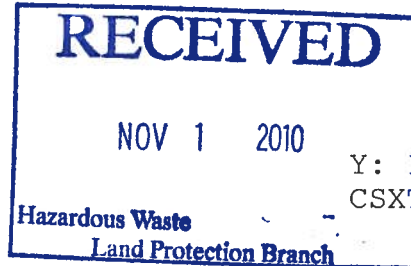




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October 28, 2010



Waycross, Georgia
Y: Part-B Permit RCRA
CSXT Project No. 9415589

Mr. Jim McNamara
Unit Coordinator
Hazardous Waste Management Branch
Georgia Department of Natural Resources
2 Martin Luther King, Jr. Drive, Suite 1154 East
Atlanta, Georgia 30334-9000

Subject: March 2010 Semi-Annual Corrective Measures Effectiveness
Report
Hazardous Waste Facility Permit No. HW-049(D), Waycross, GA

Dear Mr. McNamara:

Please find enclosed two (2) copies of the *March 2010 Semi-Annual Corrective Action Effectiveness Report* prepared in accordance with Section III.H.2 of *Post-Closure Care Facility Permit Number HW-049(D) Amendment*. The submitted document provides a summary and interpretation of the groundwater monitoring, surface water monitoring, and recovery/treatment system data collected at the facility between November 2009 and March 2010. In addition, this report provides an evaluation of the effectiveness of the groundwater corrective action program at the facility. In accordance with 40 CFR§270.11:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false

"Environmentally on Track"



Mr. McNamara
10/28/10
Page 2 of 2

information, including the possibility of fine and imprisonment for knowing violations."

We appreciate your consideration on this matter. If you have any questions please feel welcome to call me at (770) 819-2849 or ARCADIS, Jeff Beckner at (706)828-4421.

Sincerely,
CSX Transportation, Inc.

Matthew L. Adkins
Manager Environmental Remediation

Enclosures: March 2010 Semi-Annual Corrective Action Effectiveness Report (2 copies, 1 electronic)

cc: Facility File - (w/ 1 copy report)
ARCADIS, Augusta, GA



**MARCH 2010 SEMIANNUAL
CORRECTIVE ACTION
EFFECTIVENESS REPORT**

**OLD DRUM STORAGE AREA,
ALUM SLUDGE BASIN,
ACID-LIME SLUDGE AREA,
LOCOMOTIVE SHOP AREA,
LOCOMOTIVE PAINT, and
AIR BRAKE SHOP**

Post Closure Care Permit No. HW-049(D)
Ware County, Waycross, Georgia
CSX Transportation, Inc.
#9415589

This report was prepared and reviewed in accordance with the guidelines established by the Georgia Environmental Protection Division, by or under the direct supervision of the Georgia Registered Professional Geologist whose certification, signature, and affixed seal appear below.

"I certify that I am a qualified ground-water scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training and experience in ground-water hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding ground-water monitoring and contaminant fate and transport. I further certify that this report was prepared by myself or by a subordinate working under my direction."



Jeff S. Beckner, P.G. #744
Senior Scientist

**March 2010 Semiannual
Corrective Action
Effectiveness Report**

Permit No. HW-049(D)
Waycross, Georgia

Prepared for:
CSX Transportation, Inc.

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Date:
October 2010

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EXECUTIVE SUMMARY

Operation and maintenance of groundwater recovery/treatment systems, system performance monitoring, semiannual monitoring, and post-closure monitoring/maintenance were conducted in accordance with the requirements of Resource Conservation and Recovery Act (RCRA) facility permit number HW-049(D) during the period November 2009 through March 2010. This report provides a summary and interpretation of the groundwater level monitoring, surface water quality, recovery/treatment system and groundwater quality data collected during the reporting period at the Old Drum Storage Area (ODSA) and Locomotive Paint and Air Brake Shop (LPABS) at CSX Transportation, Inc.'s (CSXT's) Rice Yard in Waycross, Georgia. In addition, this report provides an evaluation of the effectiveness of the groundwater corrective action program at the facility.

Operation & maintenance (O&M) of the operating groundwater recovery/treatment systems during the reporting period consisted primarily of addressing iron fouling of pumps, piping, tanks, and the air stripper. Iron precipitation is most prevalent in the ODSA area groundwater as evidenced by frequent fouling of pumps and piping. The iron introduced into the groundwater treatment system from the ODSA contributes a significant portion of the total iron that precipitates in the air stripper.

