



October 6, 1995

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CROWS LANDING  
SSIC NO. 5090.3.A

Mr. Jim Simpson  
Stanislaus County Department of Environmental Resources  
Hazardous Materials Division  
1716 Morgan Road  
Modesto, California 95358

**Subject: Naval Auxiliary Landing Field Crows Landing  
Investigation Derived Waste Management**

Dear Mr. Simpson:

This letter describes the procedures to be followed during upcoming field activities at Naval Auxiliary Landing Field (NALF) Crows Landing, California.

Beginning in mid-October 1995 and continuing through December 1995, PRC Environmental Management, Inc. (PRC) will be conducting field activities at four underground storage tank (UST) sites and two Installation Restoration Program (IRP) sites at NALF Crows Landing, California. An estimated 280 55-gallon drums of soil (drill cuttings) from approximately 38 boreholes will probably be generated. In addition, 80 drums of soil generated during recent field activities are currently being stored on site at UST Clusters 1 and 2. This number of drums represents approximately 100 cubic yards of soil. Based on previous sampling analytical results, an estimated 30 to 40 cubic yards of soil will require on site treatment or off-site disposal.

USTs 109 and 117, and tanks at UST Clusters 1 and 2 were removed and the areas investigated to determine the extent of petroleum contamination remaining in soil after their removal. Total petroleum hydrocarbon (TPH) concentrations at these sites ranged from non-detect to 34,000 milligrams per kilogram (mg/kg). However, recent sample analytical results indicated that more than 70 percent of the samples collected contained TPH concentrations lower than 100 mg/kg.

The investigation at IRP Site 11 is being conducted to confirm detections of petroleum in groundwater and identify possible source areas. The maximum TPH detection found to date in Site 11 soil samples was 120 mg/kg.

The investigation at IRP Site 17 is directed at determining the source of carbon tetrachloride contamination in groundwater. To date, no source has been confirmed. Carbon tetrachloride has not been detected in any soil samples collected during previous investigations at Site 17. However, based on groundwater analytical results, a potential source area and maximum areal contaminant extent have been identified. One borehole will be located within the potential source area; the soil in that area may contain detectable levels of carbon tetrachloride. All other Site 17 boreholes will be located outside the potential source area, and samples from these boreholes are not expected to contain detectable levels of carbon tetrachloride.

At Site 11 and the UST sites, PRC will segregate all clean soil from obviously contaminated soil as boreholes are drilled and sampled. Segregation will be based on visual, and olfactory observations, and on photoionization detector (PID) readings greater than 100 parts per million (ppm). This method proved extremely reliable during recent sampling activities, where field observations

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correlated with laboratory analytical results at more than 95 percent accuracy. Clean soil will be spread around or near the borehole when drilling is completed at each location. Contaminated soil that has been segregated into 55-gallon drums will be moved to an existing bermed concrete pad for treatment.

At Site 17, soil derived from the borehole located within the potential carbon tetrachloride source area will be placed into 55-gallon drums, labeled, and stored next to their respective boreholes until analytical results from borehole samples are received from the laboratory. If laboratory analytical results indicate that soil from the potential source area borehole contains detections of carbon tetrachloride above the U.S. Environmental Protection Agency residential soil preliminary remediation goal (PRG) of 0.92 mg/kg, soil from that borehole will be taken to the treatment pad and spread in an area separate from TPH-contaminated soil. Soil from Site 17 boreholes located outside the potential carbon tetrachloride source area will be spread around the borehole as drilling proceeds.

Periodically, the soil in the treatment pile will be mechanically overturned to enhance volatilization and biodegradation of the soil contaminants. The TPH and carbon tetrachloride contaminated portions of the pile will each be segmented into several zones. A composite sample will then be collected from both portions of the treatment pile at several locations within each zone and submitted for laboratory analysis. PRC estimates that treatment pile sampling will occur in approximately February 1996. If analytical results indicate that extractable TPH is not detected or is detected at concentrations of 100 mg/kg or lower, and if carbon tetrachloride is not detected or detected below the PRG, the soil will be taken from the pile and spread on the ground in an open, unused field nearby. Otherwise, an off-site facility will be selected for disposal of the contaminated segment. The area selected for on site disposal of the treated soil is located more than 1/3 mile from the nearest surface water body (Little Salado Creek). All soil on the treatment pile will be covered during rain to prevent water runoff.

Please call me at (303) 312-8815 or Mr. Neil Bingert at (303) 312-8877 before October field work begins if you have any questions or concerns.

Sincerely,



Keith Reamer  
Project Manager

KR:cmg

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**Transmittal**

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