Former Fort Ord Operable Unit (OU)-1 – Base Closure Team (BCT) Meeting Status Update

Groundwater Remediation, Well Destruction, and Treatment Plant Decommissioning Marina, California 20 February 2015

OU-1 On-Post Activities for January 2015

Prepared by HydroGeoLogic, Inc., Roy Evans, Project Manager

Attendees: (to be revised after meeting)

Individual	Attended?	Individual	Attended?
James Specht, USACE		Grant Himebaugh, RWQCB	
Teresa Rodgers, USACE		Edward Ticken, AMEC	
Alex Kan, USACE		Jeff Fenton, AMEC	
Bonnie McNeil, USACE		Derek Lieberman, Ahtna	
Cory Koger, USACE		Brad Clark, Ahtna	
William Collins, BRAC		Holly Dillon, Ahtna	
Tom Ghigliotto, Chenega ¹		Kevin Ghalambor, Burleson	
Melissa Broadston, Chenega ¹		Peter Kelsall, CB&I	
Bart Kowalski, Chenega ¹		Steve Crane, Gilbane	
Cary Stiebel, Chenega ¹		Erin Caruso, Gilbane	
Lewis Mitani, EPA		Lindsay Alexander, Gilbane	
Martin Hausladen, EPA		Larry Friend, Gilbane	
Kimberly Gettman, DTSC		Kevin Siemann, Gilbane	
Franklin Mark, DTSC		Roy Evans, HGL	
Min Wu, Ph.D., DTSC		Kevin Wierengo, HGL	
Edward Walker, DTSC		Gage Dayton, Ph.D., UCSC	
Steve Sterling, DTSC			
X = attended in person or by te	elephone; blan	k indicates absent from the meeting	ng

¹Chenega staff supporting the BRAC

Ahtna = Ahtna Engineering Services

BRAC = Base Realignment and Closure Fort Ord Office

CB&I = Chicago Bridge & Iron, Inc.

DTSC = California Department of Toxic Substances

Control

EPA = U.S. Environmental Protection Agency

HGL = HydroGeoLogic, Inc.

RWQCB = Regional Water Quality Control Board UCSC = University of California, Santa Cruz

USACE = U.S. Army Corps of Engineers

OU-1 Treatment Plant Operations

HGL informed the Base Closure Team (BCT) at the October BCT meeting that the Northwest Treatment System (NWTS) shut down on 15 October 2014. As agreed at that meeting, the plant will remain offline pending review of the results from the December sampling event. PG&E reconnected power to the system on 16 January 2015. HGL attempted to restart the system after power was restored. The programmable logic control system appears to be undamaged but the variable frequency drive (VFD) for the transfer pump (connecting the influent holding tank to the treatment vessels) is inoperable. HGL is working with the Army to adjust the current contract

to obtain the necessary replacement parts. After the transfer pump VFD is replaced, HGL will determine if there was any other damage and make necessary repairs to restore operability.

There was minimal rainfall in January and therefore no significant accumulation in the NWTS containment basin. HGL inspected the NWTS and / or performed repairs / testing on 8, 16, and 26 through 28 January 2015.

Since system startup in 2006, the NWTS has pumped approximately 212 million gallons of groundwater and removed approximately 6.0 pounds of total volatile organic compounds, primarily trichloroethene (TCE).

OU-1 Groundwater Quality Data

HGL collected samples from monitoring wells MW-OU1-61-A and MW-OU1-88-A on 22 December 2014. The validated December results confirmed the preliminary results without qualifies. TCE concentrations did not exceed the Aquifer Cleanup Level (ACL) of 5.0 micrograms per liter ($\mu g/L$) in any of the samples collected. The December TCE concentrations are:

- MW-OU1-61-A = 4.2 μ g/L (Duplicate sample = 4.6 μ g/L)
- MW-OU1-88-A = $4.1 \mu g/L$

Tables 1A and 1B show the validated TCE and cis-1,2-dichloroethene concentrations, respectively, found in the extraction wells and treatment system in the September 2014 sampling event. Figure 5.2 from the 2014 Annual Groundwater Monitoring Report shows the September 2014 TCE concentrations and is included for reference in Attachment 1. The next planned sampling event is scheduled for March or April 2015, depending on resolution of comments on the Exit Strategy Technical Memorandum and agency review/approval of the updated UFPP-QAPP.

