

**RESPONSES TO COMMENTS ON
DRAFT PRELIMINARY ASSESSMENT REPORT, FORMER GALENA FORWARD OPERATING LOCATION, ALASKA
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1.		<p>The PA report was intended to be a comprehensive document. Several meetings and discussions were held on this topic, and multiple scoping and file review sessions focused on investigating all information to develop the lists of sites to be addressed. Where sites are already addressed by other efforts the decision during scoping was to refer the reader to those efforts. An example of this was the treatment of existing IRP sites which are already being addressed under the restoration program. During the preparation of the PA several potential or existing sites were investigated and then intentionally not mentioned in the document. This practice calls into question the comprehensive nature of the investigation.</p> <p><i>[Comments are segregated below by a. through d. for clarity]</i></p> <p>a. Please compile a complete listing of all sites and potential areas of concern that were investigated but then excluded from the PA.</p> <p>b. Please provide the programs under which those sites are being investigated and</p>	<p>The U.S. Air Force (USAF) intends the Preliminary Assessment (PA) to be a comprehensive document which addresses areas of concern (AOCs) not already included in an existing USAF investigation program.</p> <p>a. Agree: In addition to the specific comments provided by Alaska Department of Environmental Conservation (ADEC), the USAF reviewed the 2009 Galena Sampling Uncertainty Matrix and the 2010 Environmental Baseline Survey (EBS) to identify additional AOCs. A comparison of these documents to the PA AOCs is included as an attachment to this Response to Comments (RTC) and will be included in the PA.</p> <p>b. Agree. Table 1-1 lists the existing Environmental Restoration Program (ERP) sites and the features (sources of contamination) being addressed as part of the ERP program. Sites investigated under the Military Munitions Response Program (MMRP) are also listed in this table. AOCs from the PA will be either be classified as no further action/closed or will proceed into the ERP depending upon the results of the site inspection (SI) sampling.</p> <p>c. Disagree. The USAF will continue to update schedules for the ERP and MMRP and disseminate these to ADEC and the public through the Restoration Advisory Board (RAB) and Technical Project Team (TPT) meetings. Adding a schedule to the PA report, which will be a one-time document, will not allow for future schedule</p>	<p>a. Response Accepted.</p> <p>b. Response Accepted.</p> <p>c. Response Accepted.</p> <p>d. Response Accepted.</p>	Accepted

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		<p>c. a schedule that will be followed to complete the investigation. Sites that ADEC believes should be included in the PA are also referenced in comments below.</p> <p>Sites covered in the PA report are defined in section 1.2 (page 1-1) as <i>“facilities and leased areas where former USAF activities may have caused releases of hazardous substances or petroleum products to the environment.”</i></p> <p>ADEC, under regulation 18 AAC 75.990, defines a site as <i>“an area that is contaminated, including areas contaminated by the migration of hazardous substances from a sources area, regardless of property ownership.</i></p> <p>Additionally, CERCLA defines facility as <i>“...(B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.”</i></p> <p>d. Under these regulatory definitions, investigations into contamination due to</p>	<p>updates, which may lead to confusion for the public.</p> <p>d. Agree. Text in Section 1.2 will be changed to state “Facilities and leased areas where USAF use was documented provided the starting point for evaluating the types of activities undertaken and the types of hazardous substances used by the USAF at the Former Galena FOL that could have caused releases of hazardous substances or petroleum products to the environment”.</p>		

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		<p>USAF activities are not only to be limited to leased land areas. Off site areas where contamination is suspected must also be documented, investigated, and managed. It is not appropriate to exclude areas for investigation based on property lines, contracts, or funding sources. If a site is to be investigated under some other program based on these issues then at the very least the PA should tell the reader the program or agency that will investigate it, when it is planned for investigation, and why it was not investigated under this comprehensive effort.</p> <p>Sites that ADEC believes should be included in the PA are also referenced in comments by individual areas of concern.</p>			
2.		<p>The report is in need of some technical editing. Several instances of typos and misspellings were encountered.</p> <p>Examples (not inclusive):</p> <ul style="list-style-type: none"> • Page 6-1, 6.0: Typo first bullet. Missing space between words. • AST 1569, Site Location: 	Agree. The noted changes will be made.	Response Accepted.	Accepted

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		<p>Typo: extra space between "the Building" in line 2, paragraph 1.</p> <ul style="list-style-type: none"> • AST 1569, Site Description: Typo: Final paragraph in section. No period at last sentence and inadvertent equal sign added. • UST 1400, Regulatory Status: Typo last sentence, extra period at the end. • UST 1400, Recommendations: Typo last sentence, extra period at the end. • AST 77506, Site Description and History: "...the deicing fluid is <i>mostly</i> (typo) <i>likely</i> potassium acetate..." • UST 1429, Regulatory Status: Typo in last sentence, extra period. • UST 1854, October 2009 Site Visit Observations: Typo UST 1854 referred to as 1884. • TACAN, Page 1 is repeated on the back side of Page 1. • B1403, Site Description and 			

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		<p>History: Typo. First sentence of second paragraph is broken up by a period.</p> <ul style="list-style-type: none"> • Page 2-2, 2.1.4: Last paragraph, line 7. Typo, extra comma. • Page 6-1, 6.0: Typo, space missing between '23' and 'sites'. 			
3.		<p>The report is in need of reformatting to increase readability. This document is also a public document so sites and information of concern needs to be easily accessible.</p> <p>For example:</p> <ul style="list-style-type: none"> • The table titled "COMPARISON OF SITES LISTED IN THE ENVIRONMENTAL BASELINE SURVEY (FEBRURARY 2010) AND THE DRAFT PRELIMINARY ASSESSMENT (APRIL 2010)" has no table number associated with it, nor is it listed in the Table of Contents. The information provided in this table is very helpful. It is important to be able to access the information contained in this 	<p>Agree. The comparison table will be added to Section 1 of the PA report and page numbering will be revised to make the document, including Appendix A, more readable.</p>	Response Accepted.	Accepted

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		<p>table. However, due to the aforementioned issues, retrieval of this information is difficult.</p> <ul style="list-style-type: none"> Also for ease of reference, the tables and figures presented in this report should also have page numbers. These page numbers should then be incorporated into the Table of Contents. <p>Appendix A is arduous to navigate. It is difficult to locate an individual site when not reading through the PA sequentially, because the page numbers restart at "page 1" for each site. The individual sites discussed in this Appendix need to be distinguished better. For example: The separator page at the beginning of each site can contain a lateral 'site name tab' for easier location of a site. Also, Appendix A should be sequentially numbered and these page numbers then included into the Contents page (page i, Appendix A).</p>			
4.		Interviews with personnel and personal communication transcripts should be included in the PA report. The only types of information provided in Table 4-	Partially Agree. Where possible, details of interviews will be provided. However, some personal communications referenced in the PA report occurred during previous projects and are documented in historical reports. When	Response Accepted. However, if no record of the interview exists, please refer to the	Agree – The document has been revised as needed to reflect this change. When discussing an

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		<p>1 are: the contacts' names, dates, affiliation, and type of assistance provided.</p> <p>There are two excellent examples of the inclusion of personal communication included in the PA report. 1. Written correspondence between Al Weilbacher and the AKNHP. 2. A telephone conversation record between Vivian Tokar and Joe Williamson.</p> <p>However, the rest of the information provided by personnel or personal communication was not documented in this manner. This can be accomplished very simply by including notes taken during the conversation in field/log books in an Appendix, or by presenting the conversations in another technique.</p> <p>The rationale for including these interviews is as follows: it provides reliable and dependable statements for future reviewers of this report and investigators. Also, it decreases the question of subjectivity with regard to interpretation of the interviewee's responses.</p>	<p>historical personal communication is used, the source document will be identified.</p> <p>Table 4-1 lists both (1) people who supported the 2009 Former Galena FOL site visit by providing access to facilities, and (2) people interviewed on specific topics. The table will be changed to identify the role the individuals played. Either conversation records or copies of emails will be provided in the appendixes as documentation for the interviews.</p>	<p>report, document, or other source of information consulted when writing about the interview in the PA, and also state in the text that no record of the interview exists.</p>	<p>interview, where no record of the interview exists, the text refers to existing reports, documents of other sources of information and states that no record of the interview exists.</p>

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5.		<p>While it appears that the AST, UST, and OWS tables from the 2010 EBS were thoroughly reviewed for sites, it also appears that the text of the 2010 EBS was not examined for sites. The narratives also need to be scanned to pick up additional sites not covered by the 2010 EBS tables.</p> <p>For example, page 3-33 heading 3.3.8, of the 2010 EBS describes an area of land with elevated levels of DDT north of the BLM housing area. This area is not mentioned in the PA report, and is separate from the ERP site (CS001).</p> <p>After initial investigation many of these areas may not require further action. However, it is still important they are identified, investigated, and documented so they can be appropriately closed.</p> <p>Additional sites identified from review of the 2010 EBS narratives are identified within the specific comments that follow</p>	<p>Agree. The entire 2010 EBS was reviewed for additional sites. See attached list of the specific sections where AOCs were identified for inclusion in the PA. Note that the PA is not meant to duplicate the EBS. Where information in the EBS was indicative of a potential release to the environment that warrants evaluation under Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) or the State underground storage tanks (UST) program, it was included in the PA. With regard to the elevated levels of DDT noted in the comment, the EBS states there was no documentation of spills or improper application. In addition, historical pesticide results were reviewed and an area north of known Bureau of Land Management (BLM) housing areas with elevated pesticides could not be determined. Pesticides are target analytes at ERP Sites ST009, CG001, and S1769 and in other areas where historical exceedances of pesticides were detected. No additional PA sites have been added on the basis of this statement in the EBS.</p>	<p>Disagree with response.</p> <p>The 2010 EBS should have also been reviewed for sites that warrant investigation under 18 AAC 75 as well. Please ensure that the 2010 EBS is also scanned for these sites.</p> <p>The elevated DDT soils have been mentioned in EBS reports since at least 1996. In order to take care of this discrepancy, please include this site, your historical record review, findings, and conclusions in the PA in order to properly document that it is a non-site.</p> <p>Refer the reader to the pesticide sampling that is being conducted at sites with known pesticide detections, and areas where pesticides were likely to be stored or processed.</p>	<p>Agree - The DDT area north of the BLM housing has been added to the PA as Site BLM Pesticides. The text in Section 2.2.3 has been updated to include a discussion of the site-wide review for pesticides.</p> <p>The text was updated to confirm that the 2010 EBS was reviewed for sites that warrant evaluation under 18 AAC 75 (as well as CERCLA).</p>
6.		Historically PCB contamination has been present at military	Partially Agree. The PA site investigations will incorporate polychlorinated biphenyls (PCBs)	Disagree with	Agree - The PA site investigations will

