

# Final Hazardous and Toxic Waste (HTW) Base Realignment and Closure (BRAC) Cleanup Team (BCT) Meeting Minutes July 12, 2024



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

# <u>Agenda</u>

Reference the handout titled "HTW BRAC Cleanup Team Meeting Agenda, Friday, July 12, 2024, at 10:00 AM, Former Fort Ord, California."

Last Name	First Name	Organization	In-Person	Remote
Anderson	Thor	Harris Environmental	x	
Ajello	Chris	U.S. Army Corps of Engineers (USACE)		х
Cervantes	Christina	Chenega for BRAC		х
Clancy	Maeve	U.S. Environmental Protection Agency (USEPA)		х
Corr	Erin	USACE		х
Dillon	Holly	Ahtna Global, LLC (Ahtna)		х
Facchini	Hudson	Chenega for BRAC	x	
Faulkner	David	California Department of Toxic Substances Control (DTSC)		x
Gutierrez	Alberto	DTSC	x	
Hession	Shaelyn	Ahtna		х
Kellett	MC	USACE	x	
Kowalski	Bart	Chenega for BRAC	x	
Lam	Nancy	USACE	x	
Leary	Brett	DTSC	x	
Lieberman	Derek	Ahtna	x	
Lindh	Margaret	Ahtna		х
Lobo	Joelle	U.S. Army BRAC, Fort Ord Office	x	
No	Jason	Chenega for BRAC	x	
Nozaki	Chieko	JBW Federal for BRAC	x	
Numazu	Jane	DTSC		х
Payton	Curtis	U.S. Army BRAC, Fort Ord Office	х	
Santiago	Stephanie	U.S. Army DCS, G-9 BRAC		х
Savage	Tom	USACE		х
Schmidt	Eric	Ahtna		х
Sciullo	Eric	DTSC		х

# 1. Attendance and Announcements

Last Name	First Name	Organization	In-Person	Remote
		California Regional Water Quality		
		Control Board, Central Coast Region		
Sellinger	Amber	(CCRWQCB)		x
Steckling	Karyn	CCRWQCB		х
Stiebel	Cary	PIE Services	х	
Walak	Kelsey	USACE		х
Weisenfeld	Greg	Chenega for BRAC	Х	

Nancy Lam with USACE announced that Erin Corr is temporarily filling Bridget Floyd's Section Chief position while Bridget is on maternity leave. Until Erin is back from the temporary detail in October, Nancy Lam will be backfilling Erin's position as Fort Ord Tech Lead. USACE requested that Erin Corr continues to be copied on all Fort Ord project correspondence.

Maeve Clancy with the USEPA announced that, with the shift in personnel at the USEPA, she has a new Supervisor who will oversee the Fort Ord project. The new Supervisor is Michael Schulman.

# 2. BCT Minutes Status

The May HTW BCT meeting minutes are in draft review. The USEPA has no comments.

#### 3. Community Outreach Update

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

- Analysis of the 2023 community surveys and interviews is in progress.
- The Fort Ord Cleanup Annual Report is in progress. A draft will be available for regulatory agency review by the end of July.
- A few key recent activities were highlighted, including:
  - On May 11, the annual Guided Nature Walk event was held with 43 community participants.
  - On May 17, an informational booth was held at the DLI Language Day event with 251 participants visiting the Fort Ord cleanup information table.
  - On May 29, there was an inquiry from PBS to film a documentary at the former Fort Ord to highlight in a film about the Department of Defense (DoD) budget. The request has been sent to BRAC G-9 for review and approval.
  - On June 6, a public inquiry was received from the Fort Ord Environmental Justice Network (FOEJN) and they were provided an update on Fort Ord cleanup. FOEJN noted that they will be in attendance at the Community Involvement Workshop (CIW).
  - On June 17, there was an inquiry from the Fort Ord Community Advisory Group (FOCAG) about screening levels used at the former Fort Ord.
  - There were website, mail, and email notifications about the upcoming CIW, as well as newspaper advertisements.
- Upcoming activities were highlighted, including:
  - On July 13, Fort Ord Cleanup will have the in-person CIW open house and bus tours. The bus tour route is the same as last year. Marina Coast Water District (MCWD) will be in attendance.
  - On July 16, the Technical Review Committee (TRC) meeting will be held to discuss the same topics as the CIW.

