



Appendix P

GROUNDWATER DOCUMENTATION



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Coast Regional Water Quality Control Board

February 18, 2014

Mr. Jerry Vincent
U.S. Army Corps of Engineers
Sacramento District
1325 J Street
Sacramento, CA 95814-2922
gerald.e.vincent@usace.army.mil

Mr. Tom Greer
Monterey Peninsula Airport District
200 Fred Kane Drive, Suite 200
Monterey, CA 93940
tgreer@montereyairport.com

Dear Mr. Vincent and Mr. Greer:

FORMER NAVAL AUXILIARY AIR STATION (NAAS), MONTEREY, J09CA1500, APPROVAL OF "NO DEPARTMENT OF DEFENSE ACTIONS INDICATED" (NDAI) REPORTS FOR TRICHLOROETHYLENE (TCE) PLUME AND SITE-WIDE PROJECTS

Central Coast Regional Water Quality Control Board (Water Board) staff has reviewed the TCE Plume and Site-Wide NDAI Reports (Reports), prepared by the United States Army Corps of Engineers, and received on January 20 and 26, 2014, respectively.

The groundwater contaminants, consisting primarily of TCE and petroleum products, have been characterized and remediated using two treatment systems – one at the Casanova Oak Knolls Community Center, and the other in the Monterey Peninsula Airport's light industrial area north of the airport runways. The success of the groundwater treatment systems was evaluated and approved for closure by Water Board staff in the Army Corps of Engineer's December 19, 2013 Draft Final Feasibility Study.

The Site Wide projects were reviewed and received written approval by Water Board staff in numerous stages as documented in the Site Wide Projects NDAI attachments.

Water Board staff accepts the Army Corps' subject NDAI reports as the final documentation of no further actions required for the subject investigations and cleanups. Should future evidence of site contamination come to our attention, the Water Board reserves the right to require additional site investigation and cleanup actions, if necessary. If you have any questions regarding this matter, please call **Grant Himebaugh at (805) 542-4636**, or **Sheila Soderberg at (805) 549-3592**.

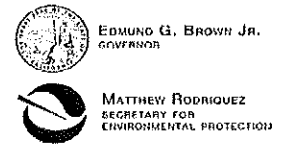
Sincerely,

Digitally signed by Kenneth A Harris Jr.
DN: cn=Kenneth A Harris Jr., o=Central
Coast Regional Water Quality Control
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c=US
Date: 2014.02.18 14:30:15 -08'00'

Kenneth A. Harris Jr.
Executive Officer

DR. JEAN-PIERRE WOLFF, CHAIR | KENNETH A. HARRIS JR., EXECUTIVE OFFICER

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Central Coast Regional Water Quality Control Board

December 19, 2013

Mr. Jerry Vincent
U.S. Army Corps of Engineers
Sacramento District
1325 J Street
Sacramento, CA 95814-2922
gerald.e.vincent@usace.army.mil

Mr. Tom Greer
Monterey Peninsula Airport District
200 Fred Kane Drive, Suite 200
Monterey, CA 93940
tgreer@montereyairport.com

Dear Mr. Vincent and Mr. Greer:

NAVAL AUXILIARY AIR STATION MONTEREY, ACCEPTANCE OF DRAFT FINAL FEASIBILITY STUDY, TRICHLOROETHENE AND PETROLEUM PLUMES

Central Coast Regional Water Quality Control Board (Water Board) staff has reviewed the subject report, prepared by the U.S. Army Corps of Engineers, and received on October 24, 2013. In the report, the Army Corps evaluates the effectiveness of multiple cleanup remedies employed for both subject plumes, and makes a recommendation of no further action/site closure.

Water Board staff agrees with report's findings and the recommendation for no further action, and appreciates the considerable efforts the Army Corps has made to communicate project cleanup status with the surrounding community and government officials. A few minor changes have occurred subsequent to the Army Corps' issuing this report. For completeness, they are noted in the following comments:

General Comments:

1. The report lists all groundwater monitoring wells in the airport neighborhood for destruction in compliance with Monterey County standards. However, a November 13, 2013 meeting with airport neighborhood residents has resulted in a minor change to this proposal. The City of Monterey is now in the process of taking over three of the Army Corps' groundwater monitoring wells. These wells are MW-20 on Casanova Avenue, MW-14 on Euclid Avenue, and MW-22 on Fremont Street.

The City agrees to provide standard maintenance and security and to monitor the three wells for trichloroethene (TCE) using USEPA method 8260B. The sampling frequency should be once every three to five years, in agreement with Casanova Oak Knolls community requests. Our staff has assured City engineering staff that this monitoring is **not** part of any regulatory action. The Water Board views the City's monitoring of these three wells as a completely voluntary act, with the purpose of offering additional peace of mind to airport neighborhood residents. Upon the City's agreement with the community to terminate groundwater monitoring, the City agrees to pay for proper well destruction pursuant to standard Monterey County requirements. Water Board staff greatly appreciates the City's providing this service to local residents. If the Army Corps were to

JEFFREY S. YOUNG, CHAIR | KENNETH A. HARRIS JR., EXECUTIVE OFFICER

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continue its presence on the project to provide this small service, it would trigger hundreds of thousands of dollars in additional administrative costs.

