



MATHER AFB CALIFORNIA

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 2728



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

NOV 13 2008

MEMORANDUM FOR SEE DISTRIBUTION

FROM: AFRPA Western Region Execution Center
3411 Olson Street
McClellan CA 95652-1003

SUBJECT: Transmittal of the Final Explanation of Significant Difference, Institutional Controls
for Groundwater Remedy, Site WP-12 (Aircraft Control and Warning Site)

1. The subject Final Explanation of Significant Difference (ESD) is provided for your records and files.
2. This document reflects the latest agreements with the regulators and Air Force.
3. Please contact me at 916-643-0830, x105 should you have any questions.


STEVEN C. HAMILTON
BRAC Environmental Coordinator

Attachment:
Final ESD for Site WP-12

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FINAL

Explanation of Significant Difference

**Institutional Controls for Groundwater
Remedy, Site WP-12**

Aircraft Control and Warning Site

Mather, California

September 2008

AFRPA Western Region Execution Center
3411 Olson Street
McClellan CA 95652-1003

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List of Acronyms

AC&W	Aircraft Control and Warning
AFBCA	Air Force Base Conversion Agency
AFRPA	Air Force Real Property Agency
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	Contaminant of Concern
DTSC	Department of Toxic Substances Control
EPA	United States Environmental Protection Agency
ESD	Explanation of Significant Difference
FAA	Federal Aviation Administration
FFA	Federal Facility Agreement
FOST	Finding of Suitability to Transfer
gpm	gallons per minute
IC	Institutional Control
IRP	Installation Restoration Program
MCL	Maximum Contaminant Level
mg/l	milligram per liter
NCP	National Contingency Plan
NFA	No Further Action
OU	Operable Unit
RAO	Remedial Action Objective
ROD	Record of Decision
RWQCB	Regional Water Quality Control Board
SWBZ	Shallow Water Bearing Zone
TCE	trichloroethene (also known as trichloroethylene)
ug/l	micrograms per liter

**Explanation of Significant Difference
Institutional Controls for Groundwater Remedy, Site WP-12
Aircraft Control and Warning Site
Mather, California**

1.0 INTRODUCTION

The Aircraft Control and Warning (AC&W) Site, also known as Site WP-12, at the former Mather Air Force Base (Mather), is the site of a groundwater plume of trichloroethene (TCE). The AC&W Record of Decision (ROD) was signed by the Air Force, the U.S. Environmental Protection Agency (EPA) and the State of California in December 1993 (Air Force Base Conversion Agency [AFBCA], 1993) selecting groundwater extraction and treatment as the groundwater remedy. The groundwater remedial action began operating in January 1995, and the plume has been undergoing cleanup since then. The selected cleanup remedy did not include institutional controls (ICs) to prevent exposure to the groundwater or to protect the remedial system. This Explanation of Significant Difference (ESD) has been prepared to document the inclusion of temporary ICs as a component of the AC&W groundwater remedial action until the cleanup objective of 5 micrograms per liter (ug/l) TCE in the aquifer is met for the AC&W groundwater plume. This ESD will become part of the Administrative Record for the AC&W Operable Unit (OU) at Mather; the Administrative Record documents are located at the Air Force Real Property Agency (AFRPA) offices at 3411 Olson Street, McClellan, California 95652.

Mather Parcel G (Figure 1) is planned for transfer to the County of Sacramento for development with the predominant land use at the AC&W Site being used as recreational parkland, and Parcel I-2 with structure is planned for sale to The Lord's Church (formerly known as the Spectrum Christian Center) for use as a church. The Lord's Church is the current lessee. Parcel D-2 was deeded May 1999, for residential use. Portions of Parcel D-1, Parcel D-2, Parcel G, and Parcel I-2 overlie the Installation Restoration Program (IRP) AC&W (Site WP-12) Plume. Air Force leases and future deeds for Parcels G and I-2 will incorporate the ICs as deed restrictions. Parcels D-1 and D-2 have been transferred by deed, and will not have additional ICs applied as a result of this ESD. However, existing deed restrictions for Parcel D-2 include provisions restricting drilling and prohibiting interference with the cleanup, which compliment the ICs established by this ESD. The deed for adjacent Parcel D-1 contains only reservation of access should further investigation or corrective action be necessary.

