

Draft Per- and Polyfluoroalkyl Substances (PFAS) Preliminary Assessment Report
Former 104th Air Control Squadron
Coos Bay, Oregon
February 2024

Document Prepared by: BB&E, Inc.		Prime Contract No.: GS00Q14OADS144			Prime Delivery Order No.: 47QFSA20F0035		
Comments Submitted By: CTCLUSI, Robinson Noble, and Oregon DEQ							
BB&E Point of Contact: Jeremy Bennett		Tele: 865-441-5430			E-Mail: jrbennett@bbande.com		
Comment No.	Page No.	Section No.	Para. No.	Category C-M-S-A	Text in Document	Comment	Response to Comment
1	-	1.1	1	-		Wooded areas east, south, and southwest of the site are owned by the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw (CTCLUSI) and are not managed by the BLM. [similar to prior DRB comment below]	Concur. The text has been revised to indicate that the area east of the installation is owned by the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians (CTCLUSI).
2	-	1.1	4	-	...initiated demolition of the remaining military facilities (CH2M Hill, 2017a).	Consider revising since buildings associated with the military facility still exist on the site owned by CTCLUSI.	Concur. The text has been revised to indicate that some buildings associated with the former installation still exist.
3	-	1.1	5	-	The U.S. Navy property also includes an undeveloped strip of land on the northern and western sides. A map illustrating the U.S. Navy's building designations is included as Appendix B.	I am unaware of the U.S. Navy property CURRENTLY including any undeveloped land outside of the fenced area on the western side and northern side. Perhaps this statement was meaning historically. I've looked at the map in Appendix B, which is a map that shows areas historically used and owned/used by the Navy and does not represent the current land ownership boundaries. It's of poor clarity since it's from old reports. Perhaps we can get more clarity on the current US Navy property boundaries and a better map of the boundaries of the current Navy property.	Concur. The referenced sentence has been removed. A revised map is not necessary.
4	-	4.7 - AOC E Sludge Drying beds	-	-		Waste oil and solvents were disposed of in shop drains and may have been disposed of at AOC E. Since solvents can contain PFAS compounds (unrelated to AFFF), investigation to identify if PFAS contamination exists at AOC E is warranted. It's my understanding that this report may only currently be identifying PFAS concerns associated with AFFF and that a supplemental document may be provided later to address PFAS concerns not related to AFFF. However, I would recommend a sentence addressing that in the document.	See Section 5.0 and 6.0. It is recommended to proceed to an SI for AOC E.
5	-	4.12 - AOC J Septic Field	-	-		The location of AOC J on Figure 2 does not appear to be located in right location. I'd recommend reviewing the location of AOC J from the 1994 Optech operational technologies – Installation Restoration Program, PA/SI Workplan Figure 1.2 and Figure 5.8, which shows AOC J located on the west side of Coos Head Road at Bastendorf Beach. Currently PFAS and PFOA are ubiquitous in municipal wastewater and most wastewater treatment does not remove PFAS/PFOA. Similarly to my comment in Section 4.7, the potential for PFAS investigation is warranted at AOC J but may or may not be associated with AFFF. I've included a link below for a reference document regarding PFAS in wastewater treatment for review by anyone interested. https://pubs.acs.org/doi/10.1021/acsestwater.1c00377#:~:text=Poly%2D%20and%20perfluoroalkyl%20substances%20(PFAS,14%2C15)	Concur. The location of the former septic field has been revised on Figure 2. Disagree. The documented use of the septic field was between 1957 and 1967, which is prior to the use of AFFF by the DoD.

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6	-	5.3 – Water Wells	-	-		Correction needed - The water wells shown on Figure 4 are predominantly located EAST and SOUTH-EAST of the site, which would make them UPGRADIENT of the site. I agree that groundwater flow direction is predominantly west and northwest. However, there likely will be some areas with a southwest flow direction (influenced by topography) near AOC A and AOC B, which is also suggested on Figure 3 made by CH2M Hill based on data from their former monitoring wells.	Concur. The text has been revised to indicate that based on an assumed groundwater flow direction being west/northwest, the wells are considered to be upgradient. Although there may be local deviations from the west/northwest groundwater flow, this is considered a data gap that would need to be investigated more in the future, as necessary.
7	1-2	1.1	-	--	Private residences are located to the south of the former installation.	In fact, the land immediately south of and adjacent to the subject property is a 47-acre parcel of the Tribe’s existing trust reservation land, which is undeveloped and forested and was transferred from the U.S. Bureau of Land Management per the Western Oregon Tribal Fairness Act (“WOTFA”), Pub. L. 115-103, 131 Stat. 2253 (2018). Please see the attached location and conveyance maps for reference. Also, based on aerial photos and Google maps, it appears that there are only perhaps three private residences south of that parcel, on Tunnel Point Lane, while most of that area is undeveloped forest land. We recommend revising PAR Section 1.1 to clarify this.	Concur. The text has been revised as requested.
8	-	-	-	-		Of the six potential release locations (“PRLs”) recommended for further investigation listed in PAR Section 6.0 on pages 6-1 to 6-2, please note that PRL 3, for AOC C—Outfall 2, does not appear to be located on this property. Instead, that lies within the fenced inholding which remains owned and controlled by the U.S. Navy. Please compare PAR Figure 2 with the attached overlay map generated from the Tribe’s GIS data. In contrast, PRL 4, for AOC C—Building 13 and multiple former USTs, lies immediately southeast of that Navy property, as shown in PAR Figure 3. Hopefully the ANG can coordinate with the Navy to access PRL 3 for the site investigation and the boundary proximity will not be problematic for investigating PRL 4.	Comment noted. The ANG will work with the U.S. Navy related to any potential Right of Entry coordination that may be required. The locations of the AOCs will be field verified prior to investigative activities.
9	-	-	-	-		The Tribe concurs with the conclusions and recommendations for investigating the six designated PRLs in PAR Section 6.0. In addition to investigating the previously identified former firefighting training area—PRL 6, for AOC K—the Tribe appreciates the cautious, conservative recommendation for investigating the remaining designated PRLs to confirm or rule out potential PFAS releases even where potential AFFF-related PFAS releases either are unknown or only may have occurred from secondary effluent releases—namely, PRLs 1-5, for AOCs B, C (three sites), and E.	Comment noted.

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10	-	-	-	-		<p>Oregon DEQ has reviewed the December Draft-Final PA report prepared by BB&E, Inc., and think it is generally comprehensive, and we agree with the proposed recommendations. However, regarding the AOCs that were not selected for SI at this time, If PFAS contamination is discovered at some of the AOCs investigated, we recommend that the exclusion of the other AOCs, particularly AOC A and AOC J be reconsidered, and the SI possibly expanded to include them. Also, if additional information comes to light that AFFF might have been used on the fire at the transformer spill at AOC D, we would also recommend investigating AOC D for PFAS.</p>	<p>Commented noted. The AOCs referenced above will not be recommended for SI as part of this preliminary assessment for the following reasons:</p> <ul style="list-style-type: none"> • AOC A – This site cannot be linked with potential AFFF use or disposal at this time. This site may be evaluated as part of the non-AFFF due diligence effort. • AOC J – The documented use of the septic field was between 1957 and 1967, which is prior to the use of AFFF by the DoD. This site may be evaluated as part of the non-AFFF due diligence effort. • AOC D – This site cannot be linked with potential AFFF use at this time. This site may be evaluated as part of the non-AFFF due diligence effort.