



**Final
Hazardous and Toxic Waste (HTW) Base Realignment
and Closure (BRAC) Cleanup Team (BCT)**

Meeting Minutes

July 12, 2019

BRAC Conference Room
Former Fort Ord, California



Agenda

Reference the handout titled "HTW BRAC Cleanup Team Meeting Agenda, Friday, July 12, 2019 at 1:30 PM, Former Fort Ord, California."

1. Attendance

Last Name	First Name	Organization	By Phone
Anderson	Thor	Burleson Consulting	
Broadston	Melissa	Chenega supporting BRAC	
Caruso	Erin	Gilbane	X
Clancy	Maeve	U.S. Environmental Protection Agency (USEPA)	
Collins	Bill	U.S. Army Base Realignment and Closure (BRAC), Fort Ord Office	
Crane	Steve	KEMRON Environmental Services (KEMRON)	
Dillon	Holly	Ahtna Environmental, Inc. (Ahtna)	
Floyd	Bridget	U.S. Army Corps of Engineers (USACE)	
Gentry	Dana	USACE	
Gettmann	Kimberly	California Department of Toxic Substances Control (DTSC)	X
Ghigliotto	Tom	Chenega supporting BRAC	
Ginorio-Dean	Amber	USACE	X
Kowalski	Bart	Chenega supporting BRAC	
Lieberman	Derek	Ahtna	
Savage	Tom	USACE	X
Sellinger	Amber	California Regional Water Quality Control Board, Central Coast Region (CCRWQCB)	X
Soderberg	Sheila	CCRWQCB	X
Sterling	Steve	DTSC	X
Stiebel	Cary	Chenega supporting BRAC	
Whipple	Jonathan	USACE	X
Wu	Min	DTSC	

2. BCT Minutes Status

Hazardous and Toxic Waste (HTW) Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting minutes are final through March, and April minutes will be sent out next week.

3. Community Outreach Update

The handout titled "U.S. Army Community Outreach Update" was reviewed. Additional discussion included:

- The Annual Report is in internal review and is scheduled to be sent to the BCT for review before the August HTW BCT Meeting. The Annual Report is sent out to approximately 65,000 addresses.
- The Community Involvement Mobile Workshop (CIW) is tomorrow July 13 and focuses on munitions, prescribed burn program, and habitat restoration. The bus route is the same route as last year.
- A new safety message is being advertised for Fort Ord advising people to not use metal detectors.
- Responses to comments submitted by the Fort Ord Community Advisory Group are in progress.
- The draft community outreach calendar for 2020 was provided. The BCT concurred with the schedule.

4. Operable Unit 2 (OU2)

a. Groundwater Remedy/Monitoring–

The handout titled "Former Fort Ord Operable Unit 2 Data and Status" was reviewed. Additional discussion included:

- The OU2 groundwater treatment plant (GWTP) was online 100 percent of the time in June.
- The OU2 injection point of compliance analytical results for June were not detected for all chemicals of concern (COCs) except for 1,1-dichloroethane with an estimated detection below the discharge limit.
- The Second Quarter 2019 groundwater monitoring event was completed.
- On June 5 a leak in the vault for extraction well EW-OU2-12-A was repaired and the well was restarted on June 18.
- The Western Network remains offline.
- Preliminary analytical results for the Second Quarter groundwater monitoring event were presented.
 - Results were mostly similar to the First Quarter 2019 event for the OU2 A-Aquifer and Upper 180-Foot Aquifer.
 - MW-OU2-44-A had a large decrease in concentrations for all COCs, with tetrachloroethene (PCE) and 1,1-dichloroethane (1,1-DCA) decreasing below their aquifer cleanup levels (ACLs). This well is located between two of the new A-Aquifer extraction wells, EW-OU2-18-A and EW-OU2-19-A, and this could be why there was a decrease in COC concentrations, but the well will continue to be monitored.
 - PCE concentration at MW-OU2-27-A decreased to below the ACL.
 - MW-OU2-06-AR had an increase in COC concentrations, though they are still below the ACLs.
 - MW-OU2-08-A had an increase in PCE concentration, which may suggest migration of PCE downgradient.
- The OU2 Fourth Quarter 2017 through Third Quarter 2018 annual report includes Appendix F, which is an update to the Human Health Risk Assessment (HHRA) to support the recommendation to increase the PCE ACL from 3.0 micrograms per liter (µg/L) to 5.0 µg/L to match the State and Federal maximum contaminant level (MCL) and the Sites 2/12 and OUCTP A-Aquifer ACLs.
 - Comments were due on the OU2 Annual Report on July 5. The CCRWQCB accepted the