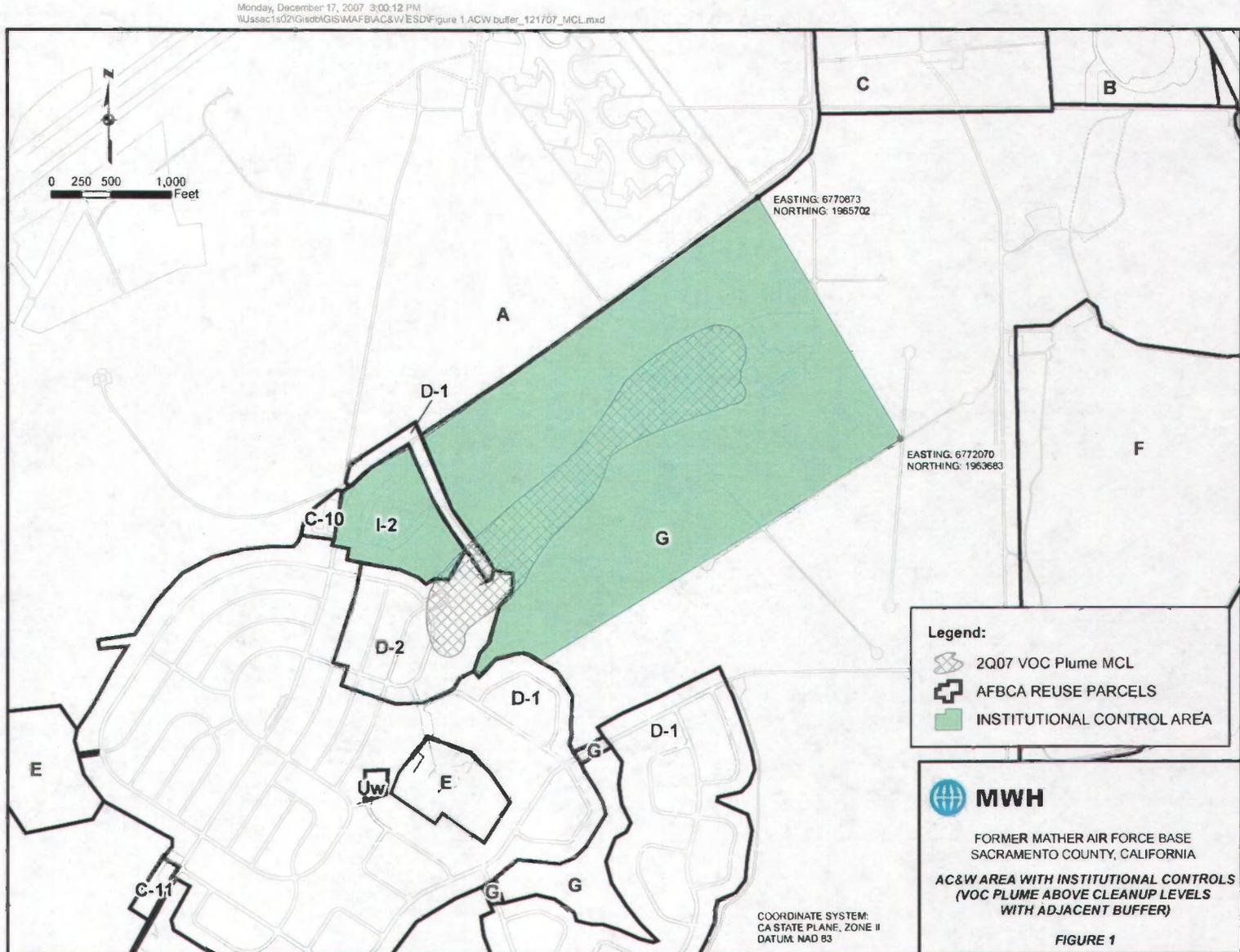


Figure 1. AC&W Area with Institutional Controls

2.0 SITE HISTORY

The AC&W Site is the location of a radar station now operated by the Federal Aviation Administration (FAA) but formerly operated jointly by the FAA and the Air Force. The AC&W Site (IRP Site WP-12) and three nearby sites where underground storage tanks were removed (IRP Sites ST-25, ST-30, and ST-47) make up the AC&W Operable Unit. The location of the AC&W Site and the outline of the plume in relationship to Parcels D-1, D-2, G and I-2 are shown on Figure 1.

