



KELLY AFB
TEXAS

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 3294

KELLY AIR FORCE BASE TECHNICAL REVIEW SUBCOMMITTEE
MEETING AGENDA

Tuesday, 13 April 1999, 6:30 P.M.

Garni Hall, Room 217, St. Mary's University

<u>Topic</u>	<u>Time</u>	<u>Presenter</u>
I. Introduction Agenda Review and Handouts	6:30 - 6:35	Dr Lene'
II. Document Reviews: a) IWCS Closure Strategy b) ISM Workplan for Building 258, Phase II	6:35 - 7:45	KAFB
III. Break	7:45 - 8:00	All
IV. Administrative a) TRS Mission Statement: Discuss comments and approve b) BCT Update c) Spill Summary Report d) Documents to TRS/RAB. e) Location/Time of Next TRS Meeting	8:00 - 8:30	Dr Lene'
V. Adjournment	8:30	All

MEETING MINUTES
KELLY AFB TECHNICAL REVIEW SUBCOMMITTEE (TRS)
TO THE RESTORATION ADVISORY BOARD (RAB)
13 APR 99, ST. MARY'S UNIVERSITY

I. Introduction

The TRS Meeting began at 1830 hours. Attachment 1 is the attendance. Documents delivered to the TRS are specified in atch 2.

II. Document Reviews

a) **IWCS Closure Strategy:** Mr. Don Buelter, SA-ALC/EMRI, presented the plan that Kelly AFB will be using to close and abandon the industrial waste collection system (IWCS). A copy of the presentation is included at atch 3. Mr. Buelter showed the layout of the IWCS on a large map and described how the contractor will perform the closure process.

b) **ISM Bldg 258 Work Plan:** Ms Rhonda Hampton, SA-ALC/EMRI, presented the work plan for the slurry wall project presently in construction in the building 171 parking lot. The contents of the document were discussed and photos of the ongoing work were shown to the TRS.

Discussion by the TRS took place during presentation of these two documents but there were no formal comments submitted by TRS members.

III. Administrative

a) **TRS Mission Statement:** Last month, Dr. Lene' asked that TRS members review and provide comments, if any, to either himself or Maj de Venoge. No comments have been received. Dr. Lene will present the mission statement to the RAB on 27 April for their information.

b) **BCT Update:** Major de Venoge provided an update of the BRAC Cleanup Team meeting held the same day (13 Apr). Key items discussed at the BCT were presented at the TRS.

c) **Spill Summary Report:** There were no reportable spills for the month of March 1999. The report is at atch 5.

d) **Documents to the TRS/RAB:** Atch 2. Next month's document presentations will be on the RCRA Facility Investigation Work Plan for the 300 area and the Basewide Groundwater Flow Model.

e) **Next TRS:** 11 May 99, 6:30pm, St. Mary's, Garni Science Hall

f) Other Administrative items:

1. TAPP Meeting: There will be a meeting on Monday, 19 Apr 99 to discuss the TRS expectations of the TAPP contractor (Clearwater Revival) and the document review.

2. TNRCC TRS Representative: Maj de Venoge and Ms Power noted that the TNRCC representative to the TRS is Ms. Power, and that Mr. Gordon Banner will not be attending unless required.

IV. Adjournment

The TRS adjourned at approximately 7:35 pm.

Attachments:

1. Attendance
2. Documents list
3. IWCS slides
4. ISM Bldg 258 slides
5. Spill Summary Report

#31S
MINUTAS DE LA JUNTA

SUBCOMITÉ DE REVISIÓN TÉCNICA (TRS, POR SUS SIGLAS EN INGLÉS) DE
LA BASE DE LA FUERZA AÉREA KELLY

PARA LA JUNTA ASESORA DE RESTAURACIÓN DE KELLY (RAB, POR SUS
SIGLAS EN INGLÉS)

13 de abril de 1999, Universidad de St. Mary's

I. Introducción: La junta del TRS se inició a las 18:30. El Documento Adjunto # 1 es el informe de asistencia. Los documentos entregados al TRS se especifican en el Documento Adjunto # 2.

II. Revisión de Documentos:

A) Estrategia de Cierre del Sistema de Recolección de Desperdicios Industriales (IWCS por sus siglas en inglés): El Sr. Don Buelter de SA-ALC/EMIR presentó el plan que usará la Base Aérea Kelly para cerrar y abandonar el IWCS. Se incluye una copia de la presentación como el Documento Adjunto # 3. El Sr. Buelter mostró el esquema del IWCS en un mapa grande y describió cómo iba a realizar el contratista el proceso del cierre.

B) Plan de Trabajo del ISM Edificio 258: La Srta. Rhonda Hampton de SA-ALC/EMIR presentó el plan de trabajo para el proyecto de la pared de lechada que actualmente se encuentra en construcción en el estacionamiento del edificio 171. Se habló del contenido de los documentos y se mostraron al TRS fotografías del trabajo que se está realizando actualmente.

Durante la presentación de estos dos documentos se hicieron comentarios por parte de los miembros del TRS pero no se presentaron comentarios formales ante los miembros del TRS.

III. Puntos administrativos:

A. Misión del TRS: El mes pasado el Dr. Lené le pidió a los miembros del TRS que revisaran la misión del TRS y que de haber comentarios, se los proporcionaran a él o al Mayor de Venoge. No se han recibido comentarios. El Dr. Lené presentará la misión ante el RAB el 27 de abril para su información.

B. Actualización del Equipo de Limpieza BRAC (BCT por sus siglas en inglés): El Mayor Tom de Venoge proporcionó información sobre los avances de la junta del BCT que se llevó a cabo en esta misma fecha (13 de abril de 1999). Los puntos más importantes que se trataron en el BCT se presentaron ante el TRS.

- C. **Informe del Resumen de Derrames:** No hubo derrames reportables en el mes de marzo de 1999. El Informe es el Documento Adjunto # 5.
- D. **Documentos que se entregaron al TRS /RAB:** Documento Adjunto # 2. Los documentos de las presentaciones de próximo mes estarán el Plan de Trabajo de la Investigación de las Instalaciones RCRA para el área 300 y el Modelo de Flujo del Agua Subterránea en toda la Base.
- E. **Siguiente Junta del TRS:** La siguiente junta del TRS será a las 6:30 p.m. del día 11 de mayo de 1999 en el Garni Science Hall, de la Universidad de St. Mary.
- F. **Otros Puntos Administrativos:**
1. **Junta del Programa de Asistencia Técnica y Participación Pública (TAPP por sus siglas en inglés):** Habrá una junta el lunes, 19 de abril de 1999 para hablar de las expectativas que tiene el TRS del Contratista (ClearWater Revival) del TAPP y la revisión de los documentos.
 2. **Representante de la Comisión para la Conservación de Recursos Naturales de Texas (TNRCC por sus siglas en inglés) en el TAPP:** El Mayor de Venoge y la Srta. Power mencionaron que el representante de TNRCC en el TRS es la Srta. Power, y que el Sr. Gordon Banner no va a asistir a menos que así se requiera.

