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**MATHER AFB  
CALIFORNIA**

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**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 1830

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

AND THE

STATE OF CALIFORNIA

AND THE

UNITED STATES AIR FORCE

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)

IN THE MATTER OF: )

)

The U.S. Department )

of the Air Force )

)

Mather Air Force Base )

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Federal Facility

Agreement Under

CERCLA Section 120

Administrative

Docket Number:

Interagency Agreement  
Mather Air Force Base

TABLE OF CONTENTS

1.	Purpose . . . . .	2
2.	Parties . . . . .	4
3.	Jurisdiction . . . . .	5
4.	Definitions . . . . .	6
5.	Determinations. . . . .	9
6.	Work to be Performed. . . . .	.11
7.	Consultation: Review and Comment Process for Draft and Final Documents . . . . .	.12
8.	Deadlines. . . . .	.18
9.	Extensions . . . . .	.20
10.	Force Majeure . . . . .	.22
11.	Emergencies and Removals . . . . .	.23
12.	Dispute Resolution . . . . .	.26
13.	Enforceability . . . . .	.29
14.	Stipulated Penalties . . . . .	.30
15.	Funding. . . . .	.32
16.	Exemptions . . . . .	.33
17.	Statutory Compliance/RCRA-CERCLA Integration . . . . .	.34
18.	Project Managers . . . . .	.35
19.	Permits. . . . .	.37
20.	Quality Assurance. . . . .	.38
21.	Notification . . . . .	.39
22.	Data and Document Availability . . . . .	.40
23.	Release of Records . . . . .	.41
24.	Preservation of Records. . . . .	.42
25.	Access to Federal Facility . . . . .	.43
26.	Public Participation and Community Relations . . . . .	.45
27.	Five Year Review . . . . .	.46
28.	Transfer of Real Property. . . . .	.47
29.	Amendment or Modification of Agreement . . . . .	.48
30.	Termination of the Agreement . . . . .	.49
31.	Covenant Not To Sue and Reservation of Rights. . . . .	.50
32.	Other Claims . . . . .	.51
33.	Recovery of EPA Expenses . . . . .	.52
34.	State Support Services . . . . .	.53
35.	State Participation Contingency. . . . .	.57
36.	Effective Date and Public Comment. . . . .	.58
37.	Base Closure . . . . .	.59
38.	Appendices and Attachments . . . . .	.60

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 9  
 AND THE  
 STATE OF CALIFORNIA  
 AND THE  
 UNITED STATES AIR FORCE

IN THE MATTER OF:	)	
	)	Federal Facility
The U.S. Department	)	Agreement Under
of the Air Force	)	CERCLA Section 120
	)	
Mather Air Force Base	)	Administrative
	)	Docket Number:

Based on the information available to the Parties on the effective date of this federal facility agreement (Agreement), and without trial or adjudication of any issues of fact or law, the Parties agree as follows:

1. PURPOSE

1.1 The general purposes of this Agreement are to:

- (a) Ensure that the environmental impacts associated with past and present activities at the Site are thoroughly investigated and appropriate remedial action taken as necessary to protect the public health, welfare and the environment;
- (b) Establish a procedural framework and schedule for developing, implementing and monitoring appropriate response actions at the Site in accordance with CERCLA, the NCP, Superfund guidance and policy, RCRA, RCRA guidance and policy, and applicable State law; and
- (c) Facilitate cooperation, exchange of information and participation of the Parties in such action.

1.2 Specifically, the purposes of this Agreement are to:

- (a) Identify operable unit (OU) alternatives which are appropriate at the Site prior to the implementation of final remedial action(s) for the Site. OU alternatives shall be identified and proposed to the Parties as early as possible prior to formal proposal of OUs to EPA and the State pursuant to CERCLA and applicable State law. This process is designed to promote cooperation among Parties in identifying OU alternatives prior to the final selection of Operable Units;

(b) Establish requirements for the performance of an RI to determine fully the nature and extent of the threat to the public health or welfare or the environment caused by the release and threatened release of hazardous substances, pollutants, or contaminants at the Site and to establish requirements for the performance of an FS for the Site to identify, evaluate, and select alternatives for the appropriate remedial action(s) to prevent, mitigate, or abate the release or threatened release of hazardous substances, pollutants, or contaminants at the Site in accordance with CERCLA and applicable State law;

(c) Identify the nature, objective, and schedule of response actions to be taken at the Site. Response actions at the Site shall attain that degree of cleanup of hazardous substances, pollutants or contaminants mandated by CERCLA and applicable State law;

(d) Implement the selected remedial actions(s) in accordance with CERCLA and applicable State law and meet the requirements of CERCLA Section 120(e)(2), 42 U.S.C. Section 9620(e)(2), pertaining to interagency agreements;

(e) Assure compliance, through this Agreement, with RCRA and other federal and State hazardous waste laws and regulations for matters covered herein;

(f) Coordinate response actions at the Site with the mission and support activities at Mather AFB;

(g) Expedite the cleanup process to the extent consistent with protection of human health and the environment;

(h) Provide for State involvement in the initiation, development, selection and enforcement of remedial actions to be undertaken at Mather AFB, including the review of all applicable data as it becomes available and the development of studies, reports, and action plans; and to identify and integrate State ARARS into the remedial action process; and

(i) Provide for operation and maintenance of any remedial action selected and implemented pursuant to this Agreement.

## 2. PARTIES

2.1 The Parties to this Agreement are EPA, the Air Force, and the State of California. The terms of the Agreement shall apply to and be binding upon EPA, the State of California, and the Air Force.

2.2 This Agreement shall be enforceable against all of the Parties to this Agreement. This Article shall not be construed as an agreement to indemnify any person. The Air Force shall notify its agents, members, employees, response action contractors for the Site, and all subsequent owners, operators, and lessees of the Site of the existence of this Agreement.

2.3 Each Party shall be responsible for ensuring that its contractors comply with the terms and conditions of this Agreement. Failure of a Party to provide proper direction to its contractors and any resultant noncompliance with this Agreement by a contractor shall not be considered a Force Majeure event or other good cause for extensions under Section 9 (Extensions), unless the Parties so agree. The Air Force will notify EPA and the State of the identity and assigned tasks of each of its contractors performing work under this Agreement upon their selection.

2.4 The Department of Health Services (DHS) is the designated single State agency, in accordance with California Government Code Section 12018, and Health and Safety Code Section 25159.7, responsible for the federal programs to be carried out under this Agreement, and the lead agency for the State of California.

### 3. JURISDICTION

3.1 Each Party is entering into this Agreement pursuant to the following authorities:

(a) The U.S. Environmental Protection Agency (EPA), enters into those portions of this Agreement that relate to the remedial investigation/feasibility study (RI/FS) pursuant to section 120(e)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. Section 9620(e)(1), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Pub. L. 99-499 (hereinafter jointly referred to as CERCLA), and the Resource Conservation and Recovery Act (RCRA) Sections 6001, 3008(h) and 3004(u) and (v), 42 U.S.C. Section 6961, 6928(h), 6924(u) and (v), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA) (hereinafter jointly referred to as RCRA) and Executive Order (EO) 12580;

(b) EPA enters into those portions of this Agreement that relate to operable units and final remedial actions pursuant to CERCLA section 120(e)(2), 42 U.S.C. Section 9620(e)(2), RCRA sections 6001, 3008(h) and 3004(u) & (v), 42 U.S.C. Section 6961, 6928(h), 6924(u) & (v), and Executive Order 12580;

(c) The Air Force enters into those portions of this Agreement that relate to the RI/FS pursuant to CERCLA Section 120(e)(1), 42 U.S.C. Section 9620(e)(1), RCRA Sections 6001, 3008(h) and 3004(u) & (v), 42 U.S.C. Sections 6961, 6928(h), 6924(u) & (v), Executive Order 12580, the National Environmental Policy Act, 42 U.S.C. Section 4321, and the Defense Environmental Restoration program (DERP), 10 U.S.C. Section 2701 et. seq.;

(d) The Air Force enters into those portions of this Agreement that relate to operable units and final remedial actions pursuant to CERCLA section 120(e)(2), 42 U.S.C. Section 9620(e)(2), RCRA Sections 6001, 3004(u) & (v), 3008(h), 42 U.S.C. Section 6961, 6928(h), 6924(u) & (v), Executive Order 12580 and the DERP; and

(e) The California Department of Health Services enters into this Agreement pursuant to CERCLA Sections 120(f) and 121, 42 U.S.C. Sections 9620(f) and 9621, and California Health and Safety Code Sections 102 and 25355.5(a)(1)(C).

#### 4. DEFINITIONS

4.1 Except as noted below or otherwise explicitly stated, the definitions provided in CERCLA, CERCLA case law, and the NCP shall control the meaning of terms used in this Agreement.

(a) "AC&W" shall refer to the Aircraft Control and Warning Site at Mather AFB, as added to the National Priorities List (NPL) by the Environmental Protection Agency (EPA) on July 22, 1987, 52 Federal Register 2760, at page 27624. The site is also referred to as WP02 (Air Force site identification number) and Site 12.

(b) "Agreement" shall refer to this document and shall include all Appendices to this document to the extent they are consistent with the original Agreement as executed or modified. All such Appendices shall be made an integral and enforceable part of this document. Copies of Appendices shall be available as part of the Administrative Record, as provided in subsection 26.3

(c) "Air Force" shall mean U.S. Air Force, its employees, members, agents, and authorized representatives as well as Department of Defense (DOD), to the extent necessary to effectuate the terms of this Agreement, including, but not limited to, appropriations and Congressional reporting requirements.

(d) "ARARS" shall mean federal and State Applicable or Relevant and Appropriate Requirements, standards, criteria, or limitations, identified pursuant to section 121 of CERCLA. ARARs shall apply in the same manner and to the same extent that such are applied to any non-governmental entity, facility, unit, or site, as defined in CERCLA and the NCP. See CERCLA Section 120(a)(1), 42 U.S.C. Section 9620(a)(1).

(e) "CERCLA" shall mean the Comprehensive Environmental Response, Compensation and Liability Act, Public Law 96-510, 42 U.S.C. Section 9601 et. seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499, and any subsequent amendments.

(f) "Days" shall mean calendar days, unless business days are specified. Any submittal that under the terms of this Agreement would be due on Saturday, Sunday, or holiday shall be due on the following business day.

(g) "EPA" shall mean the United States Environmental Protection Agency, its employees and authorized representatives.

(h) "Facility" shall have the same definition as in CERCLA Section 101(9), 42 U.S.C. Section 9601(9).



(i) "Federal Facility" shall include Mather Air Force Base and any real property subject to the jurisdiction of the Commander, 323 Air Base Group.

(j) "Feasibility Study" or "FS" means a study conducted pursuant to CERCLA and the NCP which fully develops, screens and evaluates in detail remedial action alternatives to prevent, mitigate, or abate the migration or the release of hazardous substances, pollutants, or contaminants at and from the Site. The Air Force shall conduct and prepare the FS in a manner to support the intent and objectives of Section 17 (Statutory Compliance/RCRA-CERCLA Integration).

(k) "Meeting," in regard to Project Managers, shall mean an in-person discussion at a single location or a conference telephone call of all Project Managers. A conference call will suffice for an in-person meeting at the concurrence of the Project Managers.

(l) "National Contingency Plan" or "NCP" shall refer to the regulations contained in 40 CFR 300.1 et seq.

(m) "Operable Unit" or "OU" shall have the same meaning as provided in the NCP.

(n) "Operation and maintenance" shall mean activities required to maintain the effectiveness of response actions.

(o) "RCRA" or "RCRA/HSWA" shall mean the Resource Conservation and Recovery Act of 1976, Public Law 94-580, 42 U.S.C. Section 6901 et. seq., as amended by the Hazardous and Solid Waste Amendments of 1984, Public Law 98-616, and any subsequent amendments.

(p) "Remedial Design" or "RD" shall have the same meaning as provided in the NCP.

(q) "Remedial Investigation" or "RI" means that investigation conducted pursuant to CERCLA and the NCP, as supplemented by the substantive provisions of the EPA RCRA Facilities Assessment guidance. The RI serves as a mechanism for collecting data for Site and waste characterization and conducting treatability studies as necessary to evaluate performance and cost of the treatment technologies. The data gathered during the RI will also be used to conduct a baseline risk assessment, perform a feasibility study, and support design of a selected remedy. The Air Force shall conduct and prepare the RI in a manner to support the intent and objectives of Section 17 (Statutory Compliance/RCRA-CERCLA Integration).

(r) "Remedy" or "Remedial Action" or "RA" shall have the same meaning as provided in section 101(24) of CERCLA, 42 U.S.C. Section 9601(24), and the NCP, and may consist of Operable Units.

(s) "Remove" or "Removal" shall have the same meaning as provided in section 101(23) of CERCLA, 42 U.S.C. Section 9601(23), and the NCP.

(t) "Site" shall include the federal facility of Mather Air Force Base as defined above, the facility as defined above, any area off the facility to or under which a release of hazardous substances has migrated, or threatens to migrate, from a source on or at Mather AFB. For the purposes of obtaining permits, the terms "on-site" and "off-site" shall have the same meaning as provided in the NCP.

(u) "State" shall mean the State of California, its employees and authorized representatives, represented by the Department of Health Services (DHS) as the lead agency.

## 5. DETERMINATIONS

5.1 This Agreement is based upon the placement of the AC&W Site at Mather Air Force Base (AFB), Sacramento County, California, on the National Priorities List (NPL) by the Environmental Protection Agency (EPA) on July 22, 1987, 52 Federal Register 27620, at page 27624 and upon the EPA proposal to include the entire base on the NPL published on July 14, 1989, 54 Federal Register 29820.

5.2 Mather AFB is a facility under the jurisdiction, custody, or control of the Department of Defense within the meaning of Executive Order 12580, 52 Federal Register 2923, 29 January 1987. The Department of the Air Force is authorized to act in behalf of the Secretary of Defense for all functions delegated by the President through E.O. 12580 which are relevant to this Agreement.

5.3 Mather AFB is a federal facility under the jurisdiction of the Secretary of Defense within the meaning of CERCLA section 120, 42 U.S.C. Section 9620, and Superfund Amendments and Reauthorization Act of 1986 (SARA) Sec. 211, 10 U.S.C. Section 2701 et seq. and subject to the Defense Environmental Restoration Program (DERP).

5.4 The Air Force is the authorized delegate of the President under E.O. 12580 for receipt of notification by the State of its ARARs as required by CERCLA section 121(d)(2)(A)(ii), 42 U.S.C. Section 9621(d)(2)(A)(ii).

5.5 The authority of the Air Force to exercise the delegated removal authority of the President pursuant to CERCLA Section 104, 42 U.S.C. Section 9604 is not altered by this agreement.

5.6 The actions to be taken pursuant to this Agreement are reasonable and necessary to protect the public health, welfare, or the environment.

5.7 There are areas within the boundaries of the federal facility where hazardous substances have been deposited, stored, placed, or otherwise come to be located in accordance with 42 U.S.C. Sections 9601(9) and (14).

5.8 There have been releases of hazardous substances, pollutants or contaminants at or from the federal facility into the environment within the meaning of 42 U.S.C. Sections 9601(22), 9604, 9606, and 9607.

5.09 With respect to these releases, the Air Force is an owner and/or operator subject to the provisions of 42 U.S.C. Section 9607 and within the meaning of California Health and Safety Code Section 25323.5(a).

5.10 Included as an Attachment to this Agreement is a map showing source(s) of suspected contamination, based on information available at the time of the signing of this Agreement.

## 6. WORK TO BE PERFORMED

6.1 The Parties agree to perform the tasks, obligations and responsibilities described in this Section in accordance with CERCLA and CERCLA guidance and policy; the NCP; pertinent provisions of RCRA and RCRA guidance and policy; Executive Order 12580; applicable State laws and regulations; and all terms and conditions of this Agreement including documents prepared and incorporated in accordance with Section 7 (Consultation).

6.2 The Air Force agrees to undertake, seek adequate funding for, fully implement and report on the following tasks, with participation of the Parties as set forth in this Agreement:

- (a) Remedial Investigations of the Site;
- (b) Feasibility Studies for the Site;
- (c) All response actions, including Operable Units, for the Site; and
- (d) Operation and maintenance of response actions at the Site.

6.3 The Parties agree to:

(a) Make their best efforts to expedite the initiation of response actions for the Site, particularly for Operable Units; and

(b) Carry out all activities under this Agreement so as to protect the public health, welfare and the environment.

6.4 EPA and the State agree to provide any Party with guidance or reasonable assistance in obtaining guidance relevant to the implementation of this Agreement.

## 7. CONSULTATION: Review and Comment Process for Draft and Final Documents

7.1 Applicability: The provisions of this Section establish the procedures that shall be used by the Parties to provide each other with appropriate technical support, notice, review, comment, and response to comments regarding RI/FS and RD/RA documents, specified herein as either primary or secondary documents. In accordance with CERCLA Section 120, 42 U.S.C. Section 9620, and 10 U.S.C. Section 2705, the Air Force will normally be responsible for issuing primary and secondary documents to EPA and the State. As of the effective date of this Agreement, all draft, draft final and final reports for any deliverable document identified herein shall be prepared, distributed and subject to dispute in accordance with subsections 7.2 through 7.10 below. The designation of a document as "draft" or "final" is solely for purposes of consultation with EPA and the State in accordance with this Section. Such designation does not affect the obligation of the Parties to issue documents, which may be referred to herein as "final", to the public for review and comment as appropriate and as required by law.

### 7.2 General Process for RI/FS and RD/RA documents:

(a) Primary documents include those reports that are major, discrete, portions of RI/FS or RD/RA activities. Primary documents are initially issued by the Air Force in draft subject to review and comment by EPA and the State. Following receipt of comments on a particular draft primary document, the Air Force will respond to the comments received and issue a draft final primary document subject to dispute resolution. The draft final primary document will become the final primary document either thirty (30) days after the issuance of a draft final document if dispute resolution is not invoked or as modified by decision of the dispute resolution process.

(b) Secondary documents include those reports that are discrete portions of the primary documents and are typically input or feeder documents. Secondary documents are issued by the Air Force in draft subject to review and comment by EPA and the State. Although the Air Force will respond to comments received, the draft secondary documents may be finalized in the context of the corresponding primary documents. A secondary document may be disputed at the time the corresponding draft final primary document is issued.

### 7.3 Primary Reports:

(a) The Air Force shall complete and transmit draft reports of the following primary documents for each operable unit and for the final remedy to EPA and the State, for review and comment in accordance with the provisions of this Section.

(1) RI/FS Workplans, including Sampling and Analysis Plans and target dates for RI/FS tasks

(2) Quality Assurance Project Plans (QAPPs)

(3) Community Relations Plans (may be amended as appropriate to address Operable Units)

(4) RI Reports

(5) FS Reports

(6) Proposed Plans

(7) Records of Decision (RODs)

(8) Remedial Designs (RDs)

(9) Remedial Action Work Plans (to include operation and maintenance plans, and schedules for RA)

(b) Only draft final reports for primary documents shall be subject to dispute resolution. The Air Force shall complete and transmit draft primary documents in accordance with the timetable and deadlines established in Section 8 (Deadlines) of this Agreement.

(c) Primary documents may include target dates for subtasks as provided for in subsections 7.4(b) and 18.3. The purpose of target dates is to assist the Air Force in meeting deadlines, but target dates do not become enforceable by their inclusion in the primary documents and are not subject to Section 8 (Deadlines), Section 9 (Extensions) or Section 13 (Enforceability).

#### 7.4 Secondary Documents:

(a) The Air Force shall complete and transmit draft reports of the following secondary documents for each operable unit and for the final remedy to EPA and the State for review and comment.

(1) Site Characterization Summaries (part of RI)

(2) Sampling and Data Results

(3) Treatability Studies (only if generated)

(4) Initial Screenings of Alternatives

(5) Risk Assessments

(6) Well closure methods and procedures

(7) Detailed Analyses of Alternatives

(8) Post-Screening Investigation Work Plans

(b) Although EPA and the State may comment on the draft reports for the secondary documents listed above, such documents shall not be subject to dispute resolution except as provided by Subsection 7.2 hereof. Target dates for the completion and transmission of draft secondary reports shall be established by the Project Managers. The Project Managers also may agree upon additional secondary documents that are within the scope of the listed primary reports.

7.5 Meetings of the Project Managers. (See also 18.3) The Project Managers shall meet in person approximately every ninety (90) days, except as otherwise agreed by the Parties, to review and discuss the progress of work being performed at the Site, including progress on the primary and secondary documents. However, progress meetings shall be held more frequently, but not less than thirty (30) days apart, upon request by any Project Manager. Prior to preparing any draft document specified in subsections 7.3 and 7.4 above, the Project Managers shall meet in an effort to reach a common understanding with respect to the contents of the draft report.

#### 7.6 Identification and Determination of Potential ARARs:

(a) For those primary reports or secondary documents for which ARAR determinations are appropriate, prior to the issuance of a draft report, the Project Managers shall meet to identify and propose all potential ARARs pertinent to the report being addressed, including any permitting requirements which may be a source of ARARs. At that time, DHS, as the lead State agency, shall identify potential State ARARs as required by CERCLA Section 121(d)(2)(A)(ii), 42 U.S.C. Section 9621(d)(2)(A)(ii), which are pertinent to those activities for which it is responsible and the report being addressed. Draft ARAR determinations shall be prepared by the Air Force in accordance with CERCLA Section 121(d)(2), 42 U.S.C. Section 9621(d)(2), the NCP and pertinent guidance issued by EPA.

(b) DHS, as the State lead agency, will contact those State and local governmental agencies which are a potential source of proposed ARARs. The proposed ARARs obtained from the identified agencies will be submitted to the Air Force, along with a list of those agencies who failed to respond to DHS's solicitation of proposed ARARs. The Air Force will contact those agencies who failed to respond and again solicit these inputs.

(c) In identifying potential ARARs, the Parties recognize that actual ARARs can be identified only on a site-specific basis and that ARARs depend on the specific hazardous substances, pollutants and contaminants at a site, the particular actions associated with a proposed remedy and the characteristics of a site. The Parties recognize that ARAR identification is necessarily an iterative process and that potential ARARs must be identified and discussed among the Parties as early as possible, and must be reexamined throughout the RI/FS process until a ROD is issued.



#### 7.7 Review and Comment on Draft Documents:

(a) The Air Force shall complete and transmit each draft primary report to EPA and the State on or before the corresponding deadline established for the issuance of the report. The Air Force shall complete and transmit the draft secondary documents in accordance with the target dates established for the issuance of such reports.

(b) Unless the Parties mutually agree to another time period, all draft reports shall be subject to a sixty (60) day period for review and comment. Review of any document by the EPA and the State may concern all aspects of the report (including completeness) and should include, but is not limited to, technical evaluation of any aspect of the document, and consistency with CERCLA, the NCP, applicable California law, and any pertinent guidance or policy issued by the EPA or the State. At the request of any Project Manager, and to expedite the review process, the Air Force shall make an oral presentation of the report to the Parties at the next scheduled meeting of the Project Managers following transmittal of the draft report or within fourteen (14) days following the request, whichever is sooner. Comments by the EPA and the State shall be provided with adequate specificity so that the Air Force may respond to the comment and, if appropriate, make changes to the draft report. Comments shall refer to any pertinent sources of authority or references upon which the comments are based and, upon request of the Air Force, the EPA or the State, as appropriate, shall provide a copy of the cited authority or reference. EPA or the State may extend the sixty (60) day comment period for an additional thirty (30) days by written notice to the Air Force prior to the end of the sixty (60) day period. On or before the close of the comment period, EPA and the State shall transmit their written comments to the Air Force. In appropriate circumstances, this time period may be further extended in accordance with Section 9 (Extensions).

(c) Representatives of the Air Force shall make themselves readily available to EPA and the State during the comment period for purposes of informally responding to questions and comments on draft reports. Oral comments made during such discussions need not be the subject of a written response by the Air Force on the close of the comment period.

(d) In commenting on a draft report which contains a proposed ARAR determination, EPA and the State shall include a reasoned statement of whether it objects to any portion of the proposed ARAR determination. To the extent that EPA or the State does object, it shall explain the basis for its objection in detail and shall identify any ARARs which it believes were not properly addressed in the proposed ARAR determination.

(e) Following the close of the comment period for a draft report, the Air Force shall give full consideration to all written comments. Within fifteen (15) days following the close of the comment period on a draft secondary report or draft primary report the Parties shall hold a meeting to discuss all comments received. On a draft secondary report the Air Force shall, within sixty (60) days of the close of the comment period, transmit to the EPA and the State its written response to the comments received. On a draft primary report the Air Force shall, within sixty (60) days of the close of the comment period, transmit to EPA and the State a draft final primary report, which shall include the Air Force's response to all written comments received within the comment period. While the resulting draft final report shall be the responsibility of the Air Force, it shall be the product of consensus to the maximum extent possible.

(f) The Air Force may extend the sixty (60) day period for either responding to comments on a draft report or for issuing the draft final primary report for an additional thirty (30) days by providing written notice to EPA and the State. In appropriate circumstances, this time period may be further extended in accordance with Section 9 (Extensions).

#### 7.8 Availability of Dispute Resolution for Draft Final Primary Documents:

(a) Dispute resolution shall be available to the Parties for draft final primary reports as set forth in Section 12 (Dispute Resolution).

(b) When dispute resolution is invoked on a draft final primary report, work may be stopped in accordance with the procedures set forth in subsection 12.9 regarding dispute resolution.

7.9 Finalization of Reports: The draft final primary report shall serve as the final primary report if no party invokes dispute resolution regarding the document or, if invoked, at completion of the dispute resolution process should the Air Force's position be sustained. If the Air Force's determination is not sustained in the dispute resolution process, the Air Force shall prepare, within not more than sixty (60) days, a revision of the draft final report which conforms to the results of dispute resolution. In appropriate circumstances, the time period for this revision period may be extended in accordance with Section 9 (Extensions).

7.10 Subsequent Modification of Final Reports: Following finalization of any primary report pursuant to subsection 7.9 above, any Party may seek to modify the report including seeking additional field work, pilot studies, computer modeling or other supporting technical work, only as provided in subparagraphs (a) and (b) below.

(a) Any Party may seek to modify a report after finalization if it determines, based on new information (i.e., information that becomes available, or conditions that become known, after the report was finalized) that the requested modification is necessary. Any party may seek such a modification by submitting a concise written request to the Project Managers of the other Parties. The request shall specify the nature of the requested modification and how the request is based on new information.

(b) In the event that a consensus is not reached by the Project Managers on the need for a modification, any Party may invoke dispute resolution to determine if such modification shall be conducted. Modification of a report shall be required only upon a showing that:

(1) The requested modification is based on significant new information; and

(2) The requested modification could be of significant assistance in evaluating impacts on the public health or the environment, in evaluating the selection of remedial alternatives, or in protecting human health and the environment.

(c) Nothing in this Section shall alter EPA's or the State's ability to request the performance of additional work which was not contemplated by this Agreement. The Air Force's obligation to perform such work must be established by either a modification of a report or document or by amendments to this Agreement.

## 8. DEADLINES

8.1 All deadlines agreed upon before the effective date of this Agreement shall be made an Appendix to this Agreement. To the extent that deadlines have already been mutually agreed upon by the Parties prior to the execution of this Agreement, they will satisfy the requirements of this Section and remain in effect, shall be published in accordance with subsection 8.2, and shall be incorporated into the appropriate work plans.

8.2 Within twenty-one (21) days of the effective date of this Agreement, the Air Force shall propose deadlines for completion of the following draft primary documents for those operable units identified as of the effective date of this Agreement and for the final remedy:

- (a) RI Reports
- (b) FS Reports
- (c) Proposed Plans
- (d) Records of Decision

Within fifteen (15) days of receipt, EPA and the State shall review and provide comments to the Air Force regarding the proposed deadlines. Within fifteen (15) days following receipt of the comments, the Air Force shall, as appropriate, make revisions and reissue the proposal. The Parties shall meet as necessary to discuss and finalize the proposed deadlines. All agreed-upon deadlines shall be incorporated into the appropriate work plans. If the Parties fail to agree within thirty (30) days on the proposed deadlines, the matter shall immediately be submitted for dispute resolution pursuant to Section 12 (Dispute Resolution). The final deadlines established pursuant to this subsection shall be published by EPA, in conjunction with the State, and shall become an Appendix to this Agreement.

8.3 Within twenty-one (21) days of issuance of the Record of Decision for any operable unit or for the final remedy, the Air Force shall propose deadlines for completion of the following draft primary documents:

- (a) Remedial Designs, and
- (b) Remedial Action Work Plans (to include operation and maintenance plans, and schedules for RA).

These deadlines shall be proposed, finalized and published utilizing the same procedures set forth in Subsection 8.2 above.

8.4 For any operable units not identified as of the effective date of this Agreement, the Air Force shall propose deadlines for all documents listed in subsection 7.3 (with the exception of the Community Relations Plan) within twenty-one (21) days of agreement on the proposed operable unit by all Parties. These deadlines shall be proposed, finalized and published using the same procedures set forth in Subsection 8.2, above.

8.5 The deadlines set forth in this Section, or to be established as set forth in this Section, may be extended pursuant to Section 9 (Extensions). The Parties recognize that one possible basis for extension of the deadlines for completion of the Remedial Investigation and Feasibility Study Reports is the identification of significant new Site conditions during the performance of the remedial investigation.

## 9. EXTENSIONS

9.1 Timetables, deadlines and schedules shall be extended upon receipt of a timely request for extension and when good cause exists for the requested extension. Any request for extension by a Party shall be submitted to the other Parties in writing and shall specify:

(a) The timetable, deadline or schedule that is sought to be extended;

(b) The length of the extension sought;

(c) The good cause(s) for the extension; and

(d) The extent to which any related timetable and deadline or schedule would be affected if the extension were granted.

9.2 Good cause exists for an extension when sought in regard to:

(a) An event of Force Majeure;

(b) A delay caused by another party's failure to meet any requirement of this Agreement;

(c) A delay caused by the good faith invocation of dispute resolution or the initiation of judicial action;

(d) A delay caused, or which is likely to be caused, by the grant of an extension in regard to another timetable and deadline or schedule;

(e) A delay caused by public comment periods or hearings required under State law in connection with the State's performance of this Agreement;

(f) Any work stoppage within the scope of Section 11 (Emergencies and Removals); or

(g) Any other event or series of events mutually agreed to by the Parties as constituting good cause.

9.3 Absent agreement of the Parties with respect to the existence of good cause, a Party may seek and obtain a determination through the dispute resolution process that good cause exists.

9.4 Within seven days of receipt of a request for an extension of a timetable, deadline or schedule, each receiving Party shall advise the requesting Party in writing of its, the receiving Party's, position on the request. Any failure by a requesting Party to respond within the 7-day period shall be deemed to constitute concurrence with the request for extension. If a receiving Party does not concur in the requested extension, it shall include in its statement of nonconcurrence an explanation of the basis for its position.

9.5 If there is consensus among the Parties that the requested extension is warranted, the Air Force shall extend the affected timetable and deadline or schedule accordingly. If there is no consensus among the Parties as to whether all or part of the requested extension is warranted, the timetable and deadline or schedule shall not be extended except in accordance with a determination resulting from the dispute resolution process.

9.6 Within seven days of receipt of a statement of nonconcurrence with the requested extension, the requesting Party may invoke dispute resolution.

9.7 A timely and good faith request by the Air Force for an extension shall toll any assessment of stipulated penalties or application for judicial enforcement of the affected timetable and deadline or schedule until a decision is reached on whether the requested extension will be approved. If dispute resolution is invoked and the requested extension is denied, stipulated penalties may be assessed and may accrue from the date of the original timetable, deadline or schedule. Following the grant of an extension, an assessment of stipulated penalties or an application for judicial enforcement may be sought only to compel compliance with the timetable and deadline or schedule as most recently extended.

## 10. FORCE MAJEURE

10.1 A Force Majeure shall mean any event arising from causes beyond the control of a Party that causes a delay in or prevents the performance of any obligation under this Agreement, including, but not limited to, acts of God; fire; war; insurrection; civil disturbance; explosion; unanticipated breakage or accident to machinery, equipment or lines of pipe despite reasonably diligent maintenance; adverse weather conditions that could not be reasonably anticipated; unusual delay in transportation; restraint by court order or order of public authority; inability to obtain, at reasonable cost and after exercise of reasonable diligence, any necessary authorizations, approvals, permits, or licenses due to action or inaction of any governmental agency or authority other than the Air Force; delays caused by compliance with applicable statutes or regulations governing contracting, procurement or acquisition procedures, despite the exercise of reasonable diligence; and insufficient availability of appropriated funds which have been diligently sought. In order for Force Majeure based on insufficient funding to apply to the Air Force, the Air Force shall have made timely request for such funds as part of the budgetary process as set forth in Section 15 (Funding). A Force Majeure shall also include any strike or other labor dispute, whether or not within the control of the Parties affected thereby. Force Majeure shall not include increased costs or expenses of Response Actions, whether or not anticipated at the time such Response Actions were initiated.



## 11. EMERGENCIES AND REMOVALS

11.1 Discovery and Notification. If any Party discovers or becomes aware of an emergency or other situation that may present an endangerment to public health, welfare or the environment at or near the Site, which is related to or may affect the work performed under this Agreement, that Party shall immediately orally notify all other Parties. If the emergency arises from activities conducted pursuant to this Agreement, the Air Force shall then take immediate action to notify the appropriate State and local agencies and affected members of the public.

11.2 Work Stoppage. In the event any Party determines that activities conducted pursuant to this Agreement will cause or otherwise be threatened by a situation described in Subsection 11.1, the Party may propose the termination of such activities. If the Parties mutually agree, the activities shall be stopped for such period of time as required to abate the danger. In the absence of mutual agreement, the activities shall be stopped in accordance with the proposal, and the matter shall be immediately referred to the EPA Hazardous Waste Management Division Director for a work stoppage determination in accordance with Section 12.9.

