



**Final  
Hazardous and Toxic Waste (HTW) Base Realignment  
and Closure (BRAC) Cleanup Team (BCT)  
Meeting Minutes  
October 27, 2023**



BRAC Conference Room and Microsoft Teams Teleconference  
Former Fort Ord, California

**Agenda**

Reference the handout titled “HTW BRAC Cleanup Team Meeting Agenda, Friday, October 27, 2023, at 1:30 PM, Former Fort Ord, California.”

**1. Attendance and Announcements**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>By Teams</b>
<b>Avelino</b>	Sitlaly	U.S. Army Corps of Engineers (USACE)	x
<b>Bell</b>	Brett	Burleson Consulting	
<b>Cervantes</b>	Christina	Chenega for BRAC	x
<b>Clancy</b>	Maeve	U.S. Environmental Protection Agency (USEPA)	
<b>Corr</b>	Erin	USACE	
<b>Dillon</b>	Holly	Ahtna Global, LLC (Ahtna)	x
<b>Facchini</b>	Hudson	Chenega for BRAC	
<b>Floyd</b>	Bridget	USACE	x
<b>Gutierrez</b>	Alberto	California Department of Toxic Substances Control (DTSC)	
<b>Kellett</b>	MC	USACE	
<b>Kemp</b>	Jack	USACE	x
<b>Kosowski</b>	Sylvester	Ahtna	x
<b>Kowalski</b>	Bart	Chenega for BRAC	
<b>Lam</b>	Nancy	USACE	
<b>Lieberman</b>	Derek	Ahtna	
<b>Lobo</b>	Joelle	U.S. Army BRAC, Fort Ord Office	
<b>No</b>	Jason	Chenega for BRAC	
<b>Nozaki</b>	Chieko	Chenega for BRAC	
<b>Payton</b>	Curtis	U.S. Army BRAC, Fort Ord Office	
<b>Sarmiento</b>	Riz	DTSC	x
<b>Savage</b>	Tom	USACE	x
<b>Schmidt</b>	Eric	Ahtna	
<b>Sellinger</b>	Amber	California Regional Water Quality Control Board, Central Coast Region (CCRWQCB)	x
<b>Soderberg</b>	Sheila	CCRWQCB	x

Last Name	First Name	Organization	By Teams
<b>Specht</b>	James	USACE	
<b>Stiebel</b>	Cary	Chenega for BRAC	
<b>Walak</b>	Kelsey	USACE	x
<b>Weisenfeld</b>	Greg	Chenega for BRAC	

Curtis Payton introduced Joelle Lobo, who is new to U.S. Army BRAC, Fort Ord Office. Joelle is stepping into Curtis's role as the BRAC Environmental Coordinator (BEC). All correspondence for Curtis should also be sent to Joelle. All munitions response-related letters should be addressed to Curtis and HTW-related letters addressed to Joelle.

## 2. BCT Minutes Status

The HTW BCT meeting minutes are final through the last meeting in July.

## 3. Community Outreach Update

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

- The 2023 community survey and interviews are available through December 31. On July 20, the 2023 community survey began online at the Fort Ord Cleanup website. On July 25, the 2023 community survey was mailed. On July 28, the 2023 community survey was emailed.
- A few key recent activities were highlighted, including:
  - On July 15, the Community Involvement Workshop (CIW) was conducted with bus tours in the impact area with 70 community members attending.
  - On July 24, there was a media inquiry from a New York Times journalist and a request for a tour of Fort Ord. On August 2, the tour was conducted for the journalist. On September 27, the New York Times article was published. There is no further action recommended in response to this article at this time.
  - On August 31, an information table was held at the Monterey County Fair for 187 participants.
  - On September 5, a munitions recognition and safety training was conducted for York School for 150 participants.
  - On September 15, the 2021 community survey and 2021-2022 Community Outreach Program report was finalized.
  - On October 9, a media inquiry was received from a Monterey County Weekly journalist about Del Rey Oaks housing and a response was given on October 10. The article was published on October 12 and no further action is necessary.
- Upcoming activities were highlighted, including:
  - On October 28, an information table will be held at National Public Lands Day.
  - The Fort Ord Annual Report is being printed and will be mailed out to 66,000 local addresses.
- There have been comments on HTW documents. Responses to comments are in progress or already completed. There were late comments received from the Fort Ord Community Advisory Group (FOCAG) on the Draft Well Installation and Decommissioning Quality Assurance Project Plan (QAPP). The Draft Final QAPP was issued without responses to FOCAG comments, but the responses will be issued under separate cover or as an attachment to the Final QAPP.
- Photos of the New York Times article and Monterey County Fair booth were shared.

