



California Regional Water Quality Control Board

Central Valley Region

Robert Schneider, Chair



Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

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25 June 2003

Ms. Lynn Hornecker
BRAC Environmental Coordinator
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REVIEW OF DRAFT ENGINEERING EVALUATION/COST ANALYSIS, INSTALLATION RESTORATION PROGRAM SITE 11, NASA CROWS LANDING FLIGHT FACILITY, STANISLAUS COUNTY

We have reviewed your report entitled *Draft Engineering Evaluation/Cost Analysis, Non-Time Critical Removal Action at Installation Restoration Program Site 11 Disposal Pits, NASA Crows Landing Flight Facility* (draft report), dated 13 June 2003. Our comments are contained in the attached staff memorandum.

We concur with the draft report's recommendation that Alternative Two (excavation and off-site disposal of waste and debris) is the alternative response action that best achieves the criteria of protection of human health and the environment. However, the draft report needs to be revised for the following reasons:

1. Section 3.4 (p. 3-2) of the draft report indicates that removal actions shall attain Applicable or Relevant and Appropriate Requirements (ARARs) under Federal or State environmental laws, in accordance with 40 CFR 300.415(i). The appropriate section for citing this requirement is 40 CFR 300.415(j). The draft report needs to be revised to include the proper reference.
2. Appropriate considerations for ARARs that are not discussed in the draft report include those prescribed by Section 20950 of Title 27, California Code of Regulations, §20005, et seq. (Title 27), which prescribe general closure and post-closure maintenance standards applicable to waste management units for solid waste. The draft report needs to be revised to incorporate consideration of this section of Title 27 as potential ARARs.

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California Environmental Protection Agency

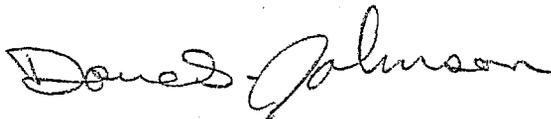


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3. Section 4.2 (p. 4-2) of the draft report describes the alternative to include excavation and off-site disposal of waste from the Site 11 area. The draft report does not describe contentions for monitoring well 11-MW-03(S), located in Area of Concern (AOC) 5. The area known as AOC 5 will be excavated to depths of two feet or more, which may compromise the existing surface seal of this well. The draft report needs to be revised to include contentions for monitoring well 11-MW-03(S), such as installing a new surface seal.

If you have any questions, please call Dale Essary at (559) 445-5093.



DANE S. JOHNSON
Senior Engineering Geologist
CRG No. 4239

—cc: Ms. Francesca D' Onofrio, California Department of Toxic Substances Control, Sacramento
Mr. Alan Berry, California Integrated Waste Management Board, Sacramento
Mr. Don Chuck, NASA Ames Research Center, Moffett Field
Mr. Mike Sonke, Stanislaus County Department of Environmental Resources, Hazardous Materials Division, Modesto
Mr. Richard Jantz, Stanislaus County Chief Executive Office, Modesto
Ms. Ms. Marianna Potacka, Southwest Division, Naval Facilities Engineering Command, San Diego

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BRAC OFFICE



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TO: DANE S. JOHNSON
Senior Engineering Geologist

FROM: DALE E. ESSARY
Water Resource Control Engineer
RCE No. 53216

DATE: 25 June 2003

SIGNATURE: Dale E. Essary

SUBJECT: DRAFT ENGINEERING EVALUATION/COST ANALYSIS, INSTALLATION RESTORATION PROGRAM SITE 11, NASA CROWS LANDING FLIGHT FACILITY, STANISLAUS COUNTY

We received a report entitled *Draft Engineering Evaluation/Cost Analysis, Non-Time Critical Removal Action at Installation Restoration Program Site 11 Disposal Pits, NASA Crows Landing Flight Facility* (draft report), dated 13 June 2003, prepared by Shaw Environmental, Inc., on behalf of the U.S. Navy. The draft report provides recommended removal action alternatives for Installation Restoration Program (IRP) Site 11 at the subject facility. Comments below pertain to my review of the draft report.

