

LONGHORN ARMY AMMUNITION PLANT KARNACK, TEXAS

ADMINISTRATIVE RECORD

Volume 11 of 19

2010

Bate Stamp Numbers

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Prepared for

**Department of the Army
Longhorn Army Ammunition Plant**

1976 – 2010

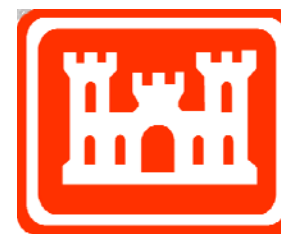
***LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS
ADMINISTRATIVE RECORD – CHRONOLOGICAL INDEX***

VOLUME 11 of 19

2010

- A. Title: Report – (Continued) Final Feasibility Study, LHAAP-29, Former TNT
 Production Area, Group 2, Longhorn Army Ammunition Plant, Karnack,
 Texas, April 2010
 Author(s): US Army Corps of Engineers
 Recipient: USEPA
 Date: April 30, 2010
 Bate Stamp: 00091097 – 00091772

FINAL
FEASIBILITY STUDY
LHAAP-29, FORMER TNT PRODUCTION AREA, GROUP 2
LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS



APRIL 2010



Date: April 30, 2010

Project No.: 117591

TRANSMITTAL LETTER:

To: Mr. Aaron Williams

Address: US Army Corps of Engineers - Tulsa

CESWT-PP-M

1645 South 101st East Ave

Tulsa, Oklahoma 74128

Re: Final Feasibility Study, LHAAP-29

Contract No. W912QR-04-D-0027/DS02

For: Review ☐ As Requested ☐ Approval ☐ Corrections ☐ Submittal ☐ Other ☒ X

<i>Item No:</i>	<i>No. of Copies</i>	<i>Date:</i>	<i>Document Title</i>
1	2	April 2010	Final Feasibility Study, LHAAP-29, Former TNT Production Area, Group 2, Longhorn Army Ammunition Plant, Karnack, Texas

Aaron– Enclosed are two copies of Shaw’s final version of the above-named document. Copies have been distributed as indicated below.

Please call with any questions or comments.

Sincerely:

Praveen Srivastav
Project Manager

CC: Distribution List:

Mr. J. Lambert– USACE, Tulsa (sent to A. Williams for distribution)

Mr. M. Mechenes – USAEC

Ms. Rose Zeiler – BRAC-LHAAP

Mr. S. Tzhone – EPA Region 6 (2)

Ms. F. Duke– TCEQ, Austin (2)

Mr. D. Vodak– TCEQ, Tyler

Mr. P. Bruckwicki– U.S. Fish and Wildlife Service



DEPARTMENT OF THE ARMY
LONGHORN ARMY AMMUNITION PLANT
POST OFFICE BOX 220
RATCLIFF, AR 72951

00091099

April 30, 2010

DAIM-ODB-LO

Ms. Fay Duke (MC-136)
SSDAT/Superfund Section
Remediation Division
Texas Commission on Environmental Quality
12100 Park 35 Circle, Bldg D
Austin, TX 78753

Re: Final Feasibility Study, LHAAP-29, Former TNT Production Area, Group 2,
Longhorn Army Ammunition Plant, Karnack, Texas, April 2010
SUP 126

Dear Ms. Duke,

The above-referenced document is being transmitted to you for your files. The document has been prepared by Shaw Environmental, Inc. (Shaw) on behalf of the Army as part of Shaw's performance based contract for the facility.

The point of contact for this action is the undersigned. I ask that Praveen Srivastav, Shaw's Project Manager be copied on any communications related to the project. I may be contacted at 479-635-0110, or by email at rose.zeiler@us.army.mil.

Sincerely,

Rose M. Zeiler, Ph.D.
Longhorn AAP Site Manager

Copies furnished:

S. Tzhone, USEPA Region 6, Dallas, TX
D. Vodak, TCEQ, Tyler, TX
P. Bruckwicki, Caddo Lake NWR, TX
J. Lambert, USACE, Tulsa District, OK
M. Mechenes, USAEC, MD
A. Williams, USACE, Tulsa District, OK
P. Srivastav, Shaw, Houston, TX (for project files)



DEPARTMENT OF THE ARMY
LONGHORN ARMY AMMUNITION PLANT
POST OFFICE BOX 220
RATCLIFF, AR 72951

00091100

April 30, 2010

DAIM-ODB-LO

Mr. Stephen Tzhone
US Environmental Protection Agency
Superfund Division (6SF-AT)
1445 Ross Avenue
Dallas, TX 75202-2733

Re: Final Feasibility Study, LHAAP-29, Former TNT Production Area, Group 2,
Longhorn Army Ammunition Plant, Karnack, Texas, April 2010

Dear Mr. Tzhone,

The above-referenced document is being transmitted to you for your files. The document has been prepared by Shaw Environmental, Inc. (Shaw) on behalf of the Army as part of Shaw's performance based contract for the facility.

The point of contact for this action is the undersigned. I ask that Praveen Srivastav, Shaw's Project Manager, be copied on any communications related to the project. I may be contacted at 479-635-0110, or by email at rose.zeiler@us.army.mil.

Sincerely,

A handwritten signature in black ink, reading "Rose M. Zeiler", is positioned above the typed name.

Rose M. Zeiler, Ph.D.
Longhorn AAP Site Manager

Copies furnished:

F. Duke, TCEQ, Austin, TX
D. Vodak, TCEQ, Tyler, TX
P. Bruckwicki, Caddo Lake NWR, TX
J. Lambert, USACE, Tulsa District, OK
A. Williams, USACE, Tulsa District, OK
M. Mechenes, USAEC, MD
P. Srivastav, Shaw – Houston, TX (for project files)

From: Tzhone.Stephen@epamail.epa.gov [mailto:Tzhone.Stephen@epamail.epa.gov]
Sent: Friday, April 30, 2010 9:01 AM
To: Zeiler, Rose Ms CIV USA OSA
Cc: Srivastav, Praveen; Jones, Greg N; Lambert, John R SWT; Everett, Kay; Watson, Susan; Fay Duke; Burton.Terry@epamail.epa.gov; Forsythe.Barry@epamail.epa.gov; Williams, Aaron K SWT
Subject: Longhorn: EPA Review of LHAAP-29 DF FS Track Changes and RTC Table for Review

Hi Rose:

The EPA has completed review of the Army *LHAAP-29 DF FS Track Changes and RTC Table for Review* (email 4/29/2010) and agrees with the submittal. Please proceed with finalization of the LHAAP-29 Feasibility Study.

Thanks,

Stephen L. Tzhone
Superfund Remedial Project Manager
USEPA Region 6 (6SF-RA)
214.665.8409
tzhone.stephen@epa.gov

From: Fay Duke [mailto:FDUKE@tceq.state.tx.us]
Sent: Thursday, April 29, 2010 3:04 PM
To: Srivastav, Praveen; Tzhone, Stephen
Cc: Everett, Kay; Jones, Greg N; Lambert, John R SWT; Watson, Susan; Williams, Aaron; Zeiler, Rose Ms CIV USA OSA
Subject: Re: FW: LHAAP-29 DF FS Track Changes and RTC Table for Review

Rose/Praveen,

The TCEQ has completed its review of the Track Changes of the Draft Final Feasibility Study. We concur with the changes with one exception. However, it is our opinion that the issuance of the final FS need not be held up. The exception was due to TCEQ review oversight by not providing the comment regarding the shallow groundwater cleanup level for perchlorate at site LHAAP-29. As we have expressed in previous FS reports and proposed plans, because the groundwater at site LHAAP-29 has a potential to discharge to surface water, the residential MSC for groundwater must be the cleanup level for the shallow groundwater. We believe that this can be made clear in the proposed plan and finalize in the ROD and therefore, the final FS report need not be revised.

Please let me know if you should have any questions regarding this matter.

Thanks, fd

Fay Duke (MC-136)
Remediation Division, TCEQ
PO Box 13087
Austin, Texas 78711-3087
512-239-2443
512-239-2450 (Fax)

Comments on Draft Final Feasibility Study (published March 2009)
LHAAP-29, Former TNT Production Area, Group 2
Longhorn Army Ammunition Plant, Karnack, Texas

Reviewers: USEPA, TCEQ, US Army, plus additional changes since April 2009 Meeting
Respondents: Praveen Srivastav, Project Manager; Susan Watson, Shaw Environmental, Inc.

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Reviewer: Stephen L. Tzhone, Superfund Remedial Project Manager, USEPA Region 6 (6SF-RA), U.S. Environmental Protection Agency Specific Comments											
1	2-6	Section 2.3.2	The explanation for chromium from well casings is much improved over previous discussions and is acceptable to EPA.	C	Noted.	A					
2	2-6	Section 2.3.2	However, it is unclear to EPA how positive sample detections for nickel, mercury, and arsenic above MCLs can be discarded. For EPA, the arguments given are not convincing, please revise.	C	<p>In Section 2.3.2 – Groundwater, Additional Sampling 2008 and 2009, replace the 4th, 5th and 7th paragraphs with the following:</p> <p>“Of the 80 nickel samples collected since 1993, nickel was detected above the GW-Ind of 2,000 µg/L in only 3 samples. Prior to 2008, the nickel concentration in only one well had an associated HQ greater than 1 (8,400 µg/L at 29WW11 in April 1995). The 2008 result from this well had a concentration of 40 µg/L. In 2008, the highest nickel concentration was found at 29WW07 with 3,190 µg/L and would have an HQ greater than 1.0. Previous results for 29WW07 were less than 40 µg/L in May 1995 and 600 µg/L in July 1998. Thus, high nickel concentrations in individual wells have not been repeatable or consistently detected. The isolated high nickel concentrations at 29WW07 and 29WW11 coincided with elevated chromium concentrations (i.e., above the MCL of 100 µg/L for chromium), indicating that corrosion of the stainless steel well material is a likely source of the high nickel concentrations. Since the nickel detections are isolated in each event, and appear to be related to corrosion of the stainless steel wells, nickel is not considered a COC.”</p> <p>“Of the 80 arsenic samples collected since 1993, arsenic was detected above the MCL of 10 µg/L in only 7 samples. Four of the elevated results (115, 29WW16, 29WW20, and 29WW25) were obtained in 1998 or before. It was suspected that the elevated concentrations could be a result of sampling methodology and/or turbid samples. In 2008, nineteen additional samples were collected including the two wells with the highest historic concentrations (59 µg/L at shallow well 29WW25 and</p>	D	<p>Increasing concentrations should require additional monitoring, not less. If the sample was performed incorrectly or is otherwise not representative of the subsurface, then the sample should be redone properly. Currently, it could be argued that the existing remedy is now allowing metals to be released to the environment, and thus is not protective. EPA recommends retaining nickel, arsenic, and mercury, given that their recent concentrations could also support a contention of increasing contamination. If the metals are not an issue, then future monitoring will verify that, and the sampling protocol can be revisited at a later time.</p>	<p>COCs that have been confirmed to have concentrations above MCL, MSC or risk-based standards must be retained for remedial action except in cases where samples taken recently have shown the concentrations are now below the cleanup levels. If the sample result that exceeds cleanup level is believed not to be a representative groundwater samples (i.e., turbidity), than a representative sample should be collected and re-analyzed.</p> <p>Additionally, With in-situ chemical oxidation as the potential remedy at this site, metals should be monitored to ensure metals are not mobilized as a result of the pH change.</p>	C	<p>Nickel, arsenic, and mercury will be added to the COC Table 2-5 with footnotes that they are isolated COCs limited to certain wells defined in Tables 2-2 and 2-3 and in Section 2.3.2. The following will be revised in Section 2.3.2 response:</p> <p>Nickel – last sentence will be replaced with the following: “Since the nickel detections are isolated in each event, and appear to be related to corrosion of the stainless steel wells, nickel is not considered a site-wide COC and will be considered a COC limited to shallow groundwater zone wells 29WW07 and 29WW11.”</p> <p>Arsenic – last sentence will be replaced with the following:</p> <p>“It is concluded that arsenic is not considered a site-wide COC since the arsenic detections have been sporadic, are not repeatable, and can be attributed to sampling methodology or natural occurrence in the deep zone. Thus, arsenic is an isolated COC limited to shallow groundwater zone wells 116, 29WW08, and 29WW25.”</p> <p>Mercury- last sentence will be replaced with the following:</p> <p>”Thus, mercury is not considered a site-wide COC and will be an isolated COC limited to the shallow groundwater zone Well 118.”</p> <p>In Section 2.4.2, the following will be added to the shallow water groundwater discussion, paragraph 5: “Three metals, nickel, arsenic and mercury, had sporadic detections above clean</p>	

Comments on Draft Final Feasibility Study (published March 2009)
LHAAP-29, Former TNT Production Area, Group 2
Longhorn Army Ammunition Plant, Karnack, Texas

Reviewers: **USEPA, TCEQ, US Army, plus additional changes since April 2009 Meeting**
Respondents: Praveen Srivastav, Project Manager; Susan Watson, Shaw Environmental, Inc.

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					<p>44 µg/L at intermediate well 29WW16). The wells were redeveloped prior to sampling. In 2008, only 3 samples (116, 29WW08, and 29WW25) had arsenic concentrations above the MCL. The well with the highest concentration (29WW25) had high turbidity (237.1 NTUs) and was noted to be reddish brown. This sample result is questionable due to the high turbidity. The next highest sample (116) was qualified as an estimated value since the field duplicate relative percent difference criteria was exceeded. It should also be noted that the aluminum concentration was high at 430 µg/L. This sample result is also questionable due to QC issues. The third sample from deep well 29WW08 had arsenic concentrations of 40.1 µg/L with a high aluminum concentration of 713 µg/L. The high aluminum concentrations in the same sample indicates that the arsenic may be naturally occurring. Additionally, this deep well is clustered with a shallow well, 29WW07, and intermediate well, 29WW14, neither of which has had an arsenic detection. Thus, the contamination is not from vertical migration. It is concluded that arsenic is not considered a COC since the arsenic detections have been sporadic, are not repeatable, and can be attributed to sampling methodology or natural occurrence in the deep zone.”</p> <p>“Of the 80 mercury samples collected since 1993, mercury has been detected only twice, both in shallow zone Well 118. The latest round from 2008 detected mercury at 6.1 µg/L in Well 118 – higher than the previous result of 3 µg/L in 1993. The MCL for mercury is 2 µg/L. In 1995 and 1998, mercury was not detected (less than detection limit of 0.2 µg/L) in Well 118. Mercury is not detected in any other well, and the detections are intermittent and appear to be isolated. Well 118 is located along the southern edge of the site, away from active industrial areas that are possible sources. Mercury was detected at low concentrations in</p>					<p>up goals in certain wells and do not define a plume in the groundwater. These metals have been included as COCs.”</p> <p>Additionally, the notes on Tables 2-2 and 2-3 will be revised to note that arsenic and nickel are isolated COCs in certain shallow groundwater zone wells and are not site wide.</p> <p>The list of analytes to be monitored during the remedy (including metals potentially mobilized by in situ oxidation) will be addressed in the remedial design.</p> <p>The alternatives will be revised to include groundwater monitoring for these analytes for the wells defined in Section 2.3.2.</p>	

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					three soil samples (29SB04, 29SB12 and 29SB55) and one sediment sample (29SD13), but all of these locations are more than 1,500 feet from Well 118. Sample results from wells located between the soil sample locations and Well 118 did not detect mercury. Soil and sediment samples near Well 118 (29SD08, 29SD09, 29SB71, and 29SB72) did not show any detectable mercury, so the mercury in groundwater is not related to the mercury in soil. Additionally, the Final Baseline Human Health and Screening Ecological Risk Assessment for Group 2 Sites (Jacobs, 2002) calculated a hazard index (HI) of 0.098 for mercury in groundwater using the maximum mercury value of 3 µg/L. Adjusting this HI for the new higher maximum of 6.1 µg/L gives an HI of 0.20, still less than 1.0. Thus, mercury is not considered a COC in groundwater."			April 14, 2010 E-mail from Faye Duke to Rose Zeiler: We cannot concur with the conclusion that the three metals: arsenic, mercury, and nickel are not considered site wide COC and will only be monitored in wells where these metal concentrations have exceeded the MCLs. We believe there are insufficient data to conclude that these metal contamination is limited in these wells currently and have not traveled since the last sampling event. We recommend that the monitoring locations and frequencies be assessed and determined during the remedial design after additional samples have been collected.		While we do not believe these metals are site-wide, we do agree that this can be further addressed during remedial design (RD). Therefore, the text will be modified to indicate that the extent of these inorganic COCs will be assessed at wells site-wide during the RD. Also, the RD will present a plan for subsequent monitoring locations and frequencies based on the latest assessment data in conjunction with historical groundwater monitoring results for inorganics at the site.	
3	2-9	Section 2.4.2 3 rd para	The phrase "...concentrations less that the EPC..." should replace "that" with "than".	C	Text will be revised.	A					
4			Is the kinetics curves information given in Appendix C solely used to extrapolate future kinetics and determine whether the remedy (post excavation/oxidation) is working appropriately?	C	The kinetic curves were used to extrapolate future kinetics. Future results will serve to determine whether or not the chosen remedy is working appropriately. The curves will be re-evaluated after additional MNA data are obtained.	A					
Reviewer: Stephen L. Tzhone, Superfund Remedial Project Manager, USEPA Region 6 (6SF-RA), U.S. Environmental Protection Agency General Comments											
5		General	Please modify statements such as: "MNA ensures that ground water contamination is localized" or "MNA prevents human exposures". Allowing the natural healing processes of nature to work and keeping track of that progress is not the same as "ensuring" or "preventing".	C	Page ES-3 is the only place this phrasing appears. Executive Summary, Alternative 2 bullet, MNA sentence, will be revised as follows: <i>"Implementation of MNA in both the shallow and intermediate zones would ensure that groundwater contamination concentrations and plume stability/size are monitored as</i>	A	Note: new language is acceptable.				

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Respondents: Praveen Srivastav, Project Manager; Susan Watson, Shaw Environmental, Inc.

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					<i>the plume degrades over time.”</i> Executive Summary, Alternative 3 bullet, MNA sentence, will be revised as follows: <i>“Implementation of MNA in both the shallow and intermediate zones would ensure that groundwater contamination concentrations and plume stability/size are monitored as the plume degrades over time.”</i> Section 6.3.2.3.2, last sentence of 4 th paragraph will be revised as follows: <i>“In both zones, long-term success will be verified by monitoring the progress of natural attenuation.”</i>						
Reviewer: Stephen L. Tzhone, Superfund Remedial Project Manager, USEPA Region 6 (6SF-RA), U.S. Environmental Protection Agency Comments on additional materials presented April 28-29, 2009:											
1			The screening data for anaerobic biodegradation and the geologic cross-sections are helpful and appreciated.	C	Noted.	A					
2	5-6	5.2.2.3	The criterion for ending the oxidation/extraction phase remains unclear. Are all MC expected to be remediated before the oxidation is completed, or is there a set figure which is expected to be attained?	C	Based on the treatability study (Appendix B), the MC concentrations will be reduced by approximately 75% through heat activated persulfate. MNA will be initiated after the formation has recovered from the oxidation treatment activities. Also, see 9B response.	A	Note: EPA agrees with Army that 75% reduction in Methylene Chloride concentrations for this site is sufficient to allow continued remediation by MNA.				
3		6.5	Discussed eliminating recommendation section.	C	The recommendation section will be deleted.	A					

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Reviewer: Fay Duke , Remediation Division, TCEQ Comment received on May 1, 2009 via email at 6:40 p.m., RE: TCEQ Comments on LHAAP-17 FS										
1		Table 3-3	Please note that comment No. 5 regarding action specific ARARs should also be considered a comment for LHAAP-29 FS. Comment 5 for LHAAP-17 FS - Section 3.2.4.1.2 (Waste and Disposal Activities) – It states that requirements for managing, storing and disposal will be conducted in accordance with ARAR listed in Table 3-3. However, we believe that the action specific ARARs discussion and requirements listed in Table 3-3 is incomplete. The discussion in this section is focus on the AOC concept, which applies mainly		CERCLA section 121(d) requires on-site Superfund remedial actions to comply with Federal, and more stringent State, environmental requirements that are determined to be applicable or relevant and appropriate requirements (ARARs); thus, even though requirements for off-site actions are not ARARs, they must be complied with. The following will be added to the second paragraph of Section 3.2.4.1.2: "Other requirements for hazardous waste such as manifesting for off-site disposal (40 CFR 262.20) and planning/implementing off-site	D	Despite recent clarifications from EPA, we believe that action specific ARARs table is still incomplete. 1. With in-situ chemical oxidation as one of the alternative, why is federal and state requirements for UIC not listed as a potential ARARs? 2. Please explain the rational for deleting Table 3-2, which addresses the location-specific ARARs?	C	The UIC is not listed as a potential action specific ARAR since it is only an administrative requirement. The other requirements for drilling the wells are already included in the action specific ARARs. Since Longhorn is a CERCLA site, a permit for a Class V injection well would not be required. The Army and USEPA are currently discussing the location-specific ARARs. For purposes of moving forward with the FS, the location-specific ARARs will	

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			to on-site disposal. Please note the waste management and disposal requirements under RCRA are usually “appropriate and relevant” requirements for on-site disposal but these requirements are typically “applicable” for off-site disposal. Additionally, certain requirements such as procedures for planning and implementing off-site response action (40 CFR 300.440) are applicable to CERCLA response action waste. Please revise.		response action (40 CFR 300.440) will be complied with even though they are not considered an ARAR." Additionally - the ARAR discussion will be revised to address only environmental laws, and the potential location-specific Table 3-2 will be deleted; and the USEPA MCLs/TCEQ MSCs will be used for groundwater cleanup and the Texas Safe Drinking Water Act will be removed from the chemical-specific ARAR discussion.		April 14, 2010 E-mail from Faye Duke to Rose Zeiler: We concur that CERCLA permit exemption means that administrative requirements are exempt. We disagreed with your statement that TAC chapter 331 contains only administrative requirements. We believe that at a minimum, TAC chapter 331 Subchapter H must be included as action specific ARARs. Please also keep in mind that to ensure that the design meets the substantive requirements, the review and evaluation is deferred to the staff from the TCEQ UIC program for the review of the design documents. Please let me know if you should have any questions or concerns regarding these comments. If the final LHAAP-29 FS incorporates these changes, please proceed with the issuance of the final FS.		be retained as “potential” ARARs. Based on the outcome of these discussions, the appropriate ARARs will be included in the ROD. Text in Section 3.2.4 and Table 3-3 will be modified to indicate that substantive requirements of TAC Chapter 331 Subchapter H that are relevant and appropriate to installation of the injection points will be included as potential action-specific ARARs.	
Comments from the April 2009 meeting										
			From the meeting minutes: <i>On the 2nd day of the meeting, the log of deep well 29WW40 was examined, specifically with regard to PID readings versus depth. Reading dropped noticeably after the intermediate zone, but the group agreed that the readings are inconclusive given the method of drilling (mud rotary). F. Duke said that the TCEQ needed conclusive proof that the contamination was not in the Upper Deep zone. Shaw and Army preferred to install this well now rather than wait. P. Srivastav said it would take at least 6 weeks to install the well and get sample results. There was some discussion of the best location for the new well. It was decided that the well will be installed approximately 50 feet downgradient (northeast) of 29WW40. Data from this well will be evaluated to determine if the remedy for LHAAP-29 needs to be modified. C. Sanchez asked about the earlier TCEQ concern about the shallow zone, but F. Duke said that was not a problem since trends within the zone would be tracked.</i> The new well (29WW41) was installed, and a follow-up email was sent on July 2, 2009. The email contained the well location, boring log, groundwater sampling form, and lab results. This information relating to 29WW40 will be incorporated into the Feasibility Study as follows in Comments 1A through 6A:							
1A		Table 1-1			The following bullet will be added under Additional Investigations: <ul style="list-style-type: none">Installed new well, 29WW41, in the Upper Deep Zone and sampled the well for VOCs (Appendix D).					

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2A		1.3			New next-to-last paragraph will be added as follows: “In June 2009, one new monitoring well (29WW41) was installed and sampled for VOCs to determine whether groundwater in the upper deep zone immediately below the highest MC concentration in the intermediate zone (at 29WW16) showed any evidence of contamination. Well 29WW41 was screened at a depth of 102.5 to 117.5 feet bgs. A groundwater sample was collected for VOC analysis.”		The text should include the rationale for sampling only VOCs.	C	The following sentence will be added: “This deeper well was installed to evaluate the potential downward migration of contaminants in the intermediate zone. Only VOCs have been identified as COCs in the intermediate zone, and thus the sample was analyzed for VOCs.”	
3A		2.3.2			<p>The following will be added as a new 11th paragraph (before the paragraph beginning with “Tables 2-2 and 2-3) . . .”:</p> <p>“A sample was collected from the newly installed well, 29WW41, in the upper deep zone and analyzed for VOCs, which were not detected in the sample. Therefore, groundwater in the upper deep zone is not affected by VOCs.”</p> <p>The second sentence of the 12th paragraph will be revised as follows: “Appendix D contains the table of the results and analytical data reports from the October 2008, January 2009, and June 2009 sampling events.”</p>					
4A		2.4.3			A new last paragraph will be added as follows: “As demonstrated by previous sample results and sampling of new monitoring well 29WW41 in June 2009, the deep groundwater zone is not affected at LHAAP-29.”					
5A		Figures 1-6, 1-7, 2-2, 2-3, and 2-4			29WW41 will be added as a deep well.					
6A		Appendix D			The title of Appendix D will be revised as follows: “Summary Table, Field Sheets, Well Log (29WW41), and Analytical Data Reports (October 2008, January 2009, and June 2009)”					
The following are in response to additional comments from the Army on May 27, 2009										
1B			Your response for LHAAP-29 that concentrations above MSCs in the cooling and waste lines will be immobilized by plugging the lines does not address Army’s concern for the eventual leaching of the contamination via vertical percolation after the pipes have degraded. Shaw’s response is also inconsistent with the response provided to Carlos Sanchez at the on-board review meeting to address Carlos’s similar concern in leaving the contamination in the lines. The high concentrations in the lines need to be properly addressed.	C	Even though the plugging of the waste lines was discussed during the April 27-28, 2009 meeting, the proposed remedial action has been modified depending upon the type of the line and its history, as discussed below. A further review of historical information revealed that the wooden line was clear flushed, and the RCRA Facility Assessment recommended no further action for the wooden line. Investigations noted that the line was in poor condition, but analytical results for soil samples collected near the line did not indicate any contamination from the wooden pipeline. Thus, no further action will be proposed for the deteriorated wooden line.		TCEQ has a few questions and concerns regarding the new approach. 1. Were confirmation samples taken after the “clear flush?” What method was utilized to visually inspect the inside of the line? 2. We are concern that the decision making for the wooden line is depending upon the RFA. I spoke to my colleague in the RCRA program regarding the RFA and RFI process. It is my understanding that the RFA process is solely based on visual inspection. It is very typical that additional sample collection or a full-blown RFI is required even if the RFA recommends no		1. Unknown. 2. Soil samples were collected and results indicated that explosive levels in the soil did not exceed either the SAI-ind or the GWP-Ind. See revised Table 2-5. 3. There is only one transite pipe at the site and it is buried underground for the most part, except near the former pump location. As part of the remedial design, the line will be surveyed for deed recordation purposes and all exposed areas will be buried with at least 2 feet of soil. 4. The site-specific MSC and SAM modelling will be	

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					<p>Some points within the transite line have been reported to contain a thick viscous semi-solid residue in the bottom. Material from within the line was tested by Shaw and exceeds both the GWP-Ind and SAI-Ind. The transite lines will be flushed with water to remove the residue. The rinsate water will be containerized, transported and treated at the on-site wastewater treatment plant or disposed of at an off-site facility based on analytical results for explosives.</p> <p>In the manholes of the gravity feed portion of the cooling water lines, explosives were detected in the solid residue and water at concentrations above the GWP-Ind and the GW-Ind, respectively. SAM modeling was conducted to estimate the potential impact of the solid residue remaining in the manholes to the groundwater if the line degraded in the future. The SAM modeling indicated that there would not be an impact from the solid residue in the manholes. The manholes should be low spots in the lines where solid residue would collect and minimal solid residue is expected to be found in the actual lines between the manholes. To determine if there is contaminated solid residue in the lines, field staff will attempt to collect solid residue samples during the remedial action from within the lines between the manholes with GWP-Ind exceedances. Where there is sufficient residue for such samples to be collected, they will be analyzed to determine if the residue is above the proposed cleanup levels (calculated site-specific medium-specific concentration [MSC] by SAM modeling). If there is no measurable amount of solid residue in the lines, no action will be taken. If there is a measurable amount of solid residue in the lines, but explosives are detected below the GWP-Ind or site-specific MSC, no action will be taken. If solid residue concentrations are found to be above the proposed cleanup levels in the lines (GWP-Ind or site-specific MSC), the affected segment of the line between two manholes will be flushed. The rinsate water will be containerized, transported and treated at the on-site groundwater treatment plant or disposed of off-site based on the explosives concentrations. The manholes will then be plugged.</p> <p>Comments 1B through 12B indicate the revisions to be made to the FS.</p>		<p>further action. Please also note that the RFA recommendation is made based on the conditions of the line ("structurally sound and bedded securely") at the time of the inspection.</p> <p>3. Please note that transite pipes are considered a category II non-friable asbestos-containing material under the TCEQ rules, as such, must be managed so asbestos materials are not release when the pipes deteriorate. Please clarify whether these pipes are currently embedded or exposed.</p> <p>4. We are concerned and question the applicability of using a calculated site specific MSC to determine the management method for the waste residual left in the pipes. Please note that the risk reduction standard No. 3 are typically applicable only for to contaminated media (e.g., soil) and not waste. The residuals are "waste-like" and therefore the residual should be classified in accordance with TAC 335 Subchapter R and the TCEQ guideline for the classification of industrial and hazardous waste. Waste must be managed in accordance with the substantive requirements of 30 TAC Subchapter A, B, C, E, and/or F. We believe that it is appropriate to leave the residual in place only if the waste residual is classified as nonhazardous; the concentrations of constituents are below Standard No. 2 MSCs for soil and the leachate is below groundwater protection standards. However, the location of the abandon pipe must be deed recorded.</p>		<p>removed. Text and table has been revised as indicated in the track-changed text attached to these RTCs.</p> <p>Please note that the cooling water lines are made of vitrified clay pipes. There are two cooling water lines (north and south). Historically, there has been very little residue in the cooling water lines as observed in the manholes. An attempt will be made to sample and analyze the residue and water in the cooling water lines as part of the RD phase. If there is not enough residue volume to sample or the concentrations in the sample are less than the GW-Ind (water) or GWP-Ind (solid) and the residue is nonhazardous, the pipe will be plugged and abandoned. No solid residue or liquid will be left in the pipe if the explosive constituents exceed the GWP-Ind (residue), the GW-Ind (water) or the solid or liquid is determined to be hazardous (residue or water). If explosive concentrations are above the GWP-Ind (residue) or GW-Ind (water) or the material is found to be hazardous, the line will be flushed before plugging and abandoning. The rinsate will be characterized for waste handling..</p> <p>The FS cost estimates will be revised. The estimates will be based on the assumption that the north cooling water line and the transite wastewater line will be flushed before abandoning.</p>	
2B		1.2.3.1			<p>Section 1.2.3.1 – Operation Summary, 3rd paragraph, the second sentence will be replaced with the following:</p> <p>"The underground lines consisted of TNT wastewater (red liquor) lines and the cooling water (blue water) lines (Figure 1-3). The red liquor TNT</p>		<p>It is stated that the "transite pipe was in good condition when it was unearthed in 1993..." What is the current condition of the pipe? Is the pipe exposed?</p>		<p>It is assumed to still be in good condition. Please see response to Comment 1B above.</p>	

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					<p>wastewater line, originally SWMU LHAAP-30 and later included as part of IRP/DSERTS LHAAP-29, was originally installed as a wooden pipeline. The Addendum to the Phase 2 Work Plan noted that the transite waste line was added 5 feet north of the wooden line based on a modified drawing dated March 30, 1943 (Bate Stamp 12651). The transite material is a combination of cement and asbestos. The TNT red water line was clear-flushed in 1946 (Bate Stamp 001446, RCRA Facility Assessment, April 1988). The transite pipeline was in good condition when it was unearthed in 1993 at a location approximately 400 feet northwest of the pond and at the three locations sampled along the line as part of the Shaw additional investigation in 2006.“</p> <p>5th paragraph will be replaced with following: “Two blue cooling water lines exist at LHAAP-29, north and south (Figure 1-3), and range from 8 inches to 18 inches in diameter. These gravity fed lines are thought to be constructed of vitrified clay pipe with asbestos wicking. These lines collected water from each TNT washing area. Manholes exist along both the north and south cooling water lines. The northern line is connected to lines from each plant (approximately 280 feet of 10-inch-diameter pipe). The lines drain into a ditch along 16th street which eventually flows into Goose Prairie Creek.</p>					
3B		2.3.3			Section 2.3.3, Process Lines, text will be replaced in its entirety and is attached.					
4B		2.4.1			<p>The last paragraph of Section 2.4.1 will be deleted and a new section 2.4.3, Process Lines, will be added as follows:</p> <p>“Contaminated explosives residue remains within the transite TNT wastewater line at concentrations above the SAI-Ind and GWP-Ind, but access to the pipe is limited to the inlets and outlets unless the pipe is penetrated. Additionally, the line is deeper than the cleanup depth of 2 feet bgs for nonresidential use. The gravity flow portion of the line is approximately 3,000 linear feet. The pressurized portion of the line is approximately 1,000 linear feet. The line is in good condition.</p> <p>The wooden TNT wastewater line was flushed and abandoned. The results from soil samples collected near the line indicate there has not been a release to the surrounding soil. Further, the line is deeper than the near-surface soil depth of 2 feet bgs considered for nonresidential use (TAC335.559(g)). Furthermore, it was noted in site documentation that</p>		See comments above.			

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					no additional action is necessary for the wooden TNT wastewater line (Bate Stamp 001446). The north and south cooling water lines are accessible through manholes, and the liquid and solid residue contents from the manholes were sampled. The liquid and solid residues from the manholes are contaminated with explosives at concentrations that are above the GW-Ind (liquid) and the GWP-Ind (solid residue). There are approximately 5,000 feet of pipe in the main lines, approximately 1,680 linear feet of pipe from each production area to the main line, and 12 manholes.”																									
5B		3.1			Section 3.1, RAOs, 1 st bullet will be replaced with the following: “Protect the hypothetical future maintenance worker by preventing exposure to the contaminants in the soil, sediment, transite TNT wastewater line, cooling water lines, and groundwater.”																									
6B		3.3/ 3.3.3			Section 3.3, second sentence will be replaced with the following: “The cleanup levels for soil, groundwater, and solid residue in the cooling water lines at LHAAP-29 are determined with consideration of the risk to human health, the risk to ecological receptors, and the ARARs identified for the site in Section 3.2.2.” Add New Section 3.3.3 Cooling Water Lines “The cleanup levels for solid residue in the cooling water lines at LHAAP-29 are the site-specific MSCs calculated using the SAM model (Appendix E). Solid residue in the cooling water lines exceeded the site-specific MSC for 2,4-DNT in manholes 8 and 10. If similar thicknesses and concentrations of solid residue exist in the adjacent pipelines, then 2,4-DNT could potentially leach into groundwater at unacceptable concentrations if the pipe deteriorates. Table 3-6 summarizes the COCs and the proposed cleanup levels for solid residue in the lines using the site-specific MSCs .” Table 3-6 Proposed Cleanup Levels for Target COCs in Cooling Water Lines <table><tr><th>Explosive</th><th>Site-Specific MSC (mg/kg)</th></tr><tr><td>2,4,6-Trinitrotoluene</td><td>250</td></tr><tr><td>2,4-Dinitrotoluene</td><td>0.38</td></tr><tr><td>2,6-Dinitrotoluene</td><td>0.31</td></tr><tr><td>2-amino-4,6-Dinitrotoluene</td><td>160</td></tr></table>	Explosive	Site-Specific MSC (mg/kg)	2,4,6-Trinitrotoluene	250	2,4-Dinitrotoluene	0.38	2,6-Dinitrotoluene	0.31	2-amino-4,6-Dinitrotoluene	160		See comments regarding cleanup levels and waste classifications.		Revised response to reflect Comment1B. Add New Section 3.3.3 Cooling Water Lines “The cleanup levels for solid residue in the cooling water lines at LHAAP-29 are the GWP-Ind values. Solid residue in the cooling water lines exceeded the GWP-Ind for 2,4-DNT in manholes 8 and 10. If similar thicknesses and concentrations of solid residue exist in the adjacent pipelines, then 2,4-DNT could potentially leach into groundwater at unacceptable concentrations if the pipe deteriorates. Table 3-6 summarizes the COCs and the proposed cleanup levels for solid residue in the lines using the GWP-Ind values.” Table 3-6 Proposed Cleanup Levels for Target COCs in Cooling Water Lines <table><tr><th>Explosive</th><th>GWP-Ind (mg/kg)</th></tr><tr><td>2,4,6-Trinitrotoluene</td><td>5.1</td></tr><tr><td>2,4-Dinitrotoluene</td><td>0.042</td></tr><tr><td>2,6-Dinitrotoluene</td><td>0.042</td></tr><tr><td>2-amino-4,6-Dinitrotoluene</td><td>1.7</td></tr></table>	Explosive	GWP-Ind (mg/kg)	2,4,6-Trinitrotoluene	5.1	2,4-Dinitrotoluene	0.042	2,6-Dinitrotoluene	0.042	2-amino-4,6-Dinitrotoluene	1.7	
Explosive	Site-Specific MSC (mg/kg)																													
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					<table><tr><td>4-amino-2,6-Dinitrotoluene</td><td>100</td></tr></table> <p>Abbreviations: mg/kg milligrams per kilogram MSC medium-specific concentration</p>	4-amino-2,6-Dinitrotoluene	100				<table><tr><td>4-amino-2,6-Dinitrotoluene</td><td>1.7</td></tr></table> <p>Abbreviations: GWP-Ind Soil MSC for industrial use based on groundwater protection mg/kg milligrams per kilogram MSC medium-specific concentration</p>	4-amino-2,6-Dinitrotoluene	1.7	
4-amino-2,6-Dinitrotoluene	100													
4-amino-2,6-Dinitrotoluene	1.7													
7B		4.4.1.3.1			Section 4.4.1.3.1, under Plug and Abandon Lines, “migration of sediment and residue” will be revised to “migration of solid residue”									
8B		5.1.2			Section 5.1.2, 1st sentence, will be revised as follows: “...sediment in the outfall ditch, and solid residue in the cooling water lines and manholes.”									
9B		5.2.2.2 and 5.2.3.2			Sections 5.2.2.2 and 5.2.3.2, will be revised as follows: “The transite TNT wastewater line will be flushed with water to remove visual residue. The rinsate water will be containerized, transported and treated at the on-site wastewater treatment plant or disposed of off-site based on the explosive chemical concentrations. The inlets and outlets of the transite TNT wastewater line will be plugged with a bentonite slurry mix or equivalent. The cooling water lines showed no significant contamination except for 2,4-DNT in the solid residue in manholes 8 and 10. The cooling water lines will be inspected to determine if there is contaminated solid residue in the lines adjacent to manholes 8 and 10. An attempt will be made to collect samples from the solid residue within the lines adjacent to manholes 8 and 10, and samples will be analyzed to determine if 2,4-DNT concentrations in solid residue in the pipes is above the proposed cleanup level (site-specific MSC). If there is no measurable amount of residue in the lines, no action will be taken. If there is measurable amount of residue in the lines a sample will collected. If concentrations are below the site specific MSC, no action will be taken. If solid residue concentrations are found to be above the proposed cleanup level in the lines (site-specific MSC), the affected segment of the line will be flushed, the rinsate water will be containerized, transported and treated at the on-site wastewater treatment plant. The manholes will then be plugged with a bentonite slurry mix or equivalent.”		Please note that method of handling the rinsate water would depend on the classification of the waste residue. <							

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					oxidation treatment activities.”					
11B		Figures, Tables, and Appendix Lists			<p>Due to adding Tables 2-4 through 2-7, existing Tables 2-4 and 2-5 become Tables 2-8 and 2-9. Table 3-6 is added.</p> <p>Due to adding Figure 2-5, existing Figures 2-5 and 2-6 become Figures 2-6 and 2-7.</p> <p>Original Appendix E in the Draft Final will be changed to Appendix F.</p>				Original Appendix E in the Draft final will remain as Appendix E. The SAM modeling appendix attached to the RTCs will be removed.	
12B		In general			<p>Figure 2-5 is attached.</p> <p>Appendix E, Soil Attenuation Model, is attached.</p> <p>Table 1-1, Additional Investigations, 5th bullet will be revised as follows:</p> <p>“Collected 8 solid residue samples from manholes...”</p> <p>And 8th bullet will be revised as follows:</p> <p>“...29SD49, 3 solid residue samples from the transite...”</p> <p>For clarity of meaning, the words “cleanup goals” will be changed to “cleanup levels” in the document. This occurs five times – on pages 3-4, 5-3, 5-6, 6-11, and 6-19.</p> <p>SAM Soil Attenuation Model will be added to the acronyms.</p> <p>Appendix A – references in text, tables and figures to “sediment samples” collected in the lines will be revised to “solid residue” samples.</p> <p>Section 1.1, Appendix E description will be added.</p> <p>“Deed recordation” language will be updated to “recordation notification with the county” in the following sections:</p> <ul style="list-style-type: none">• Section 3, Table 3-3, Land Use Controls when Hazardous Substances are Left in Place• Section 3.2.4.1.3, 2nd paragraph, 2nd sentence• Section 4.4.1.2.1, Covenants, 1st sentence, next to last sentence of Administrative Controls bullet.• Section 4.4.2.2.1, Covenants, 1st sentence, last		See comments above regarding the proposed cleanup levels.		See response to above comment concerning Appendix E.	

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					sentence of effectiveness bullet, next to last sentence of Administrative Controls bullet.					
13B		General FS consistency changes			<p>The language in the LHAAP-29 FS will be revised to be consistent with the recent finalized FSs (LHAAP-46, LHAAP 50, and LHAAP-35A(58)), which include the following:</p> <p>The remedial action objectives will be revised as follows:</p> <p>“The Army recognizes USEPA’s policy to return all groundwater to potential beneficial uses, based on the non-binding programmatic expectation in the NCP. The RAOs for LHAAP-29, which address contamination associated with the media at the site and take into account the future uses of LHAAP streams, land, and groundwater are:</p> <ul style="list-style-type: none">• Protect the hypothetical future maintenance worker by preventing exposure to the contaminants in the soil, sediment, transite TNT wastewater line, cooling water lines, and groundwater.• Prevent migration of contaminants to groundwater and surface water from potential sources in the soil, sediment and process lines (TNT wastewater and cooling water)• Protect ecological receptors by preventing exposure to the contaminated soil and sediment• Return groundwater to its potential beneficial uses, wherever practicable, within a reasonable time period given the particular site circumstances.” <p>Other changes include the following:</p> <ul style="list-style-type: none">• Throughout document, when discussing potential beneficial use of groundwater, “restore” will be revised to “return”.• MNA sampling frequency will be revised to reflect the most recent schedule (i.e. two years of quarterly sampling, etc.).• Future maintenance worker will be changed to hypothetical future maintenance worker throughout the document.					

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Section 2.3.3, Process Lines

At LHAAP-29 there are red liquor TNT wastewater lines (transite and wooden) and blue cooling water lines with manholes (north and south). It should be noted that the explosives sample results from Phase I and Phase II (29WL01 through 29WL11) were deemed unusable for environmental decision making per USEPA (Jacobs, 2002). Additional investigations were conducted for both lines since the risk assessment (**Appendices A and B**).

2.3.3.1 TNT Wastewater Lines

During the Phase I Remedial Investigation, the transite TNT wastewater line was found at 29WL04 and 32WL02 but was not found near 29WL01, 29WL02, and 29WL03. This investigation also noted that the wood stave line was found to be soft and severely weathered. Soil samples (29SB81 through 29SB85) were collected in 2004 along the wastewater line near the wash house sumps to check for contamination possibly leaking from the wooden wastewater line into the surrounding soil (**Appendix A**). In 2006, the transite line was found approximately 5-feet north of the wooden line location and sampled near original locations 29WL01 (2006 sample ID 20WL14), 29WL02 (2006 sample ID 29WL13), and 32WL02 (2006 sample ID 32WL05) (**Appendix B**).

The risk assessment contained soil EPC values for 2,4,6-TNT (190 mg/kg), 2-amino-4,6-DNT (25 mg/kg), and 4-amino-2,6-DNT (16 mg/kg). The other explosives were not detected. In 2006, the sample results for 2,4,6-TNT at 29WL13 was above the EPC. The results of the other two explosives were below their EPCs. For evaluation of the additional data collected in 2004 and 2006, the results were compared to SAI-Ind and GWP-Ind values. There were several explosives detected in the transite wastewater line that were above the GWP-Ind. Table 2-4 summarizes the solid residue sample results from within the TNT transite wastewater line that are above the GWP-Ind. Only two explosives (2,4,6-TNT and 2,4-DNT) had concentrations above the SAI-Ind in the solid residue from within the pipe. The explosive sample results above the SAI-Ind in the solid residue from within the transite pipe are shaded in **Table 2-5**. The sample locations are shown on **Figure 2-5**.

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**Table 2-5
Summary of Solid Residue Sample Results from Transite TNT Wastewater Line**

Explosive	EPC from Risk Assessment (mg/kg)	SAI-Ind (mg/kg)	GWP-Ind (mg/kg)	Concentration* (mg/kg)	Sample location
2,4,6 TNT	190 (associated HI of 0.77)	510	5.1	526 58.4 17 JL	29WL13 29WL14 32WL05
2,4 DNT	--	4.2	0.042	5.15 JL 89 7.21	32WL05 29WL13 29WL14
2-amino-4,6-DNT	25 (associated HI of 0.33)	170	1.7	19 JH	29WL14
4-amino-2,6-DNT	16 (associated HI of 0.21)	170	1.7	13.3	29WL14
1,3-DNB	--	100	1	1.08	29WL13

Notes and Abbreviations:

* Concentrations included in table are above the GWP-Ind. Shaded concentrations are also above the SAI-Ind.

DNB	dinitrobenzene
DNT	dinitrotoluene
EPC	exposure point concentration
GWP-Ind	soil MSC for industrial use based on groundwater protection
HI	hazard index
JL	concentration is estimated and biased low
JH	concentration is estimated and biased high
mg/kg	milligrams per kilogram
MSC	medium-specific concentration
SAI-Ind	soil MSC for industrial use based on inhalation, ingestion and dermal contact
TNT	trinitrotoluene

Samples of soil (29SB81 – 29SB85) were collected near the wooden TNT wastewater line in 2004 and were analyzed for explosives (**Appendix A**). **Table 2-6** lists the detected explosive concentrations in the samples from the soil near the TNT wooden wastewater line. The concentrations were all below their associated EPC. These concentrations were also compared to both the SAI-Ind and GWP-Ind, and no exceedances were found in the soil near the wooden TNT wastewater line. The sample locations are shown on **Figure 2-5**.

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**Table 2-6
Explosive Compounds Detected in Soil Samples near Wooden TNT Wastewater Line**

Explosive	EPC from Risk Assessment (mg/kg)	SAI-Ind (mg/kg)	GWP-Ind (mg/kg)	Concentration (mg/kg)	Sample Location	Associated Depth
2,4,6-TNT	190 (associated HI of 0.77)	510	5.1	0.43	29SB83	4-5 ft bgs
2-amino-4,6-DNT	25 (associated HI of 0.33)	170	1.7	0.23 J 0.9	29SB85 29SB85	4-5 ft bgs 8-9 ft bgs
4-amino-2,6-DNT	16 (associated HI of 0.21)	170	1.7	0.30 J	29SB85	8-9 ft bgs

Abbreviations:

DNT	dinitrotoluene
EPC	exposure point concentration
ft bgs	feet below ground surface
GWP-Ind	soil MSC for industrial use based on groundwater protection
HI	hazard index
J	concentration is estimated
mg/kg	milligrams per kilogram
MSC	medium-specific concentration
SAI-Ind	soil MSC for industrial use based on inhalation, ingestion and dermal contact
TNT	trinitrotoluene

2.3.3.2 Cooling Water Lines

LHAAP-29 was constructed with two vitrified clay cooling lines as shown on **Figure 2-5**, referred to as the north and south cooling water lines. These lines are accessible through manholes. Liquid and solid residue from these manholes were sampled in 2004 (**Appendix A**). 1,3,5-TNB; 2,4,6-TNT; 2,4-DNT; 2,6-DNT; 2-amino-4,6-DNT; and 4-amino-2,6-DNT were detected. None of the detected explosives were above the EPCs in the risk assessment. The detected results were also compared to the GWP-Ind. Several explosives were detected above the GWP-Ind in both the north and south cooling lines. The detected concentration of 1,3,5-TNB (0.440 mg/kg) at MH02 was less than the GWP-Ind of 310 mg/kg and is not shown on **Table 2-7**.

Comments on Draft Final Feasibility Study (published March 2009)
LHAAP-29, Former TNT Production Area, Group 2
Longhorn Army Ammunition Plant, Karnack, Texas

00091117

Reviewers: **USEPA, TCEQ, US Army, plus additional changes since April 2009 Meeting**
Respondents: Praveen Srivastav, Project Manager; Susan Watson, Shaw Environmental, Inc.

1. Respondent Concur (C), Does Not Concur (D), Takes Exception (E), or Delete (X).
2. Commentor Agrees (A) with response, or Does not Agree (D) with response.

Table 2-7
Summary of Solid Residue Sample Results from Cooling Water Lines

Explosive	EPC from Risk Assessment (mg/kg)	GWP-Ind (mg/kg)	Concentration* (mg/kg)	Sample location	Associated line
2,4,6-TNT	190 (associated HI of 0.77)	5.1	11 7 5.5	MH02 MH10 MH08	S Cooling N Cooling N Cooling
2,4-DNT	--	0.042	0.71 1.1	MH08 MH10	N Cooling N Cooling
2,6-DNT	--	0.042	0.24 J 0.30 J	MH10 MH08	N Cooling N Cooling
2-amino-4,6-DNT	25 (associated HI of 0.33)	1.7	3.8 J 2.4 J 9	MH02 MH09 MH10	S Cooling N Cooling N Cooling
4-amino-2,6-DNT	16 (associated HI of 0.21)	1.7	2.6 J 2.5 J 7.8	MH02 MH09 MH10	S Cooling N Cooling N Cooling

Notes and Abbreviations:

* Concentrations included in table are above the GWP-Ind.

DNT dinitrotoluene
EPC exposure point concentration
GWP-Ind soil MSC for industrial use based on groundwater protection
HI hazard index
J concentration is estimated
mg/kg milligrams per kilogram
MSC medium-specific concentration
TNT trinitrotoluene

Liquid samples were also collected from the cooling water line manholes. The detected explosives in the water in the manholes of both the north and south lines included 1,3,5-TNB, 2,4,6-TNT, 2,4-DNT, 2,6-DNT, 2-amino-4,6-DNT, and 4-amino-2,6-DNT. **Table 2-8** lists the detected liquid samples that were above the GW-Ind. For MH09, there were two sets of samples collected (2004 and 2005). Though some of the results from the 2005 sampling round are lower than the GW-Ind, they have been included in **Table 2-8**. Both the north and south cooling lines have sample results that indicate the liquid within the cooling water lines are above the GW-Ind.”

**Comments on Draft Final Feasibility Study (published March 2009)
LHAAP-29, Former TNT Production Area, Group 2
Longhorn Army Ammunition Plant, Karnack, Texas**

00091118

Reviewers: **USEPA, TCEQ, US Army, plus additional changes since April 2009 Meeting**
Respondents: Praveen Srivastav, Project Manager; Susan Watson, Shaw Environmental, Inc.

1. Respondent Concurs (C), Does Not Concur (D), Takes Exception (E), or Delete (X).
2. Commentor Agrees (A) with response, or Does not Agree (D) with response.

**Table 2-8
Explosive Compounds Detected in Liquid Samples from Cooling Water Lines**

Explosive	EPC from Risk Assessment (µg/l)	GW-Ind (µg/l)	Concentration (µg/l)	Sample location	Associated line
2,4,6-TNT	--	51	250 84.3 JL 430 5200 20	MH01 MH05 MH06 MH09 (12/04) MH09 (2/05)	South South South North North
2,4-DNT	530 (HI=2.6)	0.42	15 0.8 J 1.13 1.05 0.922 J 0.934 J	MH01 MH09 (12/04) MH09 (2/05) MH10 MH11 MH12	South North North North North North
2,6-DNT	530 (HI=5.2)	0.42	4.1 27 1.27 1.35 1.15 1.31	MH01 MH09 (12/04) MH09 (2/05) MH10 MH11 MH12	South North North North North North
2-amino-4,6-DNT	5.9 (HI=0.35)	17	220 1.68	MH09 (12/04) MH09 (2/05)	North North
4-amino-2,6-DNT	5.9 (HI=0.35)	17	33 290 2.42	MH01 MH09 (12/04) MH09 (2/05)	South North North

Abbreviations:

DNT dinitrotoluene
EPC exposure point concentration
GW-Ind groundwater MSC for industrial use
HI hazard index
J concentration is estimated
JL concentration is estimated and biased low
MSC medium-specific concentration
TNB trinitrobenzene
TNT trinitrotoluene

FINAL
FEASIBILITY STUDY
LHAAP-29, FORMER TNT PRODUCTION AREA, GROUP 2
LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS



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Acronyms and Abbreviations

°C	degrees Celsius
°F	degrees Fahrenheit
µg/L	micrograms per liter
AOC	area of contamination
AR	Administrative Record
ARARs	applicable or relevant and appropriate requirements
AST	aboveground storage tank
BERA	baseline ecological risk assessment
bgs	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CFR	Code of Federal Regulations
CLI	Caddo Lake Institute
COCs	contaminants of concern
COPECs	contaminants of potential ecological concern
CWA	Clean Water Act of 1972
cy	cubic yards
DCA	dichloroethane
DNAPL	dense non-aqueous phase liquid
DNT	dinitrotoluene
EcoPRG	ecological preliminary remediation goal
EEQ	ecological effects quotient
ELCR	excess lifetime cancer risk
EPC	exposure point concentration
ESA	environmental site assessment
FFA	Federal Facility Agreement
FR	Federal Register
FS	Feasibility Study
g/L	grams per liter
GAC	granulated activated carbon
GRAs	general response actions
GW-Ind	groundwater MSC for industrial use
GWP-Ind	soil MSC for industrial use based on groundwater protection
HI	hazard index
HMX	octahydro-1,3,5,7-tetranitro-1,3,5,7-tetrazocine
HQ	hazard quotient

Acronyms and Abbreviations (continued)

IRP/DSERTS	Installation Restoration Program/Defense Site Environmental Restoration Tracking System
LHAAP	Longhorn Army Ammunition Plant
LOAEL	lowest-observed adverse effect level
LUCs	land use controls
MARC	Multiple Award Remediation Contract
MC	methylene chloride
MCLs	maximum contaminant levels
mg/kg	milligrams per kilogram
MNA	monitored natural attenuation
MSC	Medium-Specific Concentration
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NOAEL	no-observed adverse effect level
NPL	National Priorities List
O&M	operation and maintenance
OSHA	Occupational Safety and Health Administration
pH	hydrogen ion concentration
PP	Proposed Plan
PPE	personal protective equipment
PVC	polyvinyl chloride
RAOs	remedial action objectives
RCRA	Resource Conservation and Recovery Act
RDX	hexahydro-1,3,5-trinitro-1,3,5-triazine
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
SAI-Ind	soil MSC for industrial use based on inhalation, ingestion and dermal contact
Shaw	Shaw Environmental, Inc.
STEP	Solutions to Environmental Problems, LLC
SVOC	semivolatile organic compound
SWMU	solid waste management unit
TAC	Texas Administrative Code
TBC	to-be-considered
TCDD	tetrachlorodibenzo-p-dioxin
TCE	trichloroethene
TCEQ	Texas Commission on Environmental Quality
TNB	trinitrobenzene

Acronyms and Abbreviations (continued)

TNT	trinitrotoluene
TRV	toxicity reference value
TSD	treatment, storage, and disposal
USACE	U.S. Army Corps of Engineers
U.S. Army	U.S. Department of the Army
USC	United States Code
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Services
VOC	volatile organic compound
ZVM	zero-valence metals

Executive Summary

This Feasibility Study (FS) was prepared by Shaw Environmental, Inc. (Shaw), for the U.S. Army Corps of Engineers (USACE), Tulsa District, under the Louisville District's Multiple Award Remediation Contract (MARC) No. W912QR-04-D-0027, for remediation activities on the former Longhorn Army Ammunition Plant (LHAAP) in Karnack, Texas. This FS presents the analysis of remediation alternatives for the Former Trinitrotoluene (TNT) Production Area, designated as LHAAP-29, in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), and provides for the remedy selection consistent with the intended use of LHAAP as a national wildlife refuge.

LHAAP is an inactive, government-owned, formerly contractor-operated and maintained Department of Defense facility located in central-east Texas. LHAAP-29 is a heavily wooded, 85-acre site in the western-central portion of the LHAAP installation. The site is currently inactive, but once contained five active and one standby TNT production lines. The area still contains the foundations for the former production facilities and the underground pipe lines that were originally built for cooling water drainage and TNT wastewater conveyance.

The entire installation was under the control of the U.S. Department of the Army (U.S. Army) until May 5, 2004, when approximately two thirds of the property was transferred to the U.S. Department of Interior's Fish and Wildlife Service (USFWS). The U.S. Army Environmental Command provides funding for the environmental remedial activities. The Base Realignment and Closure Division is responsible for all aspects of LHAAP including the environmental programs, operations, and land transfer.

Surface runoff from the northern part of the site (about 40 percent of the site area) enters Goose Prairie Creek located approximately 1,500 feet to the north and east of the site. In the southern portion of the site (about 60 percent of the site), surface runoff flows into a tributary of Central Creek located near the southeast portion of the site. Via these two creeks, the runoff from LHAAP-29 eventually enters Caddo Lake.

There are three groundwater zones at LHAAP-29: shallow, intermediate and deep. The bottom of each of the zones is defined by a continuous or semi-continuous clay layer of varying thickness. The predominant flow of both the shallow and intermediate groundwater zones is to the east/northeast.

Sampling specific to LHAAP-29 media was conducted during several investigations prior to and after the human health risk assessment (Jacobs, 2002). The baseline human health risk

assessment (Jacobs, 2002) indicates a hazard for the hypothetical future maintenance worker with a hazard index of 1 from soil and 3,000 from groundwater. There is no unacceptable cancer risk to the hypothetical future maintenance worker from soil at LHAAP-29, but the cancer risk from groundwater is 1.3×10^{-4} , which is outside the United States Environmental Protection Agency (USEPA) target risk range of 1×10^{-6} to 1×10^{-4} for the excess lifetime cancer risk.

Additional investigations were conducted after the risk assessment was completed. The additional data do not change the overall outcome of the risk assessment, but did change some of the contaminants of concern (COCs). Although COCs have been detected in the shallow and intermediate groundwater zones beneath LHAAP-29, the horizontal extent of contamination is not widespread and appears to be isolated to a few specific areas at the site. The COCs identified for soil are 2,4,6-TNT, 2,4-dinitrotoluene (DNT), and perchlorate. The COCs identified for the shallow groundwater zone are 1,2-dichloroethane (DCA), trichloroethene (TCE), 2,4-DNT, 2,6-DNT, 2-nitrotoluene, 3-nitrotoluene, 4-nitrotoluene, and perchlorate. The COCs in the intermediate zone are methylene chloride (MC), 1,2-DCA, and TCE.

An ecological conceptual exposure model was developed for various “sub-areas” throughout the LHAAP as part of the *Final Facility-Wide Baseline Ecological Risk Assessment* (BERA) (Shaw, 2007b). Ecological hazards were found to be acceptable for the Industrial Sub-Area that includes LHAAP-29; however, elevated concentrations of nitrotoluenes (TNT, 2,4-DNT and 2,6-DNT) were identified at one location at the site. Further data determined that analysis identified the nitrotoluenes at this one location and the adjacent area possibly represent a small area of highly elevated concentrations (i.e., a hot spot) that could pose a threat to small-range ecological receptors (Shaw, 2007b). Therefore, nitrotoluenes are considered as contaminants of potential ecological concern (COPECs) for the soil at LHAAP-29.

Explosive compound releases resulting from the manufacturing process of TNT, releases from process tanks and process pipelines, are the suspected contamination sources at LHAAP-29. From 1959 to the mid 1970's, “soak-out” of out-of-specification motors was conducted at the site using MC, and these operations along with the MC storage tank could have all had releases. Potential sources of contamination at the site are co-located wood and transite TNT wastewater pipelines, cooling water lines and manholes, explosives compounds in stained soils around the foundation of Buildings 806-A and -D, isolated perchlorate-containing soils in the northeastern portion of LHAAP-29, and TNT-contaminated sediment in the cooling water outfall ditch.

The U.S. Army recognizes USEPA's policy to return all groundwater to potential beneficial uses, based on the non-binding programmatic expectation in the National Contingency Plan. The remedial action objectives (RAOs) for LHAAP-29, which address contamination associated with the media at the site and take into account the future uses of LHAAP streams, land, and groundwater are:

- Protect the hypothetical future maintenance worker by preventing exposure to the contaminants in the soil, sediment, transite TNT wastewater line, cooling water lines, and groundwater.
- Prevent migration of contaminants to groundwater and surface water from potential sources in the soil, sediment and process lines (TNT wastewater and cooling water).
- Protect ecological receptors by preventing exposure to the contaminated soil and sediment.
- Return groundwater to its potential beneficial uses, wherever practicable, within a reasonable time period given the particular site circumstances.

The FS identifies and screens remedial technologies and associated process options that may be appropriate for satisfying the RAOs for LHAAP-29 with respect to effectiveness, implementability and cost. Select remedial technologies and process options were carried forward after the initial screening and were combined to develop the following remedial alternatives for LHAAP-29:

- **Alternative 1 – No action.** Leaves the contaminated soil, groundwater, waste water lines in place with no remedial action or additional measures to prevent exposure to the COCs or their migration, and serves as a baseline for comparison with the other alternatives. The ‘No action’ alternative is an evaluation requirement under CERCLA.
- **Alternative 2 – Excavation and off-site disposal for soil; plug waste lines; in situ chemical oxidation, Monitored Natural Attenuation (MNA) and Land Use Controls (LUCs) for intermediate zone groundwater, and MNA and LUCs for shallow zone groundwater.** Alternative 2 excavates the contaminated soil from LHAAP-29 and addresses the former TNT wastewater and cooling water lines by plugging and abandoning the lines and manholes. This alternative reduces contamination in the intermediate groundwater zone by in situ chemical oxidation with simultaneous extraction. Implementation of MNA in both the shallow and intermediate zones would ensure that groundwater contamination concentrations and plume stability/size are monitored as the plume degrades over time. Groundwater monitoring would continue until cleanup levels are met. LUCs will restrict use of groundwater until it is returned to beneficial use.
- **Alternative 3 – Excavation and off-site disposal for soil; plug lines; intermediate zone groundwater extraction, MNA and LUCs for groundwater.** As with Alternative 2, contaminated soil is removed, the lines and manholes are plugged and abandoned. Groundwater contamination is reduced in the intermediate zone via groundwater extraction, treatment at the existing LHAAP groundwater treatment plant, and discharge into surface water in accordance with plant permit. Implementation of MNA in both the shallow and intermediate zones would ensure that groundwater contamination concentrations and plume stability/size are monitored as the plume degrades over time. Similar to Alternative 2, LUCs will be maintained until groundwater is returned to beneficial use.

Each of the alternatives was evaluated against CERCLA criteria to provide a basis for selecting a preferred alternative to be published in Proposed Plan and Record of Decision documents.

Table ES-1 summarizes the comparative analysis of the alternatives presented in this study.

Table ES-1
Comparative Analysis of Alternatives

Criteria	Alternative 1 No Action	Alternative 2 Excavation and off-site disposal for soil; plug lines; in situ chemical oxidation, MNA and LUCs for intermediate zone groundwater; and MNA and LUCs for shallow zone groundwater	Alternative 3 Excavation and off-site disposal for soil; plug lines; groundwater extraction, MNA and LUCs for groundwater
Overall protection of human health and the environment	No protection. Does not achieve RAOs.	Achieves RAOs. Protection of human health and environment provided by soil removal and remediation of groundwater COCs to cleanup levels	Achieves RAOs. Protection of human health and environment provided by soil removal and remediation of groundwater COCs to cleanup levels.
Compliance with ARARs	No compliance with chemical-specific ARARs.	Complies with all ARARs.	Complies with all ARARs.
Long-term effectiveness and permanence	Is not effective at protection of human health and the environment and does not provide permanence.	In situ chem-ox for intermediate zone should be effective and permanent; however, uncertainty exists concerning the effectiveness of in situ treatment for reducing groundwater contaminant concentrations to cleanup levels. Treatability and pilot studies would be required to further assess the effectiveness of this treatment method and a pre-design would be required to determine the optimum extraction technique configuration. Evaluation of natural attenuation suggests that contaminants are degrading naturally. MNA sampling will be conducted to confirm its effectiveness. Land use controls would be effective and reliable so long as they are maintained. Excavation of soil is effective long-term and permanent as contamination would be removed from the site and placed in a permitted landfill.	Should be effective and permanent for intermediate zone via extraction and treatment, based on the efficiency exhibited by the current groundwater treatment system. A pre-design study would be required to determine the optimum extraction technique/configuration. Evaluation of natural attenuation suggests that contaminants are degrading naturally. MNA sampling will be conducted to confirm its effectiveness. Land use controls would be effective and reliable so long as they are maintained. Excavation of soil is effective long-term and permanent as contamination would be removed from the site and placed in a permitted landfill.
Reduction of toxicity, mobility, or volume through treatment	No reduction.	Provides permanent and irreversible reduction of intermediate zone. Provides active reduction of toxicity and volume of groundwater contaminants through biological degradation component of MNA.	Extraction and treatment of contaminated groundwater intermediate zone reduces toxicity, mobility, and volume of groundwater contaminants in this area outside of natural processes. Provides active reduction of toxicity and volume of groundwater contaminants through biological degradation component of MNA.

Table ES-1 (continued)
Comparative Analysis of Alternatives

Criteria	Alternative 1 No Action	Alternative 2 Excavation and off-site disposal for soil; plug lines; in situ chemical oxidation, MNA and LUCs for intermediate zone groundwater; and MNA and LUCs for shallow zone groundwater	Alternative 3 Excavation and off-site disposal for soil; plug lines; groundwater extraction, MNA and LUCs for groundwater
Short-term effectiveness	No short-term impacts.	Greater potential for impacts to the community or hypothetical future maintenance worker through off-site transportation of contaminated soil. Release to environment can be controlled during construction.	Greater potential for impacts to the community or hypothetical future maintenance worker through off-site transportation of contaminated soil. Release to environment can be controlled during construction.
Implementability	Inherently implementable.	Implementable, but uncertainty exists whether in situ chemical oxidation would lower contaminant concentrations to cleanup levels. Specialized knowledge required for implementation. Use of on-site storage tanks may limit storage capacity. A groundwater treatment system is already operating at LHAAP.	Implementable. Use of on-site storage tanks may limit storage capacity. A groundwater treatment system is already operating at LHAAP. Potential exists for limited groundwater recovery which may affect ability of system to remove contaminants to cleanup levels. A pre-design study would be required.
Cost* (present worth)			
Capital	\$0	\$2,109,000	\$1,360,000
O&M	\$0	\$919,000	\$1,558,000
Total	\$0	\$3,028,000	\$2,918,000
State Acceptance	This criterion will be evaluated in the Proposed Plan after state agency comments are provided.		
Community Acceptance	This criterion will be evaluated in the Proposed Plan after community comments are provided.		

Notes and Abbreviations:

* Costs have been rounded to nearest \$1,000.

ARAR applicable or relevant and appropriate requirement

COC contaminant of concern

LHAAP Longhorn Army Ammunition Plant

LUC land use controls

MNA monitored natural attenuation

O&M operation and maintenance

RAO remedial action objective

1.0 Introduction

This Feasibility Study (FS) was prepared by Shaw Environmental, Inc. (Shaw), for the U.S. Army Corps of Engineers (USACE), Tulsa District, under the Louisville District's Multiple Award Remediation Contract (MARC) No. W912QR-04-D-0027, for remediation activities at the former Longhorn Army Ammunition Plant (LHAAP) in Karnack, Texas. This FS presents an analysis of remediation alternatives for the Former Trinitrotoluene (TNT) Production Area, designated as LHAAP-29, in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).

The U.S. Army Environmental Command provides funding for the environmental remedial activities at LHAAP. The Base Realignment and Closure Division is responsible for all aspects of LHAAP including the environmental program, operations, and land transfer.

1.1 Purpose and Organization of Report

Under CERCLA, environmental cleanup decision-making follows a prescribed sequence: Remedial Investigation (RI), FS, Proposed Plan (PP), and Record of Decision (ROD). The RI serves as the mechanism for collecting data to characterize site conditions, determining the nature and extent of the contamination, and assessing risks to human health and the environment from this contamination. The investigatory element of decision making for LHAAP-29 has been completed and documented in an RI report (Jacobs, 2001) and a baseline risk assessment report (Jacobs, 2002).

The FS takes the next step of identifying and evaluating remedial solutions to the environmental problems identified for LHAAP-29. This step begins with the formulation of viable alternatives, which involves defining remedial action objectives (RAOs), general response actions (GRAs), volumes or area of media to be addressed, and potentially applicable technologies and process options. After a reasonable number of appropriate alternatives have been formulated, the alternatives undergo a detailed analysis using nine established evaluation criteria. The detailed analysis evaluates individual alternatives against the criteria and compares them with each other to gauge their relative performance. Each alternative that makes it to this stage of the analysis, with the exception of the required "No Action" alternative, is expected to be protective of human health and compliant with applicable or relevant and appropriate requirements (ARARs) (unless a waiver is justified), both threshold requirements under CERCLA. The alternatives developed in this FS address the media and contaminants of concern (COCs) at LHAAP-29 through combinations of source control and groundwater actions.

The main text of this FS is composed of the following sections:

- **Section 2**, “Risk and Site Assessment,” summarizes the risk assessment approach and conclusions. It also provides the conceptual site model for LHAAP-29 and discusses the LHAAP-29 media contamination assessment.
- **Section 3**, “Remedial Action Objectives and Cleanup Levels,” presents the RAOs and a discussion of cleanup levels. The chemical-, location- and action-specific ARARs are presented in this section.
- **Section 4**, “Identification and Screening of Technologies and Process Options,” summarizes the rationale for selecting technologies and process options for remediation of contamination to meet the RAOs.
- **Section 5**, “Development and Description of Alternatives,” presents the rationale for developing a range of alternatives as well as a description of each alternative.
- **Section 6**, “Detailed Analysis of Alternatives,” evaluates, compares, and contrasts the benefits and costs of the alternatives.
- **Section 7**, “References,” presents the references cited in this document.

Appendix A presents the *Investigation Results – 2004 and 2005* which summarizes the activities and results of previous investigations performed at LHAAP-29 by Shaw and USACE during 2004 and 2005 and not previously included in the Administrative Record (AR).

Appendix B presents the *Additional Investigation Data Summary Report* for various sampling activities performed at LHAAP-29 between August 2006 and February 2008 to further delineate the extent of contamination and includes the activated persulfate oxidation study report.

Appendix C presents the *Natural Attenuation Evaluation Report* which provides an evaluation of natural attenuation of groundwater contaminants at LHAAP-29.

Appendix D presents tables and field documentation for sampling events in October 2008, January 2009, and June 2009.

Appendix E presents the cost estimates for the remedial action alternatives.

The preferred alternative for LHAAP-29 will be presented in the PP. The PP will briefly summarize the alternatives studied in this FS, highlighting the key factors that led to identifying the preferred alternative. The U.S. Department of the Army (U.S. Army) will submit the PP to the regulatory agencies, Texas Commission on Environmental Quality (TCEQ) and the U.S. Environmental Protection Agency (USEPA), and then the public for review. After this review, the U.S. Army will release a ROD that documents the selected remedy, certifies that the remedy selection process was carried out in accordance with CERCLA, and addresses public comments

on the PP. Relevant documentation, including the RI, FS, and subsequent documents, are or will be available to the public in the AR for this project. The AR is housed at LHAAP and at the Marshall Public Library in Marshall, Texas.

1.2 Longhorn Army Ammunition Plant Background

1.2.1 Location

The LHAAP is an inactive, government-owned, formerly contractor-operated and -maintained industrial facility located in central-east Texas in the northeastern corner of Harrison County. The installation occupies nearly 8,416 acres between State Highway 43 at Karnack, Texas, and the western shore of Caddo Lake as shown in **Figure 1-1**.

The nearest cities are Marshall, Texas, approximately 14 miles to the southwest, and Shreveport, Louisiana, approximately 40 miles to the east. Caddo Lake, a large freshwater lake situated on the Texas-Louisiana border, bounds LHAAP to the north and east. The industries in the surrounding area consist of agriculture, timber, oil and natural gas production, and recreation.

1.2.2 History

LHAAP was established in December 1941, near the beginning of World War II, when the U.S. Army issued a contract to build a six-line production facility for manufacturing TNT. Various media have been contaminated by past industrial operations and waste management practices at LHAAP. Industrial operations involved the use of secondary explosives, rocket motor propellants, and various pyrotechnics, such as illuminating and signal flares and ammunition. Explosives included TNT and black powder. Typical composite propellants were composed of a rubber binder, an oxidizer such as ammonium perchlorate, and a powdered metal fuel such as aluminum. Pyrotechnics were generally composed of an inorganic oxidizer, such as sodium nitrate, a metal powder such as magnesium, and a binder. Other materials used in the industrial operations included acids, lubricants, and solvents, particularly trichloroethene (TCE) and methylene chloride (MC). Waste management included sanitary wastewater treatment, industrial wastewater treatment, holding/evaporation ponds, storm water drainage, sanitary and contaminated waste landfills, and demolition/burning grounds. Discharges and releases to surface water, groundwater, and other secondary media have occurred from the historical operations and practices.

LHAAP was placed on the National Priorities List (NPL) August 9, 1990. A Federal Facility Agreement (FFA) among the USEPA, the U.S. Army, and the Texas Natural Resources Conservation Commission, now the TCEQ, became effective December 30, 1991. LHAAP became inactive in July 1997, and a year later the U.S. Army issued a contract to remove salvageable property. On May 5, 2004, the U.S. Army transferred approximately 5,032 acres to the U. S. Fish and Wildlife Service (USFWS) for management as the Caddo Lake National

Wildlife Refuge. Approximately 800 acres have been transferred to the USFWS since the initial transfer and the process will continue as response is completed at individual sites. The remaining land is under the U.S. Army's control and includes the Group 2 and 4 sites currently undergoing remedial investigation/feasibility study (RI/FS) studies. The U.S. Army intends to transfer this land to the USFWS after the environmental response is completed.

1.2.3 LHAAP-29 Site Summary

1.2.3.1 Operational History

LHAAP-29 was originally listed as an NPL site in the FFA due to threatened releases of hazardous substances, pollutants or contaminants. LHAAP-29 is a heavily wooded, 85-acre site in the western-central portion of the LHAAP installation (**Figure 1-2**). The site is bounded by Avenue E on the southwest, Zeugner Drive (also known as 1st Street) on the northwest, and 18th Street on the southeast (**Figure 1-3**). Avenue D serves as a portion of the northeastern boundary of LHAAP-29. LHAAP-29 includes the Former Bulk Toluene Storage Area, which is a wooded area that extends for approximately 500 feet northeast of Avenue D. The site is currently inactive, but once contained one standby and five regular TNT production lines. The area still contains the foundations of the former production facilities and the underground pipe lines that were originally built for cooling water drainage and TNT wastewater conveyance.

The production facilities at LHAAP-29 manufactured TNT from October 1942 to August 1945. The facility produced approximately 400 million pounds of flake TNT during its operation. Each production line was essentially the same and consisted of four main elements; an unloading area where acids and toluene were unloaded and held in aboveground storage tanks (ASTs) until use, a nitrating area where flake TNT was produced by nitrating toluene with nitric acid, a wash area where the flake TNT was washed to remove impurities and then dried, and an unloading area where cardboard-boxed flake TNT was loaded onto trucks (Jacobs, 2002).

The former production facilities at LHAAP-29 were served by a network of underground pipelines. The underground lines consisted of TNT wastewater (red liquor) lines and the cooling water (blue water) lines (**Figure 1-3**). The red liquor TNT wastewater line, originally solid waste management unit (SWMU) LHAAP-30 and later included as part of Installation Restoration Program/Defense Site Environmental Restoration Tracking System (IRP/DSERTS) LHAAP-29, was originally installed as a wooden pipeline. The Addendum to the Phase 2 Work Plan noted that the transite waste line was added 5 feet north of the wooden line based on a modified drawing dated March 30, 1943 (Bate Stamp 12651). The transite material is a combination of cement and asbestos. The TNT red water line was clear-flushed in 1946 (Bate Stamp 001446, Resource Conservation and Recovery Act (RCRA) Facility Assessment, April 1988). The transite pipeline was in good condition when it was unearthed in 1993 at a location approximately 400 feet northwest of the pond and at the three locations sampled along the line as

part of the Shaw additional investigation in 2006. The gravity portion of the TNT wastewater line terminates in the pump house area near the intersection of 16th Street with Avenue D.

During TNT production, the wastewater was collected here and pumped through the pressure portion of the TNT wastewater line into storage tanks across Avenue D. The storage tanks and treatment facility are now known as LHAAP-32. As part of the closure, the TNT wastewater pipeline was clear flushed and abandoned in place (Plexus, 2005), and the pump house at LHAAP-29 was removed, and the soil beneath it was excavated. The excavated area subsequently filled with water, and a pond now exists at the former pump house location. The cooling wastewater was conveyed to the Neutralization House (Building 612-A) for neutralization and discharged to surface water.

