

2.0 PROJECT DESCRIPTION

This EIR chapter describes how the proposed former landfill remediation would be implemented and the anticipated long-term maintenance and monitoring requirements.

2.1 OVERVIEW OF FORMER NTC LANDFILL REMEDIATION

The proposed remediation of the former NTC landfill includes the following elements:

- Remove and stockpile approximately 163,000 cubic yards (cy) of surface/overburden soil to reach the depths below surface grade at which MSW and BA are encountered
- Remove approximately 112,000 cy of MSW (consisting of household trash and debris) for disposal at landfill facilities located in San Diego County, including the Miramar, Otay, and Sycamore Canyon landfills
- Remove approximately 25,000 cy of BA material (consisting of existing burned refuse and trash); BA material would be excavated from the site and transported to appropriate regulated landfills in California, Arizona and Nevada in accordance with regulatory requirements
- Remove approximately 38,000 cy of additional soil to a depth of one foot below the limits of the MSW and BA materials; excavated soils would be disposed of as described for MSW and BA materials described above, as appropriate
- Import of a maximum of 100,000 cy of fill to backfill the excavated area¹
- Replace stockpiled surface/overburden material in the excavated area to prepare the site for future airport uses
- Implement a community health and safety plan including construction monitoring to address any potential nuisances, including the spread of dust and odor

A combination of visual screening and confirmation soil sampling and analysis would be used to determine the specific locations and volumes of materials to be removed from throughout the site and to potentially satisfy clean closure requirements. If the RWQCB determines that execution of the proposed project does not meet the requirements for clean closure under Title 27 California Code of Regulations (CCR), the Authority would continue to manage the site as a closed landfill. Although

¹ The amount of waste being removed exceeds the amount of fill projected to be imported by approximately 75,000 cy. This discrepancy reflects that (A) there are piles of soil on the existing site that would be stockpiled and used for backfill and (B) the post-remediation ground surface would be somewhat lower than surrounding terrain to help accommodate future airport uses of the site. While the specific future use(s) of the project site is (are) not known, it is probable that any future site development would entail some import of material (such as concrete for aircraft aprons or building foundations or asphalt for parking lots). The post-remediation site surface level will be higher than the groundwater table, in part to avoid potentially creating a bird air strike hazard associated with ponded water.

existing landfill site conditions are being managed in a manner protective of public health and safety and of the environment, the proposed project would remove those buried wastes that require such management and also significantly reduce future potential environmental impacts to soil and groundwater.

Because trucks hauling material to/from the site would utilize McCain Road, the trimming of ornamental street trees along McCain Road may be required to implement the project.

The proposed project would not address any BA materials located under existing airport apron or runway areas. Excavation of BA materials under the runway/apron areas would disrupt airport operations and infrastructure.

2.2 ON-SITE REMEDIATION ACTIVITIES

On-site remediation (construction) would include excavation, stockpiling, dewatering, odor control, loading waste onto trucks for removal and off-site disposal, protection of existing sewer lines that run under the former NTC landfill, and use of stockpiled soil and imported fill to bring the excavated areas back to a slightly lower grade ~~with than~~ the adjacent SDIA property.

2.2.1 Excavation, Stockpiling and Backfilling

During the project, surface/overburden soil would be removed in order to reach the depth where MSW and BA are located. The surface/overburden soil would be stockpiled on the site as near to the excavation as possible, using approximately six- to eight-foot-high piles. Stockpiled material would be covered if necessary using plastic tarps. Compliance with the best management practices (BMPs) and project Storm Water Pollution Prevention Program (SWPPP) requirements would be maintained at all times. As noted above, as overburden is removed, MSW and BA would be excavated and removed from the site along with an additional foot of soil. Fill would be imported by trucks and placed in the excavated area to an elevation above the water table. The stockpiled overburden would then be used as backfill to bring the site up to an elevation that is compatible with the site's designation for use for airport purposes.

The contractor would be expected to move the stockpiled soil using large-capacity, heavy equipment (Table 2-1 lists the types of equipment expected to be used on site). The preferred type of equipment would likely be scrapers to remove the overburden, with a large dozer to help push the scraper during the initial digging phase. There is some potential for use of additional heavy equipment such as front end loaders, possibly an excavator and dump trucks. A water truck would be required to be on site at all times during operations to provide dust control and help stabilize the soil.