Inspections of the ODSA and Alum Sludge Basin (ASB) final covers and site control measures during the reporting period indicated no significant cover integrity problems. Cover maintenance during the reporting period consisted of periodic mowing and fire ant treatment.

The groundwater, surface water, and treatment/recovery system data collected during this semiannual monitoring period indicate the following:

- Defined cones of depression were maintained by the operation of the LPABS (HWW-1) and ASB (HWW-2) horizontal recovery wells and recovery systems. Radii of influence from operation of the LPABS and ASB groundwater recovery systems are estimated at 975 feet (ft) by 800 ft and 1800 ft by 500 ft, respectively, with drawdown up to 9 ft. Localized drawdowns were observed near ODSA (up to 1 ft) and Locomotive Shop Area (LSA) (up to 0.5 ft) recovery systems. Overall, the groundwater recovery systems at ODSA and LSA have a smaller area of hydraulic influence on the water table as compared to the ASB and LPABS systems;
- The reported concentrations of Groundwater Contaminant Constituents

(GWCCs) in the Waycross Canal surface water, and the considerable reductions in GWCC concentrations in the LPABS wells south of the Waycross Canal, demonstrate the effectiveness of the horizontal wells in hydraulically controlling the facility groundwater;

- The presence of cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE), and vinyl chloride (VC) in groundwater indicate that natural reductive dechlorination of chlorinated volatile organic compounds (CVOCs) continues to occur even under increased aerobic conditions induced by groundwater pumping operations; and
- The total volume of groundwater recovered by the operating recovery systems during the period of November 2009 to March 2010 was approximately 11,016,280 gallons; 1,072,020 gallons at ODSA, 5,753,500 gallons at ASB, 660,560 gallons at LSA, and 3,530,200 gallons at LPABS. During the March 2010 monitoring event, the recovered groundwater reportedly contained 400 micrograms per liter ($\mu\text{g/L}$) of trichloroethene (TCE), 1,200 $\mu\text{g/L}$ of cis-1,2-DCE, 21 $\mu\text{g/L}$ of trans-1,2-DCE, 15 $\mu\text{g/L}$ of 1,1-dichloroethene (1,1-DCE), 21 $\mu\text{g/L}$ of VC, and 21 $\mu\text{g/L}$ of 1,1-dichloroethane (1,1-DCA).

1. INTRODUCTION

In accordance with 40 CFR §264.100(g) and Post Closure Care Facility Permit No. HW-049(D), this semiannual monitoring report provides groundwater and surface water monitoring data, groundwater recovery and treatment system data, and an evaluation of the effectiveness of the groundwater corrective action program at the ODSA, ASB, Acid-Lime Sludge Area (ALSA), LSA, and LPABS waste management units at CSXT's Rice Yard in Waycross, Georgia. This report covers the semiannual corrective action effectiveness monitoring period from November 2009 through March 2010.

1.1 SITE LOCATION

The Rice Yard is a rail yard owned and operated by CSXT in Waycross, Ware County, Georgia. The facility is located in the southwestern portion of the City of Waycross, and is situated in the southeastern part of the lower Coastal Plain. The facility extends approximately five miles along U.S. Highway 84. Figure 1 shows the location of the facility with topography and surface drainage features.

1.2 SITE REGULATORY HISTORY

In accordance with a June 30, 1986 consent order, CSXT performed an environmental assessment of the Waycross facility to characterize solid and hazardous waste streams generated by the current operations and to identify where land disposal or spills of solid or hazardous materials had occurred. This assessment was documented in the report "Waste Identification Survey - Waycross, Georgia Facility - August 1986."

Three locations [the ODSA, ASB, and Wastewater Treatment Plant/Grit Collection Area (WWTPA)] were identified as areas where land disposal of hazardous wastes had occurred after 1980. The three hazardous waste management units ODSA, ASB, and WWTPA ceased operations in 1985.

Since the three hazardous waste management units were subject to regulation under the Resource Conservation and Recovery Act (RCRA), a RCRA Part A permit application was submitted to the Georgia Environmental Protection Division (GAEPD) on August 29, 1986, for their proper closure. The permit was finalized in December 1986.

CSXT submitted a revised Part B - Post-Closure Permit Application in August 1987. On September 28, 1987, the GAEPD issued Hazardous Waste Facility Permit No. HW-049(D) for the post-closure care of the ODSA and ASB. The WWTPA was clean closed and reclassified as a solid waste management unit (SWMU) in 1989.