- On August 29, the BRAC office will have a Fort Ord Cleanup information booth at the Monterey County fair.
- There have been community comments on recent HTW documents. Responses to comments are in progress or already completed. MCWD was copied on one set of comments. The Army discussed the comment response process with the MCWD.
- Photos of information booth event and guided nature walk were shared.

#### 4. Habitat Restoration

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

- The photo point monitoring was completed at all 19 sites.
- The Habitat Management Plan (HMP) Annual survey was completed at historic area (HA) 38 and Austin Road Stockpile (ARS).
- The Caretaker of Previous HA task included removing invasive species when encountered such as ice plant, invasive thistles, pine trees, and French broom. Maintenance will continue as needed.
- Photos were shared of a pine tree removal process where the tree is cut down, the stump is treated so it won't grow back. The cut tree is left in place, but the pine cones were removed and taken offsite.

# 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 in May, and 99% of the time in June, removing approximately two pounds of chemicals of concern (COCs) at approximately 900 gallons per minute (gpm) flow rate for each month. Treated water injection samples were below their discharge limits.
- Table 2 shows that there was 500 gallons of treated water used in May and 1,500 gallons used in June at the OU2 Landfills.
- Key events were discussed for May through June and upcoming events as listed in the handout.
- Table 3 shows the past four quarterly events maximum COC concentration for the A-Aquifer and the Upper 180-Foot Aquifer in Table 4. The table was updated with the Second Quarter 2024 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.
  - 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 3 times the ACL, with low-ACL COCs 1,2dichloroethane at 6 times the ACL and vinyl chloride (VC) having the highest ratio at 54 times the ACL.
  - 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 a general declining in COC concentration/ACL ratios over the past couple of years.
- The First Quarter 2024 A-Aquifer COC plume map was shared. The Second Quarter 2024 plume map is in progress.
  - The PCE plume will increase in size in the Second Quarter 2024 event to be comparable to the Fourth Quarter 2023, since it decreased in the First Quarter 2024. The TCE plume size will decrease in the Second Quarter 2024 report.

- The trendline for MW-OU2-05-AR shows 1,1-dichloroethane (1,1-DCA) concentration decreased in the Fourth Quarter 2023 below the ACL. All COCs have been below ACLs for three quarters. Groundwater elevation has continued to be elevated, indicating a possible inverse relationship between groundwater elevations and COC concentrations.
- MW-OU2-06-AR is south of MW-OU2-05-AR. 1,2-dichloroethane (1,2-DCA) decreased below its ACL in the Fourth Quarter 2023. All COCs have been below ACLs for three quarters.
- MW-OU2-07-A is located upgradient of MW-OU2-05-AR and had COC concentrations below their ACLs for over a year and higher groundwater elevations.
- MW-OU2-08-A is located upgradient of MW-OU2-07-A and has had COC concentrations decrease below their ACLs in the past 1.5 years. The groundwater elevation has been consistently high.
- MW-OU2-75-A is located upgradient of MW-OU2-08-A. Chloroform and 1,1-DCA concentrations are still above their ACLs.
- The First Quarter 2024 Upper 180-Foot Aquifer COC plume map was shared. The Second Quarter 2024 plume map is in progress and will have minor changes to the TCE plume.
  - MW-OU2-28-180 is located downgradient in Hydraulic Zone 8 near the suspected discontinuity in the Intermediate 180-Foot Aquitard. There is a seasonal trend in COC concentrations and groundwater elevations, though groundwater elevations have been increasing. Over the past 1.5 years, 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 3 years.
- The RWQCB asked about the migration of COCs in Hydraulic Zone 5 and the cause of COC concentration decreases in the area. Ahtna noted that precipitation increases and groundwater elevation in the past two winters indicate a possible inverse relationship between groundwater elevation and COC concentrations and western network extraction wells are downgradient of Hydraulic Zone 5. Groundwater elevation changes in the Upper 180-Foot Aquifer are less related to precipitation changes and more related to changes in agricultural pumping in the Salinas Valley.

