Site Inspection Report for Per- and Polyfluoroalkyl Substances at SVAD-067 – Fire Training Area and SVAD-084 – Scrap Wood Open Burn Area

Savanna Army Depot Activity Savanna, Illinois



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Contract No. W912QR-16-C-0003 Delivery Order No. W912QR18F0137 Leidos CRN 325415

February 2021

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CERTIFICATION 4 CONTRACTOR STATEMENT OF INDEPENDENT TECHNICAL REVIEW

Leidos has completed the Site Inspection Report for Per- and Polyfluoroalkyl Substances at SVAD-067 – Fire Training Area and SVAD-084 – Scrap Wood Open Burn Area at Savanna Army Depot Activity, Savanna, Illinois. Notice is hereby given that an independent technical review has been conducted that is appropriate to the level of risk and complexity inherent in the project as defined in the Leidos Quality Assurance Plan. During the independent technical review, compliance with established policy principles and procedures, using justified and valid assumptions, was verified. This included review of assumptions, methods, procedures, and materials used in analyses; the appropriateness of data used and the level of data obtained; and reasonableness of the results, including whether the product meets the customer's needs consistent with the law and existing U.S. Army Corps of Engineers (USACE), Louisville District policies.

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February 19, 2021 Date

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Significant concerns and explanation of the resolutions are documented within the project file.

As noted above, all concerns resulting from independent technical review of the project have been considered.

Lisa Jones-Bateman, REM, PMP Senior Program Manager

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LIST OF ACRONYMS AND ABBREVIATIONS

%R	Percent Recovery
AFFF	Aqueous Film-Forming Foam
APE	Ammunition Peculiar Equipment
ASD	Assistant Secretary of Defense
BCT	BRAC Cleanup Team
BEC	BRAC Environmental Coordinator
BLS	Below Land Surface
BRAC	Base Realignment and Closure
BTOC	Below Top of Casing
CCB	Continuing Calibration Blank
cis-1,2-DCE	cis-1,2-Dichloroethene
CCV	Continuing Calibration Verification
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CLP	Contract Laboratory Program
CoC	Chain-of-Custody
COC	Chemical of Concern
cPAH	Carcinogenic Polynuclear Aromatic Hydrocarbon
CSM	Conceptual Site Model
DACS	(U.S. Army) Defense Ammunition Center and School
DCQAP	Data Collection Quality Assurance Plan
DERP	Defense Environmental Restoration Program
DGPS	Differential Global Positioning System
DI	Deionized
DL	Detection Limit
DO	Delivery Order
DoD	U.S. Department of Defense
DQA	Data Quality Assessment
DQO	Data Quality Objective
DWEL	Drinking Water Equivalent Level
EBS	Environmental Baseline Survey
FP	Field Procedure
FS	Feasibility Study
FTA	Fire Training Area
FTP	Field Technical Procedure
HA	Health Advisory
HASP	Health and Safety Plan
HQ	Hazard Quotient
I.D.	Identification
ICB	Initial Calibration Blank
IDW	Investigation-Derived Waste
IEPA	Illinois Environmental Protection Agency
IRP	Installation Restoration Program
IS	Internal Standard
ISGS	Illinois State Geological Survey
ISPCS	Illinois State Plane Coordinate System
JULIE	Joint Utility Locating Information for Excavators
K	Hydraulic Conductivity
L&D	Lock and Dam
LCL	Lower Control Limit

LIST OF ACRONYMS AND ABBREVIATIONS (Continued)

LCS	Laboratory Control Sample
LHA	Lifetime Health Advisory
LOD	Limit of Detection
LOQ	Limit of Quantitation
LRA	Local Redevelopment Authority
LRS	Licensed Regulatory Specialist
MCL	Maximum Contaminant Level
MEC	Munitions and Explosives of Concern
MPPEH	Material Potentially Presenting an Explosive Hazard
msl	Mean Sea Level
MS	Matrix Spike
MSD	Matrix Spike Duplicate
NA	Not Applicable
NCDC	National Climatic Data Center
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NOAA	National Oceanic and Atmospheric Administration
NPL	National Priorities List
NTCRA	Non-Time Critical Removal Action
NTU	Nephelometric Turbidity Unit
OASM	(U.S. Army) Ordnance Ammunition, Surveillance, and Maintenance
OSHA	Occupational Safety and Health Administration
P.E.	Professional Engineer
P.G.	Professional Geologist
РАН	Polynuclear Aromatic Hydrocarbon
PARCC	Precision, Accuracy, Representativeness, Comparability, and Completeness
PCB	Polychlorinated Biphenyl
PCE	Tetrachloroethene
PFAS	Per- and Polyfluoroalkyl Substances
PFBS	Perfluorobutane Sulfonate
PFHpA	Perfluoroheptanoic Acid
PFHxS	Perfluorohexane Sulfonate
PFNA	Perfluorononanoic Acid
PFOA	Perfluorooctanoic Acid
PFOS	Perfluorooctane Sulfonate
PMP	Project Management Professional
PPE	Personal Protective Equipment
PVC	Polyvinyl Chloride
QA	Quality Assurance
QC .	Quality Control
QSM	Quality Systems Manual
RCRA	Resource Conservation and Recovery Act
REM	Registered Environmental Manager
RfD	Reference Dose
RI	Remedial Investigation
RPD	Relative Percent Difference
RSL	Regional Screening Level
SCS	Soil Conservation Service
SDG	Sample Delivery Group
SDWA	Safe Drinking Water Act

LIST OF ACRONYMS AND ABBREVIATIONS (Continued)

SI	Site Inspection
SOD	Savanna Ordnance Depot
SOP	Standard Operating Procedure
SOW	Statement of Work
SPG	Savanna Proving Grounds
SVDA	Savanna Army Depot Activity
SVOC	Semivolatile Organic Compound
TCE	Trichloroethene
TCLP	Toxicity Characteristic Leaching Procedure
TOC	Top of Casing
UCL	Upper Control Limit
UCMR3	Third Unregulated Contaminant Monitoring Rule
UFP-QAPP	Uniform Federal Policy Quality Assurance Project Plan
UN	United Nations
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
UXO	Unexploded Ordnance
VOC	Volatile Organic Compound

1. INTRODUCTION

This report documents the results of the U.S. Army Base Realignment and Closure Division's (Army's) Site Inspection (SI) for perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) at the Fire Training Area (SVAD-067) and the Scrap Wood Open Burn Area (SVAD-084) at Savanna Army Depot Activity (SVDA), Savanna, Illinois. Figure 1-1 presents the location of SVDA. The Army conducted this SI in accordance with its authority as the lead agency under Executive Order 12580, which authorizes the U.S. Department of Defense (DoD) to implement environmental response actions in compliance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended. This document was prepared by Leidos under Contract No. W912QR-16-D-0003, Delivery Order (DO) No. W912QR18F0137 with the U.S. Army Corps of Engineers (USACE), Louisville District.

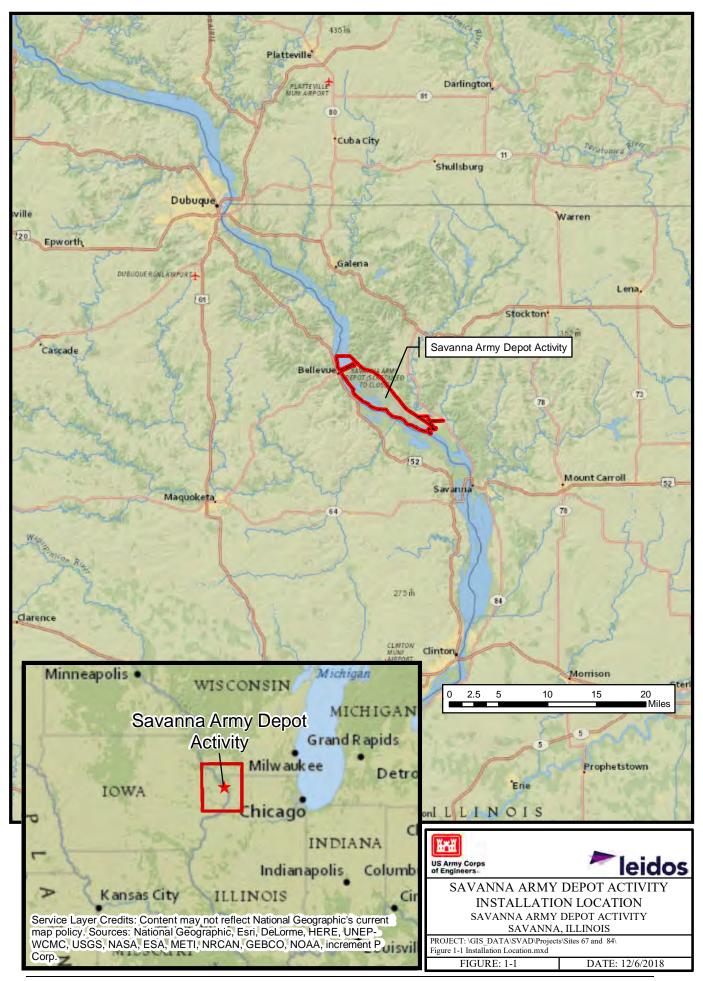
The primary objective of the SI was to determine the presence or absence of PFOS or PFOA in groundwater at SVAD-067 and SVAD-084 at concentrations exceeding the U.S. Environmental Protection Agency (USEPA) drinking water lifetime health advisory (LHA) and the tap water regional screening level (RSL) cited in the October 2019 Assistant Secretary of Defense (ASD) Investigating Per- and Polyfluoroalkyl Substances (PFAS)¹ within the DoD Cleanup Program Memorandum (ASD 2019). This SI was conducted in accordance with CERCLA; the Defense Environmental Restoration Program (DERP); the National Oil and Hazardous Substances Pollution Contingency Plan (NCP); and DoD, Army, and USEPA guidance documents.

In 2012, USEPA, under the Safe Drinking Water Act (SDWA), published the Third Unregulated Contaminant Monitoring Rule (UCMR3), which required public water supplies across the country to sample for a list of 30 unregulated contaminants, including 6 PFAS:

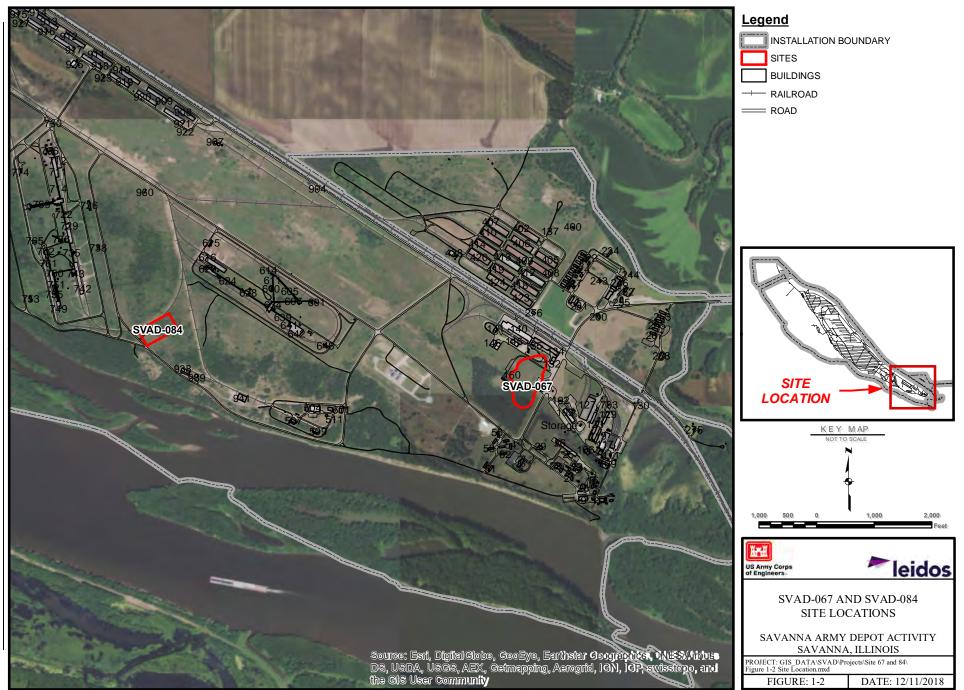
- PFOS
- PFOA
- Perfluorobutane sulfonate (PFBS)
- Perfluorononanoic acid (PFNA)
- Perfluoroheptanoic acid (PFHpA)
- Perfluorohexane sulfonate (PFHxS).

Results of the UCMR3 indicated detections of PFAS at numerous locations, including several near DoD facilities. PFAS have been extensively manufactured and used worldwide for a variety of purposes. PFAS are commonly used as additives to paper, packaging, clothing, carpets, sporting equipment, non-stick cookware, cleaners, pesticides/herbicides, adhesives, paints, varnishes, sealants, hydraulic fluid, and surfactants to enhance product performance. Due to the ubiquitous nature of PFOS/PFOA, its likely use, storage, and incidental releases of other PFOS/PFOA-containing products in small quantities occurred during the operational history of SVDA. However, in general, PFAS detections related to DoD facilities are often linked to the use of aqueous film-forming foam (AFFF), which contains various PFAS are emerging contaminants and historically have not been analyzed during site characterizations; therefore, minimal sampling data exist for most sites.

In 2016, USEPA issued a drinking water health advisory (HA) for PFOS and PFOA. The LHA is 70 nanograms per liter (ng/L) for each compound and the combined total of PFOS and PFOA. When AFFF is released to the environment, PFAS can migrate into soil and groundwater. Once in the environment, the compounds are persistent and may migrate through airborne transport, surface water, groundwater, and/or biologic uptake. The amount of PFAS that enters the environment depends on the type and amount of AFFF used, where and when it was used, the type of soil, and other factors. If private or public wells are located nearby, they could potentially be affected by PFAS. Similarly, surface water features may be impacted and may convey PFAS to downgradient receptors.







In accordance with the June 10, 2016, Department of the Army policy regarding PFOS/PFOA contamination assessment (Department of the Army 2016), the Army sampled the SVDA Lower Post drinking water on September 26, 2016. The groundwater production well provides the sole source of potable water for the Installation. This well, also known as the Lower Post Bedrock Well, is located in Building 107 and is approximately 1,200 feet deep. The six UCMR3 PFAS compounds were analyzed for and not detected (Appendix A).

Although the shallow groundwater at SVDA is not a drinking water source, SVAD-067 and SVAD-084 are under investigation because they were historically used as fire training areas (FTAs) in the Lower Post and Plant Area (Figure 1-2). Based on the timeline for development of AFFF, AFFF-containing PFAS was unlikely to have been used until after 1966. The SVAD-067 FTA was used for approximately 40 years (in use as early as 1947) to train firefighters in various methods of controlling oil-related fires (SAIC 1999a). SVAD-084 was used once a year for an FTA for more than 20 years (Clarke 1996) (use assumed to start in the 1970s). This SI Report presents the results of groundwater investigations at SVAD-067 and SVAD-084 and evaluation for the potential of the six UCMR3 PFAS compounds in groundwater. The scope and objectives for the SI at SVAD-067 and SVAD-084 are defined in Section 1.1. A description of the Installation is provided in Section 1.2, descriptions of SVAD-067 and SVAD-084 are presented in Section 1.4.

1.1 SCOPE AND OBJECTIVES

The SI scope included preparation of project planning documents; field investigations; validation and management of analytical data; comparison of analytical data to screening levels; and documentation of the investigation results. This project was conducted in accordance with the Uniform Federal Policy Quality Assurance Project Plan (UFP-QAPP) Addendum 2 for the SI at SVAD-067 and SVAD-084 (Leidos 2018a) and the Health and Safety Plan (HASP) Addendum 2 for the SI at SVAD-067 and SVAD-084 (Leidos 2018b). These documents were submitted to the Army, Illinois Environmental Protection Agency (IEPA), and USEPA Region 5 for review and approval prior to the initiation of field activities. Field sampling and laboratory chemical analyses were conducted in accordance with project-specific quality assurance/quality control (QA/QC) and health and safety requirements.

The primary objective of the SI was to determine the presence or absence of PFOS or PFOA in groundwater at SVAD-067 and SVAD-084 at concentrations exceeding the USEPA drinking water LHA and the tap water RSLs that are the residential scenario screening levels calculated using the USEPA RSL calculator and referenced in DoD guidance (ASD 2019). While groundwater samples at SVAD-067 and SVAD-084 were analyzed for the six UCMR3 PFAS compounds, USEPA has calculated LHAs and DWELs for only PFOS and PFOA. Thus, only groundwater sampling results for site concentrations of PFOS and PFOA were compared to the USEPA LHA and DWEL to determine whether the potential exists for human health risk from drinking water.

1.2 INSTALLATION DESCRIPTION

SVDA is located in northwestern Illinois adjacent to the Mississippi River in Jo Daviess and Carroll counties (Figure 1-1). The Installation is in the central lowlands of the interior plains physiographic province, approximately 7 miles north of the city of Savanna, Illinois; 27 miles north of Clinton, Iowa; and approximately 150 miles west of Chicago, Illinois. The Installation occupied 13,062 acres at the time of closure and is bordered by agricultural land to the north and east, the Apple River to the southeast, and the Mississippi River to the south and west.

The U.S. Army purchased the property for the Installation in 1917 for the construction of a proving and test facility for artillery and ammunition. The Installation officially was activated as Savanna Proving Grounds (SPG) on December 26, 1918, and proof testing activities were conducted through approximately August 1919. Ordnance storage facilities were expanded between 1918 and 1921 when the facility began a

transition from proving ground to ordnance depot and was renamed Savanna Ordnance Depot (SOD). Intensive construction of additional magazines, administrative buildings, bomb plants, and shell-loading plants was completed between December 1939 and November 1941.

The Installation was re-designated as a U.S. Army Ordnance Depot in 1959 and received a special weapons mission in January 1961, requiring a special ammunition area for assembly, disassembly, and storage as part of the Installation's operations. The Installation was placed under the jurisdiction of the U.S. Army Supply and Maintenance Command in 1962 and its name was changed to Savanna Army Depot.

Ammunition maintenance and supply operations at SVDA were reduced in 1972 and the special weapons storage and maintenance mission was terminated in 1974. The U.S. Army Ordnance Ammunition, Surveillance, and Maintenance (OASM) School, activated at the Installation in 1950, included the addition of a special weapons workshop in 1970. The school was renamed in 1979 as the U.S. Army Defense Ammunition Center and School (DACS). From 1984 until March 2000, the mission at SVDA was the receipt, storage, issuance, and demilitarization of conventional ammunition and general supplies, which included manufacturing, procurement, and repair of ammunition peculiar equipment (APE) parts for worldwide DoD support and QA of stored ammunition. The QA mission provided ammunition and explosive QA for conventional ammunition, guided missiles, large rockets, ammunition components, explosives, and packing material.

SVDA was placed on the National Priorities List (NPL) in 1984. The CERCLA Installation Restoration Program (IRP) activities have been ongoing at the Installation since 1990. The facility was identified for closure in 1995 under the Base Realignment and Closure (BRAC) process and all industrial activities ceased when SVDA officially closed in March 2000. Currently, the only onsite Army activities are associated with the assessment and remediation of site-related contamination as required under CERCLA and BRAC and the preparation for transferring ownership of various parcels of land to non-DoD entities (SAIC 1999a).

1.3 FIRE TRAINING ACTIVITIES AT SVAD-067 AND SVAD-084

Fire training activities at SVAD-067 and SVAD-084 were determined to have utilized AFFF based on historical records reviews (SAIC 1999a) and recent interviews with a former SVDA Fire Chief. The former Fire Chief was a firefighter during the 1960s and 1970s and was the SVDA Fire Chief from 1987 to 1995. The former Fire Chief indicated that FTA activities at SVAD-067 utilized AFFF mixed with water. The former SVDA employee noted that FTA activities at SVAD-084 were conducted with water and 3M Light Water. 3M Light Water was the brand name for a firefighting foam manufactured by 3M that contained PFOS. Consequently, the groundwater at SVAD-067 and SVAD-084 was evaluated to determine the presence or absence of PFOS or PFOA above the USEPA LHA and the tap water RSLs that were calculated using the USEPA RSL calculator and referenced in DoD guidance (ASD 2019) as a result of DoD activities. SVAD-067 and SVAD-084 site locations are shown in Figure 1-2.

1.4 REGULATORY OVERVIEW AND PROJECT ACTION LIMITS

As discussed in Section 1.0, in 2012, USEPA published the UCMR3, which required public water supplies across the country to sample for a list of 30 unregulated contaminants, including 2 chemicals of concern (COCs) relevant to this SI (PFOS, PFOA). PFAS detections at DoD facilities are often linked to the use of AFFF, which may contain one or more of these chemicals. AFFF is a firefighting agent used to suppress fires involving petroleum hydrocarbons. The USEPA LHA was established as the project action limit in the UFP-QAPP Addendum 2 for the SI at SVAD-067 and SVAD-084 (Leidos 2018a). Subsequent to the establishment of the SVAD-067 and SVAD-084 project actions levels, the Army issued guidance for investigating PFAS within DoD cleanup programs, which calculated tap water RSLs using the USEPA RSL calculator (ASD 2019).

Detected concentrations of PFAS in environmental samples collected during the SI were compared against the USEPA LHAs for PFOS and PFOA and tap water RSLs for PFOS, PFOA, and PFBS, as described below and listed in Table 1-1.

Parameter	Chemical Abstract Service Number	Tap Water RSL (ng/L) ª	USEPA Health Advisory ^b (ng/L)
PFOS	1763-23-1	40	70.0 ^c
PFOA	335-67-1	40	
PFBS	375-73-5	40,000	N/A

Table 1-1. SI Project Action Limits Savanna Army Depot Activity, Savanna, Illinois

^a The tap water screening levels of 40 ng/L for PFOS and PFOA and 40,000 ng/L for PFBS are cited in the ASD *Investigating Per- and Polyfluoroalkyl Substances within the Department of Defense Cleanup Program Memorandum* (ASD 2019). These are residential scenario screening levels calculated using the USEPA RSL calculator (HQ=0.1). The screening level of 40 ng/L does not apply to the combined concentrations of PFOS and PFOA.

^b Drinking Water Health Advisory for Perfluorooctane Sulfonate (USEPA 2016a) and Drinking Water Health Advisory for Perfluorooctanoic Acid (USEPA 2016b). ^c When PFOA and PFOS are both present, the combined detected concentrations of the compounds are compared with the 70-ng/L health advisory value.

Currently, no legally enforceable Federal standards, such as maximum contaminant levels (MCLs), exist for PFAS in water. However, under SDWA, USEPA issued a series of Health Advisories (HAs) for PFOS and PFOA, including the most recent in May 2016. To provide Americans, including the most sensitive populations, with a margin of protection from a lifetime of exposure to PFOS and PFOA in drinking water, USEPA established an LHA level for PFOS and PFOA (combined) of 70 ng/L. The LHA of 70 ng/L applies to PFOS and PFOA individually as well as combined. That is, if an individual compound is detected >70 ng/L, the screening level is exceeded. In addition, if individual compounds are <70 ng/L but the sum of the PFOS and PFOA compounds is >70 ng/L, the screening level is exceeded. USEPA issued the PFAS Action Plan in February 2019. The PFAS Action Plan is the first multi-media, multi-program, national research, management, and risk communication plan to address PFAS and outlines the tools USEPA is developing to address PFAS in drinking water, identify and clean up PFAS contamination, expand monitoring of PFAS manufacturing, increase PFAS scientific research, and promote effective enforcement tools.

ASD issued an Investigating PFAS within the DoD Cleanup Program Memorandum (ASD 2019). RSLs for PFOS, PFOA, and PFBS have been calculated using the established oral reference doses (RfDs) of 2E-05 mg/kg-day (PFOS and PFOA) and 2E-02 mg/kg-day (PFBS). The document further states that when multiple PFAS are encountered at a site, a 0.1 factor is applied to the screening level. The resulting RSLs are provided in Table 1-1. In this document RSLs were used for screening to determine if further investigation is warranted. Therefore, the groundwater data for individual concentrations of PFOS and PFOA also were compared to this screening level of 40 ng/L. Note however, that both the LHA and the tap water RSLs are screening levels for drinking water exposure, and the shallow groundwater at SVDA is not used as a source of drinking water.

1.5 REPORT ORGANIZATION

The contents of this SI Report are summarized below:

• *Section 2. Environmental Setting*—This section discusses the environmental setting at SVDA. Demographics, land use, geology, hydrogeology, hydrology, soil, and climate are described.

- *Section 3. Field Investigation Activities and Procedures*—This section provides field procedures followed during the investigations.
- Section 4. Laboratory Chemical Analysis Program and Quality Assurance Summary—This section describes the laboratory chemical analysis program for the investigation. Sample handling procedures, laboratory equipment calibration, laboratory analytical methods, data reporting and validation, and sample data QA/QC are discussed.
- Sections 5 (SVAD-067) and 6 (SVAD-084). Site History and Nature of Detected Chemicals—Sections 5 (SVAD-067) and 6 (SVAD-084) present the site history, field investigation, and site-specific results of the SI activities and includes a discussion of the nature of chemical constituents, and results of data screening.
- *Section 7. Summary and Conclusions*—This section presents a summary of the SI and presents conclusions for SVAD-067 and SVAD-084.
- Section 8. References—This section lists the references that were used in the preparation of this report.
- *Appendices*—Appendices A through E include data from field activities or related assessments:
 - Appendix A. SVDA Drinking Water PFAS Data
 - Appendix B. Well Construction, Well Development, and Groundwater Sampling Logs
 - Appendix C. Topographic Survey Results
 - Appendix D. Data Quality Assessment (DQA)
 - Appendix E. Data Presentation Tables
 - Appendix F. Regulatory Comments and Army Responses to Comments.

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2. ENVIRONMENTAL SETTING

The Fire Training Area (SVAD-067) and the Scrap Wood Open Burn Area (SVAD-084) are on the Lower Post and Plant Areas at SVDA. The environmental setting for these areas, including aspects of the facility location, demographics and land use, physiography and topography, climate and meteorology, geology, hydrogeology, surface water hydrology, and soils, is discussed in this section. Descriptions of environmental conditions were compiled from information in the Environmental Baseline Survey (EBS) (SAIC 1999a), from reports and data prepared by the U.S. Geological Survey (USGS), Illinois State Geological Survey (ISGS), Soil Conservation Service (SCS), U.S. Bureau of Census, National Climatic Data Center (NCDC), National Oceanic and Atmospheric Administration (NOAA), and site-specific historical project reports.

2.1 INSTALLATION AND SITE LOCATION

SVDA is in northwestern Illinois adjacent to the Mississippi River in Jo Daviess and Carroll counties, Illinois. The majority of the northern and central portions of the Installation are in Jo Daviess County and the southernmost acreage is in Carroll County. SVAD-067 and SVAD-084 are both in Carroll County.

The Installation occupied 13,062 acres at the time of closure and is approximately 7 miles north of the city of Savanna, Illinois; 27 miles north of Clinton, Iowa; and approximately 150 miles west of Chicago, Illinois. SVDA is bordered by agricultural land to the north and east, the Apple River to the southeast, and the Mississippi River to the west. The Installation is mapped on the Blackhawk, Illinois and Green-Island, Iowa USGS quadrangle maps between coordinates 466,000 feet to 484,000 feet (east) and 2,006,000 feet to 2,017,000 feet (north) in the Illinois (west) State Plane Coordinate System (ISPCS).

2.2 DEMOGRAPHICS AND LAND USE

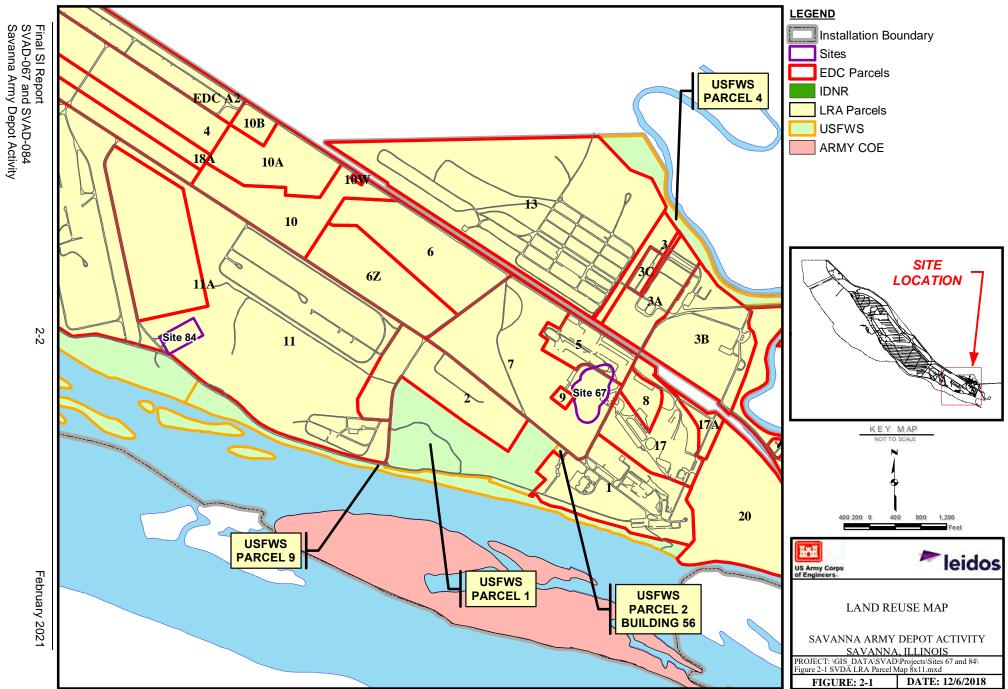
The area immediately surrounding SVDA is sparsely populated with the communities of Bellevue, Iowa (2010 population 2,191); Hanover, Illinois (2010 population 844); and Savanna, Illinois (2010 population 3,729) located within a 7-mile radius. A combined population of 38,065 in Jo Daviess and Carroll counties, Illinois (U.S. Census Bureau 2012). According to the 2010 census, 74 to 77 percent of residents in Jo Daviess and Carroll counties live in rural areas (U.S. Census Bureau 2012). With the closure of SVDA, the current population on the Installation consists of a limited number of U.S. Army civilian personnel, USACE personnel, and Local Redevelopment Authority (LRA) lease holders. No resident populations exist within SVAD-067 or SVAD-084.

The Jo-Carroll LRA has determined that SVAD-067 and SVAD-084 will be re-developed for industrial/commercial land use. The Land Reuse Plan (ERA 1997) and Reuse Plan Map (MSA 1999, revised by Leidos 2018c) is shown in Figure 2-1.

2.3 PHYSIOGRAPHY AND TOPOGRAPHY

SVDA is located in the central lowlands of the Interior Plains physiographic province of Illinois within the "Driftless Area" of northern Illinois. Primary landforms immediately surrounding the Installation consist of oxbow lakes and broadly sloping surface topography that reflect the impact of historical meandering and flooding by the ancestral Mississippi River and tributaries.

The physiography east and north of the area of historical Mississippi River influence consists of steep upland hills that are heavily dissected by erosion (USGS 1975). Drainage occurring north and northeast of the Installation is through the Apple River and Rush Creek basins, which flow southeastward toward the Mississippi River. The Apple River meanders from the upland area at Hanover toward the Mississippi River and forms the southeastern boundary of the Installation. Ordnance School Lake occurs at the confluence of the Apple and Mississippi Rivers in the southeastern corner of the Installation.



Surface topography on the central upland areas at SVDA consists of gently rolling hills with elevation from approximately 600 to 660 feet above mean sea level (msl). The Upper Post at SVDA is bordered to the west by an extensive backwater slough complex of the Mississippi River consisting of braided or meandering streams and isolated catchments. The backwater areas are only slightly elevated (588 to 600 feet above msl) above the average stage of the Mississippi River and are subject to flooding. The active Mississippi River channel flows west of the backwater areas and directly borders the southern portion of SVDA.

2.4 CLIMATE AND METEOROLOGY

SVDA is in an area with a typical continental climate that is characterized by cold winters; warm summers; and frequent short-term fluctuations in temperature, humidity, cloudiness, and wind direction. The winds are controlled primarily by storm systems and weather fronts that move eastward and northeastward across the area. Storm systems are prevalent primarily in the winter and spring. Summer thunderstorms are relatively short, and autumn is generally warm, ending abruptly with renewed storm systems in November.

NCDC data for Bellevue, Iowa at Lock and Dam (L&D) #12 for the years between 1951 and 2016 indicate that average monthly temperatures range from 7°F to 80°F (Iowa State University 2017). The average monthly temperature is below 32°F 1 to 5 months per year, commonly occurring between November and March. In contrast, the area experienced a temperature of at least 90°F an average of 12 days each year between 1951 and 2016 principally during the summer months (Iowa State University 2017). The soil freezes to a depth of approximately 2 feet below land surface (BLS) and may remain snow-covered for weeks at a time. Monthly average air temperatures for the period from 1951 to 2016 are shown in Table 2-1.

Month	Maximum Average Temperature (°F)	Minimum Average Temperature (°F)
January	32.5	7.3
February	36.1	10.7
March	51.0	21.7
April	56.0	42.5
Мау	67.7	52.6
June	74.1	64.4
July	79.8	67.0
August	77.5	63.8
September	69.3	56.0
October	61.9	44.8
November	47.3	29.6
December	36.6	11.3

Table 2-1. Monthly Average Air Temperature for Lock and Dam #12 Station (1951-2016) Savanna Army Depot Activity, Savanna, Illinois

Source: Iowa Environmental Mesonet, Iowa State University 2017

The average total annual precipitation in Bellevue, Iowa, between 1951 and 2016 was 34.6 inches (Iowa State University 2017) with a maximum of 51.08 inches (2009) and a minimum of 20.4 inches (1988). The driest months are December through February with average rainfall from 1.17 to 1.73 inches per month, and the wet season occurs from April to September with average monthly precipitation between 3.4 to 4.61 inches per month (Iowa State University 2017). Table 2-2 provides a monthly summary of precipitation at Bellevue, Iowa L&D #12 over a 65-year period from 1951 to 2016. The summer months are characterized by short duration, localized showers; however, summer thunderstorms may be severe and are sometimes accompanied by hail or destructive wind. Flooding frequently occurs with the breakup of river ice in late winter and early spring, especially if a thick snow cover has been removed by rain or unseasonably warm temperatures.

Month	Maximum Precipitation (in)	Minimum Precipitation (in)	Average Precipitation (in)
January	4.87	0.08	1.17
February	3.61	0.00	1.24
March	5.29	0.34	2.22
April	8.47	0.85	3.48
Мау	8.25	0.7	3.77
June	10.76	0.62	4.61
July	9.41	0.3	3.87
August	9.82	0.73	4.05
September	10.69	0.12	3.4
October	8.96	0.00	2.79
November	6.11	0.11	2.35
December	4.96	0.26	1.73

Table 2-2. Monthly Precipitation Statistics for
Lock and Dam #12 Station (1951-2016)Savanna Army Depot Activity, Savanna, Illinois

Source: Iowa Environmental Mesonet, Iowa State University 2017

SVDA has experienced snow 6 to 36 times per year between 1951 and 2016 with an average of 17 snowfalls per year (Iowa State University 2017). Average annual snowfall in Bellevue, Iowa from 1951 through 2012 was 31.45 inches (Iowa State University 2013), ranging from 9.1 to 64.6 inches. The highest snowfall totals occur between December and March with lesser amounts in November and April. Snow is relatively lacking between May and October. Heavy snow, greater than 10 inches deep, occurs infrequently, and prevailing winds tend to pile the snow into high drifts. Moderate to heavy ice storms occur annually. Damaging winds may develop into tornadoes at any time of year but are more likely to occur from March through June.

2.5 SURFACE WATER HYDROLOGY

Surface water features affecting the hydrology at SVDA consist of rivers and streams draining areas to the north of SVDA, Mississippi River backwater areas to the southeast, and changes in Mississippi River stage. Surface water runoff from the elevated bluffs northeast of SVDA is drained onto the northern and central portions of the facility predominantly through intermittent streams along the northeastern Installation boundary. Surface drainage from the developed Installation areas is predominantly radial from the plateau areas toward the surrounding lower-lying areas. No surface water features are located on SVAD-067 or SVAD-084. The nearest water body is the Mississippi River, which is approximately 2,000 feet south of SVAD-067 and 1,000 feet south of SVAD-084.

2.6 SVDA GEOLOGY AND HYDROGEOLOGY

Regional geology at SVDA is characterized by Wisconsinan-aged glacial deposits and recent alluvium underlain by Paleozoic bedrock. The Parkland Sand and Henry Formation are the uppermost units encountered beneath the Installation and consist of sand deposits extending to a maximum depth of approximately 170 feet BLS (Dames & Moore 1994). The Parkland Sand consists of wind-blown, fine- to medium-grained sand deposited as dunes or sheet-like units. The Parkland Sand grades to more coarse

deposits of the Henry Formation at approximately 110 feet BLS. The Henry Formation consists of moderately to poorly sorted, glacially derived sand and gravel and medium- to coarse-grained sandy outwash deposits that contain occasional silt lenses. The glacial deposits are overlain in portions of the SVDA facility by recent sediments associated with migration or episodic flooding of the Mississippi and

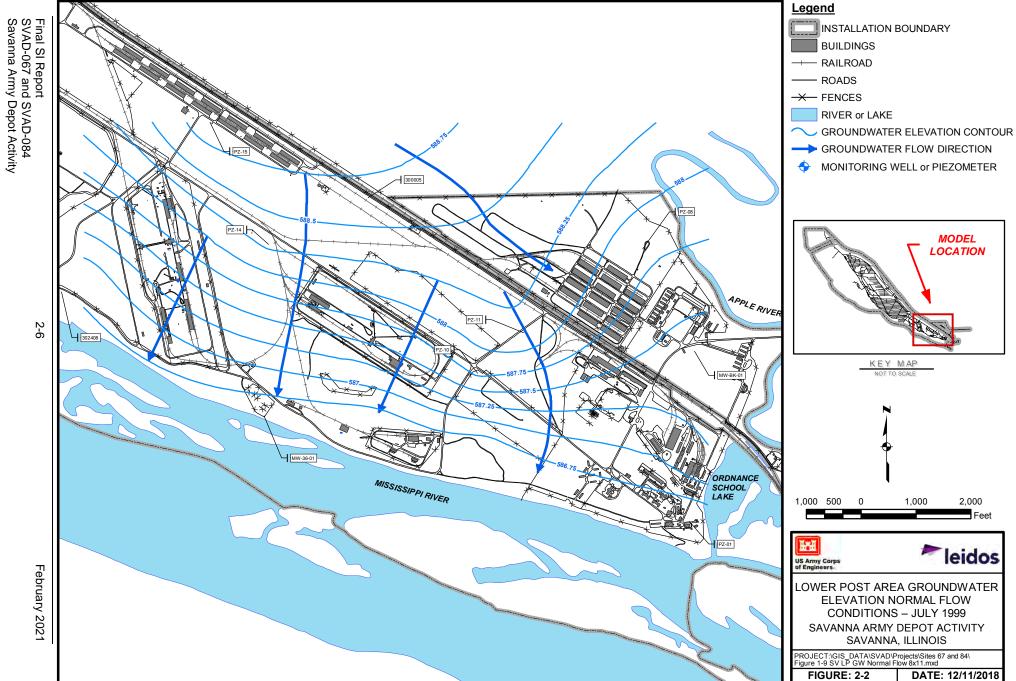
Apple Rivers. Bedrock ranges in elevation from 611 feet above msl in the northern portion of the Installation to 448 feet above msl in the southern portion. The bedrock surface forms an elongated trough extending northwest to southeast across SVDA from the Upper Post to the Lower Post (Dames & Moore 1994).

Alluvium and wind-blown sand aquifers underlying the Upper Post comprise the initial source of shallow groundwater. Hydrogeologic conditions in the shallow aquifer have been investigated through measurements of groundwater elevation in monitoring wells, aquifer tests, and assessment of groundwater flow direction. Hydraulic conductivity in the glacial aquifer underlying the Upper Post ranged from 5.9×10^{-4} to 1.2×10^{-1} cm/sec with a geometric average hydraulic conductivity of 1.52×10^{-2} cm/sec (Dames & Moore 1994) and the hydraulic conductivity in the overburden material on the Lower Post ranged from 1.6×10^{-4} to 9.4×10^{-2} cm/sec with a geometric average hydraulic conductivity of 1.93×10^{-2} cm/sec.

2.6.1 Geology/Hydrogeology at SVAD-067

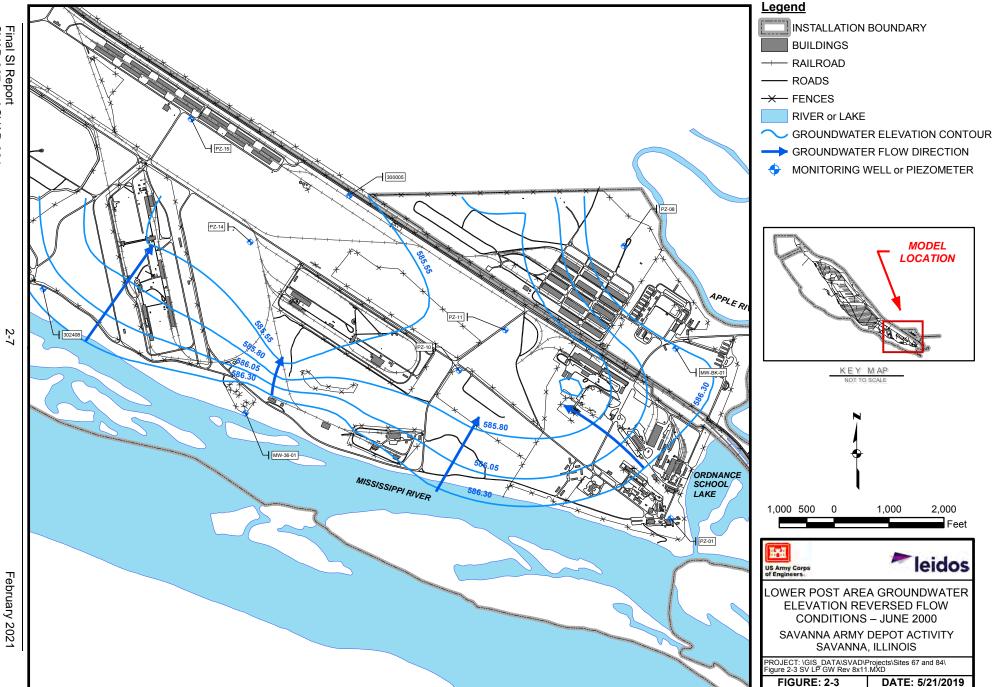
As documented in the final Lower Post Remedial Investigation (RI) (SAIC 2004), geologic and hydrogeologic conditions at SVAD-067 have been characterized using information obtained during monitoring well installations at the sites and information from previous investigations at adjacent sites on the Lower Post. Glacial geology underlying SVAD-067 consists of yellowish brown to reddish brown to brown fine- to medium-grained sand extending to a depth of 151 feet BLS. Bedrock was encountered beneath the site at monitoring wells MW-67-06 and 306706 and at the location of a deep pumping test boring at depths of 139.5 to 151 feet BLS (elevation 452 to 466 feet above msl, respectively). Groundwater underlying SVAD-067 occurs under unconfined conditions at depths ranging from 4.2 to 27.8 feet BLS with an average depth of 16.6 feet BLS from measurements obtained at monitoring wells between December 1998 and September 2003. Groundwater elevation measurements from December 1998 through September 2003 ranged from 580.49 to 593.04 feet above msl. Aquifer hydraulic conductivity (K) underlying the Lower Post ranges from 1.6×10^{-4} to 9.4×10^{-2} cm/sec with a geometric average hydraulic conductivity of 1.93×10^{-2} cm/sec based on 35 slug test results (Dames & Moore 1994). Hydraulic conductivity near SVAD-067 ranged from 3.5×10^{-4} to 8.5×10^{-2} cm/sec with a geometric average of 2.2×10^{-2} cm/sec. The results of a pumping test conducted west of SVAD-067 indicate horizontal aquifer hydraulic conductivity at 1.3×10^{-1} cm/sec.

The continuous groundwater monitoring on the Lower Post and Plant Areas over a 27-month period indicates that the groundwater flow in this area is predominantly directed toward the Mississippi River. Episodic rises in river stage in response to precipitation events temporarily reverse groundwater flow directions for short periods of time. Groundwater flow maps for the Lower Post and Plant Areas during periods of normal flow and reversed flow conditions are provided in Figures 2-2 and 2-3, respectively. Groundwater information collected from the new groundwater monitoring wells installed during the Leidos SI field activities are provided in Table 2-1. Although the groundwater information collected during the 2018 SI field activities indicated a relatively flat gradient through the site, the groundwater levels collected during the SI from the monitoring wells indicate the depth to shallow groundwater ranged from 11.52 feet BLS in MW-67PFAS-03 to 16.96 feet BLS in MW-67PFAS-02. Groundwater elevations were 591.29 feet above msl in MW-67PFAS-03 and 591.37 feet above msl in MW-67PFAS-01. The depths to groundwater and groundwater elevations were consistent with historical data.









2.6.2 Geology/Hydrogeology at SVAD-084

As documented in the Sites 46, 76CS, 84, and 184 RI Report (SAIC 2007), the geologic conditions underlying SVAD-084 have been characterized through drilling data obtained during the 2000 and 2003 investigations at the site. The soil at SVAD-084 is fine- to coarse-grained, moderately sorted, sub-rounded to well-rounded, loose sand with varying amounts of silt and gravel. The aquifer underlying the site consists of yellow-brown to brown, well- to poorly sorted, medium-grained sand that extends to bedrock at approximately 205 feet BLS (Dames & Moore 1994).

Groundwater monitoring wells had not been installed at SVAD-084 prior to this SI. Groundwater elevation in the vicinity of SVAD-084 was previously characterized through monitoring associated with adjacent SVAD-047 and SVAD-036 located 400 feet east and 300 feet south of SVAD-084, respectively. Groundwater level measurement was conducted at wells 303601, 303602, MW-36-01, MW-47-01, and MW-47-02 between October 2001 and September 2003 with groundwater elevation ranging from 582.93 to 587.21 feet above msl and an average elevation of 584.64 feet above msl. The depth to groundwater ranged from 41.52 to 65.34 feet BLS. Based on groundwater measurements in the wells surrounding SVAD-084, groundwater flow beneath the site is predominantly directed to the south and southwest toward the Mississippi River.

The continuous groundwater monitoring on the Lower Post and Plant Areas over a 27-month period indicates that the groundwater flow in this area is predominantly directed toward the Mississippi River. Episodic rises in river stage in response to precipitation events temporarily reverse groundwater flow directions for short periods of time. Groundwater flow maps for the Lower Post and Plant Areas during periods of normal flow and reversed flow conditions are provided in Figures 2-2 and 2-3, respectively. Groundwater information collected from the new groundwater monitoring wells installed during the 2018 SI field activities are provided in Table 2-3. Although the groundwater information collected during the 2018 SI field activities indicated a relatively flat gradient through the site, the groundwater elevation measurements confirmed a south-southeast flow of shallow groundwater at SVAD-084. Groundwater levels collected during the SI from the monitoring wells indicate the depth to shallow groundwater ranged from 39.28 feet BLS in MW-84PFAS-03 to 42.96 feet BLS in MW-84PFAS-01. Groundwater elevations were 589.17 feet above msl in MW-84PFAS-03 and 589.33 feet above msl in MW-84PFAS-01. The depths to groundwater and groundwater elevations were consistent with historical data.

			October 2018	
Monitoring Well	TOC Elevation (ft above msl)	Screened Interval	Depth to Water (ft BTOC)	Groundwater Elevation (ft above msl)
MW-67PFAS-01	607.46	11.43-21.48	16.09	591.37
MW-67PFAS-02	608.32	13.00-23.05	16.96	591.36
MW-67PFAS-03	602.81	14.15-24.20	11.52	591.29
MW-84PFAS-01	632.29	37.30-47.35	42.96	589.33
MW-84PFAS-02	631.94	38.96-49.01	42.54	589.40
MW-84PFAS-03	628.45	33.55-43.60	39.28	589.17

Table 2-3. 2018 SI Water Level Measurements Savanna Army Depot Activity, Savanna, Illinois

Note: TOC elevation and ground surface elevation data are from the monitoring well survey conducted in October 2018, by Central Illinois Consulting, Inc. (see Appendix C). Screened intervals shown in this table for the new wells were obtained from the well construction diagrams provided in Appendix B. Depth to water information was obtained from the groundwater sampling logs in Appendix B.

3. FIELD INVESTIGATION ACTIVITIES AND PROCEDURES

The principal guidance document for planning and implementing the SVAD-067 and SVAD-084 investigation includes the June 10, 2016, Department of the Army policy regarding perfluorinated compound contamination assessment (Department of the Army 2016) to determine the presence or absence of PFOS and PFOA in groundwater as a result of DoD activities. Subsequent to the establishment of the SVAD-067 and SVAD-084 investigation activities and procedures, the Army issued Guidance for Addressing Releases of PFAS (Department of the Army 2018). The investigation activities and procedures utilized for the SVAD-067 and SVAD-084 SI were consistent with the requirements presented in this Guidance.

The objectives of the DQO process were to define the problem at the sites, identify the necessary decisions, specify decision-making rules and the level of confidence necessary to resolve the problem, identify the number of samples necessary to support the decision, and obtain agreement from the decision makers (i.e., the BRAC Cleanup Team [BCT]) before the sampling program was initiated. The SVAD-067 and SVAD-084 sampling points were determined by locating sampling points in the areas with the highest potential for identifying COCs or at known release points. The BCT concurred that selected sampling schemes would be representative of site conditions prior to initiation of field investigation activities (Leidos 2018a). The field investigations at SVAD-067 and SVAD-084 were conducted in accordance with UFP-QAPP Addendum 2 (Leidos 2018a) and HASP Addendum 2 (Leidos 2018b).

Fire training activities at SVAD-067 and SVAD-084 were determined to have utilized AFFF based on historical records reviews (SAIC 1999a) and recent interviews with the former SVDA Fire Chief. The former SVDA Fire Chief was a firefighter during the 1960s and 1970s and was the SVDA Fire Chief from 1987 to 1995. The former SVDA Fire Chief indicated that FTA activities at SVAD-067 utilized AFFF mixed with water. The former SVDA Fire Chief noted that FTA activities at SVAD-084 were conducted with water and 3M Light Water. 3M Light Water was the brand name for a firefighting foam manufactured by 3M that contained PFOS. Consequently, the groundwater at SVAD-067 and SVAD-084 was evaluated to determine the presence or absence of PFOS and PFOA at concentrations exceeding the USEPA LHA and tap water screening levels (ASD 2019) as a result of DoD activities.

3.1 FIELD INVESTIGATION ACTIVITIES

Under this SI, sampling activities at SVAD-067 and SVAD-084 included installing three permanent groundwater monitoring wells at each site and conducting one round of groundwater sampling. Samples were analyzed for the six UCMR3 PFAS compounds to determine the presence or absence of PFAS in groundwater. The groundwater samples were collected at and downgradient from the source areas at SVAD-067 and SVAD-084 and analyzed in accordance with USEPA protocols for PFAS investigations and respective laboratory reporting requirements.

3.2 FIELD PROCEDURES

The following sections describe the field procedures for sampling, sample handling and custody, decontamination, and investigation-derived waste (IDW) handling used during the SI field activities at SVAD-067 and SVAD-084.

3.2.1 Field Sampling Methods

The following sections describe the field inspection, munitions and explosives of concern (MEC) clearance, and sampling methods used during the SI field activities at SVAD-067 and SVAD-084. The SI sampling locations were selected during the work plan development. The sampling locations were based on potential PFAS release areas, as well as upgradient of and downgradient from the potential release areas.

The purpose of the SI sampling was to determine the presence or absence of PFOS and PFOA constituents at concentrations exceeding the USEPA LHA established in the work plan (Leidos 2018a) and the tap water RSLs (ASD 2019).

