



**Final
HTW BCT
Meeting Minutes
May 13, 2022**



BRAC Conference Room
Former Fort Ord, California
And Teleconference Meeting

Agenda

Reference the handout titled “HTW BRAC Cleanup Team Meeting Agenda, Friday, May 13, 2022, at 1:30 PM, Former Fort Ord, California.”

1. Attendance and Announcements

Last Name	First Name	Organization	By Phone
Bayliff	Kyle	USACE	
Bleichner	Randall	California Department of Toxic Substances Control (DTSC)	x
Booze	Thomas	DTSC	x
Cervantes	Christina	Chenega for BRAC	
Chain-Britton	Cindy	DTSC	
Clancy	Maeve	U.S. Environmental Protection Agency (USEPA)	
Collins	Bill	U.S. Army BRAC, Fort Ord Office	
Dillon	Holly	Ahtna Global, LLC (Ahtna)	x
Floyd	Bridget	U.S. Army Corps of Engineers (USACE)	
Hession	Shaelyn	Ahtna	x
Higgins	Jolie	USACE	
Kochman	Aaron	Chenega for BRAC	
Kosowski	Sylvester	Ahtna	x
Kowalski	Bart	Chenega for BRAC	
Leary	Brett	DTSC	
Lieberman	Derek	Ahtna	
Meakes	Charity	USACE	x
Nozaki	Chieko	Chenega for BRAC	
Sarmiento	Riz	DTSC	x
Schmidt	Eric	Ahtna	
Sellinger	Amber	California Regional Water Quality Control Board, Central Coast Region (CCRWQCB)	
Spellenberg	Rachel	Burleson Consulting	x
Stiebel	Cary	Chenega for BRAC	
Walak	Kelsey	USACE	

2. BCT Minutes Status

HTW BCT meeting minutes are final through the last meeting in February 2022.

3. Community Outreach Update

The handout titled “U.S. Army Fort Ord Environmental Cleanup Community Outreach Update” was reviewed. Additional discussion included:

- The Fort Ord Annual Report's target publication date for the draft is in June.
- Analysis of the 2021 Community Survey is in progress.
- The Community Involvement Workshop was held online with pre-recorded presentations and began on February 11. They will be available through May but are no longer located on the first page.
- The Guided Nature Walk is scheduled for tomorrow, May 14. Notices about the Guided Nature Walk sign-ups were sent to approximately 1,500 mailing addresses and 2,000 email addresses. The maximum capacity of 120 people was reached within a few days of announcement.
- The Fort Ord environmental cleanup information booth was held at the Seaside Earth Day event on April 30, which was well attended. Fort Ord environmental cleanup is providing an information table at the Defense Language Institute (DLI) Language Day event on May 13 (today).
- The July Community Involvement Workshop will be held on July 23. There will be an open house. The Technical Review Committee will be held on July 26 highlighting the munitions cleanup and Environmental Services Cooperative Agreement.
- Responses to community comments received on cleanup documents are in progress.
- The Associated Press (AP) article came out on February 23 about Fort Ord based on previous interviews and site visit held in 2021. The Agency for Toxic Substances and Disease Registry (ATSDR) is evaluating whether another health assessment should be conducted and requested Fort Ord data. A meeting is scheduled next week. The ATSDR mentioned they were interested in drinking water data and vapor intrusion information.

4. 5th Five-Year Review

There was no handout for the 5th Five-Year Review. Discussion included:

- The draft document for regulatory agency review was issued in late March, and comments are requested by the end of May.
- USEPA has received comments back from headquarters.
- RWQCB and DTSC are still reviewing the report.

5. Operable Unit 2 (OU2)

a. Groundwater Remedy/Monitoring –

The handout titled “Operable Unit 2 Data and Status” was reviewed. Additional discussion included:

- Table 1 shows that the OU2 groundwater treatment plant (GWTP) was online 100 percent (%) of the time from February through April, treating cumulatively nine billion gallons of water and over 930 pounds of chemicals of concern (COCs), approaching an average flow rate of 1,000 gallons per minute (gpm).
- Table 2 shows the OU2 GWTP injection point of compliance sampled from February through April. A few COCs were detected at concentration levels below their discharge limits.
- Key events were discussed for February through April and upcoming events.
 - On February 8, extraction well EW-OU2-08-180 was turned on and began continuous operation. A variable frequency drive (VFD) will be installed but is back-ordered for 30 weeks. A salvaged VFD may be used instead.
 - The failed pressure transducer at EW-OU2-16-A was replaced on May 10. The well will be redeveloped on May 23.

