



# Department of Toxic Substances Control

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Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency  
July 16, 2002

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

Gray Davis  
Governor

N60211\_000422  
CROWS LANDING  
SSIC NO. 5090.3.A

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 - CLEANUP OF ORDNANCE AND EXPLOSIVES (OE)

Dear Ms. Hornecker:

Attached are DTSC's specific comments on the subject document related to OE at IRP Site 11. The comments were written by Mr. James Austreng, State Unexploded Ordnance Coordinator. Please address and respond to these comments in the draft final FS document. Mr. Austreng and I are available to meet and discuss these comments in the near future.

If you have any questions concerning these comments and would like to schedule a meeting to discuss them, please do not hesitate to contact me at (916) 255-3603.

Sincerely,

Francesca D'Onofrio  
Hazardous Substances Scientist  
Office of Military Facilities

Attachment

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

Ms. Lynn Hornecker  
July 16, 2002  
Page 2

cc: Mr. Jim Simpson  
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Stanislaus County of Environmental Resources  
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# Department of Toxic Substances Control

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## MEMORANDUM

TO: Francesca D'Onofrio  
Project Manager  
Office of Military Facilities  
Department of Toxic Substances Control

Via: Donn Diebert, P.E. *DD*  
Chief, Open Base Navy and FUDS Unit  
Office of Military Facilities  
Department of Toxic Substances Control

From: James C. Austreng, P.E. *JCA*  
State Unexploded Ordnance Coordinator  
Office of Military Facilities  
Department of Toxic Substances Control

Date: July 1, 2002

SUBJECT: FEASIBILITY STUDY, INSTALLATION RESTORATION PROGRAM (IRP)  
SITE 11 DISPOSAL PITS, NASA CROWS LANDING FLIGHT FACILITY,  
DATED, NOVEMBER 2001

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The following provides comments on the subject document and an accompanying May 29, 2002 email from Ms. Lynn M. Hornecker, Naval Facilities Engineering Command. As requested, my review focused on issues pertaining to the investigation and clean up of ordnance and explosives (OE).

### GENERAL COMMENTS:

Ms. Hornecker's May 29, 2002 email states- "The UXO [unexploded ordnance] avoidance surveys were not intended to provide UXO clearance for Site 11 (disposal pits) or the adjacent bunker area." My primary concerns with the document is the

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.  
For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

limited information regarding the approach taken, the associated costs and long term risk management the Navy would use to address OE. That is, while I recognize the efforts to date were limited to OE avoidance and the Navy has stated they will address details of OE following the finalization of the Proposed Plan, it remains my conclusion that too little information is provided as to the level of effort needed for OE detection, removal and treatment. In addition, because of the absence of information, I was unable to evaluate the level of effort planned for quality control/quality assurance. Until such details are provided, reviewed and concurred with by the Department of Toxic Substances Control (DTSC), I suggest the document remain in draft form.

Other concerns I noted were with the statements regarding the facility as a whole. On page 1-1, the following is noted - "It [the flight facility] originally served as a training field during World War II." And on page 2-1, the following is provided "...two nearby practice bombing ranges." What actions are planned to address the potential OE at these locations?

**SPECIFIC COMMENTS:**

- 1) There is no discussion of the Explosive Safety Submission (ESS) and time lines for the Department of Defense Explosive Safety (DDESB) review. It is DTSC's practice that the ESS be included in the investigative report and DDESB's concurrence be obtained prior to initiating the response action. In addition, details of detection efforts, technology selection, ordnance removal and treatment must be provided in order to perform a detailed analysis of alternatives. This is particularly critical for Alternative 4 (Refuse removal and clean closure). Significant costs and technical complications will undoubtedly arise due to the potential presence of OE. The notation that asbestos containing material will also affect the feasibility of this alternative. And for the other alternatives, long term risk management costs must be identified and included in the feasibility analysis. This includes the cost differential of property values (clean closure vs. closure with waste in place).
- 2) Details of technology selection, quality control/quality assurance, need to be provided. This includes use of a third party, an independent contractor to implement an OE Quality Assurance Plan.
- 3) While Applicable or Relevant and Appropriate Requirements (ARARs) are identified, the Navy has not cited California Code of Regulations, Section 66264.600 as an applicable requirement. Section 66264.600, Miscellaneous

Units, governs the treatment of hazardous waste. In order to comply with Section 66246.600, an analysis of impacts from treatment of hazardous waste, including OE, as well as alternatives to treatment (open detonation) must be included and submitted for public review prior to the response action. The analysis and review period can be incorporated into the subject document provided the public-notice process identifies that such action is taking place.

- 4) All raw and processed geophysical data should be provided to DTSC as part of the final document.
- 5) The document was submitted without the signature of a California licensed professional.

**CONCLUSION:**

As indicated above, concerns have been identified as a result of the Navy's plan to address OE following finalization of the Proposed Plan. Because significant costs are associated with OE detection, removal and treatment, as well as with quality control/quality assurance efforts, the Navy's plan to delay addressing these project needs may compromise efforts to comply with requirements of the Comprehensive Environmental Response, Compensation and Liability Act, California Code of Regulations and California Health and Safety Code.

If you have any questions, I can be reached at (916) 255-3702.

## Transmittal

Date: 19 July 2002

From: Lynn Marie Hornecker *ZMH*  
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 Feasibility Study, IRP Site II, Cleanup  
of ordnance  
and explosives  
(OE)*

Author: *Francesca D'Onofrio DTSC*

Recipient: *Lynn Hornecker SWDIV*

Record Date: *16 July 2002*

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