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MINUTES AND AGENDA FOR RESTORATION ADVISORY BOARD MEETING HELD 10  
SEPTEMBER 2009 NAS SOUTH WEYMOUTH MA  
09/10/2009  
NAVAL AIR STATION SOUTH WEYMOUTH



# Naval Air Station South Weymouth, MA Restoration Advisory Board (RAB) Meeting Minutes September 10, 2009

## **1. INTRODUCTIONS/ APPROVAL OF PRIOR MEETING MINUTES**

John Goodrich, RAB facilitator, opened the meeting at approximately 7:00 PM. He requested that all attendees, including RAB members, regulators, and audience members, introduce themselves. He noted that the meeting agenda, handouts, and the sign-in sheet were available on the front table. The sign-in sheet for the meeting is provided as Attachment A to this meeting summary. J. Goodrich asked if everyone had time to read the minutes from the July 2009 RAB meeting and if there were any comments. There were no comments on the minutes.

J. Goodrich reviewed the ground rules for the meeting and reminded the meeting attendees that the focus of the meeting is cleanup issues; redevelopment issues will be placed on the 'parking lot.' He reviewed the guidelines for the meeting and reminded the participants when asking questions to wait to speak until they are acknowledged, to state their names and affiliations, and to speak clearly or into the microphone when they have questions.

J. Goodrich then reviewed the agenda for the meeting. The meeting agenda and the Action Item Tracking List are provided as Attachment B to this meeting summary. In accordance with the agenda, the presentation and discussion would be followed by the Updates and Action Items portion of the meeting.

## **2. PRESENTATION**

D. Barney stated that the former Sewage Treatment Plant (STP) has been discussed at other RAB meetings, and introduced Kirsten Meyers (Tetra Tech EC) to give the presentation on the STP remedial action. K. Meyers stated that she would provide a brief history of the Site and then discuss the remedial action that has recently been performed. She stated she is the field engineer for this Site. There were two excavation areas, uplands area and ditch, as part of the STP remedial action. Selected slides from the presentation are included in Attachment C.

In the 1940's, the Navy constructed a tile bed area that was used for treatment of Base sanitary wastewater. The tile bed area was used until 1953, when the STP was constructed. The STP was used until 1978 when the Base wastewater system was connected to the municipal sewer system. The

majority of structures on the Site were demolished in 1992, except for the sludge drying bed area, which is a canopy area that has recently been used to store roadway sand and salt. See Slide 2.

The previous investigations at the STP included a Phase I RI (1996), Phase II RI (1999 and 2000), and a Supplemental Sampling Event and Risk Evaluation (2006). Analytical data were collected during these events to assess the need for a remedial action. In the 2007 FS, unacceptable risks were identified at 5 locations. The risks were due to PAHs, pesticides, or pesticides and metals. This led to the ROD (2008) and the Navy's selected remedy of excavation and off-site disposal. The ROD also included a pre-design investigation (PDI) which was completed in 2009. The PDI was performed to further characterize the Site and address data gaps prior to completion of the remedial action.

A Final Remedial Action Work Plan was submitted (2009), with consultation from the Tri-Town CONCOM, EPA, and MassDEP. K. Meyers explained the STP treatment process; the treated effluent was discharged to the ditch at a headwall in the northwest part of the Site. The ditch was built up with a high angle slope so the sanitary system could work without too many pumps. Slide 3 presents the areas of exceedances of the risk-based cleanup goals which were the excavation areas for the STP remedial action. The proposed excavation was to a depth of 1 foot. There were PAH exceedances in Areas A-1 and A-2; 25 cubic yards and 300 cubic yards were excavated, respectively. There were pesticide exceedances in Area B-1; 60 cubic yards were excavated. In Area B-2 and Area D there were exceedances of pesticides and metals; 55 cubic yards and 60 cubic yards were excavated, respectively.

The remedial action had two objectives. The first objective is to reduce the level of risk to human health and the environment. The second objective is to monitor the sediment and groundwater to ensure that no source remains after the excavation activities are completed.