- A granular activated carbon (GAC) change-out for the primary vessels will be scheduled for June.
- Data from the First Quarter 2022 groundwater monitoring event was shared and discussed.
 - A few highlighted wells in the tables and figures are green for decreasing concentrations, red for increasing concentrations, and yellow to note consistent concentrations.
 - The A-Aquifer COC concentrations had minor changes when comparing the First Quarter 2022 and the Fourth Quarter 2021 results.
 - EW-OU2-16-A increased concentrations, with the COC 1,1-dichloroethane (1,1-DCA) above the aquifer cleanup level (ACL).
 - A few wells (EW-OU2-19-A, EW-OU2-20-A, and MW-OU2-02-A) decreased concentrations for a few COCs. 1,1-DCA at EW-OU2-20-A decreased below the ACL. Tetrachloroethene (PCE) at MW-OU2-02-A decreased below the ACL.
 - MW-OU2-27-A is located in Hydraulic Zone 2 east of the groundwater divide and has had consistent PCE concentrations above the ACL. However, the PCE concentration decreased during the First Quarter event and is just above the ACL.
 - Concentrations at MW-OU2-06-AR decreased, with PCE and trichloroethene (TCE) going below the ACLs. The trend chart for this well shows a similar pattern as historical data with a decrease in concentrations during the first quarter events.
 - A few wells (MW-OU2-07-A, MW-OU2-08-A, and MW-OU2-75-A) in the area north and east of the eastern extraction well network have had consistent COC concentrations above their ACLs. Trend charts for these wells were similar, showing a slight decrease in COC concentrations during the First Quarter event.
 - A map of the A-Aquifer COC plumes was shared.
 - The Upper 180-Foot Aquifer First Quarter results were similar to previous events, with some TCE concentrations decreasing.
 - MW-OU2-28-180 had a decrease in TCE concentration below the ACL, which is the typical seasonal trend, as shown in the trend chart.
 - MW-OU2-62-180 has decreased TCE concentrations and has been below two micrograms per liter ($\mu\text{g/L}$) over the past few sampling events. The trend chart shows that the first quarter events typically have increased concentrations historically but decreasing this time. There has been an overall decline in TCE concentrations since 2019.
 - EW-OU2-01-180 has had increasing TCE concentrations over the past few events.
 - A map of the A-Aquifer COC plumes was shared. The TCE plume in Hydraulic Zone 8 was removed for the First Quarter event because TCE decreased below the ACL at MW-OU2-28-180.

b. Treated Water Reuse – The handout titled “Operable Unit 2 Treated Water Reuse” was reviewed. Additional discussion included:

- In March, 1,350 gallons of treated water were used at the OU2 Landfills.
- In April, no treated water was used.
- The total treated water used since October 2016 is 4,344,750 gallons.

- Shea Homes and their subcontractor Teichert submitted a work plan to use treated water from southwest injection. The Army will approve the work plan once California State University Monterey Bay (CSUMB) grants a right-of-entry permit.

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

- The handout has a picture of a coyote spotted in Area E of the OU2 Landfills. There may be a mating pair of coyotes onsite, which is helpful with rodent control.
- In June, annual landfill gas monitoring and thermal treatment unit (TTU) source testing will be conducted.
- The Quarterly County inspection will be scheduled.
- Annual mowing will be conducted in the third quarter in August or September.
- Since 2006, the TTU has removed approximately four million pounds of methane.
- The TTU had an anomalous low methane concentration of 31% which was inconsistent with the extraction point methane concentrations. Now it is back up to 35.5%. Overall, the methane trend is decreasing.

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

The handout titled “Sites 2 and 12 Data and Status” was reviewed. Additional discussion included:

