

2016 ANNUAL GROUNDWATER REPORT



Prepared For

**Camp Stanley Storage Activity
Boerne, Texas**

Prepared By
PARSONS

Austin, Texas

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EXECUTIVE SUMMARY

This report provides an evaluation of results from groundwater monitoring conducted in 2016 at Camp Stanley Storage Activity (CSSA). Groundwater monitoring was performed on-post and off-post during the months of March, June, September, and December 2016. The CSSA groundwater monitoring program objectives are to determine groundwater flow direction and elevations, determine groundwater contaminant concentrations for characterization purposes, and identify meteorological and seasonal variations in physical and chemical properties. This report describes the physical and chemical characteristics of the groundwater monitoring results and changes occurring to the program during 2016.

- After enduring one of the most severe droughts in Central Texas history in 2011, followed by average to below average rainfall from 2012 to 2014, then record rainfall in 2015, the Middle Trinity aquifer started 2016 in a saturated state. In 2016, rainfall total measured at CSSA was 45.76 inches from the AOC-65 Weather Station (WS). This total was approximately 9.12 inches above the 30-year average of 36.64 inches for the Boerne weather station monitored by the National Weather Service (NWS). During the same timeframe, 43.92 inches of rain fell at the San Antonio International Airport.
- From March to June 2016, the average water level in the underlying aquifer increased 106.82 feet in response to 19.7 inches of rainfall during that timeframe. The aquifer levels receded between June and September 2016, which received 15.57 inches of rainfall for the 3-month period. A total of 6.92 inches fell during the remainder of the year, with 4.32 inches coming in December. That end-of-year precipitation resulted in a 32.05-foot increase in the average aquifer elevation. CSSA received above average annual precipitation in 2016; the Middle Trinity aquifer sustained a net gain of 4.49 feet in the average aquifer elevation beneath CSSA, and rebounded more than 73 feet above its 13-year average (2003 through 2016).
- Both on- and off-post groundwater samples were collected quarterly in 2016 (March, June, September, and December) in accordance with the approved CSSA Long-Term Monitoring Optimization (LTMO) program. This plan was updated in 2015 along with the project DQO's and approved by the TCEQ and EPA in May and April of 2016. The updated sampling schedule was implemented in September 2016 with most wells scheduled for sampling on a quarterly, 15-month, or 30-month interval. Results from March, June, and September 2016 have been reported in previous quarterly reports. December 2016 data is presented in this annual report.
- In 2016, a total of 55 samples were collected from 34 on-post wells. Contaminant concentrations above drinking water standards were detected at 4 on-post wells. Wells (CS-D, CS-MW1-LGR, CS-MW5-LGR, and CS-MW36-LGR) exceeded drinking water standards for volatile organic compounds (VOCs). No wells exceeded drinking water standards for metals in 2016.

- A total of 66 samples were collected from 37 Westbay zones in 2016. VOC concentrations above drinking water standards were detected in a total of 15 zones at all four Westbay locations.
- In 2016, a total of 52 samples were collected from 20 off-post wells and 6 granular activated carbon (GAC) wellhead treatment locations. VOC concentrations above drinking water standards were detected at two off-post wells (OFR-3 and RFR-10). OFR-3 and RFR-10 had GAC units installed at the wellheads in 2002 and 2001 respectively. These GAC filtration units remove VOC contamination prior to use. One post-GAC sample from RFR-10 broke the MCL in March 2016. This unit was immediately taken offline and the carbon canisters were replaced. Additional samples were collected to ensure the unit was working properly before it was placed back into service. Samples collected after the treatment system at OFR-3 (post-GAC samples) continue to show that all VOC are being removed from the well, and the treatment is effective. Off-post wells were not sampled for metals content as part of the groundwater program.

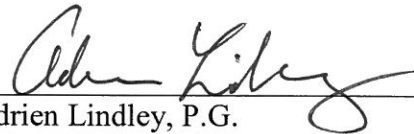
GEOSCIENTIST CERTIFICATION

2016 Annual Groundwater Monitoring Report

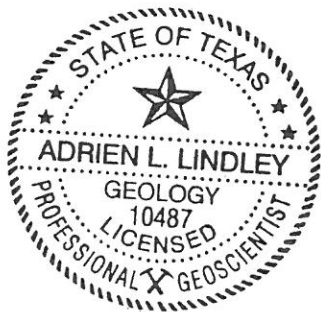
For

**Department of the Army
Camp Stanley Storage Activity
Boerne, Texas**

I, Adrien Lindley, P.G., hereby certify that the 2016 Annual Groundwater Monitoring Report for the Camp Stanley Storage Activity installation in Boerne, Texas accurately represents the site conditions of the subject area. This certification is limited only to geoscientific products contained in the subject report and is made on the basis of written and oral information provided by the Camp Stanley Storage Activity Environmental Office, laboratory data provided by APPL, and field data obtained during groundwater monitoring conducted at the site in 2016, and is true and accurate to the best of my knowledge and belief.



Adrien Lindley, P.G.
State of Texas
Geology License No. 10487



5-22-17

Date

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ACRONYMS AND ABBREVIATIONS

µg/L	Microgram Per Liter
1,1-DCE	1,1-Dichloroethene
§3008(h) Order	RCRA 3008(h) Administrative Order on Consent
AL	Action Level
AOC	Area of Concern
APPL	Agriculture and Priority Pollutants Laboratories, Inc.
BS	Bexar Shale
CC	Cow Creek
<i>cis</i> -1,2-DCE	<i>cis</i> -1,2-Dichloroethene
COC	Contaminants Of Concern
CSSA	Camp Stanley Storage Activity
DCP	Drought Contingency Plan
DQO	Data Quality Objectives
DVR	Data Validation Report
EXW	Extraction Well
GAC	Granular Activated Carbon
GPM	Gallons Per Minute
ISCO	In-Situ Chemical Oxidation
KSAT	San Antonio International Airport
LGR	Lower Glen Rose
LTMO	Long Term Monitoring Optimization
MCL	Maximum Contaminant Level
MDL	Method Detection Limit
MSL	Mean Sea Level
NCDC	National Climatic Data Center
NWS	National Weather Service
PCE	Tetrachloroethene
Plan	CSSA Off-Post Monitoring Program and Response Plan
QAPP	Quality Assurance Program Plan
RCRA	Resource Conservation and Recovery Act
RL	Reporting Limit
SAWS	San Antonio Water System
SCADA	Supervisory Control and Data Acquisition
SS	Secondary Standard
SVOC	Semivolatile Organic Compound
SWMU	Solid Waste Management Unit
TCE	Trichloroethene
TCEQ	Texas Commission on Environmental Quality
TGRGCD	Trinity-Glen Rose Groundwater Conservation District

ACRONYMS AND ABBREVIATIONS (continued)

<i>trans</i> -1,2-DCE	<i>trans</i> -1,2-Dichloroethene
UGR	Upper Glen Rose
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound
WS	Weather Station

1.0 INTRODUCTION

This report provides an evaluation of results from groundwater monitoring conducted in 2016 at Camp Stanley Storage Activity (CSSA). Groundwater monitoring was performed on-post and off-post during the months of March, June, September, and December 2016. All wells sampled in 2016 are shown on **Figure 1.1**. This report describes the physical and chemical characteristics of the groundwater monitoring results and changes occurring to the program during 2016.

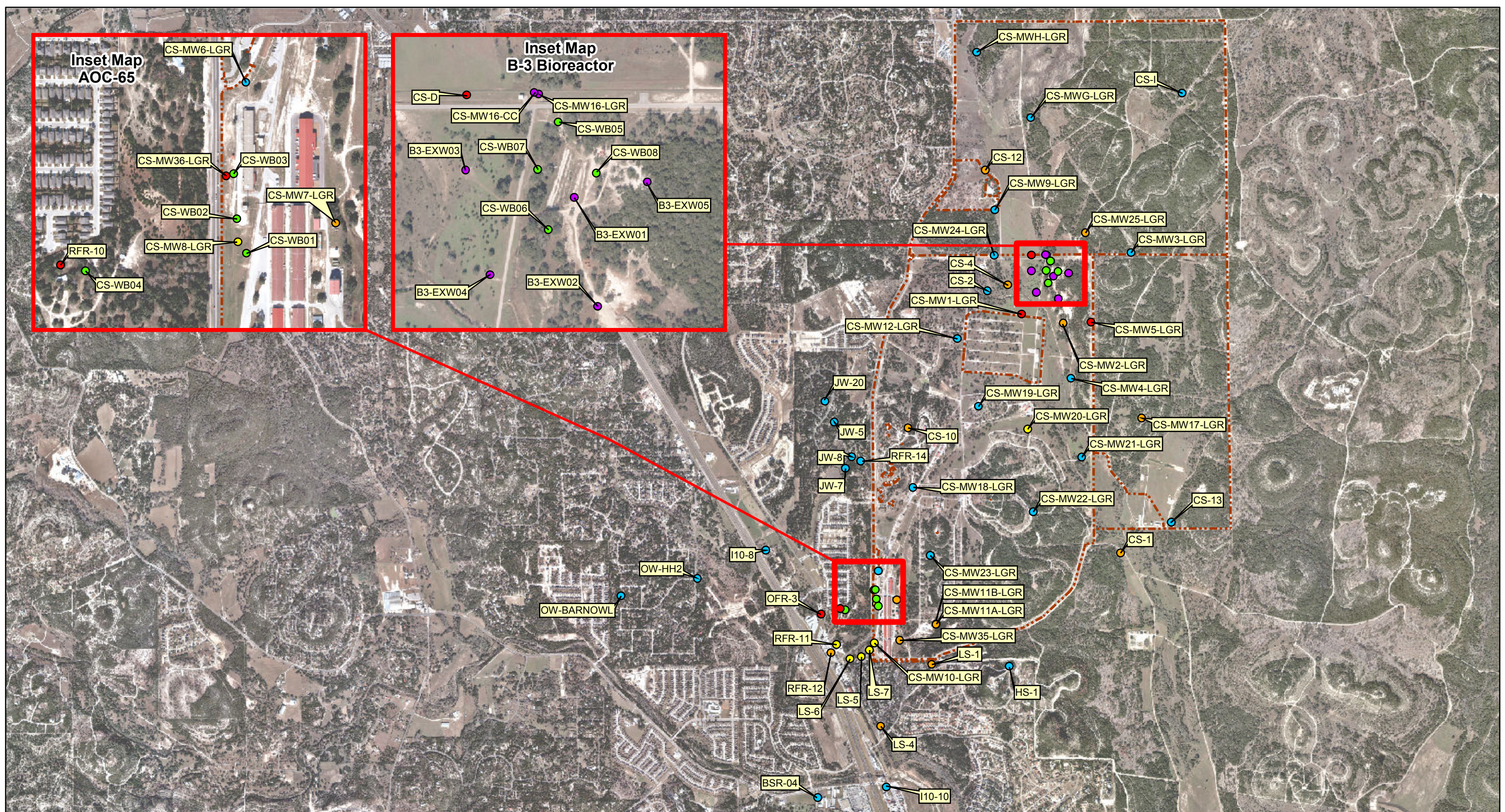
1.1 On-Post Groundwater Monitoring

The current objectives of the CSSA on-post groundwater monitoring program are to monitor groundwater flow direction trends and elevations, determine groundwater contaminant concentrations for characterization purposes, and identify meteorological and seasonal variations in physical and chemical properties of the groundwater. The objectives incorporate and comply with the Resource Conservation and Recovery Act (RCRA) §3008(h) Administrative Order on Consent (§3008(h) Order) issued by the United States Environmental Protection Agency (USEPA) on May 5, 1999.

On-post groundwater monitoring was initiated in 1992 in response to volatile organic compound (VOC) contamination detected in CSSA drinking water supply well CS-MW16-LGR and continued periodically until the current CSSA quarterly groundwater monitoring program for on-post wells was initiated in December 1999.

The CSSA groundwater monitoring program follows the provisions of the groundwater monitoring program *Final Data Quality Objectives (DQO) for the Groundwater Monitoring Program* (Parsons 2016a) in **Appendix A**, as well as the recommendations of the *Three-Tiered Long Term Monitoring Network Optimization Evaluation* (Parsons 2016b) which provided recommendations for sampling based on a long-term monitoring optimization (LTMO) study performed for the CSSA groundwater monitoring program. LTMO study sampling frequencies were initially implemented on-post in December 2005, as approved by the Texas Commission on Environmental Quality (TCEQ) and the USEPA. The LTMO evaluation was updated in 2010 using groundwater data from monitoring conducted between 2005 and 2009. It was approved by the TCEQ and USEPA and was implemented on- and off-post in June 2011 (**Appendix I**). The current versions of the LTMO and DQOs were updated with monitoring data collected between 2010 and 2014 and subsequently approved by the regulators for incorporation in the groundwater monitoring program in April and May 2016, respectively. Implementation of the latest revisions to the LTMO and DQOs began in September 2016 following approval from the USEPA and the TCEQ.

A comprehensive summary of the results from the 2016 on-post groundwater sampling events is presented in **Appendix B**. **Appendices C** and **D** present Westbay analytical results in tabular and graphical format, respectively. Abbreviated tables showing only the detected compounds are included in the groundwater results discussions in Section 2.2.1 of this report. **Appendix E** includes the potentiometric groundwater maps.



Aerial Photo Date: 2013



0 0.5 1 2 Miles

- Wells with VOC concentrations > MCL
- Wells with VOC concentrations between RL and MCL
- Wells with VOC concentrations < RL
- Non-detect
- Multiport Westbay Wells
- Other wells

MCL= maximum contaminant level
 RL= laboratory analytical reporting limit
 - - - - - Fence Line

Figure 1.1
 2016 Sampled On-Post and
 Off-Post Groundwater Wells
 Camp Stanley Storage Activity

PARSONS

Off-post results for groundwater sampling and Granular Activated Carbon (GAC) maintenance are included as **Appendices F and G**. Laboratory data packages for 2016 were submitted to CSSA in electronic format separately from this report. **Appendix H** presents the associated data validation reports (DVR) for the December 2016 analytical package submittals. The March, June, and September DVRs are included with the quarterly groundwater reports.

1.2 Off-Post Groundwater Monitoring

The primary objective of the off-post groundwater monitoring program is to determine whether concentrations of VOCs detected in off-post public and private drinking water wells exceed safe drinking water standards. In off-post groundwater, the primary contaminants of concern (COC) are tetrachloroethene (PCE) and trichloroethene (TCE). A secondary objective of the off-post groundwater monitoring program is to determine the lateral and vertical extent of the contaminant plumes associated with past releases near Area of Concern (AOC)-65 or from Solid Waste Management Units (SWMU) B-3 and O-1. A third objective of the off-post groundwater monitoring program is to assess whether there are apparent trends in contaminant levels (decreasing or increasing) over time in the sampled wells.

CSSA was required by the §3008(h) Order to identify and locate both privately and publicly owned groundwater wells within ¼-mile of CSSA. The Offsite Well Survey Report (Parsons 2001) was submitted to fulfill this requirement. This survey was updated in 2010 to capture any new wells that have been added in the area and to extend the ¼-mile to ½-mile of CSSA (Parsons 2010). In total, 97 well locations are identified in the updated 2010 Well Survey. A total of 47 locations (45 active and 2 plugged) were identified within a ¼-mile radius, and another 39 locations (33 active and 6 plugged) are believed to exist between ¼ to ½-mile away from CSSA. Finally, a total of 11 locations (10 active and 1 plugged) were identified in a special interest area beyond the ½-mile survey that is considered to be downgradient of the CSSA VOC plumes.

After the 2010 Well Survey, the USEPA requested that CSSA identify additional wells beyond the ½-mile border to the south and west of the post. As a result, CSSA identified and added five wells that follow the Boerne Stage Road corridor, ranging in distance between 0.75 and 3 miles from CSSA. In accordance with the current DQO update, wells greater than 1.5 miles from CSSA or have a 5 year non-detect history are excluded from the sampling program. Some exceptions have been made to these stipulations based on proximity to the plume.

Additional background information regarding off-post private and public water supply wells is located in the *CSSA Environmental Encyclopedia, Volume 5 Groundwater*. Some off-post wells were initially sampled in 1995 and quarterly sampling of off-post wells began in 2001 in accordance with the *Off-Post Monitoring Program and Response Plan* (CSSA 2002a) (Plan).

Under the Plan, the following criteria are used to determine the action levels for detected VOCs and to determine which off-post wells are sampled:

- If VOC contaminant levels are ≥ 90 percent of the maximum contaminant levels (MCL) based on preliminary data received from the laboratory and the well is used as a potable water source, the well will be taken offline and bottled water will be supplied within 24 hours after receipt of the data. For PCE and TCE, 90 percent of the MCL is 4.5 micrograms per liter ($\mu\text{g/L}$). A confirmation sample will be collected from the well within 14 days of receipt of the final validated analytical report. If the confirmation sample confirms COCs are at or above 90 percent of the MCLs, the well will be evaluated, and either installation of an appropriate method for wellhead treatment or connection to an alternative water source will be performed.
- If VOC contaminant levels are ≥ 80 but ≤ 90 percent of the MCL (>4.0 and <4.5 $\mu\text{g/L}$ for PCE and TCE) during any single monitoring event based on preliminary data from the laboratory, and the well is used as a potable water source, it will be monitored monthly. If the monthly follow-up sampling confirms that COCs are ≥ 80 but ≤ 90 percent of the MCL, it will continue to be sampled monthly until the VOC levels fall below the 80 percent value.
- If any COC is detected at levels greater than or equal to the analytical method detection limit (MDL) (historically 0.06 $\mu\text{g/L}$ for PCE and 0.05 $\mu\text{g/L}$ for TCE), and <80 percent of the MCL, the well will be sampled on a quarterly basis. This sampling will be conducted concurrently with on-post sampling events and will be used to develop historical trends in the area. Quarterly sampling will continue for a minimum of 1 year, after which the sampling frequency will be reviewed and may be decreased.
- If COCs are not detected during the initial sampling event (i.e., no VOC contaminant levels above the MDL), further sampling of the well will be reconsidered. A well with no detectable VOCs may be removed from the sampling list. However, if analytical data suggest future plume migration could negatively influence the well, it will be re-sampled as needed. The well owner, USEPA, and TCEQ will be apprised of any re-sampling decisions regarding the non-detect wells.
- For locations where a wellhead treatment system has been installed, post-treatment samples will be collected and analyzed after initial system start-up and at 6-month intervals to confirm the system is effectively removing VOCs.

A comprehensive summary of the results from the 2016 off-post groundwater sampling events is presented in **Appendix F**. Abbreviated tables showing only the detected compounds are included in the groundwater results discussions in Section 2.2.2 of this report. **Appendix G** summarizes pre- and post-GAC filtration system sampling results.

The cumulative historical results from both on- and off-post groundwater monitoring are presented in summary tables located in the Introduction to the *On-Post and Off-Post Quarterly Groundwater Monitoring Program* (Tables 6 through 9), *CSSA Environmental Encyclopedia, Volume 5 Groundwater*.

2.0 GROUNDWATER MONITORING RESULTS

2.1 Physical Characteristics

2.1.1 Water Level Measurements

Water level measurements were recorded prior to sampling during the March, June, September, and December 2016 events. A total of 56 water level measurements made from all monitoring wells and drinking water wells listed are in **Table 2.1**. Water levels from one off-post well (FO-20) are used to develop the northern perimeter of the gradient maps. Water levels were measured by either e-line indicator or collected from a permanently installed transducer.

Water level elevations and quarterly elevation changes are summarized in **Table 2.1**. The average groundwater elevation measurements for each of the Lower Glen Rose (LGR), Bexar Shale (BS), and Cow Creek (CC) intervals of the Middle Trinity aquifer are provided in **Table 2.2**. The averages were calculated using groundwater elevations from wells screened in only one of the three intervals. Water elevations from 5 wells completed with open boreholes over multiple formations were not used. Total precipitation recorded in 2016 was 9 inches above the average annual for the area.

CSSA operates two weather stations to monitor and record climatic conditions across the post, although the rain gauge at location B-3 WS had clogging issues and did not record a complete set of data for the year. For the purposes of this discussion, the CSSA precipitation record has been utilized from the AOC-65 WS located at the southern end of the inner cantonment. For longer term precipitation data, this report also utilizes precipitation data from the San Antonio International Airport (KSAT) because of the completeness and accuracy of the data.

The total amount of precipitation that fell in 2016 was 45.76 inches at the AOC-65 WS, which was below the measured 53.51 inches (B-3 WS) and slightly above 44.22 inches (KSAT) that fell in 2015. For the same 2016 time period, 43.92 inches of precipitation was measured at the KSAT location at the international airport. In 2015 the aquifer elevations returned to levels not seen since 2010. With another above average rainfall year, the aquifer held these elevations in 2016. According to the National Weather Service (NWS), the 30-year average (1987-2016) for the Boerne, TX weather station is 36.64 inches.

The aquifer levels fell slightly during the first quarter of 2016, which received 3.6 inches of rainfall for the 3-month period (AOC-65 WS). April recorded the highest monthly rainfall total of the year, 9.04 inches, with three daily rainfall totals greater than one inch. As a result, quarterly groundwater monitoring showed average aquifer levels increased by 106.8 feet from March to June 2016. From July through September 15.5 inches of rain fell, however, the aquifer showed a decrease in elevation due to the significant amount of rain that fell in April (9.05") and May (8.47"). This final quarter of the year started with no rainfall in October but picked up toward the end of the year with the aquifer increasing 26 feet from September to December. A total of 6.92 inches of rain fell throughout the remainder of the year (October through December).

Table 2.2
Summary of Groundwater Elevation by Formation, 2016

Well ID	TOC elevation	2016 Groundwater Elevations				Formations Screened		
		March	June	September	December	LGR	BS	CC
CS-1*	1169.27	1011.57	1058.37	1043.97	1001.67		ALL	
CS-2	1237.59	1051.01	1182.87	1061.67	1103.66	X	?	
CS-3	1240.17	1051.96	1177.81	1065.12	1104.17	X		
CS-4	1229.28	1050.25	1176.57	1064.29	1102.85	X		
CS-10*	1331.51	1047.83	1165.41	1059.61	1108.94		ALL	
CS-12*	1274.09	1048.99	1133.29	1066.19	1093.49		ALL	
CS-13	1193.26	1037.05	1135.93	1064.31	1074.85		ALL	
CS-D	1236.03	1046.07	1164.27	1060.91	1097.46	X		
CS-MWG-LGR	1328.14	1063.30	1144.41	1089.16	1110.73	X		
CS-MWH-LGR	1319.19	1006.61	1164.93	1073.70	1112.85	X		
CS-1*	1315.20	1059.33	1160.65	1082.00	1103.65	X		
CS-MW1-LGR	1220.73	1054.86	1174.00	1072.44	1103.51	X		
CS-MW1-BS	1221.09	1053.60	1109.53	1083.90	1063.82		X	
CS-MW1-CC	1221.39	1036.35	1133.61	1064.94	1085.05			X
CS-MW2-LGR	1237.08	1056.08	1162.87	1083.08	1099.06	X		
CS-MW2-CC	1240.11	1030.81	1111.49	1067.58	1067.35			X
CS-MW3-LGR	1334.14	1051.94	1152.82	1076.38	1096.12	X		
CS-MW4-LGR	1209.71	1128.65	1182.31	1139.05	1158.43	X		
CS-MW5-LGR	1340.24	1053.91	1155.09	1083.16	1095.60	X		
CS-MW6-LGR	1232.25	1047.29	1160.80	1077.70	1110.94	X		
CS-MW6-BS	1232.67	1069.95	1148.45	1110.61	1085.55		X	
CS-MW6-CC	1233.21	1065.41	1150.30	1080.96	1095.01			X
CS-MW7-LGR	1202.27	1055.09	1160.36	1069.33	1104.62	X		
CS-MW7-CC	1201.84	1047.58	1150.16	1075.30	1096.45			X
CS-MW8-LGR	1208.35	1063.12	1157.89	1075.93	1109.05	X		
CS-MW8-CC	1206.13	1048.09	1150.10	1076.65	1096.29			X
CS-MW9-LGR	1257.27	1053.42	1174.68	1066.49	1106.13	X		
CS-MW9-BS	1256.73	1046.47	1173.87	1085.19	1097.68		X	
CS-MW9-CC	1255.95	1044.53	1150.44	1066.74	1095.65			X
CS-MW10-LGR	1189.53	1051.03	1147.18	1067.52	1102.22	X		
CS-MW10-CC	1190.04	1046.51	1147.99	1060.16	1098.88			X
CS-MW11A-LGR	1204.03	1031.64	1153.55	1048.94	1089.03	X		
CS-MW11B-LGR	1203.52	1015.68	1151.12	1050.81	1094.94	X		
CS-MW12-LGR	1259.07	1057.12	1177.64	1070.64	1108.94	X		
CS-MW12-BS	1258.37	1051.77	1156.86	1096.09	1076.92		X	
CS-MW12-CC	1257.31	1045.08	1150.46	1070.47	1095.78			X
CS-MW16-LGR*	1244.60	1045.65	1113.38	1027.82	1094.04	X		
CS-MW16-CC*	1244.51	1032.68	1128.14	983.28	1083.06			X
B3-EXW01*	1245.26	1041.59	1151.56	943.79	942.79	X		
B3-EXW02*	1249.66	955.76	1158.33	1074.24	1092.43	X		
B3-EXW03*	1235.11	1018.39	1182.28	1066.37	1103.31	X		
B3-EXW04*	1228.46	951.17	1184.27	1026.05	1096.96	X		
B3-EXW05*	1279.46	981.58	1040.97	1070.12	1087.53	X		
CS-MW17-LGR	1257.01	1056.06	1164.46	1070.20	1099.97	X		
CS-MW18-LGR	1283.61	1055.7	1168.56	1071.39	1109.48	X		
CS-MW19-LGR	1255.53	1071.8	1177.32	1086.00	1118.98	X		
CS-MW20-LGR	1209.42	1078.01	1176.53	1093.31	1122.86	X		
CS-MW21-LGR	1184.53	1057.90	1179.32	1072.09	1100.03	X		
CS-MW22-LGR	1280.49	1051.49	1173.63	1067.18	1100.93	X		
CS-MW23-LGR	1258.20	1044.85	1164.78	1061.56	1099.68	X		
CS-MW24-LGR	1253.90	1050.82	1178.67	1062.85	1103.03	X		
CS-MW25-LGR	1293.01	1053.01	1158.64	1073.00	1099.58	X		
CS-MW35-LGR	1186.97	1047.64	1149.23	1064.16	1098.25	X		
CS-MW36-LGR	1218.74	1063.88	1158.75	1077.23	1109.85	X		
FO-20	1327.00	1082.72	1177.94	1082.30	1114.35		ALL	
Average groundwater elevation by formation, each event:	LGR:	1054.01	1165.70	1073.18	1105.84	Average groundwater elevation by formation all of 2016:		1099.68
	BS:	1055.45	1147.18	1093.95	1080.99			1094.39
	CC:	1045.55	1143.07	1070.35	1091.31			1087.57

Notes:

Bold wells: CS-2, CS-10, CS-12, CS-13, and FO-20 are open boreholes across more than one formational unit.

? = Exact screening information unknown for this well.

Shaded wells are routinely pumped for either domestic, livestock, or environmental remediation purposes, and therefore are not used in calculating statistics.

CS-1, CS-10, CS-12, and CS-13 are current or future drinking water wells.

CS-MW16-LGR, CS-MW16-CC, B3-EXW01 through B3-EXW05 pumps are cycling continuously to feed the B-3 Bioreactor.

* = submersible pump running at time of water level measurement.

Formational average groundwater elevation is calculated from non-pumping wells screened in only one formation.

All measurements given in feet.

NA = Data not available

Through all the hydrologic cycles of 2016, the overall groundwater levels in the Middle Trinity aquifer increased 4.49 feet from January through December 2016, as shown in **Table 2.1**. **Figure 2.1** presents a 14-year history of the quarterly groundwater elevation measurements in the LGR segment of the aquifer in relation to quarterly and annual precipitation measured at the KSAT weather station.

Based on 2016 quarterly aquifer level measurements, **Figure 2.2** shows the relationships of the water level in each portion of the aquifer at CSSA cluster wells (CS-MW1, CS-MW2, CS-MW6, CS-MW7, CS-MW8, CS-MW9, CS-MW10, and CS-MW12). The general trend in **Figure 2.2** shows that at an individual location, the head in the LGR well is typically greater than in the CC well. The amount of dissimilarity between water levels within a cluster is a good indicator of the degree of hydraulic separation between the formational units. Theoretically, intervals that are well connected hydraulically will have the same or very similar groundwater elevation. As typical in prior years, the well clusters in the southern portion of the post (CS-MW6, CS-MW7, CS-MW8, and CS-MW10) show less hydraulic head separation between the LGR and CC production zones than cluster wells to the north (CS-MW1, CS-MW2, CS-MW9, and CS-MW12).

Under more favorable hydrologic conditions, the groundwater elevation in the BS typically falls between the LGR and CC elevations; this was not evident in 2016. As seen in **Figure 2.2**, when water levels decrease as they did during the third quarter of 2016, the BS groundwater elevation is generally higher than both of its counterparts. This phenomenon has been observed before in the cluster wells, and is attributed to the low draining potential of the less permeable BS matrix during continual aquifer declines. Conversely, during recharge events, the groundwater in the BS wells will lag behind the LGR and CC wells. This is depicted in the second and fourth quarters of 2016 and seems to be typical for the area.

2.1.2 Weather Station and Transducer Data

Of the 56 wells listed on **Table 2.1**, 16 are equipped with transducers to continuously log groundwater levels and 10 are providing telemetry directly to the Supervisory Control and Data Acquisition (SCADA) system. As previously noted, two weather stations are in place at CSSA, B-3 WS is located next to the B3-EXW01 well in the north-central region of CSSA, and AOC-65 WS in the southwest corner of CSSA at AOC-65. Both weather stations record meteorological data, including precipitation, wind speed, wind direction, temperature, etc. The data are recorded to evaluate whether trends in rainfall and groundwater recharge. However, for the purposes of this report the data from the AOC-65 WS is used because it has the highest degree of accuracy and reliability.

Figure 2.1 - Average LGR Groundwater Elevations and Quarterly/Annual Precipitation

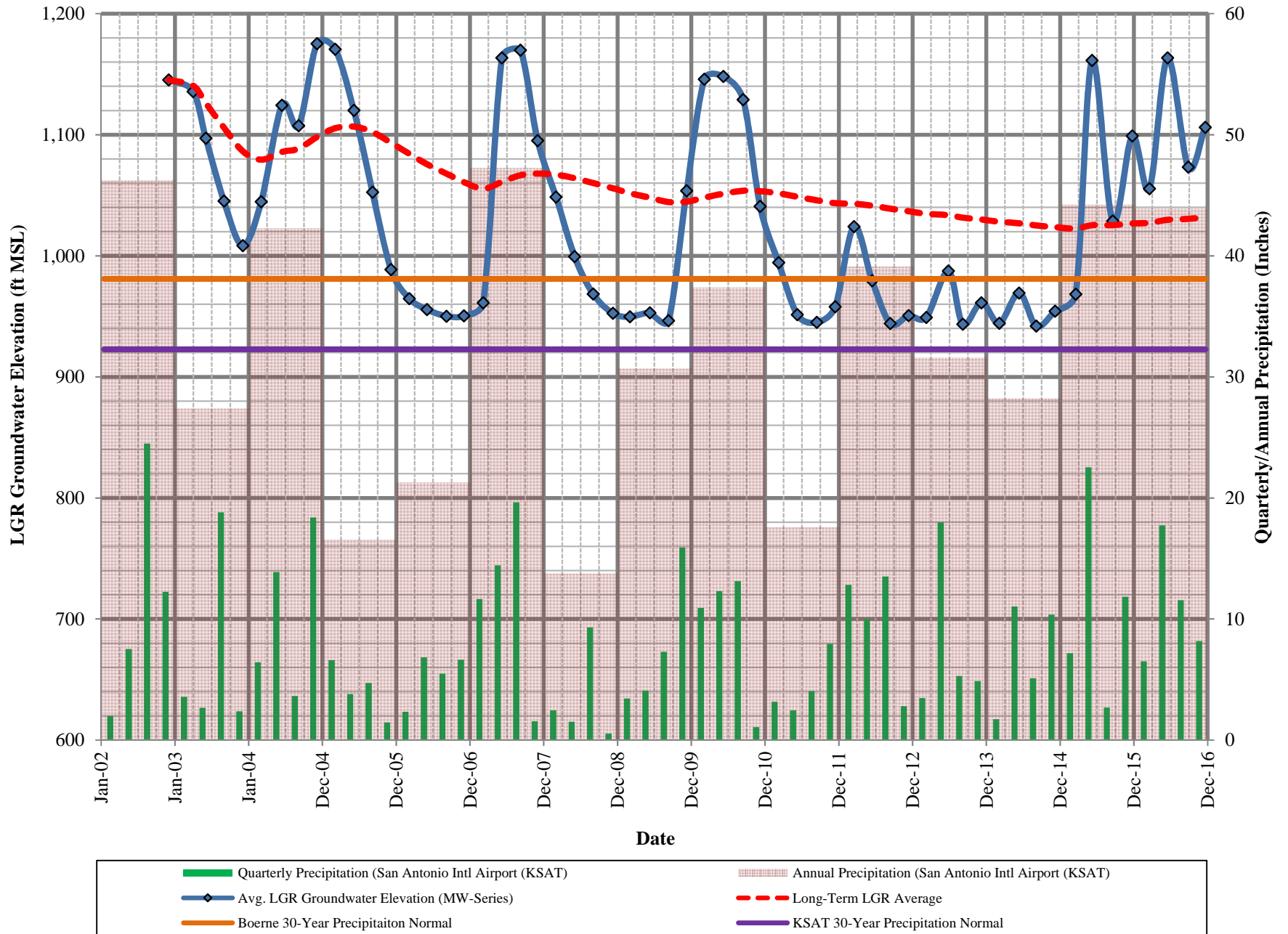
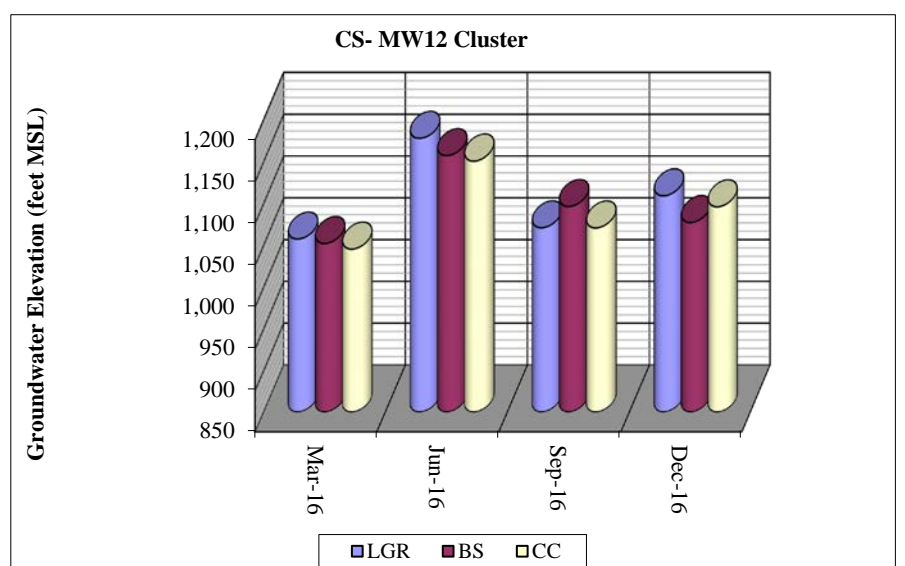
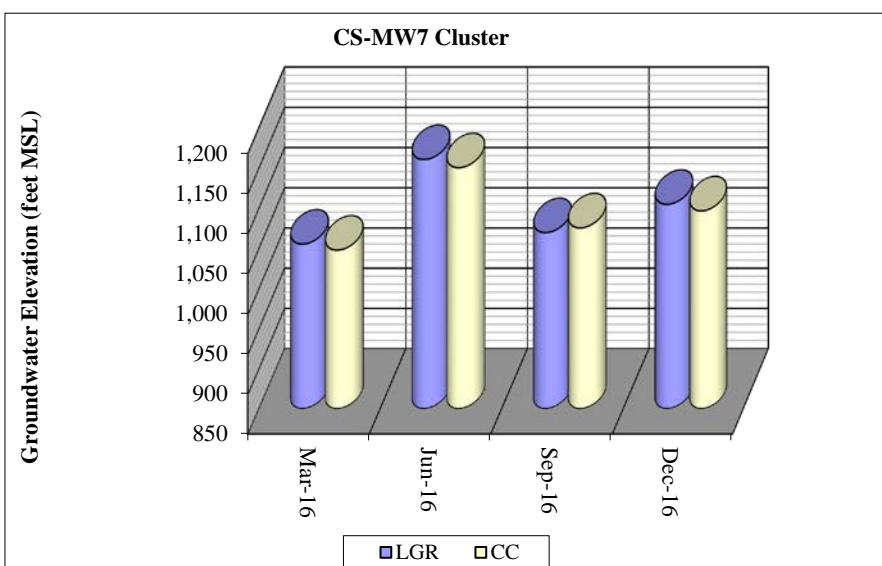
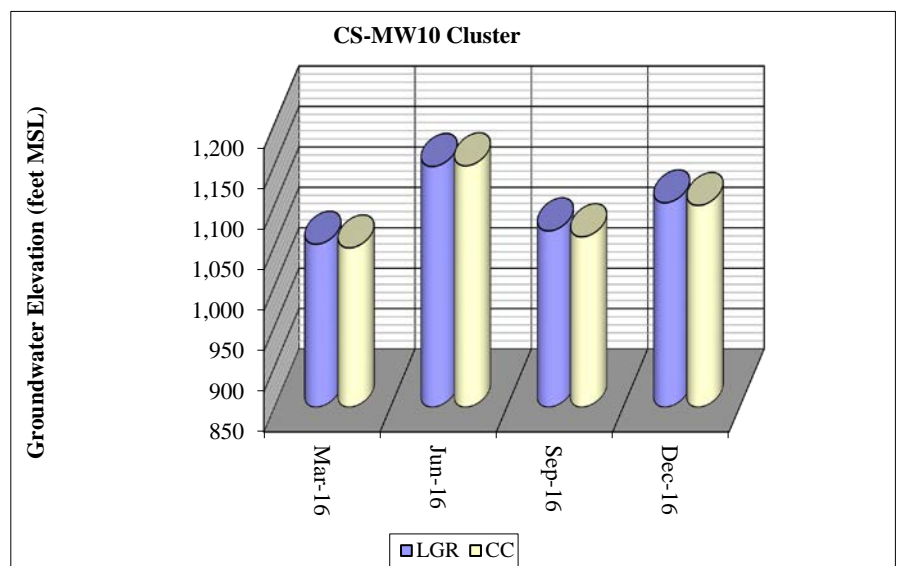
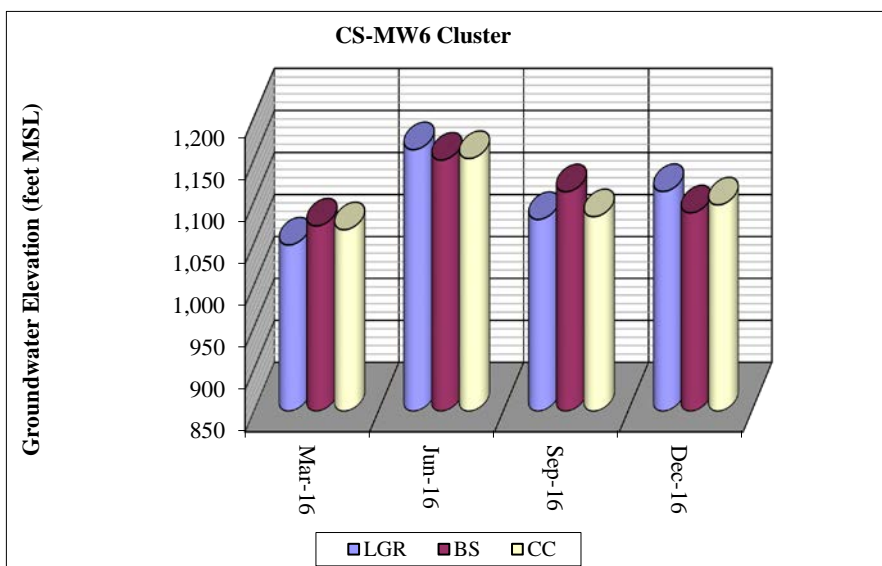
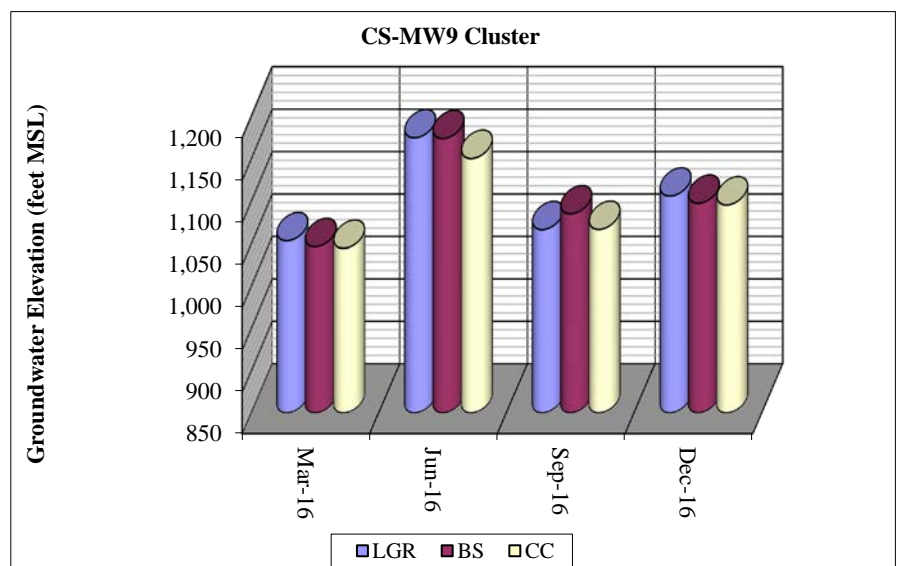
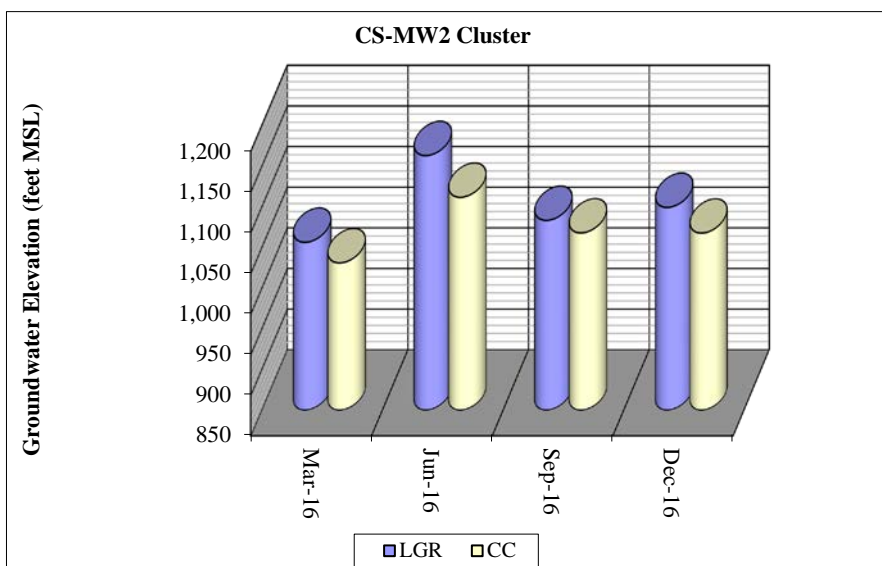
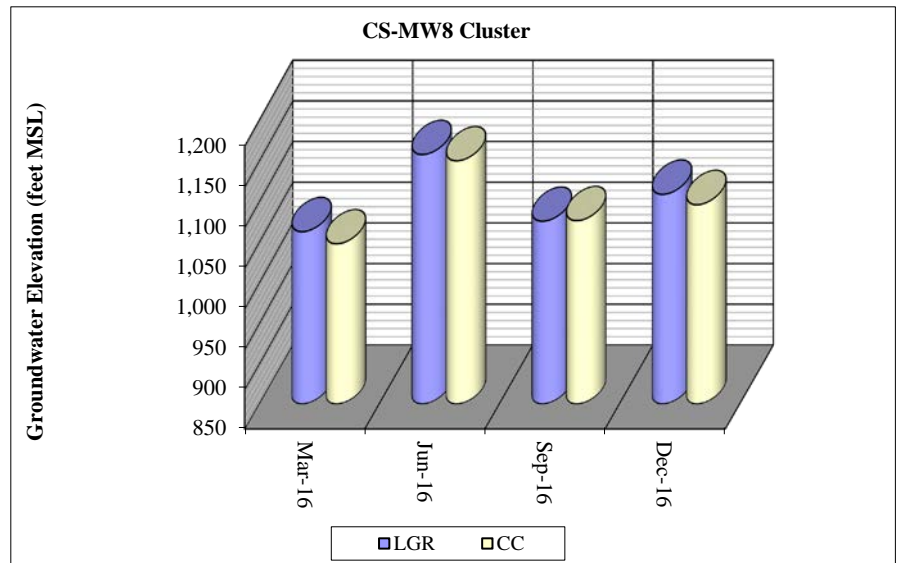
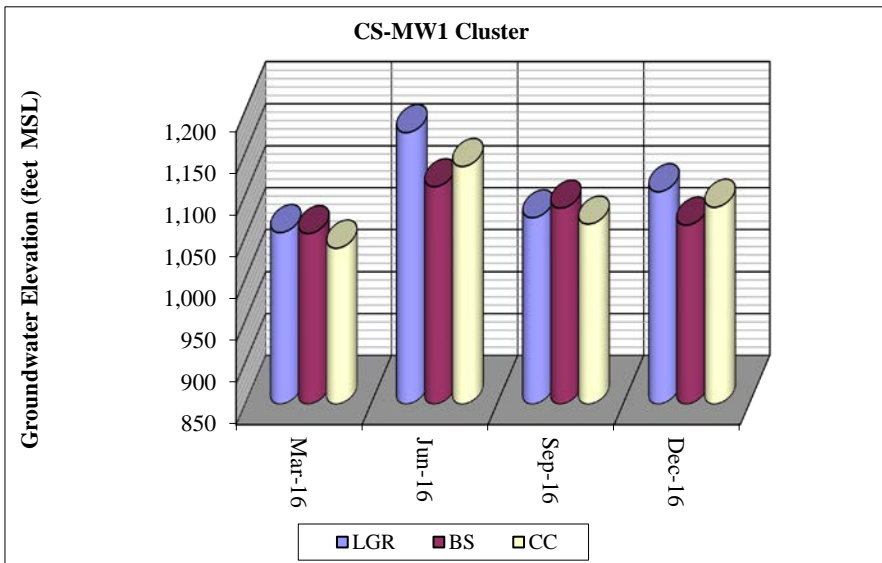


Figure 2.2
Comparison of Groundwater Elevations within Well Clusters



Continuous aquifer level data (January 1st through December 31st, 2016) collected from four wells screened within the LGR, and two wells screened within the CC are presented on **Figure 2.3** as well as the corresponding daily precipitation values. The wells presented in this figure are equipped with transducers set to record continuous water level measurements. Both CS-MW16-LGR and CS-MW16-CC are omitted from this graphic since they are actively pumping wells for the Bioreactor system, and therefore do not reflect static aquifer conditions. The active drinking water wells and the B3-EXW extraction wells were also omitted for the same reason. As in the past, the groundwater elevations indicate recharge of the LGR formation immediately after precipitation.

