



February 1, 1996

Mr. Stephen Chao/Mr. Hubert Chan  
Department of the Navy  
Engineering Field Activity West  
Naval Facilities Engineering Command  
900 Commodore Drive, Building 208  
San Bruno, California 94066-2402

CLEAN Contract N62474-88-D-5086  
Contract Task Order 0236

**Subject: Moffett Federal Airfield Operable Unit 1 (OU1) Feasibility Study (FS)  
Draft Response to Santa Clara County Comments**

Dear Messrs. Chao and Chan:

Enclosed are PRC Environmental Management, Inc.'s (PRC's) responses to written comments received from the Santa Clara County Environmental Resources Agency (SCCERA) concerning the OU1 FS Report and Proposed Plan. SCCERA written comments were mistakenly not included in the previous November 30, 1995 submittal. Enclosed are pages of the updated November 30, 1995 response to comment letter that incorporates SCCERA written comments. PRC apologizes for any inconvenience this may have caused.

If you have any questions, please call us at (303) 295-1101.

Sincerely,

Thomas J. Peters, P.E.  
Project Engineer

Michael N. Young  
Project Manager

TJP/cmg

Enclosures

cc: John Dufresne, SCCERA  
Michael Gill, EPA  
Joseph Chou, DTSC  
Michael Bessette, RWQCB

3.9 COMMENTS FROM SANTA CLARA COUNTY ENVIRONMENTAL RESOURCES AGENCY

*Comment 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.*

Response: During the June 1995 public comment period, CIWMB stated that the Navy's proposed alternative would not meet specified performance standards in 14 CCR. As a result, the Navy has agreed to revise the proposed plan based on a prescribed, state pre-approved configuration for the two landfill caps at OU1.

*Comment 2: 14 CCR 17781 - Leachate Control During Closure and Post Closure: Leachate must be monitored, collected, treated and disposed of in an appropriate manner. The OUI FS does not address the requirement.*

Response: Regarding this matter, 14 CCR 17781 also states:

Leachate control and monitoring shall cease only after the operator demonstrates, to the satisfaction of the local enforcement agency, regional board and the Board, that leachate is no longer being produced, or the discharges of leachate will have no effect on water quality. This demonstration shall take the form of a written report submitted to the local enforcement agency, and the Board and the regional board. Factors the local enforcement agency and the Board shall consider when ending leachate control shall include monitoring results, nature of refuse, the presence and design of landfill containment structures, local hydrology and geology, and local land and water use.

To address this requirement, the OU1 FS stated that refuse is below the water table and, as a result, leachate will always be produced. However, Section 1.3 and Section 2.1 of the FS demonstrate that the leachate produced has no effect on water quality

and that leachate plumes have not migrated and are not expected to migrate in the future. Therefore, it has been the Navy's position that leachate collection and treatment is not necessary at this time. DTSC, EPA, and RWQCB concur with this approach, as it is fundamental to the development of the OU1 FS and subsequent recommendations.

*Comment 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 or LEA. The OUI FS does not adequately address the requirements of 14 CCR 17783 through 17783.15.*

**Response:** To provide for the protection of public health, safety, and the environment, 14 CCR 17783 states that the operator shall ensure that landfill gases generated at the facility are controlled during the periods of closure and postclosure maintenance, in accordance with the following requirements:

- (1) The concentration of methane gas must not exceed 1.25 percent by volume in air within on-site structures.
- (2) The concentration of methane gas migrating from the landfill must not exceed 5 percent by volume in air at the facility property boundary or an alternative boundary in accordance with Section 17783.5.
- (3) Trace gases shall be controlled to prevent adverse acute and chronic exposure to toxic and/or carcinogenic compounds.

The revised cap configuration for the Site 1 landfill will include gas venting beneath the low-permeability layer. This combination of layers will facilitate controlled venting of gas to meet the requirements of 14 CCR 17783. In addition, a gas venting trench will be constructed around the western perimeter of Site 1 to further meet the requirements of 14 CCR 17783. Landfill gases are not being generated at Site 2 and, as a result, gas venting is not included at Site 2.

*Comment 4: 14 CCR 17796 - Post Closure Land Use: Post Closure land use must be compatible with protection of the final cover and post closure environmental systems. Changes in*

*proposed land use must be approved by the appropriate agencies. The OUI FS does not adequately address post closure land use.*

Response: Article 7.8 of 14 CCR has been identified as applicable for the OUI remedial action. Therefore, the provisions of 14 CCR 17796 will be specified for compliance in the ROD.

### **3.10 COMMENTS FROM THE NATIONAL AERONAUTICS AND SPACE ADMINISTRATION**

*Comment 1: Alternative 2 is acceptable to NASA only if the Bay Conservation and Development Commission (BCDC) concurs that it is consistent with the San Francisco Bay Plan. NASA would like assurance that the remedy selected is acceptable to the state and any tideland trust concerns they may have. Therefore, NASA requests that the Navy submit a Consistency Determination to BCDC for concurrence.*

Response: The Navy has discussed the selected remedy with the BCDC. The BCDC preliminarily indicated that the remedy will be acceptable; but also identified several concerns. The Navy will continue to consult with the BCDC throughout the RD to address concerns. In addition, the Navy is currently investigating the need to prepare a determination of consistency.

*Comment 2: Any wetland mitigation plans to increase or maintain wetlands should be closely coordinated with NASA.*

Response: The Navy will coordinate wetland mitigation plans with NASA.

### **3.11 COMMENTS FROM CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD**

Note: CIWMB comments were provided in letter format. Therefore, the letter received by the Navy is presented with interjected responses throughout the letter.

*CIWMB staff has concerns that the vegetative soil cap that was presented as the selected remedy in the Proposed Plan did not meet the final cover standards of 14 CCR 17773. Since this standard was*

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MOFFETT FIELD  
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DRAFT RESPONSE TO COMMENTS ON THE  
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PROPOSED PLAN

DATED 30 NOVEMBER 1995

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