



**MATHER AFB
CALIFORNIA**

**ADMINISTRATIVE RECORD
COVER SHEET**

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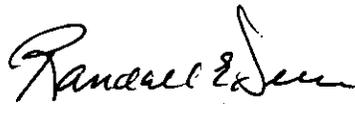
29 Oct 96

MEMORANDUM FOR DISTRIBUTION

FROM: AFBCA/DBM
10503 Armstrong Avenue
Mather, CA 95655

SUBJECT: Transmittal of the Draft Final Explanation of Significant Difference (ESD) to the Landfill OU ROD for Consolidation of Additional Refuse & Debris into Landfill Site 4

1. Transmitted by copy of this letter please find the subject documents for your review. No formal comments were received on the Draft ESD. However, minor changes were made to remove references to the AC&W OU, to mention the removal action memoranda for sites 2 and 10C, and to mention the potential benefits for re-use of the sites from which refuse has been removed.
2. Questions should be addressed to Bill Hughes at (916) 364-4007.

for 
ANTHONY C. WONG
BRAC Environmental Coordinator

Attachment: Draft Final ESD

DISTRIBUTION

U.S. EPA, Region IX, Attn: Debbie Lowe (H-9-1) (2 copies)
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Sacramento County, Attn: Randall Yim
URS, Attn: Wellington Yee
Montgomery Watson, Attn: John Scott

Landfill Operable Unit
Mather AFB, California

**Draft Final Explanation of Significant Difference
from the Record of Decision**

Consolidation of Additional Refuse & Debris into Landfill Site 4

24 October 1996

AFBCA/DBM
10503 Armstrong Avenue
Mather, CA 95655
(916) 364-4000

1. Introduction

This decision document presents an explanation of significant difference (ESD) from the Final Record of Decision (ROD) for the cleanup of the Landfill Operable Unit (OU) at Mather Air Force Base, California [U.S. Air Force, 1995]. The ESD is developed in accordance with the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments Reauthorization Act of 1986 (SARA) and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Under Section 117 (c) of CERCLA an ESD is required when significant (but not fundamental to the remedy selected in the ROD) changes are made to the final remedial action as described in the record of decision. This ESD follows recommendations in the US Environmental Protection Agency Guide to Addressing Pre-ROD and Post-ROD Changes [EPA, 1991].

The United States (US) Air Force is the owner of the Landfill OU sites, and of Site 69, the source site of additional refuse/debris, and has been delegated authority by executive order to provide the necessary remedial action consistent with the NCP and CERCLA Section 104. The US EPA Region IX and State of California provide regulatory support and concurrence for the investigations and cleanup activities through the Mather AFB Federal Facilities Agreement [US Air Force 1989]. The Department of Toxic Substances Control represents the State of California and is responsible for coordinating among other state agencies to ensure compliance with appropriate California laws and regulations. Both the US EPA and State of California concur with this ESD.

The debris consolidation activity described by this ESD was proposed by the Air Force based upon information that became available as the Landfill remedial actions were underway. The need for this ESD was determined by the Air Force, the U.S. EPA, and the State of California, as documented in a consensus statement signed on August 15; a copy of the consensus statement is an attachment to this ESD. The consensus agreement acknowledged that consolidation activities would proceed prior to issuance of the ESD in order that consolidation occur during the operating period of Site 4.

Upon finalization, this ESD will become a part of the Administrative Record for the Landfill Operable Unit as required in the NCP 300.825 (a)(2). The Administrative Record is located at 10503 Armstrong Ave, Mather, CA, and is open for inspection by the public between the hours of 7:30 a.m. to 4:30 p.m. The document is also located at an off-site public repository at the Rancho Cordova Community Library. The library is located at 9845 Folsom Boulevard, Sacramento 95827, and is open Tuesday from 1:00 p.m. to 8:00 p.m.; Wednesday 11:00 a.m. to 6:00 p.m.; Thursday 11:00 a.m. to 8:00 p.m.; and Friday and Saturday 1:00 to 5:00 p.m.. A public comment period is not required for this ESD; however the Air Force is notifying the public of the availability of the ESD for the Landfill OU ROD in a fact sheet and a notice in the Sacramento Bee and the Grapevine Independent Newspaper.