### 11.3 Removal Actions

(a) The provisions of this Section shall apply to all removal actions as defined in CERCLA Section 101(23), 42 U.S.C. Section 9601(23) and California Health and Safety Code Section 25323, including all modifications to, or extensions of, the ongoing removal actions, and all new removal actions proposed or commenced following the effective date of this Agreement.

(b) Any removal actions conducted at the Site shall be conducted in a manner consistent with this Agreement, CERCLA, the NCP and Executive Order 12580.

(c) Nothing in this Agreement shall alter the Air Force's authority with respect to removal actions conducted pursuant to Section 104 of CERCLA, 42 U.S.C. Section 9604.

(d) Nothing in this Agreement shall alter any authority the State or EPA may have with respect to removal actions conducted on the Site.

(e) All reviews conducted by EPA and the State pursuant to 10 U.S.C. Section 2705(b)(2) will be expedited so as not to unduly jeopardize fiscal resources of the Air Force for funding the removal actions.

(f) If a Party determines that there may be an endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance, pollutant or contaminant at or from the Site, including but not limited to discovery of contamination of a drinking water well at concentrations that exceed any State or federal drinking water action level or standards, the Party may request that the Air Force take such response actions as may be necessary to abate such danger or threat and to protect the public health or welfare or the environment. Such actions might include provision of alternative drinking water supplies or other response actions listed in CERCLA Section 101 (23) or (24), or such other relief as the public interest may require.

#### 11.4 Notice and Opportunity to Comment.

(a) The Air Force shall provide the other Parties with timely notice and opportunity to review and comment upon any proposed removal action for the Site, in accordance with 10 U.S.C. Section 2705(a) and (b). The Air Force agrees to provide the information described below pursuant to such obligation.

(b) For emergency response actions, the Air Force shall provide EPA and the State with notice in accordance with Subsection 11.1. Such oral notification shall, except in the case of extreme emergencies, include adequate information concerning the Site background, threat to the public health and welfare or the environment (including the need for response), proposed actions and costs (including a comparison of possible alternatives, means of transportation of any hazardous substances off-site, and proposed manner of disposal), expected change in the situation should no action be taken or should action be delayed (including associated environmental impacts), any important policy issues, and the Air Force On-Scene Coordinator recommendations. Within forty-five (45) days of completion of the emergency action, the Air Force will furnish EPA and the State with an Action Memorandum addressing the information provided in the oral notification, and any other information required pursuant to CERCLA and the NCP, and in accordance with pertinent EPA guidance, for such actions.

(c) For other removal actions, the Air Force will provide EPA and the State with any information required by CERCLA, the NCP, and in accordance with pertinent EPA guidance, such as the Action Memorandum, the Engineering Evaluation/Cost Analysis (in the case of non-time-critical removals) and, to the extent it is not otherwise included, all information required to be provided in accordance with paragraph (b) of this Subsection. Such information shall be furnished at least forty-five (45) days before the response action is to begin.

(d) All activities related to ongoing removal actions shall be reported by the Air Force in the progress reports as described in Section 18 (Project Managers).

11.5 Any dispute among the Parties as to whether a proposed nonemergency response action is properly considered a removal action, as defined by 42 U.S.C. Section 9601(23), or as to the consistency of such a removal action with the final remedial action, shall be resolved pursuant to Section 12 (Dispute Resolution). Such dispute may be brought directly to the Dispute Resolution Committee (DRC) or the Senior Executive Committee (SEC) at any Party's request.

## 12. DISPUTE RESOLUTION

12.1 Except as specifically set forth elsewhere in this Agreement, if a dispute arises under this Agreement, the procedures of this Section shall apply. Any party may invoke this dispute resolution procedure. All Parties to this Agreement shall make reasonable efforts to informally resolve disputes at the Project Manager or immediate supervisor level. If resolution cannot be achieved informally, the procedures of this Section shall be implemented to resolve a dispute.

12.2 Within thirty (30) days after:

(a) the issuance of a draft final primary document pursuant to Section 7 (Consultation), or

(b) any action which leads to or generates a dispute, the disputing Party shall submit to the Dispute Resolution Committee (DRC) a written statement of dispute setting forth the nature of the dispute, the work affected by the dispute, the disputing Party's position with respect to the dispute and the technical, legal or factual information the disputing Party is relying upon to support its position.

12.3 Prior to any Party's issuance of a written statement of a dispute, the disputing Party shall engage the other Party in informal dispute resolution among the Project Managers and/or their immediate supervisors. During this informal dispute resolution period the Parties shall meet as many times as are necessary to discuss and attempt resolution of the dispute.

12.4 The DRC will serve as a forum for resolution of dispute(s) for which agreement has not been reached through informal dispute resolution. The Parties shall each designate one individual and an alternate to serve on the DRC. The individuals designated to serve on the DRC shall be employed at the policy level, Senior Executive Service (SES), or equivalent or be delegated the authority to participate on the DRC for the purposes of dispute resolution under this Agreement. The EPA representative on DRC is the Hazardous Waste Management Division Director of EPA's Region 9. The Air Force's designated member is the Deputy Chief of Staff for Engineering and Services, Headquarters Air Training Command. The DHS representative is the Chief of the Site Mitigation Unit, Region 1. Written notice of any delegation of authority from a Party's designated representative on the DRC shall be provided to all other Parties pursuant to the procedures of Section 21 (Notification).

12.5 Following elevation of a dispute to the DRC, the DRC shall have twenty-one (21) days to unanimously resolve the dispute and

issue a written decision. If the DRC is unable to unanimously resolve the dispute within this twenty-one (21) day period, the written statement of dispute shall be forwarded to the Senior Executive Committee (SEC) for resolution within seven (7) days after the close of the twenty-one (21) day resolution period.

12.6 The SEC will serve as the forum for resolution of disputes for which agreement has not been reached by the DRC. The EPA representative on the SEC is the Regional Administrator of EPA Region 9. The Air Force's representative on the SEC is the Deputy Assistant Secretary of the Air Force for Environment, Safety, and Occupational Health. The DHS representative on the SEC is the DHS Chief Deputy Director. The SEC members shall, as appropriate, confer, meet and exert their best efforts to resolve the dispute and issue a written decision. If unanimous resolution of the dispute is not reached within twenty-one (21) days, EPA's Regional Administrator shall issue a written position on the dispute. The Air Force or the State may, within fourteen (14) days of the Regional Administrator's issuance of EPA's position, issue a written notice elevating the dispute to the Administrator of EPA for resolution in accordance with all applicable laws and procedures. In the event the Air Force or the State elects not to elevate the dispute to the Administrator within the designated fourteen (14) day escalation period, the Air Force and the State shall be deemed to have agreed with the Regional Administrator's written position with respect to the dispute.

12.7 Upon escalation of a dispute to the Administrator of EPA pursuant to Subsection 12.6, above, the Administrator will review and resolve the dispute within twenty-one (21) days. Upon request, and prior to resolving the dispute, the EPA Administrator shall meet and confer with the Air Force's Secretariat Representative and DHS Chief Deputy Director to discuss the issue(s) under dispute. Upon resolution, the Administrator shall provide the Air Force and the State with a written final decision setting forth resolution of the dispute. The duties of the Administrator set forth in this Section shall not be delegated.

12.8 The pendency of any dispute under this Section shall not affect any Party's responsibility for timely performance of the work required by this Agreement, except that the time period for completion of work affected by such dispute shall be extended for a period of time usually not to exceed the actual time taken to resolve any good faith dispute in accordance with the procedures specified herein. All elements of the work required by this Agreement which are not affected by the dispute shall continue and be completed in accordance with the applicable timetable and deadline or schedule.

12.9 When dispute resolution is in progress, work affected by the dispute will immediately be discontinued if the Hazardous Waste Management Division Director for EPA Region 9 requests, in writing, that work related to the dispute be stopped because, in EPA's opinion, such work is inadequate or defective, and such inadequacy or defect is likely to yield an adverse effect on human health or the environment, or is likely to have a substantial adverse effect on the remedy selection or implementation process. The State may request the EPA Hazardous Waste Management Division Director to order work stopped for the reasons set out above. To the extent possible, the Party seeking a work stoppage shall consult with the other Parties prior to initiating a work stoppage request. After work stoppage, if a Party believes that the work stoppage is inappropriate or may have potential significant adverse impacts, the Party may meet with the other Parties to discuss the work stoppage. Following this meeting and further considerations of this issue the EPA Hazardous Waste Management Division Director will issue, in writing, a final decision with respect to the work stoppage. The final written decision of the EPA Hazardous Waste Management Division Director may immediately be subject to formal dispute resolution. Such dispute may be brought directly to either the DRC or the SEC, at the discretion of the Party requesting dispute resolution.

12.10 Within twenty-one (21) days of resolution of a dispute pursuant to the procedures specified in this Section, the Air Force shall incorporate the resolution and final determination into the appropriate plan, schedule or procedure and proceed to implement this Agreement according to the amended plan, schedule or procedures.

12.11 Resolution of a dispute pursuant to this Section of the Agreement constitutes a final resolution of any dispute arising under this Agreement. All Parties shall abide by all terms and conditions of any final resolution of dispute obtained pursuant to this Section of this Agreement.

### 13. ENFORCEABILITY

#### 13.1 The Parties agree that:

(a) Upon the effective date of this Agreement, any standard, regulation, condition, requirement or order which has become effective under CERCLA and is incorporated into this Agreement is enforceable by any person pursuant to CERCLA section 310, and any violation of such standard, regulation, condition, requirement or order will be subject to civil penalties under CERCLA sections 310(c) and 109;

(b) All timetables or deadlines associated with the RI/FS shall be enforceable by any person pursuant to CERCLA section 310, and any violation of such timetables or deadlines will be subject to civil penalties under CERCLA sections 310(c) and 109;

(c) All terms and conditions of this Agreement which relate to remedial actions, including corresponding timetables, deadlines or schedules, and all work associated with remedial actions, shall be enforceable by any person pursuant to CERCLA section 310(c), and any violation of such terms or conditions will be subject to civil penalties under CERCLA sections 310(c) and 109; and

(d) Any final resolution of a dispute pursuant to Section 12 (Dispute Resolution) of this Agreement which establishes a term, condition, timetable, deadline or schedule shall be enforceable by any person pursuant to CERCLA section 310(c), and any violation of such terms, condition, timetable, deadline or schedule will be subject to civil penalties under CERCLA sections 310(c) and 109.

13.2 Nothing in this Agreement shall be construed as authorizing any person to seek judicial review of any action or work where review is barred by any provision of CERCLA including CERCLA section 113(h).

13.3 Nothing in this Agreement shall be construed as a restriction or waiver of any rights the EPA or the State may have under CERCLA, including but not limited to any rights under Sections 113 and 310, 42 U.S.C. Sections 9613 and 9659. The USAF does not waive any rights it may have under CERCLA Section 120, SARA Section 211, and Executive Order 12580.

13.4 The Parties agree to exhaust their rights under Section 12 (Dispute Resolution) prior to exercising any rights to judicial review that they may have.

13.5 The Parties agree that all Parties shall have the right to enforce the terms of this Agreement.

#### 14. STIPULATED PENALTIES

14.1 In the event that the Air Force fails to submit a primary document listed in Section 7 (Consultation) to EPA and the State pursuant to the appropriate timetable or deadline in accordance with the requirements of this Agreement, or fails to comply with a term or condition of this Agreement which relates to an operable unit or final remedial action, EPA may assess a stipulated penalty against the Air Force. The State may also recommend to EPA that a stipulated penalty be assessed. A stipulated penalty may be assessed in an amount not to exceed \$5,000 for the first week (or part thereof), and \$10,000 for each additional week (or part thereof) for which a failure set forth in this subsection occurs.

14.2 Upon determining that the Air Force has failed in a manner set forth in subsection 14.1, EPA shall so notify the Air Force in writing. If the failure in question is not already subject to dispute resolution at the time such notice is received, the Air Force shall have fifteen (15) days after receipt of the notice to invoke dispute resolution on the question of whether the failure did in fact occur. The Air Force shall not be liable for the stipulated penalty assessed by EPA if the failure is determined, through the dispute resolution process, not to have occurred. No assessment of a stipulated penalty shall be final until the conclusion of dispute resolution procedures related to the assessment of the stipulated penalty.

14.3 The annual reports required by CERCLA section 120(e)(5), 42 U.S.C. Section 9620(e)(5), shall include, with respect to each final assessment of a stipulated penalty against the Air Force under this Agreement, each of the following:

- (a) The federal facility responsible for the failure;
- (b) A statement of the facts and circumstances giving rise to the failure;
- (c) A statement of any administrative or other corrective action taken at the relevant federal facility, or a statement of why such measures were determined to be inappropriate;
- (d) A statement of any additional action taken by or at the federal facility to prevent recurrence of the same type of failure; and
- (e) The total dollar amount of the stipulated penalty assessed for the particular failure.



14.4 Stipulated penalties assessed pursuant to this Section shall be payable to the Hazardous Substances Response Trust Fund only in the manner and to the extent expressly provided for in acts authorizing funds for, and appropriations to, the DOD. EPA and the State agree, to the extent allowed by law, to share equally any stipulated penalties paid on behalf of Mather AFB between the Hazardous Substance Response Trust Fund and an appropriate State fund.

14.5 In no event shall this Section give rise to a stipulated penalty in excess of the amount set forth in CERCLA section 109, 42 U.S.C. Section 9609.

14.6 This Section shall not affect the Air Force's ability to obtain an extension of a timetable, deadline or schedule pursuant to Section 9 (Extensions).

14.7 Nothing in this Agreement shall be construed to render any officer or employee of the Air Force personally liable for the payment of any stipulated penalty assessed pursuant to this Section.

## 15. FUNDING

15.1 It is the expectation of the Parties to this Agreement that all obligations of the Air Force arising under this Agreement will be fully funded. The Air Force agrees to seek sufficient funding through the DOD budgetary process to fulfill its obligations under this Agreement.

15.2 In accordance with CERCLA section 120 (e)(5)(B), 42 U.S.C. Section 9620 (e)(5)(B), the Air Force shall include, in its submission to the Department of Defense annual report to Congress, the specific cost estimates and budgetary proposals associated with the implementation of this Agreement.

15.3 Any requirement for the payment or obligation of funds, including stipulated penalties, by the Air Force established by the terms of this Agreement shall be subject to the availability of appropriated funds, and no provision herein shall be interpreted to require obligation or payment of funds in violation of the Anti-Deficiency Act, 31 U.S.C. Section 1341. In cases where payment or obligation of funds would constitute a violation of the Anti-Deficiency Act, the dates established requiring the payment or obligation of such funds shall be appropriately adjusted.

15.4 If appropriated funds are not available to fulfill the Air Force's obligations under this Agreement, EPA and the State reserve the right to initiate an action against any other person, or to take any response action, which would be appropriate absent this Agreement.

15.5 Funds authorized and appropriated annually by Congress under the "Environmental Restoration, Defense" appropriation in the Department of Defense Appropriation Act and allocated by the Deputy Assistant Secretary of Defense for Environment to the Air Force will be the source of funds for activities required by this Agreement consistent with Section 211 of CERCLA, 10 U.S.C., Chapter 160. However, should the Environmental Restoration, Defense appropriation be inadequate in any year to meet the total Air Force CERCLA implementation requirements, the DOD shall employ and the Air Force shall follow a standardized DOD prioritization process which allocates that year's appropriations in a manner which maximizes the protection of human health and the environment. A standardized DOD prioritization model shall be developed and utilized with the assistance of EPA and the states.

## 16. EXEMPTIONS

16.1 The obligation of the Air Force to comply with the provisions of this Agreement may be relieved by:

(a) A Presidential order of exemption issued pursuant to the provisions of CERCLA Section 120(j)(1), 42 U.S.C. Section 9620(j)(1), or RCRA Section 6001, 42 U.S.C. Section 6961; or

(b) The order of an appropriate court.

16.2 The State reserves any statutory right it may have to challenge any Presidential Order relieving the Air Force of its obligations to comply with this Agreement.

## 17. STATUTORY COMPLIANCE/RCRA-CERCLA INTEGRATION

17.1 The Parties intend to integrate the Air Force's CERCLA response obligations and RCRA corrective action obligations which relate to the release(s) of hazardous substances, hazardous wastes, pollutants or contaminants covered by this Agreement into this comprehensive Agreement. Therefore, the Parties intend that activities covered by this Agreement will achieve compliance with CERCLA, 42 U.S.C. Section 9601 et. seq.; to satisfy the corrective action requirements of RCRA Section 3004(u) & (v), 42 U.S.C. Section 6924(u) & (v), for a RCRA permit, and RCRA section 3008(h), 42 U.S.C. Section 6928(h), for interim status facilities; and to meet or exceed all applicable or relevant and appropriate federal and State laws and regulations, to the extent required by CERCLA Section 121, 42 U.S.C. Section 9621.

17.2 Based upon the foregoing, the Parties intend that any remedial action selected, implemented and completed under this Agreement will be protective of human health and the environment such that remediation of releases covered by this Agreement shall obviate the need for further corrective action under RCRA (i.e., no further corrective action shall be required). The Parties agree that with respect to releases of hazardous waste covered by this Agreement, RCRA shall be considered an applicable or relevant and appropriate requirement pursuant to CERCLA Section 121, 42 U.S.C. Section 9621.

17.3 The Parties recognize that the requirement to obtain permits for response actions undertaken pursuant to this Agreement shall be as provided for in CERCLA and the NCP. The activities at Mather AFB may require the issuance of permits under federal and State laws. This Agreement does not affect the requirements, if any, to obtain such permits. However, if a permit is issued to the Air Force for ongoing hazardous waste management activities at the Site, the issuing party shall reference and incorporate in a permit condition any appropriate provision, including appropriate schedules (and the provision for extension of such schedules), of this Agreement into such permit. The Parties intend that any judicial review of any permit condition which references this Agreement shall, to the extent authorized by law, only be reviewed under the provisions of CERCLA.

## 18. PROJECT MANAGERS

18.1 On or before the effective date of this Agreement, EPA, the Air Force, and the State shall each designate a Project Manager and an alternate (each hereinafter referred to as Project Manager), for the purpose of overseeing the implementation of this Agreement. The Project Managers shall be responsible on a daily basis for assuring proper implementation of the RI/FS and the RD/RA in accordance with the terms of the Agreement. In addition to the formal notice provisions set forth in Section 21 (Notification), to the maximum extent possible, communications among the Air Force, EPA, and the State on all documents, including reports, comments, and other correspondence concerning the activities performed pursuant to this Agreement, shall be directed through the Project Managers.

18.2 The Air Force, EPA and the State may change their respective Project Managers. The other Parties shall be notified in writing within five days (5) of the change.

18.3 The Project Managers shall meet to discuss progress as described in Subsection 7.5. Although the Air Force has ultimate responsibility for meeting its respective deadlines or schedule, the Project Managers shall assist in this effort by consolidating the review of primary and secondary documents whenever possible, and by scheduling progress meetings to review reports, evaluate the performance of environmental monitoring at the Site, review RI/FS or RD/RA progress, discuss target dates for elements of the RI/FS to be conducted in the following one hundred and eighty (180) days, resolve disputes, and adjust deadlines or schedules. At least one week prior to each scheduled progress meeting, the Air Force will provide to the other Parties a draft agenda and summary of the status of the work subject to this Agreement. The minutes of each progress meeting, with the meeting agenda and all documents discussed during the meeting (which were not previously provided) as attachments, shall constitute a progress report, which will be sent to all Project Managers within ten (10) business days after the meeting ends. If an extended period occurs between Project Manager progress meetings, the Project Managers may agree that the Air Force shall prepare an interim progress report and provide it to the other Parties. The report shall include the information that would normally be discussed in a progress meeting of the Project Managers. Other meetings shall be held more frequently upon request by any Project Manager.

18.4 The authority of the Project Managers shall include, but is not limited to:

(a) Taking samples and ensuring that sampling and other field work is performed in accordance with the terms of any final work plan and QAPP;

(b) Observing, and taking photographs and making such other reports on the progress of the work as the Project Managers deem appropriate, subject to the limitations set forth in Section 25 (Access To Federal Facility) hereof;

(c) Reviewing records, files and documents relevant to the work performed;

(d) Determining the form and specific content of the Project Manager meetings and of progress reports based on such meetings; and

(e) Recommending and requesting minor field modifications to the work to be performed pursuant to a final work plan, or in techniques, procedures, or design utilized in carrying out such work plan.

18.5 Any minor field modification proposed by any Party pursuant to this Section must be approved orally by all Parties' Project Managers to be effective. The Air Force Project Manager will make a contemporaneous record of such modification and approval in a written log, and a copy of the log entry will be provided as part of the next progress report. Even after approval of the proposed modification, no Project Manager will require implementation by a government contractor without approval of the appropriate Government Contracting Officer.

18.6 The Project Manager for the Air Force shall be responsible for day-to-day field activities at the Site. The Air Force Project Manager or other designated employee of Mather AFB Environmental Management Office shall be present at the Site or reasonably available to supervise work during all hours of work performed at the Site pursuant to this Agreement. For all times that such work is being performed, the Air Force Project Manager shall inform the command post at Mather AFB of the name and telephone number of the designated employee responsible for supervising the work.

18.7 The Project Managers shall be reasonably available to consult on work performed pursuant to this Agreement and shall make themselves available to each other for the pendency of this Agreement. The absence of EPA, the State, or Air Force Project Managers from the facility shall not be cause for work stoppage of activities taken under this Agreement.

## 19. PERMITS

19.1 The Parties recognize that under sections 121(d) and 121(e)(1) of CERCLA/SARA, 42 U.S.C. Section 9621(d) and 9621(e)(1), and the NCP, portions of the response actions called for by this Agreement and conducted entirely on-site are exempted from the procedural requirement to obtain a federal, State, or local permit but must satisfy all the applicable or relevant and appropriate federal and State standards, requirements, criteria, or limitations which would have been included in any such permit.

19.2 This Section is not intended to relieve the Air Force from any and all regulatory requirements, including obtaining a permit, whenever it proposes a response action involving either the movement of hazardous substances, pollutants, or contaminants off-site, or the conduct of a response action off-site.

19.3 The Air Force shall notify EPA and the State in writing of any permit required for off-site activities as soon as it becomes aware of the requirement. The Air Force agrees to obtain any permits necessary for the performance of any work under this Agreement. Upon request, the Air Force shall provide EPA and the State copies of all such permit applications and other documents related to the permit process. Copies of permits obtained in implementing this Agreement shall be appended to the appropriate submittal or progress report. Upon request by the Air Force Project Manager, the Project Managers of EPA and the State will assist Mather AFB to the extent feasible in obtaining any required permit.

## 20. QUALITY ASSURANCE

20.1 In order to provide quality assurance and maintain quality control regarding all field work and sample collection performed pursuant to this Agreement, the Air Force agrees to designate a Quality Assurance Officer (QAO) who will ensure that all work is performed in accordance with approved work plans, sampling plans and QAPPs. The QAO shall maintain for inspection a log of quality assurance field activities and provide a copy to the Parties upon request.

20.2 To ensure compliance with the QAPP, the Air Force shall arrange for access, upon request by EPA or the State, to all laboratories performing analysis on behalf of the Air Force pursuant to this Agreement.



## 21. NOTIFICATION

21.1 All Parties shall transmit primary and secondary documents, and comments thereon, and all notices required herein by next day mail, hand delivery, or facsimile. Time limitations shall commence upon receipt.

21.2 Notice to the individual Parties pursuant to this Agreement shall be sent to the addresses specified by the Parties. Initially these shall be as follows:

Remedial Project Manager  
Mather AFB (T-4-6)  
U.S. Environmental Protection Agency  
Region 9  
Hazardous Waste Management Division  
215 Fremont Street  
San Francisco, CA 94105

and

Senior of Military Team  
Department of Health Services  
Toxic Substances Control Division  
Region 1  
Site Mitigation Unit  
83 Scripps Drive  
Suite 101  
Sacramento, CA 95825

and

323 FTW/EM  
Mather AFB, CA 95655-5000

21.3 All routine correspondence may be sent via first class mail to the above addressees.

## 22. DATA AND DOCUMENT AVAILABILITY

22.1 Each Party shall make all sampling results, test results or other data or documents generated through the implementation of this Agreement available to the other Parties. All quality assured data shall be supplied within sixty (60) days of its collection. If the quality assurance procedure is not completed within sixty (60) days, raw data or results shall be submitted within the sixty (60) day period and quality assured data or results shall be submitted as soon as they become available.

22.2 The sampling Party's project manager shall notify the other Parties' Project Managers not less than ten (10) days in advance of any sample collection. If it is not possible to provide 10 days prior notification, the sampling Party's Project Manager shall notify the other Project Managers as soon as possible after becoming aware that samples will be collected. Each Party shall allow, to the extent practicable, split or duplicate samples to be taken by the other Parties or their authorized representatives.

## 23. RELEASE OF RECORDS

23.1 The Parties may request of one another access to or a copy of any record or document relating to this Agreement or the IRP. If the Party that is the subject of the request (the originating Party) has the record or document, that Party shall provide access to or a copy of the record or document; provided, however, that no access to or copies of records or documents need be provided if they are subject to claims of attorney-client privilege, attorney work product, deliberative process, enforcement confidentiality, or properly classified for national security under law or executive order.

23.2 Records or documents identified by the originating Party as confidential pursuant to other non-disclosure provisions of the Freedom of Information Act, 5 U.S.C. Section 552, or the California Public Records Act, Section 6250, et seq. of the California Government Code, shall be released to the requesting Party, provided the requesting Party states in writing that it will not release the record or document to the public without prior approval of the originating Party, or after opportunity to consult and, if necessary, contest any preliminary decision to release a document, in accordance with applicable statute and regulations. Records or documents which are provided to the requesting Party and which are not identified as confidential may be made available to the public without further notice to the originating Party.

23.3 The Parties will not assert one of the above exemptions, including any available under the Freedom of Information Act or California Public Records Act, even if available, if no governmental interest would be jeopardized by access or release as determined solely by that Party.

23.4 Subject to section 120(j)(2) of CERCLA, 42 U.S.C. Section 9620(j)(2), any documents required to be provided by Section 7 (Consultation), and analytical data showing test results will always be releasable and no exemption shall be asserted by any Party.

23.5 This Section does not change any requirement regarding press releases in Section 26 (Public Participation and Community Relations).

23.6 A determination not to release a document for one of the reasons specified above shall not be subject to Section 12 (Dispute Resolution). Any Party objecting to another Party's determination may pursue the objection through the determining Party's appeal procedures.

#### 24. PRESERVATION OF RECORDS

24.1 Despite any document retention policy to the contrary, the Parties shall preserve, during the pendency of this Agreement and for a minimum of ten years after its termination, all records and documents contained in the Administrative Record and any additional records and documents retained in the ordinary course of business which relate to the actions carried out pursuant to this Agreement. After this ten year period, each Party shall notify the other Parties at least forty-five (45) days prior to destruction of any such documents. Upon request by any Party, the requested Party shall make available such records or copies of any such records, unless withholding is authorized and determined appropriate by law.

## 25. ACCESS TO FEDERAL FACILITY

25.1 Without limitations on any authority conferred on EPA or the State by statute or regulation, EPA, the State or their authorized representatives, shall be allowed to enter Mather AFB at reasonable times for purposes consistent with the provisions of the Agreement, subject to any statutory and regulatory requirements necessary to protect national security or mission essential activities. Such access shall include, but not be limited to, reviewing the progress of the Air Force in carrying out the terms of this Agreement; ascertaining that the work performed pursuant to this Agreement is in accordance with approved work plans, sampling plans and QAPPs; and conducting such tests as EPA, the State, or the Project Managers deem necessary.

25.2 The Air Force shall honor all reasonable requests for access by the EPA or the State, conditioned upon presentation of proper credentials. The Air Force Project Manager will provide briefing information, coordinate access and escort to restricted or controlled-access areas, arrange for base passes and coordinate any other access requests which arise.

25.3 EPA and the State shall provide reasonable notice to the Air Force Project Manager to request any necessary escorts. EPA and the State shall not use any camera, sound recording or other recording device at Mather AFB without the permission of the Air Force Project Manager. The Air Force shall not unreasonably withhold such permission.

25.4 The access by EPA and the State, granted in subsection 25.1 of this Section, shall be subject to those regulations necessary to protect national security or mission essential activities. Such regulation shall not be applied so as to unreasonably hinder EPA or the State from carrying out their responsibilities and authority pursuant to this Agreement. In the event that access requested by either EPA or the State is denied by the Air Force, the Air Force shall provide an explanation within forty-eight (48) hours of the reason for the denial, including reference to the applicable regulations, and, upon request, a copy of such regulations. The Air Force shall expeditiously make alternative arrangements for accommodating the requested access. The Parties agree that this Agreement is subject to CERCLA Section 120(j), 42 U.S.C. Section 9620(j), regarding the issuance of Site Specific Presidential Orders as may be necessary to protect national security.

25.5 If EPA or the State requests access in order to observe a sampling event or other work being conducted pursuant to this Agreement, and access is denied or limited, the Air Force agrees to reschedule or postpone such sampling or work if EPA or the State so requests, until such mutually agreeable time when the requested access is allowed. The Air Force shall not restrict the access rights of the EPA or the State to any greater extent than the Air Force restricts the access rights of its contractors performing work pursuant to this Agreement.

25.6 All Parties with access to Mather AFB pursuant to this Section shall comply with all applicable health and safety plans.

25.7. To the extent the activities pursuant to this Agreement must be carried out on other than Air Force property, the Air Force shall use its best efforts, including its authority under CERCLA Section 104, to obtain access agreements from the owners which shall provide reasonable access for the Air Force, EPA, and the State and their representatives. The Air Force may request the assistance of the State in obtaining such access, and upon such request, the State will use its best efforts to obtain the required access. In the event that the Air Force is unable to obtain such access agreements, the Air Force shall promptly notify EPA and the State.

25.8 With respect to non-Air Force property on which monitoring wells, pumping wells, or other response actions are to be located, the Air Force shall use its best efforts to ensure that any access agreements shall provide for the continued right of entry for all Parties for the performance of such remedial activities. In addition, any access agreement shall provide that no conveyance of title, easement, or other interest in the property shall be consummated without the continued right of entry.

25.9 Nothing in this Section shall be construed to limit EPA's and the State's full right of access as provided in 42 U.S.C. Section 9604(e) and California Health and Safety Code section 25185, except as that right may be limited by 42 U.S.C. Section 9620(j)(2), Executive Order 12580, or other applicable national security regulations or federal law.

## 26. PUBLIC PARTICIPATION AND COMMUNITY RELATIONS

26.1 The Parties agree that any proposed remedial action alternative(s) and plan(s) for remedial action at the Site arising out of this Agreement shall comply with the administrative record and public participation requirements of CERCLA Sections 113(k) and 117, 42 U.S.C. Sections 9313(k) and 9617, relevant community relations provisions in the NCP, EPA guidances, and, to the extent they may apply, State statutes and regulations. The State agrees to inform the Air Force of all State requirements which it believes pertain to public participation. The provisions of this Section shall be carried out in a manner consistent with, and shall fulfill the intent of, Section 17 (Statutory Compliance/RCRA-CERCLA Integration).

26.2 The Air Force shall develop and implement a community relations plan (CRP) addressing the environmental activities and elements of work undertaken by the Air Force pursuant to this Agreement.

26.3 The Air Force shall establish and maintain an administrative record at a place, at or near the federal facility, which is freely accessible to the public, which record shall provide the documentation supporting the selection of each response action. The administrative record shall be established and maintained in accordance with relevant provisions in CERCLA, the NCP, and EPA guidances. A copy of each document placed in the administrative record, not already provided, will be provided by the Air Force to the other Parties. The administrative record developed by the Air Force shall be updated and new documents supplied to the other Parties on at least a quarterly basis. An index of documents in the administrative record will accompany each update of the administrative record.

26.4 Except in case of an emergency, any Party issuing a press release with reference to any of the work required by this Agreement shall advise the other Parties of such press release and the contents thereof, at least 48 hours prior to issuance.

## 27. FIVE YEAR REVIEW

27.1 Consistent with 42 U.S.C. Section 9621(c) and in accordance with this Agreement, if the selected remedial action results in any hazardous substances, pollutants or contaminants remaining at the Site, the Parties shall review the remedial action program at least every five (5) years after the initiation of the final remedial action to assure that human health and the environment are being protected by the remedial action being implemented.

27.2 If, upon such review, any of the Parties proposes additional work or modification of work, such proposal shall be handled under Subsection 7.10 of this Agreement.

27.3 To synchronize the five-year reviews for all operable units and final remedial actions, the following procedure will be used: Review of operable units will be conducted every five years counting from the initiation of the first operable unit, until initiation of the final remedial action for the Site. At that time a separate review for all operable units shall be conducted. Review of the final remedial action (including all operable units) shall be conducted every five years, thereafter.



## 28. TRANSFER OF REAL PROPERTY

28.1 The Air Force shall not transfer any real property comprising the federal facility except in compliance with Section 120(h) of CERCLA, 42 U.S.C. Section 9620(h). Prior to any sale of any portion of the land comprising the federal facility which includes an area within which any release of hazardous substance has come to be located, the Air Force shall give written notice of that condition to the buyer of the land. At least thirty (30) days prior to any conveyance subject to Section 120(h) of CERCLA, the Air Force shall notify all Parties of the transfer of any real property subject to this Agreement and the provisions made for any additional remedial actions, if required.

28.2 Until six months following the effective date of the final regulations implementing CERCLA Section 120(h)(2), 42 U.S.C. Section 9620(h)(2), the Air Force agrees to comply with the most recent version of the regulations as proposed and all other substantive and procedural provisions of Section 120(h) and Subsection 28.1 of this Agreement.