Table 2-1 Construction Equipment Anticipated to be Used On-site	
<ul style="list-style-type: none"> • Pick-Up Truck • 20-Ton Dump Truck • Mechanics Truck • Flatbed Truck • Fuel Truck • Water Truck • Compressor Truck • Wastewater Removal Truck • Concrete Truck • Flatbed Tractor-Trailer • Backhoe • Scraper • Loader 	<ul style="list-style-type: none"> • Tracker Loader (Stockpile) • Crawler Dozer • Small Dozer • Trackhoe • Grader • Crawler Excavator • Crane • Pad Foot Compactor • Articulated Rear Dump • Sheepsfoot • Sheetpile Driver • Sheetpile Crane • Sweeper

Although, to a degree, the actual operations would be at the discretion of the selected contractor, the intention at this time is for a phased use of the former NTC landfill area to provide for rotation of the stockpiling, excavation and replacement process. One portion of the site would be designated as a stockpile area, and another designated as an excavation area. The stockpile area would be located adjacent to the excavation area wherever feasible. Once removal and backfill have been accomplished in an area, the process would continue such that previous stockpile areas would be excavated and previously excavated areas would receive stockpiles. Phasing would continue in this way until all of the MSW and BA areas have been excavated and replaced with fill and overburden. Positive management of the stockpile areas as described above would be maintained at all times. Multiple stockpile areas may be used consecutively depending on availability of space to place overburden material.

If the MSW or BA extends under SDIA's aircraft apron, Taxiway B and/or within 200 feet of Runway 9/27, that waste would be left in place. Similarly, if the MSW or BA extends under an existing utility line located adjacent to McCain Road, the MSW would be left in place to avoid disruption of those utilities (this is different than the high-pressure gas line and 12-kV electrical transmission line that would be relocated as described in Section 1.4.2).

2.2.2 Dewatering

The site is located approximately 700 feet north of San Diego Bay, and ranges in elevation from approximately 10 feet above mean lower low water (MLLW) to approximately 19 feet above MLLW in the airport parking lot, south of Spruance Road.

The former NTC landfill site is located near San Diego Bay and the boat channel, and it is at a relatively low elevation—on-site surface elevations range from approximately 10 feet to 19 feet above MLLW. Accordingly, it is anticipated that dewatering would be required to allow for the excavation of soil, MSW and BA below the water table. Groundwater would be extracted using pumps and disposed into a connection with existing City of San Diego sewer pipelines at or near the project area. As noted in Section 1.3.2, this proposed dewatering approach would require approval by, and a permit from, the MWW. Temporary detention of the groundwater may be required by the City prior to disposal into the sewer system. If the volume of groundwater being extracted to dewater the work area is sufficiently small, the water would be temporarily stored in above-ground tanks, if needed. However, if the volume of groundwater being extracted to dewater the work area cannot be managed with above-ground tanks in a cost-effective manner, then temporary detention ponds may be used to store extracted groundwater. If needed, tarps or other means of cover would be used to minimize odors and bird hazards related to the temporary detention ponds.~~If needed, this would be accomplished in tarp-lined temporary detention basins located onsite.~~ If pre-treatment of the extracted groundwater is required, this would be accomplished with temporary, portable treatment facilities installed on site for the duration of construction. Temporary above-ground pipelines and/or a wastewater removal truck may be used to transport extracted water from the excavation areas to a detention basin or the sewer line connection.

While the amount of groundwater to be extracted is unknown, the Authority has preliminarily estimated that the amount of water that would be extracted is approximately 222,750 cubic feet, or 1,666,285 gallons, over the course of the nine-month Project. Conservatively assuming five working days per week over an nine-month period (approximately 39 weeks), this would result in the extraction of an average of approximately 8,500 gallons per day of water. If, as expected, construction occurs six days per week (see Section 2.4, below), the amount of groundwater disposed on any given day could be correspondingly lower.

Pursuant to the MWW Industrial Wastewater Disposal Program requirements, the Authority would be required to submit analysis results for Chemical Oxygen Demand (COD), Total Suspended Solids (TSS) and all pollutants known or suspected to be present in the wastewater to be discharged. Table 2-2 shows the MWW testing requirements for groundwater discharges to the sewer system. The discharge would be metered, and a sample port would be installed at the point of connection to the sewer to enable easy access to groundwater samples during the groundwater discharge process.