Reporting/Federal Facility Agreement Schedule

All scheduled submittals have been made for primary and secondary deliverables. The status of submitted and anticipated reports for 2014 is summarized in Table 2. The Draft 2014 Annual Groundwater Monitoring Report was accepted as Final by the regulatory agencies without comment—and no comments were received from the public.

The Draft Exit Strategy Technical Memorandum was submitted on 26 December and is discussed separately in this update. A revision providing flexibility in selecting the analytical method and replacing low flow sampling with the HydrasleeveTM method was distributed to the regulatory agencies by email on 14 January.

OU-1 Weed Control and Rare Plant Monitoring

The 2014 Fort Ord Natural Reserve Impact Assessment and Habitat and Rare Plant Species Survey Results Report was submitted to the Army for distribution on 10 October 2014. HGL presented the findings of this report to the U.S. Fish and Wildlife Service (USFWS) on 27 January 2015.

Site Exit/Closure Strategy

Based on data from the validated September and December 2014 sampling events, TCE concentrations have met the aquifer cleanup level at all OU-1 monitoring wells. The exit strategy is based on demonstrating that the cleanup objectives of the Record of Decision (ROD) regarding human health protectiveness have been met and, therefore, the ROD cleanup goals have been attained. The human health risk corresponding to Chemical of Concern concentrations observed at the site have met the human health protectiveness objectives for several years.

The Draft OU-1 Exit Strategy Technical Memorandum (ESTM) describes the proposed attainment sampling well location network and sampling schedule for the chemicals of concern identified in the ROD and for emerging contaminants perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). During conversations with potential analytical laboratories after the Draft was submitted, it was determined that other sampling and analytical methods may provide equivalent or more accurate results. The revision submitted on 14 January 2015 allowed flexibility to consider HPLC/MS methodology (EPA Method 537, SW-846 Method 8321, or an equivalent method) with method detection limits less than the PHA concentrations. The selected method will be determined in consultation with the analytical laboratory and the Army and with the approval of the regulatory agencies.

Many impeller or bladder pumps used in low-flow sampling contain internal components made with fluoropolymers such as Teflon® and Viton®. Sample tubing is often coated with PFAS-containing materials as well. Thus, there is the potential to introduce fluoropolymer contamination to the samples that could then be incorrectly attributed to the OU-1 site, especially at the low concentration levels that will be used in reporting these compounds. HydraSleeve™ samplers are made from 4-mil polyethylene that are uncoated. Consequently, the revision submitted on 14 January specified using the HydraSleeve™ sampling technique to minimize the potential for false positive analytical results. This method is also more efficient and more directly comparable than low flow sampling methods to the passive diffusion bag method that has been employed at OU-1 for more than a decade.

Agency and public comments on the Draft ESTM are due by 24 February 2015.

Well Destruction and Treatment Plant Demolition

Well destruction within OU-1 is complete pending review of attainment monitoring results.

Action Items:

• HGL will respond to agency and public comments on the draft OU-1 Exit Strategy Technical Memorandum.

Ongoing:

- Submit draft minutes for previous BCT meeting(s)—draft minutes for October through November 2014 were accepted without comment. Thus far, DTSC and EPA approved the draft January 2015 minutes without comment.
- Submit approved final minutes for previous BCT meeting(s) complete through December 2014.

Fort Ord HTW BCT Meeting 20 February 2015

Fort Ord Operable Unit 1 Groundwater Remediation, Well Destruction, and Treatment Plant Decommissioning

ATTACHMENT 1

Reference Table(s) and Figure(s)

Table 1A

TCE in OU-1 FONR Groundwater Remediation System – Performance Monitoring
BCT for Former Fort Ord – 20 February 2015

