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Ser 1843.1/5130
July 26, 1995

Dear RAB Member:

On behalf of Moffett Federal Airfield (MFA) Base Closure Team and the Community Co-Chair,

I would like to invite you to our eighth Restoration Advisory Board (RAB) meeting.

Our last RAB meeting was held on July 13, 1995 at the Mountain View Police/Fire Auditorium in Mountain View, CA. The meeting summary is provided as enclosure (1). Our **next RAB meeting** will again be held on the second thursday of the month, **August 10, 1995**, at the **Mountain View Police/Fire Auditorium**. The meeting will begin promptly at **7:00 p.m.** The agenda for the meeting is as follows:

7:00-7:02 PM Meeting Overview
7:02-7:04 PM Minutes Approval
7:04-7:10 PM Remedial Project Managers Meeting Report
7:10-7:15 PM EPA / MEW Meeting Report
7:15-7:25 PM Subcommittee Reports
7:25-7:55 PM T.H.E. Committee Presentation of OU1
7:55-8:10 PM Michael Bessette - Regulatory Framework Update
8:10-8:40 PM OU1 Open Discussion
8:40-8:58 PM OU5 Update
8:58-9:00 PM Agenda/Schedule for September RAB Meeting

A copy of the T.H.E. Committee presentation summary is forwarded as enclosure (2) for your review. If you have any questions or comments, please contact me at (415) 244-2563, Mr. Hubert Chan of this office at (415) 244-2562, or Mr. Paul Lesti, Moffett's Community Co-Chair, at (415) 969-7682.

Sincerely,
Original signed by:

STEPHEN CHAO
BRAC Environmental Coordinator,
Moffett Federal Airfield

Distribution:
Moffett Federal Airfield RAB Members

Distribution:

Elizabeth	Adams	Robin	Parker
Bernie	Album	Stephen	Schneider
Maurice	Ancher	Richard	Schuster
John	Beck	Christina	Scott
Rick	Bernardi	Molly	Sellman
Charles	Berrey	Lenny	Siegel
Michael	Bessette	Cynthia	Sievers
Anne	Blakeslee	Ted	Smith
Dena	Bonnell	Steve	Sprugasci
Jim	Burgard	Ron	Staricha
Steve	Chin	Peter	Strauss
Diane	Cho	Robert	Strena
Joseph	Chou	Bob	Such
Ann	Coombs	Joseph	Trudel
Robert	Davis	Julio	Valera
Chris	DeGroot	Mary	Vrable
John	Durichek	Patricia	Wood
Russ	Frazer	John	Young
John	Gibbs		
Michael	Gill		
David	Glick		
John	Gurley		
Jim	Haas		
Rita	Halper		
Thomas	Harney		
Roger	Higdon		
Bob	Holston		
Thomas	Iwamura		
Susan	Jun		
Albert	Keicher		
Isao	Kobashi		
Byron	Leigh		
Paul	Lesti		
Stan	Lundgaard		
Michael	Martin		
James	McClure		
Stewart	McGee		
Jacklyn	Montgomery		
Bob	Moss		
Sandra	Olliges		
Edwin	Pabst		

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184, 1843, 1843.1, 1843.2, 1843.3, 09CMN, 61.2

PRC Environmental Management Inc. (Attn: Michael Young)

Montgomery Watson (Attn: Chris Peterson)

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MEETING MINUTES{PRIVATE }
MOFFETT FEDERAL AIRFIELD
RESTORATION ADVISORY BOARD MEETING
JULY 13, 1995 7:00 p.m.
MOUNTAIN VIEW POLICE AND FIRE AUDITORIUM

Mr. Michael Young, PRC Environmental Management, Inc. (PRC) (consultant to the Navy) opened the meeting of the Moffett Federal Airfield (Moffett Field) restoration advisory board (RAB) by reviewing the agenda. The agenda for this meeting included the following:

- Minutes approval
- Remedial project managers' (RPM) meeting report
- Committee reports
- RAB bylaws review status
- Team building and buddy system
- Presentation of regulatory framework for operable unit (OU) 1
- Questions and answers on presentation
- OU1 open discussion
- Agenda and schedule for next meeting

Minutes Approval

Mr. David Glick, Geoplexus and community vice co-chair, solicited comments on the minutes of the previous meeting. There were no comments and the minutes were accepted by voice vote.

RPM Meeting Report

Mr. Michael Gill, U.S. Environmental Protection Agency (EPA), summarized the Moffett Field RPM meeting held on July 12, 1995. Mr. Gill presented recent field activities and documents discussed during the RPM meeting, including the following:

Site 5 Bioventing Pilot Test

The Navy will conduct a construction completion inspection on July 18, 1995. The pilot test is scheduled to begin in early August 1995 and continue for approximately 6 months.

Site 14 Recirculating In Situ Treatment (RIST) System Pilot Test

The Navy will conduct a construction completion inspection on July 18, 1995. The pilot test is scheduled to begin in mid-August 1995 and continue for approximately 3 to 6 months.

Site-wide Ecological Assessment (SWEA)

The Navy completed the remaining phase II field sampling during the week of June 19, 1995. Sampling included sweep net sampling for insects, pickleweed tissue sampling, earthworm sampling at the golf course, and soil vapor sampling in owl burrows. Phase II of the SWEA involves a quantitative analysis of the effects of chemicals on Moffett Field plants and animals.

