



California Regional Water Quality Control Board

Central Valley Region

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CROWS LANDING
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PLANNED GROUNDWATER SAMPLING LOCATIONS AND MONITORING WELL LOCATIONS, ADMINISTRATION AREA PLUME (IRP SITE 17), NATIONAL AERONAUTICS AND SPACE ADMINISTRATION (NASA), CROWS LANDING FLIGHT FACILITY, CROWS LANDING, STANISLAUS COUNTY

We have reviewed the *Planned Groundwater Sampling Locations and Monitoring Well Locations, Administration Area Plume (IRP Site 17), NASA Crows Landing Flight Facility, Crows Landing, Stanislaus County (Work Plan Addendum)*, received as an email attachment from the Navy on 15 October 2001. The Work Plan Addendum provides information on six proposed Hydropunch® groundwater sample locations and twelve new monitoring well locations in and around IRP Site 17. The Work Plan Addendum states that previous groundwater investigations, focused on delineating the plume boundary, have resulted in detections of carbon tetrachloride (CT), chloroform (CF), benzene, and other volatile organic or petroleum compounds. The Work Plan Addendum proposes additional investigation of the plume boundary by Hydropunch® sampling, eight additional plume boundary groundwater monitoring wells in the shallow/mid shallow aquifer zone(s), and four new mid-deep/deep aquifer zone(s) monitoring wells inside the plume at UST Cluster 1 and downgradient of the IRP Site 17 1,2-DCA source area. The Hydropunch® sampling and shallower well installations will use Hollow Stem Auger drilling, while the deeper wells will require Sonic drilling.

General Comments:

1. The field note sketches (drawings) of the proposed Hydropunch® sample locations, on the Appendix A Site-Specific Groundwater Sampling Forms, cover a very small area of the site. A base map showing all sampling locations are needed. Please add the proposed Hydropunch® sample locations to the IRP Site 17 figure, which is labeled Proposed Monitoring Well Locations and now includes the previous Hydropunch® sample locations.
- 2.a). The *Soil Vapor Extraction Optimization for the Remediation of UST Cluster 1 and Site Verification Activities at Various Sites Work Plans, Revision 2, NASA Crows Landing Flight Facility, Stanislaus County (Rev 2)* is referenced in the Work Plan Addendum. Rev 2 provides the standard operating procedures for Hydropunch® sampling and monitoring well installation. After completion of the wells,

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please provide the well logs in a report signed by a California Registered Geologist or Professional Engineer (as required by the California Business Code).

b). Sonic drilling readily facilitates the logging of continuous cores. Please log the lithology/stratigraphy by using continuous coring during the sonic drilling. Also, provide replacement/updated geologic cross section maps for Rev 2.

c). Rev 2 includes large basewide maps of the locations of groundwater sampling points and monitoring wells (maps) as they existed at the time of the document's release. These are very useful maps. Please provide updated maps, showing all of the groundwater sampling locations and monitoring wells, for Rev 2.

3. In our 28 November 2001 BCT meeting, the Navy agreed to study the aquifer response to the NASA fire suppression well. We agreed that because the Navy does not see an influence from pumping of irrigation wells at 2000 feet distance from the plume in the shallow and mid-shallow zone, a 2000-foot buffer zone around the plume would require groundwater pumping restrictions. There is no data on the response of deep monitoring wells to pumping of the irrigation wells. At other sites in the vicinity, response to pumping in the deep zone was observed, when no response was observed in the shallow and intermediate zones. Please add automated dataloggers to the closest mid-deep and deep monitoring wells to the supply wells, and begin monitoring those wells for aquifer responses from the agricultural, and NASA's fire suppression, water wells.

4. Please provide a schedule to us of the proposed field activities, at least 72 hours prior to commencement.

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



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cc: Ms. Francesca D Onofrio – CALEPA-DTSC
Mr. Jim Simpson – Stanislaus County DER
Mr. Donald Chuck, NASA
Ms. Lynn Hornacker – US Navy SWDIV

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