

1		
T		
2		
3		
4	-	
5		TRANSCRIPTION OF AUDIO RECORDING
6		RAB TECHNICAL SUBCOMMITTEE MEETING
7		MAY 13 1007
8		MAT 15, 1997
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		ORIGINAL
1,0		EEDEDAL COUDE DEDODEROS OF SAN ANEONTO INC
	101	PEDERAL COURT REPORTERS OF SAN ANTONIO, INC. OO REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

KELLY AR # 3401.1 Page 3 of 121 2

1	UNIDENTIFIED MALE: Will anybody be able
2	to get a copy of this meeting?
3	UNIDENTIFIED MALE: You bet.
4	UNIDENTIFIED MALE: Thank you. Are you
5	going to have it transcribed?
6	UNIDENTIFIED MALE: Yes.
7	UNIDENTIFIED MALE: All right, today we
8	have three topics. I'm going to be talking about soil
9	sampling at North Kelly Gardens and then there's going
10	to be discussion about air monitoring at North Kelly
11	Gardens, Zone 5.
12	Who will be doing that talking, Howard,
13	and air monitoring?
14	UNIDENTIFIED MALE: Joe (Inaudible)
15	research.
16	UNIDENTIFIED MALE: Joe, okay. And the
17	other topic is going to be clean-up plans for Zone 3
18	ground water, and the SAIC folks are going to be doing
19	that.
20	I don't know if you guys have worked out
21	a particular order but I don't know that it matters, so
22	whichever one of you prefer to go first.
23	UNIDENTIFIED MALE: Air monitoring.
24	UNIDENTIFIED MALE: Great, that's fine.
25	UNIDENTIFIED MALE: Does everyone know

1 everyone here? Would you like to go around the room 2 real quick? 3 UNIDENTIFIED MALE: That's a good idea. 4 UNIDENTIFIED MALE: I'm Mike 5 (Inaudible). I work for Mr. Bailey. I'm a Deputy 6 Environmental Manager. 7 UNIDENTIFIED MALE: I'm Vince 8 (Inaudible). (Inaudible) and Program Manager for 9 (Inaudible). 10 UNIDENTIFIED MALE: I'm Chuck 11 (Inaudible). I work for the Air Force Base Convention 12 Units. UNIDENTIFIED MALE: Tom (Inaudible.) 13 14 UNIDENTIFIED MALE: (Inaudible). 15 UNIDENTIFIED MALE: Jerry (Inaudible). 16 Zone 5 (Inaudible). 17 UNIDENTIFIED MALE: (Inaudible), Program 18 Manager for our contract with Kelly. 19 UNIDENTIFIED MALE: (Inaudible). 20 Citizen. 21 UNIDENTIFIED MALE: Tom (Inaudible) with 22 CH2M Hill. 23 MR. SAXON: I'm Howard Saxon, the Senior 24 Project Manager with CH2M Hill and managing the air 25 study (Inaudible).

KELLY AR # 3401.1 Page 5 of 121 4

1	MR. STEED: David Steed with CH2M Hill.
2	Lead on the soil sampling of 1592.
3	UNIDENTIFIED MALE: John Brewer,
4	Southwest Research, and we've been contracted to do the
5	air survey at North Kelly Gardens.
6	UNIDENTIFIED FEMALE: (Inaudible), with
7	the Environmental Protection Agency (Inaudible).
8	MR. JOHNSON: I'm David Johnson and I'm
9	the representative for (Inaudible), representative for
10	North Kelly Gardens.
11	UNIDENTIFIED MALE: I'm Jean
12	(Inaudible). I'm (Inaudible).
13	MR. HOFFMAN: Gary Hoffman, citizen, I
14	guess. (Inaudible).
15	UNIDENTIFIED MALE: I'm Mike (Inaudible.)
16	I'm Director of Environmental Engineering at Southwest
17	Research.
18	MR. RICE: George Rice. I'm a member of
19	the RAB and I'm also the chairman of the technical
20	committee of the RAB, which this is a meeting.
21	I hope that we can keep things pretty
22	informal today and ask I hope, well at least while
23	I'm up here, I hope people ask questions if they occur
24	to them, as they occur to them.
25	I'll be pretty brief. Most of you know

KELLY AR # 3401.1 Page 6 of 121 5

1	the history of the soil sampling in the North Kelly
2	Gardens area so I'm not going to repeat that.
3	Then you also probably know that there's
4	been some question as to whether some of the samplings
5	have been reflected in fill or in native soils.
6	Now the issue, I'm not going it address
7	today, although people can bring it up if they want but
8	I didn't plan on addressing it, was health issues and
9	what is the significance of the led concentrations that
10	are found in the soils and that sort of thing.
11	All I had intended to address today was
12	this question of whether or not we're dealing with
13	native soils or fills, and if you all remember my
14	presentation at the last RAB meeting, in my opinion
15	anyway, that has significant implications for hiding and
16	interpreting data and, in fact, whether or not you can
17	interpret the data in any meaningful way.
18	So a couple of months ago, the Air Force
19	took many samples out in the Let me just point it out
20	on this map here. They took samples both on and off
21	base here.
22	The concerns that are of concern here are
23 <sup>°</sup>	the ones that we're taking between the fence line and
24	the North Kelly Garden neighborhood just north of Berman
25	Road.
1	

Г

KELLY AR # 3401.1 Page 7 of 121 6

1	At the last technical committee meeting,
2	the Air Force presented a nice color map where it showed
3	that all of the samples were new soil. At that point, I
4	raised the question that probably some of them were
5	fill, because we assumed this was, so what we did last
6	Friday was we went out there and we actually dug next to
7	the points where the Air Force had taken some of its
8	samples, and in one place we went down over a foot, and
9	I would just like to show you what we found there and
10	invite you all to look at this stuff at your leisure,
11	and you can make up your own minds as to whether you
12	think this stuff is native soil, that is the stuff that
13	was there when no one had to move it in, or whether it's
14	fill, essentially stuff brought in in dump trucks.
15	First, I'd like to show you a sample of
16	what I call native soil. I think that this is the
17	natural soil that occurs there. Here is a copy of like
18	a soil at last for Bexar County. Earlier I told people
19	that you all are welcome to make a copy of this
20	information if you want. It will be here.
21	UNIDENTIFIED MALE: Do you know what the
22	date of that soil survey is?
23	MR. RICE: This is old. This is from the
24	'60s.
25	UNIDENTIFIED MALE: Yes.
L	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

Γ

10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

KELLY AR # 3401.1 Page 8 of 121 7

1	MR. RICE: This is old. This soil here,
2	and I'm not a soil expert but after reading the
3	description and looking on a map, seeing what the map
4	calls it, I think that the map is right. This is
5	Lewisville silty clay, and when I dug it up, and those
6	of you that saw me dig it up, it has a very nice sort of
7	a firm texture.
8	When you put your shovel in it, it
9	doesn't run like sand or it doesn't stick like clay but
10	it kind of comes out almost like a piece of cake and
11	then you can take your hand and you can grab it and it
12	will crumble in your hand like that.
13	So here's native soil, and I think that
14	most people would agree with me that this is the stuff
15	that was originally there.
16	Now I'll just go down these little plates
17	here in no particular order, although I got (Inaudible)
18	here.
19	This is a sample from 1410, site 1410,
20	and this is what the Air Force calls native soil, and
21	it's not like the Lewisville, absolutely nothing like
22	it, and I don't think it takes a soil scientist to come
23	to the conclusion that this ain't the same stuff as what
24	I just showed you.
25	Well, you know, this is from 1509, from
L	

ſ

KELLY AR # 3401.1 Page 9 of 121 8

1two to six inches, and I believe that this was also2called native soil. I have a question mark here but I3think that you folks also call it native soil.4Once again, I think if you look at this5stuff, it's not nearly the big block that we got from61410, but to me, it's not similar to the Lewisville that7I showed at the beginning as being native soil.8Now last of all, I think there are a9couple of interesting samples from a sample point 1505.10According to the Air Force, at 1505,11there's a foot of fill, and then below the fill, there's12native soil, so at the suggestion of Norm, I dug a13sample from two to six inches, what the Air Force calls14fill, then Armando and I dug out a fairly large hole,15and from 12 to 16 inches, we took a sample of the16material that the Air Force calls native soil at the17site.18Now if you look at these two samples, I19don't think, at least I can't tell the difference. I20think what you got here, regardless of whether it's fill21or native, these are two bags of the same stuff. I see22no reason to call one fill and the other one native23soil. Now perhaps a soil scientist could make a24distinction between the two but I certainty can't.25So wrapping this up, it's my contention		
called native soil. I have a question mark here but I think that you folks also call it native soil. Once again, I think if you look at this stuff, it's not nearly the big block that we got from 1410, but to me, it's not similar to the Lewisville that I showed at the beginning as being native soil. Now last of all, I think there are a couple of interesting samples from a sample point 1505. According to the Air Force, at 1505, there's a foot of fill, and then below the fill, there's native soil, so at the suggestion of Norm, I dug a sample from two to six inches, what the Air Force calls fill, then Armando and I dug out a fairly large hole, and from 12 to 16 inches, we took a sample of the material that the Air Force calls native soil at the site. Now if you look at these two samples, I don't think, at least I can't tell the difference. I think what you got here, regardless of whether it's fill or native, these are two bags of the same stuff. I see no reason to call one fill and the other one native soil. Now perhaps a soil scientist could make a distinction between the two but I certainty can't. So wrapping this up, it's my contention	1	two to six inches, and I believe that this was also
<ul> <li>think that you folks also call it native soil.</li> <li>Once again, I think if you look at this</li> <li>stuff, it's not nearly the big block that we got from</li> <li>1410, but to me, it's not similar to the Lewisville that</li> <li>I showed at the beginning as being native soil.</li> <li>Now last of all, I think there are a</li> <li>couple of interesting samples from a sample point 1505.</li> <li>According to the Air Force, at 1505,</li> <li>there's a foot of fill, and then below the fill, there's</li> <li>native soil, so at the suggestion of Norm, I dug a</li> <li>sample from two to six inches, what the Air Force calls</li> <li>fill, then Armando and I dug out a fairly large hole,</li> <li>and from 12 to 16 inches, we took a sample of the</li> <li>material that the Air Force calls native soil at the</li> <li>site.</li> <li>Now if you look at these two samples, I</li> <li>don't think, at least I can't tell the difference. I</li> <li>think what you got here, regardless of whether it's fill</li> <li>or native, these are two bags of the same stuff. I see</li> <li>no reason to call one fill and the other one native</li> <li>soil. Now perhaps a soil scientist could make a</li> <li>distinction between the two but I certainty can't.</li> </ul>	2	called native soil. I have a question mark here but I
4Once again, I think if you look at this5stuff, it's not nearly the big block that we got from61410, but to me, it's not similar to the Lewisville that7I showed at the beginning as being native soil.8Now last of all, I think there are a9couple of interesting samples from a sample point 1505.10According to the Air Force, at 1505,11there's a foot of fill, and then below the fill, there's12native soil, so at the suggestion of Norm, I dug a13sample from two to six inches, what the Air Force calls14fill, then Armando and I dug out a fairly large hole,15and from 12 to 16 inches, we took a sample of the16material that the Air Force calls native soil at the17site.18Now if you look at these two samples, I19don't think, at least I can't tell the difference. I20think what you got here, regardless of whether it's fill21or native, these are two bags of the same stuff. I see22no reason to call one fill and the other one native23soil. Now perhaps a soil scientist could make a24distinction between the two but I certainty can't.25So wrapping this up, it's my contention	3	think that you folks also call it native soil.
<ul> <li>stuff, it's not nearly the big block that we got from</li> <li>1410, but to me, it's not similar to the Lewisville that</li> <li>I showed at the beginning as being native soil.</li> <li>Now last of all, I think there are a</li> <li>couple of interesting samples from a sample point 1505.</li> <li>According to the Air Force, at 1505,</li> <li>there's a foot of fill, and then below the fill, there's</li> <li>native soil, so at the suggestion of Norm, I dug a</li> <li>sample from two to six inches, what the Air Force calls</li> <li>fill, then Armando and I dug out a fairly large hole,</li> <li>and from 12 to 16 inches, we took a sample of the</li> <li>material that the Air Force calls native soil at the</li> <li>site.</li> <li>Now if you look at these two samples, I</li> <li>don't think, at least I can't tell the difference. I</li> <li>think what you got here, regardless of whether it's fill</li> <li>or native, these are two bags of the same stuff. I see</li> <li>no reason to call one fill and the other one native</li> <li>soil. Now perhaps a soil scientist could make a</li> <li>distinction between the two but I certainty can't.</li> </ul>	4	Once again, I think if you look at this
<ul> <li>6 1410, but to me, it's not similar to the Lewisville that</li> <li>7 I showed at the beginning as being native soil.</li> <li>8 Now last of all, I think there are a</li> <li>9 couple of interesting samples from a sample point 1505.</li> <li>10 According to the Air Force, at 1505,</li> <li>11 there's a foot of fill, and then below the fill, there's</li> <li>12 native soil, so at the suggestion of Norm, I dug a</li> <li>13 sample from two to six inches, what the Air Force calls</li> <li>14 fill, then Armando and I dug out a fairly large hole,</li> <li>15 and from 12 to 16 inches, we took a sample of the</li> <li>16 material that the Air Force calls native soil at the</li> <li>17 site.</li> <li>18 Now if you look at these two samples, I</li> <li>19 don't think, at least I can't tell the difference. I</li> <li>10 think what you got here, regardless of whether it's fill</li> <li>11 or native, these are two bags of the same stuff. I see</li> <li>12 no reason to call one fill and the other one native</li> <li>23 soil. Now perhaps a soil scientist could make a</li> <li>24 distinction between the two but I certainty can't.</li> <li>25 So wrapping this up, it's my contention</li> </ul>	5	stuff, it's not nearly the big block that we got from
7I showed at the beginning as being native soil.8Now last of all, I think there are a9couple of interesting samples from a sample point 1505.10According to the Air Force, at 1505,11there's a foot of fill, and then below the fill, there's12native soil, so at the suggestion of Norm, I dug a13sample from two to six inches, what the Air Force calls14fill, then Armando and I dug out a fairly large hole,15and from 12 to 16 inches, we took a sample of the16material that the Air Force calls native soil at the17site.18Now if you look at these two samples, I19don't think, at least I can't tell the difference. I20think what you got here, regardless of whether it's fill21or native, these are two bags of the same stuff. I see22no reason to call one fill and the other one native23soil. Now perhaps a soil scientist could make a24distinction between the two but I certainty can't.25So wrapping this up, it's my contention	6	1410, but to me, it's not similar to the Lewisville that
8Now last of all, I think there are a9couple of interesting samples from a sample point 1505.10According to the Air Force, at 1505,11there's a foot of fill, and then below the fill, there's12native soil, so at the suggestion of Norm, I dug a13sample from two to six inches, what the Air Force calls14fill, then Armando and I dug out a fairly large hole,15and from 12 to 16 inches, we took a sample of the16material that the Air Force calls native soil at the17site.18Now if you look at these two samples, I19don't think, at least I can't tell the difference. I20think what you got here, regardless of whether it's fill21or native, these are two bags of the same stuff. I see22no reason to call one fill and the other one native23soil. Now perhaps a soil scientist could make a24distinction between the two but I certainty can't.25So wrapping this up, it's my contention	7	I showed at the beginning as being native soil.
<ul> <li>9 couple of interesting samples from a sample point 1505.</li> <li>10 According to the Air Force, at 1505,</li> <li>11 there's a foot of fill, and then below the fill, there's</li> <li>12 native soil, so at the suggestion of Norm, I dug a</li> <li>13 sample from two to six inches, what the Air Force calls</li> <li>14 fill, then Armando and I dug out a fairly large hole,</li> <li>15 and from 12 to 16 inches, we took a sample of the</li> <li>16 material that the Air Force calls native soil at the</li> <li>17 site.</li> <li>18 Now if you look at these two samples, I</li> <li>19 don't think, at least I can't tell the difference. I</li> <li>10 think what you got here, regardless of whether it's fill</li> <li>11 or native, these are two bags of the same stuff. I see</li> <li>12 no reason to call one fill and the other one native</li> <li>23 soil. Now perhaps a soil scientist could make a</li> <li>24 distinction between the two but I certainty can't.</li> <li>25 So wrapping this up, it's my contention</li> </ul>	8	Now last of all, I think there are a
10According to the Air Force, at 1505,11there's a foot of fill, and then below the fill, there's12native soil, so at the suggestion of Norm, I dug a13sample from two to six inches, what the Air Force calls14fill, then Armando and I dug out a fairly large hole,15and from 12 to 16 inches, we took a sample of the16material that the Air Force calls native soil at the17site.18Now if you look at these two samples, I19don't think, at least I can't tell the difference. I20think what you got here, regardless of whether it's fill21or native, these are two bags of the same stuff. I see22no reason to call one fill and the other one native23soil. Now perhaps a soil scientist could make a24distinction between the two but I certainty can't.25So wrapping this up, it's my contention	9	couple of interesting samples from a sample point 1505.
11 there's a foot of fill, and then below the fill, there's 12 native soil, so at the suggestion of Norm, I dug a 13 sample from two to six inches, what the Air Force calls 14 fill, then Armando and I dug out a fairly large hole, 15 and from 12 to 16 inches, we took a sample of the 16 material that the Air Force calls native soil at the 17 site. 18 Now if you look at these two samples, I 19 don't think, at least I can't tell the difference. I 10 think what you got here, regardless of whether it's fill 21 or native, these are two bags of the same stuff. I see 22 no reason to call one fill and the other one native 23 soil. Now perhaps a soil scientist could make a 24 distinction between the two but I certainty can't. 25 So wrapping this up, it's my contention	10	According to the Air Force, at 1505,
12 native soil, so at the suggestion of Norm, I dug a 13 sample from two to six inches, what the Air Force calls 14 fill, then Armando and I dug out a fairly large hole, 15 and from 12 to 16 inches, we took a sample of the 16 material that the Air Force calls native soil at the 17 site. 18 Now if you look at these two samples, I 19 don't think, at least I can't tell the difference. I 20 think what you got here, regardless of whether it's fill 21 or native, these are two bags of the same stuff. I see 22 no reason to call one fill and the other one native 23 soil. Now perhaps a soil scientist could make a 24 distinction between the two but I certainty can't. 25 So wrapping this up, it's my contention	11	there's a foot of fill, and then below the fill, there's
<ul> <li>13 sample from two to six inches, what the Air Force calls</li> <li>14 fill, then Armando and I dug out a fairly large hole,</li> <li>15 and from 12 to 16 inches, we took a sample of the</li> <li>16 material that the Air Force calls native soil at the</li> <li>17 site.</li> <li>18 Now if you look at these two samples, I</li> <li>19 don't think, at least I can't tell the difference. I</li> <li>20 think what you got here, regardless of whether it's fill</li> <li>21 or native, these are two bags of the same stuff. I see</li> <li>22 no reason to call one fill and the other one native</li> <li>23 soil. Now perhaps a soil scientist could make a</li> <li>24 distinction between the two but I certainty can't.</li> <li>25 So wrapping this up, it's my contention</li> </ul>	12	native soil, so at the suggestion of Norm, I dug a
fill, then Armando and I dug out a fairly large hole, and from 12 to 16 inches, we took a sample of the material that the Air Force calls native soil at the site. Now if you look at these two samples, I don't think, at least I can't tell the difference. I think what you got here, regardless of whether it's fill or native, these are two bags of the same stuff. I see no reason to call one fill and the other one native soil. Now perhaps a soil scientist could make a distinction between the two but I certainty can't. So wrapping this up, it's my contention	13	sample from two to six inches, what the Air Force calls
<ul> <li>and from 12 to 16 inches, we took a sample of the</li> <li>material that the Air Force calls native soil at the</li> <li>site.</li> <li>Now if you look at these two samples, I</li> <li>don't think, at least I can't tell the difference. I</li> <li>think what you got here, regardless of whether it's fill</li> <li>or native, these are two bags of the same stuff. I see</li> <li>no reason to call one fill and the other one native</li> <li>soil. Now perhaps a soil scientist could make a</li> <li>distinction between the two but I certainty can't.</li> <li>So wrapping this up, it's my contention</li> </ul>	14	fill, then Armando and I dug out a fairly large hole,
<ul> <li>material that the Air Force calls native soil at the</li> <li>site.</li> <li>Now if you look at these two samples, I</li> <li>don't think, at least I can't tell the difference. I</li> <li>think what you got here, regardless of whether it's fill</li> <li>or native, these are two bags of the same stuff. I see</li> <li>no reason to call one fill and the other one native</li> <li>soil. Now perhaps a soil scientist could make a</li> <li>distinction between the two but I certainty can't.</li> <li>So wrapping this up, it's my contention</li> </ul>	15	and from 12 to 16 inches, we took a sample of the
17 site. 18 Now if you look at these two samples, I 19 don't think, at least I can't tell the difference. I 20 think what you got here, regardless of whether it's fill 21 or native, these are two bags of the same stuff. I see 22 no reason to call one fill and the other one native 23 soil. Now perhaps a soil scientist could make a 24 distinction between the two but I certainty can't. 25 So wrapping this up, it's my contention	16	material that the Air Force calls native soil at the
18Now if you look at these two samples, I19don't think, at least I can't tell the difference. I20think what you got here, regardless of whether it's fill21or native, these are two bags of the same stuff. I see22no reason to call one fill and the other one native23soil. Now perhaps a soil scientist could make a24distinction between the two but I certainty can't.25So wrapping this up, it's my contention	17	site.
19 don't think, at least I can't tell the difference. I 20 think what you got here, regardless of whether it's fill 21 or native, these are two bags of the same stuff. I see 22 no reason to call one fill and the other one native 23 soil. Now perhaps a soil scientist could make a 24 distinction between the two but I certainty can't. 25 So wrapping this up, it's my contention	18	Now if you look at these two samples, I
20 think what you got here, regardless of whether it's fill 21 or native, these are two bags of the same stuff. I see 22 no reason to call one fill and the other one native 23 soil. Now perhaps a soil scientist could make a 24 distinction between the two but I certainty can't. 25 So wrapping this up, it's my contention	19	don't think, at least I can't tell the difference. I
21 or native, these are two bags of the same stuff. I see 22 no reason to call one fill and the other one native 23 soil. Now perhaps a soil scientist could make a 24 distinction between the two but I certainty can't. 25 So wrapping this up, it's my contention	20	think what you got here, regardless of whether it's fill
22 no reason to call one fill and the other one native 23 soil. Now perhaps a soil scientist could make a 24 distinction between the two but I certainty can't. 25 So wrapping this up, it's my contention	21	or native, these are two bags of the same stuff. I see
23 soil. Now perhaps a soil scientist could make a 24 distinction between the two but I certainty can't. 25 So wrapping this up, it's my contention	22	no reason to call one fill and the other one native
24 distinction between the two but I certainty can't. 25 So wrapping this up, it's my contention	23	soil. Now perhaps a soil scientist could make a
25 So wrapping this up, it's my contention	24	distinction between the two but I certainty can't.
	25	So wrapping this up, it's my contention