The water supply well serving the AC&W area was sampled by the Air Force in 1979 and identified as being contaminated with TCE. The well was sealed in 1993. Investigations in the 1980s revealed a TCE plume extending from the vicinity of the radar site about a mile southeast to the family housing area, predominantly in the upper 60 feet of the aquifer. The maximum concentrations of TCE were about 1 milligram per liter (mg/l).

The AC&W ROD was signed in December 1993 and the remediation using extraction and treatment by air stripping began operating in January 1995. The system was designed to operate at up to 270 gallons per minute (gpm) but only 45 – 65% of this capacity was initially used because the reinjection system could not accommodate the design flow. In June 1997, the treated water was diverted from the injection system to surface water discharge at Mather Lake, in accordance with the 1997 Explanation of Significant Difference (AFBCA, 1997) authorizing and documenting this change. Since then, the system has been operating in the range of 170 to 270 gpm (approximately 165-190 gpm from 2005 through 2007). The influent concentration dropped from about 130 ug/l of TCE during 1995 to approximately 60 ug/l during 1998, to a range of 8 to 18 ug/l in 2005 through 2007.

The State of California is represented by the Department of Toxic Substances Control (DTSC), who in turn coordinates with other State regulatory agencies such as the Central Valley Regional Water Quality Control Board (RWQCB). Throughout this ESD the term "State of California" or "State" is used to refer collectively to the DTSC and RWQCB; communication to the State will be to DTSC who will in turn coordinate with the RWQCB and any other agencies.

3.0 REMEDIAL ACTION FOR THE AC&W OPERABLE UNIT

The selected remedial actions for the AC&W Operable Unit are described in the ROD for the Aircraft Control and Warning Site (AFBCA, 1993), as modified by the 1997 Explanation of Significant Difference (AFBCA, 1997), and are summarized here.

Site WP-12, the Aircraft Control and Warning Site, has a remedy of:

- groundwater extraction;
- treatment by air stripping;
- discharge of treated effluent (i.e., treated water was initially reinjected to the aquifer starting in 1995 in accordance with the ROD, but has been discharged to Mather Lake since 1997 under authority of an ESD (1997)); and,
- adsorption of contaminants from the air (this was required as necessary, but was not triggered because emissions rates did not exceed 2 pounds per day).

Trichloroethene (also known as trichloroethylene, or TCE) is the only contaminant of concern (COC) in the AC&W Plume. The cleanup level for TCE in groundwater is provided in Table 1.

**Table 1:
Cleanup Level for Mather AFB IRP Site WP-12
(established by the 1993 Record of Decision)**

IRP Site Number	Contaminant(s) of Concern	Cleanup Standard (Maximum Contaminant Level [MCL])
WP-12	<i>Groundwater</i> Trichloroethene (TCE)	5 ug/l

Sites ST-25, ST- 20, and ST-47 were underground storage tank sites included in the AC&W Operable Unit, for which the ROD required no further action (NFA).

4.0 BASIS FOR THE EXPLANATION OF SIGNIFICANT DIFFERENCE

4.1 Background

The EPA and the State of California each identified concerns about the long-term protectiveness of the AC&W remedy, based on the lack of ICs in the 1993 ROD. Both EPA and the State identified that the inclusion of ICs as part of the selected remedy at Site WP-12 would ensure the remedy is protective. These concerns were expressed by the EPA and State as remedy protectiveness recommendations made during the Second Five-Year Review for Mather (AFRPA, 2004) and more recently as comments on the draft Finding of Suitability to Transfer (FOST) for Parcel G, a portion of which overlays the AC&W Site Plume. The EPA and the State recommend that groundwater ICs for the AC&W Plume be selected in an ESD to ensure that the remedy remains protective in the long term. The selection of groundwater ICs is consistent with current Air Force policy.

4.2 Description of Significant Difference

Originally, ICs were considered, but not selected, in the 1993 ROD as Remedial Alternative 2a, consisting of "Requirements in the property deed to restrict land use by prohibiting installation of wells in the contaminated portion of the Shallow Water-Bearing Zone (SWBZ); or continued Air Force control of the site to prevent public use of the site, thereby eliminating the possibility of installing a water supply well in the contaminated area." (SWBZ is the shallow water-bearing zone, the contaminated horizon in the aquifer). This ESD imposes groundwater ICs as an additional component of the AC&W selected remedy for groundwater.