- An additional handout titled “U.S. Army Fort Ord Cleanup Community Outreach Events: 2024” was discussed including the proposed meetings and outreach events for 2024.
  - The February 10, 2024 CIW will be online and made available on that date.
  - The Technical Review Committee (TRC) meeting will be held on February 13, 2024.
  - May 11, 2024 is the proposed date for the Guided Nature Walk.
  - The CIW in-person open house and bus tours is proposed for July 13 and the TRC on July 16, 2024.
  - The handout also identified other local events that are planned to be attended.
- Maeve Clancy with the USEPA asked Amber Sellinger and Sheila Soderberg with the CCRWQCB to summarize their recent communications with a community member about per- and polyfluoroalkyl substances (PFAS).
  - Sheila received an inquiry from a community member, who requested a summary table of all the PFAS data presented in the Draft PFAS Site Inspection (SI) Narrative Report. The information is sorted by site in the report.
  - Sheila responded to the community member with a link to the report and the associated pages where the data could be found.
  - The community member was also interested in getting copies of any public notices and public outreach for PFAS at the former Fort Ord.
  - Sheila responded to the community member that public outreach efforts are different based on what the activity is. For this Draft SI Narrative Report, it was put on the Army’s public notice website and had a public comment period that has passed. Sheila provided the Army’s public page link to the community member.
  - In the last communication, Sheila gave the community member the contact information for FOCAG and the Fort Ord Environmental Cleanup Community Outreach and copied Jason No and Curtis Payton on the email.
  - There was no further communication received.
  - Curtis Payton noted that the community member also contacted the U.S. Army BRAC about the PFAS data request.
  - Maeve noted that the Draft SI Narrative Report is a Federal Facility Agreement (FFA) document.
  - The same community member had previously asked the BRAC Fort Ord Office in January 2023 about when PFAS results would be ready. Jason responded that they would be available in late spring.
  - The community member received the information requested, and no further action is needed at this time.

#### **4. Habitat Restoration**

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

- Plant survivorship monitoring was completed in September at Historic Areas (HAs) 26, 34, and 27. This monitoring is conducted for three years after planting and has been completed. Photos of the monitoring were shared.
- The Fall photo point monitoring was completed on October 10.
- In July the program Caretaker of Previous HA was started. This included removal of 119 trees from HAs 19, 26, 27, 24A, and 34.
  - The tree species removed were Monterey pine, cypress, and golden wattle. The tree stumps were sprayed with herbicide. Small trees had their roots removed by hand.
  - The trees were removed because they encroach on maritime chaparral habitat required

- for survivorship of Monterey spineflower, sand gilia, and Seaside bird's beak.
- Photos of the tree removal were shared.
- Tom Savage with USACE asked what could be bringing in the seedbank for these trees. It is speculated that, because the seeds are too heavy for wind dispersal, they are likely dispersed through birds from other areas like the Del Monte Forest and small mammals once the seeds are onsite.
- Erosion control repairs were conducted at HAs 26, 28, 34, and 27 including straw wattles, coir fabric, rill repair, and water bars. Seed broadcast is waiting for more rain in the forecast. Photos of the erosion repair activities were shared.
- Data analysis, photos, and maps from these activities will be presented in the annual report. Some preliminary results were shared in the Third Quarter report submitted on October 16.
- Burleson presented an updated slide show of Site 39 progress at the July 15 CIW.