Г

KELLY AR # 3401.1 Page 10 of 121 9

1	that in conducting this soil survey, the Air Force made
2	a fundamental mistake, the Air Force and its
3	contractors, and that mistake was that they did not go
4	and identify clearly native soil so that they would know
5	what native soil looked like so that when they were then
6	collecting samples in the area just north of Berman
7	Road, they would have some means for judging between the
8	two things, because I think it's clear that the samples
9	that we have here that the Air Force is calling native
10	soil ain't native soil, at least not if you compare it
11	to what I think most of us could agree is native soil.
12	I'll be happy to answer any questions.
13	Yes, Norm?
14	UNIDENTIFIED MALE: Yes, well, I'm going
15	to present some arguments against what you stated, I
16	guess.
17	MR. RICE: Sure.
18	UNIDENTIFIED MALE: For the sake of
19	MR. RICE: By the way, I think that's a
20	large part of the purpose of this committee is to bat
21	these ideas around, so if you would like to come up
22	here, feel free.
23	UNIDENTIFIED MALE: I can just do it from
24	here, I guess.
25	A couple of things. The alleged release
L	FEDERAL COURT REPORTERS OF SAN ANTONIO INC

of contaminated surface water into the neighborhood, 1 2 when did that occur? David could answer 3 UNIDENTIFIED MALE: 4 that better than I could. 5 UNIDENTIFIED MALE: That happened 6 basically since I lived there. We moved there in about 7 '65. At that point in time, Berman Road was not built up and we did not have the sewer system that's in place 8 The sewer system wasn't put in till the '80s. 9 now. Berman Road, to my knowledge, has been 10 filled up at least twice between the years of '65 to the 11 early '80s or mid '80s, so a lot of that has been 12 graded, removed, (Inaudible) and filled up. But even at 13 14 that, with the basic topography of the general area, 15 when you're standing in the North Kelly Gardens area, 16 you'll see that it does actually flow downhill. 17 Prior to that, right there on the corner 18 of Bank Street and I think that's Dolgreen, all of that and surrounding where the houses are built now, all of 19 20 that used to flood all the way up to Berman Road and it 21 would go down Berman Road to 36th Street, the same 22 thing, everything that would flood, and especially when 23 we received rains of anywhere up to three inches or 24 better, with winds actually does drive it over. 25 UNIDENTIFIED MALE: Do you have any

KELLY AR # 3401.1 Page 12 of 121

1	photographs of that flooding that took place?
2	UNIDENTIFIED MALE: We're looking for
3	that. I mean, it wasn't something that we kept a camera
4	handy to take a shot of the flood, but any time we
5	received substantial amounts of rain, it just depends on
6	the frequency and how quick it would flood there.
7	UNIDENTIFIED MALE: Sure, okay.
8	UNIDENTIFIED MALE: What my point is, in
9	terms of native versus non-native, and I'll just do that
10	as the entire Kelly Gardens is built on fill. That was
11	graded and filled. You could tell, when we ran the
12	drainage way, the independent drainage way in two places
13	here, (Inaudible) soil, and you just look out there,
14	North Kelly Gardens is all elevated. It's honestly been
15	built on some kind of fill. I mean, it sure wasn't
16	built on so-called native soil. So when this explosion
17	took place, I mean, this water was running over fill.
18	UNIDENTIFIED MALE: How far to the
19	background
20	UNIDENTIFIED MALE: Now the sample of
21	native clay was in a drainage-way heavily vegetated and
22	obviously very loamy topsoil and it's just not what is
23	representative of what's in North Kelly Gardens or
24	Berman Road.
25	UNIDENTIFIED MALE: So what is the point?
	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC. 10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216

Г

PHONE: (210) 340-6464 / FAX: (210) 341-5533

KELLY AR # 3401.1 Page 13 of 121 12

1	UNIDENTIFIED MALE: Well, if you recall
2	my invitation to you on Friday, I said, "Let's go into
3	the neighborhood with our shovels, go to the areas where
4	we took our samples and let's dig there." And I think
5	that you will agree with me when we do that, that the
6	samples we get out of there are a whole lot more like
7	what I'm calling native soil here than they are like
8	what you're calling native soil, or what I'm calling
9	fill.
10	UNIDENTIFIED MALE: Okay. Where does
11	this term "Native soil" come from anyway?
12	UNIDENTIFIED MALE: I'll define that.
13	What we did, we sampled a 40 acre area, and out of 40
14	acres, on the logs, the people logged what was the
15	material that was sent in for analysis.
16	Basically over 40 acres, including this
17	area in question, the primary description in the logs
18	was black clay with rock, or it said something to the
19	effect of fill, base material, asphalt, something like
20	that.
21	So what the term became is people logging
22	in the field, identified anything as fill that in their
23	one inch diameter core that they sampled had any kind of
24	asphalt, obvious road base, glass, things like that,
25	were classified as fill because we knew that they

1	weren't, quote, native, but there wasn't any real
2	description in the log of using the term native
3	anywhere. It said black clay with rock.
4	Well, to differentiate and use things as
5	it progressed in the risk assessment, people then turned
6	and said, well, this black clay with rock that covers 40
7	acres must be the quote, unquote, termed native soil as
8	a reference to compare it to the other stuff with
9	asphalt, rock, glass, whatever, so the name "Native" got
10	stuck to those samples.
11	What is of issue is the primary material
12	out there is a black clay with rock over the 40 acres,
13	so that got slid in as native. Whether it's truly a
14	native or a farm ground or native for a quarry or for
15	whatever, because native means different things
16	depending on who wants to log it and what they want to
17	use for their basis, so the term "Native" stuck with
18	black clay with rock because that was the predominant
19	soil type or notation in the logs of what was seen over
20	the entire 40 acres.
21	UNIDENTIFIED MALE: So are you saying,
22	Dave, that what you called native or natural, like
23	because of the word you used, may, in fact, be fill,
24	you're not certain, is that what you're saying?
25	UNIDENTIFIED MALE: Yes, fill could be

Γ

KELLY AR # 3401.1 Page 15 of 121 14

1 anything. Fill could be the natural materials that were 2 moved around and replaced back down in the same spot. 3 UNIDENTIFIED MALE: So I think we now 4 agree, and I no longer have, you know -- If I understand 5 you correctly, I think what you're saying is that the 6 samples that you were calling natural --7 UNIDENTIFIED MALE: No, no, no, nobody, 8 nobody called them natural. The term "Native" got put 9 to them because that was the predominant soil type. 10 Nobody used the word "Natural." 11 UNIDENTIFIED MALE: Okay, excuse me. Ι 12 thought that's the word you used. But regardless, I 13 think of them as almost synonymous. But what you called 14 native may, in fact, have been brought in from 15 elsewhere. It's not necessarily the soil that was 16 originally there before disturbed by man, is that 17 correct? 18 UNIDENTIFIED MALE: The same as what 19 happened at North Kelly Gardens. That's not natural and 20 native either. 21 UNIDENTIFIED MALE: Well, that I don't 22 know about. 23 UNIDENTIFIED MALE: And the other thing 24 is on the background sample collection, so-called 25 native, he saw chunks of asphalt just sitting right next FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

1 to your sample. 2 UNIDENTIFIED MALE: Yes. 3 UNIDENTIFIED MALE: Yes, (Inaudible). I think there's a 4 UNIDENTIFIED FEMALE: 5 couple of points that I would like to make at the end 6 here. 7 UNIDENTIFIED MALE: Sure. 8 UNIDENTIFIED FEMALE: It's regarding the 9 importance of whether this is fill or native soil or 10 whatever. 11 It's really important to us to verify if 12 something is native soil, if you're trying to establish 13 clean background. Don't take, you know, samples 14 obviously from an area that was brought in from 15 someplace else or obviously contained native, so we 16 usually take the samples from the area that's clean, you 17 know, from the native soil and usually run a complete 18 scan. We don't want to see the organics showing up. 19 So that issue is so high, then what we 20 look at and what we're concerned about is what are these 21 exposure pathways and what are the concentrations for 22 those exposure pathways. So I think the questions that 23 we need to be asking ourselves now is regardless of what 24 it is, it is what it is. 25 Now we have to look at led

KELLY AR # 3401.1 Page 17 of 121 16

1	concentrations, are they an issue. And a lot of the
2	original samples were taken at zero to six inches, which
3	would provide the normal surface exposure pathway. That
4	would be an interval that we would be concerned with or
5	the inhalation or ingestion. And then we got other
6	samples that were taken, you know, between five feet.
7	We've got some other ones that were taken
8	at one and a half to two feet. That would be, I guess,
9	the later samples that were taken. So it's really more
10	important, it's most important at this point to kind of
11	reconstruct what are the exposure pathways, what are we
12	trying to represent and do we actually have a health
13	impact from those concentrations. If we do, we need to
14	look into source control.
15	But from what I'm looking at here, you've
16	got the samples that would be taken directly across
17	let's see (Inaudible) Drive, and those are taken at
18	zero to six inches and those values are running 37, 22
19	and 28.2, you know, 25, 16. And then you took five
20	samples later that, or the Air Force did, at intervals
21	of one and a half to two feet, and those are running
22	18.6, you know, 20.4 and 18.5, which indicates to me,
23	for that level of effort, that we don't have an issue
24	with exposure from the surface and we're not sure it
25	will increase with depth, which is what we would expect

Γ

KELLY AR # 3401.1 Page 18 of 121 17

1	from those concentrations.
2	Now at site S-5, where you have your
3	higher values coming in, you've got a value of 17.65,
4	you know, (Inaudible), which is showing at three to five
5	feet. That's more of an indication of (Inaudible) at
6	the site. That would not be a concern for surface
7	exposure.
8	So we almost have to, at this point, to
9	sort out what do we have, what does it mean to us and is
10	there implications for doing source control on base.
11	UNIDENTIFIED MALE: Yes. And I agree
12	with all your points but I think there's two additional
13	points that I'm concerned about, although as a new job
14	at TPA, may not matter to you.
15	One is can the sampling that was
16	performed detect contamination events? Can they help us
17	delineate pathways? And I think the answer to that is
18	no, they can not.
19	UNIDENTIFIED MALE: We disagree with
20	that.
21	UNIDENTIFIED MALE: Okay. So I guess
22	that's my main point; can they be used to delineate a
23	pathway?
24	UNIDENTIFIED FEMALE: The other thing to
25	consider is also is if you're concerned about run-off,
	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

0100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS / PHONE: (210) 340-6464 / FAX: (210) 341-5533

1 metal is usually concentrated in the upper six to twelve 2 inches. 3 UNIDENTIFIED MALE: Yes, I agree. 4 UNIDENTIFIED FEMALE: And with the kind 5 of soil types you have here, you're not going to move, 6 you know, vertically, so you're not going to see an 7 increase with depth unless you have some of the things 8 going on like, you know, solvents being disturbed, 9 higher pH. 10 UNIDENTIFIED MALE: Or unless the 11 contaminants were buried at a later date, which may well 12 have happened here. And the scenario for that is the 13 contaminant washes --14UNIDENTIFIED FEMALE: (Inaudible) though 15 because how deep would they have to be buried and what 16 would be the exposure pathway to do that? UNIDENTIFIED MALE: Well, here's a 17 18 scenario. Let me take two minutes to draw it out. 19 Suppose we have a flood occur and that the pathway does, 20 in fact, exist, that this material washes into the 21 neighborhood and deposits led ground deep. Then some 22 years later, fill gets put down over that soil horizon 23 which led was deposited and then some years later, more 24 fill gets put down over that soil horizon, which is the 25 type of event we know occurred just north of Berman Road

KELLY AR # 3401.1 Page 20 of 121

1	area, because I've only been looking at that area for
2	about a year and I've seen that happen. David has seen
3	it often. So if you were then to go take your soil
4	sample from the first six inches, hoping to detect that
5	event that occurred some number of years ago but is now
6	perhaps buried two feet down, you wouldn't detect it.
7	UNIDENTIFIED FEMALE: Well, I think you
8	would have to be (Inaudible) too, in that you're also
9	adding fill also in the neighborhood too because you
10	would not expect, if you had run-off from the base, you
11	would expect to see that with the zero to six inch
12	samples because it's probably not going to go any deeper
13	than that.
14	UNIDENTIFIED MALE: I think we did see
15	that, absolutely.
16	UNIDENTIFIED FEMALE: Well, not at very
17	high concentrations. I'm looking at, you know, 37, 22,
18	28, and the highest sample you had was 65.
19	UNIDENTIFIED MALE: That's right. And
20	the statistically determined background level that the
21	Air Force calls background is 23 or 24.
22	Now to me, that says concentrations of
23	led in the neighborhood were elevated by some mechanism.
24	UNIDENTIFIED MALE: Unless background
25	samples collected of the unaffected area on base is a

Γ

KELLY AR # 3401.1 Page 21 of 121

1 different scenario. Plus all the values in the 2 neighborhood are below health effects. 3 UNIDENTIFIED MALE: Well, I'm not, you 4 know, arguing about health effects. You can see 5 Dr. Dolin. The other night she had a very good talk 6 about the health effects of low levels of many different 7 things. 8 UNIDENTIFIED FEMALE: Well, the other 9 point to consider also is where was the highest 10 concentration of the sample that you took? And if I 11 recall, it was the one that was the farthest away from 12 the base, is that right? 13 UNIDENTIFIED MALE: That's right. 14 UNIDENTIFIED FEMALE: It was near 15 (Inaudible) Roadway. 16 UNIDENTIFIED MALE: That's right. 17 UNIDENTIFIED FEMALE: Which is what you 18 would expect. You would expect higher concentrations, 19 you know, near a roadway. So when you start moving back 20 into the neighborhood, you're seeing again low 21 concentrations in your attracted area to base 22 background. You're looking at very, very low levels. 23 You've got a number of different sources 24 for led. You're not seeing elevated concentrations. Ιt 25 would be very tough to try to separate what is just, you