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		<p>facilities. Transformer locations and disposal areas need to be evaluated for sampling and investigation needs. Areas of potential PCB contamination have not yet been sampled because they are not located within the established ERP sites. PA site investigations should incorporate PCBs into the lists of analytes for sites that could potentially contain PCB contamination. No records of a PCB oil release found for a site does not indicate that sampling should not occur at that site.</p> <p>In addition to sampling the transformer locations, public concern has been identified concerning PCB oil disposal practices west of the dike. It was reported that it was a common practice to empty transformers at this location. The PA should recommend an investigation of this claim.</p>	<p>into the list of target analytes where evidence of their use is found and there is the potential for a release to the environment to have occurred.</p> <p>In general, all former locations of pole-mounted or pad-mounted transformers will not be investigated unless there is documentation of a spill. In addition, documentation of the interview with Mr. John Rose, the head of the high-voltage electrical shop in Galena, will be added as additional documentation. Mr. Rose personally removed PCB-containing components in the Airfield Lighting Vault, changed the pole-mounted transformers (no "leakers" is the term Mr. Rose used to clarify that the pole-mounted transformers removed did not have evidence of leaks or spills) from PCB to non-PCB units, and managed the very limited maintenance on the pad-mounted transformers.</p> <p>The USAF will look into claims by the community regarding PCB disposal west of the dike to determine if these areas warrant inclusion in the PA.</p>	<p>response.</p> <p>The response does not accurately reflect the agreement reached regarding the investigation of transformers at Galena.</p> <p>The sentence should read "The PA site investigations will incorporate polychlorinated biphenyls (PCBs) into the list of target analytes where evidence of their use is found or suspected, and there is potential for a release to the environment to have occurred."</p> <p>All transformers that are not specifically documented as non-PCB are considered suspect. Additionally, during the June 2010 Anchorage TPT Meeting document, it was agreed that if it cannot be confirmed that transformers were located inside a building, PCBs would be added to the target analyte list. Refer to</p>	<p>incorporate polychlorinated biphenyls (PCBs) into the list of target analytes where evidence of their use is found or suspected and there is the potential for a release to the environment to have occurred. The text has been updated.</p> <p>The area of potential PCB disposal west of the dike is being investigated under Site DSWD based on information received from community members during the June 2011 RAB meeting.</p>

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				document titled "Specific Comments on 27 Sites". Also, please identify how the USAF intends to investigate the public claims regarding PCB disposal west of the dike.	
7.		<p>The 2010 EBS presents in table 4-2 spills that are not identified in the PA.</p> <p><u>Galena City Airport</u></p> <ul style="list-style-type: none"> • 50 gallon diesel fuel spill • 40 gallon diesel fuel spill • 1 gallon diesel fuel spill • 2 gallon diesel fuel spill <p>Chugach Developmental Corporation and Chugach Support Services are listed as the responsible parties; however, they are spills from support services provided to the USAF. Therefore, these spills need to be evaluated in the PA.</p> <p><u>Galena City</u></p> <p>A 5 gallon spill of waste oil is reported in the table. The responsible party is listed as the</p>	Disagree. Chugach Development Corporation and Chugach Support Services reported the spills in accordance with their contract and existing ADEC regulations. These spills were not moved forward into the Contaminated Sites Program through the ADEC spill reporting because the response action to the spills was sufficient under ADEC regulations.	<p>Please provide documentation of the spill reports and response actions associated with these spills. Documented spills cannot be assumed to have been cleaned up unless documentation of the cleanup exists.</p> <p>If documentation cannot be provided, additional investigation of these spills may be required.</p>	<p>Agree - The 5 spills are included in the appendix to the 2010 EBS report and are all listed as 'case closed'. These spill reports have been added as an Appendix to the PA (no further investigation of these spills is required).</p> <p>The text has been updated to include spill information and case closed dates.</p>

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		USAF. Therefore this spill needs to be evaluated in the PA.			
8.		<p>The 2010 EBS presents in table 4-2 11 LUSTs that were removed. Some of these USTs were not mentioned in the PA.</p> <ul style="list-style-type: none"> • <u>UST 1556-2</u>- This UST is not mentioned in the PA, and it is not listed on the COMPARISON OF 2010 EBS SITES and PA SITES table. Please clarify if this UST is covered under ERP investigations or whether it needs to be included in the PA. • <u>UST 1700-2</u>- This UST is not mentioned in the PA, and it is not listed on the COMPARISON OF 2010 EBS SITES and PA SITES table. Please clarify if this UST is covered under ERP investigations or whether it needs to be included in the PA. • <u>UST 1837</u>- This UST is mentioned in the COMPARISON OF 2010 EBS SITES and PA SITES table as being investigated under ERP site ST005 POL Tanks Farm. This UST should be considered a 	<p>Agree. See clarifications below:</p> <ul style="list-style-type: none"> • <u>UST 1556-2</u> is part of ERP Site SS017. The text in the PA report will be modified to clarify. • <u>UST 1700-2</u> is part of ERP Site SS019. The text in the PA will be modified to clarify. • <u>UST 1837</u> is part of ERP Site ST020, Building 1837 Petroleum Operations Facility, and is separate from ERP Site ST005. Table 1-1 will be corrected. 	Response Accepted.	Accepted

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		separate site from the ERP site. The nature of investigation at the ERP site involves examining contamination from AST sources. Assessing this UST separate from the ERP site may aid in closing UST 1837 as a source of contamination at ERP ST005.			
9.		It is inappropriate to exclude assessment of the ordnance sites evaluated in the CSE Phase I and II. The PA should reference the concerns, state which areas of concern are being investigated under the MMRP program, and reference whether additional environmental site work has resulted from the recommendation. In addition, the conclusions in those studies have not been accepted or approved by ADEC although they do contain useful information. The stated purpose of the MMRP program is "to make munitions response areas safe for reuse and to protect human health and the environment in the process" (CSE Phase 1, Page 1-1). While the MMRP covers munitions responses on MRAs/MRSs, it did not look	Disagree. Table 1-1 will list MMRP sites, but they will not be evaluated in the PA. These sites will be evaluated through the MMRP process. The Rocket Container site will be evaluated through the MMRP process as well.	Table 1-1 (provided with the RTC) does not list the Rocket Canister Site, Suspected Ordnance Burial Site, Possible Small Arms Ranges, Historical Ordnance Storage buildings, or the Southwest Landfill Please refer the reader to the MMRP Process as well as the guidance that will be followed; e.g. "Air Force Guide for Conducting the CSE Phase I at Air Force Munitions Response Areas (Version 10.0) Oct 06" or "Air Force Guide for Conducting the CSE Phase II at Air Force Munitions Response Areas (Version 4.0) Oct 06" . Also, confirm that these sites will all be investigated under that	Agree – The updated Table 1-1 was not submitted with the RTC. The table has been updated to include the Rocket Container Site, Suspected Ordnance Burial Site, Small Arms Range, Historical Ordnance Storage buildings, and the Southwest Landfill. Section 1.2 of the text has been updated to list the AF guidance that will be followed for the MMRP program.

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		<p>outside the boundaries of the MMRP sites, nor did it recommend how the Air Force is handling the non-munitions solid waste disposals documented in the report. Many sites were examined during the MMRP program and found to have no visible evidence of munitions, however historical use and disposal of munitions and related debris was documented throughout the process. Furthermore, the MMRP report documents potential contaminants of concern that may need to be included in other site investigations in order to evaluate cumulative risk. For example, the Phase 1 report specifically states "Perchlorate contamination at the Galena AS is possible due to the documented use of pyrotechnics." (CSE Phase 1, Page 6-3). Sites where munitions were used, stored, and disposed of should not be left out of the PA.</p> <p>The presence of munitions activity related contamination should be considered in the scoping and investigative stages of neighboring sites that could have been affected.</p> <p>The Phase I and II CSE did not evaluate the Rocket Container</p>		process.	

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		<p>Site. This site was described in the EBS – 2010 and USAF had at least two reports detailing work that needed to be done to clear it. Information provided in the EBS indicated that USAF plans for this site were to mobilize a response to demilitarize the containers and dispose of the scrap metal. However, there has been no action taken. Because the PA writers were instructed to exclude MMRP sites, this inactivity was missed. Additional measures, or further investigation need to be taken at this site. The PA should identify the next appropriate course of action, identify potential contaminants of concern, and recommend this as a site.</p>			

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10.		<p>There is no mention of radiological substances found at Galena in the PA report. A 1989 Woodward Clyde report identified soil borings with higher than background level Geiger counter readings. However, this finding was never further investigated. There has been public concern raised about the possibility of nuclear missiles kept at Galena AS, as well as numerous news media articles referring to nuclear missiles at Galena. In addition several elements on early aircraft and other materials used in their support contained radioactive materials. The combination of these circumstances warrants further assessment about the likelihood of contamination from radiological materials. Please evaluate the possibility of contamination from nuclear missiles and other radiological materials at Galena AS.</p>	<p>Disagree. The USAF will address public concern regarding radiological contamination separate from the PA.</p>	<p>DEC has received the January 2011 Memorandum addressing the radiologic concerns at Galena, and accepts that the investigation was conducted separately from the PA.</p> <p>However, this issue should also be documented the same way other features not covered in the PA were documented.</p> <p>Please provide rationale for the previous investigations that included radiological samplings and discuss why this sampling is no longer necessary. Please refer to the study and 2011 Memo, and include that Memo as an Appendix to the PA. The documentation investigating this concern should be sufficient to justify no further investigations at this time</p>	<p>Agree - Radiological materials has been added to the PA as a site (Site Radiological Materials). The January 2011 memorandum has been included in the supporting documentation for Site Radiological Materials in Appendix A.</p>

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11.		<p>It is stated (page 4-2, 4.1.2.1 of the PA report) that the 1996 and 2008 EBS were used as the main sources of information for the facilities used by the USAF. The 2010 EBS was used to as to prepare the list of ASTs, USTs, and OWSs presented in "Comparison of Sites Listed in the Environmental Baseline Survey (February 2010) and the Draft Preliminary Assessment (April 2010)" Table. The 2010 EBS also represents the most recent available information about the former FOL Galena. Please give rationale supporting why the most recent EBS (2010 EBS) not used as one of the main sources of information.</p>	<p>Agree. The Final 2010 EBS will now be referenced as a main source of information. During the creation of the Draft PA, the 2010 EBS was still in draft form. However, it was reviewed by the USAF and pertinent source documents were used in the PA.</p>	<p>Response Accepted.</p>	<p>Accepted</p>
12.		<p>It is stated (page 4-2, 4.1.2.1) that facilities impacted by lead based paint and/or asbestos containing material were not included in the PA unless the facility had potential for fuel or chemical releases.</p> <p>The rationale behind this decision is not understood. Whether or not a facility handled fuel or chemicals has no impact on whether the lead or other regulated material from that building has impacted surrounding media.</p>	<p>Disagree. As stated in the EBS, Section 2.3.2, Facility Disclosure Factors, "Information on disclosure factors (air quality [indoor], ACM, drinking water quality, LBP, PCBs, and radon) was reviewed. Disclosure factors are substances that are not regulated under CERCLA but may cause environmental concerns. Notification of the presence of disclosure factors is not required under CERCLA Section 120(h)(1); such notification is provided to satisfy real estate transaction requirements." Accordingly, lead based paint (LBP) and asbestos-containing material (ACM) will not be addressed in the PA.</p>	<p>At these sites there is a need to differentiate a 'release' from a 'disclosure'.</p> <p>For example: If lead paint was present at a site, that is not evidence of a release; that would only require a disclosure. However if lead paint was flaking, that is evidence of a release and must be investigated under 18 AAC 75.</p>	<p>Clarification - Lead based paint will not be included in this PA. The Air Force will address this issue with ADEC separate from the PA.</p>