IV. Cierre de la Sesión: Se cerró la junta del TRS aproximadamente a las 7:35 p.m.

VI. Documentos Adjuntos:

1. Lista de Asistencia
2. Lista de Documentos
3. Transparencias de la Presentación IWCS
4. Transparencias de la Presentación ISM del Edificio 258
5. Informe del Resumen de Derrames

Kelly area residents want better clean-up

4-13-99

By JAIME CASTILLO
EXPRESS-NEWS AUSTIN BUREAU

AUSTIN — Residents concerned about contamination around Kelly AFB urged lawmakers Monday to strengthen state regulations which require industries to clean up potentially harmful pollutants before abandoning a site or factory.

Environmentalists have become increasingly concerned about a new set of rules being promulgated by the Texas Natural Resource Conservation Commission, which have been in the works for three years.

Opponents say the rules, which are currently in the public comment process, would make it easier for industries to pull up stakes and leave behind, in some cases, decades worth of contaminants in affected neighborhoods.

If approved as currently written, the new regulations would effectively water down clean-up requirements for contaminated areas.

The current regulations say an area must not pose a cancer risk to nearby residents of more than one in one million. The new rules would reduce that burden to one in 100,000.

On Monday, representatives of the Kelly AFB Environmental Res-

toration Advisory Board argued in favor of a House bill that would put the former state regulation into law and thus supersede TNRCC's regulations.

The bill also would require polluters to notify residents within 60 days of the discovery of harmful levels of contaminants.

Armando Quintanilla, who has lived near Kelly AFB since 1952, told members of a House committee that residents have never received notice from the U.S. Air Force about contaminated groundwater even though the pollution has been public knowledge for years.

"We have known for years that Kelly spilled jet fuel and other chemicals," Quintanilla said. "It's underneath our homes, streets and schools."

Rick Lowerre, an Austin environmental attorney, said the draft version of TNRCC regulations could give an incentive to industries to leave behind waste.

As drafted, the rules would let a renter who polluted an area choose simply to pay fair market value for the land rather than paying clean-up costs, which are often times much more costly, Lowerre said.

"We shouldn't pull back from the previous regulations," he said.

- NOT TRUE:
- MAIL OUTS / PHONE MAPS
 - COMMUNITY MEETINGS
 - LA PUNYA / X-Press NEWS

Who "represents" the RAB? Who may speak on behalf of the RAB? IS THIS in the charter? Does it need to be?





DEPARTMENT OF THE AIR FORCE
HEADQUARTERS SAN ANTONIO AIR LOGISTICS CENTER (AFMC)
KELLY AIR FORCE BASE, TEXAS

6 APR 1999

MEMORANDUM FOR REMEDIAL ACTION BOARD/TECHNICAL REVIEW
SUBCOMMITTEE (RAB/TRS)

FROM: SA-ALC/EMQC
307 Tinker Drive, Bldg. 306
Kelly AFB, TX 78241-5917

SUBJECT: Monthly Spill Report for March 1999


There have been no reportable quantity or otherwise notable spills for the month of March 1999. Should you have any further questions or require additional information, please contact Mr. Jerry Pantoja at 925-3100 ext. 310 or email jerry.pantoja@kelly.af.mil.

Sincerely

A handwritten signature in black ink, appearing to read "C. Williams", is written over the word "Sincerely".

CHARLES R. WILLIAMS, P.E.
Chief, Environmental Compliance Division

IWCS Closure Strategy



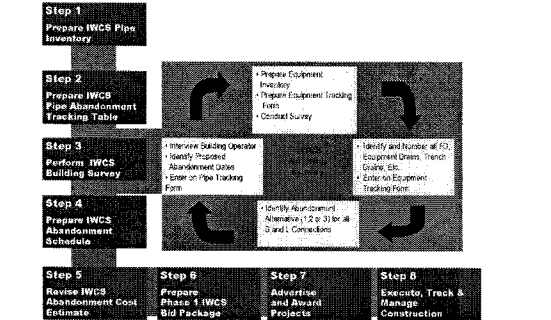
SAN ANTONIO AIR LOGISTICS CENTER
ENVIRONMENTAL MANAGEMENT

13 Apr 99
 Briefer: Don Buelter

Purpose of Closure Strategy

- Develop a closure strategy, with regulatory consensus, which summarizes available analytical data and identifies the appropriate closure standard.
- Incorporate abandonment of IWCS lines into the closure strategy.

IWCS System Abandonment



Step 1 Prepare IWCS Pipe Inventory

Step 2 Prepare IWCS Pipe Abandonment Tracking Table

Step 3 Perform IWCS Building Survey

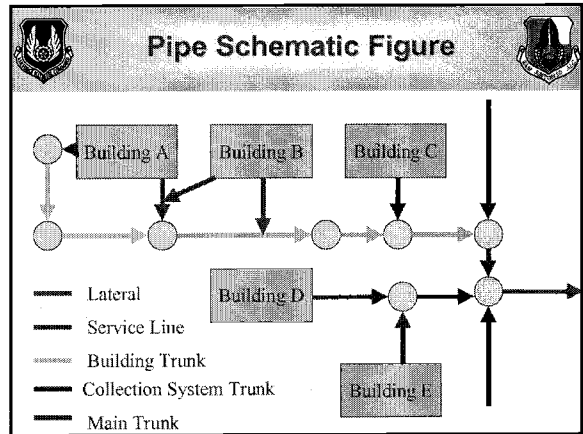
Step 4 Prepare IWCS Abandonment Schedule

Step 5 Revise IWCS Abandonment Cost Estimate

Step 6 Prepare Phase 4 IWCS Bid Package

Step 7 Advortise and Award Projects


Step 8 Execute, Track & Manage Construction




Pipe Abandonment Summary

- Place concrete plugs into all S, BT, CST, and MT connections which terminate in MHs (all alternatives)
- Plug floor drains (all alternatives)
- Fill all MHs with concrete (all alternatives)
- Excavate all L (Alt 1 and 2) and S (Alt 1) connections at the building, cut and plug pipes


Existing Information




Zone 3 Soils (IWCS)




- The RI performed at Zone 3 consisted of 670 SOV samples and 176 soil samples
- Five sample locations exceeded RR2-GW (industrial) for inorganics
- The investigations concluded that soil contamination in the area is generally insignificant compared to groundwater contamination





Zone 4 Soil (IWCS)