- Table 1 shows that the Sites 2/12 GWTP was online 100% of the time in February and March at approximately 140 gpm. The Sites 2/12 GWTP was online 72% of the time in April at 102 gpm because it was shut down on April 22.
- The soil vapor treatment unit (SVTU) remains offline.
- Table 2 shows the Site 2 injection point of compliance was sampled in February, March, and April, with COCs detected at concentrations below their discharge limits.
- Key events were discussed for February, March, April, and upcoming events.
 - The GWTP at Sites 2/12 was shut down on April 22 per Quality Assurance Project Plan (QAPP) decision rules after all groundwater COCs were below the ACLs for two consecutive quarters. The extraction wells EW-12-05-180M and EW-12-08-180U will continue to be sampled monthly.
 - If concentrations remain below ACLs, the Third Quarter 2022 event will complete the remediation monitoring phase. At that time, the completion of the attainment monitoring phase can be confirmed. The monitoring programs can be discontinued by the Fourth Quarter 2022 event, and site closure can be proposed.
 - The property developer Shea Homes is interested in decommissioning EW-12-04-180U, EW-12-04-180M, and MW-12-05-180 due to the planned development of a Monterey Motor Sports facility. They are also interested in decommissioning SG-12-18 for planned development for The Brass Tap. No date has been set for the work.
- The First Quarter 2022 groundwater results were discussed.
 - TCE groundwater concentrations for the First Quarter 2022 were still below the ACL.
 - PCE groundwater concentrations for the First Quarter 2022 were still below the ACL.
 - The First Quarter 2022 groundwater monitoring results map was shared.
 - The trend chart for EW-12-08-180U shows PCE is below ACLs, including just before the GWTP was shut down.
- The First Quarter 2022 soil gas data was presented.

- PCE concentrations are below the soil gas cleanup level (SGCL). There was one detection above the soil gas screening level (SG-SL), but that is not a measure for groundwater protection. The probe is SG-12-02-10, which is a shallow probe adjacent to Target. Data indicates a declining PCE trend. The trend chart for this location shows a seasonal cycle.
 - TCE concentrations are still above the SGCL at SG-12-04. However, there is an indication that the concentrations are either stabilizing or decreasing.
 - The First Quarter 2022 soil gas concentration map was shared.
 - SG-12-04 probe cluster PCE trend chart shows a minor increase in concentrations after the SVTU was shut down but below the SGCL.
 - SG-12-06 probe cluster is south of SG-12-04. The PCE trend has been below the SGCL for a while, including after the SVTU was shut down.
- Comments were received on the Sites 2/12 Exit Strategy requesting more indoor air sampling, but indoor air sampling was already completed, and additional sampling is not warranted. There was no risk identified to the indoor air pathway prior to soil vapor extraction and treatment. Two sampling events occurred, one in the fall as part of the Remedial Investigation/Feasibility Study (RI/FS) and one in the spring to confirm the results of the RI/FS.
 - Amber Sellinger from the RWQCB requested additional information on whether or not a second round of indoor air sampling was conducted during the initial indoor air investigation. It was confirmed that two sampling events had occurred.
- Comments from the RWQCB and the DTSC requested additional sampling at a few soil gas probes (SG-12-07-65, SG-12-17-60, and SG-12-20-70) to evaluate them for a potential rebound.
 - These probes were sampled as part of the soil gas rebound study and were previously removed from the soil gas monitoring program (SGMP) per the Soil Gas QAPP decision rules and low COC concentrations. For statistical analysis, it would be necessary to have at least eight data points, which would be two more years of monitoring.
 - Trend charts from these probes show that COC concentrations have been below SG-SLs since at least 2016, and there is no indication that concentrations will rebound above SGCLs. These trend charts were also available in the Soil Gas Rebound Study Technical Memorandum.
 - Maeve Clancy, with the USEPA, stated that it would be hard to make a decision to shut down the remedy permanently with the information currently available.
 - The QAPP decision criteria for removing probes from the SGMP are very conservative. Once the probe is removed, attainment monitoring is complete, unless there is compelling evidence to put it back into the SGMP.
 - The Army agreed with the regulatory agencies to sample the three probes (SG-12-07-65, SG-12-17-60, and SG-12-20-70) once during the Second Quarter 2022 SGMP event to confirm that rebound is not occurring. However, these probes would not be added to the monitoring program.
- The Sites 2/12 groundwater remedy shut down was discussed.
 - The normal conservative GWMP QAPP decision criteria for an extraction well or monitoring well is to reduce monitoring from quarterly to annual after four consecutive quarters of all COCs below either 10% of their ACL or the limit of quantitation (LOQ). Then after two consecutive annual events meeting the same criteria, the well is removed from the GWMP.
 - However, during remedy completion, the site closure decision criteria supersede the GWMP decision criteria. Following through with GWMP decision criteria when the remedial action objectives (RAO) have already been met would add at least several more years of monitoring.

- Extraction well operational QAPP decision rules state that, if there are two consecutive quarters of all COCs below their ACLs, then the extraction well can be shut down. The site moves to closure if all extraction wells are shut down on the site. Two additional quarters of monitoring are conducted to confirm the remediation monitoring phase is completed, and the site's closure can then be recommended.