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		<p>All facilities identified in the 2010 EBS with lead based paint or other regulated material need to be included. This also applies to buildings that have been demolished. With disposal of regulated material and lead based paint, ADEC takes a "cradle to grave" approach. The sites where these materials were located need to be identified and investigated for remaining contamination. Proper disposal of the building materials after demolition also needs to be confirmed. If these activities were properly conducted under appropriate permits this should be a simple matter of documenting the activity, identifying the permits, and commenting on whether any long term liability issues may still exist from those disposals. Minimally, sites that contain lead based paint should be identified and recommendations should be made as to whether lead is a COC for soil or water media at that site. This will ensure proper documentation for site closure and future use of that site.</p>		<p>Therefore in order for LBP to not be a contaminant of concern please document the condition of the paint at the site. If the paint was flaking, then lead should be added to the target analyte list at the site.</p> <p>During 2011 meeting with EPA, regulators stated that areas impacted by flaking paint and other building materials may also contain PCBs from construction material sources. These have presented issues at other USAF sites constructed during the same era as the facilities at Galena. The PA should discuss these potential sources and should explain to the reader under which programs these potential contaminants are being looked for.</p>	
13.		<p>The 2010 EBS identifies the ASTs at 1880 to have lead based paint and "presumed" lead contaminated soil. These ASTs were not covered in the</p>	<p>Disagree. All features are already addressed in the Field Sampling Report (FSP) for ERP Site ST005.</p>	<p>Response Accepted.</p>	<p>Accepted</p>

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		<p>PA because they are stated as covered under ERP site ST005 (POL Tank Farm). ADEC recommends that the ASTs at 1880 should be included in the PA and considered separate sites from ST005 because remediation efforts at that site are focused on extensive fuel related contamination from leaks and spills. Because these tanks used lead based paint, efforts to identify contamination from that source need to be addressed. Therefore in order to assure these efforts are not lost in the larger remediation efforts occurring because of fuel related contamination at ST005, ADEC recommends the lead based paint ASTs should be addressed in the PA as a separate site. Recommendations should be made to either continue to address them as a separate site or include the COCs in the existing ERP site.</p>			
14.		<p>All buildings where septic systems and grease traps were utilized need to be identified in the PA. There are septic systems identified in some PA site descriptions; however there are not target additional analytes identified to evaluate these systems. Like the OWSs, septic systems and grease traps</p>	<p>Partially Agree.</p> <ul style="list-style-type: none"> • Septic Systems: Appendix A Sites B400, UST1400, and UST1401 will be updated to include the septic systems and to be consistent with the FSPs. Site FSPs address septic systems. The site description for Site UST1404 will be updated to include a 	<ul style="list-style-type: none"> • First Bullet: Response Accepted. • Second Bullet: Response Accepted. Please include this rationale 	<p>First through Third Bullets: Accepted</p> <p>Forth Bullet: Agree – The grease trap at Building 1859 has been added to the PA as Site B1859 Grease Trap.</p>

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		<p>should also be considered separate sites. Because septic systems are historically sources of contamination due to improper disposal practices they may require a more involved assessment. Please identify PA sites with septic systems and grease traps and evaluate them as separate sites.</p>	<p>description of the septic system.</p> <ul style="list-style-type: none"> • Review of historical photos and facility records indicate a “munitions guard shack” was not associated with Building 1488, but with Building 1400. Building 1488 did not have a guard shack or any associated septic tank. Building 1488, and surrounding facilities (such as the Combat Alert Cell [CAC] and the Combat Alert Cell Traffic Control Point) were connected to the sanitary sewer. • Oil-Water Separator (OWS): All OWSs are identified as individual sites or identified as features of existing ERP Sites. • Grease traps: One grease trap has been identified at Building 1859 (dining hall) (2010 EBS). Building 1859 has been used as a dining facility since it was constructed. Therefore, it is unlikely the grease trap was used for improper disposal of petroleum products or industrial solvents. The grease trap will not be added to the PA. 	<p>in the text.</p> <ul style="list-style-type: none"> • Third Bullet: Response Accepted. • Fourth Bullet: Disagree. Please identify whether this grease trap goes to an injection well or to a sanitary sewer. If the grease trap is associated with an injection well, an SI investigation may be warranted. Grease traps at other active and closed USAF facilities with UI wells have been found to be sources of various contaminants. 	
15.		<p>The 2010 EBS states that the disposal practices for medical and bio-hazardous wastes at Galena AS are unknown. These</p>	<p>Disagree. The EBS states that information regarding disposal practices is unknown based on a review of available documents. Further evaluation is not warranted as there is no</p>	<p>Response Accepted.</p>	<p>Accepted</p>

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		wastes are not addressed in the PA. In order to exclude these as non-sites, additional justification to not further investigate for these wastes needs to be included in the PA.	documentation that indicates improper disposal.		
16.		<p><u>Landfills/Disposal Areas</u></p> <p>There have been additional disposal areas identified and documented at Galena AS, but they have not been evaluated or mentioned in the PA. Documents, maps and photos showing landfill areas, drum piles, and burn pits are included in the PA and then intentionally not mentioned or even evaluated if they do not fall strictly within the leased area boundaries. These areas were used by the Air Force despite not being included in lease boundaries and the evidence for this use is already included in the PA. The landfills and disposal areas that are not covered under ERP sites need to be itemized, evaluated in this PA, or a specific program under which they will be investigated needs to be specified including a schedule for that investigation.</p> <p>These include at a minimum the following areas of concern:</p>	<p>Partially Agree.</p> <ul style="list-style-type: none"> • Item 1: Disposal Site West Dike (Site DSWD) will be added to the PA. • Item 2: The USAF will look into claims by the community regarding PCB disposal west of the dike to determine if these areas warrant inclusion in the PA. • Item 3: The Rocket Container Site will be addressed through the MMRP process. • Item 4: Disposal Site at Building 1769 (Site DS1769) will be added to the PA. • Item 5: Disposal Site North West (Site DSNW) will be added to the PA. • Items 6 and 7 will be addressed with Item 4 because they are the same area. • Item 8: Comments pertain to ERP site LF011 and will not be addressed in the PA. Section 2.3 of the <i>Final Work Plan for Galena Airport Alternate "Wet Pit" Landfill Investigation</i>, August 1998, includes a statement that the landfill was used as a sludge disposal area. This closure work plan was submitted to, and approved by, ADEC's Solid Waste division. CH2M HILL obtained this work plan from Doug Buteyn, 	<p>Item 1: Response Accepted. Please provide a figure to document the area that will be added to the PA. Include referenced photos and correspondence used to identify this area.</p> <p>Item2: Please identify how the USAF intends to investigate the public claims regarding PCB disposal.</p> <p>Item 3: Response Accepted. See Reply to Item 1.</p> <p>Item 4: Response Accepted. See Reply to Item 1. Item 5: Response Accepted. See Reply to Item 1.</p> <p>Item 6: Response Accepted. See Reply to Item 1. Item 7: Response Accepted. See Reply to Item 1.</p>	<p>Item 1: Accepted. Figures are included with Site DSWD.</p> <p>Item 2: Agree - The area of potential PCB disposal west of the dike is being investigated under Site DSWD based on information received from community members during the June 2011 RAB meeting.</p> <p>Items 3 through 7: Accepted.</p> <p>Items 8 and last paragraph: Disagree - Existing landfills will not be added to the PA. They are not AOCs, as they have already been designated as ERP sites. The AF will address this issue with ADEC separate from the PA.</p>

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		<ol style="list-style-type: none"> 1. Disposal Site of West of Dike (DSWD). This site was discussed in BCT meetings, public meetings, and extensive correspondence with ADEC in 2009 and 2010; however it is not included in the PA report nor is it listed as an ERP site. This area needs to be included in the PA report and investigated. 2. A possible transformer oil draining area west of the dike was identified during a public meeting at Galena (2010). This area should be added as a PA site and needs to be investigated for possible PCB contamination from these practices. 3. The Rocket Container Site. This site was not evaluated in the Phase II CSE. There has been no disposal of the debris found in this area. This area was also found to still contain both tar, buried drums, and discarded rocket containers this summer (2010). Additional measures, or further investigation need to be taken at this site. The PA should identify the next appropriate course of action 	<p>ADEC Solid Waste Fairbanks office. Section 2.3 also states that the soil near the empty transformers was sampled for PCBs and PCBs were not detected.</p> <ul style="list-style-type: none"> • Item 9: The EOD area will be addressed through the MMRP process. <p>The USAF will address the ERP landfill sites with ADEC separate from the PA as these are known ERP sites and not AOCs.</p>	<p>Item 8: Please provide the closure documents for this site. The Work Plan approval referenced in the comment response is not a closure report and approval.</p> <p>Item 9: Response Accepted.</p> <p>Final Paragraph in Response: Disagree with response. These are AOCs as both ADEC and USAF have received new information regarding these sites, commitments were made in public to sample monitoring wells associated with the landfills, and USAF continues to refer to them as closed despite the fact that no closure documentation exists for the historic landfill near the runway, and the closure requirements were not fulfilled for the other two landfills. Please document the most current discussions of</p>	<p>Item 9: Accepted.</p>

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		<p>for emergency removal and should recommend the site as a disposal area for future investigations.</p> <p>4. Aerial photography (1963) provided in the 2010 EBS shows what appears to be a large drum staging area staging area west of the dike (west of B1769 approximately). This area needs to be further evaluated as the condition and contents of the drums are unknown.</p> <p>5. On a 1952 drawing provided with the PA, a disposal area is specified located outside of the perimeter dike on the northernmost boundary on western side the air station. Subsequent aerial photographs (1963) show possible disturbances in the same area. This area needs to be evaluated to determine investigative needs.</p> <p>6. A 1969 Corps of Engineer drawing shows a disposal area inside the dike west of B1769 and the location of former B1770. B1770 was a former incinerator. Due its close proximity to the</p>		<p>improper disposal practices and refer to the ERP sites and indicate the program under which they comments and discussions are being addressed.</p>	

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		<p>former incinerator, this disposal area needs to be fully investigated for contamination from the possible disposal of improperly burned materials and ash. Please indicate this in either your discussion of concerns on existing PA sites or recommend this as a new PA site.</p> <p>7. The same 1969 Corps of Engineer drawing also identifies a large disposal area further west of the dike described as a disposal area for burnable material. This site was not mentioned in the PA, nor is it an ERP site. It needs to be evaluated to determine further investigative needs.</p> <p>8. An undated Corps of Engineers drawing also identifies the Alternate "Wet Pit" Landfill as a "sludge disposal area". This is an ERP site, however the information that it was used as a sludge disposal area is new information. Further evaluation of this information should either be made a part of the PA or the recommendation should</p>			

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		<p>be made to require further investigation of the ERP site.</p> <p>9. The MMRP Phase II report surveys an area north of the Air Base where disposal and demolition activities took place. This area has been recommended for clearance for MEC related activities; however a magnetic anomaly survey was not completed. That site should be listed in the PA as a disposal site requiring further evaluation and future closure.</p> <p>Additionally, public comments made at the 2010 RAB at Galena were made by former Air Force personnel and contractors stating that it was common practice to bury drums of solvents and other substances in landfills to meet inventory inspection requirements. Additional comments referred to dumping PCB oil in disposal areas and identification of the Rocket Container Site and other sites. ADEC has evaluated the files on landfill closures and finds incomplete compliance with the agreed upon closure requirements. The Air Force subsequently agreed in those</p>			

