

# THE FACTS

Information About  
Environmental Cleanup  
at McClellan AFB.

Produced by McClellan AFB Environmental Management

Number 2

## The Cleanup Schedule

The cleanup of McClellan AFB involves many overlapping steps. However, a framework and a schedule for the cleanup efforts have now been established under the Interagency Agreement between the Air Force, U. S. Environmental Protection Agency (EPA), and the California Department of Health Services (DHS). The schedule is shown on pages 2 and 3, following a discussion of the IAG, and the CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) process. CERCLA is commonly referred to as the Superfund.

### The Interagency Agreement

The Interagency Agreement (IAG) is a contract between the Air Force, EPA, and DHS that governs the cleanup activities at McClellan AFB. It is also a management tool. It sets deadlines for preparing different kinds of documents, and identifies agency and public comment periods. The Air Force, EPA, and DHS each have designated Remedial Project Managers, who oversee proper implementation of the Agreement.

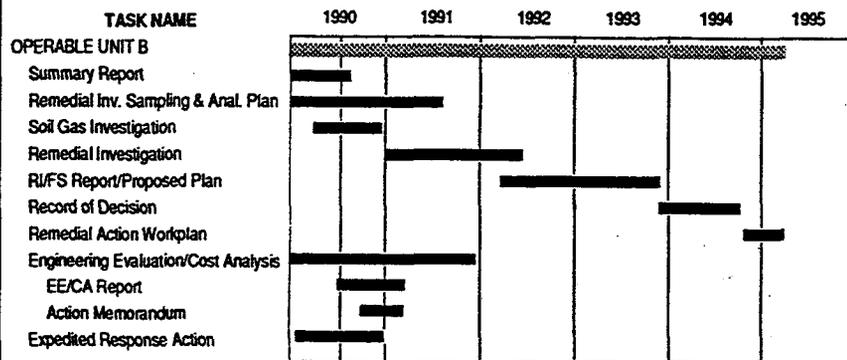
The IAG imposes fines for failure to meet deadlines. There is also a procedure to modify the schedule, if the need arises. Should disagreements arise (say on the method of cleanup of a particular area), the IAG sets up a procedure for dispute resolution.

### The CERCLA Process

CERCLA cleanups generally

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### Operable Unit B — Schedule of Activities



Investigations for each Operable Unit (OU) will follow the same basic process. OU B has been started first. The top bar on the schedule shows the duration of the investigation for the whole OU. The bars underneath it represent steps in that investigation.

- The **Summary Report** includes the preliminary assessments of sites where contaminants may have been released to the environment.
- The **Remedial Investigation Sampling and Analysis Plan** outlines the strategy that will be used to investigate the contamination around each site.
- The **Soil Gas Investigation** will seek to focus in on sources of contamination by sampling the soil gas in OU B. In other Operable Units, this step will be combined with the next step.
- The **Remedial Investigation (RI)** will determine the extent and magnitude of any con-

tamination.

- Results will be reported in the **Remedial Investigation/Feasibility Study (RI/FS) Report**. The Feasibility Study will compare different alternative solutions.
- The **Proposed Plan** will outline the remedy the Air Force proposes to use. This plan will be presented to the public for review.
- The **Record of Decision** describes the rationale used for selection of a remedy.
- Finally the **Remedial Action Workplan** outlines how the solution to the problem will be implemented.

Finally, for OU B, an **Engineering Evaluation/Cost Analysis (EE/CA)** is underway to control known contaminants in the groundwater beneath the OU. The EE/CA is a removal action, and includes the **Expedited Response Action** in the Building 666 area.

## IAG Schedule

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follow the RI/FS process--Remedial Investigation/Feasibility Study. This can be broken down into three major parts: discovery of contamination, investigation of the extent of the contamination, and remediation or cleanup. Discovery of the problem at McClellan AFB began in 1979 when contaminants were found in the groundwater beneath the Base.

The schedule at right primarily covers the investigation phase. Investigation involves many separate steps:

- preliminary assessments to find out if any, and what kinds of, contaminants have been or could be released;
- remedial investigations to learn the magnitude and extent of the contamination;
- and feasibility studies, to compare different methods of cleanup.