Because many materials routinely used in the course of environmental investigation can potentially contain PFAS, the field crew conducted the groundwater monitoring well installation and sample collection in accordance with the PFAS sampling standard operating procedure (SOP) included in the UFP-QAPP Addendum 2 (Leidos 2018a) and HASP Addendum 2 (Leidos 2018b).

3.2.1.1 Visual Inspections

A visual inspection was conducted at the SVAD-067 and SVAD-084 areas prior to initiating drilling activities for monitoring well installation. During this visual inspection, site characteristics, including topography, surface water drainage patterns, buildings and structures (e.g., location or potential release pathways), visible surface stains, damaged concrete or structures, stressed vegetation, exposed soil, and utility locations, were evaluated prior to locating intrusive sampling points.

3.2.1.2 Utilities Clearance

Prior to initiating any intrusive activities during the fieldwork, the investigation area was cleared of underground utilities by state, facility, and Leidos personnel. During the mobilization stage, pre-determined sample locations were provided to the Illinois Joint Utility Locating Information for Excavators (JULIE) organization (i.e., the Illinois One-Call System), who later marked the area for underground public utilities (e.g., electricity, telephone, fiber optic, water, gas) based on the quarter section number. Consistent with State of Illinois requirements, contact with JULIE and acquisition of the necessary clearance was completed by the firm actually performing the intrusive work (in this case both Leidos and Mateco Drilling).

As-built underground utility maps also were provided by SVDA representatives and reviewed by Leidos personnel prior to intrusive work to verify the location of utilities. Once onsite, Leidos sampling personnel used best professional judgment to verify that there was no obvious evidence of utilities in the sampling area.

3.2.1.3 MEC Avoidance

Prior to initiating intrusive activities, the investigation areas were verified to be free of MEC, material potentially presenting an explosive hazard (MPPEH), or other metallic objects by a Leidos unexploded ordnance (UXO) technician. This individual cleared all proposed monitoring well locations using a Schonstedt[®] GA-52CX magnetometer, first at the surface and then incrementally with depth as necessary. No metallic anomalies were detected at SVAD-067 and SVAD-084.

3.2.1.4 Groundwater Monitoring Well Installation

Groundwater monitoring well installation was conducted in accordance with the SOPs provided on Worksheet #21a and Appendix C of the UFP-QAPP Addendum 2 (Leidos 2018a). Specific construction parameters, such as the exact depth of screen settings, were determined in the field based on information obtained during the well drilling process (e.g., depth to water). All new monitoring wells were installed using hollow-stem auger drilling. The new monitoring wells were constructed of Schedule 40, 2-inch diameter, flush-threaded, polyvinyl chloride (PVC) riser and 0.010-inch slotted screen. The screens were installed to extend approximately 7 feet below the top of the water table. All wells installed during the investigation were constructed with 10-foot screens. Table 3-1 provides monitoring well construction details. Well construction logs are provided in Appendix B.

Monitoring Well	Top of Casing Elevation (ft above msl)	Ground Elevation (ft above msl)	Screened Interval (ft BGS)	Total Well Depth (ft BTOC)	Well Diameter (in)	Casing
SVAD-067						
MW-67PFAS-01	607.46	605.08	11.43-21.48	23	2	PVC
MW-67PFAS-02	608.32	605.95	13.00-23.05	23.3	2	PVC
MW-67PFAS-03	602.81	600.73	14.15-24.20	27.6	2	PVC
SVAD-084						
MW-84PFAS-01	632.29	630.13	37.30-47.35	48	2	PVC
MW-84PFAS-02	631.94	629.78	38.96-49.01	49.3	2	PVC
MW-84PFAS-03	628.45	626.13	33.55-43.60	48	2	PVC

 Table 3-1. Monitoring Well Construction Information

 Savanna Army Depot Activity, Savanna, Illinois

Note: TOC elevation and ground surface elevation data are from the monitoring well survey conducted in October 2018, by Central Illinois Consulting, Inc. (see Appendix C). Screened intervals shown in this table for the new wells were obtained from the well construction diagrams provided in Appendix B. Depth to water information was obtained from the groundwater sampling logs in Appendix B.

Following advancement of the augers to the target depth, well installation activities began with the placement of the well screen and casing into the augers. After the well screen and casing were placed into the augers, the granular filter pack was placed into the annulus between the well (i.e., well screen and casing) and the hollow-stem augers. The augers were incrementally removed from the borehole as the sand was poured to the desired height. The filter pack consisted of IES Drilling Supplies, Inc. (10/20) silica, manufactured for this purpose. Granular filter pack was added until the sand was approximately 2 to 3 feet above the top of the screen. The Leidos geologist measured the final depth to the top of the granular filter pack using a weighted tape. The data were recorded on the monitoring well construction forms and recorded in the field logbook.

After the well screen was in place and the sand pack had been installed, at least 1 foot of Black Hills Bentonite, 3/8-inch bentonite chips were placed inside the augers, over the sand pack, and hydrated with approximately 5 to 10 gallons of potable water. The potable water used for hydration and decontamination activities was sampled during the event. The potable water was analyzed prior to use, and analytical results are presented in Appendix E. The Leidos geologist measured the top of the bentonite using the weighted tape. The data were recorded on the monitoring well construction form and in the field logbook and preparation was made to initiate grouting.

Grout consisting of Type I Portland cement, Baroid Quick-Gel High Yield bentonite powder, and potable water was mixed and emplaced via tremmie pipe through the hollow-stem augers, over the bentonite seal. After the grout was brought to the ground surface, the remaining hollow-stem augers were removed from the borehole and a steel protective casing was placed over the well and suspended into the grout. As needed, additional grout was placed in the borehole to bring the level back to the ground surface.

The construction of each well was completed by filling the annulus between the well casing and the protective casing with mortar to a height above the eventual top of the well pads. Well pads were formed by pouring concrete within 3- by 3-foot square, 5 $\frac{1}{2}$ -inch-tall wooden forms centered around the protective casing. Following pad placement, weep holes were drilled into the protective casing, directly above the height of the mortar collar. Four, 6-foot-tall, steel protective posts (bollards) were driven approximately 2 feet below the ground surface, at each corner of each well pad, filled with sand, and capped with concrete. Each protective casing and all posts were primed and then painted safety-orange. Well identification (I.D.) numbers were stenciled onto each protective casing using a paint pen. Keyed-alike locks were placed on each protective casing.

Borehole cuttings, decontamination fluids and solids, and groundwater removed during development and pre-sample purging were containerized and disposed of as IDW. Information pertaining to the handling of IDW is contained in Section 3.5.

3.2.1.5 Groundwater Monitoring Well Development and Sampling

Each new monitoring well was developed in accordance with the UFP-QAPP Addendum 2 (Leidos 2018a). Development was completed by first bailing and surging the wells using new, disposable, polyethylene bailers and cotton, PFAS-free rope. Bailing was conducted to remove any gross accumulation of sediment. Following bailing, the wells were pumped using (PFAS-free) Monsoon submersible pumps equipped with new polyethylene tubing. Wells were first pumped at the highest possible rate to continue removal of gross sediment. During the removal of the first well volumes, the pump was raised and lowered throughout the screened interval and turned on and off several times to provide additional surging action. After the groundwater turbidity began clearing, the pump was set at the approximate mid-point of the water column and pumping was continued until water quality parameters stabilized. Development was considered complete after a minimum of 5 volumes were removed, pH readings were within 0.1 standard units, conductivity was +/- 10 mS/cm, and temperature was within 0.5°F in three consecutive readings. In addition, development was continued until the water appeared clear. At each well, turbidity was reduced to readings of 10 Nephelometric Turbidity Units (NTUs) or less. Tens of well volumes were removed from each well.

All groundwater samples were collected in accordance with the procedures outlined in the following sections. QC samples, including potable and deionized (DI) source water blanks, a reagent blank, one duplicate, and one matrix spike/matrix spike duplicate (MS/MSD) also were collected. The potable water source blank and the reagent blank were collected in Trizma-preserved containers.

Monitoring Well Purging and Groundwater Sampling-Each new monitoring well was purged before sampling. Purging was conducted using the low-flow methods described in SOP field procedure (FP) 5-6A, which is provided in Appendix D of the Data Collection Quality Assurance Plan (DCQAP) (SAIC 1999b). The purpose of the low-flow purging and sampling procedure was to obtain groundwater samples that are representative of the source from which they are collected and to minimize sampler exposure to groundwater contaminants. To be useful and accurate, the groundwater sample must be representative of the particular saturated zone of the substrate being sampled. The physical, chemical, and bacteriological integrity of the sample must be maintained from the time of sampling to the time of testing in order to keep any changes in water quality parameters to a minimum. Each well was purged at a rate of 1 liter per minute or less depending on the rate of recharge so as not to lower the water level within the well. During purging, pH, specific conductance, turbidity, dissolved oxygen, oxidation-reduction potential, and temperature were measured from purged water, using the instruments described in Section 4.14 of the DCQAP (SAIC 1999b). Purging was considered complete when all parameters stabilized for three successive readings and turbidity was lowered to below 10 NTUs. Section 8 of SOP FP 5-6A, which is provided in Appendix D of the DCQAP (SAIC 1999b), details the minimum criteria for stabilization of purge water.

Following the completion of purging, samples were collected without pause in pumping, directly from the discharge tubing (not from the discharge of the flow-through cell). Samples were collected in laboratory-supplied, certified-clean, plastic containers. Monitoring well development and sampling logs are presented in Appendix B.

3.2.1.6 Topographic Surveying

The monitoring well locations were predetermined during work plan development. These locations were preloaded into the differential global positioning system (DGPS) unit with sub-meter accuracy. Once in the field, the DGPS unit with sub-meter accuracy was used to navigate to the predetermined locations,

which were then marked with a wooden stake and visible flagging for easy recognition by sampling personnel. Following sampling, the actual locations (i.e., horizontal coordinates) and ground and top of casing elevations of each monitoring well were surveyed by a licensed surveyor (Central Illinois Consulting, Inc.). Survey coordinates are provided in Appendix C.

3.3 SAMPLE IDENTIFICATION AND FIELD CUSTODY PROCEDURES

The sample I.D. system discussed in UFP-QAPP Addendum 2 (Leidos 2018a) was used to uniquely identify each environmental and field QC sample obtained during the SI. This system allowed information about each sample or sample location to be easily and accurately tracked from collection to reporting and ensured unique sample nomenclature. The first two letters in the sample I.D. number represent the sample type (e.g., MW for monitoring well). The next two numbers designate the site. Each site designation was appended with 'PFAS' to distinguish the sample location from previous monitoring wells installed at the sites. The last two digits represent the individual location number (e.g., "03" for well 003). In addition, samples also include a field sample number. The field sample number is a unique, sequential designation assigned to each environmental sample and field QC sample collected. It is an alphanumeric code that indicates the sequential sample number for a corresponding sample I.D. number. A complete example of the format for a typical sample name is as follows:

Sample I.D.	Sample Description
MW-67PFAS-03- LDOS01	Monitoring Well (MW) at SVAD-067 for PFAS investigation (67PFAS) sample location number 3, first sample collected by Leidos (LDOS01)

Duplicate and Field QC Blanks—The following QC test and flagging codes were used to identify duplicate environmental and field QC blank samples:

- "D" entered in the flagging code field was used to identify all field duplicates collected in the field
- "R" entered in the QC test code field was used to identify all equipment rinsate blanks collected in the field
- "N" and "ND" entered in the flagging code field was used to identify all MS and MSDs in the field.

Sample labels were completed at the time of sampling and were attached to each container. The label was completed in indelible ink and contained the following information:

- Date and time sample collected
- Media type
- Site I.D. and field sample number
- Depth
- Preservative used (if any)
- Initials of sample collector.

Procedures for transporting environmental samples and field QC samples from SVDA to the laboratory are summarized below:

- Sample collection points, depth increments, and sampling devices documented in the field logbooks were verified with the information written on the sample label and chain-of-custody (CoC) form.
- Logbook entries, field record sheets, and CoCs with sample identification, locations, date, time, and names or initials of all persons handling the sample in the field were completed.

- Samples were placed into re-sealable plastic bags.
- Samples were packaged in thermally insulated, rigid coolers along with ice and coolant blanks. After a cooler was filled, the completed CoC form was placed inside a re-sealable plastic bag and taped to the inside lid of the cooler
- Custody seals were attached in two separate locations on the outside of each cooler.

All samples were kept on ice in a cooler after sample collection. Sample preparation and packaging was completed at the end of each day that samples were collected. Sample coolers were shipped to the analytical laboratory by overnight delivery.

3.4 DECONTAMINATION PROCEDURES

All nondisposable sampling equipment (e.g., pumps, pump cords, flow cell) that came in contact with groundwater were decontaminated prior to and after each use. The purpose of decontamination was to prevent the introduction of extraneous material or chemicals into the samples and to prevent cross-contamination between samples. Decontamination of field equipment was conducted in accordance with SOP field technical procedure (FTP)-400, which is provided in Appendix C of the UFP-QAPP Addendum 2 (Leidos 2018a).

The decontamination process included an initial scrub with DI water and a laboratory-grade, phosphate-free, biodegradable detergent (e.g., Liquinox[®]) to remove particulate matter and surface film. Following this scrub, the equipment was then rinsed twice in separate bins containing DI water Decontaminated sampling equipment was kept in the final decontamination bin to prevent recontamination during down time or transit.

Drilling equipment was decontaminated by steam cleaning, using water from a source sampled during the investigation. All equipment, including augers, rods, tools, and measuring tapes, were decontaminated before and after each use. Decontamination activities were conducted within an established area that used a trough to primarily collect decontamination wastewater and which was underlain by bermed plastic sheeting to collect overspray.

Rinse water generated during the decontamination process was containerized as liquid IDW. This material was first placed in temporary storage containers (e.g., 5-gallon buckets or carboys) before being ultimately transferred into 55-gallon drums for storage, transport, and disposal. Solids generated from decontamination of drilling equipment were contained in 55-gallon drums, which also were used to contain drill cuttings.

DI water used in each rinse was provided by the analytical laboratory and certified clean. DI water used in the decontamination process was sampled and analyzed for the same COCs as the primary environmental samples (i.e., PFAS).

3.5 DISPOSITION OF FIELD INVESTIGATION-DERIVED WASTE

The IDW generated during the SI at SVAD-067 and SVAD-084 included soil (solid), development and purged groundwater, and decontamination rinse water (liquid). These materials were managed in accordance with the specific IDW Management Plans provided in the DCQAP (SAIC 1999b).

All IDW generated at SVAD-067 and SVAD-084 was ultimately placed in United Nations (UN)-approved, 55-gallon drums for storage, transport, and disposal, although this material may have been stored transiently in other containers (e.g., 5-gallon buckets or carboys) when small volumes were generated. All containers used to hold any amount of IDW (including intermediate containers) were properly labeled as soon as they were filled according to applicable Leidos procedures and Occupational Safety and Health Administration (OSHA) regulations. Permanent labels for the drums included a unique

container number, a description of the contents (i.e., soil or wastewater), the fill date, the source location (i.e., SVAD-067 or SVAD-084), the generator's name (i.e., SVDA), and a telephone number for the generator's point of contact (i.e., the SVDA BRAC Environmental Coordinator [BEC]). Each bucket or carboy used to temporarily store liquid IDW before it was transferred to a 55-gallon drum was marked "Nonpotable Water" or "Decontamination Waste" to comply with Leidos and OSHA hazard communication standards.

The contents of the IDW drums were sampled for characterization. A waste soil sample was collected during drilling by collecting aliquots from each 5-foot interval of each boring and combining and homogenizing them in a zip-seal bag to form a composite. For drums containing liquid IDW (i.e., wastewater), a composite sample was collected by extracting contents through the bung hole of each drum using a disposable bailer. The waste hauler (Veolia) was contacted prior to sampling to determine parameters required for disposal of waste potentially containing PFOS/PFOA. Veolia advised Leidos to analyze for suspected contaminants based on site history and previous investigations. It was determined that toxicity characteristic leaching procedure (TCLP) pesticides and TCLP, herbicides would be of no concern and the potential did exist for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs) and metals. Therefore, both solid IDW and liquid IDW were analyzed for TCLP VOCs, TCLP SVOCs, and TCLP metals. In addition, Veolia required the analysis of polychlorinated biphenyls (PCBs), pH, flashpoint, cyanide, sulfide, and paint filter test (solid IDW only). Results were then used to determine proper waste disposal.

No IDW from SVAD-067 or SVAD-084 was characterized as hazardous. Containerized waste was disposed of in accordance with applicable state and Federal Resource Conservation and Recovery Act (RCRA) regulations. The licensed and certified waste hauler (Veolia) removed the drums containing IDW waste from SVDA for disposal on April 18, 2019. The drums containing IDW were disposed of at Covanta Environmental Solution (5625 Old Porter Road, Portage, Indiana 46368). Soiled personal protective equipment (PPE) was bagged and disposed of as municipal waste.

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4. LABORATORY CHEMICAL ANALYSIS PROGRAM AND QUALITY ASSURANCE SUMMARY

This section summarizes the laboratory chemical analysis program implemented as part of the SVAD-067 and SVAD-084 field investigations conducted in October 2018 at SVDA. Sections 4.1 through 4.5 summarize sample handling procedures, equipment calibration, analytical methods, data reporting and validation, and sample QA/QC. Additional information on these guidelines is presented in the UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018a), which was followed during the laboratory chemical analysis program. Test America, located in Arvada, Colorado, was the analytical laboratory under contract for the analysis of PFAS and Eurofins, located in Lancaster, Pennsylvania, was the split QC analytical laboratory for PFAS during the SVAD-067 and SVAD-084 field investigations.

A QA summary of the analytical data is presented in Section 4.6. Appendix D provides additional information on the QA assessment. Appendix D (Table D-1) summarizes the groundwater samples collected for PFAS analysis, in addition to the field QC samples collected and selected laboratory QC (i.e., MS/MSDs and laboratory duplicates) samples.

4.1 SAMPLE HANDLING PROCEDURES

A critical aspect of sample collection and analysis protocols is the maintenance of strict CoC procedures, which include tracking and documentation during sample collection, shipment, and laboratory processing. The Sample Manager was responsible for sample custody until the samples were properly packaged, documented, and released to FedEx. The laboratory was responsible for sample custody thereafter in accordance with approved procedures.

4.1.1 Establishment of Sample Delivery Groups

All samples collected at SVAD-067 and SVAD-084 were reported by sample delivery groups (SDGs) at the analytical laboratory. Analytical batch size is determined as the maximum number of samples up to 20, including QC samples, which can be analyzed using the most time-consuming activity in the analysis, which frequently is the extraction or digestion process. Analysis of samples within an SDG was as continuous as possible. All samples were processed as defined in USEPA Method 537 Version 1.1 (USEPA 2009), the DoD QSM Version 5.1 (DoD 2017), and the laboratory SOP.

4.1.2 Laboratory Sample Receipt

All samples received by the Laboratory Sample Custodian or designee were checked for proper preservation (e.g., pH, temperature of coolant blank above 2°C or below 6°C); integrity (e.g., leaking, broken bottles); and proper, complete, and accurate documentation and ID of the samples. The temperature of the coolant blank was noted. No insufficiencies and/or discrepancies were noted.

Samples received at the laboratory were logged into the laboratory computer database. Initial entries included field sample number, date of receipt, and analyses required. As samples were received, they were assigned a laboratory sample ID number. The sample custodian labeled each container with its sample ID number, and the samples then were transferred to their designated storage areas.

4.1.3 Chain-of-Custody Record

CoC forms were used to document the traceability and integrity of all samples from the point of collection to the laboratory by maintaining a record of sample collection, transfer between personnel, shipment, and receipt by the laboratory. A CoC form was filled out and was signed and dated by each sample custodian.

Shipping containers were sealed with custody tape. Sealed coolers were transported to Federal Express for overnight delivery to the laboratory. The air bill number, written on the CoC form, acted as the custody documentation while the coolers were in the possession of Federal Express. The CoC form was placed in a resealable plastic bag and taped to the inside lid of the cooler.

When the possession of samples was transferred, the individual relinquishing the samples and the individual receiving the samples signed, dated, and noted the time of transferal on the CoC document. This record represents the official documentation for all transferal of sample custody until the samples arrived at the laboratory.

Samples received by the laboratory were considered to be physical evidence and were handled according to USEPA procedural safeguards. In addition, all data generated from the sample analyses, including all associated calibrations, method blanks, and other supporting QC analyses, were identified with the project number, and SDG designation. All data were maintained under the proper custody. The laboratory provided complete security for samples, analyses, and data.

4.2 LABORATORY ANALYTICAL METHODS

The chemical analysis program for SVAD-067 and SVAD-084 field investigations conforms to the analytical requirements presented in the UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018a) for the chemical analysis of groundwater samples. All samples were analyzed for PFAS using modified USEPA Method 537 Version 1.1 (USEPA 2009), the DoD QSM Version 5.1, and the laboratory SOP during the October 2018 sampling event.

4.3 LABORATORY EQUIPMENT CALIBRATION

To ensure that daily variances had not adversely affected the operation of each instrument, a series of calibration standards was analyzed according to specific methodologies before any samples were analyzed. The laboratories satisfied all calibration requirements, as stated in USEPA Method 537 Version 1.1 (USEPA 2009). All calibration requirements were met for these methods with the exceptions summarized in Section 4.6.2 and Appendix D. The UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018a) contain the laboratory-specific method SOPs and calibration procedures specific to each analytical method.

4.4 DATA REPORTING AND VALIDATION

The Leidos QA Manager or designee initiated a validation of the analytical data packages. One hundred percent of the data were validated using the USEPA Contract Laboratory Program (CLP) *National Functional Guidelines for Organic Data Review* (USEPA 1999), modified to accommodate the DoD QSM, Version 5.1 (DoD 2017), and Louisville QSM Supplement (USACE 2002) criteria. The *National Functional Guidelines for Organic Data Review* (USEPA 1999) was used to validate the data.

During the data validation, a modified USEPA CLP National Functional Guidelines validation occurred. As such, CLP Forms 1 through 14 were reviewed to ensure that the QC results fell within appropriate QC limits for holding times, blank contamination, internal standards (ISs), surrogate recoveries, calibrations, MS/MSDs, laboratory control samples (LCSs), cleanup checks, detection limits (DLs), and any other required QC data. Laboratory QC forms were reviewed to ensure that the QC results fell within the appropriate QC limits. Any resulting data validation qualifiers were applied and a data validation report, as previously described, was prepared.

In addition, 10 percent of the data were recalculated by a third-party validator from the raw data to verify that the algorithms were used and that data transcription was correct. Analytical results were checked and recalculated from raw data. If a significant problem was found in any analytical protocol or matrix type

(e.g., consistent failure to meet calibration requirements or poor spike recoveries), 100 percent of the data generated by that particular method were fully validated to determine if a serious systemic problem exists in the data set. No problems were encountered by the third-party validator during calculation verification.

Individual reagent blanks, equipment rinse blanks, and field blanks were associated with the corresponding environmental samples. These field blanks were evaluated following the same criteria as method blanks, and the associated environmental samples were appropriately qualified. After all of the data validation for the project was completed, a project DQA was prepared (see Appendix D).

4.5 SAMPLE DATA QUALITY ASSURANCE/QUALITY CONTROL

This section presents the QA/QC procedures applied during the laboratory analysis and field investigation. This discussion includes laboratory QA/QC procedures (Section 4.5.1) and field QA/QC (Section 4.5.2). Details on the results of the QC samples (field and laboratory) are presented in the DQA included as Appendix D.

4.5.1 Laboratory Quality Assurance/Quality Control

The most current versions of the USEPA method requirements were followed for all samples collected. Samples were analyzed for PFAS. The method requirements pertain to holding times, method blanks, calibration standards, ISs, surrogate standards, LCSs, MS/MSDs, and DLs. The acceptance criteria and method SOPs are provided in the UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018a).

Method Blanks—Method blanks were used to monitor the possibility of laboratory-induced contamination by running a volume of approved reagent water through the entire analytical scheme (i.e., digestion, extraction, concentration, analysis). USEPA blank requirements are specified in the respective statements of work (SOWs) and the analytical method.

Matrix Spike/Matrix Spike Duplicates—MS/MSDs were analyzed on water samples to evaluate the accuracy and precision of the analysis and matrix effect of the sample on the analytical methodology. This evaluation was accomplished by analyzing three sample aliquots of equal weight. One aliquot was analyzed routinely. A known amount of selected compounds at known concentrations was added to each of the two remaining sample aliquots. The spiked samples and unspiked samples were analyzed in the same manner. Accuracy was expressed as the percent recovery (%R) of each added compound. Precision was expressed as the relative percent difference (RPD) of MS and MSD compounds. A pair of MS/MSD samples was analyzed for every 20 samples of similar matrix received at the laboratory and analyzed by USEPA methods.

Laboratory Control Samples—LCSs were analyzed to evaluate the accuracy of the analysis and matrix effect of the sample on the analytical methodology. A known amount of selected compounds at known concentrations was added to the LCS. The spiked samples were analyzed in the same manner as the environmental samples. Accuracy was expressed as the %R of each added compound. An LCS was analyzed with each SDG.

4.5.2 Field Quality Assurance/Quality Control

Table 4-1 summarizes the frequency of field QC samples that were collected during this investigation. A discussion of field QC is presented on Worksheet #20 of the UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018a).

QC Sample	Water
Field Blank	1 per DI water
	1 per tap water
Equipment Rinsate Blank	1 for every 10 or fewer investigative samples
Field Duplicate	1 for every 10 or fewer investigative samples
Reagent Blank	1 per sampling event

Table 4-1. Frequency of Field QC Samples for SVDA-067 and SVAD-084 Field Investigations Savanna Army Depot Activity, Savanna, Illinois

4.5.3 Quality Assurance Split Sample Analysis

One field sample was split from the primary samples and sent to a third-party independent laboratory referred to as the QA laboratory. The QA laboratory for the SVAD-067 and SVAD-084 SI was Eurofins of Lancaster, Pennsylvania. The analysis of QA split samples provides an overall measure of field and laboratory accuracy and precision. Primary and QA laboratory data were assessed using guidelines provided in the Louisville QSM Supplement (USACE 2007). Appendix D, Table D-4 provides a comparison of the primary and QA split results.

Sample results that were detected above the reporting limit by both the primary laboratory and the QA laboratory were all in good agreement according to Louisville QSM Supplement guidelines (USACE 2007). No sample results were in disagreement. The reproducibility between the primary and QA split sample are considered acceptable. A full discussion is included in Appendix D.

4.5.4 Third-Party Data Validation

Third-party full data validation was required on 10 percent of the SVAD-067 and SVAD-084 sample results. Third-party data validation was performed by EcoChem, Inc. of Seattle, Washington. Full validation consisted of validating the data using the QC data reported by the laboratory against required precision and accuracy limits established in the DoD QSM (2017) and against QC requirements outlined in the Louisville QSM Supplement (USACE 2007), UFP-QAPP (Leidos 2014), and UFP-QAPP Addendum 2 (Leidos 2018a).

Appendix D, Table D-5 provides a comparison of Leidos data verification applied qualifiers and EcoChem's data validation applied qualifiers. Some discrepancies existed due to differences in professional judgment used during the verification or validation process as well as fundamental differences between the verification process and the validation process (i.e., the verification process does not involve examining raw data and the validation process requires examining and recalculating raw data). A full discussion is included in Appendix D.

Overall, the differences between the Leidos verification qualifiers and the Ecochem validation qualifiers have no impact on the final usability of the data. In instances where the discrepancies were based on professional judgment or where EcoChem's validation protocol differed from the DoD QSM (DoD 2017) protocol or the UFP-QAPP (Leidos 2014) and/or UFP-QAPP Addendum 2 (Leidos 2018a), no changes were made to Leidos-applied qualifiers.

4.6 QUALITY ASSURANCE SUMMARY

This section summarizes the results of the DQA conducted for the analytical data resulting from this investigation. A comparison of the analytical results to project DQOs, as defined in the UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018a), formed the basis for evaluating the quality of the analytical data. Data verification and validation were conducted on 100 percent of the resulting

analytical data packages to ensure that the laboratory produced an acceptable quality level for results. One hundred percent of the data were evaluated for contamination due to field activities by evaluating all field QC blanks (i.e., reagent blank, equipment rinsate blanks, field blanks).

The following sections summarize the DQOs for the precision, accuracy, representativeness, comparability, and completeness (PARCC) and sensitivity parameters obtained during the SVAD-067 and SVAD-084 SI. A detailed project DQA is presented in Appendix D. A summary of the samples collected, the parameters of interest, and the related field QC samples (i.e., reagent blank, equipment rinsate blanks, field blanks) are presented in Appendix D, Table D-1. All data validation qualifiers applied to the data are presented in Appendix D, Table D-2.

4.6.1 Precision

Precision was evaluated based on the analysis of two different types of QC samples: MS/MSDs and field duplicate samples.

The first type of QC sample used to assess the precision of the data quality was the RPDs of the MS/MSDs. All MS/MSD RPDs were within the control limits specified on Worksheet #12 of the UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018a).

The second type of QC sample used to monitor field precision was field duplicate samples. Duplicate sample pairs were collected to ascertain the contribution of variability (i.e., precision) due to environmental media and sampling precision techniques. Field duplicate RPDs were reviewed to identify any percentages that were suspicious. Data have not been qualified based on the results of field duplicates, since the USEPA *CLP National Functional Guidelines for Organic Data Review* (USEPA 1999) do not include control limits for field duplicate RPDs. No specific control limits for field duplicates were established in part because the natural heterogeneity of the environmental media was much greater than the variability imparted by field and laboratory activities. Although data were not qualified due to field duplicate RPDs, field duplicate RPDs were calculated and compared to the maximum RPD limit of 30 percent or an absolute difference of three times the sample-specific limit of quantitation (LOQ) when the results are less than five times the sample-specific LOQ, as specified in the UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018a) for all field duplicates collected and listed in Appendix D, Table D-1 (field duplicate sample IDs end in a "D"). In instances where both the primary and field duplicate result were nondetect, the RPD was not calculated. Calculated RPDs are provided in Appendix D, Table D-3. Field duplicate comparisons were acceptable, as discussed in Appendix D.

As a result, the laboratory DQO for precision has been fulfilled. A comprehensive discussion of MS/MSD and duplicate results is presented in Appendix D.

4.6.2 Accuracy

Analytical accuracy is defined in the UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018a) and measured through the use of LCS %Rs, MS/MSD %Rs, ISs, surrogate recoveries, initial and continuing instrument calibration, calibration blanks, method blanks, and field QC blanks (i.e., reagent blanks, field blanks, equipment rinsates).

MS/MSD recoveries above the upper control limit (UCL) indicate a potential high bias in the corresponding native sample detects. MS/MSD recoveries below the lower control limit (LCL) indicate a potential low bias in the corresponding native sample nondetects and detects. Nondetected organic sample results were qualified as rejected (R) if the associated recoveries were below 10 percent. All MS/MSD results were within control limits and no results were qualified.

The LCS was the second QC type used to assess analytical accuracy. Based on an evaluation of the data, criteria were within the control limits specified in the UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018a). No data were qualified due to LCS results.

The QC method used to assess the accuracy of the data was the surrogate percent recoveries for PFAS. Sample results were qualified as estimated (J/UJ) if the associated surrogates were below the LCL. Detected PFAS sample results were qualified as estimated (J) if the associated surrogates were above the UCL. Nondetected PFAS sample results were qualified as rejected (R) if the associated surrogates were below 10 percent. All surrogates were within control limits and no data were qualified.

ISs were added in all calibration standards, environmental samples, and QC blanks in accordance with USEPA Method 537 rev 1.1 for PFAS. IS results above retention time and/or above percent area recoveries are qualified as estimated (J) for associated analytes. IS results below retention time and/or below \pm 50 percent area recoveries but above 25 percent are qualified as estimated (J/UJ) for associated analytes. No ISs were below +25 percent and no data were rejected. Sample results qualified due to IS performance are summarized in Appendix D, Table D-2 with reason code K01.

All supporting QC information cited above also was qualitatively evaluated with respect to the analytical accuracy DQO. Based on the evaluation of the MS/MSD and LCS results and the associated laboratory QC results summarized in Appendix D, the laboratory accuracy was determined to be acceptable for all analyses. The analytical DQO for accuracy has been met, except where noted.

Method blank analysis was conducted with each analytical batch of environmental samples analyzed, and the results evaluated for interferents that might potentially interfere with accurate quantitation of a target compound. No results were qualified due to method blank contamination.

Initial calibration blanks (ICBs) and continuing calibration blanks (CCBs) were analyzed with each batch of PFAS analyses. Any analyte detected in the ICBs and/or CCBs were below the allowable levels as defined by the analytical method. Appendix D, Table D-2 lists the sample results that were qualified due to ICB/CCB contamination with reason code F06.

Field blanks (i.e., reagent blanks, equipment rinsate blanks and field blanks [i.e., source tap water and source DI water used in the equipment decontamination process]) were collected to determine the degree of cross-contamination or ensure successful decontamination procedures. The data validation qualifier "U" was applied to field sample detections at concentrations below the action level in the associated equipment blank. No sample results were qualified based on field blank contamination.

Results were qualified as estimated (J) when the associated with continuing calibration verification (CCV) recoveries were above the UCL. Results were qualified as estimated (J/UJ) when the associated CCV recoveries are below the LCL. Data points qualified as "UJ" or "J" are considered to be acceptable, but estimates. No results were qualified based on CCV discrepancies.

Based on an evaluation of the compounds and elements detected in the blanks and calibration results, the overall accuracy was determined to be acceptable for all analyses. The analytical DQO for accuracy has been met, except where noted. A comprehensive discussion of the method and field QC blank results are presented in Appendix D.

4.6.3 Representativeness

Based on an evaluation of sample precision and accuracy, the samples collected during the SVAD-067 and SVAD-084 SI are considered to be representative of the environmental conditions.

4.6.4 Comparability

Based on the precision and accuracy assessment presented above, the data collected during the SVAD-067 and SVAD-084 field investigations are considered to be comparable with the data collected during previous investigations. The analytical methods, contract required quantitation limits, and contract required detection limits were the same from task to task.

4.6.5 Completeness

Completeness measures the amount of valid data obtained from the laboratory analysis process and sampling. For data to be considered valid, they must have met all acceptance criteria, including accuracy and precision, as well as any other criteria specified by the analytical methods used.

Results that have been qualified with a "U," "UJ," or "J" for various reasons encountered minor analytical problems with limited impact on the data quality. No results were rejected (R).

DQOs for the SVAD-067 and SVAD-084 SI were set at 90 percent for field sampling and laboratory completeness. Based on the evaluation of the field and laboratory QC results presented in Appendix D, 100 percent of the total environmental sample data collected were used as the basis for all recommendations presented in this report.

4.6.6 Sensitivity

All sample results were reported using the latest DoD QSM guidance (DoD 2017). The DL, limit of detection (LOD), and LOQ criteria specified in the UFP-QAPP (Leidos 2014) and UFP-QAPP Appendix 2 (Leidos 2018a) were met except in instances where dilutions were required. In instances where dilutions were required, lesser diluted analyses were used wherever possible.

4.6.7 Data Usability Assessment

All analytical data, data validation qualifiers, and QC results were evaluated to determine the confidence with which the results could be used in the decision-making process. An evaluation of the data quality indicator (PARCC and sensitivity) results in the preceding sections were used to determine the overall data usability. No data points were rejected during the data validation process. As a result, data completeness was excellent at 100 percent complete. Seventy-eight of the planned 78 data points are considered fully usable for decision making. Three results were qualified as nondetect (U) due to continuing calibration blank contamination, and three results were qualified as estimated (J) due to IS area counts that were slightly above (7 percent) the UCL. Results that were qualified as "U," "UJ," or "J" for various reasons encountered minor analytical problems, but are considered fully usable for decision-making.

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5. SVAD-067 SITE HISTORY AND NATURE OF DETECTED CHEMICALS

This section presents the site history and analytical results of the SI groundwater sampling conducted at SVAD-067.

5.1 SITE HISTORY

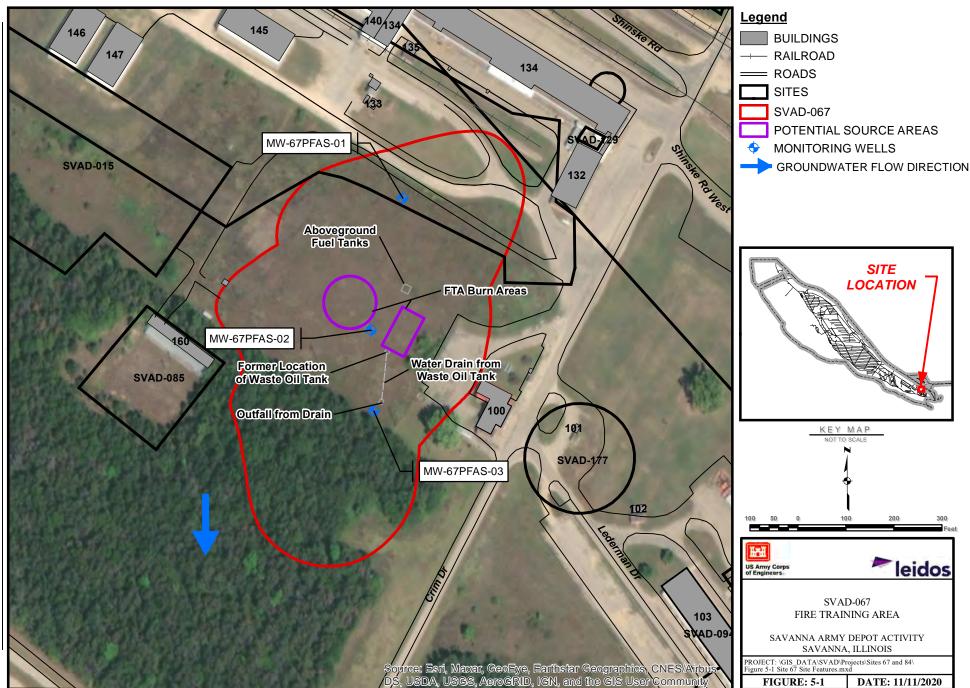
SVAD-067 is the FTA located in the central portion of the Lower Post facilities, west of Crim Drive and north of McIntyre Road. The site encompasses approximately 8.6 acres behind the Fire Station, Building 100. The SVAD-067 FTA was used for approximately 40 years to train fire fighters in various methods of controlling oil-related fires (SAIC 1999a). Waste oil and other flammable materials were released to a bermed shallow pit area and set afire, to be quenched by Fire Department personnel. Historical aerial photographs of SVDA indicated that a burn area possibly was used as early as 1947. A waste oil tank was used to store waste oil for use during fire training exercises and was located adjacent to the burn area. The tank was removed after 1988. By 1952, a well-defined circular, bermed burn area with a diameter of approximately 90 feet was present. The burn area was still clearly present, with a similar configuration, in 1964. By 1970, the circular burn area had been replaced by a smaller square burn area (roughly 40 by 40 feet), slightly off-center toward the east relative to the preceding circular area (SAIC 1999a). Figure 5-1 depicts the SVAD-067 site features.

SVAD-067 was recommended for investigation in 1988 by the U.S. Army Environmental Hygiene Agency after evidence of spilled oil and burned residue indicated a potential environmental impact from the past usage of the FTA (SAIC 1999a). The FTA was subdivided into two potential source areas: Site 67A, the tank that was used to store waste oil for use during fire training exercises, and Site 67B, the fire training pit where oil was burned on the ground. Other site features included the area where water associated with the waste oil tank was discharged to the ground surface, aboveground metal trays used to support fire training exercises, and two 500-gallon fuel aboveground storage tanks used to supply fuel to the metal trays for training.

Past activities at this site impacted the soil and groundwater. Historical investigations indicated the chemicals in soil and groundwater include VOCs (primarily trichloroethene [TCE] and tetrachloroethene [PCE]) and petroleum constituents, including polynuclear aromatic hydrocarbons (PAHs). Soils were determined to be characteristic hazardous wastes under RCRA based on TCE and PCE concentrations. A remedial action, which addressed soils only, eliminated the source of continuing VOC and PAH groundwater contamination. Remediation of contaminated soil was initiated in 1993 and consisted of the excavation of 20,345 cubic yards of soil followed by treatment using low-temperature thermal desorption. Approximately 40 to 45 percent of the thermally treated soil required subsequent treatment with lime to stabilize high concentrations of lead. All treated and stabilized soil was returned to the excavation area as backfill and regraded (Four Seasons 1998). The remedial action successfully eliminated the primary source (VOC- and PAH-contaminated soil) of groundwater contamination in the area; however, subsequent groundwater sampling indicated that groundwater quality near SVAD-067 had been adversely affected.

In the fall of 1998 and fall of 1999, Phase I and II sampling activities were conducted at SVAD-067 to delineate the extent of groundwater contamination. Sampling data indicated that elevated VOC concentrations in groundwater were localized. TCE and cis-1,2-dichloroethene (cis-1,2-DCE) were detected primarily in the shallow groundwater samples with the exception of TCE being detected in a mid-depth well at 75 feet BLS. Additional rounds of groundwater sampling were conducted in 2003, 2007, and 2008. During the four consecutive quarters of monitoring in addition to the two quarters of monitoring in January and April 2007, TCE was the only COC detected in the groundwater at SVAD-067. TCE was not detected at concentrations exceeding the residential human health screening level (2.6 micrograms per liter $[\mu g/L]$) and were detected only in one shallow well that was bound by wells with nondetects for TCE.





ч N Based on the groundwater sampling, it was determined that human health risks from SVAD-67 were acceptable due to remediation of the soil and decrease of COC concentrations in groundwater below risk-based screening levels.

PFAS constituents were not analyzed for during the historical soil and groundwater sampling activities. Based on historical records reviews (SAIC 1999a) and recent interviews with the former SVDA Fire Chief, fire training activities at SVAD-067 may have utilized AFFF. As a result, the Army determined that an SI for potential PFOS and PFOA was necessary at SVAD-067.

5.2 CONCEPTUAL SITE MODEL

A preliminary conceptual site model (CSM) is provided in Figure 5-2. The primary release mechanism of PFAS to the environment at SVAD-067 is from the use of AFFF products to extinguish fires during firefighting training activities. During the fire training exercises, contaminants released onto the soil subsequently would have migrated to groundwater. The primary potential route of transport of PFAS constituents at SVAD-067 is to groundwater via leaching and percolation.

As discussed in Section 5.1, 20,345 cubic yards of soil were excavated and thermally treated using low-temperature thermal desorption to address TCE and PCE concentrations at SVAD-067. All treated and stabilized soil was returned to the excavation area as backfill and regraded (Four Seasons 1998). The temperatures used to achieve thermal desorption for TCE and PCE were unlikely to have reduced PFAS concentrations in soil.

Currently, SVAD-067 is inactive and visited infrequently. The planned future land use is specified in the Local Redevelopment Plan (ERA 1997) and Reuse Plan Map (MSA 1999, revised by SAIC 2018). According to this plan, the planned future land use for SVAD-067 is industrial/commercial.

5.3 SI SAMPLING AND RESULTS

The SVAD-067 SI was conducted in the fall of 2018. SI activities included the installation and sampling of three groundwater monitoring wells (MW-67PFAS-01, MW-67PFAS-02, MW-67PFAS-03). Groundwater samples were analyzed for the six UCMR3. The results for site concentrations were then compared to the USEPA LHA and the USEPA tap water RSLs. The monitoring well locations and analytical results are shown in Figure 5-3.

The three monitoring wells at SVAD-067 were placed at the potential release area (MW-67PFAS-02), as well as upgradient of (MW-67PFAS-01) and downgradient from (MW-67PFAS-03) the potential release area. The SVAD-067 potential release area was assumed to be co-located with the historical highest concentrations of soil and groundwater contaminants (i.e., TCE) and adjacent to the fire training pit. The predominant groundwater flow direction at SVAD-067 is south and was determined using data from continuous groundwater monitoring over a 12-month period (January through December 1999). The groundwater sample from the northernmost well established whether the periods of groundwater flow reversal have impacted groundwater in the typically upgradient direction from the source area. Four groundwater samples (including one field duplicate at MW-67PFAS-02) were collected at SVAD-067 and analyzed for the six UCMR3 PFAS chemicals.

All six PFAS compounds were detected in groundwater from each of the three monitoring wells (with the exception of PFHpA at MW-67PFAS-01). PFBS concentrations did not exceed the RSL of 40,000 ng/L. Individual PFOS and PFOA concentrations exceeded both the USEPA RSL of 40 ng/L and the USEPA drinking water LHA of 70 ng/L (USEPA 2016a and 2016b) at MW-67PFAS-02 and MW-67PFAS-03. At MW-67PFAS-01 (the upgradient well), PFOS was detected at 33 ng/L; therefore, it did not exceed the screening values. However, PFOA did exceed both the USEPA RSL of 40 ng/L and the USEPA drinking water LHA of 70 ng/L (USEPA 2016b). The combined PFOS and PFOA concentrations exceeded the USEPA drinking water LHA at all three monitoring wells. No screening criteria are available for PFHxS,

PFHpA, or PFNA. The analytical results are presented in Table 5-1. Data presentation tables are provided in Appendix E.

Based on the results of the SI groundwater sampling, PFOS/PFOA chemicals at levels exceeding the screening criteria are present at SVAD-067. Each of the three SVAD-067 wells contained exceedances of PFOS and/or PFOA, but the highest combined PFOS and PFOA concentration occurred in the downgradient well (MW-67PFAS-03). The presence of PFOA at concentrations exceeding the LHA in the upgradient well (MW-67PFAS-01) is indicative that the groundwater flow reversal has likely impacted groundwater in the typically upgradient direction from the source area.

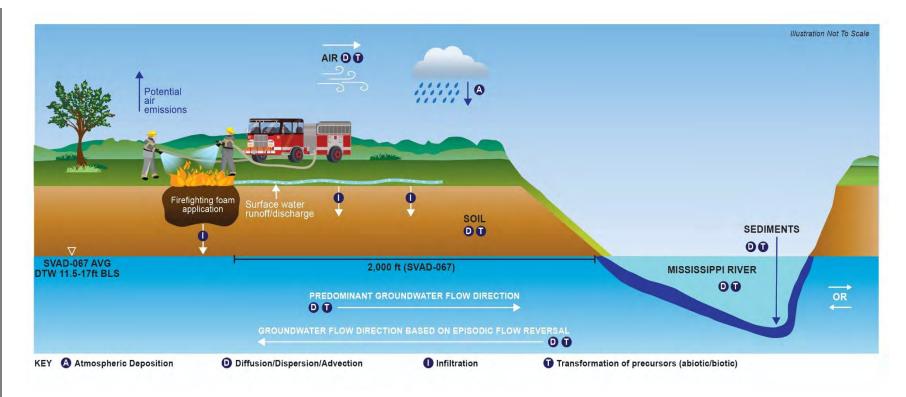


Figure 5-2. SVAD-067 Fire Training Area Preliminary Site Conceptual Model

Table 5-1. PFAS Analytical Results at SVAD-067 Savanna Army Depot Activity, Savanna, Illinois

Location ID Sample ID Sample Type Depth (ft) Parameter Sample Date	Units	Project Action Limit [P]	Tap Water RSL [T]	MW-67PFAS-01 LDOS01 WELL 17.62 10/02/2018	MW-67PFAS-02 LDOS01 WELL 17.63 10/02/2018	MW-67PFAS-02 LDOS01D WELL 17.63 10/02/2018	MW-67PFAS-03 LDOS01 WELL 19.92 10/02/2018
PFAS							
Perfluorobutane sulfonate (PFBS)	ng/L	400000	40000	3.4	3.1	3.3	6.2 J
Perfluoroheptanoic acid (PFHpA)	ng/L	N/A	N/A	1.9 U	19	19	16
Perfluorohexane sulfonate (PFHxS)	ng/L	N/A	N/A	99	52	51	440
Perfluorononanoic acid (PFNA)	ng/L	N/A	N/A	1.4 J	0.69 J	1.2 J	1.7 J
Perfluorooctane sulfonate (PFOS)	ng/L	70	40	33	160 [P] [T]	170 [P] [T]	100 [P] [T]
Perfluorooctanoic acid (PFOA)	ng/L	70	40	350 [P]	200 [P] [T]	200 [P] [T]	470 [P][T]
PFOS + PFOA	ng/L	70	-	383 [P]	360 [P]	370 [P]	570 [P]

Data Qualifiers:

J = Estimated concentration.

U = Chemical not detected above the laboratory detection limit.

^a The USEPA LHA for groundwater is a drinking water advisory, as updated in 2016. When both PFOS and PFOA are detected in water, the combined concentrations of PFOS and PFOA should be compared to the 70-ng/L LHA.

^b The tap water screening levels of 40 ng/L for PFOS and PFOA and 40,000 ng/L for PFBS are cited in the ASD *Investigating Per- and Polyfluoroalkyl Substances* within *the Department of Defense Cleanup Program* Memorandum (ASD 2019). These are residential scenario screening levels calculated using the USEPA RSL calculator (HQ=0.1). The screening level of 40 ng/L does not apply to the combined concentrations of PFOS and PFOA.

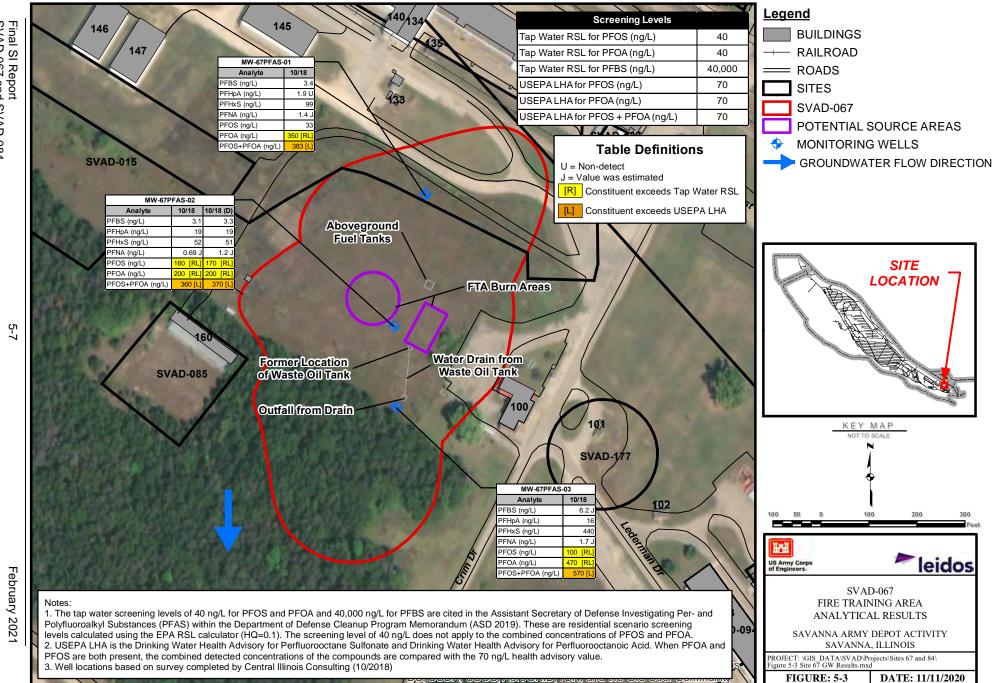
Bold values denote detected concentrations.

[P] = Concentration exceeds the USEPA LHA.

[T] = Concentration exceeds the Tap Water Screening Level.

N/A = No PAL or screening level available.

5-6



Final SI Report SVAD-067 and SVAD-084 Savanna Army Depot Activity THIS PAGE WAS INTENTIONALLY LEFT BLANK

6. SVAD-084 SITE HISTORY AND NATURE OF DETECTED CHEMICALS

This section presents the analytical results of the SI groundwater sampling conducted at SVAD-084.