Information Provided

Waste materials were discovered in several locations of the IRP Site 11 area during geophysical investigation and exploratory trenching activities performed in 2001, including ash, fibrous materials potentially containing asbestos, and ordnance and explosives (OE). The draft report identifies and analyzes alternative response actions to eliminate or minimize the potential threat posed by the waste and OE materials at IRP Site 11. Included in the draft report are an analysis of potential Applicable or Relevant and Appropriate Requirements (ARARs) to assist in the development and evaluation of removal action alternatives, and a cost analysis of each removal action alternative.

Two response action alternatives were identified and considered: 1) institutional controls with environmental monitoring (i.e., "closure-in-place"); and 2) excavation and off-site disposal of waste and debris (i.e., "clean-closure"). Based on the evaluation of these two alternatives, the draft report recommends the second alternative (excavation and off-site disposal). Waste materials will be sampled for characterization and appropriate disposal prior to excavation. After excavation, samples will be collected from exposed soils to determine compliance with residual ARARs in excavated soils.

Comments

Applicable or Relevant and Appropriate Requirements

Section 3.4 (p. 3-2) of the draft report indicates that removal actions shall attain ARARs under Federal or State environmental laws, in accordance with 40 CFR 300.415(i). The appropriate section for citing this requirement is 40 CFR 300.415(j). The draft report needs to be revised to include the proper reference.

The draft report evaluates various ARARs that potentially affect the development of removal action options. Categories of ARARs include chemical-specific, location-specific, and action-specific requirements as promulgated by State and Federal environmental laws. Appropriate considerations for action-specific ARARs that are not discussed in the EE/CA include those prescribed by Section 20950 of Title 27, California Code of Regulations, §20005, et seq. (Title 27), which prescribe general closure and post-closure maintenance standards applicable to waste management units for solid waste. The draft report needs to be revised to incorporate consideration of this section of Title 27 as potential ARARs.

Alternative No. 2 – Excavation and Off-Site Disposal of Waste and Debris

Section 4.2 (p. 4-2) of the draft report describes the alternative to include excavation and off-site disposal of approximately 14,000 cubic yards of waste and waste/soil mixture from the Site 11 area. The alternative would include the abandonment of groundwater well 11-MW-06(S), which is located within Area of Concern 2 (AOC 2). The abandonment of well 11-MW-06(S) is an appropriate step, as excavation of AOC 2 will proceed to depths of 19 feet or more below ground surface. However, the draft report does not describe contentions for monitoring well 11-MW-03(S), located in AOC 5. The area known as AOC 5 will be excavated to depths of two feet or more, which may compromise the existing surface seal of well 11-MW-03(S). The draft report needs to be revised to include contentions for monitoring well 11-MW-03(S), such as installing a new surface seal.