- Site SS051 refers to the part of the IWCS located in Zone 4
- The RI performed at SS051 consisted of 18 sample locations
- Seven sample locations exceed RRS-2 GWP-Industrial for inorganics
- Two sample locations exceeded RRS-2 GWP-Industrial for organics




Closure Strategy


Development of Closure Strategy



- Considered physical site conditions
- Considered analytical data collected as part of the Zone 3 RI investigation
- Considered the Zone 4 RI investigation of Sites SS051 and SS052
- Considered ongoing/planned GW Remediation
- Considered TNRCC RRS



Closure Strategy for the IWCS



- Obtain a RRS 3 Closure
- Leaving some soils that exceed RRS-2 GWP-Industrial in place
- Additional soil sampling at IWCS invert in several locations
- Removing the source through IWCS cleaning and abandonment
- Ensuring containment/treatment of contaminated GW through Zones 3 and 4 remedial programs



Interim/Stabilization Measures Work Plan for the Building 258 SWMU, Phase 2

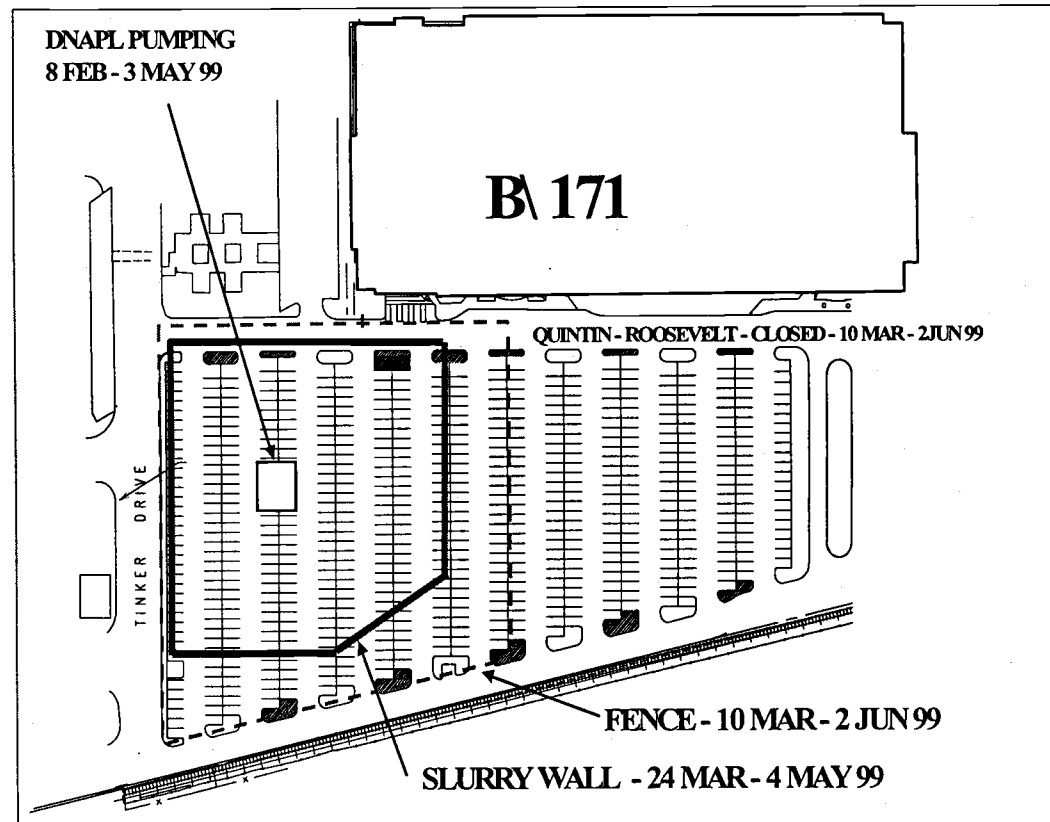


Site Activities

Install Slurry Wall around source of contamination. Excavation will be approximately 2 feet wide by 40 - 48 feet deep. Length of the wall will be approximately 1200 feet.

Site Description

Former Metal Plating Shops.
Currently Building 171 parking lot.





Interim/Stabilization Measures Work Plan for the Building 258 SWMU, Phase 2



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4. DESCRIPTION OF INTERIM MEASURES
 - 1200' Slurry Wall
 - DNAPL removal to extent practicable
 - Monitoring of groundwater concentrations outside the wall
5. DESIGN CRITERIA AND DATA SUFFICIENCY - Data requirements to meet design criteria.
6. PROJECT MANAGEMENT
7. PROJECT SCHEDULE



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8. DESIGN BASIS - General Description of the following:

- Mobilization and Site Preparation
- Installation of Slurry Wall
 - Excavate trench using a long reach backhoe to a depth of 2' into the Navarro clay.
 - Concurrent with excavation, trench will be back filled with 6% - 8% bentonite/ 94% - 92% water.
 - Appropriate excavated soils will be mixed with the bentonite/ water slurry and back filled into the trench.
- Demobilization