	FONR Extraction Well (listed from south to north)								Boundary Extraction Well (from west to east)							NWTS								
Began:	Nov-10	Oct-07								Jul-06								NW 15						
Date	IW-10	MV	/ -87		EW-71	1	MW-8	5	MW-46	۸D	EW-63		EW-60	0	EW-6	6	EW-62	2	INFLUE	INFLUENT MIDPOINT EFFLUE			NT	
TCE (µg/L)																								
11/9/07	in r	16			13		19		14		ND		ND		1.7		ND		11		ND		ND	
1/18/08	Used as monitoring well until pump installed in October 2010. Pumping began 03 November 2010.	11			11		8.9		8.2		ND		ND		1.2		ND		6.0		ND		ND	
3/18/08	stal.	11			14		6.7		5.8		ND		0.29		1.5		ND		5.6		ND		ND	
5/27/08	in S No	9.7			18		2.5		6.1		ND		ND		1.8		ND		3.9		ND		ND	
7/21/08	uml 1 03	9.1			14		4.4		3.4		ND		0.78		1.4		ND		3.6		ND		ND	
9/29/08	il pu	9.3		J	15	J	4.3	J	2.9	J	ND		0.90	J	1.7	J	ND		3.8	J	0.19	J	ND	
12/1/08	unti ; be).	5.8			11		2.6		1.6		ND		0.82		0.91		ND		2.7		0.35	J	ND	
1/26/09	ell zing	5.9			10		2.2		1.2		ND		0.48	J	0.78		ND		2.4		ND		ND	
3/9/09	g w g ml	5.8			9.9		2.1		1.2		ND		0.95		0.86		ND		2.7		ND		ND	
6/11/09	rin P	6.9			11		2.4		1.5		ND		0.88		1.7		ND		2.6		0.14	J	ND	
9/15/09)10	6.8			9.4		1.7		0.78		ND		inactive		1.1		0.036	J	2.3		0.35	J	ND	
12/14/09	mo r 2(6.9			7.5		0.84		not sampled		not sampled		inactive		0.94		not sampled	l	2.3		0.65	J	ND	
3/22/10	l as obe	7.2			8.5		0.62		0.55		inactive		ND		0.90		inactive		2.3		ND		ND	
6/21/10	Sed Oct	7.4			6.5		0.90		0.40	J	inactive		0.86		0.58		inactive		2.1		ND		ND	
9/20/10	ם כ	7.7			6.6		0.83		0.35	J	discontinued		0.63		0.49	J	inactive		2.3		not sampled	l	ND	
12/16/10	5.2	6.9			5.2		0.58		0.28	J	discontinued		0.72		0.42	J	inactive		2.6		0.18	J	ND	
3/7/11	5.1	6.0			4.6		0.55		0.60		discontinued		0.87		0.42	J	inactive		2.5		0.59		ND	
6/7/11	4.2	6.1			4.0		0.78		0.63		discontinued		0.76		0.36	J	inactive		2.6		1.0		ND	
9/20/11	4.5	6.2			4.2		1.10		0.38	J	discontinued		0.57		0.36	J	inactive		2.5		1.7		ND	
12/7/11	3.8	5.1			3.7		not	sam	pled		discontinued		inactive		0.27	J	inactive		1.8		2.1		0.13	J
3/15/12	3.7	5.5			3.8		0.70		0.23	J	discontinued		inactive		0.38	J	inactive		0.81		0.32	J	ND	
9/25/12		5.3			4.4						discontinued		inactive		0.19	J	inactive		1.8		0.72	J	ND	
1/8/13		5.4									discontinued		ND		0.19	J	inactive		1.5				ND	
3/27/13		4.8									discontinued		ND		0.23	J	inactive		1.5				ND	
6/26/13		4.4					-				discontinued		-		-		inactive		1.7				ND	
9/18/13		4.7			1.9		-				discontinued		0.17	J	0.31	J	inactive		2.0				ND	
12/17/13	2.8	4.2		[discontinued						inactive		2.1					
3/27/14		3.4	1	4	0.89	Α					discontinued		0.22	J/A	0.29	J/A	inactive		1.7		0.92	J/A	ND	A
6/27/14		3.7					-				discontinued		-				inactive		0.28		0.39	J	ND	
9/2/14	2.2	4.2			0.88						discontinued		0.25	J	0.26	J	inactive		1.0		0.41	J	ND	

ND - nondetect TCE - trichloroethene NWTS - Northwest Treatment System FONR - Fort Ord Natural Reserve

Table 1B
cis-1,2-DCE in OU-1 FONR Groundwater Remediation System – Performance Monitoring
BCT for Former Fort Ord – 20 February 2015

