



KELLY AFB
TEXAS

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 3248

Kelly Restoration Advisory Board (RAB)

Meeting Agenda

Tuesday, July 20, 2004 - 6:30 p.m.

Brentwood Middle School

1626 Thompson Place

RAB Co-chairs

Mr. Ruben Peña, Community

Mr. Adam Antwine, AFRPA

Meeting Goals

The RAB will:

- Advise and comment on former Kelly AFB environmental matters/documents
- Receive updates on environmental remediation projects

I.	<u>Roll call begins at 6:30 p.m.</u>		6:30-6:40
	- Community Co-chair will convene the meeting	Mr. Ruben Peña	
	- Approve April and May 2004 RAB meetings' minutes		
	- Pledge of Allegiance		
	- Moment of silence		
	- Welcome and introductions	Dr. David Smith	
	- Discuss goals for this meeting		
	- Review supplemental packages		
II.	Standard Aero, ISO14001 Certification presentation	Mr. Brian Skrobarcek Standard Aero	6:40-6:50
III.	Semi-Annual Compliance Report presentation	Mr. Bob Goodson, Ch2MHill	6:50-7:20
IV.	Question and Answers on Semi-Annual Compliance Report	Dr. David Smith	7:20-7:30
V.	Break		7:30-7:40
VI.	Community comment time		7:40-7:55
	- Persons turning in a speaker's card may have up to three minutes		
VII.	Announcements		7:55-8:10
	- Community update on events and issues relevant to their constituencies	Community Members	
	- BRAC Cleanup Team update	Ms. Norma Landez	
	- Greater Kelly Development Authority update	Mr. Gary Martin	
	- Metro Health update	Mr. Sam Sanchez	
	- AFRPA update	Mr. Adam Antwine	
	- Operating Guidelines update	Mr. Ruben Peña	
VIII.	Meeting Wrap-Up	Dr. David Smith	8:10-8:25
	- Address action items from previous meeting		
	- Review action items from current meeting		
	- Next TRS meeting proposed for Tuesday, August 10, 2004, at the Environmental Health and Wellness Center at 6:30 p.m.*		
	- Next RAB meeting proposed for Tuesday, October 14, 2004, at 6:30 p.m., location TBD*		

**Meeting dates and locations are subject to change.*

**Restoration Advisory Board (RAB) Meeting Minutes
Former Kelly AFB, TX
Brentwood Middle School**

July 20, 2004

Attendees:

Mr. Adam Antwine, RAB Government Co-Chair, Air Force Real Property Agency (AFRPA)
Dr. David Smith, Smith and Associates (Facilitator)
Mr. Brian Skrobarcek, Standard Aero
Mr. Bob Goodson, CH2M Hill
Ms. Carol Vaquera, RAB Community Representative
Ms. Esmeralda Galvan, RAB Community Representative
Mr. Mike DeNuccio, RAB Community Representative
Mr. Sam Murrah, RAB Community Representative
Mr. Michael Sheneman, RAB Community Representative
Mr. Pete Muzquiz, RAB Community Representative
Mr. Armando Quintanilla, RAB Community Alternate
Mr. Rodrigo Garcia, RAB Community Representative
Mr. Nazarite Perez, RAB Community Representative
Mr. Robert Silvas, RAB Community Representative
Ms. Kyle Cunningham, San Antonio Metropolitan Health District (Metro Health)
Ms. Linda Kaufman, Metro Health
Ms. Blanca Hernandez, Metro Health
Mr. Mark Weegar, Texas Commission on Environmental Quality (TCEQ)
Ms. Abigail Power, TCEQ
Mr. Gary Miller, U.S. Environmental Protection Agency (EPA)
Mr. Gary Martin, Greater Kelly Development Authority (GKDA)
Ms. Ashley Allinder, AFRPA
Ms. Leslie Brown, AFRPA
Ms. Norma Landez, AFRPA
Ms. Christine Best, Booz Allen Hamilton (Booz Allen)
Ms. Susan Hook, Booz Allen
Ms. Lynn Myrick, Booz Allen
Ms. Megan Mabee, Booz Allen
Ms. Alison Pond, Booz Allen
Ms. Rita Boland, Booz Allen
Ms. Leigh-Ann Fabianke, Smith and Associates
Ms. Robyn Thompson, Smith and Associates
Mr. Jerry Needham, *San Antonio Express-News*
Mr. Nicholas Parkinson, *Rumbo*
Mr. Arthur Sanchez, Senator Van de Putte's office
Ms. Coriene Hannapel
Ms. Gloria Ramos-Cortes
Mr. Adrian Cortes
Ms. Rose Ramos
Mr. Gilbert Ramos

Mr. Pasqual Segovia
 Ms. Maria Segovia
 Mr. Ben Galvan
 Mr. Santiago Garcia
 Ms. Cheryl Overstreet
 Mr. Al Rocha
 Ms. Julie Sanders

RAB Members Absent:

Mr. Ruben Peña, RAB Community Co-Chair
 Mr. George Rice, RAB Community Member
 Ms. Sandra Converse, RAB Community Representative
 Mr. Sam Sanchez, Metro Health
 Mr. Sergio Rodriguez, RAB Community Member

The meeting began at 6:41 p.m.

Welcome and Introduction

Mr. Adam Antwine

Mr. Adam Antwine welcomed everyone to the meeting and mentioned the posters on display in the room across the hall that explain the cleanup of contamination in Zones 2 and 3 as detailed in the Zones 2 and 3 Proposed Plan. He encouraged everyone to read and review the posters. Mr. Antwine then called the meeting to order. Eleven community members were present, representing a quorum.

Minutes Approval

RAB Members

Mr. Antwine asked the board to approve the minutes from the April and May RAB meetings. Mr. Robert Silvas made a motion to not approve the minutes until he can get an audiocassette version of the May minutes. Mr. Silvas said the April tapes were totally blank. He made a motion to not have those minutes approved. Mr. Antwine said they'd be glad to take any corrections. He said the board would take the request to provide Mr. Silvas cassettes of the May minutes.

Mr. Nazarite Perez said he would abstain from approving the May minutes because he did not attend that meeting and he had heard there was fighting about the RAB charter. He said changes to the charter did not favor the community. Ms. Kyle Cunningham said the May minutes were inaccurate, explaining that the laboratory tested the samples from the fruit and nut study for a complete panel of chemicals, not only the contaminants of concern. Ms. Esmeralda Galvan asked for a written response on Ms. Cunningham's remarks. Ms. Cunningham will provide Ms. Galvan with the test results.

Mr. Silvas commented on the April minutes, stating a trailer park falls within the boundaries of Site SS009, despite government remarks to the contrary. Mr. Silvas also wanted to know what

entity or agency from the Air Force received chemicals from Dow Chemical, including Agent Orange.

Ms. Galvan asked Ms. Cunningham about the fruit and nut study, citing community concern that most of the testing was outside of the plume. Ms. Cunningham explained that the plume is much smaller now than it was originally. Many of the trees sampled in the study fall within the old plume area. Sampling trees outside the area gave the scientists a comparison.

There was a motion to approve the April and May meeting minutes. The motion was seconded. Mr. Silvas reiterated he would not approve the May minutes without the audio. Mr. Antwine assured Mr. Silvas the staff would provide him with an audio copy of the May minutes. The motion passed and the minutes were approved.

Meeting Goals

Dr. David Smith

Dr. David Smith reminded the RAB that the meeting would include two presentations. He asked that people hold their questions until the end of each presentation. He also informed the RAB and audience members that the meeting did not allow time for everyone to ask questions during the meetings. However, people could ask the speakers questions outside while the meeting continued or talk to the speakers at the break.

Dr. Smith then walked the RAB and the audience through the agenda. Dr. Smith reminded audience members to fill out a card before the general comments period of the meeting if they wanted to address the RAB. Dr. Smith informed the RAB members that hard copies of the Semiannual Compliance Plan Report presentation were in their binders, but no hard copies of the Standard Aero presentation were currently available.

Standard Aero ISO 14001 Certification Presentation

Mr. Brian Skrobarcek

Mr. Brian Skrobarcek, Environmental Affairs Coordinator for Standard Aero, gave a presentation to introduce the ISO 14001, an environmental management system. Mr. Skrobarcek stated the purpose of the presentation was to explain the ISO 14001 voluntary standard and its environmental benefits. The presentation also aimed to explain environmental initiatives on Kelly, especially at Standard Aero. Mr. Skrobarcek informed the RAB that his company is dedicated to environmental standards and business excellence.

Mr. Armando Quintanilla asked Mr. Skrobarcek how long Standard Aero had been at Kelly. Mr. Skrobarcek replied since 1999. Mr. Quintanilla then asked how Standard Aero is dedicated to quality, since the permeable reactive barriers (PRBs) were not installed correctly. Mr. Skrobarcek explained that the PRBs are not a Standard Aero project; they are installed and controlled by the Air Force. Mr. Quintanilla further questioned Standard Aero's involvement with the PRBs. Mr. Skrobarcek replied again that the PRBs were an Air Force project and Mr. Quintanilla could receive answers to his questions from the Air Force.

Mr. Antwine explained that the Standard Aero presentation gave the Kelly area a comfort level because the company is complying with the highest environmental standards. The precautions

taken by Standard Aero represent the measures the GKDA, Air Force, and Kelly tenant companies are taking to ensure environmental safety in the area even after the Air Force presence ends.

Mr. Quintanilla then asked about Standard Aero's procedures for preventing spills. Mr. Skrobarcek said Standard Aero is probably better than anyone in the region at putting engineering controls in place. Chemicals and chemical wastes are contained and liquid sensors are in place to notify management of any leaks.

Ms. Galvan asked how Standard Aero disposes of their contaminated chemicals. Mr. Skrobarcek responded the disposal wastes go to the proper facility and the facilities are audited regularly. Ms. Galvan wanted a list of all companies that provide Standard Aero with chemicals and wanted to know how often personnel are trained. Mr. Skrobarcek said all training is up-to-date and any specialized training for new chemicals is provided as necessary. Mr. Skrobarcek also offered to contact Ms. Galvan later with the names of the chemical companies working with Standard Aero.

Dr. Smith asked that all further comments be addressed outside of the meeting room to allow the meeting to proceed. Mr. Quintanilla appealed that decision to Mr. Antwine, stating the community should be allowed to hear all the questions. Mr. Antwine said they'd be glad to take those questions, but they need to find a balance between getting information out and providing answers. He said the RAB will address any issues that arise from questioning.

Mr. Silvas said he assumed Standard Aero produced due diligence reports. He said benzoapyrene had been identified throughout the greater Kelly area and if Standard Aero wasn't aware of this chemical they should be and they should alert their workers.

RAB Members Introductions

RAB Members

During the Standard Aero presentation, Mr. Quintanilla interrupted the speaker to say he wanted the RAB members to introduce themselves. During his own introduction, Mr. Quintanilla stated he wanted the Air Force to interact better with community members and answer the community's questions. He said he has no conflict of interest that would preclude him from serving on the board. Further, he does not own any property adjacent to Kelly, nor does he represent a real estate company, nor does he want to lease or buy any Kelly property including the Non-Commissioned Officers (NCO) Club for himself or for a real estate company. Mr. Quintanilla wants compensation for the people living in the Kelly area, saying they have been mistreated, and he said that people should not have to pay taxes if they live in areas contaminated by the Air Force. Mr. Quintanilla said he wanted to address four issues in the meeting:

- The Agency for Toxic Substances and Disease Registry (ATSDR) reports that are to be presented at the August 10 TRS meeting
- The rumor that members of the RAB are serving for financial gain by buying Air Force properties

- A plan developed by the staff that will foster better interaction among community members, RAB members, Air Force representatives, and contracting staff
- The answers to the community's questions.

Mr. Silvas used his introduction period to say he had submitted a Freedom of Information Act (FOIA) request letter. If the EPA and water commission refuse to answer this FOIA request, he recommended that the board begin impeachment hearings.

Semiannual Compliance Report

Mr. Bob Goodson

Mr. Bob Goodson from CH2M Hill gave a report of the findings during the September 2003 sampling of Leon Creek, wells, and wastewater units around Kelly. He explained CH2M Hill used plume maps as the main tool for monitoring groundwater changes. Mr. Goodson also said several areas had seen a contaminant decrease and the plume is smaller now than in 2000. Contaminants in some areas still exceed acceptable levels outlined in the Resource Conservation and Recovery Act of 1976. Mr. Goodson stated that the reports are available downtown at the San Antonio Central Public Library in the government documents section and at the Environmental Health and Wellness Center on Castroville Road.

After the presentation, Dr. Smith told the audience that staff would take their names down and provide them with a copy of the presentation on CD-ROM.

Mr. Quintanilla asked for the source of the polychlorinated biphenyls (PCBs) in the fish in Leon Creek. Mr. Goodson responded that CH2M Hill doesn't know. Mr. Quintanilla asked why not. Mr. Goodson explained it was not in the intent or the scope of the report to find out why or how certain chemicals exist, only to do the studies and report the results. Mr. Quintanilla said the report is incomplete because Sites D6 and D9 have PCBs. He said the CH2M Hill report must examine PCBs further for the report to be acceptable. Mr. Quintanilla continued that people on the RAB and in the community have found documents showing that Sites D6 and D9, which are right above the dam where the contaminated fish were found, have PCBs buried there. He said the report with this information is in the community involvement plan. Mr. Quintanilla said the Air Force and CH2M Hill have denied three times that these sites are contaminated. Mr. Antwine said he believed those sites were now part of Lackland AFB and officials there were addressing the issue.

Mr. Mark Weegar explained the purpose of the CH2M Hill report is to provide data from Leon Creek and the monitoring wells. The data are then used by the Air Force and other agencies to pursue a course of action.

Mr. Silvas asked how much money the government and CH2M Hill spent on the report, which zones were included, and if the incinerator was included. He said the incinerator needs to be looked at and the reports should include that item. Mr. Weegar explained the report can't be changed, because it follows legal requirements. The report is complete for what it is required to cover.

Mr. Silvas asked the GKDA representative for the due diligence reports (DDR) for Zone 3, saying he has asked for them repeatedly. Mr. Gary Martin explained the exchange of land from the Air Force to the city is a property transfer, not a property purchase. All documentation generated by the Air Force and approved by the regulators is used to decide whether the land is suitable for transfer. Mr. Silvas then asked about benzoapyrene in Zone 3, saying that Mr. Patrick Lynch reviewed DDR reports on the subject. Mr. Martin responded that the GKDA had not produced DDRs nor provided them to Mr. Lynch.

Mr. Rodrigo Garcia said the Semiannual Compliance Report is too long and technical. He requested the report be summarized professionally by consultants and submitted to the RAB members. He also said the EPA and Air Force should provide more information on air pollution.

Ms. Galvan said she had several questions, but, in the interest of time, she would present them in writing. Ms. Galvan requested the responses to questions be provided in layman's terms so everyone could understand their meanings.

Ms. Coriene Hannapel said the TCE level in one area had increased 19-fold since 2002 and asked why that was not mentioned in the report. Mr. Goodson said the item she asked about focuses on maximum concentrations and is variable. Ms. Hannapel expressed concern that the same wells aren't monitored during each sampling event. Mr. Goodson explained that CH2M Hill monitors a large number of wells and approximately 400 wells are monitored every time, which gives an accurate example of contaminants in the area. He also said that some wells are abandoned or destroyed. This accounts for a lack of resampling.

Ms. Hannapel requested to see the well information in the report. Mr. Goodson responded that all information is provided in the report. Ms. Hannapel then asked if the report said groundwater was filtering into Leon Creek. Mr. Goodson responded, yes, in some places, and that that had been reported in previous compliance reports. Ms. Hannapel asked about Site E3, and said she wanted to know why all chlorinated solvent levels had risen. She said she wanted to see the raw data. Ms. Hannapel said the only line in the report mentioning the PRBs said the government and its contractors had not determined if the PRBs were working. Mr. Goodson explained that the evaluation of the PRBs was not part of the report. After mentioning that she would submit some of her questions in written format, Ms. Hannapel queried about the blanks that were thrown out during the sampling analysis. Mr. Goodson and another CH2M Hill chemist explained to her that the discarded blanks did not affect the accuracy of the report results.

Ms. Norma Landez explained that some PRB areas were not sampled because the PRBs were too new at the time of sampling. Those areas will be studied in the next sampling session. After the break, Dr. Smith asked if anyone else had questions for Mr. Goodson. No one responded in the affirmative.

Community Comments

Community resident Mr. Pasqual Segovia asked who was in charge locally of allocating money to the Kelly cleanup projects. Mr. Antwine said he had some control over the money and would

answer whatever questions Mr. Segovia had. Mr. Segovia asked how much money had been spent on the cleanup projects. Mr. Antwine answered \$300 million since 1980 and the Air Force was keeping track of the money. Mr. Segovia wanted to know how much had been spent this year and Mr. Antwine said he could provide more information, but around \$30 million had been spent.

Mr. Segovia said Air Force cleanup projects were taking too long and the community was angered at the delays. Mr. Sam Murrah explained that the project speed wasn't a matter of money, but a matter of only being able to progress at a pace allowable by nature. Mr. Quintanilla said the RAB has had problems establishing what was going to be cleaned up and in what order for 10 years.

Ms. Gloria Ramos-Cortez was the second person from the community with comments. Ms. Ramos-Cortez got a copy of Dr. K.C. Donnelly's report from Ms. Cunningham's office and said the report recommended further examination into the root systems of the trees examined during the fruit and nut study. Ms. Ramos-Cortez told Ms. Cunningham that she and other community members thought the root system from the trees in the fruit and nuts study needed more analysis. Ms. Cunningham said she would look into the issue.

Ms. Ramos-Cortez then said she wanted the nuts on the ground to be studied, not just the nuts on the trees. Ms. Cunningham explained that the study was to focus on the contaminations in the tree system, not ground contamination. Ms. Ramos-Cortez said the pecans on the ground should be tested because people gathered the nuts off the ground, not the ones still on the trees.

Ms. Ramos-Cortez then asked why Mr. Ruben Peña was absent. She said he'd been absent for two consecutive meetings and she wanted to know why her community representative was not in attendance. Mr. Quintanilla said that the RAB charter also states that if a member is ineffective or detrimental to the RAB, he can be removed by two-thirds majority vote. He said Mr. Peña's absence made him an ineffective RAB member. Mr. Silvas said that Mr. Peña's employment by Austin Realty was a conflict of interest.