Two blue cooling water lines exist at LHAAP-29, north and south (**Figure 1-3**), and range from 8 inches to 18 inches in diameter. These gravity fed lines are thought to be constructed of vitrified clay pipe with asbestos wicking. These lines collected water from each TNT washing area. Manholes exist along both the north and south cooling water lines. The northern line is connected to lines from each plant (approximately 280 feet of 10-inch-diameter pipe). The lines drain into a ditch along 16th street which eventually flows into Goose Prairie Creek.

The TNT production facility was inactive from August 1945 to 1959. In 1959, most of the buildings and ASTs were removed. The debris was burned or flashed at Burning Ground No. 2/Flashing Area (LHAAP-17). Concrete foundations, open-top concrete-lined pits, and most of the underground utilities still remain at the site.

Since the end of World War II, the only activity that has been documented to have occurred at LHAAP-29 is the “soak out” of out-of-specification rocket motors. This took place from 1959 to the mid-1970s and involved the use of Turco[®], a MC-based industrial solvent, at tank 801-F. Waste from this operation was sent to LHAAP-18/24 (Jacobs, 2001).

1.2.3.2 Surface Water Hydrology

The terrain of the site generally slopes toward the east and south from a topographic high at the intersection of Zeugner Drive (1st Street) and Avenue E, near the location of former Production Line A. Most of the surface runoff is collected by ditches constructed in 1942 when the production facility was built. Separate drainage ways were constructed for each production line, and these drain to the southeast toward 18th Street. Surface runoff from the northern part of the site (about 40 percent of the site area) enters Goose Prairie Creek located approximately 1,500 feet to the north and east of the site. In the southern portion of the site (about 60 percent of the site), surface runoff flows into a tributary of Central Creek located near the southeast portion of the site (**Figure 1-2**). Via these two creeks, the runoff from LHAAP-29 eventually enters Caddo

Lake. Goose Prairie and Central Creeks, like all drainage systems at LHAAP, are intermittent (Jacobs, 2001).

1.2.3.3 *Hydrogeology*

Based on investigations, there are three groundwater zones at LHAAP-29: shallow, intermediate, and deep. Clay or silty clay layers separate the three groundwater zones. The shallow groundwater zone has wells that are screened at two depths (shallow and lower shallow); however, the wells have similar water level elevations and are all considered to be shallow zone wells. The depth of the shallow groundwater zone generally ranges from 17 to 45 feet below ground surface (bgs) because of variable ground surface elevations across the site. The intermediate zone is less defined, but its depth has been measured to approximately 88 feet bgs. The deep groundwater zone extends to a depth of approximately 155 feet bgs. The predominant flow of both the shallow and intermediate groundwater zones is to the east/northeast based on November 2007 water levels.

Groundwater in the deep zone under and near LHAAP is currently used as a drinking water source. There are currently five active water supply wells near LHAAP. Known depths of these wells range from 313 to 430 feet bgs and are at least 4,000 feet away from LHAAP. Water removal from these wells is not expected to affect groundwater flow at the site because of the remote locations of these wells from LHAAP and their depth of completion. In addition, there are several livestock and domestic wells located in the vicinity of LHAAP with depths averaging 250 feet. There are three water supply wells located on LHAAP, and they supply water to the buildings currently in use on the installation. None of these wells is used for drinking water. Two additional wells previously supplied water to the installation, but these have been plugged and abandoned. None of the potable water supply wells are associated with or are in imminent danger from the localized contaminated groundwater at any of the Group 2 sites, including LHAAP-29.

1.3 *Sampling Investigations at LHAAP-29*

The environmental media (soil, groundwater, surface water, sediment, and residue in process water lines) at LHAAP-29 have been the subject of numerous investigations to identify potential contamination and are summarized in **Table 1-1**. These include the Pre-RI investigations by Environmental Protection Systems in 1982 and 1987; the Phase I, Phase II, and Phase III RIs conducted by Jacobs in 1993, 1995, and 1998, respectively; the site-wide perchlorate investigation conducted by Solutions To Environmental Problems, Inc. (STEP) in 2002 and the Environmental Site Assessment (ESA) activities performed by Plexus in 2003. Additional samples were not collected in the ESA, but soil staining was noted around Buildings 806-A and 806-D (Plexus, 2005). Reports mentioned above are included in the AR for the LHAAP.

Between 2004 and 2005, several follow-up investigations at LHAAP-29 were performed by Shaw and USACE to further delineate the extent of contamination identified during the previous sample events. These sample events include the data gaps investigation by Shaw in the spring and summer of 2004 (Shaw, 2007a); additional explosives and perchlorate sampling by Shaw in December 2004 and February 2005 (**Appendix A**), and explosives sampling by USACE at a building foundation in February 2005 (**Appendix A**). A summary of activities and analytical results for the 2004 through 2005, Shaw and USACE sample events, is presented in the *Investigation Results – December 2004 and February 2005* (**Appendix A**).

Between August 2006 and February 2008, Shaw conducted additional investigation activities for various environmental media at LHAAP-29. The objective of this sampling event was to collect samples of the transite wastewater line residual contents, sediment samples along the former cooling water ditch, and groundwater from existing and newly installed monitoring wells to further delineate the extent of contamination at the site. A summary of activities and data results for these sample events are included in the *Additional Investigation Data Summary Report* (**Appendix B**).

In October 2008 and January 2009, additional groundwater samples were collected and analyzed for metals and volatile organic compounds (VOCs) in the shallow and intermediate zones.

In June 2009, one new monitoring well (29WW41) was installed and sampled for VOCs to determine whether groundwater in the upper deep zone immediately below the highest MC concentration in the intermediate zone (at 29WW16) showed any evidence of contamination. Well 29WW41 was screened at a depth of 102.5 to 117.5 feet bgs. A groundwater sample was collected for VOC analysis. This deeper well was installed to evaluate the potential downward migration of contaminants in the intermediate zone. Only VOCs have been identified as COCs in the intermediate zone, and thus the sample was analyzed for VOCs.

The sample locations from all phases of investigations performed at LHAAP-29 are presented on **Figures 1-4** through **1-7** for soil, sediment and surface water, and groundwater, respectively.

1.4 Additional Evaluations at LHAAP-29

The baseline ecological risk assessment (BERA) was completed in February 2007 (Shaw, 2007b). The BERA concluded there is an ecological impact in an isolated area at LHAAP-29, as discussed in **Section 2.2**.

Appendix B includes the Activated Persulfate Oxidation Treatability Study Report completed by Shaw in 2006 to evaluate the effectiveness of chemical oxidation using activated sodium persulfate to treat the MC groundwater plume in the intermediate zone. The treatability study

concluded that heat- and alkaline-activated persulfate oxidation was the best treatment evaluated for the reduction of MC.

In February 2007, monitored natural attenuation (MNA) was evaluated by Shaw as a potential site remedy at LHAAP-29. The results and conclusions of the assessment are included in the *Natural Attenuation Evaluation* for LHAAP-29 presented in **Appendix C**.

In February 2007, Shaw issued a modeling report that concluded the VOC contaminants in the shallow zone will not reach Central Creek. The model indicates that even though perchlorate reaches the creek, the concentration in surface water will be below the surface water action level (Shaw, 2007c). Thus, there is no impact of surface water from the shallow groundwater at LHAAP-29.

Table 1-1
Summary of Investigations at LHAAP-29

Pre-Phase I (Jacobs, 2001)
LHAAP Plant Contamination Survey Environmental Protection System, June 1984
<ul style="list-style-type: none"> • Six monitoring wells were installed and sampled (114 to 119) • Four surface water and four sediment samples were collected (stations 005-008) • Eight soil samples were collected within the former TNT production area
Final Remedial Investigation Report for LHAAP, Karnack, Texas, Environmental Protection System, May 1988
<ul style="list-style-type: none"> • Six groundwater samples were collected from existing monitoring wells • Thirty-five soil boreholes were sampled at the 0-0.5', 1-1.5', 2-2.5' and 3-3.5' intervals • Four surface water and four sediment samples were collected
Phase I – Phase III (Jacobs, 2001)
Jacobs, Phase I, 1993
<ul style="list-style-type: none"> • Eighteen surface water and 18 sediment samples were collected (29SW01-29SW18 and 29SD01-29SD18) • Seventy-five soil samples were collected from borings 29SB01-29SB15 • Four waste line samples were collected • Groundwater samples were collected from the existing wells 114-119
Jacobs, Phase II, 1995
<ul style="list-style-type: none"> • Three surface water and three sediment samples were collected (29SW19-29SW21 and 29SD29-29SD21) • Forty-four soil samples were collected from borings 29SB53-29SB76 • Four waste line samples and six waste line associated soil samples were collected • Eleven monitoring wells were installed (29WW01 – 29WW11) and groundwater was collected from each new well and from six existing wells (114-119)
Jacobs, Phase III, 1998
<ul style="list-style-type: none"> • Ten surface water and ten sediment samples were collected (29SW22-29SW31 and 29SD22-29SD31) • Fourteen soil samples were collected from borings 29SS01 - 29SS08 • Twenty-two monitoring wells were installed (29WW12-29WW33) and groundwater was collected from each new well and from 17 existing wells (114-119 and 29WW01-29WW11)
Additional Investigations
<ul style="list-style-type: none"> • Collected 56 soil samples and 72 groundwater samples for perchlorate analysis in 2000 through 2002 (STEP, 2005) • Soil staining verified TNT through field tests at 2 locations (Plexus, 2005) • USACE sampling of stained soil (Appendix A, Table A-5) • Collected 10 soil samples from borings (29SB81-29SB85) for explosives, and 12 soil samples from borings (29SB86-29SB89) for perchlorate in 2004. (Appendix A) • Collected 8 solid residue samples from manholes and 3 sediment samples from ditches (up through 29SD46) for explosives analysis in 2004. (Shaw, 2007a) • Collected groundwater samples from 20 wells for explosives, VOCs and perchlorate in 2004. (Shaw, 2007a) • Collected groundwater samples from 41 wells for explosives, VOCs and perchlorate in 2005. (Shaw, 2007a) • Collected 3 sediment samples from ditches (29SD47-29SD49), 3 solid residue samples from the transite waste line for explosives analysis, and 1 deep soil sample (29WW40) for VOCs analysis in 2006. (Appendix B) • Six monitoring wells were installed (29WW35-29WW40) and 15 groundwater samples were collected for volatiles, 11 for general chemistry, and 2 for perchlorate in 2006. (Appendix B) • Collected 2 groundwater samples from 29WW37 and 29WW39 for VOCs analysis in February 2008. (Appendix B) • Collected groundwater samples from 5 wells for natural attenuation evaluation (biological, VOCs, explosives, gases, general chemistry) in 2007. (Appendix C) • Collected 20 additional groundwater samples for metals and VOCs in 2008 (Appendix D) • Installed new well, 29WW41, in the upper deep zone and sampled the well for VOCs (Appendix D)

PLOT DATE: 1/10/08
FORMAT REVISION 5/13/02

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
TYLER(250_000)	---	Houston, Texas	J. RDZ	1/10/08	D. CRISPO	1/10/08	P. SRIVASTAV	1/10/08	117591-A2



LEGEND:

— LHAAP SITE BOUNDARY



REFERENCE:

U.S.G.S. QUADRANGLE OF
TYLER, TEXAS; LOUISIANA 1956, REVISED 1977
SCALE 1:250,000

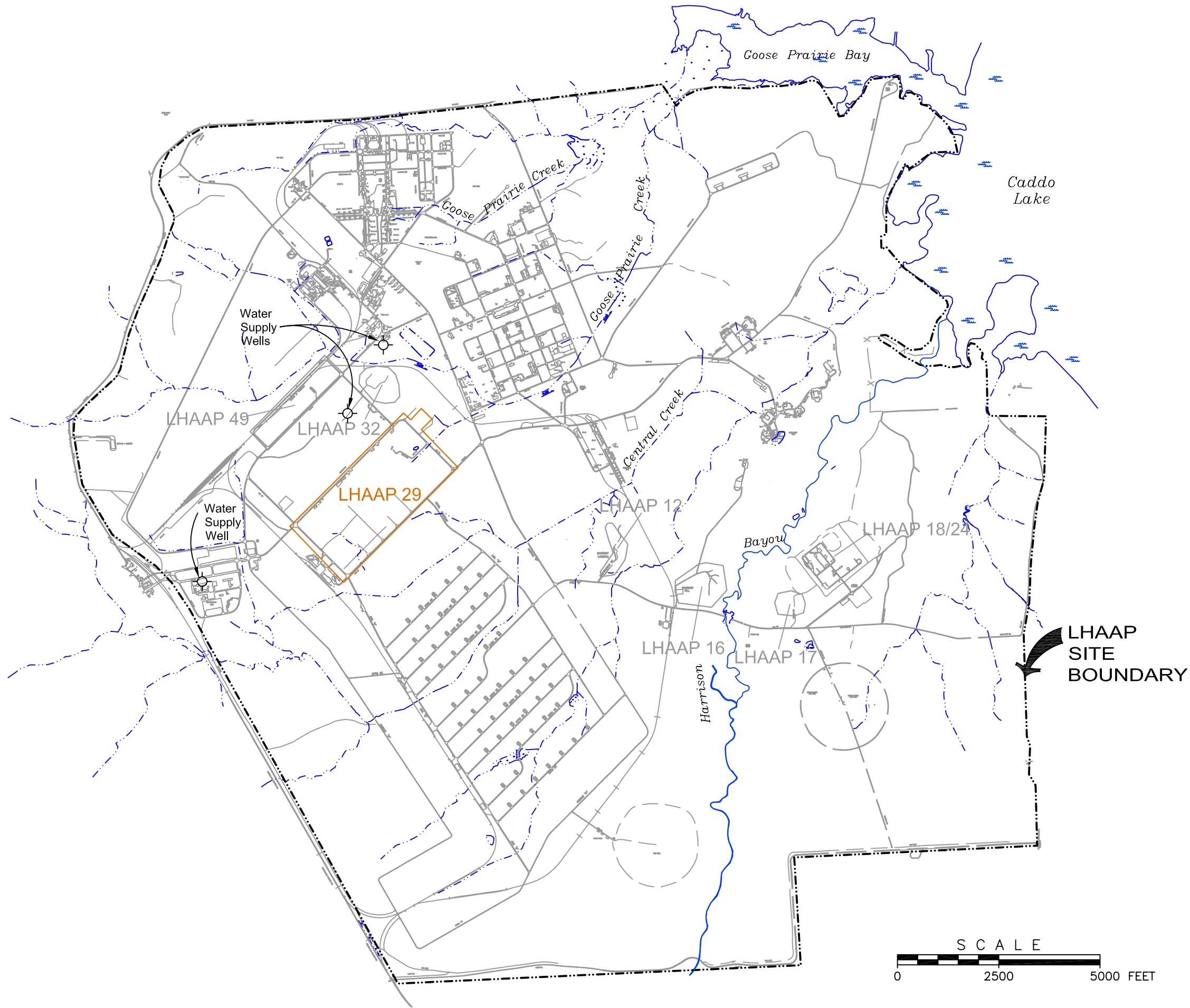
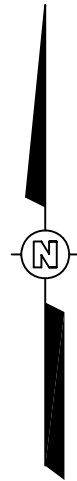


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TULSA DISTRICT
TULSA, OKLAHOMA


FIGURE 1-1
LHAAP LOCATION MAP
LHAAP-29 FEASIBILITY STUDY
LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING
---	BASE	Houston, Texas	J. RDZ	S. WATSON	P. SRIVASTAV	NUMBER
			1/23/06	03/09/09	03/09/09	117591-B1

PLOT DATE: 1/10/08
FORMAT REVISION 3/25/99

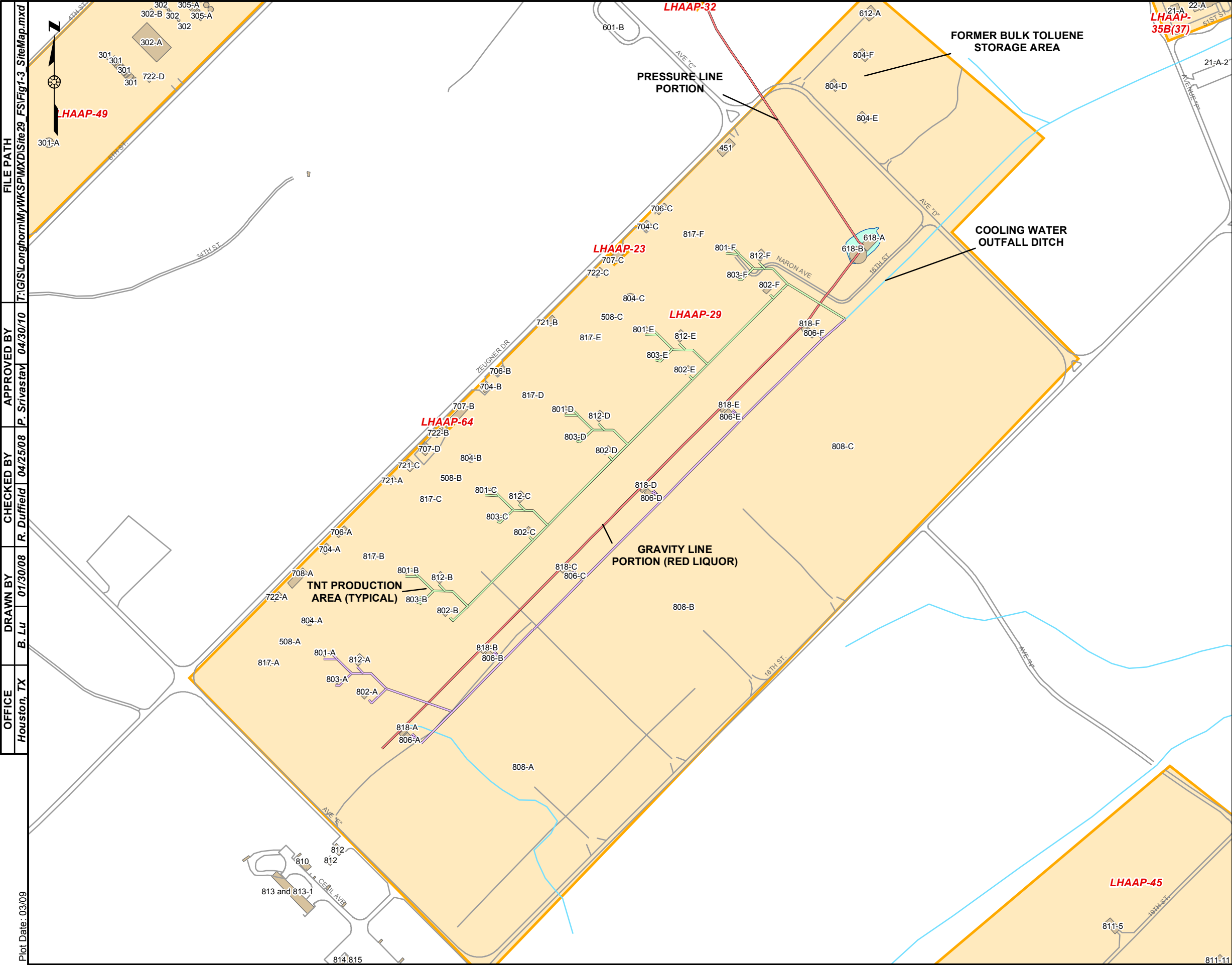


LHAAP GROUP 2 SITES	
LHAAP 12	LANDFILL 12
LHAAP 16	LANDFILL 16
LHAAP 17	BURNING GROUND No. 2 AND FLASHING AREA
LHAAP 18/24	BURNING GROUND No. 3/ UNLINED EVAPORATION POND
LHAAP 29	FORMER TNT PRODUCTION AREA
LHAAP 32	FORMER TNT WASTE DISPOSAL AREA
LHAAP 49	FORMER ACID STORAGE AREA



U.S. ARMY CORPS OF ENGINEERS
TULSA DISTRICT
TULSA, OKLAHOMA

FIGURE 1-2
SITE LOCATION MAP-GROUP 2 SITES
LHAAP-29 FEASIBILITY STUDY
LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS



FILE PATH T:\GIS\Longhorn\MyWKS\PMXD\Site29_FSI\Fig1-3_SiteMap.mxd
APPROVED BY P. Srivastav 04/30/10
CHECKED BY R. Duffield 04/25/08
DRAWN BY B. Lu 01/30/08
OFFICE Houston, TX

Plot Date: 03/09

LEGEND

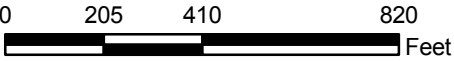
- TNT Cooling Water Drain Line (South)
- TNT Cooling Water Drain Line (North)
- TNT Wastewater Lines (Wood/Transite)
- Stream
- Road
- Former Building or Concrete Slab
- Pond
- Site

Former Buildings and Structures in or Adjacent to LHAAP-29

Structure or Building Number	Description	Materials Handled
Original Use (1942-1945)		
451	Compressed Air Plant	---
508-A to -C	Start-Up Mixed Acid Storage	Acids
612-A	Neutralization House	Cooling water from production (blue water)
618-A	Pump House	TNT waste water (red liquor)
618-B	Wooden Storage Tank	TNT waste water (red liquor)
704-A to -C	Supervisor's Office	---
706-A to -C	Solvent Storage Building and/or Powder Magazine	Solvents
707-B to -D	Change House	---
708-A	Garage Building	---
721-A to -C	Inspector's Office	---
722-A to -C	Paint Shop	---
801-A to -F	Mono-Nitrating House	Toluene, nitrotoluene, nitric acid, sulfuric acid
802-A to -F	Tri-Nitrating House	Dinitrotoluene, TNT, nitric acid, sulfuric acid
803-A to -F	Bi-Nitrating House	Nitrotoluene, dinitrotoluene, nitric acid, sulfuric acid
804-A to -C	Toluene Working Storage	Toluene
804-D to -F	Toluene Tank	Toluene
806-A to -F	Wash House	TNT, caustic soda, sellite, residual acids, TNT wastewater (red liquor), yellow liquor
808-A to -C	Nail House	TNT, boxes, nails
812-A to -F	Acid & Fume Recovery House	Nitric acid fumes, recovered acid
817-A to -F	Oleum Storage	Oleum
818-A to -F	Barricade	---
Subsequent Use		
707-C	General Purpose Warehouse	---
801-F	Rocket Motor Soak-Out Facility	Out-of-specification rocket motors containing composite propellants (e.g. polysulfide perchlorate), methylene chloride-based industrial solvent, liquid solvent waste, lubricants, polymers, fuels

--- Not documented
Reference: Environmental Site Assessment, Phase I and II Report (Plexus, 2004)

- Notes:
- Manholes located along the TNT cooling water drain line.
 - 806 series buildings are wash houses and generated red liquor.

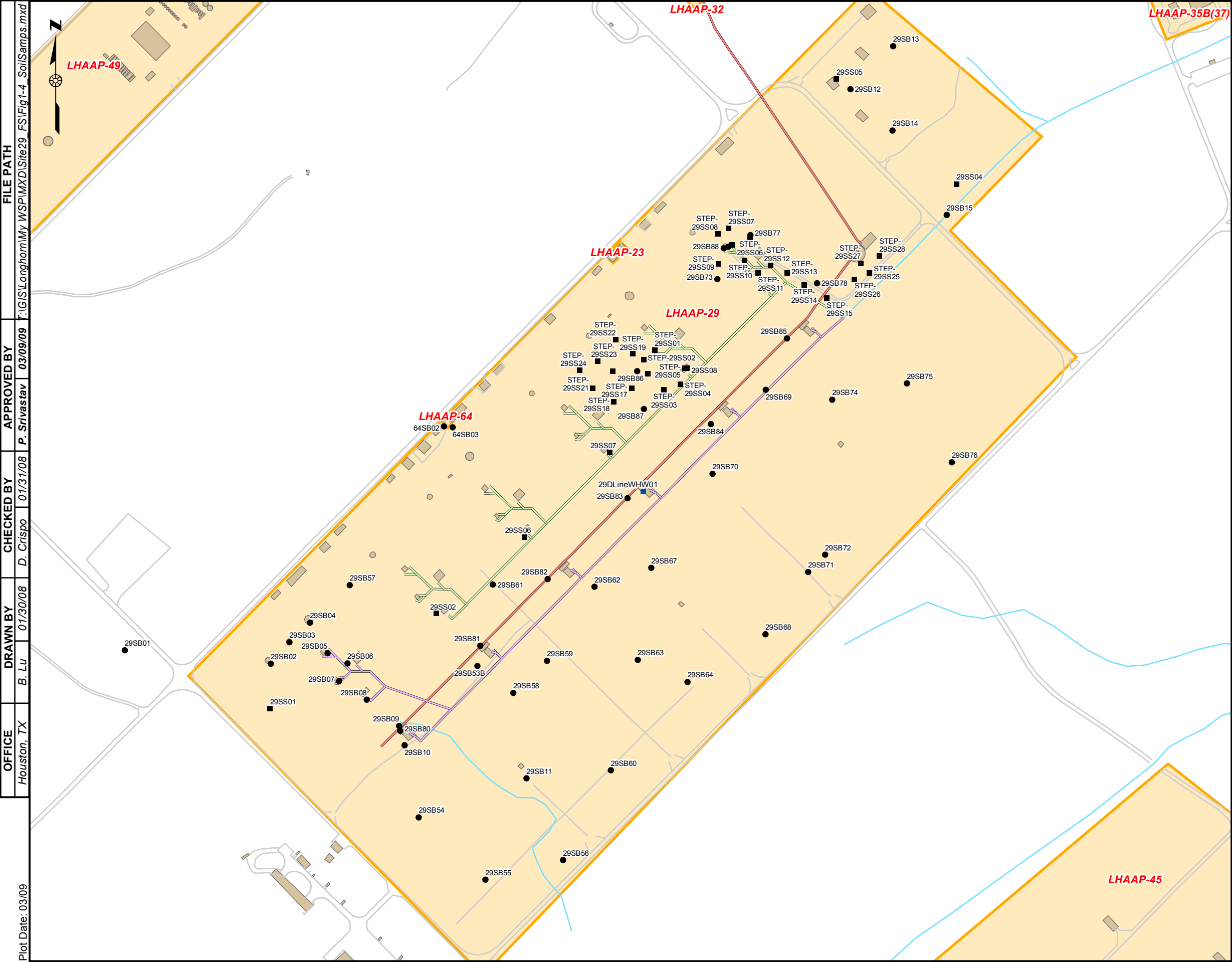


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TULSA DISTRICT
TULSA, OKLAHOMA

FIGURE 1-3

SITE MAP
LHAAP-29 FEASIBILITY STUDY

LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS



OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	FILE PATH
Houston, TX	B. Lu	D. Crispo	P. Srivastav	T:\GIS\Longhorn\My WSP\MXD\Site29_FS\Fig 1-4_SoilSamps.mxd

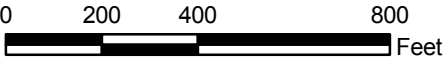
Plot Date: 03/09

LEGEND

Sample Locations

- Soil Boring
- Surface Soil
- Approximate Surface Soil Sample Location
- TNT Cooling Water Drain Line (South)
- TNT Cooling Water Drain Line (North)
- TNT Wastewater Line
- Stream
- Road
- Former Building or Concrete Slab
- Site

Note:
Soil sample locations from all investigation phases.

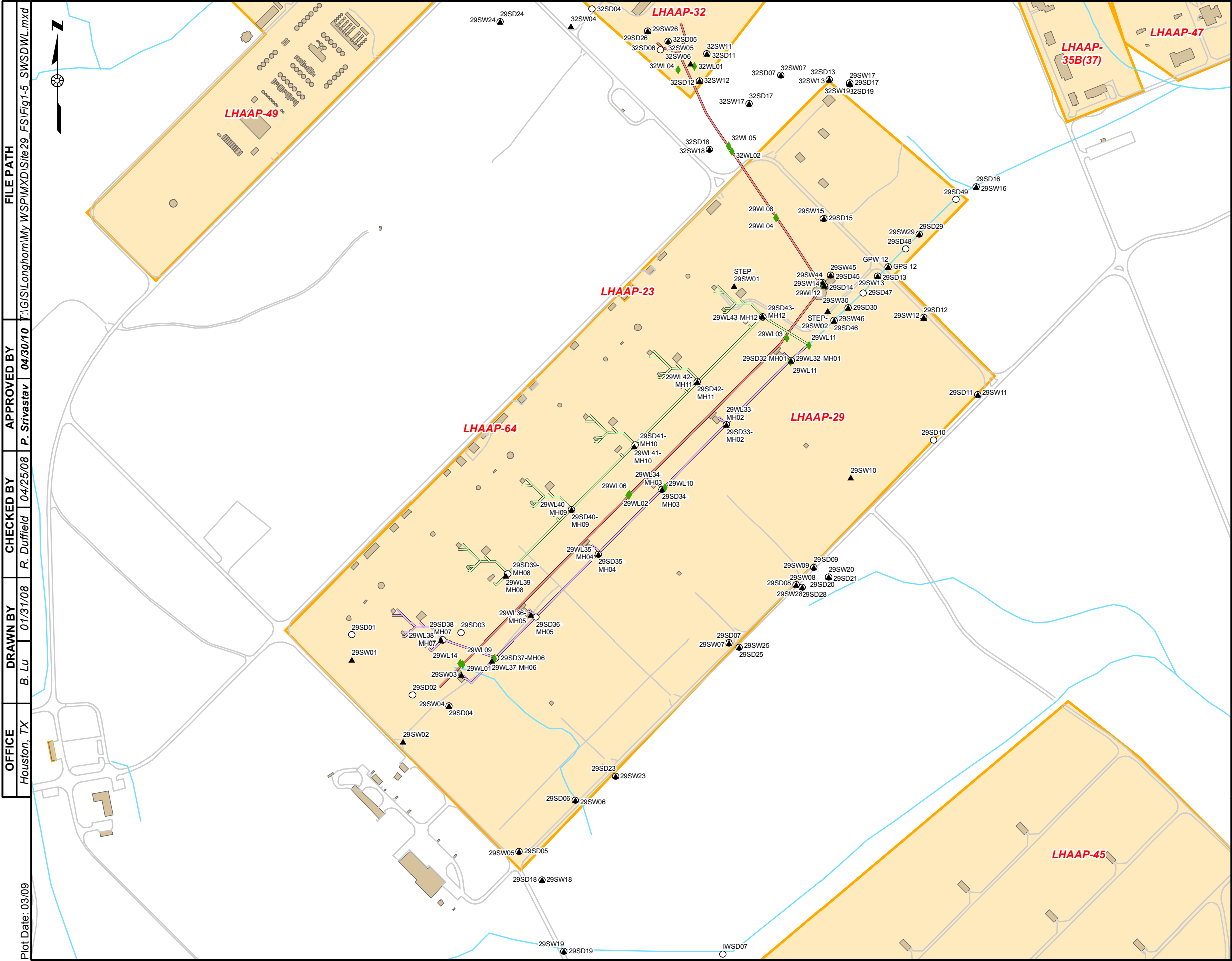


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TULSA, OKLAHOMA

FIGURE 1-4

SAMPLE LOCATIONS - SOIL
LHAAP-29 FEASIBILITY STUDY

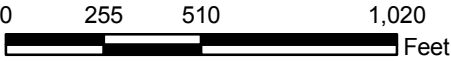
LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS



LEGEND

- ▲ Surface Water Sample
- Sediment Sample
- ◆ Water Line Sample
- TNT Cooling Water Drain Line (South)
- TNT Cooling Water Drain Line (North)
- TNT Wastewater Line
- Stream
- Road
- Former Building or Concrete Slab
- Site

Note:
Sample locations from all investigation phases.

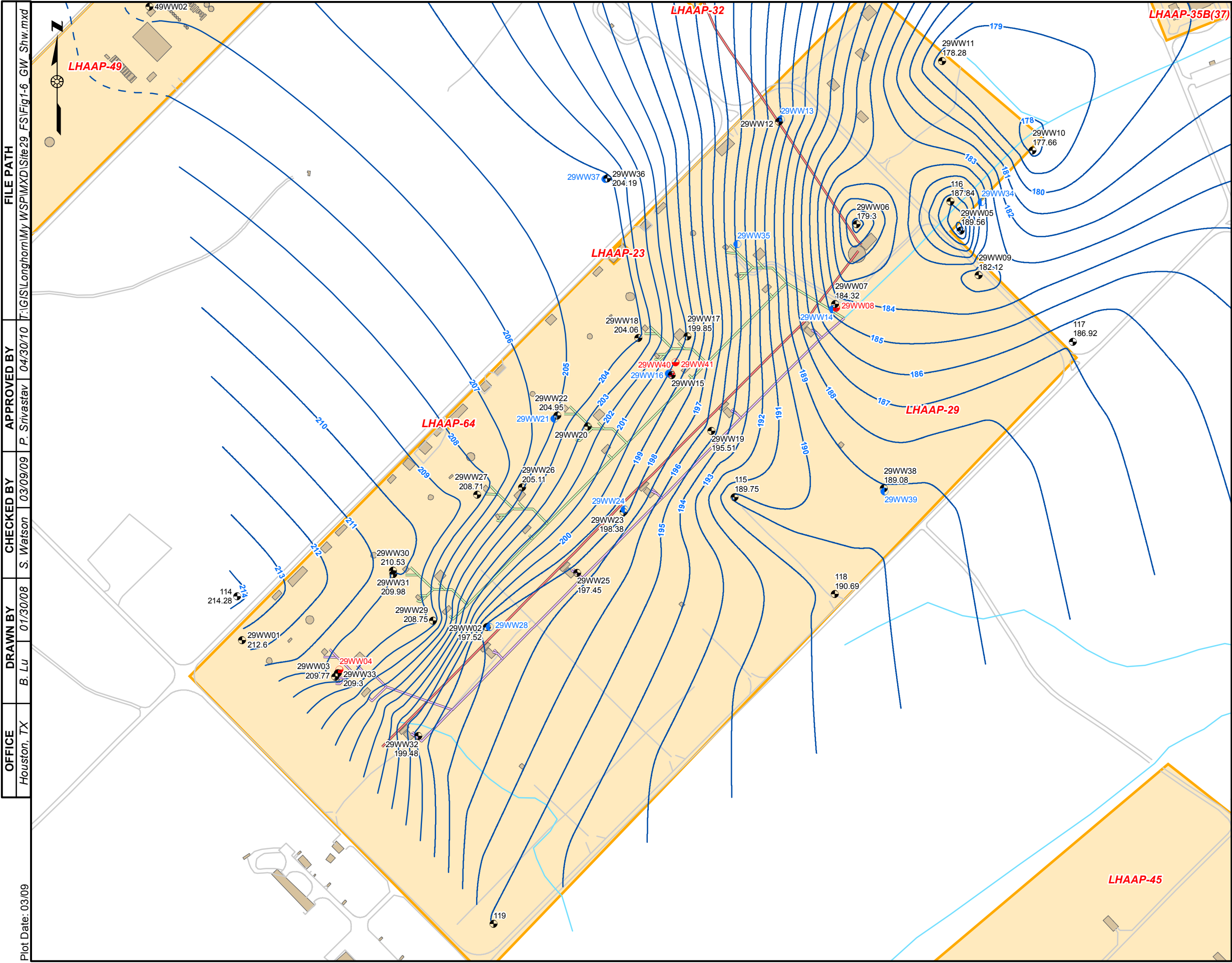


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TULSA DISTRICT
TULSA, OKLAHOMA

FIGURE 1-5
SAMPLE LOCATIONS - SURFACE WATER,
SEDIMENT, AND WASTEWATER LINES
LHAAP-29 FEASIBILITY STUDY
LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS

OFFICE Houston, TX	DRAWN BY B. Lu	CHECKED BY R. Duffield	APPROVED BY P. Srivastav	FILE PATH T:\GIS\Longhorn\My WSP\MXD\Site29_FSI\Fig1-5_SWSDWL.mxd

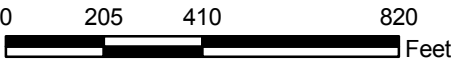
Plot Date: 03/09



LEGEND

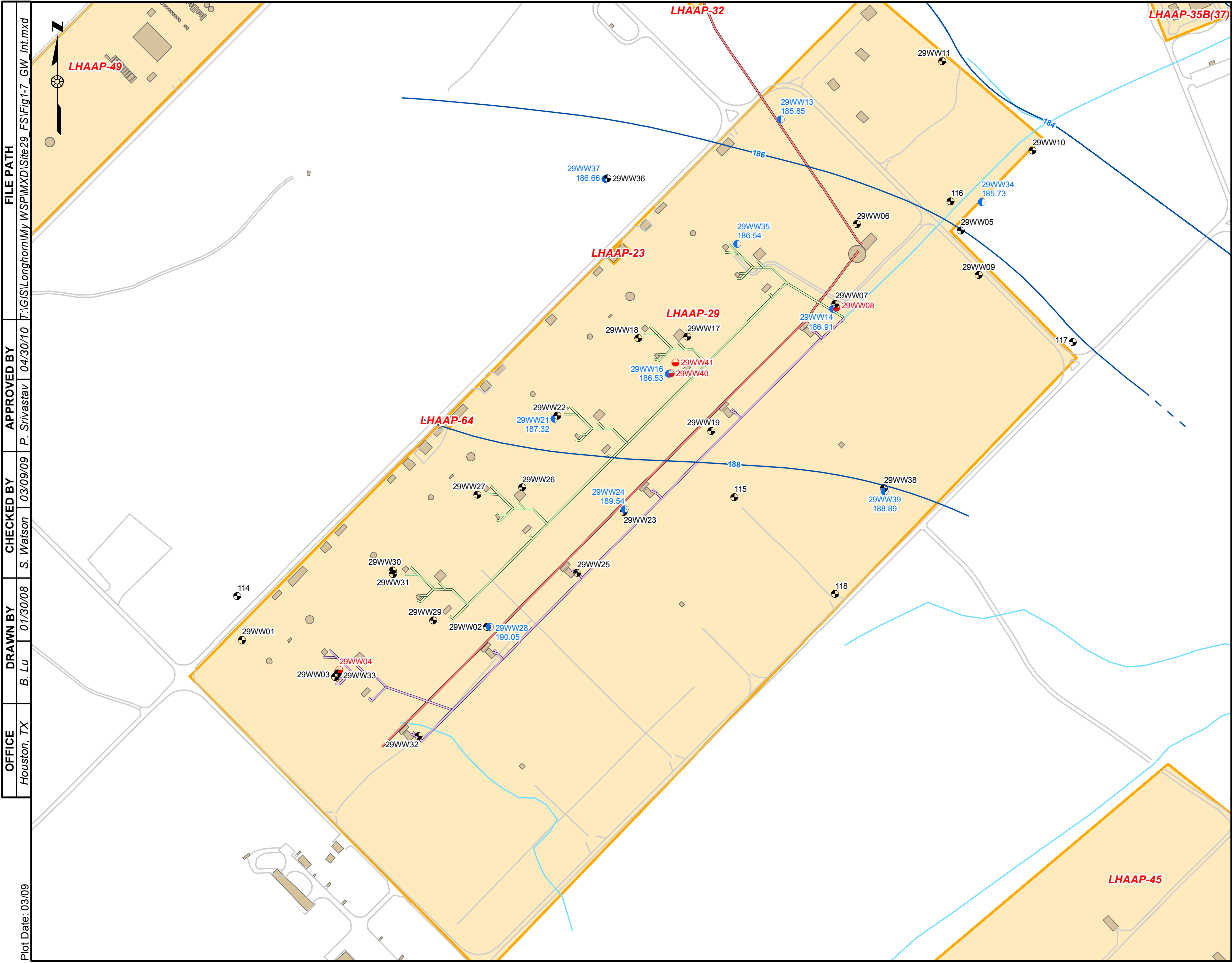
- Shallow or Lower Shallow Monitoring Well
- Intermediate Monitoring Well
- Deep Monitoring Well
- Groundwater Elevation Contour
- Inferred Groundwater Elevation Contour
- TNT Cooling Water Drain Line (South)
- TNT Cooling Water Drain Line (North)
- TNT Wastewater Line
- Stream
- Road
- Former Building or Concrete Slab
- Site

Note:
Groundwater contours are based on data collected November 29, 2007 through December 3, 2007.



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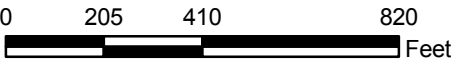
FIGURE 1-6
GROUNDWATER ELEVATION --
SHALLOW ZONE
LHAAP-29 FEASIBILITY STUDY
LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS



LEGEND

- Shallow or Lower Shallow Monitoring Well
- Shallow/Intermediate Monitoring Well
- Intermediate Monitoring Well
- Deep Monitoring Well
- Groundwater Elevation Contour
- Inferred Groundwater Elevation Contour
- TNT Cooling Water Drain Line (South)
- TNT Cooling Water Drain Line (North)
- TNT Wastewater Line
- Stream
- Road
- Former Building or Concrete Slab
- Site

Note:
Groundwater contours are based on data collected November 29, 2007 through December 3, 2007.



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FIGURE 1-7
GROUNDWATER ELEVATION --
INTERMEDIATE ZONE
LHAAP-29 FEASIBILITY STUDY
LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS

OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	FILE PATH
Houston, TX	B. Lu	S. Watson	P. Srivastav	T:\GIS\Longhorn\My WSPM\XDI\Site29_FS\Fig1-7_GW_Int.mxd

Plot Date: 03/09

2.0 Risk and Site Assessment

This section summarizes the risk assessment approach, risk conclusions, media contamination evaluation, and the conceptual site model for LHAAP-29. Information in this section is based on data obtained from the following references:

- Group 2 Sites RI (Jacobs, 2001)
- Group 2 Sites Baseline Human Health Risk Assessment Report (Jacobs, 2002)
- Groups 2 and 4 Groundwater Data Gaps Investigation (Shaw, 2007a)
- Installation-Wide Baseline Ecological Risk Assessment (Shaw, 2007b)
- Environmental Site Assessment (Plexus, 2005)

2.1 Human Health Risk Assessment

This summary is based on the conclusions presented in the *Final Baseline Human Health and Screening Ecological Risk Assessment for the Group 2 Sites* (Jacobs, 2002). The Jacobs risk assessment presented the human health risks and hazards to a hypothetical future maintenance worker under an industrial scenario for soil and groundwater and a screening level ecological risk assessment. For the risk assessment, soil and groundwater data were used to calculate the aggregate risk values, which were then compared to the USEPA target risk range of 1×10^{-4} to 1×10^{-6} for the excess lifetime cancer risk (ELCR) and a hazard index (HI) of 1.

2.1.1 Soil

For the hypothetical future maintenance worker exposure to soil at LHAAP-29, the carcinogenic risk of 7.3×10^{-6} is within the USEPA target risk range of 1×10^{-4} to 1×10^{-6} ELCR, but the non-carcinogenic hazard has an HI of 1. Chemicals in soil with a hazard quotient (HQ) greater than 0.1 are listed in **Table 2-1**.

2.1.2 Groundwater

For the hypothetical future maintenance worker's exposure to the groundwater at LHAAP-29, the carcinogenic risk and non-carcinogenic hazard exceed the acceptable limits. Groundwater chemicals with unacceptable risk were also compared to their associated Safe Drinking Water maximum contaminant levels (MCLs), if applicable. The total carcinogenic risk from groundwater for a hypothetical future maintenance worker is 3.9×10^{-1} . The total HI is 3,000. Chemicals with a risk greater than 1×10^{-6} , and a HQ greater than 0.1 are listed in **Table 2-2** and **Table 2-3**, respectively. The data were evaluated to determine if the chemical should be retained as a COC as shown in **Table 2-2** and **Table 2-3**.

2.2 Ecological Risk Assessment

The *Final Installation-Wide Baseline Ecological Risk Assessment* (Shaw, 2007b) evaluated potential hazards to ecological resources at LHAAP by conducting a screening evaluation to identify initial contaminants of potential ecological concern (COPEC) in the individual sub-areas and watersheds. The potential of these COPECs to adversely affect communities was evaluated for (1) organisms that have direct contact with the COPECs (e.g., plants and earthworms growing and living in contaminated soil); and (2) organisms that may be exposed to the chemicals via food chain pathways (e.g., ingestion of an earthworm living in the contaminated soil by a shrew). Potential impacts to invertebrate and plant communities were evaluated by comparing COPEC concentrations to benchmark values available from multiple literature sources. For the food chain exposure assessment, a number of measurement receptors were selected as representative species for the various trophic levels in the food web that could be at risk from contaminants in site media. The measurement receptors that were selected and used in the food chain evaluation included the following:

- Deer Mouse
- Raccoon
- Modified Raccoon (as a surrogate for the Louisiana Black Bear)
- Short-Tailed Shrew
- Red Fox
- Muskrat
- River Otter
- Townsend's Big-Eared Bat
- Common Snapping Turtle
- Bank Swallow
- American Woodcock
- Belted Kingfisher
- Red-Tailed Hawk

A food chain model was developed and used to estimate the total dose for each measurement receptor based on species-specific considerations such as diet, body weight, ingestion rates, etc., using conservative exposure estimates. Ecological hazard estimates were developed based on exposure to all media including soil in a particular sub-area and surface water and sediment from any watersheds present in the sub-areas. Two different soil depths were used for modeling exposure to ecological receptors: surface soil (0 to 0.5 foot) and total soil (0 to 3 feet). Each receptor was assumed to be exposed to one of the two depths based on its life history characteristics (e.g., burrowing animals were assumed to be exposed to total soil). Bioaccumulation of chemicals up the food chain was initially estimated using uptake factors

obtained from available literature, and then refined using site-specific data obtained during the BERA.

Ecological effects quotients (EEQ) were developed for each of the measurement receptors. EEQs are similar to HQs for human health, and are calculated by dividing the total dose that the receptor is exposed to by the toxicity reference value (TRV), which is based on a no-observed adverse effect level (NOAEL) or the lowest-observed adverse effect level (LOAEL) concentration. If the EEQ exceeds 1 for a receptor (based on the NOAEL TRV), then that chemical is considered to have a realistic potential to cause adverse ecological impacts, and is identified as a final COPEC that should be addressed either through remediation or further investigation. As discussed in the BERA, there are several important uncertainties associated with the assumptions used in the EEQ process, and it should be noted that EEQs greater than 1 do not necessarily mean that ecological impacts have occurred, or are occurring.

For the Industrial Sub-Area (which includes LHAAP-29) four chemicals were selected as final COPECs: cadmium, chromium, zinc, and perchlorate. After that selection, additional sampling data became available, and further analysis was performed, leading to the calculation of ecological preliminary cleanup levels (EcoPRGs) for several chemicals in soil. The final COPECs that were initially selected were found to not be of concern and EcoPRGs were calculated for six other chemicals: barium, lead, 2,4-dinitrotoluene (DNT), 2,6-DNT, TNT, and 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD).

Ecological hazards were found to be acceptable for the Industrial Sub-Area that includes LHAAP-29; however, elevated concentrations of nitrotoluenes (TNT, 2,4-DNT and 2,6-DNT) were identified at one location at the site (Shaw, 2007a). Although nitrotoluenes were not selected in the Industrial Sub-Area as final COPECs due to low frequency of detection and other considerations, the BERA evaluated measurement receptors and included a spatial analysis at this sample location at LHAAP-29. The results of this analysis identified that the nitrotoluenes at this location and the adjacent areas may represent a small area of highly elevated concentrations (i.e., a hot spot) that could pose a threat to small-range ecological receptors either through acute toxicity, or as a source area for downgradient surface water transport of contamination (Shaw, 2007b). Therefore, the nitrotoluenes are considered as COPECs at LHAAP-29. The maximum nitrotoluene concentrations identified in the upper three feet of soil at LHAAP-29 are compared to EcoPRGs in **Table 2-4**.

With the exception of the nitrotoluene hot spot near sample location 29SD46 along the former cooling water outfall ditch, ecological hazard was determined to be within acceptable limits in the Industrial Sub-Area, and therefore within LHAAP-29. The soil in the former cooling water outfall ditch is thought to be contaminated as a result of deposition, spills, and/or runoff of contamination on the surface. This residual contamination poses a potential risk to ecological

receptors due to the direct contact with soil and indirect (i.e., dietary) exposure routes. The principal ecological risk drivers for the soil in the ditch are TNT and its breakdown products.

2.3 *Evaluation of Data Collected Since the Risk Assessment*

The risk assessment was completed using data from the samples through February 2001 for groundwater and through 1998 for soil samples. Since that time, additional groundwater and soil samples have been collected and analyzed.

2.3.1 *Soil*

Additional soil samples were collected during the perchlorate investigation in 2002 (STEP, 2005), during the data gaps investigation in 2004 (Shaw, 2007a), and in the USACE 2005 sampling of stained soil at Wash Building 806-D (**Appendix A**). The following text discusses chemicals that were detected in the 2004 and 2008 investigations (after the risk assessment) with concentrations higher than their associated exposure point concentration (EPC) used in the risk assessment.

From the data gaps investigation, the maximum perchlorate concentration detected in soil was 8.6 milligrams per kilogram (mg/kg) in sample 29SB86-002 (Shaw, 2007a). This is greater than the EPC for perchlorate of 0.0703 mg/kg used in the risk assessment, with an associated HQ of 8.1×10^{-5} (Jacobs, 2002). Using ratios of the HQ to the perchlorate concentrations, the HQ for the maximum concentration of perchlorate detected since the risk assessment would yield a HQ of 0.0099. Thus, perchlorate in soil does not pose a hazard to human health. However, perchlorate is a contaminant in the groundwater. The most recent soil sample with a perchlorate concentration of 8.6 mg/kg exceeds the soil medium-specific concentration (MSC) for industrial use based on groundwater protection (GWP-Ind) (TCEQ, 2006) of 7.2 mg/kg for perchlorate. Thus, perchlorate in soil will be carried as a COC with the potential to migrate to groundwater.

The maximum 2-amino-4,6-DNT concentration detected in soil from the data gaps investigation was 48 mg/kg in sample 29SD46 (Shaw, 2007a). This is greater than the EPC for 2-amino-4,6-DNT of 25 mg/kg used in the risk assessment with an associated HQ of 0.33 (Jacobs, 2002). Using ratios of the HQ to the 2-amino-4,6-DNT concentrations, the HQ for the maximum concentration of 2-amino-4,6-DNT detected since the risk assessment would yield a HQ of 0.63, still less than 1.0 and not carried as a COC.

The maximum 2,4-DNT concentration detected in soil was 8,000 mg/kg in sample 29SD46 collected during the data gaps investigation (Shaw, 2007a). The risk assessment EPC for 2,4-DNT was 6.2 mg/kg, with an associated HQ of 0.0053 (Jacobs, 2002). Using ratios of the HQ to the 2,4-DNT concentrations, the HQ for the maximum concentration of 2,4-DNT detected since the risk assessment would yield a HQ of 6.8, which is unacceptable. Thus, 2,4-DNT will

be carried as a COC for human health. The higher recent maximum also caused 2,4-DNT to be selected as a COPEC.

The additional detected soil sample results were less than the EPCs and do not change the conclusion of the risk assessment that soil poses an unacceptable total HI. The recent results indicate that 2,4-DNT and perchlorate should be added as COCs. **Figure 2-1** shows areas of soil contamination.

2.3.2 Groundwater

Additional groundwater samples have been collected since the risk assessment and analyzed for explosives, perchlorate, VOCs, semivolatile organic compounds (SVOCs), and attenuation parameters (**Appendices B and C**). No new chemicals were detected that would change the listed chemicals in **Table 2-2** or **Table 2-3**. Eight chemicals, (MC, 1,2-dichloroethane [DCA], 2,4-DNT, 2,6-DNT, arsenic, TCE, 2,3,7,8-TCDD, and chloroform) had a carcinogenic risk greater than 1×10^{-6} . Seventeen additional chemicals, (perchlorate, 4-nitrotoluene, 2-nitrotoluene, nickel, 3-nitrotoluene, aluminum, antimony, barium, selenium, manganese, vanadium, thallium, 2-amino-4,6-DNT, 4-amino-2,6-DNT, strontium, silver and cadmium) had an HQ greater than 0.1. **Figures 2-2 through 2-4** show areas of groundwater contamination.

The EPCs for 2,3,7,8-TCDD and chloroform were less than the MCLs and these chemicals were not retained as COCs.

Additional Sampling 2008 and 2009

In October 2008, groundwater samples were collected and analyzed for (1) VOCs in the intermediate wells within the VOC plume and (2) for metals in all three zones since the last sampling round for metals was conducted in 1998.

Four intermediate wells were sampled for VOCs. Prior to sampling, VOCs were found in two wells, but after the latest round only one well, 29WW16, had high VOC detections. Of the VOCs, MC has the highest concentration at 10,300,000 micrograms per liter ($\mu\text{g/L}$), which is approximately 50% of saturation. Thus, based on this data, the plume boundary in the intermediate zone is shrinking. **Figure 2-4** shows the plume in the intermediate zone.

Seventeen wells from all three groundwater zones were sampled for metals in October 2008. It was suspected that sampling methodology may have influenced the historic results showing elevated levels of metals. The 2008 results were generally lower than previous results and many of the chemicals were excluded as COCs, as noted on **Tables 2-2** and **2-3**. However, nickel, arsenic and selenium still indicated a risk or hazard, and mercury and chromium were detected at concentrations above their MCLs.

Of the 80 nickel samples collected since 1993, nickel was detected above the groundwater MSC for industrial use (GW-Ind) of 2,000 µg/L in only 3 samples. Prior to 2008, the nickel concentration in only one well had an associated HQ greater than 1 (8,400 µg/L at 29WW11 in April 1995). The 2008 result from this well had a concentration of 40 µg/L. In 2008, the highest nickel concentration was found at 29WW07 with 3,190 µg/L and would have an HQ greater than 1.0. Previous results for 29WW07 were less than 40 µg/L in May 1995 and 600 µg/L in July 1998. Thus, high nickel concentrations in individual wells have not been repeatable or consistently detected. The isolated high nickel concentrations at 29WW07 and 29WW11 coincided with elevated chromium concentrations (i.e., above the MCL of 100 µg/L for chromium), indicating that corrosion of the stainless steel well material is a likely source of the high nickel concentrations. The extent of nickel in groundwater will be assessed site-wide during remedial design.

Of the 80 arsenic samples collected since 1993, arsenic was detected above the MCL of 10 µg/L in only 7 samples. Four of the elevated results (115, 29WW16, 29WW20, and 29WW25) were obtained in 1998 or before. It was suspected that the elevated concentrations could be a result of sampling methodology and/or turbid samples. In 2008, nineteen additional samples were collected including the two wells with the highest historic concentrations (59 µg/L at shallow well 29WW25 and 44 µg/L at intermediate well 29WW16). The wells were redeveloped prior to sampling. In 2008, only 3 samples (116, 29WW08, and 29WW25) had arsenic concentrations above the MCL. The well with the highest concentration (29WW25) had high turbidity (237.1 nephelometric turbidity units) and was noted to be reddish brown. This sample result is questionable due to the high turbidity. The next highest sample (116) was qualified as an estimated value since the field duplicate relative percent difference criteria was exceeded. It should also be noted that the aluminum concentration was high at 430 µg/L. This sample result is also questionable due to quality control issues. The third sample from deep well 29WW08 had arsenic concentrations of 40.1 µg/L with a high aluminum concentration of 713 µg/L. The high aluminum concentrations in the same sample indicates that the arsenic may be naturally occurring. Additionally, this deep well is clustered with a shallow well, 29WW07, and intermediate well, 29WW14, neither of which has had an arsenic detection. Thus, the contamination is not from vertical migration. The extent of arsenic in groundwater will be assessed site-wide during remedial design.

Of the 80 selenium samples collected since 1993, selenium was only detected above the MCL of 50 µg/L in one shallow zone well, 118. The selenium concentrations have fluctuated over the years. The most recent concentration has an associated adjusted HQ of 0.15. Therefore, selenium is not considered a COC.

Of the 80 mercury samples collected since 1993, mercury has been detected only twice, both in shallow zone Well 118. The latest round from 2008 detected mercury at 6.1 µg/L in Well 118 –

higher than the previous result of 3 µg/L in 1993. The MCL for mercury is 2 µg/L. In 1995 and 1998, mercury was not detected (less than detection limit of 0.2 µg/L) in Well 118. Mercury is not detected in any other well, and the detections are intermittent and appear to be isolated. Well 118 is located along the southern edge of the site, away from active industrial areas that are possible sources. Mercury was detected at low concentrations in three soil samples (29SB04, 29SB12 and 29SB55) and one sediment sample (29SD13), but all of these locations are more than 1,500 feet from Well 118. Sample results from wells located between the soil sample locations and Well 118 did not detect mercury. Soil and sediment samples near Well 118 (29SD08, 29SD09, 29SB71, and 29SB72) did not show any detectable mercury, so the mercury in groundwater is not related to the mercury in soil. Additionally, the Final Baseline Human Health and Screening Ecological Risk Assessment for Group 2 Sites (Jacobs, 2002) calculated a HI of 0.098 for mercury in groundwater using the maximum mercury value of 3 µg/L. Adjusting this HI for the new higher maximum of 6.1 µg/L gives an HI of 0.20, still less than 1.0. The extent of mercury in groundwater will be assessed site-wide during remedial design.

Of the 84 chromium samples collected through January 2009, chromium has been detected several times. However, the higher concentrations that exceed the MCL are less frequent and are typically not reproducible in a well. Some of the wells sampled in 2008 with concentrations greater than the MCL were cloudy, murky or reddish/brown and four of these wells were resampled in January 2009. Of the four wells sampled, only one had a chromium concentration above the MCL. The wells at LHAAP-29 are stainless steel with stainless well screens. At three other LHAAP sites (LHAAP-12, LHAAP-49, and LHAAP-53) where chromium concentrations had isolated occurrences above the MCL, a collocated polyvinyl chloride (PVC) well was installed. In most cases, chromium concentrations in the PVC well were much lower and below MCLs. The isolated chromium concentrations above the MCL are not indicative of wide-spread contamination in the groundwater and could be attributable to well materials and sampling methodology. Additionally, no risk was identified from chromium. Thus, chromium is not considered a COC at LHAAP-29.

A sample was collected from the newly installed well, 29WW41, in the upper deep zone and analyzed for VOCs, which were not detected in the sample. Therefore, groundwater in the upper deep zone is not affected by VOCs.

Tables 2-2 and 2-3 have been revised to reflect the new data and adjusted HQs for individual chemicals. **Appendix D** contains the table of the results and analytical data reports from the October 2008, January 2009, and June 2009 sampling events.

The results obtained from the post risk assessment groundwater samples do not alter the risk assessment conclusion that groundwater poses risk. The results do remove some of the potential

COCs listed in the risk assessment and confirm the MC plume is stable. The post risk assessment data was used to determine the COCs as indicated on **Tables 2-2** and **2-3**.

2.3.3 Process Lines

At LHAAP-29 there are red liquor TNT wastewater lines (transite and wooden) and blue cooling water lines with manholes (north and south). It should be noted that the explosives sample results from Phase I and Phase II (29WL01 through 29WL11) were deemed unusable for environmental decision making per USEPA (Jacobs, 2002). Additional investigations were conducted for both lines since the risk assessment (**Appendices A** and **B**).

2.3.3.1 TNT Wastewater Lines

During the Phase I Remedial Investigation, the transite TNT wastewater line was found at 29WL04 and 32WL02 but was not found near 29WL01, 29WL02, and 29WL03. This investigation also noted that the wood stave line was found to be soft and severely weathered. Soil samples (29SB81 through 29SB85) were collected in 2004 along the wastewater line near the wash house sumps to check for contamination possibly leaking from the wooden wastewater line into the surrounding soil (**Appendix A**). In 2006, the transite line was found approximately 5-feet north of the wooden line location and sampled near original locations 29WL01 (2006 sample ID 20WL14), 29WL02 (2006 sample ID 29WL13), and 32WL02 (2006 sample ID 32WL05) (**Appendix B**).

The risk assessment contained soil EPC values for 2,4,6-TNT (190 mg/kg), 2-amino-4,6-DNT (25 mg/kg), and 4-amino-2,6-DNT (16 mg/kg). The other explosives were not detected. In 2006, the sample results for 2,4,6-TNT at 29WL13 was above the EPC. The results of the other two explosives were below their EPCs. For evaluation of the additional data collected in 2004 and 2006, the results were compared to soil MSC for industrial use (SAI-Ind) and GWP-Ind values. There were several explosives detected in the transite wastewater line that were above the GWP-Ind. **Table 2-5** summarizes the solid residue sample results from within the TNT transite wastewater line that are above the GWP-Ind. Only two explosives (2,4,6-TNT and 2,4-DNT) had concentrations above the SAI-Ind in the solid residue from within the pipe. The explosive sample results above the SAI-Ind in the solid residue from within the transite pipe are shaded in **Table 2-5**. The sample locations are shown on **Figure 2-5**.

Samples of soil (29SB81 – 29SB85) were collected near the wooden TNT wastewater line in 2004 and were analyzed for explosives (**Appendix A**). **Table 2-6** lists the detected explosive concentrations in the samples from the soil near the TNT wooden wastewater line. The concentrations were all below their associated EPC. These concentrations were also compared to both the SAI-Ind and GWP-Ind, and no exceedances were found in the soil near the wooden TNT wastewater line. The sample locations are shown on **Figure 2-5**.

2.3.3.2 Cooling Water Lines

LHAAP-29 was constructed with two vitrified clay cooling lines as shown on **Figure 2-5**, referred to as the north and south cooling water lines. These lines are accessible through manholes. Liquid and solid residue from these manholes were sampled in 2004 (**Appendix A**). 1,3,5-trinitrobenzene (TNB); 2,4,6-TNT; 2,4-DNT; 2,6-DNT; 2-amino-4,6-DNT; and 4-amino-2,6-DNT were detected. None of the detected explosives were above the EPCs in the risk assessment. The detected results were also compared to the GWP-Ind. Several explosives were detected above the GWP-Ind in both the north and south cooling lines. The detected concentration of 1,3,5-TNB (0.440 mg/kg) at MH02 was less than the GWP-Ind of 310 mg/kg and is not shown on **Table 2-7**.

Liquid samples were also collected from the cooling water line manholes. The detected explosives in the water in the manholes of both the north and south lines included 1,3,5-TNB, 2,4,6-TNT, 2,4-DNT, 2,6-DNT, 2-amino-4,6-DNT, and 4-amino-2,6-DNT. **Table 2-8** lists the detected liquid samples that were above the GW-Ind. For MH09, there were two sets of samples collected (2004 and 2005). Though some of the results from the 2005 sampling round are lower than the GW-Ind, they have been included in **Table 2-8**. Both the north and south cooling lines have sample results that indicate the liquid within the cooling water lines was above the GW-Ind.

2.4 Media Contamination Assessment

Chemicals in the soil and groundwater at LHAAP-29 pose an unacceptable risk to human health. Chemicals in soil may also have the potential to leach into groundwater, or have an unacceptable risk to ecological receptors. Evaluation of data generated after the risk assessment did not identify any additional COCs with risks exceeding the USEPA target risk level of 1×10^{-4} or an HQ greater than 0.1 as shown on **Table 2-1**, **Table 2-2**, and **Table 2-3**.

2.4.1 Soil

Based on the human health risk assessment, soil at LHAAP-29 poses an unacceptable non-carcinogenic hazard to a hypothetical future maintenance worker at LHAAP under an industrial scenario.

Soil contaminants identified as having an HQ greater than 0.1 in the risk assessment are listed in **Table 2-1**. From the additional investigation, 2,4-DNT was detected at higher concentrations than the EPC and resulted in an HQ greater than 1. Soil contaminants identified as posing ecological risks are listed in **Table 2-4**. The emerging contaminant, perchlorate, was detected at concentrations higher than the GWP-Ind. Thus, the COCs and COPECs for the LHAAP-29 soil are three explosives (2,4,6-TNT, 2,4-DNT and 2,6-DNT) and perchlorate.

Soil contamination from explosives that pose human health risks (2,4,6-TNT and 2,4-DNT) at LHAAP-29 is shown on **Figure 2-1**. The area around 29SD46 is the only area to pose human

health risks and has rough rectangular dimensions of 120 feet by 20 feet to a depth of 1 foot for a total volume of 90 cubic yards (cy).

The one perchlorate exceedance of the GWP-Ind is also plotted on **Figure 2-1** so that the correlation between perchlorate in soil and groundwater can be seen. The perchlorate area has rough dimensions of a 100 foot diameter circle around location 29SB86 to a depth of 10 feet for a total volume of 2,900 cy.

Soil contamination from three explosives that pose ecological risks (2,4,6-TNT, 2,4-DNT and 2,6-DNT) are shown on **Figure 2-1**. In addition to the area around location 29SD46, the following areas exceed the EcoPRGs:

- 60-foot diameter circular area around 29SB08 (Building 802-A)
- Stained soil area around Building 806-D (sample location 29DLineWHW01) and Building 806-A
- 150 foot by 20 foot area around locations 29SD13, 29SB15, and GPS-12 (cooling water ditch north of Avenue D)

The rough volume for these areas is 200 cy around 29SB08, 30 cy around 29DLineWHW01, and 440 cy around 29SD13, 29SB15, and GPS-12 for a total of 670 cy.

2.4.2 Groundwater

Based on the human health risk assessment, groundwater at LHAAP-29 poses an unacceptable carcinogenic risk and non-carcinogenic hazard to a hypothetical future maintenance worker at LHAAP under an industrial scenario.

Groundwater contaminants identified to have a risk greater than 1×10^{-6} are listed in **Table 2-2**. The COCs listed in **Table 2-2** for the LHAAP-29 groundwater are MC, 1,2-DCA, 2,4-DNT, 2,6-DNT, and TCE, due to their contribution to risk or exceedance of their respective MCLs. Other contaminants listed on **Table 2-2** are not considered COCs since the EPC or more recent data indicates lower concentrations that are below their MCL.

Groundwater contaminants with a HQ greater than 0.1 are listed in **Table 2-3**. Many detected chemicals have an MCL, but did not show unacceptable risk or hazard. For the chemicals without MCLs, the GW-Ind was used for evaluation. The COCs identified in **Table 2-3** for the LHAAP-29 groundwater are MC, perchlorate, 1,2-DCA, 4-nitrotoluene, 2-nitrotoluene, 2,6-DNT, TCE, 3-nitrotoluene, and 2,4-DNT due to the contribution to HI and exceedance of their respective MCLs. Other contaminants listed on **Table 2-3** are not considered COCs for various reasons including more recent data indicating concentrations less than the EPC or the MCL or newer data indicating a reduction in the HQ.

Thus, the COCs for groundwater at LHAAP-29 are three VOCs (MC, 1,2-DCA, and TCE), five explosives (2,4-DNT, 2,6-DNT, 4-nitrotoluene, 2-nitrotoluene, and 3-nitrotoluene), and perchlorate. **Table 2-9** lists these COCs and indicates their most recent maximum concentration in the shallow and intermediate zones. Based on the comparison of the maximum concentration to their associated MCL or GW-Ind, these COCs have been identified to be of concern in the shallow and/or intermediate groundwater zone.

In the shallow zone, VOCs (1,2-DCA and TCE) and perchlorate are COCs with their maximum concentration located at 29WW15. The associated plumes are shown on **Figure 2-2**. The estimated volume of the perchlorate plume is approximately 4 million gallons. The nitrotoluenes are also COCs in the shallow zone and are located near 29WW06 and 116 as shown on **Figure 2-3**. The volume of the nitrotoluene plume is estimated to be approximately 9 million gallons. Three metals, nickel, arsenic and mercury, had sporadic detections above cleanup levels in certain wells and do not define a plume in the groundwater. These metals have been included as COCs.

In the intermediate groundwater zone, the COCs are limited to VOCs (MC, 1,2-DCA, and TCE). The VOC groundwater plume in the intermediate zone has the maximum concentrations at 29WW16 as indicated on **Figure 2-4**. The estimated volume of the VOC plume is approximately 21 million gallons. Groundwater volumes were estimated using a porosity of 25 percent with a thickness ranging from 5 to 10 feet.

As demonstrated by previous sample results and sampling of new monitoring well 29WW41 in June 2009, the deep groundwater zone is not affected at LHAAP-29.

2.4.3 Process Lines

Contaminated explosives residue remains within the transite TNT wastewater line at concentrations above the SAI-Ind and GWP-Ind, but access to the pipe is limited to the inlets and outlets unless the pipe is penetrated. Additionally, the line is deeper than the cleanup depth of 2 feet bgs for nonresidential use. The gravity flow portion of the line is approximately 3,000 linear feet. The pressurized portion of the line is approximately 1,000 linear feet. The line is in good condition.

The wooden TNT wastewater line was flushed and abandoned. The results from soil samples collected near the line indicate there has not been a release to the surrounding soil. Further, the line is deeper than the near-surface soil depth of 2 feet bgs considered for nonresidential use (TAC335.559(g)). Furthermore, it was noted in site documentation that no additional action is necessary for the wooden TNT wastewater line (Bate Stamp 001446).

The north and south vitrified clay cooling water lines are accessible through manholes, and the liquid and solid residue contents from the manholes were sampled. The liquid and solid residues from the manholes are contaminated with explosives at concentrations that are above the GW-Ind (liquid) and the GWP-Ind (solid residue). There are approximately 5,000 feet of pipe in the main lines, approximately 1,680 linear feet of pipe from each production area to the main line, and 12 manholes.

2.5 Conceptual Site Model

Figure 2-6 illustrates the overall conceptual site model for LHAAP-29. The model presents the human health pathways that are complete and being considered for remediation. Those pathways that are likely to be incomplete or have negligible impact are not being considered for remediation as discussed below. The ecological conceptual model for LHAAP-29 (**Figure 2-7**) is similar to the one presented for human health in terms of the origin and fate and transport mechanisms of the contaminants present at the site. However, only exposure pathways and routes associated with soil are relevant for ecological risk assessment.

Explosive compound releases resulting from the manufacturing process of TNT as well as releases from process tanks and process waste pipelines are the suspected contamination sources at LHAAP-29. The remaining potential sources of contamination at the site are the gravity line “red liquor” portions of the co-located wood and transite TNT wastewater pipelines that transported LHAAP-29 process wastes to the former pump house, explosives compounds in stained soils around the foundation of Buildings 806-A and 806-D, isolated perchlorate-containing soils in the northeastern portion of LHAAP-29 at a depth of eight (8) feet bgs, and TNT contaminated sediment in the cooling water outfall ditch at a depth of seven (7) feet bgs. Low-levels of explosives were identified in both the cooling water “blue water” drain line and the “red liquor” TNT wastewater line to be a hazard.

Contamination in the form of explosive compounds, VOCs, and perchlorate is present in groundwater at LHAAP-29 and poses potential risk to the hypothetical future maintenance worker. Explosive compounds in the shallow groundwater at LHAAP-29 are intermittent and dispersed across the site. Perchlorate and VOC concentrations have been detected consistently throughout the shallow groundwater zone. Concentrations of VOCs were detected in the intermediate groundwater zones. The most significant contaminant result is MC in the intermediate zone. The MC concentrations at 29WW16 are at approximately half the solubility, which indicates a potential for the presence of dense non-aqueous phase liquid (DNAPL). In the general vicinity of 29WW16, however, DNAPL has not been encountered. The horizontal extent of contamination in the shallow and intermediate groundwater zones appears to be isolated to a few specific locations as presented in **Figures 2-2, 2-3 and 2-4**.

The soil and groundwater at LHAAP-29 may pose a risk for the hypothetical future maintenance workers. However, no impact to surface water from groundwater was determined (Shaw, 2007c). Thus the only pathways considered for remediation are soil, soil to groundwater, and future industrial groundwater use.

Table 2-1
Chemicals with Hazard Quotient Greater than 0.1 in Soil

Chemical	Baseline Risk Assessment			Data Through 2008			Comparison Level		Retained as COC ?
	Soil Hazard Quotient ^a	EPC (mg/kg)	Soil Sample Location	Adjusted Hazard Quotient ^b	Maximum (mg/kg)	Soil Sample Location	SAI-Ind (mg/kg)	GWP-Ind (mg/kg)	
2,4,6-Trinitrotoluene	0.77	190	29SD13	105	26,000	29SD46	510	5.1	Yes, 2
2-Amino-4,6-dinitrotoluene	0.33	25	29SD13	0.63	48	29SD46	170	1.7	No, 1
4-Amino-2,6-dinitrotoluene	0.21	16	29SD13	0.21	16	29SD13	170	1.7	No, 1
2,4-Dinitrotoluene	0.0053	6.2	29SB15	6.8	8,000	29SD46	4.2	0.042	Yes, 3
Perchlorate ^c	8.1×10^{-5}	0.0703	Max from Table 3-66	0.0099	8.6	29SB86	950	7.2	Yes, 4

Notes and Abbreviations:

1. Not identified as contaminant of concern (COC) because HQ is less than 1.0.
2. Identified as COC because risk assessment HQ is almost 1 and most recent sample concentration is greater than the SAI-Ind GWP-Ind.
3. Identified as COC because EPC is above the SAI-Ind and GWP-Ind values and Hazard Quotient is greater than 1.0.
4. Identified as COC because contaminant is COC in groundwater and exceeds the GWP-Ind.

^a HQ from Baseline Risk Assessment Table C-68 (Jacobs, 2002)

^b calculated HQ based on the most recent maximum concentration.

^c Even though HI < 0.1, listed because recent maximum concentration is greater than EPC

EPC Exposure Point Concentration from Baseline Risk Assessment (Jacobs, 2002)

GWP-Ind Soil medium-specific concentration for industrial use based on groundwater protection

HQ hazard quotient

mg/kg milligrams per kilogram.

SAI-Ind Soil medium-specific concentration for industrial use based on inhalation, ingestion, and dermal contact

Table 2-2
Chemicals Contributing to Carcinogenic Risk in Groundwater

Chemical	Baseline Risk Assessment			Data Since Risk Assessment			Comparison Levels		Retained as COC ?
	Cancer Risk Groundwater ^a	EPC (µg/L)	Well	Maximum (µg/L)	Well	Adjusted Risk	MCL (µg/L)	TCEQ GW-Ind (µg/L)	
Methylene chloride	3.6×10^{-1}	6,600,000	29WW16	10,300,000	29WW16	5.6×10^{-1}	5	5	Yes, 1
1,2-Dichloroethane	2.9×10^{-2}	14,000	29WW15	<12,500	29WW16	--	5	5	Yes, 1
2,4-Dinitrotoluene	1.3×10^{-3}	530	29WW20	50.9 32.4	29WW05 29WW20	1.2×10^{-4}	--	0.42	Yes, 2
2,6-Dinitrotoluene	1.3×10^{-3}	530	29WW20	239 112	116 29WW20	5.9×10^{-4}	--	0.42	Yes, 2
Arsenic	3.1×10^{-4}	59	29WW25	141	29WW25	7.4×10^{-4}	10	10	Yes, 5
Trichloroethene	2.3×10^{-4}	1,200	29WW15	<12,500	29WW16	--	5	5	Yes, 1
2,3,7,8-TCDD	6.1×10^{-5}	1.25×10^{-5}	29WW03	NR	--	--	3.0×10^{-5}	--	No, 4
Chloroform	2.1×10^{-5}	14	29WW21	9.75 ND	29WW15 29WW21	1.5×10^{-5}	80 ^b	1,000	No, 4

Notes and Abbreviations:

1. Identified as COC because most recent maximum concentration is above the MCL.
2. Identified as COC because carcinogenic risk is $>10^{-4}$.
3. Excluded because detections are isolated.
4. Excluded because EPC is below the MCL.
5. Identified as a COC subject to further verification.

^a From Baseline Risk Assessment Table C-71 (Jacobs, 2002)

^b MCL for total trihalomethanes was used for chloroform.