7. Operable Unit Carbon Tetrachloride Plume (OUCTP)

a. Groundwater Remedy/Monitoring – The handout titled “Operable Unit Carbon Tetrachloride Plume Data and Status” was reviewed. Additional discussion included:

- The First Quarter 2022 groundwater data was discussed.
 - One well had a passive diffusion bag (PDB) sampler fall off the rope during the event. A new PDB was installed, and the well was sampled later in the quarter.
 - A few wells were sampled during the initial event with anomalous results compared to historical data. It was suspected that the sample labels were switched between the wells. The three wells were resampled later in the quarter, and the new results were comparable to historical data. The resample results will be reported in the quarterly report.
 - Groundwater data was similar to previous events. Maps of the results were also presented.
- A-Aquifer results:
 - MW-BW-91-A, located in the most recent Enhanced In Situ Bioremediation (EISB) Deployment Area 3A, had a decreasing carbon tetrachloride (CT) concentration trend to below the ACL in the First Quarter event. The trend chart for this well shows the CT concentration has decreased since 2018.
 - MW-BW-26-A had a declining concentration trend. The trend chart for this well shows a decrease in concentrations since 2018. Three adjacent wells have concentrations that are stable or declining.
 - In Hydraulic Zone 4, there is an increasing CT concentration trend at MW-BW-32-A. This is likely one of the “eggs in the snake” migrating downgradient from EISB Deployment Area 2B. The trend chart for this well shows a previous “bubble” of CT mass that increased in 2014 and dropped in concentration quickly in 2015.
- Upper 180-Foot Aquifer results:
 - MP-BW-46-170 had a spike in CT concentrations in 2019 and has recently had a stable CT concentration with a seasonal cycle. This well represents the northern extent of the CT plume with persistent concentrations above the ACL. This well is within the capture area of the extraction well EW-OU2-09-180.
 - There was a declining CT trend at a few wells (MW-BW-52-180, MW-BW-57-180, and MW-OU2-64-180).
 - MW-OU2-64-180 has had a fluctuating CT concentration with a recent declining trend.
- Lower 180-Foot Aquifer results:
 - MP-BW-49-316 CT concentrations have consistently been above the ACL with a seasonal cycle since monitoring began in 2011.
 - MW-OU2-69-180 has had persistent CT concentrations at approximately twice the ACL but recently decreased.
- A-Aquifer Hydraulic Zone 5 shallow PDB results:

- Hydraulic Zone 5 is the most downgradient section of the OUCTP A-Aquifer and where groundwater is the shallowest. There were some increasing concentrations in this section, and shallow station PDB bags were added to have two samples per well for those with concentrations above the CT ACL. The second PDB station is at the depth with the highest CT concentration.
- The shallow sampling stations in the area are well below the CT ACL, except at MW-BW-80-A.
- MW-BW-49-A was used in the RI/FS, showing that vapor intrusion was not a risk as part of the human health risk assessment (HHRA). MW-BW-80-A concentrations are now similar to MW-BW-49-A during the RI/FS HHRA, indicating vapor intrusion is still not a risk.
- A few wells that were not being monitored due to low COC concentrations in the downgradient Hydraulic Zone 5 area were added back into the monitoring program.
- One of the recommendations for the OUCTP A-Aquifer is to install additional monitoring wells in the downgradient Hydraulic Zone 5 area. A map of the area where the wells may be located was included. Once the wells are funded, a work plan will be prepared.

b. TCE in the Lower 180-Foot Aquifer – TCE is not a COC for the Lower 180-Foot Aquifer, but it is being monitored to assess any potential impact on the downgradient drinking water supply wells.

- TCE in the Lower 180-Foot Aquifer is being addressed in the Five-Year Review.
- There is a trend concentration chart for TCE at Upper 180-Foot and Lower 180-Foot Aquifer wells upgradient and downgradient of the suspected discontinuity in the Intermediate 180-Foot Aquitard where TCE may be migrating from the Upper to the Lower 180-Foot Aquifer.
 - The First Quarter 2022 event had decreasing TCE concentrations.
 - The OU2 Upper 180-Foot Aquifer extraction wells EW-OU2-05-180 and EW-OU2-06-180 are adjacent to each other and had a period of time where only one well out of the two was operating, possibly allowing TCE to escape capture and migrate to Hydraulic Zone 8. In February 2022, previously offline OU2 Upper 180-Foot Aquifer extraction well EW-OU2-08-180 was turned on to capture a portion of the Hydraulic Zone 8 area.
 - MW-BW-59-180 has consistent TCE concentrations around 10 µg/L with decreases over the past few quarters.