Mr. Silvas made a motion to impeach Mr. Peña. Ms. Galvan seconded the motion. Mr. Antwine said "Community Comments" was not an appropriate time to begin an impeachment process and that the issue could be addressed later.

Ms. Rose Ramos then got up to speak. She asked if air monitoring would be done during the construction of the Malone Street PRB and, if so, how often and for how long after construction was complete. Mr. Antwine said monitoring would be done throughout construction, but not after. Ms. Cunningham said groundwater monitoring would continue after construction, but air monitoring is unnecessary after the cleanup system has been installed. Mr. Antwine said they'd be glad to show Ms. Ramos the plans they do have. Ms. Ramos would like a map showing which PRBs will be monitored before the August 10 Technical Review Subcommittee (TRS) meeting. Mr. Antwine said she would be provided with the information.

Ms. Hannapel asked about PRB results. Mr. Antwine said they'd be releasing that information later. Ms. Hannapel said she submitted a question at an earlier meeting during the comment period, but she did not submit it in writing. She did not remember the question nor when she

asked it. Members of the board looked through the minutes to try to find the question. She said from now on she would submit all questions in writing. She also asked to see a copy of the May minutes, which may contain her question.

Mr. Ben Galvan spoke next. He asked why Lockheed Martin installed a slurry wall in the U-section, then dug up part of the wall a short time later. Mr. Martin explained that the construction was two separate projects and the second one started at the point the first stopped, so digging occurred in the same location. Mr. Galvan asked why the on-base cleanup was being done first and wondered why the Air Force wasn't starting with the off-base cleanup and working inward. Mr. Antwine said they attack the source first to contain the highest levels of contamination and stop the leaks at the source.

Mr. Silvas, Ms. Galvan, and Mr. Quintanilla said the RAB needed to develop a better process for answering questions from the community. Ms. Galvan said she would put her request in writing and maybe she could get a written response.

Mr. Silvas also wanted to address the issue about open records and the water commission and the EPA not releasing information to the RAB members.

Announcements

Community Events and Issues Update RAB Members

The RAB members discussed how best to answer community questions. Mr. Gonzalez said he, and he believed the other people on the board, was sincere in getting responses to the community members' questions. He said community members should at least get a status report on the response to their questions.

Mr. Mike DeNuccio said he thought the board had decided on a response to community questions procedure previously, but the process was not being utilized. Mr. DeNuccio said staff and RAB members should answer questions based on the standard operating procedures.

Ms. Carol Vaquera said maybe the agenda should include a time for answers to the public regarding questions from the previous meeting.

Mr. Martin said he thought a written response would be sent to the requester and a copy of the response provided in the next RAB meeting handout.

Mr. Antwine ended the discussion by deciding the board would take an action on the issue of addressing questions in writing and explaining that the board should attempt to answer questions in face-to-face interactions to prevent community members from having to wait for written responses. Mr. Antwine said that within 10 days people should have a response to their questions or receive a call on the status of their question and the staff needs to uphold that process.

Mr. Silvas said that spill reports should be presented at the RAB meetings. Dr. Smith said they would be presented as per the agenda and would be presented at all following RAB meetings. The members then discussed the possible removal of Mr. Peña from the board.

Mr. Quintanilla motioned that a letter be sent to Mr. Peña asking him to resign. Mr. Silvas seconded the motion.

Mr. Antwine asked if they wanted him to send the letter. Mr. Quintanilla responded, yes, him or the staff. Mr. Antwine responded he believed the community members were supposed to draft that type of letter and Mr. Quintanilla said the community was throwing it off; they don't have the resources to do it.

After discussion and review of the charter, it was decided that a member had to miss three consecutive meetings without sending an alternate to be considered for dismissal. However, RAB community members could send a letter asking him to resign with a two-thirds majority vote.

Mr. Quintanilla made a motion to send a letter asking Mr. Peña to resign. Ms. Galvan seconded the motion. Mr. Gonzalez said it was unfair to single out Mr. Peña and the minutes should be reviewed to identify all delinquent members. Mr. DeNuccio asked if Mr. Quintanilla would accept a friendly motion to have the staff review the minutes and send the same letter (asking them to show up or step down) to all RAB members who had missed two consecutive meetings and did not send an alternate. Mr. Quintanilla accepted.

After discussion on the motion and argument over who could vote, Mr. DeNuccio read from the charter amendments that only community members could vote, but members had to miss three consecutive meetings and the board doesn't have to ask the member(s) to resign, they can vote a member(s) off by simple majority. Mr. Quintanilla withdrew his motion to send a letter to Mr. Peña, but he made a motion to have the staff review the attendance of all the members and to have the RAB review the information provided by the staff. The motion was seconded.

Mr. Silvas said he wanted to have a closed-door meeting to discuss before the end of the night whether the water commission and EPA would be impeached from the board.

Ms. Vaquera said her name was left off the May meeting minutes even though she attended. Mr. Antwine said that correction would be made to the minutes.

The motion passed to have the staff review the attendance of all members and present the findings to board members at the next RAB meeting.

Mr. Antwine reported the announcement of the release of three ATSDR reports would take place at the next TRS meeting: the final Public Health Assessment, the final On-Base Water Consult, and the final On-Base Current Air Consult. A press release announcing the release of the reports will go out August 11. ATSDR offered to have the scientist in charge of the air emission report available to the RAB at the October board meeting for a question and answer session.

Mr. Quintanilla said a recommendation needed to be made at the October RAB meeting that if the ATSDR found Kelly was not responsible for the illnesses in the area, the RAB needed to find out who or what is responsible. Ms. Cunningham and Mr. Antwine said the board should wait for the report and then make decisions. Mr. Garcia said he did not trust the ATSDR and the RAB needed to see the information provided for the report to determine if the report was truthful.

Mr. Garcia made a motion that staff summarize the consultant and government reports given to ATSDR about air emissions/pollutants and present that information to the RAB. The motion was seconded. Mr. Weegar pointed out that ATSDR is considered the expert agency in the health field and their analysis is more dependable than analysis by the RAB or staff, who do not have the technical expertise required to analyze the reports. Mr. Weegar recommended the board wait until they have all the information in. The motion passed with 10 yeas.

BRAC Cleanup Team (BCT) Update

Ms. Norma Landez

Ms. Landez explained the discussions at the BCT meeting earlier in the day. The BCT discussed the Buildings 367 and 623 petroleum storage tanks (PSTs). Ms. Landez said the BCT proposed to move the cleanup from the PST program into corrective action. The BCT discussed Site CS-2 and some response to comments the team is in the process of giving to TCEQ. They discussed plumes in Zone 5. Data from the sampling of these plumes shows that contaminants in these areas have come in below the recommended during three consecutive samplings. The team proposes to close those areas out.

Ms. Landez said the Bungalow Colonies property is being transferred to GKDA, but there are some lead-based paint issues. The BCT and GKDA are discussing the best procedure for resolving those excavation issues in Area C in Site E-1 to ensure the contamination has been removed. A contract was awarded for a Zone 2 PRB to handle contamination coming from Zone 3 into Zone 2. A 700-foot slurry wall will also be put in that area. Cleanup on D10 ran out of funding, but the process is underway to secure more money for the project.

The Commercial Street PRB is under construction and permission has been granted to work on the northern end of that PRB. The BCT is negotiating with Union Pacific Railroad to put a PRB in the right-of-way in the railroad tracks area. The 34th Street PRB was completed in May. The team is working to secure funds to repair the street so no evidence of the construction is visible.

Mr. Garcia requested that Ms. Landez's comments be put in writing. Ms. Landez said minutes from the July BCT meeting would be included in the members' binders at the next RAB meeting.

GKDA Update

Mr. Gary Martin

Mr. Martin said no spills were reported this month. He also said a new hangar is being built on Kelly, and the project will produce 135 new jobs on KellyUSA. Later in July, the GKDA will

hold the groundbreaking for a new office building. The NCO Club on Kelly will be demolished to prepare for a development site.

Mr. Silvas asked for an update on the radium paint and the employees exposed to the substance. Mr. Martin responded all that information was provided at an earlier RAB meeting and the last action item to report was completion of the final reports. He said there would probably be an update at the next RAB or TRS meeting.

Metro Health Update
Ms. Kyle Cunningham

Ms. Cunningham said 90 people attended Metro Health's workshop in June at Our Lady of the Lake University. The 34th Street monitoring and evaluation report is ready and will be available on the Web site: www.sanantonio.gov/health/pceh. A public drinking water report will be released shortly. Questions and answers from the workshop are being returned to those who attended the workshop. Ms. Cunningham said those answers could also be given to the RAB.

AFRPA Update
Mr. Adam Antwine

Mr. Antwine asked anyone who was new to the forum to contact AFRPA with any questions. They'd be happy to provide people with information about the Kelly cleanup program and take people on a tour of the former base.

Operating Guidelines Update
Mr. Ruben Peña

An update at this meeting was not given because Mr. Peña was not in attendance.

Meeting Wrap-up

Community and RAB members need to submit questions about the Semiannual Compliance Report to Mr. Antwine in writing as soon as possible so he can address them. Mr. Garcia made a motion to have a special meeting solely to address the 2004 Semiannual Compliance Report in layman's terms. The motion was seconded. Ms. Vaquera said they could just discuss it at the next regularly-scheduled RAB meeting. Dr. Smith said that the next meeting would include an Agent Orange presentation.

Mr. Michael Sheneman said the RAB should form subcommittees to deal with specific items. Mr. Martin suggested having the September TRS meeting serve as the Compliance Report meeting. The motion passed with eight yeas to four nays.

Action Items from July 2004 RAB Meeting

- The Agent Orange presentation originally scheduled for this meeting was rescheduled because of speaker unavailability; it will be held at the August TRS meeting.

Action Items from October 2004 RAB Meeting

- A special RAB meeting will be held solely to discuss the Semiannual Compliance Report. The staff will provide a summary of the report in layman's terms to the RAB members for the meeting.
- The staff will provide Mr. Silvas with an audio copy of the May minutes.
- Staff will review the attendance of all RAB members at previous meetings and report their findings to the RAB.
- Mr. Silvas wants to proceed with impeachment of the EPA at the October RAB meeting.
- Staff will staff-summarize consultant and government reports given to the ATSDR about air emissions/pollutants and present that information to the RAB.
- Community and RAB members will present questions on the Semiannual Compliance Report in writing to Mr. Antwine so he can respond.

Dr. Smith said that the next TRS meeting will be held August 10, 2004, at 6:30 p.m., at the Environmental Health and Wellness Center.

The meeting adjourned at 10:27 p.m.

Draft
Restoration Advisory Board (RAB) Meeting Minutes
Former Kelly Air Force Base, TX
Kennedy High School

April 26, 2004

Attendees:

Mr. Ruben Peña, RAB Community Co-Chair
Mr. Daniel Gonzales, RAB Community Representative
Mr. Rodrigo Garcia, RAB Community Representative
Mr. Henry Galindo, RAB Community Representative
Ms. Esmeralda Galvan, RAB Community Representative
Mr. Sam Murrah, RAB Community Representative
Mr. Michael Sheneman, RAB Community Representative
Mr. Nazirite Perez, RAB Community Representative
Mr. Robert Silvas, RAB Community Representative
Mr. Pete Muzquiz, RAB Community Representative
Mr. Armando Quintanilla, RAB Community Representative Alternate
Mr. George Rice, RAB Community Representative
Ms. Carol Vaquera, RAB Community Representative
Mr. Adam Antwine, RAB Government Co-Chair, Air Force Real Property Agency (AFRPA)
Mr. William Ryan, AFRPA
Mr. Douglas Karas, AFRPA
Ms. Larisa Dawkins, AFRPA
Ms. Norma Landez, AFRPA
Mr. Sam Sanchez, San Antonio Metropolitan Health District (Metro Health)
Ms. Linda Kaufman, Metro Health
Mr. Gary Miller, U.S. Environmental Protection Agency (EPA)
Mr. Mark Weegar, Texas Commission on Environmental Quality (TCEQ)
Ms. Abigail Power, TCEQ
Mr. Brendan Smith, Booz Allen Hamilton (Booz Allen)
Ms. Megan Mabee, Booz Allen
Ms. Christine Best, Booz Allen
Ms. Susan Hook, Booz Allen
Ms. Stephanie Trevino, Booz Allen
Mr. Hugh Farr, Booz Allen
Dr. David Smith, Smith/Associates (Facilitator)
Ms. Brittany Watts, Smith/Associates
Mr. Joe Acord
Mr. Glen Wilkinson
Ms. Julie Wallace
Ms. Blanca Hernandez
Ms. Susan White
Ms. Anna Gonzales
Ms. Delia Silva
Mr. Ben Galvan

Ms. Belinda Silvas
Ms. Debbie Suarez
Mr. Tom Smith
Ms. Rose Ramos
Ms. Gloria Ramos-Cortes
Mr. Adrian Cortes
Mr. Gilbert Ramos
Mr. Don Barker
Mr. Richard Zunisa
Ms. Charmaine Marin
Mr. Tony Hoffman
Ms. Jill Johnston
Mr. Jeffrey Aguillon
Ms. Jennifer Billings
Ms. Bonnie Webber
Mr. Reynaldo Martinez
Ms. Gina Castaneda
Ms. Elizabeth Gomez
Mr. Edward Morales
Mr. Gilbert Sosa
Ms. Tanya Tapia
Ms. Michele Mendez
Ms. Angela Tann
Mr. John Tinder
Ms. Michele Marshall
Ms. Shannon Gutierrez
Ms. Sylvia Rodriguez
Ms. Kristen Lagow
Mr. Greg Pilly
Ms. Celida Martinez
Ms. Michelle Lopez
Ms. April Esquivel
Mr. James Wittmer
Mr. Stan Guyewski
Mr. Matthew Kraus
Ms. Paula Romo
Ms. Lupe Reyes
Mr. Linden Till
Mr. Vince Quintanilla
Mr. Felix Campos
Ms. Patricia Pearson
Mr. Matthew Yasta
Mr. Alfredo Odluna
Ms. Tasha Gonzales

Members Absent:

Ms. Sandra Converse, RAB Community Representative
Mr. Mike DeNuccio, RAB Community Representative
Mr. Gary Martin, Greater Kelly Development Authority (GKDA)
Mr. Paul Person, RAB Community Representative
Mr. Nicolas Rodriguez, Bexar Metropolitan Water District
Mr. Sergio Rodriguez, RAB Community Member

The meeting began at 6:36 p.m.

Welcome and Introductions

Dr. David Smith

Dr. David Smith welcomed all the RAB members and meeting attendees. He explained that due to the RAB community co-chair elections on tonight's agenda, Mr. Adam Antwine would be opening the meeting in place of the former community co-chair, Mr. Ruben Peña.

Mr. Antwine called the meeting to order. He asked for the approval of the January, February, and March 2004 RAB meeting minutes. Mr. Robert Silvas requested that they go back and make changes to the October 2003 meeting minutes. He claimed that they were never approved with his changes. Mr. Antwine said the RAB could not go back to reapprove minutes that have already been voted on at a previous meeting. He added that he would be happy to accept any recommended changes Mr. Silvas wanted to make on behalf of those minutes, but the RAB needed to focus on approving the minutes at hand. Mr. Silvas stated that there was never a consensus made to approve those minutes. Mr. Antwine added that he would be happy to review the meeting tapes and minutes to confirm Mr. Silvas' claim. Mr. Dan Gonzales made a motion to vote on the January, February, and March meeting minutes. Mr. Sam Murrah seconded the motion. Mr. Silvas and Mr. Nazirite Perez opposed and abstained from the approval of the minutes. However, the remaining members proceeded to approve the minutes.

Mr. Antwine led the RAB in the Pledge of Allegiance and a moment of silence. Dr. Smith discussed the goals for the meeting and the contents of the supplemental packets.

Election/Appointment of RAB Community Co-Chair

Dr. David Smith

Dr. Smith invited RAB members to make nominations for the community co-chair. Mr. Pete Muzquiz nominated Mr. Peña. Mr. Gonzales seconded the nomination. Mr. Silvas nominated Mr. Sergio Rodriguez (not present) and Mr. Perez seconded that nomination. Mr. Murrah motioned to close the floor to nominations and Mr. Gonzales seconded.

Mr. Silvas expressed interest in discussing Mr. Rodriguez's nomination. He proceeded to ask Mr. Peña to answer a few questions. Mr. Peña stated that he thought it was unfair to have only one nominee present to answer questions that both candidates should have to address. Mr. Silvas asked what the length of the term is for the community co-chair. Dr. Smith replied that the term was one year in duration. Mr. Silvas made a motion to postpone the election until the May 11 RAB meeting. Ms. Esmeralda Galvan seconded the motion.

A motion was made on whether to vote and fill the co-chair position at this meeting or to wait until the May 11th meeting. The motion resulted in seven people moving to select a co-chair at this meeting, which was voted on and passed.

Mr. Silvas asked what the qualifications are for the co-chair position. Mr. Peña stated that there are not any specific qualifications other than being a RAB member. Mr. Silvas asked if Mr. Peña is an American citizen. Mr. Peña announced that today is his birthday and he was born in Kingsville, Texas, in 1955. Eight community representatives voted to elect Mr. Peña as community co-chair. There were two votes for Mr. Rodriguez and two people abstained. Dr. Smith announced that Mr. Peña had been re-elected as community co-chair.

Environmental Progress Update

Mr. Doug Karas

Mr. Karas provided a brief update concerning the final sampling results of wells around the plume. He said the Air Force samples the groundwater every year to ensure that the systems are working properly. A community member asked how long some of these systems will be in place. Mr. Karas said about forty percent of the sites are closed. He stated that by 2010 the Air Force expects to have around 93 percent closed. He said seven percent of the sites required long term monitoring and would not close for some time. Mr. Karas stated that the Air Force will continue to test every year to ensure the success of the cleanup systems.

Mr. Silvas asked if there was any testing for porcelain in the groundwater, air, or soil. Mr. Karas said he could provide the Site S-7 closure report to Mr. Silvas. He added that this document contained the evaluation information of the site upon closure that might help answer Mr. Silvas' question.

Ms. Galvan asked when the permeable reactive barriers (PRBs) are going to be installed at Commercial Street. Mr. Karas said they are scheduled to be in place this summer. Ms. Galvan added that the maps in the presentation packets are hard to read. She requested better copies of the maps.