<u>b. Landfills Operations and Maintenance (O&M)</u> – The handout titled "Former Fort Ord Operable Unit 2 Landfills Data and Status" was reviewed. Additional discussion included:

- Key events were discussed for the Second Quarter 2024 perimeter probe monitoring, annual compliance probe monitoring, and sampling. The Third Quarter 2024 scheduled events were discussed as shown in the handout.
- The quarterly County Health inspection went well, no issues were identified.
- The landfill mowing will occur sometime between August and October.
- A more permanent fix for the erosion repair of Area F being planned.
- A summary of the thermal treatment unit (TTU) operations was presented. In 2024 so far the TTU has operated 666 hours and removed approximately 55,000 pounds of methane.
- The methane concentration at the TTU influent has been declining over time and was last measured at 35%. Generally, the amount of methane removed from the Landfills decreases over time as the Landfills age.
- The soil acceptance guidance document was revised and sent to the regulatory agencies on June 14. Alberto Gutierrez with DTSC commented that clean fill meeting residential screening levels would be ideal. RWQCB and USEPA will look at the document and provide comments within the next 30 days.

# 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 operated 49% of the time in May and 43% in June, since pulse pumping started operating the GWTP for one week and turning it off for one week.
- The soil vapor treatment unit (SVTU) restarted operation due to increasing TCE concentrations above the soil gas cleanup level (SGCL) and was operating 99% of the time in May and 100% in June at approximately 700 cubic feet per minute.
- Key events were discussed for May through June and upcoming events as listed in the handout.
- The Second Quarter 2024 GWMP tetrachloroethene (PCE) results were discussed. The First Quarter 2024 groundwater plume map was shared.
  - The COC concentrations in the groundwater at Sites 2/12 went below ACLs and thought we had reached remediation action objectives (RAOs) and the GWTP was shut down briefly in 2022. PCE concentrations rebounded above the ACL after shutting down and a pulse pumping strategy was developed. Extraction well EW-12-08-180U is sampled every two weeks after the GWTP is restarted. The PCE concentration at EW-12-08-180U has been increasing in the Second Quarter 2024. This shows the pulse pumping effectively removing PCE mass.
  - MW-12-20-180U is north of EW-12-08-180U and had low PCE concentrations for a while and then results above the ACL Second Quarter through Fourth Quarter 2023, but has been below the ACL since the First Quarter 2024. The spike in 2023 of PCE concentrations could indicate the pulse pumping flushed a PCE mass that was previously stuck by backwashing the interstitial pore spaces.
  - MW-12-24-180U is adjacent to EW-12-08-180U and had a PCE concentration above the ACL in the Third Quarter 2023 but has been below the ACL since then.
- Residential development and potential vapor intrusion risk south of Site 12 were discussed:
  - The RWQCB inquired about any work to protect the soil gas probes in the southern area of the site during construction and how involved the Army is with the development since the property was already transferred to the City of Marina.
  - Ahtna noted that the Army ensures the development does not interfere with Army remediation infrastructure. The Army coordinates with the developers to protect Army property during construction.
  - The RWQCB noted that the soil gas probes near the cinema and south of Jetty Street (soil gas probes nearest the recent development) had not been sampled in a while and asked if there had been or would be any other sampling with the residential development occurring in the area to evaluate current soil gas conditions and evaluate potential vapor intrusion risks.
  - Ahtna noted that soil gas probes are removed from the soil gas monitoring program when COC concentrations are below soil gas screening levels per the Soil Gas Quality Assurance Project Plan (QAPP), so there are no plans for additional soil gas sampling in the development area south of Jetty Street. Ahtna understood this to be commercial development, not residential.

