



KELLY AFB
TEXAS

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 3225

Kelly Restoration Advisory Board (RAB)

Technical Review Subcommittee (TRS)

Meeting Agenda

September 13, 2005, 6:30 p.m.

Greater Kelly Development Authority
143 Billy Mitchell Blvd., Bldg. 43, Suite 6
GKDA Conference Room

6:30 - 7:00 TAPP Contractor Appointment
For Semi Annual Compliance Plan Review

7:00 Adjournment

Chartered Bus Tour

7:00 - 8:30 Tour of remediation sites

Upcoming Meeting Dates

Next RAB Meeting (Elections): 18 October 2005

Oct. 18, 6:30p.m.: Kennedy High School, Cafeteria, 1922 S. General McMullen*

Next TRS Meeting

Nov. 8, 6:30p.m.: Environmental Health & Wellness Center, 911 Castroville Rd*

***MEETING DATES, LOCATIONS AND AGENDA ITEMS ARE SUBJECT TO CHANGE.**

September 13, 2005
**Technical Review Subcommittee (TRS) Meeting
of the Kelly Restoration Advisory Board (RAB)
Greater Kelly Development Authority
143 Billy Mitchell Blvd., Bldg. 43, Suite 6
San Antonio, Texas 78226-1816**

Meeting Minutes

RAB Community Member Attendees:

Mr. Robert Silvas, Community Co-chair
Mr. Rodrigo Garcia, Jr.
Mr. Daniel Gonzalez
Ms. Coriene Hannapel
Mr. Ruben Martinez
Mr. Nazirite Perez
Mr. Armando Quintanilla
Mr. Michael Sheneman

RAB Government Member Attendees:

Other Attendees:

Mr. Todd Colburn, Air Force Real Property Agency (AFRPA) Contractor
Ms. Larisa Dawkins, AFRPA
Ms. Cheri Kirkpatrick, AFRPA Contractor
Ms. Norma Landez, AFRPA
Mr. Rey Nieto, AFRPA
Dr. David Smith, Facilitator

The meeting began at 6:40 p.m.

I. Introduction – Dr. David Smith

Dr. David Smith began the meeting by welcoming RAB members and other attendees.

II. TAPP Contractor Selection for 2005 Semiannual Compliance Plan Report – Mr. Rey Nieto

Mr. Rey Nieto summarized the TAPP contractor bids received for the 2005 Semiannual Compliance Plan Report and the importance of RAB members explaining their reasoning for how the contractor will provide the best value when voting.

RAB members voted on the TAPP contractor and explained their reasoning for best value. The vote was 7 in favor of Clearwater Revival, none opposed.

III. Announcement of GWTP and cleanup bus tour – Dr. David Smith

Dr. David Smith informed everyone the meeting would be adjourned to begin the bus tour.

IV. Adjournment

The meeting was adjourned at 7:20 p.m.

These minutes have been composed in accordance with Robert's Rules of Order as per the request of the RAB members.



Robert Silvas
Community Co-chair

10/11/05
Date



Adam Antwine
Installation Co-chair

10/11/05
Date

Semiannual Compliance Plan Report

TASK	Geomatrix		Neathery		Clearwater Revival	
	HOURS	RATE AMOUNT	HOURS	RATE AMOUNT	HOURS	RATE AMOUNT
Attend Preperformance Meeting	2	\$ 115 \$ 230.00	2	\$ 90 \$ 180.00	2	\$ 75 \$ 150.00
Develop Schedule	1	\$ 115 \$ 115.00	1	\$ 90 \$ 90.00	1	\$ 75 \$ 75.00
Tech Review	12	\$ 115 \$ 1,380.00	30	\$ 80 \$ 2,400.00	50	\$ 75 \$ 3,750.00
			5	\$ 135 \$ 675.00		
Oral Presentation to TRS	4	\$ 115 \$ 460.00	3	\$ 90 \$ 270.00	2	\$ 75 \$ 150.00
Report Preparation	8	\$ 115 \$ 920.00	8	\$ 80 \$ 640.00	12	\$ 75 \$ 900.00
Prepare Response to TRS	4	\$ 115 \$ 460.00	3	\$ 80 \$ 240.00	8	\$ 75 \$ 600.00
Presentation to RAB	4	\$ 115 \$ 460.00	3	\$ 90 \$ 270.00	2	\$ 75 \$ 150.00
TOTALS		\$ 4,025.00		\$ 4,765.00		\$ 7,275.00

TAPP Budget Update

Beginning Amount \$100,000.00

Fiscal Year	Project/Document Name	Contractor	Amount
1998	ATSDR Report (Water)	University of Maryland	\$9,706.00
1998	1997 Base-wide Remediation Assessment	Clearwater Revival	\$6,975.00
1998	OU-2 Workplan	Neathery Environmental	\$5,145.00
1999	Zone 3 Corrective Measures Study Addendum	Clearwater Revival	\$6,375.00
1999	Remedial Investigation of Zone 4 OU-2	Neathery Environmental	\$6,195.00
1999	Final Zone 5 Corrective Measures Study	Geomatrix	\$3,617.50
2000	Shallow Groundwater Report	Geomatrix	\$5,572.50
2000	Site S-8 Draft Final Corrective Measures Investigation	Neathery Environmental	\$5,660.00
2000	Site MP Draft RCRA Facility Investigation	Clearwater Revival	\$5,925.00
2001	Zone 3 RCRA Facility Investigation	Clearwater Revival	\$5,775.00
2001	Zone 4 Corrective Measures Study	Geomatrix	\$8,390.00
2001	ATSDR Health Assessment	University of Maryland	\$7,428.00
2003	(Mod-01) Additional Travel Expenses for Presentation to RAB	Clearwater Revival	\$500.00
2003	Zone 2/3 Correctives Measures Study	Neathery Environmental	\$5,570.00
2003	ATSDR Air Emission Study	University of Maryland	\$8,366.00
2005	2005 Semiannual Compliance Plan	TBD	TBD
Total Spent to Date			\$91,200.00
Remaining Balance			\$8,800.00

2004

**STATEMENTS OF OBJECTIVES (SOO)
REVIEW JANUARY 2005 SEMIANNUAL COMPLIANCE PLAN REPORT**

1.0 GENERAL

1.1 Scope

This task is to review the January 2005 Semiannual Compliance Plan Report for the former Kelly Air Force Base (AFB), focusing on the off-base impacts from Zones 2, 3, 4, and 5, including an identification of gaps in the location of monitoring wells, and identification of any trends in the contamination, providing a layperson's explanation of the 2004 annual shallow groundwater assessment.

1.2 Background

The compliance plan report documents the results of the annual groundwater sampling conducted at the former Kelly AFB in San Antonio, Texas. The former base conducts annual assessments of the shallow groundwater in accordance with the Texas Commission of Environmental Quality (TCEQ) issued Compliance Plan (CP-50310), dated on June 12, 1998. The annual assessment is used to determine the effectiveness of ongoing remedial activities in improving the quality of groundwater in the surficial (shallow groundwater) aquifer. The annual groundwater assessments began in 1994. The report describes current remedial activities, summarizes results of groundwater data collected during 2004, and evaluates these results with respect to historical data collected since 1994. In addition to these data, the analysis for the 2004 assessment considers site hydrogeology, including groundwater and surface water interaction.

1.3 Objectives

1.3.1 The contractor shall furnish all professional non-personal service labor, management, supervision, tools, materials, equipment, transportation, mailings, and reproductions, unless specified herein, for the assigned tasks issued against this Blanket Purchase Agreement.

1.3.2 The contractor shall provide technical assistance to the Restoration Advisory Board (RAB) and RAB Technical Review Subcommittee (TRS) by interpreting and translating the data in the compliance plan report.

1.3.2.1 The following specific tasks may be required for this project:

- Attend a pre-performance meeting
- Develop and submit a schedule for completion of the work
- Conduct a technical review of the compliance plan report
- Conduct an oral presentation of the report's conclusions at a TRS meeting
- Provide a review of the compliance plan report in layman's terms
- Provide a response to TRS comments, either orally or in writing

- Present the final report at a RAB meeting
- Participate in teleconference call

1.4 Guidance and Compliance Documents

All assessments and recommendations shall comply with all Federal, State, and local environmental laws and regulations including, but not limited to applicable portions of the statutes and regulations cited below. The contractor shall be provided with the Compliance Plan Report; however, the contractor is responsible for obtaining all public documents as needed based on the individual tasks issued against this agreement. Examples of the types of documents that may be required are listed.

- Kelly Permit HW-50310 and Compliance Plan CP-50310, 12 June 1998, and subsequent Class 3 Modifications.
- Installation and Closure of Shallow Aquifer Wells and Soil Borings on Kelly Air Force Base Technical Design specifications (TDS), December 1998.
- Final Quality Program Plan 2004 Compliance Program/Groundwater Monitoring, April 2004.
- Final Kelly AFB Basewide Quality Assurance Program Plan and Sampling and Analysis Plan, August 1999.

2.0 PROGRAM MANAGEMENT

2.1 Background Data/Information Review

2.1.1 The Air Force Real Property Agency (AFRPA) shall provide the contractor, where available, all pertinent and available background information concerning this task order. The contractor may be required to review/obtain additional background data information as required for the performance of the required services.

2.1.2 To accommodate the Air Force's remediation schedule, the contractor and the Air Force shall agree on a schedule or timeline for this task based upon the hours agreed on between the contracting officer and the contractor at time of award of the task. The contractor shall be required to meet the required timeline. Any extension of time must be agreed to by the AFRPA and RAB, and approved in writing by the Contracting Officer.

2.2 Meetings

2.2.1 Pre-Performance Conference – A pre-performance conference shall be held after the award of the order and prior to commencement of the work at a time, place and date specified by the Contracting Officer, as soon as the Compliance Plan report is received by the Air Force. Discussions at the meeting shall include the development of a mutual understanding relative to issuing task orders, scheduling and administering the work.

2.2.2 Contractor is invited to attend TRS meetings (normally held the second Tuesday of February, March, May, June, August, September, November, and December) and RAB meetings (normally held the third Tuesday of January, April, July and October).

3.0 PROJECT EXECUTION

3.1 Specific Requirements

3.1.1 Technical Review Report: This requires a review of the specific report and the applicable documents to be reviewed. The contractor is tasked with evaluating the report with respect to current environmental actions by the Air Force, assessing the completeness of the reports and adequacy of proposed or current actions, and making recommendations for future actions.

3.1.1.1. The written report shall include a defense of the process for making the determinations and an evaluation of the levels of confidence in the recommendations. The report need not be lengthy – an executive summary format is desirable. It must be written in layman's terms, so the RAB shall easily be able to communicate the findings to the community, if necessary.

3.1.1.2 All submittals must be double-sided, 100% post-consumer, recycled paper.

3.1.2 Technical Oral Presentation: This task order involves presenting the findings to the members of the TRS at a regularly scheduled TRS meeting time, followed by presenting a final presentation to the RAB at a regularly scheduled RAB meeting time. A firm date for these meetings shall be scheduled at the time the order is placed. TRS meetings are normally held the second Tuesday of February, March, May, June, August, September, November, and December at 6:30 p.m. TRS meetings are usually held at the Environmental Health and Wellness Center, 911 Castrovilla Road, San Antonio, Texas. RAB meetings are normally held on the third Thursday of January, April, July, and October at 6:30 p.m. at Kennedy High School, 1922 South General McMullen, San Antonio, Texas.

3.1.3 Response to Comments: Following the review of the written report and/or oral presentation, RAB members may have comments they wish addressed. The Contractor shall provide a written response to each question from the RAB, if so stated in this task order. Comments received before the oral presentation may also be delivered verbally at the presentation.

3.2 Public Affairs

The contractor shall not make available to the news media, nor make public disclosure of any data resulting from this contract during the performance of this contract. During the performance of this contract, the contractor shall refer all press or public contacts to the DoD co-chair. The documents produced and a transcription of the RAB presentation shall be placed in the Administrative Record and Information Repository by the Air Force. After completion of all requirements the public disclosure restriction shall be removed.

4.0 SUBMITTAL/DELIVERABLES

Each task order shall specify the required deliverables, with the quantities and time frame specified. Each written submittal shall include a cover letter stating the deliverable being provided and shall include the Blanket Purchase Agreement number and Task order number. The contractor shall provide a copy of the cover letter to the contracting officer. Copies of reports do not need to be provided to the contracting officer unless specified in the Task order. The details of the specific deliverables shall be identified with the award of the project.

5.0 CONTRACT SURVEILLANCE

5.1 Quality of Work

The contractor is solely responsible for the quality of the work. The Inspection of Services Clause applies to this order.

5.2 Inspection/Oversight Responsibilities and Acceptance

5.2.1 The Senior Representative of the former Kelly AFB is the Installation Co-Chair of the RAB. The Contracting Officer (C.O.) shall designate a C.O. Representative (COR) who shall act as liaison between the Contractor and the RAB. The Contracting Officer shall be notified of any conflicts and shall resolve any problems that cannot be mutually resolved between the Contractor, Installation Co-Chair, and the RAB Community Co-Chair, or designated representatives. A meeting of all parties, at no additional cost to the government, may be called by the Contracting Officer to discuss and propose solutions to resolve discrepancies.

5.2.2 The Contractor is advised that only the Contracting Officer can obligate the government or direct the contractor. The COR and the RAB members DO NOT have this authority. The contractor SHALL NOT EXCEED the total amount of any order awarded without prior written approval of the contracting officer

5.2.3 The COR, with the RAB's concurrence, shall certify acceptance at completion of the task.

6.0 POINTS OF CONTACT

A list of Points of Contact shall be available with the award of this task order.