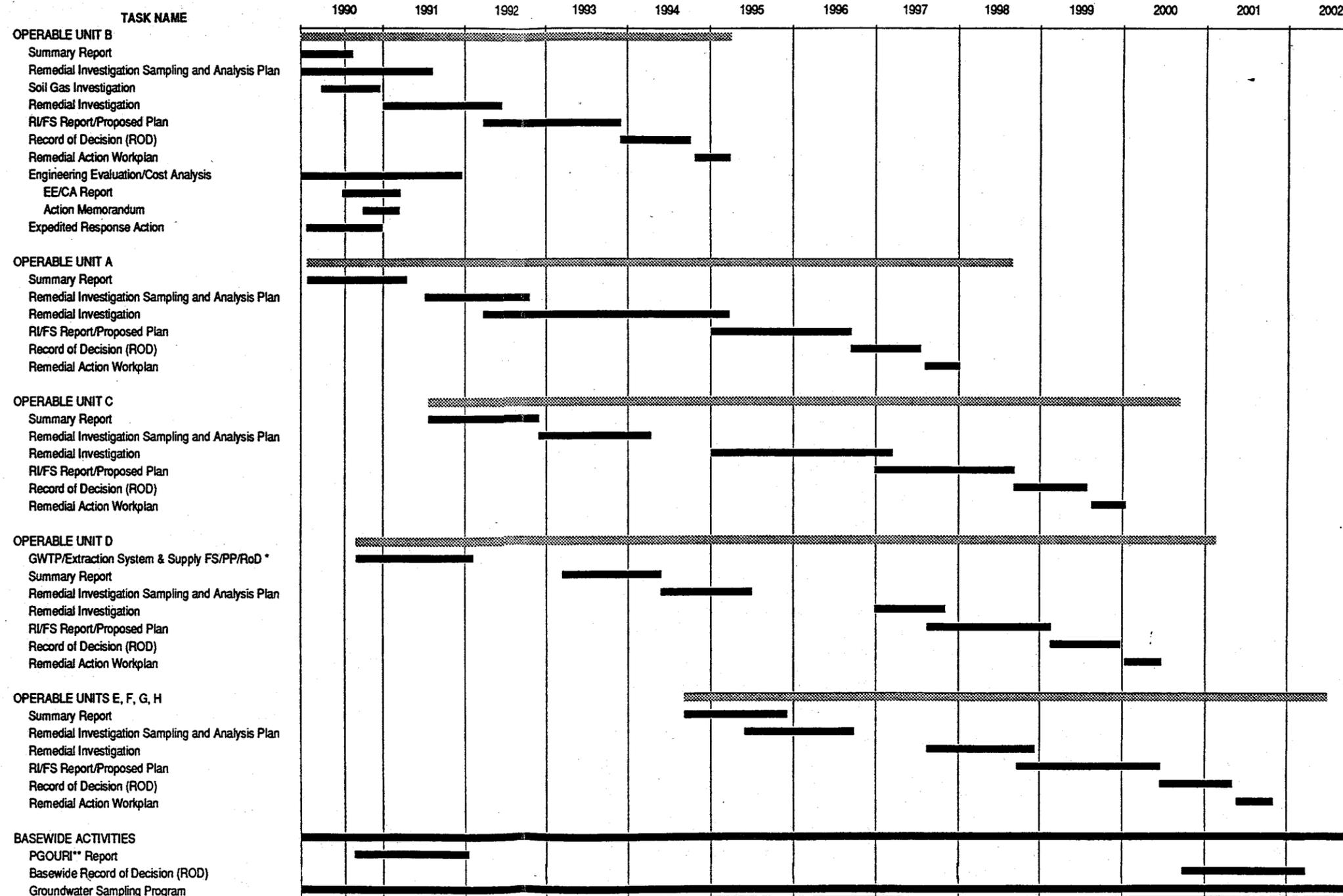
The Base has already started cleanup in several areas. For example, extraction and treatment of groundwater is underway in OU D and OU C. The final cleanup of the Operable Units will happen at the end of the RI/FS investigation phase. Because the final cleanup measures cannot be chosen before the feasibility studies are completed, they do not appear directly on the schedule. The recommended remedy will be reviewed by the public. Local newspapers will announce these public comment periods. The Record of Decision (ROD) and the Remedial Action Workplan will describe and outline the cleanup actions.

### The Schedule

The schedule of the McClellan AFB cleanup shows when each step of the investigation will take place. The Base has been divided into eight operable units, with the RI/FS steps being repeated for each operable unit. (The operable units roughly correspond to the old "Area" designations. See the map on page 4.) The order of investigation is: Operable Units B; A; C; D; and E, F, G, and H together. Each Operable Unit will have its own preliminary assessment/summary report (except E, F, G, and H, which will be investigated together), its own Remedial Investigation/Feasibility Study (RI/FS), and Record of Decision (see box, page 1). Final cleanup actions will begin once the investigations of

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# McClellan AFB CERCLA Program Schedule of Activities



NOTE: The Comprehensive CERCLA Workplan will be submitted on 20 January of each calendar year as required by the Interagency Agreement.

