



**Proposed Plan
Air Force Proposes No Further Action for
Small Arms Firing Range (Site SR105)
PUBLIC COMMENTS INVITED**

A. INTRODUCTION

The purpose of this *No Further Action Proposed Plan*¹ (PP) is to present the United States Air Force's (Air Force) preferred approach for Site SR105, previously described as the Small Arms Firing Range (SAFR), at the Former Galena Forward Operating Location (FOL), Alaska, under the *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)*. The Air Force proposes no further action at Site SR105 because all soil that posed *unacceptable risk* to human health and/or the environment has been removed during excavation activities conducted as part of a *time critical removal action (TCRA)* performed between July and October 2015. The SAFR berms were demolished, the site regraded, and all contaminated soil was transported from the site by August 2016. Site SR105 is therefore considered safe for unlimited use/unrestricted exposure (UU/UE).

B. THE CERCLA PROCESS

In accordance with the *Defense Environmental Restoration Program*, the Air Force, representing the Office of the Secretary of Defense, is the CERCLA lead agency responsible for environmental response actions at the Former Galena FOL, and because the site is not listed on the National Priorities List, the Alaska Department of Environmental Conservation (ADEC) is the lead regulatory support agency. This PP is a document the Air Force (as the lead agency) is required to issue to fulfill the requirements of CERCLA §117(a) and *National Contingency Plan (NCP)* §300.430(f)(2). Site SR105 was initially evaluated under the Military's Munitions Response Program (MMRP) and subsequently, the early documents produced for Site SR105 use the MMRP nomenclature rather than the CERCLA nomenclature. The Air Force currently manages small arms ranges under the CERCLA process. **Figure 1** depicts where Site SR105 currently is in the CERCLA process, the completed CERCLA phases specific to Site SR105, and the correlating MMRP nomenclature where applicable.

Public input is important to the decision-making process. The Air Force will review and consider all comments received before the *Record of Decision (ROD)* is prepared for Site SR105. In consultation with ADEC, the Air Force may modify the preferred approach based on new information and/or public comments. The ROD will describe the Air Force's final decision and will include a *Responsiveness Summary* to document public comments, and

Community Involvement Opportunities

Public comments on this PP will be considered before a final remedy is selected for this site.

Public Comment Period

October 26, 2016 through 5:00 p.m., November 28, 2016
The public is encouraged to send written comments regarding information provided in this PP and supporting documents to:

Mr. AL Weilbacher
2261 Hughes Ave. Ste 155
JBSA Lackland TX 78236-9853
E-mail: adolph.weilbacher@us.af.mil
Phone: (210) 395-9421

All mailed comments must be postmarked by November 28, 2016.

General Questions/Comments may also be referred to the Air Force Public Affairs team at (866) 725-7617 or afcec.pa@us.af.mil.

Public Meeting

Date: October 26, 2016 Time: 7:00 p.m.

The public is encouraged to attend a public meeting to discuss the information presented in this PP. There will be an opportunity to ask questions and provide formal comments during the public meeting. Representatives from the Air Force and ADEC will participate. The public meeting will be held at the following location:

Larsen Charlie Community Hall
Galena, AK

Information Repository & AR

Preliminary Assessment, Site Inspection, and Time Critical Removal Action documents can be found in the AR located at:

The Charles Evans Community Library,
Antoski Road (inside Galena High School),
Galena, AK 99741 (907) 656-1205.

All supporting documents can also be found online at: <http://www.afcec.af.mil/Home/BRAC/Galena.aspx> or directly at:

<http://afcec.publicadmin-record.us.af.mil/Search.aspx>

To search for supporting documents, select BRAC, select Galena, then enter the reference AR# into the Full Metadata Search field for easy access. AR numbers for supporting documents can be found at the end of this PP.

¹ Italicized words or phrases are defined in the glossary at the end of this document.

