



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5263
FAX (503) 229-6945
TTY 711

March 9, 2026

via electronic delivery

Lt Col Lydia Stefanik
Acting Chief, Environmental Division, National Guard Bureau
3501 Fetchet Avenue
Joint Base Andrews, MD 20762

RE: DEQ Review: Relative Risk Site Evaluation
Kingsley Field Air National Guard Base
ECSI #816

Dear Lydia Stefanik:

The Oregon Department of Environmental Quality (DEQ) reviewed the Relative Risk Site Evaluation (RRSE) and associated public notice language created for Kingsley Field Air National Guard Base (ECSI #816) and provided to DEQ on February 12, 2026. The RRSE evaluated site surface soil and groundwater at individual potential release locations (PRLs) and categorized as low, medium, or high relative risk. Relative risk of groundwater in all evaluated PRLs was categorized as high. Relative risk of soil in four PRLs was categorized as medium, with one PRL categorized as low and one PRL categorized as high.

DEQ's comments are presented below.

1. Aubrey Higginbotham is listed as the RPM in the RRSE as well as the RRSE public notice language. Please consider updating this to a more current contact.
2. The Introduction language notes that EPA issued lifetime drinking water health advisories for PFOS and PFOA as well as health-based regional screening levels for PFBS. DEQ recommends this language be updated to note that in 2024, EPA designated two PFAS as federal hazardous substances and issued legally enforceable drinking water standards, or Maximum Contaminant Levels, for six PFAS compounds.
3. The RRSE was completed for PRLs 1-6. Please clarify why the additional areas investigated during the Supplemental SI were not included.
4. Please clarify why only PFOS, PFOA, and PFBS are included in the Contaminant Hazard Factor (CHF) calculations. DEQ notes the McNary Army National Guard RRSE included all six compounds with EPA MCLs. Given that all are scored out of 100, including less compounds biases the score lower.

5. Please clarify the source of the comparison values used in the CHF calculations.
6. Receptor Factors (RFs) for the soil worksheets are categorized as Limited (Low), except PRL 6 which is categorized as Potential (Medium). However, the Brief Description of Receptors portion of the Site Summary for all PRLs identify receptors that have access to the area. As such, the soil RFs for all the PRLs should be categorized as Identified (High) or at least Potential (Medium).

If you have any questions or concerns regarding these comments, please contact me by email at Sarah.VanGlubt@deq.oregon.gov or by phone at (503) 709-8253.

Sincerely,

Sarah Van Glubt

Sarah Van Glubt
Project Manager & Data Analyst
Northwest Region Cleanup Section

cc: Dan Hafley, DEQ
Ann Farris, DEQ
Project File – ECSI #816