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California Regional Water Quality Control Board Central Valley Region

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Arnold
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CROWS LANDING
SSIC NO. 5090.3.A

8 June 2009

Mr. Jim Sullivan
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

17 APRIL 2009 DRAFT ACTION MEMORANDUM, CERCLA TIME-CRITICAL REMOVAL ACTION FOR THE OFF-SITE ADMINISTRATION AREA PLUME, GROUNDWATER USED FOR AGRICULTURAL IRRIGATION, FORMER NASA CROWS LANDING FLIGHT FACILITY, CROWS LANDING, STANISLAUS COUNTY

Staff's only comment on the subject Draft Action Memorandum is as follows:

- Section 3.2 Threats to the Environment. A situation exists where the orchard could be irrigated with water containing carbon tetrachloride (CCl₄). Treatment of the irrigation water from the Escobar well will not begin until CCl₄ reaches the risk based concentration (RBC) of 35 micrograms per liter (µg/L) in monitoring well 17-MW-42(D). As such, under worse case conditions, the orchard could be irrigated with water containing up to 34 µg/L CCl₄. A statement needs to be added (and supported) saying that irrigating with water that contains up to 34 µg/L of CCl₄ is protective of the groundwater resources beneath the orchard.

Central Valley Water Board staff understands that the Draft Action Memorandum will remain in draft version until and if the 35 µg/L RBC is reached in monitoring well 17-MW-42(D). If the RBC is reached, the Action Memorandum will be made final and will be implemented. As such, a complete second draft is not necessary to submit; only the changes to Section 3.2 would be sufficient.

By 3 July 2009, please submit the requested revision. If you have any questions regarding the above, please call Greg Issinghoff at 559-488-4390.

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Senior Engineer
RCE No. 43140

GJI:gji

See attached sheet for cc list

California Environmental Protection Agency

cc: Ms. Francesca D'Orofrío, Department of Toxic Substances Control, Sacramento
Mr. Alan Berry, California Integrated Waste Management Board, Sacramento
Mr. Don Chuck, NASA Ames Research Center, Moffett Field
Mr. Gary Munekawa, Moffett Federal Airfield, Moffett Field
Mr. Keith Boggs, Stanislaus County Chief Executive Office, Modesto
Ms. Nicole Damin, Stanislaus County Department of Environmental Resources, Modesto
Mr. Kirk Ford, Stanislaus County Planning and Community Development, Modesto
Mr. Hamlet Hamparsumian, Tetra Tech EC, Inc., Santa Ana