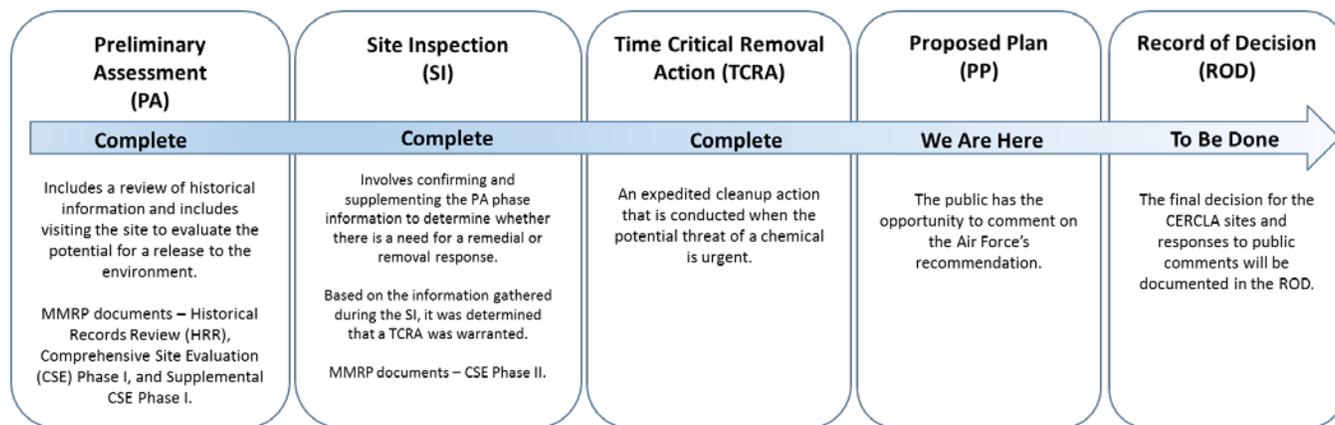


Figure 1 – Site SR105 in the CERCLA Process

respond to comments on the PP. The Air Force encourages public comment on this PP and other material in the *Administrative Record* (AR) file, either at the public meeting scheduled for October 26, 2016, or by written comment. The public will have from October 26, 2016 to the end of the comment period (November 28, 2016) to submit written comments. A comment sheet is provided as an attachment to this PP.

This PP summarizes information presented in greater detail in the AR for Site SR105 and listed in Section G of this PP.

C. SITE BACKGROUND

C.1 Galena FOL History

The Former Galena FOL was established as an airfield during World War II and most recently served as a forward operating base for the Pacific Air Force’s 611th Air Support Group headquartered at Elmendorf Air Force Base, Alaska. The Former Galena FOL was recommended for closure by the Department of Defense (DoD) *Base Closure and Realignment Act Commission (BRAC)* in 2005 and was officially closed September 30, 2008.

Today, the Air Force Civil Engineer Center (AFCEC) manages the environmental cleanup for the Air Force at the Former Galena FOL. Regulatory support is provided by ADEC.

C.2 Site SR105 History

Historical data suggests that Site SR105 was constructed as a firing range sometime between 1952 and 1963. Until recently, the Site SR105 was used by local residents of Galena for recreation and for sighting hunting rifles and also by federal and state agencies for training. Historical aerial photographs depict movement/re-construction of the range berms and backstop over time. Based on the footprints of all historical configurations, Site SR105 measures at approximately 2.29 acres in size.

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C.3 Previous Public Participation Activities

The Air Force and ADEC, through the Galena *Restoration Advisory Board (RAB)*, have been working with local stakeholders, including the Loudon Tribal Council and City of Galena, to address any environmental concerns at the Former Galena FOL. The Galena RAB consists of the Air Force and ADEC representatives, government and community stakeholders including the Alaska Department of Transportation & Public Facilities (DOT&PF), the Bureau of Land Management, United States Fish and Wildlife Service, City of Galena, Galena Interior

Learning Academy, Louden Tribal Council, Gana-A'Yoo, and private citizens. The RAB meets twice a year to promote community involvement and disseminate information on the progress of environmental restoration activities.

In an effort to involve the community in the decision-making process, the public is given the opportunity to comment on the Air Force's recommendations through public meetings, and review and comment of PPs.