In the event that extracted groundwater is determined not to meet Industrial Wastewater Disposal Program requirements (described in EIR Section 4.4), on-site pre-treatment would be provided. Under the Industrial Wastewater Disposal Program, any entity proposing to discharge extracted groundwater to the sewer must install, operate, and maintain any and all pretreatment equipment necessary to comply with the terms of the permit or authorization and with the program's General

and Specific Prohibitions. When discharges originate from sites contaminated with petroleum products (e.g., gasoline, diesel, AvGas, jet petroleum [JP]) or organic solvents, the permittee must provide pretreatment equivalent to the RWQCB's pretreatment technology standards for organics (carbon adsorption or air stripping). All pretreatment equipment must be in place and fully operational prior to commencing discharges to the sewer system.

Table 2-2 Industrial Wastewater Disposal Program Testing Requirements for Groundwater Disposal to Sewers		
Known/Suspected Contaminant(s)	Initial Analyses Required	Units
Gasoline	Benzene BTEX Flash Point- Instantaneous Lead, Total TPHg, DOHS modified 8015 Chemical Oxygen Demand Solids, Total Suspended	$\mu\text{g/L}$ $\mu\text{g/L}^a$ Deg F mg/L mg/L mg/L mg/L
Diesel/Jet Propellant (JP)	Flash Point- Instantaneous Oil & Grease, SGT-HEM TPHd, DOHS modified 8015 (optional) Chemical Oxygen Demand Solids, Total Suspended	Deg F mg/L mg/L mg/L mg/L
Other Contaminants	Discharger must contact the IWCP, prior to applying for authorization, to determine the initial monitoring requirements.	

Source: MWWD, Industrial Wastewater Control Program Policy for Groundwater Discharges to Sewer (City of San Diego 2007a).

In addition to groundwater dewatering, it also is possible that dewatering of the excavated material may be required. Pursuant to landfill disposal requirements, the waste material being loaded onto trucks for off-site disposal may not contain “free liquids.” That is, although this material may contain moisture, it cannot be so wet that pools of liquid are present in the excavated waste. Accordingly, some dewatering of excavated waste may be necessary on site. This could be accommodated by compression (e.g., squeezing liquids out of the waste) or on-site drying prior to loading.

2.2.3 Odor Control

The decomposition of MSW—especially in a wet, anaerobic (low oxygen) environment such as the former NTC landfill—can generate landfill gases with associated odors. In particular, sulfides (e.g., hydrogen sulfide, dimethyl sulfide, mercaptans) can carry a “rotting egg” smell. Although

sulfides typically make up only a very small percentage of landfill gases (with the vast majority of landfill gases being odorless methane and carbon dioxide), the odors associated with sulfides can nonetheless be quite strong. Excavating the MSW would allow the release of landfill gases that had been effectively trapped below the surface by the overburden soils covering the former NTC landfill.

As part of the proposed project, odor controls would be used to minimize the potential effect of odors on members of the surrounding community, including residents of Liberty Station, travelers at SDIA, and visitors to Spanish Landing Park, which is located between North Harbor Drive and San Diego Bay. Potential means of odor control include minimizing the amount of exposed MSW at any one time, through the use of a rotating excavation and stockpile approach as described above, and by covering exposed MSW with soil, tarps and/or surfactants (similar to a soapy foam) to help trap odors. During construction, the Authority will have a process in place to respond to odor complaints from the public and, as necessary, to work with the contractor to implement additional odor controls. Refer to Section 4.3 of this EIR for a discussion of odor and air quality impacts associated with the proposed project.

2.2.4 Sewer Line Protection

Two City of San Diego MWWWD sewer lines are located below the former NTC landfill site: North Metro Interceptor 1 and 2. These are large pipelines that carry regionally generated untreated wastewater flows to the nearby Pump Station No. 2, which then pumps the wastewater to the Point Loma Wastewater Treatment Plant for treatment and, ultimately, ocean disposal. North Metro Interceptor 1 is 96-inches in diameter and North Metro Interceptor 2 is 114-inches in diameter (see Figure 1-3). North Metro Interceptor 1 is within an easement that allows the City of San Diego surface right access along its alignment; the North Metro Interceptor 2 is a more recently constructed pipeline without surface access rights. Because of the pipelines' sizes, and because they are gravity pipelines (meaning that every section of each pipe needs to maintain a sufficient downward slope toward Pump Station 2 to convey wastewater flows by gravity), it is not feasible to relocate either pipeline.

