



California Regional Water Quality Control Board

Central Valley Region

Robert Schneider, Chair



Winston H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

4 August 2003

Ms. Lynn Hornecker
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BRAC Operations Office
1220 Pacific Highway
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REVIEW OF FINAL PROJECT PLANS, TIME-CRITICAL REMOVAL ACTION AT INSTALLATION RESTORATION PROGRAM SITE 11A, NASA CROWS LANDING FLIGHT FACILITY, STANISLAUS COUNTY

We have reviewed your report entitled *Final Project Plans, Time-Critical Removal Action at Installation Restoration Program Site 11A, NASA Crows Landing Flight Facility*, dated 5 May 2003, prepared and submitted by Shaw Environmental, Inc., on your behalf. Our comments are contained in the attached staff memorandum.

The issue of cleanup level in residual soil for lead is not discussed in the report. However, we defer the issue to the Department of Toxic Substances Control for appropriate resolution.

If you have any questions, please call Dale Essary at (559) 445-5093.

DANE S. JOHNSON
Senior Engineering Geologist
CRG No. 4239

cc: Ms. Francesca D' Onofrio, California Department of Toxic Substances Control, Sacramento
Mr. Don Chuck, NASA Ames Research Center, Moffett Field
Mr. Mike Sonke, Stanislaus County Department of Environmental Resources, Hazardous Materials
Division, Modesto
Mr. Richard Jantz, Stanislaus County Chief Executive Office, Modesto

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California Environmental Protection Agency





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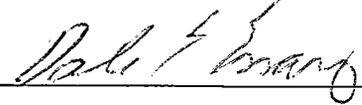
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TO: DANE S. JOHNSON
Senior Engineering Geologist

FROM: DALE E. ESSARY
Water Resource Control Engineer
RCE No. 53216

DATE: 4 August 2003

SIGNATURE: 

**SUBJECT: FINAL PROJECT PLANS, TIME-CRITICAL REMOVAL ACTION AT
INSTALLATION RESTORATION PROGRAM SITE 11A, NASA CROWS
LANDING FLIGHT FACILITY, STANISLAUS COUNTY**

We received a report entitled *Final Project Plans, Time-Critical Removal Action at Installation Restoration Program Site 11A, NASA Crows Landing Flight Facility, Revision 1 (TCRA)*, dated 5 May 2003, prepared and submitted by Shaw Environmental, Inc., on behalf of the U.S. Navy. The TCRA provides a proposal for the field implementation of the time-critical removal action described in the report entitled *Action Memorandum for Time-Critical Removal Actions at the Oxidation Pond Area at the Original Sewer System, Installation Restoration Program Site 11A [2002]*. The TCRA also revises a previous edition to include the demolition of NASA Research Facility structures that overlie portions of two of the former oxidation ponds at IRP Site 11A and exploratory trenching to determine if waste was buried below those structures. Comments below pertain to my review of the TCRA.

Information Provided

The former sewer system consists of a sewage treatment plant, several thousand feet of sewer trunk lines, several lateral lines, sewage impoundments and septic tanks, a processing tank, and settling ponds near the northeastern end of the facility property near Bell Road. The former sewage treatment plant was constructed in approximately 1943 and was abandoned in the early 1950s. Geophysical surveys and exploratory trenching conducted in 2000 and 2001 revealed areas of buried waste and debris in former oxidation ponds. A passive soil gas survey performed during Summer 2001 revealed no significant soil gas releases along the sewer pipelines or at the sewage impoundment areas.

Further exploratory trenching was conducted in August 2002 at selected geophysical anomalies near the former oxidation ponds. The boundaries of buried wastes were refined based upon the trenching activities. Waste materials discovered include concrete, asphalt, wood, metal, and ash material. Samples of the ash material contained greater than 2,000 milligrams per kilogram (mg/kg) of lead.

An Action Memorandum was issued in October 2002 for time-critical removal actions for the removal and off-site disposal of buried waste at selected locations at the former oxidation pond area. A public notice announcing the availability of the administrative record for the removal actions was published in

late October 2002, with detailed plans for the removal actions issued in November 2002. Security fencing around the planned excavation areas was constructed in December 2002.

The primary objective of the removal action is to remove the waste materials and the structures, including the abandoned septic tanks. A number of tasks are proposed to be implemented to accomplish this objective, including: removal and off-site disposal of the abandoned septic tank system; removal and off-site disposal of debris and waste materials; soil-gas sampling for methane gas analysis around the perimeter of the NASA Research Facility; demolition and removal of the NASA Research Facility; exploratory trenching beneath the NASA Research Facility footprint; and characterization of any waste materials encountered in the exploratory trenches for off-site disposal.

Details pertaining to implementation of the removal action, waste management procedures, and project submittals are provided in the Plan. Also included in the appendices of the Plan are a Sampling and Analysis Plan, a Quality Control Plan, a Site Health and Safety Plan, and an Environmental Protection Plan.

Comments

In a letter submitted by the Department of Toxic Substances Control (DTSC), a copy of which was received by the Sacramento Regional Board office on 30 December 2002, the DTSC expressed their concerns regarding the cleanup level for lead in soils of 750 mg/kg, based on the U.S.E.P.A. Preliminary Remediation Goal (PRG), proposed in the TCRA. The DTSC letter indicates that the Navy should consider cleaning up residual lead to a level appropriate for unrestricted use of the property. In a follow-up e-mail from U.S. Navy to DTSC dated 10 February 2003, the DTSC is cited to have indicated that the State of California PRG of 130 mg/kg for lead would be the appropriate cleanup level to allow unrestricted use of the property, and that residual lead concentrations above 130 mg/kg would require land use restrictions to be implemented at the facility. The U.S. Navy indicated their intention to take this lower cleanup level under consideration in the 10 February 2003 e-mail.

The issue of cleanup level in residual soil for lead is not discussed in the TCRA. However, I recommend we defer the issue to the DTSC for appropriate resolution.

Transmittal

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Code 06CC.LMH

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

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