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From: Hornecker, Lynn M (EFDSW)
Sent: Thursday, May 09, 2002 1:04 PM
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'dchuck@mail.arc.nasa.gov'; Klimek, Ann (EFDSW); Plaseied, S Ronald
(EFDSW)
Subject: Navy Responses to RWQCB Comments, Fourth Quarterly Basewide
Groundwater Sampling and Analysis Report, NASA Crows Landing Flight
Facility

Hello Jim,

Transmitted as the attachment are the Navy responses to RWQCB comments dated 19 February 2002 on the fourth quarterly groundwater report for NASA Crows Landing Flight Facility.

Please do not hesitate to contact me if you have questions pertaining to the responses or to the groundwater monitoring program.

Thank you very much for providing comments.



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May2002.pdf

V/R
Lynn Marie Hornecker
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9 May 2002

RESPONSE TO COMMENTS FROM THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL VALLEY REGION

**Subject: Quarterly Basewide Groundwater Report, Verification Sampling and Analysis – Summer 2001, Fourth Quarter,
NASA Crows Landing Flight Facility, Crows Landing, California (IT Corporation, December 2001)**

Date: 9 May 2002

| Comment | Response |
|---|---|
| <p>Comments prepared by James L. Barton, R. G., Associate Engineering Geologist, California Regional Water Quality Control Board, Central Valley Region, Sacramento, California, dated 19 February 2002.</p> <p>Subject: <u>Quarterly Basewide Groundwater Report, Verification Sampling and Analysis – Summer 2001, Fourth Quarter, NASA Crows Landing Flight Facility, Crows Landing California.</u></p> <p>Addressee: Marianna Potacka, BRAC Environmental Coordinator</p> | |
| Specific Comments | |
| <p>1. Section 2.2.4 Supplemental Information, Field Observations, Page 2-3: The text states that monitoring well 17-MW-15 appears to be impacted by bentonite grout, due to high pH (11.14 to 11.18) and visual evidence. Section 4.0 Monitoring Plan Recommendations does not provide a recommendation to rehabilitate or replace 117-MW-15. Please provide a recommendation for rehabilitation or replacement of 17-MW-15.</p> | <p>Initial indications from field notes taken during well purging, prior to sampling 17-MW-15, indicated that there is a potential problem with the condition of the well. Water purged from the well had a high pH and contained white particulate material. Initial assumptions were that the well was not correctly constructed or was damaged and grout material was entering the well casing. Recent information from deep borings and deep well installation at the Administration Area Plume indicate that the well is likely screened well into the Corcoran Clay. The deep borings indicate that the Corcoran Clay starts at approximately 220 feet below ground surface (ft bgs). 17-MW-15 is screened from 260 to 270 ft bgs. It is likely that problems with water quality in 17-MW-15 are due to the Corcoran Clay. A new deep well will be installed approximately 20 feet northwest of 17-MW-15 with similar construction (screen length and well material) and will be screened above the known depth of the Corcoran Clay (approximately 210 to 220 ft bgs). The well will be installed using sonic drilling technique and a continuous core will be collected and logged. Well installation is tentatively scheduled for May/June 2002. 17-MW-15 will be closed pending development of a suitable technique, permitting, and contracting.</p> |