In October 1993, CSXT submitted the "Revised Part B - Post-Closure Permit Modification Application, Waycross, Georgia Facility, Volume I, Section 9.0 (Adding the Acid-Lime Sludge Area SWMU)." The Hazardous Waste Facility Permit No. HW-049(D) was amended on January 7, 1994, to incorporate the corrective action plan for remediating the ALSA SWMU.

In June 1995, CSXT submitted the "Part B - Post-Closure Permit Modification Application (Volume I, Section 10.0, adding the Locomotive Shop Area), Waycross, Georgia." The Hazardous Waste Facility Permit No. HW-049(D) was amended on September 29, 1995, to incorporate the corrective action plan for remediating the LSA SWMU.

On April 29, 1997, CSXT submitted the 10-year permit renewal application, which included revised corrective action plans for addressing the groundwater impacts at the ODSA and ASB. In response to the GAEPD's June 4, 1997 comments, the permit renewal application was modified and resubmitted on July 25, 1997. Final

modifications to the permit renewal application were submitted on August 6, 1997. The RCRA Part B Permit No. HW-049(D) was reissued to CSXT on September 30, 1997.

Based on the findings reported in the March 9, 1999 Corrective Action Assessment for the Alum Sludge Basin and Verification Investigation Reports for the Old Refuse Area No. 2 and the Old Runoff Pond Area, the corrective action plan for the impacted groundwater east of the ASB was modified and a permit modification application with the revised corrective action plan was submitted to the GAEPD on October 29, 1999.

In response to the GAEPD's December 16, 1999 comments on the permit modification application, CSXT submitted a revised permit modification application and "Groundwater and Surface Water Hydraulic Interaction Report and Pilot Test Work Plan" on February 28, 2000.

On May 2, 2000, the GAEPD approved the permit modification application. In accordance with Class 3 permit modification requirements, the public notice for the permit modification application was issued on June 20, 2000. On October 19, 2000, the amended hazardous waste facility permit became effective.

On March 29, 2002, CSXT submitted a permit modification application, which proposed a new groundwater corrective action system at the ASB to better control GWCC migration in this area and modifications to the groundwater corrective action effectiveness monitoring program.

On February 19, 2003, the GAEPD approved the permit modification application. In accordance with Class 3 permit modification requirements, the public notice for the permit modification application was issued in March 2003. On May 7, 2003, the amended hazardous waste facility permit became effective.

On March 30, 2007, CSXT submitted a 10-year permit renewal application which provided updated groundwater recovery system specifics and proposed revisions to the corrective measures monitoring system and protocol. On March 14, 2008, CSXT submitted Revision 1 of the 10-year permit renewal application.

2. SWMU DESCRIPTIONS AND CALCULATED BACKGROUND CONCENTRATIONS LIMITS (BCLs)

2.1 OLD DRUM STORAGE AREA (ODSA)

The ODSA is one of the permitted hazardous waste management units at CSXT's Rice Yard that was closed in accordance with RCRA requirements. The ODSA is presently

a vacant field west of the LPABS (see Figure 1). The site is approximately 550 feet long by 95 feet wide. Before 1985, as many as 4,000 empty drums were temporarily stored at the site awaiting sale to off-site drum recovery vendors. The empty drums had stored various solvents used in railroad equipment maintenance operations and some contained residual hazardous materials. Drum handling activities resulted in spills that impacted surface and subsurface soils. The ODSA layout and current monitoring well network are shown on Figure 2. ODSA monitor and recovery well construction details are summarized in Appendix A. Condition III.A.1 of the permit lists monitoring wells MW-11, MW-12, and MW-13 as the current point of compliance (POC).

The ODSA background concentration limits (BCLs) were established by sampling upgradient monitoring well MW-32 for four quarters and analyzing for the GAEPD-approved GWCC parameters. The analytical results from the four sampling events were used to calculate the mean and variance values to establish the BCL for each GWCC. The ODSA BCL values are summarized in Table 1. The BCLs are compared to downgradient monitoring data to evaluate corrective action effectiveness.

