

Stewart Air National Guard Base
Restoration Advisory Community (RAC) Questions
March 2020

Meeting Materials, Venue & Online Repository

- 1. In addition to providing the Meeting Agenda and Minutes in Spanish and English, can you provide the Site Studies/Materials (of sites to be discussed) in both languages 2 weeks prior?**

Response Provided By: Nicole Wireman, National Guard Bureau (NGB)

Response: The Air National Guard (ANG) does not have the capacity to support translation of additional material beyond the meeting agenda and minutes due to the difficulty in getting the materials translated in a timely and effective manner. For site reports and work plans, it would be cost prohibitive to have thousands of pages of technical text translated and difficult to have highly technical material properly translated into Spanish. For meeting presentation slides, the ANG is under a tight timeline to get the slides to RAC members two weeks prior to the meeting. Since translating the last RAC meeting minutes to Spanish took roughly two weeks, that would require slides to be ready for translation four weeks prior to a RAC. This would impact being able to present up-to-date information at the RAC meeting.

All RAC members speak English, but the ANG understands that some of the public may speak only Spanish. Since the RAC members serve as a bridge to the public and a couple of RAC members speak Spanish, the ANG suggests that those RAC members might be able to communicate with the Spanish-speaking community and pass on any questions to the ANG at RAC meetings or through the RAC Co-Chairs.

- 2. In hands-outs, please include name, title, agency/company, contact info. for each site manager/presenter as well as a clear site ID so we can find materials readily on the repository**

Response Provided By: Nicole Wireman, NGB

Response: Name, title, and agency/company for each presenter and site ID, if applicable, will be added to the presentation slides on the initial page for each presenter. However, presenter contact info will not be added since all questions should either be asked during the RAC meeting or forwarded to the RAC Co-Chairs in between meetings. The ANG RAC Co-Chair will make sure the questions are distributed to the appropriate person and answers will be provided back to the Community RAC Co-Chair (Mr. Chuck Thomas).

3. Can a list of associated acronyms be provided 2 weeks prior as well?

Response Provided By: Nicole Wireman, NGB

Response: Yes

4. Can Stewart ANG/DOG extend time at Armory to accommodate a longer public comment period?

Response Provided By: Heather Pfeiffer, BERS Weston

Response: Stewart Air National Guard Base and the NGB want to respect the time of all participants especially on a weeknight. As such, we prefer to limit the time of the meetings to 2 hours and will work with the community co-chair, contractors, and partners to ensure that the agenda continues to support time for the RAC members to cover RAC business and leave time at the end for public questions. If the public would like to request another public meeting, that request should come outside of the RAC channels.

5. Can you clarify which studies we have and do not have access to on the online repository (are consultant studies available or only agencies reporting on CERCLA process?)

Response Provided By: Nicole Wireman, NGB

Response: The online Administrative Record (AR) includes final documents and materials as required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as well as regulator comments on draft final documents and responses to those comments. The AR will include documents prepared by the ANG, to include consultant studies prepared by the ANG, for the CERCLA process. The intent of the AR is to document the selection decision for a CERCLA response action and provide documentation showing how the public was involved in selecting the cleanup.

The following identifies documents which will not be included in the online AR because the AR is a public domain for CERCLA actions and these documents are considered internal:

1. The project for the Interim Storm Water Treatment System at Recreation Pond is being conducted in accordance with the Clean Water Act, rather than CERCLA. Therefore, documents related to this system will not be included in the AR.
2. Draft final documents (CERCLA or otherwise) that are distributed for New York State Department of Environmental Conservation (NYSDEC) and RAC review are also not included in the AR. Draft final documents are not typically provided to the general public because the applicable regulators have not had a chance to comment on them and changes will still be made based on regulator comments.

Documents that are not included in the online AR will be sent to the Community RAC Co-Chair and ANG recommends that the RAC decide how they are distributed to other RAC members. ANG also recommends they be placed on a platform that is restricted to only RAC members.