5.0 INSTITUTIONAL CONTROLS

Figure 1 shows the extent of the AC&W plume exceeding the TCE MCL as of second quarter 2007, and the IC boundary that outlines the areas within which ICs are hereby applied (i.e., the Institutional Control Area). The area with ICs includes property currently owned by the Federal government above the plume as well as a perimeter buffer zone adjacent to the plume.

The Institutional Control Area includes all of the groundwater remedial system (e.g., extraction wells, monitoring wells, piping, treatment plant) on property owned by the Air Force and is therefore adequate to protect all remedial equipment or systems on this property. The inclusion of the buffer zone adjacent to the plume area provides additional protection from any new well that could either result in significant exposure to TCE or significant interference with the groundwater cleanup. A hypothetical new well is only likely to draw contaminants from the AC&W plume if it induces a capture zone in the so-called SWBZ that extends into the plume, and the new well would only disrupt the remedy if it had a capture zone extending significantly into the plume. The SWBZ will not support a pumping rate in a conventional well much above that pumped by the AC&W extraction wells, and the buffer zone has been created so that all points in the plume are closer to existing Air Force extraction wells than to the buffer margin.

5.1 *Implementation of Institutional Controls*

The IC alternative includes enforceable use restrictions in the form of ICs on the use of certain properties. Specific language is included in this ESD describing the responsibility of the Air Force for implementing, maintaining, monitoring, and enforcing the ICs. Although the Air Force is transferring responsibilities to the transferee and its successors by provisions to be included in the deed(s) transferring title to the property and may contractually arrange for third parties to perform any and all of the actions associated with the ICs, the Air Force is ultimately responsible for the remedy (including ICs) before and after property transfer. The Air Force will exercise this responsibility in accordance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Contingency Plan (NCP). Therefore, compliance with the terms of this ESD will be protective of human health and the environment. Because the restrictions are specifically described below and the means for implementing the restrictions are detailed herein, it is not necessary for the Air Force to submit any new post-ROD, IC implementation documents, such as a Land Use Control Implementation Plan, new operation and maintenance plans, or remedial action work plan.

ICs are non-engineering, non-technical mechanisms used to reduce or prevent human exposure to contaminants. Because these ICs are a part of the selected remedies for the AC&W plume cleanup, they have associated Remedial Action Objectives (RAOs) until the remedy is complete. The RAOs for these ICs are: 1) preventing human exposure to groundwater with concentrations of TCE exceeding the MCL cleanup level of 5 ug/l; 2) protecting the integrity of the remedial system(s) including the associated monitoring system; and, 3) protecting necessary access to the remedial system(s) including the associated monitoring system. The specific ICs involve covenants that prohibit: 1) installing any wells for the extraction of groundwater from affected properties for any purpose other than remediation or monitoring; 2) constructing or creating any groundwater recharge area, unlined surface impoundments, or disposal trenches that cause the alteration of groundwater conditions; 3) conducting or allowing others to conduct activities that would cause disturbance of any systems, equipment, or components of systems associated with groundwater remediation or monitoring; and, 4) conducting or allowing others to conduct activities that would limit access to any systems, equipment, or components of systems associated with groundwater remediation or monitoring.

Meeting the RAOs shall be the primary and fundamental indicator of IC performance, the ultimate aim of which is to protect human health and the environment. Performance measures for the ICs are the RAOs plus the actions necessary to achieve those objectives. It is anticipated that successful implementation, operation, maintenance, and completion of these measures will achieve protection of human health and the environment and compliance with all legal requirements.

The Air Force may contractually arrange for third parties to perform any and all of the actions associated with the ICs, although the Air Force is ultimately responsible under CERCLA for the successful implementation of ICs, including monitoring, maintenance, and review of the ICs. Maintenance, monitoring, and other controls as established in accordance with this ESD and the appropriate transfer documents will be continued until the ICs are no longer necessary. ICs shall be maintained until the concentration of hazardous substances in the groundwater is at such levels as to allow for unrestricted use and exposure.

5.2 Restrictions Prior to Property Transfer

The sites for which ICs are being selected are currently leased by the Air Force. During the time between the adoption of this ESD and deeding of the property, equivalent restrictions will be implemented pursuant to the terms of the existing lease which requires the approval of the Air Force. The lease restrictions are in place and operational and will remain in place until the property is transferred by deed. At the time of deed transfer, lease restrictions will be superseded by equivalent use restrictions to be included in the federal deed.