## 29. AMENDMENT OR MODIFICATION OF AGREEMENT

29.1 This Agreement can be amended or modified solely upon written consent of all Parties. Such amendments or modifications may be proposed by any Party and shall be effective the third business day following the day the last Party to sign the amendment or modification sends its notification of signing to the other Parties. The Parties may agree to a different effective date.

### 30. TERMINATION OF THE AGREEMENT

30.1 The provisions of this Agreement shall be deemed satisfied and terminated upon receipt by the Air Force of written notice from EPA, with concurrence of the State that the Air Force has demonstrated that all the terms of this Agreement have been completed. If EPA denies or otherwise fails to grant a termination notice within ninety (90) days of receiving a written Air Force request for such notice, EPA shall provide a written statement of the basis for its denial and describe the Air Force actions which, in the view of EPA, would be a satisfactory basis for granting a notice of completion. Such denial shall be subject to dispute resolution.

30.2 This provision shall not affect the requirements for periodic review at maximum five year intervals of the efficacy of the remedial actions.

### 31. COVENANT NOT TO SUE AND RESERVATION OF RIGHTS

31.1 In consideration for the Air Force's compliance with this Agreement, and based on the information known to the Parties or reasonably available on the effective date of this Agreement, EPA, the Air Force, and the State agree that compliance with this agreement shall stand in lieu of any administrative, legal, and equitable remedies against the Air Force available to them regarding the releases or threatened releases of hazardous substances including hazardous wastes, pollutants or contaminants at the Site which are the subject of any RI/FS conducted pursuant to this Agreement and which have been or will be adequately addressed by the remedial actions provided for under this Agreement.

31.2 Notwithstanding this Section, or any other Section of this Agreement, the State shall retain any statutory right it may have to obtain judicial review of any final decision of the EPA on selection of remedial action pursuant to any authority the State may have under CERCLA, including Sections 121(e)(2), 121(f), 310, and 113.

## 32. OTHER CLAIMS

32.1 Nothing in this Agreement shall constitute or be construed as a bar or release from any claim, cause of action or demand in law or equity by or against any person, firm, partnership or corporation not a signatory to this Agreement for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous waste, pollutants, or contaminants found at, taken to, or taken from the federal facility. Unless specifically agreed to in writing by the Parties, EPA and the State shall not be held as a party to any contract entered into by the Air Force to implement the requirements of this Agreement.

### 33. RECOVERY OF EPA EXPENSES

33.1 The Parties agree to amend this Agreement at a later date in accordance with any subsequent national resolution of the issue of cost reimbursement. Pending such resolution, EPA reserves any rights it may have with respect to cost reimbursement.

#### 34. STATE SUPPORT SERVICES

34.1 The Air Force agrees to request funding and reimburse the State, subject to the conditions and limitations set forth in this Section, and subject to Section 15 (Funding), for all reasonable costs it incurs in providing services in direct support of the Air Force's environmental restoration activities pursuant to this Agreement at the Site.

34.2 Reimbursable expenses shall consist only of actual expenditures required to be made and actually made by the State in providing the following assistance to Mather Air Force Base:

(a) Timely technical review and substantive comment on reports or studies which the Air Force prepares in support of its response actions and submits to the State.

(b) Identification and explanation of unique State requirements applicable to military installations in performing response actions, especially State applicable or relevant and appropriate requirements (ARARs).

(c) Field visits to ensure cleanup activities are implemented in accordance with appropriate State requirements, or in accordance with agreed upon conditions between the State and the Air Force that are established in the framework of this Agreement.

(d) Support and assistance to the Air Force in the conduct of public participation activities in accordance with federal and State requirements for public involvement.

(e) Participation in the review and comment functions of Air Force Technical Review Committees.

(f) Other services specified in this Agreement.

34.3 Within ninety (90) days after the end of each quarter of the federal fiscal year, the State shall submit to the Air Force an accounting of all State costs actually incurred during that quarter in providing direct support services under this Section. Such accounting shall be accompanied by cost summaries and be supported by documentation which meets federal auditing requirements. The summaries will set forth employee-hours and other expenses by major type of support service. All costs submitted must be for work directly related to implementation of this Agreement and not inconsistent with either the National Contingency Plan (NCP) or the requirements described in OMB Circulars A-87 (Cost Principles for State and Local Governments) and A-128 (Audits for State and Local Co-

operative Agreements with State and Local Governments) and Standard Forms 424 and 270. The Air Force has the right to audit cost reports used by the State to develop the cost summaries. Before the beginning of each fiscal year, the State shall supply a budget estimate of what it plans to do in the next year in the same level of detail as the billing documents.

34.4 Except as allowed pursuant to Subsections 34.5 or 34.6 below, within ninety (90) days of receipt of the accounting provided pursuant to Subsection 34.3 above, the Air Force shall reimburse the State in the amount set forth in the accounting.

34.5 In the event the Air Force contends that any of the costs set forth in the accounting provided pursuant to Subsection 34.3 above are not properly payable, the matter shall be resolved through a bilateral dispute resolution process set forth at Subsection 34.9 below.

34.6 The Air Force shall not be responsible for reimbursing the State for any costs actually incurred in the implementation of this Agreement in excess of one percent (1%) of the Air Force total lifetime project costs incurred through construction of the remedial action(s). This total reimbursement limit is currently estimated to be a sum of \$380,000.00 over the life of the Agreement. Circumstances could arise whereby fluctuations in the Air Force estimates or actual final costs through the construction of the final remedial action creates a situation where the State receives reimbursement in excess of one percent of these costs. Under these circumstances, the State remains entitled to payment for services rendered prior to the completion of a new estimate if the services are within the ceiling applicable under the previous estimate.

(a) Funding of support services must be constrained so as to avoid unnecessary diversion of the limited Defense Environmental Restoration Account funds available for the overall cleanup, and

(b) Support services should not be disproportionate to overall project costs and budget.

34.7 Either the Air Force or the State may request, on the basis of significant upward or downward revisions in the Air Force's estimate of its total lifetime costs through construction used in subsection 34.6 above, a renegotiation of the cap. Failing an agreement, either the Air Force or the State may initiate dispute resolution in accordance with subsection 34.9 below.

34.8 The State agrees to seek reimbursement for its expenses solely through the mechanisms established in this Section, and reimbursement provided under this Section shall be in settlement of any claims for State response costs relative to the Air Force's environmental restoration activities at the Site.



34.9 Section 12 (Dispute Resolution) notwithstanding, this subsection shall govern any dispute between the Air Force and the State regarding the application of this Section or any matter controlled by this Section including, but not limited to, allowability of expenses and limits on reimbursement. While it is the intent of the Air Force and the State that these procedures shall govern resolution of disputes concerning State reimbursement, informal dispute resolution is encouraged.

(a) The Air Force and State Project Managers shall be the initial points of contact for coordination of dispute resolution under this Subsection.

(b) If the Air Force and State Project Managers are unable to resolve a dispute, the matter shall be referred to the Deputy Chief of Staff for Engineering and Services, Headquarters Air Training Command, or his designated representative, and the Chief of the Site Mitigation Unit, DHS Region 1, as soon as practicable, but in any event within five (5) working days after the dispute is elevated by the Project Managers.

(c) If the Deputy Chief of Staff for Engineering and Services, Headquarters Air Training Command, and the Chief of the Site Mitigation Unit are unable to resolve the dispute within ten (10) working days, the matter shall be elevated to the Chief Deputy Director, DHS, and the Deputy Assistant Secretary of the Air Force for Environment, Safety, and Occupational Health.

(d) In the event the Chief Deputy Director and the Deputy Assistant Secretary of the Air Force are unable to resolve a dispute, the State retains any legal and equitable remedies it may have to recover its expenses. In addition, the State may withdraw from this Agreement by giving sixty (60) days notice to the other Parties.

34.10 Nothing herein shall be construed to limit the ability of the Air Force to contract with the State for technical services that could otherwise be provided by a private contractor including, but not limited to:

(a) Identification, investigation, and cleanup of any contamination beyond the boundaries of Mather Air Force Base;

(b) Laboratory analysis; or

(c) Data collection for field studies.

34.11 Nothing in this Agreement shall be construed to constitute a waiver of any claims by the State for any expenses incurred prior to the effective date of this Agreement.

34.12 The Air Force and the State agree that the terms and conditions of this Section shall become null and void when the State enters into a Defense/State Memorandum of Agreement (DSMOA) with the Department of Defense (DOD) which addresses State reimbursement.

## 35. STATE PARTICIPATION CONTINGENCY

35.1 If the State fails to sign this Agreement within thirty (30) days of notification of the signature by both EPA and the Air Force, this Agreement will be interpreted as if the State were not a Party and any reference to the State in this Agreement will have no effect. In addition, all other provisions of this Agreement notwithstanding, if the State does not sign this Agreement within the said thirty (30) days, Mather AFB shall only have to comply with any State requirements, conditions, or standards, including those specifically listed in this Agreement, which Mather AFB would otherwise have to comply with absent this Agreement.

35.2 In the event that the State does not sign this Agreement:

(a) the Air Force agrees to transmit all primary and secondary documents to appropriate State agencies at the same time such documents are transmitted to EPA; and

(b) EPA intends to consult with the appropriate State agencies with respect to the above documents and during implementation of this Agreement.

### 36. EFFECTIVE DATE AND PUBLIC COMMENT

36.1 The provisions of this Section shall be carried out in a manner consistent with, and shall fulfill the intent of Section 17 (Statutory Compliance/RCRA-CERCLA Integration).

36.2 Within fifteen (15) days of the date of the execution of this Agreement, the Air Force shall announce the availability of this Agreement to the public for a forty-five (45) day period of review and comment, including publication in at least two major local newspapers of general circulation. The procedures of 40 CFR Part 124.10(c) regarding persons to be notified, and Part 124.10(d) regarding contents of the notice, shall apply. Comments received shall be transmitted promptly to the other Parties after the end of the comment period. The Parties shall review such comments and shall either:

(a) Determine that this Agreement should be made effective in its present form, in which case EPA shall promptly notify all Parties in writing, and this Agreement shall become effective on the date that Mather AFB receives such notification; or

(b) If the determination in subsection 36.2(a) is not made, the Parties shall meet to discuss and agree upon any proposed changes. If the Parties do not mutually agree on all needed changes within fifteen (15) days from the close of the public comment period, the Parties shall submit their written notices of position, concerning those provisions still in dispute, directly to the Dispute Resolution Committee, and the procedures of Section 12 (Dispute Resolution) shall be applied to the disputed provisions. Upon resolution of any proposed changes, the Agreement, as modified, shall be re-executed by the Parties, with EPA signing last, and shall become effective) on the date that it is signed by EPA.

36.3 Any response action underway upon the effective date of this Agreement shall be subject to oversight by the Parties.

### 37. BASE CLOSURE

37.1 Closure of the federal Facility will not affect the Air Force's obligation to comply with the terms of this Agreement and to specifically ensure the following:

(a) Continuing rights of access for EPA and the State in accordance with the terms and conditions of Section 25 (Access);

(b) Availability of a Project Manager to fulfill the terms and conditions of the Agreement;

(c) Designation of alternate DRC members as appropriate for the purposes of implementing Section 12 (Dispute Resolution); and

(d) Adequate resolution of any other problems identified by the Project Managers regarding the effect of base closure on the implementation of this Agreement.

37.2 Base closure will not constitute a Force Majeure under Section 10 (Force Majeure), nor will it constitute good cause for extensions under Section 9 (Extensions), unless mutually agreed by the Parties.

## 38. APPENDICES AND ATTACHMENTS

38.1. Appendices shall be an integral and enforceable part of this Agreement. They shall include the most current versions of:

- (a) Deadlines previously established.
- (b) Outline of Topics to be Addressed in Mather AFB RI/FS Workplan.
- (c) All final primary and secondary documents which will be created in accordance with Section 7 (Consultation); and
- (d) All deadlines which will be established in accordance with Section 8 (Deadlines) and which may be extended in accordance with Section 9 (Extensions).

38.2 Attachments shall be for information only and shall not be enforceable parts of this Agreement. The information in these attachments is provided to support the initial review and comment upon this Agreement, and they are only intended to reflect the conditions known at the signing of this Agreement. None of the facts related therein shall be considered admissions by, nor are they legally binding upon, any Party with respect to any claims unrelated to, or persons not a Party to, this Agreement. They shall include:

- (a) Map of Federal Facility
- (b) Toxicity of significant substances found at Mather Air Force Base
- (c) Statement of Facts
- (d) List of Final Primary Documents and Documents Under Review.
- (e) Installation Restoration Program Activities

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Each undersigned representative of a Party certifies that he or she is fully authorized to enter into the terms and conditions of this Agreement and to legally bind such Party to this Agreement.

IT IS SO AGREED:

UNITED STATES AIR FORCE

BY: *Robert S. Delligatti*  
ROBERT S. DELIGATTI, Major General, USAF  
Vice Commander, Air Training Command

*20 July 89*  
DATE

BY: *John R. Morrison, Jr.*  
JOHN R. MORRISON, JR., Colonel, USAF  
Commander, 323 Flying Training Wing

*21 Jul 89*  
DATE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BY: *Daniel W. McGovern*  
DANIEL W. MCGOVERN  
Regional Administrator, Region IX  
U. S. Environmental Protection Agency

*7/21/89*  
DATE

CALIFORNIA DEPARTMENT OF HEALTH SERVICES

BY: *Alex R. Cunningham*  
ALEX CUNNINGHAM, CHIEF DEPUTY DIRECTOR  
Toxic Substances Control Division

*21 July 89*  
DATE



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

Anthony Wong  
BRAC Environmental Coordinator  
Air Force Base Conversion Agency  
10503 Kaydet Ave.  
Mather, CA 95655

May 3, 1996

Dear Mr. Wong,

Pursuant to Section 7.7 (b) of the Federal Facilities Agreement, EPA requests a five day extension for review and comment on the Additional Site Characterization RI Report. Comments will be provided to you on or before May 24, 1996.

This extension may affect the schedule for the Final OU Feasibility Study, Proposed Plan, and Record of Decision.

Sincerely,

A handwritten signature in cursive script, appearing to read "Debbie Lowe".

Debbie Lowe  
Remedial Project Manager

cc: Kent Strong, DTSC





1830 64

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street  
San Francisco, Ca. 94105

10 OCT RECD

CERTIFIED MAIL NO. P 057 506 808  
RETURN RECEIPT REQUESTED

October 6, 1989

Richard A. Blank, Lt Col, USAF  
Environmental Management Office  
323rd Flying Training Wing  
Mather AFB, CA 95655-5000

Dear Lt Col Blank:

Pursuant to the terms of Section 36 (Effective Date and Public Comment) within the Federal Facility Agreement (FFA) under CERCLA Section 120 for Mather AFB signed July 21, 1989, the FFA is hereby declared effective on the date of your receipt of this letter.

During the October 3, 1989 Technical Review Committee meeting held at Mather AFB, representatives of the U.S. Air Force, the California Department of Health Services, and EPA agreed to make the FFA effective in its present form, as no public comment was received concerning the document.

Pursuant to FFA Section 8 (Deadlines), the Air Force has twenty-one (21) days from the effective date to propose deadlines for the completion of the draft primary documents delineated in Section 8.

In addition, pursuant to the FFA Section 18 (Project Managers) EPA is hereby notifying all Parties that the EPA Project Manager is John Chesnutt. The alternate Project Manager is Roberta Blank. Pursuant to FFA Section 21 (Notification), all documents or submittals to EPA shall be addressed as follows:

Mr. John Chesnutt  
Remedial Project Manager (H-7-3)  
U.S. Environmental Protection Agency  
Region 9  
Hazardous Waste Management Division  
215 Fremont Street  
San Francisco, CA 94105

If you have any questions regarding this letter, please contact John Chesnutt at 415-974-8940.

Sincerely,

Julie Anderson  
Chief, Federal Enforcement Section

cc: Lt Col Jose L. Saenz, HQ ATC  
Tracie Billington, DHS  
Bob Matteoli, CRWQCB CVR

## APPENDIX A

## DEADLINES PREVIOUSLY ESTABLISHED

In accordance with Section 8.1 of this Agreement, the following deadlines for submission of draft primary documents have been agreed upon by the Parties before the effective date of this Agreement:

1. RI/FS Work Plan for AC&W site, including Sampling and Analysis Plan      Deadline: June 15, 1989\*
2. Quality Assurance Project Plan (QAPP) for AC&W Site      Deadline: June 15, 1989\*
3. Community Relations Plan      Deadline: July 10, 1989\*
4. RI/FS Work Plan for remainder of Site (other than AC&W), including Sampling and Analysis Plan; and a preliminary projection of target dates for associated RI/FS tasks\*\*      Deadline: Jan. 16, 1990
5. Quality Assurance Project Plan (QAPP) for remainder of Site (other than AC&W)      Deadline: Jan. 16, 1990

\* The Parties agree that, for the purpose of formally initiating the review and comment period set forth in Section 7.7 of this Agreement (Review and Comment on Draft Documents), the effective date of this Agreement shall be deemed the deadline for issuance of the draft RI/FS Work Plan for the AC&W site, the draft QAPP for the AC&W site, and the draft Community Relations Plan.

\*\* The projected target dates to be submitted with the RI/FS Workplan shall be subject to revision by the Project Managers in accordance with Subsection 18.3, and shall not be subject to Section 9 (Extensions) or 13 (Enforceability) of this Agreement.

**MATHER AFB IRP DOCUMENT STATUS**  
Current Schedule for Document Delivery and Review

**NON-CERCLA Documents:**

<b>Document</b>	<b>Draft</b>	<b>Comments Due</b>	<b>Draft Final</b>	<b>Final</b>
RCRA Closure Report (non-IRP document; has relevance to IRP Site 39)	11/3/95	pending		
Technical Plan and QPP, Sites 34, 35, & 36	3/24/97	5/16/97	6/13/97	7/13/97
O&M Manual Sites 35, 36	2/27/98	4/27/98		6/10/98(k)
O&M Manual Site 34	4/14/98	6/15/98		7/13/98
Technical ITIR Sites 34, 35, 36	4/15/98	6/15/98		7/17/98

**Bioventing Sites**

Bioventing System Installation Report, Site 19, 2595, and 18015	12/12/97	2/10/98	4/13/98(c)	6/22/98(i)
Site 19 O&M Manual	5/21/97	7/20/97	9/18/97	12/1/97(c)

**Tank Removal Sites**

UST Removal Reports, Sites 20, 2527, 2527B, 4540, and 10052	12/12/97	2/10/98	4/13/98(c)	6/22/98(i)
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(c) Only AF comments received

(i) Based on verbal notification of no comments to be received at 4/22/98 BCT meeting

(k) RWQCB comments received 6/2/98

## Mather Air Force Base Installation Restoration Program

## Basewide Operable Unit Record of Decision Consensus Statement, 6/19/98

The remedial project managers have mutually agreed to modify the document schedule for the finalization of the Basewide Operable Unit Record of Decision (ROD). The Draft Final ROD, dated 1 June 1998, is scheduled to become final on 30 June 1998. However, the remedial project managers have mutually agreed to allow additional time for the California Department of Fish and Game to review the ecological risk assessment for IRP Site 87. The review will be completed on 15 July. If any concerns can be resolved by issuing change pages to the Draft Final ROD quickly, this will be done by 1 August 1998, and the ROD will be considered Final as of 15 August 1998 (there will have been at least 30 days for review of all unchanged portions of the Draft Final ROD prior to finalization).

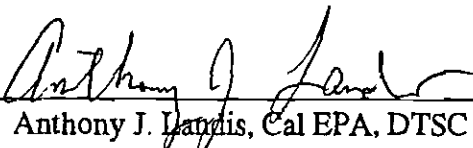
This consensus statement is made under Section 9.2 (g) of the FFA, requiring mutual agreement of the FFA parties as to good cause for the extension.

  
\_\_\_\_\_  
Anthony C. Wong, AFBCA/DB-Mather

6/19/98  
Date

  
\_\_\_\_\_  
Kathleen Salyer, U.S. EPA Region IX

6/19/98  
Date

  
\_\_\_\_\_  
Anthony J. Landis, Cal EPA, DTSC

6-22-98  
Date

## Mather Air Force Base Installation Restoration Program

## Basewide Operable Unit Record of Decision Consensus Statement, 5/18/98

The remedial project managers have mutually agreed to modify the document schedule for the finalization of the Basewide Operable Unit Record of Decision (ROD). The current documented delivery date for the Draft Final ROD is 18 May 1998. The Draft Final ROD will instead be issued for receipt the morning of 1 June 1998, and will become final on 30 June 1998 subject to the terms of the Federal Facility Agreement for Mather AFB, sections 7.9 and 12.2.


This consensus statement is made under Section 9.2 (g) of the FFA, requiring mutual agreement of the FFA parties as to good cause for the extension.

  
\_\_\_\_\_  
Anthony C. Wong, AFBCA/DB-Mather

5/29/98  
Date

  
\_\_\_\_\_  
Kathleen Salyer, U.S. EPA Region IX

5/29/98  
Date

  
\_\_\_\_\_  
Anthony J. Landis, Cal EPA, DTSC

6-1-98  
Date

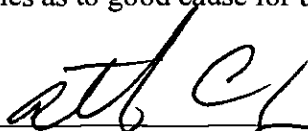
## Mather Air Force Base Installation Restoration Program

## Basewide Operable Unit Record of Decision Consensus Statement, 3/12/98

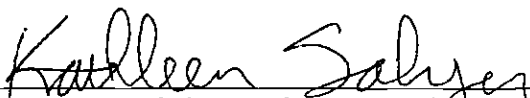
The remedial project managers have mutually agreed to modify the document schedule for the finalization of the Basewide Operable Unit Record of Decision (ROD). The current documented delivery date for the Draft Final ROD is 6 March 1998, although a date of 27 April was agreed to by the Remedial Project Managers at a comment resolution meeting on 23 February 1998. During the BRAC Cleanup Team meeting on 12 March 1998, the Remedial Project Managers agreed to conduct an additional review of an interim draft final copy of the ROD incorporating responses to comments prior to the issuance of the Draft Final document. The schedule for the additional review is hereby established:

Issuance of interim draft final revision	27 March 1998
Comments due on interim draft final revision	13 April 1998
Draft Final ROD issuance	4 May 1998
ROD becomes final	3 June 1998

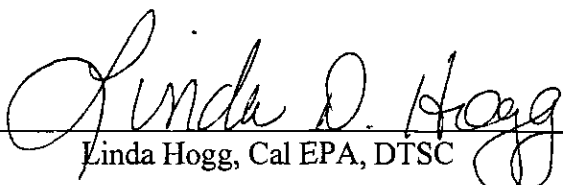
This request is made under Section 9.2 (g) of the FFA, requiring mutual agreement of the FFA parties as to good cause for the extension.

  
 \_\_\_\_\_  
 Anthony C. Wong, AFBCA/DB-Mather

3/12/98  
 Date

  
 \_\_\_\_\_  
 Kathleen Salyer, U.S. EPA Region IX

3/12/98  
 Date

  
 \_\_\_\_\_  
 Linda Hogg, Cal EPA, DTSC

3-12-98  
 Date

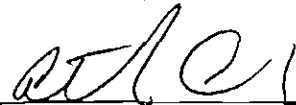
## Mather Air Force Base Installation Restoration Program

## Basewide Operable Unit Record of Decision Consensus Statement, 1/16/98

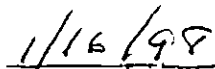
The remedial project managers have mutually agreed to modify the document schedule for the finalization of the Basewide Operable Unit Record of Decision (ROD). The current delivery date for the Draft Final ROD is 20 January 1998. During the BRAC Cleanup Team meeting on 3-4 December 1997, the remedial project managers agreed to conduct an additional review of a 'red-line/ strike-out' copy of the ROD incorporating responses to comments prior to the issuance of the Draft Final document. The schedule for the additional review is hereby established:

Issuance of red-line/ strike-out revision	28 January 1998
Comments due on red-line/ strike-out revision	11 February 1998
Conference call to discuss comments	tentative date 13 February 1998
Last date to make changes	19 February 1998
Draft Final ROD issuance	6 March 1998
ROD becomes final	5 April 1998

This request is made under Section 9.2 (g) of the FFA, requiring mutual agreement of the FFA parties as to good cause for the extension.



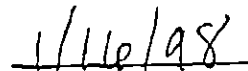
Anthony C. Wong, AFBCA/DB-Mather



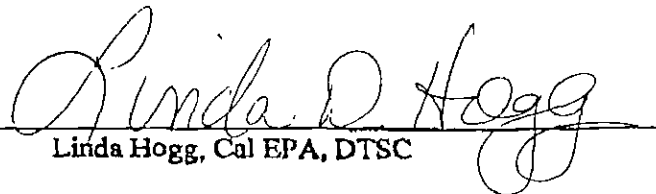
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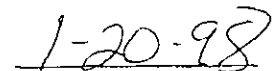
Kathleen Salyer, U.S. EPA Region IX



Date



Linda Hogg, Cal EPA, DTSC



Date

**Mather Air Force Base Installation Restoration Program****Off-Base Water Supply Contingency Plan Consensus Statement, 12/23/97**

The remedial project managers have mutually agreed to modify the document schedule for the finalization of the Second Cycle Draft Final Mather AFB Off-Base Water Supply Contingency Plan (Plan). The Dispute Resolution Committee completed their dispute resolution agreement on December 2, 1997. The Federal Facility Agreement under CERCLA Section 129 for Mather Air Force Base, Section 12.10, requires the Plan to be amended to incorporate the resolution and final determination within 21 days (i.e. 23 December 1997).

The deadline for issuing the amended Plan is hereby extended until January 9, 1998. The Plan will be issued as Revised Second Cycle Draft Final, with a 30-day period for the Draft Final Plan to become final. This will allow time for the parties to review the amended Plan prior to the Plan being issued as a final document for public review. The Plan would then become final on February 9, 1998. This extension is made under Section 9.2 (g) of the Mather Federal Facility Agreement.

  
\_\_\_\_\_  
Anthony C. Wong, AFBCA/DB-Mather

12/23/97  
Date

  
\_\_\_\_\_  
Kathleen Salyer, U.S. EPA Region IX

12/23/97  
Date

  
\_\_\_\_\_  
Kent Strong, Cal EPA, DTSC

12/23/97  
Date



## Mather Air Force Base Installation Restoration Program

## Off-Base Water Supply Contingency Plan Consensus Statement

The State of California invoked formal dispute on July 3, 1997, under Section 12.2 of the Mather Federal Facility Agreement (FFA) concerning the Second Cycle Draft Final Mather AFB Off-Base Water Supply Contingency Plan (Contingency Plan) the date on which the Contingency Plan was to become final.

Section 12.3 of the FFA provides that prior to any Party's issuance of a written statement of a dispute, the disputing Party shall engage the other Party in informal dispute resolution among the Project Managers. Therefore, the remedial project managers have mutually agreed to modify the document schedule for the finalization of the Mather Plan. The 30-day period for the Draft Final Plan to become final is hereby extended for an additional 43 days to allow informal dispute resolution to occur prior to initiation of formal dispute by any of the parties. This extension is made under Section 9.2 (g) of the Mather FFA.

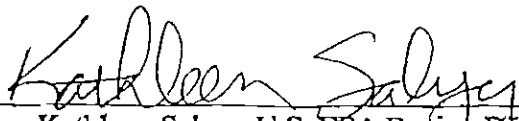
Also by mutual agreement, the dispute invoked by the State of California on July 3, 1997 is considered to be deferred until August 15, 1997. This consensus statement does not preclude any of the parties from invoking dispute under the terms of the FFA, but allows a period of informal dispute resolution. The Contingency Plan will become final on August 16 (if agreement is reached) or the formal dispute will be elevated to the Dispute Resolution Committee (DRC) unless the Parties agree that the period of informal dispute should be extended.



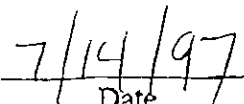
Anthony C. Wong, AFBCA/DB-Mather



Date



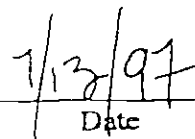
Kathleen Salyer, U.S. EPA Region IX



Date



Kent Strong, Cal EPA, DTSC



Date

Attachment 1: Revised Appendix D **MATHER AFB FEDERAL FACILITY  
AGREEMENT**

**APPENDIX D UPDATE      AUGUST 5, 1997**

<b>Document</b>	<b>Draft Due Date</b>
ESD for Site 7/11	8/8/97
RAM for Site 85	8/8/97
D.O.6 Technical Plan Amendment (Sites 56, 60, 82)	9/25/97
Remedial Action Work Plan and QPP, Phase II (D.O. 9)	9/26/97



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

26 Nov 97

MEMORANDUM FOR U.S. EPA, Region IX, Attn: Kathleen Salyer (SFD-8-1)  
DTSC, Attn: Kent Strong

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

SUBJECT: FFA Schedule Extension Request for the Draft Final Basewide Operable Unit  
Record of Decision

1. The Air Force hereby requests a 45-day extension for delivery of the Draft Final Basewide Operable Unit Record of Decision (ROD), in order to allow additional time to incorporate programmatic information and regulatory comments received after the comment period. Details follow below. This extension is not expected to result in any delays in the implementation of the remedial actions selected by the ROD.
2. This request is made under Section 9.2 (g) of the FFA, requiring mutual agreement of the FFA parties as to good cause for the extension.
3. The additional elements of the Record of Decision that warrant additional preparation time are as follows. A more in-depth discussion will be part of the agenda for the BRAC Cleanup Team meeting on December 4.
  - Documentation and evaluation of new analytical results from Site 81 demonstrating that the total petroleum hydrocarbons (TPH) reported as diesel in the Additional Site Characterization Remedial Investigation Report are in fact heavier than diesel, more akin to motor oil. This new information indicates that the TPH is not a threat to groundwater quality, and that the remedial action selected in the Draft ROD is not required.
  - Site 87 cleanup levels and background soil concentrations were questions in comments from U.S. EPA dated October 16 and November 4 after the comment period had ended October 2. Additional time is required for the Remedial Project Managers to discuss resolution of these concerns.

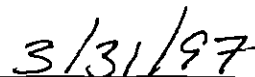
## Mather Air Force Base Installation Restoration Program

Consensus Statement for Finalization of Draft Final Basewide Operable Unit  
Focused Feasibility Study

The remedial project managers have mutually agreed to modify the finalization schedule for the Draft Final Basewide Operable Unit Focused Feasibility Study (FFS) as follows. The finalization of the FFS will be changed from 31 March until 15 April 1997. This is to allow discussion of RPM concerns on 31 March and preparation of any change pages necessary to resolve these concerns.



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Anthony C. Wong, AFBCA/DB-Mather

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Date

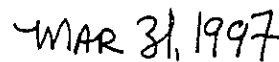
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Kathleen Salyer, U.S. EPA Region IX

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Date

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Kent Strong, Cal EPA, DTSC

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Date

## Mather Air Force Base Installation Restoration Program

Consensus Statement #2 for Finalization of Draft Final Basewide Operable  
Unit Focused Feasibility Study and Proposed Plan

The remedial project managers have mutually agreed to modify the finalization schedule for the Draft Final Basewide Operable Unit Focused Feasibility Study (FFS) as follows. The finalization of the FFS will be changed from 15 April 1997 until 29 April. This is to allow change pages to be issued on 15 April for a one-week review and resolution of any remaining concerns prior to final document production. As a result of this delay, the issuance of the Draft Final Proposed Plan will be delayed from 25 April until 6 May, with the document becoming final on 15 May. This Proposed Plan schedule will support a public comment period from 23 May until 23 June 1997.

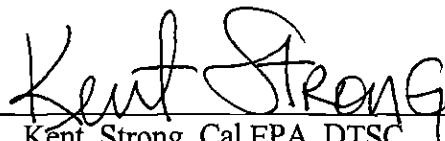
This consensus statement falls under the provisions of Section 9.2 (g) of the Federal Facility Agreement for Mather AFB.

  
\_\_\_\_\_  
Anthony C. Wong, AFBCA/DB-Mather

  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Kathleen Salyer, U.S. EPA Region IX

\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Kent Strong, Cal EPA, DTSC

  
\_\_\_\_\_  
Date

## Mather Air Force Base Installation Restoration Program

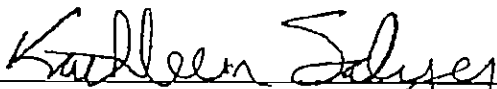
Consensus Statement for Finalization of Draft Final Basewide Operable Unit  
Focused Feasibility Study

The remedial project managers have mutually agreed to modify the finalization schedule for the Draft Final Basewide Operable Unit Focused Feasibility Study (FFS) as follows. The finalization of the FFS will be changed from 31 March until 15 April 1997. This is to allow discussion of RPM concerns on 31 March and preparation of any change pages necessary to resolve these concerns.

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Anthony C. Wong, AFBCA/DB-Mather

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Date

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Kathleen Salyer, U.S. EPA Region IX

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3/31/97

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Date

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Kent Strong, Cal EPA, DTSC

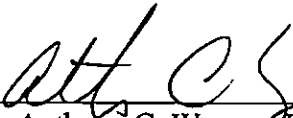
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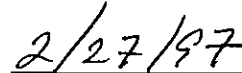
## Mather Air Force Base Installation Restoration Program

## Off-Base Water Supply Contingency Plan Consensus Statement #2

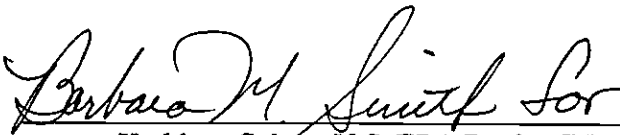
The remedial project managers have mutually agreed to modify the document schedule for the finalization of the Mather AFB Off-Base Water Supply Contingency Plan. The Air Force will issue by 4 April 1997 a revised draft of the Mather AFB Off-Base Water Supply Contingency Plan for a second, expedited, review. This document will be referred to as the "Second-Cycle Draft", and will undergo a Federal Facility Agreement (FFA) review cycle of 30 days (comments will be due 5 May 1997), a revision period of 29 days (the 'Second-Cycle Draft Final' revision will be due 3 June 1997), and the document will become final in 30 days (3 July 1997), otherwise subject to the terms of the FFA for Mather AFB.



