

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

N00296.002832

MOFFETT FIELD

SSIC NO. 5090.3

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2

700 HEINZ AVE., SUITE 200

BERKELEY, CA 94710-2737



April 30, 1996

Commander  
Department of the Navy  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
Attn: Mr. Stephen Chao, Project Manager  
900 Commodore Drive, Bldg. 101  
San Bruno, California 94066-2402

Dear Mr. Chao:

**THE DRAFT RECORD OF DECISION (ROD), OPERABLE UNIT-1, MOFFETT  
FEDERAL AIRFIELD**

The Department of Toxic Substances Control (DTSC), the San Francisco Regional Water Quality Control Board (RWQCB) and the California Integrated Waste Management Board (CIWMB) have reviewed the subject document and prepared following comments for your consideration. If you have any questions, please contact me at (510) 540-3830 to ensure a coordinated approach for all regulatory comments.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Joseph Chou".

C. Joseph Chou  
Remedial Project Manager  
Base Closure Unit  
Office of Military Facilities

**Enclosures**

cc: Mr. Michael Rochette  
Regional Water Quality Control Board  
2101 Webster Street, Suite 500  
Oakland, California 94612

Mr. Michael D. Gill  
U.S. Environmental Protection Agency  
Region IX, Mail Stop H-9-2  
75 Hawthorne St.  
San Francisco, California 94105

AK

2832

Mr. Stephen Chao  
April 30, 1996  
Page 2

Ms. Sandy Olliges  
Assistant chief  
Safety, Health and Environmental Services  
National Aeronautics and Space Administration  
Ames Research Center  
Moffett Field, CA 94035-1000

Mr. Peter Strauss  
MHB Technical Associates  
1723 Hamilton Avenue, Suite K  
San Jose CA 95125

Mr. James McClure, Ph.D.  
Harding Lawson Associates  
105 Digital Drive  
Novato, California 94949

Mr. Ramon Perez, Esq.  
Department of Toxic Substances control  
400 P Street, 4th Floor  
P.O. Box 806  
Sacramento, California 95812-0806

Diane Nordstrom  
California Integrated Waste Management Board  
8800 Cal Center Drive  
Sacramento, California 95826

Mr. Stephen Chao  
April 30, 1996  
Page 3

#### GENERAL COMMENTS

1. Please include a statement in the main body of the ROD regarding the need to continue to operate the Building 191 pumping station. Without continuing operation of the pumping station, flooding of Sites 1 and 2 is likely which would cause the need for more extensive remedial work.
2. In the main body of the document, it should be clearly stated that further groundwater investigation and radiological survey will be conducted and the results be considered in the Remedial Design documents.
3. Pursuant to Section 32.1 of the Federal Facility Agreement (FFA), Navy shall seek sufficient funding through the Department of Defense (DoD) budgetary process to fulfill its environmental cleanup obligations at Moffett Field. If appropriated funds are not available to fulfill the Navy's obligation under the FFA, the State reserves the right to initiate an action against the Navy, or to take any action, which would be appropriate absent the agreement.

#### SPECIFIC COMMENTS

1. Page 2, Description of the Selected Remedy

The closure and postclosure requirements of Title 23 of the California Code of Regulations (CCR), which were listed in the Final OUI Feasibility Study Report, should be included in the "Description of the Selected Remedy" section.

2. Page 2, Description of the Selected Remedy

Please specify the "institution controls" mentioned in this paragraph.

3. Page 11, 5th Paragraph; Section 2.4

Please explain how the response action will seal off Sites 1 and 2 as sources to groundwater contamination. To our understanding, containment actions may only isolate the landfill refuse, minimize disturbances to the landfill surface, and reduce off-site surface contaminant migration into the nearby wetlands.

Mr. Stephen Chao  
April 30, 1996  
Page 4

4. Page 12, 1st Paragraph; Section 2.4

Only 19 sites, not 24 sites, were mentioned in Section 2.2. All the Station-wide sites were not discussed in Section 2.2.

5. Page 12, 2nd Paragraph; Section 2.4

Please clarify what is the current installation management strategy. Since Moffett Federal Airfield (Formerly Naval Air Station Moffett Field) has been transferred to NASA in July 1994. Therefore, the statement of identifying parcels and the no-action ROD does not apply to Moffett Field.

6. Page 12, 3rd Paragraph; Section 2.5

Please provide a citation of the statement "The NCP contains the expectation that engineering controls...where treatment is impracticable".

7. Page 15, 2nd Paragraph; Section 2.5.2

Please clarify if a security fence will be built (or has been built) to prevent any illegal dumping at Site 2.

8. Page 19, 2nd and 3rd Paragraphs; Section 2.6.2

The Department disagree with the statement that groundwater off-site migration exposure pathway is incomplete. Additionally, the third paragraph is confusing, please explain why the ecological assessment was streamlined because of the incomplete exposure pathways.

9. Page 20, 2nd Paragraph; Section 2.6.2

Please refer to the letter from DTSC dated June 22, 1995. In the attachment, the California Department of Fish and Game (DFG) recommended that a redelineation of wetland resources using Cowardin (1979) recognition criteria should be conducted. In addition, the removal of wetlands at the landfill be offset such that no net loss of wither wetland acreage or wetland habitat value would result from proposed remedial action.

**COMMENTS ON RESPONSIVENESS SUMMARY**

1. Page 53, Comment 8

At the end of 30 years of postclosure maintenance, the Navy should demonstrate to the satisfaction of the State of

Mr. Stephen Chao  
April 30, 1996  
Page 5

California which includes the Department of Toxic Substances Control and Regional Water Quality Control Board.