5.3 *Deed Restrictions and Reservation of Access*

The Federal deed(s) for any parcels in the Institutional Control Area will include a description of the residual contamination on the property, consistent with the Air Force's obligations under CERCLA Section 120(h) and the specific restrictions set forth in this Section. The Federal deeds may require additional specific restrictions from decision documents addressing other residual contamination on the property. ICs in the form of deed environmental restrictive covenants are "environmental restrictions" under California Civil Code Section 1471 (Section 1471). The deeds will include a legal description of the property to which the ICs apply and will contain the provisions required by Section 1471 to qualify the ICs as "environmental restrictions" so that they run with the land.

The Air Force and regulatory agencies may conduct inspections of the ICs and the affected property. The deeds will also contain a reservation of access to the property for the Air Force, the EPA, and the State of California and their respective officials, agents, employees, contractors and subcontractors for purposes consistent with the Air Force IRP or the Federal Facility Agreement (FFA). The Air Force will provide such access to regulatory agencies prior to transfer.

The environmental restrictions are the basis for part of the CERCLA Section 120(h)(3) covenant that the United States is required to include in the deed for any property that has had hazardous substances stored for one year or more or known to have been released or disposed of on the property.

For any deed (conveyance to a non-Federal entity) transferring all or part of any parcel in the Institutional Control Area, ICs in the form of environmental restrictive covenants will be incorporated in the deed as a grantee covenant, in substantially the following language:

- *Grantee covenants for itself, its successors and assigns that it will not install wells or extract groundwater from the Property for any purpose other than remediation or monitoring, unless specifically approved by the Air Force, U.S. EPA, and the State of California;*
- *Grantee covenants for itself, its successors and assigns that it will not cause alteration of groundwater conditions beneath the Property through activities such as construction or creation of any groundwater recharge area, unlined surface impoundments, or disposal trenches, unless specifically approved by the Air Force, U.S. EPA, and the State of California;*

- *Grantee covenants for itself, its successors and assigns not to disturb, destroy, tamper with or alter the groundwater remedial equipment or systems, including but not limited to the components identified in Figure 2, or impede or impair the groundwater remediation activities without the written approval of the Air Force, US. EPA, and the State of California;*

and

- *Grantee covenants for itself, its successors and assigns to prohibit any activities that would limit access to, or interfere with, the groundwater remedial equipment or systems, including but not limited to the components identified in Figure 2 without the written approval of the Air Force, U.S. EPA, and the State of California.*

Monday, December 17, 2007 3:03:12 PM
 W:\ssac\150210\96\GIS\MAF\AC&W\ESD\Figure 2 AC&W Site Map 12x1707.mxd