The Air Force also established a community outreach program to notify area residents and interested parties about upcoming public meetings, major site activities, and site restoration progress. Periodic newsletters, which are available on the AFCEC website (<http://www.afcec.af.mil/Home/BRAC/Galena.aspx>), are published to inform the public about the progress of the environmental cleanup.

D. SITE CHARACTERISTICS

Site SR105 is located several hundred feet (ft) west of the Galena Airport runway and west of the airport flood control dike in an undeveloped area. This property is owned by the State of Alaska and managed by the DOT&PF.

Site SR105, in its most recent orientation, had a footprint of approximately 2.29 acres and consisted of an earthen backstop and two lateral berms, each berm measuring approximately 12 ft tall. The firing range was oriented north-south, with the line of fire to the north of the firing line. The distance from the firing line to the backstop was approximately 250 ft. Site SR105 does not appear to have been maintained or re-oriented for at least 15 to 20 years based on the fact that the lateral berms were vegetated with young trees and brush. The backstop was the only non-vegetated portion of the existing range.

Air Force and ADEC Contact Information

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ADEC Environmental Program Specialist:
Mr. Guy Warren

E-mail: guy.warren1@alaska.gov
Phone: (907) 269-7528

Figure 2 depicts the most recent site layout of Site SR105.

E. OVERVIEW OF SITE INVESTIGATIONS AND REMOVAL ACTION

The following paragraphs summarize the various investigations conducted at Site SR105, which are further described in the *Action Memorandum*.

Under the MMRP, a Comprehensive Site Evaluation (CSE) Phase I Investigation was completed in 2006 (the initial Historical Records Review [HRR] was presented in this report and finalized in 2014) and a Supplemental CSE Phase I Investigation was conducted in 2007 to investigate the presence of munitions and explosives of concern (MEC), the physical conditions of various sites within the Galena FOL, and future land uses and activities for these sites. The Site SR105 was identified at this time, leading to a CSE Phase II Investigation in 2008.

E.1 Nature and Extent of Contamination

The 2008 CSE Phase II Investigation identified **lead** and **antimony** (CERCLA hazardous substances) in soil at Site SR105. The 2008 CSE Phase II Investigation reported:

- Lead was detected in soil above the most conservative Human Health Criteria of 400 milligrams per kilogram (mg/kg)
- Lead and antimony were also detected in soil above the most conservative Ecological Criteria (11 mg/kg and 0.27 mg/kg, respectively) used during this evaluation.
- The highest concentrations of lead were detected in soil from the center of the backstop, along with the one antimony result exceeding human health screening criteria.

E.2 Time Critical Removal Action

In 2014, the landowner (DOT&PF) suspended use of the SAFR and requested the Air Force remediate the site.

The Air Force issued an Action Memorandum in June 2015 to document the Air Force's decision to undertake a TCRA to remove soil containing lead and antimony at concentrations that posed a potential risk to human health and the environment.

As part of the removal action, additional characterization of contaminated soil was conducted to better define the extent of the contamination.

- A total of 401 X-ray fluorescence (XRF) field screening samples were collected and analyzed for lead
- A total of 25 XRF field screening samples were submitted to the laboratory for lead and antimony analysis
- Lead and antimony laboratory results were compared to the most stringent ADEC Method Two, Table B1 Soil Cleanup Levels.

- A total of 11 soil samples exceeded the ADEC cleanup level of 400 mg/kg for lead and 16 samples exceeded the ADEC cleanup level of 3.6 mg/kg for antimony
 - Lead exceedances ranged from between 410 to 9,500 mg/kg
 - Antimony exceedances ranged from between 3.7 to 680 mg/kg

Removal of contaminated soil began in July 2015. A total of 391 cubic yards (approximately 391 tons) of soil that contained concentrations of lead and antimony that posed potential risk to human health and the environment was removed from the site by 10 October 2015.

The contaminated soil was removed through six phases of excavation and confirmation sampling. Excavation and confirmation sampling continued until the removal action objectives were met. Since the vertical extent of lead and antimony contamination in soil did not reach the groundwater table (located approximately 6-28 ft below the natural ground surface) with the majority of the contaminated soil being located within the backstop of the SAFR, above the natural grade of the ground surface, and all soil remaining on site being below the most stringent ADEC Method Two Table B1 soil cleanup levels, it has been determined that groundwater has not been impacted from historical munitions use at the site.

