

Hornecker, Lynn M (EFDSW)

From: Hornecker, Lynn M (EFDSW)
Sent: Friday, December 20, 2002 1:27 PM
To: 'laudonl@rb5s.swrcb.ca.gov'
Cc: Potacka, Marianna K (EFDSW); Klimek, Ann (EFDSW);
'fdonofri@dtsc.ca.gov'; 'msonke@envres.org'; 'donald.m.chuck@nasa.gov';
'aberry@ciwmb.ca.gov'
Subject: Navy Responses to RWQCB Comments dated 21 November 2002, NASA
Crows Landing Flight Facility

Reference: RWQCB, Central Valley Region, Sacramento Main Office letter dated 21 November 2002
(Subject: Information Package, Verification of Conditions along Bell Road and Action Memorandum,
Time-Critical Removal Actions at the Original Sewer System, IRP Site 11A)

Hello Leslie,

Our responses to the RWQCB comments dated 21 November 2002 are attached.

Please do not hesitate to contact me (619 532-0783) or Marianna Potacka (619 532-0941) if you have
questions pertaining to our responses.

Thank you.

V/R
Lynn Marie Hornecker
SOUTHWESTNAVFACENGCOM
BRAC PROGRAMS OFFICE
(619) 532-0783/Fax (619) 532-0780
20 December 2002



c:\NavyRTC21Nov200
2RWQCBcmntsBel...

RESPONSES TO COMMENTS FROM THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL VALLEY REGION, SACRAMENTO OFFICE

Subject: Information Package, Verification of Groundwater Conditions along Bell Road; and Action Memorandum, Time-Critical Removal Actions at the Original Sewer System, Installation Restoration Program (IRP) Site 11A, National Aeronautics and Space Administration (NASA) Crows Landing Flight Facility, Stanislaus County

DATE: 20 December 2002
 PAGE 1

Comment	Response
<p>Comments prepared by James Barton, California Regional Water Quality Control Board, Central Valley Region dated 21 November 2002</p> <p>Subject: <i>Information Package, Verification of Groundwater Conditions along Bell Road; and Action Memorandum, Time-Critical Removal Actions at the Original Sewer System, Installation Restoration Program (IRP) Site 11A, National Aeronautics and Space Administration (NASA) Crows Landing Flight Facility, Stanislaus County</i></p> <p>Addressee: Marianna Potacka, BRAC Environmental Coordinator, BRAC Operations, SWESTNAVFACENGCOM</p>	
<p>We have reviewed the <i>Information Package, Verification of Groundwater Conditions along Bell Road (Report) and Action Memorandum, Time-Critical Removal Actions (TCRA) at the Original Sewer System, IRP Site 11A, NASA Crows Landing Flight Facility, Stanislaus County (TCRA Memo)</i>, both dated 28 October 2002.</p> <p>The report provides a graphical evaluation of the Administration Area Groundwater Plume Time-Critical Removal Action and Interim Removal Action at former IRP Site 117, using</p>	<p>The Navy appreciates the participation of the Regional Water Quality Control Board (RWQCB), Central Valley Region in the review of the environmental restoration program documents.</p> <p>For clarification, the oxidation pond area at Site 11A includes areas of known lead and cadmium contamination as well as areas of construction debris. The Action Memorandum presents an estimated quantity of 6,200 tons of buried waste and construction debris. Based upon our evaluation of the information collected during exploratory trenching activities,</p>

RESPONSES TO COMMENTS FROM THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL VALLEY
 REGION, SACRAMENTO OFFICE

Subject: Information Package, Verification of Groundwater Conditions along Bell Road; and Action Memorandum, Time-Critical
 Removal Actions at the Original Sewer System, Installation Restoration Program (IRP) Site 11A, National Aeronautics and Space
 Administration (NASA) Crows Landing Flight Facility, Stanislaus County

DATE: 20 December 2002
 PAGE 2

Comment	Response
<p>groundwater analytical results from 1997 through 2002. The Report also recommends installing four additional piezometers and one extraction well. The Report states that the groundwater extraction for the ongoing Interim Removal Action will shift to the new location between the source area and the property boundary along Bell Road. The Report states that the piezometer/well installation will occur in late November 2002 using the existing Work Plans, Revision 2. Extracted groundwater will continue to be shipped offsite for disposal.</p> <p>The TCRA Memo proposes a soil removal action at Site 11A, the former sewage system. High levels of lead (2,230 mg/kg) and cadmium (15.2 mg/kg) were detected in soils during an investigation conducted in May 2002. The TCRA Memo states that residual lead concentrations will be evaluated using the U.S. Environmental Protection Agency (USEPA), Region IX Preliminary Remediation Goals (PRGs) of 750 mg/kg (lead-contaminated industrial soil). The Navy estimates that 6,200 tons of lead and cadmium contaminated soil will be removed to a depth of approximately 10 feet, and shipped offsite for disposal in a hazardous waste landfill.</p>	<p>construction debris comprises the majority of the buried waste in the oxidation pond area.</p>

