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MOFFETT FIELD
SSIC NO. 5090.3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

November 16, 1999

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Stephen Chao
900 Commodore Drive
San Bruno, CA 94066-2402

Dear Mr. Chao:

The U.S. Environmental Protection Agency has reviewed the Draft As-Built Report for Site 1 and 2 Landfill Closures at Moffett Field Federal Airfield. Our comments are enclosed.

Generally, the Report supports the conclusion that the closures were performed according to the design drawings and specifications, and describes deviations made due to field conditions. During our inspection of the landfill, however, we noted cracks in the vegetative cover that require ongoing post-closure maintenance and regular inspection. While corrective actions are discussed for the Waste Consolidation Area in the As-Built Report, further care should be taken to ensure that all areas are inspected for cracks on a regular basis and that corrective actions are implemented in all cracked areas. Also, the gravel silt traps in the v-ditch along the eastern side of the Site 1 Landfill were not shown on the As-built Drawings, but should be part of the Drainage System Inspection and Maintenance Program outlined in the post-Closure Maintenance Plan.

We appreciate the opportunity to review this Report. Please call me at (415) 744-1685 if you have any questions regarding our comments.

Sincerely,

A handwritten signature in black ink that reads "Roberta Blank".

Roberta Blank
Remedial Project Manager

cc: Joseph Chou, RWQCB

**Review of the Draft As-built Report for Site 1 and Site 2 Landfill Closure
Moffett Federal Air Field, Mountain View, California**

GENERAL COMMENTS

1. The Report describes and sufficiently documents the field activities to support the conclusion that the project and program requirements for the Site 1 and Site 2 Landfill Closures were met and performed in accordance with the Design Drawings and Specifications.
2. The Report describes deviations from the Design Drawings and Specifications due to conditions encountered during construction. These deviations were documented in the form of Field Work Variances (FWV) or Contractor Requests for Information (RFI) (see Appendix O of the Report). All deviations noted during this cursory review were in accordance with the design intent and were approved by the Navy.
3. Section 2.4.4.4 of the Report states that significant desiccation cracking of the vegetative cover for the Site 1 Landfill occurred in 1998 in the "Waste Consolidation Area" which is the elevated eastern portion of the Site 1 Landfill. FWV No. 9 implements a corrective action to scarify, smooth roll, and re-seed the eastern "mound". However, it is unclear whether areas of cracking on the flat portion between the toe of slope and the perimeter road along the eastern side of the Site 1 Landfill (noted during the site inspection) were also repaired in this manner. It appears that repairing cracks in the vegetative cover should be an ongoing post-closure maintenance issue. Further care should be taken to ensure that all areas are inspected for cracks on a regular basis and that corrective actions are implemented in all cracked areas.
4. The As-built Drawings do not show the gravel silt traps in the v-ditch along the eastern side of the Site 1 Landfill which were noted during the site inspection. Although it may not be critical for the silt traps to be shown on the As-built Drawings, it would be prudent to include their periodic inspection and cleaning, if necessary, as part of the Drainage System Inspection and Maintenance Program outlined in the Post-Closure Maintenance Plan.