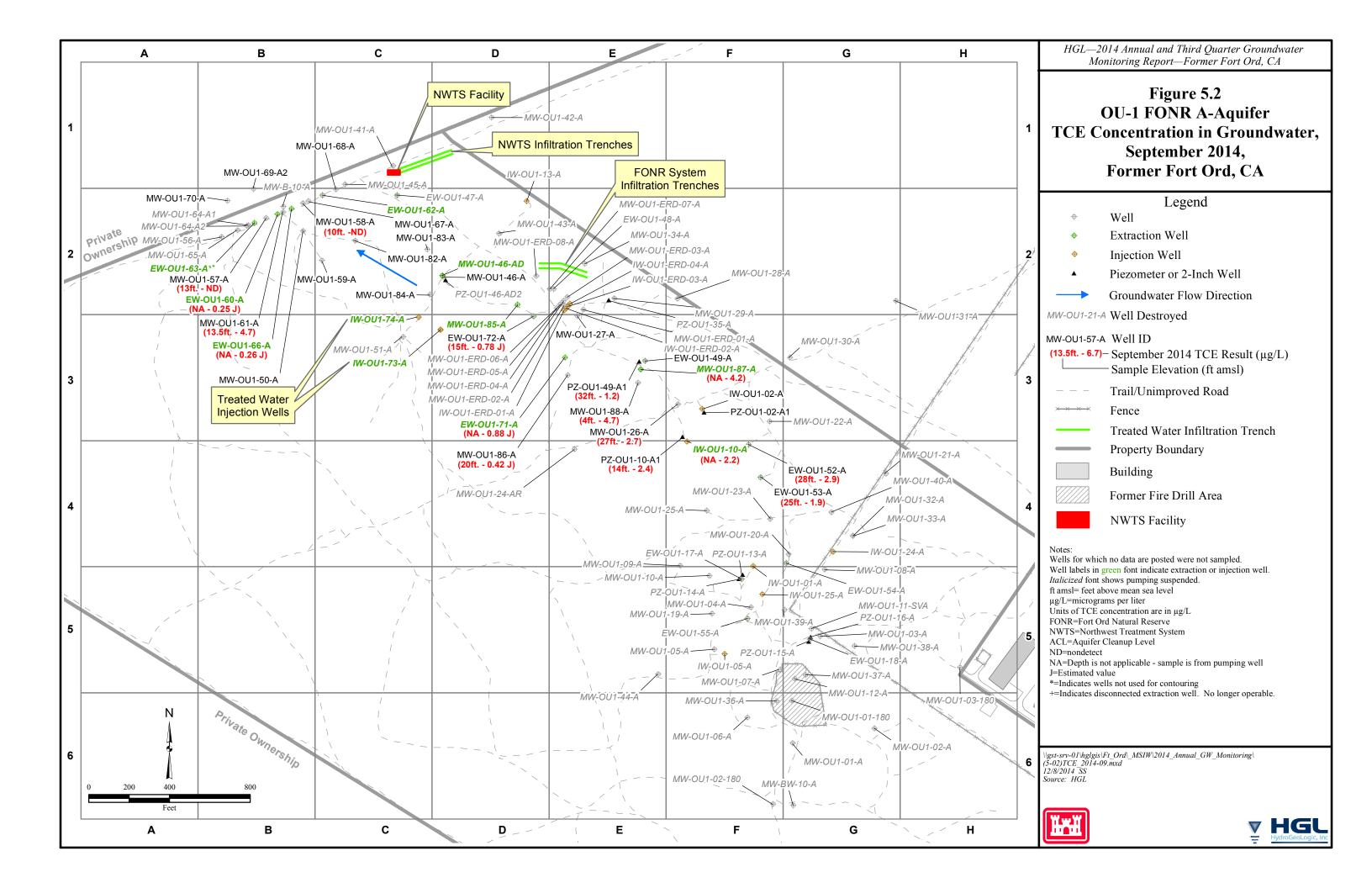
	FONR Extraction Well (listed from south to north)								Boundary Extraction Well (from west to east)							NWTS							
Began:	Nov-10	0	Oct-07								Jul-06						11W 19						
Date	IW-10)	MW-8	37	EW-7	1	MW-8	5	MW-46A	VD	EW-63		EW-60)	EW-6	6	EW-62	INFLUENT MIDPOINT EFFI			EFFLUE	NT	
	cis-1,2-DCE (μg/L)																						
11/09/07	in r		1.9		1.6		2.3		1.70		ND		ND		ND		ND	1.3		ND		ND	
01/18/08	installed in November		1.20		1.40		1.00		1.20		ND		ND		0.11		ND	0.66		ND		ND	
03/18/08	stal		1.20		1.50		0.74		0.63		ND		ND		ND		ND	0.59		0.11		ND	
05/27/08	in C		0.88		2.10		0.26		0.74		ND		ND		ND		ND	0.36		0.21		ND	
07/21/08	um 1 03		0.80		1.50		0.52		0.37		ND		ND		ND		ND	0.41		0.34		ND	
09/29/08	il pi gar		0.99		1.60		0.54		0.30		ND		ND		0.13		ND	0.42		0.42		0.12	
12/01/08	Used as monitoring well until pump October 2010. Pumping began 03 l 2010.		0.67		1.30		0.33		0.21	J	ND		ND		ND		ND	0.27	J	0.37	J	0.19	J
01/26/09	vell un iping 1 2010.		0.63		1.20		0.29	J	0.12	J	ND		ND		ND		ND	0.26	J	0.24	J	ND	
03/09/09	w g mml		0.62		1.20		0.29	J	0.13	J	ND		ND		ND		ND	0.23	J	0.26	J	ND	
06/11/09	orin . P		0.71		1.10		0.30	J	0.13	J	ND		ND		0.14	J	ND	0.24	J	0.28	J	ND	
09/15/09	nite)10		0.80		1.00		0.22	J	0.08	J	ND		inactive		0.03	J	ND	0.22	J	0.37	J	0.03	J
12/14/09	mo r 20		0.67		0.65		0.10	J	not sampled		not sampled		inactive		ND	J	not sampled	0.21	J	0.30	J	0.11	J
03/22/10	l as obe		0.67		0.79		ND		ND		inactive		ND		ND		inactive	0.20	J	0.11	J	0.13	J
06/21/10	Jsec Oct		0.67		0.53		0.14	J	ND		inactive		ND		ND		inactive	0.20	J	0.23	J	ND	
9/20/10	ר		0.66		0.46	J	ND		ND		discontinued		ND		ND		inactive	0.23	J	not sampled	l	ND	
12/16/10	0.55		0.66		0.35	J	ND	J	ND		discontinued		ND		ND		inactive	0.27	J	0.28	J	ND	
3/7/11	0.37	J	0.52		0.28	J	0.11	J	ND		discontinued		ND		ND		inactive	0.23	J	0.30	J	ND	
6/7/11	0.35	J	0.55		0.29	J	ND		ND		discontinued		ND		ND		inactive	0.18	J	0.31	J	0.15	J
9/20/11	0.25	J	0.46	J	0.21	J	ND		ND		discontinued		ND		ND		inactive	0.17	J	0.19	J	0.30	J
12/7/11	0.27	J	0.48	J	0.19	J	not	t sam	pled		discontinued		inactive		ND		inactive	0.16	J	0.17	J	0.23	J
3/15/12	0.15	J	0.40	J	0.22	J	0.15	J	ND		discontinued		inactive		ND		inactive	ND		0.24	J	ND	
9/25/12			0.39	J	0.23	J					discontinued		inactive		ND		inactive	ND		0.24	J	ND	
1/8/13			0.35	J							discontinued		ND		ND		inactive	0.12					
3/27/13			0.34	J							discontinued		ND		ND		inactive	0.12					
6/26/13			0.31	J							discontinued						inactive	0.27					
9/18/13			ND		ND						discontinued		ND		ND		inactive	ND				ND	
12/17/13	ND		0.19	J			-				discontinued						inactive	0.23					
3/27/14			0.16	J/A			-				discontinued		ND	Α	ND	Α	inactive	0.21		ND	Α	ND	Α
6/27/14			ND				-				discontinued						inactive	ND		0.43	J	0.17	J
9/2/14	ND		0.21	J	ND		-				discontinued		ND		ND		inactive	ND		0.48	J	ND	