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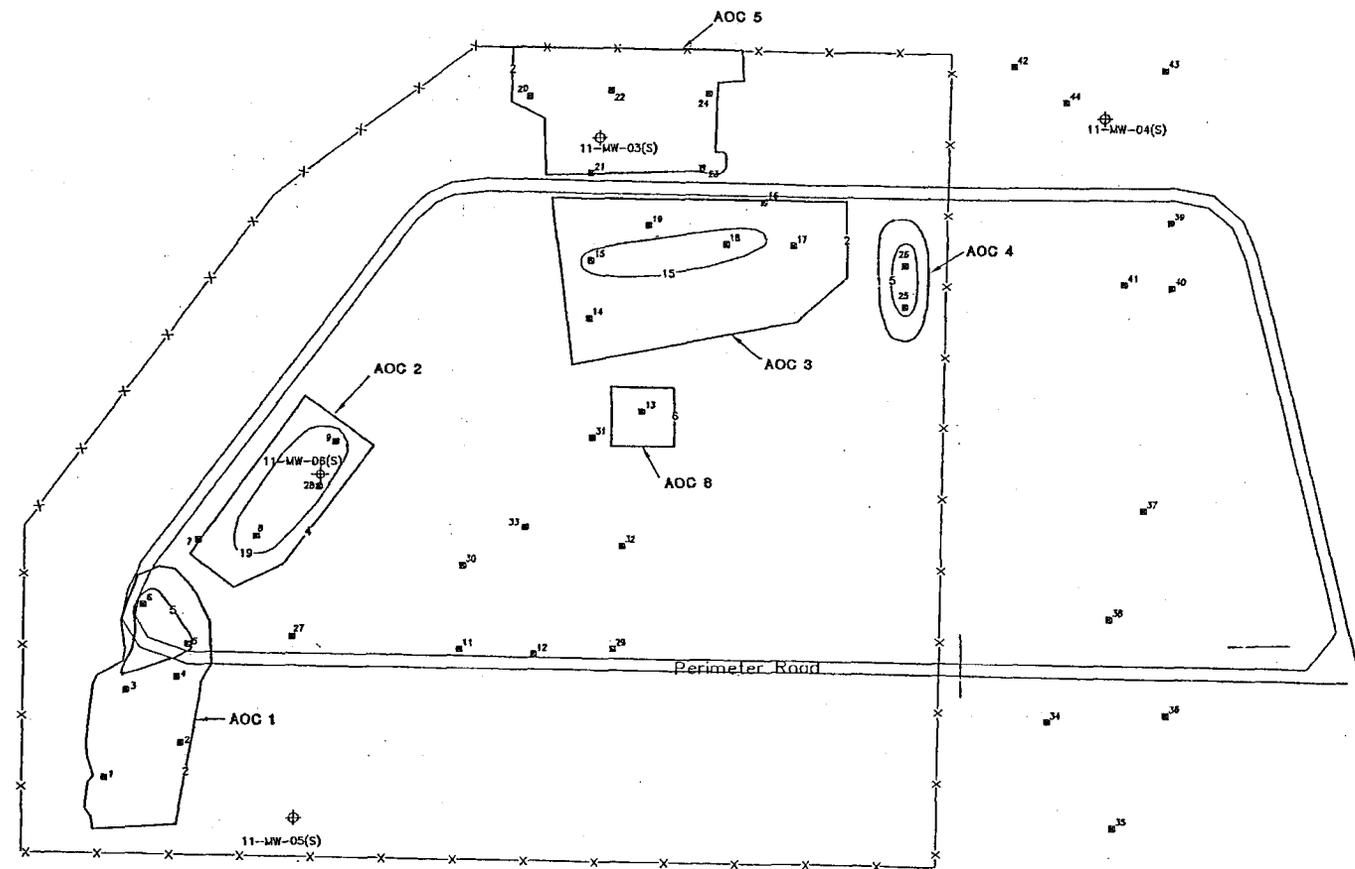
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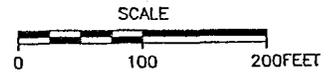
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6/10/03



LEGEND

- ANOMALY/TRENCH LOCATION
- MONITORING WELL
- ROAD
- SITE BOUNDARY
- AREA OF CONCERN (ALSO REFERRED TO AS REMOVAL ACTION AREA)
- SITE INVESTIGATION
- REMEDIAL INVESTIGATION



Shaw Environmental, Inc.
NASA CROWS LANDING FLIGHT FACILITY CROWS LANDING, CALIFORNIA
FIGURE 4 PROPOSED REMOVAL ACTION AREAS IRP SITE 11 EE/CA

MAP SOURCE: FINAL REMEDIAL INVESTIGATION REPORT (PRC 1997), AND INTERIM DATA SUMMARY (IT 2001), AND REVISED DRAFT FINAL FEASIBILITY STUDY (ETI, 2001)

Transmittal

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Code 06CC.LMH

To: Diane Silva
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Administrative Record Manager

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