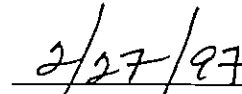
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Anthony C. Wong, AFBCA/DB-Mather

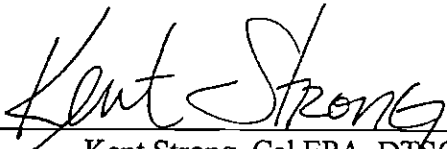
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Date

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Kathleen Salyer, U.S. EPA Region IX

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Date

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Kent Strong, Cal EPA, DTSC

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Date

## Mather Air Force Base Installation Restoration Program

## Off-Base Water Supply Contingency Plan Consensus Statement #2

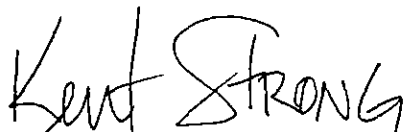
The remedial project managers have mutually agreed to modify the document schedule for the finalization of the Mather AFB Off-Base Water Supply Contingency Plan. The Air Force will issue a second draft of the Mather AFB Off-Base Water Supply Contingency Plan on 26 February 1997. This document will be referred to as the "Second Draft", and will undergo a Federal Facility Agreement (FFA) review cycle of 30 days (comments will be due 3/28/97), a revision period of 30 days (the 'Second Draft Final' revision will be due 4/28/97), and the document will become final in 15 days (5/13/97) as opposed to the usual 30 day period, otherwise subject to the terms of the FFA for Mather AFB.

  
\_\_\_\_\_  
Anthony C. Wong, AFBCA/DB-Mather

2/26/97  
Date

  
\_\_\_\_\_  
Kathleen Salyer, U.S. EPA Region IX

2/26/97  
Date

  
\_\_\_\_\_  
Kent Strong, Cal EPA, DTSC

2/26/97  
Date



## APPENDIX B

OUTLINE OF TOPICS TO BE ADDRESSED IN MATHER AFB  
REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) WORKPLAN

The following outline lists topics to be included, at a minimum, in the RI/FS Workplan for Mather AFB. The Workplan shall also include additional topics and tasks, as appropriate, set forth in the Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA (OSWER Directive 9355.5-01 Interim Final, October 1988) and applicable State law.

## I. Introduction

- Overview/Executive Summary
- Site Location
- Site Status
- Project Management

## II. Site Background and Setting

## Environmental Setting

- Climate/Meteorology
- Geography
- Geology
- Hydrology
- Surface Water
- Biotic Environment

## Site Operations and History

- Base History and Operations
- Wastes Disposed of at the Site
- Potential Source Areas
- History of Agency Involvement

## III. Initial Site Evaluation Summary

- Preliminary Investigation
- Installation Restoration Program, and other related activities
- Problem Definition
  - Chemicals of Concern
  - Potential Migration Pathways
  - Potential Receptors
  - Hazard Assessment
  - Regulatory Standards

Preliminary Identification of Response Actions

Soil  
Ground Water  
Air

Work Plan Rationale

IV. Identification of Data Requirements

Site Characterization

Transport Pathways  
Receptor Identification

Approach

Identification of Priority Areas  
Identification of Operable Units  
Determination of Vertical & Lateral Extent of  
Groundwater Contamination in Early Stages of RI  
Identification of Sources in Later Stages of RI

V. Remedial Investigation Scope of Work

Study Area Survey

On- & Off-Site Well Inventory and Abandoned Well Survey  
Receptor Identification

Study Area Characterization

Climatological Data  
Hydrogeological Investigation  
Additional Monitoring Wells and Borings  
Groundwater Monitoring  
Ground Water Investigation  
Soils Investigation  
Landfill(s) Investigation  
Waste Pit(s) Investigation  
Sump and Sewer Line(s) Investigation  
Drainage Ditch(es) Investigation  
Degreasing Operations Investigation  
Storage and Maintenance Areas(s) Investigation  
Fire Training Area(s) Investigation  
Spill Area(s) Investigation  
Underground Tank(s) Investigation

Treatability Study Testing (as appropriate)

Sample Data Validation  
Data Evaluation Management  
Risk Assessment

Additional Investigations  
Remedial Investigation Report

- VI. Feasibility Study Scope of Work
  - Response Actions
    - Source Control Plan (e.g., soils)
    - Alternate Drinking Water Supply
  - Operable Unit(s)
    - Source Control Plan (e.g., soils)
    - Ground Water Treatment Plan
  - Development of Remedial Action Alternatives
    - Response Definition
    - Identification & Screening of Remedial Technologies
    - Development of Remedial Alternatives
  - Initial Screening of Alternatives
    - Effectiveness Evaluation
    - Implementability Evaluation
    - Cost Evaluation
  - Detailed Development of Alternatives
  - Detailed Analysis of Alternatives
  - Feasibility Study Reports
- VII. Schedule
- VIII. References

**Appendix D Revision****Mather AFB**

Proposed 13 August 1999; responses due by close of business 20 August 1999

**Document****Draft Document Due Date**

BRAC Cleanup Plan

15 September 1999

Operable Unit 6 Focused Feasibility  
Study ReportRevised Draft 20 September 1999 (proposed 43-  
day regulatory review and 26-day document  
revision)

Operable Unit 6 Proposed Plan

13 December 1999 (proposed 30-day regulatory  
review and 15-day document revision and  
finalization to allow public comment period  
during February and March 2000)

Record of Decision

14 April 2000



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

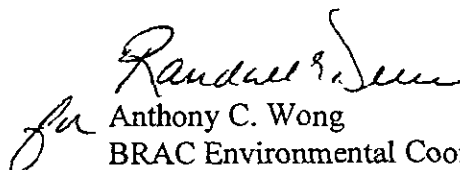
13 Aug 99

MEMORANDUM FOR DISTRIBUTION

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

SUBJECT: Federal Facility Agreement Appendix D: Proposed Revision to Document Schedule  
for Supplemental Basewide Operable Unit

1. The attached 'Appendix D' document schedule is proposed to extend the delivery dates for the Feasibility Study, Proposed Plan, and Record of Decision for the Supplemental Basewide Operable Unit, per Section 9 of the Federal Facility Agreement for Mather Air Force Base. This schedule was verbally agreed to by the remedial project managers at the 11 August 99 BRAC Cleanup Team meeting for Mather Air Force Base.
2. Also included on the attached proposed Appendix D document schedule is a new delivery date for the Draft Revised Base Cleanup Plan (BCP), as described in Section 2.2.10 of the Basewide Operable Unit Record of Decision. The BCP will be updated and expanded to incorporate a guide to the operation and maintenance program for all Installation Restoration Program sites at Mather.
3. These changes are requested under Section 9.2(g), requiring mutual agreement by the parties that there is good cause for the schedule adjustment. If there is no objection by the parties to the FFA within seven days of this request, the requested schedule will be in effect according to Section 9.4 of the FFA.
4. Questions should be addressed to Bill Hughes, Waste Policy Institute, at (916) 364-4007.

  
for Anthony C. Wong  
BRAC Environmental Coordinator

Attachment: Proposed Appendix D

DISTRIBUTION:

U.S. EPA, Attn: Kathleen Salyer (SFD-8-1)  
CA DTSC, Attn: Carolyn Tatoian-Cain

cc:

CA CVRWQCB, Attn: James Taylor  
CA IWMB, Attn: Glenn Young  
Sacramento County, Attn: Dave Norris  
RAB Co-chair, Attn: Robert Coughran  
AFBCA/EV, Attn: Frank Duncan  
AFCEE/ERB, Attn: Ralph Rosales  
AFCEE/ERB, Attn: Paul Bernheisel  
IT Corporation, Attn: Tony Searls

**Appendix D Revision****Mather AFB**

Proposed 13 August 1999; responses due by close of business 20 August 1999

**Document****Draft Document Due Date**

BRAC Cleanup Plan

15 September 1999

Operable Unit 6 Focused Feasibility  
Study ReportRevised Draft 20 September 1999 (proposed 43-  
day regulatory review and 26-day document  
revision)

Operable Unit 6 Proposed Plan

13 December 1999 (proposed 30-day regulatory  
review and 15-day document revision and  
finalization to allow public comment period  
during February and March 2000)

Record of Decision

14 April 2000

Mather Air Force Base Installation Restoration Program

Consensus Statement #2 for Finalization of Draft Final Basewide Operable  
Unit Focused Feasibility Study and Proposed Plan

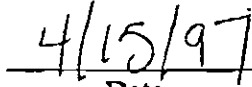
The remedial project managers have mutually agreed to modify the finalization schedule for the Draft Final Basewide Operable Unit Focused Feasibility Study (FFS) as follows. The finalization of the FFS will be changed from 15 April 1997 until 29 April. This is to allow change pages to be issued on 15 April for a one-week review and resolution of any remaining concerns prior to final document production. As a result of this delay, the issuance of the Draft Final Proposed Plan will be delayed from 25 April until 6 May, with the document becoming final on 15 May. This Proposed Plan schedule will support a public comment period from 23 May until 23 June 1997.

This consensus statement falls under the provisions of Section 9.2 (g) of the Federal Facility Agreement for Mather AFB.

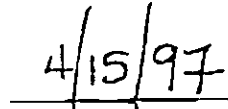
  
\_\_\_\_\_  
Anthony C. Wong, AFBCA/DB-Mather

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Kathleen Salyer, U.S. EPA Region IX

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Kent Strong, Cal EPA, DTSC

  
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Date





DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

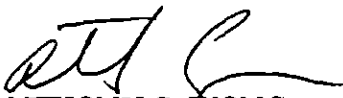
23 Jun 99

MEMORANDUM FOR DISTRIBUTION

FROM: AFBCA/Div. A, Mather  
10503 Armstrong Avenue  
Mather, CA 95655

SUBJECT: Transmittal of Evaluation of *Chironomus Tentans* Survival in Sediments from  
Mather IRP Sites 80 and 88, Supplemental Basewide Operable Unit

1. Transmitted by copy of this letter please find the Evaluation of *Chironomus tentans* Toxicity Results from Mather Air Force Base Sediments. The evaluation was conducted as recommended by Ned Black, U.S. EPA, and Buzz Chernoff, CA F&G. Please consider this evaluation during review of the Draft Supplemental Basewide Operable Unit Focused Feasibility Study (FFS), and the Removal Action Memorandum for Sites 80 and 88 (RAM). Due to the limited review period remaining on the latter two documents, the review period for the Draft FFS is hereby extended to July 15; this represents a 30-day extension, as afforded the agencies by the Federal Facilities Agreement upon notification to the Air Force. As notification was received for an extension to June 30, and Linda Hogg, DTSC, verbally concurred that the remainder of the 30-day period is necessary, I am hereby documenting that the full 30-day extension is in effect.
2. Questions should be addressed to Bill Hughes at (916) 364-4007.

  
ANTHONY C. WONG  
BRAC Environmental Coordinator

Attachments: Draft Final Basewide OU Proposed Plan  
Consensus statement

DISTRIBUTION

HQ AFBCA/DB, Attn: Frank Duncan  
HQ AFCEE/ERB, Attn: Ralph Rosales  
AFCEE/ERB, Attn: Paul Bernheisel  
U.S. EPA, Region IX, Attn: Kathleen Salyer (SFD-8-1)  
DTSC, Attn: Linda Hogg  
RWQCB, Attn: James Taylor  
CA F&G, Attn: Buzz Chernoff  
Sacramento County, Attn: David Norris  
TechLaw, Attn: Heike Mueller



Winston H. Hickox  
Secretary for  
Environmental  
Protection

## Department of Toxic Substances Control

Edwin F. Lowry, Director  
10151 Croydon Way, Suite 3  
Sacramento, California 95827-2106

1830 90



Gray Davis  
Governor

May 12, 1999

Mr. Anthony C. Wong  
BRAC Environmental Coordinator  
AFBCA/DA  
10503 Armstrong Avenue  
Mather, California 95655

### REQUEST FOR TIME EXTENSION ON DOCUMENT REVIEW

Dear Mr. Wong:

The Department of Toxic Substances Control (DTSC) is requesting a time extension per Section 9 of the Interagency Agreement to review several documents. According to the last Document Status Report List, the following documents have comments due on or near the end of May and the beginning of June:

	<b>Due Date</b>	<b>Extension Request</b>
Sites 18, 23, & 59 Removal PER	5/24/99	6/11/99
Closure Report Sites 15,20,85, 86, &87	5/28/99	6/21/99
1998 Annual Groundwater Report	5/31/99	6/30/99
Supplemental Basewide Focused Feasibility Study	6/15/99	6/30/99

The extension request is due to my impending departure as the current Remedial Project Manager (RPM) for DTSC, and the need to focus on finalizing high priority documents for both Mather AFB and McClellan AFB, which I am also involved with. The Regional Water Quality Control Board has also indicated that due to the absence of their RPM, James Taylor, they will also need an extension for the Vadose Zone PER and the Closure Reports. Both DTSC and RWQCB staff believe that work should not be delayed on the Vadose Zone removal actions and that based on the presentation on Thursday, May 6, 1999, the location of Soil Vapor Extraction Wells and monitoring wells as presented is acceptable.

Mr. Anthony C. Wong  
May 12, 1999  
Page 2

DTSC is making every effort to have either a replacement RPM or an interim RPM identified before the end of June so that the transition can occur as seamlessly as possible. We appreciate the Air Force's understanding and cooperation during this transition. If you have any questions concerning this request, please contact me at (916) 255-3771 or Mr. Dan Ward, Chief, Base Closing Unit at (916) 255-3676.

Sincerely,



Linda D. Hogg  
Remedial Project Manager  
Office of Military Facilities

cc: Mr. John Scott  
Montgomery Watson  
3617 DeBellevue Street, Building 2425  
Mather, California 95655

Mr. James Taylor  
Regional Water Quality Control Board  
3443 Routier Road, Suite A  
Sacramento, California 95827

Ms. Kathleen Salyer  
United States Environmental Protection Agency  
Region IX  
75 Hawthorne Street (SFD-8-1)  
San Francisco, California 94105-3901



Cal/EPA

January 23, 1998



Department of  
Toxic Substances  
Control

10151 Croydon Way  
Suite 3  
Sacramento, CA  
95827-2106

Mr. Tony Wong  
Air Force Base Conversion Agency/DB Mather  
10503 Armstrong Avenue  
Mather, California 95655-4101

Pete Wilson  
Governor

Peter M. Rooney  
Secretary for  
Environmental  
Protection

Ms. Kathleen Salyer  
United States Environmental Protect Agency  
75 Hawthorne Street (SFD-8-1)  
San Francisco, California 95105-3901

PROJECT MANAGER CHANGE FOR MATHER AIR FORCE BASE

Dear Mr. Wong and Ms. Salyer:

Pursuant to Section 18.2 of the Mather Air Force Base Federal Facility Agreement, as of January 12, 1998, Ms. Linda Hogg has assumed the duties of Remedial Project Manager for the Department of Toxic Substances Control. Ms. Hogg may be reached (916) 255-3771.

If you have any questions regarding to this matter, please contact me at (916) 255-3676.

Sincerely,

Daniel T. Ward, P.E.  
Chief  
Base Closure Unit  
Office of Military Facilities

cc: Mr. James Taylor  
Regional Water Quality Control Board  
3443 Routier Road, Suite A  
Sacramento, California 95827





DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830 93

7 Aug 98

MEMORANDUM FOR DISTRIBUTION

FROM: AFBCA/DA Mather  
10503 Armstrong Avenue  
Mather, CA 95655-4101

SUBJECT: Federal Facility Agreement Appendix D Revision: Proposed Document Schedule for  
Additional Operable Unit

1. The attached 'Appendix D' document schedule is proposed, per Section 8 of the Federal Facility Agreement for Mather Air Force Base, for Mather Operable Unit Number 6 (a more descriptive name has yet to be adopted) consisting of Installation Restoration Program sites 80, 85, 88, and also addressing areas of concern at the old skeet range location and the area of suspected buried ordnance. The schedule assumes that an additional characterization phase will not be necessary at the latter location. If additional investigation is required, then this site may be removed from this operable unit to allow decision documentation for the other sites to proceed expeditiously.

2. Also included on the proposed Appendix D document schedule is a date for the Draft Revised Base Cleanup Plan that will be updated and expanded to incorporate a guide to the operation and maintenance program for all Installation Restoration Program sites at Mather, as described in Section 2.2.10 of the Basewide Operable Unit Record of Decision.

3. Questions should be addressed to Bill Hughes, Waste Policy Institute, at (916) 364-4007.

  
Anthony C. Wong  
BRAC Environmental Coordinator

Attachment: Proposed Appendix D

DISTRIBUTION:

U.S. EPA, Attn: Kathleen Salyer (SFD-8-1)  
CA DTSC, Attn: Linda Hogg

cc:

CA CVRWQCB, Attn: James Taylor  
CA IWMB, Attn: Glenn Young  
Sacramento County, Attn: Tom Truskowski  
RAB Co-chair, Attn: Robert Coughran  
AFBCA/EV, Attn: Frank Duncan  
AFCEE/ERB, Attn: Ralph Rosales  
AFCEE/ERB, Attn: Paul Bernheisel

**Appendix D Revision****Mather AFB**

Proposed 7 August 1998; responses due by close of business 24 August 1998

Document	Draft Document Due Date
Ordnance Disposal Area of Concern Initial Investigation Report	1 December 1998 (report contracted for 30-day review period)
Base Cleanup Plan	31 January 1999
Operable Unit 6 Focused Feasibility Study Report	1 March 1999
Operable Unit 6 Proposed Plan	1 September 1999 (proposed 30-day regulatory review and 30-day document revision to allow public comment period during December 1999)
Record of Decision	31 January 2000



## Mather Air Force Base Installation Restoration Program

## Basewide Operable Unit Record of Decision Consensus Statement, 8/13/98

The remedial project managers have mutually agreed to issue change pages to the Revised Draft Final ROD to correct typographical errors and complete comment resolution for comments on the Draft Final document, deferring the finalization of the ROD until 22 August. The prior consensus statement dictated that the Draft Final ROD would become a final document on 15 August. The remedial project managers have agreed to produce these change pages by 22 August.

This consensus statement is made under Section 9.2 (g) of the FFA, requiring mutual agreement of the FFA parties as to good cause for the extension.

*for* *Randall Wilson*  
Anthony C. Wong, AFBCA/DB-Mather  
8/13/98  
Date

*Kathleen Salyer*  
Kathleen Salyer, U.S. EPA Region IX  
8/13/98  
Date

*A. J. Landis*  
Anthony J. Landis, Cal EPA, DTSC  
8-13-98  
Date



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830 97

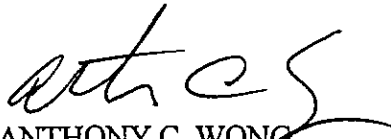
21 Jan 97

MEMORANDUM FOR U.S. EPA, Region IX, Attn: Kathleen Salyer (SFD-8-1)  
DTSC, Attn: Kent Strong

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

SUBJECT: Transmittal of Consensus Statement for FFA Schedule Adjustments, Draft  
Final Basewide Operable Unit Focused Feasibility Study

1. Transmitted by copy of this letter is a completed consensus statement implementing the Schedule adjustments proposed in my letter of 6 January. Please add this to Appendix D of your copy of the Mather Federal Facility Agreement.
2. Questions should be addressed to Bill Hughes at (916) 364-4007.

  
ANTHONY C. WONG  
BRAC Environmental Coordinator

Atch: consensus statement

cc:

RWQCB, Attn: James Taylor  
IWMB, Attn: Tamara Zielinski  
HQ AFBCA/DBM, Attn: Frank Duncan  
HQ AFCEE/ERB, Attn: Maj Debra Watts  
AFCEE/ERB, Attn: Paul Bernheisel  
Sacramento County, Attn: Randall Yim  
URS, Attn: Wellington Yee

## Mather Air Force Base Installation Restoration Program

**Draft Final Basewide Operable Unit Focused Feasibility Study Consensus Statement**


The remedial project managers have mutually agreed to modify the revision schedule for the Draft Final Basewide Operable Unit Focused Feasibility Study as follows. The revisions to the 'Draft' document will undergo one additional comment resolution meeting to incorporate review comments received from the U.S. EPA and the State of California based upon an interim revised draft. The comments will be incorporated into the document and a Draft Final document issued no later than 14 February 1997 subject to the terms of the Federal Facility Agreement for Mather AFB. This consensus statement confirms the agreement of the Remedial Project Managers of the extension for the delivery of the Draft Final Basewide Operable Unit Focused Feasibility Study from 7 January to 14 February 1997.

  
\_\_\_\_\_  
Anthony C. Wong, AFBCA/DB-Mather

1/16/97  
Date

  
\_\_\_\_\_  
Kathleen Salyer, U.S. EPA Region IX

1/16/97  
Date

  
\_\_\_\_\_  
Kent Strong, Cal EPA, DTSC

1/16/97  
Date

## Mather Air Force Base Installation Restoration Program

**Draft Final Basewide Operable Unit Focused Feasibility Study Consensus Statement**


The remedial project managers have mutually agreed to modify the revision schedule for the Draft Final Basewide Operable Unit Focused Feasibility Study as follows. The revisions to the 'Draft' document will undergo one additional comment resolution meeting to incorporate review comments received from the U.S. EPA and the State of California based upon an interim revised draft. The comments will be incorporated into the document and a Draft Final document issued no later than 14 February 1997 subject to the terms of the Federal Facility Agreement for Mather AFB. This consensus statement confirms the agreement of the Remedial Project Managers of the extension for the delivery of the Draft Final Basewide Operable Unit Focused Feasibility Study from 7 January to 14 February 1997.



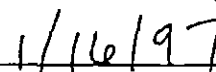
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Anthony C. Wong, AFBCA/DB-Mather

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Date

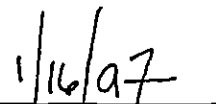
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Kathleen Salyer, U.S. EPA Region IX

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Date

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Kent Strong, Cal EPA, DTSC

---

Date



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830100

6 Jan 97

MEMORANDUM FOR U.S. EPA, Region IX, Attn: Kathleen Salyer (SFD-8-1)  
DTSC, Attn: Kent Strong

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

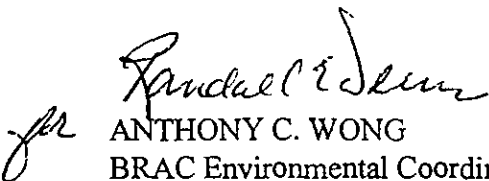
SUBJECT: FFA Schedule Adjustments, Draft Final Mather AFB Off-Base Water Supply Contingency Plan, Draft Final Basewide Operable Unit Focused Feasibility Study, and Draft Basewide Operable Unit Proposed Plan

1. This letter documents two schedule adjustments agreed to by the Remedial Project Managers (RPMs) for the Federal Facility Agreement (FFA) signatory parties, and initiates the formal extensions required by the FFA. These adjustments are for delivery of (1) the Draft Final Mather AFB Off-Base Water Supply Contingency Plan (Contingency Plan) and (2) the Draft Final Basewide Operable Unit Focused Feasibility Study (FFS). In addition, this letter requests an extension for the Draft Basewide Operable Unit Proposed Plan until three weeks after the Draft Final FFS is issued.
2. Currently, by consensus agreement completed by signature on 19 Nov 96, the Draft Final Contingency Plan was to be issued on 13 January 1997. However, in the comment resolution meeting on 18 December, the RPMs agreed that this delivery date would be extended to 31 January to allow review of the associated Draft Final Project Report/Analysis, Alternative Water Supply Feasibility Study (AWSFS), from which the Contingency Plan draws cost data. The AWSFS is due in Draft Final to the Air Force today, 6 January 1997, and will be available to 'stakeholder' parties as soon as it is received by my office. The extension for the delivery of the Draft Final Contingency Plan from 13 January to 31 January 1997, may be considered to be accomplished by the Air Force under Section 7.7 (f) of the FFA by written notice contained in this letter.
3. The Draft Final FFS was to be issued on 7 January 1997. However, during the Base Cleanup Team meeting on 12 December, in which comments on the Draft FFS were reviewed, the RPMs agreed that an additional comment resolution meeting for the FFS would be advisable, and that therefore an extension to 14 February 1997 would be warranted. Because the extension would be 38 days, and needs to be documented prior to the due dates

of 7 January, this letter provides notice of a 30-day extension, from 7 January to 6 February, under Section 7.7 (f) of the FFA. A consensus statement is attached for your review that is proposed for completion during the BCT meetings on 15 & 16 January to approve the final 8 days of the extension from 6 February to 14 February 1997.

4. In association with the extension for the Draft Final FFS, the Air Force requests an extension for the date of the Draft Final Basewide Operable Unit Proposed Plan from 28 January to 7 March 1997. A 21-day review of the Proposed Plan would be requested, with a goal of holding a 30-day public comment period during May, to support the inclusion of the Responsiveness Summary in the Draft Basewide Operable Unit Record of Decision, due July 1, 1997. This request is made under Section 9.2 (g) of the FFA, requiring mutual agreement of the FFA parties as to good cause for the extension.

5. Questions should be addressed to Bill Hughes at (916) 364-4007.

  
ANTHONY C. WONG  
BRAC Environmental Coordinator

Atch: Proposed consensus statement

cc:

RWQCB, Attn: James Taylor  
IWMB, Attn: Tamara Zielinski  
HQ AFBCA/DBM, Attn: Frank Duncan  
HQ AFCEE/ERB, Attn: Maj Debra Watts  
AFCEE/ERB, Attn: Paul Bernheisel  
Sacramento County, Attn: Randall Yim  
URS, Attn: Wellington Yee

## Mather Air Force Base Installation Restoration Program

**Draft Final Basewide Operable Unit Focused Feasibility Study Consensus Statement**

The remedial project managers have mutually agreed to modify the revision schedule for the Draft Final Basewide Operable Unit Focused Feasibility Study as follows. The revisions to the 'Draft' document will undergo one additional comment resolution meeting to incorporate review comments received from the U.S. EPA and the State of California based upon an interim revised draft. The comments will be incorporated into the document and a Draft Final document issued no later than 14 February 1997 subject to the terms of the Federal Facility Agreement for Mather AFB. This consensus statement confirms the agreement of the Remedial Project Managers of the extension for the delivery of the Draft Final Basewide Operable Unit Focused Feasibility Study from 7 January to 14 February 1997.

---

Anthony C. Wong, AFBCA/DB-Mather

---

Date

---

Kathleen Salyer, U.S. EPA Region IX

---

Date

---

Kent Strong, Cal EPA, DTSC

---

Date



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

4 Feb 97

MEMORANDUM FOR U.S. EPA, Region IX, Attn: Kathleen Salyer (SFD-8-1)  
DTSC, Attn: Kent Strong

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

SUBJECT: FFA Schedule Extension Request for the Draft Final Basewide Operable Unit  
Focused Feasibility Study, and Draft Basewide Operable Unit Proposed Plan

1. The Air Force hereby requests an extension for delivery of the Draft Final Basewide Operable Unit Focused Feasibility Study, and Draft Basewide Operable Unit Proposed Plan, in order to incorporate changes agreed upon on 23 and 24 January 1997 by the Remedial Project Managers from the Air Force, U.S. EPA, Regional Water Quality Control Board, and Integrated Waste Management Board (for Site 7). This request is made under Section 9.2 (g) of the FFA, requiring mutual agreement of the FFA parties as to good cause for the extension.

2. This letter documents the additional elements of the Focused Feasibility Study agreed to by the RPMs that will require additional preparation time. These are as follows. Other changes were also requested, that were not judged to require extended time.

Sites 10C and 68 are to be combined; alternatives are to be revised to eliminate excavation of shallow subsurface soils

Alternative 20.4 is to be revised to incorporate collection of soluble TPH data and groundwater monitoring in lieu of remediation of marginal TPH concentrations

Areas of concern from Site 23 investigations will be identified as 23a, 23b, etc., instead of being associated with other IRP sites. Alternative costs will be developed on a per acre basis.

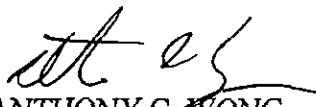
Add Alternative 80.3 (Site 80 = Golf Course Maintenance Area Ditch), excavation with off-base disposal

Add a Site 81 alternative including on-base disposal of excavated sediments and surface soils at Site 7.



Re-evaluate cost estimate for Site 85 based upon review of width of ditch, and probable need to de-water ditch and /or sediments  
Revise Site 86 alternatives  
Revise Site 87 alternatives  
Revise Site 88 (Morrison Creek 'reference area') exposure scenario to reflect recreational exposure and add an alternative to include excavation and off-site disposal.

3. Please provide any response to this request within seven days per FFA Section 9.4; no response will be considered to indicate concurrence with the requested extension. If this extension is agreed upon, the new delivery date for the FFS will be 28 February 1997, and delivery date for the Draft Proposed Plan would be extended until 21 March 1997.
4. Questions should be addressed to Bill Hughes at (916) 364-4007.

  
ANTHONY C. WONG  
BRAC Environmental Coordinator

cc:

RWQCB, Attn: James Taylor  
IWMB, Attn: Tamara Zielinski  
HQ AFBCA/DBM, Attn: Frank Duncan  
HQ AFCEE/ERB, Attn: Maj Debra Watts  
AFCEE/ERB, Attn: Paul Bernheisel  
Sacramento County, Attn: Randall Yim  
URS, Attn: Wellington Yee

1830105



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

Anthony Wong  
BRAC Environmental Coordinator  
Air Force Base Conversion Agency  
10503 Armstrong Way  
Mather, CA 95655

February 24, 1996

Dear Mr. Wong,

EPA requires a seven day extension of the 60 day comment period for the *Draft Remedial Action Work Plan for Phase I Groundwater Remediation for Site 7 Operable Unit at Mather AFB, December 1996* and the *Draft Remedial Action Work Plan for Phase I Groundwater Remediation for Main Base/Strategic Air Command Industrial Area Operable Units at Mather AFB, December, 1996*. I will submit comments to you by February 28, 1997. If you have any questions please contact me at (415) 744-2214.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Salyer". The signature is written in a cursive style.

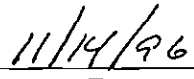
Kathleen Salyer  
Remedial Project Manager

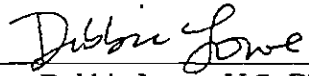
Mather Air Force Base Installation Restoration Program

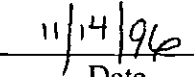
Off-Base Water Supply Contingency Plan Consensus Statement

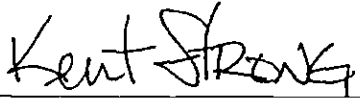
The remedial project managers have mutually agreed to modify the revision schedule for the Draft Mather AFB Off-Base Water Supply Contingency Plan as follows. The 'Draft' document will be revised to incorporate review comments received from the U.S. EPA, the State of California, the affected water purveyors, and the Restoration Advisory Board, and issued as a 'Revised Draft' rather than a 'Draft Final' document on 25 November 1996. The Revised Draft will be subject to review, with written comments due on 13 December 1996. The comments will be incorporated into the document and a Draft Final document issued no later than 13 January 1997 subject to the terms of the Federal Facility Agreement for Mather AFB.

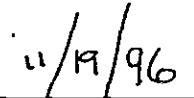
  
\_\_\_\_\_  
Anthony C. Wong, AFBCA/DB-Mather

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Debbie Lowe, U.S. EPA Region IX

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Kent Strong, Cal EPA, DTSC

  
\_\_\_\_\_  
Date



October 22, 1996

Cal/EPA

Department of  
Toxic Substances  
Control

Pete Wilson  
Governor

10151 Croydon Way  
Suite 3  
Sacramento, CA  
95827-2106

Mr. Tony Wong  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Armstrong Avenue  
Mather, California 95655-1101

James M. Sirock  
Secretary for  
Environmental  
Protection

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street, H-9-1  
San Francisco, California 94105-3901

DRAFT BASEWIDE OPERABLE UNIT FOCUSED FEASIBILITY STUDY  
REPORT, MATHRR

Dear Mr. Wong & Ms Lowe:

The State of California requests a 17 day extension for the review and comment on the subject document. Comments are due October 22, 1996. The State will provide comments on the document on or before November 8, 1996.

If you have any questions, please call me at (916) 255-3705.

Sincerely,

Kent Strong  
Remedial Project Manager  
Office of Military Facilities





DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1 Oct 96

MEMORANDUM FOR U.S. EPA, Region IX, Attn: Debbie Lowe (H-9-1)  
DTSC, Attn: Kent Strong


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

SUBJECT: Request for FFA Schedule Adjustments, Final CBRA and Draft Proposed Plan

1. The Air Force hereby requests your concurrence on FFA schedule adjustments for two documents. The requested changes and justification are presented separately below.
2. A delay of 30 days in the finalization of the Draft Final Comprehensive Baseline Risk Assessment is requested in order to resolve outstanding Air Force comments on the document. These comments request clarifying text that would not affect the conclusions in the CBRA, but were requested in order that the methods used in the risk assessment be clearly presented for future readers. The revised text would be issued on or by 18 October and an additional 15 days would be allowed for review prior to the document being considered formally final. This will allow one set of change pages to be distributed to revise the Draft Final CBRA in order that it become the Final CBRA. The change pages would be transmitted for receipt on or by 18 October 1996.
3. A change in the FFA schedule for the Draft Basewide Operable Unit Proposed Plan is requested from the current Appendix D due date of 2 December 1996 to a revised due date of 28 January 1997. This will allow the Basewide Operable Unit Focused Feasibility Study to become final (anticipated 22 January 1997) prior to issuance of the Proposed Plan. It is anticipated that a 30-day review of the Draft Proposed Plan and a 30-day revision period can be accomplished, allowing a public comment period during May, and allowing a responsiveness summary to be included in the Draft Record of Decision due to be issued on 1 July 1997.