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		<p>meetings to re-sample all monitoring wells for potential off-site migration from these landfills. A statement in this PA should reflect the ADEC recommendation and multiple BCT meetings where the team agreed that the landfills at Galena need to be re-evaluated. Closure and capping deficiencies need to be identified. Monitoring programs need to be re-initiated if necessary. Appropriate institutional controls need to be formulated and agreed upon. At a minimum they should include:</p> <ol style="list-style-type: none"> 1. monitoring wells down-gradient from the site 2. a cap evaluation 3. surveys of all new and un-surveyed landfill areas 4. identification of off-site landfills for which USAF may have liability <p>These discussions need to be documented in the PA and then the programs under which they will be implemented should be identified.</p>			

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17.		<p>The ASTs investigated in this report do not address underground pipelines or fill tubes that may be associated with these tanks. These features need to be identified and investigated as well. Please identify any ASTs with associated underground piping. Also, ensure that fill areas are thoroughly investigated as they are classic locations of contamination due to over filling and careless fuel handling procedures. Each AST should have a section commenting on whether the fill area and the connection leading from the tank require further investigation.</p>	<p>Agree. Text will be added to address identified features.</p>	<p>Response Accepted.</p>	<p>Accepted</p>
18.		<p>Absence of secondary containment at a site is not listed as a factor which indicates further investigation based on the flowchart (Figure 4-1). The flowchart should be revised to include this characteristic as rationale for further investigation.</p> <p>For example, AST 1569: Because this site is in contact with the ground, and possesses no secondary containment, this site was recommended for limited site inspection. ADEC agrees with this approach and recommends that all sites with unknown or lacking secondary</p>	<p>Agree. Figure 4-1 will be revised to include secondary containment language.</p>	<p>Response Accepted.</p>	<p>Accepted</p>

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		containment be investigated.			
19.		Please ensure all sources of historical photographs and sources for all supporting document are referenced.	Agree. References will be added for historical photographs and other supporting documentation.	Response Accepted.	Accepted
20.		The 'Recommendation' sections of the PA report suggest both "site investigation" sampling and "site inspection" sampling. If they are the same process please revise text to make recommendations uniform. If they are different methods, please define the differences in approach. This differentiation should be defined for the reader in this report even if it is already defined in the Work Plan for Site Inspection, Remedial Investigation, and Site Characterization, as this PA report needs to stand on its own.	Agree. Statements will be made uniform.	Response Accepted.	Accepted
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21.	3-9 Section 3.3.5	"The endangered peregrine falcon also inhabits the area." This species is no longer listed as endangered, it was delisted in 1999. However, it still remains protected under the Migratory Bird Treaty Act and listed as a "species of concern by the US Fish and Wildlife Service. Please revise text.	Agree. Text regarding the peregrine falcon will be revised from "endangered" to "protected".	Response Accepted.	Accepted

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22.	Evaluation Process Figure 4-1	There is a note at the bottom of this figure stating "contamination migrating from an adjacent site will be addressed as part of the adjacent (or source) site for the purpose of environmental cleanup. This note should be removed or adjusted to reflect DQO 9 (scoped at June 2010 Anchorage BCT meetings)	Agree. Text regarding contaminant migration from adjacent sites will be removed to maintain consistency with Data Quality Objective (DQO) 9.	Response Accepted.	Accepted
23.	4-5 Section 4.2.1.2	This section states that analytical data will be collected from within the site boundary. If an arbitrary boundary has been set for a site this has no impact on the site sampling requirements. This wording should also be changed to reflect the additional DQO scoped at Anchorage meetings June 28-20, 2010. Data will be collected from sites within a 500 ft radius of the site in accordance with DQO 9 (scoped at June 2010 Anchorage BCT meetings).	Agree. Text will be changed from "site boundary" to "potential source areas located within the site boundary, with consideration of potential source areas located within 500 feet of the site boundary".	Response Accepted.	Accepted
24.	4-6 Section 4.2.1.4	Third Bullet. The last sentence in this bullet should be another separate bullet. Bullet three addresses sites <i>without</i> adequate data. The last sentence in this bullet suggests steps for sites <i>with</i> adequate data, therefore it should be separated.	Agree.	Response Accepted. Please reflect this change in text.	Accepted

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25.	5-2 Section 5.0	The table provided in the section has no name or number associated with it. Please provide a designation for this table. This aids in referencing back to this table for information in the future.	Agree.	Response Accepted. Please reflect this change in text.	Accepted
26.	Figure 6-1	Consider splitting this figure into more than one figure. The figure provides useful information but cannot be read or used as it is currently presented	Agree. Figure will be split into the following two figures: <ul style="list-style-type: none"> • Figure 6-1, Recommended Pathways for SC and RI Sites • Figure 6-2, Recommended Pathways for PA Sites 	Response Accepted.	Accepted
27.	6-1 Section 6.0	Consider listing the sites by name in this section. For example, rather than just stating that “2 sites were recommended for No Further Action”, state which two sites had this recommendation. This would aid the reader by providing a more clear understanding of what is being recommended in this report.	Agree. Site names will be added.	Response Accepted.	Accepted
28.	AST 1428 Site Description and History	Missing information from the site history is that B1428 is eligible for National Registry (2010 EBS, page 66). This may be important to note for future remediation activities that may occur at this site, and may be affected by this status.	Agree. National Registry information will be added to the Site Description and History section.	Response Accepted.	Accepted
29.	AST 1428 <i>Historical record</i>	“The dissolved phase plume appears to be expanding, although it’s not clear whether this is due to	Disagree. The information presented is related to the presence of the large co-mingled groundwater plumes that underlie	Disagree with Response.	Clarification – No release has occurred from AST Site 1428.

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	<i>review</i>	<p>the Fill stands source area or an additional source from Building 1428 (AST at warning hangar may have had a prior release)". (2004 San Antonio meeting notes)</p> <p>This information was found during a historical record review and search pertaining to this site. The information presented in the meeting notes suggests a possible release from the ASTs at building 1428. This information was not included in the site description in the PA report.</p>	<p>the western portion of the Former Galena FOL (including Site AST1428). The dissolved phase plume is being addressed under an FOL-wide program. The described "expanding" status of the large-scale plume is not considered an indication of a release from an individual small site overlying it.</p>	<p>The known source areas do not account for the plume and the plume behavior described in these detections. Therefore it is important to refer to this as evidence of additional source areas which may need to be investigated.</p>	<p>Two inactive ASTs are located inside the Mechanical Room of Building 1428. Both ASTs have secondary containment. Tank capacities are only 275 gallons and 25 gallons. During site visits in 2009 and 2010, both ASTs appeared to be in good condition and no surface staining or petroleum odors were observed. The text has been updated to reflect this information.</p> <p>A 10,000 gallon UST abandoned in place, is located just outside the mechanical room. This UST is a potential source of contamination in the area around B1428, and is being investigated as Site UST 1428.</p>
30.	AST 1428 Recommendation	This site is recommended as a 'non-site'. However there are no photographs provided of the area in which the AST was located included	Agree. Current photographs of the CAC mechanical room will be added to the PA.	Response Accepted.	Accepted

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		<p>in the PA. The 2010 EBS has the status of AST 1428-3 as 'Inactive', not 'Removed' as in the PA. The 2008 EBS lists its status as 'Active'.</p> <p>Since no removal records are available and there is not concurrence about current status of the AST, it would be helpful to include a photograph of the suspected area of this tank. This would accomplish the following:</p> <ol style="list-style-type: none"> 1. Confirmation of the status of the tank as 'Removed'. 2. This would also add visual evidence as to whether or not a release had occurred at this site. 3. It would also provide evidence of the integrity of the building as an adequate SCA since AST 1428-3 did not have an integrated containment feature. 			
31.	AST 1552 Site Description and History	<p>The PA lists the capacity of AST 1552-1 as 100 gallons the 2010 EBS lists this tank's capacity as 1,000 gallons. Also 1552-2 is listed in the PA as 1,000 gallons; the 2010 EBS lists AST 1552-2's capacity as 175 gallons. The tank names and their capacities for this site should be confirmed.</p> <p>Also, the PA states "Only AST 1552-1 is listed in Table 3-1 of the 2008</p>	Agree. The tank names and capacities from the various data sources will be resolved.	Response Accepted. Please reflect this change in text	Accepted

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		EBS report; therefore the status of AST 1552-1 after 2004 is unknown". This sentence is confusing. Is this a typo; should one of the AST 1552-1s in the sentence read AST 1552-2? Please clarify the meaning of this sentence.			
32.	AST 1552 Recommendation	<p>This site is recommended as a 'non-site'. However the condition of AST 1552-1 is listed in the PA as 'unknown'.</p> <p>Under some circumstances, a site reconnaissance may not be necessary. If file searches yield sufficient information to indicate that a Site Investigation is necessary, a reconnaissance may not be required to complete the PA. It is usually difficult, however, to conclude that a site is a non-site or no further action is necessary without the benefit of actually observing the conditions at and/or around the site.</p> <p>Please ascertain the condition of AST 1552-1.</p>	<p>Agree. Aboveground storage tank (AST) 1552 is associated with the Airfield Lighting Building (also called the airfield lighting vault). Access inside the building is limited because it is an active facility. An attempt will be made in 2011 to investigate the interior of the building to confirm the status of the AST.</p>	<p>Coordination with the current owner of the building, AKDOT P&F to obtain building access is a reasonable requirement of a PA investigation. Please also include a current photograph of the AST inside B1552.</p>	<p>Agree – A current photograph of the AST located inside the building has been added.</p>
33.	AST 1568 Site Description and History	<p>The PA lists the status of Building 1568 as vacant. However, the 2010 EBS states its status as "remediation support".</p> <p>"Small quantities of hazardous materials (i.e., paints, adhesives, lubricants, and compressed gases) are currently stored within Building</p>	<p>Agree. The text will be revised to reflect that Building 1568 was demolished in 2010 and its contents, including small quantities of hazardous materials, were disposed of in accordance with applicable requirements.</p>	<p>Response Accepted.</p>	<p>Accepted</p>

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		1568 in support of Air Force remedial investigations/actions.” (2010 EBS) Please revise the text to reflect the current status of B1568.			
34.	AST 1568 Supporting Documentation	The pictures presented in this section are of the ASTs while still at B1850. There are no photographs provided of the tanks’ location at B1568. Photographs of the tanks at their former location do not verify the integrity of the tanks after transport to B1568. Photographs of the tanks at their current location should be included in the supporting documentation. Also, the PA states there are 2 ASTs associated with Building 1568, but there are photographs of 3 different ASTs at B1850 included in the supporting documents. Please identify which are of the pictured ASTs are the ones of concern.	Agree. If possible, photos of the tanks at their current location will be included. Photos will also be clarified.	Please explain Comment Response. Why would it not be possible to obtain photographs of the tanks? If tanks are no longer in place at B1568 please include photographs of the location the tanks were placed.	Agree – Current photographs of the tanks have been added.
35.	AST 1568 Supporting Documentation	What is the significance of the photograph of B1851 (the Gymnasium) that is included in this section?	Agree. The supporting documentation is pages from the EBS report, which presents two photographs per page. The relevant photo is #53, the AST. Photo #54 will be cropped from the supporting documentation.	Response Accepted.	Clarification – Photographs of the ASTs were taken during a follow up site visit in November 2010. These updated photos have replaced the photograph taken from the EBS report.

