



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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N60211_000702
CROWS LANDING
SSIC NO. 5090.3.A

5090
Ser BPMOW.JK/0222
December 22, 2006

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

**SUBJECT: RESPONSES TO COMMENTS ON DRAFT PROJECT WORK PLAN
MEC VERIFICATION AND CLEARANCE AT IR SITES 11 AND 11B AND
SITE B AND DRAFT ACTION MEMORANDUM CERCLA TIME-CRITICAL
REMOVAL ACTION SITE 11B NASA FLIGHT FACILITY CROWS
LANDING, CROWS LANDING, CALIFORNIA, DECEMBER 22, 2006**

Dear Ms. D'Onofrio:

Enclosed are the proposed responses to comments for the two subject documents. Comments were received from the California Department of Toxic Substances Control. The Regional Water Quality Control Board Central Valley Region, Stanislaus County, and NASA Ames Research Center had no comments on the two documents.

We look forward to resolving these comments and finalizing the MEC Work Plan and Site 11B Action Memorandum in early January 2007. If you have any questions, please call me at (619) 532-0966 or the Lead Remedial Project Manager Mr. John Kowalczyk at (619) 532-0972.

Sincerely,

JAMES B. SULLIVAN
BRAC Environmental Coordinator
By direction of the Director

Enclosure: 1. Responses to Comments to Draft Project Work Plan for Munitions and Explosives of Concern Verification and Clearance at IR Sites 11 and 11B and Site B and Draft Action Memorandum CERCLA Time-Critical Removal Action Site 11B at NASA Flight Facility Crows Landing, Crows Landing, California, December 22, 2006

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Copy to:
Mr. Greg Issinghoff
California Regional Water Quality Control Board
Central Valley Region, Fresno Office
1685 E Street
Fresno, CA 93706-2020

Mr. Alan Berry
California Integrated Waste Management Board
Closure and Technical Services
1001 I Street, (Mail Stop 20)
Sacramento, CA 95812-4025

Mr. Don Chuck
NASA Ames Research Center
Office of Environmental Services
M/S 218-1
Moffett Field, California 94035-1000

Mr. Keith Boggs
Stanislaus County, Chief Executive Office
1010 Tenth Street, Suite 6800
Modesto, CA 95354

Mr. Kirk Ford
Stanislaus County Planning and Community Development
1010 Tenth Street, Suite 3400
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Ms. Nicole Damin
Stanislaus County
Hazardous Materials Division
Department of Environmental Resources
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**RESPONSE TO BRAC CLEANUP TEAM (BCT) COMMENTS ON
DRAFT PROJECT WORK PLAN
Dated September 22, 2006
MUNITIONS AND EXPLOSIVES OF CONCERN VERIFICATION AND CLEARANCE
AT INSTALLATION RESTORATION SITES 11 AND 11B, AND SITE B;
AND REMOVAL ACTION AT INSTALLATION RESTORATION SITE 11B AT NATIONAL AERONAUTICS AND SPACE
ADMINISTRATION FLIGHT FACILITY CROWS LANDING,
CROWS LANDING, CALIFORNIA**

DCN: ECS-D-RACIV-07-0058

December 22, 2006

Ms. Francesca D'Onofrio
Hazardous Substances Scientist
California Department of Toxic Substances Control
Office of Military Facilities
8800 Cal Center Drive
Sacramento, California 95826-3200

Response by:
Tetra Tech EC, Inc.
1940 E. Deere Avenue, Suite 200
Santa Ana, CA 92705

Comments: November 30, 2006

Response: December 22, 2006

Specific Comments on Draft Project Work Plan (Ms. Francesca D'Onofrio)

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

Response 1. Comment noted. As requested, chemical analyses results for confirmation soil samples to be collected from Area 1 of Site 11B and from soil screening results from Sites 11, 11B, and B will be compared to residential PRGs. Efforts will be made to segregate soils exceeding residential PRGs in the field if practical and feasible. It should be noted that the objective for MEC clearance throughout the sites is to meet the established future reuse -- industrial, agricultural, and aviation by clearance to a limited depth. Therefore, even if residential PRGs are met, land use restrictions may still be necessary at deeper depths.