## 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 for July and August and 96% online in September, removing approximately two pounds of chemicals of concern (COCs) per month, at approximately 950 gallons per minute (gpm) flow rate. Cumulative removal of groundwater for treatment through September will be reported in the OU2 Annual Report 9.705 billion gallons treated removing 976 pounds of chemicals of concern (COCs).
- Discharge samples were collected for July through September and they did not exceed discharge limits.
- The OU2 remedial summary shows that A-Aquifer and Upper 180-Foot Aquifer have the same COCs and the same remedies of pump and treat.
- Key events were discussed for July through October and upcoming events as listed in the handout.
- Table 2 shows the past four quarterly events maximum COC concentration for the A-Aquifer and the Upper 180-Foot Aquifer in Table 3. The table was updated with the Third Quarter 2023 data, and no changes were made to the COCs going above or below their aquifer cleanup levels (ACLs). There were minor changes in the data from the previous quarterly event.
  - The bolded and grayed cells indicate COC concentrations above ACL. The maximum concentration of a COC is compared to its ACL as a ratio in the table and the maximum concentration hydraulic zone is shown.
  - In the A-Aquifer, there are 7 out of the 11 COCs with concentrations above ACLs in the past four quarterly groundwater monitoring program (GWMP) events. The range of COC concentration/ACL ratios is approximately 1 to 7 times the ACL, with vinyl chloride the highest ratio and an outlier at 74 times the ACL. There were minor decreases since the previous event. Hydraulic Zone 5 has most of the maximum concentrations.
  - In the Upper 180-Foot Aquifer, only one COC (TCE) is above its ACL at 3 times the ACL for the maximum concentration in the past year.
  - The graph shows the trend over the past year of the COC concentration/ACL ratios, showing a general declining trend over the past year. TCE in the Upper 180-Foot Aquifer has had a slightly increasing trend until the Third Quarter 2023 event.
- The Third Quarter 2023 A-Aquifer COC plume map is still in progress. Select trends were discussed in Hydraulic Zone 5.

- The trendline for MW-OU2-05-AR shows 1,1-dichloroethane (1,1-DCA) concentration decreased in the Third Quarter 2023. There is some indication of an inverse relationship between groundwater elevation and COC concentrations.
- MW-OU2-06-AR is south of MW-OU2-05-AR. All COCs except 1,2-dichloroethane (1,2-DCA) are currently below their ACLs. 1,2-DCA had a slight increase in concentration in the Third Quarter 2023.
- MW-OU2-07-A is located upgradient of MW-OU2-05-AR, which had elevated concentrations of vinyl chloride and 1,1-DCA that have declined below their ACLs in the past few events. The groundwater elevations show an inverse relationship with the COC concentration trends.
- MW-OU2-08-A is located upgradient of MW-OU2-07-A and has had COCs decrease below their ACLs in the past year. The groundwater elevation at the well declined from 2019 to 2020 and again 2020 through 2022, after which it increased and could have made an impact on consistently low COC concentrations recently.
- MW-OU2-75-A is located upgradient of MW-OU2-08-A. There are a few COCs above their ACLs at this location with a declining trend until the Third Quarter 2023. The groundwater elevations have been declining overall, with a slightly increasing trend recently.
- The Third Quarter 2023 Upper 180-Foot Aquifer COC plume map is still in progress. Select GWMP results were discussed in Hydraulic Zone 8, which is downgradient of the extraction wells and upgradient of the discontinuity in the Intermediate 180-Foot Aquitard.
  - MW-OU2-28-180 is located downgradient in Hydraulic Zone 8 near the suspected discontinuity in the aquitard. There is a seasonal trend in COC concentrations and groundwater elevations. Over the past year, TCE has been below the ACL.
  - MW-OU2-62-180 is located upgradient in Hydraulic Zone 8 with TCE concentrations previously above the ACL in 2019 but declining since then and below the ACL in the past couple years.
- After the Third Quarter 2023 Annual Event, the recommended changes for OU2 are presented in the Annual Report and in the updated Groundwater QAPP Revision 12. The only recommended change for OU2 is MW-OU2-76-A to be sampled quarterly. It was previously recommended to reduce to annual monitoring but is a boundary well. No approval is necessary because the monitoring frequency is increasing and will begin immediately with the Fourth Quarter 2023 event.

b. Treated Water Reuse – The handout titled “Operable Unit 2 Treated Water Reuse” was reviewed. The total treated water used since October 2016 is approximately 4.4 million gallons.

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:

- A photo was shared of the Landfills Area F vegetative cover erosion in January 2023 due to heavy rains. A photo of the repair conducted in August 2023 was shared. A new subdrain was also installed.
- During the trench digging for installation of the new subdrain, a six-inch tear in the top-layer geomembrane was uncovered. A photo of the tear was shared, and a piece of the tear was shown. The tear was repaired the following day, and a photo of the repair was shared. The bottom-layer geomembrane was not compromised.
- The quarterly Monterey County Department of Health (MCDH) OU2 Landfills inspection was conducted on September 8 with no issues.