BPA F41622-98-A-5882

Request Date: 15 Jul 05

Semiannual Compliance Plan Report

Clearwater Revival

TASK	HOURS	RATE	AMOUNT
Attend	_____	\$ 75.00	_____
Preperf Mtg Mtg Exp	_____	\$ 500.00	_____
Develop Sched	_____	\$ 75.00	_____
Tech Review	_____	\$ 75.00	_____
Oral Prst-TRS	_____	\$ 75.00	_____
Mtg Exp	_____	\$ 500.00	_____
Report	_____	\$ 75.00	_____
Response TRS	_____	\$ 75.00	_____
RAB Present	_____	\$ 75.00	_____
Mtg. Exp	_____	\$ 500.00	_____
		TOTAL	_____

BPA F41622-98-A-5881

Request Date: 15 Jul 05

Semiannual Compliance Plan Report

Geomatrix

TASK	HOURS	RATE	AMOUNT
Attend Preperf Mtg Mtg Exp	<u>2</u>	\$ 115.00	<u>230⁰⁰</u>
Develop Sched	<u>1</u>	\$ 115.00	<u>115⁰⁰</u>
Tech Review	<u>12</u>	\$ 115.00	<u>1380⁰⁰</u>
Oral Prst-TRS Mtg Exp	<u>4</u>	\$ 115.00	<u>460⁰⁰</u>
Report	<u>8</u>	\$ 115.00	<u>920⁰⁰</u>
Response TRS	<u>4</u>	\$ 115.00	<u>460⁰⁰</u>
RAB Present Mtg. Exp	<u>4</u>	\$ 115.00	<u>460⁰⁰</u>
		TOTAL	<u>\$ 4025⁰⁰</u>

BPA F41622-98-A-5884

Request Date: 15 Jul 05

Semiannual Compliance Plan Report
Neathery

TASK	Hours	Rate	Amount
Attend Preperformance meeting	<u>2.00</u>	<u>\$90.00</u>	<u>\$180.00</u>
Develop Schedule	<u>1.00</u>	<u>\$90.00</u>	<u>\$90.00</u>
Tech Review	<u>30.00</u>	<u>\$80.00</u>	<u>\$2,400.00</u>
	<u>5.00</u>	<u>\$135.00</u>	<u>\$675.00</u>
Oral Presentation to TRS	<u>3.00</u>	<u>\$90.00</u>	<u>\$270.00</u>
Report Preparation	<u>8.00</u>	<u>\$80.00</u>	<u>\$640.00</u>
Prepare Response to TRS	<u>3.00</u>	<u>\$80.00</u>	<u>\$240.00</u>
Presentation to RAB	<u>3.00</u>	<u>\$90.00</u>	<u>\$270.00</u>
		TOTAL	<u>\$4,765.00</u>

Final
Former Kelly Air Force Base (AFB) BRAC Cleanup Team (BCT)
9 August 2005 Meeting Minutes

The meeting was conducted beginning at 1 p.m. on 9 August 2005 at the Air Force Real Property Agency Division C – Kelly (AFRPA/DC-K) office in San Antonio, Texas, Conference Room No. 1. BCT members and support personnel attendance status is shown below.

Name	Organization	Present	Absent
BCT Members			
Norma Landez	AFRPA/DC-K	X	
Gary Miller	Environmental Protection Agency (EPA) / Region 6		X
Mark Weegar	Texas Commission on Environmental Quality (TCEQ) (Austin)	X	
Support Staff and Other Attendees			
Don Buelter	AFRPA/DC-K	X	
Charlie Matthews	AFRPA/DC-K	X	
Walter Peck	AFRPA/DC-K	X	
Greg Lyssy	EPA/Region 6	X	
Abbi Power	Texas Commission on Environmental Quality (TCEQ)		X
Michael Chapa	AFRPA/DC-K (TEAM Integrated Engineering, Inc. [TEAM])	X	
Cassie Kalinex	TCEQ/Region 13 Intern	X	
Amy Whitley	AFRPA/DC-K (TEAM)	X	
Ron Davis	Booz Allen Hamilton	X	

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1.	Landez, N.	Davis, R.	Zone 2 and 3 CMS	Review of proposed revisions to the Draft Final Zone 2 and 3 Corrective Measures Study.	Yes	Draft responses to TCEQ and EPA review comments on the Draft Final Zone 2 and 3 Corrective Measures Study (CMS) were discussed. The following clarifications were requested by TCEQ and EPA: Comment/Response #6: TCEQ requested further elaboration on how the dense non-aqueous phase liquid (DNAPL) recovery wells at Site MP were redeveloped, i.e. when and how? AFRPA indicated they will elaborate on redevelopment efforts in the response to the comment and in the revised CMS.

August 9, 2005
Technical Review Subcommittee (TRS) Meeting
of the Kelly Restoration Advisory Board (RAB)
Environmental Health and Wellness Center
911 Castroville Road
San Antonio, Texas 78237

DRAFT Meeting Minutes

RAB Community Member Attendees:

Mr. Robert Silvas, Community Co-chair
Ms. Esmeralda Galvan
Mr. Rodrigo Garcia, Jr.
Ms. Coriene Hannapel
Mr. Nazirite Perez
Mr. Armando Quintanilla
Mr. Sam Murrah, alternate for Mr. Michael Shengman

RAB Government Member Attendees:

Mr. Gary Martin, Greater Kelly Development Authority (GKDA)
Mr. Greg Lyssy, Environmental Protection Agency (EPA) Region VI
Ms. Melanie Ritsema, San Antonio Metropolitan Health District (SAMHD)
Mr. Mark Weegar, Texas Commission on Environmental Quality (TCEQ)

Other Attendees:

Mr. Don Buelter, Air Force Real Property Agency (AFRPA)
Ms. Sonja S. Coderre, AFRPA
Ms. Kyle Cunningham, Public Center for Environmental Health
Ms. Cassie Kalin, TCEQ
Ms. Linda Kaufman, Environmental Health and Wellness Center (EHWC)
Ms. Kelley Kravitz, AFRPA Contractor
Ms. Norma Landez, AFRPA
Ms. Martha A. Modugno, Community Member
Mr. Jerry Needham, San Antonio Express-News
Ms. Abbi Powers, TCEQ
Ms. Heather Ramon-Ayala, AFRPA Contractor
Dr. David Smith, Facilitator
Ms. Linda Ward, Community Member
Mr. David Yanez, Office of Texas Senator Leticia Van de Putte, District 26

The meeting began at 6:35 p.m.

I. Introduction – Dr. David Smith

Dr. David Smith began the meeting by welcoming RAB members and other attendees.

II. Administrative – Ms. Norma Landez/Ms. Sonja Coderre

Final
Former Kelly Air Force Base (AFB) BRAC Cleanup Team (BCT)
9 August 2005 Meeting Minutes

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1. (cont.)	Landez, N.	Davis, R.	Zone 2 and 3 CMS	Review of proposed revisions to the Draft Zone 2 and 3 Corrective Measures Study.	Yes	<p>TCEQ also asked if unneeded or un-restorable wells will be plugged and abandoned. AFRPA indicated well development or plugging will be conducted based on final selected remedies and the success/failure of redevelopment. Unneeded and unproductive wells will be removed and plugged.</p> <p>Comment/Response #7: TCEQ requested clarification as to why the calibration fluid was not considered a contaminant of concern (CoC) at the Building 348 OWS. AFRPA responded that calibration fluid (a jet fuel-type mixture) itself was not considered a CoC. CoCs considered in the CMS are limited to the individual chemical components of the fluid identifiable through laboratory analysis, such as total petroleum hydrocarbons (TPH). Volatile organic compound (VOC) and semi-volatile organic compound (SVOC) analytical suites utilized for samples at the Building 348 OWS indicate the only CoC associated with the Building 348 OWS is tetrachloroethylene (PCE). The calibration fluid was not sourced by the OWS at Building 348. AFRPA indicated they had interpreted the comment to be directed toward providing clarification regarding the difference between the text and table of the CMS and that a discussion of TPH as a CoC related to the calibration fluid release was addressed elsewhere in the report. The response to the comment was therefore phrased to address correcting the table heading so as to be consistent with the text of the CMS. AFRPA indicated revisions to the text of this section of the CMS were being considered for clarification.</p> <p>Comment/Response #13: TCEQ indicated the problem with the discussion of Building 348 in the CMS is the fact there is a NAPL (calibration fluid) floating on the shallow groundwater, however the PCE is the only CoC discussed. How will the NAPL be recovered? AFRPA responded that the specific action at Building 348 OWS is to address the PCE contamination in the soil, however the installation of passive bailers is recommended in all alternatives proposed for groundwater at Building 348 to address NAPL found in monitoring wells</p>

Final
Former Kelly Air Force Base (AFB) BRAC Cleanup Team (BCT)
9 August 2005 Meeting Minutes

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1. (cont)	Landez, N.	Davis, R.	Zone 2 and 3 CMS	Review of proposed revisions to the Draft Zone 2 and 3 Corrective Measures Study.	Yes	<p>outside of the Building 348 OWS area. The EPA representative asked if SVE had been considered for treatment. The AFRPA responded no, however a bio-slurper system had been installed in the area, but was ineffective because of fluctuating groundwater levels. The EPA representative asked how thick the NAPL layer is. The AFRPA responded it is relatively thin (less than 1.0 foot in total thickness). The AFRPA noted a skimmer was installed prior to the bio-slurper, but was also ineffective in NAPL removal. The AF believes the best method for NAPL removal is passive bailers, because of the minimal amount of NAPL present.</p> <p>Comment/Response #14: TCEQ indicated the AF response did not properly address the comment, in that it was still unclear why the AF did not select the cheaper, quicker alternative. The AFRPA responded that the initial comparative analysis of remedial alternatives over-rated Electric Resistive Heating (ERH) as a remedy as it did not accurately account for the limitations of the method to address dissolved-phase chromium impact. AFRPA concurred that this was not clearly presented in the draft Response to Comment and indicated it will revise the response and the CMS as appropriate to address this issue.</p> <p>Comment/Response #17: TCEQ expressed a previous understanding that the referenced DNAPL impact would be excavated and did not see the reason for further evaluation of alternatives. The AFRPA responded the TCEQ recommendation to excavate the soils at Site MP is being considered. However the earliest funding for this alternative would be available in 2008, with a potential funding would not be available until 2010. The TCEQ asked if the \$13.1 million cost for the preferred remedy identified within the CMS had already been expended at the site. The AF responded, no, that dollar amount included future operation and maintenance of the extraction and groundwater recovery system currently in place.</p>

Final
Former Kelly Air Force Base (AFB) BRAC Cleanup Team (BCT)
9 August 2005 Meeting Minutes

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1. (cont.)	Landez, N.	Davis, R.	Zone 2 and 3 CMS	Review of proposed revisions to the Draft Zone 2 and 3 Corrective Measures Study.	Yes	<p>AFRPA inquired whether the Corrective Measures Implementation Work Plan (CMI WP) could include a schedule indicating the timing of the implementation of the final remedy would be contingent upon availability of funds, meanwhile keeping the interim system operational. The TCEQ indicated this would be acceptable provided existing source control was maintained up to implementation of the final remedy.</p> <p>Comment/Response #19: The TCEQ indicated the CMS should be revised to indicate further evaluation of soil vapor associated with chlorinated solvents in the northwest corner of Building 360 will be conducted and the scope of that evaluation.</p> <p>Further review of the AFRPA response to TCEQ and EPA comments will be made by the TCEQ this week and any further concerns regarding AFRPA responses will be forwarded to AFRPA.</p>
2.	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p>Zone 2 – Sampling of the monitoring wells at the Zone 2 permeable reactive barrier (PRB) near Leon Creek indicates the PRB is working as intended. Concentrations in all but one down gradient well are below detectable concentrations (ND), with one well exhibiting detectable concentrations below the applicable maximum contaminant level (MCL). Samples collected from the hydrogen releasing compound (HRC) injection points indicate chromium concentrations are ND, with the exception of one point located near a groundwater extraction well. Additional HRC injection is planned within the Zone 2 area.</p> <p>Zone 4 - Projected date to begin injection of iron in the wells at the UPRR yard is August 23. Further injection of HRC is planned for two areas in Zone 4.</p> <p>Zone 5 – Additional injection of HRC in the Building 1414 area is planned.</p>

Final
Former Kelly Air Force Base (AFB) BRAC Cleanup Team (BCT)
9 August 2005 Meeting Minutes

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
3.	Landez, N.	Zone Managers	Pending Document Submittals	Review of documents to be submitted for regulatory review within the next 90 days; Status of documents already in review.	Yes	The TCEQ indicated Trustee Agency comments on the Final Eco-Risk Assessment Report are anticipated by the end of October 2005. EPA indicated their lead ecological risk assessor would like to schedule a meeting or teleconference with all interested parties prior to submitting comments on the report to the Air Force. The TCEQ indicated they would initiate the appropriate coordination to execute the meeting. AFRPA requested as much up front notice on the meeting requirements to coordinate attendance by their EcoRisk contractor.
4.	Landez, N.		Miscellaneous		Yes	AFRPA inquired whether the EPA had begun their review of the 5 Year Review submitted in mid-July. The EPA responded that review of the document had not been started and asked what timeline AFRPA is trying to meet. AFRPA requested any review comments be provided to the Air Force by August 17 th , 2005. EPA indicated an EPA HQ decision for future 5 year reviews would need to be made on Agency resource allocation priorities for document review and that the Agency may decline to review the future reports, since Kelly is not an NPL site. EPA indicated their response to the National Environmental Justice Advisory Council (NEJAC) study has been drafted and is waiting on the Division Director's approval and signature.

