



California Regional Water Quality Control Board

Central Valley Region

Robert Schneider, Chair



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Secretary for
Environmental
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16 February 2005

Mr. Michael S. Bloom
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Base Realignment and Closure
Program Management Office West
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28 JANUARY 2005 DRAFT FINAL PROJECT PLANS, NATURE AND EXTENT OF DEBRIS AND POTENTIAL IMPACT TO GROUNDWATER AT INSTALLATION RESTORATION PROGRAM SITE 11B, NASA CROWS LANDING FLIGHT FACILITY, CROWS LANDING, STANISLAUS COUNTY

We have reviewed the 28 January 2005 *Draft Final Project Plans, Nature and Extent of Debris and Potential Impact to Groundwater at Installation Restoration Program Site 11B*. Your consultant, Shaw Environmental, Inc, prepared the document. Our comment regarding the proposed investigation at Site 11B is presented below.

The proposed plan to assess Site 11B calls for six locations where cone penetration testing (CPT) and direct push technology (DPT) sampling will be undertaken along the down-gradient (eastern) edge of Site 11B on Bell Road. Discrete groundwater samples are to be collected at the shallow interval (at the water table, a depth of approximately 70 feet below grade) and the mid-shallow interval (a depth between approximately 90 to 120 feet below grade). The groundwater samples will be analyzed for the following constituents.

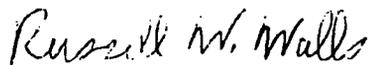
- Volatile organic compounds (VOCs) by EPA Method 8260B
- Title 22 metals (dissolved) by EPA Method 6010B/7470A
- Total petroleum hydrocarbons (TPH) as gasoline and as jet fuel by EPA Method 8015B
- Semi-volatile organic compounds (SVOCs) by EPA Method 8270C
- Perchlorate by EPA Method 314.0 (if perchlorate is detected by 314.0, confirmation analysis will be performed using Liquid Chromatography/Mass Spectrometry [LC/MS] Modified EPA Method 8321)

California Environmental Protection Agency

This sampling approach appears reasonable. However, in the interest of being thorough, additional groundwater samples should be collected within the Site 11B boundaries. Site 11B is a relatively large area, with its largest dimensions measuring approximately 350 feet by 750 feet. As such, limiting groundwater assessment to only downgradient locations, as proposed, could possibly miss contaminants in such a large area. Therefore, after munitions and explosives of concern (MEC) clearance is completed, we request that a minimum of three additional CPT/DPT sampling points be located within the boundaries of Site 11B. The same sampling protocol (e.g., groundwater sampling depth intervals and chemical analysis) proposed for the six downgradient CPT/DPT sampling points along Bell Road should also be followed for groundwater sampling within Site 11B.

After MEC clearance is completed and data are assessed, we request you submit a map showing the additional proposed CPT/DPT locations within Site 11B.

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



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GJI:gji

cc: Ms. Francesca D'Onofrio, California Department of Toxic Substance Control, Sacramento
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Mr. Richard Jantz, Stanislaus County Chief Executive Office, Modesto