KELLY AR # 3401.1 Page 22 of 121 21

1 know, led concentrations near a roadway versus trying to 2 actually, you know, delineate a source. I think it's 3 going to be very tough. 4 UNIDENTIFIED MALE: I don't disagree with 5 that. 6 UNIDENTIFIED FEMALE: And what we would 7 fall back on too is we look at a screening level for 8 residential areas as 400, which is really significantly 9 higher. The TNRCC has an actual level of 500. 10 UNIDENTIFIED MALE: I understand, I 11 understand. And as I said in the past, there's more 12 than health issues here. There's the issue of does the 13 pathway exist, which I think is quite important. 14 Anyway, I've had my say and if there 15 aren't any more questions -- I'm sorry, I didn't mean to 16 interrupt you. 17 UNIDENTIFIED FEMALE: I think if you did 18 have a pathway, I think you would see residual 19 concentrations and I don't think we're seeing that, or 20 what we're seeing is, you know, basically a background 21 of just above. 22 UNIDENTIFIED MALE: Or at least a pattern 23 of elevated levels going into the concentrated in some 24 direction --25 UNIDENTIFIED MALE: I would say the FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

KELLY AR # 3401.1 Page 23 of 121

1 reason we don't see that pattern is because it's been 2 disturbed by the placement of fill. We have not sampled 3 the proper samples. We don't know what the proper 4 samples are any longer because of the fill. 5 Yes? UNIDENTIFIED MALE: Well, when they 6 7 talked about fill being brought in there, the first thing you got to know is what kind of compacting did 8 they have on that fill. And then if there were several 9 10 different fills, you can delineate that with a cut of 11 that soil over top of it. That's going to be there. I don't care if it was 50 years ago, 200 years ago, that 12 13 fill will still delineated. Different fill, if they put 14 it in one time, that's it. 15 UNIDENTIFIED MALE: Yes. 16 UNIDENTIFIED MALE: And when you dig that 17 hole, you don't see that. I don't really follow what 18 we're talking about. 19 UNIDENTIFIED FEMALE: Well, I think we're 20 actually talking about several different issues here. 21 And I just what I'm wondering --UNIDENTIFIED MALE: I'm having trouble 22 23 tying them together. 24 UNIDENTIFIED FEMALE: Yes, I understand. Let me ask you this. If we look at a point by point, do 25 FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

KELLY AR # 3401.1 Page 24 of 121

1 we still have the information here that would indicate 2 which one of these, you know, sample points are actually 3 from fill and which ones were from native soil? UNIDENTIFIED MALE: Yes. 4 5 UNIDENTIFIED FEMALE: Can we go ahead and 6 pull that right now? 7 UNIDENTIFIED MALE: Sure. 8 UNIDENTIFIED FEMALE: Because I think 9 until we do that, we're going to be, you know, talking 10 about this issue for a long time. 11 See, for example, 1504, 1505, 1404, 12 1405. 13 UNIDENTIFIED MALE: May I make a 14 statement here just to make sure that we're all on the 15 same page? 16 Right now, the CH2M Hill says that none 17 of the samples that it collected are necessarily natural 18 soil or native soil, whatever you want to call it. All 19 of them may have been brought in from somewhere else. 20 They may be fill. That's my understanding. 21 They may be --UNIDENTIFIED MALE: 22 Or they may be UNIDENTIFIED MALE: 23 native, yes. 24 UNIDENTIFIED MALE: Well, even if it were 25 natural soil, if they went in there and started up and FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

KELLY AR # 3401.1 Page 25 of 121 24

1 just like you go in and stood on red clay the whole 2 time, go in there and turn the soil and mix the clay 3 with the sand on top and make it a sandy loam. So if 4 they done something like that, you know, and then 5 compacted it, they run rollers over it, they might have 6 got it to where it's like concrete. 7 UNIDENTIFIED MALE: There's documentation 8 that there has been traffic on that area outside the 9 base. It was used as a staging area. 10 UNIDENTIFIED MALE: Those are the things that have to be determined before you can -- I mean, 11 we're talking about the wrong thing, I think. 12 13 UNIDENTIFIED MALE: Well, I don't think 14 this is necessarily an impossible task to take all these 15 out --16 UNIDENTIFIED MALE: I know, but we're 17 approaching it the wrong way, I think. 18 UNIDENTIFIED MALE: But I think in order 19 to have data that you could interpret meaningfully here, 20 you have to do an extremely detailed study of those 21 soils and, like you said, look at where those breaks are, this level of fill, this level of fill, and test 22 23 them as individual samples and analyze them. 24 UNIDENTIFIED MALE: Now for that, we did 25 the supplemental sampling. We went into areas that had

KELLY AR # 3401.1 Page 26 of 121 25

1	been designated to have the constituents that labeled it
2	fill and we went back after that for supplemental
3	samples. They were the one to two foot. And if you
4	look closely at that, there were 12 of them. Most of
5	them in that area right around where the RAB members or
6	people that were present at the first sampling said
7	run-off would have occurred. And in those samples, we
8	again cored and found a range of some sort of
9	demarcation to whoever was drilling the course out
10	there, a hydrogeologist, there was some demarcation in
11	there, ranging from a half a foot down to a foot and a
12	half down. That's where we collected the supplemental
13	soil samples. They were collected, and from whatever
14	that demarcation was down to a maximum of two feet,
15	because that's what's used in driving risk assessments,
16	and multiple cores may have been required to get the
17	total volume needed. The analyses was re-run. And to
18	my recollection, in all cases, those second samples had
19	at or lower led values than those marked as containing
20	some sort of fill at the surface.
21	UNIDENTIFIED MALE: I think that's
22	correct in almost all. I think there may be a couple.
23	UNIDENTIFIED MALE: Well, another thing
24	happened there. Whenever this supposed flood came and
25	the led was moved around, if there was vegetation on

Г

KELLY AR # 3401.1 Page 27 of 121 26

that soil at that time, that covering of vegetation, 1 2 grass, whatever, it would have been bored (Inaudible) 3 into the sub-soil and other things. If they would have packed the ground, chances are (Inaudible). It stayed 4 5 pretty well on the surface of wherever the surface was 6 at that time. I know there's a lot of questions based 7 8 on what you all are talking about that were not 9 answered, not approached. 10 UNIDENTIFIED MALE: Well, let me say 11 something here. First of all, there were two issues that we were going to put on the agenda today. We were 12 13 just handed this one. 14 The issue, the two questions, getting back to your point, Sam, the first one is does the data 15 that's been collected -- First of all, the neighbors in 16 the area said we have a health problem. We believe that 17 the health problem may be caused by exposures to led and 18 a couple other contaminants. So Kelly then went out and 19 their contractors took samples. We have a contract and 20 then oversight by another contractor, to take a look at 21 to see are there led concentrations or other 22 23 contaminants in the area, that based upon the 24 concentrations found, would these concentrations pose a 25 health problem to the local residents. That question

KELLY AR # 3401.1 Page 28 of 121

1 was asked. The answer that has come back, the 2 preliminary answer, and preliminary meaning we don't 3 have the final report that's come back. The answer is 4 no.

5 The next question that is now coming 6 about is could there be a pathway. Even though there 7 may not be a health problem, is there a pathway that is 8 being shown by this data, called the data sets, is there 9 a pathway that shows that in the case of what we're 10 talking about here, led, that came from Kelly Air Force 11 Base and actually went out into the community?

The information that we collected, not we Kelly, but by the contractors, indicates that there is no pattern to this such that there's no belief that the led came from here and was disbursed out there.

16 A supplemental question came in from 17 various people saying you've got jet fuel storage tanks 18 You had led stored in those tanks. over there. We've 19 gone back to talk to the vendors that have provided the 20 fuel and the vendors for the current JP8's, the vendors 21 for the JP4 -- the JP4 was stored in these tanks prior 22 to what is stored there now -- and provided data that 23 said we did not use led in the fuel, nor was it used as 24 an additive to the fuel coming into Kelly Air Force 25 Base, so what we've done is to provide this information

> FEDERAL COURT REPORTERS OF SAN ANTONIO, INC. 10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

27

1	to the public.
2	What we are now, what has occurred,
3	there's a letter that Mr. Breohouse (?) wrote to
4	Mr. Rice, dated a couple weeks ago, and I believe you
5	got a copy, and it basically says we've been through the
6	sampling, we've collected our data, we submitted it for
7	scientific review to the regulator, Ms. Scuny and her
8	counterparts at EPA, and Gary Byers and his counterparts
9	at the state. If there's something inconsistent with
10	this that we need to know about it, please let us know,
11	but until the final report comes out, we're not going to
12	go back out there and collect more samples because of
13	what the information shows.
14	So those are the specific questions as we
15	see them and those are the answers that we provided
16	today.
17	UNIDENTIFIED MALE: Okay. Camille, did
18	you want to go through those things on a point by point
19	basis?
20	UNIDENTIFIED FEMALE: Well, it would be
21	best, I guess, that we wait till the final report is out
22	and then go over all the information.
23	UNIDENTIFIED MALE: Okay. In that case,
24	I'll just wrap up now and just say that regarding my
25	main points today, that what was collected out there is
l	

KELLY AR # 3401.1 Page 30 of 121 29

probably not native soil or natural soil. That's 1 2 probably fill. I think that CH2M Hill and I are in agreement, that these samples do not represent natural 3 4 or native soil. They represent something that was 5 brought in from elsewhere. UNIDENTIFIED MALE: No, I have to contest 6 7 that. 8 UNIDENTIFIED MALE: No, that's not 9 correct. UNIDENTIFIED MALE: Okay, then please 10 11 correct me. Please correct me. What do they 12 represent? 13 UNIDENTIFIED MALE: They represent the soils most commonly out there. Or no, they actually 14 represent the soils that are out there now, over the 40 15 acre area. I mean, they represent what is there. It's 16 17 a black clay with rock, it's most common. There are areas with materials in there that include asphalt, base 18 19 course, et cetera. 20 The materials, in some places, have been driven over. A lot of people out there park their cars, 21 and a true determination of whether they are a natural 22 occurring soil or a native soil can't be determined. 23 They may or may not be. They may have been reworked. 24 25 It's obvious that through building the subdivision and

1 the work out there, that everything out there at some 2 point has been disturbed. 3 UNIDENTIFIED MALE: Okay, I still think 4 we're in agreement. The soil samples that were 5 collected may or may not be a native soil. It's 6 difficult to tell. I contend they're virtually all 7 fill, but we're certainly much closer now than I thought 8 we would be when the meeting started. 9 UNIDENTIFIED MALE: It's also 10 representative of what would have been there when this 11 flooding took place. 12 UNIDENTIFIED MALE: You don't know that. 13 UNIDENTIFIED MALE: What is to say it 14 wasn't? 15 UNIDENTIFIED MALE: Wait, wait, wait. 16 We're not going to get into a debate here. 17 UNIDENTIFIED MALE: Yes. Okay, so 18 that's, I guess, the end of the first part, and Joe 19 Brewer from Southwest is going to tell us about air 20 monitoring plans in the same area, North Kelly Garden 21 area. Joe. 22 MR. BREWER: I made some copies of the 23 view graphs -- unfortunately didn't make enough, so I'm 24 just going to put them on the table here. I can get 25 some more if somebody really wants them.

KELLY AR # 3401.1 Page 32 of 121 31

1 Well, I'd like to start out by saying 2 this presentation was prepared originally for the public 3 meeting, so please, if there are any questions, go ahead 4 and interrupt. I don't know if it's going to carry the 5 detail that you need here. 6 This slide gives us an idea of the 7 program status currently and the yellow line represents 8 where we are currently. We've looked at the chemistry 9 of the JP-8 fuel stored at 1592 and we have also looked 10 at analytical and collect methodology for conducting 11 ambient air surveys in the 1592 area as well as North 12 Kelly Gardens. 13 The remaining tasks are to look at the 14 actual release point, 1592, measure JP-8 constituents in 15 the North Kelly Gardens area and then evaluate the 16 community risks associated with those JP-8 constituents. 17 UNIDENTIFIED MALE: Joe, 1592, are those 18 the tanks? 19 MR. BREWER: Yes. When I refer to 1592, 20 I'm talking about the whole storage complex, including 21 distribution points, valving, piping, tanks, the whole 22 nine yards. 23 UNIDENTIFIED MALE: Okay. 24 MR. BREWER: The goals of the overall 25 program is to measure the fugitive emissions from 1592

KELLY AR # 3401.1 Page 33 of 121

1 and specifically look at sub systems within the site, 2 the storage tanks, the leaks from the floating pans into 3 the atmosphere, distribution systems, valving, pumping, 4 specific operations within the system and north 1592 5 area as a whole. 6 We use that data to locate and determine 7 sampling procedures for the neighborhood, North Kelly 8 Gardens, and we'll collect samples there and then we'll 9 use those numbers to evaluate the community health 10 risks. 11 When we looked at JP-8, I'm sure all of 12 you know that JP-8 is a multi component compound similar 13 to JP-4 and kerosene, with one major difference. The 14 compounds in JP-8 are skewed more to the heavier 15 constituents and as a result, your head space 16 concentration or the airborne component of JP-8 is a 17 much lower concentration that you had see in JP-4 or 18 kerosene. 19 The one point that I want to mention is 20 that the vapor compounds or components in the head space 21 that are an associated with risks are present in JP-8, 22 they are at lower concentrations. And one specific 23 compound is benzene, which we're concerned with right 24 now. 25 A lot of people don't find benzene in

FEDERAL COURT REPORTERS OF SAN ANTONIO, INC. 10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533 32

1 bulk analysis of JP-8, but in the head space analysis. 2 there are trace levels of benzene. 3 We selected NIOSH Method 1550, which 4 employs a charcoal collection and carbon disulfide 5 desorption of the samples in order to look at the 6 hydrocarbons in ambient air. 7 A technique was needed to differentiate 8 those components associated with JP-8 from the ambient 9 background concentration so we selected four indicator 10 compounds, Methylcyclohexane, Nonane, Decane and Octane, 11 to be indicative of the JP-8 component in the ambient 12 hydrocarbon background, and we're going to use those 13 four indicator compounds in the samples ratioed back to 14 the original JP-8 head space concentration to get an 15 idea of what contribution JP-8 has to the overall 16 ambient hydrocarbon data. 17 UNIDENTIFIED MALE: Joe, I guess those 18 are the most volatile or maybe the most common? 19 No, actually they're the MR. BREWER: 20 most indicative of JP-8 and some of them aren't very 21 volatile. For example, Decane and Nonane are fairly 22 substantial compounds, which in JP-4 are at much lower 23 concentrations than something like benzene but they're a 24 major components in JP-8 head space. 25 UNIDENTIFIED MALE: Basically air

KELLY AR # 3401.1 Page 35 of 121

1 sampling? 2 MR. BREWER: Yes. 3 UNIDENTIFIED MALE: What kind of control 4 was used? When you're talking about this JP-8, what 5 kind of a natural control did you use to compare it with led? 6 7 MR. BREWER: What, sir? 8 UNIDENTIFIED MALE: To differentiate from 9 the ambient? 10 UNIDENTIFIED MALE: Yes. What do you use 11 that to compare that to? 12 UNIDENTIFIED MALE: To differentiate it 13 from the ambient hydrocarbon background, these four 14 indicator compounds aren't prevalent to a great extent 15 in background hydrocarbon concentrations. 16 UNIDENTIFIED MALE: You're talking about 17 air, clean air? 18 UNIDENTIFIED MALE: Yes, sir. 19 UNIDENTIFIED MALE: They're not common in gasoline, for example? 20 MR. BREWER: Well, they are in gasoline 21 22 but not to the extent they are in JP-8. And using this 23 mechanism, hopefully because there's a unique ratio that 24 those compounds have in JP-8 head space, we'll be able 25 to differentiate --

> FEDERAL COURT REPORTERS OF SAN ANTONIO, INC. 10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

34

1 UNIDENTIFIED MALE: Now when you say head 2 space, what are you talking about? 3 MR. BREWER: The space above a liquid 4 pool of JP-8, so you have say a storage tank and you 5 change the level --6 UNIDENTIFIED MALE: That's the head 7 space? 8 MR. BREWER: Right. And there's going to 9 be a concentration of these compounds in that head 10 space. 11 UNIDENTIFIED MALE: In other words, 12 you're not talking about like air in this room, you're 13 talking about --14 MR. BREWER: You have an ambient 15 hydrocarbon background in this room. 16 UNIDENTIFIED MALE: Okay. And what kind 17 of a situation do you have that's native that this 18 information can be compared to? 19 MR. BREWER: We're going to collect 20 background information at the time of sampling. We're 21 not going to use historical data. 22 Well, we'd like to UNIDENTIFIED MALE: 23 get that in an open (Inaudible). 24 MR. BREWER: We're going to collect 25 background data in North Kelly Gardens at the time of
1 the survey. 2 UNIDENTIFIED MALE: I mean, are you going 3 to get far enough way to where none of this will be 4 effected? 5 No, sir. The object of the MR. BREWER: 6 game is to determine what component of that background 7 hydrocarbon is associated with 1592. In order to do 8 that, you have to get in the same area, not in the plume 9 but in the same area. 10 UNIDENTIFIED MALE: Upwind. 11 I've got a map. We'll get MR. BREWER: 12 to that and maybe that will help us out a little bit. 13 UNIDENTIFIED FEMALE: The four indicator 14 compounds again were? 15 Methylcyclohexane, which is MR. BREWER: 16 the most volatile of the four, Decane, Octane and 17 Nonane. 18 UNIDENTIFIED MALE: Joe, why aren't you 19 choosing the most volatile or the most likely to escape 20 components? It seems to me if you were trying to detect 21 an emission, you would want the things that are most 22 readily omitted. 23 MR. BREWER: Well, there's a fine line. 24 Methylcyclohexane is fairly volatile. The problem with 25 the very live end hydrocarbons is they're everywhere and

