

LOWRY AIR FORCE BASE

FINAL TRANSITION PLAN II, AS AMENDED JULY 31, 2008

VII. SOILS MANAGEMENT PROGRAM

This Soils Management Program (SMP) is being submitted in accordance with Paragraph 23a.ix of the Consent Agreement. This SMP will be implemented as a precaution to address unknown conditions encountered during soil disturbing activities, including but not limited to excavation, construction, installation and maintenance of utilities, and other intrusive activities that may lead to the discovery of environmental conditions that require characterization, investigation or remedial actions at the LAFB. LAC has drafted a site-specific Health and Safety Plan for field operations, performed under this program by LAC employees.

The SMP is organized as follows:

- Section A provides a brief background of the environmental issues at LAFB, and explains the need for a soils management program.
- Section B identifies the various parties and stakeholders and responsibilities of these parties as defined under the Consent Agreement.
- Section C addresses identification of potential contaminants of concern associated with historic activities at LAFB.
- Section D addresses protocols for construction/maintenance projects that involve the disturbance of soil, including construction oversight activities, reporting of suspect soil, and annual training sessions for workers.
- Section E addresses protocols for suspect contaminated soil, including the process for investigation, soil sampling and characterization, methodology and frequency, excavation and removal requirements, cleanup levels, and disposal procedures for soils that contain hazardous materials or solid waste.
- Section F addresses requirements that need to be fulfilled in order to achieve closure and/or notice of completion.
- Section G addresses LAC's program for annual training on the SMP.

The SMP is to be used as 1) a project planning tool for future soil disturbing activities throughout LAFB as defined in the Consent Agreement; 2) as a communication tool to assure that the CDPHE, the USEPA, and other stakeholders understand the approach and timing of LAC's planned activities; 3) a tool to generate discussion so that LAC understands the needs and requirements of CDPHE, USEPA, and other stakeholders; and 4) to provide a framework to achieve the goals of the Consent Agreement including "seeking ways to accelerate corrective actions and eliminate unnecessary tasks and reviews by facilitating a close working relationship between all parties."

The SMP is not intended to provide detailed information on any subject, but is intended to identify and provide guidance on addressing potential unknown soil contamination that may be encountered during soil disturbing activities. Each of the activities that may be performed in conjunction with this Program may be expanded and detailed in a series of Work Plans or other interim actions as directed by CDPHE, and prepared in accordance with the Consent Agreement.

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A. BACKGROUND

Numerous basewide assessments/investigations have been performed or are ongoing for the LAFB, including those presented below. This section provides a summary of investigations and remedial actions and a brief overview of the current LAFB soils management program, including the implementation of the Lowry Asbestos in Soils Decision Tree (Lowry Decision Tree).

1. Status of Investigations and Remedial Actions at LAFB

The most detailed explanation of the status of investigation and remediation activities at LAFB is presented in the RFA, performed by the Air Force, and submitted to CDPHE in January 2005. Table 3-6 from the RFA provides a list of the investigations performed to date. Response actions have been completed at many environmental sites at the LAFB as described in the RFA. These actions include closure of the former base landfill, removal of soil containing petroleum products, PCBs or PAHs, and closure of numerous storage tanks.

Other sites have undergone investigation and are currently in the response action or remediation and cleanup phases, meaning that regulatory site closure has not yet been achieved. Current response actions planned or underway include: OU5 groundwater investigation and remediation; the FTZ soil remediation; the OFR soil and MEC remediation; closure of OU2 located in the south-central portion of the LAFB (awaiting approval of closure documents); groundwater remediation and monitoring at Building 606; investigation and potential remediation of mercury in soil at Building 898; abandonment of former water supply wells at former Buildings 950 and 1435; and additional asbestos investigation and removal actions associated with the LAFB NWN. In addition, the RFA recommended several buildings or categories of buildings for further investigation, which are incorporated in the Consent Agreement for additional investigations and potential corrective actions.

2. LAFB Current Soils Management

In October 1997, the Air Force and the LERA implemented the "Revised Final Waste Management Plan for Lowry Infrastructure Projects" (WMP) prepared by Parsons Engineering Science, Inc. The current WMP applies only to the LERA and its subcontractors. The WMP established practices to be followed for handling contaminated materials that may be encountered during all construction activities conducted by the LERA.