9. CONCEPTUAL PROCESS/SCHEMATIC DIAGRAM - Found in specifications

10. SITE PLAN - Map of Site Layout

11. MAJOR COMPONENTS

12. PRELIMINARY MASS BALANCE - not applicable

13. SITE SAFETY AND SECURITY PROVISIONS

14. WASTE MANAGEMENT PRACTICES

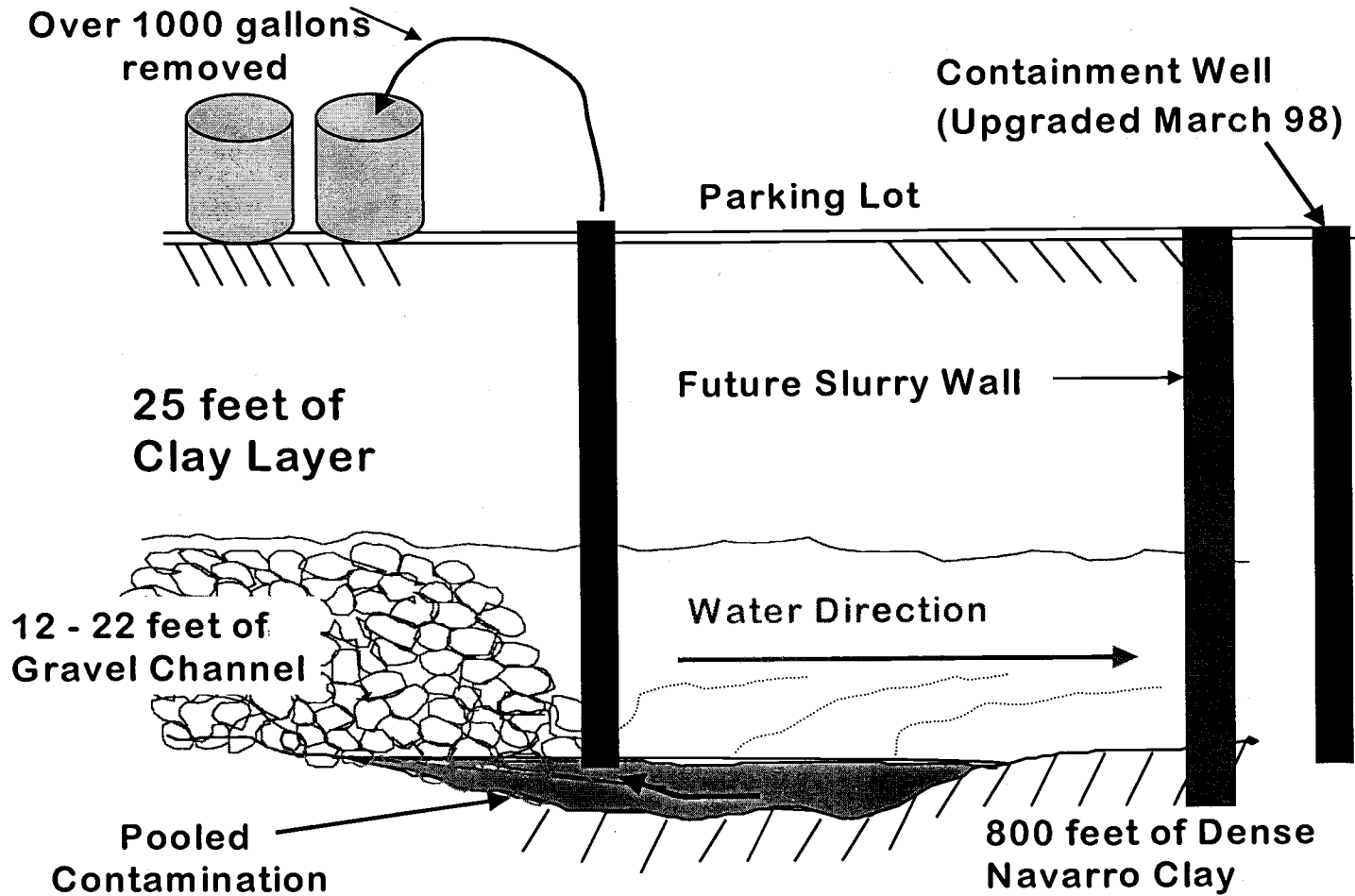
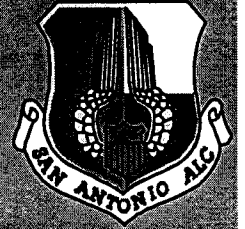
15. REQUIRED PERMITS

16. SAMPLING AND MONITORING ACTIVITIES

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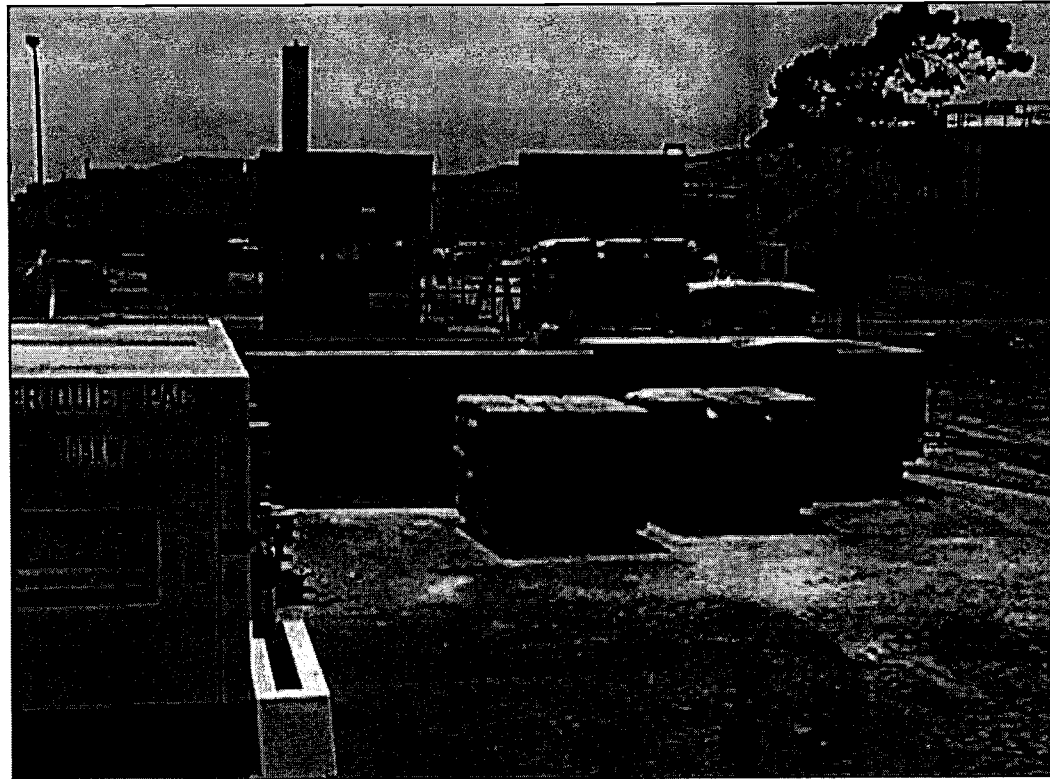
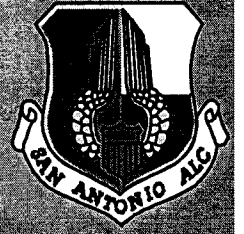
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- Trenching with the trackhoe.
- Bentonite/Water slurry is being added to the trench to act as a hydraulic shoring to hold the trench open until backfilling occurs.
- The PVC pipe is used as a marker for utilities identified during the preliminary digging. Several old utilities that were unknown to the base were found during this investigation.



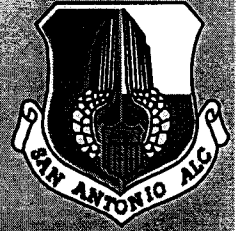
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Bentonite/ Water slurry mixing tanks.