Note that the URL for the online AR has changed due to transfer of the documents to a cloud-based system. To access the online AR:

1. Go to <https://ar.afcec-cloud.af.mil/>
2. Click on the Air National Guard radio button
3. Select “Stewart Int Airport,NY” in the “Installation List”
4. Click “search”

6. Can you provide a labeled map of the underlying pipe systems and storage facilities on base?

Response Provided By: Mike Oettinger, Stewart Air National Guard Base

Response: There are various maps included as part of the expanded site inspection that will be available to the RAC in the forthcoming Expanded Site Inspection Report. The contractor conducting the expanded site inspection has recommended further exploration of the storm drain network which will result in more informative mapping in the future. Maps associated with the investigations will be provided to RAC through the investigation reports.

Interim PFOS/PFOA Treatment System at Recreation Pond

7. Can we be notified of shut-off and turn-on of the IRM System on Rec Pond?

Response Provided By: Jessica Frehse, U.S. Army Corps of Engineers (USACE), and Nicole Wireman, NGB

Response: This is to be determined since the notification process will be developed in conjunction with the NYSDEC. However, the RAC will be informed of the status of the Interim Storm Water Treatment System at every RAC meeting.

8. Can we have access to Westin Engineering's full studies of Interim Treatment System?

Response Provided By: Nicole Wireman, NGB

Response: See response to #5. The following two documents will be sent to the Community RAC Co-Chair for distribution to the RAC: September 2019 Mitigation Plan and January 2020 Technical Memorandum on Temporary Water Treatment System Operations Summary and Temporary Shutdown.

9. What lab(s) are Westin Engineering using to do their analysis?

Response Provided By: Jessica Frehse, USACE

Response: BERS Weston is using a lab that complies with all Department of Defense (DoD) Environmental Laboratory Accreditation Program (ELAP) and NYSDEC requirements.

10. How long does the verification process take & why?

Response Provided By: Meg Watson, BERS Weston

Response: The total time from sample collection through data verification and distribution process of analytical data can take up to 60 days.

The process includes the following steps with actual times that may vary:

- Samples collected /shipped to the laboratory and analyzed – 15 days.
- Reanalysis if method criteria are not met – 5 days.
- Report prepared by the laboratory to BERS Weston – 3 days.
- Review by BERS Weston chemist with report and tabulated data – 5 days.
- Report review by USACE chemist for comment and approval – 5 days.
- Finalize report and distribute to project team – 3 days.
- Full review/approval throughout NGB/ANG/USACE divisions for outside distribution – 25 days.

The process and duration of each step is essential to ensure the data is accurate and reliable.

11. What are the costs of this project - current & projected?

Response Provided By: Nicole Wireman, NGB

Response: \$2,809,074.48 has been spent on the Interim Storm Water Treatment System at Rec Pond to date. The ANG is still determining projected costs based on the results of the ongoing pilot study and system reconfiguration.

12. What is your research showing on the level of PFAS in sediment compared to water?

Response Provided By: Jessica Frehse, USACE

Response: We (USACE) don't currently have any research showing the level of PFAS in sediment compared to water. USACE posts all PFAS related material to

the Interstate Technology and Regulatory Council (ITRC) website:
<https://www.itrcweb.org/Team/Public?teamID=78>.

Response Provided By: Nicole Wireman, NGB

Response: The levels of six PFAS in groundwater, surface water, soil, and sediment are provided in the Final Report FY16 Phase I Regional Site Inspections, Per- and Polyfluoroalkyl Substances 105th Airlift Wing, New York Air National Guard, Stewart Air National Guard Base, Newburgh, New York (Wood, 2018). This document can be found on the online AR under AR#s 578833 – 578843. The main text of the report is in AR# 578833, the tables can be found in AR# 578834, and the figures are in AR# 578835 - 578836. Figures 15A and 15B of this document display Rec Pond Surface Water Sample Results and Sediment Sample Results, respectively, and all surface water and sediment results can be found in Tables 9 and 10, respectively. The report documents that during this Site Inspection, no analytical results for sediment exceeded the applicable sediment screening criteria in Rec Pond or any other on-Base and off-Base sampling locations. Additional sediment sample results will be included in the forthcoming Expanded Site Inspection Report.