The final excavation boundary is depicted on **Figure 2**. All field activities for the TCRA were completed and the site was restored by September 2016.

Photograph 1 shows the site before the TCRA and **Photograph 2** shows the site during the TCRA.



Photograph 1: Site SR105 prior to completion of TCRA.



Photograph 2: Site SR105 during completion of TCRA.

F. SUMMARY OF CURRENT SITE RISKS – BASIS FOR NO FURTHER ACTION

ADEC Method Two cleanup levels were used to evaluate whether cleanup was complete at Site SR105. Soil samples collected at the conclusion of the TCRA did not contain concentrations of lead or antimony above the most stringent soil cleanup levels listed in the ADEC's Table B1, Method Two, Under 40-inch Zone, Soil Cleanup Levels. Analytical data generated during the final stage of the removal action were also entered into ADEC's Method Three Cumulative Risk Calculator and evaluated. The cumulative *cancer risk* was calculated at 0, meaning risk is less than 1 in 100,000 (regulatory limit) and the cumulative *hazard index* (non-carcinogenic risk) was calculated at 0.07 (which does not exceed a cumulative *non-carcinogenic risk* standard at a hazard index of 1 across all exposure pathways) as defined in ADEC's Cumulative Risk Guidance, dated 9 June 2008.

Based on the results of the ADEC Method Three Cumulative Risk Calculator, the soil remaining in place at Site SR105 does not pose unacceptable risk to human health or the environment.

Photograph 3 depicts the site after completion of the TCRA.



Photograph 3: Site SR105 after completion of TCRA.

G. COMMUNITY PARTICIPATION

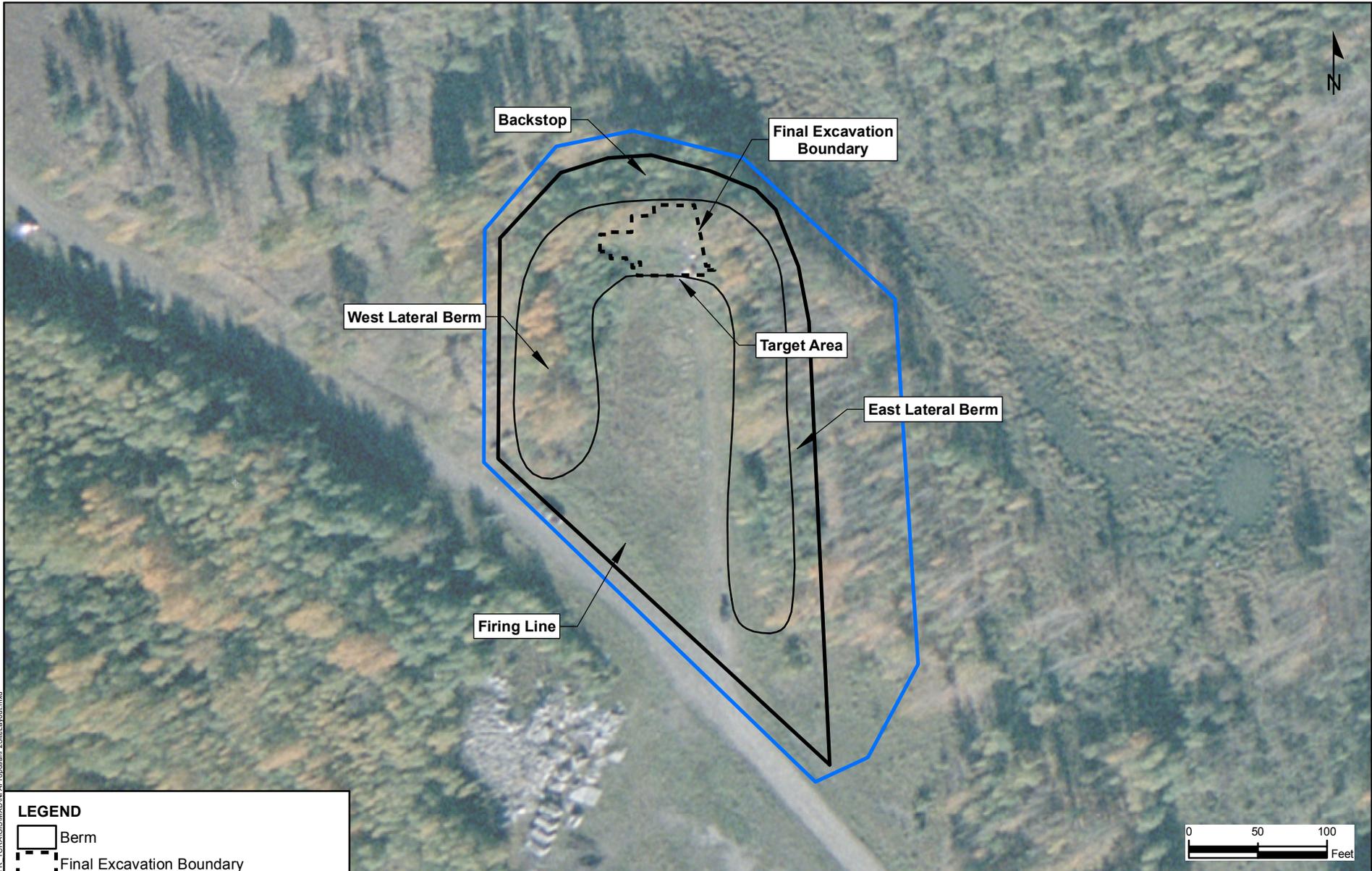
A public meeting will be held to allow the public the opportunity to review and provide comments on this PP. Details of the public meeting are provided in the “Community Involvement Opportunities” text box on page 1, together with the location of the AR for the Former Galena FOL.