NA - Not Available Blue font indicates the concentration is calculated using the weighted average of the active pumping wells.

Table 2
Current Deliverable Schedule
Former Fort Ord, Marina, CA – 20 February 2015

Deliverable Title	Submittal	Review Comments Due	Status/Remarks							
	Primary Del									
Final UFP-QAPP	May 2014	Received	Submitted 29 May 2014							
Secondary Deliverables										
Draft 2014 Annual Groundwater Monitoring Report	December 2014	January 2015	Accepted as Final without Comment.							
Draft Exit Strategy Technical Memorandum	December 2014	February 2015	Submitted 26 December 2014 (revision to last paragraph on page 12 was submitted on 14 January 2015)							
Site Safety and Health Plan Update	September 2014	TBD	To be scheduled after determination of cleanup attainment monitoring sampling requirements							
UFP-QAPP 2014 Update	TBD	TBD								
	Completed Rece	nt Submittals								
Draft UFP-QAPP	March 2014	May 2014	Submitted 04 March 2014							
Final 2013 Annual and 3rd Quarter Groundwater Monitoring Report	April 2014	NA	Submitted 04 April 2014							
Final Work Plan for Well Destruction and Treatment Plant Demolition	April 2014	NA	Submitted 04 April 2014							
Draft Health & Safety Plan – OU-1 O&M/LTM	May 2014	Received	Draft accepted as Final							
Draft Well Destruction and Treatment Plant Demolition Completion Report	August 2014	September 2014	Draft accepted as Final Submitted 03 October 2014							

¹ The Semiannual Groundwater Monitoring Report is submitted as a final document but review comments are accepted. Any comments are addressed in the Annual Groundwater Monitoring Report.



