

# Responsiveness Summary

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## First Public Comment Period

The Air Force used the *North/East/West Industrial Operable Unit, Travis Air Force Base, Proposed Plan for Soil, Sediment, and Surface Water* (Travis AFB, 1998a); the *West/Annexes/Basewide Operable Unit, Travis Air Force Base, Proposed Plan for Soil Cleanup* (Travis AFB, 1998c); and the 8 July to 8 August 1998 public comment period to promote public input on the basewide soil remediation approach. The public received these Proposed Plans just prior to the start of the public comment period. To encourage public comment, the Air Force listed the phone numbers and e-mail addresses of Air Force and California Environmental Protection Agency Department of Toxic Substances Control (Cal-EPA/DTSC) representatives in the Proposed Plans; mailed more than 1,300 copies of the Proposed Plans to interested community members; distributed copies of the Proposed Plans to local libraries; and held a public meeting on 23 July 1998 at the Fairfield Senior Center.

Several community members attended the public meeting, and the Air Force received oral comments from several people, including Mr. Jim Whalen, Mr. David Kanouff, and Mr. Jon Weiss; all of these individuals were members of the Travis Air Force Base (AFB or Base) Restoration Advisory Board at the time of the public comment period. Mr. Rick Abbott submitted a comment on the basewide soil remediation approach to the Air Force during the public comment period. A written transcript of the public meeting contains the oral comments and is available for public review at the Travis AFB Information Repository, located at the Vacaville Public Library. The oral comments concerning the cleanup of contaminated soil at Travis AFB are presented below in a paraphrased form for greater clarity. The Air Force based the selection of soil remedial actions in the North/East/West Industrial Operable Unit (NEWIOU) on the documents in the Travis AFB Administrative Record and on public comments.

**Public Comment 1 from Mr. Jim Whalen: There was concern whether the Corrective Action Management Unit (CAMU) proposal had accounted for the synergistic effect of multiple chemicals in the soil within the CAMU.**

*Air Force Response:* The NEWIOU Soil, Sediment, and Surface Water Record of Decision will present a detailed chemical analysis of the material proposed for placement in the CAMU. This analysis will show that the soil contaminants placed in the CAMU are compatible with the existing waste and with each other. This analysis is necessary in order to meet the criteria found in the federal and California CAMU regulations.

*Air Force Response Update:* After the first Proposed Plan public meeting was held in 1998, the Air Force published the *Corrective Action Management Unit Soil Acceptance Criteria Technical Memorandum* (Radian, 2001). This technical memorandum presents the chemical analyses that support the placement of material from all NEWIOU and WABOU soil restoration sites into the CAMU.

**Public Comment 2 from Mr. David Kanouff: There was concern that the soil contaminants that do not readily decompose through natural attenuation, such as polychlorinated biphenyls (PCBs) and pesticides, will contaminate the local groundwater beneath the CAMU.**

*Air Force Response:* There are three considerations that alleviate this concern. First, the design of the CAMU will specify that there will be a 5-foot separation between the contaminated soil from other soil sites and the water table. This will ensure that the consolidated soil sits above the water table and is not in physical contact with the groundwater. Second, the CAMU cap above the contaminated soil is a low-permeability barrier that significantly reduces the amount of rainwater that would flow through the soil and transport contaminants to the local groundwater. Finally, contaminants such as PCBs, pesticides, and metals are relatively immobile. Most of the mobile contaminants have either volatilized into the atmosphere or dissolved into the local groundwater. The remaining contaminants are suitable for placement into the CAMU, because they are relatively immobile. To support this conclusion, the leachability assessment demonstrated that the consolidated soil would not adversely impact groundwater. The low-permeability cap constructed above this soil will increase this immobility, because there will be much less rainwater infiltration through the contaminated soil than that which occurs today.

**Public Comment 3 from Mr. Jon Weiss: Has Travis AFB established target levels for the contaminated materials proposed for the CAMU that are acceptable to the regulatory agencies and to the Air Force?**

*Air Force Response:* The regulatory agencies received and reviewed the proposed contaminant target (or acceptance) levels based on computer modeling and other supporting rationale in a document known as the *Corrective Action Management Unit Soil Acceptance Criteria* Technical Memorandum (Radian, 2001). The Air Force and regulatory agencies will finalize these levels in the NEWIOU Soil, Sediment, and Surface Water ROD. One source of supporting rationale is the leachability assessment, which demonstrated that the target levels for the consolidated soil do not pose a potentially adverse impact to groundwater.