Site 9 Source Control Measure

The Navy conducted an 8-hour test of the Building 45 treatment system to investigate the source of a high lead concentration (51 micrograms per liter [mg/L]) measured in a sample of the system effluent collected during system startup. Analysis of samples collected from the 8-hour test indicated much lower lead levels (no lead was detected at the 1.3 mg/L detection limit). Mr. Young added that the lead concentration in the effluent sample was greater than that in the influent sample during the initial startup and, therefore, the reliability of the initial sample results was in question. He stated that the Building 45 treatment system would be restarted and operated according to system startup procedures.

Wash Rack Field Work Plan Schedule

The wash rack is a former aircraft cleaning area south of Hangar 1. The Navy will investigate the potential for activities at this area to affect volatile organic compound (VOC) concentrations in groundwater within the regional plume that occurs beneath Moffett Field and the upgradient Middlefield-Ellis-Whisman (MEW) Superfund site. The Navy submitted the final work plan for the wash rack investigation to the regulatory agencies on July 3, 1995. Dr. James McClure, Harding Lawson Associates (consultant to the MEW companies), submitted comments on the final work plan and Mr. Gill stated that he had discussed several of the comments with the Navy at the RPM meeting. The comments discussed included:

1. Timing of data availability from the wash rack investigation with respect to EPA comments on the regional groundwater remediation system design being prepared by the MEW companies
2. Concurrent sharing of data among the Navy, regulatory agencies, and the MEW companies
3. Criteria for evaluating whether activities at the wash rack had affected the regional plume and the need to consider the hydrogeology of the area in addition to VOC concentrations measured during the investigation

Mr. Gill stated that EPA and the Navy would address these concerns during the field work and subsequent report preparation.

Station-wide Remedial Investigation (RI)

The Navy and the regulatory agencies will meet on July 28, 1995 to discuss the cumulative risk assessment.

OU5 Status and Schedule

The Navy and the regulatory agencies have had additional meetings to discuss remediation at OU5. The Navy plans to use an active remediation strategy for cleanup at OU5. The OU5 feasibility study (FS) report is being revised to address agency comments; the tentative date for the OU5 public meeting is October 12, 1995.

OU1 Status and Schedule

The record of decision (ROD) and remedial design and remedial action (RD/RA) work plan are the next documents to be prepared for OU1. The draft ROD is scheduled to be submitted on August 21, 1995 and will include responses to public comments.

National Aeronautics and Space Administration (NASA) Investigations Update

NASA has completed sampling and is preparing reports for investigations at various areas of interest. Some of the areas also overlie the regional VOC plume and NASA is coordinating with the Navy and the MEW companies on the design of the regional groundwater remediation system.

Mr. Gill concluded his presentation of the RPM meeting by stating that the next RPM meeting was scheduled for August 10, 1995.

Mr. Peter Strauss, MHB Technical Associates (consultant to the Silicon Valley Toxics Coalition [SVTC]), asked for additional details about the work at Site 14. Mr. Gill stated that Site 14 is located near the south gate at Moffett Field and that the work involved a removal action. Mr. Stephen Chao, U.S. Navy co-chair, added that a pump-and-treat system operated at Site 14 for approximately 1 year and that the RIST system was recently installed there.

Mr. Chao added that the California Integrated Waste Management Board (CIWMB) was assisting Mr. Joseph Chou, California EPA (CAL/EPA) Department of Toxic Substances Control (DTSC), in evaluating the Navy's proposed caps at OU1 and in assessing the consistency of the Navy's actions with respect to surrounding landfills. Mr. Chou stated that he expected to receive comments from CIWMB the following week. Mr. Chao noted that CIWMB had questions concerning the Navy's results from EPA's Hydrologic Evaluation of Landfill Performance (HELP) model. He indicated that the Navy was

working with CIWMB to resolve these technical issues. Mr. Gill added that the main concern was whether the proposed design was satisfactory.

Mr. Strauss asked what NASA's role was at the RPM meetings and why there was not more NASA presence. Mr. Chao responded that Ms. Sandy Olliges, NASA, would provide an update of NASA activities at the next RAB meeting. Mr. Gill added that NASA is not part of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) site and that Ms. Elizabeth Adams of EPA reviews documents prepared by NASA. Mr. Gill noted that he often consults Ms. Adams to maintain consistency between Navy and NASA activities. He stated that the regulatory agencies, Navy, and NASA also attend a meeting with the MEW companies each quarter. Ms. Leslie Byster, SVTC, asked for more information about these meetings. Mr. Gill responded that the meetings are for exchange of technical information. Dr. McClure added that representatives from companies working at the MEW site including Schlumberger Technology Corporation; Raytheon Company; Intel Corporation; NEC Electronics, Inc.; Siltec Corporation; General Instrument Corporation; Sobrato Development Companies; Tracor X-ray, Inc.; Union Carbide Corporation; and others attend the meetings. Mr. Chao stated that the Navy and the MEW companies also hold monthly coordination meetings.