µg/L micrograms per liter

COC contaminant of concern

EPC exposure point concentration

MCL Safe Drinking Water Act maximum contaminant level

MSC medium specific concentration from Updated Examples of Risk Reduction Standard No. 2, Appendix II

NR not resampled for this constituent since Baseline Risk Assessment

TCEQ GW-Ind Texas Commission of Environmental Quality Groundwater MSC for Industrial Use

Table 2-3
Chemicals with Hazard Quotient Greater than 0.1 in Groundwater

Chemical	Baseline Risk Assessment			Data Since Risk Assessment			Comparison Levels		Retained as COC ?
	Hazard Quotient Groundwater ^a	EPC ^a (µg/L)	Well	Maximum (µg/L)	Well	Adjusted Hazard Quotient	MCL (µg/L)	TCEQ GW-Ind (µg/L)	
Methylene chloride	1500	6,600,000	29WW16	7,110,000	29WW16	1600	5		Yes, 1
Perchlorate	960	88,000	29WW15	16,800	29WW15	180		72	Yes, 2
1,2-Dichloroethane	490	14,000	29WW15	5,520	29WW15	190	5		Yes, 1
4-Nitrotoluene (p-)	35	2,100	29WW20	1,400 374	116 29WW20	23		1,000	Yes, 2
Chloroform	8.0	14	29WW21	9.75 ND	29WW15 29WW21	5.6	80 ^b		No, 3
2-Nitrotoluene (o-)	7.3	4,400	116	8,140	116	14		1,000	Yes, 2
2,6-Dinitrotoluene	5.2	530	29WW20	239 112	116 29WW20	2.3		0.42	Yes, 2
Trichloroethene	4.6	1,200	29WW15	344	29WW15	1.3	5		Yes, 1
Nickel	4.1	8,400	29WW11	3,190 40	29WW07 29WW11	1.6 <0.1		2,000	Yes, 9
3-Nitrotoluene (m-)	4.0	240	29WW05	451 123	116 29WW05	7.5		1,000	Yes, 2
2,4-Dinitrotoluene	2.6	530	29WW20	50.9 32.4	29WW05 29WW20	0.33		0.42	Yes, 5
Arsenic	1.9	59	29WW25	141	29WW25	4.5	10		Yes, 9
Aluminum	1.3	130,000	115	713	29WW08 ^c	<0.1		100,000	No, 6
Antimony	1.3	52	29WW09	1.45	29WW08	<0.1	6		No, 7
Barium	0.91	6,500	116	1,100 48.5 J	115 116	0.15 <0.1	2,000		No, 6
Selenium	0.68	350	118	75.3	118	0.15	50		No, 4
Manganese	0.50	2,410	115	1,310	114 ^c	0.27		14,000	No, 8
Vanadium	0.50	360	115	7.5 J	29WW04 ^c	<0.1		720	No, 8
Thallium	0.37	3.0	29WW03	0.339 J	29WW25 ^c	<0.1	2		No, 7
2-Amino-4,6-dinitrotoluene	0.35	5.9	29WW05	ND	29WW05	-		17	No, 8
4-Amino-2,6-dinitrotoluene	0.35	5.9	29WW05	16.3	29WW05	0.97		17	No, 8
Strontium	0.31	19,000	119	NR	-	-		61,000	No, 8
Silver	0.16	80	29WW09	ND	All wells resampled ^c	-		510	No, 8
Cadmium	0.12	6.23	119	1.2 1.12	115 116	<0.1 <0.1	5		No, 6

Table 2-3 (continued)
Chemicals with Hazard Quotient Greater than 0.1 in Groundwater

Notes and Abbreviations:

1. Identified as COC because EPC is above the MCL
 2. Identified as COC because HQ is > 1.0
 3. Excluded because EPC is below the MCL
 4. Excluded as COC because elevated concentrations are isolated. See Section 2.3.2 for further explanation
 5. Already identified as a COC due to carcinogenic risk (**Table 2-2**)
 6. More recent sample results indicate lower concentrations of chemical, reducing HQ to <1.0
 7. More recent sample results indicate lower concentrations of chemical below the MCL
 8. Excluded because EPC and/or most recent maximum is below the TCEQ GW-Ind MSC and HQ is <1.0
 9. Identified as a COC subject to further verification.
- ^a From Baseline Risk Assessment Table C-68 (Jacobs, 2002)
- ^b MCL for total trihalomethanes was used for chloroform
- ^c Well with maximum in Baseline Risk Assessment was dry in most recent sampling event and the identified well has the most recent maximum
- | | |
|-------------|---|
| COC | contaminant of concern |
| EPC | exposure point concentration |
| HQ | hazard quotient |
| MSC | medium specific concentration from Updated Examples of Risk Reduction Standard No. 2, Appendix II |
| TCEQ GW-Ind | Texas Commission of Environmental Quality Groundwater MSC for Industrial Use |
| MCL | Safe Drinking Water Act maximum contaminant level |
| NR | chemical not resampled in most recent sampling event |
| µg/L | micrograms per liter |

Table 2-4
Chemicals in Soil Compared to EcoPRGs

Chemical	SS EcoPRG ^a (mg/kg)	TS EcoPRG ^a (mg/kg)	Maximum ^b (mg/kg)	Retained as Contaminant of Potential Ecological Concern?
2,4,6-Trinitrotoluene	6.1	4.7	26,000	Yes
2,4-Dinitrotoluene	—	12	8,000	Yes
2,6-Dinitrotoluene	2.7	6.8	15	Yes

Notes and Abbreviations:

^a From Baseline Ecological Risk Assessment Table 16-1 (Shaw, 2007b).

^b Maximum soil concentrations from samples collected in the upper 3 feet of soil at 29SD46 collected (Shaw, 2007a)

EcoPRG Ecological Preliminary Cleanup level

mg/kg milligrams per kilogram.

SS surface soil from 0-0.5 feet (applicable to deer mouse)

TS total soil from 0-3 feet (applicable to short-tailed shrew)

Table 2-5
Summary of Solid Residue Sample Results from Transite TNT Wastewater Line

Explosive	EPC from Risk Assessment (mg/kg)	SAI-Ind (mg/kg)	GWP-Ind (mg/kg)	Concentration* (mg/kg)	Sample Location
2,4,6 TNT	190 (associated HI of 0.77)	510	5.1	526 58.4 17 JL	29WL13 29WL14 32WL05
2,4 DNT	--	4.2	0.042	5.15 JL 89 7.21	32WL05 29WL13 29WL14
2-amino-4,6-DNT	25 (associated HI of 0.33)	170	1.7	19 JH	29WL14
4-amino-2,6-DNT	16 (associated HI of 0.21)	170	1.7	13.3	29WL14
1,3-DNB	--	100	1	1.08	29WL13

Notes and Abbreviations:

* Concentrations included in table are above the GWP-Ind. Shaded concentrations are also above the SAI-Ind.

DNB dinitrobenzene

DNT dinitrotoluene

EPC exposure point concentration

GWP-Ind soil MSC for industrial use based on groundwater protection

HI hazard index

JL concentration is estimated and biased low

JH concentration is estimated and biased high

mg/kg milligrams per kilogram

MSC medium-specific concentration

SAI-Ind soil MSC for industrial use based on inhalation, ingestion and dermal contact

TNT trinitrotoluene

Table 2-6
Explosive Compounds Detected in Soil Samples
near Wooden TNT Wastewater Line

Explosive	EPC from Risk Assessment (mg/kg)	SAI-Ind (mg/kg)	GWP-Ind (mg/kg)	Concentration (mg/kg)	Sample Location	Associated Depth
2,4,6-TNT	190 (associated HI of 0.77)	510	5.1	0.43	29SB83	4-5 ft bgs
2-amino-4,6-DNT	25 (associated HI of 0.33)	170	1.7	0.23 J 0.9	29SB85 29SB85	4-5 ft bgs 8-9 ft bgs
4-amino-2,6-DNT	16 (associated HI of 0.21)	170	1.7	0.30 J	29SB85	8-9 ft bgs

Abbreviations:

DNT	dinitrotoluene
EPC	exposure point concentration
ft bgs	feet below ground surface
GWP-Ind	soil MSC for industrial use based on groundwater protection
HI	hazard index
J	concentration is estimated
mg/kg	milligrams per kilogram
MSC	medium-specific concentration
SAI-Ind	soil MSC for industrial use based on inhalation, ingestion and dermal contact
TNT	trinitrotoluene

Table 2-7
Summary of Solid Residue Sample Results from Cooling Water Lines

Explosive	EPC from Risk Assessment (mg/kg)	GWP-Ind (mg/kg)	Concentration* (mg/kg)	Sample location	Associated line
2,4,6-TNT	190 (associated HI of 0.77)	5.1	11 7 5.5	MH02 MH10 MH08	S Cooling N Cooling N Cooling
2,4-DNT	--	0.042	0.71 1.1	MH08 MH10	N Cooling N Cooling
2,6-DNT	--	0.042	0.24 J 0.30 J	MH10 MH08	N Cooling N Cooling
2-amino-4,6-DNT	25 (associated HI of 0.33)	1.7	3.8 J 2.4 J 9	MH02 MH09 MH10	S Cooling N Cooling N Cooling
4-amino-2,6-DNT	16 (associated HI of 0.21)	1.7	2.6 J 2.5 J 7.8	MH02 MH09 MH10	S Cooling N Cooling N Cooling

Notes and Abbreviations:

* Concentrations included in table are above the GWP-Ind.

DNT	dinitrotoluene
EPC	exposure point concentration
GWP-Ind	soil MSC for industrial use based on groundwater protection
HI	hazard index
J	concentration is estimated
mg/kg	milligrams per kilogram
MSC	medium-specific concentration
TNT	trinitrotoluene

Table 2-8
Explosive Compounds Detected in Liquid Samples from Cooling Water Lines

Explosive	EPC from Risk Assessment (µg/l)	GW-Ind (µg/l)	Concentration (µg/l)	Sample location	Associated line
2,4,6-TNT	--	51	250	MH01	South
			84.3 JL	MH05	South
			430	MH06	South
			5200	MH09 (12/04)	North
			20	MH09 (2/05)	North
2,4-DNT	530 (HI=2.6)	0.42	15	MH01	South
			0.8 J	MH09 (12/04)	North
			1.13	MH09 (2/05)	North
			1.05	MH10	North
			0.922 J	MH11	North
			0.934 J	MH12	North
2,6-DNT	530 (HI=5.2)	0.42	4.1	MH01	South
			27	MH09 (12/04)	North
			1.27	MH09 (2/05)	North
			1.35	MH10	North
			1.15	MH11	North
			1.31	MH12	North
2-amino-4,6-DNT	5.9 (HI=0.35)	17	220	MH09 (12/04)	North
			1.68	MH09 (2/05)	North
4-amino-2,6-DNT	5.9 (HI=0.35)	17	33	MH01	South
			290	MH09 (12/04)	North
			2.42	MH09 (2/05)	North

Abbreviations:

DNT dinitrotoluene
 EPC exposure point concentration
 GW-Ind groundwater MSC for industrial use
 HI hazard index
 J concentration is estimated
 JL concentration is estimated and biased low
 MSC medium-specific concentration
 TNB trinitrobenzene
 TNT trinitrotoluene

Table 2-9
COCs by Groundwater Zone

COCs	MCL (µg/L)	Shallow Zone			Intermediate Zone		
		Max (µg/L)	Well ID of Max	COC?	Max (µg/L)	Well ID of Max	COC?
Methylene Chloride	5	3	29WW15	No	7,110,000	29WW16	Yes
1,2-Dichloroethane	5	5,520	29WW15	Yes	14.3	29WW16	Yes
Trichloroethene	5	344	29WW15	Yes	4,340	29WW16	Yes
Arsenic	10	141	29WW25	Yes	44	29WW16	Yes
Mercury	2	6.1	118	Yes	not detected	--	No
	GW-Ind (µg/L)						
2,4-Dinitrotoluene	0.42	50.9	29WW05	Yes	not detected	--	No
2,6-Dinitrotoluene	0.42	239	116	Yes	not detected	--	No
2-Nitrotoluene	1,000	8,140	116	Yes	not detected	--	No
3-Nitrotoluene	1,000	451	116	Yes ¹	not detected	--	No
4-Nitrotoluene	1,000	1,400	116	Yes	not detected	--	No
Perchlorate	72	16,800	29WW15	Yes	21.5	29WW35	No
Nickel	2,000	8,400	29WW11	Yes	120	29WW24	No

Notes and Abbreviations:

Max is the maximum concentration of that COC from the most recent sample round.

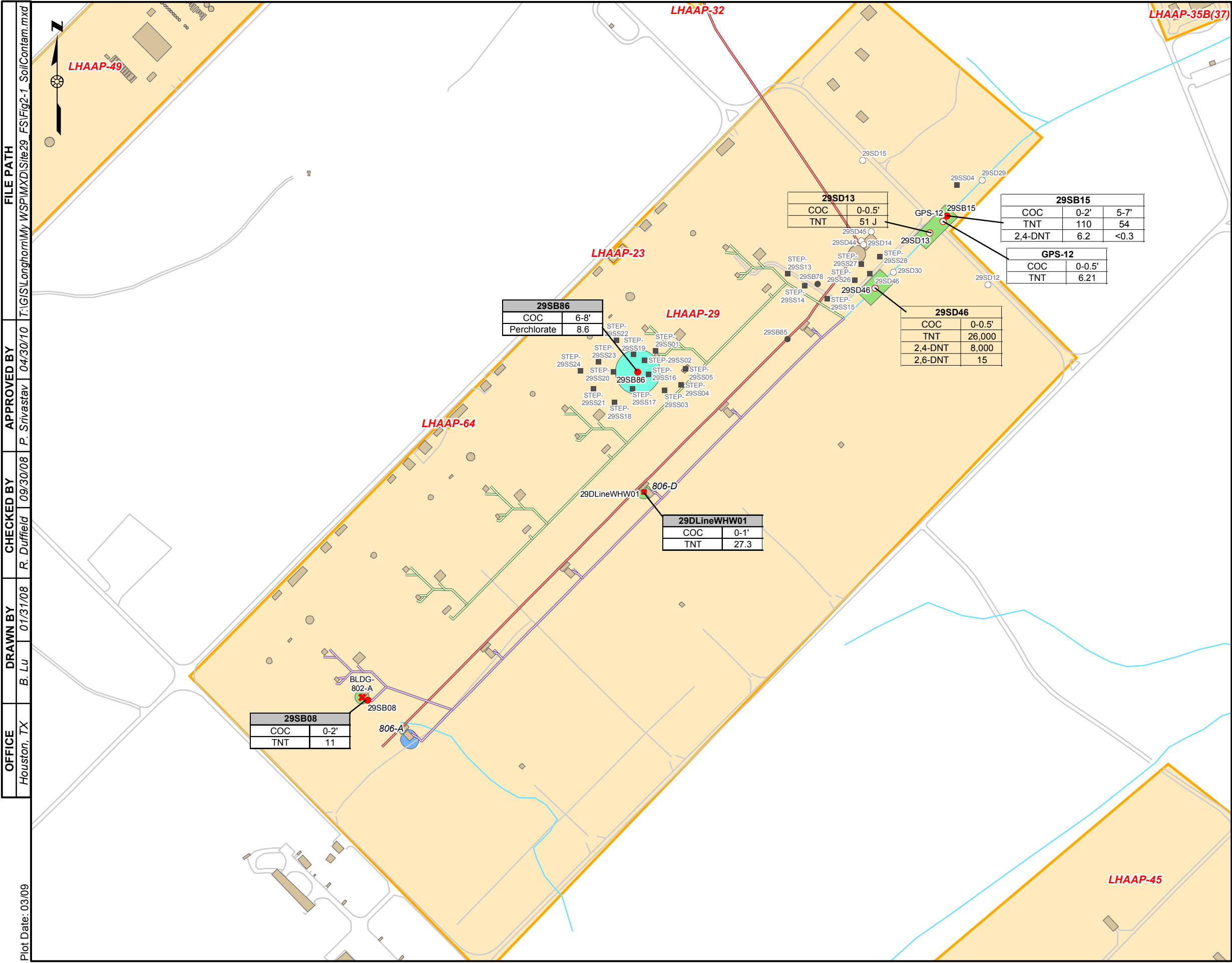
¹ Identified as a COC because hazard quotient value >1.

COC contaminant of concern

GW-Ind Texas Commission on Environmental Quality groundwater medium specific concentration for industrial use

MCL Safe Drinking Water Act maximum contaminant level

µg/L micrograms per liter



LEGEND

Soil Contamination

- ✖ Former Building
- Soil Boring
- Sediment
- Surface Soil

Sample Locations

- Surface Soil
- Soil Boring
- Sediment

Former Building or Concrete Slab

Site

TNT Cooling Water Drain Line (South)

TNT Cooling Water Drain Line (North)

TNT Wastewater Line

Stream

Road

Locations of Excavations

see Section 2.4.1 for estimated excavation areas and volumes

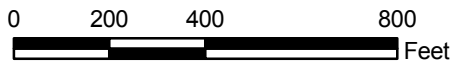
Explosive

Perchlorate

Stained Soil (Plexus)

NOTES:

1. Depths are reported in feet below ground surface.
2. Soil sample concentrations in milligrams per kilogram (mg/kg).
3. All COC concentrations shown on this figure exceed their applicable cleanup levels.
4. TNT - Trinitrotoluene
5. DNT - Dinitrotoluene
6. COC - Contaminant of concern

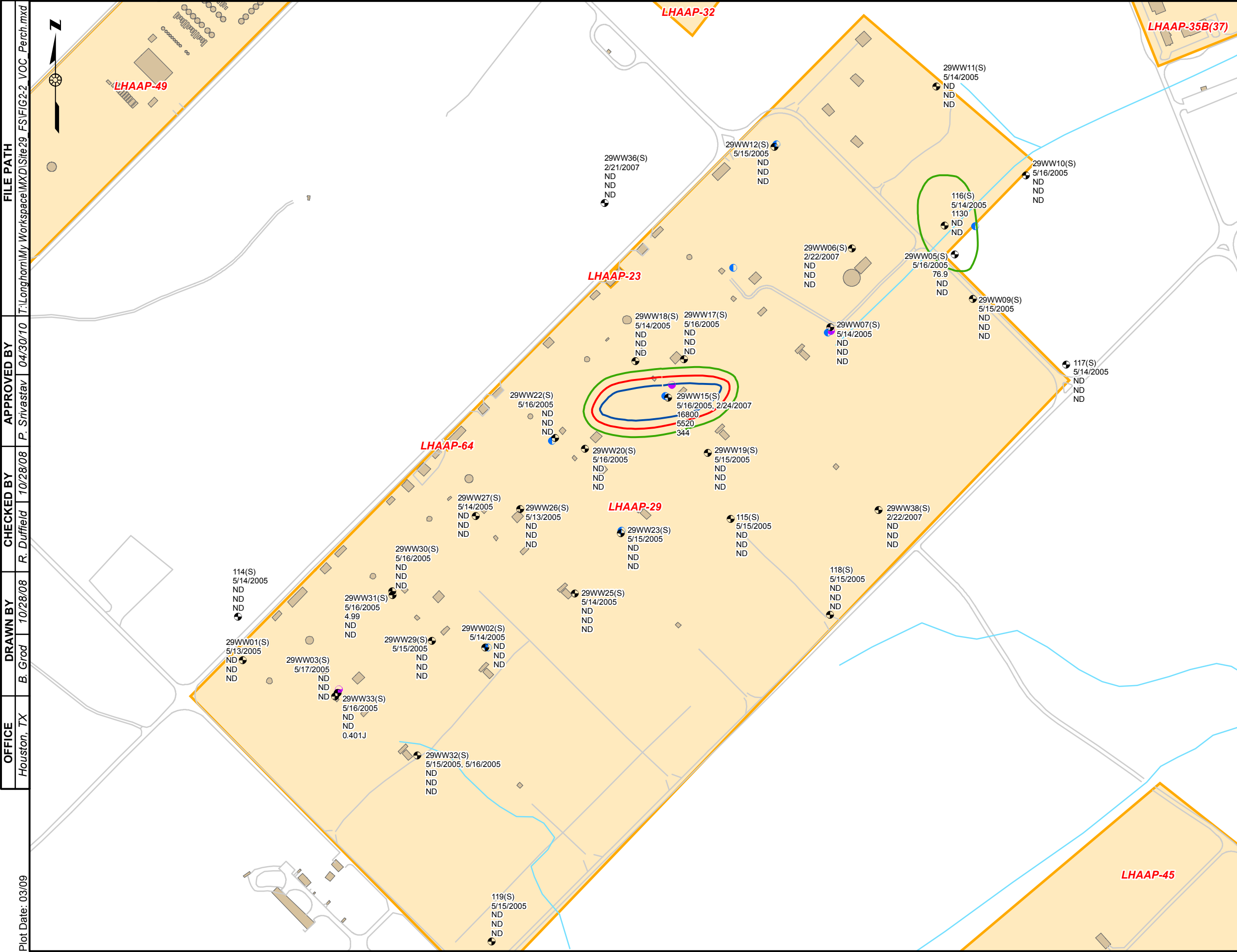


U.S. ARMY CORPS OF ENGINEERS
TULSA DISTRICT
TULSA, OKLAHOMA

FIGURE 2-1

SOIL CONTAMINATION
LHAAP-29 FEASIBILITY STUDY

LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS

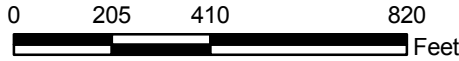


LEGEND

- Shallow Groundwater Monitoring Well (S)
- Intermediate Groundwater Monitoring Well (I)
- Deep Groundwater Monitoring Well (D)
- Perchlorate Plume in Shallow Groundwater Zone (GW-Ind = 72 µg/L)
- 1,2-Dichloroethane Plume in Shallow Groundwater Zone (MCL= 5 µg/L)
- Trichloroethene Plume in Shallow Groundwater Zone (MCL= 5 µg/L)
- Stream
- Road
- Former Building or Tank Location
- Site

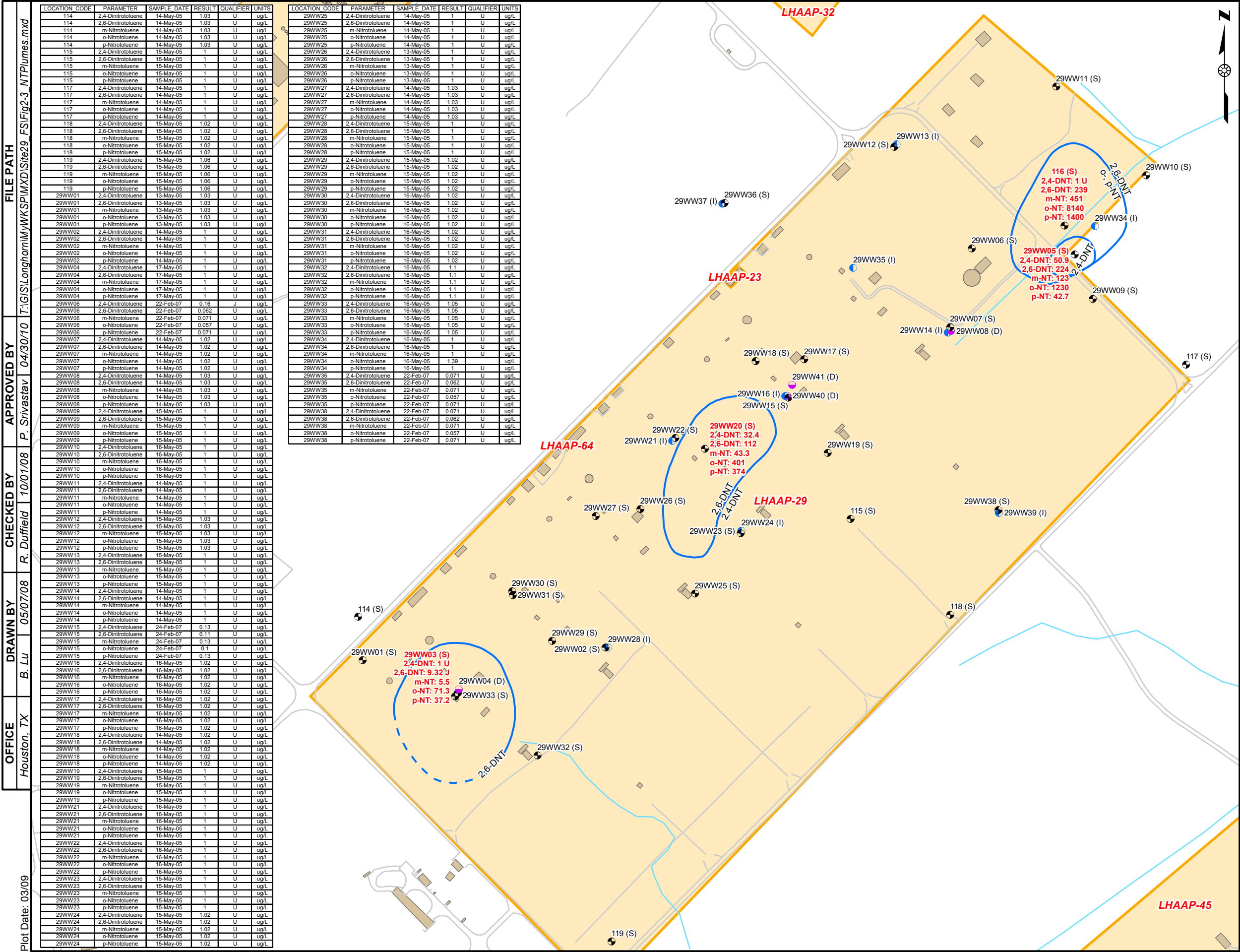
Notes:

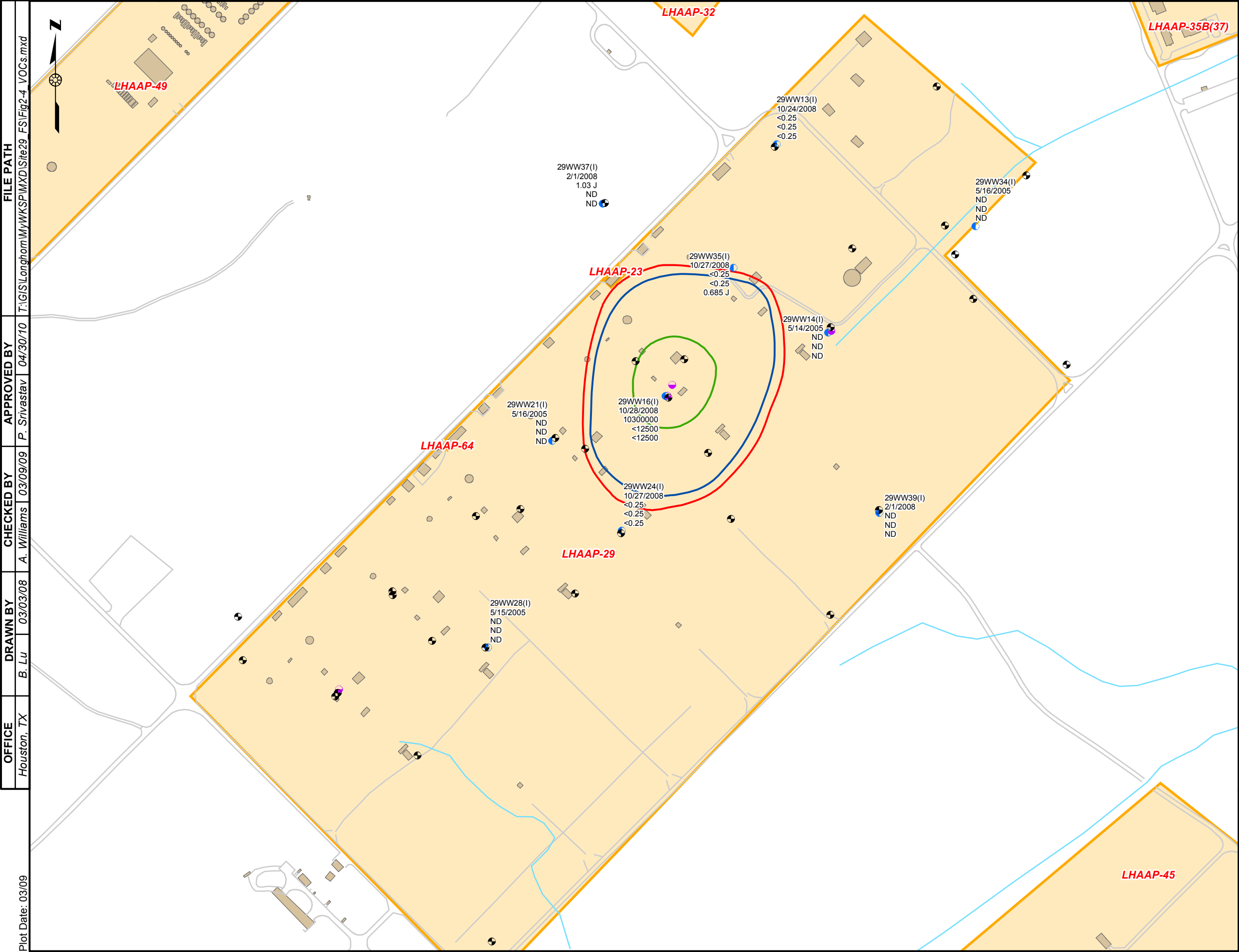
- All concentrations in the intermediate and deep zones are below the GW-Ind, therefore, no plume exists at these intervals.
- All concentrations are reported in micrograms per liter (µg/L).
- ND - non detect.
- TCEQ GW-Ind - groundwater MSC for industrial use.
- MCL = Maximum Contaminant Level.
- Results listed in this order;
Perchlorate
1,2-Dichloroethane
Trichloroethene



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FIGURE 2-2
VOCs AND PERCHLORATE
IN SHALLOW GROUNDWATER
LHAAP-29 FEASIBILITY STUDY
LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS



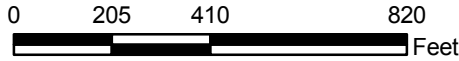


LEGEND

- Shallow Groundwater Monitoring Well (S)
- Intermediate Groundwater Monitoring Well (I)
- Deep Groundwater Monitoring Well (D)
- Methylene Chloride Plume in Intermediate Groundwater Zone (MCL = 5 µg/L)
- 1,2-Dichloroethane Plume in Intermediate Groundwater Zone (MCL = 5 µg/L)
- Trichloroethene Plume in Intermediate Groundwater Zone (MCL = 5 µg/L)
- Stream
- Road
- Former Building or Tank Location
- Site

Notes:

- All concentrations are reported in micrograms per liter (µg/L).
- Results listed in this order;
Methylene Chloride
1,2-Dichloroethane
Trichloroethene
- ND - non detect.
- MCL - maximum contaminant level.
- Due to historic results and the high detection limits at 29WW16, it has been assumed that concentrations of 1,2-dichloroethane and trichloroethene still exceed their MCLs.



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TULSA, OKLAHOMA

FIGURE 2-4
VOCs IN INTERMEDIATE GROUNDWATER
LHAAP-29 FEASIBILITY STUDY
LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS

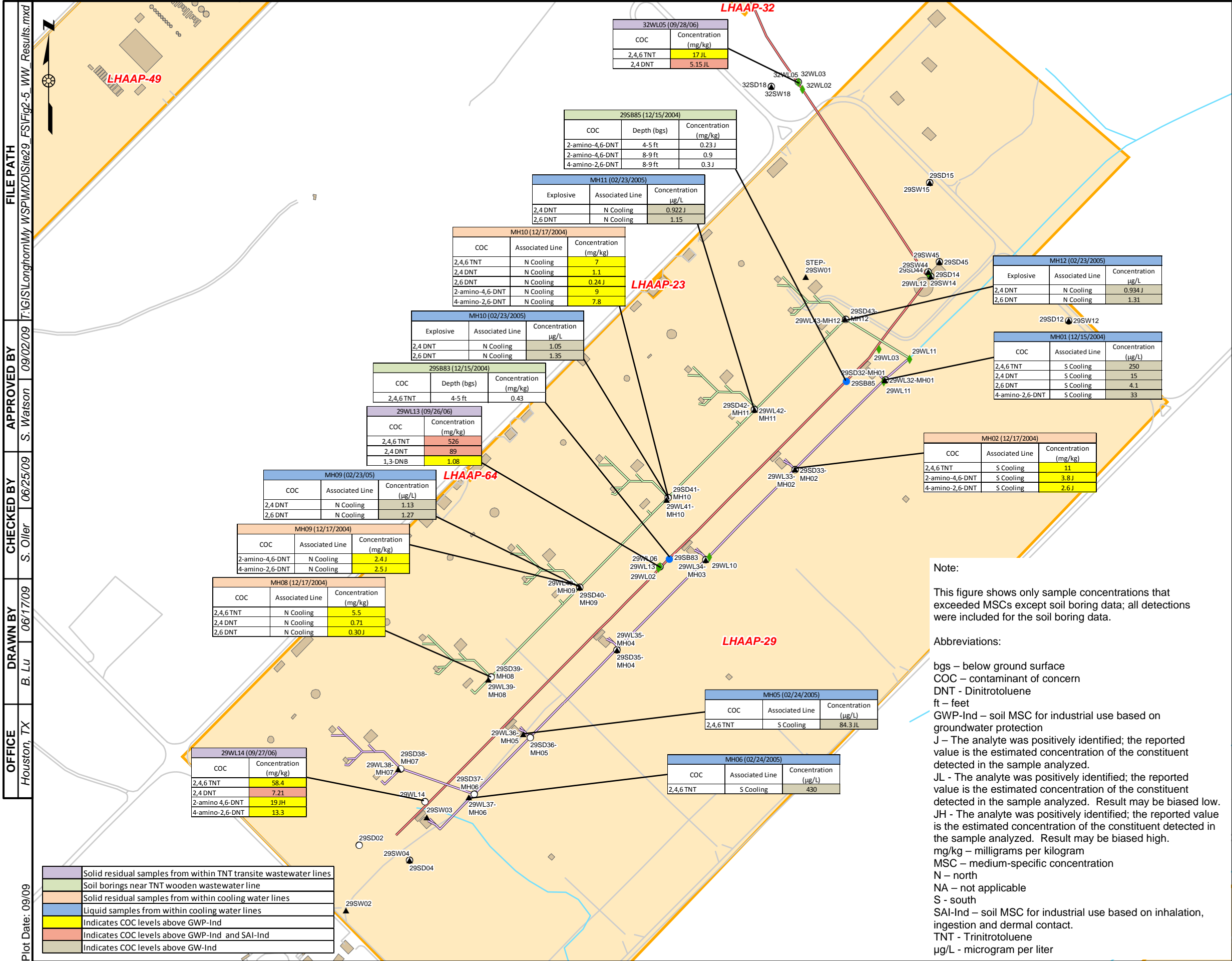
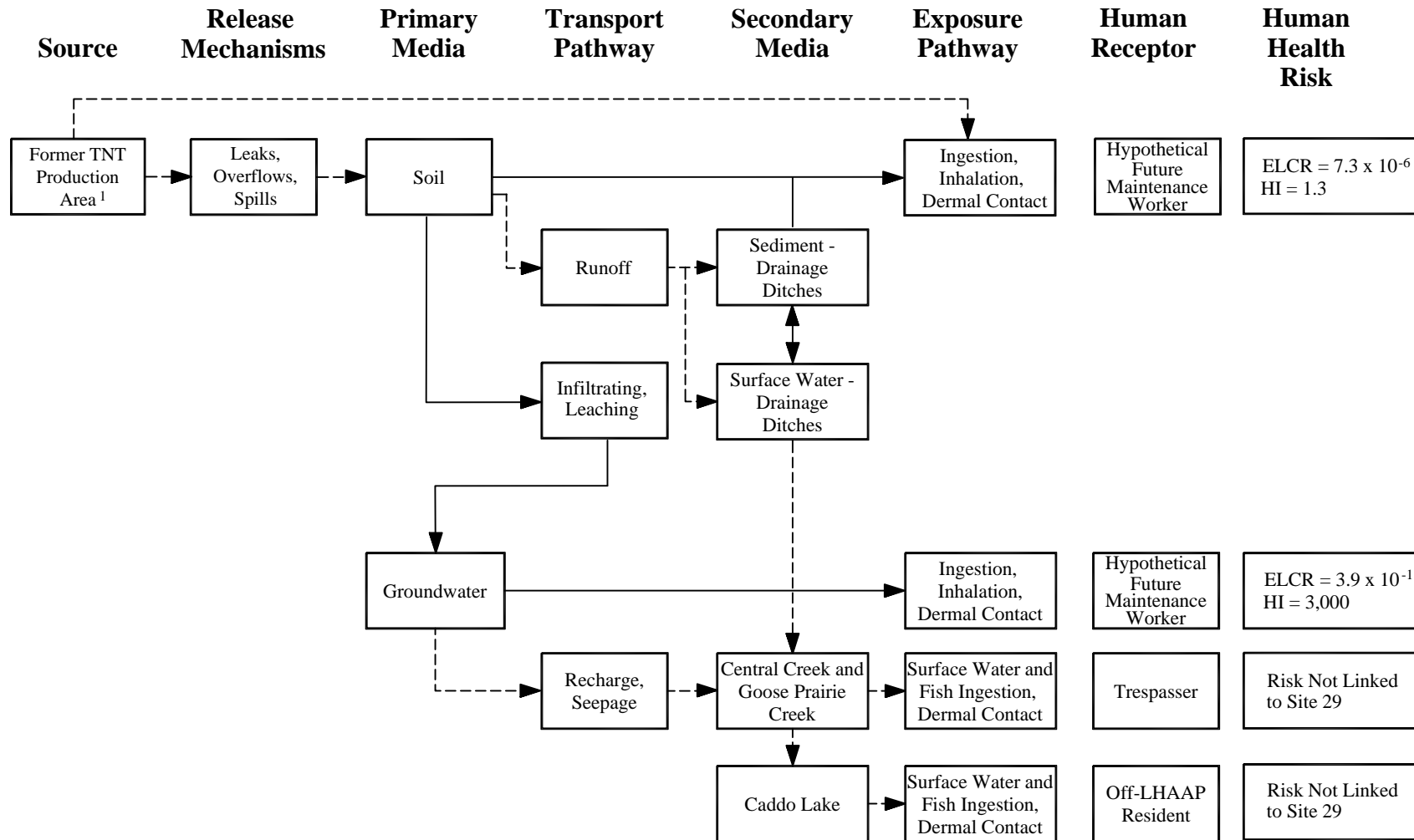


IMAGE ---	X-REF ---	OFFICE STOUGHTON, MA	DRAWN BY D. CRISPO	CHECKED BY S. WATSON	APPROVED BY P. SRIVASTAV	DRAWING NUMBER 117591-A42
			08/29/07	03/09/09	03/10/09	

00091177



Notes:

1. Most above ground structures have been removed
2. ELCR - Estimated Life-time Cancer Risk
3. HI - Hazard Index
4. ELCR and HI values are from risk assessment (Jacobs, 2002)



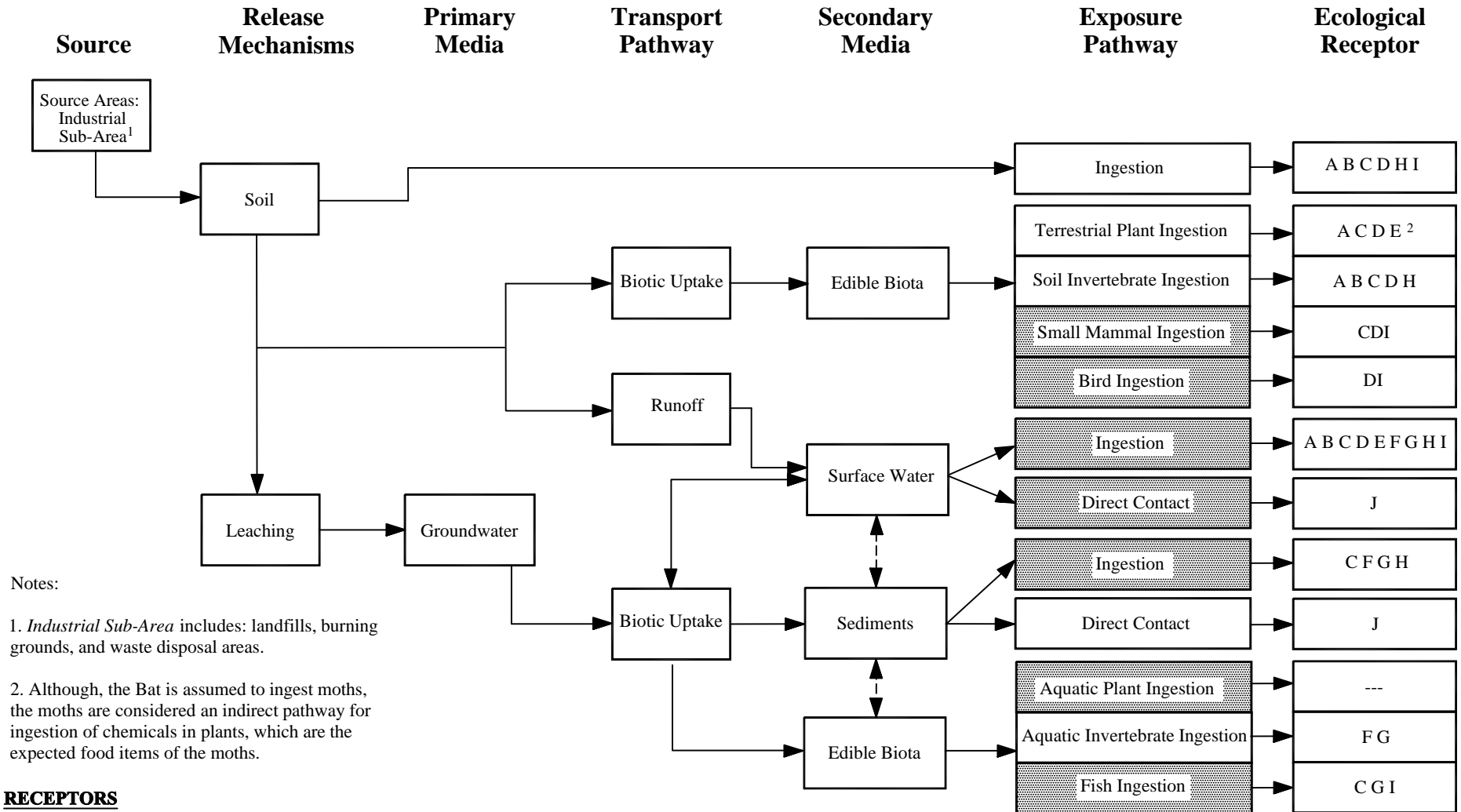
U.S. Army Corps of Engineers
 Tulsa District
 Tulsa, Oklahoma

Figure 2-6
 Human Health Conceptual Site Model
 LHAAP-29 Feasibility Study

Longhorn Army Ammunition Plant
 Karnack, Texas

PLOT DATE: 1/30/06
 FORMAT REVISION 5/13/02

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	STOUGHTON, MA	D. CRISPO 08/29/07	S. WATSON 03/09/09	P. SRIVASTAV 03/09/09	117591-A43



RECEPTORS

- | | |
|---|---|
| A. Deer Mouse | F. Bank Swallow |
| B. Short-Tailed Shrew | G. Belted Kingfisher |
| C. Raccoon (& Raccoon [Louisiana Black Bear]) | H. American Woodcock |
| D. Red Fox | I. Red-Tailed Hawk |
| E. Townsend's Big-Eared Bat | J. Aquatic Life (benthic invertebrates) |

--- = All receptors exposed to this pathway were determined not to be of concern.

Shaded cells indicate pathways that were not identified as significant, are background related, or were refined via site-specific investigations.



U.S. Army Corps of Engineers
 Tulsa District
 Tulsa, Oklahoma

Figure 2-7
 Ecological Conceptual Exposure Model
 LHAAP-29 Feasibility Study
 Longhorn Army Ammunition Plant
 Karnack, Texas

3.0 Remedial Action Objectives and Cleanup Levels

This section identifies the LHAAP-29 RAOs (**Section 3.1**), potential chemical-, location- and action-specific ARARs (**Section 3.2**), and cleanup levels (**Section 3.3**). The RAOs identify the general goals or end points that the remediation will accomplish, while the cleanup levels identify specific cleanup standards for each medium of concern based on risk or ARARs. The cleanup levels may be applied to individual contaminants.

3.1 Remedial Action Objectives

RAOs are established to protect human health and the environment while also meeting ARARs. The identification of RAOs must consider the environmental issues at the site and the receptors that are affected. As identified in the conceptual site models (**Section 2.5**), the primary environmental issues at LHAAP-29 are:

- Groundwater that poses an unacceptable risk or hazard to the hypothetical future maintenance worker from contamination by VOCs (MC, 1,2-DCA, and TCE), perchlorate, and explosives (2,4-DNT, 2,6-DNT, 2-nitrotoluene, 3-nitrotoluene, and 4-nitrotoluene) and has the potential to adversely impact human health.
- Soil near 29SB86 that has concentrations of perchlorate in excess of the TCEQ GWP-Ind concentration and has the potential to be a source of groundwater contamination.
- Surface soil that has concentrations of explosives that pose a risk to ecological receptors (near 29SB08 [Building 802-A], 29DLineWHW01, 29SD13, 29SB15, GPS-12, and the stained soil near Building 806-A) and a hazard to hypothetical future maintenance workers (near 29SD46).
- Buried TNT wastewater lines and cooling water lines/manholes that have residual explosive contaminants remaining in the line. If a hypothetical future maintenance worker came into contact with the residual contamination in the buried lines or in the manholes, it could pose risk. However, contact with the buried lines is unlikely since the lines are at least 3 feet bgs. If water is allowed to gain entrance into these pipes and flow through them to surface water outlets, the residual contamination could be transported out of the pipes. Thus, the primary concerns are direct contact with the residual contamination in the cooling water manholes and the potential transport of contaminants by water that enters the TNT wastewater and cooling water lines.

The future use of the entire LHAAP facility is as a national wildlife refuge. A hypothetical future maintenance worker has been proposed as a conservative human receptor scenario for this land use, and ecological risk is also a concern at LHAAP-29. The U.S. Army recognizes USEPA's policy to return all groundwater to potential beneficial uses, based on the non-binding programmatic expectation in the National Oil and Hazardous Substances Pollution Contingency

Plan (NCP). The RAOs for LHAAP-29, which address contamination associated with the media at the site and take into account the future uses of LHAAP streams, land, and groundwater are:

- Protect the hypothetical future maintenance worker by preventing exposure to the contaminants in the soil, sediment, transite TNT wastewater line, cooling water lines, and groundwater
- Prevent migration of contaminants to groundwater and surface water from potential sources in the soil, sediment and process lines (TNT wastewater and cooling water)
- Protect ecological receptors by preventing exposure to the contaminated soil and sediment
- Return groundwater to its potential beneficial uses, wherever practicable, within a reasonable time period given the particular site circumstances.

3.2 Applicable or Relevant and Appropriate Requirements

The NCP, 40 Code of Federal Regulations (CFR) 300.430(f)(1)(ii)(B) states that on-site remedial actions conducted under CERCLA must attain, or have waived, legally applicable ARARs under federal or more stringent state environmental or facility citing laws identified at the time of the ROD signature. This section provides a preliminary identification and evaluation of potential federal and State of Texas chemical-, location-, and action-specific ARARs for the remediation of LHAAP-29 under CERCLA.

3.2.1 Definitions and Methods

Applicable requirements are those cleanup standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under federal or state law that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site (40 CFR 300.5). A requirement is applicable if all the jurisdictional and site-specific prerequisites of the requirement are met; that is, a requirement is applicable if it directly and fully addresses the situation at the site.

Relevant and appropriate requirements are those substantive environmental protection requirements, criteria, or limitations promulgated under federal or state law that, while not applicable, address problems or situations sufficiently similar to those encountered at the CERCLA site so that their use is well suited to the particular site (40 CFR 300.5). The criteria for determining relevance and appropriateness are listed at 40 CFR 300.400(g)(2). A relevant and appropriate requirement must be complied with to the same extent as an applicable requirement.

To qualify as a state ARAR mandating cleanup standards under 40 CFR 300.400(g)(4) of the NCP, a state requirement must be (1) promulgated (of general applicability and legally

enforceable), (2) an environmental or facility citing law or regulation, (3) substantive (not procedural or administrative), (4) more stringent than a comparable federal requirement, (5) identified by the state in a timely manner, and (6) consistently applied throughout the state. Pursuant to USEPA guidance (USEPA, 1989a), where USEPA has delegated to a state the authority to implement a federal program, the state regulations replace the equivalent federal requirements as the potential ARARs.

ARARs are generally divided into chemical-, location-, and action-specific requirements. Chemical-specific ARARs are usually promulgated health- or risk-based numerical values or methods used to determine acceptable concentrations of chemicals that may be found in, or discharged to, the environment. Location-specific ARARs restrict actions or contaminant concentrations in certain environmentally sensitive areas. Action-specific ARARs are usually technology- or activity-based requirements or limitations on actions taken with respect to hazardous wastes.

An on-site action need not comply with administrative parts of requirements identified as ARARs. According to USEPA guidance (USEPA, 1988a), administrative requirements are mechanisms that facilitate the implementation of the related substantive requirements of a statute or regulation (e.g., approval of or consultation with administrative bodies, documentation, permit issuance, reporting, record keeping, and enforcement).

The NCP at 40 CFR 300.400(e)(1) exempts on-site actions from having to obtain federal, state, or local permits and defines “on-site” as meaning “the aerial extent of contamination and all suitable areas in very close proximity to the contamination necessary for the implementation of the response action.” However, on-site actions must still be in compliance with any substantive permit requirements. Off-site actions must not only comply with requirements that are legally applicable, but they must comply with both the substantive and the administrative parts of those requirements. Permits, if required, must be obtained for all remedial activities conducted off site (40 CFR 300.400[e][2]). Statutory waivers of ARARs (40 CFR 300.430[f][1][ii][C]) may not be used for off-site actions.

The USEPA has noted in its CERCLA guidance that if attainment of a numerical value that is a potential chemical-specific ARAR is impossible because the background level of the chemical subject to CERCLA authority is higher than that of the potential ARAR, the numeric criterion would not be considered an ARAR (USEPA, 1991).

ARARs include only federal or more stringent state environmental laws and regulations and do not include occupational safety regulations. The USEPA requires compliance with the Occupational Safety and Health Administration (OSHA) standards and other worker protection requirements under Section 300.150 of the NCP, not through the ARARs process. Therefore,

none of the promulgated OSHA regulations (e.g., 29 CFR 1926, 29 CFR 1910) are addressed here as ARARs.

In addition to ARARs, 40 CFR 300.400(g)(3) states that federal or state nonpromulgated advisories or guidance may be identified as to-be-considered (TBC) guidance for contaminants, conditions, and/or actions at the site. TBCs include non-promulgated criteria, advisories, guidance, and proposed standards. TBCs are not ARARs because they are neither promulgated nor enforceable. TBCs may be used to interpret ARARs and to determine preliminary cleanup levels when ARARs do not exist for particular contaminants or are not sufficiently protective to develop cleanup levels. TBCs, such as guidance or policy documents, developed to implement regulations may be considered and used where necessary to ensure protectiveness. Potential TBCs evaluated as part of this investigation are listed in **Tables 3-1, 3-2, and 3-3** and are discussed herein.

Chemical-specific requirements are discussed in **Section 3.2.2**; **Table 3-1** includes a narrative listing of chemical-specific ARARs/TBCs for LHAAP-29. Location-specific ARARs/TBCs for the sensitive resources potentially identified at LHAAP are discussed in **Section 3.2.3** and listed in **Table 3-2**. Action-specific ARARs/TBCs are discussed in **Section 3.2.4** and are listed and grouped by component action in **Table 3-3**.

3.2.2 Potential Chemical-Specific ARARs

This section identifies the potential chemical-specific ARARs that apply to surface/subsurface soils groundwater at LHAAP-29. These ARARs are summarized in **Table 3-1**.

3.2.2.1 Potential Chemical-Specific ARARs for Soil

There are no federal promulgated chemical-specific ARARs for soil. The TCEQ Texas Risk Reduction Rules are promulgated state standards for this site. It is anticipated that removal of perchlorate and explosives contaminated soils above the TCEQ GWP-Ind concentrations will prevent contamination of the groundwater at the site.

3.2.2.2 Potential Chemical-Specific ARARs for Air

Proposed remedial action alternatives (other than a “no action” alternative) developed during the FS stage may involve excavation activities that may release fugitive particulate matter into the ambient air. Contaminants emitted into the air during remediation must meet certain chemical-specific requirements for fugitive particulate matter and opacity; because these requirements; however, are triggered by a proposed action, they are addressed as action-specific ARARs in **Section 3.2.4**.

3.2.2.3 *Potential Chemical-Specific ARARs for Surface Water*

Section 121(d)(2) of CERCLA states that every remedial action shall require a level of control which at least attains surface water quality criteria established under Sections 304 or 303 of the Clean Water Act of 1972 (CWA). Therefore, surface water quality criteria are ARARs for surface water cleanup. The considered alternatives in this FS do not address surface water; however, measures will be implemented during construction to prevent off-site migration of contaminants to surface waters.

3.2.2.4 *Potential Chemical-Specific ARARs for Groundwater*

The human health risk assessment (Jacobs, 2002) indicated that the contaminated groundwater at LHAAP-29 presented an unacceptable hazard and risk to a hypothetical future maintenance worker. For the groundwater COCs at LHAAP-29, Safe Drinking Water Act MCLs are available and are considered relevant and appropriate because LHAAP-29 is an NPL site. Thus, MCLs are proposed as the preliminary cleanup levels in this FS for the groundwater at LHAAP-29. If MCLs are not available for certain COCs, MSCs provided under Texas RRR (Title 30 Texas Administrative Code [TAC] 335.551 through 335.569) will be used.

3.2.3 *Potential Location-Specific ARARs*

This section identifies the location-specific ARARs that may apply to LHAAP-29. These ARARs are summarized in **Table 3-2**.

3.2.3.1 *Prehistoric and Historic Archaeological Sites and Paleontological Resources*

In the event that significant archaeological or paleontological resources are discovered during remedial action activities at LHAAP-29, the federal National Historic Preservation Act (16 United States Code [USC] 470 et seq.) and Texas regulations for the protection of archaeological and cultural resources (13 TAC 15 and 13 TAC 25) would provide location-specific ARARs. These ARARs are included in **Table 3-2** to address this contingency. Texas regulations require that such discovered resources be surveyed, designated, and protected in accordance with relevant federal rules, regulations, standards, and guidelines.

Although highly unlikely, in the event that any historic cemeteries are discovered at LHAAP-29, certain provisions of Title 8, Texas Health and Safety Code, Chapters 711–715, may provide location-specific ARARs. For example, if an unknown or abandoned cemetery is discovered, Chapter 711.010 prohibits further construction or activity until the disturbed human remains are removed. Because the existence of cemeteries at LHAAP-29 is highly unlikely, cemetery protection laws are not included as location-specific ARARs in **Table 3-2**. If such resources are discovered during further investigation of these sites, the cemetery protection laws will be re-evaluated as ARARs in future decision documents.

3.2.3.2 *Traditional Resources*

A preliminary survey for significant Native American resources within the boundary of LHAAP has been conducted and indicates the presence of Native American resources on the property. Members of the Caddo Lake Indian Tribe have visited LHAAP, attended meetings, and expressed interest in and concern for the Native American resources on the site. In addition, discussions were held about establishing Native American educational displays covering the historical aspects of LHAAP property. The federal Native American Graves Protection and Repatriation Act (25 USC Section 3001) and its implementing regulations (43 CFR 10.4[c]) are location-specific ARARs for the protection of such resources. These regulations require that activities in any area where such resources are discovered be stopped and reasonable effort be taken to secure and protect the objects discovered.

3.2.3.3 *Threatened and Endangered Species*

No federally endangered species are known to occur on the installation. There are 22 animal species that could potentially be present on or near LHAAP that appear on federal or state threatened and endangered species lists. The historic details regarding the number and date of species sightings are presented in the Caddo Lake Institute (CLI) report (CLI, 1995). Of the 22 animal species that could potentially be present, information received (USFWS, 2003) (Texas Department of Parks and Wildlife, 2003) identified the following list of threatened species and ecological communities of concern that are known or suspected to occur in the vicinity of LHAAP (species that have been confirmed are listed in italics) (Shaw, 2007b).

- **Federal Listed Threatened Species:**
 - *Bald Eagle*
 - Louisiana Black Bear
- **State Listed Threatened Species:**
 - Louisiana Black Bear
 - *Rafinesque's Big-Eared Bat*
 - *Alligator Snapping Turtle*
 - Timber Rattlesnake
 - Bluehead Shiner
- **State Species of Concern:**
 - Southern Lady's Slipper
- **State Special Features/Natural Communities/Managed Areas:**
 - Colonial Waterbird Rookeries
 - Bald Cypress-Water Tupelo Series
 - Shortleaf Pine-Oak Series
 - Water Oak-Willow Oak Series
 - Caddo Lake State Park

Some conflicting evidence is available regarding the potential presence of the Timber Rattlesnake at Longhorn. This State-listed species is described in historical site documents as being confirmed present on the site, but there is no recent documented evidence of this species being present on site (Shaw, 2007b). Therefore, it is assumed for the ARAR evaluation that the Timber Rattlesnake is potentially present, along with the Alligator Snapping Turtle as well as the Bald Eagle and the Rafinesque's Big-Eared Bat. Timber rattlesnakes prefer moist lowland forests and hilly woodlands or thickets near permanent water sources such as rivers, lakes, ponds, streams and swamps where tree stumps, logs and branches provide refuge. Alligator snapping turtles prefer deep waters of ponds, canals, lakes, streams, or swamps where they spend most of their time concealed by mud. Bald eagles in Texas may either represent breeding populations or wintering populations, and tend to roost on large lakes and rivers with tall trees for nesting and unobstructed flight paths to food sources (typically fish). Although Rafinesque's big-eared bats roost in cave entrances, abandoned buildings and under bridges, the preferred roosting sites for these bats are large, dead, hollow trees. Timber Rattlesnakes have not been observed at the Installation by resident wildlife experts, and large water bodies with deep pools required by alligator snapping turtles are not present at this site. Common bat roosting locations, such as dead tree snags and abandoned buildings are not features at this site, and no bald eagle nests are documented as being present in this area. Furthermore, although the site may be used occasionally by bald eagles or Rafinesque's big-eared bats during migration or as part of a foraging territory, this site is too small (85 acres) for regular exposure to occur for these species, which have home ranges of hundreds of acres. The potential for these threatened species to be present at LHAAP-29 is low.

Thus, based on current information, potential remedial action alternatives are not expected to harm any federal- or state-listed threatened or endangered species or their critical habitat. The requirements of the federal Endangered Species Act (16 USC 1531 et seq.), the federal Bald Eagle Protection Act (16 USC 668 et seq.), and the Texas Resource Protection Act (31 TAC 69, Subchapters A and B, and 31 TAC 65, Subchapter G) would be location-specific ARARs in the event that such species or habitats could be impacted by any proposed remedial alternatives. These ARARs are included in **Table 3-2** in the event that such threatened and endangered species/habitats are identified at LHAAP-29 in the future.

3.2.3.4 Sensitive Habitats

A sensitive habitat is defined within the CERCLA hazard ranking system (40 CFR 300, Appendix A) as one that contains an important biological resource or a particularly fragile resource. Wetlands are specifically included as a type of sensitive habitat. Other sensitive habitats include plant communities of unusual or limited distribution and important seasonal-use areas for wildlife (e.g., migration routes, breeding areas, or crucial winter habitat).

The Fish and Wildlife Coordination Act (16 USC 661 et seq.) requires that the effects of water-related projects that modify, divert, or control waters, including drainage activities, be considered with a view to preventing loss of and damage to such resources. This act may provide ARARs if groundwater diversion or treatment activities will impact groundwater-to-surface-water drainage patterns such that fish or wildlife may be adversely affected.

The Caddo Lake National Wildlife Refuge lies adjacent to LHAAP. The expected future use of LHAAP-29 is to be part of that refuge. In light of this future use, the National Wildlife Refuge System Act (50 CFR 35) would be a potential ARAR for impacted areas that will become part of the designated national wildlife refuge system.

Although there are low-lying wetland areas associated with Goose Prairie Creek, Central Creek, Saunder's Branch, and Harrison Bayou, no formal wetlands survey has been conducted at the LHAAP specifically (USACE, 1992; Jacobs, 2001). Nearby Caddo Lake, however, into which LHAAP surface waters flow is part of the Big Cypress Bayou, which is considered a wetland of international significance. Adverse impacts to any identified wetlands located at LHAAP or to the Caddo Lake/Big Cypress Bayou wetland system from remedial actions at LHAAP-29 must be avoided to the extent practicable. If identified wetlands will be impacted and wetland mitigation is required, Title 12, Chapter 221 (*Wetlands Mitigation*) of the Texas Code, as well as the federal standards for wetland mitigation, may provide location-specific ARARs. These requirements will be evaluated during the final ROD stage as further site-specific data are collected and the preferred alternative is proposed and evaluated.

3.2.3.5 *Floodplains*

Executive Order 11988 (*Floodplain Management*, May 24, 1997) requires evaluation of potential effects of actions in floodplains, consideration of flood hazards, and that floodplain management is ensured. If action is taken in floodplains, the order requires consideration of alternatives that avoid adverse effects and incompatible development and minimize potential harm. This order, as summarized in **Table 3-2**, is TBC guidance for LHAAP-29 remedial activities if such activities should impact identified floodplains.

3.2.4 *Potential Action-Specific ARARs*

Action-specific ARARs include operation, performance and design requirements or limitations based on the waste types, media, and remedial activities. This section provides a preliminary identification and evaluation of potential federal and state of Texas action-specific ARARs for the proposed remediation of LHAAP-29.

Pursuant to USEPA guidance, there are no action-specific ARARs for the required no action alternative (USEPA, 1991). The action-specific ARARs for the activities common to the

remedial action to be conducted at LHAAP-29 are discussed in **Section 3.2.4.1** below. All action-specific ARARs are listed in **Table 3-3** and are grouped by component action.

Each of the proposed remedial action alternatives will involve several of the following activities: waste generation, characterization, management, storage, and disposal activities; land use controls (LUCs) and long-term monitoring; and water treatment. Action-specific ARARs are discussed here for the activities common to the remedial activities to be proposed for LHAAP-29.

3.2.4.1 Site Preparation, Construction, and Excavation Activities

Certain on-site preparation, construction, and/or excavation activities will be necessary under all remediation actions to prepare the site for remediation, including the soil-moving or site-grading activities. Control of fugitive emissions and storm water runoff during implementation of these activities will be required.

Airborne particulate matter resulting from construction or excavation activities is subject to the fugitive dust and opacity limits listed in 30 TAC 111, Subchapter A. No person may cause, suffer, allow, or permit visible emissions from any source to exceed an opacity of 30 percent for any 6-minute period [30 TAC 111.111(a)]. Reasonable precautions must also be taken to achieve maximum control of dust to the extent practicable, including the application of water or suitable chemicals or the complete covering of materials (30 TAC 111.143 and 30 TAC 111.145).

Texas has also promulgated general nuisance rules for air contaminants mandating that no person shall discharge from any source whatsoever one or more air contaminants, or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property (30 TAC 101.4).

Storm water discharges from construction activities that disturb equal to or greater than one acre of land must comply with the substantive requirements of a USEPA National Pollutant Discharge Elimination System general permit (40 CFR 122.26; 30 TAC 205, Subchapter A; and 30 TAC 308.121), depending on the amount of acreage disturbed. Substantive requirements include implementation of good construction management techniques; phasing of large construction projects; minimal clearing; and sediment, erosion, structural, and vegetative controls to mitigate runoff and ensure that discharges meet required parameters.

3.2.4.2 Waste Generation, Characterization, Management, Storage, and Disposal Activities

The processes of monitoring, intercepting, or treating contaminated groundwater may generate a variety of primary and secondary waste streams (e.g., soil, personal protective equipment [PPE],

and dewatering and decontamination fluids). These waste streams are expected to be non-hazardous waste. All solid waste (defined as any solid, liquid, semisolid, or contained gaseous material intended for discard [40 CFR 261.2]) generated during remedial activities must be appropriately characterized to determine whether it contains RCRA hazardous waste (40 CFR 262.11; 30 TAC 335.62; 30 TAC 335.503[a][4]; 30 TAC 335.504). All wastes must be managed, stored, treated (if necessary), and disposed of in accordance with the ARARs for waste management listed in **Table 3-3** for the particular type of waste stream or contaminants in the waste.

Excavated environmental media including soil excavated during the installation of monitoring/extraction wells would be sent off site for disposal or, in the case of non-hazardous trenching or well construction soil, redeposit within the area of contamination (AOC). The USEPA defines “onsite” as the aerial extent of contamination and all suitable areas in close proximity to the contamination necessary for the implementation of the CERCLA response action and notes that such contamination may contain varying types and concentrations of hazardous substances (53 FR 51444; 55 FR 8758). The soil generated from remedial activities at LHAAP-29 is expected to be hazardous. ARARs for the management of such media at the site of generation (i.e., within the AOC) are listed in **Table 3-3**. Other requirements for hazardous waste such as manifesting for off-site disposal (40 CFR 262.20) and planning/implementing off-site response action (40 CFR 300.440) will be complied with even though they are not considered an ARAR.

The USEPA has stated that excavation and redeposition of contaminated soil within an AOC does not constitute “generation”; therefore, the requirements of 40 CFR 262.11 and 268.7 to characterize generated wastes are not applicable (Office of Solid Waste and Emergency Response Directive 9441.1992[16], June 11, 1992). Consolidation of waste between AOCs for treatment or disposal, however, or excavation and treatment with subsequent disposal in the same AOC or off-site disposal constitute “placement.” In these situations, RCRA Subtitle C requirements for the generation, handling, treatment, and disposal of such wastes are applicable if the waste/media is determined to contain RCRA hazardous waste (Volume 55, Federal Register [FR], page 8758).

3.2.4.3 Land Use Controls and Long-Term Monitoring

Some combination of restrictive covenants, administrative controls, physical barriers, physical surveillance or other controls, in combination with long-term monitoring of groundwater, would be necessary under all remedial alternatives to restrict access to contamination and protect human health and the environment because none of the actions will completely remove all of contamination to levels that would allow unrestricted access and use of the site.

When engineering or LUC measures are required to protect human health and the environment, 30 TAC 335.565 requires compliance with the identified post-closure care requirements and

deed recordation of the facility in accordance with Sections 335.566(b) through (e). The deed recordation must include a description of post-closure measures required and any LUCs placed on the future use of the property, as well as a metes and bounds description of the tract of land. Since there is no deed for federal land, when the U.S. Army transfers the land to the USFWS, a recordation of the LUC, as required by the State of Texas, will accompany the transfer. If the land is transferred from a federal entity to a non-federal entity, it is transferred by deed. Some or all of these requirements may be ARARs for this remedial action; the specific combination of controls negotiated for this action would be listed in a signed ROD.

3.2.4.4 Well Construction

All of the proposed alternatives, other than the no action alternative, may involve the placement, use, or eventual plugging and abandonment of some type of groundwater monitoring, injection, and/or extraction wells, either for in situ treatment or extraction of the contaminated groundwater or for long-term monitoring of the groundwater. Available standards for well construction and plugging/abandonment would provide ARARs for such actions.

Texas has promulgated technical requirements in Chapter 76 of Title 16 of the TAC applicable to construction, operation, and plugging/abandonment of water wells. In particular, 16 TAC 76.1000 (*Locations and Standards of Completion for Wells*), 16 TAC 76.1002 (*Standards for Wells Producing Undesirable Water or Constituents*) (LHAAP-29 contaminated groundwater could be considered “undesirable water” defined pursuant to Section 76.10[36] as “water that is injurious to human health and the environment or water that can cause pollution to land or other waters”), 16 TAC 76.1004 (*Standards for Capping and Plugging of Wells and Plugging Wells that Penetrate Undesirable Water or Constituent Zones*), and 16 TAC 76.1008 (*Pump Installation*) may provide ARARs for the placement, construction, and eventual plugging/abandonment of groundwater injection or extraction wells or the placement and long-term operation of groundwater monitoring wells for proposed groundwater remedial strategies.

Texas has promulgated technical requirements in 30 TAC 331 applicable to construction and abandonment of Class V injection wells. The temporary wells to be used in applying chemical oxidants to the plume of MC in the intermediate groundwater zone fit the category of Class V injection wells.

3.2.4.5 Water Treatment

Contaminated groundwater and wastewaters collected during well drilling, groundwater extraction or decontamination activities could be transported to the on-site water treatment facility constructed as a component of the previous interim remedial action at other LHAAP sites (LHAAP-18/24) and would subsequently be discharged in compliance with the CWA outfall limits for the facility as listed in the ROD. Such waters would be characterized, as required, before transport and managed accordingly in compliance with requirements for the type of waste

contaminating the water. To assure compliance with the water treatment plant's discharge limits, the incoming water must meet the waste acceptance criteria for the facility. On-site wastewater treatment units (as defined in 40 CFR 260.10) that are part of a wastewater treatment facility that is subject to regulation under Section 402 or Section 307(b) of the CWA are not subject to RCRA Subtitle C hazardous waste management standards (40 CFR 270.1[c][2][v]; 40 CFR 264.1[g][6]; 30 TAC 335.42[d][1]). The USEPA has clarified that this exemption applies to all tanks, conveyance systems, and ancillary equipment, including piping and transfer trucks, associated with the wastewater treatment unit (53 FR 34079, September 2, 1988).

3.3 *Preliminary Cleanup Levels*

Cleanup levels are the concentrations for individual chemicals in soil and groundwater above which some response action (e.g., treatment, LUCs) would be required. The cleanup levels for soil, groundwater, and solid residue in the cooling water lines at LHAAP-29 are determined with consideration of the risk to human health, the risk to ecological receptors, and the ARARs identified for the site in **Section 3.2.2**.

3.3.1 *Soil*

Perchlorate was not identified as a COC in the risk assessment; however, it has been carried forward as a COC in this document because perchlorate is present in groundwater at LHAAP-29 at concentrations that represent a potential non-carcinogenic human health hazard and perchlorate in on-site soils is considered as the primary source. Perchlorate will be remediated to the more stringent of the SAI-Ind and GWP-Ind standards, which is GWP-Ind.

Target COPECs above the risk-based EcoPRGs are co-located with the soil and sediments containing explosives in the cooling water outfall ditch. Removal of the soils at this location will address ecological risk concerns presented in the BERA as well as human health concerns. **Table 3-4** presents the applicable cleanup level for the target contaminants.

3.3.2 *Groundwater*

The cleanup levels for groundwater at LHAAP-29 are the MCLs (when available) and the TCEQ GW-Ind (TCEQ, 2006) for chemicals without MCLs. Groundwater at LHAAP-29 has unacceptable risk or hazard primarily due to MC, TCE and perchlorate. Some of the chemicals (e.g., TCE) have degradation products with MCLs, and those degradation products have also been identified as COCs. **Table 3-5** summarizes the COCs and the proposed cleanup levels for groundwater using the MCLs and GW-Ind. The metals COCs are retained as provisional COCs based on preliminary data. The extent of these inorganic COCs will be assessed at wells site wide during the Remedial Design.

3.3.3 *Cooling Water Lines*

The cleanup levels for solid residue in the cooling water lines at LHAAP-29 are the GWP-Ind values. Solid residue in the cooling water lines exceeded the GWP-Ind for 2,4-DNT in manholes 8 and 10. If similar thicknesses and concentrations of solid residue exist in the adjacent pipelines, then 2,4-DNT could potentially leach into groundwater at unacceptable concentrations if the pipe deteriorates. **Table 3-6** summarizes the COCs and the proposed cleanup levels for solid residue in the lines using the GWP-Ind values.”

Table 3-1
Potential Chemical-Specific ARARs/TBCs

Citation	Activity or Prerequisite/Status	Requirement
Surface/Subsurface Soils		
TCEQ Texas Risk Reduction Rules 30 TAC 335.558 and 335.559(d)(2)	Ensures adequate protection of human health and the environment from potential exposure to contaminants associated with releases – relevant and appropriate for remediation of contaminated soil for cross-media contamination pathways such as soil to groundwater and for hypothetical future maintenance workers.	Near surface (i.e., 0-2 feet bgs) non-residential (industrial) soils shall conform to the non-residential soil MSCs (SAI-Ind) based upon worker ingestion of soil, inhalation of particulates and volatiles and the non-residential soil-to-groundwater cross media protection concentration. The concentration of contamination in soil shall not exceed the non-residential soil-to-groundwater cross media (GWP-Ind). See Table 3-4 for specific numeric criteria.
Groundwater		
Federal Safe Drinking Water Act MCLs/Non-Zero MCLGs 40 CFR 141	Applicable to drinking water at the tap— relevant and appropriate for water that could potentially be used for human consumption.	Must not exceed MCLs/non-zero MCLGs for water designated as a current or potential source of drinking water. See Table 3-5 for specific numeric criteria.
TCEQ Texas Risk Reduction Rules 30 TAC 335	Applicable to industrial groundwater— relevant and appropriate for hypothetical future maintenance worker exposure to groundwater	If no maximum contaminant level has been promulgated, groundwater must not exceed the industrial medium-specific concentration. See Table 3-5 for specific numeric criteria.

Abbreviations:

ARAR applicable or relevant and appropriate requirement
bgs below ground surface
GWP-Ind soil MSC for industrial use base on groundwater protection
MCL maximum contaminant level
MCLG maximum contaminant level goal

MSC medium-specific concentration
SAI-Ind soil MSC for industrial use based on inhalation, ingestion, and dermal contact
TAC Texas Administrative Code
TBC to-be-considered [guidance]
TCEQ Texas Commission on Environmental Quality

Table 3-2
Potential Location-Specific ARARs/TBCs

Resource/Citation	Activity or Prerequisite Status	Requirement
Preservation of Archaeological and Paleontological Artifacts National Historic Preservation Act (16 USC 470 et seq.); 43 CFR 7.5(b)(1); 36 CFR 800; 13 TAC 15; 13 TAC 25	Excavation activities that inadvertently discover such archaeological or paleontological resources— applicable if such resources are discovered. No known archeological or paleontological resources exist at LHAAP-29.	Action must avoid irreparable harm, loss, or destruction of such resources if discovered. Such resources must be surveyed, designated, and protected in accordance with relevant federal rules and regulations, standards, and guidelines, as these are adopted by the Texas Historical Commission.
Preservation of Native American Artifacts Native American Graves Protection and Repatriation Act (25 USC Section 3001); 43 CFR 10.4(c) and (d)	Excavation activities that inadvertently discover such Native American resources— applicable if such resources are discovered. No known Native American resources exist at LHAAP-29.	Activities in the area of the discovery must be stopped and reasonable effort taken to secure and protect the objects discovered.
Protection of Threatened and Endangered Species (as listed in Table 3-5) Endangered Species Act (16 USC 1531 et seq.); 50 CFR 402; Bald Eagle Protection Act (16 USC 668 et seq.); Texas Resource Protection Act, 31 TAC 69 Subchapters A and B, and 31 TAC 65 Subchapter G	Activities that may adversely impact any state- or federally-listed, threatened or endangered species or their habitat— applicable if such species and/or habitats are impacted	Actions that jeopardize the existence of a listed species or result in the destruction or adverse modification of critical habitat must be avoided, or reasonable and prudent mitigation measures must be taken. No person may take, possess, propagate, transport, export, sell or offer for sale, or ship any species of fish, wildlife, or native plant listed by the Texas Parks and Wildlife Department as endangered or threatened. The Department shall actively seek full restitution for and/or restoration of such a native plant, fish, or wildlife, or habitat loss occurring as a result of human activities.
Protection of Fish and Wildlife Resources Fish and Wildlife Coordination Act (16 USC 661 et seq.)	Action that impounds, modifies, diverts, or controls waters, including navigation and drainage activities— applicable	The effects of water-related projects on fish and wildlife resources and their habitat should be considered with a view to the conservation of fish and wildlife resources by preventing loss of and damage to such resources.
Protection of Caddo Lake National Wildlife Refuge System National Wildlife Refuge System Act (16 USC 668dd-668ee); 50 CFR 35; 31 TAC 69.19	Activities that may adversely impact or cause harm/loss of protected fish, wildlife and/or habitat in such protected areas— relevant and appropriate to impacted areas that will become part of the designated national wildlife refuge system	The taking, disturbance, injury, or damage to any protected plant or animal on a national wildlife refuge is prohibited. The disposal of waste except at designated/approved points or locations or the polluting of any waters, streams, or other areas within any national wildlife refuge is prohibited. Restitution for and/or restoration of fish, wildlife, and habitat loss occurring as a result of human activities is required; appropriate measures include, but are not limited to, direct replacement of fish, wildlife, and/or habitat destroyed.
Protection of Wetlands Section 404 of the Clean Water Act (33 USC 1344); 40 CFR 230.10(a) and (d); Swampbuster Provision of the Food Security Act; Executive Order 11990, "Protection of Wetlands"	Actions that involve the discharge of dredged or fill material into jurisdictional wetlands or actions that have a potential adverse impact to, or take place within, wetlands— applicable if delineated wetlands are present at the site and will be adversely impacted by the action. No known delineated wetlands are located at LHAAP-29.	No discharge of dredged or fill material into an aquatic ecosystem is permitted if there is a practicable alternative that would have less adverse impact. No discharge of dredged or fill material shall be permitted unless appropriate and practicable steps per 40 CFR 230.70 et seq. have been taken, which will minimize potential impacts of the discharge on the aquatic ecosystem.

Table 3-2 (continued)
Potential Location-Specific ARARs/TBCs

Resource/Citation	Activity or Prerequisite Status	Requirement
Protection of Floodplains Executive Order 11988 (<i>Floodplain Management</i> , May 24, 1997)	Activities which involve federally undertaken, financed, or assisted construction and improvements or which involve conducting federal activities and programs affecting land use - applicable if floodplains will be impacted by the remedial action. Floodplains should not be impacted by the remedial action at LHAAP-29.	Action shall be taken to reduce the risk of flood loss, minimize the impact of floods on human safety, health and welfare, and restore and preserve the natural and beneficial values of floodplains. The potential effects of actions in floodplains shall be evaluated, and consideration of flood hazards and floodplain management ensured. Most of LHAAP-29 is not within the 100-year floodplain.

Abbreviations:

ARAR *applicable or relevant and appropriate requirement*
 CFR *Code of Federal Regulations*
 TAC *Texas Administrative Code*
 TBC *to-be-considered (guidance)*
 USC *United States Code*

Table 3-3
Potential Action-Specific ARARs/TBCs

Citation	Activity or Prerequisite/Status	Requirement
General Site Preparation, Construction, and Excavation Activities		
Air Contaminants – General Nuisance Rules 30 TAC 101.4	Emissions of air contaminants— applicable .	No person shall discharge from any source whatsoever one or more air contaminants or combinations thereof, in such concentration and of such duration as are or may tend to be injurious to or to adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property.
Opacity Standard 30 TAC 111.111(a)(8)(A)	Fugitive emissions from land-disturbing activities (e.g., excavation, construction)— applicable .	Visible emissions shall not be permitted to exceed opacity of 30% for any 6-minute period from any source.
Fugitive Particulate Matter Standard 30 TAC 111.145	Fugitive emissions from land-disturbing activities (e.g., excavation, construction)— applicable .	No person may cause, suffer, allow, or permit a structure, road, street, alley or parking area to be constructed, altered, repaired, or demolished, or land to be cleared without taking at least the following precautions to achieve control of dust emissions: <ul style="list-style-type: none"> • Use of water or of suitable oil or chemicals for control of dust in the demolition of structures, in construction operations, in work performed on a road, street, alley, or parking area, or in the clearing of land; and • Use of adequate methods to prevent airborne particulate matter during sandblasting of structures or similar operations.
Storm water Runoff Controls 40 CFR 122.26; 30 TAC 205, Subchapter A; 30 TAC 308.121	Storm water discharges associated with construction activities— applicable to disturbances of equal to or greater than 1 acre of land.	Good construction management techniques, phasing of construction projects, minimal clearing, and sediment, erosion, structural, and vegetative controls shall be implemented to mitigate storm water run-on/runoff.
Waste Generation, Management, and Storage		
Characterization of Solid Waste 40 CFR 262.11 30 TAC 335.62 30 TAC 335.504 30 TAC 335.503(a)(4)	Generation of solid waste, as defined in 30 TAC 335.1— applicable .	Must determine whether the generated solid waste is RCRA hazardous waste by using prescribed testing methods or applying generator knowledge based on information regarding material or process used. If the waste is determined to be hazardous, it must be managed in accordance with 40 CFR 262–268. After making the hazardous waste determination as required, if the waste is determined to be nonhazardous, the generator shall then classify the waste as Class 1, Class 2, or Class 3 (as defined in Section 335.505 through Section 335.507) using one or more of the methods listed in Section 335.503(a)(4) and Section 335.508 and manage the waste in accordance with the requirements of Chapter 335 of the TAC for industrial solid waste.
Characterization of Hazardous Waste 40 CFR 264.13(a)(1); 40 CFR 268.7 30 TAC 335.504(3) 30 TAC 335.509 30 TAC 335.511	Generation of a RCRA hazardous waste for treatment, storage, or disposal— applicable if hazardous waste is generated (e.g., PPE).	Must obtain a detailed chemical and physical analysis of a representative sample of the waste(s) that at a minimum contains all the information that must be known to treat, store, or dispose of the waste in accordance with 40 CFR 264 and 268. Must also determine whether the waste is restricted from land disposal under 40 CFR 268 et seq. by testing in accordance with prescribed methods or use of generator knowledge of waste.