6.1 SITE HISTORY

SVAD-084 is the Scrap Wood Open Burn Area located along West Road north of the Industrial Sewage Plant (SVAD-036) and southwest of the Chromium Ore Open Storage Area (SVAD-047). SVAD-084 is approximately 4.3 acres. The site was used to train firefighters by burning scrap wood. Wood collected from the shop areas was stockpiled at the site, covered with diesel fuel, and ignited (SAIC 1999a). In addition, two trailer structures and various other materials reportedly were burned in this area. SVDA personnel have indicated that SVAD-084 was used for more than 20 years, but open burning was limited to approximately once each year (SAIC 1999a). A strong petroleum odor was noted during the 1999 EBS visual inspection (SAIC 1999a). Open burning ended in early 2000. Figure 6-1 depicts the SVAD-084 site features.

Multiple field investigations were conducted from 1998 through 2003 to determine if chemical constituents from the Scrap Wood Open Burn Area were present. Soil gas, soil, and limited groundwater sampling was conducted at SVAD-084. Based on the results of the RI and human health risk assessment, arsenic, carcinogenic polynuclear aromatic hydrocarbons (cPAHs), dioxins, and furans in the soil were identified as COCs at SVAD-084. Although originally identified in the RI as human health risk drivers, cPAHs, dioxins, and furans were not retained as COCs in the Feasibility Study (FS) (Leidos 2015) after additional evaluation. No COCs were identified for the planned future use (i.e., worker scenario). However, the soil COC associated with unrestricted land use at SVAD-084 was arsenic. In the FS (Leidos 2015), excavation and offsite disposal were recommended as the preferred alternative for SVAD-084. An Interim Removal Action was completed in 2016. A total of approximately 3,232 tons of nonhazardous soil and debris were eccavated and disposed of offsite. After removal activities were completed, confirmation soil samples were collected and ensured that the remaining soils did not contain concentrations above the remedial goal. SVAD-084 achieved the unrestricted use criteria with the successful completion of the non-time critical removal action (NTCRA) (Leidos 2017).

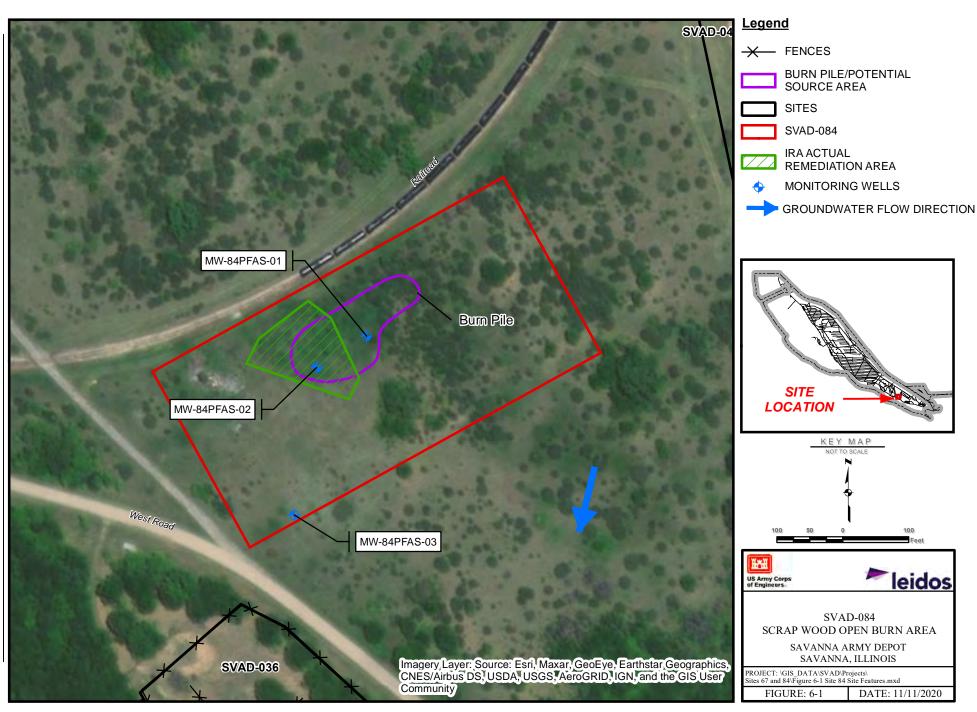
Based on historical records reviews (SAIC 1999a) and recent interviews with the former SVDA Fire Chief, fire training activities at SVAD-084 may have utilized AFFF. Therefore, the potential exists that either PFOS or PFOA was released at SVAD-084. As a result, the Army determined that an SI for potential PFOS and PFOA was necessary at SVAD-084.

6.2 CONCEPTUAL SITE MODEL

A preliminary CSM is provided in Figure 6-2. The primary release mechanism of PFAS to the environment at SVAD-084 is from the use of AFFF products to extinguish burning scrap wood fires during firefighting training activities. During the fire training exercises, contaminants released onto the soil subsequently would have migrated to groundwater. The primary potential route of transport of PFAS constituents at SVAD-084 is to groundwater via leaching and percolation.

As noted in Section 6.1, an interim removal action was completed, and approximately 3,232 tons of nonhazardous soil and debris were excavated and disposed of offsite to address arsenic concentrations. The excavation depth was approximately 1.5 feet BLS and backfilled with clean backfill. PFAS from site activities are not expected to be present within the 0- to 1.5-foot interval but may be present in the soil deeper than 1.5 feet BLS.

Currently, SVAD-084 is inactive and visited infrequently. The planned future land use is specified in the Local Redevelopment Plan (ERA 1997) and Reuse Plan Map (MSA 1999, revised by Leidos 2018c). According to this plan, the planned future land use for SVAD-084 is industrial/commercial.



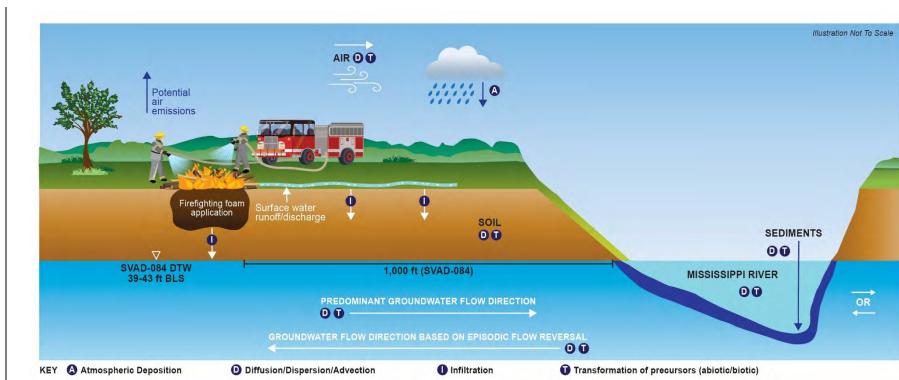


Figure 6-2. SVAD-084 Scrap Wood Open Burn Area Preliminary Site Conceptual Model

6.3 SI SAMPLING AND RESULTS

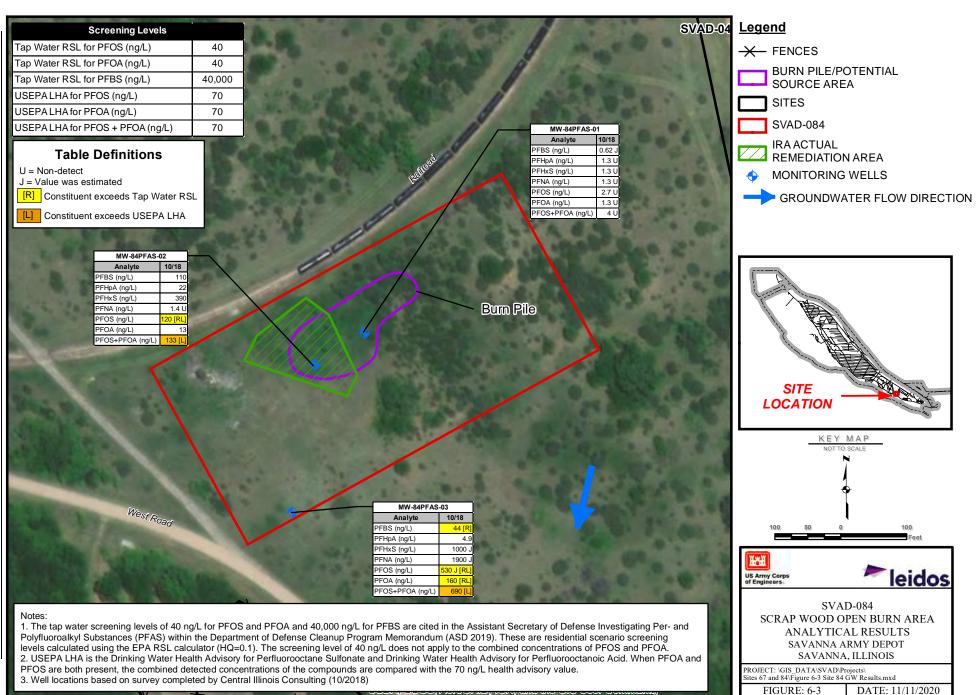
The SVAD-084 SI was conducted in the fall of 2018. SI activities included the installation and sampling of three groundwater monitoring wells (MW-84PFAS-01, MW-84PFAS-02, MW-84PFAS-03). The groundwater samples were analyzed for the six UCMR3 PFAS chemicals. The results for site concentrations of PFAS were then compared to the USEPA LHA and the tap water screening levels. The monitoring wells and the analytical results are shown in Figure 6-3.

The three monitoring wells at SVAD-084 were placed at the potential release area (MW-84PFAS-02), as well as upgradient of (MW-84PFAS-01) and downgradient from (MW-84PFAS-03) the potential release area. The SVAD-084 potential source area was defined by the area of the historical burn pile and the removal action area. The predominant groundwater flow direction at SVAD-084 is south/southwest and was determined using data from continuous groundwater monitoring over a 12-month period (January through December 1999). The groundwater sample from the northernmost well (MW-84PFAS-01) established whether the periods of groundwater flow reversal have impacted groundwater in the typically upgradient direction from the potential source area. Three groundwater samples were collected at SVAD-084 and analyzed for the six UCMR3 PFAS chemicals.

PFBS was the only PFAS compound detected in all three monitoring wells; however, PFBS concentrations did not exceed the RSL of 40,000 ng/L in any of the wells. With the exception of PFBS, no other PFAS compounds were detected in upgradient well MW-84PFAS-01.

Five of the six PFAS compounds (PFNA was not detected) were detected in groundwater from source area well MW-84PFAS-02. No screening criteria are available for PFHxS, PFHpA, or PFNA. The individual PFOS concentration exceeded both the USEPA RSL of 40 ng/L (ASD 2019) and the USEPA drinking water LHA of 70 ng/L (USEPA 2016a) at MW-84PFAS-02; however, the PFOA concentration at MW-84PFAS-02 did not exceed the screening values. The combined PFOS and PFOA concentrations exceeded the USEPA drinking water LHA at source area well MW-84PFAS-02.

All six PFAS compounds were detected in groundwater from downgradient well MW-84PFAS-03. The individual PFOS and PFOA concentrations exceeded both the USEPA RSL of 40 ng/L (ASD 2019) and the EPA drinking water LHA of 70 ng/L (USEPA 2016a and 2016b), and the combined PFOS and PFOA concentrations exceeded the 70-ng/L USEPA drinking water LHA (USEPA 2016a and 2016b) at MW-84PFAS-03. Analytical results for SVAD-084 are presented in Table 6-1.



о С

Table 6-1. PFAS Analytical Results at SVAD-084 Savanna Army Depot Activity, Savanna, Illinois

Location ID Sample ID Sample Type Depth (ft) Parameter Sample Date PFAS		Project Action Limit [P]	Tap Water RSL [T] ^b	MW-84PFAS-01 LDOS01 WELL 42.84 10/03/2018	MW-84PFAS-02 LDOS01 WELL 43.84 10/03/2018	MW-84PFAS-03 LDOS01 WELL 41.18 10/02/2018
Perfluorobutane sulfonate (PFBS)	ng/L	N/A	40000	0.62 J	110	44
Perfluoroheptanoic acid (PFHpA)	ng/L	N/A	N/A	1.3 U	22	4.9
Perfluorohexane sulfonate (PFHxS)	ng/L	N/A	N/A	1.3 U	390	1000 J
Perfluorononanoic acid (PFNA)	ng/L	N/A	N/A	1.3 U	1.4 U	1900 J
Perfluorooctane sulfonate (PFOS)	ng/L	70	40	2.7 U	120 [P][T]	530 J [P][T]
Perfluorooctanoic acid (PFOA)	ng/L	70	40	1.3 U	13	160 [P][T]
PFOS + PFOA	ng/L	70	-	4.0 U	133 [P]	690 [P]

Data Qualifiers:

J = Estimated concentration.

U = Chemical not detected above the laboratory detection limit.

^a The USEPA LHAs for groundwater is a drinking water advisory, as updated in 2016. When both PFOS and PFOA are detected in water, the combined concentrations of PFOS and PFOA should be compared to the 70-ng/L LHA.

^b The tap water screening levels of 40 ng/L for PFOS and PFOA and 40,000 ng/L for PFBS are cited in the ASD *Investigating Perand Polyfluoroalkyl Substances within the Department of Defense Cleanup Program* Memorandum (ASD 2019). These are residential scenario screening levels calculated using the USEPA RSL calculator (HQ=0.1). The screening level of 40 ng/L does not apply to the combined concentrations of PFOS and PFOA.

Bold values denote detected concentrations.

[P] = Concentration exceeds the USEPA LHA.

[T] = Concentration exceeds the Tap Water Screening Level.

N/A = No Project Action Limit or screening level available.

Based on the results of the SI groundwater sampling, PFOS and PFOA at levels exceeding the screening criteria are present at SVAD-084. The highest concentrations of PFOS and PFOA were detected in the downgradient well (MW-84PFAS-03). Given the presence and magnitude of PFOS and PFOA at the SVAD-084 site boundary, it is likely that the contamination is migrating downgradient with potential to impact SVAD-036.

7. SUMMARY AND CONCLUSIONS

In accordance with the June 10, 2016, Department of the Army policy regarding PFAS contamination assessment (Department of the Army 2016), the Army sampled the SVDA Lower Post drinking water on September 26, 2016. The groundwater production well provides the sole source of potable water for the Installation. This well, also known as the Lower Post Bedrock Well, is located in Building 107 and is approximately 1,200 feet deep. The six UCMR3 PFAS compounds were analyzed for and not detected.

Fire training activities at SVAD-067 and SVAD-084 were determined to have utilized AFFF based on historical records reviews (SAIC 1999a) and recent interviews with the former SVDA Fire Chief. The former SVDA Fire Chief was a firefighter during the 1960s and 1970s and was the SVDA Fire Chief from 1987 to 1995. The former SVDA Fire Chief indicated that FTA activities at SVAD-067 utilized AFFF mixed with water and FTA activities at SVAD-084 utilized water and 3M Light Water. 3M Light Water was the brand name for a firefighting foam manufactured by 3M that contained PFOS. As a result, the groundwater at SVAD-067 and SVAD-084 were evaluated for PFOS/PFOA in this SI.

The principal objective of the SI was to gather sufficient information to determine if PFOS/PFOA constituents are present at the sites at concentrations exceeding the USEPA LHA and the tap water screening levels that were calculated using the USEPA RSL calculator and referenced in DoD guidance (ASD 2019). Three monitoring wells were installed, sampled, and analyzed for the six UCMR3 PFAS compounds at each site. PFOS and PFOA concentrations were compared to the USEPA LHA and the tap water screening level.

The SI groundwater sampling results indicate PFOS/PFOA chemicals are present at levels exceeding both the USEPA LHA and the groundwater screening level at SVAD-067 and SVAD-084. The combined PFOS and PFOA concentrations exceeded the LHA at all three monitoring wells at SVAD-067 and at two of the three wells at SVAD-084. A single concentration of PFOS or PFOA exceeded the tap water screening level of 40 ng/L at each site.

It is important to note that the drinking water source at SVDA (i.e., the bedrock production well) was sampled and the six UCMR3 PFAS compounds were not detected. In addition, the contaminated shallow groundwater at issue at SVAD-067 and SVAD-084 is not a source of drinking water. However, more information is needed at this time to determine the risk to human health and the environment at SVAD-067 and SVAD-084 based on the current or planned future land use at SVDA (industrial/commercial).

SVAD-067 is one of several sites that are in the FS stage of the CERCLA process (SVAD-015, SVAD-033, SVAD-067, SVAD-223, and SVAD-006-R-01). The Army intends to proceed with the FS that is currently underway but expand the FS to include a focused RI for PFAS at SVAD-067. The focused RI/FS would define the nature and extent of PFAS at SVAD-067. SVAD-084 is at the Proposed Plan stage of the CERCLA process. The Army intends to pause the Proposed Plan in order to complete a Focused RI and FS for PFAS at SVAD-084. The focused RI would define the nature and extent of PFAS at SVAD-084. The results of the focused RI/FS will be incorporated into the Proposed Plan for SVAD-084.

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APPENDIX A

SVDA DRINKING WATER PFAS DATA

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NORTHERN LAKE SERVICE, INC. Analytical Laboratory and Environmental Services 400 North Lake Avenue - Crandon, WI 54520 Ph: (715)-478-2777 Fax: (715)-478-3060		ANALYTICAL REPORT				WDNR Laboratory ID No. 721026460 WDATCP Laboratory Certification No. 105-330 EPA Laboratory ID No. WI00034 Printed: 10/03/16 Page 1 of 1			
Client:	Savanna Army Depot/JoCarroll Depot LRA Attn: Tim Schoenig 2000 Portland Avenue Savannah, IL 61074						NLS Project: NLS Customer:	268235	
Project:	Perfluorinated Compounds								
Matrix: DW Collected: 09 Parameter Perfluorinate	Dr NLS ID: 948928 9/26/16 08:00 Received: 09/27/16 ed Chemicals by EPA Method 537 Extraction by EPA Method 537	Result see attached yes	Units	Dilution	MRL	Analyzed 10/01/16 09/29/16	Method EPA 537 EPA 537	Lab 721026460 721026460	
Matrix: FB Collected: 09 Parameter Perfluorinate	k NLS ID: 948929 9/26/16 08:00 Received: 09/27/16 ed Chemicals by EPA Method 537 Extraction by EPA Method 537	Result not analyzed not analyzed	Units	Dilution	MRL	Analyzed 10/01/16 10/01/16	Method EPA 537 EPA 537	Lab 721026460 721026460	

 ND = Not Detected (< LOD)</td>
 LOD = Limit of Detection
 LOQ = Limit of Quantitation

 DWB = Dry Weight Basis
 %DWB = (mg/kg DWB) / 10000
 1000 ug/L = 1 mg/L

 MCL = Maximum Contaminant Levels for Drinking Water Samples.
 Shaded results indicate >MCL

Reviewed by:

And Jost

Authorized by R T Krueger President

Sample: 948928 3159 Crain Dr Collected: 09/26/16 Analyzed: 10/01/16 - Analytes: 6

ANALYTE NAME	RESULT	UNITS WWB	DIL	MRL	MCL	Note
perfluorobutanesulfonic acid (PFBS)	ND	ppt	1	90		
perfluoroheptanoic acid (PFHpA)	ND	ppt	1	10		
perfluorohexanesulfonic acid (PFHxS)	ND	ppt	1	30		
perfluorooctanoic acid (PFOA)	ND	ppt	1	20		
perfluorononanoic acid (PFNA)	ND	ppt	1	20		
perfluorooctanesulfonic acid (PFOS)	ND	ppt	1	40		
C13-PFHxA (SURR)	95.519%					S
C13-PFDA (SURR)	99.117%					S

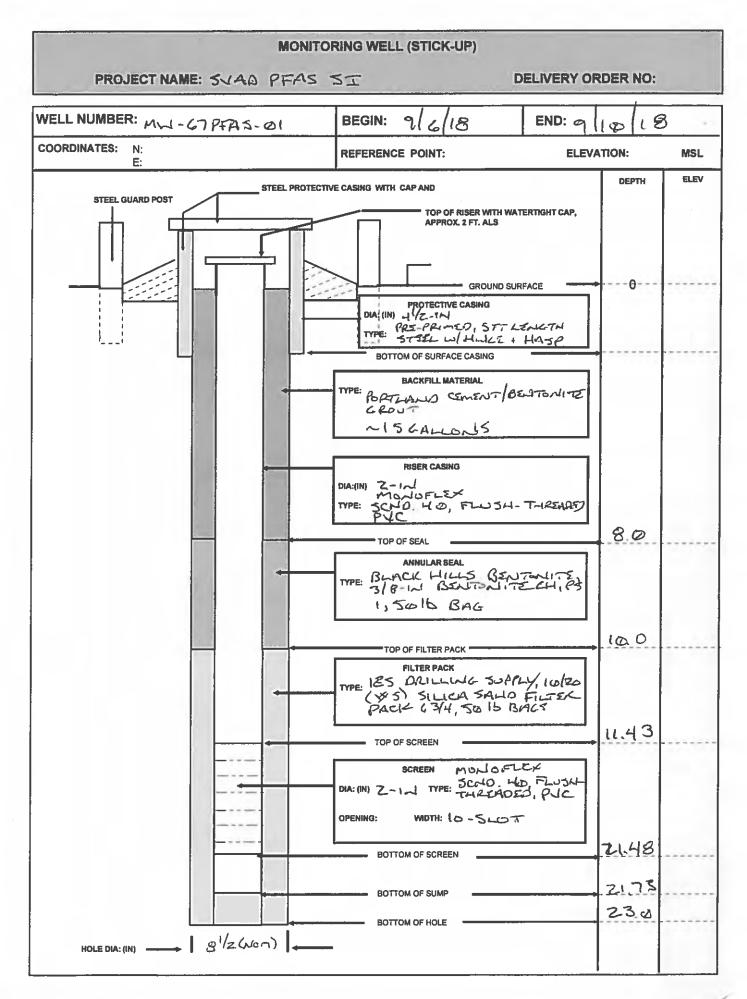
NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.

APPENDIX B

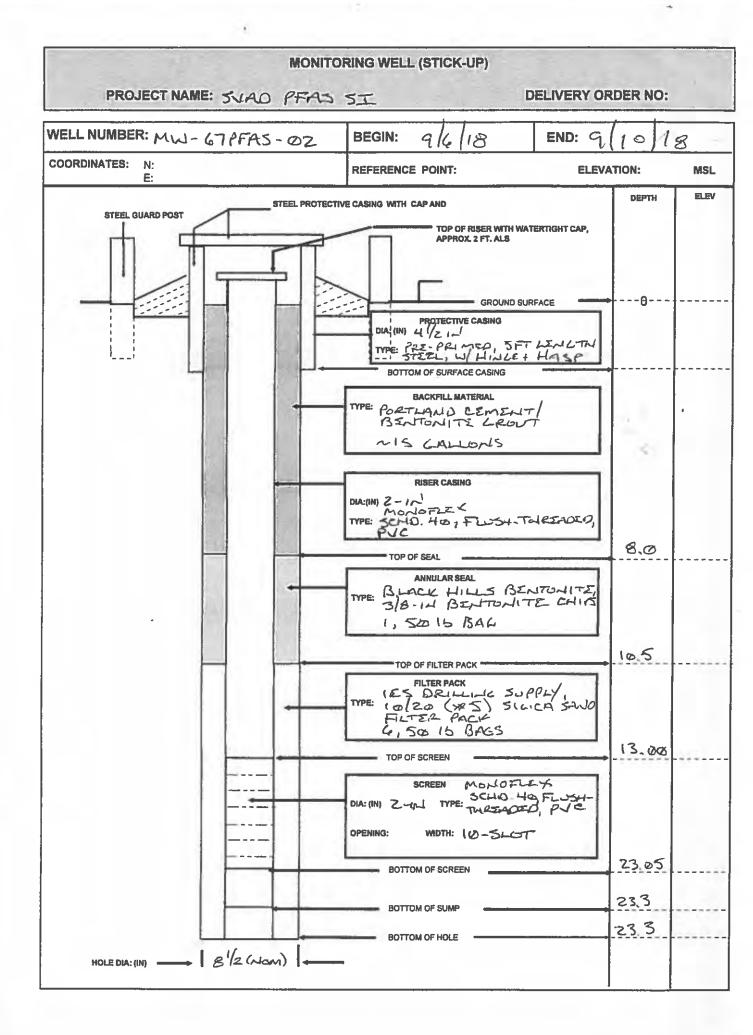
WELL CONSTRUCTION, WELL DEVELOPMENT, AND GROUNDWATER SAMPLING LOGS

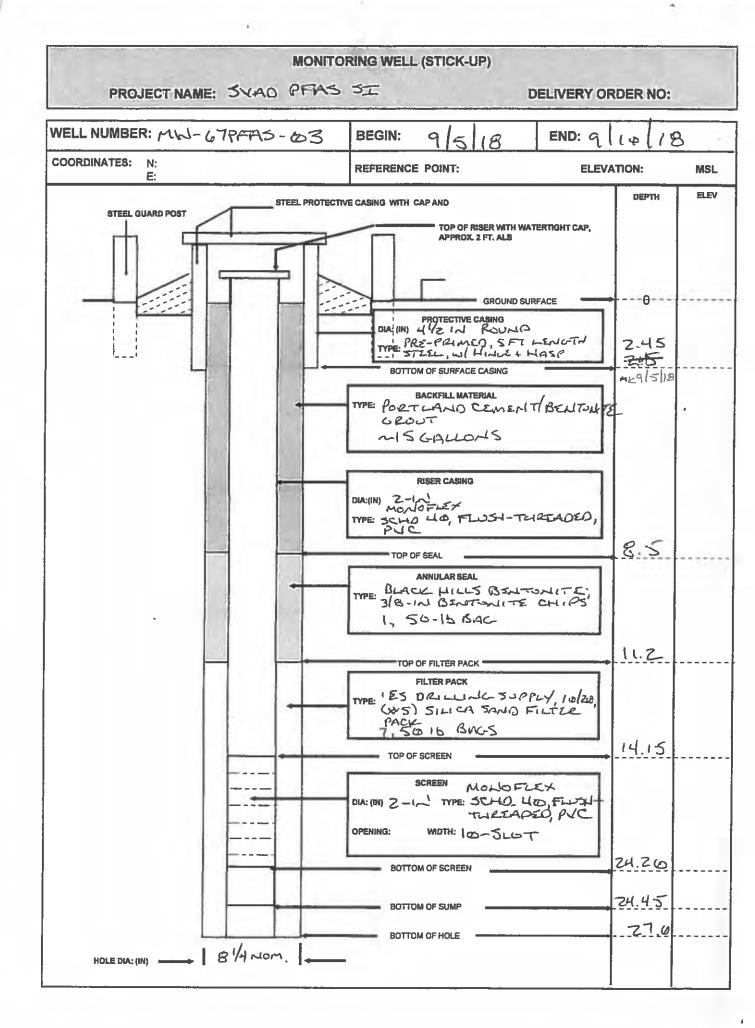
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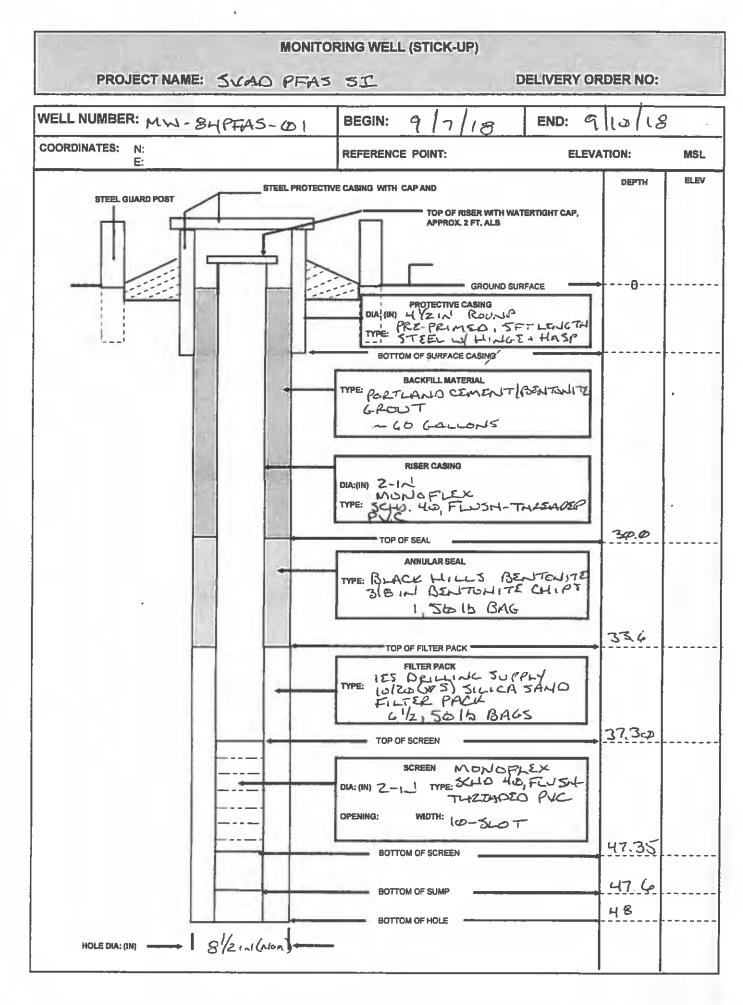


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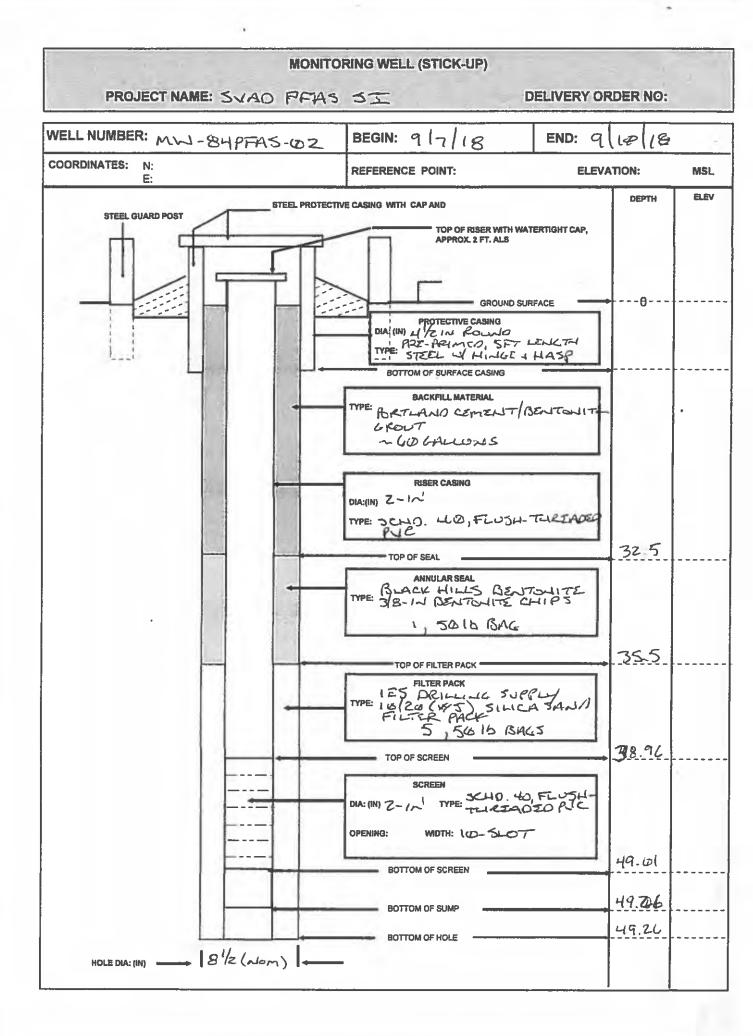


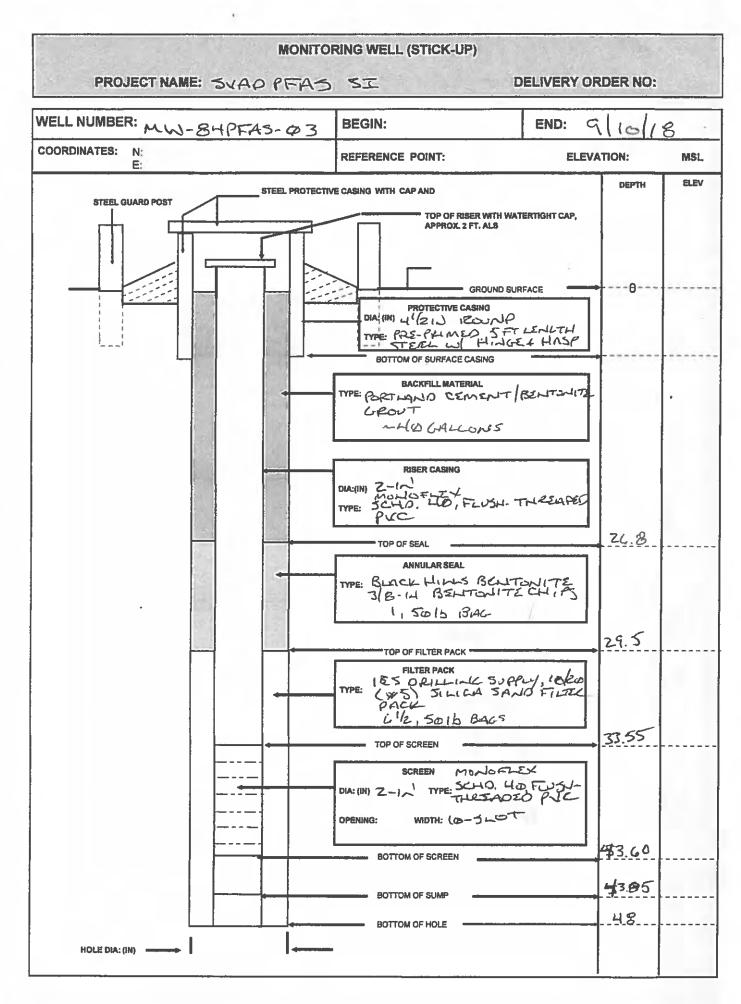




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WELL DEVELOPME	NT FORM
PROJECT NAME: SUAD PEAS SI	DELIVERY ORDER NO:
Date: <u>9 /9 /18</u>	Time: 1430
Well Number and Location: MUL-C7PEAS 01	SVAD SITE 67
Comments: WATER WITHALLY BALLE	O AND PUMPED WAS VERY
TURBID; APPEARANCE OF	COFFER,
me g/g	/
	4
Water Levels / Time: Initial: 17.200 / 12:12	Pumping: 17.20 / VARIOUS
Final: 17.201 14:30	
Total Well Depth: Initial: 25.62 FT BTOC	Final: 25.62 FT BTOC
Date and Time: Begin: 9918112:12	Completed: 99918 14:30
Development Method(S): BAIL(SURLE W/ DI	SPOSABLE BAILER. PUMP
w/ moniscoul subm	ERSIBLE PUM
Total Quantity of Water Removed: 54 gals	

FIELD MEASUREMENT	SERIAL NUMBER	DATE OF LAST CALIBRATION
Temperature	920-MP-202	9/9/8
Specific Conductivity		
рН		
Turbidity		MA
DO		
ORP		

PROJECT NAME: SUAD PEAS SI

DELIVERY ORDER NO:

WELL NUMBER: MW-G7PFA3-01

DATE	BEGINNING TIME	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY	pH (STANDARD UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	WELL VOLUMES REMOVED	(FT BTUE) COMMENTS
9/9/18	1330	30	15.20		5.74	98.3	30	21,21	17.20 BYOMLAT
	1340	~2	13.53	6.291	80.2	63.7	34	24.3	17.20
	135Ø	.n. by	13.37	Ø.297	6.10	19.3	38	27.1	17.20
	1400	~4	13.32	9.294	6.09	20.0	42	30.0	17.20
	141Ø	-4	13.54	Ø. 293	6.09	22.1	46	32.9	17.20
_	142Ø	24	13.41	Ø.29Ø	6.10	26.3	5ø	35.7	17.20
4	1425	~2	13.38	Ø.289	6.13	Z.5	52	37.1	17.20
V	1430	~2	13.41	Ø. 29Ø	6.13	3.1	54	38.6	17.20
<u>.</u>			DEU	ELOPMER	or con	PLETE	0		
							*		
									-
							1	~~	
					and	2/2/10			
						- wa			
									1 CASING DELVINE = 1.4 CALL

RECORDED BY: Multiple a/g/18 QA CHECKED BY: Cen for a/10/18

B-8

WELL DEVELO	DPMENT FORM
PROJECT NAME: SU QO PFAS 52	DELIVERY ORDER NO:
Date: <u>1 /9 /18</u>	Time: <u>1245</u>
Well Number and Location: MW-L7PFA5-0	DZ SUAD SITE 67
Well Number and Location: MW-L7PFAS-Q me 9/9/1 Comments : WATER INITIALLY POM BR	HIED/PUMPED WAS TURBID;
	TURBIDITY DECLINED
RAPIDLE AFTER ~154	that's REMOVED
- mk 9	
دمت Water Levels / Time: Initial: <u>17.98 / 17.9</u> ۲۰۲۱ Final: <u>18.01 / 1215</u>	8 Pumping: 18.01 / VARIOS
Total Well Depth: Initial: 25.71 FT F	BTOC Final: 25.71 FT BTOC
Date and Time: Begin: 9/9/18/ 100 3-5	Completed: 9/9/18/ 12/15
Development Method(S): BAIL/SURLE W NEL	DISPOSABLE BAILSR, PUMP W
SUBMERSISLE PUMP	
Total Quantity of Water Removed: 37	cals

FIELD MEASUREMENT	SERIAL NUMBER	DATE OF LAST CALIBRATION
Temperature	QEO MP-208 REE 65 NO: 16369	9/9/18
Specific Conductivity		
рН		
Turbidity		Nela
DO		
ORP		

PROJECT NAME: SUAD PEAS SI

DELIVERY ORDER NO:

WELL NUMBER: MW-GIPFAS-02

DATE	BEGINNING TIME	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY	pH (STANDARD UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	WELL VOLUMES REMOVED	WL (FT BTOC)	COMMENTS
<u> 519/18</u>	1135	25	13,57	0.458	5.90	94.0	25	19.8	18.01	
	1145	~3	13.51	0.465	6.69	9.5	z8	22.2	18.001	· · · · · · · · · · · · · · · · · · ·
	1155	~3	14.12	0.467	6.84	4.3	31	24.6	18.01	
	1205	~3		0.467	6.88	Ч. \	34	27.08	18.01	<u></u>
₩	1215	~3	14.00	0.468	6.90	3.4	37	29.4	18.01	
		R	EJEL	DPMENT	compi	ETER				
										•
					h.					
·					ery g	2/10				
										t.
					·					
FCORDER	BY. M	Kilp		lala		1	ell volum	e = 1.2	le gallons	

WELL DEVELOPM	ENT FORM
PROJECT NAME: SUAD PITAS SI	DELIVERY ORDER NO:
Date: <u>2/7/18</u>	Time: 10/(ø
Well Number and Location: MM-C7PFAS-03	SUND SITE 67
Comments: WATER VERY TURBID THRD REMOVED, THEN EUSARED &	
mik q	
Water Levels / Time: Initial: 12.55 / 0740 Final: 12.53 / 1016	Pumping: 12.58 1 12.5 WE 9/9/18
Date and Time: Begin: <u>9/9/18 / 07:40</u>	Final: <u>24.40</u> FT BTOC Completed: <u>9/9/19/10:10</u>
Development Method(S): BAIL/JURLE W/ DISPO	
Total Quantity of Water Removed:53gal	5

· FIELD MEASUREMENT	SERIAL NUMBER	DATE OF LAST CALIBRATION
Temperature	QED MP-200 EEKSNO: 16369	9/9/18
Specific Conductivity		
рН		
Turbidity		24/17
DO		NA
ORP		~1/2

PROJECT NAME: SVAO PEAS SI

DELIVERY ORDER NO:

WELL NUMBER: MWI-67PFAS-63

DATE	BEGINNING TIME	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY TPMHOSICMI ME MS/CM 19	pH (STANDARD (1) UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	Well. Volumes Removed	COMMENTS
919/18	a849	29	12.38	0.120	553	647	29	3.51	12.58
	0900	3	12.39	0.119	5.83	Z54	32	13.9	12.58 WL STABLE 12.58 WL STABLE
	0910	3	12.55	0.118	5.87	180	35	15. Z	12.58
	10920	3	12.02	0.118	5.89	115	38	16.5	12 58
	0932	3	12.48	Ø,116	5.91	76.1	41	17.8	12.58 920mlmm
	ଡବ୍ୟର	3	12.45	0.117	5.92	51.6	44	19.1	12.58
	2950	3	12.48	0.117	5.93	19.5	47	20, 1	12.55
	1000	3	12.54	0.114	5.94	10.7	50	21.7	12:58
	1005	~1,5	12.58	0.116	594	11.4	51.5	22.4	12.58
	1010	-1.5	12.50	0.116	5.15	10.6	53	23.0	12.58
		36	WELDF	PMENT	compl	ETED			
							MZ		
								2/9/18	
ų/									ICASING VOLUME= 2- JOALLONK

RECORDED BY: 1/ Kapp 9/9/18 QA CHECKED BY: Cen for 9/10/18

B-12

PROJECT NAME: SVAD PEAS SI

DELIVERY ORDER NO:

WELL NUMBER: MW - 84 PFAS - OI

DATE	BEGINNING TIME	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY (µMHOS/CM)	pH (STANDARD UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	WELL VOLUMES REMOVED	WL FX BTOC COMMENTS
9/10/18	1010	27	13.04	0.279	6-51	302	27		43.23
	1020	23	13,12	B.282	7.08	22.3	30		43.23
	1030	~ 3	13.27	0.281	7.25	11.5	33		43.23
	1040	~ 3	13.01	0.283	7.34	8.0	36		43.23
4	1050	~3	13.18	0.278	7-28	7.9	39		43.23
				- DEVEL	いちってい	r comp	LETED		
					174	2/. 1			
	<u> </u>					2/10/18			
	<u> </u>								

RECORDED BY: _____ Que q/10/18

QA CHECKED BY: _____

B-13

WELL DEVELOP	MENT FORM
PROJECT NAME: SVAO PFAS SI	DELIVERY ORDER NO:
Date: 9/10/18	Time: 12:35
Well Number and Location: Mul-BUPFAS-	02
Comments : FRST BAILED/PUMPED	MATER TURBID, APPEARACE
OF COFFEE CUEARED	RAPIDLY AFTER ~ 15 CALLONS
RENOVED, MR	- 9/10/10
	-118
Water Levels / Time: Initial: <u>42.72 / 10:35</u>	Pumping: 42,75 1 VARIONS
Final: 42.751 12:35	
	OC Final: 51.36 FT BTOC
Date and Time: Begin: 4/10/18/ 1035	_ Completed: <u>9/10/18/1235</u>
Development Method(S): SURGE/BALL W/ C	ISPOSABLE BAILER; PUMP
WITH JUBMIESIBLE	PUMP
Total Quantity of Water Removed: 32	gals

FIELD MEASUREMENT	SERIAL NUMBER	DATE OF LAST CALIBRATION
Temperature	020 MP-20 8225- 16369	9/10/18
Specific Conductivity		
рН		6
Turbidity	J J	NA
DO	nelt	nela
ORP	MA	Mla

PROJECT NAME:

DELIVERY ORDER NO:

WELL NUMBER: MU- SU PEAS-02

		- QH PFA3	- 202						
DATE	Beginning Time	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY (µMHOS/CM)	, pH (STANDARD UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	WELL VOLUMES REMOVED	W2 FK. BTOC COMMENTS
9/10/18	1155	20	12.45	0.228	6.52	135	20		42.75
	1205	~3	12.26	0.728	7.80	10.4	23		42.75
	1215	~3	12-34	0.229	8.07	5.4	26		42.75
	1225	~3	12.30	0.228	8.14	3.9	29		42.75
1	1235	~]	12.35	0.228	8.16	3.7	32		42.75
-			DEN	ELOPMEN	to com	PLETER	p		
$\langle \rangle$									
					11.				
						Lie/ce			
				<i>z</i>					

RECORDED BY: _____ Qlu g /10/18

QA CHECKED BY: _____

WELL DEVELOPMEN	TFORM
PROJECT NAME: SVAD PFAS ST	DELIVERY ORDER NO:
Date: <u>1/10/18</u>	Time: 07.005
Well Number and Location: MUJ-84PFA5-03	SVAD JITE 84
Comments: WATER TRANSLUCENTE	VENT AFTER SUDGING
BAILING. No glim	
	La
Water Levels / Time: Initial: 38,97 / 07:15	Pumping: 38.98 IVAIRIOS
Final: 38.98 1 09:05	
Total Well Depth: Initial: <u> </u>	Final: <u>46.17</u> FT BTOC
Date and Time: Begin: <u>9/10/19 1</u> 0715 C	ompleted: 9/10/18 / 10905
Development Method(S): SJRLE/BAIL 0/ DESP	OSABLE BAILER, PUMP
W/ SUBMERSIBLE PU	mp.
Total Quantity of Water Removed: 43 gals	

FIELD MEASUREMENT	SERIAL NUMBER	DATE OF LAST CALIBRATION	
Temperature	QEO MP-20 REELSNO: 16369	9/10/18	
Specific Conductivity			
рН			
Turbidity		r-1/A	
DO	nela	n/12	
ORP	MA	N/A	

PROJECT NAME: SVAD PFAS SI

DELIVERY ORDER NO:

WELL NUMBER: MW-84PFAS-63

	BEGINNING TIME	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY	pH (STANDARD UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	WELL VOLUMES REMOVED	FT BTOC) COMMENTS
9/10/18		25	13.33	0.333	5.60	380	25		38.98
	0815	23	12 38	0.312	7.85	38.6	28		38.98
	0825	~3	12.35	Ø.308	8.13	14.0	31		38.98
	0835	~3	12.37	0.307	8.18	7.3	34		38.98
_	0845	~ 3	12.50	0.308	8.17	5.7	37		38.98
	0855	~ 3		0.308	8.16	5.3	40		38.98
	0905	~ 3	12.75	0.308	8.16	4.4	43		38.98
		- DZY	sign	IEND, CO	METER	>			
					,				
					- Aug	2/10/			
						1			

RECORDED BY: Cleh for 9/10/18

QA CHECKED BY: Milling 9/10/10

B-17

PROJECT NAME: SUAD PEAS ST. DELIVERY ORDER NO:
Date (mm/dd/yy): 9/5/18 SUM TUW Th F Sa PAGE OF 7
M. KLICZEJS-LEIDOS, P.G. GARY SULFT-MATECO, DRIVER
CHARLES SPURR-LEIDOS, GEOL JEFF CROEL-MATECO, HELPER
DANA WINSLOW-LEICOS, SUXOS MIL 9/5/10
Narrative (include time and location):
0656 CREWS ARRIVE AT SITE 67 OF JUDA.
0700 HULD PRE-ENTRY BRIEFING AND GO THROUGH
"FIELD CHECKLIST FOR PFE SAMPLE COLLECTION"
(SEE FIELD FORMS).
~ 0740 MEET W TOOD KNUTH (USACE). GET APPROVAL
TO UNLOAD ORILLER'S JUPPLIES IN LOT AT NORTH
END OF OND FIRE STATION (BLOG 100).
~ 0750 SPEAK W/ TIM SCHOEINCAREGARDING WATER
SOURCE. HE ADVISES THAT WE CAN USE THE
FIRE HYDRANT AT THE INTERSECTION OF
CN AND MEINTYRE ROADS, LATER, AFTER SPEAKING
AGAIN W CATHY COLLIDS AND TODO KNUTH, WILL
CALL TIM BACK W/ BILLING INFO FOR L'ATTER.
-BEDDMATTCO'S VENDOR UNLOADS DRILLINK AND LICH
INSTALLATION MATERIALS.