RESPONSES TO COMMENTS FROM THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL VALLEY
 REGION, SACRAMENTO OFFICE

Subject: Information Package, Verification of Groundwater Conditions along Bell Road; and Action Memorandum, Time-Critical Removal Actions at the Original Sewer System, Installation Restoration Program (IRP) Site 11A, National Aeronautics and Space Administration (NASA) Crows Landing Flight Facility, Stanislaus County

DATE: 20 December 2002
 PAGE 3

Comment	Response
<p>General TCRA Memo Comment</p> <p>1. The TCRA Memo was released as final and publicly noticed in the local newspaper on 31 October, one day after we received the document at our office. We are concerned that the Navy, while stating in the TCRA Memo that the regulatory agencies will continue to provide input into the process, did not allow adequate review time for the TCRA Memo. This is contrary to our agreement in meetings this summer that the Navy would provide an adequate period for our review of future draft TCRA proposals. We request that, in the future, the Navy provide a minimum of one month for our reviews, prior to releasing the TCRAs for public comment.</p>	<p>We described the time-critical removal actions to remove buried waste at the oxidation pond area of the original (former) sewage treatment plant in the Action Memorandum dated October 2002.</p> <p>We issued an interim data summary to the BCT members on 12 July 2002 to describe the proposed exploratory trenching locations at the oxidation pond area. The trenching activities were intended to better delineate the areas with buried waste. No comments pertaining to proposed trenching locations were received from the BCT members.</p> <p>Trenching activities at the oxidation pond area were completed in August 2002.</p> <p>We issued an interim data summary to the BCT members on 27 September 2002 to describe the results of the exploratory trenching activities. No comments pertaining to the presentation of the results of the trenching activities were received from the BCT members.</p> <p>The 27 September 2002 transmittal identifies the Navy's plan to excavate the buried waste at the oxidation pond area, and this transmittal is included in Attachment 2 of the Action</p>

RESPONSES TO COMMENTS FROM THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL VALLEY
 REGION, SACRAMENTO OFFICE

Subject: Information Package, Verification of Groundwater Conditions along Bell Road; and Action Memorandum, Time-Critical Removal Actions at the Original Sewer System, Installation Restoration Program (IRP) Site 11A, National Aeronautics and Space Administration (NASA) Crows Landing Flight Facility, Stanislaus County

DATE: 20 December 2002
 PAGE 4

Comment	Response
	<p>Memorandum dated October 2002.</p> <p>If you have specific comments or concerns pertaining to the results of the trenching activities, the characteristics of the buried waste, or the removal actions, please provide us with an opportunity to provide clarification or additional information, as appropriate.</p> <p>The Navy will consider and respond to comments from the BCT and other team members as expeditiously as possible.</p>
<p>We concur with the proposed actions in the Report and TCRA Memo. Please provide 72 hours notice prior to commencement of fieldwork.</p>	<p>We appreciate the participation of the RWQCB in the review of the Action Memorandum and the Information Package, Verification of Groundwater Conditions along Bell Road.</p> <p>We provided notification of planned start of drilling activities for the piezometers and extraction well along Bell Road in our e-mail message dated 4 December 2002.</p> <p>Additionally, we provided notification pertaining to the tentative schedule for intrusive field activities at the oxidation pond area in our e-mail message of 4 December 2002. Weather conditions may cause delays in beginning and/or implementing the intrusive field work. We will continue to keep the RWQCB and the other</p>

RESPONSES TO COMMENTS FROM THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL VALLEY
REGION, SACRAMENTO OFFICE

Subject: Information Package, Verification of Groundwater Conditions along Bell Road; and Action Memorandum, Time-Critical Removal Actions at the Original Sewer System, Installation Restoration Program (IRP) Site 11A, National Aeronautics and Space Administration (NASA) Crows Landing Flight Facility, Stanislaus County

DATE: 20 December 2002
PAGE 5

Comment	Response
	<p>team members informed of the planned schedule for intrusive field activities.</p> <p>We invite the RWQCB and the other team members to visit the site during the implementation of the field activities at the oxidation pond area and during the verification of conditions along Bell Road.</p>

Transmittal

Date: 20 Dec 2002

From: Lynn Marie Hornecker *LMH*
Code 06CC.LMH

To: Diane Silva
Code ~~01LS.DS~~ 05G.DS
Administrative Record Manager

Subj: CERCLA ADMINISTRATIVE RECORD MATERIALS
NALF Crows Landing

Installation: NALF Crows Landing

UIC Number: N60211

Document Title:

Responses to RWQCB comments

Author:

Lynn Marie Hornecker

Recipient:

Ceshe Landry RWQCB

Record Date:

20 Dec 2002

Approximate Number of Pages:

6

Sites:

Sites 11A + 17

Key Words:

responses to comts

Contract:

N/A

CTO Number:

N/A