

ELMENDORF/KULIS QUESTIONS #4

1. Please provide a copy of PCB test records.

ANSWER: See comments under 3. 23 C 10.2 below.

The solicitation references LUCs and ERPs. Please provide maps and details of their locations (including lat/long) and restrictions.

2. 22 C 10.1 Permit Compliance: We would like to see copies of existing environmental permits or a list of permits and names of the agencies that permits were issued by.

Hazardous Waste:

U.S. EPA RCRA Part B permit (to operate a hazardous waste Treatment, Storage, and Disposal facility)

Air Program Permits:

Title V - 291TVP01A - Power Plant

291TVP01B - Hospital

291TVP01C – Flight line

The Title V permits are issued by ADEC and can be viewed on their website. Due to the installation of numerous boilers as part of the ESPC project, it is likely that we will require one or more additional Title V permits.

ORLs - 291ORL01 - Fire Protection

291ORL02 - Road Painting

PALs - 291PAL02 - Communications

291PAL04 - Admin/Engineering

291PAL07 - Non-AAFES Fueling

The ORLs and PALs are self imposed limits on operations to keep potential emissions below the Title V threshold. ORLs can also be viewed at the ADEC website.

Water Program Permits:

NPDES - Stormwater Multi Sector General Permit, MSGP-2000, for Industrial Activities

Stormwater General Permit for Construction Activities,
AKR100000

Wastewater Discharge - AWWU Industrial Wastewater Discharge Permit #11

We also have a bird depredation permit; an eagle exhibit permit; a wildlife collection permit; and various other wildlife exhibit permits (for displaying museum wildlife).

3. Are there currently non-compliance issues related to any of the above referenced permits?

Answer: As of 29 Jul 04, Elmendorf has no outstanding compliance violations (Notice of Violations) from any environmental regulatory agency.

4. 23 C 10.2 We would like to receive a copy of the existing Spill Contingency Plan for the electrical facilities subject to privatization. The web address referenced in RFP gives an error message. Please confirm the correct link to the National Response Team's Integrated Contingency Plan Guidance. What is a dead line for submitting a new spill contingency plan (if this option is selected)? (note: This RFC is similar to RFC #9 of our first set of questions.)

Answer: Elmendorf can provide an electronic copy (on CD due to its size) of our base spill contingency plan. This plan is due for renewal in Aug 2004. Additionally, the contractor must submit a site spill contingency plan in their proposal package and the plan must be ready to implement before operations can begin. In other words, the day the contractor starts operations on base, their employees must be properly trained and appropriate spill response equipment must be purchased and be on site. The 3 CES Environmental Flight can answer any additional questions regarding a site-specific spill contingency plan.

EPA links to C-Plan guidance:

National Response Team:

<http://www.epa.gov/superfund/programs/er/nrs/nrsnrt.htm>

Who must prepare Facility Response Plans:

<http://www.epa.gov/oilspill/frpwho.htm>

Overview: <http://www.epa.gov/oilspill/ncpover.htm>

Key points: <http://www.epa.gov/oilspill/ncpkeys.htm>

5. 23 C 10.3 **MSDSs and other environmental records are not listed in the transfer documents section. Does Elmendorf intend to include MSDSs, copies of analytical testing for PCBs, and other environmental records in the list of documents for transfer?**

Answer: Elmendorf is required under the Emergency Planning, Community Right to Know Act (EPCRA) to maintain an inventory of all hazardous materials (hazmat) used on base, where these materials are stored, and in what quantity. To do this, we computer track all hazmat and require MSDSs. In circa 1992, Elmendorf sampled all electrical transformers on base for PCBs. A concerted effort was then made to remove all transformers that contained over 50 ppm PCBs. To our knowledge, there are no transformers on base over the 50 ppm threshold. However, we test all transformers turned in for disposal to ensure we are under the regulatory limit.

For PCBs, the analytical testing results are filed at the base's Exterior Electric shop. It would be very difficult to produce a copy of the analytical tests given the size of the report and given the fact that there is not an electronic copy of these files. Additionally, many of the transformers originally tested in 1992 are no longer in use and have been sent for disposal.