- The RWQCB noted that the Soil Gas QAPP uses decision rules and soil gas cleanup levels for protection of groundwater and not for vapor intrusion risk. The RWQCB referred to its comments on the recent Sites 2/12 annual report and noted that the vapor intrusion risk screening levels have changed for residential short-term sensitive receptors. The RWQCB noted that the temporary soil gas probe results from the area of the current cinema compared to the new risk screening levels would have triggered additional actions.
- Ahtna noted that the Remedial Investigation/Feasibility Study (RI/FS) and the sitespecific human health risk assessment conducted in 2015 and supplemental investigation based on onsite sampling determined that there was no vapor intrusion risk in the commercial areas at Sites 2/12. Ahtna noted that soil gas analytical data is available on the internal Fort Ord database.
- USEPA inquired about the source of the southern soil gas plume. The conceptual site model (CSM) was updated during the RI/FS to indicate there are two distinct plumes. One plume in the north with a potential source at the former Directorate of Logistics Automotive Yard paint shop. The source of the plume in the south was harder to determine based on past Army activities but was addressed and remediated as part of the SVE pilot study. The area is composed of permeable dune sand and the SVE wells have a large radius of influence.
- DTSC agreed with RWQCB's comments and questions regarding ensuring vapor intrusion risks are evaluated on site and at nearby properties that are being developed.
- USEPA asked for information regarding land use controls put in place for this property and whether residential development was allowed.
- The known residential development area is an apartment complex to the south and is outside the area of interest for soil gas. The Army will look further into the new development that is potentially residential or mixed use occurring just south of Jetty Street and whether there are any deed restrictions. A separate follow-up meeting will be scheduled with the regulatory agencies to review available information.

# 7. Operable Unit Carbon Tetrachloride Plume (OUCTP)

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

- Key events were discussed for May through June and upcoming events as listed in the handout.
- The Second Quarter 2024 GWMP data were discussed:
  - The maximum COC concentrations over the past year were compared to ACLs as ratios in Tables 1 through 3.
  - The A-Aquifer had two COCs with concentrations above ACLs: carbon tetrachloride (CT) and VC. The maximum concentration ratio for CT in the A-Aquifer increased in the Second Quarter 2024.
  - The trend chart for the past couple of years shows ratios of COC concentrations have decreased since the Fourth Quarter 2022, with a slight increase in the Second Quarter 2024.
- The First Quarter 2024 A-Aquifer CT plume map was shared. The Second Quarter 2024 plume map is in progress. There will be minor changes in the plume in the Second Quarter 2024.

