

Agency

N60211\_000692  
CROWS LANDING  
SSIC NO. 5090.3.A



Arnold Schwarzenegger  
Governor



# Department of Toxic Substances Control

Maureen F. Gorsen, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



Linda S. Adams  
Secretary for  
Environmental Protection

December 5, 2006

Mr. James Sullivan  
BRAC Environmental Coordinator  
Department of the Navy  
Program Management Office West  
1455 Frazee Road, Suite 900  
San Diego, California 92106-4310

**DRAFT ACTION MEMORANDUM (AM), COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, & LIABILITY ACT, TIME-CRITICAL REMOVAL ACTION (TCRA), INSTALLATION RESTORATION PROGRAM (IRP) SITE 11B AT NATIONAL AERONAUTICS AND SPACE ADMINISTRATION CROWS LANDING FLIGHT FACILITY, CROWS LANDING, CALIFORNIA**

Dear Mr. Sullivan:

Thank you for the opportunity to review the above referenced document which was prepared to outline the DON's decision to implement a TCRA at IRP Site 11B. Operational site history, as well as previous investigative data, indicates IRP Site 11B may contain material potentially presenting an explosive hazard. As such, the removal action is being conducted to eliminate and abate any potential hazards associated with Munitions and Explosives of Concern, Munitions Debris and Munitions Constituents. In addition, the proposed action will include soil analysis (and appropriate disposal) for lead, polycyclic aromatic hydrocarbons and total petroleum hydrocarbons.

The Department of Toxic Substances Control (DTSC), concludes the AM is well written and meets the objective stated above. However, before finalizing the draft AM, please consider the following comment. The comment was included in our letter, dated November 23, 2006, on the draft MEC workplan for Sites 11, 11B and B and is also applicable to the draft AM:

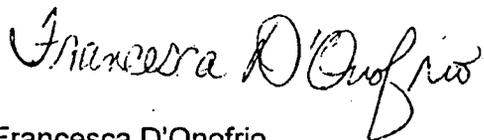
Action levels for confirmation soil samples from IRP Site 11B will be based on United States Environmental Protection Agency Region IX's Industrial Preliminary Remediation Goal (PRG's). However, DTSC recommends comparing the soil samples to Residential PRG's. Based on site environmental conditions, soil

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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.

If you have any questions regarding this letter or any issue related to the proposed removal action, 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

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