

**Response to Comments on the Draft Investigation Summary Report, Extent of Groundwater Impact Verification, Installation Restoration Program Site 17, NASA Crows Landing Flight Facility, Crows Landing, California
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Comments by: Francesca D'Onofrio, Hazardous Substance Scientist, Department of Toxic Substances Control, Office of Military Services, dated April 5, 2006			
Comment No.	Section, Figure, Table	Comment	Response
		<p>Department of Toxic Substances Control (DTSC) has reviewed the above referenced document which discusses the findings of the Administration Area Plume (Site 17) investigation conducted off site and down gradient from the facility.</p> <p>As referenced in Section 3.2.6 of the report, the summary of analytical results indicated the following:</p> <ul style="list-style-type: none"> • Benzene and 1,2-dichloroethane were only detected in the mid-shallow interval and have been defined in all four intervals. • The extent of carbon tetrachloride has been defined in the shallow interval but not in the mid-shallow, mid-deep and deep intervals. • The extent of chloroform has been defined in the shallow, mid-deep and deep intervals but not in the mid-shallow interval. <p>Based on the detection limits of the above contaminants, DTSC concurs with the recommendations summarized below as set forth in the document:</p> <ul style="list-style-type: none"> • Further defining of the extent of carbon tetrachloride and chloroform in the mid-shallow, mid-deep, and deep intervals through additional downgradient groundwater sampling and analysis. • An assessment will be conducted to evaluate if the impacted groundwater detected off-site poses a risk to human health and the environment and to determine if migration control is necessary. • An evaluation of potential remedial technologies to be included in the feasibility study. 	<p>Concurrence noted.</p>

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		<p>DTSC agrees with the recommendations outlined above which have been discussed to further identify and delineate the extent of groundwater contamination on property off site and downgradient from the facility. However, the analytical results also indicated the presence of trichloroethene in the shallow and mid-shallow intervals. However, this finding is not discussed in the conclusions and recommendations. Please address accordingly.</p>	<p>The data collected to date does not indicate a defined plume of trichloroethene with a specific on-site source area (highly concentrated area where concentrations decrease with distance downgradient). The northern and southern extent of the trichloroethene detections on-site are defined by existing wells/piezometers and previous discrete samples along Bell Road. The downgradient and southeastern extent of detections are not defined off-site.</p> <p>Additional investigation is required to define the extent of the chloroform plume in the mid-shallow interval to the south of the off-site investigation area. This is the same area where trichloroethene was detected. Samples will be collected from the shallow and mid-shallow intervals in this area and analyzed for volatile organic compounds. Data from the additional off-site investigation will be used to further evaluate the trichloroethene to determine the potential source and extent of detections.</p> <p>Text will be added to the conclusions and recommendations section of the report to indicate that data from the additional investigation will also be used to evaluate the potential source and extent of the trichloroethene detections.</p>