- 13. Why hasn't lining the pond been considered to prevent contaminants from seeping into groundwater? Can it be in the future? (Standard procedure for oil spills)**

Response Provided By: Jessica Frehse, USACE

Response: This site is currently in the Preliminary Assessment (PA)/Site Inspection (SI) stage of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. Lining the pond could be an option that is evaluated during the Feasibility (FS) phase. Please refer to slides 18 and 19 of the 2-4-2020 RAC meeting presentation.

- 14. Before the treatment system experienced the solids problem, was it removing the PFAS from the water as anticipated?**

Response Provided By: Jessica Frehse, USACE

Response: Yes

- 15. Are they currently designing/installing an adequate solids removal equipment to the treatment system?**

Response Provided By: Jessica Frehse, USACE

Response: Yes

16. **If the treatment system did remove the PFAS before it plugged up, are there plans to design a larger system that can handle rain events ?**

Response Provided By: Jessica Frehse, USACE

Response: The ANG has implemented an Interim Storm Water Treatment System at Rec Pond. Going forward, design and installation of a larger treatment system would stem from the results of the other steps in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process [Remedial Investigation (RI), Feasibility Study (FS), Proposed Plan (PP) and Record of Decision (ROD); see CERCLA Process and CERCLA Steps and Actions slides in the 2-4-2020 RAC presentation]. The outfall at Rec Pond is operated under a NYSDEC State Pollutant Discharge Elimination System (SPDES) permit. As the state promulgates standards and the condition of this permit change, the ANG will comply with those requirements.

Additionally, the Rec Pond is owned by the New York State Department of Transportation (NYSDOT) and leased by the Port Authority of New York and New Jersey (PANYNJ). To make more permanent changes to this pond would require a partnership with the other stakeholders because the DoD cannot unilaterally make changes to a property not owned by the DoD.

Soil Remediation

17. **Do we know where the PFAS is in the soil profile? What is the soil profile & where were the samples taken?**

Response Provided By: Nicole Wireman, NGB

Response: The levels of six PFAS in groundwater, surface water, soil, and sediment are provided in the Final Report FY16 Phase I Regional Site Inspections, Per- and Polyfluoroalkyl Substances 105th Airlift Wing, New York Air National Guard, Stewart Air National Guard Base, Newburgh, New York (Wood, 2018). This document can be found on the online AR under AR#s 578833 – 578843. The main text of the report is in AR# 578833, the tables can be found in AR# 578834, and the figures are in AR# 578835 - 578836. Overall soil sample locations are displayed on Figure 3 of this report, while specific soil sample locations and results including depth profiles are shown for each potential release location on Figures 12A – 12L and in Table 7. Additional soil sample results will be included in the forthcoming Expanded Site Inspection Report.

Site Tours

- 18. Can the RAC (and public who are interested) be given a tour of the Interim Treatment System at Rec Pond?**

Response Provided By: Jessica Frehse, USACE

Response: This request has been submitted to the commander at Stewart Air National Guard Base and we are waiting for a determination. We expect this request to be delayed due to the recent COVID-19 pandemic.

- 19. Can the RAC (and public who are interested) be given a tour of Stewart ANG base?**

Response Provided By: Jessica Frehse, USACE

Response: This request has been submitted to the commander at Stewart Air National Guard Base and we are waiting for a determination. We expect this request to be delayed due to the recent COVID-19 pandemic.

Acronyms

ANG	Air National Guard
AR	Administrative Record
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DoD	Department of Defense
ELAP	Environmental Laboratory Accreditation Program
FS	Feasibility Study
ITRC	Interstate Technology and Regulatory Council
NGB	National Guard Bureau
NYSDEC	New York State Department of Environmental Conservation
NYSDOT	New York State Department of Transportation
PA	Preliminary Assessment
PANYNJ	Port Authority of New York and New Jersey
PFAS	Per- and polyfluoroalkyl substances
PFOA	Perfluorooctanoic Acid
PFOS	Perfluorooctane Sulfonate
RAC	Restoration Advisory Committee
Rec Pond	Recreation Pond
RI	Remedial Investigation
ROD	Record of Decision
SI	Site Inspection
SPDES	State Pollutant Discharge Elimination System
USACE	U.S. Army Corps of Engineers