Mr. Strauss requested that a report of the MEW quarterly meeting be presented to the RAB. Mr. Chao responded that the technical content of the MEW meetings is much less than that at the RAB meetings. He added that MEW status reports presented at the quarterly meetings are usually very brief. Mr. Strauss stated that a report of the MEW quarterly meeting would still be useful to the RAB. Mr. Chao suggested that Dr. McClure, as the MEW representative, could present the report. Mr. Gill noted that similar issues and activity reports are discussed in the MEW meetings as in the RPM meeting and indicated that he would provide the report to the RAB for the next quarterly MEW meeting.

Committee Reports

Mr. Glick introduced reports on activities of the following committees: (1) communications, media, and outreach; (2) technical, historical, and educational (THE); (3) cost; and (4) organizational.

Ms. Byster, Mr. Edwin Pabst, Los Altos resident, and Mr. Thomas Harney reported on activities of the communications, media, and outreach committee. Ms. Byster stated that the committee needed additional members to help with community outreach. She noted that the second fact sheet prepared by the committee would focus on OUI and that the THE committee was preparing information for the fact sheet. Mr. Pabst indicated that only four RAB members had volunteered to speak to the community. Ms. Byster added that community involvement is important and solicited additional members to volunteer as speakers.

Ms. Cynthia Sievers, Mountain View resident and League of Women Voters, asked who evaluates which members are capable of speaking to the community. Ms. Byster responded that all RAB members could be speakers. Ms. Sievers stated she believed that the RAB should control who presented RAB positions. Mr. Glick added that information to be presented could be summarized and reviewed and approved by the RAB co-chairs before it is given to the community. Ms. Byster commented that she did not know who would be appropriate reviewers.

Mr. Robert Strena stated that the community at large was more concerned over potential reuse of Moffett Field as a whole than about cleanup issues. He added that presentations to the community could focus on technical issues, but that speakers must be prepared to address reuse issues. Mr. Strena continued that the Mountain View community is very interested in Moffett Field reuse issues and that even the senators representing the area do not know the future use of the facility. He suggested that a statement describing issues to be discussed at a public meeting be prepared and published in local newspapers before the meeting rather than only advertising the meeting location and time. Mr. Chao responded that no additional advertisements were planned for OUI. Mr. Strena asked whether the Navy can assure residents that the Navy will always be present at Moffett Field. Mr. Chao responded that the Navy will continue to be responsible for cleanup at Moffett Field regardless of the location of Navy staff.

Mr. Robert Moss indicated that he had experience at a Superfund site in Palo Alto. He stated that it may be useful for the Navy to present areas of Moffett Field that are or are not acceptable for future residential use based on a baseline public health evaluation. This approach could provide constraints for

future reuse. Mr. Chao stated that the risk assessment for Moffett Field was still in progress but that such a presentation could be prepared when the risk assessment was completed.

Ms. Dena Bonnell, City of Mountain View, suggested that a series of broad position statements could be developed by a small committee and brought before the entire RAB for review and approval. Ms. Sievers stated that the communications, media, and outreach committee could prepare presentation materials describing the Superfund process, the purpose of the RAB, and the types of documents so that speakers could present overall views from the RAB. Mr. Strauss commented that the issue of who represents the RAB was important because all members have their own agendas and, therefore, some members may be uncomfortable with others speaking for them. He added that many unknowns still exist and there is a large volume of information to understand to be comfortable in presenting anything to the community. Mr. Strauss advised careful consideration before any position papers were prepared, especially within the communications, media, and outreach committee.

Mr. Harney stated that the focus of the committee was to develop contacts within the media and to solicit the media to cover events related to Moffett Field. He indicated that, for example, he had contacted the San Jose Mercury News to cover the recent field trip at Moffett Field. Mr. Harney asked whether anyone had read a story in the Mercury News about the field trip. Mr. Chao noted that the reporter on the trip appeared uninterested and had other deadlines to meet. Mr. Harney asked whether a photographer also was present. Mr. Chao indicated that a photographer did not accompany the reporter. Mr. Harney suggested that the Mountain View Voice be contacted and urged continued efforts to involve the media in Moffett Field activities.

Mr. Chao stated that any speaker could preface a presentation by indicating that, although the speaker could not answer questions for the Navy, he could relate his understanding of presentations, documents, and discussions at RAB meetings. Speakers also could provide general information about types of activities and Navy contacts for additional information. Mr. Robert Davis stated that community outreach was important and noted few public participants attended the OU1 public meeting. He commented that newspaper advertisements are useful, but that the public does not understand the importance of the public meetings and does not attend. Mr. Davis urged the RAB to generate additional

public interest. Mr. Chao added that this limited public interest contributed to Navy's decision to accept all applicants to the RAB. Mr. Gill reminded members that RAB meetings are open to the public and suggested members invite friends to the meetings. He indicated that one RAB member responsibility was to solicit public involvement.

Mr. Moss stated that presentations to the community initially would be limited to describing the RAB and its activities. He noted that RAB members should be thinking of conclusions, such as recommended technologies for cleanup, for future presentations. Mr. Moss added that many pathways were available for information distribution such as the Internet, public cable television, and representatives from other nearby cities.

Ms. Byster stated that the next communications, media, and outreach committee meeting was scheduled for August 3, 1995 at 7:00 p.m. at the Mountain View police and fire auditorium. Messrs. Pabst and Harney concurred with the meeting time. Mr. Pabst added that the community may want to know why the RAB was formed. Ms. Bonnell agreed that the purpose of the RAB needs to be explained in simple terms and that the general public has little understanding of technical issues. Dr. McClure suggested that Ms. Bonnell use any connections the Mountain View city council may have to solicit additional media coverage. He added that flexibility in decision making decreases as a ROD is finalized and that future land uses may be decided based on the ROD regardless of who takes over Moffett Field in the future. Dr. McClure noted that cleanup decisions will be made during the next year even if ownership issues remain outstanding.

