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5090
Ser BPMOW.MLH/0433
May 12, 2006

Ms. Francesca D'Onofrio
California Department of Toxic Substances Control
Office of Military Facilities
8800 Cal Center Drive
Sacramento, California 95826

Dear Ms. D'Onofrio:

Subj: FINAL REMOVAL ACTION REPORT, NON-TIME CRITICAL REMOVAL ACTION,
INSTALLATION RESTORATION PROGRAM SITE 11, NASA CROWS LANDING
FLIGHT FACILITY, CROWS LANDING, CALIFORNIA

Enclosed is the Final Removal Action Report, Non-Time Critical Removal Action, Installation Restoration Program Site 11, NASA Crows Landing Flight Facility, Crows Landing, California. Also enclosed is the response to comments on the draft document that preceded this final report.

If you have questions, please contact the Remedial Project Manager for the project, Ms. Michelle Hurst at (619) 532-0939.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael S. Bloom".

MICHAEL S. BLOOM
BRAC Environmental Coordinator
By direction of the Director

- Encl: (1) Final Removal Action Report, Non-Time Critical Removal Action, Installation Restoration Program Site 11, NASA Crows Landing Flight Facility, Crows Landing, California (May 12, 2006)
- (2) Response to comments on Draft Removal Action Report, Non-Time Critical Removal Action, Installation Restoration Program Site 11, NASA Crows Landing Flight Facility, Crows Landing, California (March 8, 2006)

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N60211_000668
CROWS LANDING
SSIC NO. 5090.3

ENCLOSURE 1

FINAL
REMOVAL ACTION REPORT
NON-TIME CRITICAL REMOVAL ACTION
INSTALLATION RESTORATION PROGRAM SITE 11

DATED 12 MAY 2006

THIS RECORD IS ENTERED IN THE DATABASE AND FILED AS

RECORD NO. N60211_000667

**Response to Comments on the Draft Removal Action Report, Non-Time Critical Removal Action, Installation Restoration Program Site 11, NASA Crows Landing Flight Facility, Crows Landing, California
Originally Published March 8, 2006 as Document Control Number 9785**

Comments by: Francesca D'Onofrio, Hazardous Substance Scientist, Department of Toxic Substances Control, Office of Military Services, dated May 11, 2006			
Comment No.	Section, Figure, Table	Comment	Response
Specific Comment 1	Section 3.5.7 Data Usability page 3-12	AOC 2 and AOC 5 are listed as having 22 and 35 primary confirmation samples taken, respectively. However, the text and figures state 21 and 34 samples were taken at these locations. Please address the discrepancy.	<p>As discussed in paragraph six of Section 3.4.3 AOC 2 (page 3-6), sample AOC2-05 was collected from the northern wall of the deep excavation prior to additional excavation. Sample AOC2-006 was collected after the over-excavation and represents the conditions at the final extent. Sample AOC2-05 was considered a primary confirmation sample for data usability, but was not used to represent final conditions in text, tables, and figures.</p> <p>As discussed in paragraph two of Section 3.4.6 AOC 5 (page 3-8), sample AOC5-022 was collected from the initial excavation extent prior to limited over-excavation. Sample AOC5-035 was collected after the over-excavation to represent the conditions at the final excavation extent. Sample AOC5-022 was considered a primary confirmation sample for data usability, but was not used to represent final conditions in text, tables, and figures.</p>
Specific Comment 2	Section 4.0 Findings and Recommendations page 4-3	As stated, MEC verification and clearance will be completed at Site 11 to address any potential associated risks. Please indicate when this action will be completed.	Final planning documents were submitted in June 2005 to complete the MEC verification and clearance activities at all MEC sites, including IRP Site 11. MEC verification and clearance work was initiated at IRP Site 11 in September 2005 following the completion of the removal action. As a result of contracting issues, completion of the MEC verification and clearance work was delayed. A schedule to complete the work will be developed.
General Comment 1		<p>Based on our review of the data presented in the report, the Department concurs that the six AOC's within Site 11 have been adequately characterized and remediated below industrial PRG's. However no analysis of the data was compared to unrestricted PRG's. Please include a column in Table 2, and a descriptive analysis in Section 4.0, doing so.</p> <p>If the sites have been remediated below residential PRG's, a No Further Action decision can be supported and would not require Land Use Covenants as part of a remedy.</p>	<p>Residential PRGs were added to Tables 2 through 7 to determine if remaining concentrations in soil at IRP Site 11 allow for unrestricted use of the site. The text (Sections 3.5 and 4.0) was revised to indicate that an evaluation of unrestricted use of the property was conducted and to provide the results of the evaluation.</p> <p>The data indicates that No Further Action is required for the proposed future use and unrestricted use of the Site.</p>

**Response to Comments on the Draft Removal Action Report, Non-Time Critical Removal Action, Installation Restoration Program Site 11, NASA Crows Landing Flight Facility, Crows Landing, California
Originally Published March 8, 2006 as Document Control Number 9785**

Comments by: Russell W, Walls, Senior Engineer, California Regional Water Quality Control Board, Central Valley Branch, dated March 22, 2006			
Comment No.	Section, Figure, Table	Comment	Response
		Based on the data presented in the draft report, it would appear that the waste and associated impacted soil at each of the six AOC has been adequately characterized and remediated. As such, we concur that no further investigation/remediation regarding the six AOC is needed, and that the levels of petroleum hydrocarbon remaining in the soil pose a minimal risk. Further, we agree that the remaining MEC verification and clearance should be completed at Site 11.	Concurrence noted. The MEC verification and clearance work at IRP Site 11 was initiated in September 2005.
		Our only question regarding the report is as follows: What was the final disposition of the MEC removed from Site 11? Appropriate documentation for the MEC disposal should be provided.	As discussed in paragraph 4 of Section 3.6, the MEC scrap recovered from Site 11 was consolidated with MEC scrap from MEC verification and clearance activities and disposed of in accordance with the MEC Verification and Clearance Project Plans (Shaw, 2005c). The final disposition of the material will be discussed in the After Action Report for IRP Site 11.