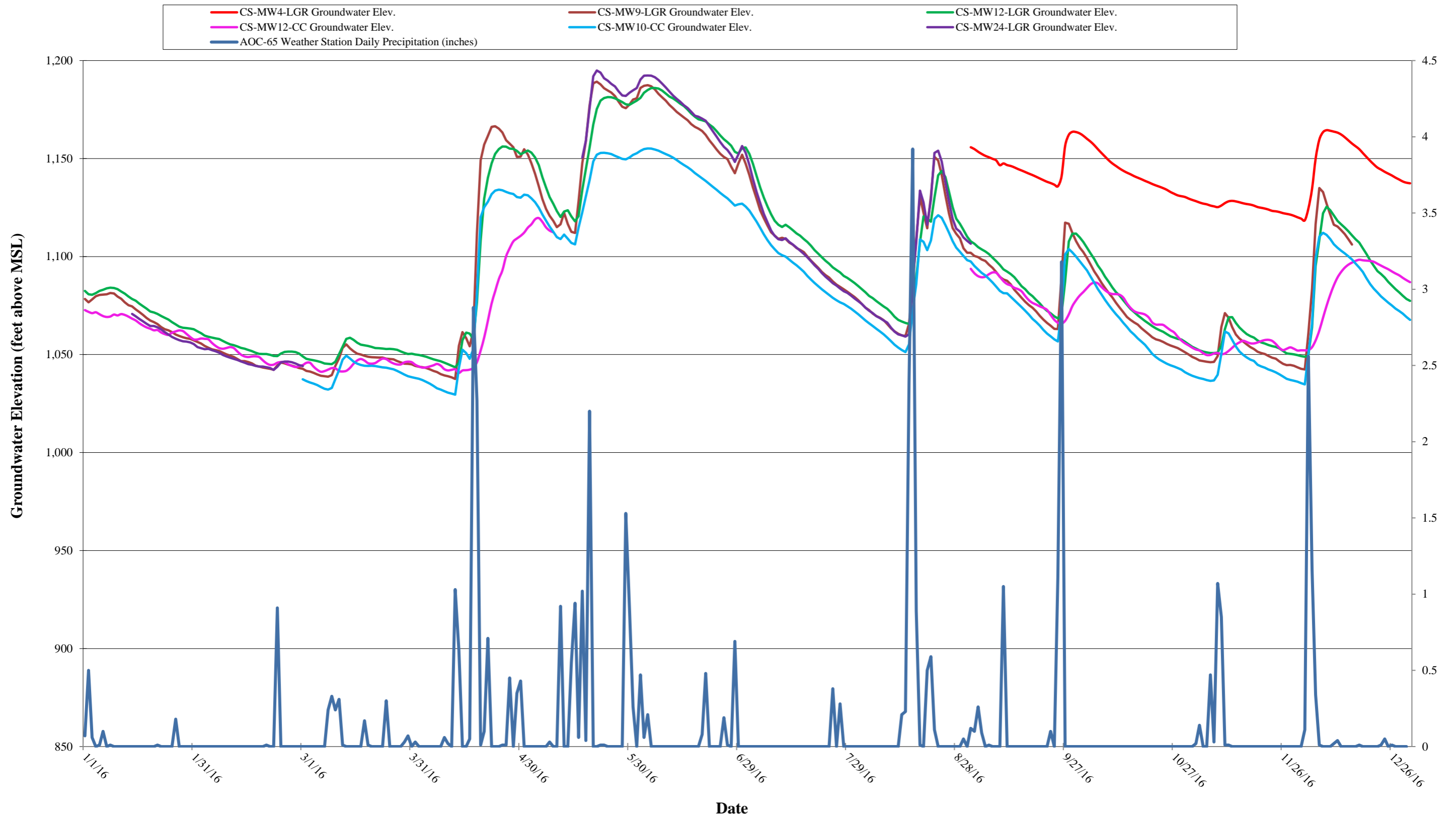
CSSA AOC-65 WS reported 97 rainfall events with a total precipitation of 45.76 inches. The rainfall in 2016 started off below average in January and February then picked up in March. The rainfall peaked in April with 9.04 inches of rainfall, well above the 5.08 monthly average. The month of May had a rainfall total of 8.47 inches. The rain tapered off in June and July with a total rainfall recorded for those 2 months of 2.85 inches. August and September also recorded above average rainfall of 8.89 and 6.02 inches respectively. No rainfall was recorded during the month of October at the AOC-65 WS. November recorded average rainfall and December reported above average rain with 4.32 inches. April and August reported the highest monthly rainfall amounts and October had the lowest rainfall total recorded. During the same timeframe, 43.92 inches of rainfall was measured at the San Antonio International Airport, and 39.70 inches of rainfall was measured in Boerne, TX.

Based upon 30-year precipitation data (1987-2016), 2016 rainfall totals at CSSA ended about 9.12 inches above the Boerne NWS weather station average of 36.64 inches. For the same timeframe, the San Antonio NWS weather station reports a 30-year average of 32.58, which was 13.18 inches below the CSSA AOC-65 WS. Currently the San Antonio Water System (SAWS) is in the ‘year-round conservation’ stage and the Trinity Glen Rose Groundwater Conservation District (TGRGCD) is in ‘Stage 1’ water restrictions.

Table 2.3 shows the total precipitation received each quarter, average groundwater elevations in each formation, the average groundwater elevation change in each formation, the approximate gradient, and approximate gradient flow direction for all monitoring events.

Referring back to **Figure 2.1**, the latter half of 2009 marked the end of a drought cycle that had begun at the end of 2006. Major precipitation events in August and September 2009 recharged the aquifer and began a trend that continued through May 2010. The aquifer surge experienced in the first five months was negated by a summer dry period through August 2010. Rainfall amounts declined September 2010 through September 2011, resulting in regional aquifer level decline of approximately 195 feet. There was an increase in rainfall late in 2011 but due to the already depressed aquifer the drought conditions persisted into 2012. Although an average amount of rain fell in 2012 and 2013, the aquifer rebound was minimal. The below average rainfall in 2014 allowed the aquifer to drop an additional 5 feet over the 12-month period. In 2015 above average rainfall allowed the aquifer to recover 140 feet, bringing the San Antonio area out of the severe drought that began in late 2010. With above average rainfall recorded again in 2016 the aquifer level continued to climb an additional 4.5 feet.

Figure 2.3, Selected Wells Groundwater Elevations vs Precipitation Data



**Table 2.3
Precipitation, Groundwater Elevation and Gradient**

Quarterly Report (Month, year)	Total Quarterly precipitation (inches) B-3 WS	Total Quarterly precipitation (inches) AOC-65 WS	Average GW elevation Change (feet)	CS-MW18-LGR GW Elevation Change (feet)	Average GW Elevation			Approximate gradient (ft/ft)	Approximate gradient flow direction
					Lower Glen Rose	Bexar Shale	Cow Creek		
September-99	7.52	--	-188.4	--	979.80	--	--	0.007	Southwest
December-99	2.84	--	-4.9	--	973.10	--	--	0.004	Southwest
March-00	3.58	--	-9.3	--	970.94	--	--	0.009	South-southeast
June-00	11.1	--	11.77	--	976.27	--	--	0.006	Southeast
September-00	1.96	--	-6.34	--	967.03	--	--	0.006	Southeast
December-00	14.48	--	122.99	--	1118.59	--	--	0.005	South-southeast
March-01	10.13	--	53.19	--	1157.20	--	--	0.0125	Southeast
June-01	6.58	--	-47.5	--	1104.00	1106.85	1093.89	0.007	Southeast
September-01	14.73	--	23.96	--	1140.55	1098.18	1095.75	0.0067	Southeast
December-01	10.16	--	15.46	--	1149.68	1131.36	1125.63	0.0092	Southeast
March-02	2.25	--	-70.97	--	1077.91	1064.46	1059.27	0.0086	Southeast
June-02	4.46	--	-48.29	--	1030.51	1022.51	994.02	0.0137	South-southeast
September-02	30.98	--	104.5	--	1130.87	1129.21	1098.34	0.017	South-southeast
December-02	12.91	--	19.48	-2.84	1143.98	1148.26	1133.11	0.0061	South-southeast
March-03	6.22	6.68	-8.47	-1.99	1135.18	1140.52	1122.95	0.012	South-southeast
June-03	4.67	4.64	-41.08	-40.06	1097.87	1095.36	1069.02	0.0022	South-southwest
September-03	8.05	10.28	-52.85	-54.54	1046.77	1060.39	1025.61	0.0045	South-southwest
December-03	2.79	2.92	-32.85	-40.46	1011.38	1029.39	1002.07	0.0095	South-southwest
March-04	6.35	5.93	22.89	36.7	1043.68	1026.20	1017.98	0.0046	South-southwest
June-04	12.95	12.33	71.91	88.99	1121.80	1101.85	1074.56	0.0012	South-southwest
September-04	14.3	14.57	-8.05	-21.66	1106.43	1110.17	1074.96	0.003	South-southeast
December-04	21.04	23.12	63.07	76.62	1173.98	1159.46	1135.16	0.004	South-southeast
March-05	7.38	6.48	-6.47	-7.11	1168.46	1151.60	1127.58	0.00436	South-southeast
June-05	NA	5.29	-45.93	-61.3	1119.19	1125.27	1082.40	0.0041	South-southeast
September-05	NA	5.93	-61.24	-64.87	1054.88	1077.87	1033.65	0.0068	South-southwest
December-05	NA	2.41	-57.9	-69.24	994.23	1023.45	980.25	0.0054	South-southwest
March-06	2.52	1.11	-24.81	-33.89	974.10	990.23	948.80	0.0084	South-southwest
June-06	7.65	11.18	-9.46	-1.4	966.16	983.47	933.59	0.0104	South-southwest
September-06	3.42	3.12	-6.66	-4.81	961.07	979.78	922.34	0.0099	South
December-06	4.68	5.9	2.48	3.02	958.87	979.73	933.37	0.0099	South
March-07	9.83		14.53	-1.27	969.87	992.53	958.06	0.0079	South
June-07	11.99		182.09	234.13	1162.17	1119.36	1128.32	0.0016	Southeast
September-07	29.4		15.56	0.54	1168.77	1168.14	1154.47	0.0019	South
December-07	1.95		-70.45	-87.12	1095.68	1101.19	1088.93	0.0052	South-southeast
March-08	2.17	2.31	-42.45	-43.22	1050.23	1053.76	1047.78	0.0072	South
June-08	1.9	2.69	-51.71	-52.47	1002.44	1015.93	966.67	0.0047	South
September-08	6.06	6.95	-27.49	-45.80	976.18	991.62	953.41	0.0058	South
December-08	1.69	1.74	-15.48	-5.06	961.10	981.76	934.26	0.0080	South-southeast
March-09	2.58	3.16	-4.25	-2.15	957.48	973.36	916.24	0.0073	South-southeast
June-09	3.77	4.41	1.25	1.53	959.75	971.67	914.68	0.0059	South-southeast
September-09	NA	7.41	-7.76	-5.48	953.49	967.07	903.39	0.0054	South-southeast
December-09	NA	14.63	101.24	114.02	1051.77	1040.48	1026.64	0.00002	South
March-10	9.23	NA	91.51	100.05	1144.36	1128.84	1131.78	0.00052	South-southeast
June-10	NA	10.66	3.97	3.40	1147.52	1145.30	1114.38	0.00078	South-southeast
September-10	NA	10.91	-37.77	-15.95	1126.83	1070.13	1059.82	0.00085	South-southeast
December-10	NA	4.45	-63.93	-97.99	1045.26	1060.79	1011.76	0.00029	South-southeast
March-11	NA	2.57	-41.89	-52.73	997.07	1020.56	994.18	0.00314	South-southeast
June-11	0.91	0.83	-41.80	-46.77	957.42	983.63	917.00	0.00532	South-southeast
September-11	2.29	2.13	-8.81	-3.15	952.98	970.34	900.90	0.00533	South-southeast
December-11	9.85	11.71	14.73	8.05	963.15	972.51	922.89	0.00536	South-southeast
March-12	NA	8.58	57.04	75.20	1021.21	992.83	975.99	0.00066	South-southeast
June-12	NA	5.83	-30.83	-34.76	981.01	1012.98	964.88	0.00326	South-southeast
September-12	NA	9.95	-36.51	-26.02	952.92	975.91	909.63	0.00455	South-southeast
December-12	NA	7.12	8.92	4.15	957.47	984.75	930.15	0.00550	South-southeast
March-13	4.88	4.79	-2.93	-2.05	954.43	977.59	933.99	0.00605	South-southeast
June-13	12.26	9.57	34.90	24.00	989.52	999.66	974.67	0.00350	South-southeast
September-13	5.03	3.92	-43.40	-26.95	947.00	974.20	918.61	0.00541	South-southeast
December-13	11.84	10.92	16.28	7.70	964.12	974.92	939.82	0.00506	South-southeast
March-14	0.96	1.10	-12.81	-6.03	950.62	970.44	926.47	0.00620	South-southeast
June-14	8.73	8.03	22.53	11.46	972.10	984.11	960.81	0.00513	South-southeast
September-14	6.25	5.09	-26.88	-13.86	947.85	970.50	916.54	0.00550	South-southeast
December-14	9.34	7.38	11.64	7.35	958.45	974.38	935.08	0.00544	South-southeast
March-15	7.95	5.52	14.41	4.62	971.61	986.23	955.73	0.00550	South-southeast
June-15	18.62	15.44	176.73	222.23	1162.97	1108.95	1115.04	0.00052*	South-southeast
September-15	6.76	3.66	-119.17	-147.45	1027.92	1055.29	1011.95	0.0053*	South-southeast
December-15	20.18	13.87	68.26	80.93	1100.39	1087.93	1083.84	0.00131	South-southeast

**Table 2.3
Precipitation, Groundwater Elevation and Gradient**

Quarterly Report (Month, year)	Total Quarterly precipitation (inches) B-3 WS	Total Quarterly precipitation (inches) AOC-65 WS	Average GW elevation Change (feet)	CS-MW18-LGR GW Elevation Change (feet)	Average GW Elevation			Approximate gradient (ft/ft)	Approximate gradient flow direction
					Lower Glen Rose	Bexar Shale	Cow Creek		
March-16	5.66	3.57	-43.11	-47.05	1055.33	1055.45	1045.55	0.00012*	South-southeast
June-16	NA	19.70	106.82	112.86	1166.20	1147.18	1143.07	0.00012	South-southeast
September-16	15.88	15.57	-85.26	-97.17	1073.95	1093.95	1070.35	0.00012	South-southeast
December-16	7.01	6.92	26.04	38.09	1106.23	1080.99	1091.31	0.00094	South-southeast

GW = groundwater, ft MSL = feet above mean sea level, ft/ft = feet per foot, WS = weather station

NA = Data not available due to weather station outage.

2007 precipitation data was combined to fill in data gaps due to multiple weather station outages during SCADA installation.

* alternate wells were used in calculating gradient to generally describe the regional gradient

2.1.3 Potentiometric Data

The groundwater gradient/potentiometric surface figures presented in **Appendix E** incorporate measured groundwater elevations from the LGR, BS, and CC screened wells. The drought conditions which began in late 2010 persisted in 2011 and 2012, showed minor improvement in 2013, back on a downward trend in 2014, then a significant recovery in 2015. The 2011 record low yearly rainfall total of 17 inches sent Bexar County and surrounding areas into one of the worst droughts in Texas history. An above average amount of rain fell in 2015 and allowed the aquifers to recover to normal conditions. The above average precipitation continued through 2016 resulting in above average aquifer water levels. As shown in **Appendix E**, water levels at CSSA can vary greatly. This variability is associated with several factors:

- A low storage capacity for groundwater within the primary porosity (interstitial voids between grains) of the limestone matrix, which is inherent to carbonate mudstone aquifers. These aquifers with lower storage capacities are more susceptible to widely fluctuating groundwater levels (as compared to a well-sorted sand matrix). Within the Middle Trinity aquifer and other regional carbonate aquifers, their groundwater yield is mostly derived from secondary porosity features resulting from faults, fractures, and chemical dissolution of the bedrock (karst).
- Differences in well completion depths and formations screened;
- Differences in recharge rates due to increased secondary porosity associated with the Salado Creek area;
- Differences in recharge rates due to increased secondary porosity associated with local fault zones;
- Pumping from on- and off-post public and private water supply wells; and
- Locations of major faults or fractures.

2.1.4 Post-wide Flow Direction and Gradient

An overall average 2016 calculated LGR groundwater gradient is to the south-southeast at 0.000325 ft/ft. Depending which quadrant of the post the measurement is taken, the groundwater gradient varied from 0.00012 ft/ft (March through September 2016) to 0.00094 ft/ft (December 2016). General groundwater flow directions and average gradients calculated during past monitoring events are provided in **Table 2.3** for comparison.

Lower Glen Rose

The 2016 potentiometric surface maps for LGR-screened wells (**Appendices E.1, E.4, E.7** and **E.10**) exhibited a wide range of groundwater elevations. To illustrate, the average groundwater elevation in the LGR segment of the aquifer varied by more than 100 feet over the course of the year. In fact, those ranges occurred within the first six months of the year. Groundwater elevations are generally higher in the northern and central portions of CSSA, and decrease to the south. This is consistent with the natural dip of the formations and the greater fault displacement in the southern portion of CSSA. The removal of well CS-G from the gridding process negates a mounding effect due to perched groundwater that is present at that well, and misleadingly disrupts the normal southerly and easterly components of the

North Pasture. This well, along with open borehole completions in wells CS-D, CS-2, and CS-4 are not fully penetrating into the LGR, and therefore are not considered within this map.

Between the December 2015 and March 2016 monitoring events, the LGR groundwater regionally decreased 45 feet as water levels receded following a wetter than normal fourth quarter in 2015. As shown in **Table 2.1**, LGR groundwater levels rebounded by an average of 111 feet in response to approximately 19.7 inches of rainfall occurring between April and June 2016, with most of that coming from multiple rain events in April and May 2016. The effect to the aquifer elevation can be seen by comparing the March 2015 (**Appendix E.1**) and June 2015 (**Appendix E.4**). By September 2016 (**Appendix E.7**), the LGR segment had lost most of its springtime gains, and the aquifer receded nearly 92 feet despite significant rain events in August and late September contributing to the 15.57 inches of rainfall during the third quarter of 2016. Another 6.92 inches of rainfall in the final quarter of 2016 garnered another 32-foot aquifer gain by the December 2015 monitoring event (**Appendix F.10**). Overall, the LGR segment gained approximately 5.5 feet of aquifer elevation over the 12-month period between December 2015 and December 2016.

A typical feature as seen in **Appendix E.1, E.4, F.7, and E.10** is the groundwater mounding effect centered on CS-MW4-LGR in the central portion of the base. This is a typical feature during non-drought conditions when the surrounding groundwater elevation is above approximately 970 feet mean sea level (MSL). Unlike the general trend at CSSA, groundwater flow appears to radiate outward from CS-MW4-LGR. Presumably this region has a strong hydraulic connection to significant perched water either associated with Salado Creek or the hillsides to the east.

Historical data has shown that this mounding effect can either be muted or completely removed under distressed aquifer levels. Although this was not the case in 2016, more recent occurrences did happen in March and September 2014 (**2014 Annual Groundwater Report - Appendices E.1 and E.7**); this mounding effect subsides as the average groundwater elevation approaches the elevation of the basal production zone of the aquifer.

The groundwater drawdown due to the cyclic pumping of CS-MW16-LGR, B3-EXW01-LGR, B3-EXW02-LGR, B3-EXW03-LGR, B3-EXW04-LGR, B3-EXW05-LGR (Bioreactor System) is a recurring feature in the central portion of the post (**Appendices E.1, E.4, E.7, and E.10**). As seen in these figures, the resultant groundwater “cone of depression” can vary due to combination of extraction wells actively pumping during the water level gauging effort. But as a collective system, they are effective in maintaining a zone of capture around the remediation system and re-injecting groundwater into the Bioreactor.

Depending on the current pumping rates at the time of measurement, groundwater in the vicinity of the Bioreactor may be depressed by as much as 50 to 150 feet, as measured between a currently active extraction well (EXW) and other surrounding wells (**Appendix E.4**). Groundwater in the inner cantonment also shows a drawdown effect from the pumping of water supply well CS-12 and is most notable in June and December 2016 (**Appendix E.4 and E.10**).

Bexar Shale

Currently, groundwater head information is limited to four data points (CS-MW1-BS, CS-MW6-BS, CS-MW9-BS, and CS-MW12-BS). Given the paucity of well control, at best, the BS groundwater maps should be considered qualitative. The BS appears to have very limited groundwater that is likely associated with fracturing. Fractured bedrock such as this often results in discordant water levels between neighboring points and may not be a true indicator of flow direction. The appropriateness of preparing potentiometric surface maps for the BS is debatable, but these maps have been generated for completeness. Potentiometric maps for the Bexar Shale in 2016 are presented in **Appendices E.2, E.5, E.8 and E.11**.

Compared to the LGR and CC segments, the BS aquitard fluctuates significantly less in response to both recharge and drought. During the four monitoring periods in 2016, the quarterly water elevation change was between 40 and 80 percent of that measured in the LGR segment. During a year with above average precipitation, the BS segment had a net loss of 6.9 feet between December 2015 and December 2016. Conversely, over the course of 12 months of drought-busting precipitation between December 2014 and December 2015, the net gain for the BS segment was 113.6 feet. Historical data has shown for a given precipitation event, the BS water level will “peak” anywhere between 15 and 30 days after the LGR and CC has already crested for the same rain event.

From a historical perspective, the potentiometric surface maps for BS-screened wells often exhibit groundwater flow in multiple directions (**Appendix E.5 and E.11**). Historically, these flow directions are to the south, east, and occasionally to the north. In 2016, the gradient of the BS potentiometric exhibit some of this variability in flow direction with mostly northerly and easterly flow directions observed during various quarterly events. As water levels in the BS segment began to drop from December 2015 to March 2016, flow was predominantly to the north. Following significant recharge events between March and June, flow was mostly to the east with a slight southeastern component. Declines in water levels from June to September indicated a northeastern flow, and as the water levels continued to decline through December, flow transitioned to the east. After the 12 month period between December 2015 and December 2016, the BS segment indicated a net loss of almost 7 feet.

Cow Creek

As with the BS, the post wide monitoring of the CC groundwater is limited due to the small number of wells completed only in the CC. Four of the nine CC wells are concentrated in the vicinity of AOC-65. In March, during its lowest groundwater elevation of the year, the CC groundwater exhibited a slightly east-northeast gradient (**Appendix E.3**). But when groundwater was at its highest elevations in June and December 2016 (**Appendices E.6 and F.12**), the predominant gradient was more strongly to the east. The September 2016 potentiometric map shows the induced gradient created as a result of routine pumping action at well CS-MW16-CC (**Appendix E.9**).

The effects of continuous pumping of CS-MW16-CC influence groundwater gradients significantly in the CC interval near the Bioreactor. Prior studies have shown measurable pumping influence within the CC at distances of more than 2,000 feet from a CC pumping well, as measured at CS-MW1-CC. The effects of this pumping are visible in the September

2016 potentiometric map (**Appendix E.9**) which clearly shows the cone of depression surrounding CS-MW16-CC.

The CC responds almost as quickly as the LGR to a recharge event, presumably because of direct infiltration on the outcrop areas to the north of CSSA. However, the recharge rate is somewhat slower than the LGR, and the crest of a precipitation response may come 15 days later than what is observed in the LGR. Typically, the CC aquifer elevation response to recharge is less than the LGR segment. After the 12 month period between December 2015 and December 2016, the net gain of the CC segment was 7.47 feet.

2.2 Chemical Characteristics

2.2.1 On-Post Analytical Results

The LTMO study implemented in December 2005, updated in 2010 and 2015, determines the frequency that on-post wells are sampled. An overview of sampling frequencies for on-post wells is given in **Table 2.4**. Forty-five on-post samples from 31 wells were scheduled to be collected in 2016 (5 in March, 5 in June, 31 in September, and 4 in December). Well CS-MW5-LGR was added to the March, June, and December sampling events to further evaluate increasing PCE and TCE levels in this well. Five additional samples were collected in February 2016 to verify unusual results from December 2015 sampling event.

The wells were sampled using either dedicated low-flow pumps, high capacity submersible pumps, or dedicated solar-powered submersible pump (well CS-I). Samples were collected after field parameters (pH, temperature, conductivity) stabilized during well purging. Field parameters were recorded in the field logbook for each sampling event.

Groundwater samples were submitted to Agriculture & Priority Pollutants Laboratories, Inc. (APPL) of Clovis, California for analysis. The analytical program for on-post monitoring wells includes short-list VOC analysis and metals. The short list of VOC analytes included: 1,1-Dichloroethene (1,1-DCE), *cis*-1,2-Dichloroethene (*cis*-1,2-DCE), *trans*-1,2-DCE (*trans*-1,2-DCE), PCE, TCE, and vinyl chloride. In September 2016, under the provisions of the 2015 update to the LTMO and DQO's, the short list of VOC analysis was modified to include PCE, TCE, *cis*-1,2-DCE, and vinyl chloride. Metals analysis for on-post monitoring wells was dropped. However, to meet drinking water compliance requirements, drinking water wells are sampled for the following metals: arsenic, barium, copper, chromium, cadmium, mercury, lead, and zinc.

Each sample is evaluated against either being qualitatively detected in trace amounts above the MDL [F-flagged data], quantitatively detected above the laboratory reporting limit (RL), or in exceedance of regulatory maximum contaminant level (MCL), action level (AL), or secondary standard (SS) comparison criteria. It is important to note that the RL value is significantly less than the promulgated groundwater standard criteria, and therefore the occurrence of a constituent above the RL does not necessarily indicate that there is an immediate concern, especially with the naturally occurring inorganics (metals) in groundwater. The only exception to this generalization is lead, where the RL (0.025 mg/L) is greater than the AL (0.015 mg/L).

All 45 groundwater samples scheduled to be collected in 2016 were completed.

2.2.1.2 On-Post Monitoring Wells with COC Detections above the MCL

Some wells sampled had concentrations detected that exceeded MCLs. The MCLs for some COCs were exceeded in wells CS-MW1-LGR, CS-MW5-LGR, CS-D, and CS-MW36-LGR in 2016. The respective comparison criteria (MCLs, SS, or AL) for each compound are included in **Table 2.5**. The detected concentrations are summarized as follows:

Table 2.4
Overview of On-Post Sampling for 2016

Count	Well ID	Analytes	Last Sample Date	Mar-16	Jun-16	Sep-16 (transition event)*	Dec-16	LTMO Sampling Frequency (as of June 2011)	LTMO Sampling Frequency (as of Sept. 2016)
1	CS-MW1-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Semi-annual + 9 month snapshot	15 months
2	CS-MW1-BS	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-12	NS	NS	NS	NS	sampled on an as needed basis	as needed
3	CS-MW1-CC	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	30 months
4	CS-MW2-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Semi-annual + 9 month snapshot	30 months
5	CS-MW2-CC	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	30 months
6	CS-MW3-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
7	CS-MW4-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
8	CS-MW5-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-16	+	+	S	+	Every 9 months	15 months
9	CS-MW6-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	15 months
10	CS-MW6-BS	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-12	NS	NS	NS	NS	sampled on an as needed basis	as needed
11	CS-MW6-CC	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	30 months
12	CS-MW7-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	15 months
13	CS-MW7-CC	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	30 months
14	CS-MW8-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Semi-annual + 9 month snapshot	15 months
15	CS-MW8-CC	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	15 months
16	CS-MW9-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
17	CS-MW9-BS	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-12	NS	NS	NS	NS	sampled on an as needed basis	as needed
18	CS-MW9-CC	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	30 months
19	CS-MW10-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Semi-annual + 9 month snapshot	15 months
20	CS-MW10-CC	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	30 months
21	CS-MW11A-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Semi-annual + 9 month snapshot	15 months
22	CS-MW11B-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	15 months
23	CS-MW12-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	15 months
24	CS-MW12-BS	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-12	NS	NS	NS	NS	sampled on an as needed basis	as needed
25	CS-MW12-CC	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	30 months
26	CS-MW16-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 9 months	excluded
27	CS-MW16-CC	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 9 months	excluded
28	CW-MW17-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	15 months
29	CS-MW18-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
30	CS-MW19-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
31	CS-1	VOCs & metals (As,Ba,Cr, Cu,Cd,Hg,Pb,Zn)	Dec-16	S	S	S	S	Quarterly	Quarterly
32	CS-2	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
33	CS-4	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Semi-annual + 9 month snapshot	15 months
34	CS-10	VOCs & metals (As,Ba,Cr, Cu,Cd,Hg,Pb,Zn)	Dec-16	S	S	S	S	Quarterly	Quarterly
35	CS-12	VOCs & metals (As,Ba,Cr, Cu,Cd,Hg,Pb,Zn)	Dec-16	S	S	S	S	Quarterly	Quarterly
36	CS-13	VOCs & metals (As,Ba,Cr, Cu,Cd,Hg,Pb,Zn)	Dec-16	S	S	S	S	Quarterly	Quarterly
37	CS-D	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Semi-annual + 9 month snapshot	15 months
38	CS-MWG-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	30 months
39	CS-MWH-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	30 months
40	CS-I	VOCs & metals (Cr, Cd, Hg, Pb)	Dec-15	NS	NS	NS	NS	Every 18 months	30 months
41	CS-MW20-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
42	CS-MW21-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
43	CS-MW22-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
44	CS-MW23-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
45	CS-MW24-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Semi-annual + 9 month snapshot	30 months
46	CS-MW25-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Every 9 months	30 months
47	CS-MW35-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	NS	NS	S	NS	Semi-annual + 9 month snapshot	30 months
48	CS-MW36-LGR	VOCs & metals (Cr, Cd, Hg, Pb)	Sep-16	S	S	S	NS	Quarterly	15 months

Notes/Abbreviations:

* New LTMO sampling frequency implemented September 2016. Metals analysis removed from monitoring wells and drinking water wells metals analysis remains the same.

S = Sample

NS = No Sample

NSWL = No Sample due to low water level

+ = samples not on the schedule but added to the sampling event

Table 2.5
2016 On-post Groundwater COCs and Metals Analytical Results

Well ID	Laboratory	Analytical Method	Sample Date	Dichloro-ethene, 1,1 (ug/L)	Dichloro-ethene, <i>cis</i> - 1,2 (ug/L)	Dichloro-ethene, <i>trans</i> - 1,2 (ug/L)	Tetra-chloroethene (ug/L)	Tri-chloroethene (ug/L)	Vinyl chloride (ug/L)	
CS-1	APPL	SW8260B	3/16/2016	--	--	--	--	--	--	
	APPL	SW8260B	6/17/2016	--	--	--	0.27F	--	--	
	APPL	SW8260B	7/21/2016	--	--	--	--	--	--	
	APPL	SW8260B	9/27/2016	NA	--	NA	--	--	--	
	APPL	SW8260B	12/13/2016	NA	--	NA	0.08F	--	--	
CS-2	APPL	SW8260B	9/9/2016	NA	--	NA	--	--	--	
CS-4	APPL	SW8260B	9/9/2016	NA	--	NA	0.68F	0.64F	--	
	<i>Duplicate</i>	APPL	SW8260B	9/9/2016	NA	0.09F	NA	0.66F	0.57F	
CS-10	APPL	SW8260B	3/16/2016	--	--	--	--	--	--	
	<i>Duplicate</i>	APPL	SW8260B	3/16/2016	--	--	--	--	--	
	APPL	SW8260B	6/17/2016	--	--	--	0.16F	--	--	
	APPL	SW8260B	7/21/2016	--	--	--	--	--	--	
	<i>Duplicate</i>	APPL	SW8260B	9/27/2016	NA	--	NA	--	--	--
		APPL	SW8260B	9/27/2016	NA	--	NA	--	--	--
		APPL	SW8260B	12/13/2016	NA	--	NA	0.09F	--	--
<i>Duplicate</i>	APPL	SW8260B	12/13/2016	NA	--	NA	--	--		
CS-12	APPL	SW8260B	3/16/2016	--	--	--	--	--	--	
	APPL	SW8260B	6/17/2016	--	--	--	0.35F	--	--	
	APPL	SW8260B	7/21/2016	--	--	--	--	--	--	
	<i>Duplicate</i>	APPL	SW8260B	7/21/2016	--	--	--	--	--	
	APPL	SW8260B	9/27/2016	NA	--	NA	--	--	--	
	APPL	SW8260B	12/13/2016	NA	--	NA	0.08F	--	--	
CS-13	APPL	SW8260B	3/16/2016	--	--	--	--	--	--	
	APPL	SW8260B	6/20/2016	--	--	--	--	--	--	
	APPL	SW8260B	10/3/2016	NA	--	NA	--	--	--	
CS-D	APPL	SW8260B	9/22/2016	NA	12.71	NA	13.14	18.9	--	
CS-MWG-LGR	APPL	SW8260B	2/3/2016	--	--	--	--	--	--	
CS-MWH-LGR	APPL	SW8260B	2/3/2016	--	--	--	--	--	--	
CS-I	APPL	SW8260B	2/3/2016	--	--	--	--	--	--	
CS-MW1-LGR	APPL	SW8260B	9/21/2016	NA	24.14	NA	15.1	24.46	--	
CS-MW2-LGR	APPL	SW8260B	9/9/2016	NA	0.49F	NA	--	--	--	
CS-MW3-LGR	APPL	SW8260B	9/13/2016	NA	--	NA	--	--	--	
CS-MW4-LGR	APPL	SW8260B	9/9/2016	NA	--	NA	--	--	--	
CS-MW5-LGR	APPL	SW8260B	2/3/2016	--	16.12	0.43F	7.68	17.93	--	
	APPL	SW8260B	3/8/2016	--	16.94	0.44F	6.99	18.68	--	
	APPL	SW8260B	6/7/2016	--	10.5	--	4.18	10.96	--	
	APPL	SW8260B	9/9/2016	NA	10.89	NA	5.2	12.32	--	
	APPL	SW8260B	12/12/2016	NA	12.86	NA	5.26	12.91	--	
CS-MW6-LGR	APPL	SW8260B	9/12/2016	NA	--	NA	--	--	--	
CS-MW7-LGR	APPL	SW8260B	9/12/2016	NA	--	NA	0.72F	--	--	
CS-MW8-LGR	APPL	SW8260B	9/12/2016	NA	--	NA	2.66	--	--	
CS-MW9-LGR	APPL	SW8260B	9/13/2016	NA	--	NA	--	--	--	
CS-MW10-LGR	APPL	SW8260B	9/12/2016	NA	--	NA	2.02	0.41F	--	
CS-MW11A-LGR	APPL	SW8260B	9/12/2016	NA	--	NA	0.56F	--	--	
	<i>Duplicate</i>	APPL	SW8260B	9/12/2016	NA	--	NA	0.60F	--	
CS-MW11B-LGR	APPL	SW8260B	9/13/2016	NA	--	NA	0.90F	--	--	
CS-MW12-LGR	APPL	SW8260B	9/8/2016	NA	--	NA	--	--	--	
CS-MW17-LGR	APPL	SW8260B	9/21/2016	NA	--	NA	0.74F	--	--	
CS-MW18-LGR	APPL	SW8260B	9/9/2016	NA	--	NA	--	--	--	
CS-MW19-LGR	APPL	SW8260B	9/8/2016	NA	--	NA	--	--	--	
CS-MW20-LGR	APPL	SW8260B	9/13/2016	NA	--	NA	1.47	--	--	
CS-MW21-LGR	APPL	SW8260B	9/13/2016	NA	--	NA	--	--	--	
CS-MW22-LGR	APPL	SW8260B	9/13/2016	NA	--	NA	--	--	--	
CS-MW23-LGR	APPL	SW8260B	9/13/2016	NA	--	NA	--	--	--	
CS-MW24-LGR	APPL	SW8260B	9/14/2016	NA	--	NA	--	--	--	

Table 2.5
2016 On-post Groundwater COCs and Metals Analytical Results

Well ID	Laboratory	Analytical Method	Sample Date	Dichloroethene, 1,1 (ug/L)	Dichloroethene, <i>cis</i> - 1,2 (ug/L)	Dichloroethene, <i>trans</i> - 1,2 (ug/L)	Tetrachloroethene (ug/L)	Trichloroethene (ug/L)	Vinyl chloride (ug/L)
CS-MW25-LGR	APPL	SW8260B	2/3/2016	--	--	--	--	--	--
	APPL	SW8260B	9/13/2016	NA	--	NA	0.07F	--	--
CS-MW35-LGR	APPL	SW8260B	9/12/2016	NA	--	NA	0.96F	--	--
CS-MW36-LGR	APPL	SW8260B	3/8/2016	--	0.28F	--	8.26	7.86	--
	APPL	SW8260B	6/7/2016	--	--	--	4.12	1.53	--
	APPL	SW8260B	9/12/2016	NA	--	NA	5.35	2.35	--
Comparison Criteria									
Maximum Contaminant Level (MCL)				7	70	100	5.0	5.0	2.0
Reporting Limit (RL)				1.2	1.2	0.6	1.4	1.0	1.1
MDL				0.12	0.07	0.08	0.06	0.05	0.08
BOLD	≥ MDL								
BOLD	≥ RL								
BOLD	≥ MCL								

All samples were analyzed by APPL, Inc.
VOC data reported in ug/L & metals data reported in mg/L.
Abbreviations/Notes:
Duplicate Field Duplicate
TCE Trichloroethene
PCE Tetrachloroethene
DCE Dichloroethene
Data Qualifiers
NA = Analyte not analyzed
-- = The analyte was analyzed for, but not detected. The associated numerical value is at or below the MDL.
F = The analyte was positively identified but the associated numerical value is below the RL.

Table 2.5
2016 On-post Groundwater COCs and Metals Analytical Results

Well ID	Laboratory	Sample Date	Arsenic (mg/L)	Barium (mg/L)	Cadmium (mg/L)	Chromium (mg/L)	Copper (mg/L)	Lead (mg/L)	Mercury (mg/L)	Zinc (mg/L)
CS-1	APPL	3/16/2016	0.0067F	0.0344	--	--	0.005F	--	--	0.208
	APPL	6/17/2016	0.0078F	0.0395	--	0.0016F	0.014	0.0068F	--	0.284
	APPL	9/27/2016	--	0.0379	--	--	0.008F	--	--	0.392
	APPL	12/13/2016	0.00483F	0.0379	--	--	0.009F	--	--	0.230
CS-10 <i>Duplicate</i>	APPL	3/16/2016	0.0027F	0.0402	--	--	0.007F	--	0.0002F	0.751
	APPL	3/16/2016	0.0045F	0.0389	--	--	0.006F	--	0.0002F	0.708
	APPL	6/17/2016	0.0060F	0.0403	--	0.0014F	0.005F	0.0050F	--	0.357
	APPL	9/27/2016	--	0.0412	--	0.0013F	0.015	--	--	0.601
	APPL	9/27/2016	0.00024F	0.0429	--	--	0.005F	--	--	0.522
	APPL	12/13/2016	0.00571F	0.0396	--	--	0.005F	--	--	0.374
	APPL	12/13/2016	0.00236F	0.0396	--	--	0.012	--	--	0.413
CS-12	APPL	3/16/2016	0.0048F	0.0308	--	--	0.006F	--	--	0.049F
	APPL	6/17/2016	0.0070F	0.0314	--	0.0016F	0.035	0.0096F	--	0.104
	APPL	9/27/2016	0.00160F	0.031	--	0.0013F	0.006F	--	--	0.047F
	APPL	12/13/2016	0.00682F	0.0318	--	--	0.031	--	--	0.054
CS-13	APPL	3/16/2016	0.0067F	0.0297	--	--	0.005F	--	--	0.247
	APPL	6/20/2016	0.0028F	0.0308	--	0.0017F	--	--	--	0.276
	APPL	10/3/2016	0.00508F	0.0321	--	0.0015F	--	0.0027F	--	0.227
CS-MW5-LGR	APPL	3/8/2016	NA	NA	--	--	NA	--	--	NA
	APPL	6/7/2016	NA	NA	--	--	NA	--	--	NA
CS-MW36-LGR	APPL	3/8/2016	NA	NA	--	0.0131	NA	--	--	NA
	APPL	6/7/2016	NA	NA	--	0.0036F	NA	--	--	NA

Table 2.5
2016 On-post Groundwater COCs and Metals Analytical Results

Well ID	Laboratory	Sample Date	Arsenic (mg/L)	Barium (mg/L)	Cadmium (mg/L)	Chromium (mg/L)	Copper (mg/L)	Lead (mg/L)	Mercury (mg/L)	Zinc (mg/L)
Comparison Criteria										
Maximum Contaminant Level (MCL)			0.01	2.0	0.005	0.1	1.3	0.015 (AL)	0.002	5.0 (SS)
		RL	0.03	0.005	0.007	0.01	0.01	0.025	0.001	0.05
		MDL	0.00022	0.0003	0.0005	0.001	0.003	0.0019	0.0001	0.008
Bold	≥ MCL									
Bold	≥ RL									
Bold	≥ MDL									

All samples were analyzed by APPL, Inc. using laboratory method SW8260B.
 VOC data reported in µg/L & metals data reported in mg/L.

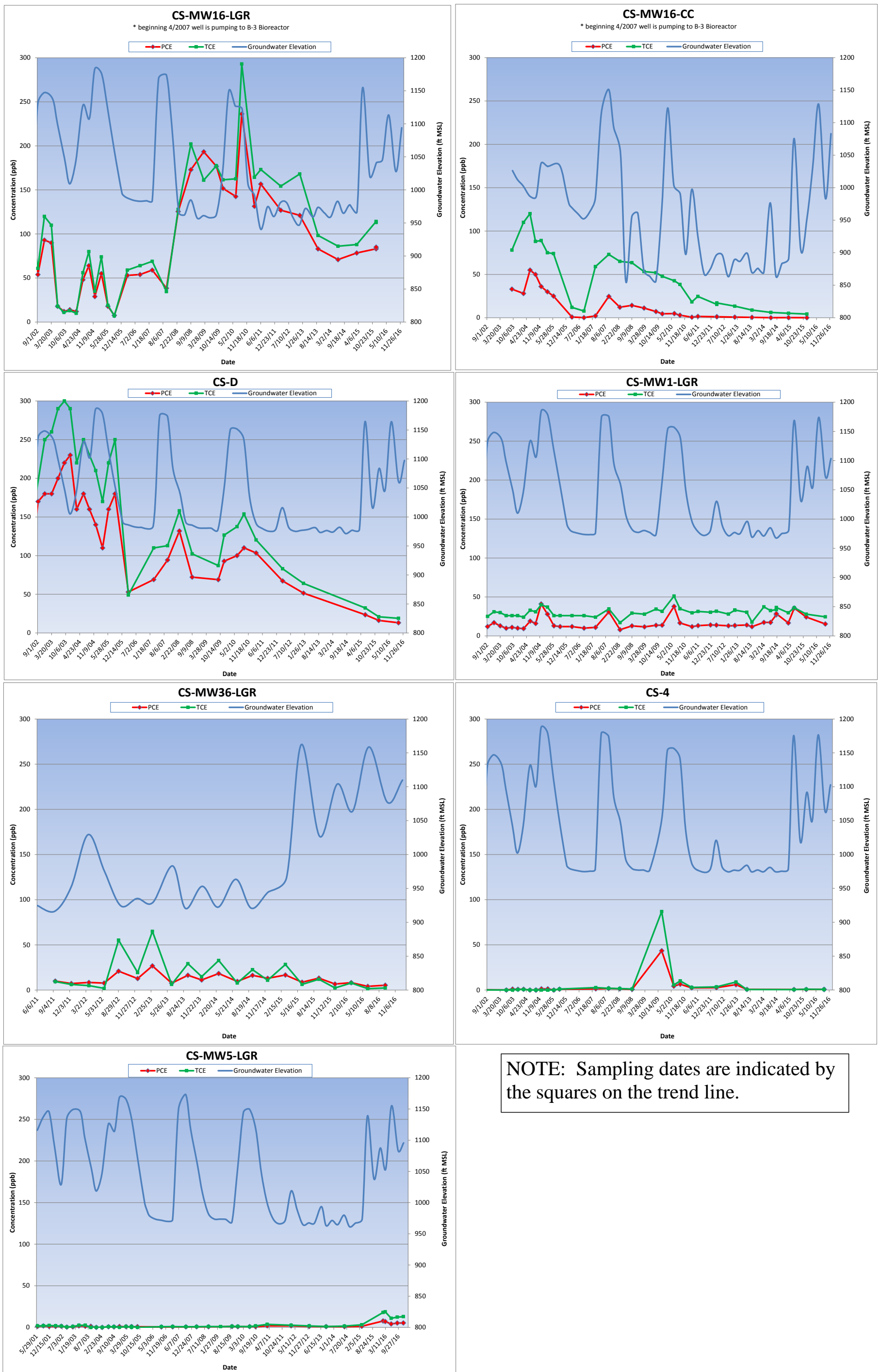
Abbreviations/Notes:
 µg/L micrograms per liter
 mg/L milligrams per liter
Duplicate Field Duplicate
 AL Action Level
 SS Secondary Standard

Data Qualifiers:
 NA = Analyte not analyzed
 F = The analyte was positively identified but the associated numerical value is below the RL.
 -- =The analyte was analyzed for, but not detected. The associated numerical value is at or below the MDL.

- **CS-MW1-LGR** – This well was sampled once in 2016. PCE and TCE concentrations were above their MCLs in September 2016. *Cis*-1,2-DCE was also detected below the MCL in September 2016.
- **CS-D** – This well was sampled in September 2016. PCE and TCE concentrations were above their MCLs in September 2016. *Cis*-1,2-DCE was also detected below the MCL in September 2016.
- **CS-MW5-LGR** – This well was sampled five times in 2016. PCE and/or TCE concentrations were above their MCLs in all five 2016 samples. *Cis*-1,2-DCE and *trans*-1,2-DCE were also detected below the MCL in February and March. PCE and TCE concentrations were first reported above the MCL in February 2016, this well has been monitored since June 2001.
- **CS-MW36-LGR** – This well was sampled during the March, June, and September events in 2016. PCE was above the MCL in the March and September events. TCE was above the MCL in March then fell below the MCL in June and September. *Cis*-1,2-DCE was also detected below the MCL in March. Chromium was detected below the MCL in March and June.