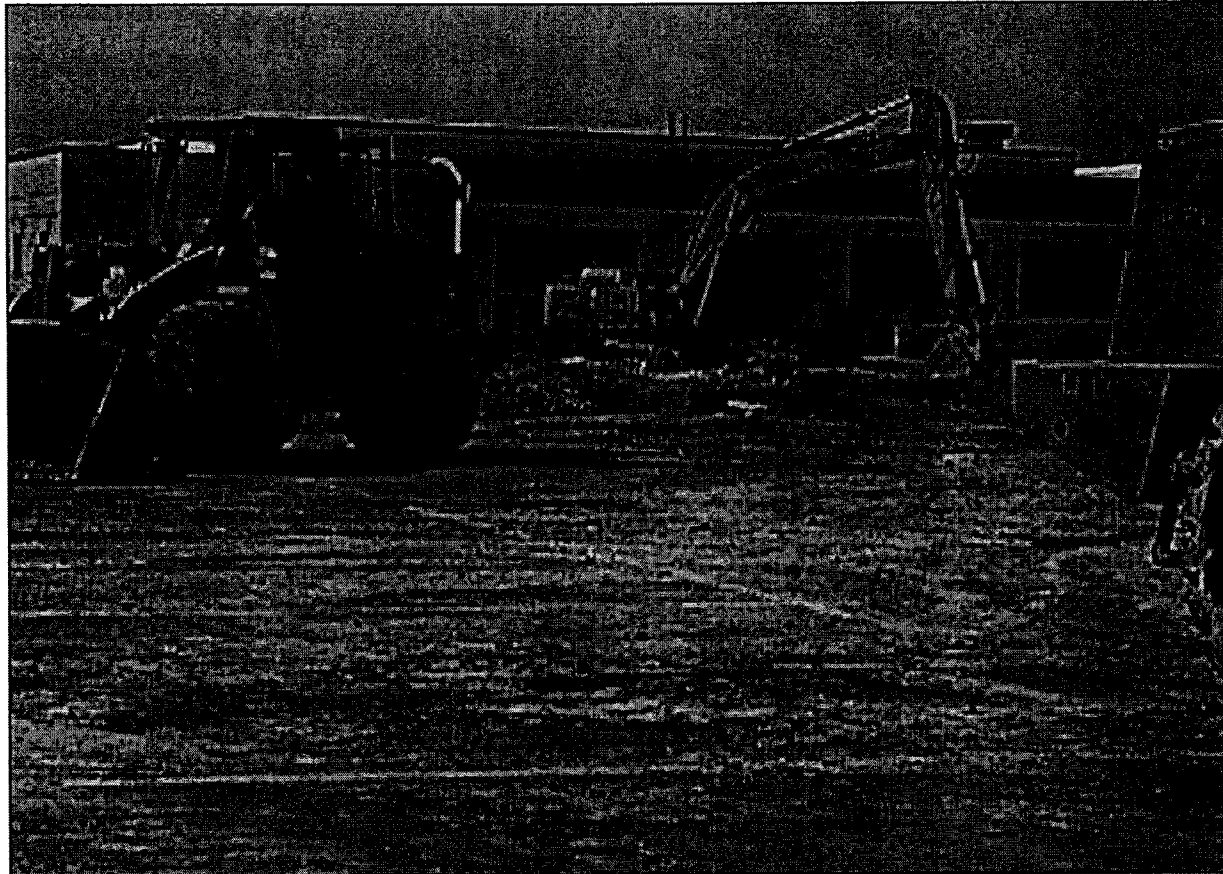
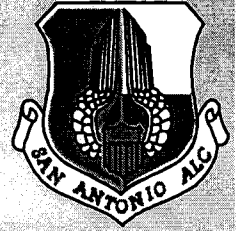
Interim/Stabilization Measures Work Plan for the Building 258 SWMU, Phase 2



- The trackhoe is excavating the trench.
- The dozer is taking the excavated soil to the mixing area.
- An asphalt berm surrounds the site to control run-off.



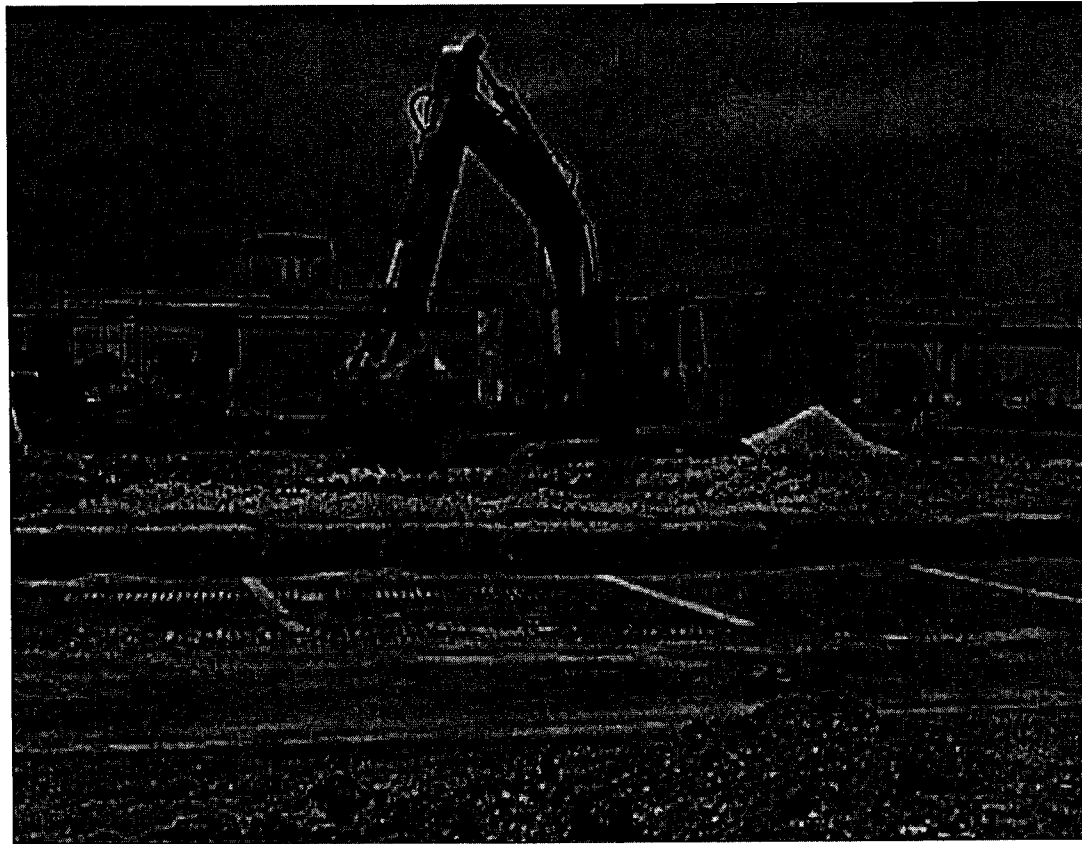
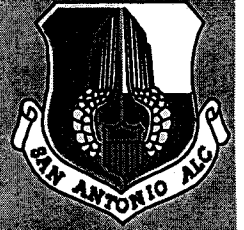
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A full view of the extended reach trackhoe during excavation.