Since the implementation of the WMP, the LERA has been successful in developing over 70% of the former base in conjunction with the Air Force's environmental cleanup projects; and approximately 700 acres will be developed under the privatized environmental program. Portions of this property were contaminated by historical Air Force activity.

In addition to the WMP, the LERA has implemented the Lowry Decision Tree with regard to unknown discoveries of asbestos in soil. This Decision Tree is provided as Exhibit 6.

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B. ROLE AND RESPONSIBILITIES OF THE PARTIES

Close coordination among the parties and stakeholders is necessary to ensure that soil disturbing activities are compatible with the redevelopment and remediation activities. Without proper coordination, workers and the general public could be exposed to contaminants; projects could be easily delayed by environmental problems; and cost overruns could occur. Proper coordination will ensure that soils are excavated, stored and/or disposed in accordance with the SMP and the Consent Agreement.

The roles and responsibilities of the various entities as they are related to soil disturbing activities are outlined below:

LAC – fulfillment of requirements of Consent Agreement, provide construction oversight for all soil disturbing activities (as that term is defined below) ; address discoveries with an expeditious, predictable process for characterization, investigation and remedial activities.

LERA – coordinate with LAC on redevelopment activities.

CDPHE – lead regulatory agency.

Other Stakeholders (Air Force, City and County of Denver, USEPA, City of Aurora) – review of documents; coordination of oversight activities.

C. IDENTIFICATION OF POTENTIAL CONTAMINANTS OF CONCERN

LAFB operated from 1937 to 1994 as an Air Force technical training center. Table 3-1 of the RFA provides a general description of the former facilities at LAFB. The primary mission at LAFB through its 57 years of operational history focused on training Air Force personnel. Based on the operational history, training programs at LAFB focused on armament and photographic training. However, a variety of base-related operations such as routine aircraft overhaul and maintenance (prior to 1966) as well as facility maintenance activities occurred prior to base closure. The potential contaminants of concerns identified in this section are summarized based upon the RFA, which examined the base operations and an understanding of Air Force standard operating procedures and programmatic Air Force knowledge.

The RFA divided the identification of potential contaminants of concern into those associated with training programs and those associated with daily base operations. As for training programs at LAFB, chemicals and materials were generally used in quantities appropriate for instructional purposes, including the use of mockups. The types of chemicals that were potentially used, stored, and disposed of for training purposes included volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), radionuclides, metals, petroleum-based products, explosives, and ordnance-related materials.

The training programs and the facilities associated with that training listed below are an indication of the various training programs throughout the operational duration of LAFB that may have resulted in potential environmental concerns, and include:

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Armament-Related Training (including small arms): Facilities where personnel were trained on the proper maintenance, handling, storage, and loading operations for conventional weapons. Potential contaminants of concern include petroleum, oil, and lubricant (POL) products, organic chemicals, heavy metals, and solvents.

Chemical Warfare Training: Facilities where personnel were trained in chemical warfare including incendiary control, decontamination, and first-aid training for gas casualties. Potential contaminants of concerns include tear gas, radiological, POL products, solvents, organic chemicals, and heavy metals.

Fire Fighting Training: Open areas, vehicle and aircraft mockups, and buildings used to train personnel on extinguishing fires. Potential contaminants of concern include flammable material used to fuel fires (POL, spent solvents and off-spec fuels); water and chemical based foams, powders used to extinguish fires (organic chemical); and, dioxins generated during chlorinated-fuel combustion.

Flight Training: Facilities associated with flight training. Potential contaminants of concern include POL products and solvents.

Missile Training (guided and ICBM): Facilities associated with missile (e.g., Snark, Titan, and Peacekeeper) training and inspection. Potential contaminants of concern include radiological, POL products, solvents, organic chemicals, and heavy metals.

Ordnance Training: Facilities associated with small and medium-caliber (i.e., 20mm arms firing ranges, skeet and trap ranges, aircraft machine gun "pits," and ordnance storage facilities). Potential contaminants of concern include radiological, POL products, solvents, organic chemicals, and heavy metals.

Photography and Cinematography Training: Facilities associated with the development of film and maintenance of photography equipment. Potential contaminants of concern include POL products, radiological, organic chemicals, and heavy metals.

Precision Measurement Equipment Laboratory (PMEL) Training: Facilities associated with field-level maintenance and calibration of test, measurement, and diagnostic equipment (TMDE). Potential contaminants of concern include radiological, mercury, and hydrocarbons.