Concentration trends are illustrated on **Figure 2.4** for wells CS-MW16-LGR, CS-MW16-CC, CS-D, CS-MW1-LGR, CS-MW5-LGR, CS-MW36-LGR, and CS-4. These wells were selected because they have historical detections of PCE and TCE that approach and/or exceed MCLs. **Figure 2.4** also includes groundwater elevation data from each respective well to determine if there are correlations between VOC concentrations and water level. This figure suggests that CS-MW1-LGR has the most direct correlation between PCE/TCE concentration and groundwater recharge events. After that, discernible trends are less evident. Quarterly monitoring of CS-MW16-LGR and CS-D seems to indicate that increases in VOC concentrations lag recharge events by roughly six to nine months. CS-MW16-LGR and CS-MW16-CC have been removed from the groundwater monitoring program per the updated LTMO study and DQO's.

Figure 2.4 On-Post Cumulative Analytical vs. Groundwater Elevation



NOTE: Sampling dates are indicated by the squares on the trend line.

Notable trends in other wells appear to be related more to remedial activities than precipitation/recharge events. Concentrations at CS-MW16-CC decreased between March 2004 and June 2005 during a 15-month pump test of that well. Then concentrations increased in early 2007 during a time that roughly corresponds to the start-up of SWMU B-3 Bioreactor operations. Since that time, groundwater has been continually pumped from CS-MW16-CC and applied to the bioreactor as a remedial alternative. During that timeframe, VOC concentrations have steadily decreased, with little fluctuation attributable to precipitation. It is debatable whether the CS-MW36-LGR concentrations have responded to the in-situ chemical oxidation (ISCO) injections at AOC-65 in August 2012, May-June 2013, September-October 2014, and August-November 2015. The singular PCE/TCE peak at CS-4 has been attributed to the SWMU B-3 flood test in September 2009.

The VOC concentrations at CS-MW5-LGR have historically been below the MCLs since the well's inception in 2001. However, PCE, TCE, and *cis*-1,2-DCE all increased five-fold in the most recent 2015 sampling event (and confirmed in February 2016). The recent significant increase in contamination in well CS-MW5-LGR could be a result of the above average rainfall in 2015 and 2016. This area has not seen above average rainfall since before the historical drought of 2011. This, coupled with remedial activities at the SWMU B-3 bioreactor to the west of this well, may have contributed to this increase. This well will remain on the quarterly monitoring schedule to track the progression of VOC concentrations at this location.

2.2.1.3 On-Post Monitoring Wells with COC Detections below the MCL

Groundwater monitoring results included wells where COCs were detected at levels below the applicable MCLs, SS, or ALs but above RLs. These included wells CS-MW8-LGR, CS-MW10-LGR, and CS-MW20-LGR. The detections below the MCLs/ALs but above RLs are summarized as follows:

- **CS-MW8-LGR** - PCE was detected in September 2016; above the RL but below the MCL.
- **CS-MW10-LGR** – PCE (above RL) and TCE (below RL) concentrations were detected below their MCLs in September 2016.
- **CS-MW20-LGR** – PCE concentrations were detected below the RL in September 2016.

2.2.1.4 On-Post Monitoring Wells with COC Detections below the Reporting Limits

The on-post results include detections in wells for which the analyte is identified, but at a concentration below the RL. These results are assigned an “F” flag under the CSSA Quality Assurance Project Plan (QAPP). In 2016, this included wells CS-4, CS-MW2-LGR, CS-MW7-LGR, CS-MW11A-LGR, CS-MW11B-LGR, CS-MW17-LGR, CS-MW25-LGR, and CS-MW35-LGR. Metals analysis was dropped from the schedule in September 2016 in accordance with the 2015 update to the LTMO study and DQO's. The detections below the reporting limit are summarized as follows:

- **CS-4** – This well was sampled once in September 2016. PCE and TCE were detected below the RL. *Cis*-1,2-DCE was also detected below the RL in the field duplicate.

- **CS-MW2-LGR** – This well was sampled once in 2016. *Cis*-1,2-DCE was detected below the RL in September 2016.
- **CS-MW7-LGR** – PCE was detected below the RL in September 2016.
- **CS-MW11A-LGR** – PCE was detected below the RL in September 2016. PCE was also detected in the field duplicate.
- **CS-MW11B-LGR** – PCE was detected below the RL in September 2016.
- **CS-MW17-LGR** – PCE was detected below the RL in September 2016. With concentrations of 0.74 µg/L this is the highest concentration reported in this well since sampling of the well began in 2002.
- **CS-MW25-LGR** – PCE was detected below the RL in September 2016. This is the first VOC detection in this well since sampling began in 2007.
- **CS-MW35-LGR** – PCE was detected below the RL in September 2016.

2.2.1.5 On-Post Monitoring Wells with No COC Detections

Of the 30 monitoring wells sampled in 2016, 15 wells reported COC detections. A total of 15 wells (CS-2, CS-MWG-LGR, CS-MWH-LGR, CS-I, CS-MW3-LGR, CS-MW4-LGR, CS-MW6-LGR, CS-MW9-LGR, CS-MW12-LGR, CS-MW18-LGR, CS-MW19-LGR, CS-MW21-LGR, CS-MW22-LGR, CS-MW23-LGR, and CS-MW24-LGR) reported no VOC or metals detections. In 2016 all scheduled samples were collected (**Table 2.4**). Details on the RL, MDLs, field duplicates, MCLs, etc., are described in the tables of detections (**Table 2.5**) and in **Appendix B**.

2.2.1.6 Drinking Water Supply Well Results

Three active CSSA drinking water supply wells (CS-1, CS-10, and CS-12) and one future drinking water well (CS-13) were analyzed for VOCs and the 8 metals (arsenic, barium, cadmium, chromium, copper, lead, mercury, and zinc) in 2016. Three extra samples were collected from wells CS-1, CS-10, and CS-12 in July to substantiate detections from the June sampling event. Under the LTMO study, the drinking water supply wells are scheduled to be sampled quarterly (**Table 2.4 & Appendix B**). The detections are summarized as follows:

- **CS-1** – PCE was detected in June and December during the 5 sampling events in 2016. Barium and zinc were above their applicable RLs in all four quarters in 2016. Copper was also above the RL in June 2016. Arsenic, chromium, and lead were also detected below the RL in 2016.
- **CS-10** – Trace amounts of PCE were detected in June and December 2016. Barium, copper, and zinc were detected above the RLs in 2016. Arsenic, chromium, lead, and mercury were also detected below their applicable RL in 2016.
- **CS-12** – PCE was detected in June and December during the 5 sampling events in 2016. Barium, copper, and zinc were detected above their applicable RLs in 2016. Arsenic, chromium, and lead were also detected below their applicable RLs in 2016.
- **CS-13** – No VOCs were detected in this well in 2016. Samples were not collected from this well in December due to well house construction. Barium and zinc were detected above their applicable RLs in 2016. Arsenic, chromium, and lead were detected below their applicable RL's.

2.2.1.7 Westbay®-equipped Well Results

Eight wells equipped with the Westbay multi-port interval sampling equipment have been installed at CSSA. Four wells (CS-WB05, CS-WB06, CS-WB07, and CS-WB08) are sampled as part of the SWMU B-3 bioreactor treatability study and are not addressed in this report. The remaining four wells (CS-WB01, CS-WB02, CS-WB03, and CS-WB04) are part of the postwide groundwater monitoring program and are included in this report. Under the provisions of the groundwater monitoring DQOs and the 2010 updated LTMO study, the schedule for sampling CS-WB01, CS-WB02, and CS-WB03 is every 9 months with 3 additional LTMO-selected zones sampled with the 9 month snapshot event. The schedule for sampling CS-WB04 UGR, LGR, BS, and CC zones is every 18 months with 7 of those zones sampled every 9 months and an additional 5 LTMO-selected zones sampled with the 9 month snapshot event. These frequencies were updated in 2015 to a 15 month schedule for all zones except CS-WB04 BS and CC zones which will be sampled on a 30 month schedule. This new schedule was implemented in September 2016 after approval was received from the TCEQ and EPA. An overview of sampling frequencies for Westbay wells is given in **Table 2.6**.

Samples were collected from zones included in the 9 month schedule in June and September 2016. No samples were scheduled for collection in March and December 2016. Samples were analyzed for PCE, TCE, *cis*-1,2-DCE, *trans*-1,2-DCE, 1,1-DCE, and vinyl chloride in March and June. In September, the updated LTMO study and DQO's were implemented which excluded analysis of *trans*-1,2-DCE and 1,1-DCE from the above mentioned list. All samples were analyzed by APPL. Per the DQOs, the Westbay data are used for screening purposes only, and therefore no quality assurance/quality control samples are collected with the Westbay samples. All intervals with detections of COCs are presented in **Table 2.7**. Full analytical results are presented in **Appendix C**. **Appendix D** illustrates the historical contaminant concentrations and groundwater elevations for each Westbay zone.

Table 2.6
Overview of Westbay Sampling for 2016

Westbay Interval	Last Sample Date	Mar-16	Jun-16 (9 month)	Sep-16 (transition event)	Dec-16	LTMO Sampling Frequency (as of June 2011)	LTMO Sampling Frequency (as of Sept. 2016)
CS-WB01-UGR-01	Jun-16	NS	S	NSWL	NS	Every 9 months	15 months
CS-WB01-LGR-01	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB01-LGR-02	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB01-LGR-03	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB01-LGR-04	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB01-LGR-05	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB01-LGR-06	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB01-LGR-07	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB01-LGR-08	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB01-LGR-09	Sep-16	NS	S	S	NS	Every 9 months + snapshot	15 months
CS-WB02-UGR-01	Dec-04	NS	NSWL	NSWL	NS	Every 9 months	15 months
CS-WB02-LGR-01	Jun-16	NS	S	NSWL	NS	Every 9 months	15 months
CS-WB02-LGR-02	Jun-16	NS	S	NSWL	NS	Every 9 months	15 months
CS-WB02-LGR-03	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB02-LGR-04	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB02-LGR-05	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB02-LGR-06	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB02-LGR-07	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB02-LGR-08	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB02-LGR-09	Sep-16	NS	S	S	NS	Every 9 months + snapshot	15 months
CS-WB03-UGR-01	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB03-LGR-01	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB03-LGR-02	Oct-07	NS	S	NSWL	NS	Every 9 months	15 months
CS-WB03-LGR-03	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB03-LGR-04	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB03-LGR-05	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB03-LGR-06	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB03-LGR-07	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB03-LGR-08	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB03-LGR-09	Sep-16	NS	S	S	NS	Every 9 months + snapshot	15 months
CS-WB04-UGR-01	Mar-04	NS	NSWL	NSWL	NS	Every 9 months	15 months
CS-WB04-LGR-01	Sep-15	NS	NS	NS	NS	Every 18 months	15 months
CS-WB04-LGR-02	Mar-14	NS	NS	NS	NS	Every 18 months	15 months
CS-WB04-LGR-03	Sep-15	NS	NS	NS	NS	Every 18 months	15 months
CS-WB04-LGR-04	Sep-15	NS	NS	NS	NS	Every 18 months	15 months
CS-WB04-LGR-06	Sep-16	NS	S	S	NS	Every 9 months + snapshot	15 months
CS-WB04-LGR-07	Sep-16	NS	S	S	NS	Every 9 months + snapshot	15 months
CS-WB04-LGR-08	Sep-16	NS	S	S	NS	Every 9 months	15 months
CS-WB04-LGR-09	Sep-16	NS	S	S	NS	Every 9 months + snapshot	15 months
CS-WB04-LGR-10	Sep-16	NS	S	S	NS	Every 9 months + snapshot	15 months
CS-WB04-LGR-11	Sep-16	NS	S	S	NS	Every 9 months + snapshot	15 months
CS-WB04-BS-01	Sep-15	NS	NS	NS	NS	Every 18 months	30 months
CS-WB04-BS-02	Sep-15	NS	NS	NS	NS	Every 18 months	30 months
CS-WB04-CC-01	Sep-15	NS	NS	NS	NS	Every 18 months	30 months
CS-WB04-CC-02	Sep-15	NS	NS	NS	NS	Every 18 months	30 months
CS-WB04-CC-03	Sep-15	NS	NS	NS	NS	Every 18 months	30 months

Profiling performed quarterly, in conjunction with post wide water levels.

S = sample

NS = no sample

NSWL = no sample due to low water level

Table 2.7
2016 Westbay® Groundwater COCs Analytical Results

Well ID	Date	1,1-DCE	cis-1,2-DCE	trans-1,2-DCE	TCE	PCE	Vinyl Chloride
Method Detection Limit	MDL	0.3	0.16	0.19	0.16	0.15	0.23
Current Reporting Limit	RL	1.2	1.2	0.6	1.0	1.4	1.1
Max. Contaminant Level	MCL	7.0	70	100	5.0	5.0	2.0
CS-WB01-UGR-01	8-Jun-16	--	--	--	--	0.99F	--
	14-Sep-16	Dry	Dry	Dry	Dry	Dry	Dry
CS-WB01-LGR-01	8-Jun-16	--	--	--	0.22F	1.36F	--
	14-Sep-16	NA	--	NA	0.53F	0.93F	--
CS-WB01-LGR-02	8-Jun-16	--	--	--	2.05	9.6	--
	14-Sep-16	NA	--	NA	2.46	11.55	--
CS-WB01-LGR-03	8-Jun-16	--	--	--	19.59	7.06	--
	14-Sep-16	NA	--	NA	12.67	4.26	--
CS-WB01-LGR-04	8-Jun-16	--	0.28F	--	--	--	--
	14-Sep-16	NA	0.49F	NA	--	--	--
CS-WB01-LGR-05	8-Jun-16	--	0.41F	--	2.6	--	--
	14-Sep-16	NA	0.60F	NA	1.36	--	--
CS-WB01-LGR-06	8-Jun-16	--	1.58	--	3.03	--	--
	14-Sep-16	NA	2.10	NA	3.11	--	--
CS-WB01-LGR-07	8-Jun-16	--	0.29F	--	13.78	14.3	--
	14-Sep-16	NA	0.23F	NA	13.99	13.07	--
CS-WB01-LGR-08	8-Jun-16	--	18.31	0.76	4.59	0.79F	--
	14-Sep-16	NA	20.78	NA	2.81	--	--
CS-WB01-LGR-09	8-Jun-16	--	0.69F	--	12.56	9.55	--
	14-Sep-16	NA	0.49F	NA	10.89	7.95	--
CS-WB02-UGR-01	14-Jun-16	Dry	Dry	Dry	Dry	Dry	Dry
	15-Sep-16	NA	Dry	NA	Dry	Dry	Dry
CS-WB02-LGR-01	14-Jun-16	--	--	--	--	0.59F	--
	15-Sep-16	NA	Dry	NA	Dry	Dry	Dry
CS-WB02-LGR-02	14-Jun-16	--	--	--	--	0.22F	--
	15-Sep-16	NA	Dry	NA	Dry	Dry	Dry
CS-WB02-LGR-03	14-Jun-16	--	--	--	0.47F	3.28	--
	15-Sep-16	NA	--	NA	--	2.35	--
CS-WB02-LGR-04	14-Jun-16	--	--	--	5.03	2.86	--
	15-Sep-16	NA	--	NA	5.04	2.8	--
CS-WB02-LGR-05	14-Jun-16	--	0.23F	0.25F	1.92	0.66F	--
	15-Sep-16	NA	0.28F	NA	1.79	--	--
CS-WB02-LGR-06	14-Jun-16	--	--	--	2.27	5.38	--
	15-Sep-16	NA	--	NA	1.93	3.81	--
CS-WB02-LGR-07	14-Jun-16	--	0.31F	--	1.57	0.52F	--
	15-Sep-16	NA	0.40F	NA	1.34	0.48F	--
CS-WB02-LGR-08	14-Jun-16	--	3.1	0.36F	0.28F	--	--
	15-Sep-16	NA	4.28	NA	--	--	--
CS-WB02-LGR-09	14-Jun-16	--	--	--	7.42	7.31	--
	15-Sep-16	NA	--	NA	6.81	7.05	--
CS-WB03-UGR-01	16-Jun-16	--	7.94	0.95	73.39	7443.88*	--
	19-Sep-16	NA	16.67	NA	129.76*	9817.43*	--
CS-WB03-LGR-01	16-Jun-16	--	0.89F	--	17.22	314.33*	--
	19-Sep-16	NA	0.71F	NA	15.75	337.86*	--
CS-WB03-LGR-02	16-Jun-16	--	--	--	4.7	146.66*	--
	19-Sep-16	NA	Dry	NA	Dry	Dry	Dry
CS-WB03-LGR-03	16-Jun-16	--	--	--	1.13	3.79	--
	19-Sep-16	NA	--	NA	1.21	4.47	--
CS-WB03-LGR-04	16-Jun-16	--	0.25F	--	6.59	17.97	--
	19-Sep-16	NA	0.30F	NA	5.57	15.06	--

Table 2.7
2016 Westbay® Groundwater COCs Analytical Results

Well ID	Date	1,1-DCE	cis-1,2-DCE	trans-1,2-DCE	TCE	PCE	Vinyl Chloride
Method Detection Limit	MDL	0.3	0.16	0.19	0.16	0.15	0.23
Current Reporting Limit	RL	1.2	1.2	0.6	1.0	1.4	1.1
Max. Contaminant Level	MCL	7.0	70	100	5.0	5.0	2.0
CS-WB03-LGR-05	15-Jun-16	--	--	--	2.48	14.1	--
	19-Sep-16	NA	--	NA	2.67	15.71	--
CS-WB03-LGR-06	15-Jun-16	--	6.83	--	0.13F	--	--
	19-Sep-16	NA	8.87	NA	--	--	--
CS-WB03-LGR-07	15-Jun-16	--	3.09	--	21.75	6.22	--
	19-Sep-16	NA	3.47	NA	10.62	2.82	--
CS-WB03-LGR-08	15-Jun-16	--	2.73	--	0.27F	--	0.81F
	19-Sep-16	NA	3.14	NA	0.41F	--	1.14
CS-WB03-LGR-09	15-Jun-16	--	--	--	2.69	1.94	--
	19-Sep-16	NA	--	NA	2.87	2.64	--
CS-WB04-UGR-01	9-Jun-16	Dry	Dry	Dry	Dry	Dry	Dry
	20-Sep-16	NA	Dry	NA	Dry	Dry	Dry
CS-WB04-LGR-01	20-Sep-16	NA	--	NA	--	1.11F	--
CS-WB04-LGR-06	9-Jun-16	--	3.83	0.24F	13.37	13.96	--
	20-Sep-16	NA	5.53	NA	18.38	12.8	--
CS-WB04-LGR-07	9-Jun-16	--	37.11	0.23F	1.15	--	--
	20-Sep-16	NA	40.9	NA	2.15	0.40F	--
CS-WB04-LGR-08	9-Jun-16	--	--	--	0.86F	0.51F	--
	20-Sep-16	NA	0.42F	NA	1.29	1.41	--
CS-WB04-LGR-09	9-Jun-16	--	--	--	6.02	7.6	--
	20-Sep-16	NA	--	NA	7.84	14.72	--
CS-WB04-LGR10	9-Jun-16	--	--	--	0.73F	1.71	--
	20-Sep-16	NA	--	NA	0.57F	4.34	--
CS-WB04-LGR-11	9-Jun-16	--	--	--	--	--	--
	20-Sep-16	NA	--	NA	--	1.41F	--
BOLD	≥ MDL						
BOLD	≥ RL						
BOLD	≥ MCL						

Data Qualifiers

F = The analyte was positively identified but the associated numerical value is below the RL

* = dilution was performed for this sample.

-- = The analyte was analyzed for, but not detected. The associated numerical value is at or below the MDL.

NA = not analyzed

All values are reported in µg/L.

Additional samples were collected from the Westbay wells in conjunction with the normal quarterly groundwater monitoring in 2016. An ongoing ISCO treatability study is currently being conducted at AOC-65. The results of this effort are currently being tabulated and will be reported in a separate treatability study document.

Due to low groundwater elevations, certain zones (CS-WB01-UGR-01, CS-WB02-UGR-01, CS-WB02-LGR-01, CS-WB02-LGR-02, CS-WB03-LGR-02, and CS-WB04-UGR-01) could not be sampled in June and/or September because they were dry. CS-WB04-LGR-05 was not sampled due to a non-operational sampling port. The remaining 66 zones scheduled for sampling contained water and were sampled. The Westbay-equipped wells are sampled using Westbay Instruments, Inc., equipment and sampling methods.

The following Westbay intervals (shown in their general stratigraphic position) reported detections of PCE and/or TCE above the MCL in 2016.

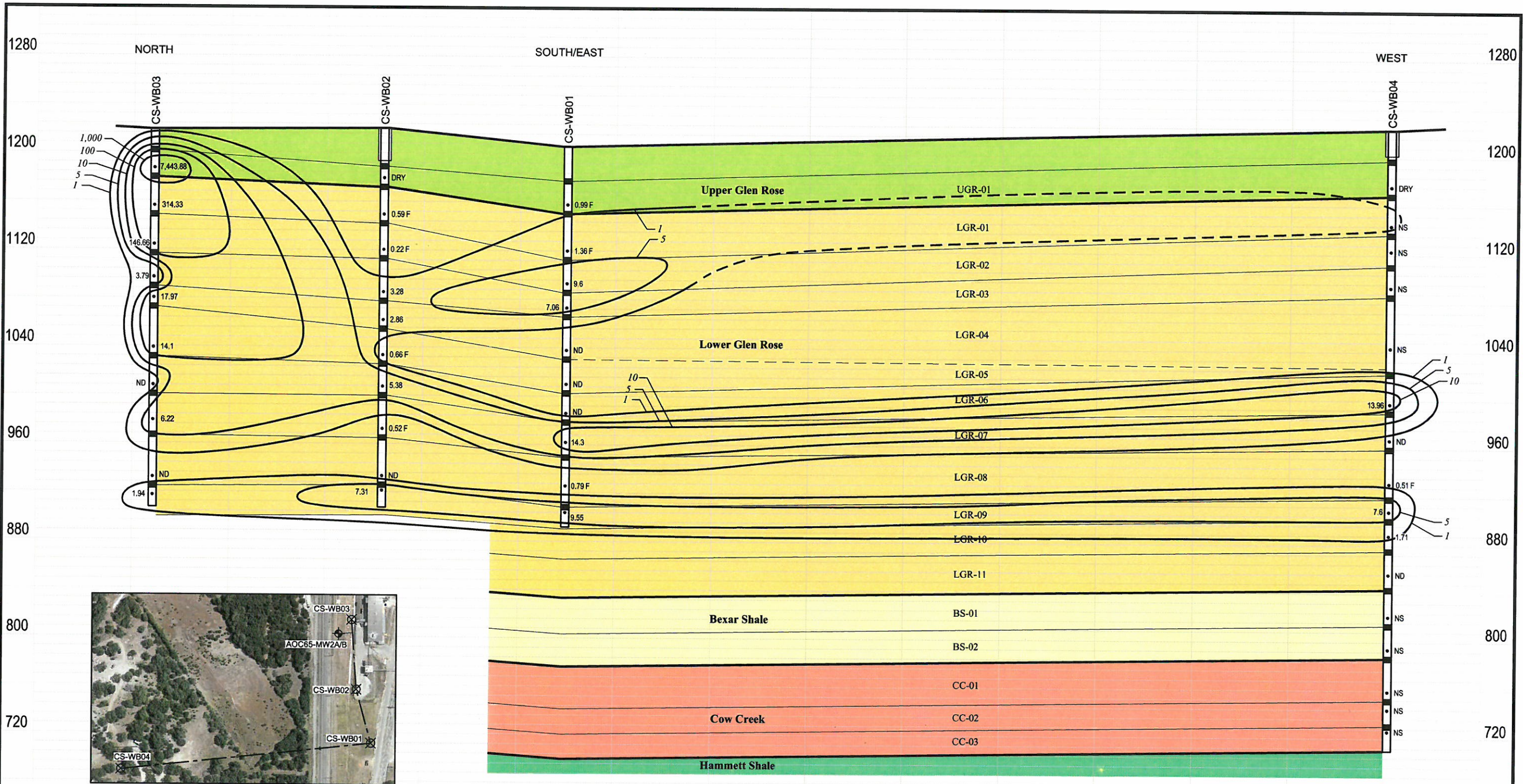
CS-WB01	CS-WB02	CS-WB03	CS-WB04
-	-	• UGR-01	-
-	-	• LGR-01	-
• LGR-02	-	• LGR-02	-
• LGR-03	-	-	-
-	• LGR-04	• LGR-04	-
-	-	• LGR-05	-
-	• LGR-06	-	• LGR-06
• LGR-07	-	• LGR-07	-
-	-	-	-
• LGR-09	• LGR-09	-	• LGR-09
			-
			-

Figures 2.5 through 2.8 present the June and September 2016 vertical distribution of the VOC plume within the multi-port wells for the most pervasive contaminants, PCE and TCE. The following discussion presents general observations that have been noted since the inception of Westbay monitoring at AOC-65.

In 2016, the VOC plume originating from AOC-65 is generally similar in concentration and distribution as in prior years. Near the source area (CS-WB03 and –WB02), the solvent contamination is persistent throughout the entire thickness of the LGR, with the greatest concentrations near the land surface; however non-detections of PCE within the LGR-08 zone in the source area and detections below the reporting limit in this zone at CS-WB01 and CS-WB04 (to the south and west of the source area) result in two PCE plumes separated by the LGR-08 zone. As the plume disperses to the south and west, the contaminants seem to preferentially migrate in stratified lobes (LGR-01, -02, and -03), (LGR-06 and -07) and LGR-09.

The BS and CC zones at CS-WB04 are sampled every 18 months, which excluded them from being sampled in 2016. In prior years the BS and CC zones at CS-WB04 generally had little

810000.04100 D:\CSSA PROGRAM\RESTORATION\GROUNDWATER\CAD\CSSA-VD-PCE-0616.DWG 3/22/17

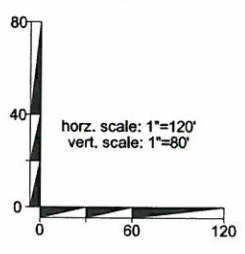


Index Map

Legend

- Casing
- Boring
- Packer
- Sample Port
- Screen

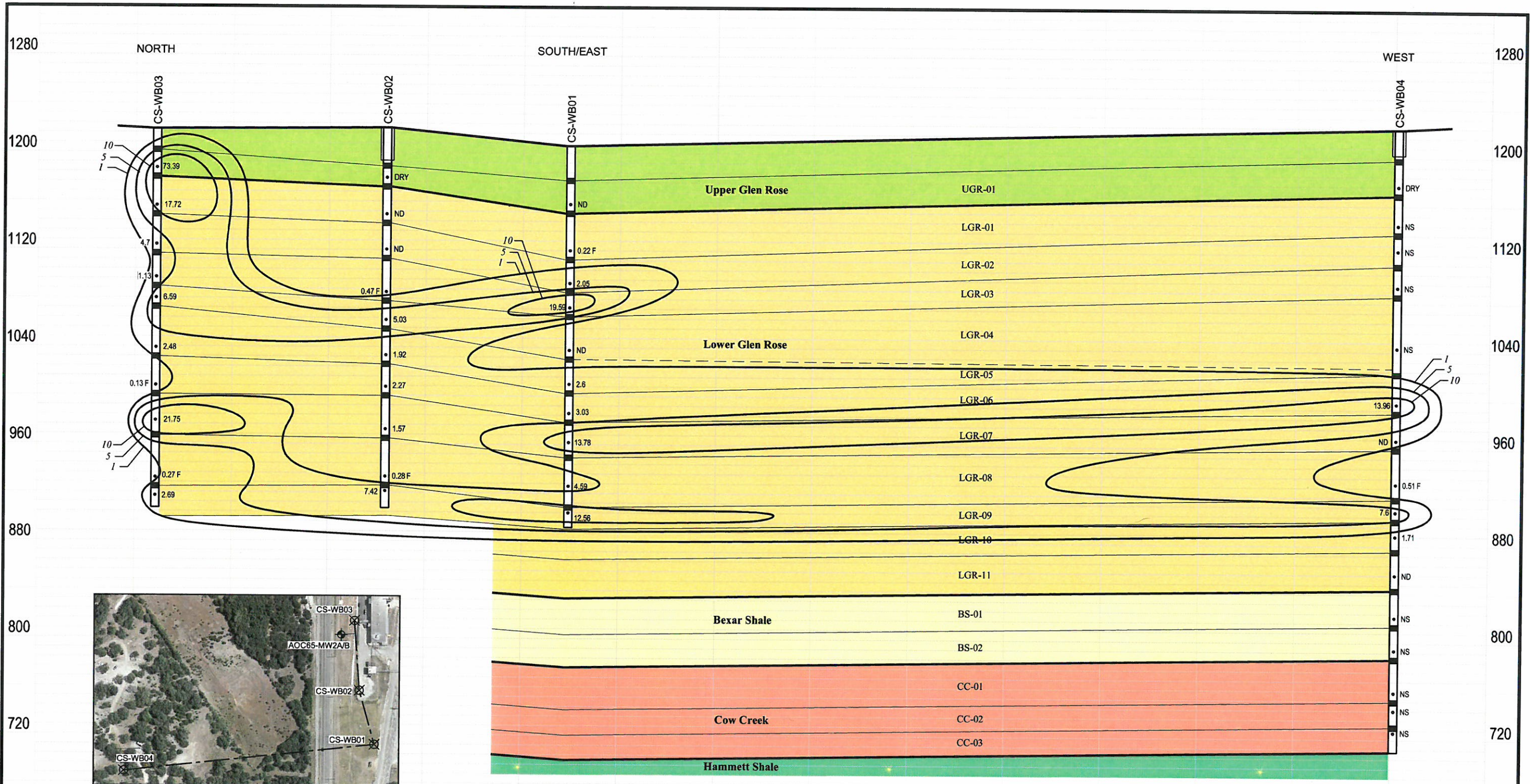
NS Not Sampled
ND Not Detected (MDL=0.06 µg/L)



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 ADRIA L. LINDLEY
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 5-22-17

Figure 2.5
 Vertical Distribution of PCE within
 Multi-port Wells - June 2016
 Camp Stanley Storage Activity, Texas

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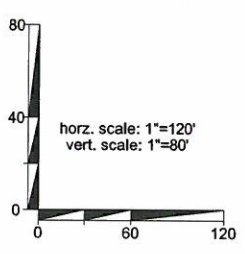


Index Map

Legend

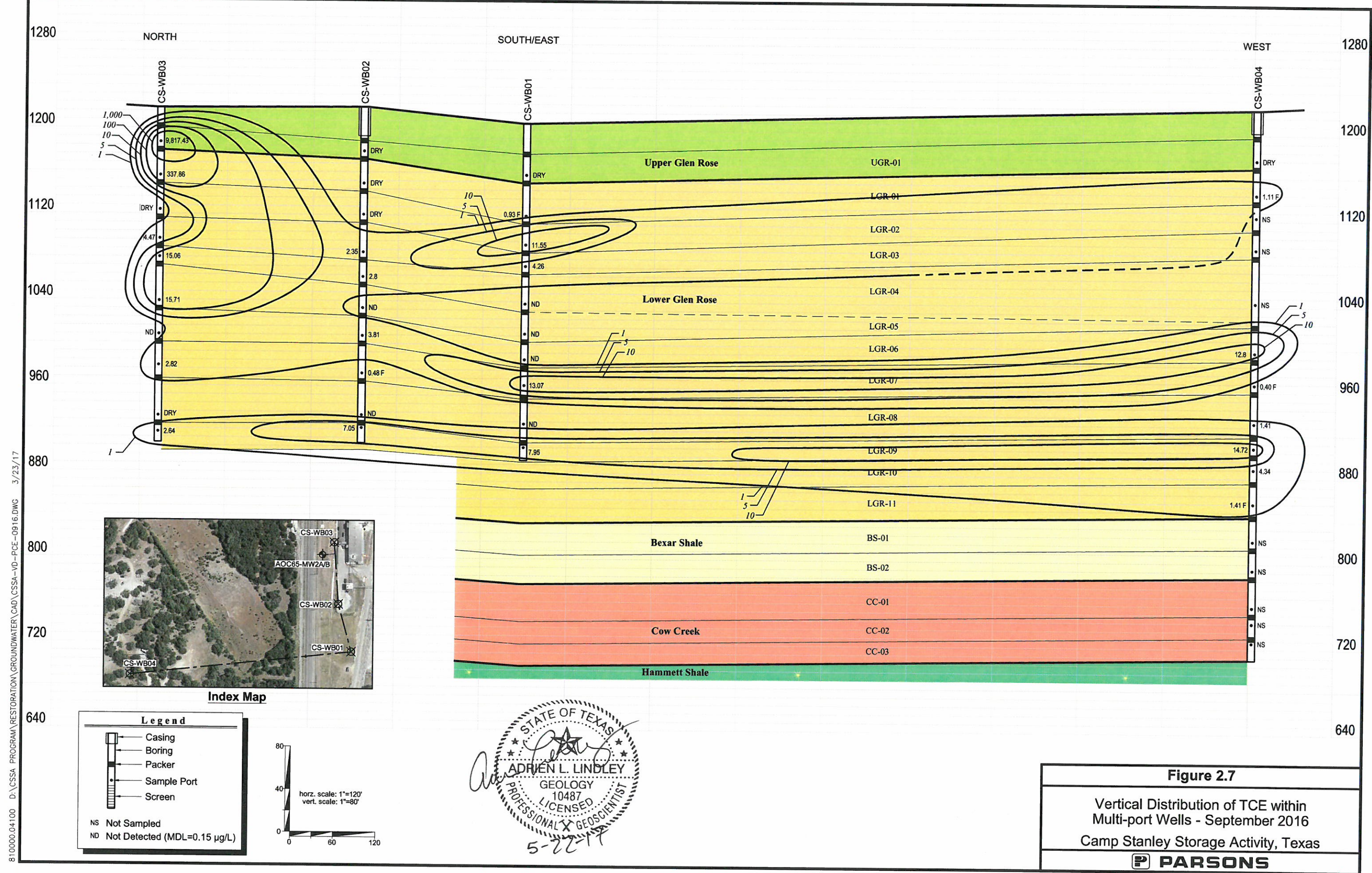
- Casing
- Boring
- Packer
- Sample Port
- Screen

NS Not Sampled
 ND Not Detected (MDL=0.15 µg/L)



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Figure 2.6
 Vertical Distribution of TCE within
 Multi-port Wells - June 2016
 Camp Stanley Storage Activity, Texas

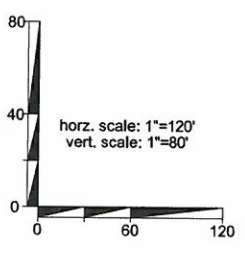


Index Map

Legend

- Casing
- Boring
- Packer
- Sample Port
- Screen

NS Not Sampled
ND Not Detected (MDL=0.15 µg/L)

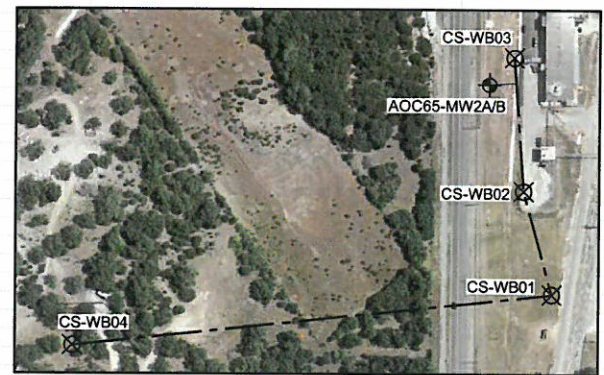
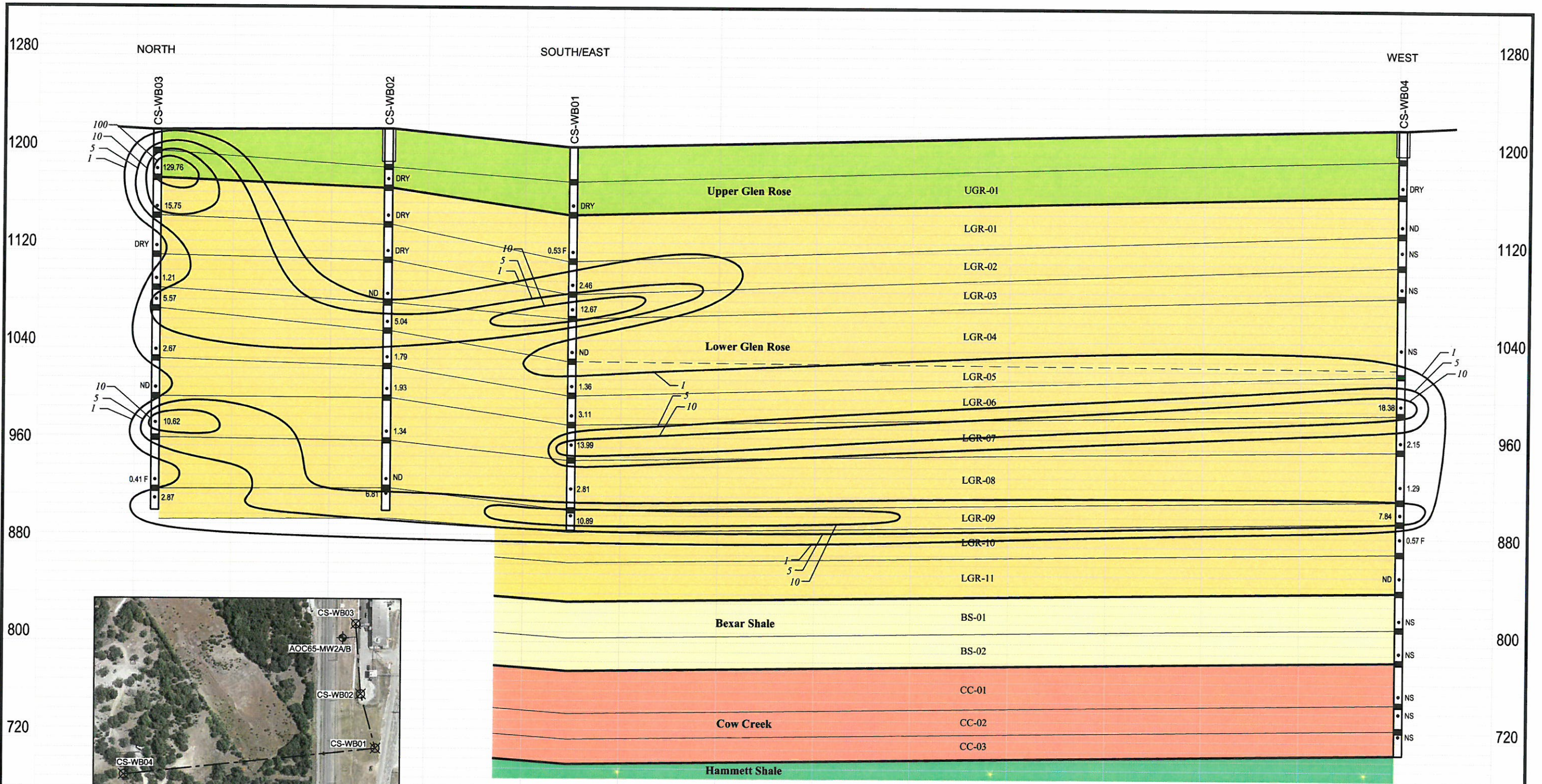


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Figure 2.7
 Vertical Distribution of TCE within Multi-port Wells - September 2016
 Camp Stanley Storage Activity, Texas
PARSONS

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810000.04100 D:\CSSA PROGRAM\RESTORATION\GROUNDWATER\CAD\CSSA-YD-TCE-0916.DWG 3/23/2017



Index Map

Legend

- Casing
- Boring
- Packer
- Sample Port
- Screen

NS Not Sampled
 ND Not Detected (MDL=0.15 µg/L)

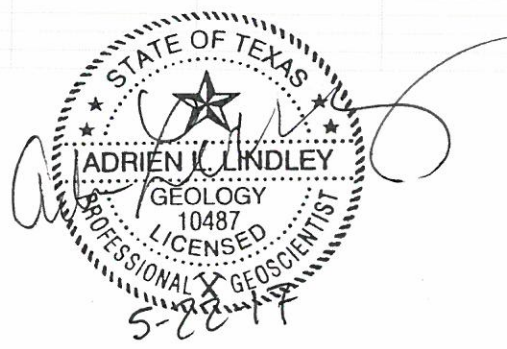
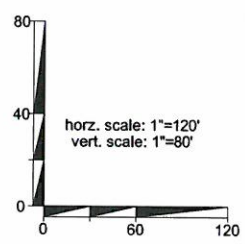


Figure 2.8
 Vertical Distribution of TCE within
 Multi-port Wells - September 2016
 Camp Stanley Storage Activity, Texas
PARSONS

to no contamination present. In 2011, only trace detections of *cis*-1,2-DCE were reported in CS-WB04-BS-02 and -CC-01 intervals. But in 2012, the trace detections also included PCE in all five BS (2) and CC (3) zones. In March 2014 one zone showed a trace detection of *cis*-1,2-DCE (0.69F µg/L) in the -CC-01 interval. In September 2015, PCE was again detected in all five -BS and -CC zones. Zone CC-03 reported its highest detection of PCE to date (6.66 µg/L), with levels now above the MCL. *Cis*-1,2-DCE was also detected in all 3 -CC zones in September 2015. The contention is that the trace contamination in the BS and CC at CS-WB04 is the result of the vertical mixing of contaminated LGR water within the nearby RFR-10 wellbore under a naturally downward vertical gradient. The last time VOCs have been seen distributed across most of the BS and CC zones was March 2009 and September 2012 when the aquifer was in a depressed condition.

CS-WB03 is located closest to the Building 90 source area, and consistently records the highest concentrations of contaminants (**Appendix D.3**). The upper zones (CS-WB03-LGR-01 and -LGR-02) are typically dry and have water only after significant rain. Because of frequent droughts and set sampling schedules, these zones have been sampled only a handful of times. In June 2016, these 3 uppermost intervals of CS-WB03 did contain water but by September the -LGR-02 zone was dry. Contamination is still present in the UGR zone with a significant decrease in concentration from September (23,737 µg/L) 2015 to June (7,443 µg/L) 2016. This level is well below the historical high concentration of 30,000 µg/L reported in March 2008. In June and September 2016, LGR-01 reported concentrations of PCE (314.33 and 337.86 µg/L) and TCE (17.22 and 15.75 µg/L) well above the MCLs. In December 2011, *cis*-1,2-DCE was detected in zone CS-WB03-LGR-06. Since then there have been eight consecutive detections increasing in concentration and levels have ranged from 0.25 to 8.87 µg/L. Zone -08 had no detection of PCE for the fourth consecutive time in the history of sampling this zone. Between February 2005 and September 2010, no *cis*-1,2-DCE had been reported in CS-WB03-LGR-09. Beginning in March 2011, a trace detection was reported in that zone, followed by thirteen consecutive sampling events that ranged in concentration between 0.20 µg/L and 45.73 µg/L. In 2016 no detections of *cis*-1,2-DCE were reported in this zone. At the same time, TCE detections have fallen and stayed below the MCL. Since March 2012 PCE has dropped below the MCL and has showed a steady decline through 2013. In 2016 PCE ranged from 1.94 to 2.64 µg/L. The reason for these changes is likely a result of a biodegradation mechanism.

Historical results indicate that a persistent source of contamination still exists, and that periodic flushing by intense rainfall can mobilize these perched contaminants that are probably otherwise bound to the matrix during the rest of the year. Likewise, preliminary indications from the ISCO treatability study show that solvent contamination was mobilized/oxidized as a result of the study. Baseline samples in the WB03-UGR zone were less than 6 µg/L in July 2012. Thirty days after the initial injection, PCE concentrations were above 6,000 µg/L, and persisted through September 2016. In 2016 the PCE concentrations in this zone dropped significantly to 7,443 µg/L in June and 9,817 µg/L in September, after spiking in September 2015 at 23,737 µg/L.

CS-WB02 was installed nearly 300 feet south of CS-WB03 and the Building 90 source area. In general most zones in 2016 showed PCE and TCE concentrations have remained constant since 2015 (**Appendix D.2**). The exception was the -LGR-09 zone that showed a

decrease in PCE from 14.18 µg/L (December 2015) to 7.05 µg/L (September 2016). Zones — LGR-01 and -LGR-02 were sampled in June 2016; these zones were dry in 2015. Both zones showed trace detections of PCE. Zone -LGR-05 reported its first detection of *cis*-1,2-DCE in September 2015; it was also present in June and September 2016. The changes over the last couple of years do not follow the historic pattern seen after the ISCO injections in August 2012 and May-June 2013 which showed a significant increase in PCE approximately 3-4 months after the ISCO injections. The result is interesting because it initially implicated that there is a vertical conduit between the shallower ISCO injection zones (trench gallery and injection wells) and the deeper strata of CS-WB02-LGR-09. In 2015 and 2016 this theory could be complicated by above average rainfall following a severe drought in the area.

Multi-port well CS-WB01 is located approximately 500 feet south of CS-WB03 and the Building 90 source area. Once again, for the zones that are normally saturated, historical PCE and TCE are present at concentrations less than 32 µg/L. Since mid-2005, there has been a general trend of increasing contaminant concentrations in zones CS-WB01-LGR-02 and -LGR-07. Initially, the -LGR-09 zone was following the same increasing trend beginning in 2005. In late 2009 the overall concentrations began decreasing until 2015 where they began an upward trend. In 2016 PCE and TCE concentrations began dropping again. These noted increases seem to correspond with increases observed in several upgradient CS-WB02 zones, and may be associated with a “flushing” event in which a slug of contaminated groundwater is moving downgradient away from the source zone (**Appendix D.1**). At CS-WB01, the trend has been that TCE concentrations generally exceed PCE for most zones. The zone with the relatively highest concentration is typically -LGR-09. Zones -05, -06, and -08 reported their highest detection of *cis*-1,2-DCE to date, with zone -LGR-08 showing the most significant increase. The results of CS-WB01 indicate that the contamination becomes preferentially stratified such that greater contamination is found above and below zones LGR-04, -05, and -06, to the south and west. No discernible effect from the ISCO treatability study has been ascertained at CS-WB01.