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36.	AST 1568 Recommendation	<p>This site is recommended as a 'non-site'. However the condition of tanks at AST 1568 is listed in the PA as 'unknown'.</p> <p>Under some circumstances, a site reconnaissance may not be necessary. If file searches yield sufficient information to indicate that a Site Investigation is necessary, a reconnaissance may not be required to complete the PA. It is usually difficult, however, to conclude that a site is a non-site or no further action is necessary without the benefit of actually observing the conditions at and/or around the site.</p> <p>Please ascertain and document the condition of the tanks at AST 1568.</p>	Agree. The condition of the tanks at Site AST1568 will be documented.	Response Accepted.	Accepted
37.	AST 1572 Recommendation	<p>It does not appear that this AST is situated on a concrete pad. No spills have been reported from this site, but due to lack of secondary containment, sampling related to a JP-8 release should to be done in order to confirm the absence of contamination from this source. Lack of secondary containment at these ASTs should mandate further investigation or documentation. Please include confirmation of secondary containment or recommendation for a limited site inspection.</p>	<p>Disagree. These tanks were installed to meet AST inspection requirements, thus they are elevated and all sides are visible. A visual site inspection (VSI) of the concrete and surrounding ground is sufficient to determine if a spill occurred. An SI is only warranted if evidence of a spill is identified during the VSI or if the AST cannot be visually inspected.</p>	<p>Response Accepted.</p> <p>Please include this rationale in the text.</p>	Accepted – Text has been updated.

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38.	AST 1573 Record Review	Three documents were found referring to the site. "Draft 2008 Site Characterization Data for Galena Airport, AK" was one of the documents listed. This document has information pertaining to the exact location of the AST on the northern side of the building. However it is using this information to delineate the plume from ERP Site ST009, and does contain data. This information should be noted as a reference.	Agree. A reference to document will be added to the PA.	Response Accepted.	Accepted
39.	AST 1578 Site Description	The 2010 EBS identifies a tank at B1578 as containing lead based paint. This information is missing from the Site Description. Identification of the tank that utilized lead based paint should be performed and a determination if this paint has caused additional site contamination should be made. Please identify if lead is a COC for soil or water media at this site. This will ensure proper documentation for site closure and future use.	Partially Agree. Text will be added to the PA that states the Final EBS identified LBP at the site. However, as discussed during the June/July 2010 Work Plan scoping meetings, the USAF does not include lead as a target analyte based on the presence of LBP. The following text will be added to the Target Analyte section: "Lead is not a target analyte in any media based on the use of lead based paint at the site."	At these sites there is a need to differentiate a 'release' from a 'disclosure'. For example: If lead paint was present that is not evidence of a release; that would only require a disclosure. However if lead paint was flaking, that is evidence of a release and must be investigated under 18 AAC 75. Therefore in order for LBP to not be a contaminant of concern please document the condition of the paint at the site. If the paint was flaking, then lead	Clarification - Lead based paint will not be included in this PA. The Air Force will address this issue with ADEC separate from the PA.

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				should be added to the target analyte list at the site.	
40.	AST 1578 Recommendation	There are three tanks and one removed tank in addition to the active ASTs associated with this site. The status, dates of operation, and conditions of these tanks is listed as unknown. Due to the lack of sound information about these ASTs, sampling at this site should be done for proper thoroughness to assure contamination associated with these ASTs was not overlooked. Please recommend this site for site inspection. Target analyte lists should be specific to MOGAS, JP-8, diesel, and MUR as these are the reported contents of the ASTs known to have existed at this site.	Disagree. The location of these tanks could not be determined. Because the facility and the surrounding land is a concrete pad, a VSI for staining is sufficient for the PA.	Disagree with response. This site should be recommended for SI. Please include a review of the construction diagrams for this facility if locations of the ASTs cannot be identified on aerial photographs. As per Worksheet 17, if the locations of the ASTs still cannot be determined to guide discrete sampling, MI sampling should be proposed.	Partially Agree – Construction diagrams for the facility have not been located. Drawings of the waste water system are hanging on the wall of the facility and photos are included in the supporting documentation Additional research has been conducted for this site. Based on historical records, historical photographs, the building drawings and an interview with the Plant Operator, the site has only two locations where former and/or current fuel containing ASTs have been located. These locations have been visually inspected and no indication of a release has been

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					observed. An SI is therefore not warranted. The text has been updated to reflect this information.
41.	AST 1768 October 2009 Site Visit Observation	The description given for this the site from the 2009 Site Visit Observations states that the AST "...may contain a large hole near the bottom of the tank." It would appear from the picture that this hole evident. Please revise text to reflect the confirmation of the existence of this hole.	Agree. A similar comment was made on the FSP for Site AST1768. During an onsite investigation by field staff in July 2010, the area of the AST thought to be a hole was observed to be scaling paint. The PA text will be updated accordingly.	Response Accepted.	Accepted
42.	AST 1768 Target Analytes	Please update the target analytes at this site to conform to waste oil/used oil analysis.	Agree. The target analytes will be revised to be consistent with the approved list in the approved Final FSP for Site AST1768.	Response Accepted.	Accepted
43.	AST 1772 Recommendation	This site is recommended as a 'non-site'. However the condition of tanks at AST 1772 is listed in the PA as 'unknown'. Under some circumstances, a site reconnaissance may not be necessary. If file searches yield sufficient information to indicate that a Site Investigation is necessary, a reconnaissance may not be required to complete the PA. It is usually difficult, however, to conclude that a site is a non-site or no further action is necessary without the benefit of	Disagree. As described in the Site Description and History section, the AST has been removed. In addition, there were no documented releases from the AST and no visible evidence of a release was observed during the October 2009 site visit.	Disagree with response. The site visit was not adequate for a Visual Site Inspection (VSI) as the location of AST1772, inside B1772, was not inspected. Visual inspections at the locations and former locations of ASTs have been	Agree – The interior of Building 1772 was inspected in May 2011. No evidence of a release was observed. The integrity of the building was observed to be adequate as secondary containment for the former AST. The text has been updated and a photo of the

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		<p>actually observing the conditions at and/or around the site.</p> <p>Please ascertain and document the condition of the AST at AST 1772 and verify the building's status as an impermeable SCA for the AST.</p>		<p>performed and/or agreed to at the other interior AST locations. This methodology should also be carried forward to this site as well.</p> <p>Since no removal records are available, it would be helpful to include a photograph of the former operating area of this AST. This would accomplish the following:</p> <ol style="list-style-type: none"> 1. This would also add visual evidence as to whether or not a release had occurred at this site. 2. It would also provide evidence of the integrity of the building as an adequate SCA since it is unknown if AST1772 had an integrated containment feature. <p>Please include a visual</p>	<p>interior of Building 1772 has been added.</p>

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				inspection of the inside of B1772.	
44.	AST 1850 General	<p>The PA states that no releases have occurred from ASTs at AST 1850.</p> <p>Historical records were reviewed and statements in contrast to this claim were found:</p> <ol style="list-style-type: none"> 1. The 2010 EBS states: "The AST in the storage yard of Building 1768 and the AST in the storage yard of Building 1850 are inactive and have the potential for past releases; therefore, these ASTs are also considered Category 2." 2. The 2010 EBS also states under the heading: <u>Incomplete Findings and Data Gaps heading</u>: "Four ASTs (two at Building 2000, one in the storage yard of Building 1768, and one in the storage yard of Building 1850) have evidence of petroleum staining or have the potential for a petroleum release. Additional investigation should be conducted to confirm a release has not occurred." <p>Due to this report, and the actuality that there has been no prior investigation performed, this site should be recommended for a site investigation prior to its</p>	<p>Agree. Investigations for possible past releases from the tanks is included in Site S1850. The text will be updated to make this clear to the reader. Also, a discussion of a soil gas survey performed in the storage yard specifically to identify locations of petroleum releases will be added to the text.</p>	<p>Please clarify response.</p> <p>It is understood that the investigations regarding the ASTs mentioned in the comment will be carried forward in the FSP for S1850.</p> <p>However, please also clarify in the PA if AST1850 will be investigated under S1850.</p>	<p>Clarification – The investigations of potential releases from ASTs located within the storage yard will be carried forward in the FSP for S1850.</p> <p>The text has been updated to state that "Potential spills to soil from waste storage and previously removed ASTs located within the Building 1850 storage yard, including AST 1850, are addressed in Site S1850."</p>

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		consideration for 'non-site' classification.			
45.	AST 1854 October 2009 Site Investigation	The text states that photographs of AST 1854 and 1854-1 are provided, however this is the first mention of AST 1854-1. This is most likely a typo and meant to read 'AST 1854 and AST 1854-2 are provided'. Please revise text to assure the appropriate names of the ASTs are used.	Agree. Text and figures will be reviewed for accuracy of AST naming.	Response Accepted. Please reflect the changes in text	Accepted Text has been updated.
46.	AST 1854 General	There is conflicting information provided in the narrative. The text under the Site Description and History section, AST 1854 is the outdoor AST, and AST 1854-2 is the interior AST. The photographs provided of the ASTs have the names of the tanks reversed. Please revise text to assure the appropriate names of the ASTs are used.	Agree. Text and figures will be reviewed for accuracy of AST naming.	Response Accepted. Please reflect the changes in text	Accepted Text has been updated.
47.	AST 1854	For this site, the building is considered an impermeable SCA. In order to substantiate this claim, proof of the integrity of the building should be included in the PA. (Photographs of the floor, walls, documentation stating the integrity of the building, etc.) Since there is a documented spill of an unspecified amount from an unspecified tank at this location, in order to consider this a 'non site' the SCA of the interior AST needs to be better	Agree. Photos of the room where the AST is located will be provided to support the integrity of the building as providing source control/removal action (SCA).	Response Accepted.	Accepted

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		documented. Please provide proof of integrity of the SCA for AST 1854. If the containment provided by the building is not adequate then please recommend sampling to investigate whether contamination from this spill has affected the subsurface areas around and under the building.			
48.	AST 1858 General	<p>A data gap identified in the 2010 EBS stated:</p> <p>“Further evaluation should be conducted at suspected <i>UST</i> locations associated with Buildings 400, 1429, 1769, and 1858. These locations are suspected of containing USTs based on the function and description of the building that has been modified/demolished; however, confirmation of their existence has not yet been determined.”</p> <p>The table “Comparison of Site Listed in the EBS and the Draft PA” list EBS site UST 1858 as PA site AST 1858. There is no validation for this change provided in the narrative of the PA report. Please identify why there is an inconsistency between PA report and the 2010 EBS.</p>	Disagree. The USAF Form 1431 provided in the supporting documentation indicates the 500-gallon tank transferred from Building 2124 to Building 1858 was aboveground (“AG”). Text will be added that notes the discrepancy with the 2010 EBS.	Response Accepted.	Accepted
49.	AST 1859 Recommendation	<p>This site is recommended as a ‘non-site’. However the condition of AST 1859-3 is listed as ‘unknown’.</p> <p>Under some circumstances, a site</p>	Agree. The condition of AST 1859-3 will be provided.	Response Accepted.	Accepted