The field activities began on July 20, 2009 and included the following (Slide 4):

1. Clearing/installation of erosion controls
2. Excavation of upland areas (A-1, A-2, B-1, and B-2)
3. Excavation of ditch sediment (Area D)
4. Field screening and confirmatory sampling (A field screening technique was used and samples were also sent to a laboratory to confirm the field screening results). Note: The remedial action is an iterative process, as digging was occurring, a confirmatory sample was collected and this was repeated until clean soil was found.
5. Site restoration. Clearing was limited and the Site will be reseeded and allowed to return to its natural state.
6. Transportation and Disposal, which includes removal of a pre-existing stockpile.

Erosion control measures around the excavation areas included silt fence and hay bales. A security fence was installed to limit access to the area. An excavator and a loader were used in the upland excavation areas. The soils were directly loaded into the loader to minimize handling of contaminated soil and attempts were made to minimize disturbance to the area. The soils were stored in stockpiles under the canopy and are now covered, so the excavated materials are well contained. Areas B-1 and B-2 were wooded and hilly. The excavation depth was again 1 foot, and the areas surrounding trees were hand-excavated to prevent disturbance to the tree roots.

The ditch excavation used a vactor truck and excavator, which allowed for minimum disturbance and minimal impact on the trees. As a preventative measure, a pipe way was installed from the headwall to the ditch, to direct water away from the area to be excavated and keep the sediment dry during excavation. Filter fabric was used to keep sediment out of the pipe and to minimize sediment movement (Slide 5).

Slide 6 presents an example of the field screening process used during excavation. Step 5, site restoration, has not been completed because work is ongoing, but the plan is to restore the Site to the pre-remedial action conditions. The excavations were completed on September 8, 2009. The confirmatory samples have all been submitted to the laboratory but the results have not all been received (Slide 7). The excavations at A-1 and B-1 are complete based on confirmatory sampling and comparison to remedial goals. Area A-2 has elevated levels of PAHs based on confirmatory analysis; they are still waiting for the results for Area B-2 and the ditch. The next steps are shown in Slide 8. All of the data needs to be evaluated and then it will be determined if more excavation is required to meet the remedial goals. After it is confirmed that the excavation has reached the remedial goals in all areas, restoration will occur. Then post-excavation groundwater and sediment monitoring will be completed and the project completion report will be submitted.

K. Hayes asked why the pesticides were found at the Site. D. Barney stated that there was historical information indicating that an old pesticide shed was present on the Site (cannot be confirmed). Also, during the demolition of the buildings there was a lot of soil movement which could account for the high pesticide areas.

M. Parsons asked where the swale discharges. D. Barney responded that it ultimately discharges into French Stream. K. Meyers stated that they will sample as far as needed in the ditch (down gradient) to meet the cleanup goals. D. Barney added that while the STP was functioning samples were collected quarterly in French Stream as part of the STP permit. In addition, French Stream and the sediment in French Stream have been recently evaluated as part of the EBS process.

M. Parsons asked about the source of the arsenic. D. Barney stated he was unsure of the source. Arsenic was a component of the pesticides used at the Base but arsenic also occurs on the Base naturally.

M. Parsons asked why only 1 foot is being excavated. D. Barney stated that the excavation depth was based on the RI and risk assessment. The surface soil was the only media that exhibited risk. The depth to groundwater is approximately 8 feet in the A areas. The groundwater in the remaining areas is very near the surface, or at the surface in the case of the ditch.

D. Galluzzo asked how far the former STP is from the planned new sewage treatment plant. D. Barney said the location of the new plant is approximately 0.5 mile south/west and is closer to French Stream.

J. Marques noted that the ROD-selected remedy stated excavation and disposal or recycling. What does the recycling portion mean? K. Meyers stated that recycling is often discussed in reference to asphalt batch recycling. When a large petroleum spill occurs the contaminated soil can be used to make asphalt. This was not relevant to the STP action because the PAHs were not at high enough concentrations to make asphalt batching feasible. B. Olson added that the excavated soils will be used for a daily cover at a landfill, which can be considered recycling. D. Barney clarified that there is not enough petroleum in the soil to make it useable for asphalt batching, however this soil is appropriate for daily cover of general refuse at a municipal landfill.