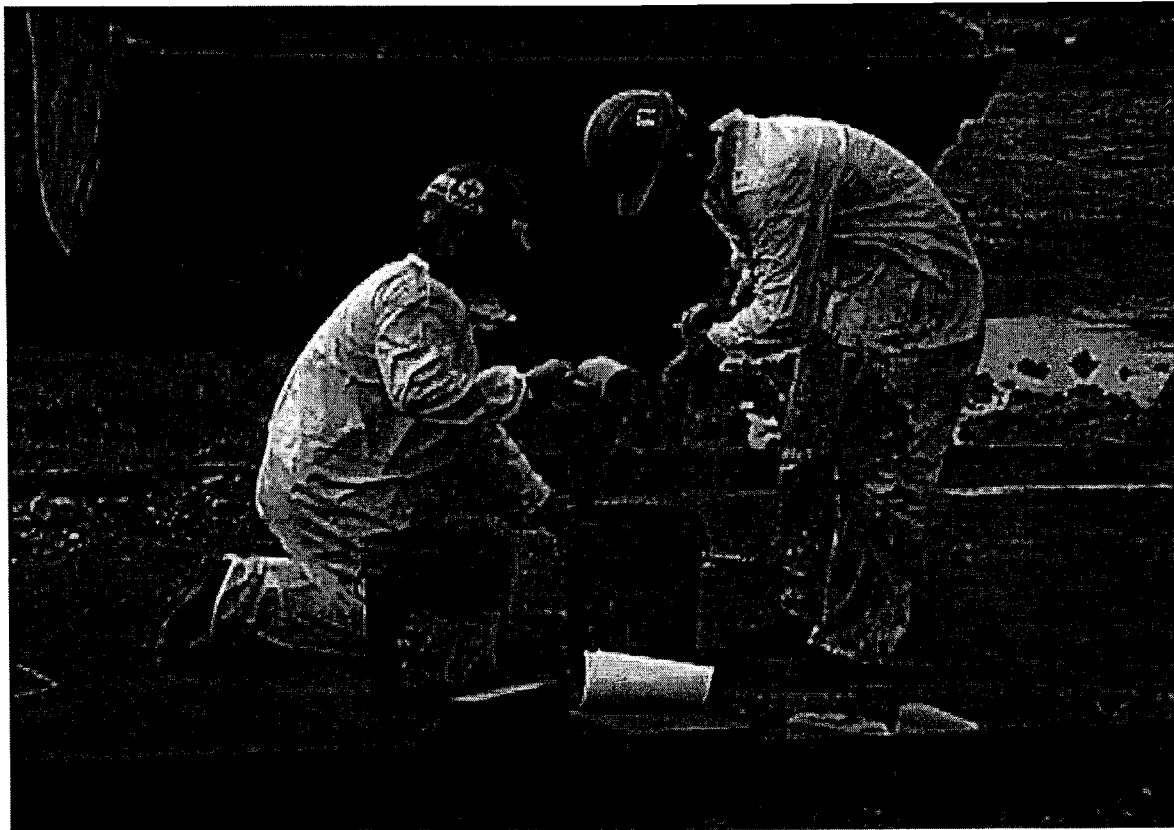
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Hay encloses soil and bentonite mixing area.



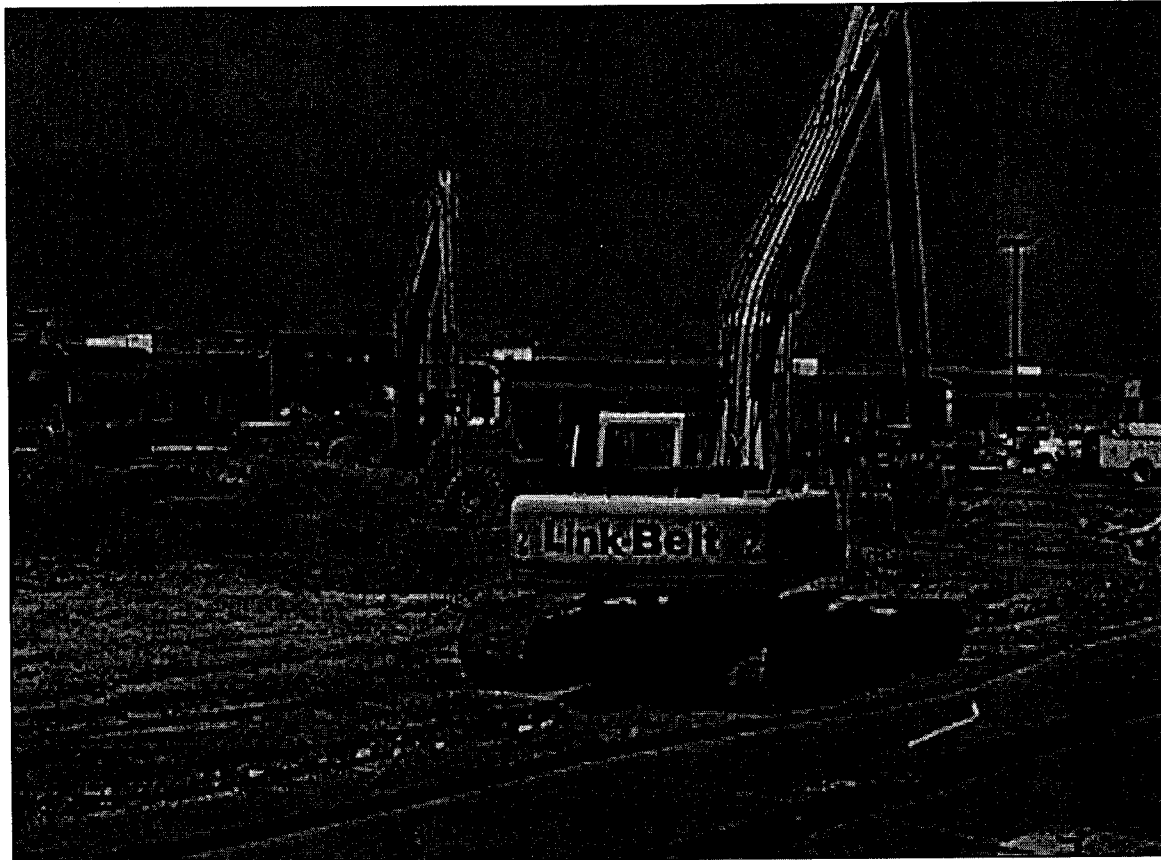
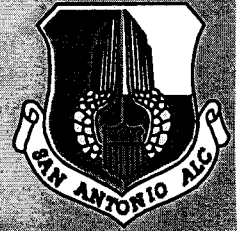
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After the excavated soil is mixed with the bentonite, the slump is tested to assure the proper design mix before backfilling into the trench.