Final
Former Kelly Air Force Base (AFB) BRAC Cleanup Team (BCT)
19 July 2005 Meeting Minutes

The meeting was conducted beginning at 1 p.m. on 19 July 2005 at the Air Force Real Property Agency Division C – Kelly (AFRPA/DC-K) office in San Antonio, Texas, Conference Room No. 1. BCT members and support personnel attendance status is shown below.

Name	Organization	Present	Absent
BCT Members			
Norma Landez	AFRPA/DC-K	X	
Gary Miller	Environmental Protection Agency (EPA) / Region 6		X
Mark Weegar	Texas Commission on Environmental Quality (TCEQ) (Austin)	X	
Support Staff and Other Attendees			
Charlie Matthews	AFRPA/DC-K	X	
Walt Peck	AFRPA/DC-K	X	
Greg Lyssy	EPA/Region 6	X	
Michael Chapa	AFRPA/DC-K (TEAM Integrated Engineering, Inc. [TEAM])	X	
Abbi Power	TCEQ/Region 13	X	
Ellie Wehner	TCEQ (Austin)	X	
Maurice Cooper	Lackland 37 CES/CEVR	X	
Richelle Collingham	Booz-Allen Hamilton	X	
Greg Braddy	Weston Solutions, Inc. (WESTON)	X	
Cassie Kalinec	TCEQ/Region 13 Intern	X	
Ron Davis	AFRPA/DC-K (BAH)	X	

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1.	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p><u>Zone 1</u> The Lackland AFB Corrective Measures Study (CMS) contractor (WESTON) provided an update on the progress of the project. WESTON personnel indicated the human health risk assessment (RA) portion of the project was being initiated. WESTON had questioned the need for a full RA in association with implementation of a presumptive remedy and had contacted the TCEQ for guidance on the scope of the assessment.</p>

Final
Former Kelly Air Force Base (AFB) BRAC Cleanup Team (BCT)
19 July 2005 Meeting Minutes

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1. (cont)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p>WESTON indicated Mr. Kip Haney of TCEQ had provided recommendations on how to proceed with the RA as follows: (1) ask the TCEQ project manager (Mr. Mark Weegar) for concurrence on the idea that implementation of a presumptive remedy precludes the need for a RA; (2) conduct the RA based on an assumption of uncontrolled exposure to site contaminants; or (3) conduct the RA under potential exposure scenarios but without calculation of acceptable risk-based concentrations for residual site contaminants. WESTON provided a document summarizing salient RA issues under evaluation and their proposed means of addressing those issues for BCT members review.</p> <p>The TCEQ indicated that utilization of a presumptive remedy does not preclude the requirement for a human health risk assessment in the CMS process. Implementation of a presumptive remedy needs to include documentation of what the "uncontrolled" risk at the site would be without the corrective action. The TCEQ agreed in concept that the RA could likely be limited to the evaluation of risk levels from uncontrolled exposure if the presumptive remedy was to include capping and long term monitoring. The TCEQ indicated they would review the summary document and provide feedback to WESTON as appropriate.</p> <p>WESTON indicated they are also evaluating soil inorganic anaylte concentrations relative to established background concentrations for the former Kelly AFB to further refine the boundaries of landfill units requiring a remedial response.</p>

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Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1. (cont)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p>AFRPA added that inorganic analyte background concentrations for groundwater have also been determined for Kelly and should also be referenced in the development of the CMS.</p> <p>WESTON presented an isopleth map with approximate thicknesses of existing soil cover at the landfill units under evaluation in the CMS. In discussion of the existing cover, WESTON indicated that areas with sample results not exceeding default acceptable risk levels (i.e., TCEQ Risk Reduction Standard No. 2 [RRS2] concentrations) may require minimal, if any, reworking of surface cover.</p> <p>The TCEQ indicated that if it could be demonstrated that materials within a particular landfill section were not a threat to groundwater (i.e., no concentrations exceeding RRS2 groundwater protective [GWP] levels or no leachable chemical of concern [CoC] concentrations determined by the synthetic precipitate leaching procedure [SPLP]), the surface cover remedy requirements could be limited to actions to prevent ponding and to otherwise facilitate appropriate surface runoff at the site.</p> <p>The USACE representative asked if the above referenced scenario would preclude presumptive remedy requirements for those locations.</p> <p>The TCEQ responded that it would. Utilization of a presumptive remedy assumes site conditions present an unacceptable risk if not controlled in some fashion. If those levels of risk do not exist, then there is no requirement for implementation of a presumptive remedy. Historical assessments of the landfills may have not accurately characterized the residual risk at these units, resulting in the currently assumed requirement for implementation of a presumptive remedy.</p>

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1. (cont.)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p>The USACE asked if the landfill contents have been evaluated sufficiently to allow for closure without the presumptive remedy cover requirements. WESTON replied that this had not yet been done, but would be a consideration in the CMS evaluation.</p> <p>The TCEQ added that those areas not meeting requirements for closure under RRS2 would require a redundant cap.</p> <p>WESTON asked whether closure under RRS2 was still an option for the sites in consideration of TCEQ deadlines for transition of corrective action from the Risk Reduction Standards to the Texas Risk Reduction Program (TRRP).</p> <p>The TCEQ responded that the RRS2 sunset date does not apply in this case as the former base is managed under a RCRA permit stipulating use of the RRSs for cleanup. The TCEQ advised WESTON and LAFB to consider utilization of the contained-in policy to consolidate non-hazardous wastes and thereby limit areas requiring a baseline risk assessment and the subsequent implementation of a presumptive remedy.</p> <p>The EPA cautioned that "cherry-picking" and consolidating materials with higher contamination levels will require more rigorous characterization data collection and evaluation than that required to implement a presumptive remedy over a more encompassing area.</p> <p>WESTON asked if groundwater protective standards for soil must still be met if groundwater is being recovered from a particular landfill and there are no indications of contamination to groundwater from that unit.</p> <p>AFRPA indicated soils at the landfill must still be demonstrated to be protective of groundwater, i.e., less than RRS2 GWP or no leachable COC concentrations by SPLP. If so, then closure of the soils at the unit can be done separately from groundwater.</p>

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1. (cont.)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p>WESTON asked for guidance on how to address laboratory analytical data Quality Assurance / Quality Control issues for sample results obtained during investigations conducted at the site more than ten years ago. Data from these investigations may not meet current validation requirements.</p> <p>The TCEQ advised that the CMS process should ensure practical quantitation limits (PQLs) for historical sample results are commensurate with closure criteria for the site CoCs. Additional sampling may be required to resolve conflicts in the data set.</p> <p><u>Zones 2 and 3</u> The AFRPA's responses to comments received from TCEQ on the Zones 2 and 3 CMS are almost complete. AFRPA is evaluating revised waste classification assumptions which may lead to excavation and disposal as the selected remedy at Site MP.</p> <p>TCEQ inquired on the planned date for submittal of the revised document. AFRPA responded it currently planned to present proposed responses to comments for discussion during the August 2005 BCT meeting and to submit the revised CMS for formal review soon after.</p> <p><u>Zone 4</u> Completion of the permeable reactive barrier (PRB) within the Union Pacific Railroad alignment is still pending injection of iron media, anticipated to be done within three weeks of the meeting date.</p> <p>The Commercial Street PRB has been completed, including site surface restoration work.</p> <p><u>Zone 5</u> AFRPA is coordinating with the City of San Antonio to complete street repairs along the 34th Street PRB alignment.</p>

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Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1. (cont.)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	The Corrective Measures Implementation Work Plans and Compliance Plan modifications associated with the Zone 4 and Zone 5 CMS documents are in preparation and are expected to be submitted to the TCEQ in September 2005.
2.	Landez, N.	Davis, R.	EPCF RFI	Review of the RCRA Facility Investigation (RFI) report submitted for the former Environmental Process Control Facility (EPCF).	Yes	AFRPA staff presented a summary briefing on the methodology of the RFI process and the contents of the RFI report. The TCEQ asked if the report discusses non-EPCF related sources of contaminated groundwater underlying the former facility area. AFRPA responded that most groundwater CoCs present but not sourced from the EPCF are discussed in the report as emanating from Site E-3 or other up-gradient Zone 2 and 3 sources of contamination. An exception is the sporadically identified presence of chromium in groundwater. No definitive association with on or off-site sources has been made for chromium in groundwater at the EPCF. The only significant area of chromium impact to soil identified during the facility demolition and closure activities was sampled and did not exhibit leachable concentrations (based on SPLP analysis). Notwithstanding any potential for impact, the majority of chromium impacted soil was excavated. The TCEQ asked clarification on the extent of verification sampling conducted for process piping decommissioned on the various units closed. The report readily describes the process for closing main influent and effluent piping, but ancillary intermediate process piping was not adequately discussed. Was release detection sampling conducted for these intermediate process pipes?

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Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
2. (cont.)	Landez, N.	Davis, R.	EPCF RFI	Review of the RCRA Facility Investigation (RFI) report submitted for the former Environmental Process Control Facility (EPCF).	Yes	The AFRPA responded that the intermediate process piping in question would have varied in nature and would include above-ground, vaulted, and buried lines. Non-vaulted sub-grade lines would have been sampled as appropriate for release determination purposes. This sampling data is contained within the report; however, it could be revised to more readily present this information. The TCEQ asked if the indicated revisions could be made prior to TCEQ completing their review of the draft document. AFRPA offered to submit replacement pages and supplemental tables to include the referenced information in the current version of the report. TCEQ indicated that would be acceptable.
3.	Landez, N.	Zone Managers	Pending Document Submittals	Review of documents to be submitted for regulatory review within the next 90 days; Status of documents already in review.	Yes	The TCEQ asked for a list of units included on the former Kelly Notice of Registration (NOR) that are being requested for closure in the report. AFRPA indicated that the list would be provided. Attached list reviewed.
4.	N/A		Miscellaneous	Various issues raised in closing of meeting agenda.	Yes	The TCEQ indicated its guidance on conducting Findings of Suitability for Early Transfer (FOSET) has been finalized. The TCEQ added that the agency would prefer if the Air Force would not initiate the early transfer process until pending Compliance Plan modifications for Zones 4 and 5 have been completed. The EPA indicated an agency engineering forum meeting is to be held in San Antonio during October 2005. Interested attendees may request a tour of the former Kelly if the AFRPA can host them at that time.

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The meeting was conducted beginning at 1 p.m. on 14 June 2005 at the Air Force Real Property Agency Division C - Kelly (AFRPA/DC-K) office in San Antonio, Texas, Conference Room No. 1. BCT members and support personnel attendance status is shown below.

Name	Organization	Present	Absent
BCT Members			
Norma Landez	AFRPA/DC-K	X	
Gary Miller	Environmental Protection Agency (EPA)/Region 6		X
Mark Weegar	Texas Commission on Environmental Quality (TCEQ) (Austin)	X	
Support Staff and Other Attendees			
Ashley Allinder	AFRPA/DC-K	X	
Don Buelter	AFRPA/DC-K	X	
Michael Chapa	AFRPA/DC-K (TEAM Integrated Engineering, Inc. [TEAM])	X	
Walt Peck	AFRPA/DC-K		X
Abbi Power	TCEQ/Region 13	X	
Gary Martin	Greater Kelly Development Authority (GKDA)		X
Maurice Cooper	Lackland 37 CES/CEVR	X	
Klaus Guenther	HQ AETC/CEVR	X	
Ken Kebell	USACE	X	
Greg Braddy	Weston Solutions, Inc.	X	
Cassie Kalinec	TCEQ/Region 13 Intern	X	

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1.	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p><u>Zone 1</u> The Zone 1 Corrective Measures Study (CMS) contractor, Weston Solutions, Inc. (WESTON), distributed graphic figures presenting the boundaries of landfills to be addressed during the on-going project. WESTON indicated the landfill boundaries were revised following the review of sampling and analysis data obtained from the Kelly Environmental Resource Program Information Management System (ERPIMS) database and from site observations. The revised boundaries resulted in increases in the areas assumed to be addressed during the CMS process.</p>

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Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1. (cont)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p>The TCEQ requested WESTON to review the anticipated scope of the CMS project. WESTON indicated the first task would be to prepare a summary of historical investigations towards development of a conceptual site model (CSM). The CSM will be used to evaluate additional data requirements, if any, and the risk exposure assumptions to be utilized in the remedy selection process. The development of the CSM will include field data collection to "ground truth" assumed landfill conditions. Additional site data review will include evaluation of available historical aerial photographs and previously collected geophysical survey information. The CMS process will include a human health risk assessment. WESTON indicated a stand-alone risk assessment document may be submitted for agency review separately from the CMS report.</p> <p>The TCEQ indicated their file for Zone 1 includes correspondence to the Air Force relaying a TCEQ request for additional assessment activities in response to review of a circa 1995 Release Investigation (RI) report. The AFRPA added that Air Force responses to such a request would have likely been addressed during the Feasibility Study (FS) phase of the project. The AFRPA recommended that WESTON review the Kelly Administrative Record for potential correspondence from TCEQ (then the Texas Natural Resource Conservation Commission [TNRCC]) related to review of the 1995 RI and for possible AF responses to comments on the RI within the appendices of a later FS report. The TCEQ representative indicated that any correspondence related to the 1995 RI review in the Agency file would be provided via fax to WESTON.</p> <p>WESTON continued discussions of their preliminary review of site conditions and current assumptions associated with development of the CMS. For evaluation of corrective actions, landfill areas have been categorized by the types of wastes contained (construction debris, municipal solid waste, hazardous waste) which will dictate final cover requirements.</p>