Mr. George Rice asked Mr. Karas about the success of the PRBs in the community. Mr. Karas said that he could not speak specifically to the data, but that he could get the information for him. Mr. Rice said he would like to schedule a tour with Mr. Karas and another person who could help explain the PRBs to him.

Operating Guidelines Update

Mr. Ruben Peña

Mr. Peña recognized two visiting groups: the environmental nursing students from the University of Texas Health Science Center, and a group of students from a toxicology class at Palo Alto Community College.

Mr. Peña thanked everyone who attended the March RAB workshop. He stated that at that workshop, three RAB members were identified to form a task committee to review the current RAB guidelines and discuss potential revisions.

Mr. Garcia stated that he has been involved because he feels there are a lot of situations that need to be redefined. Ms. Galvan, as well as Mr. Silvas, asked why the operating guidelines were being revised. Mr. Peña replied that Mr. Silvas had the option to attend the workshop, and that his input can be voiced later before the operating guidelines are voted upon. Mr. Muzquiz asked the RAB to review the addendum to the guidelines in their binders and bring their revisions to the next meeting for discussion and vote.

Community Comment Time

Dr. David Smith

Dr. Smith announced the community comment time. He reminded the community that each speaker would have three minutes to speak, and Ms. Brittany Watts would be timing them.

Mr. Armando Quintanilla stated that he has lived in the surrounding community since 1952 and was a member of the RAB until 2002. He expressed that he thought the facilitator was not allowing the community the opportunity to speak. Mr. Quintanilla suggested that the operating guidelines do need revising, but thought the RAB should wait until the new *Draft Revised Proposed RAB Rule, January 2004* becomes effective. He said that the TRS committee should be meeting more often. He mentioned that the Kelly Community Involvement Plan (CIP) illustrated that the surrounding community has no trust in the RAB or the Air Force and that the Air Force is not accountable to the community. He stated that it reinforced his disappointment in the RAB. He concluded that the RAB needs to reach out to the community and let them be heard.

The other nine individuals who turned in cards announced that they each chose to donate their three minutes to Mr. Glen Wilkinson. Dr. Smith stated that the culmination of speakers equals 27 minutes of community comment time.

Mr. Wilkinson said he was brought up in Corpus Christi, Texas, and worked at Kelly in the past. He said he knows Agent Orange was sold in 1974 by Texas Surplus to the Sabine River Authority. He stated that he believes there were two warehouses at the former Kelly AFB where barrels of Agent Orange were stored. He added that he thinks the Air Force and the state are covering it up.

Mr. Rice asked the Air Force to look into these allegations and have someone give a brief report of it at the next meeting. He asked Mr. Mark Weegar if he knew anything about this.

Mr. Weegar stated that he is aware of the old Site S-7. He added that this is the first time he has heard about the potential that Agent Orange was stored in warehouses at Kelly. He said there is nothing wrong with the chemical being stored there. He said if it had been disposed of improperly, TCEQ would have known about it. He recommended Mr. Wilkinson talk to the Air Force to get clarification on the warehouses.

Agent Orange

Mr. Weegar motioned to have the Air Force evaluate the Environmental Baseline Survey (EBS) report at the next meeting to see if there is a documentation of warehouses in which Agent Orange might have been stored. Mr. Rice seconded the motion and it became an action item.

Ms. Gloria Ramos-Cortez asked to use the last six minutes of Mr. Wilkinson's unused time. Mr. Peña explained to Ms. Cortez that the community comment time is not set up to address or answer questions. Ms. Cortez reiterated that she was speaking for her family members. Mr. Peña explained the community comment time process: the board listens to the community comments, takes notes, discusses them, and then outlines a way to address them. He added that it is very difficult to answer questions or respond to concerns immediately after they have been voiced.

Mr. Rice asked to clarify the previous motion. He said he wanted the action item to state all instances where Agent Orange may have been used or stored at Kelly. There was no opposition, and the motion passed.

Mr. Silvas made a motion to have an expert from the Veterans Administration Hospital come and brief the RAB about Agent Orange. Ms. Galvan seconded the motion. The board voted and the motion passed to become an action item for the next meeting.

Announcements

Mr. Sam Sanchez stated that Metro Health is having a workshop on June 26, 2004 at Our Lady of the Lake University to address community health issues. Mr. Silvas asked if there could be an expert on Agent Orange there. Mr. Sanchez stated that there are health experts that can address that topic at the workshop.

Ms. Norma Landez introduced herself and reported the BRAC meeting results since February 2004.

Mr. Sanchez discussed the air quality monitoring conducted by Zephyr Environmental during the installation of the PRBs. He said that the report on their findings might be available by the May meeting. He added that there are not any air quality monitors on the south side of San Antonio. He said they are working on getting monitors installed so they can start getting information on the air quality in the area.

Mr. Garcia mentioned that he has continually requested information from the federal regulators on the air pollution studies and air quality reports in the area. He reminded Mr. Antwine to keep him updated on this issue.

Mr. Antwine said that he will discuss Mr. Garcia's concerns with him later. He added that he wanted to mention that air quality is a big concern not just for Kelly, but for the entire city. He said the issue of air monitoring stations is a valid question, but the Air Force cannot answer all air emission concerns. He stated that the RAB is awaiting the past air emissions report from the Agency for Toxic Substances and Disease Registry (ATSDR). Mr. Antwine mentioned that he expects this report to address how the air might have been affected in the past.

Mr. Quintanilla reiterated his earlier statement that the community does not trust the Air Force. He stated that it is the RAB's job to change this view. Mr. Antwine and Mr. Quintanilla exchanged opinions concerning the scope of the RAB and the amount of money the Air Force has spent to clean up the surrounding community.

Mr. Antwine expressed frustration with the opinions that Mr. Quintanilla had voiced. He later apologized for his comments and asked the community and the board members to realize the Air Force is doing its best to clean up the area around Kelly. He added that the Air Force does keep the health and safety of all individuals in mind while doing so. He added that Public Center for Environmental Health (PCEH) is available to answer any health related concerns.

Mr. Sanchez stated that the ATSDR past air emissions report should be released this summer.

Action Items for May 2004 RAB Meeting

- Air Force will evaluate the EBS for references to storage of Agent Orange at Kelly
- The Air Force will invite a Veterans Affairs (VA) Administration expert to brief the community on Agent Orange at the next RAB meeting
- The RAB Executive Committee will decide how spill report summaries should be reported to the RAB.

Dr. Smith reminded all the RAB members and attendees of the upcoming RAB and TRS meetings. Mr. Silvas reminded the community that the RAB was trying to do its best to serve the communities around the former base.

Mr. Garcia stated that he had been sick, but that he was trying to do his best to serve his community. He added that the board member's emotions should be kept under control at all times during these meetings because there was a lot of work to do and much more to do in the future.

The meeting was adjourned at 8:50 p.m.

Draft
Restoration Advisory Board (RAB) Meeting Minutes
Former Kelly Air Force Base, TX
Greater Kelly Development Authority

May 11, 2004

Attendees:

Mr. Daniel Gonzales, RAB Community Representative
Ms. Esmeralda Galvan, RAB Community Representative
Ms. Sandra Converse, RAB Community Representative
Mr. Adrian Cortes, RAB Community Alternate
Mr. Mike DeNuccio, RAB Community Representative
Mr. Sam Murrah, RAB Community Representative
Mr. Michael Sheneman, RAB Community Representative
Mr. Pete Muzquiz, RAB Community Representative
Mr. Armando Quintanilla, RAB Community Alternate
Mr. Sam Sanchez, San Antonio Metropolitan Health District (Metro Health)
Ms. Kyle Cunningham, Metro Health
Ms. Linda Kaufman, Metro Health
Mr. Gary Miller, U.S. Environmental Protection Agency (EPA)
Mr. Mark Weegar, Texas Commission on Environmental Quality (TCEQ)
Ms. Abigail Power, TCEQ
Mr. Gary Martin, Greater Kelly Development Authority (GKDA)
Mr. Adam Antwine, RAB Government Co-Chair, Air Force Real Property Agency (AFRPA)
Mr. William Ryan, AFRPA
Ms. Norma Landez, AFRPA
Mr. Larisa Dawkins, AFRPA
Mr. Tim Sueltenfuss, Booz Allen Hamilton (Booz Allen)
Mr. Brendan Smith, Booz Allen
Mr. Scott Courtney, Booz Allen
Ms. Christine Best, Booz Allen
Ms. Susan Hook, Booz Allen
Ms. Stephanie Trevino, Booz Allen
Dr. David Smith, Smith and Associates (Facilitator)
Ms. Brittany Watts, Smith and Associates
Ms. LeAnn Herren, Smith and Associates
Dr. C.K. Tan, Southwest Research
Dr. K.C. Donnelly, Texas A&M University
Ms. Coriene Hannapel
Mr. Peter Hannapel
Mr. Alex Terrazas
Ms. Gloria Ramos-Cortes
Ms. Rose Ramos
Reverend Bee Dee Doublet
Mr. Ivan Boyer
Mr. Ben Galvan
Ms. Martha Cave

Members Absent:

Mr. Ruben Peña, RAB Community Co-Chair
Mr. Sergio Rodriguez, RAB Community Member
Mr. Rodrigo Garcia, RAB Community Member
Mr. Nazirite Perez, RAB Community Member
Mr. Robert Silvas, RAB Community Member

The meeting began at 6:40 p.m.

Welcome and Introductions**Dr. David Smith**

Dr. David Smith welcomed everyone and stated that there was a quorum present to begin the meeting. Mr. Armando Quintanilla asked what constituted a quorum. Dr. Smith said 50 percent of the community members must be present to form a quorum. The RAB board members discussed the issue and came to the agreement that there was a quorum to conduct the meeting.

Mr. Adam Antwine called the meeting to order. He led the audience in the Pledge of Allegiance and a moment of silence. He thanked everyone for coming to the meeting and apologized for the change in meeting location. Mr. Michael Sheneman introduced Mr. Alex Tarrazas, a student of his at Palo Alto who is going to serve as his alternate.

Dr. Smith reviewed the agenda and the supplemental packets. He explained that the community comment time would fall at the beginning of the meeting and invited all who wished to speak to fill out a comment card. The Spanish translators announced their services were available if needed.

Community Comment Time**Dr. David Smith**

Dr. Smith explained that he would be taking notes throughout the comment time to capture the questions the community asked. He said he would review the questions at the end of the meeting to make sure he had captured them correctly. He added that the Air Force would try to answer the questions towards the end of the meeting. The questions that were not answered at this meeting would be addressed at the next meeting in July.

Ms. Coriene Hannapel stated that this was her first time to attend a RAB meeting. She said she had contacted the Air Force Real Property Agency (AFRPA) earlier in the day and was told that the meeting location had changed from Kennedy High School Auditorium to the Greater Kelly Development Authority (GKDA) due to schedule conflicts. She said she was told that this issue would be discussed further at the meeting. She said the location change was not noted on the Web site, nor was the meeting agenda posted to the Web site. She added that the meeting agenda stated there was going to be a discussion on the fruit and nut sampling study, and had she known this, she would have brought her notes and questions about it. She said it would be helpful to have the agenda before the meeting and wanted to know how the public is usually notified of the meetings. She stated that she received a report from Mr. Doug Karas that said the permeable reactive barriers (PRBs) at Kelly are not working. She said she wonders if dichloroethene (DCE) and vinyl chloride (VC) are now being pumped into the groundwater. She said she wanted to

know what remediation has been planned for the water that has already gone through the PRB, and if it now contains DCE and VC that was not there before.

Dr. Smith explained that they would make notes of her concerns and hope to have a response to her within ten days.

Mr. Sheneman asked how Ms. Hannapel knows where the contamination is and why it is there. She reiterated that Mr. Karas gave her a report that stated this. She said the 2004 Semiannual Compliance Plan Report also states that the PRBs are not working or breaking down the chemicals properly. Mr. Sheneman said he does not understand why the community has not been told. He added that he attends every meeting and had not ever heard of this.

Mr. Quintanilla said that Mr. George Rice had brought it up at the April RAB meeting. Mr. Mark Weegar said that the only PRB that has been in the ground for any length of time is the one in Zone 5 on the eastern portion of Kelly. He said the one at Building 360 has been recently completed and there is probably not much data that can be gathered from it. The Zone 5 PRB is the only one that has been installed long enough to collect and analyze a substantial amount of data. Ms. Hannapel stated that she did not bring the reports with her, but that she would provide copies at the next meeting for those who are interested.

Ms. Rose Ramos said that she lives in the area near the railroad and heard that there was going to be a PRB installed near Commercial Street. She asked how many notification letters have been sent to the community to inform them of this and what the boundaries of the mailing area are.

Mr. Pete Muzquiz said he lives on Commercial Street and said he gets mailings about future Kelly projects all the time, not just because he is a RAB member. He added that he is confident that the Air Force spreads the word to notify the public.

Mr. Weegar said that the Air Force would get back to Ms. Hannapel about a specific contact number for the Commercial Street outreach.

Mr. Adrian Cortes asked what the information looks like. Mr. Muzquiz explained that he has received postcards, flyers, and other materials that invite the public to attend RAB meetings, go on tours of the base, and see construction project sites.

Mr. Antwine explained that the Air Force has been meeting with a mailing company to get a specific number of addresses for that area. The information will say what the PRBs are, what they are going to be doing, and where. He added that the products are still in the development stages, but once finalized, will be released to the public.

Fruit and Nut Sampling Results

Ms. Kyle Cunningham

Ms. Kyle Cunningham introduced herself as the Program Manager for the Public Center for Environmental Health (PCEH), which is part of the San Antonio Metropolitan Health District (Metro Health). She gave a quick overview of the contamination at Kelly and listed the main contaminants of concern: trichloroethylene (TCE), tetrachloroethene (PCE), and 1,2-DCE and VC. The Air Force began a survey of the fruits and nuts produced in the area in 2001 in

response to the community concerns about the uptake of these chemicals into their homegrown fruits and vegetables. They analyzed a total of 47 samples, which included bananas, chili peppers, citrus, figs, pears, and pecans. Most of the samples collected were pecans. She said Dr. C.K. Tan with Southwest Research performed the testing.

Ms. Cunningham explained that the community was concerned that some of the other garden vegetables from the area were not tested. In January 2003, they collected more samples to include all the original samples, plus tomatoes and cacti. She stated that the goal was to collect and analyze a seasonal variety of fruits, vegetables, and nuts for the chemicals of concern. She explained the testing process and showed pictures of the scientists collecting the samples. She said that the conclusion drawn from the sampling was that there were no significant levels of contaminants in the fruit and nuts analyzed. She said the produce is safe to eat and, as always, it should be washed whether it is homegrown or purchased at the grocery store. She said the report will be available on the Web site. She said they would also have hard copies at the Environmental Health and Wellness Center (EHWC), AFRPA, and PCEH in case anyone wanted to review it.

Ms. Sandra Converse asked how the sample size was determined. Ms. Cunningham said the sampling size included a good sample, especially considering that they did not see any alarming trends.

Mr. Weegar stated that considering what was available in the area, it was a good sample size. Ms. Converse asked if they only chose healthy specimens. Ms. Cunningham said they sampled everything in variation. Dr. K.C. Donnelly, from Texas A&M University, said that they tested diseased as well as healthy-looking samples. He added that the most important thing is that all the samples showed nondetect for the contaminants of concern.

Ms. Esmeralda Galvan asked what other chemicals were tested besides those of concern. Ms. Cunningham said they ran the complete panel for volatile organic compounds (VOCs). She added that they did not test for any other chemicals than those of concern because those would not be from the former Kelly AFB.

Ms. Galvan voiced conflict of interest concerns about Southwest Research because they have connections to the government. Mr. Gary Martin explained that Southwest Research is not a government entity, but rather an independent contractor. Ms. Galvan then asked if the same test could be done from another independent laboratory to see if the same results come back. Ms. Cunningham said it was a patented method so another laboratory probably could not use it. She added that their goal was to find the very best method available to test. She concluded that PCEH was confident in the testing method and the results.

Ms. Galvan asked why they tested outside the plume area. Ms. Cunningham explained that the main reason was because the plume changed in size and location over the course of testing, but also so they could have a comparison.

Mr. Mike DeNuccio asked how Southwest Research was selected to do the job. Ms. Cunningham said they were a sole source contract because of the patented method, but they did review other bids. Mr. DeNuccio agreed that Southwest Research has an impeccable record.

Ms. Gloria Ramos-Cortes said that her father gave her a pecan tree and told her it would produce pecans within five years. She said it has been ten years and the tree has hardly produced anything. She said she believed that this is because of the contamination. She asked if they are testing the roots and the tree itself, not just the fruits and nuts.

Mr. Weegar said that the process of phytoremediation pulls the VOCs through the roots and up into the leaves. They are released into the air and do not harm the plant. Ms. Cunningham said her main concern for doing the testing was to address the community concerns. She added that the study is about the chemicals getting into the food chain. She concluded that her funding is better spent focusing on things that impact the health of the surrounding community.

Ms. Galvan asked about the air sampling. Ms. Cunningham said that PCEH had a contractor on site during the 34th Street PRB construction that was conducting air monitoring the entire time for particulates and VOCs. She added that they are working on getting a particulate monitor for the area.

Mr. Quintanilla asked if the fruit and nut final sampling report is going to be sent to the Agency for Toxic Substances and Disease Registry (ATSDR) for comments and inclusion in the final public health assessment for the surrounding area. Ms. Cunningham replied that she had not thought about that because she was afraid that it would delay their already lagging process. Mr. Quintanilla said that ATSDR has to release the final health assessment and they may need more studies to add to it. He suggested that PCEH consider sending it and Ms. Cunningham said she would.

Ms. Cunningham said that PCEH ran into a Food and Drug Administration (FDA) five-year study during their research. She said it was released in 2003 and illustrated that FDA analyzed 70 foods between 1996 and 2000 for VOCs. She added that these foods were purchased from grocery stores and that VOCs were detected in every sample. The FDA concluded that much higher doses are inhaled through cigarette smoke, gasoline fumes, and industrial pollution than ingested through foods. She concluded that homegrown garden foods might prove better than grocery foods. She provided contact information and encouraged the community to visit the FDA's Web site.