- The Third Quarter 2023 quarterly landfill gas probe monitoring was completed Aug 2 and there were no issues.
- Replacement of the TTU programmable logic controller (PLC) analog input and power supply was conducted August 25. The TTU shut down afterwards. Repairs of the TTU were conducted October 25 to replace the motor, sensors, and TTU operations were restarted.
- Landfill mowing was completed this week.
- The upcoming Fourth Quarter 2023 events include: owl box cleaning, County inspection, and perimeter probe monitoring.
- The TTU has operated for approximately 791 hours in 2023 removing approximately 162 thousand pounds of methane.
- The TTU methane influent concentration chart shows a declining trend over the past 11 years.
- There was an increase in methane concentrations from 35% to 37% because the TTU was restarted this week after two months offline.

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

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

- The GWTP was operated with a pulse pumping strategy, online for one week, and offline for one week. The GWTP was online approximately 50% of the time in July and August. Pulse pumping helped to flush out the pore spaces of stagnant higher COC concentrations. The mass of COCs removed is much smaller than the OU2 GWTP because only two extraction wells are operated at Sites 2/12 and covers a much smaller area.
- Due to increasing tetrachloroethene (PCE) concentrations, with three wells above the ACL, the GWTP restarted fulltime operation September 20, and had 70% operability for the month of September. The lower flow rate is due to lower GWTP operability.
- The soil vapor treatment unit (SVTU) was not operated over the last three months because soil gas COCs were below soil gas cleanup levels (SGCLs).
- Key events were discussed for July through September and upcoming events as listed in the handout.
- The Third Quarter 2023 GWMP PCE results were discussed.
  - Extraction well EW-12-08-180U had increasing PCE concentrations in the Third Quarter 2023 with a maximum of 15.7 micrograms per liter ( $\mu\text{g/L}$ ). It appears that increase in water level may flush out some higher concentrations.
  - MW-12-20-180U is north of EW-12-08-180U and had low PCE concentrations for a while but had results above the ACL in the Second Quarter 2023 and Third Quarter 2023. The other saturated screen interval samples at the well were collected in October, as listed in the Fourth Quarter 2023 column. It is not apparent that PCE is migrating from the vadose zone because COCs are typically heavier than water and the highest concentrations are at the deepest sample station. The increase may be correlated with increase in groundwater elevation. This PCE concentration mass is migrating into the capture area of the operational extraction wells. The previous peak of PCE was in 2017 at approximately 45  $\mu\text{g/L}$ , which also had a peak in groundwater elevations. Samples were collected at MW-12-19-180U and MW-12-25-180U and both were not detected for PCE.
  - MW-12-24-180U is adjacent to EW-12-08-180U and also had PCE concentration above the ACL in the Third Quarter 2023. Before EW-12-08-180U operation began PCE concentrations at this well were around 100  $\mu\text{g/L}$  and dropped off very quickly once operation began.
  - The Third Quarter 2023 COC plume map was shared for reference.

- The Third Quarter 2023 Soil Gas Monitoring Program (SGMP) data were presented.
  - When the SVTU is in operation, four soil vapor extraction (SVE) wells are online: VE-12-02, -06, -08, and -09. While in operation, the SVE wells are sampled; TCE was not detected and PCE was at low or not-detected concentrations.
  - The soil gas probe cluster SG-12-04 concentrations previously above the TCE soil gas cleanup level (SGCL) were reduced to well below the SGCL after the soil vapor extraction and treatment system (SVETS) was restarted in the First Quarter 2023, though minor rebound was observed in the Second Quarter 2023 after the SVETS was shut off and a similar concentration in the Third Quarter 2023.
  - Columns to the right of Table 4 indicate the last time there was an exceedance of the TCE and PCE soil gas screening level (SG-SL) or SGCL at a soil gas probe.
  - The Third Quarter 2023 COC plume map was shared for reference.
  - SG-12-01 is located close to the well MW-12-20-180U but has not had PCE concentrations above the SGCL.
  - SG-12-02, located by Target, is outside the influence of the SVETS due to the stormwater infiltration basin, but shows natural attenuation of COCs.
  - SG-12-04 trend chart shows the rebound of TCE occurring after SVETS shut down events. When the SVETS is restarted, there is an immediate reduction in TCE concentrations to below cleanup levels.
  - SG-12-07 is located in the parking lot area and has PCE concentrations with mild rebound after SVETS shutdown but remained below the SGCL.
- After the Third Quarter 2023 Annual GWMP event, the recommended changes for Sites 2/12 are presented in the Annual Report and in the updated Groundwater QAPP Revision 12.
  - MW-12-21-180U is recommended to be sampled quarterly. It was previously recommended to reduce to annual monitoring, but is a boundary well. No approval is necessary because the monitoring frequency is increasing and quarterly monitoring will begin immediately with the Fourth Quarter 2023 event.
  - MW-12-22-180U is recommended to remove from the GWMP. This reduction will take place after approval through the Groundwater QAPP Revision 12 or Annual Report.
- After the Third Quarter 2023 Annual SGMP event, the recommended changes for Sites 2/12 are presented in the Annual Report and in the updated Soil Gas QAPP Revision 9. Soil gas probe SG-12-02-65 was previously removed from the SGMP and is recommended to be added back to the annual SGMP based on PCE probe concentrations in the cluster.