Mr. Glick closed discussion of the communications, media, and outreach committee report and asked for the THE committee report. Dr. McClure suggested that the name of the committee be reduced to the technical committee. He reported that the committee met on June 14 and July 5, 1995 and was scheduled to meet again on July 19, 1995 to review the OUI remedy selection. Dr. McClure stated that he had summarized committee comments and distributed a draft of these comments to committee members before the RAB meeting. He indicated that the committee would review the draft comments and solicited input from other committee members. Dr. McClure noted that the committee had significant discussions and planned to submit substantive comments on OUI.

Ms. Christina Scott, Lockheed Martin, reported that the cost committee met to discuss OU1. She indicated that the next cost committee meeting was scheduled for July 26, 1995 at 7:00 p.m. at the Mountain View library.

Mr. Strauss asked Dr. McClure whether the comments he was preparing on the proposed remedy for OU1 would represent the technical committee. Dr. McClure responded that this was correct. Mr. Strauss asked whether the RAB would have an opportunity to review and approve the comments and noted that no additional RAB meetings were scheduled before the end of the OU1 public comment period on July 31, 1995. Dr. McClure responded that committee meetings are open to all RAB members and urged all interested members to attend. He added that 14 to 15 members attended the last committee meeting. Dr. McClure indicated that the OU1 comments were to be submitted on behalf of the technical committee only, and were not intended to represent the full RAB. He added that it was not feasible to solicit comments from the full RAB within the 60-day public comment period. Dr. McClure reiterated that draft comments were distributed to committee members immediately before the RAB meeting. He added that the technical committee would hold additional focus group meetings or present information to the RAB, but there was not sufficient time for these additional activities. Dr. McClure noted that committee actions do not preclude any individual from submitting his own comments or interpretations of the committee's comments. Mr. Glick stated that the RAB should discuss having the technical committee present its comments. Dr. McClure responded that he prepared comments to distribute to the technical committee before the RAB meeting so that the committee could review and work on the comments at the next week's committee meeting. He stated that the short time available caused the abbreviated review schedule.

Mr. Strauss asked if the technical committee comments were distributed to the entire RAB. Dr. McClure responded that comments were distributed only to committee members. Dr. McClure noted he summarized the committee's comments into a draft document only to facilitate review by the committee members. He added that the comments contained a broad range of viewpoints and that he expected the content of the comments to change after review by the committee members. Mr. Strauss asked whether the committee's comments could be distributed to the entire RAB before July 31, 1995. Ms. Sievers

asked why Mr. Strauss did not simply attend the committee meetings instead. Mr. Strauss responded that he was a paid consultant and that attendance at committee meetings was outside the scope of his responsibilities.

Dr. Julio Valera, ESA Consultants, Inc., stated that developing consensus would always be a problem, even if the entire RAB attended committee meetings. Mr. Davis commented that reaching consensus would be even more difficult if comments were mailed out to RAB members. Dr. Valera agreed. Ms. Sievers added that there were no other alternatives within the time allowed. Dr. McClure stated that he did not even have the mailing addresses of the technical committee members, not to mention the entire RAB. He added that he would provide a copy of the comments to any member who is interested. Mr. Chao stated that the Navy could distribute the comments. Dr. McClure indicated that he hoped the technical committee would reach consensus at the next committee meeting and that a document would be ready within 1 to 2 days after the committee meeting. He suggested that extending the OU1 public comment period would be an option to avoid the timing issues.

Mr. Strena stated that the compression of the schedule was the Navy's fault and that the schedule was unreasonable. He added that one of the purposes of the THE committee is education of the rest of the RAB. The committee should provide technical information to the full RAB, not only discuss technical issues within the committee. He stated that, because education is a key responsibility of the THE committee, the name of the committee should not be shortened to technical committee. Ms. Sievers added that the technical committee is not composed only of technical individuals. Mr. Strena stated that the THE committee is charged with providing information to the full RAB. Ms. Sievers asked if Mr. Strena could suggest a solution. Mr. Strena responded that the Navy should slow down the schedule. Mr. Chao stated that the RAB can request schedule extensions but that the established schedules follow EPA guidance for public participation. He indicated that the Navy was not attempting to force acceptance of any remedy by limiting the comment period.

Mr. Glick suggested that the RAB consider deviating from the meeting agenda to allow the THE committee to summarize its comments or to extend the public comment period. Mr. Gill stated that the community has the right to extend the comment period. Ms. Sievers asked what was the length of the

comment period. Mr. Chao responded that the comment period extends 60 days from the date of the newspaper advertisement announcing the comment period.

Mr. Davis noted that an extension would be useful only if it is used wisely. He stated that only members of the THE committee acted during the first extension of the comment period and the committee had not received any feedback on the comments reported in the minutes of the last RAB meeting. Mr. Davis stated that RAB members have a personal responsibility to review the documents in the Mountain View library. He added that the committee members have spent significant time developing comments without much input from the rest of the RAB. Ms. Scott stated that she could respond to the THE committee's comments within 30 days of receiving them. Mr. Davis reiterated that any extension must be used wisely.