In addition during its operational existence, LAFB was comprised of over 1,000 facilities (e.g., buildings, structures, or areas) that supported training, maintenance, and other missions. Although the initial training facilities were located in the western portion of the base, the tremendous expansion experienced in a relatively short period of five (5) years (during World War II) led to the construction of additional training facilities in the eastern portions of the base. A large infrastructure was developed to support and sustain a residential and working population that ranged from less than 200 to more than 10,000 people annually. These facilities included gas stations, garages, machine shops, hobby facilities, outdoor maintenance facilities, steam plants, and steam lines for heating. Other features of the infrastructure that are relevant to environmental concerns included storage and warehousing of materials and chemicals, waste accumulation facilities, and onsite disposal facilities. Other prominent features of the

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infrastructure were the sewer lines or septic systems, sumps, oil-water separators, and floor drains, as these are potential release points to the subsurface. Generally, potential contaminants of concern include fuels used in emergency power generating units; associated underground storage tanks, pipelines, and above ground storage tanks; POL products; solvents; organic chemicals; paints; asbestos; pesticides, herbicides, PCBs, other organic chemicals, and heavy metals.

D. PROCEDURES FOR CONSTRUCTION OVERSIGHT AND REPORTING OF SUSPECT MEDIA OR DEBRIS

In order to fulfill the purposes of this plan and to mitigate any potential release or threatened release of hazardous substances as a result of its activities, LAC will provide construction oversight services for all soil disturbing activities at LAFB, within the boundaries defined in the Consent Agreement (excluding the DFAS property west of Quebec Street). LAC is coordinating closely with the LERA on notifying potential purchasers of the property of the SMP, and the requirements of LAC under the Consent Agreement. LAC is entering into separate oversight agreements with each developer and the Colorado Community College System (CCCS) on the former HEAT campus in order to execute this task, and address the issue of responsibility and liability for potential discoveries on each respective parcel. The SMP shall be an Exhibit to all Oversight Agreements.

Construction oversight services include the necessary observation and documentation of soil excavation activities within the geographic boundaries of LAFB, excluding the DFAS property west of Quebec Street, with the intent of identifying any unknown environmental contamination and preventing potential releases to the environment. This oversight shall include full-time visual or olfactory observations during any and all soil disturbing activities (as that term is defined below) during the project as defined in the Consent Agreement, unless a waiver is approved as further described below.

Pursuant to section 1.2 of the Regulations Pertaining to Solid Waste Sites and Facilities, 6 CCR 1007-2, "soil-disturbing activities" means "excavation, grading, tilling, or any other mechanical activity used to disturb the soil." Soil disturbing activities include, but are not limited to, excavation, construction, installation and maintenance of utilities, and any other intrusive activities that may result in the discovery or release of environmental contamination that requires additional investigation, characterization or remediation. Excavation means foundation excavations, underground utility installations, and other excavations of the land surface.

Demolition of buildings and other structures are regulated under the Colorado Air Quality Control Commission Regulations, 5 CCR 1001-10, Regulation 8 (Regulation 8); however, demolition does involve soil-disturbing activities, as that term is defined in the Solid Waste Regulations. The owner/developer of the property is responsible for all activities associated with demolition, including compliance with Regulation 8, proper characterization of materials for disposal and abatement of buildings.

In addition, LAC will utilize roving construction oversight inspectors throughout the day to ensure that the above-ground demolition process does not result in the identification of any unknown subsurface environmental contamination and to prevent any potential releases to the

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environment. The following activities are governed by Regulation 8 and do not require LAC oversight to the extent that they do not involve the surface or subsurface soils where historical environmental contamination may be present: (1) asbestos abatement of buildings or structures; (2) demolition of above ground structures; (3) the movement of equipment or debris across the surface during the demolition of above ground structures; (4) removal of building debris from the site following the demolition of above ground structures; and (5) final soil clearance pursuant to Regulation 8.

If during the above-ground demolition process, conditions are observed by LAC that indicate the potential to create environmental contamination from the building materials or debris, LAC will notify the Air Pollution Control Division of CDPHE, and CDPHE will determine the appropriate response action and notify the owner/developer of such actions.