## **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 OUCTP remedial summary shows that the three aquifers have different COCs and remedial strategies.
- Key events were discussed for July through October and upcoming events as listed in the handout.
- The draft Third Quarter 2023 A-Aquifer CT plume map was shared. There were minimal changes since the previous event. The Third Quarter 2023 GWMP data were discussed:
  - The max COC concentrations over the past year were compared to ACLs as ratios in Tables 1-3. There were minimal changes since the previous event. during the Third Quarter 2023 event.

- The A-Aquifer had two COCs above ACLs: CT and chloroform at 18 and 2 times their ACLs, respectively. The maximum concentration of CT was located in Hydraulic Zone 5 and the maximum concentration of chloroform was in Hydraulic Zone 4.
- The Upper 180-Foot Aquifer had CT detected approximately 15 times its ACL.
- The Lower 180-Foot Aquifer had CT and TCE detected at approximately 9 and 2 times their ACLs, respectively.
- The trend chart for the ratios shows COC concentrations generally have not changed from the First to Third Quarter 2023 events, with a decrease from the Fourth Quarter 2022 to First Quarter 2023 events.
- The Third Quarter 2023 GWMP event shallow CT concentration results in the A-Aquifer Hydraulic Zone 5 wells in the City of Marina were discussed. There is only one well with CT above the ACL in the shallow station. MW-BW-80-A is located in the middle of the plume in Hydraulic Zone 5 and had a decrease in CT concentrations during the past few events with concentrations around the ACL. This well is sampled at the two top shallowest stations, which are located five feet apart. The groundwater elevations decreased in 2020 until 2023, when it started increasing again.
- The draft Third Quarter 2023 Upper 180-Foot Aquifer CT plume map was shared and there were no changes since the previous event. MP-BW-46-170 CT concentrations have been above the ACL since installed in 2003 and has decreased in the past few events. Groundwater elevations and CT concentrations are showing a seasonal trend.
- The draft Third Quarter 2023 Lower 180-Foot Aquifer CT plume map was shared. There were changes since the previous event. The CT plume shrank since it went below the ACL at MP-BW-50. An additional CT plume was drawn around MW-BW-04-180 because it went above the ACL for the first time.
  - While it is the first time CT has been above the ACL at MW-BW-04-180, it has been close to the ACL since 2018. Groundwater elevations increased at MW-BW-04-180 in the Second Quarter 2023.
  - Upgradient multi-port MP-BW-49-316 CT trend chart shows concentrations above the ACL since installed in 2011 with a seasonal trend in CT and groundwater elevations.
  - MW-BW-59-180 had an abnormal decrease in the TCE concentration below the MCL in the Fourth Quarter 2022 with a low groundwater elevation but increased above the MCL in the past few quarterly monitoring events. TCE and groundwater elevation have a seasonal trend.
- After the Third Quarter 2023 Annual Event, the recommended changes for OUCTP are presented in the Annual Report and in the updated Groundwater QAPP Revision 12.
  - Three A-Aquifer monitoring wells and one Lower 180-Foot Aquifer monitoring well are recommended to increase sampling to quarterly due to CT concentrations above the ACL: MW-B-12-A, MW-BW-49-A, MW-BW-58-A, and MW-BW-04-180.
  - Two A-Aquifer monitoring wells are recommended to reduce monitoring to annual: EISB-EW-01 and MW-B-14-A.
  - Three A-Aquifer monitoring wells are recommended to be removed from the GWMP: EW-BW-169-A, MW-B-15-A, and MW-BW-56-A).

