5090
Ser 1811KN/0029
16 FEB 1989

Mr. Paul A. Marshall
Area Engineer
California Regional Water Quality
Control Board
Central Valley Region
3443 Routier Road
Sacramento, CA 95827-3098

Subj: RESPONSE TO COMMENTS ON THE SITE INVESTIGATION REPORT, NAVAL AUXILIARY LANDING FIELD, CROWS LANDING

Dear Mr. Marshall:

In response to your letter of December 20, 1988, which provided your comments on the Site Investigation Report of Naval Auxiliary Landing Field (NALF), Crows Landing, California, the following is provided:

1) The project was supervised by Mr. Daniel J. Hinrichs of ERM-West in Rancho Cordova, CA. He is a registered professional engineer with the State of California. Enclosure (1) is a revised report title page with Mr. Hinrichs' professional title and signature.

2) The Leaking Underground Fuel Tank (LUFT) Field Manual guidelines for total petroleum hydrocarbons and aromatic volatile organics were used to evaluate the analytical results within the context of the hydrogeologic conditions and leaching potential of the Crows Landing Fire Fighting School Site. The LUFT guidelines are a convenient framework for providing an initial assessment of the potential impact of petroleum hydrocarbons in soil above shallow groundwater at the site. However, we acknowledge that the conditions at each site must be evaluated on a case-by-case basis. With the possible exception of benzene, these guidelines appear well suited as target concentrations for site cleanup activities. As we proceed into the cleanup, we will work closely with your agency to determine the exact cleanup levels which need to be attained.

3) Groundwater from well W1 was analyzed for purgeable organic compounds by EPA Method 624, which yields a more definitive identification and higher detection limits than EPA Methods 601 and 602. This analysis produced detection limits above the State Primary Maximum Contaminant Levels (MCLs) or Department of Health Services Toxicity Levels for benzene, vinyl chloride, 1,4-dichlorobenzene, 1,2-dichloroethane and tetrachloroethene. Due to these high detection limits, well W1 will be resampled and analyzed by EPA Method 601 and 602.

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4) In accordance with industry standards, a duplicate water sample was collected from well W1. The sample was sent to the analytical laboratory "blind" and labeled as "well W2". The analytical report for sampling W2 represents data from well W1; there is no well W2 at the site. An explanation of the sample identification procedures was omitted from the report.

5) Methylene chloride, a common laboratory solvent, was detected in both the water samples and the travel blank. There are no records of this chemical ever being used at NALF Crows Landing, nor is the Fire Fighting Site a likely source for it. In addition, methylene chloride is highly volatile and unlikely to persist during fire fighting training. The methylene chloride detected in the water samples and travel blank most likely represents a laboratory contaminant.

Should you have any questions regarding this matter, the point of contact is Commander, Western Division, Naval Facilities Engineering Command (Attn: Ms. Kathy Nakazawa, Code 1811KN, (415) 877-7505).

Sincerely,

Louise T. Lew
Head, NPL Section

Encl:
(1) Revised report title page with signature

Copy to: (w/o encl)
U.S. Environmental Protection Agency (Attn: Jerry Clifford)
Department of Health Services, Alternative Technologies Section (Attn: Arvind Shah)
Department of Health Services, Toxic Substances Control Division (Attn: Gordon Stephens)
Stanislaus County Department of Environmental Resources, Hazardous Materials Division (Attn: Jim Simpson)

Blind copy to: (w/o encl) 09C5, 1811, 1811KN, 181
ERM-West (Attn: Benjamin Leslie-Bole), NAS Moffett Field (Code 189A)

WRITER: K. Nakazawa/1811KN/7502
TYPIST: B. Palmer/10 Feb 89/Ser 4059h
FILE: CROWS LANDING/

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CROWS LANDING
SSIC NO. 5090.3

ENCLOSURE

REVISED REPORT TITLE PAGE WITH SIGNATURE

THIS ENCLOSURE WAS NOT RECEIVED IN THE RESTORATION RECORD FILE.

FOR ADDITIONAL INFORMATION, CONTACT:

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NAVAL FACILITIES ENGINEERING COMMAND, SOUTHWEST
1220 PACIFIC HIGHWAY (NBSD BLDG. 3519)
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