Former Lockheed Martin French Road Facility Utica, New York Solvent Dock Area NYSDEC Site #6-20080321-5

First Quarter 2015 Corrective Action Progress Report



Prepared for:

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Table of Contents

PURPOSE1		
1.0	SUMMARY OF WORK COMPLETED DURING THE REPORTING PERIOD	1
2.0	SUMMARY OF FINDINGS MADE DURING THE REPORTING PERIOD	3
3.0	SUMMARY OF CHANGES MADE DURING THE REPORTING PERIOD	3
4.0	SUMMARY OF CONTACTS MADE WITH REPRESENTATIVES OF THE LOCAL COMMUNITY AND PUBLIC INTEREST GROUPS DURING THE REPORTING PERIOD	3
5.0	SUMMARY OF PROBLEMS ENCOUNTERED DURING THE REPORTING PERIOD	3
6.0	CHANGES IN PERSONNEL CONDUCTING OR MANAGING THE CORRECTIVE MEASURES DURING THE REPORTING PERIOD	4
7.0	SUMMARY OF WORK PLANNED FOR THE NEXT REPORTING PERIOD	4

ACRONYMS

DOW Division of Water

GAC granular activated carbon

GCTS groundwater collection and treatment system

ICM interim corrective measure

NYSDEC New York State Department of Environmental Conservation

NYSDOH New York State Department of Health
OM&M operation, monitoring and maintenance
SPDES State Pollutant Discharge Elimination System

sub-slab depressurization system

VI vapor intrusion



Purpose

On behalf of Lockheed Martin Corporation (Lockheed Martin), Stantec Consulting Services Inc. (Stantec) has prepared this *First Quarter 2015 Corrective Action Progress Report* for the Solvent Dock Area at the former Lockheed Martin French Road facility in Utica, New York (the Site). This report is required by the October 3, 2008 New York State Department of Environmental Conservation (NYSDEC) Order on Consent (the Order; CO 6-20080321-5), and in Attachment 3-1 (Corrective Action Requirements), Section B.8, of the Order. The following sections summarize activities and information for the First Quarter (January, February and March) of 2015.

1.0 Summary of Work Completed During the Reporting Period

The following activities were completed during the reporting period:

- Obtained monthly samples of effluent water from the groundwater collection and treatment system (GCTS) for compliance with the existing State Pollutant Discharge Elimination System (SPDES) permit (NY-012-1894). Results were documented in monthly Discharge Monitoring Reports submitted to NYSDEC.
- Performed ongoing operation, monitoring and maintenance (OM&M) of the interim corrective measure (ICM) for groundwater (i.e., the GCTS).
- Performed ongoing OM&M of the ICM for sub-slab soil gas (i.e., the sub-slab depressurization system, or SSDS).
- Performed the field sampling for the 2015 Vapor Intrusion (VI) study during January 14-16, 2015 (note: at the direction of NYSDEC, the sampling was repeated during the period March 24-26 – see further discussion below).
- Submitted the Fourth Quarter 2014 Corrective Action Progress Report to NYSDEC and New York State Department of Health (NYSDOH) on January 21, 2015 and added the document to the public repository at the Utica Library.
- Submitted to NYSDEC on February 12, 2015 a letter providing comments on the NYSDEC's
 Draft Statement of Basis for Proposed Remedy, Former Lockheed Martin French Road Facility, which was issued in December 2014.
- Discharged water collected from ConMed's emergency valve repair excavation that had been temporarily stored in a frac tank to the GCTS on February 4, 2015, in accordance with conditions of the SPDES permit. The discharge and treatment was approved in advance by the NYSDEC Region 6 Division of Water (DOW). Sediment from this frac tank (and a previous tank discharged in Q4 2014) was placed in drums and sampled for waste characterization analyses. Offsite disposal is pending.
- Submitted a letter to NYSDEC Region 6 DOW on February 10, 2015 summarizing details of two instances (November 17, 2014 and February 6, 2015) of excavation water discharge from frac tanks to the GCTS. The water had been containerized during ConMed's emergency fire protection valve repairs.