KELLY AR # 3401.1 Page 38 of 121

1 it makes it more difficult to say yes, this amount of 2 JP-8 is present and so you pick something that is unique 3 to JP-8. 4 UNIDENTIFIED MALE: Since you're going 5 this route, is it possible that there will be emissions 6 at some level that you just won't detect because of the 7 indicator compounds? 8 There's a detection level, MR. BREWER: 9 yes. UNIDENTIFIED MALE: I think we don't want 10 11 to confuse the fact that we're sampling everything that 12 we can see. However, because JP-8, there's no such 13 thing as JP-8. I mean, it's a collection of things that 14 is distillery range. The refinery makes it. It starts 15 at one temperature --(Tape cut off. End of Side 1.) 16 17 (Beginning of Side 2.) 18 UNIDENTIFIED MALE: (Continuing) -- the 19 carbons above it, it would be almost impossible to tell 20 the difference unless you looked at very carefully the 21 distribution of those different types of compounds that 22 make it up, because gasoline is more volatile. It has 23 compounds that evaporate easy so they're much more 24 lighter compounds, if you will. 25 So the JP-8 has a little bit heavier

KELLY AR # 3401.1 Page 39 of 121

-	
1	compounds in it so, you know, they're more distributed
2	that way, so to try to calculate back to what JP-8 will
3	evaporate, you've got to use some indicator compounds,
4	and so we'll use these four indicator compounds, which
5	have no health relevance at all. I mean, they're just
6	indicators of JP-8 itself, and then we can back
7	calculate to the amount of JP-8 that actually leaves the
8	tank or the pump or during the transfer.
9	Now during the sampling, we'll be looking
10	for those compounds in addition to those that have
11	health relevance. You know, things like the toluenes
12	and the benzines and so forth like that, which really
13	are required to do the health risk.
14	But as Joe points out, because this is an
15	urban environment, people use gasoline, people use other
16	solvents and there's other industrial operations, many
17	of these compounds are ubiquitous in our atmosphere, so
18	to avoid, you know, associating those if they're in the
19	background with the actual operation of this fuel
20	storage transfer operation, we'll collect samples upwind
21	that we'll say okay, this is what the wind has in it,
22	the clean air, and I hate to use the word clean air in
23	San Antonio in this industrial environment but the air
24	that is not associated with the JP-8, we'll use that as
25	a background and say okay, as it goes by the storage

Γ

FEDERAL COURT REPORTERS OF SAN ANTONIO, INC. 10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533 38

KELLY AR # 3401.1 Page 40 of 121 39

1 facility now, it will pick up some level of these 2 hydrocarbons that are from JP-8 and we'll try to tell 3 the difference that is, you know, the increase in 4 concentration that's seen as, you know, things are 5 volatilized out of the operation. 6 UNIDENTIFIED MALE: What will the control 7 mechanism be? 8 MR. BREWER: Let me get to some plots 9 here. Let me get to some maps here, and basically I'll 10 go through 90 percent of this. But anyway, so we have a 11 mechanism to calculate JP-8 related emission. 12 Additionally, as Mike said, we have to 13 look at certain individual compounds such as benzene and 14 toluene that are associated with risks on their own as 15 individual components, and that will be collected also 16 using this charcoal procedure. 17 To do the fugitive or system 1592 18 releases and to characterize that, we're going to use 19 point monitoring and area monitoring to look 20 specifically at all distribution points, all individual 21 operations within the facility and the tank leak 22 points. That's going to be the first step. And in 23 doing that, that's going to give us a release amount 24 from system 1592, and we're going to take that amount, 25 model it into the neighborhood to establish our

1	locations in the neighborhood.
2	Now we have to be careful in doing this
3	because most fugitive studies are done over the course
4	of years so you incorporate environmental conditional
5	changes, you incorporate operational changes.
6	The other way to do this is to develop a
7	worse case situation at the site so you do a
8	conservative estimate of release, and the release
9	technique we have chosen, so we have established worse
10	case operating conditions for 1592, which will allow us
11	to use the single event and say this is representative
12	of any possible scenario that can occur at 1592, and
13	that worse case event must be reasonable as far as the
14	operation.
15	You can't do like they did up in Austin
16	and say, well, right now we're going to assume every
17	valve in the place is leaking and all the trucks have
18	turned over and that's going to be our maximum possible
19	release. Well, that's not being realistic.
20	We have selected an increased rate and
21	frequency of truck filling and emptying of about eight
22	fold as our worse case and we have also gone in and
23	evaluated the optimum environmental conditions to give
24	us the highest concentration down wind in the
25	neighborhood, and those environmental conditions are

F

KELLY AR # 3401.1 Page 42 of 121 41

very low wind speed and elevated ambient temperature 1 2 that have the biggest impact on down wind concentration. So when we do any of this sampling, we're 3 4 going to be looking at this worse case operating 5 condition and have environmental conditions that are conducive to elevated concentrations. 6 UNIDENTIFIED MALE: I don't think I'm 7 8 following you, Joe. Are you actually going to conduct 9 these worse case conditions out there when you collect 10 your samples? Well, with as much influence 11 MR. BREWER: as I have over the ambient temperature and wind speed, 12 13 yes. We're going to line up trucks. 14 UNIDENTIFIED MALE: So there will be 15 physical things out there, this is not just a 16 mathematical study? 17 MR. BREWER: No. UNIDENTIFIED MALE: You'll pump gas and 18 19 do all that stuff? 20 MR. BREWER: They're going to line up 21 trucks to have a continuous through-put of trucks at 22 basically double. The rate is going to be doubled. 23 We're going to fill them and cycle two trucks instead of 24 one and we're going to do it continuously over the 25 event.

KELLY AR # 3401.1 Page 43 of 121 42

1	UNIDENTIFIED MALE: Now when you say
2	ambient temperature, are you talking about soil
3	temperature, air temperature?
4	MR. BREWER: Air, ambient temperature.
5	UNIDENTIFIED MALE: Do you consider the
6	soil temperature in your study?
7	MR. BREWER: I have a summary slide.
8	This study is to look at current JP-8 handling and
9	storage operations as to that impact on the
10	neighborhood, we're not going to look at deposition,
11	we're not going to look at stuff coming up from the
12	soil. We're going to look at JP-8 associated risks and
13	that's it.
14	UNIDENTIFIED MALE: (Inaudible) that soil
15	temperature on your air temperature?
16	MR. BREWER: It will be covered in the
17	ambient temperature, yes, sir. We only need to take
18	measurements of the storage temperature in the tanks and
19	then the ambient temperature in the environment, because
20	what ambient temperature increases drive is the amount
21	or concentrations of these hydrocarbons that are in the
22	head space above the fuel. The higher the temperature,
23	the higher the concentration in that vapor. So soil
24	temperature really doesn't enter into it, other than it
25	heats up the tanks to some extent.

KELLY AR # 3401.1 Page 44 of 121 43

.1	UNIDENTIFIED MALE: And with the worse
2	case scenario, we'll be able to measure the maximum
3	possible emissions, look at the worse possible air
4	effects on North Kelly and allow the maximum health
5	risks to be predicted.
6	UNIDENTIFIED MALE: I'll get to the
7	maps.
8	MR. BREWER: Once we have this release
9	rate at 1592, we're going to model that concentration
10	into the neighborhood to assure that the techniques we
11	use in the neighborhood will give us adequate
12	sensitivity and allow us to select the proper location
13	to measure the plume from 1592.
14	Just for an example, we did an estimate
15	using a two truck fill system, where we calculated the
16	release rate from filling two trucks at a time over one
17	hour and these are the resulting airborne concentrations
18	that we modeled to 600 meters out from system 1592. And
19	you can see here the normal production rate, which is
20	currently what goes on at the site, and our worse case
21	scenario that we're going to sample under, and you can
22	see the difference in concentration. It's about eight
23	fold.
24	And just for information, the property
25	line is at 130 meters, the neighborhood starts at about
	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

KELLY AR # 3401.1 Page 45 of 121

1 150 meters from the site. The number that we'll use in 2 this instance is the TNRCC screening limit over one hour 3 of a thousand micrograms per cubic meter, and we'll get 4 into those numbers in a second. 5 The Effected Screening Limit or the ESL 6 which we're going to use to see if we're in criteria or 7 not or to see if we have a problem is based on many 8 other things besides health risks. Specifically odor, ventilation effects and corrosion. 9 10 For example, hydrogen sulfide, you can 11 perceive that compound at a level much below anything 12 that would cause a health risk. Well, that's kind of 13 like the ESL's. They're based on things other than 14 health effects. 15 The important thing is that we must be 16 able to measure the compounds at the ESL, and therefore 17 our background concentrations must be statistically 18 valid to a point where we can differentiate the ESL in 19 our sample from the general background in the area. And 20 at these very low concentrations, that's extremely 21 difficult to do so we're going to put an emphasis on 22 background concentration monitoring. 23 UNIDENTIFIED MALE: Your ESL's, are they 24 the same as your detection limits? 25 MR. BREWER: No, no, some of them are for

1 some compounds, but that's our point in saying we're 2 going to model this stuff to assure that our method will 3 give us the sensitivity that we need. 4 UNIDENTIFIED MALE: So you'll attempt to 5 be as sensitive as you can in detecting these things? 6 MR. BREWER: Right. 7 UNIDENTIFIED MALE: One point needs to be 8 made on that ground. Those concentrations were as 9 JP-8's, and it's a funny number because even though, as 10 JP-8's, you may be measuring only a few parts per 11 million of the material, but when you back calculate that to JP-8, it becomes small. That's just the way the 12 13 method is set up, because you actually calibrate with 14pure JP-8, you know, itself, but then you start looking 15 at volatile components in there and they're much 16 different, so you've got to -- it's a funny way of 17 looking at what an ESL is based on, because it's based 18 on total JP-8. 19 MR. BREWER: Now there are ESL's for 20 specific compounds as well, and to kind of get at what 21 you were referring to, at 260 micrograms per cubic 22 meter, the individual compounds, be that toluene, 23 benzene, xylene, whatever, are down two orders of 24 magnitude below that. So our method has to get down 25 that low to see it, so yes, we are on the bottom end.

KELLY AR # 3401.1 Page 47 of 121 46

1	UNIDENTIFIED MALE: But we're going to be
-	able to adjust that through extended run times and flow
2	able to adjust that through extended functimes and flow
3	rates to make sure we have adequate sensitivity.
4	MR. BREWER: But once we model the thing
5	out, this is a plot of what a south south-westerly wind
6	would plot out to as far as sampling locations, and bear
7	in mind we're not establishing a grid across the entire
8	neighborhood. The sampling approach is going to be to
9	set up a perimeter, if you will, to define the plume of
10	airborne release. So what we want to be able to do is
11	see an increase along this center line, which is down
12	wind, compared to background samples collected in this
13	area.
14	So to define the plume, we're going to
15	take four center line distances, as you can see there,
16	and two distances at 300 meters, and on the property
17	line, we're going to extend laterally to ten percent of
18	the center line concentration and a half percent of the
19	center line concentration, and that's a standard
20	practice to define plumes that way.
21	UNIDENTIFIED MALE: I'd like to point out
22	that those little dots there are where the sampling will
23	be.
24	UNIDENTIFIED MALE: But that's my
25	question. How mobile are these samples? I mean, if the
	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

Г

10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

KELLY AR # 3401.1 Page 48 of 121 47

1	wind shifts, do you move your sampling location?
2	MR. BREWER: No, you establish your
3	conditions in the morning. If you have environmental
4	changes and wind shifts and all that, the duration of
5	this event is not going to allow us to shift and you'll
6	have to make a decision whether you want to repeat it or
7	use that data.
8	UNIDENTIFIED MALE: Will you have a
9	little weather station set up?
10	MR. BREWER: Yes, we will. This will be
11	plotted the morning of the test so we'll actually site
12	the locations an hour before the test.
13	UNIDENTIFIED MALE: When you're doing
14	your background, there is no monitor south of the actual
15	physical complex that would
16	MR. BREWER: Yes, I was going to get to
17	that. You see here we have eight additional background
18	samples. That will probably be more like fifteen, of
19	which three are located upwind of 1592, one at 50
20	meters, and to separate, there's a parking area below
21	this, and I want to separate that so we'll go upwind of
22	that parking area as well.
23	There's going to be three or four samples
24	in this area to get background contributions from Berman
25	Road. General McMullin, which runs down here, will have

KELLY AR # 3401.1 Page 49 of 121

1	two set up probably in the neighborhood over here, in
2	order to establish the background and hopefully get some
3	kind of increase in concentration along this line so we
4	can define a plume. But as you can see from the
5	previous slides, the level is extremely low.
6	UNIDENTIFIED MALE: Also will humidity be
7	taken into consideration with this? Because that also
8	determines the volatility of specific compounds and
9	whether they stay in heavier concentrations or lighter
10	concentrations in conjunction with the ambient
11	temperature.
12	MR. BREWER: It's my understanding, and
13	somebody correct me if I'm wrong, that the temperature
14	of the fuel in storage is the primary motivator, if you
15	will, of head space concentration.
16	Now when you push that out into the
17	ambient air, high moisture contents and things like that
18	will allow migration on the droplets of moisture, but
19	then you get deposition.
20	UNIDENTIFIED MALE: Primarily these are
21	very what you would call hydrophobic compounds. They
22	don't like water. If you add something like an alcohol,
23	you would be absolutely right, in the fact that they
24	are, you know, water soluble and they would have an
25	effect on the evaporation, but these are very

Γ

1	hydrophobic, you know, gasoline type compounds that
2	shouldn't be effected.
3	MR. BREWER: So to answer your question,
4	the moisture content at the source, not that it really
5	doesn't play a part, once you get out into the
6	environment, the method that we're using will collect
7	anything that is there, so as long as it doesn't effect
8	the actual transport mechanism, which my understanding
9	it won't, we shouldn't have a problem with that.
10	We looked at ceiling height, wind speed,
11	wind direction, wind speed, ambient temperature. There
12	were a couple of other conditions that we looked at.
13	Mixing height.
14	UNIDENTIFIED MALE: The only reason I
15	bring that up is because the information that we
16	received from Dr. (Inaudible) and the other internal
17	medicine doctors is that the worse case scenario for
18	ingestion is actually through a high cubic content and I
19	don't think you're going to get any opposition to what
20	the volatility in the plume rows of the JP-8.
21	But I guess the other question is, using
22	this particular model, going back to associated pathways
23	and what not to include this, because we're the ones who
24	gave the original wind rows, would these calculations
25	also be made to do comparisons versus JP-4, JP-7,

```
50
```

1 considering the chemical weight, volatility, the whole 2 nine yards? 3 They can be, but the MR. BREWER: 4 importance --5 UNIDENTIFIED MALE: Are there 6 calculations that can be done so that calculations would 7 show -- (Inaudible). 8 MR. BREWER: Well, that's a fairly tall 9 order to do. 10 UNIDENTIFIED MALE: I mean, the point is 11 we don't even know what's going to happen in the defined 12 plume. 13 MR. BREWER: Yes --14 UNIDENTIFIED MALE: I guess what you're 15 doing is defining the tests to see whether or not it's 16 actually something that would really, really be --17 UNIDENTIFIED MALE: We're coming to grips 18 to see if we're even going to measure anything out there 19 because these measures are low. The only release point 20 of significance is the filling of transfer trucks. The 21 tanks are scrubbed, they have floating pans, so you've got very few leak points in that system. 22 23 Now we're going to look at JP-8 and you 24 can extrapolate things based on historical data to JP-7, 25 JP-4, whatever you'd like to do. The difference being

KELLY AR # 3401.1 Page 52 of 121 51

1	that we're not going to use any historical data in this
2	study. It's all going to be measured data.
3	MR. BREWER: And when we go to evaluate
4	risks, there's two primary standard areas that we're
5	going to use, the ESL from TNRCC and those compounds
6	which have reference doses through EPA. So the
7	individual components, if there's a (Inaudible)
8	referenced to us or one of the other ones, the east
9	table, those can be used to calculate the risks. And
10	the TNRCC ESL's are nothing more than a ratio of
11	concentration which we look at.
12	UNIDENTIFIED MALE: Cumulative effects
13	can be obtained simply through summing the individual
14	components.
15	UNIDENTIFIED MALE: Joe, could you just
16	give an overview of exhaustive research that Southwest
17	did in developing protocols and methodology?
18	MR. BREWER: For the analytical?
19	UNIDENTIFIED MALE: For this effort.
20	MR. BREWER: The one thing Well, I'm
21	not sure in doing the risk calculations, we haven't
22	really used
23	UNIDENTIFIED MALE: I'm just talking
24	about the sampling protocols and all that.
25	MR. BREWER: The sampling method
L	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

Γ

10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

KELLY AR # 3401.1 Page 53 of 121 52

1	selection was based on MDL studies, detection limits
2	studies and some rigorous spiking routines that we did
3	back in the laboratory to assure ourselves that we had
4	the sensitivity to see something like benzene at three
5	parts per billion in the ambient air under these
6	conditions, and that was part of that second tasking
7	block in the entry slide.
8	Charcoal, the NIOSH 1550 method is
9	accepted throughout the industry as an ambient air
10	sampling method for the NIOSH and workplace people. We
11	didn't know if it could be applied to this condition
12	under elevated collection flow rates and extended run
13	times so we had to do a series of spikes to make sure
14	that we had retention of the compounds on the charcoal
15	and then the extraction procedure gave us adequate
16	recovery.
17	UNIDENTIFIED MALE: Do you think this
18	method you're going to use is the most sensitive that's
19	practical to use out here?
20	MR. BREWER: Well, I think it's the only
21	method we can use because charcoal is comprehensive to
22	all of the components, all of the hydrocarbon components
23	there are there.
24	If you get into things like Tenex or
25	Chromasorb or other types of collection media, you
	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

