

Responses to Comments for the							
Draft Final SI Report - ARNG PFAS Program: Biak Training Center, Oregon							
Response Code: A = Agree with comment D = Disagree with comment C = Comment requires clarification							
Comment Number	Commenter	Page(s)	Section	Line(s)	Comment	Response Code	Response
TECHNICAL COMMENTS							
1	DEQ	2-4	2.2.2 Hydrogeology	392-393	This section note the presence of seven privately owned domestic wells located approximately 1 mile to the northwest of the site. DEQ notes, however, the presence of several additional nearby wells in Figure 2-3, particularly to the northeast and southeast of the site. We suggest all domestic wells within 1 mile of the site be discussed for completeness, particularly as some of the unmentioned wells appear to be downgradient of the site.		
2	DEQ	5-3	5.3 Permanent Well Installation and Groundwater Sampling	691-692	This section indicates that the two permanent monitoring wells installed during this investigation are within or downgradient of potential sources areas. However, Figure 5-1 indicates that while well BTC-MW002 was installed within AOI 2, the two wells appear to be cross or upgradient of AOI 1 and AOI 3. As a result, it is difficult to evaluate whether potential groundwater impacts at the site were fully evaluated.		
3	DEQ	6-1	6.1 Screening Levels	820	DEQ notes that EPA Regional Screening Levels for soil developed for the protection of groundwater ("Protection of Groundwater SSLs") are not included. Without their use, we consider screening to be incomplete. We note that PFOS, PFHxS, and PFNA SSLs were exceeded in AOI 1 and AOI 2 surface soil and the PFOS SSL was exceeded in AOI 2 deep soil.		
4	DEQ	6-1	6.1 Screening Levels	820	DEQ notes that discussion and screening was limited to five PFAS target analytes per DOD guidance. Analysis for a sixth potential target analyte - HFPO-DA (GenX) - was not completed because screening values were established after SI planning and execution. However, additional PFAS were analyzed, though not discussed in the report. As future regulatory actions and screening levels may consider PFAS beyond the 5 discussed in the report, consider including a brief discussion of the results of the other PFAS analyzed.		
5	DEQ	6-3	6.4.1 AOI 2 Soil Analytical Results	890	As briefly noted in Section 6.4.1, PFOS was detected at 0.144 ug/kg at 94-96' bgs. It is unclear whether this is thought to be attributable to cross-contamination through drilling or indicative of contamination present at depth. DEQ notes that PFOS was not detected in the shallower or deeper samples from this location. More discussion is requested, including tying the sampling depths to specific geologic materials encountered during drilling.		

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6	DEQ	8-1	8.2 Outcome	1033-1046	Due to the cross and upgradient location of the installed monitoring wells to two of the three AOIs and the exceedances of some PFAS SSLs, DEQ does not agree that there is enough site information and data to determine further evaluation is not warranted. However, we recognize the lack of groundwater detections, low magnitude of soil detections, and the very deep groundwater in the area indicate likely a low risk of PFAS exposure from the site.		

EDITORIAL COMMENTS									
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