Ms. Byster stated that she had previously discussed preparation of a 200-word fact sheet describing the OU1 proposed remedy with the THE committee. This fact sheet could be used to educate the RAB and the community. Ms. Byster asked Dr. McClure if he could provide this information. Dr. McClure agreed that the THE committee would provide the 200-word OU1 summary before the next communications, media, and outreach committee meeting. Mr. Davis asked when the communications, media, and outreach committee decided that an OU1 fact sheet was necessary. Ms. Byster indicated that she had spoken with Dr. McClure earlier in July.

Dr. McClure noted that if an extension is approved, the THE committee would have more time to develop consensus, prepare a simple technical position, and discuss comments with the full RAB. Mr. Chao reminded RAB members that individuals can submit comments in addition to those prepared by the THE committee. Mr. Strena added that an extension of the comment period would also allow the public to provide comments. He noted that the OU1 public meeting was well run and that he had hoped to see more coverage of the meeting in the local newspapers. Dr. Valera added that RAB members must review the documents to understand the technical issues contained in the committee's comments. Mr. Chao noted that the Navy could distribute the THE committee comments.

Mr. Glick moved to request a 30-day extension of the OUI public comment period. The motion was seconded and passed by on a hand-count vote (19 for, 1 against). Mr. Chao requested that the RAB provide an official letter requesting the extension. Mr. Glick agreed to provide this letter.

Ms. Sievers stated that the schedule for upcoming activities should be set during the RAB meeting. Mr. Glick indicated that the next THE committee meeting was scheduled for July 19, 1995 and the committee's goal was to produce a set of comments for review by the full RAB. These comments could be mailed out to the RAB along with the minutes and then discussed at the next RAB meeting (August 10, 1995).

Mr. Strauss asked whether the RAB should approve the comments as a group. Mr. Moss stated that the comments should not represent the entire RAB, but only the THE committee. Mr. Chao added that any public comment has the same importance as a comment from the RAB and, therefore, no additional consideration is given to RAB comments. Dr. Valera noted that even all the committee members may not agree on all the comments.

Mr. Glick restated that the next scheduled THE committee meeting was Wednesday, July 19, 1995. Dr. Valera indicated that the committee's comments would be forwarded to Mr. Chao by Monday, July 24, 1995 for distribution to the RAB. Ms. Sievers added that the RAB can decide at the next meeting whether the comments will represent only the THE committee or the full RAB. Mr. Strauss noted that support by the full RAB would require consensus on the comments at the next meeting. Mr. Gill encouraged all members to send comments because achieving consensus within a large group such as the RAB was unlikely. Mr. Strena added that each individual can respond to the committee's comments. Mr. Chao stated that the RAB committees were formed to provide focused discussions on issues, not to reach consensus. Ms. Cindi Flemming, U.S. Navy, added that RABs are not consensus-forming groups and that less outspoken members can be overpowered. She encouraged the RAB not to vote on approval of the THE committee comments. Dr. McClure stated that he prepared the draft comments to record all ideas by the committee and provide a starting point for the review. He hoped to achieve consensus from several members but also expected individuals would also submit their own comments, both for and against committee positions.

Mr. Glick asked to move on to the next committee report. Mr. Harney asked Mr. Glick who had moved to request the extension. Mr. Glick responded that he had moved for the extension. Mr. Harney noted that Mr. Glick was unable to initiate motions because he was chair of the meeting. Ms. Mary Vrabel, League of Women Voters, moved to request a 30-day extension of the OU1 public comment period. Ms. Sievers seconded the motion. The motion passed on a hand-count vote (20 for, 1 against). Mr. Glick indicated he would provide a letter to the Navy requesting the extension.

Mr. Glick reported that the organizational committee had not met since the last RAB meeting. He indicated that Ms. Susan Jun, DTSC, was assisting in reducing the length of the RAB bylaws distributed at the last meeting. Mr. Glick noted that the organizational committee had received some comments and solicited additional comments. He stated that the bylaws would be presented at the next RAB meeting. Ms. Byster asked what was the deadline for submitting comments and who should receive them. Mr. Glick responded that comments should be forwarded to him before the next organizational committee meeting on July 20, 1995.

RAB Bylaws Review Status

Discussion of the RAB bylaws was delayed pending additional revisions to the bylaws by the organizational committee.

Team Building and Buddy System

Mr. Chao introduced a team building exercise designed by Mr. Paul Lesti, Mountain View resident and community co-chair. RAB members were separated into five groups and each group was given a technical question. Groups discussed the question and then sought the answers, which had been distributed to other groups. After a brief discussion period, a spokesperson from each group presented the group's question and answer to the entire RAB. Ms. Sievers requested that a list of the questions and answers be provided as part of the next information packet distributed to the RAB. Mr. Chao agreed to provide this information.

Presentation of Regulatory Framework for OU1

Mr. Michael Bessette, CAL/EPA Regional Water Quality Control Board, San Francisco Bay Region (RWQCB), presented the regulatory framework for the OU1 landfills. Mr. Bessette stated that, as RPM for RWQCB, he works closely with Mr. Chou of CAL/EPA DTSC and Mr. Gill of EPA for regulatory oversight of Moffett Field. Mr. Bessette indicated RAB members can contact him with any questions and provided the following information:

Telephone: (510) 286-1028
Fax: (510) 286-3986
E-mail: mmbessette@aol.com

Mr. Bessette indicated that his presentation would summarize water quality issues at OU1 (Sites 1 and 2). He noted that most issues had already been discussed by the RAB. The following summarizes Mr. Bessette's presentation.