D. Galluzzo asked why it took so long (1996-2007) to confirm that there was a risk at this Site. D. Barney stated Navy was aware of the potential risk early on, but continued sampling to confirm the extent of contamination and the specific areas where the risk resulted in the need for an action. D. Galluzzo asked if there are other sites that could still be uncovered. D. Barney stated that the process followed was thorough in identifying sites and areas of interest.

A. Hilbert asked where the historical information was stored. D. Barney stated that much of the historical base information was stored in the Caretaker Site Office (CSO) and every 5 years the Navy completed a master plan for the Base which included a lot of this historical information. In addition, a great deal of first hand knowledge was gained from the people working on the Base. A. Hilbert then asked what is stored in Virginia. D. Barney stated he was unsure if there was relevant information being stored in Virginia. He noted that Virginia is the eastern headquarters for the Navy facilities engineering command.

D. Galluzzo asked where the STP was located. D. Barney responded that the STP was located in Weymouth. D. Galluzzo then asked if the towns were ever advised that the STP was leaching to French Stream. D. Barney stated that he assumed that town officials would have been aware of this fact.

P. Scannell asked if the ditch was designed to transport material to French Stream. D. Barney responded in the affirmative. P. Scannell then suggested that the ditch be closed off so no more water can discharge to French Stream. D. Barney stated that this was not considered by Navy because the ditch carries little water now and dries up before the headwall located at the northern runway clear zone. The 1 foot of soil is being removed so that water entering the ditch will no longer contact contaminated soil.

K. Hayes asked for confirmation that if contamination is found it will be excavated. D. Barney responded, yes it will be excavated.

M. Byram asked about digging around the tree roots - is there any contamination being taken up by the trees? B. Olson and K. Meyers both responded that sometimes metals will be taken up, but not pesticides.

M. Byram asked where the headwall at the top of the ditch is located and what is there. D. Barney stated it was at the extreme northern portion of the ditch. It is functionally a discharge from a pipe to an open culvert. The pipe structure came from the STP to the discharge point at this headwall. The treated effluent then flowed through the ditch to another headwall by the clear zone that has a large pipe, approximately 4 feet in diameter. This pipe also drains the wetlands north of the runway (clear zone). This large pipe daylights at an open ditch approximately 50 yards east of French Stream. Samples have been collected and laboratory analysis performed at this location of French Stream under the EBS program.

J. Marques asked if the health studies (MDPH) could be used to tie health issues to the Base. Is there a tie in with the arsenic? A. Malewicz stated that at Superfund sites investigations focus on the source of the contamination. The risk is based on various exposure factors. Superfund work is based on removing the sources, tracing down residual contamination, and determining future risk. This is independent from a study, such as the MDPH study, which is based on past exposures. There are two different objectives to these studies. She agreed that this is a valid question and the MDPH report is still outstanding. The lead for this report is Suzanne Condon, [Suzanne.condon@state.ma.us](mailto:Suzanne.condon@state.ma.us).

B. Olson added that there was an e-mail from D. Wilmot to S. Condon asking the same question. Her response was that a peer review has been completed and the report is being finalized and will be out soon. The DPH is going to focus on past exposures. M. Parsons stated that she had been in touch with S. Condon and Mike Morrissey's office and they stated that it was a data study and there are privacy concerns.

D. Galluzzo asked when the soil from STP will go off site. K. Meyers stated that after excavation is complete and the confirmatory results indicate that the remedial goals have been achieved, the stockpiled soil has to be characterized for disposal purposes. Characterization takes about 10 days and then the soil will be removed for off-site disposal. D. Barney stated it is in a secure location under the canopy, with a layer of poly underneath and covered with poly sheeting, as well as the rooftop.

### **3. UPDATES AND ACTION ITEMS**

Action Items: Evaluate possible methods to solicit new RAB members. D. Barney stated that he and J. Cunningham had not been able to get together but will follow up on opportunities to increase membership.

RAB Administrative Actions: D. Barney stated the biggest decision is a venue for future meetings. He mentioned that the New England Wild Life Center has a nice facility on Columbian Street in Weymouth and there may be a function room available. Alternatively, the RAB meetings could remain at the CSO. There was support for the NE Wildlife Center. D. Barney will look into it.

P. Scannell asked why the RAB meetings had left the conference center. D. Barney stated there was a mold issue so everyone agreed that moving to a different location would be prudent.

