3. Section 4.1.3 Alternative 3, Consolidation and Title 27 Prescriptive Cap, page 4-2, and Section 5.3 Summary, page 5-10: The text does not provide sufficient detail to evaluate this alternative. Specifically, the text does not provide (or even mention) a description of a landfill liner. It merely states that once the (contaminated) material is consolidated into an area larger than the previously identified disposal pit(s), a prescriptive cap will be constructed over the waste in accordance to the California Code of Regulations (CCR), Title 27. A cross-section Figure 4-1 shows only the landfill cap construction. Section 5.3 states that state acceptance is contingent upon demonstration (by the Navy) that the remedy

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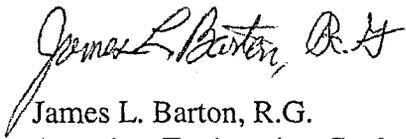
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is protective of groundwater quality. CCR Title 27 requires that all new landfills include, with the cap, a liner and leachate collection system. Please include a description of, and expand the cap construction figure to show a CCR Title 27 approved landfill liner and leachate collection system. Also note that any unexploded ordinance will need to be properly disposed offsite.

4. The black and white reproductions of the color photos are of very poor quality, making identification of listed features difficult. Please include better reproduction of the photos in future documents.

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



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