Examples of other soil disturbing activities or excavations that routinely occur at LAFB, and are intended to be covered by the terms of the SMP, include but are not limited to:

1. foundation excavations;
2. underground utility installations (including wet utility installation (deep), dry utility installation (shallow) and utility tie-ins);
3. bulk grading;
4. foundation backfill;
5. subsurface demolition;
6. drilling and boring activities (to observe the soil cuttings brought to the surface. LAC will verify the scope of activities and will spot check the cuttings); and,
7. any other soil disturbing activity, except to the extent than any or all of these activities have been excluded below or are provided a waiver, as further described below.

Soil disturbing activities exclude the following:

1. normal maintenance and operation associated with the current ownership of previously developed or redeveloped commercial or residential property;
2. site preparation (which means the initial land preparation activities for construction i.e. clearing and grubbing of vegetation and surface impediments, mowing, removal of large surface debris, tree and shrub removal and survey staking);
3. backfilling for grade or fine grading (so long as the backfilling or fine grading material originates from a location off-site of LAFB or has been previously observed under the construction oversight protocols of this SMP during the excavation in soils and determined through visual and olfactory observations not to contain environmental contamination);
4. utility tie-ins in soils previously disturbed and determined through visual and olfactory observations not to contain environmental contamination;
5. curb and gutter installation, sidewalk installation, residential irrigation installation in soils previously disturbed and determined through visual and olfactory observations not to contain environmental contamination;
6. fence, patio and light fixture installation;
7. maintenance of previously installed utilities;

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8. park landscaping in soils previously disturbed and determined through visual and olfactory observations not to contain environmental contamination;
9. normal maintenance and operation of the golf course;
10. maintenance of existing parks (including repairs and maintenance to sprinkler systems);
11. planting of flowers, trees, sod and shrubs;
12. maintenance and repair of existing roads and right of ways, including utilities located underneath these areas, not located in the NWN of LAFB; and,
13. soils or other materials that originate from a location other than LAFB.

It is understood that during construction activities at LAFB, soils in some areas may be disturbed repeatedly, i.e., backfilling soils after bulk grading, installing patios after an area has been excavated, etc. Therefore, construction oversight by LAC is not required for soils previously disturbed and determined through visual and olfactory observations (and in accordance with Paragraph 1 below – dealing with Oversight Procedure) not to contain environmental contamination. LAC will maintain documentation of all such construction oversight determinations through its database and submittal of the daily oversight schedule.

LAC may request a waiver of construction oversight for any soil disturbing activity. All waiver requests shall include the following information: a map delineating the area for which the waiver request applies; documentation of previous remedial activities, previous construction oversight, visual inspections, and redevelopment activities such as addition of fill, installation of utilities, etc. Full-time construction oversight shall be provided for all soil-disturbing activities, not specifically excluded above, until such time that a waiver is granted by CDPHE in accordance with this provision.

- Except in the case of an emergency, the oversight process will be implemented when a dig notification is provided to LAC (which should be submitted anytime soil disturbing activities are planned) by telephone or email. As noted above, LAC will have separate agreements (Oversight Agreements) with various future owners, including the LERA and CCCS, which articulate the notice requirement (between 24 to 48 hours advance notice).
- LAC will utilize roving construction oversight inspectors to monitor general construction activities throughout the site. In addition, LAC will provide these inspectors for soil disturbing activities lasting only a short period of time or less than a full working day. However, these inspectors shall be present full-time during all actual soil disturbing activities.
- LAC will perform a review of existing environmental reports and historical use information to identify for the Owner and the CDPHE any potential environmental contamination issues associated with these locations. Activities associated with this task will be documented in the monthly progress report to the CDPHE.
- In emergency situations, such as a broken water line or utility repair, the Owner will notify LAC as soon as practicable, (but in no event no later than 48 hours after the emergency occurs) and LAC will inspect the excavation as soon as practicable.

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1. Oversight Procedure

a) LAC will provide an oversight technician (technician) with a State of Colorado asbestos building inspector certification (or other appropriate certification, i.e. Abatement Worker or Air Monitoring Specialist) and OSHA 40-hour HAZWOPER training, to perform field monitoring for all possible environmental contamination. LAC will also utilize roving technicians to provide construction oversight as discussed above. The technician will screen for the usual and customary indicators of contamination, such as discolored soil, visible free product, and odor, as well as friable and non-friable asbestos debris. If required by this SMP or CDPHE, the technician will screen for potential hazards to human health using a photoionization detector and/or field detector tubes and set up appropriate safety control measures if necessary.