Off-post at CS-WB04, trace detections of less than 1 µg/L PCE are generally reported in the LGR-02, LGR-03, LGR-04, and LGR-08 zones. WB04-LGR-05 has never been sampled due to an erroneous sample port installation. Since September 2006, TCE has been reported above the MCL in zones LGR-06 and LGR-07 at concentrations less than 21 µg/L and PCE has been above the MCL since 2008. PCE in zone LGR-07 did fall back below the MCL in September 2015 and remained below the MCL in December 2015. In 2009, the concentration of PCE in both LGR-06 and LGR-07 more than doubled compared to September 2008 (**Appendix D.4**). In 2010, PCE in LGR-06 decreased from 33 µg/L to 11 µg/L while the LGR-07 PCE concentration decreased from 19 µg/L to 1.7 µg/L. But in 2011, the PCE concentration in LGR-06 increased to 28.76 µg/L PCE, and zone LGR-07 also increased its PCE concentration to 24.41 µg/L. In June 2013, the increasing trend continued with PCE reaching a historical high of 39.18 µg/L in LGR-06. The levels in LGR-07 dropped slightly in 2013 and the levels remained similar in June and September 2013. In 2014, the increasing PCE trend reappeared in LGR-06 reaching another historic high in December 2014 (44.92 µg/L). Zone LGR-07 mimicked the LGR-06 zone but reaching its PCE historic high in June 2014 (32.86 µg/L). In March 2015, both of these zones reached another historic high concentration (55.08 µg/L in the -06 zone and 35.6 µg/L in the -07 zone) for PCE. In 2016, *cis*-1,2-DCE reached a historic high in zone -LGR-07 (40.9 µg/L). These trends in LGR-06

and -07 are evident on the graphs presented in **Appendix D.4**. These two zones have been the most dynamic in change of all the multiport zones monitored in this program, and are an indication that contaminant mass is migrating westward in these intervals.

Historically, the off-post zone with the most persistent contamination is CS-WB04-LGR-09. Nearly equivalent levels of PCE and TCE are found at concentrations that generally range above the MCL between 8 µg/L and 16 µg/L. In September 2016, LGR-09 was at the high end of this range. Zones LGR-10 (PCE = 7.47 µg/L) and LGR-11 (PCE = 444.82 µg/L) reported their first detection above the MCL in March 2015. In 2016 these concentrations had dropped back below the MCL. Prior to September 2006, essentially no chlorinated solvents were detected in the CS-WB04-LGR-11 zone. Below this depth, any solvent contamination in the remainder of the BS and CC are at concentrations less than 2.0 µg/L. The only exception to this is zone CC-03 which reported PCE at 6.66 µg/L in September 2015.

The BS and CC zones are sampled on an 18-month schedule and were not sampled in 2013 or 2016 but were sampled in June 2014 and September 2015. These zones will move to a 30-month schedule in accordance with the 2015 update to the LTMO study and DQO's. Historically, the BS zones have essentially been contaminant-free, except for occurrences of *cis*-1,2-DCE (0.25 µg/L) in October 2007 and PCE (0.18 µg/L) in March 2009. Later, trace detections of PCE and *cis*-1,2-DCE were reported in both BS zones in September 2012 and September 2015. *Cis*-1,2-DCE is consistently reported in interval CC-01, with PCE also being reported in September 2015 at a historic high of 0.84 µg/L. Zone CC-02 also had a detection of PCE at the high end of its historic range (0.47 to 1.3 µg/L). In 2014 *cis*-1,2-DCE remained at trace levels in CC-01 and no other COC were detected in the CC zones. In 2015 zone CC-03 spiked with PCE at concentrations of 6.66 µg/L up from the 2012 concentration of 2.71 µg/L.

2.2.2 Off-Post Analytical Results

The frequencies for sampling off-post wells in 2016 were determined by the updated *Three-Tiered Long Term Monitoring Network Optimization Evaluation* (Parsons 2015), in compliance with *The Plan*, and *DQOs for the Groundwater Monitoring Program* (Parsons 2015). These plans were updated in 2015 and new sampling frequencies were implemented in September 2016 after receiving TCEQ and EPA approval. An overview of sampling frequencies for off-post wells is given in **Table 2.8**. Fifty-two off-post samples were collected from 20 wells during the 2016 quarterly monitoring events, and their locations are illustrated on **Figure 1.1**. Two wells (FO-J1 and I10-2) were not sampled in September 2016 due to pump outages. In September 2016 the 2015 updated LTMO study was implemented to sampling frequencies off-post. The TCEQ and EPA approval for implementing the LTMO off-post was received in April and May 2016 (see **Appendix I**).

Off-post wells sampled during the quarterly monitoring events were selected based on previous sampling results and proximity to both the CSSA boundary and wells with detections of PCE and TCE. Public and private supply wells located west and south of CSSA were selected for these events. Samples were also collected from the off-post well GAC filtration systems after treatment during the March and September events.

Off-post wells sampled in 2016 included (see **Figure 1.1** for well locations):

- One public well on Boerne Stage Road (BSR-04);
- One public well in the Hidden Springs Estates subdivision (HS-1);
- Two wells used by the general public along Interstate Highway 10 (I10-8 and I10-10);
- Four privately-owned wells in the Jackson Woods subdivision (JW-5, JW-7, JW-8, and JW-20);
- Five wells in the Leon Springs Villa area (two public supply wells removed from service: LS-1, and LS-4; and three privately-owned wells: LS-5, LS-6, and LS-7);
- One privately-owned well on Old Fredericksburg Road (OFR-3);
- Four privately-owned wells in the Ralph Fair Road area (RFR-10, RFR-11, RFR-12, and RFR-14);
- Two public supply wells from The Oaks Water Supply System (OW-HH2 and OW-BARNOWL);

**Table 2.8
2016 Off-Post Groundwater Sampling Rationale**

Well ID	2016				LTMO Sampling Frequency (as of June 2011)	LTMO Sampling Frequency (as of Sept. 2016)
	Mar	June	Sept	Dec		
BSR-03	NS	NS	NS	NS	9-month (snapshot)	exclude
BSR-04	NS	NS	NS	NS	9-month (snapshot)	exclude after Sept. 2017
FO-8	NS	NS	NS	NS	9-month (snapshot)	exclude
FO-17	NS	NS	NS	NS	9-month (snapshot)	exclude
FO-22	NS	NS	NS	NS	9-month (snapshot)	exclude
FO-J1	NS	NS	NA	NS	9-month (snapshot)	30 month
HS-1	NS	NS	NS	NS	9-month (snapshot)	exclude after Sept. 2017
HS-2	NS	NS	NS	NS	9-month (snapshot)	exclude
HS-3	NS	NS	NS	NS	9-month (snapshot)	exclude
I10-2	NS	NS	NA	NS	9-month (snapshot)	exclude after June 2018
I10-4	NA	NA	NA	NA	P&A	P&A
I10-5	NS	NS	NS	NS	9-month (snapshot)	exclude
I10-7	NS	NS	NS	NS	9-month (snapshot)	exclude
I10-8	NS	NS	NS	NS	9-month (snapshot)	30 month
I10-10	NS	NS	NS	NS	One time sample	added to replace LS-1
JW-5	NS	NS	NS	NS	9-month (snapshot)	exclude after March 2016
JW-6	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-7	NS	NS	NS	NS	9-month (snapshot)	30 month
JW-8	NS	NS	NS	NS	9-month (snapshot)	30 month
JW-9	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-12	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-13	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-14	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-15	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-20	NS	NS	NS	NS	9-month (snapshot)	exclude after Sept. 2018
JW-26	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-27	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-28	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-29	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-30	NS	NS	NS	NS	9-month (snapshot)	exclude
JW-31	NS	NS	NS	NS	9-month (snapshot)	exclude
LS-1	NS	NS	NS	NS	9-month (snapshot)	scheduled to be P&A
LS-4	NS	NS	NS	NS	9-month (snapshot)	scheduled to be P&A
LS-5					Quarterly	Quarterly
LS-5-A2	NS	NS	NS	NS	Biannually (Mar & Sept)	Biannually (Mar & Sept)
LS-6					Quarterly	Quarterly
LS-6-A2	NS	NS	NS	NS	Biannually (Mar & Sept)	Biannually (Mar & Sept)
LS-7					Quarterly	Quarterly
LS-7-A2	NS	NS	NS	NS	Biannually (Mar & Sept)	Biannually (Mar & Sept)
OFR-1	NA	NA	NA	NA	P&A	P&A
OFR-3					Quarterly	Quarterly
OFR-3-A2	NS	NS	NS	NS	Biannually (Mar & Sept)	Biannually (Mar & Sept)
OFR-4	NA	NA	NA	NA	P&A	P&A
OW-HH1	NS	NS	NS	NS	9-month (snapshot)	exclude
OW-HH2	NS	NS	NS	NS	9-month (snapshot)	exclude after March 2016
OW-CE1	NS	NS	NS	NS	9-month (snapshot)	exclude
OW-CE2	NS	NS	NS	NS	9-month (snapshot)	exclude
OW-MT2	NS	NS	NS	NS	9-month (snapshot)	exclude
OW-BARNOWL	NS	NS	NS	NS	9-month (snapshot)	exclude after March 2016
OW-DAIRYWELL	NS	NS	NS	NS	9-month (snapshot)	exclude
OW-HH3	NS	NS	NS	NS	9-month (snapshot)	exclude
RFR-3	NS	NS	NS	NS	9-month (snapshot)	exclude
RFR-4	NS	NS	NS	NS	9-month (snapshot)	exclude
RFR-5	NS	NS	NS	NS	9-month (snapshot)	exclude
RFR-8	NS	NS	NS	NS	9-month (snapshot)	exclude
RFR-9	NS	NS	NS	NS	9-month (snapshot)	exclude
RFR-10					Quarterly	Quarterly
RFR-10-A2	NS	NS	NS	NS	Biannually (Mar & Sept)	Biannually (Mar & Sept)
RFR-10-B2	NS	NS	NS	NS	Biannually (Mar & Sept)	Biannually (Mar & Sept)
RFR-11					Quarterly	Quarterly
RFR-11-A2	NS	NS	NS	NS	Biannually (Mar & Sept)	Biannually (Mar & Sept)
RFR-12	NS	NS	NS	NS	9-month (snapshot)	15 months
RFR-13	NA	NA	NA	NA	electricity off	exclude
RFR-14	NS	NS	NS	NS	9-month (snapshot)	30 month
SLD-01	NS	NS	NS	NS	9-month (snapshot)	exclude
SLD-02	NS	NS	NS	NS	9-month (snapshot)	exclude

VOCs detected are greater than 90% of the MCL. Sample monthly; quarterly after GAC installation.

VOCs detected are greater than 80% of the MCL. The well will be placed on a monthly sampling schedule until GAC installation then quarterly sampling after GAC installation.

VOCs detected are less than 80% of the MCL (<4.0 ppb and >0.06 ppb for PCE & <4.0 ppb >0.05 ppb for TCE). After four quarters of stable results the well can be removed from quarterly sampling.

No VOCs detected. Sample on an as needed basis.

This well has a GAC filtration unit installed by CSSA.
A1 - after GAC canister #1
A2 - after GAC canister #2

NS Not sampled for that event.

NA Not applicable, sample could not be collected.

- All wells were sampled from a tap located as close to the wellhead as possible. Most taps were installed by CSSA to obtain a representative groundwater sample before pressurization, storage, or the water supply distribution system. Water was purged to engage the well pump prior to sample collection. Conductivity, pH, and temperature readings were recorded to confirm adequate purging while the well was pumping. Purging measurements were recorded in the field logbook for each sampling event.
- All groundwater samples were submitted to APPL for analysis. Groundwater samples were analyzed for the short list of VOCs (*cis*-1,2-DCE, *trans*-1,2-DCE, 1,1-DCE, PCE, TCE, and vinyl chloride) using SW-846 Method 8260B in March and June. Starting September 2016 the updated LTMO study and DQO's modified this list dropping *trans*-1,2-DCE and 1,1-DCE from the analysis. Off-post wells are not analyzed for metals as part of the groundwater monitoring program.
- The data packages containing the analytical results for the 2016 sampling events were reviewed and verified according to the guidelines outlined in the CSSA QAPP. After the data packages were received by Parsons, quarterly DVRs were submitted to CSSA as an attachment in the Quarterly Groundwater Reports. The December 2016 DVRs are included in **Appendix H**.
- Based on historical detections, the lateral extent of VOC contamination above the MDL extends approximately 2.7 miles beyond the west boundary of CSSA (well SLD-01) and 0.4 miles to the south of CSSA (well LS-4). Information such as well depth, pump depth, and other pertinent data necessary to characterize the vertical extent of migration is not readily available for most off-post wells. However, the typical well construction for the area is open borehole completions that penetrate the full thickness of the Middle Trinity aquifer (LGR, BS, and CC).
- Concentrations of VOCs detected in 2016 are presented in **Table 2.9**. Full analytical results from the 2016 sampling events are presented in **Appendix F**. Concentration trends are illustrated on **Figures 2.9 and 2.10** for wells LS-5, LS-6, LS-7, OFR-3, RFR-10, and RFR-11 for PCE and TCE. These wells were selected because they have had detections of PCE and TCE that approach and/or exceed MCLs. **Figure 2.10** includes precipitation data from the weather stations located at CSSA, AOC-65 WS and B-3 WS. This figure suggests VOC concentrations in OFR-3 and RFR-10 are very sensitive to significant rain events and that VOC concentrations in LS-5, LS-6, and LS-7 are less sensitive to rainfall.
- Data from RFR-11 presents a mixed picture. From October 2001 through December 2007, RFR-11 VOC concentration peaks showed a good correlation to significant rainfall events, but after 2007, this correlation is less pronounced. It may be coincidental, but the changes in rainfall/VOC concentration correlations in RFR-11 happened when the San Antonio Water System (SAWS) abandoned pumping of the Bexar Met public supply wells in Leon Springs Villas (LS-1, LS-2, LS-3, LS-4). **Figure 2.10** shows PCE and TCE concentrations with monthly water usage at each off-post well. The off-post GAC systems are equipped with flowmeters that track the gallons of water treated by the units. Data in this figure suggests little correlation between VOC concentrations and well pumping volumes.

Table 2.9
2016 Off-Post Groundwater COCs Analytical Results

Well ID	Laboratory	Analytical Method	Sample Date	1,1-Dichloroethene (ug/L)	cis -1,2-Dichloroethene (ug/L)	trans -1,2-Dichloroethene (ug/L)	Tetra-chloroethene (ug/L)	Trichloroethene (ug/L)	Vinyl chloride (ug/L)
Laboratory Detection Limits & Maximum Contaminant Level									
Method Detection Limit (MDL)				0.12	0.07	0.08	0.06	0.05	0.08
Reporting Limit (RL)				1.2	1.2	0.6	1.4	1	1.1
Max. Contaminant Level (MCL)				7	70	100	5	5	2
BSR-04	APPL	SW8260B	9/14/2016	NA	--	NA	--	--	--
HS-1	APPL	SW8260B	9/7/2016	NA	--	NA	--	--	--
I10-8	APPL	SW8260B	9/14/2016	NA	--	NA	--	--	--
<i>Duplicate</i>	APPL	SW8260B	9/14/2016	NA	--	NA	--	--	--
I10-10	APPL	SW8260B	9/7/2016	NA	--	NA	--	--	--
JW-5	APPL	SW8260B	9/12/2016	NA	--	NA	--	--	--
JW-7	APPL	SW8260B	9/8/2016	NA	--	NA	--	--	--
JW-8	APPL	SW8260B	9/8/2016	NA	--	NA	--	--	--
JW-20	APPL	SW8260B	9/8/2016	NA	--	NA	--	--	--
LS-1	APPL	SW8260B	9/7/2016	NA	--	NA	0.25F	--	--
LS-4	APPL	SW8260B	9/7/2016	NA	--	NA	0.16F	--	--
LS-5	APPL	SW8260B	3/7/2016	--	--	--	1.12F	2.5	--
	APPL	SW8260B	6/6/2016	--	--	--	0.88F	1.79	--
	APPL	SW8260B	9/6/2016	NA	--	NA	0.75F	1.85	--
	APPL	SW8260B	12/5/2016	NA	--	NA	1.06F	2.16	--
LS-5-A2	APPL	SW8260B	3/7/2016	--	--	--	--	--	--
	APPL	SW8260B	9/6/2016	NA	--	NA	--	--	--
LS-6	APPL	SW8260B	3/7/2016	--	--	--	0.76F	1.47	--
	APPL	SW8260B	6/6/2016	--	--	--	0.72F	0.89F	--
	APPL	SW8260B	9/6/2016	NA	--	NA	0.88F	--	--
	APPL	SW8260B	12/5/2016	NA	--	NA	--	--	--
LS-6-A2	APPL	SW8260B	3/7/2016	--	--	--	--	--	--
	APPL	SW8260B	9/6/2016	NA	--	NA	--	--	--
LS-7	APPL	SW8260B	3/7/2016	--	--	--	1.63	0.28F	--
	APPL	SW8260B	6/6/2016	--	--	--	0.62F	--	--
	APPL	SW8260B	9/6/2016	NA	--	NA	0.57F	--	--
	APPL	SW8260B	12/5/2016	NA	--	NA	--	--	--
LS-7-A2	APPL	SW8260B	3/7/2016	--	--	--	--	--	--
	APPL	SW8260B	9/6/2016	NA	--	NA	--	--	--
OFR-3	APPL	SW8260B	3/7/2016	--	--	--	2.86	2.38	--
	APPL	SW8260B	6/6/2016	--	--	--	3.16	3.02	--
	APPL	SW8260B	6/6/2016	--	--	--	3.34	3.03	--
	APPL	SW8260B	9/6/2016	NA	--	NA	3.14	2.02	--
	APPL	SW8260B	12/5/2016	NA	--	NA	6.59	3.02	--
OFR-3-A2	APPL	SW8260B	3/7/2016	--	--	--	--	--	--
	APPL	SW8260B	9/6/2016	NA	--	NA	--	--	--
OW-BARNOWL	APPL	SW8260B	9/8/2016	NA	--	NA	--	--	--
OW-HH2	APPL	SW8260B	9/8/2016	NA	--	NA	--	--	--
RFR-10	APPL	SW8260B	3/7/2016	--	0.18F	--	13.85	7.4	--
	APPL	SW8260B	3/7/2016	--	--	--	13.33	6.76	--
	APPL	SW8260B	4/4/2016	--	0.17F	--	11.89	6.73	--
	APPL	SW8260B	5/3/2016	--	--	--	6.53	4.48	--
	APPL	SW8260B	6/6/2016	--	--	--	7.70	4.90	--
	APPL	SW8260B	9/6/2016	NA	0.18F	NA	6.95	4.27	--
	APPL	SW8260B	12/5/2016	NA	--	NA	7.99	3.62	--
RFR-10-HKT	APPL	SW8260B	4/1/2016	--	--	--	--	--	--
RFR-10-TKT	APPL	SW8260B	4/1/2016	--	--	--	--	--	--
RFR-10-TANK	APPL	SW8260B	4/4/2016	--	--	--	--	--	--
RFR-10-A1	APPL	SW8260B	4/4/2016	--	--	--	--	--	--
RFR-10-A2	APPL	SW8260B	3/7/2016	--	0.17F	--	10.38	6.41	--
	APPL	SW8260B	4/4/2016	--	--	--	--	--	--
	APPL	SW8260B	5/3/2016	--	--	--	--	--	--
	APPL	SW8260B	9/6/2016	NA	--	NA	--	--	--
	APPL	SW8260B	9/6/2016	NA	--	NA	--	--	--
RFR-10-B1	APPL	SW8260B	4/4/2016	--	--	--	--	--	--
RFR-10-B2	APPL	SW8260B	3/7/2016	--	--	--	--	--	--
	APPL	SW8260B	4/4/2016	--	--	--	--	--	--
	APPL	SW8260B	5/3/2016	--	--	--	--	--	--
	APPL	SW8260B	9/6/2016	NA	--	NA	--	--	--
RFR-11	APPL	SW8260B	3/7/2016	--	--	--	0.96F	1.62	--
	APPL	SW8260B	6/6/2016	--	--	--	0.94F	0.30F	--
	APPL	SW8260B	9/6/2016	NA	--	NA	1.49	0.47F	--
	APPL	SW8260B	12/5/2016	NA	--	NA	0.91F	1.28	--

Table 2.9
2016 Off-Post Groundwater COCs Analytical Results

Well ID	Laboratory	Analytical Method	Sample Date	1,1-Dichloroethene (ug/L)	<i>cis</i> -1,2-Dichloroethene (ug/L)	<i>trans</i> -1,2-Dichloroethene (ug/L)	Tetrachloroethene (ug/L)	Trichloroethene (ug/L)	Vinyl chloride (ug/L)
Laboratory Detection Limits & Maximum Contaminant Level									
Method Detection Limit (MDL)				0.12	0.07	0.08	0.06	0.05	0.08
Reporting Limit (RL)				1.2	1.2	0.6	1.4	1	1.1
Max. Contaminant Level (MCL)				7	70	100	5	5	2
RFR-11-A2	APPL	SW8260B	3/7/2016	--	--	--	--	--	--
	APPL	SW8260B	9/6/2016	NA	--	NA	--	--	--
RFR-12	APPL	SW8260B	9/7/2016	NA	--	NA	--	0.49F	--
RFR-14	APPL	SW8260B	9/8/2016	NA	--	NA	--	--	--
<i>Duplicate</i>	APPL	SW8260B	9/8/2016	NA	--	NA	--	--	--

BOLD	≥ MDL
BOLD	≥ RL
BOLD	≥ MCL

All samples were analyzed by APPL, Inc.
VOC data reported in ug/L.
Abbreviations/Notes:
Duplicate Field Duplicate
TCE Trichloroethene
PCE Tetrachloroethene
DCE Dichloroethene
-- non detect

Data Qualifiers
U-The analyte was analyzed for, but not detected. The associated numerical value is at or below the MDL.
F-The analyte was positively identified but the associated numerical value is below the RL.

Table 2.9
2016 Off-Post Groundwater COCs Analytical Results

Analyte	Sample ID:		LS-7	LS-7-A2	LS-7-SHOWER TAP
	Sample Date:		12/30/2016	12/30/2016	12/30/2016
	MDL	RL	Results	Results	Results
1,1,1,2-TETRACHLOROETHANE	0.09	0.5	--	--	--
1,1,1-TCA	0.03	0.8	--	--	--
1,1,2,2-TETRACHLOROETHANE	0.07	0.4	--	--	--
1,1,2-TCA	0.06	1.0	--	--	--
1,1-DCA	0.07	0.4	--	--	--
1,1-DCE	0.12	1.2	--	--	--
1,1-DICHLOROPROPENE	0.10	1.0	--	--	--
1,2,3-TRICHLOROBENZENE	0.24	0.3	--	--	--
1,2,3-TRICHLOROPROPANE	0.17	3.2	--	--	--
1,2,4-TRICHLOROBENZENE	0.16	0.4	--	--	--
1,2,4-TRIMETHYLBENZENE	0.04	1.3	--	--	--
1,2-DCA	0.05	0.6	--	--	--
1,2-DCB	0.02	0.3	--	--	--
1,2-DIBROMO-3-CHLOROPROPANE	0.76	2.6	--	--	--
1,2-DICHLOROPROPANE	0.06	0.4	--	--	--
1,2-EDB	0.06	0.6	--	--	--
1,3,5-TRIMETHYLBENZENE	0.04	0.5	--	--	--
1,3-DCB	0.03	1.2	--	--	--
1,3-DICHLOROPROPANE	0.05	0.4	--	--	--
1,4-DCB	0.07	0.3	--	--	--
1-CHLOROHEXANE	0.04	0.5	--	--	--
2,2-DICHLOROPROPANE	0.10	3.5	--	--	--
2-CHLOROTOLUENE	0.04	0.4	--	--	--
4-CHLOROTOLUENE	0.04	0.6	--	--	--
BENZENE	0.07	0.4	--	--	--
BROMOBENZENE	0.06	0.3	--	--	--
BROMOCHLOROMETHANE	0.11	0.4	--	--	--
BROMODICHLOROMETHANE	0.06	0.8	--	--	--
BROMOFORM	0.13	1.2	--	--	--
BROMOMETHANE	0.08	1.1	--	--	--
CARBON TETRACHLORIDE	0.06	2.1	--	--	--
CHLOROENZENE	0.04	0.4	--	--	--
CHLOROETHANE	0.07	1.0	--	--	--
CHLOROFORM	0.06	0.3	--	--	--
CHLOROMETHANE	0.16	1.3	--	--	--
CIS-1,2-DCE	0.07	1.2	--	--	--
CIS-1,3-DICHLOROPROPENE	0.03	1.0	--	--	--
DIBROMOCHLOROMETHANE	0.06	0.5	--	--	--
DIBROMOMETHANE	0.06	2.4	--	--	--
DICHLORODIFLUOROMETHANE	0.11	1.0	--	--	--
ETHYLBENZENE	0.05	0.6	--	--	--
HEXACHLOROBUTADIENE	0.17	1.1	--	--	--
ISOPROPYLBENZENE	0.04	0.5	--	--	--
M&P-XYLENE	0.07	0.5	--	--	--
METHYLENE CHLORIDE	0.35	1.0	--	--	--
N-BUTYLBENZENE	0.17	1.1	--	--	--
N-PROPYLBENZENE	0.03	0.4	--	--	--
NAPHTHALENE	0.07	0.4	--	--	--
O-XYLENE	0.06	1.1	--	--	--
P-ISOPROPYLTOLUENE	0.05	1.2	--	--	--
SEC-BUTYLBENZENE	0.05	1.3	--	--	--
STYRENE	0.08	0.4	--	--	--
TCE	0.05	1.0	0.24F	--	--
TERT-BUTYLBENZENE	0.04	1.4	--	--	--
TETRACHLOROETHENE	0.06	1.4	0.97F	--	--
TOLUENE	0.06	1.1	--	--	--
TRANS-1,2-DCE	0.08	0.6	--	--	--
TRANS-1,3-DICHLOROPROPENE	0.04	1.0	--	--	--
TRICHLOROFLUOROMETHANE	0.07	0.8	--	--	--
VINYL CHLORIDE	0.08	1.1	--	--	--

BOLD	≥ MDL
BOLD	≥ RL
BOLD	≥ MCL

Table 2.9
2016 Off-Post Groundwater COCs Analytical Results

All samples were analyzed by APPL, Inc.

VOC data reported in ug/L.

Abbreviations/Notes:

Duplicate Field Duplicate

TCE Trichloroethene

PCE Tetrachloroethene

DCE Dichloroethene

-- non detect

Data Qualifiers

U-The analyte was analyzed for, but not detected. The associated numerical value is at or below the MDL.

F-The analyte was positively identified but the associated numerical value is below the RL.

Figure 2.9
PCE and TCE Concentration Trends and Precipitation

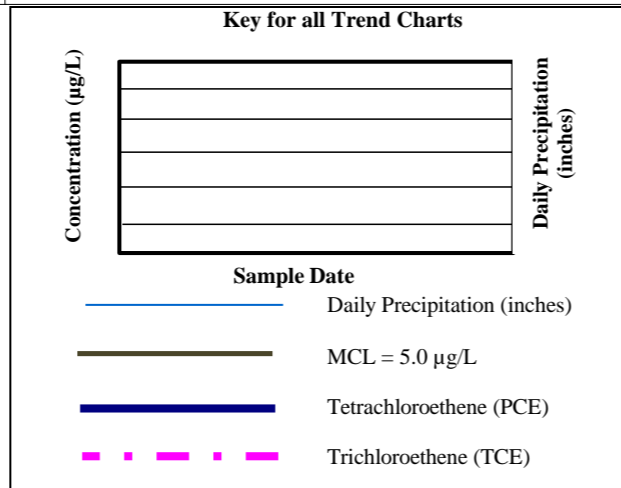
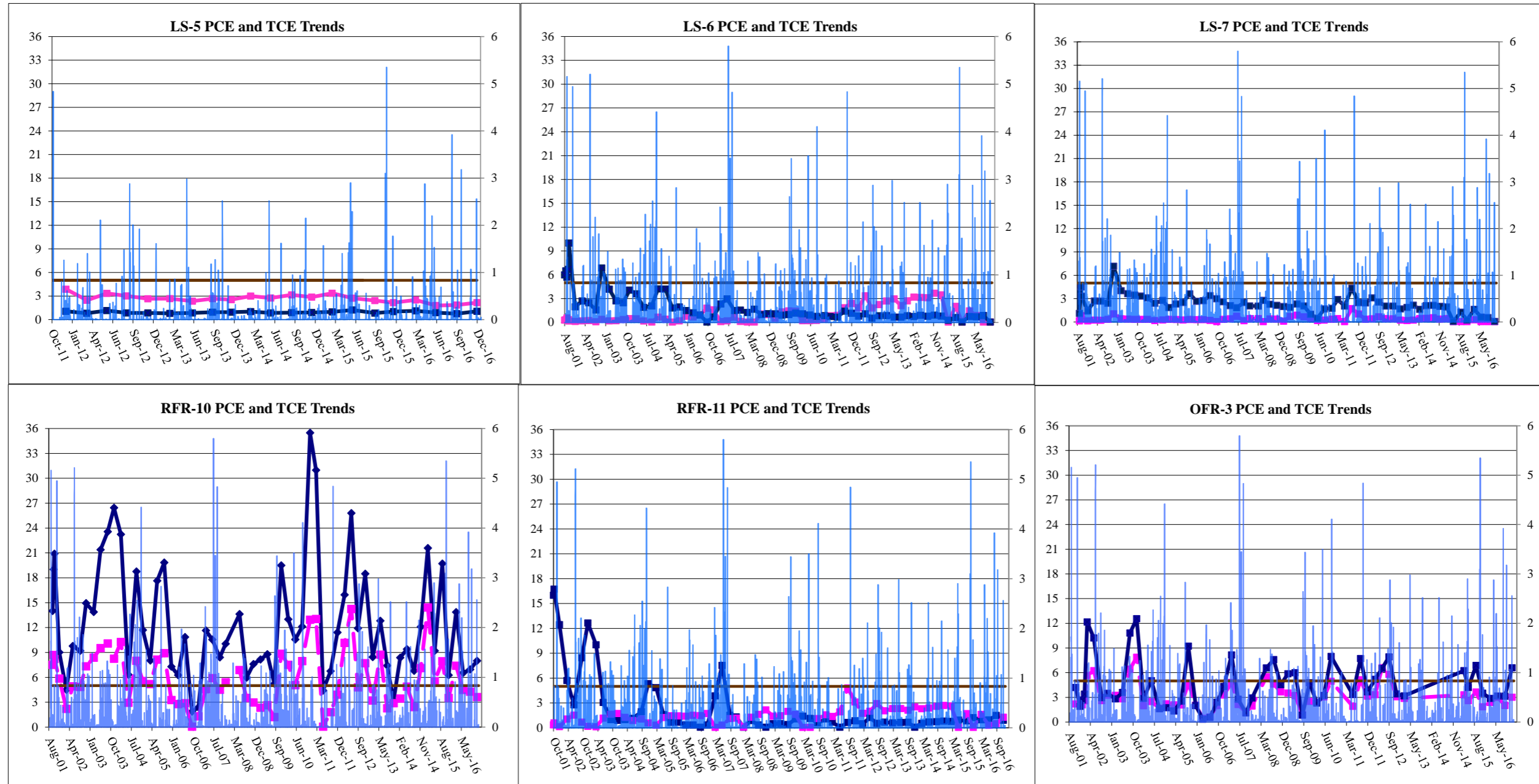
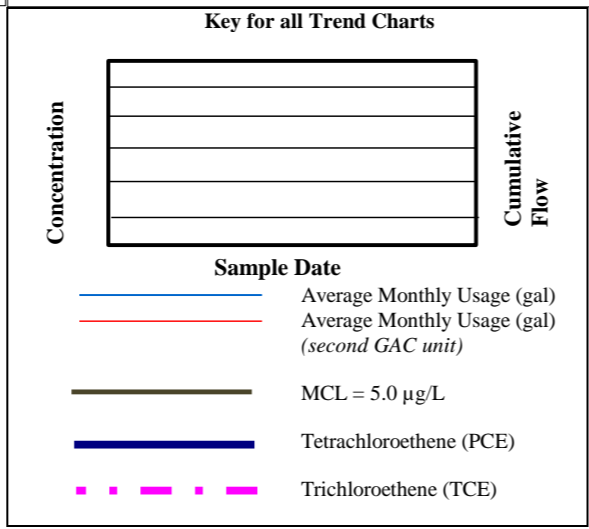
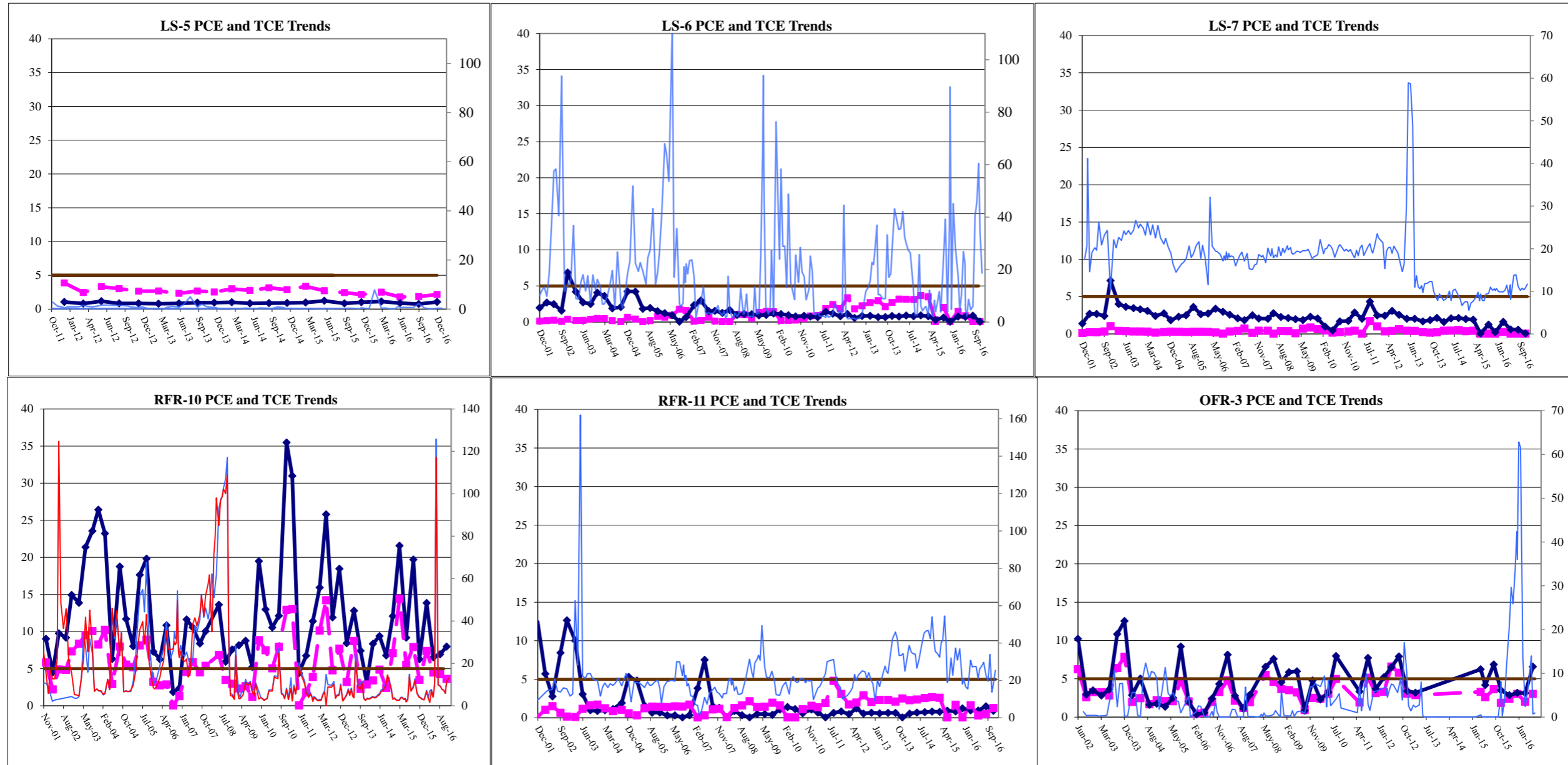


Figure 2.10
PCE and TCE Concentration Trends and Monthly Water Usage



2.2.2.1 Off-Post Wells with COC Detections above the MCL

During 2016, off-post wells RFR-10 and OFR-3 had raw water (pre-GAC) concentrations exceeding the MCL. Well RFR-10 concentrations exceeded the MCL for PCE during all 2016 sampling events and TCE also exceeded the MCL during the March and April. Well OFR-3 exceeded the MCL for PCE during the December event. An evaluation of concentration trends through 2016 are included in **Figures 2.9 and 2.10**.

2.2.2.2 GAC Filtration Systems

All off-post drinking water wells that historically exceeded or approached MCLs have already been equipped with GAC filtration systems. These wells, and the date the filtration system was installed, are listed in **Table 2.10**. CSSA maintains and operates these GAC filtration systems at no cost or inconvenience to the well owners.

Table 2.10 GAC Filtration Systems Installed

Well	Date Installed
LS-6	August 2001
LS-7	August 2001
OFR-3	April 2002
RFR-10	October 2001
RFR-11	October 2001
LS-5	October 2011

Semi-annual post-GAC confirmation samples are collected from all wells equipped with GAC filtration systems (**Appendix G**). The samples confirm that the GAC filtration systems are working effectively and that VOCs are reduced to concentrations below the applicable drinking water MCLs.

In March 2016, GAC-filtered sample RFR-10-A2 reported detections of PCE and TCE above the MCL. This particular GAC has 2 systems that run in parallel, and upon receipt of results, the A side of the system was immediately shut down. Additional samples were collected from both home faucets, no VOCs were detected in these samples. Carbonair exchanged both carbon canisters on side A and additional samples were collected to ensure the GAC was functioning properly before it was put back into service. All samples were non-detect. The other 5 GAC systems reported GAC-filtered samples as non-detect in March and September 2016. GAC filtered samples are collected semiannually (March and September) in accordance with project DQOs. See **Appendix G** for pre- and post-GAC sample comparisons.

Regular GAC maintenance/inspection occurs every 3 weeks. This task includes changing pre-filters and troubleshooting problems occurring with the systems. On February 18, 2016 and September 6, 2016 the carbon in the GAC filtration systems (LS-5, LS-6, LS-7, RFR-10, OFR-3, and RFR-11) was changed out.

2.2.2.3 Off-Post Wells with COC Detections below the MCL

Detections from all wells sampled off-post are presented in **Table 2.9** and complete 2016 results are included in **Appendix F**. The groundwater monitoring results include wells where COCs were detected at levels below applicable MCLs. These detections occurred in wells LS-5, LS-6, LS-7, and RFR-11. The detections below the MCL and above the RL are summarized as follows:

- **LS-5** – Concentration of TCE exceeded the RL in March, June, September, and December 2016. PCE was also detected below the RL during these sampling events. This well is equipped with a GAC filtration system.
- **LS-6** – Concentrations of TCE exceeded the RL in March then dropped below the RL in June 2016. PCE was detected in March, June, and September as well but below the RL. This well is equipped with a GAC filtration system.
- **LS-7** – Concentrations of PCE exceeded the RL in March 2016 but fell below the RL during the June and September sampling events. Concentrations of TCE were also present in March but below the RL. This well is equipped with a GAC filtration system.
- **RFR-11** - Concentration of TCE exceeded the RL in the March and December and was below the RL during the June and September quarterly sampling events. PCE was also detected above the RL in September but below the RL in March, June, and December sampling events. This well is equipped with a GAC filtration system.

2.2.2.4 Off-Post Wells with COC Detections below the Reporting Limits

The off-post results include detections in wells for which the analyte is identified, but at a concentration below the RL. These results are assigned an “F” flag under the CSSA QAPP. In 2016, this included wells LS-1, LS-4, and RFR-12. The detections below the reporting limit are summarized as follows:

- **LS-1** – Concentrations of PCE detected below the RL in September 2016.
- **LS-4** - Concentrations of PCE detected below the RL in September 2016.
- **RFR-12** – Concentrations of TCE detected below the RL in September 2016.

2.2.3 Isoconcentration Mapping

2.2.3.1 PCE, TCE, and cis-1,2-DCE

In annual reports prior to 2010, the maximum concentration detected during any quarterly event in the LGR wells (on-post and off-post) were contoured into isoconcentration contour maps for PCE, TCE, and *cis*-1,2-DCE. The reason for creating these “composite” maps resulted from the LTMO sampling frequency enacted in 2005. No single quarterly event included all of the wells in the sampling program. The LTMO program was updated in 2010 to include a “snapshot” sampling event in which all on- and off-post wells were sampled during the same event. These snapshot events began in September 2010, and occurred every 9 months. The 2015 update to the LTMO provides for a complete snapshot every 30 months with less inclusive events occurring every 15 months. The transition from the old to the new LTMO schedule began in late 2015 and the new LTMO schedule will be fully implemented in

June of 2017. A final 9-month snapshot was completed in September 2016, and the results were utilized in generating plume isoconcentration contour maps. Annual reports now only include isoconcentration maps of contaminants collected during a single sampling event.

Another development in the representation of contamination in groundwater came in March 2012. At the direction of the USEPA (**Appendix J**), isoconcentration maps depicting groundwater contamination will no longer present isoconcentration contour lines below the laboratory RL, which is considered quantifiable data. Trace detections of contamination (F-flagged) data reported by the lab are considered qualitative results and therefore are not suitable for demonstrating the extent of contaminant plumes. Results below the RL are still presented on the maps, but are not contained within an isoconcentration contour line. For the compounds reported, the RL (and lowest isoconcentration line) are as follows: *cis*-1,2-DCE (1.2 µg/L), PCE (1.4 µg/L), and TCE (1.0 µg/L).

To better represent the plume source areas, data from deepest LGR zone of the Westbay wells were also composited into the isoconcentration maps. The LGR-09 zone from Westbay wells CS-WB01 through CS-WB04 were sampled in June and September 2016 and are included in the maps to help delineate Plume 2. The LGR-04 zone of Westbay wells CS-WB05 through CS-WB08 were sampled in December 2016 as part of the SWMU B-3 Bioreactor operations, and assist in delineating the central portion of Plume 1. These isoconcentration maps are provided for September 2016 in **Figures 2.11, 2.12, and 2.13** to illustrate the extent of contamination as measured and inferred from analytical results.

The 2016 extent of COCs above the RL (approximately 1 µg/L) for each of PCE, TCE and *cis*-1,2-DCE can be determined by reviewing the set of figures generated for September 2016. September 2016 PCE concentrations above 1.4 µg/L are detected on-post in wells CS-D, CS-MW1-LGR, CS-MW5-LGR, CS-MW8-LGR, CS-MW10-LGR, CS-MW20-LGR, CS-MW36-LGR, B3-EXW01 and B3-EXW02. Additionally, the LGR-09 zone from CS-WB01, CS-WB02, and CS-WB03 and the LGR-04 zones from CS-WB05 through CS-WB07 are all above the PCE RL of 1.4 µg/L (**Figure 2.11**). Off-post detections of PCE above 1.4 µg/L include OFR-3, RFR-10, RFR-11 and CS-WB04-LGR-09.

TCE follows a similar pattern in September 2016, and has been detected above 1.0 µg/L in Plume 1 wells CS-D, CS-MW1-LGR, CS-MW5-LGR, CS-MW36-LGR, and B3-EXW01 B3-EXW-02, and B3-EXW04. Additionally, the LGR-04 zones from CS-WB05 through CS-WB08 are all above 1.0 µg/L TCE (**Figure 2.12**). The LGR-09 zone for the on-post Westbay wells CS-WB01 through CS-WB03 within Plume 2 were all above 1.0 µg/L TCE during 2016. Off-post wells with a TCE concentration reported above 1.0 µg/L include wells LS-5, OFR-3, RFR-10, and CS-WB04-LGR-06 and -LGR-07.

In September 2016, *cis*-1,2-DCE was reported at levels above 1.2 µg/L in on-post wells CS-D, CS-MW1-LGR, CS-MW5-LGR, CS-EXW01 through CS-EXW04 and the LGR-04 zones of CS-WB05 through CS-WB08. Off-post wells with a *cis*-1,2-DCE concentration reported above 1.2 µg/L only included Westbay well CS-WB04 (**Figure 2.13**).

