

Galena Technical Project Team Meeting #20
Department of Environmental Conservation, Anchorage Office
March 13-14, 2006

TPT Members

Ragine Pilot	Louden Tribe
Marvin Yoder	City of Galena
Harry White	Galena Schools-absent
Dave Hertzog	Air Force
Colin Craven	Department of Environmental Conservation (DEC)
Phil Koontz	Louden Tribe
Colette Foster	Department of Transportation (DOT) (absent)
Darren Mulkey	Department of Transportation
JoAnn Grady	Facilitator

Support Personnel

Max Schwenne	Oasis Environmental-AF contractor
Mark Stelljes	SLR Environmental-DEC contractor (via teleconference)
Ron Porter	Mitretek -AF contractor (via teleconference)
Manish Joshi	Earth Tech-AF contractor (via teleconference)
Patrick Haas	Patrick Haas and Associates-Earth Tech (via teleconference)
Krista Graham	Oasis Environmental (via teleconference)

Summary Comments

March 13, 2006

The Galena Technical Project Team (TPT) gathered in Anchorage for comment resolution regarding the Remedial Investigation Feasibility Study document (RI/FS). The team began with comments regarding the risk assessment (RA) portion of the RI/FS. The following is a summary of the team's resolution of concerns.

JOHNSON AND ETTINGER CRITERIA

DEC commented that the current USEPA 3.1 version of the J&E model should be used in the risk assessment. USAF responded that the AF had used the 2.3 version of the model because the TPT had approved the Final Risk Assessment Work Plan which referenced that version. After lengthy discussion, the AF agreed to run the J&E models for potential future buildings at 5 sites as a conceptual exercise for potential future risk incorporating the default values from the 3.1 JE model, which include:

- Default building size of approximately 1000 square ft.
- Air exchange rate of .25/Hour
- Pressure differential of 10 pascals

The team agreed that the aforementioned results should be included as an addendum to the RA portion of the RI/FS document. The team agreed to maintain the J&E parameters originally specified in the draft risk assessment.

DEPTH TO GROUND WATER CONTAMINATION

DEC commented that areas with different topography should be considered as separate areas with regard to measurements of their ground water depth, specifically at Million Gallon Hill (MGH) and the Missile Storage Area. (MSA) DEC remarked that they would like to see documentation in the RI to show how groundwater measurements were incorporated and used in the model of each site so that it could determine whether the range of depth was appropriate. After a brief discussion EarthTech remarked that the data had been included in the RI/FS document and they would also include it in the RA portion of the document.

ELEMINATION OF OUTLIERS FROM STASTICAL ANAYLSIS

The DEC stated they felt that it was inappropriate to remove data points as statistical outliers in the RA calculations when those data points showed the highest concentration of contaminants in their respective data sets. DEC asserted that in order to be consistent with the guidance document referenced in the RA, calculations made with the outlier must be presented.

AF replied that relevant EPA guidance requires random sampling to avoid biased data and since the sampling in this case was not random, it was appropriate to remove outliers to create a more realistic assessment. After an extensive discussion, the team agreed to:

- Eliminate the metals outliers because the entire metal/background discussion was moved to risk management.
- Eliminate the obvious outliers, i.e. where the concentrations were essentially above solubility or soil holding capacity limits.
- For the remaining points, calculate the risk with the outlier included and add a column in the table which shows both the risk for the compound in question, with and without the outlier.
- Establish an addendum to the RA providing the rational for the removal of the outliers.

COMMENTS FROM LINDSAY SMITH, ADEC, ON THE DRAFT RI/FS

Metals

Mr. Stelljes referred to Ms. Smith's request that the AF provide more quantitative data to justify it's statement that a decision to remediate arsenic should be preceded by a consideration of the high levels of background arsenic that exist in the area. After a brief discussion, the team agreed to accept the information provided in the uncertainty section of the RA on decisions regarding background arsenic levels.

Mr. Craven, DEC project manager, said that he would like the AF to address sampling results that demonstrate the possibility of lead contamination at the JP-4 Fillstands and Million Gallon Hill MGH/MSA sites. DEC suggested the sample be considered as an outlier and added to the aforementioned addendum to the RA in order to provide the rationale for its removal.

Control Tower Drum Storage Area

Mr. Craven stated his concern regarding the AF using information from the 1996 RA as the basis for decisions regarding the Control Tower Drum Storage Area (CTDSA) because (1) the 1996 RA was never accepted by DEC, and (2) both the AF and DEC agreed to create the new RA. AF stated the site had intentionally been excluded from the new RA because information on the site (and included in the previous RA) did not show concern. DEC agreed that the site is an anomaly and volunteered to craft language for the AF to review on how to address the site in the new RA.

March 14, 2006

LAND USE CONTROLS

Mr. Hertzog began the morning's discussion on land use controls (LUCs). He stated that LUC's are necessary to allow the AF to return the land to the DOT while fulfilling its responsibility to remediate the impact that it has caused the state. He added that many elements of the remediation will require between 5 to 40 years and, consequently, proper engineering controls must be established to prevent inappropriate development over contaminated sites after the base has been returned.

DEC's Jennifer Roberts stated that the AF could hold easements to restrict land use in contaminated sites and added that there many possible ways that this could be done depending on what the parties are willing to do. She added that the sooner the city decides on future land use, the sooner the DEC will be able to make regulatory decisions.

Marvin Yoder, Galena City Manager, stated the city is interested in some of the land and buildings within the base triangle, but it is concerned about how development in the contaminated areas will be controlled. He added that the city's interest in some of the existing buildings is contingent upon the results of its ongoing building survey and whether the state decides to build a military academy in the area.

DOT's Darren Mulkey said the DOT's legal team is working on determining the legal implications of LUCs and it is not prepared to discuss them at the present time. He said that the DOT would consider the issue when the lawyers representing the DEC, DOT and AF meet in Fairbanks on April 10, 2006.

Facilitator JoAnn Grady suggested that the TPT members consider a master time line so that each entity could be informed of the activities of the others as their work moves forward. Mr. Hertzog responded that the AF would like to know about developments,

such as the academy decision, city engineering study, and decisions regarding the acceptability of remediation systems that will affect its efforts and exit date. Ms. Roberts stated that many of the DEC's decisions pertain to ground water regulation, the application of which is somewhat dependant on how the community decides to manage its use of groundwater. She stated the DEC should to be informed about these decisions.

Mr. Mulkey said that the DOT recognizes the local reuse authority (LRA) and the DOT's intent with regard to land transfer will be based on the LRA timeline. He recognizes that the city could not progress until it had finished its engineering study and the state has made a decision on the proposed military academy.

Mr. Hertzog said that he would like to see the RI move forward during the next meeting because the AF has already proposed LUCs in the RI/FS. DEC agreed that final details regarding LUCs can be worked out after finalizing the RI/FS.

NEXT MEETING TIME AND PLACE

After a brief discussion, the TPT agreed to set the next meeting date after the joint meeting of the DOT, DEC and AF of April 10, 2006. TPT members will be informed of meeting specifics via e-mail.