



California Regional Water Quality Control Board

Central Valley Region



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CROWS LANDING
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INFORMATION PACKAGE, VERIFICATION OF GROUNDWATER CONDITIONS ALONG BELL ROAD; AND ACTION MEMORANDUM, TIME-CRITICAL REMOVAL ACTIONS AT THE ORIGINAL SEWER SYSTEM, INSTALLATION RESTORATION PROGRAM (IRP) SITE 11A, NATIONAL AERONAUTICS AND SPACE ADMINISTRATION (NASA) CROWS LANDING FLIGHT FACILITY, STANISLAUS COUNTY

We have reviewed the *Information Package, Verification of Groundwater Conditions along Bell Road*, (Report) and *Action Memorandum, Time-Critical Removal Actions (TCRA) at the Original Sewer System, IRP Site 11A, NASA Crows Landing Flight Facility, Stanislaus County* (TCRA Memo), both dated 28 October 2002.

The Report provides a graphical evaluation of the Administration Area Groundwater Plume Time-Critical Removal Action and Interim Removal Action at former IRP Site 117, using groundwater analytical results from 1997 through 2002. The Report also recommends installing four additional piezometers and one extraction well. The Report states that the groundwater extraction for the ongoing Interim Removal Action will shift to the new location between the source area and the property boundary along Bell Road. The Report states that the piezometer/well installation will occur in late November 2002, using the existing *Work Plans, Revision 2*. Extracted groundwater will continue to be shipped offsite for disposal.

The TCRA Memo proposes a soil removal action at Site 11A, the former sewage system. High levels of lead (2,230 mg/kg) and cadmium (15.2 mg/kg) were detected in soils during an investigation conducted in May 2002. The TCRA Memo states that residual lead concentrations will be evaluated using the U.S. Environmental Protection Agency (USEPA), Region IX Preliminary Remediation Goals (PRGs) of 750 mg/kg (lead-contaminated industrial soil). The Navy estimates that 6,200 tons of lead and cadmium contaminated soil will be removed to a depth of approximately 10 feet, and shipped offsite for disposal in a hazardous waste landfill.

General TCRA Memo Comment:

1. The TCRA Memo was released as final and publicly noticed in the local newspaper on 31 October, one day after we received the document at our office. We are concerned that the Navy, while stating in the TCRA Memo that the regulatory agencies will continue to provide input into the process, did not allow adequate review time for the TCRA Memo. This is contrary to our agreement in meetings this summer that the Navy would provide an adequate period for our review of future draft TCRA proposals. We request that, in the future, the Navy provide a minimum of one month for our reviews, prior to releasing the TCRAs for public comment.

We concur with the proposed actions in the Report and TCRA Memo. Please provide 72 hours notice prior to commencement of fieldwork. If you have any questions please contact me at (916) 255-3050 or bartonj@rb5s.swrcb.ca.gov.


James L. Barton, R.G.

Associate Engineering Geologist

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BRAC OFFICE

Transmittal

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NALF Crows Landing

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