\* Groundwater Treatment Plant/Extraction System and Offbase Water Supply Feasibility Study/Proposed Plan/Record of Decision

\*\* Preliminary Groundwater Operable Unit Remedial Investigation

LEGEND: [Hatched Box] Duration of entire OU investigation.

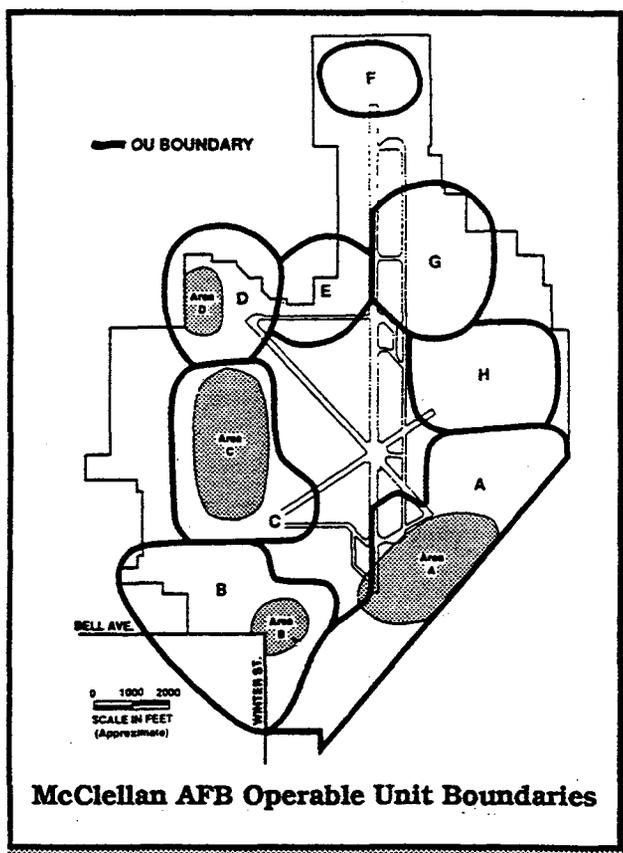
[Solid Black Box] Steps in OU investigation.

## IAG Schedule

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each Operable Unit are complete.

The primary issue at McClellan AFB is contamination of the groundwater. That contamination must be coming from somewhere. The Air Force has identified over 170 sites across the Base that may have released contaminants to the environment. Cleanup at some sites has already begun. If the RI/FS were now to proceed for the Base as a whole (that is, not broken into operable units), then a preliminary assessment and a remedial investigation would have to be performed over the entire Base before any cleanup action could begin. By breaking the Base up into operable units, the Air Force can investigate those problems which potentially pose the greatest threat to human health or the environment first, and start the cleanup action for them while it investigates problems that pose a lesser threat to human health.



## Expedited Actions: The Fast Track

The schedule of activities for Operable Unit (OU) B includes several items not shown for other OUs. For example the Air Force implemented removal actions such as the Engineering Evaluation/Cost Analysis (EE/CA) and the Expedited Response Action to control the migration of contaminants beneath OU B before they reach the base boundary or Base Well 18.

The Air Force will perform a removal action if it finds the need to move quickly to control an

actual or threatened contaminant release. They follow the same procedure as the more usual remedial actions, but they happen faster.

If the Air Force decides to perform EE/CAs or ERAs in other areas, they will be added to the schedule through the Comprehensive CERCLA Workplan, or CCW. The CCW, which outlines the entire cleanup at McClellan AFB, is updated every year in January.

## Commonly Asked Questions

**What areas will the Air Force clean up first?**

Cleanup will follow this order: Operable Units B; A; C; D; and E, F, G, and H together. These priorities are based on potential threats to the groundwater.

**Why?**

So the Air Force can investigate and clean up contamination that could migrate off base if not controlled.

**Why will it take so long?**

To thoroughly investigate a site is a long and complicated process, which includes agency and public review periods. That's why the Base has initiated an Expedited Response Action in OU B--to take

quicker action where it is needed.

**What happens if the Air Force misses a deadline?**

The Interagency Agreement imposes fines for missing deadlines. The Air Force or the agencies may request an extension of a deadline, if unexpected problems arise.

**If there's an extension on one part of the schedule, won't that throw the whole schedule off?**

Possibly. If the schedule is extended, it will be identified in the Comprehensive CERCLA Workplan, or CCW. This is issued on January 20 of every year.

For More Information  
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