- Conducted monthly project update conference calls with NYSDEC (R. Curley) on February 12 and March 12, 2015 (no call was held in January).
- Submitted to NYSDEC on February 13, 2015 the 2014 Annual Groundwater Monitoring Report, Former Lockheed Martin French Road Facility, Utica, New York.
- Completed first quarter 2015 groundwater sampling during the period January 12-14, 2015 in accordance with the *Interim Groundwater Monitoring Program*, and submitted related monitoring data to NYSDEC and NYSDOH on February 26, 2015.
- Submitted to NYSDEC on March 4, 2015 the 2014 Annual Groundwater Collection and Treatment System Operation, Maintenance and Monitoring Report, Former Lockheed Martin French Road Facility, Utica New York. This submittal also included an electronic copy of the GCTS Operation Maintenance and Monitoring Manual, which was updated in October 2014.
- Conducted on March 6, 2015 a teleconference with NYSDEC (R. Curley) to discuss preliminary findings of the 2015 Annual VI Study, in light of samples obtained and analyzed independently by ConMed. The two sample sets identified different constituent levels at selected indoor air locations.
- NYSDEC provided Lockheed Martin on March 6, 2015 a directive to repeat the VI sampling event prior to the close of the heating season (March 31). The directive further required that sampling cannisters be individually certified by the laboratory.
- Submitted to NYSDEC on March 11, 2015 the 2014 Annual Sub-Slab Depressurization System Operation, Maintenance and Monitoring Report, Former Lockheed Martin French Road Facility, Utica New York. This submittal also included an electronic copy of the SSDS Operation Maintenance and Monitoring Manual, which was updated in October 2014.
- Submitted on March 12, 2015 the 2014 Groundwater Monitoring Report, Former Lockheed Martin French Road Facility, West Lot – NYSDEC Site ID #633036. The report was submitted to NYSDEC Region 6 (P. Ouderkirk).
- Submitted to NYSDEC (Region 6 DOW) on March 23, 2015 a letter requesting modification to the existing SPDES permit. The submittal was provided in response to a directive from NYSDEC in 2012; a previous submittal in 2012 by Lockheed Martin responding to that directive was never processed. The recent submittal included updated site information and results of previously-performed Whole Effluent Toxicity testing.
- Obtained on March 23, 2015 a sample for waste characterization analysis of the granular activated carbon (GAC) for the SSDS, in preparation for carbon change out in Quarter 2.
- Received from NYSDEC Region 6 DOW on March 30, 2015 a letter indicating the SPDES modification submittal identified above had been forwarded to NYSDEC DOW in Albany for processing.
- NYSDEC issued the Final Statement of Basis for Proposed Remedy, Former Lockheed
 Martin-French Road Facility, Operable Units 01 and 02, Site No. 633036A, EPA ID No. NYD

000521971, Utica, Oneida County, on March 30, 2015. The document incorporated comments received during the public comment period.

2.0 Summary of Findings Made During the Reporting Period

The following findings were made during the reporting period:

- The 2014 Annual Groundwater Monitoring Report concluded that detected constituents (primarily chlorinated VOCs) are not migrating to new areas and are at roughly similar concentrations than those detected historically. Statistical analysis indicates that tetrachloroethene in one well and trichloroethene in another well represent increasing trends over the last eight monitoring events. Impacts to these wells do not pose an imminent risk to human health and the environment. Statistical analysis performed on results of other monitoring wells identified either decreasing or no trends (neither decreasing nor increasing).
- Results of first quarter groundwater monitoring indicate that the detected types and distribution of contaminants are similar to those of previous sampling events.
 Groundwater flow conditions were also similar to previous results and reflect the influence of the GCTS.
- The 2014 Groundwater Monitoring Report, Former Lockheed Martin French Road Facility, West Lot concluded that stable groundwater quality conditions exist in the West Lot portion of the site. Several rounds of data over a five-year period have demonstrated stable conditions with only minor seasonal variation occurring in a limited number of wells, and the downgradient sampling data do not indicate significant offsite migration of VOCs. Closure of the West Lot will be tied to closure of the Solvent Dock portion of the property, and as such, actual West Lot delisting and closure will be deferred until additional remedial measures are completed for the Solvent Dock, and a sitewide Environmental Easement and Site Management Plan (SMP) are developed.

3.0 Summary of Changes Made During the Reporting Period

No significant changes to the *Corrective Measures Implementation Plan* were made during the reporting period.

4.0 Summary of Contacts Made with Representatives of the Local Community and Public Interest Groups During the Reporting Period

- No interaction occurred with local community or public interest groups during the reporting period.
- As referenced in Section 1, the Fourth Quarter 2014 Corrective Action Progress Report was added to the public repository at the Utica Library.

5.0 Summary of Problems Encountered During the Reporting Period

Discrepancies were observed between the January VI indoor air sampling data and indoor air data obtained independently by ConMed; the ConMed results showed lower VOC levels for selected

sampling locations. In response, NYSDEC directed Lockheed Martin to repeat the VI sampling event (sub-slab and indoor air monitoring) in March.

6.0 Changes in Personnel Conducting or Managing the Corrective Measures During the Reporting Period

No personnel changes occurred among those conducting or managing the corrective measures at the Site during the reporting period.

7.0 Summary of Work Planned for the Next Reporting Period

The following activities are scheduled or anticipated for completion during the next reporting period:

- Continue operation and maintenance of the GCTS, including monthly effluent sampling for compliance with the existing SPDES permit and quarterly sampling and monitoring; data to be provided as part of the monthly Discharge Monitoring Reports, and quarterly system OM&M summaries;
- Continue operation and maintenance of the SSDS, including quarterly SSDS sampling and monitoring; data to be provided as part of the quarterly system O&M summaries;
- Continue monthly project status calls with NYSDEC/NYSDOH;
- Complete the 2015 Annual Vapor Intrusion summary report, which will include and discuss data for both sampling events;
- Repair vapor monitoring Point VMP-8D, which had recently not been meeting vacuum performance criteria;
- Dispose of drums of sediment and water from the two frac tanks previously discharged to the GCTS:
- Conduct the second quarter groundwater sampling event for 2015 in accordance with the draft *Interim Groundwater Monitoring Program* and submit a written summary of findings to NYSDEC;
- Submit a summary report to NYSDEC summarizing the management of excavation water generated by ConMed from their emergency excavation performed at location PIV-3 and disposal of related wastes, as required by the Draft Site Management Plan;
- Perform GAC change-out in both the SSDS and GCTS systems;
- Perform rehabilitation and surface repair of selected monitoring wells; and
- Complete procurement and initiate preparation of an initial design investigation work plan for the excavation component of the Statement of Basis Final Corrective Measures.