Daily Weather Conditions: A.M. (OBODD) MOSTLY CLOUDY, TEMP 75, WIND 554/ AT -10. P.M. (1100) CLOUDY, RAIN, TEMP 78, WIND WSW ~ 10mpt - 10/ 9/5/18 QA Checked By Ulle for a/6/18 Recorded By _ 12

PROJECT NAME: STAO PEAS ST DELIVERY ORDER NO:
Date (mm/dd/yy): <u>9(5/18</u> Su M Tu W Th F Sa PAGE Z OF 7 Task Team Members:
JEE PL. 10F7
Narrative (include time and location): -0800 DANIA AND CHARLES BEGIN CLEARNE FOR UND
ON PATHS TO, AND AT, BRILLING JITES AT 67.
OBZES DANA AND CHARLES OFF TO LLEAR FOR UXO AT
SITE BUL DEILL CREW EMPTIES THELE TWO
POTABLE WATER TANKS THEN FILLS TANKS
- FROM HYDRANT. (SEO GALLONS)
0900 COLLECT POTABLE SOURCE WATER BLANK (FILLO BLANK
FROM HYDRANET, BACK-FLOW PREVENTER AND
HOSE (Z, ZSO-ML, TRIZMA PRESERVED
CONTIGINERS). SAMPLE 10: MW-67PTAS-03 LOOSFBUSI
09210 RITURN TO SITE LT. DRILL CREW SETS UP DECON
PAD. DECON AUGRES AND TOOLING
INVENTORY WELL MATERIALS + DRILLING SUPPLIES:
DENTOHITE CHIPS - BLACK HILLS BENITONITE, BENITONITE
PLUK, 3/8-NJ CHIPS

Daily Weather Conditions: A.M.	Mr.	55		
P.M	25/18			
Recorded By Marken 9/5/18	_ QA Checked By	Cler	fr	9/6/18

B-19

TASK TEAM ACTIVITY LOG SHEET PROJECT NAME: SUAD PEAS SI **DELIVERY ORDER NO:** Date (mm/dd/yy): 915/15 PAGE 3 OF 7 Su M Tu W Th F Sa Task Team Members: Sta Sta 100 - 2 Narrative (include time and location): -GEL, HISH VIELD BENTONITE 5 CEMENIT INC. TYPE I PORTLAND. CEMENT-MARU 50PP4, 10/20 (* 5) SILICO SAND - 125 SAND WELL FILTER PACK (1.0 MM) 510299% JOLO BACT RISER - MONOFLEX, SCHO HO, ZYIO, FLUSH. TUREA SCREEN- MONOFLEX, SCHO 40, 2 × 10, FL BH-TH 16 41/2-IN DIAM 5-FT LENGTH PROTECTIVE CAS PRE-PRIMED STEEL, W/ HINGS + LOCKINC HUSP-POSTS-GFT LENGTU, 3-IN DIAM, FIRE-FLD, 300 PSI ASTM 135/AT95-E, STEEL HSAS-61/2-IN DO, 4/2-IN ID, 5-F 81/4 OD HIR-IN BIT -4-IN LENGTH BULLET BI TO RIG = CME 55. MULTED, RZMOTZ- CONTROL TRACK mc 9/5/18-

Daily Weather Conditions: A.M.	12	4			
P.M		2/5/			
Recorded By Making	9/5/18	QA Checked By	Cel	for	9/6/18
	_		v		

DELIVERY ORDER NO: PROJECT NAME: SUAD PEAS SI Date (mm/dd/yy): 9/5/18 PAGE 4 OF 7 Su M Tu (W) Th F Sa Task Team Members: J24 22 100 Narrative (include time and location): 0950 BELLI SETTING UP ON MWI-67PFAS-03 LOCATION NOTE: ALTHOUGH A UTILITY LOCATE HAS BEEN REQUESTED, FIND NO MARKINGS IN AREA. UNDERGROUND ELECTRICAL 13 APPARENT FROM ROXES. DRILLER TO CALL TOOD J (AT MATTCO) TO GET LINES MARKED. NOTE: REVIEWED UTILITY DEAWINGS W/ DANIA. WE AGREE TO THE LIKELY LOCATIONS OF ELECTRICAL 12 AREA. HEAVY RAIN BELINS AROUND 10:00. STAND BY NOTE: JAMIE JOHNSON ALSO CALLS JULIE TO REQUEST RZ-MARK OR ALL CLEAR 1109 USIC REPORTITE; BUT NOT THE ONE WHO MARKS ELECTRICE 1113 VANILVARD ELECTRICAL ON SITE. MAKKS KLECTRICAL WHICH WAS WIN IOFT OF -03 SITE 2/5/13 Daily Weather Conditions: A.M. Cle for 9/6/18 4/5/18 QA Checked By_ Recorded By

	TASK TE	AM ACTIVITY	LOG SHEET	
PROJECT NAME	SVAD PEAS	5I	DELIVERY ORDE	R NO:
Date (mm/dd/yy): _ Task Team Member		Su M Tu 🕢 Th	F Sa PAGE_	5_0F_7
<u> </u>		-52		
	<u></u>			
	<u></u>	^0~	<u>}</u>	
Narrative (include ti	me and location):			$(a,b,a,b) \mapsto (b,a,b) \to (b,a,b)$
1140 BEG	~ HAND A.	verente	TO CLEAN	2 UTILITIES.
BEGIN	How St	En Auge	t (HSA) D	RIZLIAK.
1150 HEAL	RAIN STAR	TS ALAIN	DRILL CR	EW BLEAKS
For i	UNCH. NOTE	- OANA	CLEARED H	JLE FOR
UXO A	FTER HANG	AUCERI+	k	194. S0 regen
1155 DEILL	CREW OF	F SITE	- <u>- Sl-</u> -44	49 11
1250 0K12	- CREW RET	URNS TO	BITE,	
1302 BELA	1 DRILLING		عبرا حق	7. k
13300 END	BRILLING 4	ET 27 FT	BGS, FIRS	T WET
SAND	Lacoretton	AT ~ ZZ	FT. KNIGER	- Pick
				15.5FT BES
MELL	MATTELIALS :	Bottom (AP = 0.25 F	. Sceeed=
				STRUK Lenkra
= 30.40	F		1. The	
1404 7 B	HGS SAND	POURED 1	USIDE AUCI	ERS TO
Daily Weather Condition	ons: A.M	Mr. 9		NO TRACTOR AND A
1/	P.M		5/18	
Recorded By 14/L	_C. 91	5/18 QA Che	acked By Chen	fr 9/6/18
	/			

B-22

PROJECT NAME: JYAO PFAS SZ **DELIVERY ORDER NO:** SUM TUW TH F Sa PAGE COF 7 Date (mm/dd/vv): Task Team Members: SEE PETOF Narrative (include time and location): 11-2 FT BGS 1415 1 BAL BENTONITE POURED TO 8.5 FT HYDRATE BENITOWITE W/ - 5 GALLONDS POTWISLE MATEC 1440 MIX BATCH OF LAUNT CONSISTING OF I, RAC. PORTZAND ~1/4 BAC BENTONITE POWDER ~ OGALLONS MATER, PUMP INSIDE AUGERS 1 PVH AULE23 1530 TIM SCHOELLE COMES OUT TO SITE AFTER TOPP JOHANNISEN (MATECO) DALLED HIM ABOUT WATER HNE THAT EXTENOSN FROM BLOG 100. T.M + KLIDZEST FILD VALUES THAT DEFINE THE WATER LINE. MILGISIS MATT PLANMED LOCATION OF MW-67PATAS-02 15 WIN - LOFT OF THE WATER LINE. TIM ASKS THAT WE MONE THE BORNE - 10 FT WEST. Daily Weather Conditions: A.M. (1445) CLOUDY, RAIN, TEMP 73, WIND MW -5 MPH

Recorded B

11

- these	ASK TEAM ACTIVITY LOG SI	HEET
OJECT NAME: SUAD	PFASSI DEL	VERY ORDER NO:
	7	
te (mm/dd/yy): <u>915/1</u> 8	Su M Tu (V)Th F Sa	PAGE 7 OF 7
k Team Members:	Ú	
		<u> </u>
	SER PETOF)	<u></u>
		^л д
rative (include time and location	IES SITE AFTEL CA	
	1	CLEC OPP , ND
	PIPES LOCATION.	2
640 ALL OTHE	C TEAM MEMBER	5 LEAVE SITE,
NOTE WHIL	E WE WERE SEAR	SMINK FOR THE
WATEL HAIE	THE MATECO CRE	W INSTALLED
THE PROTECTI.	JE CASING ALLO MO	SETTLE COLLAR
ME 9/5/18	THE WER INSTALL	50 Troval
1		
DM. KLICZZI	S OFF SITE FOR	- PFY.
		< ⁰
	hui	
	MK 9/5	
6.0 percent percent de la classica de la comparada de la compar		
		-1
Veather Conditions: A:M.	mk g/2	5 (18
/ /P.M. (1C	50) CLOUDY, RAIH, T 2015/18 QA Checked By	EMP 71, WILLO N AT
jed By	2 9/5/18 QA Checked By	, Celin for 9/6

2

PROJECT NAME: SUAD PE	AS SI	DELIVE	ERY ORDER	NO:
e #		a - 21	5	
Date (mm/dd/yy):	Su M Tu	W Th F Sa	PAGE	OF
Task Team Members:				
			1.41	
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Narrative (include three and location):	2			Ps.
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aily Weather Conditions: A.M.			2011	
P.M				
ecorded By		QA Checked By _		
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PROJECT NAME: SYAD PEAS SI DELIVERY ORDER NO:
Date (mm/dd/yy): 9/6/18 SUM TUW (Th) F Sa PAGE_/ OF 7 Task Team Members: M.KLidZEJS-LEIDOS, R.G. G. SWIFT-MATECO, DRILLE
C. SPURR LEIDOS, GEOR J. CROEL-MATERO, HELPER
D. WINSLOW - LEIDOS, SUXOS - MIC 9/4/18=
Narrative (include time and location): 0635 M.K.JZEJS ON SITE
INSPECT MW-67-PFAS-03. TOP OF PROTECTIVE
CASNU AT ZISFT AGS, TOP OF WELL CASN'L
AT 2.23 FT ALS. MEASURE WL AT 11.3 FT
BELOW GROUND SURFACE (BGS) NOTE: GROUND
HERE IS - 4-5 FT LOWER THAN OTHER 2
PLANNED WELLS AT THIS SETE. URIGINAL STICK-UP
OF ORIGINAL RISER (NOW CUT) WAS 5.95 FT
OLSO REST OF LEICOS CREW AND MATECO ON SITE
OTIO HOLD TAILCHTE SAFETY BRIEFING
6730 BELIN MOVING EQUIPMENT AND RIC ONTO MUL-GAPFAS
EARLIER, DALLA CLEARED PATUL IN AND FOUND LIKELY
LOCATION OF WATER LINE BORING MAS BEEN MOVED
TO POINT ~ 15FT WEST OF OPIGINARLY PLANNEP
LOCATION.

Daily Weather Conditions: A.M. <u>(06.45) CLOUDY, DRIZZLE, TEMP 66, WIND HENDOME</u> Recorded By M.M.M. <u>9/6/18</u> QA Checked By <u>Clu for a /7/18</u>

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PROJECT NAME: SYAD PFAS SI

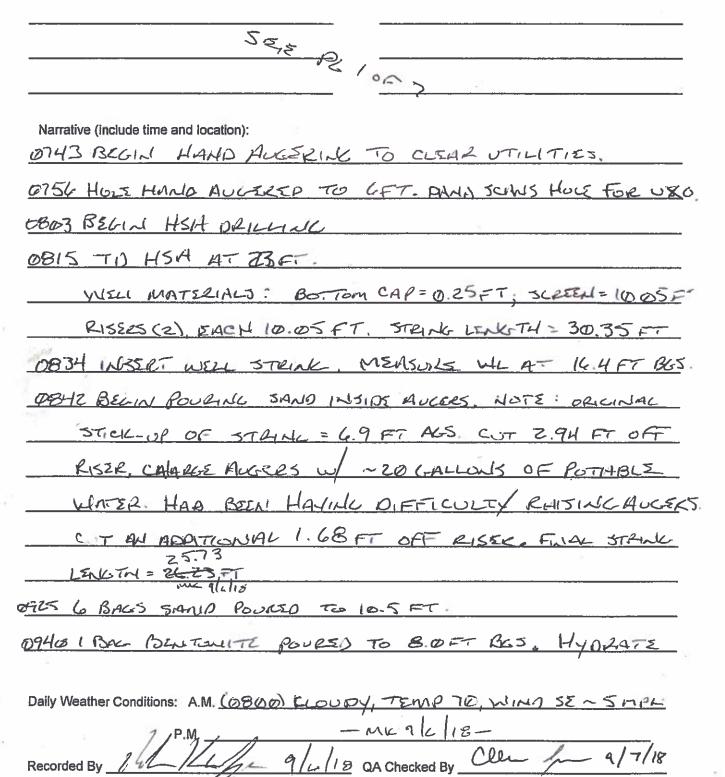
DELIVERY ORDER NO:

Date (mm/dd/yy): 9/6/18

Su M Tu W TR F Sa

PAGE Z OF 7

Task Team Members:



PROJECT NAME: SVAD PEAS SI **DELIVERY ORDER NO:** Date (mm/dd/yy): 9/2/18 PAGE 3 OF 7 Su M Tu W (Th) F Sa Task Team Members: SET PETONZ Narrative (include time and location): WITH ~ 10 GALLON'S POTABLE WATER MIX BATCH OF LEDT CONSISTING OF -B GALLONS PUTABLE WATER 1,94 16 BAL PORTLAND, ~ 15153 BENTONITE POWDER. FINAL STICK-UP OF WELL = 2.43 FT 1013 PUMP GROUT INSIDE AUGERS TO NZET BUS MORE EQUIPMENT OFF WELL SITE. 1025 BELLI MOXING ONTO MUL-67PFAS-01 1035 BEGIN DALLING. NOTE. DANA + CHARLES HAND AUERED THIS HOLE AND CURRED FOR UNO EARLIER 1045 TO HSA AT 23F WELL MATCRIALS BOTTOM CAP = 0.25 SCREEN = 10.05 15T RISCR = 10,04, ZNO RISER 10.07 FT. STRUCKETH=30.4 1118 MEASURE WIL AT 15.5FT BLS OUT H.S.FT OFF RISER. INSER STRILL INSIDE ALCERS Mice Te La Daily Weather Conditions: A.M. 2-9/6/18 QA Checked By Cele for 9/7/18

B-28

PF	OJECT NAME: SVAD PEAS SI DELIVERY ORDER NO:
	te (mm/dd/yy): <u>9/4/18</u> Su M Tu W (Th) F Sa PAGE <u>2/</u> OF <u>7</u> sk Team Members:
	JEIE PG 1 OF-7
Ni	arrative (include time and location):
icz	BECILI POUPIAL SAND.
	O SAMO POURED TO US FT USINIC 674 BAGSI
	TAPE GOT HUNL AT 7.5 FT
120	DO BENTONITE POURED TO 8.0 FT. USINC BAG.
	MYDRATE USWLG ~ 10 GALLON'S POTABLE WATER.
	MIX BATCH DE GROUT USING I BAG POLTLAND, ~106ALOLS
	WOTTER, 1/4 BAG BENTONLITE, ADDITIONAL I. CE FT CUT OFF FISER.
	BUR BENTONITE INSIDE AUGERS. TO -2FT BES.
	MOVE EQUIPMENT OFF SITE TO DECKN. FININ TO OF WELL
	STRINK = 2.50 FT. TAPE RECOVERED W/AAUER.
1235	DRILL CREW BREAKS FOR LUNCH.
-	
	DEILL CREW RETURNS TO SITE.
	INSPECT MW-67PFAS 03. GROUT AT LEOUND SURFACE (UNSURE
	WHEN ORILLERS TOPPED HOLE OFF. MORTAL IN PROTECTIVE
	CASING AT 10.30 FT AGS
Dai	y Weather Conditions: A.M.
Dai	
Rec	orded By 12 10 10 9/4/18 QA Checked By Clen pm 9/7/18

DELIVERY ORDER NO: PROJECT NAME: SUAD PEAS SI Date (mm/dd/yy): _______ Su M Tu W Th F Sa PAGE 5 OF 7 Task Team Members: Ster Perform Narrative (include time and location): 1330 DRILLERS BEGIN DECON. 1410 BEGHT MOUNC EQUIPMENT AND SUPPLIES TO SITE 084 1520 BEGIN SETTING UP ON MW-84PFAS-03. NOTE: EARLIEL IN THE DAY DANA CLEAKED THE AREA AND DANIA AND CHARLES HAND ALLERED FOR UTILITY ALLO UXO CLEMENKE. 1537 BEGW PRILLING ILIO REACH 45 FT. HAVE WATER IN AUGERS, RISHE SLOWAY. LAO NO MEASUREHIBLE WATER AFTER REACHING 30 AND 40 FT BUS. 1630 WATER LEVEL FAIRLY STARLE ~ 42 FT BCS 1232 ADVANCE BORING TO 47 FT BES. MEASURE WIL AT 43.8 FT BGS. RISIAL SLOWLY 1646 ADVANCE BORNE TO 48FT BGS. FUSH PLUC OUT. WE NEARLY STARLE AT 37.5FT BCS Daily Weather Conditions: A.M. (1335) MOSTLY CLOUD, TEMP 71, WIND NE~10 MP -mkg/4/18 -mkg/4/18 QA Checked By Cerl for 9/7/18

DELIVERY ORDER NO: PROJECT NAME: SWAD PEAS SI Date (mm/dd/yy): 1/18 PAGE C OF 7 SuM TUW ThF Sa Task Team Members: JE'E br 252 Narrative (include time and location): 171005ET WELL STRICK W/ BOTTOM NEAL 43 FT BCS 1767 CHARLES OFF SITE FOR DAY AND TO LET DEVELOPMENT AND SHIPPILL SUPPLIES FROM WALMART ~ 10 GALLON'S POTABLE WATER ADDED INSIDE AURERS TO CHIASE SAND 1730SAND POURED TO 29 5 FT USIZE C/2 BIAGS 1740 DENTONITE POULSO ZE 8 FT USING HUBAG. HYDRATED W/ ~ 10 GALLOUIS 1755 KLICKETS + MATECO CREW OFF MELL SITE AFTER SECORIAL. 1802 ARRIVE AT MW-GTPFAS-602. MEASURE TOP OF SEMT HARDENED GROUT AT Z.OFT BGS, MATSCOT CREW SETS PROTECTIVE CASING AND FILLS W/ MORTAR TO ~1.2 FT AGS

My glalis Daily Weather Conditions: A.M. Ceen from 9/7/18 - 9/4/13 QA Checked By ____ Recorded By

PROJECT NAME: SUAD PEAS SI DELIVERY ORDER NO:
Date (mm/dd/yy): <u>9/L/18</u> Su M Tu W Th F Sa PAGE 7_OF 7 Task Team Members:
SEE PL (OF)
<u> ۲</u> ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲ ۲
Narrative (include time and location): 1820 MATTCO CREW OFF WIELL JUTE TO GET MORE WATER
FROM TANK,
1835 AT MW-67PFAS-01. MEASURE TOP OF SEMI-HARP
LEBUT AT 1.6 FT. MATCEOREW SETS ROTSCT. LE
CASING AND FILLS TO I.H FT ALS W/ MORTAR.
1850 CREWS LEAVE SITE FOL DA/ NOTE: DANA LEFT
SITE AT THE END OF ITIS WORK, AROUND MID-DAY
Mic glalie
Daily Weather Conditions: A.M Mu 9/c/18
Daily Weather Conditions: A.MML 9/c/18 Recorded By Makenge 9/6/18 QA Checked By Cle_ for 9/7/18

TASK	TEAM	ACTIVITY	LOG SHE	ET
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PROJECT NAME: SUAO PEAS SI DELIVERY ORDER NO:

Date (mm/dd/yy): Su M	Tu W Th F Sa PAGEOF
Task Team Members:	
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	-
Narrative (include time and location):	
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	18
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	$\langle \rangle$
Daily Weather Conditions: A.M.	
Recorded By	QA Checked By

PROJECT NAME: SUAD PEAS SI **DELIVERY ORDER NO:** Date (mm/dd/yy): 9/6/18 SuMTUW ThF Sa PAGE___OF___ Task Team Members: Charles Spurr Dana Winclow cs alclig . es alche Narrative (include time and location): 0820 MW-84PFAS-02 cleared to 6 bgs w/ hard auger. If Hole moved 12" NW due to EM anomaly in original location. No anomalics down hole 0840 MW- 84PFAS-01 cleared to 6' bgs w/ hand anger. No anomalies down hole. 0915 MW- 84PFAS-03 cleared to 6' bgs w/ hand auger. No anomalies down hole. 1000 MW - 67PFAS-01 cleared to 6' bgs/ hand augor. No anomatics down hole. CS. 9/6/18 Daily Weather Conditions: A.M. Mostly Cloudy P.M. ______ CS 9/6/18 Recorded By Cleu for 9/6/18 QA Checked By M

TASK TEAM ACTIV	/ITY LOG SHEET
PROJECT NAME: SVAO PEAS SI	DELIVERY ORDER NO:
Date (mm/dd/yy): Su M Tu Task Team Members:	WThFSa PAGEOF
51	
Narrative (include time and location):	
	18
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	12
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	N)
Daily Weather Conditions: A.M.	
P.M.	*:
Recorded By	QA Checked By

TASK TEAM ACTIVITY LOG SHEET
PROJECT NAME: SUAO PEAS SI DELIVERY ORDER NO:
Date (mm/dd/yy): 9/7/18 Su M Tu W Th FSa PAGEOF Task Team Members:
M. KLIDZEJS-LEIDOS, P.G. J. CROEL-MATECO, HELPER
C. SPURZ-LEIDOS, GEOL. MK SP/18
6. SWIFT - MATECO, DRILLER
Narrative (include time and location):
0700 M. KLIDZEJS ON SITE. MATERO CREW ON SITE
BUT CALLING INTO A PRANDATORY, MATERO, MONITHLY
HAS TELECONFERENCE.
~ p730 CHARLES ON SITE
~0745 MATECO'S MEETING ENDS. GO TO MW-BHPFAS-03
DRILLERS PREPURE TO MIX GROUT
0836 GROUT POINTED INSIDE AUGERS TO 2 ZET BGS
USING IN 40 GALLONS, MIXED IN TWO BATCHES,
BACH USING I BAG PORTLAND, ~ 1/4 BAC BENTONITE,
And ~ 10 GALLONS WATER
MEASURE STICK-UP OF OLIGINAL WELL STRINK AT LESFT
AGS
1910 MSHASURE WE AT 37.31 FT BCS
MATECO CREW HAS BELIN SETTING UP TO DRILL
ON MW-84PFA3-01, WHICH WAS HAND AUGERED
Daily Weather Conditions: A.M. (0700) CLOUDY, TEMP 59, WIND NE ~ 5-10 MITH
MP.N. (1110) CLOUDY, TEMP CB, MIMB NE ~ 10mm
Recorded By Malthe 9/17/18 QA Checked By Clen from 9/10/18

37.31

PROJECT NAME: SUAD PEAS ST

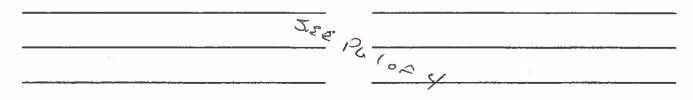
DELIVERY ORDER NO:

Date (mm/dd/yy): _2/7/18

Su M Tu W Th 🖗 Sa

PAGE 2 OF 4

Task Team Members:



Narrative (include time and location): TO 5 FT AND CLEHRED OF UKO VESTEROHY. 0916 BELIN ORILLING MW-84PETAS-01____ 19945 TO HSAS AT 244, SFT BGS. OLIL CLEW LEAVES WELL JUTE FOR SUPPLIES. 1005 SET WELL STRING CONSISTING OF 6.25FT BOTTOM CAP, 10.05 FT SERSEN, AND 4, 10.05 FT RISERS, STRINK LENKTH = 50.5 FT LUT Z. Z.FT OFF RISERS NEW STRING LENGTU 48.3 FT AOVAVRILE BORING TO 48. MEASURE WIL AT 41.7 FT REMORE CUT RESER AND REPLACE W/ NEW SECTION 1100 BECINI POUPrale SAND PACK TO SALE FT USING 4/2 BAGSI 11300 SIGNIO POURED 1141 1 BAG BRILITE POURSO TO 30. DIT, H-1024TED w/ ~ 10 SALLONS WATER RISER STICK-UP = 2.9 FT AKS

Daily Weather Conditions: A.M._ 8/2/18 9/7/18 QA Checked By Ceen from 9/10/18 Recorded By

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TASK	TEAM ACTIVITY LOG SHE	ET
PROJECT NAME: SVAD PE	AS SE DELIV	ERY ORDER NO:
Date (mm/dd/yy): 9 7 18	Su M Tu W Th 🖨 Sa	PAGE 3 OF 4
Task Team Members:		and the second
5.	ER PC (OF	
Narrative (include time and location):		
1145 DEIL CREW BI	RESARD FOR LUNI	ch
1309 ORILL CREW RET	CURHS TO SITE, I	BEEIN MIXING
GROUT		
1330 DRILL CREW O	CC 318 - 18	T I DETER A D
		I WATTE AND
DECON AUCEN	251	2037 D 0000000
14R4 DALL CREW RETUR	WS TO SITE.	
435 BEGIN MIXING 240	to batch of Grout	
441 GROUT PUMPED -	TO 1.8 FT BG5.	TOTAL OF ~60 CALLOND
OF GROUT USED		the second se
1450 MONE RIGON	TO MW- 84PFAS.	02
		WE IN MINI-BHPFAS-6
	ß(<u>_</u> 5.	
1518 TO USA AT 4		areas
		TON CAP, 10.05FT SCREE!
AND H, LO.05FT	- RISERS STRINK LEN	16TH= 500.5FT
Daily Weather Conditions: A.M.	MK 9/5/18	
// P.M.J	12/18	Ceen lon 9/10/18
Recorded By	-9/7/18 QA Checked By	Clen Im 9/10/18

PROJECT NAME: SVAP PEAS 55 DELIVERY ORDER NO:
Date (mm/dd/yy): 9/-/18 Su M Tu W Th (E) Sa PAGE 4 OF 4 Task Team Members:
Stere PC 1 V
Narrative (Include time and location): KNOCK OUT PLUCE MEMORE WE AT 41.1FT BES.
15555 AND POURED TO 35.5 FT BES USINE 5 BACS
1407 1 BAG BENTOMITE POURED TO 32. 5 FT RES AND
HYDRATED W/ 10 GALLONS BOTABLE.
1020 LEEWS MONE TO MUL- 84PFAS-03, THE TOP OF
SEMI-HARDENED GROUT AT ZT ZI FT BLS. SET PROTECTIVE
CASINE IN MORTAR.
1630 CREWS MULLE TO MULL SUPPEAS-01. CUP 0.82 FT OFF
PISEL TO STICK-UP OF 2.26 FT, THE TOP OF
SEMI-HARDENED GROWT AT -3FT-SET PROTECTIVE CASING
Ind martial
1705 CREWS LEAVE SITE BEH FOR ENO OF OAL
MK 2/7/18
Daily Weather Conditions: A.M.
Recorded By M. Kup 9/10/18 Recorded By M. Kup 9/10/18

TASK TEAM ACTIVITY LOG SHEET
PROJECT NAME: SVAO PEAS SI DELIVERY ORDER NO:
Date (mm/dd/yy): 9/8/18 Su M Tu W Th F Sa PAGE OF 3
Task Team Members: M. KLidzETS - LEIdOS, P.C.
6-SWIFT-MATECO, ORIUSE
J. CROEL-MATECO, HELPER
Narrative (include time and location): 01.45 KLidzets and SITE. NOTE: CHARLES TO STAT
AT HUTEL UNITIL DEVELOPMENT EQUIPMENT
ARRIVES FROM RALVIEDNMENTAL EQUIPMENT &
SUPPLY (ZERS) VIA UPS- REVIENENT WAS SUPPOSED
TO BE SHIPPED TO ARRIVE YESTERDAY.
0650 MATICO CREH ON SITE
6700 CRENS ARRIVE AT MN-PFAS-02
0730 BELIN MIXING GROUT
0744 FIRST BATCH TREMMIED RULL 30 FT OF AUGERS MIX ZAW BATCH
USIO HOLE GROATED TO ~ ZFT USING TOTAL OF ~ GOLALLOAS
ADD RUSER SECTION TO BRING HEICHT TO Z.H FT AGS
0824 DELL CLEW WELLYES SITE TO PICK UP FORMS FOR WILL
PADS FROM HARDLARE STORE IN SHUANNA.
BECH PREPARINE FOR DEVELOPMENT. AT FIRE HYDRANT
NESSULATED FOR OUR USE DECON 3 NEW, 5-GALLON HOPE
Daily Weather Conditions: A.M. (6710) CLOUDY, TEMP 39, WNO NE - 10 MPH
Recorded By M. (0940) OVERCAST, TEMP (4, WINDNE AT 10-15 MPH Recorded By Man 9/8/18 QA Checked By Cell for 9/10/18

B-40

PROJECT NAME: SUAD PEAS SI DELIVERY ORDER NO:	
Date (mm/dd/yy): <u>91818</u> Su M Tu W Th F Sa) PAGE <u>-</u> OF <u>3</u> Task Team Members:	
SEE PE 1673	
Narrative (include time and location): BUCKETS AND WOS TO USE FOR DECON, WILL DECON	
PUMP, PUMP COLD. WILT, AND FLOW CELL IS BUCKETS	
FILLED W/: 1) LIQUINOX AND POTABLE WATER, 2) DEIONIZED (OT	Ŧ
WATER AND 3) OF WATER DE WATER PROJUDED	
BY TEST AMERICA.	
2925 DRILL CREW RETURNES TO SITE BEILLS MONTAL	
+ LOADING EQUIPMENT. NOTE THE WIELL FORMS ARE	
3FT > 3FT > 51/2 12 TALL	
1020 GROUT LEVEL IN MINI-BHPFASOZ HAD FALLEN	
TO 12 FT BGS. TOP OFF W/ - 10 GALLONDS CROUT.	
DRILL CREW BECHS MORDING FILLED DRUMS	
1210 CREWS GET SITE FOR LULICH	
1245 M. KLICKETS RETURNS TO SITE!	
310 MATTCO CREW RETURNS.	
1320 ÅRRIDE AT MUL-84PEASOR TO SET PROTECTIVE	
Daily Weather Conditions: A.M	

PROJECT NAME: SVAD PEAS	DELIVERY ORDER NO:
cholis	M TU W Th F Sa PAGE 3 OF 3
<u> </u>	PE 10F3
Narrative (include time and location):	- COLLAF
	RUL CREW TO CONTINUE PICKICK
	TTUEY ARE DONE SETTING
WELL PAD FORM	S AMD ARE LEAVING FOR
1710 KAEIOZETS OFF 5	ITE AFTER FINISHIAK PAINITILE
OF PROTECTIVE C	2451265
	mr 9/8/18
Daily Weather Conditions: A.M	- mrx 9/8/18
Recorded By UNLING	1/8/19QA Checked By Clem for 9/10/18

PROJECT NAME: SVAD PEAS SI

DELIVERY ORDER NO:

Date (mm/dd/yy):	Su M Tu W Th F Sa PAGEOF
Task Team Members:	
Narrative (include time and location):	
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	12-
- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	6
Daily Weather Conditions: A.M.	
P.M	
Recorded By	QA Checked By

PROJECT NAME: SVAD PFAS SI **DELIVERY ORDER NO:** Date (mm/dd/yy): 9/9/18 (Su) M Tu W Th F Sa PAGE OF 5 Task Team Members: M. KLIDZEJS-LEIDOS, P.G. J. CROELE MATEGO, HELPER M x alalie C. SPURE-LEIDOS, GEOL G. SWIFT - MATECO, ORILLER Narrative (include time and location): 0640 M. KLIDZETS and SITE 0455 MATECO CREW ON SITE, CHAILLES ON SITE 0705 ALLUE AT MUL-GTPEHS-63, CALIBRATE MP-ZO. DECUN RUMP + WILL. WTHO OPEN WELL. PID AT TOC = 1.5(MAX) PPUN, SUSTAINEN AT 0.9 ppm. BZ= 0.0 ppm MEASURE WILL AT 12 55FT BTOC, MEASURE TP AT 26.58 FT BTOC (SOFT). WATER COLUMN' = 14.03 × 0.163 (CAL/FT FOR Z-IN WELL) = 2,3 LALLONS OTHE BELINI BILLING SURCINIC USING NEW PISPOSABLE BULLER AND PEAS-FREE COTTON ROPE (FROM RE 45) 0801 ENU BAILING AFTER REMOVING 15 WITCH INSSILT POUR MONSSOON PUMP W NEW TUBINE Daily Weather Conditions: A.M. (0650) CLEAR, TEMP 66, WIND LICHT LVARIABLE P.M. (0905) CLEAK, TEMPLO, WIND NE AT 10-15 MPH 19/9/18 QA Checked By Clen for 9/9/18 Recorded By

TASK TEAM ACTIVITY LOG SHEET
PROJECT NAME: SVAD PEAS SI DELIVERY ORDER NO:
Date (mm/dd/yy): <u>9/9/18</u> Su M Tu W Th F Sa PAGE Z OF <u>5</u> Task Team Members:
SEE PEIOFS
Narrative (include time and location): MEHSURE WIL AT 12.50 FT BTOO
0810 BELINI RUMPING AT HIGHEST LATE
OPRO STOP PUMPILL DETER REMOVIAL 29 GALLONS
LEVANE WELL SITE TO TRANSFEL PURCE WATER
TO PRUM
0837 FETORATO S, TE SET PUMP ~ 2 FT OFF WELL
BOTTOM
MERSURE WIL AT 12.53 FT
RESUME RUMPILIC (SEE DEVELOPMENT LOC FORMS)
NOTE: OUDINE REMOVAL OF FIRST 29 GALLON'S RAISED
AND LOWITED PUMP THRANKOUT THE MATTER COLUMN
AND TURNED THE PUMP OFF AND ON SEVERAL TIMES.
WATER WAS NERY TURALD WINDE LLIKE CLOCOLATE MILK)
UNTIL ~ ZOCALLONIS REMOTED. AFTER ZOGALLONS WATCH
JUST APPEARED HEAVILY STAINED.

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Daily Weather Conditions: A.M. _ 2/9/18 919/18 9/9/18 QA Checked By Cen ly Recorded By 1 m

PROJECT NAME: JUAD PEAS ST **DELIVERY ORDER NO:** Date (mm/dd/yy): 9/9/18 (SU) M TU W Th F Sa PAGE 3 OF 5 Task Team Members: Stop DE l'OR 5 Narrative (include time and location): 140 DIFELOPMENET COMPLETED PARAMETERS STABLE. MIATER TURBIDITY STABLE AROUND IONITUS IS CLEAR 125 AND PUMP, DETON WIT AND FLOW DUSCARD TUBIAK, FUIAL TO = 26.60 FT B.OC 1430 OFF WELL SITE TRANSFER PURCE WATCH 70 ARUM. 1035 ARRIVE AT MW-67PFASE107 OPEN LISUL PIO AT TOC = 0.3-0.5 ppm. BZ = 0.0 ppm WIL AT 17,98 FT BTOC. MEASURE TO AT 25.71 MEASURE 7.73 F. × 0.163 mc 9/9/18 State markson 6 FT STOL 1055 RECTI POMPINE, USILL PUMP THE NEW TORING mx 9/9/18 BOT BEGIN BAILING SUPENCE USAL SET AT NIFT ABSJE NEW BAILSE AND COTTON ROPE 1105 ELO BAILINE AFTER REMOVINE 5 CALLONS. DECONPUTE 1112 REGI, BEGIN PUMPINE AT HICHEST POSSIBLE RATE Daily Weather Conditions: A.M. 2/2/10 Cel for 9/10/18 9/18 QA Checked By Recorded By

	PROJECT NAME: SWAD PFAS ST DELIVERY ORDER NO:
	Date (mm/dd/yy): 99918 (SUM TUW Th F Sa PAGE 9 OF 5 Task Team Members:
	JEE R. 195
	Narrative (include time and location): 1130 STOP PUMPINE AFTER REMOVINE ANGOTHER ZOGHMONES
	EMPTY WATER INTO DRUMS. 1135 RESUME PUMPINIC AT SLOWED RATE W/ RUMP SET
	AT ~ SFT ABOUS VIELL BOTTOM. INITIAL NOTE: DURINGER PUMPING, RAISED + LOWERED RUD TURNED
	TIST, Kuidets APRILS AT MUL-67PFAS-01. C. SPURE
	PEUSLOPMENT TALKS,
	1212 OPENI WILL, PIO AT TOC = 1.2ppm Max, SUSTAINED
	NEAR 0.8 ppm. BZ=0.0 ppm. MEASURE WLAT 17.200 FT BTOC. MEASURE TO AT 25.62. WC= 8.42 × 0.163=
1	1.4 GALLOANS (CASING VOLUME). 228 BEGIN BAILING WINELS DISPOSABLE BHILER AND
	COTTON POR REPE

Daily Weather Conditions: A.M. _____ CS 9/10/12 P.M. (1240) CLEAR, TEMP 70, WIND NE ~ 10mpl Recorded By

PROJECT NAME: STAD PEAS SI DELIVERY ORDER NO:
• Date (mm/dd/yy): <u>9/9/18</u> Task Team Members: Su M Tu W Th F Sa PAGE 5 OF 5
25°E
SER SIONS
Narrative (include time and location): 1243END BALLING AFTER REMOVINGE 5 CALCOND, WATER
15 VERTORGIO; APPEARABLE OF COFFEE. 1302 1250, Becht RUMPICH, AT HICH RATE
1315 STOP PUMANIG TO TRANSFER WATER TO DRUMS
13JORESJME RUMPING. WE BRIDE TO RUMPINE = 17.20
1420 DELELOPMENT COMPLETED. PARAMETERS
STABLE TURBIDITY CLEAR (3.120TUS), PUTE WILT AND
Rump. Oscond Rump, WILT, AND FLOW CSLL,
1504 SEF WELL SUTE.
AT STACING AREA TRANSFER PURCE WATER AND
DECON WATER TO DRUMS
15300 CLEWS OFF SITE FOR DAY. KLIDZEJS LETS
FRESH POTABLE WATCH FOR DECON.
1545 KLOUERS OFF SVIL
-mic alaliz
Daily Weather Conditions: A.M A.G
P.M. (1245) CLEMP, TEMP 71, WIND NE AT 10 MPH
Recorded By M Life . 2/9/18 QA Checked By Clim for 9/10/18

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TASK TEAM ACTIVIT	TY LOG SHEET
PROJECT NAME: 5440 PEAS SI	DELIVERY ORDER NO:
Date (mm/dd/yy): Su M Tu W Task Team Members:	Th F Sa PAGEOF
Narrative (include time and location):	
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	60
Daily Weather Conditions: A.M.	
P.M	
Recorded By (QA Checked By

TASK TEAM ACTIVITY LOG SHEET PROJECT NAME: SVAD PFAS JI DELIVERY ORDER NO: Date (mm/dd/yy): 9/10/18 SuM Tu W Th F Sa PAGE OF 4 Task Team Members: M. KLIDZEJS-LEIDUS, P.C. J CRORL-MATECO, LEUPE C. SPURE-LEIdos GEOR R. G. SWIFT - MATECO, PRIMER Narrative (include time and location): 0630 M. KLICZEJS ON SITE 6647 C. SPURE ON SITE. 0700 MATECU CLEW ON SITE DISCUSS DAY'S NET VITLES. 0710 APLIVE AT MU-BHPFAS-03 TO DEVELOP WELL 1.3 6715 OPEN HELL, PID AT TOC = 0.0 ppm (MDX), SUSTAINED NV allolis AROUND 0.7 pp.m. BZ = (D. Oppm MEASURE WE AT 38.97 FT B.TOC. MEASURE TO AT 46.20 FT- WIC= 7.23 × 0.163 = 1.2 CHLOWS 0722 BSWIN BAILING/SURLING WI NEW DISPUSABLE BAILTR AND COTTON ROPI 6737 END BALLING AFTER REMOVING 5 GALLOUS INSERT MUNISOON RUMP W/ NEW PROACTIVE TUBILE IN WELL, MEASURE WLAT 38.94FT BTOC

0750 BELLI PUMPING AT MAX RATE OF PUMP. 0805 STOP PUMPING AFTIC REMOVENCE ANOTHER 20

Daily Weather Conditions: A.M. (0640) CLEQR, TEMP 48, WILLION ~ 5mpl P.M. LOB25 CLEAL, TEMP 55, WIND NAT < Smpl 9/10/18 QA Checked By_____

PROJECT NAME: SVAO PEAS SI

DELIVERY ORDER NO:

Date (mm/dd/yy): 9/10/18

Su (M) Tu W Th F Sa PAGE_ 2 OF 4

Task Team Members:

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	PC TO	
	1-4	

Narrative (include time and location):

CALLONS, CONLIECT TUBINE TO FLOW CELL 0805 REJUME PUMPINE AT SLOWER RATE AND W/ RUMP SET AT NMID-POINT OF W.C. (SEE DEVELOPMENT RECORD FORMS). NOTE: DURING PUMPING OF 1ST 25 GALLONS, MOYED PUMP TUROUCHONT THE WATER COLUMN AND TURNED THE PUMP OFT , ON SEJECHL TIMES KLIDZETS LEAVES WELL TO GO TO MW-PFAS-61 OBHE OPEN WISH MW-BHPFAS-OI, PIO AT TOC - 1-1 ppm (MAX) SUITANED ~ 0.8ppm, BZ= 0.0ppm. 0850 MEASURE UL AT 43-21 FT BTOL. MEASURE TO AT 49.43 FT BTOC. WE= 6-22 FT × 0 163 = 1.00 6ALLOW (CASING VOLUME 0900 0557 BECIN BAILING SJALINE W NEW DISPOSABLE BAILER MKgliche + Cotral 0917 END BAILING AFTER REMOVING 5 CALLONS INSTRET MORESCOND PUMP WT NEW TUBLE IN

A Ro Ca Daily Weather Conditions: A.M. -4.9/2_9/10/18 QA Checked By_____ Recorded By

Date (mm/dd/yy): <u><u><u>q</u>[10]18</u> Su<u>M</u>u W Th F Sa PAGE <u>3</u> OF <u><u>L</u> Task Team Members: <u>Stree</u> B <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>Stree</u> <u>S</u></u></u>
Narrative (include time and location): MELL MELL MELLAT = 43.22 FT BTOC. 0945BEGIN PUMPING AT MAX RATE. 0025TOP PUMPING AFTER REMOVING 27 CAMOIDS-
Narrative (include time and location): WERE MERSURE WIL AT A 43.22 FT BTOC. 0945BSCIL PUMPILLE AT MAX RATE. 0025TOP PUMPILLE AFTER REMOVING 27 CALLOIDS-
Narrative (include time and location): WERE MERSURE WIL AT # 43.22 FT BTOC. 0945BSCH PUMPING AT MAX RATE. 2002STOP PUMPING AFTER REMOVING 27 CAMOIDS-
MERSURE WLAT # 43.22 FT BTOC. 0945BSGIN PUMPING AT MAX RATE. 0023TOP PUMPING AFTER REMOVING 27 CALLOIDS-
MEASURE WIL AT # 43.22 FT BTOC. 0945BSGIN PUMPING AT MAX RATE. 0023TOP PUMPING AFTER REMOVING 27 CALLOIDS-
0023TOP PUMPHE AFTER REMOVINE 27 CALLOIDS-
CONVISCE TUBILE TO FLOW CILL, WIL- 43.22 FT BTOC
OCHRESOME PUMPINIC AT SLOWER PATE
1733 KUDRETS LEAVES WELL SITE TO GO TO MW-84PFAS-02
HOJS OPEN WELL. PID AT THE = O. Gppn (MAX), SUSTAINED AT
0.1-6.2 ppm. BZ= 0.0 ppm.
MEASURE WIL AT 42.72 FT BTOC, MEASURE TO ATSIGHT BED
WC= 888 FT × 0.163=1.4 CALLONS
May BEOW BALLINGSUEGING USENG NEW DUSPOSABLE BALLER + COTTON RU,
1124 END BAILING AFTER REMOVEDE 5 CALLOUS
SET MORDSOON FIMP of NEW EUB, all in labour
MEASURE WE AT 42.72 TOT BEDC

Daily Weather C	Conditions: A.M.	15	
	/ P.M.	ica_	
Recorded By	Math 9	1. S/1 & QA Checked By	

PROJECT NAME: SVAD PFAS SI

DELIVERY ORDER NO:

10/18 Date (mm/dd/yy): 9

SUGA TU W TH F Sa PAGE 4 OF

Task Team Members:

SZE	
Narrative (include time and location): 1136 BEGIN PUMPINK AT MAX RATE 1144 STOI PUMPINK AT MAX RATE 1444 STOI PUMPINK AT MAX RATE 1444 STOI PUMPINK ATTEL REMOVINK 15 ADDITIONAL CALLONDS, CONDICT FLOW CELL 1155 RESUME PUMPINK I WATCH IN 1200 COLLECT SOLAD IDYS CHARACTERIZATION SHIMPS, SAMULE WAS FORMED AS CRABS FROM EACH SET INTERVAL OF RACH MON. WIELL BORINK. SAMPLE 10: IDXI-SD-PFTA LOOSDI 1235 DEFELOPMENT OF MUS-BHRAS-OZ COMPLETED PARAMETERS STAIRLE WATER IS CLEAR 1715 M. KINZZETS OFF SUTE FOR DAT AFTER PLANAHL LOCKS	
1136 BEGIN PUMPING AT MAX RATE	
144 STOI RUMPING AFTSI REMOVENCE 15 ADDITIONAL	
1155 CONDECT FLOW LELL	
HJB, RESUME PUMPINIC 1	
OF RACH MON. WIELL BORING. SAMPLE 10: IDWI-SO-PFA	
LOOSOI	
1235 DEVELOPMENT OF MW-BHPAS-02 COMPLETED PARAMETERS	
STALISLUE WATER IS CLEAR	
ON WELLS, INSPECTIAL WELLSOTES, CHECKING INVENTORY	
OF DRUMS NOW ALL STAGED IN H-AREA, MOVING EQUIPMENT	
AND COOLERS TO USHEE'S BLOG. NOTE: CHARLES BROUCHT	
SAMPLES CONSECTED TO DATE TO FECEX.	
mid-9/10/18	
Daily Weather Conditions: A.M	
Recorded By Malan (1305) CLEAR, TEMP 72, WIND NW ~ 5mps	
Recorded By Markan 9/10/18 QA Checked By	

HTRW DRILLING LOG							C	DISTRICT: LOWISYILLE												HOLE NUMBER							
1. COMPANY NAME: 2. DRILL SUB										. SUBI	CONTRACTOR: MATECO							ſ		1_0F							
3. PROJECT: SNAP PEAS SI 5. NAME OF DRILLER: CARY SWIFT													4. LOCATION: SVAO SITE 084														
5. NAME (OF DF		-		\checkmark	54	411																NE		5		
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18. GEOTE								DISTU	RBED				ISTUR					UMBE					~/	A			
20. SAMPLE!	SFOR	CHEMI	CAL AN	ALYSIS				VOC			META	-		OTHE	R (SPE	CIFY)		OTHER (SPECIFY) OT				HER (SF	ECIFY)		21. TO RECOV	TAL COR	14
22. DISPOSI		FHOL	Ξ				BAC	KFILLE	>	MON		IG WEL	-	OTHE	R (SPË	CIFY)	23.	SIGNAT	URE O	INSPE	CTOR	Ń	11 Vum				
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PROJECT: SNAP PEAS 35 . INSPECTOR M. KLIGZETS SHEET 2 OF G LEP: DOT DECOMPTION OF MATTERNAL () DECOMPTION OF MAT
(1) (1) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2
SANNA (SP), FINE GRAINED, WELL SOLUTION, CODEL DARK JENDING BROWN (IOYR 4/K) SC. MOIST HSA ORLUNK HSA ORLUNK HSA ORLUNK HSA ORLUNK
РІДОУЕ Суттика суттика состика 9

1		итр W П	ING LOG			HOLE NUMBER MUC 84	PELAS
PROJE	ст: ЗЛ	AD PFAS SE .	NSPECTOR M	Keidz	EIS	SHEET 3 OF 4	11113
ELEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	 HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G)	
PROJECT:		TAME AS ASSOV	PID OVIA- CUTTINGS = 6. OPPN			HOLE NUMBER MUI - 84/-AS	

I	HTRW DRIL	INGLOG			HOLE NUMBER MUS-8-1PF	2545
PROJECT: SVA		INSPECTOR M	Keidz	EIS	SHEET 4 OF 4	.142
ELEV. DEPTH (A) (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE	GEOTECH	ANALYTICAL SAMPLE NO.	REMARKS (G)	
22-1 22-1 22-1 22-1 22-1 22-1 22-1 22-1	SAME AS ABOUTE	RESULTS	OR CORE BOX			

		HTRW DR					HOLE NUMBER MW-84
	T: 544		IN	SPECTOR M	Kidz		SHEET 5 OF 6
LEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)		HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G)
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The second	5. 6.	FAS SI	1	I			HOLE NUMBER MUS-81974-5

1		HTRWDE	AILLING LOG			HOLE NUMBER MWBHFFAS
PROJEC	T: <vad< td=""><td>PFAS SI .</td><td>INSPECTOR M</td><td>Kidz</td><td>EIS</td><td>SHEET 6 OF 4</td></vad<>	PFAS SI .	INSPECTOR M	Kidz	EIS	SHEET 6 OF 4
ELEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G) - 너 (
						DRICL RIC CHIATTERS DRILLICC AT 42 FT
						ADVANCE BORING UT
L	4 28 48 49 41 41 41 41 41 41 41 41 41 41 41 41 41					TD = 48 FT - 48
	SUAD F	PFAS SI				HOLE NUMBER MUL BURFAS-0

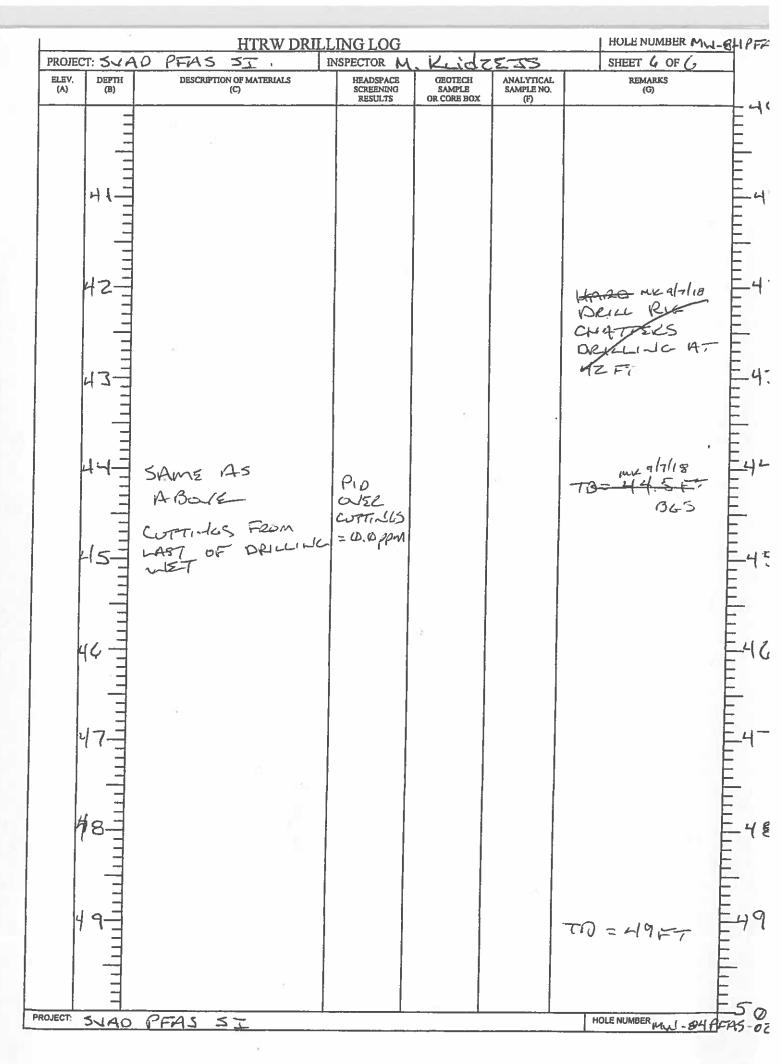
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1. COMPANY	Y NAME:	L	٤١٥	do	5					2	DRILL	SUBO	ONTR	АСТО		44-	120	-0						35		
3. PROJECT:	5	LEIDOS SUAD PEAS SI RILLER: GARY SWIFT EBOFDRILLING - CIELA OD 41/21/ 10,5 OUTPMENT ISNCTH HSAS WOD, 41/212 10 BUNET BIT NOODZA ALUC INTO ROCK N/A TH OF HOLE 49.3 FT												OCAT	_				2	172	-	08	gr	ł		
5. NAME OF	DRILLEF	: 6	AR		5,	~							6, N	IANUF	ACTU					DRILL:						
7. SIZES AND T	TYPES OF 3 EQUIPM	DRILLIN	а <u>-</u>	.2	<u>le .</u>	~ (TU	D HS	<u>ч7</u>	21-1	10	, S7	/	8. H	OLE L	OCAT	ON:										
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14. TOTAL DI	EPTH OF	HOLE			5			FT	-				17. (DTHE	RWAT	ER LE	VEL M	EASUR	REMEN	ITS (SF	PECIF	Y):			-	
18. GEOTECH													RBED		19. T(DTAL I	NUMBI	ER OF	CORE	BOXE	5	~	11	۹		
20. SAMPLES FO												-	OTHE	R (SPE	CIFY)		OTHER	(SPECI	FY)	σ	THER (n	21. TO RECO		5/2
22. DISPOSITIO											G WELL	1	отне	R (SPE	CIFY)	23	SIGNA	TUREC	FINSP	ECTOR	10	ÍĽ.	Ľ	11.	·	
LOCATIO	IURDEN THICKNESS > H9 FT DRILLED INTO ROCK N/A DEPTH OF HOLE H9.3 FT CHNICAL SAMPLES DISTURBED FOR CHEMICAL ANALYSIS VOC ME TON OF HOLE BACKFILLED MONITO																	SC	ALE:				7	11		
	LEIDOS SUAD PEAS SI DRILLER: GARM SUIFT VPEB OF DRILLING - C'LE W OD 41/21. IEQUIPMENT LENCTH HSAS (WOD, 41/2 W ID BUNE WOODEN PLUC RDEN THICKNESS > 49 FT RILLED INTO ROCK M/A EPTH OF HOLE 49.3 FT INICAL SAMPLES DISTURBED RICHEMICAL ANALYSIS VOC							Τ	T	T	Γ			Τ	Τ		T	1		T		Т	Т			
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ELEV (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G)
		U. O-HAFT! SANID (SP). FIJE GRAIJED, WELL SORTED, LOOSE, YELLOWISH BROW (10YR S(H) DAMP				
	SVAO	PFAS SI				HOLE NUMBER MUHI-BH PFAS-

1		ופת שתש	LLING LOG			HOLE NUMBER MUL-841PF
PROJEC	T: SUAC	P PFAS SI	INSPECTOR M	Keidz	ETS	SHEET 3 OF &
ELEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G)
		SAWE AS ABOVE	PiD OXEL CUTTINGS = O. OYPU			

1				UTDW DE	тт т	NGLOG				1 HOLE NUMBEI	z m. (- 851)	PA3-6
ŀ	PROJEC	T: JUE	O PEA			NSPECTOR M	Kidz	EIS		SHEET 4 OF		11-0 -
	ELEV. (A)	DEPTH (B)		EPTION OF MATERIALS (C)			GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO.	380	REMARKS (G)		
	ELEV. (A)	DEPTH		EPTION OF MATERIALS	IP		CEUTECH SAMPLE OR CORE BOX			REMARKS		
		29-1									بايبييا	-29 -
PR	OJECT:		0-4 <							IOLE NUMBER		-30
		ONDE	PFAS	31						OLE NUMBER MSL	<u>R497</u> 45	5-02