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		<p>reconnaissance may not be necessary. If file searches yield sufficient information to indicate that a Site Investigation is necessary, a reconnaissance may not be required to complete the PA.</p> <p>It is usually difficult, however, to conclude that a site is a non-site or no further action is necessary without the benefit of actually observing the conditions at and/or around the site.</p> <p>Please ascertain and document the condition of AST 1859-3.</p>			
50.	AST 2000 Site Description and History	<p>The 2010 EBS identifies that the engine and pump at this site contain lead based paint. This information is missing from the Site Description. The PA reports the conditions of the building's foundation as poor, and that the ground beneath the building could have been impacted by contamination. Due to both of these factors, determination if this paint has caused additional site contamination should be made. Please identify if lead is a COC for soil or water media at this site. This will ensure proper documentation for site closure and future site use.</p>	<p>Partially Agree. Text can be added to the PA to state the Final EBS identified LBP at the site. However, as discussed during the June/July 2010 Work Plan scoping meetings, the USAF does not include lead as a target analyte based on the presence of LBP. The following text will be added to the Target Analyte section: "Lead is not a target analyte in any media based on the use of lead based paint at the site." Target analytes for Site AST2000 will be consistent with the list in the approved Final FSP for Site AST2000.</p>	<p>Please see DEC Reply to Comment Response #39</p>	<p>Clarification - Lead based paint will not be included in this PA. The Air Force will address this issue with ADEC separate from the PA.</p>
51.	AST 77506 Recommendation	<p>The site has been active since 1966, there is no SCA, the contents of the tanks are not accurately known, and there have never been any</p>	<p>Disagree. The tanks contained de-icing fluid both when they were located in ERP Site ST005 and when they were relocated to</p>	<p>Response Accepted.</p>	<p>Accepted</p>

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		investigations done at this site. Even though there are no documented releases, the combination of these factors constitutes justification for further investigation at this site. Please recommend this site for site inspection and sampling, and develop a target analyte list specific for the contents of the tanks and the uses at this site.	their current position.		
52.	AST 77506 Figure A4	The digital date on this picture is 2003. The picture citation states this picture was taken during the 2009 site visit. This information conflicts. Please revise the photograph's citation, or provide information as to why the date on the photograph conflicts with the date the photograph was actually taken.	Agree. The photo was taken in October 2009, but the photographer was unaware at the time that the camera had the wrong date settings. Text will be added that states the digital date on the photograph is incorrect.	Response Accepted.	Accepted
53.	UST 1400 Recommendation	It is recommended to conduct limited sampling for fuel related contamination. However also included at this site are 2 abandoned in place glycol tanks which have no associated sampling recommended. Please revise the target analyte list to also reflect sampling for contamination from the abandoned glycol tanks as well.	Agree. The recommendation section will be revised to include an SI investigation of the glycol tanks. The text will be revised to reflect the target analytes, consistent with the approved list in the approved Final FSP for Site UST1400.	Response Accepted.	Accepted
54.	UST 1400 Site Characteristics	B1400 was identified in the PA as having an associated septic system. This septic system should be considered a separate site from UST 1400. Because septic systems are	Partially Agree. The recommendation section will be revised to be consistent with the approved Final FSP for Site UST1400. The text will be revised to include an SI investigation of the septic system with the	Response Accepted.	Accepted

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		historical sources of contamination due to improper disposal practices they may require a more involved assessment. The PA does recommend target analytes for the septic system, but these were not carried over into the recommendation section of the report. Please identify the septic system associated with B1400 as a separate site, and develop an appropriate target analyte list for a site inspection.	approved target analyte list for the site. A new site will not be created for investigation of the septic system.		
55.	UST 1401 Record Review	Six documents were found pertaining to the site. One of the documents that were found was not referenced in the PA, and it contained useful information. The name of the document is 860.38.015 Galena AFS-Airport Bldgs 1400 & 1401 USTs\1994 April - DEC Ltr on USTs 1400_1401.pdf . This document is correspondence between the DEC and the AF. This letter states that further sampling at this site is required by the DEC. This information should be included in the PA report.	Agree. The text will be updated to include this information.	Response Accepted.	Accepted
56.	UST 1428 Target Analytes	The USTs located at the western corner of the building have the possibility of containing glycol. Please add glycol, RCRA metals, and VOCs to the target analyte list for this site.	Agree. The Target Analyte section will be revised to be consistent with the approved list in the approved Final FSP for Site UST1428.	Response Accepted.	Accepted

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57.	UST 1404 General	The 2010 EBS identified that the generator used at this site prior to its demolition contained lead based paint. This information was not included in the Site History and Description. Determination if this paint has caused additional site contamination should be made. Please identify if lead is a COC for soil or water media at this site. This will ensure proper documentation for site closure and future use	Partially Agree. Text can be added to the PA to state the Final EBS identified LBP at the site. However, as discussed during the June/July 2010 Work Plan scoping meetings, the USAF does not include lead as a target analyte based on the presence of LBP. The following text will be added to the Target Analyte section: "Lead is not a target analyte in any media based on the use of lead based paint at the site."	Please see DEC Reply to Comment Response #39	Clarification - Lead based paint will not be included in this PA. The Air Force will address this issue with ADEC separate from the PA.
58.	UST 1428 Record Review	Three documents were found pertaining to this UST. The first two mention the location while the third is a site characterization report. This report is not referenced in the PA: 860.38.002 Galena AFS-Airport Million Gallon Hill\Draft 2008 Site Characterization Data.pdf . This document should be reviewed for significant information pertaining to this site.	Agree. The document will be reviewed and added to the reference section. The text will be revised if additional information relevant to the investigation is presented.	Response Accepted.	Clarification – The cited report was reviewed. An area south of B1428 is presented in the report, but no information relevant to UST Site 1428, located north of B1428, is presented in the report. Therefore, the document was not included as a reference.
59.	UST 1770 Figure A4	The digital date on this picture is 2003. The picture citation states this picture was taken during the 2009 site visit. This information conflicts. Please revise the photograph's citation, or provide information as to why the date on the photograph conflicts with the date the	Agree. The photo was taken in October 2009, but the photographer was unaware at the time that the camera had the wrong date settings. Text will be added that states the digital date on the photograph is incorrect.	Response Accepted.	Accepted

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		photograph was taken.			
60.	UST 1770 Target Analytes	As agreed to during the June 2010 Base Cleanup Team meetings in Anchorage, please update the target analytes for this site to include waste oil analysis.	Agree. The target analytes will be revised to be consistent with the approved list in the approved Final FSP for Site UST1770.	Response Accepted.	Accepted
61.	UST 1770 Record Review	Record review located a document that is referenced in the PA, however the date of this report conflicts. The PA states that date of the document is February 1999, while the database states the date of the document is October 2001. 860.38.001 Galena AFS Vehicle Maintenance\2003 RI Site Summary DDT Soils CS001\Appendix A\Remedial Action Report Oct 1999.pdf . Please investigate and revise with correct date if necessary.	Agree. The publication dates were investigated. There are final two documents provided in ADEC electronic files: 1) Remedial Action Report, dated October 9, 2001 2) Remedial Action Report Addendum, dated October 12, 2001 The February 1999 document referenced in the PA is the draft of the October 9, 2001 document. The draft document reference will be replaced with a reference to the final document.	Response Accepted.	Accepted
62.	UST 1859 Geophysical Surveys / Conclusions	There are no records of removal for this UST, and the geophysical survey did not cover the suspected location of the USTs. The only confirmation of removal is personal communication with the contractor. Details of this conversation are not included in the PA, only documentation that the communication occurred. An investigation should be performed at the site of the USTs to determine if it is still present in the ground or removed. If the location of the	Agree. The text will be revised to include components of the SI investigation consistent with that included in the approved Final FSP for Site UST1859.	Response Accepted.	Accepted

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		removed tank can be determined accurately then a sampling plan specific to the use of this UST should be prepared.			
63.	UST 15783 General	According to the 2010 EBS Water Well #7 (potable) is located inside B1578. There is confirmed contamination at this site, but the potable water well is not mentioned at all in the PA. This is a matter of concern, and should be a high priority. Measures should be taken to ensure the water supply from this well is not being affected by the surrounding contamination. Additionally, vicinity of base water supplies and protective measures that are in place to ensure their safety should be detailed in the site descriptions.	Agree. Water Well (WW) 7 will be added as a site feature and a discussion of analytical data from the well will be added to the text. The text will be consistent with that presented in the approved Final FSP for Site UST15783. The need for further protective measures for existing potable water supply wells will be based on the determination of the nature and extent of groundwater contamination per the Groundwater OU FSPs. The USAF has already installed an air stripper as part of the current water treatment system as an interim protective measure pending completion of the investigations.	Response Accepted. Please provide this rationale in the text.	Accepted
64.	UST 1578-3 General	The 2010 EBS identified that a tank used at this site contained lead based paint. The tank that utilized lead based paint should be identified. This information was not included in the Site History and Description. Determination if this paint has caused additional site contamination should be made. Please identify if lead is a COC for soil or water media at this site. This will ensure proper documentation for site closure and future use	Agree. Text can be added to the PA to state the Final EBS identified LBP at the site. However, as discussed during the June/July 2010 Work Plan scoping meetings, the USAF does not include lead as a target analyte based on the presence of LBP. The target analytes will be revised to be consistent with the approved list from the approved Final FSP for Site UST15783, which includes lead on the basis of the presence of leaded gasoline.	Please see DEC Reply to Comment Response #39	Clarification - Lead based paint will not be included in this PA. The Air Force will address this issue with ADEC separate from the PA.

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65.	OWS 1573 Recommendation	<p>The PA refers to an “unauthorized discharge to sanitary sewer” from this OWS. There are no details provided about this incident and the personal communication that identified this incident is not included in the PA. The quantity, the date, the contents, the number of occurrences, and if clean up actions were taken at the time of the unauthorized discharge are all unknowns. It is also stated that improper use and maintenance of the OWS are causative factors in an unauthorized discharges. The combination of unknowns about the discharge incident, as well as the history of improper use and maintenance of OWS 1573, and lack of prior sampling makes site investigation the next appropriate step at this site.</p> <p>Additionally, the 2010 EBS identified this site as an area that needed additional information:</p> <p>“Although no evidence of a release was identified for the active OWS at Building 1573, sampling should be conducted to confirm a release has not occurred from past operations.”</p> <p>A site investigation, including sampling for fuel and waste oil constituents, PCBs, and pesticides should be performed at OWS1573 and the associated sewer, settling</p>	<p>Disagree. Although details regarding the described incident are unknown, the release was known to be to the sanitary sewer system, not to the ground surface. Therefore, no impacts to the surrounding soil are expected.</p> <p>Text will be added that references the statement in Section 3.3.4.1 of the 2010 EBS: “Although no evidence of a release was identified for this OWS, the integrity of the OWS cannot be confirmed without sampling; therefore, the OWS is considered Category 7”. Category 7 designations in the EBS are areas not evaluated or that require additional evaluation. As described in the October 2009 Site Visit Observations, the OWS includes both cathodic protection and an electronic leak detection system. Therefore, the OWS is considered to be of good integrity.</p>	<p>Response Accepted.</p> <p>However, please identify in text what investigation is being planned for the sanitary sewer, or explain why an investigation of the sanitary sewer is not necessary.</p>	Accepted

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		<p>pond, treatment area or leach field prior to consideration for non-site designation. Associated piping and treatment areas may need to be handled as separate sites or they may already be part of other investigation efforts. If additional work is required on these structures or areas due to releases from this site then the PA should recommend that work and identify the new areas requiring investigation.</p>			
66.	OWS 1833 Target Analytes / Recommendation	<p>The list of target analytes presented for this site suggests a multi-chemical analysis approach will be taken with regards to this site. In contrast, the recommendation section suggests that limited sampling be performed at this site. Because this site appears to be a drain for the building, the target analyte list should be updated to include PAHs and other contaminants typical of OWS or injection wells. The use of the building should be documented sufficiently to develop a recommended COPC list.</p> <p>Please clarify text in recommendation section to better correspond with the target analyte</p>	<p>Partially Agree. The recommended limited SI sampling at the site references the number of soil boring locations/samples needed to confirm the presence or absence of a release at the site.</p> <p>The multi-chemical target analyte list (which will be revised to be consistent with the approved list in the approved Final FSP for Site OWS1833) is warranted on the basis of unknown disposal activities.</p>	Response Accepted.	Accepted