Г

KELLY AR # 3401.1 Page 54 of 121 53

1	really skew yourself to either the very light end
2	compounds or the heavier compounds. Most importantly,
3	charcoal doesn't present an inherent hydrocarbon
4	background that you get with a lot of the other resins.
5	Resins that are polymer in origin, plastic beads or
6	whatever, contribute, when you go to extract them, they
7	release hydrocarbon components so you get cross
8	contamination. You don't have that problem with
9	charcoal.
10	UNIDENTIFIED MALE: So there are more
11	sensitive techniques but you don't think they're
12	appropriate?
13	MR. BREWER: No. The technique, the
14	sensitivity is going to be obtained in the
15	instrumentation, not necessarily the collection method.
16	We have established that the collection method will
17	retain and recover everything we put to it at the
18	sampling conditions.
19	The next step is to select the analytical
20	instrumentation that gives you the greatest
21	sensitivity.
22	UNIDENTIFIED MALE: I see.
23	MR. BREWER: For the JP-8 itself, JP-8 as
24	a whole, we're going to use GC mass spectrometry. We'll
25	probably have to go to a technique called selected ion

Г

KELLY AR # 3401.1 Page 55 of 121 54

1	monitoring for the higher risk components like benzene
2	and some of the xylenes and other components that are in
3	JP-8, so the analytical techniques are as sensitive as
4	available. And we additionally have high resolution
5	mass spec if we need it.
6	UNIDENTIFIED MALE: And your collection
7	method will collect virtually anything acidic?
8	MR. BREWER: That's why we selected
9	charcoal, yes, sir.
10	UNIDENTIFIED MALE: Got you. Thank you.
11	UNIDENTIFIED FEMALE: I think you
12	probably answered the question that I had. Earlier, I
13	guess you mentioned that some compounds, the ESL
14	detection limits. Are those any compounds that have a
15	risk?
16	UNIDENTIFIED MALE: Yes, benzene
17	specifically. And this is the whole reason for modeling
18	this stuff first before we site the locations, because
19	we have to assure ourselves that we can sample the
20	background and get a background number that will allow
21	us to tell the difference between background and low
22	parts per billion for these individual components like
23	benzene, and we have to get a statistically valid number
24	that says yes, you do have the detection limit to
25	differentiate three parts per billion or five parts per

Г

1	billion.
2	UNIDENTIFIED MALE: The real problem here
3	is when you look at actual urban atmospheres for like
4	benzene, they range from like ten to a hundred, and yet
5	the limit that supposedly you're supposed to release is
6	three, so you're trying to see a very small difference
7	in a large background. And you know, statistically,
8	that's very difficult unless you take hundreds of
9	samples and, you know, this study is not of the scope or
10	the money is not available to do these large samples, so
11	what we're trying to do is try to maximize everything
12	possible to see the greatest difference that this
13	operation has.
14	If we can't see anything over, you know,
15	background, which naturally varies; you know, the wind
16	changes and it heats up in the day and you have to
17	sample over sufficient period of time to get enough
18	sample, you know, to get enough material in that
19	absorbent that you can analyze. We're going to be
20	pushing the limit.
21	MR. BREWER: The thing, in summary, the
22	goal of this study is to assess JP-8 fueling operations,
23	current JP-8 fueling operations, the impact on North
24	Kelly Gardens. It's complicated by high background, as
25	we've been discussing, and then we have to assure

1 ourselves that our measured values will be distinguished 2 from that background. 3 A good example is the background we 4 measured at Southwest Research doing the method 5 development studies was around ten micrograms per cubic meter. The ESL for benzene is three. So what that says 6 7 is you've to be able to statistically say that ten is 8 different from three, and that's the problem we're up 9 against. 10 UNIDENTIFIED MALE: What other conditions 11 will effect the weather conditions themselves? Do you 12 have a sliding scale also for barometric pressure or do 13 you have consideration for barometric pressures? 14 MR. BREWER: As far as calculating the 15 risk, I'm not familiar with the calculation techniques. 16 As far as the environmental parameters we're sampling, 17 we're going to look at relative humidity, barometric 18 pressure on the hour. I think barometric pressure is 19 reported every 15 seconds and the average is given to you whoever you want it. 20 21 Relative humidity, we're going to have to 22 measure manually, but yes, it will be recorded, and if 23 it's called for in the risk calculations, then we'll 24 certainly use it. 25 UNIDENTIFIED MALE: Two questions.

KELLY AR # 3401.1 Page 58 of 121

1 You're going to do this worse case scenario of actually 2 pumping gas or JP-4. Will you simulate a spill? 3 What we're going to simulate MR. BREWER: 4 is the normal operating conditions at system 1592. 5 UNIDENTIFIED MALE: You know, it seems to 6 me that worse case would incorporate some kind of a 7 spill, since spills occur. 8 MR. BREWER: We're looking at the 9 operating system at 1592, and although you may have 10 spills, that would qualify as an emergency situation, 11 and I would think that if you did have a spill, the 12 response would be immediate to recover from that 13 situation, and there's really no way to go in and 14 purposely determine what a spill is going to do. 15 UNIDENTIFIED MALE: I quess then we're 16 really not talking about a worse case but we're talking 17 about a worse case when accidents don't occur? 18 MR. BREWER: No, I said worse case 19 operating conditions, operating. 20 UNIDENTIFIED MALE: Yes. 21 UNIDENTIFIED MALE: Basically this is, 22 when you do a health risk assessment, then is an 23 emergency or an accident situation, you're basically 24 trying to look at is there a potential that the 25 operation would have an impact on the community and

> FEDERAL COURT REPORTERS OF SAN ANTONIO, INC. 10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

57

KELLY AR # 3401.1 Page 59 of 121 58

based on the emissions. So obviously that's a 1 calculation of what you do. You take the situation and 2 be able to predict over a long period of time whether or 3 4 not you accumulate it. Yes, sir? 5 UNIDENTIFIED MALE: UNIDENTIFIED MALE: I think I understand 6 most of what you said, talking about a specific facility 7 and its potential impact. There must be some reason why 8 we're even looking into it. Have there been complaints 9 or has there been some demonstrated -- because that's 10 11 what I don't -- that drives the need to do this? Regardless of where the source is, there's a problem. 12 MR. BREWER: What I tried to emphasize, 13 and hopefully I did, is we're going to look at current 14 conditions, normal operating conditions associated to 15 JP-8 or effects relative to JP-8, which the release 16 rates and the model concentration, and the whole 17 assessment can be backed up to look at JP-4, whatever 18 you'd like to look at, but you're going to have to use 19 20 historical data to do that. UNIDENTIFIED MALE: Will the residents be 21 notified some days of ahead of when the sampling will be 22 23 done? MR. BREWER: Well, there's actually going 24 to be two events. We're going to do the fugitive study 25

KELLY AR # 3401.1 Page 60 of 121 59

with system 1592 first, and that will probably be 1 conducted along Berman Road outside of the property 2 boundary. We'll have a facility there. And then I'm 3 estimating a couple of weeks and then we would be in the 4 5 neighborhood. UNIDENTIFIED MALE: Uh-huh. 6 7 MR. BREWER: So I would probably look to our client to notify the residents. 8 UNIDENTIFIED MALE: Will you plan on 9 doing that, Larry, notifying the residents? 10 UNIDENTIFIED MALE: Absolutely, just like 11 we done the soil sampling and the other thing. You bet 12 13 you. UNIDENTIFIED MALE: And my last question 14 15 is how much will this cost? MR. BREWER: Ask the people who pay the 16 bill. 17 UNIDENTIFIED MALE: It costs a lot of 18 19 money. UNIDENTIFIED MALE: Do you have a rough 20 21 idea? 22 UNIDENTIFIED MALE: We can get you a 23 range. UNIDENTIFIED MALE: Could you have an 24 25 estimate at the next RAB meeting?

KELLY AR # 3401.1 Page 61 of 121 60

1	UNIDENTIFIED MALE: Sure.
2	UNIDENTIFIED MALE: Thank you.
3	UNIDENTIFIED MALE: I'll give you a range
4	of what we're doing, because it could be this, it could
5	be that. But I think that's an important point, and
6	it's an important point to, while the people in the
7	community, some of whom, you know, obviously are saying
8	that the problems are coming from Kelly, you know, the
9	studies that are being conducted now are very thorough.
10	There's more than just a party who's looking at them.
11	There's Southwest Research and others. I think that's
12	important. We're going to start to make sure that the
13	information that we get out to the community, that they
14	understand that there are multiple parties that are
15	looking at this.
16	We're not going into the cost with
17	specific members of the community unless asked because
18	then we'll give them a range. The key is there are
19	people out there that have said we have definite health
20	problems and we think that some of them are, in fact,
21	being caused by Kelly Air Force Base.
22	So once again, the soil back to your
23	question, sir the soil sampling was directed at that
24	concern. The air sampling is also directed that
25	concern.

KELLY AR # 3401.1 Page 62 of 121

1	UNIDENTIFIED MALE: Okay, thanks.
2	MR. BREWER: One thing I would like to
3	interject is there is a test plan that will be finalized
4	before we do the sampling, which will probably explain
5	things in much greater detail than I did.
6	UNIDENTIFIED MALE: Will we have access,
7	will we be able to look at the test plan beforehand?
8	UNIDENTIFIED MALE: We'll do it the same
9	that we did the soil sampling, by going out and talking
10	about the points and
11	UNIDENTIFIED MALE: Yes, that was very
12	well done, when we sat down and looked at the sampling
13	points, yes, that's a great model to use.
14	Thanks, that was a great presentation,
15	Joe.
16	UNIDENTIFIED MALE: Pardon me, if I could
17	make a quick comment.
18	UNIDENTIFIED MALE: Yes.
19	UNIDENTIFIED MALE: Since their
20	presentation is complete, I'm not saying that you have
21	to leave, but if you want to leave
22	UNIDENTIFIED MALE: Or you can stick
23	around.
24	UNIDENTIFIED MALE: Can we just have a
25	break for about five minutes?

FEDERAL COURT REPORTERS OF SAN ANTONIO, INC. 10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

61

KELLY AR # 3401.1 Page 63 of 121

UNIDENTIFIED MALE: I was going to ask, 1 folks, if they prefer, we have an hour and a half and 2 3 we've done two out of three. It looks like people are 4 voting for a break. UNIDENTIFIED FEMALE: Five minutes. 5 UNIDENTIFIED MALE: Yes. 6 7 (Break taken.) UNIDENTIFIED MALE: Okay, let's get 8 9 started. SAIC is going to talk about plans for cleaning 10 up Zone 3, in particular, Quintana Road neighborhood, and I'm very happy to see the SAIC folks here because 11 12 this is a meeting we've been asking for for going on a year now and I'm glad it is final here. So thank you 13 14 and turn it over to Bob. UNIDENTIFIED MALE: Everybody should have 15 the hand-out that I'm basically going to go through page 16 17 by page. With respect to drawings, I'm going to utilize, because of the graphics that's available here 18 locally, I'm going to utilize that particular drawing 19 20 over there to show and locate where it is the areas that 21 I've been speaking in terms of. 22 What I'm proposing to do is obviously address and present those areas or those locations that 23 24 were proposed and accepted as the RODS for the ground 25 water remediation systems in Zone 3, and so what we are,

KELLY AR # 3401.1 Page 64 of 121

in fact, doing is obviously following that particular 1 And then I'd like to give you a current update or 2 ROD. a status of where we stand currently with respect to the 3 initiation of working into the installation of those 4 5 particular systems. UNIDENTIFIED MALE: I'm going to ask a 6 7 What is a ROD? question about the acronym. Record of Decision. 8 UNIDENTIFIED MALE: UNIDENTIFIED MALE: Okav. 9 In other words, it's UNIDENTIFIED MALE: 10 gone through the process of being regulatory approved. 11 UNIDENTIFIED MALE: I just didn't know 12 Thank you. 13 what a ROD was. UNIDENTIFIED MALE: All right. And at 14 the end -- yes, I'm going to utilize this. That's the 15 Zone 3 graphics and so that's the area that we're 16 17 talking about. What I have here as well, for purposes of 18 being able to demonstrate, this is the particular 19 drawing or the graphic that's come out of the actual 20 normal document that says these are the preferred 21 alternatives and this is what has been accepted as far 22 as the ROD. So I want to use this. Obviously that's 23 not what's on that particular drawing but what we've got 24 25 here is obviously the site.

KELLY AR # 3401.1 Page 65 of 121 64

1	With respect to that particular document
2	and the ROD, these are the particular locations that
3	were identified within Zone 3 for remediation.
4	With respect to this particular drawing
5	over here, this site here is MP. It's the solid plating
6	facility at the Berman Road/Tinker Road intersection.
7	If you were to take Tinker straight down into Berman
8	Road, what is left of the vacant lot or parking area, to
9	the left as you get to Berman Road, site S-8, if you
10	were to go down to the same location and turn to the
11	right, you come to what was known as one time as the
12	(Inaudible) facility, and that's known as S-8. S-4 was
13	the location of where, in fact, fuel was encountered
14	during the process of the city's excavation of a storm
15	sewer system down in the Quintana Road area.
16	In the process of activation, fuel filled
17	that area, and as a result, there was a particular fuel
18	plume that they had to deal with as far as cleaning it
19	up.
20	The other location is site S-6, which is
21	up in this particular area, you know, proposed park in
22	the center of the maintenance complex of the base. And
23	those are the principle areas.
24	And then with respect to the preferred
25	alternative, as you would look at it, there's another
	EEDEDAL COUDE DEDODEEDS OF SAN ANTONIO INC

KELLY AR # 3401.1 Page 66 of 121

proposed, for lack of a better term, I didn't know what 1 else to call it other than Union Pacific Railroad 2 3 Recovery System. Within that particular plan, it was 4 presented that there would be a capture system installed 5 to address this particular plume area out in this 6 particular area, just outside near the railroad plume, 7 8 the UPRR location. UNIDENTIFIED MALE: Bob, I want to say 9 10 something. UNIDENTIFIED MALE: Yes, sir. 11 UNIDENTIFIED MALE: I don't want to, you 12 know, discourage you from talking about any of this 13 stuff you had planned talking about, but those of us who 14 requested this, we were almost entirely interested in 15 the Quintana Road neighborhood area. Now certainly if 16 people are interested in other things, you know, talk 17 about it, but it might make things go faster, if it's 18 agreeable to you and everyone else here, to essentially 19 20 focus on Quintana Road. UNIDENTIFIED MALE: I think you would be 21 cheating yourselves. As the RAB, you have a job, and 22 that is to look at the remedial systems that are being 23 planned or look at the contaminants that we're trying to 24 address here and then evaluate the remedial systems that 25

KELLY AR # 3401.1 Page 67 of 121 66

1	are available and help provide the input to the
2	process. That regards to the whole base, no focus
3	areas, not spot spots necessarily, all the remedial
4	systems, and tonight we're focusing on Zone 3.
5	UNIDENTIFIED MALE: Yes, what we're doing
6	is focusing specific to Zone 3. That's what we were
7	asked to present and that's what we are, in fact,
8	presenting.
9	UNIDENTIFIED MALE: Okay.
10	UNIDENTIFIED MALE: Now about Quintana
11	Road, you're talking about the UPRR areas?
12	UNIDENTIFIED MALE: Where are you
13	addressing? Are you addressing down here?
14	UNIDENTIFIED MALE: Yes. It's
15	essentially the contaminant plume in the neighborhood
16	that extends something like so.
17	UNIDENTIFIED MALE: Okay.
18	UNIDENTIFIED MALE: Yes, we, in fact, are
19	not proposing to discuss anything with that particular
20	area, other than the fact that what we're dealing with
21	is the preferred alternative is basically this
22	particular system that was installed out here. As a
23	part of our tasking, we're optimizing that particular
24	system to allow that system to work efficiently or more
25	efficiently than what it currently is, but as far as

Г

KELLY AR # 3401.1 Page 68 of 121

1 doing anything to address the plume out in here, we, as 2 a part of our tasking, are not dealing with that. 3 UNIDENTIFIED MALE: Well, I quess there's 4 some crossed wires here. Our request went through the 5 Air Force and to you and it didn't get transmitted the 6 way I hoped it would. UNIDENTIFIED MALE: 7 We'll address that to 8 some degree, so we'll get to that, unfortunately in our 9 last site, but we will get to it. 10 UNIDENTIFIED MALE: We're going to 11 address what we're proposing to do in that particular 12 area, I'll tell you that. 13 UNIDENTIFIED MALE: Is there another 14 contractor then that's working on designing clean-up 15 system for the neighborhood itself? 16 UNIDENTIFIED MALE: I can't speak to that 17 exactly. I know that we are not. I know that this 18 particular plume here is being handled through a 19 particular effort that's associated to Zone 4 activity. 20 UNIDENTIFIED MALE: Okay. Well, I don't 21 want to hang you up any more. 22 UNIDENTIFIED MALE: So really to get into 23 what we're talking about, with respect to cite MP, as we 24 have indicated, that's the plating facility that used to 25 be located in here, of which this particular plume is

KELLY AR # 3401.1 Page 69 of 121 68

1	basically associated.
2	The general approach that we're following
3	is we have, where, in fact, possible, we are looking to
4	utilize the design vehicle as a means of actually the
5	installing the remedial action so that we aren't just
6	designing something that, in turn, somebody at a later
7	date will go out to a point of actually constructing, so
8	that's the intent that we're following with respect to
9	how we're proposing to do all the site work.
10	The other is we're applying, for the most
11	part, the same technology that was approved within the
12	ROD.
13	The other is we're looking to integrate
14	obviously the soils with ground water. In other words,
15	we aren't looking to install a system that's specific to
16	either/or. We're looking to ensure that we've got a
17	system that's totally compatible from a source
18	mitigation as well as a ground water mitigation system.
19	And other is, in fact, we're looking to optimize the
20	existing systems that are already there without going
21	back and necessarily rebuilding those systems.
22	UNIDENTIFIED FEMALE: I'm sorry, when you
23	said same technology, is that the pumping it out and
24	cleaning it up?
25	UNIDENTIFIED MALE: Yes, yes, ma'am.