*Air Force Response Update:* After the first Proposed Plan public meeting was held in 1998, the Air Force and the regulatory agencies finalized the CAMU soil acceptance levels in Table II-5-9 of the WABOU Soil ROD (Travis AFB, 2002a).

*U.S. EPA Response:* The State is the lead regulatory agency for landfill closures and for the CAMU. The CAMU proposal for Travis AFB will be going through a review process to demonstrate that the synergistic effects and persistence of chemicals will not create an environmental problem. Modeling and calculations that support this proposal will be presented to the public.

**Public Comment 4 from Mr. Rick Abbott: Has Travis AFB considered the use of Supercritical Oxidation Steam, a treatment technology used by the Texas Heavy Oil Recovery Company, to break down the soil contaminants?**

*Air Force Response:* The WABOU Feasibility Study (FS) (CH2M HILL, 1998a) evaluated a large number of potential soil treatment technologies for use at the WABOU soil sites. The FS considered a technology known as Steam Stripping/Metal Extraction to be an effective method of removing organic compounds and heavy metals from soil. However, this technology was

rejected due to its extensive equipment, labor, and energy requirements and the associated high capital and maintenance costs. If this technology can be shown to remediate contaminated soil in a cost-effective manner, then the Air Force will consider it for future soil remediation projects. The Air Force Center for Environmental Excellence (AFCEE) supports the evaluations of innovative technologies and provides opportunities for small businesses to assist in remediation projects. Travis AFB gave Mr. Abbott information to assist him in contacting AFCEE.

## Second Public Comment Period

In January 2006, Travis AFB printed a fact sheet that described significant changes to the soil remedial actions at 12 of the 18 NEWIOU sites. The 12 sites are Fire Training Area 1 (FT002); Sludge Disposal Site (OT010); Solvent Spill Area, Facilities 550/552, and 1832 (SS015); Oil Spill Area, Facilities 11, 13/14,20, 42/1941, 139/144, and sections of Storm Sewer Right-of-Way (SS016); Oxidation Pond Site (WP017); MW-329 Area (SS029); MW-269 Area (SS030); MW-107, and MW-246 (ST032); Facility 811 (SD034); Facilities 818 and 819 (SS035); Facilities 872, 873, and 876 (SD036); Sanitary Sewer System, Facilities 837, 838, 919, 977, and 981, Area G Ramp, and Ragsdale/V Area (SD037).

After mailing the fact sheet to approximately 1,300 local community members and providing copies to the three local libraries, the Base initiated a 16 January – 15 February 2006 public comment period to obtain public input to the remedial action decision making process. Additionally, the Base posted the 1998 *North/East/West Industrial Operable Units, Travis Air Force Base, Proposed Plan for Soil, Sediment, and Surface Water* and the 2006 fact sheet on its Environmental Restoration Web site (<http://public.travis.amc.af.mil/pages/enviro>).

To further promote community acceptance of the remedial action changes, the environmental office held a public meeting on 26 January 2006 at 7:00 p.m. at the Northern Solano County Association of Realtors Office, 3690 Hilborn Road, Fairfield, CA. The meeting was announced in the fact sheet, and a public notice was placed in three local newspapers to inform the public of the meeting. At this meeting, the Base described the Air Force's proposed changes to its soil cleanup strategies at 12 of the 18 NEWIOU sites and the decision process used to develop them. This information was also in a supplemental handout provided at the meeting. Mr. John Foster was the only community member who attended the public meeting. At the end of the Base presentation, he asked for clarification that the process for evaluating and changing the action at each site is documented in the three technical memoranda (Human Health Tech Memo, Eco Tech Memo, and Groundwater Protection Tech Memo). Travis AFB representatives confirmed that that was correct. There were no other questions.

The Air Force and the regulatory agencies did not receive any public comments on the changes to the soil remedial actions.