Table 3-3 (continued)
Potential Action-Specific ARARs/TBCs

Citation	Activity or Prerequisite/Status	Requirement
National Oil and Hazardous Substances Pollution Contingency Plan 40 CFR 300.440	Procedure for planning and implementing off-site response actions.	USEPA will determine the acceptability under the selection of any facility selected for the treatment, storage, or disposal of CERCLA waste.
Management of RCRA Hazardous Waters—Wastewater Treatment Unit Exclusion 40 CFR 264.1(g)(6) 40 CFR 270.1(c)(2) 30 TAC 335.41(d)(1)	Treatment/disposal of wastewater containing RCRA hazardous waste— applicable to management of contaminated groundwater if it is determined to contain RCRA characteristically hazardous waste.	On-site wastewater treatment units, as defined in 40 CFR 260.10, that are part of a wastewater treatment facility subject to regulation under Section 402 or Section 307(b) of the CWA are excluded from the requirements of RCRA Subtitle C (Note: USEPA has clarified that this exemption applies to all tank systems, conveyance systems, and ancillary equipment, including transfer trucks, associated with the wastewater treatment unit [53 FR 34079, September 2, 1988]).
Requirements for Temporary Storage of Hazardous Waste in Accumulation Areas 40 CFR 262.34(a) and (c)(1) 30 TAC 335.69(a) and (d)	On-site accumulation of 55 gallons or less of RCRA hazardous waste for 90 days or less at or near the point of generation— applicable if hazardous waste is generated (e.g., PPE) and stored in an accumulation area.	A generator may accumulate hazardous waste at the facility provided that <ul style="list-style-type: none"> • Waste is placed in containers that comply with 40 CFR 264.171 to 264.173 (Subpart I); and • Container is marked with the words "hazardous waste"; or • Container may be marked with other words that identify the contents.
Requirements for the Use and Management of Containers 40 CFR 264.171–264.173 30 TAC 335.69(e) 30 TAC 335.152(a)(7)	On-site storage/treatment of RCRA hazardous waste in containers for greater than 90 days— applicable if hazardous waste is generated (e.g., PPE) and is stored in containers.	Design and operating standards of 40 CFR 264.175(c) and 40 CFR 264.171, 264.172, and 264.173(a) and (b) must be met for the use and management of hazardous waste in containers.
Well Construction Standards—Monitoring or Injection Wells 16 TAC 76.1000	Construction of water wells— applicable to construction of new monitoring or injection wells, if needed.	Wells shall be completed in accordance with the technical requirements of Section 76.1000, as appropriate.
Class V Injection Wells 30 TAC 331, Subchapter H	Installation, operation, and closure of injection wells for in situ chemical oxidation fall in the category of Class V Injection Wells – relevant and appropriate .	Injection wells shall be constructed to the required specifications for isolation casing, surface completion, prevention of commingling, and confinement of undesirable groundwater to its zone of origin. Closure shall be accomplished by removing all of the removable casing and the entire well shall be pressure filled via a tremie pipe with cement from bottom to the land surface, or closure shall be performed by the alternative method for Class V Wells completed in zones of undesirable groundwater. Groundwater concentrations at time of well closure will determine the appropriate method of abandonment.

Table 3-3 (continued)
Potential Action-Specific ARARs/TBCs

Citation	Activity or Prerequisite/Status	Requirement
Well Construction Standards—Extraction Wells 16 TAC 76.1000(a) and (c) through (h) 16 TAC 76.1002(a) through (c) 16 TAC 76.1008(a) through (c)	Construction of water wells— applicable to construction of extraction (recovery) wells.	<p>Wells shall be completed in accordance with the technical requirements of Section 76.1000, as appropriate.</p> <p>Water wells completed to produce undesirable water shall be cased to prevent the mixing of water or constituent zones.</p> <p>The annular space between the casing and the wall of the borehole shall be pressure grouted with cement or bentonite grout to the land surface. Bentonite grout may not be used if a water zone contains chloride water above 1500 ppm or if hydrocarbons are present.</p> <p>Wells producing undesirable water or constituents shall be completed in such a manner that will not allow undesirable fluids to flow onto the land surface.</p> <p>During installation of a water well pump, installer shall make a reasonable effort to maintain integrity of groundwater and to prevent contamination by elevating the pump column and fittings, or by other means suitable under the circumstances. Pump shall be constructed so that no unprotected openings into the interior of the pump or well casing exist.</p>
Treatment/Disposal		
Disposal of Wastewater (e.g., contaminated groundwater, dewatering fluids, decontamination liquids) 40 CFR 268.1(c)(4)(i) 30 TAC 335.431(c)	RCRA-restricted characteristically hazardous waste intended for disposal— applicable if extracted groundwater is determined to be RCRA characteristically hazardous .	Disposal is not prohibited if such wastes are managed in a treatment system subject to regulation under Section 402 of the CWA that subsequently discharges to waters of the United States.
Closure		
Requirements for Closure of a RCRA Container Storage Area 40 CFR 264.111 40 CFR 264.178 30 TAC 335.152(a)(5) 30 TAC 335.152(a)(7)	Closure of a RCRA-permitted container storage area— applicable if hazardous waste is generated (e.g., PPE) and is stored in containers.	<p>Must close unit in a manner that</p> <ul style="list-style-type: none"> Minimizes the need for further maintenance; Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to ground or surface waters or to the atmosphere; and Complies with closure requirements of 40 CFR 178. <p>All hazardous waste and residues must be removed from containment system. Remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or residues must be decontaminated or removed.</p>

Table 3-3 (continued)
Potential Action-Specific ARARs/TBCs

Citation	Activity or Prerequisite/Status	Requirement
Standards for Plugging Wells that Penetrate Undesirable Water or Constituent Zones 16 TAC 76.1004(a) through (c)	Plugging and abandonment of wells— applicable to plugging and closure of monitoring and/or extraction wells.	If a well is abandoned, all removable casing shall be removed and the entire well pressure filled via a tremie pipe with cement from bottom up to the land surface. In lieu of this procedure, the well shall be pressure-filled via a tremie tube with bentonite grout of a minimum 9.1 lb/gal weight followed by a cement plug extending from land surface to a depth of not less than 2 feet. Undesirable water or constituents or the freshwater zone(s) shall be isolated with cement plugs.
Post-Closure Care and Land Use Controls		
Warning Signs in Contaminated Areas 30 TAC 335.443-448	Hazardous substances left in place on contaminated property— relevant and appropriate .	Placement of warning signs on property contaminated with hazardous substances is required when such contamination presents a danger to public health or safety. Warning signs can be removed when it is determined that the remedial action on the contaminated property is complete and that no further hazard to the public health and safety exists.
Land Use Controls when Hazardous Substances are Left in Place 30 TAC 335.565 30 TAC 335.566	Hazardous substances left in place on contaminated property— relevant and appropriate .	Where engineering or land use control measures are required to protect human health and the environment, they must comply with the identified post-closure care requirements and recordation notification with the county for the facility in accordance with Section 335.566. Must make recordation notification with the county or counties in which the activities take place the information specified in Sections 335.566(b) through (e): <ul style="list-style-type: none"> • Description of post-closure measures required, • Description of any land use or legal controls placed on the future use of the property, • Metes and bounds description of the tract of land, and • Statement that pertinent information and documents are available for inspection.

Abbreviations:

ARAR applicable or relevant and appropriate requirement
CFR Code of Federal Regulations
CWA Clean Water Act of 1972
USEPA U.S. Environmental Protection Agency
FR Federal Register
lb/gal pound per gallon

% percent
PPE personal protective equipment
ppm part per million
RCRA Resource Conservation and Recovery Act of 1976
TAC Texas Administrative Code
TBC to be considered (guidance)

Table 3-4
Proposed Cleanup Levels for Target COCs/COPECs in Soil

COCs / COPECs Targeted for Remediation	SAI-Ind (mg/kg)	GWP-Ind (mg/kg)	SS Eco PRG (mg/kg)	TS Eco-PRGs (mg/kg)	Proposed Cleanup Level ^a (mg/kg)
	0-2 feet	Vadose Zone	0 -0.5 feet	0-3 feet	
2,4,6-Trinitrotoluene	510	5.1	6.1	4.7	4.7 ^b 5.1 ^c
2,4-Dinitrotoluene	4.2	0.042	--	12	0.042
2,6-Dinitrotoluene	4.2	0.042	2.7	6.8	0.042
2-Amino-4,6-dinitrotoluene	170	1.7	--	--	1.7
4-Amino-2,6-dinitrotoluene	170	1.7	--	--	1.7
Perchlorate	950	7.2	--	--	7.2

Notes and Abbreviations:

^a Unless otherwise noted, cleanup level applies to soil from surface to groundwater interface

^b Applies from 0 to 3 feet below ground surface

^c Applies from 3 feet below ground surface to groundwater interface

COC contaminant of concern

COPEC contaminant of potential ecological concern

EcoPRG Ecological Preliminary Cleanup level

GWP-Ind soil medium specific concentration for industrial use based on groundwater protection

mg/kg milligrams per kilogram

SAI-Ind soil medium specific concentration for industrial use based on inhalation, ingestion, and dermal contact

SS surface soil

TS total soil

Table 3-5
Proposed Cleanup Levels for Target COCs in Groundwater

COCs Targeted for Remediation	TCEQ RRS2 MSC GW-Ind (µg/L)	MCL (µg/L)
Explosives		
2,4-Dinitrotoluene	0.42	--
2,6-Dinitrotoluene	0.42	--
2-Nitrotoluene (o)	1,000	--
3-Nitrotoluene (m)	1,000	--
4-Nitrotoluene (p)	1,000	--
Anions		
Perchlorate	72	--
Volatile Organic Compounds		
1,2-Dichloroethane	--	5
Methylene Chloride	--	5
Trichloroethene (TCE)	--	5
1,1-Dichloroethene (TCE degradation product)	--	7
1,2-Dichloroethene (TCE degradation product)	--	5
Vinyl Chloride (TCE degradation product)	--	2
Metals		
Arsenic	--	10
Mercury	--	2
Nickel	2,000	--

Notes and Abbreviations:

GW-Ind groundwater MSC for industrial use

MCL Safe Drinking Water Act maximum contaminant level

µg/L micrograms per liter

MSC medium specific concentration

RRS2 Risk Reduction Rule Standard No. 2

TCEQ Texas Commission on Environmental Quality

Table 3-6
Proposed Cleanup Levels for Target COCs
in Cooling Water Lines

Explosive	GWP-Ind (mg/kg)
2,4,6-Trinitrotoluene	5.1
2,4-Dinitrotoluene	0.042
2,6-Dinitrotoluene	0.042
2-amino-4,6-Dinitrotoluene	1.7
4-amino-2,6-Dinitrotoluene	1.7

Abbreviations:

mg/kg *milligrams per kilogram*
GWP-Ind *soil MSC for industrial use based on groundwater protection*
MSC *medium-specific concentration*

4.0 *Identification and Screening of Technologies and Process Options*

The primary objective of identifying, screening, and evaluating potentially applicable technology types and process options for the LHAAP-29 FS is to identify an appropriate range of remedial technologies and process options to be developed into remediation alternatives. This screening process consists of a series of analytical steps that include the following:

- Identify volumes or areas of media of concern, and the associated COCs (**Section 4.1**)
- Identify GRAs (**Section 4.2**)
- Identify and screen remedial technologies and process options (**Section 4.3**)
- Evaluate and select representative process options (**Section 4.4**)

These steps are outlined in the USEPA RI/FS guidance (USEPA, 1988b) and the NCP.

4.1 *Contaminants and Media Volumes of Concern*

Section 2.0 presents detailed site conditions at LHAAP-29. Based on available sampling data, soil, sediment, groundwater, and residual contamination in the former wastewater and cooling water lines at LHAAP-29 have been identified as media of concern because these media pose an unacceptable carcinogenic risk and non-carcinogenic hazard to a hypothetical future maintenance worker. These contaminated media include:

- TNT in soils adjacent to the foundation of the former process buildings 802-A (29SB08), 806-A (stained) and 806-D (29DLineWHW01) are contributing to ecological risks as well as having the potential for migration into groundwater. Contamination in this area is primarily present in the top one (1) foot of soil with an estimated volume of 230 cy.
- Residual explosive compounds remain in the former TNT wastewater and cooling water drain lines and manholes.
- Explosives in sediment and surface soils in the cooling water outfall ditch (29SD46) and immediately adjacent to the north of Avenue D (29SD13, 29SB15, and GPS-12) that are contributing to unacceptable health and ecological risks, respectively. The maximum depth of contamination is 7 feet bgs. Maximum depths of excavation will be 3 feet bgs for an ecological receptor for a total volume of 760 cy.
- Isolated perchlorate-containing soils in the northeastern portion of LHAAP-29 (sample location 29SB86) at a maximum depth of 8 feet bgs or approximately 2,900 cy.
- Dissolved plumes of VOCs, explosive compounds, and perchlorate contamination exist in groundwater at LHAAP-29 that pose an unacceptable cancer risk and health hazard. The extent of the contamination has been determined. Perchlorate, VOCs, and nitrotoluene contamination exists in the shallow zone and has contaminated

approximately 9 million gallons. A VOC plume in the intermediate zone is approximately 21 million gallons (based on MC).

4.2 General Response Actions

GRAs are large groups of remedial actions that typically satisfy the RAOs. The GRAs include no action, LUCs, containment, removal, treatment, and disposal. These GRAs may be combined to form remediation alternatives that meet the RAOs. The following are descriptions of the GRAs:

- **No Action**—The no action GRA is retained throughout the FS process as required by the NCP. The no action alternative provides a comparative baseline against which other alternatives can be evaluated. Under this alternative no remedial action will be taken. The site is considered to be left “as is,” with no LUCs, containment, removal, treatment, or other mitigating actions.
- **Land Use Controls**—LUCs include institutional and administrative controls that would reduce or eliminate access to the site. The volume, mobility, and toxicity of the contaminants are not reduced through the application of LUCs. LUCs are generally combined with other GRAs to meet the RAOs.
- **Containment**—Another method of reducing risk to receptors is through containment, which reduces access to the contaminated medium or the migration potential of the contaminated medium. The contaminated medium must be isolated from the primary transport mechanisms such as precipitation migration through the soil column and groundwater flow. This isolation may be accomplished through capping of contaminated soils or the installation of subsurface barriers to prevent groundwater migration.
- **Removal**—Removal GRAs extract the contaminated medium from its present location and move it to an alternative location for treatment and/or disposal. These removal technologies can be selected to reduce exposure to receptors and can be used in conjunction with treatment processes.
- **In Situ Treatment**—In situ treatment GRAs or process options reduce the toxicity, mobility, or volume of the contaminated medium. Chemicals are added, physical properties of the medium are changed, or biological activity of the medium is modified without removal.
- **Ex Situ Treatment**—Ex situ treatment GRAs involve the reduction of toxicity, mobility, or volume of contaminated medium. Ex situ treatment processes are typically coupled with removal and disposal process options.
- **Disposal**—Disposal GRAs involve the discharge of the contaminated medium. Disposal process options are typically coupled with removal and treatment process options.

4.3 *Screening of Technologies*

This section presents the approach to technology and process option screening. In the technology screening process, GRAs are identified that, by themselves or in combination with other GRAs, could be implemented to meet the RAOs established for LHAAP-29. Technologies associated with each GRA and process options associated with each technology are identified. Process options that are not technically feasible for the site are eliminated (screened out) from further consideration. If all of the process options under a given technology are screened out, the entire technology is eliminated.

The technologies and process options are initially screened for technical applicability to identify those to be carried forward for further evaluation. The screening process reduces the number of possible process options for a given technology to a number that is appropriate for consideration at LHAAP-29. The following are the two general criteria used to determine if a technology or process option should be retained for further evaluation:

- Applicability to the type and combination of contaminants
- Applicability to the site's physical conditions

Figures 4-1 and **4-2** present the technologies and process options considered for LHAAP-29 soil and groundwater, respectively. Process options not considered technically applicable were not retained for further evaluation; the rationale for their elimination is shown in these figures.

4.4 *Evaluation and Selection of Representative Process Options*

In this section, each of the process options retained from the initial screening in **Section 4.3** (**Figures 4-1** and **4-2**) are further evaluated and screened, further reducing the list of process options that are developed into alternatives in **Section 5.0**. Process options are evaluated using three criteria: effectiveness, implementability, and cost. Based on these criteria, representative process options are selected for each technology. The representative process options provide a basis for developing alternatives in the FS.

The general descriptions of the process options retained from the screening, along with the relevant aspects of effectiveness, implementability, and cost, are discussed. The effectiveness evaluation considers the following: (1) the potential effectiveness of process options in handling the estimated areas or volumes of the medium; (2) the contribution toward meeting any of the goals identified in the RAOs; (3) the potential impacts to humans and the environment during the construction and implementation phase; and (4) how proven and reliable the process is with respect to the contaminants and conditions at the site.

The implementability evaluation considers both the technical and administrative feasibility of implementing a process option. Implementability concentrates on the difficulty of implementing the option, including the number of treatability studies required, the extent of innovative design

required, and the extent of site preparation needed. Unusual equipment or unusual conditions for standard equipment may decrease the ease of implementation. The institutional aspects of implementability such as permitting and availability of services are also considered.

The cost evaluation focuses on the relative capital and operation and maintenance (O&M) costs required. A ranking of high, medium, or low relative to other similar process options is given; each ranking considers both capital and O&M costs. Based on this evaluation, one or more representative process options are selected for each response action to be carried forward into the development of alternatives. The selection of representative process options for the development of alternatives does not eliminate the remaining process options from future consideration. Those process options not carried forward may be reconsidered during the development of the PP, ROD, or remedial design.

4.4.1 Soil/Sediment

The soil process options will be evaluated to address residual explosives in the drain lines, soil, and sediment, and perchlorate in the soil. The risks and hazards posed to hypothetical future maintenance workers and ecological receptors as well as the potential migration of contaminants to groundwater from residual contamination will be addressed.

4.4.1.1 No Action

The “no action” process option does not provide additional remediation, maintenance, or security activities at contaminated soil or sediment areas at LHAAP-29. The lack of a remedial action can lead to receptor exposure to the contaminated soil or sediment. This process option is retained as a baseline with which other remediation alternatives are compared.

- **Effectiveness**—This response action could have negative long-term impacts on human health and the environment. Industrial use at LHAAP-29 would result in risks to humans from exposure to contaminated soil and sediment.
- **Implementability**—No implementation is required.
- **Cost**—None.

4.4.1.2 Land Use Controls

LUCs would be implemented to regulate access to soil and groundwater and include covenants/deed restrictions, administrative controls, and physical mechanisms. This process option controls exposure by restricting access and use of the contaminated soil and groundwater and also provides information needed to assess future conditions at the site. The LUC process option is applicable to the soil and groundwater at LHAAP-29. Notification of industrial/recreational use will accompany all transfer documents and will be recorded in the County Courthouse. Five-year reviews will be performed to document that the land use remains consistent with the industrial/recreational exposure scenario evaluated in the risk assessment.

4.4.1.2.1 Access Controls

Access controls would be implemented to regulate access to the contaminated soil and sediment areas. The process options for access controls include covenants, administrative controls, and physical barriers/security.

Covenants. To protect human health, restrictions can be placed on the use of the contaminated site through modifications to the property deed or transfer documents. Deed restrictions would be needed only if the U.S. Army releases the property to a non-federal entity. These restrictions are only effective as long as they are enforced by the property owners and local authorities. The U.S. Army is ultimately responsible for the enforcement of LUCs.

- **Effectiveness**—Covenants are effective, if enforced, in controlling human activities such as construction activities. These actions can limit or prevent exposure to contaminants remaining on the site after remediation and can be implemented on a temporary basis. However, their effectiveness declines with time as institutional knowledge is lost.
- **Implementability**—These options can be readily implemented.
- **Cost**—Low.

Administrative Controls. Administrative controls consist of the use of procedures to limit access to sites to control access to both surface and subsurface contamination. Permits for subsurface penetration or excavation can be used. Notices can be filed with local authorities defining the presence of hazardous waste. These are controls the U.S. Army can use while they maintain control of the site.

- **Effectiveness**—Administrative controls are effective in controlling human intrusion into contaminated areas during and after remediation. Procedures that limit certain activities in the vicinity of the wastes and access to the site which limits exposure. However, it is not effective for controlling the soil-to-groundwater pathway or for ecological receptors. Administrative controls can be used in conjunction with barriers and deed restrictions. This option is effective only while the administrative controls are enforced.
- **Implementability**—Procedures are readily available and implemented. They may need to be modified for LHAAP-29.
- **Cost**—Low.

Physical Mechanisms. Physical mechanisms include physical barriers intended to limit access to property, such as fences or signs. However, the future use of the site is to be a part of a national wildlife refuge under the USFWS. It is anticipated that restrictions and administrative

controls will be adequate to control access to the contaminated groundwater and physical mechanisms will not be required.

- **Effectiveness**—Physical barriers and security are effective in controlling human intrusion into contaminated areas during and after remediation. This option is effective only as long as the barriers and security mechanisms are maintained. However, it is not effective for controlling the soil-to-groundwater pathway or for ecological receptors.
- **Implementability**—This option is readily implemented with available equipment and personnel.
- **Cost** - Low.

4.4.1.2.2 *Monitoring*

Monitoring is used to assess the performance of remedial actions and verify compliance with the established RAOs. Process options for monitoring are physical surveillance and long-term media monitoring.

Physical Surveillance. Visual and physical inspections of engineered remedial action components can detect physical changes (e.g., cracks in caps, erosion, unwanted vegetation, holes in fences, etc.) that may ultimately lead to the failure or unsatisfactory performance of that component. Repairs and/or revised maintenance activities can be implemented as a result of these inspections. However, it is not effective for controlling the soil-to-groundwater pathway or for ecological receptors.

- **Effectiveness**—Physical surveillance is effective in determining the continued integrity of engineered systems and the need for repairs and/or replacement. Physical surveillance needs to be used with contaminant monitoring to assess the impact of integrity failure.
- **Implementability**—Physical surveillance is easily implemented. It requires experienced, but readily available, personnel to make regular visits to the site for inspections. Existing engineered controls at LHAAP are currently being inspected.
- **Cost**—Low.

4.4.1.2.3 *Summary of Land Use Control Process Options*

Since LUCs will not prevent soil-to-groundwater contamination or exposure of ecological receptors, LUCs are not retained as a process option.

4.4.1.3 Containment

The containment GRA consists of technologies that limit the migration of contaminants and the associated potential for exposure, but they do not reduce contaminant mobility, toxicity, or volume. The technologies considered are soil, asphalt or multilayer capping.

4.4.1.3.1 Capping

The capping technology is intended to minimize (1) infiltration of surface water/precipitation and subsequent leachate generation caused by percolation of water through the waste, (2) mobilization of contaminants through wind or water erosion, or (3) direct contact with surface or subsurface contamination by intruders or biota. The capping process options considered are soil covers, asphalt caps, and multilayer caps.

Soil Cover. Soil covers consist of a layer of soil placed over contamination. Vegetation is generally encouraged to limit erosion. The purpose of the cover is to prevent access or exposure to the contamination, but the cover does not control infiltration of water through the contamination. It is best used on contamination that is relatively insoluble or in combination with a treatment technology that renders the contamination insoluble.

- **Effectiveness**—A soil cover can be very effective at preventing access to explosives in surface soil. It is not applicable to deeper soil that already has a layer of clean soil between the contamination and the receptor.
- **Implementability**—Soil covers are easy to implement. Standard earthmoving equipment can move local soil over the contaminated areas. Portions of LHAAP-29 may require some initial clearing. Soil cover maintenance to limit large vegetative growth that could disrupt the cover and to control erosion would be needed. Frequent maintenance (mowing) would be required.
- **Cost**—Low.

Asphalt Cap. Asphalt caps control infiltration of rainwater or run-on water through the installation of impermeable asphalt. This process option is particularly useful if the site is to be used as a parking lot or other light industrial use.

- **Effectiveness**—Asphalt caps can be effective at reducing infiltration if sufficient maintenance occurs. Asphalt can quickly develop cracks and holes that need to be filled, and maintenance will be needed to repair them as they occur. These caps are most effective if the area needs to be asphalted for another use that will promote its long-term maintenance.
- **Implementability**—Asphalt caps are easy to install. As with other caps to control infiltration, they need to be sloped to encourage runoff during rain events. Frequent maintenance is less necessary than with multilayer caps as the asphalt does not require

mowing. However, asphalt cracks easily and this must be controlled to maintain effectiveness.

- **Cost—Low.**

Multilayer Cap. A multilayer cap is an engineered cover that can consist of various layers of soil, clay, membranes and other materials. Multilayer caps control infiltration of rainwater or run-on water through the installation of impermeable layer materials and can prevent access or exposure to the contamination.

- **Effectiveness—**Multilayer caps can be effective at reducing infiltration if sufficient maintenance occurs. Long-term maintenance would be required for ensure cracks and holes do not develop. Maintenance will be needed to repair them as they occur.
- **Implementability—**A multilayer cap is more difficult to implement than a soil or asphalt cap due to the design and installation requirements. As with other caps to control infiltration, they need to be sloped to encourage runoff during rain events. More maintenance is necessary with a multilayer cap than an asphalt cap as frequent mowing is required. The multilayer cap must be inspected and maintained to ensure its long-term effectiveness.
- **Cost—High.**

Plug and Abandon Lines. Plugging and abandoning lines consists of completely filling the piping or plugging the inlets and outlets (e.g., with a cementitious grout). Plugging and abandoning can prevent migration of solid residue from the lines, minimize contact between contaminants and surrounding groundwater, and prevent access or exposure to the contamination.

- **Effectiveness—**Plugging and abandoning lines can be effective against migration and leaching if occasional maintenance is performed. Maintenance would be required to ensure the inlets and outlet plugs remain intact, or to repair them as needed.
- **Implementability—**Plugging and abandoning lines is relatively simple to implement. Inlets and outlets may be filled in and/or covered with clean local soil or concrete. For greater resistance to leaching, some form of grout or flowable material may be used to fill the interior of the pipe lines before plugging the inlets and outlets.
- **Cost—Moderate.**

4.4.1.3.2 *Summary of Containment Process Options*

The soil cover alternative is a representative process option for addressing the relatively insoluble explosive contamination in the surface soil and sediments. It provides the least expensive option that meets the needs of a containment option. However, the capping options do not prevent the contaminated soil from continuing to impact groundwater and thus would be less

protective of human health and the environment than other alternatives. Therefore, the containment process options for soil and sediment are removed from further consideration.

Plugging and abandoning lines is a generally effective and efficient method of addressing buried piping. Therefore, the containment process option of plugging and abandoning lines is retained for further consideration.

4.4.1.4 Removal

The removal GRA consists of technologies that remove contaminated media or waste material to either relocate it or prepare it for treatment and/or disposal. The removal technology considered is excavation with a process option of conventional excavation.

4.4.1.4.1 Excavation

Conventional Excavation. This excavation method uses a variety of conventional excavation equipment to remove debris, soil, and other buried waste. The equipment can include excavators, track loaders, bulldozers, and tool carriers of differing sizes with attachments or manipulators suitable for dealing with a varied waste profile. This equipment can be used individually or together as circumstances dictate. It is considered applicable to the pipelines and contaminated soil and sediments at LHAAP-29. It can be used for both shallow and deep soil.

- **Effectiveness**—Conventional excavation equipment is applicable to the LHAAP-29 soils. The equipment has consistently proven reliable and effective for soil and other media in hazardous and non-hazardous applications for decades. Various attachments can increase the versatility of the equipment, allowing their use with a wide range of wastes. Ancillary equipment for screening, sorting, and segregation can be effectively integrated with conventional excavation equipment.

The hazards to operators, in addition to the normal excavation hazards, come from exposure to contaminated media. Misting or fixative agents can reduce fugitive dust emissions during excavation. Buried piping and any residual contents in the piping, can also pose hazards to both human health and the environment when pipes are broken or disturbed during excavation. PPE can reduce or eliminate exposure from inhalation/ingestion or dermal contact. The potential for releasing contamination (from residual contamination inside the lines, clay pipe with asbestos wicking, and transite asbestos containing pipe) during removal of the pipelines is likely.

- **Implementability**—Conventional excavation is readily implemental, and the equipment, attachments, and operators are widely available. The equipment can be readily adapted to the material and conditions at the site. Special handling and disposal considerations would apply to any transite piping that is excavated.
- **Cost**—Moderate.

4.4.1.4.2 *Summary of the Removal Process Option*

Conventional excavation equipment is carried forward as the representative process option for soil removal because of its effective application for a wide range of wastes, its equipment availability, and its widespread use in environmental restoration activities. Excavation of piping is not carried forward due to potential to disturb the asbestos containing materials during removal.

4.4.1.5 *Ex Situ Treatment*

Ex situ treatment technologies provide varying levels of waste treatment following removal of the waste. These technologies are applied to reduce the volume, mobility, or toxicity of the waste. The ex situ treatment technologies considered are physical/chemical, thermal, and biological treatment. Ex situ treatment could be considered if excavated material requires treatment before disposal to meet waste acceptance criteria or if complete treatment could be achieved so remaining material is clean.

4.4.1.5.1 *Thermal Treatment*

Thermal treatment destroys and/or removes organic and volatile metal contaminants. The process option considered is incineration.

Incineration. Incineration is an ex situ thermal destruction process in which organic compounds is destroyed by exposure to extremely high temperatures. It is considered applicable to the source problems at LHAAP-29. Many different systems are available: rotary dryer systems, indirect-fired systems, direct-fired systems, screw-type systems, and asphalt plant aggregate driers. Each system uses the same basic principle of operation, which is a furnace to remove and destroy organic compounds in the waste feed. One of the more common systems, a rotary kiln incinerator, feeds the waste material into the upper end of a sloped rotating kiln. The slope and the rotating action conveys the waste to the low end of the kiln, exposing the waste to the heated gases (up to 1,800 degrees Fahrenheit [°F]) in the kiln and vaporizing and destroying the contaminants. The combustion gases are then drawn through an afterburner (2,200°F) and scrubbing system before discharge to the atmosphere.

- **Effectiveness**—Incinerators have been effectively used for years on organic-contaminated media and are the Best Demonstrated Available Technology for many RCRA organics. It is applicable to most, if not all, of the organic- and explosives-contaminated wastes at LHAAP-29. The destruction capabilities of an incinerator allow the achievement of relatively low cleanup levels. Incineration is a robust technology that can handle a wide variety of organic compounds and concentrations because of its high temperatures. The disadvantages of incineration are that some organics generate toxic products of incomplete combustion, some materials are not incinerable, the capital and operating costs are high, and supplemental fuel is often required. If the ash contains heavy metals, the ash may have to be stabilized before disposal as a RCRA waste.

- **Implementability**—Incineration systems are available for both on- and off-site use. The off-gas stream may require additional treatment and may produce a residue that requires disposal. Thermal treatment systems are generally not well received by the public because of concerns with air emissions.
- **Cost**—High.

4.4.1.5.2 *Biological Treatment*

Biological treatment process options use biological processes to degrade or destroy contaminants. The ex situ process evaluated is composting.

Composting. Composting is a controlled biological process by which organic contaminants (e.g., VOCs) are converted by microorganisms (under aerobic and anaerobic conditions) to innocuous, stabilized byproducts. Typically, thermophilic conditions (54–65 degrees Celsius [°C]) must be maintained to properly compost soil contaminated with hazardous organic contaminants. The increased temperatures result from heat produced by microorganisms during the degradation of the organic material in the waste. In most cases, this is achieved by the use of indigenous microorganisms. Soil is excavated and mixed with bulking agents and organic amendments, such as wood chips, and animal and vegetative wastes, to enhance the porosity of the mixture to be decomposed. Maximum degradation efficiency is achieved through maintaining oxygenation (e.g., daily windrow turning), irrigation as necessary, and closely monitoring moisture content and temperature. There are three process designs used in composting: aerated static pile composting (compost is formed into piles and aerated with blowers or vacuum pumps), mechanically agitated in-vessel composting (compost is placed in a reactor vessel where it is mixed and aerated), and windrow composting (compost is placed in long piles known as windrows and periodically mixed with mobile equipment). Windrow composting is usually considered to be the most cost-effective composting alternative. Meanwhile, it may also have the highest fugitive emissions. If VOC or SVOC contaminants are present in soil, off-gas control may be required.

- **Effectiveness**—The composting process may be applied to soil contaminated with biodegradable organic compounds. Pilot and full-scale projects have demonstrated that aerobic, thermophilic composting is able to reduce the concentration of VOCs, polyaromatic hydrocarbons, and explosives [TNT, hexahydro-1,3,5-trinitro-1,3,5-triazine (RDX), and octahydro-1,3,5,7-tetranitro-1,3,5,7-tetrazocine (HMX)]. The addition of amendments will increase the volume of the waste. Windrow composting has been demonstrated as an effective technology for treatment of explosives-contaminated soil.
- **Implementability**—All materials and equipment used for composting are commercially available. Substantial space may be required for composting.
- **Cost**—Low.

4.4.1.5.3 Summary of Ex Situ Treatment Process Options

Currently the chemicals at LHAAP-29 that are considered to potentially require treatment are the explosives in soil and sediment (potential characteristic hazardous waste). Perchlorate contaminated soils have not been considered for ex situ treatment since it is non-hazardous. The thermal treatment option is effective for permanent destruction of explosives in the soil and is carried forward for consideration. Biological treatment by composting is less developed for LHAAP-29 conditions and is removed from further consideration.

4.4.1.6 Disposal

The disposal GRA consists of those technologies that provide for the disposal of removed wastes at new or existing, permitted disposal facilities. Both on-site and off-site facilities are evaluated. A selection of on-site facilities versus off-site facilities is made for developing alternatives.

4.4.1.6.1 Off-Site Disposal

Off-site disposal options include off-site treatment and disposal facilities, a RCRA disposal facility, or an industrial landfill. The selection of the disposal facility depends on the waste characteristics and although all are evaluated here, none are selected to represent other off-site options.

Treatment, Storage, Disposal Facility. A Treatment, Storage, Disposal (TSD) facility is a commercial, permitted, off-site facility that is licensed to treat, store, and/or dispose of a variety of waste streams. There are numerous such facilities all over the country offering broad ranges of treatment options, many of which could effectively treat and dispose of the LHAAP-29 waste and soils. This option would be used if treatment before disposal is needed to meet ARARs.

- **Effectiveness**—A TSD facility is effective at treating and disposing of treated wastes in a permitted, off-site disposal facility.
- **Implementability**—Numerous facilities exist that have and are treating wastes similar to those found at LHAAP-29. These facilities are already permitted and licensed to operate. Wastes have to meet the waste acceptance criteria of the receiving TSD facility.
- **Cost**—Moderate.

RCRA Disposal Facility. This process option consists of any number of existing disposal facilities that use engineered features such as multilayer liners and caps, leachate detection and collection systems, run-on/-off controls, and intrusion barriers to isolate wastes from human and environmental receptors.

- **Effectiveness**—Disposal involves permanent disposition of the RCRA-generated contaminated soil in a manner that protects human health and the environment. Off-

site disposal would include the transportation of excavated soils to an approved and licensed facility.

- **Implementability**—Implementation is moderate if the waste acceptance criteria can be met.
- **Cost**—Moderate.

Industrial Landfill. An existing industrial landfill can be used to dispose of that debris or refuse that is not a RCRA waste or has been decontaminated to acceptable levels. Such a facility is a Class II lined facility permitted to receive industrial, commercial, institutional, land-clearing, and construction/demolition waste. The facility does not accept RCRA-hazardous waste or free liquids. This option would be used to dispose of waste that is considered hazardous to human health and the environment but is not a RCRA-hazardous waste.

- **Effectiveness**—Industrial landfills are effective in isolating low hazard wastes from the environment and human receptors because the waste acceptance criteria severely restrict the type and concentrations of waste that may be disposed.
- **Implementability**—Disposal of the excavated clean wastes or treated wastes would involve transportation and compliance with waste acceptance criteria.
- **Cost**—Moderate.

4.4.1.6.2 On-Site Disposal

On-site consolidation is considered as the technology process option for on-site disposal.

Consolidation. Consolidation involves placing treated LHAAP-29 soil and sediment back into LHAAP areas. The waste is excavated, partially treated on the site if needed, and then placed elsewhere on LHAAP. The contaminants in the treated waste would have to have been rendered immobile, making the treated waste better suited for placement. This option precludes the need to transport the treated waste to an off-site disposal facility. A single or multilayer cap would then be placed over the waste. If the waste is fully treated, no special disposal process option is needed.

- **Effectiveness**—Consolidation is effective in isolating the very low hazard wastes from human receptors and the environment. It can limit the area requiring long-term institutional controls.
- **Implementability**—Consolidation is used at other hazardous waste sites around the country where off-site disposal options are unavailable or undesirable and where the continued on-site presence of treated waste is not problematic. Given the potential future land uses at the LHAAP, there may be regulatory and public reluctance to moving the waste around the LHAAP.
- **Cost**—Low compared to off-site disposal.

4.4.1.6.3 *Summary of Disposal Process Options*

All off-site disposal process options are carried forward for additional consideration until waste streams and volumes are more clearly identified in the alternative development process. The on-site disposal option of consolidation is not retained because of the potential regulatory and public concerns about leaving waste on the site after having already removed it, the potential future land uses, and the widespread availability of off-site treatment and disposal facilities.

4.4.1.7 *Summary of Representative Soil/Sediment Process Options*

Figure 4-3 is presented to illustrate the process options that have been selected for remedial alternative development for soils at LHAAP-29. The following remedial alternatives are developed from the retained representative GRAs, technologies or process options:

- No action
- Removal, off-site disposal
- Plug and abandon pipe lines

Detailed analyses of these remedial alternatives are included in **Section 5.0**.

4.4.2 *Groundwater*

In the following subsections, process options are evaluated to address shallow groundwater contaminated with VOCs, explosives and perchlorate; and intermediate groundwater contaminated with MC.

4.4.2.1 *No Action*

The “no action” process option provides no groundwater remedial activities. No monitoring of the groundwater or surface water conditions occurs under this process option. This process option is retained as a baseline with which other remediation alternatives are compared.

- **Effectiveness**—Without access controls or remediation, the groundwater from LHAAP-29 could result in a future unacceptable risk to humans if the groundwater is ingested.
- **Implementability**—No implementation is required.
- **Cost**—None.

4.4.2.2 *Land Use Controls*

This LUC process option would be implemented to regulate access and use of the contaminated groundwater at LHAAP-29. The U.S. Army will perform notification of industrial/recreational use which will accompany all transfer documents and will be recorded in the Harrison County Courthouse. Five-Year Reviews will be performed to document that the land use remains consistent with the industrial/recreational exposure scenario evaluated in the risk assessment.

4.4.2.2.1 Access Controls

Access controls would be implemented to regulate access to the groundwater. The process options for access controls include covenants/deed restrictions, administrative controls, and physical mechanisms.

Covenants/Deed Restrictions. Restrictions to the groundwater can be accomplished through modifications to the property deed or agreements about land use. Legal restrictions can be placed on the installation of groundwater extraction wells not only to prevent access to the contamination, but also to minimize the possibility of moving the contamination toward a future user. A recordation of the LUCs (including restriction to groundwater use) will accompany the transfer documentation from the U.S. Army to the USFWS. Deed restrictions would be needed only if the U.S. Army releases the property to a non-federal entity. These restrictions are effective only as long as the property owners and local authorities enforce them. The U.S. Army is ultimately responsible for the enforcement of the LUCs.

- **Effectiveness** – Covenants/deed restrictions are effective, if enforced, in controlling human activities such as potable well construction. These actions can limit or prevent exposure to contaminants remaining on the site after remediation and can be implemented on a temporary basis. The 5-year reviews will ensure that the covenants/deed restrictions are enforced and remain effective.
- **Implementability** – These options can be readily implemented.
- **Cost** – Low.

Administrative Controls. Administrative controls consist of the use of training or procedures to limit access to the site and reduce the risk to human health posed by site contamination at LHAAP-29. These measures may include internal notices and site inspections to serve as a reminder of the existence of LUCs, a site approval process to review land-use changes at LHAAP-29 to ensure the LUCs are followed, training of site personnel regarding the existence and care of the LUCs, and regular inspection and maintenance of the LUCs. These are controls the U.S. Army can use while it maintains control of the site.

- **Effectiveness** – Administrative controls are effective in controlling human intrusion into contaminated areas during and after remediation. The training required for access to the site limits potential exposure to the contaminated groundwater. Administrative controls can be used in conjunction with physical mechanisms and deed restrictions. This option is effective only while LUCs are maintained.
- **Implementability** – Training and procedures are readily available and implemented. They may need to be modified for LHAAP.
- **Cost** – Low.

Physical Mechanisms. Physical mechanisms include various engineered remedies to contain or reduce contamination and/or physical barriers intended to limit access to property, such as fences or signs. It is anticipated that covenants and administrative controls will be adequate to control access to the contaminated groundwater and physical mechanisms will not be required.

4.4.2.2.2 *Monitoring*

Monitoring and surveillance are used to assess the performance of remedial actions and verify compliance with the established RAOs. Process options for monitoring are physical surveillance and long-term media monitoring.

Physical Surveillance. Visual and physical inspections of engineered remedial action components can detect physical changes (e.g., iron deposition and pipeline cracks) that may ultimately lead to the failure or unsatisfactory performance of that component. Repairs and/or revised maintenance activities can be implemented as a result of these inspections.

- **Effectiveness** – Physical surveillance is effective in determining the continued integrity of engineered systems and the need for repairs and/or replacement. Physical surveillance needs to be used with contaminant monitoring to assess the impact of integrity failure.
- **Implementability** – Physical surveillance is easily implemented and requires experienced, but readily available personnel to make regular visits to the site for inspections.
- **Cost** – Low.

Long-Term Media Monitoring. Environmental media (e.g., groundwater) can be monitored after the implementation of the remedial action to determine the effect the remedy has had on the level of contamination. Long-term media monitoring can detect a potential failure of the action to meet the RAOs. Monitoring can also be used to detect changes in expected site conditions or changes in the expected effectiveness of the remedy, and indicate whether additional actions should be implemented.

- **Effectiveness** – Long-term media monitoring would be successful in evaluating the effectiveness of a remedial alternative. The effectiveness of the monitoring system depends on the design of the monitoring plan.
- **Implementability** – Equipment and personnel are readily available. The site is readily accessible, and most monitoring techniques have already been implemented at LHAAP. Multiple groundwater-monitoring wells are already in place, and there is a reasonable baseline of groundwater conditions.
- **Cost** – Moderate due to labor and analytical costs.

4.4.2.2.3 *Summary of Land Use Controls Process Options*

Covenants, administrative controls, physical surveillance, and long-term media monitoring are carried forward as representative process options for the LUCs GRA. Notification of industrial/recreational use will accompany all transfer documents and will be recorded in the Harrison County Courthouse. The covenants would only be used if the U.S. Army releases the land to a non-federal entity. All of these process options could be combined with other process options to meet the RAOs.

4.4.2.3 *Removal*

The removal GRA consists of technologies that remove groundwater to either relocate it or prepare it for treatment. The removal technology considered is groundwater collection/removal.

4.4.2.3.1 *Groundwater Collection/Removal*

Groundwater collection and removal is accomplished by either extraction wells, interception trenches, or horizontal wells.

Extraction Wells. These are vertically installed wells designed to collect and extract clean or contaminated groundwater to contain a plume or to reduce contaminant mass in the plume.

- **Effectiveness**—Extraction wells are considered the most effective groundwater removal technology applicable over a wide range of site conditions. However, proper locations need to be selected to provide for effective extraction and long-term operation.
- **Implementability**—This process is the single most commonly used method to remove groundwater in a very wide range of conditions. Some site predesign characterization may be needed to site new wells. Extraction wells are easy to install at all depths that might be required at LHAAP-29. Existing monitoring wells at LHAAP-29 could be converted to extraction wells.
- **Cost**—Low to moderate.

Interception Trenches. An interception trench is a high permeability subsurface trench that collects contaminated groundwater. It is constructed and operates very much like a vertical French drain with the exception that the collected groundwater is actively pumped from the trench for ex-situ treatment. The trench can be installed across the entire width of a shallow plume to more effectively capture contaminated groundwater.

- **Effectiveness**—Interception trenches are very effective at collecting groundwater. The trench functions like a continuous line of extraction wells. The trenches are also only applicable to shallow zone contamination.
- **Implementability**—Interception trenches are relatively easy to install with conventional construction equipment. The process requires long-term maintenance to

ensure that the permeable media and collection piping do not become clogged. Interception trenches are difficult to install at depths to intercept the intermediate flow zone.

- **Cost**—Moderate.

Horizontal Wells. Horizontal wells are similar to vertical wells with the exception that they are installed horizontally and are typically screened their entire length. They function like drains and offer a water removal capability that exceeds that of a similarly sized vertical well. Horizontal wells could be installed under source areas to remove contaminated groundwater or collect migrating leachate.

- **Effectiveness**—Horizontal wells are very effective at removing large volumes of contaminated groundwater in applications where vertical wells cannot be used. Wells up to 12 inches in diameter and 10–500 feet deep can be installed over 1,000-foot lengths. A single horizontal well is generally equivalent to five vertical wells in sandy soil and ten vertical wells in clayey soil.
- **Implementability**—Although this process is commonly used in the oil industry, it is still in the demonstration phase in environmental restoration. It would likely be used underneath a source area to collect contaminated groundwater or leachate.
- **Cost**—High.

4.4.2.3.2 *Summary of Removal Process Options*

Horizontal wells are not retained as a representative groundwater removal process option because of their limited use in environmental restoration actions and because of their high costs. Interception trenches are effective at removing groundwater though typically at a higher cost than extraction wells. Because extraction well systems are flexible, robust, and effective in a wide range of hydrogeologic conditions, the extraction well process option will be retained for remedial alternative development in this FS. This option may be used to extract the localized, highly contaminated groundwater from the intermediate zone. Interception trenches could be considered during the implementation of the remedial action, should the results of pre-design studies warrant their use.

4.4.2.4 *In Situ Treatment*

In situ treatment technologies provide varying levels of groundwater treatment without prior removal of the groundwater, and reduce the mobility or toxicity of the contaminants in groundwater. The in situ treatment technologies under consideration are physical/chemical and biological treatments.

4.4.2.4.1 Physical/Chemical Treatment

MNA, air sparging/soil vapor extraction, in situ oxidation, and permeable reactive barriers are process options considered potentially applicable to the groundwater at LHAAP-29.

Monitored Natural Attenuation. MNA is a remedial process option that will achieve the cleanup levels over time. Natural subsurface processes such as dilution, volatilization, biodegradation, adsorption, and chemical reactions with subsurface materials are monitored to confirm their progress in reducing contaminant concentrations. **Appendix C** provides an evaluation of the ongoing natural attenuation at LHAAP.

The VOCs and perchlorate are amenable to MNA.

- **Effectiveness**—MNA is considered under CERCLA on a case-by-case basis. USEPA guidance has been developed to aid in the selection of this process option for VOCs. MNA has been selected for a number of CERCLA sites. MNA is effective when source term releases have been mitigated, off-site releases of contaminants at unacceptable levels are not occurring, and it can be demonstrated that natural attenuation mechanisms are occurring. Regular monitoring must be conducted throughout the process to confirm that attenuation is occurring in accordance with cleanup objectives. The MNA evaluation for LHAAP-29 (see **Appendix C**) demonstrated that natural attenuation was occurring and is effectively controlling COCs in the shallow groundwater zone. Vinyl chloride, a common degradation product of TCE has been detected in the intermediate zone at well 29WW16 where the highest VOC concentrations have been detected indicating that natural attenuation is occurring. However, the high MC concentration at 29WW16 (7,110,000 µg/L) exceeds the tolerant range for microorganism activities and limits the effectiveness of the natural attenuation in the intermediate zone.
- **Implementability**—Significant groundwater sampling and analyses must be performed to confirm that conditions are suitable for natural attenuation and to establish a monitoring network. It must also be confirmed that additional source releases and unacceptable off-site releases are not occurring.
- **Cost**—Low to moderate.

Air Sparging/Soil Vapor Extraction. This process option is designed to remove VOCs from the groundwater by volatilizing these contaminants through the introduction of air. Air is introduced into the groundwater, assisting in the volatilization of those organics in solution in the groundwater. Extraction wells are installed into the vadose zone and a vacuum is drawn on these wells. The extraction system draws off the organic-laden air that was bubbled through the groundwater in addition to any vapors that exist in the soil pore spaces. The volatilized contaminants can then be drawn from these extraction wells and treated. This process can be used in those areas where VOCs exist in the groundwater and the vadose zone above this groundwater is relatively permeable.

- **Effectiveness**—This process is very effective on highly volatile contaminants (e.g., TCE) and highly permeable formations. It is incompatible with certain soil types, and high humic content inhibits volatilization of contaminants. Implementation at LHAAP-29 is complicated by high clay content soil that may limit the effectiveness of air sparging by retarding the movement of air and vapors through the soil column. The presence of discontinuous high-permeability zones can result in preferential air flow paths, limiting the effectiveness.
- **Implementability**—Vapor extraction and air sparge equipment is readily available and commercial vendors are available to design and operate these systems. This process has been used at many hazardous waste sites in relatively homogeneous media. Organics that are removed from the vapor extraction wells require ex situ treatment. Site characterization and modeling are required to determine the proper location of the injection and extraction wells and extraction rates.
- **Cost**—Low to moderate.

In Situ Oxidation. Contaminated media are treated through the addition of oxidizers, such as potassium permanganate, hydrogen peroxide or activated persulfate, which convert the contaminants to a less mobile or toxic form. This process option is applicable to VOCs such as MC and TCE. A treatability study was conducted at LHAAP-29 to evaluate the effectiveness of in situ chemical oxidation (see **Appendix B**) using activated sodium persulfate to treat the MC and concluded that combined heat and alkaline activated persulfate oxidation appeared to be the best treatment option.

- **Effectiveness**—In situ oxidation is effective on contaminants in a relatively homogeneous and porous medium. The approximately 17 to 45-foot clay to silty-clay layer between the shallow and the intermediate zones constitutes a barrier that will keep the passive reduction process of the shallow zone from being affected by the oxidative process occurring in the intermediate zone. Based on the treatability study (see **Appendix B**), combined heat (40°C) and alkaline persulfate oxidation appeared to be the best treatment option of the MC in the intermediate zone; however, the long-term effectiveness is uncertain as a change in chemistry could mobilize or change the chemical behavior of the previously oxidized or reduced constituents. Chemical oxidation is most effective for VOCs (particularly TCE) and is considered a suitable approach for the primary COC at LHAAP-29, MC. Chemical oxidation is not effective for treatment of chlorinated alkanes such as 1,2-DCA.
- **Implementability**—This process option may be difficult to implement in situ because of concerns regarding delivery and sufficient exposure of the contaminants to the chemical agents. An additional concern is the release of excess reactants or byproducts to the environment. There have been limited applications of these processes, which are generally more readily implemented in the ex situ mode. A recent USEPA evaluation by their Technology Innovation Office concluded that the application of in situ oxidation is highly dependent upon the delivery system.
- **Cost**—Low to moderate.

Permeable Reactive Barriers. Permeable reactive barriers can be a physical/chemical or biological treatment option. A reactive barrier or gate is a permeable wall containing reactive media that is constructed across the path of a contaminant plume. As contaminated water passes through the wall, the contaminants are removed or degraded, allowing uncontaminated water to emerge on the downgradient side. Reactive barriers are usually installed through adaptation of conventional construction methods for impermeable barriers such as open trenches, polymer slurry trenches, and overlapping caissons. Reactive barriers may be constructed from a variety of materials including zero-valence metals (ZVM), granulated activated carbon (GAC), biological material, and other sorbents. These materials treat contaminants through a combination of mechanisms, including adsorption, chemical reduction, and biodegradation.

ZVM works by chemically reducing contaminants, thus either causing their degradation or limiting their mobility. A variety of metals can be used as reducing agents such as silver, gold, palladium, copper, zinc, aluminum, manganese, and iron. In situ reactive gates require high volumes of ZVM, making the application of precious metals such as silver, gold, and palladium impractical. The most practical metal for this technology is iron, because of its relative abundance, low cost, and low toxicity. However, more effective and more expensive forms of iron (palladized iron) may be necessary, depending on the contaminant.

GAC is the most widely used adsorbent and filter medium because of its effectiveness on a variety of contaminants. GAC is chemically stable and will not produce secondary contaminants. The surface area of the carbon and the pH of the solution flowing through the medium determine the rate and effectiveness of GAC in adsorbing contaminants. In addition, different contaminants are adsorbed according to different ionic natures and kinetics.

- **Effectiveness**—The effectiveness of this process depends greatly on the contaminants, the reactive media, site hydrology, and site geochemistry. Reactive media clogging and exhaustion causes the need for periodic replacement. The gates are generally limited to shallower applications because of the difficulties in installing and monitoring the media at depth. There are concerns over the longevity of the reactive media given uncertain and changing chemical and physical conditions.
- **Implementability**—Permeable reactive barriers require adequate site and contaminant characterization and monitoring to determine effectiveness. This process requires treatability testing before full-scale implementation to determine potential physical and chemical interactions with surrounding materials, location within the aquifer, and criteria for replacement. Long-term maintenance requirements may be significant.
- **Cost**—Moderate.

4.4.2.4.2 *Biological Treatment*

Biological treatment process options use living organisms such as bacteria or fungi to detoxify or immobilize contaminants in waste. These process options are primarily used to convert organic contaminants into nontoxic products.

Enhanced Bioremediation. This general process option covers a wide range of individual biological process options that rely on microbial transformation of organic contaminants under aerobic or anaerobic conditions into benign forms to obtain energy or carbon. Excessively high concentrations of contaminants could be toxic to microbes. Many organic contaminants, including some of the COCs at LHAAP-29, can be biodegraded under anaerobic (without oxygen) conditions. The activity of microorganisms is greatly affected by pH, redox potential, temperature, oxygen content, and most importantly, nutrient availability. These conditions can be manipulated to achieve optimal conditions for microbial activity, accelerating the biodegradation of the target contaminants. The conditions are manipulated through the addition of nutrients or electron acceptors or donors.

- **Effectiveness**—In situ biodegradation is effective in either low oxygen conditions or high oxygen and methane conditions in a permeable media that enhances the continuing delivery of nutrients to the bacteria. The primary challenge for in situ biological treatment is to effectively introduce the bacteria and nutrients to the affected areas and ensure adequate mixing and contact. The rate of destruction is typically slower than other competing processes, but fewer and less toxic byproducts result. The vast amount of chloride ions that would be produced through enhanced bioremediation would likely reduce the effectiveness of biodegradation.
- **Implementability**—Enhancing the biological activity may be difficult in some of the low permeability soil at LHAAP-29 because of complications associated with the delivery of nutrients and oxygen. Equipment and expertise are readily available, but significant treatability testing would be required.
- **Cost**—Low to moderate.

4.4.2.4.3 *Summary of In Situ Treatment Process Options*

There are numerous in situ groundwater treatment process options available. In the shallow zone, a significant reduction in perchlorate, explosives and VOC concentrations detected during the various rounds of groundwater monitoring indicates that natural attenuation is effectively occurring. However, that is not currently the case for the intermediate groundwater zone at LHAAP-29 primarily due to the high MC concentration at well location 29WW16. Therefore, MNA alone is not expected to be effective in the intermediate zone. MNA is retained as a remediation option in the shallow zone and for further consideration for the post-treatment period in the intermediate zone. The effectiveness of the air sparging/soil vapor extraction and permeable reactive barrier process options for treatment of LHAAP-29 groundwater may be limited by site geology or hydraulic conditions, contaminant characteristics, or the degree of

required long-term maintenance. In situ chemical oxidation is considered a fast and efficient process with respect to the COCs in LHAAP-29 groundwater and a treatability study performed for the groundwater at the site identified this option as a viable alternative and in situ oxidation will, therefore, be retained for remedial alternative development. Although enhanced bioremediation will not be retained for remedial alternative development due to the excessive MC concentrations which could ultimately be toxic to the microbes introduced through the bioremediation process; this option may be considered an alternative to chemical oxidation once MC concentrations are reduced.

4.4.2.5 *Ex Situ Treatment*

Ex situ treatment technologies provide varying levels of water treatment following extraction or collection of the water. These technologies are applied to reduce the volume, mobility, or toxicity of recovered groundwater. Although ex situ treatment technologies considered are physical/chemical, thermal, and biological, they have been grouped into two process options under an on-site treatment technology – the existing treatment system and a new mobile or skid-mounted system near the extraction point.

4.4.2.5.1 *New Treatment Plant*

A small, skid-mounted or mobile treatment plant could be built near the point of groundwater extraction. The treatment system would be designed for removal of the COCs from the extracted groundwater. GAC or air stripping could remove the COCs. The new treatment plant may require a pretreatment system (e.g., precipitation) if iron and other interfering metals are present in the groundwater.

- **Effectiveness**—All of the considered technologies are proven effective and are even used at an existing treatment plant at LHAAP. Smaller units have less operational flexibility and may expect deviations more often. However, this option would be effective.
- **Implementability**—The implementation of this option is more difficult than that of the existing treatment plant. A few studies would be needed to design the plant to meet the site conditions. This option is still reasonably easy to implement.
- **Cost**—Moderate. The capital costs of this option are considerably greater than that of the existing plant. However, there is a potential that the operational costs could be minimized.

4.4.2.5.2 *Burning Ground No. 3 Groundwater Treatment Plant*

This facility, which is currently processing contaminated groundwater from other LHAAP sites (LHAAP-18/24 and LHAAP-16), includes unit operations such as neutralization, precipitation, and air stripping. The effluent from the plant is discharged to Harrison Bayou.

- **Effectiveness**—The existing plant is currently treating groundwater. The hydraulic capacity of the plant has not been met yet, so additional flow could be effectively handled. The discharge requirements are routinely met, indicating an effective operation.
- **Implementability**—The existing plant is already operational. It is operating below current design capacity. Depending on the composition of the site water sent to the plant, it is possible that no revisions to the plant would be necessary. However, LHAAP-29 is located approximately 1.5 miles from the existing plant and that distance makes the implementability of direct pumping to the plant impractical. A series of on-site holding tanks would be required.
- **Cost**—Frequent transport of the contaminated groundwater from on-site holding tanks to the plant makes this option cost moderate to high in comparison to other alternatives.

4.4.2.5.3 *Summary of Ex Situ Treatment Process Options*

The utilization of the existing LHAAP groundwater treatment plant will be retained for remedial alternative development. It is already effectively operational, and the capital costs for construction of the plant have already been spent. Currently, groundwater from other LHAAP sites provides the majority of the water that is treated by the plant. Because of its proven effectiveness and lower costs, the current treatment system is used to develop alternatives.

4.4.2.6 *Summary of Representative Groundwater Process Options*

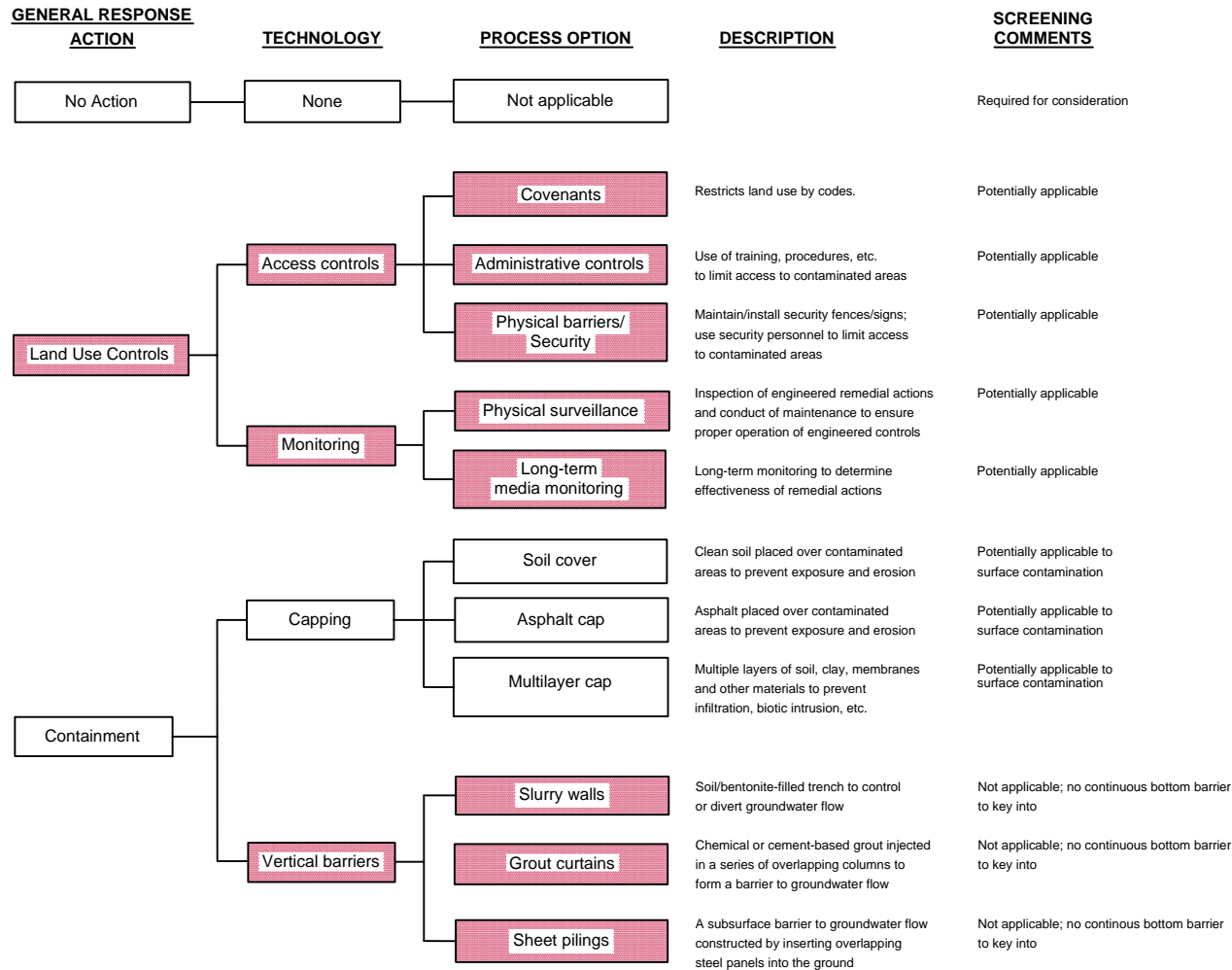
Figure 4-4 is presented to illustrate the process options that have been selected for remedial alternative development. The following representative GRAs, technologies or process options are retained.



- No action
- LUCs
- Groundwater extraction and follow-up in situ chemical oxidation in the intermediate groundwater zone
- Groundwater extraction and ex situ treatment
- MNA (shallow groundwater zone and intermediate groundwater zone after in situ or ex situ treatment)


Development of the remedial alternatives is included in **Section 5.0**.

PLOT DATE: 1/30/06
 FORMAT REVISION 5/13/02

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	STOUGHTON, MA	D. CRISPO	01/17/06	S. WATSON	03/09/09
					P. SRIVASTAV	03/09/09
						117591-A41



 Process option screened out
 Process option retained



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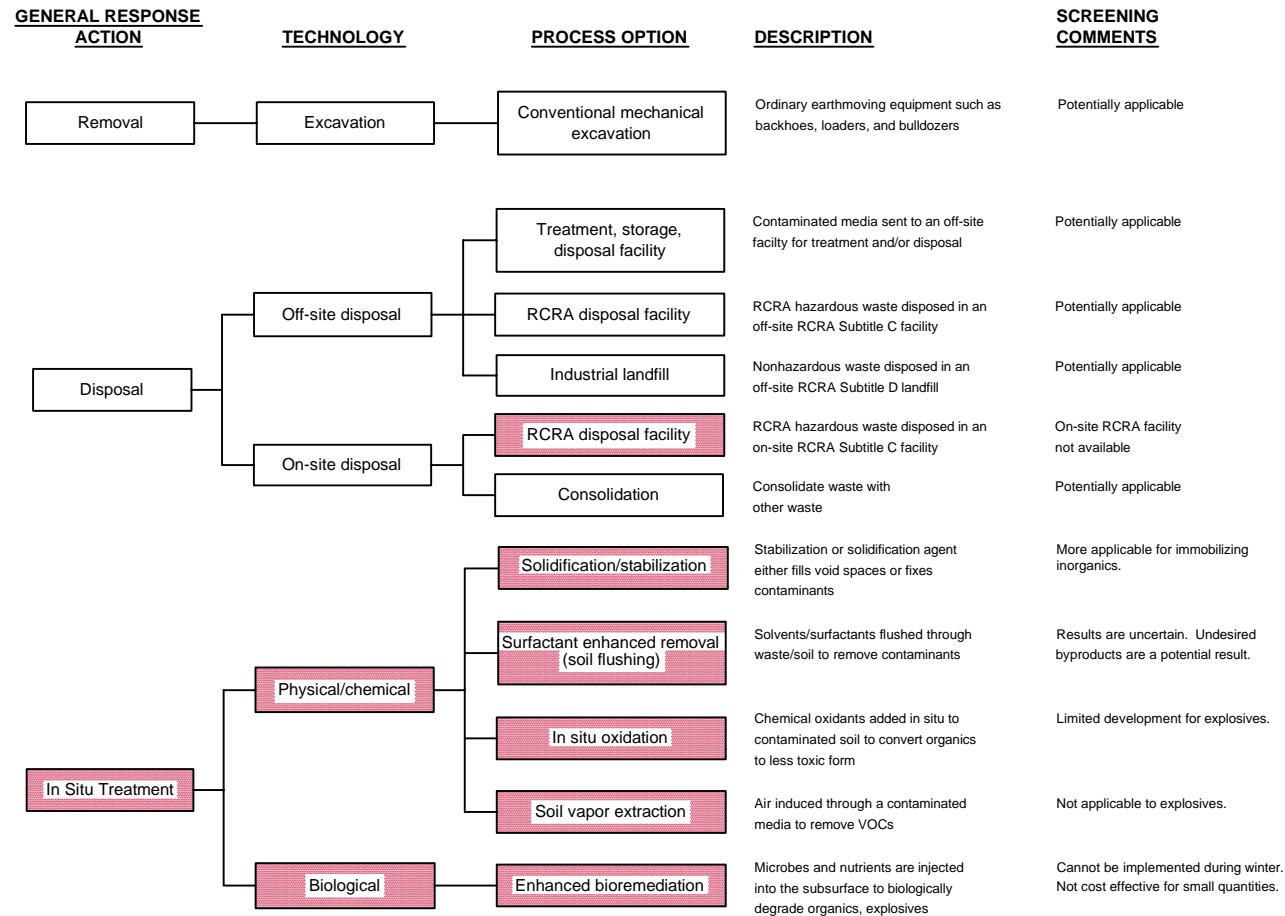
Figure 4-1 (1 of 3)



Soil Technology Screening
 LHAAP-29 Feasibility Study


Longhorn Army Ammunition Plant
 Karnack, Texas

PLOT DATE: 10/16/08
 FORMAT REVISION 5/13/02

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	STOUGHTON, MA	D. CRISPO	R. DUFFIELD	P. SRIVASTAV	117591-A34



 Process option screened out
 Process option retained



U.S. Army Corps of Engineers
 Tulsa District
 Tulsa, Oklahoma

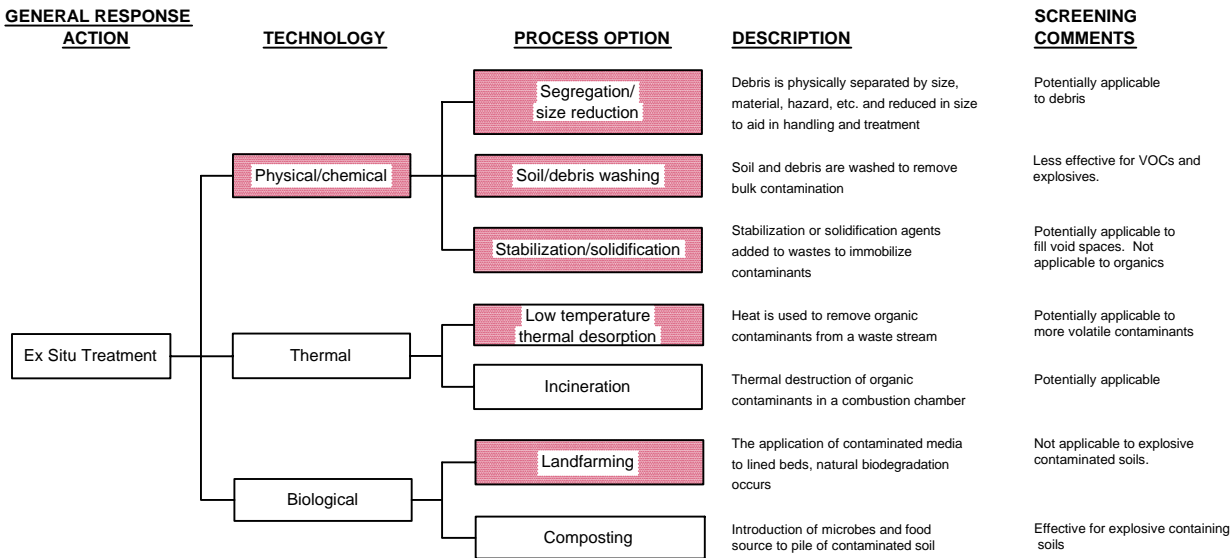
Figure 4-1 (2 of 3)



Soil Technology Screening
LHAAP-29 Feasibility Study


Longhorn Army Ammunition Plant
 Karnack, Texas

PLOT DATE: 10/16/08
 FORMAT REVISION 5/13/02

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	STOUGHTON, MA	D. CRISPO	R. DUFFIELD	P. SRIVASTAV	117591-A35



 Process option screened out
 Process option retained



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 Tulsa, Oklahoma

Figure 4-1 (3 of 3)

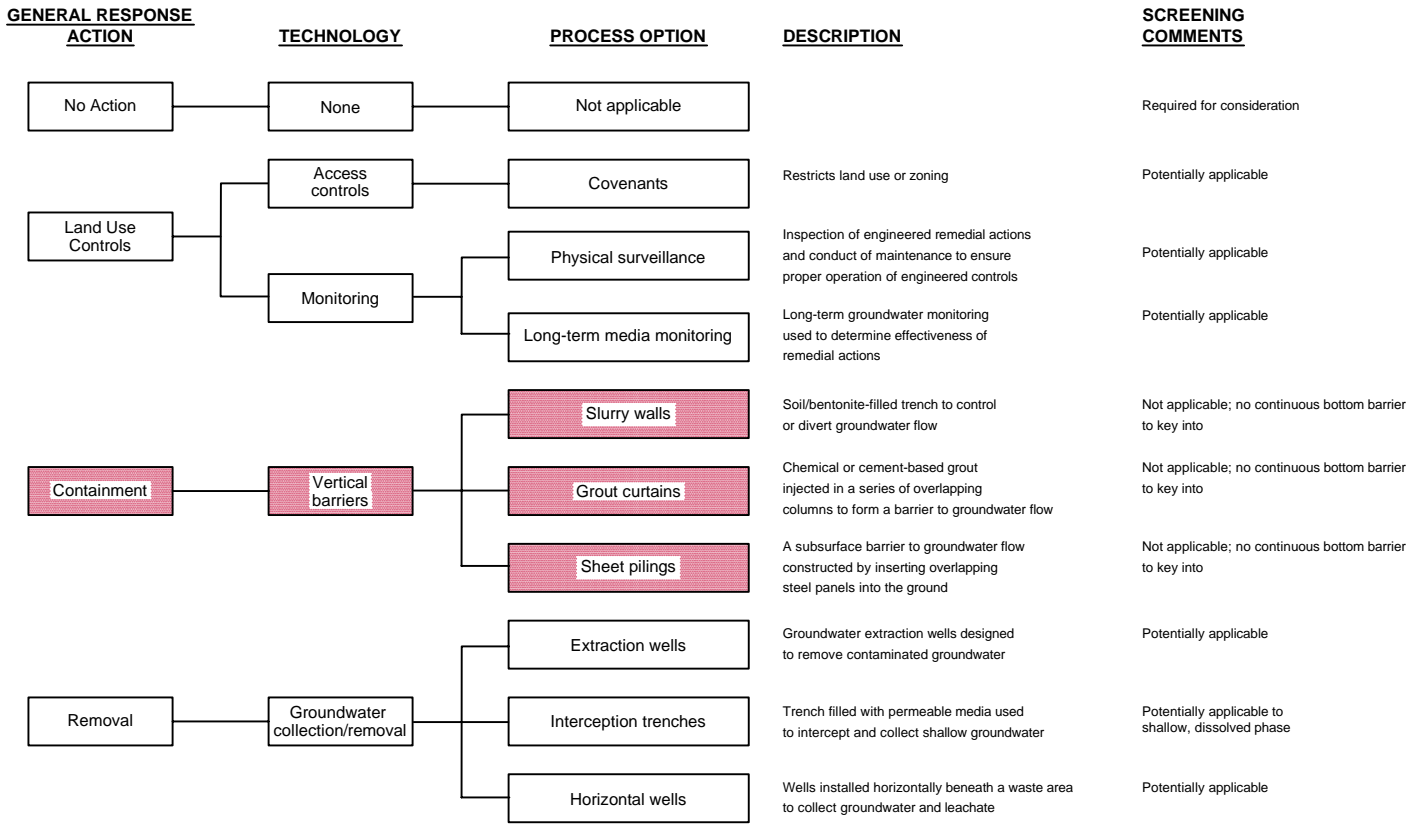
Soil Technology Screening



LHAAP-29 Feasibility Study


Longhorn Army Ammunition Plant
 Karnack, Texas

PLOT DATE: 10/16/08
 FORMAT REVISION 5/13/02

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	STOUGHTON, MA	D. CRISPO	R. DUFFIELD	P. SRIVASTAV	117591-A36



 Process option screened out
 Process option retained



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 Tulsa, Oklahoma

Figure 4-2 (1 of 2)

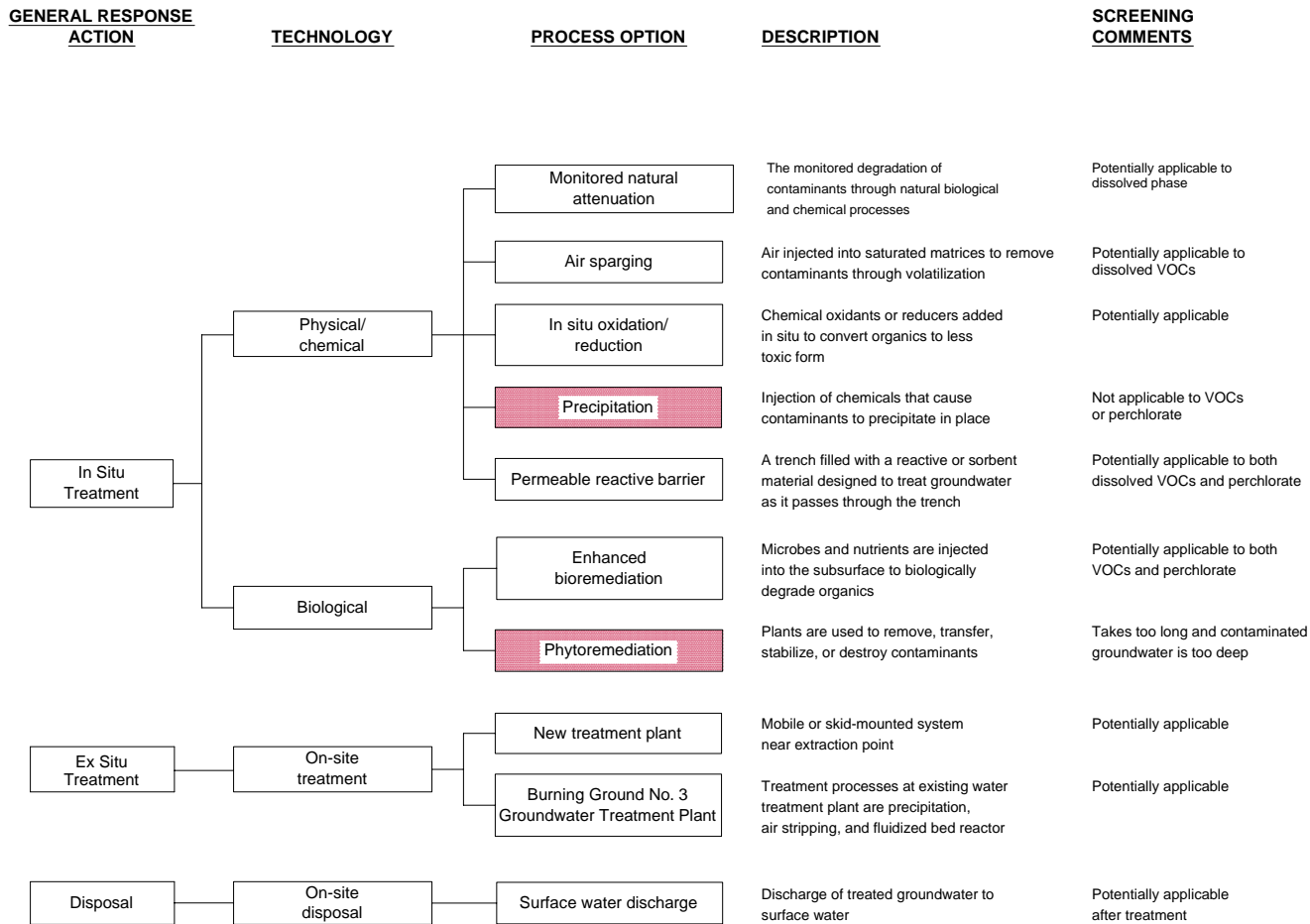
Groundwater Technology Screening


LHAAP-29 Feasibility Study


Longhorn Army Ammunition Plant
 Karnack, Texas


PLOT DATE: 10/16/08
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IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
---	---	STOUGHTON, MA	D. CRISPO	01/17/06	R. DUFFIELD	10/16/09	P. SRIVASTAV	03/09/09	117591-A37



 Process option screened out

 Process option retained



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Figure 4-2 (2 of 2)

Groundwater Technology Screening

LHAAP-29 Feasibility Study


Longhorn Army Ammunition Plant
 Karnack, Texas

PLOT DATE: 1/30/06
 FORMAT REVISION 5/13/02

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	STOUGHTON, MA	D. CRISPO	S. WATSON	P. SRIVASTAV	117591-A40

GENERAL RESPONSE ACTION	TECHNOLOGY	PROCESS OPTION	EFFECTIVENESS	IMPLEMENTABILITY	COST
No Action	None	Not applicable	Does not achieve RAOs.	Not acceptable to USEPA	None
Land Use Controls	Access controls	Covenants	Effective as long as property owners and local authorities enforce them. Does not reduce contamination and is not effective to protect groundwater or ecological receptor.	Readily implemented but has legal and authority requirements	Low cost to document land use restrictions
		Administrative controls	Effective as long as LUCs are implemented. Does not reduce contamination and is not effective to protect groundwater or ecological receptor.	Training and procedures are available and readily implemented.	Low cost to implement training and routine inspection and maintenance of LUCs.
		Physical barriers/ Security	Effective as long as physical mechanisms are maintained. Does not reduce contamination and is not effective to protect groundwater or ecological receptor.	Readily implemented. Fencing and signs are commercially available items.	Low cost to install fences and signage.
	Monitoring	Physical surveillance	Effective but needs to be used with contaminant monitoring to assess impact of integrity failure. Does not reduce contamination and is not effective to protect groundwater or ecological receptor.	Readily implemented but requires experienced persons to make routine inspections.	Low cost to implement; however, depends on frequency of inspections.
		Long-term media monitoring	Effectiveness depends on the design of the monitoring plan. Does not reduce contamination and is not effective to protect groundwater or ecological receptor.	Readily implemented. The site is accessible and groundwater monitoring wells exist onsite.	Moderate costs due to labor and analytical costs.
Containment	Capping	Soil cover	Effective, susceptible to cracking, but has self healing properties. Requires maintenance and long-term monitoring	Easily implemented. Restrictions on future land use in capped areas.	Medium capital, low maintenance.
		Asphalt cap	Effective but susceptible to weathering and cracking. Requires maintenance and long-term monitoring.	Easily implemented. Restrictions on future land use in capped areas.	Medium capital, high maintenance.
		Multilayer cap	Effective, least susceptible to cracking.	Moderate implementability. Restrictions on future land use in capped areas.	High capital, high maintenance.
Removal	Excavation	Conventional mechanical excavation	Effective for permanent removal of contaminants. Removed solids require treatment or disposal.	Easily implemented. Conventional soil removal equipment is widely available.	Medium capital, no maintenance.