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

There was no handout for the BRA and Lead Evaluation Status. Discussion included:

a. BRA –

The Comprehensive BRA Report will be issued in June and summarizes soil cleanup actions.

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

DTSC and USEPA have not yet discussed the lead cleanup value but expect to discuss it before July. USEPA indicated it would accept a lead cleanup value of 80 milligrams per kilogram (mg/kg) as recommended by DTSC. However, the Army has recommended a 200 mg/kg lead cleanup value. A couple of other California sites will also be using a lead cleanup value. However, no decisions have been made on the value. At Fort Ord, a draft Explanation of Significant Differences (ESD) can be prepared with the 200 mg/kg value to begin official communication. It is expected that HA 18D and HA 23D will not be used as residential but would still be cleaned up to a residential level because it is a residential site as identified in the Reuse Plan, and the City of Seaside would not want to limit its use. The sites were already cleaned up below 200 mg/kg. Therefore, no cleanup action would be needed if this cleanup value is accepted. The Preliminary Remediation Goal (PRG) was set at 400 mg/kg, so the Army believes

200 mg/kg is an acceptable level.

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

- The 11th Annual Habitat and Biological Monitoring Meeting was held on April 7, presenting the 2021 activities and overall restoration progress.
- The Annual Habitat Restoration Report was finalized.
- Approximately 1,600 plants are being grown at a nursery for planting later this year at six sites, including at Historic Area (HA) 34, which is the last site-specific restoration plan prescription.
- Erosion control work was completed, including production seed broadcast, collapsing minor rills, and replacing deteriorated straw wattles. Sites have been pretty stable in the past few years.
- The spring monitoring photo points were all completed.
- Sand gilia surveys were completed in April. This week surveys began for Monterey spineflower and Seaside bird’s beak.
- Species richness and native cover surveys will be completed soon.
- Photos were shared of the sand gilia survey and a manzanita cutting.

9. Federal Facility Agreement (FFA) Schedule

a. Status Update – The 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. The Fifth Five-Year Review Report is the only primary document listed on the document schedule, with the Draft issued in March 2022 and the Final report signatures needed by September 2022.

b. Document Schedule – The handout titled “13 May 2022 BCT Deliverable Schedule” was reviewed, and near-term documents were identified.

- A few reports have gone final since the last HTW BCT meeting, including:
 - The OU2, Sites 2/12, and OUCTP Fourth Quarter 2021 Groundwater Monitoring Reports
 - The OU2 Landfills QAPP Revision 6
 - The Groundwater QAPP Revision 10
- Comments were received on the Sites 2/12 Soil Gas Rebound Technical Memorandum and Exit Strategy, and responses are in progress.
- There are several documents under review by the regulatory agencies:
 - The 5th Five-Year Review Report
 - The Soil Gas QAPP Revision 7
 - PFAS Site Inspection (SI) Work Plan QAPP
 - In the OUCTP Third Quarter 2021 Annual Report, DTSC will check if the response to Fort Ord Community Advisory (FOCAG) comments are ok.
 - The Sites 2/12 Third Quarter 2021 Annual Report
- Upcoming documents include:
 - The Comprehensive BRA report is due to be issued in June
 - The First Quarter 2022 OU2, Sites 2/12, and OUCTP Groundwater Reports
 - The Remedial Design/Remedial Action Work Plan Addendum for installation of the new OUCTP Upper 180-Foot Aquifer extraction well

10. Action Items

The handout titled “HTW BCT 2022 Action Items” was reviewed.

- Action Item #1: The lead cleanup level status was discussed in agenda item #8.

- Action Item #2: The Five-Year Review discusses TCE in the Lower 180-Foot Aquifer. The current recommendation is to add the Lower 180-Foot Aquifer to OU2 via a decision document. The draft version of the Five-Year Review is currently under review.
- Action Item #3: Discussion about the scope of the SI Work Plan/QAPP is discussed in agenda item #12.

11. Calendar Update

The calendar was reviewed for upcoming community outreach and HTW BCT meeting dates:

- The Guided Nature Walk is scheduled for May 14, 2022.
- The Technical Review Committee (TRC) prep meeting is scheduled for July 19, 2022 at 10:00 am.
- The next HTW BCT meeting is scheduled for July 22, 2022 at 1:30 pm.
- The July HTW Community Involvement Workshop is scheduled for July 23, 2022.
- The TRC is scheduled for July 26, 2022 at 10:00 am.
- The September HTW BCT meeting is tentatively scheduled for September 21, 2022 at 1:30 pm.