The proposed landfill remediation project would not, in and of itself, adversely affect the sewer pipelines, which would be avoided during excavation and backfill. It is reasonable to expect, however, that once the former NTC landfill is remediated, the site would be used for airport purposes. Although it is not certain what type of airport uses would occur at the site, it is prudent to plan for those uses currently under consideration in the SDIA Airport Master Plan and its associated EIR. Accordingly, the Authority proposes to provide structural improvement of the two interceptor sewer pipelines to allow for a variety of airport uses by increasing the amount of weight the sewer lines can support.

The structural support is expected to be provided in one of two ways. The first option would be to insert a liner inside of the pipelines to provide additional structural support. The liner would need to be thin enough so that it would not substantively reduce the capacity of the affected pipeline and would also need to be corrosion-resistant (municipal wastewater can have a corrosive effect over the long term). The liner would also need to provide sufficient strength to prevent pipeline damage as a result of future airport operations at the surface. The second option would be to install a manufactured lightweight material in lieu of soil above the pipelines. By reducing the weight of soil over the pipelines, the pipelines would be better able to support additional weight on the ground surface.

Providing a concrete arch over the pipeline, with support piles driving into the ground, was also evaluated; however, it was found to be an impractical approach and is not currently proposed as a potential method of pipeline protection.

2.2.5 Aviation Safety Requirements

As noted previously, SDIA has a single runway. Accordingly, the runway must remain in operation during the proposed former landfill remediation activities, as must those taxiways that serve to connect the runway to the passenger terminal facilities located on the south side of the airfield. Because the landfill remediation activities would be occurring immediately adjacent to an active airfield, certain safety measures specific to construction at an airport would be required. These safety measures would be based on the guidance and requirements provided in FAA Advisory Circular No. 150/5370-2E, *Operational Safety on Airports During Construction* (FAA 2003). Note that general elements of the safety program are described in this EIR; the Authority would be required to approve a detailed construction safety plan pursuant to Advisory Circular No. 150/5370-2E requirements prior to the start of construction. The construction plan would also need to be consistent with 14 Code of Federal Regulations (CFR) Part 139, Certification and Operations: Land Airports Service Certain Air Carriers. Compliance with the guidance provided in FAA Advisory Circular No. 150/5370-2E should, however, also ensure compliance with 14 CFR Part 139. Because the majority of construction would occur outside the fenced limits of the airport and away from the airfield, not all elements of FAA Advisory Circular No. 150/5370-2E would be applicable to all aspects of the project.

Key elements of the construction safety plan would include the following:

- The Authority would issue notices to aircraft rescue and fire fighting personnel regarding the proposed construction activities.
- A construction vehicle plan would be developed to ensure coordination between the contractor, airport tenants, and the air traffic control tower personnel.

- Construction vehicles potentially entering the airfield area would be marked and/or flagged, as applicable, to ensure visibility, in accordance with FAA Advisory Circular 150/5210-5B, *Painting, Marking, and Lighting of Vehicles Used on an Airport* (FAA 1986).
- Radio frequencies for equipment operators would be limited to frequencies that would not interfere with air traffic control-aircraft communications.
- In the event that existing Airport security fencing would be affected by construction, security would be provided to ensure that the airfield remains secure at all times.
- No construction would occur within 200 feet of the Runway 9/27 centerline; similarly, no excavation or open trenches would be allowed within 200 feet of the runway centerline.
- Personnel, material and/or equipment would not be allowed to penetrate an Obstacle Free Zone established around Runway 9/27, as described below:
 - The Obstacle Free Zone extends at ground level from the runway centerline out to 200 feet on either side
 - At 200 feet from the runway centerline, the Obstacle Free Zone extends up vertically approximately 25 feet and then extends outward and upward at a slope of 5:1 (horizontal; vertical) to an ultimate height of 150 feet above the runway elevation (see Figure 2-1)
 - The 400-foot-wide Obstacle Free Zone also extends outwards and upwards from the ends of the Runway 9/27 at a slope of 50:1

