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

Groundwater Remediation, Well Destruction, and Treatment Plant Decommissioning Marina, California 13 June 2016

OU-1 On-Post Activities for 10 May through 09 June 2016

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

Attendees: (to be revised after meeting)

Individual	Attended?	Individual	Attended?	
James Specht, USACE		Kimberly Gettman, DTSC		
Teresa Rodgers, USACE		Edward Walker, DTSC		
Alex Kan, USACE		Noel Shrum, DTSC		
Bonnie McNeill, USACE		Grant Himebaugh, RWQCB		
Cory Koger, USACE		Jeff Fenton, AMEC		
Jonathan Whipple, USACE		Derek Lieberman, Ahtna		
David Eisen, USACE		Eric Schmidt, Ahtna		
William Collins, BRAC		Holly Dillon, Ahtna		
Tom Ghigliotto, Chenega ¹		Brad Clarke, Ahtna		
Melissa Broadston, Chenega ¹		Thor Anderson, Burleson		
Bart Kowalski, Chenega ¹		Steve Crane, Kemron		
Cary Stiebel, Chenega ¹		Erin Caruso, Gilbane		
Judy Huang, EPA		Larry Friend, Gilbane		
Maeve Clancy, EPA		Kevin Siemann, Gilbane		
Martin Hausladen, EPA		Monique Perry, Gilbane		
Kimberly Gettman, DTSC		Roy Evans, HGL		
Min Wu, Ph.D., DTSC		Kevin Wierengo, HGL		
Steve Sterling, DTSC		Gage Dayton, Ph.D., UCSC		
X = attended in person or by telephone; blank indicates absent from the meeting				

Notes:

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

Remediation is complete. The northwest treatment system (NWTS) is offline but operable.

Reporting/Federal Facility Agreement (FFA) Schedule

The status of ongoing and anticipated reports for OU-1 is summarized in Table 1. HGL is preparing the preliminary draft Closeout Report for Army and BRAC Office review only. The draft 2016 Annual Groundwater Monitoring Report is being prepared for submittal and may be approximately one week early (it is due on 24 June). A draft OU-1 Closure Plan as requested by DTSC (see following section) is included as Appendix D of the 2016 Annual Groundwater Monitoring Report.

OU-1 Closeout Steps and Documentation

The following action sequence was presented to the regulatory agencies at the last Base Closure Team meeting and refined through subsequent communication with DTSC.

1. Submit a Draft Closure Plan for DTSC and RWQCB review (courtesy copy to EPA); the *Draft Operable Unit 1 (OU - 1)*Closure Plan for Groundwater Monitoring Wells and Groundwater Treatment Plant, Former Fort Ord, California will describe:

BACKGROUND

- (1) OU1 Site History with Location Maps of Groundwater Monitoring Wells and Treatment Plant
- (2) OU1 Groundwater Monitoring and Northwest Treatment System (NWTS)
- (3) Met Goals of the ROD (July 1995) and ESD (June 2010)

METHODS AND PROCEDURES

- (1) The wells to be destroyed
- (2) Decommissioning and disposition of the NWTS and infiltration galleries/trenches
- (3) Disposition of OU-1 infrastructure (pipelines and power)

SITE RESTORATION HEALTH AND SAFTY PLAN ENVIRONMENTAL MONITORING

PROJECT TEAM PROPOSED SCEDULE

- 2. Respond to comments and submit a Final Closure Plan to DTSC and RWQCB
- 3. Perform the work items identified in the approved Closure Plan
- 4. Consider removing any institutional controls (deed restrictions, land use covenants, etc.)
- 5. Submit draft and final versions of the Site Closure Report to DTSC and RWQCB describing the work activities performed in accordance with the Closure Plan
- 6. Obtain DTSC and RWQCB approval of the Site Closure Report
- 7. Await completion of other OUs at former Fort Ord
- 8. Submit OU-1 Site Closure Report in conjunction with Closeout Reports for all other OUs
- 9. Obtain EPA and State concurrence that all former Fort Ord OUs are complete

The BRAC Office, the Army, and EPA will continue to consider the possibility of a partial delisting from the Fort Ord Superfund site for OU-1.

Revised Preliminary Health Advisory (PHA)

The EPA established a new Preliminary Health Advisory value for perfluorooctanoic acid (PFOA) – it has decreased from 400 nannograms per liter (ng/L) of PFOA to 70 ng/L for the sum of PFOA and perfluorooctane sulfonate (PFOS) concentrations. All OU-1 wells sampled during the attainment monitoring period met the old PHA value. However, two wells do not meet the revised value (Figure 10 from the Remedial Action Completion Report is attached for reference):

• MW-OU1-88-A showed PFOA concentrations between 180 ng/L and 270 ng/L in all four attainment events. PFOS ranged from 33 ng/L to 72 ng/L.

• The initial sample from PZ-OU1-10-A1 showed PFOA at 120 ng/L and PFOS was not detected. This well was not sampled thereafter because the sample collection method leads to a significant amount of suspended sediment in the HydrasleeveTM sampling device. The sediment is believed to result from damage to the casing and/or well screen.

The Army will conduct well abandonment in phases beginning with the off-Post Armstrong Ranch wells. Those OU-1 wells located within the FONR, including MW-OU1-88-A and PZ-OU1-10-A1, will be abandoned in 2017 or later. This schedule will allow time to consider the revised PHA values and address any questions that may arise.

OU-1 Rare Plant Monitoring

Preparation began for the draft OU-1 2016 rare plant survey report. No piperia were observed during the 2016 survey.

New/Current Action Items:

- DTSC confirmed the closeout activities and reporting needed (as outlined above) to complete the OU-1 closure effort.
- The well demolition plan will be added to the deliverable schedule after funding is obtained and contracting is completed.

Ongoing:

- Submit draft minutes for previous BCT meeting(s)—complete through May 2016.
- Submit final minutes for previous BCT meeting(s)—complete through May 2016.

Table 1 Current OU-1 Deliverable Schedule Former Fort Ord, Marina, CA –June 2016

Deliverable Title	Submittal	Review Comments Due	Status/Remarks		
Primary Deliverables					
Final PFOA/PFOS Sampling Results Technical Memorandum Attainment Monitoring Events 1 - 4	04 March 2016	01 April 2016	Final submitted 16 March 2016		
Secondary Deliverables					
2016 OU-1 Groundwater Monitoring Report	24 June 2016	25 July 2016	In preparation (potential early submittal).		
Completed Recent Submittals					
Final Exit Strategy Technical Memorandum	March 2015	April 2015	Draft Final approved without comment. Change pages distributed 12 May 2015		
Site Safety and Health Plan Update	March 2015	Not Applicable	Army approved revisions		
Final UFP-QAPP Revision 1	March 2015	April 2015	Draft Final approved without comment. Change pages distributed 14 May 2015		
2015 Semiannual Groundwater Monitoring Report ¹	07 August 2015	10 September 2015	Accepted without comment		
Draft 2015 Annual Groundwater Monitoring Report ¹	15 October 2015	16 November 2015	Draft Accepted without comment; final submitted 03 December 2015		
Final UFP-QAPP Revision 2	14 October 2015	16 November 2015			
Draft PFOA/PFOS Sampling Results Technical Memorandum Attainment Monitoring Events 1 - 4	29 January 2016	29 February 2016	Comments received and addressed		

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.