A. Hilbert asked about the situation with the land transfer. D. Barney stated there was no new information.

MassDEP Update: D. Chaffin stated there was nothing to report (no active sites).

IR/EBS Program Site Update: D. Barney referred to the August update on table. The Building 82 draft final RI report was distributed and is available at the four libraries. It is too large to be transmitted electronically, but Dave will burn a CD if requested. The draft FS is in internal review and due out later in September. The Building 81 Work Plan Addendum has been completed. The field work at Building 81, Building 82, and SRA will be starting later in September. Additional supplemental data gathering, well installation, and data will be collected at all three sites.

The WGL design is underway and a draft is due in October. The RDA semi-annual LTM event is underway. The EBS sites are all in reporting stages. There was additional field work completed at RIA 111, including geophysics to identify sub slab structures, and test pitting activities. The next steps will be determined after the laboratory results have been received and evaluated. The EE/CAs for Main Gate and AOC55C will be revised and submitted for public review soon.

M. Bromberg asked what additional work is being conducted at Building 81 and SRA. D. Barney stated that the work plans are for supplemental data gathering on the basis of comments on the draft RI reports. Field work investigations for the sites were conducted in 2005-2006. The reports were developed in 2007, submitted, and comments were received. The comments revealed areas of uncertainty that needed further investigation and a Work Plan Addenda was developed for each site to address these uncertainties. The Work Plan Addenda have been finalized, and the locations have been reviewed and confirmed with the regulatory agencies. The field work is scheduled to begin at the end of the month. At Building 81 there will be additional shallow and deep overburden groundwater wells and additional shallow and deep bedrock wells. There will be soil vapor assessment over the slab of the old building. There will be similar activities at the SRA, including additional monitoring wells at various intervals to reduce the level of uncertainty with the characterization and understanding of the Site.

M. Parsons asked how many times in-situ oxidation was tried at Building 81. D. Barney stated that ISCO was tried three times but it was not successful enough at reducing concentrations in the wells with PCE to make it a cost-effective solution. It did nominally address the petroleum constituents (BTEX), but not all contaminants. It did not work as anticipated.

P. Scannell stated he had asked for a specific wetlands report at the last RAB meeting. D. Barney noted that the tape recording from the July meeting would be checked to determine what report he was looking for.

J. Cunningham suggested RIA 104 as a future topic. P. Call stated that a Decision Document for Old Swamp River is in review. The document evaluates the data from the northern tributary, southern tributary, and Old Swamp River, as well as health assessments and ecological assessments performed to support the closeout of this Site (RIA 104). The Decision Document should be available at the libraries Monday September 14, 2009.

K. Hayes asked if the RDA was discussed during the last RAB meeting. P. Call stated that the last meeting covered the status of all of the active sites, including RDA, but details weren't provided.

FOST/FOSL Update: D. Barney discussed the Finding of Suitability for Transfer (FOST) 5B (see Attachment C slides). The draft FOST 5B was submitted for comments in the late summer. FOST 5B included seven subparcels including: RDA, Old Swamp River, portions of the East Mat Ditch and other areas associated with TACAN project, and AOC 110 (approximately 36 total acres). Since RDA and Old Swamp River will not be ready for transfer by the end of the fiscal year, FOST 5B has been split into two parts. RDA and Old Swamp River have been removed from FOST 5B so that FOST 5B-1 can be signed this month and the land will be available for transfer. FOST 5B-2 will include Old Swamp River

(outstanding comments to be resolved on the RIA 104 Decision Document) and LUCIP needs to be finalized for the RDA. Once those outstanding issues are resolved, FOST 5B-2 will be signed by Navy and this acreage will be available for transfer.

K. Hayes stated he thought that the Navy was not going to transfer the RDA to Tri-Town. D. Barney responded that all of the property has to be transferred to SSTTDC according to Congress; it is whether or not they transfer the responsibility of long term monitoring (LTM) that is a question. K. Hayes asked if Navy will maintain control of LTM at the RDA. D. Barney stated that even after the land is transferred the Navy will oversee LTM at the RDA.