Community Comments Revisited

Dr. David Smith

Dr. Smith outlined the reason for the change of meeting location. He stated that Kennedy had planned a band concert in their auditorium for the evening, and due to this schedule conflict, the RAB had to be moved. He stated that Ms. Brittany Watts worked with Kennedy High School and the Edgewood Independent School District superintendent's office to find another auditorium; however, they had nothing available. Ms. Watts scheduled the new location at GKDA because other RAB meetings have been held there and most members were familiar with the location. He added that Ms. Watts advertised the change in local newspapers, sent out public service announcements, and sent e-mail and hard copy notices to RAB members (with directions) in their material packets. There was also a person at Kennedy who posted signs and handed out directions.

Operating Guidelines Update

Task Committee

Dr. Smith invited Mr. Muzquiz to explain the progress with the operating guidelines task committee. Mr. Muzquiz explained that the RAB members were given the opportunity at the April meeting to make comments about the suggested changes to the operating guidelines. He said he had not received any response from anyone. He added that those people who make the most noise about the operating guidelines always fail to show up to the special meetings held to address them. He said changes do not have to be made, but cannot be made unless everyone votes and discusses what is going on with the operating guidelines. He pointed out that people who do not attend meetings have no grounds to complain.

Ms. Galvan asked why the operating guidelines were being changed to begin with. Mr. Muzquiz responded that there was language that needed to be updated to suit what the RAB wants to accomplish.

Mr. Antwine said he thought that it was the election process that prompted the need to look at the operating guidelines again. Mr. Quintanilla said he thought the language had been corrected. Mr. Antwine said it has been, but the board has not approved the revisions. Mr. Quintanilla said he understood that the operating guidelines will need to be corrected once the *Draft Revised Proposed RAB Rule, January 2004* was approved as final. He suggested that the RAB wait until the *RAB Rule* was final before making changes. Mr. DeNuccio stated that they are planning on waiting on the final *RAB Rule*, but could tackle the few key changes to move forward until it is final. He said they at least need to look at the Technical Review Subcommittee (TRS) elections to be prepared for the upcoming meeting in June. He added that then they could come back at a later date and do a comprehensive review of the charter once the *RAB Rule* is final.

Mr. Quintanilla said he does not agree with the purpose stated in the addendum. He said the RAB is not a decision-making body. Mr. Gonzales said the purpose has to come out of the *RAB Rule*. Mr. Weegar said that the RAB has always been and will continue to be a mechanism for the community to provide advice on the cleanup. The community does not have decision making authority.

Mr. Cortes said he did not see anything in the operating guidelines that offered help to the sick people in the community. Mr. Weegar said it is not within the parameters of the RAB. Mr. Cortes said that there should be more interest in the health of the community.

Mr. Sam Sanchez agreed that there is illness in the community, but he cannot speak to that being added to the goals of the RAB operating guidelines. He said since 1988 to the present, there have been many studies and assessments to determine the relationship between the former Kelly AFB and the health of the community. He said he believes that ATSDR will continue to do assessments on health problems in the area. He said there are illnesses present, but finding a correlation is difficult. He invited people to come to the EHWC. He stated that he was thankful for the people that come in and take time out of their busy lives to contribute to the information being collecting.

Mr. Weegar stated that everyone present can recognize that there are ill people in the community. He added that it is difficult to talk about providing assistance and compensation to

ill people in the area when there is no direct linkage between the Kelly contamination and health impacts.

Mr. DeNuccio asked if the board could get back on schedule and discuss operating guidelines changes. He moved that the RAB approve to change the title from charter to operating guidelines and accept the new subcommittee meeting wording.

The board voted on a motion to accept the changes and it carried 5 to 3.

Dr. Smith stated that amendments to the operating guidelines must be accompanied by 2/3 majority vote. He said there is not a 2/3 majority present to accept the motion and it failed. Discussion followed about who can vote. Mr. Weegar stated that government representatives have never voted and will continue to abstain from voting. It is a matter of policy that TCEQ and EPA do not participate in any vote by the board. He stated that they are solely there to provide information to the RAB and try to answer questions from the community. The board discussed the voting procedures and decided that the operating guidelines discussion should wait until more members can be present for further discussion.

Mr. Quintanilla asked who was going to be the chairperson at the TRS meeting on June 8. Mr. Antwine said the community co-chair would fill the role until a TRS chair is established.

Site S7 Briefing

Mr. Scott Courtney

Mr. Scott Courtney introduced himself as a consultant to the Air Force through Booz Allen. He said he has been working at Kelly for six years and has focused on East Kelly and the off-site groundwater contamination. He said he put together this presentation to address community concerns that were brought up at the April RAB meeting regarding the Site S-7 herbicide storage area. He added that it is also referred to as the Installation Restoration Program (IRP) site SSO09. He explained that the whole area of East Kelly was part of the investigation. However, it was only a two-acre site on the southwest corner of East Kelly where the herbicide was stored. He said in the 1960s and 70s during the Vietnam War, Kelly was a depot for herbicides like Agent Orange. The site was utilized for two years. The total number of drums stored there was not documented, but it is known they were stored there for general operations. The drums were stored on wooden pallets. When the mission was completed, they were shipped to Johnson Island and disposed of on an incinerator ship.

Ms. Galvan asked why the number of drums was not documented. Mr. Courtney replied that the information he has is from the restoration activities, and he does not have all the records of every drum, pallet, or piece of equipment that passed through Kelly.

Mr. Quintanilla asked how many drums would fit in two acres. Mr. Courtney said it all depended on how they stacked them. Mr. Courtney said they conducted environmental investigations long after the drums were gone. He added that it was not relevant to know the number of drums that came in and out of the base because it was not within the scope of their investigation.

Mr. Cortes asked what type of drums they were. Mr. Courtney replied that they were 55-gallon drums. He added that a number of investigations were done at the site. One of the findings was that the drums did leak due to the expansion and contraction caused by the heat in South Texas. Mr. Cortes said he is not familiar with the area and asked what type of facility they are referring to. Mr. Courtney replied that it is a recreational facility for base personnel.

Mr. Courtney reviewed a summary of investigations that were conducted at the site. He said in 1982, the Air Force was doing record searches during phase I of the investigation to determine what materials were sorted and how they were handled. It was at this time that there was some indication that these drums were stored at Site S-7. In 1991, there was an initial site investigation report. After samples were collected, it became apparent that some of the drums could have leaked. The site-specific Environmental Baseline Survey (EBS) was conducted in the region and there was an effort to transfer the property to Railcar America. The information was reviewed again in 1996 for property realignment. In 1997, the bulk of the investigation was conducted at the site. He said they identified the chemicals of concern, compared them to the regulatory standards, determined what type of cleanup was needed, and then conducted the cleanup, and submitted the closure report to the state and EPA for approval.

Mr. Cortes asked what chemicals of concern were located there. Mr. Courtney replied that the first investigation in 1991 reported that this was the only location where the herbicide drums were stored. He said there were elevated levels of inorganics like metals and arsenic, as well as low levels of dioxins. There was a preliminary risk assessment done at that time that evaluated the concentrations and resulted in a low level of health risk. They did find that there were potential existing and future migration pathways, as well as potential human receptors. It was recommended that they conduct additional sampling to fully characterize the nature and extent of the contamination.

Mr. Courtney explained that chemicals of concern are those chemicals that are detected at the site at concentrations that exceed regulations. He said they sampled for a wide range of chemicals. None of the dioxin contaminants found were above the risk reduction standard values that would require any remedial action. Arsenic was detected in 41 of the 48 samples in the area; 27 of the detections were above the cleanup standards. Kelly conducted a cleanup to meet residential standards. He said the Air Force excavated 3,000 cubic yards of soil that was properly disposed of and the Texas Natural Resource Conservation Commission (now the TCEQ) approved closure of the site in 1997.

Announcements

Mr. Sheneman said he wanted to thank the staff at AFRPA for the tours he has been on recently at Kelly. Mr. Martin could not be present for the GKDA update. Mr. Sanchez said he left some flyers on the sign-in desk that invite the community to attend the workshop with PCEH on June 26, 2004, at Our Lady of the Lake University. He said the workshop would focus on the environmental and economic issues affecting the south side of the city.

Mr. Antwine said there were posters in the entryway that show the plume comparisons from 1999 up to now. He said the Air Force is looking to illustrate the cleanup progress in a simple way and the posters help to do that. He said there is a large program in effect this year to install

cleanup remedies for the off-base part of the contaminant plume. He said the Air Force expects to have all the groundwater treatment systems in place this year.

Ms. Norma Landez gave the Base Realignment and Closure (BRAC) Cleanup Team (BCT) update. She said they discussed the basewide ecological assessment of Zones 1, 2, 3, and 5. They concluded that there is no risk to the aquatic and omnivorous birds along Leon Creek. She stated that they submitted the ecological risk assessment to the agencies at the end of April and it will be available at the PCEH office soon. She said they also discussed an update on the Building 361 radiation. They are waiting for Boeing and GKDA to provide them with the report to submit to the agencies. They were provided a review of the Zone 1 Corrective Measures Study by a contractor at Lackland AFB. This report was also reported to the community at their council meeting last month. That will be available in public libraries and will also be submitted to the regulators this month. They also discussed the Agent Orange storage issue that arose at the April RAB meeting. She explained that they reviewed all documentation and could not find any storage of Agent Orange in two warehouses. She said the Air Force installed monitoring wells along the Building 360 PRB and should get samples of groundwater in the next couple of weeks. Upon approval, the BCT minutes will be provided at the next RAB meeting.

Mr. DeNuccio stated that there is confusion on which RAB members can vote. He said the bigger question that needs to be raised is whether the government members want to be considered as voting members. He said that since they do not have that answer at this time, they will have to take it up at the next meeting. The operating guidelines need to be evaluated to determine who is a voting member before the RAB can proceed with any changes to them.

Meeting Wrap-Up

Action Items from May 2004 RAB Meeting

- Air Force will evaluate the EBS for references to storage of Agent Orange at Kelly
- The Air Force will invite a Veterans Affairs (VA) Administration expert to brief the community on Agent Orange at the next RAB meeting (*Deferred to July meeting*)
- The RAB Executive Committee will decide how spill report summaries should be reported to the RAB.

Action Items for July 2004 RAB Meeting

- The Air Force will invite a VA Administration expert to brief the community on Agent Orange at the next RAB meeting

Dr. Smith reminded all the RAB members and attendees of the upcoming RAB and TRS meetings.

The meeting was adjourned at 10:10 p.m.



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Speaker's Presentation Guidelines

- The facilitator will announce to the audience that all questions will be answered **after** the presentation.
 - Please **do not accept any questions** during your presentation.
 - If audience members are insistent, please reiterate that all questions will be answered **after** the presentation is finished. *Please turn to the facilitator if you need assistance.*
 - Adhering to a strict question-and-answer period after a presentation helps everyone in the audience to:
 - Show respect for the presenter
 - Stay focused on the presentation
 - Understand the progression of ideas in the presentation
 - Receive information that is pertinent to everyone, not to a specific individual
-





January 2004 Semiannual Compliance Plan Report (July-December 2003)

Report Summary

Presentation to the RAB
July 20, 2004








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Tonight's Presentation

- Discuss the scope and content of the 2003 Annual Compliance Plan Monitoring Report
- Types of data collected
- Tools used to evaluate the data
- Summary of the results
- Reports are available at:
 - Downtown Public Library
 - Community Health Clinic
 - Technical review subcommittee







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Project Scope

*January 2004 Semiannual Compliance Plan Report
(July-December 2003)*

- Fulfill the monitoring and reporting requirements of the Compliance Plan issued by the TCEQ
- Provide an annual “snapshot” of groundwater plumes and Leon Creek
- Used for recovery system evaluation
- Number of data points is about 110,000





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What this Report/Presentation Does Not Cover

- Selection of remediation methods
- Design of remediation methods
- Scheduling of remediation
- Air monitoring
- Source determination






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Compliance Monitoring

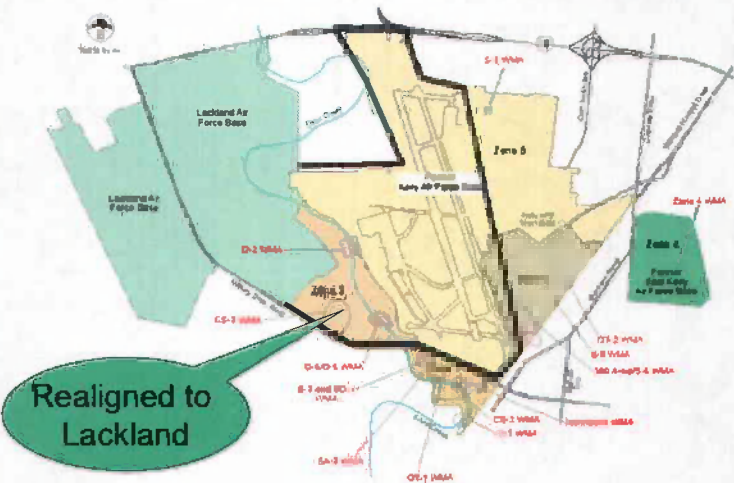
- **Groundwater Monitoring**
 - **14 Waste Management Areas**
 - **WMAs are groups of sites called Solid Waste Management Units (SWMUs)**
 - **These sites are also referred to as IRP Sites by the Air Force**
 - **4 RCRA-permitted units**
- **Surface water, sediment and biological monitoring of Leon Creek**

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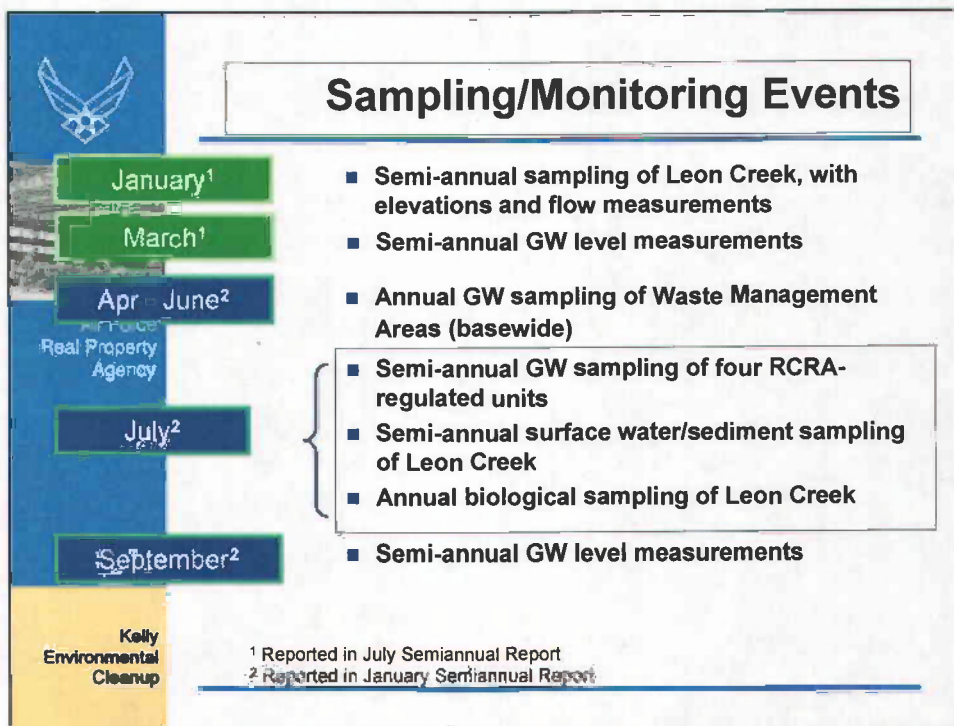
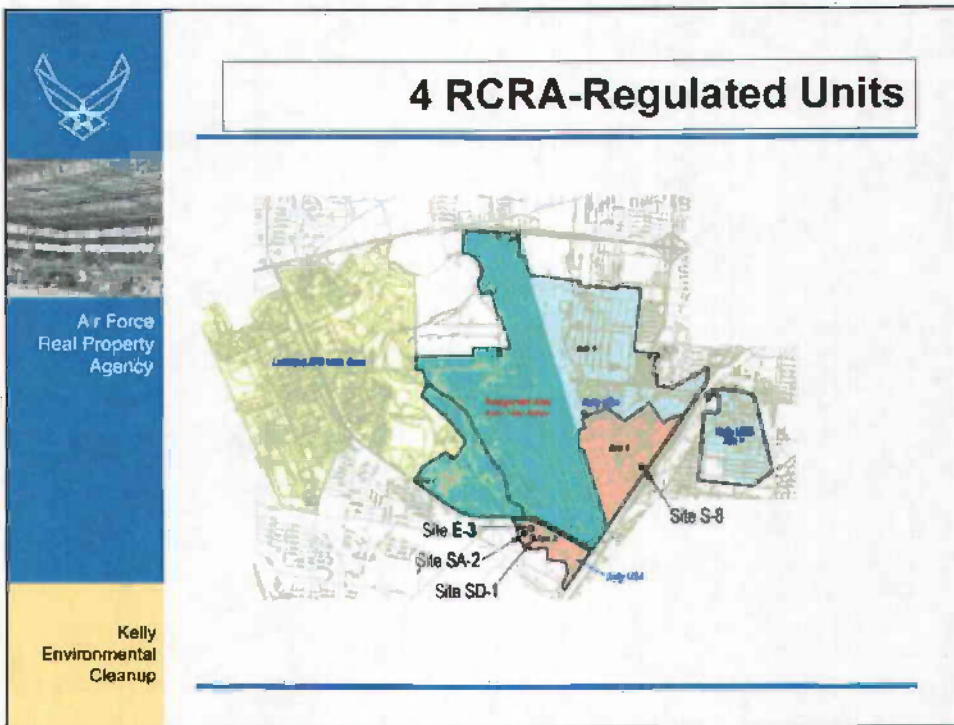
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Waste Management Areas



Realigned to
Lackland

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Annual WMA Sampling

- Sampled 461 monitoring wells on and off-base during April – June 2003
- Samples sent to a laboratory for analysis of a broad range of chemicals including:
 - volatile organic compounds (VOCs),
 - semi-volatile organic compounds (SVOCs),
 - metals, cyanide, pesticides, and polychlorinated biphenyls/PCBs (Zones 1 & 2 only)
- Also field parameters
 - oxygen, redox potential, turbidity, pH, conductivity and temperature