12. Per- and Polyfluoroalkyl Substances (PFAS)

The handout titled “Per- and Polyfluoroalkyl Substances (PFAS) Preliminary Assessment/Site Inspection” was reviewed. Additional discussion included:

- The PFAS PA Narrative Report was issued as a Draft Final on March 30, which included a response to comments on the Draft report from the regulatory agencies and FOCAG.
 - There were concerns raised at the April 11 meeting about including the wastewater treatment plants in the SI.
 - Comments were received on the Draft Final report from the regulatory agencies but not from FOCAG.
- Project Planning Meeting #1 was an internal Army meeting to discuss the scope of the SI.
- Today’s meeting is Project Planning Meeting #2 to continue discussion with the regulatory agencies.
 - The goal of the meeting is to work out any issues before written comments are submitted to support start of fieldwork this summer to collect PFAS data.
 - USEPA, RWQCB, and DTSC indicated they have not looked at the Draft PFAS SI Work Plan/QAPP enough yet to provide comment on it.
 - USEPA said the drinking water Regional Screening Levels (RSLs) being discussed for PFAS are low.
 - RWQCB noted Worksheet #9 in the QAPP did not have any information about how the Main Garrison Sewage Treatment Plant was added to the SI.
 - RWQCB noted Site 10 Main Garrison Fire Station sampling for groundwater onsite was not recommended because PFAS would have migrated offsite. The Army responded that groundwater modeling of PFAS transport from the site indicated this is appropriate because the last time AFFF was used at Site 10 was at least 30 years ago and there would have been more mobile, shorter-chain PFAS migrating into groundwater. Soil sampling will still be conducted at Site 10 for the longer-chain, less mobile PFAS in soil. There was a remedial action at Site 10 to remove soil due to total petroleum hydrocarbon contamination. It is possible PFAS in soil was removed at that time, but some could have migrated below the excavation limits as well. One new monitoring well is proposed between the OU2 Landfills and Site 10 to

- capture potentially migrated PFAS. If PFAS is present, that confirms a release, and then an RI could be initiated.
- A conference call will be scheduled with the regulatory agencies before the end of the comment period.
 - The agencies are in acceptance of the sites selected in the first phase of the SI.
 - The sites selected for PFAS sampling in the SI Work Plan/QAPP are pretty solid based on knowledge of where AFFF was used on the sites.
 - The Site 40A helicopter defueling area incident occurred in the paved area across from the former Fritzsche Army Airfield (FAAF) fire station. Surface drainage onsite indicates that AFFF could have moved to the drainage swale to the north of the defueling area, so soil sample locations were selected there.
 - Groundwater sampling uses HydraSleeves, an accepted method for PFAS. This is what was used when sampling for PFAS at OU2 in 2019 and they worked well. They will be placed in the middle of the saturated depth of the well's screen interval.
 - Standard Operating Procedures (SOPs) were developed for sampling PFAS and are included in the attachment to the SI Work Plan/QAPP.
 - The primary source of PFAS that can be investigated based on current Army guidance is aqueous film-forming foam (AFFF).
 - The USEPA comment on the Draft Final PA Narrative Report referenced a report from the Department of Defense (DoD) Inspector General (IG) that called out DoD for too much focus on AFFF and not on other sources of PFAS. However, the DoD has not taken action on this report, and it is not considered guidance or policy.
 - The PFAS PA Narrative Report can be edited to add a statement acknowledging recommendations from the IG. Still, without official DoD guidance or policy direction, no PFAS source other than primarily AFFF can be investigated at DoD sites at this time.
 - The PFAS investigation can be updated and address sources other than AFFF once DoD guidance or policy is updated.
 - This is also true for the SI Work Plan/QAPP, which is limited to the current DoD guidance. Six of the seven sites listed in the SI had apparent historical use of AFFF.
 - The other site is the former Main Garrison wastewater treatment plant (WWTP). The Army's opinion is that the former FAAF and East Garrison WWTPs were too small, had low flows, had limited operational times, and did not receive significant PFAS-containing waste streams.
 - The Main Garrison WWTP did treat water that could have had AFFF, so this WWTP is part of the SI.
 - The RWQCB may compile its own data and have more information about the WWTPs.
 - USEPA suggested the former Fort Ord would be a safe site to test the WWTPs for PFAS.
 - The regulatory agencies have been requested to provide comments on the SI Work Plan/QAPP by May 26.