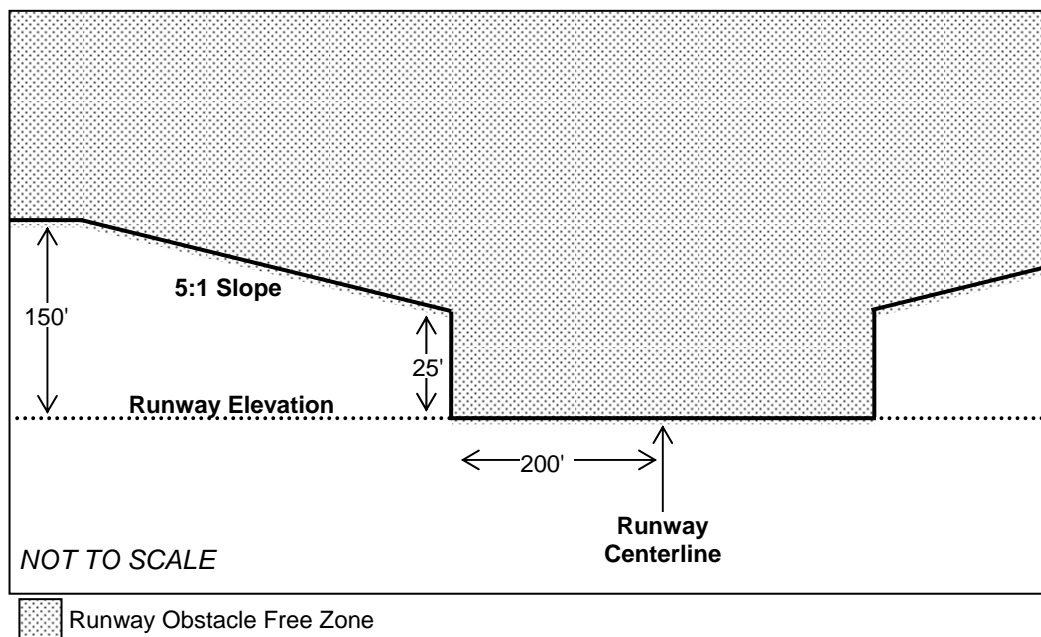


Figure 2-1. Schematic Diagram of Runway Obstacle Free Zone

- Work near active taxiways must be at a distance of at least one-half the wingspan of aircraft permitted to use that taxiway, unless:
 - The contractor’s proposed construction near-taxi activity is coordinated with the Authority
 - Appropriate Notices to Airmen are issued
 - Appropriate equipment and vehicle marking and lighting are used
 - Adequate clearance is maintained between construction equipment and materials and any equipment, assuming that the aircraft has its main landing gear at the edge of the taxiway pavement—if adequate clearance cannot be maintained, it is necessary to move construction equipment and personnel for each passing aircraft, with flag persons directing the construction equipment and, potentially, “wing walkers” guiding the aircraft
- Stockpiled materials are not allowed within the Obstacle Free Zone.

The proposed project also would entail measures to reduce the potential for bird air strike hazards (BASH). Collisions between birds and aircraft can pose a safety hazard; accordingly, it is important to minimize project features that could attract additional birds to the Airport. The MSW present in active landfills can serve to attract gulls and ravens, among other avian scavengers. The extent to which decades-old MSW would have the same potential for attractions is not known; nonetheless, the project would include measures to discourage birds from scavenging at the project site.

The proposed approach of having only portions of the former landfill site excavated at any one time would help to minimize the exposure of MSW to birds. Additionally, some of the proposed odor control measures, such as covering exposed MSW with tarps or surfactants, would also help to discourage scavenging by birds. In addition, trucks used to transport waste will be tarped to reduce potential odor issues during transportation. Other bird-control measures that would be implemented would depend on the extent to which birds are attracted to the site, and may include maintaining human presence at all times and/or the use of recorded distress calls. ~~Active methods of gull control, such as pyrotechnics or propane cannons, could be implemented if necessary; however, these would require the permission of the FAA, the California Department of Fish and Game, and the USFWS.~~

2.3 OFF-SITE ACTIVITIES

The main off-site activity associated with the proposed landfill remediation would be the hauling of excavated material away from the site and the hauling of fill to the site.

The MSW would be hauled to San Diego County landfills including the Miramar, Otay and Sycamore Canyon landfills. For regulatory reasons, BA would be hauled for disposal at regulated landfills in California, Arizona and Nevada.