4. Verbal concurrence on the delay of finalization for the CBRA (paragraph 2 above) has been received. If no contrary response is received within 7 days, these requests will be considered to meet with your concurrence.

5. Questions should be addressed to Bill Hughes at (916) 364-4007.



ANTHONY C. WONG  
BRAC Environmental Coordinator

cc:

RWQCB, Attn: James Taylor  
IWMB, Attn: Tamara Zielinski  
HQ AFBCA/EV, Attn: Maj Tim Caretti  
HQ AFCEE/ERB, Attn: Maj Debra Watts  
AFCEE/ERB, Attn: Paul Bernheisel  
Sacramento County, Attn: Randall Yim  
URS, Attn: Wellington Yee



August 23, 1996

Cal/EPA

Department of  
Toxic Substances  
Control

10151 Croydon Way  
Suite 3  
Sacramento, CA  
95827-2106

Mr. Tony Wong  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Armstrong  
Mather, California 95655-1101

Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street, H-9-1  
San Francisco, California 94105-3901

DRAFT MATHER AIR FORCE BASE OFF-BASE WATER SUPPLY  
CONTINGENCY PLAN, MATHER

Dear Mr. Wong & Ms Lowe:

The State of California requests a 30 day extension for the review and comment on the subject document. Comments are due August 26, 1996. The State will provide comments on the document on or before September 25, 1996.

If you have any questions, please call me at (916) 255-3705.

Sincerely,

Kent Strong  
Remedial Project Manager  
Office of Military Facilities





DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830111

July 25, 1996

MEMORANDUM FOR U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX  
ATTENTION: Debbie Lowe (H-9-1)  
CALIFORNIA DEPT. OF TOXIC SUBSTANCES CONTROL  
ATTENTION: Kent Strong

FROM: AFBCA/OL,D  
10503 Kaydet Ave  
Mather, CA 95655-1101

SUBJECT: Mather AFB FFA Appendix D Document Deliverable Dates for RD/RA


1. This letter transmits proposed Federal Facility Agreement (FFA) deliverable dates for draft primary documents for Remedial Design/ Remedial Action for the Groundwater OU Plumes and the Soil OU Sites, as required by Section 8.3 of the FFA. Please provide any comments regarding the proposed deadlines within 15 days.
2. Soil OU sites 19, 29/B, 32, 34, 35, and 36 are considered 'petroleum-only' sites, and are therefore not subject to the CERCLA requirement to begin continuous construction within 15 months of signature of the Record of Decision. However, dates are proposed for remedial action work plans for these sites (remediation is complete at Site 32 and underway at Site 29 under authority of a Removal Action Memorandum).
3. In order to meet the 15-month constraint for the Soil OU CERCLA sites, requiring continuous construction to begin by 27 September 1997, the design review process is envisioned to occur via a single FFA review cycle, augmented with concept/strategy and progress meetings to maintain feedback throughout design development. A briefing of concepts will occur prior to issuance of the Draft Technical Project Plan. The concept of an "on-board" review for this stage will be proposed to facilitate communication during comment development. Comment resolution of this conceptual design will result in development of the Draft Final Technical Project Plan, complete with construction drawings. Intermediate meetings will occur as necessary to ensure adequate regulatory participation in the design process.



4. Sites 56, 59, 60, 62, and 65 will be remediated under the Technical Plans issued in draft in -- -- --  
December 1995.

5. In order to begin construction for the Groundwater OU remedial actions within the 15-  
months allotted, construction will begin before completion of the full set of construction  
drawings, on activities briefed beforehand to the FFA Parties.

6. Questions on the proposed schedule should be addressed to Bill Hughes at (916) 364-4007.

  
for: ANTHONY C. WONG  
BRAC Environmental Coordinator

Atch: Proposed Appendix D Additions

cc: AFCEE/ERB, Attn: Maj Watts  
AFCEE/ERB-Mather, Attn: P. Bernheisel  
HQ AFBCA/NW, Attn: Maj Caretti  
URS, (1 copy) Attn: W. Yee  
RWQCB (1 copy), Attn: J. Taylor  
IWMB (1 copy), Attn: T. Zielinski  
Sacramento County, Attn: R. Yim  
OpTech c/o AFBCA/OL,D, Attn: W. Hughes

**MATHER AFB FEDERAL FACILITY AGREEMENT****Proposed APPENDIX D Additions      JULY 25, 1996**

<b>Document</b>	<b>Draft Due Date</b>
Groundwater OU RAWP	Nov 30, 1996
GW OU Preliminary Engineering Report	Apr 29, 1997
GW OU Construction Drawings	Nov 10, 1996
GW OU Operation and Maintenance Plan	Apr 9, 1998
Site 7/11 Technical Project Plan	Apr 1, 1997
Site 7/11 Operation and Maintenance Plan	Nov 1, 1997
Site 37/39/54 Technical Project Plan	Apr 15, 1997
Site 37/39/54 Operation and Maintenance Plan	Nov 15, 1997
Sites 13 and 15 Technical Project Plan	Apr 1, 1997
Site 57 Technical Project Plan	Oct 7, 1996
Site 57 Operation and Maintenance Plan	May 21, 1997
Site 69 Technical Project Plan	May 1, 1997
<b>Non-CERCLA sites:</b>	
Site 19 Technical Project Plan	Oct 28, 1996
Site 19 Operation and Maintenance Plan	May 21, 1997
Site 20 UST site will be excavated under RWQCB oversight mid-September, 1996	
Sites 34, 35, 36 Technical Project Plan	May 21, 1997
Site 34, 35, 36 Operation and Maintenance Plan	Nov 30, 1997



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830114

July 1, 1996

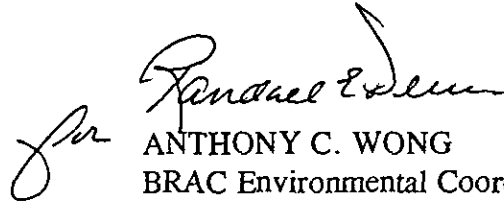
MEMORANDUM FOR U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX  
ATTENTION: Debbie Lowe (H-9-1)  
CALIFORNIA DEPT. OF TOXIC SUBSTANCES CONTROL  
ATTENTION: Kent Strong

FROM: AFBCA/OL,D  
10503 Kaydet Ave  
Mather, CA 95655-1101

SUBJECT: Mather AFB Federal Facility Agreement Appendix D Document Deliverable Dates

1. This letter transmits a schedule of the current Federal Facility Agreement (FFA) deliverable dates for draft primary documents and also requests an extension for delivery of the Draft Basewide Operable Unit Draft Focused Feasibility Study. The schedule of document due dates is transmitted to be incorporated in Appendix D of the Mather FFA. Dates for additional documents for remedial design/ remedial action for the Soil OU and Groundwater OU are not included herein, and will be proposed in a separate letter.
2. The Air Force hereby requests an extension for the delivery of the Draft Basewide Operable Unit Draft Focused Feasibility Study, from the current due date of 19 July, to 23 August 1996. This extension is requested under Section 9.2(g) of the FFA, requiring mutual concurrence of the Parties to the agreement. The good cause for the extension request is to allow time to perform vadose-zone contaminant transport modeling for the ASC sites with VOCs detected in soil or soil gas samples, following the general strategy agreed upon in the Soils OU ROD. Initially this request caused a projected cost over-run for the contractor, who could not proceed with this as well as other unanticipated work, until authorized to do so. The contractor has been directed to proceed, and has estimated a five-week delay from the current delivery date, all related to the vadose-zone modeling.
3. Please confirm your concurrence in writing within seven days, per FFA Section 9.4. If no response is received, concurrence will be assumed.

4. Questions should be addressed to Bill Hughes at (916) 364-4007.

  
ANTHONY C. WONG  
BRAC Environmental Coordinator

Atch: Appendix D insert

cc: AFCEE/ERB, Attn: Maj Watts  
AFCEE/ERB-Mather, Attn: P. Bernheisel  
HQ AFBCA/NW, Attn: Maj Caretti  
URS, (1 copy) Attn: W. Yee  
RWQCB (1 copy), Attn: J. Taylor  
IWMB (1 copy), Attn: T. Zielinski  
Sacramento County, Attn: R. Yim  
OpTech c/o AFBCA/OL,D, Attn: W. Hughes

**MATHER AFB FEDERAL FACILITY AGREEMENT****APPENDIX D UPDATE      JULY 1, 1996**

<b>Document</b>	<b>Draft Due Date</b>
Groundwater Supply Contingency Plan	6/27/96
Final OU Focused Feasibility Study	7/19/96 (proposed extension to 8/23/96)
AC&W Explanation of Significant Difference	7/31/96
Groundwater Monitoring Program Evaluation Report	10/1/96
Basewide OU Proposed Plan	12/2/96
1996 AC&W Annual Report	1/31/97
1996 Annual Groundwater Monitoring Report	3/15/97
Basewide OU ROD	7/1/97

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 1  
10151 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2106



25) 255-3545

June 28, 1996

Mr. Tony Wong  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue, Building 2527  
Mather, California 95655

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street, H-9-1  
San Francisco, California 94105-3901

REVISED DRAFT COMPREHENSIVE BASELINE RISK ASSESSMENT FOR  
MATHER AIR FORCE BASE, CALIFORNIA

Dear Mr. Wong & Ms. Lowe:

Pursuant to Section 7.7(b) of the Federal Facilities Agreement, the State of California (State) requests an extension for the review and comment on the subject document. Comments were due July 1, 1996. The State will provide comments on the document on or before July 5, 1996.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in cursive script that reads "Daniel T. Ward".

for

Kent Strong  
Remedial Project Manager

cc: Mr. Bill Hughes  
Operational Technologies Corporation  
10503 Kaydet Avenue, Building 2527  
Mather, California, 95655

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL



1  
1 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2106

(916) 255-3435

May 31, 1996

Mr. Tony Wong  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue, Building 2527  
Mather, California 95655

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street, H-9-1  
San Francisco, California 94105-3901

DRAFT ADDITIONAL SITE CHARACTERIZATION AND FINAL BASEWIDE OPERABLE UNIT  
REMEDIAL INVESTIGATION REPORT, MATHER

Dear Mr. Wong & Ms. Lowe:

Pursuant to Section 7.7(b) of the Federal Facilities Agreement, the State of California (State) requests an additional extension of one week for the review and comment on the subject document. Comments were due May 31, 1996. The State will provide comments on the document on or before June 7, 1996.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong". The signature is written in a cursive, somewhat stylized font.

Kent Strong  
Remedial Project Manager

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

11  
1 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2108



(916) 255-3435

May 24, 1996

Mr. Tony Wong  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue, Building 2527  
Mather, California 95655

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street, H-9-1  
San Francisco, California 94105-3901

DRAFT ADDITIONAL SITE CHARACTERIZATION AND FINAL BASEWIDE OPERABLE UNIT  
REMEDIAL INVESTIGATION REPORT, MATHER

Dear Mr. Wong & Ms. Lowe:

The State of California (State) requests a one week extension for the review and comment on the subject document. Comments are due May 24, 1996. The State will provide comments on the document on or before May 31, 1996.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong". The signature is written in a cursive, somewhat stylized font.  
Kent Strong  
Remedial Project Manager





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

Anthony Wong  
BRAC Environmental Coordinator  
Air Force Base Conversion Agency  
10503 Kaydet Ave.  
Mather, CA 95655

May 3, 1996

Dear Mr. Wong,

Pursuant to Section 7.7 (b) of the Federal Facilities Agreement, EPA requests a five day extension for review and comment on the Additional Site Characterization RI Report. Comments will be provided to you on or before May 24, 1996.

This extension may affect the schedule for the Final OU Feasibility Study, Proposed Plan, and Record of Decision.

Sincerely,

A handwritten signature in cursive script, appearing to read "Debbie Lowe".

Debbie Lowe  
Remedial Project Manager

cc: Kent Strong, DTSC

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 1

10151 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2106

(916) 255-3705



February 26, 1996

Mr. Tony Wong  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue, Building 2527  
Mather, California 95655

DRAFT FOURTH QUARTERLY 1995 REPORT FOR AIRCRAFT CONTROL AND  
WARNING PUMP AND TREAT SYSTEM, MATHER

Dear Mr. Wong:

Pursuant to Section 7.7(b) of the Mather Federal Facilities Agreement, the State is requesting a two week extension for review of the subject document. Comments will be delivered on or before March 12, 1996.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager  
Office of Military Facilities

cc: Mr. Bill Hughes  
Operational Technologies Corporation  
10503 Kaydet Avenue, Building 2527  
Mather, California 95655

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street, H-9-1  
San Francisco, California 94105





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

Anthony Wong  
BRAC Environmental Coordinator  
Air Force Base Conversion Agency  
10503 Kaydet Ave.  
Mather, CA 95655

February 20, 1996

Dear Mr. Wong,

Pursuant to Section 7.7 (b) of the FFA, EPA is requesting a two week extension for agency review of the Draft Landfill Closure Plan. Although EPA will not be providing comments on this document, this additional time is requested so that U.S. Fish and Wildlife will have adequate time to review and provide comments on the Closure Plan. Please note that the document was provided to U.S. Fish and Wildlife during the time when their offices were closed during the federal government shutdown. U.S. Fish and Wildlife will provide their comments to you on or before March 5, 1995.

In addition, EPA requests an additional seven days to review the Report of Analytical Results, Site 20 and an additional three days to review the Draft Technical Plans and Quality Program Plan for Removal Actions for Soil Operable Unit Sites 56, 59, 60, 62, and 65. EPA comments on both of these documents will be provided on or before February 23, 1996.

If you have any questions, please feel free to contact me at (415) 744-2206.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Lowe".

Debbie Lowe  
Remedial Project Manager

cc: Kent Strong, D'ISC  
Bill Hughes, OpTech  
Brian Hovander, AFBCA  
Lori Rinek, F&W  
James Taylor, RWQCB

## MATHER AIR FORCE BASE CONSENSUS STATEMENT


February 28, 1996

DRAFT FINAL SOIL OPERABLE UNIT AND GROUNDWATER OPERABLE UNIT PLUMES, MATHER AIR FORCE BASE

The February 16, 1996 Revised Draft Final Soil and Groundwater Operable Unit Record of Decision (ROD) is currently scheduled to become Final on March 5, 1996.

The State has identified seventeen issues (see attached Issues Summary, February 9, 1996) that need resolution, based on the January 18, 1996 Draft Final version of the ROD. The Remedial Project Managers (RPMs) believe that the informal dispute process has been exhausted for three of the issues (Major Issue #1: Vadose Zone Cleanup Standard/SVE Shut-off Criteria, related Major Issue #5: SVE trigger, and Major Issue #2: Citizens Utilities). In order to facilitate timely resolution of this dispute, the State RPMs will recommend to their management initiation of formal dispute on these three items on or before March 5, 1996. If the State does not intend to invoke dispute on these three issues by March 5, 1996, then the State must obtain written concurrence for any further extensions on these three issues from the other Federal Facilities Agreement (FFA) parties (RPMs or immediate supervisor).

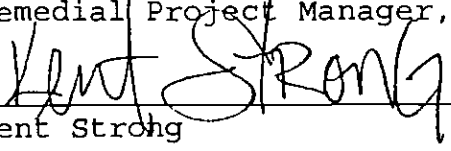
The RPMs believe that the remainder of the issues in the Issues Summary can be resolved through informal dispute. By consensus of the RPMs, the ROD schedule will be extended by thirty (30) days in order to allow the Federal Facilities Agreement (FFA) parties to meet as many times as necessary in order to resolve these issues. The document is now scheduled to become Final on April 4, 1996. If these issues are not resolved by April 4, 1996, the RPMs will either agree by consensus to another extension or the State may initiate formal dispute on these additional issues.

  
 \_\_\_\_\_  
 Anthony C. Wong  
 BRAC Environmental Coordinator, AFBCA

2/28/96  
 Date

  
 \_\_\_\_\_  
 Debbie Lowe  
 Remedial Project Manager, U.S. EPA

2/28/96  
 Date

  
 \_\_\_\_\_  
 Kent Strong  
 Remedial Project Manager, DTSC

2/28/96  
 Date

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1830124



REGION 1

10151 CROYDON WAY, SUITE 3

SACRAMENTO, CA 95827-2106

(916) 255-3705

February 26, 1996

Mr. Tony Wong  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue, Building 2527  
Mather, California 95655

DRAFT FOURTH QUARTERLY 1995 REPORT FOR AIRCRAFT CONTROL AND  
WARNING PUMP AND TREAT SYSTEM, MATHER

Dear Mr. Wong:

Pursuant to Section 7.7(b) of the Mather Federal Facilities Agreement, the State is requesting a two week extension for review of the subject document. Comments will be delivered on or before March 12, 1996.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager  
Office of Military Facilities

cc: Mr. Bill Hughes  
Operational Technologies Corporation  
10503 Kaydet Avenue, Building 2527  
Mather, California 95655

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street, H-9-1  
San Francisco, California 94105



1830125

Mr. Tony Wong  
February 26, 1996  
Page Two

cc: Mr. James Taylor  
Regional Water Quality Control Board  
Central Valley Region  
3443 Routier Road  
Sacramento, California 95827-3098

1830126

DEPARTMENT OF  
TOXIC SUBSTANCES CONTROL  
10151 CROYDON WAY, SUITE 3  
SACRAMENTO, CALIFORNIA 95827-2106  
(916) 255-3545



TELECOPIER MESSAGE

TO: Henry Wong, Vernon Lowy, Bill Hughes,  
James Taylor, John Scott  
FROM: Kent Strong

SPECIAL INSTRUCTIONS:

NUMBER OF PAGES INCLUDING COVER SHEET: 3

1830127

STATE OF CALIFORNIA—CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 1

10151 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2106

(916) 255-3545



February 20, 1996

Mr. Tony Wong  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street (H-9-1)  
San Francisco, California 94105-3901

DRAFT FINAL SOILS OPERABLE UNIT AND GROUNDWATER OPERABLE UNIT  
RECORD OF DECISION EXTENSION

Dear Mr. Wong & Ms. Lowe:

The Department of Toxic Substances Control requests an extension to the finalization of the subject document so that currently unresolved issues may receive additional consideration. If the extension is not granted, a number of issues resolvable by the Remedial Project Managers may become dispute items. A two week extension is requested. The document's finalization date would become March 5, 1996. This extension is made under Section 9.2(g) of the Federal Facilities Agreement (FFA) for Mather Air Force Base. Section 9.2(g) requires the mutual agreement by the FFA parties.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager  
Office of Military Facilities

cc: See next page.





1830128

Mr. Tony Wong  
Ms. Debbie Lowe  
February 20, 1996  
Page Two

cc: Mr. Bill Hughes  
Operational Technologies Corporation  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

Mr. James Taylor  
Regional Water Quality Control Board  
Central Valley Region  
3443 Routier Road  
Sacramento, California 95827-3098

DEPARTMENT OF  
JACKSONVILLE, CALIFORNIA 95212-2100  
(916) 255-3545

1830129



TELECOPIER MESSAGE

DATE: Feb 20, 1996

PLEASE DELIVER ASAP

TO: Tony Wong, Debbie Lowe, James Taylor  
Rod Whitten, Bill Hughes

FROM: Kent Strong

SPECIAL INSTRUCTIONS:

Please consider the ROD request for extension.

NUMBER OF PAGES INCLUDING COVER SHEET: 3



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830130

20 Feb 96

MEMORANDUM FOR U.S. EPA, Attn: Debbie Lowe (H-9-1)  
CA DTSC, Attn: Kent Strong

FROM: AFBCA/OL,D  
10503 Kaydet Avenue  
Mather, CA 95655-1101

SUBJECT: Approval of Requested Extension for Finalization of  
Record of Decision for Soils OU Sites and Groundwater  
OU Plumes

1. In response to DTSC's letter dated today, the requested extension of two weeks is approved by the Air Force with the provision that the extended time period be considered a period of informal dispute resolution with respect to the concerns raised in the 09 Feb 96 document ("Mather Draft Final Soil and Groundwater OU Plumes ROD RWQCB Issues Summary") and in the IWMB letter of 09 Feb 96 ("Review of the...(ROD) for the Mather...dated January 18, 1996). This will ensure that senior staff assist in the commitment to resolve issues. Therefore, in order to make progress toward resolving issues during the two-week extension, it is requested that the State and U.S. EPA provide as soon as possible, a list of personnel who will participate in issue resolution (some personnel may be 'assigned' to some but not all issues) and available half-days they can support meetings or teleconferences during the two-week period.

2. The requested extension is judged to fall under Section 9.2.(g) of the Federal Facility Agreement (FFA), requiring mutual agreement of the parties. Debbie Lowe, Remedial Project Manager for the U.S EPA, plans to provide her written response today.

3. Pending approval of the extension by U.S. EPA, the revised finalization date for the subject document will become 5 Mar 96. It should be noted that the Mather RPMS will be traveling to

1830131

attend the Air Force technical peer review of the Mather FY97 and FY98 programs from the 4th to the 6th of March.

4. Questions may be addressed to Bill Hughes at (916) 364-4007.



ANTHONY C. WONG

BRAC Environmental Coordinator

cc:

CA RWQCB, Attn: James Taylor

CA IWMB, Attn: Tamara Zielinski

HQ AFBCA/EV, Attn: Maj Tim Caretti

HQ AFBCA/LD, Attn: Brent Evans

AFCEE/ERB, Attn: Maj Debra Watts



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

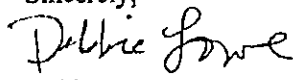
Kent Strong  
Remedial Project Manager  
DTSC, Region 1  
10501 Croydon Way  
Sacramento, CA

February 20, 1996

Dear Mr. Strong,

In response to your letter dated today, EPA approves the requested two week extension on the Draft Final Soil and Groundwater Operable Unit Record of Decision (ROD) with two conditions: (1) that these two weeks be considered a period of informal dispute under Section 12.3 of the FFA; and (2) that clarification be provided on the issues which will be discussed during the two week extension request. EPA has reviewed the Mather Draft Final Soil OU and Groundwater OU Plumes ROD RWQCB Issues Summary, 9 February 1996 and the IWMB letter of 9 Feb 1996. Is the purpose of the two week extension to resolve the potential dispute issues while delaying the "dispute issues" till formal dispute? EPA understands that some of the potential dispute items have already been resolved. A revised list of the issues to be discussed during this informal dispute process should be provided to the other FFA parties as soon as possible in order to ensure that the informal dispute process is productive.

If you have any questions, please contact me at (415) 744-2206.

Sincerely,  
  
Debbie Lowe  
Remedial Project Manager

cc: Anthony Wong, AFBCA

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

ROYDON WAY, SUITE 3  
MUNICIPAL CENTER  
SANTO ANTONIO, CA 95827-2106  
(916) 255-3545



February 20, 1996

Mr. Tony Wong  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street (H-9-1)  
San Francisco, California 94105-3901

DRAFT FINAL SOILS OPERABLE UNIT AND GROUNDWATER OPERABLE UNIT  
RECORD OF DECISION EXTENSION

Dear Mr. Wong & Ms. Lowe:

The Department of Toxic Substances Control requests an extension to the finalization of the subject document so that currently unresolved issues may receive additional consideration. If the extension is not granted, a number of issues resolvable by the Remedial Project Managers may become dispute items. A two week extension is requested. The document's finalization date would become March 5, 1996. This extension is made under Section 9.2(g) of the Federal Facilities Agreement (FFA) for Mather Air Force Base. Section 9.2(g) requires the mutual agreement by the FFA parties.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager  
Office of Military Facilities

cc: See next page.



Mr. Tony Wong  
Ms. Debbie Lowe  
February 20, 1996  
Page Two

cc: Mr. Bill Hughes  
Operational Technologies Corporation  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

Mr. James Taylor  
Regional Water Quality Control Board  
Central Valley Region  
3443 Routier Road  
Sacramento, California 95827-3098

## MATHER AFB IRP DOCUMENT STATUS

## Current Schedule for Document Delivery and Review

<b>Document</b>	<b>Draft</b>	<b>Comments Due</b>	<b>Draft Final</b>	<b>Final</b>
Additional Site Characterization Work Plan				10/18/95
Mather Baseline Risk Assessment			12/19/95	(1/18/96)
Soils and Groundwater ROD			<b>1/18/96</b>	<b>2/19/96</b>
Community Relations Plan (update)	8/29/95	10/30/95	12/29/95	1/29/96
Additional Site Characterization Work Plan Addendum	9/25/95	11/24/95	1/25/96	2/26/96
1995 Groundwater Monitoring Program Evaluation report (GWMPER)	10/13/95	12/12/95*	2/12/96	(3/13/96)
<b>AC&amp;W H&amp;S Plan Addendum</b>	<b>10/13/95</b>	<b>12/12/95*</b>	<b>2/12/96</b>	<b>(3/13/96)</b>
<b>AC&amp;W S&amp;A Plan Addendum</b>	<b>10/13/95</b>	<b>12/12/95*</b>	<b>2/12/96</b>	<b>(3/13/96)</b>
<b>Addendum to Sampling &amp; Analysis Plan, Groundwater Monitoring Program</b>	11/20/95	1/22/96*	3/22/96	(4/22/96)
Landfill Preliminary Definition Report	12/8/95	2/6/96	4/8/96	5/8/96
Landfill Closure Plan	12/22/95	2/20/96	4/22/96	5/22/96
Additional Site Characterization Report	3/19/96	5/20/96	7/19/96	8/19/96
Comprehensive Baseline Risk Assessment	5/1/96**	7/1/96	9/3/96	10/3/96
Final OU Focused Feasibility Study	7/1/96	9/3/96	11/4/96	12/4/96
Final OU Proposed Plan	12/2/96	1/31/97	3/3/97	4/2/97
Final OU ROD	7/1/97	9/2/97	11/3/97	12/3/97

\* Early comments, or early identification of major concerns, are requested in order to complete planning for groundwater sampling to begin in January 1996. \*\*Revised Draft CBRA



NON-CERCLA Documents:

RCRA Closure Report	11/3/95	(non-IRP document; has relevance to IRP Site 39)
Pipeline Removal Report	12/3/95	(non-IRP document; has relevance to IRP sites 29/B, 35, 36, 37, & 39)

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 1

10151 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2106

(916) 255-3705

December 27, 1995

Dr. Charles H. Smith, P.E.  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

DRAFT FINAL SOILS OPERABLE UNIT AND GROUNDWATER OPERABLE UNIT  
RECORD OF DECISION REQUEST FOR DELIVERY EXTENSION

Dear Dr. Smith:

On December 18, 1995, the State of California (State) received the Air Force's request for the due date extension of the subject document. The proposed extension of 30 days is made under Section 9.2(g) of the Federal Facilities Agreement for Mather Air Force Base. The State concurs with the Air Force request.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager  
Office of Military Facilities

cc: Mr. Bill Hughes  
Operational Technologies Corporation  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655



Dr. Charles H. Smith, P.E.  
December 27, 1995  
Page Two

cc: Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street (H-9-1)  
San Francisco, California 94105

Mr. James Taylor  
Regional Water Quality Control Board  
Central Valley Region  
3443 Routier Road  
Sacramento, California 95827-3098



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830139

18 Dec 95

MEMORANDUM FOR U.S. EPA

Attn: Debbie Lowe (H-9-1)  
CA DTSC  
Attn: Kent Strong

FROM: AFBCA/OL,D  
10503 Kaydet Avenue  
Mather, CA 95655-1101

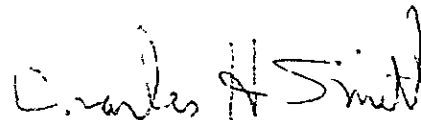
SUBJECT: Request for Document Extension for Record of Decision  
for Soil Operable Unit Sites and Groundwater Operable Unit Plumes

1. The Air Force is poised to release the subject ROD in Draft Final by 19 December, the current FFA delivery date. However, based upon consideration of the position of the U.S. EPA in its dispute of the ROD for the Sharpe Army Depot, it appears that (a) there is a need for further discussion to clarify what the U.S. EPA requires in a ROD independent of groundwater cleanup standards, to ensure that any residual risk presented by contaminants in the vadose zone, and (b) the VOC issue in dispute for the Sharpe ROD is very similar to the issue unresolved for the Mather ROD, and resolution of this issue at Sharpe is likely to have significant bearing on resolution of the issue at Mather. Therefore, the Air Force is requesting a 30-day extension to pursue discussions with the FFA parties, and to consider any resolution, conceptual or applied, that is developed for the Sharpe ROD during this time.

2. This request is made under Section 9.2(g) of the Federal Facilities Agreement for Mather AFB, and thereby requires mutual agreement of the parties, or a failure to respond within 7 days of this request. The length of the requested extension is the nominal maximum increment generally pursued, and is based in part upon the Sharpe dispute time schedule, and in part upon the recognition that progress is slowed during the holiday season when key individuals are on leave.

3. A further consideration, although not sufficient cause for delay in and of itself, is that the Air Force contract for ROD production includes no provisions for document revision after the Draft Final version is issued. It is hoped that this extension will allow the Mather ROD to benefit from the Sharpe dispute and incorporate any relevant concepts deemed mutually acceptable into the ROD, thereby minimizing revisions to the Draft Final document that would likely be required as the result of disputed issues in the Mather ROD.

4. Your prompt response is appreciated. If you have any questions, please call me at (916) 364-4000 or Bill Hughes (OpTech) at (916) 364-4007.



CHARLES H. SMITH, PhD, P.E.  
BRAC Environmental Coordinator

cc:

HQ AFBCA/LD, Attn: Brent Evans  
HQ AFBCA/NW, Attn: Maj Coretti  
AFCEE/ERB, Attn: Maj Watts  
RWQCB, Attn: James Taylor  
IWMB, Attn: Tamara Zielinski



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830141

13 Dec 95

MEMORANDUM FOR U.S. EPA

Attn: Debbie Lowe (H-9-1)

CA DTSC

Attn: Kent Strong

FROM: AFBCA/OL,D

10503 Kaydet Avenue

Mather, CA 95655-1101

SUBJECT: Request for Extension for Community Relations Plan

1. The Draft Community Relations Plan was issued for review on 29 August 1995; comments were due by the FFA parties by 30 October. However, there have been comments provided and concerns raised about the format and content of the CRP during document revision. The latest EPA comments were received today. The Draft Final requires a 10-day Air Force review prior to release, and additional revisions may be required by this review. Therefore, incorporation of the comments received since 30 October will not be possible without an extension. Therefore, in accordance with Section 7.7(f) of the Federal Facility Agreement for Mather AFB, the Air Force hereby extends the delivery date for the revised Draft Final Community Relations Plan by 30 days, from 29 December to 28 January 96.

2. If you have any questions, please call me at (916) 364-4000 or Bill Hughes (OpTech) at (916) 364-4007.

*Charles H. Smith*

CHARLES H. SMITH, PhD, P.E.

BRAC Environmental Coordinator

cc:

HQ AFBCA/EX, Attn: Shirley Curry

HQ AFBCA/NW, Attn: Maj Coretti

AFCEE/ERB, Attn: Maj Watts

AFCEE/ERB-Mather: Attn: Paul Bernheisel

RWQCB, Attn: James Taylor

IWMB, Attn: Tamara Zielinski

Gutierrez-Palmenberg, Inc, Attn: Sandra Lunceford

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 1

10151 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2106

(916) 255-3705

December 7, 1995

Dr. Charles H. Smith, P.E.  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street (H-9-1)  
San Francisco, California 94105-3901

DRAFT FINAL SOILS OPERABLE UNIT AND GROUNDWATER OPERABLE UNIT  
RECORD OF DECISION REQUEST FOR DELIVERY EXTENSION, MATHER

Dear Dr. Smith and Ms. Lowe:

In response to your letters of November 21, 1995 and November 22, 1995 the State of California will not pursue the additional 15 day extension for delivery of the subject Record of Decision (ROD) at this time. Given the current 35 day extension, we fully expect that the United States Air Force will provide resolution of all outstanding issues in the Draft Final ROD, with the possible exception of the Volatile Organic Compound (VOC) cleanup issues. Resolution of the dispute at Defense Distribution Region West, Sharpe concerning VOCs may have an effect on the schedule for finalization of the Mather ROD.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager  
Office of Military Facilities

cc: See next page.





Dr. Charles H. Smith P.E.  
Ms. Debbie Lowe  
December 7, 1995  
Page Two

cc: Mr. Bill Hughes  
Operational Technologies Corporation  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

Mr. James Taylor  
Regional Water Quality Control Board  
Central Valley Region  
3443 Routier Road  
Sacramento, California 95827-3098



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

Dr. Charles H. Smith, PE  
BRAC Environmental Coordinator  
Air Force Base Conversion Agency  
10503 Kaydet Ave.  
Mather, CA 95655

December 1, 1995

Dear Dr. Smith,

On November 22, 1995 EPA requested a one week extension for review and comment on the Additional Site Characterization Work Plan Addendum pursuant to Section 7.7 (b) of the Federal Facilities Agreement (FFA). Under Section 7.7 (b) of the FFA, EPA is requesting an additional one week extension for review and comment on this document. EPA will provide comments on or before December 8, 1995.

If you have any questions, please feel free to contact me at (415) 744-2206.