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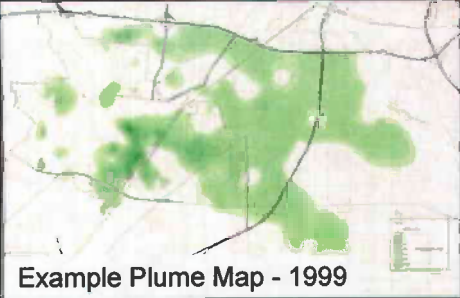
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2003 Results for the Annual Sampling

We use plume maps as the primary tool for evaluating changes in groundwater

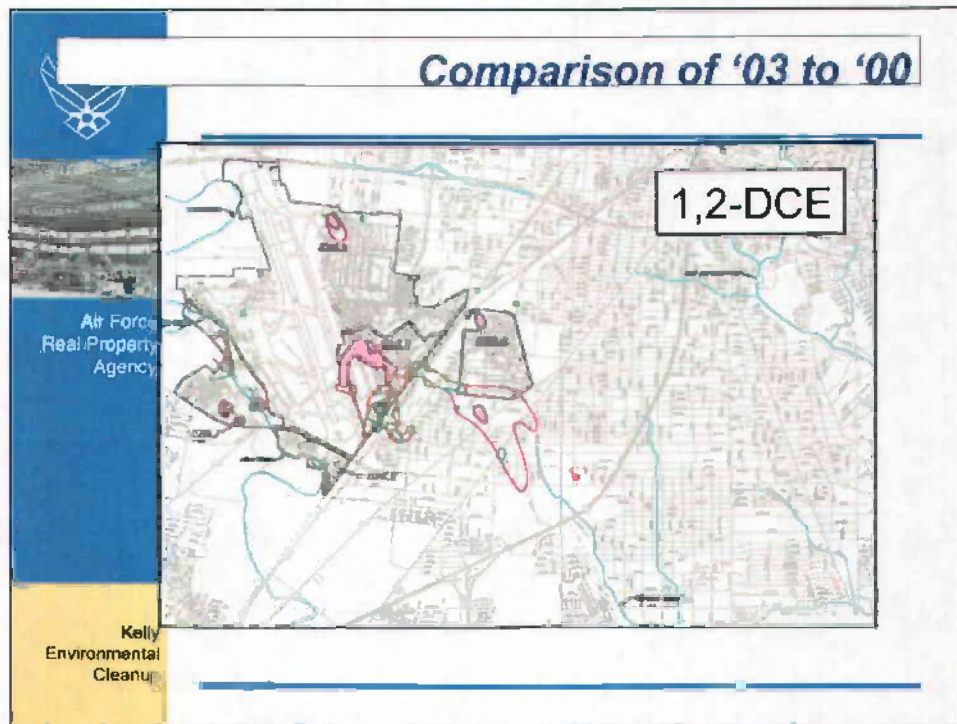
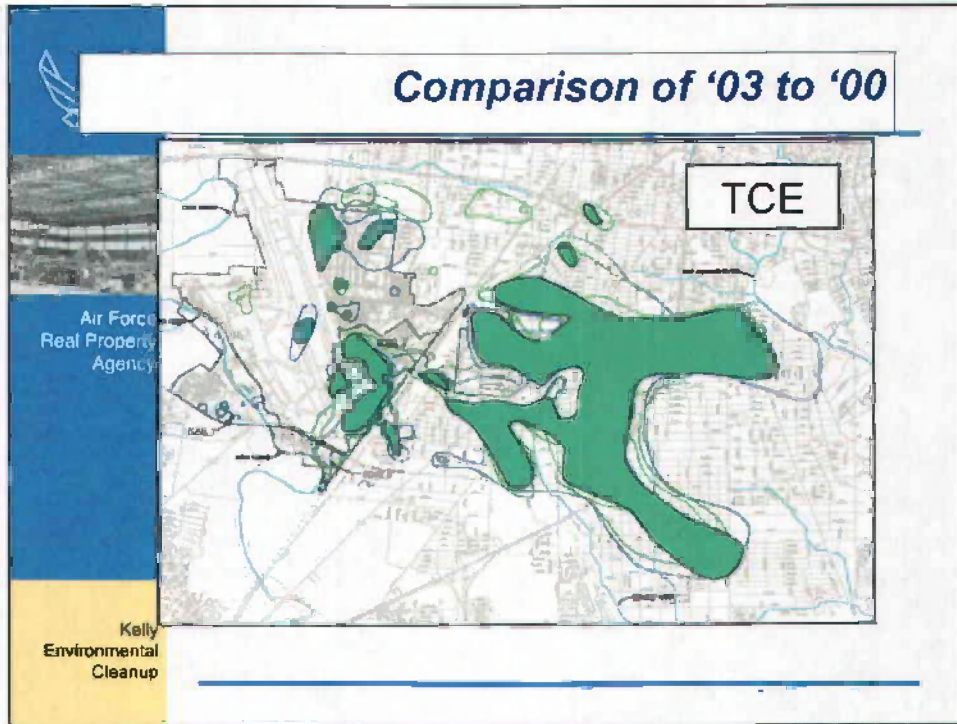
Decreases in the magnitude and extent of chlorinated solvents in the source areas and downgradient of the remedial systems has been shown to be occurring in the following areas:

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Example Plume Map - 1999

- Zone 4 off-base
- Around recovery systems in Zone 2 near Leon Creek
- WP022 (E-3) Source area - remaining steady
- Downgradient of Site SS040 (MP)



Semi-annual Sampling of four RCRA Units

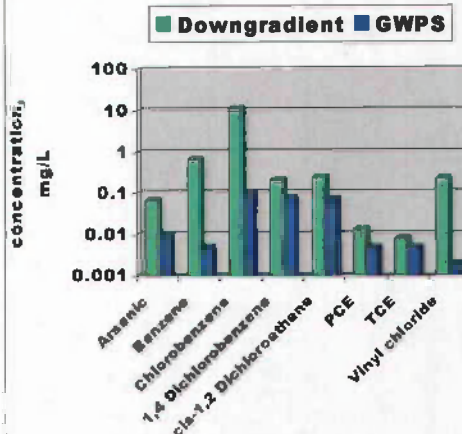
- Sampled 40 monitoring wells during July 2003
- Wells monitor the following sites:
 - SA-2, SD-1 and E-3 (Zone 2)
 - parts of the old industrial wastewater treatment plant
 - all of the structures/wastes have been removed and pits backfilled
 - SA-2* and SD-1 have achieved remediation goals
 - E-3 undergoing active soil and groundwater remediation
 - S-8 (Zone 3)
 - used to have underground storage tanks for fuel and solvents
 - area once used for engine parts cleaning
 - fuel and solvents are in the groundwater
 - fuel and groundwater are being remediated

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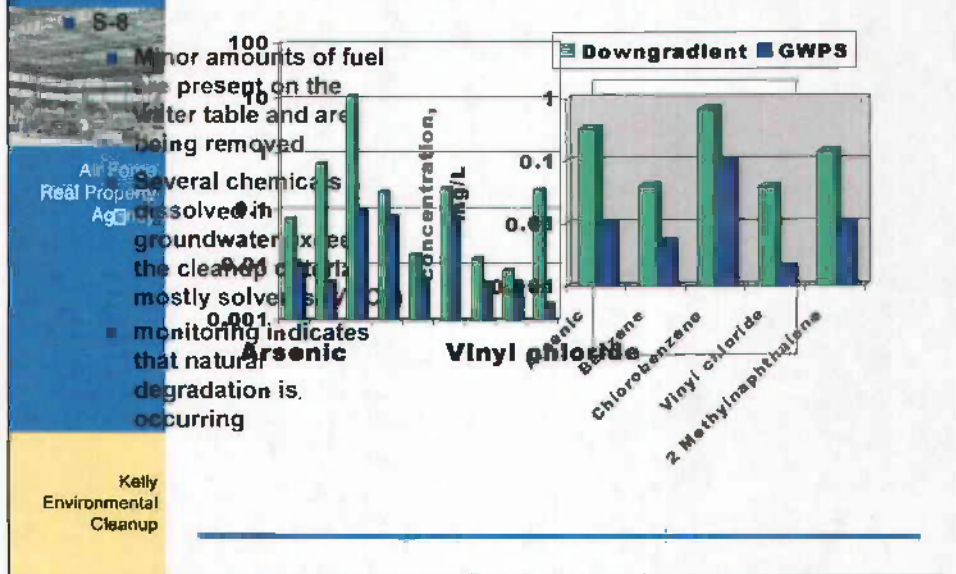
* closure pending approval of ecological risk assessment

RCRA Sampling Results

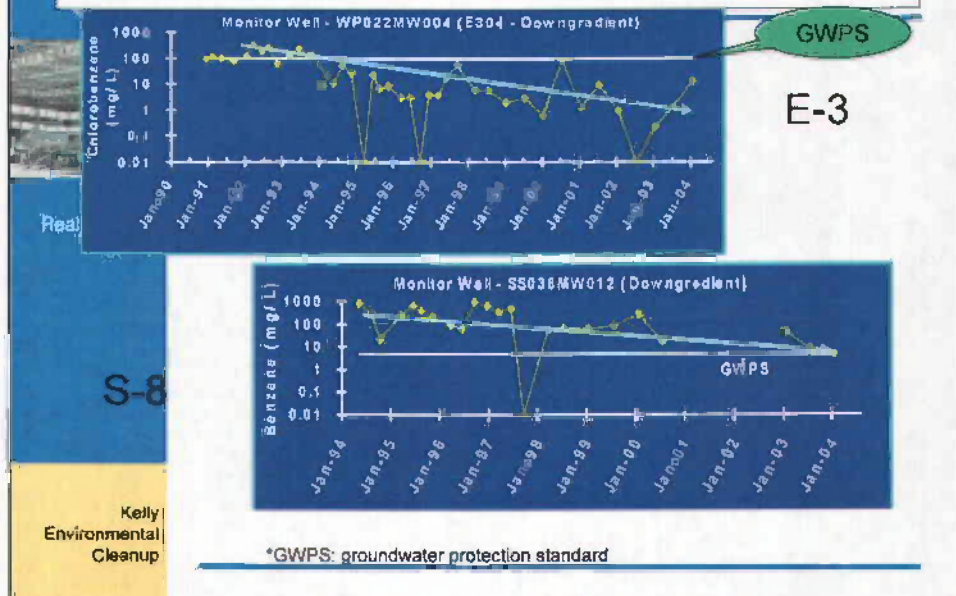
- E-3
 - Several chemicals dissolved in groundwater exceed the cleanup criteria, mostly solvents (VOCs)
 - VOC concentrations in the shallow groundwater have been reduced overtime and now remain stable and confined within the recovery system perimeter



RCRA Sampling Results



Examples of Remediation Progress



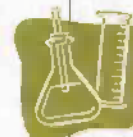
Semi-Annual Water Level Measurements

- **Why?**
 - **Water level measurements are used to create maps from which groundwater flow direction and rate can be evaluated**
 - **These maps are also used to evaluate effectiveness of groundwater pumping systems**
 - **About 400 wells were measured during September 2003**
 - **Wells were also checked for free product**
 - **“free product” refers to an oily material that may be fuel or cleaning solvents**

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Leon Creek Monitoring

- 1. Physical Assessment**
 - **elevation and flow measurements**
- 2. Chemical Assessment**
 - **water, sediment and fish tissue**
- 3. Biological Assessment**
 - **toxicity and habitat**



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Physical Assessment of Leon Creek

- During July 2003 we measured:
 - Stream flow in 4 segments.
 - Flow from selected seeps(6) and outfalls(5).
 - Surface water elevations at 23 stations.
- Created sketches and took photographs to document changes in the stream's physical appearance.



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Chemical Assessment of Leon Creek

- During July 2003 we sampled:
 - 31 surface water stations
 - 28 sediment stations
 - 8 outfalls and 5 seeps
 - Sample analyses:
 - VOCs, SVOCs, metals, cyanide, pesticides/PCBs,
- General Chemistry:**
- alkalinity, BOD, COD, chloride, chlorine, fecal coliform, hardness, MBAS, ammonia, nitrate, nitrite, oil/grease, phosphate, phosphorous, sulfate, TDS, TOC, TPH



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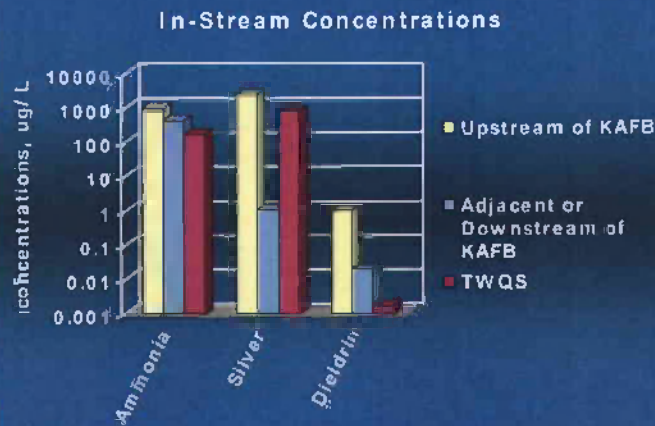
Leon Creek Sampling Results

- Initial screening against the Texas Water Quality Standard (TWQS) guidelines
 - 3 surface water and 27 sediment chemicals exceeded the criteria
- Chronic toxicity results showed potential surface water and sediment toxicity at some of the stations
- Ecological risk assessment has shown that the majority of the toxicity is due to habitat limitations, not chemical impacts

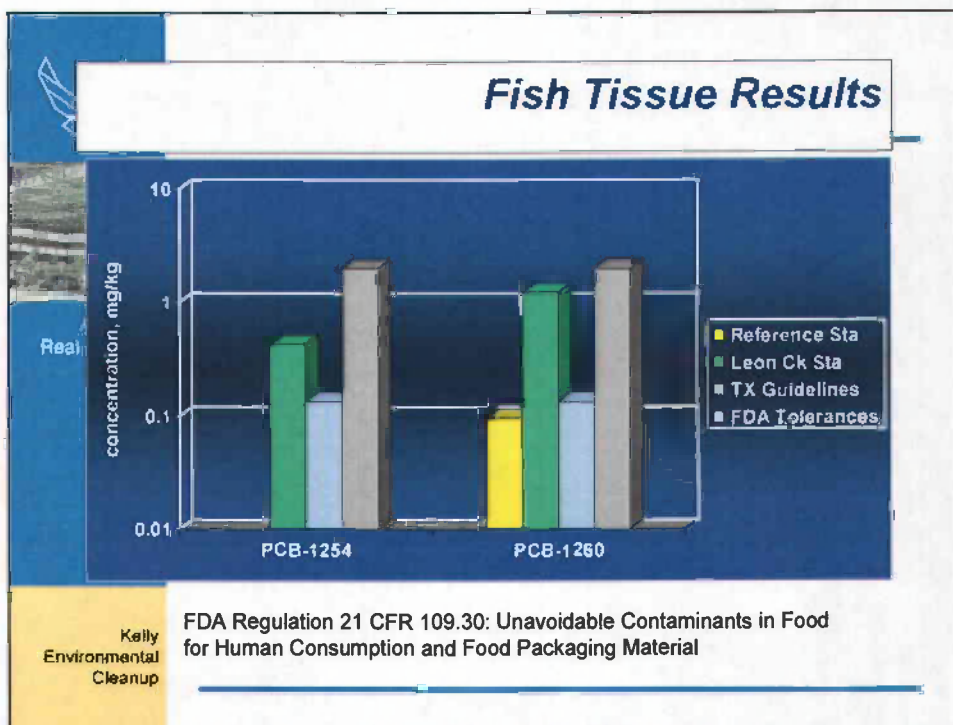
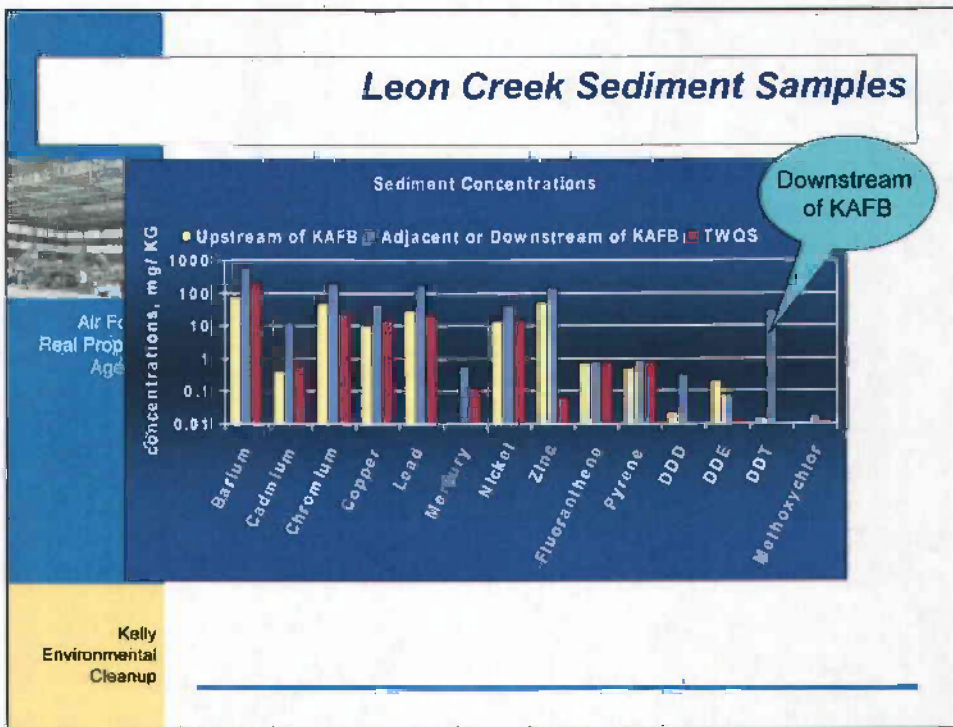


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Leon Creek Water Samples



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Biological Assessment of Leon Creek

- During July 2003 we conducted the following tests at 8 stream stations and 3 reference stations* :
 - Chronic Toxicity
 - Fish tissue
 - EPA Rapid Bioassessment



* Reference stations: Medio and Salado Creeks, Medina River

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Leon Creek Biological Assessment Results



- Aquatic Life Designation:
 - Medio station is meeting its aquatic life use designation, which is Intermediate Aquatic Life, unlike
 - Leon, Medina and Salado stations do not meet High Aquatic Life designation
- PCBs were the only exceedances of TWQS guidelines in the fish tissue samples
 - whole body samples (not fillets)
 - below the FDA tolerance for PCBs in the edible portion of fish

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Leon Creek Monitoring

- Small, shallow, slow moving urban stream flowing through western San Antonio
- Lack of tree cover causes high water temperatures, which reduces the amount of oxygen in the water
- Highly susceptible to flash flooding
- Receptacle for urban runoff



Adjacent to KAFB

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Leon Creek



- Trend analysis shows that Leon Creek has remained fairly constant over the years
- A final Tier 2/Tier 3 Ecological Risk Assessment report was submitted to the regulators the first week of May (2004)
- Findings of the report show no elevated risks to the ecological receptors in Leon Creek from the chemicals

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Questions ??



