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Reply to Attn of: QE:218-1

FEB 21 2001

Commander
Southwest Division
Naval Facilities Engineering Command
BRAC Operations Office
Attn: Mariana Potacka, BRAC Environmental Coordinator
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8517

Dear Ms. Potacka:

NASA has received the Navy's responses to our comments on the *"Final Action Memorandum, Time-critical Removal Action, NASA Crows Landing Flight Facility"* dated November, 2000. The responses were dated 12 January 2001 and forwarded by e-mail on 27 January 2001.

The proposed time-critical removal action (TCRA) will involve the extraction of groundwater from one or more locations within the administration area plume near well CL1-MW-12(S). The removal action will end when either 50,000 gallons of water have been removed or the levels of ethylene dibromide (EDB) have reached 1000 µg/L, whichever comes first. The goals of the TCRA are to reduce contaminant mass along with potential exposure to off-site receptors and the potential of off-site migration.

NASA had two main concerns about the proposed TCRA: how will the proposed action reduce exposure of nearby receptors to chemicals in the groundwater and how will the TCRA reduce the potential of off-site migration of the contamination? Upon review of the Navy's responses, NASA feels that our concerns were not adequately addressed.

NASA believes the TCRA will do little toward reducing the contaminant mass present and therefore reduce exposure to nearby receptors. The removal of only 50,000 gallons of water or achieving EDB levels of 1000 µg/L will not reduce exposure to contaminant mass. The MCL for EDB is 0.05 µg/L, several orders of magnitude less than the proposed 1000 µg/L. There will also be large amounts of acetone (68,400 µg/L), benzene (70,400 µg/L), methyl ethyl ketone (75,400 µg/L), methyl isobutyl ketone (3560 µg/L), gasoline (22,000 µg/L), and diesel (398,000 µg/L) left in the groundwater [concentrations from July 2000 sampling event]. The Regional Water Quality Control Board (RWQCB) also voiced this concern in their review of the action memorandum.

The proposed pumping amount will also not significantly reduce the potential for off-site migration of the contaminant plumes. To control plume migration, pumping at higher rates, water volumes, and for longer durations will be required to overcome the influence of nearby agricultural wells. Additionally, the proposed extraction location, CL1-MW-12(S) is nearly 950 feet from the boundary of the base. Extraction closer to the distal edge of the plume will be required to control migration.

NASA is requesting detailed answers to these questions as responses to comments on the subject document. NASA feels that the current TCRA is inadequate to meet the goals set out for it and feels the Navy should reconsider the need for this TCRA.

If you have any further questions or comments, please contact me at 650-604-0237.

Sincerely,

Donald M. Chuck
Environmental Services Office

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