2. Site Background

This section provides a brief description of the sites addressed by this ESD. Further details can be found in the ROD and in the Administrative Record. In addition, please note that similar consolidation activities for the remainder of Site 2 refuse and for refuse from Site 10C are documented by time-critical removal action memoranda issued on September 6 and 16, 1996, respectively.

Site 2, 8150 Area Landfill, source of some refuse/debris to be consolidated into Site 4 under this ESD

Site 4, Northeast Perimeter Landfill No. 2, the landfill consolidation site;

Site 69, Ordnance Burning/ Ordnance Disposal Pit, source of some refuse/debris to be consolidated into Site 4 under this ESD

2.1 Site Description and History

Mather AFB is an inactive military facility located approximately 10 miles east of Sacramento in Sacramento County, California, as shown in Figure 1. Mather AFB closed on 30 September 1993, under the Base Realignment and Closure Act. At the time of closure the base encompasses 5845 acres in an unsurveyed part of Township 8 North, Ranges 6 East and 7 East. Since closure portions of base have undergone reuse under long-term lease to Sacramento County for a regional park and continued use of the airfield and flight line for general aviation.

2.1.1 Site 2, 8150 Area Landfill

Site 2 was the main sanitary landfill for Mather AFB from 1942 to 1950. The extent of buried refuse at this site was still uncertain at the time the Record of Decision was issued. The areal extent was estimated based upon geophysics and trench excavations, as described in the Focused Feasibility Study (IT, 1993). Limited additional trenching was conducted as part of the Project Definition Investigation (Montgomery Watson, 1996). During the initial stages of remedial action, it appeared that some shallow refuse occurring in a drainage course would be better removed to avoid inundation during precipitation events, but that the consolidation within Site 2 might cause other difficulties (see below). The area is shown on Figure 2.

2.1.2 Site 4, Northeast Perimeter Landfill No. 2:

Site 4 was the main sanitary landfill for Mather AFB from 1967 to 1971. It has the largest areal extent of Mather's landfills. This is the primary reason it was selected as a consolidation site for the Landfill OU remedial actions.

2.1.4 Site 69, Ordnance Burning/ Ordnance Disposal Pit:

Site 69 was used to incinerate unwanted ordnance and other combustible items. A furnace and a disposal pit were located at either end of a large flat rectangular area surrounded by sides that sloped upward to a height of about 5 - 10 feet. The site also contained a drainage channel that exited the southwest side of the area and drained into a tributary of Morrison Creek.

Pre-ROD investigations and post-ROD characterization for these sites are reported in:

1. IRP Records Search for Mather AFB, Phase I, June 1982 (CH₂M-Hill Inc. 1982);
2. IRP Phase II Confirmation/Quantification, Stage 1 Investigation, June 1986 (Weston 1986);
3. IRP Phase II Confirmation/Quantification, Stage 3 Investigation, February 1988 (AeroVironment 1988);
4. IRP Site Inspection Report, August 1990 (IT 1990);
5. Remedial Investigation Report for Group 2 Sites (IT Corp, 1993a)
6. Landfill Operable Unit Focused Feasibility Study Report (IT Corp, 1993b)
7. Landfill Operable Unit Project Definition Investigation Report (Montgomery Watson, 1996)

2.2 Description of the Selected Remedy

The selected remedies for Site 2 and for Site 4 addressed the potential threat to human health posed by contaminants of concern at these sites by constructing caps over the two landfills to limit the exposure pathways at the sites and the potential for migration of contamination from the buried refuse through the vadose zone to groundwater. The alternative selected for Site 4 included operating Site 4 as an active landfill to consolidate refuse from other landfills at sites 5 & 6, and then closing Site 4 with construction of a prescriptive cap with passive gas venting. The alternative selected for site 2 consisted of construction of a vegetative cap with passive gas venting.

3. Description of Significant Change to the Selected Remedy

This ESD changes one portion of the ROD. To the extent that this ESD differs from the ROD, it supersedes it.