Sincerely,  
*Debbie Lowe*  
Debbie Lowe  
Remedial Project Manager

cc. Kent Strong, DTSC  
James Taylor, RWQCB

MATHER AFB IRP DOCUMENT STATUS

Current Schedule for Document Delivery and Review

Document	Draft	Comments Due	Draft Final	Final
Additional Site Characterization Work Plan				10/18/95
Mather Baseline Risk Assessment			12/19/95	(1/18/96)
Soils and Groundwater ROD			12/19/95	1/18/96
Community Relations Plan (update)	8/29/95	10/30/95	12/29/95	1/29/96
Additional Site Characterization Work Plan Addendum	9/25/95	11/24/95	1/25/96	2/26/96
1995 Groundwater Monitoring Program Evaluation report (GWMPER)	10/13/95	<u>12/12/95*</u>	2/12/96	(3/13/96)
<del>Addendum to S+AP for</del> 1996 Groundwater Monitoring Program Project Plans	<del>11/22/95</del> 20 ✓ <del>11/30/95</del>	1/22/96*	3/22/96	(4/22/96)
<del>Fact Sheet # 3</del> Pipeline Removal Report	<del>Nov 3</del> Dec 3 imminent	Jan 3 (non-IRP document; has relevance to IRP sites 29/B, 35, 36, 37, & 39)		
30-day review } RCRA Closure Report	Nov 3	(Dec 15)		
Landfill Preliminary Definition Report	12/8/95	2/6/96	4/8/96	5/8/96
Landfill Closure Plan	12/22/95	2/20/96	4/22/96	5/22/96
Additional Site Characterization Report	3/19/96	5/20/96	7/19/96	8/19/96
Comprehensive Baseline Risk Assessment	5/1/96**	7/1/96	9/3/96	10/3/96
Final OU Focused Feasibility Study	7/1/96	9/3/96	11/4/96	12/4/96
Final OU Proposed Plan	12/2/96	1/31/97	3/3/97	4/2/97
Final OU ROD	7/1/97	9/2/97	11/3/97	12/3/97

\* Early comments, or early identification of major concerns, are requested in order to complete planning for groundwater sampling to begin in January 1996. \*\*Revised Draft CBRA

ACTW H2S  
SFA

10/13 12/12  
10/13 12/12

WHughes, 11/13/95

~~Baseline SFA~~

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 1



ROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2106

(916) 255-3705

November 29, 1995

Dr. Charles H. Smith, P.E.  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street (H-9-1)  
San Francisco, California 94105-3901

DRAFT FINAL SOILS OPERABLE UNIT AND GROUNDWATER OPERABLE UNIT  
RECORD OF DECISION REQUEST FOR DELIVERY EXTENSION

Dear Dr. Smith and Ms. Lowe:

The United States (US) Air Force and US Environmental Protection Agency have requested additional information regarding the purpose of the State of California's (State) November 22, 1995 extension request for the subject document's delivery date. The State will require additional time to formulate its response. If acceptable to the Base Realignment and Closure Cleanup Team, the State proposes to respond by Friday, December 1, 1995 to the request for additional information.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager  
Office of Military Facilities

cc: See next page.



Dr. Charles H. Smith, P.E.  
Ms. Debbie Lowe  
November 29, 1995  
Page Two

cc: Mr. Bill Hughes  
Operational Technologies Corporation  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

Mr. James Taylor  
Regional Water Quality Control Board  
Central Valley Region  
3443 Routier Road  
Sacramento, California 95827-3098

1830149



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

Dr. Charles H. Smith, PE  
BRAC Environmental Coordinator  
Air Force Base Conversion Agency  
10503 Kaydet Ave.  
Mather, CA 95655

November 22, 1995

Dear Dr. Smith,

Pursuant to Section 7.7 (b) of the Federal Facilities Agreement (FFA), EPA requests a one week extension for review and comment on the Additional Site Characterization Work Plan Addendum. Comments are due November 24, 1995. EPA will provide comments on this document on or before December 1, 1995.

If you have any questions, please feel free to contact me at (415) 744-2206.

Sincerely,

A handwritten signature in cursive script, appearing to read "Debbie Lowe".

Debbie Lowe  
Remedial Project Manager

cc: Kent Strong, DTSC  
James Taylor, RWQCB



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

Dr. Charles H. Smith, PE  
BRAC Environmental Coordinator  
Air Force Base Conversion Agency  
10503 Kaydet Ave.  
Mather, CA 95655

November 22, 1995

Dear Dr. Smith,

EPA has reviewed the November 20, 1995 letter to you from DTSC requesting an extension on the Soil and Groundwater OU ROD and your response dated November 21, 1995. EPA agrees with the concerns that you have raised about this extension, and has sent the attached letter to DTSC to echo your concerns and raise a few others.

If you have any questions, please feel free to contact me at (415) 744-2206.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Lowe".

Debbie Lowe  
Remedial Project Manager



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

Kent Strong  
DTSC, Region I  
10501 Croydon Way, Suite 3  
Sacramento, CA 95827

November 22, 1995

Dear Mr. Strong,

EPA has received your letter requesting an additional fifteen days for the Air Force to revise and produce the Draft Final Soil and Groundwater Operable Unit Record of Decision (ROD). The rationale for the State's extension request is that "the additional time would allow presentation of the issues at the scheduled Regional Water Quality Control Board, Central Valley Region, meeting on January 26, 1996."

Prior to approval of the additional 15 day extension the State has requested, EPA requests that the following information be provided:

- (1) EPA would like a more detailed explanation of the objectives and expectations for the "presentation of the issues" at the January 26, 1995 Board Hearing.
- (2) EPA would like the State to explain how the Board Hearing will fit into the dispute process established by the Federal Facilities Agreement (FFA). The FFA dispute process calls for informal dispute resolution among the Project Managers and/or their immediate supervisors. If agreement is not reached, then the dispute is formalized and addressed by the Dispute Resolution Committee made up of one policy-level individual nominated from each FFA Party. The State representative on the DRC is identified in the FFA Section 12.4 as the Chief of the Site Mitigation Unit of DHS (now DTSC), Region I. If the DRC fails to resolve the dispute within 21 days, the dispute is elevated to the Senior Executive Committee (SEC). The State representative on the SEC is listed as the DHS Chief Deputy Director. The multi-agency nature of CAL-EPA and the RWQCB structure presumably requires more coordination in developing and representing the State in the dispute process. Please clarify the State strategy with respect to the timing of the ROD documents, presentation at the Board Hearing, and the FFA dispute process.

In addition, EPA would like the State to consider the following:

- (1) As required by Section 12.3 of the FFA, the RPMs have met many times to discuss and attempt resolution of how to establish SVE Shutdown Criteria for the ROD. During the Nov 8 RPM meeting, the RPMs agreed that an impasse has been reached, and that it would no longer be productive for the RPMs to continue to discuss the issues. Thus, the informal dispute process has been exhausted, and formal dispute must be invoked in order to resolve this issue. The State's extension request would delay the formal dispute process by fifteen days.

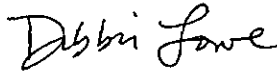


(2) The State extension request would allow the Air Force fifteen additional days to revise the Draft ROD and produce the Draft Final ROD. Since the RPMs have already agreed that this issue cannot be resolved through informal dispute, EPA would like to see the Draft Final document as soon as feasible. Perhaps the State should request additional time for the State to review the Draft Final document, rather than asking for more time for the Air Force to revise the Draft document.

(3) The State has indicated in past conference calls that staff can initiate formal dispute, and then ask the Regional Board members during the next scheduled Board Hearing whether or not they want staff to continue the dispute. EPA asks that the State consider this possible course of action in order to allow the document to remain on its current FFA schedule.

Your response is requested within seven days, in order that the FFA parties reach concurrence on the ROD schedule in a timely manner. If you have any questions, please call me at (415) 744-2206.

Sincerely,



Debbie Lowe  
Remedial Project Manager

cc: James Taylor, RWQCB  
Bill Hughes, OpTech



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830153

21 Nov 95

MEMORANDUM FOR CA DTSC

Attn: Kent Strong  
U.S. EPA  
Attn: Debbie Lowe (H-9-1)

FROM: AFBCA/OL, D  
10503 Kaydet Avenue  
Mather, CA 95655-1101

SUBJECT: State's Request for Additional Document Extensions

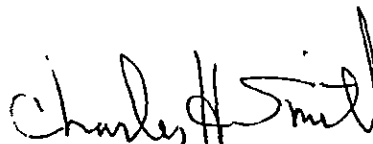
1. My office received the DTSC (State of California) response to the Air Force request for document extensions for delivery of the Revised Draft Final Mather Baseline Risk Assessment (MBRA) and the Draft Final Soils OU and Groundwater OU Record of Decision (ROD). The Air Force request was for an extension from 14 Nov 95 to 19 Dec 95. The State response requests an additional 15 days until 3 Jan 96 for delivery of the Draft Final documents; these documents would then be considered final documents on 2 Feb 96 unless disputed or an alternate date established by mutual consent of the FFA Parties. Based upon the State response and the lack of dissenting response from U.S. EPA, the FFA deadlines are now revised according to the Air Force request of 13 Nov 95.

2. Prior to approval of the additional 15 day extension the State requests, I would like more detailed explanation of the objectives and expectations for the proposed 'presentation of the issues' at the 26 Jan 96 Regional Water Quality Control Board (RWQCB) meeting. It is my understanding that the requested extension would allow a Board position and/or guidance to RWQCB staff prior to the Draft Final ROD becoming a final document, i.e. prior to the deadline for the State or U.S. EPA to file a dispute under the provisions of the Federal Facility Agreement for Mather AFB.

3. It is important for all parties to understand the role of the regional and state water boards in the dispute process established for federal facilities under CERCLA Section 120. The FFA dispute

process calls for informal dispute resolution among the Project Managers and/or their immediate supervisors. If agreement is not reached, then the dispute is formalized and addressed by the Dispute Resolution Committee made up of one policy-level individual nominated from each FFA Party. The State representative on the DRC is identified in FFA Section 12,4 as the Chief of the Site Mitigation Unit of DHS (now DTSC) Region 1. If the DRC fails to resolve the dispute within 21 days, the dispute is elevated to a Senior Executive Committee (SEC). The State representative on the SEC is listed as the DHS Chief Deputy Director. The multi-agency nature of CAL-EPA and the RWQCB structure presumably requires more coordination in developing and representing the State in the dispute process. Please clarify the State strategy with respect to the timing of the ROD document development/ finalization, presentation at the RWQCB meeting(s), and the FFA dispute process.

4. Your response is requested within 7 days, in order that the FFA Parties reach concurrence on the ROD schedule in a timely manner. If you have any questions, please call me at (916) 364-4000 or Bill Hughes (OpTech) at (916) 364-4007.



CHARLES H. SMITH, PhD, P.E.  
BRAC Environmental Coordinator

cc:

HQ AFBCA/LD, Attn: Brent Evans  
HQ AFBCA/NW, Attn: Maj Coretti  
AFCEE/ERB, Attn: Maj Watts  
RWQCB, Attn: James Taylor  
IWMB, Attn: Tamara Zielinski

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL



DIVISION 1

1 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2106

(916) 255-3705

November 20, 1995

Dr. Charles H. Smith, P.E.  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

DRAFT FINAL MATHER BASELINE RISK ASSESSMENT AND DRAFT FINAL SOILS  
OPERABLE UNIT AND GROUNDWATER OPERABLE UNIT RECORD OF DECISION  
REQUEST FOR DELIVERY EXTENSION

Dear Dr. Smith:

On November 13, 1995, the State of California (State) received the United States Air Force's (Air Force) request for extensions of the due dates of the subject documents. In accordance with the Federal Facilities Agreement (FFA), the proposed extensions are for 30 days by Air Force notification and by an additional five days after mutual agreement of the FFA signatories. The State requests that the additional five days be extended to a total of 20 days. If necessary, the additional time would allow presentation of the issues at the scheduled Regional Water Quality Control Board, Central Valley Region, meeting on January 26, 1996. However, this additional time will not be necessary if the FFA signatories come to technical agreement, or if agree-to-disagree language is agreed upon. With the additional extension, the proposed delivery date of the Draft Final documents would be January 3, 1996. The documents would go final February 2, 1996.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager  
Office of Military Facilities

cc: See next page.



Dr. Charles H. Smith, P.E.  
November 20, 1995  
Page Two

cc: Mr. Bill Hughes  
Operational Technologies Corporation  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

Ms. Debbie Lowe  
United States Environmental Protection Agency  
75 Hawthorne Street (H-9-1)  
San Francisco, California 94105

Mr. James Taylor  
Regional Water Quality Control Board  
Central Valley Region  
3443 Routier Road  
Sacramento, California 95827-3098

Mr. Wellington Yee  
URS  
2710 Gateway Oaks Drive, Suite 250-N  
Sacramento, California 95833



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830157

13 Nov 95

MEMORANDUM FOR U.S. EPA

Attn: Debbie Lowe (H-9-1)

CA DTSC

Attn: Kent Strong

FROM: AFBCA/OL,D

10503 Kaydet Avenue

Mather, CA 95655-1101

SUBJECT: Request for Document Extensions

1. As discussed in the Base Cleanup Team meeting on 7 Nov 95, the Air Force hereby requests that the due date for the delivery of the Revised Draft Final Mather Baseline Risk Assessment (MBRA) and the Draft Final Soils OU and Groundwater OU Record of Decision (ROD) be extended from 14 Nov 95 to 19 Dec 95. This extension is required in order to evaluate and resolve comments on the Draft Final MBRA, as agreed by the parties on 31 Oct 95, and make any corresponding changes to the ROD. The first 30 days of this extension requires only notification by the Air Force [FFA Section 7.7(f)], provided by this letter. The additional 5 days requires mutual agreement of the parties [FFA Section 9.2(g)], or a failure to respond within 7 days of this request.

2. In addition, several other dates currently contained in the Appendix D list of draft document due dates must be changed. The Air Force requests that these dates be changed under FFA Section 9.2(g), by mutual agreement of the FFA parties. These dates are listed on the following page.

13 Nov 95 Proposed Revisions to Mather AFB FFA App D:

Document	Draft Date
Community Relations Plan (update)	8/29/95
Landfill Preliminary Definition Investigation Report (secondary document)	12/8/95
Landfill Closure Plan	12/22/95
Additional Site Characterization Report	3/19/96
Comprehensive Baseline Risk Assessment (secondary document)	5/1/96

3. Your prompt response is appreciated. If you have any questions, please call me at (916) 364-4000 or Bill Hughes (OpTech) at (916) 364-4007.



CHARLES H. SMITH, PhD, P.E.  
BRAC Environmental Coordinator

cc:

HQ AFBCA/LD, Attn: Brent Evans  
HQ AFBCA/NW, Attn: Maj Coretti  
AFCEE/ERB, Attn: Maj Watts  
RWQCB, Attn: James Taylor  
IWMB, Attn: Tamara Zielinski



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

1830159

Kent Strong  
Remedial Project Manager  
Dept. Of Toxic Substances Control  
Region I  
10151 Croyden Way, Suite 3  
Sacramento, CA

September 19, 1995

Dear Mr. Strong,

EPA has reviewed your September 12, 1995 letter request for a 21 day extension to the Draft Final Mather Baseline Risk Assessment (MBRA). In accordance with section 9.2 (g) of the FFA, EPA approves your extension request. EPA notes the Air Force's concern that the Soil and Groundwater Record of Decision (ROD) schedule may need to be extended based on this extension request.

If you have any questions, please feel free to contact me at 415-744-2206.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Lowe".

Debbie Lowe  
Remedial Project Manager

cc: Charles Smith, AFBCA





DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830160

13 Sept 95

MEMORANDUM FOR CA DTSC

Attn: Kent Strong

FROM: AFBCA/OL,D  
10503 Kaydet Avenue  
Mather, CA 95655-1101

SUBJECT: FFA Extension Request for Draft Final MBRA Review

1. Your request for an extension has my concurrence as required under FFA section 9.2(g), with the following caveat: if the resolution of the unresolved concerns mentioned in your requesting letter dated 12 Sept 1995 require significant revisions to the Soil and Groundwater Record of Decision (ROD), the Air Force considers the extension of MBRA review period to justify an equivalent extension for the delivery of the Draft Final ROD. However, no extension of the delivery date of the Draft Final ROD will be assumed. Instead, a request will be made if warranted after my office reviews the comments submitted concerning the MBRA.

2. Questions may be addressed to Bill Hughes at (916) 364-4007.

A handwritten signature in black ink, reading "Charles H. Smith".

CHARLES H. SMITH, PhD, P.E.  
BRAC Environmental Coordinator

cc: U.S. EPA, Attn: D. Lowe (H-9-1)  
RWQCB, Attn: J. Taylor  
IWMB, Attn: T. Zielinski

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

JN 1

10151 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2108

(916) 255-3545



September 12, 1995

Mr. Charles H. Smith, P.E.  
Base Realignment and Closure Environmental Coordinator  
AFBCA/OL-D  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

REQUEST FOR FEDERAL FACILITY AGREEMENT (FFA) EXTENSION TO DRAFT  
FINAL MATHER BASELINE RISK ASSESSMENT (MBRA)

Dear Dr. Smith:

The Department of Toxic Substances Control, in accordance with Section 9.2 (g) of the FFA for Mather Air Force Base (AFB), hereby requests a 21 day extension for the review and comment on the MBRA. This request requires the mutual agreement of "good cause" by the FFA parties. Additional time is necessary to study the MBRA's Appendix J (Responsiveness Summary) and how unresolved concerns can best be satisfied. The proposed new date for comment submittal would be on or before October 6, 1995.

If there are any questions or comments regarding this matter, please contact Dan Ward at (916) 255-3676.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager

cc: Ms. Debbie Lowe  
U. S. Environmental Protection Agency  
75 Hawthorne Street (H-9-1)  
San Francisco, California 91405



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830162

31 Aug 95

MEMORANDUM FOR U.S. EPA, Attn: Debbie Lowe (H-9-1)  
CA DTSC, Attn: Kent Strong

FROM: AFBCA/OL,D  
10503 Kaydet Avenue  
Mather, CA 95655-1101

SUBJECT: Approval of Requested Extension for Review Draft Final  
Mather Baseline Risk Assessment to 15 September 1995

1. In response to EPA's letter of 30 Aug 95, the requested extension of the review for the subject document (MBRA) is granted by my office and DTSC. The requested extension is judged to fall under Section 9.2.(g) of the Federal Facility Agreement (FFA), requiring mutual agreement of the parties. This is because an initial 30-day extension under FFA Section 7.7(b) was previously invoked. Kent Strong, Remedial Project Manager for the California Department of Toxic Substances Control, has provided verbal concurrence approving of the requested extension.
2. Notice of an extension of the review period for the Draft Soil and Groundwater Operable Units Record of Decision, under FFA Section 7.7(b) is also acknowledged.
3. The revised due date for both documents is now 15 September, 1995.
4. Questions may be addressed to Bill Hughes at (916) 364-4007.

A handwritten signature in black ink, reading "Charles H. Smith", is positioned above the typed name.

CHARLES H. SMITH, PhD, P.E.  
BRAC Environmental Coordinator

## cc:

CA RWQCB, Attn: James Taylor

CA IWMB, Attn: Tamara Zielinski

HQ AFBCA, Attn: Rafael Vazquez

HQ AFBCA, Attn: Brent Evans

AFCEE/ERB, Attn: Fred Louden

IT Corporation, Attn: Dennis Robinson



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

1830164

Charles H. Smith, PhD, PE  
BRAC Environmental Coordinator  
Air Force Base Conversion Agency  
10503 Kaydet Ave.  
Mather, CA 95655

August 30, 1995

Dear Dr. Smith,

As required by Sections 7.7(b), 7.9 and 9 of the Federal Facility Agreement, EPA requests a fourteen (14) day extension for review, comment and approval of the Draft Final Mather Baseline Risk Assessment (MBRA) and a fourteen (14) day extension for review and comment on the Draft Soil and Groundwater Operable Unit Record of Decision (ROD). The Draft Final MBRA contains new information which was not included in the Draft document and these extensions are being requested to allow additional time for regulatory review of this new information and how it is incorporated into the documents. These extensions will affect the delivery date for the Draft Final Soil and Groundwater ROD. EPA's comments on the Draft Final MBRA and Draft Soil and Groundwater ROD will be provided to you on or before September 15, 1995.

If you have any questions, please feel free to contact me at (415) 744-2206.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Lowe".

Debbie Lowe  
Remedial Project Manager

cc: Kent Strong, DTSC  
James Taylor, RWQCB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 9  
75 Hawthorne Street  
San Francisco, CA 94105

Charles H. Smith, PhD, PE  
BRAC Environmental Coordinator  
AFBCA  
10503 Kaydet Ave.  
Mather, CA 95655

July 28, 1995

Dear Dr. Smith

As required by Section 7.9 and Section 9 of the Federal Facilities Agreement, EPA requests a 30 day extension for review, comment and approval of the Mather Baseline Risk Assessment (MBRA). The MBRA was delivered to EPA's office on June 30, 1995. Comments and/or approval of this document will be provided to you on or before September 1, 1995.

If you have any questions, please feel free to contact me at (415) 744-2206.

Sincerely,

A handwritten signature in black ink, appearing to read "Debbie Lowe".

Debbie Lowe  
Remedial Project Manager

cc: Kent Strong, DTSC  
James Taylor, RWQCB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 9  
75 Hawthorne Street  
San Francisco, CA 94105

1830166

Charles H. Smith, PhD, PE  
BRAC Environmental Coordinator  
AFBCA  
10503 Kaydet Ave.  
Mather, CA 95655

July 28, 1995

Dear Dr. Smith

As required by Section 7.9 and Section 9 of the Federal Facilities Agreement, EPA requests a 30 day extension for review, comment and approval of the Mather Baseline Risk Assessment (MBRA). The MBRA was delivered to EPA's office on June 30, 1995. Comments and/or approval of this document will be provided to you on or before September 1, 1995.

If you have any questions, please feel free to contact me at (415) 744-2206.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Lowe".

Debbie Lowe  
Remedial Project Manager

cc: Kent Strong, DTSC  
James Taylor, RWQCB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

1830167

Charles H. Smith, PhD, PE  
BRAC Environmental Coordinator  
Air Force Base Conversion Agency  
10503 Kaydet Ave  
Mather, CA 95655

July 14, 1995

Dear Dr. Smith

As required by Section 77(b) of the Federal Facilities Agreement, EPA requests a one week extension to review and provide comments on the Remedial Investigation, Additional Characterization, and Remedial Design Support Draft Work Plan. This document was delivered to EPA on May 15, 1995, with comments due on July 14, 1995. EPA will provide comments to you on or before July 21, 1995.

If you have any questions, please feel free to contact me at (415) 744-2206.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Lowe".

Debbie Lowe

cc Kent Strong, DTSC  
James Taylor, RWQCB



Mather Air Force Base  
Appendix D  
*Deadlines for Draft Primary Documents*

In accordance with Section 8 of the Agreement, the following deadlines for submission of draft primary documents have been established as of August 18, 1994.

AC&W Site

Remedial Investigation Report	December 31, 1990
Feasibility Study Report	March 31, 1991
Proposed Plan	June 30, 1991
Record of Decision	December 31, 1991
Preliminary Design Investigation	February 28, 1992

Group 2 Sites

Remedial Investigation Report	March 16, 1992
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Group 3 Sites

Technical Memorandum	May 10, 1993
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AC&W Operable Unit

Remedial Action Work Plan	November 4, 1993
Preliminary Engineering Report	December 29, 1993
Shop Drawings and Specification	February 4, 1994

Groundwater and Soils Operable Units

Additional Field Investigation Work Plan	June 9, 1992
Feasibility Study Work Plan	July 23, 1992
Additional Field Investigation Report	April 26, 1994



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830169

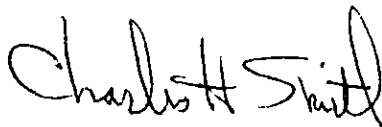
20 April 1995

MEMORANDUM FOR: DEBBIE LOWE, US EPA  
KENT STRONG, DTSC

FROM: AFBCA/OL-D  
10503 Kaydet Ave.  
Mather, CA 95655

SUBJECT: Final Basewide Operable Unit and Proposed Document Deadlines

1. The Air Force proposes a new operable unit at Mather to be called the "Final Basewide Operable Unit (OU)". The Final Basewide OU shall be comprised of newly identified sites that are suspected or known to have contamination, and existing Installation Restoration (IRP) sites that need further characterization before a final remedy can be selected. A remedial investigation is planned for the coming field season to investigate sites within the new OU and provide additional data at sites that shall be included in the record of decision for the Groundwater and Soils OUs.
2. The Air Force also proposes deadlines for completion of draft primary documents for the Final Basewide OU remedial investigation/ feasibility study and the Landfill OU remedy. Attached is a revised Appendix D to the Mather Federal Facility Agreement (FFA) incorporating the document deadline dates. Please review the revised Appendix D and provide comments regarding the proposed deadlines in accordance with Section 8 of the FFA.
3. A non-time critical removal action is planned for several sites within the Soils OU. The scope of the removal action is to excavate shallow contaminated soil consistent with the preferred alternatives developed in the Draft Final Groundwater and Soils OUs Focused Feasibility Study Report. A removal action memorandum (RAM) shall be prepared for regulatory review and Air Force signature. The Air Force shall submit the RAM to the regulators by June 1, 1995.
4. If you have any questions please contact myself at (916) 364-4000, or Bill Hughes or Mike Johnson at (916) 364-4007.

  
CHARLES H. SMITH, Ph.D, P.E.  
BRAC Environmental Coordinator

Attachment: Appendix D

cc: James Taylor, CVRWQCB

**Mather Air Force Base  
Appendix D  
Deadlines for Draft Primary Documents**

In accordance with Section 8 of the agreement, the following deadlines for submission of future draft primary documents have been established as of April 21, 1995.

Groundwater and Soils Operable Units

Record of Decision	July 3, 1995
Mather Baseline Risk Assessment (Draft Final)	July 3, 1995

Landfill Operable Unit

Preliminary Definition Investigation Work Plan	August 3, 1995
Preliminary Definition Investigation Report	November 3, 1995
Landfill Closure Plans	September 18, 1995

Final Basewide Operable Unit

Additional Site Characterization Work Plan	May 12, 1995
Additional Site Characterization Report	December 22, 1995
Feasibility Study Report	July 1, 1996
Proposed Plan	December 2, 1996
Record of Decision	July 1, 1997



March 16, 1995

IT Project No. 191126

Captain Chris Miller  
Team Chief  
AFCEE/ERB  
8001 Inner Circle Drive, Suite 2  
Brooks Air Force Base, Texas 78235-5328

Request for a Schedule Extension  
for the Soil and Groundwater OU Focused Feasibility Study Report

Dear Captain Miller:

The purpose of this letter is to request a schedule extension for the Soil and Groundwater OU Focused Feasibility Study Report due to be published on March 20, 1995. IT is requesting a one week extension to March 27, 1995.

The extension is necessary to allow IT sufficient time to develop responses to comments that were only recently resolved (i.e. in early March) and to allow adequate time to provide the QA review that the Air Force expects and that is required by the Quality Assurance Project Plan and IT Policies and Procedures. One of the comments recently resolved was the incorporation of the petroleum exclusion for eight sites, the elimination of four sites from the FFS, and the addition of one site to the document. Those changes alone, while not technically challenging, require that IT reformat or alter almost the entire four volume document. That, in turn, will require a significant QC effort to ensure that all tables, figures, and sections of text are properly referenced. Furthermore, there are meetings taking place today to discuss ARARs and other issues related to the FFS. It is IT's understanding that that meeting will not generate any additional changes to the FFS, but some of the issues pertaining to the FFS that are being discussed are not resolved.

Once the document is final, it will require about three days to have it reproduced and distributed.

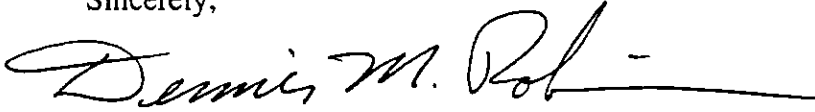
Regional Office  
4585 Pacheco Boulevard • Martinez California 94553-2233 • 510-372-9100

IT Corporation is a wholly owned subsidiary of International Technology Corporation

1830172

Should you need any additional information, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Dennis M. Robinson". The signature is written in black ink and includes a horizontal line extending to the right from the end of the name.

Dennis M. Robinson, D.Env.  
Project Manager

cc:

P. Bernheisel  
W. Huges  
T. Searls  
C. Smith  
T. Wong



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY


20 Feb 95

MEMORANDUM FOR U.S. EPA, REGION IX  
ATTN: DEBBIE LOWE (H-9-1)  
75 Hawthorne Street  
San Francisco, CA 94105-3901

FROM: AFBCA/OL-D  
10503 Kaydet Avenue  
Mather, CA 95655

SUBJECT: Requested Extension, Groundwater OU and Soil OU Draft  
Final Focused Feasibility Study Report

1. The Air Force Base Disposal Agency hereby requests a 7-day extension for the delivery of the Groundwater Operable Unit (OU) and Soil OU Draft Final Focused Feasibility Study (FFS) Report at Mather AFB. The requested extension would delay the delivery date from 20 March to 27 March 1995. This extension is sought in order to complete revision to incorporate the comment resolutions developed in conjunction with you and the California RPMS.
2. This request is made according to the provisions of Section 9 of the Federal Facility Agreement for Mather Air Force Base. The approval of this request requires agreement between the parties per clause 9.2(g) of the FFA, "Any other event or series of events mutually agreed to be the parties as constituting good cause."
3. Your prompt reply would be appreciated. Questions should be addressed to me or to Bill Hughes at (916) 364-4004 or (916) 364-4007.

  
ANTHONY C. WONG  
Remedial Project Manager

cc: Kent Strong, CA DTSC  
James Taylor, RWQCB  
Tamara Zielinski, CA IWMB  
Rafael Vazquez, AFBDA/NW  
Capt Miller, AFCEE/ESB



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

9 Feb 95

MEMORANDUM FOR U.S. EPA, REGION IX  
ATTN: Debbie Lowe (H-9-1)  
75 Hawthorne Street  
San Francisco, CA 94105-3901

FROM: AFBCA/OL-D  
10503 Kaydet Avenue  
Mather, CA 95655

SUBJECT: Requested Extension, Groundwater OU and Soil OU Draft Proposed Plan

1. The Air Force Base Disposal Agency hereby requests an extension for the delivery of the Mather AFB Groundwater Operable Unit (OU) and Soil OU Draft Proposed Plan. The requested extension would delay the delivery date from 2 February 1995 to 8 February 1995. This extension is sought in order for IT Corporation to complete revisions recommended in their internal peer review process. The Air Force elected to delay distribution until these revisions were incorporated, rather than distribute a document that did not satisfy the contractor's internal review standards.
2. A 30-day review is still requested for the Draft Proposed Plan, to support a public comment period beginning in to mid-April, and thereby maintain the current FFA delivery date for the Groundwater OU and Soil OU Draft Record of Decision (3 July 1995).
3. This request is made according to the provisions of Section 9 of the Federal Facility Agreement for Mather Air Force Base. The approval of this request requires agreement between the parties per clause 9.2(g) of the FFA, "Any other event or series of events mutually agreed to be the parties as constituting good cause."
4. The proposed dates are summarized below.

Document	Current Due Date	Proposed Date
Draft Proposed Plan	2 February 1995	8 February 1995

(This schedule assumes a 30-day public comment period beginning in mid-April 1995; responsiveness summary would be incorporated in Draft ROD due 3 July 1995.)

5. Your prompt reply would be appreciated. Questions should be addressed to me or to Bill Hughes at (916) 364-4007.



ANTHONY C. WONG  
--- Remedial Project Manager

cc: Kent Strong, CA DTSC  
James Taylor, RWQCB  
Tamara Zielinski, CA IWMB  
Rafael Vazquez, AFBDA/NW  
Capt Miller, AFCEE/ESB





DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

15 Dec 94

MEMORANDUM FOR U.S. EPA, REGION IX  
ATTN: DEBBIE LOWE (H-9-1)  
75 Hawthorne Street  
San Francisco, CA 94105-3901

FROM: AFBCA/OL-D  
10503 Kaydet Avenue  
Mather, CA 95655

SUBJECT: Requested Extension, Groundwater OU and Soil OU Draft  
Final Focused Feasibility Study Report, and Proposed Plan

1. The Air Force Base Disposal Agency hereby requests an extension for the delivery of the Groundwater Operable Unit (OU) and Soil OU Draft Final Focused Feasibility Study (FFS) Report at Mather AFB. The requested extension would delay the delivery date from 19 December 1994 to 16 February 1995. This extension is sought in order to incorporate the extensive revisions agreed to during comment resolution, and to address the remaining unresolved comments on the document. The extension is necessary in part because of these unresolved issues and in part because of the unanticipated efforts required to produce the Draft Final Record of Decision for the Landfill OU. Extending the production of the FFS document into the holidays also limits resources through that period. As discussed with you and Kent Strong, this proposal includes the delivery of a review draft to the FFA parties on 18 January, with comments on the revisions requested by 1 February, and the issuance of the Draft Final FFS on 16 February 1995.

2. As a result of the proposed FFS schedule extension, the Draft Proposed Plan would be delayed by two weeks to 2 February 1995. A 30-day review is requested for the Draft Proposed Plan, to support a public comment period beginning in early to mid-April, and thereby maintain the current FFA delivery date for the Groundwater OU and Soil OU Draft Record of Decision (3 July 1995).

3. This request is made according to the provisions of Section 9 of the Federal Facility Agreement for Mather Air Force Base. The approval of this request requires agreement between the parties per clause 9.2(g) of the FFA, "Any other event or series of events mutually agreed to be the parties as constituting good cause."

4. The proposed dates are summarized below.

Document	Current Due Date	Proposed Date
Draft Final FFS Report	19 December 1994	16 February 1995
Draft Proposed Plan	21 January 1995	2 February 1995

(This schedule assumes a 30-day public comment period beginning in early to mid-April 1995; responsiveness summary would be incorporated in Draft ROD due 3 July 1995.)

5. Your prompt reply would be appreciated. Questions should be addressed to me or to Bill Hughes at (916) 364-3317 or (916) 364-3319.