SSTTDC Update – J. Young stated that the next board meetings are scheduled for September 14, September 28, October 13 (Tuesday), and October 26 (generally the second and fourth Mondays of every month). The September meeting will most likely discuss the tax plan and the tax rate. Agendas have not been set for October. If you would like to call the office the day of the meeting to obtain additional information the main number is 781-682-2187 and Mary Cordeiro usually fields the general phone calls.

A. Hilbert asked if the Delahunt bill is final. D. Barney responded that as of today it was not.

D. Galluzzo asked who is on the SSTTDC conservation commission. J. Young stated that the members of the conservation commission are the five board members. S. Ivas is the conservation administrator. He has a master's degree in resource management and administration. D. Galluzzo asked about the credentials/degrees of the board members. J. Young did not have that information.

D. Galluzzo stated that July 31, 2009 was the stated deadline regarding the land transfer. J. Young stated that SSTTDC is still in discussions with the Navy regarding the remaining land.

#### Conclusion/Next Meeting

J. Goodrich wrapped up the meeting. Suggestions for topics for the next meeting include:

- RIA 104
- AOC 55C
- LUCIP

The next RAB meeting will be the second Thursday in November (November 12, 2009). The location will be announced prior to the meeting.



# AGENDA

## Naval Air Station South Weymouth, MA Restoration Advisory Board (RAB) Meeting Agenda

September 10, 2009

Conference Center on Shea Memorial Drive

7:00 PM

<i>Agenda Items</i>	<i>Item Lead</i>	<i>Projected Time</i>
1. Introduction, Review of Meeting Notes	Facilitator	7:00 - 7:15
2. Former STP Remedial Action	Navy	7:15 - 8:15
3. Updates and Action Items	Navy	8:15 - 8:30
4. Questions, Agenda Items, Next Meeting	Facilitator	8:30 - 9:00

**Facilitator:** John Goodrich, Massachusetts Office of Dispute Resolution & Public Collaboration

### Restoration Advisory Board (RAB) Members:

**Abington:** James Lavin, (Alternate: Steve Ivas); Phil Sortin (Alternate: Beth Sortin)

**Hingham:** no current representation

**Rockland:** no current representation

**Weymouth:** James Cunningham (Community Co-Chair); Ken Hayes; Dan McCormack; Steve White

**Navy:** Dave Barney (Navy Co-Chair)

**EPA:** Kymberlee Keckler (Alternate: Bryan Olson)

**MA DEP:** David Chaffin (Alternate: Ann Malewicz)

### BRAC Cleanup Team (BCT) Points of Contact:

**Navy:** Dave Barney, BRAC Environmental Coordinator, Base Realignment and Closure, Program Management Office, Northeast (617) 753-4656  
Email: [david.a.barney@navy.mil](mailto:david.a.barney@navy.mil)

Brian Helland, Remedial Project Manager, Base Realignment and Closure Office, Program Management Office, Northeast (215) 897-4912  
Email: [brian.helland@navy.mil](mailto:brian.helland@navy.mil)

**MassDEP:** David Chaffin, Environmental Engineer, Federal Facilities (617) 348-4005  
Email: [david.chaffin@state.ma.us](mailto:david.chaffin@state.ma.us)

**EPA:** Kymberlee Keckler, Remedial Project Manager, Federal Facilities Section (617) 918-1385 Email: [keckler.kymberlee@epa.gov](mailto:keckler.kymberlee@epa.gov)

**MassDEP Ombudsman:** David DeLorenzo (617) 292-5774, Email: [david.delorenzo@state.ma.us](mailto:david.delorenzo@state.ma.us)