2. The Army Corps agrees to remove all visible CONA park treatment system structures and infrastructure and return the park landscape to pre-cleanup conditions. It was previously thought possible that the City might take over limited parts of the treatment plant structure, although subsequent discussions have resulted in the City's request for complete removal of all CONA park facilities. As of the drafting of this letter, this removal work has begun.
3. The Airport will take over ownership and responsibility of several TCE source area extraction and monitoring wells. (The monitoring wells may be converted into extraction wells.) The Water Board has no objection to the Airport's taking over these wells as water from these wells meets drinking water standards. The Airport will also have the standard responsibility of proper well security, maintenance and, if necessary, destruction.

As a standard point of disclosure during site closure, should Water Board staff become aware of additional information warranting additional investigation or cleanup at the subject site, we reserve the right to require the Army Corps of Engineers to perform these potential actions.

Over the last 13 years, over \$18 million has been spent on the characterization and cleanup of these two solvent and petroleum groundwater plumes. Without the combined efforts of concerned community members, local politicians, and Army Corps staff, this cleanup would not be anywhere near as successful as what we've experienced.

We thank Jerry Vincent and his staff at the Army Corps of Engineers, and the many other parties involved in this cleanup; in particular, CONA representative Richard Ruccello and U.S. Congressman Sam Farr and his staff for their exceptional degree of commitment and cooperation in making this project a success. If you have any questions regarding this letter, please call **Grant Himebaugh at (805) 542-4636**, or Sheila Soderberg at (805) 549-3592 (email addresses below).

Sincerely,



Digitally signed by Kenneth A Harris Jr.
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Regional Water Quality Control Board,
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email=Ken.Harris@waterboards.ca.gov, c=US
Date: 2013.12.19 09:23:17 -08'00'

Kenneth A. Harris, Jr.
Executive Officer

S:\DoD\DoD Facilities\FUDS\Monterey Peninsula Airport\Correspondence\TCE plume\TCEFSAppDec2013

cc:

- Mr. Richard Ruccello, CONA, ruccello@aol.com
- Mr. Alec Arago, alec.arago@mail.house.gov
- Mr. Mark Bautista, Monterey Peninsula Airport, mbautista@montereyairport.com
- Mr. Tom Reeves, City of Monterey, reeves@monterey.org
- Ms. Olga Vargas, Monterey County Dept. of Health, VargasO@co.monterey.ca.us
- Ms. Carrie Tatoian-Cain, Dept. of Toxic Substances Control, Carolyn.Tatoian-Cain@dtsc.ca.gov
- Mr. Ian Waters, State Water Resources Control Board, Ian.Waters@waterboards.ca.gov
- Mr. Grant Himebaugh, Water Board, grant.himebaugh@waterboards.ca.gov
- Ms. Sheila Soderberg, Water Board, Sheila.soderberg@waterboards.ca.gov

Feasibility Study

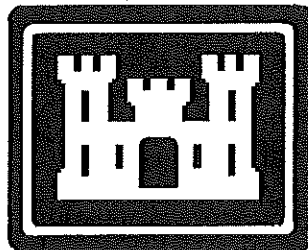
Trichloroethene and Petroleum Plumes
Naval Auxiliary Air Station Monterey
Formerly Used Defense Site

Monterey, CA
DERP-FUDS No. J09CA150002

FINAL

December 2013

Prepared for:



U.S. Army Corps of Engineers
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Prepared by:

Cardno EM-Assist
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Disclaimer

This report revision was prepared by Cardno EM-Assist under subcontract to Oneida Total Integrated Enterprises. Oneida Total Integrated Enterprises initiated this work under Task Order 2 of Contract W912PP-0010-D-017 with the U.S. Army Corps of Engineers. This report is based upon the draft report prepared by TRW Systems for the U.S. Army Corps of Engineers and work conducted previously by EM-Assist under contract to the U.S. Army Corps of Engineers. The recommendations of this report are based on information collected at and near the former Naval Auxiliary Air Station, Monterey by various organizations including the U.S. Army Corps of Engineers and other organizations some of which were contracted by the U.S. Army Corps of Engineers. The recommendations of this plan are based on the professional judgment of Cardno EM-Assist staff and do not necessarily reflect the official position of the U.S. Army Corps of Engineers, Monterey Peninsula Airport District, or other agencies responsible for the clean up of the former Naval Auxiliary Air Station, Monterey.

Acceptance of this document in performance of the contract under which it is prepared does not mean the U.S. Army Corps of Engineers adopts the conclusions, recommendations, or other views expressed herein, which are those of Cardno EM-Assist staff only. Background information and other data have been furnished to Cardno EM-Assist by the U.S. Army Corps of Engineers or other sources, which Cardno EM-Assist has used in preparing this document. Cardno EM-Assist has relied on this information as furnished, and is not responsible for and has not confirmed its accuracy. This document has been prepared based on assumptions made by Cardno EM-Assist, which may substantially affect the conclusions and recommendations of this report. These assumptions, although thought to be reasonable and appropriate, may not prove true in the future. Cardno EM-Assist conclusions and recommendations are conditioned upon these assumptions.

7.0 Conclusions and Recommendations

The nature and extent of the contaminated soil and groundwater at the former NAAS Monterey, two groundwater plumes required remedial actions. Based on the analysis of alternatives, no further action is warranted for the Petroleum and TCE Plume. Previous treatability studies have resulted in the reduction in soil and groundwater contamination to the extent that the area of the Petroleum Plume qualifies for closure under the low-threat petroleum UST policy of SRWQCB Resolution 2012-0016. The remediation completed in both the Petroleum and TCE plumes as part of treatability testing, in conjunction with County of Monterey well prohibition ordinance, has resulted in both plumes presenting *de minimus* risks under CERCLA. As such, further remediation would not be prudent or economical based on the *de minimus* risks to human health or the environment.