



California Regional Water Quality Control Board

Central Valley Region

Robert Schneider, Chair



Alan C. Lloyd, Ph.D.
Secretary for
Environmental
Protection

Fresno Branch Office
Internet Address: <http://www.swrcb.ca.gov/~rwqcb5>
1685 E Street, Fresno, California 93706
Phone (559) 445-5116 • FAX (559) 445-5910

Arnold Schwarzenegger
Governor

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CROWS LANDING
SSIC NO. 5090.3.A

6 October 2005

Mr. Michael S. Bloom
Department of the Navy
Base Realignment and Closure
Program Management Office West
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8571

22 SEPTEMBER 2005 DRAFT INVESTIGATION SUMMARY REPORT, NATURE AND EXTENT OF DEBRIS AND POTENTIAL IMPACT TO GROUNDWATER AT SITE 11B, NASA CROWS LANDING FLIGHT FACILITY, CROWS LANDING, STANISLAUS COUNTY

We have reviewed the 22 September 2005 *Draft Investigation Summary Report, Nature and Extent of Debris and Potential Impact to Groundwater at Site 11B* at the NASA Crows Landing Flight Facility near Crows Landing in Stanislaus County. Your consultant, Shaw Environmental, Inc., prepared the report. Our comments regarding the report are presented below.

1. We agree that the extent of the buried debris in the Geophysical Anomaly Area Number 1 appears to be adequately defined by using geophysical surveying methods and exploratory trenching. The buried material covers a surface area of approximately 6,100 square feet to a depth of approximately 10 feet below ground surface (approximately 2,300 cubic yards of material). We agree that the soil sampling results appear to indicate the buried debris has not impacted underlying soils.
2. We agree that groundwater beneath Site 11B does not appear to have been impacted by the buried debris, as evidenced by the analytical results of soil sampling conducted during exploratory trenching and the results of groundwater samples collected at locations downgradient to Site 11B along Bell Road. Furthermore, based on the soil and groundwater sampling results, we agree that further investigation regarding groundwater beneath Site 11B does not appear warranted.
3. *Section 4.0 Recommendations* (page 4-1) of the 22 September 2005 draft report provides conclusions regarding the investigation, but does not make any definitive recommendations. Although the buried debris does not appear to pose a threat to underlying groundwater, the buried material does pose a threat to human health (arsenic, lead, several semi-volatile organic compounds, and dioxins were found to be above industrial preliminary remediation goals). As such, a recommendation should be made to excavate the buried debris, remove it from the site, and provide proper disposal of the material. Confirmatory sampling and chemical analysis after excavating the material should be

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conducted. Additionally, after the buried material has been excavated, munitions and explosives of concern (MEC) verification and clearance of Site 11B area should be conducted.

By 23 November 2005, please provide a finalized version of the report addressing the above comments. If you have any questions, please contact Greg Issinghoff at (559) 488-4390.



RUSSELL W. WALLS
Senior Engineer
RCE No. 43140

GJI:gji

- cc: Mr. Don Chuck, NASA Ames Research Center, Moffett Field
Ms. Francesca D'Onofrio, California Department of Toxic Substance Control, Sacramento
Mr. Alan Berry, California Integrated Waste Management Board, Sacramento
Ms. Nicole Damin, Stanislaus County Hazardous Materials Division, Department of
Environmental Resources, Modesto
Mr. Keith Boggs, Stanislaus County Chief Executive Office, Modesto