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Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1. (cont.)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p>WESTON anticipates closing contiguous landfill areas under a single Risk Reduction Standard, but with potentially different cover types based on the types of waste contained. WESTON's current assumptions for addressing the Landfill 12 "Drum Disposal Area" indicate costs for excavation and off-site disposal of the drums would exceed a workable portion of the project budget. The TCEQ inquired on the factors influencing the high cost for the alternative. WESTON replied that management of the drums and associated contaminated environmental media as hazardous waste would be prohibitively expensive. Excavation of the drums would necessarily include de-watering, with recovered groundwater/leachate also requiring treatment as hazardous waste prior to discharge. Further, the excavation process would require significant diversion of surface water flow (storm water drainage) at the site. The TCEQ inquired if the USACE representative was familiar with a similar drum removal project conducted at Carswell AFB, TX, conducted at a significantly lower cost than that currently estimated by WESTON. The USACE representative indicated that the Carswell project was conducted through the Corps of Engineers, but he was not aware of the project specifics. The USACE indicated it would attempt to acquire information on the execution and cost of the project to provide to WESTON.</p> <p>The AETC representative inquired if multiple landfill units would be addressed with the construction of a single cap if the nature of their contained wastes was of a compatible nature. WESTON replied that this was generally the plan, with the exception of some units potentially needing to be addressed earlier than others due to Air Force IRP program last remedy in place (LRIP) requirements. The TCEQ inquired how WESTON would address the proposed breaks in the type of cover constructed over abutting portions of the landfills. WESTON indicated that technical issues associated with preventing migration/infiltration from areas of less rigorous capping requirements (i.e., construction debris) to those with more robust cover (i.e., haz waste) are currently being evaluated.</p>

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1. (cont.)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p>The currently anticipated solution consists of the construction of "anchor trenches" between varying cover types.</p> <p>AFRPA advised that potential maintenance requirements of sanitary sewer lines within the landfill areas should be addressed in the final remedy selection and design. WESTON acknowledged the concern and indicated this and other requirements associated with existing site conditions (specifically citing surface water flow diversion to protect cap integrity) would be addressed as appropriate. Other currently evaluated alternatives within the CMS include replacement of the groundwater recovery well array with a recovery trench and installation of a permeable reactive barrier (PRB) to prevent breakthrough of contaminants to down gradient areas. Landfill boundaries currently being compromised by erosion associated with the Leon Creek stream channel will also be addressed by implementation of the final remedy.</p> <p>The TCEQ recommended evaluating potential economies in cap construction by consolidation of non-hazardous wastes under the Contained-In Policy. The TCEQ advised that any changes to monitoring well locations resulting from implementation of the final remedies need to be captured within the associated Class 3 Compliance Plan modification.</p> <p>AFRPA and TCEQ advised WESTON to return to the BCT to obtain "heading checks" from the team throughout the CMS process as more definitive site and remedy specific data was available for discussion.</p> <p>Zones 2 and 3 The TCEQ inquired if AFRPA had any questions on the Agency's recently provided review comments on the Zone 2 and 3 CMS document. The AFRPA indicated responses to the TCEQ comments were in preparation. Based on comments</p>

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I. (cont.)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p>relating to waste classification, AFRPA indicated the CMS may be revised to indicate excavation with off-site disposal as the preferred alternative for Site MP. The TCEQ suggested revisiting assumptions for waste classification throughout the CMS document to ensure consistency between different environmental media affected by the same source and to verify accurate designation of listed and characteristically hazardous waste. The AFRPA inquired if the TCEQ would like to discuss the Air Force's proposed responses in a BCT meeting prior to submittal back to the Agency. The TCEQ indicated that would be at the discretion of the Air Force, but it was not necessarily required.</p> <p><u>Zone 4/Off-base</u> AFRPA inquired if responses to TCEQ comments on the Zone 4 CMS relating to potential indoor volatile organic compound (VOC) vapor exposure could be addressed within a separate submittal from the revised CMS document. The TCEQ indicated this would be acceptable.</p> <p>Reactive media injection equipment for construction of the Union Pacific Railroad PRB is still in repair. The estimated completion date for the barrier construction is July 2005. Surface restoration associated with the construction of the Commercial Street PRB is in process.</p> <p><u>Basewide</u> AFRPA is in the process of removing redundant Compliance Plan groundwater monitoring wells and otherwise unneeded wells located in City of San Antonio (CoSA) right-of-way areas. On a related note, the TCEQ indicated that correspondence associated with closure of wells in the 1100 Area (Zone 5) of former Kelly would be forthcoming.</p> <p>AFRPA's response to regulator comments on the Basewide Ecological Risk Assessment are being prepared and should be out for final regulator review by late June or early July 2005.</p>

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Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
2.	Landez, N.	Zone Managers	Pending Document Submittals	Review of documents to be submitted for regulatory review within the next 90 days; Status of documents already in review.	Yes	The list of documents planned for regulatory review within 90 days of the meeting date (attached) was reviewed. Although not on the list, AFRPA indicated that the Semi-Annual Compliance Plan report would be submitted for TCEQ review in July 2005.
3.	Landez, N.		DSMOA	Review of TCEQ's request for additional funds under the Defense and State Memorandum of Agreement (DSMOA)	Yes	The AFRPA indicated a two-year execution plan would have to be developed for TCEQ funding under the existing cooperative agreement. The TCEQ concurred but cautioned that the Cooperative Agreement does not provide for a "line item review/approval" of proposed TCEQ costs for program review support.



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

AFRPA/DC-Kelly
143 Billy Mitchell Blvd Ste 1
San Antonio TX 78226-1816

Dear Kelly Restoration Advisory Board Members

The following are read-ahead materials for the upcoming Kelly Technical Review Subcommittee (TRS) meeting 13 September 2005, 6:30p.m. at the Greater Kelly Development Authority, 143 Billy Mitchell Blvd., Bldg. 43, Suite 6, San Antonio, TX 78226. The meeting will begin in the GKDA Conference Room, followed by a chartered bus tour of various cleanup sites at the former Kelly Air Force Base (AFB).

The first thirty minutes of the TRS meeting will be devoted to the selection of a new TAPP contractor. The meeting will adjourn at 7:00p.m. At that time, all interested parties will be invited to board a bus in the GKDA parking lot. The Kelly Restoration Advisory Board (RAB) has expressed a desire to educate new RAB members about the various cleanup technologies being used at Kelly. This tour will be an excellent opportunity for the community to become familiar with these cleanup technologies first hand. In order to see as many sites as possible prior to the loss of sunlight, this will be a driving window tour with the exception of the final stop at the groundwater treatment plant. There will be a 30-minute walking tour of the groundwater treatment plant to experience the cleanup process in person.

The following materials are included for your review prior to the meeting:

- September TRS agenda
- TAPP contractor information
- Remediation tour itinerary
- New co-chair library documents

If you have questions regarding the materials, please contact the Public Affairs Officer Sonja Coderre at (210) 925-0956.

TAPP Budget Update

Beginning Amount **\$100,000.00**

Fiscal Year	Project/Document Name	Contractor	Amount
1998	ATSDR Report (Water)	University of Maryland	\$9,706.00
1998	1997 Base-wide Remediation Assessment	Clearwater Revival	\$6,975.00
1998	OU-2 Workplan	Neathery Environmental	\$5,145.00
1999	Zone 3 Corrective Measures Study Addendum	Clearwater Revival	\$6,375.00
1999	Remedial Investigation of Zone 4 OU-2	Neathery Environmental	\$6,195.00
1999	Final Zone 5 Corrective Measures Study	Geomatrix	\$3,617.50
2000	Shallow Groundwater Report	Geomatrix	\$5,572.50
2000	Site S-8 Draft Final Corrective Measures Investigation	Neathery Environmental	\$5,660.00
2000	Site MP Draft RCRA Facility Investigation	Clearwater Revival	\$5,925.00
2001	Zone 3 RCRA Facility Investigation	Clearwater Revival	\$5,775.00
2001	Zone 4 Corrective Measures Study	Geomatrix	\$8,390.00
2001	ATSDR Health Assessment	University of Maryland	\$7,428.00
2003	(Mod-01) Additional Travel Expenses for Presentation to RAB	Clearwater Revival	\$500.00
2003	Zone 2/3 Correctives Measures Study	Neathery Environmental	\$5,570.00
2003	ATSDR Air Emission Study	University of Maryland	\$8,366.00
2005	2005 Semiannual Compliance Plan	TBD	TBD
		Total Spent to Date	\$91,200.00
		Remaining Balance	\$8,800.00

STATEMENTS OF OBJECTIVES (SOO)
REVIEW JANUARY 2005 SEMIANNUAL COMPLIANCE PLAN REPORT

1.0 GENERAL

1.1 Scope

This task is to review the January 2005 Semiannual Compliance Plan Report for the former Kelly Air Force Base (AFB), focusing on the off-base impacts from Zones 2, 3, 4, and 5, including an identification of gaps in the location of monitoring wells, and identification of any trends in the contamination, providing a layperson's explanation of the 2004 annual shallow groundwater assessment.

1.2 Background

The compliance plan report documents the results of the annual groundwater sampling conducted at the former Kelly AFB in San Antonio, Texas. The former base conducts annual assessments of the shallow groundwater in accordance with the Texas Commission of Environmental Quality (TCEQ) issued Compliance Plan (CP-50310), dated on June 12, 1998. The annual assessment is used to determine the effectiveness of ongoing remedial activities in improving the quality of groundwater in the surficial (shallow groundwater) aquifer. The annual groundwater assessments began in 1994. The report describes current remedial activities, summarizes results of groundwater data collected during 2004, and evaluates these results with respect to historical data collected since 1994. In addition to these data, the analysis for the 2004 assessment considers site hydrogeology, including groundwater and surface water interaction.

1.3 Objectives

1.3.1 The contractor shall furnish all professional non-personal service labor, management, supervision, tools, materials, equipment, transportation, mailings, and reproductions, unless specified herein, for the assigned tasks issued against this Blanket Purchase Agreement.

1.3.2 The contractor shall provide technical assistance to the Restoration Advisory Board (RAB) and RAB Technical Review Subcommittee (TRS) by interpreting and translating the data in the compliance plan report.

1.3.2.1 The following specific tasks may be required for this project:

- Attend a pre-performance meeting
- Develop and submit a schedule for completion of the work
- Conduct a technical review of the compliance plan report
- Conduct an oral presentation of the report's conclusions at a TRS meeting
- Provide a review of the compliance plan report in layman's terms
- Provide a response to TRS comments, either orally or in writing

- Present the final report at a RAB meeting
- Participate in teleconference call

1.4 Guidance and Compliance Documents

All assessments and recommendations shall comply with all Federal, State, and local environmental laws and regulations including, but not limited to applicable portions of the statutes and regulations cited below. The contractor shall be provided with the Compliance Plan Report; however, the contractor is responsible for obtaining all public documents as needed based on the individual tasks issued against this agreement. Examples of the types of documents that may be required are listed.

- Kelly Permit HW-50310 and Compliance Plan CP-50310, 12 June 1998, and subsequent Class 3 Modifications.
- Installation and Closure of Shallow Aquifer Wells and Soil Borings on Kelly Air Force Base Technical Design specifications (TDS), December 1998.
- Final Quality Program Plan 2004 Compliance Program/Groundwater Monitoring, April 2004.
- Final Kelly AFB Basewide Quality Assurance Program Plan and Sampling and Analysis Plan, August 1999.

2.0 PROGRAM MANAGEMENT

2.1 Background Data/Information Review

2.1.1 The Air Force Real Property Agency (AFRPA) shall provide the contractor, where available, all pertinent and available background information concerning this task order. The contractor may be required to review/obtain additional background data information as required for the performance of the required services.

2.1.2 To accommodate the Air Force's remediation schedule, the contractor and the Air Force shall agree on a schedule or timeline for this task based upon the hours agreed on between the contracting officer and the contractor at time of award of the task. The contractor shall be required to meet the required timeline. Any extension of time must be agreed to by the AFRPA and RAB, and approved in writing by the Contracting Officer.

2.2 Meetings

2.2.1 Pre-Performance Conference – A pre-performance conference shall be held after the award of the order and prior to commencement of the work at a time, place and date specified by the Contracting Officer, as soon as the Compliance Plan report is received by the Air Force. Discussions at the meeting shall include the development of a mutual understanding relative to issuing task orders, scheduling and administering the work.

2.2.2 Contractor is invited to attend TRS meetings (normally held the second Tuesday of February, March, May, June, August, September, November, and December) and RAB meetings (normally held the third Tuesday of January, April, July and October).

3.0 PROJECT EXECUTION

3.1 Specific Requirements

3.1.1 Technical Review Report: This requires a review of the specific report and the applicable documents to be reviewed. The contractor is tasked with evaluating the report with respect to current environmental actions by the Air Force, assessing the completeness of the reports and adequacy of proposed or current actions, and making recommendations for future actions.