HELIX

2.3.1 Destination Landfills

The MSW, classified as non-hazardous waste, would be disposed at a combination of one or more local Class III solid waste facilities, including Miramar Landfill, Otay Landfill, and/or Sycamore Canyon Landfill. Minor quantities of excavated soil may also be disposed off-site and are likely to be classified non-hazardous waste destined for local landfills. If these landfills reach their permitted capacity for MSW, the MSW may be disposed at the Copper Mountain Landfill in Wellton, Arizona. Some BA may have toxicity levels requiring it to be classified as a hazardous waste under Resource Conservation and Recovery Act (RCRA) requirements. This BA is designated for disposal at a properly permitted Class I solid waste facility, Clean Harbors, in Buttonwillow, California. Any BA classified as RCRA-hazardous also could be disposed at the U.S. Ecology facility in Beatty, Nevada, a properly permitted Class I solid waste facility. Some non-RCRA, California-hazardous BA may be disposed at the properly permitted Copper Mountain Landfill in Wellton, Arizona. Table 2-3 summarizes the facilities that would receive waste under the proposed project.

Table 2-3 Facilities That Would Receive Waste Under the Proposed Project	
Facility Name	Facility Description
<i>California Facilities</i>	
Miramar Landfill	Miramar Landfill is run by the City of San Diego, Environmental Services Department. The landfill accepts MSW. The landfill is currently in the permitting process for a height increase that would add approximately 4 to 5 years to the landfill's life, allowing it to operate to around 2016. A Final EIR has been prepared for the height increase, and the permit is expected to be complete in the next several months. The landfill currently accepts approximately 1.4 million tons of waste a year and would close in 2011 if the height increase is not approved. The Miramar Landfill is permitted to accept 8,000 tons of solid waste per day, and is currently processing an average of approximately 5,000 tons per day. ^a
Otay Landfill	Allied Waste Industries, Inc. operates Otay Landfill, located in Chula Vista. The landfill accepts green materials, mixed municipal waste, construction and demolition waste, agricultural waste, biosolids, and tires. The Otay landfill is permitted to accept a maximum of 5,830 tons per day and accepts an average of approximately 4,000 tons per day. Covering a total area of 464 acres, the Otay landfill has a remaining capacity of approximately 62 million cubic yards. The estimated closure year for the Otay landfill is 2021. ^b

**Table 2-3 (cont.)
Facilities That Would Receive Waste Under the Proposed Project**

Facility Name	Facility Description
<i>California Facilities(continued)</i>	
Sycamore Canyon Landfill	The Sycamore Canyon Landfill, located in the City of San Diego, is operated by Allied Waste, Inc. and receives MSW. The landfill was issued a revised permit on September 15, 2006 that increased the daily acceptance of disposal to 3,965 tons per day and indicates that the landfill will reach capacity in the year 2031. The landfill is currently receiving an average of 3,500 tons of MSW per day. The landfill is currently undergoing CEQA review for expansion. ^c
Clean Harbors Facility	The Clean Harbors Facility, located in western Kern County, approximately 11 miles west of I-5, is operated by Clean Harbors Environmental Services. The Clean Harbors Facility is a Class I landfill, and has a permitted maximum acceptance rate of 10,482 tons per day. The Clean Harbors facility has as estimated closure date of 2040. ^d
Copper Mountain Landfill	Copper Mountain Landfill in Wellton, Arizona, is a solid waste landfill operated by Copper State Recycling, Inc. The landfill accepts municipal solid waste and non-hazardous special waste. The landfill does not have a daily limit or maximum amount of waste it can take in. The amount of waste accepted at the landfill varies each day. The minimum waste received in a day is approximately 600 tons. The landfill has adequate capacity to accept waste for 100 more years. ^e
<i>Arizona Facilities</i>	
U.S. Ecology Facility	The U.S. Ecology facility, located in Beatty, Nevada, approximately 100 miles northwest of Las Vegas, treats and disposes of hazardous and non-hazardous industrial wastes. The U.S. Ecology facility, which covers approximately 80 acres, accepts both bulk solids and containerized waste, and maintains an on-site laboratory to perform required analysis on waste streams. The facility is a fully permitted RCRA, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and Toxic Substances Control Act (TSCA) facility (American Ecology 2007a). There is no maximum daily intake limit at the facility; the facility can take in as much waste as it can process each day. On average, the facility accepts 400 to 450 tons per day. The landfill cell currently being utilized at the facility has a remaining capacity for approximately 15 more months. Early next year (2008), permitting will begin for the new cell, which is expected to have a capacity of 2.5 million cubic yards, and an estimated life of 30 years. ^f

