



Department of Toxic Substances Control



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May 27, 2009

Mr. Jim Sullivan
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**DRAFT ACTION MEMORANDUM COMPREHENSIVE ENVIRONMENTAL
RESPONSE, COMPENSATION, & LIABILITY ACT TIME-CRITICAL REMOVAL ACTION
AND DRAFT WORKPLAN FOR THE OFF-SITE ADMINISTRATION AREA PLUME
GROUNDWATER USED FOR AGRICULTURAL IRRIGATION, FORMER NASA
CROWS LANDING FLIGHT FACILITY, CROWS LANDING, APRIL 17, 2009**

Dear Mr. Sullivan:

Thank you for the opportunity to review the above referenced documents which were prepared as a response to the groundwater plume located off-site from the Crows Landing Facility (Facility). As noted, the adjacent property is owned privately by Mr. Escobar and is a productive almond orchard. Groundwater monitoring sampling data indicates the Facility's Administration Area carbon tetrachloride (CCl₄) plume has migrated off-site to Mr. Escobar's property and irrigation well.

TIME CRITICAL REMOVAL ACTION (TCRA)

A risk assessment conducted in 2008 concluded CCl₄ may pose a risk to human health or orchard workers at concentrations above a risk-based concentration (RBC) of 35 micrograms per liter (ug/L). The plume extends off-site in an easterly pattern and November 2008 sampling data indicated the presence of CCl₄ in the deep interval groundwater zone at a maximum concentration of 11 ug/L. As a result of increasing off-site trends, the action memorandum (AM) has been submitted for review and comment.

The purpose of the proposed removal action (RA) is to reduce CCl₄ concentrations in groundwater extracted from the off-site agricultural supply well. The RA includes the

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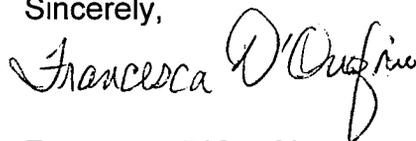
installation of a groundwater treatment system, system maintenance and groundwater monitoring. The system proposed will treat the impacted irrigation well water via a granular activated carbon filtration system. Monitoring will occur every two weeks during the six month irrigation period of approximately March to September. The action is precautionary and will be implemented in the event CCL₄ concentrations exceed the RBC of 35 ug/L.

Additionally, as discussed in Section 2.4 of the work plan the U. S. Navy has agreed to install an additional monitoring well near Mr. Escobar's irrigation well. In the final document, please provide the proposed date of installation, design specifications and an illustrative inclusion of the proposed well on Figure 1-2.

Based on our review, the Department of Toxic Substances Control agrees with the proposed activities as outlined in the AM and the work plan as a contingency response to off-site migration of the Facility plume.

If you have any questions regarding this letter, please contact me at (916) 255-3603 or fdonofri@dtsc.ca.gov.

Sincerely,



Francesca D'Onofrio
Hazardous Substances Scientist
Sacramento Office
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