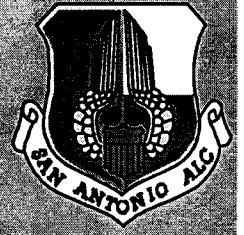
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- Small Back hoe putting soil back in trench.
- Large back hoe trenching.
- Back hoe mixing soil and bentonite.
- Bulldozer moving excavated soil.



Interim/Stabilization Measures Work Plan for the Building 258 SWMU, Phase 2



- DNAPL Compound.
- Frac tank .

**Interim/Stabilization Measures
Work Plan for the Building 258 SWMU,
Phase 2**

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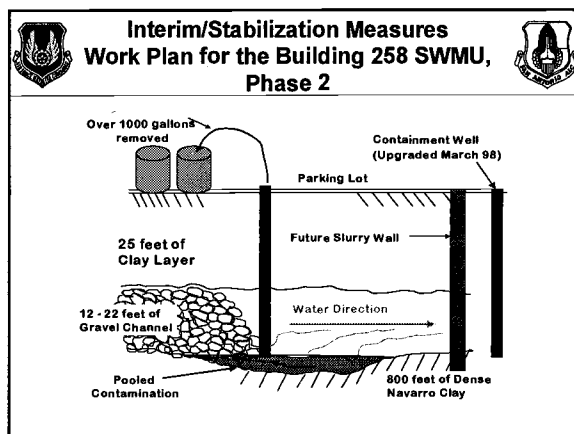
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14. WASTE MANAGEMENT PRACTICES
15. REQUIRED PERMITS
16. SAMPLING AND MONITORING ACTIVITIES
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A full view of the extended reach trackhoe during excavation.

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Bentonite/ Water slurry mixing tanks.

**Interim/Stabilization Measures
Work Plan for the Building 258 SWMU,
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Hay encloses soil and bentonite mixing area.

1 Executive Summary

2 Unit SD-1 is an inactive interim-status surface impoundment located at Kelly Air Force Base
3 (AFB) in San Antonio, Texas. Unit SD-1 was operated as part of the Kelly AFB industrial
4 wastewater treatment plant (IWTP). Unit SD-1 ceased operations in 1982, and sludges and
5 contaminated soil were removed in 1987. Investigations identified detectable concentrations
6 of contaminants in soil following the removal actions.

7 In anticipation of the pending Resource Conservation and Recovery Act (RCRA) permit,
8 Kelly AFB elected to proceed with a closure investigation to determine the Texas Natural
9 Resource Conservation Commission (TNRCC) Risk Reduction Standard (RRS) applicable to
10 closing Unit SD-1. The closure investigation strategy was presented to TNRCC and the U.S.
11 Environmental Protection Agency (EPA) in May 1997. Informal comments received verbally
12 from the regulatory agencies were incorporated into the *Closure Investigation Plan for Units*
13 *SA-2 and SD-1* dated November 1997 (referred to as the Closure Investigation Plan
14 throughout the remainder of this report). The Closure Investigation Plan was included as
15 an attachment the *RCRA Closure Plan for Units SA-2 and SD-1* submitted to TNRCC for
16 review in September 1998. TNRCC approved the plan with modifications on February 18,
17 1999.

18 This RCRA Closure Report fulfills the requirements for closure of Unit SD-1 under the
19 RCRA hazardous waste regulations, the TNRCC RRSs, and the conditions of the RCRA
20 permit. It contains the findings of field sampling, implemented in accordance with the
21 Closure Investigation Plan, and the results of the data evaluation. The intent of this report is
22 to demonstrate the closure of the soils at this site according to the regulations and permit
23 conditions referenced above. This report also demonstrates that the closure approach meets
24 the overall closure objective to minimize the need for further maintenance and protect
25 human health and the environment by minimizing post-closure escape of hazardous
26 constituents into the environment.

27 An extensive RCRA groundwater monitoring program was implemented specifically for
28 these sites to fulfill the requirements of the Updated Groundwater Quality Assessment Plan
29 (GQAP), which was submitted pursuant to an Agreed Order issued in 1989 by the Texas
30 Water Commission (TWC), now the TNRCC. The quarterly groundwater monitoring also
31 was conducted to meet the requirements of Title 40, Section 265, Subpart F of the Code of
32 Federal Regulations (CFR) and 30 TAC 335.116. As of 12 June 1998, the groundwater
33 monitoring requirements must be accomplished in accordance with the Compliance Plan,
34 CP-50310, issued by the TNRCC. The Compliance Plan stipulates groundwater monitoring
35 will be conducted on a semiannual basis.

36 Operational History

37 Unit SD-1, a surface impoundment measuring about 1 acre, is located near the southern
38 boundary of Kelly AFB and about 300 feet north of Leon Creek. The drying beds at Unit SD-
39 1 were used from the early 1960s until July 1982 for drying IWTP sludges (HNUS, 1992).
40 The beds were constructed with concrete sides and a gravel/clay bottom and equipped

1 with an underdrain to collect filtrate. Unit SD-1 has been classified as a RCRA-regulated
2 unit due to heavy metals contained in the IWTP sludge. A Post-Closure Care Permit
3 Application for Unit SD-1 was submitted to the TNRCC in 1989 (Peer, 1989). RCRA Permit
4 HW-50310 was issued 12 June 1998 and addresses closure and post-closure care
5 requirements.

6 Closure Investigation Results

7 The RCRA permitting standards for closure of RCRA-regulated units¹ require that a facility
8 be closed in a way that minimizes the post-closure escape of hazardous waste, hazardous
9 constituents, leachate, run-off, or decontamination products to the environment. The
10 TNRCC implements these closure requirements through RRSs and requires the owner to
11 show that a site meets one of the following standards:

- 12 • RRS No. 1: Closure to Background
- 13 • RRS No. 2: Closure to Health-Based Standards and Criteria
- 14 • RRS No. 3: Closure with Controls

15 Data collected at the site were compiled to determine which RRS applies to Unit SD-1.

16 Conclusions

17 The results of soil sampling at Unit SD-1 indicate the presence of metals at concentrations
18 above background. Organic chemicals, including semivolatile organic compounds (SVOCs),
19 polychlorinated biphenyls (PCBs), and chlorinated pesticides, were also detected. The
20 closure investigation demonstrates that the soil conditions meet RRS No. 2 criteria. Kelly
21 AFB intends to close the site under existing conditions according to RRS No. 2. The deed
22 recordation language is included in Appendix F. Kelly AFB will submit a Deed Certification
23 within 90 days of receipt of TNRCC approval of this report and concurrence that the site
24 conditions meet RRS No. 2 closure requirements.

¹ The TAC incorporates the federal RCRA permitting standards of 40 CFR 265 by reference in 30 TAC 335.112(a)(6).