References:

- ^a City of San Diego 2007b
- ^b California Integrated Waste Management Board 2007
- ^c City of San Diego 2007b
- ^d California Integrated Waste Management Board 2007
- ^e Copper Mountain Landfill 2007
- ^f America Ecology 2007b

2.3.2 Haul Trips and Routes

Approximately 142 one-way truck trips per day would be needed to haul materials to and from the project site. All project traffic would enter the project site from the east via North Harbor Drive. Due to turn restrictions at the intersection of North Harbor Drive and McCain Road, approximately 50 percent of truck traffic exiting the project site is expected to take McCain Road to North Harbor Drive west to access I-8 from Nimitz Boulevard. The other 50 percent of exiting truck traffic is expected to exit from McCain Road, travel briefly west on North Harbor Drive, take a U-turn at Lee Court, and travel east along North Harbor Drive to access I-5 from India Street. If the McCain Road/North Harbor Drive intersection is signalized prior to initiation of the landfill remediation (see Section 1.4.3), then project trucks could turn left from McCain Road onto east-bound North Harbor Drive without having to execute the above-described U-turn at Lee Court. Regardless of the local (near-Airport) route used, all project-related truck traffic would generally be headed to/from the project site and either I-8 or I-5.

2.4 SCHEDULE

Construction activities would commence after RWQCB approval of the Closure (Remediation) Plan, City of San Diego/LEA concurrence, and procurement of the necessary equipment, materials, and subcontracting services. The estimated project schedule has been divided into four main tasks.

- **Pre-Construction** Activities would involve activities associated with the pre-construction surveys, permitting, monitoring well abandonment, implementation of engineering controls to reduce on-site and off-site impacts from dust, odor, vapor, and gas emissions, bird control, site layout and construction of stockpile areas, site security, and temporary facilities. This phase is anticipated to occur during December 2007.
- **Site Work** would include the demolition and removal of hardscape, site clearing and grubbing, excavation of buried wastes and soil, excavation confirmation soil sampling and analytical testing, waste and soil stockpile management and characterization, preparation of waste for transportation, waste loading and hauling for off-site disposal of wastes. This phase is anticipated to take seven months: January 2008 to August 2008. Work would be accomplished six days per week, Monday through Saturday.
- **Site Restoration** would include backfilling excavated areas with the on-site soils and imported clean borrow materials. This phase is anticipated to be completed by December 2008. Work would be accomplished six days per week, Monday through Saturday.
- **Post-Construction Activities** would include decontaminating and demobilizing equipment, restoration of utilities, as necessary, site cleanup, and implementation of storm water pollution prevention BMPs. This task also includes preparing a final remediation report that documents

field methodologies and results of remediation activities performed at the site. The remediation report is anticipated to be ready for submittal in January 2009.

2.5 LONG-TERM MONITORING AND MAINTENANCE

A well destruction permit would be obtained from the Department of Environmental Health (DEH) to remove and destroy existing groundwater and landfill gas monitoring wells at the project site prior to initiation of site work. Well destruction waste cuttings would be disposed as non-hazardous waste and the well destruction would be documented in a 60-day report submitted to DEH. Wells located outside the proposed excavation area would be left in place and protected.

Waste removal activities described in the Closure Plan are intended to meet clean closure criteria such that post-remediation maintenance and land use planning would not be required for the project site. Successful completion of clean closure would eliminate the need for a post-remediation maintenance period and removes the site from being subject to SWRCB- and/or CIWMB-promulgated landfill requirements, per Title 27 CCR, Section 20950. However, if clean closure is not successful, a post-remediation maintenance plan, as required by Title 27 CCR, Section 20950, would be included with the final remediation report. Regardless of the success of the remediation activities, the project site is anticipated for use to support airport operations, potentially including aircraft apron, extension of T2 West, roadway and parking facilities. Whether clean closure is successful or not, upon completion of remediation activities, the site would be used for airport purposes.

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