2. Reporting Potentially Contaminated Media

- a) If the field technician suspects or detects potentially contaminated media, he or she shall immediately notify the LAC Oversight Coordinator or designee:
- LAC Oversight Coordinator Telephone: **303-972-6633**
- b) The Inspector will take appropriate actions to prevent exposures to workers and surrounding areas from any suspect materials. Action levels will be set based on specific equipment and calibration, and will meet the minimum described in the LSAL, attached as Table 5-1, and in accordance with the Response Action Matrix, attached as Table 7-1.
- c) The LAC Coordinator will confirm the observations and determine whether additional investigation must be performed before construction activities resume.
- d) Activities may continue if the potentially contaminated area is isolated or in one distinct area of the disturbance, and will remain undisturbed by continued work in other areas of the site.
- e) The LAC Coordinator will verbally notify the CDPHE Project Manager for LAFB of the observations based on Response Matrix, attached as Table 7-1, and follow up the verbal notification by email. LAC will also notify the Owner of the property under its Oversight Agreement.

E. GENERAL PROTOCOLS FOR HANDLING PARTICULAR CONTAMINANTS OF CONCERN

1. Protocols for Handling Suspect Contaminated Soils (Non-asbestos)

If potentially contaminated soils are encountered during soil disturbing activities or excavation that is not associated with asbestos, the following procedures will be followed:

- a) Soil Disturbing Activities or Excavation

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- i) When potentially contaminated soil is encountered during soil disturbing activities or excavation under LAC oversight, the procedures outlined in the Response Matrix will be initiated. Initially, a determination as to whether the soil disturbing activities or excavation will continue and an assessment of sampling needs will be made. LAC may excavate these soils for characterization and disposal in accordance with the specifications of the Response Matrix (See Table 7-1).
- ii) After the potentially contaminated soil has been excavated and removed, that soil will be managed as hazardous waste, unless LAC can determine based upon visual and olfactory observations, historical information or field testing that the potentially contaminated soil is non hazardous or sample results determine it is not a hazardous waste.
 - (a) In the event that potentially contaminated soil is hazardous, RCRA requires that all hazardous wastes must be containerized. In addition, RCRA hazardous waste cannot be stored for more than ninety (90) days without written approval from CDPHE. The ninety (90) days begin when the soil is removed from the excavation.
 - (b) In the event that the contaminated soil is contaminated with petroleum, the soil will be handled in accordance with the regulations of the Colorado Department of Labor Division of Oil and Public Safety (See 7 Colorado Code of Regulations sections 1101-14).
 - (c) In the event that the potentially contaminated soil is special waste and/or a solid waste, as that term is defined in RCRA, LAC will address that waste pursuant to the applicable Colorado statutes and regulations.

b) Sample Collection

- i) LAC will collect samples prior to excavation and removal from the potentially contaminated soil in order to characterize the potential contaminant(s). Samples shall be analyzed for applicable waste profile parameters as specified in the Response Matrix and any additional parameters as specified by CDPHE. Samples will be collected according to the protocols listed below and submitted to a laboratory for analysis.
 - (a) The impacted soil shall be collected from locations that appear to be the most contaminated and an appropriate number of samples will be collected to characterize the observed contamination. LAC will consult with CDPHE on the timing and frequency of sampling, and the parameters of the sampling suite.
 - (b) Samples shall be collected by using appropriate personal protective equipment (PPE).
 - (c) Samples shall be collected using appropriate sample containers and preservatives following USEPA protocols.
 - (d) Samples shall be collected practicing appropriate decontamination procedures when necessary.

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(e) Samples shall be collected by practicing the following field quality assurance/quality control (QA/QC) as discussed in Section F of the SMP.

c) Waste Disposal Requirements

Based on laboratory analytical results and comparison of results to the RCRA waste characteristics, a disposal facility will be chosen and the appropriate manifests will be generated for disposal off-site.