1

Executive Summary

2 Unit SA-2, the Industrial Waste Sludge Lagoon, is an inactive interim-status surface
3 impoundment located at Kelly Air Force Base (AFB), San Antonio, Texas. Unit SA-2 was
4 operated as part of the Kelly AFB industrial wastewater treatment plant (IWTP). Unit SA-2
5 ceased operations in 1980, and sludges and contaminated soil were removed in 1987.
6 Investigations after the removal actions identified detectable concentrations of
7 contaminants in soil following the removal actions.

8 In anticipation of the then-pending closure and post-closure Resource Conservation and
9 Recovery Act (RCRA) permit, Kelly AFB elected to proceed with a closure investigation to
10 determine the Texas Natural Resource Conservation Commission (TNRCC) Risk Reduction
11 Standard (RRS) applicable to closure of Unit SA-2. The closure investigation strategy was
12 presented to TNRCC and the U.S. Environmental Protection Agency (EPA) in May 1997.
13 Informal comments received verbally from the regulatory agencies were incorporated into
14 the *Closure Investigation Plan for Units SA-2 and SD-1* dated November 1997 (referred to as
15 the Closure Investigation Plan throughout the remainder of this report). The Closure
16 Investigation Plan was included as an attachment to the *RCRA Closure Plan for Units SA-2
17 and SD-1* submitted to TNRCC for review in September 1998. TNRCC approved the plan
18 with modification on February 18, 1999.

19 This RCRA Closure Report fulfills the requirements for closure of Unit SA-2 under the
20 RCRA hazardous waste regulations, the TNRCC RRSs, and the conditions of the RCRA
21 permit. It contains the findings of field sampling, implemented in accordance with the
22 Closure Investigation Plan, and the results of the data evaluation. The intent of this report is
23 to demonstrate the closure of the soils at this site according to the regulations and permit
24 conditions referenced above. This report also demonstrates that the closure approach meets
25 the overall closure objective to minimize the need for further maintenance and protect
26 human health and the environment by minimizing post-closure escape of hazardous
27 constituents into the environment.

28 An extensive groundwater monitoring program was implemented specifically for these
29 sites to fulfill the requirements of the Updated Groundwater Quality Assessment Plan
30 (GQAP) which was submitted pursuant to an Agreed Order issued in 1989 by the Texas
31 Water Commission, now the TNRCC. The quarterly groundwater monitoring also was
32 conducted to meet the requirements of 40 CFR 265 Subpart F and 30 TAC 335.116. As of
33 June 12, 1998, the groundwater monitoring requirements must be accomplished in
34 accordance with the Compliance Plan, CP-50310, issued by the TNRCC. The Compliance
35 Plan stipulates groundwater monitoring will be conducted on a semiannual basis.

36 Operational History

37 Unit SA-2, a surface impoundment measuring about 1.5 acres, is located near the southern
38 boundary of Kelly AFB and about 100 feet north of Leon Creek. The unlined impoundment
39 was used from 1962 to 1980 for drying and containing IWTP sludges when the Unit SD-1
40 sludge drying beds were not operating. Unit SA-2 has been classified as a RCRA-regulated

1 unit due to a June 1982 inspection that revealed a discharge of batch-treated waste
2 containing heavy metals entering the lagoon. The former Texas Water Commission (TWC)
3 (now the TNRCC) and Kelly AFB personnel initially performed closure sampling at the
4 RCRA site. A Post-Closure Care Permit application was submitted to the TNRCC in 1989
5 (Peer, 1989), and Permit HW-50310 was issued 12 June 1998.

6 Closure Investigation Results

7 The RCRA permitting standards for closure of RCRA-regulated units¹ require that a facility
8 be closed in a way that minimizes the post-closure escape of hazardous waste, hazardous
9 constituents, leachate, run-off, or decontamination products to the environment. The
10 TNRCC implements these closure requirements through RRSs and requires the owner to
11 show that a site meets one of the following standards:

- 12 • RRS No. 1: Closure to Background
- 13 • RRS No. 2: Closure to Health-Based Standards and Criteria
- 14 • RRS No. 3: Closure with Controls

15 Data collected at the site were compiled to determine which standard applies to Unit SA-2.

16 Conclusions

17 The results of soil sampling at Unit SA-2 indicate the presence of metals at concentrations
18 greater than background levels. Organic compounds including volatile organic compounds,
19 (VOCs), semivolatile organic compounds (SVOCs), polynuclear aromatic hydrocarbons
20 (PAHs), and pesticides were also detected. The closure investigation demonstrates that the
21 contaminant concentrations meet RRS No. 2 criteria. Kelly AFB intends to close the site
22 under existing conditions according to RRS No. 2. The deed recordation language is
23 included in **Appendix F**. Kelly AFB will submit a Deed Certification once the TNRCC
24 acknowledges that the site conditions meet RRS No. 2 closure requirements.

¹ The Texas Administrative Code (TAC) incorporates the federal RCRA standards of the Code of Federal Regulations (CFR), Title 40, Section 265 by reference in 30 TAC 335.112 (a)(6).

DEVENOGE TOM MAJ SA-ALC/EMR

From: glene@alvin.stmarytx.edu
Sent: Friday, April 09, 1999 4:00 PM
To: TOM.DEVENOGE@KELLY.AF.MIL
Subject: TRS Meeting

Tom:

Sorry I did not get back to you sooner, but things have pretty hectic around here. The agenda for Tuesday's meeting looks fine. I was going to try to put together a list of e-mail addresses but got diverted to other things.

If you would like to set up a pre-RAB meeting with General Murdock, any late afternoon except Monday the 19th would work for me.

I did get a copy of the confirmation letter to Clearwater Revival from Adam G. Antwine, Chief, Environmental Programs. We will need to notify members of the TRS.

Thanks for your offer of help in prepping for the RAB, but right now I can't think of anything I need. I will keep the offer in mind however.

See you soon,
Gene

TRS MISSION STATEMENT

The Technical Review Subcommittee (TRS) is established by the Restoration Advisory Board (RAB) for several purposes that serve as the mission of the TRS:

* To provide the RAB, and thereby, Kelly Air Force Base (AFB) with advice on technical matters regarding the environmental restoration program.

-- Review and provide advice to the Kelly AFB on technical documents generated as part of the cleanup program

-- Express community member perspectives in the form of advice for improved conduct of the cleanup program

-- Focus discussions on Installation Restoration Program (IRP) sites and cleanup activities for these respective sites for the purpose of providing specific advice on cleanup activities

* To serve as a conduit of information to local community members and stakeholders for the purpose of promoting understanding of cleanup activities and thereby the generation of advice to KAFB

* To allow for the free exchange of thoughts and ideas regarding cleanup matters on Kelly AFB

* To facilitate the efficient functioning of the RAB by minimizing the amount of detailed technical discussion at the RAB

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