**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.

- A chart with Third Quarter 2023 TCE data for the Lower 180-Foot Aquifer was provided in the OUCTP handout in agenda item 7a.



- The trends for wells MW-OU2-28-180, MW-OU2-62-180, and MW-BW-59-180 were already discussed. Only MW-BW-59-180 is above the TCE MCL as of the Third Quarter 2023.
- The handout titled “ESD for TCE in the Lower 180-Foot Aquifer” was reviewed. Additional discussion included:
  - The Lower 180-Foot Aquifer is located about 200 feet below ground surface. Groundwater flows east/southeast. Most likely consists of sand and gravel with thin layers of clay or silt.
  - There is no contamination source in the Lower 180-Foot Aquifer, contaminants migrate from the Upper 180-Foot Aquifer.
  - TCE was first detected in the Lower 180-Foot Aquifer in 1999, and first detected above the MCL in 2004 at MP-BW-42-345.
  - TCE is not a COC in the OUCTP Lower 18-Foot Aquifer but is monitored to evaluate potential impacts to downgradient supply wells FO-29, FO-30, and FO-31.
  - A cross-section of wells was shown to illustrate the aquifers.
  - An Explanation of Significant Differences (ESD) is in development for addressing TCE in the Lower 180-Foot Aquifer.
    - The ESD will include TCE as a COC for the Lower 180-Foot Aquifer.
    - The ACL for TCE will most likely be 5 µg/L.
    - The anticipated remedy is monitored natural attenuation (MNA) with contingency for wellhead treatment.
    - The benefits of MNA are low cost, effectiveness because there is no ongoing source of TCE to the Lower 180-Foot Aquifer, and no hydrologic impacts to the stability of the aquifer.
    - The Draft ESD will be provided to the regulatory agencies by summer 2024.
  - Maeve Clancy noted that the USEPA does not favor an MNA remedy. The Branch Chief will be back in a few months from detail and can weigh in at that point. Though the groundwater remedies at the former Fort Ord have never had a Record of Decision (ROD) Amendment, and ESDs have been acceptable, USEPA would prefer a comprehensive ESD will also include public involvement.
  - Amber Sellinger with CCRWQCB would want some consideration for control of the TCE source in the Upper 180-Foot Aquifer if MNA is the selected remedy.
  - The suspected source of TCE is from OU2. The OU2 Upper 180-Foot Aquifer monitoring wells, MW-OU2-28-180 and MW-OU2-62-180, have TCE concentrations that are currently below the ACL. The OU2 GWTP was moved to the OU2 Landfills and the expanded extraction well networks have mitigated movement of the TCE plume towards the discontinuity in the Intermediate 180-Foot Aquitard. Therefore, the source of TCE from OU2 in the Upper 180-Foot Aquifer is not continuing to impact the Lower 180-Foot Aquifer. The Upper 180-Foot Aquifer at OUCTP is also being remediated for CT with groundwater extraction and treatment, even though there is no evidence of TCE contamination from OUCTP in the Upper 180-Foot Aquifer. However, there are TCE detections below the ACL in the OUCTP A-Aquifer and there is no known connection between OU2 and OUCTP, so OUCTP is also a possible source of TCE in the Lower 180-Foot Aquifer.
  - Maeve asked if it would be an OU2 or OUCTP ESD. Erin Corr with USACE noted that the decision has not been finalized. Maeve noted that USEPA would not have a strong opinion either way.

## 8. Per- and Polyfluoroalkyl Substances (PFAS)

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

- SI fieldwork was completed at the seven sites indicated on the map.
- The SI Narrative Report draft review was completed and responses to comments are in progress.
- The recommended actions for some of the sites now say that additional investigation is recommended as part of a Remedial Investigation (RI).
- A total of 118 comments were received on the Draft SI Narrative Report. The handout summarizes the number of comments on the same topics.
  - Some comments were received indicating that there was insufficient data for a Site Evaluation Accomplished (SEA) recommendation.
  - Comments indicated that HydraSleeves and passive sampling in general is not an accurate sampling method for PFAS. There were concerns about the turbidity seen in some of the HydraSleeve samples. It was also suggested to have a comparative study with low-flow sampling.
  - Fort Ord GWTS use granular activated carbon (GAC), which is effective for treating PFAS; however, there were concerns about redistribution of PFAS in the environment through treated water injection.
- The PFAS SI Narrative Report must be finalized by December 2023 for submittal to Congress. The Army also has internal deadlines before then to meet this requirement, meaning the document will go to Final without a Draft Final version for review. Any remaining issues will be addressed during the RI phase of the CERCLA process.
- Future BCT meetings will discuss the next steps as part of the RI phase.
- Maeve noted that, while the SI responses to comments may not be in agreement, the USEPA looks forward to coming to an agreement in the RI phase. Nationally, all sites are still learning and Fort Ord is generally ahead of the curve on the CERCLA process for PFAS.