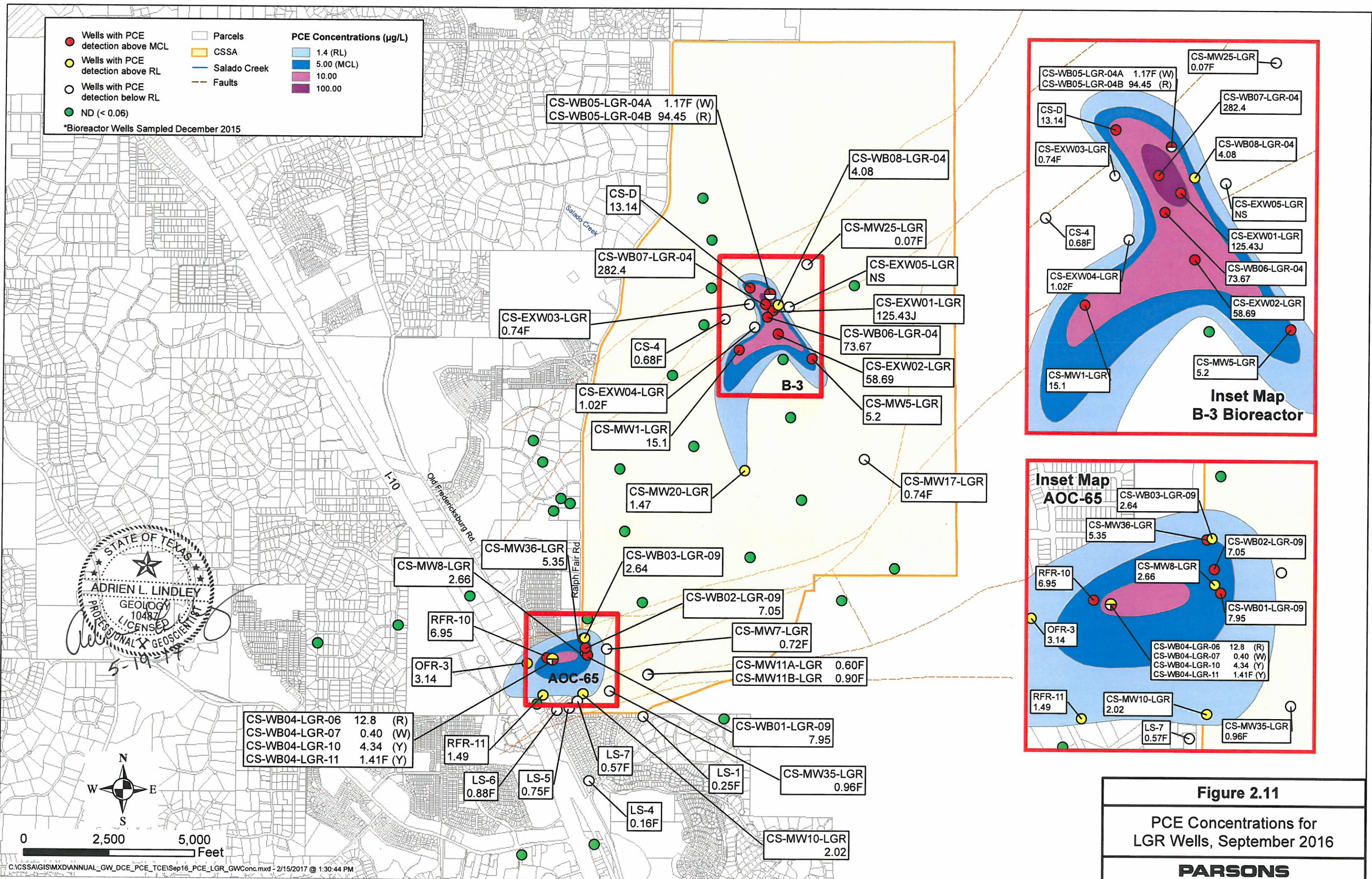


Figure 2.11
 PCE Concentrations for LGR Wells, September 2016
PARSONS

● Wells with TCE detection above MCL
● Wells with TCE detection above RL
○ Wells with TCE detection below RL
● ND (< 0.06)

Parcels
 CSSA
 Salado Creek
 Faults

TCE Concentrations (µg/L)
 1.0 (RL)
 5.00 (MCL)
 10.00
 100.00

*Bioreactor Wells Sampled December 2015

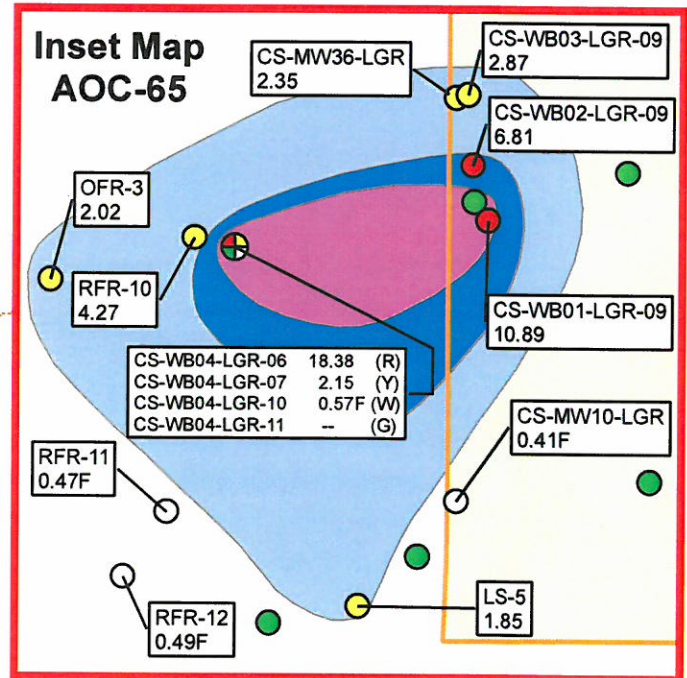
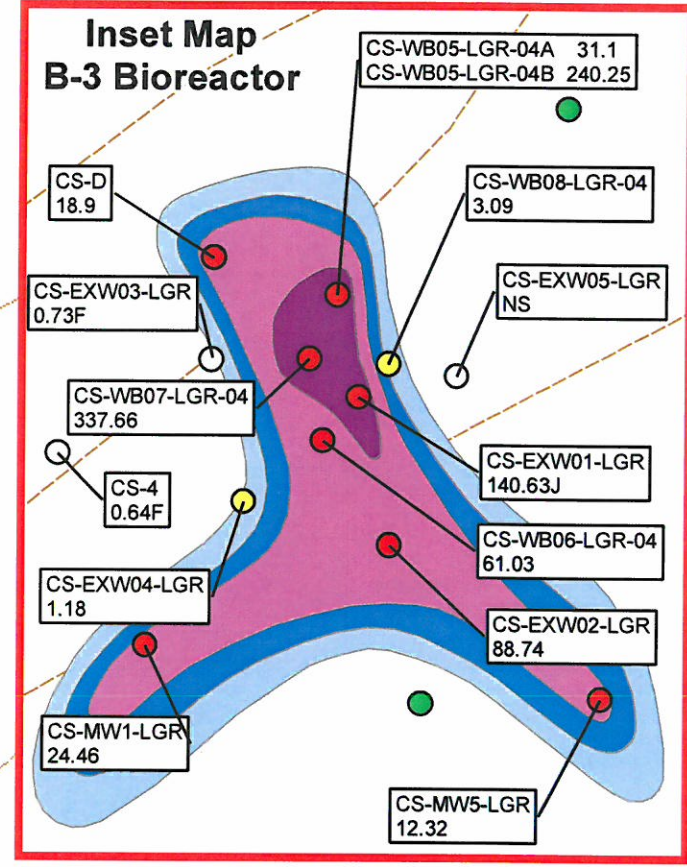
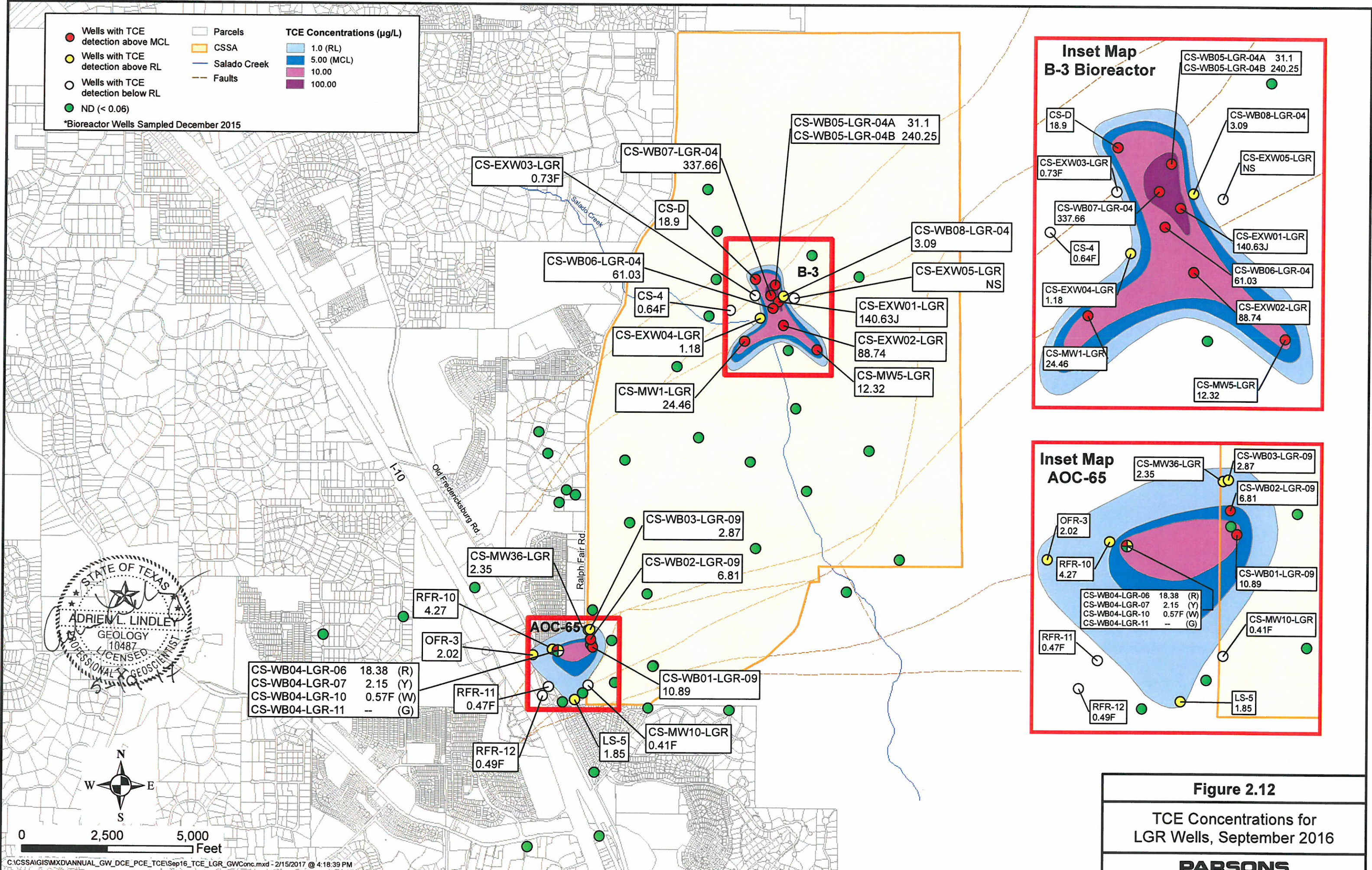


Figure 2.12
TCE Concentrations for LGR Wells, September 2016

PARSONS

● Wells with DCE detection above MCL
● Wells with DCE detection above RL
○ Wells with DCE detection below RL
● ND (< 0.06)

Parcels
 CSSA
 Salado Creek
 Faults

DCE Concentrations (µg/L)
 1.2 (RL)
 10.00 (MCL)
 70.00
 100.00

*Bioreactor Wells Sampled December 2015

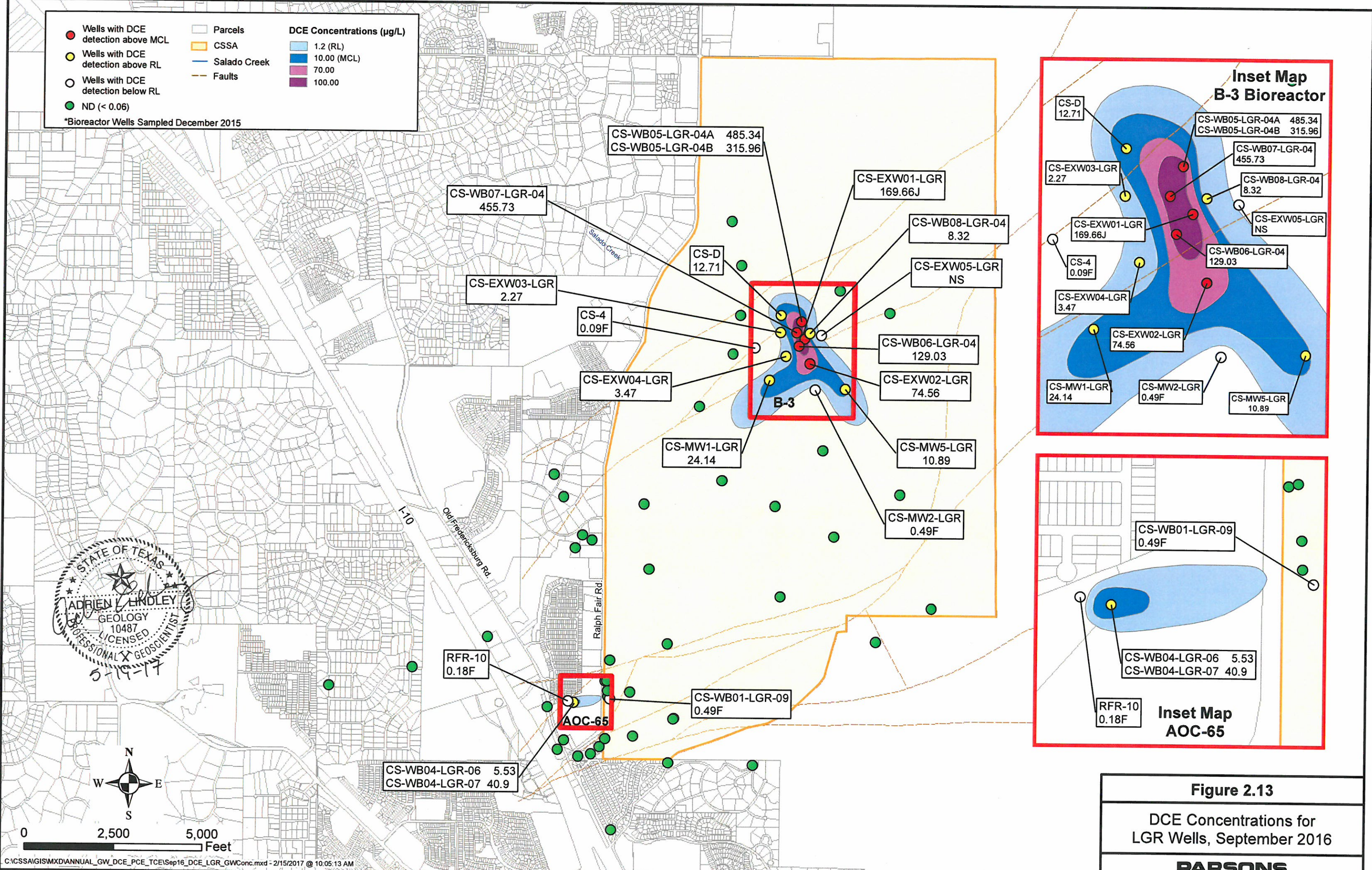


Figure 2.13
 DCE Concentrations for LGR Wells, September 2016
PARSONS

STATE OF TEXAS
 ADRIEN LINDLEY
 GEOLOGY
 10487
 LICENSED
 PROFESSIONAL GEOSCIENTIST
 5-19-17

Isoconcentration maps have also been prepared based on analytical data collected in 2006 through 2015. Those isoconcentration maps are available for review in the *CSSA Environmental Encyclopedia, Volume 5 Groundwater*, in the *2006 through 2015 Annual Groundwater Reports*. In general, the 2016 plume extent and geometry is consistent with 2015 data.

Finally, the maximum annual concentrations detected near the LGR plume centers are generally stable in comparison to 2015. At Plume 1, VOC concentrations have slightly decreased at upgradient and cross-gradient wells CS-EXW-03 and CS-EXW-04, and remained stable or slightly decreased downgradient at CS-MW1-LGR and CS-MW5-LGR. Within Plume 2, the VOC concentrations have slightly increased in well RFR-10 (downgradient off-post) and decreased in CS-MW36-LGR (source area). Shallower source area monitoring points have noted increases in VOC concentrations at CS-WB03 and decreases in VOC concentrations at CS-WB02, presumably in response to the remedial efforts associated with the ISCO treatability study or other hydrogeologic conditions. See **Table 2.11** for comparison of the 2015 and 2016 data near the plume centers.

Table 2.11 Comparison of 2015 & 2016 PCE, TCE, and cis-1,2-DCE Max. Levels

	PCE		TCE		cis-1,2-DCE	
	2015	2016	2015	2016	2015	2015
<u>B-3 Plume 1</u>						
CS-MW16-LGR	85.07	NS	114.21	NS	111.87	NS
CS-MW1-LGR	35.77	15.1	36.16	24.26	46.36	24.14
CS-4	0.65	0.68	0.85	0.57	0.39	0.09
<u>AOC-65 Plume 2</u>						
RFR-10	21.58	13.85	14.42	7.4	0.35	0.18
CS-MW36-LGR	16.68	8.26	28.3	7.86	0.70	0.28
CS-WB02-LGR-09	14.18	7.31	11.24	7.42	0.21	ND
CS-WB03-UGR-01	23,737	9,817.43	216	129.76	21.7	16.67

3.0 GROUNDWATER MONITORING PROGRAM CHANGES

3.1 Access Agreements Obtained in 2016

Access agreements are signed by off-post well owners to grant permission to CSSA to collect groundwater samples from each well. All wells retained after the 2015 update to the LTMO study and DQO's have current access agreements in place.

3.2 Wells Added to or Removed From Program

In the 2015 update to the LTMO study and DQO's for the groundwater monitoring program 34 wells were excluded from the program based on distance from the post and history of non-detects. The exclusion of these wells was implemented in September 2016 after TCEQ and EPA approval was received.

The following wells have been removed from the program because they are greater than 1.5 miles from the post: BSR-03, OW-MT2, OW-DAIRYWELL, SLD-01, and SLD-02.

The following wells have been excluded from the program based on a 5 year history of non-detects: FO-8, FO-17, FO-22, HS-2, HS-3, I10-5, I10-7, JW-6, JW-9, JW-12, JW-13, JW-14, JW-15, JW-26, JW-27, JW-28, JW-29, JW-30, JW-31, OW-HH1, OW-HH3, OW-CE1, OW-CE2, RFR-3, RFR-4, RFR-5, RFR-8, RFR-9, and RFR-13.

Wells JW-5, OW-HH2, and OW-BARNOWL became eligible for exclusion in March 2016 based on 5 years of non-detect. Wells BSR-04 and HS-1 will become eligible for exclusion in September 2017. Well I10-2 can be excluded from the program in June 2018 and well JW-20 will meet the 5 years of non-detect criteria in September 2018.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the evaluation of the on- and off-post groundwater monitoring program data collected in 2016, the following conclusions and recommendations can be made:

- On-post wells CS-D, CS-MW1-LGR, CS-MW5-LGR, and CS-MW36-LGR all exceeded VOC MCLs in 2016 and should remain on the sampling schedule in the future.
- Well CS-MW5-LGR reported PCE and TCE above the applicable MCLs in all four quarters in 2016. This well was first sampled in 2001 and reported its first detection above the MCL in December 2015. This well is currently on a 15 month sampling schedule. Due to its proximity to future drinking water well CS-13 and the recent increase in contaminant concentrations, it is recommended that CS-MW5-LGR be moved to the quarterly monitoring schedule.
- No on-post wells had metals detected above the MCL, SS, or AL in March or June of 2016. Metals have since been dropped from the sampling schedule for monitoring wells. The 4 current and future drinking water wells had no metals detections above the MCL, SS, or AL in 2016.
- Fifteen Westbay intervals had detections above the MCL in 2016. These intervals should remain on the 15-month sampling schedule in the future as recommended in the LTMO study.
- The Westbay wells at AOC-65 continue to indicate the strong presence of contamination near the source area (CS-WB03). Significant contamination above the MCLs continues to exist near-surface and in the lower-yielding upper strata of aquifer. The concentrations in the upper WB03-UGR-01 zone increased significantly in September 2012, likely due to the ISCO injection into the AOC-65 trench performed in August 2012. In May-June 2013, a larger scale ISCO injection was performed and the levels in this upper zone remained elevated. In September-October 2014, an even larger ISCO injection was performed and the VOC concentrations showed a steep decline in some intervals of the aquifer by December 2014. From August-September 2015 a smaller injection was performed using permanganate and injecting into newly installed infiltration cells in the road west of Building 90. This in turn significantly increased concentration in the upper WB03-UGR-01 zone. Recently, (Dec. 1, 2016) permanganate paraffin wax cylinders were installed in 6 select wells at AOC-65. The candles are infused with solid permanganate crystals which allow the permanganate to be released more slowly than injections in the past. This method allows permanganate treatment of groundwater under various (flood or drought) conditions. Future sampling results will determine the effectiveness of the slow release treatment. In most cases throughout the post, VOC contamination in the main portion of aquifer remains at concentrations below the MCLs.
- Off-post wells OFR-3 and RFR-10 exceeded the MCL for PCE and/or TCE in 2016. Wells OFR-3, RFR-10, LS-5, LS-6, LS-7, and RFR-11, are equipped with a GAC filtration system and should remain on the quarterly sampling schedule in the future. The GAC filtration systems will continue to be maintained by CSSA.

- GAC filtered sample RFR-10-A2 exceeded the MCL for PCE and TCE in March 2016. The A side of the system was shut down upon receiving the results and Carbonair changed out both carbon canisters. To detect GAC filtration system failures more quickly, future sampling will be performed immediately after the GAC systems are serviced every 6 months and there will be a 3 day turn-around-time on all post-GAC samples.
- Analytical data indicates CS-MW16-CC remains at the low end of historical VOC contamination levels for this well. This data suggests nearly continuous pumping of CS-MW16-CC to the SWMU B-3 Bioreactor is having a positive impact on Cow Creek aquifer restoration and that BS aquitard between LGR and CC zones in the CS-MW16 vicinity is effective in mitigating further downward migration of contamination. The CS-MW16 wells have been removed from the groundwater monitoring program but data will be captured with the SWMU B-3 bioreactor remediation project.
- **Figure 2.9** shows VOC concentrations in RFR-10 and OFR-3 are very sensitive to rainfall events while VOC concentrations in LS-5, LS-6, LS-7; and RFR-11 show less fluctuations after significant precipitation. This observation suggests RFR-10 and OFR-3 may be located along a fracture pattern that ties into the AOC-65 source area.

5.0 REFERENCES

- CSSA 2002. *CSSA Quality Assurance Program Plan*.
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- Parsons 2001. *Offsite Well Survey Report*.
- Parsons 2005. *Final Three-Tiered Long Term Monitoring Network Optimization Evaluation*.
- Parsons 2006. *Final Data Quality Objectives for the Groundwater Monitoring Program*.
- Parsons 2010. *Updated Off-Post Well Survey Report*.
- Parsons 2016a. *Final Data Quality Objectives for the Groundwater Monitoring Program. Revised January 2016*.
- Parsons 2016b. *2015 Update: Final Three-Tiered Long Term Monitoring Network Optimization Evaluation*.
- NOAA, National Weather Service Forecast, Monthly/Annual/Average Precipitation Boerne and San Antonio (KSAT), Texas (1986 - 2015), <http://nowdata.rcc-acis.org/ewx/>

APPENDIX A

EVALUATION OF DATA QUALITY OBJECTIVES ATTAINMENT ON-POST AND OFF-POST

Appendix A. On-Post Evaluation of Data Quality Objectives Attainment

Activity	Objectives	Action	Objective Attained?	Recommendations
Field Sampling	Conduct field sampling in accordance with procedures defined in the project work plan, SAP, QAPP, and HSP.	All sampling was conducted in accordance with the procedures described in the project plans.	Yes.	NA
Characterization of Environmental Setting (Hydrogeology)	Prepare water-level contour and/or potentiometric maps for each formation of the Middle Trinity Aquifer (3.5.3).	Potentiometric surface maps were prepared based on water levels measured in each of CSSA's wells screened in three formations in 2016.	To the extent possible with data available. Due to the limited data available and the fact that wells are completed across multiple water-bearing units, potentiometric maps should only be used for regional water flow direction, not local. Ongoing pumping in the CSSA area likely affects the natural groundwater flow direction.	As additional wells are installed screened in distinct formations, future evaluations will eliminate reliance on wells screened across multiple formations.
	Describe the flow system, including the vertical and horizontal components of flow (2.1.9).	Potentiometric maps were created using 2016 water level data, and horizontal flow direction was tentatively identified. Insufficient data are currently available to determine vertical component of flow.	As described above, due to the lack of aquifer-specific water level information, potentiometric surface maps should only be used as an estimate of regional flow direction.	Same as above.
	Define formation(s) in the Middle Trinity Aquifer are impacted by the VOC contaminants (2.1.3).	Quarterly groundwater monitoring provides information on Middle Trinity Aquifer impacts. Monitoring wells equipped with Westbay® - multi-port samplers are sampled by zone, the LGR zones are sampled every 15 months and the BS and CC zones are sampled every 30 months. Selected zones from these wells were sampled in 2016.	Yes.	Continue sampling.

Activity	Objectives	Action	Objective Attained?	Recommendations																				
	Identify any temporal changes in hydraulic gradients due to seasonal influences (2.1.5).	Downloaded data from continuous-reading transducer in wells: CS-1, CS-10, CS-12, CS-MW4-LGR, CS-MW16-LGR, CS-MW16-CC, CS-MW9-LGR, CS-MW12-LGR, CS-MW12-CC, CS-MW10-CC and CS-MW24-LGR. Data was also downloaded from the northern and southern continuous-reading weather stations B-3 WS and AOC-65 WS. Water levels will be graphed from selected wells against precipitation through 2016 and will be included in this annual groundwater report.	Yes.	Continue collection of transducer data and possibly install transducers in other cluster wells.																				
Contamination Characterization (Groundwater Contamination)	Characterize the horizontal and vertical extent of any immiscible or dissolved plume(s) originating from the Facility (3.1.2).	Samples for laboratory analysis were collected from 34 of 48 CSSA wells. Of the 45 samples scheduled to be collected in 2016 48 samples were actually collected. Three extra samples from CS-MW5-LGR were collected to further evaluate recently rising VOC levels. Also, 3 additional samples were collected from the drinking water wells in July to confirm the June results.	The horizontal and vertical extent of groundwater contamination is continuously monitored.	Continue groundwater monitoring and construct additional wells as necessary.																				
	Determine the horizontal and vertical concentration profiles of all constituents of concern (COCs) in the groundwater that are measured by USEPA-approved procedures (3.1.2). COCs are those chemicals that have been detected in groundwater in the past and their daughter (breakdown) products.	Samples were analyzed for the selected VOCs using USEPA method SW8260B. Drinking water wells were also sampled for metals (As, Ba, Cr, Cu, Cd, Hg, Pb, Zn). Analyses were conducted in accordance with the AFCEE QAPP and approved variances. All RLs were below MCLs, as listed below: <table border="1"> <thead> <tr> <th>ANALYTE</th> <th>RL (µg/L)</th> <th>MCL (µg/L)</th> </tr> </thead> <tbody> <tr> <td>1,1-DCE</td> <td>1.2</td> <td>7</td> </tr> <tr> <td><i>cis</i>-1,2-DCE</td> <td>1.2</td> <td>70</td> </tr> <tr> <td><i>trans</i>-1,2-DCE</td> <td>0.6</td> <td>100</td> </tr> <tr> <td>Vinyl Chloride</td> <td>1.1</td> <td>2</td> </tr> <tr> <td>PCE</td> <td>1.4</td> <td>5</td> </tr> <tr> <td>TCE</td> <td>1.0</td> <td>5</td> </tr> </tbody> </table>	ANALYTE	RL (µg/L)	MCL (µg/L)	1,1-DCE	1.2	7	<i>cis</i> -1,2-DCE	1.2	70	<i>trans</i> -1,2-DCE	0.6	100	Vinyl Chloride	1.1	2	PCE	1.4	5	TCE	1.0	5	Yes.
ANALYTE	RL (µg/L)	MCL (µg/L)																						
1,1-DCE	1.2	7																						
<i>cis</i> -1,2-DCE	1.2	70																						
<i>trans</i> -1,2-DCE	0.6	100																						
Vinyl Chloride	1.1	2																						
PCE	1.4	5																						
TCE	1.0	5																						

Activity	Objectives	Action	Objective Attained?	Recommendations																											
Contamination Characterization (Groundwater Contamination) (Continued)		<table border="1"> <thead> <tr> <th data-bbox="617 250 793 272">ANALYTE</th> <th data-bbox="814 250 911 272">RL (µg/L)</th> <th data-bbox="1003 250 1121 272">MCL (µg/L)</th> </tr> </thead> <tbody> <tr> <td data-bbox="617 282 722 305">Arsenic</td> <td data-bbox="827 282 848 305">30</td> <td data-bbox="1003 282 1024 305">10</td> </tr> <tr> <td data-bbox="617 310 701 332">Barium</td> <td data-bbox="827 310 848 332">5</td> <td data-bbox="1003 310 1058 332">2000</td> </tr> <tr> <td data-bbox="617 337 722 360">Chromium</td> <td data-bbox="827 337 848 360">10</td> <td data-bbox="1003 337 1045 360">100</td> </tr> <tr> <td data-bbox="617 365 680 388">Copper</td> <td data-bbox="827 365 848 388">10</td> <td data-bbox="1003 365 1058 388">1300</td> </tr> <tr> <td data-bbox="617 393 659 415">Zinc</td> <td data-bbox="827 393 848 415">50</td> <td data-bbox="1003 393 1100 415">5000 (SS)</td> </tr> <tr> <td data-bbox="617 420 701 443">Cadmium</td> <td data-bbox="827 420 848 443">7</td> <td data-bbox="1003 420 1024 443">5</td> </tr> <tr> <td data-bbox="617 448 659 470">Lead</td> <td data-bbox="827 448 848 470">25</td> <td data-bbox="1003 448 1079 470">15 (AL)</td> </tr> <tr> <td data-bbox="617 475 680 498">Mercury</td> <td data-bbox="827 475 848 498">1</td> <td data-bbox="1003 475 1024 498">2</td> </tr> </tbody> </table>	ANALYTE	RL (µg/L)	MCL (µg/L)	Arsenic	30	10	Barium	5	2000	Chromium	10	100	Copper	10	1300	Zinc	50	5000 (SS)	Cadmium	7	5	Lead	25	15 (AL)	Mercury	1	2		
	ANALYTE	RL (µg/L)	MCL (µg/L)																												
	Arsenic	30	10																												
	Barium	5	2000																												
Chromium	10	100																													
Copper	10	1300																													
Zinc	50	5000 (SS)																													
Cadmium	7	5																													
Lead	25	15 (AL)																													
Mercury	1	2																													
Meet AFCEE QAPP quality assurance requirements.	Samples were analyzed in accordance with the CSSA QAPP and approved variances. Parsons chemists verified all data and performed data validation according to the CSSA QAPP and approved variances.	Yes.	NA																												
	All data flagged with a "U," "J," "M," and "F" are usable for characterizing contamination. All "R" flagged data are considered unusable.	Yes.	NA																												
	An MDL study for arsenic, cadmium, and lead was not performed within a year of the analyses, as required by the AFCEE QAPP.	The laboratory performed new MDL studies in February 2001 for these metals and the new MDL values were found to be almost identical to the previous MDLs and all met the associated AFCEE QAPP requirements. MDLs for these three metals are well below MCLs. In addition, the laboratory performed daily calibrations and RL verifications for these metals, both of which demonstrate the laboratory's ability to detect and quantitate these metals at RL levels. These daily analyses also indicate that concentrations above the laboratory RL for these compounds were not affected by the expired MDL study.	Use results for groundwater characterization purposes.																												

Activity	Objectives	Action	Objective Attained?	Recommendations
Remediation	Determine goals and create cost-effective and technologically appropriate methods for remediation (2.2.1).	Continued data collection will provide analytical results for accomplishing this objective.	Ongoing.	Continue sampling and evaluation, including quarterly groundwater monitoring teleconferences to address remediation.
	Determine placement of new wells for monitoring (2.3.1, 3.6)	Sampling frequency and sample locations to be monitored (including any new wells) will be based on trend data from monitoring event(s) (3.1.5).	Ongoing.	Continue quarterly groundwater teleconferences to discuss sampling frequency and placement of new monitor wells.
Project schedule/ Reporting	Produce a quarterly monitoring project schedule as a road map for sampling, analysis, validation, verification, reviews, and reports.	Prepare schedules and sampling guidelines prior to each quarterly sampling event.	Yes.	Continue sampling schedule preparation each quarter.

Appendix A Off-Post Evaluation of Data Quality Objectives Attainment

Activity	Objectives	Action	Objective Attained?	Recommendations
Field Sampling	Conduct field sampling in accordance with procedures defined in the project work plan, SAP, QAPP, and HSP.	All sampling was conducted in accordance with the procedures described in the project plans.	Yes	NA
Contamination Characterization (Groundwater Contamination)	Determine the potential extent of off-post contamination (§2.3.1 of the DQOs for the Groundwater Contamination Investigation, revised 2015).	Samples for laboratory analysis were collected from selected off-post public and private wells, which are located within a ½ mile radius of CSSA. Also, selected wells outside the ½ mile radius were sampled at the request of the EPA.	Partially	Continue sampling wells in accordance with the LTMO study recommendations. If significant changes are seen in contaminant concentrations then consider adding wells in the vicinity back to the sampling schedule to track any plume movement.
	Meet CSSA QAPP quality assurance requirements.	Samples were analyzed in accordance with the CSSA QAPP and approved variances. Parsons chemists verified all data and performed data validation according to the CSSA QAPP and approved variances.	Yes	NA
		All data flagged with a “U”, “M”, and “J” are usable for characterizing contamination.	Yes	NA

Activity	Objectives	Action	Objective Attained?	Recommendations
	Evaluate CSSA monitoring program and expand as necessary (§2.3.1 of the DQOs for the Groundwater Contamination Investigation, revised 2015). Determine locations of future monitoring locations.	Evaluation of data collected is ongoing and is reported in this annual groundwater report and will be reported in future quarterly groundwater reports. Additional information covering the CSSA monitoring program is available in Volume 5, CSSA Environmental Encyclopedia.	Yes	Continue data evaluation and quarterly teleconferences for evaluation of the monitoring program. Each teleconference/planning session covers expansion of the quarterly monitoring program, if necessary.
Project schedule/ Reporting	The quarterly monitoring project schedule shall provide a schedule for sampling, analysis, validation, verification, reviews, and reports for monitoring events off-post.	A schedule for sampling, analysis, validation, verification, data review and reports is provided in this annual groundwater report and will be reported in future quarterly groundwater reports. Additional information covering the CSSA monitoring program is available in Volume 5, CSSA Environmental Encyclopedia.	Yes	Continue quarterly and annual reporting to include a schedule for sampling, analysis, validation, verification, data review and data reports.

Activity	Objectives	Action	Objective Attained?	Recommendations
Remediation	Evaluate the effectiveness of GACs (§3.2.3) and install as needed (§3.2.5 both of the DQOs for the Groundwater Contamination Investigation, revised 2015).	Perform maintenance as needed. Install new GACs as needed.	Yes	Maintenance to the off-post GAC systems to be continued by Parsons' personnel approximately every 3 weeks. Semi annual (or as needed) maintenance to the off-post GAC systems by additional subcontractors to continue. Evaluations of future sampling results for installation of new GAC systems will occur as needed.

APPENDIX B

2016 QUARTERLY ON-POST GROUNDWATER ANALYTICAL RESULTS

Appendix B
2016 Quarterly On-Post Groundwater Monitoring Analytical Results

Well ID	Laboratory	Analytical Method	Sample Date	Dichloro-	Dichloro-	Dichloro-	Tetra-	Tri-	Vinyl	pH	Temp. (deg. C)	Specific Conductivity (mS)
				ethene, 1,1 (ug/L)	ethene, <i>cis</i> - 1,2 (ug/L)	ethene, <i>trans</i> - 1,2 (ug/L)	chloroethene (ug/L)	chloroethene (ug/L)	chloride (ug/L)			
CS-1	APPL	SW8260B	3/16/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.33	22.13	0.531
	APPL	SW8260B	6/17/2016	0.12U	0.07U	0.08U	0.27F	0.05U	0.08U	7.15	22.67	0.571
	APPL	SW8260B	7/21/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.20	22.68	0.579
	APPL	SW8260B	9/27/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.13	22.04	0.584
	APPL	SW8260B	12/13/2016	NA	0.07U	NA	0.08F	0.05U	0.08U	7.18	21.94	0.562
CS-2	APPL	SW8260B	9/9/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.85	21.83	0.726
CS-4 <i>Duplicate</i>	APPL	SW8260B	9/9/2016	NA	0.07U	NA	0.68F	0.64F	0.08U	6.98	21.71	0.582
	APPL	SW8260B	9/9/2016	NA	0.09F	NA	0.66F	0.57F	0.08U	6.98	21.71	0.582
CS-10 <i>Duplicate</i>	APPL	SW8260B	3/16/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.29	22.58	0.576
	APPL	SW8260B	3/16/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.29	22.58	0.576
	APPL	SW8260B	6/17/2016	0.12U	0.07U	0.08U	0.16F	0.05U	0.08U	7.14	22.87	0.582
	APPL	SW8260B	7/21/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.07	22.79	0.587
	APPL	SW8260B	9/27/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.12	22.64	0.590
	APPL	SW8260B	9/27/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.12	22.64	0.590
	APPL	SW8260B	12/13/2016	NA	0.07U	NA	0.09F	0.05U	0.08U	7.15	22.17	0.564
CS-10 <i>Duplicate</i>	APPL	SW8260B	12/13/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.15	22.17	0.564
	APPL	SW8260B	12/13/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.15	22.17	0.564
CS-12 <i>Duplicate</i>	APPL	SW8260B	3/16/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.33	22.20	0.516
	APPL	SW8260B	6/17/2016	0.12U	0.07U	0.08U	0.35F	0.05U	0.08U	7.20	22.28	0.521
	APPL	SW8260B	7/21/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.17	22.22	0.520
	APPL	SW8260B	7/21/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.17	22.22	0.520
	APPL	SW8260B	9/27/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.11	22.05	0.521
	APPL	SW8260B	12/13/2016	NA	0.07U	NA	0.08F	0.05U	0.08U	7.18	22.23	0.503
CS-13	APPL	SW8260B	3/16/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.31	23.35	0.661
	APPL	SW8260B	6/20/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.17	23.5	0.683
	APPL	SW8260B	10/3/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.16	23.45	0.663
CS-D	APPL	SW8260B	9/22/2016	NA	12.71	NA	13.14	18.9	0.08U	7.07	21.88	0.522
CS-MWG-LGR	APPL	SW8260B	2/3/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.20	17.62	0.455
CS-MWH-LGR	APPL	SW8260B	2/3/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.14	21.91	0.531
CS-I	APPL	SW8260B	2/3/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.23	20.44	0.534
CS-MW1-LGR	APPL	SW8260B	9/21/2016	NA	24.14	NA	15.1	24.46	0.08U	6.94	22.10	0.544
CS-MW2-LGR	APPL	SW8260B	9/9/2016	NA	0.49F	NA	0.06U	0.05U	0.08U	7.48	21.85	0.552
CS-MW3-LGR	APPL	SW8260B	9/13/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.15	22.60	0.526
CS-MW4-LGR	APPL	SW8260B	9/9/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.97	21.60	0.672
CS-MW5-LGR	APPL	SW8260B	2/3/2016	0.12U	16.12	0.43F	7.68	17.93	0.08U	7.08	20.62	0.520
	APPL	SW8260B	3/8/2016	0.12U	16.94	0.44F	6.99	18.68	0.08U	7.05	21.32	0.530
	APPL	SW8260B	6/7/2016	0.12U	10.5	0.08U	4.18	10.96	0.08U	7.01	21.85	0.532
	APPL	SW8260B	9/9/2016	NA	10.89	NA	5.2	12.32	0.08U	6.94	22.18	0.548
	APPL	SW8260B	12/12/2016	NA	12.86	NA	5.26	12.91	0.08U	7.12	21.84	0.530
CS-MW6-LGR	APPL	SW8260B	9/12/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.95	22.84	0.587
CS-MW7-LGR	APPL	SW8260B	9/12/2016	NA	0.07U	NA	0.72F	0.05U	0.08U	6.81	21.70	0.683
CS-MW8-LGR	APPL	SW8260B	9/12/2016	NA	0.07U	NA	2.66	0.05U	0.08U	6.83	22.52	0.667
CS-MW9-LGR	APPL	SW8260B	9/13/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.83	21.51	0.617
CS-MW10-LGR	APPL	SW8260B	9/12/2016	NA	0.07U	NA	2.02	0.41F	0.08U	6.78	23.01	0.680
CS-MW11A-LGR <i>Duplicate</i>	APPL	SW8260B	9/12/2016	NA	0.07U	NA	0.56F	0.05U	0.08U	6.84	23.59	0.569
	APPL	SW8260B	9/12/2016	NA	0.07U	NA	0.60F	0.05U	0.08U	6.84	23.59	0.569
CS-MW11B-LGR	APPL	SW8260B	9/13/2016	NA	0.07U	NA	0.90F	0.05U	0.08U	6.92	21.80	0.596
CS-MW12-LGR	APPL	SW8260B	9/8/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.04	22.73	0.573
CS-MW17-LGR	APPL	SW8260B	9/21/2016	NA	0.07U	NA	0.74F	0.05U	0.08U	6.88	22.12	0.627
CS-MW18-LGR	APPL	SW8260B	9/9/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.12	23.41	0.546
CS-MW19-LGR	APPL	SW8260B	9/8/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.87	22.29	0.629
CS-MW20-LGR	APPL	SW8260B	9/13/2016	NA	0.07U	NA	1.47	0.05U	0.08U	6.89	21.63	0.613
CS-MW21-LGR	APPL	SW8260B	9/13/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.06	21.43	0.571
CS-MW22-LGR	APPL	SW8260B	9/13/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.10	22.28	0.566
CS-MW23-LGR	APPL	SW8260B	9/13/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.09	22.18	0.543
CS-MW24-LGR	APPL	SW8260B	9/14/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.04	21.99	0.578
CS-MW25-LGR	APPL	SW8260B	2/3/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	7.29	20.00	0.472
	APPL	SW8260B	9/13/2016	NA	0.07U	NA	0.07F	0.05U	0.08U	7.23	22.01	0.474
CS-MW35-LGR	APPL	SW8260B	9/12/2016	NA	0.07U	NA	0.96F	0.05U	0.08U	6.64	22.27	0.683
CS-MW36-LGR	APPL	SW8260B	3/8/2016	0.12U	0.28F	0.08U	8.26	7.86	0.08U	7.08	22.13	1.205
	APPL	SW8260B	6/7/2016	0.12U	0.07U	0.08U	4.12	1.53	0.08U	6.87	22.53	0.805
	APPL	SW8260B	9/12/2016	NA	0.07U	NA	5.35	2.35	0.08U	7.17	23.17	1.746
Comparison Criteria												
Maximum Contaminant Level (MCL)				7	70	100	5.0	5.0	2.0			
Reporting Limit (RL)				1.2	1.2	0.6	1.4	1.0	1.1			
MDL				0.12	0.07	0.08	0.06	0.05	0.08			
BOLD	≥ MDL											
BOLD	≥ RL											
BOLD	≥ MCL											

All samples were analyzed by APPL, Inc.
VOC data reported in ug/L & metals data reported in mg/L.
Abbreviations/Notes:
mS millisiemens
µg/L micrograms per liter
mg/L milligrams per liter
deg. C degrees Celsius
Duplicate Field Duplicate
TCE Trichloroethene
PCE Tetrachloroethene
DCE Dichloroethene
Data Qualifiers
NA = Analyte not analyzed

Appendix B
2016 Quarterly On-Post Groundwater Monitoring Analytical Results

Well ID	Laboratory	Analytical Method	Sample Date	Dichloro-ethene, 1,1	Dichloro-ethene, <i>cis</i> - 1,2	Dichloro-ethene, <i>trans</i> - 1,2	Tetra-chloroethene	Tri-chloroethene	Vinyl chloride	pH	Temp. (deg. C)	Specific Conductivity (mS)
				(ug/L)	(ug/L)	(ug/L)	(ug/L)	(ug/L)	(ug/L)	Field Measurements		

U-The analyte was analyzed for, but not detected. The associated numerical value is at or below the MDL.
F-The analyte was positively identified but the associated numerical value is below the RL.

Appendix B
2016 Quarterly On-Post Groundwater Monitoring Analytical Results

Well ID	Laboratory	Sample Date	Arsenic (mg/L)	Barium (mg/L)	Cadmium (mg/L)	Chromium (mg/L)	Copper (mg/L)	Lead (mg/L)	Mercury (mg/L)	Zinc (mg/L)	
CS-1	APPL	3/16/2016	0.0067F	0.0344	0.0005U	0.0010U	0.005F	0.0019U	0.0001U	0.208	
	APPL	6/17/2016	0.0078F	0.0395	0.0005U	0.0016F	0.014	0.0068F	0.0001U	0.284	
	APPL	9/27/2016	0.00022U	0.0379	0.0005U	0.0010U	0.008F	0.0019U	0.0001U	0.392	
	APPL	12/13/2016	0.00483F	0.0379	0.0005U	0.0010U	0.009F	0.0019U	0.0001U	0.230	
CS-10	APPL	3/16/2016	0.0027F	0.0402	0.0005U	0.0010U	0.007F	0.0019U	0.0002F	0.751	
	<i>Duplicate</i>	APPL	3/16/2016	0.0045F	0.0389	0.0005U	0.0010U	0.006F	0.0019U	0.0002F	0.708
	APPL	6/17/2016	0.0060F	0.0403	0.0005U	0.0014F	0.005F	0.0050F	0.0001U	0.357	
	APPL	9/27/2016	0.00022U	0.0412	0.0005U	0.0013F	0.015	0.0019U	0.0001U	0.601	
	<i>Duplicate</i>	APPL	9/27/2016	0.00024F	0.0429	0.0005U	0.0001U	0.005F	0.0019U	0.0001U	0.522
	APPL	12/13/2016	0.00571F	0.0396	0.0005U	0.0010U	0.005F	0.0019U	0.0001U	0.374	
	<i>Duplicate</i>	APPL	12/13/2016	0.00236F	0.0396	0.0005U	0.0010U	0.012	0.0019U	0.0001U	0.413
CS-12	APPL	3/16/2016	0.0048F	0.0308	0.0005U	0.0010U	0.006F	0.0019U	0.0001U	0.049F	
	APPL	6/17/2016	0.0070F	0.0314	0.0005U	0.0016F	0.035	0.0096F	0.0001U	0.104	
	APPL	9/27/2016	0.00160F	0.031	0.0005U	0.0013F	0.006F	0.0019U	0.0001U	0.047F	
	APPL	12/13/2016	0.00682F	0.0318	0.0005U	0.0010U	0.031	0.0019U	0.0001U	0.054	
CS-13	APPL	3/16/2016	0.0067F	0.0297	0.0005U	0.0010U	0.005F	0.0019U	0.0001U	0.247	
	APPL	6/20/2016	0.0028F	0.0308	0.0005U	0.0017F	0.003U	0.0019U	0.0001U	0.276	
	APPL	10/3/2016	0.00508F	0.0321	0.0005U	0.0015F	0.003U	0.0027F	0.0001U	0.227	
CS-MW5-LGR	APPL	3/8/2016	NA	NA	0.0005U	0.0010U	NA	0.0019U	0.0001U	NA	
	APPL	6/7/2016	NA	NA	0.0005U	0.0010U	NA	0.0019U	0.0001U	NA	
CS-MW36-LGR	APPL	3/8/2016	NA	NA	0.0005U	0.0131	NA	0.0019U	0.0001U	NA	
	APPL	6/7/2016	NA	NA	0.0005U	0.0036F	NA	0.0019U	0.0001U	NA	

Appendix B

2016 Quarterly On-Post Groundwater Monitoring Analytical Results

Well ID	Laboratory	Sample Date	Arsenic (mg/L)	Barium (mg/L)	Cadmium (mg/L)	Chromium (mg/L)	Copper (mg/L)	Lead (mg/L)	Mercury (mg/L)	Zinc (mg/L)
Comparison Criteria										
Maximum Contaminant Level (MCL)			0.01	2.0	0.005	0.1	1.3	0.015 (AL)	0.002	5.0 (SS)
RL			0.03	0.005	0.007	0.01	0.01	0.025	0.001	0.05
MDL			0.00022	0.0003	0.0005	0.001	0.003	0.0019	0.0001	0.008

Bold	≥ MCL
Bold	≥ RL
Bold	≥ MDL

All samples were analyzed by APPL, Inc. using laboratory method SW8260B.
 VOC data reported in µg/L & metals data reported in mg/L.