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Report Available for Review at:

- (1) Public Library - Downtown
Central Library - Government documents
(2nd floor)
600 North Soledad St.
- (2) Environmental Health and Wellness Center
911 Castroville Road

SECTION 1.0

January 2004 Semiannual Compliance Plan Report (07/03 – 12/03) Overview

1.1 Introduction

On 12 June 1998, the Texas Commission on Environmental Quality (TCEQ--formerly Texas Natural Resource Conservation Commission, or TNRCC) issued the Hazardous Waste (Post-Closure Care) Permit No. HW-50310 and Compliance Plan No. CP-50310 for the former Kelly Air Force Base (AFB), Texas. The Compliance Plan requires the former Kelly AFB to complete and deliver a *Semiannual Compliance Plan Report* to the TCEQ for each semiannual period (January through June, and July through December) of each year. The Compliance Plan requires this report to include all environmental sampling results and remedial activities completed during the semiannual period. This *January 2004 Semiannual Compliance Plan Report* covers the July through December 2003 semiannual period in addition to the April through June basewide annual sampling event. All data and evaluations derived from the annual sampling of the solid waste management units (SWMUs) (Compliance Plan Section VI. C.3.a.ii) are incorporated into this January Semiannual Compliance Plan Report.

This part of the *January 2004 Semiannual Compliance Plan Report*, Part I: Introduction, includes the following information:

- Brief descriptions of Parts II (Leon Creek), III (RCRA Sampling), and IV (Annual Basewide Sampling)
- Cross-reference table identifying the Compliance Plan requirements and their location within this report
- Historical background and overall description of the former Kelly AFB
- Summary of findings for Parts II, III, and IV
- Master contents list (Appendix A)
- Master acronyms list (Appendix B)
- Master exhibits list (Appendix C)
- Master appendixes list (Appendix D)
- Master references list (Appendix E)
- Proposed compliance plan schedule (Appendix F)

1.2 Organization of the January 2004 Semiannual Compliance Plan Report (07/03 – 12/03)

To facilitate accessibility, this report is divided into four parts: Part I: *Introduction*; Part II: *Leon Creek Semiannual Assessment*; Part III: *Semiannual Groundwater Assessment for Resource Conservation and Recovery Act (RCRA)-Regulated Units*; and Part IV: *Annual SWMU Assessment and Statistical Evaluation*. These parts are differentiated by color-coding; however, Part I: *Introduction*, Part II-*Leon Creek*, and Part III-*RCRA* are now located in the same notebook. The following three subsections describe the contents of Parts II through IV.

1.2.1 Part II: Leon Creek Semiannual Assessment

The former Kelly AFB initiated a monitoring program for Leon Creek in 1989 to document the chemical, physical, and biological conditions of the creek upstream, adjacent, and downstream from the base. The monitoring program continues today, as stipulated in the Compliance Plan, and documents existing conditions and trends in the creek's water, sediment, habitat, and biological quality. Part II summarizes the results of the Leon Creek data-collection activities that took place in July 2003. These activities included surface water and sediment sampling, biological monitoring, and surface water elevation and flow measurements. In addition, the Leon Creek monitoring program supports the *Annual SWMU Assessment and Statistical Evaluation* and its evaluation of the effectiveness of ongoing groundwater remediation efforts at the former Kelly AFB.

1.2.2 Part III: Semiannual Groundwater Assessment for RCRA-Regulated Units

The former Kelly AFB conducted semiannual groundwater monitoring on four RCRA-regulated units to evaluate the effectiveness of its ongoing groundwater remedial activities and fulfill Compliance Plan requirements. Part III summarizes the July 2003 field and laboratory results for the four RCRA-regulated units.

Prior to issuance of the Compliance Plan in June 1998, the former Kelly AFB conducted quarterly RCRA groundwater monitoring events. The last quarterly RCRA groundwater-monitoring event took place in March of 1998. After the TNRCC (now TCEQ) issued the Compliance Plan, the former Kelly AFB implemented a semiannual RCRA groundwater monitoring event schedule, which involved monitoring events in January and July of each year. This *Semiannual Groundwater Assessment for RCRA-Regulated Units* discusses the groundwater monitoring conducted in July 2003.

1.2.3 Part IV: Annual SWMU Assessment and Statistical Evaluation

The *Annual SWMU Assessment and Statistical Evaluation* includes results and summaries for the data collected during the April through June 2003 annual basewide sampling event (sampling of SWMUs). For this event, analytical data from 484 wells (including the 40 RCRA data points) described the distribution of organic parameters in the surficial aquifer at the former Kelly AFB. Data from 484 of these wells (including the 40 RCRA data points) determined the distribution of inorganic parameters. This report also considers site hydrogeology, including groundwater and surface water interaction.

Exhibit 1.1 is a cross-reference table that specifies where the requirements stipulated in the Compliance Plan can be found in each part of this report. Exhibit 1.2 lists the Compliance Plan modifications.

1.3 Historical Background

Established on 7 May 1917, the former Kelly AFB was the oldest continuously active airfield in the United States Air Force (USAF). The base's primary mission was to support the San Antonio Air Logistics Center (SA-ALC). The SA-ALC was one of the major Air Force Materiel Command organizations providing large-scale logistics support to USAF installations worldwide. The center managed aircraft engines, weapons systems, support equipment, and aerospace fuels. Also, many aircraft were maintained and repaired at the former Kelly AFB. The former Kelly AFB also hosted more than 50 tenants representing the USAF, United States Army, Department of Defense (DOD), and other government agencies.

The former Kelly AFB was recommended for realignment and closure by the 1995 Defense Base Realignment and Closure Commission. The Commission's recommendations were accepted by the President and submitted to Congress on 13 July 1995. As Congress did not disapprove the recommendations in the time given under the Defense Base Realignment and Closure Act of 1990, the recommendations were required by law to be implemented. The former Kelly AFB closed on 13 July 2001. The flightline and areas west have been realigned to Lackland AFB and have become the Kelly Field Annex of Lackland AFB.

A Programmatic Disposal Environmental Impact Statement (PDEIS) was developed to evaluate the impacts associated with the disposal and subsequent reuse of the portions of the former Kelly AFB east of the airfield as well as an area to the south of Military Highway. The Record of Decision (ROD) for this PDEIS, as well as an Economic Development Conveyance, and Lease in Furtherance of Conveyance for the property to be transferred to the Greater Kelly Development Authority (GKDA) were signed on 24 July 1997. The Economic Development Conveyance is the contract through which the property will be transferred to the GKDA once all necessary remedial actions have been installed by the Air Force and are determined to be operating properly and successfully.

The Lease in Furtherance of Conveyance grants beneficial occupancy of property to the GKDA as the USAF no longer requires such property for its mission, but cannot yet transfer the deed. The GKDA has subleased significant portions of the former Kelly AFB to the Boeing Company, Pratt & Whitney, Lockheed Martin, General Electric, EG&G, Ryder International Logistics, MQS Inspections, and other private and public entities.

The former Kelly AFB initiated environmental restoration activities in 1982 under the USAF's Installation Restoration Program (IRP). The purpose of the IRP is to identify and remediate historically contaminated sites following the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. For the IRP, the former Kelly AFB is divided into five groundwater zones (Exhibit 1.3). 60 IRP sites associated with past base operations have been identified in these five zones.

EXHIBIT 1.1
Compliance Plan Checklist of Semiannual and Annual Reporting Requirements
Former Kelly AFB, Texas

Compliance Plan Paragraph No.	Requirement	Location in January 2004 Semiannual Compliance Plan Report (July - December 2003)
V.B.1	If a groundwater recovery well system is used in the overall corrective action system, the flow rate for each recovery system shall be recorded or calculated and documented once a week. The weekly flow rate data shall be used to calculate a semiannual total flow that shall be reported in accordance with Section VII.B.2.f.	Part IV: Appendix N
VII.B.1	<p>Water table maps shall be prepared from the groundwater data collected pursuant to Section VI (semiannual for regulated units and annual for solid waste management units) and shall be evaluated by the permittee with regard to the following parameters:</p> <ul style="list-style-type: none"> a. Development and maintenance of a cone of depression during system operation b. Directions of groundwater flow c. Effectiveness of hydrodynamic control of the contaminated zone during operation d. Estimate of the rate and direction of groundwater contamination migration 	<p>Part III: Sections 4.2, 4.3, 5.1.2, 5.2.2, 5.3.2, Exhibits 4.2 - 4.7, 5.2, 5.12</p> <p>Part IV: Section 4, Exhibits 4.1 - 4.7, 4.9, 4.10 Appendix E</p>
VII.B.2.a	A narrative summary of the evaluations made in accordance with Sections V, VI, and VII for the preceding 6-month period. These periods shall be 1 January through 30 June and 1 July through 31 December.	<p>Part II: Executive Summary</p> <p>Part III: Executive Summary</p> <p>Part IV: Executive Summary</p>
VII.B.2.b	The chemical analyses results, submitted in a tabulated format in a form acceptable to the Executive Director that clearly indicates each parameter that exceeds the Groundwater Protection Standard. The report shall also contain a summary of quality assurance/quality control results to assure the validity of the analytical data. Copies of the original laboratory report for chemical analyses showing detection limits and quality control and quality assurance data shall be provided if requested by the Executive Director.	<p>Part II: Exhibits 5.1, 5.6 Appendix B, C, E, F</p> <p>Part III: Exhibits 5.1, 5.10, 5.11, Appendix C, F, G</p> <p>Part IV: Appendix D, F, K Exhibit 5.1</p>
VII.B.2.c	Tabulation of all water level elevations required in Section VI.C.4.a, depth to water measurements, and total depth of well measurements collected since the data that was submitted in the previous semiannual report.	Part IV: Appendix A
VII.B.2.d	Potentiometric surface maps showing the elevation of the water table at the time of sampling, delineation of the radius of influence of the corrective action system, and the direction of groundwater flow gradients outside any radius of influence. If a recovery system is used as the corrective action system, the minimum and maximum gradient within the hydrologically influenced area should be specified.	<p>Part III: Exhibits 4.1 - 4.7</p> <p>Part IV: Exhibits 4.1 - 4.7, 4.9 Appendix E</p>

EXHIBIT 1.1 (CONTINUED)Compliance Plan Checklist of Semiannual and Annual Reporting Requirements
Former Kelly AFB, Texas

Compliance Plan Paragraph No.	Requirement	Location in January 2004 Semiannual Compliance Plan Report (July - December 2003)
VII.B.2.e	A notation of the presence or absence of nonaqueous phase liquids, both light and dense phases, in each well during each sampling event since the last event covered in the previous semiannual report and tabulation of depth and thickness of nonaqueous phase liquids, if detected.	Part III: Exhibit 3.2 Part IV: Exhibit 3.3
VII.B.2.f	If applicable, quarterly tabulations of quantities of recovered groundwater and nonaqueous phase liquids, and graphs of monthly recorded flow rates versus time for the recovery wells during each semiannual period.	Part IV: Appendix N
VII.B.2.g	Tabulation of all data evaluation results pursuant to Section VI.D and status of each well with regard to compliance with the corrective action objectives and compliance with the Groundwater Protection Standards.	Part III: Exhibit 5.1, 5.10, 5.11 Section 6.3, Appendix C, Appendix G Part IV: Section 7.3, Appendix F Appendix K Exhibit 5.1
VII.B.2.h	Maps of the contaminated area depicting concentrations of each indicator parameter of each Zone listed in Table II as isopleth contours.	Part III: Appendix D Part IV: Appendix O
VII.B.2.i	Maps indicating the extent and thickness of the light nonaqueous phase liquids and dense nonaqueous phase liquids, if detected.	Part III: Exhibit 3.3 Part IV: Exhibit 3.4
VII.B.2.j	An updated table and map(s) of all monitoring and corrective action system wells and a table of all wells sampled during the semiannual or annual period covered by the report. The wells to be sampled shall be those wells proposed in Tables IV.1 and V.1 of the Groundwater Compliance Plan submittal of 23 July 1996. Wells that have been added or deleted from the groundwater monitoring and remediation systems since the previous semiannual report must be identified.	Part III: Exhibits 2.4, 2.5, 2.8, 2.9, 2.10, 3.1 Part IV: Exhibits 3.1, 3.6, 5.8, 5.11, 5.13, 5.15, 5.17, 5.19, 5.21, 5.23, 5.25, 5.28, 5.31, Appendix J
VII.B.2.k	An updated schedule summary as required by Section IX.	Part I: Introduction, Appendix F
VII.B.2.l	Summary of any changes made to the monitoring/corrective action program and a summary of well inspections, repairs, and any operational difficulties.	Part III: Executive Summary Part IV: Section 6.0, Appendix L , Appendix M

EXHIBIT 1.1 (CONTINUED)Compliance Plan Checklist of Semiannual and Annual Reporting Requirements
Former Kelly AFB, Texas

Compliance Plan Paragraph No.	Requirement	Location in January 2004 Semiannual Compliance Plan Report (July - December 2004)
VII.B.2.m	A table of all modifications and amendments made to this Compliance Plan with their corresponding approval dates by the Executive Director or the Commission and a brief description of each action.	Part I: Exhibit 1.2
VII.B.2.n	Recommendation for any changes.	None
VII.B.2.o	A summary of any activity within the area subject to institutional control.	None
VII.B.2.p	Any other items requested by the Executive Director.	The Executive Director requested no items
VII.D	The permittee shall submit well casing elevations in accordance with Attachment B No. 16 (frequency of resurveying shall not exceed 5 years).	No well surveying was conducted between July-December 2003

EXHIBIT 1.2Compliance Plan Modifications
Former Kelly AFB, Texas

Modification	Description	Date Submitted to TCEQ	Date Approved by TCEQ	Action Taken
Class 3	Submittal of Site S-8 Corrective Measures Implementation Work Plan	4 December 1998	TBD	Final Draft Compliance Plan issued by TCEQ on 4 December 2002. Awaiting letter from Chief Clerk's office regarding next step in process.
Class 1	Permit-Change in Facility's Legal Description	1 February 2002	19 March 2002	Transfer of ownership approved. Notice sent to adjacent landowners 28 May 2002.
Class 3	Submittal of S-4 Groundwater Corrective Measures Implementation Work Plan	8 April 2002	TBD	Application declared administratively complete 18 June 2002. Notice of Receipt of Application and Intent to Obtain Class 3 Modification published 9 and 16 July 2002. Public meeting held 16 July 2002. Awaiting Final Draft Compliance Plan from TCEQ.

EXHIBIT 1.2 (CONTINUED)
Compliance Plan Modifications
Former Kelly AFB, Texas

Modification	Description	Date Submitted to TCEQ	Date Approved by TCEQ	Action Taken
Class 11	Compliance Plan-Change in Facility's Legal Description to remove 145 Duncan and Calgary Units.	3 September 2002	November 8, 2002	Modification approved. Notice to be sent to adjacent landowners January 2003.

Legend:

TBD - To be determined; to date TCEQ has not approved this modification.

Additionally, 14 waste management areas (WMAs) have been designated at the former Kelly AFB. **Exhibit 1.4** presents a summary of sites associated with the Former Kelly AFB that are being addressed by the Air Force. The exhibit does contain sites in addition to those found in the Compliance Plan. The table presents the sites sorted by zone, and their associated WMA number, if applicable, corresponding Work Information Management System (WIMS) site numbers, if applicable, and IRP site aliases, if applicable, for cross-reference. Exhibit 1.4 additionally provides a brief description of each site and constituents of concern (COCs) identified for each site.

Several investigations and remedial activities have been completed at the former Kelly AFB. Between 1982 and 1988, IRP activities primarily comprised preliminary assessments (PAs) and site investigations (SIs). Since 1988, IRP activities primarily have involved remedial investigations and feasibility studies (RI/FSs) that characterize the nature and extent of constituents in soil and groundwater at the IRP sites, evaluate risk to human health and the environment, and evaluate remedial alternatives. In 1989, the Texas Water Commission (TWC), which is now the TCEQ, issued an order that provided a schedule for restoration activities. On 12 June 1998, the TNRCC (now TCEQ) issued to the former Kelly AFB a Hazardous Waste Permit and Compliance Plan that superceded the order. RI/FSs have been completed for Zones 1, 2, and 3 (Halliburton NUS Environmental Corporation, 1992a, 1992b, and 1993) in 1992 and 1993. RFIs were completed for Site E-1, Site E-3, the building 522 SWMU, and the building 258 (Site MP) SWMU. The Final Zone 3 RFI will be submitted to TCEQ in March 2004. The Draft CMS for Zones 2 and 3 (except sites S-4 and S-8) will be sent to the TCEQ and EPA in March 2004. The Site S-8 CMI Work Plan was approved in January 2002. The Class 3 modification resulted in the Final Draft Compliance Plan issued on December 4, 2002. The Site S-4 CMI WP and Class 3 modification was submitted on April 18, 2002. The Application was declared administratively complete with public notices published on 9 and 16 July 2002. The implementation of the corrective action system was completed in November 2002 with the completion of two off-site groundwater trenches. Additional RCRA Feasibility Investigation / Corrective Measures Study (RFI/CMS) activities continue in all five zones. These studies emphasize human health and the environment and have resulted in several interim remedial actions (IRAs) in all five zones. An RFI/CMS has been completed for Zone 4, Operable Unit 1 (OU-1), which is the on-base soils, and a *Draft Final RI Report* was submitted to the TNRCC (now TCEQ) (CH2M HILL, 1998a). The draft RFI report for Zone 4, OU-2 groundwater was developed in early 2001.