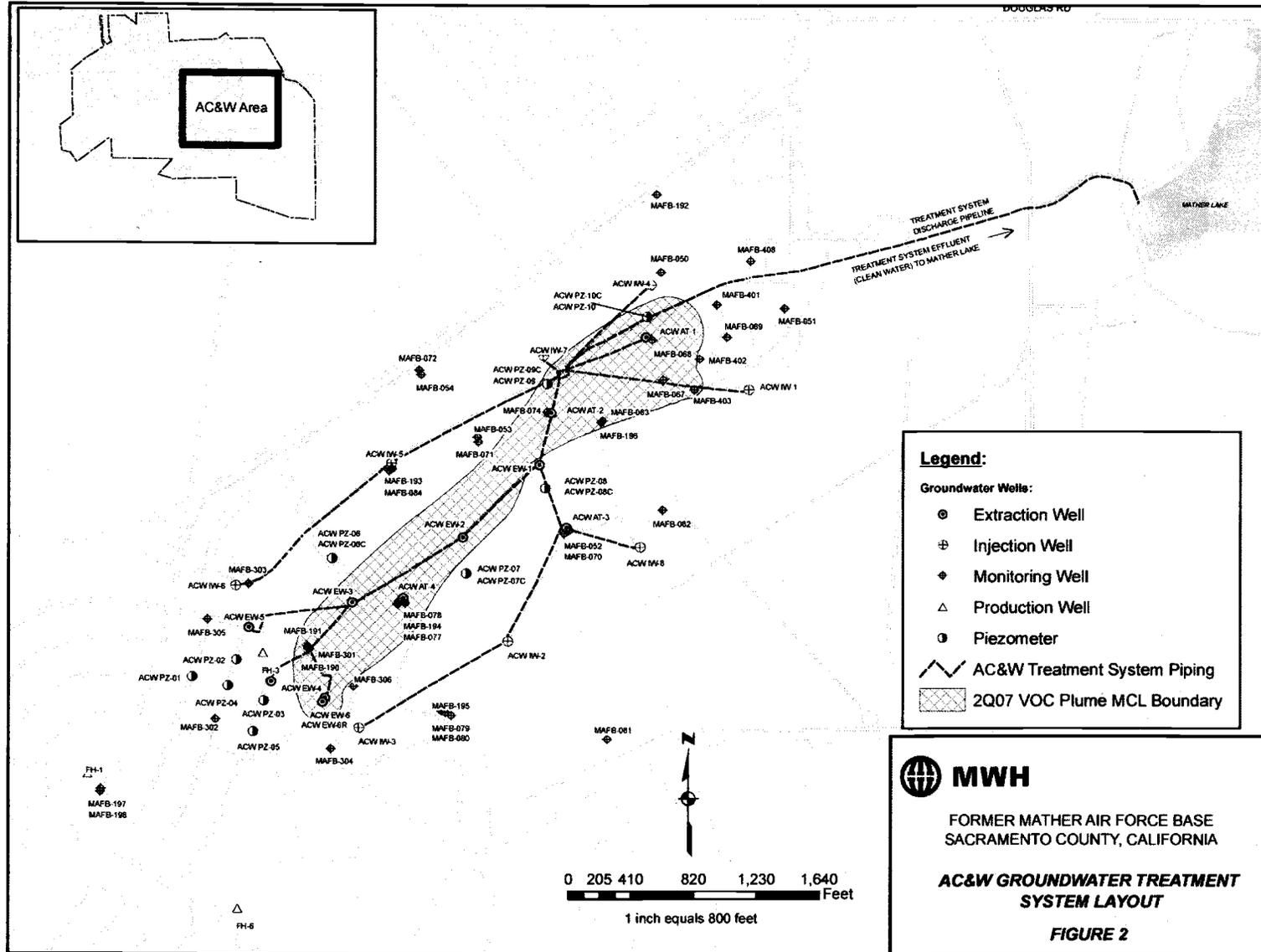


Figure 2. AC&W Groundwater Treatment System Layout

5.4 *Notice of Institutional Controls*

The Air Force will include the specific deed restriction language set forth in this ESD in the deed for any parcels in the Institutional Control Area, and will provide a copy of the deed or other transfer documentation containing the use restrictions to the regulatory agencies as soon as practicable after transfer of fee title. The Air Force will inform the property owner(s) of the necessary ICs in the draft deed. Concurrent with the transfer of fee title from the Air Force to the transferee, the Finding of Suitability for Transfer or the Finding of Suitability for Early Transfer and the location of the Administrative Record file will be communicated in writing to the property owners and to appropriate state and local agencies (with a copy to EPA) with authority regarding any of the activities or entities addressed in the controls to ensure that such agencies can factor the information into their oversight, approval, and decision-making activities regarding the property.

Prior to conveyance of any Air Force parcel in the Institutional Control Area, EPA and the State representatives will be given reasonable opportunity to review and comment on the applicable deed language described in this section and associated rights of entry for purposes of IC oversight and enforcement.

The Air Force will provide notice to EPA and the State at least six (6) months prior to any transfer or sale of property. If it is not possible for the facility to notify EPA and the State at least six months prior to any transfer or sale, then the facility will notify EPA and the State as soon as possible but no later than 60 days prior to the transfer or sale of any property subject to ICs. Additionally, the Air Force further agrees to provide EPA and the State with similar notice, within the same time frames, as to federal-to-federal transfers of property.

5.5 *Annual Evaluations/Monitoring*¹

Prior to property transfer, the Air Force will conduct annual monitoring, provide annual reports describing whether property use has conformed to ICs or use restrictions, and undertake prompt action to address activity that is inconsistent with the IC RAOs or use restrictions, or any action that may interfere with the effectiveness of the ICs. The monitoring results will be included in a separate report or as a section of another environmental report, if appropriate, and provided to

¹ If the transferee executes a State Land Use Covenant with DTSC, then the provisions in that document shall supersede and/or supplement the discussions concerning IC evaluations/monitoring (section 5.5), responses to violations (section 5.6), and approval of modifications/releases (section 5.7).

the EPA and the State. The annual monitoring reports will be used in preparation of the Five Year Review to evaluate the effectiveness of the remedy. Prior to transfer, the annual monitoring report submitted to the regulatory agencies by the Air Force will evaluate the status of the ICs and how any IC deficiencies or inconsistent uses have been addressed.

