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Ser 1843/7024
29 Oct 1996

Mr. C. Joseph Chou
State of California
Environmental Protection Agency
Department of Toxic Substances Control
700 Heinz Avenue, Suite 22
Berkeley, CA 94710-2737

Subj: CONSOLIDATION OF SITES 1 AND 2, MOFFETT FEDERAL AIRFIELD

Dear Mr. Chou:

This letter is to confirm the Navy's understanding of some of the issues concerning the consolidation of Site 2 into Site 1. The letter also addresses some issues and guidance questions that require resolution by the regulatory agencies before the Navy can make a final decision as to which way to proceed with the work at Site 2. Many of the topics in this letter were discussed in a phone conversation on October 17, 1996. The parties in that phone conversation included Mike Gill from the U.S. Environmental Protection Agency (EPA), Michael Rochette from the California Regional Water Control Board (RWQCB), Tamara Zielinski from the Integrated Waste Management Board (IWMB), Don Chuck from the Navy, yourself, and myself. There were five main issues discussed concerning this subject. They are: the designation of Site 1 as a Corrective Action Maintenance Unit (CAMU), waste sampling requirements, excavation limits and further exploratory actions, water monitoring requirements, and the handling of ground water.

It is the Navy's understanding that the designation of Site 1 as a CAMU would waive many RCRA requirements concerning the disposal of wastes. Almost all of the waste removed from Site 2 could be placed at Site 1. Additionally, designation of Site 1 as a CAMU would not alter the proposed cap design for that location. Site 1 will be capped according to Title 14 requirements. The guidance and regulations concerning the formation of a CAMU will be studied by the regulatory agencies and provided to the Navy. The final determination on the requirements for establishing a CAMU will be made by your office (DTSC). Based on the guidance provided, the Navy will decide whether are not to designate Site 1 as a CAMU.

There is concern with the sampling requirements for the waste removed from Site 2. It is the Navy's understanding that waste will be visually screened as it is removed. There will not be any laboratory sampling of the contents at Site 2.

In regards to these first two issues, the Navy would like to propose a possible resolution. The Navy feels that since the waste streams for Sites 1 and 2 were similar in nature, the wastes from Site 2 should be allowed to be transferred to Site 1 without designating Site 1 as a CAMU and without sampling and segregation of the wastes from Site 2. Addition of the waste from Site 2 will not increase the contamination at Site 1 nor will it be adding additional contaminants since both landfills received essentially the same wastes. The consolidation effectively would be concentrating

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two similar landfills into a smaller area. The wastes from Site 2 will be removed from the ground water and placed on the surface of Site 1 above the ground water. The subsequent capping of Site 1 will then isolate the waste from Site 2 from leaching any contamination into the ground water.

It is the understanding of the Navy that the waste to be excavated from Site 2 is the buried material found in the vicinity of monitoring well W2-10(F) and confirmed by trenching carried out by the Navy on September 11, 1996. The excavation of waste will continue until that waste has been removed and no longer appears in the bottom or walls of the excavation. It is the Navy's understanding that at that point excavation of Site 2 will cease and the removal effort at Site 2 will be considered completed; not further exploratory trenching or boring will be required. It is also the Navy's understanding that the waste found in the trench is the only waste that will require removal. The Navy will not be required to excavate and remove any inert waste or construction debris that is part of the fill overlying the waste or other parts of the site. The inert waste (mainly pieces of brick, concrete, glass, etc.) may remain as long as it does not form a safety hazard at the surface. The Navy will remove the mounds of debris that covers the surface at Site 2 and place them at the area of Site 1. Confirmation sampling of the excavation will be done after the waste has been removed. The Navy requests guidance from the regulatory agencies as to what will be required for such sampling including reference to the appropriate regulations on which the guidance is based.

The issue for monitoring ground water at Site 2 after consolidation is done still needs to be resolved. The Navy feels that monitoring requirements be based on the results of the confirmation sampling done after excavation. If the confirmation sampling reveals little or no residual contamination left in the soils, then only minimal monitoring should be required. If there is contamination left, the monitoring requirements should be based on expected risks to the environment.

Finally, the Navy is requesting guidance on the handling of ground water extracted during the excavation work. The recent trenching at Site 2 has confirmed that portions of the waste are saturated with ground water. Removal of the ground water is necessary to allow excavation of the waste. The handling and disposal of this water is important to the decision as to which way to proceed at this site. One suggestion is to store the water in a tank and use this water for dust control in the footprint of Site 1. The Navy wishes to know if this is a viable option. The Navy wants some guidance on the issue of the ground water. The Navy also requests references to the regulations on which the guidance is based on.

The issues discussed in the above paragraphs need to be resolved in order for the Navy to make a final determination on which way to proceed with Site 2. Consolidation of the waste at Site 2 can be a benefit to the environment by removing waste that could become a source of contamination to the ground water and isolating it above the ground water under a protective cap at Site 1. This can only happen, however, if the consolidation does not become a more complicated and expensive process than the current proposed remedy: an engineered cap.

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The Navy requests a timely response to the issues raised in this letter. The Navy would like to be able to make a final determination for Site 2 by early November so that the remedial processes can be set in motion. We would also like to thank you for the time and effort all of you have provided us so far in evaluating this option. If you have any further questions or comment, call me at (415) 244-2563.

Sincerely,

ORIGINAL SIGNED BY:
STEPHEN G. CHAO
~~BRAC Environmental Coordinator~~
By direction of
the Commanding Officer

Copy to:

U.S. Environmental Protection Agency (Attn: Michael Gill)
Regional Water Quality Control Board (Attn: Michael Rochette)
CA Integrated Waste Management Board (Attn: Tamara Zalinski)

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