# ACTION ITEMS

## Naval Air Station South Weymouth, MA Restoration Advisory Board (RAB) Meeting

### September 10, 2009 – Next RAB Meeting

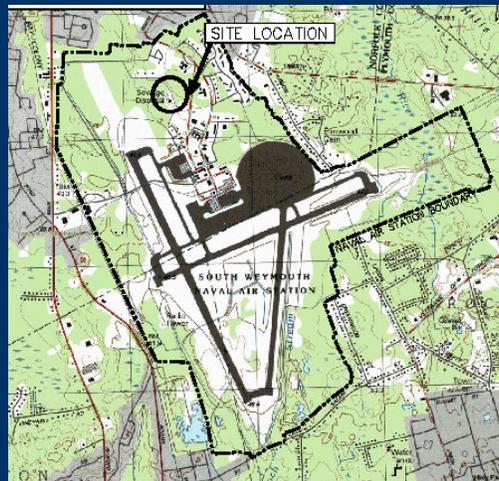
<i>Action Item</i>	<i>Item Lead</i>	<i>Deadline</i>
<b>ACTION ITEMS</b>		
Evaluate possible methods to solicit new RAB members.	RAB Co-Chairs	Next RAB
<b>UPDATES</b>		
RAB Administrative Actions	D. Barney	Each RAB
MassDEP Update	D. Chaffin	Each RAB
IR Program Sites Update	D. Barney	Each RAB
EBS Review Item Areas/ Various Removal Action Update	D. Barney	Each RAB
FOST/FOSL Update	D. Barney	Each RAB
SSTTDC Update	J. Young	Each RAB
<b>COMPLETED ITEMS</b>		
Provide photographs of landfill reuse with parking on cap (5/09)		
Provide update on selection of the Independent Observer (5/09)		
Provide update on TAG/TASC funding (5/09)		
Provide list of constructed sewage treatment systems similar in design to that proposed by SSTTDC (5/09)		
Provide the amount of natural habitat acreage (3/09)		
Provide acreage estimate for FOST 5B and FOST 6 property (3/09)		
Provide ACOE 401 permit to those interested (3/09)		
Provide an update on contract for independent observer (3/09)		
Provide various maps with perimeter streets and an acronym list. (10/08)		
Review suggestions to enhance the public participation process. (9/08)		
Provide FOST 3 and 4 Responsiveness Summaries to M. Bromberg (9/08)		
Send email announcing availability of FOST 5A for review (9/08)		
Discuss the parties involved in the cleanup and development of the Base (9/08)		
Provide suggestions to improve the public participation process. (6/08)		
Check location/depth of peat moved to south end of runway. (5/08)		
Determine Navy's role in the Enabling Legislation. (5/08)		
Provide the AOC 55C HHRA to A. Hilbert, J. Rakers, H. Welch. (3/08)		
Investigate issues with movement of peat during development. (1/08)		
Provide copies of EPA health risk requested by M. Bromberg. (1/08)		
Review routing of piping between STP Site and French Stream. (11/07)		
Provide location of Basewide Assessment floc samples. (10/07)		
Provide copies of parking lot response letter. (10/07)		
Provide groundwater data for transferred land (10/07)		
MDPH MS Study update (8/07)		
List of AULs; what and where they are (4/07)		
Provide vernal pools map to J. Cunningham (4/07)		
Copies of figures from Old Swamp River Study by Beta Group, Inc (3/07)		
Provide Hydrogeologic Investigation Tech Memo to D. Galluzzo (3/07)		
Distribute monthly Navy program status/administrative items update (3/07)		



Site 07 -  
Former Sewage Treatment Plant  
Remedial Action Summary  
September 10, 2009



Location of Site 07



## Site 07 Background

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- 1940's - Tile Bed Area constructed - used for the treatment and disposal of Base sanitary wastewater.
- 1953 - Sewage Treatment Plant (STP) was constructed adjacent to area.
- The STP was used until the Base wastewater system was connected to the municipal sanitary sewer system in 1978. The Navy removed most of the STP structures by 1992.



## Site 07 Background (continued)

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### Previous Investigations -

- 1996 - Phase I Remedial Investigation (RI).
- 1999 – 2000 Phase II RI for the STP site.
- 2006 - Supplemental sampling event and risk assessment.
- Analytical data collected during the sampling events were used to evaluate the need for remedial activities.



## Site 07 Background (continued)

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- 2007 Risk evaluation identified unacceptable risk at 5 areas due to elevated PAH, pesticide, and arsenic concentrations.
- 2008 Record of Decision - Selected Remedy was Alternative 3 – *excavation and off-site disposal or recycling.*
- 2009 Pre-Design Investigation.