- Process option screened out
- Selected representative process option



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Figure 4-3 (1 of 2)
**Selection of Representative
 Soil Process Options**
LHAAP-29 Feasibility Study
 Longhorn Army Ammunition Plant
 Karnack, Texas

PLOT DATE: 10/16/08
 FORMAT REVISION 5/13/02

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
---	---	STOUGHTON, MA	D. CRISPO	01/17/06	R. DUFFIELD	10/16/08	P. SRIVASTAV	03/09/09	117591-A38

GENERAL RESPONSE
ACTION

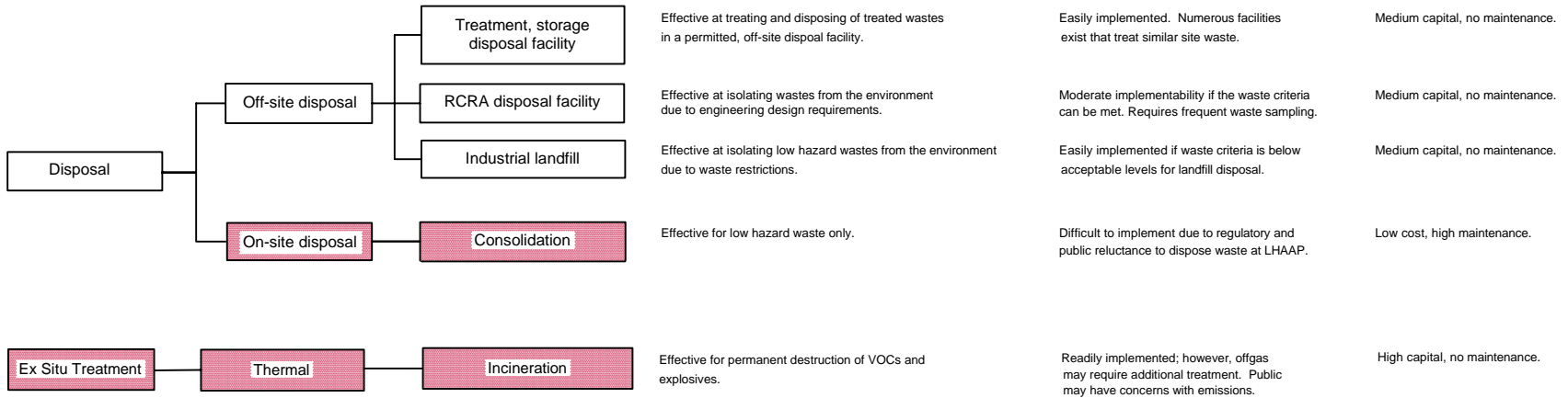
TECHNOLOGY

PROCESS OPTION


EFFECTIVENESS

IMPLEMENTABILITY

COST



- Process option screened out
- Selected representative process option

	U.S. Army Corps of Engineers Tulsa District Tulsa, Oklahoma
Figure 4-3 (2 of 2) Selection of Representative Soil Process Options LHAAP-29 Feasibility Study Longhorn Army Ammunition Plant Karnack, Texas	

PLOT DATE: 1/30/06
FORMAT REVISION 5/13/02

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
---	---	STOUGHTON, MA	D. CRISPO	03/20/06	R. DUFFIELD	10/16/09	P. SRIVASTAV	03/09/09	117591-A44

GENERAL RESPONSE
ACTION

TECHNOLOGY

PROCESS OPTION

EFFECTIVENESS

IMPLEMENTABILITY

COST



Does not achieve RAOs.

Not acceptable to USEPA

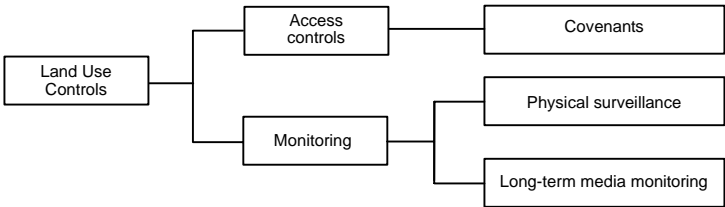
None



Effective when sources have been mitigated and a determination that MNA is occurring.

Requires significant groundwater sampling. No significant detection of degradation products (cis-1,2-DCE or vinyl chloride).

Moderate cost due to sample requirements.



Effective as long as property owners and local authorities enforce them. Does not reduce contamination.

Readily implemented but has legal and authority requirements

Low cost to document land use restrictions

Effective but needs to be used with contaminant monitoring to assess impact of integrity failure.

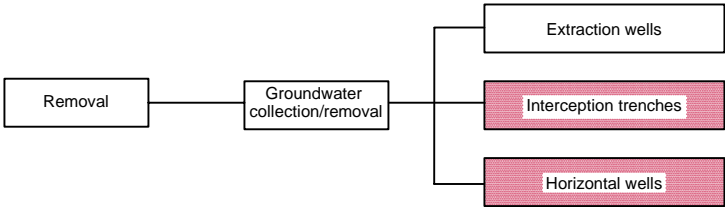
Readily implemented but requires experienced to make routine inspections.

Low cost to implement; however, depends on frequency of inspections.

Effectiveness depends on the design of the monitoring plan.

Readily implemented. The site is accessible and groundwater monitoring wells exist onsite.

Moderate costs due to labor and analytica costs.



Considered most effective groundwater removal method.

Easily implemented. Extraction wells are easy to install and existing wells are easily modified.

Low to moderate capital.

Effective at collecting groundwater in shallow groundwater zone.



Difficult to implement. May be difficult to install and requires long-term maintenance.

Medium capital, high maintenance.

Effective at removing large volumes of contaminated groundwater.

Medium difficulty to implement but this method is still in the demonstration phase in environmental restoration.

High capital, high maintenance.

-  Process option screened out
-  Selected representative process option



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Figure 4-4 (1 of 2)
Selection of Representative
Groundwater Process Options
LHAAP-29 Feasibility Study
Longhorn Army Ammunition Plant
Karnack, Texas

PLOT DATE: 10/16/08
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IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
---	---	STOUGHTON, MA	D.CRISPO	01/17/06	S. WATSON	03/09/09	P. SRIVASTAV	03/09/09	117591-A39

**GENERAL RESPONSE
ACTION**

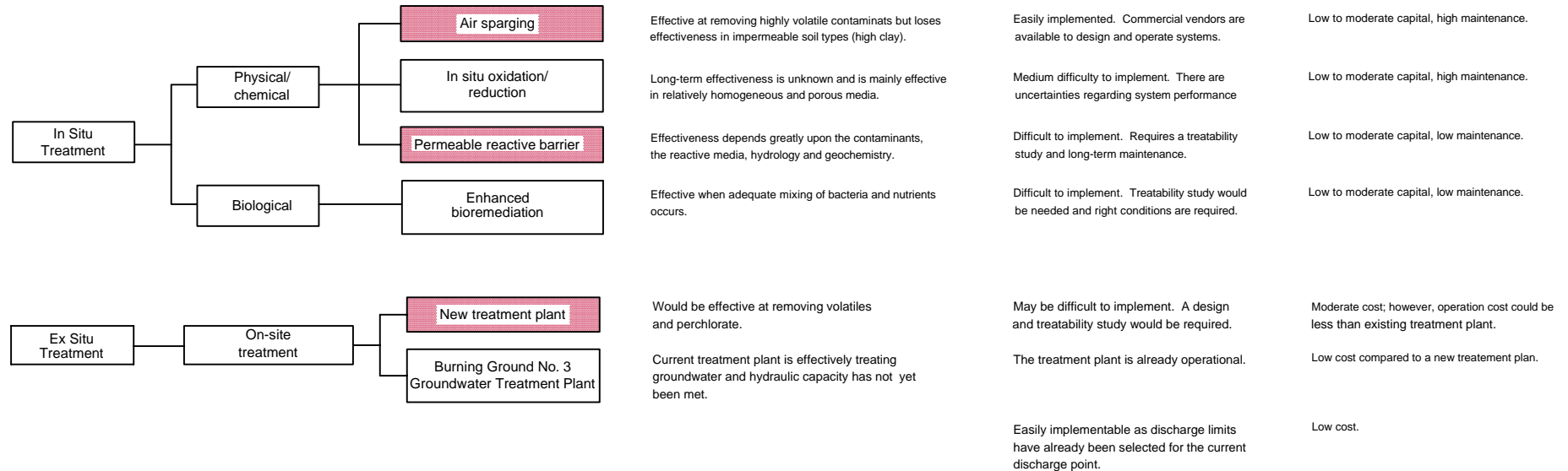
TECHNOLOGY



PROCESS OPTION


EFFECTIVENESS

IMPLEMENTABILITY

COST



 Process option screened out
 Process option retained

	<p>U.S. Army Corps of Engineers Tulsa District Tulsa, Oklahoma</p>
<p>Figure 4-4 (2 of 2) Selection of Representative Groundwater Process Options LHAAP-29 Feasibility Study Longhorn Army Ammunition Plant Karnack, Texas</p>	

5.0 *Development and Description of Alternatives*

Section 5.1 presents the development of a range of alternatives based on the key assumptions regarding site and contaminant conditions (**Section 2.0**), the RAOs and applicable ARARs (**Section 3.0**), and the representative process options (**Section 4.0**). **Section 5.2** presents the detailed description of the alternatives.

5.1 *Development of Alternatives*

5.1.1 *Requirements and Preferences*

The CERCLA process, as defined in the NCP, develops a remedy that protects human health and the environment, complies with ARARs (unless a statutory waiver is justified and granted), is cost-effective, and uses permanent solutions and alternative treatment or resource recovery technologies to the maximum extent practicable. A statutory preference for remedies that would result in permanent and significant decreases in toxicity, mobility, or volume through treatment and provide long-term protection is stated in Section 121 of CERCLA, as amended.

The NCP defines the following preferences in developing remedial action alternatives:

- Use of treatment to address the “principal threats” posed by a site, wherever practical.
- Use of engineering controls, such as containment, for waste that poses a relatively low, long-term threat and for which treatment is not practical.
- Implementation of a combination of actions, as appropriate, to achieve protection of human health and the environment. For example, in appropriate site situations, treatment of principal threats would be combined with engineering controls, such as containment, and LUCs for treatment residuals and untreated waste.
- Use of LUCs, such as drinking water supply controls and covenants, to supplement engineering controls for short- and long-term management to prevent or limit exposures to hazardous substances.
- Selection of an innovative technology when the technology offers the following: the potential for comparable or better treatment performance or implementability, fewer or lesser magnitude adverse impacts than other technologies, or lower costs than demonstrated technologies for similar levels of performance.
- Usable groundwater is expected to be returned to beneficial uses, whenever practicable, within a time frame that is reasonable given the particular circumstances of the site. When such restoration is not practicable, the prevention of further migration of the plume and of exposure to the contaminated groundwater are expected.

These statutory requirements and preferences were given due consideration in the development of alternatives for LHAAP-29.

5.1.2 *Development using Remediation Strategies and Process Options*

The media at LHAAP-29 presenting an unacceptable risk or hazard are groundwater, soil at isolated areas, sediment in the outfall ditch, and solid residue in the cooling water lines and manholes. Thus, the purpose of the remedial alternatives is to present the decision maker with technical and economic options for remediation of soil, sediment, residual contamination in pipe lines, and groundwater at LHAAP-29. Although all of the action alternatives have been designated to achieve the RAOs and the statutory requirements under CERCLA, each alternative must also be sufficiently unique in its strategy and approach that the range of alternatives represents a reasonable spectrum of final site conditions in the view of the decision makers.

The process options that remain after screening were grouped and combined into alternatives to meet the RAOs as indicated on **Table 5-1**.

A number of process options are common to both action alternatives (Alternatives 2 and 3):

- Long-term LUCs to restrict groundwater use are common to all action alternatives. The proposed groundwater remedy for each of the action alternatives necessitates that groundwater LUCs be maintained until cleanup levels are achieved. The LUCs include access controls and monitoring as discussed in **Section 4.4.2.2**.
- The process option for the shallow groundwater is MNA. MNA was evaluated (**Appendix C**) and is a viable option.
- The process option selected for the residual contamination in the lines and manholes is to plug the inlets and outlets. This will minimize contact from hypothetical future maintenance workers and prevent water from infiltrating and transporting contaminants.

5.2 *Description of Remedial Alternatives*

The following sections describe the remedial alternatives in more detail (see **Table 5-1** for a presentation of the components of each alternative). The details included in the alternative descriptions (e.g., quantities and dimensions) support the evaluation in **Section 6.0** and the cost estimate in **Appendix A**. Quantities and dimensions are provided for cost estimating purposes only and may be changed based on the design. Designs and process options other than those considered here may be substituted once the decision on remedial approach is made.

5.2.1 *Alternative 1 - No Action Alternative*

As required by the NCP, the “no action” alternative provides a comparative baseline against which the action alternatives can be evaluated. Under this alternative the source units

(contaminated soil, sediment, and residual contamination in pipe lines) and groundwater would be left “as is,” without implementing any additional containment, removal, treatment, or other mitigating actions. No other actions would be implemented to reduce existing or potential future exposure to human and ecological receptors.

5.2.2 Alternative 2 – Excavation and Off-site Disposal for Soil; Plug Lines; Extraction, In Situ Chemical Oxidation and MNA for Intermediate Zone Groundwater; MNA and LUCs for Shallow Zone Groundwater

The goals of this alternative are to prevent exposure of the hypothetical future maintenance worker to contaminated soil and groundwater and ecological receptors to surface soil/sediment at LHAAP-29. Soil and sediment that have the potential to pose risk to the human or ecological receptor or impact groundwater or surface water will be removed. To eliminate future impact to on-site surface water and groundwater, the TNT wastewater lines and the cooling water lines will be plugged and abandoned in place. The shallow zone and intermediate zone groundwater have contaminants above MCLs or GW-Ind that will be reduced over time to meet the cleanup levels.

Under this scenario, the highest concentration area in the MC plume in the intermediate groundwater zone will be treated. In situ chemical oxidation treatment is proposed. Extraction will be implemented as part of the in situ treatment to physically remove mass and to control the hydraulic gradient. After in situ treatment, natural attenuation will be monitored and evaluated to confirm that contaminant concentrations are being reduced to cleanup levels over time. LUCs would be maintained until the groundwater is returned to beneficial use.

5.2.2.1 Removal of Soil above Cleanup Levels

The recommended removal action consists of excavation of the nitrotoluene and perchlorate-contaminated soil and off-site disposal at a RCRA Subtitle D-permitted landfill. Excavation of the contaminated soil and disposal in a RCRA-permitted landfill will result in the following: 1) removal of contaminated soil that is a potential source of cross-contamination to groundwater, thereby ensuring that groundwater can ultimately be returned to its beneficial uses; 2) removal of soil that is posing risk to ecological receptors; and 3) removal of soil that is a direct risk to the hypothetical future maintenance worker, thereby protecting human health by preventing inhalation, ingestion, and dermal contact with the COCs. The estimated volume of soil to be removed is approximately 3,900 cubic yards and is based on the cleanup levels in **Table 3-4** and the receptor. The excavation locations are highlighted on **Figure 2-1**. The removal of soil contamination will be verified by collecting confirmation samples from the walls and floors of the excavation area and submitting them for laboratory analysis for the COCs of interest. Clean borrow soil will be used as needed to backfill the excavations so they can be graded for proper drainage.

With the removal of the contaminated surface soil and sediment at LHAAP-29, plugging of the former TNT wastewater and cooling water lines and abandoning the manholes associated with the cooling water lines, health and ecological risks as well as the potential migration of soil to surface water and groundwater will be eliminated and long-term operations for soil will not be required.

5.2.2.2 *Plug and Abandon Lines*

The transite TNT wastewater line will be flushed with water to remove visual residue. The rinsate water will be containerized. Appropriate rinsate handling procedures will be followed based on its waste classification. The inlets and outlets of the traniste TNT wastewater line will be plugged with a bentonite slurry mix or equivalent.

The cooling water lines showed no significant contamination except for 2,4-DNT in the solid residue in manholes 8 and 10. The cooling water lines will be inspected to determine if there is contaminated solid residue in the lines adjacent to manholes 8 and 10. An attempt will be made to sample and analyze the residue and water in the cooling water lines as part of the RD phase. If there is not enough residue volume to sample or the concentrations in the sample are less than the GW-Ind (water) or GWP-Ind (solid) and the residue is nonhazardous, the pipe will be plugged and abandoned. No solid residue or liquid will be left in the pipe if the explosive constituents exceed the GWP-Ind (residue), the GW-Ind (water) or the solid or liquid is determined to be hazardous (residue or water). If explosive concentrations are above the GWP-Ind (residue) or GW-Ind (water) or the material is found to be hazardous, the line will be flushed before plugging and abandoning. The rinsate will be characterized for waste handling. The manholes will then be plugged with a bentonite slurry mix or equivalent.

5.2.2.3 *In Situ Chemical Oxidation for Intermediate Zone VOC Groundwater Plume*

In situ chemical oxidation in groundwater is a technology that oxidizes most organic constituents in the saturated zone to carbon dioxide and mineral products. The proposed oxidant is activated persulfate. The persulfate ion ($S_2O_8^{2-}$) is a strong oxidant that reacts with organic compounds primarily by the sulfate anion radical. The persulfate reagent is very soluble in water to concentrations of 30 to 40 percent and the solutions are relatively stable at concentrations as low as 1 to 10 percent. These properties allow for optimum delivery and distribution to the subsurface matrix without being limited by solubility of the oxidant. Persulfate activation by adjusting the pH to alkaline conditions and/or applying heat is effective for chlorinated methanes, such as MC, the primary COC in the groundwater intermediate zone at LHAAP-29. A treatability study was conducted at LHAAP-29 to evaluate the effectiveness of in situ chemical oxidation using activated sodium persulfate to treat the MC and concluded that combined heat and alkaline activated persulfate oxidation appeared to be the best treatment option (**Appendix B**).

In general, the components of the in situ chemical oxidation action include:

- **Installation of injection wells.** Four intermediate zone injection wells (88 feet bgs) will be installed around existing intermediate monitoring well 29WW16, where MC was detected at the highest concentration. The four wells will be arranged in a square with well 29WW16 in the center of the square. The new wells will be spaced approximately 50 feet apart, creating a treatment zone with an aerial coverage of 2,500 square feet. The spacing may be adjusted based on actual field conditions.
- **Injection of oxidation solution.** One pore volume of heat activated (40°C) combined persulfate and sodium hydroxide solution at 60 grams per liter (g/L) and 15 g/L, respectively, will be injected into four wells while simultaneously extracting groundwater from well 29WW16. Temporary piping will be used for the injection array. Based on the estimated volume of the treatment zone (50' × 50' × 40') and a porosity of 25 percent, a total of 25,000 cubic feet (187,000 gallons) of activated persulfate and sodium hydroxide solution will be injected into the subsurface. An estimated 94,000 pounds of persulfate reagent and 23,500 pounds of sodium hydroxide will be injected into the subsurface. A second round of injection may be required if monitoring indicates COCs are not being effectively reduced from the initial round. For costing purposes, it is assumed a second round will be required. If contaminant concentrations do not decrease as anticipated, the method will be modified.
- **Simultaneous extraction of groundwater.** Well 29WW16 will be converted to an extraction well. Prior to conversion, a pump test will be conducted and hydrogeologic parameters will be measured to assess aquifer conditions. Groundwater flow in the vicinity of 29WW16 and the injection wells will be modeled to determine the scope of the modifications needed at 29WW16 and to assess the time required to extract one pore volume.

A temporary piping system will be used to convey the extracted water to three 5,000-gallon on-site storage tanks. The on-site tanks will be interconnected and will be equipped with a high level shut off to the extraction pump. Once every two days, water will be pumped into a tank truck and transported to the LHAAP groundwater treatment plant for treatment and discharge. A 20-foot by 50-foot gravel pad will be prepared for the tanks, and a 6-inch layer of gravel would be placed to upgrade the road to the tanks. The estimated quantities are for costing purposes only and will be revised during the design.

- **Monitor effectiveness.** To monitor the effectiveness of the in situ chemical oxidation, six wells will be monitored biweekly for three sampling events. The six wells will include one new monitoring well, four injection wells, and 29WW16. The effect of the first chemical injection should be evident within a few weeks. It is anticipated that a second injection will be needed after approximately 2 months. Following in situ treatment, groundwater monitoring will be implemented for well 29WW16 and three additional wells to demonstrate continued reductions through MNA.

Based on the Treatability Study (included in **Appendix B**), the MC concentrations will be reduced by approximately 75% through heat-activated persulfate application. MNA will be initiated after the formation has recovered from the oxidation treatment activities.

5.2.2.4 *Monitored Natural Attenuation*

In both the shallow and intermediate groundwater zones, MNA will be used to complete the remediation. MNA will reduce contaminant levels to MCL/GW-Ind concentrations and return these zones to beneficial uses.

The MNA evaluation in **Appendix C** has shown that MNA has been effective in the shallow zone in reducing contaminant concentrations. Based on the findings of that evaluation, the time necessary to return the shallow aquifer is driven by 1,2-DCA, which may require approximately 70 years.

A monitoring program will be developed as part of the remedial design phase and will define the MNA expectations. The objectives of the monitoring program will include the demonstration that MNA is occurring, verification that there has been no unacceptable impact to downgradient receptors, verification that the plume is not expanding, and verification of the attainment of RAOs. The sampling program design will be based on the current plume, seasonal variations, groundwater direction, and velocity. MNA monitoring will be conducted for eight quarters. The MNA samples will be collected for VOC and MNA parameter analysis. An MNA report will be prepared to document the effectiveness of MNA in each groundwater zone. If MNA performance is adequate, performance monitoring will continue semi-annually for the next 3 years, then annually until the next 5-year review. The sampling frequency may then be changed to once every 5 years if the data suggest less frequent sampling is appropriate. For costing purposes, a 30-year monitoring program is assumed. Sampling frequency, reporting frequency, or analytical suite may be modified based on the results of the sampling program. Additional monitoring is recommended once every five years after reduction of the COCs and demonstration of MNA effectiveness to support 5-year reviews until cleanup levels are met.

The MNA evaluation in **Appendix C** has also shown that MNA in the intermediate zone will not be effective in reducing the high MC concentrations in the vicinity of 29WW16. However, in this alternative, MNA will be implemented following chemical oxidation, which will have reduced the MC concentrations to levels that are amenable to remediation by MNA. However, the introduction of the chemical oxidant may result in conditions in the intermediate groundwater zone that are not optimal for biological degradation, which is a significant mechanism of natural attenuation. Therefore, it may be necessary to inject a carbon source and specialized microorganisms into the intermediate zone to enhance biological degradation of the remaining chlorinated organics. Aquifer conditions will be evaluated following the injection to determine if

this is necessary. If required, the carbon source and microorganisms would be injected via the four wells installed for the oxidant injection.

An evaluation of the site-wide extent of arsenic, mercury and nickel will be made during remedial design. During subsequent monitoring events, it is expected that groundwater will be tested for metals, including arsenic, mercury and nickel, to monitor cleanup levels, and potential mobilization of metals due to changed subsurface conditions during remediation.

5.2.2.5 Land Use Controls

Land use controls will be maintained until the proposed cleanup levels are achieved in both the shallow and intermediate zones. The LUCs will consist of a restriction on groundwater use at LHAAP-29. If at some time in the future property ownership is transferred from a federal agency to the private sector, a deed restriction for the use of groundwater will be developed. The U.S. Army will record a notice of LUCs with Harrison County and will include the notice with any transfer letter to the USFWS for the intended future use as a national wildlife refuge.

5.2.3 Alternative 3 – Excavation and Off-site Disposal for Soil; Plug Lines; and Extraction, MNA, and LUCs for Groundwater

The goals of this alternative are to prevent exposure of the hypothetical future maintenance worker to contaminated soil and groundwater and ecological receptors to surface soil/sediment at LHAAP-29. Soil and sediment that have the potential to impact groundwater will be removed. To eliminate future impact to on-site surface water and groundwater, the TNT transite wastewater lines and the cooling water lines will be plugged and abandoned in place. The shallow zone groundwater have contaminants above MCLs or GW-Ind that will be reduced over time via MNA to meet the cleanup levels. This alternative uses groundwater extraction followed by MNA to return the groundwater in the intermediate zone to the cleanup levels. The extracted groundwater would be piped to a series of on-site storage tanks, and then pumped to trucks and transported to the existing LHAAP groundwater treatment plant for treatment and discharge.

5.2.3.1 Removal of Soil above Cleanup Levels

As in Alternative 2, the recommended removal action consists of excavation of the nitrotoluene and perchlorate-contaminated soil and off-site disposal at a RCRA Subtitle D-permitted landfill. Excavation of the contaminated soil and disposal in a RCRA-permitted landfill will result in the following: 1) removal of contaminated soil that is a potential source of cross-contamination to groundwater, thereby ensuring that groundwater can ultimately be returned to its beneficial uses; 2) ecological receptors, thereby protecting the deer mouse and shrew; and 3) removal of soil that is a direct risk to the hypothetical future maintenance worker, thereby protecting human health by preventing inhalation, ingestion, and dermal contact with the COCs. The estimated volume of soil to be removed is approximately 3,900 cubic yards and is based on the cleanup levels in **Table 3-4** and the receptor. The excavation locations are highlighted on **Figure 2-1**. The

removal of soil contamination will be verified by collecting confirmation samples from the walls and floors of the excavation area and submitting them for laboratory analysis for the COCs of interest. Clean borrow soil will be used as needed to backfill the excavations so they can be graded for proper drainage.

With the removal of the contaminated surface soil and sediment at LHAAP-29, plugging of the former TNT wastewater and cooling water lines and abandoning the manholes associated with the cooling water lines, health and ecological risks as well as the potential migration of soil to surface water and groundwater will be eliminated and long-term operations for soil will not be required.

5.2.3.2 Plug and Abandon

The transite TNT wastewater line will be flushed with water to remove visual residue. The rinsate water will be containerized. Appropriate rinsate handling procedures will be followed based on its waste classification. The inlets and outlets of the traniste TNT wastewater line will be plugged with a bentonite slurry mix or equivalent.

The cooling water lines showed no significant contamination except for 2,4-DNT in the solid residue in manholes 8 and 10. The cooling water lines will be inspected to determine if there is contaminated solid residue in the lines adjacent to manholes 8 and 10. An attempt will be made to sample and analyze the residue and water in the cooling water lines as part of the RD phase. If there is not enough residue volume to sample or the concentrations in the sample are less than the GW-Ind (water) or GWP-Ind (solid) and the residue is nonhazardous, the pipe will be plugged and abandoned. No solid residue or liquid will be left in the pipe if the explosive constituents exceed the GWP-Ind (residue), the GW-Ind (water) or the solid or liquid is determined to be hazardous (residue or water). If explosive concentrations are above the GWP-Ind (residue) or GW-Ind (water) or the material is found to be hazardous, the line will be flushed before plugging and abandoning. The rinsate will be characterized for waste handling. The manholes will then be plugged with a bentonite slurry mix or equivalent.

5.2.3.3 Groundwater Extraction and Treatment for Intermediate Groundwater Zone

The groundwater remediation component of this alternative involves the extraction of VOC-contaminated groundwater by means of recovery wells, temporary storage in on-site ASTs, pumping of the stored water into trucks to be transported for treatment at the existing LHAAP water treatment plant. The purpose of this “pump and treat” system is to reduce VOC concentrations in the intermediate zone groundwater to levels that can subsequently be reduced through natural attenuation (typically levels in the 1,000s of µg/L). The anticipated duration of extraction is 3 years.

This action will begin with a pre-design study. A pump test will be conducted and hydrogeologic parameters will be measured to better design the system. Groundwater flow will be modeled to set performance evaluation parameters and to assess the likely time required for remediation.

Groundwater contamination in the intermediate zone at LHAAP-29 primarily consists of a MC plume. A minimum of five additional wells (four extraction and one monitoring) are proposed to be installed in the intermediate zone within the region of greatest MC contamination in order to provide a more effective extraction process. Several groundwater monitoring wells are located throughout the site and some of these could also be converted to extract contaminated groundwater if needed.

A piping system will be constructed to transport the extracted water from five extraction wells (four new wells and 29WW16) to three 5,000-gallon storage tanks to be located on-site at LHAAP-29. The tanks will be interconnected and will be equipped with a high level shut off to the pump. Once every two days, the water will be pumped out to a tank truck and transported to the existing groundwater treatment plant for treatment and discharge. A 20-foot by 50-foot gravel pad will be prepared for the tanks plus a 6-inch layer of gravel will be placed to upgrade the road to the tanks. This will require approximately 19,000 tons of base stone at LHAAP-29. The alternative will also require the installation of approximately 2,350 feet of 2-inch high-density polyethylene piping for pumping the water to the tanks. The piping will be installed at approximately three feet bgs to prevent disturbance. These estimates are for costing purposes only and will be revised during the design.

During extraction, samples will be collected from the five extraction wells plus the new monitoring well to monitor the effectiveness of the action. During startup of the extraction system (until the system is operating properly), bimonthly sampling will be conducted. Startup is estimated to be approximately six months. After startup, monitoring will be reduced to quarterly for the remaining 2.5 years.

Water Treatment. The extracted groundwater from LHAAP-29 will be treated at the LHAAP groundwater treatment plant, which was originally built to treat groundwater containing VOCs and metals extracted from other LHAAP sites. The plant uses air stripping, carbon adsorption, and thermal oxidation. Perchlorate treatment using a fluidized bed reactor was added in April 2001 to the treatment plant. **Figure 5-1** shows a simplified flow diagram of the primary treatment components in the existing plant. The extracted water from LHAAP-29 would be discharged from the tank truck into the existing 300,000-gallon equalization tank. This tank receives water from other LHAAP sites and is stored in this tank until treatment. After the water is treated, the effluent would be discharged in accordance with plant procedures. The plant presently operates at a fraction of its maximum capacity of 1 to 1.5 million gallons of water per

month. The original groundwater treatment plant components have adequate capacity to accommodate the increase in volume that will be introduced to the system when the contaminated groundwater is transported from LHAAP-29 to the plant.

Extraction System. Operation and maintenance will include groundwater extraction system maintenance, groundwater treatment plant operations, and environmental media monitoring. In three years, the extraction wells are anticipated to remove the highest concentrations of VOCs from the groundwater intermediate zone at LHAAP-29, thus reducing the contaminant mass to make conditions favorable for MNA (estimate assumes 3 years). For MNA, four wells will be selected for use as monitoring wells, and monitoring will be implemented to demonstrate that any remaining VOCs are attenuated by natural processes (see **Section 5.2.3.4**). During the groundwater extraction operations, the extraction wells will require regular maintenance to prevent fouling of well screens, and the extraction pumps will require routine maintenance and may also require replacement. Cleaning of the pipelines, refurbishing pumps and other maintenance activities will be needed on the groundwater collection and transport system during full-scale operation. O&M costs will include the addition of chemicals, power, and labor; equipment cleaning, tank cleaning, general system maintenance, and replacement; and regulatory monitoring and reporting. O&M activities will also be conducted at the LHAAP plant location as part of the routine plant O&M activities.

5.2.3.4 Monitored Natural Attenuation

In both the shallow and intermediate groundwater zones, MNA will be utilized to complete the remediation. MNA will reduce contaminant levels to MCL or GW-Ind concentrations and return these zones to beneficial uses.

The MNA evaluation in **Appendix C** has shown that MNA can be effective in the shallow zone. Based on the findings of that evaluation, the time necessary to return the shallow aquifer is driven by 1,2-DCA, which may require approximately 70 years.

The MNA evaluation in **Appendix C** has also shown that MNA in the intermediate zone will not be effective in handling the high MC concentrations in the vicinity of 29WW16. However, in this alternative, MNA will be implemented following three years of groundwater extraction, which will have reduced the MC concentrations to levels that are amenable to remediation by MNA.

A monitoring program will be developed as part of the remedial design phase and will define the MNA expectations. The objectives of the monitoring program will include the demonstration that MNA is occurring, verification that there has been no unacceptable impact to downgradient receptors, verification that the plume is not expanding, and verification of the attainment of

RAOs. The sampling program design will be based on the current plume, seasonal variations, groundwater direction, and velocity.

MNA quarterly monitoring will be conducted for eight quarters. For the estimate, 12 existing wells and 1 new well will be selected for MNA in the shallow groundwater zone. Four wells will be selected in the intermediate groundwater zone. The MNA samples will be collected for VOC and MNA parameter analysis. An MNA report will be prepared to document the effectiveness of MNA in each groundwater zone. If MNA performance is adequate, performance monitoring will continue semi-annually for the next 3 years, then annually until the next 5-year review. The sampling frequency may then be changed to once every 5 years if the data suggest less frequent sampling is appropriate. For costing purposes, a 30-year monitoring program is assumed. Sampling frequency, reporting frequency, or analytical suite may be modified based on the results of the sampling program. CERCLA 5-year reviews will be performed at LHAAP-29 as required until ARARs are achieved.

An evaluation of the site-wide extent of arsenic, mercury and nickel will be made during remedial design. During subsequent monitoring events, it is expected that groundwater will be tested for metals, including arsenic, mercury and nickel, to monitor cleanup levels, and potential mobilization of metals due to changed subsurface conditions during remediation.

5.2.3.5 Land Use Controls

Land use controls will be maintained until the proposed cleanup levels are achieved in both the shallow and intermediate zones. The LUCs will consist of a restriction on groundwater use at LHAAP-29. If at some time in the future property ownership is transferred from a federal agency to the private sector, a deed restriction for the use of groundwater will be developed. The U.S. Army will record a notice of LUCs with Harrison County and will include the notice with any transfer letter to the USFWS for the intended future use as a national refuge.

Table 5-1
Alternative Development

Contaminated Media	Process Option	Selected for Alternative Grouping		
		1 (No Action)	2	3
SOLIDS	Soil / Sediment	—	Yes	Yes
	Residue in TNT Waste Water and Cooling Water Pipe Lines	—	Yes	Yes
GROUNDWATER	Shallow Zone	—	Yes	Yes
	Intermediate Zone	—	Yes	—
	Ex-situ treatment, MNA, LUCs until goals achieved	—	—	Yes

Abbreviations:

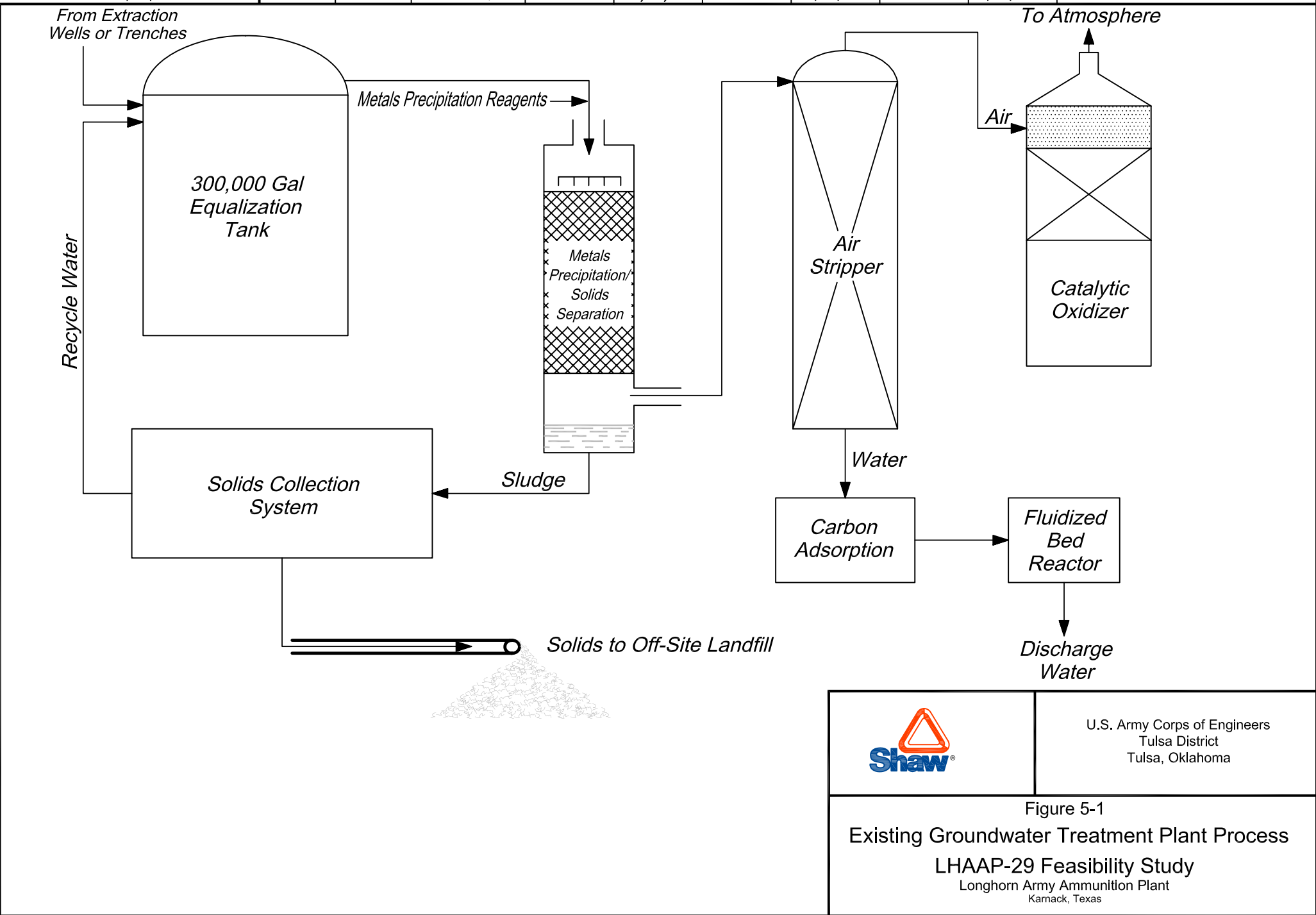
TNT trinitrotoluene


LUCs land use controls

PLOT DATE: 1/30/06
 FORMAT REVISION 5/13/02

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY
---	---	STOUGHTON, MA	D. CRISPO	S. WATSON	P. SRIVASTAV

00091247
 DRAWING NUMBER 117591-A45



	U.S. Army Corps of Engineers Tulsa District Tulsa, Oklahoma
<p>Figure 5-1 Existing Groundwater Treatment Plant Process LHAAP-29 Feasibility Study Longhorn Army Ammunition Plant Karnack, Texas</p>	

6.0 Detailed Analysis of Alternatives

6.1 Introduction

This section presents and assesses relevant information that provides the basis for selecting an alternative. **Section 6.2** provides an overview of the evaluation criteria. The detailed analysis begins with an individual analysis in **Section 6.3** in which each alternative is individually evaluated according to the evaluation criteria identified in the NCP (40 CFR 300.430). Following the individual analyses, the alternatives are compared in relation to the two threshold criteria and then the alternatives are assessed regarding the five balancing criteria, highlighting the key advantages, disadvantages, and trade-offs that are considered as part of the evaluation process.

6.2 Overview of the Evaluation Criteria

CERCLA, Section 121, as amended, specifies statutory requirements for remedial actions. These requirements include protection of human health and the environment, compliance with ARARs, a preference for permanent solutions that incorporate treatment as a principal element to the maximum extent practicable, and cost-effectiveness. To assess whether alternatives meet the requirements, the USEPA has identified nine criteria in the NCP (40 CFR 300.430) that must be evaluated for each alternative considered for selection (Section 300.430[e][9][iii]). Provided here are summaries of the nine criteria and an overview of the approach taken by this FS to evaluate each alternative with regard to these criteria.

6.2.1 Criterion 1: Overall Protection of Human Health and the Environment

This evaluation criterion assesses whether the alternative achieves and maintains adequate protection of human health and the environment in accordance with the RAOs established in **Section 3.0**. Because the scope of this criterion is broad, it also reflects the discussions of the subsequent criteria, including long-term effectiveness and permanence, and short-term effectiveness. Evaluation of this criterion describes how site risks associated with each pathway are eliminated, reduced, or mitigated through treatment, engineering, or LUCs. This criterion also considers whether an alternative poses an unacceptable short-term or cross-media affect.

6.2.2 Criterion 2: Compliance with ARARs

This criterion addresses compliance with promulgated federal and state environmental requirements. The detailed analysis summarizes which requirements are applicable or relevant and appropriate to an alternative and how the alternative meets these requirements. If an alternative cannot meet a requirement, a determination can be made that a waiver under CERCLA may be appropriate, and a basis for justifying the waiver is presented. ARARs consist

of two sets of requirements – those that apply and those that are relevant and appropriate. In certain cases, standards may not exist that address the proposed action or the COCs. In such cases, nonpromulgated advisories, criteria, or guidance developed by the USEPA or other federal agencies or states can be TBCs. There are three types of ARARs; chemical-specific, location-specific, and action-specific. The chemical-, location- and action-specific ARARs are presented in **Section 3.2**.

6.2.3 Criterion 3: Long-Term Effectiveness and Permanence

This criterion evaluates the extent to which an alternative achieves an overall reduction in risk to human health and the environment after the RAOs are met. The criterion considers the degree to which the alternative provides sufficient long-term controls and reliability to prevent exposures that exceed protective levels for human and environmental receptors. The principal factors addressed by this criterion include magnitude of residual risk and the adequacy and reliability of controls to address such risk. This criterion also addresses the uncertainties associated with these factors.

The evaluation of adequacy and reliability of controls assesses the effectiveness of any treatment, containment, or institutional measures that are part of the alternative. Factors considered include performance characteristics, maintenance requirements, and expected durability. Information and data from past performance and similar technology applications are incorporated appropriately into the evaluation. LUCs are considered where they have the potential to improve the effectiveness of engineered measures.

6.2.4 Criterion 4: Reduction of Toxicity, Mobility, or Volume through Treatment

This criterion reflects the statutory preference that remedial alternatives contain a principal component that substantially reduces toxicity, mobility, or volume of hazardous substances through treatment. The evaluation regarding this criterion considers the extent to which alternative technologies can effectively and permanently fix, transform, immobilize, or reduce the volume of waste materials and contaminated media.

6.2.5 Criterion 5: Short-Term Effectiveness

This criterion addresses the effects of the construction and implementation phases of the alternative until the RAOs are achieved. The evaluation regarding this criterion considers the effect on human health and the environment posed by operations conducted during the remedial action phases. Both the potential effect and associated mitigative measures are examined for maintaining protectiveness for the community, remediation workers, and environmental receptors throughout the duration of remedial activities.

Potential short-term risks to the public include inhalation of constituents that may be released during waste removal and treatment operations, and contaminant exposure and physical injury

during waste transport off site. Potential short-term risks to workers include direct contact and exposure during construction, waste handling, and transportation; physical injury or death during construction and transportation activities; and nonremediation worker exposures to airborne contaminants during waste and soil removal operations. Alternative analyses also include a description of mitigating measures such as engineering and LUCs that are expected to minimize potential risks to the public and workers. This evaluation also addresses the anticipated duration of remedial activities.

6.2.6 Criterion 6: Implementability

This criterion examines the technical and administrative factors affecting implementation of an alternative and considers the availability of services and materials required during implementation. Technical factors to be assessed include the ease and reliability of construction and operations, the prospects for implementing a future action, and the adequacy of monitoring systems to detect failures. Administrative factors include permitting and coordination requirements between the lead agency and regulatory agencies. Service and material considerations include TSD capacities, equipment and operator availability, and prospective technology applicability or development requirements.

The assessment of technical feasibility examines the performance history of the technologies in direct applications or considers the expected performance for similar applications. Uncertainties associated with construction, operation, and performance monitoring are also addressed.

The evaluation of administrative feasibility includes a discussion of those actions required to coordinate with regulatory agencies to establish the framework for complying with key substantive technical requirements that must be met by an alternative. Additionally, those alternatives that include off-site transportation of waste are reviewed to assess the feasibility of off-site disposal.

The availability of services and materials is addressed by analyzing the material components of the proposed technologies to determine the locations and quantities of those materials, and by reviewing process operations to identify special services, operator skills, or training required to readily implement the process.

The NCP requires that the evaluation of the relative administrative feasibility of each alternative include "...activities needed to coordinate with other offices and agencies, and the ability and time required to obtain any necessary approvals and permits from other agencies (for off-site actions). CERCLA, Section 121(e), stipulates that no deferral, state, or local permit shall be required for the portion of any removal or remedial action conducted entirely on site." An action must satisfy the substantive requirements of the permits that will otherwise be required.

6.2.7 *Criterion 7: Cost*

Cost estimates are included for each remedial alternative. The estimates are based on feasibility level scoping and are intended to aid in making project evaluations and comparisons among alternatives. The estimates have an expected accuracy of +50 to –30 percent for the scope of the action described in **Section 5.0** for each alternative. The estimates are divided into capital cost and O&M cost and are developed according to an assumed schedule for the various activities based on similar project experience.

Capital costs are defined as those expenditures required to initiate and install an alternative. These are short-term costs and are exclusive of costs required to maintain the action throughout the project lifetime. Capital costs consist of direct and indirect costs. Direct costs include construction costs (material, labor, and equipment to install an action), service equipment, process and new process buildings, utilities, and waste disposal costs. Indirect costs include design engineering, inspection, project integration, project administration and management, and project contingencies.

O&M costs are long-term costs associated with ongoing remediation at a site. These costs occur after construction and installation are completed. The costs include labor, materials, utilities, and services required to monitor, operate, and maintain the facilities for a period of up to 30 years.

The estimated present worth of each remedial alternative is determined on a discount rate of 2.8 percent and a base O&M and monitoring period of up to 30 years, unless the alternative evaluated is expected to be complete in less than 30 years.

Appendix E presents detailed cost estimates and the major assumptions used to develop the cost estimates for each remedial alternative.

6.2.8 *Criterion 8: State Acceptance*

State acceptance of an alternative will be evaluated in the PP issued for public comment. Therefore, this criterion is not considered in this FS.

6.2.9 *Criterion 9: Community Acceptance*

Community acceptance of each alternative will be evaluated after a PP is issued for public comment. Therefore, this criterion is not considered in this FS.

6.3 *Individual Analysis of Alternatives*

6.3.1 *Alternative 1 - No Action Alternative*

Under the “no action” alternative, no further action will be taken at LHAAP-29 to control human exposure to contaminated groundwater or to monitor potential groundwater impacts to surface water. The contaminated waste and cooling water lines, soil, sediment and groundwater will

remain in place without the implementation of any contaminant removal, treatment, or containment. The LUCs to prevent groundwater access at the site will not be established or will be discontinued. No environmental monitoring will occur. It is assumed that the public and ecological receptors could access the waste. This alternative provides a baseline for comparison purposes.

6.3.1.1 Overall Protection of Human Health and the Environment

The “no action” alternative does not achieve the RAOs for LHAAP-29. This alternative provides no control of exposure to the contaminated waste and cooling water lines, soil, sediment, and groundwater and no reduction in the risks to human and ecological receptors for current and future land use scenarios. Risks to receptors will exceed the USEPA-established threshold for acceptable incremental lifetime cancer risk of 1×10^{-4} for carcinogens or an HI of 1 for noncarcinogens. The greatest risk will come from ingestion of groundwater although risk from exposure to surface soil is possible. The contaminants causing the greatest amount of risk are VOCs in the intermediate groundwater zone and perchlorate and explosive compounds in the shallow groundwater zone. The EEQ is greater than 1 for the deer mouse and short-tailed shrew. Explosive compounds in the soil are located at isolated areas of the site and pose a human health and ecological hazard. Additionally, the residual material in the TNT waste and cooling water lines have the potential to migrate to surface water and groundwater since the lines remain open to the environment.

6.3.1.2 Compliance with ARARs

CERCLA, Section 121, cleanup standards, including compliance with ARARs, apply only to actions the USEPA determines should be taken under CERCLA, Sections 104 and 106 authority. A “no action” decision will be made when no action is deemed necessary to reduce, control, or mitigate exposure because the site does not present a threat to human health and the environment, or because any action taken will worsen the negative effects on human health and the environment. Because no remedial activities are associated with this alternative, compliance with chemical-specific ARARs will not be met. Since no remedial activities will be conducted, action-specific and location-specific ARARs will not apply.

6.3.1.3 Long-Term Effectiveness and Permanence

6.3.1.3.1 Magnitude of Residual Risk

The “no action” alternative will not provide an effective or permanent long-term solution. Soil exposure routes generated an HI of 1.3 for the hypothetical future maintenance worker and an unacceptable EEQ for ecological receptors. The residual risk and toxicity from groundwater exposure under a “no action” alternative will be unacceptable at LHAAP-29. For the hypothetical future maintenance worker, groundwater exposure routes account for over 99 percent of the overall carcinogenic and non-carcinogenic risks, generating a carcinogenic risk of

3.9×10^{-1} and an HI of 3,000. These risks were conservatively calculated for a hypothetical future maintenance worker ingesting the groundwater. Currently, the groundwater at LHAAP-29 is not used for drinking water, and is not anticipated to be used for drinking water under a national wildlife refuge future use scenario.

6.3.1.3.2 Adequacy and Reliability of Controls

The “no action” alternative will not establish or maintain any LUCs at LHAAP-29 and, therefore, will not reduce the existing site risks.

6.3.1.4 Reduction of Toxicity, Mobility, or Volume through Treatment

Implementation of the “no action” alternative will not reduce toxicity, mobility, or volume of contaminants because this alternative does not employ treatment.

6.3.1.5 Short-Term Effectiveness

Under the “no action” alternative, no remedial action will be taken; therefore, the short-term effectiveness criterion is not applicable to this alternative. The “no action” alternative will not cause any added short-term risks to remediation workers, the community or the environment.

6.3.1.6 Implementability

This alternative is inherently implementable because no remedial action will be taken.

6.3.1.7 Cost

There are no costs associated with the “no action” alternative.

6.3.2 Alternative 2 – Excavation and Off-site Disposal for Soil; Plug Lines; In Situ Chemical Oxidation for Intermediate Zone Groundwater; MNA and LUCs

This alternative consists of the following major components:

- Soil and sediment excavation
- Plugging and abandonment of the former TNT transite wastewater and cooling water lines and cooling water line manholes
- In situ chemical oxidation to address the area of greatest contamination in the intermediate zone groundwater plume
- MNA for the remaining contamination in the intermediate groundwater zone
- MNA for COCs in the shallow groundwater zone
- Long-term LUCs to restrict use of groundwater until proposed cleanup levels are met

6.3.2.1 Overall Protection of Human Health and the Environment

6.3.2.1.1 Protection of Human Health

The actions proposed for this alternative will:

1. Prevent exposure to residual wastes in the pipe lines, manholes, soil, and sediment that exceed cleanup levels
2. Prevent potential transport of contaminated soil, contaminated sediment, and residual wastes in the pipe lines
3. Prevent leaching of contaminants from the soil or the pipe lines into the groundwater at concentrations that exceed cleanup levels
4. Directly treat high concentrations of VOCs in the intermediate groundwater zone
5. Ultimately return both the intermediate and shallow groundwater zones to cleanup levels
6. Prevent inappropriate groundwater usage via LUCs

Therefore, the residual site risk upon completion of these actions will be within the target risk range for the hypothetical future maintenance worker. This alternative is protective of human health and the environment and achieves the RAOs for LHAAP-29.

The field activities planned under this alternative will have some short-term risks requiring the significant reliance on engineering controls to minimize the risk. Exposure to risks that occur during excavation of contaminated soil and sediment and plugging of underground lines will be controlled through the implementation of a health and safety plan in compliance with 29 CFR 1910.120. The plan will establish safe work procedures and appropriate PPE.

6.3.2.1.2 Protection of the Environment

The removal of soil and sediment that exceeds cleanup levels at LHAAP-29 will reduce the risk to ecological receptors from contaminated soil. In the short-term, risks will occur when soils and sediment are removed and staged. Engineering controls will be important to control direct exposure and runoff potential during the field work.

6.3.2.2 Compliance with ARARs

6.3.2.2.1 Chemical-Specific ARARs

This alternative will comply with the chemical-specific ARARs for surface soils and sediment at LHAAP-29. Soil and sediment excavation will remove material that causes exceedances of the target cancer risk range and the non-cancer HI for the hypothetical future maintenance worker in these media. The removal of the source soils and sediment and plugging of the former TNT wastewater and cooling water lines will positively impact groundwater by eliminating the

potential for the leaching of contaminants into groundwater at concentrations exceeding cleanup levels. The remediation of the elevated MC concentrations in the intermediate groundwater zone will target the bulk of the contaminant mass, provide an efficient remedy to arrest potential vertical and horizontal plume migration, and reduce risks of exposure to groundwater that exceeds chemical-specific ARARs.

6.3.2.2.2 Location-Specific ARARs

The activities that will be conducted under this alternative would comply with all location-specific ARARs. No activities would take place in sensitive environments such as wetlands, and no impacts to archeological resources or threatened and endangered species are anticipated.

6.3.2.2.3 Action-Specific ARARs

The activities that will be conducted under this alternative will comply with all action-specific ARARs. Soil remediation will occur in compliance with all transportation and disposal requirements. Runoff controls will be important during soil/sediment excavation. All runoff requirements will be met to protect Goose Prairie Creek and Central Creek.

6.3.2.3 Long-Term Effectiveness and Permanence

6.3.2.3.1 Magnitude of Residual Risks

Upon completion of source removal, the residual site risk will be within the target risk range and below an HI of 1 for the hypothetical future maintenance worker and within risk range for the ecological receptor. The implementation of LUCs under this alternative would prevent direct contact by human receptors with contaminated groundwater at LHAAP-29, thus minimizing the potential risk posed by groundwater contamination.

6.3.2.3.2 Adequacy and Reliability of Controls

The soil exposure risk at LHAAP-29 for a hypothetical future maintenance worker or ecological receptor would be removed by excavating the isolated contaminated soil and sediment areas and plugging the former TNT wastewater and cooling water lines and manholes.

Treatment of high concentrations of VOCs in the intermediate groundwater zone through in situ treatment will be effective for reducing COC concentrations to levels that can be addressed via natural attenuation. In situ treatment includes concurrent groundwater extraction. The extracted water will be treated at the existing LHAAP groundwater treatment plant. That plant has been operating successfully for several years. There are significant issues associated with the effectiveness of groundwater extraction. If hydraulic conductivity in the aquifer is too low, the volumetric flow rate of groundwater to the well will be low and will decrease the effectiveness of extraction. A small capture zone may require excessive time to capture the contamination. There are more pump maintenance issues associated with low flow conditions. If the extraction well goes dry, it causes the pump to overheat and fail to operate.

The layer of clay to silty clay between the shallow and intermediate groundwater zones will provide a barrier that will keep the passive reductive process within the shallow zone from being affected by the chemical oxidation process proposed for the intermediate zone. In addition, the properties of persulfate, the proposed chemical oxidant, allow for optimum delivery and distribution to the subsurface matrix without being limited by solubility as is the case with other oxidants.

MNA will be implemented for groundwater in both the shallow zone and the intermediate zone. In the intermediate zone, it will be initiated after the in situ treatment phase. The MNA evaluation (**Appendix C**) has demonstrated that natural attenuation can be effective in the shallow zone. Effectiveness of natural attenuation in the intermediate zone will depend on successful completion of the in situ treatment. In both zones, long-term success will be verified by monitoring the progress of natural attenuation.

Long-term LUCs for groundwater will prevent exposure to the remaining COCs in both the shallow and intermediate groundwater zones until proposed cleanup levels are met. The reliability of LUCs would depend on the maintenance of the controls. It is not anticipated that groundwater cleanup levels in the shallow zone will be met in the near future.

Consistent with the required 5-year CERCLA review, compliance with the risk-reduction goals will be monitored and performance of the controls will be assessed. The 5-year reviews may indicate the need for components of this alternative to be repaired, modified, or replaced.

6.3.2.4 Reduction of Toxicity, Mobility, or Volume through Treatment

In two ways, this alternative satisfies the USEPA statutory preference for remedial actions that permanently reduce contaminant toxicity, mobility and volume and utilize treatment as a principle element. In the intermediate groundwater zone of LHAAP-29, in situ chemical oxidation will reduce the toxicity and volume of the major contaminants. In both the shallow and intermediate groundwater zones, MNA will reduce the toxicity and volume through natural biological and chemical processes.

6.3.2.5 Short-Term Effectiveness

6.3.2.5.1 Protection of the Community during Remedial Action

This alternative is protective of the surrounding community during remedy implementation primarily because all activities would occur on site with very little disturbance of contaminated material. Truck traffic for equipment and materials, including the shipment of contaminated soil off site for disposal and on-site delivery of borrow material (for backfilling), and chemical oxidant (for in situ treatment) will occur. If a spill of contaminated soils occurs, the spill would be easy to contain and would not impact the surrounding communities. During remediation

activities at LHAAP-29, control of surface runoff will be important to avoid releases of contamination to adjacent surface water bodies.

6.3.2.5.2 Protection of Workers during Remedial Action

Some short-term risks to human health or the environment will exist during implementation of this alternative. The soil excavation activity has the potential for transportation or construction accidents. Additionally, this alternative will involve potential short-term risks to workers associated with the operation of drilling equipment and potential exposure to decontamination fluids, chemical oxidant, contaminated groundwater, and excavated soil. Other risks to workers include those generally associated with construction activities (e.g., slips, trips, and falls).

The implementation of proper engineering controls and safety equipment will minimize potential short-term risks to remediation personnel conducting the installation of the groundwater extraction system and groundwater sampling activities. Measures will be taken to prevent the contact of personnel with the extracted groundwater. Remediation workers will conform to the site health and safety program and will be equipped with the necessary PPE. A site-specific health and safety plan will be prepared prior to implementing this alternative.

6.3.2.5.3 Short-Term Environmental Effects

Minor clearing and grubbing at LHAAP-29 will be required to effectively excavate the soil and sediment and install monitoring wells or injection points for in situ chemical oxidation of groundwater. However, since these areas have been cleared in the past, it is unlikely that there are any sensitive species that will be impacted. If any sensitive areas are found, the appropriate regulation will be followed. The implementation of proper engineering controls will minimize the risk of environmental impacts.

6.3.2.5.4 Duration of Remedial Activities

In six months, in situ treatment is expected to remove the highest concentrations of VOCs in the intermediate zone, thus reducing the contaminant mass to concentrations that can be readily addressed by natural attenuation. At that point, the injection wells will begin to be used as monitoring wells, and monitoring will be implemented to demonstrate that any remaining VOCs are attenuated by natural processes. Perchlorate, VOCs, and explosive compounds detected in the shallow zone are expected to continue to attenuate by natural processes. After the initial eight quarters of MNA performance monitoring in each zone, natural attenuation monitoring will be semiannually for three years, then annually until the next CERCLA 5-year review.

Long-term monitoring, consisting of LUCs surveillance and groundwater monitoring will be implemented every five years thereafter. Until cleanup levels are met, monitoring will be needed to determine trends in groundwater contamination levels and effectiveness of the remedial action. The monitoring time may increase or decrease depending on the effectiveness of the

treatment method. The amount of time needed to achieve cleanup levels in groundwater will depend on the effectiveness of the natural attenuation. The natural attenuation evaluation (**Appendix C**) estimates that it will take approximately 70 years (due to 1,2-DCA) for complete attenuation to cleanup levels for the shallow zone.

6.3.2.6 Implementability

6.3.2.6.1 Technical Feasibility

The limited amount of soil and sediment excavation is easy to implement once the area requiring excavation is defined and cleared. Plugging and abandonment of the TNT transite wastewater and cooling water lines and the cooling water line manholes can be conducted without extensive intrusive activities. Considering the small quantity of soil with reasonably low levels of contamination requiring disposal, a disposal location will be available. All equipment, services and materials are readily available to conduct the activities for this alternative, and the LHAAP groundwater treatment plant is already operational.

Minimal technical concerns exist that will hinder the implementation of the in situ chemical oxidation. The equipment and materials required for oxidant source delivery are commercially available, but specialized knowledge of in situ chemical oxidation treatment will be required for implementation. This methodology may be difficult to implement in situ because of concerns regarding delivery and sufficient exposure of the contaminants to the chemical agents. An additional typical concern is the release of excess reactants or byproducts to the environment. Low groundwater yield could decrease the effectiveness of the associated extraction.

6.3.2.6.2 Administrative Feasibility

All actions under this alternative would be implemented on the site and thus do not require permits, though substantive provisions of permits that would otherwise be required are considered to be ARARs. By legal agreement (i.e., the FFA), the U.S. Army shall submit to the USEPA and TCEQ a Responsiveness Summary and ROD. Following consideration of any comments by TCEQ, the ROD will be finalized jointly by the U.S. Army and USEPA, or if they are unable to reach agreement about the selection of the remedial action, by the USEPA administrator. By addressing the identified ARARs in the ROD and subsequent documents, it is anticipated that the alternative would adequately address all administrative barriers.

LUCs, although administratively implementable, would require the development of an implementation plan as part of the remedial design, and internal notices to relevant regulatory offices of the existence of the LUCs. Approval by the USEPA and the State of Texas is required prior to the modification or termination of LUCs, implementation actions, or modification of land-use by the U.S. Army. The U.S. Army must also seek concurrence from the USEPA and the State of Texas prior to any action that may disrupt the effectiveness of the LUCs or any action that may alter or negate the need for LUCs.

6.3.2.7 Cost

The total project present worth cost of Alternative 2 is approximately \$3.0 million. The details and a comparison of the cost estimates for all of the alternatives are presented in **Appendix E**.

6.3.2.7.1 Capital Cost

The total capital cost is estimated at approximately \$2.1 million. The direct capital cost includes mobilization of construction activities; excavation of soil material; plugging of underground lines; filling of manholes associated with the cooling water lines; installation and operation of the in situ chemical oxidation system (including the associated groundwater extraction); transportation and disposal of excavated soils; demobilization of construction activities and the activities associated with LUCs. Capital costs also include a work plan, regulatory and remedial design documents and a closure report.

6.3.2.7.2 O&M Cost

The total O&M cost is estimated at approximately \$919,000. This cost includes monitoring for MNA in the shallow and intermediate zones, monitoring to support required CERCLA 5-year reviews, and LUC surveillance to verify groundwater is not used.

6.3.3 Alternative 3 – Excavation and Off-site Disposal for Soil; Plug Lines; Groundwater Extraction for Intermediate Zone; MNA and LUCs

This alternative consists of the following major components:

- Soil and sediment excavation;
- Plugging and abandonment of the former TNT transite wastewater and cooling water lines and the cooling water line manholes;
- Extraction, treatment, and disposal of highly contaminated groundwater from in the intermediate zone
- MNA for the remaining contamination in the intermediate groundwater zone
- MNA for COCs in the shallow groundwater zone
- Long-term LUCs to restrict use of the groundwater until the proposed cleanup levels are met

6.3.3.1 Overall Protection of Human Health and the Environment

6.3.3.1.1 Protection of Human Health

The actions proposed for this alternative will:

1. Prevent exposure to residual wastes in the pipe lines, manholes, soil, and sediment that exceed cleanup levels

2. Prevent potential transport of contaminated soil, contaminated sediment, and residual wastes in the pipe lines
3. Prevent leaching of contaminants from the soil or the pipe lines into the groundwater at concentrations that exceed cleanup levels
4. Extract, treat, and dispose highly contaminated groundwater from the intermediate groundwater zone
5. Ultimately return both the intermediate and shallow groundwater zones to cleanup levels
6. Prevent inappropriate groundwater usage via LUCs

Therefore, the residual site risk upon completion of these actions would be within the target risk range for the hypothetical future maintenance worker. This alternative is protective of human health and the environment and achieves the RAOs for LHAAP-29.

The field activities planned under this alternative will have some short-term risks requiring significant reliance on engineering controls to minimize the risk. Exposure to risks that occur during excavation of contaminated soil and sediment and plugging of the underground lines will be controlled through the implementation of a health and safety plan in compliance with 29 CFR 1910.120. The plan will establish safe work procedures and appropriate PPE.

6.3.3.1.2 Protection of the Environment

The removal of soil and sediment that exceed cleanup levels at LHAAP-29 will reduce the risk to ecological receptors from contaminated soil. In the short-term, risks will occur when the soil and sediment are removed and staged. Engineering controls will be important to control direct exposure and runoff potential during the field work.

6.3.3.2 Compliance with ARARs

6.3.3.2.1 Chemical-Specific ARARs

This alternative would comply with the chemical-specific ARARs for surface soils and sediment at LHAAP-29. Soil and sediment excavation will remove material that causes exceedance of the target cancer risk range and the non-cancer HI for the hypothetical future maintenance worker in these media. The removal of the source soils and sediment and plugging of the underground TNT wastewater and cooling water lines will positively impact groundwater by eliminating the potential for leaching of contaminants into soils and ultimately to groundwater at concentrations exceeding cleanup levels. Groundwater remediation under this alternative will ultimately achieve cleanup levels in both the shallow and intermediate zone under the industrial user scenario.

6.3.3.2.2 Location-Specific ARARs

The activities that will be conducted under this alternative will comply with all location-specific ARARs. No activities would take place in sensitive environments such as wetlands, and no impacts to archeological resources or threatened and endangered species are anticipated.

6.3.3.2.3 Action-Specific ARARs

The activities that will be conducted under this alternative will comply with all action-specific ARARs. Soil remediation will occur in compliance with all transportation and disposal requirements. Runoff control will be important during soil/sediment excavation. All runoff requirements will be met to protect Goose Prairie Creek and Central Creek.

6.3.3 Long-Term Effectiveness and Permanence

6.3.3.1 Magnitude of Residual Risks

Upon completion of source removal, the residual site risk will be within the target risk range and below an HI of 1 for the hypothetical future maintenance worker and within risk range for the ecological receptor. The implementation of LUCs under this alternative would prevent direct contact by human receptors with contaminated groundwater at LHAAP-29, thus minimizing the potential risk posed by groundwater contamination.

6.3.3.2 Adequacy and Reliability of Controls

The soil exposure risk at LHAAP-29 for a hypothetical future maintenance worker or ecological receptor will be removed by excavating the isolated contaminated soil and sediment areas and plugging the underground TNT wastewater and cooling water lines and abandonment of the cooling water line manholes.

Groundwater extraction and treatment will be effective for reducing COC concentrations to concentrations that can be addressed via natural attenuation. The extracted water will be treated at the existing LHAAP groundwater treatment plant, which has been operating successfully for several years. There are significant issues associated with the effectiveness of groundwater extraction, especially associated with the use of extraction wells. If the hydraulic conductivity is too low in the aquifer, groundwater extraction will be slow and ineffective. Small capture zones may lead to excessive time frames to capture the contamination. There are also maintenance issues associated with low flow conditions. If extraction wells go dry, it causes the pumps to overheat and fail to operate. A pre-design study may be needed to determine the optimum configuration of wells.

MNA will be implemented for groundwater in both the shallow zone and the intermediate zone. In the intermediate zone, it will be initiated after the extraction phase. The MNA evaluation (**Appendix C**) has demonstrated that natural attenuation can be effective in the shallow zone. Effectiveness of natural attenuation in the intermediate zone will depend on successful

completion of the in situ treatment. In both zones, long-term success will be ensured by monitoring that verifies that natural attenuation is actively occurring.

LUCs will prevent exposure to the groundwater COCs exceeding the cleanup levels in the intermediate zone during the time required to remediate the groundwater. The reliability of LUCs will depend on the maintenance of the controls. It is not anticipated that groundwater cleanup levels in either the shallow or intermediate zone will be met in the near future. Compliance with the risk-reduction goals will be monitored and performance of the controls will be assessed throughout the duration of this alternative. The assessment may indicate the need for components of this alternative to be repaired, modified, or replaced.

Consistent with the required 5-year CERCLA review, compliance with the risk-reduction goals would be monitored and performance of the controls will be assessed. The 5-year reviews may indicate the need for components of this alternative to be maintained, modified, or replaced.

6.3.3.4 Reduction of Toxicity, Mobility, or Volume through Treatment

This alternative satisfies the USEPA statutory preference for remedial actions that permanently reduce the toxicity, mobility, and volume of the contaminants and utilize treatment as a principal element. Implementation of groundwater extraction at LHAAP-29 would permanently reduce the toxicity, mobility, and volume of the groundwater contaminants in this area. Use of the current LHAAP plant would provide irreversible destruction of the COCs in the extracted groundwater from the intermediate zone. In both the shallow and intermediate groundwater zones, MNA will reduce the toxicity and volume through natural biological and chemical processes.

6.3.3.5 Short-Term Effectiveness

6.3.3.5.1 Protection of the Community during Remedial Action

This alternative is protective of the surrounding community during remedy implementation primarily because all activities would occur on site with very little disturbance of contaminated material. Truck traffic for equipment and materials, including the shipment of contaminated soil off site for disposal and on-site delivery of borrow material for backfilling, will occur. If a spill of contaminated soils, the spill would be easy to contain and would not impact the surrounding communities. During remediation activities at LHAAP-29, control of surface runoff will be important to avoid releases of contamination to adjacent surface water bodies.

6.3.3.5.2 Protection of Workers during Remedial Action

Some short-term risks to human health or the environment will exist during implementation of this alternative. The soil excavation activity has the potential for transportation or construction accidents. Additionally, this alternative will involve potential short-term risks to workers associated with the operation of drilling equipment and potential exposure to decontamination

fluids, contaminated groundwater, and excavated soil. Other risks to workers include those associated with extended operation of the LHAAP groundwater treatment plant plus risks common to construction activities (e.g., slips, trips, and falls).

The implementation of proper engineering controls and safety equipment will minimize potential short-term risks to remediation personnel conducting the installation of the groundwater extraction system and groundwater sampling activities. Measures will be taken to prevent the contact of personnel with the extracted groundwater. Remediation workers will conform to the site health and safety program and will be equipped with the necessary PPE. A site-specific health and safety plan will be prepared prior to implementing this alternative.

6.3.3.5.3 Short-Term Environmental Effects

Minor clearing and grubbing at LHAAP-29 will be required to effectively excavate the soil and to install extraction wells and pipelines for groundwater recovery. However, since these areas have been cleared in the past, it is unlikely that there are any sensitive species that will be impacted. If any sensitive areas are found, the appropriate regulation will be followed. The implementation of proper engineering controls will minimize the risk of environmental impacts.

6.3.3.5.4 Duration of Remedial Activities

In three years, the groundwater extraction system is expected to remove the highest concentrations of VOCs from LHAAP-29 intermediate groundwater zone, thus reducing the contaminant mass. After three years, the extraction wells will be used as monitoring wells, and monitoring will be implemented to demonstrate that any remaining VOCs in the intermediate zone are attenuated by natural processes. Perchlorate, VOCs, and explosive compounds detected in the shallow zone are also expected to attenuate by natural processes. Natural attenuation in each of the shallow and intermediate zones will be monitored quarterly for two years to evaluate its effectiveness. Then monitoring would continue semiannually for three years, then annually until the next CERCLA 5-year review. Monitoring will continue once every five years until cleanup levels are achieved. The natural attenuation evaluation (**Appendix C**) estimates that it would be approximately 70 years (due to 1,2-DCA) for complete attenuation for the shallow zone.

6.3.3.6 Implementability

6.3.3.6.1 Technical Feasibility

The limited amount of soil and sediment excavation is easy to implement once the area requiring excavation is defined and cleared. Plugging of the TNT transite wastewater and cooling water lines can be conducted without extensive intrusive activities. All equipment, services and materials are readily available to conduct the activities for this alternative. Considering the small quantity of soil with reasonably low levels of contamination requiring disposal, a disposal location will be available.

Minimal technical concerns exist that will hinder the implementation of this alternative. Routine inspection and maintenance of the LUCs would be required. All equipment, services and materials are readily available to conduct the activities for this alternative, and the LHAAP groundwater treatment plant is already operational. Low groundwater yield could decrease the effectiveness of the extraction system. A detailed pre-design study would be needed to determine the optimum configuration of wells for effective extraction of the LHAAP-29 groundwater.

6.3.3.6.2 Administrative Feasibility

All actions under this alternative would be implemented on the site and thus do not require permits, though substantive provisions of permits that would otherwise be required are considered to be ARARs. By legal agreement (i.e., the FFA), the U.S. Army shall submit to the USEPA and TCEQ a Responsiveness Summary and ROD. Following consideration of any comments by TCEQ, the ROD will be finalized jointly by the U.S. Army and USEPA, or if they are unable to reach agreement about the selection of the remedial action, by the USEPA administrator. By addressing the identified ARARs in the ROD and subsequent documents, it is anticipated that the alternative would adequately address all administrative barriers.

LUCs, although administratively implementable, would require the development of an implementation plan as part of the remedial design, and internal notices to relevant regulatory offices of the existence of the LUCs. Approval by the USEPA and the State of Texas is required prior to the modification or termination of LUCs, implementation actions, or modification of land-use by the U.S. Army. The U.S. Army must also seek concurrence from the USEPA and the State of Texas prior to any action that may disrupt the effectiveness of the LUCs or any action that may alter or negate the need for LUCs.

6.3.3.7 Cost

The total project present worth cost of Alternative 3 is approximately \$2.9 million. The details and a comparison of the cost estimates for all of the alternatives are presented in **Appendix E**.

6.3.4.7.1 Capital Cost

The total capital cost is estimated at approximately \$1.3 million. The capital costs include mobilization, excavation of soil material, plugging the underground pipes, installing the groundwater extraction system and on-site storage system, transportation and disposal of excavated soils, demobilization of construction activities and the activities associated with LUCs.

The capital costs also include a work plans, remedial design document, pre-design study and a closure report.

6.3.4.7.2 O&M Cost

The total O&M cost is estimated at approximately \$1.6 million. The O&M cost includes O&M for of the groundwater extraction and storage system for the intermediate groundwater zone, monitoring for MNA in the shallow and intermediate zones, monitoring to support the required CERCLA 5-year review process, and LUC surveillance to verify groundwater is not used until proposed cleanup levels are met.

6.4 Comparative Analysis of Alternatives

6.4.1 Introduction

This section presents a comparative analysis of the remedial alternatives for LHAAP-29 according to the CERCLA evaluation criteria described in **Section 6.2**. This analysis is the second stage of the detailed evaluation process and provides information that forms the basis for selecting a preferred remedy.