Fort Ord HTW BCT Meeting 20 February 2015

Fort Ord Operable Unit 1 Groundwater Remediation, Well Destruction, and Treatment Plant Decommissioning

ATTACHMENT 2

Correction to the OU-1 UFPP-QAPP

In 2006, the Annual and Fourth Quarter Groundwater Monitoring Report Operable Unit 1 (AR# OU1-553D) recommended that duplicate samples be collected at a frequency of 5 percent or 1 duplicate for every 20 environmental samples. Supporting data for this recommendation was provided in Section 7.6 of the 2006 groundwater monitoring report and is attached for reference. The regulatory agencies approved this recommendation and duplicate samples have been collected at a frequency of 1 duplicate for every 20 environmental samples since 2007. This duplicate sampling frequency will be continued through the attainment monitoring period. The duplicate sampling frequency specified in the UFPP-QAPP (AR #OU1-606A) approved in May 2014 was incorrectly stated as 10 percent—this will be corrected in the UFPP-QAPP Update, currently in preparation.

7.6 FIELD DUPLICATE QUALITY CONTROL SAMPLES

Duplicate samples have been collected during the quarterly monitoring program at a minimum frequency of 10 percent in accordance with the Final SAP (HGL, 2004). There was excellent agreement between the 40 pairs of parent and the duplicate samples collected during 2006. The percentage differed between the two sample results for TCE by more than 10 percent in only five of the 40 sample pairs. In each of these five samples, however, both the parent and duplicate samples showed that TCE was present at less than $5.0~\mu g/L$ and the relatively lower concentrations contributed to the higher percentage difference. The maximum percentage difference in TCE results, a value of 17.3 percent, for example, was for sample results of $0.52~\mu g/L$ and $0.43~\mu g/L$ (both estimated values were below the analytical reporting limit).

The difference between TCE results in absolute terms was greater than 0.3 $\mu g/L$ in only seven cases, with a maximum difference of 2.0 $\mu g/L$.

PZ-OUI-49-Al-94	Fourth quarter	$20 \mu g/L vs. 22 \mu g/L$
MW-OUI-88-A.:.122	Fourth quarter	$14 \mu g/L \text{ vs. } 15 \mu g/L$
MW-OUI-57-A-91	Third quarter	$11 \mu\text{g/L} \text{ vs. } 12 \mu\text{g/L}$
PZ-OU1-49-A1-94	Third quarter	$16 \mu g/L \text{ vs. } 17 \mu g/L$
MW-OUI-46-AD-121	Third quarter	$25 \mu g/L \text{ vs. } 24 \mu g/L$
MW-OUI-04-A-105	Second quarter	$4.8\mu g/L \ vs. \ 4.0\mu g/L$
MW-OUI-26-A-93	First quarter	$13 \mu g/L \text{ vs. } 12 \mu g/L$

The only other VOCs detected in the 40 duplicate pairs were cis-1,2-DCE, MEK, and chloroform. These compounds were detected far-less frequently than TCE but showed even closer agreement. The maximum difference between the parent and duplicate samples was 0.1 μ g/L for cis-1,2-DCE; 0.5 μ g/L for MEK and 0.05 μ g/L for chloroform.

There has been excellent agreement between the parent and field duplicate samples throughout the LTM program. Results from the 2005 field duplicate program, for example, were very similar to those for 2006 with all 25 field duplicates showing differences less .than 13 percent with only one pair showing concentration value difference between parent and duplicate analyses greater than 2.0 μ g/L. Results for sample MW-OUI-46-AD-121 in the second quarter revealed 39 μ g/L in the parent versus 34 μ g/L in the duplicate.

The consistent close agreement between field duplicate results has continually demonstrated the accuracy of the sample collection methods and field procedures. Within the FONR, the VOC plume boundary is well-defined by historic data and the well network. The need for frequent field duplicates as a quality control check is therefore diminished. Consequently, HGL recommends that the frequency for collecting field duplicate sample be modified to collect a minimum of one field duplicate per twenty environmental samples, a percentage of 5 percent in comparison to the previous 10 percent.