2. Procedures for Handling Potential Asbestos Containing Material in Soil

LAFB has two regulatory processes for addressing potential asbestos in soil issues. Both are identified below:

a) LAFB Northwest Neighborhood (NWN):

The NWN is defined as bounded by East 8th Avenue to the south; East 11th Avenue to the north; Quebec Street to the west; and Uinta Way to the east. There are known remedial actions associated with formerly owned Air Force property that will be performed within the NWN pursuant to the Consent Agreement. The scope of those remedial actions will be addressed as approved by CDPHE in a separate work plan under this Transition Plan. In addition, there are ongoing remedial actions by homebuilders in the NWN, as required under the Compliance Advisories issued by CDPHE on April 24th and 30th, 2003.

b) Remainder of LAFB, including within the historical boundaries:

As noted above in Section 2.B. of the SMP, the LERA has implemented the Lowry Decision Tree (Exhibit 6), approved by CDPHE on August 3, 2004. Since this time, the CDPHE has implemented new regulations with respect to asbestos in soil. Exhibit 7, Asbestos Soils Characterization and Management Plan for LAFB, integrates the new regulations and the Decision Tree in order to implement soil management protocols and a process of regulatory closure for asbestos issues. Unknown discoveries of asbestos in soil on the parcels in the NWN after a No Further Action has been issued would be addressed under this plan.

F. REQUIREMENTS TO ACHIEVE CLOSURE (NON-ASBESTOS CONTAMINATED SOILS)

After non-asbestos contaminated soils have been remediated in accordance with Section C of the SMP, including any additional requirements implemented at the request of CDPHE, confirmatory soil samples will be collected from the floor and walls of the excavation. LAC will discuss with CDPHE the appropriate number of samples to be collected to characterize the excavation for closure. At a minimum, one sample should be collected from each of the four walls and one sample from the floor of the excavation.

1. Quality Control Requirements

QC samples will be analyzed as specified below:

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QC Type	Frequency
Trip Blank	One per cooler containing VOCs
Field Duplicate	10%
Matrix Spike/ Matrix Spike Duplicate	10%
Equipment Blank	One per activity if equipment is reused

One trip blank will accompany each cooler of samples sent to the laboratory for analysis of VOCs to assess the potential introduction of contaminants from sample containers or during the transportation and storage procedures. Equipment blanks will not be collected if new sampling equipment will be used for every sample.

To assess precision of the sample collection process, field duplicate samples will be collected simultaneously or in immediate succession, using identical recovery techniques, and treated in an identical manner during storage, transportation, and analysis. The sample containers are assigned an identification number in the field such that they cannot be identified as duplicate samples by laboratory personnel performing the analysis (blind duplicate). Specific locations are designated for collection of field duplicate samples prior to the beginning of sample collection. Field duplicates will be collected at a frequency of one in 10 samples collected.

2. Laboratory Analysis

These samples will also be submitted to the laboratory for quick turn-around to obtain results in a timely manner in order to determine the appropriate additional remedial action and disposal options.

The samples will be analyzed for a wide range of analyses, listed in the Response Matrix and any site specific additional analyses that CDPHE may require (Table 7-1). Table 5-1 provides the analytes for each group. Based on the historical knowledge and operations of a particular site, the analyses may be limited or expanded to include the appropriate analytical groups, such as VOCs, SVOCs, heavy metals, etc.

If petroleum products are found, the analytical suite will include total petroleum hydrocarbons (TPH), BTEX, and PAHs as required by the Colorado Department of Labor and Employment, Division of Oil and Public Safety (OPS). A more detailed description of the requirements for petroleum-contaminated soil is presented below.

a) Petroleum products

If petroleum products are observed, LAC will follow the *Colorado Department of Labor, Oil Inspection Section, Owner/Operator Guidance*, dated May 2005.