2. Page 56, Comment 22

Please clarify if dioxins will be analyzed in future sampling activities.

**Prepared By:** Michael Bessette Rochette

**Phone No.:** (510) 286-1028

**Date:** April 22, 1996

**File No.:** 2189.8009(MMBR)

**Subject:** Operable Unit 1, Draft Record of Decision, Moffett Federal Airfield

**General Comments:**

- 1) Without the completion of the Site Wide Ecological Assessment, what is the basis for the determination that the selected remedy is protective of the environment?
- 2) Because of the affect of the pumping operations at Building 191 with respect to future land use and site-wide groundwater flow, how does the Navy propose to address the public and agency concerns regarding the continued operations at Building 191?
- 3) Please include a schedule that will address anticipated funding limitations.

**Specific Comments:**

- 4) **Page 3, Statutory Determinations:** Please provide supporting text for the evaluation that the selected remedy is protective of the environment.
- 5) **Page 3, Statutory Determinations:** Please correct the spelling of the RWQCB Executive Officer to Loretta K. Barsamian.
- 6) **Page 20, Sec. 2.6.2, 2nd par.:** Please state how the Navy is planning to respond to the recommendation by the U.S. Fish and Wildlife Service to prepare a wetland mitigation plan. Please incorporate the plan into the ROD and the RD/RA.
- 7) **Page 21, Sec. 2.6.2, 3rd par.:** Has a contingency plan been evaluated if the Nationwide Permit is denied?

Concurred by: \_\_\_\_\_

*Ron Gervason*

Ron Gervason, DOD Section Leader

Date: \_\_\_\_\_

*4/29/96*

# State ARARs for Solid Waste Disposal Site Closure and Postclosure Maintenance

Source	Standard, Requirement, Criterion, or Limitation	ARAR Status	Description	Comment	Associated Site
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17766 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Emergency Response Plan (ERP): potential emergency conditions that may exceed the design of the site and could endanger the public health or environment must be anticipated. Response procedures for these conditions must be addressed in the RD/RA plans.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17767 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Security at Closed Sites: all points of access to the site must be restricted, except permitted entry points. All monitoring, control, and recovery systems shall be protected from unauthorized access.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17773 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Final Cover: the design and construction of the final cover must meet specific prescriptive standards of 23 CCR 2581(a). These include minimum thickness and quality of the construction material. If the prescriptive standard is not feasible then an engineered alternative that meets the performance goals (i.e. limiting infiltration, controlling gas emissions, compatibility with reuse) can be proposed.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17774 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Construction Quality Assurance (CQA): a CQA program must be designed and implemented. It must include specific parameters (and for some components specific testing methods) for each component of the final cover.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17776 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Final Grades: the final grades for the covered landfill must meet grading standards provided in 23 CCR 2581, they must be appropriate to control runoff and erosion.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites

# State ARARs for Solid Waste Disposal Site Closure and Postclosure Maintenance

Source	Standard, Requirement, Criterion, or Limitation	ARAR Status	Description	Comment	Associated Site
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17777 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Final Site Face: the design of the final site face must provide for the integrity of the final cover both under static and dynamic conditions.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17778 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Final Drainage: the design of the final cover must control runoff and runoff produced by a 100 year 24 hour storm event and must be prepared according to CQA requirements.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17779 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Slope Protection and Erosion Control: the design and construction of the slopes must protect the integrity of the final cover and minimize soil erosion.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17781 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Leachate Control During Closure and Post Closure: leachate must be monitored, collected, treated, and discarded appropriately.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760. The state does not intend that subsurface leachate monitoring and collecting systems need to be added to existing landfills unless leachate production and/or accumulation is evident.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17783 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Gas Monitoring and Control During Closure and Post Closure: landfill gases must be collected and analyzed; the concentration of combustible gas at the landfill boundary must be 5% or less, trace gases must not be at levels that cause adverse health or environmental impacts.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites

# State ARARs for Solid Waste Disposal Site Closure and Postclosure Maintenance

Source	Standard, Requirement, Criterion, or Limitation	ARAR Status	Description	Comment	Associated Site
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17788 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Post Closure Maintenance: the landfill must be maintained and monitored for no less than 30 years following closure.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43020	14 CCR 17796 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable	Post Closure Land Use: Site Closure Design shall show one or more proposed uses of the closed site or show development that is compatible with open space. Changes in postclosure land use must be approved by the appropriate State agency prior to implementation.	Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43509	14 CCR 18262.3 Chapter 5, Article 3.4 Closure and Postclosure Maintenance Plans	Relevant and Appropriate	Provides the content requirements for closure plans for solid waste disposal sites.	Applies to solid waste disposal sites that received waste after January 1, 1988.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43509	14 CCR 18265.3 Chapter 5, Article 3.4 Closure and Postclosure Maintenance Plans	Relevant and Appropriate	Provides the content requirements for postclosure maintenance plans for solid waste disposal sites.	Applies to solid waste disposal sites that received waste after January 1, 1988.	For closing sites
California Integrated Waste Management Act of 1989 PRC 40502 & 43509	14 CCR 18275 Chapter 5, Article 3.4 Postclosure Maintenance Plans	Relevant and Appropriate	Provides the content requirements to obtain <u>certification</u> that the solid waste disposal sites has closed pursuant to state standards.	Applies to solid waste disposal sites that received waste after January 1, 1988.	For closing sites

14 CCR - California Code of Regulations, Title 14

ARAR - applicable or relevant and appropriate requirement    ROD - Record of Decision    RD/RA - remedial design/remedial action