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		list.			
67.	OWS 1845 Target Analytes	<p>“The Final EBS 2010 states: OWSs that were used at Buildings 1499, 1556, 1700, 1837, and 1845 have been removed. Sampling around these OWSs at the time of removal identified varying levels of contaminants (e.g., benzene, Gasoline Range Organics (GRO), and Diesel Range Organics [DRO]) in the soil. However, there may be other contaminants of potential concern (e.g., solvents, metals) present from past OWS use. Therefore, these OWS are considered Category 7.” (Page 3-25 para. 1)</p> <p>This is in contrast to the statement made in the PA that “...no records of the OWS or soil release verification samples have been located.” Additional records searches may be relevant. Please assure all relevant historical information has been reviewed for this site.</p>	Agree. Text in the Site Description and History and Summary of Previous Investigations sections will be revised to be consistent with that in the approved Final FSP for Site OWS1845.	Response Accepted.	Accepted
68.	OWS 1845 Record Review	<p>There were 37 documents found to pertain to this site. The documents that are most pertinent are as follows: 860.38.001 Galena AFS Vehicle Maintenance\2003 RI Site Summary DDT Soils CS001\Appendix A\August 5 1994 Memo.pdf This document has data and background information on the site and samples that were analyzed</p>	Agree. The record review will be updated to be consistent with that in the approved Final FSP for Site OWS1845.	Response Accepted.	Accepted

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		<p>for EPA 8020, which is contradicting the PA. However it is to note that it is not mentioned if this sampling was directed directly for Building 1845 or ERP Site ST009. Most samples were also analyzed for EPA 8080 as well.</p> <p>860.38.005 Galena AFS-Airport - Sitewide\EPA's 2002 review of Galena.pdf This document issued by the EPA states that further sampling needs to be done at building 1845 due to the high level of TCE and potential contamination to the groundwater, supply wells, and migration to the Yukon River. This does not really disagree with the PA, but it is another source saying that a further investigation is needed.</p> <p>860.38.001 Galena AFS Vehicle Maintenance\2003 RI Site Summary DDT Soils CS001\Appendix A\EMR #7\Appendices\AppendixC\Mar292\1845trend.xls</p> <p>This document is data for the MW at Building 1845 with Mann-Kendall Trends for Benzene.</p> <p>The rest of the documents do not directly pertain to this site.</p> <p>Previously B1845 was thought to be the source of the TCE area. As a result, there are many documents addressing this location. B1845 is no longer considered the source of the TCE area, which is now being</p>			

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		investigated under ERP site SS06. Therefore many of the documents investigating SS06 may also contain information and data elements pertinent to the investigation of OWS1845. It is important that these documents also be reviewed for the preliminary assessment of this site. Please evaluate these documents for additional information related to OWS 1845 prior to the site investigation.			
69.	OAP References Section	Please verify that the date of the Northwind reference presented in this section is correct.	Agree. The reference date will be verified.	Response Accepted.	Accepted
70.	OAP General	Please document the records that exist regarding the decommissioning of this pipeline. Where those records are deficient, recommend an investigative approach to determine how this pipeline was decommissioned, whether it still contains oil, and whether there are areas that were likely to have been impacted from historic releases.	Agree. The PA will be revised to incorporate elements of the approved Final FSP for Site OAP.	Response Accepted.	Accepted
71.	PIPE Site Description and History	Missing information pertinent to the site: (From 2010 EBS) “... In 2006 drillers nicked the pipeline causing a 47 gal spill.” “In the mid 1960s the transfer pipeline from the barge load/unload area leaked diesel fuel at this site. An estimated 20,000-30,000 gallons	Agree. The dates of operations at Site PIPE will be added to the text to eliminate confusion regarding historic spills and the related Site OAP, old abandoned pipeline. The 2006 spill and the cleanup of the spill will be added to the Site PIPE history.	Response Accepted. However, please include in the narrative which program will investigate each of the spills related to the pipeline.	Accepted Text has been updated to discuss the investigation of previous spills.

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		<p>leaked. Investigation of the site determined that contamination is not likely to pose a risk to human health or the environment.”</p> <p>“A release of diesel fuel from the pipeline reportedly occurred here in 1984.”</p> <p>This is not consistent with the claim in the PA that there has been no release from PIPE.</p> <p>The PIPE description does not include recent releases or sufficient information to differentiate historical releases that may be found in the future from current or new releases from this pipeline. There are no dates of operation or installation presented in the site history. A more thorough description of the history of this site needs to be presented. Additionally, further investigation into the possible releases from this site need to be conducted. As this is a very large structure it may be necessary to separate the investigation into several zones or smaller areas in order to facilitate tracking any releases that are documented or discovered in the future.</p>	<p>The 1960s era spill is currently being addressed as ERP Site ST003, as specified in Section 3.3.3.3 of the 2010 EBS quoted in the comment.</p> <p>The 1984 spill is currently being addressed as ERP Site ST010, as specified in Section 3.3.3.3 of the 2010 EBS quoted in the comment.</p>		
72.	ILS8 Record Review	One document directly pertains to ILS8 and the equipment that was left behind after the Air Force transferred ownership of the	Disagree. While reference to the document is appreciated, the document reference doesn't provide additional information to support the evaluation of potential releases	Response Accepted.	Accepted

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		property. This document should be used as a resource because it states the ownership and responsibility of the equipment uncertain. This document is <u>860.38.003 FAA-Galena Airport\FAA Materials as of 1-2009\Galena_(GAL)\BRAC\Galena.pdf</u>	to the environment and therefore is not applicable to the PA site write-up.		
73.	TACAN	The source of power for this site could not be identified in the site records. However, there was an AST located at this area that was described as “integral to the unit”. There is still question regarding the historical activities at this site and combined with the lack of prior investigation, it is recommended sampling this site to confirm lack of contamination prior to considering this a ‘non-site’. The sampling should include fuel constituents, PCBs, and solvents as these contaminants are commonly found at other similar sites.	Agree. After the Draft PA was issued, additional historical photographs were provided by the Federal Aviation Administration (FAA). The tactical air navigation (TACAN) equipment is visible in the photograph. A limited SI will be recommended for fuels and PCBs consistent with the approach to Sites AST1569, AST1875, B3205 and B3005. Solvents would not be considered target analytes for this site in accordance with Figure 15-1. However, all soil samples collected for fuels analyses are screened for trichloroethene (TCE) and tetrachloroethene (PCE) during the investigation.	Response Accepted.	Accepted
74.	SWQ October 2009 Site Visit	The PA states that there were several crushed drums seen at this area. However it does not state what the contents of these drums were. Also “several” is not quantified. There are no pictures or estimates to help quantify this finding. In contrast with the PA claim that there is no evidence that it was used for disposal, historical evidence pointed	Partially Agree. The text will be modified to be more specific regarding the October 2009 site visit. Sampling was not required at other locations where drums are buried in and around the dike road because the entire dike is constructed of drums.	Disagree with response. The response is not entirely accurate. The dike was made out of drums, but it was washed away and then rebuilt. It is true that drums still remain in the	Clarification – The 2001 Perimeter Dike Drum Decision document was reviewed. Although sampling was required around the dike, this was because drums

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		<p>to this area and crushed drum debris were found at the site. Since this site has had no previous investigations, sampling should be done to prove out contamination before it is considered a non site.</p> <p>Additionally, the close vicinity to the Incinerator suggests this may have been used as an area in which partially burned materials and ash were dumped. This disposal area needs to be fully investigated for contamination from the possible disposal of improperly burned materials. Site investigative target analyte lists should be revised to reflect this. The notation "non-burnable" found on base planning documents for this disposal area further supports this.</p>		<p>dike, however most of it was re-constructed out of dirt.</p> <p>Additionally, DEC <i>has</i> required sampling of the entire dike in the past. The 2001 Perimeter Dike Drum Decision document references the 57 soil gas samples and 10 soil samples collected and analyzed from the dike road.</p> <p>Also, as per the 2001 Decision Document: "The USAF will remove all drums, associated with Air Force activities at Galena Airport...This remedy will include collection and disposal of the drums, collection and disposal of any hazardous material in the drums, and removal of any soil contaminated by hazardous material that has leaked from the drums. The USAF did a drum sweep in 2008, the same process should be followed for all new discoveries.</p> <p>Further, the last part of</p>	<p>containing wastes were located around the dike. No drums with waste products have been located at Site SWQ. A few crushed drums were observed, however these appear to be intermittent debris rather than from previous disposal activities. No drums with waste material appear to have been disposed at the site. Therefore, the sampling and drum removal requirements for the dike area are not appropriate to Site SWQ.</p> <p>Site SWQ was not used for incinerator ash disposal purposes, as the incinerator ash from Building 1770 was disposed of at local landfills.</p> <p>There are no records or indications that Site SWQ was ever used for solid waste disposal. Therefore</p>

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				the comment refers to the vicinity of this site to the former Incinerator as potential use as an ash disposal area. This was not addressed in the response. Please recommend this area for the site investigation pathway.	a designation of 'non-site' is still recommended. The text has been updated.
75.	B400 Summary of Previous Investigations	The site is identified as having its own septic system. Please identify the septic system associated with B400 as a separate site, and develop an appropriate target analyte list for a site inspection. Septic systems at Air Force sites are typically investigated, except in areas that were only residential. Further conversations with the FAA about Flight Service Stations confirmed that contaminants like mercury have been found in drain fields and tanks due to improper disposal of weather instruments and the substrates related to them.	Partially Agree. The Recommendation section will be revised to be consistent with the approved Final FSP for Site B400. The text will be revised to include an SI investigation of the septic system with the approved target analyte list for the site. A new site will not be created for investigation of the septic system.	Response Accepted.	Accepted
76.	B400 Site Description and History	Abandonment information for the drinking water well was not located. Part of this site inspection should verify that the drinking water well was properly abandoned.	Agree. Recommendations will be updated to reflect components of the approved Final FSP for Site B400. These will include a site reconnaissance and potential geophysical survey of WW 5.	Response Accepted.	Accepted
77.	B400 Site Description	The PA states that the AST at the site is unlikely to be the original	Agree. The Site Description and History section and supporting documentation will	Response Accepted.	Accepted