3.1.1.1. The written report shall include a defense of the process for making the determinations and an evaluation of the levels of confidence in the recommendations. The report need not be lengthy – an executive summary format is desirable. It must be written in layman's terms, so the RAB shall easily be able to communicate the findings to the community, if necessary.

3.1.1.2 All submittals must be double-sided, 100% post-consumer, recycled paper.

3.1.2 Technical Oral Presentation: This task order involves presenting the findings to the members of the TRS at a regularly scheduled TRS meeting time, followed by presenting a final presentation to the RAB at a regularly scheduled RAB meeting time. A firm date for these meetings shall be scheduled at the time the order is placed. TRS meetings are normally held the second Tuesday of February, March, May, June, August, September, November, and December at 6:30 p.m. TRS meetings are usually held at the Environmental Health and Wellness Center, 911 Castroville Road, San Antonio, Texas. RAB meetings are normally held on the third Thursday of January, April, July, and October at 6:30 p.m. at Kennedy High School, 1922 South General McMullen, San Antonio, Texas.

3.1.3 Response to Comments: Following the review of the written report and/or oral presentation, RAB members may have comments they wish addressed. The Contractor shall provide a written response to each question from the RAB, if so stated in this task order. Comments received before the oral presentation may also be delivered verbally at the presentation.

3.2 Public Affairs

The contractor shall not make available to the news media, nor make public disclosure of any data resulting from this contract during the performance of this contract. During the performance of this contract, the contractor shall refer all press or public contacts to the DoD co-chair. The documents produced and a transcription of the RAB presentation shall be placed in the Administrative Record and Information Repository by the Air Force. After completion of all requirements the public disclosure restriction shall be removed.

4.0 SUBMITTAL/DELIVERABLES

Each task order shall specify the required deliverables, with the quantities and time frame specified. Each written submittal shall include a cover letter stating the deliverable being provided and shall include the Blanket Purchase Agreement number and Task order number. The contractor shall provide a copy of the cover letter to the contracting officer. Copies of reports do not need to be provided to the contracting officer unless specified in the Task order. The details of the specific deliverables shall be identified with the award of the project.

5.0 CONTRACT SURVEILLANCE

5.1 Quality of Work

The contractor is solely responsible for the quality of the work. The Inspection of Services Clause applies to this order.

5.2 Inspection/Oversight Responsibilities and Acceptance

5.2.1 The Senior Representative of the former Kelly AFB is the Installation Co-Chair of the RAB. The Contracting Officer (C.O.) shall designate a C.O. Representative (COR) who shall act as liaison between the Contractor and the RAB. The Contracting Officer shall be notified of any conflicts and shall resolve any problems that cannot be mutually resolved between the Contractor, Installation Co-Chair, and the RAB Community Co-Chair, or designated representatives. A meeting of all parties, at no additional cost to the government, may be called by the Contracting Officer to discuss and propose solutions to resolve discrepancies.

5.2.2 The Contractor is advised that only the Contracting Officer can obligate the government or direct the contractor. The COR and the RAB members DO NOT have this authority. The contractor SHALL NOT EXCEED the total amount of any order awarded without prior written approval of the contracting officer

5.2.3 The COR, with the RAB's concurrence, shall certify acceptance at completion of the task.

6.0 POINTS OF CONTACT

A list of Points of Contact shall be available with the award of this task order.

BPA F41622-98-A-5881

Request Date: 15 Jul 05

Semiannual Compliance Plan Report

Geomatrix

TASK	HOURS	RATE	AMOUNT
Attend Preperf Mtg Mtg Exp	<u>2</u>	\$ 115.00	<u>230⁰⁰</u>
Develop Sched	<u>1</u>	\$ 115.00	<u>115⁰⁰</u>
Tech Review	<u>12</u>	\$ 115.00	<u>1380⁰⁰</u>
Oral Prst-TRS Mtg Exp	<u>4</u>	\$ 115.00	<u>460⁰⁰</u>
Report	<u>8</u>	\$ 115.00	<u>920⁰⁰</u>
Response TRS	<u>4</u>	\$ 115.00	<u>460⁰⁰</u>
RAB Present Mtg. Exp	<u>4</u>	\$ 115.00	<u>460⁰⁰</u>
	TOTAL		<u>\$ 4025⁰⁰</u>

BPA F41622-98-A-5882

Request Date: 15 Jul 05

Semiannual Compliance Plan Report

Clearwater Revival

TASK	HOURS	RATE	AMOUNT
Attend	_____	\$ 75.00	_____
Preperf Mtg Mtg Exp	_____	\$ 500.00	_____
Develop Sched	_____	\$ 75.00	_____
Tech Review	_____	\$ 75.00	_____
Oral Prst-TRS	_____	\$ 75.00	_____
Mtg Exp	_____	\$ 500.00	_____
Report	_____	\$ 75.00	_____
Response TRS	_____	\$ 75.00	_____
RAB Present	_____	\$ 75.00	_____
Mtg. Exp	_____	\$ 500.00	_____
		TOTAL	_____

BPA F41622-98-A-5884

Request Date: 15 Jul 05

Semiannual Compliance Plan Report
Neathery

TASK	Hours	Rate	Amount
Attend Preperformance meeting	<u>2.00</u>	<u>\$90.00</u>	<u>\$180.00</u>
Develop Schedule	<u>1.00</u>	<u>\$90.00</u>	<u>\$90.00</u>
Tech Review	<u>30.00</u>	<u>\$80.00</u>	<u>\$2,400.00</u>
	<u>5.00</u>	<u>\$135.00</u>	<u>\$675.00</u>
Oral Presentation to TRS	<u>3.00</u>	<u>\$90.00</u>	<u>\$270.00</u>
Report Preparation	<u>8.00</u>	<u>\$80.00</u>	<u>\$640.00</u>
Prepare Response to TRS	<u>3.00</u>	<u>\$80.00</u>	<u>\$240.00</u>
Presentation to RAB	<u>3.00</u>	<u>\$90.00</u>	<u>\$270.00</u>
		TOTAL	<u>\$4,765.00</u>

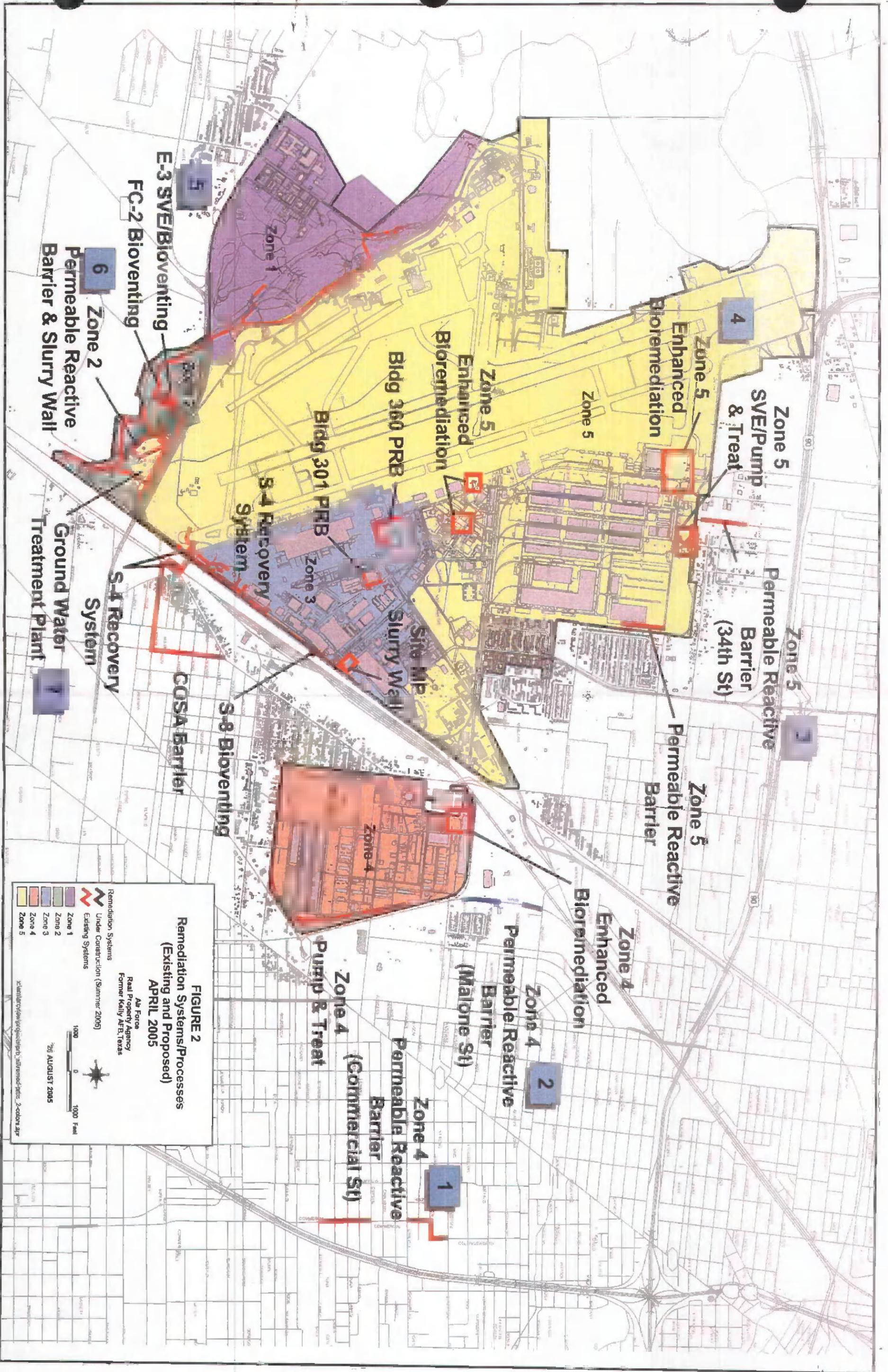


FIGURE 2
Remediation Systems/Processes
(Existing and Proposed)
APRIL 2005

Air Force
 Real Property Agency
 Former Kelly AFB, Texas

Remediation Systems
 Under Construction (Summer 2005)

Existing Systems

1000 0 1000 Feet
 26 AUGUST 2005

x:\entire\view\proj\delph\3d\ground.pict; 2-color; 24p

AUG 09 2005

BY:

Documents to the TRS/RAB

I, Robert Silvas, Co-chair of the Kelly Restoration Advisory Board, accept the following document(s) to be included in the Co-chair Library at the Environmental Health and Wellness Center. The document(s) will remain in the Co-chair library to allow fellow RAB members the opportunity for review. The documents will not be replaced if removed.

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Gail J. Boagle, Tema J Smith

<i>Robert Silvas</i>	<i>8/9/05</i>	<i>Adam Antwine</i>	<i>8/23/05</i>
Robert Silvas	Date	Adam Antwine	Date
RAB Co-chair		Installation Co-chair	

Provide copies to RAB and appropriate
of all documents.

COPY

PAT
COALITION SEEKING JUSTICE FOR PEOPLE
AFFECTED BY TOXINS WHILE WORKING AT OR
LIVING NEAR MILITARY INSTALLATIONS

319 West Kings Highway, San Antonio, Texas 78212-2831

July 29, 2002

Jeffrey Saitas
Executive Director
Texas Natural Resource Conservation Commission
c/o Office of the Chief Clerk
MC 105
TNRCC
P.O. Box 13087
Austin, Texas 78711-3087

RE: Kelly Air Force Base Compliance Plan for Site S-4 Groundwater
Class 3 Modification; Compliance Plan CP-50310

Dear Mr. Saitas:

The purpose of this letter is to submit the comments of the *Coalition Seeking Justice for People Affected by Toxins While Working at or Living Near Military Installations (PAT)* on the Compliance Plan referenced above. This organization is primarily made up of former KAFB workers and residents living in the areas contaminated by the hazardous substances released from KAFB. Several of our members live in Zone 5 and are affected by the proposed plan for clean up of site S-4 Groundwater. **The proposed plan is not technically complete and has failed to address numerous issues with regards to the contamination, which has migrated into the neighboring communities surrounding the former Kelly Air Force Base (KAFB) and the underlying Edwards Aquifer. Furthermore, this plan was developed without proper public participation as mandated by federal and state law.**

An independent review of the scientific studies used in determining the plan to be selected, was conducted by Dr. Catherine Squibb, who identified numerous flaws in the technical approach and the lack of significant data upon which to base the selection of the clean up method. *When these deficiencies were presented to the Technical Review Subcommittee of the Restoration Advisory Board, a TNRCC representative acknowledged that those deficiencies were real and the further testing would be required to validate the proposals for clean up. Air Force representatives also acknowledged that further testing and study would be done. The*

additional testing was proposed to be undertaken within the next 12 months. To approve the plan as presented is contrary to the admissions of the party responsible for the clean up and the agency mandated to regulate that clean up.

