

APPENDIX L

Galena Work Plan Approval Letter

STATE OF ALASKA

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File: 860.38.005

July 7, 2010

Al Weilbacher
Building 171
2261 Hughes Ave, Suite 155
Lackland AFB, TX 78236-9853

Re: Approval of Work Plan for Site Inspection, Remedial Investigation, and Site Characterization
Former Galena Forward Operating Location, Alaska

Dear Mr. Weilbacher:

The above referenced work plan is approved subject to the agreed upon conditions included in this letter. Attached please find comment response summary on the document "*Work Plan for Site Inspection, Remedial Investigation, and Site Characterization Former Galena Forward Operating Location, Alaska*" received in the Alaska Department of Environmental Conservation's (DEC) office June 16, 2010, and action item meeting notes from the June 30, 2010 Galena Project Team meeting. This approval is being made prior to incorporation of the agreements into a final document.

In July 2010 a draft red-line version of the "*Work Plan for Site Inspection, Remedial Investigation, and Site Characterization Former Galena Forward Operating Location, Alaska*" was prepared and posted via ftp site. The intent of this revised document was to present in draft the agreed changes to the Work Plan from formal comment responses, as well as additional revisions to the Work Plan derived from discussions during base Cleanup Team meetings held in Anchorage June 28- June 30, 2010. DEC has reviewed the changes to the draft work plan. This approval allows you to proceed with field work this season on the 6 initial sites identified in the plan, the site-wide monitoring plan, and the groundwater characterization described in Appendix D. DEC approval of this Work Plan is a necessary step in the Right of Access and permitting process, which must be completed prior to commencing field work. This letter is also intended to facilitate those objectives.

As submitted, DEC accepts this draft revised work plan as sufficient to initiate field work. Please distribute this to facilitate the initial field work. We understand that a final copy of the work plan incorporating these and the below referenced revisions may take a few weeks to produce. Additional comments may be necessary after adoption and review of the agreed changes and additional revisions into a final document. Any changes from this review will be discussed and developed as part of the TRIAD process outlined in the document. Most of the agreed changes are outlined in the attachments provided. Selected additional revisions that have been agreed to but not yet incorporated are listed below.

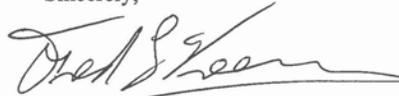
General: Some sections of text that were to be revised have not yet been re-written based on the draft red-lines that were provided on July 3, 2010. Other sections are missing from the new draft document. Examples include: eco-scoping forms in Attachment 1 of Appendix G are missing, composite sampling is still referred to in SOP 29 despite response to comment 265, and there are likely others.

The final document must include these revisions which have already been agreed to. In addition, the numbering on several sections has changed due to additions or deletions from the edits. These will need to be reviewed to ensure consistency with comment responses prior to publishing the final document. Any significant modifications can be agreed to during regular TRIAD reviews.

- It was discussed that DEC sampling requirements recommend a minimal 10 percent PAH analysis at POL contaminated investigation areas. Language needs to be added to the text to clarify that the samples chosen for PAH analysis must correspond with the samples containing the highest levels of DRO concentration. This applies for both soil and groundwater sampling.
- Comment 248: This comment on specific soil gas procedures has been changed from an agreement to provide a detailed SOP to language indicating “driller’s preference” being exercised. This is not appropriate or satisfactory. Please provide a detailed SOP for vapor intrusion investigations as detailed in the comments and agreed to in the original response. The new procedures will be proposed and approved during future TRIAD meetings prior to work commencing on vapor intrusion assessments.
- Comment 249: This revised response to the comment reflects a misunderstanding of the intent of the reviewer. A revised procedure has been provided for soil gas samples by direct push and will be reviewed and approved during future TRIAD meetings. Revised procedures may be modified during the project during TRIAD reviews.

The statements and agreements provided here are sufficient to support DEC’s decision to approve this Work Plan. It is sufficiently detailed and comprehensive to begin field work, and it incorporates a planning system called TRIAD as a process for further changes and decisions to be made during the work. I look forward to working with you on this project.

Sincerely,



Fred Vreeman
Environmental Program Manager

cc: Bill Ohalloran, DOT, via email
Becky Iles, DOT, via email
Colette Foster, DOT, via email

Sam Myers, DOT, via email
Tom Corrigan, Galena City Manager, via email
March Runner, Loudon Tribal Council, via email
Phil Koontz, Loudon Tribal Council, via email
Donna Kozak, Booz Allen Hamilton, via email
Win Westervelt, CH2MHill, via email

Attachments: Meeting Notes dated June 28, 2010 (meeting held June 30, 2010)
Comments dated 16 June, 2010

