

County of Santa Clara

Environmental Resources Agency
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August 23, 1995

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, CA 94066-2402

RE: Revised Draft Final Feasibility Study, Operable Unit 1 (FS-OU-1), Moffett Federal Airfield

Dear Mr. Chao:

A review of the referenced document has been completed by this Department. The following deficiencies in meeting the requirements of Title 14, California Code of Regulations (14 CCR) were noted:

1. **14 CCR 17773 - Final Cover:** An Engineered alternative for final cover is submitted in lieu of the prescriptive standard for final cover. Engineered alternatives shall only be approved when the operator can demonstrate to the satisfaction of the California Integrated Waste Management Board (Board) and the Local Enforcement Agency (LEA) that requirements for proposing an engineered alternative [California Code of Regulations, Title 14, Section 17773(c)] can be satisfied. The need for an engineered alternative to the prescriptive cover standard has not been demonstrated.
2. **14 CCR 17781 - Leachate Control During Closure and Post Closure:** Leachate must be monitored, collected, treated and disposed of in an appropriate manner. FS-OU-1 does not address the requirement.
3. **14 CCR 17783 - Gas Monitoring and Control During Closure and Post Closure:** Landfill gases must be controlled and monitored during closure and post closure for a period of 30 years or until written authorization to discontinue is given by the Board and LEA. FS-OU-1 does not adequately address the requirements of 14 CCR 17783 through 17783.15.
4. **14 CCR 17796 - Post Closure Land Use:** Post Closure land use must be compatible

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with protection of the final cover and post closure environmental systems. Changes in proposed land use must be approved by the appropriate agencies. FS-OU-1 does not adequately address post closure land use.

FS-OU-1 should be revised to correct these deficiencies and to reflect compliance with State of California standards and regulations.

If you have any questions concerning this matter please feel free to call me at (408) 299-6930.

Sincerely,



John Dufresne, R.E.H.S.
Office of Solid Waste Enforcement
Hazardous Materials Compliance Division

JD:rh

cc: Tamara Zielinski
Diane Nordstrom
Michael Bessette