Relevant documents found in the AR file include:

- Ahtna Environmental, Inc. (Ahtna), 2014. Final Historical Records Review, Military Munitions Response Program, Supplemental Comprehensive Site Evaluation, Former Forward Operating Location, Galena, Alaska. May. AR#300961 and AR#300961.1
- Ahtna, 2015. Action Memorandum, Small Arms Firing Range, Time Critical Removal Action, Former Galena Operating Location, Galena, Alaska. June. AR#461925
- Ahtna, 2016. Removal Action Completion Report, Small Arms Firing Range (Site SR105) Time Critical Removal Action, Former Galena Forward Operation Location, Galena, Alaska, Pending. AR#540301, AR#540301.1, AR#540301.2, #540301.3, and #540301.4
- Bay West LLC (Bay West), 2008. Final Supplemental Comprehensive Site Evaluation (CSE) Phase I Findings Report, Revision 01, Air Force Military Munitions Response Program, Galena Air Station, Alaska. Prepared for United States Army Corps of Engineers Omaha District and Pacific Air Forces. June. AR#367
- Bay West, 2009. Comprehensive Site Evaluation (CSE) Phase II, Draft Final Report, Galena Air Station, Alaska. Prepared for Pacific Air Forces. November. AR#431
- Weston Solutions, Inc. (Weston), 2007. Final Comprehensive Site Evaluation Phase I at Various Alaska Installations. May. AR#318

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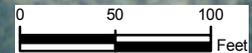


LEGEND

-  Berm
-  Final Excavation Boundary
-  Former and Historical Small Arms Firing Range Footprint (2.29 ac)
-  Former Small Arms Firing Range Footprint (1.56 ac)

Notes:

1. Image credit: Aerometric, 2012.
2. All measurements are approximate.
3. Historical footprint delineated using imagery from: 1963, 1985, 2002, and 2012.



No Further Action Proposal Plan
Site Layout and Final Excavation Boundary
 Former Galena Forward Operating Location
 Small Arms Firing Range Time Critical Removal Action
 Galena, Alaska

Ahtna
 Environmental, Inc.

Project Number:
 05033.02
 Date:
 9/27/2016
 Drafted By:
 R.F.