The proposed plan is based on computer modeling of the contamination and its migration patterns. That modeling is based on data that is incomplete and insufficient for the purpose for which it is being used. The deficiencies of the data are due in part to information that has been designated classified and therefore unavailable. Members of the ATSDR investigation team were frustrated in the preparation of their health impact reports because the data supplied by the Air Force had been in many cases redacted or considered classified. *This withholding of information is in direct conflict with Executive Order 12856 – Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements and its provisions for compliance without regard to the Standard Industrial Classification delineations that apply to federal facilities.*

The issue of the migration of contaminants from the shallow underground aquifer underneath KAFB and the surrounding neighborhoods into the Edwards Aquifer has not been resolved. To date all drinking water wells in the area have not been identified and capped. Evidence has been presented that there have been leaks from on base wells into the Edwards Aquifer. Presentations made to the San Antonio City Council regarding the likelihood of contaminant migration from the shallow underground aquifer underneath the adjacent communities were based on assumptions. It was assumed that the clay soil layer separating the aquifers is consistent in its thickness and characteristics. When these assumptions were challenged, the only response was to refer back to the model. To date there has been no resolution to the issues raised during those presentations, nor has there been any new data introduced to suggest that the model is correct. There has also been no answer to the fact that the chemicals at issue in the permit have migrated into the Edwards Aquifer, that evidence has not been refuted. *To propose a clean up plan of monitored natural attenuation for a city with one underground drinking source is unconscionable.*

The proposed clean up using monitored natural attenuation along with permeable reactive barriers and a few pump and treat stations is a weak attempt to appease the neighboring communities. *The cleanup process has not been "progressing adequately" as is required by state and federal laws.* While attention has been focused on the most volatile chemicals present in the contamination plumes, there has been little mention of the clean up of heavy metals and other more stable pollutants. The proposed permeable reactive barriers (PRB) may remove the volatile PCE and TCE chemicals, but they will not remove mercury or other heavy metals. These remaining pollutants will persist and continue to impact the community long after the proposed 25 year clean up period. Nothing is being done to address this portion of the contamination. Several alternative clean up processes have been introduced during Technical Review Subcommittee meetings that would be more protective of human health and the environment. None of these proposals has been given due consideration because of the cost involved. The Air Force is choosing economics over the health of the community. To approve that strategy is to act as a conspirator in the negative impact on the community.

Finally, the process for selecting a clean up plan for the shallow groundwater aquifer has violated the mandates of Executive Order 12898 regarding environmental justice in low-

income and minority communities. Public participation has been allowed at the convenience of the Air Force with no real partnership established. The atmosphere between the community and the Air Force has been adversarial and contentious, so much so that the EPA has recognized a valid Title VI complaint regarding this facility. Community members have been denied access to the real decision making processes. The administrative record for the clean up has been inaccessible and those documents that are available have been redacted to the point of being useless. CERCLA and Executive Order 12580 require development and maintenance of an administrative record when restoration is undertaken at a Department of Defense facility. One of the purposes of keeping the record is to provide "a means for keeping the public informed about clean up activities." There has not been compliance with this mandate. **This is not the partnership relationship that is mandated by federal law and outlined in the Defense Environmental Restoration Process.**

As you can see there are serious issues that have not been addressed in the development of the proposal in question. Those issues must be resolved before any further action may be taken in approval of the proposed plan. PAT requests a public hearing on the issues raised in these comments. PAT would like to receive copies of the responses to comments along with the Executive Director's decisions on the application. Please place our organization on the mailing list for all future public notices for this application. Also, please place our organization on the mailing list for any and all matters dealing with the activities at KAFB and the surrounding community. It is our hope that you and the TNRCC will address these comments in a meaningful way and work with the community to insure an aggressive, expeditious cleanup of our contaminated neighborhoods.

Respectfully,

Gail J. Beagle

Gail J. Beagle, President

Irma T. Smith

Irma T. Smith, member

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Margaret Hoffman, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 1, 2004

Ms. Gail Beagle, President
People Affected by Toxins (PAT)
319 W. Kings Hwy,
San Antonio, Texas 78212

Ms. Yolanda A. Johnson
3859 Bay Street
San Antonio, Texas 78237

Ms. Irma Smith
2420 McCullough, Suite 219
San Antonio, TX 78212

Re: Application of Kelly Air Force Base, Site S-4
Compliance Plan Modification

Dear Ms. Beagle, Johnson, and Smith:

The Executive Director of the Texas Commission on Environmental Quality (TCEQ or the "Commission") received letters from you on July 30, 2002, on behalf of PAT, an organization of former Kelly AFB workers and residents living near Kelly AFB. Your letters request a contested case hearing regarding a pending application by Kelly AFB which would authorize a final Corrective Action Program for the remediation of groundwater associated with releases from Site S-4 and would monitor the concentration of hazardous constituents in groundwater until compliance with groundwater quality standards has been attained. Site S-4 is located along the eastern boundary of Kelly AFB adjacent to the Union Pacific Railroad (UPRR) railyard. Site S-4 is in Zone 3 and is south and west of the larger Zone 4 plume which has migrated offsite on the east side of the Base.

The rules of the Commission provide that the Executive Director may request a group or association to provide an explanation of how the group or association meets the requirements of 30 TEXAS ADMINISTRATIVE CODE (TAC) § 55.205. Section 55.205(a) states that a group or association may request a contested case hearing only if it meets three requirements:

CHIEF CLERKS OFFICE

2004 SEP -7 PM 1:59

Kathleen Hartnett White, *Chairman*
 R. B. "Raiph" Marquez, *Commissioner*
 Larry R. Soward, *Commissioner*
 Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 7, 2004

LaDonna Castañuela
 Office of Chief Clerk
 TCEQ MC - 105
 P.O. Box 13087
 Austin, TX. 78711-3087

Re: Association Standing Letter of Inquiry
 United States Air Force, Kelly AFB
 Compliance Plan 50310
 DOCKET NUMBER-2004-0699-IHW

CHIEF CLERKS OFFICE

2004 SEP - 7 PM 1:59

15:00
 COMMISSIONER
 ON ENVIRONMENTAL
 QUALITY

Dear Ms. Castañuela:

As requested by the Office of the General Counsel, the Executive Director of the Texas Commission on Environmental Quality files an original and eleven copies of an Association Standing Letter of Inquiry. That letter was sent to assist in the development of his Response to Hearing Requests on the United States Air Force - Kelly Air Force Base (Kelly AFB) application for a Class 3 compliance plan modification for Site S-4.

The letter dated July 1, 2004, was sent to the three hearing requesters to identify any member in the association they represent that may be an affected person with standing to request a hearing in his or her own right.

To date, the Executive Director has not received a reply or any communication regarding this Association Standing Letter.

If you have any questions regarding this matter, please contact me at 512/239-0454.

Sincerely,


 Susan Jere White
 Environmental Staff Attorney

Enclosure

cc: Mailing List

Application of Kelly Airforce Base, Site S-4
Compliance Modification Plan
June 30, 2004
Page 3 of 3

Alternatively, if you do not wish to pursue a contested case hearing on the Site S-4 matter, you may withdraw your hearing request. We will need the signatures of all three signatories to the comment letter on any letter seeking to withdraw your hearing request.

If you have any questions about the ADR process, please contact Kyle Lucas (512) 239-0687.

Sincerely,



Susan Jere ~~White~~, Staff Attorney
Environmental Law Division
Phone (512) 239-0454
Fax (512) 239-0606

cc: Dianna Tillerson, Chief Clerk's Office
Richard L. Lowerre, Lowerre & Kelly, Attorneys at Law
Ms. Leslie Brown, Kelly AFB, Air Force Real Property Agency

**Kelly Restoration Advisory Board (RAB)
Technical Review Subcommittee (TRS)**

Kelly Remediation Site Tour
September 13, 2005, 7:00p.m. – 8:30p.m.

Remediation Tour Stops

STOP 1 – Commercial Street, Zone 4 (7:00 – 7:10)

The permeable reactive barrier (PRB) located at Commercial Street was installed in 2004. A PRB is an underground, flow through system that helps clean groundwater. PRB's have been installed at Kelly using (2) methods of installation:

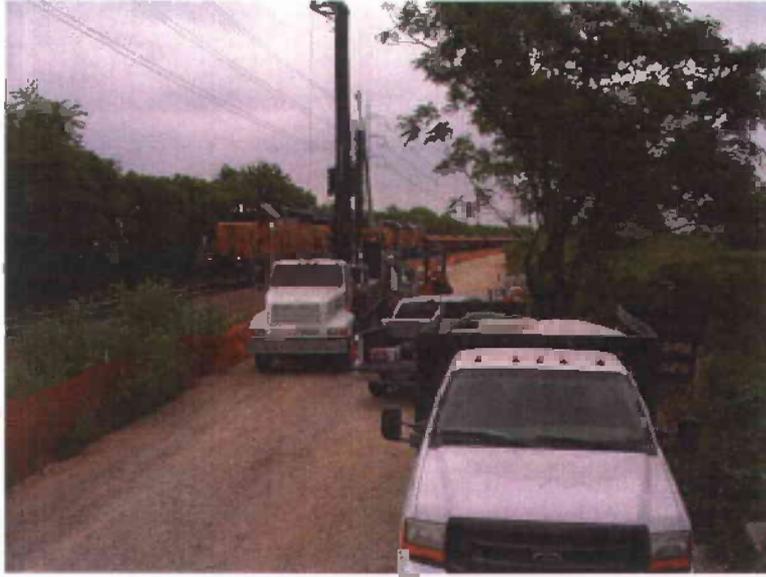
- 1) Trench method – A trench is excavated and then filled with sand and iron fillings.
- 2) Injection method – Injection wells are installed over the contaminated area, and an iron gel is injected into the ground creating the wall. The installation of the injection method is less intrusive to the surrounding area.

As contaminated groundwater passes through PRB, iron reacts with TCE and PCE and helps break them down. PRBs are not visible after installation.



STOP 2 – Malone Street, Zone 4 (7:10 – 7:20)

The Malone Street remediation site began construction in 2005, and will be the 18th remediation system in place. This location is a PRB site, and construction is expected to be completed by the end of September 2005.



STOP 3 – 34th Street, Zone 5 (7:20 – 7:30)

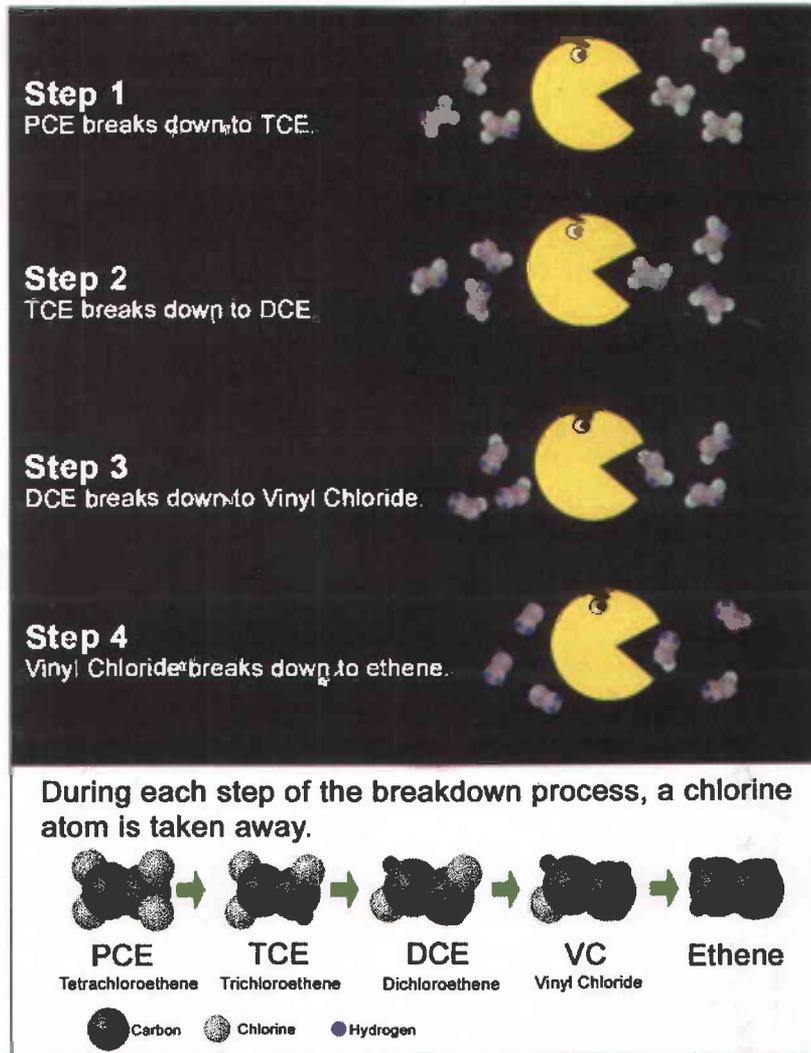
The 34th Street remediation site was installed in 2004, and is also a PRB.



STOP 4 – Enhanced bioremediation, Zone 5 (7:30 – 7:40)

The cleanup process at Stop 4 was completed in 2002, and uses enhanced bioremediation technology.

Through enhanced bioremediation, a vegetable oil-like substance is injected into the groundwater where contamination is present. Microorganisms which are naturally found below the surface “eat” the oil-like substance and breakdown the contaminants in the process.



STOP 5 – Permeable reactive barrier and slurry wall, Zone 2 (7:50 – 8:00)

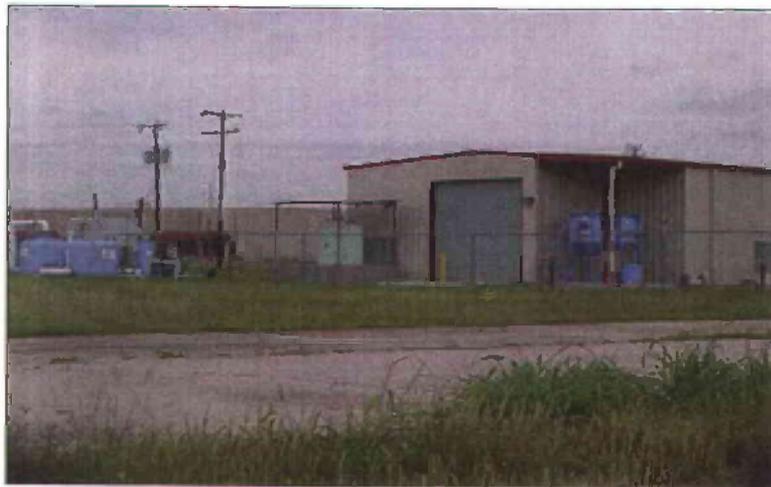
This cleanup remediation site was completed in 2004, and used both PRB and slurry wall technologies.