This comparative analysis considers two of the three criteria categories, the threshold criteria and primary balancing criteria. The threshold category contains two criteria that must be satisfied by the selected alternative:

- Overall protection of human health and the environment and
- Compliance with ARARs.

These criteria are important because they reflect the key statutory mandates of CERCLA. If an alternative does not satisfy both of these criteria, it is not eligible to be selected.

The primary balancing category contains five criteria under which the relative advantages and disadvantages of the alternatives are compared to determine the most appropriate remedy. The five criteria are the following:

- Long-term effectiveness and permanence;
- Reduction of toxicity, mobility, or volume through treatment;
- Short-term effectiveness;
- Implementability; and
- Cost

The comparison of these five criteria for the alternatives forms the basis of the comparative analysis. The first and second balancing criteria address the statutory preference for treatment as a principal element of the remedy. Together with the third and fourth criteria, they form the basis for determining the general feasibility of each alternative and for determining whether costs are proportional to the overall effectiveness.

The two modifying criteria, state and community acceptance, must be satisfied if the alternative is to be accepted. The modifying criteria of state and community acceptance are typically not evaluated until the public has had an opportunity to comment on the PP. Because specific alternatives have not been presented to the state and community, these two criteria are not formally compared in the FS.

A comparative analysis under the threshold and primary balancing criteria is presented in **Sections 6.4.2** and **6.4.3**, respectively, and is consistent with the format of the individual analysis of alternatives in **Section 6.3**.

6.4.2 Threshold Criteria

6.4.2.1 Overall Protection of Human Health and the Environment

The three alternatives provide varying levels of human health protection. The “no action” alternative (Alternative 1) would not be protective of human health or the environment as no remedial activities or LUCs would be conducted. Alternative 1 does not achieve RAOs and provides the least protection of all the alternatives; it provides no reduction in risks to human health or the environment because no measures would be implemented to eliminate pathways for human and ecological exposure.

Alternatives 2 and 3 both satisfy the RAOs for LHAAP-29 and provide access and use restrictions for residual contamination. Alternatives 2 and 3 rely heavily on LUCs to prevent access to the shallow groundwater zone until cleanup levels are achieved. Both Alternatives 2 and 3 provide treatment of the primary COC for human health in the intermediate zone.

6.4.2.2 Compliance with ARARs

Alternative 1 does not comply with chemical-specific ARARs as no remediation of groundwater will be conducted. Alternatives 2 and 3 comply with all chemical-specific ARARs for soil and groundwater, as well as the location-specific and action-specific ARARs.

6.4.3 Primary Balancing Criteria

6.4.3.1 Long-Term Effectiveness and Permanence

Alternative 1 would be the least effective and permanent in the long term. Under this alternative, no contaminant removal or treatment would take place and no measures would be implemented to control exposure risks posed by contaminated surface soil and groundwater at LHAAP-29.

Alternatives 2 and 3 would significantly and permanently reduce groundwater contaminant concentrations to the applicable cleanup levels and, therefore, provide long-term effectiveness and permanence. Should in situ chemical oxidation or groundwater extraction be considered ineffective after implementation, the remedy or the cleanup levels may need to be re-evaluated.

Alternatives 2 and 3 both rely on MNA and LUCs until the proposed cleanup levels are achieved.

Alternative 2 provides a slightly higher level of effectiveness than Alternative 3 since the intermediate groundwater zone would reach concentrations amenable to natural attenuation in a shorter time frame. By requiring a shorter time frame, Alternative 2 allows the opportunity to evaluate the impact of the in situ treatment and re-inject if necessary.

6.4.3.2 Reduction of Toxicity, Mobility, or Volume through Treatment

Alternatives 2 and 3 both provide a large degree of permanent reduction in toxicity and volume of the groundwater contaminants while Alternative 1 provides no attempt at reduction.

6.4.3.3 Short-Term Effectiveness

Because Alternative 1 does not involve remedial measures, no short-term risk to remediation workers, the local community, or the environment would exist. Alternatives 2 and 3 involve material excavation and off-site disposal, which represent a greater exposure potential to remediation workers, a greater potential for runoff releases to the environment, and the potential for off-site traffic accidents and impacts on communities between LHAAP and the disposal facility. Additionally, Alternatives 2 and 3 both involve potential short-term risks to workers associated with exposure to contaminated groundwater from monitoring and/or operation of drilling/construction equipment.

Alternative 2 has short-term risks due to remediation workers constructing and operating an in situ treatment system, including the handling of chemical oxidants. Both Alternatives 2 and 3 have short-term risks associated with increased operations at the LHAAP groundwater treatment system, which includes chemical handling (caustic acids) and operation of a high-temperature catalytic oxidizer. However, Alternative 3 is estimated to have a longer operation period (3 years) than Alternative 2 (6 months).

By planning the construction, excavation, and transportation activities in accordance with industry and OSHA codes and requirements, risks from contaminant exposure and construction operations would be controlled to acceptable levels. Sediment deposition into adjacent surface water bodies can be controlled during earthwork and construction activities. Erosion control measures would include surface grading; emplacement of silt fences; covering surfaces with straw, mulch, riprap, and/or geotextile fabrics. Following completion of all construction and excavation, disturbed areas would be regraded with clean backfill and revegetated with native grasses.

6.4.3.4 Implementability

Administratively, all of the alternatives are implemental. Under Alternative 1, no remedial action would be taken. Therefore, no difficulties or uncertainties would be associated with its implementation.

For Alternatives 2 and 3, soil excavation would require coordination between excavation, sampling, transportation, and disposal. For groundwater, Alternatives 2 and 3 are also technically implementable, but there are uncertainties associated with hydrogeologic conditions that may impact the ability of in situ chemical oxidation or groundwater extraction to lower contaminant levels sufficiently to reach concentrations amenable to MNA. Alternative 3 would be somewhat more difficult to implement than Alternative 2 from a technical standpoint due to the increased duration (six months for Alternative 2 compared to three years for Alternative 3) that would be required to convey the contaminated groundwater to the existing LHAAP groundwater treatment plant.

6.4.3.5 Cost

Cost estimates are used in the CERCLA FS process to eliminate those remedial alternatives that are significantly more expensive than competing alternatives without offering commensurate increases in performance or overall protection of human health or the environment. The cost estimates developed are preliminary estimates with an intended accuracy range of +50 to -30 percent. Final costs will depend on actual labor and material costs, actual site conditions, productivity, competitive market conditions, final scope, final schedule, final engineering design, and other variables.

Costs developed are capital costs (including fixed-price remedial construction) and long-term O&M costs (post-remediation). Overall 30-year present worth costs are developed for each alternative assuming a discount rate of 2.8 percent. Total project present worth costs for each alternative is presented in **Appendix E**.

The progression of present worth costs from the least expensive alternative to the most expensive alternative is as follows: Alternative 1, Alternative 3, and Alternative 2. No costs are associated with Alternative 1 because no remedial activities would be conducted. Alternative 3 has the highest O&M costs associated with the estimated 3-year extraction period. Alternative 2 has the highest present worth and capital costs primarily due to the activities associated with the injection phase of the in situ chemical oxidation. Alternative 3 costs would be higher if there was no existing LHAAP groundwater treatment system.

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Appendix A

Investigation Results – 2004 and 2005

Appendix A Investigation Results – December 2004 and February 2005

1.0 Introduction

Shaw Environmental, Inc. (Shaw) performed additional field investigation activities at LHAAP-29 in December 2004 and February 2005 to further define the extent of perchlorate and explosives in soil, sediment, and water. Also in February 2005, the USACE collected soil samples near building foundations for explosives analysis. The numbers of samples and the types of analyses are summarized in **Table A-1** and the sample locations are provided in **Figures A-1** and **A-2**.

2.0 Shaw Investigation Activities

In December 2004 and February 2005, Shaw collected ten soil, 3 sediment, 8 solid residue, and 15 water samples at various locations to assess the affect of explosives in or near former wastewater drainage lines, ditches, and a pond. The ten soil samples were collected at five separate locations (29SB81 through 29SB85) at depth intervals of 4 to 5, and 8 to 9 feet below ground surface (bgs). These locations were adjacent to wash house sumps at five of the six previously active former 2,4,6-trinitrotoluene (TNT) production lines. Twelve soil samples (two from each of the six sump locations) were initially proposed, in accordance with the Addendum 3, *Additional Investigation, LHAAP-29 and LHAAP-49, Final Work Plan, Groundwater Data Gaps Investigation Groups 2 and 4* (Addendum 3, Additional Investigation) (Shaw, 2004a). One soil boring location, however, was submerged in water and drilling at this location was not practical. Eight solid residue and twelve water samples were collected from manholes around the site. Originally, a total of 12 manholes were proposed to be sampled for solid residue and surface water; however, one manhole (MH-04) was collapsed and no samples were collected from this location. Additionally, no solid residue samples were collected from manholes MH-01, MH-03, and MH-11 due to a lack of solid residue. Due to dry conditions during the December 2004 sampling activities, water samples were collected only from manholes MH-01, MH-02, and MH-09. In February 2005, additional water samples were collected from MH-03, and MH-05 through MH-12. One sediment sample and one surface water sample were collected from the outfall ditch that received water from the cooling water drain lines. The remaining two sediment and two surface water samples were collected from the pond that exists at the location of the former pump house for the wastewater (red/yellow liquor) collection system.

Shaw also collected 12 soil samples (three in each of four soil borings) to examine the vertical and horizontal extent of perchlorate contamination in two areas in the northern portion of LHAAP-29. Two of the four borings, 29SB88 and 29SB89, were advanced through the slab at the location of the former rocket motor washout building. Three samples were collected from each boring. One sample was collected from immediately beneath the slab, one sample was collected from a depth of 4 to 5 feet beneath the previous sample, and one sample was collected immediately above the water table. Borings 29SB86 and 29SB87 were advanced in an area approximately 600 feet southwest of the former rocket motor washout building where perchlorate had been detected in the soil during earlier investigations. Samples from these borings were collected at depth intervals of 0 to 0.5 feet bgs, 6 to 8 feet bgs, and immediately above the water table.

The analytical results for the December 2004 and February 2005 investigations at LHAAP-29 are provided in **Tables A-2, A-3, and A-4**, for soil, sediment and solid residue, and water, respectively. Results for one explosive analyte (TNT) are also presented on **Figure A-1**, and results for perchlorate are presented on **Figure A-2**.

2.1 *Sampling and Analysis*

This section describes the sampling and analysis procedures applicable to water, sediment, solid residue, and soil samples collected. Samples were collected and handled in accordance with TERC Standard Operating Procedure 1111, Sample Handling (IT Corporation/OHM Remediation Services Corp., 2002). Samples were analyzed on a 7-day turnaround time. Health and safety procedures, including screening methods, are described in the Site Safety and Health Plan, Appendix A of the Final Work Plan (Shaw, 2004b).

2.1.1 *Soil Sampling*

Soil samples were collected at the boring locations identified in **Figures A-1 and A-2**. Two to three soil samples were collected from each boring location. Soil borings were advanced using a direct push technology (DPT) rig. The DPT method involved the use of a high-capacity hydraulic ram mounted on an all-terrain vehicle to advance a drive sampler attached to steel push rods. At two locations (29SB88 and 29SB89), concrete slabs were penetrated using a concrete boring tool. Soil samples were collected continuously during DPT operation using a 24- to 36-inch-long sampler with a disposable liner. The depths of the borings were based on Addendum 3, Additional Investigation (Shaw, 2004a).

Boring locations were marked with a stake, where practical, and a Global Positioning System (GPS) device was used to obtain location coordinates. Site personnel covered the tailgate of a pick-up truck with plastic sheeting and used it as a sample preparation area. Field analytical and health and safety instruments were calibrated and recorded within the field logbook. New

disposable gloves were donned between each sampling interval to prevent cross-contamination. The sampling equipment was decontaminated as described in Section 4.5 in the Chemical Data Acquisition Plan, Appendix C of the Final Work Plan (Shaw, 2004b). The drilling operations observed proper safety, sampling, and drilling methods. When the soil sample was received from the driller, the soil-filled sampler was opened, the sample liner was removed from the barrel, the liner was cut open, and the sample liner was placed on the plastic sheeting. The entire length of material from the barrel was described according to ASTM D2488-93, "Standard Practice for Description and Identification of Soils (Visual-Manual Procedure)" (ASTM International, 2004) and recorded on the standard Drilling Log Form. After verifying the appropriate sampling intervals, composite soil samples were placed in a container. Each sample container was labeled as described in Section 4.6.2 of the Chemical Data Acquisition Plan (Shaw, 2004b), enclosed in a sealable plastic bag, and placed in a cooler containing ice. This procedure was repeated for each interval to the total boring depth. Drilling activities and sampling procedures were recorded on a Field Sampling Report or logbook. COC documentation was completed and a photographic record of sample locations was maintained. Cuttings were disposed into the same borehole and the hole was grouted to surface. Decontamination fluids were disposed at the LHAAP-18/24 groundwater treatment plant. The samples were placed in 4-ounce wide-mouth glass containers, preserved on ice at a temperature of 4 degrees Celsius or less, and delivered to the analytical laboratory for analysis using EPA methods SW 8330 or EPA 314.0 for explosives or perchlorate, respectively.

Field duplicates (quality control samples) were collected and analyzed to assess the precision for the field sampling and laboratory analytical process. Each field duplicate was collected by filling a second sample container in rapid succession after collecting the primary soil sample. Duplicates were collected for samples 29SB85-001 and 29SB85-002.

2.1.2 Sediment and Solid Residue Sampling

Sediment was collected at the locations identified in **Figure A-1**. A sampling site was prepared by laying plastic sheeting on the adjacent ground. Field equipment and instruments were calibrated to verify they were in proper working order and calibration values were recorded in the field logbook. New disposable gloves were donned between samples to prevent cross-contamination. The sampling equipment was decontaminated as described in Section 4.5 in the Chemical Data Acquisition Plan (Shaw, 2004b). Information, deviations from procedures, and rationale for changes were recorded in the field logbook. Coordinates of each sampling location were recorded using a GPS unit.

The sediment sampling interval was 0 to 0.5 feet bgs. In manholes with concrete or masonry floors, the solid residue sample was limited to soil-like material that had collected atop the floor.

One sediment or solid residue sample was collected from each proposed location as stated in Addendum 3, Additional Investigation (Shaw, 2004a).

Sediment was placed into a clean stainless steel bowl and thoroughly mixed with a clean stainless steel spoon. At the manholes, a decontaminated trowel was attached to a 12-foot extension handle. Sediment was retrieved using this device, mixed, and placed in a 4-ounce glass container. An organic vapor meter was used to check for volatile organic compounds and record readings in the field logbook. The sample containers were filled directly from the tray or bowl with the spatula or spoon. As many stones, twigs, grass, etc., were removed from the sample as possible. If the sample was water saturated, the water was carefully decanted from the container with minimal disturbance to the sample. The sample was transferred directly from the sampler to the sample container leaving no headspace. Using wide, clear tape, the label was covered and the container was placed in a sealed plastic bag, and immediately placed in an iced cooler. Location coordinates were obtained using a GPS for the sediment sample locations. The location, sample-depth, and/or field measurements were recorded in the field logbook. COC documentation was completed and a photographic record was maintained. The samples were placed in 4-ounce glass containers, preserved on ice at a temperature of 4 degrees Celsius or less, and delivered to the analytical laboratory for analysis using EPA Method SW 8330 for explosives.

A field duplicate (quality control sample) was collected and analyzed to assess the precision for the field sampling and laboratory analytical process. The field duplicate was collected by filling a second sample container in rapid succession after collecting the primary sample. The duplicate was collected for sample 29SD640-MH09.

2.1.3 Surface Water Sampling

Surface water samples were collected at the locations shown in **Figure A-1**. A sampling site was prepared by laying plastic sheeting on the adjacent ground. Field equipment and instruments were calibrated to verify they were in proper working order and calibration values were recorded in the field logbook. Shaw personnel recorded a description of the site and sampling locations, including the coordinates of the sampling locations based on a GPS unit and/or site maps. Personal protective equipment was donned as required and specified in the Site Safety and Health Plan (Shaw, 2004b). New disposable gloves were donned prior to initializing sampling activities. The water samples were usually collected at locations where sediment samples were also collected. At those locations, the water sample was collected first. Water samples were collected in one of three ways:

- Surface water samples from the pond and the ditch were collected in open containers.

- Manhole water samples were collected in December 2004 using a clean/decontaminated 2-inch-diameter PVC sampler with a valve.
- Manhole water samples were collected in February 2005 using a peristaltic pump with clean/decontaminated tubing.

The sampling procedures were recorded on a field logbook. General water quality parameters (e.g., pH, conductivity, temperature, oxidation/reduction potential, turbidity) were measured using field instruments and recorded on the field logbook. COC documentation was completed and a photographic record was maintained. The sample was placed in a 1-liter amber bottle, preserved on ice at a temperature of 4 degrees Celsius or less, and shipped to the laboratory for analysis. Explosives were analyzed using EPA Method SW 8330.

Two field duplicates were collected and analyzed to assess the precision for the field sampling and laboratory analytical process. The field duplicates were collected by filling two separate 1-liter glass amber containers in rapid succession after collecting the primary water sample. Duplicates were collected for samples 29WL40-MH09 and 29WL40-MH09-02.

2.2 Results

The December 2004 and February 2005 results for explosives and perchlorate in the soil, sediment, and water samples from LHAAP-29 are presented in **Tables A-2, A-3, and A-4**. The associated data evaluation reports are included as **Attachment 1** of this document.

2.2.1 Explosives Results

Explosives were analyzed in soil, sediment, solid residue, and water samples collected throughout LHAAP-29. The soil samples were associated with the wash house sumps, while the sediment, solid residue, and water samples were associated either with the pond, the cooling water outfall ditch, or the cooling water manholes.

The explosives soil sample results in the soil near the sumps were largely non-detects, with a detection limit of 200 µg/kg. Of the 14 explosives parameters analyzed in ten primary samples and 2 field duplicates, there were six detected results. These included TNT at 4 to 5 feet bgs at 29SB83 (430 µg/kg), 2-amino-4,6-dinitrotoluene (DNT) at 4 to 5 feet bgs at 29SB85 (230J µg/kg), and both 2-amino-4,6-DNT (900 µg/kg) and 4-amino-2,6-DNT (300J µg/kg) at 8 to 9 feet bgs at 29SB85. The remaining two detections were in the field duplicate for the 8- to 9-foot-interval at 29SB85.

In the two sediment samples at the pond, the only detection was 410 µg/kg TNT at 29SD43-MH12 and 29SD45; the detection limit was 200 µg/kg. The two surface water samples had detections of TNT (0.4J and 0.39J µg/L), 2-amino-4,6-DNT (0.56J and 0.53J µg/L), and

4-amino-2,6-DNT (2 and 1.9 $\mu\text{g/L}$) at 29SW44 and 29SW45, respectively; the detection limit was 0.2 $\mu\text{g/L}$.

The highest results for both sediment and soil during the investigation were at the cooling water outfall ditch. The sediment sample (29SD46) had 26,000,000 $\mu\text{g/kg}$ TNT and 8,000,000 $\mu\text{g/kg}$ 2,4-DNT. The associated water sample (29SW46) had 860 $\mu\text{g/L}$ TNT. Both samples had detections for other explosives, at lower concentrations.

Several explosives (1,3,5-trinitrobenzene; TNT; 2,4-DNT; 2,6-DNT; 2-amino-4,6-DNT; and 4-amino-2,6-DNT) were detected in both the water and solid residue from the cooling water manholes. Explosives were detected at low concentrations in solid residue samples from six of the eight cooling water manholes that were sampled. The highest solid residue result was 11,000 $\mu\text{g/kg}$ TNT at manhole MH-02. The next highest results were for degradation products (9,000 $\mu\text{g/kg}$ 2-amino-4,6-DNT and 7800 $\mu\text{g/kg}$ 4-amino-2,6-DNT) at MH-10. The 12 water samples from the manholes had detected results for explosives, though the magnitude of the results varied several orders of magnitude. The highest explosives concentration from the water samples was 5,200 $\mu\text{g/L}$ TNT in manhole MH-09, which also had detections of 27 $\mu\text{g/L}$, 220 $\mu\text{g/L}$, and 290 $\mu\text{g/L}$ of 2,6-DNT, 2-amino-4,6-DNT, and 4-amino-2,6-DNT, respectively. MH-09 was sampled again in February 2005 and had a TNT result of 20 $\mu\text{g/L}$ at that time.

2.2.2 Perchlorate Results

Perchlorate was detected in five of the 12 soil samples collected at two areas in the northeastern portion of LHAAP-29. The detections at LHAAP-29 varied from 40.3 $\mu\text{g/kg}$ to 8,600 $\mu\text{g/kg}$. However, due to interferences, the detection limits of the non-detect results varied from 114 to 267 $\mu\text{g/kg}$. The highest results were not found at the two borings drilled through the slab at the former rocket motor washout facility, but at boring 29SB86. That boring location was chosen because of elevated perchlorate results in earlier investigations. As shown in **Figure A-2**, the results at 29SB86 varied from 40.3 $\mu\text{g/kg}$ at the surface to 8,600 $\mu\text{g/kg}$ at 6-8 feet bgs to 689 $\mu\text{g/kg}$ at 20-21 feet bgs (just above the water table). The 8,600 $\mu\text{g/kg}$ value exceeds perchlorate results in soil from earlier investigations at LHAAP-29.

3.0 USACE Investigation Activities

Plexus (Plexus, 2005) reported stained soil in the vicinity of wash house Building 806-D, possibly caused by explosives, such as TNT. On February 9 and 10, 2005, the USACE collected samples of soil at the foundation of Wash House 806-D and submitted them for explosives analysis (USACE, 2005). The results are presented in **Table A-5**.

The concrete foundation was cored in two places on the western end of the wash house. The western end of each wash house is the downgradient end and could be expected to have received runoff from settling tanks that were once housed in each wash house. Location 29DLineWHC01 was at a crack in the slab. The second location 29DLineWHC02, was slightly north and downgradient of the first core. The soil beneath the cores was slightly sandy with high clay content. The third sample was collected along the edge of the foundation at the most western end of the wash house slab. The soil was visually inspected at several locations along the foundation, and sample 29DLineWHW01 was collected at the location with the most obvious staining. **Figure A-3** indicates the sample locations.

The soil samples at the cored locations had no detected results for explosives. The sample from the edge of the foundation had detected results for four explosives parameters; the highest result was 27,300 µg/kg TNT.

4.0 References

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Tables

Table A-1
December 2004/February 2005 Sampling and Analyses
LHAAP-29

Media	Sample Locations	Primary Samples	Field Duplicates	Analytical Suite	Results Table
Soil					
Soil Near Wash House Sumps	29SB81-29SB85	10	2	Explosives	A-2
Soil in Perchlorate Areas	29SB86-29SB89	12	0	Perchlorate	A-2
Sediment					
Pond Sediment	29SD44, 29SD45	2	0	Explosives	A-3
Outfall Ditch Sediment	29SD46	1	0	Explosives	A-3
Manhole Solid Residue	29SD33, 29SD36-29SD41, 29SD43 (Manholes 2, 5-10, and 12)	8	1	Explosives	A-3
Water					
Pond Surface Water	29SW44, 29SW45	2	0	Explosives	A-4
Outfall Ditch Surface Water	29SW46	1	0	Explosives	A-4
Manhole Water	Manholes 1-3 and 5-12	12	2	Explosives	A-4

Table A-2
Soil Sampling Results
2004 Soil Investigation
LHAAP-29

Sample Location	29SB81						29SB81						29SB82						29SB82						29SB83						29SB83					
Sample ID	29SB81-001						29SB81-002						29SB82-001						29SB82-002						29SB83-001						29SB83-002					
Sample Date	16-Dec-04						16-Dec-04						15-Dec-04						15-Dec-04						15-Dec-04						15-Dec-04					
Sample Depth	4-5 ft bgs						8-9 ft bgs						4-5 ft bgs						8-9 ft bgs						4-5 ft bgs						8-9 ft bgs					
Sample Type	REG						REG						REG						REG						REG						REG					
Parameter	Units	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF
Explosives																																				
1,3,5-Trinitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
1,3-Dinitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
2,4,6-Trinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	430				1	200	U	U		1
2,4-Dinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
2,6-Dinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
2-Amino-4,6-dinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
4-Amino-2,6-dinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
HMX	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
m-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
Nitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
o-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
p-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
RDX	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
Tetryl	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
Anions																																				
Perchlorate	µg/kg																																			

Notes can be found on last page of this table

Table A-2
Soil Sampling Results
2004 Soil Investigation
LHAAP-29

Sample Location	29SB84						29SB84						29SB85						29SB85						29SB85						
Sample ID	29SB84-001						29SB84-002						29SB85-001						29SB85-001-FD						29SB85-002						
Sample Date	15-Dec-04						15-Dec-04						15-Dec-04						15-Dec-04						15-Dec-04						
Sample Depth	4-5 ft bgs						8-9 ft bgs						4-5 ft bgs						4-5 ft bgs						8-9 ft bgs						
Sample Type	REG						REG						REG						FD						REG						
Parameter	Units	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF
Explosives																															
1,3,5-Trinitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
1,3-Dinitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
2,4,6-Trinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
2,4-Dinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
2,6-Dinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
2-Amino-4,6-dinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	230	J	J	15	1	200	U	U		1	900				1	830				1
4-Amino-2,6-dinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	300	J	J	15	1	240	J	J	15	1
HMX	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
m-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
Nitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
o-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
p-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
RDX	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
Tetryl	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
Anions																															
Perchlorate	µg/kg																														

Notes can be found on last page of this table

Table A-2
Soil Sampling Results
2004 Soil Investigation
LHAAP-29

Sample Location		29SB86					29SB86					29SB86					29SB87					29SB87					29SB87					
Sample ID		29SB86-001					29SB86-002					29SB86-003					29SB87-001					29SB87-002					29SB87-003					
Sample Date		14-Dec-04					14-Dec-04					14-Dec-04					14-Dec-04					14-Dec-04					14-Dec-04					
Sample Depth		0-0.5 ft bgs					6-8 ft bgs					20-21 ft bgs					0-0.5 ft bgs					6-8 ft bgs					19-20 ft bgs					
Sample Type		REG					REG					REG					REG					REG					REG					
Parameter	Units	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	
Explosives																																
1,3,5-Trinitrobenzene	µg/kg																															
1,3-Dinitrobenzene	µg/kg																															
2,4,6-Trinitrotoluene	µg/kg																															
2,4-Dinitrotoluene	µg/kg																															
2,6-Dinitrotoluene	µg/kg																															
2-Amino-4,6-dinitrotoluene	µg/kg																															
4-Amino-2,6-dinitrotoluene	µg/kg																															
HMX	µg/kg																															
m-Nitrotoluene	µg/kg																															
Nitrobenzene	µg/kg																															
o-Nitrotoluene	µg/kg																															
p-Nitrotoluene	µg/kg																															
RDX	µg/kg																															
Tetryl	µg/kg																															
Anions																																
Perchlorate	µg/kg	40.3				1	8600				100	689			2	117	U	U		10	57	U	U		5	122	U	U		10		

Notes can be found on last page of this table

Table A-2
Soil Sampling Results
2004 Soil Investigation
LHAAP-29

Sample Location		29SB88					29SB88					29SB88					29SB89					29SB89					29SB89				
Sample ID		29SB88-001					29SB88-002					29SB88-003					29SB89-001					29SB89-002					29SB89-003				
Sample Date		14-Dec-04					14-Dec-04					14-Dec-04					15-Dec-04					15-Dec-04					15-Dec-04				
Sample Depth		0-1 ft bgs					4-5 ft bgs					15-16 ft bgs					0-0.5 ft bgs					4-5 ft bgs					12-13 ft bgs				
Sample Type		REG					REG					REG					REG					REG					REG				
Parameter	Units	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF
Explosives																															
1,3,5-Trinitrobenzene	µg/kg																														
1,3-Dinitrobenzene	µg/kg																														
2,4,6-Trinitrotoluene	µg/kg																														
2,4-Dinitrotoluene	µg/kg																														
2,6-Dinitrotoluene	µg/kg																														
2-Amino-4,6-dinitrotoluene	µg/kg																														
4-Amino-2,6-dinitrotoluene	µg/kg																														
HMX	µg/kg																														
m-Nitrotoluene	µg/kg																														
Nitrobenzene	µg/kg																														
o-Nitrotoluene	µg/kg																														
p-Nitrotoluene	µg/kg																														
RDX	µg/kg																														
Tetryl	µg/kg																														
Anions																															
Perchlorate	µg/kg	74.5				1	133	U	U		10	64.4	U	U		5	60.2	U	U		5	63.9	U	U		5	144			1	

Notes:

µg/kg - micrograms per kilogram

DF - dilution factor

FD - field duplicate

ft bgs - feet below ground surface

J - The analyte was positively identified; the reported value is the estimated concentration of the constituent detected in the sample analyzed.

Qual - qualifier

RC - reason code

15 - quantitation

REG - regular

U - Not detected. The analyte was analyzed for, but not detected above the associated reporting limit.

ValQual - validation qualifier

Table A-3
Sediment and Solid Residue Sampling Results
2004 Investigation
LHAAP-29

Sample Location		29SD33-MH02					29SD36-MH05					29SD37-MH06					29SD38-MH07					29SD39-MH08					29SD40-MH09				
Sample ID		29SD33-MH02					29SD36-MH05					29SD37-MH06					29SD38-MH07					29SD39-MH08					29SD40-MH09				
Sample Date		17-Dec-04					17-Dec-04					17-Dec-04					16-Dec-04					16-Dec-04					17-Dec-04				
Sample Depth		0-0.3 ft bgs					0-0.3 ft bgs					0-0.3 ft bgs					0-0.3 ft bgs					0-0.3 ft bgs					0-0.3 ft bgs				
Sample Type		REG					REG					REG					REG					REG					REG				
Parameter	Units	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF
Explosives																															
1,3,5-Trinitrobenzene	µg/kg	440				1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
1,3-Dinitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
2,4,6-Trinitrotoluene	µg/kg	11000				5	200	U	U		1	290	J	J	15	1	630				1	5500				1	1200				1
2,4-Dinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	710				1	200	U	U		1
2,6-Dinitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	300	J	J	15	1	200	U	U		1
2-Amino-4,6-dinitrotoluene	µg/kg	3800		J	17	1	200	U	UJ	17	1	290	J	J	17, 15	1	200	U	U		1	1200				1	2400		J	17	1
4-Amino-2,6-dinitrotoluene	µg/kg	2600		J	17	1	200	U	UJ	17	1	260	J	J	17, 15	1	200	U	U		1	880				1	2500		J	17	1
HMX	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
m-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
Nitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
o-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
p-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
RDX	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1
Tetryl	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1

Notes can be found on the last page

Table A-3
Sediment and Solid Residue Sampling Results
2004 Investigation
LHAAP-29

Sample Location		29SD40-MH09					29SD41-MH10					29SD43-MH12					29SD44					29SD45					29SD46					
Sample ID		29SD40-MH09-FD					29SD41-MH10					29SD43-MH12					29SD44					29SD45					29SD46					
Sample Date		17-Dec-04					16-Dec-04					17-Dec-04					19-Dec-04					19-Dec-04					16-Dec-04					
Sample Depth		0-0.3 ft bgs					0-0.3 ft bgs					0-0.3 ft bgs					0-0.5 ft bgs					0-0.5 ft bgs					0-0.5 ft bgs					
Sample Type		FD					REG					REG					REG					REG					REG					
Parameter	Units	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	
Explosives																																
1,3,5-Trinitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	2000	U	U		10	
1,3-Dinitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	2000	U	U		10	
2,4,6-Trinitrotoluene	µg/kg	1100				1	7000				1	410				1	200	U	U		1	410				1	26000000				5000	
2,4-Dinitrotoluene	µg/kg	200	U	U		1	1100				1	200	U	U		1	200	U	U		1	200	U	U		1	8000000				5000	
2,6-Dinitrotoluene	µg/kg	200	U	U		1	240	J	J	15	1	200	U	U		1	200	U	U		1	200	U	U		1	15000				10	
2-Amino-4,6-dinitrotoluene	µg/kg	470		J	17	1	9000				10	200	U	UJ	17	1	200	U	U		1	200	U	U		1	48000				10	
4-Amino-2,6-dinitrotoluene	µg/kg	460		J	17	1	7800				1	200	U	UJ	17	1	200	U	U		1	200	U	U		1	2000	U	U		10	
HMX	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	2000	U	U		10	
m-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	2000	U	U		10	
Nitrobenzene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	2000	U	U		10	
o-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	2000	U	U		10	
p-Nitrotoluene	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	2000	U	U		10	
RDX	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	2000	U	U		10	
Tetryl	µg/kg	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	200	U	U		1	2000	U	U		10	

Notes:

µg/kg - micrograms per kilogram

DF - dilution factor

FD - field duplicate

ft bgs - feet below ground surface

J - The analyte was positively identified; the reported value is the estimated concentration of the constituent detected in the sample analyzed.

Qual - qualifier

RC - reason code

15 - quantitation

17 - field duplicate RPD criteria is exceeded

REG - regular

U - Not detected. The analyte was analyzed for, but not detected above the associated reporting limit.

ValQual - validation qualifier

Table A-4
Water Sampling Results
2004 Investigation/2005 Investigation
LHAAP-29

Sample Location		29SW44					29SW45					29SW46					29WL32-MH01					29WL33-MH02					29WL34-MH03				
Sample ID		29SW44-041219					29SW45-041219					29SW46-041216					29WL32-MH01					29WL33-MH02					29WL34-MH03-02				
Sample Date		19-Dec-04					19-Dec-04					16-Dec-04					15-Dec-04					15-Dec-04					24-Feb-05				
Sample Depth		-					-					-					-					-					-				
Sample Type		REG					REG					REG					REG					REG					REG				
Parameter	Units	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF
Explosives																															
1,3,5-Trinitrobenzene	µg/L	0.2	U	U		1	0.2	U	U		1	0.73		J	15	1	0.2	U	U		1	0.2	U	U		1	0.263	U	UJL	07A	1
1,3-Dinitrobenzene	µg/L	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.263	U	UJL	07A	1
2,4,6-Trinitrotoluene	µg/L	0.4	J	J	15	1	0.39	J	J	15	1	860				100	250				50	0.93	J	J	15	1	23		JL	07A	5
2,4-Dinitrotoluene	µg/L	0.2	U	U		1	0.2	U	U		1	19				10	15				5	0.2	U	U		1	0.263	U	UJL	07A	1
2,6-Dinitrotoluene	µg/L	0.2	U	U		1	0.2	U	U		1	7.6				1	4.1				1	0.2	U	U		1	0.263	U	UJL	07A	1
2-Amino-4,6-dinitrotoluene	µg/L	0.56	J	J	15	1	0.53	J	J	15	1	20				10	16				5	3.4				1	1.19		JL	07A	1
4-Amino-2,6-dinitrotoluene	µg/L	2				1	1.9				1	48				10	33				5	6.1				1	2.13		JL	07A	1
HMX	µg/L	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.263	U	UJL	07A	1
m-Nitrotoluene	µg/L	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.263	U	UJL	07A	1
Nitrobenzene	µg/L	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.263	U	UJL	07A	1
o-Nitrotoluene	µg/L	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.263	U	UJL	07A	1
p-Nitrotoluene	µg/L	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.263	U	UJL	07A	1
RDX	µg/L	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.263	U	UJL	07A	1
Tetryl	µg/L	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.2	U	U		1	0.263	U	UJL	07A	1

Notes can be found on last page of this table

Table A-4
Water Sampling Results
2004 Investigation/2005 Investigation
LHAAP-29

Sample Location		29WL36-MH05						29WL37-MH06						29WL38-MH07						29WL39-MH08						29WL40-MH09						29WL40-MH09					
Sample ID		29WL36-MH05-02						29WL37-MH06-02						29WL38-MH07-02						29WL39-MH08-02						29WL40-MH09						29WL40-MH09-02					
Sample Date		24-Feb-05						24-Feb-05						23-Feb-05						23-Feb-05						17-Dec-04						23-Feb-05					
Sample Depth		-						-						-						-						-						-					
Sample Type		REG						REG						REG						REG						REG						REG					
Parameter	Units	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	
Explosives																																					
1,3,5-Trinitrobenzene	µg/L	0.26	U	UJL	07A	1	1.34		JL	07A	1	0.26	U	U		1	0.258	U	U		1	0.2	U	U		1	0.266	U	U						1		
1,3-Dinitrobenzene	µg/L	0.26	U	UJL	07A	1	0.26	U	UJL	07A	1	0.26	U	U		1	0.258	U	U		1	0.2	U	U		1	0.266	U	U						1		
2,4,6-Trinitrotoluene	µg/L	84.3		JL	07A	10	430		JL	07A	100	0.955	J	J	15	1	6.36				1	5200				500	20								5		
2,4-Dinitrotoluene	µg/L	0.26	U	UJL	07A	1	0.26	U	UJL	07A	1	0.26	U	U		1	0.258	U	U		1	0.8	J	J	15	1	1.13								1		
2,6-Dinitrotoluene	µg/L	0.26	U	UJL	07A	1	0.26	U	UJL	07A	1	0.26	U	U		1	0.258	U	U		1	27				20	1.27								1		
2-Amino-4,6-dinitrotoluene	µg/L	1.82		JL	07A	1	6.27		JL	07A	1	0.428	J	J	15	1	1.29				1	220				20	1.68								1		
4-Amino-2,6-dinitrotoluene	µg/L	2.74		JL	07A	1	8.15		JL	07A	1	0.364	J	J	15	1	1.7				1	290				20	2.42								1		
HMX	µg/L	0.26	U	UJL	07A	1	0.26	U	UJL	07A	1	0.26	U	U		1	0.258	U	U		1	0.2	U	U		1	0.266	U	U						1		
m-Nitrotoluene	µg/L	0.26	U	UJL	07A	1	0.26	U	UJL	07A	1	0.26	U	U		1	0.258	U	U		1	0.2	U	U		1	0.266	U	U						1		
Nitrobenzene	µg/L	0.26	U	UJL	07A	1	0.26	U	UJL	07A	1	0.26	U	U		1	0.258	U	U		1	0.2	U	U		1	0.266	U	U						1		
o-Nitrotoluene	µg/L	0.26	U	UJL	07A	1	0.26	U	UJL	07A	1	0.26	U	U		1	0.258	U	U		1	0.2	U	U		1	0.266	U	U						1		
p-Nitrotoluene	µg/L	0.26	U	UJL	07A	1	0.26	U	UJL	07A	1	0.26	U	U		1	0.258	U	U		1	0.2	U	U		1	0.266	U	U						1		
RDX	µg/L	0.26	U	UJL	07A	1	0.494	J	JL	07A, 15	1	0.26	U	U		1	0.258	U	U		1	0.2	U	U		1	0.266	U	U						1		
Tetryl	µg/L	0.26	U	UJL	07A	1	0.26	U	UJL	07A	1	0.26	U	U		1	0.258	U	U		1	0.2	U	U		1	0.266	U	U						1		

Notes can be found on last page of this table

Table A-4
Water Sampling Results
2004 Investigation/2005 Investigation
LHAAP-29

Sample Location		29WL40-MH09						29WL40-MH09						29WL41-MH10						29WL42-MH11						29WL43-MH12					
Sample ID		29WL40-MH09-02-FD						29WL40-MH09-FD						29WL41-MH10-02						29WL42-MH11-02						29WL43-MH12-02					
Sample Date		23-Feb-05						17-Dec-04						23-Feb-05						23-Feb-05						23-Feb-05					
Sample Depth		-						-						-						-						-					
Sample Type		FD						FD						REG						REG						REG					
Parameter	Units	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF	Result	Qual	ValQual	RC	DF
Explosives																															
1,3,5-Trinitrobenzene	µg/L	0.258	U	U		1	0.2	U	U		1	0.258	U	U		1	0.258	U	U		1	0.275	U	U		1	0.275	U	U		1
1,3-Dinitrobenzene	µg/L	0.258	U	U		1	0.2	U	U		1	0.258	U	U		1	0.258	U	U		1	0.275	U	U		1	0.275	U	U		1
2,4,6-Trinitrotoluene	µg/L	24				5	5900				500	15				4	18				5	25				5	25				5
2,4-Dinitrotoluene	µg/L	1.09				1	0.83	J	J	15	1	1.05				1	0.922	J	J	15	1	0.934	J	J	15	1	0.934	J	J	15	1
2,6-Dinitrotoluene	µg/L	1.24				1	27				20	1.35				1	1.15				1	1.31				1	1.31				1
2-Amino-4,6-dinitrotoluene	µg/L	1.63				1	210				20	2.01				1	1.29				1	1.75				1	1.75				1
4-Amino-2,6-dinitrotoluene	µg/L	2.36				1	280				20	2.58				1	1.96				1	2.67				1	2.67				1
HMX	µg/L	0.258	U	U		1	0.2	U	U		1	0.258	U	U		1	0.258	U	U		1	0.275	U	U		1	0.275	U	U		1
m-Nitrotoluene	µg/L	0.258	U	U		1	0.2	U	U		1	0.258	U	U		1	0.258	U	U		1	0.275	U	U		1	0.275	U	U		1
Nitrobenzene	µg/L	0.258	U	U		1	0.2	U	U		1	0.258	U	U		1	0.258	U	U		1	0.275	U	U		1	0.275	U	U		1
o-Nitrotoluene	µg/L	0.258	U	U		1	0.2	U	U		1	0.258	U	U		1	0.258	U	U		1	0.275	U	U		1	0.275	U	U		1
p-Nitrotoluene	µg/L	0.258	U	U		1	0.2	U	U		1	0.258	U	U		1	0.258	U	U		1	0.275	U	U		1	0.275	U	U		1
RDX	µg/L	0.258	U	U		1	0.2	U	U		1	0.258	U	U		1	0.258	U	U		1	0.275	U	U		1	0.275	U	U		1
Tetryl	µg/L	0.258	U	U		1	0.2	U	U		1	0.258	U	U		1	0.258	U	U		1	0.275	U	U		1	0.275	U	U		1

Notes:

µg/L - micrograms per liter

DF - dilution factor

FD - field duplicate

J - The analyte was positively identified; the reported value is the estimated concentration of the constituent detected in the sample analyzed.

L - Result may be biased low. Details are provided in the validation report.

Qual - qualifier

RC - reason code

07A - sample

15 - quantitation

REG - regular

U - Not detected. The analyte was analyzed for, but not detected above the associated reporting limit.

ValQual - validation qualifier

Table A-5
Explosives Analytes at Wash House 806-D Foundation^a
2005 Sampling by USACE
LHAAP-29

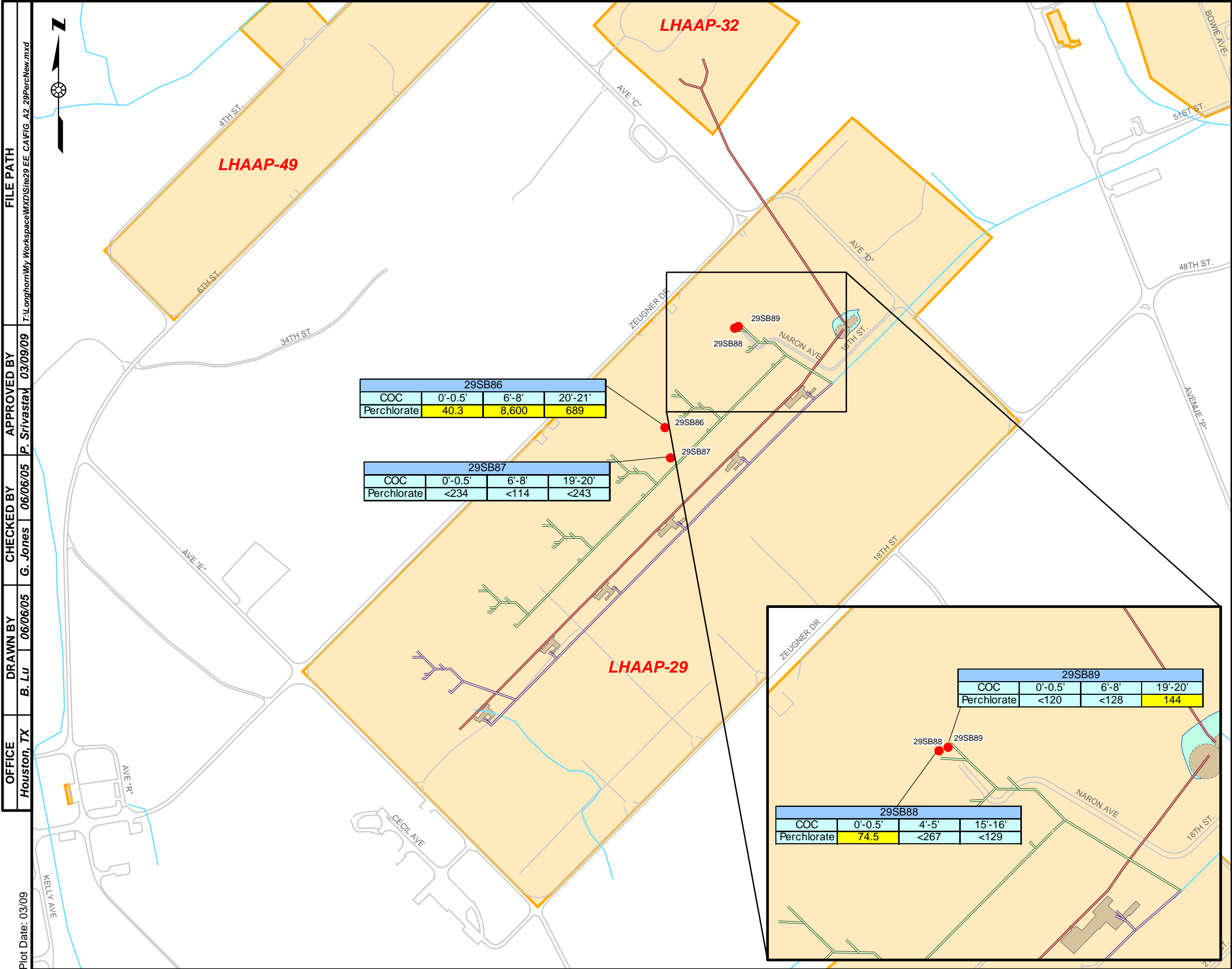
Analyte	2005 Sampling by USACE Explosives Results (µg/kg)		
	29DLineWHC01	29DLineWHC02	29DLineWHW01
1,3,5-Trinitrobenzene	< 375	< 375	4,610
2,4,6-Trinitrotoluene	< 375	< 375	27,300
2,4-Dinitrotoluene	< 375	< 375	< 375
2,6-Dinitrotoluene	< 375	< 375	< 375
2-Amino-4,6-dinitrotoluene	< 375	< 375	5,780
4-Amino-2,6-dinitrotoluene	< 375	< 375	2,870
HMX	< 375	< 375	< 375
m-Dinitrobenzene	< 375	< 375	< 375
m-Nitrotoluene	< 375	< 375	< 375
Nitrobenzene	< 375	< 375	< 375
o-Nitrotoluene	< 375	< 375	< 375
p-Nitrotoluene	< 375	< 375	< 375
RDX	< 375	< 375	< 375
Tetryl	< 375	< 375	< 375

Notes:

^a Reference: USACE, 2005, Personal Communication (e-mail from C. Murray to R. Zeiler), Subject: Wash house soil sampling, March 28.

µg/kg micrograms per kilogram

Figures



00091293

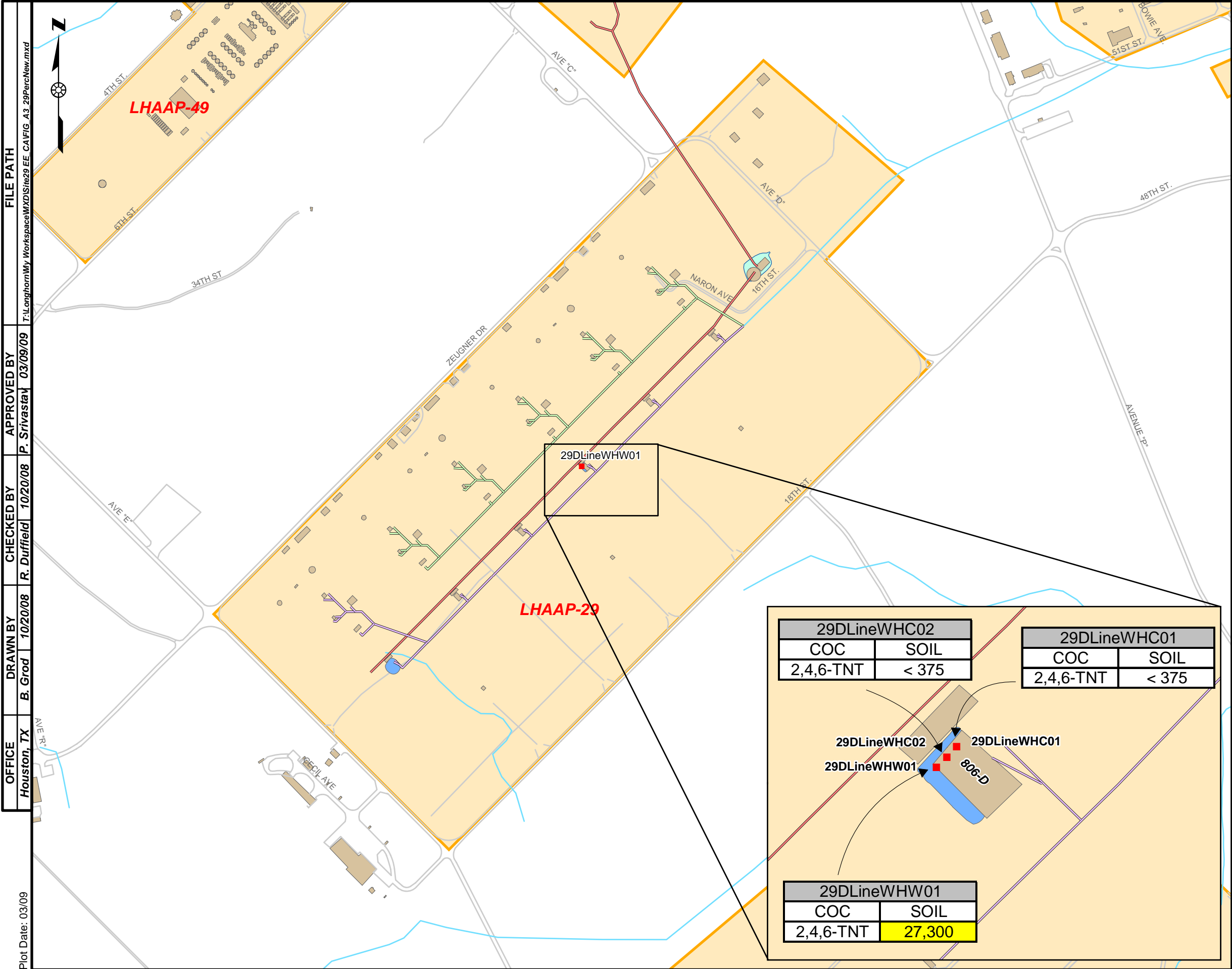


U.S. ARMY CORPS OF ENGINEERS
TULSA DISTRICT
TULSA, OKLAHOMA

FIGURE A-2

SAMPLE LOCATIONS AND RESULTS FOR
PERCHLORATE, DECEMBER 2004
LHAAP-29

LONGHORN ARMY AMMUNITION PLANT
KARNACK, TEXAS



Attachment 1
Laboratory Reports

Available on the Attached CD

TABLE OF CONTENTS

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
SDG: 04L128

SECTION		PAGE
Cover Letter, COC/Sample Receipt Form		1000 – 1006
GC/MS-VOA	**	2000 –
GC/MS-SVOA	**	3000 –
GC-VOA	**	4000 –
GC-SVOA	**	5000 –
HPLC	EPA METHOD 8330	6000 – 6049
METALS	**	7000 –
WET	**	8000 –
OTHERS	**	9000 –

** - Not Requested

EMAX
LABORATORIES, INC.
1835 W. 205th Street
Torrance, CA 90501
Tel: (310) 618-8889
Fax: (310) 618-0818

00091297

Date: 01-03-2005
EMAX Batch No.: 04L128

Attn: Diane Meyer

Shaw E&I
1430 Enclave Parkway
Houston TX 77077

Subject: Laboratory Report
Project: Longhorn Army Ammunition Plant

Enclosed is the Laboratory report for samples received on
12/16/04. The data reported include :

Sample ID	Control #	Col Date	Matrix	Analysis
29SB85-001	L128-01	12/15/04	SOIL	NITROAROMATICS & NITRAMINES
29SB85-002	L128-02	12/15/04	SOIL	NITROAROMATICS & NITRAMINES
29SB85-001-QC	L128-03	12/15/04	SOIL	NITROAROMATICS & NITRAMINES
29SB85-002-QC	L128-04	12/15/04	SOIL	NITROAROMATICS & NITRAMINES
29SB82-001	L128-05	12/15/04	SOIL	NITROAROMATICS & NITRAMINES
29SB82-002	L128-06	12/15/04	SOIL	NITROAROMATICS & NITRAMINES
29SB83-001	L128-07	12/15/04	SOIL	NITROAROMATICS & NITRAMINES
29SB83-002	L128-08	12/15/04	SOIL	NITROAROMATICS & NITRAMINES
29SB84-001	L128-09	12/15/04	SOIL	NITROAROMATICS & NITRAMINES
29SB84-002	L128-10	12/15/04	SOIL	NITROAROMATICS & NITRAMINES
29WL32-MH01	L128-11	12/15/04	WATER	NITROAROMATICS & NITRAMINES
29WL32-MH02	L128-12	12/15/04	WATER	NITROAROMATICS & NITRAMINES

The results are summarized on the following pages.

Please feel free to call if you have any questions concerning
these results.

Sincerely yours,

Kam Y. Pang, Ph.D.
Laboratory Director

1000

00091298



Shaw Environmental & Infrastructure, Inc.

1430 Enclave Parkway
Houston, TX 77077 (281) 368-4000
Tulsa TERC DACA56-94-D-0020

CHAIN-OF-CUSTODY

No. 29-EMAX-DEC04-002

04L128

Laboratory Name: EMAX		Address: 1835 205th Street Torrance, CA 90501		Contact: Joe Kelly											
Project Name Longhorn AAP		Project Location Area 29 Former TNT Production Area		Analysis and Method Desired (Indicate separate containers)											
Project No. 845714		Project Contact Diane Meyer		Project Telephone No. 281-368-4404											
USACE Point of contact: Cliff Murray		Project Manager/Supervisor Praveen Srivastav		Remarks											
USACE Telephone No.															
Item No.	Sample Number	Date	Time	Comp	Grab	Matrix	Sample Description, Location	Number of Containers	Nitroaromatics and Nitroamines by 8330	Perchlorate by 314.0					
1	29SB85-001	12/15/04	10:15			SOIL	29SB85	1	X						
2	29SB85-002		10:22			SOIL	29SB85	1	X						
3	29SB 85 -001-QC		10:15			SOIL	29SB85	1	X						
4	29SB 85 -002-QC		10:22			SOIL	29SB85	1	X						
5															
6															
7															
8															
9															
10															
Transfers Relinquished By (Signature)		Date/Time		Transfers Accepted By (Signature)		Date/Time		Special Instructions							
<i>M. Allen</i>								/							
								FedEx Airbill No.:							
				Laboratory		12-16-04 0930		Sampler's Signature							
TAT: _____ Standard _____ Rush Due: _____		Seals Intact? <input checked="" type="checkbox"/> Y <input type="checkbox"/> N		Received Good Condition <input checked="" type="checkbox"/> Y <input type="checkbox"/> N		Cold 3.0°C									

White - Lab Copy Canary - Field Copy Pink - File Copy

008/010

p. 8

Received Fax: HP LASERJET 3330

Dec. 14, 2004 12:34AM

SHAW EI INC

12/13/2004 14:39 FAX 8656934944

1001

00091300



Shaw Environmental & Infrastructure, Inc.

1430 Enclave Parkway
Houston, TX 77077 (281) 368-4000
Tulsa TERC DACA56-94-D-0020

CHAIN-OF-CUSTODY

No. 29-EMAX-DEC04-008

04L128

Laboratory Name: EMAX		Address: 1835 205th Street Torrance, CA 90501		Contact:														
Project Name Longhorn AAP		Project Location Area 29 Former INT Production Area		Analysis and Method Desired (Indicate separate containers)														
Project No. 845714		Project Contact Diane Meyer		Project Telephone No. 281-368-4404														
USACE Point of contact: Cliff Murray		Project Manager/Supervisor Praveen Srivastav																
USACE Telephone No.																		
Item No.	Sample Number	Date	Time	Comp	Grab	Matrix	Sample Description, Location	Number of Containers	Nitroaromatics and Nitroamines by 8330	Perchlorate by 314.0							Remarks	
1	29WL32-MH01	12/15/04	1530		X	SW	29WL32-MH01	2	X									
2	29WL33-MH02	12/15/04	1445		X	SW	29WL33-MH02	2	X									
3	29WL34-MH03					SW	29WL34-MH03	2	X									
4	29WL35-MH04					SW	29WL35-MH04	2	X									
5	29WL36-MH05					SW	29WL36-MH05	2	X									
6	29WL37-MH06					SW	29WL37-MH06	2	X									
7	29WL38-MH07					SW	29WL38-MH07	2	X									
8	29WL39-MH08					SW	29WL39-MH08	2	X									
9																		
10																		
Transfers Relinquished By (Signature)		Date/Time		Transfers Accepted By (Signature)		Date/Time		Special Instructions										
<i>[Signature]</i>		12/15/04 1600																
								FedEx Airbill No.:										
								Sampler's Signature										
								12-16-04 0930										

TAT: ___ Standard ___ Rush Due: ___

Seals Intact? ☒ Y ☐ N

Received Good Condition ___ Y ___ N ___ Cold

White - Lab Copy Canary - Field Copy Pink - File Copy

1003

12/13/2004 14:38 FAX 000091300

SAMPLE RECEIPT FORM 1

00091301

Type of Delivery	Delivered By/Airbill	ECN	042128
<input type="checkbox"/> EMAX Courier		Receipient	Jon Luna/serg
<input type="checkbox"/> Client Delivery		Date	12-16-04
<input checked="" type="checkbox"/> Third Party <i>UPS</i>	<i>J17B 746 4218</i>	Time	0930

COC Inspection		
<input checked="" type="checkbox"/> Client Name	<input checked="" type="checkbox"/> Sampler Name	<input checked="" type="checkbox"/> Sampling Date/Time/Location
<input checked="" type="checkbox"/> Address	<input type="checkbox"/> Courier Signature/Date/Time	<input type="checkbox"/> Analysis Required
<input checked="" type="checkbox"/> Client PM/FC	<input type="checkbox"/> TAT	<input checked="" type="checkbox"/> Matrix
<input checked="" type="checkbox"/> Tel #/Fax #	<input checked="" type="checkbox"/> Sample ID	<input type="checkbox"/> Preservative (if any)
Safety Issues <input type="checkbox"/> None	<input type="checkbox"/> High Concentrations expected	<input type="checkbox"/> Superfund Site Samples
Comments: <input type="checkbox"/> Rad Screening Required		

Packaging Inspection			
Container	<input checked="" type="checkbox"/> Cooler	<input type="checkbox"/> Box	<input type="checkbox"/>
Condition	<input type="checkbox"/> Custody Seal	<input type="checkbox"/> Intact	<input type="checkbox"/> Damaged
Packaging	<input checked="" type="checkbox"/> Bubble Pack	<input type="checkbox"/> Styrofoam	<input checked="" type="checkbox"/> Sufficient
Temperatures	<input checked="" type="checkbox"/> Cooler 1 <i>3.0°C</i>	<input checked="" type="checkbox"/> Cooler 2	<input checked="" type="checkbox"/> Cooler 3
	<input type="checkbox"/> Cooler 5	<input type="checkbox"/> Cooler 6	<input type="checkbox"/> Cooler 4
	<input type="checkbox"/> Cooler 9	<input type="checkbox"/> Cooler 10	<input type="checkbox"/> Cooler 8
			<input type="checkbox"/> Cooler 12
Comments:			<i>plastic bag</i>

LSCID	Client ID	Discrepancy	Corrective Action
L128-03	295B(05)-001-0C	LABEL READS FOR PERCHLORATE ANALYSIS	called client
			IDS with 80, 81, 82
-04	295B(05)-002-0C	LABEL ID READS 295B050C (DATE/TIME WERE MATCHED ON COC) READS FOR PERCHLORATE ANALYSIS	83, 84 85 → explosives 86, 87, 88, 89 → perchlorate
-05		NO COLLECTION DATE ON LABEL	run these samples for explosives per client
-06		COLLECTION TIME ON LABEL READS 1445 (1448 ON COC)	date to chain of custody
-09		COLLECTION TIME ON LABEL READS 1124 (1125 ON COC)	

LSCID: Lab Sample Container ID

REVIEWS

Sample Labeling

Date

12-16-04

SRF

Date

*PL**12-17-04*

PM

Date

*omk**12/17/04*

1004

00091302

UPS Next Day Air[®]
UPS Worldwide ExpressSM
 Shipping Document

04L128 }
 04L129 } 12-16-04
 0981

SHIPMENT FROM
 UPS ACCOUNT NO. 664 703
 REFERENCE NUMBER

TELEPHONE

Address: 1000 1st St
 Louisville, KY 40202
 Attention: Mr. J. B. Smith
 Phone: 502-581-1234

DELIVERY TO
 TELEPHONE

Address: 1000 1st St
 Louisville, KY 40202
 Attention: Mr. J. B. Smith
 Phone: 502-581-1234

Residential

☐

United Parcel Service, Louisville, KY

WEIGHT	59	DIMENSIONAL WEIGHT	
--------	----	--------------------	--

The shipper authorizes UPS to act as forwarding agent for export control and customs purposes. The shipper certifies that these commodities, technology or software were exported from the United States in accordance with the Export Administration Regulations. Diversion contrary to U.S. law is prohibited.

☐ EXPRESS (INTL)

☐ DOCUMENTS ONLY

1

SATURDAY DELIVERY

J178 746 421 8

J178 746 421 8

EXPORT

UPS Next Day Air[®]
 EXTREMELY URGENT

J178 746 421 8

J178 746 421 8

TRACKING NUMBER

DATE OF SHIPMENT

12-16-04

1

DELIVERY

01019120500W

1005

REPORTING CONVENTIONS**DATA QUALIFIERS:**

Lab Qualifier	AFCEE Qualifier	Description
J	F	Indicates that the analyte is positively identified and the result is less than RL but greater than MDL.
N		Indicates presumptive evidence of a compound.
B	B	Indicates that the analyte is found in the associated method blank as well as in the sample at above QC level.
E	J	Indicates that the result is above the maximum calibration range.
*	*	Out of QC limit.

Note: The above qualifiers are used to flag the results unless the project requires a different set of qualification criteria.

ACRONYMS AND ABBREVIATIONS:

CRDL	Contract Required Detection Limit
RL	Reporting Limit
MRL	Method Reporting Limit
PQL	Practical Quantitation Limit
MDL	Method Detection Limit
DO	Diluted out

DATES

The date and time information for leaching and preparation reflect the beginning date and time of the procedure unless the method, protocol, or project specifically requires otherwise.

00091304

LABORATORY REPORT FOR

SHAW E&I

LONG HORN ARMY AMMUNITION PLANT

EPA METHOD 8330
EXPLOSIVES

SDG#: 04L128

6000

CASE NARRATIVE

CLIENT: SHAW E & I
PROJECT: LONG HORN ARMY AMMUNITION PLANT
EMAX SDG: 04L128

**EPA METHOD 8330
EXPLOSIVES**

Two (2) water and ten (10) soil samples were received on 12/16/04 for Explosives analysis by EPA Method 8330 in accordance with USEPA-SW846 3rd edition, and EMAX-8330.

1. Holding Time

Analytical holding time was met. Extraction for water samples was started and completed on 12/20/04. Extraction for soil samples was started on 12/20/04 and completed on 12/21/04.

2. Calibration

Initial calibration was 5 point. %RSDs were within 20%. All continuing calibrations of the primary column were carried out at 12-hour intervals and the recoveries were within 85-115%.

3. Method Blank

Method blanks were free of contamination at the Reporting Limit.

4. Surrogate recovery

Surrogate recovery for sample L128-11I was diluted out. All other surrogate recoveries were within QC limits.

5. Lab Control Sample / Lab Control Duplicate

All recoveries were within QC limits.

6. Matrix Spike/Matrix Spike Duplicate

Sample L128-02 was spiked. Recoveries were within QC limits.

7. Sample Analysis

Sample analyses were within QC requirements. Quantitation is from the primary column. All positive results above RL were confirmed by LC-CN column and the confirmation is presumptive because it was based on retention time window.

Samples were air-dried prior to extraction; hence, no moisture correction was applied to RL, MDL and results.

LAB CHRONICLE
EXPLOSIVES

00091306

Client : SHAW E&I
Project : LONGHORN ARMY AMMUNITION PLANT

SDG NO. : 04L128
Instrument ID : T081

SOIL									
Client Sample ID	Laboratory Sample ID	Dilution Factor	% Moist	Analysis DateTime	Extraction DateTime	Sample Data FN	Calibration Data FN	Prep. Batch	Notes
MBLK1S	EXL005SB	1	NA	12/21/0417:34	12/20/0417:30	XL21013A	XL21012A	EXL005S	Method Blank
LCS1S	EXL005SL	1	NA	12/21/0418:03	12/20/0417:30	XL21014A	XL21012A	EXL005S	Lab Control Sample (LCS)
29SB85-001	L128-01	1	NA	12/21/0418:32	12/20/0417:30	XL21015A	XL21012A	EXL005S	Field Sample
29SB85-002	L128-02	1	NA	12/21/0419:01	12/20/0417:30	XL21016A	XL21012A	EXL005S	Field Sample
29SB85-002MS	L128-02M	1	NA	12/21/0419:29	12/20/0417:30	XL21017A	XL21012A	EXL005S	Matrix Spike Sample (MS)
29SB85-002MSD	L128-02S	1	NA	12/21/0419:58	12/20/0417:30	XL21018A	XL21012A	EXL005S	MS Duplicate (MSD)
29SB85-001-QC	L128-03	1	NA	12/21/0420:27	12/20/0417:30	XL21019A	XL21012A	EXL005S	Field Sample
29SB85-002-QC	L128-04	1	NA	12/21/0421:54	12/20/0417:30	XL21022A	XL21021A	EXL005S	Field Sample
29SB82-001	L128-05	1	NA	12/21/0422:22	12/20/0417:30	XL21023A	XL21021A	EXL005S	Field Sample
29SB82-002	L128-06	1	NA	12/21/0422:51	12/20/0417:30	XL21024A	XL21021A	EXL005S	Field Sample
29SB83-001	L128-07	1	NA	12/21/0423:20	12/20/0417:30	XL21025A	XL21021A	EXL005S	Field Sample
29SB83-002	L128-08	1	NA	12/21/0423:49	12/20/0417:30	XL21026A	XL21021A	EXL005S	Field Sample
29SB84-001	L128-09	1	NA	12/22/0400:18	12/20/0417:30	XL21027A	XL21021A	EXL005S	Field Sample
29SB84-002	L128-10	1	NA	12/22/0400:46	12/20/0417:30	XL21028A	XL21021A	EXL005S	Field Sample

WATER									
Client Sample ID	Laboratory Sample ID	Dilution Factor	% Moist	Analysis DateTime	Extraction DateTime	Sample Data FN	Calibration Data FN	Prep. Batch	Notes
MBLK1W	EXL004WB	1	NA	12/20/0418:27	12/20/0413:00	XL20004A	XL20003A	EXL004W	Method Blank
LCS1W	EXL004WL	1	NA	12/20/0418:56	12/20/0413:00	XL20005A	XL20003A	EXL004W	Lab Control Sample (LCS)
LCD1W	EXL004WC	1	NA	12/20/0419:24	12/20/0413:00	XL20006A	XL20003A	EXL004W	LCS Duplicate
29WL32-MH01	L128-11	1	NA	12/20/0419:53	12/20/0413:00	XL20007A	XL20003A	EXL004W	Field Sample
29WL32-MH01DL1	L128-11T	5	NA	12/21/0413:15	12/20/0413:00	XL21004A	XL21002A	EXL004W	Diluted Sample
29WL32-MH01DL2	L128-11I	50	NA	12/21/0412:46	12/20/0413:00	XL21003A	XL21002A	EXL004W	Diluted Sample
29WL32-MH02	L128-12	1	NA	12/20/0420:22	12/20/0413:00	XL20008A	XL20003A	EXL004W	Field Sample

FN - Filename
% Moist - Percent Moisture

6002

00091307

SAMPLE RESULTS

6003

EPA METHOD 8330
EXPLOSIVES

00091308

```
=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 17:30
Sample ID   : 29SB85-001                   Date Analyzed: 12/21/04 18:32
Lab Samp ID : L128-01                      Dilution Factor: 1
Lab File ID : XL21015A                     Matrix          : SOIL
Ext Btch ID : EXL005S                      % Moisture       : NA
Calib. Ref. : XL21012A                     Instrument ID    : T-081
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	230J	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200
-----	-----	-----	-----
SURROGATE PARAMETERS	% RECOVERY	QC LIMIT	
-----	-----	-----	
3,4-DINITROTOLUENE	101	63-143	

Note: All positive results are confirmed by CN column

6004

EPA METHOD 8330
EXPLOSIVES

00091309

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 17:30
Sample ID: 29SB85-002                     Date Analyzed: 12/21/04 19:01
Lab Samp ID: L128-02                      Dilution Factor: 1
Lab File ID: XL21016A                     Matrix       : SOIL
Ext Btch ID: EXL005S                      % Moisture    : NA
Calib. Ref.: XL21012A                     Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	300J	400	200
2-AM-4,6-DNT	900	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
3,4-DINITROTOLUENE	99	63-143

Note: All positive results are confirmed by CN column

6005

EPA METHOD 8330
EXPLOSIVES

00091310

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 17:30
Sample ID   : 29SB85-001-QC                Date Analyzed: 12/21/04 20:27
Lab Samp ID : L128-03                      Dilution Factor: 1
Lab File ID : XL21019A                     Matrix          : SOIL
Ext Btch ID : EXL005S                      % Moisture       : NA
Calib. Ref. : XL21012A                     Instrument ID    : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	104	63-143

Note: All positive results are confirmed by CN column

6006

EPA METHOD 8330
EXPLOSIVES

00091311

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 17:30
Sample ID   : 29S885-002-QC                Date Analyzed: 12/21/04 21:54
Lab Samp ID : L128-04                      Dilution Factor: 1
Lab File ID : XL21022A                     Matrix       : SOIL
Ext Btch ID : EXL005S                      % Moisture    : NA
Calib. Ref. : XL21021A                     Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	240J	400	200
2-AM-4,6-DNT	830	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200
SURROGATE PARAMETERS	% RECOVERY	QC LIMIT	
-----	-----	-----	
3,4-DINITROTOLUENE	101	63-143	

Note: All positive results are confirmed by CN column

6007

EPA METHOD 8330
EXPLOSIVES

00091312

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 17:30
Sample ID   : 29SB82-001                   Date Analyzed: 12/21/04 22:22
Lab Samp ID : L128-05                      Dilution Factor: 1
Lab File ID : XL21023A                     Matrix       : SOIL
Ext Btch ID : EXL005S                      % Moisture   : NA
Calib. Ref. : XL21021A                    Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200
SURROGATE PARAMETERS	% RECOVERY	QC LIMIT	
-----	-----	-----	
3,4-DINITROTOLUENE	100	63-143	

Note: All positive results are confirmed by CN column

6008

EPA METHOD 8330
EXPLOSIVES

00091313

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 17:30
Sample ID   : 29SB82-002                   Date Analyzed: 12/21/04 22:51
Lab Samp ID : L128-06                      Dilution Factor: 1
Lab File ID : XL21024A                     Matrix       : SOIL
Ext Btch ID : EXL005S                     % Moisture    : NA
Calib. Ref. : XL21021A                     Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	100	63-143

Note: All positive results are confirmed by CN column

6009

EPA METHOD 8330
EXPLOSIVES

00091314

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                        Date Extracted: 12/20/04 17:30
Sample ID: 29SB83-001                      Date Analyzed: 12/21/04 23:20
Lab Samp ID: L128-07                       Dilution Factor: 1
Lab File ID: XL21025A                      Matrix       : SOIL
Ext Btch ID: EXL005S                       % Moisture    : NA
Calib. Ref.: XL21021A                      Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	430	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200
SURROGATE PARAMETERS	% RECOVERY	QC LIMIT	
-----	-----	-----	
3,4-DINITROTOLUENE	102	63-143	

Note: All positive results are confirmed by CN column

6010

EPA METHOD 8330
EXPLOSIVES

00091315

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 17:30
Sample ID: 29SB83-002                     Date Analyzed: 12/21/04 23:49
Lab Samp ID: L128-08                      Dilution Factor: 1
Lab File ID: XL21026A                     Matrix       : SOIL
Ext Btch ID: EXL005S                     % Moisture   : NA
Calib. Ref.: XL21021A                     Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	100	63-143

Note: All positive results are confirmed by CN column

6011

EPA METHOD 8330
EXPLOSIVES

00091316

```
=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 17:30
Sample ID   : 29SB84-001                   Date Analyzed: 12/22/04 00:18
Lab Samp ID : L128-09                      Dilution Factor: 1
Lab File ID : XL21027A                     Matrix          : SOIL
Ext Btch ID : EXL005S                      % Moisture       : NA
Calib. Ref. : XL21021A                     Instrument ID    : T-081
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200
SURROGATE PARAMETERS	% RECOVERY	QC LIMIT	
-----	-----	-----	
3,4-DINITROTOLUENE	101	63-143	

Note: All positive results are confirmed by CN column

6012

EPA METHOD 8330
EXPLOSIVES

00091317

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 17:30
Sample ID: 29SB84-002                     Date Analyzed: 12/22/04 00:46
Lab Samp ID: L128-10                      Dilution Factor: 1
Lab File ID: XL21028A                     Matrix       : SOIL
Ext Btch ID: EXL005S                     % Moisture    : NA
Calib. Ref.: XL21021A                     Instrument ID : T-081
=====

```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	105	63-143

Note: All positive results are confirmed by CN column

6013

EPA METHOD 8330
EXPLOSIVES

00091318

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                        Date Extracted: 12/20/04 13:00
Sample ID   : 29WL32-MH01                  Date Analyzed: 12/20/04 19:53
Lab Samp ID : L128-11                       Dilution Factor: 1
Lab File ID : XL20007A                      Matrix          : WATER
Ext Btch ID : EXL004W                       % Moisture       : NA
Calib. Ref. : XL20003A                      Instrument ID    : T-081
=====
  
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)	MDL (ug/L)
-----	-----	-----	-----
HMX	ND	1	.2
RDX	ND	1	.2
1,3,5-TNB	ND	1	.2
1,3-DNB	ND	1	.2
TETRYL	ND	1	.2
NITROBENZENE	ND	1	.2
2,4,6-TNT	240E	1	.2
4-AM-2,6-DNT	34E	1	.2
2-AM-4,6-DNT	17E	1	.2
2,6-DNT	4.1	1	.2
2,4-DNT	17E	1	.2
2-NITROTOLUENE	ND	1	.2
3-NITROTOLUENE	ND	1	.2
4-NITROTOLUENE	ND	1	.2

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	90	63-143

Note: All positive results are confirmed by CN column

6014

EPA METHOD 8330
EXPLOSIVES

00091319

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 13:00
Sample ID   : 29WL32-MH01DL1              Date Analyzed: 12/21/04 13:15
Lab Samp ID : L128-11T                    Dilution Factor: 5
Lab File ID : XL21004A                   Matrix       : WATER
Ext Btch ID : EXL004W                   % Moisture    : NA
Calib. Ref. : XL21002A                   Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)	MDL (ug/L)
-----	-----	-----	-----
HMX	ND	5	1
RDX	ND	5	1
1,3,5-TNB	ND	5	1
1,3-DNB	ND	5	1
TETRYL	ND	5	1
NITROBENZENE	ND	5	1
2,4,6-TNT	240E	5	1
4-AM-2,6-DNT	33	5	1
2-AM-4,6-DNT	16	5	1
2,6-DNT	2.7J	5	1
2,4-DNT	15	5	1
2-NITROTOLUENE	ND	5	1
3-NITROTOLUENE	ND	5	1
4-NITROTOLUENE	ND	5	1

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	84	63-143

Note: All positive results are confirmed by CN column

6015

EPA METHOD 8330
EXPLOSIVES

00091320

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 13:00
Sample ID   : 29WL32-MH01DL2               Date Analyzed: 12/21/04 12:46
Lab Samp ID : L128-11I                     Dilution Factor: 50
Lab File ID : XL21003A                     Matrix       : WATER
Ext Btch ID : EXL004W                     % Moisture    : NA
Calib. Ref. : XL21002A                     Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)	MDL (ug/L)
-----	-----	-----	-----
HMX	ND	50	10
RDX	ND	50	10
1,3,5-TNB	ND	50	10
1,3-DNB	ND	50	10
TETRYL	ND	50	10
NITROBENZENE	ND	50	10
2,4,6-TNT	250	50	10
4-AM-2,6-DNT	36J	50	10
2-AM-4,6-DNT	17J	50	10
2,6-DNT	ND	50	10
2,4-DNT	15J	50	10
2-NITROTOLUENE	ND	50	10
3-NITROTOLUENE	ND	50	10
4-NITROTOLUENE	ND	50	10

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	DO	63-143

Note: All positive results are confirmed by CN column

DO : Diluted out

6016

EPA METHOD 8330
EXPLOSIVES

00091321