		T	HTRW DRIL			177	HOLE NUMBER	RUPEAS
PROJEC		1		INSPECTOR M	Kidz	223	SHEET S OF 4	-0-11-1-
ELEV. (A)	DEPTH (B)	DESCRIPTION OF	MATERIALS	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G)	
	32 32 33 35 340 34 37 38 39 31 31 32 32 32 33 34 37 37 38 39 39 39 39 39 39 39 39 39 39 39 39 39	SAME AS MOIST	ABente	Pip Oviek Cuttrukss = 0.0ppin			HOLE NUMBER MUL-BAPP	The second secon

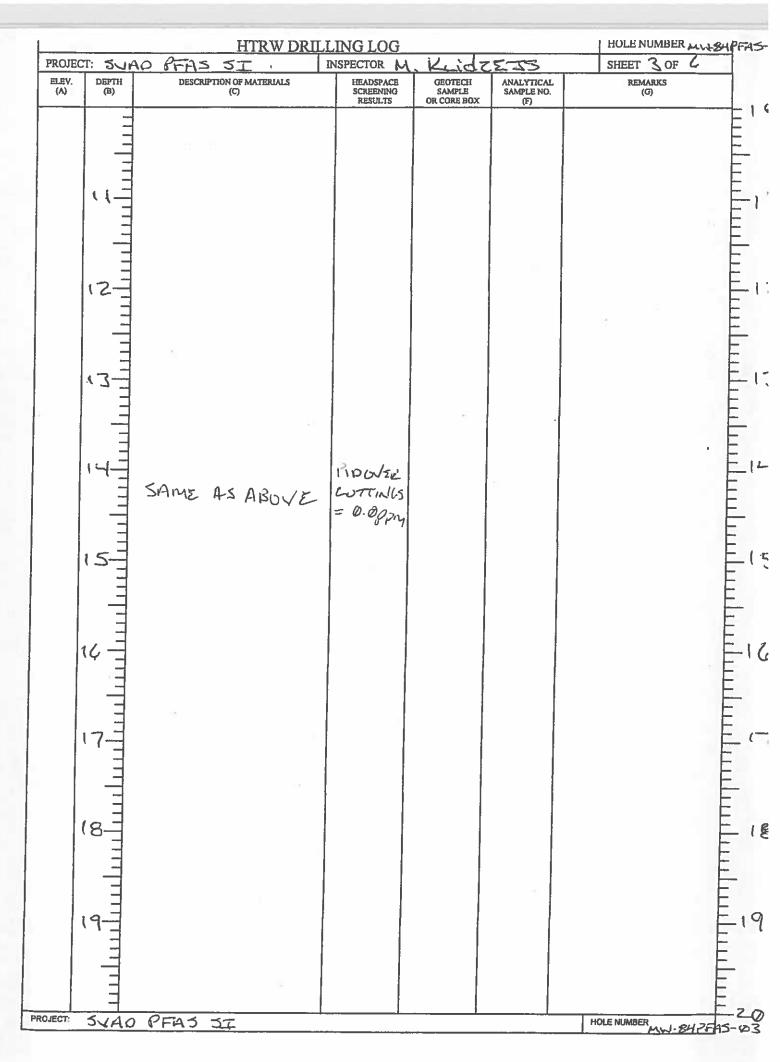


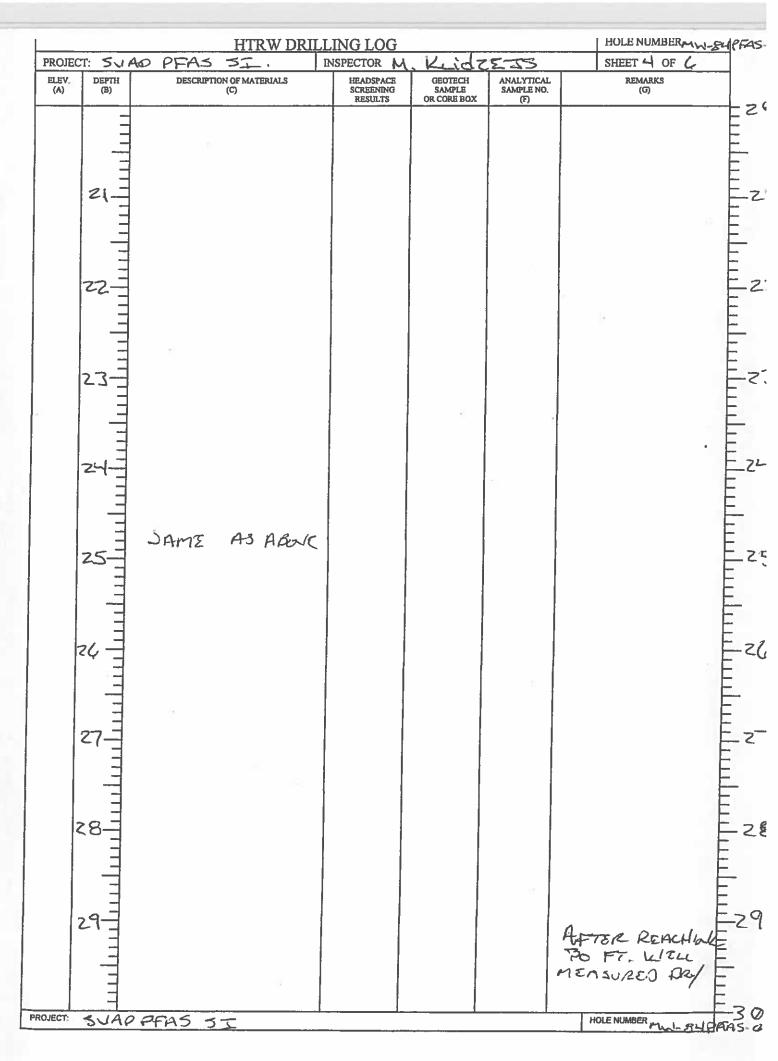
HTF	W	DRI	LLI	NG	LO	G					DI	STRIC	^{re} د	۰۵	ત્ર	\sim i	24	ςΈ.							10LE N		
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3. PRO.	IECT:	34	IME 2. DR SVAO PEAS ST SURO PEAS ST LLER: GARY SWIFT SOF DRILLING - 6 1/2 INI GD, 41/2 INI IO JOD, 41/2 INI GD, 41/2 INI IO JOD, 41/2 INI GD, 41-INI LENGTH T BIT WILLING IN THICKNESS N THICKNESS SOF DRILLING INTHICKNESS SIGNAL SOF DRILLING INTHICKNESS SOF DRILLING INTHICKNESS SOF DRILLING INTHICKNESS SOF DRILLING INTHICKNESS SOF DRILLING INTO ROCK NIA HOF HOLE HOF HOLE INTO ROCK INTO ROCK INTO ROCK INTO ROCK INTO ROCK INTO ROCK INTO ROCK <t< td=""><td>4. LC</td><td>CATIO</td><td>DN:</td><td>SY</td><td>AC</td><td>2</td><td>517</td><td>ε</td><td>08</td><td>34</td><td></td><td></td><td></td><td></td></t<>											4. LC	CATIO	DN:	SY	AC	2	517	ε	08	34				
5. NAMI	OF D	RILLER	ME: LEIDOS SVAD PEAS SE LER: CARY SWIFT SOF DRILLING -C'ZINGO, H'ZINJIOS IPPMENT - LENCTH HSAS JOO, HZUJIO, H-INILENCTH TO, HZUJIO, HSAS JOO, HZUJIO, HAINICH AUGORFHOLE HOLE HOLE BACKFILLED MONITORING W											6. M	ANUF/	CTUR	ERS D	ESIGN	IATION	OF DI	RILL	ċ٨	Ξ	5	5		
			LEIDOS 2. DR 2. DR 2										-			CATIO								÷			
-8	14	, کہ	20	-SIDOS AD PEAS SI CARY SWIFT CARY SWIFT RILLING - C 1/2 INI GD, 4 1/2 INI IOS T, LENSCITH HSAS D, 41/2 INI O, 4-INI LENGTH BIT WI WOODEN PLUE CKNESS > L(8 FT TO ROCK N/A HOLE 48 FT MPLES DISTURBED UN ALAMALYSIS VOC METALS BACKFILLED MONITORING WA X										9.51	IRFAC	ERE	VATIO	N									
ßı		ET	ME: LEIDOS SVAO PEAS SE LLER: GARY SWIFT SOFDRILLING - C'ZINIGO, M'ZINIO UPMENT LENCTH HSA3 JOO, 4721, JO, H-INI LENGTH TO, H-INI LE													_											
		AME: LEIDOS SVAOPFASSI ARLER: GARY SUIFT ARLER: GARY SUIFT DES OF DRILLING GUIPMENT LENGTH HSAS INCO, 412 IN IO, 41-IN LENGTH ET BIT WILLISCORP PLUG DEN THICKNESS > L(8 FT LLED INTO ROCK N/A ITH OF HOLE HCAL SAMPLES DISTURBED ACHEMICAL ANALYSIS VOC METALS DISTURBED MONITORING DEP HOLE BACKFILLED MONITORING TH OF HOLE BACKFILLED MONITORING												10, E	ATES	TARTI	ED;	<u>۹(</u>	41	18	11, D	ATE C	OMPLI	ETED:	91	61	ß
12. OVE	RØURI	RILLED INTO ROCK N/A EPTH OF HOLE 48 FT HNICAL SAMPLES DISTURBED U											_	15, 0	EPTH	GROU	INDWA	TER 6	NCOU	NTERE	ED:	ానశ	E	LC	56		
13. DEP	THOR	LLED	NTO R	оск	_		N	IA						16. D	EPTH	TO W	ATER /	AND EI		D TIME	AFTE	R DRII	LING	COMP	LETED	:	
14. TOT.	AL DEF	DEPTH OF HOLE 48 FT												17. C	THER	WATE	RLEV	el. Me		MENT	'S (SPE	ECIFY)	;				
18. GEO	AL DEPTH OF HOLE 48 FT											UND	STUR	BED		19. TO	TAL N	UMBEI	R OF C	ORE B	OXES		h	1/1	1		
20. SAMP	les for	ES FOR CHEMICAL ANALYSIS VOC METALS											-	OTHER	(SPEC	IFY)	C	THER (SPECIF	0	OTh	ier (sp	ECIFY)		21. TOTA		
22. DISPC	BITION	ITTION OF HOLE BACKFILLED MONITORING V										WELL		OTHER	(SPEC	IFY)	23.	BIGNAT	URE OF	INSPEC	TOR	1/1		/	1/1		74
		- ×												-	_							V VL	-#		//~		
	TION	NAME LSIDOS SVAD PEAS SE DRILLER: GARY SWIFT PESOF DRILLING EQUIPMENT LENSCITH HSAS INCO, 472 IN 10, 4-11 LENGTH ET BIT WILLSODDEN PLUE DEN THICKNESS > L(8 FT NICAL SAMPLES DISTURBED R CHEMICAL ANALYSIS VOC MET DOF HOLE DOF HOLE DOF HOLE DOF HOLE MONITOR CONT																	SCA	\LE:							
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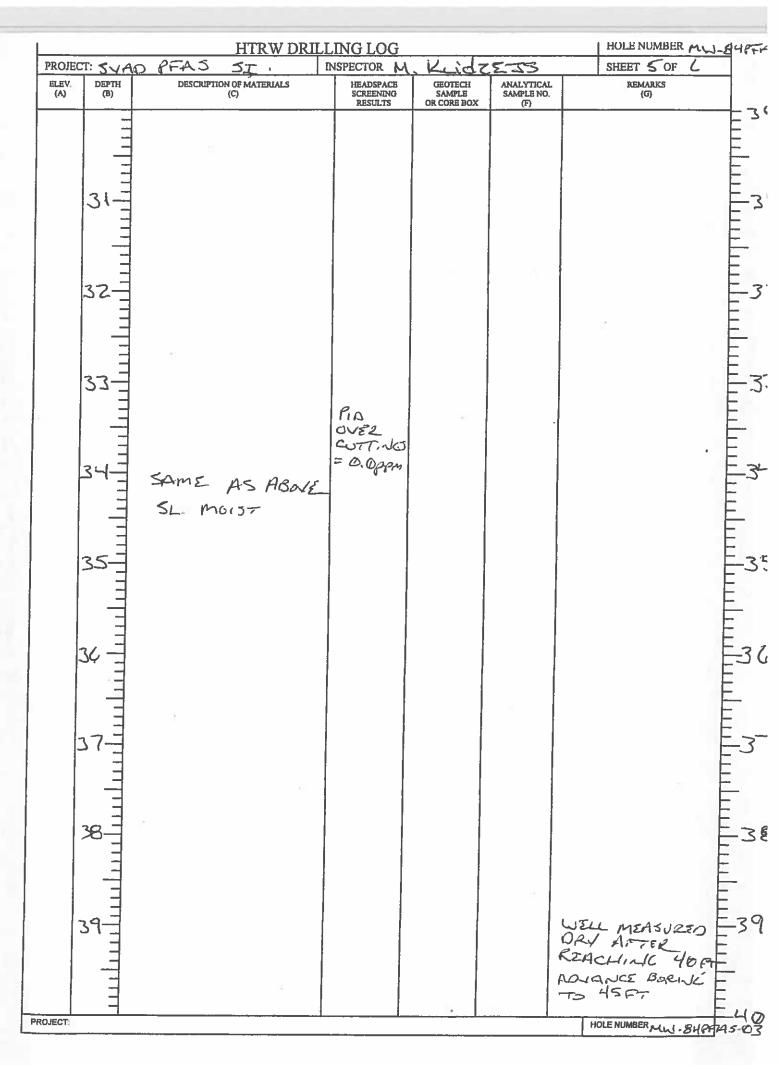
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PROFECT	T. < 1.4	HTRWDRIL	LING LOG	Keida		HOLE NUMBER MU-84 SHEET 2_OF 6	IPFAS
ELEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO.	REMARKS (G)	
PROJECT:		D.D-HBET. SAND (SP). FINE GERINED (PREDOM) WI SOME MEDGERAND MOD. WIELL SORTED LOOSE. DANK YELLOWIGHI BBOWN (10 YR HIC). V. MOIST PFAS SI	4			HAND ALKER TO S.O FT FOR UTILITY CLEMINANCE DRILL USING HSA	

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		HTRW DRIL	INGLOG			HOLE NUMBER MLI-84/6	FAS
PRO.	ECT: SNA		INSPECTOR M	Keidz	ETS	SHEET GOF C	
ELEV (A)	DEPTH	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO.	REMARKS (G)	11 -
ELEV			SCREENING RESULTS	SAMPLE	SAMPLE NO.	AFTER ADVANCIAL TO 45, MENSURE VIL AT 42FT. AOVANCE BORINK TO 47 FT MEASURE WIL AT 43.8FT, RISING SLOULY ADVANCE BORINK TO 48 FT PUSH OUT PLUC MEASURE WIL AT 37.5 FT BGS	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4
PROJECT		PEAS ST				HOLENIHARER	0
FROJEGI	SVAD	PFAS SI				HOLE NUMBER MUL BUPPAS-0	3

HTR	ND	RI		NG	LC)G		,			Di	STRIC	r: L		μ		L	.٤_	•						HOLE		
1. COMPA	NY NA	ME:	L	٤١٥	10	5					2.	DRILL	SUBC	ONTRA	CTO		14	τE	cد	>					8HEET	1_0	<u>"Ч</u>
3. PROJEC	СТ:	5	A	LEIdos AD PFAS SI GARY SYLIFT HILDNG - C'/2IN OD H T SFT LENCTH HS OD H //2IN IO H-IN BIT W WOGDEN P CKNESS > Z3FT TO ROCK NI/A HOLE ZJFT MPLES DISTURBED NI ANALYSIS VOC BACKFELED M								4. L0	CAT	ON:	5	A		51-	τε	<u> </u>	.7				1		
5. NAME O			ME: LER: LEIGOS SNAD PFAS SI LER: GARY SYLIFT SOFDRULING -C'/2IN OD, H APMENT SFT LENETH ADD, H'/2IN IO, H-IN ET BIT W/ WOGDER M NTHICKNESS > 23FT ED INTO ROCK H/A HOF HOLE ZJFT HOLE BACKFRLED I							_	6. M	ANUF	ACTUR								- 5	55					
7. SIZES AN	D TYPE	SOFD	RILLIN		-6	PFAS SI V SXLIFT C'/2IN 00, 4/2 SFT LENCTH HSH V/2N 10, H-IN L W/ WOGDEN Phy > 23FT N/A ZJFT DISTURBED VOC M BACKFILLED MONT				10				OCATIO													
					e				_	16-7	74																
					SS 723FT DCK HA ZJFT							9.50	JRIFA	CE ELE	VATIO	AN: 											
		DEN THICKNESS > Z 3 FT								10. C	ATE	STARTI	ED:	91	41	8	11.0	DATE	:OMPI	LETED	r 9	4	18				
12. OVERE	BURDE	IN THI	CKNE	SS			> z	-3:	F-7					15. C	EPTH	GROU	INDW/	ATER I	INCOL	INTER	ED:	ulr					
13. Depth	IDRILL	RILLED INTO ROCK RIA											и то w.						er dri 373			PLETE	D:				
14. TOTAL	URDEN THICKNESS > 2.3 FT DRILLED INTO ROCK N/A DEPTH OF HOLE 2.3 FT CHNICAL SAMPLES DISTURBED IFOR CHEMICAL ANALYSIS VOC											R WATE															
18. GEOTE	CHNIC	DRILLED INTO ROCK HALA DEPTH OF HOLE ZJFT CHNICAL SAMPLES DISTURBED FOR CHEMICAL ANALYSIS VOC						1	UND	STUR	BED		19. TO	TAL N	UMBE	R OF C	ORE	BOXES		え	1A						
		OR CHEMICAL ANALYSIS VOC						META	.8		OTHE	I (SPEI	XFY)		THER	SPECIF	n	01	HER (S	PECIFY	2		TAL CO				
22. DISPOSI		FOR CHEMICAL ANALYSIS VOC					MON	TORIN	G WELL	+	OTHER	(SPE	HFY)	21	SIGNAT	UREOF	INSPE	CTOR	.//	F/	1	RECOV	ERY P	~ 1945			
		track	AICAL ANALYSIS VOC					×											ľh	1L	μ	-///	2	_			
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			VILLING LOG			HOLE NUMBER MUJ-47
	CT: 5-14	to PFAS SIG.	INSPECTOR M	Kidz	EIS	SHEET Z OF L
ELEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G)
		D.D-23FT: SAND (SP), TRAC FINISS. FINE CRAINED, WILL SORTED LOOSE DARK CRAY (10 YR MON BROWN (10 YR M BY ~ GFT	RESULTS			HAND BUCER TO CLEAR UTILITIES HSA PRIMUMC
ECT: 🚽	SUAD	PEAS SI				HOLE NUMBER MW-67PFAS-6

OJECT: 5	AO PEAS SI	INSPECTOR M	Kidz	575	HOLE NUMBER	-MW-
LEV. DEP (A) (B		HEADSPACE	GEOTECH SAMPLE	ANALYTICAL SAMPLE NO.	REMARKS (G)	
14 12 13 14 15 14 14 15 14 14 15 14 14 15	GRADES TO YELLOWISH BROWS (10/A 5/4) ~ 15F	RESULTS	OR CORE BOX		HOLE NUMBER	7795953

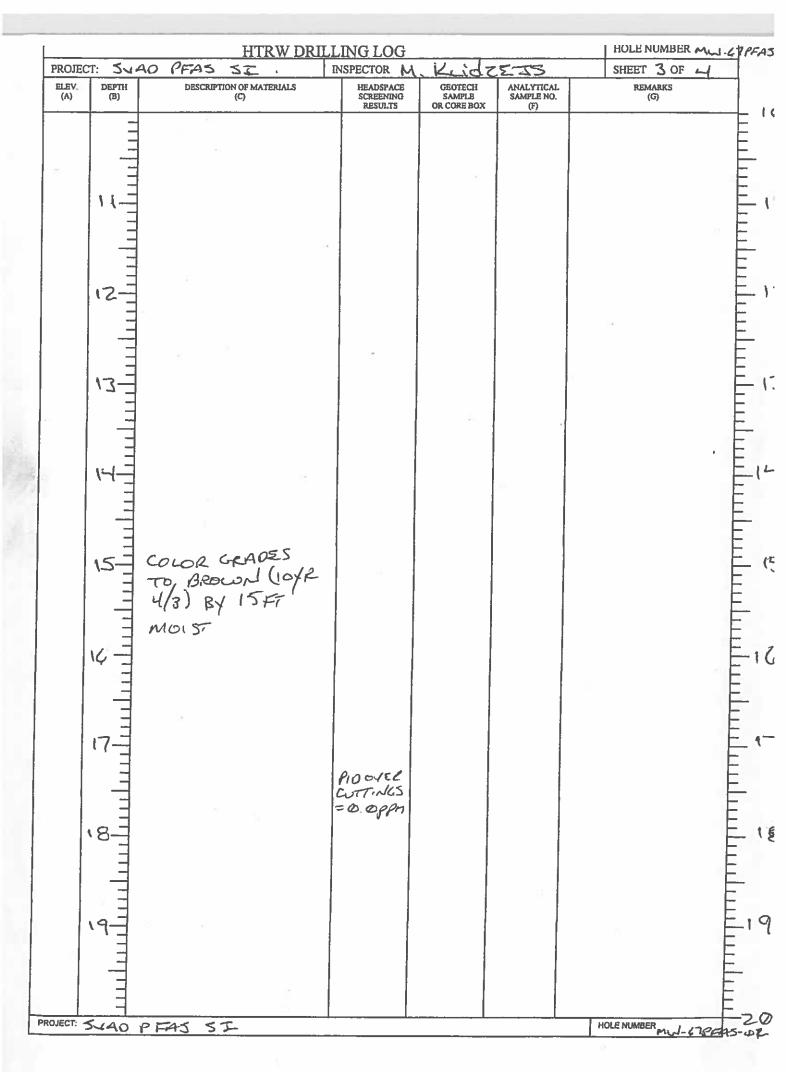
ROJECT: SUAD PEAS ST. INSPECTOR M. KLIDZETS SHEET LI OF 4			HIKW DKIL	LING LOG			HOLE NUMBER MUN-67 P
21- 24- 23- 24- 25- 24- 25- 26- 27- 28- 28- 28- 28- 28- 28- 28- 28	PROJEC	T: 54	1		Kidz	EIS	
21- SAWNE AS ABOX 22- 23- 23- 24- 24- 25- 24- 25- 24- 27- 28- 28- 28- 28- 28- 28- 28- 28- 28- 28	ELEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH	ANALYTICAL SAMPLE NO.	(G)
HOLE NUMBER MULL & 78E 45-60		23 23 24 27 28 111111111111111111111111111111111	0	RESULTS	OR CORE BOX		70:23F7

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3. PROJI	A PROJECT: SNAD PEAS SI							4. L	OCAT	ON:	5	IA	Ъ	55	TE	01	57									
5. NAME	SIZES AND TYPES OF DRILLING -6 1/2 1-1 00, 41/2 1-1 10, 57								6. N	IANUF	ACTUR	RERS I	DESIG	NATIO	N OF D	RILL:	cr	۶.	5	5						
7. SIZES A AND BAM	ND TY YUNG I	PES OF EQUIPM	DRILLIN ENT	16		- 1/2 5. V	ارم ا ارم ا	ം പ	<u>,</u> 4	'7z	1	10,	5=7	а.н	IOLE L	OCATI	ON:									C.
- 3%		0 D	्र म	12	الم	10	4-1	2	Enl	LTH	ßı	112	7	9.5	URFA	ce ele	VATIO	DN:								
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13. DEPT	-						<u>> z</u>		5 	/				+					•					COM	PLETED	
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14. TOTA	L DEF	יז א סא	HOLE	Б		Z	3.	SF	τ					17. (OTHE	RWATE	ER LEN	VEL ME	ASUR	EMENT	'S (SP	ECIFY):			
18. GEOT	ECHI	NCAL	SAMPL	ES				DISTU	RBED			UND	ISTU	røed		19. TC	TAL N	UMBE	R OF C	ORE E	OXES		N	A		
20. SAMPL	es foi	RCHEM	CAL AN	ALYSIS	1	+	1	VOC	_		META		+	OTHE	R (SPE	(IFY)	+ •	OTHER **	SPECIF	m	στ	HER (SI	PECIFY		21. TOTA	L CORE
22. DISPOS	NOLT	OF HOL	E	40.			BAC		>	MON		ig well	-	OTHE	R (SPEC	1FY)	22.	SIGNAT	URE OF	⁷ INSPEC	TOR	¥U.		Ż		
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ELEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G)
		0.0 - 23 FT: SAND (SP) FINE GRAINED, MELL SORTEP, LODSE, VER/DAILY GRA/ (10/R 3/1) MOIST.		2		LI THOLOGY LOGBED FROM AUGER CUTTURS HAND AUGER TO G FT TO CLEAR UTILITIES
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	7 7 8	5	Pio GIIL CUTTINICS = O. Oppm			
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OJECT:	5440	PFAS SI	N			HOLE NUMBER MW-67PFA

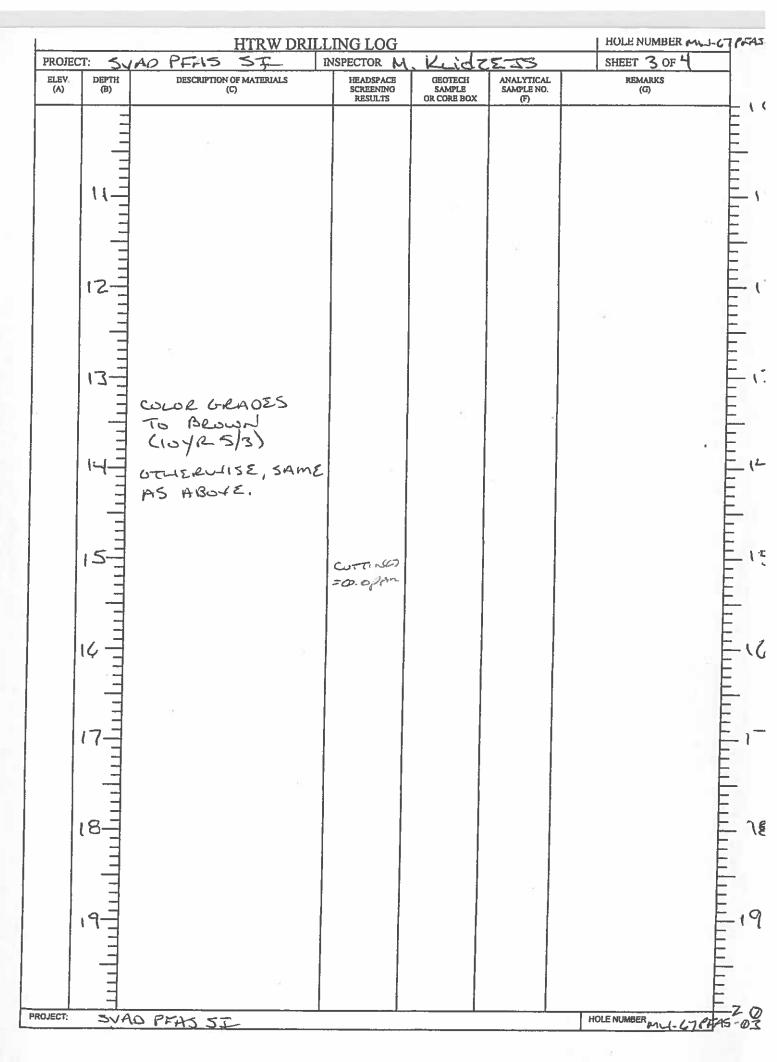
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			LLING LOG			HOLE NUMBER MW-C
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ELEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G)
ELEV. (A) 2 2	DEPTH	DESCRIPTION OF MATERIALS	HEADSPACE	GEOTECH	ANALYTICAL SAMPLE NO.	REMARKS
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	=	PFAS ST				HOLE NUMBER NSU- 67 PERS-

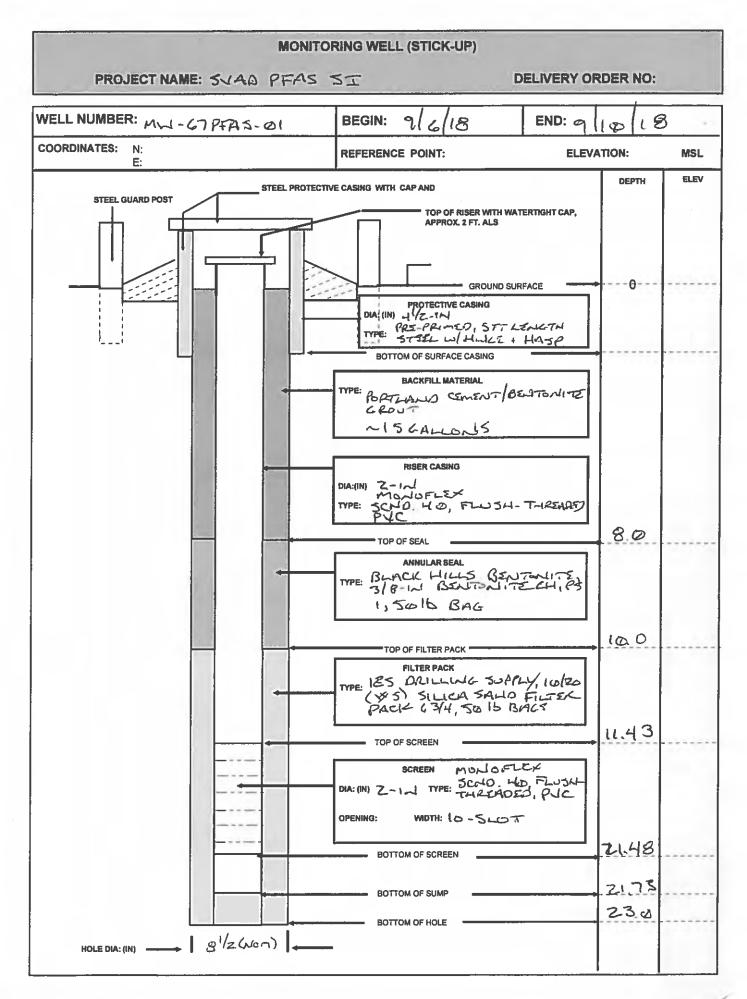
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1. COM	PANY I	IAME:	L	210	10	5					2.	DRILL	SUBC	CONTRACTOR: MATECO						SHEET	<u> </u>	<u>4</u>					
3. PROJ	ECT:	5	JA	0	P	FA	2	S	I					4, L(CATI	ON:	5	IA	2	Su	īΣ	Ø	67	•			
5. NAME	OFD	RILLER	: G4	Ry	15		FT	-						6. M	ANUF/	-			ATION						-		
5. NAME 7. SIZES / AND SAM	NO TY	es of I	DRILLIN	• [- 6 ¹	121	AC	אַיע אלא	-172 \	int	10,	5F	T	8. H		CATIO	DN:										
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12. OVE	ROURI	DEN TH	IICKNE	SS		>	· 2	7						15. C	EPTH	GROU	INDW/	TER E	NCOUN		D: F	(A.S		-11	ET (FT	Cur BL	T,J
13. DEP	TH DR	LLED I	NTO R	OCK			N																		PLETE		
14. TOT/	AL DEF	TH OF	HOLE			2	-	=7						17. 0	THER	WATE	RLEV	el Me	ASURE	MENT	S (SPE	CIFY	c				
IB. GEO	TECH	IICAL S	SAMPL	ES				DISTUR	IBED			UND	ISTUR	BED	•	19. TO	TAL N	UMBEF	OF CO	ORE B	OXES	ŀ	4/2	4			
id. Sampi	es foi	R CHEMI	CAL AN	ALYSIS		\mp	١	/00			METAI	8	-	отнея	t (SPEC	IFY)	(THER (PECIFY	,	OTh	ER (8/	ECIFY		21. TO	TAL CO	RE LA
12. DISPO	BITION	OFHOU	Ę			+	BACI	CFRLLED		MON	-	o well		OTHER (SPECIFY) 23. SIGNATURE OF INSPECTOR		Z	61	4	<u>'0'</u> \								
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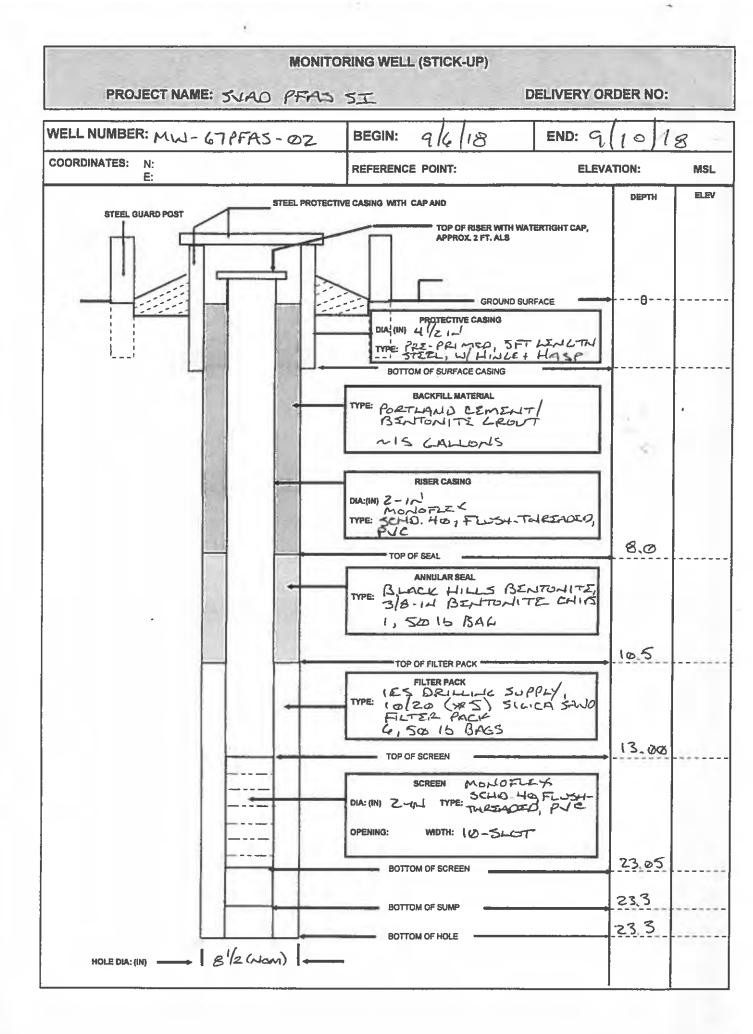
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	T		NSPECTOR M	Kidz	1	SHEET Z OF 4
ELEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G)
	v viiliiliiliiliiliiliilii	O.O-27 FT: SAND (SP) SOME FINES, FINE CRAINED, WELL SORTED LOOSE, BLACK (10 YR 2(1) MOIST	Cuttinda O. Oppm			HAND ALLER TO SET TO CLEAR UTILITIES LITHOLOGY LOGGEO FROM AUGRER CUTTINICS.
		GRADES TO DACK GRAYISH BROWH (104R3/2)				HSA PRILLIAL
	7 7 8 8		WTTINGS = 6.0 PPM			
DJECT:		PFAS SI				HOLE NUMBER MW-67PF85-0

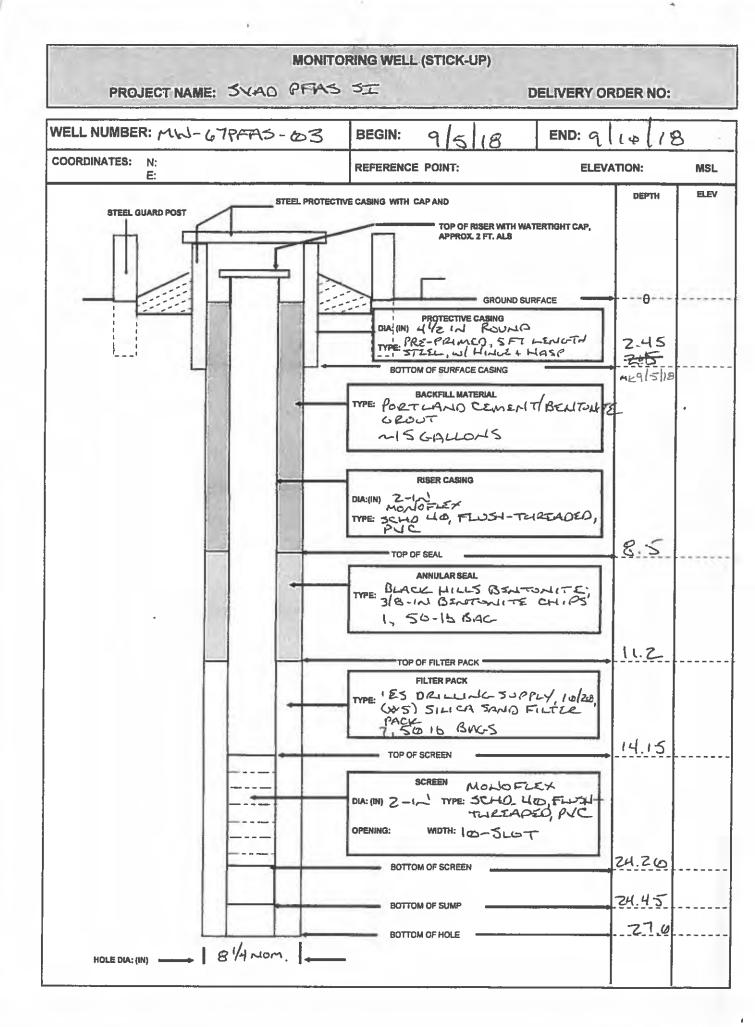


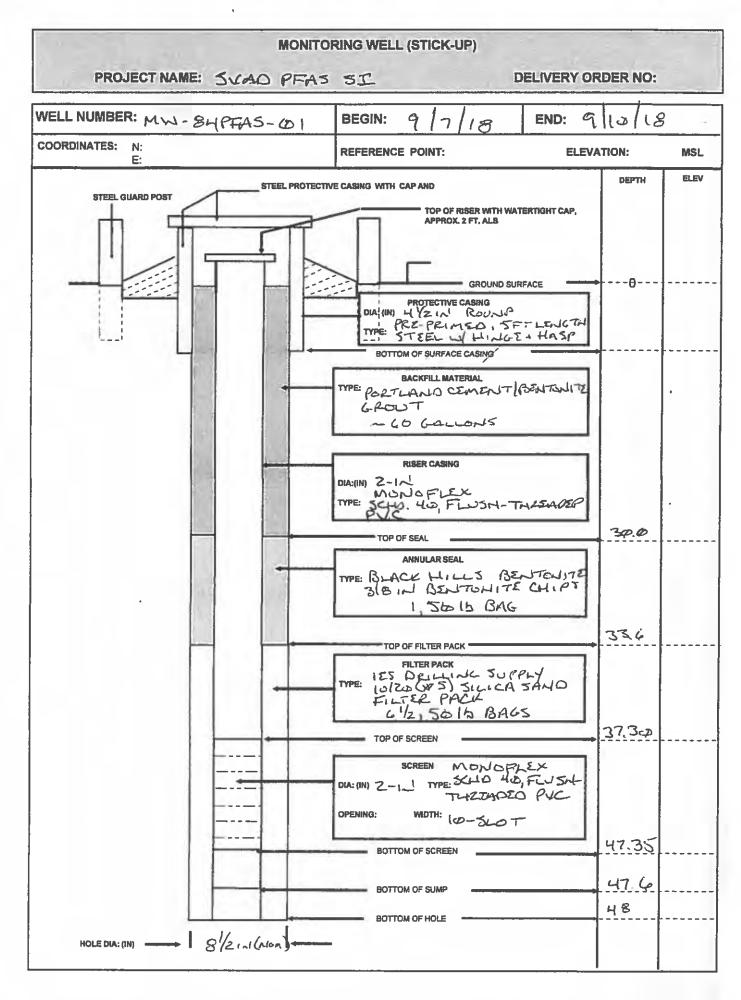
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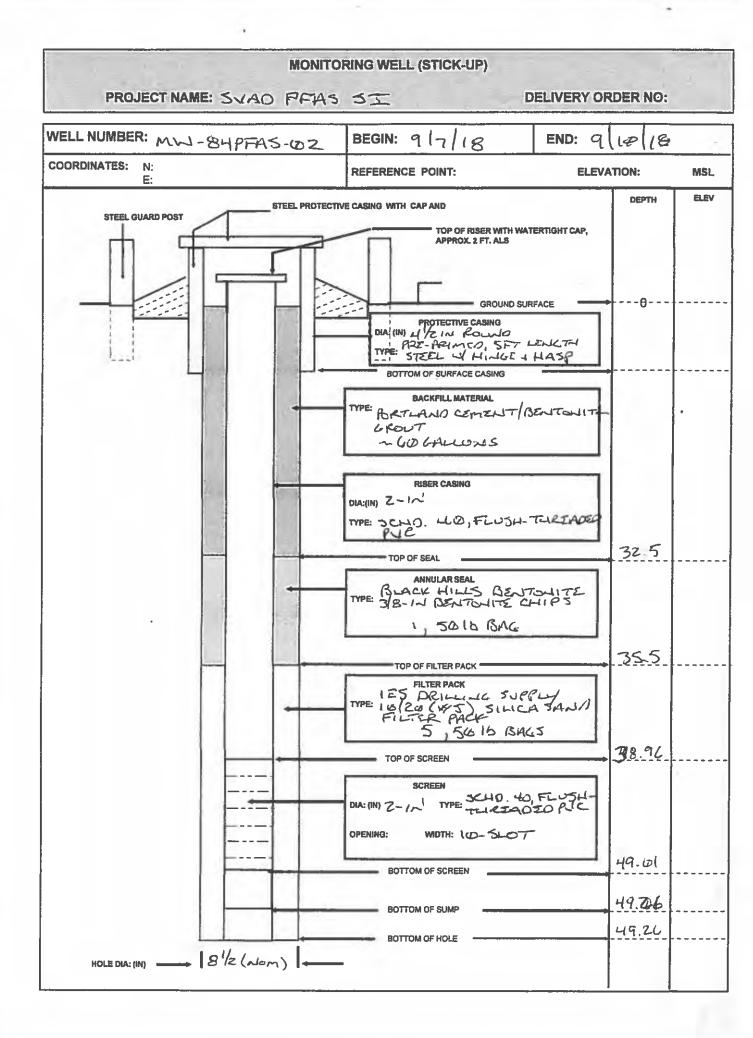
		HTRW DRILL	ING LOG			HOLE NUMBER MW-67P
PROJEC	CT:		SPECTOR M	Kidz	EIS	SHEET H OF H
ELEV. (A)	DEPTH (B)	DESCRIPTION OF MATERIALS (C)	HEADSPACE SCREENING RESULTS	GEOTECH SAMPLE OR CORE BOX	ANALYTICAL SAMPLE NO. (F)	REMARKS (G)
	22	SAME AS ABOVE	currades = 0. appm	20		FILST VIET CUTTINGS RETURNED DRILLING AT ZZ FT BGS
	25 24 27 111111111111111111111111111111111	PFAS SI				T0 = 27 FT

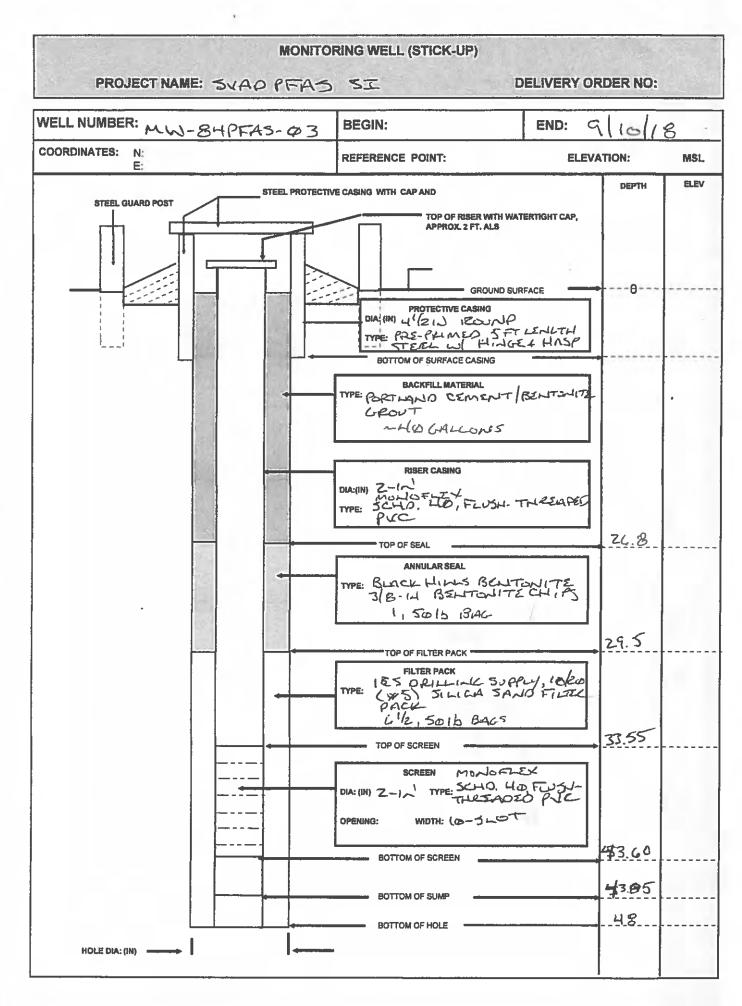












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WELL DEVELOPME	INT FORM
PROJECT NAME: SUAD PEAS SI	DELIVERY ORDER NO:
Date: <u>9 /9 /18</u>	Time: 14(3.0
Well Number and Location: MUL-C7PEAS @1	SVAD SITE 67
Comments: WATER WITIALLY BALLE	ED AND PUMPED WAS VERY
TURBID; APPEARANCE OF	COFFEE,
me g/g	/
	1. st
Water Levels / Time: Initial: 17.200 / 12:12	Pumping: 17.20 / VARIOUS
Final: 17.201 14:30	
· · · · · · · · · · · · · · · · · · ·	Final: 25.62 FT BTOC
Date and Time: Begin: 9918112:12	Completed: 919/18 / 14:30
Development Method(S): BAIL(SURCE W/ DI	SPOSABLE BAILER. PUMP
w/ moniscoul subm	ERSIBLE PUM
Total Quantity of Water Removed: 54 gals	

FIELD MEASUREMENT	SERIAL NUMBER	DATE OF LAST CALIBRATION
Temperature	920-MP-202	9/9/18
Specific Conductivity		
рН		
Turbidity		mp
DO		
ORP		

PROJECT NAME: SUAD PEAS SI

DELIVERY ORDER NO:

WELL NUMBER: MW-67PFA3-01

	Beginning Time	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY	pH (STANDARD UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	WELL VOLUMES REMOVED	(FT BTUE) COMMENTS
9/9/18	1330	30	15.20		5.74	98.3	30	21,21	17.20 BYOMLAT
	13400	~ 21	13.53	6.291	80.2	63.7	34	24.3	17.20
_	1350	.n. 4	13.37	Ø.297	6.10	19.3	38	27.1	17.20
	140Ø	~4	13.32	9.294	6.09	20.0	42	30.0	17.20
	141Ø	-4	13.54	Ø. 293	6.09	22.1	46	32.9	17.20
_	142Ø	24	13.41	Ø.29Ø	6.10	26.3	5ø	35.7	17.20
1	1425	~2	13.38	Ø.289	6.13	2.5	52	37.1	17.20
V	1430	~2	13.41	Ø. 29Ø	6.13	3.1	54	38.6	17.20
<u>.</u>			DEL	ELOPMER	rt Con	PLETE	0		
									,
							1	- C.	
					ande	2/2/10			
						Tura			
									1 CASING VERNE = 1.4 CALL

RECORDED BY: ML Kipe 2/9/18 QA CHECKED BY: Cen for 2/10/18

	WELL DEVELOP	IENT FORM
PROJECT NAME: Sଏକ୍	opphs sz	DELIVERY ORDER NO:
Date: <u>1 /9 /18</u>		Time: 1245
Well Number and Location:	NW-L7PFAS-02	SUAD SITE 67
Comments : WATER IN	ITIALLY Por BALL	ED/PUMPED WAS TURBID;
		TURBIDITY DECLINED
RAPIDLE	AFTER ~15 LALL	onts REMOVED
	- mk 9/9	
	17.98 / 17.98 ~~1991 ~~1991 8.01 / 1215	Pumping: 18.01 / VALIOS
Total Well Depth: Initial:	25.71 FT BTO	C Final: 25,71 FT BTOC
Date and Time: Begin: _9	19/18/ 1035	Completed: 9/9/18/ 12/15
Development Method(S): <u>84</u>	LISURCE WARENE	ISPOSABLE BAILER, PUMP W
SUBM	ERSIBLE PUMP.	
Total Quantity of Water Remov	ed: 37 ga	ls

FIELD MEASUREMENT	SERIAL NUMBER	DATE OF LAST CALIBRATION
Temperature	QEO MP-208 REFE & S NO: 16369	9/9/18
Specific Conductivity		
рН		
Turbidity		Nela
DO		
ORP		

PROJECT NAME: SUAD PEAS SI

DELIVERY ORDER NO:

WELL NUMBER: MW-GIPFAS-02

DATE	BEGINNING TIME	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY	pH (STANDARD UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	WELL VOLUMES REMOVED	WL (FT BTOC)	COMMENTS
<u> 919/18</u>	1135	25	13,57	0.458	5.90	94.0	25	19.8	18.01	
	1145	-3	13.51	0.465	6.69	9.5	z8	22.2		
	1155	~3	14.12	0.467	6.84	4.3	_31	24.6	18.01	
	1205	~3		0.467	6.88	Ч. \	34	27.08	18.01	
¥	1215	~ 3	14.00	0.468	6.90	3.4	37	29.4	18.01	
• <u> </u>		<u> </u>	EJEL	SPMENT	compi	ETER				
					ery g	/				
					44	2/10	·			
										¢
	BY: M	Kip		9/9/18	0	ل الم A CHECKED	ell volum BY: Cl	e = 1.2	le gallons 9/	10/18

WELL DEVELOPM	ENT FORM
PROJECT NAME: SUAD PITAS SI	DELIVERY ORDER NO:
Date: <u>2/7/18</u>	Time: 10/(ø
Well Number and Location: MM-C7PFAS-03	SUND SITE 67
Comments: WATER VERY TURBID THRD REMOVED, THEN EUSARED &	
mik q	
Water Levels / Time: Initial: 12.55 / 0740 Final: 12.53 / 1016	Pumping: 12.58 1 12.5 WE 9/9/18
Date and Time: Begin: <u>9/9/18 / 07:40</u>	Final: <u>24.40</u> FT BTOC Completed: <u>9/9/19/10:10</u>
Development Method(S): BAIL/JURLE W/ DISPO	
Total Quantity of Water Removed:53gal	5

· FIELD MEASUREMENT	SERIAL NUMBER	DATE OF LAST CALIBRATION
Temperature	QED MP-200 EEKSNO: 16369	9/9/18
Specific Conductivity		
рН		
Turbidity		24/4
DO		NIA
ORP		~/A

PROJECT NAME: SVAO PEAS SI

DELIVERY ORDER NO:

WELL NUMBER: MWI-67PFAS-63

DATE	BEGINNING TIME	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY TPMHOSICM	pH (STANDARD (1) UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	Well. Volumes Removed	COMMENTS
919/18	a849	29	12.38	0.120	553	647	29	3.51	12.58
	0900	3	12.39	0.119	5.83	Z54	32	13.9	12.58 WL STABLE 12.58 WL STABLE
	0910	3	12.55	0.118	5.87	180	35	15. Z	12.58
	10920	3	12.02	0.118	5.89	115	38	16.5	12 58
	0932	3	12.48	Ø,116	5.91	76.1	41	17.8	12.58 920mlmm
	ଡବ୍ୟର	3	12.45	0.117	5.92	51.6	44	19.1	12.58
	2950	3	12.48	0.117	5.93	19.5	47	20, 1	12.55
	1000	3	12.54	0.114	5.94	10.7	50	21.7	12:58
	1005	~1,5	12.58	0.116	594	11.4	51.5	22.4	12.58
	1010	-1.5	12.50	0.116	5.15	10.6	53	23.0	12.58
		36	WELDF	PMENT	compl	ETED			
							MZ		
								2/9/18	
ų/									ICASING VOLUME= 2- JOALLONK

