



# California Regional Water Quality Control Board

## Central Valley Region

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CROWS LANDING  
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10 October 2000

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***NATIONAL AERONAUTICS AND SPACE ADMINISTRATION (NASA), CROWS LANDING FLIGHT FACILITY, CROWS LANDING, CALIFORNIA: MEMORANDUM DATED 11 AUGUST 2000; INTERIM STATUS REPORT DATED 17 AUGUST 2000; AND TECHNICAL INFORMATION PACKAGE DATED 27 SEPTEMBER 2000***

We have reviewed the following three related documents presented by the U.S. Navy Southwest Division (Navy):

- *Potential Revised Groundwater Remediation Strategy for the Administration Area Plume and Other Plumes, NASA Crows Landing Flight Facility (Memo)*, dated 11 August 2000;
- *September 2000 Interim Status Report (Status Report)*, dated 17 August 2000; and
- *Technical Information Package (Data Package), July 2000 Groundwater Sampling Activities, National Aeronautics and Space Administration (NASA), Crows Landing Flight Facility, Crows Landing, California*, dated 27 September 2000.

The Memo proposes strategies to continue investigation and conduct interim response actions, namely construct an extraction well/groundwater treatment system for the mixed hydrocarbon/solvent plume and decommission abandoned irrigation wells. The Status Report provides a chronology of past and proposed future (interim response actions) investigative activities for sites 11 (landfill), Underground Storage Tank (UST) 117, UST 109, UST Clusters 1 (CL1) and 2 (CL2), sewers, abandoned irrigation wells, and automated water level measurement for one or two monitoring wells (datalogger). The Data Package provides a table of results and a raw data report of groundwater analyses from the July 2000 groundwater sampling event, which analyzed Volatile Organic Compounds (VOCs), Total Petroleum Hydrocarbons (TPH) and metals from monitoring wells at UST sites 117 and CL1. The Data Package also includes a drawing with the proposed location of the extraction well, the two plumes (117 and CL1) that now appear to be commingled, and a table of well screen intervals. During a conference call on September 26, 2000, the Navy discussed the Memo, Status Report, and the Data Package that we received the following day. The Navy has discovered high levels of previously unknown contaminants of concern (COCs) in groundwater: Acetone to 68,400 ug/L, Benzene to 70,400 ug/L, Ethylene Dibromide (EDB) to 5080 ug/L, Methyl Ethyl Ketone (MEK) to 75,400 ug/L, and Methyl Isobutyl

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Ketone (MIBK, reported as 4-Methyl-2-pentanone) to 3560 ug/L. Previously Carbon Tetrachloride (CT) was considered the primary COC at 131 ug/L. Methyl t-Butyl Ether (MtBE) was not detected in groundwater.

### Specific Comments

1. The Data Package drawing (sketch) shows the extraction well located closer to monitoring well CL1-MW-03, which provided the highest CT concentration, than to CL1-MW-12S, which has higher concentrations of the new COCs. As stated in our introduction, CT was considered the primary COC before discovery of the additional COCs in July 2000. We suggest that a pump test be conducted using the existing monitoring wells, prior to placing the extraction well(s), in order to optimize placement of the extraction well(s).
2. We believe that the proposed interim response action is a removal action due to the scope of the project, and since installing a pump and treat system will remediate the hydrocarbon/solvent plume. A removal action requires a Workplan that contains the basic elements of an Environmental Evaluation/Cost Analysis (EE/CA) and an Action Memorandum for public comment.
3. The CL1 plume can no longer be considered a petroleum-only groundwater plume, since high levels of solvents are commingled within the plume. All decision documents and remediation of the commingled plume must meet all CERCLA requirements.
4. We encourage the Navy to submit a Report of Waste Discharge for our review as soon as practicable. This will allow us sufficient time to draft and adopt any necessary permits, so that the implementation of the project (specifically, operation of the treatment system) is not delayed while the necessary permits are being obtained. Depending upon the option that the Navy chooses, either an NPDES permit for discharge to surface water, or a Waste Discharge Requirement permit for discharge to land are necessary before treated groundwater may be discharged to water or land.

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



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## TRANSMITTAL

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