Upon the effective date of property conveyance, the transferee (or other entity accepting such obligations [which may include, without limitation, subsequent transferees] or subsequent property owners) will conduct annual physical inspections of parcels in the Institutional Control Area to confirm continued compliance with all IC RAOs unless and until the ICs at the site are terminated. The transferee or subsequent property owner(s) will provide to the Air Force, the EPA, and the State an annual monitoring report on the status of the ICs and how any IC deficiency or inconsistent uses have been addressed, whether use restrictions and controls were communicated in the deed(s) for any property transferred in the reporting period, and whether use of the property encompassing the area subject to ICs has conformed to such restrictions and controls. The Air Force will place these transferee obligations in the deed or other transfer documentation.

If a transferee fails to provide an annual monitoring report as described above to the Air Force, the Air Force will notify EPA and the State as soon as practicable. Within 30 days of the report's due date, the Air Force will take steps to determine whether ICs are effective and remain in place and advise the regulators of its efforts. In any event, within 90 days of the report's due date, the Air Force shall determine the status of ICs and provide its written findings, with supporting evidence sufficient to confirm the reported status, based on the use restrictions/ICs and site conditions, to EPA and the State unless either EPA or the State, in its sole discretion, acts to confirm the status of the ICs independently.

The five-year reviews conducted by the Air Force will also address whether the ICs in this ESD were inserted in the deed, if property was transferred during the period covered; whether the owners and State and local agencies were notified of the ICs affecting the property, and whether use of the property has conformed to such ICs. Five-year reviews will make recommendations on the continuation, modification, or elimination of annual reports and IC monitoring frequencies. Five-year reviews are submitted by the Air Force to the regulatory agencies for review and comment.

Although the Air Force is transferring procedural responsibilities to the transferee and its successors by provisions to be included in the deed(s) transferring title to the parcels in the Institutional Control Area and may contractually arrange for third parties to perform any and all of the actions associated with the ICs, the Air Force is ultimately responsible for the remedy.

5.6 Response to Violations

Prior to property transfer, the Air Force will notify EPA and the State as soon as practicable but no longer than 10 days after discovery of any activity that is inconsistent with the IC RAOs or use restrictions, or any other action that may interfere with the effectiveness of the ICs. The Air Force will notify the EPA and the State regarding how the Air Force has addressed or will address the breach within 10 days of sending EPA and the State notification of the breach.

The deed will require that post-transfer, the transferee will notify the Air Force, the EPA, and the State of any activity that is inconsistent with the IC RAOs or use restrictions, or any other action that may interfere with the effectiveness of the ICs, and will address such activity or condition as soon as practicable, but in no case will the process be initiated later than 10 days after the transferee becomes aware of the breach. Post-transfer, if the transferee fails to satisfy its obligations in the deed or other transfer documentation, the Air Force will enforce such obligations against the transferee. If there is failure of the selected remedy or a violation of selected remedy obligations (for example, an activity inconsistent with IC RAOs or use restrictions, or any action that may interfere with the effectiveness of the ICs), the Air Force will notify other parties to the FFA in writing of such failure as soon as practicable (but no longer than 14 days) upon discovery of the inconsistent activity or action that interferes with the effectiveness of the IC, and initially seek corrective action or other recourse from the transferee. If, after diligent efforts, the Air Force is unable to enforce the obligations in the deed or other transfer documentation, or remedy obligations against the transferee, within 21 days following the Air Force's notification, the parties shall confer to discuss re-implementation of the selected remedy or other necessary remedial actions to address the breach of the IC. If the transferee is unwilling or unable to undertake the remedial actions, the Air Force will within 10 days inform the other Parties of measures it will take to address the breach.

5.7 Approval of Modification or Release of Institutional Controls

Prior to transfer, the Air Force shall not modify or terminate ICs or implementation actions, or modify land use restrictions that are part of the selected remedy without approval by EPA and the State. The Air Force shall seek prior concurrence before any anticipated action that may disrupt the effectiveness of the IC or any action that may alter or negate the need for ICs.