ANTHONY C. WONG  
Remedial Project Manager

cc: Kent Strong, CA DTSC  
James Taylor, RWQCB  
Tamara Zielinski, CA IWMB  
Rafael Vazquez, AFBDA/NW  
Capt Miller, AFCEE/ESB



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830178

8 November 1994

MEMORANDUM FOR US ENVIRONMENTAL PROTECTION AGENCY  
ATTENTION: DEBBIE LOWE

AND

FOR DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
ATTENTION: KENT STRONG

FROM: AFBCA/OL-D  
10503 KAYDET AVE  
MATHER, CA 95655

SUBJECT: Notice to Extend Delivery Date of Draft Final Landfill OU Record of Decision

1. The Air Force Base Conversion Agency needs to extend the period for revising the Draft Final Landfill Operable Unit Record of Decision. The extension shall be for thirty (30) days with delivery of the document on or before 12 December 1994. The Air Force is providing this extension notice in accordance with Section 7.7, paragraph (f) of the Federal Facilities Agreement for Mather AFB. The extension is necessary to allow the State to analyze whether certain California regulations are more stringent than federal regulations in order to determine their status as ARARS for the Landfill OU remedial action. In addition the Air Force agreed to incorporate recently provided substantive waste discharge requirements in the ROD. Other ARAR issues also need to be resolved, particularly regarding wetland and water quality determination, and air quality emission unit regulations, before the ROD should be allowed to become draft final.

2. Delivery of the Draft Final Landfill ROD was extended for thirty days once before by consensus of the Federal Facility Agreement parties. The purpose of that extension was primarily to resolve ARAR issues. Some of the ARAR issues to be resolved during the current extension were not resolved during the last extension. Since issuance of the ROD has already been extended for 60 days, the Air Force is extremely reluctant to seek or approve any further extensions. It is essential for the Remedial Project Managers to resolve all remaining ARAR issues during this extension period because the Air Force intends to deliver the Draft Final ROD on 12 December.

1830179

3. If you have any question or are in need of further information please contact Mike Johnson at (916) 364-4007.

A handwritten signature in black ink, appearing to read 'ath C Wong', with a long horizontal flourish extending to the right.

ANTHONY C. WONG  
Remedial Project Manager

cc: Capt Chris Miller, AFCEE  
Tony Searles, IT Corp  
James Taylor, RWQCB  
Tamara Zielinski, IWMB



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

2 November 1994

MEMORANDUM FOR DEBBIE LOWE  
US ENVIRONMENTAL PROTECTION AGENCY

AND

FOR KENT STRONG  
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

FROM: AFB/CA/OL-D  
10503 KAYDET AVE.  
MATHER, CA 95655

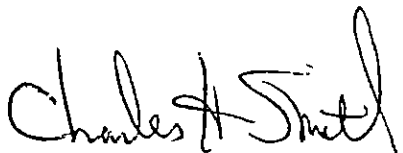
SUBJECT: Draft Final FFS Report Extension, Proposed Soil Excavation Removal Action, and Sites 20, 29, and 32 Removal Action Document Delivery Dates

1. The Air Force Base Conversion Agency needs to extend the sixty (60) day period for responding to comments on the Draft Groundwater Operable Unit (OU) and Soils OU Focused Feasibility Study (FFS) Report and issuing the Draft Final Report. The extension shall be for thirty (30) days with delivery of the document on or before 19 December 1994. The Air Force is providing this extension notice in accordance with Section 7.7, paragraph (f) of the Federal Facilities Agreement (FFA) for Mather AFB. The extension is necessary to allow for additional groundwater modeling sensitivity analysis requested by the regulatory agencies at the FFS comment resolution meeting held on 5 October 1994. Attached is a revised Appendix D of the FFA which includes new dates for the delivery of the Groundwater OU and Soils OU Proposed Plan and Record of Decision.
2. The Air Force plans a removal action to excavate then treat or dispose of contaminated soil at thirteen IRP Sites. The primary purpose of the removal action is to mitigate impacts to soil and groundwater from the migration of near surface contamination and protect public health and safety from possible exposure of toxic contaminants from near surface soils. A secondary purpose is to generate soils that, once treated to or determined to meet acceptable criteria, could be used as foundation material in the closing landfill covers planned at Mather. The removal action would also benefit base conversion by cleaning up surface contamination to an extent that may allow for property development. The scope of the removal action is the limited excavation of contaminated soil and ditch sediment followed by bioremediation of fuel contaminated soil, and the off-base disposal of soil contaminated with dioxin, pesticides or metals. The attached Appendix D includes delivery dates for a Removal

Action Plan (RAP) and a Removal Action Memorandum (RAM). An Engineering Evaluation and Cost Analysis Report has not prepared for this action since the proposed removal action alternatives have been developed and evaluated in the Soils OU FFS Report. To accommodate the aggressive project schedule planned by the Air Force, we request that you complete your review of these draft documents within thirty (30) days of their issuance.

3. The Air Force is providing (separate attachment) projected dates for the delivery of documents supporting the removal actions at IRP Sites 20, 29, and 32. To accommodate removal action project schedules, the Air Force has scheduled a two week regulatory review of these documents. The removal action documents shall include a general contract management document titled Quality Project Plans (QPP) and site-specific and remedial action specific QPPs which shall provide the sampling and analysis, and construction plans for each site.

4. If you have any question or are in need of further information please contact Mike Johnson at (916) 364-4007.



CHARLES H. SMITH, Ph.D., P.E.  
BRAC Environmental Coordinator

Attachments: 1. Appendix D  
2. Removal Action  
Document Dates

cc: Stephen Crane, MW  
Capt Miller, AFCEE  
Dennis Robnison, IT  
James Taylor, RWQCB  
Rafael Vazquez, AFBCA  
Tamara Zielinski, IWMB

## Removal Action Document Delivery Schedule for Sites 20, 29, and 32.

<u>Deliverable</u>	<u>Expected Date for Delivery</u>
Contract Management QPP	16 January, 1995
Site 20/ Site- Specific QPP (SAP, HSP, & CQP)	16 January, 1995
Site 29/ Site Specific QPP (SAP, HSP, and CQP)	19 December, 1995
Site 29/ Air Monitoring Plan (Bioventing and Air Sparging)	27 February, 1995
Site 29/ Field Construction Drawings (Bioventing):	
- Well Details/ Well Spacing and Calc's	19 December, 1994
- All Other Drawings	27 February, 1995
Site 29/ Field Construction Drawings (Air Sparging):	
- Well Details/ Well Spacing and Calc's	23 January, 1995
- All Other Drawings	27 February, 1995
Site 29/ O&M Plan (Bioventing)	3 April, 1995
Site 29/ O&M Plan	3 April, 1995
Site 32/ Site Specific QPPs	13 February, 1995
Soils Management Area/ Site Specific QPP (Bioremediation Facility)	19 December, 1994
Soils Management Area/ Field Construction Drawings (Bioremediation Facility)	19 December, 1994
Soils Management Area/ O&M Plan (Bioremediation Facility)	2 January, 1994

Mather Air Force Base  
Appendix D  
Deadlines for Draft Primary Documents

In accordance with Section 8 of the Agreement, the following deadlines for submission of future draft primary documents have been established as of November 2, 1994.

Groundwater and Soils Operable Units

Proposed Plan	January 19, 1994 <sup>5</sup>
Record of Decision	July 3, 1995
Mather Baseline Risk Assessment (Draft Final)	July 3, 1995

Removal Action at Thirteen Sites in the Soil Operable Unit

Removal Action Plan	November 15, 1994
Removal Action Memorandum	April 3, 1995



**Consensus Statement for Extending FFA Delivery Date for the Draft Final Record of Decision for the Landfill Operable Unit**

1. Several comments and concerns remain to be resolved and incorporated into the Draft Final Record of Decision (ROD) for the Landfill Operable Unit. Issues remaining to be resolved during the 6 October 1994 comment resolution meeting included application of ARARs for consolidation of waste, the desire for a comparison of federal and state ARARs, clean-up standards for soils remaining under the excavated refuse, application of air ARARs, and the incorporation of the substantive portions of waste discharge requirements (WDRs) into the ROD. Satisfactory resolution of these concerns and the remaining outstanding comments is not possible in time to incorporate them into the draft final document for reproduction and distribution by the 11 October delivery date, as there is only one work day remaining prior to the delivery date.

2. Two options were considered: either the draft final document could be issued on time without resolution of all concerns, and changes made to the draft final document, or the issuance of draft final document could be delayed in order to develop and incorporate resolutions to these concerns. The latter option is preferred by the Remedial Project Managers.

3. Therefore it is hereby agreed that a 30-day extension will be added to the delivery date for the Draft Final Record of Decision for the Landfill Operable Unit. The revised delivery date will be 10 November 1994.

**Signatures:**

Debbie Lowe

Debbie Lowe (H-9-1)  
Remedial Project Manager  
U.S. Environmental Protection Agency, Region IX

October 6, 1994

date

Kent Strong

Kent Strong  
Remedial Project Manager  
Base Closure Unit, Department of Toxic Substances Control

Oct 6, 1994

date

Anthony C. Wong

Anthony C. Wong  
Remedial Project Manager  
Air Force Base Conversion Agency/OL-D

Oct 7, 1994

date

DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

18 Aug. 1994

REPLY TO

ATTN. OF: AFBCA/OL-D/EV  
10503 Kaydet Ave.  
Mather, CA 95823SUBJ: Request for Extension, Draft Final Comprehensive Baseline Risk  
Assessment ReportTO: Debbie Lowe (H-9-1)  
U.S. EPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

and,

Kent Strong  
California EPA  
Department of Toxic Substance Control  
10503 Croydon Way  
Sacramento, CA

1. The Air Force Base Conversion Agency hereby submits a proposed revision to Appendix D of the Federal Facility Agreement (FFA) for Mather Air Force Base. The proposed Appendix D reflects RPM consensus for delivery of the Draft Final Mather Baseline Risk Assessment on 3 Jul 1995. Revised dates for delivery of the Soils and Groundwater Operable Units Draft Proposed Plan and Draft ROD are also proposed due to state extension for review of the Focused Feasibility Study and the need to incorporate responsiveness summaries into draft RODs.

2. Questions should be addressed to me or to Mike Johnson at (916) 364-4000 or (916) 364-4007.

Handwritten signature of Anthony C. Wong in black ink.

ANTHONY C. WONG  
Remedial Project Managercc: Kent Strong, CA DTSC  
James Taylor, CVRWQCB  
Rafael Vazquez, AFBCA  
Capt. Miller, AFCEE/ERB-----  
Atch Appendix D  
-----

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 1

1 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2106

(916) 255-3545



August 26, 1994

Mr. Anthony Wong  
Remedial Project Manager  
AFBCA/OL-D  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

REQUEST FOR FEDERAL FACILITY AGREEMENT (FFA) EXTENSION TO DRAFT  
GROUNDWATER OPERABLE UNIT AND SOIL OPERABLE UNIT FOCUSED  
FEASIBILITY STUDY (FFS) REPORT

Dear Mr. Wong:

The Department of Toxic Substances Control (DTSC), in accordance with Sections 9.1 and 9.2 (g) of the FFA for Mather Air Force Base (AFB), hereby requests a sixteen day extension for the review and delivery of Draft FFS comments. California Environmental Protection Agency comments will be delivered on or before September 16, 1994. The extension is requested as a result of the comprehensive and complex review required for the Draft FFS. The requested Draft FFS comments delivery date extension may result in a similar delay to the delivery of the Soils and Groundwater Operable Unit Proposed Plan and Record of Decision.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager

cc: Ms. Debbie Lowe  
U. S. Environmental Protection Agency  
75 Hawthorne Street (H-9-1)  
San Francisco, California 91405

Mr. James Taylor  
Regional Water Quality Control Board  
Central Valley Region  
3443 Routier Road  
Sacramento, California 95827-3098



1830187

Mr. Anthony Wong  
August 26, 1994  
Page Two

cc: Ms. Tamara Zielinski  
Integrated Waste Management Board  
Closure and Waste Management Board  
8800 Cal Center Drive  
Sacramento, California 95826

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Mather Air Force Base  
Appendix D  
Deadlines for Draft Primary Documents

In accordance with Section 8 of the Agreement, the following deadlines for submission of draft primary documents have been established as of August 18, 1994.

AC&W Site

Remedial Investigation Report	December 31, 1990
Feasibility Study Report	March 31, 1991
Proposed Plan	June 30, 1991
Record of Decision	December 31, 1991
Preliminary Design Investigation	February 28, 1992

Group 2 Sites

Remedial Investigation Report	March 16, 1992
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Group 3 Sites

Technical Memorandum	May 10, 1993
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AC&W Operable Unit

Remedial Action Work Plan	November 4, 1993
Preliminary Engineering Report	December 29, 1993
Shop Drawings and Specification	February 4, 1994

Groundwater and Soils Operable Units

Additional Field Investigation Work Plan	June 9, 1992
Feasibility Study Work Plan	July 23, 1992
Additional Field Investigation Report	April 26, 1994

Focused Feasibility Study Report	June 3, 1994
Proposed Plan	November 16, 1994
Record of Decision	July 3, 1995
Mather Baseline Risk Assessment (Draft Final)	July 3, 1995
<u>Landfill Operable Unit</u>	
Focused Feasibility Study Report	April 23, 1993
Proposed Plan	June 22, 1993
Record of Decision	May 13, 1994



DEPARTMENT OF THE AIR FORCE  
AIR FORCE BASE CONVERSION AGENCY

1830190

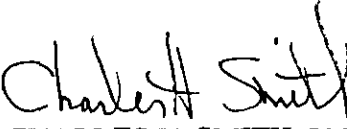
3 Aug 94

MEMORANDUM FOR DEBBIE LOWE, US EPA  
KENT STRONG, CA EPA/DTSC  
JAMES TAYLOR, CA EPA/RWQCB  
TAMARA ZIELINSKI, CA EPA/TWMB  
JORGE DEGUZMAN, SMAQMD

FROM: AFBCA/OL,D  
10503 Kaydet Avenue  
Mather, Ca 95655-1101

SUBJECT: Remedial Project Manager (RPM), Quality Assurance Evaluator (QAE) for Mather AFB.

1. Effective immediately, Mr Tony Wong will be the Remedial Project Manager for Mather AFB. All correspondence regarding the Installation Restoration Program (IRP) should be directed to Tony or to me. His phone number is (916) 364-4004.
2. Effective immediately, Mr Brian Hovander will be the Quality Assurance Evaluator (QAE) for all Mather construction programs. All correspondence regarding Quality Assurance should be directed to Brian or to me. His phone number is (916)364-4000.
3. I will still be the Base Environmental Coordinator (BEC), but in my absence, Mr Tony Wong will act in my place with the full authority of the BEC.
4. If there are any questions, please contact me at (916) 364-4000.

  
CHARLES H. SMITH, PhD, P.E.  
Base Environmental Coordinator

cc: AFBCA/OL,D (Roy)  
AFBCA/NW

14 April 1994

**Consensus Statement for Revising FFA Review Period for the Draft Record of Decision for the Landfill Operable Unit**

1. Several extensions were agreed upon by the RPMs during the finalization of the Focused Feasibility Study (FFS) for the Landfill Operable Unit. The public meeting was scheduled as soon as possible after the FFS was available in order to maintain progress as close to the original schedule as possible. This resulted in the Draft Record of Decision (ROD) for the Landfill Operable Unit (OU) being issued prior to the end of the public comment period, and therefore issued without the Responsiveness Summary.

2. The extensive public comment received from the County of Sacramento and the on-going concern of balancing remediation and re-use objectives compels the FFA parties to agree that the regulatory agencies be afforded the full review period in order to assess the Responsiveness Summary.

3. Therefore it is hereby agreed that the Draft Responsiveness Summary will be delivered by 13 May 1994, and that the FFA parties will thereupon initiate the 60-day review period for the Draft Landfill OU ROD per FFA Section 7.7(b).

4. As discussed in the 14 April 1994 Base Cleanup Team meeting, the resolution of landfill cost estimating issues that may impact the landfill remedies selected in the ROD will require additional effort and resource allocation by the Air Force. This will in turn cause a delay of two weeks in the delivery of the Draft Soils and Groundwater Operable Unit Focused Feasibility Study and follow-on documents. Therefore, the FFA Appendix D deliverable dates for these draft Soils and Groundwater Operable Unit documents is hereby extended by two weeks.

**FFA Deliverable Dates for Draft Documents:**

Groundwater/Comprehensive Operable Unit

	Old date	New date
Focused Feasibility Study	June 4, 1994	June 20, 1994
Proposed Plan	October 8, 1994	October 24, 1994
Record of Decision	February 4, 1995	February 21, 1995



14 April 1994

**Consensus Statement for Revising FFA Review Period for the Draft  
Record of Decision for the Landfill Operable Unit**

FFA Deliverable Dates for Draft Documents:

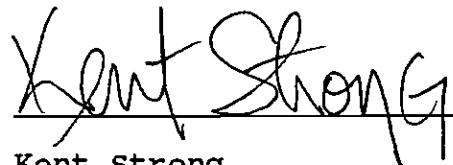
Soils Operable Unit

	Old date	New date
Focused Feasibility Study	June 4, 1994	June 20, 1994
Proposed Plan	October 8, 1994	October 24, 1994
Record of Decision	February 4, 1995	February 21, 1995

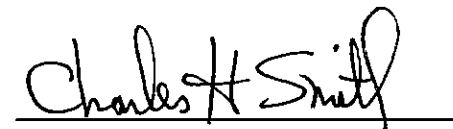
**Signatures:**



Debbie Lowe (H-9-1)  
Remedial Project Manager  
U.S. EPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901



Kent Strong  
Remedial Project Manager  
Base Closure Unit  
Department of Toxic Substances Control  
10151 Croydon Way, Suite 3  
Sacramento, CA 95827-2106



Charles H. Smith PhD, P.E.  
Remedial Project Manager  
AFBCA/OL-D

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

10151 CROYDON WAY, SUITE 3  
SACRAMENTO, CA 95827-2106



(916) 255-3545

Mr. Anthony Wong  
Acting Remedial Project Manager  
AFBCA/OL-D  
10503 Kaydet Avenue (Building 2527)  
Mather, California 95655

REQUEST FOR FEDERAL FACILITY AGREEMENT (FFA) EXTENSION TO DRAFT  
LANDFILL OPERABLE UNIT (OU) RECORD OF DECISION (ROD)

Dear Mr. Wong:

The Department of Toxic Substances Control (DTSC), in accordance with Section 7.7 (b) of the FFA for Mather Air Force Base (AFB), hereby requests a 30 day extension for the review and delivery of Draft Landfill OU ROD comments due July 12, 1994. DTSC's comments will be delivered on or before August 11, 1994. This extension is requested so that recent discussions regarding the costs related to implementing the proposed remedial alternatives can be carefully considered.

If there are any questions or comments regarding this matter, please contact me at (916) 255-3705.

Sincerely,

A handwritten signature in black ink that reads "Kent Strong".

Kent Strong  
Remedial Project Manager  
Office of Military Facilities

cc: Ms. Debbie Lowe  
U. S. Environmental Protection Agency  
75 Hawthorne Street (H-9-1)  
San Francisco, California 91405



Mr. Anthony Wong

Page Two

cc: Mr. James Taylor  
Regional Water Quality Control District  
Central Valley Region  
3443 Routier Road  
Sacramento, California 95827-3098

Ms. Tamara Zielinski  
California Integrated Waste Management Board  
Closure and Remediation Branch  
8800 Cal Center Drive  
Sacramento, California 95826

DEPARTMENT OF  
TOXIC SUBSTANCES CONTROL  
10151 CROYDON WAY, SUITE 3  
SACRAMENTO, CALIFORNIA 95827-2106  
(916)255-3545



TELECOPIER MESSAGE

DATE: 7/12/94

PLEASE DELIVER ASAP

TO: Tony Wong, Debbie Lowe, Tamara  
Zurlo-ski, James Taylor

FROM: Bill Strong

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

# of pages ▶

To	<u>Debbie Lowe</u>	From	<u>Bill (found it)</u>
Dept./Agency	<u>4-9-1</u>	Phone #	
Fax #		Fax #	

SPECIAL INSTRUCTIONS:

NSN 7540-01-917-7368 6899-101 GENERAL SERVICES ADMINISTRATION

Draft Landfill OU ROD  
Extension

NUMBER OF PAGES INCLUDING COVER SHEET: 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

75 Hawthorne Street  
San Francisco, CA 94105-3901

Anthony Wong  
Acting BRAC Environmental Coordinator  
Air Force Base Conversion Agency, OL-D/EV  
10503 Kaydet Avenue  
Mather, CA 95655

June 3, 1994

Dear Mr. Wang,

As there are several FFA documents currently in the regulatory review cycle, I wanted to take a moment to clarify when comments are due for each of the documents. According to my records, below are the dates that the documents were received and the dates by which EPA and the State comments are due to the Air Force, based on a 60 day review period. If your understanding of these dates is different from what is listed below, please contact me as soon as possible.

<u>Document</u>	<u>Date Received</u>	<u>Date Comments Due</u>
Additional Field Investigations Report	4/25/94	6/24/94
Quality Project Plans	5/11/94	7/19/94
Landfill Record of Decision	5/13/94	7/12/94
Groundwater & Soil Focused Feasibility Study	6/2/94	8/1/94

If you have any questions, please do not hesitate to contact me at (415) 744-1490.

Sincerely,

Debbie Lowe  
Remedial Project Manager

cc: Thelma Estrada, EPA  
James Taylor, RWQCB  
Kent Strong, DTSC

14 April 1994

**Consensus Statement for Revising FFA Review Period for the Draft Record of Decision for the Landfill Operable Unit**

1. Several extensions were agreed upon by the RPMs during the finalization of the Focused Feasibility Study (FFS) for the Landfill Operable Unit. The public meeting was scheduled as soon as possible after the FFS was available in order to maintain progress as close to the original schedule as possible. This resulted in the Draft Record of Decision (ROD) for the Landfill Operable Unit (OU) being issued prior to the end of the public comment period, and therefore issued without the Responsiveness Summary.

2. The extensive public comment received from the County of Sacramento and the on-going concern of balancing remediation and re-use objectives compels the FFA parties to agree that the regulatory agencies be afforded the full review period in order to assess the Responsiveness Summary.

3. Therefore it is hereby agreed that the Draft Responsiveness Summary will be delivered by 13 May 1994, and that the FFA parties will thereupon initiate the 60-day review period for the Draft Landfill OU ROD per FFA Section 7.7(b).

4. As discussed in the 14 April 1994 Base Cleanup Team meeting; the resolution of landfill cost estimating issues that may impact the landfill remedies selected in the ROD will require additional effort and resource allocation by the Air Force. This will in turn cause a delay of two weeks in the delivery of the Draft Soils and Groundwater Operable Unit Focused Feasibility Study and follow-on documents. Therefore, the FFA Appendix D deliverable dates for these draft Soils and Groundwater Operable Unit documents is hereby extended by two weeks.

**FFA Deliverable Dates for Draft Documents:**

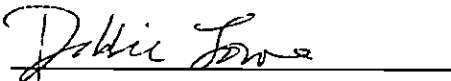
Groundwater/Comprehensive Operable Unit

	Old date	New date
Focused Feasibility Study	June 4, 1994	June 20, 1994
Proposed Plan	October 8, 1994	October 24, 1994
Record of Decision	February 4, 1995	February 21, 1995

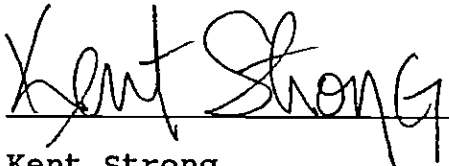
14 April 1994

**Consensus Statement for Revising FFA Review Period for the Draft Record of Decision for the Landfill Operable Unit****FFA Deliverable Dates for Draft Documents:**Soils Operable Unit

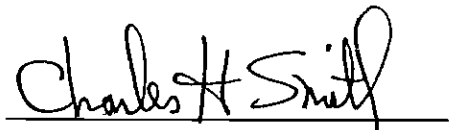
	Old date	New date
Focused Feasibility Study	June 4, 1994	June 20, 1994
Proposed Plan	October 8, 1994	October 24, 1994
Record of Decision	February 4, 1995	February 21, 1995

**Signatures:**


Debbie Lowe (H-9-1)  
Remedial Project Manager  
U.S. EPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901



Kent Strong  
Remedial Project Manager  
Base Closure Unit  
Department of Toxic Substances Control  
10151 Croydon Way, Suite 3  
Sacramento, CA 95827-2106



Charles H. Smith PhD, P.E.  
Remedial Project Manager  
AFBCA/OL-D



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS AIR FORCE BASE DISPOSAL AGENCY



01 MAR 1994

REPLY TO

ATTN OF: AFBCA/OL-D  
10503 Kaydet Avenue (Building 2527)  
Mather, CA 95655

SUBJ: Revised Appendix D to Mather AFB Federal Facility Agreement

TO: Debbie Lowe (H-9-1), U.S. EPA Region IX  
Kent Strong, CA DTSC

1. A revised Appendix D to Mather AFB Federal Facility Agreement is attached. This revision incorporates the following approved changes to the delivery dates for draft documents for the AC&W Remedial Action and the Draft Record of Decision for the Landfill Operable Unit at Mather AFB. The former changes were proposed by my office by letter of 4 January 1994, and the latter by letter of 15 November 1993. In addition, the Appendix D dated 15 September 1993 listed draft final dates for the Focused Feasibility Study and Proposed Plan for the Landfill OU. These are corrected to the draft dates in the Appendix D transmitted herein.

Draft Document

Approved Due Date

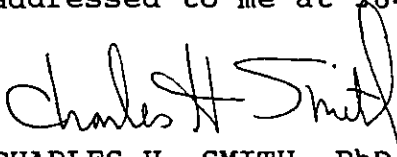
AC&W Remedial Action Work Plan	4 November 1993
AC&W Preliminary Engineering Report (includes Process & Instrumentation Diagrams)	29 December 1993
AC&W Shop Drawings and Specifications	4 February 1994
Landfill Focused Feasibility Study	23 April 1993
Landfill Proposed Plan	22 June 1993
Landfill Record of Decision*	14 February 1994

\*(Because the public comment period was set for 1 Feb to 3 Mar 94, the responsiveness summary will follow delivery of the Draft ROD)



1830200

2. Please add the revised Appendix D to your copy (copies) of the Federal Facility Agreement for Mather AFB. Questions should be addressed to me at 364-4000 or to Bill Hughes at (916) 364-4007.



CHARLES H. SMITH, PhD, P.E.  
Remedial Project Manager

Atch: Revised Appendix D

cc:  
Camilla Williams, CVRWQCB  
Tamara Zielinski, CA IWMB  
Naim Qazi, AFBDA/NW  
Jim Snyder, AFCEE/ERB  
Chuck Shafer, IT-Richland  
Dennis Robinson, IT-Martinez

**Mather Air Force Base  
Appendix D  
Deadlines for Draft Primary Documents**

In accordance with Section 8 of the Agreement, the following deadlines for submission of draft primary documents have been established as of January 19, 1994.

<u>AC&amp;W Site</u>	<u>Deadline</u>
Remedial Investigation Report	December 31, 1990
Feasibility Study Report	March 31, 1991
Proposed Plan	June 30, 1991
Record of Decision	December 31, 1991
Preliminary Design Investigation	February 28, 1992
<u>Group 2 Sites</u>	
Remedial Investigation Report	March 16, 1992
<u>Group 3 Sites</u>	
Technical Memorandum	May 10, 1993
Comprehensive Baseline Risk Assessment Work Plan (Addendum to Group 3 Sites Work Plan)	September 30, 1992
<u>Groundwater/Comprehensive Operable Unit</u>	
Additional Field Investigation Work Plan (also includes Soils OU sites)	June 9, 1992
Feasibility Study Work Plan	July 23, 1992
Additional Field Investigation Report (also includes Soils OU sites)	May 2, 1994
Comprehensive Baseline Risk Assessment	March 19, 1994
Focused Feasibility Study Report	June 4, 1994
Proposed Plan	October 8, 1994
Record of Decision	February 4, 1995

Mather Air Force Base  
Appendix D (cont'd)  
January 19, 1994

Soils Operable Unit

Feasibility Study Work Plan	July 23, 1992
Engineering Evaluation/Cost Assessment - Sludge removal at Site 20 - Bioventing at sites 29 & 32 - Free-product removal at Site 29	July 31, 1993
Focused Feasibility Study Report	June 4, 1994
Proposed Plan	October 8, 1994
Record of Decision	February 4, 1995

Landfill Operable Unit

Focused Feasibility Study Report	April 23, 1993
Proposed Plan	June 22, 1993
Record of Decision	February 14, 1994

1830203



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS AIR FORCE BASE DISPOSAL AGENCY



04 JAN 1994

REPLY TO

ATTN OF: AFBCA/OL-D  
10503 Kaydet Avenue  
Mather CA 95655

SUBJ: Proposed FFA Deadlines for Draft Primary Documents for  
the AC&W Remedial Action

TO: U.S. EPA, Attn: Brian Swarhout  
CA DTSC, Attn: Kent Strong

1. In accordance with Section 8.3 of the Federal Facility Agreement for Mather AFB, the Air Force is proposing the following deadlines for the completion of the draft primary documents for the remedial action (RA) at the AC&W Site.

Remedial Action Work Plan	4 Nov 93
Preliminary Engineering Report (includes Process & Instrumentation Diagrams)	29 Dec 93
Shop Drawings and Specifications	4 Feb 94

2. Please also note that the last Appendix D issued had dates for draft final documents for the Landfill OU, rather than for the draft documents. This will be corrected in the Appendix D that is issued to incorporate the dates agreed upon for the above AC&W RA documents.

3. Please provide any comments within 15 days of receipt. Questions should be addressed to Bill Hughes at (916) 364-4007.

CHARLES H. SMITH, PhD, P.E.  
Remedial Project Manager

cc: AFBCA/NW  
AFCEE/ESB  
U.S. EPA: Debbie Lowe  
RWQCB: Cam Williams



DEPARTMENT OF THE AIR FORCE  
 HEADQUARTERS AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE  
 BROOKS AIR FORCE BASE TEXAS

FROM: HQ AFCEE/ESB  
 8001 Inner Circle Dr Ste 2  
 Brooks AFB TX 78235-5328

20 OCT 1993

SUBJ: F41624-92-D-8005/0004, Aircraft Control & Warning (AC&W)  
 Site Remedial Action Deliverable Dates, Mather, CA

TO: AFBDA/OL-D/EM  
 10503 Kaydet Ave, Rm 2  
 Mather, CA 95655

The following deliverable dates should be presented to the Regulators for concurrence and inclusion in Appendix D of the Mather Federal Facilities Agreement. These are the only primary documents required for post Record of Decision activities.

Document	Submittal Date
Draft Remedial Action Workplan	19 Nov 93
Draft Process & Instrumentation Diagrams	3 Jan 94
Draft Shop Drawings and Specs	-2 Feb 94

If there are any questions, contact the undersigned at 210-536-5221.