Regulatory guidelines for closure of landfills include both prescriptive and performance standards. The Navy's proposed use of an engineered alternative is an example of a performance standard. The waste containment division within RWQCB provides support and guidance for landfill closures. Landfill regulations are not complex and are mainly controlled by the date a landfill closed. Five time divisions control the various regulations that may apply to landfill closure:

<u>Date Closed</u>	<u>Applicable Regulations</u>
1. Before 1984	Limited Chapter 15, no Title 14, no Subtitle D
2. 1984 - 1988	All Chapter 15, no Title 14, no Subtitle D
3. 1988 - 10/91	Chapter 15, Title 14, no Subtitle D
4. 10/91 - 10/93	Chapter 15, Title 14, limited Subtitle D (cap)

5. After 10/93 Chapter 15, Title 14, Subtitle D

Ms. Bonnell asked for a definition of the term closure. Mr. Bessette responded that, according to Subtitle D of the Resource Conservation and Recovery Act (RCRA), closure occurs when a landfill stops receiving waste and begins remedial action. He added that closure is defined under Chapter 15 (of Title 23) of the California Code of Regulations only as when a landfill stops receiving waste. Ms. Bonnell asked if a formal action by RWQCB is required to designate closure. Mr. Bessette responded that no formal action is needed.

Mr. Strauss asked which definition applies, RCRA Subtitle D or Chapter 15. Mr. Bessette responded that RCRA regulations do not apply to OU1, and therefore, the date the landfills last received waste defines closure. Dr. McClure asked why RCRA did not apply. Mr. Bessette responded that the OU1 landfills did not receive waste after November 1991, which would be required for RCRA Subtitle D to apply. Mr. Chou added that CIWMB and RWQCB regulate solid waste landfills. If a landfill stopped receiving waste before RCRA was implemented, then the regulation does not apply. After RCRA began, closure required starting remedial action in addition to no longer receiving waste.

Mr. Chou stated that the OU1 landfills stopped receiving waste in 1974 to 1976. Mr. John Dufresne, Santa Clara County Department of Public Health, indicated that the Site 2 landfill is not completely enclosed by fencing and that additional activity had occurred there. He added that accidental dumping or placement of inert waste (such as concrete or asphalt) do not change the date when the landfill stopped receiving waste. Mr. Chao stated that PRC had surveyed the Site 2 landfill and found brush and concrete rubble that appeared to have been recently placed at Site 2. He added that the Navy was working with NASA to locate the sources of the debris.

Mr. Strauss asked Mr. Bessette to describe the differences between the state regulations (Chapter 15 and Title 14) and federal requirements (Subtitle D). Mr. Bessette responded that Title 14 regulations are as stringent as federal requirements. Mr. Strauss commented that timing of activities at the landfills is an issue and affects the applicability of RCRA Subtitle D versus Title 14. Mr. Bessette responded that Title 14 was the most applicable regulation to ensure remedial actions were conducted to the state's satisfaction. He added that the dates the landfills received waste also correspond to Title 14.

Ms. Sievers commented that Chapter 15 regulations govern surface and groundwater monitoring at municipal landfills. She added that Title 14 regulations mainly apply to methane control and cap construction. Mr. Bessette responded that Title 14 also refers to Chapter 15 for requirements for a groundwater monitoring plan.

Mr. Bessette continued his presentation by discussing consistency in regulating landfills in the Moffett Field area.

RWQCB staff at the waste containment division maintain regular communications with RWQCB RPMs for military sites to promote consistent application of landfill regulations. Case managers for the Mountain View and Sunnyvale landfills were contacted to discuss common concerns. RWQCB RPMs also share information; for example, Hamilton Air Force Base in Novato follows Chapter 15 regulations. RWQCB is striving for consistency in regulating landfills throughout the San Francisco Bay area. The regulatory framework of applicable regulations is the same for Moffett Field as for the Mountain View and Sunnyvale landfills.

Ms. Bonnell stated that, although the guidelines are the same, the stipulations placed on the Navy are different from the expensive cap and liner systems required at the Mountain View landfill. She added that her impression is that the Navy is being held to a lower standard of performance. Mr. Bessette responded that the later closure date for the Mountain View landfill may affect differences in requirements. Ms. Bonnell commented that Mountain View rushed to meet the timeframe imposed by the regulatory agencies, but the Navy has delayed action and yet must meet lesser requirements. She noted that the common perception is that the Navy must meet less stringent regulations. Mr. Chou responded that state regulators maintain communications to ensure consistent application of regulations. He indicated that DTSC and RWQCB would attend a meeting with CIWMB, the cities of Mountain View and Sunnyvale, and the Santa Clara County Department of Public Health on July 18, 1995 to ensure consistency.