RECORDED BY: 1/ Kapp 9/9/18 QA CHECKED BY: Cen for 9/10/18

PROJECT NAME: SVAD PEAS SI

DELIVERY ORDER NO:

WELL NUMBER: MW - 84 PFAS - OI

DATE	BEGINNING TIME	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY (µMHOS/CM)	pH (STANDARD UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	WELL VOLUMES REMOVED	WL Fr. BTOC COMMENTS
9/10/18	1010	27	13.04	0.279	6-51	302	27		43.23
	1020	23	13,12	B.282	7.08	22.3	30		43.23
	1030	~ 3	13.27	0.281	7.25	11.5	33		43.23
	1040	~ 3	13.01	0.283	7.34	8.0	36		43.23
4	1050	~3	13.18	0.278	7-28	7.9	39		43.23
				- DEVEL	いうちょうー	r comp	ETED		
	ļ								
					- TK	2/11/			
			<u> </u>			2/10/18			

RECORDED BY: _____ QL q 10/18

QA CHECKED BY: _____

WELL DEVELOP	MENT FORM
PROJECT NAME: SVAO PFAS SI	DELIVERY ORDER NO:
Date: 9/10/18	Time: 12:35
Well Number and Location: Mul-BUPFAS-	02
Comments : FRST BAILED/PUMPED	MATER TURBID, APPEARACE
OF COFFEE CUEARED	RAPIDLY AFTER ~ 15 CALLONS
RENOVED, MR	- 9/10/10
	-118
Water Levels / Time: Initial: <u>42.72 / 10:35</u>	Pumping: 42,75 1 VARIONS
Final: 42.751 12:35	
	OC Final: 51.36 FT BTOC
Date and Time: Begin: 4/10/18/ 1035	_ Completed: <u>9/10/18/1235</u>
Development Method(S): SURGE/BALL W/ C	ISPOSABLE BAILER; PUMP
WITH JUBMIESIBLE	PUMP
Total Quantity of Water Removed: 32	gals

FIELD MEASUREMENT	SERIAL NUMBER	DATE OF LAST CALIBRATION
Temperature	020 MP-20 8225- 16369	9/10/18
Specific Conductivity		
рН		6
Turbidity	4	NA
DO	nelt	nela
ORP	MA	Mla

PROJECT NAME:

DELIVERY ORDER NO:

WELL NUMBER: MU- SU PEAS-02

		- QH PFA3	- 202						
DATE	Beginning Time	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY (µMHOS/CM)	, pH (STANDARD UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	WELL VOLUMES REMOVED	W2 FK. BTOC COMMENTS
9/10/18	1155	20	12.45	0.228	6.52	135	20		42.75
	1205	~3	12.26	0.728	7.80	10.4	23		42.75
	1215	~3	12-34	0.229	8.07	5.4	26		42.75
	1225	~3	12.30	0.228	8.14	3.9	29		42.75
1	1235	~]	12.35	0.228	8.16	3.7	32		42.75
			DEN	ELOPMEN	to com	PLETER	p		
$\langle \rangle$									
					11.				
						Lie/ce			
				<i>z</i>					

B-98

RECORDED BY: _____ Qlu g /10/18

QA CHECKED BY: _____

WELL DEVELOPMENT FORM	
PROJECT NAME: SVAD PFAS SE DELIVE	ERY ORDER NO:
Date: <u>1/10/18</u>	Time: 09.005
Well Number and Location: MUJ-84PFA5-03 5440 5	ITE 84
Comments: WATER TRANSWEEN'T EVEN AF	TER SUBCINK/
BAILING. NE 240/20	
alles / 28	
Water Levels / Time: Initial: 38,97 / 07:15 Pumping: 3	8.98 NARIOUS
Final: 38.98 1 09:05	
Total Well Depth: Initial: <u></u> FT BTOC Final:	46.17 FT BTOC
Date and Time: Begin: <u>910/19</u> 0715 Completed: <u>9</u>	10/18/0905
Development Method(S): SJRLE/BAIL W/ DESPOSABLE	BAILER, PUMP
W/ SUBMERSIBLE PUMP.	· · · · · · · · · · · · · · · · · · ·
Total Quantity of Water Removed: 43 gals	

FIELD MEASUREMENT	SERIAL NUMBER	DATE OF LAST CALIBRATION
Temperature	QEO MP-20 REELSNO: 16369	9/10/18
Specific Conductivity		
рН		
Turbidity		-1/A
DO	nula	NIA
ORP	min	NA

PROJECT NAME: SVAD PFAS SI

DELIVERY ORDER NO:

WELL NUMBER: MW-84PFAS-63

DATE	BEGINNING TIME	GALLONS REMOVED	TEMP (C)	SPECIFIC CONDUCTIVITY	pH (STANDARD UNITS)	TURBIDITY (NTU)	TOTAL GALLONS REMOVED	WELL VOLUMES REMOVED	(FT BTOC) COMMENTS
9/10/18		25	13.33	6.333	5.60	380	25		38.98
	0815	23	12-38	0.312	7.85	38.6	28		38.98
	0825	~3	12.35	Ø.308	8.13	14.0	31		38.98
	0835	~3	12.37	Ø. 307	8.18	7.3	34		38.98
	0845	~3	12.50	0.308	8.17	5.7	37		38.98
	0855	~ 3	12.68	0.308	8.16	5.3	40		38.9.8
	0905	~ 3	12.75	0.308	8.16	4.4	43		38.98
		DZY	sign	IENDT CO	MAETE	>			
					huce	9/10/			

RECORDED BY: Cleh for 9/10/18

QA CHECKED BY: Mil Kung 1/10/10

PRE-ENTRY SAFETY & HEALTH	TRAINING RECORD
PROJECT NAME: SVAD PEAS SI	DELIVERY ORDER NO:
	PAGEOF
DATE: 9/5/18	TIME:
MEETING LOCATION: SURD SITE 67	
SITE SAFETY & HEALTH OFFICER: MIKE KLICZES	3
SUMMARY OF MEETING ACTIVITIES: SITE JOB HAZA	ROS I) WORK AROLNO
AUGER RIG (ENTANCLEMENT, PINCH, FI	ALLING AUCERSTOOLING;
2) BIOLOGICAL HAZAZOS (TICKS, SN	
H) DRIVING; 5) UNAUTHORIZED PERSON	
6) INCLEMENT WEATHER; 7) HEAT	
9) SITE CONTAMINANTS (PEAS, POL)	: 10) CHIEMICOL TOOLS
(SILICA-CONTAINING MATERIALS;	ISOBUTYLENE; 11) SUPS, TRIPS,
FALLS HAZARD CONTROLS: 1) ONL	
RIL: 2) AMARENESS OF HAZAROS; 3) SITE	LINSPECTIONS; H) EXCLUSION
ZONE; 5) TAKE BREAKS AS NEEDED; 6)	BUDPY SYSTEM; 7) STOP-WORK
AUTHORITY; 8) PRE; 9) 505 LOCATION	(10) EMERCENCY CONTACTS
AND SUPPLIES; 11) TRAINING REQUIREM	
OTHEL DISCUSSION POINTS I) PEAS F	
AND WELL INSTALLATION; 3) DEC	
AND HANDLINK.	•

THE FOLLOWING INDIVIDUALS ATTENDED THE PRE-ENTRY SAFETY & HEALTH TRAINING MEETING:

SIGNATURE COMPANY NAME ero (100 6 2 eidos 1003 9/5/18 Mr **RECORDED BY:** QA CHECK BY: (Signature and Date) (Signature and Date)

FIELD CHECKLIST FOR PFC SAMPLE COLLECTION

PROJECT: SVAD PEAS ST SITE: 67 AND 84

pg 1 of 2

Reviewed with the Following Field Staff: CHARLES SPURR, DALLA WINSLOW, GARY SHIFT (MATECO), JEFT CROEL (MATECO)

Date: 9/5/18 Conditions: Normal

Verified:	Sampling Equipment:
~	NO Teflon (or other fluoropolymers)
\checkmark	NO aluminium foil
	Only HDPE/LDPE/silicone in use
V	Only nitrile gloves (changed often)
Verified:	Sample Bottles:
	NO glass or LDPE bottles
-	NO Teflon lined caps
~	NO chemical ice packs/NO blue ice
	Only HDPE bottle with poly/HDPE caps
L	(bottles will be preserved with Trizma if residual chlorine expected)
/	Only regular ice in Zip-loc bags
Verified:	Field Documentation
~	NO waterproof/treated paper of field books
	NO Rite-in-the-Rain notebooks
1	NO plastic clipboards
-	NO Post-it notes or other adhesive papers
V	NO Sharpies
V	Only loose, plain paper
V	Only metal clipboards
1	Only ballpoint pens
Verified:	Decontamination Procedures
	NO Decon 90 (or other flouro-containing detergents
L	Only Alconox or Liquinox
MATERIALS	TO AVOID: FIELD STAFF CLOTHING/PERSONAL CARE
Verified:	Clothing Worn by Field Crew
1	NO clothing or boots with Gore-Tex or other synthetic, resistant fabrics (e.g., Tyvek)
V	NO clothing with stain-resistant materials or treatments (e.g., Scotch-Guard)
~	NO clothing washed with fabric softener
V	Only cotton clothing (laundered multiple times w/out fabric softener)
V	Only rain gear made from polyurethane or wax coated material
L	Only polyurethane/PVC boots or untreated leather boots
Verified:	Personal Care Products Used by Field Crew
V	NO cosmetics, moisturizers, lotions, etc
V	Only APPROVED sunscreen: See Table 1 of SOP
~	Only APPROVED insect repellant: See Table 1 of SOP

FIELD CHECKLIST FOR PFC SAMPLE COLLECTION

PROJECT:

MATERIALS	TO AVOID: FIELD STAFF CLOTHING/PERSONAL CARE (continued)
Verified:	Food/Beverage
~	NO food/beverages on-site with the exception of water/hydration fuids
V	AVOID pre-packaged food, fast food wrappers/containers
1	Wash hands after eating
10	

Detail below any items which cannot be verified:

MODUS-Provide details of corrective action(s) taken in response to above items:

al a/ 5/18

MDH2

MIKE KnidZEJS Field manager (print): Field Mgr Signature: 0700 ี่ วิ 8 Date / Time:

TAIL PROJECT NAME:	GATE SAFETY MEETING LOG I DELI	FORM VERY ORDER N	0:
DATE: 9/4/18	SuM TuW ToF Sa	TIME:	0710
VEATHER: CLOU2-1, LIGH	IT DRIBZLE, TEMP IN	705 WIN	0~10
VORKING CONDITIONS: $\sqrt{\varepsilon_{1}}$			
REQUIRED PPE: LEVEL O			
NOTES:			
- MOSQUITOS ; INS	SCT REPELLANT		
- POISONINY			
- TICKS			
- COVER WELL CA	SILLS WILLEN POURI.	SE MORTA	R
	My glelis		
	- Celis		
		>	
			<u> </u>
The following individu	uals attended the daily "tailgate safety me	eting": (signatures)	
Charles Spur	Cley for	9/6/18	
DANG WINSter	hit 1	Keipes	
JELL Croel	The had	Matrico	
GIRN SLIKT	Place	MATer	
	13/2		
11	1 Vili al. 1	18	
/ IA			

PROJECT NAME:	AILGATE SAFETY MEETING LOG FORM DELIVERY ORDER NO:
DATE:	SuM TuW ThF Sa TIME:
WEATHER:	•
WORKING CONDITIONS:	
NOTES:	
NOTES:	
······································	
	me
+	
The following in	ividuals attended the daily "tailgate safety meeting": (signatures)
· · · · · · · · · · · · · · · · · · ·	
·	

SITE HEALTH & SAFETY OFFICER (Signature and Date)

ROJECT:	DAILY SAFETY INSPECTION	
Date	Page 1 of	
4/5/2/9/9/9/9/10/ 18/13/18/19/10/ 18/18/18/11/18/18		
Response (Use Y, N, or NA)	ITEM	
J Y Y H H N N	Daily safety briefing conducted?	
Y Y Y Y Y Y	Emergency numbers and route to hospital posted?	
YYYYYY	SSHP on-site, available to employees, and complete?	
YYYYYYY	Required exposure monitoring conducted and documented?	
X Y Y Y Y Y	Calibration of monitoring instruments (PID, OVA, CGI) checked (and documented) daily against known standard?	
YYYYYY	First ald kit available and inspected weekly?	
Y Y Y Y Y Y	Personnel wearing PPE required by SSHP for fieldwork (at least safety shoes or boots, safety glasses with side shields, and nitrile or similar gloves to handle potentially contaminated material)?	
Y Y Y Y Y Y	Personnel using buddy system (maintaining visual or verbal contact and able to render aid)?	
Y Y Y Y Y Y	If temperature ≥70°F: heat stress training, cool fluids, other controls in SSHP being followed?	
ANANIA NAN NANANA	If temperature ≤40°F: cold stress training conducted, controls in SSHP implemented?	
YYY Y Y Y I	Personnel using appropriate biological hazard controls (see SSHP)?	
YYYY Y NIA NIA	Drill rig operating manual on-site?	
Y Y Y Y MIX NA	Drill rigs inspected weekly and documented?	
Y Y Y Y Wla NA	Personnel near drill rig or other overhead hazards wearing hardhats?	
Y Y Y Y NA NA	Each of two drill rig kill switches tested daily?	
YYYY Y JANA	Employees excluded from under lifted loads?	
Y Y Y Y Y Y	Unnecessary personnel excluded from hazardous areas, specifically near drill dgs?	
Y Y Y Y NIA when	Radius of exclusion zone around drill rig at least equal to mast height?	
AYYYY AlaNA	Personnel wearing hearing protection when within 25 feet of operating drill rigs?	
YYYYY Na Nh	Containers of flammable liquids closed and labeled properly?	
YYYYYYY	Fully charged fire extinguishers available (serviced annually and inspected monthly)?	

	DAILY SAFETY INSPECTION		
PROJECT:	Page 2 of 2		
Date			
12 15 18 13 18 13 18 13 18			
Response (Use Y, N, or NA)	ITEM		
MAYYYYYYY	Personnel exiting potentially contaminated areas washing hands and face before eating?		
NAY Y Y Y Y Y	Portable electrical equipment double-insulated or plugged to a GFCI?		
Y Y Y Y Y Y Y	Electrical wiring covered by insulation or enclosure?		
MAYYYY MAMA	Three-wire, UL-approved extension cords used?		
7 7 7 7 7 7 7	Housekeeping adequate (walkways clear of loose, sharp, or dangerous objects and trip hazards; work areas clear of objects that might fall on employees)?		
Y Y Y Y Y Y Y	Walking/working surfaces safe (not slippery, no unguarded holes, no trip hazards)?		
MA	Confined-space entry performed according to SSHP and EC&HS Procedure 10?		
	Excavations deeper than 5 feet shored or sloped (If personnel will enter) and in compliance with SSHP?		
M/AYYYY NA NA	Moving (rotating) machinery guarded to prevent employee contact?		
N/A N/A	Fall protection provided for work at elevations greater than 4 feet?		
Y Y Y Y Y Y Y	All containers of hazardous material labeled to indicate contents and hazards?		
Y Y Y Y Y Y Y	MSDSs for hazardous materials on-site?		
VA	Fifteen-minute eyewash (accessible and full) within 100 feet of areas where corrosive sample preservatives are poured?		
VYYYYYYY	Potable and nonpotable water labeled?		
	Chainsaws have anti-kickback protection? Personnel wearing cut resistant gloves, protective chaps?		
Y Y Y Y Y Y	Site hazards and controls consistent with SSHP?		
Y Y Y Y Y Y Y	Site hazard controls appropriate and sufficient?		
Actions taken to correct or control any "N" responses	:		
Name MILLE KLIDZEJJ	Signature MLKhhh Date 9/17/18		

		EQUIPMENT CAL	IBRATION			and the second		
PROJECT N	AME:			DELIVERY	ORDER NO:			
IDENTIFIER	ITEM DESCRIPTION	BACKGROUND READING	PRE	ADJUSTMENT (IF NEEDED)	POST	NAME	DATE	
82577	32577 MINIRAE 3000 PIO 0.10		pm 100,1pp	n -	100.1 ppm	M. Kinder	59518	
		O.3.DAM	100.00An		100.0 pp-1		26/18	
		u.z.ppm	100.000m		100.000		9/7/18	
		O. I ppm O. I ppm	100,0,pm		100 0 ppr		9/8/18	
1/3/9	*	Q.1ppm	100.0.2.m		100.00 Am		9/9/12	
16369	QED MID-20	DAT STN	7:30	TOT. DO				
		pHH STND	4.04	To 4.00	799			
	6+	Conto 4.49 ms/cm	4.52	TO 4.49	4.49			
<u> </u>		TEM(METER 16-13-C		These		Y	
82577	Mini PINE BOOD PID	O.1 ppm	LOD. O/jn		(00.00/m		9/10/18	
		pH2 ST-V	-	- f - f				
		pH4 STHD	MU	- 4/10/10			-	
		CONIS 4.49m5/emstu						
		TEMP	METER		THERE	V	-K	
16369	QED MP-20	pH7 Strd	7.05	to 7.00		C. SPURI	2/10/14	
		PH 4 Stad	3.99	10 4.00	4.00		1	
		cond 4.49 ms/cm	4.52	h 4.49	4.49			
J	1 V	Temp.	Meter yoc		therm 15°C			
		MK				in the second	OWE	
				10 ST 1				

QA CHECK BY:

		EQUIPMENT CALIBR	ATION				
ROJECT NA		DELIVERY ORDER NO:					
IDENTIFIER	ITEM DESCRIPTION	BACKGROUND READING	PRE	ADJUSTMENT (IF NEEDED)	POST	NAME	DAT
					-		
						-	1-
	·						_
		MK	_		_		
			18				
							+
			$\overline{}$	<u></u>			
						-	-
						4	
	······································				<u> </u>		
						<u> </u>	

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QA CHECK BY:

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TASK TEAM ACTIVITY LOG SHEET

PROJECT NAME: SYAO PEAS ST	DELIVERY ORDER NO:
Date (mm/dd/yy): 10/2/18 Su M (Tu) Task Team Members: MIKE KLIZZJS-LEICOS, P.C.	W Th F Sa PAGE OF 6
	1-24
CHARLES SAURZ-LEIDUS, GEOL	
and colding	
Narrative (include time and location): 6645 M. KuidzESS AR21JES	AT JYAD SITE GT.
0655 C. SPURE ON SITE, 070	
	DO AGES 1175 BARIAO
(SZE SNIZET).	
07105 CREW ARRISS AT MW-	LTPFAS-01 TO PURLE AND
SAMPLE WELL, UNLOAD EQ.	JIPMENT. SET UP PECON
LINE CONSISTING OF I) D	ZIONIZED MATER (DI) AND
LIQUINOY, 2) DI WATER,	3) DI WATER. DECON QID
SAMPLE PRO PUMP ANO W	HATER WEYSLINDICHTOR (WLIT).
CALIBRATE PHOTONIZATION	DETECTOR (PID); QZO MP-ZO
WATER QUALITY METER, AND	HANNA TURBIDITY METER
(SZE MATE LOCSHEETS).	
0805 OPEN WELL PID AT TO	of OF CASING (Tud = 0.00pm
MEASURE WHATER LSVEL (WIL	0
RELORDED TOTAL DEPTH (TD) =	23 FT. WATER COWMN = 7 FT
OBRO SET PED PUMP W/ NEW TUBIN	& AT MID-POINT OF ILLATER
Daily Weather Conditions: A.M. (04.56) CLOUDY,	TEMP SI, WIND NAW - SMOK
(PM /10/5) CLOUD/ 7	340 53 VILLON NEARLY CHIM
Recorded By 11/2 10/2/18	QA Checked By Cell for 10/3/18

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TASK TEAM ACTIVITY LOG SHEET
PROJECT NAME: SVAD PFAS 53 DELIVERY ORDER NO:
Date (mm/dd/yy): 10/2/18 Su M TW W Th F Sa PAGE C OF C
52.2 22 1000
Narrative (include time and location):
0822 MEASURE INITIAL WEL AT IL. OG FE BTOC
2824 BELIN PURGING AT CAM 2 R-20 D-10, 30 PSI (SEE PURGLOS)
0918 PURCING COMPLETED. PARAMETERS STABLE. TURB < 10 NITES
OTLO BEGAN COLLECTINE SAMPLEID MW-PEAS-OI LOOSOI
MATRIX SPIKE LOOSOIN, MATRIX SPIKE LOUSOIND,
AT SPLIT LOOSOIX, NOTE EUROFILIS INCLUDED 2, 250-ML
BOTTLES OF PEAS. FREE WATER IN SHIPMENT OF CONTAILIES.
THE PFAS-FREE BOTTLES HAVE CUSTOON STALS MARKED "TRIP
BLANK - PO NIST OPEN!" WILL PREPARE SAME TELESE
AS UNAABELLED SAMPLES AND RETURN TO THE LAB WITH THE
SPLIT
PULL WILT PUMP AND TUBING FROM WELL, DISCARD TUBING
+ BLADDER DECON PUMP, WLT, AND FLOW CELL
1000 COLLECT EQUIPMENT RINSATE SAMPLE 10 MW-67PFAS-02
Daily Weather Conditions: A.M.
1 P.M.
Recorded By Marth 10/2/15 QA Checked By Clen for 10/2/18

TASK TEAM ACTIVITY LOG SHEET

PROJECT NAME: SVAD PEAS SI DELIVERY ORDER NO:

Task Team Members:	isterio di anti-
J.50	
JERR	
Narrative (include time and location):	
LOOSEBOI BY POURING TEST	- AMERICA DI WATER
INTO RUMPANIA FROM RUM	PINTO CONTAINERS
1005 COLLECT DI LATER SOUR	CE FIELD BLANK 10
MW-67PFAS-02 LOOSFB02-	PARINE TEST AMERICA
DI WATEL FROM CUBITAINE	KINTO Z, CONTAINERS
010 MOVE TO MUL- 67PFAS-02	UNLOAD AND SET UP EWIPMENT
1020 OPEN WELL. PID AT TOC = (D. D. DUM - MELASURI WIL AT
16.96 FT BTOC. RECORDED TI	0 = 23.3 FT Broc.
1028 SET PUMP W/ NEW TUBRUL	+ BLADDER AT MID-POINT
OF WIL AT 20 FT BTOC. N	OTE USING FROM EQUIPMENT RUSH
1931 MEASULE WITIAL WL AT 1	4.96 F. BEac. BELL RELINE
AT CPM 2 R-20 0-10 30 PSI	
44 PURCHAL COMPLETED. PARAMETERS	STABLE, TURBIDIAN STONTUS
46 COLLECT SAMPLE ID: MW-67PS	
L00501D	NV. WHEND

Daily Weather (Conditions: A.M.	44		1.1	Had.
ĺe,	/ , P.M.	142/10			
Recorded By	11 11	DZ/18 QA Checke	d By Ceen	f-	10/3/18
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TASK TEAM ACTIVITY LOG SHEET PROJECT NAME: SVAD PEAS SI DELIVERY ORDER NO: Date (mm/dd/yy): 10/2/18 Su M (Ty W Th F Sa PAGE 4 OF 6 Task Team Members: 528 R 10F Narrative (include time and location): PULL WLI AND PUMP FROM WELL, DISCARD TUBLE ALLO BLANDER, DECON. LOAD. 1215 MOUE TO MUL-LIPFAS-03. UNLOAD SET UP EQUIPMENT OPEN WELL. PID AT TOC = 0.1 ppm-MEASURE WIL AT 11.52 FT BTOC. RECORDED TO -27FT BTOC 1230 PLACE SAMPLE PRO RUMP W/ NEW TUBING AND BLAPPER AT MID-POINT OF SCREEN AT 22 FT BTOC. 1232 MEASURE WITTAL IN AT 11.52 FT Broc. 1235 BELLI PURCING AT CPMZ R-ZO D-ZO 30 PSI 1408 PURCINE COMPLETED. PARAMETERS STUBLE, TURB & IONT. 1410 COLLECT SAMPLE MW-67PFAS-03 LOOSDI 1425 PUMP, TUBING, AND WILT REMOVED FROM WILL, EQUIPMENT LOADED. OFF WELL SITE TO TRANSFER GEOUNDALATER AND Daily Weather Conditions: A.M. (1215) CLOUDY, TEMP 56 WIND NEWPLY CALM P.M. KISZS CLOUDI TEMP 59, WIND SSE AT < SMPH 2 10/2/18 QA Checked By Clen 1_ 10/3/18 Recorded By

TASK TEAM ACTIVITY LOG SHEET

PROJECT NAME: D	ELIVERY ORDER NO:
Date (mm/dd/yy): <u>lo/2(18</u> Su M Tu W Th F Task Team Members:	Sa PAGE 5 OF
Star RE	
JER PESC	
Narrative (Include time and location):	
1453 CREW ARCULES AT MU-BUPFA	5-03- UNLOAD EQUIPMENT
PLACE NEW OI WATER IN D	
DECON PUMP, WLI AND FLOW	CELL, SET UP
OPEN WISLL PIO AT TOC = 0	
MEASURE WIL AT 39.28 FT Bro	C. RECORDED TOZ OFF
1515 SET PUMP WI NEW TUBING AND BLACK	
AT 43.5FT BTOC	
1516 MEASURE INDITIAL WEL AT 39.28 F	T BTOC
1520 BEGIN PURCIAL AT CPMZ R-20	0-10 30 PSI
1415PURCINE COMPLETED. PARAMETER	5 STABLE; TURB < 10NTUS
1617 COLLECT SAMPLE MW-84PFAS-0	83 600501
PULL PUMP+WLI, DECOND WLI AND	FLOW CELL, LOAD,
4500FF WILL SUTE.	
1705 ARLIS AT DRUM STAGING AR	EA. CHURLES TO MAL
Daily Weather Conditions: A.M.	
P.M. P.M. Recorded By ///////////////////////////////////	ed By Clen from 10/3/18

PROJECT NAME:

DELIVERY ORDER NO:

Date (mm/dd/yy): 10/2/18 PAGE 6 OF 6 Su M (Tu W Th F Sa Task Team Members: STE RIVEL Narrative (include time and location): DRUM LOCATIONS 1/2/18 SAMP CHARACTERIZATION SAMPLE 1725 COLLECT NO: IOW - WA-PFA LOOSOI W FOLLOWING CONTAINERS TCLPVEB UNPRESERVED VDA VIALS TCLP SVOCS - Z, IL AMOSER TCLP METALS/Hg-1, 500mL POLY PCBS, - Z, IL AMBER TOTAL CYANIOE -1,250 ML, NOOH PRESERVED NOZI TOTAL SULFIDE -1,250 mL, NOOH PRESERVED PH - 1, 250 ML FOLLY FLASHOWIT/FLAMMANSILTT/-1,250 ML FOL/ NOTE: HAD BOTTLES DIFFEL FROM DAPP BUT MARE ML 10/2/18 CLOSELY MATCH TEST AMERICA BOTTLE SHIPMENT SUMMARY FORM AVALABLE FOR (SENT) FOR TOTAL SUFIDE. Daily Weather Conditions: A.M. 10/2/18 QA Checked By Cle 2 10/3/18 **Recorded B**

PROJECT NAME: SUAD PEAS SI	DELIVERY ORDER NO:
Date (mm/dd/yy): 10/3/18	DTh F Sa PAGE / OF 3
Date (mm/dd/yy): <u>12/3/18</u> Su M Tu V	DTh F Sa PAGE / OF
M. KLidzETS-LEIDOS, PL	sense of the second second
C. SPURE-LEIDUS GEOL	THE
mu id shire	ALL CONTRACTOR
Narrative (include time and location):	strongels free transported and 222481
0645 M. KLIDZETS ARLIVES AT	
OTOO MIST W/ C. SRURR AT MU	1-FFAS SUPFAS-01
UNILOAD EQUIPMENT. CALI	BRATE PID, MP-200, AND
HANNA TURBIDITY METER (SEE METE LOG SHEETS
- ALCON PUMP.	
0735 OPEN WELL, PID AT TOC	= 3.0 ppm. B2=0.0ppm
MEASURE WIL AT42.96 FT 1	STUC. RICORDED TO E48FT
ISTOC.	
6743PLACE DEN PUMP W/ NEW TOF	SILL+ BLADDER AT 45FT BTOC
6745 MEASURE INITIAL WILL AT 4	2.94 FT BTGE.
BELIN RUPUNK AT CPMZ R	-20 D-10 30 PSI
0815 COLLECT REAGENT BLANK	NO: MW-84PFAS-01 LOOSRBOI
By POURING TRIEMA PRESER	ED TA DI WATIL WTO
2. UNPRESERVED CONTAINER	
19855 PURCHE COMPLETED, PARAM	ETTES STABLE, TURA LIONTU
Daily Weather Conditions: A.M. (2645) PARTLY C.	aup/ TEMP 64 WIND 5-10MPH
	EAR TENP 74, WIND SAT 10-15MP4
Recorded By / / / / / / / / / / / / / / / / / /	A Checked By
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Date (mm/dd/yy): <u>ເວ/3(ເ</u> ອິ Task Team Members:	Tu (W) Th F Sa PAGE <u>3</u> OF <u>3</u>
JEIE PE	10
Narrative (include time and location):	Taken and ben mind and the south
	NL ARSA. TRANSFER FILAL
PURCE AND DECON VLAST	ENGATER TO DRUMS.
GO TO USACE BLOC ANY	S RETURNE KEYS
	TO SHIP RENTAL EQUIPHS
	ZEJS TO SHIP Z COOLERS
	20 FINS VIA FEDEX. KLIDREIT
	STRER EQUIPMENT BACK NOM
VIA UPS.	PRES POOPVIELT DALE POOP
N NICE DISC	
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aily Weather Conditions: A.M.	le sue
P.M	A Checked By

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PROJECT NAME: SVA	D PFTAS SI	DELIVERY ORDER NO:	S.
Date (mm/dd/yy):	Su M Ti	W Th F Sa PAGEOF	
Task Team Members:			
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Narrative (include time and locat	ion):		
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Daily Weather Conditions: A.M.			~
P.M		\\\\ 	
Recorded By	<u>2</u>	_ QA Checked By	

		EQUIPMENT CAL	IBRATION				Margare .
PROJECT N	AME:			DELIVERY	ORDER NO		
IDENTIFIER	ITEM DESCRIPTION	BACKGROUND READING	PRE	ADJUSTMENT (IF NEEDED)	POST	NAME	DATE
82843	MiniRae 3000	0.2 ppm	0.2 ppm	FA OB ppm Span 100 Dppm	0.0	C. Spurr	10/2/1
16369	QED MP20	pH 7.0	7.14	7.00	6.99		1
		pH 4.0	3.88	4.00	4.01		
		Spc 4.49 ms/cm D.O. 90	4.48	4.49	4.49		
			748months	754 mills	75-1 mm H S		
		ORP Z40 mV	248	240	240		
¥	V V	Temp. °C	14.52		1400		
82987	HANNA HE F8722	CO. LONG JTAP	CALIBRIT	iand stay			TV-
82843	MULIRAE 3000	O.IPPm	DIOPM	spane 100.1 ppn	Palpon	M. Kidetos	1/2/18
82987	HANNIA HI 98703	CALIBRATION			100		1
16369	QIO MP.20	DH 7 STND	7.19	TO 7.00			
1		OH 4 STAD	3.92	TO 4.00	3.99		
		COND 4 49 ms/cm STAD	4.48	704.49	4 49		
		ORP 240 INVSTAD	237	TO 240	240		
		00% 748mm Hg	748mmHc		101 4% SAT THEMMHS		
-K-	4	TEMP	METER: 16.23°C	-	THEEM-	V	V
		mk 31	2/19				
		VICTIME -S		-			

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		EQUIPMENT C	ALIBRATION						
PROJECT NAME		DELIVERY	DELIVERY ORDER NO:						
IDENTIFIER	ITEM DESCRIPTION	BACKGROUND READING	PRE	ADJUSTMENT (IF NEEDED)	POST	NAME	DATE		
			-		-				
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				GF	IOUND WAT				n Mw- tel	eras - el
PROJE	CT NAME:								ERY ORDER N	
ТІМЕ		PURGE RATE (mL/min)	ORP (mv)	TEMP (C)	рН (s.u.)	COND (mS/cm)	DO (mg/L)	TURBIDITY (NTU)	DEPTH TO WATER (FT BTOC)	COMMENTS
0828	0.5	~200	242	14.06	5.97	0.255	12.94	7.48	16.09	
0838	2.5		238	13.70	6.03	0.255	12.95	8.62	16.09	
0848	4.5		235	13.69	6.05	0.262	12.90	5,98	16.09	
0858	6.5		231	13.54	6.08	0.266	12.88	3.36	16.09	
0908	8.5		228	13.62	6.10	0.271	12.88	2.24	16.09	
0918	10.5		226	13.65	6.11	0.273	12.81	2.16	16.09	
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					10/2/18					
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PROJE	CT NAME:						£			HY OFFERI	
TIME	L REMOVED	R/	RGE ATE /min)	ORP (mv)	TEMP (C)	рН (s.u.)	COND (mS/cm)	DO (mg/L)	TURBIDITY (NTU)	DEPTH TO WATER (FT BTOC)	COMMENTS
1034	0.5	~2	00	220	16.13	6.47	Ø. 509	9.50	6.47	16.95	
1044	2.5			215	14.64	6.94	0.522	8.05	1.66	16.95	
1054	4.5			212	14.65	6.99	0.527	7.69	0.93	16.95	
1104	6.5			209	14.53	6.99	0.520	7.18	0.83	16.95	
1114	8.5			207	14.44	7.01	0.520	7.07	0.46	16.95	
1124	10.5			205	14.46	7.00	0.521	6.73	0.36	16.95	
1134	12.5			204	14.52	7.00	0.519	6.64	0.31	16.95	1
1144	14.5		V	202	14.38	7.01	0.516	6.50	0.21	16.95	
						CS 10/2	./18				
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			adam hay day into a "Pipela har in a Pipela into a state and a state a state and a state a state a state a state			IOUND WAT			C.		74-05-03
PROJE	CT NAME:						e ^r		DELIVI		
TIME	L REMOVED	R	IRGE ATE ./min)	ORP (mv)	TEMP (C)	рН (s.u.)	COND (mS/cm)	DO (mg/L)	TURBIDITY (NTU)	DEPTH TO WATER (FT BTOC)	COMMENTS
238	Ø.5	21	00	198	14.93	7.12	0.138	9.85	33.2	11.51	1
248	2.5			204	13-17	6.41	0.135	10.23	118	11.51	
1258	4.5			204	13.70	6.22	0.133	10.22	106	11.51	
308	6.5		4.00°	205	13.64	6.15	0.132	10.31	99.8	11.51	
1318	8.5			205	13.58	6.15	0.132	10.57	70.1	11.51	
1328	10.5			205	13.55	6.10	0.132	10.62	46.3	11.51	
1338	12.5			206	13.47	6.08	0.131	10.53	28.3	11.51	
1348	14.5			206	13.40	6.08	0.131	10.63	18.3	11.51	
1358	16.5			206	13.43	6.08	0.130	10.65	11.2	11.51	
1408	18.5	,		206	13.41	6.07	0.130	10.69	7.03	11.51	
						- (5	10/2/18				1
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PROJE	CT NAME:		1994 - C			f -		DELIVI	IRY ORDER (
TIME	L REMOVED	PURGE RATE (mL/min)	ORP (mv)	TEMP (C)	рН (s.u.)	COND (mS/cm)	DO (mg/L)	TURBIDITY (NTU)	DEPTH TO WATER (FT BTOC)	COMMENTS
0755	0.5	100	163	17.39	5.96	0.203	10.09	13.8	42.96	Initial DTW 42.96
0805	1.5		162	15.61	6.69	0.205	10.72	4.37	42.96	
0815	2.5		166	15.04	7.00	0.206	10.64	4.63	42.96	
0825	3.5		163	15.14	7.16	0.208	10.48	4.21	42.96	
0835	4.5		160	15.46	7.24	0.208	10.43	3.09	42.96	
0845	5.5		158	15.70	7.30	Ø.208	10.31	2.35	42.96	
0855	6.5	\vee	156	15.79	7.33	0.209	10.26	1.89	42.96	
					CS 10/3	18				
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					GI	ROUND WAT	ER MICRO	D PURGE LO)g Well	E MW 8	48FAS-02
PROJE	ECT NAME:		tana.							IRY ORDER I	
TIME	L REMOVED	RA	RGE \TE /min)	ORP (mv)	TEMP (C)	рН (s.u.)	COND (mS/cm)	DO (mg/L)	TURBIDITY (NTU)	DEPTH TO WATER (FT BTOC)	COMMENTS
0954	0.5	-10	0	170	20.25	7.13	0.211	9.54	102	42.54	initial ATW 42.54
1004	l.5			164	19.75	7.40	0.216	9.07	65.6	42.54	
1014	2.5	1		159	19.87	7.47	0.213	9.01	47.6	42.54	
1024	3.5			157	20.59	7.51	6.215	8.86	35.6	42.54	1
1034	4.5			158	19.34	7.53	Q.214	9.08	23.6	42.54	
1044	5.5			158	19.33	7.54	0.215	9.26	16.5	42.54	
1054	6.5			158	19.27	7.57	0.215	9.22	11.1	42.54	f in the second s
1104	7.5			157	19.18	7.58	0.216	9.32	10.1	42.54	
1114	8.5		-7	156	19.12	7.59	0.215	9.47	6.46	42.54	
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						CS 10	3 18				
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				GI	TOUND WA	TEH MICRO	PURGE LO	og Well	DE MAN	24945-0 <u>3</u>
PROJI									ERY OF DER I	
TIME	L REMOVED	PURGE RATE (mL/min)	ORP (mv)	TEMP (C)	рН (s.u.)	COND (mS/cm)	DO (mg/L)	TURBIDITY (NTU)	DEPTH TO WATER (FT BTOC)	COMMENTS
1525	0.5	100	183	16.34	6.84	0.357	11-8D	2.97	39.26'	INITIAL UL = 39.28 FT BTOC
1535	1.5	CS 10-3-18 +78	178	14,62	7.78	0.353	11.93	11.8	39.26	
1545	2.5		174	14.56	7.96	0.349	11.74	19.2	39.26	
1555	3.5		172	14.37	8.01	0.347	11.57	15.3	39.26	
1605	4.5		171	14.42	8.03	0,348	11.45	11.9	39.26	
1615	5.5	V	170	14.72	8.05	0.346	11.36	8.66	39.26	
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NE:		DELIVERY ORDER NO:									
PROJECT IDENTIFIER	ITEM DESCRIPTION	LAST RECALL	NEXT RECALL	DATE	COMMENTS						
82577	MINIRAL 3000 PID	8/15/18	3/15/19	9/5/18							
16369	RED MP-ZO				RENITAL FROM ENVILENTMENTAL ROUF SUPPLY (EES)						
82843	MILIRAE 3000 PIA				1 cf						
82987	HANNA NI 98703	9/24/18	9/26/19	4 1							
	PROJECT IDENTIFIER 82577 16369 82843	PROJECT ITEM DENTIFIER DESCRIPTION 82577 MINIRAL JODO PLO 16369 RED MR-260 82843 MINIRAL JODO PLO	PROJECT IDENTIFIERITEM DESCRIPTIONLAST RECALL82577MINIRAL 3000 PID8 15 1816369RED MP-2008 14 1882843MINIRAL 3000 PID8 14 18	PROJECT IDENTIFIERITEM DESCRIPTIONLAST RECALLNEXT RECALL82577MINIRAL 3000 PID8 15 189 15 1916369REDMP-ZO8 14 188 14 1982843MINIRAL 3000 PIA14 19	PROJECT ITEM LAST NEXT DATE IDENTIFIER ITEM LAST RECALL NEXT DATE 82577 MINIRAL 3000 P10 8 15 18 9 15 19 9 5 18 16369 RECOMP-260 8 14/18 8 14/19 9 19 18 82543 MINIRAL 3000 PIO 8 14 18 8 14 19 9 19 18						

RECORDED BY:

(Signature and Date)

CALIBRATION STANDARD PROJECT NAME: DELIVERY ORDER NO: INCLUSIVE DATES FOR CALIBRATION MATERIAL INSTRUMENT CALIBRATION LOT # NAME USAGE DESCRIPTION MATERIAL * Finish: (0/5/18) Start: 9/ 5/18 1000 PPM Ex 2 3 LOT: 4812207 Ex P: MA/2021 M. KLIDZEJS MINIPAE 3000 PID 130BUTYLEUK ET 763243 10/3/19 QED MP-ZOD DH7 STND 12 07: 568192 2×P: 2/19 AUTO CAL 10/3/18 5-5-10 10/2/18 STAD STAD LOTA ITALISEG 10/B/18 High 107 5078 Erf: 2119 Light 2119 114-11491986 RELP: 4119 10/2/18 10/3/18 HANLID TURBIDITY METER <010NTJ JEB 15HTU STND HALLIN LOT 3131 EXP ILLIS 100 NTU STUP 750 NTU STAD EXT. 12/18 10/3/

* INCLUDE EXPIRATION DATES FOR STANDARD SOLUTIONS

QA CHECKED BY:

PROJECT NAME: SUAD PEAS SI

DELIVERY ORDER NO:

SAMPLE ID NUMBER:	DATE COLLECTED (mm/dd/yy):	
SAMPLE LOCATION:	TIME COLLECTED (hh:mm):	
SAMPLING POINT;	DEPTH:	
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CORDED BY:	DATE OA CHECK BY:	DATE

•	WAS	STE DRUM TRACKIN	IG LOG	
PROJECT NAM	NE:		DELIVERY ORDER	R NO:
DRUM NUMBER	DRUM TYPE AND SIZE	CONTENTS AND APPROXIMATE VOLUME	WASTE SOURCE	GENERATION DATE(S)
SVAD-62184- 5-001	55-CAL, STELL OPEN-TOP	JOIL CUTTINGS	MLI-67AFAS-03	9/5/18
540-67184 - 5-92		S	MUL-GTPFAS-02	9/4/18
5110-67184-			MW-G7AFA5-01	9/6/18
5VAD - 61/84- 5-04			MW-840FAS-03) /
SUAD- CT/BH- 5-05,				9/4/18
SVAD-67/84- 3-06			MW-84PFAS-01	
SUAD-67/84-				9/7/18
5-0A			MW-84PFAS-02	9 7/18
5-09 1 3-09 1	И	V		9/7/10
STAD-GT184-				
-				5 2
		14K /		
		MK plation		
WAO-61184-	55-6AL, STEEL	DICON		elala
140-67/8H- W-02	OPENI-TOP	WASTERIATER AND GROUND WATER		918/18
SUAD-67/84-				
VA0-67/84-				99118-
VI-04 1A0-67/84-				9/9/18
YAN-67/84-				
VAO -17184-				9/10/12
120-67184-				9/14/18
¥1-08	*	V		9 10 18
T		- MK 10/3/10		9-17-18

RECORDED BY: MUlting 10/3/18

QA CHECK BY:

.44

SITE SAFETY & HEALTH OFFICER: M. Kudzess

SUMMARY OF MEETING ACTIVITIES: JOB ACTIVITIES: I) PURCHILLE AND SAMPLING NEW MONITORIAL WELLS; Z) DECON; 3) EQUIPMENT CALIBRATION 4) ION MANAGEMENT. JOB/SITE HARAIZOS 1) WET CONDITIONS Z) SITE CONTRAMINIANTS; 3) SLIPS TRIPS FALLS; 4) CUTS; S) Exposure To CHEMICAL TOOLS (TRIBMA, ISOBUTYLENE) 4) POTENTIAL HEAT STRESS (TOMORROW), NARMRO CONTROLS I) STOP WORK AUTHORITY; Z) PP2 USC, 3) WATCH FRONTIAL FRONTIAL STURE DISCUSSIONS: PFAS PROHIBITIONS.

MK 10/2/1

THE FOLLOWING INDIVIDUALS ATTENDED THE PRE-ENTRY SAFETY & HEALTH TRAINING MEETING:

ignature and Date)

APPENDIX C

TOPOGRAPHIC SURVEY RESULTS

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Table C-1. Topographic Survey Results Savanna Army Depot Activity, Savanna, Illinois

Well I.D.	North	East	Ground Surface Elevation	Elevation of Top of Well Casing
			Site 67	
MW-67PFAS-01	2009874.14	477838.91	605.08	607.46
MW-67PFAS-02	2009598.94	477773.15	605.95	608.32
MW-67PFAS-03	2009430.10	477778.92	600.73	602.81
			Site 84	
MW-84PFAS-01	2010498.38	471326.07	630.13	632.29
MW-84PFAS-02	2010451.04	471250.27	629.78	631.94
MW-84PFAS-03	2010226.62	471216.05	626.13	628.45

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APPENDIX D

DATA QUALITY ASSESSMENT

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APPENDIX D

DATA QUALITY ASSESSMENT

D.1 INTRODUCTION

A comprehensive quality assurance/quality control (QA/QC) program was followed during the Site Inspection conducted in October 2018 by Leidos at Site 67 and Site 84SVAD-084 at Savanna Army Depot Activity (SVDA), Savanna, Illinois, to ensure that analytical results and the decisions based on these results are representative of the environmental conditions. Test America, located in Arvada, Colorado, was the analytical laboratory under contract for the analysis of per- and polyfluoroalkyl substances (PFAS) during the SVAD-067 and SVAD-084 field investigations. Eurofins, located in Lancaster, Pennsylvania, was the analytical laboratory under contract for the split sample analyses of PFAS during the SVAD-067 and SVAD-067 and SVAD-084 field investigations.

D.2 LABORATORY QUALITY CONTROL ASSESSMENT AND VALIDATION REPORT

All environmental samples and field QC samples collected during the SVAD-067 and SVAD-084 field investigations are presented in Table D-1 (all tables are presented at the end of this appendix) and were analyzed using analytical test methods modified per the U.S. Department of Defense (DoD) Quality Systems Manual (QSM) (DoD 2017) Table B-15 requirements, and laboratory standard operating procedures (SOPs) to accommodate environmental samples from the following document:

• U.S. Environmental Protection Agency (USEPA) Method 537 Rev 1.1, Determination of Selected Pefluorinated Alkyl Acids in Drinking Water.

Leidos verified 100 percent of the analytical results produced by the primary laboratory. Data were verified based on the guidelines and specifications in the Uniform Federal Policy Quality Assurance Project Plan (UFP-QAPP) (Leidos 2014), the UFP-QAPP Addendum 2 (Leidos 2018), the DoD QSM, Version 5.1 (DoD 2017), and the USEPA Contract Laboratory Program (CLP) *National Functional Guidelines for Organic Data Review* (USEPA 1999). All available CLP-like Forms (e.g., Forms 1 through 14) were reviewed to ensure that the QC results were within appropriate QC limits for holding times, blank contamination, calibrations, matrix spike/matrix spike duplicates (MS/MSDs), laboratory control samples (LCSs), internal standards (ISs), surrogate standards, detection limits, and any other required QC. All data validation qualifiers that resulted from the Leidos data validation process are presented in Table D-2. The QA split sample results were not validated. The data quality objectives (DQOs) for SVAD-067 and SVAD-084 were set at 90 percent for the field sampling and laboratory completeness. Based on the evaluation of the field and laboratory QC results, the data are 100 percent complete.

A secondary stage of verification occurred once the initial validation had been completed. Individual rinsate blanks, equipment blank, and field blanks associated with the corresponding environmental samples were evaluated following the same criteria as method blanks. All data validation qualifiers applied to the sample data based on blank contamination are discussed in Section D.3.

Third-party data validation was required on 10 percent of the data. Third-party data validation was performed by EcoChem, Inc., located in Seattle, Washington. Full validation consisted of validating the data using the guidelines described above and recalculating a portion of the detected compounds from the raw data. A comprehensive discussion of EcoChem's data validation is provided in Section D.4.

All environmental groundwater and field QC samples collected for the SVAD-067 and SVAD-084 field investigations were submitted to Test America for the analytical methods listed in Section D.2. All available CLP-like Forms (e.g., Forms 1 through 14) were reviewed to ensure that the QC results fell within the appropriate QC limits. Any resulting data validation qualifiers were applied. A data verification report

was prepared for each parameter validated. This section summarizes these parameter-specific data validation reports.

The following data validation qualifiers were applied to the results as dictated by QC outliers:

- *U*—The analyte was analyzed for, but was not detected above the reported sample quantitation limit. These results are qualitatively acceptable.
- *J*—The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample. These results are qualitatively acceptable, but estimates.
- *UJ*—The analyte was not detected above the reported sample quantitation limit. However, the reported quantitation limit is approximate and may or may not represent the actual limit of quantitation necessary to accurately and precisely measure the analyte in the sample. These results are qualitatively acceptable, but estimates.
- *R*—The sample results were rejected due to serious deficiencies in the ability to analyze the sample and meet QC criteria. The presence or absence of the analyte cannot be verified. No data points were rejected.

D.2.1 Sample Shipping/Receiving/Preservation

All chain-of-custody (CoC), analysis request, and sample receipt documentation were complete and correct. All samples were properly preserved.

D.2.2 Technical Holding Times

Based on an evaluation of all samples, all technical holding time criteria were met and no samples required qualification.

D.2.3 Surrogate Standard Recoveries

Surrogates for PFAS were analyzed in accordance with the method. Organic sample results were qualified as estimated (J/UJ) if the associated surrogates were below the lower control limit (LCL). Detected organic sample results were qualified as estimated (J) if the associated surrogates were above the upper control limit (UCL). Non-detected organic sample results were qualified as rejected (R) if the associated surrogates were below 10 percent. All surrogate recoveries were within control limits and no sample results were qualified.

D.2.4 Internal Standard Results

ISs were added in all calibration standards, environmental samples, and QC blanks in accordance with USEPA Method 537 for PFAS. IS results above retention time and/or above percent area recoveries are qualified as estimated (J) for associated analytes. IS results below retention time and/or below \pm 50 percent area recoveries but above 25 percent are qualified as estimated (J/UJ) for associated analytes. No ISs were below \pm 25 percent and no data were rejected. Sample results qualified due to IS performance are summarized in Table D-2 with reason code K01.

PFAS Analysis—IS area counts associated with three results for sample MW-84PFAS-03 had area counts below control limits and were qualified as estimated (J).

D.2.5 Initial Calibration Results

Initial calibration of each instrument used to analyze the samples collected during the SVAD-067 and SVAD-084 field investigation sampling was conducted in accordance with the methods. Based on the

laboratory summary narrative and evaluation of the initial calibration analyses conducted, all criteria were met.

D.2.6 Continuing Calibration Results

Continuing calibration of each instrument used to analyze the samples collected during the SVAD-067 and SVAD-084 field investigation sampling was conducted in accordance with the methods. Organic sample results were qualified as estimated (J/UJ) if the associated continuing calibration verification (CCV) was below the LCL. Detected organic sample results were qualified as estimated CCV was above the UCL. No results were qualified due to CCV results.

D.2.7 Method Blank Results

Method blanks were analyzed with each batch (i.e., sample delivery group [SDG]) of samples in accordance with the methods. Any target compounds detected in the method blanks were below the allowable levels as defined by the analytical methods. No results were qualified due to blank contamination. Equipment rinsate blank and field blank analyses are discussed in Section D.3.

