



KELLY AFB
TEXAS

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 3239

Kelly Restoration Advisory Board (RAB)

Meeting Agenda*

January 10, 2006

Kennedy High School, Cafeteria

1922 S. General McMullen

- | | | |
|-------------|---|---|
| 6:30 - 6:45 | Introduction
A. Pledge of Allegiance
B. Moment of Silence
C. Agenda Review
D. Packet Review
E. Opening Community Comment Period
<i>Comments limited to <u>four</u> minutes</i> | Dr. David Smith |
| 6:45 - 7:00 | Administrative
A. Approval of Minutes; Oct. 2005 - Dec. 2005
B. AFRPA Update | Mr. Robert Silvas
Ms. Norma Landez |
| 7:00 - 7:15 | Community Cochair Elections
A. Candidate Oral Presentations
<i>2-minute presentation followed by 3-minute question and answer session per candidate</i>
B. Voting by Ballot
C. Voting Results/ Announcement of 2006 Community Cochair | Dr. David Smith |
| 7:15 - 7:45 | Community Involvement Plan Briefing | Ms. Sonja Coderre |
| 7:45 - 8:15 | TAPP Report - 2005 Semiannual Compliance Plan | Mr. Patrick Lynch |
| 8:15 - 8:30 | Questions and Answers | RAB Community Members |
| 8:30 - 9:00 | Environmental Contamination Associated
With Former Kelly Air Force Base | Ms. Wilma Subra |
| 9:00 - 9:15 | Questions and Answers | RAB Community Members |
| 9:15 | Meeting Wrap-up

A. Closing Community Comment Period
<i>Comments limited to <u>four</u> minutes</i>
B. Next TRS Meeting
March 14, 6:30 p.m.: Environmental Health & Wellness Center, 911 Castroville Rd*
C. Next RAB Meeting
April 11, 6:30 p.m.: Kennedy High School, Cafeteria, 1922 S. General McMullen* | Dr. David Smith |
| 9:30 | Adjournment | |

**Meeting dates, locations and agenda items are subject to change.*

January 10, 2006
Kelly Restoration Advisory Board (RAB)
Kennedy High School Cafeteria
1922 S. General McMullen
San Antonio, Texas 78237

DRAFT Meeting Minutes

RAB Community Member Attendees:

Robert Silvas, Community Cochair
Esmeralda Galvan
Rodrigo Garcia
Coriene Hannapel
Henrietta LaGrange
Ruben Martinez
Nazirite Perez
Armando Quintanilla
Michael Sheneman

RAB Government Member Attendees:

Adam Antwine, Installation Cochair
Gary Martin, Greater Kelly Development Authority (GKDA)
Gary Miller, Environmental Protection Agency (EPA), Region VI
Melanie Ritsema, San Antonio Metropolitan Health District (SAMHD)
Mark Weegar, Texas Commission on Environmental Quality (TCEQ)

Other Attendees:

David Smith, Facilitator
Guadalupe Alvarado
Robert Alvarado
Mike Carrillo
Sonja Coderre, Air Force Real Property Agency (AFRPA)
Todd Colburn, AFRPA Contractor
Antonio Diaz
Larisa Dawkins, AFRPA
Alan Ferrell, SAMHD
Ben Galvan (Alternate for Ms. Esmeralda Galvan)
Jill Johnston
Linda Kaufman, SAMHD
Patrick Lynch, Clearwater Revival
Eduardo Martinez, AFRPA Contractor
Jerry Needham, Express-News
Abigail Power, TCEQ (Alternate for Mark Weegar)
Genaro Rendon
Rosa Rosales
Claudia Sanchez
Lisa Sorg, SA Current
Wilma Subra, Subra Company
Brad Watson, Zephyr
Joe Zupan, Zephyr

The meeting began at 6:32 p.m.

I. Introduction – Dr. David Smith

Dr. Smith began the meeting by welcoming RAB members and other attendees. Dr. Smith turned the meeting over to Community Cochair Mr. Robert Silvas. Mr. Silvas made several motions, which are identified below; all were approved.

Mr. Silvas motioned to remove the Pledge of Allegiance and Moment of Silence from the agenda. Mr. Sheneman seconded the motion. All were in favor, and none opposed.

Mr. Silvas motioned to accept the meeting packet as-is, and to not conduct the packet review. Mr. Quintanilla seconded the motion. All were in favor, and none opposed.

Mr. Silvas motioned to move the approval of the meeting minutes to the next meeting. Mr. Sheneman seconded the motion. All were in favor, and none opposed.

Mr. Silvas motioned to vote for the 2006 Community Cochair through acclamation instead of by ballot. Ms. Galvan seconded the motion. All were in favor, and none opposed.

Mr. Silvas motioned to move Ms. Wilma Subra's presentation on the Environmental Contamination Associated with the Former Kelly Air Force Base to be the first in the series of presentations. Ms. Galvan seconded the motion. All were in favor, and none opposed.

Mr. Silvas motioned to move Mr. Patrick Lynch's presentation on the TAPP Review of the *January 2005 Semiannual Compliance Plan* to be the second in the series of presentations. Mr. Garcia seconded the motion. All were in favor, and none opposed.

Mr. Silvas motioned to move Ms. Sonja Coderre's presentation on the Community Involvement Plan last in the series of presentations. Ms. Galvan seconded the motion. All were in favor, and none opposed.

A. The Pledge of Allegiance was removed from the agenda per Mr. Silvas' previous motion.

B. The Moment of Silence was removed from the agenda per Mr. Silvas' previous motion.

C. An agenda review was not conducted due to time constraints.

D. The meeting packet was accepted as-is per Mr. Silvas' previous motion.

E. During the opening community comment period, Ms. Rosa Rosales, National Vice President for the Southwest Region of the League of United Latin American Citizens (LULAC) addressed the RAB. She informed them they had her full support, and would discuss their situation at the LULAC National Convention being held 6 February 2006 in Mexico.

II. Administrative

A. The approval of meeting minutes was moved to the agenda for the next RAB meeting per Mr. Silvas's previous motion.

B. Ms. Sonja Coderre provided the AFRPA update in Ms. Norma Landez' absence, and addressed the following topics:

- No Base Closure Team (BCT) meeting was held this month
 - Final 13 December 2005 BCT Meeting Minutes provided in the meeting packets
- Industrial Wastewater Permit No. WQ0003955000
 - Public Notice published 9 December 2005 in the *San Antonio Express News*
 - Provided to RAB members in the 13 December 2005 TRS meeting packets
- Notice of Proposed Corrective Measures (Closure of 10 Sites)
 - Public Notice published 16 December 2005 in the *San Antonio Express News*
 - Provided to RAB members in the read-ahead packets for this meeting and again in this meeting's packets
- Class 3 Modification to Compliance Plan No. 50310 Public Meeting
 - Scheduled for 11 January 2006 from 6:00 to 7:30 p.m. at the GKDA Conference Room, 143 Billy Mitchell Blvd, Suite 6
 - Meeting Announcement published in the *San Antonio Express News* 3 January 2006; copy provided in the meeting packets
- Full page ads providing an environmental restoration update and encouraging community members to participate in the RAB
 - Spanish version published in *La Prensa* 21 December 2005
 - English version published in the *Southside Reporter* 22 December 2005
 - Copies of both ads provided in your meeting packets
- Building 326 USAF Radio Isotope Committee (RIC) Permit
 - Permit is still active
 - Second draft of final report is being reviewed and will be sent to EPA mid February 2006

Ms. Coderre also discussed recent documents to be placed in the Cochair Library at the Environmental Health and Wellness Center (EHWC) following the meeting. Those documents are as follows: 1) Class 3 Modification to Compliance Plan CP-50310 Former KAFB for Zone 4 and Zone 5, 2) Conditional Approval-Final Corrective Measures Implementation Construction Completion Report for S-4 Letter from TCEQ, 3) RRS2 Closure UST Removals, Building 347, SWMU 47 Letter from TCEQ, 4) Declaration of Administrative Completeness Class 3 Modification to Compliance Plan Letter from TCEQ, 5) Public Notice of Proposed Corrective Action for Resource Conservation and Recovery Act (RCRA) Regulated Unit Site SA-2 NOR Unit No. 1

Mr. Quintanilla asked if public transportation was available to access the Class 3 Modification Public Meeting. Mr. Gary Martin informed him that the VIA bus stopped at Tinker and Duncan.

Mr. Quintanilla then asked that public transportation information be provided for these types of meetings in the future.

III. Community Cochair Elections – Dr. David Smith

Dr. David Smith reiterated the election would be held through acclamation instead of voting by ballot. He asked if there were any nominations. Ms. Henrietta LaGrange nominated Mr. Robert Silvas. Mr. Rodrigo Garcia seconded the nomination. There were no other nominations.

Mr. Quintanilla called for the vote to re-elect Mr. Silvas to a second term as Community Cochair. All were in favor and Mr. Silvas was re-elected.

IV. Environmental Contamination Associated with the Former Kelly Air Force Base – Ms. Wilma Subra

Following an overview of her previous experience, Ms. Subra presented her review of the *January 2005 Semiannual Compliance Plan* report. Her findings were documented in the report entitled *Environmental Contamination Associated with the Former Kelly Air Force Base*. In her presentation, she identified three issues; the cleanup must be done right the first time, Leon Creek contamination and offsite shallow groundwater contamination.

Mr. Quintanilla recommended Ms. Subra be asked to provide this briefing at future orientation training. He added that new members need explanations of what things such as Class 2 and 3 Modifications and Risk Reduction Standards (RRS) are.

V. TAPP Review of the January 2005 Semiannual Compliance Plan – Mr. Patrick Lynch

Mr. Lynch gave his final oral presentation on the review of the *January 2005 Semiannual Compliance Plan*, conducted in accordance with TAPP. The goal of the review is to provide an overall assessment, focus on off-base impacts, identify locations that need monitoring wells, identify any trends in contamination and respond to TRS comments. The draft report was included in the meeting packets. Upon conclusion of the presentation, Dr. Smith reminded RAB members to fill out the TAPP surveys and submit them by the end of the meeting.

Mr. Rodrigo Garcia stated that AFRPA needs to hire a contractor that will do a better, more professional job of writing reports.

VI. Community Involvement Plan Briefing – Ms. Sonja Coderre

Ms. Coderre began by asking everyone to turn in their Consent Authorization forms. Mr. Silvas wanted contact information posted on the Web site. Ms. Coderre stated that she would need written authorization from each RAB member in order to do so, and asked that RAB members state so on their Consent Authorization forms.

Ms. Coderre then presented information on the Community Involvement Plan at Kelly. She discussed legal requirements, organization of the plan, past outreach efforts, information gathering processes, community concerns/issues and current/future involvement opportunities.

Mr. Quintanilla asked that on the next Community Involvement Plan update, AFRPA include information on Environmental Justice. Ms. Hannapel asked for a report on responses AFRPA has received back from community feedback forms. Additionally, a copy of the transcript from the

13 December 2005 TRS meeting was requested from Ms. Hannapel, Ms. Galvan, Mr. Perez, Mr. Garcia, Mr. Martinez, and Ms. LaGrange.

Mr. Quintanilla then stated the Information Repository needs to be relocated near Kelly because the current location was too far from Kelly. Finally, Ms. Galvan asked for a review of the health studies conducted by PCEH.

VI. Meeting Wrap-Up

The next TRS meeting will take place 14 March 2006 at 6:30 p.m. at the Environmental Health and Wellness Center, 911 Castroville Road.

The next RAB meeting will take place at 6:30 p.m., 11 April 2006 in the cafeteria of Kennedy High School, 1922 South General McMullen.

VII. Meeting Adjournment

The meeting adjourned at 9:48 p.m.

Attachments:

- Meeting agenda, 10 January 2006 RAB
- Meeting minutes, October 2005-December 2005, unsigned
- Final BCT minutes, 13 December 2005
- December 2005 TRS action item report
- AFRPA ad placed in Express-News, Notice of Corrective Measures, 16 December 2005
- AFRPA ad placed in Express-News, Class 3 Modification to Compliance Plan No. CP-50310, public notice, 3 January 2006
- AFRPA full page ads, Kelly environmental restoration activities, Southside Reporter – 22 December 2005 and La Prensa – 21 December 2005
- Documents placed in Cochair library, January 2006 and December 2005/signed
- Chart, Comparison of RCRA, IRP, and CERCLA Phases and Milestones
- Community Involvement Plan for the former Kelly AFB, April 2004
- Community Involvement Plan briefing handouts, 10 January 2006
- Clearwater Revival Company TAPP briefing handouts, January 2005 Semiannual Compliance Plan Report and KellyUSA 2004 Groundwater Assessment TAPP Review
- Wilma Subra briefing handouts, Environmental Contamination Associated With Former Kelly AFB, 10 January 2006
- AFRPA “Thank-You” letters to outgoing RAB members
- AFRPA response to Robert Silvas RFI, Re: Geomatrix TAPP reports
- SA Current article, Re: Kelly cleanup, 4 January 2006

Robert Silvas
Community Cochair

Date

Adam Antwine
Installation Cochair

Date

October 18, 2005
Kelly Restoration Advisory Board (RAB) Meeting
Kennedy High School, Cafeteria
1922 S. General McMullen
San Antonio, Texas 78226

Draft Meeting Minutes

RAB Community Member Attendees:

Mr. Robert Silvas, Community Co-Chair
Ms. Esmeralda Galvan
Ms. Coriene Hannapel
Ms. Henrietta LaGrange
Mr. Nazarite Perez
Mr. Armando Quintanilla
Mr. George Rice
Mr. Michael Sheneman
Ms. Carol Vaquera

RAB Government Member Attendees:

Mr. Adam Antwine, Installation Co-Chair
Ms. Kyle Cunningham, San Antonio Metropolitan Health District (SAMHD)
Mr. Mark Lyssy, Environmental Protection Agency (EPA) Region VI
Mr. Gary Martin, Greater Kelly Development Authority (GKDA)
Mr. Mark Weegar, Texas Commission on Environmental Quality (TCEQ)

Other Attendees:

Dr. David Smith, Facilitator
Ms. Sonja Coderre, Air Force Real Property Agency (AFRPA)
Mr. Todd Colburn, AFRPA Contractor
Ms. Larisa Dawkins, AFRPA
Mr. Ben Galvan, Community Member
Mr. Troy Gonzalez, AFRPA Contractor
Ms. Laura Guerrero-Redman, AFRPA Contractor
Ms. Tanya Huerta, Community Member
Ms. Linda Kaufman, Public Center for Environmental Health (PCEH)
Ms. Norma Landez, AFRPA
Mr. Sam Murrell, Community Member
Ms. Abigail Power, TCEQ (Alternate for Mr. Mark Weegar)
Ms. Heather Ramon-Ayala, AFRPA Contractor
Mr. William Ryan, AFRPA
Mr. Eduardo Salinas, AFRPA Contractor

The meeting began at 6:36 p.m.

I. Introduction – Dr. David Smith

Dr. Smith began the meeting by welcoming RAB members and other attendees. The meeting started with the Pledge of Allegiance, followed by a moment of silence. Dr. Smith then reviewed the agenda items for the evening and the RAB meeting packets which included:

- Signed Minutes, December 2004 – September 2005
- ALS Executive Summary and Bilingual Fact Sheet
- “TCEQ Letter (13 Sep 05) - León Creek Fish Kill”
- June, July, August BCT Minutes
- Presentation – Overview of RAB
- Presentation – Election Process
- Candidate Forms
- Recent Responses to Requests for Information (RFIs) and Freedom of Information Act (FOIA) Requests
- Recent TCEQ Correspondence Filed at the Information Repository
- News Clips
- Presentation - Class 3 Modification to Compliance Plan 50310

Dr. Smith informed RAB members who were interested in participating in the appointment process needed to notify the RAB Community Co-Chair.

II. Community Comment Period – Dr. David Smith

No community comments were made.

III. AFRPA Update

A. Mr. Antwine provided an AFRPA Update. Mr. Antwine discussed the ALS study conducted by the Air Force Institute for Operational Health (AFIOH), and copies provided by AFIOH were distributed to RAB members. Mr. Antwine also stated a major milestone had been reached with the completion of the final off-base permeable reactive barrier and followed that discussion with a fiscal year 2005/2006 update.

B. Ms. Landez provided a Class 3 Modification briefing.

Ms. Landez reviewed slides for the Class 3 Modification briefing which were included in RAB packets.

Mr. Quintanilla asked to be provided with the costs involved in the Class 3 Modification to the Compliance Plan for Zones 4 and 5.

Mr. Silvas asked for the public comment deadline for the Class 3 Modification public meeting.

C. Ms. Landez provided a BCT Update.

Ms. Landez informed the RAB the BCT meeting had just occurred several hours prior to the RAB meeting, 18 October 2005.

D. Ms. Landez provided the Spill Report.

Ms. Landez provided an overview regarding a spill which occurred at the Zone 4 Groundwater Treatment Plant. No other spills were reported.

IV. Overview of the RAB Presentation – Ms. Sonja Coderre

Ms. Coderre provided a RAB member presentation. The slides for this presentation were included in the RAB meeting packets. Items covered in this presentation included RAB mission and purpose, RAB composition and RAB member roles.

V. Explanation of the Voting Process – Ms. Laura Guerrero-Redman

Ms. Guerrero-Redman provided an explanation of the RAB voting process. The slides for this presentation were included in the RAB meeting packets. Items covered in this presentation included RAB composition, terms of office, candidate introductions and open positions on the Kelly RAB.

A break occurred at 8:20 p.m. The meeting reconvened at 8:30 p.m.

VI. Local Candidate Elections – Ms. Laura Guerrero-Redman and David Smith

Mr. Perez gave a presentation seeking re-appointment for two additional consecutive years.

Mr. Sheneman gave a presentation seeking re-appointment for two additional consecutive years.

Local Community Candidates:

Mr. Perez was reappointed with nine votes.

Mr. Sheneman was reappointed with eight votes.

VII. All Other Candidate Elections – Ms. Laura Guerrero-Redman and Dr. David Smith

Ms. Galvan gave a presentation seeking re-appointment for two additional consecutive years.

Other Community Candidates:

Ms. Galvan was reappointed with nine votes.

Dr. Smith reminded the reappointed RAB members their new terms would begin 1 January 2006. He also informed the RAB there were now six open seats on the RAB.

VIII. Voting Results/Announcements of 2006 Community RAB Members – Ms. Laura Guerrero-Redman

Reappointed RAB members were announced. Mr. Sheneman, Mr. Perez, and Ms. Galvan were reappointed. No new members were appointed to the Kelly RAB.

IX. Meeting Wrap-Up

Mr. Antwine provided notice to the RAB about a new provision approved by TCEQ regarding early transfer of property.

Mr. Antwine and fellow RAB members also thanked Mr. George Rice and Ms. Carol Vaquera for their service on the Kelly RAB.

Mr. Silvas addressed several action items for the AFRPA to address.

- Bring in Brooks to brief the RAB on the ALS Report.
- Include the approval of signed minutes, December 2004 – September 2005, as an agenda item for the November Executive Committee meeting.
- Have Mr. Bill Hall brief the RAB on the Zone 4 Groundwater Treatment Plant spill, which occurred 5 October 2005.
- Address the issue of having Ms. Wilma Subra provide a presentation at no cost to the RAB.

Mr. Quintanilla requested a briefing on the Air Force Community Involvement Plan be added to the agenda for the January 2006 RAB.

X. Meeting Adjournment

Mr. Antwine moved for adjournment. Mr. Sheneman seconded the motion. The motion was voted on by the RAB, nine for and none opposed.

The meeting adjourned at 9:15 p.m..

Robert Silvas
Community Co-Chair

Date

Adam Antwine
Installation Co-Chair

Date

November 8, 2005
Technical Review Subcommittee (TRS) Meeting
of the Kelly Restoration Advisory Board (RAB)
Environmental Health & Wellness Center
911 Castroville Road
San Antonio, Texas 78237

DRAFT Meeting Minutes

RAB Community Member Attendees:

Mr. Robert Silvas, Community Co-Chair
Ms. Nancy Garcia (Alternate for Mr. Ruben Martinez)
Mr. Rodrigo Garcia
Ms. Coriene Hannapel
Ms. Henrietta LaGrange
Mr. Nazarite Perez
Mr. Armando Quintanilla
Mr. Michael Sheneman

RAB Government Member Attendees:

Ms. Kyle Cunningham, San Antonio Metropolitan Health District (SAMHD) (Alternate for Ms. Melanie Ritsema)
Mr. Gary Miller, Environmental Protection Agency (EPA) Region VI
Mr. Mark Weegar, Texas Commission on Environmental Quality (TCEQ)

Other Attendees:

Dr. David Smith, Facilitator
Ms. Sonja Coderre, Air Force Real Property Agency (AFRPA)
Mr. Todd Colburn, AFRPA Contractor
Mr. Chris Cunanan, Community Member
Ms. Norma de los Santos, Community Member
Mr. Alan Ferrell, SAMHD
Ms. Bianca Guerrero, Community Member
Mr. Bill Hall, AFRPA
Ms. Norma Landez, AFRPA
Mr. Greg Lyssy, EPA Region VI (Alternate for Mr. Gary Miller)
Mr. Eduardo Martinez, AFRPA Contractor
Ms. Abigail Power, TCEQ (Alternate for Mr. Mark Weegar)
Ms. Heather Ramon-Ayala, AFRPA Contractor
Ms. Carol Yzaguirre, Community Member

The meeting began at 6:36 p.m.

I. Introduction – Dr. David Smith

Dr. Smith began the meeting by welcoming RAB members and other attendees. Dr. Smith then reviewed the agenda items for the evening and the RAB meeting packets, which included:

- Draft 18 October 2005 Meeting Minutes
- Final 18 October 2005 BCT Minutes
- Documents to the TRS/RAB
- (2) TCEQ Letters to Mr. Antwine, Re: Class 2 Compliance Plan Modification
- September Action Item Report
- October Action Item Report
- Presentation I – 5 October 2005 East Kelly GWTP Spill
- Presentation II – Class 3 Modification to Compliance Plan 50310
- Media clipping, Re: Leon Creek Fish Kill

Ms. Hannapel gave a public comment regarding AFRPA mailings to the community, and provided AFRPA with a list of the following action items:

- Could you provide a copy of the recent mailing to RAB members?
- Were these 12,000 people informed of the recent leak of contaminated water that went into Six Mile Creek? If not, why not?
- Regarding the Zone 5 GWTP Fact Sheet which is on the AFRPA website:
 - Please provide documentation for the statement that chlorinated solvents break down into “carbon dioxide, water, and the mineral chloride.”
 - Please provide documentation that lactate, a substance used in enhanced bioremediation, is a “substance like vegetable oil.”
 - Please provide evidence for the statement that “Kelly is not the source of the PCE plume.”
- Regarding the Zone 4 Fact Sheet which is on the AFRPA website:
 - Please explain what is meant by “impermeable clay and rock” that separates the groundwater from the Edwards Aquifer. How can rock and clay be impermeable to water and substances that are dissolved in it?
 - Please comment on the Air Force documents mentioned by George Rice at the last RAB meeting indicating that contaminated groundwater has, in fact, already leaked into the Edwards Aquifer.
- In your mailings to the community, has the AF ever acknowledged the role of Mr. Armando Quintanilla in proving that the contamination had gone beyond the AF base and into the community? If not, why not?
- It appears from the fact sheets and community bulletins on your website that there are no dangers to the affected community. This may be why no one from the community is attending the RAB meetings. In your mailings to the affected population, have you included documents similar to the ATSDR and EPA statements on PCE and TCE and their role as probable carcinogens? If not, why not?
- Have there been mailings to the community that breakdown products such as vinyl chloride are now in the groundwater at sites such as E-3? If not, why not?

Mr. Silvas asked if other RAB members would like to make a comment.

Mr. Rodrigo Garcia gave public comment regarding poor government work and requesting resignations from everyone at AFRPA.

II. Administrative

A. Ms. Landez provided a BCT Update. Ms. Landez informed everyone no BCT meeting took place the day of this meeting, but that minutes from the 18 Oct 2005 BCT meeting were included in RAB packets.

B. Ms. Landez discussed recent documents to TRS/RAB. Documents which will be placed in the Co-Chair Library at the Environmental Health & Wellness Center following the meeting are as follows: 1) TCEQ Letter to AFRPA on Closure of Two AST at Bldg 53, Four VAST at Bldgs 375, 1417, 1544 & 1679. 2) TCEQ Letter to AFRPA on Site Inspections of AST Located at various buildings.

C. Action Item Reports from the 13 September 2005 TRS and 18 October 2005 RAB, and their attachments, were provided in RAB packets.

III. Spill Summary Report, East Kelly GWTP, Zone 4 – Bill Hall

Mr. Bill Hall provided a presentation regarding the spill at the East Kelly Groundwater Treatment Plant, Zone 4, that occurred 5 October 2005. Copies of the presentation were included in RAB packets.

Mr. Quintanilla requested a maintenance checklist used at Zone 4 GWTP. Ms. Hannapel also requested the same checklist.

Ms. LaGrange asked for salaries & maintenance costs allocated for the GWTP budget.

Mr. Quintanilla requested that TAPP funds be allocated to train RAB members to communicate with the Air Force and to train the Parliamentarian. Mr. Quintanilla asked that these TAPP funding requests be made an agenda item for the January 2006 RAB meeting.

IV. Class 3 Modification Update – Ms. Norma Landez

Ms. Norma Landez provided a presentation on the Class 3 Modification to Compliance Plan 50310. Ms. Landez stated that a mailer would be sent to RAB members informing them of the public meeting date for the Class 3 Modification.

Ms. La Grange requested that someone conduct a quality review of the packets prior to the meeting.

Mr. Quintanilla requested that EPA give a presentation at the January 2006 RAB meeting explaining why Kelly is not a Superfund site.

V. TAPP Update – Ms. Sonja Coderre

Ms. Coderre gave an update to the RAB regarding the award issued to Clearwater Revival to review the 2005 Semiannual Compliance Plan. Ms. Coderre mentioned that Mr. Silvas was speaking to Ms. Wilma Subra to provide a free presentation to the RAB at the 10 January 2006 RAB meeting.

Mr. Weegar suggested that if Ms. Subra was going to provide a free review of the 2005 Semiannual Compliance Plan, that the RAB should have Clearwater review another document. Mr. Silvas stated the RAB would receive both presentations to obtain a better summary.

Mr. Quintanilla asked to be provided a copy of the section on TAPP that one member can not receive training using TAPP funds.

VI. Meeting Wrap-Up

The next TRS will take place at 6:30pm, 13 December 2005 at the Environmental Health & Wellness Center, 911 Castroville Road.

The next RAB will take place at 6:30pm, 10 January 2006 in the cafeteria of Kennedy High School, 1922 South General McMullen.

VII. Meeting Adjournment

Ms. Hannapel moved for adjournment. Mr. Quintanilla seconded the motion.

The meeting adjourned at 8:52 p.m..

Robert Silvas
Community Co-Chair

Date

Adam Antwine
Installation Co-Chair

Date

December 13, 2005
Technical Review Subcommittee (TRS) Meeting
of the Kelly Restoration Advisory Board (RAB)
Environmental Health & Wellness Center
911 Castroville Road
San Antonio, Texas 78237

DRAFT Meeting Minutes

RAB Community Member Attendees:

Mr. Robert Silvas, Community Cochair
Mr. Galvan (alternate for Ms. Esmeralda Galvan)
Mr. Rodrigo Garcia
Ms. Coriene Hannapel
Ms. Henrietta LaGrange
Mr. Nazarite Perez
Mr. Michael Sheneman

RAB Government Member Attendees:

Gary Miller, Environmental Protection Agency (EPA), Region VI
Melanie Ritsema, San Antonio Metropolitan Health District (SAMHD)
Mark Weegar, Texas Commission on Environmental Quality (TCEQ)

Other Attendees:

David Smith, Facilitator
Don Buelter, Air Force Real Property Agency (AFRPA)
Todd Colburn, AFRPA Contractor
Kyle Cunningham, SAMHD (Alternate for Melanie Ritsema)
Alan Ferrell, SAMHD
Linda Kaufman, SAMHD
Eduardo Martinez, AFRPA Contractor
David Plylar
Abigail Power, TCEQ (Alternate for Mark Weegar)
Ellie Mae Wehner, TCEQ

The meeting began at 6:32 p.m.

I. Introduction – Dr. David Smith

Dr. Smith began the meeting by welcoming RAB members and other attendees. Dr. Smith then reviewed the agenda items for the evening and the RAB meeting packets, which included:

- Documents to the TRS/RAB at December TRS
- Documents to the TRS/RAB at November TRS signed acknowledgement from both cochairs
- AFRPA response letter to Ms. Hannapel's request for information regarding missed meeting packets

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

The meeting was conducted beginning at 10:00 a.m. on 13 December 2005 at the Air Force Real Property Agency Division C – Kelly (AFRPA/DC-K) office in San Antonio, Texas, Conference Room No. 1. BCT members and support personnel attendance status are shown below.

Name	Organization	Present	Absent
BCT Members			
Norma Landez	AFRPA/DC-K	X	
Gary Miller	Environmental Protection Agency (EPA) / Region 6	X	
Mark Weegar	Texas Commission on Environmental Quality (TCEQ) (Austin)	X	
Support Staff and Other Attendees			
Adam Antwine	AFRPA/DC-K		X
William Ryan	AFRPA/DC-K		X
Don Buelter	AFRPA/DC-K	X	
Leslie Brown	AFRPA/DC-K	X	
Luis Medina	AFRPA/DC-K	X	
Walter Peck	AFRPA/DC-K	X	
Greg Lyssy	EPA/Region 6		X
Abbi Power	TCEQ/Region 13	X	
Ellie Welner	TCEQ (Austin)	X	
Maurice Cooper	Lackland 37 CES/CEVR		X
Kalpesh Patel	Lackland 37 CES/CEVR	X	
Jacqueline Trevino	Lackland 37 CES/CEVR		X
Ken Kebbelle	US Army Corps of Engineers (USACE), Tulsa District		X
Dan Davis	USACE, Tulsa District	X	
Gary Martin	Greater Kelly Development Authority (GKDA)		X
Amy Whitley	AFRPA/DC-K (TEAM Integrated Engineering, Inc. [TEAM])	X	
Kevin Tarleton	AFRPA/DC-K (TEAM)	X	
Greg Braddy	Weston Solutions, Inc. (WESTON)	X	

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1.	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p><u>Zone 1</u> The Lackland AFB Remedial Action (RA) contractor (WESTON) provided brief overview of the Draft Corrective Measures Study (CMS) Investigation Report Environmental Zone 1 Sites; Lackland AFB, Texas - Volume I dated December 2005. Volume II of the CMS Investigation Report Environmental Zone 1 Sites; Lackland AFB, Texas will be the Risk</p>

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

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
I. (cont.)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p>Assessment portion of the report and will be ready for the Air Force's (AF) review in approximately one month.</p> <p>Volume I of the report includes all previous investigation work as well as the recently completed direct push technology (DPT) investigation conducted in November 2005. The DPT investigation involved the installation of 49 borings at six sites to determine landfill boundary conditions and validate assumptions of the landfill boundaries. The DPT soil samples were collected for surface and subsurface soils. WESTON stated there were no findings of "significance", with only metals such as beryllium, copper and aluminum, and PCBs sporadically detected in surface soils, indicating there are no areas of obvious contamination present. As a result of the November investigation, WESTON stated the boundaries of the landfills remain unchanged.</p> <p>WESTON posed the question to the TCEQ as to whether they could compare metals concentrations detected in the Zone 1 investigations to published TRRP background values for metals. The TCEQ stated that if a site specific background study of metal concentrations has been conducted, as it has at Kelly AFB, then a site specific background value must be used and not the TRRP generalized background values. WESTON asked the TCEQ in instances where a site specific background value for a particular metal such as aluminum, was not calculated, if the TRRP background value can be used. The TCEQ stated in such a case it would be appropriate to use the TRRP background value. The AF noted a site specific value for aluminum may have been calculated in the Final Tier2/Tier 3 Ecological Risk Assessment. The TCEQ responded if such was the case, the AF should utilize the aluminum value from the Ecological Risk Assessment.</p> <p>The EPA questioned whether the issue of selenium in Site D4 surface soils had been resolved. AFRPA responded the Zone 1 CMS will address the issue.</p>

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

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1. (cont.)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	<p><u>Zones 2 and 3</u> No project status updates to report, however, the Final Zones 2 and 3 CMS was mailed to TCEQ and EPA the week of 5 December for their review. As a result of the state approving the Final Tier 2/Tier 3 Ecological Risk Assessment on November 22, 2005, AFRPA will publish the Notice of Proposed Corrective Measures for ten sites in Zone 2 on Saturday, 17 December 2005 in the San Antonio Express News.</p> <p>The TCEQ questioned whether the Final Zones 2 and 3 CMS had been updated with regard to the Site MP remedy as noted in the response to TCEQ comments on the draft final document. AFRPA noted the Final Zones 2 and 3 CMS had been updated accordingly.</p> <p><u>Zone 4</u> Non-essential wells such as test injection wells are being plugged and abandoned. All wells are non-Compliance Plan wells.</p> <p><u>Zone 5</u> Shaw Environmental, Inc. will be sampling the 34th Street permeable reactive barrier (PRB) wells the week of 19 December 2005.</p> <p><u>Basewide:</u> All PRBs were sampled by AFRPA at the end of November.</p> <p>The TCEQ noted that analytical results from the sampling event conducted in January 2005 of Leon Creek indicated PCB concentrations in sediments collected downstream from an outfall of former Kelly AFB. This is the only sediment sample location near an outfall. No additional information was provided as to why the PCBs were detected in this sample; however, the PCB was detected at a concentration of an order of magnitude higher than any other previous or subsequent sampling event. AFRPA stated that the July 2005 sampling event was a more typical event than the January 2005 event as far as sediment concentrations were concerned. The TCEQ</p>

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

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
1. (cont.)	Landez, N.	Zone Managers	Zone Updates	Review of major project status for all IRP Zones.	Yes	asked if a rain event occurred near the time of the January 2005 event. AFRPA will review the possibility that a rain event caused the elevated PCB concentration.
2.	Landez, N.		Early Transfer and Permit Issues		Yes	<p>TCEQ stated it is the understanding of TCEQ that the Greater Kelly Development Authority (GKDA) wishes to take ownership of the non-realigned portions of the former Kelly AFB. To do so, the current Kelly AFB RCRA Hazardous Waste Permit (Permit) and Compliance Plan (CP) would have to be modified. The TCEQ also stated that in 1999, when the airfield and areas west were realigned from Kelly AFB (Kelly) to Lackland AFB (LAFB), the TCEQ met with Air Education Training Command (AETC) staff to encourage LAFB to apply for a Compliance Plan for LAFB, which would include the area realigned from Kelly to LAFB. The TCEQ stated they were met with resistance regarding this suggestion.</p> <p>Currently, the existing Kelly Permit and CP both list the Air Force as the owner and operator, however, the facility description for the Permit is different from the CP. The Permit describes the four RCRA regulated units and the CP is "fence to fence", describing the entire area encompassed by the former Kelly AFB, which includes the portion of Kelly realigned to LAFB.</p> <p>In order for Early Transfer to proceed, along with all requirements of the FOSET, a RCRA Permit and CP modification will have to occur. The Permit will be modified to list GKDA as the sole owner, with the USAF as the operator. The CP will be modified to list the USAF and the GKDA as co-owners, with the USAF remaining the operator. The issue with the CP modification is that GKDA would then be a "part" owner of a portion of LAFB (the area realigned in 1999, but included in the facility description of the CP). This would leave two options as possible solutions: Option 1 - LAFB applies for their own Permit and CP; or Option 2 - an attachment is included to the facility description in the CP to indicate which portions of the property included in the CP to indicate which are owned by the USAF and which are owned by the GKDA.</p>

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

Item #	Lead	Support	Discussion Topic	Comments	Discussion Topic Concluded?	Disposition/Action Items
2. (cont.)	Landez, N.		Early Transfer and Permit Issues		Yes	<p>Option 2 would be the timeliest solution, however this solution would effectively prevent privatization of the clean-up at the former Kelly AFB. GKDA must be the operator of the CP if they wish to privatize clean-up. Although it is possible for more than one owner to exist on the CP or Permit, there can only be one operator. For the GKDA to accomplish the privatization of the clean-up at the former Kelly AFB, LAFB would be required to acquire a Permit and CP, listing them as owner and operator of the portion of Kelly realigned to LAFB.</p> <p>The TCEQ also stated if GKDA were to acquire their own permit and CP, they would be responsible for posting financial assurance relating to the clean-up. In addition, regardless of whether they are co-owners on the current Permit and CP or sole owner on a new Permit and CP, when the GKDA desires to sell property within the facility description of either the Permit or CP, the buyer would also have to become a co-owner on the Permit or CP. TCEQ raised the concern that the GKDA may not fully understand the potential liabilities to being an owner on the Permit and CP.</p>
3.	Zone Managers		Review of documents to be submitted for regulatory review within the next 90 days; Status of documents already in review		Yes	<p>The TCEQ inquired whether the GKDA has sent a letter to the Governor's office stating their desire for early transfer of the remaining portions of the former Kelly AFB. The AF was unaware if the request had been sent, but stated they would inquire if this had been done.</p> <p>The AF provided a schedule for the transfer of the Test Cells parcel.</p> <p>The January 2006 Semi Annual Compliance Plan Report will be submitted in January 2006.</p> <p>The Draft Final CMS Investigation Report; Environmental Restoration of Zone 1 Sites Lackland AFB, Texas - Volume I, December 2005 will be submitted in February 2006.</p>



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

JAN 10 2006

Dear Kelly Restoration Advisory Board Members

The following is an action items report for the 13 December 2005 Kelly Restoration Advisory Board (RAB) Technical Review Subcommittee (TRS) meeting.

1. Ms. Hannapel would like AFRPA to identify a point-of-contact for each of the responses provided. She also asked that a background on each of the points-of-contact be provided.

All information provided by the Air Force Real Property Agency in response to questions and requests for information from community members are U.S. Air Force responses. The AFRPA/DC-Kelly personnel take the responsibility of providing timely and accurate information to the community seriously and work together to research and compile information in response to queries.


2. Mr. Garcia would like to know if all the radioactive waste had been removed from the golf course.

The golf course at the former Kelly Air Force Base (AFB) has been realigned to Lackland AFB. For more information regarding actions taken at the golf course, please contact Lackland AFB.

3. Mr. Silvas requested AFRPA respond to Mr. Lynch's findings upon delivery of the final presentation and report.

AFRPA will provide a copy of the response to Mr. Lynch's findings once it is completed, prior to the next RAB meeting occurring 11 April 2006.

Thank you for your continued interest in the environmental restoration program at the former Kelly AFB. If you have questions, please contact (210) 925-0956.

Sincerely,

ADAM G. ANTWINE
Senior Representative

d to my jog- went on the story about a passing stopped a few vntown Hous- ants. o tell them I at happened," o worry about Houston, but aid he hadn't seven years, y to turn. and ran," he

A second train took him to near Shreveport, where his story about being a Katrina refugee compelled some people at a paper mill to give him \$21, a shower and a ride to a truck stop. Then he hitched a ride to Shreveport.

The self-described former drug addict and alcoholic used the money for some food, "a pint of Seagrams and a pack of beer," he said.

When he was on the phone outside a store, his back to the street, he heard a car screech to a stop.

"I knew," Thompson said. "I

turned around and there was five vehicles with doors flying open with guns and shotguns coming out, and I knew it was over."

Thompson said he expects to pay for his escape by getting no leniency from Texas courts in his legal appeal. He said prison officials asked if he would try another escape.

"I said, I don't think there's any holes in your security here," he said. "I'm pretty much resolved to my fate. Concrete box 23 hours a day. Just sit in there and think about how they're going to kill you."

an Indian reservation, the law firm reported, and Williamson was fined \$100,000 by the National Association of Securities Dealers and barred from

recall discussing the contract, but he did attend an Aug. 9 meeting with only two other board members, board chair-

would not have done that contract," he said. ecallen@express-news.net

Age focuses on Perry in his bid

7 for a slow re- funding prob- the governor plan influenced rs with whom a Caribbean years ago, in- u of Houston, the country's laborships. funding plan bottled water;

Bob Gammage calls himself "pro-choice, pro-guns, pro-Bill of Rights, pro-family and pro-privacy."

"but it didn't put any tax on alcoholic beverages — imagine that," Gammage said. "We don't need a state govern-

ment run from yachts," said Gammage, sitting in front of a large photograph of a yacht. "As governor of Texas, I will make policy in the state Capitol, consulting with taxpayers and consumers, and I won't be making it in the Bahamas."

Black, the Perry spokesman, said, "Texans are eagerly awaiting Mr. Gammage's detailed school finance plan."

gscharrer@express-news.net

Notice of Proposed Corrective Measures

The Air Force Real Property Agency/Division C-Kelly (AFRPA/COO-K) located at the former Kelly Air Force Base, 143 Billy Mitchell Boulevard, San Antonio, Bexar County, Texas, has hereby given notice to the Texas Commission on Environmental Quality (TCEQ) regarding the closure of the sites listed below. The sites have been closed in accordance with the requirements of Compliance Plan No. CP-50310. The corrective measures conducted pursuant to closure of the sites are detailed in the closure reports listed in the site descriptions below. Soils and groundwater at Site S-9, Site FC-2, Site SA-2, and soil only at the former Industrial Wastewater Treatment Plant (IWTP), Site CS-2, Site S4-A, Site SA-3, Site SA-4, Site SD-2 and the Zone 3 Industrial Wastewater Collection System (IWCS), have been closed to Risk Reduction Standard No. 2 - Closure/Remediation to Health-Based Standards and Criteria. Contaminants allowed to remain in place do not exceed health-based clean up levels as specified in 30 Texas Administrative Code (TAC) §335.556. No post closure care or engineering or institutional control measures are required at the sites. Deed certifications of the sites will be conducted following the completion of the 60 day public comment period.

Jet Engine Test Cell Complex (S-9), (Solid Waste Management Unit (SWMU) 25, Air Force Site No. ST010) - Site S-9 consists of the Jet Engine Test Cell Buildings 650, 651 and 652; the former aqua-fuels system northeast of Building 652; and the former sludge-spreading area west of Building 652. The period of use for the former aqua-fuels system was from 1945 to 1985, and operations at the Jet Engine Test Cell complex began in the early 1950's. Sludge from the former Industrial Wastewater Treatment Plant (IWTP) was spread in the area west of Building 652 for an unknown period of time. The closure activities conducted at the site are detailed in the Draft Final RCRA Facility Investigation (RFI) for Site S-9 (Jet Engine Test Cell Complex, SWMU 25), February 2003.

Fire Control Training Area (FC-2), (SWMU 27, Air Force Site No. FT024) - Site FC-2 is an inactive fire training area used by the former Kelly Air Force Base between 1950 and 1981. During the 31 years of operation, fire training exercises were conducted two to four times a year. Fires were ignited on a simulated aircraft fuselage using waste petroleum, oils, and lubricants (POLs), and extinguished through the use of a water/protein mixture of aqueous film forming foam. The closure activities at the site are detailed in the Resource Conservation Recovery Act (RCRA) Closure Report, Fire Control Training Area FC-2, Former Kelly AFB, Texas, November 2003.

Combined Site (CS-2), (Air Force Site No. SS042) - Site CS-2 has been used as a landfill, a fire control training area, engine test cell facility, and a drum storage area. The closure activities at the site are detailed in the Final Zone 2 Six Sites Soils Closure Investigation Report, Former Kelly AFB, Texas, October 2002, and in Section 7 Change for Site CS-2 and Request for Closure of the Tank Holding Area, September 2003, and in the information contained in the March 10, 2004 and the August 27, 2004 response to TCEQ comment letters.

Sludge Spreading Area (SA-3), (SWMU 32, Air Force Site No. SS031) - Site SA-3 was used prior to 1969 for spreading sludge from the former IWTP for air-drying. The closure activities at the site are detailed in the Final Zone 2 Six Sites Soils Closure Investigation Report, Former Kelly AFB, Texas, October 2002 (modified by corrections to Section 9.7 in letter correspondence to TCEQ dated April 22, 2003).

Old Sludge Drying Beds (SD-2), (SWMU 44, Air Force Site No. WP034) - Site SD-2 received sludge pumped from the IWTP to the digester in the 1940's and 1950's. In 1984, a sludge dewatering facility began operating at this site. From 1984 to 2001 filter cake generated by the facility was loaded into trucks and trailers and disposed of offsite at a permitted facility. Minor amounts of organic and inorganic contaminants had been detected in the soils at the site. The closure activities at the site are detailed in the Final Zone 2 Six Sites Soils Closure Investigation Report, Former Kelly AFB, Texas, October 2002, and in Section 11 Change for Site SD-2 and Request for Closure of the Sludge Dewatering Facility, November 2002 Zone 2 Six Sites Soils Closure Report, and by information contained in the August 9, 2004 response to TCEQ comment and the October 28, 2004 revision.

Hazardous Waste Storage Area (S4-A), (SWMU 16, Air Force Site No. SS028) - Site S4A served as a storage area for hazardous waste from 1972 to 1981. The closure activities at the site are detailed in the Final Zone 2 Six Sites Soils Closure Investigation Report, Former Kelly AFB, Texas, October 2002.


Sludge Spreading Area (SA-4), (SWMU 32, Air Force Site No. SS032) - Site SA-4 was used once or twice per year from 1968 through 1974 to spread sludge from the Site SA-2 Industrial Waste Sludge Lagoon. Soils excavated during construction of the Environmental Process Control Facility were stock-piled at this site. The closure activities at the site are detailed in the Final Zone 2 Six Sites Soils Closure Investigation Report, Former Kelly AFB, Texas, October 2002.

Sludge-Drying Lagoon (SA-2), (Air Force No. SS030) - Site SA-2 was in operation from 1962 to 1980. Site SA-2 was used to receive sludge from the IWTP when Site SD-1 drying beds were not in operation. The closure activities at the site are detailed in the Final Unit SA-2 RCRA Closure Report, Kelly AFB, Texas, February 2000.

Zone 3 Industrial Wastewater Collection System (IWCS), (SWMU No. 246, Air Force No. SS044) - The Industrial Wastewater Collection System (IWCS) historically received industrial discharge from operations in various facilities operations for conveyance to the Environmental Process Control Facility (EPCF). The closure activities are detailed in the Revised Final Closure Report Industrial Wastewater Collection System Final Closure, Former Kelly Air Force Base, Texas, June 2004.

Industrial Wastewater Treatment Plant (IWTP), (SWMU 122-159, Air Force No. Site No. SS002) - The IWTP began receiving industrial waste in the early 1970's. In 1984 the sludge dewatering facility and a second upgrade were added to the IWTP. Operations ceased in 1988 when the new EPCF was brought on line. The closure activities are detailed in the Final Zone 2 Six Sites Soils Closure Investigation Report, Former Kelly AFB, Texas, October 2002.

The purpose of this notice is to give members of the public the opportunity to submit written comments on the proposed corrective measure(s) in accordance with TCEQ policy effective August 1, 2001. Comments must be submitted within 60 days of the date of publication of this notice to: Manager, Corrective Action Section, Mail Code MC-127, Remediation Division, Texas Commission on Environmental Quality P.O. Box 13087, Austin, Texas 78711-3087. Copies of the corrective action measure(s) documents are available for public inspection at the Austin office of the TCEQ located at Technical Park Center, Building D, Room 109, 12118 North IH-35, Austin, and at the TCEQ Regional Office located at 14250 Judson Road, San Antonio.



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CADILLAC CTS ed, 4K Miles, #320A6	\$33,724	'02 CADILLAC DEVILLE #323A5, White Diamond, One Owner, Must See!	\$17,847
CADILLAC ESCALADE AWD A6, White Diamond, al Interior, 6 Yr/100K Mile Warranty Incl.	\$32,973	'02 CADILLAC DEVILLE Sterling, Factory Warranty Included, #941A5	\$16,954
CADILLAC CTS 21, Moonstone, 6-Yr/100K Warranty Included	\$29,970	'02 CADILLAC SLS #621B5, Bronze Mist, Priced To Sell!	\$16,757
CADILLAC CTS A5, Blue Chip, 17K Miles, Cared For!	\$29,875	'00 CADILLAC ESCALADE AWD Silver Sand, 37K Miles, One Owner, #371A6	\$16,552
CADILLAC SRX man, Priced For Christmas, #613A5	\$28,785	Manager Specials	
CADILLAC ESCALADE AWD 1 w/Neutral Leather, Certified Warranty Incl., #33296	\$28,775	'04 LEXUS ES330 Sage, Low Miles, one owner, #33556	\$27,876
CADILLAC CTS 3B5, Cannon Pearl, 100K Warranty Incl!	\$26,568	'02 FORD EXPLORER Sterling, Graphite Interior, #546B5	\$11,922
		'99 CHRYSLER LHS #354a6, shade, leather interior	\$7,995
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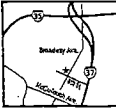
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Footprints in wood and attached the pieces to their sandals, McCrary said, but such tricks can be cumbersome, slow and almost too uniform to really get the job done.

"Any time you see regularity in nature, it probably is not going to be natural," he said.

Footprints aren't the only sign. McCrary and Galaviz said they can track a group by spotting overturned rocks, revealing soil that is darker where the rock was sitting. Broken branches and trash dropped along the way also can help.

When the crossers in Fabens set off the underground sensor, agents found their footprints within minutes. The fresh trail led them along a maze of deep

problems

meteorologist with the National Weather Service office in New Braunfels. Predicted gusty winds stayed north of the area, he said.

Sunday was a different story though.

"If anyone was trying to use up leftover fireworks, it would have been ill-advised and dangerous," Oaks said. He expects conditions will remain too dangerous for fireworks throughout the week.

"It's looking pretty rough all the way out in our seven-day forecast," he said.

"Every two to four days another trough will come through, and that brings winds that can spread fire."

meenat@express-news.net
Staff Writer Roger Croteau in New Braunfels contributed to this report.

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nd safe and
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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN A CLASS 3 MODIFICATION TO COMPLIANCE PLAN

COMPLIANCE PLAN NO. CP-50310

APPLICATION. United States Department of the Air Force, AFRPA/DC-Kelly, 143 Billy Mitchell Boulevard, Suite 1, San Antonio, Bexar County, Texas, 78226-1816, the Air Force Real Property Agency, applied to the Texas Commission on Environmental Quality (TCEQ) for a Class 3 modification to Compliance Plan No. CP-50310. The modification requests authorization to incorporate a Corrective Measures Implementation Work Plan for Zone 4 and Zone 5 at the former Kelly Air Force Base. The facility is located approximately seven miles southwest of the center of San Antonio, at the intersection of U.S. Highway 90 and Interstate Highway 35, San Antonio, Bexar County, Texas. The application was submitted to the TCEQ on October 7, 2005. The Class 3 modification application is available for viewing and copying at the San Antonio Public Library, Government Documents Section, 600 Soledad Street, San Antonio, Bexar County, Texas.

The TCEQ executive director has determined the application is administratively complete and will conduct a technical review of the application. After completion of the technical review, the TCEQ will issue a Notice of Application and Preliminary Decision.

PUBLIC COMMENT / PUBLIC MEETING.

United States Department of the Air Force will hold a public meeting on the application at the following date, time, and location:

DATE: JANUARY 11, 2006
TIME: 6:00 P.M. to 7:30 P.M.
LOCATION: GREATER KELLY DEVELOPMENT AUTHORITY
143 BILLY MITCHELL BOULEVARD, SUITE 6
SAN ANTONIO, TEXAS 78226

In addition, you may submit public comments or request that the TCEQ hold a public meeting about the application. The purpose of a public meeting is to provide the opportunity to submit comments or to ask questions about the application. The TCEQ may hold a public meeting if the executive director determines that there is a significant degree of public interest in the application, if requested in writing by an affected person, or if requested by a local legislator. A public meeting is not a contested case hearing.

Written public comments and requests for public meeting must be submitted to the Office of the Chief Clerk, MC 105, TCEQ, P.O. Box 13087, Austin, TX 78711-3087.

ADDITIONAL NOTICE. After technical review of the application is completed, the executive director may prepare a draft permit and will issue a preliminary decision on the application. Notice of the Application and Preliminary Decision will be published and mailed to those who are on the county-wide mailing list or the mailing list for this application. That notice will contain the final deadline for submitting public comments.

OPPORTUNITY FOR A CONTESTED CASE HEARING. After the deadline for public comments, the executive director will consider the comments and prepare a response to all relevant and material, or significant public comments. The response to comments, along with the executive director's decision on the application, will be mailed to everyone who submitted public comments or who requested to be on the mailing list for this application. If comments are received, the mailing will also provide instructions for requesting reconsideration of the executive director's decision and for requesting a contested case hearing. A contested case hearing is a legal proceeding similar to a civil trial in state district court.

A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decision on the application. Further, the Commission will only grant a hearing on issues that were raised during the public comment period and not withdrawn.

MAILING LIST. In addition to submitting public comments, you may ask to be placed on a mailing list to receive future public notices mailed by the Office of the Chief Clerk. You may request to be added to: (1) the mailing list for this specific application; (2) the permanent mailing list for a specific applicant name and permit number; and/or (3) the permanent mailing list for a specific county. Clearly specify which mailing list(s) to which you wish to be added and send your request to the TCEQ Office of the Chief Clerk at the address above. Unless you otherwise specify, you will be included only on the mailing list for this specific application.

INFORMATION. If you need more information about this permit application or the permitting process, please call the TCEQ Office of Public Assistance, Toll Free, at 1 800 687 4040. General information regarding the TCEQ can be found at our web site at www.tceq.state.tx.us. The permittee's compliance history during the life of the permit being modified is available from the Office of Public Assistance.

Further information may also be obtained from United States Department of the Air Force at the address stated above or by calling Ms. Norma Landez, BRAC Environmental Coordinator at (210) 925-3100, extension 311.

Issued: December 14, 2005

Advertorial

Environmental restoration activities continue at Kelly

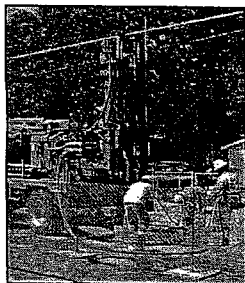
Kelly: Then and Now

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

The Environmental Program at Kelly

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

In 1988, along Quintana Road, the Air Force first detected the contamination in the shallow groundwater. Since then, the Air Force has evaluated



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

and implemented a variety of innovative cleanup techniques to remove and/or treat the contamination of the soil and shallow groundwater. Systems designed to contain the plume were first installed to prevent additional migration of contaminants

off the base. The Air Force, in order to remove contaminants, employed innovative technologies such as using micro-organisms to break down chemicals, and pumping contaminated water from the shallow zone to the groundwater treatment plant where it is centrally treated and then discharged into Leon and Six Mile creeks – the natural discharge areas for the shallow groundwater zone. The Air Force is currently installing the final groundwater remediation system, a permeable reactive barrier, near Malone Avenue. This PRB, like the six others installed throughout the Kelly area, is made of iron filings which react with the chemicals in the shallow groundwater, causing them to breakdown into less-harmful by-products.

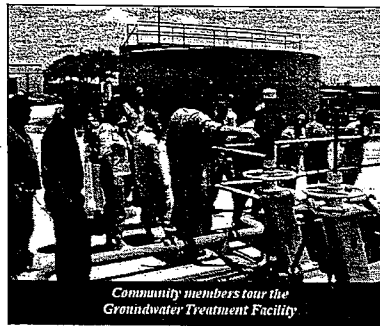
The Air Force will continue to operate these cleanup systems until the shallow groundwater meets TCEQ's regulatory standards. TCEQ and EPA provide regulatory oversight of the Air Force throughout this process to ensure remedial actions are effective and continue until regulatory standards are met.

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

Addressing Health Concerns

Despite numerous studies unable to link past or present Kelly activities to the health concerns of the community, the Air Force entered into a cooperative

agreement with the San Antonio Metropolitan Health District in 2002. The agreement provides \$5,000,000 in funding over a ten year period. Funding provided allows the Public Center for Environmental Health to develop and conduct health-related research studies.



Community members tour the Groundwater Treatment Facility

To date, PCEH has conducted several studies to monitor air for possible contamination during environmental cleanup activities. PCEH also responded to community requests for a study to test homegrown produce for contaminants. Kelly area fruits and nuts were determined safe to eat. PCEH also conducted air monitoring and found no contamination during Air Force construction and installation of four PRBs within the community that work to clean the shallow groundwater.

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

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

Reaching out to the Community

To ensure community members receive the most complete and timely information regarding the environmental and property transfer programs, the Air Force employs a number of outreach initiatives at the former Kelly AFB. Central to these is the Kelly Restoration Advisory Board. Created in 1994 to seek and promote community involvement in the Kelly cleanup program, the RAB meets quarterly to discuss progress, provide input, review plans and suggest projects. RAB advice is factored into the environmental cleanup program. The Air Force also provides an annual informational mailing to the surrounding community, partners with various community groups, gives tours and attends neighborhood association meetings.

Working Today for a Better Tomorrow

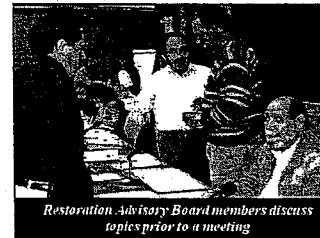
A key part of San Antonio's future, KellyUSA generates \$2.5 billion annually through a combined workforce of 12,000 jobs. With a total of 1,887 acres of former Kelly AFB land in reuse at KellyUSA and 96 percent of available industrial space currently under management of the Greater Kelly Development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

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

Join the Kelly Restoration Advisory Board!

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

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



Restoration Advisory Board members discuss topics prior to a meeting

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

- Increasing community understanding
- Reviewing plans and documents
- Providing advice
- Acting as a resource for the community

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

Kelly Restoration Advisory Board Meetings

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

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

Contact Information

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

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

Actividades de restauración ambiental continúan en Kelly

Kelly: Pasado y Presente

Por más de 80 años, la antigua base aérea de Kelly ha proporcionado servicios de aviación militar, entrenamiento, y provisiones y mantenimiento para la Fuerza Aérea. La base fue colocada en la lista de Cierre y Realineamiento de Bases Militares (BRAC, por sus siglas en inglés) en 1995. Parte de la base fue transferida a la base aérea de Lackland, mientras el resto fue cerrado el 13 de julio del 2001. Desde entonces, la Agencia de Bienes Inmuebles (AFRPA, por sus siglas en inglés), ha estado manejando los programas de restauración del medio ambiente y transferencia de propiedad en Kelly. La AFRPA trabaja con la Agencia de Protección Ambiental de EE.UU. (EPA, por sus siglas en inglés) y la Comisión de Calidad Ambiental de Texas (TCEQ, por sus siglas en inglés) asegurando la limpieza de la contaminación para poder transferir la propiedad a Greater Kelly Development Authority (GKDA, por sus siglas en inglés) - la autoridad que administra y opera Kelly USA. Hoy en día, Kelly USA opera un aeropuerto de multi-uso y parque de industria y negocios.

El Programa Ambiental en Kelly

Durante los años activos de Kelly, la base, fue primeramente utilizada como un centro de fabricación y mantenimiento. Aunque la Fuerza Aérea implemento medidas de precaución necesarias para utilizar los químicos efectivamente, los impactos negativos no fueron descubiertos hasta después de muchos años de operación. Como resultado de la practica aprobada de deshechar durante la operación de la base, resultado en desparpames y fugas de gasolina de aviones que contenían solventes clorinados. Estos solventes, los cuales fueron utilizados para desgrasar partes metálicas de aviones, contaminaron el agua subterránea dentro y fuera de la base.

En 1988, la Fuerza Aérea detecto contaminantes en el agua subterránea de poca profundidad por la calle Quintana.

Desde entonces, la Fuerza Aérea a evaluado y implementado una variedad de técnicas para remover y tratar la contaminación de la tierra y el agua subterránea de poca profundidad.

Sistemas diseñados para contener la contaminación fueron primeramente instalados para prevenir la migración de contaminantes fuera de la base. Después, la Fuerza Aérea empezó a usar tecnologías

innovadoras para remover los contaminantes. Estas tecnologías incluyeron el uso de microorganismos para degradar los químicos, y el uso de plantas de tratamiento del agua que descargan dentro del arroyo Leon Creek y el arroyo Six Mile Creek. Hoy, la Fuerza Aérea está instalando el último sistema de remediación del agua subterránea de poca profundidad. Este sistema consiste de una barrera permeable reactiva (PRB, por sus siglas en inglés), colocada en la avenida Malone. Esta PRB, como las otras seis que fueron instaladas alrededor de la base, utiliza hierro que reacciona con los químicos en el agua, causando la degradación de los químicos y convirtiéndolos en productos menos dañinos.

La fuerza aérea continuara la operación de estos sistemas hasta que el agua subterránea de poca profundidad satisfice los requisitos regulatorios de la TCEQ. La TCEQ y la ERA supervisan la Fuerza Aérea durante el proceso de limpieza ambiental para asegurar que las acciones de remediación sean eficaces y continuarán hasta que la fuerza aérea satisfice todos los requisitos regulatorios.

El agua potable de la comunidad alrededor de Kelly y de San Antonio viene del acuífero Edwards y no de la zona de agua subterránea de poca profundidad. La zona del agua de poca profundidad se encuentra 30 pies bajo de la superficie y el acuífero Edwards se encuentra 1,500 pies debajo de esta zona. Estas dos zonas están separadas por aproximadamente un cuarto de milla de arcilla, la cual es relativamente impermeable. Esta separación asegura que el agua potable no sea contaminada por el agua subterránea de poca profundidad.

Respondiendo a las Preocupaciones de Salud

Aunque se han hecho muchos estudios que no han relacionado las actividades que ocurrieron en Kelly con los efectos a la salud, la Fuerza Aérea formó un acuerdo con el departamento de salud de San Antonio en el 2002. El acuerdo provee financiamiento de 5 millones de dólares sobre un periodo de diez años. Este financiamiento permite que el Centro Público para la Salud Ambiental (PCEH, por sus siglas en inglés) pueda crear y llevar a cabo estudios de investigación sobre la salud.

A esta fecha, el PCEH ha llevado a cabo varios estudios para monitorear el aire en caso de que exista la posibilidad de contaminación durante actividades de limpieza medioambiental.



Miembros de la comunidad en un tour en una planta de tratamiento de agua

por la posibilidad de que estén contaminadas. Los resultados concluyeron que la cosecha de tales frutas y verduras mostraban ser libres de contaminaciones y están listas para consumir.

El PCEH también llevo a cabo monitoreo del aire durante la construcción e instalación de cuatro PRBs en la comunidad.

Adicionalmente, la Fuerza Aérea y el departamento de salud de San Antonio identificaron y sellaron posos de agua subterránea de poca profundidad. Aunque la mayoría de los residentes usaron estos posos privados para la agricultura, 75 posos fueron sellados para asegurar la protección de la salud humana y el medioambiente. La Fuerza Aérea y el departamento de salud de San Antonio han trabajado extensivamente para asegurar que los miembros de la comunidad entiendan que el agua potable proporcionada por SAWS (por sus siglas en inglés) viene del acuífero Edwards.

El Centro de Salud y Bienestar Medioambiental (EHWC - por sus siglas en inglés), junto con financiamiento proporcionado por la Agencia para Substancias Tóxicas y el Registro de Enfermedades (ATSDR - por sus siglas en inglés), provee exámenes de salud gratis e información a la comunidad. Hoy, casi 2,000 exámenes de salud se han realizado a la comunidad en forma gratuita.

Informando a la Comunidad

Para asegurar que los miembros de la comunidad reciban la información más completa y oportuna sobre los programas del medio ambiente y de transferencia de propiedad, la Fuerza Aérea utiliza varios métodos de comunicación en Kelly. Al medio de estos métodos se encuentra la Junta Asesora para la Restauración de Kelly (RAB, por sus siglas en inglés). Creada en 1994 para aumentar la participación de la comunidad, la RAB se junta cada 3 meses para discutir el progreso de la limpieza, proveer opiniones y consejos, revisar planes, y sugerir proyectos potenciales. La Fuerza Aérea también envía información anualmente a la comunidad, se asocia con varios grupos comunitarios, provee excursiones para conocer la base y los sistemas de limpieza, y atiende juntas de las asociaciones comunitarias.

Trabajando Hoy para un Mejor Mañana

Kelly USA es una de las partes más importantes del futuro de San Antonio. Kelly USA genera aproximadamente \$2.5 billones de dólares anualmente con una fuerza de trabajadores aumentando a 12,000 trabajos. Kelly USA reutiliza un total de 1,887 acres de terreno que pertenecía a la base de Kelly y 96 por ciento de espacio industrial bajo el manejo de GKDA, la urbanización promueve el crecimiento en el suroeste de San Antonio.

Utilizando constante y honesta comunicación con la comunidad y las agencias regulatorias federales y del estado, la implementación de tecnologías de remediación ambientales, transferencias de propiedad y la urbanización, y un compromiso a asegurar la salud y el medio ambiente, la cerrada y urbanización de la antigua base aérea de Kelly será una historia exitosa.

Únete a la Junta Asesora para la Restauración de Kelly

Formada en 1994, la Junta Asesora para la Restauración de Kelly (RAB, por sus siglas en inglés) facilita la participación publica en la limpieza ambiental de la antigua base aérea de Kelly. La RAB de Kelly consiste de un representante de la Fuerza Aérea, la Agencia de Protección Ambiental de EE.UU. (EPA, por sus siglas en inglés), la Comisión de Calidad Ambiental de Texas (TCEQ, por sus siglas en inglés), la Greater Kelly Development Authority (GKDA, por sus siglas en inglés), y el Distrito Metropolitano de Salud de San Antonio, aparte de 16 miembros de la comunidad. Generalmente, 8 posiciones comunitarias se terminan al final de cada año. Esto les permite la oportunidad a nuevos miembros de participar en la junta.

Los miembros comunitarios de la RAB de Kelly son elegidos para servir un periodo de dos años, empezando en enero y terminando en diciembre del próximo año.

Los miembros comunitarios de la RAB sirven voluntariamente sin compensación y cuentan con revisar documentos, someter comentarios constructivos, y asistir las juntas.



Miembros de la Junta Asesora para la Restauración de Kelly (RAB)

Los miembros comunitarios de la RAB han contribuido en el programa de limpieza medioambiental de la Fuerza Aérea desde 1994 en las formas siguientes:

- Aumentando el entendimiento de la comunidad sobre el programa de limpieza ambiental
- Revisando planes y documentos
- Proveyendo opiniones y consejos a la Fuerza Aérea
- Actuando como un recurso para la comunidad

Miembros de la comunidad interesados en participar en la RAB de Kelly deben comunicarse con la Agencia de Bienes Inmuebles (AFRPA) de la fuerza aérea para obtener más información y una solicitud de membresía.

La Junta Asesora para la Restauración de Kelly

Reúnase con nosotros cada segundo martes de enero, abril, julio, y octubre a las 6:30 p.m.!

Cafetería de la Preparatoria Kennedy
1922 S. General McMullen
San Antonio, TX 78226

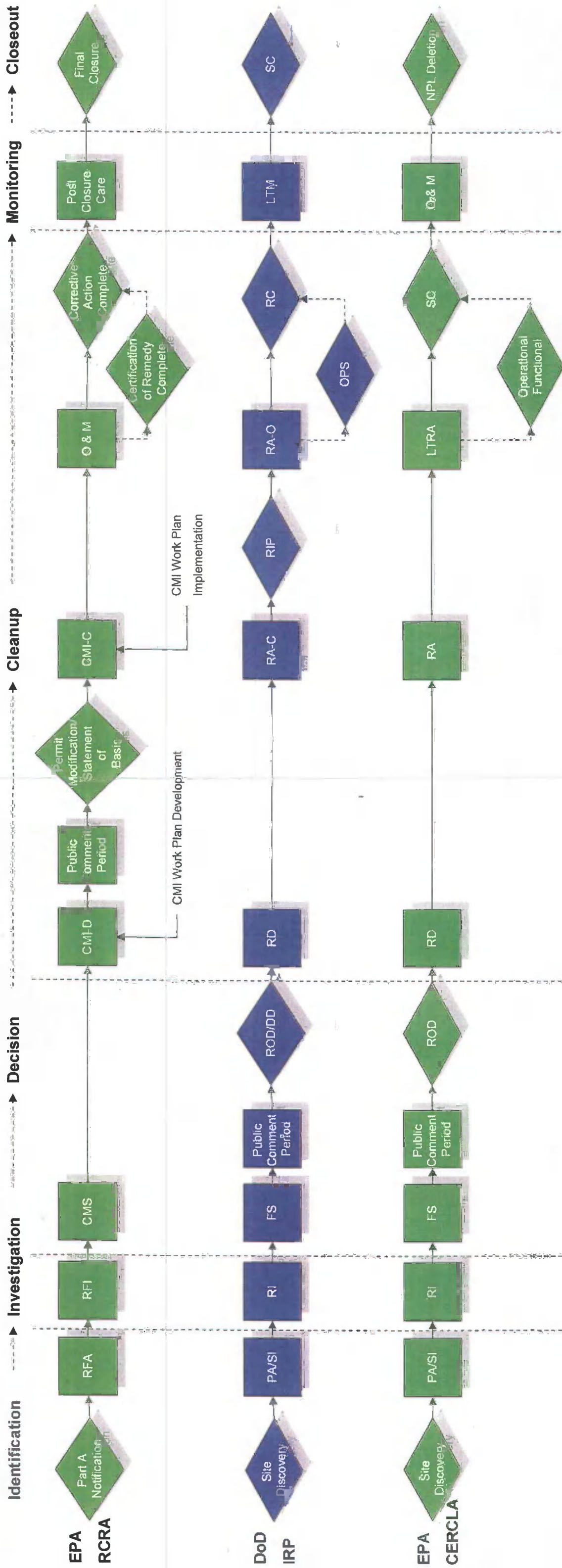
Información de Contacto

Air Force Real Property Agency
143 Billy Mitchell Blvd., Suite 1
San Antonio, TX 78226-1816
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Repositorio de Información

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600 North Soledad
San Antonio, TX 78205
Local (210) 204-2500 • www.sanantonio.gov/library

Comparison of RCRA, IRP, and CERCLA Phases and Milestones



Legend

CMI-C	Corrective Measures Implementation	RA-C	Remedial Action Construction
CMI-D	Corrective Measures Implementation Design	RA-O	Remedial Action Operation
CMS	Corrective Measures Study	RC	Response Complete
DD	Decision Document	RD	Remedial Design
FS	Feasibility Study	RFA	RCRA Facility Assessment
LTM	Long - Term Monitoring	RFI	RCRA Facility Investigation
LTRA	Long - Term Response Action	RI	Remedial Investigation
NPL	National Priorities List	RIP	Remedy in Place
O & M	Operations and Maintenance	ROD	Record of Decision
OPS	Operating Properly and Successfully	SC	Site Completion for Entire Installation (CERCLA)
PA	Preliminary Assessment	SC	Site Closeout (IRP)
RAIP	Remedial Action in Place	SI	Site Inspection

References

- EPA RCRA 40 CFR Chapter 1
- DoD IRP Department of Defense Reporting Conventions (Restoration Management Information System)
- EPA CERCLA National Oil and Hazardous Substances Pollution Contingency Plan; EPA Reporting Guidance

Community Involvement Plan for the Former Kelly Air Force Base

April 2004



U.S. AIR FORCE

Air Force Real Property Agency/Division C-Kelly
San Antonio, TX

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SECTION 1: OVERVIEW OF COMMUNITY INVOLVEMENT PLAN

The Air Force Real Property Agency/Division C-Kelly (AFRPA/DC-Kelly) developed this Community Involvement Plan (CIP) to facilitate two-way communication with the community surrounding the former Kelly Air Force Base and to encourage community involvement in site activities. AFRPA will utilize the community involvement activities outlined in this plan to keep residents continuously informed and provide opportunities to be involved. This CIP replaces the Kelly Community Relations Plan released in 1996.

This section presents an overview of the Community Involvement Plan. Section 2, Capsule Site Description, provides site history, description, and an overview of cleanup activities. Section 3, Community Background, provides a community profile, history of community involvement, community concerns, communication needs and responses to them. Section 4, Community Involvement Plan, presents the projected activities intended to respond to community concerns and communication needs. The appendices provide information on available resources and a description of the community interview methodology.

SECTION 2: CAPSULE SITE DESCRIPTION

2.1 Site History

Camp Kelly, the first military air base in Texas, was established in 1917. Originally a training facility, the base's emphasis quickly shifted to depot-level logistics and aircraft maintenance. By the time the Base Realignment and Closure (BRAC) Commission ordered Kelly to be closed and realigned in 1995, the base covered nearly 4,000 acres, with an additional 600 acres of off-base property leased as buffer zones at each end of the runway.

During its 83 years of use as a military aviation, training, supply, and maintenance complex, several areas of Kelly were environmentally impacted. The type of contamination found at Kelly is typical of manufacturing and maintenance facilities—primarily perchloroethylene (PCE) and trichloroethylene (TCE), both of which were used on base to degrease engine parts. These contaminants were found in soils, and in the shallow groundwater both on base and in off-base plumes, due primarily to spills and leaks.

In 1995, Kelly was included on the list of military facilities scheduled for closure or realignment, under the authority of the Base Closure and Realignment Act of 1988 and the Defense Base Closure and Realignment Act of 1990.

The Kelly closure has been the most complex to date under BRAC, since it involved both closure and realignment along with uninterrupted use of many key facilities. Properties on the base declared surplus by the BRAC Commission included warehouses, hangars, offices, and manufacturing and industrial support space. Unlike other base closures, land and buildings at Kelly were being turned over to the Greater Kelly Development Authority (GKDA), the local land reuse authority, for transfer as they became available—even before the operational mission at the base was complete. The Commission gave the Air Force six years to transition Kelly from an active to a closed/realigned base. The closure and realignment was officially completed on July 13, 2001.

The community has been involved in Kelly's cleanup since 1994, when the Restoration Advisory Board (RAB) was created from the Technical Review Committee (TRC). The RAB was created to provide an expanded opportunity for stakeholder involvement in the environmental restoration process at Kelly. The RAB is a forum for the discussion and exchange of restoration program information among the AF, regulatory agencies, and the community. It provides an opportunity for RAB members to review progress and participate in a dialogue with the installation's decision makers concerning environmental restoration matters. The AF listens and gives meaningful consideration to the recommendations provided by individual RAB members.

2.2 Site Description/Location

Kelly AFB is located in Bexar County, Texas, approximately seven miles southwest of downtown San Antonio. While active, the base was comprised of approximately 3,996 acres. Land uses adjacent to Kelly AFB include residential areas and schools to the north, Lackland AFB to the west, industrial (Union Pacific Railroad Yard) and residential areas to the east, and recreational (Pearsall Park), agricultural, and residential areas to the south.

2.3 Site Inspection/Cleanup Activities

Detailed information about the status of the cleanup efforts is available from several sources. For complete, detailed information, visit the Information Repository or the Kelly AFB Web site (<http://www.afropa.hq.af.mil/kelly/>), which contains a complete site history. The following is a brief overview of cleanup activities.

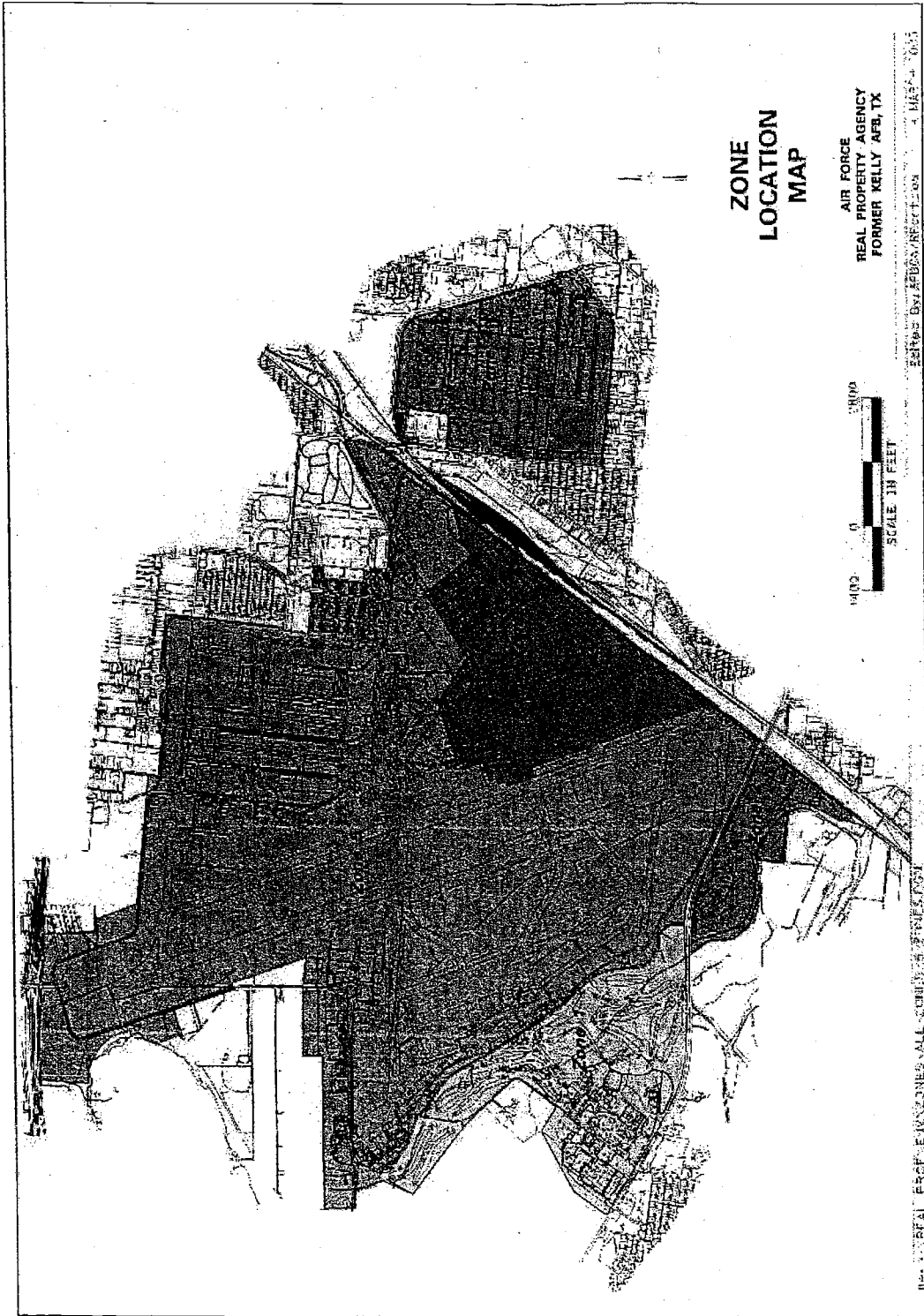
The Air Force began an Installation Restoration Program (IRP) at Kelly in 1982. However, the IRP and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) were not intended to manage hazardous waste. Therefore, these units are regulated under the Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1984. The Texas Commission on Environmental Quality (TCEQ) has been delegated full RCRA and partial HSWA authority by the EPA. Kelly AFB was never listed on the EPA's National Priorities List (NPL) and does not have a Federal Facilities Agreement (FFA) for cleanup under CERCLA. Therefore, the TCEQ is the primary regulatory authority regarding cleanup and closure of Kelly sites.

Prior to closure and realignment, the Air Force, with state and federal regulators, had identified 52 sites for inclusion in the IRP. Realignment of portions of Kelly AFB resulted in the transfer of 17 IRP sites to Lackland AFB for remediation and closure. The remaining 35 IRP sites, located in the closure area of Kelly AFB, are being cleaned up and closed by the AFRPA. For ease of management and to set cleanup priorities, Kelly was divided into five zones (described in Table 1 and shown in Figure 1).

Table 1. Kelly Zone Descriptions

Zone	Description
1	Zone 1 is on the southwest side of the base and includes Security Hill and the golf course. Leon Creek flows through the zone from north to south. This zone was realigned to Lackland Air Force Base, which will complete the cleanup. The 17 IRP sites in this zone include a sludge-drying pit and covered landfills.
2	Zone 2 is in the southeastern part of the base, along Leon Creek. The 16 IRP sites in this zone include the old industrial waste treatment plant and a variety of disposal sites such as sludge and chemical drying pits and a fire training area.
3	Zone 3 contains nine IRP sites, and includes most of the industrial areas on the southeast side of Main Kelly and what was housing for senior officers.
4	Zone 4 encompasses all of East Kelly. It has six IRP sites.
5	Zone 5 covers more than half the base, including the runways, flight line, and the warehouse, administrative, and housing areas in the northeastern part of the base. It has four IRP sites. The runways, flight line, and all facilities west of the runways were realigned to Lackland along with Zone 1 and Lackland will complete their cleanup.

Figure 1. Former Kelly AFB Zone locations



From 1982 to 1995, the Air Force investigated the nature and extent of contamination and put interim actions in place to prevent contamination from spreading while options for long-term solutions were being investigated.

Highlights of this period include a basewide groundwater and surface-water monitoring program begun in fiscal year 1994. Also in 1994, the RAB formed, bringing the community into the cleanup process. By the end of fiscal year 1995, the Air Force had prepared final reports for Remedial Investigation and Feasibility Study (RI/FS) phases for 41 sites in Zones 1, 2, and 3 and installed a number of interim systems on the base boundary.

In 1987, the Air Force was granted a RCRA Part B Permit for a Treatment, Storage, and Disposal Facility (TSDF) at the Defense Reutilization and Marketing Office (DRMO) in Building 3096 (used to store drums of hazardous and industrial wastes). There were also four other Solid Waste Management Units (SWMUs) listed in the permit that required corrective action—Yard 13, Yard N, Building 3065, and Lot Z04 (all closed). The Building 3096 TSDF has been closed and subsequently the permit was closed.

From 1995 until actual base closure in July 2001, the focus of the cleanup program expanded. While the Air Force continued to assess the 35 sites previously identified for the IRP, they also had to address the impact of the drawdown of military activities resulting from the base closure decision. For operations that were not to be realigned to Lackland, the Air Force shifted the primary environmental focus from compliance to corrective action, as the base's focus went from fulfilling a mission to preparing property for transfer. In addition, the future property transfer required that the EPA determine when a property is suitable for reuse and transfer.

Kelly was granted a RCRA Part B Permit in 1998 for closure and post-closure care of four RCRA-regulated units—Site S-8, Site E-3, Site SD-1, and Site SA-2. This permit is accompanied by a Compliance Plan for corrective action and groundwater monitoring of the RCRA-regulated units and a defined list of SWMUs on Main Kelly AFB and East Kelly AFB.

During this time, the Air Force continued to investigate off-base contamination to determine its extent and scope. By 1999, the Air Force had defined the extent of the shallow groundwater contamination and was ready for interim remedy selection. The same year, the Agency for Toxic Substances and Disease Registry (ATSDR) began to conduct a public health assessment (PHA), which they completed shortly before the base closed in 2001. The PHA showed no increased public health risk; however, studies are ongoing and will continue to evaluate the potential environmental impact of activities at the former base.

By January 2004, the Air Force had implemented remedies at 17 sites and is selecting final remedies for the remaining seven sites. Most notably, in April 2002, the Air Force released the draft final Zone 4 Corrective Measures Study (CMS), which describes the Air Force's preferred alternative for addressing both the on-base and off-base shallow groundwater contamination emanating from East Kelly. The Air Force expects to complete installation of all cleanup systems by the end of 2004.

SECTION 3: COMMUNITY BACKGROUND

The subsections that follow present an overview of the community and a general chronology of community involvement and communication to date, as follows:

Section 3.1, Community Profile	Presents an overview of the population and character of the area.
Section 3.2, History of Community Involvement	Discusses the actions taken by the Air Force prior to the solicitation of feedback in 2002.
Section 3.3, Key Community Concerns	Analyzes the major concerns revealed in the public's responses to the 2002 solicitation.
Section 3.4, Summary of Communication Needs	Presents the communication needs and desires as identified or perceived by the community members interviewed.
Section 3.5, Response to Community Concerns	Covers any community involvement actions undertaken in response to concerns, prior to the issuance of this CIP.

3.1 Community Profile

San Antonio is one of the country's oldest southwestern cities and has a population of approximately 1.5 million (representing those living within the city limits). Bexar County, in which Kelly is located, has a population of 1.4 million, which reflects an increase of 17.5% between the 1990 and 2000 census. According to the 2000 census, Hispanics make up about 54% of the population with Anglos at 36% and 20% are from other ethnic groups. Approximately 40% of the population is bilingual, speaking both English and Spanish, and approximately 15% of the population does not speak English. The median household income in Bexar County is \$32,374, and 18.5% of the county's residents live below the poverty level. Approximately 51% of the population is female. Youth under the age of 18 represent 28% of the population, while senior citizens (over 65) represent 10%. Approximately 61% of families own their homes.

Before closure in July 2001, Kelly AFB was the largest single employer in South Texas. Kelly was one of five major military installations in the region. Other major installations include Brooks, Lackland, and Randolph AFBs and the Army's Fort Sam Houston. San Antonio is home to the South Texas Medical Center, the University of Texas Health Science Center, and the United States Automobile Agency (USAA). Other major industries contributing to the San Antonio economy are tourism, international trade, agriculture, and light manufacturing. There are also five four-year colleges and universities and four junior colleges in San Antonio.

San Antonio uses the City Council/City Manager form of government. The respective districts elect council members and the mayor is elected at-large. The council members and the mayor serve no more than two consecutive two-year terms. The Council sets city policy and hires a City Manager to oversee operations.

An elected County Judge and County Commissioners administer Bexar County. Within the county there are 22 municipalities, as well as special districts created for water, education, sewers, and flood control. In 1996, several Bexar County and City of San Antonio services were combined.

3.2 History of Community Involvement

The following section outlines the various opportunities made available for community participation since 1986.

Restoration Advisory Board (RAB)/Technical Review Committee (TRC). Historically, the RAB has been the most dominant and active vehicle for public participation. The Kelly RAB was established in 1994 as an outgrowth of the TRC. The RAB meets at least quarterly to discuss environmental issues. All meetings are open to the public. Meeting locations are identified in Appendix F.

In addition to members of the local community, the RAB includes representatives from AFRPA, the Environmental Protection Agency (EPA), and Texas Commission on Environmental Quality (TCEQ), the San Antonio Metropolitan Health District, GKDA, Bexar Metropolitan Water District, and the San Antonio Water System. The RAB serves as a forum for the continued exchange of information between the community, the regulatory agencies, and the Air Force.

Technical Assistance for Public Participation (TAPP). Through a Department of Defense program called Technical Assistance for Public Participation, the RAB obtains independent plain-language summaries and reviews of technical cleanup documents prepared by qualified contractors.

Technical Review Subcommittee (TRS). One of the subcommittees of the RAB, the TRS is composed of community members of the RAB, representatives of AFRPA/DC-Kelly, and federal, state, and local regulatory agencies. The TRS does much preparatory work for RAB meetings, such as hearing technical reports from the AFRPA, contractors, and regulators, and recommending which reports should be reviewed through the TAPP program.

Information Repository and Administrative Record. The Kelly AFB Information Repository includes more than 300 documents relating to the Environmental Program. In addition to final copies of technical reports, the Information Repository includes copies of outreach publications, news releases and newspaper clippings, RAB meeting minutes, transcripts of public hearings and meetings, and copies of certain government regulations pertaining to the Kelly IRP.

The Administrative Record is required by the CERCLA and the National Contingency Plan, 40 CFR Chapter 300; it must include all documents forming the basis of environmental response actions. Copies of the official Administrative Record are located in each Information Repository. Both files are available for public review (for locations, see Appendix F).

Bilingual Communications. Although selected publications had previously been translated into Spanish in consideration of the significant proportion of Spanish speakers in San Antonio,

in 2000 the use of Spanish was integrated into every aspect of the environmental community involvement program. For example, AFRPA provides simultaneous Spanish translation at all RAB meetings. In addition, several members of the Kelly community involvement staff speak Spanish, and are available to answer the bilingual public information line and provide translation services during tours and briefings.

Publications. Since 1990, the Air Force has provided a regular series of community bulletins, fact sheets, and newsletters. These publications are distributed at RAB meetings and other public forums, and via direct mail to as many as 26,000 residents. Public notices of environmental remediation construction activities that will affect the community are routinely published in area newspapers or delivered to the doors of residents in the affected neighborhoods. Currently all of these publications are produced in both Spanish and English.

Public Forums. AFRPA/DC-Kelly holds public meetings, information sessions, workshops, and public comment periods for remediation documents (as needed). These forums provide members of the community with the opportunity to speak with project managers to learn detailed information about the status and plans for particular sites.

Public Affairs. AFRPA responds to all requests for information from elected officials at all levels, the public, and the media. The Air Force also provides news releases, advisories, conferences, and site tours.

3.3 Key Community Concerns

As part of developing this CIP, the Air Force actively solicited community input to determine current key community concerns regarding the cleanup and to determine the most effective way of sharing information. In an effort to gather information representing the views of the entire community, the Air Force gathered input in two stages. The first was to conduct a series of focus groups, and the second was to conduct one-on-one interviews. AFRPA/DC-Kelly contacted more than 150 community members and leaders in a three-month time frame. In total, the Air Force gathered input from 32 stakeholders, including community residents, RAB members, local officials, and community leaders. While comments from 32 people out of an affected community of 50,000 is not a sample large enough for statistical analysis, the information gathered from this process not only is consistent in terms of community concerns and priorities, but also provides a good representation of key issues. For more detailed information on the methodology used to solicit participation and specific comments from participants, see Appendix G.

Participants voiced strong opinions on the Air Force's responsibility to take action. Participants clearly view the Air Force as the party in charge of, and fully accountable for, all issues associated with the environmental cleanup at the former Kelly AFB. Feedback fell into two primary categories: **trust** and **communication**, which are the same overarching concerns that the Air Force discovered in gathering community input while preparing the 1996 Community Relations Plan.

Lack of trust in the Air Force was one of the most consistent and strongly expressed issues. Whether participants displayed personal distrust, or perceived distrust by a third party, they linked the Air Force's lack of credibility to virtually all their other areas of concern.

In general, trust varied by the extent of participants' prior involvement with the Air Force. Those participants who had interacted directly or extensively with the Air Force cleanup program, particularly through a formal public involvement process (like the RAB), expressed personal distrust of the Air Force, its actions, and intentions. Participants with less interaction or first-hand knowledge of the cleanup program expressed cautious, conditional optimism in the cleanup program, but still perceived a high level of distrust from other "knowledgeable" citizens or media reports.

Like trust, communication represented a theme underlying participants' views of virtually every issue raised. Participants discussed deficiencies, opportunities, and specific expectations regarding communication from the Air Force, state or local government, the media, or other parties related to the cleanup program (see Appendix G: Community Input Methodology and Results for detailed comments). The types of communication discussed ranged from face-to-face dialogue to broadcast media, with participants voicing concerns and preferences for each type.

Perceptions toward communication about the cleanup varied in largely the same manner as perceptions of trust. Participants with more experience interacting with the Air Force expressed extreme dissatisfaction with Air Force communication. Those less aware or less involved expressed a desire for more communication and suggested that the right communication approach might foster their personal trust in the program.

Priority Issues

Participants cited a variety of issues and concerns (provided in full in Appendix G). From this list, three categories of issues clearly represented the participants' top priorities: public participation, health and safety, and the cleanup plan. An additional issue, economic impact, was of importance to members of the focus groups (not interviewees).

1. The primary concern was **public participation**. Participants made it clear that accurate and timely information, accessible opportunities, and appropriate representation were prerequisites to genuine public participation. Participants expressed a wide range of expectations for participating in the decision-making process. Some participants wanted the authority to make or direct technical decisions. Others were content with the role of monitoring and providing feedback on proposed decisions.
2. **Health and safety** followed closely behind public participation. Health problems resulting from living near the contamination was the number one concern of most participants. The second-highest concern was assessing and protecting against a wide range of potential contamination effects. Taken together, these priority concerns translate into the broader desire for a safer community, free from perceived or actual threats to health and the environment.

3. Participants also stated the need for an adequate cleanup plan. Participants defined adequate as timely, specific, sincere, accountable for follow-through, and responsive to public questions and needs. In general, participants think the Air Force does not have an action plan at all, or that what they do have is not sufficient to get the job done.
4. Within the focus groups only, the issue of economic impact on property value emerged. Economic compensation was a specific expectation held by a minority of focus group participants who are closely involved in the cleanup program. Additionally, this concern was coupled in one focus group with a thorough assessment of negative impacts from contamination—concerns grouped under the category of safety.

3.4 Summary of Communication Needs

The focus group and interview participants offered specific suggestions for improving the Air Force's public involvement efforts and preferred methods of information sharing. Most of these suggestions were consistent with what the Air Force found in assessing the impact of its communications tools.

These suggestions fall into four categories: perceptions of the RAB and how the RAB might better represent the community; ways residents or community representatives themselves would like to participate; perceptions of information sources and communication methods; and information delivery systems that participants would prefer to be used to communicate cleanup information. These categories are summarized below, and detailed information can be found in Appendix G.

Improving the RAB. Since its inception in 1994, the RAB has engaged in many debates, ranging from membership selection to the development of meeting agendas. Kelly began providing a facilitator for RAB meetings in 1998 to improve the process. Despite work to improve the functionality of the RAB, participants commented that the RAB is still not operating properly. They specifically noted that RAB members do not appear to listen to each other, and that as a collective unit they need to learn to communicate more effectively. Participants who had attended RAB meetings reported a sense of strain and hostility at the meetings.

Suggestions for improving the RAB included asking RAB members to make an effort to communicate and listen to each other. Participants also suggested that the RAB should do a better job of sharing information with the community.

Participation Options. Participants expressed various levels of willingness to participate in the cleanup program. The following is a summary of ways participants stated they would like to participate in the IRP.

- Participate on all boards discussing cleanup decisions, including the BRAC Cleanup Team.
- Hold a federally sponsored summit in which many groups take the lead and decide on policy issues.
- Develop a community-led/owned redevelopment task force.

- Serve in advisory capacity, helping to communicate issues to neighbors.
- Participate in the RAB.

Information Sources. One of the questions asked of participants was which community groups had enough credibility to help educate community members about the cleanup program. A broad range of organizations was offered; family, community or activist, religious-based, and governmental organizations, or representatives. The message taken from this feedback is that the Air Force should make more effort to involve a wider range of local, community organizations or locally prominent individuals, in communicating information about the Kelly cleanup.

In addition, participants were asked to rate transmission methods by which information was communicated. The top four sources of information, ranked by perceived accuracy, were newspapers, direct mail, TV news, and the radio. A wide range of sources was rated as somewhat less accurate (and less used as information sources), and several were listed as least accurate (and also used least as information sources). NOTE: These ratings are representative only of the individuals who provided them, and should not be construed as directly representative of a larger population.

Preferred Communication Methods. In an attempt to assess whether the communication methods currently used are the most effective ways to reach our target audiences, the Air Force asked participants what methods they prefer. No single communication method or medium distinguished itself as the top preference among participants. Rather, participants suggested tailoring both information and presenters to the audience and issue at hand. However, participants specifically cited public meetings and e-mail/Internet as being ineffective methods of public involvement for the Kelly community.

3.5 Response to Community Concerns

In response to the feedback obtained from the focus groups and interviews, AFRPA/DC-Kelly took some immediate action, instituting new methods or refining existing ones. An overview of these actions is presented by issue, as follows.

Public Participation. Historically, community outreach has focused primarily on the RAB, public meetings, and information bulletins mailed to the community. Community feedback indicated that more direct means of communication would be preferred. For example, in response to the desire to "get the word directly from the Air Force," AFRPA has implemented a number of door-to-door outreach efforts to talk one-on-one with community members about specific cleanup issues or developments.

Additionally, AFRPA provides copies of all BCT meeting minutes to the community at all RAB meetings. The members of the BCT are readily accessible to the public at all RAB meetings.

In 2002, AFRPA began to focus on face-to-face communications with the members of the community. As a result, in 2003 AFRPA provided information directly to 2,600 individuals. This was about 1,100 more contacts than were made in the previous year. AFRPA responded to 199 direct requests for information in 2003. Of these, almost half were received from the Kelly Public Information Hotline.

Also in response to feedback received and historic community concerns about environmental justice, members of AFRPA attended EPA Environmental Justice training on July 16–18, 2002. Other invitees included RAB members, community members, Southwest Worker's Union (SWU) members, Communities Organized for Public Service (COPS) and Metro Alliance representatives, and AFRPA/DC-Kelly contractors. The training combined the principles of environmental justice with hands-on, intensive activities designed to promote cross-training among the participants. The goal was to increase awareness of environmental justice issues within underserved communities, and learn how federal agencies performing environmental remediation work can integrate this understanding into their overall efforts.

Environmental Justice Training

Many of the participants praised the training:

- *"This (EJ training) is a good step in the right direction. I think GKDA and other agencies have a clearer understanding of why we (the community) feel so strongly. We need to continue building trust, it doesn't come overnight."*
- *"From what I was able to see, the different entities present discussed important issues that need to be expressed."*
- *"I think the EPA's EJ training has helped bridge some gaps."*
- *"I recommend that the entire RAB get this training."*

Also, AFRPA collaborated with SWU and participated in a series of three roundtables focusing on health and environmental cleanup.

In 2003, the AFRPA sent a mailing to about 26,000 homes in the Kelly area asking community members to join the AFRPA mailing list. Nearly one hundred people responded and have received regular update letters on the cleanup program.

The AFRPA continued an aggressive recruitment drive for RAB membership by mailing postcards asking for applications to 26,000 homes in the area; advertising in local newspapers; and sending letters of invitation to the mailing list, elected officials, Chambers of Commerce, school districts near Kelly, and churches. The RAB has also created an executive committee composed of government and community members to make decisions on meeting agendas and other parliamentary issues. The RAB has become more productive as a result.

Health and Safety. Over the past several years, the community has become increasingly vocal and concerned about the potential health impacts of living near Kelly, particularly those people living over the shallow groundwater plume. News stories have been published suggesting an increase in cases of ALS among Kelly workers. Several former workers from Kelly have expressed concern about ALS and a possible association with environmental contaminants. Representatives from the South Texas Chapter of the ALS Association, the Air Force Institute for Operational Health (AFIOH) (formerly the Air Force Institute for Environment, Safety, and Health Risk Analysis (AFIERA), the San Antonio Metropolitan Health District (SAMHD), and the Texas Department of Health (TDH) are conducting an evaluation of former Kelly workers.

To date, no linkage has been established between increased mortality associated with motor neuron disease or from employment at Kelly. AFIOH also conducted a mortality study that evaluated causes of death of people who worked at Kelly between 1981 and 2001. This study showed no increased mortality rates among these workers.

In 2001, AFRPA/DC-Kelly, coordinating with SAMHD, began annual contributions to fund the Public Center for Environmental Health (PCEH). AFRPA's support will total \$5 million over 11 years. Located at Brooks City-Base, the PCEH works with AFIOH and other agencies to examine health issues potentially related to the Kelly contamination and cleanup.

Through the PCEH, AFRPA also supports the activities and surveillance that take place through the Environmental Health and Wellness Center (EHWC). PCEH is heavily involved with the EHWC, which was opened by SAMHD in a neighborhood north of Kelly, to provide health screenings for people living near, or who worked at, Kelly. More than 1,883 people have received health screenings since the EHWC opened.

Community residents also expressed concern that the contamination was impacting produce grown in their home gardens. Responding to concerns in the community, an independent laboratory was contracted to collect and measure contamination in samples of homegrown fruits and nuts in and around the Kelly community in the summer of 2001. Data on pecans, peppers, citrus, and other fruits were turned over to SAMHD for final analysis. At a presentation to the Kelly RAB on July 16, 2002, Dr. Fernando Guerra, the Director of SAMHD, announced that fruit and nuts grown in the area were safe to eat. Two follow-on sampling projects have been conducted and the results are expected to be released in early 2004.

The Air Force, in cooperation with SAMHD and the San Antonio Water System, found and plugged 75 improperly abandoned shallow groundwater wells in the affected area at Air Force expense. This eliminated a potential exposure pathway and made the neighborhoods safer for children as many of the wells were only covered by plywood.

Cleanup Plan. The Air Force released the CMSs for Zone 4 and Zone 5 during the summer of 2002. These studies explain the Air Force's preferred plan for dealing with off-base contamination. The Air Force held a 45-day public comment period and three public meetings during that period to explain the cleanup plan.

Economic Impact. In 2001 and 2002, the Bexar Appraisal District reviewed home sales in the communities that surround the former base. Their analysis showed no decreased property values for the community surrounding Kelly. Additionally, the GKDA continues to work to revitalize the area through the development of KellyUSA.

SECTION 4: KELLY COMMUNITY INVOLVEMENT PLAN

As discussed in section 3, the Air Force analyzed the data gathered from the community, as well as the information on their perceptions of effective communication and genuine community involvement. The following observations were made:

- The most significant way to facilitate two-way communication and build trust was revealed as taking information directly to the community, rather than relying on the media or other organizations to serve as information conduits.
- The community needs this approach to better understand Kelly's environmental effort.
- Through this personal approach, the Air Force hopes to increase participation dialogue with the community.

In addition to these more direct communication methods, several earlier methods will be continued, such as the RAB and TRS meetings, the distribution of informational materials, and coordination with other agencies. As this plan is a living document, these methods will be streamlined or adjusted to reflect the focus on more direct contact with the community.

This section is organized as follows:

Section 4.1, Highlights of Plan	Discusses overall goals and approaches to achieve them.
Section 4.2, Community Involvement Activities	Discusses the activities the Air Force will use to address issues identified.
Section 4.3, Correlation of Activities to Issues	A table showing how the activities relate to the issues identified.
Section 4.4, Time Frame Summary for Activities	A general timetable for activities.

4.1 Highlights of Plan

The Air Force is committed to being open and transparent in the decision-making process. This means AFRPA will include the community and solicit input. The Air Force will also proactively make contact with the community and share information in a variety of ways, such as public information sessions, *sobremesas* (informal small group conversations), community bulletins, and public notices. The Air Force will conduct these activities in English and Spanish to address community needs. The ultimate objective is to provide useful information in a form understandable and accessible to the community, via avenues perceived as credible by the community.

To achieve these goals, some broadly applicable approaches will be employed as standard practices in all specific activities:

- Proactively make contact with the community and its members; solicit input.
- Take information directly to the community (i.e. rely less on media outlets).
- Tailor information and presenters to the audience and issue, including providing bilingual information wherever applicable.
- Provide permanent and issue-/event-specific feedback mechanisms to the community; increase awareness of those mechanisms.

4.2 Community Involvement Activities

Activity 1: Maintain the Administrative Record/Information Repositories

Objective: To provide residents with access to the documents and resources used by the Air Force to reach decisions about the site cleanup.

Method: The Administrative Record will be located in the Information Repository at the main branch of the San Antonio library. Additionally, documents are placed in a RAB reference library at the Environmental Health and Wellness Center. (See Appendix F for addresses.)

Timing: The Administrative Record/Information Repository is updated when draft final or final documents become available.

Activity 2: Restoration Advisory Board

Objective: To provide citizens with a meaningful way to become actively involved, and to provide the AFRPA with a viable means of learning first hand citizen concerns, attitudes, and beliefs.

Method: The RAB meets as required, but at least quarterly. Simultaneous Spanish translation is provided at the RAB meetings.

Workshops are provided to RAB members at least annually, to ensure members have the information they need to advise the AFRPA on cleanup decisions.

The Air Force publishes notice for the meetings in the *San Antonio Express-News*, *La Prensa*, the *Kelly Observer*, the *Lackland Talespinner*, and the *Southside Reporter*. These notices are in English and Spanish. The AFRPA also mails postcards directly to 26,000 houses with meeting information. The response rate to those mailings is very low, and the AFRPA is investigating more effective notification methods.

The RAB also has a Technical Review Subcommittee that meets in months when there is no RAB meeting scheduled. The subcommittee allows interested members of the RAB a venue in which to engage in more technical discussion on the cleanup. Refer to Appendix F for meeting locations.

Timing: The RAB formed in 1994, and meets regularly.

Activity 3: Technical Assistance for Public Participation (TAPP)

Objective: To provide independent technical support to the Kelly Restoration Advisory Board, enhancing their ability to participate in the process by improving their understanding of overall conditions and activities.

Method: The Air Force gives the TRS information on reports available for review and on training opportunities. The TRS makes recommendations as to what reports should be reviewed by independent TAPP contractors.

Timing: The first TAPP contract was awarded in 1998. Project is ongoing.

Activity 4: Information Materials – Prepare and Distribute

Objective: To provide citizens with current, accurate, understandable information about the cleanup at Kelly.

Method: The Air Force distributes information in many different formats (i.e. letters, fact sheets, community bulletins, postcards). The information is provided in English and Spanish. The Air Force evaluates the audience for each product, and determines the most effective way to provide the information to each audience. Methods of distribution include direct mail, door-to-door delivery, or placement at highly visible points in the community. AFRPA continuously looks for new methods of distribution.

Timing: Preparation and distribution of materials is event driven. Events requiring information materials may be, but are not limited to, regulatory requirements, cleanup milestones, new projects, meetings, or progress updates.

Activity 5: Internet and E-mail

Objective: To provide increased access information about the Kelly cleanup, and to allow community members to request information from the Public Affairs Officer (PAO) via the e-mail.

Method: The Air Force maintains the Kelly website <http://www.afrpa.hq.af.mil/kelly/>. Information on the website includes news releases, fact sheets, executive summaries of reports, and minutes from meetings of the RAB, the TRS and the BRAC Cleanup Team. The website also lets people send questions or comments directly to the PAO via e-mail.

Timing: The website was redesigned in January 2004.

Activity 6: Mailing List

Objective: To facilitate the distribution of site-specific information to people who want to be kept informed regularly about the cleanup program.

Method: AFRPA maintains a bulk mailing list that includes all residences adjacent to the site, and in known or suspected paths of plume migration. Mailings can be sent to all addresses or can be used to send specific information to people directly affected by a cleanup project.

Additionally, the AFRPA solicits interested parties through a newsletter mailing to 26,000 addresses in the affected area, RAB meetings, public meetings, and speakers bureau engagements. AFRPA works to provide subscribers to the mailing list with new information monthly.

Timing: AFRPA maintains the bulk mailing list and revises it regularly. AFRPA uses the newsletter to solicit subscription to the mailing list annually.

Activity 7: Speakers Bureau Presentations, Site Tours, and *Sobremesas*

Objective: To keep stakeholders and community members informed about the cleanup, while providing AFRPA with feedback from the community.

Method: AFRPA provides information to the community through informal visits with local residents and by offering speakers to local civic and business clubs, local schools, and other local organizations.

Additionally, the AFRPA works to keep government officials, elected officials and other local leaders informed on cleanup progress through briefings and tours.

AFRPA provides tours of the base and cleanup systems to any individual or group on request.

Sobremesas are informal sessions at residents' homes, at which the homeowner is encouraged to invite neighbors and friends. The sessions are informal and educational in nature, focusing on issues of concern to the participants.

All of these methods allow for the two-way communication so vital to a successful cleanup.

Timing: These efforts are ongoing, with a goal of two events per week.

Activity 8: Media Relations

Objective: To encourage accurate media coverage of major events or milestones.

Method: Media advisories are issued to inform journalists of newsworthy developments in the cleanup program. Additionally, any media requests for information are answered as quickly as is possible.

Timing: Event driven.

Activity 9: Toll-free number

Objective: To enable citizens to get the latest information available when they want it, rather than having to wait for a meeting or a fact sheet, and without incurring any cost.

Method: AFRPA has established and continually advertises the availability of this line. The line is answered during normal business hours, and it is checked daily for after-hours messages. Those manning the line speak English and Spanish. Questions and responses are documented in a database.

Timing: Ongoing.

Activity 10: Public Availabilities and Poster Sessions

Objective: To give community members the chance to ask AFRPA representatives questions they have in a comfortable setting, and give AFRPA feedback on whether information is being communicated effectively to the community.

Method: During these sessions the residents are able to speak with the Air Force staff and contractors on a one-on-one basis. AFRPA uses visual aids, like fact sheets and posters to explain the cleanup and encourage discussion. Subjects may be related, but are not limited to, new projects, cleanup milestones, or progress updates.

Timing: AFRPA holds these public availabilities and poster sessions before RABs and public meetings.

Activity 11: Analyze Home Sales Data in Affected Area

Objective: To analyze whether the shallow groundwater plume has impacted home values in the area.

Method: Request an analysis of recent home sales from the Bexar Appraisal District.

Timing: Yearly, if community interest warrants.

Activity 12: Public Comment Periods

Objective: To give community members an opportunity to review and comment on cleanup plans. This provides citizens with the chance to become actively involved in the cleanup process, while giving the Air Force valuable feedback to use in the decision making process.

Method: AFRPA announces public comment periods in the *San Antonio Express-News*, *La Prensa*, the *Kelly Observer*, the *Lackland Talespinner*, and the *Southside Reporter*. The announcements are in English and Spanish. The public comment periods are also announced in AFRPA information materials (i.e. fact sheets).

Timing: Reference U.S. Air Force Installation Restoration Remedial Project Manager's Handbook, May 2000 and Title 30 Texas Administrative Code Chapter 335 for guidance.

Activity 13: Public Meetings

Objective: To update the community on cleanup progress and address community questions, concerns, ideas, and comments.

Method: Notices announcing meetings are published in the *San Antonio Express-News*, *La Prensa*, the *Kelly Observer*, the *Lackland Talespinner*, and the *Southside Reporter*. The notices are published in English and Spanish. Most meetings are held in the evening, and simultaneous Spanish translation is provided. AFRPA holds public meetings in locations convenient to the community. Reference Appendix F for suggested meeting locations.

Timing: Reference U.S. Air Force Installation Restoration Remedial Project Manager's Handbook, May 2000 and Title 30 Texas Administrative Code Chapter 335 for guidance on public meeting requirements.

Activity 14: Responsiveness Summaries

Objective: To summarize comments received during comment periods, to document how the Air Force has considered those comments during the decision making process, and to provide responses to comments.

Method: The AFRPA prepares responsiveness summaries to address community input received during public comment periods. If questions are received in Spanish, they are answered in both English and Spanish.

Timing: Reference U.S. Air Force Installation Restoration Remedial Project Manager's Handbook, May 2000 and Title 30 Texas Administrative Code Chapter 335 for guidance on when responsiveness summaries are required.

Activity 15: Revise Community Involvement Plan

Objective: To identify and address community needs, issues, and concerns regarding the cleanup program.

Method: AFRPA revises the Kelly CIP in accordance with the Environmental Protection Agency's "Superfund Community Involvement Toolkit."

Timing: The Air Force will revise the CIP as events warrant, or at least every three years.

4.3 Correlation of Activities to Issues

Table 2. Correlation of Activities to Issues

Activity	Issue Addressed			
	Concern about level of public participation	Concern about community health and safety	Concern about the progress of the cleanup	Concern about economic impacts of the contamination or cleanup
Administrative Record/Information Repository	✓	✓	✓	
Restoration Advisory Boards	✓	✓	✓	✓
Technical Assistance for Public Participation	✓	✓	✓	
Information Materials – Prepare and distribute	✓	✓	✓	✓
Internet and E-mail	✓	✓	✓	✓
Mailing List	✓	✓	✓	✓
Speakers Bureau Presentations, Site Tours, and Sobremesas	✓	✓	✓	✓
Media Relations	✓	✓	✓	✓
Toll-free number	✓	✓	✓	✓
Availabilities and Poster Sessions	✓	✓	✓	✓
Public Comment Periods	✓	✓	✓	✓
Public Meetings	✓	✓	✓	✓
Responsiveness Summaries	✓	✓	✓	✓
Revise Community Involvement Plan	✓	✓	✓	
Analyze Home Sales Data in Affected Area			✓	✓

4.4 Time Frame Summary for Community Involvement Activities

Table 3 provides a general framework for when community involvement activities will be performed.

Table 3. Time Frame Summary for Community Involvement Activities

Activity	Timeframe
Administrative Record/Information Repository	When draft final or final documents become available
Restoration Advisory Boards	Quarterly
Technical Review Subcommittee	Ongoing
Technical Assistance for Public Participation	Ongoing
Information Materials – Prepare and distribute	Ongoing
Internet and E-mail	Ongoing
Mailing List	Ongoing
Speakers Bureau Presentations, Site Tours, and <i>Sobremesas</i>	Ongoing
Media Relations	Ongoing
Toll-free number	Ongoing
Availability and Poster Sessions	As needed
Public Comment Periods	As needed
Public Meetings	As needed
Responsiveness Summaries	As needed
Revise Community Involvement Plan	Every three years or as needed
Analyze Home Sales Data in Affected Area	Yearly, if community interest warrants

Appendix A: EPA Regional Contacts

EPA Regional Contact

US Environmental Protection Agency
(EPA)

Region 6

Gary Miller

1445 Ross Avenue, Ste. 1200

Dallas, Texas 75202

Phone 214-665-8306

Fax 214-665-6762

miller.gary@epa.gov

Appendix B: Federal, State, and Local Officials

Federal Elected Officials

U.S Congressman **Ciro D. Rodriguez**
 1313 S.E. Military Dr., Suite 115
 San Antonio, Texas 78214
 Phone 210-924-7383
 Fax 210-927-6222

U.S. Congressman **Charlie Gonzalez**
 727 East Durango
 B-124 Federal Building
 San Antonio, Texas 78206
 Phone 210-472-6195
 Fax 210-472-4009

U.S. Senator **Kay Bailey Hutchison**
 San Antonio Office
 145 Duncan Drive
 Suite 120
 San Antonio, Texas 78226
 Phone 210-340-2885
 Fax 210-349-6753

U.S. Senator **John Cornyn**
 600 Navarro
 Suite 210
 San Antonio, Texas 78205
 Phone 210-224-7485
 Fax 210-224-8569

State Officials

Texas State House Representative **Jose Menendez**
 7121 U.S. Hwy 90 West, Suite 240
 San Antonio, TX 78227
 Phone 210-673-3579
 Fax 210-673-3816

Texas State Senator **Frank L. Madla**
 1313 S. E. Military Dr., Suite 101
 San Antonio, Texas 78214
 Phone 210-927-9464
 Fax 210-922-9521

Texas State Senator **Leticia Van De Putte**
 3718 Blanco Rd., Suite 2
 San Antonio, Texas 78212
 (210) 733-6604
 (210) 733-6605 Fax

Local Elected Officials

City Council District 4
Councilman **Richard Perez**
 P.O. Box 839966
 San Antonio, TX 78283-3966
 Phone 210-207-7281
 Fax 210-207-7027

Field Office
Valley-Hi Field Office
 333 Valley Hi Drive, Suite 2110
 San Antonio, TX 78227
 Phone 210-678-0044
 Fax 210-678-0099

City Council District 5
Councilwoman **Patti Radle**
 P.O. Box 839966
 San Antonio, TX 78283-3966
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 Fax 210-207-7027

Field Office
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 San Antonio, TX 78207
 Phone 210-212-2275
 Fax 210-212-4860

City Council District 6
Councilman Enrique M. Barrera
P.O. Box 839966
San Antonio, TX 78283-3966
Phone 210-207-7065
Fax 210-207-7027
dist6field@sanantonio.gov

Field Office
Gateway Plaza Shopping Center
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San Antonio, TX 78227
Phone 210-679-6506
Fax 210-679-5181
dist6field@sanantonio.gov

Bexar County Judge
Judge Nelson Wolff
Bexar County Courthouse
100 Dolorosa, Suite 1.20
San Antonio, Texas 78205
(210) 335-2626
(210) 335-2926 (fax)

Bexar County Commissioner Precinct 1
Commissioner Robert Tejeda
Bexar County Courthouse
100 Dolorosa, Suite 1.20
San Antonio, Texas 78205
(210) 335-2611
(210) 335-2215 (fax)

(In January 2005, Sergio Rodriguez will become the County Commissioner for Precinct 1.)

Appendix C: Environmental and Active Citizens Groups

Restoration Advisory Board (RAB)

Antwine, Adam
Government Co-Chair
 143 Billy Mitchell Blvd., Suite 1
 San Antonio, TX 78226-1816
 AFRPA/DC-Kelly
 (210) 925-5457
 (210) 925-8777
adam.antwine@afropa.pentagon.af.mil

Ryan, William (Alt for Adam Antwine)
 AFRPA
 143 Billy Mitchell Blvd., Ste. 6
 San Antonio, TX 78226-1816
 (210) 925-0227
 (210) 925-3636
william.ryan@afropa.pentagon.af.mil

Converse, Sandra

DeNuccio, Mike
 City Council District 6
 100 Military Plaza, 2nd Floor City Hall
 San Antonio, TX 78205-2425
 City Council District 6
 (210) 207-7065
barrera@denuccio.net

Garcia, Jr., Rodrigo

Gonzales, Daniel

Martin, Gary
 GKDA
 143 Billy Mitchell, Ste. 6
 San Antonio, TX 78226-1816
 (210) 362-7877
 (210) 362-7807
gary.martin@kellyusa.com

Miller, Gary
 US EPA, Region VI
 6PD-NB 1445 Ross Avenue, Ste. 1200
 Dallas, TX 75202
 (214) 665-8306
 (214) 665-7263
miller.gary@epa.gov

Murrah, Sam

Muzquiz, Peter

Peña, Ruben
Community Co-Chair
 257 E. Mayfield
 San Antonio, TX 78214-2445
 (210) 495-5015 ext. 117
ruben@tcaustin.com

Perez, Nazirite

Rice, George

Quintanilla, Armando
(Alt for George Rice)

Rodriguez, Jr., Nicolas
 Bexar Metropolitan Water District
 2047 W. Malone
 San Antonio, TX 78225
 (210) 354-6536
 (210) 922-5152
nrodjr@bexarmet.org

Ahrens, Chuck
(Alt for Nicholas Rodriguez)
Bexar Metro Water District
2047 W. Malone
San Antonio, TX 78221
(210) 357-5710
(210) 922-5152
nrodjr@bexarmet.org

Rodriguez, Sergio

Sanchez, Sam
San Antonio Metropolitan Health District
332 W. Commerce, Room 101
San Antonio, TX 78205
(210) 207-8853
(210) 207-8039
samsanchez@sanantonio.gov

Cunningham, Kyle (Alt for Sam Sanchez)
Environmental Health and Wellness Center
911 Castroville Rd
San Antonio, TX 78237
San Antonio Metropolitan Health District
(210) 434-1079
(210) 434-1540

Sheneman, Michael

Silvas, Robert

Weegar, Mark
Corrective Action Section
TCEQ
12100 Park 35 Circle, Bldg D
Austin, TX 78753
(512) 239-2360
(512) 239-2346
mweegar@tceq.state.tx.us

Power, Abbi (Alt for Mark Weeger)
TCEQ
14250 Judson Rd.
San Antonio, TX 78233-4480
(210) 403-4064
(210) 545-4329
apower@tceq.state.tx.us

Appendix D: Associated Parties/Agencies

Texas Commission on Environmental Quality (TCEQ), Region 13, San Antonio
 Ms. Abbi Power
 14250 Judson Road
 San Antonio, Texas 78233-4480
 Phone 210-403-4064
 Fax 210-545-4329
apower@tceq.state.texas.us

TCEQ Austin Headquarters
 Mr. Mark Weegar
 12100 Park 35 Circle Building D
 Austin, Texas 78753-1808
 Phone 512-239-2360
 Fax 512-239-2346
mweegar@tceq.state.tx.us

City of San Antonio Environmental Services Department
 Mr. David E. Newman
 Environmental Management Division
 Manager
 1920 Grandstand
 San Antonio, Texas 78238-4549
 Phone 210-207-6440
 Fax 210-207-6411
dnewman@sanantonio.gov

Alamo Area Council of Governments (AACOG)
 Mr. Peter D. Bella
 Natural Resources Director
 8700 Tesoro Drive, Suite 700
 San Antonio, Texas 78217
 Phone 210-362-5249
 Fax 210-225-5937
pbella@aacog.com

Kelly Health Information Office
 Ms. Larisa Dawkins
 143 Billy Mitchell Blvd., Ste 1
 San Antonio, TX 78226-1816
 Phone 210-925-3026
 Fax 210-925-3636

Public Center for Environmental Health
 Kyle Cunningham
 Program Manager
 2513 Kennedy Circle
 Building 180, Suite 105
 Brooks City-Base, TX 78235
 Phone 210-532-5765
 Fax 210-532-3747

San Antonio Metropolitan Health District (SAMHD)
 Mr. Fernando A. Guerra, M.D., M.P.H.
 332 West Commerce
 San Antonio, Texas 78205-2489
 Phone 210-207-8780
 Fax 210-207-8999

San Antonio Metropolitan Health District Environmental Health and Wellness Center (EHWC)
 Linda Kaufman
 Program Manager
 911 Castroville Road
 San Antonio, Texas 78237
 Phone 210-434-0077
 Fax 210-434-1540

Texas Department of Health (TDH)
 1100 West 49th Street
 Austin, Texas 78756
 512-458-7111

The Air Force Institute for Operational Health (AFIOH)
 2513 Kennedy Circle
 Brooks-City Base, Texas 78235-5123
 Phone 210-536-5454
 Fax 210-536-3228

**Agency for Toxic Substances and Disease
Registry (ATSDR)**

Maria Terran-Maciver
1600 Clifton Road E31
Atlanta, Georgia 30333
Phone 404-498-1754
Fax 404-498-1744
maria.teranmaciver@cdc.hhs.gov

**The Amyotrophic Lateral Sclerosis (ALSA)
Association**

The ALS Association National Office
27001 Agoura Road, Suite 150
Calabasas Hills, CA 91301-5104
www.alsa.org

**ALS Association
South Texas Chapter**

6800 Park Ten Blvd.
Suite 220N
San Antonio, Texas 78213
Phone 210-733-5204
Fax 210-733-5206
Patient Services 877-257-4673
alsasotex@stic.net
www.alsa-south-texas.org

The Alamo Breast Cancer Foundation

P.O. Box 780067
San Antonio, Texas 78278
Phone 210-210-822-1000
www.alamobreastcancer.org

Bexar Appraisal District

Mailing Address
P.O. Box 830248
San Antonio, Texas 78283-0248

Physical Address

411 North Frio
San Antonio, Texas 78207
Main Number 210-224-8511
Customer Service 210-224-2432
Fax 210-242-2454
cs@bcad.org

**The Greater Kelly Development Authority
(GKDA)**

Gary Martin
143 Billy Mitchell Blvd., Ste. 6
San Antonio, Texas 78226-1816
Phone 210-362-7877
Fax 210-362-7807
gary.martin@kellyusa.com

Southwest Workers Union

Chavel Lopez
P.O. Box 830706
San Antonio, Texas 78283-0706
Phone 210-299-2666
Fax 210-299-4009
info@swunion.org

Appendix E: Media Contacts

The following is a sample listing; for a complete list, please see the office copy of the Greater San Antonio Chamber of Commerce media guide.

The San Antonio Express News

400 3rd Street
 San Antonio, TX 78287-2171
 Phone 210-250-3171
 Fax 210-250-3105

The San Antonio Business Journal

70 NE Loop 410
 Suite 350
 San Antonio, TEXAS 78216
 Phone 210-341-3202
 Fax 210-341-3031

La Prensa

318 South Flores Street
 San Antonio, Texas 78204
 Phone 210-242-7900
 Fax 210-242-7901

The Kelly Observer

7137 Military Drive West
 San Antonio, Texas 78227
 Phone 210-675-4500
 Fax 210-675-4577
sblack@idworld.net

The Southside Reporter

2203 S. Hackberry
 San Antonio, Texas 78210
 Phone 210-534-8848
 Fax 210-532-9329

The San Antonio Current

1500 N. St. Mary's Street
 San Antonio, Texas 78215
 Phone 210-227-0044
 Fax 210-227-6611

KSAT 12

1408 N St Mary's Street
 San Antonio, Texas 78215
 Phone 210-351-8011

Fax 210-351-1297

WOAI 4

P.O. Box 2641
 San Antonio, Texas 78299-2641
 Phone 210-226-5665
 Fax 210-224-9898

KENS 5

5400 Fredericksburg Road
 San Antonio, Texas 78229
 Phone 210-366-5000
webmaster@kens5.com

KLRN 9

P.O. Box 9
 San Antonio, Texas 78291
 Phone 210-270-9000

KABB/FOX 29

4335 NW Loop 410
 San Antonio, TX 78229
 Phone 210-442-6397
 Fax 210-442-6333

News 9 San Antonio

600 E. Euclid Avenue
 San Antonio, TX 78212-4405
 Phone 210-581-9999
 Fax 210-581-5632

KWEX 41

411 E. Durango Blvd.
 San Antonio, Texas 78204
 Phone 210-227-4141
 Fax 210-227-0469

KVDA 60

6234 San Pedro Ave
 San Antonio, Texas 78216
 Phone 210-340-8860
 Fax 210-341-3962

WOAI

6222 NW IH 10, Suite 200
San Antonio, TX 78201-2097
Phone 210-736-9700
Fax 210-735-8811

KTSA

4050 Eisenhower
San Antonio, TX 78218-3409
Phone 210-528-5500
Fax 210-599-5539

Appendix F: Meeting and Repository Locations, and Other Local Resources

Meeting Locations

Kennedy High School
1922 S. General McMullen Dr.
San Antonio, TX 78226-1129
(Routinely the site of RAB meetings)

Environmental Health and Wellness Center
911 Castroville Road
San Antonio, TX 78237
(Routinely the site of TRS meetings)

Repository Location

San Antonio Central Library
(Government Documents Section)
600 N. Soledad
San Antonio, TX 78205

RAB Reference Library

Environmental Health and Wellness Center
911 Castroville Road
San Antonio, TX 78237

Other Resources

Relevant Documents and Guidance

DERP Management Guidance, September 2001

http://www.dtic.mil/envirodod/Policies/DERPMgt/DERP_MGT_GUIDANCE_0901.pdf

EO 12989, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, February 1994

RCRA Public Participation Manual

www.epa.gov

Superfund Community Involvement Handbook (updated regularly)

www.epa.gov/superfund

U.S. Air Force Installation Restoration Remedial Project Manager's Handbook, May 2000

APPENDIX G: COMMUNITY INPUT METHODOLOGY AND RESULTS

A required part of developing a Community Involvement Plan (CIP) is to gather information from members of the community. The following describes the AFRPA/DC-Kelly methodology for collecting input.

The DoD, and thus the Air Force, follows the National Contingency Plan (NCP), 40 CFR Chapter 300, requirements for developing CIPs. The NCP requires interviews with a minimum of 10 to 15 community members. The purpose of the interviews is to obtain qualitative information about the community's level of knowledge about the cleanup and their priorities—these interviews are not intended to extract quantitative information (that is, information that can be used for statistical analysis). For a cleanup program as complex as that of Kelly, and a community consisting of more than 50,000 affected citizens, AFRPA/DC-Kelly management thought it was important to conduct more interviews than required. Interviews were conducted not only with members of the community and the RAB, but with community leaders and activists who could speak for their constituents as well. By speaking with a wide range of stakeholders, AFRPA was able to obtain richer information about the community.

Methodology

AFRPA/DC-Kelly took a two-tiered approach to gathering community input. The first was to conduct a series of focus groups. The second was to conduct interviews with community leaders, private citizens, and other stakeholders. In total, 21 people participated in the focus groups and 11 people participated in the interviews, for a total of 32 participants.

The Air Force went to great lengths to recruit as broad and representative a sample of focus group participants as possible. The final 32 participants included a diverse mix of residents, community leaders, special interest group representatives, and citizens interested in the cleanup planning process.

Of the 32 participants, 7 were members of the RAB. This large presence by RAB members was expected because the RAB is a formal mechanism for community involvement in the cleanup program. RAB input and perceptions were deemed a critical part of focus group discussions, and the first focus group was planned to consist entirely of RAB members. Three RAB members asked, and were given the opportunity, to participate in other focus groups where residents or community leaders were the primary participants. RAB influence, however, was not limited to its members' participation; several residents or special interest group representatives had interacted regularly with the RAB for months or even years, and expressed opinions and perceptions that referenced such interaction.

AFRPA took many steps to ensure the community was informed of the focus groups and the groups were held at convenient locations and times:

- focus groups were made available on five different evenings in neutral locations
- multiple bilingual ads were placed in several local newspapers
- more than 150 telephone calls to a systematic random sample of community residents were made
- community leaders and organizations were directly invited to participate

- opportunities were provided for interested parties to participate in one-on-one interviews

As a result, 14 persons not on the RAB came to the focus groups and 11 agreed to interviews. One person attended the focus groups as a result of the newspaper ads. Only three or four attended as a result of random calls to the community. The other participants were community leaders or representatives of special interests groups with a stake in the cleanup plan. It is important to note that 10 people who agreed to participate in the focus groups did not come to their session, even after they received follow-up confirmation calls. For the interviews, 24 people who were contacted declined to participate.

While 32 persons out of an impacted community of more than 50,000 is not a sample large enough for statistical analysis, their comments and insights provided valuable information that will help the Air Force determine more effective methods of conducting community involvement efforts.

Focus Group Methodology

In its focus group planning process, the Air Force sought to involve as broad a cross-section of the community as feasible within the schedule and resources. Each focus group involved participants of similar interests and backgrounds, as much as possible. Such a homogenous make-up allowed participants to interact more freely and relate to one another in a way that encouraged dialogue and frank expression.

Another measure taken to foster open, candid discussion was to have no Air Force officials present at the focus group sessions. Professional focus group facilitators and public affairs support contractors administered the sessions. Focus group participants were given written assurance that none of their comments would be attributed individually.

Additionally, the Air Force contacted the following interest groups in an effort to identify focus group participants. Nineteen representatives from four of these organizations came and participated in the focus groups.

- Kelly RAB
- Quintana Road Neighborhood Association
- Southwest Workers' Union (SWU)
- League of United Latin American Citizens (LULAC)
- The Archdiocese of San Antonio or parish priests, ministers, other religious leaders
- Residents Organized for a Safe Environment (ROSE)
- Local school districts
- Hispanic Association of Colleges & Universities (HACU)
- Hispanic Chamber of Commerce
- Women's Chamber of Commerce
- West San Antonio Chamber of Commerce
- San Antonio Minority Business Development Center
- National Association for the Advancement of Colored People (NAACP)
- American Civil Liberties Union (ACLU)

- Esperanza Peace and Justice Center

Focus group sessions occurred as follows:

Focus Group Date	Community Interests Represented	Number of Attendees
April 2	RAB members	7
May 29	Community residents	7
May 30	Spanish-speaking residents	2
June 1	Special interest groups	6
June 2	Community leaders/representatives	2
	Total Focus Group Attendance	24*

**Three RAB members attended more than one session, making the actual number of focus group participants 21.*

The intent and design of focus group discussions was to help clarify the general concerns, interests, priorities, and preferences required in the updated CIP.

Interviews

The Air Force conducted one-on-one follow-up interviews with stakeholders who were unable to attend the focus group sessions and with local community leaders and activists. The purpose of these interviews was to augment the data gathered in the focus groups. These community leaders and activists were able to speak on behalf of their constituents, providing the Air Force with richer data.

Interviews were conducted between June 17, 2002, and August 19, 2002. The Air Force identified interviewees during the calling process for the focus groups and by targeting leaders identified from the list of organizations provided by focus groups as being trusted sources of information. The following were interviewed:

- Texas State Senator
- Texas State Senator Legislative Assistant
- Texas State Representative
- U.S. Congressman
- EPA Region VI Representative
- TCEQ Representative
- City Council Staff Member
- Kelly Neighbors (two)
- GKDA Representative
- Media Representative
- Community Organization Representative

Issue Identification Approach

The primary purpose of collecting input from the community is to identify issues and concerns so that the Air Force can incorporate them into its community outreach and involvement efforts. To obtain this information, both focus group participants and interviewees were asked the following questions:

1. What concerns you about the Air Force cleanup at Kelly?
2. Which of these concerns are most important?
3. What is the Air Force doing to address these concerns? Do you know of anything the Air Force is doing to address these concerns?
4. What should the Air Force be doing differently, or better, to address your concerns?
5. What role do you think the public should have in the cleanup at Kelly?
6. Would you like to participate in some way in the cleanup at Kelly?
If YES, how would you like to participate?
7. Have you heard of the Restoration Advisory Board (RAB)?
8. What do you think the Restoration Advisory Board should do to represent community interests in the cleanup at Kelly?
9. In addition to the Restoration Advisory Board, what community or cultural groups would you want to help represent your interests in these issues?
10. If there was one thing that could help improve public trust in the Air Force, what would it be? What would it take for the public to trust the Air Force?
11. What information is **most important** to provide to the community about the cleanup at Kelly?
12. How would you, **personally**, prefer most to receive information about the cleanup at Kelly?
13. In your opinion, how would **your community (as a whole)** prefer most to receive information about the cleanup at Kelly?
14. In your opinion, how would **the Spanish-speaking community** prefer most to receive information about the cleanup at Kelly?

Responses to these questions and the discussions arising from them made clear the primary concerns, priorities, preferences, and perceptions of the participants.

Within the focus groups, the facilitator for each session ensured that all participants had a chance to voice their opinions and respond to the questions, and kept the discussion focused on the issues at hand. If participants raised issues outside the focus group agenda, the facilitator placed the issues on a list of items the Air Force committed to address at a later time.

Overview of Findings

Two clear, encompassing themes emerged as a result of the community input: **trust and communication**. These principles were either explained or derived from the major issues or perceptions identified in the focus groups. It is worth noting that these two themes dominated the community input gathered while developing the 1996 Community Relations Plan.

Trust

Lack of trust in the Air Force was one of the most consistent and strongly expressed issues among participants. Whether they displayed personal distrust, or perceived distrust by a third

party, participants linked the Air Force's lack of credibility to virtually all their other areas of concern or priority.

In general, trust varied by the extent of participants' prior involvement with the Air Force. Those participants who had interacted directly or extensively with the Air Force cleanup program, particularly through a formal public involvement process (like the RAB), expressed personal distrust of the Air Force, its actions and intentions. Participants with less interaction or first-hand knowledge of the cleanup program expressed cautious, conditional optimism in the Air Force cleanup program, but still perceived a high level of distrust from other "knowledgeable" citizens or media reports.

Communication

Like trust, communication represented a theme underlying participants' views of virtually every issue raised. Participants discussed deficiencies, opportunities, and specific expectations regarding communication from the Air Force, state or local government, the media, or other parties related to the cleanup program. The types of communication discussed ranged from face-to-face dialogue to broadcast media, with participants voicing concerns and preferences for each type.

Participants' perceptions toward communication about the cleanup varied in largely the same manner as perceptions of trust. Participants with more experience interacting with the Air Force expressed extreme dissatisfaction with Air Force communication. Those less aware or less involved expressed a desire for more communication, and suggested that the right communication approach might foster their personal trust in the program.

Priority Issues

Three categories of issues clearly represented both the focus group and the interview participants' top priorities: public participation, health and safety, and the cleanup plan.

1. The primary concern was **public participation**. Participants made it clear that accurate and timely information, accessible opportunities, and appropriate representation were prerequisites to genuine public participation. Participants expressed a wide range of expectations for participating in the decision-making process. Some participants wanted the authority to make or direct technical decisions. Others were content with the role of monitoring and providing feedback on proposed decisions.
2. **Health and safety** followed closely behind public participation. Health problems thought to be resulting from living near the contamination was the number one concern of most participants. The second-highest concern was assessing and protecting against a wide range of contamination effects, including property value, environmental degradation, health problems and quality of life. Taken together, these priority concerns translate into the broader desire for a safer community, free from perceived threats to health and the environment.
3. Participants also stated the need for an adequate **cleanup plan**. Participants defined adequate as timely, specific, sincere, accountable for follow-through, and responsive to

public questions and needs. In general, participants thought the Air Force does not have an action plan at all, or that what they do have is not sufficient to get the job done.

Within the focus groups only, the issue of economic impact on property value emerged. This issue did not emerge at all in the one-on-one interviews. Economic compensation was a specific expectation held by three participants who are closely involved in the cleanup program. Additionally, this concern was coupled in one focus group with a thorough assessment of negative impacts from contamination—concerns grouped under the category of safety.

Participants' Priorities

Participants were encouraged to offer suggestions for improvement for each concern identified. This section outlines the specific concerns, observations and suggestions offered by participants for each priority issue. The following table summarizes the specific concerns and observations offered by participants for each priority issue and for the pervading themes of trust and communication. Additionally, the table provides participants' assessments of Air Force efforts to date, and suggestions for improvement.

Most of the feedback below is paraphrased or verbatim language from participants, and as such, may apply more broadly than its assigned category would indicate.

Table A1—Community Concerns and Suggestions attempts to categorize this feedback appropriately.

Table A1—Community Concerns and Suggestions

Table A1	Specific Concerns and Comments	Assessments and Suggestions
Trust	<ul style="list-style-type: none"> • We don't trust one another (RAB/Air Force); Air Force shows lack of concern for citizens' issues • There is a lack of trust in what Air Force has done to help (clinic results particularly) • Air Force public outreach is just a token effort, doesn't result in anything • "Will you sugar-coat our concerns to make it appear that everything is okay?" • The government has tried to hide soil sampling locations and dates/times • There is a conflict of interest because Corp of Engineers (COE) pays TCEQ to regulate the cleanup • The city is paying attention to similar issues when the community is affluent • "Are we wasting our time?" • "Seems like the Air Force is denying the problem from what I've read in the newspaper" 	<p><i>What the Air Force has done:</i></p> <ul style="list-style-type: none"> • "Tremendous public relations staff, but it's only to make the Air Force look good, clothed in white like a virgin, not to help the community" <p><i>What the Air Force should do:</i></p> <ul style="list-style-type: none"> • Tell the truth about contamination and its impacts on human health • There will be no trust in the Air Force until they start showing tangible evidence of the cleanup <p><i>The one thing that would help most to improve trust:</i></p> <ul style="list-style-type: none"> • Honest, accurate, thorough and timely communication with the entire community • Conduct a thorough assessment (that we can trust) of contamination and its effects • Acknowledge responsibility and accountability • Provide economic compensation • A detailed, long-range cleanup plan • Involve us in the decision-making process • Respond to community concerns • "Get out of their ivory tower" • Work informally in neighborhoods, one-on-one and with groups and community leaders • Admit what they did was wrong, compensate families • Show that the cleanup is effective • Show sympathy for the community's situation

Table A1	Theme/ Priority	Specific Concerns and Comments	Assessments and Suggestions
Communication	<ul style="list-style-type: none"> • There is a lack of communication among government agencies • The Air Force needs to communicate more information to the community • Air Force hasn't communicated effectively • Can you eat pecans on trees in your yard? People can relate to information like that • "It seems like they were patronizing us" in previous meetings • No follow-up, no follow-through on public concerns or potential remedies • People do not trust having [information] in a giant binder that they will never read • It is important that the Air Force think like the audience that it is trying to reach • The Air Force is communicating, but the message is often times confusing, which creates mistrust • Concerned about accuracy and availability of information: - Are the agendas of the varying agencies involved the same? - Are there turf battles in terms of this process? 	<p><i>What Air Force has done:</i></p> <ul style="list-style-type: none"> • Made more info available, more accessible • "It's like pulling hen's teeth" • Do not know of anything the Air Force is doing <p><i>What the Air Force should do:</i></p> <ul style="list-style-type: none"> • Provide clearer information on what Air Force officials actually do (perhaps this would generate more empathy toward them) • Provide more expedient, quicker answers • Provide answers in public • Respect community intelligence, be forthcoming with information requested and make the information sophisticated, not ad hoc • Help community feel like there is progress • Communicate with community members • Information should be communicated to the public in a one-sheet, 10-bullet way, both clear and concise • Communicate more effectively and in a more timely fashion • Send out a community-wide mailing to generate a better public image (as opposed to image in newspaper articles) • Community leaders can help their constituents better understand the information. 	

Table A1		Assessments and Suggestions
Theme/ Priority	Specific Concerns and Comments	
Public participation	<ul style="list-style-type: none"> Community (esp. the RAB) has little power over the Air Force path; RAB is just symbolic and has no real decision-making authority Poor or Hispanic people are less influential, taken advantage of Base closure, GKDA boards do not represent community or are less than accessible; need greater representation on them The room temperature is cold at RAB meetings, appears to be intentional "Concerns me that every four years we have these focus groups and there's nothing that's done; we need real changes and not window dressing; the Air Force will put this in the best light possible and not address the issue" There is not adequate demographic representation; "they don't speak our language" The local government is not supporting the community "A lot of people are milking this, let's face it, they're saying 'I want this,' like unions, but they're not really coming to the table with a part of the solution...they need to be proactive as well and not just ask" RAB meetings are informative Focus groups like this are a good idea We still have the same problems as before -- the same thing will happen this time (Air Force won't pay attention to our input) RAB does not have resources to put out its own information The RAB should be the lead organization, despite that it is thought of suspiciously; It is the main avenue for ideas to be exchanged 	<p><i>What the Air Force has done:</i></p> <ul style="list-style-type: none"> Outreach, but not enough Presentations; a lot of meetings to try to appease people "Only thing I know of is your focus group" The Air Force is producing information materials and distributing them <p><i>What the Air Force should do:</i></p> <ul style="list-style-type: none"> Give greater access to decision-making meetings The Air Force should address institutionalized racism Provide more resources to the RAB so it can put out its own information More respect and representation at all levels Involve community in the affected areas of town; be creative in reaching out to south side citizens Send detailed information to allow residents to make their own decisions If transportation to and from public meetings is an issue, engage VIA to help shuttle people to and from the meetings
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Table A1

Theme/ Priority	Specific Concerns and Comments	Assessments and Suggestions
<p>Safety and Health</p> <ul style="list-style-type: none"> Community has not been informed or asked about health issues, problems, Air Force health initiatives Air Force had little to do with the progress that the clinic represents "I feel unprotected" Public health is at risk There has been insufficient investigation done into contamination Local water resources are contaminated "Doctor said don't let your kids play in the water, don't drink it, it's only good for watering your lawn." "There's been a higher rate of ALS around the area" Acquaintances who worked at Kelly have had cancer Concerns that private contractors occupying the former base will do the same thing as the Air Force Health is a serious issue; If it is proved the Air Force is fully responsible, they should be held accountable Concern about compensation for health effects of contamination, high concentration of diseases/health of community, addition of more chemicals as part of cleanup techniques—concern about side effects of these chemicals, whether the cleanup will be comprehensive enough and the timetable of cleanup quick enough Residuals. What, how much of the contamination is responsible for health issues in the surrounding areas. 	<p><i>What the Air Force has done:</i></p> <ul style="list-style-type: none"> "Gains are very minor" Health clinic (but some say Air Force was pressured into clinic) "Independent epidemiologist (Dr. Squibb) was good, the studies she referenced were things the Air Force should have considered" <p><i>What the Air Force should do:</i></p> <ul style="list-style-type: none"> Research on health impacts Fund a third-party study of health issues Do a study of past employees who are "dying left and right" Address focus group participant's specific health issue which allegedly resulted from work at Kelly An acknowledgement of complicity would be a very positive step The public needs to be informed, needs to assist in performing studies and health assessments, to organize, to protect their interests [Community members] need to be tracked to make more definitive health assessments Have community-based committees determine compensation for each family, allowing citizen-based committees to directly allocate funding; continue health screenings, but these screenings should identify unknown problems, not just screen for known diseases; provide full copies of all studies, not just summaries; have people with correct answers at public meetings; have representatives of all affected agencies at public meetings and use video for comments at public comment period meetings (because the passion of the community comments is lost when those comments are written down on a comment card) 	<p>KELLY AR # 3239</p>

Table A1 Theme/ Priority	Specific Concerns and Comments	Assessments and Suggestions
Cleanup	<ul style="list-style-type: none"> • Air Force has communicated no clear path forward; there is no specific plan in place • Cleanup is taking too long • State and local officials are not helping much; "city has dragged its feet" • There is no action plan or awareness of what to do • There is a lack of clear, very specific, credible explanations of the contamination and the plan to clean it up • The Air Force has not and will not admit responsibility for the contamination • There is uncertainty regarding availability of external, credible sources of information about contamination and cleanup issues • There is no plan; this is taking too long • Air Force is "arrogant" and won't accept responsibility for contamination • "Give us a start to finish plan" • Just because there's no evidence now doesn't mean evidence won't show up in the future • How big of a problem is there and what is the plan? • "If the Air Force/Government would exhort as much time and energy like they did to stomp out terrorism, the cleanup around our bases would go a lot faster. Isn't the chemicals left behind like "terrorism" for the folks that live around the bases?" • Making sure the final plan/ remedy is effective and there is follow-through, i.e. the process is completed and that continuing liability aspect of the plan is followed through • What environmental technology is the Air Force using, not just natural attenuation 	<p><i>What the Air Force should do:</i></p> <ul style="list-style-type: none"> • Involve the RAB in significant cleanup decisions • Detailed cleanup plan • Admit culpability now • One single expedited plan with penalties for non-compliance • Air Force needs to take initiative and not wait for city to do something • Identify the depth of the problem and specify how the Air Force is going to clean it up, full evaluation • Obtain an independent, private evaluation of the problem • Resolve problems with property contamination (like a site for a proposed library that was so contaminated they couldn't obtain a building permit) • Develop technical remediation plan, then redevelopment plan • The liability aspect is not articulated clearly. The Air Force should never say more than it has to. We, the community, know who the responsible parties are and the constituents affected will always feel suspicious • The public should be in charge of all aspects of the cleanup; decisions should be made by the community and the government should provide funding for assistance by professional experts

Table A1 Theme/ Priority	Specific Concerns and Comments	Assessments and Suggestions
Economic issues	<ul style="list-style-type: none"> • Personal property is contaminated and there is no just compensation foreseen • Investigations into contamination have been inadequate • "They're robbing the people" • The government has resources to address these issues; a private company like Enron would not even be going this far 	<p><i>What the Air Force should do:</i></p> <ul style="list-style-type: none"> • Ask appraisers to come in and do valuations on property • Compensate for property devaluation

Improving Public Participation

Participants offered specific suggestions for improving Air Force public involvement efforts. These suggestions are divided into three categories. The first comprises participants' perceptions of the RAB and how the RAB might better represent the community. The second includes ways residents or community representatives themselves would like to participate. The third category lists groups besides the RAB that focus group participants would trust to deliver cleanup information. *Note: these comments were taken directly from focus group and interview participants. Verbatim quotes are used when appropriate.*

I. Improving the RAB

- The Air Force should let RAB know that "in the last meeting I picked up a lot of hostility... some of its members aren't listening...they represent the community and shouldn't be hashing over past issues or action items so much"
- RAB should not be the only group representing the public, city government should as well
- Improve RAB's credibility
- Share responsibility for outreach to the community
- RAB should be provided with the power to tell the Air Force what must be done
- RAB "shouldn't do more harm" in its decisions; it could pose an obstacle to progress that could be made by south side local community groups; "RAB should not interfere with what people are doing for themselves; I don't know if there's a perception that the RAB is interfering"
- Know the problem, boost image of the area
- Just communicate; there appears to be an ulterior motive for membership; participant observed at the past RAB meeting "people were overbearing, talking over each other; one Air Force member was just "I don't know" and very stand-offish; they should communicate better with one another. If we could just get past this hostility we would have so many people who don't know about this." Participant noted lack of desire to be represented by a RAB member who was "grandstanding" and contributing to an "uncomfortable environment"
- "Perhaps an anger management class"
- "I picked up on it immediately, so I just observed, it seemed to me...I saw someone rolling their eyes
- They (the RAB and the Air Force) should interact constructively, communicate better
- They (the RAB) are doing what all boards in an advisory capacity do, and that is to advise. They have no power to do anything. The government should spend less money on organizing and running the board and spend it on the cleanup.
- Meet with community members, have monthly public meetings/open door meetings, convey messages from the community to the Air Force and observe internal government meetings.

II. Participation Options

- Participate on BRAC Cleanup Team
- Public needs to know more in order to fill a role in the first place
- "We are the public; as the RAB we represent the public"
- Hold a federally-sponsored summit in which many groups take the lead and decide on policy issues
- Provide basic information and let the public form opinions
- Participant suggested hiring someone to investigate how many cancers there are and of what types they are in the community
- Participate on all meaningful boards
- Participant suggested more communication from RAB to the community
- Participant sees combined role of Air Force and RAB and AFRPA to more proactively identify citizen representatives on boards that are relevant
- Defer to expertise of RAB and involved citizens
- Give weight to local business issues and make them part of the revitalization plan rather than big "external" companies
- Community-led/owned redevelopment task force
- Citizens should play advisory role, monitoring the sincerity and value of the cleanup effort
- Wasn't aware there was a RAB
- RAB is ample representation
- Serve in advisory capacity, helping to communicate issues to neighbors
- Volunteer for whatever I could be involved in
- Like to attend RAB meetings and perhaps be a member of the RAB
- Participate in a debrief of focus group discussions
- Participate in an advisory role, perhaps evaluation or proposals, try to be objective about the process
- Become more active, attend more meetings, communicate with neighbors, "but as far as getting dirt under my nails, I don't know"
- Willing to sit on a citizen committee that oversees every aspect of the cleanup.

III. Information Sources

- Blue Light
- "Clean Air and Water" organization
- Center for Public Environmental Oversight (a San Francisco-based organization)
- Clean Air and Water Coalition
- Church groups (like St. John Berchman)
- Close family networks
- Communities Organized for Public Service (COPS)/Metro Alliance
- Wesley Community Center
- Elected officials
- Environmental groups
- Esperanza Peace and Justice Center
- Faith-based organizations and their social justice offices
- JOVEN (Community-base organization working with at risk youth)
- Neighborhood associations

- Neighborhood resource centers
- "Organic" movements led by local citizens, such as cultural arts, youth, or neighborhood groups
- Palm Heights Neighborhood Association
- Parties from both sides of the issue
- Residents Organized for a Safe Environment (ROSE)
- Retired military
- Schools/PTA organizations or connections
- Sierra Club
- Southwest Workers Union (SWU)
- State/local government

Preferred Communication Methods

Focus group participants offered two categories of advice for improving communication with the public. The first category consists of the information perceived by participants as most important to communicate. The second category is a list of recommended media and methods for delivering information about the cleanup program.

Information perceived as most important to communicate:

- Specific information on water quality past and present
- Mortality, birth rates/defects, special education referrals to schools
- Morbidity and mortality information for past 20 years in surrounding area
- Acknowledgement of responsibility from Air Force
- Specific cleanup plan details
- Public responses to questions and concerns
- Multi-lingual information
- Web site (but accessibility is a problem)
- Television (but sound bytes are not worth the time they take, not effective)
- Honest information about the problem
- What the Air Force is going to do (the plan)
- Information about how the Air Force is responding to legal actions
- Simple and straightforward
- Information about shallow groundwater safety..." the information I received was really helpful to me, it made me feel better"
- I don't know; need more information

No single communication method or medium distinguished itself as the top preference among the participants. Rather, participants suggested tailoring both information and presenters appropriate to the relevant audience and issue at hand. Methods or media preferred for communicating about the cleanup included:

- Directly from the Air Force
- Officially published reports
- Newspaper, television, radio
- Press release to all informational sources
- Bilingual brochures not appropriate

- Not Web site nor e-mail
- Public meeting isn't effective
- Community networking via newsletter given to schools, neighborhood organization, insert to local newspapers, churches, etc.
- Mail is best channel, but should be supplemented
- Bilingual: radio, television and mail – radio and television would be priority for Spanish-speaking community
- Documentary, but who would fund it?
- Hotline (we want more information about how many calls and their subjects and responses)
- Monthly newsletter in a question/answer format
- We working people don't have time for public meetings
- Church bulletins
- The elderly, who constitute a large number of the people in the affected communities, look forward to the postman coming.
- Television

Participants were asked to complete written questionnaires at the close of each focus group. Much of the information on the questionnaires is required for updating the CIP, and parallels the observations included here. The final question, however, asked participants where they get most of their information, and how accurate they perceived that information. Participants' top four sources of information, in terms of their accuracy, were:

1. Newspapers
2. Mail
3. TV news
4. Radio

Rated as somewhat less accurate (and less used as information sources) were educators, federal government spokespersons, friends or neighbors, San Antonio city spokespersons, clergy, and magazines.

Health professionals, elected officials, TV talk shows and state government spokespersons were rated as least accurate and were also used least as information sources. These ratings are representative only of the individuals who provided them, and should not be construed as directly representative of a larger population.

Figure A3-1: Former Kelly Air Force Base 2002 Community Involvement Plan
Community Questionnaire

Thank you for taking the time to participate in this interview. Through this interview, we hope to learn your thoughts and perceptions about of the Former Kelly Air Force Base environmental cleanup. Your participation will help shape a meaningful Community Involvement Plan, and will improve the Air Force's approach to sharing information with the community. All of your answers are confidential and your identity will not be disclosed.

Date:

Interviewer:

Interviewee name ID code:

1. What concerns you most about the Air Force's cleanup at Kelly? (identify at least three things)

_____ (# ____)

_____ (# ____)

_____ (# ____)

_____ (# ____)

_____ (# ____)

_____ (# ____)

2. Which of these is your greatest concern? Which is your second greatest concern? Third? Fourth? (and so on)

3. Are you aware of anything the Air Force is doing to address these concerns?

Yes No Don't Know

If YES, what Air Force activities are you aware of? (Obtain as comprehensive a list as possible.)

4. What role do you think the public should have in the cleanup at Kelly?

5. Would you like to participate in some way in the cleanup at Kelly?

Yes No Don't Know

If YES, how would you like to participate?

6. What role do you think the Restoration Advisory Board should have in the cleanup?

7. In addition to the Restoration Advisory Board, what community or cultural groups should help represent the public's interest in these issues?

8. If there was one thing that could help improve public trust in the Air Force, what would it be?

9. What information is **most important** to provide to the community about the cleanup at Kelly?

11. In your opinion, what is the most effective way to inform the *Spanish-speaking* **community** about the cleanup? (If possible, obtain specific processes or media names or channels.)

10. In your opinion, what is the most effective way to inform the **community as a whole** about the cleanup? (If possible, obtain specific processes or media names or channels.)

SmartBook – former Kelly AFB, TX

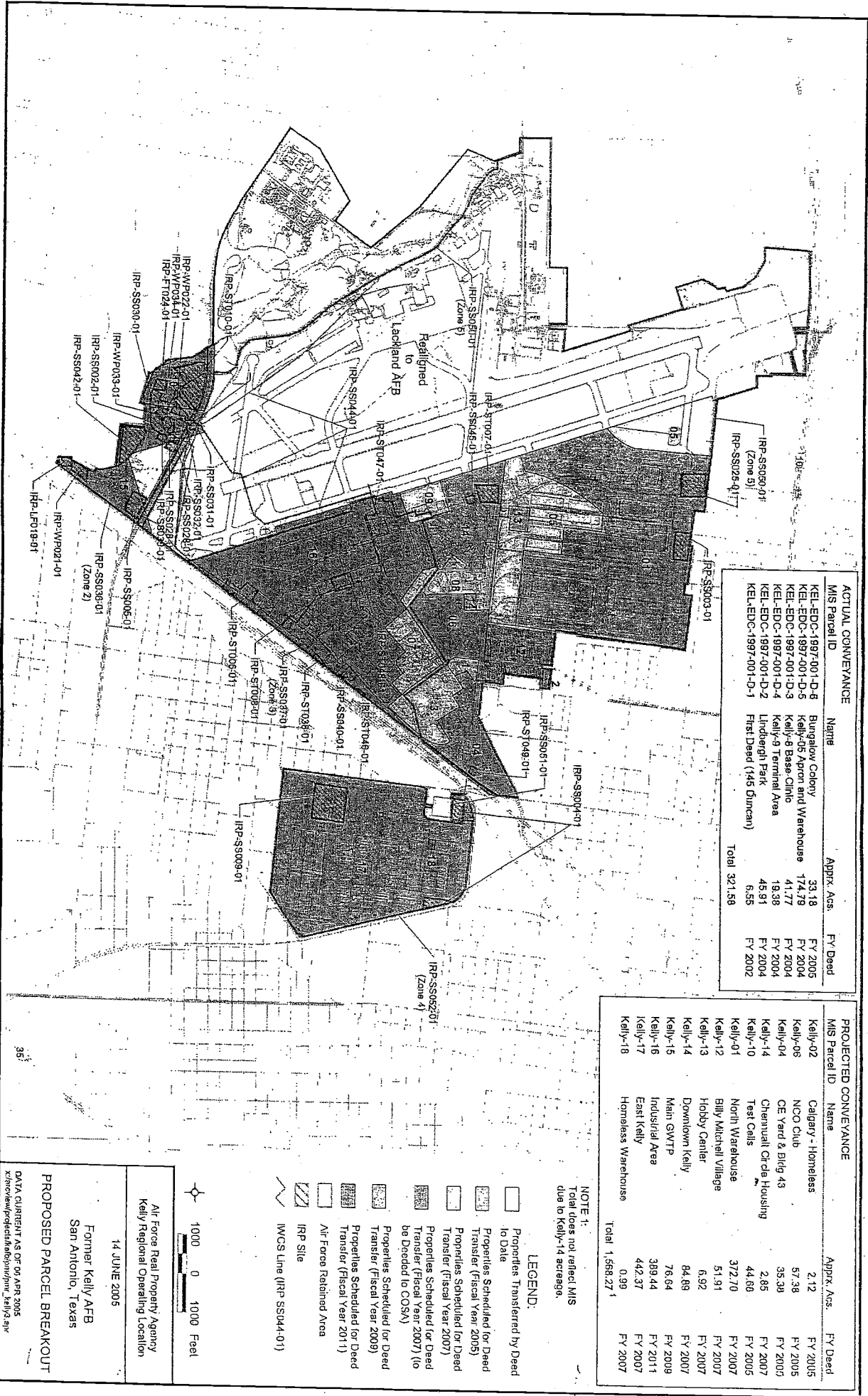
VI. Property Transfer

a. List of Property Transfers

See attached map.

b. List of Remaining Parcels & Anticipated Transfer Dates

See attached map.



ACTUAL CONVEYANCE		
MIS Parcel ID	Name	Apprx. Ass.
KEL-EDC-1997-001-D-8	Bungalow Colony	33.18
KEL-EDC-1997-001-D-5	Kelly-05 Apron and Warehouse	174.79
KEL-EDC-1997-001-D-3	Kelly-8 Base Clinic	41.77
KEL-EDC-1997-001-D-4	Kelly-9 Terminal Area	19.38
KEL-EDC-1997-001-D-2	Lindbergh Park	45.91
KEL-EDC-1997-001-D-1	First Deed (145 Duncan)	6.55
Total		321.58

PROJECTED CONVEYANCE		
MIS Parcel ID	Name	Apprx. Ass.
Kelly-02	Calgary - Homeless	2.12
Kelly-05	NCO Club	57.38
Kelly-04	CE Yard & Bldg 43	35.38
Kelly-14	Chennault Circle Housing	2.85
Kelly-10	Test Cells	44.60
Kelly-01	North Warehouse	372.70
Kelly-12	Billy Mitchell Village	51.91
Kelly-13	Hobby Center	6.92
Kelly-14	Downtown Kelly	84.89
Kelly-15	Main GWTP	76.64
Kelly-16	Industrial Area	399.44
Kelly-17	East Kelly	442.37
Kelly-18	Homeless Warehouse	0.99
Total		1,568.27

DATA CURRENT AS OF: 06 APR 2005
 X:\caweb\pfs\cal\map\proj\ar_3239.apr

PROPOSED PARCEL BREAKOUT

Former Kelly AFB
 San Antonio, Texas

14 JUNE 2005

Air Force Real Property Agency
 Kelly Regional Operating Location

Air Force Real Property Agency

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Community Involvement Plan and Outreach Update for the Former Kelly AFB



10 January 2006

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Introduction

- The Community Involvement Plan was developed to facilitate two-way communications with the community surrounding the former Kelly Air Force Base and encourage information sharing and community input in environmental restoration decisions.
- The CIP was revised between 2002 and 2004 with the current version dated April 2004.

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Introduction (continued)

- Objectives of this presentation are to describe:
 - Legal Public Affairs requirements and provide an overview of the environmental restoration process
 - The structure and organization of the CIP
 - Past community involvement efforts at Kelly
 - How information for the CIP was gathered
 - Key community concerns and needs as expressed by interviewees
 - Air Force Public Affairs initiatives
 - Future public involvement opportunities
 - Summary

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Legal Public Affairs Requirements

- The Comprehensive Environmental Response, Compensation and Liability Act, Resource Conservation and Recovery Act, and the Installation Restoration Program require public involvement in environmental restoration decisions and the property transfer process when specific milestones are approaching or have been reached.

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Public Affairs Requirements Overview (cont)

- Public Comment Period
 - According to 40 Code of Federal Regulations (CFR) 300, CERCLA Sections 117 and 122, and 28 CFR 50, the Air Force must:
 - Provide a reasonable opportunity, not less than 30 calendar days, for submission of written and oral comments on the proposed plan including the remedial investigation/feasibility study. Upon timely request, the lead agency will extend the comment period by a minimum of 30 additional days.

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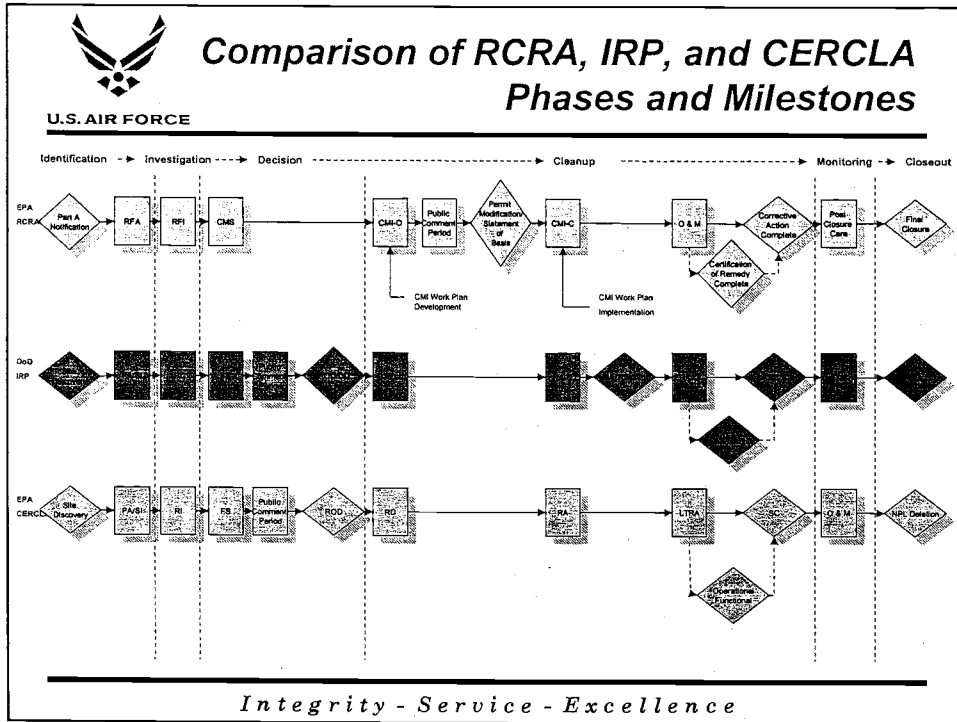


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Public Affairs Requirements Overview (cont)

- Public Notice
 - According to 40 CFR 300, the Air Force must place a public notice under the following circumstances:
 - For various removal actions including availability of engineering evaluation and cost analysis, and opening of Administrative Record and Information Repository
 - During stages of remedial investigation, feasibility study, and signing of the record of decision
 - During remedial design and remedial action including changes to the previous design, action, or settlement already proposed and commented upon by the public

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CIP Structure

Community Involvement Plan
for the
Former Kelly Air Force Base

April 2004

Air Force Real Property Agency/Division 6-2400
Fort Worth, TX

- Section 1: Overview
- Section 2: Kelly site history, description, and summary of cleanup activities
- Section 3: Community background
 - Community profile
 - History of community involvement
 - Community concerns
 - Communication needs
- Section 4: Community Involvement Plan
- Appendices:
 - Available community resources
 - Description of community interview methods

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Past Community Involvement Efforts at Kelly

- Technical Review Committee (TRC) prior to 1994
- Restoration Advisory Board (RAB) established in 1994 from the TRC
- Technical Assistance for Public Participation (TAPP) established in 1998
- Information Repository established in the early 1980's
- Publications
 - Community bulletins, information letters and fact sheets
 - Newsletters
 - Public notices
- Public Affairs
 - Requests for information
 - Elected officials and media
- Public Forums
 - Public Meetings
 - Public comment periods for remediation documents
 - Informational poster sessions

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CIP Information Gathering

- Focus groups - 21 participants
 - Made available on 5 evenings in convenient locations
 - No Air Force officials present
- Individual interviews – 11 participants
 - One-on-one question and answer sessions
- 32 total participants (including 7 RAB members)
- Interviews were completed in 2002 and interviewees were members of the local community, business owners and local elected officials.



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CIP Information Gathering (continued)

The interviews identified two general concerns and three specific priority issues to the community

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Two General Community Concerns

- Mistrust
 - A lack of trust in the Air Force
 - A lack of transparency in the cleanup process
 - Need for accurate and timely information
- Environmental communications
 - Dissatisfaction with current communication (RAB, letters, fact sheets)
 - Requests for more and different types of communication regarding the environmental process

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Three Specific Priority Issues

1. Public participation
 - Accessible opportunities
 - Appropriate representation
2. Health and Safety
 - Health problems thought to be related to contamination
 - Property values, environmental degradation and quality of life
3. Adequate cleanup plan
 - Timely, specific, sincere
 - Accountable and responsive to public questions and needs

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Public Participation and Cleanup Plan

- Historically the Air Force relied upon the RAB, public meetings, and information bulletins as the means for public participation and to communicate the cleanup plan



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Public Participation and Cleanup Plan Initiatives

- Door-to-door outreach and site tours for individuals, schools, and churches to convey information on remedies to be installed for specific IRP sites and to recruit for the RAB
- Toll-free telephone service enabling citizens to obtain accurate and timely information (866) 725-7617
- Mailing list
- Bilingual translator at RAB meetings
- Air Force representatives available to the public through poster sessions periodically in conjunction with public meetings and the RAB

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Health and Safety

- Historically the community has vocalized their concern about the potential health impacts of living near Kelly



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Health and Safety Initiatives

- Health and Safety initiatives in conjunction with and in response to the CIP:
 - Public Center for Environmental Health (PCEH)
 - Located at Brooks City-Base
 - \$5 million over 10 years given by the Air Force to develop scientific studies evaluating potential health impact of contamination from Kelly
 - Conducts air monitoring at off-base construction sites to ensure health and safety of the community are protected
 - Collaborates with the Air Force on the environmental cleanup
 - Other
 - ATSDR Health Risk Assessments (8)
 - Fruit and Nut Study
 - ALS Study
 - Mortality Study

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Health and Safety Initiatives (cont)

- Environmental Health and Wellness Center (EHWC)
 - EHWC provides free health assessments to the potentially affected community
 - EHWC location of the cochair library
- AFRPA Kelly Health Information Office (KHIO)
 - First of its kind in the Air Force
 - Provides health information to the community and addresses community health concerns

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Air Force Public Affairs Initiatives

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- The Air Force will continue to:
 - Facilitate the RAB
 - Maintain the Information Repository and Administrative Record
 - Respond to requests for information
 - Develop and distribute fact sheets, bulletins, and postcards
 - Publish and promote public comment periods
 - Host public meetings
 - Develop and distribute responsiveness surveys

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Future Public Involvement Opportunities

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- Where do we go from here?
 - Since all remedies have been installed, the role of community involvement will change
 - Future public notices, meetings, and comment periods will focus on permit modifications, long-term monitoring results (compliance plans), and five-year reviews
 - Example: The next public meeting is scheduled for 11 January 2005 at 6:30 pm at the Greater Kelly Development Authority offices. The subject of the meeting is the Class 3 Permit Modification.
 - The CIP will be updated to reflect the current status of Kelly's environmental program

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Summary

- The community expressed valid concerns during interviews associated with the CIP development regarding the need for increased trust and communications
- The Air Force implemented multiple changes above and beyond those required by laws and regulations in order to increase communications and bridge the gap in trust
- Remedy selection is complete and future community involvement will focus more on permit modifications, long-term monitoring results, and 5-year reviews



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**Technical Review Report
January 2005 Kelly USA
Semiannual Compliance Plan Report**

**Prepared by:
Patrick G. Lynch
Clearwater Revival Company¹**

Clearwater Revival Company (CRC) was asked to provide a layperson's explanation of the 2004 groundwater assessment contained in the January 2005 Semiannual Compliance Plan Report. CRC's was directed to:

- 1) Focus our review on the off-base impacts from Zones 2, 3, 4, and 5.
- 2) Identify gaps in locations of monitoring wells
- 3) Identify any trends in contamination
- 4) Respond to comments from the Technical Review Subcommittee

The Semiannual Compliance Report includes the results of groundwater samples collected from 473 wells and the interpretation of groundwater flow direction from measured groundwater elevations.

Contaminants of interest to the groundwater investigation at Kelly USA include:

Contaminant	Contaminant Source
Tetrachloroethylene (PCE)	Degreasing solvent
Trichloroethylene (TCE)	Degreasing solvent, breakdown product of PCE
1,2-Dichloroethylene (DCE)	Breakdown product of TCE
Vinyl Chloride	Breakdown product of DCE
Benzene	Component of Gasoline
Chlorobenzene	Paint remover
Arsenic	AF contends dissolved from soil due to high levels of groundwater pollution.
Chromium	Metal plating. AF contends stainless steel well screens are source.
Nickel	Component of jet fuel. AF contends stainless steel well screens are source.
Manganese	AF contends dissolved from soil due to high levels of groundwater pollution.

¹ Author contact information: Patrick G. Lynch, Clearwater Revival Company, 305 Spruce Street, Alameda, CA 94501. email: clearwater@toxicspot.com

CRC's review reached the following general conclusions:

- 1) Conclusions of the report can't be substantiated because of incomplete data reporting.
- 2) Concentrations of solvents are decreasing in close vicinity to groundwater recovery wells.
- 3) Concentrations of solvents in off-base areas not affected by treatment systems remain stable.
- 4) Many recently installed slurry walls and permeable-barrier reactors do not have adequate monitoring wells to evaluate their effectiveness.
- 5) Secondary contamination issues are impacting cleanup.

RESPONSE TO COMMENTS FROM TECHNICAL REVIEW SUBCOMMITTEE

Comments were received questioning the quality of the Compliance Plan Report and asking CRC's overall opinion of the report. CRC has an overall unfavorable opinion of the report. The Compliance Plan Report contains determinations on whether 14 Waste Management Areas (WMA) at Kelly USA comply with cleanup criteria, and these determinations can't be independently verified using information in the report. For example, the report determined WMA SA-2's groundwater complied with cleanup criteria. The data needed to confirm this determination, the sample results from the "point of compliance" wells at WMA SA-2, were not included in the report. Similar data omissions and inconsistent representations existed at other WMAs. While the Compliance Plan Report provides a snapshot of the extent of groundwater contamination and documents the operation and maintenance of treatment systems in place to reduce this contamination, the report needs substantial improvements in editing if the report is to be used to determine compliance with cleanup criteria.

Comments were received requesting an opinion of overall cleanup and recommendations to enhance the existing cleanup process. The contaminants concentrations in groundwater have been reduced within approximately 100 feet of groundwater recovery wells/trenches. No reduction in contaminant concentrations is evident in off-base areas. The data included in the report was collected prior to or soon after the installation of the permeable barrier reactors and therefore it is too soon to see if this technology will be effective at Kelly USA. In order to enhance groundwater cleanup, cleanup technologies need to be deployed throughout the off-base plume area.

Comments were received on whether any sampling for Agent Orange related compounds were reported in the Compliance Plan Report and whether any additional work was needed in Leon Creek. The Compliance Plan Report does not include results of sample analysis for components of Agent Orange: 2,4,5-T, 2,4-D and dioxin. However, a compound used to manufacture 2,4,5-T is present in Leon Creek fish tissue samples. The compound 1,2,4,5-tetrachlorobenzene was found in 5 of 31 fish tissue samples. Dioxin contamination in Agent

Orange is the result of manufacturing step involving the reaction of 1,2,4,5-tetrachlorobenzene to form 2,4,5-trichlorophenol. The presence of this compound in creek sediment and fish tissue is likely from a release of Agent Orange. Sampling for 2,4,5-T, 2,4-D, and dioxin as part of future Leon Creek assessments is recommended.

Comments were received asking whether groundwater contamination remained a danger. Absolutely. A single undocumented and abandoned well within the identified groundwater contamination plume could result in contamination of the deep aquifer used by San Antonio for drinking water. Shallow groundwater use could result in accumulation of the dissolved metals arsenic, nickel or chromium in irrigated soils. There is also a risk of exposure to solvent contamination as a result in indoor air infiltration. The groundwater cleanup criteria may not be protective for this route of exposure.

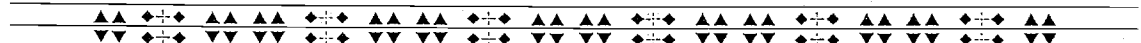
Comments were received concerning the monitoring of slurry walls and permeable barrier reactors. The monitoring needed at permeable barrier reactors is the same sample analysis currently used at the RCRA sites at Kelly USA. Sufficient monitoring wells are also needed to measure the groundwater flow rates through the reactor. Slurry wall monitoring requires a pair of wells located on either side of the wall for monitoring the difference in groundwater depths.

Comments were received concerning secondary contamination from manganese and arsenic. There is no cleanup criterion for manganese. Increases in dissolved oxygen in groundwater as a result of rainwater and irrigation infiltration will be required to reduce manganese concentrations in groundwater. Reduction of manganese concentrations will likely be required to remove dissolved arsenic. Arsenic does have a cleanup criterion and that criterion will be reduced from 50 µg/L to 10 µg/L in January 2006.

SECONDARY CONTAMINATION ISSUE

A number of the contaminants of concern have not been spilled or released at Kelly USA. DCE and vinyl chloride, for instance, are formed by the break down of PCE and TCE, two solvents widely used by the Air Force for aircraft maintenance. The chemical and biological processes that break-down PCE and TCE have also caused changes to the groundwater chemistry. These changes in groundwater chemistry have resulted in manganese dissolving from soils into groundwater at concentrations that exceed water quality standards. Complications with removing manganese delayed the operation of a Zone 5 groundwater treatment system.

The drinking water standards for both iron and manganese were not developed for health protection reasons but to protect bathroom fixtures and laundry from staining. When dissolved iron and manganese are exposed to oxygen in the air they are quickly oxidized. The oxidized iron and manganese form insoluble solids (that stain fixtures and laundry).



The break-down of PCE and TCE has depleted dissolved oxygen in groundwater. The lack of dissolved oxygen changes the valence of iron and manganese in soil, to a form that is soluble. This reaction is similar to the reactions that occur in permeable-barrier reactors that use zero-valent iron. The impact of high dissolved iron and manganese levels on the effectiveness of the permeable-barrier reactors needs to be evaluated.

The presence of arsenic above drinking water protection standards has been explained as a result of high concentrations of dissolved manganese. While this theory is not without merit, high levels of arsenic and high levels of dissolved manganese are not consistently found in the same sample locations. The drinking water protection standard for arsenic will change from 50 µg/L to 10 µg/L on January 23, 2006.

ZONE 2 EVALUATION

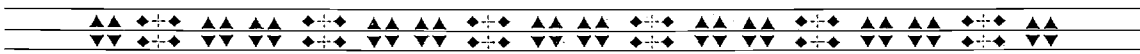
1. Off-base Impact

Zone 2 is located at the southern end of Kelly Air Force Base south of Military Highway. The site has been used for a number of waste management activities including waste water treatment plants, chemical evaporation pits, liquid waste incinerator, sludge drying beds, hazardous waste storage and ordnance disposal. Fire control training exercises may also have been conducted.

The primary off-base impact in Zone 2 is contaminated groundwater entering Leon Creek. Leon Creek surface water samples show the presence of PCE and TCE and the breakdown products DCE and vinyl chloride. PCE has consistently exceeded water quality criteria at sample location KY030SP003 where groundwater is seeping into the creek. A permeable-barrier reactor and slurry wall have been installed in the plume path 100 feet from Leon Creek to address this contamination that originates in Zone 3.

PCBs and N-nitrosodiethylamine, a chemical associated with military ordnance disposal, are found in fish tissue taken from Leon Creek. PCBs and N-nitrosodiethylamine were not detected in any groundwater samples.

Another water quality concern for Leon Creek is sufficient dissolved oxygen to support fish life. Surface water samples from Leon Creek have reported dissolved oxygen levels below the water quality standard of 5 mg/L dissolved oxygen. Groundwater with high levels of dissolved manganese and iron entering Leon Creek may be responsible for part of this oxygen deficit. In addition, some of the reported dissolved oxygen concentrations in the Leon Creek Assessment do not appear realistic, as they exceed reported solubility limits for oxygen.



2. Contamination Trends

Site E-3/SD-1

The contamination associated with the former chemical evaporation pit appears to be contained to an area 600 feet from Leon Creek. The RCRA Report graphs concentration trends for arsenic, chromium, nickel, chlorobenzene, PCE, and TCE in three wells from 199 to 2004. Chlorobenzene has been consistently measured at about 100 times the water quality standard.

While the concentrations of PCE and TCE observed in 2000 samples have decreased to near or below their drinking water standards, during the two most recent sampling events the concentrations of 1,2-DCE and vinyl chloride have increased.

SITE E-1

Site E-1 is also a former chemical evaporation pit. A groundwater recovery trench originally installed at the site was not installed to the depth of the Navarro clay and contamination was passing under the collection system. Vinyl chloride is found in two off-base wells downgradient of the collection system. Nickel and chromium were both reported at over 100 times the drinking water standard in off-base wells in 2001, but were reported below water quality standards in 2003 and 2004. Construction of the new groundwater extraction trench has damaged or restricted access to many monitoring wells, and these wells were not sampled for both the 2003 and 2004 Compliance Plan Report.

Site OT-1

Site OT-1, the former liquid incinerator, shows a small plume of PCE in 2004 that was not present during the 2003 sampling. This small plume may actually be part of the larger PCE plume migrating from Zone 3 into Zone 2.

Northbank

A permeable-barrier reactor and slurry wall have been added to an existing groundwater extraction system at the site. PCE and vinyl chloride in groundwater down-gradient of the reactor exceed water quality standards.

At the Northbank site groundwater was extracted at an average flow rate of 27 gallons-per-minute from July to December 2004. At this rate, within the 10 $\mu\text{g}/\text{L}$ contour for PCE, approximately 1.2 pounds of PCE is recovered by the system per year.

3. Monitoring Recommendations

Existing monitoring wells in the Northbank area are available for monitoring the permeable-barrier reactor. New wells are needed to monitor groundwater levels on each side of the associated slurry wall. The difference in groundwater levels on each side of the slurry wall is a measure of slurry wall's effectiveness.

The report's recommendation to restore the monitoring network at Site E-1 should be followed through with.

ZONE 3 EVALUATION

1. Off-Base Impacts

East of Zone 3, three contaminant plumes travel off-base from Kelly USA first beneath the rail yard and then residential neighborhoods. A fourth plume in Zone 3 originates in the Building 360/Building 361 area travels to the south towards Leon Creek entering Zone 2 and to the east where it may combine with the three off-base plumes.

Site MP

The Site MP groundwater plume travels 3 miles from the base boundary. A slurry wall surrounds the source area to contain contaminated groundwater. Groundwater elevations within the slurry wall are not significantly below groundwater elevations measured outside the wall. Groundwater extraction from inside the slurry wall would improve containment.

Site S-4

The plume of PCE and TCE has decreased in size as predicted by computer models. The amount of PCE, TCE, DCE and vinyl chloride has been reduced to the size of three city blocks. This contamination is within the groundwater drain installed by the City of San Antonio. Nickel is found above groundwater protection standards in a plume that extends from Site S-4 beyond the groundwater drain a distance of about a half-mile to the southeast of the base.

Site S-8

A plume of arsenic contaminated groundwater extends from Site S-8 to the east and off-base. The arsenic plume is not coincident with solvent contamination. With the exception of arsenic and manganese, contaminants are not found in off-base groundwater downgradient of Site S-8.

2. Contaminant Trends

Much of the change in the Site MP plume has been in the vicinity of Kelly USA where active groundwater extraction systems are in place. There has been little change to the off-base extent of PCE or TCE in historic plume comparisons from 1998 and 2004. During the same period the size of DCE and vinyl chloride plumes been reduced in off-base areas

Site S-4 has shown a decrease in the size of the PCE, TCE, DCE and vinyl chloride plumes off-base from 1998 to 2004. The plume reductions are consistent with computer modeling predictions. The plume of nickel contaminated groundwater has not shown significant changes.

For Site S-8, the RCRA Report graphs concentration trends for arsenic, benzene, chlorobenzene, and vinyl chloride in five wells from 1999 to 2004. Concentrations for all contaminants except vinyl chloride remained relatively constant.

3. Monitoring Recommendations

The depth to the Navarro Clay varies widely in the off-base area impacted by Site S-4. Sampling more of the existing off-base wells would provide greater confidence in the extent of contamination.

ZONE 4 (East Kelly) EVALUATION

1. Off-base Impacts

The off-base PCE and TCE plume originating from East Kelly extends three miles to the east to approximately the San Antonio River. There has been little change in the extent of the plume size from 1998 to 2004. A groundwater extraction trench was installed along the eastern and southern boundaries of East Kelly in 2000.

A solution of zero-valent iron has been injected into several off-base monitoring wells along Commercial Street.

2. Contamination Trends

Extraction and treatment systems at East Kelly and upgradient Site MP in Zone 3 have only been successful in reducing the concentrations of PCE and TCE within East Kelly. Only a few well-defined hot spots of contamination are left on base in Zone 4.



3. Monitoring Recommendations

Additional wells are needed to monitoring the effectiveness of injection of zero-valent iron along Commercial Street.

ZONE 5 EVALUATION

1. Off-Base Impacts

The highest groundwater elevations measured at Kelly USA are along the northern base boundary. Along the northern base boundary groundwater flows off-base to the north and west. A groundwater treatment system was installed at Site S-1 in 2004. High manganese levels in treated groundwater prohibited discharge for several months.

A permeable-barrier reactor is installed along the base boundary parallel to Imperial Street to address off-base impacts of TCE and a permeable-barrier reactor has been installed off-base along 34th Street to address PCE and TCE. The groundwater contamination extends from the north of the base in a western direction for a distance of three miles.

Nickel and chromium contamination are found in off-base groundwater in locations coincident with the off-base PCE plume.

2. Contamination Trends

With the exception of TCE, most contaminants had higher concentrations in off-base groundwater during recent sampling. Historical plume comparisons (1998, 2000, 2002 and 2004) for PCE and TCE sample event shows little change to the overall plume areas. Between 2002 and 2004 concentrations declined below the water quality standard in some areas of the three mile PCE plume. Further monitoring is needed to determine if this is a significant trend.

With the exception of the 34th Street area much of the off-base groundwater impacted from TCE in 2002 is reported as below the water quality standard in 2004.

3. Additional Monitoring Wells

Currently inadequate wells are available to monitor the 34th Street permeable-barrier reactor. Additional off-base wells are also needed to better determine the groundwater flow directions in the area west (upgradient) of the 34th Street permeable-barrier reactor.



GENERAL COMMENTS

1. Permeable-Barrier Reactors and Slurry Walls

Sufficient wells should be provided to monitor groundwater elevations near slurry walls and permeable-barrier reactors. In addition, monitoring wells are needed up- and down-gradient of reactors to monitor the reactors effectiveness as well as impacts to groundwater chemistry. This recommendation was made in a groundwater modeling report included in the Compliance Plan Report. The Compliance Plan Report indicates that 23 wells were installed to monitor the permeable barrier reactors at Buildings 360 and 361.

2. Groundwater gradient and plume maps

The accuracy of groundwater gradient and plume maps could be improved by reducing the time period in which measurements and samples are collected and reducing the distance between monitoring points. Groundwater elevations, which can effect sample results, increased by several feet during the months in which groundwater samples were collected because of rainfall. Greater care could be used in preparing gradient and plume maps. On one plume map (Figure M.2, Sheet 3 of 3) the contamination is depicted as being to the east of the wells where samples were collected.

3. Review limited by inconsistencies

CRC encountered numerous data discrepancies in completing our review. Appendix H reportedly contained a list of well samples used in the statistical analysis for each site. The number of samples in Appendix H often disagreed with the number of samples in Section 7 Tables where the statistical analysis results were reported. Section 5 included figures of wells used to monitor each Zone that are apparently outdated. Wells shown on these figures show little agreement with Table H and Section 7. CRC's review also indicated that some data points were not included on plume maps found in Appendix M and some analytical results were not included in the laboratory report provided in Appendix D.

4. Identifying Trends in Groundwater Contamination

Three sources of information were available to identify trends in groundwater contamination. The Compliance Plan Report contained a figure comparing historical PCE, TCE, DCE, and vinyl chloride plumes from 1998, 2000, 2002, and 2004. The report also contained tables summarizing the minimum and maximum concentrations detected in 2000 to 2004, and graphs showing concentration trends for a limited number of groundwater wells at three locations.

TAPP Compliance Plan Report Review
CONTRACT No. F41622-98-A-5882-0601

December 29, 2005
Page 10



The graphs were the best information for identifying trends but were provided for a limited number of wells. In one instance, however, a graph and the table summary show contradictory information. The plume maps were of limited use because of the scale of the figures. The table summaries may have been prepared each year using sample results from different wells so the trends identified using these tables may not accurately represent trends in contamination.

**KELLY USA
2004 GROUNDWATER ASSESSMENT
TAPP REVIEW**

**Patrick G. Lynch
Clearwater Revival Company**

Technical Review

- Provide an overall assessment
- Focus on off-base impacts
- Identify locations that need monitoring wells
- Identify any trends in contamination
- Respond to TRS comments

General Comments

Groundwater Balance for Kelly USA

Rainfall and Navarro Clay

Groundwater Extraction and Treatment

Improvement seen near pumping wells

Permeable-Barrier Reactors

Need adequate monitoring/new wells

Contamination distance from Kelly USA

Major plumes have traveled 3 miles

Groundwater Contaminants

- PCE

Tetrachloroethylene

- DCE

1,2-dichloroethylene

- Benzene

- Arsenic

- Chromium

- TCE

Trichloroethylene

- Vinyl Chloride

- Chlorobenzene

- Manganese

- Nickel

Finding Trends in Data

- Improvements near Recovery Wells permanent?
- Annual data sets used varying wells
- Incomplete and inconsistent data
- Scale of historical plume map comparison

Contaminant Concentration Trends

FIGURE 5.4
 Historical Trend Analysis of Chlorobenzene at Site E-3
 Former Kelly AFB, Texas

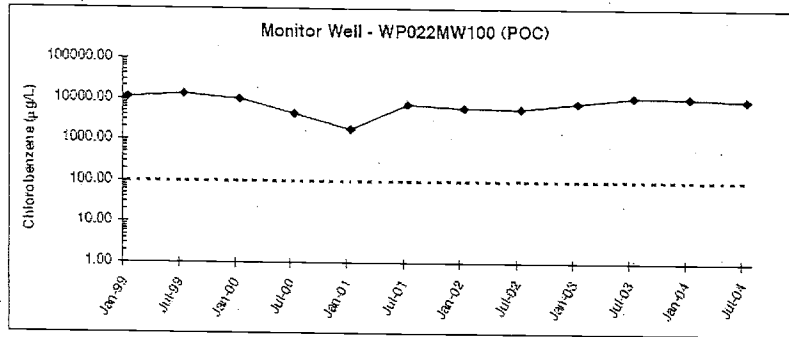
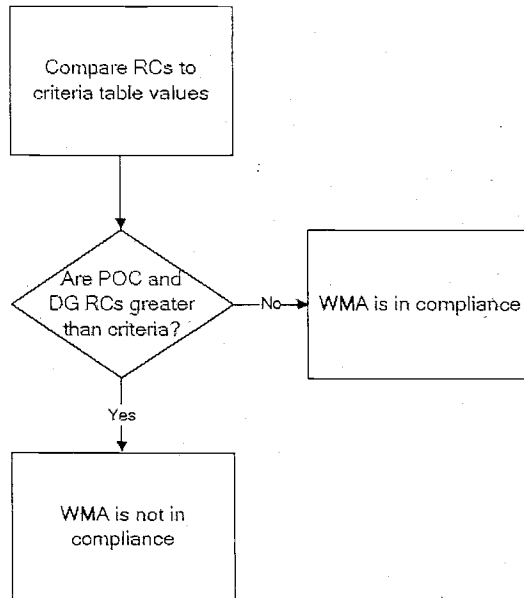


TABLE 5.5
 Historical Minimum and Maximum Concentrations for WMA E-3/SD-1
 Former Kelly AFB, Texas

Well Type	Parameter	GWPS	2000		2001		2002		2003		2004	
			MIN	MAX	MIN	MAX	MIN	MAX	MIN	MAX	MIN	MAX
POC	PCE	5	1U	1U	1U	1U	--	0.12J	1U	20U	1U	20U
POC	TCE	5	1U	1.2=	1U	0.48J	--	0.11J	0.1J	8.05J	1U	20U
POC	DOE	70	1.54=	5.5=	1U	18=	--	0.53J	0.28J	251=	0.49 J	218 =
POC	VC	2	1U	4.2=	1U	22=	--	1U	0.65J	230=	0.84J	957 =
POC	CB	100	1U	4,300=	1U	7300=	--	1U	88.4=	11,100=	18.9 =	9,510 =
POC	Bz	5	1U	290=	1U	280=	--	1U	2.72=	967=	0.48 J	1,040 =
POC	Aa	50	1.91U	70=	2.1U	117=	--	1U	8.5J	98.7=	2.95 J	43 =
POC	Cr	100	3.3UJ	3.8U	2U	4.2J	--	4.7J	1U	3.1U	0.669 U	1.92 J
POC	Mn	--	530=	630=	161=	379=	--	813J	966=	1080=	350 =	830 =
POC	Ni	100	22=	85=	29=	47=	--	51=	34.8=	41.4=	10.1 J	24 =



Quality of the Decision



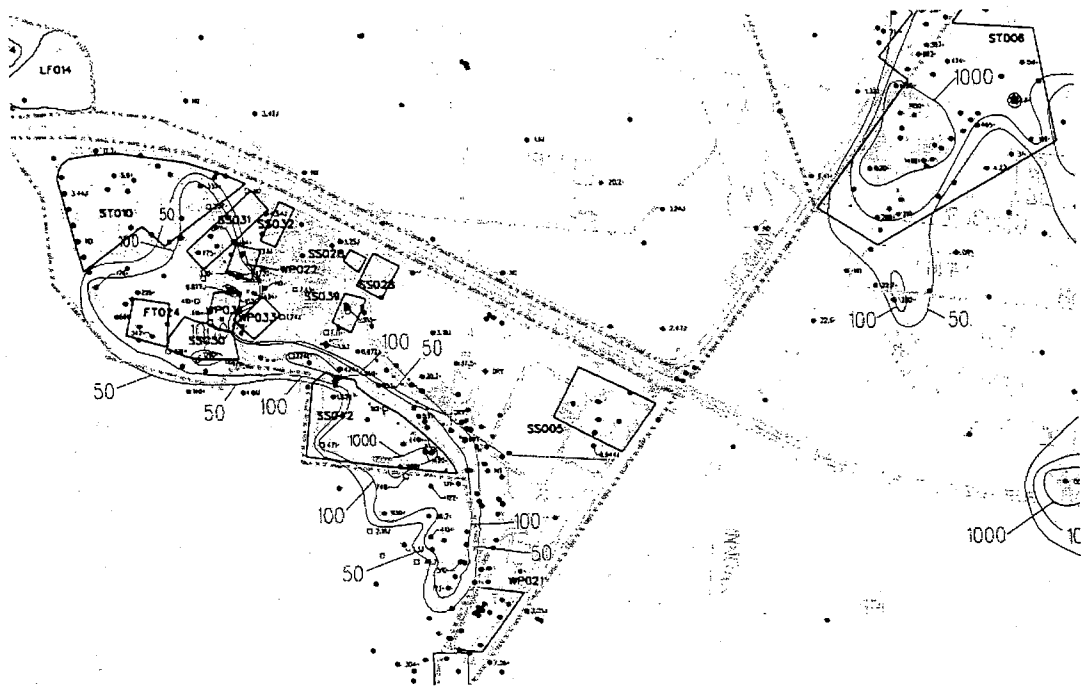
Acronyms

DG	Downgradient
FOND	Frequency of non-detect
POC	Point of compliance
RCs	Representative concentration
WMA	Waste management area

Site E-3/SD-1 Example

- Data reports for only 13 of 24 wells sampled
(compare Table D.3 with Figure M.1)
- No lab reports for sampled POC wells
- Downgradient wells
 - 15 wells shown on site plan - Figure 5.7
 - 7 wells sampled, Figure M.1
 - 2 wells used in compliance determination
- Many of sampled Corrective Action wells unrelated to site

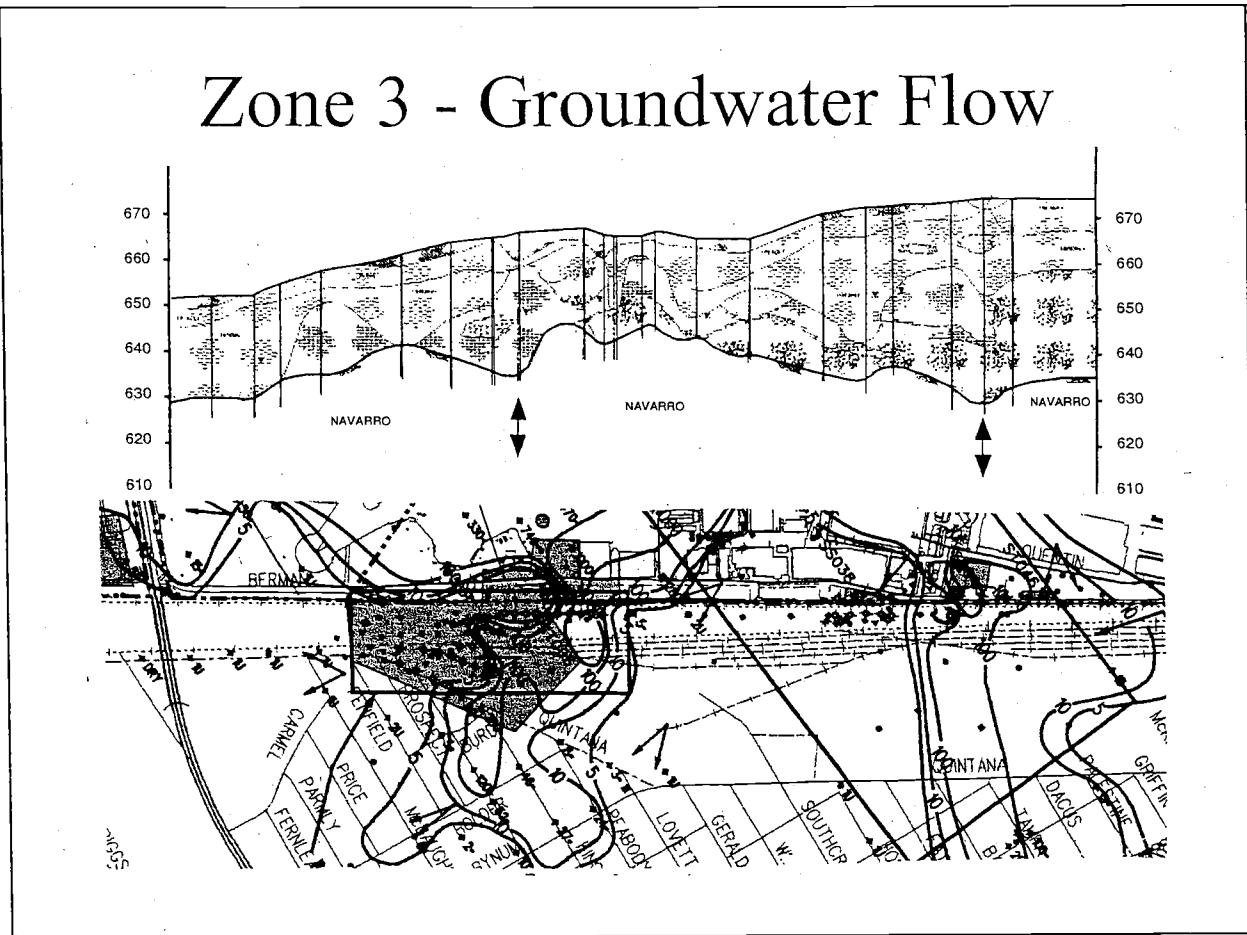
Zone 2 - Manganese Plume



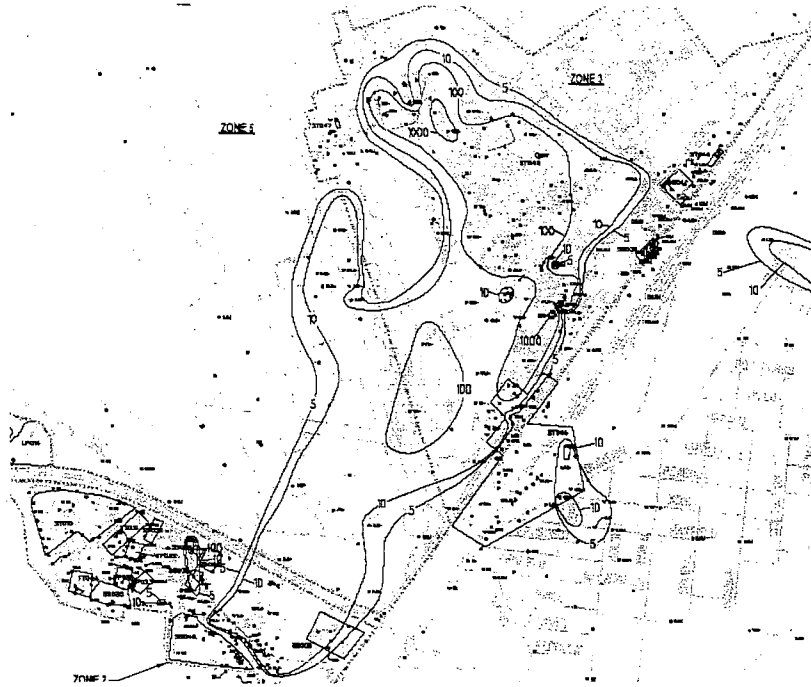
Agent Orange

- No specific sampling for 2,4,5-T and 2,4-D
- No dioxin sampling performed.
- 1,2,4,5-Tetrachlorobenzene in Leon Creek fish

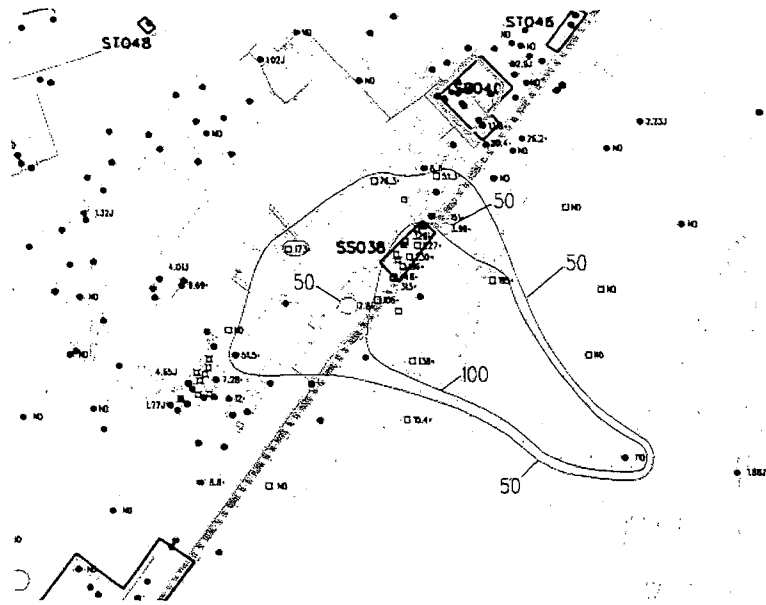
Zone 3 - Groundwater Flow



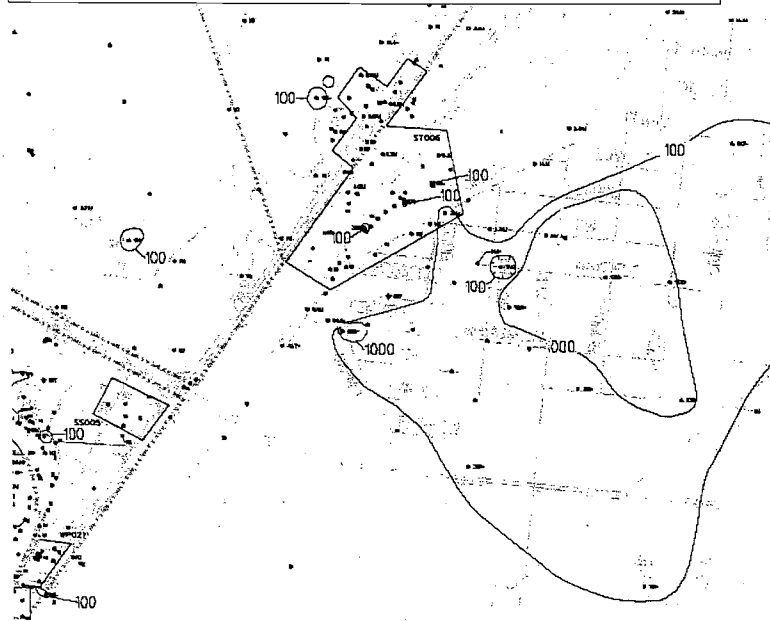
Zone 3 PCE Plume



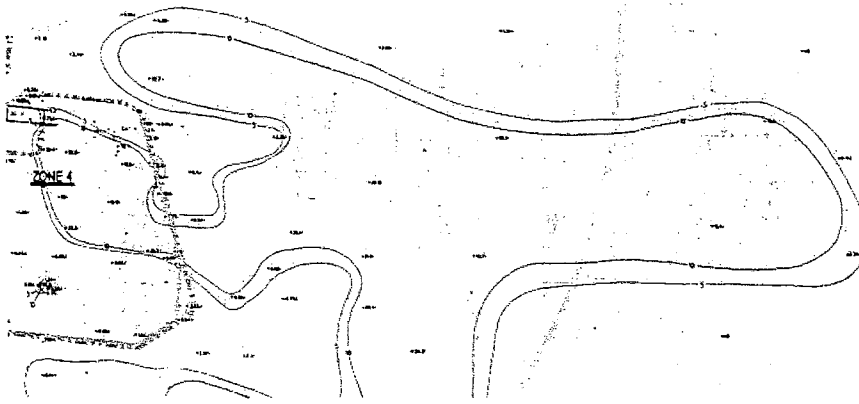
Zone 3 Arsenic Plume



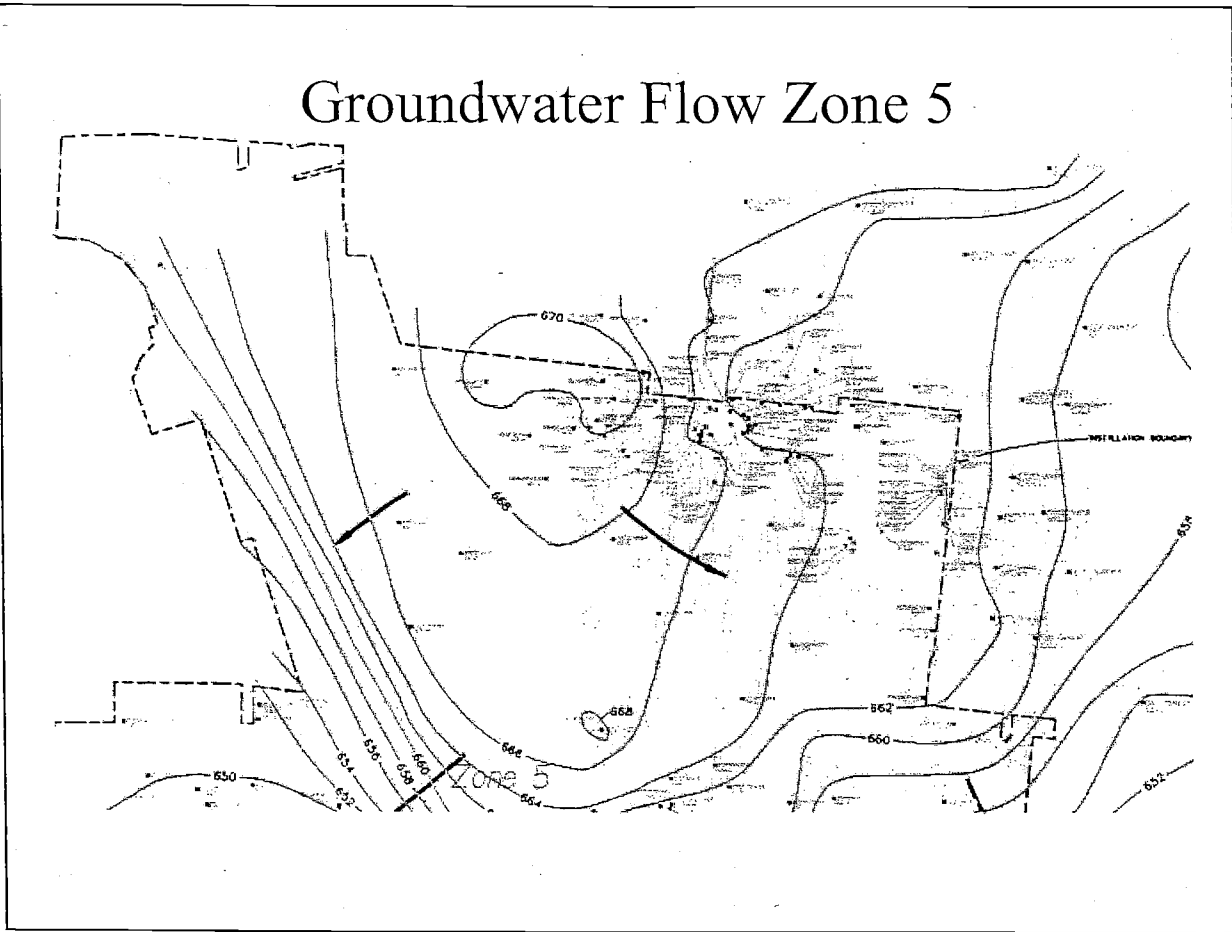
Zone 3 - Nickel Plume



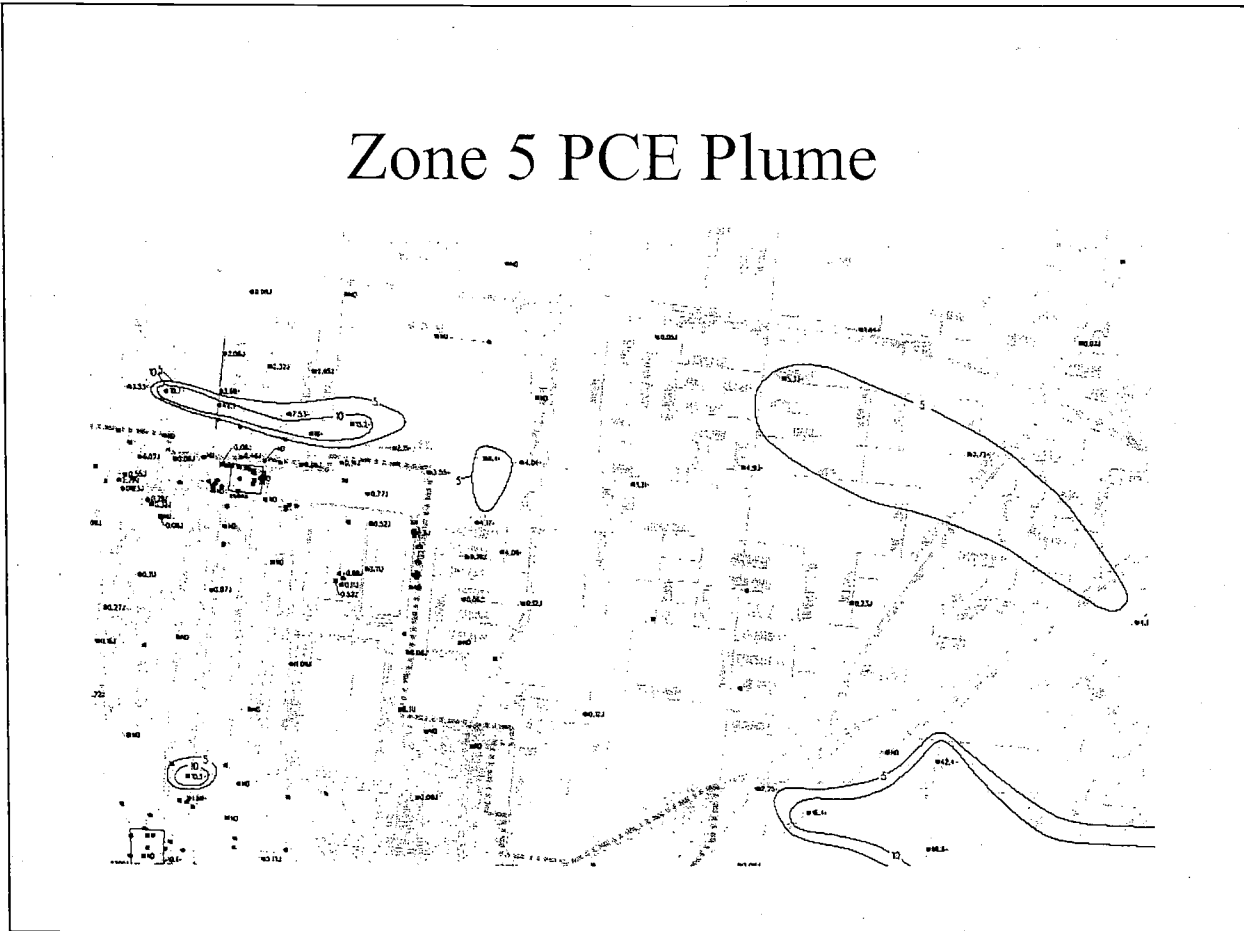
Zone 4 TCE Plume



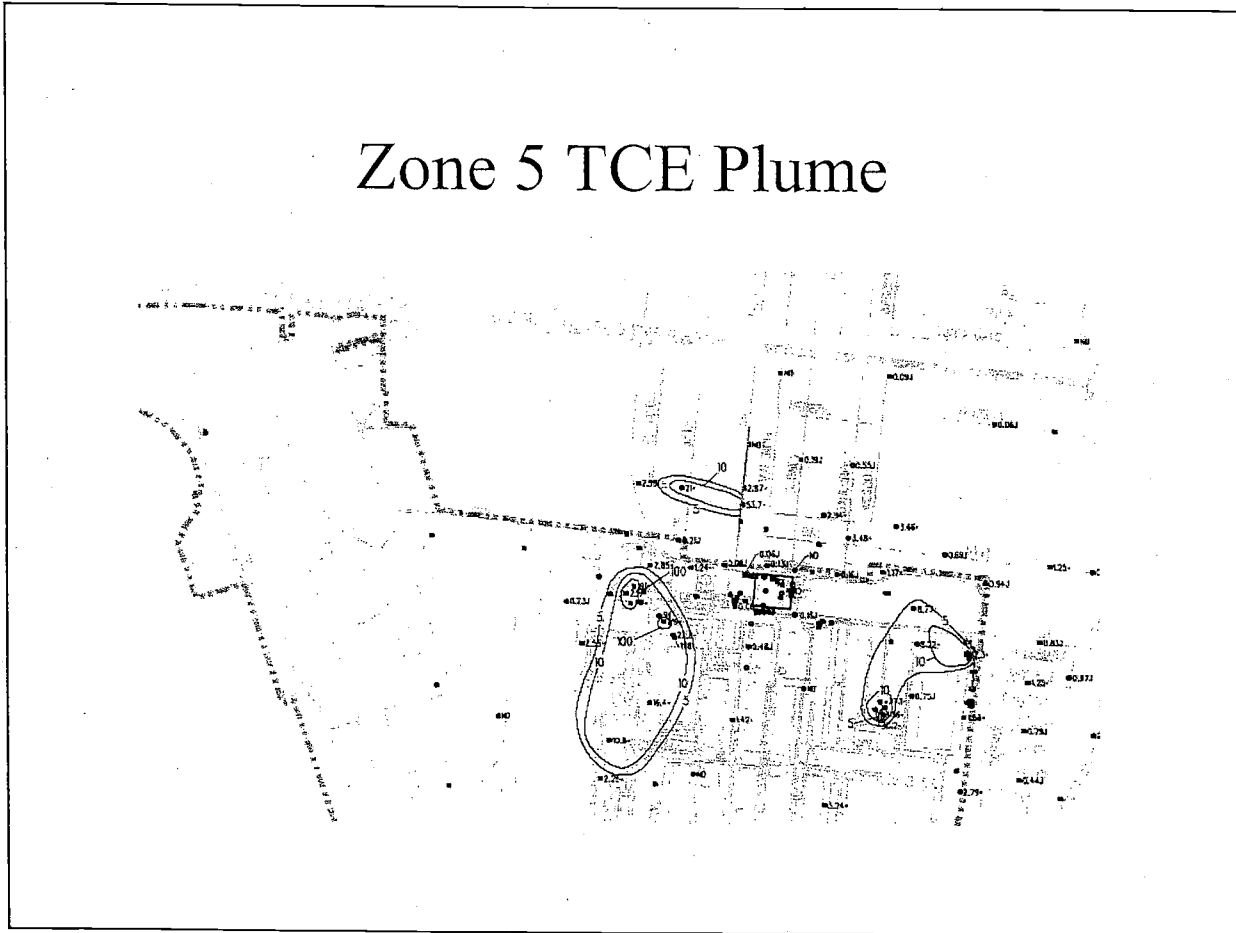
Groundwater Flow Zone 5



Zone 5 PCE Plume

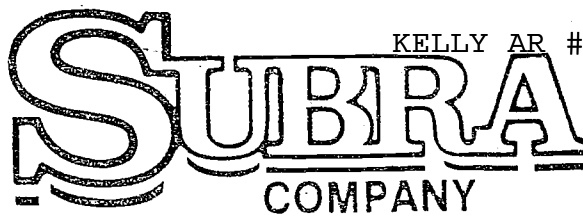


Zone 5 TCE Plume



Conclusions

- Monitor slurry walls and permeable-barrier reactors
- Evaluate data trends and make Compliance Decisions using complete/consistent data
- Reduce impacts of secondary contaminants



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**ENVIRONMENTAL CONTAMINATION
ASSOCIATED WITH
FORMER KELLY AIR FORCE BASE**

**Community Forum
November 18, 2004
San Antonio, TX**

**Prepared for: Southwest Workers' Union
Committee for Environmental
Justice Action**

**Prepared by: Wilma Subra
Subra Company
P. O. Box 9813
New Iberia, LA 70562**

KELLY AIR FORCE BASE SAN ANTONIO, TEXAS

Established **MAY 7, 1917**

Consist of a **4,660 ACRE** complex

Oldest Continuously Active airfield in the US
Air Force

Primary Mission

Support the San Antonio Air Logistics Center

Provided large-scale logistics support to the
worldwide US Air Force installations

Managed aircraft engines, weapons systems,
support equipment and aerospace fuel

Historical Environmental Contaminated Sites were
identified and restoration activities initiated in
1982 under the Installation Restoration Program

Base Realignment and Closure (BRAC) Commission
recommended Kelly Air Force Base for
realignment and closure in 1995

Kelly Air Force Base was closed July 13, 2001

CONSTITUENTS OF CONCERN IN GROUND WATER

Arsenic - Known Human Cancer Causing Agent

Benzene - Known Human Cancer Causing Agent

Chlorobenzene - Liver and Kidney Damage

Chromium VI - Known Human Cancer Causing Agent

1,2-DCE (1,2-Dichloroethene) - Possible Human
Cancer Causing Agent

Nickel - Possible Human Cancer Causing Agent

PCE Tetrachloroethene - Liver and Kidney Damage

TCE Trichloroethene - Liver and Nervous System
Damage

Vinyl Chloride - Known Human Cancer Causing Agent

Leon Creek

Leon Creek Surface Water Exceeding Criteria

Chromium	Mercury*	Silver
Cyanide	PCB 1260*	TCE*
Dieldrin	PCE	*January 2004

Leon Creek Sediments Exceeding Criteria

Arsenic	Chrysene*
Barium	Fluoranthene
Cadmium	Phenanthrene*
Chromium	Pyrene
Copper	Chlordane
Lead	DDD
Mercury	DDE
Nickel	DDT
Silver	Methoxychlor
Zinc	PCB 1016*
Benzo(a)anthracene*	PCB 1254
Benzo(a)pyrene*	PCB 1260
Benzo(b)fluoranthene*	

*Sampled January 2004

Leon Creek Fish Tissue Exceeding Criteria

PCB 1254
PCB 1260

Leon Creek Fish Tissue Chemicals Detected

Metals

Chromium

Mercury

Copper

Selenium

Lead

Semivolatile Organics

3,4-Methylphenol

Hexachlorobenzene

Benzo(a)anthracene

Hexachloroprene

Polychlorinated Biphenyls

PCB 1016

PCB 1254

PCB 1260

Pesticides

Aldrin

Heptachlor

alpha-BHC

Heptachlor Epoxide

beta-BHC

DDD

Chlordane

DDE

Dicofol

DDT

Dieldrin

Mirex

CONTRACT NO. F41624-00-D-8021-0230

0104
FINAL

JANUARY 2004 SEMIANNUAL COMPLIANCE PLAN REPORT (07/03 - 12/03)
PART I: INTRODUCTION

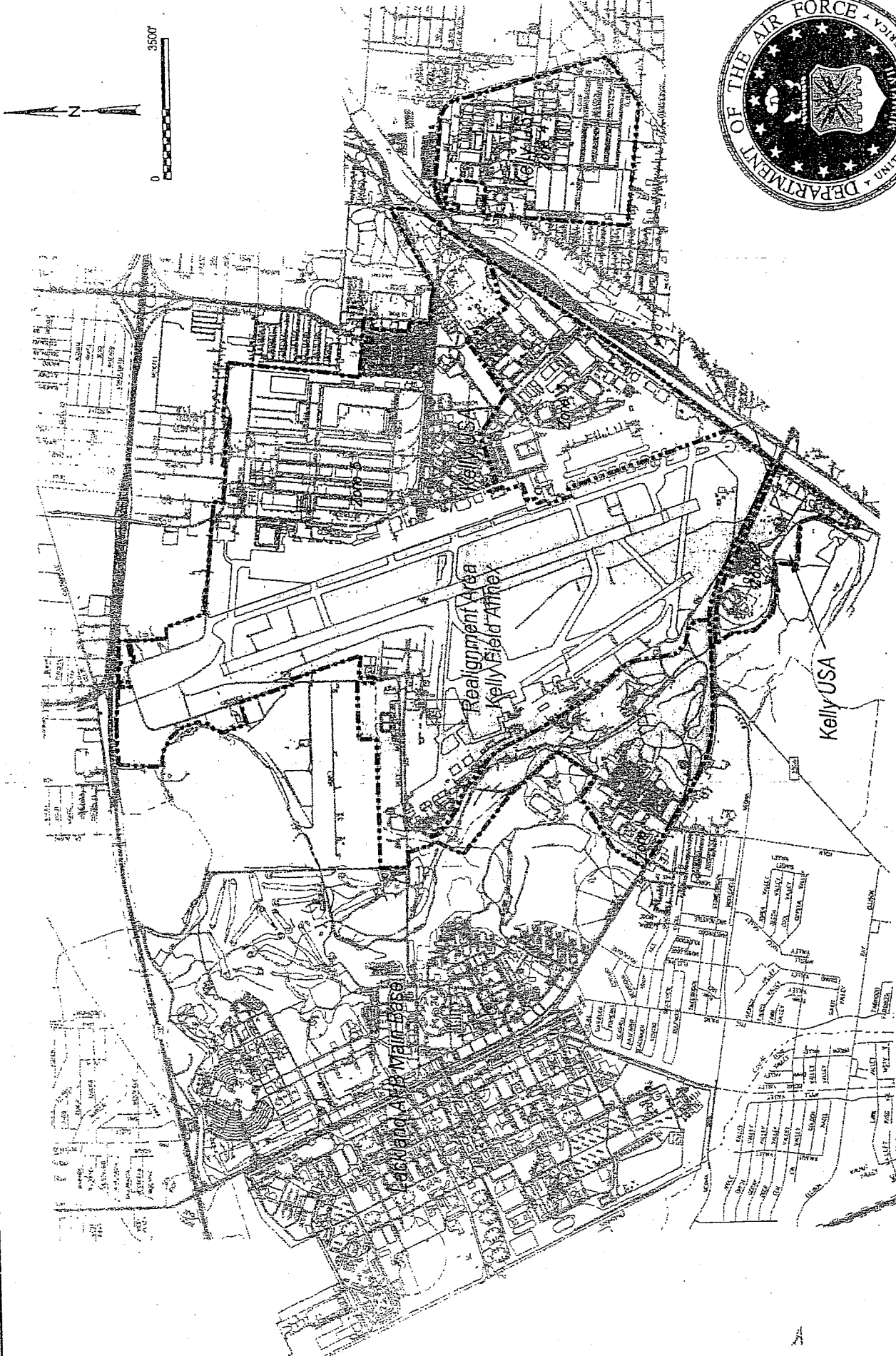


EXHIBIT 1.3
 Map of IRP Zones
 Former Kelly AFB, Texas

CH2MHILL

Kelly Air Force Base consist of a 4,660 acre complex

The complex was divided into 5 ground water zones which included 52 Compliance Plan sites associated with past base operations and 14 former waste management areas.

Zone 1 Western Part of Kelly

152 sites: Landfills

Lumber Burn Area

Waste Oil Evaporation Pits

Sludge Disposal/Spreading Areas

Groundwater Constituents of Concern

Antimony

Nickel*

Arsenic*

Organics

Benzene*

PAHs

Chlorobenzene

PCE

Chromium*

Pesticides

Cresol

PCBs

1,2-DCE*

Phenols

1,4-Dichlorobenzene*

Lead

TCE*

Manganese*

Vinyl Chloride*

*Exceed Ground Water Protection Criteria

Zone 2 Southern Tip of Kelly

16 Compliance Plan Sites (including 3 RCRA sites):

- Maintenance Storage Area
- Hazardous Waste Storage Area
- Storage Lagoon and Spreading Area
- Liquid Waste Incineration
- Jet Engine Test Cells
- Chemical Evaporation Pits
- Sludge Drying Beds

Groundwater Constituents of Concern

- | | |
|---------------|-----------------|
| Arsenic* | PAHs |
| Benzene | PCBs |
| Chlorobenzene | PCE |
| Chromium | TCE |
| 1,2-DCE* | TPHs |
| Metals | Vinyl Chloride* |
| Nickel* | |

*Exceed Ground Water Protection Criteria

Zone 3 Southeastern Part of Kelly

9 Compliance Plan Sites:

- Former Metal Plating Shops
- Fuel Spill Area
- Underground Storage Tanks

Groundwater Contaminants of Concern

Arsenic*	Nickel*
Benzene*	PAHs
Chlorobenzene*	PCE*
Chromium	TCE*
1,2-DCE	Vinyl Chloride*

*Exceed Ground Water Protection Criteria

Zone 4 East Kelly - Annex located east of Main Base

2 Active Sites

2 Closed Sites

Storage and Industrial Wastewater

Collection System Operations

Groundwater Contaminants of Concern

Arsenic*	PCE*
1,2-DCE*	TCE*
Nickel*	Vinyl Chloride*

*Exceed Ground Water Protection Criteria

Zone 5 All Areas in the Central Part of the Base
20 Units - Former Buildings
Spill Areas

Groundwater Contaminants of Concern

Arsenic*	Organics
Benzene	PAHS
Chlorobenzene	PCE*
Chromium	TCE*
1,2-DCE	TPH
Nickel*	

*Exceeds Ground Water Protection Criteria

GROUND WATER

Ground Water Surficial Aquifer - 3 to 37 feet below
land surface at Kelly

Ground Water Recharge : precipitation/infiltration
infiltration from some
areas along Leon Creek

Regional Ground Water Flow - into the Kelly base
from the north

CHLORINATED HYDROCARBONS IN GROUND WATER

PCE, TCE, 1,2-DCE and Vinyl chloride are the most frequently detected and widespread organic compounds in the ground water.

The chlorinated hydrocarbons have been used as industrial solvents at Kelly and the groundwater plumes are located throughout much of the Kelly facility and off site.

DEGRADATION PROCESS

PCE → 1,2-DCE → VINYL CHLORIDE

TCE → 1,2-DCE → VINYL CHLORIDE

CONTRACT NO. FA18140-0-001-0200

JANUARY 2004 SEMIANNUAL COMPLIANCE PLAN REPORT (0703-1247)
PART IV: AIR QUALITY ASSESSMENT
AND STATISTICAL EVALUATION

8100
RUAL



NOTES:

1. The plume extent was generalized from and interpolated between sample locations. Information on the plume extent is only at the specified locations.
2. All samples were collected in April/May 2003.
3. Concentrations are dashed where inferred.
4. Contours are drawn at the GWPS.



EXHIBIT E.2
 EXHIBIT OF TCE and PCE in the Surficial Aquifer above Regulatory Standards
 April/May 2003
 Former Kelly AFB, Texas

CHESTER HILL

The ground water plumes of PCE, TCE and 1,2-DCE extend across most of Zones 2, 3, 4 and the southern most area of Zone 5 on Kelly and off base to the southeast of Zone 3 and east and southeast of Zone 4.

The former metal plating shops of site SS040 are thought to be responsible for the extensive off site plumes of chlorinated organic chemicals.

INTERIM GROUND WATER RECOVERY SYSTEMS

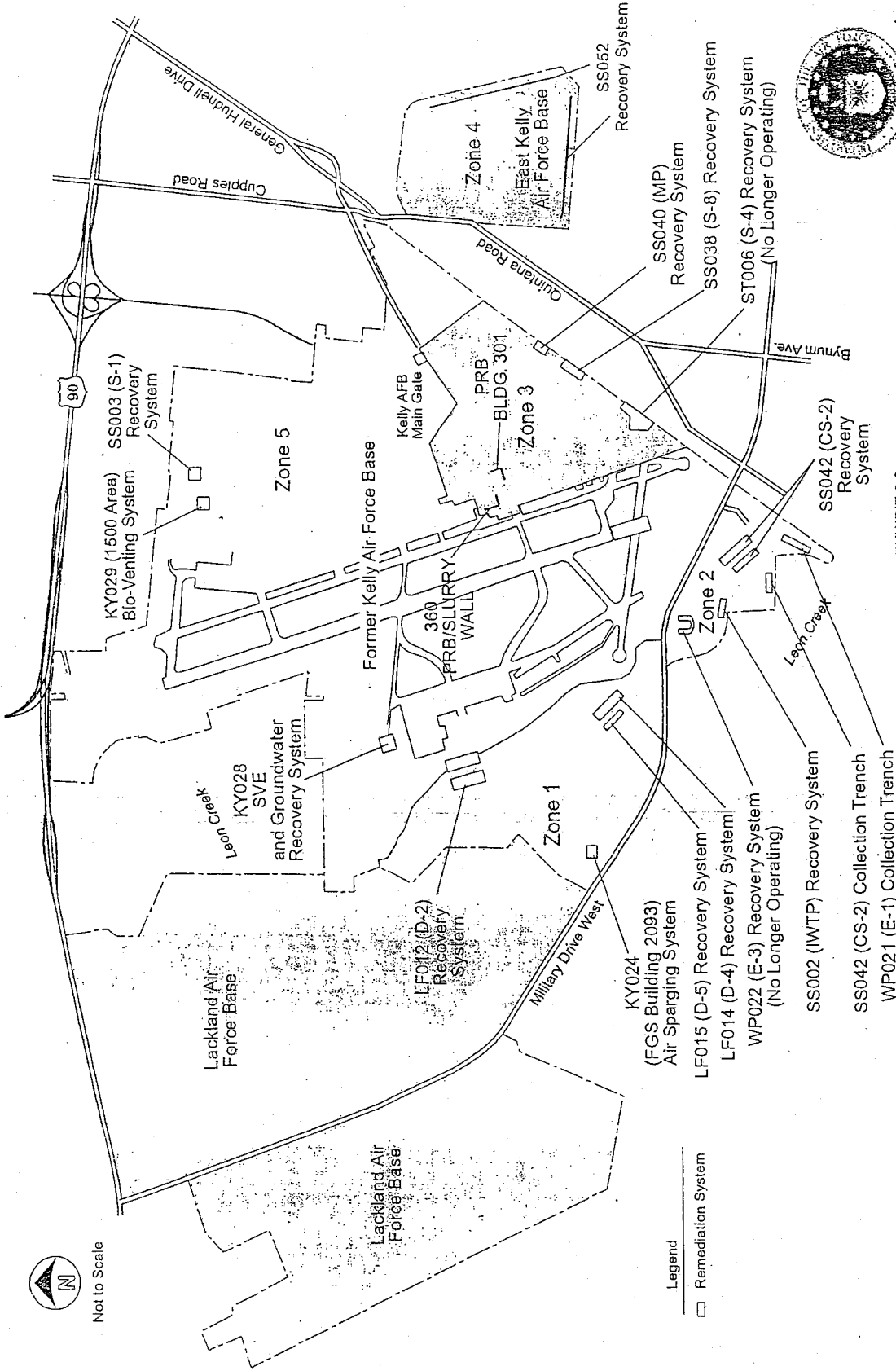
There are 15 Interim Ground Water Recovery Systems in Zones 1-5 of the Kelly facility. The Interim Recovery Systems in Zone 1 (3 systems) and Zone 2 (4 systems) are designed to mitigate impacts to Leon Creek and prevent additional down gradient and off base migration of contaminated groundwater.

The Interim Ground Water Recovery Systems in Zone 3(4 systems), Zone 4 (1 system) and Zone 5 (one of three systems are designed to mitigate down gradient and off base impacts. The other two systems in Zone 5 are to treat contaminated soil.

CONTRACT NO. F41624-00-D-8021-0230

01/04
FINAL

JANUARY 2004 SEMIANNUAL COMPLIANCE PLAN REPORT (07/03 - 12/03)
PART IV: ANNUAL SWMU ASSESSMENT
AND STATISTICAL EVALUATION



Not to Scale

Legend
□ Remediation System



EXHIBIT 6.2
Interim Groundwater Recovery System Locations
Former Kelly AFB, Texas

CH2MHILL

Light Nonaqueous -Phase Liquid-LNAPL- Contamination

Site SS002, Zone 2 - Former Industrial Wastewater Treatment Plant

Designed in the 1930's to treat raw sanitary wastewater. In the 1970's began receiving industrial wastes. Ground water contaminated with TCE and Arsenic. LNAPL thickness 0.83 feet.

Site SS038/RCRA S-8, Zone 3 - Former fuel spill area and former location of an underground petroleum-oil-lubricants tank farm.

Constructed in 1941. In the mid-1950's an Automated Engine Parts Cleaning Facility was constructed and the underground storage tanks converted to storing chlorinated solvents, and rust and carbon removers. Ground water contaminated with PCE, TCE, 1,2-DCE, and Benzene. LNAPL Thickness 0.25 feet and 1.33 feet.

Passive removal of LNAPL - checked on a monthly basis and skimmed to remove hydrocarbon layer in the wells.

Location is adjacent to site SS 040 - two former metal plating shops responsible for off site chlorinated organic ground water plumes.

Site KY062 - Zone 3

LNAPL Thickness 2.45 feet.

CORRECTIVE MEASURE STUDY FOR ZONES 2 & 3

April 20, 2004

SITE E-1 ZONE 2

Site: Former chemical evaporation pit used for disposal of chromium sludge, contaminated fuels and oils, hazardous solvents, acid sludge

Current use: Equipment storage yard

Chemicals of Concern:

Surface Soil

TCE

Vinyl Chloride

Subsurface Soil

PCE

Bis(2-ethylhexyl)phthalate

DCE

1,2-Dichlorobenzene

TCE

1,4-Dichlorobenzene

Vinyl Chloride

Benzo(a)pyrene

Pentachlorophenol

11 Heavy Metals

Methylene Chloride

Current Interim Action

Interceptor Trench

Recommended Remedy

-Excavation of soil in the vadose zone with additional limited soil excavation in the saturated zone

-Continued operation of existing ground water interceptor trench

BUILDING 522 - ZONE 2

Site: Overhaul/test facility for large aircraft radomes. Solvents, adhesives, sealants, coatings, blasting materials and petroleum products were used on the site. The building was demolished in 1997.

Chemicals of Concern:

Subsurface Soil: TCE (down to 32 feet below surface)

Current Interim Action

Soil Vapor Extraction (SVE), air injection and vapor extraction

Recommended Remedy

-Bioaugmentation and optimized soil vapor extraction

-Optimize existing soil vapor extraction system to facilitate removal of contamination mass in vadose zone

FORMER BUILDING 301 - ZONE 3

Site: Degreaser pit, plating area, sumps, container storage area

Chemicals of Concern:

Soil - PCE

Interim Action - Permeable Reactive Barrier

Recommended Remedy

-Thermally enhanced soil vapor extraction (six-phase heating) will reduce the source material

-Maintenance of permeable reactive barrier

BUILDING 360 - ZONE 3

Site: Sumps, Industrial waste collection lines

This building is a tenant-occupied building

Chemicals of Concern

Surface Soil: PCE

Subsurface Soil: PCE, 1,2-DCE, TCE

Interim Action-Permeable Reactive Barrier

Recommended Remedy

Soil Vapor Extraction in north west corner

Bioaugmentation in former basement area

FORMER BUILDING 258 - ZONE 3

Site: Degreaser, Industrial Wastewater Collector System

Site currently asphalt parking lot with slurry wall surrounding the source area

Chemicals of Concern:

Subsurface Soil: PCE, TCE, 1,1,2-Trichloroethane
Dense Nonaqueous Phase Liquid (DNAPL) on top of the Navarro clay - DNAPL layer a few inches to several feet thick, estimate 13,000 gallons

Interim Action-Slurry Wall installed May 1999 to isolate the DNAPL and contain contaminated groundwater

Recommended Remedy

DNAPL liquid extraction

Groundwater recovery within the slurry wall

BUILDING 324 - ZONE 3

Chemical of Concern - Subsurface Soil - PCE

Recommended Remedy

Soil Vapor Extraction to remove contamination mass

BUILDING 348 - ZONE 3

Site: Oil Water Separator and Calibration Fluid Spill

Chemicals of Concern

Subsurface Soil - PCE

Light Non-Aqueous Phase Liquids (LNAPL) -

Thickness 0.02 to 3.19 feet - 62,000 gallons

Recommended Remedy

Vapor extraction for removal of organic mass in
the soil in the area of the former Oil Water
Separator

Passive Bailing of LNAPL for source removal
(mechanical skimmer)

ZONES 2 AND 3 GROUNDWATER

Solvent plume area linking groundwater Zones 2, 3, and 5.

Chemicals of Concern in Groundwater

PCE, TCE, Cis-1,2-DCE, Vinyl Chloride, Chromium

Recommended Remedy

Replacement of CS-2NB groundwater recovery wells with a permeable reactive barrier/slurry wall system along Leon Creek

Chromium bioremediation in high chromium area of Zone 2

Remedy is to prevent groundwater migration of contamination off-base

ZONE 4

Metal Plating Source Area (MP) - 1952 and 1961

Buildings converted to Metal Plating Operations

Buildings demolished in 1980-1981

Currently an asphalt paved parking lot

Site SS051 Source Area - Industrial Waste Collection

System - underground piping system formerly

used to transfer industrial wastewater

Chemicals of Concern

Metal Plating - PCE, DCE, TCE, Vinyl Chloride,
Benzene, Arsenic, and Chromium

SS051 - PCE, DCE, TCE, Vinyl Chloride, Chromium

Off Site Contamination - Plume of PCE and TCE

Metal Plating Plume extends eastward and
southeastward approximately 4.5 miles
off-base

SS051 Plume extends eastward off-base to the
San Antonio River

Recommended Remedy

On-Base - Source Areas Existing Source Control
Systems

Off-Base Plume Remedy - Vertical Extraction

Wells in areas of low groundwater gradient

-Permeable Reactive Barriers

ZONE 5 (54% OF KELLY AFB)

Site: Warehouse Area, Waste Oil Storage,
Underground Storage Tanks, Solvent Still

Interim Remedial Action

Minimize Off-Base migration of VOCs and Metals
in the Ground Water

Recommended Remedy

- Plume A - On and Off-Base TCE - Enhanced
Bioremediation at Source Area
Permeable Reactive Barrier at Base Perimeter
- Plume B - Off-Base PCE - Permeable Reactive
Barrier at Source Area
- Plume C - Chlorobenzene - Soil Vapor Extraction
with air filtration (in-place)
Pump and Treat (in-place)
- Plume D - TCE, PCE, 1,2-DCE - Enhanced
Bioremediation
- Plume F - PCE, TCE - Monitored Natural
Attenuation
- Plume H - TCE - Monitored Natural Attenuation
- Plume J - PCE, TCE - Monitored Natural
Attenuation
- Plume K - Chlorobenzene - Monitored Natural
Attenuation

LEON CREEK

Leon Creek is 45 miles long and drains 237 square miles of land in western Bexar County. Leon Creek enters the main portion of the former Kelly Air Force Base from the northwest near the intersection of Billy Mitchell Road and Westover Road. A total of 3.5 miles of Leon Creek flows through and adjacent to the former Kelly Air Force Base. This portion of Leon Creek receives direct inflow from numerous effluent and stormwater discharge pipes, several ground water seeps, and ground water infiltration.

31 Stations Sampled in Leon Creek Exceeded Pollution Criteria

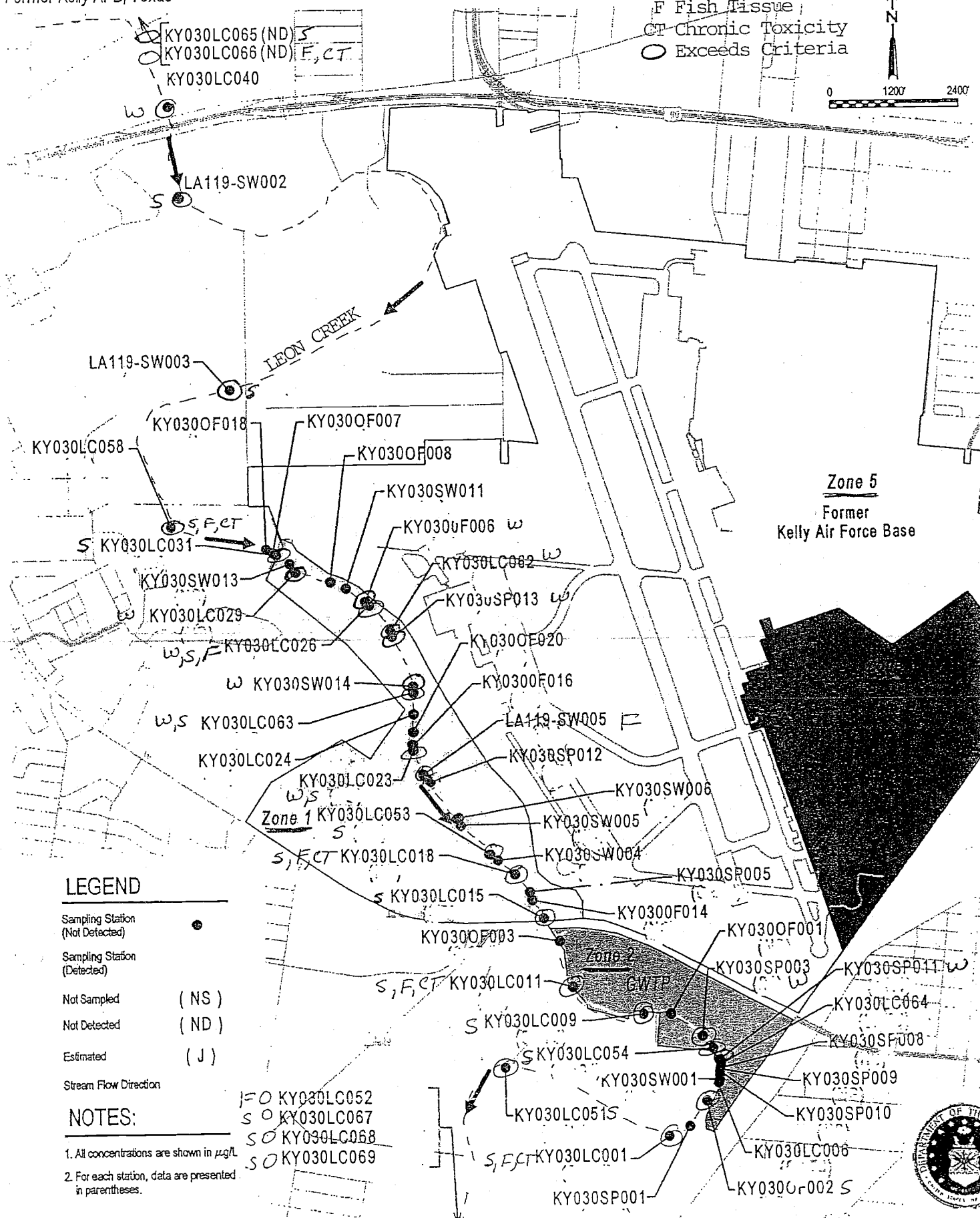
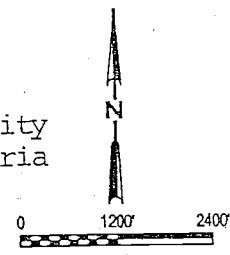
Surface Water	Sediment	Fish Tissue	Chronic Toxicity
C040	LA119-SW002	C001	C066
C026	C058	C011	C058
C062	C031	C018	C018
C063	C026	C026	C011
C023	C063	C066	C001
SP003	C054	C052	
SP011	C053	C058	
C069*	C018	LA119-SW005	
C029*	C015		
F006*	C011		
SW005*	C009		
SW014*	C023		
SP013*	C001		
	C051		
	C067		
	C068		
	C069		
	F002		
	SW003*		
	C065*		

*Sampled January 2004

EXHIBIT 5.2

Leon Creek
Former Kelly AFB, Texas

W Surface Water
S Sediment
F Fish Tissue
CT Chronic Toxicity
O Exceeds Criteria



LEGEND

- Sampling Station (Not Detected) ●
- Sampling Station (Detected) ○
- Not Sampled (NS)
- Not Detected (ND)
- Estimated (J)
- Stream Flow Direction →

NOTES:

1. All concentrations are shown in µg/L
2. For each station, data are presented in parentheses.

FO KY030LC052
S ○ KY030LC067
S ○ KY030LC068
S ○ KY030LC069



LEON CREEK EXCEEDENCE CHEMICALS AND NUMBER OF STATIONS

SURFACE WATER - Exceedence of TWQS Freshwater Criteria - 13 Stations Exceeded

In-Stream Stations - 8 Stations Exceeded

Pesticides

Dieldrin - 4 Stations Exceeded (C026, C062, C063 and C023) - Human Health and Chronic Aquatic Life Protection

Metals

Silver - 1 Station Exceeded (C040) - Acute Aquatic Life Protection

*Mercury - 6 Stations Exceeded (C023, C026, C029, C062, C063, SW005) - Human Health Protection

*PCB1260 - 1 Station Exceeded (C069) - Human Health and Chronic Aquatic Life Protection

*Collected January 2004

Ground Water Seeps and Outfalls - 5 Stations
Exceeded

Metals

- Chromium - 1 Station Exceeded (SP003) -
Human Health, Acute and Chronic
Aquatic Life Protection
- *Mercury - 3 Stations Exceeded (SP013, F006,
SWO14) - Human Health Protection
- Cyanide - 1 Station Exceeded (SP003) -
Chronic Aquatic Life Protection

VOCs

- PCE - 2 Stations Exceeded (SP003 & SP011)-
Human Health Protection
- *TCE - 1 Station Exceeded (SP011) - Human
Health Protection

*Collected January 2004

LEON CREEK

The four VOC Contaminants of Concern PCE, TCE, DCE, and Vinyl Chloride were detected in the In-Stream surface waters of Leon Creek, primarily in Zone 2. However, all VOC concentrations in the Leon Creek In-Stream Surface Water Samples were below the TWQS Freshwater Criteria.

Chemical	Detected
DCE	57% of Stations
TCE	29% of Stations
PCE	25% of Stations
Vinyl Chloride	18% of Stations

SEDIMENT - Exceedences of TWQS Sediment Quality Guidelines

In-Stream Sediment Stations - 19 Stations Exceeded Metals

Arsenic - 8 stations	PCBs
Barium - 2 stations	*PCB 1016 - 2 sta.
Cadmium - 10 stations	PCB 1254 - 7 sta.
Chromium - 14 stations	PCB 1260 - 7 sta.
Copper - 7 stations	Pesticides
Lead - 15 stations	Chlordane - 1 sta.
Mercury - 1 station	DDD - 5 stations
Nickel - 6 stations	DDE - 8 stations
Silver - 9 stations	DDT - 11 stations
Zinc - 8 stations	Methoxychlor - 1 sta

Semi-VOC

- *Benzo(a)anthracene - 1 station
- *Benzo(a)pyrene - 1 station
- *Benzo(b)fluoranthene - 2 stations
- *Chrysene - 1 station
- Fluoranthene - 3 stations
- *Phenanthrene - 1 station
- Pyrene - 3 stations

*Sampled January 2004

Out-Fall Station Sediment - 1 Station Exceeded -F002

Metals

- Cadmium - 1 station
- Chromium 1 station
- Copper - 1 station
- Lead - 1 station
- Mercury - 1 station
- Nickel - 1 station
- Silver - 1 station
- Zinc - 1 station

Pesticides

- *DDD - 1 station
- *DDE - 1 station
- *DDT - 1 station

PCBs

- *PCB 1254 - 1 sta.
- *PCB 1260 - 1 sta.

*Sampled January 2004

LEON CREEK FISH TISSUE SAMPLING

11 Stations Sampled

9 Species Collected

Channel Catfish

Spotted Bass

Redbreasted Sunfish

Warmouth

Bluegill

Grey Redhorse

Redbreasted Bluegill

Longear Sunfish

Green Sunfish

Chemicals Detected in Whole Body Fish Samples

Semivolatile Organic Compounds - 4 chemicals

3,4 Methylphenol

Benzo(a)anthracene

Hexachlorobenzene

Hexachlorophene

Pesticides - 12 chemicals

Aldrin

alpha-BHC

beta-BHC

Chlordane

Dicofol
Heptachlor
Heptachlor Epoxide

DDD

DDE

DDT

Mirex

PCBs - 3 chemicals

PCB-1016

PCB-1254

PCB-1260

Metals - 5 chemicals

Chromium

Copper

Lead

Mercury

Selenium

FISH TISSUE EXCEEDED TCEQ SCREENING LEVELS

PCB 1254 and PCB 1260

C001 Below Zone 2

Channel Catfish
Spotted Bass

C011 Zone 2

Redbreasted Sunfish
Spotted Bass

C018 Zone 1

Bluegill
Redbreasted SunfishLA119-SW005
Zone I

Green Sunfish

C026 Zone 1

Redbreasted Sunfish

PCB 1254

C066 Above Zone 1

Redear Sunfish

PCB 1260

C058 Above Zone 1

Largemouth Bass
Redbreasted Sunfish

C052 Below Zone 2

Spotted Bass

FISH SPECIES COLLECTED FROM LEON CREEK

Station No.	Fish Species
C001	Channel Catfish Spotted Bass Redbreasted Sunfish
C011	Spotted Bass Redbreasted Sunfish Warmouth
C018	Largemouth Bass Bluegill Redbreasted Sunfish
C028	Largemouth Bass Redbreasted Sunfish Warmouth
C052	Spotted Bass Grey Redhorse Redbreasted Bluegill

C058

Largemouth Bass
Bluegill
Redbreasted Sunfish

C060

Largemouth Bass
Redbreasted Sunfish
Longear Sunfish

C066

Bluegill
Channel Catfish
Redbreasted Sunfish

C070

Largemouth Bass
Redbreasted Sunfish
Bluegill

C071

Spotted Bass
Redbreasted Sunfish
Bluegill

LA119-SW005

Green Sunfish
Redbreasted Sunfish
Largemouth Bass



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

JAN 01 2006

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

Dear Ms. Sandra Converse

I would like to take this opportunity to thank you for your service to the former Kelly Air Force Base (AFB) Restoration Advisory Board (RAB) in 2004 and 2005.

The Air Force values input from all stakeholders and I personally appreciate the time and service you devoted to the Kelly community as an involved RAB member. Together, we have worked to protect human health and the environment through the Air Force's environmental remediation program on the former Kelly AFB and in the surrounding community.

I look forward to the day the Air Force completes the environmental remediation program at the former Kelly AFB and know that our success will come because of involved citizens such as you.

I am honored to have served with you on the Kelly RAB and wish you much success in your future endeavors.

Sincerely

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

ADAM G. ANTWINE
Senior Representative



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

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

JAN 01 2006

Dear Mr. Henry Galindo

I would like to take this opportunity to thank you for your service to the former Kelly Air Force Base (AFB) Restoration Advisory Board (RAB) in 2004 and 2005.

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ADAM G. ANTWINE
Senior Representative



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AIR FORCE REAL PROPERTY AGENCY

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

JAN 01 2006

Dear Mr. George Rice

I would like to take this opportunity to thank you for your service to the former Kelly Air Force Base (AFB) Restoration Advisory Board (RAB) from 1994 to 2005.

The Air Force values input from all stakeholders and I personally appreciate the time and service you devoted to the Kelly community as an involved RAB member. Together, we have worked to protect human health and the environment through the Air Force's environmental remediation program on the former Kelly AFB and in the surrounding community.

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ADAM G. ANTWINE
Senior Representative



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AIR FORCE REAL PROPERTY AGENCY

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

JAN 01 2006

Dear Mr. Mike DeNuccio

I would like to take this opportunity to thank you for your service to the former Kelly Air Force Base (AFB) Restoration Advisory Board (RAB) from 2002 to 2005.

The Air Force values input from all stakeholders and I personally appreciate the time and service you devoted to the Kelly community as an involved RAB member. Together, we have worked to protect human health and the environment through the Air Force's environmental remediation program on the former Kelly AFB and in the surrounding community.

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ADAM G. ANTWINE
Senior Representative



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

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

JAN 01 2006

Dear Mr. Pete Musquiz

I would like to take this opportunity to thank you for your service to the former Kelly Air Force Base (AFB) Restoration Advisory Board (RAB) in 2004 and 2005.

The Air Force values input from all stakeholders and I personally appreciate the time and service you devoted to the Kelly community as an involved RAB member. Together, we have worked to protect human health and the environment through the Air Force's environmental remediation program on the former Kelly AFB and in the surrounding community.

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Sincerely

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ADAM G. ANTWINE
Senior Representative



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

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

JAN 01 2006

Dear Ms. Carol Vaquera

I would like to take this opportunity to thank you for your service to the former Kelly Air Force Base (AFB) Restoration Advisory Board (RAB) in 2004 and 2005.

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Sincerely,

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

ADAM G. ANTWINE
Senior Representative

CURRENT

01/04/2006

News Briefs

'Grits' is a meaty prison blog

Grits for Breakfast, the Koufax Award Winner for Best Single Issue Blog in 2004, has recently joined the Texas Criminal Justice Coalition's stock of reform and civil-liberties projects. The blog covers police interactions with the public, the state of local jails and prisons, the overflowing and almost-capped probation system, and has plenty of biting commentary and credible research. Activist Scott Henson runs the site, and states on the opening page, "All opinions are my own. The facts belong to everybody."

One of the numerous postings includes those of CrimProf, also known as Mark Godsey, who runs the Innocence Project at the University of Cincinnati Law School. Look for Godsey's explanation of a DNA-based exoneration, as discussed on his recent *Larry King Live* appearance. The site also offers information on why the president of the Rio Grande Valley Chamber of Commerce opposes the border wall and commentary from a blogger who works in the Texas construction trades and doesn't think development would be possible without illegal immigrant labor.

Also listed are daily blogs to check, such as "In the Pink Texas," which, in a recent posting, tsk-tsked the *Express-News* for "falsely reporting that the Texas Court of Criminal Appeals agreed to hear Tom DeLay's money laundering case.... [because] they relied on Delay's spokesman Kevin Madden." A multitude of resources pertaining to various political, economic, and social issues brewing within the Lone Star State and elsewhere are also available. Info: <http://gritsforbreakfast.blogspot.com>.

— Francesca Camillo

Report bears little good news for Kelly cleanup

The cleanup of environmental contaminants at the former Kelly Air Force Base continues to be problematic with persistent contaminant plumes, ineffective monitoring, and discrepancies in data, according to findings by the California-based Clearwater Revival Company.

Clearwater recently issued its conclusions about the status of groundwater contamination at the former base, using data contained in the Air Force's January 2005 Semiannual Compliance Plan report.

The company's findings will be released at a meeting of the base's Restoration Advisory Board, Tuesday, January 10, at 6:30 p.m. at the Kennedy High School cafeteria, 1901 S. General McMullen.

Contaminants found in the groundwater on base, in Leon Creek, and under nearby residential neighborhoods include those from degreasing solvents, gasoline components, and paint removers, as well as arsenic, chromium, nickel, and manganese.

The Clearwater review concluded that while concentrations of solvents close to the groundwater wells are decreasing, the amount of chemicals found off base that aren't being treated remain the same.

According to Clearwater maps, an arsenic plume persists in the groundwater beneath the southeast portion of the base and extends off-base to a portion of Quintana Road near Hollenbeck Avenue and an alternative school. A groundwater plume tainted with high levels of nickel encompasses an area south of SW Military

Drive at Luna Court, northeast to Crittendon, and continuing southwest to include portions of Bynum, Fenfield, McLaughlin, and Price Streets.

Monitoring has shown that the contamination isn't affecting drinking water from the Edwards Aquifer.

Yet, a plume of PCE and TCE extends from East Kelly three miles to near the San Antonio River; contaminated groundwater continues to seep into Leon Creek. PCE levels have consistently exceeded water quality standards at one sampling location. A fish advisory was issued in 2004 because fish-tissue samples revealed high levels of PCBs, a cancer-causing chemical, and another contaminant associated with military ordnance disposal. Six hundred feet from Leon Creek, levels of chlorobenzene have been measured at 100 times the water-quality standard.

Air Force contractors also recently installed slurry walls and permeable-barrier reactors, which are supposed to contain or neutralize the contaminants. These systems don't have adequate monitoring wells to evaluate their effectiveness, the report stated. In one area, levels of PCE and vinyl chloride downhill from the reactor exceed water quality standards.

On a positive note, the report found that an off-base plume of PCE, TCE, DCE, and vinyl chloride has been reduced to the size of three city blocks.

- Lisa Sorg

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KELLY USA
2004 GROUNDWATER ASSESSMENT
TAPP REVIEW

Patrick G. Lynch
Clearwater Revival Company

Technical Review

- Provide an overall assessment
- Focus on off-base impacts
- Identify locations that need monitoring wells
- Identify any trends in contamination
- Respond to TRS comments

General Comments

Groundwater Balance for Kelly USA

Rainfall and Navarro Clay

Groundwater Extraction and Treatment

Improvement seen near pumping wells

Permeable-Barrier Reactors

Need adequate monitoring/new wells

Contamination distance from Kelly USA

Major plumes have traveled 3 miles

Groundwater Contaminants

- PCE

Tetrachloroethylene

- DCE

1,2-dichloroethylene

- Benzene

- Arsenic

- Chromium

- TCE

Trichloroethylene

- Vinyl Chloride

- Chlorobenzene

- Manganese

- Nickel

Finding Trends in Data

- Improvements near Recovery Wells permanent?
- Annual data sets used varying wells
- Incomplete and inconsistent data
- Scale of historical plume map comparison

Contaminant Concentration Trends

FIGURE 5.4
 Historical Trend Analysis of Chlorobenzene at Site E-3
 Former Kelly AFB, Texas

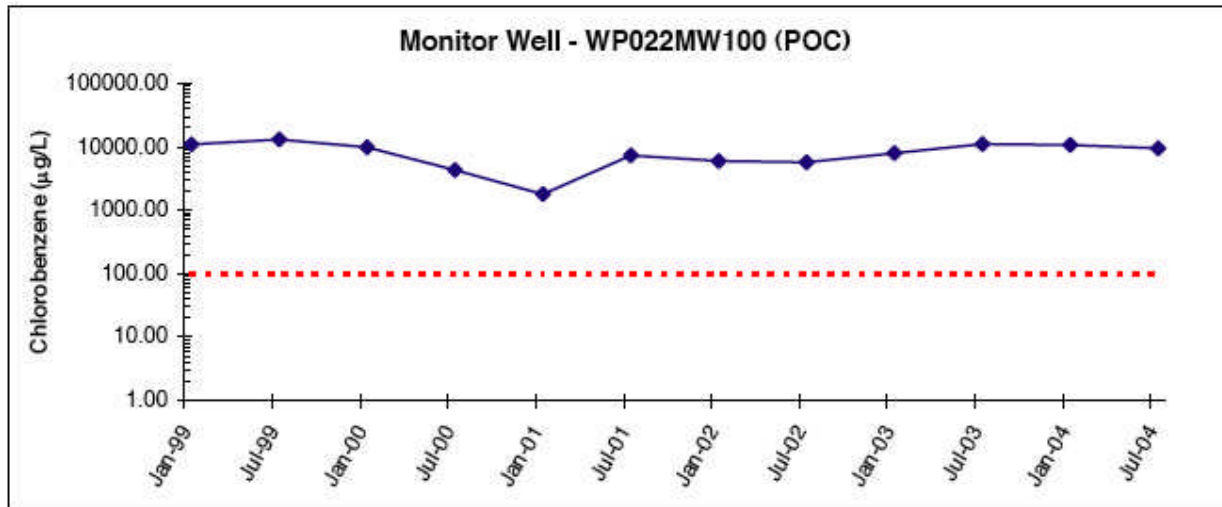
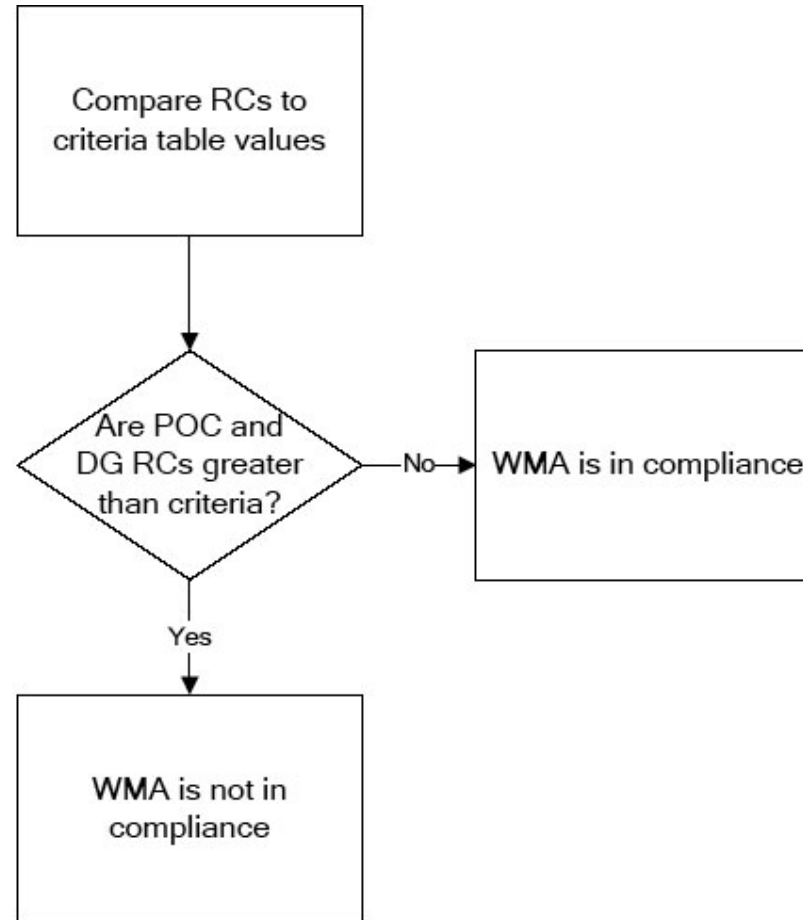


TABLE 5.5
 Historical Minimum and Maximum Concentrations for WMA E-3/SD-1
 Former Kelly AFB, Texas

Well Type	Parameter	GWPS	2000		2001		2002		2003		2004	
			MIN	MAX	MIN	MAX	MIN	MAX	MIN	MAX	MIN	MAX
POC	PCE	5	1U	1U	1U	1U	--	0.12J	1U	20U	1U	20U
POC	TCE	5	1U	1.2=	1U	0.48J	--	0.11J	0.1J	8.05J	1U	20U
POC	DCE	70	1.54=	5.5=	1U	18=	--	0.53J	0.28J	251=	0.49 J	219 =
POC	VC	2	1U	4.2=	1U	22=	--	1U	0.65J	230=	0.84 J	257 =
POC	CB	100	1U	4,300=	1U	7300=	--	1U	58.4=	11,100=	16.9 =	9,510 =
POC	Bz	5	1U	200=	1U	260=	--	1U	2.73=	667=	0.46 J	1,940 =
POC	As	50	1.91U	70=	2.1U	117=	--	1U	8.5J	68.7=	2.95 J	43 =
POC	Cr	100	3.30UJ	3.8U	2U	4.2J	--	4.7J	1U	3.1U	0.959 U	1.63 J
POC	Mn	--	530=	630=	191=	379=	--	813J	665=	1060=	330 =	536 =
POC	Ni	100	22=	85=	29=	47=	--	51=	34.8=	41.4=	10.1 J	24 =

Quality of the Decision



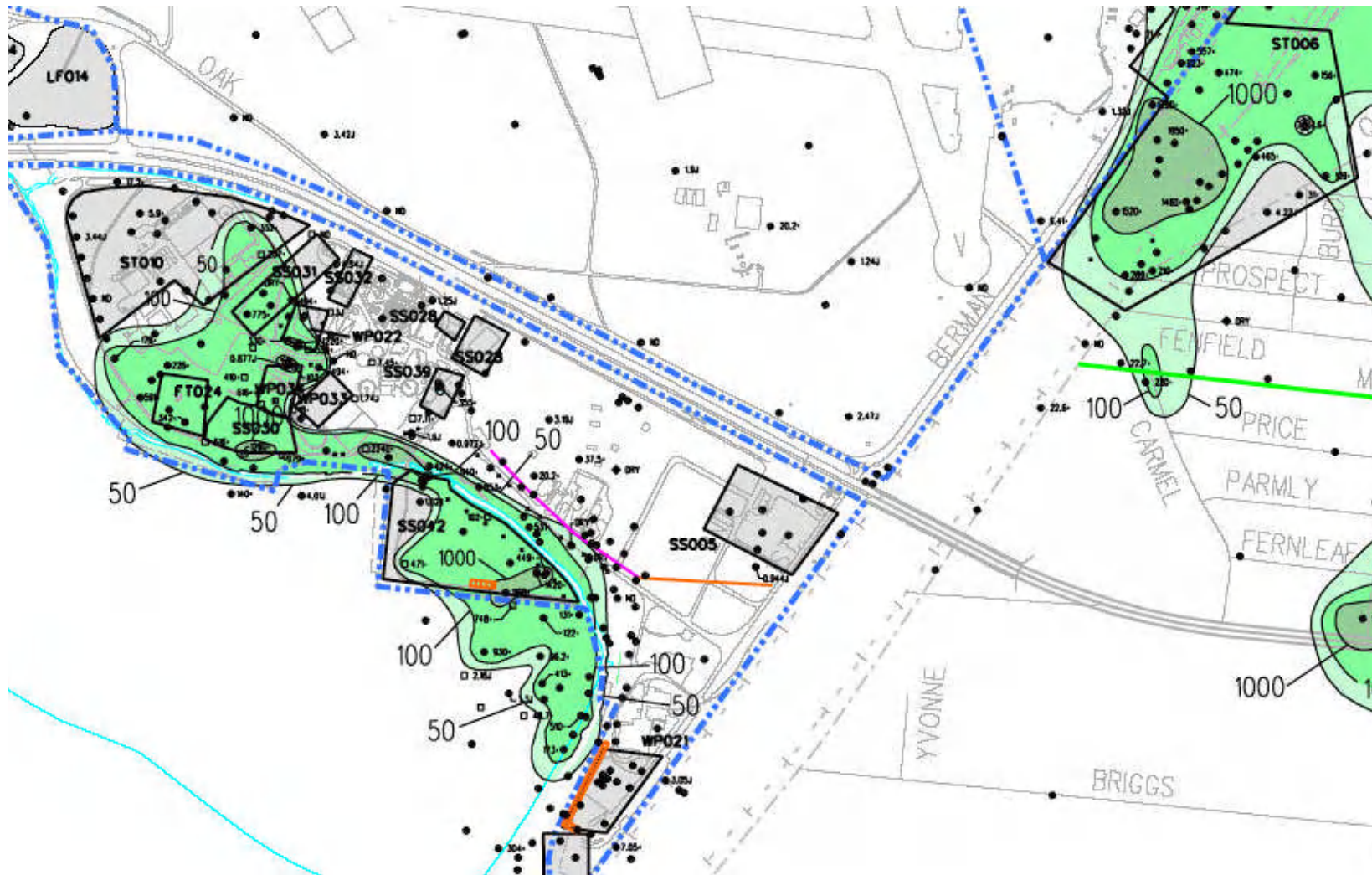
Acronyms

DG	Downgradient
FOND	Frequency of non-detect
POC	Point of compliance
RCs	Representative concentration
WMA	Waste management area

Site E-3/SD-1 Example

- Data reports for only 13 of 24 wells sampled
(compare Table D.3 with Figure M.1)
- No lab reports for sampled POC wells
- Downgradient wells
 - 15 wells shown on site plan - Figure 5.7
 - 7 wells sampled, Figure M.1
 - 2 wells used in compliance determination
- Many of sampled Corrective Action wells unrelated to site

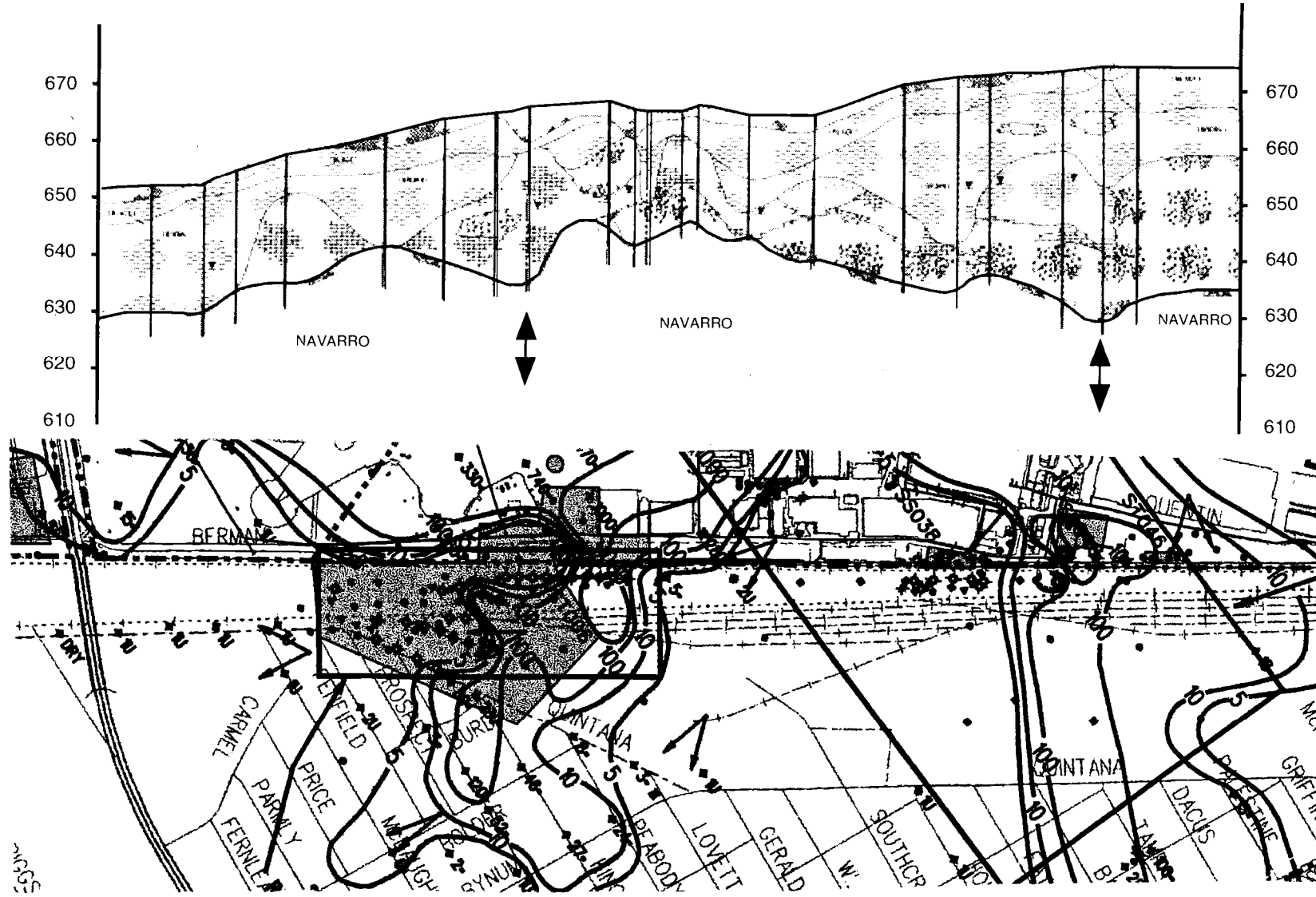
Zone 2 - Manganese Plume



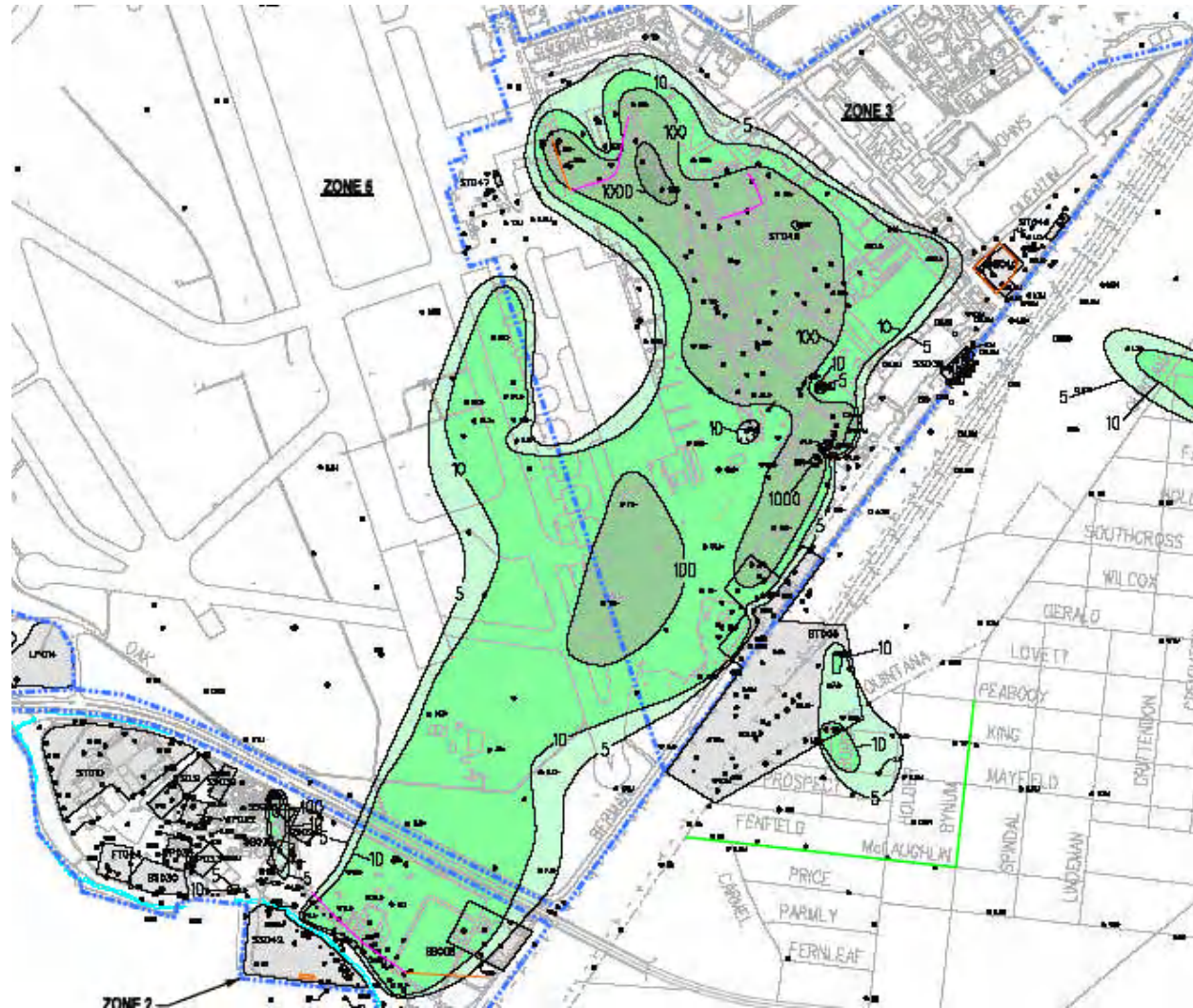
Agent Orange

- No specific sampling for 2,4,5-T and 2,4-D
- No dioxin sampling performed.
- 1,2,4,5-Tetrachlorobenzene in Leon Creek fish

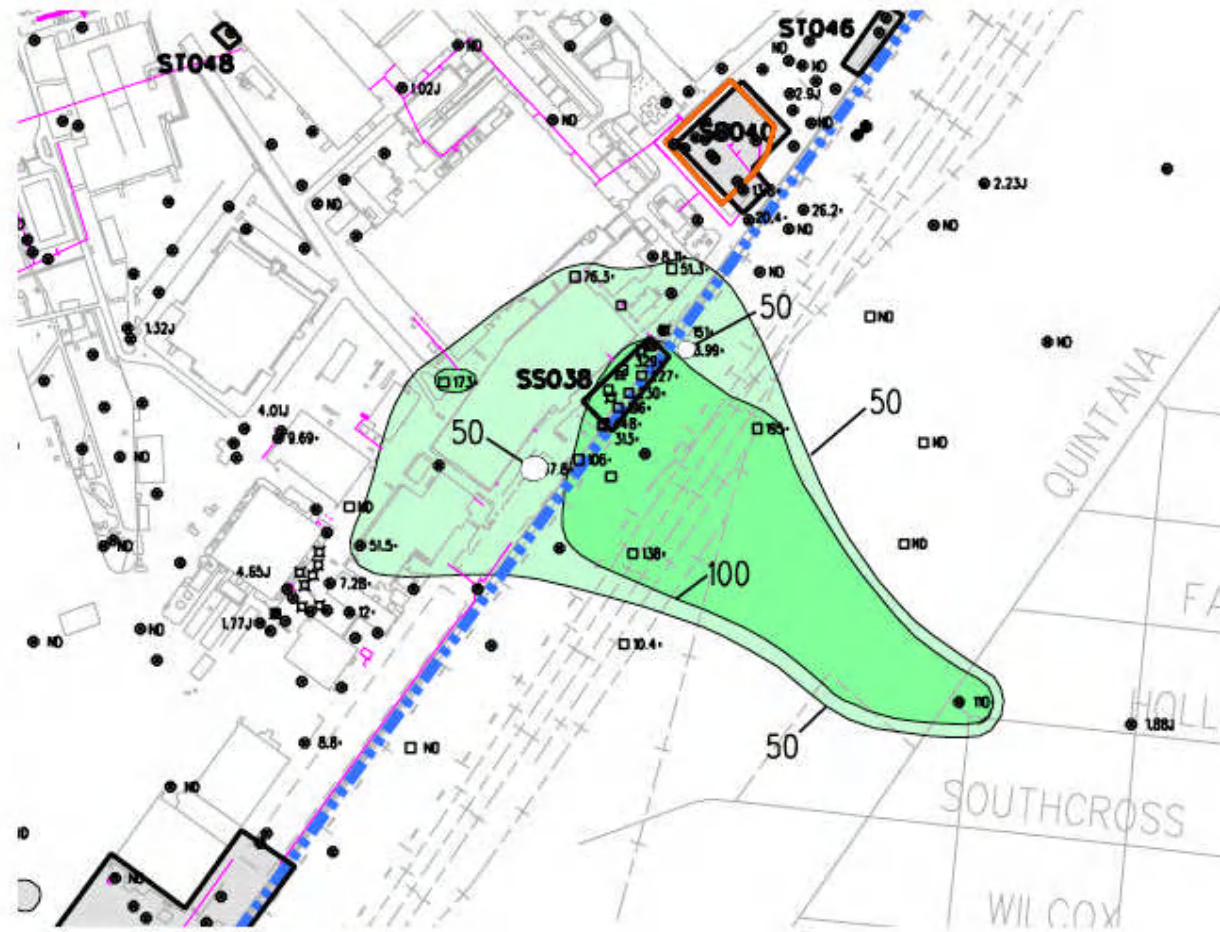
Zone 3 - Groundwater Flow



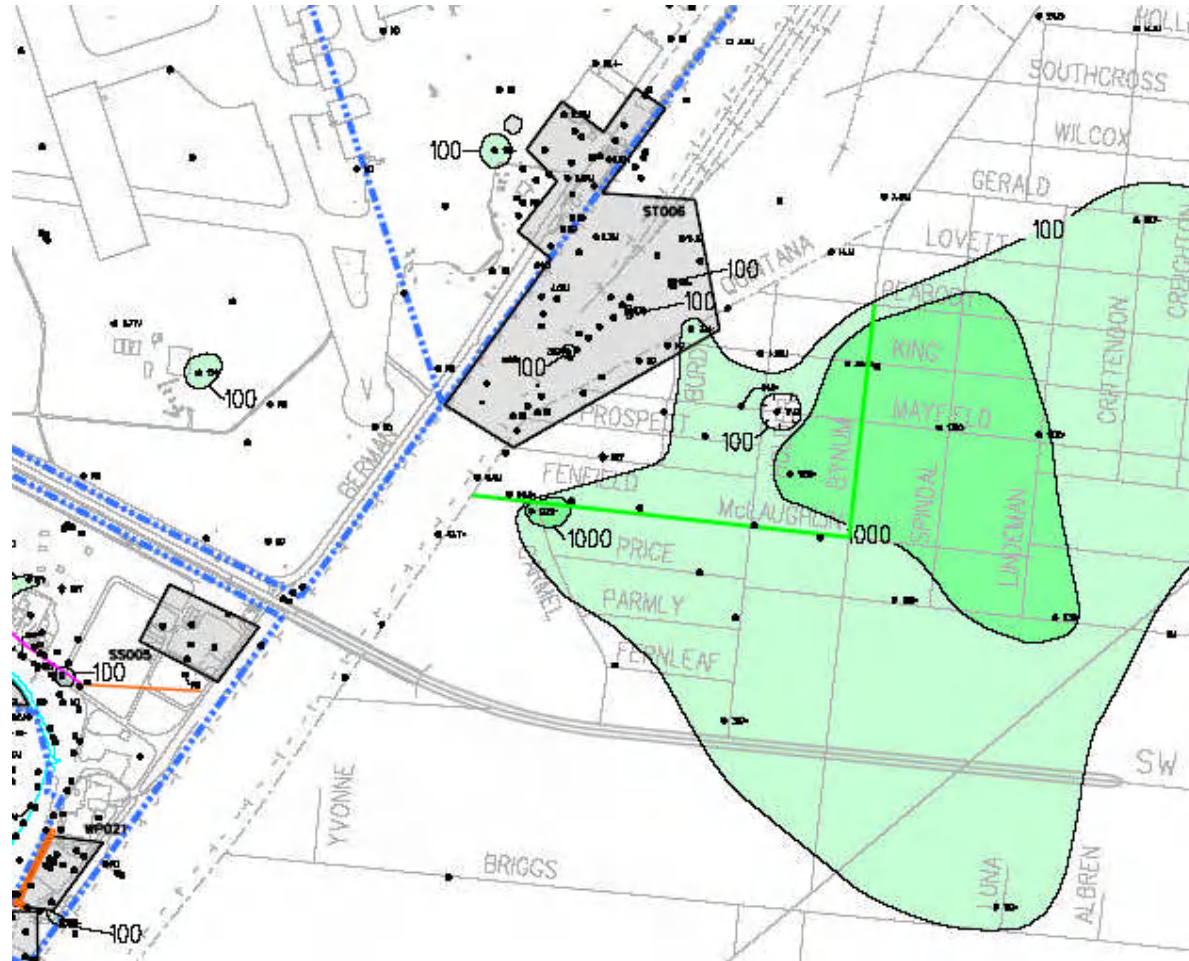
Zone 3 PCE Plume



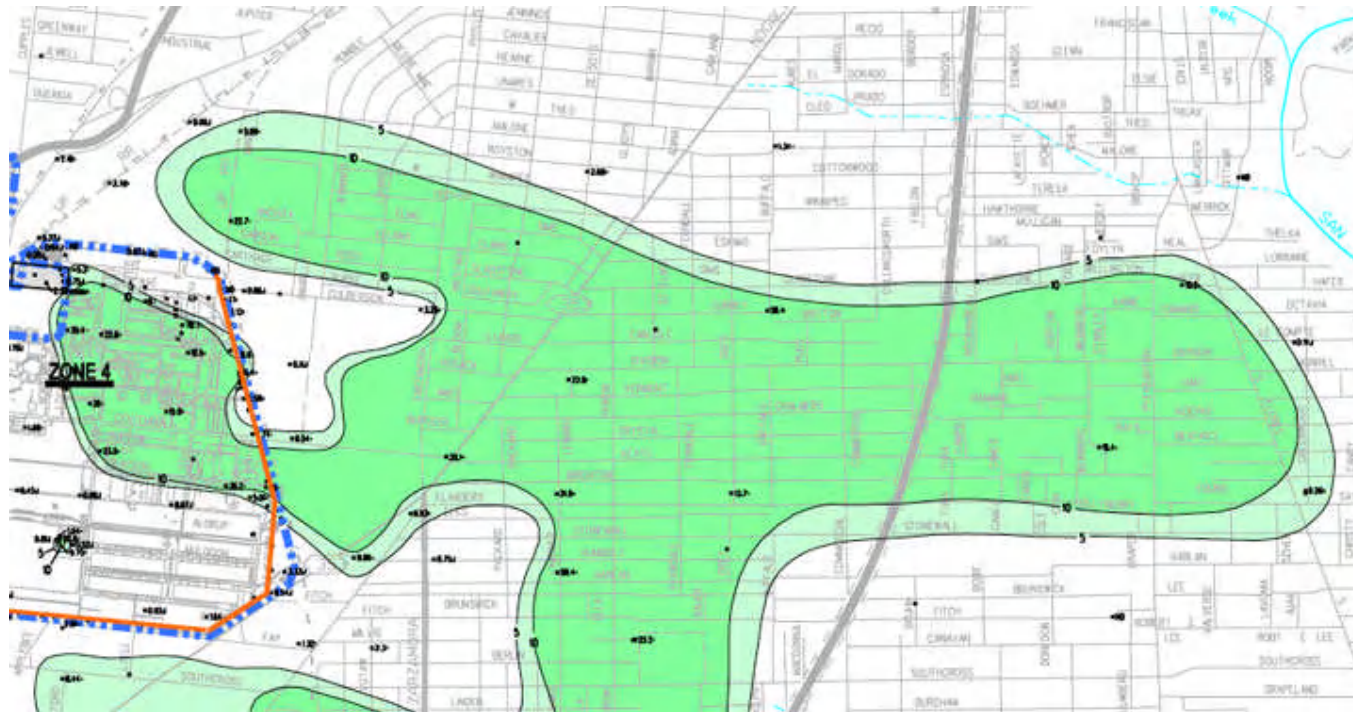
Zone 3 Arsenic Plume



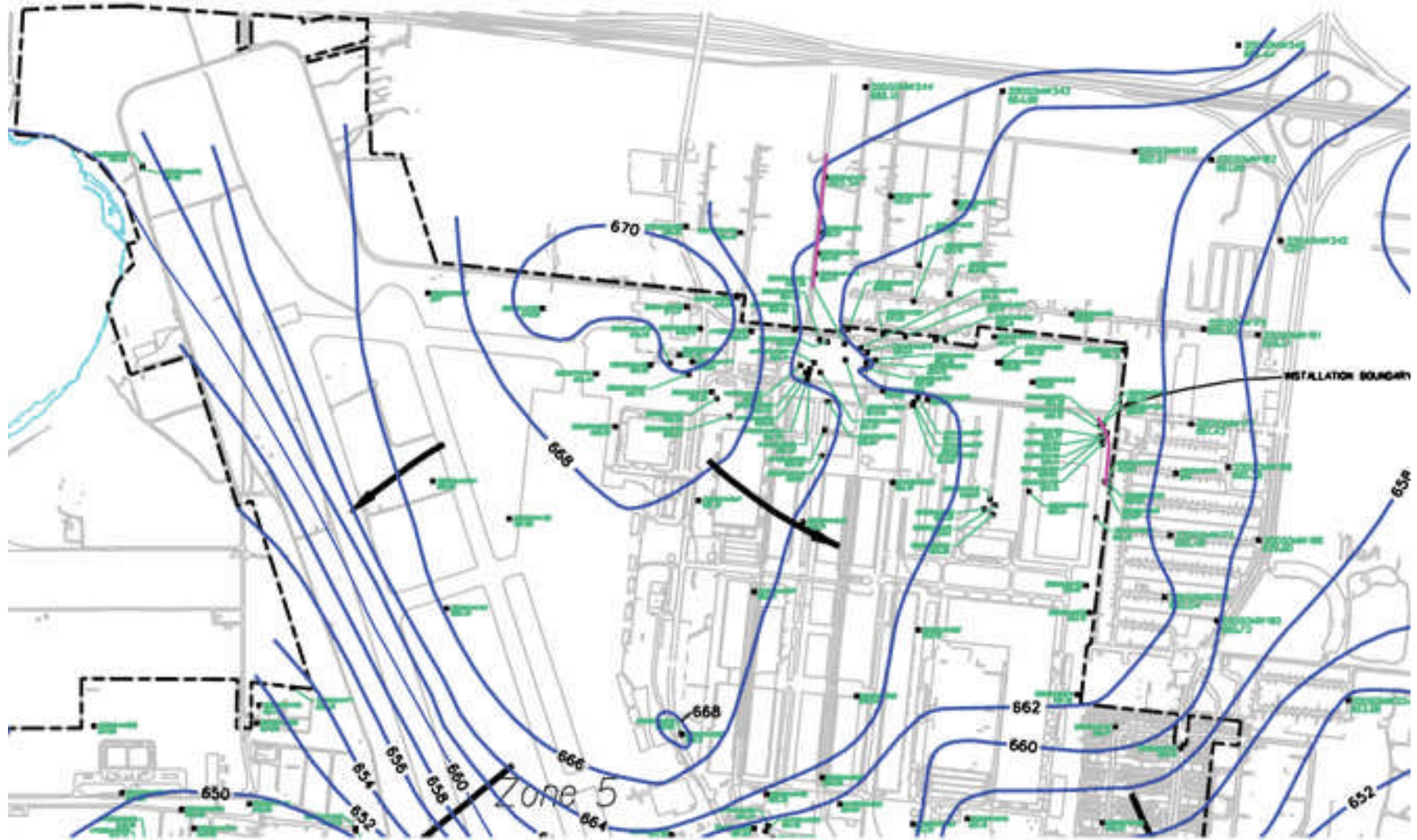
Zone 3 - Nickel Plume



Zone 4 TCE Plume



Groundwater Flow Zone 5



Zone 5 PCE Plume



Conclusions

- Monitor slurry walls and permeable-barrier reactors
- Evaluate data trends and make Compliance Decisions using complete/consistent data
- Reduce impacts of secondary contaminants

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ADMINISTRATIVE RECORD

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