```

=====
Client      : SHAW E&I                      Date Collected: 12/15/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/16/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 13:00
Sample ID   : 29WL32-MH02                  Date Analyzed: 12/20/04 20:22
Lab Samp ID : L128-12                      Dilution Factor: 1
Lab File ID : XL20008A                     Matrix       : WATER
Ext Btch ID : EXL004W                      % Moisture   : NA
Calib. Ref. : XL20003A                     Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)	MDL (ug/L)
-----	-----	-----	-----
HMX	ND	1	.2
RDX	ND	1	.2
1,3,5-TNB	ND	1	.2
1,3-DNB	ND	1	.2
TETRYL	ND	1	.2
NITROBENZENE	ND	1	.2
2,4,6-TNT	.93J	1	.2
4-AM-2,6-DNT	6.1	1	.2
2-AM-4,6-DNT	3.4	1	.2
2,6-DNT	ND	1	.2
2,4-DNT	ND	1	.2
2-NITROTOLUENE	ND	1	.2
3-NITROTOLUENE	ND	1	.2
4-NITROTOLUENE	ND	1	.2

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	95	63-143

Note: All positive results are confirmed by CN column

6017

QC SUMMARIES

EPA METHOD 8330
EXPLOSIVES

00091323

```

=====
Client      : SHAW E&I                      Date Collected: NA
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/20/04
Batch No.   : 04L128                        Date Extracted: 12/20/04 13:00
Sample ID   : MBLK1W                        Date Analyzed: 12/20/04 18:27
Lab Samp ID : EXL004WB                      Dilution Factor: 1
Lab File ID : XL20004A                      Matrix       : WATER
Ext Btch ID : EXL004W                       % Moisture    : NA
Calib. Ref. : XL20003A                      Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)	MDL (ug/L)
-----	-----	-----	-----
HMX	ND	1	.2
RDX	ND	1	.2
1,3,5-TNB	ND	1	.2
1,3-DNB	ND	1	.2
TETRYL	ND	1	.2
NITROBENZENE	ND	1	.2
2,4,6-TNT	ND	1	.2
4-AM-2,6-DNT	ND	1	.2
2-AM-4,6-DNT	ND	1	.2
3,6-DNT	ND	1	.2
2,4-DNT	ND	1	.2
2-NITROTOLUENE	ND	1	.2
3-NITROTOLUENE	ND	1	.2
4-NITROTOLUENE	ND	1	.2

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	100	63-143

Note: All positive results are confirmed by CN column

6019

EMAX QUALITY CONTROL DATA
LCS/LCD ANALYSIS

00091324

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
BATCH NO.: 04L128
METHOD: EPA 8330

MATRIX: WATER
DILUTION FACTOR: 1 1 1
SAMPLE ID: MBLK1W
LAB SAMP ID: EXL004WB EXL004WL EXL004WC
LAB FILE ID: XL20004A XL20005A XL20006A
DATE EXTRACTED: 12/20/0413:00 12/20/0413:00 12/20/0413:00 DATE COLLECTED: NA
DATE ANALYZED: 12/20/0418:27 12/20/0418:56 12/20/0419:24 DATE RECEIVED: 12/20/04
PREP. BATCH: EXL004W EXL004W EXL004W
CALIB. REF: XL20003A XL20003A XL20003A

ACCESSION:

PARAMETER	BLNK RSLT (ug/L)	SPIKE AMT (ug/L)	BS RSLT (ug/L)	BS % REC	SPIKE AMT (ug/L)	BSD RSLT (ug/L)	BSD % REC	RPD (%)	QC LIMIT (%)	MAX RPD (%)
HMX	ND	4	3.84	96	4	3.99	100	4	70-130	30
RDX	ND	4	3.31	83	4	3.19	80	4	60-130	30
1,3,5-TNB	ND	4	4.03	101	4	4.06	101	1	70-130	30
1,3-DNB	ND	4	3.85	96	4	3.86	96	0	70-130	30
Tetryl	ND	4	4.08	102	4	4.1	102	0	50-140	30
Nitrobenzene	ND	4	3.62	90	4	3.64	91	1	60-130	30
2,4,6-TNT	ND	4	4.18	105	4	4.22	105	1	70-140	30
4-AM-2,6-DNT	ND	4	3.92	98	4	3.92	98	0	70-130	30
2-AM-4,6-DNT	ND	4	4.01	100	4	4.04	101	1	70-130	30
2,6-DNT	ND	4	4.03	101	4	4.07	102	1	70-130	30
2,4-DNT	ND	4	4.13	103	4	4.12	103	0	70-130	30
2-Nitrotoluene	ND	4	3.81	95	4	3.81	95	0	70-130	30
3-Nitrotoluene	ND	4	3.99	100	4	4.02	100	1	70-130	30
4-Nitrotoluene	ND	4	4.02	100	4	4.07	102	1	70-130	30

SURROGATE PARAMETER	SPIKE AMT (ug/L)	BS RSLT (ug/L)	BS % REC	SPIKE AMT (ug/L)	BSD RSLT (ug/L)	BSD % REC	QC LIMIT (%)
3,4-Dinitrotoluene	4	4.09	102	4	4.27	107	70-130

6020

EPA METHOD 8330
EXPLOSIVES

00091325

```

=====
Client      : SHAW E&I                      Date Collected: NA
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/20/04
Batch No.   : 04L128                       Date Extracted: 12/20/04 17:30
Sample ID   : MBLK1S                       Date Analyzed: 12/21/04 17:34
Lab Samp ID : EXL005SB                     Dilution Factor: 1
Lab File ID : XL21013A                     Matrix       : SOIL
Ext Btch ID : EXL005S                      % Moisture    : NA
Calib. Ref. : XL21012A                     Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
3,4-DINITROTOLUENE	103	63-143

Note: All positive results are confirmed by CN column

6021

EMAX QUALITY CONTROL DATA
LCS ANALYSIS

00091326

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
BATCH NO.: 04L128
METHOD: EPA 8330

MATRIX: SOIL % MOISTURE: NA
DILUTION FACTOR: 1 1
SAMPLE ID: MBLK1S
LAB SAMP ID: EXL005SB EXL005SL
LAB FILE ID: XL21013A XL21014A
DATE EXTRACTED: 12/20/04 17:30 12/20/04 17:30 DATE COLLECTED: NA
DATE ANALYZED: 12/21/04 17:34 12/21/04 18:03 DATE RECEIVED: 12/20/04
PREP. BATCH: EXL005S EXL005S
CALIB. REF: XL21012A XL21012A

ACCESSION:

PARAMETER	BLNK RSLT (ug/kg)	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	QC LIMIT (%)
-----	-----	-----	-----	-----	-----
HMX	ND	2000	2110	106	70-140
RDX	ND	2000	2100	105	70-140
1,3,5-TNB	ND	2000	2180	109	70-130
1,3-DNB	ND	2000	2180	109	70-130
Tetryl	ND	2000	2080	104	60-140
Nitrobenzene	ND	2000	2190	109	70-130
2,4,6-TNT	ND	2000	2180	109	70-140
4-AM-2,6-DNT	ND	2000	2160	108	70-130
2-AM-4,6-DNT	ND	2000	2170	109	70-130
2,6-DNT	ND	2000	2120	106	70-140
2,4-DNT	ND	2000	2140	107	70-130
2-Nitrotoluene	ND	2000	2000	100	70-130
3-Nitrotoluene	ND	2000	2090	105	70-130
4-Nitrotoluene	ND	2000	2090	105	70-130

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	QC LIMIT (%)
-----	-----	-----	-----	-----
3,4-Dinitrotoluene	2000	2260	113	70-130

6022

EMAX QUALITY CONTROL DATA
MS/MSD ANALYSIS

00091327

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
BATCH NO.: 04L128
METHOD: EPA 8330

MATRIX: SOIL % MOISTURE: NA
DILUTION FACTOR: 1 1 1
SAMPLE ID: 29SB85-002
LAB SAMP ID: L128-02 L128-02M L128-02S
LAB FILE ID: XL21016A XL21017A XL21018A
DATE EXTRACTED: 12/20/0417:30 12/20/0417:30 12/20/0417:30 DATE COLLECTED: 12/15/04
DATE ANALYZED: 12/21/0419:01 12/21/0419:29 12/21/0419:58 DATE RECEIVED: 12/16/04
PREP. BATCH: EXL005S EXL005S EXL005S
CALIB. REF: XL21012A XL21012A XL21012A

ACCESSION:

PARAMETER	SMPL RSLT (ug/kg)	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	RPD (%)	QC LIMIT (%)	MAX RPD (%)
HMX	ND	2000	2250	113	2000	2170	108	4	63-154	50
RDX	ND	2000	1770	88	2000	1760	88	0	63-154	50
1,3,5-TNB	ND	2000	2160	108	2000	2070	104	4	63-143	50
1,3-DNB	ND	2000	2130	107	2000	2130	106	0	63-143	50
Tetryl	ND	2000	2040	102	2000	1960	98	4	54-154	50
Nitrobenzene	ND	2000	2110	105	2000	1980	99	6	63-143	50
2,4,6-TNT	ND	2000	2120	106	2000	2050	102	3	63-154	50
4-AM-2,6-DNT	300J	2000	2400	105	2000	2270	99	6	63-143	50
2-AM-4,6-DNT	900	2000	3130	111	2000	3010	105	4	63-143	50
2,6-DNT	ND	2000	2130	107	2000	2060	103	3	63-154	50
2,4-DNT	ND	2000	2160	108	2000	2130	106	2	63-143	50
2-Nitrotoluene	ND	2000	2000	100	2000	1890	95	5	63-143	50
3-Nitrotoluene	ND	2000	2030	102	2000	1980	99	3	63-143	50
4-Nitrotoluene	ND	2000	2050	102	2000	2040	102	1	63-143	50

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	QC LIMIT (%)
3,4-Dinitrotoluene	2000	2130	106	2000	1950	98	63-143

6023

INITIAL CALIBRATION

INITIAL CALIBRATION
METHOD 8330

00091329

Lab Name : EMAX Inc
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
LFID & Datetime: XJ19016A 10/19/04 19:08
LFID & Datetime: XJ19017A 10/19/04 19:36
LFID & Datetime: XJ19013A 10/19/04 17:41
LFID & Datetime: XJ19014A 10/19/04 18:10
LFID & Datetime: XJ19015A 10/19/04 18:39
CONC UNIT: ppb

COMPOUND	CONC X	CALIBRATION FACTORS (AREA or HEIGHT)/UNIT					MEAN	%RSD
		1.00X	5.00X	10.00X	20.00X	40.00X		
=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	20.00	69.25	67.82	72.36	72.87	71.66	70.79	3.1
RDX	20.00	80.55	89.55	93.32	92.82	91.48	89.54	5.8
1,3,5-TNB	20.00	212.60	206.29	208.40	210.28	208.06	209.13	1.1
1,3-DNB	20.00	284.05	289.17	293.78	291.57	290.36	289.79	1.3
Tetryl	20.00	169.65	165.60	171.93	171.00	171.53	169.94	1.5
Nitrobenzene	20.00	196.75	195.67	202.54	203.55	201.64	200.03	1.8
2,4,6-TNT	20.00	206.40	200.92	203.90	208.44	205.06	204.94	1.4
4-AM-2,6-DNT	20.00	156.75	144.28	146.21	146.58	146.43	148.05	3.3
2-AM-4,6-DNT	20.00	229.95	205.98	210.31	215.07	216.25	215.51	4.2
2,6-DNT	20.00	137.60	131.99	135.36	140.29	135.29	136.11	2.3
2,4-DNT	20.00	276.20	270.64	273.11	277.46	281.68	275.82	1.5
2-Nitrotoluene	20.00	130.40	127.75	127.93	129.28	128.10	128.69	0.9
4-Nitrotoluene	20.00	104.40	103.10	107.11	109.25	110.43	106.86	2.9
3-Nitrotoluene	20.00	132.95	130.43	138.71	137.68	140.89	136.13	3.2
=====	=====	=====	=====	=====	=====	=====	=====	=====
SURROGATE	X	1.00X	5.00X	10.00X	20.00X	40.00X	MEAN	%RSD
=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	20.00	117.40	121.21	124.62	126.61	126.82	123.33	3.2

EX81J19.MET

RA 6025
10/25/04

INITIAL CALIBRATION
METHOD 8330

00091330

Lab Name : EMAX Inc
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
LFID & Datetime: XJ19016A 10/19/04 19:08
LFID & Datetime: XJ19017A 10/19/04 19:36
LFID & Datetime: XJ19013A 10/19/04 17:41
LFID & Datetime: XJ19014A 10/19/04 18:10
LFID & Datetime: XJ19015A 10/19/04 18:39

COMPOUND	RT OF STANDARDS (MIN)					MEAN	RT WINDOW		RTWINDOW
	1.0X	5.0X	10.0X	20.0X	40.0X	RT	FROM	TO	WIDTH
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.300	4.292	4.292	4.292	4.275	4.290	4.240	4.340	0.050
RDX	6.433	6.383	6.367	6.375	6.333	6.378	6.240	6.516	0.138
1,3,5-TNB	8.650	8.617	8.600	8.633	8.575	8.615	8.462	8.768	0.153
1,3-DNB	10.492	10.450	10.417	10.483	10.400	10.448	10.219	10.677	0.229
Tetryl	11.358	11.308	11.250	11.342	11.250	11.302	11.014	11.590	0.288
Nitrobenzene	12.117	12.092	12.042	12.108	12.033	12.078	11.677	12.479	0.401
2,4,6-TNT	13.675	13.642	13.567	13.642	13.575	13.620	13.219	14.021	0.401
4-AM-2,6-DNT	14.433	14.392	14.292	14.383	14.308	14.362	13.857	14.867	0.505
2-AM-4,6-DNT	14.967	14.983	14.867	14.950	14.883	14.930	14.382	15.478	0.548
2,6-DNT	15.817	15.825	15.742	15.800	15.758	15.788	15.325	16.251	0.463
2,4-DNT	16.383	16.425	16.317	16.367	16.350	16.368	15.891	16.845	0.477
2-Nitrotoluene	19.467	19.525	19.442	19.458	19.467	19.472	18.881	20.063	0.591
4-Nitrotoluene	21.192	21.225	21.150	21.175	21.142	21.177	20.520	21.834	0.657
3-Nitrotoluene	22.658	22.717	22.592	22.633	22.600	22.640	21.888	23.392	0.752
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
SURROGATE	1.0X	5.0X	10.0X	20.0X	40.0X	RT	FROM	TO	WIDTH
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.900	12.858	12.792	12.875	12.792	12.843	12.468	13.218	0.375

EX81J19.MET

6026

RA
10/25/04

INITIAL CALIBRATION VERIFICATION
METHOD 8330

00091331

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XJ19018A 10/19/2004 20:05
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.300	4.250	4.350	400.0	70.800	31158	440.13	10		15
RDX	6.400	6.262	6.538	400.0	89.500	38533	430.32	8		15
1,3,5-TNB	8.642	8.489	8.795	400.0	209.100	91920	439.54	10		15
1,3-DNB	10.483	10.254	10.712	400.0	289.800	127403	439.64	10		15
Tetryl	11.342	11.054	11.630	400.0	169.900	71202	418.98	5		15
Nitrobenzene	12.108	11.707	12.509	400.0	200.000	86805	433.96	8		15
2,4,6-TNT	13.625	13.224	14.026	400.0	204.900	88599	432.31	8		15
4-AM-2,6-DNT	14.400	13.895	14.905	400.0	148.100	60914	411.44	3		15
2-AM-4,6-DNT	14.950	14.402	15.498	400.0	215.500	91200	423.18	6		15
2,6-DNT	15.800	15.337	16.263	400.0	136.100	56248	413.27	3		15
2,4-DNT	16.383	15.906	16.860	400.0	275.800	117421	425.72	6		15
2-Nitrotoluene	19.475	18.884	20.066	400.0	128.700	53460	415.40	4		15
4-Nitrotoluene	21.192	20.535	21.849	400.0	106.900	46579	435.89	9		15
3-Nitrotoluene	22.667	21.915	23.419	400.0	136.100	57575	422.93	6		15
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.875	12.500	13.250	400.0	123.300	52174	423.04	6		15

EX81J19.MET

6027
w/ 25104

ANALYSIS RUN LOG FOR HPLC

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0 ☐

Book # A81-02-005

Starting Date: 10/19/04

Time: 16:45 11:27

Ending Date: 10/19/04

Time: 20:05

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number		81
				(W)	(S)				
	XJ19.001	TEST					INITIAL CALIBRATION REFERENCE		
	2						Date	10/19/04	
	3						Method	EX81J19	
	4						Mid Point	XJ19014A (4/5)	
	5						ICAL ID	SH1B-03-40-3 (800ppb)	
	6						ICV ID	SH1B-03-36-2 (10ppm)	
	7						DCC ID		
	8								
	9								
	10	IB81J614							
NA	11	EX81J1901 20				} Not evaluated } RT shifted			
	12	02 100							
	13	03 200				} 8330 Ical (Primary col.)	Solvents ID		
	14	04 400					Acetonitrile		
	15	05 800				Methanol	43206332		
	16	01 20				Water	43189		
	17	02 100				Electronic Data Archival			
	18	EX81J1901 400				Location		Date	
						<input type="checkbox"/> EZC_5_HPLC			
						<input type="checkbox"/>			
						Comments: Samples disposed off 10/20/04			
						Analyzed By: KP.			
						This page is checked during the data review process.			

ANALYTICAL BATCH

NA

EMAX LABORATORIES, INC. 1835 W. 20th St. Torrance, CA 90501

6028

INITIAL CALIBRATION
METHOD 8330

00091333

Lab Name : EMAX Inc
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
LFID & Datetime: PH17007A 08/17/04 16:21
LFID & Datetime: PH17003A 08/17/04 13:35
LFID & Datetime: PH17004A 08/17/04 14:16
LFID & Datetime: PH17005A 08/17/04 14:58
LFID & Datetime: PH17006A 08/17/04 15:39
CONC UNIT: ppb

COMPOUND	CONC X	CALIBRATION FACTORS (AREA or HEIGHT)/UNIT					MEAN	%RSD
		1.00X	5.00X	10.00X	20.00X	40.00X		
=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	20.00	265.05	223.86	243.86	247.42	244.74	244.99	6.0
RDX	20.00	315.15	255.37	260.41	253.93	258.37	268.65	9.7
Nitrobenzene	20.00	359.70	349.71	329.86	323.97	326.71	337.99	4.7
1,3-DNB	20.00	514.05	508.34	520.54	516.70	515.48	515.02	0.9
2-Nitrotoluene	20.00	238.50	278.15	281.94	287.52	281.20	273.46	7.3
4-Nitrotoluene	20.00	287.00	275.75	289.34	288.21	284.04	284.87	1.9
4-AM-2,6-DNT	20.00	276.50	256.61	256.86	264.78	254.15	261.78	3.5
3-Nitrotoluene	20.00	353.75	380.73	345.64	344.94	337.55	352.52	4.8
2-AM-4,6-DNT	20.00	464.60	447.94	400.02	400.57	393.79	421.38	7.7
1,3,5-TNB	20.00	368.85	364.11	349.42	354.06	340.07	355.30	3.2
2,6-DNT	20.00	258.20	256.25	261.51	248.39	253.99	255.67	1.9
2,4-DNT	20.00	433.50	511.11	524.55	509.46	513.54	498.43	7.4
Tetryl	20.00	511.65	504.42	558.66	520.24	525.23	524.04	4.0
2,4,6-TNT	20.00	421.55	507.22	574.38	536.85	548.40	517.68	11.4
-----	-----	-----	-----	-----	-----	-----	-----	-----
SURROGATE	X	1.00X	5.00X	10.00X	20.00X	40.00X	MEAN	%RSD
=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	20.00	288.40	260.85	245.15	244.29	241.54	256.04	7.7

EX17H17C.MET

RS
8/20/04
6029

INITIAL CALIBRATION
METHOD 8330

00091334

Lab Name : EMAX Inc
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
LFID & Datetime: PH17007A 08/17/04 16:21
LFID & Datetime: PH17003A 08/17/04 13:35
LFID & Datetime: PH17004A 08/17/04 14:16
LFID & Datetime: PH17005A 08/17/04 14:58
LFID & Datetime: PH17006A 08/17/04 15:39

COMPOUND	RT OF STANDARDS (MIN)					MEAN	RT WINDOW		RTWINDOW
	1.0X	5.0X	10.0X	20.0X	40.0X	RT	FROM	TO	WIDTH
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.025	6.050	6.042	6.058	6.033	6.042	5.962	6.122	0.080
RDX	7.800	7.817	7.817	7.833	7.792	7.812	7.708	7.916	0.104
Nitrobenzene	10.633	10.675	10.667	10.692	10.633	10.660	10.556	10.764	0.104
1,3-DNB	15.183	15.258	15.258	15.292	15.175	15.233	14.872	15.594	0.361
2-Nitrotoluene	15.725	15.783	15.767	15.817	15.692	15.757	15.497	16.017	0.260
4-Nitrotoluene	16.225	16.342	16.342	16.375	16.258	16.308	16.018	16.598	0.290
4-AM-2,6-DNT	16.950	17.108	17.108	17.150	17.000	17.063	16.500	17.626	0.563
3-Nitrotoluene	17.700	17.800	17.775	17.825	17.700	17.760	17.393	18.127	0.367
2-AM-4,6-DNT	18.925	19.125	19.125	19.175	19.025	19.075	18.317	19.833	0.758
1,3,5-TNB	20.142	20.267	20.267	20.317	20.200	20.239	19.626	20.852	0.613
2,6-DNT	21.517	21.642	21.650	21.683	21.558	21.610	20.886	22.334	0.724
2,4-DNT	22.733	22.825	22.892	22.942	22.800	22.838	22.041	23.635	0.797
Tetryl	31.667	31.808	31.850	31.875	31.617	31.763	30.113	33.413	1.650
2,4,6-TNT	33.233	33.367	33.358	33.375	33.150	33.297	31.954	34.640	1.343
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
SURROGATE	1.0X	5.0X	10.0X	20.0X	40.0X	RT	FROM	TO	WIDTH
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	18.492	18.650	18.600	18.675	18.525	18.588	18.055	19.121	0.533

EX17H17C.MET

RK
8/20/04
6030

DAILY CALIBRATION

CONTINUE CALIBRATION
METHOD 8330

00091336

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL20003A 12/20/2004 17:58
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.292	4.242	4.342	400.0	70.800	28461	402.03	1		15
RDX	6.300	6.162	6.438	400.0	89.500	35641	398.02	-0		15
1,3,5-TNB	8.500	8.347	8.653	400.0	209.100	83199	397.84	-1		15
1,3-DNB	10.250	10.021	10.479	400.0	289.800	115929	400.05	0		15
Tetryl	11.000	10.712	11.288	400.0	169.900	68123	400.86	0		15
Nitrobenzene	11.792	11.391	12.193	400.0	200.000	80732	403.60	1		15
2,4,6-TNT	13.300	12.899	13.701	400.0	204.900	80648	393.51	-2		15
4-AM-2,6-DNT	13.875	13.370	14.380	400.0	148.100	60372	407.78	2		15
2-AM-4,6-DNT	14.408	13.860	14.956	400.0	215.500	86596	401.82	0		15
2,6-DNT	15.358	14.895	15.821	400.0	136.100	55446	407.37	2		15
2,4-DNT	15.908	15.431	16.385	400.0	275.800	111329	403.63	1		15
2-Nitrotoluene	18.875	18.284	19.466	400.0	128.700	51626	401.15	0		15
4-Nitrotoluene	20.425	19.768	21.082	400.0	106.900	45124	422.27	6		15
3-Nitrotoluene	21.842	21.090	22.594	400.0	136.100	57301	420.92	5		15
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.517	12.142	12.892	400.0	123.300	50724	411.28	3		15

6032

CONTINUE CALIBRATION
METHOD 8330

00091337

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL20015A 12/20/2004 23:44
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.333	4.283	4.383	400.0	70.800	29272	413.49	3		15
RDX	6.408	6.270	6.546	400.0	89.500	38105	425.54	6		15
1,3,5-TNB	8.642	8.489	8.795	400.0	209.100	85122	407.03	2		15
1,3-DNB	10.467	10.238	10.696	400.0	289.800	119721	413.14	3		15
Tetryl	11.275	10.987	11.563	400.0	169.900	69968	411.72	3		15
Nitrobenzene	12.042	11.641	12.443	400.0	200.000	82996	414.92	4		15
2,4,6-TNT	13.592	13.191	13.993	400.0	204.900	84236	411.02	3		15
4-AM-2,6-DNT	14.333	13.828	14.838	400.0	148.100	61879	417.96	4		15
2-AM-4,6-DNT	14.875	14.327	15.423	400.0	215.500	87276	404.97	1		15
2,6-DNT	15.750	15.287	16.213	400.0	136.100	57777	424.50	6		15
2,4-DNT	16.325	15.848	16.802	400.0	275.800	113421	411.21	3		15
2-Nitrotoluene	19.358	18.767	19.949	400.0	128.700	52495	407.90	2		15
4-Nitrotoluene	20.983	20.326	21.640	400.0	106.900	46819	438.13	10		15
3-Nitrotoluene	22.450	21.698	23.202	400.0	136.100	57711	423.93	6		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.850	12.475	13.225	400.0	123.300	51463	417.27	4		15

6033

CONTINUE CALIBRATION
METHOD 8330

00091338

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL21002A 12/21/2004 12:17
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.308	4.258	4.358	400.0	70.800	28235	398.84	-0		15
RDX	6.342	6.204	6.480	400.0	89.500	36063	402.74	1		15
1,3,5-TNB	8.550	8.397	8.703	400.0	209.100	82108	392.62	-2		15
1,3-DNB	10.325	10.096	10.554	400.0	289.800	115534	398.69	-0		15
Tetryl	11.108	10.820	11.396	400.0	169.900	67938	399.77	-0		15
Nitrobenzene	11.875	11.474	12.276	400.0	200.000	79947	399.67	-0		15
2,4,6-TNT	13.400	12.999	13.801	400.0	204.900	80421	392.40	-2		15
4-AM-2,6-DNT	14.033	13.528	14.538	400.0	148.100	59823	404.07	1		15
2-AM-4,6-DNT	14.558	14.010	15.106	400.0	215.500	84462	391.91	-2		15
2,6-DNT	15.492	15.029	15.955	400.0	136.100	54767	402.38	1		15
2,4-DNT	16.033	15.556	16.510	400.0	275.800	110265	399.77	-0		15
2-Nitrotoluene	19.008	18.417	19.599	400.0	128.700	51046	396.64	-1		15
4-Nitrotoluene	20.592	19.935	21.249	400.0	106.900	45322	424.12	6		15
3-Nitrotoluene	22.008	21.256	22.760	400.0	136.100	56862	417.70	4		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.633	12.258	13.008	400.0	123.300	49767	403.52	1		15

CONTINUE CALIBRATION
METHOD 8330

00091339

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL21012A 12/21/2004 17:05
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.300	4.250	4.350	400.0	70.800	28637	404.52	1		15
RDX	6.325	6.187	6.463	400.0	89.500	35492	396.36	-1		15
1,3,5-TNB	8.525	8.372	8.678	400.0	209.100	83787	400.65	0		15
1,3-DNB	10.283	10.054	10.512	400.0	289.800	116602	402.37	1		15
Tetryl	11.033	10.745	11.321	400.0	169.900	68756	404.58	1		15
Nitrobenzene	11.833	11.432	12.234	400.0	200.000	81307	406.47	2		15
2,4,6-TNT	13.350	12.949	13.751	400.0	204.900	80995	395.20	-1		15
4-AM-2,6-DNT	13.925	13.420	14.430	400.0	148.100	61989	418.70	5		15
2-AM-4,6-DNT	14.442	13.894	14.990	400.0	215.500	85780	398.03	-0		15
2,6-DNT	15.417	14.954	15.880	400.0	136.100	55335	406.56	2		15
2,4-DNT	15.950	15.473	16.427	400.0	275.800	111179	403.09	1		15
2-Nitrotoluene	18.933	18.342	19.524	400.0	128.700	51488	400.08	0		15
4-Nitrotoluene	20.508	19.851	21.165	400.0	106.900	44634	417.68	4		15
3-Nitrotoluene	21.917	21.165	22.669	400.0	136.100	57110	419.52	5		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.575	12.200	12.950	400.0	123.300	51157	414.79	4		15

6035

CONTINUE CALIBRATION
METHOD 8330

00091340

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL21021A 12/21/2004 21:25
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.333	4.283	4.383	400.0	70.800	29529	417.12	4		15
RDX	6.408	6.270	6.546	400.0	89.500	36651	409.30	2		15
1,3,5-TNB	8.642	8.489	8.795	400.0	209.100	83931	401.34	0		15
1,3-DNB	10.458	10.229	10.687	400.0	289.800	118138	407.67	2		15
Tetryl	11.258	10.970	11.546	400.0	169.900	68631	403.85	1		15
Nitrobenzene	12.033	11.632	12.434	400.0	200.000	81515	407.51	2		15
2,4,6-TNT	13.583	13.182	13.984	400.0	204.900	82418	402.15	1		15
4-AM-2,6-DNT	14.300	13.795	14.805	400.0	148.100	60872	411.15	3		15
2-AM-4,6-DNT	14.850	14.302	15.398	400.0	215.500	85539	396.91	-1		15
2,6-DNT	15.733	15.270	16.196	400.0	136.100	56026	411.63	3		15
2,4-DNT	16.308	15.831	16.785	400.0	275.800	111103	402.81	1		15
2-Nitrotoluene	19.342	18.751	19.933	400.0	128.700	52850	410.66	3		15
4-Nitrotoluene	20.992	20.335	21.649	400.0	106.900	43058	402.94	1		15
3-Nitrotoluene	22.442	21.690	23.194	400.0	136.100	56680	416.36	4		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.833	12.458	13.208	400.0	123.300	50526	409.68	2		15

CONTINUE CALIBRATION
METHOD 8330

00091341

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL21030A 12/22/2004 01:44
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.358	4.308	4.408	400.0	70.800	28761	406.27	2		15
RDX	6.475	6.337	6.613	400.0	89.500	36851	411.54	3		15
1,3,5-TNB	8.717	8.564	8.870	400.0	209.100	85213	407.47	2		15
1,3-DNB	10.583	10.354	10.812	400.0	289.800	118482	408.86	2		15
Tetryl	11.425	11.137	11.713	400.0	169.900	68419	402.60	1		15
Nitrobenzene	12.183	11.782	12.584	400.0	200.000	82651	413.19	3		15
2,4,6-TNT	13.758	13.357	14.159	400.0	204.900	84235	411.01	3		15
4-AM-2,6-DNT	14.583	14.078	15.088	400.0	148.100	60816	410.78	3		15
2-AM-4,6-DNT	15.158	14.610	15.706	400.0	215.500	86030	399.19	-0		15
2,6-DNT	15.992	15.529	16.455	400.0	136.100	57301	421.00	5		15
2,4-DNT	16.567	16.090	17.044	400.0	275.800	111937	405.83	1		15
2-Nitrotoluene	19.650	19.059	20.241	400.0	128.700	51783	402.37	1		15
4-Nitrotoluene	21.333	20.676	21.990	400.0	106.900	44795	419.19	5		15
3-Nitrotoluene	22.808	22.056	23.560	400.0	136.100	55798	409.88	2		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	13.025	12.650	13.400	400.0	123.300	50569	410.02	3		15

CONTINUE CALIBRATION
METHOD 8330

00091342

Lab Name : EMAX
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: PH17005A 08/17/2004 14:58
Conc Cont LFID & Datetime: PL21002A 12/21/2004 14:29
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.125	6.045	6.205	400.0	245.000	97335	397.31	-1		15
RDX	7.933	7.829	8.037	400.0	268.600	100692	374.81	-6		15
Nitrobenzene	10.725	10.621	10.829	400.0	338.000	131155	388.04	-3		15
1,3-DNB	15.442	15.081	15.803	400.0	515.000	191677	372.17	-7		15
2-Nitrotoluene	15.850	15.590	16.110	400.0	273.500	107744	394.00	-2		15
4-Nitrotoluene	16.450	16.160	16.740	400.0	284.900	117212	411.46	3		15
4-AM-2,6-DNT	17.433	16.870	17.996	400.0	261.800	89732	342.78	-14		15
3-Nitrotoluene	17.883	17.516	18.250	400.0	352.500	145090	411.58	3		15
2-AM-4,6-DNT	19.600	18.842	20.358	400.0	421.400	157332	373.37	-7		15
1,3,5-TNB	20.467	19.854	21.080	400.0	355.300	135909	382.52	-4		15
2,6-DNT	21.867	21.143	22.591	400.0	255.700	96515	377.50	-6		15
2,4-DNT	23.225	22.428	24.022	400.0	498.400	200257	401.77	0		15
Tetryl	32.650	31.000	34.300	400.0	524.000	188547	359.79	-10		15
2,4,6-TNT	33.833	32.490	35.176	400.0	517.700	227459	439.38	10		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	18.908	18.375	19.441	400.0	256.000	92885	362.77	-9		15

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CONTINUE CALIBRATION
METHOD 8330

00091343

Lab Name : EMAX
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: PH17005A 08/17/2004 14:58
Conc Cont LFID & Datetime: PL21013A 12/21/2004 22:06
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.200	6.120	6.280	400.0	245.000	97276	397.07	-1		15
RDX	8.042	7.938	8.146	400.0	268.600	100724	374.93	-6		15
Nitrobenzene	10.883	10.779	10.987	400.0	338.000	129845	384.17	-4		15
1,3-DNB	15.733	15.372	16.094	400.0	515.000	200479	389.26	-3		15
2-Nitrotoluene	16.150	15.890	16.410	400.0	273.500	105320	385.14	-4		15
4-Nitrotoluene	16.767	16.477	17.057	400.0	284.900	119340	418.93	5		15
4-AM-2,6-DNT	18.058	17.495	18.621	400.0	261.800	93293	356.38	-11		15
3-Nitrotoluene	18.250	17.883	18.617	400.0	352.500	142248	403.51	1		15
2-AM-4,6-DNT	20.108	19.350	20.866	400.0	421.400	160422	380.70	-5		15
1,3,5-TNB	20.933	20.320	21.546	400.0	355.300	139700	393.19	-2		15
2,6-DNT	22.450	21.726	23.174	400.0	255.700	98773	386.33	-3		15
2,4-DNT	23.783	22.986	24.580	400.0	498.400	207335	415.97	4		15
Tetryl	33.750	32.100	35.400	400.0	524.000	184486	352.04	-12		15
2,4,6-TNT	34.808	33.465	36.151	400.0	517.700	238090	459.92	15		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	19.358	18.825	19.891	400.0	256.000	93389	364.74	-9		15

6039

CONTINUE CALIBRATION
METHOD 8330

00091344

Lab Name : EMAX
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: PH17005A 08/17/2004 14:58
Conc Cont LFID & Datetime: PL23002A 12/23/2004 13:31
CONC UNIT : ppb

COMPOUND	RT	RT WINDOW		TRUE	AVERAGE	RESULT		%D	QL	%D LIMITS
	MINUTES	FROM	TO	CONC	CF	AREA	CONC			
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.150	6.070	6.230	400.0	245.000	96411	393.54	-2		15
RDX	7.975	7.871	8.079	400.0	268.600	99473	370.27	-7		15
Nitrobenzene	10.817	10.713	10.921	400.0	338.000	128532	380.28	-5		15
1,3-DNB	15.583	15.222	15.944	400.0	515.000	188524	366.05	-8		15
2-Nitrotoluene	16.017	15.757	16.277	400.0	273.500	108923	398.31	-0		15
4-Nitrotoluene	16.600	16.310	16.890	400.0	284.900	114247	401.05	0		15
4-AM-2,6-DNT	17.642	17.079	18.205	400.0	261.800	91953	351.26	-12		15
3-Nitrotoluene	18.083	17.716	18.450	400.0	352.500	133535	378.80	-5		15
2-AM-4,6-DNT	19.750	18.992	20.508	400.0	421.400	149389	354.52	-11		15
1,3,5-TNB	20.700	20.087	21.313	400.0	355.300	127994	360.24	-10		15
2,6-DNT	22.158	21.434	22.882	400.0	255.700	88146	344.77	-14		15
2,4-DNT	23.458	22.661	24.255	400.0	498.400	195937	393.11	-2		15
Tetryl	33.050	31.400	34.700	400.0	524.000	186616	356.11	-11		15
2,4,6-TNT	34.250	32.907	35.593	400.0	517.700	227296	439.07	10		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	19.067	18.534	19.600	400.0	256.000	88738	346.57	-13		15

6040

CONTINUE CALIBRATION
METHOD 8330

00091345

Lab Name : EMAX
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: PH17005A 08/17/2004 14:58
Conc Cont LFID & Datetime: PL23010A 12/23/2004 19:14
CONC UNIT : ppb

COMPOUND	RT	RT WINDOW		TRUE	AVERAGE	RESULT		%D	QL	%D LIMITS
	MINUTES	FROM	TO	CONC	CF	AREA	CONC			
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.092	6.012	6.172	400.0	245.000	100956	412.09	3		15
RDX	7.892	7.788	7.996	400.0	268.600	106815	397.60	-1		15
Nitrobenzene	10.725	10.621	10.829	400.0	338.000	137424	406.59	2		15
1,3-DNB	15.433	15.072	15.794	400.0	515.000	190308	369.52	-8		15
2-Nitrotoluene	15.683	15.423	15.943	400.0	273.500	120478	440.57	10		15
4-Nitrotoluene	16.433	16.143	16.723	400.0	284.900	131083	460.16	15		15
4-AM-2,6-DNT	17.467	16.904	18.030	400.0	261.800	89560	342.12	-14		15
3-Nitrotoluene	17.933	17.566	18.300	400.0	352.500	156892	445.05	11		15
2-AM-4,6-DNT	19.500	18.742	20.258	400.0	421.400	186947	443.65	11		15
1,3,5-TNB	20.517	19.904	21.130	400.0	355.300	140781	396.23	-1		15
2,6-DNT	21.958	21.234	22.682	400.0	255.700	100508	393.12	-2		15
2,4-DNT	23.267	22.470	24.064	400.0	498.400	210136	421.59	5		15
Tetryl	32.625	30.975	34.275	400.0	524.000	197217	376.34	-6		15
2,4,6-TNT	33.950	32.607	35.293	400.0	517.700	237840	459.43	15		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	18.925	18.392	19.458	400.0	256.000	77807	303.88	-24	*	15

6041

00091346

ANALYTICAL LOGS

00091347

ANALYSIS RUN LOG FOR HPLC

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0 ☐

Book # A81-02-005

Starting Date: 12/20/04 Time: 17:00 Ending Date: 12/20/04 Time: 23:44

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number		81
				(W)	(S)				
	XP 12/20/04 XE XL20.001	TEST					INITIAL CALIBRATION REFERENCE		
	2	EG812664					Date	10/19/04	
	3	CEX81J19664				800	Method	EXE1J19	
EXL004W	4	EXL004WB	✓	✓			Mid Point	XJ19014A (4/5)	
	5	L					ICAL ID	—	
	6	↓ C					ICV ID	—	
	7	04L128-11				E	DCC ID	SHIC-03-54-2	
	8	↓ 12							
	9	04L142-07				E			
	10	04L145-01	✓	✓		Sat.			
	11	Range							
EXL004W	12	04L145-02	✓	✓		Sat.	Solvents ID		
	13	Range					Acetonitrile	—	
	14	↓					Methanol	43206332	
	15	CEX81J19665				800	Water	44168	
							Electronic Data Archival		
							Location		Date
							<input type="checkbox"/> EZC_5_HPLC		
							<input type="checkbox"/>		
							Comments: samples disposed off 12/21/04		
							Analyzed By: XP		

ANALYTICAL BATCH XL26003A

EMAX LABORATORIES, INC. 1835 W. 20th St. Tempe, CA 95001

6043

This page is checked during the data review process.

ANALYSIS RUN LOG FOR HPLC

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0 ☐

Book # A81-02-005

Starting Date: 12/21/04 Time: 11:48 Ending Date: 12/22/04 Time: 01:44

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number		81
				(W)	(S)				
	XL21.001	IB 81L666					INITIAL CALIBRATION REFERENCE		
	2	CEX81T19666				800	Date	10/19/04	
EXL004W	3	04L128-11I	50	✓			Method	EX81T19	
	4	↓ 11T	5				Mid Point	XJ19014A (4/8)	
	5	04L145-01I	500				ICAL ID	—	
	6	01T	20				ICV ID	—	
	7	02I	500				DCC ID	SHIC-03-54-2	
	8	↓ 02T	20						
	9	04L142-07I	100						
	10	↓ 07T	10	↓					
	11	IB							
	12	CEX81T19667				800			
EXL005S	13	EXL005SB	1		✓		Solvents ID		
	14	↓ L					Acetonitrile	—	
	15	04L128-01					Methanol	43206332	
	16	02					Water	44168	
	17	02M					Electronic Data Archival		
	18	02S					Location		Date
	19	↓ 03	↓		↓		<input type="checkbox"/> EZC_5_HPLC		
	20	IB					<input type="checkbox"/>		
	21	CEX81T19668				800	Comments:	Samples disposed off 12/22/04	
EXL005S	22	04L128-04	1		✓				
	23	05							
	24	06							
	25	07							
	26	08							
	27	09							
	28	↓ 10	↓		↓		Analyzed By:	XP	
	29	Rinse					This page is checked during the data review process.		
	30	CEX81T19669				800			

ANALYTICAL BATCH XL21003A

EMAX LABORATORIES, INC. 1835 W. 30th ST. TUCSON, AZ 85711

6044

ANALYSIS RUN LOG FOR HPLC

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0 ☐

Book # A17-010

Starting Date: 12/21/04 Time: 13:47 Ending Date: 12/21/04 Time: 22:04

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number		17
				S	W				
	PL21.001	IB172694					Initial Calibration		
	2	CEX17H17C694				800.	Date	08/17/04	
EXL004W	3	04L128-11T	5		✓	hump. RR	met.	EX17H17C	
	4	↓ 11T	↓				m.p	PH17005A (4/5)	
	5	↓ 12	1				Standards		
	6	04L145-01T	20				Name	ID	Conc. (µg/L)
	7	01	1				DCC ID	SHIC-03-54-2	XP 12/21/04 80 400
	8	02T	20						
	9	01	1						
	10	04L142-07T	10						
	11	↓ 07	1						
EXL005S	12	04L128-01	1	✓			Solvent ID		
	↓ 13	XP 12/21/04 CEX17H17C695				800	Methanol	43206337	pure
							Water	44168	↓
							Acetonitrile	—	
							Electronic Data Archival		
							Location	Date	
							Comments: samples disposed off 12/22/04		
							Analyzed By: XP		

This page is checked during the data review process.

ANALYSIS RUN LOG FOR HPLC

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0 ☐

Book # A17-010

Starting Date: 12/23/04

Time: 12:49

Ending Date: 12/24/04

Time: 02:51

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number	
				S	W		17	
	P 123001	IB17L700					Initial Calibration	
	002	EX17H17C700				400	Date	08/17/04
EXL005 S/S 12/23/04	003	04L128-03	1	✓			met.	EX17H17C
	004	-04					m.p	PH17003A
	005	-06					Standards	
	006	-07					Name	ID
	007	-10					Conc. (µg/L)	
	008	-02W					DCC ID	SHIC-03 SL-2
	009	-06W						
	010	EX17H17C701						
	011	TEST						
EXL006 S	012	04L145-03	1	✓			Solvent ID	
	013	-09					Methanol	43306332
	014	-05					Water	44168
	015	-07					Acetonitrile	
	016	-08					Electronic Data Archival	
	017	-06T	5				Location	Date
	018	-06	1				EEC-5-HPLC	12/27/04
	019	IB					Comments:	
	020	↓					Bad separation fungus dispersed off 12/27/04	
	021	EX17H17C702						
12/27/04								
Analyzed By: <u>AS</u>								

00091351

EXTRACTION LOGS

EXTRACTION LOG FOR EXPLOSIVES

00091352

SOP: ☒ EMAX-8330 Rev.No.: 3 □Matrix: SOILStart Date: 12/20/04 Time: 17:30End Date: 12/21/04 Time: 11:00Book # EEX-010

Sample Prep ID	Lab Sample ID	Sample Amount (g ml)	Extract Volume (ml)	Notes	Standards	ID	Amount Added (ml)
					Surrogate	SH/B-03-36-1	0.4
					LCS/MS	SH/B-03-36-2	0.4
*01	EXL005-SB	2.00	20				
*02	JV 12/20/04 SL	2.01	20				
*03	04 L128 -SOI	2.03	20		Reagent	Lot# / ID	
*04	-02	2.01	20		Acetonitrile	43080	
*05	-02M	2.02	20		NaCl	-	
*06	-02S	2.03	20		CaCl ₂	SP/B-01-267	
*07	-03	2.01	20		Silica Sand	42289249	
*08	-04	2.00	20				
*09	-05	2.03	20				
*10	-06	2.03	20				
*11	-07	2.02	20		SDG #	Extract Location	
*12	-08	2.02	20				
*13	-09	2.01	20			SE04 # 1	
*14	-10	2.02	20				
*15	04 L142 -01	2.02	20		Comments:		
*16	-02	2.00	20				
*17	-03	2.01	20				
*18	-04	2.03	20				
*19	-05	2.03	20				
*20	-06	2.02	20				
*21							
*22	12/20/04 JV				Prepared By:	JV	
*23					Standard Added By:	JV/YK	
*24					Checked By:	ML 12/21/04	
*25					Extract Received By:	DX 12/21/04	
*26					Disposal Date:		

PREPARATION BATCH: EXL005-S

EMAX LABORATORIES, INC. 1835 W. 20th St. Torrance, CA 90501

6048

EXTRACTION LOG FOR EXPLOSIVES

00091353

Page 54

SOP: ☒ EMAX-8330 Rev.No.: 3 ☐

Matrix: WATER

Start Date: 12/20/04

Time: 13:00

End Date: 12/20/04 Time: 14:15:30

Book # EEX-010

Sample Prep ID	Lab Sample ID	Sample Amount (g ml)	Extract Volume (ml)	Notes	Standards		Amount Added (ml)
					Surrogate	ID	
					LCS/MS		
*01	EXL004-WB	200	4				
*02	↓ - WL	200	4				
*03	↓ - WC	200	4				
*04	04 L128 - 11	200	4		Reagent	Lot# / ID	
*05	↓ - 12	200	4		Acetonitrile	43080	
*06	04 L142 - 07	200	4		NaCl	SW1A-02-1478	
*07	04 L145 - 01	200	4		CaCl ₂	SP1B- 02-12 01-267	
*08	↓ - 02	200	4		Silica Sand	#2289249 JV 12/20/04	
*09							
*10	JV 12/20/04						
*11					SDG #	Extract Location	
*12							
*13						SECH #1	
*14							
*15					Comments:		
*16							
*17							
*18							
*19							
*20							
*21							
*22					Prepared By:	JV	
*23					Standard Added By:	JV/EG	
*24					Checked By:	ML	
*25					Extract Received By:	VP 12/20/04	
*26					Disposal Date:		

PREPARATION BATCH: EXL004-WB

TABLE OF CONTENTS

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
SDG: 04L129

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GC/MS-VOA	**	2000 –
GC/MS-SVOA	**	3000 –
GC-VOA	**	4000 –
GC-SVOA	**	5000 –
HPLC	**	6000 –
METALS	**	7000 –
WET	METHOD 314.0	8000 – 8021
OTHERS	**	9000 –

** - Not Requested



1835 W. 205th Street
Torrance, CA 90501
Tel: (310) 618-8889
Fax: (310) 618-0818

Date: 01-07-2005
EMAX Batch No.: 04L129

Attn: Diane Meyer

Shaw E&I
1430 Enclave Parkway
Houston TX 77077

Subject: Laboratory Report
Project: Longhorn Army Ammunition Plant

Enclosed is the Laboratory report for samples received on
12/16/04. The data reported include :

Sample ID	Control #	Col Date	Matrix	Analysis
29SB86-001	L129-01	12/14/04	SOIL	PERCHLORATE BY IC
29SB86-002	L129-02	12/14/04	SOIL	PERCHLORATE BY IC
29SB86-003	L129-03	12/14/04	SOIL	PERCHLORATE BY IC
29SB87-001	L129-04	12/14/04	SOIL	PERCHLORATE BY IC
29SB87-002	L129-05	12/14/04	SOIL	PERCHLORATE BY IC
29SB87-003	L129-06	12/14/04	SOIL	PERCHLORATE BY IC
29SB88-001	L129-07	12/14/04	SOIL	PERCHLORATE BY IC
29SB88-002	L129-08	12/14/04	SOIL	PERCHLORATE BY IC
29SB88-003	L129-09	12/14/04	SOIL	PERCHLORATE BY IC
29SB89-001	L129-10	12/15/04	SOIL	PERCHLORATE BY IC
29SB89-002	L129-11	12/15/04	SOIL	PERCHLORATE BY IC
29SB89-003	L129-12	12/15/04	SOIL	PERCHLORATE BY IC

The results are summarized on the following pages.

Please feel free to call if you have any questions concerning
these results.

Sincerely yours,

Kam Y. Pang, Ph.D.
Laboratory Director

00091357



Shaw Environmental & Infrastructure, Inc.

1430 Enclave Parkway
Houston, TX 77077 (281) 368-4000
Tulsa TERC DACA56-94-D-0020

CHAIN-OF-CUSTODY

No. 29-EMAX-DEC04-004

04L129

Laboratory Name: EMAX		Address: 1835 205th Street Torrance, CA 90501		Contact: Joe Kelbley	
Project Name Longhorn AAP		Project Location Area 29 Former INI Production Area		Analysis and Method Desired (Indicate separate containers)	
Project No. 845714		Project Contact Diane Meyer		Project Telephone No. 281-368-4404	
USACE Point of contact: Cliff Murray		Project Manager/Supervisor Praveen Srivastav		USACE Telephone No.	
Item No.	Sample Number	Date	Time	Comp	Grab
1	29SB89-001	12/15/04	0856		X
2	29SB89-002	↓	0910		X
3	29SB89-003	↓	0920		X
4	29SB 00 OC				X
5					
6					
7					
8					
9					
10					
Transfers Relinquished By (Signature)		Date/Time		Transfers Accepted By (Signature)	
<i>M. Hill</i>		12/15/04 1100		<i>[Signature]</i>	
				Date/Time	
				12/16/04 0920	
Special Instructions:					
FedEx Airbill No.:					
Laboratory					
Sampler's Signature					
TAT: Standard Rush Due: Seats Intact? Y N Received Good Condition Y N Cold					

White - Lab Copy Canary - Field Copy Pink - File Copy

010/010

P. 10

Fax Station: HP LASERJET 3330

SHAW EI INC

12/13/2004 14:40 FAX 8656934944

2002

00091359

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UPS Worldwide ExpressSM
 Shipping Document

04L128 }
 04L129 } 12-16-04
 0931

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1004

REPORTING CONVENTIONSDATA QUALIFIERS:

Lab Qualifier	AFCEE Qualifier	Description
J	F	Indicates that the analyte is positively identified and the result is less than RL but greater than MDL.
N		Indicates presumptive evidence of a compound.
B	B	Indicates that the analyte is found in the associated method blank as well as in the sample at above QC level.
E	J	Indicates that the result is above the maximum calibration range.
*	*	Out of QC limit.

Note: The above qualifiers are used to flag the results unless the project requires a different set of qualification criteria.

ACRONYMS AND ABBREVIATIONS:

CRDL	Contract Required Detection Limit
RL	Reporting Limit
MRL	Method Reporting Limit
PQL	Practical Quantitation Limit
MDL	Method Detection Limit
DO	Diluted out

DATES

The date and time information for leaching and preparation reflect the beginning date and time of the procedure unless the method, protocol, or project specifically requires otherwise.

00091361

LABORATORY REPORT FOR

SHAW E&I

LONGHORN ARMY AMMUNITION PLANT

METHOD 314.0
PERCHLORATE

SDG#: 04L129

8000

CASE NARRATIVE

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
SDG: 04L129

METHOD 314.0
PERCHLORATE

Twelve (12) soil samples were received on 12/16/04 for Perchlorate analysis by Method 314.0 in accordance with "Method for Determination of Perchlorate by Ion Chromatography", EPA 600/98-118.

1. Holding Time

Analysis met holding time criteria.

2. Method Blank

Method blank was free of contamination at half the Method Reporting Limit.

3. Lab Control Sample

Lab control sample results were within QC limits.

4. Duplicate

Samples L129-01 and -08 were analyzed for Duplicate. % RPD's were within QC limit.

5. Matrix Spike

Sample L129-01 was spiked. % Recovery was within QC limit.

6. Sample Analysis

Samples were analyzed according to the prescribed QC procedures. All criteria were met.

Non-dilution runs of samples L129-04 to 06, and 08 to 11 could not be evaluated due to matrix interference. The samples were reported from dilution runs.

SAMPLE RESULTS

METHOD 314.0
PERCHLORATE

00091364

Client : SHAW E&I
Project : LONGHORN ARMY AMMUNITION PLANT
Batch No. : 04L129

Matrix : SOIL
Instrument ID : T1057

SAMPLE ID	EMAX SAMPLE ID	RESULTS (ug/kg)	DLF	MOIST	RL (ug/kg)	MDL (ug/kg)	Analysis DATETIME	Extraction DATETIME	LFID	CAL REF	PREP BATCH	Collection DATETIME	Received DATETIME
MBLK1S	PCL007SB	ND	1	NA	20	10	12/29/0418:46	12/28/0416:00	JL29-2	JL29-1	PCL007S	NA	12/28/04
LCS1S	PCL007SL	109	1	NA	20	10	12/29/0419:27	12/28/0416:00	JL29-4	JL29-1	PCL007S	NA	12/28/04
LCD1S	PCL007SC	108	1	NA	20	10	12/29/0419:47	12/28/0416:00	JL29-5	JL29-1	PCL007S	NA	12/28/04
29SB86-001	L129-01	40.3	1	16.6	24	12	12/29/0420:07	12/28/0416:00	JL29-6	JL29-1	PCL007S	12/14/04	12/16/04
29SB86-001DUP	L129-01D	39.4	1	16.6	24	12	12/29/0420:27	12/28/0416:00	JL29-7	JL29-1	PCL007S	12/14/04	12/16/04
29SB86-001MS	L129-01M	164	1	16.6	24	12	12/29/0420:47	12/28/0416:00	JL29-8	JL29-1	PCL007S	12/14/04	12/16/04
29SB86-002	L129-02	8600	100	15.7	2370	1190	01/04/0515:52	12/28/0416:00	JA04-6	JA04-1	PCL007S	12/14/04	12/16/04
29SB86-003	L129-03	689	2	20.2	50.1	25.1	01/04/0516:12	12/28/0416:00	JA04-7	JA04-1	PCL007S	12/14/04	12/16/04
29SB87-001	L129-04	ND	10	14.4	234	117	01/04/0520:04	12/28/0416:00	JA04-18	JA04-12	PCL007S	12/14/04	12/16/04
29SB87-002	L129-05	ND	5	12.3	114	57	01/04/0516:53	12/28/0416:00	JA04-9	JA04-1	PCL007S	12/14/04	12/16/04
29SB87-003	L129-06	ND	10	17.7	243	122	01/04/0520:24	12/28/0416:00	JA04-19	JA04-12	PCL007S	12/14/04	12/16/04
29SB88-001	L129-07	74.5	1	10.6	22.4	11.2	01/04/0519:43	12/28/0416:00	JA04-17	JA04-12	PCL007S	12/14/04	12/16/04
29SB88-002	L129-08	ND	10	25.0	267	133	01/04/0520:44	12/28/0416:00	JA04-20	JA04-12	PCL007S	12/14/04	12/16/04
29SB88-002DUP	L129-08D	ND	10	25.0	267	133	01/04/0521:04	12/28/0416:00	JA04-21	JA04-12	PCL007S	12/14/04	12/16/04
29SB88-003	L129-09	ND	5	22.4	129	64.4	01/04/0518:14	12/28/0416:00	JA04-13	JA04-12	PCL007S	12/14/04	12/16/04
29SB89-001	L129-10	ND	5	16.9	120	60.2	01/04/0518:34	12/28/0416:00	JA04-14	JA04-12	PCL007S	12/15/04	12/16/04
29SB89-002	L129-11	ND	5	21.8	128	63.9	01/04/0518:54	12/28/0416:00	JA04-15	JA04-12	PCL007S	12/15/04	12/16/04
29SB89-003	L129-12	144	1	24.5	26.5	13.2	01/04/0519:14	12/28/0416:00	JA04-16	JA04-12	PCL007S	12/15/04	12/16/04

8003

00091365

EMAX QUALITY CONTROL DATA
MS ANALYSIS

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
BATCH NO.: 04L129
METHOD: METHOD 314.0

=====

MATRIX: SOIL % MOISTURE: 16.6
DILUTION FACTOR: 1 1
SAMPLE ID: 29SB86-001
LAB SAMP ID: L129-01 L129-01M
LAB FILE ID: JL29-6 JL29-8
DATE EXTRACTED: 12/28/0416:00 12/28/0416:00 DATE COLLECTED: 12/14/04
DATE ANALYZED: 12/29/0420:07 12/29/0420:47 DATE RECEIVED: 12/16/04
PREP. BATCH: PCL007S PCL007S
CALIB. REF: JL29-1 JL29-1

ACCESSION:

PARAMETER	SMPL RSLT (ug/kg)	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	QC LIMIT (%)
----- Perchlorate	40.3	120	164	103	75-125

00091365

EMAX QUALITY CONTROL DATA
LCS/LCD ANALYSIS

00091366

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
BATCH NO.: 04L129
METHOD: METHOD 314.0

MATRIX: SOIL % MOISTURE: NA
DILUTION FACTOR: 1 1 1
SAMPLE ID: MBLK1S
LAB SAMP ID: PCL007SB PCL007SL PCL007SC
LAB FILE ID: JL29-2 JL29-4 JL29-5
DATE EXTRACTED: 12/28/0416:00 12/28/0416:00 12/28/0416:00 DATE COLLECTED: NA
DATE ANALYZED: 12/29/0418:46 12/29/0419:27 12/29/0419:47 DATE RECEIVED: 12/28/04
PREP. BATCH: PCL007S PCL007S PCL007S
CALIB. REF: JL29-1 JL29-1 JL29-1

ACCESSION:

PARAMETER	BLNK RSLT (ug/kg)	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	SPIKE AMT (ug/kg)	BSD RSLT (ug/kg)	BSD % REC	RPD (%)	QC LIMIT (%)	MAX RPD (%)
Perchlorate	ND	100	109	109	100	108	108	.1	80-120	20

8005

00091367

EMAX QUALITY CONTROL DATA
DUPLICATE SAMPLE ANALYSIS

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
BATCH NO.: 04L129
METHOD: METHOD 314.0

=====

MATRIX: SOIL % MOISTURE: 16.6
DILUTION FACTOR: 1 1
SAMPLE ID: 29SB86-001 29SB86-001DUP
EMAX SAMP ID: L129-01 L129-01D
LAB FILE ID: JL29-6 JL29-7
DATE EXTRACTED: 12/28/0416:00 12/28/0416:00 DATE COLLECTED: 12/14/04
DATE ANALYZED: 12/29/0420:07 12/29/0420:27 DATE RECEIVED: 12/16/04
PREP. BATCH: PCL007S PCL007S
CALIB. REF: JL29-1 JL29-1

ACCESSION:

PARAMETER	SMPL RSLT (ug/kg)	DUPL RSLT (ug/kg)	RPD RSLT %	QC LIMIT (%)
-----	-----	-----	-----	-----
Perchlorate	40.3	39.4	2	20

9008

EMAX QUALITY CONTROL DATA
DUPLICATE SAMPLE ANALYSIS

00091368

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
BATCH NO.: 04L129
METHOD: METHOD 314.0

=====

MATRIX:	SOIL	% MOISTURE:	25.0
DILUTION FACTOR:	10		
SAMPLE ID:	29SB88-002	29SB88-002DUP	
EMAX SAMP ID:	L129-08	L129-08D	
LAB FILE ID:	JA04-20	JA04-21	
DATE EXTRACTED:	12/28/0416:00	12/28/0416:00	DATE COLLECTED: 12/14/04
DATE ANALYZED:	01/04/0520:44	01/04/0521:04	DATE RECEIVED: 12/16/04
PREP. BATCH:	PCL007S	PCL007S	
CALIB. REF:	JA04-12	JA04-12	

ACCESSION:

PARAMETER	SMPL RSLT (ug/kg)	DUPL RSLT (ug/kg)	RPD RSLT %	QC LIMIT (%)
-----	-----	-----	-----	-----
Perchlorate	ND	ND	NA	20

8007

00091369

IC RESULT FORM

LFID\$	LSID\$	DF\$	PERCHLORATE
JL06-1	IB	1	ND
JL06-2	S-0.0	1	ND
JL06-3	S-2.0	1	101%
JL06-4	S-4.0	1	88.7%
JL06-5	S-10.0	1	91.3%
JL06-6	S-25.0	1	91.2%
JL06-7	S-30.0	1	92.8%
JL06-8	ICV	1	103%
JL06-9	ICB	1	ND
JL06-10	IPCS	1	98.2%
JL06-11	PCL003WB	1	ND
JL06-12	MRL	1	108%
JL06-13	PCL003WL	1	10.8
JL06-14	PCL003WC	1	10.7
JL06-15	L023-01	1	ND
JL06-16	L023-02	1	ND
JL06-17	L023-01	2	ND
JL06-18	L023-02	2	ND
JL06-19	K208-02	1	ND
JL06-20	K208-03	1	ND
JL06-21	K208-04	1	ND
JL06-22	CCV1-15	1	104%
JL06-23	K208-05	20	289
JL06-24	K208-06	1	ND
JL06-25	K184-02	1	ND
JL06-26	K184-03	5	80.2
JL06-27	K184-05	10	211
JL06-28	K184-07	20	301
JL06-29	K184-08	20	446
JL06-30	K184-10	20	281
JL06-31	K184-12	1	5.55
JL06-32	CCV2-30	1	107%
JL06-33	PCL004WB	1	ND
JL06-34	PCL004WL	1	10.9
JL06-35	PCL004WC	1	10.8
JL06-36	K167-02	10	145
JL06-37	K167-03	10	245
JL06-38	K167-06	10	278
JL06-39	K167-07	10	138
JL06-40	K167-10	10	176
JL06-41	K167-11	4	29.8
JL06-42	K142-12	2	54.5
JL06-43	CCV3-15	1	103%

8008

00091370

IC SEQUENCE FORM

INDX	LSID	LFID	DF	METNAME	SELCOMP	DateTime
1	IB	JL06-1	1	IC57L06	ALL	12/06/0420:29
2	S-0.0	JL06-2	1	IC57L06	ALL	12/06/0420:50
3	S-2.0	JL06-3	1	IC57L06	ALL	12/06/0421:10
4	S-4.0	JL06-4	1	IC57L06	ALL	12/06/0421:30
5	S-10.0	JL06-5	1	IC57L06	ALL	12/07/0410:04
6	S-25.0	JL06-6	1	IC57L06	ALL	12/07/0410:24
7	S-30.0	JL06-7	1	IC57L06	ALL	12/07/0410:45
8	ICV	JL06-8	1	IC57L06	ALL	12/07/0411:04
9	ICB	JL06-9	1	IC57L06	ALL	12/07/0414:31
10	IPCS	JL06-10	1	IC57L06	ALL	12/07/0414:52
11	PCL003WB	JL06-11	1	IC57L06	ALL	12/07/0415:12
12	MRL	JL06-12	1	IC57L06	ALL	12/07/0415:32
13	PCL003WL	JL06-13	1	IC57L06	ALL	12/07/0415:52
14	PCL003WC	JL06-14	1	IC57L06	ALL	12/07/0416:12
15	L023-01	JL06-15	1	IC57L06	ALL	12/07/0416:32
16	L023-02	JL06-16	1	IC57L06	ALL	12/07/0416:53
17	L023-01	JL06-17	2	IC57L06	ALL	12/07/0417:13
18	L023-02	JL06-18	2	IC57L06	ALL	12/07/0417:33
19	K208-02	JL06-19	1	IC57L06	ALL	12/07/0418:13
20	K208-03	JL06-20	1	IC57L06	ALL	12/07/0418:33
21	K208-04	JL06-21	1	IC57L06	ALL	12/07/0418:53
22	CCV1-15	JL06-22	1	IC57L06	ALL	12/07/0419:13
23	K208-05	JL06-23	20	IC57L06	ALL	12/07/0419:33
24	K208-06	JL06-24	1	IC57L06	ALL	12/07/0419:53
25	K184-02	JL06-25	1	IC57L06	ALL	12/07/0420:13
26	K184-03	JL06-26	5	IC57L06	ALL	12/07/0420:34
27	K184-05	JL06-27	10	IC57L06	ALL	12/07/0420:54
28	K184-07	JL06-28	20	IC57L06	ALL	12/07/0421:14
29	K184-08	JL06-29	20	IC57L06	ALL	12/07/0421:34
30	K184-10	JL06-30	20	IC57L06	ALL	12/07/0421:54
31	K184-12	JL06-31	1	IC57L06	ALL	12/07/0422:14
32	CCV2-30	JL06-32	1	IC57L06	ALL	12/07/0422:34
33	PCL004WB	JL06-33	1	IC57L06	ALL	12/07/0422:55
34	PCL004WL	JL06-34	1	IC57L06	ALL	12/07/0423:15
35	PCL004WC	JL06-35	1	IC57L06	ALL	12/07/0423:35
36	K167-02	JL06-36	10	IC57L06	ALL	12/07/0423:55
37	K167-03	JL06-37	10	IC57L06	ALL	12/08/0400:15
38	K167-06	JL06-38	10	IC57L06	ALL	12/08/0400:35
39	K167-07	JL06-39	10	IC57L06	ALL	12/08/0400:56
40	K167-10	JL06-40	10	IC57L06	ALL	12/08/0401:16
41	K167-11	JL06-41	4	IC57L06	ALL	12/08/0401:36
42	K142-12	JL06-42	2	IC57L06	ALL	12/08/0401:56
43	CCV3-15	JL06-43	1	IC57L06	ALL	12/08/0402:17

8009

00091371

IC RESULT FORM

LFID\$	LSID\$	DF\$	PERCHLORATE
JL29-1	IPCS	1	102%
JL29-2	PCL007SB	1	.411
JL29-3	MRL	1	117%
JL29-4	PCL007SL	1	10.9
JL29-5	PCL007SC	1	10.8
JL29-6	L129-01	1	3.36
JL29-7	L129-01D	1	3.29
JL29-8	L129-01M	1	13.7
JL29-9	L129-02	1	66.9
JL29-10	L129-03	1	62.4
JL29-11	L129-04	1	ND
JL29-12	L129-05	1	ND
JL29-13	CCV7-15	1	95.3%
JL29-14	B	1	ND
JL29-15	L129-06	1	ND
JL29-16	L129-07	1	ND
JL29-17	L129-08	1	ND
JL29-18	L129-09	1	ND
JL29-19	L129-10	1	9.7
JL29-20	L129-11	1	ND
JL29-21	L129-12	1	12.2
JL29-22	CCV8-30	1	42.3%*
JL29-23	L129-02	25	1800
JL29-24	L129-03	2	ND
JL29-25	L129-04	1	ND
JL29-26	L129-05	1	ND
JL29-27	L129-06	1	ND
JL29-28	CCV9-15	1	ND
JL29-29	L129-05	5	ND
JL29-30	L129-06	5	ND
JL29-31	L129-08	5	ND
JL29-32	L129-09	5	ND
JL29-33	L129-10	5	ND
JL29-34	L129-11	5	313
JL29-35	CCV10-30	1	111%*

JL29-1
JL29-2
JL29-3
JL29-4
JL29-5
JL29-6
JL29-7
JL29-8
JL29-9
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JL29-11
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JL29-31
JL29-32
JL29-33
JL29-34
JL29-35

8010

00091372

IC SEQUENCE FORM

INDEX	LSID	LFID	DF	METNAME	SELCOMP	DateTime
1	IPCS	JL29-1	1	IC57L06	ALL	12/29/0418:26
2	PCL007SB	JL29-2	1	IC57L06	ALL	12/29/0418:46
3	MRL	JL29-3	1	IC57L06	ALL	12/29/0419:07
4	PCL007SL	JL29-4	1	IC57L06	ALL	12/29/0419:27
5	PCL007SC	JL29-5	1	IC57L06	ALL	12/29/0419:47
6	L129-01	JL29-6	1	IC57L06	ALL	12/29/0420:07
7	L129-01D	JL29-7	1	IC57L06	ALL	12/29/0420:27
8	L129-01M	JL29-8	1	IC57L06	ALL	12/29/0420:47
9	L129-02	JL29-9	1	IC57L06	ALL	12/29/0421:07
10	L129-03	JL29-10	1	IC57L06	ALL	12/29/0421:28
11	L129-04	JL29-11	1	IC57L06	ALL	12/29/0421:48
12	L129-05	JL29-12	1	IC57L06	ALL	12/29/0422:08
13	CCV7-15	JL29-13	1	IC57L06	ALL	12/29/0422:28
14	B	JL29-14	1	IC57L06		12/29/0422:48
15	L129-06	JL29-15	1	IC57L06	ALL	12/29/0423:08
16	L129-07	JL29-16	1	IC57L06	ALL	12/29/0423:29
17	L129-08	JL29-17	1	IC57L06	ALL	12/29/0423:49
18	L129-09	JL29-18	1	IC57L06	ALL	12/30/0400:09
19	L129-10	JL29-19	1	IC57L06	ALL	12/31/0403:14
20	L129-11	JL29-20	1	IC57L06	ALL	12/31/0403:46
21	L129-12	JL29-21	1	IC57L06	ALL	12/31/0404:18
22	CCV8-30	JL29-22	1	IC57L06	ALL	12/31/0404:51
23	L129-02	JL29-23	25	IC57L06	ALL	12/31/0405:23
24	L129-03	JL29-24	2	IC57L06	ALL	12/31/0405:55
25	L129-04	JL29-25	1	IC57L06	ALL	12/31/0406:27
26	L129-05	JL29-26	1	IC57L06	ALL	12/31/0406:59
27	L129-06	JL29-27	1	IC57L06	ALL	12/31/0407:31
28	CCV9-15	JL29-28	1	IC57L06	ALL	12/31/0408:03
29	L129-05	JL29-29	5	IC57L06	ALL	12/31/0408:36
30	L129-06	JL29-30	5	IC57L06	ALL	12/31/0409:08
31	L129-08	JL29-31	5	IC57L06	ALL	12/31/0409:40
32	L129-09	JL29-32	5	IC57L06	ALL	12/31/0410:12
33	L129-10	JL29-33	5	IC57L06	ALL	12/31/0410:44
34	L129-11	JL29-34	5	IC57L06	ALL	12/31/0411:16
35	CCV10-30	JL29-35	1	IC57L06	ALL	12/31/0411:48

8011

00091373

IC RESULT FORM

LFID\$	LSID\$	DF\$	PERCHLOR
JA04-1	IPCS	1	13.3
JA04-2	PCL007SQ	1	ND
JA04-3	MRL	1	2.21
JA04-4	PCL007SX	1	10.9
JA04-5	PCL007SY	1	10.9
JA04-6	L129-02	100	725
JA04-7	L129-03	2	54.9
JA04-8	L129-04	5	ND
JA04-9	L129-05	5	ND
JA04-10	L129-06	5	ND
JA04-11	L129-08	5	ND
JA04-12	CCV11-15	1	108%
JA04-13	L129-09	5	ND
JA04-14	L129-10	5	ND
JA04-15	L129-11	5	ND
JA04-16	L129-12	1	10.9
JA04-17	L129-07	1	6.66
JA04-18	L129-04	10	ND
JA04-19	L129-06	10	ND
JA04-20	L129-08	10	ND
JA04-21	L129-08D	10	ND
JA04-22	L129-08A	10	116
JA04-23	BL	1	ND
JA04-24	CCV12-30	1	114%
JA04-25	CCV12-30	1	114%

8012

00091374

IC SEQUENCE FORM

INDX	LSID	LFID	DF	METNAME	SELCOMP	DateTime
1	IPCS	JA04-1	1	IC57L06	ALL	01/04/0513:03
2	PCL007SQ	JA04-2	1	IC57L06	ALL	01/04/0514:31
3	MRL	JA04-3	1	IC57L06	ALL	01/04/0514:51
4	PCL007SX	JA04-4	1	IC57L06	ALL	01/04/0515:11
5	PCL007SY	JA04-5	1	IC57L06	ALL	01/04/0515:32
6	L129-02	JA04-6	100	IC57L06	ALL	01/04/0515:52
7	L129-03	JA04-7	2	IC57L06	ALL	01/04/0516:12
8	L129-04	JA04-8	5	IC57L06	ALL	01/04/0516:32
9	L129-05	JA04-9	5	IC57L06	ALL	01/04/0516:53
10	L129-06	JA04-10	5	IC57L06	ALL	01/04/0517:13
11	L129-08	JA04-11	5	IC57L06	ALL	01/04/0517:33
12	CCV11-15	JA04-12	1	IC57L06	ALL	01/04/0517:53
13	L129-09	JA04-13	5	IC57L06	ALL	01/04/0518:14
14	L129-10	JA04-14	5	IC57L06	ALL	01/04/0518:34
15	L129-11	JA04-15	5	IC57L06	ALL	01/04/0518:54
16	L129-12	JA04-16	1	IC57L06	ALL	01/04/0519:14
17	L129-07	JA04-17	1	IC57L06	ALL	01/04/0519:43
18	L129-04	JA04-18	10	IC57L06	ALL	01/04/0520:04
19	L129-06	JA04-19	10	IC57L06	ALL	01/04/0520:24
20	L129-08	JA04-20	10	IC57L06	ALL	01/04/0520:44
21	L129-08D	JA04-21	10	IC57L06	ALL	01/04/0521:04
22	L129-08A	JA04-22	10	IC57L06	ALL	01/04/0521:25
23	BL	JA04-23	1	IC57L06	ALL	01/04/0521:45
24	CCV12-30	JA04-24	1	IC57L06	ALL	01/04/0522:05
25	CCV12-30	JA04-25	1	IC57L06	ALL	01/04/0522:25

8013

ANALYSIS RUN LOG FOR IC - PERCHLORATE

SOP ☒ EMAX-314.0 Revision No. 2 ☐

Book # A57-008

Start Date 12/29/04 Time 1820

Ending Date 12/31/04

Time 1148

Sample Prep ID	Data File Name	Lab Sample ID	DF	Matrix		Conductivity, (us/cm)	Notes	Instrument Number	
				S	W				57
* 1	1129-1	IPC3	1			2660		INITIAL CALIBRATION REFERENCE	
* 2	2	PEL007SB		S				Method File	IC 57 LOG. MET
* 3	3	MRL						ICAL ID	SW8B-02-652
* 4	4	PEL007SL		S				ICV ID	↓ -654
* 5	5	↓ SC							
* 6	6	1129-01				36.1		Standards	
* 7	7	-010				35.8		Name	ID
* 8	8	-014				36.7		ICAL	S1
* 9	9	-02				18.1			S2
* 10	10	-03				26			S3
* 11	11	-04				10.4			S4
* 12	12	-05				33.5			S5
* 13	13	CCV9-15						ICV	
* 14	14	BL						CCV-15	SW8B-02-060
* 15	15	1129-06		S		174.5	* unstable	CCV-30	-661
* 16	16	-07				16.0	baseline	LCS	662
* 17	17	-08				90.1	reanalysis	MS	-651
* 18	18	-09				124.4	samples	IPC	-663
* 19	19	-10				211.3		CMC	SW8B-02-565
* 20	20	-11				13.5		Comments:	
* 1	21	-12				89		CMC Reading, (us/cm)	QC Criteria (us/cm)
* 2	22	CCV8-30	1						Temp. (°C)
* 3	23	1129-02	25	S				1409	±30
* 4	24	-03	2						25
* 5	25	-04	1				**	Electronic Data Archival	
* 6	26	-05						Location	Date
* 7	27	-06						** Peaks detected in Series	
* 8	28	CCV9-15							
* 29	29	1129-05						Analyzed By:	JK/MS
* 30	30	-06						This page is checked during the data review process.	

EMAX LABORATORIES, INC. 1835 W. 20th St. Torrance, CA 90501

BATCH * PEL007 S **

8014

ANALYSIS RUN LOG FOR IC - PERCHLORATE

SOP ☒ EMAX-314.0 Revision No. 2 ☐

Book # A57-008

Start Date		Time		Ending Date		Time	
1/4/05		13:03		1/4/05			
Sample Prep ID	Data File Name	Lab Sample ID	DF	Matrix S	Matrix W	Conductivity, (us/cm)	Notes
* 1	JA04-1	1PCS	1			2680	
* 2	2	PCL07SQ	1	S			
* 3	3	MRL	1				
* 4	4	PCL007SX	1	S			
* 5	5	↓ SY	1				
* 6	6	2129-02	100			Refer to	
* 7	7	-03	2			pp	
* 8	8	-04	5			1.57-008	
* 9	9	-05	1			24	
* 10	10	✓ -06	↓				
* 1	11	-08	5				
* 2	12	CCV11-15	1				
* 3	13	2129-09	✓	S			
* 4	14	-10	↓				
* 5	15	-4	5				
* 6	16	-12	1				
* 7	17	-07	1				
* 8	18	-04	10				
* 19	19	-06	↓				
* 20	20	-08	↓				
* 1	21	-08D	↓				
* 2	22	-08A	10	✓			
* 3	23	pl	1				
* 4	24	CCV12-30	↓				
* 5	25	CCV12-30R	↓				
* 6	26						
* 7	27						
* 8	28						
* 29	29						
* 30	30						

Instrument Number

57

INITIAL CALIBRATION REFERENCE

Method File 1CJ7L00. MET
 ICAL ID SW8B-02-652
 ICV ID ↓ -854

Standards

Name	ID	Conc. (ug/L)
ICAL S1		
S2		
S3		
S4		
S5		
ICV		
CCV-15	SW8B-02-660	15
CCV-30	-661	30
LCS	-662	10
MS/A	-651	10
IPC	SW8B-02-663	300ppm/10ppb
CMC	SW8B-02-568	1413 μmhos

Comments:

CMC Reading, (us/cm)	QC Criteria (us/cm)	Temp. (°C)
1411	±30	25

Electronic Data Archival

Location	Date

Analyzed By: LB1JR

This page is checked during the data review process.

