



California Regional Water Quality Control Board

Central Valley Region

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CROWS LANDING
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PROPOSED AQUIFER TESTING ACTIVITIES, FORMER UNDERGROUND STORAGE TANK (UST) SITE 117 VICINITY, NATIONAL AERONAUTICS AND SPACE ADMINISTRATION (NASA), CROWS LANDING FLIGHT FACILITY, STANISLAUS COUNTY, CALIFORNIA

We have reviewed the *Proposed Aquifer Testing Activities, Former Underground Storage Tank (UST) Site 117 Vicinity, National Aeronautics and Space Administration (NASA), Crows Landing Flight Facility, Stanislaus County (Proposal)*, received 4 June 2001. The Proposal is designed to obtain information to address potential risk for off-site migration of the mixed contaminant groundwater plume (petroleum and chlorinated solvents), due to agricultural and water supply well pumping near Site 117. The Proposal states that limited information exists for the eastern site boundary area aquifer characteristics. The Navy will evaluate pumping rates at four existing monitoring wells and aquifer responses in nearby monitoring wells, in order to better assess the aquifer characteristics. If offsite groundwater plume migration has or may occur without hydraulic containment of the plume, and pumping rates from existing monitoring wells are inadequate, the Navy will install a 6-inch extraction well in this area and initiate a CERCLA Removal Action. Currently the Navy is conducting groundwater sampling by direct push method to determine the lateral extent and possible off-site migration of the groundwater plume.

The Navy proposes to test the following monitoring wells:

- MW117-4
- 117-MW-02
- 117-MW-03
- 117-MW-10 (S)

Pumping tests will run 24-96 hours, depending upon pumping rates, and will not exceed 5000 gallons for wells producing more than 10 gallons per minute (gpm). The anticipated total volume of pumped water is 10,000 gallons, which will be contained, characterized and disposed offsite at an appropriate disposal/treatment facility.

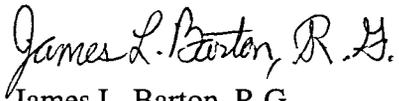
We will concur with the general proposal to conduct aquifer testing in the Site 117 area, after the Navy addresses the following specific comments.

California Environmental Protection Agency

Specific Comments

1. Although monitoring wells 117-MW-02 and 117-MW-03 appear to have not been sampled since February 1999, the Work Plan, Revision 2, Attachment 3 (Work Plan) gives a schedule for analytical sampling of the groundwater produced from the pumping wells during a 48 hour aquifer test (15 minutes, and 8, 24, and 48 hours after starting). Sampling after 15 minutes will be adequate to determine the baseline concentration for the pumped wells. Since the Work Plan does not require sampling beyond 48 hours, and does not anticipate pump tests of an unspecified duration for greater than 10 gpm pumping rates, we also request analytical sampling of the corresponding pumped well immediately after completion of that test.
2. The observed monitoring wells are not listed in this proposal. Provide a list of the observed wells, which will also receive automatic water level data loggers according to the Work Plan.
3. We request inclusion of one round of analytical sampling of the observed monitoring wells, after completion of the entire series of four pumping wells aquifer tests. We also request that all observed monitoring wells in the aquifer testing study, without analytical data from the most recent quarterly sampling event, be sampled prior to starting the aquifer test, in order to establish the baseline for comparison to the post-aquifer test analytical results. Coordinating this pumping test with the expanded (pre- and post-aquifer testing) quarterly groundwater sampling at this location (Site 117) will be useful, providing data for both pre- and post-aquifer testing isoconcentration plots of the observed and pumped wells.
4. NASA has suggested recently that the Navy consider onsite treatment and onsite discharge of the contaminated water produced by the aquifer testing, in lieu of the Navy proposed collection, characterization, and proper offsite disposal. Onsite treatment and discharge will impact the proposed schedule. We suggested onsite treatment and land disposal for aquifer tests in our letters dated 10 October 2000 and 19 October 2000, and encouraged early application for the Board permit. While the Board encourages land disposal for treated groundwater, we require an application/report of waste discharge (RWD) from the Discharger, and Board adoption at a public meeting of the waste discharge requirements (WDRs) for a land disposal permit. Board-adopted WDRs are required for our startup approval of any onsite groundwater treatment and onsite land disposal system. It takes approximately four months after receipt of the RWD for the Board to adopt WDRs. The currently proposed collection, characterization and proper offsite disposal of contaminated groundwater will not impact the scheduled July 2001 startup of the aquifer testing.
5. The proposal to limit, to 5000 gallons, any wells producing greater than 10 gallons per minute would result in tests running less than 8.5 hours each. This may be insufficient to show changes in the water table for the observed wells, depending upon their locations. We suggest that the Navy confirm that the observed wells are responding to the testing, and then evaluate if sufficient data has been collected to finish the test.
6. We request that the Navy share with the agencies all preliminary aquifer testing data before the scheduled Base Cleanup Team meetings. We also request that the Navy notify the agencies immediately if the groundwater plume has moved, or threatens to move, offsite from the facility.

If you have any questions please contact me at (916) 255-3050 or bartonj@rb5s.swrcb.ca.gov.



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TRANSMITTAL

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