Abbreviations/Notes:
 µg/L micrograms per liter
 mg/L milligrams per liter
Duplicate Field Duplicate
 AL Action Level
 SS Secondary Standard

Data Qualifiers:
 NA = Analyte not analyzed
 F-The analyte was positively identified but the associated numerical value is below the RL.
 U-The analyte was analyzed for, but not detected. The associated numerical value is at or below the MDL.

APPENDIX C

2016 WESTBAY® ANALYTICAL RESULTS

Appendix C
2016 Westbay® Analytical Results

Well ID	Date	1,1-DCE	cis-1,2-DCE	trans-1,2-DCE	TCE	PCE	Vinyl Chloride
Method Detection Limit	MDL	0.3	0.16	0.19	0.16	0.15	0.23
Current Reporting Limit	RL	1.2	1.2	0.6	1.0	1.4	1.1
Max. Contaminant Level	MCL	7.0	70	100	5.0	5.0	2.0
CS-WB01-UGR-01	8-Jun-16	<0.12	<0.07	<0.08	<0.05	0.99F	<0.08
	14-Sep-16	Dry	Dry	Dry	Dry	Dry	Dry
CS-WB01-LGR-01	8-Jun-16	<0.12	<0.07	<0.08	0.22F	1.36F	<0.08
	14-Sep-16	NA	<0.07	NA	0.53F	0.93F	<0.08
CS-WB01-LGR-02	8-Jun-16	<0.12	<0.07	<0.08	2.05	9.6	<0.08
	14-Sep-16	NA	<0.07	NA	2.46	11.55	<0.08
CS-WB01-LGR-03	8-Jun-16	<0.12	<0.07	<0.08	19.59	7.06	<0.08
	14-Sep-16	NA	<0.07	NA	12.67	4.26	<0.08
CS-WB01-LGR-04	8-Jun-16	<0.12	0.28F	<0.08	<0.05	<0.06	<0.08
	14-Sep-16	NA	0.49F	NA	<0.05	<0.06	<0.08
CS-WB01-LGR-05	8-Jun-16	<0.12	0.41F	<0.08	2.6	<0.06	<0.08
	14-Sep-16	NA	0.60F	NA	1.36	<0.06	<0.08
CS-WB01-LGR-06	8-Jun-16	<0.12	1.58	<0.08	3.03	<0.06	<0.08
	14-Sep-16	NA	2.10	NA	3.11	<0.06	<0.08
CS-WB01-LGR-07	8-Jun-16	<0.12	0.29F	<0.08	13.78	14.3	<0.08
	14-Sep-16	NA	0.23F	NA	13.99	13.07	<0.08
CS-WB01-LGR-08	8-Jun-16	<0.12	18.31	0.76	4.59	0.79F	<0.08
	14-Sep-16	NA	20.78	NA	2.81	<0.06	<0.08
CS-WB01-LGR-09	8-Jun-16	<0.12	0.69F	<0.08	12.56	9.55	<0.08
	14-Sep-16	NA	0.49F	NA	10.89	7.95	<0.08
CS-WB02-UGR-01	14-Jun-16	Dry	Dry	Dry	Dry	Dry	Dry
	15-Sep-16	NA	Dry	NA	Dry	Dry	Dry
CS-WB02-LGR-01	14-Jun-16	<0.12	<0.07	<0.08	<0.05	0.59F	<0.08
	15-Sep-16	NA	Dry	NA	Dry	Dry	Dry
CS-WB02-LGR-02	14-Jun-16	<0.12	<0.07	<0.08	<0.05	0.22F	<0.08
	15-Sep-16	NA	Dry	NA	Dry	Dry	Dry
CS-WB02-LGR-03	14-Jun-16	<0.12	<0.07	<0.08	0.47F	3.28	<0.08
	15-Sep-16	NA	<0.07	NA	<0.05	2.35	<0.08
CS-WB02-LGR-04	14-Jun-16	<0.12	<0.07	<0.08	5.03	2.86	<0.08
	15-Sep-16	NA	<0.07	NA	5.04	2.8	<0.08
CS-WB02-LGR-05	14-Jun-16	<0.12	0.23F	0.25F	1.92	0.66F	<0.08
	15-Sep-16	NA	0.28F	NA	1.79	<0.06	<0.08
CS-WB02-LGR-06	14-Jun-16	<0.12	<0.07	<0.08	2.27	5.38	<0.08
	15-Sep-16	NA	<0.07	NA	1.93	3.81	<0.08
CS-WB02-LGR-07	14-Jun-16	<0.12	0.31F	<0.08	1.57	0.52F	<0.08
	15-Sep-16	NA	0.40F	NA	1.34	0.48F	<0.08
CS-WB02-LGR-08	14-Jun-16	<0.12	3.1	0.36F	0.28F	<0.06	<0.08
	15-Sep-16	NA	4.28	NA	<0.05	<0.06	<0.08
CS-WB02-LGR-09	14-Jun-16	<0.12	<0.07	<0.08	7.42	7.31	<0.08
	15-Sep-16	NA	<0.07	NA	6.81	7.05	<0.08
CS-WB03-UGR-01	16-Jun-16	<0.12	7.94	0.95	73.39	7443.88*	<0.08
	19-Sep-16	NA	16.67	NA	129.76*	9817.43*	<0.08
CS-WB03-LGR-01	16-Jun-16	<0.12	0.89F	<0.08	17.22	314.33*	<0.08
	19-Sep-16	NA	0.71F	NA	15.75	337.86*	<0.08

Appendix C
2016 Westbay® Analytical Results

Well ID	Date	1,1-DCE	cis-1,2-DCE	trans-1,2-DCE	TCE	PCE	Vinyl Chloride
Method Detection Limit	MDL	0.3	0.16	0.19	0.16	0.15	0.23
Current Reporting Limit	RL	1.2	1.2	0.6	1.0	1.4	1.1
Max. Contaminant Level	MCL	7.0	70	100	5.0	5.0	2.0
CS-WB03-LGR-02	16-Jun-16	<0.12	<0.07	<0.08	4.7	146.66*	<0.08
	19-Sep-16	NA	Dry	NA	Dry	Dry	Dry
CS-WB03-LGR-03	16-Jun-16	<0.12	<0.07	<0.08	1.13	3.79	<0.08
	19-Sep-16	NA	<0.07	NA	1.21	4.47	<0.08
CS-WB03-LGR-04	16-Jun-16	<0.12	0.25F	<0.08	6.59	17.97	<0.08
	19-Sep-16	NA	0.30F	NA	5.57	15.06	<0.08
CS-WB03-LGR-05	15-Jun-16	<0.12	<0.07	<0.08	2.48	14.1	<0.08
	19-Sep-16	NA	<0.07	NA	2.67	15.71	<0.08
CS-WB03-LGR-06	15-Jun-16	<0.12	6.83	<0.08	0.13F	<0.06	<0.08
	19-Sep-16	NA	8.87	NA	<0.05	<0.06	<0.08
CS-WB03-LGR-07	15-Jun-16	<0.12	3.09	<0.08	21.75	6.22	<0.08
	19-Sep-16	NA	3.47	NA	10.62	2.82	<0.08
CS-WB03-LGR-08	15-Jun-16	<0.12	2.73	<0.08	0.27F	<0.06	0.81F
	19-Sep-16	NA	3.14	NA	0.41F	<0.06	1.14
CS-WB03-LGR-09	15-Jun-16	<0.12	<0.07	<0.08	2.69	1.94	<0.08
	19-Sep-16	NA	<0.07	NA	2.87	2.64	<0.08
CS-WB04-UGR-01	9-Jun-16	Dry	Dry	Dry	Dry	Dry	Dry
	20-Sep-16	NA	Dry	NA	Dry	Dry	Dry
CS-WB04-LGR-01	20-Sep-16	NA	<0.07	NA	<0.05	1.11F	<0.08
CS-WB04-LGR-06	9-Jun-16	<0.12	3.83	0.24F	13.37	13.96	<0.08
	20-Sep-16	NA	5.53	NA	18.38	12.8	<0.08
CS-WB04-LGR-07	9-Jun-16	<0.12	37.11	0.23F	1.15	<0.06	<0.08
	20-Sep-16	NA	40.9	NA	2.15	0.40F	<0.08
CS-WB04-LGR-08	9-Jun-16	<0.12	<0.07	<0.08	0.86F	0.51F	<0.08
	20-Sep-16	NA	0.42F	NA	1.29	1.41	<0.08
CS-WB04-LGR-09	9-Jun-16	<0.12	<0.07	<0.08	6.02	7.6	<0.08
	20-Sep-16	NA	<0.07	NA	7.84	14.72	<0.08
CS-WB04-LGR10	9-Jun-16	<0.12	<0.07	<0.08	0.73F	1.71	<0.08
	20-Sep-16	NA	<0.07	NA	0.57F	4.34	<0.08
CS-WB04-LGR-11	9-Jun-16	<0.12	<0.07	<0.08	<0.05	<0.06	<0.08
	20-Sep-16	NA	<0.07	NA	<0.05	1.41F	<0.08
BOLD	≥ MDL						
BOLD	≥ RL						
BOLD	≥ MCL						

Data Qualifiers

F = The analyte was positively identified but the associated numerical value is below the RL

* dilution was performed for this sample.

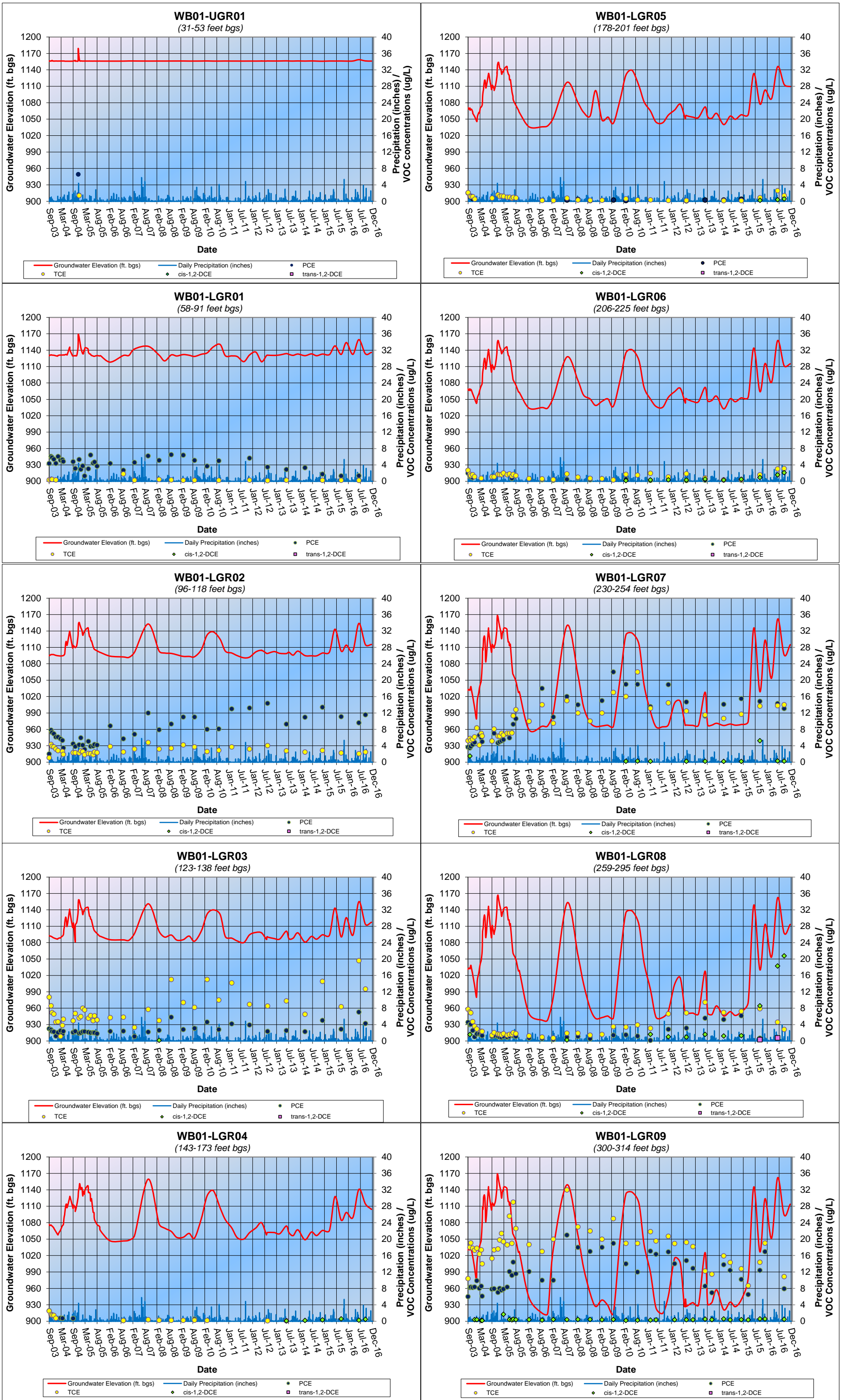
NA = not analyzed

All values are reported in µg/L.

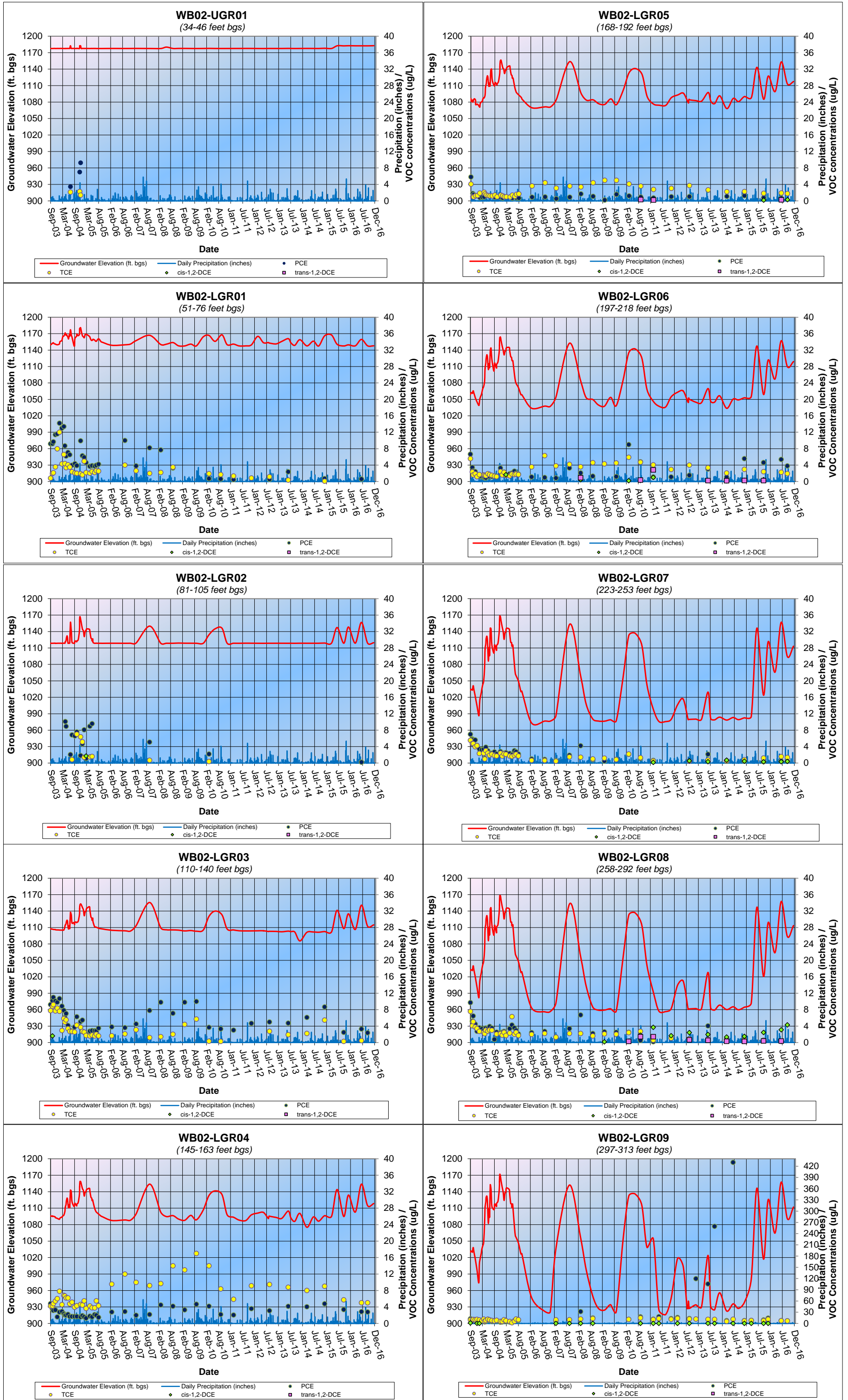
APPENDIX D

CUMULATIVE WESTBAY® ANALYTICAL GRAPHS

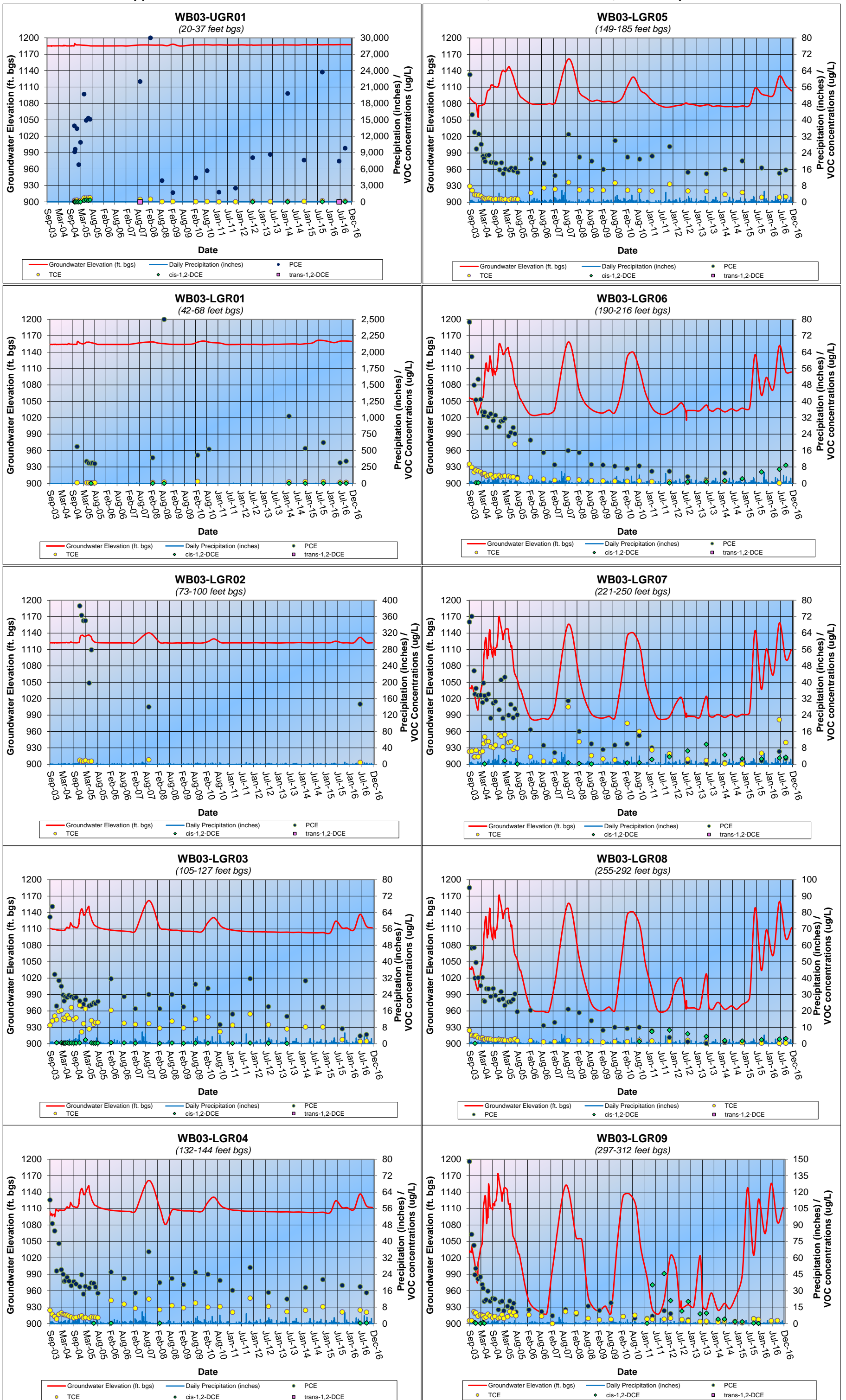
Appendix D.1 - CS-WB01 Culmulative VOC Concentrations, Groundwater Level, and Precipitation



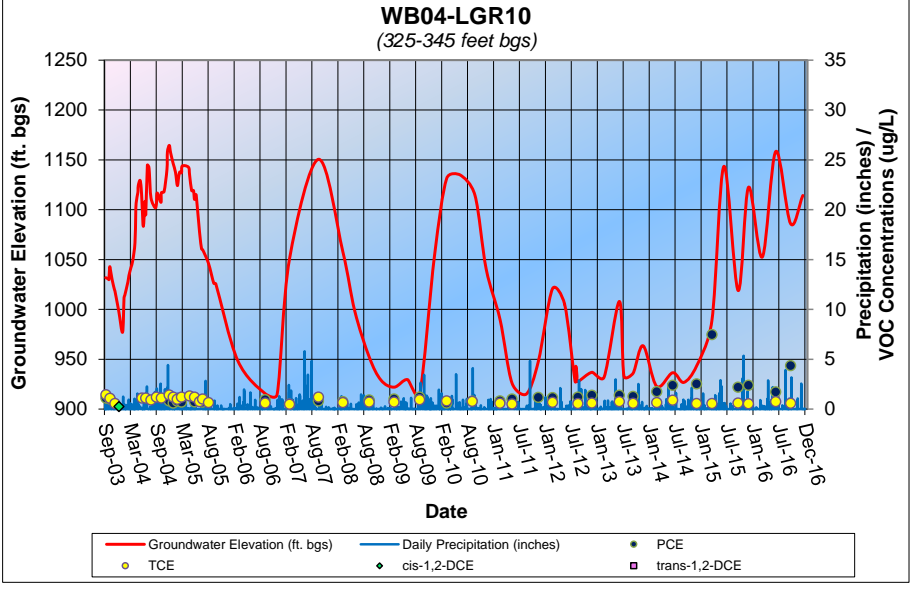
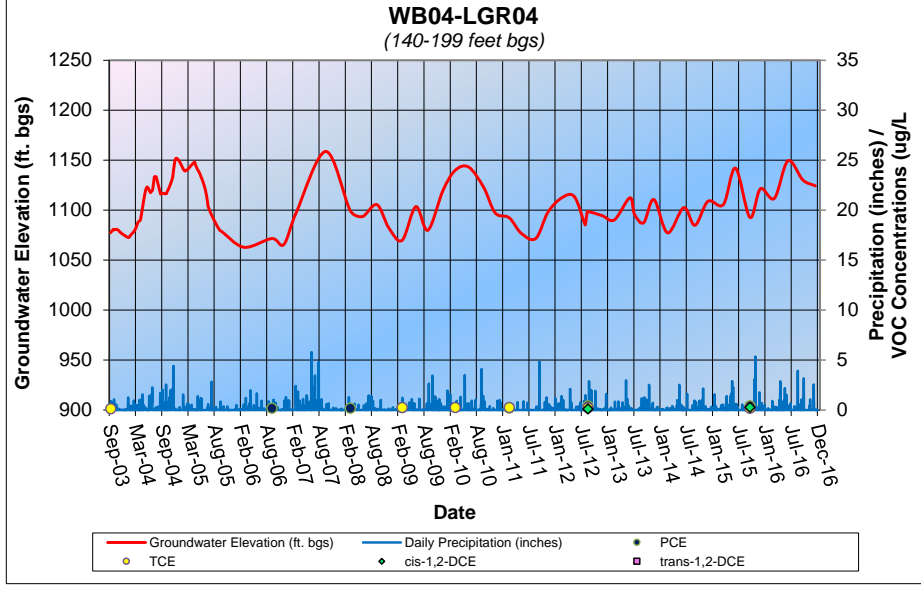
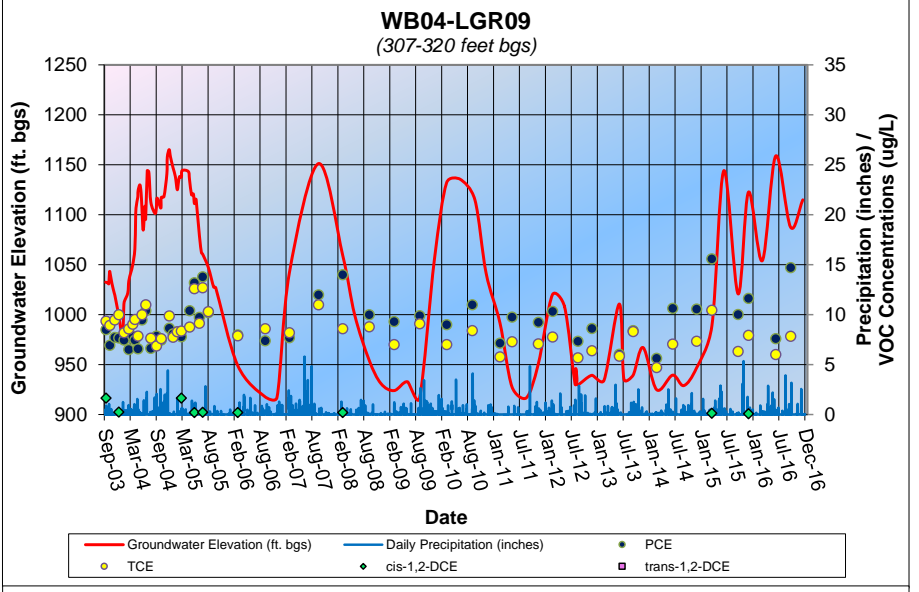
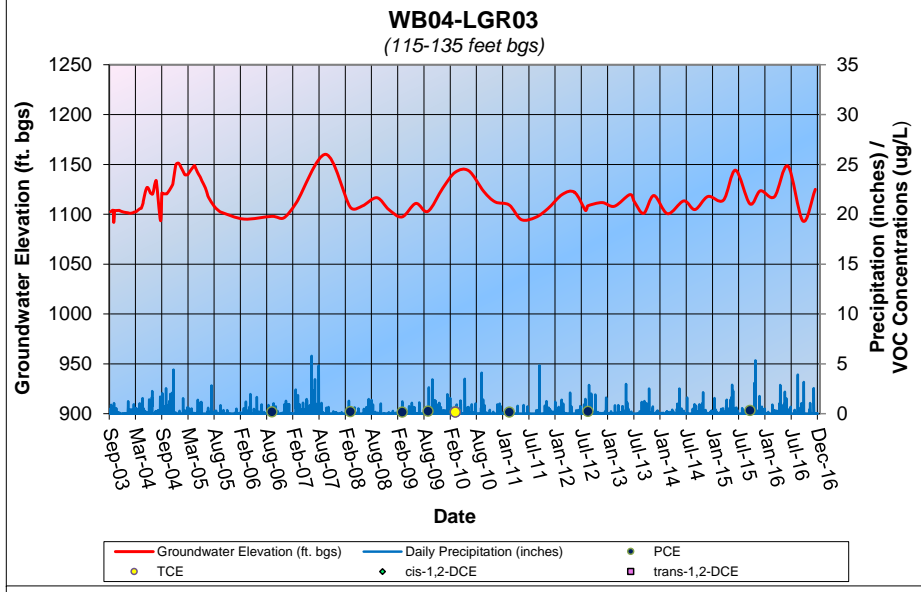
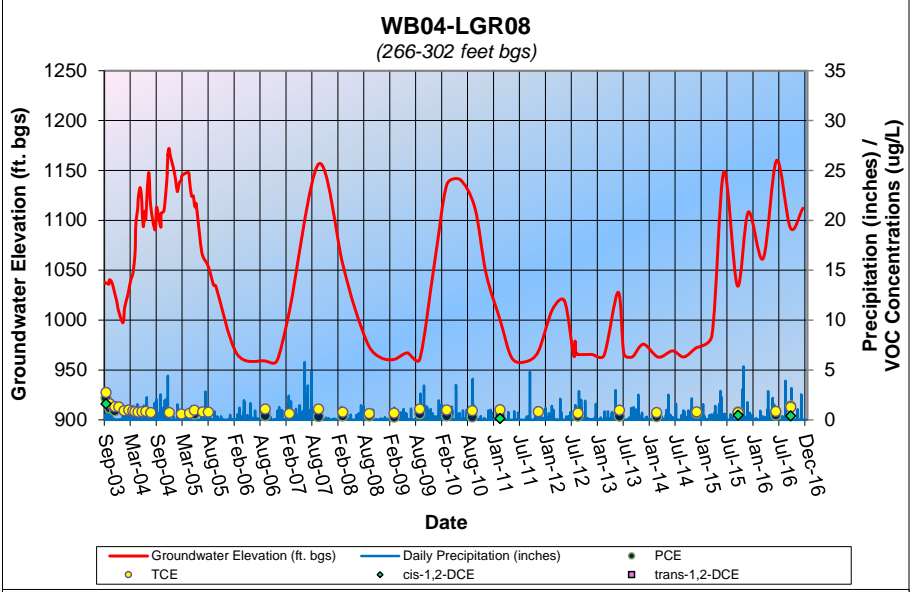
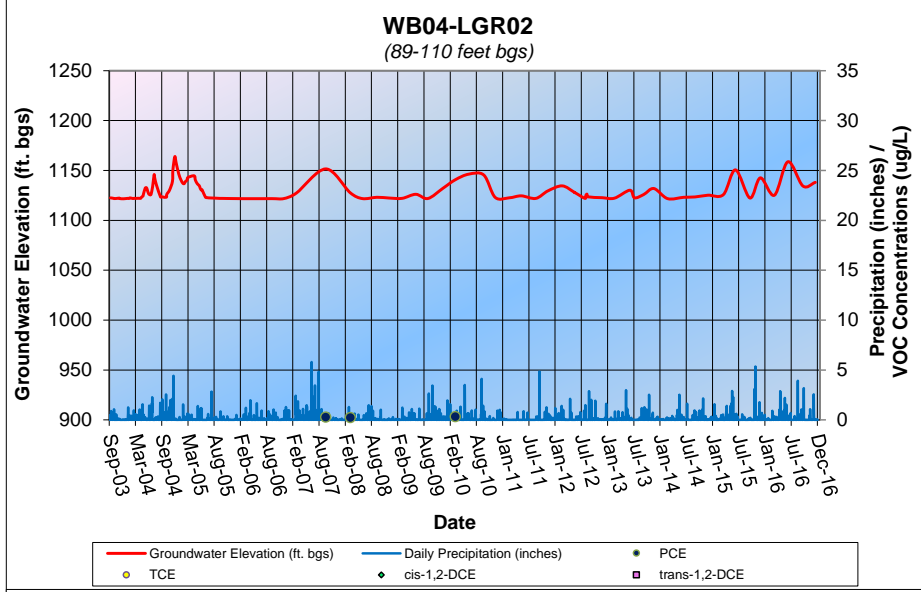
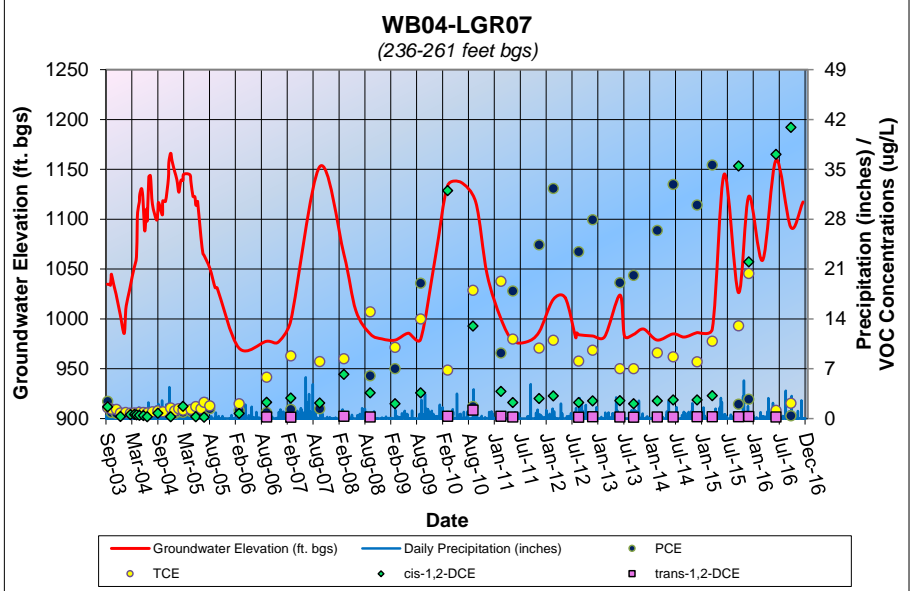
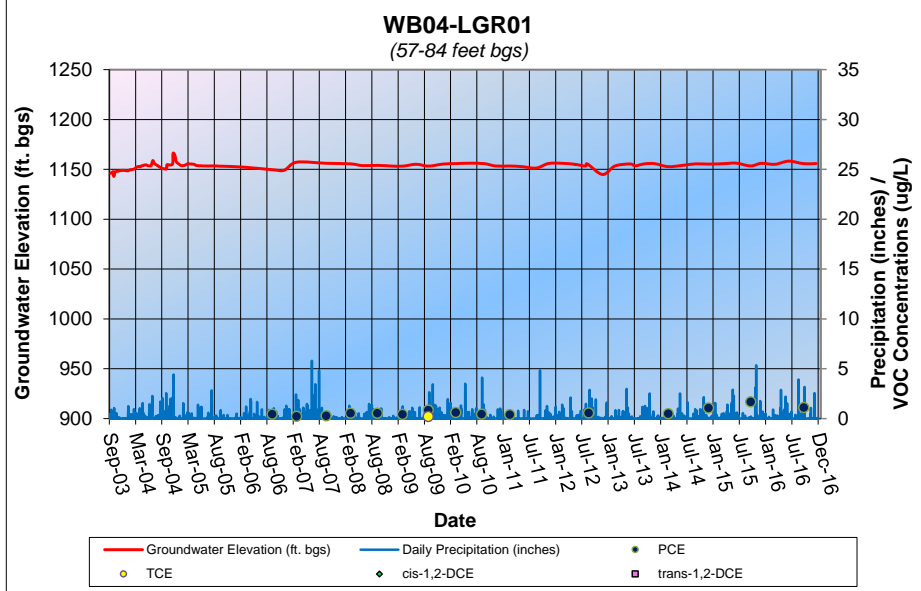
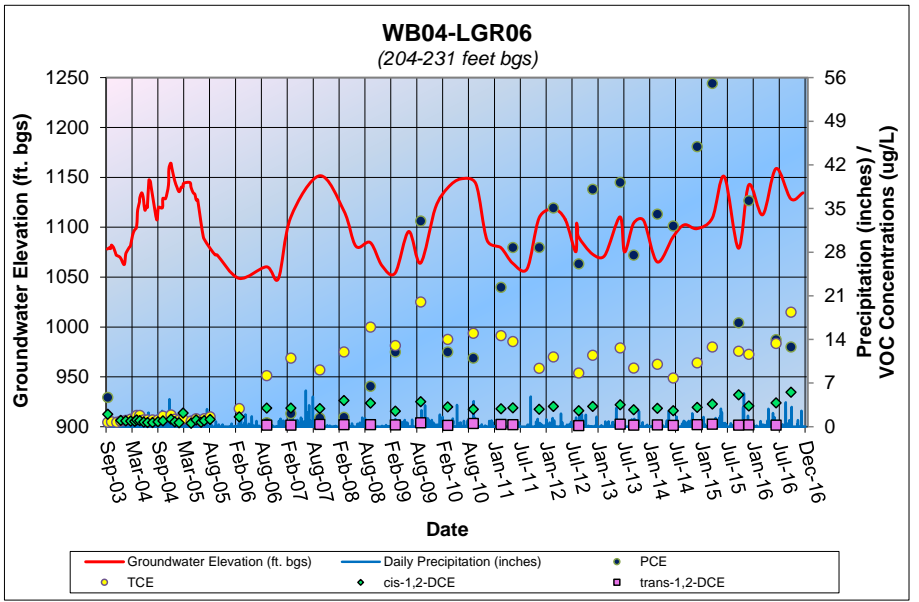
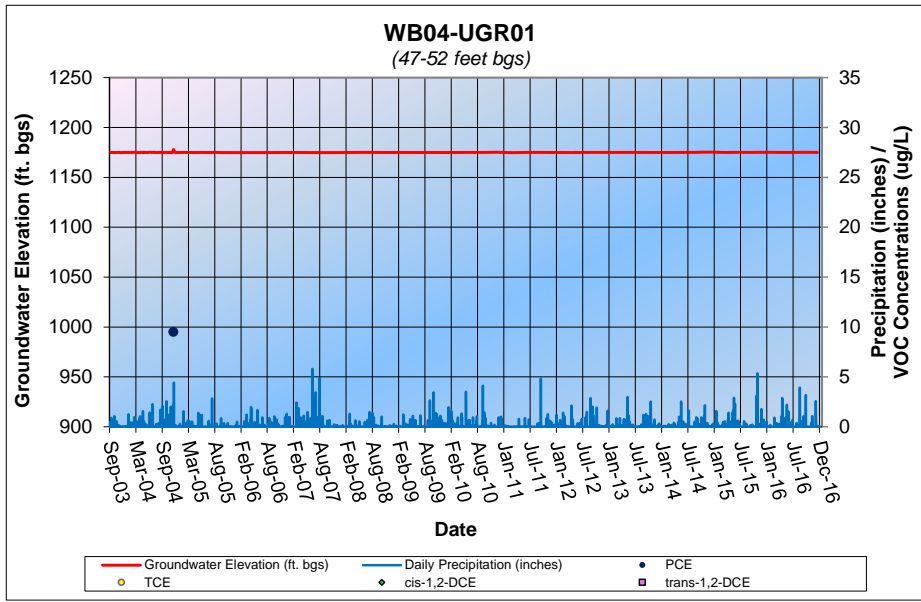
Appendix D.2 - CS-WB02 Culmulative VOC Concentrations, Groundwater Level, and Precipitation



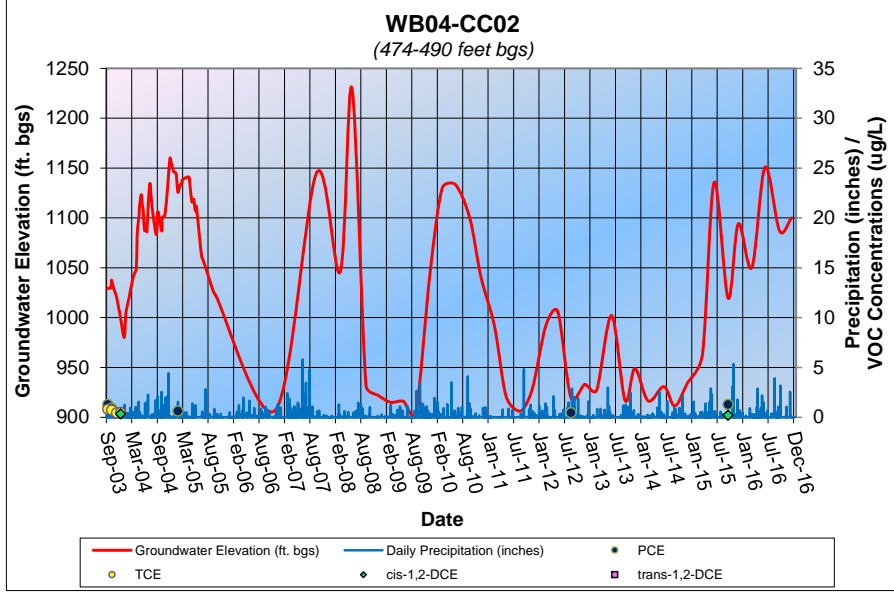
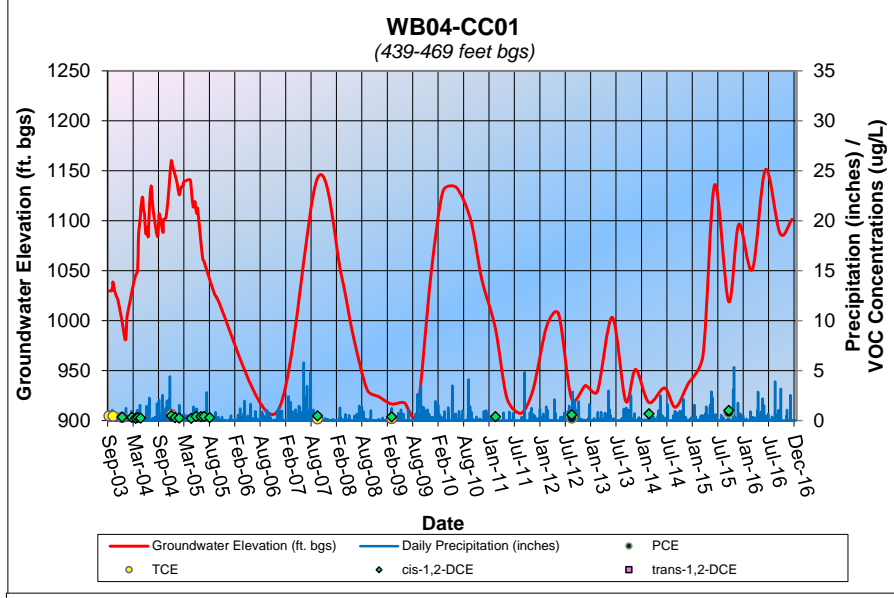
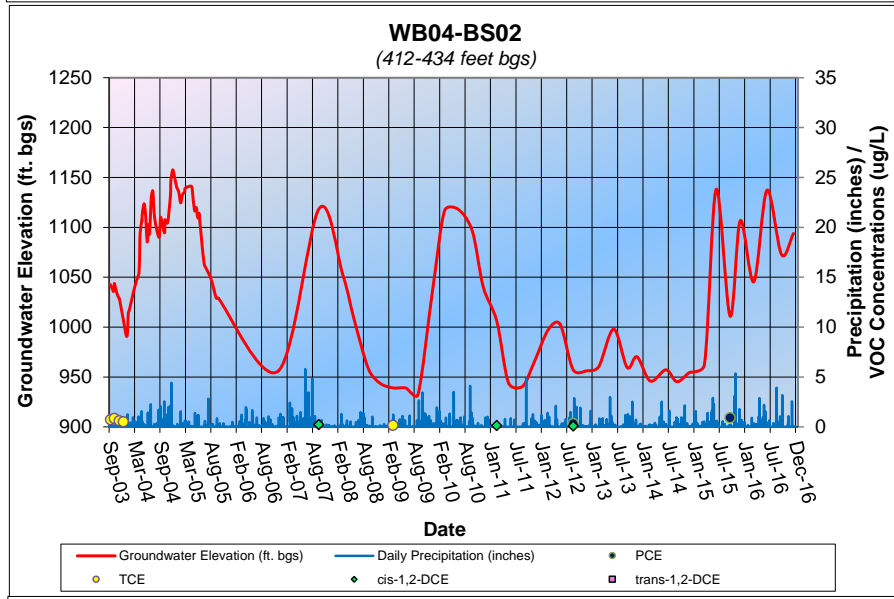
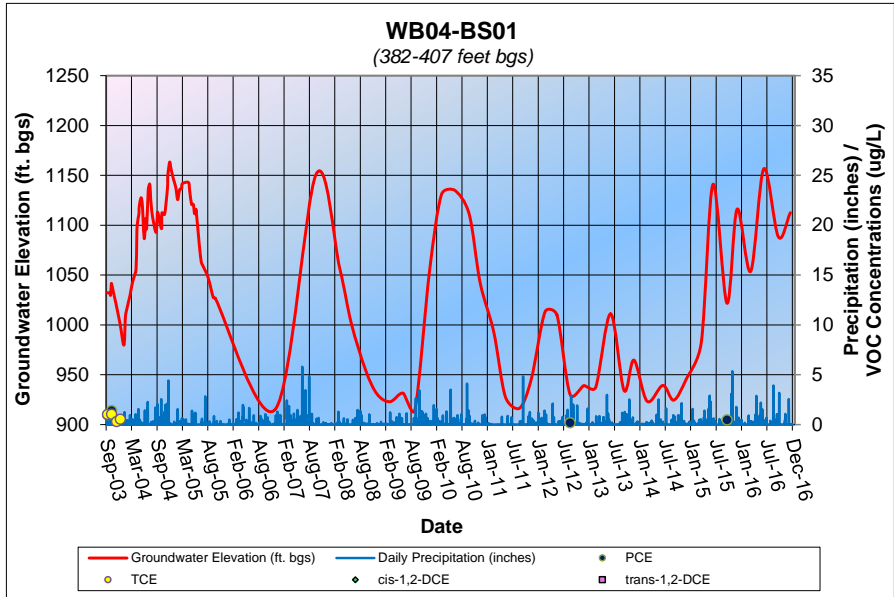
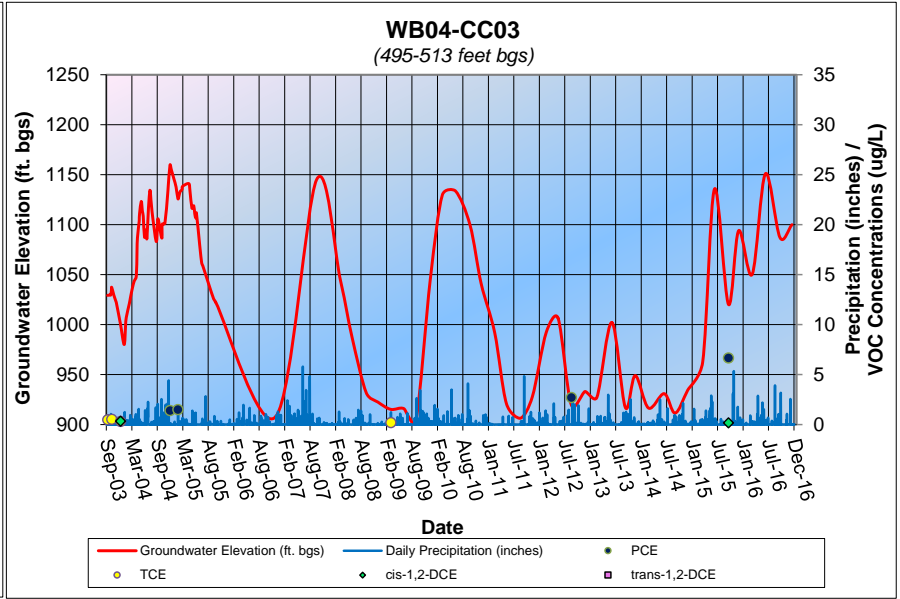
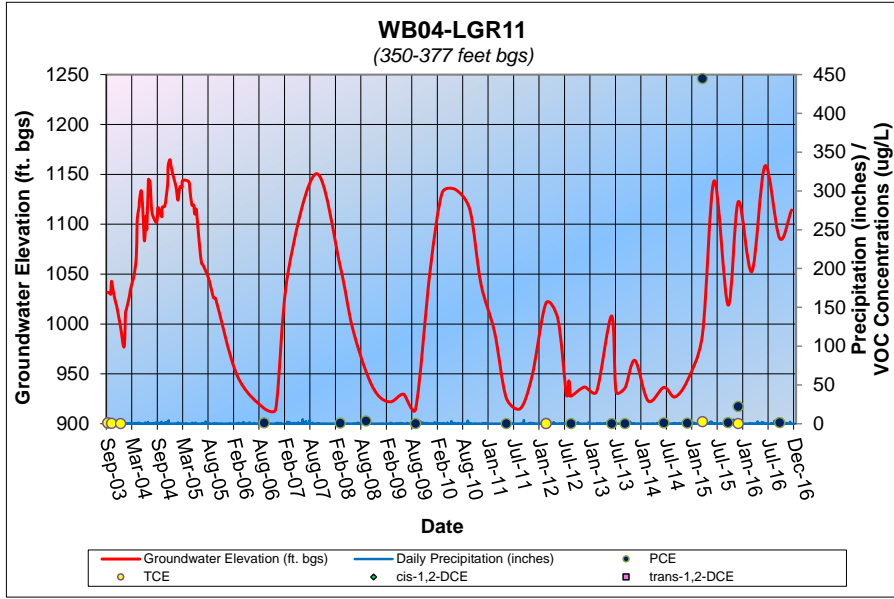
Appendix D.3 - CS-WB03 Culmulative VOC Concentrations, Groundwater Level, and Precipitation