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	and History	source of fuel for the building. Since there is potentially a UST located at this site an investigation needs to be performed to identify either its location, or disprove its existence. It is important to confirm whether or not this site contains a UST so that it can be appropriately closed. Please add this investigation into the recommendations for this site.	be revised to include information presented in the approved Final FSP for Site B400, which supports the presence of only an AST at the site. Additional photos of Building 400 that confirm only an AST was used in this location were provided by the FAA after the Draft PA was issued.		
78.	B400 Site Description and History	Please document the location of the transformer associated with this building. If the location is outside the building, then PCBs should be added to the target analyte list. If the location of the transformer cannot be confirmed through additional records searches, this discussion also needs to be included in the PA report. Because this site once contained a possible PCB transformer, it is important to document these facts as a reference for future site uses.	Agree. The location of the existing transformer at the site will be identified and target analytes will be revised to be consistent with the list in the approved Final FSP for Site B400.	Response Accepted.	Accepted
79.	B408 Site Description and History	Missing from site history information are the dates of operation for this building. Please include these dates in the narrative.	Agree. The start date of operations could not be determined, but the end date will be added to the PA text for Site B408.	Response Accepted.	Accepted
80.	B408 General	The PA reports that this building had an associated sump pit. This sump pit should also be considered a separate site from B408. Because sump pits are historically sources of contamination due to improper disposal practices they may require	Disagree. Sumps used for improper disposal are typically associated with buildings with activities that may generate wastes. Based on the location of the strobe shack on the airfield and its use for protecting lighting equipment only, improper disposal of wastes in this sump are not	Disagree with Response. As agreed during the June 2010 Anchorage TPT meetings, all septic systems, OWS, and sump pits will be	Partially Agree – A handwritten note in the facility records indicates that the facility included a sump pit. The sump pit was presumably used for collecting

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		a more involved assessment. Please identify the sump pit associated with B408 as a separate site, and develop an appropriate target analyte list for the site inspection.	anticipated.	investigated unless use of the building is confirmed as residential or strictly administrative. Refer to document "Specific Comments on 27 Sites"	PCB-containing oil because the facility was a small shack only used to shelter the transformer; no maintenance activities were conducted at the facility. The handwritten note is included in the supporting documentation, and the text has been updated. The site will be investigated for PCB contamination from the transformer and sump pit.
81.	B408 Recommendation	This site was recommended as a 'non-site'. However, because of the hazardous nature of PCBs and lack of prior investigation in this area, this site should be recommended for a site investigation.	Agree. An SI investigation will be developed for this site.	Response Accepted.	Accepted
82.	B1403 Site Description and History	There is a 300 gallon diesel tank identified in the PA as the only tank associated with B1403. Please identify if the 300 gallon diesel tank associated with this building above or below ground. Please identify the removal records for this tank are available.	Agree. The text in the Site Description and History section will be revised, consistent with the approved Final FSP for Site B1403, to include the rationale for the conclusion that the tank was an AST rather than a UST.	Response Accepted.	Accepted

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		<p>If this tank is a UST and there are no removal records available, investigation into whether this tank has been left in place needs to be performed to ensure proper closure.</p> <p>Please clarify the type of tank associated with this site, and if appropriate (UST) include an investigation to determine its location.</p>			
83.	B1403 General	Based on the description and type of building, there are no floor drains associated with B1403. ADEC recommends sampling in the vicinity of building doors, as these were often means of improper waste disposal. If the locations of the doors cannot adequately be determined, then four samples (one on each side of the building) should be taken to confirm or rule out contamination at this site.	Agree. The Recommendations section will be revised to reflect the field investigation described in the approved Final FSP for Site B1403.	Response Accepted.	Accepted
84.	B1558 Site Description and History	<p>Missing from description are 4 removed USTs associated with this building. The 2010 EBS states:</p> <p>"Tank removal activities at 23 UST locations (Tank IDs 1400, 1401, 1404-2, 43, 46, 47, 48, 49, 1499-4, 1551-1, 1552, 1558-1, 1558-2, 1558-3, 1558-4, 1558-5, 1572, 1578-3, 1770-1, 1770-2, 1837, 1854, and 2541) identified varying levels of petroleum contamination in the surrounding soils. Additional</p>	<p>Partially Agree. Text will be added to the PA stating that the five USTs were removed from the area and that the petroleum contamination from these tanks is currently addressed under investigations for ERP Site SS021 and ERP Site SS014 (also called Site ST021 and Site ST014, respectively, in some documents).</p> <p>The target analyte list and recommended field investigation will be consistent with those in the approved Final FSP for Site</p>	Response Accepted.	Accepted

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		<p>investigation should be conducted to determine if a release has occurred at these sites and to complete regulatory closure of the removal actions."</p> <p>Therefore in addition the suggested PCB sampling, the site investigation needs to include compounds for petroleum related contamination. Or, the records of removal need to be found and included in the PA to prove proper closure of these USTs.</p>	B1558.		
85.	S1769 Recommendation	This site is stated as having a "gentle westward slope toward a wooded area outside the storage fence". If contamination is identified, then additional sampling would need to include areas outside the boundaries of the site as there is potential for ecological pathways to be complete. This should be clarified in the recommendations section of the report.	Agree. Text in the PA (Potential Exposure Pathways and Receptors, Conclusions, and Recommendations sections) will be revised to include information presented in the approved Final FSP for Site S1769.	Response Accepted.	Accepted
86.	S1769 General	Please confirm that all soil vapor samples in the vicinity of the S1845 investigation are also considered at this site. Additionally, please summarize the results and conclusions from previous investigations at the site.	Agree. The Summary of Previous Investigations section will be checked against that of the approved Final FSP for Site S1769 and will be revised if necessary.	Response Accepted.	Accepted
87.	S1769 Target Analytes	Because this site was historically used to store hazardous materials and because 2,4,5 T was historically used by the military, please perform	Agree. Text will be revised, consistent with the approved Final FSP for Site S1769, to note there is no indication that 2,4,5-T was	Response Accepted.	Accepted

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		a search of the hazmat disposal records to confirm whether it was present at any time at Galena. If it is found in the historic record search, dioxins should be added to the target analyte list.	handled at the Former Galena FOL.		
88.	B1770 General	<p>It is stated in the PA that the area was re-graded and stockpiled with soil since the building demolition. Since no records of release were located and no ash was seen during the site visit, this site was recommended a 'non- site'.</p> <p>However, because this area was disturbed (re-graded and soil stockpiled), any visual evidence of contamination was destroyed. In order to provide evidence that there is no contamination at this, sampling needs to be conducted. This site should be recommended for a site investigation using methods that are appropriate for a site that was re-graded. These would likely include grab samples below the fill material and possibly down gradient groundwater samples.</p>	<p>Disagree. The potential source is a surface release of incinerator ash. Sampling below the surface of the former building would not indicate the presence or absence of a surface release of incinerator ash.</p> <p>However, the USTs at the former Building 1770 are being investigated both in the footprint of the building and the area surrounding the building. Sampling will be done in 2011 at this site and the field crew can examine the soil cores for evidence of ash.</p>	Disagree with response. MI Sampling with contaminants of concern related to incinerator ash disposal is recommended at this site. MI sampling should be conducted below any new fill material.	<p>Clarification – Historical records indicate that incinerator ash was disposed to local landfills.</p> <p>Soil samples were collected from borings installed at UST Site 1770 in 2010, including one boring (UST1770_GP001) located within the former Building 1770 footprint. No ash was observed.</p> <p>No incinerator ash was released to soil at Site B1770. The test has been updated, and the boring log for UST1770_GP001 is included in the supporting documentation.</p>
89.	B1770	The digital date on this picture is	Agree. The photo was taken in October	Response Accepted.	Accepted

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	Figure A4	2003. The picture citation states this picture was taken during the 2009 site visit. This information conflicts. Please revise the photograph's citation, or provide information as to why the date on the photograph conflicts with the date the photograph was taken.	2009, but the photographer was unaware at the time that the camera had the wrong date settings. Text will be added stating that the digital date on the photograph is incorrect.		
90.	B1812 Site Description and History	There are 2 base supply wells located at the site. They are non-potable, but still deserve mention in the site description. Please revise text to include vicinity of base supply wells. Investigation into the effect of site contamination on these wells needs to be performed and evaluated to ensure protective measures that are in place for the potable wells nearby. Institutional controls need to be proposed and put in place to restrict the use of the wells. The PA should refer to these remedies and recommend whether additional sites need to be created or whether these measures can be referred to in association with this site.	Agree. The text will be revised to include information consistent with the approved Final FSP for Site B1812. The need for further protective measures for existing potable water supply wells will be based on the determination of the nature and extent of groundwater contamination per the Groundwater OU FSPs. The USAF has already installed an air stripper as part of the current potable water treatment system as an interim protective measure pending the completion of the investigations.	Response Accepted.	Accepted
91.	B1879 Record Review	One document was found to reference this location that was not listed in the PA. This reference has information on the site, but it is not comprehensive enough to be used as a deciding factor for the site. However, this reference does show	Agree. A statement will be added to the PA referencing this report.	Response Accepted.	Accepted

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		the ERP site and the contamination levels for the sampling that has been done at this site. The referred to document is 860.38.002 Galena AFS-Airport Million Gallon Hill Draft 2008 Site Characterization Data.pdf			
92.	B3005 Recommendation	There is a 4 inch diameter pipe identified in the PA report. The purpose of this pipe was not identified through historical records. The pipe that is known to exist has to have had a purpose. Investigation should be done to determine if there is a UST, vault, valve pit, or pipeline in the ground underneath it, so it can be investigated further and appropriately closed if there is no contamination.	Agree. The Recommendations section will be updated to include a description of the geophysical survey included in the approved Final FSP for Site B3005.	Response Accepted.	Accepted
93.	B3005/3205 Target Analytes	Please document the location of the transformer associated with this building. If the location is outside the building, then PCBs should be added to the target analyte list. If the location of the transformer cannot be confirmed through additional records searches, this discussion also needs to be included in the PA report. Because this site once contained a transformer that possible contained PCB oil, it is important to document these facts as a reference for future site uses.	Agree. Text in the Site Description and History and Target Analyte sections will be revised to be consistent with the approved Final FSPs for Sites B3005 and B3205 with respect to the location of transformers and the rationale for excluding PCBs from the target analyte list.	Response Accepted.	Accepted
94.	AOC23 (WAA) Target Analytes	Please include a discussion as to whether or not this site was used to	Agree. Text in the Site Description and History section will be revised, consistent	Response Accepted.	Accepted

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		store or dispose of incinerator ash.	with the approved Final FSP, to include the rationale for the conclusion that incinerator ash was not stored/disposed of at Site AOC023.		
95.	BERM Recommendation	There was a confirmed AST placed at this site for a short time, but no reports as to why it was only in place for a short time. This needs to be investigated further. Please provide documentation identifying the reason for removal of this AST. Because historical use at this site is also unknown, if the ground has been disturbed after removal, and records cannot be located confirming that there is no evidence of a leak, then the suspected area of the AST should be sampled to provide evidence of no leaks or spills.	Partially Agree. The USAF will attempt to identify the reason for removing the AST. A VSI that looked for staining or evidence of spills was completed in 2010. Because no evidence was found, there is no reason to proceed with sampling in this area.	Response Accepted.	Accepted
96.	BLA Supporting Documentation	Information provided about this site in the Supporting Documents section may be about Campion AS (the RI Report) instead of Galena. Please verify that the subject of this referenced report relates to Galena, AS.	Agree. The excerpt from the 1996 (RI will be removed from the supporting documentation.	Response Accepted.	Accepted
97.	TAR General	At the April 2010 meetings at CH2MHILL, Anchorage about the location of this tar pit and the possibility of another tar location at Galena was questioned. A solid tar disposal was found in 2009 at the	Agree. Recommendations will be added to evaluate potential additional tar areas.	Response Accepted.	Accepted

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		<p>Rocket Canister site. Please also include in the 'Recommendations' section plans to evaluate the potential additional tar pit areas. Please discuss disposal methods for different types of tar encountered and sampling for closure of the areas with respect to tar or related compounds being the contaminants of concern.</p>			