D.2.8 Calibration Blank results

Initial calibration blanks (ICBs) and continuing calibration blanks (CCBs) were analyzed with each batch (i.e., SDG) of PFAS analyses. Any analyte detected in the ICBs and/or CCBs were below the allowable levels as defined by the analytical method. Table D-2 lists the sample results that were qualified due to ICB/CCB contamination with reason code F06.

PFAS Analysis—Two perfluorohexane sulfonate (PFHxS) and one perfluoroheptanoic acid (PFHpA) results were qualified as non-detect (U) due to CCB contamination.

D.2.9 Laboratory Control Sample Recovery Results

The LCS monitors the overall accuracy and performance of all steps in the analysis, including the preparation, and was prepared and analyzed in accordance with the methods.

Sample results associated with LCS values outside of acceptance limits are qualified according to the following guidelines. Results associated with LCS recoveries below the LCL but greater than the rejection point should be qualified as estimated (J/UJ). Detected results associated with LCS recoveries above the UCL should be qualified as estimated (J). Sample nondetections are rejected (R) if LCS recoveries are less than 30 percent for organic analysis. No sample results were qualified due to LCS recoveries.

D.2.10 Matrix Spike/Matrix Spike Duplicate Recovery Results

MS/MSD analyses were conducted to assess the accuracy and precision of the analytical system and to evaluate the matrix effect of the sample upon the analytical methodology based upon the percent recovery of each compound. Sample results associated with MS/MSD recoveries outside of acceptance limits are qualified according to the following guidelines. Only native sample results associated with MS/MSD outliers should be qualified according to the latest DoD QSM guidance (DoD 2017). Native sample nondetects are rejected (R) if MS/MSD recoveries are less than 10 percent for organic analyses. MS/MSD recoveries above the UCL result in estimation (J) of detected compounds in the native samples. In addition, if the spiking concentration is less than 25 percent of the native concentration, no action is taken for noncompliant recoveries because the spike level is considered insignificant compared to the native sample concentration. No sample results were qualified due to MS/MSD recoveries.

D.2.11 Matrix Spike/Matrix Spike Duplicate Relative Percent Difference Results

The MS/MSD relative percent difference (RPD) is used to evaluate the precision of the analytical system. Native sample results associated with MS/MSD RPD values outside acceptance limits should be qualified as estimated (J/UJ). No sample results were qualified due to MS/MSD RPD results.

D.2.12 Target Compound Identification

The target compounds that were reported as detects satisfied all qualitative and quantitative identification as specified in the USEPA methods. No problems were encountered that would affect target compound identification.

D.2.13 Reporting Limits

All reporting limit criteria specified in the UFP-QAPP (Leidos 2014) and Addendum 2 to the UFP-QAPP (Leidos 2018) were met for the field investigations, except in instances where dilutions were required. In instances where dilutions were required, lesser diluted analyses were used wherever possible.

D.2.14 System Performance

Based on instrument performance indicators, all analytical systems remained within control throughout the duration of the SVAD-067 and SVAD-084 field investigations with the exceptions noted above.

D.3 FIELD QUALITY CONTROL ASSESSMENT

During all activities conducted as part of the UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018), QC samples were collected to gauge the impacts from various components of field activities. Field QC samples were obtained to determine the degree of cross-contamination, ensure successful decontamination procedures, or determine the effects of media heterogeneity on results. Rinsate blanks, equipment blanks, and field blanks provide a measure of various cross-contamination, decontamination efficiency, and other potential error that can be introduced from sources other than the sample. Field sample results associated with uncommon laboratory contaminants found in field QC blanks are considered nondetect if they are at concentrations less than five times the level found in the associated blank. No results were qualified due to field and equipment blank contamination.

Field duplicates were collected to ascertain the contribution of variability (i.e., precision) due to environmental media and sampling precision techniques. Results for the primary and field duplicate samples with detected concentrations are presented in Table D-3. All results were below the 30 percent control limits or were within three times the sample-specific limit of quantitation (LOQ) when the results for both the primary and field duplicate samples were less than five times the sample-specific LOQ.

D.3.1 QA Split Analysis

One field sample was split from the primary samples and sent to a third-party independent laboratory referred to as the QA laboratory. The analysis of QA split samples provides an overall measure of field and laboratory accuracy and precision. Examination of the primary and QA split sample data provides the data user with a degree of acceptance and usability of the chemical data quality. The QA split sample did not undergo data validation by Leidos or the third-party data validator. The QA laboratory for the SVAD-067 and SVAD-084 SI was Eurofins.

Primary and QA laboratory data were assessed using guidelines provided in the Louisville QSM Supplement (USACE 2007). Louisville QSM supplement guidelines suggest that primary and QA split sample data should have a difference of less than two times between the primary and QA sample in order to be considered in agreement for all water analyses. If sample results are less than the reporting limit, a difference of three times between the primary and QA split sample is allowed. In addition, when one

compound or analyte is less than the detection limit, the allowable difference is five times between the primary and QA split sample.

Louisville QSM Supplement guidelines consider compounds or analytes to be in major disagreement if water results have a difference factor of greater than three. In addition, compounds or analytes are in major disagreement if results have a difference factor greater than 5 when one compound or analyte is below the reporting limit, and a major disagreement if results have a difference factor greater than 10 when one compound or analyte is below the detection limit.

Table D-4 provides a comparison of the primary and QA split detected results. All compounds or analytes were detected and included in the table. Sample results that were detected above the reporting limit by both the primary laboratory and the QA laboratory were all in good agreement according to Louisville QSM Supplement guidelines. No samples were in disagreement. The reproducibility between the primary and QA split sample are considered acceptable.

D.4 THIRD-PARTY DATA VALIDATION ASSESSMENT

Third-party full data validation was required on 10 percent of the SVAD-067 and SVAD-084 sample results. Third-party data validation was performed by EcoChem. Full validation consisted of validating the data using the QC data reported by the laboratory against required precision and accuracy limits established in the DoD QSM (DoD 2017) and against QC requirements outlined in the Louisville QSM Supplement (USACE 2007), UFP-QAPP (Leidos 2014) and UFP-QAPP Addendum 2 (Leidos 2018). The following sections summarize all discrepancies between EcoChem's data validation findings and qualifiers and Leidos' data verification qualifiers.

D.4.1 EcoChem Findings

All chemical of concern (COC), analysis request, and sample receipt documentation was complete and correct. The Laboratory Information Management System (LIMS) number, number of coolers, and signature lines were completed for all cooler receipt checklists. The samples were analyzed within the prescribed holding time and properly preserved except where noted. All calibrations, blanks, ISs, surrogates, LCSs, MS/MSDs, and target compound identification were reviewed where appropriate with respect to criteria contained within the documents described in Section D.3. Sample results were qualified for any QC outliers. All recalculations were in agreement with the reported results.

D.4.2 Data Verification/Data Validation Comparison

The following sections and Table D-5 provide a comparison of Leidos' data verification applied qualifiers and EcoChem's data validation applied qualifiers. Some discrepancies existed due to differences in professional judgment used during the verification or validation process as well as fundamental differences between the verification process and the validation process (i.e., the verification process does not involve examining raw data and the validation process requires examining and recalculating raw data). It was not part of EcoChem's scope to validate based on field QC blanks. In all instances, discrepancies in the applied qualifiers were reviewed for the cause of the discrepancy. In each case, a final qualifier was applied based on Leidos' professional judgment. EcoChem's validation reports are provided in Attachment A of this appendix. Table D-5 provides a summary of instances where Leidos' initial data verification qualifiers were not in agreement.

PFAS Analysis—Leidos qualified some sample results due to injection IS discrepancies. USEPA Method 537 Revision 1.1 allows injection ISs to be within 50 to 150 percent of the IS area counts of the initial calibration midpoint or CCV standard. EcoChem used the TestAmerica SOP control limits (UCL of ± 200 percent per TestAmerica SOP) where no qualification was required due to a wider range of control limits. Leidos qualified three data points as estimated, with reason code K01, because the injection IS was

greater than 150 percent but less than 200 percent, which explains EcoChem's lack of qualifiers due to IS area count outliers. No changes were made to the Leidos-applied qualifiers in these instances.

EcoChem did not apply qualifiers based on continuing calibration blanks. Leidos qualified three results based on calibration blank contamination. No changes were made to the Leidos-applied qualifiers.

EcoChem reported some results with a "DNR" with reason code 20 when the data were above the calibration range of the instrument. Leidos was in agreement in these instances. EcoChem reported some results with "DNR" with reason code 11 for all other data points from dilutions, but not above calibration. In three of these instances, Leidos chose to use the diluted result because the diluted result value was higher than the undiluted result value. None of the Leidos-applied qualifiers were changed in these instances.

Overall, the differences between Leidos' verification qualifiers and Ecochem's validation qualifiers have no impact on the final usability of the data. In instances where the discrepancies were based on professional judgment or where EcoChem's validation protocol differed from the DoD QSM (DoD 2017) protocol or the UFP QAPP (Leidos 2014) and/or UFP-QAPP Addendum 2 (Leidos 2018), no changes were made to the Leidos-applied qualifiers.

D.5 REFERENCES

- DoD (U.S. Department of Defense). 2017. Quality Systems Manual for Environmental Laboratories. Version 5.1. Final. January.
- Leidos. 2014. Uniform Federal Policy Quality Assurance Project Plan (UFP-QAPP) for Remedial Investigation at SVAD-045 and SVAD-222. Final. Savanna Army Depot Activity, Savanna, Illinois. Prepared for the U.S. Army Corps of Engineers, Louisville District. November.
- Leidos. 2018. Addendum 2 Site Inspection at SVAD-067 and SVAD-084. Savanna Army Depot Activity, Savanna, Illinois. Final. Prepared for the U.S. Army Corps of Engineers, Louisville District. August.
- USACE (U.S. Army Corps of Engineers). 2007. DOD Quality Systems Manual Supplement. USACE Louisville District. March.
- USEPA (U.S. Environmental Protection Agency). 1999. Contract Laboratory Program National Functional Guidelines for Organic Data Review. EPA 540-R-01-008. October.

Site I.D.	Sample I.D.	Matrix	Sample Date	Analyses
MW-67PFAS-01	LDOS01	W	10/02/2018	PFAS
MW-67PFAS-01	LDOS01N	W	10/02/2018	PFAS
MW-67PFAS-01	LDOS01ND	W	10/02/2018	PFAS
MW-67PFAS-01	LDOS01X	W	10/02/2018	PFAS
MW-67PFAS-02	LDOS01	W	10/02/2018	PFAS
MW-67PFAS-02	LDOS01D	W	10/02/2018	PFAS
MW-67PFAS-02	LDOS0EB01	W	10/02/2018	PFAS
MW-67PFAS-02	LDOS0FB02	W	10/02/2018	PFAS
MW-67PFAS-03	LDOS01	W	10/02/2018	PFAS
MW-67PFAS-03	LDOS0FB01	W	9/05/2018	PFAS
MW-84PFAS-01	LDOS01	W	10/03/2018	PFAS
MW-84PFAS-01	LDOSRB01	W	10/03/2018	PFAS
MW-84PFAS-02	LDOS01	W	10/03/2018	PFAS
MW-84PFAS-03	LDOS01	W	10/02/2018	PFAS

Table D-1. Sample Summary SVAD-067 and SVAD-084 Savanna Army Depot, Savanna, Illinois

Table D-2. Leidos Applied Data Validation Qualifiers SVAD-067 and SVAD-084 Savanna Army Depot, Savanna, Illinois

Site I.D.	Sample I.D.	Matrix	Method	Analyte	Validation Qualifier	Reason Code 1
MW-84PFAS-01	LDOSRB01	W	USEPA 537	Perfluorohexanesulfonic acid	U	F06
MW-67PFAS-01	LDOS01	W	USEPA 537	Perfluoroheptanoic acid	U	F06
MW-84PFAS-03	LDOS01	W	USEPA 537	Perfluorohexanesulfonic acid	J	K01
MW-84PFAS-03	LDOS01	W	USEPA 537	Perfluorooctane sulfonate	J	K01
MW-84PFAS-03	LDOS01	W	USEPA 537	Perfluorononanoic acid	J	K01
MW-84PFAS-01	LDOS01	W	USEPA 537	Perfluorohexanesulfonic acid	U	F06

F06 – Continuing calibration blank contamination K01 – Injection internal standard area count outside control limits

Table D-3. Field Duplicate SVAD-067 and SVAD-084 Savanna Army Depot, Savanna, Illinois

Site ID	Sample I.D.	Method	Analyte	Parent Result	Parent Qualifier	Duplicate Result	Duplicate Qualifier	Units	RPD
MW-67PFAS-02	LDOS01	EPA 537	Perfluorobutanesulfonic acid	3.1		3.3		ng/L	6.2
MW-67PFAS-02	LDOS01	EPA 537	Perfluoroheptanoic acid	19		19		ng/L	0
MW-67PFAS-02	LDOS01	EPA 537	Perfluorohexanesulfonic acid	52		51		ng/L	1.9
MW-67PFAS-02	LDOS01	EPA 537	Perfluorononanoic acid	0.69	J	1.2	J	ng/L	53.9
MW-67PFAS-02	LDOS01	EPA 537	Perfluorooctane sulfonate	160		170		ng/L	6.1
MW-67PFAS-02	LDOS01	EPA 537	Perfluorooctanoic acid	200		200		ng/L	0

Table D-4. Split Sample SVAD-067 and SVAD-084 Savanna Army Depot, Savanna, Illinois

Site ID	Sample I.D.	Method	Analyte	Parent Result	Parent Qualifier	Duplicate Result	Duplicate Qualifier	Units	Agreement
MW-67PFAS-01	LDOS01	USEPA 537	Perfluorobutanesulfonic acid	3.4		3.3		ng/L	Y
MW-67PFAS-01	LDOS01	USEPA 537	Perfluoroheptanoic acid	1.9	U	1.9		ng/L	Y
MW-67PFAS-01	LDOS01	USEPA 537	Perfluorohexanesulfonic acid	99		100		ng/L	Y
MW-67PFAS-01	LDOS01	USEPA 537	Perfluorononanoic acid	1.4	J	1.25	J	ng/L	Y
MW-67PFAS-01	LDOS01	USEPA 537	Perfluorooctane sulfonate	33		34		ng/L	Y
MW-67PFAS-01	LDOS01	USEPA 537	Perfluorooctanoic acid	350		340		ng/L	Y

Table D-5. Third Party Data Validation SVAD-067 and SVAD-084 Savanna Army Depot, Savanna, Illinois

Client Sample ID	Matrix	CAS	Analyte	Result	Unit	Lab Flag	Dil	Leidos DV Qualifier	Leidos DV Reason Code	Third Party DV Qualifier	Third Party DV Reason Code	Final Qualifier	Resolution
MW-84PFAS-01 LDOSRB01	Water	355-46-4	PFHxS	0.44	ng/L	J	1	0.83 U	F06	None	None	U	Third party did not evaluate CCBs; Leidos did evaluate CCBs
MW-84PFAS-01 LDOS01	Water	375-85-9	PFHpA	1.3	ng/L	J	1	1.3 U	F06	None	None	U	Third party did not evaluate CCBs; Leidos did evaluate CCBs
MW-84PFAS-02 LDOS01	Water	355-46-4	PFHxS	420	ng/L	J1	1	DNU	N/A	DNR	20	N/A	Agree
MW-84PFAS-02 LDOS01	Water	375-73-5	PFBS	110	ng/L	D	5	DNU	N/A	DNR	11	N/A	Agree
MW-84PFAS-02 LDOS01	Water	375-85-9	PFHpA	22	ng/L	DM	5	None	None	DNR	11	None	Used diluted value because it's higher (1X = 20 ng/L)
MW-84PFAS-02 LDOS01	Water	375-95-1	PFN/A	6.9	ng/L	U	5	DNU	N/A	DNR	11	N/A	Agree
MW-84PFAS-02 LDOS01	Water	1763-23-1	PFOS	120	ng/L	D	5	DNU	N/A	DNR	11	N/A	Agree
MW-84PFAS-02 LDOS01	Water	335-67-1	PFOA	13	ng/L	DM	5	DNU	N/A	DNR	11	N/A	Agree
MW-67PFAS-01 LDOS01	Water	375-85-9	PFHpA	1.9	ng/L	М	1	U	F06	None	None	U	Third party did not evaluate CCBs; Leidos did evaluate CCBs
MW-67PFAS-03 LDOS01	Water	355-46-4	PFHxS	430	ng/L	J1	1	DNU	N/A	DNR	20	N/A	Agree
MW-67PFAS-03 LDOS01	Water	335-67-1	PFOA	450	ng/L	J1	1	DNU	N/A	DNR	20	N/A	Agree
MW-67PFAS-03 LDOS01	Water	375-73-5	PFBS	6.2	ng/L	JD	5	None	None	DNR	11	None	Used diluted value because it's higher (1X = 5.9)
MW-67PFAS-03 LDOS01	Water	375-85-9	PFHpA	16	ng/L	DM	5	DNU	N/A	DNR	11	N/A	Agree
MW-67PFAS-03 LDOS01	Water	375-95-1	PFN/A	6.7	ng/L	U	5	DNU	N/A	DNR	11	N/A	Agree
MW-67PFAS-03 LDOS01	Water	1763-23-1	PFOS	100	ng/L	D	5	DNU	N/A	DNR	11	N/A	Agree
MW-84PFAS-03 LDOS01	Water	355-46-4	PFHxS	1000	ng/L	D	10	J	K01	None	None	J	Third party did not qualify for IS outliers >150% (only >200%)
MW-84PFAS-03 LDOS01	Water	355-46-4	PFHxS	850	ng/L	J1	1	DNU	N/A	DNR	20	N/A	Agree
MW-84PFAS-03 LDOS01	Water	375-95-1	PFN/A	1900	ng/L	D	10	J	K01	None	None	J	Third party did not qualify for IS outliers >150% (only >200%)
MW-84PFAS-03 LDOS01	Water	375-95-1	PFN/A	1700	ng/L	J1	1	DNU	N/A	DNR	20	N/A	Agree
MW-84PFAS-03 LDOS01	Water	1763-23-1	PFOS	530	ng/L	D	10	J	K01	None	None	J	Third party did not qualify for IS outliers >150% (only >200%)
MW-84PFAS-03 LDOS01	Water	1763-23-1	PFOS	560	ng/L	J1	1	DNU	N/A	DNR	20	N/A	Agree
MW-84PFAS-03 LDOS01	Water	375-73-5	PFBS	45	ng/L	D	10	None	None	DNR	11		Used diluted value because it's higher (1X = 44)
MW-84PFAS-03 LDOS01	Water	375-85-9	PFHpA	14	ng/L	U	10	DNU	N/A	DNR	11	N/A	Agree
MW-84PFAS-03 LDOS01	Water	335-67-1	PFOA	160	ng/L	D	10	DNU	N/A	DNR	11	N/A	Agree

11 = Do not report; value from another dilution used 20 = Calibration range Exceeded CCB = Continuing calibration blank D = Value from dilution DNR = Do not report

DNU = Data point not used F06 = Continuing calibration blank contamination

IS = Internal standard J = Value between DL and LOQ or value considered an estimate J1 = Value greater than calibration range of the instrument K01 = Injection internal standard area count outside control limits

M = Manually integratedN/A = Not applicable U = Non-detect

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ATTACHMENT A

ECOCHEM DATA VALIDATION REPORT

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ATTACHMENT A

ECOCHEM DATA VALIDATION REPORT

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DATA VALIDATION REPORT

SITE INSPECTION AT SVAD-067 AND SVAD-084 SAVANNA ARMY DEPOT

Savanna, IL

Prepared for:

Leidos 11951 Freedom Drive Reston, VA 20190

Prepared by:

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EcoChem Project Number: C4160-1

November 15, 2018

Approved for Release:

Christine Ransom Senior Project Chemist EcoChem, Inc.

PROJECT NARRATIVE

INTRODUCTION

This report documents the results of the full (EPA Stage 4) data validation performed for groundwater and associated quality control data collected in support of the Savanna Army Depot Site Inspection project.

Samples were analyzed by Test America, Sacramento, CA. Data were validated by the following EcoChem, Inc. chemists:

Теят	Method	Primary Review Chemist	Secondary Review Chemist
Perfluorinated Organic Compounds by LCMS	EPA537Mod (TA SOP)	C. Ransom	C. Frans

The data validation process and measurement quality objectives (MQO) were based on requirements and guidance found in the laboratory Standard Operating Procedure WS-LC-0025, Rev 1.9 *Perfluorinated Compounds (PFCs) in Water, Soils, Sediments and Tissue [Method 537 modified]* (TestAmerica, 05/27/2016) and the *Addendum 2, Uniform Federal Policy Quality Assurance Project Plan, Site Inspection at SVAD-067 and SVAD-084, Savanna Army Depot Activity, Savanna, Illinois* (Leidos., August 2018); and the USEPA *National Functional Guidelines for Organic Data Review* (Aug 2014).

EcoChem's goal in assigning qualifiers is to assist in proper data interpretation. If values are assigned a J or UJ, data may be used for site evaluation and risk assessment purposes, but reasons for data qualification should be taken into consideration when interpreting sample concentrations. If values are assigned an R or DNR, the data should not be used for any site evaluation purposes. If values have no data qualifier assigned, then the data meet all measurement quality objectives as stated in the documents and methods referenced in this report.

The overall quality of the data is acceptable. No data were qualified. Data were flagged DNR to indicate which results should not be used from multiple reported analyses. All data not flagged DNR are acceptable for use. Completeness is 100%. Data validation criteria, developed from the analytical method, the QAPP, and EPA Functional Guidelines, are included in **APPENDIX A**. A Qualified Data Summary Table is presented in **APPENDIX B**.

Sample Index Savanna Army Depot

			Perfluorinated
Sample ID	Laboratory ID	Matrix	Compounds
MW-67PFAS01 LD0501	280-115117-1	Groundwater	\checkmark
MW-67PFAS01 LD0501N	280-115117-2	Groundwater	\checkmark
MW-67PFAS01 LD0501ND	280-115117-3	Groundwater	\checkmark
MW-67PFAS-02 LD05EB01	280-115117-4	Rinsate Blank	\checkmark
MW-67PFAS-02 LD05FB02	280-115117-5	DI Source	\checkmark
MW-67PFAS-02 LD0501	280-115117-6	Groundwater	\checkmark
MW-67PFAS-02 LD0501D	280-115117-7	Groundwater	\checkmark
MW-67PFAS-03 LD0501	280-115117-8	Groundwater	\checkmark
MW-84PFAS-03 LD0501	280-115117-9	Groundwater	\checkmark
MW-84PFAS-01 LD05RB01	280-115117-11	Reagent Blank	\checkmark
MW-84PFAS-01 LD0501	280-115117-12	Groundwater	\checkmark
MW-84PFAS-02 LD0501	280-115117-13	Groundwater	\checkmark

DATA VALIDATION REPORT Savanna Army Depot Perfluorinated Compounds by EPA Method 537 Liquid Chromatography Mass Spectrometry (LCMS)

This report documents the review of analytical data from the analysis of groundwater samples and the associated laboratory and field quality control (QC) samples. Samples were analyzed by TestAmerica, Sacramento, California. Refer to the **Sample Index** for a complete list of samples.

SDG	Number of Samples	VALIDATION LEVEL
J115117-1	9 Groundwater, 3 Field Blank	EPA Stage 4

DATA PACKAGE COMPLETENESS

The laboratory submitted all required deliverables for a full validation. The laboratory followed adequate corrective action processes and any anomalies were discussed in the case narrative.

EDD TO HARDCOPY VERIFICATION

A verification of the electronic data deliverable (EDD) results to the hardcopy was performed. The transcription errors were noted.

The laboratory logged in samples with an ID sequence of "LD05" instead of "LDOS". No action was taken other than to note the discrepancy.

TECHNICAL DATA VALIDATION

The QC requirements that were reviewed are listed below.

\checkmark	Sample Preservation and Holding Times	1	Matrix Spikes/Matrix Spike Duplicates ((MS/MSD)
\checkmark	✓ Initial Calibration (ICAL)		Field Duplicates
\checkmark	Continuing Calibration (CCAL)	\checkmark	Target Analyte List
\checkmark	Laboratory Blanks	\checkmark	Reporting Limits
1	Field Blanks	1	Reported Results
\checkmark	Labeled Surrogate Compounds	\checkmark	Compound Identification
\checkmark	Laboratory Control Samples (LCS/LCSD)	\checkmark	Calculation Verification

 $\sqrt{}$ Stated method quality objectives (MQO) and QC criteria have been met. No outliers are noted or discussed

1 Quality control issues are discussed below, but no data were qualified.

2 Quality control outliers that impact the reported data were noted. Data qualifiers were issued as discussed below.

Sample Preservation and Holding Times

As stated in the validation guidance documents, sample shipping coolers should arrive at the laboratory within the advisory temperature range of 2° to 6°C. The laboratory received the sample coolers within the advisory range.

All samples were extracted within the holding time of 14 days from collection and were analyzed within the holding time of 28 days from extraction.

Initial Calibration (ICAL)

The initial calibration (ICAL) percent relative standard deviation (%RSD) values were within the control limit of 20%.

The independent source initial calibration verification (ICV) percent difference (%D) values were within the criteria of $\pm 30\%$.

Continuing Calibration (CCAL)

A continuing calibration verification standard was analyzed at the I required frequency: at the start of an analysis sequence, every 10 samples, and at the end of the analysis sequence. All %D values were within the criteria of \pm 30%. A low level CCV at the LOQ was also analyzed at the beginning of every sequence with acceptable recoveries.

Laboratory Blanks

A method blank was analyzed at the required frequency of one per extraction batch. No target analytes were detected in the method blank at levels greater than ½ the limit of quantitation (LOQ) as per QAPP requirements.

Field Blanks

Three field blanks were submitted: one rinsate blank MW-67PFAS-02 LD05EB01; one DI source water MW-67PFAS-02 LD05FB02; and one trizma preserved reagent blank MW-84PFAS-01 LD05RB01. No target analytes were detected in these blanks at levels greater than ½ LOQ as per QAPP requirements. There was a positive result less than the limit of detection (LOD) but greater than the detection limit (DL) for PFHxS in the reagent blank. This result was not used to evaluate potential contamination in the field samples as they did not require trizma preservation.

Labeled Surrogate Compounds

One labeled surrogate compound specific to each target analyte was added to all samples. All recoveries were within the QAPP specified control limits of 50-150%.

Laboratory Control Samples

Laboratory control sample/laboratory control sample duplicates (LCS/LCSD) were analyzed at the required frequency of one per batch of 20 or fewer samples. All recoveries were within the QAPP specified control limits. The relative percent difference (RPD) values were also within the QAPP specified limit of 30%.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicates were not analyzed. The laboratory control sample/laboratory control sample duplicate (LCS/LCSD) analyses were used to evaluate precision and accuracy.

Field Duplicates

The RPD control limit is 30% for results greater than 5x the LOQ. For results less than 5x the LOQ, the difference between the sample and duplicate must be less than the 3x the LOQ.

One set of field duplicates were submitted: MW-67PFAS-02 LDOS01 and MW-67PFAS-02 LDOS01D. All RPD and difference values were less than the control limits.

Target Analyte List

All requested target analytes were reported.

Reporting Limits

Reporting limits were adjusted correctly for sample aliquot size. All LOD and LOQ values met those specified in the QAPP and were less than the project action limits.

Compound Identification

All criteria for compound identification were met.

Reported Results

Several samples were re-analyzed at dilution due to high concentrations of one or more target analytes. The following dilutions were analyzed:

Sample ID	Lab ID	DF	AFFECTED ANALYTES
MW-67PFAS-03 LDOS01	280-115117-8	5X	PFHxS, PFOA
MW-84PFAS-03 LDOS01	280-115117-9	10X	PFHxS, PFNA, PFOS
MW-84PFAS02 LDOS01	280-115117-13	5X	PFHxS

Results for both sets of analyses were reported. The results that exceeded the calibration range in the original analysis were flagged as do-not-report (DNR-20). The results for all other analytes in the dilutions were flagged as do-not-report (DNR-11).

Calculation Verification

Several results were verified by recalculation from the raw data. Recalculations were done for Sample MW-84PFAS-03 LDOS01. No calculation or transcription errors were found.

OVERALL ASSESSMENT

As determined by this evaluation, the laboratory followed the specified analytical procedure. Accuracy was acceptable as demonstrated by the labeled compound and LCS/LCSD recovery values. Precision was also acceptable as demonstrated by the LCS/LCSD and field duplicate RPD values.

Data were flagged as do-not-report (DNR) to indicate which results should not be used form multiple reported analyses. A usable result remains for all analytes in all samples; completeness was not affected.

Data flagged DNR should not be used. All other data, as reported, are acceptable for use.



APPENDIX A

DATA QUALIFIER DEFINITIONS REASON CODES AND CRITERIA TABLES

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DATA VALIDATION QUALIFIER CODES Based on National Functional Guidelines

The following definitions provide brief explanations of the qualifiers assigned to results in the data review process.

U	The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
J	The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.
NJ	The analysis indicates the presence of an analyte that has been "tentatively identified" and the associated numerical value represents the approximate concentration.
UJ	The analyte was not detected above the reported sample quantitation limit. However, the reported quantitation limit is approximate and may or may not represent the actual limit of quantitation necessary to accurately and precisely measure the analyte in the sample.
R	The sample results are rejected due to serious deficiencies in the ability to analyze the sample and meet quality control criteria. The presence or absence of the analyte cannot be verified.
The following is an EcoChem	qualifier that may also be assigned during the data review process:

DNR Do not report; a more appropriate result is reported from another analysis or dilution.

DATA QUALIFIER REASON CODES

Group	Code	Reason for Qualification
Sample Handling	1	Improper Sample Handling or Sample Preservation (i.e., headspace, cooler temperature, pH, summa canister pressure); Exceeded Holding Times
	24	Instrument Performance (i.e., tune, resolution, retention time window, endrin breakdown, lock-mass)
	5A	Initial Calibration (RF, %RSD, r ²)
Instrument Performance	5B	Calibration Verification (CCV, CCAL; RF, %D, %R) Use bias flags (H,L) ¹ where appropriate
	5C	Initial Calibration Verification (ICV %D, %R) Use bias flags (H,L) ¹ where appropriate
	6	Field Blank Contamination (Equipment Rinsate, Trip Blank, etc.)
Blank Contamination	7	Lab Blank Contamination (i.e., method blank, instrument blank, etc.) Use low bias flag (L) ¹ for negative instrument blanks
	8	Matrix Spike (MS and/or MSD) Recoveries Use bias flags (H,L) ¹ where appropriate
	9	Precision (all replicates: LCS/LCSD, MS/MSD, Lab Replicate, Field Replicate)
Precision and Accuracy	10	Laboratory Control Sample Recoveries (a.k.a. Blank Spikes) Use bias flags (H,L) ¹ where appropriate
	12	Reference Material Use bias flags (H,L) ¹ where appropriate
	13	Surrogate Spike Recoveries (a.k.a. labeled compounds, recovery standards) Use bias flags (H,L) ¹ where appropriate
	16	ICP/ICP-MS Serial Dilution Percent Difference
	17	ICP/ICP-MS Interference Check Standard Recovery Use bias flags (H,L) ¹ where appropriate
Interferences	19	Internal Standard Performance (i.e., area, retention time, recovery)
	22	Elevated Detection Limit due to Interference (i.e., chemical and/or matrix)
	23	Bias from Matrix Interference (i.e. diphenyl ether, PCB/pesticides)
	2	Chromatographic pattern in sample does not match pattern of calibration standard
	3	2 nd column confirmation (RPD or %D)
Identification and Quantitation	4	Tentatively Identified Compound (TIC) (associated with NJ only)
	20	Calibration Range or Linear Range Exceeded
	25	Compound Identification (i.e., ion ratio, retention time, relative abundance, etc.)
N.C II	11	A more appropriate result is reported (multiple reported analyses i.e., dilutions, re- extractions, etc. Associated with "R" and "DNR" only)
Miscellaneous	14	Other (See DV report for details)
	26	Method QC information not provided

¹H = high bias indicated

L = low bias indicated

Table: PFC-LC/MS/MS Revision No.: 0 Last Rev. Date: 08/24/16 Page: 1 of 3

Perfluorinated Compounds by Liquid Chromatography- Mass Spectrometry (LC/MS) (Based on TestAmerica Sacramento Standard Operating Procedure and EPA 537)

QC Element	Acceptance Criteria	Source of Criteria	Action for Non-Conformance	Reason Code	Discussion and Comments
Sample Handling					
Cooler/Storage Temperature Preservation	PTFE free containers store at < 4 +/-2°C from collection	TA SOP ⁽¹⁾	If required by project: J (pos)/UJ (ND) if greater than 6° C	1	Use PJ for temp outliers; see TM20
Holding Time	Extraction: 14 days from collection Analysis: 28 days from extraction	QAPP ⁽²⁾ J (pos)/UJ (ND) if HT exceeded J (pos)/R (ND) if gross exceedance (> 2x HT)		1	
Instrument Performance					
Initial Calibration %RSD of RRF< 20.0% or linear regression r ² >0.990 std within 80%-120% of true value (50%-150% for std conc. <2x RL)		TA SOP ⁽¹⁾	J (pos) if %RSD > 20%	5A	
Initial Calibration Verification (ICV)			J (pos) if %D >30% (high bias) J (pos)/UJ (ND) if %D <- 30% (low bias)	5A (H,L) ³	
Continuing Calibration Verification (CCV)	5 I I I I I I I I I I I I I I I I I I I		J (pos) if %D >30% (high bias) J (pos)/UJ (ND) if %D <- 30% (low bias)	5B (H,L) ³	
Blank Contamination					
Method Blank (MB)	MB: One per matrix per batch of (of ≤ 20 samples) No detected compounds > 1/2 LOQ	QAPP ⁽²⁾	U(pos) if sample result is < 5X blank concentration	7	Hierarchy of blank review: #1 - Review MB, qualify as needed
Field Blank (FB)	No detected compounds > 1/2 LOQ	QAPP ⁽²⁾ U(pos) if sample result is < 5X blank concentration		6	#2 - Review FB , qualify as needed
Precision and Accuracy					
Laboratory Control Sample (LCS)	One per lab batch (of ≤ 20 samples) Limiits Specified in QAPP DoD QSM	QAPP ⁽²⁾	Qualify all associated samples J(pos) if %R > UCL J(pos)/UJ(ND) if %R < LCL J(pos)/R(ND) if %R < 10% - very low bias	10 (H,L) ³	PJ - No action if LCSD analyzed and only one spike %R is outside criteria Qualify all associated samples
LCS/LCSD (RPD)	If LCSD analyzed RPD <30%	QAPP ⁽²⁾	J (pos) if RPD > control limit	9	Qualify all associated samples

Table: PFC-LC/MS/MS Revision No.: 0 Last Rev. Date: 08/24/16 Page: 2 of 3

Perfluorinated Compounds by Liquid Chromatography- Mass Spectrometry (LC/MS) (Based on TestAmerica Sacramento Standard Operating Procedure and EPA 537)

QC Element	Acceptance Criteria	Source of Criteria	Action for Non-Conformance	Reason Code	Discussion and Comments	
Matrix Spike or MS/MSD (recovery)	one per matrix per batch (of ≤ 20 samples) Limiits Specified in QAPP DoD QSM	QAPP ⁽²⁾	Qualify parent only unless other QC indicates systematic problems: J(pos) if both %R > UCL J(pos)/UJ(ND) if both %R < LCL J(pos)/R(ND) if both %R < 10% J(pos)/UJ(ND) if one > UCL & one < LCL, with no bias	8 (H,L) ³	No action if only one spike %R is outside criteria. No action if parent concentration is >4x the amount spiked. These are default limits from SOP; lab may provide statistically derived limits Qualify parent sample only	
MS/MSD (RPD)	If MSD analyzed RPD \leq 30% (Aqueous)	QAPP ⁽²⁾	J(pos) in parent sample if RPD > CL	9	Qualify parent sample only	
Internal Standard	50%-150% of ICAL midpoint or CCV RT within 60 seconds of most recent CCV	TA SOP ⁽¹⁾ QAPP ⁽²⁾	J (pos) if > 200% J (pos)/UJ (ND) if < 50% J (pos)/R (ND) if < 25% if RT >30 seconds use PJ	19		
Surrogates	Labeled Compounds added to all samples Aqueous: 50%-150%	TA SOP ⁽¹⁾ QAPP ⁽²⁾	J (pos) if %R > UCL J (pos)/UJ (ND) if %R < LCL J (pos)/R (ND) if %R < 10%	13 (H,L) ³	Qualify all associated compounds. These are default limits from SOP; lab may provide statistically derived limits	
Field Duplicates	Aqueous: RPD < 30% OR difference < 3X LOQ (for results < 5X LOQ)	QAPP ⁽²⁾	J (pos)/UJ (ND) Qualify only parent and field duplicate samples	9		

Table: PFC-LC/MS/MS Revision No.: 0 Last Rev. Date: 08/24/16 Page: 3 of 3

Perfluorinated Compounds by Liquid Chromatography- Mass Spectrometry (LC/MS) (Based on TestAmerica Sacramento Standard Operating Procedure and EPA 537)

QC Element	Acceptance Criteria	Source of Criteria	Action for Non-Conformance	Reason Code	Discussion and Comments
Compound Identification	and Quantitation and Calculation				
Retention times	Retention times RRT within ±60 seconds of standard RRT in the most recent CCV		U (pos) if identification criteria not met	25	
Calibration Range	Results less than highest calibration standard	EcoChem standard policy	J results > high standard	20	
Dilutions, Re-extractions and/or Reanalyses	Report only one result per analyte	EcoChem standard policy	Use "DNR" to flag results that will not be reported.	11	TM-04 EcoChem Policy for Rejection/Selection Process for Multiple Results

¹ TA SOP: Perfluorinated Compounds in Waters, Soils, Sediments and Tissues [Method 537 Modified], WS-LC-0025, rev 1.9, 05/27/2016

(pos): Positive Result

² QAPP Addendum 2, Uniform Federal Policy Quality Assurance Project Plan, Site Inspection at SVAD-067 and SVAD-084, Savanna Army Depot Activity, Savanna, Illinois (Leidos., August 2018)

(ND): Non-detects



APPENDIX B

QUALIFIED DATA SUMMARY TABLE

Qualified Data Summary Table Savanna Army Depot

							DV
					Lab	DV	Reason
Sample ID	Laboratory ID	Analyte	Result	Units	Flag	Qualifier	Code
MW-84PFAS-02 LD0501	280-115117-13	Perfluorohexanesulfonic acid (PFHxS)	420	ng/L	J1	DNR	20
MW-84PFAS-02 LD0501	280-115117-13	Perfluorobutanesulfonic acid (PFBS)	110	ng/L	D	DNR	11
MW-84PFAS-02 LD0501	280-115117-13	Perfluoroheptanoic acid (PFHpA)	22	ng/L	DΜ	DNR	11
MW-84PFAS-02 LD0501	280-115117-13	Perfluorononanoic acid (PFNA)	6.9	ng/L	U	DNR	11
MW-84PFAS-02 LD0501	280-115117-13	Perfluorooctanesulfonic acid (PFOS)	120	ng/L	D	DNR	11
MW-84PFAS-02 LD0501	280-115117-13	Perfluorooctanoic acid (PFOA)	13	ng/L	DΜ	DNR	11
MW-67PFAS-03 LD0501	280-115117-8	Perfluorohexanesulfonic acid (PFHxS)	430	ng/L	J1	DNR	20
MW-67PFAS-03 LD0501	280-115117-8	Perfluorooctanoic acid (PFOA)	450	ng/L	J1	DNR	20
MW-67PFAS-03 LD0501	280-115117-8	Perfluorobutanesulfonic acid (PFBS)	6.2	ng/L	JD	DNR	11
MW-67PFAS-03 LD0501	280-115117-8	Perfluoroheptanoic acid (PFHpA)	16	ng/L	DΜ	DNR	11
MW-67PFAS-03 LD0501	280-115117-8	Perfluorononanoic acid (PFNA)	6.7	ng/L	U	DNR	11
MW-67PFAS-03 LD0501	280-115117-8	Perfluorooctanesulfonic acid (PFOS)	100	ng/L	D	DNR	11
MW-84PFAS-03 LD0501	280-115117-9	Perfluorohexanesulfonic acid (PFHxS)	850	ng/L	J1	DNR	20
MW-84PFAS-03 LD0501	280-115117-9	Perfluorononanoic acid (PFNA)	1700	ng/L	J1	DNR	20
MW-84PFAS-03 LD0501	280-115117-9	Perfluorooctanesulfonic acid (PFOS)	560	ng/L	J1	DNR	20
MW-84PFAS-03 LD0501	280-115117-9	Perfluorobutanesulfonic acid (PFBS)	45	ng/L	D	DNR	11
MW-84PFAS-03 LD0501	280-115117-9	Perfluoroheptanoic acid (PFHpA)	14	ng/L	U	DNR	11
MW-84PFAS-03 LD0501	280-115117-9	Perfluorooctanoic acid (PFOA)	160	ng/L	D	DNR	11

APPENDIX E

DATA PRESENTATION TABLES

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Table E-1. Site 67 PFAS Data Presentation Savanna Army Depot Activity, Savanna, Illinois

Location IE Sample IE Sample Type Depth (ft. Parameter Sample Date	e Units	GW Screening Level [G]	Project Action Limit [P]	MW-67PFAS-01 LDOS01 WELL 0 10/02/2018	MW-67PFAS-02 LDOS01 WELL 0 10/02/2018	MW-67PFAS-02 LDOS01D WELL 0 10/02/2018	MW-67PFAS-03 LDOS01 WELL 0 10/02/2018
PFAs							
Perfluorobutanesulfonic acid	ng/L	N/A	400000	3.4	3.1	3.3	6.2 J
Perfluoroheptanoic acid	ng/L	N/A	N/A	1.9 U	19	19	16
Perfluorohexanesulfonic acid	ng/L	N/A	N/A	99	52	51	440
Perfluorononanoic acid	ng/L	N/A	N/A	1.4 J	0.69 J	1.2 J	1.7 J
Perfluorooctane sulfonate	ng/L	370	70	33	160 [P]	170 [P]	100 [P]
Perfluorooctanoic acid	ng/L	370	70	350 [P]	200 [P]	200 [P]	470 [PG]

Table E-2. Site 84 PFAS Data Presentation Savanna Army Depot Activity, Savanna, Illinois

	Location ID				MW-84PFAS-01	MW-84PFAS-02	MW-84PFAS-03
	Sample ID		GW		LDOS01	LDOS01	LDOS01
	Sample Type	Units	Screening	Project Action Limit [P]	WELL	WELL	WELL
	Depth (ft.)		Level [G]		0	0	0
Parameter	Sample Date				10/03/2018	10/03/2018	10/02/2018
PFAs							
Perfluorobutanesul	fonic acid	ng/L	N/A	400000	0.62 J	110	44
Perfluoroheptanoic	acid	ng/L	N/A	N/A	1.3 U	22	4.9
Perfluorohexanesu	lfonic acid	ng/L	N/A	N/A	1.3 U	390	1000 J
Perfluorononanoic	acid	ng/L	N/A	N/A	1.3 U	1.4 U	1900 J
Perfluorooctane su	Ilfonate	ng/L	370	70	2.7 U	120 [P]	530 J [PG]
Perfluorooctanoic a	acid	ng/L	370	70	1.3 U	13	160 [P]

Notes

J = Estimated concentration.

U = Chemical not detected above the laboratory detection limit.

The Project Action Limits are based on the USEPA LHA for groundwater drinking water advisory, as updated in 2016. When both PFOS and PFOA are detected in water, the combined concentrations of PFOS and PFOA should be compared to the 70-ng/L LHA.

The groundwater project action limit for PFBS (400,000 ng/L) is the resident risk-based screening level for tap water from the November 2017 USEPA RSL table (with HQ = 1).

The groundwater screening level of 370 ng/L was referenced in the Army Guidance for Addressing Releases of PFAS (Department of the Army 2018). This screening level does not apply to the combined concentrations of PFOS and PFOA.

Bold values denote detected concentrations.

[P] = Concentration exceeds the USEPA LHA.

[G] = Concentration exceeds the Groundwater Screening Level.

[PG] = Concentration exceeds both the USEPA LHA and the Groundwater Screening Level.

N/A = No PAL available.

Table E-3. PFAS Potable Water Data Presentation
Savanna Army Depot Activity, Savanna, Illinois

Location ID	Sample ID	Sample Date	Method	CAS#	Parameter	Result	Qualifier	Units
MW-67PFAS-03	LDOSFB01	9/5/2018	USEPA 537	375-95-1	Perfluorononanoic acid	1.5	U	ng/L
MW-67PFAS-03	LDOSFB01	9/5/2018	USEPA 537	1763-23-1	Perfluorooctane sulfonate	3	U	ng/L
MW-67PFAS-03	LDOSFB01	9/5/2018	USEPA 537	335-67-1	Perfluorooctanoic acid	1.5	U	ng/L
MW-67PFAS-03	LDOSFB01	9/5/2018	USEPA 537	375-73-5	Perfluorobutanesulfonic acid	1	U	ng/L
MW-67PFAS-03	LDOSFB01	9/5/2018	USEPA 537	375-85-9	Perfluoroheptanoic acid	1.5	U	ng/L
MW-67PFAS-03	LDOSFB01	9/5/2018	USEPA 537	355-46-4	Perfluorohexanesulfonic acid	1	U	ng/L

APPENDIX F

REGULATORY COMMENTS AND ARMY RESPONSES TO COMMENTS

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. Box 19276, Springfield, Illinois 62794-9276 · (217) 782-3397 JB PRITZKER, GOVERNOR JOHN J. KIM, DIRECTOR

January 7, 2020

Ms. Cathy Collins Savanna Army Depot Activity 18935 B St., Building 246 Savanna, IL 61074-9636

Refer to: 0158100002 – Carroll County Savanna Army Depot Activity Superfund/Technical Reports

Dear Ms. Collins,

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Draft Final Revision 1 Site Inspection Report for Per and Polyfluoroalkyl Substances at SVAD-067 Fire Training Area and SVAD-084 Scrap Wood Open Burn Area, Savanna Army Depot Activity, Savanna Illinois dated October 2019 and received October 24, 2019. Illinois EPA's specific comments are provided as follows:

1. Section 1.4, Regulatory Overview and Project Action Limits: Please be advised that Illinois is preparing a revision to its groundwater quality regulations, including an extensive update to groundwater quality standards for Class 1 and Class 2 groundwater. Among the likely proposed changes, will be new Class 1 groundwater quality standards for several PFOS/PFOA compounds, including:

Constituent	Proposed Class 1 Standard (mg/L)
Perfluorobutane Sulfonic Acid (PFBS)	0.14
Perfluorohexane Sulfonic Acid (PFHxS)	0.00014
Perfluorononanoic Acid (PFNA)	0.000021
Perfluorooctanoic Acid (PFOA)	0.000021
Perfluorooctane Sulfonic Acid (PFOS)	0.000014
Combined PFOA + PFOS	0.000021

When these standards are adopted by the Illinois Pollution Control Board, these standards will be promulgated, enforceable, and of general applicability to groundwaters of the State, and will be applicable or relevant and appropriate requirements (ARARs) for the sites. Until adopted, these propose standards are "to be considered" (TBC) for any actions.

4302 N. Main Street, Rockford, IL 61103 (815) 987-7760 595 S. State Street, Elgin, IL 60123 (847) 608-3131 2125 S. First Street, Champaign, IL 61820 (217) 278-5800 2009 Mall Street Collinsville, IL 62234 (618) 346-5120 9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000 412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022 2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200-100 W. Randolph Street, Suite 4-500, Chicago, IL 60601 SVDA/PFAS SI Review, Site 67 and 84 January 7, 2020 Page 2 of 3

- Section 3.2.1.3, MEC Avoidance: State what the results of the MEC clearance efforts were; presumably nothing was found.
- 3. Section 7, Summary and Conclusions: The conclusion of "no action" is not consistent with the decision rules in the Final Quality Assurance Project Plan (QAPP, August 2018, Worksheet 11a). The QAPP indicates that further sampling will occur if the project action limits (PALs) are exceeded. Both sites demonstrated detections above the PALs; further sampling should occur.
- 4. Section 7, Summary and Conclusions: The report states that no action is planned because the groundwater at these sites is not a source of drinking water and that no exposure is expected at either site due to the depth of groundwater. The average depth to groundwater at Site 67 is about 16 feet with groundwater levels as shallow as 4 feet. Groundwater could be encountered at this site during construction activities; thereby presenting a risk. Regardless, Illinois EPA advises the Army that action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) is required if there is a potential of current or future risk at a site. This could be the case at Site 67, and the CERCLA process should be followed to determine extent of contamination, degree of risk associated with such exposures, and need for remediation for this pathway. Additionally, the CERCLA/NCP requirement to define nature and extent of contamination needs to be met, and it appears this was the Army's original intent, based on the QAPP.

Moreover, Illinois has primacy over groundwater pursuant to USEPA's July 29, 1997 endorsement of its program developed to meet USEPA's Comprehensive State Groundwater Protection Program (CSGWPP). When Illinois' groundwater quality standards are exceeded, Illinois statute (415 ILCS 55 and 415 ILCS 5) and rule (35 III. Adm. Code Part 620) require corrective action until the exceedance(s) are abated. Protection of future beneficial uses of groundwater is a priority of Illinois' groundwater program. Active corrective action is to be undertaken for impacted Illinois groundwaters whether or not they are being actively used.

Additionally, the State's non-degradation provision of its groundwater regulations (35 III. Adm. Code 620.301) prohibits the release of any contaminant that may compromise a potential use of such groundwater. Since the groundwater at the installation is Class I, ongoing contamination at Site 67 and 84 needs to be addressed.

The State's non-degradation provisions do not preclude the establishment of a groundwater management zone (GMZ) to manage such releases, but the requirements for establishing a GMZ would need to be met, including determining the vertical and horizontal extent of any plumes.

SVDA/PFAS SI Review, Site 67 and 84 January 7, 2020 Page 3 of 3

5. Until the above comments are resolved, Illinois EPA does not concur with the Army's conclusion for no further action for either site.

If you have any questions or wish to discuss this further, please contact me at <u>Charlene.falco@illinois.gov</u> or at 217-785-2891.

Sincerely,

Charlene Falco Project Manager Federal Site Remediation Section Bureau of Land

CAF.eMP.eAH:p:\\SVDA\RI\PFAS Investigations\ Site 67 and 84 PFAS SI Review_01 2020.docx

cc: Thomas Barounis, EPA Region 5 Dick Kennard, USACE Marcy Larriva, Leidos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

January 14, 2020

REPLY TO THE STRENTION OF

Ms. Cathy Collins BRAC Environmental Coordinator Building 246 18935 B Street Savanna Army Depot Savanna, IL 61074

Subject: U.S. EPA Review of the Site Inspection Report for Per- and Polyalkyl Substances at SVAD-067 – Fire Training Area and SVAD-084 – Scrap Wood Open Burn Area, Draft Final, Revision 1, Savanna Army Depot Activity, Savanna, Illinois, October 2019

Dear Ms. Collins:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject *Site Inspection Report for Per- and Polyalkyl Substances at SVAD-067 – Fire Training Area and SVAD-084 – Scrap Wood Open Burn Area, Draft Final, Revision 1* (SI Report). Enclosed please find our comments. EPA's comments represent review by EPA Region 5 staff and EPA's Federal Facilities Restoration and Reuse Office.

If you have any questions, or require additional information, please feel free to contact me by phone at (312) 353-5577 or by e-mail (barounis.thomas@epa.gov).