The only change to the selected remedies in the Landfill Operable Unit Record of Decision is the consolidation of refuse/debris from a portion of Site 2 and from Site 69 into Site 4 prior to capping Site 4. The incorporation of soils from Site 69 was addressed in the Record of Decision for the Soils Operable Unit Sites and the Groundwater Operable Unit Plumes (USAF, 1996), but the refuse/debris was not explicitly mentioned.

The consolidation from Site 2 to Site 4 was proposed because it was deemed less effective to cap waste underlying a drainage channel than to consolidate the refuse, and it appeared that consolidation within Site 2 would cause the planned cap elevation to encroach upon the height of overhead power lines, thereby incurring additional cost and complications installing taller utility poles or relocating the overhead lines. After this consolidation occurred, it was discovered that there was less refuse present in the remainder of the site, and full consolidation of the refuse into Site 4 was undertaken under a time-critical removal action memorandum (RAM) dated 6 September 1996. The enhanced potential for redevelopment of this area was a factor in the decision to remove the remainder of the refuse under the RAM.

About 9000 cubic yards of soil estimated to contain less than one percent debris were excavated from Site 69 from 8/30/96 to 9/5/96. The debris consisted of wood recently abandoned at the site, some concrete rubble from the foundation for the furnace, and some small metallic debris such as starter cartridges used for B-52 engines.

About 2000 cubic yards of soil and debris were removed from the drainage swale at Site 2 in late August 1996. The soil contained construction debris in the upper foot and glass as deep as three feet. The debris/ refuse was estimated to be about 25% of the excavated material.

3.1 Compliance with Applicable or Relevant and Appropriate Requirements

No additional Applicable or Relevant and Appropriate Requirements (ARARs) are invoked by this action; as described in the attached consensus statement, the waste acceptance criteria established in the Landfill OU ROD for Site 4 remain applicable for this additional consolidation action, as well as the requirements for excavation and transportation of wastes that are contained in the landfill closure plans for sites 5 and 6.

4.0 Statutory Determinations

Considering the changes made to the selected remedial action within this ESD, the Air Force, US EPA, and the State of California believe that the remedies for sites 2 and 4 remain protective of human health and the environment, comply with federal and state requirements that were identified in the ROD as applicable or relevant and appropriate to this remedial action, and are cost-effective. In addition, the revised remedial action uses permanent solutions and alternative treatment technologies to the maximum extent practical

for this site. The change contained herein is significant, but does not fundamentally change the remedy.

5.0 Signatures:

Alan K. Olsen
Director
Air Force Base Conversion Agency

Date

Dan O'Palski
Chief, Federal Facility Cleanup Office
US Environmental Protection Agency, Region IX

Date

Anthony J. Landis
DSMOA Technical Program Manager
California Department of Toxic Substances Control

Date

6.0 References

- AeroVironment Inc, 1988, IRP Phase II Confirmation/Quantification, Stage 3 Investigation, February 1988.
- CH₂M-Hill Inc., 1982, IRP Records Search for Mather AFB, Phase 1, June 1982.
- IT Corp, 1990 (International Technologies Corporation), IRP Site Inspection Report, August 1990.
- IT Corporation, 1993a, Remedial Investigation Report for Group 2 Sites, April 1993
- IT Corporation, 1993b, Landfill Operable Unit Focused Feasibility Study Report, October 1993
- Montgomery Watson, 1996, Landfill Operable Unit Project Definition Investigation Report, April 1996
- Roy F. Weston Inc, 1986, IRP Phase II Confirmation/Quantification, Stage 1, Investigation Report, June 1986.
- US Air Force, 1989, Federal Facility Agreement, July 21, 1989
- US Air Force, 1995, Record of Decision: Landfill Operable Unit, July 1995.
- US Air Force, 1996, Removal Action Memorandum, Landfill Operable Unit, "8150" Area Landfill, Time-Critical Removal, September 1996.
- US Air Force, 1996, Removal Action Memorandum, Basewide Operable Unit Site 10C: Fire Training Area #3, Time-Critical Removal, September 1996.
- US EPA, 1991, Guide to Addressing Pre-ROD and Post-ROD Changes, April 1991.

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