Ms. Bonnell commented that protecting the environment is the critical issue. She added that San Francisco Bay is an important resource and the Navy must provide the same level of protection as other area landfills. Mr. Chou responded that Title 14 contains both prescriptive and performance standards for landfill design. He indicated that the Navy is following the performance standard with an alternate engineering design. Mr. Chou stated that the regulatory agencies were evaluating the Navy's assessment of the proposed cap design and discussing technical issues related to the design.

Ms. Sievers noted that protection of surface and groundwater were her main concerns for landfill design and that methane migration control was less important. Dr. McClure questioned the value of closing other landfills using sophisticated techniques if the OU1 landfills are closed to lesser standards. Mr. Bessette responded that consideration of risk to human health and danger to the environment are primary concerns for RWQCB.

Mr. Bessette continued his presentation by discussing the proposed caps for the OU1 landfills.

The proposed vegetative cap for OU1 is an engineered alternative to the prescriptive standards in Title 14. The cap must meet the performance standards in Title 14. RWQCB considers this vegetative cap to be equivalent in performance to the multilayer cap presented as Alternative 3 in the OU1 FS report. This evaluation is partially based on results from the HELP model. The HELP model output indicates an infiltration rate of 1.06 inches per year (in/yr) for the vegetative cap versus 1.12 in/yr for the multilayer cap. The difference of 0.06 in/yr is not considered sufficient to warrant spending twice as much for the multilayer cap.

Other factors considered in the evaluation of the vegetative cap include:

1. Landfill wastes are below the groundwater table at OU1. Therefore, the main reason for constructing a cap (that is, minimizing infiltration to prevent wastes from becoming saturated) is greatly diminished.
2. Leachate migration outside the landfills has not been observed.
3. The Navy will include contingency plans such as a groundwater collection trench and gas migration trench.

In summary, RWQCB's job is to protect human health and the environment. The state is evaluating performance parameters for the Navy's proposed cap and conferring with local agencies. The state has not yet selected its preferred alternative and modifications are still possible.

Following Mr. Bessette's presentation, Mr. Chao added that the OUI FS report contains three main alternatives, but that the selected remedy could be a modification of an alternative or a combination of alternatives.

Dr. McClure restated that the migration of landfill leachate to groundwater has not been observed and that this observation is part of the selection of an appropriate remedial alternative. He presented his hypothesis to explain the observed elevations of groundwater in the monitoring wells within and surrounding the Site 1 landfill. Dr. McClure expressed concern that, based on anecdotal reports, wastes may have been placed as deep as 21 feet below mean sea level. Silty sands at this depth beneath the landfill may be pathways for groundwater migration. He indicated that the direction of groundwater flow from Site 1 may be to the south and that an additional groundwater monitoring well located between wells W1-14 and W1-15 would be useful to confirm this theory. Dr. McClure stated that additional information should be collected before selecting the remedy and beginning cleanup actions at the landfills. Mr. Bessette responded that RWQCB will review Dr. McClure's comments.

Agenda for Next Meeting

Mr. Chao then concluded the RAB meeting by soliciting comments on the agenda for the next meeting. Agenda items for the next meeting will include the routine overview, minutes approval, committee reports, and RPM meeting report. The main focus topic will include a presentation of the THE committee's comments concerning OUI. Mr. Chao also solicited convenient site tour times from the RAB and asked if a starting time of 7:00 to 7:30 a.m. was acceptable. He indicated that the tour time would be discussed at the next meeting. Mr. Chao reminded the group that the next full RAB meeting

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would be held on August 10, 1995 at 7:00 p.m. at the same location (City of Mountain View police and fire administration auditorium). Mr. Chao then adjourned the meeting.

July 21, 1995

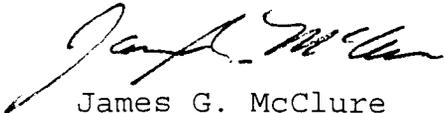
Mr. Steven Chao, Code 1843
Co-Chair, Moffett Field RAB
Engineering Field Activity - West
Naval Facilities Engineering Command
900 Commodore Drive, Building 208
San Bruno, California 94066 - 2402

RAB THE Committee Concerns
Operable Unit 1 (Landfills) Feasibility Study
Moffett Federal Airfield

Dear Mr. Chao:

Accompanying this letter is a summary of concerns about the May 15, 1995, Feasibility Study for Operable Unit 1 of Moffett Federal Airfield (Moffett Field, formerly Naval Air Station Moffett Field). These concerns have been identified during review of the Feasibility Study by the Technical, Historical, and Educational Committee (the THE Committee) of the Restoration Advisory Board (RAB) for Moffett Field. This summary is submitted for distribution by you to all members of the RAB, as agreed at the July 13, 1995, meeting of the RAB. The attached summary will form the basis for the planned THE Committee presentation to the whole RAB at the scheduled August 10, 1995, RAB meeting.

Very truly yours



James G. McClure
Chair, THE Committee

cc: Paul Lesti, Community Co-Chair, RAB

Comments on the report:

**OPERABLE UNIT 1
FINAL FEASIBILITY STUDY**

**Moffett Federal Airfield, California
(formerly Naval Air Station Moffett Field)**

Comments assembled by the

**Technical, Historical, and Educational Committee of the
Moffett Field Restoration Advisory Board (RAB)
July 19, 1995**

INTRODUCTION

The Technical, Historical, and Educational (THE) Committee of the Restoration Advisory Board (RAB) for Moffett Federal Airfield (Moffett Field) has reviewed the May 15, 1995, Final Feasibility Study for Operable Unit 1 of Moffett Field (the OU1 FS). Operable Unit 1 (OU1) consists of two landfills, called Sites 1 and 2 by the Navy. During the THE Committee review, several questions and concerns have been identified.