ANALYSIS RUN LOG FOR IC - PERCHLORATE

SOP ☒ EMAX-314.0 Revision No. 2 ☐

Book # A57-008

Start Date

12/29/04

Time

18:20

Ending Date

12/31/04

Time

11:48

Sample Prep ID	Data File Name	Lab Sample ID	DF	Matrix		Conductivity, (us/cm)	Notes	Instrument Number	
				S	W				57
* 31	1629-31	2128-08	5					INITIAL CALIBRATION REFERENCE	
* 2	32	-09						Method File	SAME AS p 2d
* 3	33	-10						ICAL ID	
* 4	34	-11						ICV ID	
* 5	35	CCV10-30							
* 6								Standards	
* 7								Name	ID
* 8								ICAL	S1
* 9									S2
* 0									S3
* 1									S4
* 2									S5
* 3								ICV	
* 4								CCV-15	
* 5								CCV-30	
* 6								LCS	
* 7								MS	
* 8								IPC	
* 9								CMC	
* 0								Comments:	
* 1								CMC Reading, (us/cm)	QC Criteria (us/cm)
* 2									Temp. (°C)
* 3								±30	
* 4								Electronic Data Archival	
* 5								Location	Date
* 6									
* 7									
* 8									
* 9									
* 0									

Analyzed By: *MAB*

This page is checked during the data review process.

ANALYSIS RUN LOG FOR IC - PERCHLORATE

SOP ☒ EMAX-314.0 Revision No. 2 ☐

Book # A57-008

Start Date 10/6/04

Time 12:24

Ending Date

Time

Sample Prep ID	Data File Name	Lab Sample ID	DF	Matrix		Conductivity, (us/cm)	Notes
				S	W		
* 1	JJ06-1	1B	1		X		
* 2	2	S-0.0					
* 3	3	S-2.0					
* 4	4	S-4.0					
* 5	5	S-10.0					
* 6	6	S-25.0					
* 7	7	S-30.0					
* 8	8	ICV					
* 9	9	ICB					
* 0							
* 1							
* 2							
* 3							
* 4							
* 5							
* 6							
* 7							
* 8							
* 9							
* 0							
* 1							
* 2							
* 3							
* 4							
* 5							
* 6							
* 7							
* 8							
* 9							
* 0							

BATCH: 10/6/04

EMAX LABORATORIES, INC. 1805 W. 21st St. Torrance, CA 90501

8017

Instrument Number		57
INITIAL CALIBRATION REFERENCE		
Method File	1C57J06.MET	
ICAL ID	SWBB-02-639	
ICV ID	↓ 640	
Standards		
Name	ID	Conc. (ug/L)
ICAL S1	SWBB-02-639	2
S2	↓	4
S3	↓	10
S4	↓	25
S5	↓	30
ICV	SWBB-02-640	25
CCV-15		
CCV-30		
LCS		
MS		
IPC		
CMC		
Comments:		
CMC Reading, (us/cm)	QC Criteria (us/cm)	Temp. (°C)
	±30	
Electronic Data Archival		
Location		Date
Analyzed By: 2		

This page is checked during the data review process.

EXTRACTION LOGS

00091380

SAMPLE PREPARATION LOG FOR ORGANIC ACID/PERCHLORATE

SOP ☒ EMAX-314.0☐ EMAX-300.0M

Book # EOP-001

Matrix

2012

Start Date 12/28/04

Time

1600

End Date

12/28/04

Time

2000

Sample Prep ID	Lab Sample ID	Sample Amount (g)	Dilution Volume (ml)	Extract Volume (ml)	Notes	Standards	ID	Amount Added (ml)
						Acetate	NA	
						Butyrate		
						Lactate		
*01	PC L007 SB	10	100	100		Perchlorate	SW8B-02-C51	1.0
*02	SL	10				Propionate	NA	
*03	SL	10				Pyruvate		
*04	04 L129 - 01	10.01			Clear extract			
*05	-010	10.02						
*06	-014	10.01						
*07	-02	10.00			Bn / Td	Reagent	Lot # / ID	
*08	-03	10.00				H ₂ SO ₄	NT	
*09	-04	10.00				Nanopure	Nanopure	
*10	-05	10.03				Kce	SW 3B0 2-565, 1413 μ mhos/cm	
*11	-06	10.02						
*12	-07	10.01			Clear	Legend:		
*13	-08	10.01			Bn / Td	Color	Texture	Clarity
*14	-09	10.02			Clear	Bu = Blue	Cs = Coarse	Cr = Clear
*15	-10	10.00			Bn / Td	B1 = Black	Md = Medium	Cy = Cloudy
*16	-11	10.00				Gn = Green	Fn = Fine	Td = turbid
*17	-12	10.00			Clear	Og = Orange		
*18						Rd = Red		
*19						Yw = Yellow		
*20						Comments:		
*21								
*22								
*23								
*24								
*25								

Prepared By: JK / NB

Standard Added By: JK / NB

Checked By:

PREPARATION BATCH * PC L007S

EMAX LABORATORIES, INC. 1835 W. 20TH ST. TORRANCE, CA 90501

8019

RETENTION TIME WINDOW

00091382

**RETENTION TIME WINDOW
PERCHLORATE**

Lab name: EMAX Method: EMAX-314.1
Instrument ID: DX500IC57 IC column: AS16
Column size: 4X250NM

Sample ID	CCV10-30	CCV11-15	MRL	AVERAGE RETENTION TIME	SD	RETENTION TIME WINDOW 3*SD
Analysis Date	1/7/04	1/8/04	1/9/04			
Analysis Time	18:14	18:15	13:01			
COMPOUND	JA06-24	JA08-13	JA09-3			
PERCHLORATE	12.363	12.355	12.278	12.332	0.047	0.141

8021

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CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
SDG: 04L142

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GC/MS-SVOA	**	3000 –
GC-VOA	**	4000 –
GC-SVOA	**	5000 –
HPLC	EPA METHOD 8330	6000 – 6051
METALS	**	7000 –
WET	**	8000 –
OTHERS	**	9000 –

** - Not Requested

EMAX
LABORATORIES, INC.
1835 W. 205th Street
Torrance, CA 90501
Tel: (310) 618-8889
Fax: (310) 618-0818

Date: 12-27-2004
EMAX Batch No.: 04L142

Attn: Diane Meyer

Shaw E&I
1430 Enclave Parkway
Houston TX 77077

Subject: Laboratory Report
Project: Longhorn Army Ammunition Plant

Enclosed is the Laboratory report for samples received on
12/17/04. The data reported include :

Sample ID	Control #	Col Date	Matrix	Analysis
29SB81-001	L142-01	12/16/04	SOIL	NITROAROMATICS & NITRAMINES
29SB81-002	L142-02	12/16/04	SOIL	NITROAROMATICS & NITRAMINES
29SD38-MH07	L142-03	12/16/04	SOIL	NITROAROMATICS & NITRAMINES
29SD39-MH08	L142-04	12/16/04	SOIL	NITROAROMATICS & NITRAMINES
29SD41-MH10	L142-05	12/16/04	SOIL	NITROAROMATICS & NITRAMINES
29SD46	L142-06	12/16/04	SOIL	NITROAROMATICS & NITRAMINES
29SW46	L142-07	12/16/04	WATER	NITROAROMATICS & NITRAMINES

The results are summarized on the following pages.

Please feel free to call if you have any questions concerning
these results.

Sincerely yours,

Kam Y. Pang, Ph.D.
Laboratory Director



Shaw Environmental & Infrastructure, Inc.

1430 Enclave Parkway
Houston, TX 77077 (281) 368-4000

B6

CHAIN-OF-CUSTODY

00091385

No. 29-EMAX-DELL

042142

Laboratory Name: EMAX		Address: 1835 205th Street Torrance, CA 90501		Contact: Joe Kelbley											
Project Name Longhorn AAP		Project Location Area 29 Former INI Production Area		Analysis and Method Desired (Indicate separate containers)											
Project No. 845714		Project Contact Diane Meyer		Project Telephone No. 281-368-4404											
USACE Point of contact: Cliff Murray		Project Manager/Supervisor Praveen Srivastav		Remarks											
USACE Telephone No.															
Item No.	Sample Number	Date	Time	Comp	Grab	Matrix	Sample Description, Location	Number of Containers	Nitroaromatics and Nitroamines by 8330	Perchlorate by 314.0					
1	29SB80-001					SOIL	29SB80	1	X						
2	29SB80-002					SOIL	29SB80	1	X						
3	29SB81-001	12/16/04	0900		X	SOIL	29SB81	1	X						
4	29SB81-002	12/16/04	0905		X	SOIL	29SB81	1	X						
5	29SB82-001					SOIL	29SB82	1	X						
6	29SB82-002					SOIL	29SB82	1	X						
7	29SB83-001					SOIL	29SB83	1	X						
8	29SB83-002					SOIL	29SB83	1	X						
9	29SB84-001					SOIL	29SB84	1	X						
10	29SB84-002					SOIL	29SB84	1	X						
Transfers Relinquished By (Signature)		Date/Time		Transfers Accepted By (Signature)		Date/Time		Special Instructions							
		1400 12/16/04				12/17/04 0930									
								FedEx Airbill No.: 66V 725							
								Sampler's Signature							
TAT: 7 days Standard		Rush Due: 7 days		Seals Intact? <input checked="" type="checkbox"/> Y <input type="checkbox"/> N		Received Good Condition <input checked="" type="checkbox"/> Y <input type="checkbox"/> N Cold		3.4°C							

White - Lab Copy Canary - Field Copy Pink - File Copy

1001



Shaw Environmental & Infrastructure, Inc.

1430 Enclave Parkway
Houston, TX 77077 (281) 368-4000
Tulsa TERC DACA56-94-D-0020

00091386

CHAIN-OF-CUSTODY

No. 29-EMAX-DEC04-005

042142

Laboratory Name: EMAX				Address: 1835 205th Street Torrance, CA 90501				Contact:								
Project Name Longhorn AAP				Project Location Area 29 Former INT Production Area				Analysis and Method Desired (Indicate separate containers)				Remarks				
Project No. 845714				Project Contact Diane Meyer		Project Telephone No. 281-368-4404		Number of Containers	Nitroaromatics and Nitroamines by 8330	Perchlorate by 314.0						
USACE Point of contact: Cliff Murray				Project Manager/Supervisor Praveen Srivastav												
USACE Telephone No.																
Item No.	Sample Number	Date	Time	Comp	Grab	Matrix	Sample Description, Location									
1	29SD32-MH01					SED	29SD32-MH01	1	X							
2	29SD33-MH02					SED	29SD33-MH02	1	X							
3	29SD34-MH03					SED	29SD34-MH03	1	X							
4	29SD35-MH04					SED	29SD35-MH04	1	X							
5	29SD36-MH05					SED	29SD36-MH05	1	X							
6	29SD37-MH06					SED	29SD37-MH06	1	X							
7	29SD38-MH07	12/16/04	12:45			SED	29SD38-MH07	1	X							
8	29SD39-MH08	12/16/04	1303			SED	29SD39-MH08	1	X							
9																
10																
Transfers Relinquished By (Signature)				Date/Time		Transfers Accepted By (Signature)				Date/Time		Special Instructions				
<i>[Signature]</i>				12/16/04 1600		<i>[Signature]</i>										
												FedEx Airbill No.: 600 725				
						Laboratory: <i>[Signature]</i>				12/17/04 0930		Sampler's Signature <i>[Signature]</i>				
TAT: 7 day Standard				Rush Due: 7 days		Seals Intact? <input checked="" type="checkbox"/> Y <input type="checkbox"/> N		Received Good Condition <input checked="" type="checkbox"/> Y <input type="checkbox"/> N		Cold <input checked="" type="checkbox"/> 3.4°C						

White - Lab Copy Canary - Field Copy Pink - File Copy

1002



Shaw Environmental & Infrastructure, Inc.

1430 Enclave Parkway
Houston, TX 77077 (281) 368-4000
Tulsa TERC DACA56-94-D-0020

00091388

CHAIN-OF-CUSTODY

No. 29-EMAX-DEC04-007

041142

Laboratory Name: EMAX				Address: 1835 205th Street Torrance, CA 90501				Contact: Joe Kelbley						
Project Name Longhorn AAP				Project Location Area 29 Former TNT Production Area				Analysis and Method Desired (Indicate separate containers)				Remarks		
Project No. 845714				Project Contact Diane Meyer				Project Telephone No. 281-368-4404				Number of Containers Nitroaromatics and Nitroamines by 8330 Perchlorate by 314.0		
USACE Point of contact: Cliff Murray				Project Manager/Supervisor Praveen Srivastav										
USACE Telephone No.														
Item No.	Sample Number	Date	Time	Comp	Grab	Matrix	Sample Description, Location							
1	29SW44					SW	29SW44	2	X					
2	29SW45					SW	29SW45	2	X					
7 3	29SW46	12/16/04	15:10			SW	29SW46	2	X					
4	29SW -QC					SW	29SW -QC	2	X					
5														
6														
7														
8														
9														
10														
Transfers Relinquished By (Signature)				Date/Time		Transfers Accepted By (Signature)				Date/Time		Special Instructions		
				12/16/04 16:00										
												FedEx Airbill No.: 66V725 Sampler's Signature:		
TAT: <u>7 days</u> Standard				Rush Due: <u>7 days</u>		Seals Intact? <u>Y</u> <u>N</u>				Received Good Condition <u>Y</u> <u>N</u>		Cold <u>3.4°C</u>		

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00091390

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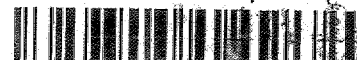
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1003

REPORTING CONVENTIONS**DATA QUALIFIERS:**

Lab Qualifier	AFCEE Qualifier	Description
J	F	Indicates that the analyte is positively identified and the result is less than RL but greater than MDL.
N		Indicates presumptive evidence of a compound.
B	B	Indicates that the analyte is found in the associated method blank as well as in the sample at above QC level.
E	J	Indicates that the result is above the maximum calibration range.
*	*	Out of QC limit.

Note: The above qualifiers are used to flag the results unless the project requires a different set of qualification criteria.

ACRONYMS AND ABBREVIATIONS:

CRDL	Contract Required Detection Limit
RL	Reporting Limit
MRL	Method Reporting Limit
PQL	Practical Quantitation Limit
MDL	Method Detection Limit
DO	Diluted out

DATES

The date and time information for leaching and preparation reflect the beginning date and time of the procedure unless the method, protocol, or project specifically requires otherwise.

00091392

LABORATORY REPORT FOR

SHAW E&I

LONGHORN ARMY AMMUNITION PLANT

EPA METHOD 8330
EXPLOSIVES

SDG#: 04L142

6000

CASE NARRATIVE

CLIENT: SHAW E&I
PROJECT: LONG HORN ARMY AMMUNITION PLANT
EMAX SDG: 04L142

**EPA METHOD 8330
EXPLOSIVES**

One (1) water and six (6) soil samples were received on 12/17/04 for Explosives analysis by EPA Method 8330 in accordance with USEPA-SW846 3rd edition, and EMAX-8330.

1. Holding Time

Analytical holding time was met. Extraction for water samples was started and completed on 12/20/04. Extraction for soil samples was started on 12/20/04 and completed on 12/21/04.

2. Calibration

Initial calibration was 5 point. %RSDs were within 20%. All continuing calibrations of the primary column were carried out at 12-hour intervals and the recoveries were within 85-115%.

3. Method Blank

Method blanks were free of contamination at the Reporting Limit.

4. Surrogate recovery

Surrogate recoveries in samples L142-05T, 06T, 06J, 07T and 07I were diluted out. All surrogate recoveries in other samples were within QC limits.

5. Lab Control Sample / Lab Control Duplicate

All recoveries were within QC limits.

6. Matrix Spike/Matrix Spike Duplicate

No sample was spiked.

7. Sample Analysis

Sample analyses were within QC requirements. Quantitation is from the primary column. All positive results above RL were confirmed by LC-CN column and the confirmation is presumptive because it was based on retention time window.

Samples were air-dried prior to extraction; hence, no moisture correction was applied to RL, MDL and results.

Sample L142-06 could only be analyzed as a dilution due to dark discoloration of sample extract.

LAB CHRONICLE
EXPLOSIVES

00091394

Client : SHAW E&I
Project : LONGHORN ARMY AMMUNITION PLANT

SDG NO. : 04L142
Instrument ID : T081

SOIL									
Client Sample ID	Laboratory Sample ID	Dilution Factor	% Moist	Analysis DateTime	Extraction DateTime	Sample Data FN	Calibration Data FN	Prep. Batch	Notes
MBLK1S	EXL005SB	1	NA	12/21/0417:34	12/20/0417:30	XL21013A	XL21012A	EXL005S	Method Blank
LCS1S	EXL005SL	1	NA	12/21/0418:03	12/20/0417:30	XL21014A	XL21012A	EXL005S	Lab Control Sample (LCS)
29SB81-001	L142-01	1	NA	12/22/0402:13	12/20/0417:30	XL21031A	XL21030A	EXL005S	Field Sample
29SB81-002	L142-02	1	NA	12/22/0402:42	12/20/0417:30	XL21032A	XL21030A	EXL005S	Field Sample
29SD38-MH07	L142-03	1	NA	12/22/0407:59	12/20/0417:30	XL21043A	XL21042A	EXL005S	Field Sample
29SD39-MH08	L142-04	1	NA	12/22/0408:57	12/20/0417:30	XL21045A	XL21042A	EXL005S	Field Sample
29SD41-MH10	L142-05	1	NA	12/22/0409:26	12/20/0417:30	XL21046A	XL21042A	EXL005S	Field Sample
29SD41-MH10DL	L142-05T	10	NA	12/22/0405:35	12/20/0417:30	XL21038A	XL21030A	EXL005S	Diluted Sample
29SD46	L142-06T	10	NA	12/22/0406:32	12/20/0417:30	XL21040A	XL21030A	EXL005S	Diluted Sample
29SD46DL	L142-06J	5000	NA	12/22/0410:23	12/20/0417:30	XL21048A	XL21042A	EXL005S	Diluted Sample

WATER									
Client Sample ID	Laboratory Sample ID	Dilution Factor	% Moist	Analysis DateTime	Extraction DateTime	Sample Data FN	Calibration Data FN	Prep. Batch	Notes
MBLK1W	EXL004WB	1	NA	12/20/0418:27	12/20/0413:00	XL20004A	XL20003A	EXL004W	Method Blank
LCS1W	EXL004WL	1	NA	12/20/0418:56	12/20/0413:00	XL20005A	XL20003A	EXL004W	Lab Control Sample (LCS)
LCD1W	EXL004WC	1	NA	12/20/0419:24	12/20/0413:00	XL20006A	XL20003A	EXL004W	LCS Duplicate
29SW46	L142-07	1	NA	12/20/0420:51	12/20/0413:00	XL20009A	XL20003A	EXL004W	Field Sample
29SW46DL1	L142-07T	10	NA	12/21/0416:08	12/20/0413:00	XL21010A	XL21002A	EXL004W	Diluted Sample
29SW46DL2	L142-07I	100	NA	12/21/0415:39	12/20/0413:00	XL21009A	XL21002A	EXL004W	Diluted Sample

FN - Filename
% Moist - Percent Moisture

6002

00091395

SAMPLE RESULTS

6003

EPA METHOD 8330
EXPLOSIVES

00091396

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=====
Client      : SHAW E&I                      Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 17:30
Sample ID: 29SB81-001                     Date Analyzed: 12/22/04 02:13
Lab Samp ID: L142-01                      Dilution Factor: 1
Lab File ID: XL21031A                     Matrix       : SOIL
Ext Btch ID: EXL005S                      % Moisture   : NA
Calib. Ref.: XL21030A                     Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	101	63-143

Note: All positive results are confirmed by CN column

6004

EPA METHOD 8330
EXPLOSIVES

00091397

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=====
Client      : SHAW E&I                      Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 17:30
Sample ID   : 29SB81-002                   Date Analyzed: 12/22/04 02:42
Lab Samp ID : L142-02                      Dilution Factor: 1
Lab File ID : XL21032A                     Matrix          : SOIL
Ext Btch ID : EXL005S                      % Moisture      : NA
Calib. Ref. : XL21030A                     Instrument ID   : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	102	63-143

Note: All positive results are confirmed by CN column

6005

EPA METHOD 8330
EXPLOSIVES

00091398

```

=====
Client      : SHAW E&I           Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142            Date Extracted: 12/20/04 17:30
Sample ID   : 29SD38-MH07       Date Analyzed: 12/22/04 07:59
Lab Samp ID : L142-03           Dilution Factor: 1
Lab File ID : XL21043A          Matrix      : SOIL
Ext Btch ID : EXL005S           % Moisture   : NA
Calib. Ref. : XL21042A          Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	630	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	102	63-143

Note: All positive results are confirmed by CN column

6006

EPA METHOD 8330
EXPLOSIVES

00091399

```

=====
Client      : SHAW E&I                      Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 17:30
Sample ID   : 29SD39-MH08                  Date Analyzed: 12/22/04 08:57
Lab Samp ID : L142-04                      Dilution Factor: 1
Lab File ID : XL21045A                     Matrix          : SOIL
Ext Btch ID : EXL005S                      % Moisture      : NA
Calib. Ref. : XL21042A                     Instrument ID   : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	5500	400	200
4-AM-2,6-DNT	880	400	200
2-AM-4,6-DNT	1200	400	200
2,6-DNT	300J	400	200
2,4-DNT	710	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	104	63-143

Note: All positive results are confirmed by CN column

6007

EPA METHOD 8330
EXPLOSIVES

00091400

```

=====
Client      : SHAW E&I                      Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 17:30
Sample ID   : 29SD41-MH10                  Date Analyzed: 12/22/04 09:26
Lab Samp ID : L142-05                      Dilution Factor: 1
Lab File ID : XL21046A                     Matrix          : SOIL
Ext Btch ID : EXL005S                      % Moisture       : NA
Calib. Ref. : XL21042A                     Instrument ID    : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	7000	400	200
4-AM-2,6-DNT	7800	400	200
2-AM-4,6-DNT	9200E	400	200
2,6-DNT	240J	400	200
2,4-DNT	1100	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	101	63-143

Note: All positive results are confirmed by CN column

6008

EPA METHOD 8330
EXPLOSIVES

00091401

```

=====
Client      : SHAW E&I                      Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 17:30
Sample ID   : 29SD41-MH10DL                 Date Analyzed: 12/22/04 05:35
Lab Samp ID : L142-05T                      Dilution Factor: 10
Lab File ID : XL21038A                      Matrix       : SOIL
Ext Btch ID : EXL005S                       % Moisture    : NA
Calib. Ref. : XL21030A                     Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	4000	2000
RDX	ND	4000	2000
1,3,5-TNB	ND	4000	2000
1,3-DNB	ND	4000	2000
TETRYL	ND	4000	2000
NITROBENZENE	ND	4000	2000
2,4,6-TNT	7300	4000	2000
4-AM-2,6-DNT	7800	4000	2000
2-AM-4,6-DNT	9000	4000	2000
2,6-DNT	ND	4000	2000
2,4-DNT	ND	4000	2000
2-NITROTOLUENE	ND	4000	2000
3-NITROTOLUENE	ND	4000	2000
4-NITROTOLUENE	ND	4000	2000

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	DO	63-143

Note: All positive results are confirmed by CN column
DO: Diluted Out

6009

EPA METHOD 8330
EXPLOSIVES

00091402

```

=====
Client      : SHAW E&I                      Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142                        Date Extracted: 12/20/04 17:30
Sample ID   : 29SD46                        Date Analyzed: 12/22/04 06:32
Lab Samp ID : L142-06T                      Dilution Factor: 10
Lab File ID : XL21040A                      Matrix       : SOIL
Ext Btch ID : EXL005S                      % Moisture    : NA
Calib. Ref. : XL21030A                      Instrument ID : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	4000	2000
RDX	ND	4000	2000
1,3,5-TNB	ND	4000	2000
1,3-DNB	ND	4000	2000
TETRYL	ND	4000	2000
NITROBENZENE	ND	4000	2000
2,4,6-TNT	11000000E	4000	2000
4-AM-2,6-DNT	ND	4000	2000
2-AM-4,6-DNT	48000	4000	2000
2,6-DNT	15000	4000	2000
2,4-DNT	3500000E	4000	2000
2-NITROTOLUENE	ND	4000	2000
3-NITROTOLUENE	ND	4000	2000
4-NITROTOLUENE	ND	4000	2000

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	DO	63-143

Note: All positive results are confirmed by CN column
DO: Diluted Out

6010

EPA METHOD 8330
EXPLOSIVES

00091403

```

=====
Client      : SHAW E&I                      Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 17:30
Sample ID   : 29SD46DL                     Date Analyzed: 12/22/04 10:23
Lab Samp ID : L142-06J                     Dilution Factor: 5000
Lab File ID : XL21048A                     Matrix          : SOIL
Ext Btch ID : EXL005S                      % Moisture       : NA
Calib. Ref. : XL21042A                     Instrument ID    : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	2000000	1000000
RDX	ND	2000000	1000000
1,3,5-TNB	ND	2000000	1000000
1,3-DNB	ND	2000000	1000000
TETRYL	ND	2000000	1000000
NITROBENZENE	ND	2000000	1000000
2,4,6-TNT	26000000	2000000	1000000
4-AM-2,6-DNT	ND	2000000	1000000
2-AM-4,6-DNT	ND	2000000	1000000
2,6-DNT	ND	2000000	1000000
2,4-DNT	8000000	2000000	1000000
2-NITROTOLUENE	ND	2000000	1000000
3-NITROTOLUENE	ND	2000000	1000000
4-NITROTOLUENE	ND	2000000	1000000

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	DO	63-143

Note: All positive results are confirmed by CN column
DO: Diluted Out

6011

EPA METHOD 8330
EXPLOSIVES

00091404

```

=====
Client      : SHAW E&I                      Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 13:00
Sample ID   : 29SW46                       Date Analyzed: 12/20/04 20:51
Lab Samp ID : L142-07                      Dilution Factor: 1
Lab File ID : XL20009A                     Matrix          : WATER
Ext Btch ID : EXL004W                     % Moisture      : NA
Calib. Ref. : XL20003A                     Instrument ID   : T-081
=====
  
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)	MDL (ug/L)
-----	-----	-----	-----
HMX	ND	1	.2
RDX	ND	1	.2
1,3,5-TNB	.73	1	.2
1,3-DNB	ND	1	.2
TETRYL	ND	1	.2
NITROBENZENE	ND	1	.2
2,4,6-TNT	820E	1	.2
4-AM-2,6-DNT	49E	1	.2
2-AM-4,6-DNT	21E	1	.2
2,6-DNT	7.6	1	.2
2,4-DNT	20E	1	.2
2-NITROTOLUENE	ND	1	.2
3-NITROTOLUENE	ND	1	.2
4-NITROTOLUENE	ND	1	.2

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	108	63-143

Note: All positive results are confirmed by CN column

6012

EPA METHOD 8330
EXPLOSIVES

00091405

```

=====
Client      : SHAW E&I                      Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 13:00
Sample ID   : 29SW46DL1                    Date Analyzed: 12/21/04 16:08
Lab Samp ID : L142-07T                     Dilution Factor: 10
Lab File ID : XL21010A                     Matrix          : WATER
Ext Btch ID : EXL004W                      % Moisture      : NA
Calib. Ref. : XL21002A                     Instrument ID   : T-081
=====
  
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)	MDL (ug/L)
-----	-----	-----	-----
HMX	ND	10	2
RDX	ND	10	2
1,3,5-TNB	ND	10	2
1,3-DNB	ND	10	2
TETRYL	ND	10	2
NITROBENZENE	ND	10	2
2,4,6-TNT	780E	10	2
4-AM-2,6-DNT	48	10	2
2-AM-4,6-DNT	20	10	2
2,6-DNT	7.1J	10	2
2,4-DNT	19	10	2
2-NITROTOLUENE	ND	10	2
3-NITROTOLUENE	ND	10	2
4-NITROTOLUENE	ND	10	2

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	DO	63-143

Note: All positive results are confirmed by CN column
DO: Diluted Out

6013

EPA METHOD 8330
EXPLOSIVES

00091406

```

=====
Client      : SHAW E&I                      Date Collected: 12/16/04
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/17/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 13:00
Sample ID   : 29SW46DL2                   Date Analyzed: 12/21/04 15:39
Lab Samp ID : L142-071                     Dilution Factor: 100
Lab File ID : XL21009A                     Matrix          : WATER
Ext Btch ID : EXL004W                      % Moisture      : NA
Calib. Ref. : XL21002A                     Instrument ID   : T-081
=====
  
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)	MDL (ug/L)
-----	-----	-----	-----
HMX	ND	100	20
RDX	ND	100	20
1,3,5-TNB	ND	100	20
1,3-DNB	ND	100	20
TETRYL	ND	100	20
NITROBENZENE	ND	100	20
2,4,6-TNT	860	100	20
4-AM-2,6-DNT	47J	100	20
2-AM-4,6-DNT	ND	100	20
2,6-DNT	ND	100	20
2,4-DNT	ND	100	20
2-NITROTOLUENE	ND	100	20
3-NITROTOLUENE	ND	100	20
4-NITROTOLUENE	ND	100	20

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	DO	63-143

Note: All positive results are confirmed by CN column
DO: Diluted Out

6014

00091407

QC SUMMARIES

6015

EPA METHOD 8330
EXPLOSIVES

00091408

```

=====
Client      : SHAW E&I                      Date Collected: NA
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/20/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 13:00
Sample ID   : MBLK1W                       Date Analyzed: 12/20/04 18:27
Lab Samp ID : EXL004WB                     Dilution Factor: 1
Lab File ID : XL20004A                     Matrix          : WATER
Ext Btch ID : EXL004W                      % Moisture       : NA
Calib. Ref. : XL20003A                     Instrument ID    : T-081
=====
  
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)	MDL (ug/L)
-----	-----	-----	-----
HMX	ND	1	.2
RDX	ND	1	.2
1,3,5-TNB	ND	1	.2
1,3-DNB	ND	1	.2
TETRYL	ND	1	.2
NITROBENZENE	ND	1	.2
2,4,6-TNT	ND	1	.2
4-AM-2,6-DNT	ND	1	.2
2-AM-4,6-DNT	ND	1	.2
2,6-DNT	ND	1	.2
2,4-DNT	ND	1	.2
2-NITROTOLUENE	ND	1	.2
3-NITROTOLUENE	ND	1	.2
4-NITROTOLUENE	ND	1	.2

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	100	63-143

Note: All positive results are confirmed by CN column

6016

EMAX QUALITY CONTROL DATA
LCS/LCD ANALYSIS

00091409

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
BATCH NO.: 04L142
METHOD: EPA 8330

MATRIX: WATER % MOISTURE: NA
DILUTION FACTOR: 1 1
SAMPLE ID: MBLK1W
LAB SAMP ID: EXL004WB EXL004WL EXL004WC
LAB FILE ID: XL20004A XL20005A XL20006A
DATE EXTRACTED: 12/20/0413:00 12/20/0413:00 12/20/0413:00 DATE COLLECTED: NA
DATE ANALYZED: 12/20/0418:27 12/20/0418:56 12/20/0419:24 DATE RECEIVED: 12/20/04
PREP. BATCH: EXL004W EXL004W EXL004W
CALIB. REF: XL20003A XL20003A XL20003A

ACCESSION:

PARAMETER	BLNK RSLT (ug/L)	SPIKE AMT (ug/L)	BS RSLT (ug/L)	BS % REC	SPIKE AMT (ug/L)	BSD RSLT (ug/L)	BSD % REC	RPD (%)	QC LIMIT (%)	MAX RPD (%)
HMX	ND	4	3.84	96	4	3.99	100	4	70-130	30
RDX	ND	4	3.31	83	4	3.19	80	4	60-130	30
1,3,5-TNB	ND	4	4.03	101	4	4.06	101	1	70-130	30
1,3-DNB	ND	4	3.85	96	4	3.86	96	0	70-130	30
Tetryl	ND	4	4.08	102	4	4.1	102	0	50-140	30
Nitrobenzene	ND	4	3.62	90	4	3.64	91	1	60-130	30
2,4,6-TNT	ND	4	4.18	105	4	4.22	105	1	70-140	30
4-AM-2,6-DNT	ND	4	3.92	98	4	3.92	98	0	70-130	30
2-AM-4,6-DNT	ND	4	4.01	100	4	4.04	101	1	70-130	30
2,6-DNT	ND	4	4.03	101	4	4.07	102	1	70-130	30
2,4-DNT	ND	4	4.13	103	4	4.12	103	0	70-130	30
2-Nitrotoluene	ND	4	3.81	95	4	3.81	95	0	70-130	30
3-Nitrotoluene	ND	4	3.99	100	4	4.02	100	1	70-130	30
4-Nitrotoluene	ND	4	4.02	100	4	4.07	102	1	70-130	30

SURROGATE PARAMETER	SPIKE AMT (ug/L)	BS RSLT (ug/L)	BS % REC	SPIKE AMT (ug/L)	BSD RSLT (ug/L)	BSD % REC	QC LIMIT (%)
3,4-Dinitrotoluene	4	4.09	102	4	4.27	107	70-130

6017

EPA METHOD 8330
EXPLOSIVES

00091410

```

=====
Client      : SHAW E&I                      Date Collected: NA
Project     : LONGHORN ARMY AMMUNITION PLANT Date Received: 12/20/04
Batch No.   : 04L142                       Date Extracted: 12/20/04 17:30
Sample ID   : MBLK1S                       Date Analyzed: 12/21/04 17:34
Lab Samp ID : EXL005SB                     Dilution Factor: 1
Lab File ID : XL21013A                     Matrix          : SOIL
Ext Btch ID : EXL005S                     % Moisture       : NA
Calib. Ref. : XL21012A                     Instrument ID    : T-081
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)	MDL (ug/kg)
-----	-----	-----	-----
HMX	ND	400	200
RDX	ND	400	200
1,3,5-TNB	ND	400	200
1,3-DNB	ND	400	200
TETRYL	ND	400	200
NITROBENZENE	ND	400	200
2,4,6-TNT	ND	400	200
4-AM-2,6-DNT	ND	400	200
2-AM-4,6-DNT	ND	400	200
2,6-DNT	ND	400	200
2,4-DNT	ND	400	200
2-NITROTOLUENE	ND	400	200
3-NITROTOLUENE	ND	400	200
4-NITROTOLUENE	ND	400	200

SURROGATE PARAMETERS	% RECOVERY	QC LIMIT
-----	-----	-----
3,4-DINITROTOLUENE	103	63-143

Note: All positive results are confirmed by CN column

6013

EMAX QUALITY CONTROL DATA
LCS ANALYSIS

00091411

CLIENT: SHAW E&I
PROJECT: LONGHORN ARMY AMMUNITION PLANT
BATCH NO.: 04L142
METHOD: EPA 8330

MATRIX: SOIL % MOISTURE: NA
DILUTION FACTOR: 1 1
SAMPLE ID: MBLK1S
LAB SAMP ID: EXL005SB EXL005SL
LAB FILE ID: XL21013A XL21014A
DATE EXTRACTED: 12/20/04 17:30 12/20/04 17:30 DATE COLLECTED: NA
DATE ANALYZED: 12/21/04 17:34 12/21/04 18:03 DATE RECEIVED: 12/20/04
PREP. BATCH: EXL005S EXL005S
CALIB. REF: XL21012A XL21012A

ACCESSION:

PARAMETER	BLNK RSLT (ug/kg)	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	QC LIMIT (%)
HMX	ND	2000	2110	106	70-140
RDX	ND	2000	2100	105	70-140
1,3,5-TNB	ND	2000	2180	109	70-130
1,3-DNB	ND	2000	2180	109	70-130
Tetryl	ND	2000	2080	104	60-140
Nitrobenzene	ND	2000	2190	109	70-130
2,4,6-TNT	ND	2000	2180	109	70-140
4-AM-2,6-DNT	ND	2000	2160	108	70-130
2-AM-4,6-DNT	ND	2000	2170	109	70-130
2,6-DNT	ND	2000	2120	106	70-140
2,4-DNT	ND	2000	2140	107	70-130
2-Nitrotoluene	ND	2000	2000	100	70-130
3-Nitrotoluene	ND	2000	2090	105	70-130
4-Nitrotoluene	ND	2000	2090	105	70-130

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	QC LIMIT (%)
3,4-Dinitrotoluene	2000	2260	113	70-130

6019

INITIAL CALIBRATION

INITIAL CALIBRATION
METHOD 8330

00091413

Lab Name : EMAX Inc
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
LFID & Datetime: XJ19016A 10/19/04 19:08
LFID & Datetime: XJ19017A 10/19/04 19:36
LFID & Datetime: XJ19013A 10/19/04 17:41
LFID & Datetime: XJ19014A 10/19/04 18:10
LFID & Datetime: XJ19015A 10/19/04 18:39
CONC UNIT: ppb

COMPOUND	CONC X	CALIBRATION FACTORS (AREA or HEIGHT)/UNIT					MEAN	%RSD
		1.00X	5.00X	10.00X	20.00X	40.00X		
=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	20.00	69.25	67.82	72.36	72.87	71.66	70.79	3.1
RDX	20.00	80.55	89.55	93.32	92.82	91.48	89.54	5.8
1,3,5-TNB	20.00	212.60	206.29	208.40	210.28	208.06	209.13	1.1
1,3-DNB	20.00	284.05	289.17	293.78	291.57	290.36	289.79	1.3
Tetryl	20.00	169.65	165.60	171.93	171.00	171.53	169.94	1.5
Nitrobenzene	20.00	196.75	195.67	202.54	203.55	201.64	200.03	1.8
2,4,6-TNT	20.00	206.40	200.92	203.90	208.44	205.06	204.94	1.4
4-AM-2,6-DNT	20.00	156.75	144.28	146.21	146.58	146.43	148.05	3.3
2-AM-4,6-DNT	20.00	229.95	205.98	210.31	215.07	216.25	215.51	4.2
2,6-DNT	20.00	137.60	131.99	135.36	140.29	135.29	136.11	2.3
2,4-DNT	20.00	276.20	270.64	273.11	277.46	281.68	275.82	1.5
2-Nitrotoluene	20.00	130.40	127.75	127.93	129.28	128.10	128.69	0.9
4-Nitrotoluene	20.00	104.40	103.10	107.11	109.25	110.43	106.86	2.9
3-Nitrotoluene	20.00	132.95	130.43	138.71	137.68	140.89	136.13	3.2
-----	-----	-----	-----	-----	-----	-----	-----	-----
SURROGATE	X	1.00X	5.00X	10.00X	20.00X	40.00X	MEAN	%RSD
=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	20.00	117.40	121.21	124.62	126.61	126.82	123.33	3.2

EX81J19.MET

RA 6021
107 2 567

INITIAL CALIBRATION
METHOD 8330

00091414

Lab Name : EMAX Inc
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
LFID & Datetime: XJ19016A 10/19/04 19:08
LFID & Datetime: XJ19017A 10/19/04 19:36
LFID & Datetime: XJ19013A 10/19/04 17:41
LFID & Datetime: XJ19014A 10/19/04 18:10
LFID & Datetime: XJ19015A 10/19/04 18:39

COMPOUND	RT OF STANDARDS (MIN)					MEAN	RT WINDOW		RTWINDOW
	1.0X	5.0X	10.0X	20.0X	40.0X	RT	FROM	TO	WIDTH
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.300	4.292	4.292	4.292	4.275	4.290	4.240	4.340	0.050
RDX	6.433	6.383	6.367	6.375	6.333	6.378	6.240	6.516	0.138
1,3,5-TNB	8.650	8.617	8.600	8.633	8.575	8.615	8.462	8.768	0.153
1,3-DNB	10.492	10.450	10.417	10.483	10.400	10.448	10.219	10.677	0.229
Tetryl	11.358	11.308	11.250	11.342	11.250	11.302	11.014	11.590	0.288
Nitrobenzene	12.117	12.092	12.042	12.108	12.033	12.078	11.677	12.479	0.401
2,4,6-TNT	13.675	13.642	13.567	13.642	13.575	13.620	13.219	14.021	0.401
4-AM-2,6-DNT	14.433	14.392	14.292	14.383	14.308	14.362	13.857	14.867	0.505
2-AM-4,6-DNT	14.967	14.983	14.867	14.950	14.883	14.930	14.382	15.478	0.548
2,6-DNT	15.817	15.825	15.742	15.800	15.758	15.788	15.325	16.251	0.463
2,4-DNT	16.383	16.425	16.317	16.367	16.350	16.368	15.891	16.845	0.477
2-Nitrotoluene	19.467	19.525	19.442	19.458	19.467	19.472	18.881	20.063	0.591
4-Nitrotoluene	21.192	21.225	21.150	21.175	21.142	21.177	20.520	21.834	0.657
3-Nitrotoluene	22.658	22.717	22.592	22.633	22.600	22.640	21.888	23.392	0.752
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
SURROGATE	1.0X	5.0X	10.0X	20.0X	40.0X	RT	FROM	TO	WIDTH
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.900	12.858	12.792	12.875	12.792	12.843	12.468	13.218	0.375

EX81J19.MET

RA 6022
10/25/04

SECOND SOURCE

INITIAL CALIBRATION VERIFICATION
METHOD 8330

00091416

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XJ19018A 10/19/2004 20:05
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.300	4.250	4.350	400.0	70.800	31158	440.13	10		15
RDX	6.400	6.262	6.538	400.0	89.500	38533	430.32	8		15
1,3,5-TNB	8.642	8.489	8.795	400.0	209.100	91920	439.54	10		15
1,3-DNB	10.483	10.254	10.712	400.0	289.800	127403	439.64	10		15
Tetryl	11.342	11.054	11.630	400.0	169.900	71202	418.98	5		15
Nitrobenzene	12.108	11.707	12.509	400.0	200.000	86805	433.96	8		15
2,4,6-TNT	13.625	13.224	14.026	400.0	204.900	88599	432.31	8		15
4-AM-2,6-DNT	14.400	13.895	14.905	400.0	148.100	60914	411.44	3		15
2-AM-4,6-DNT	14.950	14.402	15.498	400.0	215.500	91200	423.18	6		15
2,6-DNT	15.800	15.337	16.263	400.0	136.100	56248	413.27	3		15
2,4-DNT	16.383	15.906	16.860	400.0	275.800	117421	425.72	6		15
2-Nitrotoluene	19.475	18.884	20.066	400.0	128.700	53460	415.40	4		15
4-Nitrotoluene	21.192	20.535	21.849	400.0	106.900	46579	435.89	9		15
3-Nitrotoluene	22.667	21.915	23.419	400.0	136.100	57575	422.93	6		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.875	12.500	13.250	400.0	123.300	52174	423.04	6		15

EX81J19.MET

6024

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INITIAL CALIBRATION
METHOD 8330

00091417

Lab Name : EMAX Inc
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
LFID & Datetime: PH17007A 08/17/04 16:21
LFID & Datetime: PH17003A 08/17/04 13:35
LFID & Datetime: PH17004A 08/17/04 14:16
LFID & Datetime: PH17005A 08/17/04 14:58
LFID & Datetime: PH17006A 08/17/04 15:39
CONC UNIT: ppb

COMPOUND	CONC X	CALIBRATION FACTORS (AREA or HEIGHT)/UNIT					MEAN	%RSD
		1.00X	5.00X	10.00X	20.00X	40.00X		
=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	20.00	265.05	223.86	243.86	247.42	244.74	244.99	6.0
RDX	20.00	315.15	255.37	260.41	253.93	258.37	268.65	9.7
Nitrobenzene	20.00	359.70	349.71	329.86	323.97	326.71	337.99	4.7
1,3-DNB	20.00	514.05	508.34	520.54	516.70	515.48	515.02	0.9
2-Nitrotoluene	20.00	238.50	278.15	281.94	287.52	281.20	273.46	7.3
4-Nitrotoluene	20.00	287.00	275.75	289.34	288.21	284.04	284.87	1.9
4-AM-2,6-DNT	20.00	276.50	256.61	256.86	264.78	254.15	261.78	3.5
3-Nitrotoluene	20.00	353.75	380.73	345.64	344.94	337.55	352.52	4.8
2-AM-4,6-DNT	20.00	464.60	447.94	400.02	400.57	393.79	421.38	7.7
1,3,5-TNB	20.00	368.85	364.11	349.42	354.06	340.07	355.30	3.2
2,6-DNT	20.00	258.20	256.25	261.51	248.39	253.99	255.67	1.9
2,4-DNT	20.00	433.50	511.11	524.55	509.46	513.54	498.43	7.4
Tetryl	20.00	511.65	504.42	558.66	520.24	525.23	524.04	4.0
2,4,6-TNT	20.00	421.55	507.22	574.38	536.85	548.40	517.68	11.4
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SURROGATE	X	1.00X	5.00X	10.00X	20.00X	40.00X	MEAN	%RSD
=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	20.00	288.40	260.85	245.15	244.29	241.54	256.04	7.7

EX17H17C.MET

18
8/20/04
6025

INITIAL CALIBRATION
METHOD 8330

00091418

Lab Name : EMAX Inc
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
LFID & Datetime: PH17007A 08/17/04 16:21
LFID & Datetime: PH17003A 08/17/04 13:35
LFID & Datetime: PH17004A 08/17/04 14:16
LFID & Datetime: PH17005A 08/17/04 14:58
LFID & Datetime: PH17006A 08/17/04 15:39

COMPOUND	RT OF STANDARDS (MIN)					MEAN	RT WINDOW		RTWINDOW
	1.0X	5.0X	10.0X	20.0X	40.0X	RT	FROM	TO	WIDTH
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.025	6.050	6.042	6.058	6.033	6.042	5.962	6.122	0.080
RDX	7.800	7.817	7.817	7.833	7.792	7.812	7.708	7.916	0.104
Nitrobenzene	10.633	10.675	10.667	10.692	10.633	10.660	10.556	10.764	0.104
1,3-DNB	15.183	15.258	15.258	15.292	15.175	15.233	14.872	15.594	0.361
2-Nitrotoluene	15.725	15.783	15.767	15.817	15.692	15.757	15.497	16.017	0.260
4-Nitrotoluene	16.225	16.342	16.342	16.375	16.258	16.308	16.018	16.598	0.290
4-AM-2,6-DNT	16.950	17.108	17.108	17.150	17.000	17.063	16.500	17.626	0.563
3-Nitrotoluene	17.700	17.800	17.775	17.825	17.700	17.760	17.393	18.127	0.367
2-AM-4,6-DNT	18.925	19.125	19.125	19.175	19.025	19.075	18.317	19.833	0.758
1,3,5-TNB	20.142	20.267	20.267	20.317	20.200	20.239	19.626	20.852	0.613
2,6-DNT	21.517	21.642	21.650	21.683	21.558	21.610	20.886	22.334	0.724
2,4-DNT	22.733	22.825	22.892	22.942	22.800	22.838	22.041	23.635	0.797
Tetryl	31.667	31.808	31.850	31.875	31.617	31.763	30.113	33.413	1.650
2,4,6-TNT	33.233	33.367	33.358	33.375	33.150	33.297	31.954	34.640	1.343
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SURROGATE	1.0X	5.0X	10.0X	20.0X	40.0X	RT	FROM	TO	WIDTH
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	18.492	18.650	18.600	18.675	18.525	18.588	18.055	19.121	0.533

EX17H17C.MET

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8/20/04
6026

00091419

DAILY CALIBRATION

6027

CONTINUE CALIBRATION
METHOD 8330

00091420

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL20003A 12/20/2004 17:58
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.292	4.242	4.342	400.0	70.800	28461	402.03	1		15
RDX	6.300	6.162	6.438	400.0	89.500	35641	398.02	-0		15
1,3,5-TNB	8.500	8.347	8.653	400.0	209.100	83199	397.84	-1		15
1,3-DNB	10.250	10.021	10.479	400.0	289.800	115929	400.05	0		15
Tetryl	11.000	10.712	11.288	400.0	169.900	68123	400.86	0		15
Nitrobenzene	11.792	11.391	12.193	400.0	200.000	80732	403.60	1		15
2,4,6-TNT	13.300	12.899	13.701	400.0	204.900	80648	393.51	-2		15
4-AM-2,6-DNT	13.875	13.370	14.380	400.0	148.100	60372	407.78	2		15
2-AM-4,6-DNT	14.408	13.860	14.956	400.0	215.500	86596	401.82	0		15
2,6-DNT	15.358	14.895	15.821	400.0	136.100	55446	407.37	2		15
2,4-DNT	15.908	15.431	16.385	400.0	275.800	111329	403.63	1		15
2-Nitrotoluene	18.875	18.284	19.466	400.0	128.700	51626	401.15	0		15
4-Nitrotoluene	20.425	19.768	21.082	400.0	106.900	45124	422.27	6		15
3-Nitrotoluene	21.842	21.090	22.594	400.0	136.100	57301	420.92	5		15
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.517	12.142	12.892	400.0	123.300	50724	411.28	3		15

6028

CONTINUE CALIBRATION
METHOD 8330

00091421

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL20015A 12/20/2004 23:44
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.333	4.283	4.383	400.0	70.800	29272	413.49	3		15
RDX	6.408	6.270	6.546	400.0	89.500	38105	425.54	6		15
1,3,5-TNB	8.642	8.489	8.795	400.0	209.100	85122	407.03	2		15
1,3-DNB	10.467	10.238	10.696	400.0	289.800	119721	413.14	3		15
Tetryl	11.275	10.987	11.563	400.0	169.900	69968	411.72	3		15
Nitrobenzene	12.042	11.641	12.443	400.0	200.000	82996	414.92	4		15
2,4,6-TNT	13.592	13.191	13.993	400.0	204.900	84236	411.02	3		15
4-AM-2,6-DNT	14.333	13.828	14.838	400.0	148.100	61879	417.96	4		15
2-AM-4,6-DNT	14.875	14.327	15.423	400.0	215.500	87276	404.97	1		15
2,6-DNT	15.750	15.287	16.213	400.0	136.100	57777	424.50	6		15
2,4-DNT	16.325	15.848	16.802	400.0	275.800	113421	411.21	3		15
2-Nitrotoluene	19.358	18.767	19.949	400.0	128.700	52495	407.90	2		15
4-Nitrotoluene	20.983	20.326	21.640	400.0	106.900	46819	438.13	10		15
3-Nitrotoluene	22.450	21.698	23.202	400.0	136.100	57711	423.93	6		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.850	12.475	13.225	400.0	123.300	51463	417.27	4		15

CONTINUE CALIBRATION
METHOD 8330

00091422

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL21002A 12/21/2004 12:17
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.308	4.258	4.358	400.0	70.800	28235	398.84	-0		15
RDX	6.342	6.204	6.480	400.0	89.500	36063	402.74	1		15
1,3,5-TNB	8.550	8.397	8.703	400.0	209.100	82108	392.62	-2		15
1,3-DNB	10.325	10.096	10.554	400.0	289.800	115534	398.69	-0		15
Tetryl	11.108	10.820	11.396	400.0	169.900	67938	399.77	-0		15
Nitrobenzene	11.875	11.474	12.276	400.0	200.000	79947	399.67	-0		15
2,4,6-TNT	13.400	12.999	13.801	400.0	204.900	80421	392.40	-2		15
4-AM-2,6-DNT	14.033	13.528	14.538	400.0	148.100	59823	404.07	1		15
2-AM-4,6-DNT	14.558	14.010	15.106	400.0	215.500	84462	391.91	-2		15
2,6-DNT	15.492	15.029	15.955	400.0	136.100	54767	402.38	1		15
2,4-DNT	16.033	15.556	16.510	400.0	275.800	110265	399.77	-0		15
2-Nitrotoluene	19.008	18.417	19.599	400.0	128.700	51046	396.64	-1		15
4-Nitrotoluene	20.592	19.935	21.249	400.0	106.900	45322	424.12	6		15
3-Nitrotoluene	22.008	21.256	22.760	400.0	136.100	56862	417.70	4		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.633	12.258	13.008	400.0	123.300	49767	403.52	1		15

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CONTINUE CALIBRATION
METHOD 8330

00091423

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL21012A 12/21/2004 17:05
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.300	4.250	4.350	400.0	70.800	28637	404.52	1		15
RDX	6.325	6.187	6.463	400.0	89.500	35492	396.36	-1		15
1,3,5-TNB	8.525	8.372	8.678	400.0	209.100	83787	400.65	0		15
1,3-DNB	10.283	10.054	10.512	400.0	289.800	116602	402.37	1		15
Tetryl	11.033	10.745	11.321	400.0	169.900	68756	404.58	1		15
Nitrobenzene	11.833	11.432	12.234	400.0	200.000	81307	406.47	2		15
2,4,6-TNT	13.350	12.949	13.751	400.0	204.900	80995	395.20	-1		15
4-AM-2,6-DNT	13.925	13.420	14.430	400.0	148.100	61989	418.70	5		15
2-AM-4,6-DNT	14.442	13.894	14.990	400.0	215.500	85780	398.03	-0		15
2,6-DNT	15.417	14.954	15.880	400.0	136.100	55335	406.56	2		15
2,4-DNT	15.950	15.473	16.427	400.0	275.800	111179	403.09	1		15
2-Nitrotoluene	18.933	18.342	19.524	400.0	128.700	51488	400.08	0		15
4-Nitrotoluene	20.508	19.851	21.165	400.0	106.900	44634	417.68	4		15
3-Nitrotoluene	21.917	21.165	22.669	400.0	136.100	57110	419.52	5		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.575	12.200	12.950	400.0	123.300	51157	414.79	4		15

6031

CONTINUE CALIBRATION
METHOD 8330

00091424

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL21021A 12/21/2004 21:25
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.333	4.283	4.383	400.0	70.800	29529	417.12	4		15
RDX	6.408	6.270	6.546	400.0	89.500	36651	409.30	2		15
1,3,5-TNB	8.642	8.489	8.795	400.0	209.100	83931	401.34	0		15
1,3-DNB	10.458	10.229	10.687	400.0	289.800	118138	407.67	2		15
Tetryl	11.258	10.970	11.546	400.0	169.900	68631	403.85	1		15
Nitrobenzene	12.033	11.632	12.434	400.0	200.000	81515	407.51	2		15
2,4,6-TNT	13.583	13.182	13.984	400.0	204.900	82418	402.15	1		15
4-AM-2,6-DNT	14.300	13.795	14.805	400.0	148.100	60872	411.15	3		15
2-AM-4,6-DNT	14.850	14.302	15.398	400.0	215.500	85539	396.91	-1		15
2,6-DNT	15.733	15.270	16.196	400.0	136.100	56026	411.63	3		15
2,4-DNT	16.308	15.831	16.785	400.0	275.800	111103	402.81	1		15
2-Nitrotoluene	19.342	18.751	19.933	400.0	128.700	52850	410.66	3		15
4-Nitrotoluene	20.992	20.335	21.649	400.0	106.900	43058	402.94	1		15
3-Nitrotoluene	22.442	21.690	23.194	400.0	136.100	56680	416.36	4		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.833	12.458	13.208	400.0	123.300	50526	409.68	2		15

6032

CONTINUE CALIBRATION
METHOD 8330

00091425

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL21030A 12/22/2004 01:44
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.358	4.308	4.408	400.0	70.800	28761	406.27	2		15
RDX	6.475	6.337	6.613	400.0	89.500	36851	411.54	3		15
1,3,5-TNB	8.717	8.564	8.870	400.0	209.100	85213	407.47	2		15
1,3-DNB	10.583	10.354	10.812	400.0	289.800	118482	408.86	2		15
Tetryl	11.425	11.137	11.713	400.0	169.900	68419	402.60	1		15
Nitrobenzene	12.183	11.782	12.584	400.0	200.000	82651	413.19	3		15
2,4,6-TNT	13.758	13.357	14.159	400.0	204.900	84235	411.01	3		15
4-AM-2,6-DNT	14.583	14.078	15.088	400.0	148.100	60816	410.78	3		15
2-AM-4,6-DNT	15.158	14.610	15.706	400.0	215.500	86030	399.19	-0		15
2,6-DNT	15.992	15.529	16.455	400.0	136.100	57301	421.00	5		15
2,4-DNT	16.567	16.090	17.044	400.0	275.800	111937	405.83	1		15
2-Nitrotoluene	19.650	19.059	20.241	400.0	128.700	51783	402.37	1		15
4-Nitrotoluene	21.333	20.676	21.990	400.0	106.900	44795	419.19	5		15
3-Nitrotoluene	22.808	22.056	23.560	400.0	136.100	55798	409.88	2		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	13.025	12.650	13.400	400.0	123.300	50569	410.02	3		15

6033

CONTINUE CALIBRATION
METHOD 8330

00091426

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL21042A 12/22/2004 07:30
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.367	4.317	4.417	400.0	70.800	28930	408.65	2		15
RDX	6.500	6.362	6.638	400.0	89.500	36558	408.26	2		15
1,3,5-TNB	8.758	8.605	8.911	400.0	209.100	85438	408.55	2		15
1,3-DNB	10.633	10.404	10.862	400.0	289.800	118329	408.33	2		15
Tetryl	11.492	11.204	11.780	400.0	169.900	68305	401.93	0		15
Nitrobenzene	12.242	11.841	12.643	400.0	200.000	81988	409.88	2		15
2,4,6-TNT	13.825	13.424	14.226	400.0	204.900	83467	407.27	2		15
4-AM-2,6-DNT	14.692	14.187	15.197	400.0	148.100	60261	407.03	2		15
2-AM-4,6-DNT	15.267	14.719	15.815	400.0	215.500	85239	395.52	-1		15
2,6-DNT	16.083	15.620	16.546	400.0	136.100	56754	416.98	4		15
2,4-DNT	16.675	16.198	17.152	400.0	275.800	110980	402.36	1		15
2-Nitrotoluene	19.758	19.167	20.349	400.0	128.700	52534	408.21	2		15
4-Nitrotoluene	21.458	20.801	22.115	400.0	106.900	44762	418.88	5		15
3-Nitrotoluene	22.925	22.173	23.677	400.0	136.100	55440	407.25	2		15
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	13.108	12.733	13.483	400.0	123.300	50300	407.84	2		15

6034

CONTINUE CALIBRATION
METHOD 8330

00091427

Lab Name : EMAX
Instrument ID : HPLC1 81
GC Column : VARIAN C18
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: XJ19014A 10/19/2004 18:10
Conc Cont LFID & Datetime: XL21049A 12/22/2004 10:52
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO		TRUE CONC	AVERAGE CF	RESULT AREA CONC		%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	4.342	4.292	4.392	400.0	70.800	28491	402.45	1		15
RDX	6.433	6.295	6.571	400.0	89.500	35789	399.68	-0		15
1,3,5-TNB	8.675	8.522	8.828	400.0	209.100	82418	394.10	-1		15
1,3-DNB	10.517	10.288	10.746	400.0	289.800	115799	399.60	-0		15
Tetryl	11.333	11.045	11.621	400.0	169.900	66936	393.88	-2		15
Nitrobenzene	12.108	11.707	12.509	400.0	200.000	81062	405.25	1		15
2,4,6-TNT	13.667	13.266	14.068	400.0	204.900	82012	400.17	0		15
4-AM-2,6-DNT	14.433	13.928	14.938	400.0	148.100	60592	409.26	2		15
2-AM-4,6-DNT	14.983	14.435	15.531	400.0	215.500	85034	394.57	-1		15
2,6-DNT	15.867	15.404	16.330	400.0	136.100	56030	411.66	3		15
2,4-DNT	16.433	15.956	16.910	400.0	275.800	110610	401.02	0		15
2-Nitrotoluene	19.500	18.909	20.091	400.0	128.700	51773	402.29	1		15
4-Nitrotoluene	21.158	20.501	21.815	400.0	106.900	43310	405.30	1		15
3-Nitrotoluene	22.617	21.865	23.369	400.0	136.100	54824	402.73	1		15
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-Dinitrotoluene	12.933	12.558	13.308	400.0	123.300	50308	407.91	2		15

6035

CONTINUE CALIBRATION
METHOD 8330

00091428

Lab Name : EMAX
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: PH17005A 08/17/2004 14:58
Conc Cont LFID & Datetime: PL21002A 12/21/2004 14:29
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW FROM TO	TRUE CONC	AVERAGE CF	RESULT AREA CONC	%D	QL	%D LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.125	6.045 6.205	400.0	245.000	97335 397.31	-1		15
RDX	7.933	7.829 8.037	400.0	268.600	100692 374.81	-6		15
Nitrobenzene	10.725	10.621 10.829	400.0	338.000	131155 388.04	-3		15
1,3-DNB	15.442	15.081 15.803	400.0	515.000	191677 372.17	-7		15
2-Nitrotoluene	15.850	15.590 16.110	400.0	273.500	107744 394.00	-2		15
4-Nitrotoluene	16.450	16.160 16.740	400.0	284.900	117212 411.46	3		15
4-AM-2,6-DNT	17.433	16.870 17.996	400.0	261.800	89732 342.78	-14		15
3-Nitrotoluene	17.883	17.516 18.250	400.0	352.500	145090 411.58	3		15
2-AM-4,6-DNT	19.600	18.842 20.358	400.0	421.400	157332 373.37	-7		15
1,3,5-TNB	20.467	19.854 21.080	400.0	355.300	135909 382.52	-4		15
2,6-DNT	21.867	21.143 22.591	400.0	255.700	96515 377.50	-6		15
2,4-DNT	23.225	22.428 24.022	400.0	498.400	200257 401.77	0		15
Tetryl	32.650	31.000 34.300	400.0	524.000	188547 359.79	-10		15
2,4,6-TNT	33.833	32.490 35.176	400.0	517.700	227459 439.38	10		15
-----	-----	-----	-----	-----	-----	-----	-----	-----
SURROGATE	MINUTES	FROM TO	TRUECON	CF	AREA CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	18.908	18.375 19.441	400.0	256.000	92885 362.77	-9		15

6036

CONTINUE CALIBRATION
METHOD 8330

00091429

Lab Name : EMAX
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: PH17005A 08/17/2004 14:58
Conc Cont LFID & Datetime: PL21013A 12/21/2004 22:06
CONC UNIT : ppb

COMPOUND	RT	RT WINDOW		TRUE CONC	AVERAGE CF	RESULT		%D	QL	%D LIMITS
	MINUTES	FROM	TO			AREA	CONC			
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.200	6.120	6.280	400.0	245.000	97276	397.07	-1		15
RDX	8.042	7.938	8.146	400.0	268.600	100724	374.93	-6		15
Nitrobenzene	10.883	10.779	10.987	400.0	338.000	129845	384.17	-4		15
1,3-DNB	15.733	15.372	16.094	400.0	515.000	200479	389.26	-3		15
2-Nitrotoluene	16.150	15.890	16.410	400.0	273.500	105320	385.14	-4		15
4-Nitrotoluene	16.767	16.477	17.057	400.0	284.900	119340	418.93	5		15
4-AM-2,6-DNT	18.058	17.495	18.621	400.0	261.800	93293	356.38	-11		15
3-Nitrotoluene	18.250	17.883	18.617	400.0	352.500	142248	403.51	1		15
2-AM-4,6-DNT	20.108	19.350	20.866	400.0	421.400	160422	380.70	-5		15
1,3,5-TNB	20.933	20.320	21.546	400.0	355.300	139700	393.19	-2		15
2,6-DNT	22.450	21.726	23.174	400.0	255.700	98773	386.33	-3		15
2,4-DNT	23.783	22.986	24.580	400.0	498.400	207335	415.97	4		15
Tetryl	33.750	32.100	35.400	400.0	524.000	184486	352.04	-12		15
2,4,6-TNT	34.808	33.465	36.151	400.0	517.700	238090	459.92	15		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	19.358	18.825	19.891	400.0	256.000	93389	364.74	-9		15

6037

CONTINUE CALIBRATION
METHOD 8330

00091430

Lab Name : EMAX
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: PH17005A 08/17/2004 14:58
Conc Cont LFID & Datetime: PL22002A 12/22/2004 15:43
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW		TRUE CONC	AVERAGE CF	RESULT		%D	QL	%D LIMITS
		FROM	TO			AREA	CONC			
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.175	6.095	6.255	400.0	245.000	95772	390.93	-2		15
RDX	8.017	7.913	8.121	400.0	268.600	99646	370.92	-7		15
Nitrobenzene	10.892	10.788	10.996	400.0	338.000	128837	381.18	-5		15
1,3-DNB	15.633	15.272	15.994	400.0	515.000	190465	369.82	-8		15
2-Nitrotoluene	16.175	15.915	16.435	400.0	273.500	111705	408.48	2		15
4-Nitrotoluene	16.767	16.477	17.057	400.0	284.900	115471	405.35	1		15
4-AM-2,6-DNT	17.750	17.187	18.313	400.0	261.800	90500	345.71	-14		15
3-Nitrotoluene	18.275	17.908	18.642	400.0	352.500	135227	383.60	-4		15
2-AM-4,6-DNT	19.900	19.142	20.658	400.0	421.400	151825	360.30	-10		15
1,3,5-TNB	20.792	20.179	21.405	400.0	355.300	132191	372.05	-7		15
2,6-DNT	22.325	21.601	23.049	400.0	255.700	86134	336.90	-16	*	15
2,4-DNT	23.658	22.861	24.455	400.0	498.400	190779	382.76	-4		15
Tetryl	33.350	31.700	35.000	400.0	524.000	174767	333.50	-17	*	15
2,4,6-TNT	34.542	33.199	35.885	400.0	517.700	213536	412.49	3		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	19.300	18.767	19.833	400.0	256.000	88006	343.71	-14		15

6038

CONTINUE CALIBRATION
METHOD 8330

00091431

Lab Name : EMAX
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: PH17005A 08/17/2004 14:58
Conc Cont LFID & Datetime: PL22006A 12/22/2004 18:29
CONC UNIT : ppb

COMPOUND	RT MINUTES	RT WINDOW		TRUE CONC	AVERAGE CF	RESULT		%D	QL	%D LIMITS
		FROM	TO			AREA	CONC			
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.225	6.145	6.305	400.0	245.000	97161	396.60	-1		15
RDX	8.092	7.988	8.196	400.0	268.600	100361	373.58	-7		15
Nitrobenzene	11.017	10.913	11.121	400.0	338.000	128104	379.02	-5		15
1,3-DNB	15.883	15.522	16.244	400.0	515.000	189798	368.52	-8		15
2-Nitrotoluene	16.475	16.215	16.735	400.0	273.500	114963	420.40	5		15
4-Nitrotoluene	17.075	16.785	17.365	400.0	284.900	119765	420.42	5		15
4-AM-2,6-DNT	18.100	17.537	18.663	400.0	261.800	92040	351.59	-12		15
3-Nitrotoluene	18.608	18.241	18.975	400.0	352.500	147422	418.19	5		15
2-AM-4,6-DNT	20.267	19.509	21.025	400.0	421.400	161108	382.33	-4		15
1,3,5-TNB	21.125	20.512	21.738	400.0	355.300	151046	425.12	6		15
2,6-DNT	22.783	22.059	23.507	400.0	255.700	103374	404.33	1		15
2,4-DNT	24.117	23.320	24.914	400.0	498.400	216051	433.46	8		15
Tetryl	34.217	32.567	35.867	400.0	524.000	182304	347.88	-13		15
2,4,6-TNT	35.317	33.974	36.660	400.0	517.700	230791	445.82	11		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	19.675	19.142	20.208	400.0	256.000	94001	367.13	-8		15

6039

CONTINUE CALIBRATION
METHOD 8330

00091432

Lab Name : EMAX
Instrument ID : HPLC1 LCT001(T017)
GC Column : LUNA 5U PHENYL-HEXYL
Column size ID : 25CMX4.6MM
Mid Conc Init LFID & Datetime: PH17005A 08/17/2004 14:58
Conc Cont LFID & Datetime: PL22011A 12/22/2004 21:57
CONC UNIT : ppb

COMPOUND	RT	RT WINDOW		TRUE	AVERAGE	RESULT		%D	QL	%D LIMITS
	MINUTES	FROM	TO	CONC	CF	AREA	CONC			
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
HMX	6.383	6.303	6.463	400.0	245.000	95304	389.02	-3		15
RDX	8.333	8.229	8.437	400.0	268.600	100187	372.93	-7		15
Nitrobenzene	11.367	11.263	11.471	400.0	338.000	127211	376.37	-6		15
1,3-DNB	16.417	16.056	16.778	400.0	515.000	197822	384.10	-4		15
2-Nitrotoluene	17.108	16.848	17.368	400.0	273.500	116858	427.33	7		15
4-Nitrotoluene	17.733	17.443	18.023	400.0	284.900	124307	436.37	9		15
4-AM-2,6-DNT	19.108	18.545	19.671	400.0	261.800	93341	356.56	-11		15
3-Nitrotoluene	19.333	18.966	19.700	400.0	352.500	147476	418.34	5		15
2-AM-4,6-DNT	21.242	20.484	22.000	400.0	421.400	157406	373.55	-7		15
1,3,5-TNB	21.908	21.295	22.521	400.0	355.300	139111	391.53	-2		15
2,6-DNT	23.833	23.109	24.557	400.0	255.700	85445	334.20	-16	*	15
2,4-DNT	25.183	24.386	25.980	400.0	498.400	176112	353.33	-12		15
Tetryl	36.167	34.517	37.817	400.0	524.000	173263	330.63	-17	*	15
2,4,6-TNT	37.000	35.657	38.343	400.0	517.700	176240	340.44	-15		15
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SURROGATE	MINUTES	FROM	TO	TRUECON	CF	AREA	CONC	%D	QL	LIMITS
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
3,4-DNT	20.567	20.034	21.100	400.0	256.000	94695	369.84	-8		15

6040

00091433

ANALYTICAL LOGS

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ANALYSIS RUN LOG FOR HPLC

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0 ☐

Book # A17-010

Starting Date: 8/17/04 Time: 12:11 Ending Date: 8/17/04 Time: 23:58

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number		17
				S	W				
	PH17.001	IB17H658					Initial Calibration		
	2	EX17H17C-01 20				Not evaluated	Date	08/17/04	
	3	02 100				8330 C Ical Phenyl-hexyl column	met.	EX17H17C	
	4	03 200					m.p	PH17005A	
	5	04 400					Standards		
	6	05 800					Name	ID	Conc. (µg/L)
	7	01 20				DCC ID	SHIC-03-47-2	400	
	8	IEX17H17C-01 400				Ical stock	XP 8/17/04 8330 SH1B-03-36-3	1600	
EXH001S	9	04G156-18T	5			Ical	SHIC-03-53-1	400	
	10	18DT	5			Solvent ID			
	11	18	1			Methanol	43206332		
	12	18D	1			Water	43189		
EXH002W	13	04G092-24T	10			Acetonitrile			
	14	24DT	↓			Electronic Data Archival			
	15	24	1			Location		Date	
	16	24D	↓			Comments: samples disposed off 8/18/04			
	17	IB				Analyzed By: XP			
	18	CEX17H17C658				This page is checked during the data review process.			

ANALYSIS RUN LOG FOR HPLC

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0 ☐

Book # A81-02-005

Starting Date: 10/19/04

Time: 16:45 11:27

Ending Date: 10/19/04

Time: 20:05

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number		81
				(W)	(S)				
	XJ19.001	TEST					INITIAL CALIBRATION REFERENCE		
	2						Date	10/19/04	
	3						Method	EX81J19	
	4						Mid Point	XJ19014A (4/5)	
	5						ICAL ID	SH18-03-40-3 (800ppb)	
	6						ICV ID	SH18-03-36-2 (10ppm)	
	7						DCC ID		
	8								
	9								
	10	IB81J614							
NA	11	EX81J1901 20				} Not evaluated } RT shifted			
	12	02 100							
	13	03 200				} 8330 Ical (Primary col.)	Solvents ID		
	14	04 400					Acetonitrile		
	15	05 800				Methanol	43206332		
	16	01 20				Water	43189		
	17	02 100					Electronic Data Archival		
	18	EX81J1901 400					Location	Date	
							<input type="checkbox"/> EZC_5_HPLC		
							<input type="checkbox"/>		
							Comments: Samples disposed off 10/20/04		
							Analyzed By: xp.		
							This page is checked during the data review process.		

ANALYTICAL BATCH

NA

EMAX LABORATORIES, INC. 1835 W. 20TH ST. TORRANCE, CA 90501

6043

XP 10/19/04

00091436

ANALYSIS RUN LOG FOR HPLC

Book # A81-02-005

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0 ☐

Starting Date: 12/20/04 Time: 17100 Ending Date: 12/20/04 Time: 23144

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number		81
				(W)	(S)				
	XP12/20/04 XE XL20.001	TEST					INITIAL CALIBRATION REFERENCE		
	2	EB812664					Date	10/19/04	
	3	CEX81J19664				800	Method	EXE1J19	
EXL004W	4	EXL004WB	✓	✓			Mid Point	XJ19074A (4/5)	
	5	L					ICAL ID	-	
	6	C					ICV ID	-	
	7	04L128-11				E	DCC ID	SHIC-03-54-2	
	8	12							
	9	04L142-07				E			
	10	04L145-01	✓	✓		Sat.			
	11	Range							
EXL004W	12	04L145-02	✓	✓		Sat.			
	13	Range					Solvents ID		
	14	↓					Acetonitrile	-	
	15	CEX81J19665				800	Methanol	43206332	
							Water	44168	
							Electronic Data Archival		
							Location		Date
							<input type="checkbox"/> E2C_5_HPLC		
							<input type="checkbox"/>		
							Comments: samples disposed off		
							12/21/04		
							Analyzed By: XP		

ANALYTICAL BATCH XL20003A

F MAX LABORATORIES, INC. 1235 W. 20th St. Torrance, CA 90501

6044

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ANALYSIS RUN LOG FOR HPLC

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0 ☐

Book # A81-02-005

Starting Date:

12/21/04

Time:

11:48

Ending Date:

12/22/04

Time:

01:44

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number		81
				(W)	(S)				
	XL21.001	IB 81L666					INITIAL CALIBRATION REFERENCE		
	2	CEX81T19666				800	Date	10/19/04	
EXL004W	3	04L128-11I	50	✓			Method	EX81T19	
	4	↓ 11T	5				Mid Point	XJ19014 A (4/5)	
	5	04L145-01I	500				ICAL ID	—	
	6	↓ 01T	20				ICV ID	—	
	7	↓ 02I	500				DCC ID	SHIC-03-54-2	
	8	↓ 02T	20						
	9	04L142-07I	100						
	10	↓ 07T	10	↓					
	11	IB							
	12	CEX81T19667				800			
EXL005S	13	EXL005SA	1		✓		Solvents ID		
	14	↓ L					Acetonitrile	—	
	15	04L128-01					Methanol	43206332	
	16	↓ 02					Water	44168	
	17	02M					Electronic Data Archival		
	18	02S					Location		Date
	19	↓ 03	↓		↓		<input type="checkbox"/> E2C_5_HPLC		
	20	IB					<input type="checkbox"/>		
	21	CEX81T19668				800	Comments:	Samples disposed off 12/22/04	
EXL005S	22	04L128-04	1		✓				
	23	↓ 05							
	24	↓ 06							
	25	↓ 07							
	26	↓ 08							
	27	↓ 09							
	28	↓ 10	↓		↓		Analyzed By:	XP	
	29	Rm3E							
	30	CEX81T19669				800			

ANALYTICAL BATCH XL21002A

EMAX LABORATORIES, INC. 1835 W. 20th St. Torrance, CA 90501

6045

ANALYSIS RUN LOG FOR HPLC

00091438¹

Book # A81-02-005

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0 ☐

Starting Date: 12/22/04

Time: 02:13

Ending Date: 12/21/04

Time: 10:52

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number	
				(W)	(S)		81	
EXL0055	XL21.031	XP 12/21/04 041# 04L142-01	1		✓		INITIAL CALIBRATION REFERENCE	
	32	02	↓		↓		Date	10/19/04
	33	03 I	100		✓		Method	EX81T19
	34	03 T	10				Mid Point	XT19014 A (4/5)
	35	04 I	100				ICAL ID	—
	36	04 T	10				ICV ID	✓
	37	05 I	100				DCC ID	SHIC-03-54-2
	38	05 T	10					
	39	06 I	100					
	40	06 T	10		↓			
	41	IB						
	42	CEX81T19670				800		
EXL0055	43	04L142-03					Solvents ID	
	44	Range					Acetonitrile	—
EXL0055	45	04L142-04	1		✓		Methanol	43206332
	46	05	1		↓		Water	44168
	47	06 I	1000				Electronic Data Archival	
	48	06 T	5000		↓		Location	Date
	49	CEX81T19671				800	<input type="checkbox"/> EZC_5_HPLC	
							<input type="checkbox"/>	
							Comments: Samples disposed off 12/22/04	
Analyzed By: XP							This page is checked during the data review process.	

ANALYTICAL BATCH XL21002A

EMAX LABORATORIES, INC. 1835 W. 30th St. Torrance, CA 90501

6046

ANALYSIS RUN LOG FOR HPLC

SOP ☒ EMAX-8330 Rev. No: 2 ☐ EMAX-8310 Rev. No: 4 ☐ EMAX-8332 Rev. No: 0

Book # A17-010

Starting Date: 12/21/04 Time: 13:47 Ending Date: 12/21/04 Time: 22:06

Preparation Batch	Data File Name	Lab Sample ID	DF	Matrix		Notes	Instrument Number	
				S	W			17
	PL21.001	IB17L694					Initial Calibration	
	2	CEX17H17C694				800.	Date	08/17/04
EXL004W	3	04L128-11T	5		✓	hump. RR	met.	EX17H17C
	4	↓ 11T	↓				m.p	PH17005A (4/5)
	5	↓ 12	1				Standards	
	6	04L145-01T	20				Name	ID
	7	01	1					Conc. (µg/L)
	8	02T	20				DCC ID	8HIC-03-54-2
	9	01	1					XP 12/21/04 80 400
	10	04L142-07T	10					
	11	↓ 07	1					
EXL005S	12	04L128-01	1	✓				
	13	CEX17H17C695				800	Solvent ID	
							Methanol	43206332
							Water	44168
							Acetonitrile	—
							Electronic Data Archival	
							Location	Date
							Comments: samples disposed off 12/22/04	
							Analyzed By: KP	

This page is checked during the data review process.