1	UNIDENTIFIED MALE: Now a couple of
2	things that we're doing here can have some effects.
3	First of all, especially with combining remedial
4	designing with remedial action and also with the
5	optimization perhaps, and the integrated system, though,
6	three things are, first of all, cutting down
7	significantly the time that takes to get the systems
8	accomplished and completed significantly, especially
9	combining (Inaudible) design with remedial action.
10	Secondly, it's also providing the maximum
11	efficiency you can. And I'm use the term design/build.
12	UNIDENTIFIED MALE: I was going to say
13	design/build.
14	UNIDENTIFIED MALE: We all know
15	design/build is the most efficient way of doing it. Now
16	sometimes you have to be careful with the government
17	because you have to be careful with the design/build,
18	but in this case, we're proposing that because certainly
19	things have changed in the last three years when the,
20	three to five years, when the feasibility studies were
21	done, societies conditions have changed, plumes have
22	moved, et cetera, so by doing our testing here for the
23	remedial design and then we come right in, boom, and as
24	a part of design action and the optimization actions
25	that we're doing, the final system gets put in place,

KELLY AR # 3401.1 Page 71 of 121 70

you have absolutely put in the best system at that time 1 and you have also cut the amount of time it takes to get 2 3 the system in. And also, I'm not going to bet my life on 4 5 it right now but I'm almost do that, in terms of by 6 optimizing, we're going to be cutting down quite a bit 7 the number of years it takes to clean up the plume. And there's a lot of details in that that we don't have time 8 to go into now but we probably will down the road in 9 terms of how this optimizing will definitely, as we do 10 the modeling that you'll see here, will show how we're 11 talking about significantly reducing the time. 12 UNIDENTIFIED FEMALE: Did you re-do the 13 14 modeling? We will be 15 UNIDENTIFIED MALE: No. 16 re-doing it. 17 UNIDENTIFIED MALE: Do you have an 18 estimate of clean-up time now? No, we don't. That's 19 UNIDENTIFIED MALE: 20 what we'll be doing as part of this effort for each 21 site. UNIDENTIFIED MALE: And with respect to 22 23 MP, which is the old plating facility, we are in the 24 process currently and currently under schedule that as 25 of the 21th of this month, I don't know if there's been

KELLY AR # 3401.1 Page 72 of 121 71

]	
1	some kind of release, but we'll be installing what could
2	be the first of one or two wells. At this point, we
3	don't know exactly how many, within the site of MP.
4	The previous system, the interim system
5	that was put in there to address this particular plume
6	that is migrated off the base was a system installed for
7	a problem that was being experienced at the time. They
8	wanted to initiate an action to prevent this particular
9	situation from getting any worse so there was basically
10	a system of five recovery wells that were installed
11	along Berman Road along the base boundary line. That
12	particular system has been operating for approximately
13	two years.
14	What we're proposing to do as a result of
15	the BRA, I'm not the Basewide Remediation Assessment
16	that's been being done now for the last three years
17	we have been looking at that particular data. This
18	particular design or the interaction was designed back
19	in '92, '93, based on much different data that what, in
20	fact, is available to us to date.
21	UNIDENTIFIED FEMALE: Do you think it
22	worked? I mean, was it successful?
23	UNIDENTIFIED MALE: Yes. The system,
24	from a containment standpoint, it obviously is doing
25	nothing with respect to the plume that's already gone
1	beyond the boundary.
----	--
2	UNIDENTIFIED FEMALE: Right, right.
3	UNIDENTIFIED MALE: But with respect to
4	containing the plume and what we've been able to
5	identify, actually the source, of which this system was
6	never intended nor was it intended as part of the
7	preferred alternative to do anything with the source
8	because it wasn't assumed that there was one, we have
9	identified within there's a dissolved plume that
10	exists within the MP facility or within that particular
11	area that probably has the highest concentrations of TC
12	and PC that's located on the base but that's not going
13	anywhere.
14	Over the last three years, that
15	particular source has remained within this particular
16	boundary. What we're proposing to do is rather than
17	just stay with a containment system, evolve that system
18	into a source mitigation system, basically making it
19	more of a capture source removal system than what it
20	currently has been set up for.
21	UNIDENTIFIED MALE: Bob, based on the
22	data that you've seen, do you think that source is still
23	being produced or is it just a remnant of an event that
24	occurred in the past?
25	UNIDENTIFIED MALE: All we can see

Γ

KELLY AR # 3401.1 Page 74 of 121 73

1	That particular question, we can't totally answer that
2	but there certainly is a ground water plume that's not
3	moving that is, in fact, located in what was the
4	location of what the building used to exist in. I can't
5	sit there and say that there is, in fact We've done
6	and the base has done some particular soil sampling to
7	this area and there's not been any kind of indication
8	within the soils that there's any kind of contamination
9	process. So whatever is present, it would have to be
10	sub-surface.
11	There's the possibility that this
12	particular source material is as a result of the
13	industrial waste collection system that used to exist in
14	that particular area, but the system, there's a
15	concentration of chlorinated solvents that, in fact, has
16	not moved in a three year period of time. So in order
17	obviously to address the problem to mitigate the source,
18	you have to attack it, and that's what we're proposing
19	to do, and in that particular first recovery well, we're
20	calling it right now a test well but we, by our design,
21	are setting up our wells in such a way that they will
22	become a part of final system.
23	The first of those wells will go in next
24	week, and that will be installed in what we have
25	identified to be the source area, and that's what we're

Γ

KELLY AR # 3401.1 Page 75 of 121 

basically talking about with respect to pump testing. UNIDENTIFIED MALE: That's a key element of what we talked about integrating remedial design with remedial action, in that we need to determine --(Tape cut off. End of Tape 1.) FEDERAL COURT REPORTERS OF SAN ANTONIO, INC. 10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

1	(Beginning of Tape 2.)
2	UNIDENTIFIED MALE: What is the primary
3	purpose of the pump test? I understand you're going to
4	later look at hydraulic characteristics. Then what are
5	you going to do with it?
6	UNIDENTIFIED MALE: We're going to verify
7	that we can, in fact, capture from that one well the
8	source. That's the whole purpose of that particular
9	pump test. We want to determine what, in fact, the
10	radio influence of that particular well to ensure that
11	we have complete capture of that source area.
12	So the other thing is, and we'll go into
13	this. In fact, we'll evolve into it. As you can see
14	from a proximity standpoint, S-8 is very close in
15	proximity to this location. You can't eliminate what it
16	is that's being done here that's not going to have an
17	effect on this particular system. These two systems
18	have to be integrated.
19	When the systems were initially put in
20	and installed, they were put in separately, apart from
21	one another. Input information was basically from this
22	area that allowed the model to be developed to put in
23	that particular system. This system was put in, I
24	believe S-8 was put in sometime around in '92. This
25	system here was in '94, so there's a couple years apart
L	

within that system. This is back in the '90 to '91 time 1 frame with respect to S-4. So those were put in with 2 3 respect to information that was available. The BRA data, which is basically a data 4 5 that's capturing far more wide-reaching areas for other than specific to the sites, didn't begin until about 6 1994 and it's gone on each year. So there wasn't any 7 kind of larger picture information available so the BRA 8 information was, in fact, for that particular task began 9 10 back in '94. So with respect to the wells that we have 11 been installing in the source area, it has a very good 12 potential, just because of the thickness of water that's 13 within this particular area that could, in fact, 14 influence the operation of this particular system here. 15 16 So what we have to do, in the process of putting together this design is we integrate obviously this 17 18 system into this system from a ground water standpoint. 19 UNIDENTIFIED MALE: We have the official 20 aquifer and then we've got the Navarro underlying that. 21 Yes. UNIDENTIFIED MALE: 2.2 Are you only looking UNIDENTIFIED MALE: 23 at the contaminants in this official aquifer or are you doing anything with the Navarro? 24 25 UNIDENTIFIED MALE: We've gone and mapped

KELLY AR # 3401.1 Page 78 of 121 77

1	the Navarro. We have done and will be doing, when we
2	talk about, that's the next step that's being proposed
З	that we're going to be doing.
4	Contamination, and as pretty well
5	indicated by this particular drawing as well, you know,
6	contamination is basically a tracer. That's a tracer of
7	channels. In other words, contamination is going to
8	move through channels. What was not ever really
9	identified in the paths was where exactly are those
10	channels to ensure that the systems that have been
11	installed are located in the best place possible to
12	capture that contamination.
13	UNIDENTIFIED MALE: I was going to say
14	something a little bit different, and that was generally
15	the Navarro was thought to be almost impermeable.
16	UNIDENTIFIED MALE: Yes.
17	UNIDENTIFIED MALE: However, in some
18	places, it is quite permeable. So are you looking at
19	UNIDENTIFIED MALE: We're looking at the
20	Navarro at being the bottom of the shallow water. We're
21	not going below that. That's the extent of it.
22	UNIDENTIFIED MALE: So do you believe
23	that the Navarro is not contaminated or that there's no
24	possibility of the Navarro being contaminated?
25	UNIDENTIFIED MALE: You mean

KELLY AR # 3401.1 Page 79 of 121

1 contamination as migrated below that particular --2 UNIDENTIFIED MALE: The Navarro from this 3 official aquifer? UNIDENTIFIED MALE: No, we do not believe 4 5 that and we don't see that there's necessarily any 6 information that dictates that that is the case. 7 There's another project that's ongoing that will be 8 starting to potentially further address that 9 possibility. UNIDENTIFIED MALE: Do you have data that 10 11 shows you that, in fact, the Navarro is not 12 contaminated? Do you have data that show that? 13 UNIDENTIFIED MALE: No. 14 UNIDENTIFIED FEMALE: That's an 15 assumption. 16 UNIDENTIFIED MALE: No, that's an assumption. It's based off of this information that's 17 18 currently available. 19 UNIDENTIFIED MALE: Yes. 20 UNIDENTIFIED MALE: Okay. Now from a 21 standpoint of our systems, obviously we're addressing 2.2 these systems with respect to the clean-up of the 23 shallow or superficial aquifer. UNIDENTIFIED MALE: And that's all we'll 24 25 be talking about today?

KELLY AR # 3401.1 Page 80 of 121

1	UNIDENTIFIED MALE: Yes.
2	UNIDENTIFIED FEMALE: Is there any
3	(Inaudible)? I just kept calling it the shallow
4	aquifer.
5	UNIDENTIFIED MALE: That's all we know it
6	as.
7	UNIDENTIFIED MALE: Could I just bring
8	that up as a point for future consideration? In some
9	places, Air Force data shows that the Navarro is more
10	conductive, has hydroconductivity several orders of
11	magnitude than some portions of this official aquifer,
12	so I don't know that we can get completely away from the
13	assumption that we don't have to think of contamination
14	in the Navarro. I think we may have to think about it.
15	Right now, it's an unknown.
16	UNIDENTIFIED FEMALE: Given the risks
17	associated with the (Inaudible), it's pretty serious.
18	UNIDENTIFIED MALE: Yes, the problem is
19	that the Navarro, there's no barrier to flow between the
20	Navarro and this official aquifer, so what you can have
21	happen is contaminants flowing in this official aquifer,
22	then if the Navarro happens to be more conductive at a
23	certain point, flow into the Navarro and then move back
24	into this official aquifer.
25	UNIDENTIFIED MALE: Okay. So that's what

FEDERAL COURT REPORTERS OF SAN ANTONIO, INC. 10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

79

I was wondering. You're talking about the Navarro as a 1 2 source agency? UNIDENTIFIED MALE: Pardon me? 3 UNIDENTIFIED MALE: You're talking about 4 the Navarro as a sourcing agent? In other words, it 5 6 becomes contaminated and then resources? 7 UNIDENTIFIED MALE: That's one 8 possibility, yes, that's one possibility. UNIDENTIFIED MALE: But I was thinking 9 you were talking about actually breaks in the Navarro 10 and going down into the Edwards. 11 UNIDENTIFIED MALE: No, I'm not referring 12 to that. I'm just referring to the aquifer portion of 13 the Navarro now, but that's another issue and that's for 14 15 another day. UNIDENTIFIED MALE: Okay, we'll check 16 into that. We'll have our hydrogeologist address that 17 and look at that. I haven't heard that come up before. 18 UNIDENTIFIED FEMALE: You know, your 19 20 clean-up --21 UNIDENTIFIED MALE: As far as, yes, 22 there's not been much information that I'm aware of anyway that shows the Navarro as being a sourcing agent. 23 UNIDENTIFIED MALE: Yes, I have actually 24 25 looked for water quality data on the Navarro.

KELLY AR # 3401.1 Page 82 of 121 81

1	UNIDENTIFIED MALE: Okay.
2	UNIDENTIFIED MALE: And I haven't found
3	any. I've found aquifer testing done on the Navarro but
4	no water quality data for it. It probably exists
5	somewhere, I just don't have it in my 40 pounds of
6	stuff.
7	UNIDENTIFIED MALE: We'll check into
8	that.
9	UNIDENTIFIED MALE: So obviously a part
10	of our tasks, and again, when we talk channel
11	delineation, and that's being done in basically two
12	forms of geophysical techniques.
13	The size posts, which some of you may be
14	familiar with, was already conducted, and that work was
15	done this past fall.
16	It was found to be very good with respect
17	to delineating the particular, the surface of the
18	Navarro, but it was found not to be very well it
19	doesn't do very well with respect to characterizing
20	lithology nor determining whether or not gravels are, in
21	fact, present.
22	Obviously with respect to any kind of a
23	channel, there's got to be some kind of gravels present
24	to allow water to be existing. You can find a low lying
25	area within the Navarro but if you don't have some form
•	

KELLY AR # 3401.1 Page 83 of 121 82

1 of gravel present, then you're not going to have 2 potentially any kind of mobility within the water 3 flowing through that particular area. You have to have 4 a channel. 5 UNIDENTIFIED MALE: I completely disagree 6 with that. In order to get ground water moving, you 7 need a translucent medium and a difference in hydraulic 8 heads. 9 UNIDENTIFIED MALE: But also translucent 10 medium, it's generally some form of permeable material, 11 whether we want to call it gravel or whatever you want 12 to call it. 13 UNIDENTIFIED MALE: What he's talking 14 about is you'll get the greatest flow and you'll get the 15 largest flow in these graveled areas. 16 UNIDENTIFIED MALE: I don't have a 17 problem with that, but where you have ground water and 18 where you have difference in heads, you have to show --19 UNIDENTIFIED MALE: Absolutely. 20 UNIDENTIFIED MALE: Absolutely. 21 UNIDENTIFIED MALE: We're just talking 22 about the gravels of where we're going to optimize our 23 systems, that's what we're looking for. 24 UNIDENTIFIED MALE: And that's the point 25 behind the geophysical work that's being done, because

KELLY AR # 3401.1 Page 84 of 121 83

1	we obviously want to ensure that the current systems
2	that have been installed are in the most optimum
3	locations possible, so that's part of trying to identify
4	where the channels are to ensure that those wells are
5	located in the best suitable locations for purposes of
6	capturing that particular contaminant plume to ensure
7	that, in fact, it's not going to do anything with
8	respect to the plume.
9	It, in fact, has gone beyond the base but
10	it certainly is going to prevent any future movement of
11	any contaminant plume beyond the base boundary.
12	The next is with respect to the existing
13	systems, there's never been, to date, any kind of an
14	actual physical test of those existing systems. There's
15	been some capture modeling that's been being done but
16	that's based off of actual, basically information that's
17	available from sampling that's done, water level
18	information that's captured as a result of BRA. There's
19	not been any kind of physical pump testing of those
20	existing systems, so what we're going to do as a part of
21	this, we'll be pump testing each of those particular
22	wells within the containment system, so the five MP
23	wells will be tested to determine exactly what it is
24	currently that's available within that system. And then
25	at that point, that will begin, we'll plug that into our

E

KELLY AR # 3401.1 Page 85 of 121 84

1 model with respect to the information we obtain from the 2 capture system as it currently stands, and from what we 3 determine to be the need from the source mitigation 4 system, we will develop a containment system that will, 5 in fact, address this particular MP site. 6 And at the same time, when we indicated 7 we were proposing to do this in a design/build concept, 8 once, in fact, the wells are in place, we would at that point come back and install the infrastructure which 9 10 supports those particular wells. 11 By infrastructure, I'm speaking of 12 obviously all the piping network that's required to take 13 that particular ground water down to a treatment 14 facility on base. So we, as a one process type integration, once we develop the particular system, we 15 16 will, in fact, install the piping system that's required 17 to move that ground water down to the plant. 18 UNIDENTIFIED FEMALE: Now is your system 19 going to be limited in any way by the capacity of that 20 treatment center, the power treatment plant? 21 UNIDENTIFIED MALE: The power treatment 22 plant? 23 UNIDENTIFIED FEMALE: Yes. 24 UNIDENTIFIED MALE: No, because that 25 particular ground water treatment plant will be upgraded FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

KELLY AR # 3401.1 Page 86 of 121

to the point that it will receive whatever the ground 1 2 water is that we have determined the need for. 3 UNIDENTIFIED FEMALE: Okav. UNIDENTIFIED MALE: And they're in the 4 process of doing that as well. There was a draft plan 5 designed that was provided to the base for upgrade and 6 7 integration of those systems. The ground water treatment plant right 8 now is currently technically two individual systems. 9 Zone 3 comes into one side of the plant, Zones 1 and 2 10 11 comes into the other. They operate as independent systems. We have provided to them a design package that 12 would allow that particular system to integrate itself 13 so that they have the ability of surging from different 14 15 systems, from Zone 1, Zone 2 and Zone 3, and accommodating that particular surge, and they're in the 16 process of upgrading or moving to the upgrade of that 17 18 facility. 19 Some people are UNIDENTIFIED MALE: concerned that this pumping might cause subsidence and 20 21 damage to their homes. Have you done any studies to look into that? 22 23 UNIDENTIFIED MALE: No, we're not doing 24 that, no. But the whole point is we're not de-watering 25 for the sake of, you know, we're not just massively

KELLY AR # 3401.1 Page 87 of 121 86

1	drawing water. I think there may be a misconception
2	that we're just pumping, you know, as much water as can
3	be pumped. That's not what you do for purposes of
4	establishing a capture system. You pump enough water
5	that your cone and depression is basically capturing the
6	particular flow that's coming into it. So we're not, by
7	any means, de-watering the particular system. That has
8	never been the intent and nor is it going to become the
9	intent of the systems.
10	UNIDENTIFIED MALE: You want to be sure
11	not to pump clean water.
12	UNIDENTIFIED MALE: That's the other
13	point too. That's why it is you want to optimize the
14	locations of the well, so that you are, in fact,
15	reducing that particular issue, that you're not pumping
16	a lot of clean water that you're having to process and
17	treat, which is fairly costly.
18	And then the last thing that we would do
19	is once everything is in place, we would do an actual
20	test of the system to ensure that, in fact, it's doing
21	what it was it was modeled and intended to do, which is
22	something that has not been done as well before. So
23	we're going to verify what it is that's in place is
24	working and is working the way it was designed to work.
25	And with respect to site S-8, again, the