CMS's are in progress for Zone 5 (CH2M HILL, 1998b) and two have been completed for Zone 4. Zone 5 RFI/CMS activities are also in progress. RFI field activities for Zone 5 have been completed, and a *Final RFI Report* (CH2M HILL, 1999) was submitted to the TNRCC (now TCEQ) in January 1999. The Zone 5 CMS was submitted as a Draft Final to the TNRCC (now TCEQ) in February 2000, and was updated and resubmitted in December 2001. The TCEQ gave the Zone 5 CMS approval with request for modifications on 8 August 2003.

As of October 2002, the Air Force Base Conversion Agency (AFBCA) has been merged with the Air Force Real Estate Division and is now called the Air Force Real Property Agency (AFRPA). The new agency is expected to improve the effectiveness of Air Force real estate operations. This and future reports will reference the AFRPA.

1.4 Physical Setting

1.4.1 Geography

The San Antonio area lies within two physiographic provinces: the Edwards Plateau section of the Great Plains Province and the Western Gulf Coastal Plain Province. The Balcones Escarpment forms a boundary between these two provinces. This east-west trending escarpment, which is highly faulted and fractured, serves as an important recharge area for the Edwards Aquifer, one of the state's principal aquifers.

The former Kelly AFB is located in the western part of the Western Gulf Coastal Plain Province in south-central Texas, about 150 miles northwest of the Gulf of Mexico and 190 miles west of Houston. The Western Gulf Coastal Plain Province consists of a gently undulating prairie, generally sloping to the southeast, toward the Gulf of Mexico. The entire former Kelly AFB complex comprises 4,660 acres in Bexar County, approximately 7 miles southwest of downtown San Antonio.

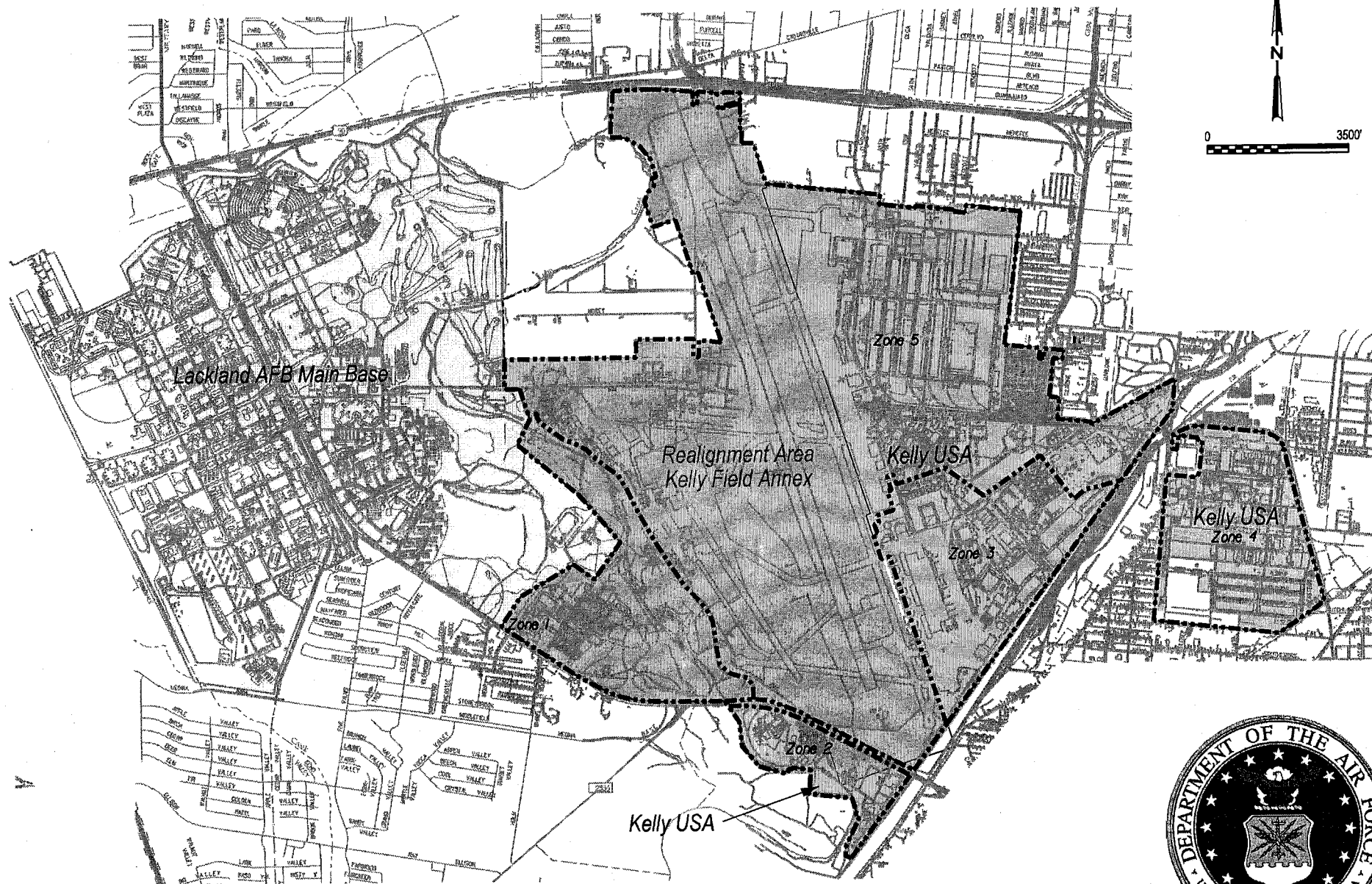


EXHIBIT 1.3
Map of IRP Zones
Former Kelly AFB, Texas

CH2MHILL

EXHIBIT 1.4
Sites
Former Kelly AFB, Texas

Zone	Alias	WIMS Site No.	Waste Management Area	Active Interim Remediation System (Y/N)	SWMU No. ¹	Description	Constituents of Concern	Remediation Status
1	FC-1	FT023	CS-3	N	--/026	Fire-control training area	POLs	Closed
1	D-9	LF001	CS-3	N	--/010	Landfill	Ni, TCE, 1,2 DCE, VC, As	CMS
1	D-1	LF011		N	--/001	Landfill	Cr, organics	CMS
1	D-2	LF012	D-2	Y	--/002-003	Landfill	PCE, TCE, 1,2 DCE, VC, CB, Cr, As	CMS
1	D-3	LF013	D-4/D-5	N	--/004	Landfill	PCE, TCE, 1,2 DCE, As, Mn, Pb, pest, phenols	CMS
1	D-4	LF014	D-4/D-5	Y	--/005	Landfill	PCE, TCE, 1,2 DCE, VC, Sb, pest	CMS
1	D-5	LF015	D-4/D-5	Y	--/006	Landfill	TCE, 1,2 DCE, VC, Cr, Sb, pest, PAHs	CMS
1	D-6	LF016	CS-3	N	--/007	Landfill	PCE, TCE, 1,2 DCE, VC, Cr, pest	CMS
1	D-7	LF017	CS-3	N	--/008	Landfill	PCE, TCE, 1,2 DCE, Cr, pest, PCBs, phenols	CMS
1	D-8	LF018		N	--/009	Landfill	Organics	Closure granted in October 1999.
1		SS035		N		Contaminated groundwater, Zone 1 (SS035)	Listed above by site	CMS
1	B-1	SS041		N	--/028	Lumber burn area	Cresol, PAHs	Closure granted in October 1999.
1	CS-3	SS043	CS-3	N	--/--	Combined site	Ni, organics	CMS
1	E-2	WP020	CS-3	N	--/012	Oil evaporation pit	PAHs	Closure granted in December 1999.
1	SA-1	WP029		N	--/030	Sludge-spreading area	Cr, As, Pb	CMS
2			Northbank	N	--/--	Northbank, Zone 2	Recovery system north of Leon Creek	Included in Zone 2 and 3 CMS.
2	FC-2	FT024		N	034/027	Fire-control training area	TPHs	Report to be submitted December 4, 2003
2	D-10	LF019		N	--/--	Waste tar pit	1,2 DCE, TPHs	Awaiting additional money to complete; ECD Summer 2004
2	IWTP	SS002		Y	--/122-159	Former IWTP	TCE, As	Closure report in progress.
2	S-3	SS005		N	--/015	Maintenance storage area	PCE, TCE, 1,2 DCE	RFI approved by TCEQ. Public notification completed and deed recordation/certification approved by TCEQ.
2	S4-A	SS028		N	005/016 006/055 007/056	Hazardous waste storage area (Lot 600, 620 & 621)	PCE, TCE, 1,2 DCE, VC, CB	Closure report in progress.
2	SA-2	SS030	SA-2	N	001/031	Sludge lagoon	Metals	Closed under RRS2 pending results of ERA.
2	SA-3	SS031		N	--/032	Sludge-spreading area	PCE, 1,2 DCE, VC, benzene, metals	Closure report in progress.
2	SA-4	SS032		N	--/033	Sludge-spreading area	PCE, 1,2 DCE, VC, benzene, metals	Closure report in progress.
2	GW	SS036		N		Contaminated groundwater, Zone 2 (SS036)	Listed above by site	CMS
2	OT-1	SS039	OT-1	N	004/149	Liquid waste incinerator	TCE, As	Closure report in progress.

EXHIBIT 1.4 (CONTINUED)
Compliance Plan Sites
Former Kelly AFB, Texas

Zone	Alias	WIMS Site No.	Waste Management Area	Active Interim Remediation System (Y/N)	SWMU No. ¹	Description	Constituents of Concern	Remediation Status
2	CS-2	SS042	CS-2	Y	—/—	Combined site	1,2 DCE, VC, CB, Cr, PAHs	Included in Zone 2 and 3 CMS.
2	S-9	ST010		N	—/025	Jet engine test cells	Benzene, PAHs	RFI submitted. Awaiting TCEQ response.
2	E-1	WP021	E-1	Y	—/011	Chemical evaporation pit	PCE, TCE, 1,2 DCE, metals	Draft Final RFI submitted.
2	E-3	WP022	E-3/SD-1	Y	003/013	Chemical evaporation pit	PCE, TCE, 1,2 DCE, VC, benzene, As, Pb, pest, PCBs	For soil, closure activities in progress under approved closure plan. Groundwater will be included in Zone 2 & 3 CMS.
2	SD-1	WP033	E-3/SD-1	N	002/034-043	Sludge-drying beds	Metals	Closed IAW RRS2. Closure approved by TCEQ; deed certification completed.
2	SD-2	WP034	E-3/SD-1	N	—/044	Old sludge-drying beds	Metals	Closure report in progress.
3	—		300 Area/S-4	N	—/—	300 Area	PCE, TCE, VC, benzene	RFI Report submitted December 2002. Responses to TCEQ comments will be submitted November 2003.
3	—			N	028/068-073	Building 347 USTs		Closed
3	—			N	029/074-075	Building 348 USTs		Vaulted tank proposed for removal in 2004.
3	—			N	070/—	Building 351 USTs		Closed
3	GW	SS037		N	—/—	Contaminated groundwater, Zone 3 (SS037)	Listed above by site	RFI
3	S-8	SS038	S-8	Y	057/AOC-E	Fuel spill area	PCE, TCE, 1,2 DCE, benzene	CMI WP
3	MP/OT-2	SS040	MP	N	—/—	Former metal plating shops	PCE, TCE, VC, benzene, CB, Ni, Cr, As	Final RFI approved. Site will be included in Zone 2:3 CMS.
3	IWCS	SS044		N	—/246	Zone 3 IWCS	PCE, TCE, 1,2 DCE, CB, Ni	Closure report submitted. AFRPA response to comments in progress.
3	300 Area/S-4	ST006	300 Area/S-4	N	—/AOC-C	Fuel spill area	TCE, VC, benzene	CMI WP in progress.
3	U/386	ST047		N	042/087	UST facility	Benzene, PAHs	Closed
3	U/308	ST048		N	063/—	UST facility	PCE, TCE, 1,2 DCE, benzene, PAHs	Closed
4	—	SS051		N	—/—	IWCS in Zone 4	TCE, 1,2 DCE	RFI
4	GW	SS052		N	—/—	Contaminated groundwater, Zone 4 (SS052)	PCE, TCE, 1,2 DCE, VC	RFI/CMS/CM
5	—			N	—/119	Building 1501 OWS		Closed under RRS2 in March 2002. Released from post-closure care on 25 Sep 2003.
5	—			N	045/092-093	Former Building 966 USTs		Closed (soils) under RRS2 in December 2001.
5	—			N	—/115	Former Building 966 OWS		Closed (soils) under RRS2 in December 2001.
5	—			N	072/111	Building 894 OWS		Closed under RRS2 in December 2001. Released from post-closure care on 2 Aug 2002.
5	—			N	—/—	Former Building 1501 USTs		Released from post-closure care in August 2002. Closed under RRS2 September 2003.

EXHIBIT 1.4 (CONTINUED)
 Compliance Plan Sites
 Former Kelly AFB, Texas

Zone	Alias	WIMS Site No.	Waste Management Area	Active Interim Remediation System (Y/N)	SWMU No. ¹	Description	Constituents of Concern	Remediation Status
5	-			N	--/097-099	S-1592 USTs		Letter submitted to TCEQ to clarify closure approval.
5	-			N	051/060	Building 894 container storage area		Scheduled for closure in 2004.
5	-			N	--/--	Former Building 1418 OWS		TCEQ approved RRS2 closure for soil on 30 June 2003.
5	-	KY028		N	--/--	1100 Area		Closure granted in July 1998.
5	-	KY029		N	--/--	1500 Area		RRS1 closure. Release from post-closure care on 1 July 2003.
5	S-1	SS003	S-1	Y	--/014	Storage Area	PCE, TCE, 1,2 DCE, CB, PAHs	CMS
5	S-10	SS045		N	--/--	Spill area	Organics	CMS for groundwater. Soils closed under RRS2.
5	GW	SS050	OT-50	N	--/--	Spill area/contaminated groundwater Zone 5 (SS050)	Benzene, PAHs, Cr, Ni, TCE, PCE, 1,2 DCE, CB	CMS
5	S-5	ST007		N	--/017-024	Aqua-fuels system	TPHs, PAHs	Closed under 30 TAC 334.
5	-	ST049		N	--/--	Building 38 USTs (Civil Engineer Motor Pool Station)		Scheduled for closure under the TCEQ PST Division, last quarter 2004..

1: AAA/BBB AAA=NOR Unit Number, BBB=EPA RFA Unit Number

Source: Compliance Plan No. CP-50310 (Section I.C.1 through I.C.5).

Note: Constituent of potential concern list originates from historical studies and sampling conducted at each of the sites.

*A remedial system is associated with this site.

-	not applicable	IWCS	Industrial Wastewater Collection System	PCBs	polychlorinated biphenyls	TCE	trichloroethene
As	arsenic	Mn	manganese	PCE	tetrachloroethene	TPH	total petroleum hydrocarbons
CB	chlorobenzene	Ni	nickel	Pest	pesticides	UST	underground storage tank
Cr	chromium	NOR	Notice of Release	RAD	radiological	VC	vinyl chloride
1,2-DCE	dichloroethene	OWS	oil/water separator	RFA	RCRA Facility Assessment	WIMS	Work Information
IRP	Installation Restoration Program	PAHs	polynuclear aromatic hydrocarbons	Sb	antimony	WMA	Waste Management Area
IWTP	Industrial Wastewater Treatment Plant	Pb	lead	SWMU	Solid Waste Management Unit	WP	Work Plan

1.4.2 Topography

The topography of the former Kelly AFB is generally flat. Elevations at the former Kelly AFB range from 610 to 730 feet above the National Geodetic Vertical Datum (NGVD). The highest elevations are on the western side of the base, where there is a prominent escarpment. The lowest elevations are along Leon Creek on the base's southern boundary. Exhibit 1.7 is an aerial photograph of the base and the surrounding area.

1.5 Hydrogeologic Setting

1.5.1 Regional Hydrogeology

The San Antonio area is one of the most developed areas of groundwater use in the state. The freshwater zone of the Edwards Aquifer is the sole source of drinking water for more than one million people in the greater San Antonio area. The Edwards Aquifer Recharge Zone extends 180 miles across parts of 8 counties and varies in width from 5 to 40 miles. The regional subsurface dip of the aquifer is about 100 feet per mile to the south and southeast.

The Edwards outcrop area, known as the Balcones Fault Zone, is an area of extensive faulting. As a result, recharge to the aquifer in the San Antonio region is primarily by infiltration through fractured and porous limestone exposed in stream channels across the outcrop area. Except for the Guadalupe River, all streams that traverse the outcrop lose most or all of their base flow and much of their storm runoff to the aquifer. It is estimated that less than 5 percent of the recharge occurs by direct infiltration of precipitation on the outcrop. The nearest Edwards recharge area to the former Kelly AFB is located about 15 to 20 miles northwest of the base.

Water generally moves south and southeast toward the confined part of the aquifer. Once the water reaches the confined or artesian zone of the aquifer, it moves east and northeast where it discharges through wells and springs. Groundwater flow patterns in the aquifer primarily are controlled by the continuity of permeable strata and by faults.

In Bexar County, the Edwards Aquifer occurs within the Lower Cretaceous carbonate rocks of the Georgetown Limestone and the underlying Edwards Group. The upper-confining unit is composed of extremely low-permeability clays and marls of the Del Rio Clay. The lower-confining unit is a dense carbonate known as the Glen Rose Formation. The heterogeneous aquifer is composed of hard, porous, and fossiliferous limestones and dolomites, ranging in thickness from 450 to 600 feet. The top of Edwards Aquifer is approximately 1,500 feet below land surface (BLS) near the former Kelly AFB.

1.5.2 Base Hydrogeology

Shallow groundwater at the former Kelly AFB occurs in alluvial sediments that overlie Cretaceous-age clays of the Navarro Group (Exhibit 1.5). In these alluvial sediments, the groundwater is encountered at depths of 3 to 37 feet bls across the former Kelly AFB. The top of the Navarro Group forms the lower boundary of the shallow aquifer that exists under unconfined water table conditions in most areas. Localized areas of confined conditions have been encountered in some areas of the former Kelly AFB because of the complex distribution of unconsolidated stratigraphic units. The irregular topography of the Navarro Group surface greatly affects groundwater flow in the surficial aquifer.