Appendix D.4 - CS-WB04 Culmulative VOC Concentrations, Groundwater Level, and Precipitation

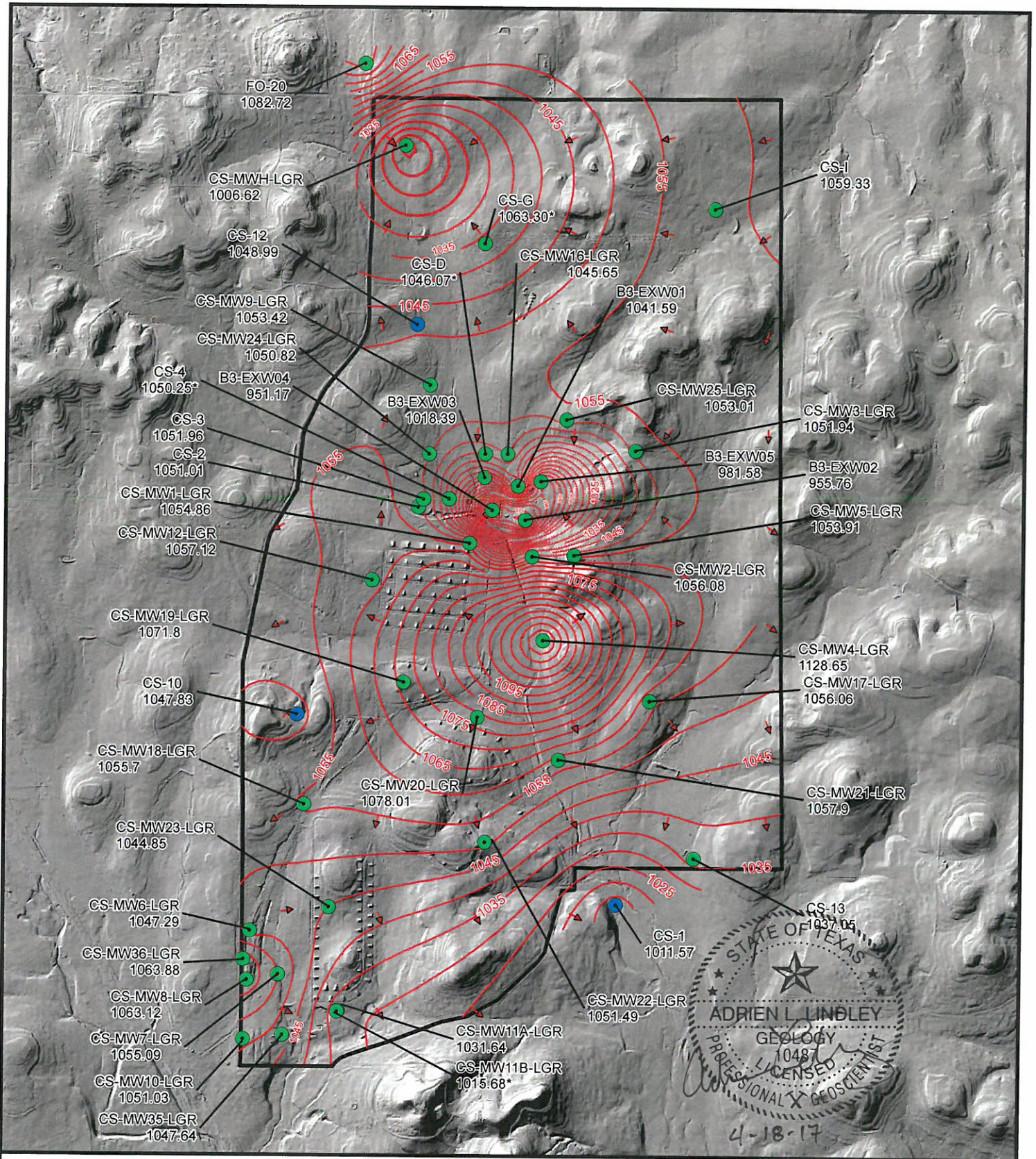


Appendix D.4 - CS-WB04 Culmulative VOC Concentrations, Groundwater Level, and Precipitation



APPENDIX E

POTENTIOMETRIC MAPS FOR MARCH, JUNE, SEPTEMBER, DECEMBER 2016



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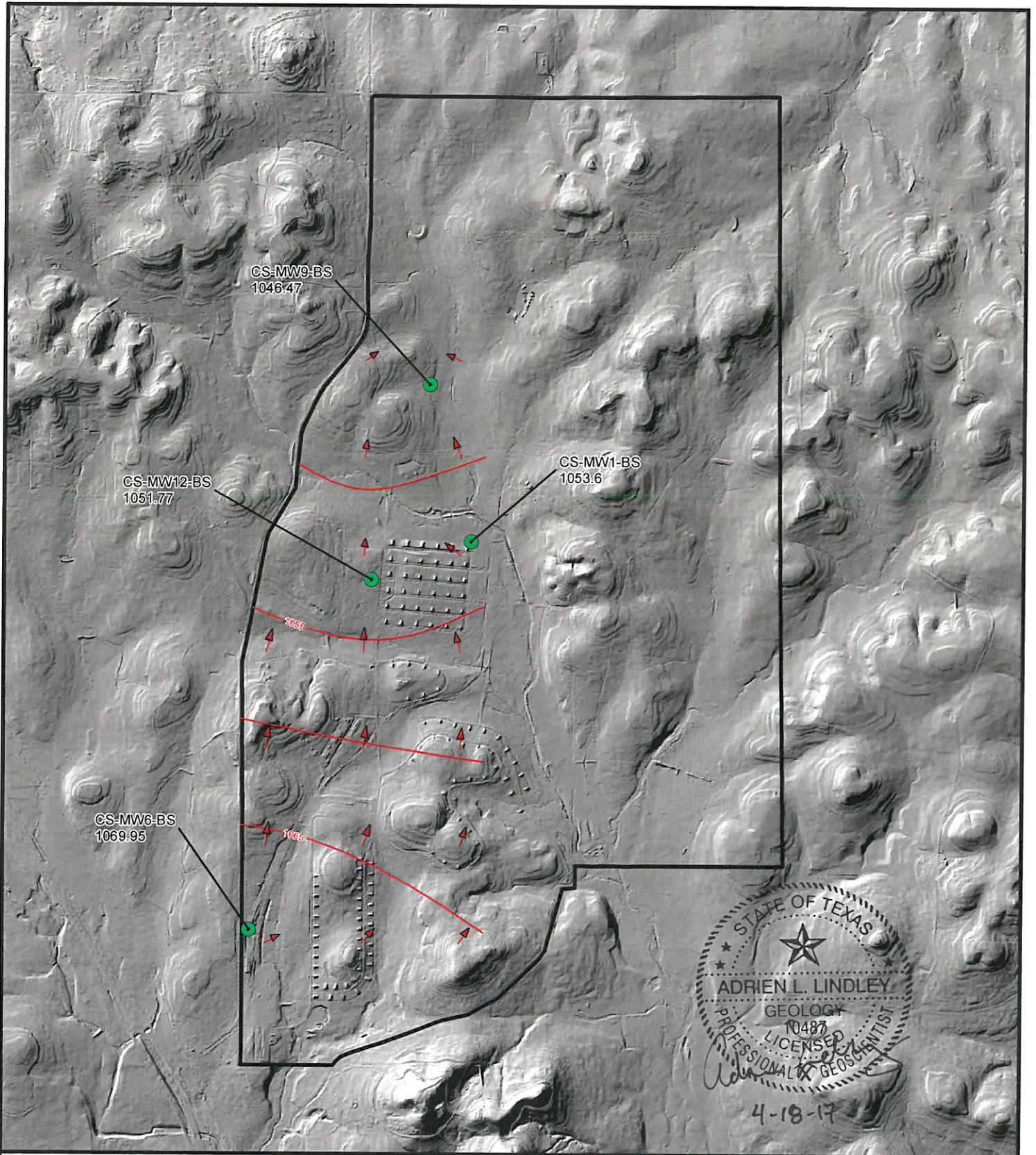


0 0.5 Miles

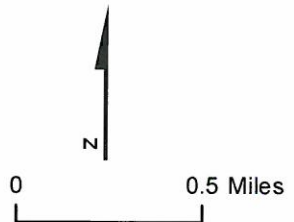
- Flow direction
- LGR Groundwater Contours
- Outer fence
- LGR Wells and groundwater elevation (ft above msl)
- Drinking water wells (may be completed in LGR, BS, and/or CC)

* Not a fully penetrating well into LGR. Groundwater elevation not used in contouring

Figure E.1
 March 2016 Potentiometric Surface Map, LGR Wells
 Camp Stanley Storage Activity
PARSONS

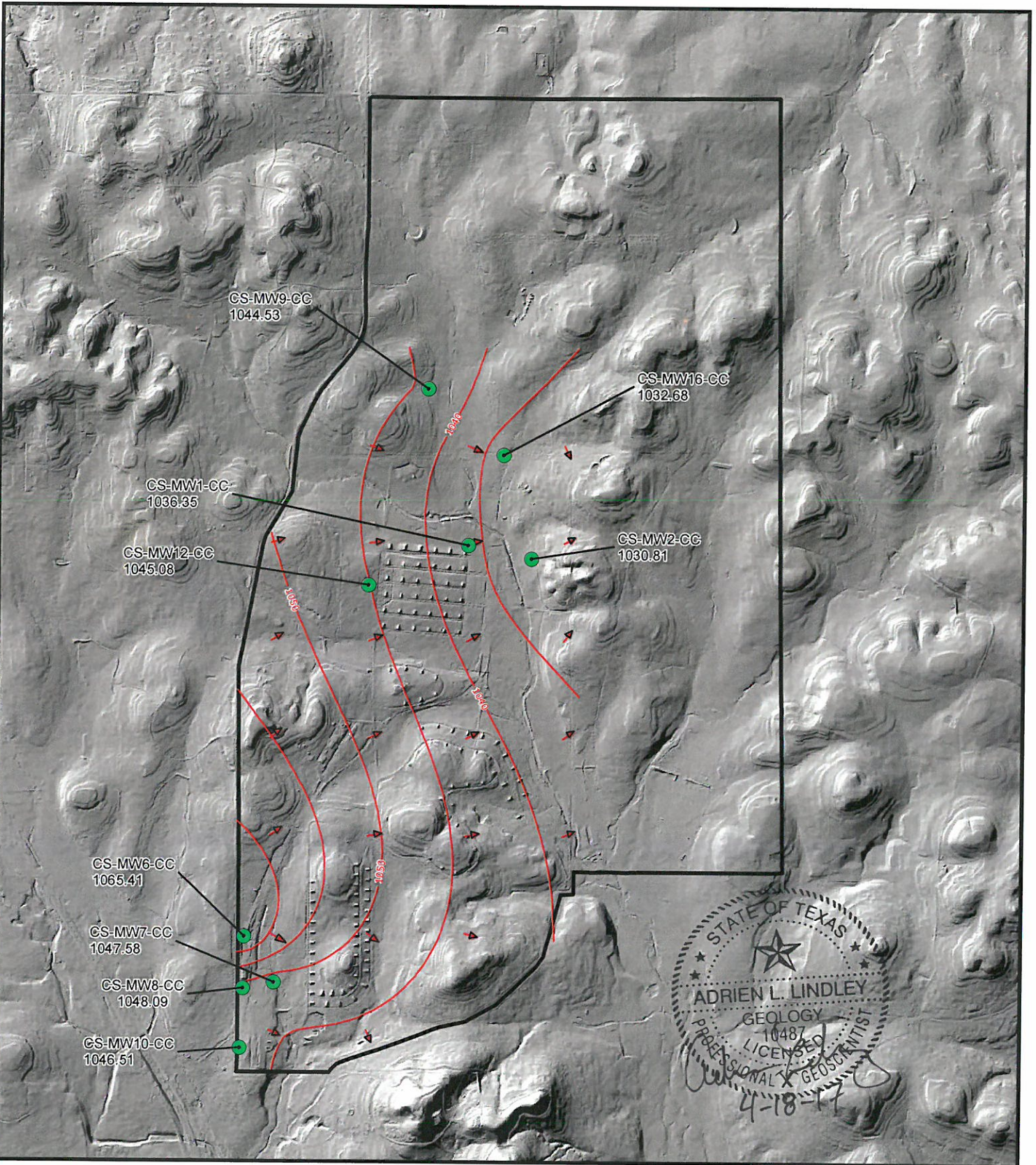


STATE OF TEXAS
 ADRIEN L. LINDLEY
 GEOLOGY
 10487
 LICENSED
 PROFESSIONAL GEOSCIENTIST
 4-18-17



- Flow direction
- Outer fence
- BS Groundwater Contours
- BS Wells and groundwater elevation (ft above msl)

Figure E.2
 March 2016 Potentiometric
 Surface Map, BS Wells
 Camp Stanley Storage Activity
PARSONS



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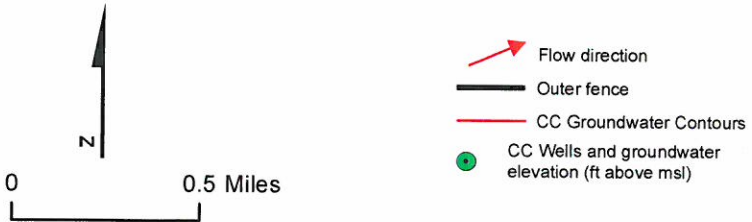
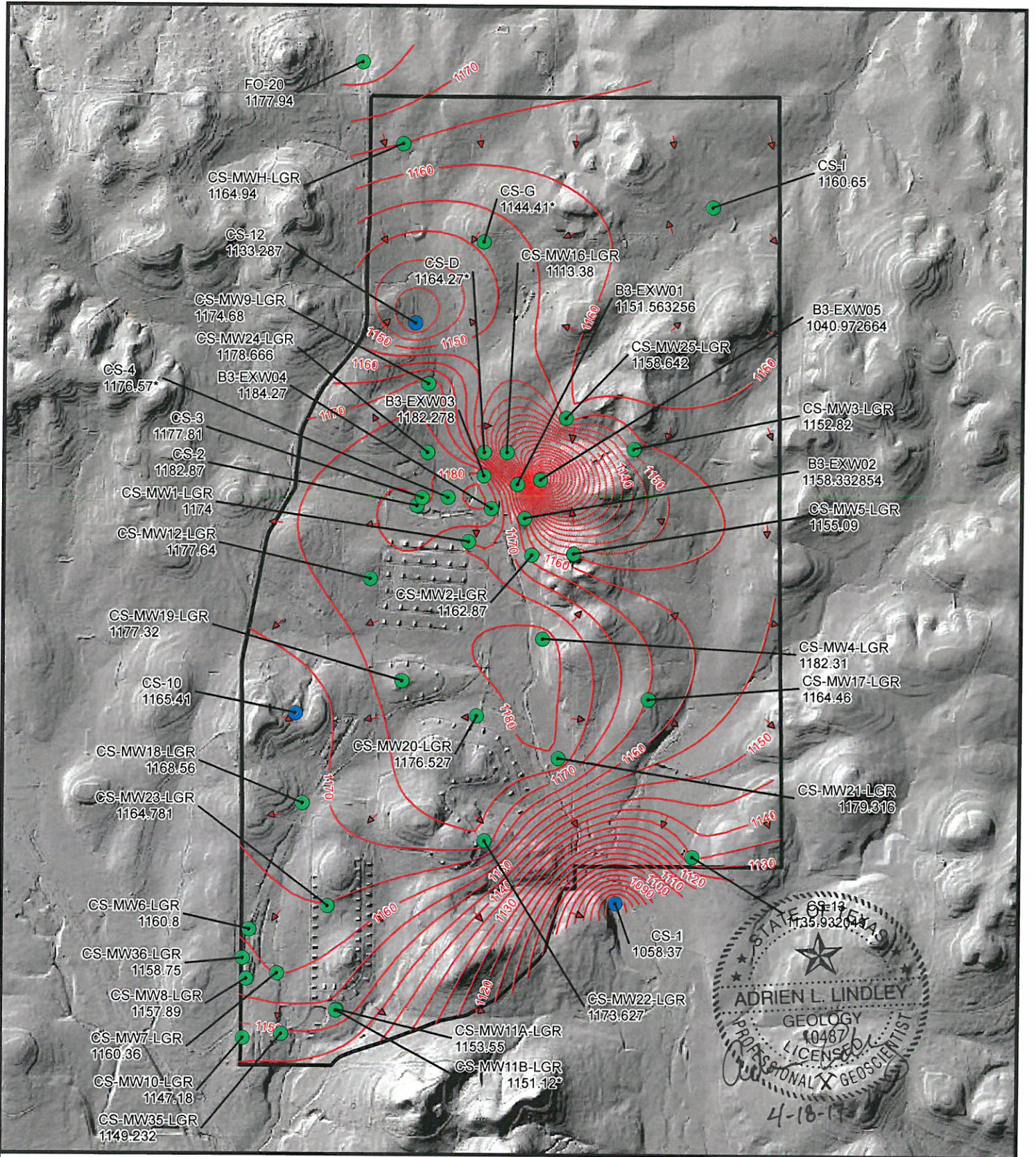


Figure E.3
 March 2016 Potentiometric
 Surface Map, CC Wells
 Camp Stanley Storage Activity
PARSONS

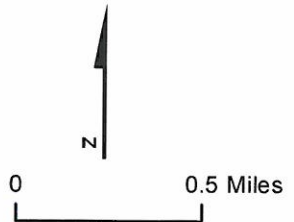
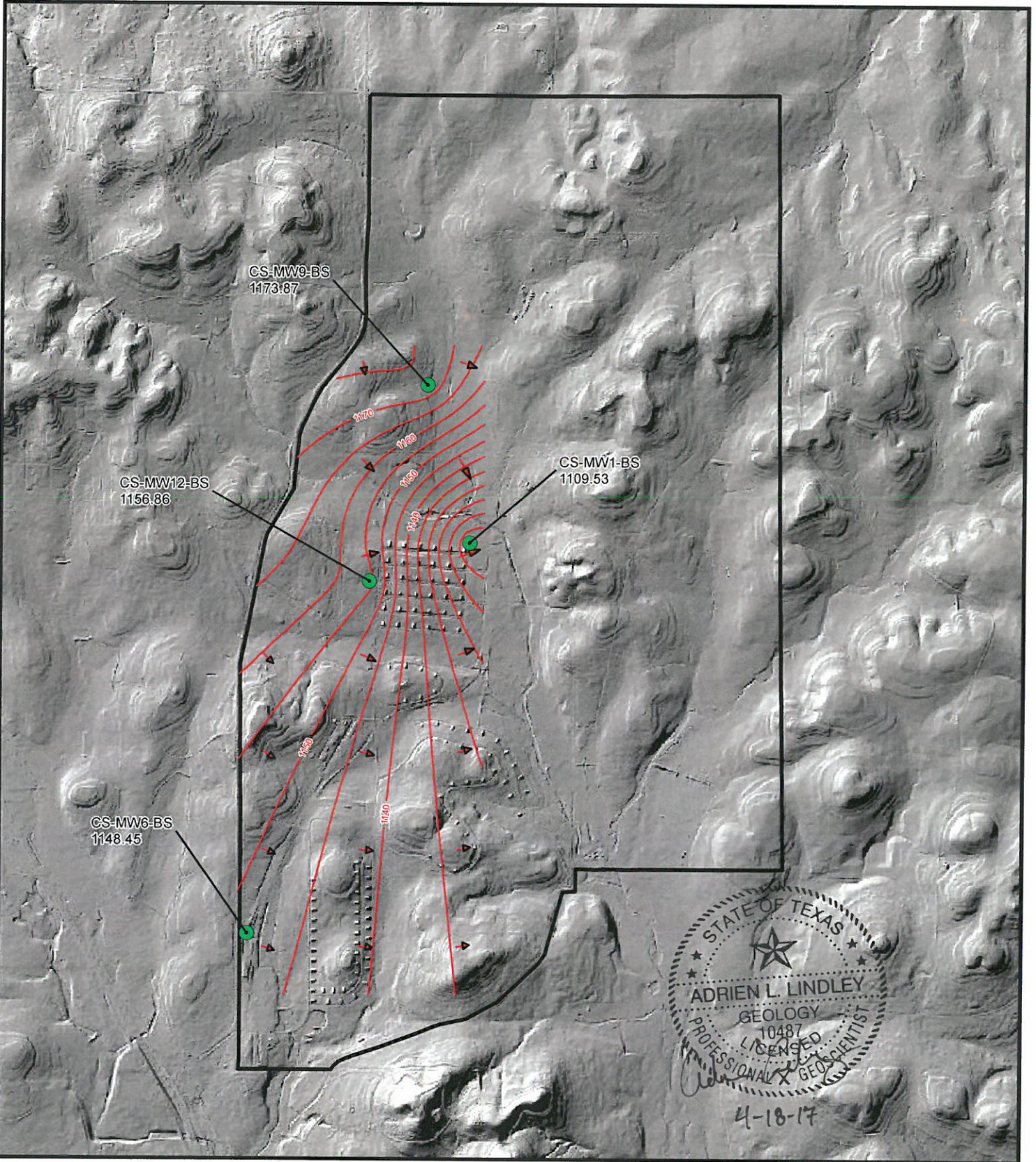


- Flow direction
- LGR Groundwater Contours
- Outer fence
- LGR Wells and groundwater elevation (ft above msl)
- Drinking water wells (may be completed in LGR, BS, and/or CC)

* Not a fully penetrating well into LGR. Groundwater elevation not used in contouring

Figure E.4
 June 2016 Potentiometric
 Surface Map, LGR Wells
 Camp Stanley Storage Activity

PARSONS

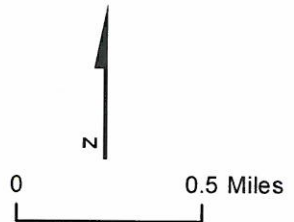
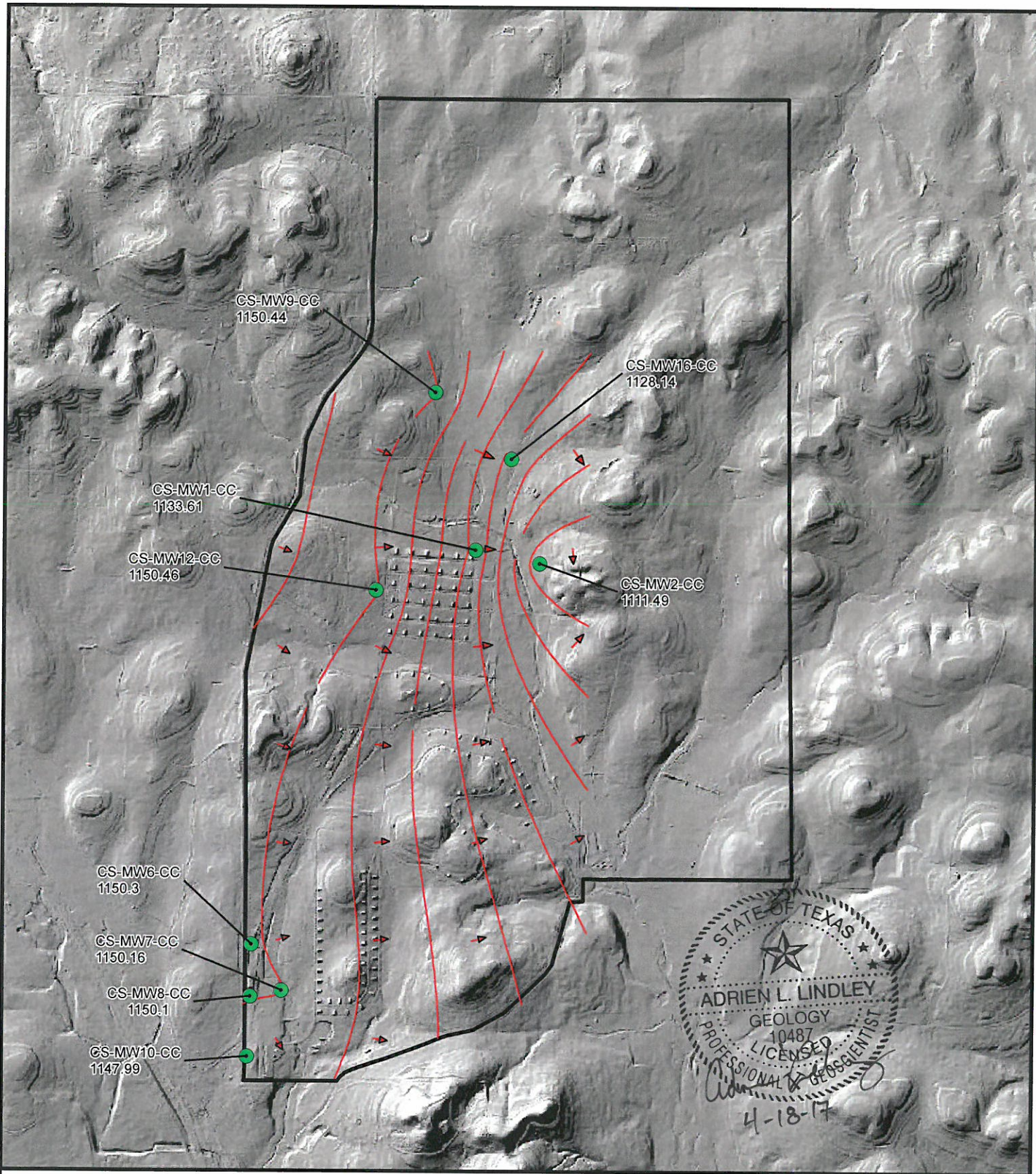


- Flow direction
- Outer fence
- BS Groundwater Contours
- BS Wells and groundwater elevation (ft above msl)

Figure E.5
 June 2016 Potentiometric
 Surface Map, BS Wells
 Camp Stanley Storage Activity

PARSONS

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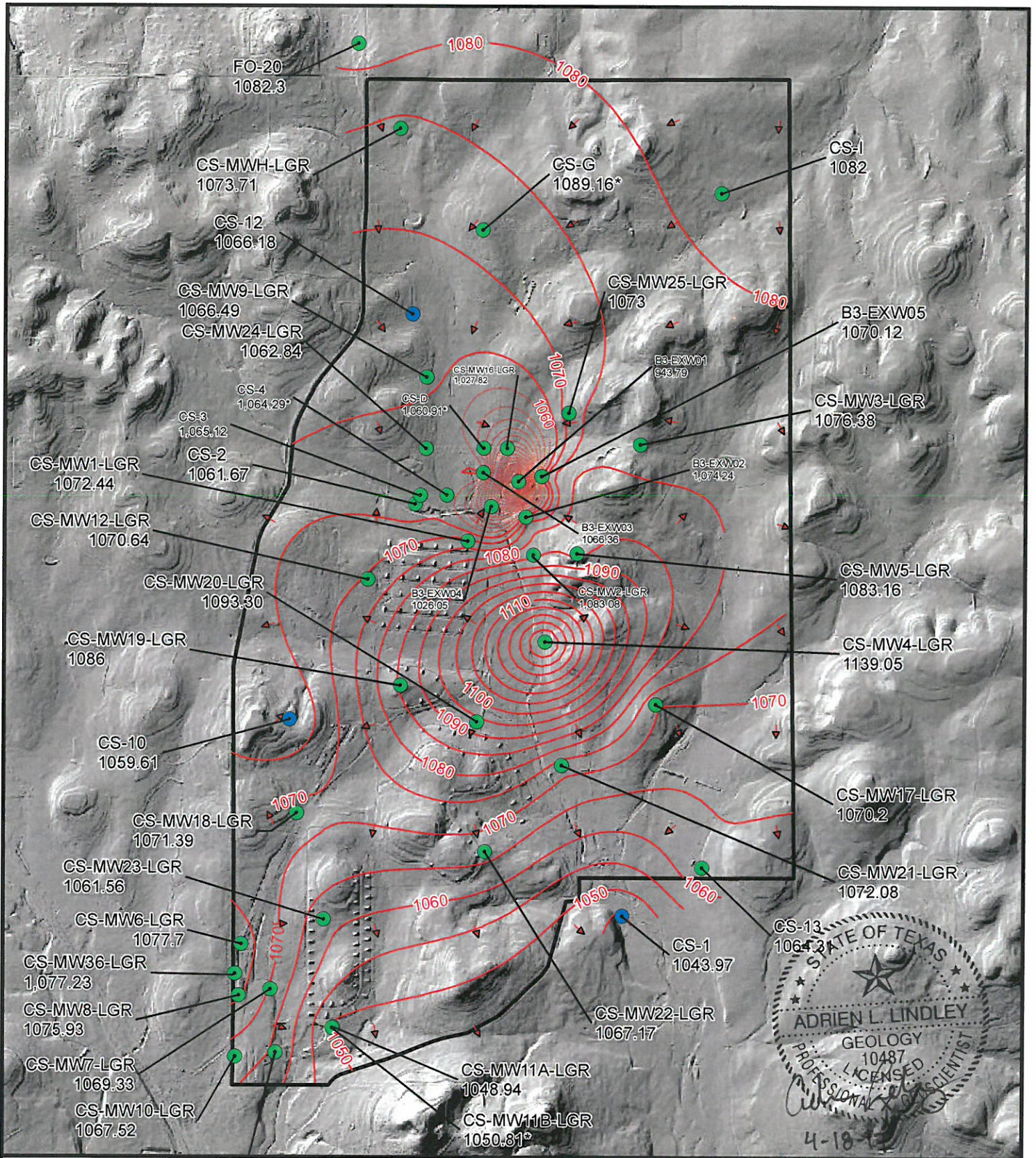
- Flow direction
- Outer fence
- CC Groundwater Contours
- CC Wells and groundwater elevation (ft above msl)

Figure E.6

June 2016 Potentiometric
Surface Map, CC Wells
Camp Stanley Storage Activity

PARSONS

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	Flow direction	LGR Groundwater Contours
	Outer fence	LGR Wells and groundwater elevation (ft above msl)
Drinking water wells (may be completed in LGR, BS, and/or CC)		

0 0.5 Miles

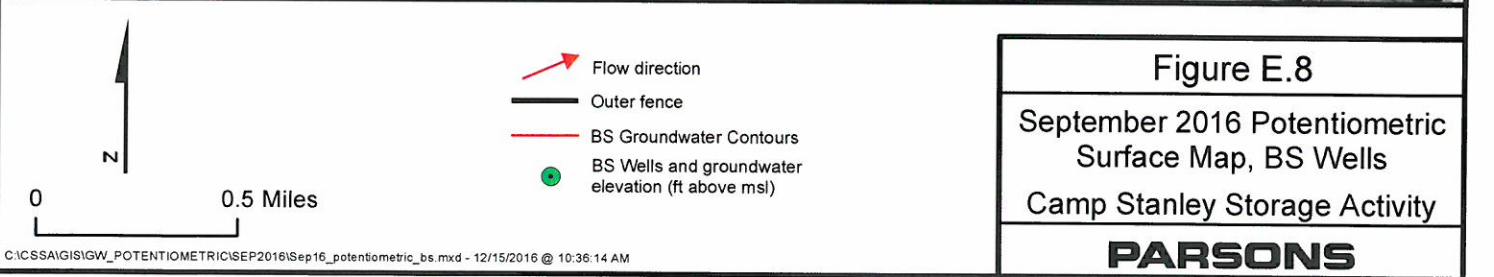
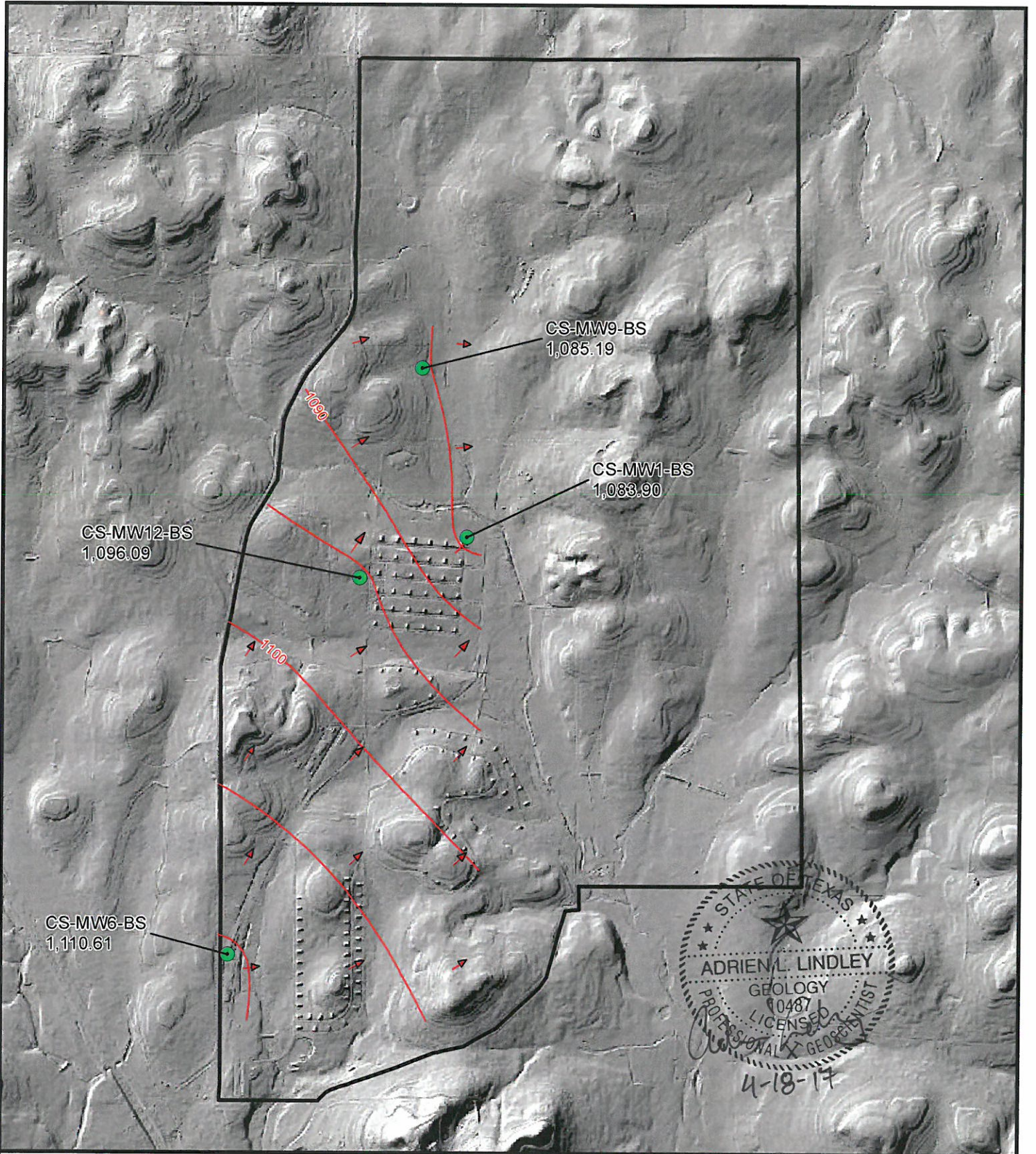
* Not a fully penetrating well into LGR. Groundwater elevation not used in contouring

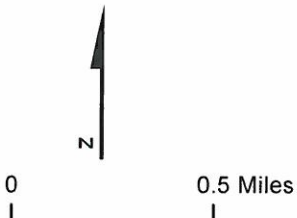
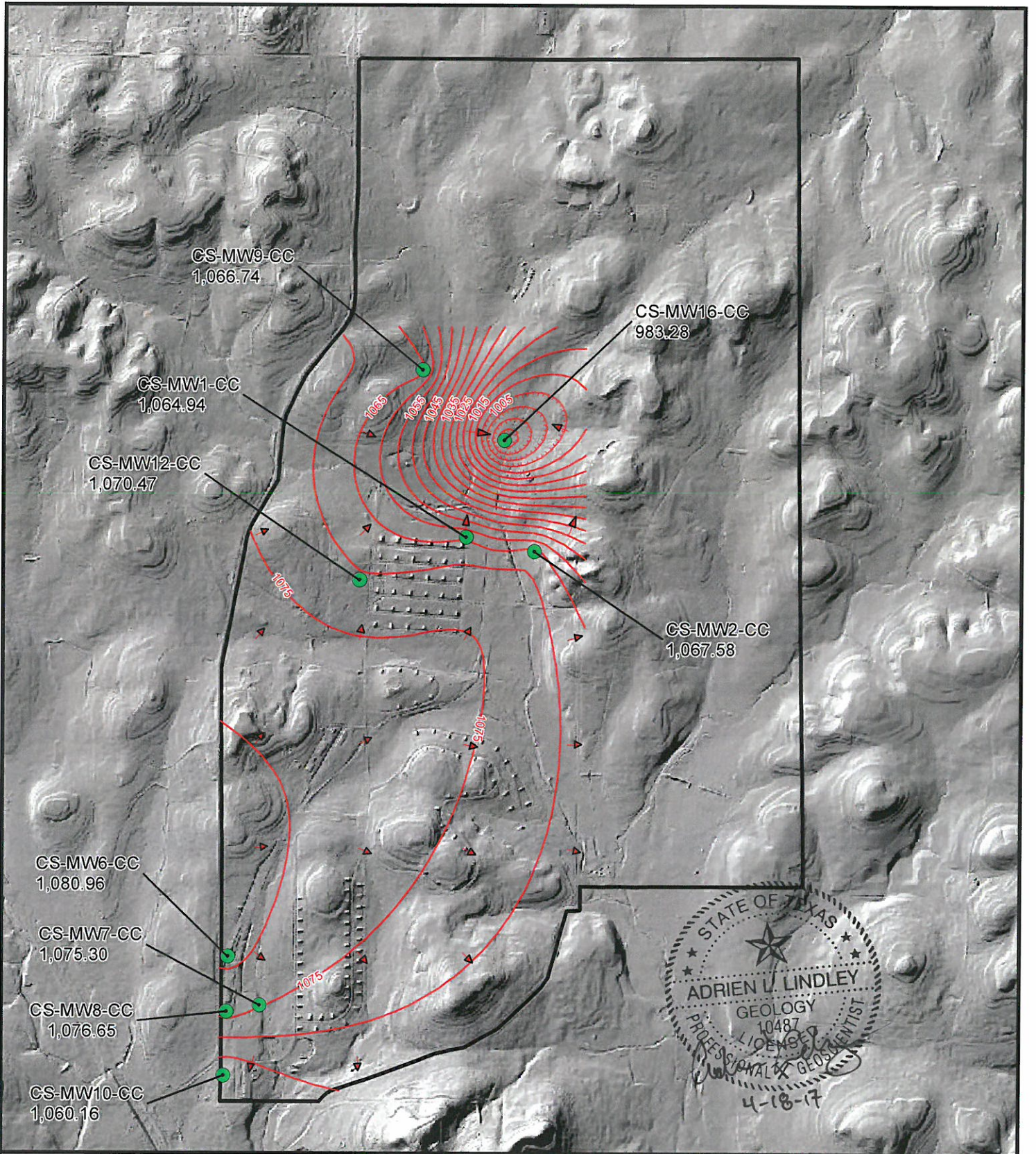
Figure E.7

September 2016 Potentiometric Surface Map, LGR Wells

Camp Stanley Storage Activity

PARSONS





- Flow direction
- Outer fence
- CC Groundwater Contours
- CC Wells and groundwater elevation (ft above msl)

Figure E.9
 September 2016 Potentiometric
 Surface Map, CC Wells
 Camp Stanley Storage Activity

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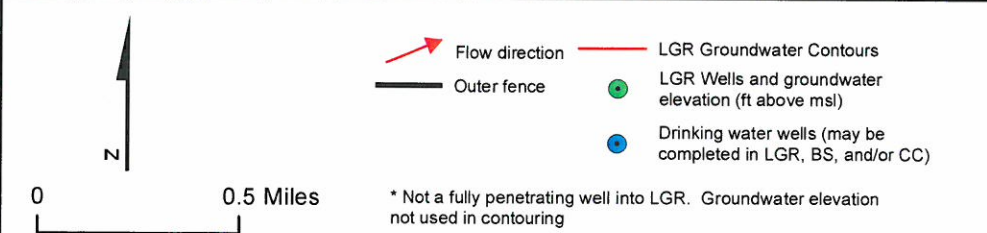
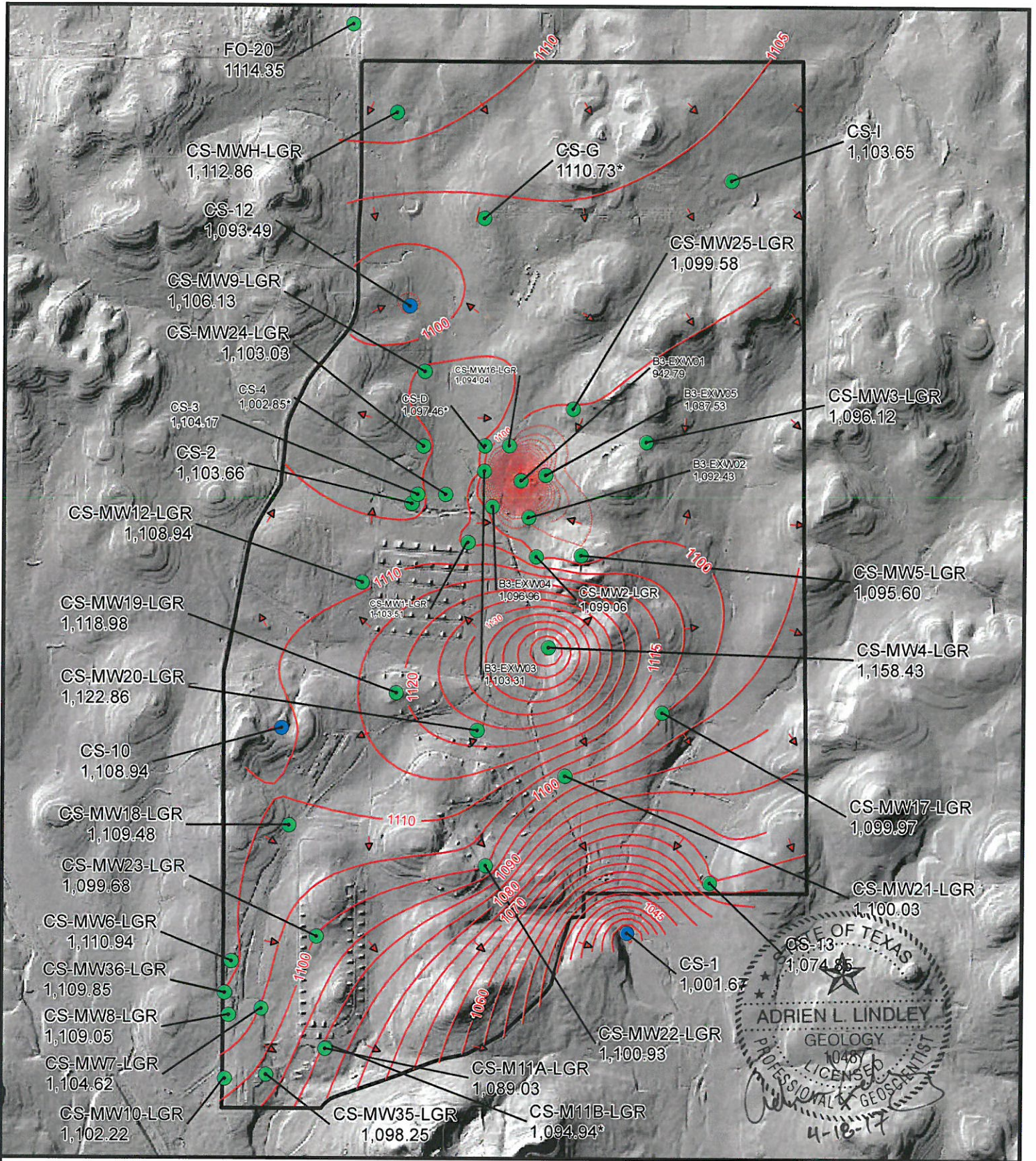
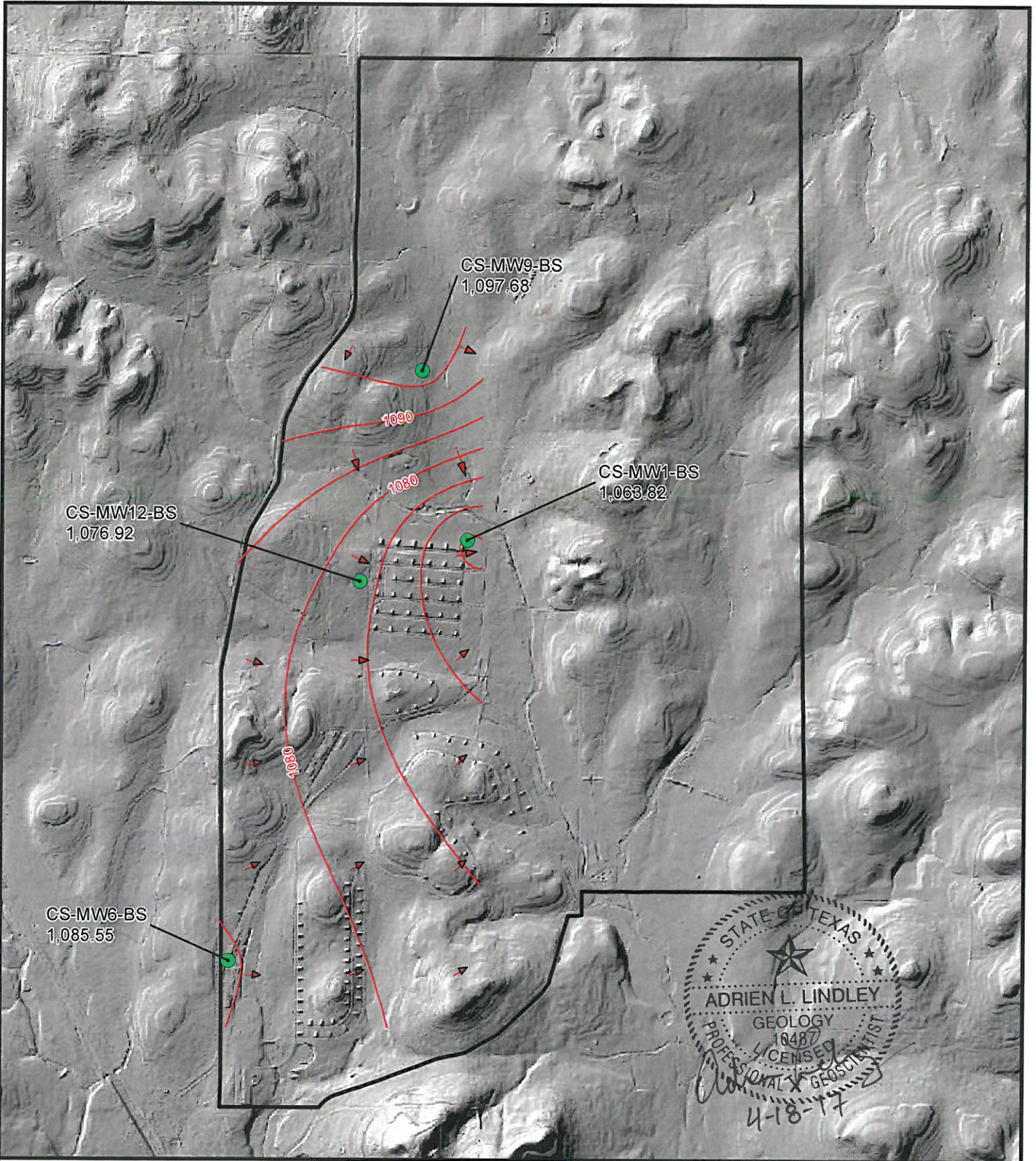
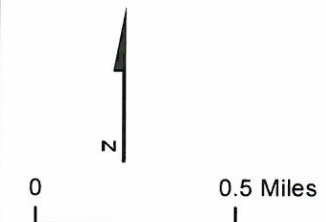


