



Department of Toxic Substances Control

N60211_000414
CROWS LANDING
SSIC NO. 5090.3.A



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency
June 13, 2002

Edwin F. Lowry, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Gray Davis
Governor

Ms. Lynn Hornecker
Southwest Division, Naval Facilities Engineering Command
BRAC Program Office
1220 Pacific Highway
San Diego, California 92132-5190

REVISED FEASIBILITY STUDY (FS), INSTALLATION RESTORATION PROGRAM
(IRP) SITE 11 DISPOSAL PITS, NASA CROWS LANDING FLIGHT FACILITY,
STANISLAUS COUNTY

Dear Ms. Hornecker:

Thank you for the opportunity to review the above-referenced document. Based on our review, we have the following comments to provide:

General Comment

Four alternatives were evaluated in the report. The alternatives include no action, restriction of access, prescriptive capping, and excavation and off-site disposal. As previously discussed, please explain why a vegetative cap was not included in the alternatives. Since the data to date does not indicate any impact to groundwater from the site, a vegetative cover may be an appropriate and cost-effective alternative. In addition, the document did not reach a conclusion on the Navy's preferred alternative. Please provide a section that states the Navy's proposed preferred alternative and a summary of the reasons for your selection.

Ordnance

The FS discusses the existence of inert ordnance items identified within the Site 11 investigation boundary. The ordnance materials were identified during the unexploded ordnance (UXO) avoidance surveys that were conducted in support of geophysical surveying activities. However, the FS does not go into any detail on how the Navy intends to investigate, remove and dispose of UXO on site. Therefore, prior to finalizing the FS and before development of the proposed plan, the State requests a detailed summary of how the Navy intends to address this issue. Given the potential risk to worker safety and human health, we are sending, under a separate cover letter to be

Ms. Lynn Hornecker
June 13, 2002
Page 2

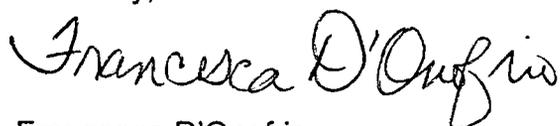
mailed by June 21, 2002, a detailed letter outlining our comments and recommendations. Please address these comments in the draft final revised FS.

Specific Comments:

- 1) Several typographical errors are noted with respect to Figure 2-1. For example, the text accompanying this figure references two monitoring wells. However, the figure shows the location of six monitoring wells. Please review this section for clarity and make any necessary editorial and illustrative corrections.
- 2) Sampling location discussions in the Site Investigation Study section and the Remedial Investigation Study presented in Section 2.2 lack sufficient detail for efficient evaluations. The text in these sections do not specifically identify the soil boring locations, well locations or hydro punch locations by identification number to reference the data or information presented. DTSC suggests correcting the problem by directly referencing specific soil boring; hydro punch or monitoring wells as appropriate in the final version of the FS.
- 3) The FS addresses a requirement for groundwater monitoring in Section 4.1.2, Alternative 2, Institutional Controls. However groundwater monitoring is not addressed for section 4.1.3, Alternative 3, Title 27 Prescriptive Cap. Since groundwater monitoring is also required under Alternative 3, please correct the document to include this requirement.

Please contact me at (916) 255-3603 if you have any questions regarding these comments.

Sincerely,



Francesca D'Onofrio
Hazardous Substances Scientist
Office of Military Facilities

cc: Ms. Marianna Potacka
BRAC Environmental Coordinator
Southwest Division, Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

Ms. Lynn Hornecker
June 13, 2002
Page 3

cc: Mr. Jim Simpson
Hazardous Materials Division
Stanislaus County of Environmental Resources
3800 Cornucopia Way, Suite C
Modesto, California 95358-9492

Mr. Don Chuck
NASA Ames Research Center
Office of Environmental Services
MS 218-1
Moffet Field, California 94035-1000

Transmittal

Date: 24 June 2002

From: Lynn Marie Hornecker
Code 06CC.LMH

To: Diane Silva
Code ~~01LS.DS~~ 05G.DS
Administrative Record Manager

Subj: CERCLA ADMINISTRATIVE RECORD MATERIALS
NALF Crows Landing

Installation: NALF Crows Landing

UIC Number: N60211

Document Title: Revised FS, IRP Site 11 Disposal Pits

Author: Francesca D'Onofrio DTSC

Recipient: Lynn Hornecker Navy

Record Date: 13 June 2002

Approximate Number of Pages: 3

Sites: 11

Key Words: DTSC comments, FS

Contract: N/A

CTO Number: N/A