Figure Number:
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ACRONYMS AND ABBREVIATIONS

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
AFCEC	Air Force Civil Engineer Center
Air Force	United States Air Force
AR	Administrative Record
BRAC	Base Closure and Realignment Act Commission
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CSE	Comprehensive Site Evaluation
DoD	Department of Defense
DOT&PF	Alaska Department of Transportation & Public Facilities
EPA	United States Environmental Protection Agency
ft	feet
FOL	Forward Operating Location
HRR	Historical Records Review
MEC	munitions and explosives of concern
mg/kg	milligram(s) per kilogram
MMRP	Military Munitions Response Program
NCP	National Contingency Plan
PP	Proposed Plan
RAB	Restoration Advisory Board
ROD	Record of Decision
SAFR	Small Arms Firing Range
TCRA	Time Critical Removal Action
UU/UE	Unlimited Use/Unrestricted Exposure
XRF	X-ray fluorescence

GLOSSARY

Action Memorandum: A decision document that provides a concise written record of the selection and approval of a removal action. It describes the site's history, current activities, and threats to human health and the environment as well as outlines the action, develops cleanup levels, and documents approval of the proposed removal action by the proper regulatory agency.

Administrative Record (AR): A record maintained by the Air Force of all reports, studies, evaluations, records or other information relating to the environmental restoration program for a specific installation.

Alaska Department of Environmental Conservation (ADEC): The state agency responsible for protecting public health and the environment within the state. The Spill Prevention and Response Division is charged with protecting public health and the environment from sites contaminated by oil or other hazardous substances.

Base Closure and Realignment Act: The federal law that provides the authority, process, and schedule for closing an operating DoD facility.

Cancer Risk: Cancer risk is assessed by examining the likelihood of cancer resulting from exposure to contaminants at a site. Cancer risk is expressed as the incremental probability of an individual developing cancer over a lifetime as a result of exposure to carcinogens. For example, a 1 in 100,000 risk (usually written as "1 x 10⁻⁵") means for every 100,000 people (receptors) exposed to site contaminants, one extra case of cancer may occur than normally would be expected from all other causes in the area. ADEC has established a target cumulative cancer risk standard of 1 in 100,000 (1x10⁻⁵) per 18 Alaska Administrative Code (AAC) 75.325(g).

Cleanup: Efforts to mitigate environmental damages or threats to human health, safety, or welfare from hazardous substances or oil. It may include removal of hazardous substances from the environment, including restoration, remediation, and other measures that are necessary to mitigate or avoid further threat to public health, safety and welfare, or the environment. Cleanup is often used interchangeably with terms like corrective action, remedial action, removal action, or response action. It is often used broadly to describe various actions or phases of an action, such as the Remedial Investigation in the CERCLA process.

Comprehensive Environmental Response, Compensation and Liability Act

(CERCLA): Commonly known as the Superfund law, CERCLA is a federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act. The EPA is responsible for implementing these laws. Under the program, EPA can either:

1) Pay for the site cleanup when parties responsible for the contamination cannot be located or are unwilling or unable to perform the work, and/or 2) take legal action to force parties responsible for site contamination to clean up the site or pay back the federal government for the cost of the cleanup.

Defense Environmental Restoration Program: A program establishing authorities and responsibilities for conducting environmental restoration activities at facilities under DoD jurisdiction. This law establishes DoD and Component Environmental Restoration Accounts (ERAs) to fund Defense Environmental Restoration Program activities (10 USC § 2701 et seq.). The Air Force conducts its Defense Environmental Restoration Program activities as the Environmental Restoration Program.

Hazard Index: Used for human health risk assessments, the hazard index is a summation of the risks of potential exposure to each chemical at the site representing the potential noncancer health risk. An HI value of 1 or less is considered an acceptable exposure level.

National Contingency Plan (NCP): The National Oil and Hazardous Substances Pollution Contingency Plan (40 Code of Federal Regulation 300), more commonly called the NCP, is the federal government's plan for responding to both oil spills and releases of hazardous substances (actual and potential). The NCP is at the heart of the National Response System, under which federal departments and agencies help state and local officials protect public health and the environment during hazardous materials emergencies, including emergency removal actions at hazardous waste sites.

