



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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N60211_000780
CROWS LANDING
SSIC NO. 5090.3.A

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FEB 09 2009

Mr. Gregg Issinghoff
California Regional Water Quality Control Board Central Valley Region
Fresno Office
1685 E Street
Fresno, CA 93706-2020

Dear Mr. Issinghoff:

**Subject: AGRICULTURAL IRRIGATION WELLS, ESCOBAR PROPERTY, NASA
CROW'S LANDING FLIGHT FACILITY, CROWS LANDING,
STANISLAUS COUNTY, CALIFORNIA**

Thank you for your November 18, 2008 letter regarding Crows Landing and the adjacent Escobar property. The two agricultural irrigation wells on Escobar property were noted to be of concern due to their relationship to the aquifers in the area and the adjacent carbon tetrachloride contamination. The Water Board requested the old well be properly abandoned due to possible migration of compounds from the water bearing zone above the Corcoran Clay to the water bearing zone below the Corcoran Clay. As discussed on the site walk meeting on January 21, 2009, Mr. John Escobar indicated the old well was filled with crushed rock along the entire interval of the well. Due to this circumstance, the Navy does not believe it is economically feasible to properly abandon this well. The new agricultural well remains and is expected to be used again during the 2009 irrigation season.

As suggested in the letter, the Navy will install a monitoring well just upgradient and in proximity to the two agricultural irrigation wells. The new monitoring well will be screened just below the Corcoran Clay to monitor any affects the pumping well may have on this region.

The Water Board also commented on the Navy's proposed contingency plan which includes monitoring, developing an action level for carbon tetrachloride and other compounds of concern in the irrigation well and the proposed time critical removal action (TCRA) to address elevated levels of contaminants in groundwater. As part of this contingency plan, the Navy has developed a Draft Human Health Risk Assessment (HHRA). The Draft HHRA was submitted November 17, 2008 and presents methodology and calculation for the site specific carbon tetrachloride action level.

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Upon regulatory approval, the Navy will use the action levels proposed in the HHRA for the contingency TCRA. The Draft HHRA proposes using the monitor well 17-MW-42(D) to monitor compounds of concern. If the action level specified in the Draft HHRA is met in the monitor well, the TCRA will be conducted to manage the potential risks with the irrigation water. The monitor well 17-MW-42(D) is located approximately 350 feet upgradient of the irrigation well. This distance should allow enough time to address the Water Board's time-lag concern.

The Navy believes that the installation of the new monitor well immediately upgradient and adjacent to the irrigation wells addresses the issues of monitoring below the Corcoran Clay for contamination. The Navy will install the new monitor well and provide a draft contingency plan by the end of February 2009.

If you have any questions or comments, please call Ms. Heather Wochnick at (619) 532-0763, or me at (619) 532-0966.

Sincerely,



JAMES SULLIVAN
BRAC Environmental Coordinator
By direction of the Director

Copy to:
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