Sincerely,

Jon Barouns

Tom Barounis Remedial Project Manager

cc: Todd Knuth, USACE Charlene Falco, IEPA Dick Kennard, USACE Marcy Larriva, Leidos Caroline Baier-Anderson, FFRRO

U.S. EPA Review of the Site Inspection Report for Per- and Polyalkyl Substances at SVAD-067 – Fire Training Area and SVAD-084 – Scrap Wood Open Burn Area, Draft Final, Revision 1, Savanna Army Depot Activity, Savanna, Illinois, October 2019

January 14, 2020

EPA Region 5 Comments

GENERAL COMMENTS

- According to Section 7 (Summary and Conclusions), no additional action for PFAS in groundwater at SVAD-067 and SVAD-084 is required at this time because the "the six UCMR3 [Third Unregulated Contaminant Monitoring Rule] PFAS compounds were analyzed for and not detected" at the SVDA Lower Post drinking water on September 26, 2016 and "does not pose an imminent and substantial endangerment." However, it is unknown if land use controls (LUCs) are in place to prevent future exposure to the PFAS contamination. Clarify whether appropriate LUCs are in place to prevent future exposure to PFAS in groundwater at SVAD-067 and SVAD-084.
- 2. According to Section 7 (Summary and Conclusions), analysis of the SVDA Lower Post drinking water was conducted in September 26, 2016 using an outdated analytical method. As such, it is unclear if the SVDA Lower Post drinking water has been re-sampled using EPA Method 537.1 to substantiate that an imminent and substantial endangerment does not exist. Further, it is unclear if outfalls and/or seeps along the Mississippi River were evaluated to determine if PFAS contamination at SVDA is contributing to potential drinking water sources/ambient waters. Per the EPA's Per- and Polyfluoroalkyl Substances (PFAS) Action Plan, EPA 823R18004, dated February 2019 (the EPA PFAS Action Plan), one of the long-term actions identified as a stakeholder concern is the reduction of PFAS releases into ambient waters and sources of drinking water. Clarify if the SVDA Lower Post drinking water has been re-sampled using EPA Method 537.1 to substantiate that an imminent and substantial endangerment does not exist. In addition, revise the SI to clarify if outfalls and/or seeps along the Mississippi River were evaluated to determine that PFAS contamination at SVDA is not contributing to potential drinking water sources/ambient waters.
- 3. The SI does not discuss or evaluate the potential for contribution of PFAS contamination from upgradient sources at SVAD-067. Although the objective of the SI was to determine the presence or absence of PFAS in groundwater at SVAD-067 and SVAD-084, Section 5.2 (SI Sampling and Results) concludes that PFAS contamination upgradient of SVAD-067 is due to reversing groundwater flow conditions. However, upgradient sources of PFAS contamination at SVAD-067, SVAD-084, and adjacent upgradient sites are not provided in the SI. As a result, it is unknown if such potential upgradient PFAS sources exist. Revise the SI to provide information to substantiate the claim that upgradient PFAS contamination at SVAD-067 is due to reversing groundwater flow conditions and not to other potential upgradient PFAS sources.

- 4. The discussion of analytical data and data quality in both Section 4 (Laboratory Chemical Analysis Program and Quality Assurance Summary) and Appendix D (Data Quality Assessment) of the SI Report is insufficiently detailed. Examples of insufficient information include, but are not limited to:
 - a) Section 4.6.5 (Completeness) states that "Completeness measures the amount of valid data obtained from the laboratory analysis process and sampling" and Section 4.6.7 (Data Usability Assessment) indicates that 100 percent (%) of the data are complete and usable. However, the Addendum 2 Uniform Federal Policy Quality Assurance Project Plan, Site Inspection at SVAD-067 and SVAD-084, Savanna Army Depot Activity, dated August 2018 (the Addendum 2 QAPP) indicates that completeness is calculated based on the number of data points that are not rejected compared to the total number of data points planned. The SI report should clarify how completeness was calculated.
 - b) Section 4 and Appendix D indicate that some data were qualified based on quality control (QC) exceedances; however, the SI Report does not provide the QC sample results along with the QC acceptance criteria in order to show the extent of the exceedances.
 - c) It is unclear if the split sample analyzed by Eurofins-Lancaster was validated by Leidos and/or EcoChem. The SI Report should specify which sample data was validated by Leidos and which sample data was validated by EcoChem. If the split sample data was not validated, the SI Report should discuss why the split sample data was not validated.
 - d) The SI Report does not include the laboratory analytical data packages, and therefore, statements about data usability cannot be verified.
 - e) Appendix D includes the EcoChem Data Validation Report as Attachment A; however, it is unclear why data validation reports from Leidos have not been provided.

Revise the SI Report to provide a clear and complete discussion of the analytical data and data quality.

- 5. Section 4 (Laboratory Chemical Analysis Program and Quality Assurance Summary) and Appendix D (Data Quality Assessment) of the SI Report both indicate that the October 1999 version of the National Functional Guidelines for Organic Data Review (NFGs) was used to validate the data; however, NFGs have been updated several times since 1999, and it is unclear why a more recent version was not used for data validation. Ensure the appropriate version of the NFGs was used to validate the data and revise the SI Report to discuss why a more recent version was not used.
- 6. Results are inconsistently presented throughout the SI Report. For example, Appendix E (Data Presentation Tables), Table E-2 (Site 84 PFAS Data Presentation) lists the Perfluorononanoic acid (PFNA) concentration in sample MW-84PFAS-03 LDOS01 as 1,900 nanograms per liter (ng/L), but Qualified Data Summary Table in Appendix B of the EcoChem Data Validation Report (Attachment A of Appendix D) lists the PFNA result as

1,700 ng/L. As a second example, Table E-1 (Site 67 PFAS Data Presentation) lists the Perfluorohexanesulfonic acid (PFHxS) concentration in sample MW-67PFAS-03 LDOS01 as 440 ng/L, but the Qualified Data Summary Table in Appendix B of the EcoChem Data Validation Report lists the PFHxS result as 430 ng/L. As a third example, Table D-5 (Third Party Data Validation) in Appendix D (Data Quality Assessment) lists two different results for the compounds in sample MW-84PFAS-03 LDOS01, which are not always the same as the results listed in the Qualified Data Summary Table in Appendix B of the EcoChem Data Validation Report or Appendix E (e.g., Table D-5 has PFHxS results in sample MW-84PFAS-03 LDOS01 as 850 ng/L and 1,000 ng/L, but the EcoChem Data Validation Report lists the PFHxS result as 850 ng/L, and Table E-2 lists the PFHxS result as 1,000 ng/L). Revise the SI Report to ensure that the correct results are presented for all samples collected.

SPECIFIC COMMENTS

- 1. Section 1, Introduction, Page 1-1: The text indicates that aqueous film-forming foam (AFFF) contained various PFAS, and the objective of the SI was to determine the presence or absence of perfluorooctane sulfonate (PFOS) or perfluorooctanoic acid (PFOA) in groundwater at SVAD-067 and SVAD-084. However, the Army PFAS Guidance does not limit PFAS SI sample analytical to only PFOA and PFOS. Revise the SI to discuss why the presence or absence of comprehensive PFAS were not an objective of this SI.
- 2. Section 1, Introduction, Page 1-4: The text describes the rationale for investigation of PFAS in groundwater at SVAD-067 and SVAD-084 but does not clarify that PFAS-based AFFF was invented in 1966 or that the use of military standard (MILSPEC) AFFF containing PFAS started in December 1969. As a result, although the sites were used for fire training activities, AFFF containing PFASs were unlikely to have been used on the sites until after 1966. Revise Section 1 to clarify that AFFF containing PFAS were unlikely to have been used on the sites until after 1966.
- 3. Section 1.3, Fire Training Activities at SVAD-067 and SVAD-084, Page 1-5: Section 1.3 does not discuss how AFFF was dispensed. For example, it is unclear if AFFF was dispensed from trucks using hoses and nozzles. If trucks, hoses, and nozzles were used, it is unclear where the equipment was washed and dried. This is of note given that AFFF would drip off the equipment on wash and drying racks. Further, if trucks were used, it is unclear where they were filled, where the AFFF was stored prior to filling, etc, and whether accidental spills and releases during transport occurred. Revise the SI to discuss all aspects of AFFF use and storage at SVAD-064 and SVAD-087.
- 4. Section 1.4, Regulatory Overview and Project Action Limits, Page 1-6: The SI text states, "Currently, no legally enforceable Federal standards, such as maximum contaminant levels (MCLs), exist for PFAS in water. However, under SDWA, USEPA issued a series of Health Advisories (HAs) for PFOS and PFOA, including the most recent in May 2016." The EPA PFAS Action Plan also outlines these HAs and includes additional information regarding future PFAS regulation. Revise Section 1.4 to discuss the EPA PFAS Action Plan.

- 5. Section 2.5, Surface Water Hydrology, Page 2-4: The text states, "No surface water features are located on SVAD-067 or SVAD-084." However, Section 5.1 (Site History) states that one of the site features at SVAD-067 included an outfall area used to drain water associated with the waste oil tank, metal trays to support fire training exercises, and aboveground storage tanks. As a result, it is unclear why this outfall area was not investigated as part of the SI. Revise the SI to identify and discuss all potential low-lying areas where PFAS potentially migrated to and demonstrate that these areas were adequately characterized during the SI activities.
- 6. Section 2.6.1, Geology/Hydrogeology at SVAD-067, Page 2-5; Figure 2-2, Lower Post Area Groundwater Elevation Normal Flow Conditions July 1999, Page 2-6; Figure 2-3, Lower Post Area Groundwater Elevation Reversed Flow Conditions June 2000, Page 2-7; and, Section 2.6.2, Geology/Hydrogeology at SVAD-084, Page 2-8: The groundwater flow maps referenced in Sections 2.6.1 and 2.6.2 may not be representative of current groundwater flow conditions. Figures 2-2 and 2-3 indicate that July 1999 and June 2000 groundwater elevation data were used to determine groundwater flow directions, respectively. However, Worksheet #13a (Secondary Data Uses and Limitations) of the Final Addendum 2 Uniform Federal Policy Quality Assurance Project Plan, Site Inspection at SVAD-067 and SVAD-084, dated August 2018 (the Final UFP-QAPP) indicates that information in the Final Remedial Investigation Report for the Lower Post, dated October 2004 (the 2004 Lower Post RI Report) and the Remedial Investigation Report for Sites 46, 76CS, 84, and 184, dated December 2007 (the 2007 RI Report) were to be used to determine geology, hydrogeology, and groundwater flow directions. Revise the SI to address this discrepancy.
- 7. Section 3.1, Field Investigation Activities, Page 3-1; Figure 5-1, SVAD-067 Fire Training Area, Page 5-2; and, Figure 6-1, SVAD-084 Scrap Wood Open Burn Area, Page 6-2: The location description of the groundwater monitoring wells installed, and groundwater samples collected is inconsistent with the Figure depiction. The text in this section states that the groundwater samples were collected at and downgradient from SVAD-067 and SVAD-084. However, Figures 5-1 and 6-1 show the groundwater monitoring well locations as being within each site. Revise the SI to state that the groundwater samples were collected within SVAD-067 and SVAD-084.
- 8. Section 3.2.1.1, Visual Inspections, Page 3-2: Section 3.2.1.1 states, "A visual inspection was conducted at the SVAD-067 and SVAD-084 areas prior to initiating drilling activities for monitoring well installation." However, documentation of the visual inspections is not provided and/or referenced in the SI. Revise the SI to include an appendix of the visual inspection documentation (notes, photographs, identified surface water drainage patterns, etc.).
- **9.** Section 3.2.1.4, Groundwater Monitoring Well Installation, Page 3-3: The text states, "The potable water used for hydration and decontamination activities was sampled during the event." However, analytical results for the potable water are not included in the SI. Revise the SI to include the results of the potable water sample.

- 10. Section 3.5, Disposition of Field Investigation-Derived Waste, Page 3-7: The text states, "Veolia advised Leidos to analyze for suspected contaminants based on site history and previous investigations." However, the SI does not indicate whether the investigationderived waste (IDW) was analyzed for PFAS. Revise the SI to include PFAS results for IDW samples, if available. If PFAS was not analyzed, discuss how proper IDW disposal was achieved without such analyses.
- 11. Section 4.1.2, Laboratory Sample Receipt, Page 4-1: This section states that "All insufficiencies and/or discrepancies were reported immediately to the Laboratory Project Manager, who notified Leidos within 24 hours to determine if resampling was required." However, it is unclear what those insufficiencies and/or discrepancies were and if resampling was required. Revise Section 4.1.2 to discuss all sample receipt insufficiencies and/or discrepancies and/or discrepancies and/or discrepancies and/or discrepancies.
- 12. Section 4.5.4, Third-Party Data Validation, Page 4-4: The first sentence in the second paragraph states that Table D-4 in Appendix D (Data Quality Assessment) provides a comparison of data qualifiers applied by Leidos and the third-part validator; however, this information is provided in Appendix D, Table D-5. Revise Section 4.5.4 to reference the correct table in Appendix D.
- 13. Section 4.6.1, Precision, Page 4-5 and Appendix D, Section D.3, Field Quality Control Assessment, Page D-4: Sections 4.6.1 and D.3 indicate that the acceptance limit for field duplicate samples is a maximum relative percent difference (RPD) of 50%; however, the Addendum 2 QAPP indicates that the field duplicate acceptance criteria for aqueous samples is RPD < 30%. Revise the SI Report to reflect the correct acceptance limit for field duplicate samples and discuss any field duplicate exceedances based on the corrected acceptance limit.</p>
- 14. Figure 5-1, SVAD-067 Fire Training Area, Page 5-2; Figure 5-2, SVAD-067 Fire Training Area Analytical Results, Page 5-4; Figure 6-1, SVAD-084 Scrap Wood Open Burn Area, Page 6-2; and, Figure 6-2, SVAD-084, Scrap Wood Open Burn Area Analytical Results, Page 6-3: The SI site-specific figures for each of the sites assessed do not display the location of all relevant current and historical site features discussed in Sections 5.1 (Site History) and 6.1 (Site History) (e.g., outfall areas, storage tanks, etc.). Revise the site-specific figures to include relevant site features for sites SVAD-067 and SVAD-084.
- 15. Section 6.1, Site History, Page 6-1; Figure 6-1, SVAD-084 Scrap Wood Open Burn Area, Page 6-2; and, Figure 6-2, SVAD-084, Scrap Wood Open Burn Area Analytical Results, Page 6-3: Based on Figures 6-1 and 6-2, MW-84PFAS-02 was advanced in the "IRA Actual Remediation Area"; however, it is unclear how advancement of a monitoring well within a previously excavated area is appropriate to investigate site conditions and a source area. This is of note given that Section 6.1 indicates that "approximately 3,232 tons of nonhazardous soil and debris were excavated and disposed of offsite." As such, the analytical results from MW-84PFAS-02 may be under-representing the site conditions and the source area. Revise the SI to clarify how advancement of a monitoring well within a previously excavated area is appropriate to investigate site conditions and a source area.

- 16. Appendix A, SVDA Drinking Water PFAS Data: According to Appendix A (PDF Page 61 of 120), the field blank sample collected on September 26, 2016 (NLS 1D: 948929) was not analyzed for PFAS; however, the SI does not discuss why the field blank sample was not analyzed for PFAS. Revise the SI to clarify why the field blank sample collected on September 26, 2016 (NLS ID: 948929) was not analyzed for PFAS.
- 17. Appendix D, Data Quality Assessment, Section D.4.2, Data Verification/Data Validation Comparison, Page D-5: The first and last sentences in the first paragraph of this section state that Table D-4 provides a comparison of data qualifiers applied by Leidos and the third-part validator; however, this information is provided in Table D-5. Revise Section D.4.2 to reference the correct table.
- 18. Appendix D, Data Quality Assessment, Tables D-1 through D-5, Pages D-7 to D-9: Tables D-1 through D-5 in Appendix D are incomplete. The tables do not clarify if the information provided in each table is for the primary sample or the split sample. In addition, Section D-2 of Appendix D states that "All data validation qualifiers applied to the data are presented in Table D-2." However, Tables D-3, D-4 and D-5 include qualified data that is not listed in Table D-2; and further, Table D-5 includes qualifier letter and number codes that are not defined in the table or discussed in the Appendix D text. For example, "DNR" is listed as a validation qualifier in Table D-5, but the "Overall Assessment" section in Attachment A (EcoChem Data Validation Report) of Appendix D states, "Data flagged DNR should not be used. All other data, as reported, are acceptable for use." Finally, the column headings in Table D-5 need clarification. The difference between "Parent Qualifier," "Validation Qualifier," and "Duplicate Qualifier" is unclear, and the table does not specify if the qualifiers listed were applied by Leidos or EcoChem. Revise Tables D-1 through D-5 to provide complete information.
- 19. Appendix E, Data Presentation Tables, Page E-1: Tables E-1 (Site 67 PFAS Data Presentation) and E-2 (Site 84 PFAS Data Presentation) present results that are shaded pink with a [P] code and results that are shaded orange with a [PG] code, but these colors and codes are not defined. Revise Appendix E to define the pink and orange shading and [P] and [PG] codes, and ensure their significance is discussed in the SI Report.

Comments from EPA Federal Facilities Restoration and Reuse Office

- 1. The scope of the SI should be expanded to consider other potential sources of PFAS in the environment (including PFAS beyond PFOA and PFOS) or a rationale should be provided as to why the scope was limited to AFFF areas and these two PFAS.
- 2. A Conceptual Site Model (CSM) would help to provide context for the interpretation of the results from the sampling. EPA recommends that a CSM be included in with this report.
- 3. Please add a discussion of any drinking water wells that may be located near the base boundary. Please include justification for not sampling these wells. Also, please discuss how

seasonal groundwater flow reversal impacts PFAS groundwater contamination. Describe how groundwater sampling is designed to account for these changes.

- 4. According to this report, there are no surface water features located on the study locations and groundwater is likely entering the Mississippi River. Releases of contaminated groundwater to the Mississippi River should be further investigated, given the importance of the River as a drinking water source.
- 5. Please clearly state in Section 4.2 if Method 537 was modified to measure PFAS in groundwater.
- 6. The Assistant Secretary of Defense recently issued guidance directing PFAS investigators to use a screening level of 40 parts per trillion for PFOA and PFOS (*ASD Memorandum for Assistant Secretaries of the Army, Navy, Air Force, National Guard Bureau and Defense Logistics Agency, October 15, 2019*). U.S. EPA also recently issued guidance recommending a screening level of 40ng/L for PFOA and PFOS (*"Interim Recommendations to Address Groundwater Contaminated with Perfluorooctanoic Acid and Perfluorooctanesulfonate, OLEM Directive No. 9283.1-47, December 19, 2019"*). The PFOA and PFOS results from the monitoring wells should be re-screened using the updated screening level.
- 7. Please describe LUCS that may be in place to prevent use of base groundwater. Also, please provide language that describes how/where in the base master plan PFAS contamination information will be tracked and stored.

USEPA Review of the Site Inspection Report for Per- and Polyalkyl Substances at SVAD-067 – Fire Training Area and SVAD-084 – Scrap Wood Open Burn Area, Draft Final, Revision 1, Savanna Army Depot Activity, Savanna, Illinois, October 2019

Comments: January 15, 2020 Responses: January 25, 2021

USEPA Region 5 Comments

GENERAL COMMENTS

1. According to Section 7 (Summary and Conclusions), no additional action for PFAS in groundwater at SVAD-067 and SVAD-084 is required at this time because the "the six UCMR3 [Third Unregulated Contaminant Monitoring Rule] PFAS compounds were analyzed for and not detected" at the SVDA Lower Post drinking water on September 26, 2016 and "does not pose an imminent and substantial endangerment." However, it is unknown if land use controls (LUCs) are in place to prevent future exposure to the PFAS contamination. Clarify whether appropriate LUCs are in place to prevent future exposure to PFAS in groundwater at SVAD-067 and SVAD-084.

Response: LUCs are not currently in place to prevent future exposure to PFAS in groundwater at SVAD-067 or SVAD-084.

2. According to Section 7 (Summary and Conclusions), analysis of the SVDA Lower Post drinking water was conducted in September 26, 2016 using an outdated analytical method. As such, it is unclear if the SVDA Lower Post drinking water has been re-sampled using EPA Method 537.1 to substantiate that an imminent and substantial endangerment does not exist. Further, it is unclear if outfalls and/or seeps along the Mississippi River were evaluated to determine if PFAS contamination at SVDA is contributing to potential drinking water sources/ambient waters. Per the EPA's Per- and Polyfluoroalkyl Substances (PFAS) Action Plan, EPA 823R18004, dated February 2019 (the EPA PFAS Action Plan), one of the long-term actions identified as a stakeholder concern is the reduction of PFAS releases into ambient waters and sources of drinking water. Clarify if the SVDA Lower Post drinking water has been re-sampled using EPA Method 537.1 to substantiate that an imminent and substantial endangerment does not exist. In addition, revise the SI to clarify if outfalls and/or seeps along the Mississippi River were evaluated to determine that PFAS contamination at SVDA is not contributing to potential drinking water sources/ambient waters.

Response: The SVDA drinking water was sampled in 2016 using the appropriate method for sampling PFAS at the time. The intent of the SI sampling was to determine the presence/absence of PFAS constituents at SVAD-067 and SVAD-084. Samples from outfalls and/or seeps along the Mississippi River were not required to meet project DQOs.

3. The SI does not discuss or evaluate the potential for contribution of PFAS contamination from upgradient sources at SVAD-067. Although the objective of the SI was to determine the presence or absence of PFAS in groundwater at SVAD-067 and SVAD-084, Section 5.2 (SI Sampling and Results) concludes that PFAS contamination upgradient of SVAD-067 is due to reversing groundwater flow conditions. However, upgradient sources of PFAS contamination at SVAD-067, SVAD-084, and adjacent upgradient sites are not provided in the SI. As a result, it is unknown if such potential upgradient PFAS contamination at SVAD-067 is due to reversing groundwater flow conditions and not to other potential upgradient PFAS sources.

Response: Based on the historical records review conducted as part of the SVDA Environmental Baseline Survey and interviews with former SVDA employees conducted as part of the PFAS SI activities, no suspected PFAS sources are upgradient of or adjacent to SVAD-067 and SVAD-084. The

historical records review and interviews did not reveal how the AFFF was stored or dispensed at SVDA.

- 4. The discussion of analytical data and data quality in both Section 4 (Laboratory Chemical Analysis Program and Quality Assurance Summary) and Appendix D (Data Quality Assessment) of the SI Report is insufficiently detailed. Examples of insufficient information include, but are not limited to:
 - a) Section 4.6.5 (Completeness) states that "Completeness measures the amount of valid data obtained from the laboratory analysis process and sampling" and Section 4.6.7 (Data Usability Assessment) indicates that 100 percent (%) of the data are complete and usable. However, the Addendum 2 Uniform Federal Policy Quality Assurance Project Plan, Site Inspection at SVAD-067 and SVAD-084, Savanna Army Depot Activity, dated August 2018 (the Addendum 2 QAPP) indicates that completeness is calculated based on the number of data points that are not rejected compared to the total number of data points planned. The SI report should clarify how completeness was calculated.

Response: Section 4.6.7 was revised as follows:

"No data points were rejected during the data validation process. As a result, data completeness was excellent at 100 percent complete. Seventy-eight of the planned 78 data points are considered fully usable for decision making. Three results were qualified as nondetect (U) due to continuing calibration blank contamination, and three results were qualified as estimated (J) due to IS area counts that were slightly above (7 percent) the UCL."

b) Section 4 and Appendix D indicate that some data were qualified based on quality control (QC) exceedances; however, the SI Report does not provide the QC sample results along with the QC acceptance criteria in order to show the extent of the exceedances.

Response: The only QC exceedances found in the PFAS data are provided in the response above and are now included in Section 4.6.7. No changes were made to the documents.

c) It is unclear if the split sample analyzed by Eurofins-Lancaster was validated by Leidos and/or EcoChem. The SI Report should specify which sample data was validated by Leidos and which sample data was validated by EcoChem. If the split sample data was not validated, the SI Report should discuss why the split sample data was not validated.

Response: The QA split sample is generally analyzed by a USACE-selected QA laboratory with results reported directly to USACE. For this project, Leidos was assisting USACE with the contracting of the QA laboratory. The data generated from this QA sample were not included in the SI data evaluations, and the results for the sample will not be used in decision making; therefore, the results did not require data validation. However, it should be noted that the split results were in excellent agreement, as shown in Table D-4. No changes to the documents were made.

d) The SI Report does not include the laboratory analytical data packages, and therefore, statements about data usability cannot be verified.

Response: Section 4 and Appendix D of the SI Report provide an accurate summary of all QA measures reviewed to determine data usability. In instances where QC criteria were not met, these deficiencies were noted in detail and any impact on data usability was discussed. The laboratory analytical data packages total more than 4,800 pages and it is not practical to include them in the SI Report. No changes to the documents were made.

e) Appendix D includes the EcoChem Data Validation Report as Attachment A; however, it is unclear why data validation reports from Leidos have not been provided.

Response: Appendix D includes the EcoChem Data Validation Report, which is a summary of their validation. Appendix D is a summary of Leidos' validation. No changes to the documents were made.

Revise the SI Report to provide a clear and complete discussion of the analytical data and data quality.

Response: Appendix D includes the EcoChem Data Validation Report, which is a summary of their validation. Appendix D is a summary of Leidos' validation and provides a clear and complete discussion of the analytical data and data quality.

5. Section 4 (Laboratory Chemical Analysis Program and Quality Assurance Summary) and Appendix D (Data Quality Assessment) of the SI Report both indicate that the October 1999 version of the National Functional Guidelines for Organic Data Review (NFGs) was used to validate the data; however, NFGs have been updated several times since 1999, and it is unclear why a more recent version was not used for data validation. Ensure the appropriate version of the NFGs was used to validate the data and revise the SI Report to discuss why a more recent version was not used.

Response: National Functional Guidelines are written for USEPA Contract Laboratory Program (CLP) analysis, and the 1999 version is more applicable to most USEPA and SW-846 methods than the more recent updates. It is common for data validation to reference the 1999 version when validating non-CLP data.

6. Results are inconsistently presented throughout the SI Report. For example, Appendix E (Data Presentation Tables), Table E-2 (Site 84 PFAS Data Presentation) lists the Perfluorononanoic acid (PFNA) concentration in sample MW-84PFAS-03 LDOS01 as 1,900 nanograms per liter (ng/L), but Qualified Data Summary Table in Appendix B of the EcoChem Data Validation Report (Attachment A of Appendix D) lists the PFNA result as 1,700 ng/L. As a second example, Table E-1 (Site 67 PFAS Data Presentation) lists the Perfluorohexanesulfonic acid (PFHxS) concentration in sample MW-67PFAS-03 LDOS01 as 440 ng/L, but the Qualified Data Summary Table in Appendix B of the EcoChem Data Validation Report lists the PFHxS result as 430 ng/L. As a third example, Table D-5 (Third Party Data Validation) in Appendix D (Data Quality Assessment) lists two different results for the compounds in sample MW-84PFAS-03 LDOS01, which are not always the same as the results listed in the Qualified Data Summary Table in Appendix B of the EcoChem Data Validation Report or Appendix E (e.g., Table D-5 has PFHxS results in sample MW-84PFAS-03 LDOS01 as 850 ng/L and 1,000 ng/L, but the EcoChem Data Validation Report lists the PFHxS result as 850 ng/L, and Table E-2 lists the PFHxS result as 1,000 ng/L). Revise the SI Report to ensure that the correct results are presented for all samples collected.

Response: See response to USEPA Specific Comment #18 for clarification and document revisions regarding this comment. The above examples are values provided in the EcoChem Data Validation Report. In some instances, Leidos used professional judgment and chose the higher result when two equally valid results from different dilutions were available. When no difference in data quality exists, the more conservative approach is to use the higher result for decision making.

SPECIFIC COMMENTS

1. Section 1, Introduction, Page 1-1: The text indicates that aqueous film-forming foam (AFFF) contained various PFAS, and the objective of the SI was to determine the presence or absence of perfluorooctane sulfonate (PFOS) or perfluorooctanoic acid (PFOA) in groundwater at SVAD-067 and SVAD-084. However, the Army PFAS Guidance does not limit PFAS SI sample analytical to only PFOA and PFOS. Revise the SI to discuss why the presence or absence of comprehensive PFAS were not an objective of this SI.

Response: Prior to conducting the PA/SI, stakeholder discussions concluded that the PA/SI would focus on determining the presence/absence of PFOS and PFOA given that the USEPA health advisory levels

were for these two constituents and that neither USEPA nor IEPA had established screening criteria for any of the other PFAS constituents at the time. SVAD-067 and SVAD-084 samples were analyzed for the six PFAS listed in the SDWA UCMR3. The SI Report was revised to present the results of these analytes.

2. Section 1, Introduction, Page 1-4: The text describes the rationale for investigation of PFAS in groundwater at SVAD-067 and SVAD-084 but does not clarify that PFAS-based AFFF was invented in 1966 or that the use of military standard (MILSPEC) AFFF containing PFAS started in December 1969. As a result, although the sites were used for fire training activities, AFFF containing PFASs were unlikely to have been used on the sites until after 1966. Revise Section 1 to clarify that AFFF containing PFAS were unlikely to have been used on the sites until after 1966.

Response: Section 1 was amended with the following text: "Based on the timeline for development of AFFF, AFFF-containing PFAS was unlikely to have been used until after 1966."

3. Section 1.3, Fire Training Activities at SVAD-067 and SVAD-084, Page 1-5: Section 1.3 does not discuss how AFFF was dispensed. For example, it is unclear if AFFF was dispensed from trucks using hoses and nozzles. If trucks, hoses, and nozzles were used, it is unclear where the equipment was washed and dried. This is of note given that AFFF would drip off the equipment on wash and drying racks. Further, if trucks were used, it is unclear where they were filled, where the AFFF was stored prior to filling, etc, and whether accidental spills and releases during transport occurred. Revise the SI to discuss all aspects of AFFF use and storage at SVAD-064 and SVAD-087.

Response: The historical records review conducted as part of the SVDA Environmental Baseline Survey and interviews with former SVDA employees conducted as part of the PFAS SI activities did not reveal how the AFFF was stored or dispensed.

4. Section 1.4, Regulatory Overview and Project Action Limits, Page 1-6: The SI text states, "Currently, no legally enforceable Federal standards, such as maximum contaminant levels (MCLs), exist for PFAS in water. However, under SDWA, USEPA issued a series of Health Advisories (HAs) for PFOS and PFOA, including the most recent in May 2016." The EPA PFAS Action Plan also outlines these HAs and includes additional information regarding future PFAS regulation. Revise Section 1.4 to discuss the EPA PFAS Action Plan.

Response: Section 1.4 was amended with the following text:

"USEPA issued the PFAS Action Plan in February 2019. The PFAS Action Plan is the first multimedia, multi-program, national research, management, and risk communication plan to address PFAS and outlines the tools USEPA is developing to address PFAS in drinking water, identify and clean up PFAS contamination, expand monitoring of PFAS manufacturing, increase PFAS scientific research, and promote effective enforcement tools."

5. Section 2.5, Surface Water Hydrology, Page 2-4: The text states, "No surface water features are located on SVAD-067 or SVAD-084." However, Section 5.1 (Site History) states that one of the site features at SVAD-067 included an outfall area used to drain water associated with the waste oil tank, metal trays to support fire training exercises, and aboveground storage tanks. As a result, it is unclear why this outfall area was not investigated as part of the SI. Revise the SI to identify and discuss all potential low-lying areas where PFAS potentially migrated to and demonstrate that these areas were adequately characterized during the SI activities.

Response: Section 5.1 text was clarified to indicate that the drain water from the waste oil tank was not discharged to a surface water body, but to the ground surface. The sentence was modified as shown below:

"Other site features included the outfall area used to where drain-water associated with the waste oil tank was discharged to the ground surface, aboveground metal trays..."

Monitoring well MW-67PFAS-03 was placed in the vicinity of the discharge point and downgradient from the waste oil tank, metal trays to support fire training exercises, and the aboveground storage tanks.

6. Section 2.6.1, Geology/Hydrogeology at SVAD-067, Page 2-5; Figure 2-2, Lower Post Area Groundwater Elevation Normal Flow Conditions – July 1999, Page 2-6; Figure 2-3, Lower Post Area Groundwater Elevation Reversed Flow Conditions – June 2000, Page 2-7; and, Section 2.6.2, Geology/Hydrogeology at SVAD-084, Page 2-8: The groundwater flow maps referenced in Sections 2.6.1 and 2.6.2 may not be representative of current groundwater flow conditions. Figures 2-2 and 2-3 indicate that July 1999 and June 2000 groundwater elevation data were used to determine groundwater flow directions, respectively. However, Worksheet #13a (Secondary Data Uses and Limitations) of the Final Addendum 2 Uniform Federal Policy Quality Assurance Project Plan, Site Inspection at SVAD-067 and SVAD-084, dated August 2018 (the Final UFP-QAPP) indicates that information in the Final Remedial Investigation Report for the Lower Post, dated October 2004 (the 2004 Lower Post RI Report) and the Remedial Investigation Report for Sites 46, 76CS, 84, and 184, dated December 2007 (the 2007 RI Report) were to be used to determine geology, hydrogeology, and groundwater flow directions. Revise the SI to address this discrepancy.

Response: Information from the final Remedial Investigation Report for the Lower Post and the Remedial Investigation Report for Sites 46, 76CS, 84, and 184 were used in the site-specific geology/hydrogeology sections of the SI. However, in addition to the RI data, the extensive Installation-wide continuous groundwater monitoring data that were collected over a 27-month period as well as the groundwater data collected during the 2018 SI also were included in the geology/hydrogeology analysis. The Installation-wide data have been used frequently for groundwater investigations at SVDA. Reference to these data was inadvertently omitted in UFP-QAPP Worksheet #13a.

7. Section 3.1, Field Investigation Activities, Page 3-1; Figure 5-1, SVAD-067 Fire Training Area, Page 5-2; and, Figure 6-1, SVAD-084 Scrap Wood Open Burn Area, Page 6-2: The location description of the groundwater monitoring wells installed, and groundwater samples collected is inconsistent with the Figure depiction. The text in this section states that the groundwater samples were collected at and downgradient from SVAD-067 and SVAD-084. However, Figures 5-1 and 6-1 show the groundwater monitoring well locations as being within each site. Revise the SI to state that the groundwater samples were collected from groundwater monitoring wells located within SVAD-067 and SVAD-084.

Response: The text was clarified to convey that the groundwater samples were collected at and downgradient from **the source areas at** SVAD-067 and SVAD-084.

8. Section 3.2.1.1, Visual Inspections, Page 3-2: Section 3.2.1.1 states, "A visual inspection was conducted at the SVAD-067 and SVAD-084 areas prior to initiating drilling activities for monitoring well installation." However, documentation of the visual inspections is not provided and/or referenced in the SI. Revise the SI to include an appendix of the visual inspection documentation (notes, photographs, identified surface water drainage patterns, etc.).

Response: The visual inspection was conducted prior to drilling activities to ensure the proposed sample locations did not require adjustment due to field conditions (e.g., topography). The sample locations did not require modifications. Field notes from the well installations and sampling were included in Appendix B.

9. Section 3.2.1.4, Groundwater Monitoring Well Installation, Page 3-3: The text states, "The potable water used for hydration and decontamination activities was sampled during the event." However, analytical results for the potable water are not included in the SI. Revise the SI to include the results of the potable water sample.

Response: The potable water sample results were added to Appendix E.

10. Section 3.5, Disposition of Field Investigation-Derived Waste, Page 3-7: The text states, "Veolia advised Leidos to analyze for suspected contaminants based on site history and previous investigations." However, the SI does not indicate whether the investigation-derived waste (IDW) was analyzed for PFAS. Revise the SI to include PFAS results for IDW samples, if available. If PFAS was not analyzed, discuss how proper IDW disposal was achieved without such analyses.

Response: The PFAS sample results from the investigation were provided to Veolia. The waste hauler deemed the data were adequate at the time for determining the proper method for IDW disposal.

11. Section 4.1.2, Laboratory Sample Receipt, Page 4-1: This section states that "All insufficiencies and/or discrepancies were reported immediately to the Laboratory Project Manager, who notified Leidos within 24 hours to determine if resampling was required." However, it is unclear what those insufficiencies and/or discrepancies were and if resampling was required. Revise Section 4.1.2 to discuss all sample receipt insufficiencies and/or discrepancies and whether resampling was required.

Response: Section 4.1.2 was revised as follows:

"All samples received by the Laboratory Sample Custodian or designee were checked for proper preservation (e.g., pH, temperature of coolant blank above $2^{\circ}C$ or below $6^{\circ}C$); integrity (e.g., leaking, broken bottles); and proper, complete, and accurate documentation and ID of the samples. The temperature of the coolant blank was noted. No insufficiencies and/or discrepancies were noted."

12. Section 4.5.4, Third-Party Data Validation, Page 4-4: The first sentence in the second paragraph states that Table D-4 in Appendix D (Data Quality Assessment) provides a comparison of data qualifiers applied by Leidos and the third-part validator; however, this information is provided in Appendix D, Table D-5. Revise Section 4.5.4 to reference the correct table in Appendix D.

Response: The sentence was revised as suggested.

13. Section 4.6.1, Precision, Page 4-5 and Appendix D, Section D.3, Field Quality Control Assessment, Page D-4: Sections 4.6.1 and D.3 indicate that the acceptance limit for field duplicate samples is a maximum relative percent difference (RPD) of 50%; however, the Addendum 2 QAPP indicates that the field duplicate acceptance criteria for aqueous samples is RPD < 30%. Revise the SI Report to reflect the correct acceptance limit for field duplicate samples and discuss any field duplicate exceedances based on the corrected acceptance limit.

Response: The SI Report was revised to reflect the correct acceptance limit for field duplicate samples and exceedances were discussed, as suggested in Appendix D. Note: Although the RPD did exceed 30 percent for perfluorononanoic acid, the results in the primary and field duplicate sample were less than five times the sample-specific LOQ, in which case the absolute difference between the results is allowed to be within three times the sample-specific LOQ. In this case, the sample-specific LOQ was 1.8 ng/L and the difference was only 0.51 ng/L.

14. Figure 5-1, SVAD-067 Fire Training Area, Page 5-2; Figure 5-2, SVAD-067 Fire Training Area Analytical Results, Page 5-4; Figure 6-1, SVAD-084 Scrap Wood Open Burn Area, Page 6-2; and, Figure 6-2, SVAD-084, Scrap Wood Open Burn Area Analytical Results, Page 6-3: The SI site-specific figures for each of the sites assessed do not display the location of all relevant current and historical site features discussed in Sections 5.1 (Site History) and 6.1 (Site History) (e.g., outfall areas, storage tanks, etc.). Revise the site-specific figures to include relevant site features for sites SVAD-067 and SVAD-084.

Response: Additional site features were added to site-specific figures for SVAD-067, as requested. The relevant site feature for SVAD-084 is the location of the burn pile. The burn pile location is identified on the figures for SVAD-084.

15. Section 6.1, Site History, Page 6-1; Figure 6-1, SVAD-084 Scrap Wood Open Burn Area, Page 6-2; and, Figure 6-2, SVAD-084, Scrap Wood Open Burn Area Analytical Results, Page 6-3: Based on Figures 6-1 and 6-2, MW-84PFAS-02 was advanced in the "IRA Actual Remediation Area"; however, it is unclear how advancement of a monitoring well within a previously excavated area is appropriate to investigate site conditions and a source area. This is of note given that Section 6.1 indicates that "approximately 3,232 tons of nonhazardous soil and debris were excavated and disposed of offsite." As such, the analytical results from MW-84PFAS-02 may be under-representing the site conditions and the source area. Revise the SI to clarify how advancement of a monitoring well within a previously excavated area is appropriate to investigate site conditions and a source area.

Response: The SVAD-084 open burning activities ended circa 2000 after at least 20 years of use as a fire training area. The interim removal action was conducted in 2016. PFAS compounds are known to be extremely mobile in the environment, and it is reasonable that substantial migration of contamination had occurred during 35 years since fire training was initiated at the site. In addition, the depth to groundwater at this site is approximately 45 feet BLS. The interim removal action was limited to the top 1.5 feet of soil and was unlikely successful at removing all PFAS contamination in soil.

16. Appendix A, SVDA Drinking Water PFAS Data: According to Appendix A (PDF Page 61 of 120), the field blank sample collected on September 26, 2016 (NLS ID: 948929) was not analyzed for PFAS; however, the SI does not discuss why the field blank sample was not analyzed for PFAS. Revise the SI to clarify why the field blank sample collected on September 26, 2016 (NLS ID: 948929) was not analyzed for PFAS.

Response: The 2016 drinking water sampling was conducted by the Army to fulfill UCMR3 sampling requirements. The quality control data from 2016 do not impact the 2018 SI.

17. Appendix D, Data Quality Assessment, Section D.4.2, Data Verification/Data Validation Comparison, Page D-5: The first and last sentences in the first paragraph of this section state that Table D-4 provides a comparison of data qualifiers applied by Leidos and the third-part validator; however, this information is provided in Table D-5. Revise Section D.4.2 to reference the correct table.

Response: Section D.4.2 was revised to refer to Table D-5, as suggested.

18. Appendix D, Data Quality Assessment, Tables D-1 through D-5, Pages D-7 to D-9: Tables D-1 through D-5 in Appendix D are incomplete. The tables do not clarify if the information provided in each table is for the primary sample or the split sample. In addition, Section D-2 of Appendix D states that "All data validation qualifiers applied to the data are presented in Table D-2." However, Tables D-3, D-4 and D-5 include qualified data that is not listed in Table D-2; and further, Table D-5 includes qualifier letter and number codes that are not defined in the table or discussed in the Appendix D text. For example, "DNR" is listed as a validation qualifier in Table D-5, but the "Overall Assessment" section in Attachment A (EcoChem Data Validation Report) of Appendix D states, "Data flagged DNR should not be used. All other data, as reported, are acceptable for use." Finally, the column headings in Table D-5 need clarification. The difference between "Parent Qualifier," "Validation Qualifier," and "Duplicate Qualifier" is unclear, and the table does not specify if the qualifiers listed were applied by Leidos or EcoChem. Revise Tables D-1 through D-5 to provide complete information.

Response: The split sample was collected and analyzed solely for the purpose of determining how well the results agreed with the primary laboratory and did not undergo data validation. As shown in Table D-4, the comparison between the primary laboratory results and the QA laboratory results was very good, indicating acceptable agreement. Sections D.2 and D.3.1 were revised to clarify that only the results from the primary laboratory were validated and the QA split sample was not validated.

The title of Table D-2 was revised to Leidos Applied Data Validation Qualifiers. Section D.2 states the following: "All data validation qualifiers applied to the data are presented in Table D-2." This sentence

was revised to state: "All data validation qualifiers that resulted from the Leidos data validation process are presented in Table D-2." In some instances where the third-party validator assigned DNR to some of the results, Leidos chose to use the result from a different dilution because the other result was higher and was still within calibration range of the instrument, thus keeping the more conservative value. Section D.4 was revised to clarify the confusion regarding the third-party data validation assessment presented in Section D.4. In addition, Table D-5 was revised to show all Leidos-applied qualifiers and all of the qualifiers applied by the third-party data validator and the corresponding discussion was revised to include the reason behind not using the third-party data validator's suggested use of the data in instances where this occurred.

19. Appendix E, Data Presentation Tables, Page E-1: Tables E-1 (Site 67 PFAS Data Presentation) and E-2 (Site 84 PFAS Data Presentation) present results that are shaded pink with a [P] code and results that are shaded orange with a [PG] code, but these colors and codes are not defined. Revise Appendix E to define the pink and orange shading and [P] and [PG] codes, and ensure their significance is discussed in the SI Report.

Response: Appendix *E* was revised to define the bracketed letters in footnotes for clarity.

Comments from EPA Federal Facilities Restoration and Reuse Office

1. The scope of the SI should be expanded to consider other potential sources of PFAS in the environment (including PFAS beyond PFOA and PFOS) or a rationale should be provided as to why the scope was limited to AFFF areas and these two PFAS.

Response: AFFF has been the predominant source of PFAS chemicals in the environment related to Army activities. The site history at SVAD-067 and SVAD-084 indicated potential use of AFFF products at these sites and was confirmed with the interview with the fire chief. The samples collected during the SI were analyzed for the six UCMR3 PFAS analytes, and the data are provided in Appendix E. PFOS and PFOA were focused on in the text because the USEPA has established health advisory levels for those constituents. The text was revised to include data for the six UCMR3 PFAS analytes.

2. A Conceptual Site Model (CSM) would help to provide context for the interpretation of the results from the sampling. EPA recommends that a CSM be included in with this report.

Response: A CSM was integrated into the SI Report for each site, as requested.

3. Please add a discussion of any drinking water wells that may be located near the base boundary. Please include justification for not sampling these wells. Also, please discuss how seasonal groundwater flow reversal impacts PFAS groundwater contamination. Describe how groundwater sampling is designed to account for these changes.

Response: The intent of the SI was to determine the presence/absence of PFAS due to AFFF use at SVAD-067 and SVAD-084; therefore, sampling drinking water wells at the base boundary was outside the scope of the investigation.

It is uncertain how seasonal groundwater flow reversal impacts PFAS groundwater contamination based on data from a single PFAS sampling event. Based on previous investigations of other contaminants (such as TCE) at SVAD-067, it can be expected that because reverse flow conditions, also characterized by higher groundwater elevation, occur most commonly in the spring, the highest contaminant concentrations would occur in the spring. This may be in part because groundwater concentrations increase when water levels are higher due to possible release of contaminant concentrations sorbed to soil. The seasonal groundwater flow reversal also may slow plume migration.

Groundwater samples were collected from potential PFAS release areas, as well as upgradient of and downgradient from the potential source areas. The groundwater sample from the northernmost well at

each site was placed to establish whether the periods of groundwater flow reversal have impacted groundwater in the typically upgradient direction from the source areas.

4. According to this report, there are no surface water features located on the study locations and groundwater is likely entering the Mississippi River. Releases of contaminated groundwater to the Mississippi River should be further investigated, given the importance of the River as a drinking water source.

Response: The intent of the SI was to determine the presence/absence of PFAS at SVAD-067 and SVAD-084 due to AFFF use; therefore, the requested evaluation is outside the scope of this SI.

5. Please clearly state in Section 4.2 if Method 537 was modified to measure PFAS in groundwater.

Response: The second sentence in Section 4.2 was revised as follows:

"All samples were analyzed for PFAS using modified USEPA Method 537 Version 1.1 (USEPA 2009), the DoD QSM Version 5.1, and the laboratory SOP during the October 2018 sampling event."

USEPA Method 537 Version 1.1 (USEPA 2009) is a drinking water method. The method was modified per DoD QSM Version Table B-15 specifications and the laboratory SOP to accommodate environmental samples. USEPA reviewed the laboratory SOP and provided comments dated July 26, 2018. All comments were adequately addressed and documented in Army responses dated August 7, 2018.

6. The Assistant Secretary of Defense recently issued guidance directing PFAS investigators to use a screening level of 40 parts per trillion for PFOA and PFOS (ASD Memorandum for Assistant Secretaries of the Army, Navy, Air Force, National Guard Bureau and Defense Logistics Agency, October 15, 2019). U.S. EPA also recently issued guidance recommending a screening level of 40ng/L for PFOA and PFOS ("Interim Recommendations to Address Groundwater Contaminated with Perfluorooctanoic Acid and Perfluorooctanesulfonate, OLEM Directive No. 9283.1-47, December 19, 2019"). The PFOA and PFOS results from the monitoring wells should be re-screened using the updated screening level.

Response: The draft final revision 1 SI Report for PFAS at SVAD-067 and SVAD-084 was submitted for USEPA and IEPA review prior to the Assistant Secretary of Defense October 2019 issued guidance directing PFAS investigators to use a screening level of 40 parts per trillion for PFOA and PFOS. The SI Report was updated to screen the PFOS, PFOA, and PFBS results based on this guidance.

7. Please describe LUCS that may be in place to prevent use of base groundwater. Also, please provide language that describes how/where in the base master plan PFAS contamination information will be tracked and stored.

Response: LUCs are not currently in place to prevent future exposure to PFAS in groundwater at SVAD-067 or SVAD-084. Evaluating LUCs is outside the scope of an SI. If necessary, LUCs would be evaluated during an FS.

IEPA Review of the Site Inspection Report for Per- and Polyalkyl Substances at SVAD-067 – Fire Training Area and SVAD-084 – Scrap Wood Open Burn Area, Draft Final, Revision 1, Savanna Army Depot Activity, Savanna, Illinois, October 2019

Comments: January 13, 2020 Responses: January 25, 2021

1. Section 1.4, Regulatory Overview and Project Action Limits: Please be advised that Illinois is preparing a revision to its groundwater quality regulations, including an extensive update to groundwater quality standards for Class 1 and Class 2 groundwater. Among the likely proposed changes, will be new Class 1 groundwater quality standards for several PFOS/PFOA compounds, including:

Constituent	Proposed Class 1 Standard (mg/L)
Perfluorobutane Sulfonic Acid (PFBS)	0.14
Perfluorohexane Sulfonic Acid (PFHxS)	0.00014
Perfluorononanoic Acid (PFNA)	0.000021
Perfluorooctanoic Acid (PFOA)	0.000021
Perfluorooctane Sulfonic Acid (PFOS)	0.000014
Combined PFOA + PFOS	0.000021

When these standards are adopted by the Illinois Pollution Control Board, these standards will be promulgated, enforceable, and of general applicability to groundwaters of the State, and will be applicable or relevant and appropriate requirements (ARARs) for the sites. Until adopted, these propose standards are "to be considered" (TBC) for any actions.

Response: Comment noted.

2. Section 3.2.1.3, MEC Avoidance: State what the results of the MEC clearance efforts were; presumably nothing was found.

Response: Prior to initiating intrusive activities, the SUXOS cleared all proposed boring locations using a Schonstedt handheld magnetic locator to verify the absence of potential subsurface UXO or other metallic obstructions. Section 3.2.1.3 was revised to indicate no metallic anomalies were detected at SVAD-067 and SVAD-084.

3. Section 7, Summary and Conclusions: The conclusion of "no action" is not consistent with the decision rules in the Final Quality Assurance Project Plan (QAPP, August 2018, Worksheet 11a). The QAPP indicates that further sampling will occur if the project action limits (PALs) are exceeded. Both sites demonstrated detections above the PALs; further sampling should occur.

Response: The SI Report was revised to recommend SVAD-067 and SVAD-084 for further investigation.

4. Section 7, Summary and Conclusions: The report states that no action is planned because the groundwater at these sites is not a source of drinking water and that no exposure is expected at either site due to the depth of groundwater. The average depth to groundwater at Site 67 is about 16 feet with groundwater levels as shallow as 4 feet. Groundwater could be encountered at this site during construction activities; thereby presenting a risk. Regardless, Illinois EPA advises the Army that action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) is required if there is a potential of current or future risk at a site. This could be the case at Site 67, and the CERCLA process should be followed to determine extent of contamination, degree of risk associated with such exposures, and need for remediation for this pathway. Additionally, the CERCLA/NCP requirement to

define nature and extent of contamination needs to be met, and it appears this was the Army's original intent, based on the QAPP.

Moreover, Illinois has primacy over groundwater pursuant to USEPA's July 29, 1997 endorsement of its program developed to meet USEPA's Comprehensive State Groundwater Protection Program (CSGWPP). When Illinois' groundwater quality standards are exceeded, Illinois statute (415 ILCS 55 and 415 ILCS 5) and rule (35 Ill. Adm. Code Part 620) require corrective action until the exceedance(s) are abated. Protection of future beneficial uses of groundwater is a priority of Illinois' groundwater program. Active corrective action is to be undertaken for impacted Illinois groundwaters whether or not they are being actively used.

Additionally, the State's non-degradation provision of its groundwater regulations (35 Ill. Adm. Code 620.301) prohibits the release of any contaminant that may compromise a potential use of such groundwater. Since the groundwater at the installation is Class I, ongoing contamination at Site 67 and 84 needs to be addressed.

The State's non-degradation provisions do not preclude the establishment of a groundwater management zone (GMZ) to manage such releases, but the requirements for establishing a GMZ would need to be met, including determining the vertical and horizontal extent of any plumes.

Response: The SI Report was revised to recommend SVAD-067 and SVAD-084 for further investigation.

5. Until the above comments are resolved, Illinois EPA does not concur with the Army's conclusion for no further action for either site.

Response: Comment noted.