## 9. Basewide Range Assessment (BRA) and Lead Evaluation Status

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

a. BRA – Response to FOCAG comments on the Comprehensive BRA Report and Unit 5 BRA Report will be sent for regulatory agency review.

b. Lead Evaluation at HA 18D and HA 23D – The Army has held off on preparing an ESD for Site 39 that would identify lead cleanup value for soil for a residential use scenario.

- Work on the ESD was paused after the discussion at the May 2023 HTW BCT meeting about the DTSC lead cleanup value of 80 milligrams per kilogram (mg/kg) and internal discussions with USACE toxicologists.
- The Centers for Disease Control (CDC) updated the blood lead level, and this will likely change the USEPA lead cleanup level.
- The ESD will be tabled until the USEPA has updated its lead cleanup value.
- Maeve noted that the last communication she heard from USEPA on the updated lead cleanup value timeline was December 2024.

## 10. 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.

**b. Document Schedule** – The handout titled “Former Fort Ord Document Schedule” was reviewed, and near-term documents were identified. The document schedule will be organized in a more user-friendly way in the future. There will also be some thoughts around reducing or streamlining the document review process to reduce the workload for reviewers. This may include reducing the number of QAPP updates and streamlining quarterly reports for data presentation only. Maeve noted that USEPA does not formally review and comment on quarterly reports because the BCT receives full briefings at regular meetings. She suggested just alerting the regulatory agencies of issues or unexpected data. Recommended changes to the document review process will be sent to the regulatory agencies as they are finalized.

DTSC sent an inquiry to clarify what documents are coming up in the next year to update their EnviroStor database. Documents shaded in orange on the Former Fort Ord Document Schedule are upcoming documents through approximately Spring 2024. There will be no Site 39 documents coming out.

## 11. Action Items

The handout titled “HTW BCT 2023 Action Items” was reviewed.

- Action Item #1 is still in progress and was discussed in agenda item 9b.
- Action Item #2 is still in progress and discussed in agenda item 7b.
- Action Item #3 was discussed. A guidance document was developed to determine when and how to accept offsite soil at the OU2 Landfills as future cover material. The document was sent to regulatory agencies for review. Comments were received and responses will be sent for review by November 3.

## 12. Calendar Update

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

- HTW BCT: January 25 at 1:30 pm

## HTW Governing Document References

The latest QAPPs in use and decision documents, including Records of Decision (RODs) and Explanations of Significant Differences (ESDs) are listed below. These are typically final documents not currently being reviewed. These documents can be used as references for site COCs, ACLs, monitoring, remedies, and project decision criteria.

- **Current QAPPs:**
  - Landfill Gas Revision 7: Final AR# [OU2-702S](#) (May 2023).
  - Soil Gas Revision 8: Final AR# [BW-2792V](#) (August 2023).
  - Groundwater Revision 11: Draft Final AR# [BW-2785T](#) (September 2023). To be finalized in November 2023.
- **Decision Documents:**
  - OU2:
    - ROD: AR# [OU2-480](#) (1994).
    - ESD No. 1: AR# [OU2-406](#) (1995).
    - ESD No. 2: AR# [OU2-458](#) (1996).
    - ESD No. 3: AR# [OU2-523](#) (1997).
    - ESD No. 4: AR# [OU2-656](#) (2006).
  - Sites 2/12:
    - ROD: AR# [RI-025](#) (1997).
    - ESD: AR# [BW-2794](#) (2016).

- OUCTP:
  - ROD: AR# [OUCTP-0021D](#) (2007).
  - No ESDs.
- Site 39:
  - Amendment to the Basewide ROD: AR# [RI-041E](#) (2009).
  - No ESDs.