document as written, DTSC will have comments which will be sent late (likely next week), and USEPA stated they could comment on the Annual Report if more time is given.

- An Explanation of Significant Differences (ESD) would be prepared to document the change in the PCE ACL with the basis for the change already presented in Appendix F of the OU2 Annual Report.
- Maeve Clancy with the USEPA noted that the updated HHRA has a higher risk of 1×10^{-4} than the baseline risk in the OU2 Record of Decision (ROD) of 6×10^{-5} . The increased risk mainly is due to the stricter current toxicity values used for COCs than the baseline risk assessment completed in 1994. The updated OU2 HHRA is also near the upper limits of the risk range.
- Maeve will discuss with John Chestnut of the USEPA and determine what they will do since they do not have many available toxicologists and if they would have to subcontract it out. John Chestnut did look at the Sites 2/12 ESD that documented the increase of the PCE ACL and supports that route. However, there was no update to the HHRA at Sites 2/12, so it is uncertain if risk increased or not at Sites 2/12, though there has been more remediation progress at Sites 2/12 compared to OU2.
- The updated OU2 HHRA has a scenario that looks at the risk with PCE at $5.0 \mu\text{g/L}$, COCs that are currently above ACLs set at their ACL, and COCs that are currently below ACLs set at their 95% upper confidence limit.

b. Treated Water Reuse – No treated water was used recently. No treated water will be used at the new OU2 GWTP until after the Government accepts the GWTP from the JV. When the Army accepts the GWTP, they will work with Burlison to receive treated water. There is a temporary fitting available to collect treated water. A permanent fitting with a flow meter will be installed at a later time to track treated water usage. Treated water would also be used for erosion control at the Landfills.

c. Groundwater Treatment Plant Relocation – Construction of the new OU2 GWTP is in progress. The following items were discussed:

- The Pre-Final inspection was conducted this week and a punch list of items will be completed soon.
- The western network still needs to be brought online.

d. Landfills Operations and Maintenance (O&M) – The handout titled “Former Fort Ord Operable Unit 2 Landfills Data and Status” was reviewed. Additional discussion included:

- Mowing of the vegetative cover was completed.
- Standard thermal treatment unit (TTU) operations are being done.
- Maintenance and repair was completed at the TTU.
- Landfill erosion repairs will begin this month, including repairing Area F, leveling the landfill gas extraction pipeline, and repairing perimeter roads. Work will begin July 22.
- The Landfills annual reporting period will change this year from a calendar year to a fiscal year and the annual Landfills report will be combined with the annual groundwater monitoring report to create a single annual report for OU2.
- The TTU methane influent has an overall declining trend, with a little more fluctuation recently.
- The quarterly Monterey County Health Department inspection was conducted and there were no issues.

