

ATTACHMENT A

STATE OF CALIFORNIA-HEALTH AND WELFARE AGENCY
 DEPARTMENT OF HEALTH SERVICES
 Division of Drinking Water and Environmental Management
 31 East Channel Street Room 270
 Stockton, CA 95202



January 7, 1994

David King
 NASA Ames Research Center
 Mailstop NAS-19-01
 Moffett Field, CA 94035-1000

NASA-CROWS LANDING NON-POTABLE WATER SYSTEM

Thank you for your letter of January 4, 1994 concerning the plans of NASA to convert the domestic water system formerly used by the Navy at the Crows Landing airfield into a non-potable water system to provide water for toilet flushing, fire suppression, and landscape irrigation, with bottled water being used for all human consumption. Bert Ellsworth, the Northern California Section Chief was in the Stockton district office when your January 4 letter was received. Mr. Ellsworth reviewed your proposal and concurred that the conversion of the water system to a non-potable system was reasonable in view of the measures you proposed to implement to assure the protection of public health at the facility. Since no one resides at the facility any longer, the water system at the facility is not considered a community water system. In addition, strict control of the non-community use of the facility must be maintained to assure that the system will not again become subject to the regulatory restraints that have prevailed in the past.

NASA must assure that any use of the baseball diamond or any other recreational facilities by the City of Patterson does not involve any domestic use of the water system. This is necessary to avoid regulation of the water system due to the provision of water service to numbers of people that meet or exceed the regulatory threshold of 25 people. Similarly, limiting the regular use of the facilities by NASA employees, visitors, and other personnel associated with the NASA operations to less than 25 individuals and the number of service connections to the water system to less than 15 connections will avoid regulation due to the limited non-community use of the facility. Population excursions of 25 or more people for a cumulative total of less than 60 days per year are acceptable. This should provide NASA with the flexibility needed to accomplish specific tasks that require more than the normal 10 employees to be served by the water system for limited periods of time.

The commitments by NASA outlined in the 16 enumerated items listed in the non-potable water plan in your January 4, 1994 letter establish a program that appears to adequately address the public health issues related to the operation of a facility that provides only bottled water for human consumption and non-potable

water for toilet flushing, fire suppression, and landscape irrigation. If any instances should occur that indicate that these measures do not adequately protect public health, the plan should be amended to assure that public health is protected. In such events, the Department's assistance is available to NASA to address any unforeseen public health issues.

Sign item B has been reviewed and is considered to provide acceptable notification. Please be aware that maintenance of the signs will be necessary. All signs should be inspected periodically to assure that weather, vandalism, and other detrimental effects do not render any of the signs unreadable.

The log sheet for recording chlorine residual monitoring data appears to be acceptable. As you are aware, the maintenance of a chlorine residual in excess of that normally utilized in domestic water systems is important because of the E. Coli contamination that has been found to be present in your non-potable water source recently. In addition, the higher chlorine residual will remain as a deterrent to the human consumption of the non-potable water.

Since the Department finds the non-potable water system plan submitted by NASA in its letter dated January 4, 1994 to be acceptable, the Department is herein reclassifying the NASA-Crows Landing piped water system to be a non-potable water system that is exempt from regulation by the Department.

Enclosed is a sheet that includes definitions from Section 4010.1 on the California Health and Safety Code. If conditions at the NASA-Crows Landing facility should change in the future that result in the facility again meeting the criteria for a public water system, a community water system, or a noncommunity water system, this change must be reported to the Department in writing within 30 days of such a change so that the reclassification of the system to a non-potable water system can be reevaluated.

It has been a pleasure working with your staff since the transfer of the Crows Landing facility to NASA. Their competence, cooperativeness, and professionalism are commendable and have served to provide a plan that should protect public health with little or no outside regulatory involvement.

If you have any questions regarding this matter, contact me at 209-948-3816.

Joseph O. Spano

Joseph O. Spano, P.E.
District Engineer
Drinking Water Field Operations Branch

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ENCLOSURE

CALIFORNIA HEALTH AND SAFETY CODE
DEFINITIONS FROM SECTION 4010.1

THIS ENCLOSURE WAS NOT RECEIVED IN THE
RESTORATION RECORD FILE.

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