



July 24, 2019

Amie Davidson
Supervisor
Solid Waste and Contaminated Sites Section
Iowa Department of Natural Resources
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**Re: Response to Iowa Department of Natural Resources Comments on the
DRAFT SAMPLING AND ANALYSIS PLAN
185th AIR REFUELING WING
GATEWAY AIRPORT/COLONEL BUD DAY FIELD
SIOUX CITY AIR NATIONAL GUARD BASE
SIOUX CITY, IOWA**

Dear Ms. Davidson,

Wood Environment & Infrastructure Solutions, Inc. (Wood) has reviewed the Iowa Department of Natural Resources (Iowa DNR) response to the DRAFT Sampling and Analysis Plan (SAP) report dated May 24, 2019. Each comment is referenced below along with our response to the Iowa DNR.

General Comments:

The Iowa Department of Natural Resources-Contaminated Sites Section (Iowa DNR) has reviewed the Draft Sampling and Analysis Plan for the 185th Air Refueling Wing at Gateway Airport/Colonel Bud Day Field, Sioux City Air National Guard (ANG) Base in Sioux City, Iowa. Section 1.1 of the report outlines the scope of this project and states up to 15 private wells will be sampled during this phase. However, there is no mention of the public water supply well that lies within the two-mile area west of the Sioux City Airport. Please include this well in the sampling event and update your 'response scenarios' to include actions related to a public water supply wells (i.e. resampling protocol, steps that will be taken if a public water supply well is found to be impacted, etc.).

Clarification. The scope of this SAP is to identify if PFOS/PFOA have impacted drinking water supplies, so that the ANG can assist residential and business property owners with alternate supplies of potable water. Therefore, as pointed out in Iowa DNR Comment 5, policy statements are outside the scope of a sampling plan, and thus ANG chooses to revisit this topic once this phase of the investigation is complete. However, at the request of Iowa DNR, this public water supply well was included in the initial round of sampling, and results from the analysis will be submitted to the Iowa DNR.

The following issues were noted during review of the draft plan; however, in an effort to expedite sampling, these issues can be addressed/corrected with a letter acknowledging the changes and/or providing requested information within 30 days. These items should not affect the proposed sampling schedule.

Specific comments as follows:



- 1. Section 2.3.2 of the report outlines the laboratory analytical program. Please specify which laboratory will be used for analysis of samples.**

Changes made as applicable. ALS Environmental has been chosen as the analytical laboratory for the work detailed in the SAP, and this is now listed in Section 2.3.2 on page 2-5, and is also identified in Section 1.1, on page 1-1.

- 2. Section 4.0 of the report indicates there will be a monthly report generated that documents well sampling efforts during that period as well as a cumulative summary of sampling. Please cc the Iowa DNR on these reports so we maintain a copy of all relevant data.**

Non-Concur. The monthly activities report is completed by Wood to identify the tasks completed during that month, and submitted to the ANG. This is primarily for budgetary tracking and will not be submitted to the Iowa DNR. While Wood respectfully understands the Iowa DNR's need to maintain an understanding of the current data, concerns about privacy of personal resident's information prohibit us from sending analytical results directly to the Iowa DNR. A less formal means of data tracking could be accomplished through correspondence with the NGB/A4OR Environmental Restoration Program Manager Keith Freihofer, and his contact information is provided below.

- 3. Please cc the Iowa DNR on all Notification Letters sent to well owners.**

Non-Concur. Again, as detailed in the response to Comment 2, in order to best protect personal information of the property owners within the sampling area, Wood recommends correspondence with NGB/A4OR Environmental Program Manager Keith Freihofer for updates on sampling results.

- 4. Figure 2 -Site and Surrounding Area should be updated to include well identifications on the map and an additional table portraying well addresses and owners.**

Concur. The figure will be revised to include well identifications on the map and an additional table portraying well addresses and owners.

- 5. Throughout this document, there are instances of policy statements that are outside the scope of a sampling plan (e.g. Section 3.1.4 discusses actions that will be taken if the owner of an impacted well refuses connection to a public water supply). The Iowa DNR does not accept or reject these statements. Rather, these are issues that will be revisited once this phase of the investigation is complete.**

Concur. As mentioned in the clarification to the introduction paragraph, the purpose of this document is to outline the sampling and analysis procedures used to identify if PFOS/PFOA have impacted drinking water supplies, so that the ANG can assist residential and business property owners with alternate supplies of potable water. Therefore, policies on how to respond to specific issues beyond the scope of this SAP will not be addressed.



Wood, a contractor for the ANG, has developed the DRAFT SAP and this response to comments letter, in coordination with representatives from the ANG. If you have any questions or concerns, please contact the NGB/A4OR Environmental Program Manager Keith Freihofer. His information is as follows:

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Sincerely,

Wood Environment & Infrastructure Solutions, Inc.

A handwritten signature in black ink, appearing to read "Cory Vowles".

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A handwritten signature in black ink, appearing to read "Jean Firth".

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