KRAIG A. EVENSON, Capt, USAF  
 Team Chief, Base Closure  
 Restoration Division



**Mather Air Force Base  
Appendix D  
Deadlines for Draft Primary Documents**

In accordance with Section 8.1 of the Agreement, the following deadlines for submission of draft primary documents have been established as of September 15, 1993

<u>AC&amp;W Site</u>	<u>Deadline</u>
Remedial Investigation Report	December 31, 1990
Feasibility Study Report	March 31, 1991
Proposed Plan	June 30, 1991
Record of Decision	December 31, 1991
Preliminary Design Investigation	February 28, 1992
<u>Group 2 Sites</u>	
Remedial Investigation Report	March 16, 1992
<u>Group 3 Sites</u>	
Technical Memorandum	May 10, 1993
Comprehensive Baseline Risk Assessment Work Plan (Addendum to Group 3 Sites Work Plan)	September 30, 1992
<u>Groundwater/Comprehensive Operable Unit</u>	
Additional Field Investigation Work Plan (also includes Soils OU sites)	June 9, 1992
Feasibility Study Work Plan	July 23, 1992
Additional Field Investigation Report (also includes Soils OU sites)	May 2, 1994
Comprehensive Baseline Risk Assessment	March 19, 1994
Focused Feasibility Study Report	June 4, 1994
Proposed Plan	October 8, 1994
Record of Decision	February 4, 1995

Mather Air Force Base  
Appendix D (cont'd)  
September 15, 1993

Soils Operable Unit

Feasibility Study Work Plan	July 23, 1992
Engineering Evaluation/Cost Assessment	31 July 1993
- Sludge removal at Site 20	
- Bioventing at sites 29 & 32	
- Free-product removal at Site 29	
Focused Feasibility Study Report	June 4, 1994
Proposed Plan	October 8, 1994
Record of Decision	February 4, 1995

Landfill Operable Unit

DF Focused Feasibility Study Report	October 15, 1993
DF Proposed Plan	October 22, 1993
DF Record of Decision	January 15, 1994

**Mather Air Force Base  
Appendix D  
Deadlines for Draft Primary Documents**

In accordance with Section 8.1 of the Agreement, the following deadlines for submission of draft primary documents have been established as of July 1, 1993

<u>AC&amp;W Site</u>	<u>Deadline</u>
Remedial Investigation Report	December 31, 1990
Feasibility Study Report	March 31, 1991
Proposed Plan	June 30, 1991
Record of Decision	December 31, 1991
Preliminary Design Investigation	February 28, 1992
 <u>Group 2 Sites</u>	
Remedial Investigation Report	March 16, 1992
 <u>Group 3 Sites</u>	
Technical Memorandum	May 10, 1993
Comprehensive Risk Assessment Work Plan (Addendum to Group 3 Sites Work Plan)	September 30, 1992
 <u>Groundwater/Comprehensive Operable Unit</u>	
Additional Field Investigation Work Plan	June 9, 1992
Feasibility Study Work Plan	July 23, 1992
*Additional Field Investigations Report (also includes Soils OU sites)	May 2, 1994
*Comprehensive Baseline Risk Assessment	March 19, 1994
*Feasibility Study Report	June 4, 1994
*Proposed Plan	October 8, 1994
*Record of Decision	February 4, 1995



Mather Air Force Base  
Appendix D (con't)

Soils Operable Unit

Additional Field Investigation Work Plan	June 9, 1992
Feasibility Study Work Plan	July 23, 1992
*Engineering Evaluation/Cost Analysis	July 31, 1993
-Sludge removal at Site 20	
-Bioventing at Sites 29 & 32	
-Free product removal at Site 29	
*Focused Feasibility Study Report	June 4, 1994
*Proposed Plan	October 8, 1994
*Record of Decision	February 4, 1995

Landfill Operable Unit

Feasibility Study Work Plan	May 12, 1992
Feasibility Study Report	March 12, 1993
*Proposed Plan	June 21, 1993
*Record of Decision	November 15, 1993

**Mather Air Force Base  
Appendix D  
Deadlines for Draft Primary Documents**

In accordance with Section 8.1 of the Agreement, the following deadlines for submission of draft primary documents have been established as of July 1, 1993

<u>AC&amp;W Site</u>	<u>Deadline</u>
Remedial Investigation Report	December 31, 1990
Feasibility Study Report	March 31, 1991
Proposed Plan	June 30, 1991
Record of Decision	December 31, 1991
Preliminary Design Investigation	February 28, 1992
 <u>Group 2 Sites</u>	
Remedial Investigation Report	March 16, 1992
 <u>Group 3 Sites</u>	
Technical Memorandum	May 10, 1993
Comprehensive Risk Assessment Work Plan (Addendum to Group 3 Sites Work Plan)	September 30, 1992
 <u>Groundwater/Comprehensive Operable Unit</u>	
Additional Field Investigation Work Plan	June 9, 1992
Feasibility Study Work Plan	July 23, 1992
*Additional Field Investigations Report (also includes Soils OU sites)	May 2, 1994
*Comprehensive Baseline Risk Assessment	March 19, 1994
*Feasibility Study Report	June 4, 1994
*Proposed Plan	October 8, 1994
*Record of Decision	February 4, 1995

Mather Air Force Base  
Appendix D (con't)

Soils Operable Unit

Additional Field Investigation Work Plan	June 9, 1992
Feasibility Study Work Plan	July 23, 1992
*Engineering Evaluation/Cost Analysis	July 31, 1993
-Sludge removal at Site 20	
-Bioventing at Sites 29 & 32	
-Free product removal at Site 29	
*Focused Feasibility Study Report	June 4, 1994
*Proposed Plan	October 8, 1994
*Record of Decision	February 4, 1995

Landfill Operable Unit

Feasibility Study Work Plan	May 12, 1992
Feasibility Study Report	March 12, 1993
*Proposed Plan	June 21, 1993
*Record of Decision	November 15, 1993

## APPENDIX D

## DEADLINES FOR DRAFT PRIMARY DOCUMENTS

In accordance with Section 8.1 of this Agreement, the following deadlines for submission of draft primary documents have been established as of May 11, 1992:

<u>AC&amp;W Site:</u>	<u>Deadline</u>
Remedial Investigation Report	December 31, 1990
Feasibility Study Report	March 31, 1991
Proposed Plan	June 30, 1991
Record of Decision	December 31, 1991
Preliminary Design Investigation	February 28, 1992
 <u>Group 2 Sites</u>	
Remedial Investigation Report	March 16, 1992
 <u>Group 3 Sites</u>	
Remedial Investigation Report	May 10, 1993
Comprehensive Risk Assessment Work Plan (Addendum to Group 3 Sites Work Plan)	September 30, 1992
 <u>Groundwater/Comprehensive Operable Unit</u>	
Additional Field Investigation Work Plan	June 9, 1992
Feasibility Study Work Plan	July 23, 1992
Feasibility Study Report	June 2, 1993
Proposed Plan	June 17, 1993
Record of Decision	December 8, 1993

Soils Operable Unit

Additional Field Investigation Work Plan	June 9, 1992
Feasibility Study Work Plan	July 23, 1992
Feasibility Study Report	June 2, 1993
Proposed Plan	June 17, 1993
Record of Decision	December 8, 1993

Landfill Operable Unit

Feasibility Study Work Plan	May 12, 1992
Feasibility Study Report	March 12, 1993
Proposed Plan	March 12, 1993
Record of Decision	July 30, 1993

## APPENDIX D

## DEADLINES FOR DRAFT FINAL PRIMARY DOCUMENTS

In accordance with Section 8.1 of this Agreement, the following deadlines for submission of draft primary documents have been established as of March 11, 1992:

<u>AC&amp;W Site:</u>	<u>Deadline</u>
Remedial Investigation Report	December 31, 1990
Feasibility Study Report	March 31, 1991
Proposed Plan	June 30, 1991
Record of Decision	December 31, 1991
Preliminary Design Investigation	February 28, 1992
 <u>Group 2 Sites</u>	
Remedial Investigation Report	March 16, 1992
 <u>Group 3 Sites</u>	
Remedial Investigation Report	May 10, 1993
Comprehensive Risk Assessment Work Plan (Addendum to Group 3 Sites Work Plan)	July 23, 1992
 <u>Groundwater/Comprehensive Operable Unit</u>	
Feasibility Study Work Plan	May 21, 1992
Feasibility Study Report	June 2, 1993
Proposed Plan	June 17, 1993
Record of Decision	December 8, 1993

Soils Operable Unit

Feasibility Study Work Plan	May 21, 1992
Feasibility Study Report	June 2, 1993
Proposed Plan	June 17, 1993
Record of Decision	December 8, 1993

Landfill Operable Unit

Feasibility Study Work Plan	May 12, 1992
Feasibility Study Report	March 12, 1993
Proposed Plan	March 12, 1993
Record of Decision	July 30, 1993

1830215

R



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS AIR TRAINING COMMAND  
RANDOLPH AIR FORCE BASE, TX 78150

06 JUN 1991

Ms Katherine L. Moore  
United States Environmental Protection Agency  
Region IX  
Attn: H-7-3  
75 Hawthorne Street  
San Francisco CA 94105

Dear Ms Moore

We have revised the Federal Facility Agreement schedule of primary documents, as requested in your letter of 29 May 1991. The dates for the Draft Proposed Plan documents on the Group 2 and Group 3 sites have been revised to indicate delivery with the corresponding Feasibility Study Reports. You will find these changes reflected in the new Appendix D attached to this letter.

The document to be produced as a result of this summer's investigations at the AC&W Site will be called a "Remedial Design Preliminary Investigation." This is also reflected in the attachment. We hesitate to call it a "Design Report" because it will not include any specific design information. If this name is not acceptable, let us know. This item is an agenda topic at the next FFA Project Managers' meeting.

The issue of a Comprehensive ROD for Mather AFB is being worked through the Air Force Judge Advocate (JA) channels. This is an issue applicable to all NPL bases in Region IX, so the Air Training Command JA (Environmental), Lt Col Jim Pigg, will work with Lt Col Ray Swensen to develop boilerplate language. This will ensure consistency among all the Air Force FFAs.

We hope these schedules are satisfactory. Please contact the undersigned at (512) 652-3240 or Dr Dee Ann Sanders at (512) 652-3302 if you have any questions.

Sincerely

A handwritten signature in cursive script that reads "Daniel L. Sizemore".

DANIEL L. SIZEMORE, Lt Col, USAF  
Chief, Envmtl Planning Div  
Directorate of Facilities Projects  
DCS/Engineering and Services

1 Atch  
Revised FFA Appx D

cc: ATC/JAD  
HQ USAF/CEV  
AFESC/BC  
323 ABG/EM  
Ca DHS (Ms Billington)  
Ca RWQCB (Mr Mosbacher)



## APPENDIX D

## DEADLINES FOR DRAFT FINAL PRIMARY DOCUMENTS

In accordance with Section 8.1 of this Agreement, the following deadlines for submission of draft primary documents have been established as of June 3, 1991:

<u>AC&amp;W Site:</u>	<u>Deadline</u>
Remedial Investigation Report	December 31, 1990
Feasibility Study Report	March 31, 1991
Proposed Plan	June 30, 1991
RD Preliminary Investigation	December 17, 1991
Record of Decision	December 31, 1991
 <u>Group 2 Sites'</u>	
Remedial Investigation Report	February 28, 1992
Feasibility Study Report	June 30, 1992
Proposed Plan	June 30, 1992
Record of Decision	March 31, 1993
 <u>Group 3 Sites</u>	
Sampling and Analysis Plan	July 26, 1991
Quality Assurance Project Plan	July 26, 1991
Remedial Investigation/Feasibility Study Report	November 17, 1992
Proposed Plan	November 17, 1992
Record of Decision	December 12, 1993



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, CA 94105

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January 18, 1990

Jose L. Saenz, Lt Col, USAF  
Chief, Environmental Planning Division  
Headquarters Air Training Command  
Randolph Air Force Base, TX 78150

Dear Lt Col Saenz:

The U.S. Environmental Protection Agency (EPA) received, on 8 January 1990, your 15 December 1989 letter proposing dates for the delivery of draft Primary Documents delineated in Section 8 (Deadlines) of the Federal Facility Agreement Under CERCLA Section 120 for Mather AFB. The EPA approves the negotiated schedule, listed below, and believes that it provides the Air Force with sufficient time to conduct a very thorough Remedial Investigation and Feasibility Study at Mather.

	<u>DEADLINES</u>	
	<u>AC&amp;W Sites</u>	<u>Group 2 Sites</u>
RI Report	December 1, 1990	February 1, 1992
FS Report	March 1, 1991	June 1, 1992
Proposed Plan	June 1, 1991	September 1, 1992
RCD	December 1, 1991	March 1, 1993

EPA recognizes these dates as enforceable dates for the submittal of the draft Primary Documents listed.

Please contact me at 415-768-1354 or John Chesnutt at 415-664-6631 if you have any questions regarding this letter.

Sincerely,

John Kemmerer  
Acting Chief  
Federal Enforcement Section

cc: Lt Col Richard A. Blank, USAF  
Tracie Billington, DHS  
Bob Matteoli, CRWQCB CVR

**DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM  
REGION 1**

10151 CROYDON WAY  
SACRAMENTO, CA 95827-2106  
(916) 855-7700



January 8, 1990

Richard A. Blank, Lt. Col., USAF  
Chief Environmental Office  
323 FTW/EM  
Mather AFB, CA 95565-5000

Dear Lt. Col. Blank:

**APPROVAL OF ENFORCEABLE SCHEDULE, MATHER AFB FEDERAL FACILITY AGREEMENT**

The Department of Health Services (Department), the U. S. Environmental Protection Agency, and the Air Force have been negotiating an enforceable schedule for the submittal of primary documents, pursuant to the Federal Facility Agreement (FFA) for Mather AFB. On 15 December 1989, Headquarters-Air Training Command telefaxed to the Department a proposed enforceable schedule. That schedule is as follows:

	AC&W SITE DUE DATE	GROUP 2 SITES DUE DATE
RI REPORT	December 1990	February 1992
FS REPORT	March 1991	June 1992
PROPOSED PLAN	June 1991	September 1992
ROD	December 1991	March 1993

The Department has reviewed that schedule and will accept it as the enforceable schedule for the Mather AFB FFA. Based upon the existing information and the proposed RI/FS activities, the Department feels that the above-listed schedule allows ample time for completion of the RI/FS for the AC&W and Group 2 Sites.

If you should have any questions or comments regarding this matter, please contact Tracie Billington at (916) 855-7873.

Sincerely,

Anthony J. Landis, P.E.  
Chief, Site Mitigation Unit  
Region 1

cc: See next page.

Richard A. Blank, Lt. Col.  
Page 2

cc: Jose Saenz, Lt. Col. HQ-ATC  
Environmental and Contract Planning  
Headquarters Air Training Command  
Randolph Air Force Base, TX 78150-5001

Mike Mosbacher  
Regional Water Quality Control Board  
Central Valley Region  
3443 Routier Road  
Sacramento, CA 95827-3098

John Chestnutt  
US Environmental Protection Agency  
Region IX  
215 Fremont Street (H-7-3)  
San Francisco, CA 94105

1830220



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street  
San Francisco, Ca. 94105

10 OCT RECD

CERTIFIED MAIL NO. P 057 506 808  
RETURN RECEIPT REQUESTED

October 6, 1989

Richard A. Blank, Lt Col, USAF  
Environmental Management Office  
323rd Flying Training Wing  
Mather AFB, CA 95655-5000

Dear Lt Col Blank:

Pursuant to the terms of Section 36 (Effective Date and Public Comment) within the Federal Facility Agreement (FFA) under CERCLA Section 120 for Mather AFB signed July 21, 1989, the FFA is hereby declared effective on the date of your receipt of this letter.

During the October 3, 1989 Technical Review Committee meeting held at Mather AFB, representatives of the U.S. Air Force, the California Department of Health Services, and EPA agreed to make the FFA effective in its present form, as no public comment was received concerning the document.

Pursuant to FFA Section 8 (Deadlines), the Air Force has twenty-one (21) days from the effective date to propose deadlines for the completion of the draft primary documents delineated in Section 8.

In addition, pursuant to the FFA Section 18 (Project Managers) EPA is hereby notifying all Parties that the EPA Project Manager is John Chesnutt. The alternate Project Manager is Roberta Blank. Pursuant to FFA Section 21 (Notification), all documents or submittals to EPA shall be addressed as follows:

Mr. John Chesnutt  
Remedial Project Manager (H-7-3)  
U.S. Environmental Protection Agency  
Region 9  
Hazardous Waste Management Division  
215 Fremont Street  
San Francisco, CA 94105

If you have any questions regarding this letter, please contact John Chesnutt at 415-974-8940.

Sincerely,

A handwritten signature in cursive script that reads "Julie Anderson".

Julie Anderson  
Chief, Federal Enforcement Section

cc: Lt Col Jose L. Saenz, HQ ATC  
Tracie Billington, DHS  
Bob Matteoli, CRWQCB CVR

## ATTACHMENT B

## TOXICITY OF SIGNIFICANT SUBSTANCES FOUND AT MATHER AIR FORCE BASE

This description of the toxicity of chemicals of concern at Mather AFB is for reference only and should not be interpreted as describing effects on any individual person.

## Benzene

Acute: Central Nervous System (CNS) depression (headache, dizziness, drowsiness and nausea)  
 Chronic: Suppression of blood cells, leukopenia (a reduction of leukocytes); anemia and thrombocytopenia (decrease in blood platelets)

## Carbon tetrachloride

Acute: drowsiness, dizziness, incoordination and mental confusion; nausea, vomiting, diarrhea and abdominal pain; delayed effects of damage to the heart, liver and kidneys  
 Chronic: damage to the liver and kidneys; Parkinsonism (chronic nervous disease marked by tremors)

## Chloroform

Acute: CNS depression (headache, drowsiness, vomiting, dizziness); liver and kidney damage; skin and eye irritation  
 Chronic: liver and kidney damage

## 1,2 - Dichloroethane

Acute: nausea, vomiting, mental confusion, dizziness and pulmonary edema; eye and skin irritation  
 Chronic: loss of appetite, nausea, vomiting, stomach pain, CNS changes, liver and kidney damage

## 1,2 - Dichloroethene

Acute: nausea, vomiting, dizziness and narcosis; skin and mucous membrane irritation  
 Chronic: no human data, animal data weak; may cause damage to liver, lung and blood cells

## Phenol

Acute: severe skin and eye damage; palor, weakness, sweating, headache, ringing of ears, cyanosis, shock, excitement, frothing of the nose and mouth  
 Chronic: loss of appetite, vomiting, excessive salivation, headache, dizziness, and skin eruption; liver and kidney damage

## Tetrachloroethylene (PCE)

Acute: nausea, vomiting, headache, dizziness, drowsiness and tremors; eye and skin irritation  
 Chronic: headache, fatigue and dizziness; liver and kidney damage

**Toluene**

Acute: CNS depression (headache, dizziness, fatigue, muscle weakness); eye and skin irritation

Chronic: no known adverse, long-term effects

**Trichloroethylene (TCE)**

Acute: CNS depression (headache, dizziness, vertigo, tremors, irregular heartbeat, fatigue, nausea, vomiting, blurred vision); skin and eye irritation

Chronic: liver and kidney damage, CNS depression

**1,1,2 - Trichloroethane**

Acute: CNS depression; eye and nose irritation

Chronic: CNS depression; liver and kidney damage

**Vinyl Chloride**

Acute: headache, dizziness, abdominal pain, numbness and tingling of the extremities; skin and eye irritation

Chronic: liver damage; enlargement of the spleen, decreased blood platelets; nerve damage; decreased pulmonary function

**Xylene**

Acute: CNS depression (dizziness, drowsiness, nausea, vomiting, abdominal pain and loss of appetite); breathing xylene vapors or aspiration of a few milliliters may cause pulmonary edema; damage to liver and kidney; skin and eye irritation

Chronic: headache, irritability, fatigue, digestive disorders and sleep disorders; tremors; impaired memory, weakness, vertigo, loss of appetite; damage to liver and kidneys

Reference: Arthur D. Little, Inc., 1987, The Installation Restoration Program Toxicology Guide, Harry G. Armstrong Aerospace Medical Research Laboratory, Wright-Patterson AFB, Ohio.

ATTACHMENT C  
STATEMENT OF FACTS

For the purposes of this Agreement the following constitutes a summary of the facts upon which this Agreement is based. None of the facts related herein shall be considered admissions by any Party, nor shall they be used by any person for purposes unrelated to this Agreement.

A. Mather Air Force Base (Mather) is located approximately 12 miles east-southeast of downtown Sacramento, in Sacramento County, California. Mather covers approximately 5,715 contiguous acres. Mather was established in 1918 as a flight training school. The base was inactivated in June 1922, then reactivated for a short period of time between March 1930 and November 1932. Mather was not involved in continuous military action again until World War II. The base was reactivated in 1941 and rebuilt as a school for pilot and navigator training. In 1959, major construction began to add a Strategic Air Command (SAC) mission to Mather AFB. SAC activities increased the generation of hazardous waste due to expanded maintenance requirements for the larger SAC aircraft. Mather is presently used for navigator training. A map of the facility is attached to this Agreement (Attachment A).

B. Since 1918, generation of hazardous substances at Mather has resulted primarily from industrial operations, fire protection training, and fuels management. Major industrial operations have included vehicle maintenance, plating and cleaning, aircraft maintenance and corrosion control, pneumatic and hydraulic equipment repair, aircraft ground equipment inspection and repair, and special weapons maintenance. These processes have generated varying quantities of waste oils, fuels, solvents and cleaners.

C. As part of the Department of Defense's Installation Restoration Program (IRP)(See Attachment E, IRP Activities), the Air Force has identified 34 disposal or spill sites at Mather AFB. These sites are shown on the map in Attachment A. Disposal of solid waste, mainly municipal-type refuse, occurred in seven landfills (sites LF-01 through LF-07). These landfills were used for varying periods of time from pre-1942 through 1974, and probably received industrial waste oils and solvents. Three chemical disposal areas (sites WP-01 through WP-03) were used for disposal of bulk chemical wastes, primarily solvents, paints, oils, and fuel sludges, during the 1950's and 1960's. Fuel and other combustible chemical wastes were incinerated during fire training exercises conducted in four fire training areas (sites FT-01 through FT-04) from the early 1940's through the early 1980's. Other suspected waste disposal sites include three drainage ditches (sites DD-01 through DD-03), an electron tube burial site (site LL-01), a septic tank (site WT-01), two asphalt rubble disposal areas (sites OT-01 and OT-02), and a portion of the sanitary sewer system in the industrial area of the base (site OT-03).



D. In addition, major fuel spills and leaks have occurred in various locations on base, including 12 sites (Sites SS-01 through SS-11 and LU-04) identified under the IRP at Mather. Site SS-01 resulted from a leak in a gasoline tank during 1982; the amount of gasoline lost was estimated to be 700 gallons. Most of the additional sites are fuel spills and leaks discovered during concurrent investigations to identify and remove leaking or abandoned underground fuel storage tanks. The tanks were not known to leak before their removal; therefore, dates and amounts of fuel lost are unknown.

E. Various hazardous wastes including TCE, transformer oil, paints, and used motor oils were disposed and have contributed to identifiable ground water contamination in an area of Mather Air Force Base known as the AC&W site (site WP-02). This area is located northeast of the main base housing area.

F. Mather is situated in the southeastern portion of the Sacramento River Valley, in the northern half of a region described geologically as the Great Central Valley Physiographic Province. The beneficial uses of the groundwater in this area include: (a) private domestic supply, (b) municipal and industrial supply, and (c) agricultural supply. The groundwater basin in the vicinity of Mather consists of an aquifer with numerous water bearing zones including unconfined water producing intervals. An intermittent perched zone exists discontinuously in some areas. Regional groundwater flow is generally to the southwest.

G. Mather receives its on-base water supply from the groundwater basin described in paragraph F via a system of 10 production wells of varying depths. Approximately 150 residents of areas immediately west and south of Mather AFB receive their water supply from the groundwater basin via private water supply wells, drawing water from the shallower confines (less than 250' below land surface) of the groundwater aquifer. The remaining residents of the communities surrounding Mather receive their water from the groundwater basin via municipal supply wells drawing water primarily from the lower extremes (depths greater than 250' below land surface) of the groundwater aquifer.

H. Beginning in 1981, the California Regional Water Quality Control Board, Central Valley Region, has intermittently sampled wellwater from 16 private shallow wells immediately west of Mather. As of mid-1988, 10 of these wells have shown contamination with trichloroethylene (TCE) or carbon tetrachloride. As a result, the Air Force assumed the responsibility of arranging potable water supplies for the population whose wells have shown TCE or carbon tetrachloride contamination.

I. The Aircraft Control and Warning (AC&W) Site at Mather was placed on EPA's National Priority List (NPL) of Superfund sites on July 22, 1987, 52 Federal Register 26620. The listing was updated on July 14, 1989, 54 Federal Register 29820, proposing inclusion of the entire base on the NPL due to hazardous substance contamination, including contamination of a potable groundwater aquifer system.

## ATTACHMENT D

LIST OF FINAL PRIMARY DOCUMENTS  
AND DOCUMENTS UNDER REVIEW

As of the date of execution of this Agreement:

1. There are no final primary documents relating to Mather AFB which are applicable for this Attachment; and
2. As described in Appendix A, the following primary documents have been submitted by the Air Force to EPA and the State and are currently under review:
  - a. RI/FS Work Plan for AC&W site, including Sampling and Analysis Plan
  - b. Quality Assurance Project Plan (QAPP) for AC&W site
  - c. Community Relations Plan

Atc D

## ATTACHMENT E

## INSTALLATION RESTORATION PROGRAM ACTIVITIES

For the purposes of this Agreement, the following constitutes a summary of the background of the Installation Restoration Program (IRP) activities which have been conducted at Mather AFB prior to the effective date of this Agreement. None of the activities related herein shall be considered admissions by any Party, nor shall they be used by any person for purposes unrelated to this Agreement.

The Air Force has conducted IRP activities to evaluate the past hazardous waste site areas at Mather AFB and to determine methods for controlling migration of hazardous contaminants from these areas. The IRP has been developed as a four-phase program: Phase I - Records Search; Phase II - Confirmation and Quantification (Remedial Investigation); Phase III - Technology Base Development; and Phase IV - Corrective Action.

A. Mather IRP Phase I - Installation Records Search (CH<sub>2</sub>M Hill, Feb - June 1982).

A base survey, records search, and interviews were conducted in order to evaluate facility waste disposal sites and practices. The principal findings were:

- 23 past disposal or spill sites were identified and prioritized for future investigation.
- Records were identified that strongly suggested the presence of low levels of TCE in several base wells.
- Regional Water Quality Control Board, Central Valley Region records indicated that TCE contamination had been detected in several off base, private, drinking water wells since 1979.
- Previous uncontrolled disposal of waste solvents at the AC&W site pose a significant potential for contamination of base housing area wells.
- The 7100 Area site was a principal disposal site for all types of waste and is a potential source of contamination migrating off base.
- The location and history of the West Ditch site indicated that it is a potential source of contamination found in off base wells west of Mather.

The Phase I study made the following recommendations for Phase II investigations to verify the presence and quantity of contamination at several sites including:

- Begin a groundwater monitoring program at the highest priority sites based on the California action levels for contaminants of concern.
- Install three monitoring wells at the West Ditch.
- Install four monitoring wells around the 7100 Area.
- At the AC&W Area: investigate the condition of the AC&W well, perform a search for the disposal pipe, and install four groundwater monitoring wells.
- Install background monitoring wells in the Northeast and East perimeter areas.

B. Mather IRP Phase II, Stage 1 - Confirmation and Quantification studies. (Roy F. Weston, March 1984)

Confirmation and quantification studies of the highest rated sites from the Phase 1 (the AC&W, West Ditch, 7100 Area, Northeast Perimeter, and background or upgradient areas) were conducted as follows:

- Installation of 11 groundwater monitor wells. Three at the AC&W & 7100 Areas; two along the West ditch and in the Northeast Perimeter areas; and one background well northeast of the Main Base area.
- Several rounds of monitor well sampling and water level measurements.
- Sediment sampling along the West Ditch.
- Sampling of the base production wells.
- Simple drawdown pump tests of some monitor wells.

The principal findings were:

- AC&W Site - TCE was detected above state action levels in all monitoring wells and in the AC&W production well. Low levels of other volatile organic compounds were detected in some wells.
- 7100 Area - TCE was detected in all wells and was above state action levels in two wells. Additionally high levels of dissolved solids were found in groundwater near this site.
- West Ditch - TCE and other volatile organics were found below state action levels in groundwater. Analysis of sediments found only low levels of 1,4-dichlorobenzene.
- Concentrations of 1,1,1-trichloroethane and toluene were found in wells below state action levels.

Weston made the following recommendations for future investigations:

- Initiate long-term monitoring of all on-base wells.
- Perform a hydrogeologic evaluation of Mather.
- Conduct soil gas monitoring and soil sampling in the AC&W area.
- Install additional wells at each of the three principal sites: AC&W, West Ditch, and 7100 area.
- Perform surface geophysical monitoring in the AC&W and 7100 Areas.
- Establish a cap over the landfill in the 7100 Area.

C. IRP Phase II, Stage 2 - Additional Confirmation and Quantification. (Aerovironment, Sept 1985)

Confirmation and quantification studies of fifteen sites identified in Phase 1 which were not investigated during Stage 1 (Runway Overrun Landfill; 8150 Area Landfill; Northeast Perimeter Area Landfills 1,2, & 3; Firing Range Landfill; Fire Training Areas 1,3, & 4; Drainage Ditches 1 & 2; Weapons Storage Area septic system; Old Burial Site; Fuel Tank Sludge Burial Site; and MOGAS spill site) were conducted. Activities included the installation of 29 shallow groundwater monitor wells, soil sampling at two sites, and surface geophysical studies at eight sites. The principal findings were:

- Runway Overrun Landfill - Tetrachloroethylene (PCE) above state action levels, and low levels of TCE, 1,2-dichloropropane, and Dichloroethene (DCE).
- Northeast Perimeter Landfill 1 - PCE over state action levels in three wells.
- Northeast Perimeter Landfill 2 - PCE and DCE over state action levels in three wells.
- Northeast Perimeter Landfill 3 - PCE and DCE below state action levels.
- Fire Training Area 1 - PCE over action level, TCE and DCE below state action levels.
- Fire Training Area 3 - TCE below state action level.
- Drainage Ditch 1 - TCE, PCE, and DCE below state action levels.
- Drainage Ditch 2 - TCE over state action level.
- Old Burial Site - TCE more than ten times the state action level.

Aerovironment made the following recommendations for additional work: Installation of 13 additional monitor wells; soil borings and surface geophysics at selected sites; source characterization; performing site risk assessments; and aquifer pump/evaluation testing. Aerovironment recommended no further actions for the following sites: 8150 Area Landfill, Firing Range Landfill, Fire Training Area 4, Weapons Area Septic System, Fuel Tank Sludge Burial Site, and MOGAS spill site.

D. IRP Phase II, Stage 3 - Final Confirmation and Quantification Investigation. (Aerovironment 1986)

The purpose of the study was to perform work recommended by the Phase II, Stage 1 report. An additional 36 groundwater monitor wells were drilled at the following sites: Northeast Perimeter Landfill 2, 7100 Area, AC&W Area, Drainage Ditch 2, Jet Engine Test Cell (not previously identified as a site), and the West Ditch. Surface geophysical tests and soil gas surveys were performed at several sites. The principal findings were:

- 7100 Area - This area was confirmed as a source of TCE and PCE contamination in groundwater which has migrated off base.
- AC&W Site - TCE contamination was confirmed above state action levels more than 2000' downgradient from the site in shallow wells. Benzene and xylene contamination at low levels was found in deep wells near the site.
- West Ditch - TCE and PCE, above state action levels, was confirmed in several shallow wells and one deep well. The source of contamination in this area was not located.
- Monitor wells installed in background areas were found to be free of contamination.

Final recommendations from Aerovironment included: drilling additional shallow wells in the 7100, West Ditch, and AC&W areas; establishment of a semi-annual monitor well sampling program; additional sampling of some wells to confirm suspected contaminants from nonrepeated sampling rounds; and an inventory of all private wells within a one mile radius of the base.

E. Hydrogeologic Investigation and Evaluation. (U.S. Geological Survey (USGS) and International Technology Corporation (ITC), Feb 1988)

This investigation compiled data from all existing wells on Mather and within a two mile radius outside the base. The USGS reviewed the entire body of published geologic information from the Central Valley Region of California. Additional tasks included surveying the elevation of all base monitor wells. This study resulted in the following:

- A basewide potentiometric surface map.
- A series of 10 geologic cross-sections covering the entire base.
- A refined understanding of the area geology and aquifer system.
- Accurate land surface elevations and survey points for producing various hydrogeologic maps.

F. Solid Waste Assessment Testing for Air. (ITC, Mar-Apr 1988)

The purpose of this test is to assess air emissions from former waste disposal sites as required by the Calderon Bill (AB3374; State of California, 1986). The presence and rate of landfill gas emitted by eight former solid waste disposal sites were assessed. During this study, 18 gas characterization and 30 gas migration probes were permanently installed, sampled, and analyzed.

This survey identified the following three sites with landfill gas being emitted from them: Landfill 6; 7100 Area; and the 8150 landfill. Several other sites were identified as having small amounts of chlorinated organics in the emitted landfill gas.

G. Underground Storage Tank Removal Program.

Mather has an ongoing program to identify and remove underground storage tanks (USTs) that are abandoned, have failed tightness testing, or are no longer needed. To date, these efforts have resulted in the removal of over 60 USTs at Mather. During tank removal, soil testing is performed at each site to assess contamination from tank leaks, overfills, or pipe failures. Former tank sites which require extensive remediation or may affect groundwater are added to the IRP site list to be further investigated as part of the Remedial Investigation (RI) program. Eleven sites have been added to the RI as a direct result of this program.

H. Well Redevelopment and Sampling Program. (ITC, Aug-Nov 1988)

Since it had been over two years since any of Mather's 75 monitor wells had been sampled, and since water levels had dropped considerably, it was felt that the wells needed redevelopment before sampling. The redevelopment also verified the construction details of each well and identified any damaged wells. The well redevelopment identified eleven damaged wells which will be further evaluated to determine if they should be repaired or abandoned.

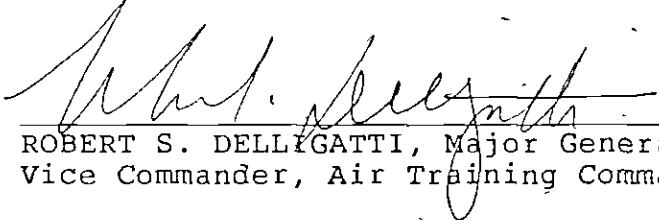
The remaining 64 non-damaged wells were sampled after redevelopment and analyzed for the same parameters. This represented the first and only time that all of Mather's wells were sampled at the once. Contamination (primarily TCE and/or PCE) was detected over state action levels in the following areas: AC&W, West Ditch, 7100 Area, and the Northeast Perimeter Area landfills. These results are very similar to those in the three Phase II reports.

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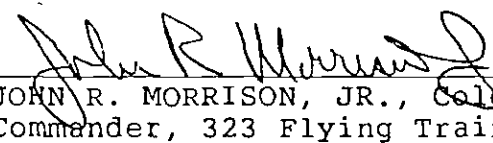
121 JUL 1989

IT IS SO AGREED:

UNITED STATES AIR FORCE


BY:   
ROBERT S. DELLYGATTI, Major General, USAF  
Vice Commander, Air Training Command

20 July 89  
DATE

BY:   
JOHN R. MORRISON, JR., Colonel, USAF  
Commander, 323 Flying Training Wing

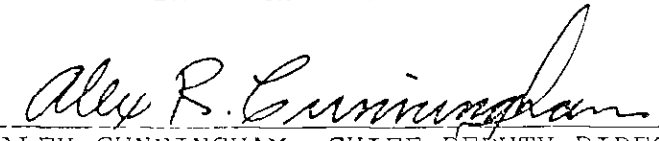
21 Jul 89  
DATE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BY:   
DANIEL W. MCGOVERN  
Regional Administrator, Region IX  
U. S. Environmental Protection Agency

7/21/89  
DATE

CALIFORNIA DEPARTMENT OF HEALTH SERVICES

BY:   
ALEX CUNNINGHAM, CHIEF DEPUTY DIRECTOR  
Toxic Substances Control Division

21 July 89  
DATE



**FINAL PAGE**

**ADMINISTRATIVE RECORD**

**FINAL PAGE**