Figure E.10
 December 2016 Potentiometric
 Surface Map, LGR Wells
 Camp Stanley Storage Activity
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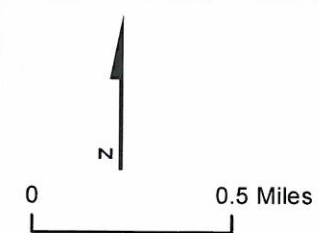
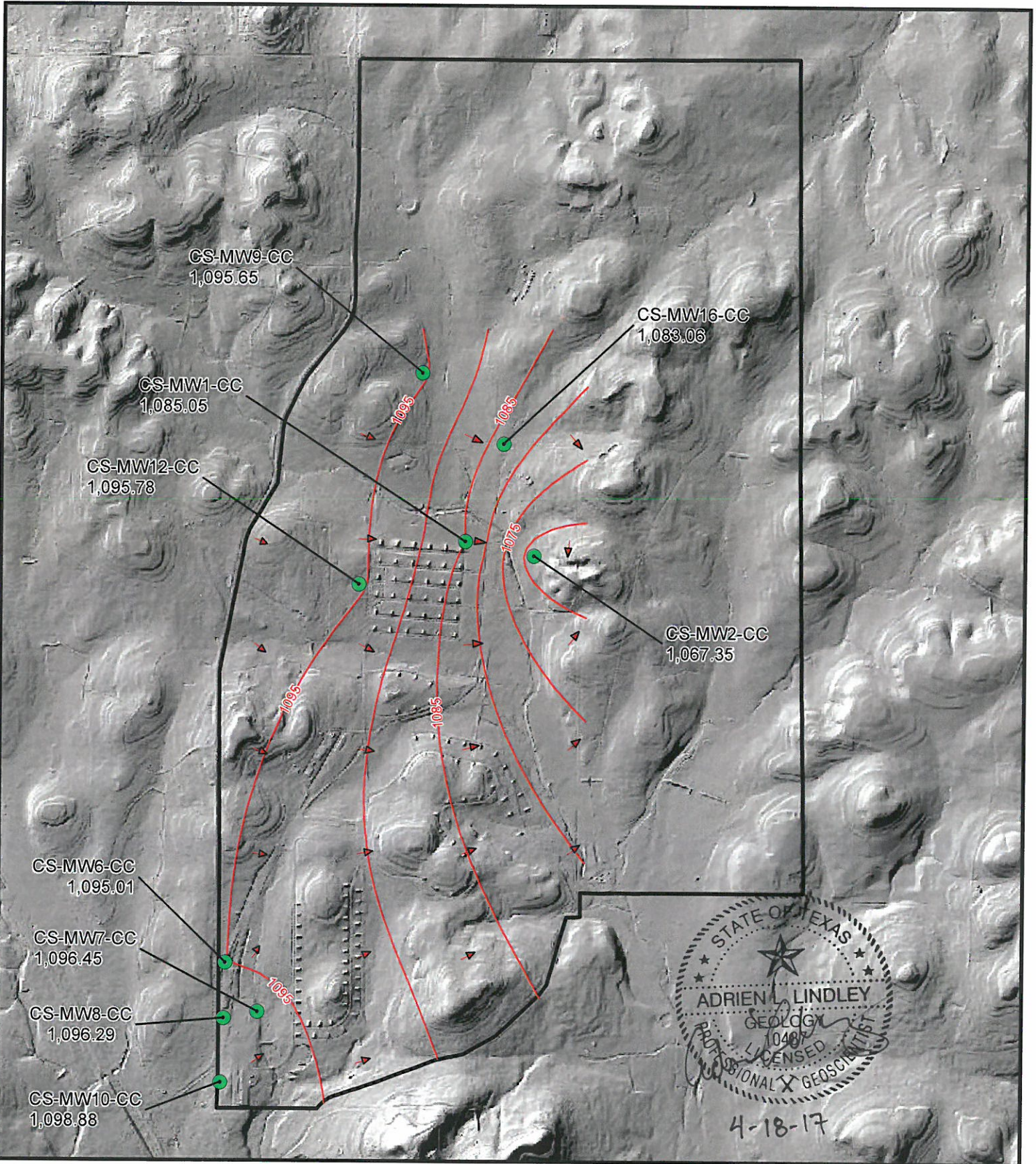


STATE OF TEXAS
 ADRIEN L. LINDLEY
 GEOLOGY
 LICENSED
 PROFESSIONAL GEOSCIENTIST
 4-18-17



- Flow direction
- Outer fence
- BS Groundwater Contours
- BS Wells and groundwater elevation (ft above msl)

Figure E.11
 December 2016 Potentiometric
 Surface Map, BS Wells
 Camp Stanley Storage Activity
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- Flow direction
- Outer fence
- CC Groundwater Contours
- CC Wells and groundwater elevation (ft above msl)

Figure E.12
 December 2016 Potentiometric
 Surface Map, CC Wells
 Camp Stanley Storage Activity

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APPENDIX F

2016 QUARTERLY OFF-POST GROUNDWATER ANALYTICAL RESULTS

Appendix F
2016 Quarterly Off-Post Groundwater Monitoring Analytical Results

Well ID	Sample Date	1,1-Dichloroethene (ug/L)	cis -1,2-Dichloroethene (ug/L)	trans -1,2-Dichloroethene (ug/L)	Tetra-chloroethene (ug/L)	Trichloroethene (ug/L)	Vinyl chloride (ug/L)	pH	Temperature (°C)	Specific Conductivity (mS)
Maximum Contaminant Level (MCL)		7	70	100	5	5	2			
BSR-04	9/14/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.77	21.99	0.847
HS-1	9/7/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.12	23.17	0.714
I10-8 <i>Duplicate</i>	9/14/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.87	22.38	0.610
	9/14/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.87	22.38	0.610
I10-10	9/7/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.02	23.56	0.600
JW-5	9/12/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.97	25.26	0.555
JW-7	9/8/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.90	21.98	0.585
JW-8	9/8/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.93	21.96	0.569
JW-20	9/8/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	7.09	21.49	0.699
LS-1	9/7/2016	NA	0.07U	NA	0.25F	0.05U	0.08U	7.42	21.83	0.434
LS-4	9/7/2016	NA	0.07U	NA	0.16F	0.05U	0.08U	7.07	22.69	0.622
LS-5	3/7/2016	0.12U	0.07U	0.08U	1.12F	2.5	0.08U	7.01	22.57	0.632
	6/6/2016	0.12U	0.07U	0.08U	0.88F	1.79	0.08U	6.97	22.72	0.650
	9/6/2016	NA	0.07U	NA	0.75F	1.85	0.08U	6.94	22.63	0.620
	12/5/2016	NA	0.07U	NA	1.06F	2.16	0.08U	6.92	22.26	0.657
LS-5-A2	3/7/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
	9/6/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	NA	NA	NA
LS-6	3/7/2016	0.12U	0.07U	0.08U	0.76F	1.47	0.08U	6.90	22.36	0.684
	6/6/2016	0.12U	0.07U	0.08U	0.72F	0.89F	0.08U	6.81	22.29	0.741
	9/6/2016	NA	0.07U	NA	0.88F	0.05U	0.08U	6.78	21.98	0.723
	12/5/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.63	21.98	0.741
LS-6-A2	3/7/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
	9/6/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	NA	NA	NA
LS-7	3/7/2016	0.12U	0.07U	0.08U	1.63	0.28F	0.08U	6.89	22.58	0.672
	6/6/2016	0.12U	0.07U	0.08U	0.62F	0.05U	0.08U	6.77	22.30	0.723
	9/6/2016	NA	0.07U	NA	0.57F	0.05U	0.08U	6.75	22.32	0.682
	12/5/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.65	22.96	0.659
LS-7-A2	3/7/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
	9/6/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	NA	NA	NA
OFR-3 <i>Duplicate</i>	3/7/2016	0.12U	0.07U	0.08U	2.86	2.38	0.08U	7.07	22.47	0.564
	6/6/2016	0.12U	0.07U	0.08U	3.16	3.02	0.08U	7.13	22.46	0.581
	6/6/2016	0.12U	0.07U	0.08U	3.34	3.03	0.08U	7.13	22.46	0.581
	9/6/2016	NA	0.07U	NA	3.14	2.02	0.08U	6.97	28.89	0.556
	12/5/2016	NA	0.07U	NA	6.59	3.02	0.08U	7.05	25.21	0.586
OFR-3-A2	3/7/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
	9/6/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	NA	NA	NA
OW-BARNOWL	9/8/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.88	22.15	0.631
OW-HH2	9/8/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.86	22.48	0.661
RFR-10 <i>Duplicate</i>	3/7/2016	0.12U	0.18F	0.08U	13.85	7.4	0.08U	7.13	22.62	0.622
	3/7/2016	0.12U	0.07U	0.08U	13.33	6.76	0.08U	7.13	22.62	0.622
	4/4/2016	0.12U	0.17F	0.08U	11.89	6.73	0.08U	NA	NA	NA
	5/3/2016	0.12U	0.07U	0.08U	6.53	4.48	0.08U	7.18	22.46	0.640
	6/6/2016	0.12U	0.07U	0.08U	7.70	4.90	0.08U	7.04	22.57	0.631
	9/6/2016	NA	0.18F	NA	6.95	4.27	0.08U	7.07	22.63	0.613
	12/5/2016	NA	0.07U	NA	7.99	3.62	0.08U	6.95	22.12	0.641
RFR-10-HKT	4/1/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
RFR-10-TKT	4/1/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
RFR-10-TANK	4/4/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
RFR-10-A1	4/4/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
RFR-10-A2 <i>Duplicate</i>	3/7/2016	0.12U	0.17F	0.08U	10.38	6.41	0.08U	NA	NA	NA
	4/4/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
	5/3/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
	9/6/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	NA	NA	NA
	9/6/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	NA	NA	NA
RFR-10-B1	4/4/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
RFR-10-B2	3/7/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
	4/4/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
	5/3/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
	9/6/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	NA	NA	NA
RFR-11	3/7/2016	0.12U	0.07U	0.08U	0.96F	1.62	0.08U	7.16	22.85	0.646
	6/6/2016	0.12U	0.07U	0.08U	0.94F	0.30F	0.08U	6.82	22.58	0.787
	9/6/2016	NA	0.07U	NA	1.49	0.47F	0.08U	6.83	22.43	0.727
	12/5/2016	NA	0.07U	NA	0.91F	1.28	0.08U	6.94	22.57	0.663
RFR-11-A2	3/7/2016	0.12U	0.07U	0.08U	0.06U	0.05U	0.08U	NA	NA	NA
	9/6/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	NA	NA	NA

Appendix F
2016 Quarterly Off-Post Groundwater Monitoring Analytical Results

Well ID	Sample Date	1,1-Dichloroethene (ug/L)	<i>cis</i> -1,2-Dichloroethene (ug/L)	<i>trans</i> -1,2-Dichloroethene (ug/L)	Tetrachloroethene (ug/L)	Trichloroethene (ug/L)	Vinyl chloride (ug/L)	pH	Temperature (°C)	Specific Conductivity (mS)
Maximum Contaminant Level (MCL)		7	70	100	5	5	2			
RFR-12	9/7/2016	NA	0.07U	NA	0.06U	0.49F	0.08U	6.91	23.12	0.590
RFR-14	9/8/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.99	26.03	0.568
<i>Duplicate</i>	9/8/2016	NA	0.07U	NA	0.06U	0.05U	0.08U	6.99	26.03	0.568

BOLD
BOLD
BOLD

All samples were analyzed by APPL, Inc.
VOC data reported in ug/L.
Abbreviations/Notes:
Duplicate Field Duplicate
TCE Trichloroethene
PCE Tetrachloroethene
DCE Dichloroethene

Data Qualifiers
U-The analyte was analyzed for, but not detected. The associated numerical value is at or below the
F-The analyte was positively identified but the associated numerical value is below the RL.

Appendix F
2016 Quarterly Off-Post Groundwater Monitoring Analytical Results

Analyte	Sample ID:		LS-7	LS-7-A2	LS-7-SHOWER TAP
	MDL	RL	Sample Date:	12/30/2016	12/30/2016
1,1,1,2-TETRACHLOROETHANE	0.09	0.5	0.09U	0.09U	0.09U
1,1,1-TCA	0.03	0.8	0.03U	0.03U	0.03U
1,1,2,2-TETRACHLOROETHANE	0.07	0.4	0.07U	0.07U	0.07U
1,1,2-TCA	0.06	1.0	0.06U	0.06U	0.06U
1,1-DCA	0.07	0.4	0.07U	0.07U	0.07U
1,1-DCE	0.12	1.2	0.12U	0.12U	0.12U
1,1-DICHLOROPROPENE	0.10	1.0	0.1U	0.1U	0.1U
1,2,3-TRICHLOROBENZENE	0.24	0.3	0.24U	0.24U	0.24U
1,2,3-TRICHLOROPROPANE	0.17	3.2	0.17U	0.17U	0.17U
1,2,4-TRICHLOROBENZENE	0.16	0.4	0.16U	0.16U	0.16U
1,2,4-TRIMETHYLBENZENE	0.04	1.3	0.04U	0.04U	0.04U
1,2-DCA	0.05	0.6	0.05U	0.05U	0.05U
1,2-DCB	0.02	0.3	0.02U	0.02U	0.02U
1,2-DIBROMO-3-CHLOROPROPANE	0.76	2.6	0.76U	0.76U	0.76U
1,2-DICHLOROPROPANE	0.06	0.4	0.06U	0.06U	0.06U
1,2-EDB	0.06	0.6	0.06U	0.06U	0.06U
1,3,5-TRIMETHYLBENZENE	0.04	0.5	0.04U	0.04U	0.04U
1,3-DCB	0.03	1.2	0.03U	0.03U	0.03U
1,3-DICHLOROPROPANE	0.05	0.4	0.05U	0.05U	0.05U
1,4-DCB	0.07	0.3	0.07U	0.07U	0.07U
1-CHLOROHEXANE	0.04	0.5	0.04U	0.04U	0.04U
2,2-DICHLOROPROPANE	0.10	3.5	0.1U	0.1U	0.1U
2-CHLOROTOLUENE	0.04	0.4	0.04U	0.04U	0.04U
4-CHLOROTOLUENE	0.04	0.6	0.04U	0.04U	0.04U
BENZENE	0.07	0.4	0.07U	0.07U	0.07U
BROMOBENZENE	0.06	0.3	0.06U	0.06U	0.06U
BROMOCHLOROMETHANE	0.11	0.4	0.11U	0.11U	0.11U
BROMODICHLOROMETHANE	0.06	0.8	0.06U	0.06U	0.06U
BROMOFORM	0.13	1.2	0.13U	0.13U	0.13U
BROMOMETHANE	0.08	1.1	0.08U	0.08U	0.08U
CARBON TETRACHLORIDE	0.06	2.1	0.06U	0.06U	0.06U
CHLOROENZENE	0.04	0.4	0.04U	0.04U	0.04U
CHLOROETHANE	0.07	1.0	0.07U	0.07U	0.07U
CHLOROFORM	0.06	0.3	0.06U	0.06U	0.06U
CHLOROMETHANE	0.16	1.3	0.16U	0.16U	0.16U
CIS-1,2-DCE	0.07	1.2	0.07U	0.07U	0.07U
CIS-1,3-DICHLOROPROPENE	0.03	1.0	0.03U	0.03U	0.03U
DIBROMOCHLOROMETHANE	0.06	0.5	0.06U	0.06U	0.06U
DIBROMOMETHANE	0.06	2.4	0.06U	0.06U	0.06U
DICHLORODIFLUOROMETHANE	0.11	1.0	0.11U	0.11U	0.11U
ETHYLBENZENE	0.05	0.6	0.05U	0.05U	0.05U
HEXACHLOROBUTADIENE	0.17	1.1	0.17U	0.17U	0.17U
ISOPROPYLBENZENE	0.04	0.5	0.04U	0.04U	0.04U
M&P-XYLENE	0.07	0.5	0.07U	0.07U	0.07U
METHYLENE CHLORIDE	0.35	1.0	0.35U	0.35U	0.35U
N-BUTYLBENZENE	0.17	1.1	0.17U	0.17U	0.17U
N-PROPYLBENZENE	0.03	0.4	0.03U	0.03U	0.03U
NAPHTHALENE	0.07	0.4	0.07U	0.07U	0.07U
O-XYLENE	0.06	1.1	0.06U	0.06U	0.06U
P-ISOPROPYLTOLUENE	0.05	1.2	0.05U	0.05U	0.05U
SEC-BUTYLBENZENE	0.05	1.3	0.05U	0.05U	0.05U
STYRENE	0.08	0.4	0.08U	0.08U	0.08U
TCE	0.05	1.0	0.24F	0.05U	0.05U
TERT-BUTYLBENZENE	0.04	1.4	0.04U	0.04U	0.04U
TETRACHLOROETHENE	0.06	1.4	0.97F	0.06U	0.06U
TOLUENE	0.06	1.1	0.06U	0.06U	0.06U
TRANS-1,2-DCE	0.08	0.6	0.08U	0.08U	0.08U
TRANS-1,3-DICHLOROPROPENE	0.04	1.0	0.04U	0.04U	0.04U
TRICHLOROFLUOROMETHANE	0.07	0.8	0.07U	0.07U	0.07U
VINYL CHLORIDE	0.08	1.1	0.08U	0.08U	0.08U

BOLD ≥ MDL
BOLD ≥ RL
BOLD ≥ MCL

APPENDIX G

PRE- AND POST-GAC SAMPLE COMPARISONS FOR WELLS LS-5, LS-6, LS-7, OFR-3, RFR-10, AND RFR-11

APPENDIX G

**PRE- AND POST-GAC SAMPLE COMPARISONS FOR
WELLS LS-5, LS-6, LS-7, RFR-10, RFR-11, AND OFR-3**

LS-5					LS-6				
	PCE (µg/L)		TCE (µg/L)			PCE (µg/L)		TCE (µg/L)	
Date	Pre	Post	Pre	Post	Date	Pre	Post	Pre	Post
3/7/2016	1.12F	ND	2.50	ND	3/7/2016	0.76F	ND	1.47	ND
6/6/2016	0.88F	NA	1.79	NA	6/6/2016	0.72F	NA	0.89F	NA
9/6/2016	0.75F	ND	1.85	ND	9/6/2016	0.88F	ND	ND	ND
12/5/2016	1.06F	NA	2.16	NA	12/5/2016	ND	NA	ND	NA

LS-7					RFR-10				
	PCE (µg/L)		TCE (µg/L)			PCE (µg/L)		TCE (µg/L)	
Date	Pre	Post	Pre	Post	Date	Pre	Post	Pre	Post
3/7/2016	1.63	ND	0.28F	ND	3/7/2016	13.85	10.38/ND	7.40	6.41/ND
6/6/2016	0.62F	NA	ND	NA	3/7/2016 FD	13.33	NA	6.76	NA
9/6/2016	0.57F	ND	ND	ND	4/4/16	11.89	ND/ND	6.73	ND/ND
12/5/2016	ND	NA	ND	NA	5/3/16	6.53	ND/ND	4.48	ND/ND
					6/6/2016	7.70	NA	4.90	NA
					9/6/2016	6.95	ND/ND	4.27	ND/ND
					12/5/2016	7.99	NA	3.62	NA

RFR-11					OFR-3				
	PCE (µg/L)		TCE (µg/L)			PCE (µg/L)		TCE (µg/L)	
Date	Pre	Post	Pre	Post	Date	Pre	Post	Pre	Post
3/7/2016	0.96F	ND	1.62	ND	3/7/2016	2.86	ND	2.38	ND
6/6/2016	0.94F	NA	0.30F	NA	6/6/2016	3.16	NA	3.02	NA
9/6/2016	1.49	ND	0.47	ND	6/6/16 FD	3.34	NA	3.03	NA
12/5/2016	0.91F	NA	1.28	NA	9/6/2016	3.14	ND	2.02	ND
					12/5/2016	6.59	NA	3.02	NA

NA – not applicable (post-GAC not sampled during this event) ND – indicates analyte was not detected at or above the MDL. FD – field duplicate.

APPENDIX H
DECEMBER 2016
DATA VERIFICATION REPORTS

SDG 81653
SDG 81747
SDG 81902

DATA VERIFICATION SUMMARY REPORT
for off-post samples collected from
CAMP STANLEY STORAGE ACTIVITY

BOERNE, TEXAS

Data Verification by: Tammy Chang
Parsons - Austin

INTRODUCTION

The following data verification summary report covers six groundwater samples and the associated field quality control (QC) sample collected from off-post Camp Stanley Storage Activity (CSSA) on December 5th, 2016. The samples were assigned to the following Sample Delivery Group (SDG). All samples were analyzed for volatile organic compounds (VOCs).

81653

The field QC sample associated with this SDG was one trip blank (TB) sample. No ambient blanks were collected. During the initiation of this project, it was determined that ambient blanks were not necessary due to the absence of a source at these sites.

All samples were collected by Parsons and analyzed by APPL, Inc. following the procedures outlined in the Statement of Work and CSSA QAPP, Version 1.0. Samples in this SDG were shipped to the laboratory in one cooler. Cooler was received by the laboratory at a temperature of 2.5 °C, which was within the 2-6°C range recommended by the CSSA QAPP.

EVALUATION CRITERIA

The data submitted by the laboratory has been reviewed and verified following the guidelines outlined in the CSSA QAPP, Version 1.0. Information reviewed in the data package included sample results; field and laboratory quality control samples; calibrations; case narratives; raw data; chain-of-custody (COC) forms and the sample receipt checklist. The findings presented in this report are based on the reviewed information, and whether the guidelines in the CSSA QAPP, Version 1.0, were met.

VOLATILES

General

The volatiles portion of this data package consisted of six (6) off-post groundwater samples and one (1) TB. All samples were collected on December 5, 2016 and analyzed for a reduced list of VOCs which included: *cis*-1,2-dichloroethene, tetrachloroethene, trichloroethene, and vinyl chloride.

The VOC analyses were performed using United States Environmental Protection Agency (USEPA) SW846 Method 8260B. The samples were analyzed in two analytical

batches, #214543 and #214591 under one initial calibration curve (ICAL) with the same instrument. All samples were analyzed following the procedures outlined in the CSSA QAPP and were prepared and analyzed within the holding time required by the method. All analyses were performed undiluted.

Accuracy

Accuracy was evaluated using the percent recovery (%R) obtained from the two laboratory control spike (LCS) samples and the surrogate spikes.

All LCSs and surrogate spike recoveries were within acceptance criteria.

Precision

Precision could not be evaluated due to the lack of duplicate analyses involved in this SDG.

Representativeness

Representativeness expresses the degree to which sample data accurately and precisely represents actual site conditions. Representativeness has been evaluated by:

- Comparing the COC procedures to those described in the CSSA QAPP;
- Comparing actual analytical procedures to those described in the CSSA QAPP;
- Evaluating holding times; and
- Examining laboratory blanks and trip blank for cross contamination of samples during analysis and transportation.

All samples in this data package were analyzed following the COC and the analytical procedures described in the CSSA QAPP, Version 1.0. All samples were prepared and analyzed within the holding time required by the method.

- All instrument performance check criteria were met.
- All initial calibration criteria were met for both sets of curves.
- All initial calibration verification (ICV) criteria were met. The ICV was prepared using a secondary source standard. All second source verification criteria were met.
- All continuing calibration verification (CCV) criteria were met.
- All internal standard criteria were met.

There were two method blanks associated with the VOC analyses in this SDG. Both blanks were non-detect at method detection limits for all target VOCs.

Completeness

Completeness has been evaluated in accordance with the CSSA QAPP. The number of usable results has been divided by the number of possible individual analyte results and expressed as a percentage to determine the completeness of the data set.

All VOC results for the samples in this SDG were considered usable. The completeness for this SDG is 100%, which meets the minimum acceptance criteria of 95%.

DATA VERIFICATION SUMMARY REPORT
for on-post samples collected from
CAMP STANLEY STORAGE ACTIVITY

BOERNE, TEXAS

Data Verification by: Tammy Chang
Parsons - Austin

INTRODUCTION

The following data verification summary report covers four groundwater samples and the associated field quality control (QC) samples collected from on-post of Camp Stanley Storage Activity (CSSA) on December 12 and 13, 2016. The samples were assigned to the following Sample Delivery Group (SDG). All samples were analyzed for volatile organic compounds (VOCs) and several samples were also analyzed for selected metals which include arsenic, barium, cadmium, chromium, copper, lead, zinc, and mercury.

81747

The field QC samples associated with this SDG were one trip blank (TB), one set of matrix spike/matrix spike duplicate (MS/MSD) and one field duplicate (FD). TB was analyzed for VOC only. No ambient blanks were collected. During the initiation of this project, it was determined that ambient blanks were not necessary due to the absence of a source at these sites.

All samples were collected by Parsons and analyzed by APPL, Inc. following the procedures outlined in the Statement of Work and CSSA QAPP, Version 1.0. Samples in this SDG were shipped to the laboratory in one cooler which was received by the laboratory at a temperature of 3.5°C, within the 2-6°C range recommended by the CSSA QAPP.

EVALUATION CRITERIA

The data submitted by the laboratory has been reviewed and verified following the guidelines outlined in the CSSA QAPP, Version 1.0. Information reviewed in the data package included sample results; field and laboratory quality control samples; calibrations; case narratives; raw data; chain-of-custody (COC) forms and the sample receipt checklist. The findings presented in this report are based on the reviewed information, and whether the guidelines in the CSSA QAPP, Version 1.0, were met.

VOLATILES

General

The volatiles portion of this data package consisted of four (4) on-post groundwater samples, one (1) FD sample, and one (1) TB. All samples were collected on December 12 and 13, 2016 and analyzed for a reduced list of VOCs which included: *cis*-1,2-dichloroethene, tetrachloroethene, trichloroethene, and vinyl chloride.

The VOC analyses were performed using United States Environmental Protection Agency (USEPA) SW846 Method 8260B. The samples were analyzed in one analytical batch, #214733 under one of initial calibration (ICAL). All samples were analyzed following the procedures outlined in the CSSA QAPP and were prepared and analyzed within the holding time required by the method. All analyses were performed undiluted.

Accuracy

Accuracy was evaluated using the percent recovery (%R) obtained from the laboratory control spike (LCS) sample, MS/MSD, and the surrogate spikes. CS-12 was designated as the parent sample for the MS/MSD analyses.

All LCS, MS, MSD, and surrogate spike recoveries were within acceptance criteria.

Precision

Precision was evaluated based on the relative percent difference (%RPD) of the parent and FD sample results. CS-10 sample was collected in duplicate.

None of the target VOCs were detected above the reporting limits (RLs) for the parent and FD samples, therefore, the %RPD calculation is not applicable.

All %RPDs of the MS/MSD analyses were compliant.

Representativeness

Representativeness expresses the degree to which sample data accurately and precisely represents actual site conditions. Representativeness has been evaluated by:

- Comparing the COC procedures to those described in the CSSA QAPP;
- Comparing actual analytical procedures to those described in the CSSA QAPP;
- Evaluating holding times; and
- Examining trip and laboratory blanks for cross contamination of samples during transit or analysis.

All samples in this data package were analyzed following the COC and the analytical procedures described in the CSSA QAPP, Version 1.0. All samples were prepared and analyzed within the holding time required by the method.

- All instrument performance check criteria were met.
- All initial calibration criteria were met.

- All initial calibration verification (ICV) criteria were met. The ICV was prepared using a secondary source standard. All second source verification criteria were met.
- All continuing calibration verification (CCV) criteria were met.
- All internal standard criteria were met.

There were one method blank and one TB associated with the VOC analyses in this SDG. All blanks were non-detect at method detection limits for all target VOCs.

Completeness

Completeness has been evaluated in accordance with the CSSA QAPP. The number of usable results has been divided by the number of possible individual analyte results and expressed as a percentage to determine the completeness of the data set.

All VOC results for the samples in this SDG were considered usable. The completeness for this SDG is 100%, which meets the minimum acceptance criteria of 95%.

ICP-AES METALS

General

The ICP-AES portion of this SDG consisted of six (6) on-post groundwater samples including three on-post well samples, one FD and one set of MS/MSD. All samples were collected on December 12 and 13, 2016. All samples were analyzed for arsenic, barium, cadmium, chromium, copper, lead, and zinc.

The ICP-AES metals analyses were performed using USEPA SW846 Method 6010B. All samples were analyzed following the procedures outlined in the CSSA QAPP and were prepared and analyzed within the holding time required by the method.

The samples for ICP-AES metals were digested in batch #215042. All analyses were performed undiluted.

Accuracy

Accuracy was evaluated using the percent recovery obtained from the LCS, MS and MSD. CS-12 was designated as the parent sample for the MS/MSD analyses.

All LCS, MS, and MSD recoveries were within acceptance criteria.

Precision

Precision was measured based on the %RPD of parent/FD concentrations and MS/MSD results. Sample CS-10 was collected in duplicate.

Only Barium and Zinc were detected above the reporting limits in both parent and FD samples. The %RPD for Barium is 0% and for Zinc is 10%, both within the CSSA QAPP criteria.

Representativeness

Representativeness expresses the degree to which sample data accurately and precisely represents actual site conditions. Representativeness has been evaluated by:

- Comparing the COC procedures to those described in the CSSA QAPP;
- Comparing actual analytical procedures to those described in the CSSA QAPP;
- Evaluating preservation and holding times; and
- Examining laboratory blank for cross contamination of samples during analysis.

All samples were analyzed following the COC and the analytical procedures described in the CSSA QAPP, Version 1.0, prepared and analyzed within the holding time required by the method.

- All initial calibration criteria were met.
- All second source verification criteria were met. The ICV was prepared using a secondary source.
- All CCV criteria were met.
- All interference check (ICSA/ICSAB) criteria were met.
- No dilution test was required, as per the CSSA QAPP.

One method blank and several calibration blanks were analyzed in association with the ICP-AES analyses in this SDG. All blanks were free of target metals at or above the RL.

Completeness

Completeness has been evaluated by comparing the total number of samples collected with the total number of samples with valid analytical data.

All ICP-AES metals results for the samples in this SDG were considered usable. The completeness for the ICP metals portion of this SDG is 100%, which meets the minimum acceptance criteria of 95%.

MERCURY

General

The mercury portion of this SDG consisted of six (6) on-post groundwater samples including three on-post well samples, one FD, and one set of MS/MSD. All samples were collected on December 12 and 13, 2016 and were analyzed for mercury.

The mercury analyses were performed using USEPA SW846 Method 7470A. These samples were analyzed following the procedures outlined in the CSSA QAPP, prepared and analyzed within the holding time required by the method.

The mercury samples were prepared in batch #214919. The analyses were performed undiluted.

Accuracy

Accuracy was evaluated using the %R obtained from the LCS, MS, and MSD analyses. CS-12 was designated as the parent sample for the MS/MSD analyses.

The LCS, MS, and MSD recovery were within acceptance criteria.

Precision

Precision was measured based on the %RPD of the parent and FD results and MS/MSD results. Sample CS-10 was collected in duplicate.

The %RPD calculation was not applicable since mercury was not detected in both parent and FD samples.

The %RPD of MS/MSD was compliant.

Representativeness

Representativeness expresses the degree to which sample data accurately and precisely represents actual site conditions. Representativeness has been evaluated by:

- Comparing the COC procedures to those described in the CSSA QAPP;
- Comparing actual analytical procedures to those described in the CSSA QAPP;
- Evaluating holding times; and
- Examining laboratory blanks for cross contamination of samples during analysis.

All samples were analyzed following the COC and the analytical procedures described in the CSSA QAPP, prepared and analyzed within the holding times required by the method.

- All initial calibration criteria were met.
- All second source verification criteria were met. The ICV was prepared using a secondary source.
- All calibration verification criteria were met.

There was one method blank and several calibration blanks associated with the mercury analyses in this SDG. All blanks were free of mercury at or above the RL.

Completeness

Completeness has been evaluated by comparing the total number of samples collected with the total number of samples with valid analytical data.

Mercury result for the samples in this SDG was considered usable. The completeness for the mercury portion of this SDG is 100%, which meets the minimum acceptance criteria of 90%.

DATA VERIFICATION SUMMARY REPORT

for off-post samples collected from CAMP STANLEY STORAGE ACTIVITY

BOERNE, TEXAS

Data Verification by: Tammy Chang
Parsons - Austin

INTRODUCTION

The following data verification summary report covers three groundwater samples and the associated field quality control (QC) sample collected from off-post Camp Stanley Storage Activity (CSSA) on December 29, 2016. The samples were assigned to the following Sample Delivery Group (SDG). All samples were analyzed for full list of volatile organic compounds (VOCs).

81902

The field QC sample associated with this SDG was one trip blank (TB) sample. No ambient blanks were collected. During the initiation of this project, it was determined that ambient blanks were not necessary due to the absence of a source at these sites.

All samples were collected by Parsons and analyzed by APPL, Inc. following the procedures outlined in the Statement of Work and CSSA QAPP, Version 1.0. Samples in this SDG were shipped to the laboratory in one cooler. Cooler was received by the laboratory at a temperature of 3.0 °C, which was within the 2-6°C range recommended by the CSSA QAPP.

EVALUATION CRITERIA

The data submitted by the laboratory has been reviewed and verified following the guidelines outlined in the CSSA QAPP, Version 1.0. Information reviewed in the data package included sample results; field and laboratory quality control samples; calibrations; case narratives; raw data; chain-of-custody (COC) forms and the sample receipt checklist. The findings presented in this report are based on the reviewed information, and whether the guidelines in the CSSA QAPP, Version 1.0, were met.

VOLATILES

General

The volatiles portion of this data package consisted of three (3) off-post groundwater samples and one (1) TB. All samples were collected on December 29, 2016 upon the request of well owner for LS-7 and analyzed for a full list of VOCs according to CSSA QAPP. Samples collected include TB-1, LS-7, LS-7-A2, and LS-7-SHOWER TAP.

The VOC analyses were performed using United States Environmental Protection Agency (USEPA) SW846 Method 8260B. The samples were analyzed in one analytical

batch, #215286 under one initial calibration curve (ICAL) with the same instrument. All samples were analyzed following the procedures outlined in the CSSA QAPP and were prepared and analyzed within the holding time required by the method. All analyses were performed undiluted.

Accuracy

Accuracy was evaluated using the percent recovery (%R) obtained from the laboratory control spike (LCS) sample and the surrogate spikes.

All LCSs and surrogate spike recoveries were within acceptance criteria.

There are five VOCs with tighter control limits than what listed in the CSSA QAPP. There is no impact to the data quality caused by lab improved performance.

Precision

Precision could not be evaluated due to the lack of duplicate analyses involved in this SDG.

Representativeness

Representativeness expresses the degree to which sample data accurately and precisely represents actual site conditions. Representativeness has been evaluated by:

- Comparing the COC procedures to those described in the CSSA QAPP;
- Comparing actual analytical procedures to those described in the CSSA QAPP;
- Comparing list of VOCs and associated reporting limits to those listed in the CSSA QAPP for the water matrix;
- Evaluating holding times; and
- Examining laboratory blanks and trip blank for cross contamination of samples during analysis and transportation.

All samples in this data package were analyzed following the COC and the analytical procedures described in the CSSA QAPP, Version 1.0. All samples were prepared and analyzed within the holding time required by the method.

- All instrument performance check criteria were met.
- All initial calibration criteria were met for both sets of curves.
- All initial calibration verification (ICV) criteria were met. The ICV was prepared using a secondary source standard. All second source verification criteria were met.
- All continuing calibration verification (CCV) criteria were met.
- All internal standard criteria were met.

There was one method blank associated with the VOC analyses in this SDG. Both method blank and trip blank were non-detect at method detection limits for all VOCs.

The only two detected compounds in the LS-7 sample are TCE and PCT. Parsons data validator review the instrument print-out and confirmed the positive hit. The concentrations were between the reporting limit and method detection limit for both compounds. “F” flags were applied according to the CSSA QAPP.

Completeness

Completeness has been evaluated in accordance with the CSSA QAPP. The number of usable results has been divided by the number of possible individual analyte results and expressed as a percentage to determine the completeness of the data set.

All VOC results for the samples in this SDG were considered usable. The completeness for this SDG is 100%, which meets the minimum acceptance criteria of 95%.

APPENDIX I

LTMO AND DQO REGULATOR APPROVAL CORRESPONDENCE

March 22, 2011

April 22, 2016

April 29, 2016

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 22, 2011

Camp Stanley Storage Activity
ATTN: Mr. Gabriel Moreno-Fergusson
25800 Ralph Fair Road
Boerne, TX 78015-4800

Re: Approval – “Three-Tiered Long Term Monitoring Network Optimization Evaluation and Data Quality Objectives for the Groundwater Monitoring Program”, dated November 23, 2011
Camp Stanley Storage Activity (CSSA), Boerne, TX
TCEQ Solid Waste Registration (SWR) No. 69026
RN 100662840; CN 602728206; EPA ID No. TX2210020739

Dear Mr. Moreno-Fergusson:

The Texas Commission on Environmental Quality (TCEQ) has completed the review of the above mentioned report. In accordance with the final Resource Conservation and Recovery Act (RCRA) Section 3008(h) Administrative Order on Consent (Order) for CSSA, the Environmental Protection Agency (EPA) approved the entitled report on February 16, 2011, along with the recommendations. Based on the information provided, the TCEQ approves the LTMO evaluation recommendations and data quality objectives (DQOs).

Questions concerning this letter should be directed to my attention at 512.239.2572 or via email at kcoulter@tceq.state.tx.us. Thank you for your continued cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Coulter".

Kirk Coulter, P.G., Project Manager
Corrective Action Team 1, VCP-CA Section
Remediation Division

KEC/jdm

cc: Mr. Greg Lyssy, U.S. EPA Region 6, 1445 Ross Ave (6SF-LT), Dallas, TX 75202-2733
Ms. Julie Burdey, Parsons Inc., 8000 Centre Park Drive, Suite 200, Austin, TX 78754
Mr. Joel Anderson, Waste Program Manager, TCEQ Region 13 Office, San Antonio, TX



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Transmitted via email

April 29, 2016

Mr. Jason D. Shirley
Installation Manager
Camp Stanley Storage Activity
25800 Ralph Fair Road
Boerne, TX 78015-4800

RE: *RCRA Three Tiered Long Term Monitoring Network Optimization Evaluation*
Camp Stanley Storage Activity, Boerne, Texas

Dear Mr. Shirley:

The Three Tiered Long Term Monitoring Network Optimization (LTMO) Evaluation, dated January 11, 2016, for Camp Stanley Storage Activity (CSSA), has been reviewed by the U.S. EPA (EPA) in accordance with the final Resource Conservation and Recovery Act (RCRA) § 3008(h) Administrative Order on Consent for CSSA, (Order) Docket No. RCRA-VI 002(h)99-H FY99, dated May 5, 1999.

The purpose of the LTMO Evaluation is to ensure that the groundwater monitoring program adequately addresses the monitoring requirements of the remedial actions at the Site, both temporally and spatially. CSSA has been collecting groundwater data since 1991, and has optimized the monitoring program several times to ensure that an adequate monitoring program is in place. The proposed sampling schedule in the LTMO Evaluation meets the temporal and spatial objectives of the CSSA groundwater monitoring program and is hereby approved.

If you have any questions, please feel to contact me at 214-665-8317 or via e-mail at lyssy.gregory@epa.gov.

Sincerely,

Greg J. Lyssy

Greg J. Lyssy
Senior Project Manager
RCRA Corrective Action Section (6MM-RC)

cc: Felicia Kraintz, CSSA
Amanda Pirani, TCEQ
Jorge Salazar, TCEQ
Laurie King, EPA
Julie Burdey, Parsons



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 22, 2016

Mr. Jason Shirley
Installation Manager
Camp Stanley Storage Activity
25800 Ralph Fair Road
Boerne, TX 78015

Re: Approval

- *Three-Tiered Long Term Monitoring Network Optimization Evaluation*, dated January 11, 2016
- *Data Quality Objectives - Groundwater Monitoring Program*, dated February 2, 2016
- *Synopsis of Metals Detections in Camp Stanley Groundwater – Compendium Document to the 2015 Data Quality Objectives and Long-Term Monitoring Optimization Documents*, dated January 28, 2016

Camp Stanley Storage Activity, Boerne, Texas
TCEQ SWR No. 69026, CN602728206, RN100662840
EPA ID No. TX2210020739

Dear Mr. Shirley:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced submittals. The reports were submitted in accordance with the final Resource Conservation and Recovery Act (RCRA) §3008(h) Administrative Order on Consent (Order) for Camp Stanley Storage Activity, dated May 5, 1999. The reports provide adequate documentation and rationale to support the recommendations and revisions contained therein. The TCEQ approves the Three-Tiered Long Term Monitoring Network Optimization Evaluation, Data Quality Objectives (DQOs) – Groundwater Monitoring, and Synopsis of Metals Detections in Camp Stanley Groundwater as submitted with the following comment:

- The groundwater monitoring DQOs were revised such that the volatile organic compound (VOC) list was reduced from six compounds to four [dropping 1,1-dichloroethene (1-1-DCE) and *trans*-1,2-dichloroethene (*trans*-1,2-DCE) while retaining tetrachloroethene, trichloroethene, and *cis*-1,2-dichloroethene (*cis*-1,2-DCE)]. If future groundwater analytical results document significant increases in *cis*-1,2-DCE, the TCEQ requests that CSSA consider evaluating whether 1,1-DCE and *trans*-1,2-DCE should again be added to VOC analyte list.

Mr. Jason Shirley
Page 2
April 22, 2016
SWR No. 69026

Questions concerning this letter should be directed to me at (512) 239-6526. Thank you for your continued cooperation.

Sincerely,



Amanda Pirani, P.G., Project Manager
Team 1, VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

AP/mdh

cc: Ms. Felicia Kraintz, Environmental Program Manager, Camp Stanley Storage Activity (PDF)
Mr. Greg Lyssy, Senior Project Manager, U.S. EPA, Region 6 (PDF)
Ms. Julie Burdey, P.G., Parsons (PDF)
Mr. Jorge Salazar, Federal Facilities Coordinator, TCEQ Region 13 Office (PDF)
Mr. Cameron Lopez, Waste Program Manager, TCEQ Region 13 Office (PDF)

APPENDIX J

USEPA CONSTITUENT CONCENTRATION MAPS LETTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 Ross Avenue, Suite 1200

Dallas, Texas 75202-2733

Transmitted via e-mail

February 13, 2012

MEMORANDUM

FROM: *Greg J. Lyssy*
Senior Project Manager
Federal Facilities Section (6PD-F)

TO: Gabriel Moreno-Ferguson
CSSA

CC: Kirk Coulter
TCEQ

RE: **CSSA Constituent Concentration Maps**

This Memo is written pursuant to our meeting on January 24, 2012, and as a follow-up to the discussions on the graphical depiction of analytical data in groundwater plume maps, and in accordance with the final Resource Conservation and Recovery Act (RCRA), Section 3008(h) Administrative Order on Consent (Order) for Camp Stanley Storage Activity (CSSA), Docket No. RCRA-VI 002(h)99-H FY99, dated May 5, 1999.

Historically, CSSA has created groundwater plume delineation maps utilizing all analytical data, including historical data points as well as data points that are near or at the method detection limit of the constituents. Preparing plume maps utilizing data points that are in the part per trillion range (and several orders of magnitude below the Maximum Contaminant Levels (MCLs)) may create a misleading graphical representation of the actual plume size.

In order to have consistency on plume maps across different facilities, it is my recommendation that CSSA create a groundwater plume map at the MCL (or appropriate regulatory level if there is not an MCL) for the constituents of concern (COCs). In addition, CSSA should also create a groundwater plume map that depicts isoconcentrations at 20% of the MCL.

If desired, CSSA may create a base groundwater plume map using data near the method detection limit, but that map must contain qualifying information on the data that was used to create the map.

Groundwater monitoring of the plume at CSSA is required, and will continue to be required, as long as the Order is in place and there are COCs in the groundwater.

If CSSA, or your technical consultants, have any questions regarding this Memo, please do not hesitate to call me at 214.665.8317, or I may be contacted via e-mail at lyssy.gregory@epa.gov.