A slurry wall is a low-permeability material used to control the spread of contaminated groundwater. This method requires the use of heavy machinery and excavation. After excavating a narrow trench, typically 1.5 to 5 feet, the trench is then filled with an engineered fluid that provides chemical resistance and a physical underground barrier.

**STOP 6 – E-3, Zone 2 (7:40 – 7:50)**

Site E-3 was installed in 1998 and used (2) forms of cleanup technology.

- 1) Soil vapor extraction (SVE) – SVE involves the removal of harmful chemicals from the soil in the form of vapors. The vapors are removed from the ground through extraction wells by applying a vacuum to pull the vapors out.
- 2) Bioventing – This technology involves the use of extraction wells to circulate air into the ground to supply oxygen to naturally occurring microorganisms.



STOP 7 – Groundwater Treatment Plant (GWTP), Zone 2 (8:00 – 8:30)

The GWTP was completed in 1993 and uses a pump-and-treat technology. At the GWTP, groundwater is continually pumped out of the ground and treated at a rate of up to one million gallons a day. The treated groundwater is tested for safe contaminant levels and released into Leon Creek, or put to another beneficial use. The GWTP was installed on base to prevent contamination from spreading off base.



RECEIVED
AUG 09 2005
BY: _____

Documents to the TRS/RAB

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Gail J. Boagk, Tema J Smith

<u>Robert Silvas</u>	<u>8/9/05</u>	<u>Adam Antwine</u>	<u>8/23/05</u>
RAB Co-chair	Date	Installation Co-chair	Date

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of all documents.

COPY

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COALITION SEEKING JUSTICE FOR PEOPLE
AFFECTED BY TOXINS WHILE WORKING AT OR
LIVING NEAR MILITARY INSTALLATIONS

319 West Kings Highway, San Antonio, Texas 78212-2831

July 29, 2002

Jeffrey Saitas
 Executive Director
 Texas Natural Resource Conservation Commission
 c/o Office of the Chief Clerk
 MC 105
 TNRCC
 P.O. Box 13087
 Austin, Texas 78711-3087

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Respectfully



Gail J. Beagle, President



Irma T. Smith, member



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 1, 2004

Ms. Gail Beagle, President
People Affected by Toxins (PAT)
319 W. Kings Hwy,
San Antonio, Texas 78212

Ms. Yolanda A. Johnson
3859 Bay Street
San Antonio, Texas 78237

Ms. Irma Smith
2420 McCullough, Suite 219
San Antonio, TX 78212

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Compliance Plan Modification

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CHIEF CLERKS OFFICE

2004 SEP -7 PM 1:59

①

Kathleen Hartnett White, *Chairman*
R. B. "Raiph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 7, 2004

LaDonna Castañuela
Office of Chief Clerk
TCEQ MC - 105
P.O. Box 13087
Austin, TX. 78711-3087

2004 SEP - 7 PM 1: 59
CHIEF CLERKS OFFICE
COMMISSION ON ENVIRONMENTAL QUALITY

Re: Association Standing Letter of Inquiry
United States Air Force, Kelly AFB
Compliance Plan 50310
DOCKET NUMBER-2004-0699-IHW

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Sincerely,

Susan Jere White
Susan Jere White
Environmental Staff Attorney

Enclosure

cc: Mailing List

2

Application of Kelly Airforce Base, Site S-4
Compliance Modification Plan
June 30, 2004
Page 3 of 3

Alternatively, if you do not wish to pursue a contested case hearing on the Site S-4 matter, you may withdraw your hearing request. We will need the signatures of all three signatories to the comment letter on any letter seeking to withdraw your hearing request.

If you have any questions about the ADR process, please contact Kyle Lucas (512) 239-0687.

Sincerely,



Susan Jere ~~White~~, Staff Attorney
Environmental Law Division
Phone (512) 239-0454
Fax (512) 239-0606

cc: Dianna Tillerson, Chief Clerk's Office
Richard L. Lowerre, Lowerre & Kelly, Attorneys at Law
Ms. Leslie Brown, Kelly AFB, Air Force Real Property Agency

Community Feedback Form

We value your feedback regarding the Air Force's environmental cleanup at the former Kelly Air Force Base. Please take a moment to answer the questions below and return this form to the address provided on the opposite side.

During the past 12 months, have you...	Yes	No	Don't Know
Received by mail any information about the cleanup?			
Heard anything about the cleanup in the news?			
Talked to a friend or neighbor about the cleanup?			
Spoken or interacted with an Air Force representative?			

How familiar or unfamiliar are you with the environmental cleanup at Kelly?

Very Familiar Somewhat Familiar Somewhat Unfamiliar Very Unfamiliar

Please tell us how much you agree or disagree with the following statements:

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don't Know
The Air Force is being very open in its communications.						
The Air Force is very responsive to community concerns.						
The Air Force is providing useful information to me.						
I can easily understand information from the Air Force.						
The environmental cleanup is being done safely.						
The environmental cleanup is being done as quickly as possible.						
In general, the environmental cleanup is going well.						

During the next 12 months, how likely is it that you will do the following?

	Very Likely	Likely	Somewhat Likely	Not Very Likely	Not Sure
Read information about the cleanup.					
Talk to my neighbor(s) about the cleanup.					
Attend community meetings about the cleanup.					
Call the Air Force with questions about the cleanup.					
Write a letter to a news editor about the cleanup.					
Play an active role in representing my community's interests regarding the cleanup.					

AFRPA/DC-Kelly
143 Billy Mitchell Blvd., Suite 1
San Antonio, TX 78226-1816



Air Force Real Property Agency

The Former Kelly Air Force Base

(210) 925-0956 • Toll Free 1-866-725-7617 • www.afarpa.hq.af.mil

Kelly: Then and Now

For more than 80 years, the former Kelly Air Force Base provided military aviation, training, supply and maintenance services for the Air Force. Placed on the Base Closure and Realignment list in 1995, Kelly was partially realigned to Lackland AFB and the remainder closed July 13, 2001. Since then, the Air Force Real Property Agency has been conducting the environmental restoration and property transfer programs at Kelly. AFRPA works with the U.S. Environmental Protection Agency and Texas Commission on Environmental Quality to ensure contamination is cleaned up in order to transfer the property to the Greater Kelly Development Authority – the local redevelopment authority. Today Kelly operates as KellyUSA, a multi-use airport and rail-served business park.

The Environmental Program at Kelly

During Kelly's active years, the base was used primarily as a manufacturing and maintenance depot. While the Air Force employed the latest precautions to safely handle the many chemicals in use at the former base, long-term impacts were not known until after years of operating. As a result of approved waste-disposal practices during base operations, leaks and spills of jet fuel and chlorinated solvents used to degrease metal aircraft parts contaminated the soil and shallow groundwater on base and around Kelly.

In 1988, along Quintana Road, the Air Force first detected the contamination in the shallow groundwater. Since then, the Air Force has evaluated and implemented a variety of innovative cleanup techniques to remove and/or treat the contamination of the soil and shallow groundwater.

Systems designed to contain the plume were first installed to prevent additional migration of contaminants off the base. The Air Force then employed innovative technologies to remove contaminants such as using micro-organisms to break down chemicals; and using groundwater treatment plants to pump the contaminated water from the shallow zone, treat it and then discharge the treated groundwater into Leon and Six Mile creeks – the natural discharge areas for the shallow groundwater zone. The Air Force is currently installing the final groundwater remediation system, a permeable reactive barrier, on Malone Avenue. This PRB, like the six others installed throughout the Kelly area, is made of iron filings which react with the chemicals in the shallow groundwater, causing them to breakdown into less-harmful by-products.

The Air Force will continue to operate these cleanup systems until the shallow groundwater meets TCEQ's regulatory standards. TCEQ and EPA provide regulatory oversight of the Air Force throughout this process to ensure remedial actions are effective and



Iron filings injection method for the permeable reactive barrier on Commercial Street

continue until regulatory standards are met.

Drinking water for the Kelly community, as well as the city of San Antonio, comes from the Edwards Aquifer not the shallow groundwater zone. The shallow groundwater zone lies approximately 30 feet underground and the Edwards is approximately 1,500 feet below the shallow groundwater zone. The two aquifers are separated by approximately one-quarter-mile of impermeable clay, ensuring drinking water is safe from any Kelly contamination.

Addressing Health Concerns

Despite numerous studies unable to link past or present Kelly activities to the health concerns of the community, the Air Force entered into a cooperative agreement with the San Antonio Metropolitan Health District in 2002. The agreement provides \$5,000,000 in funding over a ten year period. Funding provided allows the Public Center for Environmental Health to develop and conduct health-related research studies. To date, PCEH has conducted several studies to monitor air for possible



The flag is lowered and folded for the last time at Kelly Air Force Base on July 13, 2001

contamination during environmental cleanup activities. PCEH also responded to community requests for a study to test homegrown produce for contaminants.

3 Kelly area fruits and nuts were determined safe to eat and no contamination was detected during Air Force construction and installation of four PRBs within proximity to the community that work to clean the shallow groundwater.

22 Additionally, the Air Force and SAMHID identified and decommissioned private shallow groundwater wells in the Kelly area. Although most residents used these private wells for agricultural purposes, 75 wells were plugged in order to ensure protection of human health and the environment throughout the community. The Air Force and SAMHID worked extensively to ensure community members understand the drinking water provided by the San Antonio Water System comes



A scientist examines homegrown tomatoes in the community during the First and First Study.

Join the Kelly Restoration Advisory Board!

Formed in 1994 the Kelly RAB facilitates public participation in the former Kelly AFB environmental cleanup program. The Kelly RAB consists of one representative from the Air Force, the U.S. Environmental Protection Agency, the Texas Commission on Environmental Quality, the Greater Kelly Development Authority and the San Antonio Metropolitan Health District, as well as 16 community members. Generally, each year 8 community member terms expire, allowing opportunity for members to seek reelection or new members to join the board. Kelly RAB community members are elected to serve two-year terms.



Community members tour the Groundwater Treatment Facility.

from the Edwards Aquifer.

The Environmental Health and Wellness Center, with funding provided by the Agency for Toxic Substances and Disease Registry, provides free health exams and information to community members. To date, nearly 2,000 free health screenings have been provided.

Reaching out to the Community

To ensure community members receive the most complete and timely information regarding the environmental and property transfer programs, the Air Force employs a number of outreach initiatives at the former Kelly AFB. Central to these is the Kelly Restoration Advisory Board. Created in 1994 to seek and promote community involvement in the Kelly cleanup program, the RAB

beginning in January and ending December of the following year. RAB community members serve voluntarily without compensation and are expected to review documents, make constructive comments and attend meetings.

Kelly RAB members have contributed to the Air Force's environmental cleanup program since 1994 by:

- Increasing community understanding
- Reviewing plans and documents
- Providing advice



Restoration Advisory Board members discuss reports prior to a meeting.

meets quarterly to discuss progress, provide input, review plans and suggest projects. RAB advice is factored into the environmental cleanup program. The Air Force also provides annual informational meetings to the surrounding community, partners with various community groups, gives tours and attends neighborhood association meetings.

Working Today for a Better Tomorrow

A key part of San Antonio's future, KellyUSA generates \$2.5 billion annually through a combined workforce of 12,000 jobs. With a total of 1,887 acres of former Kelly AFB land in reuse at KellyUSA and 96 percent of available industrial space currently under management of the Greater Kelly Development Authority, the development of KellyUSA is allowing new growth in southwest San Antonio.

Through open and ongoing involvement with the community and federal and state regulators, the implementation of innovative environmental cleanup technologies, property transfer and redevelopment and an unwavering commitment to protecting human health and the environment, the closure and redevelopment of the former Kelly AFB is a success story.

Acting as a resource for the community

Community members interested in joining the Kelly RAB should contact the Air Force Real Property Agency to obtain more information and a member application.

AFRPA/DC-Kelly
143 Billy Mitchell Blvd., Suite 1
San Antonio, TX 78226-1816

Place
Postage
Here

(Fold on dotted line)

Please complete the survey on back and return to the address provided.

Kelly Restoration Advisory Board Meetings

Join us the second Tuesday of January, April, July and October at 6:30p.m.!

Kennedy High School
1922 South General McMullen
San Antonio, TX 78226

Contact Information

Air Force Real Property Agency
143 Billy Mitchell Blvd., Suite 1
San Antonio, TX 78226-1816
Local (210) 925-0956
Toll Free (866)725-7617

Information Repository

San Antonio Central Public Library
600 North Soledad
San Antonio, TX 78205
Local (210) 207-2500
www.sanantonio.gov/library



The Governor has asked San Antonio and the County to assist those devastated by Hurricane Katrina. San Antonio is in a position to help; we are extending our support to the evacuees from Louisiana in assistance of shelter, food, and medical attention. The City and County expect to receive anywhere from 5,000 to possibly 25,000 evacuees anytime over the next couple of weeks. As part of the emergency support plan, KellyUSA has been identified as an initial reception area for the first 2,500 evacuees. The City of San Antonio has designated other areas if needed.

