



Dan Skopec
Acting Secretary
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Department of Toxic Substances Control

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N60211_000674
CROWS LANDING
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

May 11, 2006

Mr. Michael Bloom
Department of the Navy
Base Realignment and Closure
Program Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310

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

Dear Mr. Bloom:

Thank you for the opportunity to review the above referenced report which summarizes the field implementation of a non-time critical removal action at Installation Restoration Program (IRP) Site 11. Consistent with the Final Action Memorandum and Final Project Plans, the goal of the removal action was to "mitigate the exposure risk to the public health, welfare, or the environment posed by the waste at the site, based on the presence of potentially hazardous substances and Munitions and Explosives of Concern (MEC) related materials in the buried debris." To meet this objective, six Areas of Concern (AOC) within Site 11 required inclusion in the removal action and were addressed accordingly.

In summary, 143 soil confirmation samples were collected from the six AOC's within Site 11 and were analyzed for Total Petroleum Hydrocarbon, Volatile Organic Compounds (VOC), Semi (VOCs), metals, explosives and perchlorate. Consequently, 13,240 tons of non hazardous waste material and soil were removed from the site and disposed of in an appropriate landfill. The report provides a detailed description of the analytical results which indicate the contaminants of concern were not present at levels above industrial Preliminary Remediation Goals (PRGs).

Mr. Michael Bloom
May 11, 2006
Page 2

Specific Comments:

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.
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.

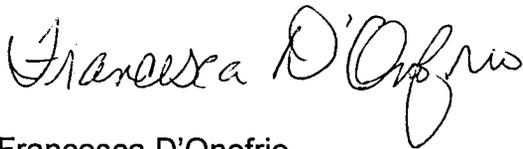
General Comments:

1. 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.

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.

If you have any questions regarding this letter, please contact me at (916) 255-3603 or FDonofri@dtsc.ca.gov.

Sincerely,



Francesca D'Onofrio
Hazardous Substances Scientist
Office of Military Facilities

cc: Greg Issinghoff
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