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

Third Quarter 2015 Corrective Action Progress Report



Prepared for:

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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



FORMER LOCKHEED MARTIN FRENCH ROAD FACILITY UTICA, NEW YORK SOLVENT DOCK AREA

Purpose

On behalf of Lockheed Martin Corporation (Lockheed Martin), Stantec Consulting Services Inc. (Stantec) has prepared this *Third 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 Third Quarter (July, August and September) 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).
- Conducted project update conference calls on August 20, and September 15, 2015 with NYSDEC (S. Saucier) and NYSDOH (S. Karpinski). No call took place in July.
- Submitted to NYSDEC on July 2, 2015, a letter from Lockheed Martin to NYSDEC requesting an extension for submittal of a Draft Environmental Easement package until December 1, 2015.
- Received on July 3, 2015 an email from NYSDEC to Lockheed Martin approving the request for extension of the due date for submittal of the Environmental Easement to December 1, 2015.
- Completed third quarter 2015 groundwater sampling during the period July 6-8, 2015 in accordance with the *Interim Groundwater Monitoring Program*, and submitted related monitoring data to NYSDEC and NYSDOH on August 25, 2015.
- Submitted the Second Quarter 2015 Corrective Action Progress Report to NYSDEC and New York State Department of Health (NYSDOH) on July 7, 2015 and added the document to the public repository at the Utica Library.
- Performed repairs to the GCTS air stripper during the period July 10 through 14, 2015.
- Performed on July 31, 2015 the decommissioning of four exterior soil vapor probes on the Indium Corporation facility located immediately north of the former Lockheed Martin French Road facility.

- Submitted to NYSDEC and NYSDOH on August 24, 2015, a letter report titled Assessment of Potential Soil Vapor Intrusion, Western Portion of Manufacturing Facility, Former Lockheed Martin French Road Facility, 525 French Road, Utica, New York. The report summarized findings of a review of historic information on this portion of the facility and the potential for vapor intrusion to occur.
- Submitted to NYSDEC on August 25, 2015 a document titled Work Plan for Excavation Initial Design Investigation, Former Lockheed Martin French Road Facility, 525 French Road, Utica, New York. The work plan provided details on proposed subsurface investigations in the Former Northern Perimeter Ditch (FNPD) "Area 2" source area, and three locations of where former surface soil samples encountered PCBs at levels exceeding NYSDEC's commercial soil cleanup objectives.
- Submitted to NYSDEC on August 28, 2015 a report titled 2015 Annual Vapor Intrusion
 Study, Solvent Dock Area, Former Lockheed Martin French Road Facility, Utica, New York.
- Submitted to NYSDEC on September 2, 2015 a letter report titled Summary of Indium Soil Vapor Monitoring Points Decommissioning, Former Lockheed Martin French Road Facility, Utica, New York.
- Submitted to NYSDEC and NYSDOH on September 8, 2015 a document titled Work Plan for Soil Vapor Intrusion Sampling, Western Portion of Manufacturing Facility, Former Lockheed Martin French Road Facility, 525 French Road, Utica, New York. The work plan detailed proposed additional vapor intrusion sampling in the western building areas.
- Received an email dated September 9, 2015 from NYSDEC (S. Saucier) to Stantec (R. Mahoney) acknowledging receipt of the September 2, 2015 letter report summarizing the decommissioning of vapor probes on the Indium site, and indicating that NYSDEC had no questions on the report.
- Received a letter dated September 14, 2015 from NYSDEC to Lockheed Martin summarizing the annual State Pollution Discharge Elimination System (SPDES) Inspection performed on September 8, 2015 for the GCTS. The SPDES Inspection Report concluded that the facility was in compliance with the limits and conditions of Lockheed Martin's SDPES permit and no issues were identified.
- Received from NYSDEC during a project update conference call on September 15, 2015 a verbal indication that NYSDEC and NYSDOH would not be providing any further comment on several previously-submitted project reports and that the reports could be considered final.
- Removed from the site on September 21, 2015 a drum of non-hazardous sediment and water generated during monitoring well cleaning performed in May 2015. The drum was taken to Chemical Waste Management in Model City, New York for disposal on September 29, 2015.
- Received a letter dated September 21, 2015 from NYSDEC to Lockheed Martin approving the August 24, 2015 Annual Vapor Intrusion Study report and the September 8, 2015 Work Plan for Soil Vapor Intrusion Sampling, Western Portion of Manufacturing