Mayor Phil Hardberger requested assistance from KellyUSA Thursday morning; this request was last minute due to Governor Rick Perry's plea for Texas to help in the relief efforts.

As part of the logistical efforts, the following has been implemented:

- Building 171 has been designated as a site for those from New Orleans. This location will provide shelter for approximately 2,500 individuals. Building 1536 will handle the overflow.
- The City of San Antonio and the Red Cross will provide the following:
 - Logistical support
 - Enhance security
 - Set up triage
 - Secure water
 - Provide additional port-a-potties (if needed)
- KellyUSA will provide the following:
 - Additional security for the property
 - Communication to tenants (when needed)
 - Support to relief efforts

For information regarding how you can help as a volunteer, dial 211.

For information regarding donations of food, money and water, please call the Salvation Army at 1-800-SAL ARMY or the American Red Cross at 1-800-HELP NOW.

Should you have specific questions pertaining to the KellyUSA property, please contact: Terry Britton, 210-643-1360.

Thank you for your support.

Bruce E. Miller
Chief Executive Officer



SNAP SHOT: HURRICANE KATRINA USAF RELIEF EFFORTS

AS OF 1800L, 8 SEP 2005

USAF Action Today		USAF Action To-Date	
Rescues	107	Rescues	5110
Sorties	261	Sorties	2514
Passengers flown	801	Passengers flown	23,517
Cargo tons delivered	796	Cargo tons delivered	11,260
Aeromedical evac. patients moved	2	Aeromedical evac. patients moved	2555
Civil Air Patrol sorties	21	Civil Air Patrol sorties	156

USAF AIRCRAFT IN ACTION

Aircraft	Mission	Aircraft	Mission
C-130 Hercules	Airlift/Aeromed evac	E-3 Sentry	Air traffic control
C-130 Scatthe View	Aerial photo	KC-10 Extender	Airlift & aerial tanker
C-17 Globemaster III	Airlift/Aeromed evac	HC-130	Helicopter aerial refueling
C-5 Galaxy	Heavy airlift	HH-60 Pave Hawk	Search & Rescue
C-141 Stratolifter	Airlift/Aeromed evac	MC-130 Combat Talon	Search & Rescue
KC-135 Stratotanker	Airlift & aerial tanker	MH-53 Pave Low	Search & Rescue
OC-135 Open Skies	Aerial photo	C-9 Nightingale	Aeromedical evacuation
C-23	Passenger transfer	C-12	Passenger transfer
C-21	Passenger transfer	UH-1	Search & Rescue

AF HIGHLIGHTS:

- Air Force hurricane relief efforts represent the largest ever peacetime air operation on U.S. soil
- Total Force effort – nearly 7,800 active duty, Air National Guard and Reserve Airmen are supporting Hurricane Katrina relief efforts
- Air Force medical teams have treated more than 5,800 people, and air-evac'd more than 2,550 people
- Air Force crews are conducting the largest search and rescue operation since Vietnam
- Ninety-five percent of base operating support (BOS) is devoted to ongoing-ops
- 1265 Security Forces deployed to 15 locations

USAF SYSTEMS IN ACTION

1. 374th Expeditionary Rescue Group pararescuemen have supported more than 2,500 people airlifted out of the New Orleans area and taking them to local care centers. As the forced evacuation of New Orleans continues, Air Force helicopter crews are flying fewer rescues and conducting more ferry missions from evacuee collection points.

2. Little Rock Air Force Base was tapped as the hub and clearinghouse for all international aid air shipments for Hurricane Katrina victims. The first international aid for Hurricane Katrina victims touched down in Arkansas Sept. 5 and more international flights are scheduled to land here in the next week.

OVERALL AF MESSAGE: The Air Force's primary focus involves saving lives, sustaining lives and assisting FEMA in recovery operations for HURRICANE KATRINA.

KEY MESSAGES:

- More than 7,700 Active, Guard and Reserve Airmen are supporting hurricane relief operations.
- The U.S. Air Force Total Force is working around the clock to save and sustain lives with aeromedical evacuations and EMEDS, airlift, search and rescue and air refueling missions being flown.
- America's Air Force is answering the call for emergency assistance in this crisis. Our total force -- active, Air Guard and Air Force Reserve units -- using a mix of air support, transportable hospitals, logistics and vital services are superbly trained and well equipped to respond to the nation's call to help.
- U.S. Air Force Pararescue specialists are equipped with specialized night vision capabilities for search and rescue missions. They are highly trained emergency medical technicians.
- The U.S. Air Force re-opened the New Orleans International Airport and are supervising flying operations in and out of the city. We're experts in aerial operations in austere conditions.
- The Air Force is committed helping those in need for as long as we are needed.
- This is a collaborative effort. We are working to meet local and state requirements forwarded to the Department of Defense through state governors and FEMA federal coordinators.
- We are partnering with state and federal agencies, such as the Dept of Transportation to move supplies and equipment and the Dept of Health and Human Services to augment hospitals and provide medical support.
- US Northern Command is leading the Department of Defense effort, as directed by Secretary Rumsfeld, in direct support of FEMA and in accordance with the National Response Plan.
- Responding to disasters is something we have planned for, trained for, and are ready for.

SECAF statement: "Our active, Air Guard and Air Force Reserve units have responded as a total force to this national emergency. Our goal is to save lives and help the people of Louisiana, Mississippi, and Alabama recover from this disaster."

CSAF statement: "America's Air Force is answering the call for emergency assistance in this crisis. "Our total force -- active, Air Guard and Air Force Reserve --using a mix of air support, transportable hospitals, logistics and vital services, are superbly trained and well equipped to respond to the call for help. We will continue to work with other agencies to provide this much needed support."



**DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY**

SEP 13 2005

AFRPA/DC-Kelly
143 Billy Mitchell Blvd Ste 1
San Antonio TX 78226-1816

Dear Kelly Restoration Advisory Board Members

Concerns over a possible cluster of amyotrophic lateral sclerosis (ALS) among past workers at the former Kelly Air Force Base (Kelly AFB) led to the implementation of a series of scientific investigations. Efforts to gain insight into the occupational, environmental and lifestyle exposure histories of persons with ALS (PALS) resulted in a collaboration between the ALS Association-South Texas Chapter, the ALS Association-National Office, the Texas Department of State Health Services, the San Antonio Metropolitan Health District, the Agency for Toxic Substances and Disease Registry and the Air Force Institute for Operational Health (AFIOH) on a case series investigation. The investigation focused on PALS who had previously been employed at the former Kelly AFB.

The findings of these investigations were released 29 August 2005 in a document titled *Case Series Investigation of Amyotrophic Lateral Sclerosis (ALS) Among Former Kelly Air Force Base Workers*. The document identifies study questions, methods for data collection, results, discussions and conclusions pertaining to persons previously employed at the former Kelly AFB who reported having ALS.

The full report can be found online at the Website listed below.

http://www.brooks.af.mil/afioh/Services/publications_info.htm
Air Force Institute for Operational Health
Risk Analysis Directorate
Risk Assessment Division
2513 Kennedy Circle
Brooks City-Base, TX 78235-5116

Additional questions should be directed to the AFIOH at (210) 536-3872.

Sincerely

A handwritten signature in cursive script that reads "Adam G. Antwine".

ADAM G. ANTWINE
Senior Representative

IOH-RS-BR-TR-2005-0001



**UNITED STATES AIR FORCE
AFIOH**

**Case Series Investigation of
Amyotrophic Lateral Sclerosis (ALS)
Among Former Kelly Air Force Base
Workers**

**Brooke L. Wackerman
Shari L. Shanklin
Wilson W. McGriff**

**Oak Ridge Institute for Science and Education
P. O. Box 117
Oak Ridge, TN 37831-0117**

**Kenneth L. Cox, Col, USAF
J. Kevin Grayson, Lt Col, USAF**

April 2005

*Approved for public release;
distribution is unlimited.*

**Air Force Institute for Operational Health
Risk Analysis Directorate
Risk Assessment Division
2513 Kennedy Circle
Brooks City-Base TX 78235-5116**

EXECUTIVE SUMMARY

Concerns over a possible cluster of amyotrophic lateral sclerosis (ALS) among former workers at Kelly Air Force Base (Kelly AFB) prompted a series of scientific investigations. In an attempt to gain insight into the occupational, environmental and lifestyle exposure histories of persons with ALS (PALS), the ALS Association-South Texas Chapter (ALSA-STC) and the Air Force Institute for Operational Health (AFIOH) collaborated on a case series investigation of persons linked to Kelly AFB who reported having ALS.

Study questions

- In what ways are the Kelly AFB PALS similar to or different from the ALS cases described in the scientific/medical literature?
- In what ways are the Kelly AFB PALS similar to or different from the U.S. adult population in general?

Methods

- Individuals were primarily identified through self-referral to the ALSA-STC and were accepted as potential cases if they self-reported both ALS and a Kelly AFB connection.
- Data collection began in February 2002 and was completed in March 2003.
- The data collection tool covered demographic, lifestyle, medical, residential, and occupational history factors.
- Proxy reports were accepted if patients were deceased or unable to complete the questionnaire.
- Descriptive analyses were run for all sections; frequency and percent distributions were reported.

Results

- Out of 142 potential cases initially identified, 93 returned questionnaires that were ultimately included in the analysis. The results below apply to those 93 cases.
 - Cases were mainly white (82%) and male (91%).
 - Four participants (4%) reported having a blood relative with ALS, signifying a familial case of ALS.
 - Among deceased PALS, median time from symptom onset to death was 27.6 months, while median time from diagnosis to death was 14.4 months.
 - The most frequently mentioned concurrent or prior medical conditions were high blood pressure (n=22, 24%), heart disease (n=18, 19%), cancer (n=12, 13%), and arthritis (n=10, 11%).
 - 7 (8%) cases sustained an injury requiring a doctor or emergency room visit in the year prior to diagnosis.
 - 18 (19%) cases underwent surgery for reasons other than injury in the year prior to diagnosis.
 - The top five recreational activities regularly participated in by PALS included gardening (n=46, 50%), auto repair (n=31, 33%),

- woodworking/carpentry (n=21, 23%), hiking/camping (n=20, 22%), and hunting (n=19, 20%).
- Six (6%) PALS had been professional or semi-professional athletes.
 - Two-thirds (n=62, 67%) of PALS had smoked at least 100 cigarettes in their lifetime.
 - A quarter (n=22, 24%) of all PALS were current smokers at diagnosis.
 - 80% (n=74) of cases had served in the military.
 - Over half of all cases had served in the Air Force (n=54, 58%).
 - Over half (n=53, 57%) had also served during campaigns.
 - 39% of cases were WWII veterans.
 - Kelly AFB was not as principal a work location as initially expected for the 20-year work history preceding cases' diagnoses.
 - Only 40 PALS (43%) held a Kelly AFB job during this time frame.
 - The remainder either worked at (or was somehow linked with) Kelly AFB outside that time frame or did not provide enough date information to identify Kelly AFB jobs.
 - Among jobs occurring at Kelly AFB, half (n=30) were white collar, and half (n=30) were blue collar.
 - Of the 79 last jobs held prior to diagnosis, including Kelly and non-Kelly employment, 53% were white collar, and 47% were blue collar.
 - Professional, technical, and managerial jobs were most prevalent overall and also among job subsets—on Kelly AFB, outside Kelly AFB, and last job held.

Discussion

- Upon loose comparison to publicly available prevalence figures, PALS appeared similar to other ALS cases and the U.S. population for:
 - ALS disease courses
 - Recreational activities
 - Family medical histories
 - Immunization histories
 - Infection/trauma histories
 - Tobacco and alcohol usage histories
- Historically, these cases may have been more physically active, in general, than other ALS series and the general population.
 - Cases reported a low prevalence of obesity-related diseases.
 - Cases were also athletic; 6 of the 93 PALS had been professional or semi-professional athletes.
- The preponderance of males was a major difference between this ALS case series and those described in the literature.
 - Possible explanations for this difference include that many of the WW-II respondents were at Kelly AFB learning to fly or training for other war-time jobs, opportunities that were not available to women at the time.
- A "healthy worker" or "healthy soldier effect" might be present, as our cases reported extensive military histories.

- It is very important to keep in mind that this study was necessarily limited in several respects:
 - All information was self-reported.
 - Since no comparison group was selected for this highly heterogeneous case series, no risk assessments or causal inferences could be made.
 - At 77 pages, the survey was lengthy and time-consuming to complete.
 - Proxies, not patients, completed a majority of the questionnaires.
 - Proxy recall of exposures is generally less reliable.
 - Proxies tend to underreport more often than patients do.
 - General U.S. population prevalence figures were used for comparisons to many sections of the questionnaire.
 - U.S. figures specific to the age, gender, and ethnic background of this series were not always available.
 - The validity of these comparisons should not be overestimated.

Conclusions

- Using reported prevalence figures as a comparison, PALS appeared similar to other ALS cases and the U.S. adult population for ALS disease course, recreational, immunization, infection/trauma, tobacco use, alcohol use, and family medical histories.
- Historically, these cases may have been more physically active than other ALS case series and U.S. adults overall, perhaps due to a “healthy worker” or “healthy soldier effect.”
- The limitations of the study, including the highly heterogeneous population, amount of proxy report, absence of a control group, length of the questionnaire, and use of generalized comparison figures, must be considered when discussing and interpreting the results.

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE