



Cal/EPA

Department of
Toxic Substances
Control

July 22, 1996

Pete Wilson
Governor

700 Heinz Avenue
Suite 200
Berkeley, CA
94710-2737

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

James M. Strock
Secretary for
Environmental
Protection

Dear Mr. Chao:

**THE DRAFT FINAL 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 Joseph Chou at (510) 540-3830 to ensure a coordinated approach for all regulatory comments.

Sincerely,

Daniel E. Murphy P.E., Chief
Closing Bases Unit
Office of Military Facilities

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Enclosures

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



Mr. Stephen Chao
July 22, 1996
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Mr. Michael D. Gill
U.S. Environmental Protection Agency
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San Francisco, California 94105

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Assistant chief
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National Aeronautics and Space Administration
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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

GENERAL COMMENTS

1. According to the Navy, significant amount of dredged soil from City of Palo Alto may be accepted and used as landfill cap foundation layer for Sites 1 and 2 at Moffett Field. The Department believes it is appropriate for the Navy to pursue this cost-saving option. However, the Navy should provide sufficient information to the regulatory agencies and consider potential impacts to the ARARs of OUI ROD.

SPECIFIC COMMENTS

1. Page 2, 1st Paragraph, Description of the Selected Remedy
As mentioned in Table 3, groundwater monitoring requirements in both Title 14, California Code of Regulation (14 CCR) and 23 CCR are applicable.
2. Page 10, Site Description
To be consistent with the Station-Wide Remediation Investigation Report and other MFA documents, it is suggested to merge the category "Additional Sites" into "Station-wide Sites"
3. Page 20, 3rd Paragraph; Section 2.6.2
The reason to install a subsurface groundwater collection trench along the northern border of Site 1 is to intercept potential plume migration to surrounding surface water bodies. Therefore, the last sentence of this paragraph should be deleted.
4. Page 21, 3rd Paragraph; Section 2.6.2
It is not clearly stated that how the Navy will meet the substantive requirements of Nationwide Permit 38 through the U.S. Army Corps of Engineers. In addition, the assessment of impacted wetland acreage is only the first step of corrective action procedures addressed in DTSC's letter dated May 19, 1995.

Mr. Stephen Chao
July 22, 1996
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5. Page 44; Table 3
Please explain why 23 CCR 2500 was deleted in the draft final document.
6. Page 45, Table 3 Location-Specific ARARs
Title 22, California Code of Regulation, section 66264.18 should be considered as an ARAR.
7. Page 50, 1st Paragraph; Section 2.11.2.2
Please see Specific Comment Number 4.
8. Page 50, 2nd and 3rd Paragraph; Section 2.11.2.2
Please note that more wetland areas were identified by Department of Fish and Game and detailed discussion was included in DTSC's letter dated June 22, 1996.
9. Page 51, 3rd Paragraph; Section 2.11.2.3
The first sentence "State and federal hazardous waste landfill closure regulations (Subtitle C and Title 22 CCR) are not applicable since hazardous waste disposal cannot be confirmed at either landfill and the landfills have not attained interim status" is confusing. DTSC believes that hazardous waste such as VOCs, SVOC, and PCBs etc. detected in Sites 1 and 2 confirmed previous hazardous waste disposal activity. In fact, CERCLA municipal landfill may contain a lesser extent of hazardous wastes through different ways (U.S. EPA 1991). However, the decision about whether a Subtitle D or Title 22 closure requirement is relevant and appropriate is based on a variety of factors and cannot be eliminated by the above mentioned oversimplified statement.

REFERENCE

U.S. EPA 1991, Conducting Remedial Investigations/Feasibility Studies for CERCLA Municipal Landfill Sites

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, SUITE 500

AKLAND, CA 94612

(510) 286-1255



July 15, 1996
File No. 2189.8009 (MBR)

Mr. Joseph Chou
DTSC Region 2
Office of Military Facilities
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2737

**SUBJECT: RWQCB's Comments on the Draft Final Operable Unit 1,
Record of Decision, for Moffett Federal Airfield, June 7, 1996**

Dear Mr. Chou:

Enclosed are RWQCB staff's comments on the above referenced report. Please contact me at (510) 286-1028 if you have any questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Michael Rochette".

Michael Bessette Rochette
Remedial Project Manager

Attachment

Prepared By: Michael Bessette Rochette, RPM

Phone No.: (510) 286-1028

Date: July 12, 1996

File No.: 2189.8009 (MMB)

Subject: RWQCB Staff Comments on the Draft Final OU1 ROD,
Moffett Federal Airfield, June 7, 1996.

Specific Comments (continued):

7. **Page 26, Sec. 2.7.2.3, first par.:** This discussion should clearly state that collection and treatment of captured leachate action is a component of the ROD and be expanded to include the proposed discharge limits and methods.
6. **Page 36, Sec. 2.9:** If the proposed selected remedy incorporates a cap with a drainage layer, it should not be changed at a future date. Additionally, the low-permeability layer is not adequately described.
7. **Page 38, Sec. 2.10:** See specific comments 4.
8. **Page 40, Sec. 2.10:** What change in leachate head levels will trigger leachate pumping?
9. **Page 40, Sec. 2.10:** Please provide details regarding the plan for handling, storage and ultimate disposal of leachate in the event of leachate pumping to reduce head levels.
10. **Page 51, Sec. 2.11.2.3:** See general comment 4.

Prepared By: Michael Bessette Rochette, RPM

Phone No.: (510) 286-1028

Date: July 12, 1996

File No.: 2189.8009 (MMB)

Subject: RWQCB Staff Comments on the Draft Final OU1 ROD,
Moffett Federal Airfield, June 7, 1996.

General Comments:

1. The ROD lacks a sufficient discussion detailing the significance of the Building 191 pumping activities and the affect on the groundwater hydrology within OU1. Incorporate text within Section 1 and Section 2.5, describing the impact on groundwater gradients and identifying the continued operation of Building 191 as necessary for the successful implementation of the selected remedy.
2. The ROD should incorporate information regarding the recently identified PG&E thirty-six inch, high-pressure natural gas line and the potential environmental impacts at Site 2, e.g., a potential horizontal conduit for contaminant migration. Please revise the ROD to address the pipeline and potential environmental implications. Include a map locating the pipeline within OU1 and a summary of the discussions and agreement with PG&E regarding the selected remedy for Site 2. This issue should also be included in section 2.9 with information supporting the determination of non-impact to the selected remedy.
3. Section 2.5.1, Site 1 Characteristics, does not provide any information regarding the former firing range and the potential environmental concerns, e.g., unexploded ordinance and lead contamination. Please incorporate text describing this former activity and any associated potential environmental impacts of concern.
4. While the ROD states that the installation of the subsurface groundwater collection trench is a major component of the remedy, it is not very clear if are the operation of the groundwater collection trench and treatment of collected groundwater also components? If so, additional information is required to address treatment, discharge and associated action specific ARARs.

Specific Comments:

1. **Distribution List:** Please revise to Michael Bessette Rochette, RWQCB.
2. **Page 1, Sec. 1.0, third par.:** Please describe the types of monitoring.
3. **Page 1, Sec. 1.0, third par.:** Please revise to State of California, Environmental Protection Agency.
4. **Page 2, Sec. 1.0, first par.:** How will activation of the collection trench be determined. Specifically, what statistical method will be used to evaluate potential detections as statistically relevant.
5. **Page 20, Sec. 2.6.2, second par.:** See specific comment 4.
6. **Page 21, Sec. 2.6.2, second par.:** Please provide the time frame for delivery of the Navy's wetland mitigation plan.
7. **Page 25, Figure 4:** Please label the location of the former firing range.



California
Environmental
Protection
Agency

Integrated
Waste
Management
Board

8800 Cal Center Drive
Sacramento, CA 95826
(916) 255-2200



Pete Wilson
Governor

James M. Strock
Secretary for
Environmental
Protection

July 11, 1996

Mr. Joseph Chou
Remedial Project Manager
Department of Toxic Substances Control
Region No. 2, Office of Military Facilities
700 Heinz Ave., Suite 200
Berkeley, CA 94710-2737

Subject: Review of the Moffett Federal Air Field, Draft Final Landfill Operable Unit 1,
Record of Decision (ROD)

Dear Mr. Chou,

Pursuant to your request staff of the California Integrated Waste Management Board (CIWMB) have reviewed the following Document:

Moffett Federal Airfield Draft Final Operable Unit 1 Record of Decision, dated June 7, 1996, Issued by: U.S. Department of the Navy - Engineering Field Activity West, Naval Facilities Engineering Command and U.S. Environmental Protection Agency Region 9 - San Francisco

Upon reviewing the Draft Final ROD, CIWMB staff found that some Applicable or Relevant and Appropriate Requirements (ARARs) that were submitted to the Navy were not included in the ROD and that additional ARARs would be needed to address the handling of contaminated soils.

The last 3 ARARs on the enclosed Table 1 were not included in the ROD. These ARARs are necessary to establish the contents of a Closure and Postclosure Maintenance Plan and a Closure Certification Report. Since they only address the contents of the Plans and Reports they are not procedural requirements, however they are substantive requirements as determined in previous landfill RODs. Therefore they should be included as Relevant and Appropriate in the Moffett Federal OU 1 ROD.

In working with landfill closures at other Military Facilities CIWMB staff have found that a substantial cost savings can be obtained by using acceptable levels of contaminated soils in the foundation layer of the landfill final cover. These soils can also be used to build up the final grades of the landfill. This process saves the cost of disposal of the contaminated soil and import cost of clean fill soil that would be used to build up the final surface of the landfill to an appropriate grade. To facilitate this process CIWMB staff is providing the ARARs on Table 2. These ARARs will need to be incorporated into the ROD to ensure that the contaminated soils are handled in a manner protective of human health and the environment.

Thank you for the opportunity to comment on the ROD. If you have any questions on these comments please call Diane Nordstrom at (916) 255-1196.

Sincerely,


Tamara Zielinski
Waste Management Engineer
Closure and Remediation Branch



State ARARs for Solid Waste Disposal Site Closure and Postclosure Maintenance

Table 1

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 or Relevant and Appropriate	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 or Relevant and Appropriate	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 or Relevant and Appropriate	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 or Relevant and Appropriate	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 or Relevant and Appropriate	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
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 or Relevant and Appropriate	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 or Relevant and Appropriate	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 or Relevant and Appropriate	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 STATE ARCHIVES

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 17781 Chapter 3, Article 7.8 Disposal Site Closure and Postclosure Maintenance	Applicable or Relevant and Appropriate	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 or Relevant and Appropriate	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 3% 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
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 or Relevant and Appropriate	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 or Relevant and Appropriate	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 18267.3 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. Relevant and appropriate for closing sites that did not receive 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. Relevant and appropriate for closing sites that did not receive 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 certification 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. Relevant and appropriate for closing sites that did not receive 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

State ARARs for Solid Waste Disposal Site Excavation and Consolidation

Table 2

Source	Standard, Requirement, Criterion, or Limitation	ARAR Status	Description	Comment	Associated Site
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17636 Chapter 3, Article 7.3 Disposal Site Records	Applicable	Weight/Volume Records: the weight or volume of waste accepted must be determined to an accuracy of $\pm 10\%$	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17637 Chapter 3, Article 7.3 Disposal Site Records	Applicable	Subsurface Records: the length and depth of any cut(s) made in natural terrain where fill will be placed and the depth to groundwater must be determined and documented.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17638 Chapter 3, Article 7.4 Disposal Site Improvements	Applicable	Site Security: the perimeter of the landfill must be secured either through barriers or topographic constraints to discourage unauthorized entry.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17659 Chapter 3, Article 7.4 Disposal Site Improvements	Applicable	Access Roads: landfill roads must be reasonably smooth to minimize dust and tracking of materials onto public roads.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites.
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17676 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Confined Unloading: Requires limiting unloading area, controlling windblown materials, and deposition at toe of fill.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17677 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Spreading and Compacting: Requires spreading and compacting of refuse in layers.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17678 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Slopes and Cuts: The slope of the working face shall be maintained at a ratio which will allow effective compaction of the wastes. The depth of cuts and slopes of trench sides shall not exceed specified horizontal to vertical ratios.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17680 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Stockpiling: Requires stockpiled cover material and unacceptable native materials to be placed so as not to cause problems or interference with site operations.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites

