



Terry Tamminen  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

8800 Cal Center Drive  
Sacramento, California 95826-3200

N60211\_000616  
CROWS LANDING  
SSIC NO. 5090.3.A



Arnold Schwarzenegger  
Governor

December 17, 2004

Mr. Michael Bloom  
BRAC Environmental Coordinator  
Naval Facilities Engineering Command  
Southwest Division  
1220 Pacific Highway  
San Diego, California 92132-5190

**DRAFT PROJECT PLANS, DRAFT ENGINEERING EVALUATION/COST ANALYSIS,  
NON-TIME CRITICAL REMOVAL ACTION, INSTALLATION RESTORATION  
PROGRAM SITE 11, NASA CROWS LANDING FLIGHT FACILITY, CROWS  
LANDING, CALIFORNIA**

Dear Mr. Bloom:

As previously conveyed to you via e-mail, below are comments provided by the Department of Toxic Substances Control (DTSC) which should be incorporated into the final revisions of the above referenced documents:

- 1) Where appropriate, please reference the California Natural Diversity Database, Department of Fish and Game, which DTSC researched to determine that the project (removal action) will not have any impact on biological resources such as special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. (A copy of the Database was previously faxed to you for your files).
- 2) Under sections pertaining to Air Quality and associated dust measure controls, please state that pursuant to discussions with DTSC, "the project will comply with the San Joaquin Air Pollution Control District Regulation VIII".
- 3) In order to address any potential concerns with the removal and disposal of regulated asbestos, please add the following language: "If regulated asbestos (building waste, concrete floor tile, etc.) is removed from the site AND exceeds 35 cubic feet, then a courtesy notification will be provided to the ARB via notification to DTSC". Also note: If regulated asbestos is uncovered, the

appropriate control measures would be to stop work, isolate the material and keep it wet and covered.

- 4) Please stress in written summary in the Site Description sections that Site 11 is located within the former industrial portion of the base and is not/was not used for agricultural production.
- 5) Regarding the impact the project will have on local traffic patterns, in order to address any potential concerns, please add the following language to the document(s): "Pursuant to the Stanislaus County Public Works Department, the project will not impact the level of service for the county's transportation plan".

For the sections addressing potential unexploded ordnance (UXO), please also include the following comments:

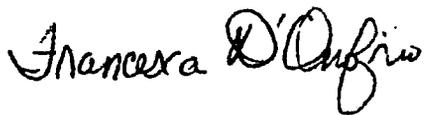
- 1) Terminology. The documents use the terms *unexploded ordnance (UXO)*, *ordnance and explosives (OE)*, and *munitions and explosives of concern (MEC)* without defining. Please provide definitions and edit document to ensure consistent use of terms.
- 2) Please consistently clarify whether the pit that was noted to have received "Approximately 300 pounds of the metal debris, collected from two nearby practice bombing ranges", also received other waste materials.
- 3) The text correctly states- "...OE [ordnance and explosives] waste could be considered RCRA hazardous waste...". However, there is no discussion regarding compliance with RCRA treatment criteria. Specifically, treatment of OE waste recovered during excavation is a regulated activity. Compliance with California Code of Regulations Section 66264.600 is therefore mandatory. The text should be modified to include a discussion on how such compliance will be maintained. Text should state that the work plan meets the substantive requirements of Title 22 of the California Code of Regulations for treatment of reactive waste.
- 4) As part of the modification required per comment #3 above, sampling of soils before and after detonation of OE must be performed. Soils should be analyzed for metals, explosives and perchlorates.
- 5) The Explosive Safety Submission was submitted unsigned. Signoff by the Senior UXO Safety Officer (SUXSO), Responsible Professional and the Department of

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Defense Explosive Safety Board (DDESB) should be achieved prior to initiating field work.

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

Sincerely,

A handwritten signature in black ink that reads "Francesca D'Onofrio". The signature is written in a cursive style with a large, stylized "F" and "D".

Francesca D'Onofrio  
Hazardous Substances Scientist  
Office of Military Facilities