Non-Carcinogenic Hazard: The measure used to describe the potential for non-cancer health effects to occur in an individual is expressed as a "*hazard index*". The hazard index is a comparison of the estimated exposure level (considering all contaminants present at the site and all potential pathways of exposure) to an exposure level that is considered to be without an appreciable risk of adverse effects (a "safe" level). If the hazard index (the ratio of the estimated exposure level to the "safe" exposure level) is less than 1, there is low

potential for adverse human health effects resulting from exposure to contaminants at the site.

No Further Action: A determination for sites where a CERCLA remedial or removal action has been conducted that, based on analysis of chemical concentrations remaining in place and risks they may pose to human health and the environment, no additional actions are required. The response is complete because site contaminants have been remediated in accordance with all applicable laws and regulations. The site is protective of human health and the environment and there are no restrictions on land use.

Preliminary Assessment: A review of historical information, including a site visit to evaluate the potential for a release of hazardous substance.

Proposed Plan: This document summarizes for the public the preferred cleanup strategy, rationale for the preference, and alternatives presented in the detailed analysis of the RI/FS. It must actively solicit public review and comment on all the alternatives under consideration.

Public Comment Period: A time period for the public to review and submit comment on various documents and actions. A comment period cannot be less than 30 days and upon timely request to the lead agency, the comment period will be extended by a minimum of 30 additional days.

Receptor: The organism(s) or ecological resource(s) of interest that might be adversely affected by contact or exposure to a stressor. "Stressor" means any physical, chemical or biological entity that can induce an adverse effect.

Record of Decision (ROD): A document that explains which cleanup alternative(s) will be used at a site or that justifies no further action. The ROD is based on information and technical analysis generated during the CERCLA process and consideration of public comments and community concerns.

Remedial Investigation: A CERCLA process to determine the nature and extent of the contamination resulting from the release of a hazardous substance. The RI emphasizes characterization and associated data collection at hazardous waste sites.

Removal Action Completion Report: A report that describes the activities conducted during a removal action. The Removal Action Completion Report formally documents the achievement of cleanup objectives specified in the Action Memorandum.

Responsiveness Summary: A summary of oral and written comments on the proposed plan received

during the comment period and responses to those comments, provided in the ROD.

Site Inspection (SI): A study that involves confirming and supplementing the PA phase information to determine whether there is a need for a remedial or removal response.

Time-critical removal action (TCRA): A cleanup action that is conducted when the potential threat of a chemical is urgent.

Unacceptable risk: A quantification of potential harm to humans, animals, or plants from exposure to contaminants at elevated levels. An unacceptable risk means there is a threat to human health or the environment and that a remedial action/removal action must be taken.

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**Proposed Plan
Small Arms Firing Range (Site SR105)
Former Galena Forward Operation Location
Galena, Alaska
Department of the Air Force
PUBLIC COMMENTS INVITED**

The Air Force encourages the public to comment on the remedial alternatives described in this Proposed Plan. Comments may be provided in writing or verbally at the public meeting to be held on October 26, 2016, at 7:00 p.m. at the Larsen Charlie Community Hall, Galena, Alaska. Written comments may be submitted using the comment form below. If additional space is needed, comments may be written neatly on plain white paper.

In addition, the Air Force welcomes written comments submitted directly to our office. Comments may be submitted to:

Mr. AL Weilbacher
2261 Hughes Ave. Ste 155
JBSA Lackland, TX 78236-9853
(210) 395-9421

or via email at adolph.weilbacher@us.af.mil

General Questions/Comments may also be referred to the Air Force Public Affairs team at (866) 725-7617 or afcec.pa@us.af.mil.

After the comment period closes on November 28, 2016, the Air Force will respond to all comments, which will be included in the Responsiveness Summary of the ROD.

Please complete the following information and mail to the address above or copy into an email to Mr. Weilbacher.

Name: _____
Address: _____

Phone: _____
E-mail: _____

- I support the Air Force's preferred alternative
- I do not support the Air Force's preferred alternative

Additional Comments: