



Linda S. Adams  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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N60211\_000691  
CROWS LANDING  
SSIC NO. 5090.3.A



Arnold Schwarzenegger  
Governor

November 13, 2006

Mr. James Sullivan  
BRAC Environmental Coordinator  
Department of the Navy  
Program Management Office West  
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**DRAFT PROJECT WORKPLAN, MUNITIONS AND EXPLOSIVES OF CONCERN  
VERIFICATION AND CLEARANCE AT INSTALLATION RESTORATION SITES 11,  
11B AND B; AND REMOVAL ACTION AT INSTALLATION RESTORATION SITE 11B  
AT NATIONAL AERONAUTICS AND SPACE ADMINISTRATION FLIGHT FACILITY  
CROWS LANDING, CROWS LANDING, CALIFORNIA**

Dear Mr. Sullivan:

Thank you for the opportunity to review the above referenced document which was prepared by TETRA TECH EC, INC., on behalf of the United States Department of the Navy. The document presents the design criteria for the investigation and clearance of MEC (munitions and explosives of concern) at Sites 11 and B. It also includes a proposed removal action at Installation Restoration Program (IRP) Site 11B to eliminate buried debris that may contain MPPEH (material potentially presenting an explosive hazard).

The Department of Toxic Substances Control (DTSC) concludes the document meets the objectives listed above. However, before finalizing the draft workplan, please address the following comments:

1. Action levels for confirmation soil samples from IRP Site 11B will be based on EPA Region 9's Industrial Preliminary Remediation Goals (PRG's). However, DTSC recommends comparing the soil samples to Residential PRG's. Based on site environmental conditions, soil samples may be found to meet Residential PRG standards. If so, the sampling results would support a finding that the property is suitable for unrestricted reuse and land use restrictions would not be required on the property.

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2. Section 1.0, Introduction, Page 1-1. The text states the United States Environmental Protection Agency (U.S. EPA) provides oversight on the clean-up activities at the Facility. Please delete this sentence as U.S. EPA is not involved in oversight or review of environmental documents at the Crows Landing facility.
3. Section 3.4, IRP Site 11 Intrusive Investigation, Page 3-5: This section describes the procedures to be used for reacquisition of geophysical targets. As indicated, the Vallon VMX metal detector will be used by the Unexploded Ordnance technician. While the Vallon detector may be appropriate, the text does not include a description on how this instrument will be checked and validated to confirm it meets detection capabilities. Therefore, a description on the procedure used to confirm equipment performance capabilities via the geophysical prove out would be helpful.
4. Section 5.3, Personnel, Page 5-2: The text states "The geophysical and position data will be processed and interpreted by a degreed geophysicist." However, the California Geologist and Geophysicist Act, Business and Professions Code, Chapter 12.5, Article 7835 requires the submittal of reports which interpret geophysical data be signed by a California licensed geophysicist. Having a degreed geophysicist does not meet the specifications of the Business and Professions Code. Please address accordingly.

If you have any questions regarding these comments, please contact me at (916) 255-3603 or [FDonofri@dtsc.ca.gov](mailto:FDonofri@dtsc.ca.gov).

Sincerely,



Francesca D'Onofrio  
Hazardous Substances Scientist  
Office of Military Facilities

cc: (see next page.)

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cc: Mr. Greg Issinghoff  
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