Facility. The letter included approval of Lockheed Martin's proposal to suspend performance of further annual vapor intrusion testing in the eastern one-third of the building where vapor intrusion mitigation is being performed through SSDS operation. Acceptable system performance will continue to be monitored through vacuum monitoring.

2.0 Summary of Findings Made During the Reporting Period

The following findings were made during the reporting period:

- Results of third quarter groundwater monitoring indicated that the detected types and distribution of contaminants were similar to those of previous sampling events. Mann Kendall statistical analysis did not identify any statistically-significant increasing trends. Decreasing trends were observed in one Objective 1 well and one Objective 2 well. No historic maxima or sudden increases were observed, with the exception of methylene chloride at monitoring well MW-18.
- Groundwater elevations in Q3 indicated a lower water table when compared to the Q2 event and were generally lower than what was observed during the Q3 2014.
 Groundwater flow continued to reflect the influence of the GCTS.
- The 2015 Annual Vapor Intrusion Study, Solvent Dock Area included data from two sampling events, one in January and one in March. The data resulted in Monitoring and/or Mitigation status per the NYSDOH guidance matrix output at selected vapor monitoring points (VMPs). Each of the vapor monitoring probes assigned either a Monitor or Mitigate status have consistently achieved vacuum performance criteria as demonstrated through quarterly differential pressure monitoring of the SSDS. Because the annual event is designed to guide the decision on the need for mitigation, and because mitigation is already occurring through operation of the SSDS, the report recommended that annual vapor intrusion monitoring be discontinued, a recommendation which NYSDEC/ NYSDOH has since approved.
- As reported to NYSDEC/NYSDOH in the Assessment of Potential Soil Vapor Intrusion,
 Western Portion of Manufacturing Facility, a review of historical information and vapor
 intrusion sampling results for the western portions of the main manufacturing facility did
 not indicate known presence of CVOCs in the subsurface at concentrations that are
 likely to result in SVI in the western portions of the building. The previous SVI sampling
 data did however indicate at least low-level CVOC presence near the center of the
 facility.

To obtain more definitive data to demonstrate that vapor intrusion is not an issue in the western portions of the facility, Lockheed Martin has agreed to obtain six additional sample pairs in the western portions of the building as requested by NYSDEC/NYSDOH. Specifics details on the proposed sampling were presented in Stantec's Work Plan for Soil Vapor Intrusion Sampling, Western Portion of Manufacturing Facility, submitted to NYSDEC. The work plan was approved and activities related to the sampling are anticipated to commence in the Third Quarter 2015.

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.

5.0 Summary of Problems Encountered During the Reporting Period

No significant problems were encountered during the reporting period.

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

Changes in personnel during the reporting period include:

Charles Trione replaced Glenda Smith as Lockheed Martin's Project Lead.

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 OM&M summaries;
- Continue monthly project status calls with NYSDEC and NYSDOH;
- Provide copies of several project documents to the project repository (Utica Public Library) and upload electronic versions to the Lockheed Martin Solvent Dock Archive website;
- Conduct the fourth quarter groundwater sampling event (October 2015) in accordance with the draft Interim Groundwater Monitoring Program and provide a written summary of findings to NYSDEC;
- Respond to anticipated comments from NYSDEC/NYSDOH on the Work Plan for Excavation Initial Design Investigation. Upon receipt of NYSDEC/NYSDOH final approval of the work plan, subsurface exploration work will be performed.

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- Finalize locations with ConMed for six new vapor monitoring points (VMPs) for SVI sampling in the western building areas and install the VMPs (actual sampling is anticipated for Q1 of 2016); and
- Prepare an updated Draft Site Management Plan and Draft Environmental Easement package for NYSDEC review.

End of Report