On the basis of the identified concerns, it is recommended that the May 15, 1995, OU1 FS be rejected or withdrawn until these concerns are adequately addressed.

OU1 FS concerns identified by the THE Committee include:

**CONCERNS WITH SITE INVESTIGATIONS AND ASSUMPTIONS ABOUT
CURRENT CONDITIONS**

- 1) There has been no investigation of lead contamination associated with the operation of the pistol firing range at Site 1.
- 2) The OU1 FS descriptions of hazardous wastes disposed in the landfills differ from those presented in relevant sections of the remedial investigation (RI) report. The result is that the possible extent of hazardous waste disposal is obscured in the OU1 FS.
- 3) The OU1 FS understates soil hydraulic conductivity measurements from the RI report by factors of up to approximately 10. Therefore, leakage out of the landfills could be 10 times greater than assumed.

12) Evidence presented at the OU1 FS public meeting indicated that Site 2 still may be receiving waste.

SUMMARY

The THE Committee supports the Navy's and the regulators' efforts to close the OU1 landfills expeditiously, cost-effectively, and in an environmentally protective manner. However, to achieve these goals, the concerns described above should be addressed.

Additional details on these concerns will be provided in a THE Committee presentation during the August 10, 1995, meeting of the full RAB. Time will also be available for a question and answer period and for additional OU1 issues to be raised by RAB members. In the meantime, the following members of the THE Committee have volunteered to be available by telephone to answer questions or collect additional issues from RAB members who cannot attend the August 10, 1995, meeting or who wish to discuss the OU1 FS prior to the meeting:

Julio Valera - 415-941-5551
David Glick - 408-987-0210
Cynthia Sievers - 415-961-6963
Jim McClure - 415-884-3280.

4) Available data, presented in the OU1 FS, indicate that both the Site 1 and Site 2 landfills are leaking. In spite of these data, the OU1 FS proposes remedial alternatives based on the assumption that the landfills are not leaking.

5) The existing groundwater monitoring network does not adequately characterize leachate or groundwater flow.

6) The OU1 FS does not appear to have reliably established the lateral and vertical extent of the landfills. In particular, available information indicates that Site 1 landfill refuse may have been placed into underlying aquifer material, but this is not indicated on the cross sections.

ASSUMPTIONS ABOUT FUTURE CONDITIONS

7) The OU1 FS essentially ignores the importance of the continued operation of the aging Moffett Field subdrain and storm drain system, including the active pumping required at the Building 191 pump station. The proposed remedial alternatives appear to depend on continued operation of the drainage system, but no provision for this is included in the alternatives.

REGULATORY COMPLIANCE AND FINANCIAL SECURITY CONCERNS

8) The OU1 FS does not appear to provide expressly for the continued funding of remedial activities such as Moffett Field drain maintenance and operation. This is important in light of recent Navy statements implying limits on the Navy's ability or willingness to insure future funding.

9) The OU1 FS indicates little difference between the performance of a single-layer soil cap and a multilayer cap designed to meet hazardous waste site closure requirements. However, review of the specifications of the multilayer cap used in the comparison modeling reveals that the proposed multilayer cap does not meet typical minimum requirements for such caps.

10) The OU1 FS does not consider the probable lower cost and better performance that might be obtained from the construction of landfill caps incorporating synthetic "impermeable" membrane layers. Such caps are now routinely constructed for landfill closures. Omission of such caps from consideration may result in an unrealistic assessment of the cost-effectiveness of a single-layer soil cap.

11) The OU1 FS appears to understate typical minimum requirements for landfill cap hydraulic conductivities by a factor of 10 to 100, depending on which criteria are used to determine the appropriate cap characteristics. Therefore, the proposed caps may leak more than some minimum standard caps.

Moffett RAB Committee and Events Schedule

<u>Event</u>	<u>Place</u>	<u>Date/Time / Contact</u>
Communication/Media Committee	Mtn. View Police/Fire Aud. 1000 Villa St, Mtn. View	Thursday August 3rd, 7:00 PM Leslie Byster 408-287-6707
San Francisco Bay Area RAB Community Caucus	833 Market St. San Francisco	Wednesday August 9th 7:00 PM Tim Little 510-658-0702
RAB General Meeting	Mtn. View Police/Fire Aud. 1000 Villa St, Mtn. View	Thursday August 10th, 7:00 PM Steve Chao 415-244-2563 Paul Lesti 415-941-1103
Technical Educational Historical Committee Meeting/Election	Mtn. View Senior Center 266 Escuela	Wednesday August 16th 7:00 PM Jim McClure 415-883-0112
Cost Committee	Mountain View Public Library	To be announced Christina Scott 415-961-9278
RAB Tour of Moffett	Moffett Federal Air Facility (meet at front gate)	TBA
Organizational Committee	683 McCarty Street Mtn. View	Thursday August 17th 7:00 PM David Glick 408-987-0210
Operable Unit 5 Public Meeting	Mountain View City Hall 500 Castro Street	October 12th 7:00 PM (to be confirmed) Steve Chao 415-244-3563