- The Second Quarter 2024 GWMP event shallow CT concentration results in the A-Aquifer Hydraulic Zone 5 wells in the City of Marina were discussed. MW-BW-49-A in Hydraulic Zone 5 had CT concentrations above the ACL at its shallow sampling station. Four wells had CT concentrations above the ACL at their deeper sampling stations in the Second Quarter 2024 event.
- MW-BW-49-A is the oldest well in the Hydraulic Zone 5 area. Both the shallow and deeper stations were above the CT ACL in the Second Quarter 2024.
- MW-BW-80-A is located in the middle of the plume in Hydraulic Zone 5 and had an increase in CT concentration above the ACL in the deeper station in the Second Quarter 2024. The groundwater elevation increased in the Second Quarter 2024.
- RWQCB asked for more information on the schedule for installing the three groundwater monitoring wells in Hydraulic Zone 5. The Army explained that they are updating their programmatic right-of-entry for these types of wells and are waiting for this new procedure to be finalized.
- The three new wells in Hydraulic Zone 2 were discussed.
  - MW-BW-102-A and MW-BW-103-A had concentrations of VC above the ACL in the Fourth Quarter 2023. There is no indication of an upgradient source of VC or COCs that would degrade into VC. VC was not detected in the First Quarter 2024, but was detected above the ACL at MW-BW-103-A in the Second Quarter 2024. It is still indicative of desorbing of VC from the polyvinyl chloride (PVC) well construction material, which is a temporary, short-term effect.
  - MW-BW-101-A and MW-BW-102-A had concentrations of CT above the ACL in the Fourth Quarter 2023, First Quarter 2024, and Second Quarter 2024 events. Downgradient well MW-40A-02-A, which was installed as part of the per- and polyfluoroalkyl substances (PFAS) Site Inspection, was sampled for OUCTP A-Aquifer COCs in the First Quarter 2024 and CT was not detected.
  - It was noted based on a question from the RWQCB that wells are typically only
    profiled during the first sampling event after well installation. If unusual results
    are observed during any subsequent monitoring event, the well may be reprofiled to get a better understanding of COC concentrations throughout the
    saturated screen interval.
- The First Quarter 2024 Upper 180-Foot Aquifer CT plume map was shared. The Second Quarter 2024 map is in progress. The CT plume in the north around MP-BW-46-170 will be present in the Second Quarter 2024 map. MP-BW-46-170 CT concentrations had been above the ACL since it was installed in 2003, but CT was not detected in the First Quarter 2024. CT increased again above the ACL in the Second Quarter 2024. Groundwater elevations and CT concentrations are showing a seasonal trend, typical for Upper and Lower 180-Foot Aquifer wells.
- The First Quarter 2024 Lower 180-Foot Aquifer CT plume map was shared. The Second Quarter 2024 plume map is in progress. In the Second Quarter 2024 map, the CT plume around MW-BW-04-180 will be removed.
  - MW-BW-04-180 CT concentrations were above the ACL from Third Quarter 2023 through First Quarter 2024 and went below the ACL during the Second Quarter 2024 sampling event. Groundwater elevations follow a similar pattern as CT concentrations at this well and is a seasonal trend.
  - Upgradient multi-port well MP-BW-49-316 CT trend chart shows concentrations above the ACL since it was installed in 2011, with a seasonal trend in CT concentrations and groundwater elevations.

MW-BW-59-180 has TCE concentrations above the Maximum Contaminant Level (MCL).
 TCE and groundwater elevation have a seasonal trend.

<u>b. TCE in the Lower 180-Foot Aquifer</u> – 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 Second Quarter 2024 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 discussed. Only MW-BW-59-180 is above the TCE MCL. The Second Quarter 2024 concentrations increased slightly.

# 8. Per- and Polyfluoroalkyl Substances (PFAS)

There was no handout for PFAS. Discussion included: The Fort Ord PFAS Working Group meetings will start this summer with the first meeting to be virtual and the date to be determined at a later time, but expected to begin in late August when representatives for all the regulatory agencies are available. USEPA inquired about in-person meetings or site visits. Army responded that would be possible and would discuss scheduling.

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

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

<u>a. BRA</u> – The Comprehensive BRA Report will be issued as Draft Final by August 1.

<u>b. Lead Evaluation at HA 18D and HA 23D</u> – The Army is preparing an explanation of significant differences (ESD) for Site 39 that would identify a lead cleanup value for soil for a residential use scenario consistent with the USEPA regional screening level (RSL) for lead of 200 mg/kg.

<u>c. Explanations of Significant Differences</u> – The Lower 180-Foot Aquifer TCE ESD will be issued first before the Site 39 ESD. There is no schedule yet for either ESD; however, the Draft TCE ESD may be expected by early 2025.