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| <p>2. Section 3.1.2 Basewide Water Level Monitoring Results, Page 3-1: The text states that the datalogger hydrographs presented in Appendix C show that monitoring well BG-MW-01 is influenced by pumping at irrigation well 6/8-20(NALF) at a distance of 900 feet. Another Appendix C datalogger hydrograph also shows an apparent influence from pumping wells, as smaller peaks at monitoring well CL2-MP-03B. CL2-MP-03B is located approximately 800 to 1200 feet from three different irrigation wells (6S/8E-9-M1, 6S/8E-9M2, and one well listed as “new” in the Figure of Estimated Locations of Water Supply Wells, from <i>Draft Findings from Record Search Activities and Visual Inspections of Active and Inactive or Destroyed Water Supply Wells, Former NALF Crows Landing</i>, dated 31 December 2001. Please evaluate whether the peaks shown on the CL2-MP-03B datalogger hydrograph are the result of pumping irrigation wells, and identify which irrigation well(s) may have influenced the water levels at CL2-MP-03B. Provide a detailed description, including distance to the pumping well, of this analysis in the next groundwater monitoring report. This data is helpful for determining the radius of influence of pumping irrigation wells, and will be useful when designing a remedial alternative that includes hydraulic containment of the groundwater plume.</p> | <p>The hydrograph for well CL2-MP-03B shows several instantaneous changes in water level during a period from approximately June 26 through July 17, 2001. These instantaneous changes in water level appear distinctly different from the relatively gradual changes in water level seen in BG-MW-01 (over a period of several days) that are assumed to be a result of affects from agricultural well pumping. The instantaneous changes in hydrograph from CL2-MP-03B are likely due to ongoing field activities that may have disturbed the water level or probe within that well. The large change that occurred on July 2, 2001 was due to adjusting the datalogger depth in the well and corresponds to the date and time of the monthly datalogger inspection and data download. In general the hydrograph from CL2-MP-03B shows the same gradual decrease in water level seen in most of the other wells where dataloggers are installed. Based on the hydrograph from May 9 through August 15, it does not appear that pumping from any specific water supply well influences the water level at CL2-MP-03B. Without knowing the specific pumping time and rate from the water supply well and without a distinct measurable change in the water level at CL2-MP-03B, the radius of influence of the irrigation well cannot be determined. Current data indicates that the groundwater plume at UST Cluster 2 appears to be stable or decreasing in size. The alternatives being evaluated for corrective action and closure of UST Cluster 2 will not likely require active containment of the plume.</p> |
| <p>3. Section 3.3.4 Method Blanks and Trip Blanks, page 3-5: The text states that three (3) Method Blanks and associated groundwater samples contained gasoline components. Method blanks were also contaminated with VOCs and metals. Consequently, all groundwater samples with less than 5 times the concentration detected in the Method Blank were reported as non-detect. Please evaluate sampling and analysis protocols to eliminate contamination.</p> | <p>Method Blanks are internal laboratory samples used to determine if contamination is introduced in the laboratory as part of sample preparation and handling. Because of the nature of the laboratory, trace compounds are commonly found in Method Blank samples. Total petroleum hydrocarbons in the gasoline range (TPH-g) include all compounds detected in the range from C₆ to C₁₂. A detection of any compound in this range results in a reportable detection of TPH-g. To be conservative in minimizing false positive detections, the detection limit is modified for specific compounds if laboratory contamination is detected in the method blank. The modified detection limits are within acceptable ranges to determine how the concentrations of compounds of concern relate to potential cleanup goals. The evaluation of the quality of the data included in Section 3.3 indicates that all data is within acceptable limits for the laboratory methods.</p> |

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| Specific Comments | Response |
|---|--|
| 4. The Appendix B laboratory data sheets show that trip blanks from sample delivery groups (SDG) 01-5241, and SDG 01-5285 contained gasoline (20 ug/L estimated). Please revise the text in Section 3.3.4 Method Blanks and Trip Blanks, TPH as gasoline (EPA Method 8015B), page 3-5, to include the contaminated trip blanks. | It is noted that TPH-g was detected in the trip blank. The reported detection of THP-g in the trip blank may have been result of laboratory contamination that is confirmed by the detection of TPH-g in the method blank. The detection of TPH-g in the trip blanks does not affect the results for other samples in the specific SDGs. |
| 5. Section 4.0 Monitoring Plan and Recommendations, page 4-1: The text states that 4 wells were added to the monitoring program, while 4 wells were removed. A table in the text gives the well numbers and the rationale for removing 1 of the 4 wells. a). Please revise the table to give the rationale for removing the other 3 wells from the monitoring program. b). In the future, please provide the rationale(s) for changing the monitoring plan wells to the BRAC Cleanup Team (BCT) for regulatory agency concurrence, prior to modifying the monitoring program. | As stated in the text, the changes to the monitoring program were made to incorporate newly installed wells. Well 17-MW-25(S) replaces 117-MW-04(S) as the shallow well furthest downgradient of UST 117 and Site 17. Well 17-MW-25(MS) replaces 117-MW-07(MS) as the mid-shallow well furthest downgradient of UST 117 and Site 17. Well 17-MW-24(MS) replaces 17-MW-11(MS) as the mid-shallow well furthest downgradient of Site 17. Changes in the monitoring program are documented in the quarterly report, which is distributed to the BCT members. Every attempt is made to publish the reports prior to the following quarterly sampling event. When publishing the report is delayed, the BCT members will continue to be provided information pertaining to changes in the monitoring program in a separate transmittal. |

Transmittal

Date: 10 May 2002

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Administrative Record Manager

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