State ARARs for Solid Waste Disposal Site Excavation and Consolidation

Source	Standard, Requirement, Criterion, or Limitation	ARAR Status	Description	Comment	Associated Site
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17684 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Intermediate Cover: Requires cover on fill where no additional refuse will be deposited within 180 days.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17686 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Scavenging: Scavenging is prohibited.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17687 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Salvaging Permitted: Salvaging is permitted in a planned and controlled manner.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17688 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Volume Reduction and Energy Recovery: Volume reduction and energy recovery are permitted in planned and controlled manners.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17689 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Processing Area: Processing area shall be confined to greatest degree practicable.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17690 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Storage of Salvage: Salvage material must be safely isolated for storage.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17691 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Removal: Storage time for salvage materials shall be limited to a safe duration.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17692 Chapter 3, Article 7.5 Disposal Site Operations	Applicable	Non-Salvageable Items: Items capable of impairing public health shall not be salvaged without approval by the agency.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites

State ARARs for Solid Waste Disposal Site Excavation and Consolidation

Source	Standard, Requirement, Criterion, or Limitation	ARAR Status	Description	Comment	Associated Site
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17701 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Nuisance Control: Each site shall be operated and maintained so as not to create a public nuisance.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17704 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Leachate Control: The operator shall take adequate steps to monitor, collect, treat, and effectively dispose of leachates.	The state does not intend that subsurface leachate monitoring and collection systems need to be installed at existing sites unless there is evidence of leachate production and/or accumulation. Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17705 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Gas Control: Landfill gas control may be required based on the monitoring results.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17706 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Dust Control: The operator shall take adequate measures to minimize the creation of dust.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17707 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Vector and Bird Control: The operator shall take adequate measures to control or prevent the propagation, harborage, or attraction of flies, rodents, or other vectors, and to minimize bird problems.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17708 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Drainage And Erosion Control: Adequate drainage shall be provided. Effects of erosion shall be promptly repaired and steps taken to prevent further occurrence.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17709 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Contact with Water: No solid waste shall be deposited in direct contact with surface water.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17710 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Grading of Fill Surface: Covered surfaces of the disposal area shall be graded to promote run-off and prevent ponding, accounting for future settlement.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites

State ARARs for Solid Waste Disposal Site Excavation and Consolidation

Source	Standard, Requirement, Criterion, or Limitation	ARAR Status	Description	Comment	Associated Site
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17711 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Litter Control: Litter and loose materials shall be routinely collected and disposed of properly.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17713 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Odor Control: The disposal site shall not be a source of odor nuisance.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 17741 Chapter 3, Article 7.6 Disposal Site Controls	Applicable	Burning Wastes: Burning wastes shall be extinguished.	Applies to solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation and excavation sites
California Integrated Waste Management Act of 1989 PRC 40502, 43020, 43021 and 43030	14 CCR 18222 Chapter 5, Article 3.2 Reports of Facility Information	Relevant and Appropriate	Report of Disposal Site Information. The planning and procedural requirements necessary to ensure that solid waste is handled and disposed in manners that protect public health and safety and the environment must be conducted.	Applies to operating solid waste disposal sites as defined by Public Resources Code Section 40122.	For consolidation sites

14 CCR - California Code of Regulations, Title 14 ARAR - applicable or relevant and appropriate requirement ROD - Record of Decision RDR/RA - remedial design/remedial action