There was a discussion about which Operable Unit (OU) the TCE ESD would be associated with:

- The Army stated that the TCE ESD will be for OUCTP in the Lower 180-Foot Aquifer.
- The RWQCB noted that the source of TCE may be from OU2. Ahtna noted that there is TCE in the OUCTP A-Aquifer as a COC. The only COC in the Upper 180-Foot Aquifer is CT, and TCE is not monitored except at extraction wells which are connected to the OU2 GWTP. Data exists for EW-OU2-09-180 (now offline) and will be collected once the new extraction well (EW-OU2-13-180) is installed and operational. However, there is good containment of the TCE plume in the Upper 180-Foot Aquifer at OU2 and there is no continuing source of TCE to the Lower 180-Foot Aquifer.
- The RWQCB wants to make sure the decision about the OU does not restrict groundwater remedy options. The groundwater remedy for OU2 is pump and treat. The remedies differ by aquifer at OUCTP, with enhanced in-situ bioremediation (EISB) for the A-Aquifer, pump and treat for the Upper 180-Foot Aquifer, and monitored natural attenuation (MNA) for the Lower 180-Foot Aquifer.
- The USEPA noted that either site is fine for the ESD, as long as the process of the decision is transparent following the post-ROD CERCLA guidance.
- Army will provide rationale for current approach and can host separate meeting as necessary.

# **10.** Federal Facility Agreement (FFA) Schedule

<u>a. Status Update</u> – 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.

<u>b. Document Schedule</u> – The handout titled "Former Fort Ord Document Schedule" was reviewed, nearterm documents were identified, and recently received comments discussed. The top blue section lists documents being currently reviewed by the regulatory agencies and public entities. The green section lists upcoming documents. The gray section lists recently completed documents.

A contract period of performance extension was secured for documents that required an extension of the comment period for DTSC.

<u>c. Proposed Changes to HTW Documents</u> – Proposed changes to HTW documents were sent to the regulatory agencies and comments were received. Responses to comments are in progress and will be sent prior to the next HTW BCT meeting.

#### 11. Action Items

The handout titled "HTW BCT 2024 Action Items" was reviewed.

- Action Item #1 is still in progress and was discussed in agenda items 9b and 9c.
- Action Item #2 is still in progress and was discussed in agenda item 9c.
- Action Item #3 is still in progress and was discussed in agenda item 5b.
- Action Item #4 is still in progress and was discussed in agenda item 8.
- Action Item #5 is still in progress. Maeve Clancy with the USEPA noted there has been no update yet but hopes to provide an update at the first PFAS Working Group meeting.
- Action Item #6 is completed. The RWQCB noted in the last HTW BCT meeting that they did not receive notice about the Guided Nature Walk. The distribution list was corrected.
- Action Item #7 is completed. The Army conducted a website tour for the regulatory agencies.

# 12. Calendar Update

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

- CIW: July 13 in person with bus tours
- TRC: July 16
- HTW BCT: September 19 at 10:00 am
- The next HTW BCT meeting will be held either the week of November 18 or December 2.

# **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. Fort Ord document numbers given below.

#### • Current QAPPs:

- Landfill Gas Revision 8: Final <u>OU2-702V</u> (May 2024).
- Soil Gas Revision 8: Final <u>BW-2792V</u> (August 2023).
- Groundwater Revision 11: Final <u>BW-2785V</u> (November 2023).
- Groundwater Revision 11, Addendum No. 2, OUCTP Upper 180-Foot Aquifer Extraction Well Installation: Final <u>BW-2928B</u> (May 2024).

#### • Decision Documents:

- **OU2**:
  - ROD: <u>OU2-480</u> (1994).
  - ESD No. 1: <u>0U2-406</u> (1995).
  - ESD No. 2: <u>OU2-458</u> (1996).
  - ESD No. 3: <u>OU2-523</u> (1997).
  - ESD No. 4: <u>OU2-656</u> (2006).
- Sites 2/12:
  - ROD: <u>RI-025</u> (1997).
  - ESD: <u>BW-2794</u> (2016).
- OUCTP:
  - ROD: <u>OUCTP-0021D</u> (2007).
- Site 39:
  - ROD: <u>RI-025</u> (1997).
  - ROD Amendment: # <u>RI-041E</u> (2009).