5. Sites 2 and 12 (Sites 2/12)

The handout titled "Former Fort Ord Sites 2 and 12 Data and Status" was reviewed. Additional discussion included:

- The Sites 2/12 GWTP was online almost 100 percent of the time in June.
- The Sites 2/12 soil vapor treatment unit (SVTU) remains offline. At the last HTW BCT meeting it was recommended based on data from the rebound study to not turn the SVTU back online. The CCRWQCB and the USEPA concurred at the last BCT meeting. The DTSC asked for a follow-up email, which was sent on July 1 and DTSC has not responded yet. Min Wu with DTSC confirmed that DTSC concurs with leaving the SVTU offline and a follow-up e-mail is not required. Each quarter the soil gas data will be evaluated to determine if the SVTU should remain offline or be restarted.
- No sample was required in June for the Sites 2/12 GWTP injection point of compliance because the granular activated carbon was changed out on June 4.
- The Second Quarter 2019 groundwater monitoring event was completed. Preliminary data was presented. PCE concentrations at MW-12-20-180U declined below the ACL and decreased slightly at EW-12-08-180U. The PCE plume at Sites 2/12 will get a little smaller. PCE concentrations cycle at MW-12-20-180U, and are currently in a downward trend. PCE concentrations cycle at EW-12-08-180U between 10 µg/L and 20 µg/L; however, there is no discernable trend.

6. Operable Unit Carbon Tetrachloride Plume (OUCTP)

a. Groundwater Remedy/Monitoring–

The handout titled "Former Fort Ord Operable Unit Carbon Tetrachloride Plume Data and Status" was reviewed. Additional discussion included:

- An Optimization Meeting was held on June 18 and remedy modifications were discussed due to carbon tetrachloride (CT) observed in the new A-Aquifer monitoring wells.
- The Second Quarter 2019 groundwater monitoring event was completed.
- The Follow-Up Biological Survey Report is scheduled to be issued as Preliminary Draft this month.
- Preliminary Second Quarter 2019 data was presented.
 - At A-Aquifer monitoring well MW-BW-31-A, the CT concentration increased from not detected to 1.5 µg/L. This well is located mid-plume on the boundary of the plume. This concentration is the historical maximum for this location, and may be indicative of upgradient concentrations.
 - In the downgradient area, CT increased above the ACL from 0.11 µg/L to 1.4 µg/L at A-Aquifer monitoring well MW-BW-74-A, though CT concentrations at a few other wells in the downgradient area decreased below the ACL, so it is a net positive result.
 - At Upper 180-Footer Aquifer monitoring well MP-BW-46-170, the CT concentration decreased to the within the normal historical range after the increase in the First Quarter 2019 event.
 - New well MW-BW-57-180 in the Upper 180-Footer Aquifer had an increase in CT concentration from 0.30 µg/L to 0.66 µg/L, which is above the ACL.
 - In the Lower 180-Footer Aquifer, the CT concentration at MP-BW-50-339 increased above the ACL, but this will not change the shape of the plume much.
 - The TCE concentration in the new Lower 180-Footer Aquifer monitoring well MW-BW-59-180 increased from 8.9 µg/L to 11.3 µg/L.
 - Per the CCRWQCB request, 400-Footer Aquifer monitoring well MW-OU2-28-400 (located adjacent to MW-BW-59-180) was profiled in the Second Quarter 2019. CT and TCE were

not detected in any of the profile samples, confirming that contamination is not migrating to the deeper aquifer. It was not expected to find anything in this well since the Basewide Remedial Investigation Feasibility Study (RI/FS) did not find a connection between the Lower 180-Foot Aquifer and the 400-Foot Aquifer. The CCRWQCB is ok with leaving MW-OU2-28-400 off the Quality Assurance Project Plan sample schedule, but may request another sample to confirm the data again sometime in the future.

b. TCE in the Lower 180-Foot Aquifer–

The handout titled “Former Fort Ord Lower 180-Foot Aquifer” was reviewed. Additional discussion included:

- As requested by the CCRWQCB, TCE concentrations at select wells from OU2 and OUCTP in the A-Aquifer, Upper 180-Foot Aquifer, Lower 180-Foot Aquifer, and 400-Foot Aquifer were presented for the Second Quarter 2019 groundwater monitoring event in a table and a map to be used for discussion about possible migration of TCE to the Lower 180-Foot Aquifer.
- New Lower 180-Foot Aquifer monitoring well MW-BW-59-180 has had an increasing TCE trend since sampling began in the Fourth Quarter 2018.

