



California Regional Water Quality Control Board

Central Valley Region

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CROWS LANDING
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STATUS OF CORRECTIVE ACTION PLAN, NASA CROWS LANDING FLIGHT FACILITY, CROWS LANDING, STANISLAUS COUNTY

You have provided our agency with a summary regarding the status of the corrective action plan (CAP) for underground storage tank (UST) sites Cluster 1, Cluster 2, UST 109, and UST 117. The summary, which included proposed actions related to the CAP and was prepared by Shaw Environmental & Infrastructure (Shaw), was based upon two documents, both prepared by Tetra Tech EM, Inc.: *Final Corrective Action Plan, Underground Tank Sites UST Cluster 1, Cluster 2, 109, and 117* (30 June 1998); and *Draft Corrective Action Plan Addendum, Underground Storage Tanks Sites UST Cluster 1, Cluster 2, 109, and 117* (16 November 1999). The summary was discussed during a teleconference between the Navy, Shaw, and Regional Board staff on 29 January 2004.

The second item under the General Comments section of the summary stated the following:

Existing CAP: Risked-based cleanup goals were not evaluated for groundwater in the CAP because the designated beneficial use of groundwater beneath the base was assumed to be municipal.

Existing Site Condition: Current property transfer documents include language that excludes the use of groundwater for drinking within the areas of the plumes at NASA Crows Landing Flight Facility with a 2000-foot buffer zone. Groundwater may only be used in emergencies for fire suppression.

Proposed CAP Revision: The CAP needs to be revised to incorporate the proposed future use of groundwater at the facility. Groundwater cleanup goals need to be revised accordingly.

The manner in which this item is worded makes it appear that cleanup of groundwater in the buffer zone will be given a less stringent cleanup level. The Regional Board considers the current and future beneficial uses of groundwater in the buffer zone to be municipal, industrial, and agricultural, regardless of the conditional use agreement that exists for groundwater within the buffer zone. As such, cleanup levels for groundwater in the buffer zone will be no different than anywhere else at the Crows Landing

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facility. Because the conditional use buffer zone is in place, the only consideration the Regional Board may give is an extended timeframe to achieve groundwater cleanup goals. The intent of the conditional use agreement is primarily to prevent migration of the groundwater plume and to prevent use of, and human exposure to, contaminated groundwater until cleanup can be achieved.

The third item under the General Comments section of the summary refers to establishing soil cleanup goals by using the computer-modeling program VLEACH to assess the leachability of contaminants in the vadose zone and their potential impact to groundwater. VLEACH is a computer-modeling program available from the United State Environmental Protection Agency. The Regional Board has no objection in using the VLEACH computer program.

Overall, and based on the information thus far provided, the approach the Navy has proposed in pursuing closure for the remaining UST sites at Crows Landing appears to be appropriate.

If you have any questions, please contact Greg Issinghoff at (559) 488-4390.



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