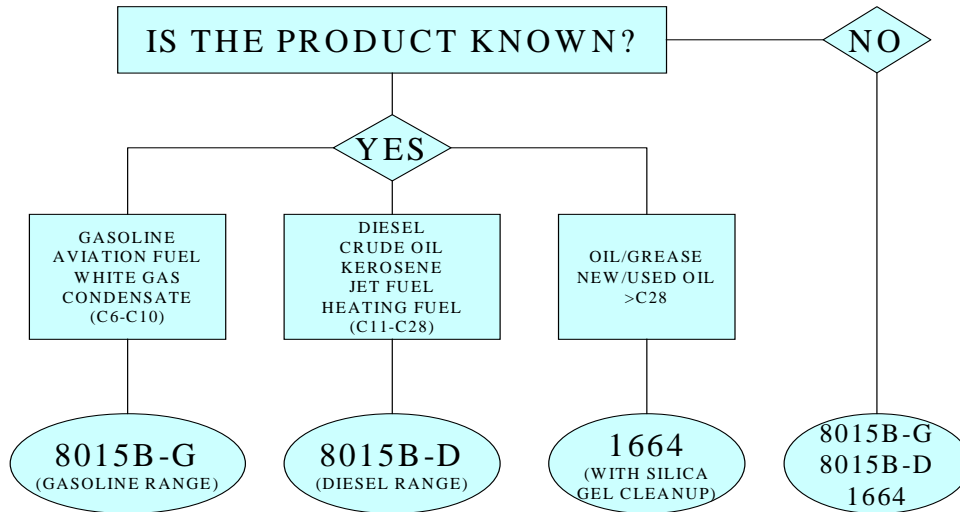
All samples collected are required to be analyzed for BTEX. These compounds should be analyzed using USEPA methods 8021 or 602 as presented in SW-846, or an equivalent method approved by the OPS. EPA method 8260 may also be appropriate, especially in cases where a waste oil tank is/was present.

All samples collected are required to be analyzed for TPH. TPH should be analyzed using USEPA methods 1664 or 8015B as presented in SW-846, or an equivalent method approved by

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the OPS. The following flow chart may be used to determine the appropriate analytical method based on the product type at the site.

ANALYTICAL METHODS FOR TPH



If TPH concentrations exceed 500 parts per million (ppm), and BTEX concentrations are below the site cleanup goal, then a sample taken from the location where the TPH concentration was the highest must be analyzed for the priority PAHs. The priority PAHs are listed below:

- Acenaphthene
- Acenaphthylene
- Anthracene
- Benzo(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene
- Benzo(g,h,i)perylene
- Benzo(k)fluoranthene
- Chrysene
- Dibenzo(a,h)anthracene
- Fluoranthene
- Fluorene
- Indeno(1,2,3-c,d)pyrene
- Naphthalene
- Phenanthrene
- Pyrene

The OPS requires that soil samples for laboratory analysis be collected from the locations most likely to be contaminated. At a typical UST closure site, samples must be collected from under the tanks, near the dispensers and along the dispensing lines, in areas where staining or odors are noted, and/or in areas with elevated field instrument readings.

If the concentrations are lower than the Tier 1 RBSLs for all completed pathways, and the TPH threshold has not been exceeded, a No Further Action Required designation may be requested. If the source concentrations exceed the Tier 1 RBSLs, the owner/operator may proceed to Tier 1A, or to a CAP, which may include proposed corrective actions and a Tier 2 evaluation.

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3. Data Evaluation

The LSAL (Table 5-1) will be used to compare to sample results. If soil concentrations are below these values, the site may be recommended for no further action. If there are exceedances of these values, further actions such as investigative sampling, risk assessment, remedial actions, or additional excavation with confirmation sampling may be recommended. If additional excavation is required, LAC will submit modifications to CDPHE to address any additional issues for closure.

In accordance with Paragraph 50 of the Consent Agreement, within ninety (90) days of completion of required corrective actions, LAC will submit a Notice of Completion. The Notice of Completion may include, but not be limited, to the following summarizing the investigation and sampling will be submitted to CDPHE:

- Executive Summary
 - Describe product or contaminant found
 - Show highest concentration of contaminants left in place
 - Compare to Lowry Soil Action Levels and Groundwater action levels, as appropriate
- Site Description with Location Map
- Investigation Description with field observations and Sampling Map
- Data Evaluation with Laboratory Results Table
- Justification for Notice of Completion request
- Appendices including Laboratory reports, chain of custody forms and Disposal Documentation

G. Annual Training

LAC will offer annual awareness training and/or publications to anyone who may be conducting soil disturbing activities at LAFB, through either redevelopment activities or maintenance and repairs of existing systems, including Owners and their workers at LAFB. Such training will focus on the following topics:

- Summary of the SMP and any amendments thereto,
- Any additional requirements mandated by local, State or Federal law, and
- Any modifications to the known conditions at the site.

LAC will publish such meeting dates in conjunction with CDPHE and the LERA. The training offered by LAC is intended to provide the public with general information relating to its activities and programs at LAFB. This training is not intended to replace or substitute for notification or communication with LAC on specific oversight activities and protocols regarding discoveries of potential environmental issues at LAFB. LAC will publicize the training through available channels and through contractual agreements with property owners.