The hazmat inventory is also extremely large and is computer-tracked using proprietary Air Force software. Making a paper copy of this inventory would be very difficult. Additionally, the hazmat used on base changes daily; therefore, a copy of this inventory would quickly become out-of-date in just a short time.

Given these constraints, Elmendorf does not intend to include MSDSs, copies of analytical testing for PCBs, and other environmental records in the list of documents for transfer. However, ML&P is welcome to view the data at either the HAZMART office for hazmat, or the 3 CES Exterior Electrical shop for PCBs.

6. 23 C 10.3 **Is it possible to review an inventory of hazardous materials and hazardous wastes that are stored/used at the electrical facilities subject to privatization?**

Answer: Yes. For hazmat, records can be reviewed at the base HAZMART office. For hazwaste, records can be reviewed at the 3 CES Environmental Flight.

7. 11 14.2. "Grantee will test any painted surface to be affected by any of its operation, construction, installation, repair, or maintenance activities to determine if the paint is lead-based and will handle that surface in compliance with all applicable laws and regulations and at Grantee's expense."

This statement seems more restrictive or burdensome than applicable regulations, which do not require testing all painted surface for lead. Does Elmendorf have lead-based paint and asbestos surveys for the facilities/equipment subject to privatization? Will these reports be transferred with the property?

Answer: Federal law (40 CFR 262) requires that generators of waste determine if the waste is hazardous prior to disposal. For instance, paint chips that are power-washed off a building during the paint-prepping process must be collected and tested for lead. If lead levels exceed 5 ppm, the chips must then be disposed of as hazardous waste. 40 CFR 763 requires testing to be done on any repair/renovation work that might involve asbestos containing materials. Given the age of the buildings on base, most contain lead-based paint and have asbestos containing materials. It is not economically feasible to have a base-wide inventory of all buildings containing these contaminants. Therefore, Elmendorf requires testing to be done for each renovation and/or repair. Our requirements are in line with federal regulations.

Attachment J1

8. J1-20 13.2 - 13.3 we would like to review records of decision (RODs) on contaminated sites and operable units (OUs) that are in the area of the electric distribution system.
9. We would like to review land use controls (LUCs) associated with the OUs referenced in RFC #6.
10. We would like to review maps with LUC boundaries, contaminated sites boundaries, and groundwater plume boundaries.
11. We would like to review maps with location of remedial treatment systems and groundwater monitoring wells in the electrical service area.

Answer: In response to the above solicitation comments regarding Attachment J1, the following documents should be reviewed:

Records of Decision (RODs) for Site DP98 and OUs 1, 2, 3, 4, 5, and 6

(webpage)

Land Use Controls Management Plan includes figures with LUC boundaries
(webpage)

Site Map - Note: Map correction - ST71 should be south of Building
7228, not Building 7210 (webpage)

Second Five-Year Review Report - 2003 (webpage) Management Action Plan
(webpage)

Engineered Wetland System Annual Report (webpage)

LF04 Debris Removal Annual Report (webpage) Bioventing Systems Annual
Report (Information Repository)

SD15 High-Vacuum Extraction Annual Report (Information Repository)

ST37 Engineered Wetland System Annual Report (Information Repository)

Groundwater Monitoring Annual Report (webpage) Monitoring Well Atlas
(Information Repository)

Remedial Treatment System Fact Sheets (webpage) - currently being
updated (available on webpage - 19 Sep 04)

Document location is indicated in the parentheses. The Elmendorf Air
Force Base webpage is at
<<http://www.elmendorf.af.mil/Othrorgs/Restorat/Webdocs/Index.htm>> and
the Information Repository is located at:

University of Alaska - Anchorage
Consortium Library (Reserve Desk)
3211 Providence Drive
Anchorage, Alaska 99508
(907) 786-1871

Hours vary with UAA schedule

e-mail: andlf@uaa.alaska.edu <<mailto:andlf@uaa.alaska.edu>> Web site:
www.lib.uaa.alaska.edu/webgroup/docs/reserve.htm
<http://www.lib.uaa.alaska.edu/webgroup/docs/reserve.htm>>