Γ

KELLY AR # 3401.1 Page 88 of 121 87

1 same thing. As I had already mentioned once before, S-8 2 merges into or has got to be integrated into the design 3 of MP, so from a ground water standpoint, it's going to 4 be evaluated along with MP. 5 As we conduct our particular tests 6 associated in the installation of the recovery wells at 7 MP, as well as with respect to the system that currently 8 is working within those MP wells, we're going to be 9 doing the same type of pump testing of the existing 10 system. 11 It's our belief that right now there's a 12 lot of wells that currently have been installed as a 13 part of S-8 that aren't necessarily required for 14 purposes of maintaining the capture system that we need 15 to have with respect to (Inaudible). Some of those 16 wells are currently located on railroad property. 17 Just for purposes of O and M and 18 maintenance, long term maintenance, it's much better if, 19 in fact, you can develop a system that's going to, in 20 fact, provide you the same recovery, same capture with 21 lesser wells that you have to deal with and service over 22 time. So we believe that, in fact, is what's going to 23 be the case, so that's part of our optimization. 24 We're going to go in and determine what, 25 in fact, is actually needed with respect to the

KELLY AR # 3401.1 Page 89 of 121

installation of the wells that we're going to be putting 1 in here, and with respect to these wells operating, 2 what, in fact, is still required to be operating here to 3 address containing that particular plume that's 4 5 associated with S-8. Now along with S-8 --6 UNIDENTIFIED MALE: I'm sorry, but not 7 only contain it but the optimization will speed up the 8 recovery of the plume, not just passing containment but 9 10 also we want to optimize these wells. In the past, the wells have not been 11 optimized for a lot of different reasons and what we're 12 going to be doing is we'll be optimizing screen size and 13 things like that. The screen sizes in the past have 14 been like size ten. We're finding that screen size of 15 about 80 or even a hundred, and so therefore you can 16 imagine that we're going to be maximizing flow quite a 17 bit, a lot more flow, and that's going to help us clean 18 things up a lot faster. 19 So where models in the past have used 20 data correctly but it's old data, we're going to be 21 optimizing things and the flows are going to be greater, 22 and that's why we predict that when we finish here, the 23 models are going to tell us, you know, where it said 30 24 years before, maybe we're down to 15 or whatever, we're 25

fully anticipating that. 1 UNIDENTIFIED MALE: As you optimize, you 2 have to take into account other wells that are pumping 3 4 in the area. UNIDENTIFIED MALE: That's exactly 5 6 correct. And presumably there UNIDENTIFIED MALE: 7 are going to be other wells out in the neighborhood 8 working to clean up the contaminated plume in the 9 neighborhood. So that's why I'm a little bit surprised 10 that you all not only aren't planning on doing it but 11 you don't know who it is you're going to have to work 12 with in order to optimize your system. 13 UNIDENTIFIED MALE: No, there's a 14 When you say neighborhood, there's work that's 15 system. going on out here. I'm just saying we're not doing 16 that. I know that CH2M Hill is doing that. 17 UNIDENTIFIED MALE: CH2M Hill is doing 18 19 that? UNIDENTIFIED MALE: Yes, with respect to 20 the Zone 4 activities, CH2M Hill is working with respect 21 to the plume that, in fact, has gone beyond the base. 22 UNIDENTIFIED MALE: And would they be 23 doing it down in the Quintana Road neighborhood as well? 24 I can't answer that. UNTDENTIFIED MALE: 25

90

1 I'm not sure. Do you know, Mike? 2 UNIDENTIFIED MALE: UNIDENTIFIED MALE: No, I don't. I mean, 3 I assume so but I don't know. 4 5 UNIDENTIFIED MALE: Okay. UNIDENTIFIED FEMALE: (Inaudible). 6 7 UNIDENTIFIED MALE: Have we done briefing, no, no. We have provided the information. 8 Now whether the folks with the (Inaudible), I can't 9 speak to that. We specifically haven't. 10 UNIDENTIFIED FEMALE: Who else would be 11 12 likely to do it, you said? UNIDENTIFIED MALE: The EMRO staff? 13 UNIDENTIFIED FEMALE: Oh, okay. 14 UNIDENTIFIED MALE: The Kelly staff. I 15 don't know what they have given to those folks. 16 UNIDENTIFIED FEMALE: You think there's 17 18 any (Inaudible)? UNIDENTIFIED MALE: You're speaking in 19 20 terms of the storm sewer project? UNIDENTIFIED FEMALE: Uh-huh. 21 2.2 UNIDENTIFIED MALE: I don't think so. Ι 23 think that from a hazard standpoint, I believe the hazards have been identified with respect to its 24 potential and with respect to the construction of that 25

KELLY AR # 3401.1 Page 92 of 121 91

1 particular site. Is that what you're concerned about? 2 UNIDENTIFIED FEMALE: Yes, that that 3 might mess with what you all are doing. 4 UNIDENTIFIED MALE: No, no. We're 5 talking about a system that is really -- that particular system is going to run through here and through here. 6 7 That's the storm sewer system you're speaking of. 8 UNIDENTIFIED FEMALE: Uh-huh. 9 UNIDENTIFIED MALE: And right now, this 10 is the actual product plume. That's what this was drawn 11 by. UNIDENTIFIED FEMALE: Uh-huh. 12 13 UNIDENTIFIED MALE: The dissolved portion 14 of that plume, as I understand it, is really in the area 15 of this particular site, but at much lower levels than 16 what presents itself as any kind of hazard, as I 17 understand it, but precautions, as I understand it, as 18 well with respect to the city, I can't speak to exactly 19 where the (Inaudible). 20 UNIDENTIFIED FEMALE: Maybe I used the 21 wrong word but what I meant was --UNIDENTIFIED MALE: Interfere with us? 22 23 UNIDENTIFIED FEMALE: Yes, interfere with 24 what you all were doing. 25 UNIDENTIFIED MALE: No.

KELLY AR # 3401.1 Page 93 of 121 92

1	UNIDENTIFIED FEMALE: Okay.
2	UNIDENTIFIED MALE: No, their project is
3	going to go on that we would not have any interference
4	with what we're proposing to do.
5	UNIDENTIFIED MALE: Yes.
6	UNIDENTIFIED MALE: Yes.
7	UNIDENTIFIED MALE: What's the nature of
8	the contaminants we're talking about? What are they?
9	UNIDENTIFIED MALE: Okay, just to give
10	you an idea, this particular site here was a plating
11	facility, basically chlorinated contact solvents,
12	contact cleaners is what was used in this particular
13	site, PC, TC type contaminants.
14	UNIDENTIFIED MALE: Okay.
15	UNIDENTIFIED MALE: S-8 is two sources in
16	that. Technically there was an underground tank fuel
17	source contamination that was identified within this
18	area, and that's what the initial response was
19	associated with.
20	There also was what was called the green
21	worm, which was a conveyor system that went from the
22	base boundary system, and there were some concrete tanks
23	right along the fence line that contained solvents and
24	these particular parts would come across from the
25	building across the road, come into the dip tanks, and

KELLY AR # 3401.1 Page 94 of 121

then go back, and that's why it was known as a green 1 worm. It was a conveyor belt system that would run from 2 one building to the other. And so you've got solvents 3 and fuel combinations in this particular an area. 4 In this area, the principle source 5 initially was fuel, and that was what was uncovered 6 7 when, in fact, the city started the initial construction of that storm sewer, you know, system right along 8 Quintana Road, it was in this area here, and they 9 encountered the plume and the construction was stopped. 10 11 UNIDENTIFIED MALE: S-6? UNIDENTIFIED MALE: S-6 again is a 12 maintenance, and again, that's solvents. 13 UNIDENTIFIED MALE: Are these plumes that 14 you've identified, have they already presented a hazard 15 or are they simply there and you're going to have to get 16 17 rid of them? They're a source of UNIDENTIFIED MALE: 18 contamination of the shallow aquifer. The intent here 19 is obviously to do what we can do to mitigate that 20 source as much as possible. 21 The aquifer itself will, over time, 22 obviously if you had a lot of time, will clean itself if 23 it didn't have continuing sources, if, in fact, so what 24 25 we're trying to do is obviously attack what we see as

KELLY AR # 3401.1 Page 95 of 121

being those source areas and then obviously do the 1 containment or be sure that we've got complete capture 2 so that nothing, in fact, is going to go anywhere else, 3 and then we'll facilitate the cleaning of the base. 4 5 UNIDENTIFIED MALE: Bob, have you gotten 6 metals anywhere? Metal contamination 7 UNIDENTIFIED MALE: is not significant. Now with respect to S-8, metals has 8 never been identified as a problem there with respect to 9 10 anything that's off the base. Now with respect to on the base itself, 11 there's soils or source area actions that are going to 12 be taking place. In the case of S-8, that particular 13 location was identified for capping. In other words, as 14 well as the installation of a push/pull soil vapor 15 extraction bating system to be installed in this 16 particular area to address product that's located within 17 this particular area. So what we're doing is we're 18 integrating. That's what the next step was that I was 19 going to talk about, the integration of the soils in the 20 21 ground water. Previously those systems were looking to 22 be somewhat independent of one another. Soils was going 23 to go in and they were going to put this in, and then 24 you're going to deal with your ground water as 25

KELLY AR # 3401.1 Page 96 of 121 95

1	secondary. Both have to be combined. I mean, you've
2	got to be looking at those particular systems as a unit
3	and that's what we'll be looking at. In other words,
4	we're looking at proposing a dual casing type system
5	where basically you're going to have a ground water
6	recovery system with a vapor extraction system in one
7	location for purposes of mitigating the source.
8	In other words, we're allowing the system
9	to interact and work together rather than having a
10	system here and then a capture system here and not
11	necessarily working with one another.
12	UNIDENTIFIED MALE: What sort of metals
13	are you seeing?
14	UNIDENTIFIED MALE: I can't answer that,
15	I don't know. Metals have never been identified, at
16	least that I've been involved with, as being anything of
17	importance or being any of the drivers behind anything
18	of what's taking place.
19	UNIDENTIFIED FEMALE: Is that from the
20	plating?
21	UNIDENTIFIED MALE: The metals?
22	UNIDENTIFIED FEMALE: Yes.
23	UNIDENTIFIED MALE: I'm not exactly sure
24	what the source could be. The source could be any
25	number of things but I'm not sure what the metals that

Г

96

1 you're speaking of. 2 UNIDENTIFIED MALE: Just to let you know, 3 there's some pretty high concentrations of chrome and nickel in some parts of the aquifer, like 10, 20 times 4 5 above drinking water standards. 6 UNIDENTIFIED FEMALE: There's a plating 7 company that's by my house and it's got like a lot of 8 metal. 9 UNIDENTIFIED MALE: Yes, there hasn't been, that I'm aware of anyway, anything that's been 10 identified that's specific that these systems are being 11 12 installed to attack from a metals standpoint. The 13 actions are basically associated to your solvents and 14 fuels. 15 UNIDENTIFIED MALE: Just to make a comment, it's a whole lot harder to get the metals out 16 17 than it is the solvents. 18 UNIDENTIFIED MALE: Agreed. 19 UNIDENTIFIED MALE: So that's something 20 you need to look at. 21 UNIDENTIFIED MALE: Although your metals 22 are a little bit less mobile as well as what your solvents would be as well, so mobility within the media 23 is far less within metals. And within the metals, as 24 25 far as finding a significant source, a plating facility

KELLY AR # 3401.1 Page 98 of 121 97

1	certainly could be a potential for that source but we
2	have not found any indication or any particular source
3	in the soils at all within MP. Everything that we've
4	found is associated with actual dissolved product. You
5	know, it's the dissolved portion that's actually in the
6	ground water itself.
7	Did I already do S-4? S-4 again is the
8	fuel situation.
9	Now it's not all fuel. There is, in
10	fact, solvents that are, in fact, present down in this
11	particular area.
12	With respect to the feasibility study,
13	the feasibility study indicated that what we need is
14	basically a containment system, of which that's what's
15	been installed.
16	What we're proposing again here to do is
17	do again the Navarro delineation so that we can identify
18	channeling so that we can confirm the presence of
19	channeling and see where, in fact, those systems are
20	currently placed with respect to where it is that we see
21	the predominant flow of that, you know, contamination
22	moving so that we can ensure that the system is there to
23	capture that prior to its being able to move off the
24	base.
25	And at that point, we would put in
Ľ	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

Г

10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

KELLY AR # 3401.1 Page 99 of 121 98

1 whatever the upgrades are that's required to allow that system to work how it should work in order to capture 2 3 that particular plume so that it, in fact, does move off 4 the base, and at the same time, install whatever 5 infrastructure is required to allow that system to work. 6 It may mean that we do have to, in fact, 7 add new wells. If that's determined that, in fact, 8 there is an area that, in fact, is not being captured, 9 we would at that point add the new wells for that 10 particular capture to go on. 11 UNIDENTIFIED FEMALE: Do you think the 12 containment in that area has been successful so far? 13 UNIDENTIFIED MALE: From what we can see, 14this particular product plume, this map here, as I 15 understand it, is a number of years old and that 16 dissolved plume, as I understand it in looking at the 17 BRA's most recent, is way out in here, but I don't know 18 that the actual product plume has really moved very 19 much. 20 UNIDENTIFIED FEMALE: Okay. 21 UNIDENTIFIED MALE: And right now, that's 22 where your system currently is installed is within that 23 particular plume area. 24 UNIDENTIFIED MALE: That's why things 25 will be determined just how efficient it's working.

```
1
   Also we might be recommending or installing a product
 2
   recovery system.
 3
                   UNIDENTIFIED FEMALE: Are you going to
 4
   give us updates?
 5
                   UNIDENTIFIED MALE: We can give you
 6
   updates -- (Inaudible).
 7
                   UNIDENTIFIED MALE:
                                      When you use the term
 8
   channeling, that's the same as (Inaudible)?
 9
                   UNIDENTIFIED MALE: Yes, channel is
10
   really --
11
                   UNIDENTIFIED MALE:
                                      It's a different word
12
   than I'm used to regarding this but if that's the common
13
   word. I just need to learn if that's --
14
                   UNIDENTIFIED MALE: River channel.
15
                                      Yes, river channel.
                   UNIDENTIFIED MALE:
16
   It's a preferential flow path that water has a tendency
17
   of following, and it's already been proven that
18
   generally where the water flows is where your
19
   contamination is also going to flow and move.
20
                   UNIDENTIFIED MALE: It's just
21
   terminology. I just want to be sure I'm getting the
22
   right termination.
23
                   UNIDENTIFIED MALE: That's why if you've
24
   got a very good analysis of what the situation looks
25
   like here, I mean, if you've got a fairly reasonable
```

KELLY AR # 3401.1 Page 101 of 121

1 number of wells out here that you've analyzed, you can, 2 by basically mapping your contaminants, you can, for the 3 most part, to some degree identify generally where those contaminants are located, and we've looked at the BRA 4 5 and that's what we've done for purposes of trying to 6 initially determine where, in fact, are we located, at 7 least what we seeing being the best locations currently 8 possible.

9 For the most part, as you can see as 10 well, the systems are reasonably there and that you've 11 got the MP system here, you've got the S-8 systems here, 12 and then you've got three legs of a system down here in 13 So the initial system was put in there but what S-4. 14 we're considering is it wasn't put in there based on real data that's actually, you know, mapped out the 15 16 particular Navarro surface and then determined that it 17is, in fact, the most efficient well that could be, in 18 fact, be constructed.

Then with respect to S-6, what we have here is a particular location that's not, to date, obviously there's not been anything that's been installed or initiated but what this is more into in line with our build/design concept. What we're proposing to do in this particular area, there was an eight well capture system that was proposed as part are

1	the rod. We're proposing to engage and basically build
2	that particular capture system step by step.
3	In other words, we'll first come in and
4	define where we believe the channeling to be best
- 5	located in this area, install our first well, and we'll
6	go into pump testing that particular well, determine
7	what the radial of influence is that we can capture from
8	that well, and from modeling, determine, where, in fact,
9	we need to install the next well, then move to the next
10	location, install that particular well, ensure that
11	we've got the complete capture of that particular system
12	and move right on down the system until we have
13	installed that particular capture system that's required
14	with respect to the plume that's present, and then at
15	that particular point, we'll connect the infrastructure
16	associated with that system and then plum it into the
17	ground water treatment plant.
18	So we are, in short, constructing the
19	system versus waiting and just proposing a design and
20	then later come back and do it, and do it based off of a
21	model, because that's the only way we could do it. We
22	could basically go in with a pump test, and based on
23	that information, model where we would see the next well
24	locations being, but that's not optimizing the system.
25	You're not going to give that to somebody else and he's

L

1 going to have assume this is where we put those wells. 2 We're going to put the wells where it is that they need 3 to be put for purposes of ensuring that we've got the 4 complete capture of that particular plume. 5 UNIDENTIFIED MALE: Is that what design/ build means? 6 7 That's what we're UNIDENTIFIED MALE: 8 using design/build as. 9 UNIDENTIFIED MALE: It's concurrent 10 rather than sequential, if you want to put it that way. 11 UNIDENTIFIED MALE: I think that makes a 12 lot of sense. 13 UNIDENTIFIED MALE: It's not necessarily 14 easy but it ensures speed. 15 UNIDENTIFIED MALE: Because what could 16 happen is we could give a design and it would be two 17 years later before you come out with the actual 18 construction and then our design won't be as detailed, 19 like I said, with what we're going to be doing, so that 20 contractor would come out and need to do some testing 21 and hopefully find out, and by at that time the plume is 22 being moved. 23 UNIDENTIFIED MALE: Yes, that's exactly 24 what takes place. The longer you wait, obviously the 25 contamination at that point is moving not exceptionally

KELLY AR # 3401.1 Page 104 of 121 103

1	fast but it is, in fact, moving, so the system that was
2	proposed two years ago may, in fact, not have the
3	capture that's required to address that part of the
4	plume that, in fact, has moved on, so that's why as you
5	build the system, you are, in fact, building a system as
6	you move along that you know is going to capture the
7	system.
8	UNIDENTIFIED MALE: As you go along,
9	based upon what's happening.
10	UNIDENTIFIED FEMALE: Does it make your
11	design more accurate here?
12	UNIDENTIFIED MALE: Yes. The key word is
13	optimization. It locates your wells. It also
14	constructs your wells the best they can be constructed
15	because we're following a procedure, we're going to put
16	test borings in, we're going to basically take
17	geotechnical data and analyze that so that we actually
18	construct a well that's, by its design, is going to do
19	what it needs to do for capturing that particular water
20	body.
21	We're going to put the appropriate type
22	of gravel pack around the well. We're going to identify
23	the appropriate type screen slot size for the well.
24	Whereas it would be different if you went, for instance,
25	and we designed it and said okay, you come in here and

KELLY AR # 3401.1 Page 105 of 121

you just build all these wells this way and install your 1 2 screens at this particular depths and use this particular slot size, it doesn't mean that that's how it 3 4 is that it's actually going to work. I mean, when you get in there, it may not 5 perform the way that it is that you expected because 6 7 you're basing that off of input that you provide in a model, and unless you physically are testing that 8 9 particular well, you don't exactly know how it is that it's actually performing, so that's why we're proposing 10 11 to do this and build a system as we go. UNIDENTIFIED MALE: I like that idea. 12 Ι think, if I understand what you're saying correctly, 13 14 that would also mean that you really don't know how long 15 it's going to take to clean up this plume until you're nearly done building the system, is that right? 16 17 UNIDENTIFIED MALE: For the most part. 18 And --19 UNIDENTIFIED MALE: However, after we've done a very rough correlation, I would think, after 20 we've done MP and we've modeled that MP/S-8, and we're 21 going to have modeled that while we're then going off 22 23 and doing other sites, that's assuming we do them sequentially and not concurrently, then we're going to 24 25 have to modeled that and come up with a prediction as to

KELLY AR # 3401.1 Page 106 of 121 105

how much faster that's going to go and we could apply 1 that generally. Like if there is you know, a three to 2 one reduction, we could say, gosh, we're hoping to get a 3 three to one reduction with the rest of it. 4 UNIDENTIFIED MALE: What model are you 5 going to use, do you know yet? 6 7 UNIDENTIFIED MALE: Well, we're looking at probably motion flow as being the principle model 8 9 that we're going to utilize. That's the most commercially accepted and most everybody is utilizing 10 11 it. UNIDENTIFIED MALE: That would be within 12 our GIS system also so our GIS system will be helping us 13 throughout this. 14 UNIDENTIFIED MALE: So the optimization 15 is, I quess there's three things that it keys on. Not 16 only most importantly putting in the most efficient 17 system, I think that's the most important thing. Also 18 it's saving time in terms of getting the system in place 19 and being the most efficient, saving time in terms of 20 the ultimate clean-up and it's saving a lot of money, 21 and I could name ten different areas where it's saving 22 23 money throughout the whole process. UNIDENTIFIED MALE: Have you all actually 24 25 gone through this sort of process elsewhere?

KELLY AR # 3401.1 Page 107 of 121 106

1 UNIDENTIFIED MALE: We think this is a 2 novel idea and Mr. Bailey has taken the chain all the 3 way up to the Undersecretary of Defense for the 4 Environment and Security, and he basically said "Wow." 5 UNIDENTIFIED MALE: There's been a 6 general trend towards (Inaudible). 7 UNIDENTIFIED MALE: What I'm saying is, 8 has this particular concept as applied to what's 9 happening at Kelly in terms of the optimization and it 10 turning into a final remediation system -- I mean, 11 design/build is something that certainly is a concept of 12 \_ \_ 13 UNIDENTIFIED MALE: Right. 14 UNIDENTIFIED MALE: But as applied to 15 clean-up of contaminants. 16 UNIDENTIFIED MALE: It's not been applied 17 this way, that we're aware of. 18 UNIDENTIFIED MALE: A lot of the clean up 19 projects are government and the government has a tendency not to like design/build because it's possible, 20 21 it has the potential that the designer, if he's also the 22 builder, he'll conspire with himself to design a 23 (Inaudible), and you can say, "Well, geez, if I'm 24 designing this, I may as well go for broke. Since I'm 25 going to build it, if I build a ten million dollar

KELLY AR # 3401.1 Page 108 of 121 107

1 system, that's a lot better than me building a five 2 million dollar system so I'll design a ten million 3 dollar system." 4 But that paranoia is not worth the cost 5 of breaking apart, plus breaking apart those two 6 contract actions into two separate companies, if you've 7 ever been to a construction site where the architect is 8 standing there and builder is standing there and they're 9 arguing about the same thing, they're all building the 10 same house, you realize the inefficiencies of designing 11 and then building. And the private sector has said, 12 "Hey, this is great. It's a win/win." And government 13 is, "Well, we just got to be sure we're wise about these 14 tax dollars." It's the old spend a dollar to save a 15 penny. But they're coming around. 16 Some sectors of the government are 17 starting to say design/build, yes, maybe it does make 18 sense. The Air Force is getting there. 19 UNIDENTIFIED MALE: And what we're doing 20 is basically calling this optimization, we're not 21 calling this design/build. 22 UNIDENTIFIED MALE: Technically this was 23 originally proposed. We're running and operating the 24 (Inaudible) systems. 25 UNIDENTIFIED MALE: You'll never see
1	design/build in this presentation.
2	UNIDENTIFIED MALE: That's the other
3	thing. Paint a horse, you know, black and white.
4	UNIDENTIFIED MALE: So these pump tests
5	you're proposing are actually part of this process
6	you're talking about?
7	UNIDENTIFIED MALE: Yes.
8	UNIDENTIFIED MALE: That's what I say,
9	we're doing it smart enough to where they end up to be
10	the final (Inaudible), saving lots of money.
11	UNIDENTIFIED MALE: Now in the event, for
12	instance, and that's why we're delineating. If we find
13	wells that aren't installed properly or, if, in fact, we
14	were to install The first well, you have to start
15	some place based on the best information.
16	If, in fact, we determine that that well
17	was not placed in the most appropriate location, then
18	that well is, at that point our assumption is we're
19	going to do all we can to place it where it needs to be
20	based on the best information available.
21	Once, in fact, the well is installed and
22	we do the pump test and we're not capturing or getting
23	the response at the well we expect to get, then at that
24	point, we would have to look to see what else there is
25	for us to do to address and get a well in there that's

F

1	going to do what we need to have done.
2	UNIDENTIFIED MALE: But with the
3	geophysics and with the geotechnical testing which
4	hasn't been done before in terms of doing geotechnical
5	testing prior to putting the well in, it's very
6	important to find out what the slot size, et cetera. We
7	think we're going to be free of risk.
8	UNIDENTIFIED MALE: The gentleman back
9	there (Inaudible.)
10	UNIDENTIFIED MALE: I don't know if this
11	even comes into play at all in our operating systems.
12	They need to operate 24 hours a day and they need back-
13	up and what not. If a pump fails, the power goes off
14	for a period of time, is there any system here that you
15	have anything for a back-up? I'm just wondering.
16	UNIDENTIFIED MALE: Yes. Well, we're
17	involved with the whole process, which makes it sort of
18	nice because we're also involved with the design upgrade
19	of the plant facility and the control systems that are
20	going to be located out at the sites that will have the
21	appropriate alarm systems on them that trigger off what
22	the reactions are if, in fact, something stops.
23	Currently the systems are interim. We're now installing
24	the final systems, so now along with the final systems,
25	we're building that system so that we can work that

Γ

KELLY AR # 3401.1 Page 111 of 121 110

1	system.
2	UNIDENTIFIED MALE: You know, if a pump
3	went out, I don't know how critical that would be, if
4	you have order a replacement pump and get it in a month.
5	UNIDENTIFIED MALE: Well, as a result of
6	having the old contract, we have the pumps. We
7	basically operate the existing systems currently so we,
8	in turn, make that system run.
9	UNIDENTIFIED MALE: You've got a fail
10	safe system essentially.
11	UNIDENTIFIED MALE: (Inaudible). There
12	are certainly things that are sending water there
13	expecting the plant to be there, more critical at the
14	plant end.
15	At the upper end, it's less critical. If
16	the pumps go down for a certain period of time, well, we
17	can go out and fix them in due time. But at the bottom
18	end, there's an expectation that the bottom end is ready
19	for all this water, so there's a lot of redundancy
20	that's built into the plant alarms by our operators.
21	UNIDENTIFIED FEMALE: I had a question
22	about the one kind of design that you're considering for
23	the (Inaudible). Is it going to have the same sort of
24	system or are you considering
25	UNIDENTIFIED MALE: I think they're

KELLY AR # 3401.1 Page 112 of 121

1	included in it.
2	UNIDENTIFIED MALE: Yes, that's what the
3	whole point is of trying to focus again on the
4	channels. That's where those things are, in fact, going
5	to be present and that's where, with respect to the
6	final solution and how it is, you had hit on it with
7	respect to the systems operating continuously.
8	There's a reason why you operate a system
9	continuously and then there's other ways that you can
10	run that system and allow that system to work, you know,
11	run stop, run stop. There's a reason why you would want
12	that particular concept to work, because it's going to
13	do something to allow things to happen within the
14	shallow aquifer and allow you to help mitigate the
15	system quicker.
16	We're going to be evaluating how You
17	know, right now these systems basically run
18	continuously. With respect to developing a source
19	mitigation system, we're changing the perspective of
20	just containment. In other words, we're now changing
21	how things were currently working.
22	What we want to do is we don't want to
23	just de-water the source area because it's going to
24	effect the containment system, and what we want is
25	actually we want this particular source area to move.
	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533

KELLY AR # 3401.1 Page 113 of 121 112

1 We want to remove the source and then we want flushing 2 to go on through here and then we capture that 3 particular flushing at that particular containment 4 structure so that we're cleaning. 5 Just by going in and just pumping and 6 pumping and pumping, you're not doing anything with 7 respect to really helping to mitigate things any 8 quicker, so what we're looking at are different 9 techniques that we can operate these particular system 10 under that would allow us to address those other 11 particular concerns. 12 UNIDENTIFIED MALE: Are you thinking of 13 incorporating ejection wells in your design? 14 UNIDENTIFIED MALE: No. We've evaluated 15 injection wells because they were in Zone 2. 16 From an evaluation standpoint, we 17 actually did re-injection tests in Zone 2 because there 18 was, as a part of preferred alternative, injection was, 19 in fact, an alternative that was recommended. It wasn't 20 just the fact that the O and M on ejection wells --21 historically we've gone through those people who have 22 built them and those people who are operating them. 23 They're very high cost, they're very high maintenance. 24 In most cases, those particular systems have to be 25 replaced relatively frequently.

1	UNIDENTIFIED MALE: How frequently, do
2	you have a rough idea?
3	UNIDENTIFIED MALE: We're talking, what I
4	know of, about five years. That's about the life
5	expectancy of an ejection system. So it's been
6	determined the value that that, in fact, is going to
7	provide, we can essentially, we believe, have basically,
8	by the flushing of that particular shallow aquifer,
9	accomplish the same thing.
10	And with respect to Zone 2, where it was
11	planned, it technically, in itself, becomes a barrier.
12	I mean, you're changing the shallow aquifer when you're
13	now starting to push water into it so it changes what
14	the current conditions are, what your objective is with
15	respect to what you're trying to do as far as clean-up.
16	UNIDENTIFIED MALE: Do you have any
17	reason to believe that denapples exist anywhere in the
18	shallow aquifer?
19	UNIDENTIFIED MALE: I would have to
20	suspect that denapples are TC/PC's. I mean, any of your
21	heavies are
22	UNIDENTIFIED MALE: No, I'm talking about
23	emissible phase, liquid TCE.
24	UNIDENTIFIED MALE: I'd have to contend
25	that it might exist. We haven't been able to
	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

1 necessarily --UNIDENTIFIED MALE: There's no evidence 2 3 of it? I haven't seen any. 4 UNIDENTIFIED MALE: 5 UNIDENTIFIED MALE: Do you know of any? UNIDENTIFIED FEMALE: No, I (Inaudible). 6 7 UNIDENTIFIED MALE: Yes, the only project 8 that really is doing the base-wide analytical would be the BRA, and the BRA, as I understand it to date has not 9 10 uncovered anything of that kind. UNIDENTIFIED FEMALE: (Inaudible). 11 Has the (Inaudible) actually been determined for all these 12 13 sites? UNIDENTIFIED MALE: Yes. Now the ones 14 that were, in fact, that there's source mitigation 15 16 proposed, and when I indicate source, I think we're confusing. I don't want to confuse ground water source 17 18 and soils source. 19 UNIDENTIFIED FEMALE: Right. UNIDENTIFIED MALE: And with respect to 20 21 those areas where there's soil contamination present and 22 systems that are being installed in those particular areas, it has been delineated, and that's why it is that 23 the system has, in fact, been proposed in that area. 24 25 There was, as a part of initial RD, there

KELLY AR # 3401.1 Page 116 of 121 115

1	was a significant effort done with respect to trying to
2	delineate obviously the surface extent, the aerial
3	extent of that particular plume with an extensive
4	geoprobe effort, and then there was also another
5	particular effort to vertically determine what the
6	extent of that particular plume was for purposes of
7	designing the system that's proposed to go in.
8	So there is an air push/pull system that
9	was proposed up in here with capping that was a part of
10	preferred soils alternatives.
11	There's also another one down here with
12	respect to a push/pull system of air, basically
13	involving an SB system that was proposed associated to
14	this point.
15	MP had nothing proposed to it because
16	they've never been able to identify any real source
17	material in the media itself. Everything is basically
18	in the water, so it's in the dissolved portion, so there
19	was no source mitigation action taken other than ground
20	water source attack with respect to MP.
21	So from that standpoint, we're
22	approximating this to be roughly a two year period that
23	we'll have a system in place and in operation.
24	Now the only factors that we see that
25	have any effect potentially on this is if, in fact,

Г

KELLY AR # 3401.1 Page 117 of 121 116

1 something brand new, in the process of our doing are 2 particulate testing is something new that was never 3 anticipated, as well as if there's a new technology that 4 would come up. UNIDENTIFIED MALE: Yes, one of the 5 6 things that I keep coming back to is the hydrogeological 7 conditions. Everybody seems to be making this assumption but the (Inaudible) is a very homogenous, 8 9 non-porous, impermeable laying. 10 As George has pointed out, there are some 11 areas in there which have permeability. Something else 12 I've seen firsthand, particularly in the active zone, is 13 that you develop fractures in the Navarro. Now I know 14 that sounds wild that you can get crack fractures in 15 that clay but what happens is that during the desiccation of that clay under (Inaudible) conditions, 16 17 you get varying fractures, and then often what will 18 happen is that gypsum will line those fractures and then 19 when the thing closes up during wet periods, the gypsum 20 acts as a prop to keep those open, and I've seen bore 21 holes on the St. Mary's campus where you would have water pouring out of those things. So there are 22 23 discreet channels through the Navarro. They're hard to 24 find because they are very discreet. UNIDENTIFIED MALE: I agree, and that's 25

KELLY AR # 3401.1 Page 118 of 121 117

1 (Inaudible) channels as well even. And then when you're 2 trying to find those, we have attempted to try to come 3 as close as we can, I agree with what you said. It's 4 very difficult to find these things. 5 Now the only thing you can do is 6 obviously monitor wells that have been installed to 7 address that kind of contamination to see if, in fact, 8 you find any kind of indication or trace. 9 At this point obviously, the Edwards is 10 obviously being monitored on a fairly regular basis and 11 there's not been anything, at least with respect to 12 communication with the Edwards, that I'm aware of 13 anyway. But there is certainly always the possibility 14 with respect to false end fractures that something, in 15 fact, would be going on. 16 UNIDENTIFIED MALE: What is it that's 17 going to be completed in two years? The remedial action 18 says completed in two years, what does that mean? 19 UNIDENTIFIED MALE: All of the Zone 3 20 systems. 21 UNIDENTIFIED MALE: Does that mean you 22 will have everything built in two years? 23 UNIDENTIFIED MALE: That's exactly right. 24 UNIDENTIFIED FEMALE: And by that time, 25 you'll be able to predict how long the actual clean-up FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

1 will take, right? 2 UNIDENTIFIED MALE: At that point, we'll 3 be monitoring exactly how well the system is performing 4 and evaluate just exactly how quickly it's cleaning. 5 UNIDENTIFIED MALE: That's another good 6 thing in terms of this quick period of optimizing the 7 systems and putting the final fixes in place is during 8 this very short period of time, you'll have a baseline 9 model that's there, and it's a very good baseline model 10 and it's been done during a very specific period of time 11 so that it's all integrated together and can then be 12 updated throughout. 13 Anything else? UNIDENTIFIED MALE: 14 UNIDENTIFIED MALE: Thank you very much. 15 That was a great presentation. Thanks everyone for 16 coming. 17 I just want to say one thing with regard 18 to Zone 3 clean-up. 19 Miscommunication occurred. The things 20 that some of us were asking for was clean-up of 21 contaminated ground water in the zone, in the O'Connor 22 Road neighborhood. So, you know, let's have another one 23 of these soon, I hope, to discuss that. Thank you. 24 UNIDENTIFIED MALE: Thanks everyone. 25 (End of tape.)

1	THE STATE OF TEXAS )
2	COUNTY OF BEXAR )
3	
4	
5	REPORTER'S CERTIFICATE
6	
7	I, LYNNE M. RODRIGUEZ, a Certified Shorthand
8	Reporter in and for the State of Texas, do hereby
9	certify that this transcript is as true and correct a
10	record as possible, transcribed from an audio recording,
11	of the proceedings recorded herein.
12	I further certify that I am neither attorney
13	nor counsel for, nor related to, nor employed by any of
14	the parties to the action in which this testimony was
15	taken. Further, I am not a relative of any attorney of
16	record in this cause, nor do I have a financial interest
17	in this action.
18	SUBSCRIBED AND SWORN to on this the 24th
19	day of September, 2007.
20	
21	Lynne M. Rodriges
22	for the State of Texas,
23	Certification No. 8040
24	
25	
	FEDERAL COURT REPORTERS OF SAN ANTONIO, INC.

10100 REUNION PLACE, STE. 660, SAN ANTONIO, TEXAS 78216 PHONE: (210) 340-6464 / FAX: (210) 341-5533



## ADMINISTRATIVE RECORD

## FINAL PAGE