7. Basewide Range Assessment (BRA) and Lead Evaluation Status

The handout titled “BRA and Lead Evaluation Status” was reviewed. Additional discussion included:

a. Basewide Range Assessment (BRA) –

- Responses to DTSC’s comments were submitted for review last month. Most of the comments are related to Unit 33 and how remediation areas were determined. There needs to be a conversation with DTSC to determine if everyone is on the same page.
- Comments are being addressed on the Comprehensive BRA Report and it is close to being submitted. This document will be a large reference report.
- The Draft report for the site walk in BLM Area B reconnaissance areas is in progress and is scheduled to be issued next week.

b. Lead Evaluation at HA 18D and HA 23D –

The cleanup value is still being discussed between the DTSC and the Office of Environmental Health Hazard Assessment. Kim Gettmann with DTSC will keep Alex Kan updated on the status of discussions. In the meantime, the Army will go forward with surveying the area of concern. There is no update from DTSC. An ESD will be prepared. Still on hold pending DTSC meeting which is expected to occur at the end of July. Survey of HA 18D and 23D started this week and this information will be used in the legal description in the deed until the cleanup is completed.

c. Erosion Control –

Erosion control maintenance work will be completed before the next rainy season. Work is in progress at HA 27A, 34, and 37.

d. Landfills Soil Management –

Range 48 munitions response site is being monitored to determine any need to put debris into the OU2 Landfills, including target metal debris, in the coming months, though nothing is expected immediately.

e. Habitat Restoration – The handout titled “Site 39 Inland Ranges Habitat Restoration Status Update” was reviewed. Additional discussion included:

- Continued seed collections for a couple species. All wet weights look good and it is expected dry weight targets will be met.
- Monitoring is still in progress, including vegetative cover transects and species richness surveys. The vegetative cover survey is 50 percent completed.
- The irrigation project at HA 26 is still getting water from Marina Coast Water District. The second irrigation event was completed on June 18, and the third event completed July 9 to 10. Each event uses 6,000 gallons of water. Wildlife, such as coyotes, is chewing and damaging the irrigation lines, which were repaired. There was also a low pressure issue, which was remedied with installation of extra valves. Plant growth in the irrigated area looks good.
- A few plants were tested for pathogens with pear baiting and all results were negative.
- Continuing propagation of approximately 4,000 plants and expected to reach targets.

8. FFA Schedule

Status Update – The Federal Facility Agreement (FFA) schedule is provided to the agencies with the upcoming primary documents with the month the Draft and Draft Final versions will be issued. Draft versions have a 60-day review period and Draft Final versions have a 30-day review period. There are no primary documents currently.

Document Schedule – The handout titled “12 July 2019 BCT Deliverable Schedule” was reviewed and near-term documents were identified. The perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) report is scheduled to be issued this month. Maeve Clancy with the USEPA stated she will need extra time to review the PFOA/PFOS report to be able to share it with headquarters and requests a 45 to 60 day review period instead of 30 days.

9. Action Items

The handout titled “HTW BCT 2019 Action Items” was reviewed. The National Priorities List (NPL) partial deletion was discussed internally.

10. Calendar Update

The calendar was reviewed for upcoming HTW BCT meeting dates. The CIW is tomorrow July 13 and the TRC is July 16. There is an audit on July 29. The next HTW BCT meeting is August 21 at 1:30pm. The September HTW BCT meeting is tentatively scheduled for September 11 at 1:30pm. The October HTW BCT meeting is tentatively scheduled for October 9 at 1:30pm. The November HTW BCT meeting is tentatively scheduled for November 13 at 1:30pm.