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File: clstanislausltr3.doc

TRANSMITTAL

Date: 10 November 2000

From: Lynn Marie Hornecker

**To: Brad Hicks
Stanislaus County
Hazardous Materials Division
Department of Environmental Resources
3800 Cornucopia Way, Suite C
Modesto, CA 95358-9492**

Subj: Responses to Stanislaus County Comments
Draft Work Plan, Revision No. 1 (IT Corporation, Revised October 2000)
National Aeronautics and Space Administration (NASA)
Crows Landing Flight Facility

Transmitted are the responses to your comments that were received via e-mail message dated 27 October 2000.

We appreciate the prompt review of the plan and the submittal of the review comments.

Please do not hesitate to call me at (619) 532-0783 if you have questions pertaining to the planned fieldwork.

Thank you very much.

Attachment:

Responses to Comments from Stanislaus County (SWDIV, November 2000)

CF:

Marianna Potacka
BRAC Environmental Coordinator
Southwest Division, Naval Facilities Engineering Command

James Barton
California Regional Water Quality Control Board
Central Valley Region, Sacramento Office

Francesca D'Onofrio
California Department of Toxic Substances Control

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Brian Staab
Environmental Services
National Aeronautics and Space Administration

Project File (Crows Landing)

RESPONSES TO COMMENTS FROM STANISLAUS COUNTY DATED 27 OCTOBER 2000
Subject: NASA CROWS LANDING FLIGHT FACILITY

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Comment	Response
<p>Comments submitted via e-mail message dated 27 October 2000 from Brad Hicks, Stanislaus County to Marianna Potacka, BRAC Environmental Coordinator</p> <p>Subject: <i>Soil Vapor Extraction Optimization for Remediation of UST Cluster 1 and Site Verification Activities at Various Sites Work Plans, Revision 1, NASA Crows Landing Flight Facility (Rev 1) dated October 2000</i> [plans were transmitted 9 October 2000]</p>	
<p>1. Well abandonment's: The two monitoring wells are fine no comment.</p> <p>The County considers the two production wells to be real property assets. As such, does not desire to have them grouted at this point. Per our discussion, the wells are to be video surveyed and evaluated prior to proceeding with potential abandonment. The Department would like a copy of the video log of the wells for our evaluation prior to authorizing abandonment if needed.</p>	<p>1. The Navy will proceed to complete the closure of the monitoring wells and to prepare for videographic surveying of the water supply wells. The Navy will provide a copy of the videographic survey results to Stanislaus County. The Navy will pause to evaluate the results of the surveys and to discuss management of real property assets with the involved parties prior to implementing well destruction activities.</p>
<p>2. Site 11. The Department takes the intent of the proposed work to be a UXO clearance versus further site delineation as no sampling is to occur under the proposed effort. A geophysical survey was accomplished at this site in 1991 (PRC 92). It included both magnetometer and ground penetrating radar (Sect. 4.3.1, page 4-6 Final RI. Burial pit delineation maps and cross-sections are in the final RI. The Department believes the site is characterized enough to make a remedial decision and that further SI or RI type work is not warranted. Please proceed with finalizing the FS for this site.</p>	<p>2. The proposed work includes both UXO clearance to allow for implementation of future intrusive activities and geophysical surveying to verify the sizes and locations of the waste disposal pits. The Navy will utilize the survey data to refine the estimated boundaries of the disposal pit(s) and to revise the remedial alternatives and associated cost estimates that are presented in the Feasibility Study, as appropriate.</p>
<p>3. Cluster 1. The Department has no strong objection to the proposed effort yet cautions that it is questionable that the results will be contrary to the existing draft final FS.</p>	<p>3. The Navy will proceed with plans for the aquifer testing and groundwater extraction activities. The data will be used to refine the assumptions, as appropriate, for the proposed remedial alternatives. The identification of solvents in the groundwater at UST Cluster 1 during the July 2000 sampling event has resulted in a change to previous conceptual models for the UST Cluster 1 and IRP Site 17 groundwater plumes, and consequently, the Feasibility Study will be revised.</p>

RESPONSES TO COMMENTS FROM STANISLAUS COUNTY DATED 27 OCTOBER 2000
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Comment	Response
4. Sewer Survey. The Department understands that the proposed work is in response to RWQCB comments however, that fact does not alleviate the need for Data Quality Objectives (DQO's). What are the DQO's for the proposed work. The DQO's for each site effort should be explained in the work plan.	4. The videographic surveys of sewer pipelines are being planned in response to comments received from the Regional Water Quality Control Board, Central Valley Region. The Navy will develop data quality objectives for future verification and remediation activities at the sewer system.
5. CL 2. CL 2 has endured several months of active SVE operations already. The Department does not understand why existing data cannot be used to evaluate it's effectiveness. Is this a manifestation of change in contractors ?	5. The Navy will evaluate previously collected data and new data in order to determine the most efficient method(s) to close UST Cluster 2.
6. UST 109. The proposed work appears to be verification sampling and analysis to support closure. If so, please proceed.	6. Soil sampling will be conducted initially to verify current conditions to evaluate the effectiveness of the on-going passive bioventing system. The data will be evaluated to determine if site closure can be achieved without additional testing or remediation activities.
7. The Department concurs with the RWQCB comment that quarterly groundwater monitoring be implemented as in the past versus the proposed semi annual.	7. Comment acknowledged. Quarterly sampling will be implemented.
	Thank you very much for reviewing the document and for providing comments.

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File: cladminrectltr.doc

TRANSMITTAL

Date: 10 November 2000

From: Lynn Marie Hornecker

To: Diane Silva
Code 01LS.DS

Subj: CERCLA Administrative Record Materials
NALF Crows Landing

Installation: Naval Auxiliary Landing Field, Crows Landing

UIC Number: N60211

Document Title (or subject): Transmittal, Subject: Responses to Stanislaus County Comments

Author: Lynn Marie Hornecker, SWDIV

Recipient: Brad Hicks, Stanislaus County

Record Date: 10 November 2000

Approximate Number of Pages: 3

EPA Category: 01.1

Sites: UST Cluster 1, Site 11, Site 17

Key Words: Groundwater, FS, remediation

Contract: N/A

CTO Number: N/A