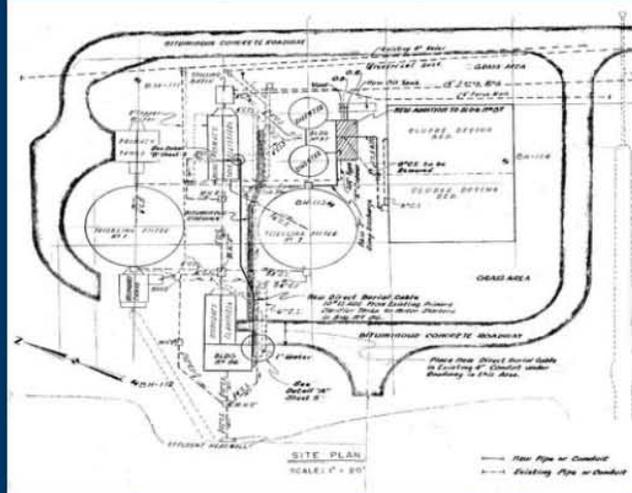
## Site 07 Background (continued)

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- Final Remedial Action Work Plan submitted in July 2009.
- Tri-Town CONCOM, EPA, and DEP were included in the planning activities.



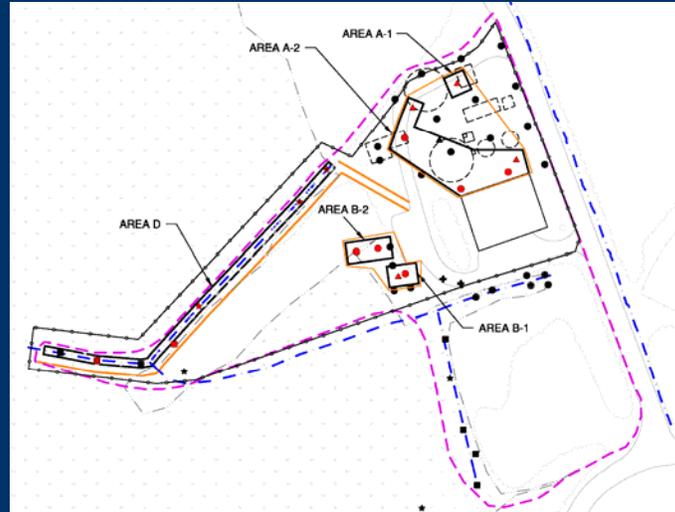
## Former Site Configuration/Buildings



## Former Site Configuration/Buildings



## Site 07 Site Configuration



## Objectives

- Objective 1 - reduce the level of risk to human health and the environment.
- Objective 2 - include monitoring of sediment and groundwater to ensure that no source is left after the excavation activities.



## 2009 Field Activities

- July 20 – Mobilization
- Remediation Sequence
  - Step 1 – Clearing/installation of erosion controls
  - Step 2 – Excavation of upland areas
  - Step 3 – Excavation of ditch sediment
  - Step 4 – Field screening and confirmatory sampling
    - Note: If field screening and/or confirmatory sampling indicates elevated levels of COCs, excavation will continue in those areas.
  - Step 5 – Site restoration
  - Step 6 – Transportation and Disposal (includes removal of one pre-existing stockpile)



## Step 1 – Clearing/Erosion Controls



## Step 1a – Installation of security fence



## Step 2 – Upland Excavation



## Step 2 – Upland Excavation (continued)

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## Step 2 – Upland Excavation (continued)

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## Step 2 – Upland Excavation (continued)



## Step 3 – Ditch Excavation



## Step 3 – Ditch Excavation (continued)



## Step 4 – Screening/Confirmatory Sampling



## Step 5 – Site Restoration



## Status

- All excavations have been completed to the proposed depth (completed 9/8).
- Initial Results:
  - Area A-1 < PRGs (PAHs)
  - Area A-2 elevated levels of PAHs
  - Area B-1 < PRGs (pesticides)
  - Area B-2 awaiting results (pesticides/arsenic)
  - Ditch field screening indicates elevated levels of pesticides in some locations. Awaiting confirmatory results for correlation.



## Next Steps

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- Complete the review/evaluation (comparison with PRGs) of the confirmation sample results and excavate further if PRGs are exceeded.
- Complete site restoration activities (including transportation and disposal of excavated material and removal of site erosion controls).
- Complete post-excavation groundwater and sediment monitoring.
- Prepare and submit the project completion report.