EXHIBIT 1.5
Stratigraphy in the Vicinity of Kelly AFB
Former Kelly AFB, Texas

System	Series	Formation		Description	Depth (bls)
Tertiary	Recent	Alluvium (20')		Clay: Yellow with gravel.	
	Paleocene	Midway Group (0-100')		Shaley Clay: Sandy, silty, jointed and oxidized to 75 ft; secondary gypsum associated with jointing; bentonitic, high plasticity; gray weathers tan.	100'
			Clay: With glauconitic sand and silts. Bentonite: 2 ft thick.		
Cretaceous	Gulf	Navarro Group (450')		Shaley Clay: Sandy and silty with limestone concretions throughout; gray weathers tan.	200'
					300'
				The Gas Ridge Oil Field, which was discovered in 1912 and is located just south of Lackland AFB, produces oil from thin sand lenses in the lower 300 ft of the Navarro Group.	400'
					500'
					600'
				Marl and Calcareous Shale: Fossiliferous, blueish-gray.	700'
					800'
					900'
				Argillaceous Limestone and Marl: Fossiliferous, gray.	1,000'
				Natural gas was produced from the Anacacho Limestone in the Gas Ridge Field south of Lackland AFB.	1,100'
		1,200'			
		1,300'			
		1,400'			
		1,500'			
	Comanche	Buda Limestone (61')		Limestone: Fine-grained, dense, hard, gray.	1,400'
		Grayson Shale (Del Rio Clay) (65')		Clay: Soft, fossiliferous, pyrite and gypsum throughout.	
		Edwards and Associated Limestone		Georgetown Member Limestone: Hard, massive.	1,500'

Source: McIntosh & Behm (1967)
Engineering Science, Inc. (1982)
NUS Corp. (January 1990)

bls below land surface



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SAN/CAD/23COM/FREEHAND/PART1/

The Navarro Group, about 450 feet thick, is encountered at depths ranging from the surface to 50 feet bls across the base. The Navarro Group is underlain by more than 300 feet of the Taylor Marl, which in turn is underlain by a series of limestones and shales about 500 feet thick. The limestone and shale sequence, in descending order, comprise Anacacho Limestone, Austin Chalk, Eagle Ford Shale, Buda Limestone, and Del Rio Clay. This sequence overlies limestones of the Edwards Aquifer, which is tightly confined and under artesian pressure beneath the former Kelly AFB.

A previous investigation subdivided the alluvial stratigraphy into eight characteristic lithofacies that in some areas have been covered by fill or disturbed materials (NUS Corporation, 1990). The alluvial lithofacies interfinger both laterally and vertically and consist of a fining-upward sequence of gravel, clayey gravel, sand, silt, and clay (in ascending order). Individual clay units have been distinguished primarily based on plasticity. The clayey gravel and gravel lithofacies typically make up the lower part of the alluvium and are the most common water-bearing units. The sand and silt lithofacies are not as laterally extensive as the overlying clay and underlying gravel deposits.

The thickness of the saturated portion of the alluvium varies and is as much as 20 feet thick in some areas across the base; however, it typically is less than 10 feet in most areas. Groundwater flow generally reflects the slope of the upper Navarro Group surface. Two alluvial groundwater basins are present at the former Kelly AFB with a groundwater flow divide located east of and approximately parallel to the runways. Groundwater flow west of the divide is towards Leon Creek, whereas flow east of the divide is towards the San Antonio River. Hydraulic gradients across the base vary from 0.001 to 0.200 feet per foot (ft/ft); these gradients are generally higher in the southern and western sections and lower in the northern and eastern areas of the base. The distribution of hydraulic conductivity values across the base falls within the range of 10^{-5} to 10^{-1} centimeters per second (cm/sec), indicating highly to moderately permeable material (NUS Corporation, 1990).

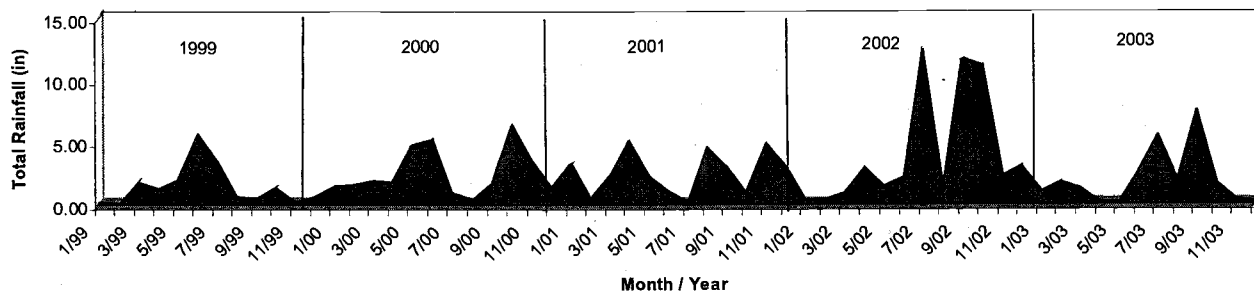
1.6 Climate

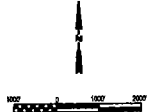
San Antonio has a continental to subtropical climate, with dry mild winters and wet, humid summers. The average annual temperature is 69 degrees Fahrenheit ($^{\circ}$ F) and ranges from a January mean temperature of 52° F to a July and August mean of 84° F.

Exhibit 1.6 shows monthly rainfall totals from January 1999 through October 2003. The average annual rainfall is 28.7 inches, most of which occurs from April to October. May and September are typically the wettest months of the year.

Average annual evaporation from shallow lakes, as reported by the U.S. National Weather Service, is 58 inches. Winds are generally from the north from October through February and from the southeast from March through September. The average maximum wind speed during the reporting period was 33 knots.

EXHIBIT 1.6
Monthly Rainfall Totals at the former Kelly AFB
Former Kelly AFB, Texas





LEGEND

STREAM	---
INTERMITTENT STREAM	---
MAJOR ROAD	---
ZONE BOUNDARY	---



EXHIBIT 1.7
Aerial Photograph of the
Former Kelly AFB and Surrounding Area
Former Kelly AFB, Texas

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SECTION 2.0

Summary of Findings and Conclusions

The following sections are summaries of findings for the individual sampling events conducted during the period for this report. The events include Leon Creek, the RCRA-Regulated Units, and the SWMU Assessment.

2.1 Summary of Findings for Leon Creek Semiannual Assessment

Leon Creek is an extensive urban stream approximately 45 miles long that drains more than 200 square miles of land in western Bexar County. Upstream of the former Kelly Air Force Base (AFB), the creek passes near natural forests, residential communities, a golf course, industrial areas, and agricultural areas. Historically, the 3.5-mile-long segment of Leon Creek adjacent to the former Kelly AFB has little water flow (less than 10 cubic feet per second [cfs]) during any given year, but during storm events has had streamflows exceeding 10,000 cfs. Groundwater in this area contributes to some of the streamflow, as demonstrated by recent measurements; however, nearly continuous flow conditions persist in the lower on-site portion of the stream.

A number of surface water and sediment contaminants have been identified in Leon Creek. At in-stream stations during the current assessment, 8 organic and 16 inorganic parameters were detected in surface water, whereas 40 organic and 22 inorganic parameters were detected in sediment. At seeps and outfalls during the current assessment, 8 organic and 17 inorganic parameters were detected in surface water, whereas 19 organic and 21 inorganic parameters were detected in sediment. Some of the surface water contaminants are potentially related to nearby groundwater plumes; however, other creek contaminants are directly related to upstream conditions, onsite stormwater, and wastewater outfalls. At in-stream stations during the current assessment, 2 surface water and 19 sediment contaminants exceeded the applicable Texas Water Quality Standards (TWQS) surface water/sediment quality guidelines. At seeps and outfalls during the current assessment, three surface water and eight sediment contaminants exceeded the applicable TWQS surface water/sediment quality guidelines.

The results of laboratory toxicity tests of Leon Creek surface water and sediment indicated that potential toxicity occurred at four stations for the fathead minnow, two stations for the green algae, and five stations for the amphipod. Surface water toxicity tests demonstrated no adverse effects to the water flea. On-site monitoring of benthic macroinvertebrate and fish populations indicated some degree of biological impairment at 10 of the 11 monitoring stations (potentially a result of water quality effects and poor aquatic habitat). Three of the 11 monitoring stations (KY030LC060 in Salado Creek, KY030LC070 in Medio Creek, and KY030LC071 in the Medina River) are located outside the Leon Creek watershed, but within the San Antonio River watershed. These sites are not influenced by activities associated with Lackland AFB or the former Kelly AFB; as such, they are considered reference locations and were added to the monitoring program for comparison purposes. Of the 11 monitoring

stations, only KY030LC070 in Medio Creek is currently meeting its aquatic life use designation (Intermediate Aquatic Life).

Overall, the structure of the biological communities of Leon Creek is impaired. Some of this impairment can be attributed to habitat characteristics; however, many of the biological indices show that water quality may contribute to this effect. Water quality in this portion of Leon Creek may be affected by the surrounding land use, extreme water flow conditions, and elevated levels of some surface water and sediment contaminants. Chronic toxicity was identified at various monitoring stations in three of the four surface water and sediment test species, and several contaminants were detected in the Leon Creek fish tissue samples.

2.2 Summary of Findings for Second Semiannual Groundwater Assessment for RCRA-Regulated Units

The semiannual monitoring of four RCRA-regulated sites fulfills the requirements of the TCEQ Compliance Plan No. CP-50310 (Compliance Plan) that was issued on 12 June 1998 along with the Closure/Post-Closure Care Permit by the Texas Commission on Environmental Quality (TCEQ). Part III of the *Semiannual Compliance Plan Report* for the July to December 2003 period summarizes the field and laboratory results for the July 2003 sampling event of the four RCRA-regulated units. The report also evaluates whether ongoing groundwater corrective action programs (CAPs) at the four RCRA-regulated units have attained the Groundwater Protection Standards (GWPS).

The Compliance Plan listed 48 monitoring wells to be sampled semiannually as part of the RCRA monitoring program. This list of monitoring wells was modified, with TCEQ approval, to 42 monitoring wells. Upon issuance of the Class 3 modification for Site S-8 (1 May 2003) the total number of wells for the monitoring of the four RCRA units was 44. Well SS038RW018 was misidentified in the Class 3 modification for Site S-8 as a corrective action observation well when in actuality it is a corrective action system well. Therefore this well is not included in the semiannual sampling events for site S-8. Only 40 wells could be sampled during this event due to insufficient water in wells and site accessibility.

2.2.1 Site E-3

Quarterly and semiannual monitoring results suggest that installing and operating the groundwater recovery system surrounding Site E-3, as well as high rates of degradation, has greatly reduced volatile organic compound (VOC) concentrations in the shallow groundwater. In addition, the plume morphologies for chlorobenzene and arsenic indicate that the current monitoring network adequately evaluates the extent of these constituents.

2.2.2 Site SD-1

Investigations at Site SD-1 indicate that removal actions at this site effectively removed source contamination, thereby achieving Risk Reduction Standard (RRS2) for all site constituents of concern (COCs). The TCEQ has eliminated site SD-1 from further ecological risk assessment (ERA) and concurred with the final closure of SD-1 on a letter dated 14 January 2003. TCEQ released the facility from post-closure care responsibilities for Site SD-1 on 7 July 2003.

2.2.3 Site SA-2

Low levels of COCs found adjacent to Site SA-2 indicate removal actions at this site effectively removed the primary source of contamination. Groundwater monitoring at Site SA-2 indicates the site has minimally affected the shallow aquifer. RRS 2 has been attained for all site COCs and the site was partially backfilled in early 2003 to eliminate exposure to ecological receptors. A request for closure was submitted based on the SA-2 implemented proposed action, but TCEQ did not approve the removal of Site SA-2 from further risk assessment and required that the site be included in the Tier 2 SLERA.

2.2.4 Site S-8

The results of the groundwater monitoring indicate that Site S-8 has contributed both inorganic compounds and organic hazardous constituents to the shallow aquifer. The current monitoring well network sufficiently evaluates the extent of the constituents. This site is not yet in compliance with the GWPSs in the Compliance Plan.

2.2.5 Recommendations

An assessment of the July 2003 semiannual RCRA monitoring network focusing on groundwater elevations, flow directions, contaminant concentrations, and migration rates confirmed that the current monitoring well network (even though additions may be made to the network in the future) adequately evaluates the nature, rate, and extent of contaminant plumes associated with the four RCRA-regulated sites.

Site SD-1 meets RRS 2 and does not impact the groundwater. Site SA-2 has minimally affected the shallow aquifer, and has been approved for closure pending the results of the Ecological Risk Assessment. Based on the closure reports and the groundwater monitoring, it is recommended that the monitoring of these sites cease, upon approval of the final site closures based on results of the ERA. Final closure of Site SD-1 was issued by TCEQ in a letter dated 14 January 2003. Site SA-2 has been included in the Tier 2 SLERA.

2.3 Summary of Findings for Annual SWMU Assessment and Statistical Evaluation

In general, data from the 2003 *Annual Basewide Sampling Event* indicate that most of the plumes associated with known source areas are being addressed by interim recovery systems, which are preventing additional offsite migration. This sampling event is in accordance with the Compliance Plan requirements. The wells that have historically had the highest concentrations of constituents have generally shown a decrease in constituent levels over time. Overall, the plumes have generally remained the same in extent since 1995. The offbase lateral extent of the PCE, TCE, and total 1, 2-DCE plumes have been fully defined east and southeast of Zones 3 and 4, as new offbase wells have been installed.

From 1999 to 2003, detection frequency and VOC extent has varied only slightly. VOC concentrations, however, have shown steady reduction, particularly in the vicinity of source and downgradient areas that correspond to recovery systems along Leon Creek in Zone 2: where lower concentrations have been detected between the creek and operating recovery systems. A marked decrease in concentrations continues downgradient of Site SS040 (MP)

and is attributed to the recent installation of a slurry wall and on-site recovery system upgrades. Additional decreases in concentrations and extent are beginning to be seen immediately downgradient of the horizontal extraction systems in operation at the former East Kelly AFB. Dramatic reductions in chlorinated hydrocarbon concentrations have also been achieved in the WP022 (E-3) source area.

Hydrogen releasing compounds were injected into the Zone 5 groundwater between July and December 2002. There were a total of 319 injection points at the 1400 Area, 56 in the 1600 Area, and 212 in the 1600 Area East (i.e., North of B1650). Work in the 1600 Area occurred in late July and August of 2002. The 1600 area had the best results possibly associated with the longer treatment duration. Evaluation is ongoing to determine if additional injection is required and if the enhanced Bio is still working. Samples were collected in early December 2003.

Statistically derived representative concentrations for groundwater data collected at the former Kelly AFB were evaluated to determine whether the corrective action programs have achieved GWPS.

The waste management area (WMA) statistical evaluation provided the following conclusions:

- Overall, concentrations exceeded criteria for COCs typically associated with individual WMAs. These COCs include PCE, TCE, total 1,2-DCE, vinyl chloride, chlorobenzene, benzene, arsenic, nickel, and chromium.
- Semivolatile organic compounds (SVOCs) were identified as exceeding criteria, but in most instances, only one or two detects occurred. The most frequently detected SVOC, bis(2-ethylhexyl)phthalate, is a common field sampling/laboratory contaminant.
- Manganese was found to exceed criteria in various WMA compliance wells by one to two orders of magnitude.

2.4 Future Compliance Plan Requirements

As required by the Compliance Plan, there will be two semiannual reporting events for the calendar year 2004 (January through June, and July through December) (see Appendix F for a detailed schedule). The first semiannual report, due to TCEQ 21 July 2004, included the results from the activities occurring between January and June 2004, with the exception of the annual basewide sampling of the SWMUs, which will be reported in the second semiannual report, which is due to TCEQ on 21 January 2005. Since the annual basewide sampling of the SWMUs is conducted between April and June of each year, the data results and quality control of data will not be completed until August; therefore, the results are unavailable for the first semiannual report.

The first semiannual report will include the January 2004 Leon Creek semiannual surface water and sediment sampling, March 2004 basewide water level measurements, and January 2004 semiannual RCRA groundwater sampling.

The second semiannual report, covering events that occur from July 2004 to December 2004, will include July 2004 Leon Creek semiannual surface water, sediment sampling, bioassay, rapid bioassessment, and fish tissue sampling; September 2004 basewide water level

measurements; July 2004 semiannual RCRA groundwater sampling; and the annual basewide sampling event.

13 July 2004

Dear Members of the RAB,

Mr. Robert Silvas has submitted a request to provide copies of certain documents to all RAB members. However, due to issues of privacy, only one of the documents can be disseminated for your review. Attached is a letter addressed to Mr. Silvas from the Texas Commission on Environmental Quality.

If there are any questions please feel free to call 925-0956.

Thank you.

RAB Executive Committee

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

June 23, 2004

Mr. Robert Silvas

Mr. Silvas:

You have requested, via telephone, information related to the communication between TCEQ and Mr. Greg Cox of the Travis County District Attorney's office. TCEQ has previously provided to you a copy of a letter from TCEQ to Mr. Cox. You have also requested a copy of any correspondence or information received by TCEQ from Mr. Cox or the Travis County District Clerk's office. The TCEQ has not received any correspondence from Mr. Cox since the date of the letter that has been provided to you. Therefore, TCEQ has no documents responsive to the request.

Please direct all further communication regarding this matter to me. You may contact me by mail at the following address: Mr. Paul C. Sarahan, Litigation Division, P.O. Box 13087, MC175, Austin, Texas, 78711-3087.

Sincerely,

A handwritten signature in black ink, appearing to read "P.C. Sarahan".

Paul C. Sarahan, Director
Litigation Division

PCS/ef

The meeting location

1. Why did the meeting location change?

- Due to schedule conflicts at Kennedy Auditorium, the meeting was moved to GKDA.
- We worked with Edgewood ISD to find another school in the area that we could use for the meeting, but nothing was available.
- We have held other RAB related events at GKDA so members are familiar with the location.

2. How was the public notified?

- We advertised in the *San Antonio Express News* and in the *Primetime* papers regarding the meeting date, location, and time for the public to be aware.
- We sent out a Public Service Announcement.
- We sent the RAB members their materials packets with a notice and directions to the new location.
- We sent the RAB members e-mails regarding the location change.
- We had a person at Kennedy who posted signs and handed out maps and directions to the location.

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE