KELLY AFB
TEXAS

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 3230

Kelly Restoration Advisory Board (RAB)
Meeting Agenda
January 18, 2005, 6:30 – 9:30 p.m.*
Kennedy High School
1922 S. General McMullen

Meeting Goals
The RAB will:

- Appoint new members to the RAB in order to create a group that reflects the diversified interests of the community
- Advise and comment on former Kelly Air Force Base environmental matters/documents
- Receive updates on environmental remediation projects

I.	Roll call begins at 6:30 p.m. - Meeting will convene - Pledge of Allegiance - Moment of silence - Discuss goals for this meeting - Review supplemental packages - Approve October and November RAB meeting transcripts and summaries	Dr. David Smith
II.	Community Comment Period	Dr. David Smith
III.	Explanation of voting process	Dr. David Smith
IV.	Candidate oral presentations - Persons running for appointment or their alternate must be present and will have three minutes to speak	Candidates
V.	Voting by ballot for new Board members	RAB Voting Members
	A. Candidates from the locally affiliated area	
	B. All other candidates	
VI.	Voting results and appointment of new members	Dr. David Smith
VII.	Community Co-chair candidate oral presentations	Candidates
VIII.	Voting by ballot for new Community Co-chair	RAB Voting Members
IX.	Voting results and election of new Community Co-chair	Dr. David Smith
X.	Ten Minute Break	
XI.	A. Final Technical Assistance for Public Participation (TAPP) Review of the Zone 2/3 Corrective Measures Study	Mr. Jeff Neathery
	B. Air Force Response to the TAPP Review	Ms. Norma Landez/ Mr. Don Buelter
	C. Question & Answer Session/Community Comment on the TAPP Review	Dr. David Smith
XII.	RAB Planning Period	Mr. Robert Silvas
XIII.	Kelly Current Events Update - Outreach activities - Media coverage/news clips/public notices - Requests for information - Documents to RAB - Kelly Health Information Officer update - Environmental update/Spill Summary report - BRAC Cleanup Team (BCT) update - Redevelopment update (GKDA)	Ms. Sonja Coderre
XIV.	Community Comment Period	Dr. David Smith
XV.	Meeting wrap-up - Address action items from previous meeting - Vote on action items from current meeting - Next TRS meeting proposed for Tuesday, February 8, 2005, at Brentwood Middle School at 6:30 p.m.** - Next RAB meeting proposed for Tuesday, April 20, 2005, at Brentwood Middle School at 6:30 p.m.** - RAB member workshop will be held in February. Notice will be sent as soon as the date and time have been confirmed.	Dr. David Smith

**Meeting ends due to facility availability*
***Meeting dates and locations are subject to change*

January 18, 2005
Kelly Restoration Advisory Board
Special Restoration Advisory Board (RAB) Meeting
Kennedy High School Auditorium
1922 S. General McMullen
San Antonio, TX 78226

~~Draft~~ Meeting Minutes

RAB Community Member Attendees:
Mr. Mike Denuccio
Ms. Esmeralda Galvan
Mr. Rodrigo Garcia, Jr
Mr. Dan Gonzales
Mr. Pete Muzquiz
Mr. Sam Murrah
Mr. Nazarite Perez
Mr. Paul Person
Mr. Armando Quintanilla, Alternate for Mr. George Rice
Mr. Michael Sheneman
Mr. Robert Silvas
Ms. Carol Vaquera

RAB Government Member Attendees:
Mr. William Ryan, Government Co-Chair, Alternate for Mr. Adam Antwine
Ms. Kyle Cunningham, San Antonio Metropolitan Health District (SAMHD)
Mr. Gary Martin, Greater Kelly Development Authority (GKDA)
Mr. Gary Miller, Environmental Protection Agency (EPA) Region VI
Mr. Mark Weegar, Texas Commission on Environmental Quality (TCEQ)

Other Attendees:
Ms. Rita Boland, Air Force Real Property Agency (AFRPA) Contractor
Mr. Don Buelter, AFRPA
Ms. Sonja Coderre, AFRPA
Ms. Mary Dunagan, Community Member
Ms. Leigh-Ann Fabianke, AFRPA Contractor
Ms. Coriene Hannapel, Community Member
Ms. Blanca V. Hernandez, Community Member
Ms. LeAnn Herren, AFRPA Contractor
Ms. Linda Kaufman, Environmental Health and Wellness Center
Ms. Cheri Kirkpatrick, AFRPA Contractor
Ms. Henrietta LaGrange, Community Member
Ms. Norma Landez. AFRPA
Mr. Ruben Martinez, Community Member
Mr. Jeff Neathery, Community Member
Mr. David Plylar, Community Member

Ms. Abbi Power, TCEQ
Ms. Melanie Ritsema, SAMHD
Mr. Kelley Siwecki, AFRPA Contractor
Mr. Brendan Smith, Community Member
Dr. David Smith, Facilitator
Ms. Tonya Spurlin, Community Member
Mr. Tim Sueltenfuss, AFRPA Contractor
Ms. Robyn Thompson, AFRPA Contractor
Mr. Glenn Wilkinson, Community Member

The meeting began at 6:27 p.m.

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

Dr. David Smith informed the RAB that due to the expiration of terms, there was no Community Co-chair. As parliamentarian, Mr. Mike DeNuccio would act as Community Co-chair for this meeting.

II. Administrative – Dr. David Smith
A. Approval of October and November RAB meeting transcripts and summaries.

Mr. Peter Muzquiz moved for the approval of the October and November RAB meeting transcripts and summaries. A community member seconded. The motion was voted on by the RAB. Motion carried.

III. Community Comment Period – Dr. David Smith
Mr. Robert Silvas provided a comment.

Mr. Glenn Wilkinson provided a comment.

IV. Appointment Process – Mr. Timothy Sueltenfuss
Mr. Tim Sueltenfuss presented a briefing on how the appointment process for the RAB elections would proceed.

V. Candidates Oral Presentations
Ms. Henrietta LaGrange gave a presentation.

Mr. Paul Person gave a presentation.

Mr. Rodrigo Garcia, Jr. gave a presentation.

Mr. Dan Gonzales gave a presentation.

Ms. Coriene Hannapel gave a presentation.

Mr. Ruben Martinez gave a presentation.

Mr. Sam Murrah gave a presentation.

Mr. Armando Quintanilla gave a presentation.

Mr. Robert Silvas gave a presentation.

Mr. Glenn Wilkinson gave a presentation.

Mr. Michael Sheneman moved that Mr. Armando Quintanilla be able to remain as a voting member. Mr. Pete Muzquiz seconded the motion. The motion was voted on by the RAB. Motion denied.

VI. Voting by Ballot for New Board Members
Local Community Candidates:
Mr. Rodrigo Garcia, Jr. was elected with 6 votes.

Ms. Henrietta LaGrange was elected with 4 votes.

Mr. Paul Person was not elected as a local community candidate.

Other Community Candidates:
Mr. Robert Silvas was elected with 5 votes.

Ms. Coriene Hannapel was elected with 7 votes.

Mr. Dan Gonzales was elected with 6 votes.

Mr. Armando Quintanilla was elected with 5 votes.

Mr. Ruben Martinez was elected with 6 votes.

Mr. Paul Person was not elected.

Mr. Sam Murrah was not elected.

Mr. Glenn Wilkinson was not elected.

VII. Community Co-chair Candidates Oral Presentation
Mr. Robert Silvas gave a presentation.

Mr Dan Gonzales gave a presentation.

VIII. Voting and Election of Community Co-chair

Mr. Michael Sheneman nominated Mr. Robert Silvas for the position of Community Co-chair. Ms. Esmeralda Galvan seconded the nomination.

Mr. Henry Galindo nominated Mr. Daniel Gonzales for the position of Community Co-chair. Ms. Carol Vaquera seconded the nomination.

The nominations were voted on separately.
Mr. Daniel Gonzales received 5 votes. Mr. Robert Silvas received 9 votes and was elected Community Co-chair.

IX. TAPP Review of the Zone 2/3 Corrective Measures Study – Mr. Jeff Neatherly
Mr. Jeff Neatherly of Neathery Environmental Services presented a briefing on the *TAPP Review of the Zone 2/3 Corrective Measures Study*.

X. The Air Force Response to TAPP Review – Mr. Don Buelter
Mr. Don Buelter responded to the comments and recommendations from Mr. Neathery's *Draft TAPP Review of the Zone 2/3 Corrective Measures Study*.

Question and answer session followed regarding the TAPP Review and the Response to the TAPP Review.

XI. RAB Planning Period.
RAB members were provided a calendar of proposed agenda items for upcoming TRS and RAB meetings. The Board was provided a handout regarding proposed dates for the February workshop, RAB community members were asked to select a preferred date for the workshop.

XII. Kelly Current Events Update – Ms. Sonja Coderre
Ms. Sonja Coderre explained each section of the RAB meeting packet.

XIII. Community Comment Period
No comments were made.

XIV. Adjournment
A community member moved for adjournment. A community member seconded the motion. The motion was voted on by the RAB. Motion carried.

The meeting adjourned at 9:29 p.m.

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

R. Silvas 10/11/05
Robert Silvas Date
Community Co-chair

Adam Antwine 10/11/05
Adam Antwine Date
Installation Co-chair

DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

8 February 2005

Ms. Sonja S. Coderre
Public Affairs Officer
143 Billy Mitchell Blvd, Ste 1
San Antonio TX 78226-1816

Dear Restoration Advisory Board (RAB) Member

Thank you for your continued interest in the Kelly environmental cleanup program. For your reference, I have included a summary of the 18 January 2005 RAB meeting.

This summary is a brief overview of what occurred at the RAB meeting. A court reporter prepared a word-by-word transcript of the meeting. In an effort to conserve paper, the transcript will not be handed out at the 19 April RAB meeting. If you would like to request a copy of the transcript, please call (210) 925-0956. If you do not request a transcript, a copy will be available for your review in the following Information Repository:

San Antonio Central Public Library
600 North Soledad, 2nd Floor Government Documents Section
San Antonio TX 78205

I appreciate the opportunity to share information on the Kelly environmental cleanup program with you. If you have any questions, please call (210) 925-0956.

Sincerely

SONJA S. CODERRE

Attachment:
18 January 2005 RAB Meeting Summary

Kelly Special Restoration Advisory Board (RAB)
SUMMARY

January 18, 2005
Kennedy High School Cafeteria
1922 S. General McMullen
San Antonio, TX 78226

1. **Attendees:**

Ms. Rita Boland
Mr. Don Buelter
Ms. Sonja Coderre
Ms. Kyle Cunningham
Mr. Mike Denuccio
Ms. Mary Dunagan
Ms. Leigh-Ann Fabianke
Ms. Esmeralda Galvan
Mr. Rodrigo Garcia, Jr.
Mr. Dan Gonzales
Ms. Coriene Hannapel
Ms. Blanca V. Hernandez
Ms. LeAnn Herren
Ms. Linda Kaufman
Ms. Cheri Kirkpatrick
Ms. Henrietta LaGrange
Ms. Norma Landez
Mr. Gary Martin
Mr. Ruben Martinez
Mr. Gary Miller
Mr. Sam Murrah
Mr. Pete Muzquiz
Mr. Jeff Neathery
Mr. Nazarite Perez
Mr. Paul Person
Mr. David Plylar
Ms. Abbi Power
Mr. Armando Quintanilla
Ms. Melanie Ritsema
Mr. Michael Sheneman
Mr. Robert Silvas
Mr. Kelley Siwecki
Dr. David Smith
Mr. Brendan Smith
Ms. Tonya Spurlin
Mr. Tim Sueltenfuss
Ms. Robyn Thompson
Ms. Carol Vaquera
Mr. Mark Weegar
Mr. Glenn Wilkinson

2. **Introduction.** Dr. David Smith, RAB Facilitator, opened the meeting at 6:40 p.m. The pledge of allegiance was said and a moment of silence was observed. Dr. Smith announced that one goal of the meeting was to advise and comment on former Kelly AFB environmental matters and documents and to receive updates on restoration and environmental remediation projects. Another goal of this meeting was to appoint new members to the RAB in order to create a group that reflects the diversified interests of the community. Dr. Smith then asked for a motion to approve the October and November RAB meeting transcripts and summaries. The summaries and transcripts were approved. Mr. Armando Quintanilla wanted the record to reflect that he did not approve the summaries and believes them to be an inadequate representation of the meetings.

3. **Community Comment Period.** Community members in the audience had three minutes to comment.

4. **Explanation of the Appointment Process.** Mr. Tim Sueltenfuss presented a briefing on how the appointment process for the RAB elections would proceed. He also asked for confirmation from the RAB members that they agreed on the process and were open to following the appointment procedure. There was a motion on the floor that Mr. Quintanilla, who was acting as Mr. George Rice's alternate, would not be able to vote in the elections. The motion was voted on and passed, and Mr. Quintanilla was asked not to participate in the appointment process.

5. **Candidate oral presentations.** All candidates participating in the election had two minutes to introduce themselves to the current RAB members. Candidates spoke in the following order: Mr. Rodrigo Garcia Jr., Ms. Henrietta LaGrange, Mr. Paul Person, Mr. Dan Gonzales, Ms. Coriene Hannapel, Mr. Ruben Martinez, Mr. Sam Murrah, Mr. Quintanilla, Mr. Robert Silvas and Mr. Glenn Wilkinson.

6. **Voting by ballot for new Board members.**
   A. Candidates from the local community. Ballots were passed out to the current RAB members who were participating in the appointment process.
   B. All other candidates. Ballots were passed out to the current RAB members who were participating in the appointment process.

7. **Voting results and election of new members.** The votes were tallied and the new RAB members were announced and invited to take their seats at the table with the rest of the RAB members. Mr. Garcia and Ms. LaGrange were elected to the RAB as local candidates. The following candidates were elected to the remaining spots on the RAB: Mr. Gonzales, Ms. Hannapel, Mr. Martinez, Mr. Quintanilla and Mr. Silvas.

8. **Community Co-chair nominations.** Mr. Silvas and Mr. Gonzales were both nominated for the Community Co-chair position.

9. **Voting, results and election of new Community Co-chair.** A "show of hands" vote was taken by RAB members to choose the Community Co-chair. As a result, Mr. Silvas was elected to become the new Community Co-chair by a majority of the RAB members.

10. **Ten minute break.**

11. **A. Final *Technical Assistance for Public Participation (TAPP) Review of the Zone 2/3 Corrective Measures Study*.** Mr. Jeff Neathery, from Neathery Environmental Services, presented a briefing on the *TAPP Review of the Zone 2/3 CMS*, including an overview of the report, comments on the report and recommendations to improve the report.

    B. Air Force Response to the Draft TAPP Review. Mr. Don Buelter responded to the comments and recommendations from Mr. Neathery's *Draft TAPP Review of the Zone 2/3 CMS*.

C. Question & Answer Session on the TAPP Review. Mr. Neathery, Mr. Buelter and Ms. Norma Landez responded to questions from the audience and RAB members in attendance concerning the TAPP Review and related subjects.

12. **RAB Planning Period.** RAB members were given a calendar of proposed agenda items for upcoming TRS and RAB meetings. The Board was given a handout and asked to select a date for the February workshop.

13. **Kelly Current Events Update.** Ms. Sonja Coderre explained each section of the RAB meeting packet.

14. **Community Comment Period.** Community members in the audience had three minutes to comment.

15. **Meeting Wrap-Up.** Dr. Smith stated that there were no action items to review from the previous RAB meeting. There were no specific action items from this RAB meeting. Dr. Smith then asked for a motion of adjournment and the RAB so motioned.

16. **Next Meeting.** The next TRS meeting is set for Tuesday, February 8, 2005, at 6:30 p.m., at the Environmental Health and Wellness Center. The RAB Workshop is set for Saturday, February 19, 2005 from 8:00 a.m. to 3:00 p.m. at the Greater Kelly Development Authority. The next RAB meeting is set for Tuesday, April 20, 2005, at 6:30 p.m., at Brentwood Middle School.

17. **Adjourn.** 9:29 p.m.

RAB RECRUITMENT

Goal:

To recruit community members for the January 18, 2005, Kelly RAB community member elections. RAB members have an interest and knowledge of the cleanup and restoration events at Kelly and a desire to work in the cooperative spirit to further efforts in a positive manner

Strategies:

- Use mail, group, and one-on-one contact to spread the message about Kelly and inspire interest in the community
- Use this interest to recruit members for the upcoming elections

Audience:

- Community members who live in the immediate area surrounding Kelly or who have ever worked at Kelly
- Anyone in San Antonio and the surrounding area who has an interest in the environmental and restoration efforts at Kelly

Actions:

- Developed RAB application materials in English and Spanish
- Mailed RAB recruitment packages to an initial list in October 2004
- Called community members involved in local efforts and sent out personalized packets
- Made numerous follow-up calls to people who received RAB recruitment packages
- Mailed out recruitment packages to people who called the public information line and requested them
- Placed an ad in the *San Antonio Business Journal*, *Southside Reporter*, *Lackland Talespinner*, *Kelly Observer*, and *San Antonio Express-News* Neighbors section (All ads ran at least two times)
- Provided RAB application packets at all Speakers' Bureau events and tours
- Posted RAB information fliers on mailboxes in Billy Mitchell Village

- Contacted local schools, businesses, and Greater Kelly Development Authority; obtained permission to run ads in their newsletters (Edgewood, Lockheed-Martin)

- Mailed out RAB application packets in November to everyone on the Kelly newsletter mailing list (more than 400 people)

- Contacted Congressman-elect Henry Cuellar's office to inform them of our recruitment efforts; faxed an application packet to Cuellar's Chief of Staff

- Provided recruitment materials at all RAB and TRS meetings

- Informed people in person and via telephone of January elections to solicit applications and names of people who might be interested in serving on the RAB

- Called people who have expressed an interest in participating on the RAB; sent out applications to interested parties

- Asked RAB members to inform community members and other interested parties of the elections

- Sent application packets to the Southwest Workers' Union

Results:

- As of December 2, we have received four applications (two of the four are current RAB members)

Future Plans:

- Continue to reach out to the community through mailings and newspaper advertisements

- Use word of mouth to enhance recruitment efforts

- Encourage RAB members to solicit applicants from the community they represent

RAB Elections

I. RAB Members with continuing membership through Jan 2006:

- Ms. Sandra Converse – locally affiliated
- Mr. Mike DeNuccio – locally affiliated
- Mr. Henry Gallindo – locally affiliated
- Ms. Esmeralda Galvan – not locally affiliated
- Mr. Peter Muzquiz – locally affiliated
- Ms. Nazarite Perez – locally affiliated
- Mr. George Rice – not locally affiliated
- Mr. Michael Sheneman – not locally affiliated
- Ms. Carol Vaquera – locally affiliated

II. Seven open positions available:

RAB Members up for re-election:

- Mr. Rodrigo Garcia – locally affiliated (pending application/notification)
- Mr. Paul Person – locally affiliated (pending application/notification)
- Mr. Daniel Gonzales – not locally affiliated (pending application/notification)
- Mr. Sam Murrah – not locally affiliated (pending application/notification)
- Mr. Robert Silvas – not locally affiliated (application received)

Six additional RAB applications received:

- Ms. Henrietta LaGrange – locally affiliated
- Ms. Tanya Sarah Spurlin – locally affiliated
- Mr. Ruben Martinez – not locally affiliated
- Mr. Glenn Wilkinson – not locally affiliated
- Mr. George Vallejo – not locally affiliated
- Mr. Armando Quintanilla – not locally affiliated

IV. Election process

1. Locally affiliated candidates will be voted upon
2. Non-locally affiliated candidates and remaining locally affiliated candidates will be voted upon

Kelly Restoration Advisory Board (RAB)

January 18, 2005

Kennedy High School

Kelly Restoration Advisory Board (RAB)
Meeting Agenda
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1922 S. General McMullen

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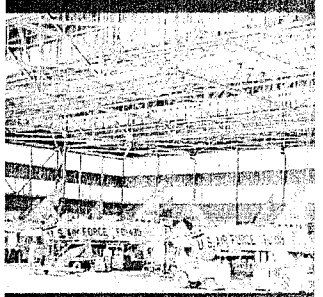
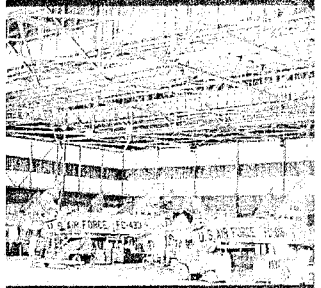


Air Force
Real Property
Agency/
Division
Central →
Kelly

Environmental
Site Cleanup

Explanation of the Appointment Process

Restoration Advisory Board
January 18, 2005



Air Force Real Property Agency/ Division: Central — Kelly

Environmental Site Cleanup

Background

The composition of the RAB is determined by the charter:

- 25 members total
  - 9 government positions
    -- Appointed by the Installation Co-chair
  - 16 community members
    -- At least 8 members from the local community

Air Force Real Property Agency/ Division, Central – Kelly

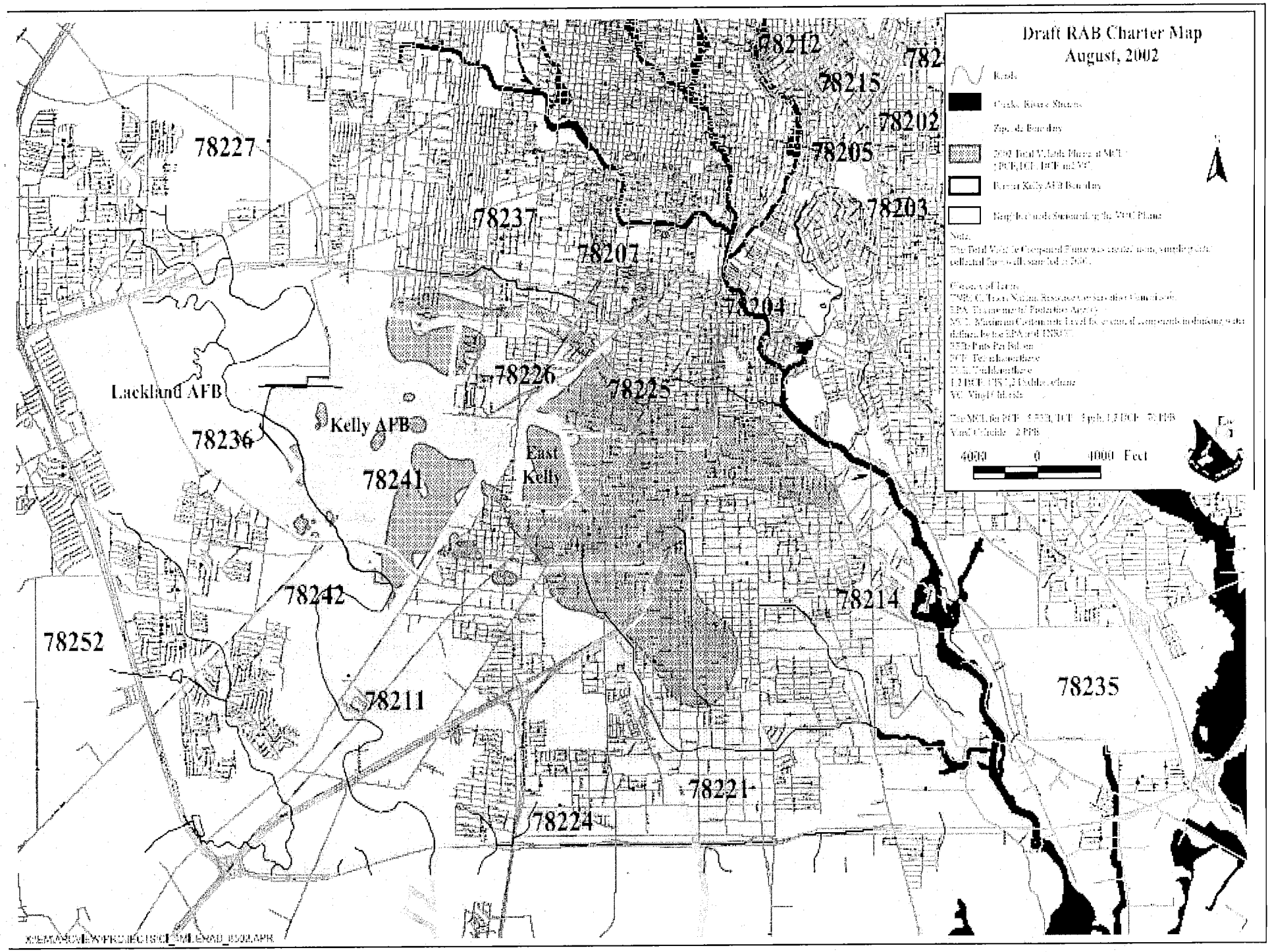
Environmental Site Cleanup

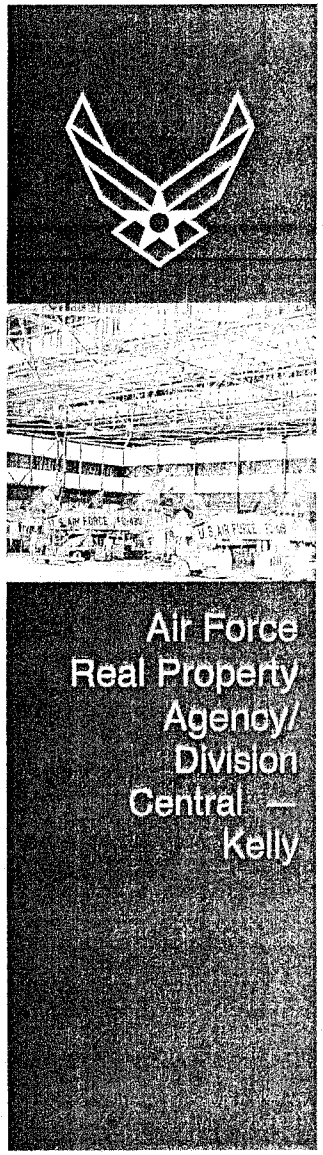
Background

Composition.

Addendum to the Kelly AFB RAB Charter : "A minimum of eight of the sixteen community positions shall currently reside, own property, or be employed within the neighborhoods surrounding the plume, as indicated in Appendix A to this addendum."

- The RAB adopted this provision after conducting ten Charter Review Subcommittee meetings in 2002
- To qualify as a local area community member, you must currently live, work, or own property in this area



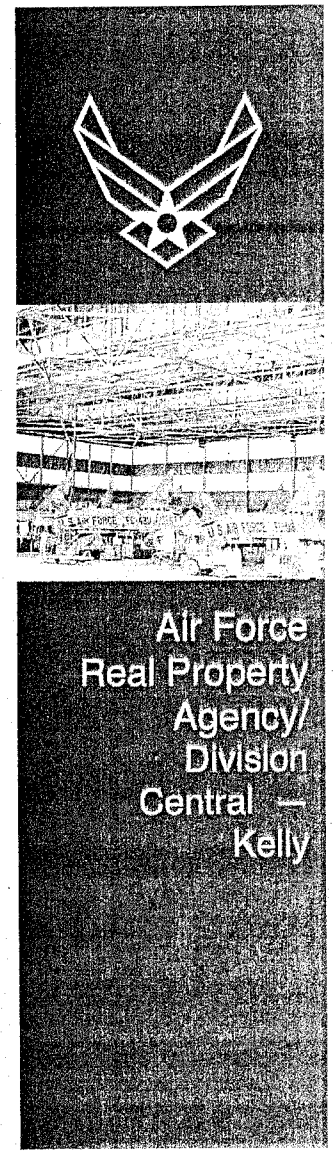


Environmental
Site Cleanup

Background

The candidates will introduce themselves

- Local community candidates first, all other candidates next
- Each person will have two minutes to introduce him or herself



Environmental
Site Cleanup

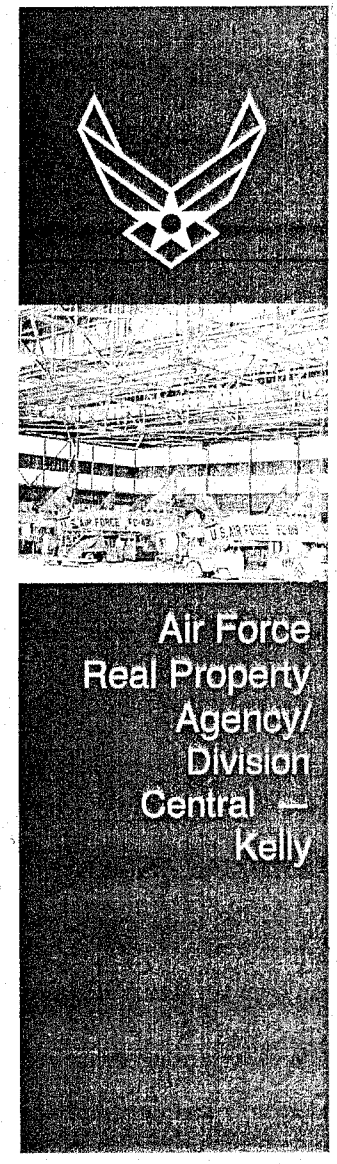
Local Community

The two required local community member positions will be filled first

- We will ask:
  "Do you want [Candidate's Name] to represent the local community on the RAB?"

Appointment of community positions (64% of available RAB positions).

Addendum to the Kelly AFB RAB Charter : "The RAB will first appoint members from the "affected community" to comply with the proportionate representation indicated above…After the required proportion of community RAB member representation is achieved, balloting shall proceed to fill the remaining community member vacancies on the RAB."



Environmental
Site Cleanup

Ballots

Local Candidates

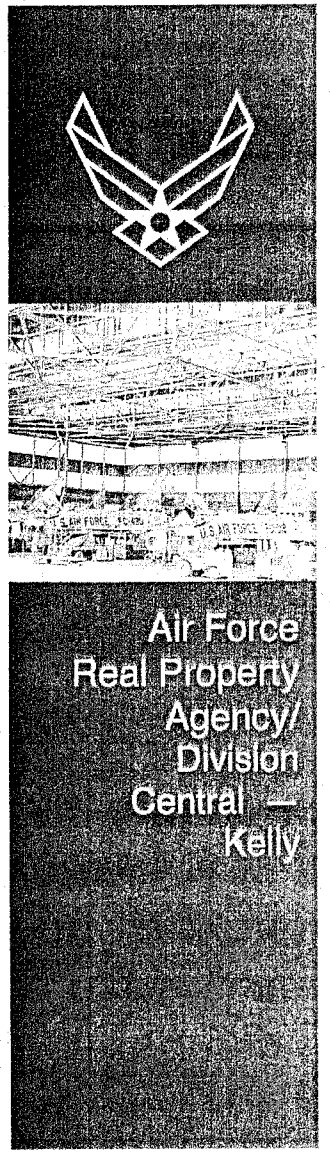
Please mark YES or NO for each candidate.
An empty block counts as a "NO" vote.

Do you want **Rodrigo Garcia**
to represent the local community on the RAB? YES NO

Do you want **Henrietta LaGrange**
to represent the local community on the RAB? YES NO

Do you want **Paul Person**
to represent the local community on the RAB? YES NO

Do you want **Tanya Sarah Spurlin**
to represent the local community on the RAB? YES NO



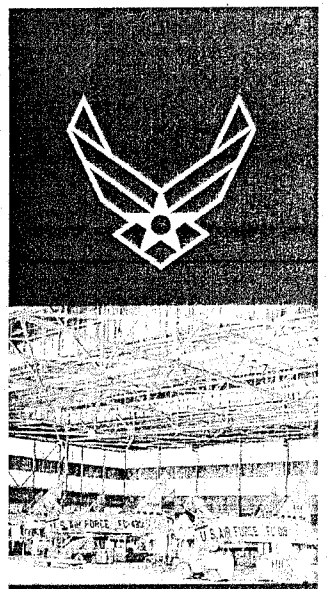
Environmental
Site Cleanup

Local Community

The candidate must receive a majority of votes from voting members present to be elected

Appointment of community positions (64% of available RAB positions).

Addendum to the Kelly AFB RAB Charter : "Applicants for community board membership must be appointed by a majority of those community Board members in attendance whose terms are still active."



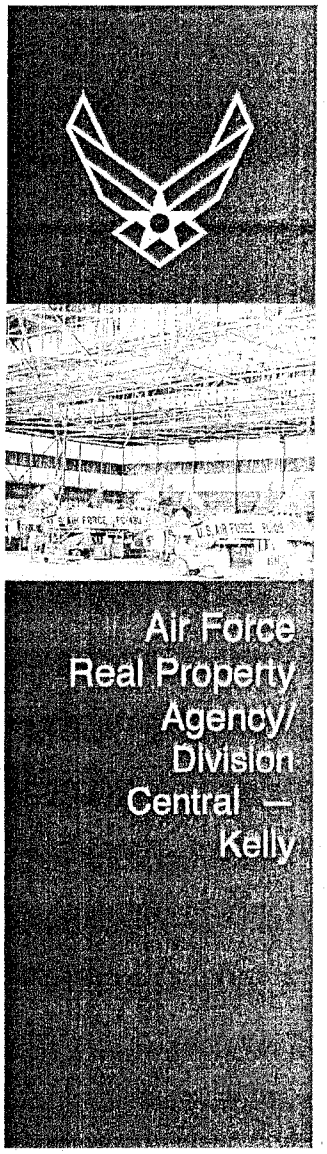
Air Force Real Property Agency/ Division Central – Kelly

Environmental Site Cleanup

Term of office

Terms.

Addendum to the Kelly AFB RAB Charter : "The term of office for a community Board position is two years, commencing upon appointment and ending on December 31 of the following year. After serving all or part of a two-year term, a member may continue to serve additional two-year terms by complying with the provisions of "Applications" and "Appointment of Community Positions" above."



Environmental
Site Cleanup

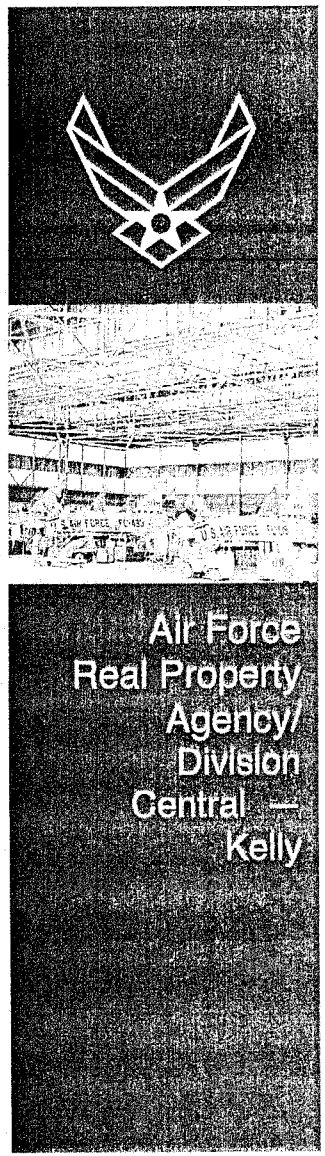
Voters

RAB Members with continuing membership through January 2006

Voters:

Sandra Converse –	local community
Mike DeNuccio –	local community
Henry Galindo –	local community
Esmeralda Galvan –	non-local community
Peter Muzquiz –	local community
Nazirite Perez –	local community
George Rice –	non-local community
Michael Sheneman –	non-local community
Carol Vaquera –	local community

There are **nine** active members voting in tonight's election, so if they are all present, a candidate must receive at least **five** votes to be elected to the RAB.



Environmental
Site Cleanup

Local Community

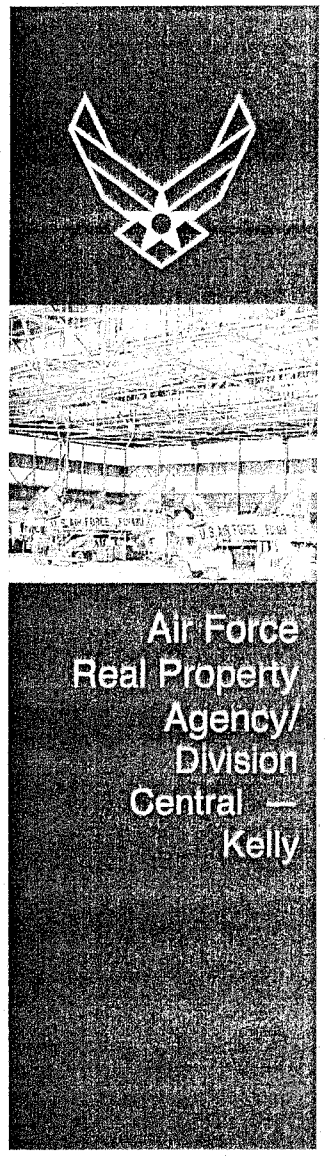
Staff will:

- Pick up ballots
- Read off results
- Tally results
- Announce if any applicant has been selected for membership on the RAB

Multiple rounds of voting may be needed to fill the two local community positions

Appointment of community positions (64% of available RAB positions).

Addendum to the Kelly AFB RAB Charter : "Repeated balloting may be necessary to obtain the required proportion of community RAB member representation identified above."

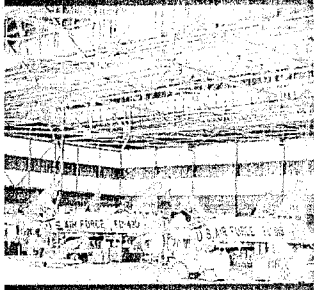


Environmental
Site Cleanup

Other Candidates

The five remaining open positions will be voted on:

- Applicants from the local community who were not selected for a local community position may seek appointment for the remaining positions
- We will ask:
  "Do you want [Candidate's Name] on the RAB?"



Air Force Real Property Agency/ Division Central — Kelly

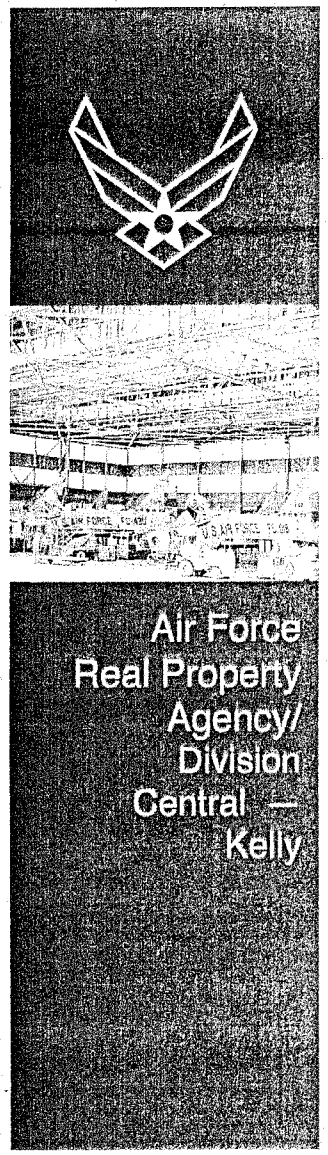
Environmental Site Cleanup

Ballots

All Candidates

Please mark YES or NO for each candidate.
An empty block counts as a "NO" vote.

Do you want **Rodrigo Garcia** on the RAB?	YES	NO
Do you want **Daniel Gonzales** on the RAB?	YES	NO
Do you want **Coriene Hannapel** on the RAB?	YES	NO
Do you want **Henrietta LaGrange** on the RAB?	YES	NO
Do you want **Ruben Martinez** on the RAB?	YES	NO
Do you want **Sam Murrah** on the RAB?	YES	NO
Do you want **Paul Person** on the RAB?	YES	NO
Do you want **Armando Quintanilla** on the RAB?	YES	NO
Do you want **Robert Silvas** on the RAB?	YES	NO
Do you want **Tanya Sarah Spurlin** on the RAB?	YES	NO
Do you want **George Vallejo** on the RAB?	YES	NO
Do you want **Glenn Wilkinson** on the RAB?	YES	NO



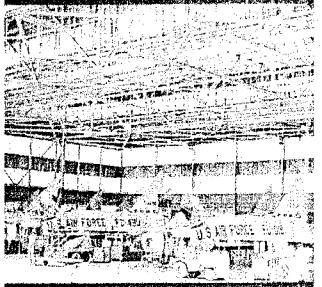
Environmental
Site Cleanup

Other Candidates

The candidate must receive a majority of votes from voting members present to be elected

Appointment of community positions (64% of available RAB positions).

Addendum to the Kelly AFB RAB Charter : "Applicants for community board membership must be appointed by a majority of those community Board members in attendance whose terms are still active."



Air Force Real Property Agency/ Division Central — Kelly

Environmental Site Cleanup

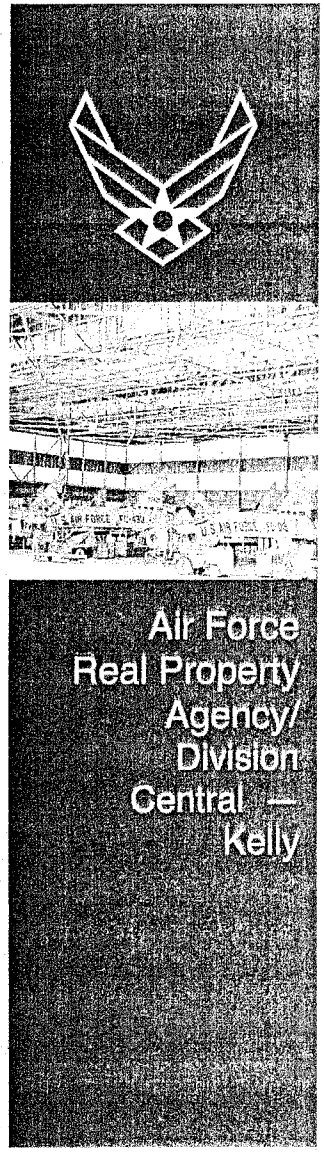
Ballots

RAB Members with continuing membership through January 2006

Voters:

Sandra Converse –	local community
Mike DeNuccio –	local community
Henry Galindo –	local community
Esmeralda Galvan –	non-local community
Peter Muzquiz –	local community
Nazirite Perez –	local community
George Rice –	non-local community
Michael Sheneman –	non-local community
Carol Vaquera –	local community

There are **nine** active members voting in tonight's election, so if they are all present, a candidate must receive at least **five** votes to be elected to the RAB.

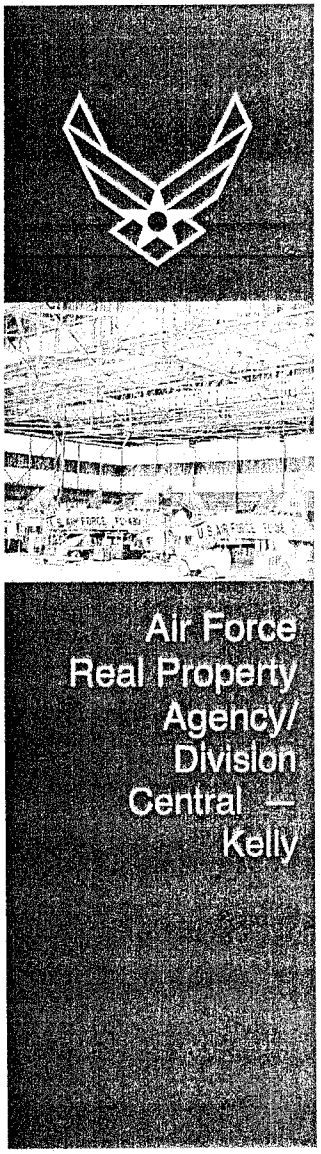


Environmental
Site Cleanup

Other Candidates

Staff will:

- Pick up ballots
- Read off results
- Tally results
- Announce if any applicant has been selected for membership on the RAB



Environmental
Site Cleanup

Other Candidates

If any positions remain open, the RAB may decide to conduct additional rounds of voting or to leave the positions vacant.

Review of the Draft Final
Corrective Measures Study
Zones 2 and 3
Former Kelly Air Force Base

Executive Summary

Neathery Environmental Services was contracted by the AFBCA/DK to conduct a review of the above-referenced document in accordance with the Technical Assistance for Public Participation (TAPP) contract F41622-98-A-5884-call order 0301.

The report was prepared by Science Applications International Corporation (SAIC) as part of their contract F41624-00-D-8030 delivery order 0049. The report states SAIC prepared the study "to evaluate and recommend soil and groundwater final remediation alternatives for zones 2 and 3 sites determined to have chemicals of concern that exceed the Risk Reduction Standard No. 2 criteria."

The report is assesses Media Cleanup Standards, Current Conditions and Conceptual Site Model, Source Alternatives, Groundwater Alternatives and provides a Selection of the Preferred Corrective Measures Alternatives.

The alternatives are evaluated with respect to Overall Protection of Human Health and the Environment, Attainment of Media Cleanup Standards, Control Source of Releases, Comply with Applicable Standards for Management of Wastes, Long-term Reliability and Effectiveness, Reduction of Toxicity, Mobility, or Volume, Short-Term Effectiveness, Implementability and Cost. A Comparative Analyses of Alternatives is also provided.

Fourteen source areas were evaluated with respect to the Risk Reduction No. 2 criteria. It was determined that eight areas exceed Risk Reduction Standard No. 2 criteria. They are Site E-1, Building 522, Building 301, Building 360 Northwest Corner Source Area, Building 360 Basement Source Area, Building 258, Building 348 OWS and Calibration Fuel Spill, and Building 324. In addition alternatives were evaluated for groundwater contamination in Zone 2 and 3.

Alternatives were recommended for each of the eight source areas.

Based upon our review of the documents provided, we conclude the following:

- The report was written clearly and was easily understood. There were no distractions caused by typographic errors or other production problems.
- The report was well organized and presented in a format that is east to follow.
- There are several technical issues that need revision or clarification.
- The recommended alternatives for some of the areas do not seem to correspond with the apparent best alternatives as presented in the tables.

Based upon our findings, we recommend the following:

- Revise or clarify the technical issues listed in this report.

- The recommended alternatives need to be re-evaluated or perhaps better explanations should be provided.

Introduction

Neathery Environmental Services was contracted by the AFBCA/DK to conduct a review of the Corrective Measures Study, Zones 2 and 3, Former Kelly Air Force Base in accordance with the Technical Assistance for Public Participation (TAPP) contract F41622-98-A-5884-call order 0301.

The report was prepared by Science Applications International Corporation (SAIC) as part of their contract F41624-00-D-8030 delivery order 0049.

The report was reviewed by Jeffrey S. Neathery, P.G., C.P.G.(Neathery Environmental Services) and Dr. Christopher C. Mathewson, P.E., P.G. (Texas A&M University)

Purpose and Objective of Report

As stated in the Executive Summary that the report "was prepared in accordance with United States Environmental Protection Agency (USEPA) Resource Conservation and Recovery Act (RCRA) Corrective Action Plan guidance as required by the following:

- the Texas Commission on Environmental Quality (TCEQ, formerly Texas Natural Resource Conservation Commission) – issued Compliance Plan No. 50310 dated 12 June 1998;
- the USEPA registration of Kelly AFB as a generator and transporter of hazardous waste (USEPA ID No. TX2571724333: and
- the TCEQ registration of Kelly AFB as a hazardous and industrial waste management facility (Solid Waste Registration No. 31750)."

The report states SAIC prepared the study "to evaluate and recommend soil and groundwater final remediation alternatives for Zones 2 and 3 sites determined to have chemicals of concern that exceed the Risk Reduction Standard No. 2 criteria."

Organization of Report

The report is divided into the following sections:

Section 1 - Introduction/Purpose – outlines the scope and regulatory framework for the Zones 2 and 3 CMS and installation history.

Section 2 – Media Cleanup Standards – a listing of site-specific chemicals of concern (COC) for each source area as well as groundwater and their respective cleanup standard.

Section 3 – Description of Current Conditions and Conceptual Site Model – a summary description of source areas and extent of groundwater contamination, including a description of existing interim remedial actions.

Section 4 – Source Alternatives – this section provides details on each source area, including the horizontal and vertical extent of contamination. For each source area, corrective measures alternatives are identified and evaluated.

Section 5 – Groundwater Alternatives – This section details the extent of groundwater contamination for Zones 2 and 3. A summary description of the fate-and-transport modeling that was performed to evaluate the groundwater corrective measures alternatives is presented. Appendix F provides a detailed account of the development and calibration of this model. The groundwater corrective measures alternatives are identified and evaluated.

Section 6 – Selection of the Preferred Corrective Measures Alternative- a final evaluation and presentation of the preferred corrective measures alternatives for each source area and the groundwater contamination.

Appendices

Appendix A – Zone 2 and 3 IRP Units and SWMUs and Closure Status
Appendix B – Detailed Source Alternatives Cost Analyses
Appendix C – 2002 Groundwater Data for Plume Revision
Appendix D – 2003 Groundwater Data for Plume Revision
Appendix E – Assessment of Vapors Arising from Subsurface Contamination Beneath the Northwest Corner of Building 360 at Former Kelly Air Force Base
Appendix F – Update of the March 2002 Basewide Groundwater Flow Model and Development of Zones 2 and 3 Flow and Transport Model for Remediation Alternatives at Former Kelly AFB, Texas
Appendix G – Detailed Groundwater Alternatives Cost Analyses

Summary of the Technical Content of Report

Fourteen areas were evaluated with respect to the Risk Reduction No. 2 criteria. It was determined that eight areas exceed Risk Reduction Standard No. 2 criteria. They are as follows:

Zone 2
Site E-1
Building 522

Zone 3
Building 301
Building 360 Northwest Corner Source Area
Building 360 Basement Source Area
Building 258
Building 348 OWS and Calibration Fuel Spill
Building 324

The following Corrective Action Alternatives were evaluated:

Site E-1

Alternative 1 – No Action
Alternative 2 – Continued Operation of Collection Trench
Alternative 3 – Continued Operation of Collection Trench with Soil Flushing
Alternative 4 – Excavation of Contaminated Soils
Alternative 5 – Vadose Zone Soil Excavation and Continued Trench Operation
Alternative 6 – Minimal Excavation combined with Soil Vapor Extraction with Six-phase Heating
Alternative 7 – Soil Vitrification

Alternative 8 – Bioaugmentation and Excavation

Building 522

Alternative 1 – No Action
Alternative 2 – Maintain and Optimize Current SVE System
Alternative 3 – Excavation with Organic Substrate Backfill
Alternative 4 – Bioaugmentation and Soil Vapor Extraction
Alternative 5 – Soil Vapor Extraction with Six-phase Heating

Building 301

Alternative 1 – No Action
Alternative 2 – Permeable Reactive Barrier Maintenance
Alternative 3 – Excavation with Organic Substrate Backfill
Alternative 4 – Excavation and Bioaugmentation
Alternative 5 - Soil Vapor Extraction
Alternative 6 – Soil Vapor Extraction with Six-phase Heating

Building 360 Northwest Corner Source

Alternative 1 – No Action
Alternative 2 – Permeable Reactive Barrier Maintenance
Alternative 3 – Excavation
Alternative 4 – Soil Vapor Extraction
Alternative 5 – Soil Vapor Extraction with Six-phase Heating

Building 360 Basement Source Area

Alternative 1 – No Action
Alternative 2 – Permeable Reactive Barrier Maintenance
Alternative 3 – Bioaugmentation
Alternative 4 – Soil Vapor Extraction with Six-phase Heating

Building 258

Alternative 1 – No Action
Alternative 2 – DNAPL Extraction and Groundwater Recovery
Alternative 3 – Slurry Wall Repair with Limited PRB Installation
Alternative 4 – DNAPL Extraction and Extracted Groundwater PRB
Alternative 5 – Excavation
Alternative 6 – Soil Vapor Extraction with Six-phase Heating
Alternative 7 – DNAPL Extraction with Soil Vapor Extraction

Building 348 OWS and Calibration Fluid Spill

Alternative 1 – No Action
Alternative 2 – Institutional Controls Only
Alternative 3 – Excavation and LNAPL Pumping
Alternative 4 – Soil Vapor Extraction and Passive Bailing

Building 324

Alternative 1 – No Action
Alternative 2 – Institutional Controls Only
Alternative 3 – Excavation
Alternative 4 – Soil Vapor Extraction

For each of the Alternatives listed above, the following criteria were evaluated:

Overall Protection of Human Health and the Environment
Attainment of Media Cleanup Standards
Control Source of Releases
Comply with Applicable Standards for Management of Wastes
Long-term Reliability and Effectiveness
Reduction of Toxicity, Mobility, or Volume
Short-Term Effectiveness
Implementability
Cost
Comparative Analyses of Alternatives.

After all the alternatives and criteria were reviewed, the following corrective measures were recommended.

Site E-1 - Vadose Zone Soil Excavation and Continued Trench Operation with Limited Soil Excavation in the Saturated Zone (Alternative 5 and part of Alternative 4).

Building 522 - Bioaugmentation and Soil Vapor Extraction (Alternative 4)

Building 301 - Permeable Reactive Barrier Maintenance with Six-phase Heating (Alternative 2 and part of Alternative 6)

Building 360 Northwest Corner Source - Soil Vapor Extraction (Alternative 4)

Building 360 Basement Source Area - Bioaugmentation (Alternative 3)

Building 258 - DNAPL Extraction and Groundwater Recovery (Alternative 2)

Building 348 - Soil Vapor Extraction and Passive Bailing (Alternative 4)

Building 324 - Soil Vapor Extraction (Alternative 4)

Technical Review

Page	Location	Comment
3-5 and 3-6	Figure 3-2 and 3-3	The patterns for sand and black clay are different in the two figures. This may be the result of a different scale for the two figures. Soil Boring SB115 is different in the two figures Geologic interpretation has minor technical flaws.

3-25	Figure 3-12	Gravel strata in SS040RW262 is inverted.
3-29	Line 2	Discusses PCE in subsurface soils. In the table it lists Tetrachloroethene. Use consistent terminology.
3-30	Figure 3-15	Borings KY123SB007, 008 and 009 are not shown. Is contamination area circular?
4-12	Figure 4-2	How will the groundwater trench continue to operate if excavated? Are there provisions for the protection or replacement of the trench? The same comment applies to Figure 4-3 and Figure 4-6.
4-14	Figure 4-5	How will vitrification impact the groundwater trench?
4-28	Figure 4-11	What happens to the permeable reactive barrier in Area D when the soils are excavated? Will it be protected or replaced?
4-30	Figure 4-12	There are no activities proposed for Area D.
4-31	Figure 4-13	Will SVE efficiency be impacted by the permeable reactive barrier?
4-33	Figure 4-14	Will heating impact the permeable reactive barrier?
4-38	Lines 11-13	Since the vapor extraction wells and electrodes will be installed vertically; the surface equipment should keep this area relatively unusable for the duration of the remedial activities.
4-51	Figure 4-23	Will need sheet piling on both sides of the slurry wall in the southeast corner.
4-50	Line 21	There is no mention of the excavation of the soils outside the slurry wall.
4-52	Figure 4-24	If the area outside the slurry wall will be excavated, there will need to be sheet piling to protect the slurry wall.
4-55	Line 6	Can you dismiss the calibration fluid just because it has not been characterized chemically?
4-62	Figure 4-30	Extent of contamination is circular. Are there controls? The same comment applies to figure 4-31.
4-76	Table 4-11	What are the criteria for costs in terms of the three circles? The same comment applies to Tables 4-14, 4-17, 4-20, 4-23, 4-26, 4-29, 4-32, and 5-19.

6-1	Lines 17-20	The report states that Alternative 4 is preferable to 6 or 8 due to the lower assurance of contaminant removal. Table 4-11 (page 4-76) shows that Alternative 6 is equal or better in all categories.
6-2	Lines 1-14	According to Tables 4-13 and 4-14, Alternative 5 appears to be the best. It is only moderately higher in cost yet 10 years shorter in duration and meets all of the criteria.
6-3	Lines 13-17	Report states difficulties with bioaugmentation tests yet recommends bioaugmentation. Alternative 4 appears to rate the same (Table 4-23)
6-3	Lines 18-35	The recommended Alternative (2) scores marginally in attainment of cleanup standards and in reduction in the toxicity, mobility or volume of waste. Alternative 6 scores better in these areas for less dollars and less time.

Conclusions and Recommendations

Conclusions

Based upon our review of the documents provided, we conclude the following:

- The report was written clearly and was easily understood. There were no distractions caused by typographic errors or other production problems.
- The report was well organized and presented in a format that is east to follow.
- There are several technical issues that need revision or clarification.
- The recommended alternatives for some of the areas do not seem to correspond with the apparent best alternatives as presented in the tables.

Recommendations

Based upon our findings, we recommend the following:

- Revise or clarify the technical issues listed in this report.
- The recommended alternatives need to be re-evaluated or perhaps better explanations should be provided.

Document Review

Corrective Measures Study Zones 2 and 3
Draft Final
Former Kelly Air Force Base

Prepared for:
Kelly Air Force Base
Restoration Advisory Board
January 18, 2005

Neathery Environmental Services

Purpose of Review

Conduct a review of the CMS report prepared by Science Applications International Corporation (SAIC) to includes:

- **A simple explanation of work performed**
- **A technical review of the document**

Neathery Environmental Services

Document Reviewers

Jeffrey S. Neathery, P.G.
Neathery Environmental Services

Christopher Mathewson, Ph.D., P.E., P.G
Texas A&M University

Neathery Environmental Services

Limitations

The report was reviewed as a "stand alone" document. Information contained in Section 3 (Description of Current Conditions and Conceptual Site Model) relied on information from other sources. For the purpose of this review, the external information is assumed to be accurate.

Neathery Environmental Services

Report Components

Acronyms and Abbreviations
Executive Summary
1.0 Introduction/Purpose
2.0 Media Cleanup Standards
3.0 Description of Current Conditions & Conceptual Site Model
4.0 Development & Detailed Analysis of Source Area Alternatives
5.0 Development & Detailed Analysis of Groundwater Alternatives
6.0 Recommended Alternatives
7.0 References

Neathery Environmental Services

Purpose of the CMS

The purpose of the CMS is to "evaluate an recommend soil and groundwater final remediation alternatives for Zones 2 and 3 sites determined to have chemicals of concern that exceed Risk Reduction No. 2 criteria".

Neathery Environmental Services

Source Areas

Fourteen source areas were evaluated with respect to Risk Reduction No. 2 criteria. Eight sites were found to exceed the Risk reduction No. 2 criteria.

Zone 2	Zone 3
Site E-1	Building 258
Building 522	Building 301
	Building 324
	Building 348
	Building 360 NW corner
	Building 360 Basement

Neathery Environmental Services

Media Cleanup Standards

Media cleanup standards were calculated for the chemicals of concern (COC) found at each of the 8 sites that exceed Risk Reduction No. 2 standards. Cleanup standards were calculated for both soil and groundwater. Soil cleanup for the 8 sites are addressed individually. The groundwater plume will be addressed as one unit.

Neathery Environmental Services

Source Removal Technologies

Excavation
Excavation with organic substrate backfill
Soil Vapor Extraction (SVE)
Thermally Enhanced SVE (six-phase soil heating)
[illegible]raction (recovery wells)
[illegible]ntation
[illegible]ng

Neathery Environmental Services

Source Control Technologies

Slurry Walls
Permeable Reactive Barrier
Pump and Treat
Vitrification

Neathery Environmental Services

Evaluation Criteria

- Overall Protection of Human Health & Environment
- Attainment of Media Cleanup Standards
- Control Source of Releases
- Compliance with Applicable Standards for Management of Wastes
- Long-Term Reliability and Effectiveness
- Reduction of Toxicity, Mobility or Volume
- Short-Term Effectiveness
- Implementability and Cost

Neathery Environmental Services

Source Area Alternatives for Site E-1

Alt 1 – No Action
Alt 2 – Continued Operation of Collection Trench
Alt 3 – Continued Operation of Collection Trench with Soil Flushing
Alt 4 – Excavation of Contaminated Soils
Alt 5 – Vadose Zone Soil Excavation and Continued Trench Operation
Alt 6 – Minimal Excavation combined with Soil Vapor Extraction with Six-phase Heating
Alt 7 – In Situ Vitrification
Alt 8 – Bioaugmentation and Excavation

Neathery Environmental Services

Cost Summary for Site E-1

Source Area Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 – No Action – discontinue collection trench operation	$0	$0	$0	NA
Alt 2 – Operate existing system	$17,424	$64,887,143	$64,904,567	600 yrs
Alt 3 – Operate existing system and flush soils with discharge water	$197,800	$16,221,786	$16,419,586	150 yrs
Alt 4 – Excavation of vadose and limited saturated soils backfill with a layer of organic substrate and continue to operate existing system.	$4,416,089	$6,104,966	$10,521,055	60 yrs
Alt 5 – Excavation of vadose soils only and continue to operate existing system	$1,389,320	$12,977,429	$16,366,748	120 yrs
Alt 6 – Excavation of surface soils with Electrical Resistive Heating (ERH), followed by limited trench operation.	$3,761,171	$508,747	$4,269,918	5 yrs monitor & trench operation
Alt 7 – Soil Vitrification	$25,820,033	$167,099	$25,987,131	5 yrs monitor
Alt 8 – Bioaugmentation and excavation of vadose soils only	$3,827,301	$1,311,676	$5,138,977	5 yrs operation, 5 yrs monitor

Neathery Environmental Services

Comparative Analysis of Alternatives for Site E-1

Criteria	Alt 1 No Action	Alt 2 Operate Existing System	Alt 3 Operate Existing System and Flush Vadose Soils	Alt 4 Excavation of Vadose and Limited Saturated Soils, Backfill with a Layer of Organic Substrate, Continue to Operate Existing System	Alt 5 Excavation of Vadose Soils, Continue to Operate Existing System	Alt 6 Excavation of Surface & Metals Soils, six-phase Heating	Alt 7 Soil Vitrification	Alt 8 Bioaugmentation and Excavation of Vadose Soils
Overall protection of human health and the environment	○	●	●	●	●	●	●	●
Attainment of media cleanup standards	○	●	●	●	●	●	●	●
Control of source releases	○	●	●	●	●	●	●	●
Compliance with waste management standards	○	●	●	●	●	●	●	●
Long-term reliability and effectiveness	○	●	◐	●	●	●	●	◐
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	●	●	●	●	●
Short-term effectiveness	○	●	●	◐	◐	●	●	●
Implementability	●	●	●	●	●	●	◐	◐
Cost	●	○	○	○	○	◐	○	◐

Neathery Environmental Services

Recommended Alternative for Site E-1

Alt 1 – No Action
Alt 2 – Continued Operation of Collection Trench
Alt 3 – Continued Operation of Collection Trench with Soil Flushing
Alt 4 – Excavation of Contaminated Soils
Alt 5 – Vadose Zone Soil Excavation and Continued Trench Operation
Alt 6 – Minimal Excavation combined with Soil Vapor Extraction with Six-phase Heating
Alt 7 – Vitrification
Alt 8 – Augmentation and Excavation

Neathery Environmental Services

Recommended Alternative for Building 522

Alt 1 – No Action
Alt 2 – Maintain and Optimize Current SVE System
Alt 3 – Excavation with Organic Substrate Backfill
Alt 4 – Bioaugmentation and Soil Vapor Extraction
Alt 5 – Soil Vapor Extraction with Six-phase Heating

Neathery Environmental Services

Recommended Alternative for Building 301

Alt 1 – No Action
Alt 2 – Permeable Reactive Barrier Maintenance
Alt 3 – Excavation with Organic Substrate Backfill
Alt 4 – Excavation and Bioaugmentation
Alt 5 – Soil Vapor Extraction
Alt 6 – Soil Vapor Extraction with Six-phase Heating

Neathery Environmental Services

Recommended Alternative for Building 360 NW Corner

Alt 1 – No Action
Alt 2 – Permeable Reactive Barrier Maintenance
Alt 3 – Excavation
Alt 4 – Soil Vapor Extraction
Alt 5 – Soil Vapor Extraction with Six-phase Heating

Neathery Environmental Services

Recommended Alternative for Building 360 Basement

Alt 1 – No Action
Alt 2 – Permeable Reactive Barrier Maintenance
Alt 3 – Bioaugmentation
Alt 4 – Soil Vapor Extraction with Six-phase Heating

Neathery Environmental Services

Recommended Alternative for Building 258

Alt 1 – No Action
Alt 2 – DNAPL Extraction and Groundwater Recovery
Alt 3 – Slurry Wall Repair with Limited PRB Installation
Alt 4 – DNAPL Extraction and Extracted Groundwater PRB
Alt 5 – Excavation
Alt 6 – Soil Vapor Extraction with Six-phase Heating
Alt 7 – DNAPL Extraction with Soil Vapor Extraction

Neathery Environmental Services

Recommended Alternative for Building 348

Alt 1 – No Action
Alt 2 – Institutional Controls Only
Alt 3 – Excavation and LNAPL Pumping
Alt 4 – Soil Vapor Extraction and Passive Bailing

Neathery Environmental Services

Recommended Alternative for Building 324

Alt 1 – No Action
Alt 2 – Institutional Controls Only
Alt 3 – Excavation
Alt 4 – Soil Vapor Extraction

Neathery Environmental Services

Recommended Alternative for Groundwater

Alt 1 – No Action – Cease to Operate Groundwater System
Alt 2 – Operate All Current Systems
Alt 3 – Replace Existing System with Permeable Reactive Barrier at Zones 2 & 3 Boundary
Alt 4 – Replace CS-2NB Recovery Wells with Permeable Reactive Barrier (and Chromium Bioremediation)
Alt 5 – Replace IWTP and CS-2NB Recovery Wells with Permeable Reactive Barrier

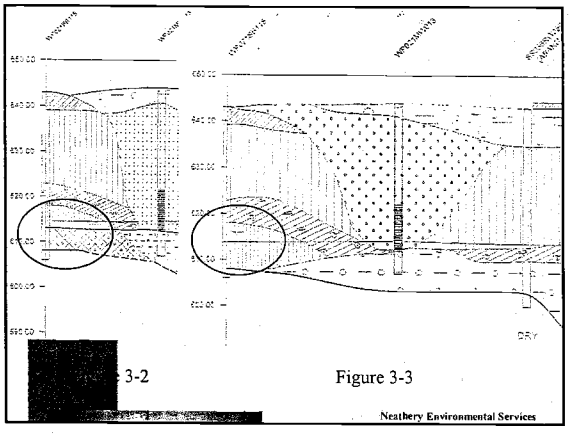
Neathery Environmental Services

Technical Review

Page 3-5 and 3-6, Figures 3-2 and 3-3.

- Sand pattern different.
- Soil Boring SB115 is different in the two Figures
- Geologic interpretation has minor technical flaws

Neathery Environmental Services



3-2 Figure 3-3

Neathery Environmental Services

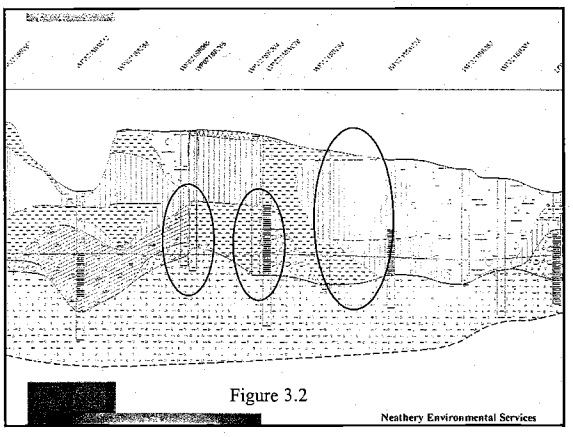


Figure 3.2

Neathery Environmental Services

Technical Review

Page 3-25, Figure 3-12.

Gravel strata in SS040RW262 is inverted

Neathery Environmental Services

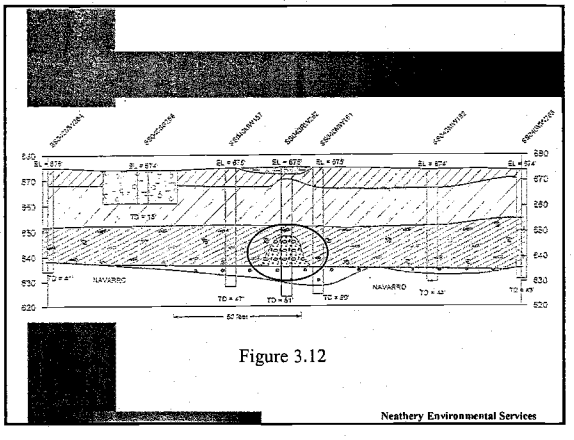


Figure 3.12

Neathery Environmental Services

Technical Review

Page 3-29, Line 2.

PCE terminology used in text – Tetrachloroethene used in table.

3.2.1.7 Building 324

PCE in subsurface soils is the only contamination present that exceeds the RRS No. 2 value (USAF 2004), as shown in Table 3-7.

Table 3-7
Summary of Site-Specific Subsurface COC
Building 324 Area

Chemical of Concern	Location of Maximum Detection	Maximum Detected Concentration	RRS No. 2 Value
Tetrachloroethene	KY123SB010	650 ppb	500 ppb

Bolded contaminant exceed RRS No. 2 values

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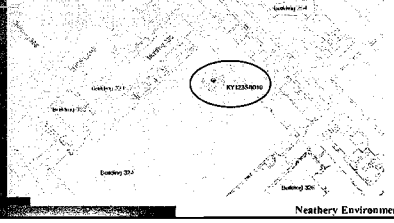
Technical Review

Page 3-30, Figure 3-15.

Boring KY123SB007, 008 and 009 not shown. Is contamination area circular? The same comment applies to Figures 4-30 and 4-31.



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Technical Review

Page 4-12, Figure 4-2. (Site E-1)

- How will the groundwater trench continue to operate if excavated? Are there provisions for the protection or replacement of the trench? Are there additional costs? This comment also applies to Figures 4-3 and 4-6.

Page 4-13, Figure 4-5.

- [illegible] vitrification impact the trench?

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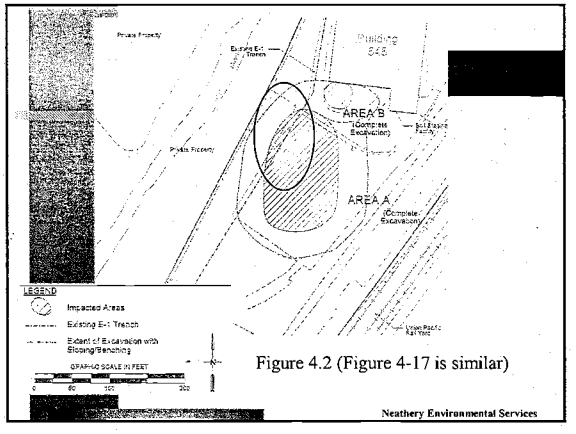

Figure 4.2 (Figure 4-17 is similar)

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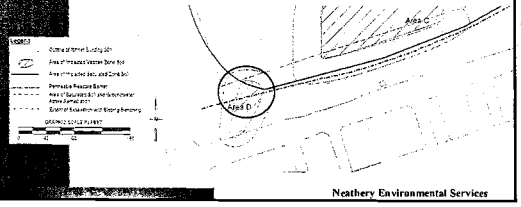
Technical Review

Page 4-28, Figure 4-11. (Building 301)

- What happens to the permeable reactive barrier in Area D when the soils are excavated? Will it be protected or replaced? Are there additional costs?



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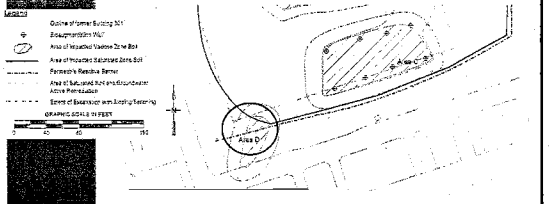
Technical Review

Page 4-30, Figure 4-12. (Building 301)

- There are no bioaugmentation activities proposed for Area D.



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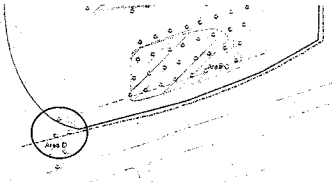
Technical Review

Page 4-31, Figure 4-13. (Building 301)

- Will the Soil Vapor Extraction efficiency be impacted by the permeable reactive barrier?



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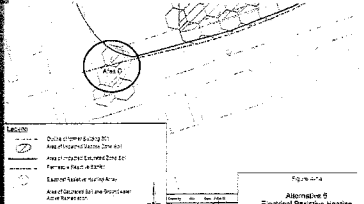
Technical Review

Page 4-33, Figure 4-14. (Building 301)

- Will heating impact tbe permeable reactive barrier?



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Technical Review

Page 4-38, Lines 11-13. (Building 360 NW corner)

Since the vapor extraction wells and electrodes will be installed vertically, the surface equipment should keep this area relatively unusable for the duration of the remedial activities.

4.3.4.1.5 Alternative 5: SVE with Six-phase Heating

SVE enhanced by six-phase heating will be used to address the contaminated soils in the northwest corner of Building 360. Six-phase heating will be implemented in hexagonal arrays 150 feet diameters) of vertically inserted electrodes covering the entire impacted area. The active electrodes will extend to approximately 10 feet bgs. A combination of neutral electrode and soil vapor extraction wells will be located at the center of each hexagon. SVE wells will also ring the treatment area to intercept vaporized contaminates migrating from the site. Temporary aboveground systems will be required for power distribution and voltage control, soil vapor extraction blowers, condensate collection, and vapor treatment. The estimated time required for treatment by six-phase heating is 6 months. Industrial activities in the immediate area of the six-phase heating will only be temporarily disrupted during well and electrode installation.

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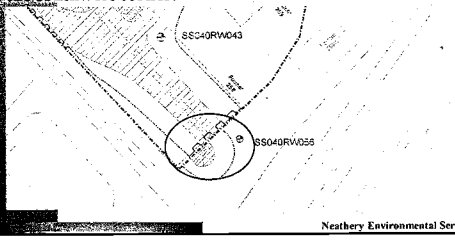
Technical Review

Page 4-51, Figure 4-23.

There will need to be sheet piling on both sides of the slurry wall in the southwest corner.



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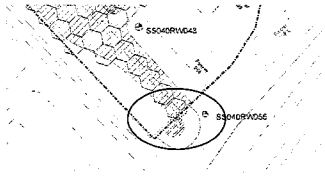
Technical Review

Page 4-52, Figure 4-24. (Building 258)

If the area outside the slurry wall will be excavated, there will need to be sheet piling to protect the slurry wall. There is no mention of the excavation outside the slurry wall. (Page 4-50, Lines 27-38)



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Technical Review

Page 4-55, Lines 6-8. (Building 348)

Can you dismiss the calibration fluid just because it as not been characterized chemically?

4.3.6 BUILDING 348 OWS AND CALIBRATION FLUID SPILL

The contaminants for this area include PCE in the subsurface at the site of the former OWS and LNAPL (calibration fluid) in the subsurface in the parking area and street on the east side of Building 348. The lateral extent of PCE contamination is limited to the immediate area of the former OWS. The estimated volume of contaminated soil is 122 yd³. The calibration fluid has not been characterized chemically; only fingerprint and total petroleum hydrocarbons (TPH) analyses have been performed. Thus, there are no chemical contaminants that exceed site cleanup criteria. The LNAPL remedial action goal is therefore removal to the maximum extent practicable (MEP). The volume of LNAPL estimated to be present in the subsurface is 62,000 gallons. Table 4-7 summarizes the remediation alternatives for the areas of the Building 348 former OWS and of the calibration fluid.

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Technical Review

Page 4-76, Table 4-11. (General Comment)

What are the cost criteria for the three circles? The same comment applies to All the Comparative Analyses tables.

releases	○	●	●	●	●	●	●	●
Compliance with waste management standards	○	●	●	●	●	●	●	●
Long-term reliability and effectiveness	○	●	◐	●	●	●	●	◐
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	●	●	●	●	●
Short-term effectiveness	○	●	●	◐	◐	◐	●	●
Implementability	●	●	●	●	●	●	◐	◐
Cost	●	○	○	○	○	◐	○	◐

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Technical Review

Page 5-20, Table 5-4.

Delete the reference to Building 522 on the groundwater alternative table.

Chart for Comparative Analysis of Groundwater Alternatives for Building 522 Corrective Measures

Criteria	Alt 1 No Action	Alt 2 Operate All Current Systems	Alt 3 Replace the Existing System with PRB at Zones 2 and 3 boundary	Alt 4 Replace CS-2NB Recovery Wells with PRB	Alt 5 Replace IWTP and CS-2NB Recovery Wells with PRBs
Overall protection of human health and the environment	○	●	●	●	●
Attainment of media cleanup standards	○	◐	◐	◐	◐
Control of source releases	NA	NA	NA	NA	NA

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Technical Review

Page 6-1, Lines 7-22.

The report states that for Site E-1, Alternative 4 is preferable.

According to Tables 4-10 and 4-11 (page 4-75 and 4-76) Alternative 6 is equal or better in all categories, costs 6 million dollars less and is 55 years shorter in duration.

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Cost Summary for Site E-1

Source Area Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 – No Action – discontinue collection trench operation	$0	$0	$0	NA
Alt 2 – Operate existing system	$17,424	$64,887,143	$64,904,567	600 yrs
Alt 3 – Operate existing system and flush soils with discharge water	$197,800	$16,221,786	$16,419,586	150 yrs
Alt 4 – Excavation of vadose and limited saturated soils backfill with a layer of organic substrate and continue to operate existing system.	$4,416,089	$6,104,966	$10,521,055	60 yrs
Alt 5 – Excavation of vadose soils only and continue to operate existing system	$3,389,320	$12,977,429	$16,366,748	120 yrs
Alt 6 – Excavation of surface soils with Electrical Resistive Heating (ERH), followed by limited trench operation.	$3,761,171	$508,747	$4,269,918	5 yrs monitor & trench operation
Alt 7 – Soil Vitrification	$25,820,033	$167,099	$25,987,131	5 yrs monitor
Alt 8 – Bioaugmentation and excavation of vadose soils only	$3,827,301	$1,311,676	$5,138,977	5 yrs operation, 5 yrs monitor

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Comparative Analysis of Alternatives for Site E-1

Criteria	Alt 1 No Action	Alt 2 Operate Existing System	Alt 3 Operate Existing System and Flush Vadose Soils	Alt 4 Excavation of Vadose and Limited Saturated Soils, Backfill with a Layer of Organic Substrate, Continue to Operate Existing System	Alt 5 Excavation of Vadose Soils, Continue to Operate Existing System	Alt 6 Excavation of Surface & Vadose Soils, Shallow Heating	Alt 7 Soil Vitrification	Alt 8 Bioaugmentation and Excavation of Vadose Soils
Overall protection of human health and the environment	○	●	●	●	●	●	●	●
Attainment of media cleanup standards	○	●	●	●	●	●	●	●
Control of source releases	○	●	●	●	●	●	●	●
Compliance with waste management standards	○	●	●	●	●	●	●	●
Long-term reliability and effectiveness	○	●	◐	●	●	●	●	◐
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	●	●	●	●	●
Short-term effectiveness	○	●	●	◐	◐	●	●	●
Implementability	●	●	●	●	●	●	◐	◐
Cost	●	○	○	○	○	◐	○	◐

Neathery Environmental Services

Technical Review

Page 6-2, Lines 1-14.

The report states that for Building 522, Alternative 4 is preferable.

According to Tables 4-13 and 4-14 (page 4-81 and 4-82), Alternative 3 is equal or better in all categories, costs 400,000 dollars less and is 10 years shorter in duration.

Neathery Environmental Services

Cost Summary for Building 522

Source Area Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 - No Action-discontinue operation of current system	$0	$0	$0	NA
Alt 2 - Maintain current SVE and optimize	$121,475	$335,728	$457,203	5 years
Alt 3 - Excavation (vadose & saturated), Dewatering for Excavation, backfill with a layer of organic substrate	$649,971	$80,739	$730,710	5 yrs monitor
Alt 4 - Bioaugmentation and Optimized SVE	$384,052	$747,735	$1,131,788	10 yrs operation, 5 yrs monitor
Alt 5 - Soil Vapor Extraction with Six-phase Heating	$1,376,969	$80,739	$1,457,708	5 yrs monitor

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Comparative Analysis of Alternatives for Building 522

Criteria	Alt 1 No Action	Alt 2 Maintain Current SVE and Optimize	Alt 3 Excavation, Backfill with a Layer of Organic Substrate	Alt 4 Bioaugmentation and SVE	Alt 5 SVE with Six-phase Heating
Overall protection of human health and the environment	○	●	●	●	●
Attainment of media cleanup standards	○	●	●	●	●
Control of source releases	○	◐	●	◐	●
Compliance with waste management standards	○	●	●	●	●
Long-term reliability and effectiveness	○	◐	●	◐	●
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	◐	●
Short-term effectiveness	○	●	●	●	●
Implementability	●	●	●	●	●
Cost	●	◐	◐	◐	◐

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Technical Review

Page 6-2, Lines 1-14.

The report states that for Building 301, Alternative 2 is preferable.

According to Tables 4-16 and 4-17 (page 4-87 and 4-88), Alternative 4 is equal or better in all categories, costs $200,000 dollars less and is 75 years shorter in duration.

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Cost Summary for Building 301

Source Area Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 - No Action	$0	$0	$0	NA
Alt 2 - No further action other than maintain PRB	$0	$10,083,894	$10,083,894	250 yrs
Alt 3 - Excavation (vadose & limited saturated), Dewatering for Excavation, backfill with a layer of organic substrate, maintain PRB	$6,628,600	$5,049,744	11,678,344	75 yrs maintain PRB
Alt 4 - Bioaugmentation and Excavation, maintain PRB	$3,145,899	$6,145,723	$9,291,622	75 yrs maintain PRB
Alt 5 - Soil Vapor Extraction with Water Table Depression, maintain PRB	$1,300,255	$7,383,340	$8,683,595.	75 yrs maintain PRB
Alt 6 - Soil Vapor Extraction with Electrical Resistive Heating (ERH), maintain PRB	$2,010,899	$5,050,832	$7,061,731	75 yrs maintain PRB

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Comparative Analysis of Alternatives for Building 301

Criteria	Alt 1 No Action	Alt 2 No further action other than maintain PRB	Alt 3 Excavation, backfill with a layer of organic substrate, maintain PRB	Alt 4 Bioaugmentation and Excavation, maintain PRB	Alt 5 Soil Vapor Extraction, maintain PRB	Alt 6 Six-phase Heating, maintain PRB
Overall protection of human health and the environment	○	●	●	●	●	●
Attainment of media cleanup standards	○	●	●	●	●	●
Control of source releases	○	●	●	●	●	●
Compliance with waste management standards	○	●	●	●	●	●
Long-term reliability and effectiveness	○	●	●	●	◐	●
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	●	●	●
Short-term effectiveness	○	●	●	●	●	●
Implementability	●	◐	●	◐	●	●
Cost	●	○	○	◐	◐	◐

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Technical Review

Page 6-3, Lines 13-17.

For Building 360 (basement area), the report states difficulties with the bioaugmentation tests, yet recommends bioaugmentation. Alternative 4 appears to rate the same.

6.1.5 SELECTION OF RECOMMENDED ALTERNATIVE FOR BUILDING 360 BASEMENT AREA

Based on the evaluation of alternatives presented in Section 4.5, one alternative was retained for final consideration. This is Alternative 3: bioaugmentation. The other three alternatives were rejected for various reasons. Alternative 1 leaves the majority of the contaminant mass in place and, thus, does not satisfy the RAS No. 2 requirement for contaminant removal. Alternative 2 relies solely on the PRB for protection against contaminant migration and, as a consequence, must be maintained over a long period of time before the source mass is depleted. Alternative 4 is comparable in cost to Alternative 3, but higher. Based on experience with hydraulic control aspects of the Building 360 bioaugmentation test, a bioaugmentation measure may be difficult to implement successfully, thus, an evaluation of recirculation versus flooding mode of bioaugmentation should be performed during the design stage. Alternative 3 is the recommended alternative.

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Cost Summary for Building 360 Basement

Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 – No Action	$0	$0	$0	NA
Alt 2 – No further action other than maintain PRB	$0	$44,796,195	$44,796,195	250 yrs maintain PRB
Alt 3 – Bioaugmentation	$247,105	$299,973	$547,078	5 yr bioaugmentation operation, 3 yrs monitor after bioaugmentation
Alt 4 – Electric Resistive Heating & SVE	$940,592	$92,053	$1,032,645	5 yrs monitor after ERH

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Comparative Analysis of Alternatives for Building 360 bsmt

Criteria	Alt 1 No Action	Alt 2 No Further Action other than Maintain PRB	Alt 3 Bioaugmentation	Alt 4 Sixphase Heating
Overall protection of human health and the environment	○	●	●	●
Attainment of media cleanup standards	○	●	●	●
Control of source releases	○	●	●	●
Compliance with waste management standards	○	●	●	●
Long-term reliability and effectiveness	○	●	●	●
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	●
Short-term effectiveness	○	●	●	●
Implementability	●	●	◐	◐
Cost	●	○	◐	◐

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Technical Review

Page 6-3, Lines 18-35.

The report states that for Building 258, Alternative 2 is preferable.

According to Tables 4-25 and 4-26 (page 4-101 and 4-102), Alternative 6 is equal or better in all categories, costs 2.1 million dollars less and is 75 years shorter in duration.

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Cost Summary for Building 258

Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 – No Action	$0	$387,251	$387,251	0
Alt 2 – DNAPL Extraction & Groundwater Recovery	$175,152	$12,891,549	$13,066,701	100 yrs pump & treat for residual recovery
Alt 3 – Slurry Wall Repair & Limited PRBs	$1,836,195	$94,570,050	$96,406,246	1,000 yrs maintain wall
Alt 4 – DNAPL Extraction & PRB on Extracted Groundwater	$1,803,272	$11,110,183	$12,913,455	100 yrs maintain wall and pump
Alt 5 – Excavation	$13,605,967	$2,085,076	$14,691,043	5 yrs pump and treat for residual recovery
Alt 6 – Electrical Resistive Heating	$5,674,496	$5,288,118	$10,962,614	25 yrs pump and treat for residual recovery
Alt 7 – DNAPL Extraction and SVE	$528,665	$13,913,422	$14,442,087	5 yrs SVE, 100 yrs pump and treat for residual recovery

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Comparative Analysis of Alternatives for Building 258

Criteria	Alt 1 No Action	Alt 2 DNAPL Extraction & Groundwater Recovery	Alt 3 Slurry Wall Repair & Limited PRBs	Alt 4 DNAPL Extraction & PRB on Extracted Groundwater	Alt 5 Excavation	Alt 6 Electrical Resistive Heating	Alt 7 DNAPL Extraction and SVE
Overall protection of human health and the environment	○	●	●	●	●	●	●
Attainment of media cleanup standards	○	◐	●	◐	●	●	◐
Control of source releases	○	●	●	●	●	●	●
Compliance with waste management standards	○	●	●	●	●	●	●
Long-term reliability and effectiveness	○	●	●	●	●	●	●
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	◐	◐	●	◐
Short-term effectiveness	○	●	●	●	◐	●	●
Implementability	●	●	●	●	●	●	●
Cost	●	◐	○	◐	◐	◐	◐

Neathery Environmental Services

Technical Review

Page 6-4, Lines 16-18.

The report states that for Zone 2 and 3 Groundwater, Alternative 4 is preferable.

According to Tables 5-3 and 5-4 (page 5-19 and 5-20), Alternatives 3 and 5 are equal or better in all categories, costs 1 million and 1.75 million dollars less and take the same amount of time.

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Cost Summary for Groundwater

Groundwater Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 – No Action - Cease to Operate the Groundwater Recovery System	$0	$0	$0	NA
Alt 2 – Operate All Current Systems	$0	$12,768,900	$12,087,328	20 years
Alt 3 – Replace the Existing System with PRB at Zones 2 and 3 Boundary	$2,665,108	$8,199,004	$10,323,591	25 years
Alt 4 – Replace CS-2NB Recovery Wells with PRB	$3,369,743	$8,606,003	$11,382,401	25 years
Alt 5 – Replace IWTP and CS-2ND Recovery Wells with PRBs	$4,189,134	$5,924,181	$9,631,398	25 years

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Comparative Analysis of Alternatives for Groundwater

Criteria	Alt 1 No Action	Alt 2 Operate All Current Systems	Alt 3 Replace the Existing System with PRB at Zones 2 and 3 boundary	Alt 4 Replace CS-2NB Recovery Wells with PRB	Alt 5 Replace IWTP and CS-2ND Recovery Wells with PRBs
Overall protection of human health and the environment	○	●	●	●	●
Attainment of media cleanup standards	○	◐	◐	◐	◐
Control of source releases	NA	NA	NA	NA	NA
Compliance with waste management standards	○	●	●	●	●
Long-term reliability and effectiveness	○	●	●	●	●
Reduction in the toxicity, mobility, or volume of wastes	○	●	●	●	●
Short-term effectiveness	○	●	●	●	●
Implementability	●	●	●	●	●
Cost	●	◐	◐	◐	◐

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Technical Review

Source areas where the preferred alternative does not match the data presented.

Zone 2	Zone 3
Site E-1	Building 258
Building 522	Building 301
	Building 324
	Building 348
	Building 360 NW corner
	Building 360 Basement

Zone 2 and 3 Groundwater

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Conclusions

- The report was well organized, written clearly and easily understood. There were no distractions caused by typographic error or production problems.
- There are several technical issues that need revision or clarification.
- The recommended alternatives for some of the areas do not to correspond with the apparent best alternatives as presented in the tables.

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Recommendations

- Revise or clarify the technical issues listed in this report.
- The recommended alternatives need to be re-evaluated or better explanations provided. The recommended alternative should be consistent from the tables.

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Additional Slides

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Recommended Alternative for Building 522

Alt 1 - No Action
Alt 2 - Maintain and Optimize Current SVE System
Alt 3 - Excavation with Organic Substrate Backfill
Alt 4 - Bioaugmentation and Soil Vapor Extraction
Alt 5 - Soil Vapor Extraction with Six-phase Heating

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Cost Summary for Building 522

Source Area Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 - No Action-discontinue operation of current system	$0	$0	$0	NA
Alt 2 - Maintain current SVE and optimize	$121,475	$335,728	$457,203	5 years
Alt 3 - Excavation (vadose & saturated), Dewatering for Excavation, backfill with a layer of organic substrate	$649,971	$80,739	$730,710	5 yrs monitor
Alt 4 - Bioaugmentation and Optimized SVE	$384,052	$747,735	$1,131,788	10 yrs operation, 5 yrs monitor
Alt 5 - Soil Vapor Extraction with Six-phase Heating	$1,376,969	$80,739	$1,457,708	5 yrs monitor

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Comparative Analysis of Alternatives for Building 522

Criteria	Alt 1 No Action	Alt 2 Maintain Current SVE and Optimize	Alt 3 Excavation, Backfill with a Layer of Organic Substrate	Alt 4 Bioaugmentation and SVE	Alt 5 SVE with Six-phase Heating
Overall protection of human health and the environment	○	●	●	●	●
Attainment of media cleanup standards	○	●	●	●	●
Control of source releases	○	◐	●	◐	●
Compliance with waste management standards	○	●	●	●	●
Long-term reliability and effectiveness	○	◐	●	◐	●
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	◐	●
Short-term effectiveness	○	●	●	●	●
Implementability	●	●	●	●	●
Cost	●	◐	◐	◐	◐

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Recommended Alternative for Building 301

Alt 1 – No Action
Alt 2 – Permeable Reactive Barrier Maintenance
Alt 3 – Excavation with Organic Substrate Backfill
Alt 4 – Excavation and Bioaugmentation
Alt 5 – Soil Vapor Extraction
Alt 6 – Soil Vapor Extraction with Six-phase Heating

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Cost Summary for Building 301

Source Area Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 - No Action	$0	$0	$0	NA
Alt 2 - No further action other than maintain PRB	$0	$10,083,894	$10,083,894	150 yrs
Alt 3 - Excavation (vadose & limited saturated), Dewatering for Excavation, backfill with a layer of organic substrate, maintain PRB	$6,628,600	$5,049,744	11,678,344	75 yrs maintain PRB
Alt 4 - Bioaugmentation and Excavation maintain PRB	$3,145,899	$6,145,723	$9,291,622	75 yrs maintain PRB
Alt 5 - Soil Vapor Extraction with Water Table Depression, maintain PRB	$1,300,255	$7,383,340	$8,683,595	75 yrs maintain PRB
Alt 6 - Soil Vapor Extraction with Electrical Resistive Heating (ERH), maintain PRB	$2,010,899	$5,050,832	$7,061,731	75 yrs maintain PRB

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Comparative Analysis of Alternatives for Building 301

Criteria	Alt 1 No Action	Alt 2 No further action other than maintain PRB	Alt 3 Excavation, backfill with a layer of organic substrate, maintain PRB	Alt 4 Bioaugmentation and Excavation, maintain PRB	Alt 5 Soil Vapor Extraction, maintain PRB	Alt 6 Six-phase Heating, maintain PRB
Overall protection of human health and the environment	○	●	●	●	●	●
Attainment of media cleanup standards	○	●	●	●	●	●
Control of source releases	○	●	●	●	●	●
Compliance with waste management standards	○	●	●	●	●	●
Long-term reliability and effectiveness	○	●	●	●	◐	●
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	●	●	●
Short-term effectiveness	○	●	●	●	●	●
Implementability	●	◐	●	◐	●	●
Cost	●	○	○	◐	◐	◐

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Source Area Alternatives for Building 360 NW Corner

Alt 1 – No Action
Alt 2 – Permeable Reactive Barrier Maintenance
Alt 3 – Excavation
Alt 4 – Soil Vapor Extraction
Alt 5 – Soil Vapor Extraction with Six-phase Heating

Neathery Environmental Services

Cost Summary for Building 360 NW Corner

Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 - No Action	$0	$0	$0	0
Alt 2 - No further action other than maintain PRB	$0	$71,190,876	$71,190,876	400 yrs maintain PRB
Alt 3 - Excavation to RRS No. 2 residential	$5,680,032	$127,365	$5,807,397	5 yrs monitor after excavation
Alt 4 - Soil Vapor Extraction	$600,299	$938,974	$1,539,273	12 yrs operate SVE
Alt 5 - Electric Resistive Heating & SVE	$2,149,702	$92,053	$2,241,755	5 yrs monitor after ERH

Neathery Environmental Services

Comparative Analysis of Alternatives for Building 360 NWC

Criteria	Alt 1 No Action	Alt 2 No Further Action other than Maintain PRB	Alt 3 Excavation	Alt 4 Soil Vapor Extraction	Alt 5 Six-phase Heating
Overall protection of human health and the environment	○	●	●	●	●
Attainment of media cleanup standards	○	●	●	◐	●
Control of source releases	○	●	●	●	●
Compliance with waste management standards	○	●	●	●	●
Long-term reliability and effectiveness	○	●	●	◐	●
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	●	●
Short-term effectiveness	○	●	●	●	●
Implementability	●	●	○	●	◐
Cost	●	○	◐	◐	◐

Neathery Environmental Services

Source Area Alternatives for Building 360 Basement

Alt 1 – No Action
Alt 2 – Permeable Reactive Barrier Maintenance
Alt 3 – Bioaugmentation
Alt 4 – Soil Vapor Extraction with Six-phase Heating

Neathery Environmental Services

Cost Summary for Building 360 Basement

Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 – No Action	$0	$0	$0	NA
Alt 2 – No further action other than maintain PRB	$0	$44,796,195	$44,796,195	250 yrs maintain PRB
Alt 3 – Bioaugmentation	$247,105	$299,973	$547,078	2 yr bioaugmentation operation, 3 yrs monitor after bioaugmentation
Alt 4 – Electric Resistive Heating & SVE	$940,592	$92,053	$1,032,645	5 yrs monitor after ERH

Neathery Environmental Services

Comparative Analysis of Alternatives for Building 360 bsmt

Criteria	Alt 1 No Action	Alt 2 No Further Action other than Maintain PRB	Alt 3 Bioaugmentation	Alt 4 Six-phase Heating
Overall protection of human health and the environment	○	●	●	●
Attainment of media cleanup standards	○	●	●	●
Control of source releases	○	●	●	●
Compliance with waste management standards	○	●	●	●
Long-term reliability and effectiveness	○	●	●	●
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	●
Short-term effectiveness	○	●	●	●
Implementability	●	●	◐	◐
Cost	●	○	◐	◐

Neathery Environmental Services

Source Area Alternatives for Building 258

Alt 1 – No Action
Alt 2 – DNAPL Extraction and Groundwater Recovery
Alt 3 – Slurry Wall Repair with Limited PRB Installation
Alt 4 – DNAPL Extraction and Extracted Groundwater PRB
Alt 5 – Excavation
Alt 6 – Soil Vapor Extraction with Six-phase Heating
Alt 7 – DNAPL Extraction with Soil Vapor Extraction

Neathery Environmental Services

Cost Summary for Building 258

Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 – No Action	$0	$387,251	$387,251	0
Alt 2 – DNAPL Extraction & Groundwater Recovery	$175,152	$12,891,549	$13,066,701	100 yrs pump & treat for residual recovery
Alt 3 – Slurry Wall Repair & Limited PRBs	$1,836,195	$94,570,050	$96,406,246	1,000 yrs maintain wall
Alt 4 – DNAPL Extraction & PRB on Extracted Groundwater	$1,803,272	$11,110,183	$12,913,455	100 yrs maintain wall and pump
Alt 5 – Excavation	$12,605,967	$2,085,076	$14,691,043	5 yrs pump and treat for resident recovery
Alt 6 – Electrical Resistive Heating	$5,674,496	$5,288,118	$10,962,614	23 yrs pump and treat for residual recovery
Alt 7 – DNAPL Extraction and SVE	$528,665	$13,913,422	$14,442,087	5 yrs SVE, 100 yrs pump and treat for residual recovery

Neathery Environmental Services

Comparative Analysis of Alternatives for Building 258

Criteria	Alt 1 No Action	Alt 2 LNAPL Extraction & Groundwater Recovery	Alt 3 Slurry Wall Repair & Limited PRBs	Alt 4 DNAPL Extraction & PRB on Extracted Groundwater	Alt 5 Excavation	Alt 6 Electrical Resistive Heating	Alt 7 DNAPL Extraction and SVE
Overall protection of human health and the environment	○	●	●	●	●	●	●
Attainment of media cleanup standards	○	◐	●	◐	●	●	◐
Control of source releases	○	●	●	●	●	●	●
Compliance with waste management standards	○	●	●	●	●	●	●
Long-term reliability and effectiveness	○	●	●	●	●	●	●
Reduction in the toxicity, mobility, or volume of wastes	○	◐	●	◐	◐	●	◐
Short-term effectiveness	○	●	●	●	◐	●	●
Implementability	●	●	●	●	●	●	●
Cost	●	◐	○	◐	◐	◐	◐

Neathery Environmental Services

Source Area Alternatives for Building 348

Alt 1 – No Action
Alt 2 – Institutional Controls Only
Alt 3 – Excavation and LNAPL Pumping
Alt 4 – Soil Vapor Extraction and Passive Bailing

Neathery Environmental Services

Cost Summary for Building 348

Source Area Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 – No Action	$0	$0	$0	NA
Alt 2 – No Action with Institutional Controls (monitor GW for PCE)	$17,424	$422,895	$440,319	NA
Alt 3 – Excavation (vadose zone) & LNAPL pumping	$158,767	$1,044,120	$1,202,887	30 years LNAPL
Alt 4 – SVE and passive bailing	$68,058	$586,216	$654,273	1 year SVE and 30 years LNAPL

Neathery Environmental Services

Comparative Analysis of Alternatives for Building 348

Criteria	Alt 1 No Action	Alt 2 No Action with Institutional Controls	Alt 3 Excavation & LNAPL Pumping	Alt 4 SVE and Passive Bailing
Overall protection of human health and the environment	○	●	●	●
Attainment of media cleanup standards	○	○	●	●
Control of source releases	○	○	●	●
Compliance with waste management standards	○	○	●	●
Long-term reliability and effectiveness	○	◐	●	●
Reduction in the toxicity, mobility, or volume of wastes	○	○	●	●
Short-term effectiveness	○	●	●	●
Implementability	●	●	●	●
Cost	●	◐	○	◐

Neathery Environmental Services

Source Area Alternatives for Building 324

Alt 1 – No Action
Alt 2 – Institutional Controls Only
Alt 3 – Excavation
Alt 4 – Soil Vapor Extraction

Neathery Environmental Services

Cost Summary for Building 324

Source Area Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 – No Action	$0	$0	$0	NA
Alt 2 – No Action with Institutional Controls (monitor GW for PCE)	$24,055	$389,511	$413,566	30 years
Alt 3 – Excavation (vadose zone)	$312,239	$0	$312,239	NA
Alt 4 – Soil Vapor Extraction	$82,820	$35,440	$118,259	1 year

Neathery Environmental Services

Comparative Analysis of Alternatives for Building 324

Criteria	Alt 1 No Action	Alt 2 No Action with Institutional Controls	Alt 3 Excavation	Alt 4 SVE
Overall protection of human health and the environment	○	●	●	●
Attainment of media cleanup standards	○	○	●	●
Control of source releases	○	○	●	●
Compliance with waste management standards	○	○	●	●
Long-term reliability and effectiveness	○	◐	●	●
Reduction in the toxicity, mobility, or volume of wastes	○	○	●	●
Short-term effectiveness	○	●	●	●
Implementability	●	●	●	●
Cost	●	◐	●	●

Neathery Environmental Services

Recommended Alternative for Groundwater

Alt 1 – No Action – Cease to Operate Groundwater System
Alt 2 – Operate All Current Systems
Alt 3 – Replace Existing System with Permeable Reactive Barrier at Zones 2 & 3 Boundary
Alt 4 – Replace CS-2NB Recovery Wells with Permeable Reactive Barrier (and Chromium Bioremediation)
Alt 5 – Replace IWTP and CS-2NB Recovery Wells with Permeable Reactive Barrier

Neathery Environmental Services

Cost Summary for Groundwater

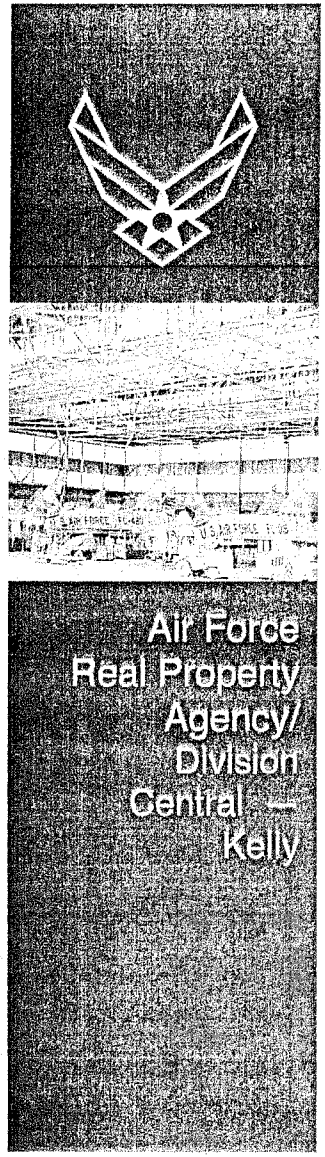
Groundwater Alternatives	Capital Cost	O&M Cost	Total	O&M Duration
Alt 1 – No Action - Cease to Operate the Groundwater Recovery System	$0	$0	$0	NA
Alt 2 – Operate All Current Systems	$0	$12,768,900	$12,087,328	20 years
Alt 3 – Replace the Existing System with PRB at Zones 2 and 3 Boundary	$2,665,108	$8,199,004	$10,323,591	25 years
Alt 4 – Replace CS-2NB Recovery Wells with PRB	$3,369,743	$8,606,003	$11,382,401	25 years
Alt 5 – Replace IWTP and CS-2NB Recovery Wells with PRBs	$4,189,134	$5,924,181	$9,631,598	25 years

Neathery Environmental Services

Comparative Analysis of Alternatives for Groundwater

Criteria	Alt 1 No Action	Alt 2 Operate All Current Systems	Alt 3 Replace the Existing System with PRB at Zones 2 and 3 boundary	Alt 4 Replace CS-2NB Recovery Wells with PRB	Alt 5 Replace IWTP and CS-2NB Recovery Wells with PRBs
Overall protection of human health and the environment	○	●	●	●	●
Attainment of media cleanup standards	○	◐	◐	◐	◐
Control of source releases	NA	NA	NA	NA	NA
Compliance with waste management standards	○	●	●	●	●
Long-term reliability and effectiveness	○	●	●	●	●
Reduction in the toxicity, mobility, or volume of wastes	○	●	●	●	●
Short-term effectiveness	○	●	●	●	●
Implementability	●	●	●	●	●
Cost	●	◐	◐	◐	◐

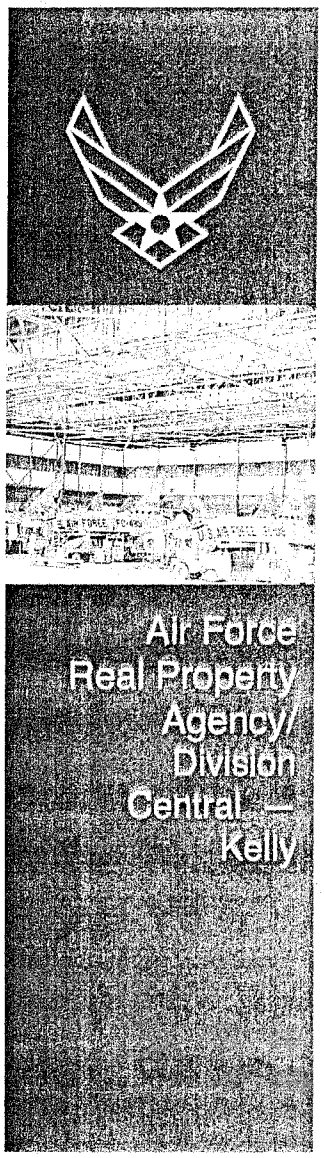
Neathery Environmental Services



Environmental
Site Cleanup

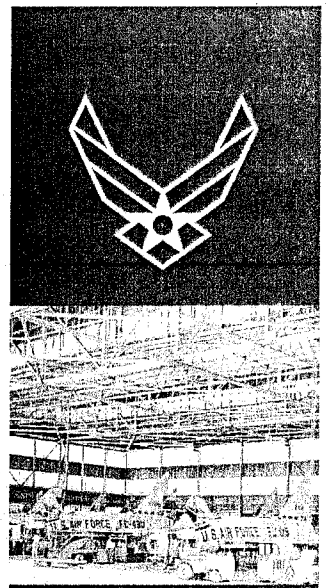
Air Force Initial Response to the Draft TAPP Review of the Zones 2/3 Corrective Measures Study by Neathery Environmental Services

Restoration Advisory Board
January 18, 2005



Environmental
Site Cleanup

- Zones 2 and 3 Corrective Measures Study (CMS) submitted to TCEQ/EPA April 2004
- The RAB selected the Zones 2 and 3 CMS for review by an independent contractor (Neathery Environmental Services) under the Technical Assistance for Public Participation (TAPP) program
- This briefing indicates our initial responses to Neathery's conclusions presented at the December TRS meeting
- We are awaiting comments on the CMS from the Texas Commission on Environmental Quality (TCEQ)

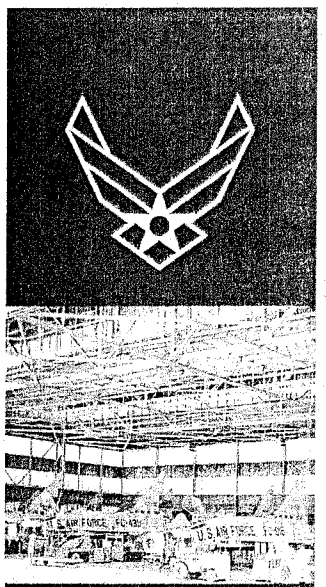


Air Force Real Property Agency/ Division Central — Kelly

Environmental Site Cleanup

Conclusion 1: "The report was well organized, written clearly and easily understood. There were no distractions caused by typographical error or production problems."

We appreciate Mr. Neathery's review and the RAB's consideration of this study.

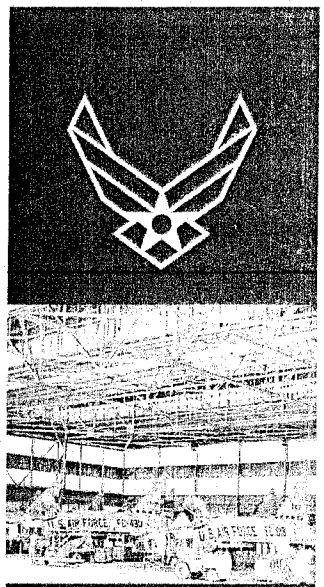


Air Force Real Property Agency/ Division Central — Kelly

Environmental Site Cleanup

Conclusion 2: "There are some technical issues that need revision or clarification."

We appreciate this suggestion, and we are reviewing the study now to see if changes are needed. When we receive comments from the Texas Commission on Environmental Quality (TCEQ) we will make any necessary changes to the study.



Air Force Real Property Agency/ Division Central – Kelly

Environmental Site Cleanup

Conclusion 3: "The recommended alternatives for some of the areas do not seem to correspond with the apparent best alternatives as presented in the tables."

We acknowledge the tables are difficult to read. At the same time, we're confident that our analysis was thorough. For this reason, we will clarify and better explain why and how we chose particular alternatives.

Proposed Meeting Agenda Items

December TRS • TAPP Review of the Zone 2/3 CMS (Mr. Neathery)	**January RAB** • Elections • Final TAPP Review of the Zone 2/3 CMS	**February TRS** • Draft TAPP Review of the ATSDR Past Air Emissions Study (Dr. Squibb, University of Maryland)	**March TRS** • Update on Building 361 • Semi-Annual Compliance Plan Report
April RAB • Update on all projects (Mr. Buelter) • KellyUSA Tour • Final TAPP (Dr. Squibb)	**May TRS**	**June TRS**	**July TRS**
August TRS	**September TRS**	**October RAB** • Tentative RAB elections	**November TRS**

Pending agenda items: 1. Alternative Water Uses

Workshop Date Vote

Please select a date below that you would be available to attend a RAB Workshop. This meeting will include topics of discussion such as the roles and responsibilities of the RAB, task committees, and leadership training.

❑ Wednesday, February 23, 2005
from 8:00 a.m. to 3:30 p.m.

OR

❑ Tuesday, February 22, 2005
from 5:30 p.m. to 9:30 p.m.
AND
Wednesday, February 23, 2005
from 5:30 p.m. to 9:00 p.m.

OR

❑ Saturday, February 19, 2005
from 8:00 a.m. to 3:30 p.m.

Outreach Activities

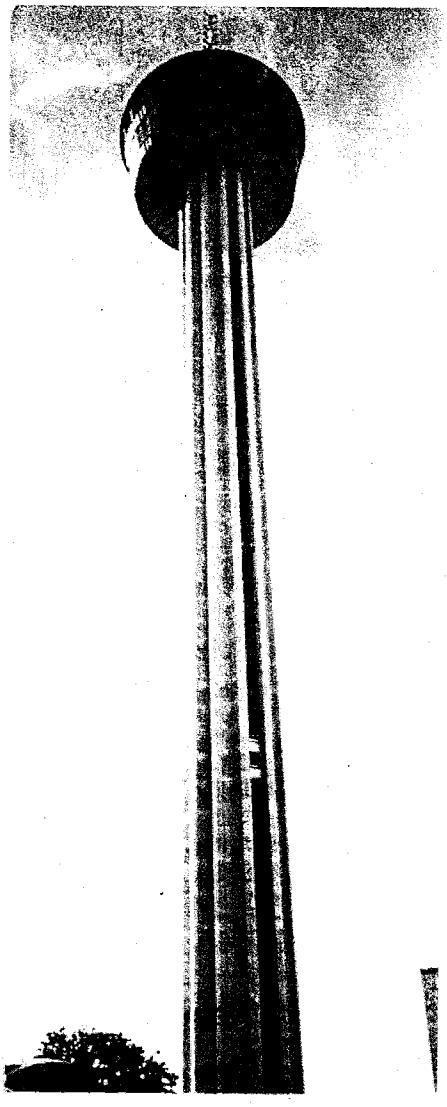
Date	Audience	Outreach Activity and Location
Tuesday, November 16	University of Texas at San Antonio	Kelly Cleanup Presentation – AFRPA Offices
Tuesday, November 30	Palo Alto College chemistry students	Tour of Groundwater Treatment Plant – former Kelly AFB
Thursday, December 02	Palo Alto College chemistry students	Tour of Groundwater Treatment Plant – former Kelly AFB

Glen Wilkenson, another former worker turned activist, witnessed and testified to several large barrels of surplus Agent Orange being buried at Kelly Air Force base in 1979, before it became privatized and open to the public. He testified before a grand jury and reported what he witnessed to several federal and state entities. No appropriate or investigative measures were taken and he was soon thereafter threatened with death if he continued to share his testimony.

Although at face value the formation of the RAB committee appears to have the interests of the community in mind, many claim it is merely a front. Its existence may appease the few individuals of the community that are aware of the contamination, but the others that attend these sessions are not comforted. Robert Silvas, Glen Wilkenson, the Southwest Worker's Union, and a small number of concerned community residents regularly attend the RAB sessions and repeatedly voice their concerns. "We are not the only ones affected," says a resident. "Our families, friends, neighbors, and even travelers who come to or through San Antonio run the risk of Agent Orange exposure. Would you wish for *your* out-of-town relatives to get cancer when they come to visit?"

For more information on the contamination in San Antonio, please visit:
www.mission-texas.com/SA

TOXIC ANTO
TOXIC SAN ANTONIO
a continuation of <u>The Killing Fields of Texas</u>
By: Iris Salinas



As the saga of *<u>The Killing Fields of Texas</u>* continues, a major twist in the story is uncovered that links the contamination from Mission, Texas to one of the largest cities in the country, San Antonio.

Word has it that Mission, Texas contracted with railroad companies like Union Pacific and the U. S. Military to create and distribute weapons of mass destruction – deadly chemicals and toxins – for decades. As you may remember, Mission is the birthplace of toxins like Agent Orange, Arsenic, DDT, Dioxin, and many others. Dioxin, which recently gained worldwide attention in the suspected poisoning and disfiguring of Ukraine's newly elected president, Viktor Yushchenko, is a bi-product of Agent Orange, which also gained worldwide attention during and long after its use in the war in Vietnam. For years, Agent Orange and several other toxins were reportedly shipped from Mission throughout Texas and other parts of the world with the help of railroad corporations like Union Pacific, the United States military, the Texas state prison system, other corporations and government entities. Former workers of the *bodegas* (chemical factories) in Mission have mentioned the transport of toxic chemicals to and through cities like Austin, College Station, and San Antonio, leaving them also contaminated.

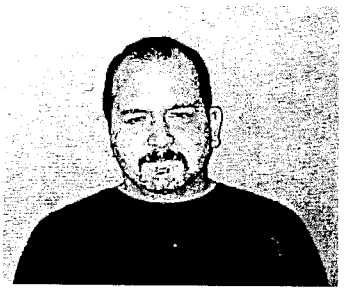
It just so happens that in San Antonio the issue of Agent Orange contamination has been one of great concern for this large city of over 1.5 million in population. Kelly Air Force Base, a closed and now privatized military base, used to be the headquarters for *Operation Ranchhand* and reportedly received and transported tons of the toxin, which is said to have contaminated anything and everything within a 20 mile radius. The regional water source for the South Central Texas region, the Edwards Aquifer, lies within these boundaries and parts of it are said to be contaminated, although no public statements have yet been made on the subject.

Operation Ranchhand was a military operation that allowed for surplus Agent Orange to be sold to the public. It began in 1973 and lasted a few short years. Any

additional surplus that was not sold was then buried in and around parts of Kelly Air Force Base as well as other military bases in San Antonio. Contamination continues to be a major concern for the city, since former base properties eventually became residential and commercial areas. A little league park was built over one known burial site on the Southwest side of San Antonio.

Community members and organizations like the Southwest Workers Union have protested and voiced their concerns to EPA, the state, the Air Force, and the city of San Antonio for some time in an effort to gain attention and action to the issue. However, thorough and appropriate community awareness and involvement projects are yet to take place. Apparently, the entities involved want to keep the story under wraps. To date, EPA has refused to label the contaminated areas as Superfund sites, although they are well aware of how contaminated the areas are. Perhaps these entities fear that a major lawsuit and mass hysteria will ensue once all the communities involved discover how dire the situation really is and how much of San Antonio is contaminated with Agent Orange.

According to the Texas Department of Health, major health problems and unusually high occurrences of cancers are common in the areas and neighborhoods surrounding the base. Many zip codes have already been listed as having "Cancer Clusters" yet officials continue to fail to address and warn the community of the situation.



Robert Silvas, a community activist and former employee of the base, agrees that the community has not been properly informed of the dangers of this situation. He is a member of the Kelly RAB Committee, a group composed of the affected community as well as of responsible parties like the Air Force and Union Pacific. It meets monthly to discuss and supposedly address the contamination issues. To date, valid community concerns regarding community involvement, notification, and health have fallen upon deaf ears and lame hands.

The issue of contamination is a very sensitive one, particularly for Union Pacific. At the November meeting, the Union Pacific Manager for Environmental Field Operations, Paul Person, publicly yelled and verbally attacked community members and activists during a community open mike period (where individual concerns of the community are supposed to be allowed.) It appears the public revelation of San Antonio's contamination is a big thorn in Union Pacific's side, since this year alone it had 5 train derailments there within weeks of each other, resulting in deadly and dangerous chemical spills. It is also one of the Defendants named in the landmark contamination case in Mission, Texas (Hidalgo County, C-4885-99) which has recently gained the attention of the United Nations, the U.S. government, and several countries around the world.

Kelly Air Force Base Restoration Advisory Board (RAB)

The Air Force invites you to attend the next RAB meeting. A variety of issues concerning the cleanup at the former Kelly Air Force Base will be discussed.

Tuesday
January 18, 2005
6:30 – 9:30 p.m.
at
Kennedy High School
1922 South General
McMullen Drive

Call the Kelly Public Information Line at (210) 925-0956 for more information.

Spanish interpreters will be available. If a sign language interpreter is needed, call (210) 925-0956 at least two days in advance.

La Junta Asesora de Restauración (RAB, por sus siglas en inglés) de la Base Aérea Kelly

La Fuerza Aérea le invita a asistir a la próxima junta de la RAB. Se discutirán una variedad de temas acerca del programa ambiental de Kelly.

Martes
18 de enero de 2005
6:30 – 9:00 p.m.
Kennedy High School
1922 S. General McMullen

Para más información, favor de llamar a la Línea de Información Pública de Kelly al (210) 925-0956.

Interpretación en español estará disponible. Si necesitará un intérprete de lenguaje de señas, por favor llame al (210) 925-0956 con al menos dos días de antelación.

Air Force Real Property Agency

Public Service Announcement

KELLY RESTORATION ADVISORY BOARD TO MEET January 18, 2005

San Antonio, Texas. – Request you air/print the following public service announcement:

The Kelly Restoration Advisory Board will meet Tuesday, January 18, 2005, at Kennedy High School, 1922 South General McMullen Drive. The meeting will be held 6:30 p.m – 9:30 p.m. The RAB is a group of community and Air Force personnel who meet quarterly to discuss the progress of the cleanup at the former Kelly Air Force Base and advise the Air Force on community concerns related to cleanup. The public is invited to attend.

####

Media Contact:
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Public Affairs Officer
Air Force Real Property Agency
143 Billy Mitchell Blvd. Suite 1
San Antonio TX 78226-1816
Phone: (210) 925-0956
Fax: (210) 925-3636
e-mail: leighann.fabianke@afrpa.pentagon.af.mil

YOUR VOICE YOUR COMMUNITY YOUR RAB!

The Kelly Restoration Advisory Board (RAB) is holding elections for community representatives January 18, 2005. RAB representatives serve as the community's voice on Kelly restoration and cleanup activities. These activities may affect your homes and businesses.

Anyone is eligible to become a RAB member. You are especially encouraged to join the Kelly RAB if you live, work, or own property in the community surrounding the former base.

Applications must be received by January 4, 2005.

For more information or to request an application packet call:

(210) 925-0956

U.S. AIR FORCE

Decoding Pollution Eaters

By Kristen Philipkoski

Story location: http://www.wired.com/news/medtech/0,1286,66188,00.html

11:00 AM Jan. 06, 2005 PT

Researchers have decoded the genome of a pollution-eating bacterium, which should make it easier for scientists to manipulate the bug into an even more efficient garbage-ingesting machine.

Researchers at The Institute for Genomic Research, known as TIGR, sequenced the 1,600 genes of *Dehalococcoides ethenogenes*. The tiny bacterium consumes chlorinated solvents used as degreasers in dry cleaning and the computer industry in the 1960s and '70s. Before anyone realized that byproducts of these chemicals could cause cancer, companies dumped the substances in landfills.

D. ethenogenes) is pretty tough to culture," said Rekha Seshadri, a microbial genomics researcher at TIGR and lead author on the research published in the Jan. 7 issue of Science. "Now you can actually see what all the different pathways are."

In 1997, Cornell University researchers described D. ethenogenes and its ability to clean up chlorinated solvents. Around that same time, DuPont researchers discovered that D. ethenogenes was present at many of their toxic sites. It turns out the bacteria likes to hang out where it can find food, that is, PCE and TCE.

That seems natural until you consider that D. ethenogenes specifically eats PCE and TCE, and the harmful compounds were introduced to the environment only about 60 years ago. The genome sequence suggests that the bacterium has evolved in response to humans dumping the chemicals, Seshadri said.

"The question then becomes, where does the ability come from if it's never seen (PCE and TCE) before?" Seshadri said. "There might have been an ancestral form that (reacted with a) more natural compound that looks very similar, and it was able to modify that ability."

Other bacteria can partially remove the pollutants, but *D. ethenogenes* is the only one known to remediate PCE and TCE completely. Scientists have already put it to work at 17 polluted sites, including Kelly Air Force Base in Texas and the Caldwell Trucking Superfund site in New Jersey.

SiRem, a company in Ontario, Canada, has capitalized on the bacterium's abilities. It introduces *D. ethenogenes* to sites in need of bioremediation. The company also offers a

David Hendricks: Inland port at KellyUSA remains distant goal

Web Posted: 01/06/2005 12:00 AM CST

San Antonio Express-News

Ever since the 1995 base realignment commission voted to close Kelly AFB's Air Logistics Center, the development of KellyUSA industrial park has been characterized by strong aerospace investments.

With Boeing and Lockheed Martin — and their partners and suppliers — leading the way, KellyUSA's available space largely has been leased near capacity for years.

But aerospace was only half the vision for the industrial park. With highway, air and rail access, the goal of an inland port busy with global warehousing and distribution was obvious. That economic development strategy remains elusive, however.

Today, KellyUSA's marketable properties are 96 percent leased, with mainly space for industrial tenants available. The Greater Kelly Development Authority continues to use lease revenues to tear down older buildings to make room for new construction.

The GKDA continues to pursue various inland port goals, new Marketing Director Jorge Canavati reported Wednesday at the monthly San Antonio Transportation Association luncheon.

Those goals include starting air cargo services, luring companies needing rail services, finding a foreign trade zone operator and strengthening or establishing relationships with the ports of Corpus Christi, Houston, Los Angeles and Long Beach, Calif.

Shifting world trade patterns involving Mexico are providing some opportunities, said Canavati, who came to GKDA in October with a decade of experience as an international business and logistics consultant.

For example, current double-stack rail service between the industrial Valley of Mexico and Laredo could be extended to San Antonio, with rail containers shifted to trucks at Laredo and driven to KellyUSA for distribution.

Legal Resources
Personals
What's Happening
TV Listings
E-cards
MARKETPLACE
Classifieds
Yellow Pages
Newspaper Ads
Video Ads
Coupons
Shopping
E-N Subscriptions
E-N Archives
E-N Store
ABOUT US
Express-News
KENS 5
MySanAntonio.com
Corrections

Another distribution opportunity is cargo arriving at Mexico's west coast port of Lázaro Cárdenas from Asia and South America bound for U.S. markets. After crossing Mexico by rail to Laredo, the cargo could be trucked to San Antonio for U.S. distribution.

The interior Mexican industrial city of San Luis Potosí is looking at San Antonio as a distribution center. Its industrial park operators will brief the Free Trade Alliance San Antonio's Logistics Task Force during a Jan. 27 meeting at KellyUSA offices.

Canavati said that if air cargo services can ever be established, Asian air cargo destined for Mexican maquiladoras could land at KellyUSA for shipment to the Mexican factories.

Air cargo remains problematic, however. With the creation of the Homeland Security Department, KellyUSA will need a federal inspection station. GKDA leaders soon will sit down with Homeland Security officials to determine the security needs for such a station.

"Without that facility, we are wasting our time" pursuing international cargo, whether arriving by air, road or rail, Canavati said.

Another barrier is the absence of a second runway. The existing runway is long enough for any cargo aircraft in the world, but air cargo companies prefer landing sites with alternative runways in case accidents close the main one.

Canavati said a second KellyUSA runway is planned, "but that is years away."

To attract cargo, KellyUSA is building a 320,000-square-foot center alongside the runway that will be flexible between office and warehousing space.

With recent industrial tenants Gore Design Completions, which refurbishes aircraft with custom interiors, and Triple S Steel, a steel distributor, KellyUSA's total employment now sits at about 12,900.

The original goal, established in 1995, was 21,000 jobs by 2006. Many people have forgotten that as the 10-year anniversary of the Kelly closing decision nears.

GKDA hasn't abandoned that goal, but it no longer wishes to achieve that number with jobs of any kind. Instead, the authority is focusing on tenants that make sense for KellyUSA.

Even if only a portion of the inland port opportunities materializes, that 21,000-job goal will be attainable not many years later, if not by 2006.

Much work remains, as Canavati stressed, to overcome the barriers.

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MaconTelegraph.com

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A KELLY COMEBACK: No 'Taps' for base as a recovery plan takes hold

By Gene Rector
Telegraph Staff Writer

SAN ANTONIO - When the BRAC commission selected Kelly Air Force Base for closure in 1995, the San Antonio media said the news struck like the sharp crack of "Reveille" on a quiet morning.

The Air Force's oldest, continuously active installation - with roots back to 1916 - was to be history in six years, along with 20,000 jobs and about $2.5 billion in economic impact.

Kelly was one of two Air Force depots trimmed during the 1995 BRAC. The other was in Sacramento, Calif. Both were similar in size and scope to the depot complex at Robins Air Force Base.

The BRAC decision closed the logistics center at Kelly and realigned other parts of the base. Robins, along with depots in Utah and Oklahoma, dodged the closure bullet that year and now comprise the Air Force's three remaining logistics centers as BRAC 2005 approaches.

Kelly's recovery plan - now nine years in the making - is not a perfect blueprint for Middle Georgia should a 2005 closure decision strike Robins. After all, San Antonio is the nation's eighth-largest city with far more options and recourses.

But Kelly's massive office, warehouse, airfield and industrial infrastructure is very similar to Robins, and San Antonio's marketing plan for those facilities is a useful primer should the unthinkable strike in Middle Georgia.

Now it's Kelly USA

Bruce Miller wasn't in San Antonio to hear the news that July 1995 day. He was working in Ohio. But the architect and commercial real estate expert now has the job of making sure "Reveille" does not lead to "Taps" for the once-massive industrial complex.

Miller is chief executive officer both for Kelly USA - the new name for Kelly AFB - and the Greater Kelly Redevelopment Authority, the agency created by the city of San Antonio to lead the recovery process. So far, he and his predecessors can point to a number of successes.

About 75 commercial companies now occupy existing or new structures on the almost 2,000-acre tract that includes Kelly's 11,500-foot runway. The job base exceeds 12,000, the maintenance ramps and hangars hum with aircraft and engine work, and the economic impact has returned to pre-closure levels. Miller said only about 300 people lost their jobs after the thousands who retired or transferred to other federal locations are factored in.

"Kelly is doing pretty well," Miller concedes. "Some things could be better and we've got a lot of things to build, but it's on its way. Certainly the worst - the loss of 20,000 jobs - has not happened."

Miller oversees a three-phase recovery plan.

In phase one, the Air Force transferred 14 million square feet of facilities spread over 600 buildings. About 9 million square feet were marketable and more than 90 percent of the usable space has been leased to such aerospace tenants as Boeing, Pratt & Whitney and Lockheed Martin. A number of non-aerospace agencies also have moved to the complex.

About $27 million in city, state and federal investments have been used to attract $164 million in private funds for new construction and improvements to existing buildings.

Phases two and three call for additional construction, the continued buildup of aerospace repair and overhaul workloads

and the positioning of Kelly USA to become an "internal port" - a transportation hub for shipping, particularly for commodities flowing to and from Central and South America.

"Rail lines from Long Beach (Calif.) to the East Coast and from Canada to Mexico cross near Kelly," said Miller. "That, coupled with our air cargo capability, builds vast potential for an internal port. Few locations in the United States have similar potential. There is huge demand for sourcing by truck and rail, then shipping by air. If you manufacture or assemble components, you want to be in that location."

Getting recognized as an internal port is not easy.

"To be a player you have to be in business for some time and the growth is slow," Miller said. "We have to build an air cargo terminal and a full-service inspection station. That's a very expensive undertaking and we'll stage our improvements based on what we start to see in the market. Right now, the market seems to be perishables and possibly livestock from South America. There's also a lot of trade out of China."

Miller believes phase two will create another 6,400 jobs at Kelly and bump economic impact to $4.3 billion. "We hope to have the airport open by the second or third quarter of 2005," he said. "We are already doing rail demonstrations and something could happen there in six to nine months."

Boeing is big

One of the cornerstones of Kelly's renaissance has been Boeing. The defense giant employs almost 2,000 people at the San Antonio site, performing maintenance and upgrades on three Air Force aircraft - the C-17 airlifter and two tankers, the KC-135 and KC-10.

David Bouse, Boeing's director of aerospace support at Kelly, said a number of factors convinced the company to locate workload for three new Air Force contracts at the former depot.

"First, it was the facilities," he said. "Kelly has the world's largest free-standing hangar. There are no obstructions and we can run aircraft from one end to the other. It has the capacity for up to 23 wide-bodies and that was a big draw for us. They also had a paint/depaint facility, backshops, plus a tremendous amount of ramp space."

But Bouse said cooperation and enthusiasm from the community really sealed the deal.

"It was astounding," he said. "If I was downtown and told someone I was from Boeing, people would ask what they could do to help us, to make us successful."

He remembers a 1998 job fair on a weekend that saw 18 inches of rain fall on the city. "The whole place was flooded," he said. "People waded across trenches filled with 4 to 5 feet of water to get to job interviews. It was astounding. People were excited and looking for the opportunity."

Facilities were also a major draw for Pratt & Whitney, a major manufacturer and repair source for aircraft engines. The United Technologies company is repairing F100 engines at some of the same facilities once used by the Air Force. Kelly had been one of the Air Force's two engine repair centers before its closure. The F100 powers the Air Force's F-15 and F-16 fighters.

"The facility here is very good for the disassembly, inspection and reassembly work that we do," said Phil Gallimore, Pratt's operations manager. "There are also tons of warehouse space to store our parts."

About 200 people work for the company at Kelly and at a sheet metal operation in another part of town. Mike Ramsower, the San Antonio general manager for Pratt, appreciates the cooperation the company has received from Kelly USA.

"They're very motivated to help us grow and be successful," he said, "so that's definitely a benefit to being in San Antonio."

Another benefit is co-location with other defense and commercial contractors. "That means we can leverage the synergies between the companies - the airframe, engine, the maintenance and repair people," Ramsower said. "It's a good way to go. It's the wave of the future. We're looking to partner not only with the Air Force but also with local industries."

Alex Camacho has nothing to do with the aerospace industry, but he's also glad to be at Kelly. The California native is project director for ACS, a company providing collection services for the state of Texas. ACS is a multinational company

headquartered in Dallas.

"We had about 60 employees back in July of 2000 and we're up to 220," he said. "We tend to locate where our customer wants, but the state government here was very helpful. They wanted us to locate at Kelly and they've been very supportive."

Camacho said ACS has hired only a few former Kelly employees because his work force tends to be younger. But he is pleased with their productivity.

"I've worked at six other locations and this is the best work ethic I've found," he said. "These people work hard. In fact, ACS is developing some new businesses and they plan to locate them here."

Cities can recover from base closure

Bouse said cities can recover from a base closure, even one the magnitude of Kelly.

"First of all, it's not a case where someone turns off a light switch and 15,000 workers are out the door next week. It takes a long time to close down a base, particularly a depot," he said. "The Kelly closure took six years, and that offers a lengthy process to see what you can do to redevelop the base."

He said local planning and cooperation are key. "The city and the community have to decide what businesses they can attract," Bouse said. "Maybe aviation is not the best choice. Maybe you can attract something different."

Ramsower agreed that people were surprised and shocked when the closure was announced. "But after the initial surprise, people started looking at it and began to see that it could be a good thing for San Antonio," he said. "Of course, you never know what decisions will come out of BRAC, but you have to run with it and it's worked out pretty well here."

He believes Kelly USA will be stronger than Kelly AFB - at least in the long term.

"There are aerospace as well as other companies here," said Ramsower. "There's also a lot of hard work going on and a good game plan. The solutions are not short term. They're long term, but it can be done."

Miller shares that optimism. He doesn't believe "Taps" will be playing over the Kelly landscape any time soon, although he says any recovery plan generates its share of turf battles and second thoughts.

"It's a tough road to go down," he said. "There will be a lot of problems, and you have to be creative and stick with it. But there is life after BRAC."

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LAST IN A SERIES: Theories on base's closure could help Robins survive

By Gene Rector
Telegraph Staff Writer

SAN ANTONIO - The BRAC 1995 decision to close the San Antonio Air Logistics Center still strikes a tender nerve for many people who poured out all or part of their professional lives here.

Virtually everyone agrees that the shock was palpable that July 13 afternoon when the news was announced. Some of the former workers offer theories on why it happened - why the ax fell on Kelly Air Force Base and not on three surviving Air Force depots in Georgia, Utah and Oklahoma. Those theories may be useful to Robins Air Force Base supporters as BRAC 2005 approaches.

The Kelly alumni disagree on closure impacts, despite significant progress in redeveloping the former Air Force facility.

The San Antonio center - very similar to Robins in scope and size - was a massive operation with more than 15,000 civilian and about 5,000 military jobs when the closure announcement hit. It was the largest employer in what is now the nation's eighth largest city with a 1995 payroll of about $700 million and an economic impact of $2.5 billion.

Kelly managed and maintained the C-5 cargo aircraft, T-37 and T-38 trainers and more than half of the Air Force's engines, including the F100 power plant for the F-15 and F-16 fighters. The center also was responsible for nuclear ordnance, aerospace fuels used by the Air Force and NASA, and more than 240,000 supply items for units around the world.

Don Lee invested 40 years of his life at Kelly, becoming the center's ranking civilian employee before he retired in 1988. He believes Kelly was caught in a political trap. "I think it involved some trade-offs that came down at the last minute," he said.

Lee believes changes in the way the Air Force rated its depots were also a factor. "The rating changes took place a few months before the BRAC decision," he said. "Kelly went from number two among the five logistics centers to number four. So, Kelly became vulnerable when they closed two logistics centers."

The Air Force depot in Sacramento, Calif., also was selected for closure by the 1995 BRAC commission.

Phil Ferro, a retired Air Force colonel now working for a defense contractor in San Antonio, thought the base's heavy concentration of Hispanic employees would make a difference.

"Kelly was the largest single employer of Hispanics in the Defense Department, so I never thought it would be closed," he said.

But that was not enough to sway the decision. "The Air Force had another engine repair facility at Oklahoma City, and of course Kelly's airframe work could be done anyplace. So they decided they didn't need Kelly," he said.

Retired Air Force Cols. John Rushfeldt and John Dinsmore think the closure decision was at least aided - if not driven - by other factors.

Worker complaints

Rushfeldt, who headed quality assurance at Kelly until he retired in 1984, believes worker complaints and related impacts on productivity were conclusive.

"The performance just wasn't what it should have been," he said. "So, the Kelly thing was not a surprise if you had been

around the operation for a good long time and were attentive to what was going on. The work force was the most complaining in the Air Force with all sorts of lawsuits. That kind of stuff drained off an awful lot of energy."

He said the indicators were evident well before the final decision was made. "Like most people who had been in the Air Force a long time, I had a number of contacts," Rushfeldt said. "I talked to people at the Pentagon and at AFMC headquarters, and the thinking people saw it coming." AFMC is Air Force Materiel Command, the parent agency for all Air Force depots, including Robins.

Dinsmore, who retired from Kelly in 1985 as one of its key directors, agrees that worker complaints were an issue. "It had become a thorn in the side of AFMC, and I really believe that was the driving force that caused the command to say, 'Let's not fight for Kelly,' " he said. "They did not encourage the Kelly closure, but they did not have another good way to deal with the complaints, so they just didn't put up a strong battle."

Robins had its own labor and productivity concerns two years ago when the local depot led AFMC in worker grievances. Maj. Gen. Donald Wetekam, the center commander at the time, said conditions were troubling. "It (worker grievances) indicates turmoil in the work centers. It makes us less effective and robs us of our ability to perform our mission," he said during a November 2002 presentation to the work force.

In May 2003, base and American Federation of Government Employees Local 987 officials signed a partnership agreement to focus on settling labor disputes informally and at the lowest possible level. Local 987 is the bargaining unit for most civilian workers at Robins. Both base and union officials say there has been a significant decline in formal complaints.

Dinsmore believes the complaints issue may have painted a skewed and unfortunate picture of the Kelly work force.

"My experience with Kelly employees was outstanding," he said. "I thought we had a hard-working work force, particularly during Desert Storm and such incidents as Panama and Grenada. They supported a lot of activities and they did it in a good way."

He also believes Kelly may have been more honest in reporting various productivity and efficiency factors to AFMC. The data created a type of depot report card and was used to rank the centers.

"That's just a hunch I have," Dinsmore said. "I think they (Kelly) told the truth. They didn't try to gild the lily. They may have been more honest than the other air logistics centers."

David Mann said the closure news took the wind completely out of him. "It was like a death in the family," he said.

The C-5 aircraft production crew chief transferred to Robins in 1997 after more than 16 years at the San Antonio facility. "I just had too much time to throw it away," Mann said. He believes worker complaints played a role along with politics.

"It was about what state or region had the most political power and who owed whom favors," he said. "It's not always about what's best for the taxpayer or national defense, although I would like to think that's part of it."

Rose Tristan doesn't have theories on why Kelly closed. She just knows that the BRAC decision left her with a huge dilemma - either transfer to Oklahoma City or accept a severance package. She accepted severance in July 2000 despite having more than 20 years of civil service. Kelly's closure process required six years and was not fully completed until July 2001.

"I didn't want to go to Oklahoma City, so I had to find another job," said the single mother of a now-17-year-old daughter.

The news was shocking. "I felt sadness. I felt loss - loss of a very good, secure job," she said. "I was used to the lifestyle. I thought I was going to retire from Kelly."

She knew she had to make changes before closure was final. "So I started paying off as many debts as I could," Tristan said, "and I changed my lifestyle. I also prayed and tried to be strong."

Recovery plan took hold

Those prayers were answered as the city's recovery plan for Kelly began to take shape. Tristan found a job with ACS, a Dallas, Texas, firm that moved one of its subsidiaries to the base.

"I grew up in San Antonio," she said. "My daughter and I had many friends here. I just left it up to God and he said stay."

Tristan worked her last day for the Air Force on a July 2000 Friday and began working for ACS the following Monday. "I didn't even take a break," she said. "God closed one door then opened another one."

Tristan's story has been duplicated numerous times as the Greater Kelly Redevelopment Authority - the agency created by the city to spearhead the recovery - has attracted some 75 large and small companies to the Kelly facility.

The Air Force turned over more than 9 million square feet of marketable office and aircraft maintenance space and almost 2,000 acres to the local community.

GKRA officials say the job base now exceeds 12,000 and Kelly's economic impact has returned to 1995 levels. Despite that success, the experience still draws mixed reviews from the Kelly alumni.

Jim Martin, who retired from Kelly in 1992 after a 30-year civil service career, is the most positive. "In the long run, closure was probably the best thing for San Antonio," he said. "They have a lot of plans for that facility and I think they will materialize."

Ferro doesn't think the city has skipped a beat. "I think we're close to recovering the salaries and now we have diversification. Every month you hear about someone else moving out there."

Dinsmore said the city doesn't seem to be hurting, but he still gets nostalgic when he revisits the base. "It's like a ghost town compared to what it once was," he said.

The city will eventually recover, believes Rushfeldt. "It was a little slow getting started, but the redevelopment seems to be going reasonably well," he said. "In the long run, I think it was the right call. There was always that shadow hanging over us that something could be cut."

Mann believes closure was best for San Antonio but not for the Air Force. "It was best for the city because of the potential for economic development," he said. "But the Air Force is suffering from the closure of Kelly and Sacramento. We're struggling with the workloads that transferred. We're still feeling the ill effects."

Lee emphatically disagrees with the "best for San Antonio" conclusion. "I think it was a mistake to close Kelly and I think history will bear that out," he said. "Closing it will not be good for San Antonio in the long run. I don't share that rationalization. I don't think any area is better off losing a facility like this. In fact, it wouldn't surprise me to see it up and functioning again some time in the future."

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Midstate economy could lose Robins' $4 billion impact if BRAC designates base for closure

ROBINS AIR FORCE BASE - Local defense experts say they have an edgy, sweaty-palm optimism that Robins Air Force Base and the Warner Robins Air Logistics Center will not only survive, they'll thrive as a result of BRAC 2005, the federal process for closing military installations or impacting workload.

Whether that optimism is well-founded remains to be seen. But whatever plays out in the next few months, Middle Georgia has a huge stake in the outcome.

The base accounted for $4.1 billion in economic impact last year, including $1.2 billion in salaries, $240 million in expenditures, an estimated $2.26 billion in indirect job creation and $445 million in federal retiree pensions. The base also issued contracts valued at $3.7 billion, including $135 million to Middle Georgia firms.

Although Houston and Bibb counties reap the greatest share of the economic impact, counties as distant as Jasper, Upson, Crisp and Telfair also have people working at the giant installation.

Four previous BRAC rounds have padlocked 97 U.S. bases and realigned 57. Pentagon officials say the 2005 process will do much more - close or realign about 100 bases and help transform and reshape the military to meet the challenges of the 21st century.

The Department of Defense will announce in about five months which bases it wants to close. By the time the process concludes late next year, regions similar to Middle Georgia will know whether they face explosive growth or the need for dramatic economic restructuring.

The upside could be dramatic; the downside could be devastating, though perhaps not as dire as some could imagine.

Many areas have fared reasonably well following a BRAC closure, including two cities that lost Air Force air logistics centers as a result of BRAC 1995. Both bases were similar to Robins in size and scope.

San Antonio, Texas, home of now-closed San Antonio Air Logistics Center, has regained many of the jobs and virtually all of the economic impact after a nine-year redevelopment process, said Bruce Miller, CEO of Kelly USA. Sacramento, Calif., home of the now-closed McClellan Air Force Base, has replaced 8,500 of 13,500 jobs lost from the base's closure, according to a recent Sacramento Bee article. Within 20 years, Sacramento County expects 35,000 jobs to

populate the industrial park created from the base.

A Defense Department report released in March said 75 areas adversely impacted by previous major BRAC actions are demonstrating "a measure of relative progress." The report said more than 70 percent of 130,000 lost defense jobs had been replaced and "new civilian jobs on former bases have increased steadily at an average annual rate of 7 percent for the past three years."

However, many of the areas that have fared well after a base closing are markedly different from Middle Georgia. Some are urban centers with huge populations and a number of growth options - starkly different from more rural locations, like Middle Georgia, with economies expressly tied to the military.

For that reason, Ron Smith is apprehensive about next year's BRAC process - not because he believes Robins is likely to close, but because the economic stakes are so high.

"I've always had a level of anxiety about BRAC 2005," admitted the retired Air Force major general. "But that's based on the fact that it's going to happen. I have an extreme level of confidence as I look at what Robins and the community have to offer."

Smith is a consultant to the 21st Century Partnership, a local group of political, business and civic leaders focused on supporting and promoting Robins, its assigned units and the Middle Georgia area. The former Warner Robins Air Logistics Center commander added that he was not overconfident.

"When you look at what other bases and communities have to offer, it just makes you want to work harder and harder to tell our story," Smith said.

The closure and realignment decisions - likely to be finalized by September - will hinge on three factors, according to criteria published by the Pentagon: the infrastructure needed by the Defense Department, long-term force structure needs and overall military value.

Over the past three years, partnership members have patrolled the halls of Congress, the Pentagon and Air Force Materiel Command headquarters in Ohio, buttonholing key decision makers and telling a positive story about Robins and its ability to accept new missions and more people.

Their story has had a number of selling points:

- A vast, 8,700-acre base that already hosts a multiservice, multimission defense community.

- A highly trained government and contractor work force of some 24,000 federal and private employees.

- A sophisticated industrial complex providing worldwide management and maintenance on an array of aircraft and components.

- A total of 14 million square feet of facilities with a replacement value of almost $5 billion.

- Continued modernization and expansion of that military infrastructure.

- Close proximity to other service installations and military training ranges.

- A community with a 60-year track record of supporting Robins, its people and its missions.

Partnership director Ron Carbon said the Pentagon is saying very little about the coming BRAC, although a great deal is happening behind the scenes.

"They're starting to draft their initial scenarios and weighing the pros and cons," he said.

The Pentagon must identify its closure and realignment selections by May 16. That will trigger an almost four-month review by a nine-member BRAC commission before final recommendations are sent to President Bush by Sept. 8.

All military depots scrutinized

The 19 defense depots - including Air Force centers at Robins, Tinker Air Force Base, Okla., and Hill Air Force Base, Utah - are likely to receive intense scrutiny with overall efficiency, productivity and ability to accept joint service missions being key factors.

Retired Air Force Maj. Gen. Rick Goddard, also a former Warner Robins Air Logistics Center commander, thinks the three Air Force depots will fare very well.

"During the 1995 BRAC, we carved out two Air Force depots, and it's unlikely that they will carve out more this time," he said. "I just don't believe the Air Force can operate successfully with less than three full-up depots."

All three surviving Air Force depots are full of work, Goddard said, and are performing specialized tasks. "Ogden (Utah) has all the landing gears, missiles and some fighter work," he said. "Robins does fighter and cargo aircraft work. Oklahoma City does engine and big airplane work. I just don't see that any one depot could pick up the workload from another," he said.

He does expect some depot consolidations among branches of the military.

"But I believe Air Force depots are more efficient than some of the other service depots," he said. "We can handle workload from the other services. In fact, we've done some of that already, such as C-130 work for the Coast Guard and Marines."

Smith said he would be "totally shocked" if depot work consolidation does not occur, though he's also convinced that the three Air Force depots will fare well.

"When you look at what the three centers have to offer in terms of joint interservice sustainment, it's incredible," Smith said. "When you look at size, technology, flexibility, public/private partnership capabilities ... I have a lot of optimism. ... What we have to offer is extremely strong."

He's especially sold on Robins' position in the joint arena - its ability to train and operate with

other military services.

"BRAC 2005 is going to do more than whack down installations to achieve cost savings," Smith said. "It will transform the way we base our forces and train in the U.S."

Robins' location an asset

The 116th Air Control Wing at Robins - the Air Force's only Joint STARS ground surveillance system - is a prime example, Smith says.

"We have Fort Stewart (near Savannah) and Benning (in Columbus) right down the road," he said. "They need Joint STARS training. Our Joint STARS wing needs Army-on-the-ground training. And the beautiful thing is they can train jointly during the day and be home with their families at night. They won't have to deploy to train."

Training ranges on the East and Gulf coasts further embellish the picture.

"You could put Air Force units in here to go train with the Army, Navy and special operations forces. That's why I'm so optimistic about a place like Robins," Smith said.

Goddard says the unpredictable nature of the war on terror attaches even greater value to Robins and the depot system.

"We need to be prepared for war regardless of the political, economic and social condition of the day," he said. "If we haven't prepared our support structure to do that, we lose. That's why depots make so much sense. The environment can be different day to day - very unpredictable. But our ability to wage war when the time comes must be very predictable."

The 21st Century Partnership has taken a "Why not Robins?" approach to marketing the base.

"We have a 12,000-foot runway. We can put new flying and ground missions in here. We have new facilities. We have a great community," Smith said. "That's what we've been telling every decision maker who will listen. When the planners are trying to decide where to put a new unit or mission, we want them to think: 'Why not Robins?' "

All the data show the military value of Robins is very strong, according to Carbon.

"So, we believe we're in line to gain additional missions," he said. "But we're not complacent. Just because the facts say we should gain missions doesn't mean there's no chance we could close. Our bottom line is: Don't get complacent. Make sure the Pentagon knows we're here 100 percent."

To prepare for the unthinkable - a closure of Robins - the partnership and the Middle Georgia Regional Development Center are putting together a redevelopment plan that will have three aspects, according to Carbon.

"One part is an outline for transferring the Robins real estate from the federal government to a local entity," he said. "The other parts deal with redeveloping the facility and diversifying the

economy." A $175,000 grant from the U.S. Office of Economic Adjustment is funding the project.

Meanwhile, however, Smith said the partnership plans to keep telling its story.

"If you look at the bases closed in the four previous BRACs, every one of them had an 'Oh, my gosh, I can't believe it happened' moment. People will have the same reaction to BRAC 2005," he predicts. "But I hope the Robins comment will be, 'Oh, my gosh, we're really going to gain a lot of missions.' "

Project Regeneration Update

By Jill JohnstonSouthwest Workers' Union

Visit the Southwest Workers' Union website at

Readers of Touching Bases will remember previous articles about "Project Regeneration," a community-based strategy for the future of the Greater Kelly Air Force Base area.

Project Regeneration is a new strategy launched by Southwest Workers' Union and the Committee for Environmental Justice Action after the official closing of Kelly Air Force Base in July 2001. Seventy years of activities at KAFB poisoned the shallow groundwater under 30,000 residential homes and left the people and workers burdened with multiple illnesses. The project is a collaborative problem-solving approach to empower residents to achieve justice in three areas of concern identified by the community: (1) environmental cleanup; (2) environmental health; and (3) community economic revitalization.

Current Reality

Despite the façade and public image that the Air Force portrays, the community remains contaminated and sick. Meanwhile the EPA (Environmental Protection Agency) and the TCEQ (Texas Commission on Environmental Quality), who are in charge of the oversight of the cleanup, continue to fail in protecting people of color and poor communities from environmental toxins and pollutants. To date there is: (1) NO cleanup for the community; no cleanup of the shallow groundwater, soil or Leon Creek, where fish contain cancer-causing toxins; (2) NO recognition of the responsibility for the health problems the residents and workers face NOR any type of comprehensive health care; (3) Billions of tax-payer dollars going into KellyUSA and corporate welfare while there is NO revitalization for the community.

Community Five-Year Vision

In July 2003, CEJA leaders created a consensus five-year vision as the basis of a Plan del Pueblo (People's Plan). The eleven points of the vision are: The Community is Empowered; Environmental, Health & Economic Decisions Made by the Local Community in Partnership with CEJA; Individual Scientists in Partnership with Community; Total Cleanup of Kelly Community; Industrial Contamination Prevention; Community Emergency Plan Enforced; More Accessible Community Health Services; Our Community Beautified & Improved; Quality Economic Development; Neighborhood Family Recreation Facilities; Compensation for Kelly Community.

'Plan del Pueblo'

As a means to expand community empowerment, SWU-CEJA is formulating a 'Plan del Pueblo,' which will be a comprehensive document that includes the vision of the community with the technical expertise of independent scientists to lay out a five year plan around the three strategic areas: environmental cleanup,

environmental health and community revitalization. The partnership between independent scientists, experts and the community is called the Work Teams. The Work Teams, one for each of the strategic areas, met here last September and March of this year to begin developing the community plan. The teams will develop both alternative and additional plans to what already exists to ensure healthy, empowered communities. In addition, the community is educating and launching outreach and mobilization in the three neighborhoods of North Kelly Gardens, East Kelly and South Kelly.

As part of the community strategy, leaders from CEJA are going door-to-door in their neighborhood to ask their neighbors about the health of the members of their households, focusing on cancer, tumors and other serious illnesses. Purple crosses are being placed in front of households that have a survivor or someone who has passed away from cancer. Unfortunately, crosses are starting to line the streets of the Kelly community, which provides a stark visual reality as to the health problems these residents face.

Multi-stakeholder Roundtable Model

Secondly, SWU-CEJA is engaging with other relevant state, local and federal agencies to bring everyone to the table with the community in order to push to adopt and implement the 'Plan del Pueblo.' This multi-stakeholder process is based on the reality that there are many agencies involved, the communication is poor and it is impossible for the community to be in every one of their spaces. As a nationally-designated EPA Interagency Working Group site, SWU-CEJA is working to develop a successful model that brings community voices into the decision-making process and can be used in other communities. Vieques, a small island of the mainland of Puerto Rico that has been used as a U.S. Navy bombing site for decades, invited SWU to share the Project Regeneration model with the community that has just ousted the military from their home. SWU helped to lead a community vision summit last February. The intention is to develop the 'Kelly Consensus,' an agreement between all the agencies and the community around environmental cleanup, health and community revitalization, where the community sits as equals to decide its own future.

Model of Empowerment

Project Regeneration is an organic learning process for both SWU and the community. The available models around federal facilities – which benefit from extensive exemptions and influence – are very limited. Ultimately, Project Regeneration is a model to empower affected communities to be able to sit as equals at the decision-making table, a space from which the community here and communities globally are continually excluded. It is about facilitating a mechanism for community self-determination, not merely accepting a token advisory position or acting as a rubber stamp for agency bureaucracy.

Study doesn't clear Kelly air

Web Posted: 10/23/2004 12:00 AM CDT

Jerry Needham
Express-News Staff Writer

Federal health officials said Friday that a study of past air emissions at the former Kelly AFB has not ruled out the possibility that neighbors suffered health problems from chemicals and fuels used at the base.

The health consultation by the Agency for Toxic Substances and Disease Registry on past air emissions at the base was released Friday for public comment until Nov. 30.

It concludes that off-base exposures to the levels of individual contaminants from both industrial and aircraft operations would not present any health hazards. The agency estimated levels of emissions from Air Force records.

Data were insufficient to tell if there were problems with chromium emissions from plating operations before 1980 or from an incinerator that burned cyanide waste for about a year.

Although the individual chemicals analyzed for the study showed there should be no ill effects on neighbors' health, David Fowler, one of the two authors, said there's uncertainty on the cumulative effect of exposure to a chemical mix.

Benzene and butadiene — components of jet fuel — "individually, you wouldn't consider them a problem," he said. "We don't know when you put them together. What we recommended was to further look into the health outcomes to see if we can determine if it was environmental exposures that led to the outcomes or not."

Previous studies found elevated levels of some kinds of leukemias and cancers in ZIP codes around Kelly.

Another division of the agency already is comparing the types of diseases that would be expected from exposures to combinations of the chemicals to the actual numbers found in the area, said Fowler, an Atlanta-based toxicologist who was reached by telephone.

"I'm glad they're doing this," said Yolanda Johnson, a Kelly neighbor with health trouble. "The fact is there are a lot of sick people around here."

The report is available for public review at the Kennedy High School Library, Pan American Library, Las Palmas Library and Memorial Library.

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jneedham@express-news.net

Air not cleared in study of Kelly base

By Edmond Ortiz
Staff Writer

Federal officials examining environmental effects of the former Kelly Air Force Base said it is possible residents in surrounding neighborhoods have suffered health problems from aerial pollutants disbursed by the military complex. However, more comprehensive information and research are necessary for definitive conclusions.

The Agency for Toxic Substances and Disease Registry released its health consultation report Oct. 22 for a public review and comment period that runs through Nov. 30. This consultation, the eighth investigation that ATSDR has conducted into possible exposure and health effects from environmental contamination, reached four conclusions:

■ Aircraft emissions of JP-4 jet fuel were unlikely to have resulted in off-base exposures to individual chemical levels that would cause harmful health effects;

■ Insufficient data were available to determine the health hazard of exposure to hexavalent chromium emissions. Off-base exposures to estimated sources are unlikely to have caused adverse health effects;

■ Off-base exposure to chemical mixtures from stationary and aircraft sources is an indeterminate health hazard because of the scientific uncertainty of potential interactions from exposure to chemical mixtures; and

■ Data were not available to ATSDR to evaluate potential exposure to emissions from incineration of cyanide wastes or to unburned, airborne aircraft fuel emissions.

The public health consultation is available for review at the following libraries: Kennedy High School, Pan American, Las Palmas and Memorial.

Comments must be made in writing to Chief of Information; ATSDR; 1600 Clifton Road, N.E. (MS E-60); Atlanta, GA 30333.

10/28/97 Express-News

ATSDR
AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY

ATSDR MEDIA ANNOUNCEMENT

ATSDR Releases for Public Review and Comment the Kelly AFB Public Health Consultation About Past Air Emissions

Public Comment Deadline is Nov. 30, 2004

For Immediate Release: October 22, 2004

ATLANTA - The public comment period for the just released Kelly Air Force Base (AFB) public health consultation about off-base air emissions runs through Nov. 30, 2004. The report was issued by the Agency for Toxic Substances and Disease Registry (ATSDR), a federal public health agency.

The health consultation is the eighth ATSDR investigation into possible exposure and health effects from environmental contamination related to the former Air Force base. The health consultation has four conclusions:
— Air dispersion modeling indicates that aircraft emissions of JP-4 jet fuel were unlikely to have resulted in off-base exposures to individual chemicals at levels that would cause harmful health effects.
— Insufficient data were available to determine the health hazard of exposure to hexavalent chromium air emissions. Off-base exposures to estimated individual contaminant levels of other chemicals emitted from stationary sources are unlikely to have caused adverse health effects.
— Off-base exposure to chemical mixtures from stationary and aircraft sources is an indeterminate health hazard because of the scientific uncertainty of potential interactions from exposure to chemical mixtures.
— Data were not available for ATSDR to evaluate potential exposure to emissions from incineration of cyanide wastes or to unburned, airborne aircraft fuel emissions (misting).

The public health consultation is available for review in San Antonio at

John F. Kennedy High School Library
1922 S. General McMullen

Pan American Library
1122 W. Pyron

Las Palmas Library
515 Castroville Road

Memorial Library
3222 Culebra

The public comment period extends through Nov. 30, 2004. Comments on the public health consultation must be made in writing. Mail comments to
Chief, Information Services Branch
ATSDR
1600 Clifton Road, N.E. (MS E-60)
Atlanta, GA 30333

Comments received during the public comment period will be logged in to the ATSDR administrative record for this health consultation. Comments received, without the names of individuals who submitted them, and ATSDR responses to the comments will appear in an appendix to the final public health consultation. Names of those who submit comments, however, will be subject to release for requests made under the U.S. Freedom of Information Act.

For more information, community members can contact Environmental Health Scientist Susan Moore or Health Communication Specialist Maria Teran-MacIver, toll free, at 1-888-422-8737. Senior Regional Representative George Pettigrew also may be contacted at 214-665-8361. Callers should refer to the Kelly Air Force Base site in San Antonio, Texas.

ATSDR, a federal public health agency of the U.S. Department of Health and Human Services, evaluates the human health effects of exposure to hazardous substances.

Established by Congress in 1980 under the Superfund law, ATSDR conducts public health assessments at each of the sites on the EPA National Priorities List, as well as other sites when petitioned.

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Members of the news media can request an interview with ATSDR staff by calling the ATSDR Office of Communication at 404-498-0070.

Back to ATSDR Home page

Updated by R. Searfoss October 28, 2004
For more information, contact ATSDR at:
1-888-422-8737 or e-mail (public inquiries)
404-498-0080 or e-mail (news media)

KELLY AIR FORCE BASE

HEALTH INFORMATION UPDATE

JANUARY 18, 2005

Agency for Toxic Substances and Disease Registry (ATSDR) Open House

- ATSDR hosted an Open House Tuesday, December 14 from 4:00 - 8:00 p.m. at Kennedy High School. Staff members from Metro Health, Texas Department of State Health Services, and ATSDR were present to answer questions about the Kelly AFB Public Health Consultation about Past Air Emissions.

KELLY AIR FORCE BASE

RAB UPDATE – ENVIRONMENTAL PROJECTS

JANUARY 18, 2005

Zone 4 Permeable Reactive Barriers (PRB)

- Commercial Street: All PRB injection wells were installed by September 30, 2004. The injection of zero valent iron mixture was completed November 11, 2004. Removal of the injection wells will begin upon completion of injection and the area's surface restored including repaving by March 31, 2005.

- 34th Street Extension: All PRB injection wells were installed by September 10, 2004. The injection of zero valent iron mixture was completed October 29, 2004. Removal of the injection wells will begin upon completion of injection and the area's surface restored including repaving by March 31, 2005.

- Malone/Culberson: An access agreement with the Union Pacific Railroad is being worked. Schedule for installation of the PRB will be developed when the access agreement has been signed by the AF and UPRR.

Zone 2 Remedial Actions

- PRB/slurry wall: Installation of the 900 foot zero valent iron PRB and 700 foot slurry wall are complete. The first round of groundwater samples were taken on January 5, 2005. The monitoring wells will be included in the April – June 2005 semi-annual compliance monitoring event. A letter will be sent to the TCEQ requesting if AFRPA can shut off the CS-2 North Bank Groundwater Recovery system prior to the April – June 2005 monitoring event to determine if the PRB is successfully working. Successful performance of the PRB will allow the AF to turn off the CS-2 North Bank system currently used to pump and treat the contaminated groundwater from Zones 2 and 3.

- Site E-1 Soil Removal: Removal of contaminated soil from Site E-1 is 70% complete. Estimated completion of removal and site restoration is mid-February, 2005. Emulsified vegetable oil continues to be added to the bottom of the excavation to activate the native microbes at the site to further degrade contamination in soil and groundwater. The groundwater collection trench installed at the site in 2003 will continue to operate until remedial action goals are met.

- Site D-10 Soil Removal: Excavation of Site D-10 is complete. Site restoration activities will continue until the end of January 2005. A closure report will be prepared for submittal to the TCEQ and EPA Region 6 for review.

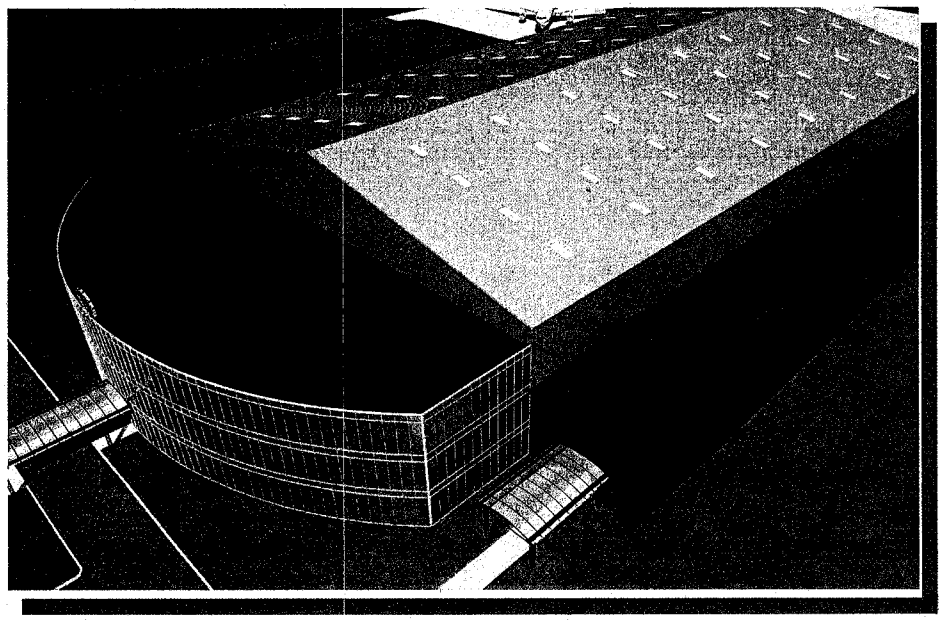
San Antonio Transportation Association

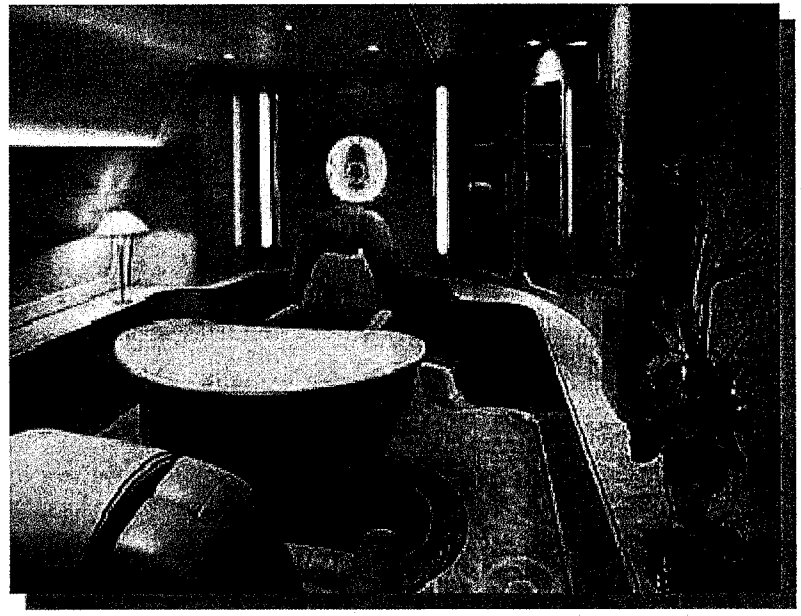
January 5th, 2005

Jorge Canavati
Director of Marketing
Greater Kelly Development Authority

Gore Design Completions, Ltd.

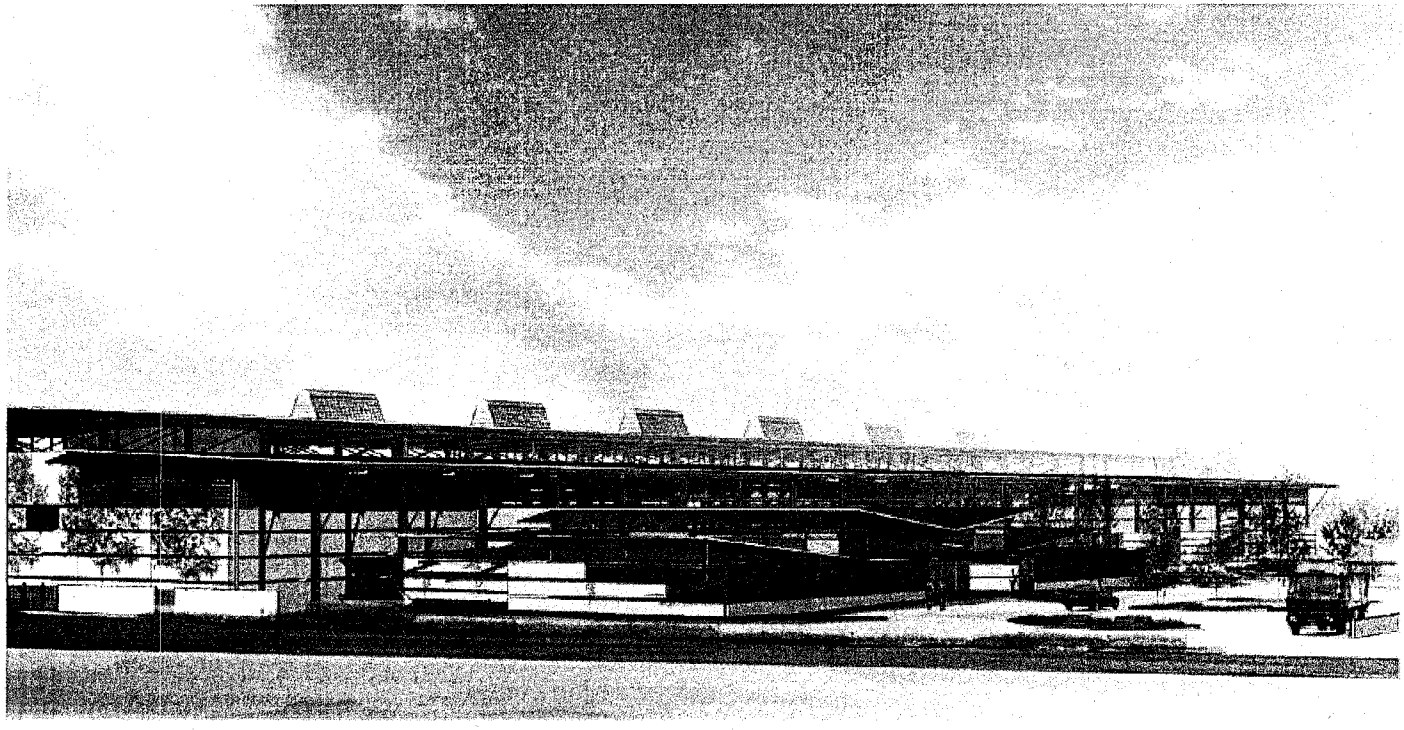
- 120,000 Square foot Hangar, Office & Manufacturing Space on 9.8 Acres
- $13MM Design / Build Project
- Largest Single Finish Center in North America





Triple S Steel

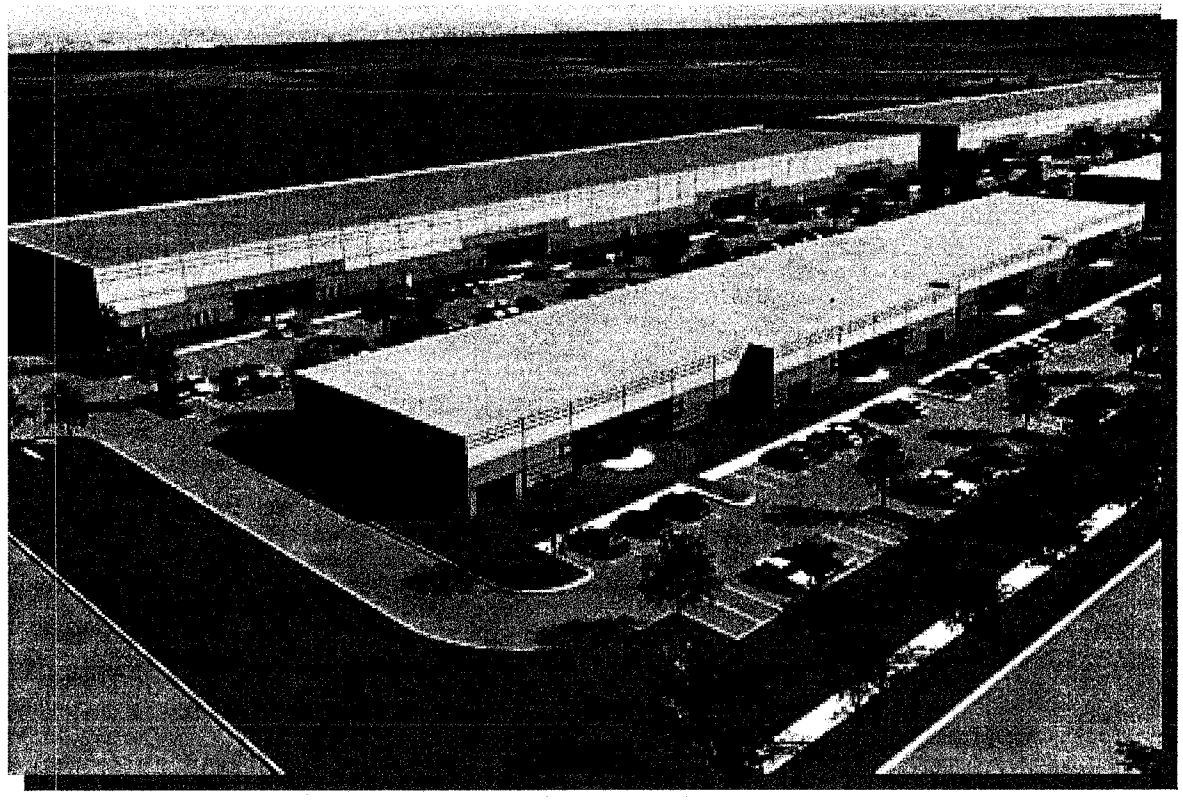
- 204,230 Square Foot Steel Distribution Center on 13.8 Acres
- One of the Largest Independent Structural Steel Distributors in Texas
- $8 MM project



TRIPLE S STEEL DISTRIBUTION FACILITY--KELLY USA LAKE/FLATO ARCHITECTS--HOSKINS CONTRACTING

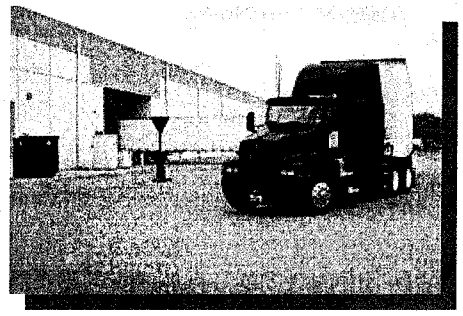
New Office Flex & Warehouse

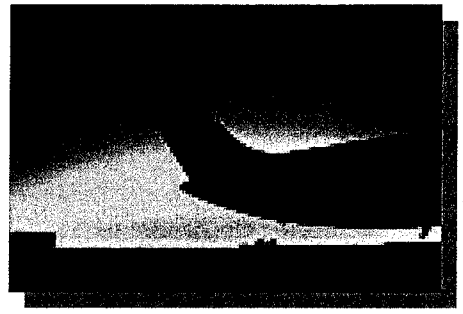
- 26.6 Acre Planned Site With Over 320,000 Square Feet of Facilities
- Building 1, 2, and 3 Available Spring 2005
- Tenant Allowance Available

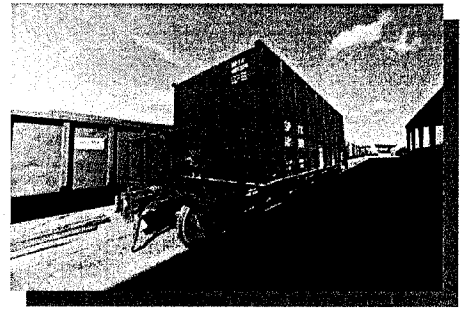


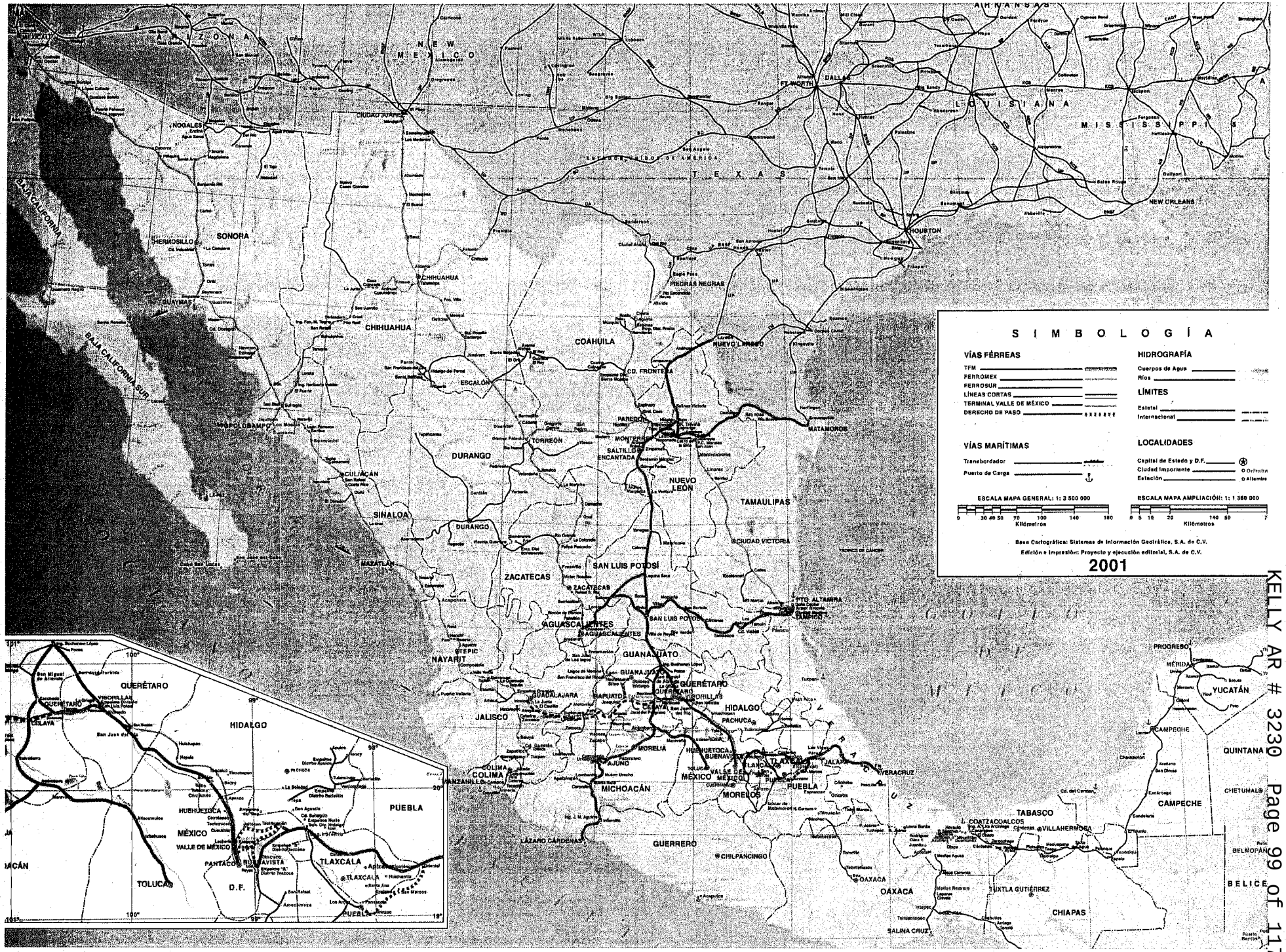
Future Goals

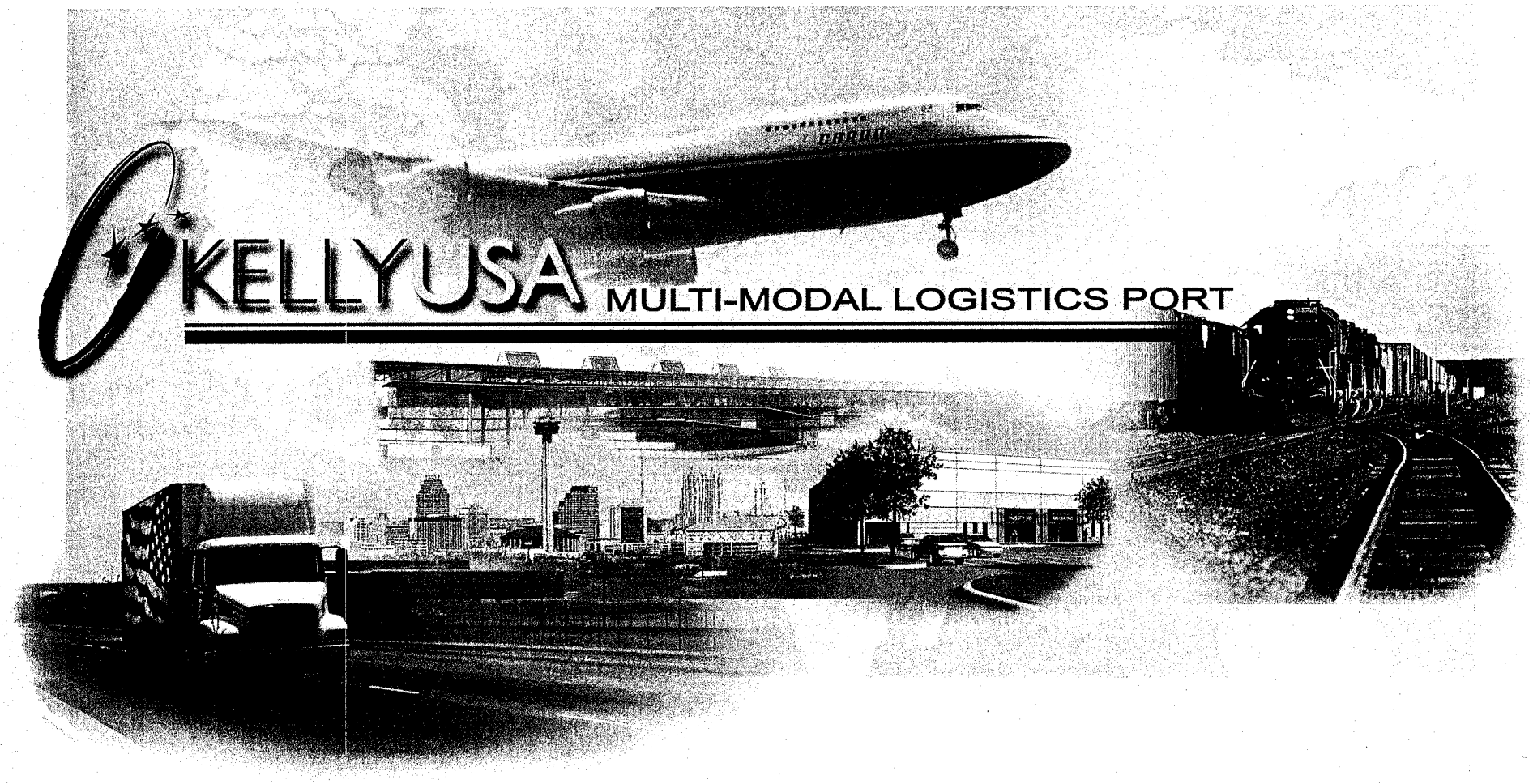
- Opening of Kelly Field for International Air Cargo
- Opening of Kelly Rail Port for Direct International Rail and Inland Port Distribution with Port of Corpus Christi, Port of Houston, Port of L.A. Long Beach
- Evolution of KellyUSA into a Major Port with International Cargo Trade Generated via Direct Air, Rail and Sea
- Activation and Use of Foreign Trade Zone











San Antonio Transportation Association

January 5th, 2005

DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

7 December 2004

Ms. Sonja S. Coderre
Public Affairs Officer
143 Billy Mitchell Blvd Ste 1
San Antonio TX 78226-1816

Dear

Thank you for attending the 9 November 2004, Restoration Advisory Board (RAB) meeting. This letter is in response to your request for information on the cost and status of Kelly AFB cleanup projects during 2004 and those projected for 2005 as well as when the Agent Orange issue will be "put to bed."

Cleanup projects for 2004 and 2005 are listed in the table below. The projects for 2004 have been or will be completed by the end of the year; however, some of the contracts listed below are still open for maintenance and monitoring purposes.

Project Title	Project Cost	Estimated Completion
Corrective Measures Implementation (CMI) PRB System Install/Data Collection, Phases 1 & 2	$ 3,957,445	30-Sep-04
Environmental Process Control Facility (EPCF) Demolition	$ 685,136	29-Oct-04
CMI Zones 2 & 3 Sites E-1 and D-10	$ 3,457,591	29-Oct-04
Zones 2/3 Solid Waste Management Units (SWMUs) CMI (Bldg 301 and Bldg 385 Areas)	$ 2,563,543	30-Nov-04
Bldg 326 Remediation of Interior and Exterior Sanitary Sewer	$ 1,430,817	31-Dec-04
Zones 2 & 3 IRP CMI Permeable Reactive Barrier (PRB)	$ 5,253,731	31-Dec-04
PRB Installation at Zone 4 Commercial St. Area, Sections 1 & 2 and Zone 5, 34th St. Extension, Section 3	$ 5,797,245	31-Dec-04
Stepwise Industrial Waste Collection System (IWCS) Abandonment	$ 69,210	31-Dec-04
SWMU Closure (construction is complete, waiting on final report)	$ 548,690	31-Dec-04

Project Title	Project Cost	Estimated Completion
Underground Storage Tank (UST)/Aboveground Storage Tank (AST) Removal and Closure	$ 248,512	31-Dec-04
WP021 (E-1) Soil and Groundwater CMI	$ 4,956,747	31-Dec-04
Commercial St. Repairs/Environmental Services	$ 394,971	31-Dec-05
Tiers 2/3 Ecological Risk Assessment	$ 267,029	31-Mar-05
Installation Restoration Program (IRP) Groundwater Corrective Measure Implementation, SS037, WP021, PRB Construction	$ 3,642,250	31-Aug-05
34th St. PRB Construction (construction was completed in 2004; the contract is up in 2006 to allow for maintenance)	$ 889,500	30-Jun-06
TOTAL	$ 34,162,417	

The Agent Orange issue draws a lot of attention from certain community members. The Air Force cannot stop these individuals from speaking on this topic during public meetings. As an active member of the RAB, you have the ability to help the community focus on issues pertinent to the Kelly AFB cleanup. I urge you to take an active position on this matter and work with other members of the RAB to bring closure to this issue.

If you have any questions or comments, please call me at 210-925-0956.

Sincerely,

SONJA S. CODERRE

October 24, 2004

Armando c. Quintanilla
Alternate RAB Member
70 Bristol Green
San Antonio, Texas 78209-1899

Office of the Under Secretary of Defense
Deputy under Secretary of Defense
(Environmental Security)
3000 Defense Pentagon
Washington D. D. 20301-3000

Dear Deputy Under Secretary of Defense,

For the past eight years, Air Force officials of the former Kelly Air Force base, have been extracting contaminated ground water, treating it until restored and then dumping it into Leon Creek. This restored ground water ends up in the Gulf of Mexico. This is a waste of our tax dollars and valuable water.

Air Force records indicated that over three billion gallons of restored water has been wasted by the Air Force. The cleaning of Kelly contamination is about 50% completed and it is estimated that the extraction of ground water will continue for 5 to 15 years.

The ground water had it not been contaminated by the Air Force, could be used as a drinking water source in case of a severe drought.

As a matter of information, the Air force contaminated a ten square mile area which consists of 18,000 homes which are 90% Hispanic. This contaminated water is under their homes, schools, streets and churches. The ground water was contaminated by jet fuel spills, toxic solvents and chemicals.

In this regard, I am requesting that the Department of Defense conduct a study on this waste of water and tax dollars. I am also requesting that the Air Force stop wasting the restored water by storing it in tanks at Kelly or re-injecting it into the ground. Please Respond.

Sincerely,

Armando C. Quintanilla

DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

13 Jan 05

MEMORANDUM FOR KELLY RESTORATION ADVISORY BOARD

FROM: Ms. Sonja S. Coderre
Public Affairs Officer
143 Billy Mitchell Blvd Ste 1
San Antonio TX 78226-1816

SUBJECT: Forwarded Letters from Mr. Armando Quintanilla to Kelly RAB Members

1. At the request of Mr. Armando Quintanilla, Kelly RAB members are being sent a copy of correspondence between Mr. Quintanilla and the Under Secretary of Defense (24 Oct 04) as well as a letter from AFRPA to Mr. Quintanilla (15 Dec 04). The letter from AFRPA mentions the RAB Executive Committee; therefore, Mr. Quintanilla is requesting this letter be sent to you.

2. If you have any questions or comments, please call me at 210-925-0956.

Sincerely

SONJA S. CODERRE

Attachments:
1. Correspondence between Mr. Quintanilla and the Under Secretary of Defense (24 Oct 04)
2. Letter from AFRPA to Mr. Quintanilla (15 Dec 04)

DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

DEC 15 2004

AFRPA/DR
1700 North Moore Street Suite 2300
Arlington, VA 22209-2802

Armando C. Quintanilla
70 Bristol Green
San Antonio, TX 78209-1899

Dear Mr. Quintanilla

Thank you for your letter of October 24, 2004, to the Office of the Under Secretary of Defense for Environmental Security, requesting that a study be conducted on the potential for water-reuse at the former Kelly Air Force Base (AFB). We are pleased to inform you that the Restoration Advisory Board (RAB) Executive Committee and the Air Force, agreed to seek assistance and input from area water agencies on potential reuse of treated groundwater.

The cleanup at the former Kelly AFB began in 1982 under the Installation Restoration Program. The pump-and-treat system began operation in 1993 and is designed to reduce contamination in the shallow groundwater aquifer. This aquifer is not a source of drinking water for the Kelly area. The pump-and-treat system collects groundwater through a series of extraction wells and pumps it to a groundwater treatment plant. After this treated water meets all regulatory requirements for discharge, it is released into Leon Creek, Six Mile Creek, or made available for reuse.

The Air Force continues its commitment to innovative strategies that will reduce water usage at our San Antonio installations. In 1995, Kelly AFB was permitted by the State of Texas to reuse treated groundwater for irrigation of the golf course to reduce demand on the Edwards Aquifer. The golf course is located on the portion of the former Kelly AFB that was realigned to Lackland AFB. AFRPA is working with the Texas Commission for Environmental Quality to expand approval for application of reuse water.

We thank you for your ongoing commitment to the Kelly RAB. We look forward to working with the RAB, water purveyors, appropriate regulatory agencies, and concerned community members on the potential reuse of treated groundwater at the former Kelly AFB.

Sincerely

KATHRYN M. HALVORSON
Acting Director

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 31, 2004

Ms. Norma Landez
BRAC Environmental Coordinator
AFRPA/DK
143 Billy Mitchell, Suite 1
Kelly AFB, TX 78226-1816

Re: Closure/Remediation - Risk Reduction Standard No. 2
Acceptance of Deed Certification and Release From Post-closure Care Responsibilities
Kelly Air Force Base (Kelly AFB)
Solid Waste Registration No. 31750
EPA ID No. TX2571724333
Permit and Compliance Plan HW/CP - 50310
Building 58 Former Entomology Shop; Building 351 Locations of Concern;
and Building 1534 Battery Wash Rack

Dear Ms. Landez:

The Texas Commission on Environmental Quality (TCEQ) received a letter submitted by the Air Force Real Property Agency (AFRPA) dated October 13, 2004 containing deed certifications for the Building 58 Former Entomology Shop, Building 351 Locations of Concern, and Building 1534 Battery Wash Rack. The certifications state that contaminants remaining at the above listed sites have been remediated to meet residential soil criteria under Risk Reduction Standard (RRS) No. 2 pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapters A and S.

In order to attain RRS No. 2, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to health based standards and criteria. Contaminants allowed to remain in place in media of concern (i.e., soil, ground water, surface water and air) must not exceed the health based clean up levels as specified in 30 TAC §335.556. A Final Report, documenting that remediation of the above listed sites has attained RRS No. 2 such that no post-closure care or engineering or institutional control measures are required, was previously accepted by the TCEQ in our letter dated February 24, 2004.

After review of the proof of deed certifications, it appears that the deed certification requirements of 30 TAC §335.560(b) and (c) have been completed. The TCEQ hereby releases AFRPA from post-closure care responsibilities for the Building 58 Former Entomology Shop, Building 351 Locations of Concern, and Building 1534 Battery Wash Rack.

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual remediation fails to comply with these requirements, the burden remains upon AFRPA to take any necessary and authorized action to correct such conditions. A TCEQ field inspector may review your Final Report and conduct a closure inspection of the site.

Questions concerning this letter should be directed to me at (512) 239-2360. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section at Mail Code MC-127 with an additional copy submitted to the TCEQ Region 13 Office in San Antonio. The TCEQ Solid Waste Registration Number should be referenced in all submittals.

Sincerely,

Mark A. Weegar

Mark A. Weegar, P.G., Senior Project Manager
Team II, Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

MW/mw

cc: Mr. Gary Miller, U.S. EPA Region 6, Dallas (6F-NB)
Mr. Robert Silvas, Interim Community Co-chair, Kelly AFB RAB, San Antonio
Ms. Abbi Power, TCEQ Region 13, San Antonio (MC-R13)
TCEQ Registration and Reporting Division (MC-129)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 30, 2004

Ms. Norma Landez
BRAC Environmental Coordinator
AFRPA/DK
143 Billy Mitchell, Suite 1
Kelly AFB, TX 78226-1816

Re: Closure/Remediation - Risk Reduction Standard No. 2
Acceptance of Deed Certification and Release From Post-closure Care Responsibilities
Kelly Air Force Base (Kelly AFB)
Solid Waste Registration No. 31750
EPA ID No. TX2571724333
Permit and Compliance Plan HW/CP - 50310
Building 1655 Waste Tanks (NoR Unit No. 047)

Dear Ms. Landez:

The Texas Commission on Environmental Quality (TCEQ) received a letter submitted by the Air Force Real Property Agency (AFRPA) dated October 13, 2004 containing proof of deed certification for the Building 1655 Waste Tanks (NoR Unit No. 047). The certification states that contaminants remaining at the site have been remediated to meet non-residential (i.e., industrial/commercial) soil criteria under Risk Reduction Standard (RRS) No. 2 pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapters A and S.

In order to attain RRS No. 2, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to health based standards and criteria. Contaminants allowed to remain in place in media of concern (i.e., soil, ground water, surface water and air) must not exceed the health based clean up levels as specified in 30 TAC §335.556. A Final Report, documenting that remediation at the facility has attained RRS No. 2 such that no post-closure care or engineering or institutional control measures are required, was previously accepted by the TCEQ in our letter dated November 6, 2003.

After review of the proof of deed certification, it appears that the deed certification requirements of 30 TAC §335.560(b) and (c) have been completed. The TCEQ hereby releases AFRPA from post-closure care responsibilities for the Building 1655 Waste Tanks (NoR Unit No. 047).

The Corrective Action Section is forwarding a copy of this letter to the TCEQ's Registration and Reporting Section to update your Notice of Registration (NOR).

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare as required by 30 TAC §335.4. If the actual remediation fails to comply with these requirements, the burden remains upon AFRPA to take any necessary and authorized action to correct such conditions. A TCEQ field inspector may review your Final Report and conduct a closure inspection of the site.

Questions concerning this letter should be directed to me at (512) 239-2360. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section at Mail Code MC-127 with an additional copy submitted to the TCEQ Region 13 Office in San Antonio. The TCEQ Solid Waste Registration Number should be referenced in all submittals.

Sincerely,

Mark A. Weegar

Mark A. Weegar, P.G., Senior Project Manager
Team II, Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

MW/mw

cc: Mr. Gary Miller, U.S. EPA Region 6, Dallas (6F-NB)
Mr. Robert Silvas, Interim Community Co-chair, Kelly AFB RAB, San Antonio
Ms. Abbi Power, TCEQ Region 13, San Antonio (MC-R13)
TCEQ Registration and Reporting Division (MC-129)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 23, 2004

Ms. Norma Landez
BRAC Environmental Coordinator
AFRPA/DK
143 Billy Mitchell Blvd., Suite 1
San Antonio, TX 78226-1816

Re: Review of the following AFRPA's documents:
Response to TCEQ letter dated July 22, 2004, dated August 9, 2004
Revision to August 9, 2004 Response, dated October 28, 2004
Zone 2, Site SD-2 and Former Sludge Dewatering Facility (Six Sites Closure)
Kelly Air Force Base (Kelly AFB)
Solid Waste Registration No. 31750
EPA ID No. TX2571724333
Permit and Compliance Plan HW/CP - 50310

Dear Ms. Landez:

The Texas Commission on Environmental Quality (TCEQ) has completed our review of the above referenced AFRPA response dated August 9, 2004, and subsequent revision dated October 28, 2004, submitted in response to TCEQ and United States Environmental Protection Agency (EPA) comments dated July 22, 2004 and June 30, 2004, respectively. The July 22, 2004 TCEQ letter was issued based on review of AFRPA's *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*, dated March 23, 2004. The March 23, 2004 AFRPA revised report was submitted to support the closure of contamination associated with Site SD-2 and the Former Sludge Dewatering Facility in accordance with the requirements of TCEQ Risk Reduction Standards (RRS) pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335, Subchapters A and S. In order to attain RRS No. 2, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to health based standards and criteria as specified in 30 TAC §335.556. The TCEQ understands that groundwater contamination identified in the area of SD-2 and the Former Sludge Dewatering Facility will be addressed by the remedial alternatives proposed in the Zone 2 and 3 Corrective Measures Study (CMS) Report.

Based upon the information contained in the August 9, 2004 response and subsequent revision dated October 28, 2004, it appears that AFRPA has provided sufficient information to document that releases to soil from SD-2 and the Former Sludge Dewatering Facility have attained RRS No. 2 such that no post-closure care or engineering or institutional control measures are required. The TCEQ understands that the soil contamination associated with SD-2 and the Former Sludge Dewatering Facility will be deed recorded in conjunction with the closure of adjacent SWMUs referenced in Section 12 of the November 2002 report.

The TCEQ cannot issue a final closure determination for contamination associated with SD-2 until the ecological evaluation has been completed. Site SD-2 was included for evaluation in the Final Tier 2/Tier 3 Ecological Risk Assessment (ERA). AFRPA is currently developing a response to TCEQ comments to the Final Tier 2/Tier 3 ERA. In addition, Site SD-2 is a solid waste management unit (SWMU) listed in Section I.C.2.h of the compliance plan; therefore, please note that in order to comply with TCEQ Corrective Action Section policy requirements associated with the corrective action program (effective August 1, 2001), the TCEQ cannot issue a final closure determination until the public has had an opportunity to comment on the proposed corrective measure to address the contamination associated with SD-2 (i.e., deed notification). Please note that the ecological evaluation must be completed and any outstanding issues resolved prior to implementing public notice procedures. Public notice procedures/requirements for SD-2 will be provided to AFRPA upon completion of review of the final ecological evaluation.

An original and one copy of future correspondence associated with this issue should be submitted to the TCEQ Corrective Action Section at the letterhead address using Mail Code MC-127. The facility name, location and identification number(s) in the TCEQ reference line above should be included with the submittal. A copy should also be submitted to Ms. Abbi Power, TCEQ Region 13 Office in San Antonio. Should you need additional information, or wish to discuss this issue further, please contact Ms. Eleanor Wehner at (512) 239-2358 or via e-mail at ewehner@tceq.state.tx.us.

Sincerely,

Mark A. Weegar, P.G., Project Manager
Team II, Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

EW/ew

cc: Mr. Gary Miller, U.S. EPA Region 6, Dallas (6F-NB)
Mr. Robert Silvas, Interim Kelly RAB Citizen Co-Chair, San Antonio
Ms. Eleanor Wehner, TCEQ, CAS (MC-127)
Ms. Abbi Power, TCEQ Region 13, San Antonio (MC-R13)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 30, 2004

Ms. Norma Landez
BRAC Environmental Coordinator
AFRPA/DK
143 Billy Mitchell Blvd., Suite 1
San Antonio, TX 78226-1816

Re: *Final East Kelly Solid Waste Management Unit and Data Gap Additional Investigation at the Former Kelly AFB, Texas, June 2003*
Kelly Air Force Base (Kelly AFB)
Solid Waste Registration No. 31750
EPA ID No. TX2571724333
Permit and Compliance Plan HW/CP - 50310
Approval - Risk Reduction Standard No. 2
Notice of Deficiency - Facility 3060 Warehouse, and Facility 3774 Former Auto Repair Shop

Dear Ms. Landez:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced report (Closure Report) dated June 2003 and received by the TCEQ on July 3, 2003. In addition, the TCEQ also reviewed comments received from EPA Region 6 dated September 2, 2003. According to the Closure Report, the following seven solid waste management units (SWMUs) were investigated to determine whether the SWMUs could be closed pursuant to Title 30 Texas Administrative Code (TAC) Chapter 335 Subchapters A and S, Risk Reduction Standards (RRS) No. 1 or No. 2:

- Facility 3060 Warehouse
- Facility 3451 Calibration Fluid Pumps
- Facility 3752 Former Auto Repair Shop
- Facility 3772 Former Administrative Building
- Facility 3774 Former Auto Repair Shop
- Facility 3780 Former Auto Repair Shop
- Lot 55 Transformer Storage Yard

Closure under 30 TAC §335.555 RRS No. 2 Closure/Remediation to Health-Based Standards and Criteria - According to the Closure Report, the closure of the following SWMUs have attained closure under RRS No. 2, such that no post-closure care or engineering or institutional control measures are required:

- Facility 3451 Calibration Fluid Pumps
- Facility 3752 Former Auto Repair Shop
- Facility 3772 Former Administrative Building
- Facility 3780 Former Auto Repair Shop
- Lot 55 Transformer Storage Yard

In order to attain RRS No. 2, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to health based standards and criteria. Contaminants allowed to remain in place in media of concern (i.e., soil, ground water, surface water and air) must not exceed the health based clean up levels as specified in 30 TAC §335.556.

Based upon the information contained in the Closure Report and other information available to staff, it appears that the closures have achieved RRS No. 2. As specified in §335.560, AFRPA must submit proof of deed certification to the TCEQ within ninety (90) days from the date of this letter. Upon acceptance of the proof of deed certification, the TCEQ will transmit a final letter releasing AFRPA from post-closure care responsibilities.

Notice of Deficiency - Closure under 30 TAC §335.555 RRS No. 2 Closure/Remediation to Health-Based Standards and Criteria - According to the Closure Report, the closures of the following SWMUs also attained closure under RRS No. 2, such that no post-closure care or engineering or institutional control measures are required:

- Facility 3060 Warehouse
- Facility 3774 Former Auto Repair Shop

Based upon our review of the Closure Report, the TCEQ cannot approve of the closure of the above listed SWMUs at this time. **Please provide a written response to the following deficiencies:**

1. Facility 3060 Warehouse - According to Section 2.3.17 Septic Tanks, a sealed floor drain or sump was observed during the visual site inspection (VSI) conducted inside Facility 3060 and there are no records to indicate the past use of this sump. The sump is clearly visible in Photo 5 and appears to have been covered with wood planks. Given this facility's past use for aircraft maintenance and engine repair, please explain why no attempt was made to investigate this sump area.

2. Facility 3774 Former Auto Repair Shop - Section 6.1 Property Description, indicates that a vehicle washrack was previously located inside Facility 3774 and that this washrack drained to a sump. This sump was unplugged at the time of the VSI and was covered with plywood

"to prevent petroleum odors from escaping into the work space area". This sump is shown in Photos 3 and 4. The fact that the sump had to be covered to prevent petroleum odors from escaping into the work space clearly suggests that solid waste remains in this unit and that decontamination and properly closure of this unit is required. Please explain why this sump was not included as part of the investigation of Facility 3774 and what actions will be taken to address the decontamination/closure of this unit.

Your response to the above noted deficiencies must be submitted within 60 days of receipt of this letter using mail code number MC-127. A copy of your response should also be submitted to Ms. Abbi Power, TCEQ Region 13 Office in San Antonio. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section. The TCEQ Solid Waste Registration Number and Unit Name should be referenced in all submittals

Should you need additional information, or wish to discuss these comments or the due date, please contact me at (512) 239-2360 or via email at mweegar@tceq.state.tx.us. Thank you for your cooperation in this matter.

Sincerely,

Mark A. Weegar

Mark A. Weegar, P.G., Senior Project Manager
Team II, Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

MW:mw

cc: Mr. Gary Miller, EPA Region 6, Dallas (6PD-F)
Mr. Robert Silvas, Interim Community Co-chair, Kelly AFB RAB, San Antonio
Ms. Abigail Power, TCEQ, Field Operations Region 13, San Antonio (MC-R13)

Request for Information

If you would like to submit a request for information, please fill out the contact information below and write your request in the space provided.

Your response will be mailed to the following address:

First Name

Address **City** **State** **Zip Code**

Phone Number

Request:

Thank You!

YOUR VOICE
YOUR COMMUNITY
YOUR RAB

The Kelly Restoration Advisory Board (RAB) needs you! The Kelly RAB is holding elections for community member seats on January 18, 2005. Anyone is eligible to serve on the RAB as a community representative. You are especially encouraged to join the RAB if you live, work, or own property in the community surrouding the former Kelly AFB.

WHAT IS THE RAB?

The RAB is a public forum to promote community awareness and obtain community review and comment on environmental restoration activities. The RAB helps to accelerate the overall cleanup and redevelopment of the former Kelly AFB.

RAB members learn about ongoing Kelly cleanup activities, share opinions, and make recommendations on environmental cleanup issues that may affect their homes, businesses, or communities.

WHAT DO RAB MEMBERS DO?

- Provide advice on restoration and environmental projects from the perspective of the community.
- Increase community understanding of the restoration projects on the former Kelly AFB.
- Review and discuss technical plans and documents.
- Attend all RAB meetings (four times a year).

Note: Participation is voluntary and members will not be compensated.

WHO SHOULD BECOME A RAB MEMBER?

Ideal RAB members have an interest in the community and the environment. Candidates should have an open mind and a spirit of cooperation. By serving on the Kelly RAB, you can make a difference in your community.

For more information
or to request an application packet
call (210) 925-0956.

FINAL PAGE

ADMINISTRATIVE RECORD

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