Any grantee of property constrained by the ICs imposed through their transfer document(s) may request modification or termination of an IC. Modification or termination of an IC requires the Air Force, EPA, and State approval.

5.8 Adjacent Deeded Parcels Overlying the Plume

Parcels D-1 and D-2 have already been transferred from the Air Force. The deed for Parcel D-1, which contains some property overlying the AC&W Plume, does not contain deed restrictions prohibiting drilling. Drilling restrictions and reservation of access are contained in the deed for Parcel D-2, which includes the portion of the housing area above the AC&W Plume. The deed restriction is consistent with the ICs established by this ESD for Parcels G and I-2 as an integral part of the remedy for the AC&W Plume. The deed language transferring Parcel D-2 from the United States of America to the Local Redevelopment Agency of the County of Sacramento contains the following restriction:

8.b. Water Well Restrictions. The GRANTEE covenants and agrees for itself, its successors and assigns, and every successor in interest to the Property herein described, or part thereof, that it shall not construct or permit to be constructed any well or other structure, and shall not use such well or other structure for recharge or to extract, utilize, consume or permit to be extracted, and water from the aquifer below the surfaces of the ground within the boundary of the Property for the purpose of human consumption, or other use, unless such groundwater has been tested and found to meet all standards for human consumption, or such other use, and such owner or occupant shall first have obtained the prior written approval of the GRANTOR, with concurrence from the U.S. Environmental Protection Agency, California Department of Toxic Substance Control, and California Regional Water Quality Control Board, Central Valley Region. The costs associated with obtaining use of such water, including, but not limited to, the costs of permits, studies, analysis or remediation, shall be the sole responsibility of the owner, its successors and assigns, without any cost whatsoever to the United States.

6.0 STATUTORY DETERMINATIONS

The selected remedy is protective of human health and the environment and complies with Federal and State requirements that are legally applicable, relevant and appropriate to the remedial action, and are cost effective.

The groundwater extraction and treatment part of the AC&W groundwater remedy utilizes permanent solutions and alternate treatment technologies to the maximum extent practicable for this site. The IC component added to the remedy by this ESD does not change this determination.

Because this remedy will result in contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure, a review will be conducted within five years after initiation of remedial action to ensure that the remedy is, or will be, protective of human health and the environment.

7.0 PUBLIC PARTICIPATION ACTIVITIES

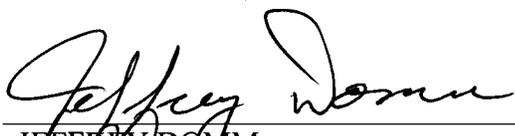
Although the remedy is modified from the original decision document, the modification is not a fundamental change of the scope, performance, and/or cost from the original remedy; therefore, a formal comment period will not be conducted. A notice of availability and brief description of this ESD will be published in the *Sacramento Bee* after this ESD is signed. The ESD will become a part of the Administrative Record for the AC&W OU at Mather.

8.0 ESD SIGNATURE PAGE

This ESD for Site WP-12 is final and will be made available to the public by placement in the Administrative Record and information repository [per NCP §§300.435(c)(2)(i)(A) and 300.285(a)(2)].

This AC&W ESD may be executed and delivered in any number of counterparts, each of which when executed and delivered shall be deemed to be an original, but all such counterparts shall together constitute one and the same document.

Decision Statement: The EPA and the Air Force jointly select the remedy augmentation described in this AC&W ESD, consisting primarily of groundwater use restrictions in the form of ICs above a groundwater plume exceeding the MCL and also within a perimeter buffer zone.



JEFFREY DOMM
Acting Director
Air Force Real Property Agency
U.S. Air Force

25 Sep 08

Date



MICHAEL M. MONTGOMERY
Chief, Federal Facilities and Site Cleanup Branch
Region IX, U.S. Environmental Protection Agency

30 Oct. 08

Date

The State of California Department of Toxic Substances Control (DTSC), and California Central Valley Regional Water Quality Control Board (RWQCB) had an opportunity to review and comment on this AC&W ESD.



DANIEL T. WARD, P.E.
Supervising Hazardous Substances Engineer I
Sacramento Office
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
California Environmental Protection Agency

7 Nov 08

Date

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