Comment 2. Section 1.0, Introduction, Page 1-1. The text 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.

Response 2. Comment noted. The text in Section 1.0, Introduction, Page 1-1, stating: "Environmental Protection Agency (U.S. EPA) provides oversight on the clean-up activities at the Facility" will be deleted from in Final version of the document.

Comment 3. Section 3.4, IRP Site 11 Intrusive Investigation, Page 3-5: This section describes the procedures to be used for

Response 3. Comment noted. In Section 3.4, page 3-5, the following paragraph will be added after the second paragraph: "A functionality test of the Vallon

**RESPONSE TO BRAC CLEANUP TEAM (BCT) COMMENTS ON
DRAFT PROJECT WORK PLAN**

Dated September 22, 2006

**MUNITIONS AND EXPLOSIVES OF CONCERN VERIFICATION AND CLEARANCE
AT INSTALLATION RESTORATION SITES 11 AND 11B, AND SITE B;
AND REMOVAL ACTION AT INSTALLATION RESTORATION SITE 11B AT NATIONAL AERONAUTICS AND SPACE
ADMINISTRATION FLIGHT FACILITY CROWS LANDING,
CROWS LANDING, CALIFORNIA**

DCN: ECSD-RACIV-07-0058

December 22, 2006

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.

metal detectors will be conducted when the instruments are first received, and daily before the work day begins. The detectors will be passed over metal objects that will be buried in known locations. The test bed that will be installed for the Validation of Detection Systems (VDS) may be used for the daily tests. The text will be amended to reflect these procedures.”

Comment 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 Professional 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 Professional Code. Please address accordingly.

Response 4. Comment noted. In Section 5.3 on page 5-2, the last sentence of the first paragraph will be deleted and replaced with the following text: “A geophysicist licensed in California will provide oversight on the collection and interpretation of geophysical data that will be collected at the project sites. The California-licensed geophysicist will observe the VDS and data collection process and will review the processed geophysical data. The California-licensed geophysicist will also review the final report and affix his/her signature to the final report before it is submitted to the Navy and the regulatory agencies.”

**RESPONSE TO BRAC CLEANUP TEAM (BCT) COMMENTS ON
DRAFT ACTION MEMORANDUM
Dated October 13, 2006**

**CERCLA TIME-CRITICAL REMOVAL ACTION AT IR SITE 11B
AT NASA FLIGHT FACILITY CROWS LANDING, CROWS LANDING, CALIFORNIA**

DCN: ECSD-RACIV-07-0057

December 22, 2006

Ms. Francesca D'Onofrio
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California Department of Toxic Substances Control
Office of Military Facilities
8800 Cal Center Drive
Sacramento, California 95826-3200

Response by:
Tetra Tech EC, Inc.
1940 E. Deere Avenue, Suite 200
Santa Ana, CA 92705-5718

Comments: December 5, 2006

Response: December 22, 2006

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

Response 1. Comment noted. In Section 5.1.5, the following will be added to the end of the second paragraph: "Chemical analyses results for confirmation soil samples to be collected from Area 1 of Site 11B and from screened soil will be compared to residential PRGs. Efforts will be made to segregate soils exceeding residential PRGs if practical and feasible."

In addition, in Section 5.2, on page 5-4, the following will be deleted from the last paragraph: "Following implementation of this removal action, the land use would be unrestricted."

The paragraph will be revised to read: "The objectives for MEC clearance is to meet the established future reuse -- industrial, agricultural, and aviation by clearance to a limited depth. The proposed removal action at IRP Site 11B is anticipated to complete cleanup to the specified cleanup goals and to meet the above objectives, and will serve as the final remedy."

