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Subject: Oregon Comments - Draft Final UFP-QAPP Supplement - Coos Head ANG Station -
Date: Monday, August 18, 2025 5:24:00 PM
Attachments: [2025-08-18-DEQComments-June2025 DRAFT-PFAS_QAPP.docx](#)

Good day. Oregon DEQ has reviewed the Draft Final UFP-QAPP Supplement report for the PFAS Site Inspection planned at Coos Head Air National Guard Station. Thank you for the opportunity to review it. Overall, we think the QAPP looks pretty good. Attached are Oregon's comments on the draft document, with some observations and recommendations. I'm sorry that these are not organized in the matrix table you sent. We will strive to follow that format in the future. I have also provided a copy to the Confederated Tribes of the Lower Umpqua and Siuslaw Indians (CTCLUSI). I will ask that they provide any comments they might have directly to TEPA, Lt. Col. Easter (outgoing) and Lt. Col. Stefanik (incoming). Please let us know if you have any questions or concerns regarding our comments.

Thank you for your important work investigating PFAS at Coos Head.

Sincerely,
Don Hanson

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DEQ comments on June 2025 *DRAFT Uniform Federal Policy – Quality Assurance Project Plan Supplement, Per- and Polyfluoroalkyl Substances (PFAS) Site Inspection, Former Coos Head Air National Guard Station, Coos Bay, Oregon*, hereafter referred to as the SI QAPP or QAPP.

Primary commenter, Dan Hafley, DEQ NWR

DEQ completed review of the *DRAFT Uniform Federal Policy – Quality Assurance Project Plan Supplement, Per- and Polyfluoroalkyl Substances (PFAS) Site Inspection, Former Coos Head Air National Guard Station, Coos Bay, Oregon*, hereafter referred to as the SI QAPP or QAPP. The work plan was prepared by Tehama Environmental Consulting Services for the National Guard Bureau and US Army Corps of Engineers and dated June 2025. DEQ received the document via email on July 31, 2025.

Our comments on the SI QAPP follow.

General Comment #1. In general, the proposed sampling effort appears sound and reasonably comprehensive regarding the potential for PFAS releases associated with historical AFFF storage, training, etc. It does not address non-AFFF sources of PFAS.

General Comment #2. It would be helpful to summarize previous environmental investigation and cleanup activities at the site. We understand the focus of the SI is to identify PFAS releases but note that there have previously been significant non-PFAS Installation Restoration (IR) related contaminant releases and cleanup conducted by the Air National Guard and the Navy. For example, Table 10-1 identifies the (likely) disposal of waste oil and solvents through site drains, (AOC E – Sludge Drying Beds) and discharge of diesel to ground surface in the former Fire Training Area (AOC K). There is also brief discussion of 2013 (non-PFAS) sediment removal at PRL 2 and 3.

If non-PFAS contaminants including petroleum and solvents are observed during SI sampling, for example visibly-impacted soil or free product or sheen in temporary wells, this should be noted in field logs and summarized in the reporting of SI sampling results.

Worksheets #3 and #5, Page 5. Don Hanson in DEQ's Western Region office should be identified as the primary point of contact for DEQ. Hafley and Van Glubt can remain as secondary contacts. We further recommend that a CTCLUSI representatives and their legal counsel be included in future site-related communications as a property owner. They are:

- Jeremy Doze, jdoze@ctclusi.org
- Holley Carroll, hcarroll@ctclusi.org, and
- Garret Gray, ggray@ctclusi.org
- Dan Ray-Bear, Rey-Bear McLaughlin, LLP, dan@rbnindianlaw.com

Worksheet #10, Geology and Hydrogeology, Page 6. The discussion of groundwater gradient is very brief, confined to a single sentence at the end of the section. The basis for the surmised west-northwest groundwater gradient should be discussed, along with whether any seasonal variability is expected. In general, DEQ believes that gradient is best determined through installation of permanent wells and/or piezometers and collection of groundwater elevation data for a minimum of four quarters.

Land Use and Exposure Profile, Water Wells, Page 10. We recommend inclusion of (19 cited) well logs in the SI Report.

Worksheet #17, Soil Borings, Page 13. In general, DEQ recommends that surface- and near-surface soil samples be collected as multi-point composites or incremental samples if the purpose is to a) identify the presence or absence of PFAS, and b) assess exposure risk. At a minimum, we suggest that surface soil samples proposed for the site be collected as multiple composites within the area of potential release.

Groundwater Sampling – Seeps, Page 16. DEQ recommends collection of seep samples regardless of the conditions that are encountered (e.g., drainage above the seep) given the importance of these samples. If necessary, results can be considered qualified.

Soil Boring and Temporary Monitoring Well Abandonment, Page 16. In selecting a bentonite product for well abandonment, please note that some coated bentonite pellets may contain PFAS. See <https://www.same.org/tmearticle/determining-the-presence-of-pfas-in-coated-bentonite-pellets/> for further information.

Worksheet #18 and Figure 3 (Planned Sample Locations). Notably for PRLs 4, 5, and 6, investigation consists of 1 boring within the PRL, and 2 borings outside of the PRL to the west-northwest. This is presumably based on the groundwater flow direction being surmised as west-northwest (see Worksheet #10). The QAPP would benefit from further discussion of the *justification* for soil and groundwater sampling locations.