2.2 ALUM SLUDGE BASIN (ASB)

The ASB is one of the permitted hazardous waste management units at the CSXT's Rice yard that was closed in accordance with RCRA requirements. The ASB is east-southeast of the Maintenance Shop Area. This former surface impoundment was approximately 250 ft long by 200 ft wide and approximately six ft deep (see Figure 1). The site was used through January 1985 to deposit sludge from the wastewater treatment plant operations and had a maximum waste storage capacity of approximately 7,500 cubic yards. The ASB layout and current monitoring well network are shown on Figure 2. ASB monitor and recovery well construction details are summarized in Appendix A.

The ASB BCLs were established by sampling upgradient monitoring well MW-17 for four quarters and analyzing for the GAEPD-approved GWCC parameters. The analytical results from the four sampling events were used to calculate the mean and variance values to establish the BCL for each GWCC. The ASB BCL values are summarized in Table 1. The BCLs are compared to downgradient monitoring data to evaluate corrective action effectiveness.

2.3 ACID-LIME SLUDGE AREA (ALSA)

The ALSA is a SWMU located northeast of the Locomotive Shop Area at the CSXT's

Rice Yard (see Figure 1). The ALSA consists of the Refined Oil Acid Pit (Acid Sludge Pit) and the Acetylene-Lime Sludge Pit. For an unknown period of time up to 1969, a lubrication oil purification facility was operated by CSXT in the Locomotive Shop of the Waycross facility. Spent lubrication oil was refined using a stripper compound that incorporated sulfuric acid. This process generated a sludge that was deposited in the Acid Sludge Pit. The ALSA layout and current monitoring well network are shown on Figure 2. ALSA monitor well construction details are summarized in Appendix A.

The ALSA BCLs were established by sampling upgradient monitoring well MW-37 for four quarters and analyzing for the GAEPD-approved GWCC parameters. The analytical results from four sampling events were used to calculate the mean and variance values to establish the BCL for each GWCC. The ALSA BCL values are summarized in Table 1. The GAEPD's March 19, 1997 letter requested that VC be added to the GWCC list for the ALSA. CSXT is using the BCL of 1.0 micrograms/liter ($\mu\text{g/L}$) for vinyl chloride at the ALSA, which is consistent with the established VC BCL at the LSA. The BCLs are compared to downgradient monitoring data to evaluate corrective action effectiveness.

2.4 LOCOMOTIVE SHOP AREA (LSA)

The LSA is a SWMU located northwest of the ASB and southwest of the ALSA at CSXT's Rice Yard in Waycross, Georgia. The Locomotive Shop building is used for the maintenance and repair of locomotives. The LSA shop once contained a parts-cleaning vat, approximately eight-feet by eight-feet, in which TCE was used as a cleaning and degreasing agent. A portion of the vat was five to six feet below grade. Before the parts-cleaning vat was removed, the vat may have leaked or the contents may have been spilled resulting in a release. The use of the parts-cleaning vat is suspected of being a primary source for the TCE and related constituents found in downgradient groundwater. The LSA layout and current monitor and recovery well network are shown on Figure 2. LSA monitor and recovery well construction details are summarized in Appendix A.

The LSA BCLs were established by sampling upgradient monitoring well MW-3 for four quarters and analyzing for the GAEPD-approved GWCC parameters. The analytical results from the four sampling events were used to calculate the mean and variance values to establish the BCL for each GWCC. The LSA BCL values are summarized in Table 1. The BCLs are compared to downgradient monitoring data to evaluate corrective action effectiveness.

2.5 LOCOMOTIVE PAINT AND AIR BRAKE SHOP (LPABS)

The LPABS is a SWMU located southwest and north of the LSA and the Old Engine House (OEH), respectively (see Figure 1). The LPABS building is approximately 330 feet long by 165 feet wide with a northwest to southeast orientation. The original structure is made of red brick and has a peaked roof. There is an approximately 75-foot wide by 125-foot long by 2-foot deep locomotive transfer pit to the east of the LPABS building for transferring locomotives to and from the Fabrication Shop. In 1986 an assessment was conducted to investigate a potential hazardous waste release. The release may have occurred from frequent small quantity solvent spills that were reported in the southern portion of the locomotive transfer pit, outside the old Air Brake Shop. Further investigations revealed a patched concrete floor area, approximately five feet by five feet, near the southeast end of the LPABS building. Facility personnel indicated that a parts-cleaning vat was formerly located in this area, in which TCE was used as a cleaning and degreasing agent during the former Air Brake Shop operations. The LPABS layout and current monitor and recovery well network are shown on Figure 2. LPABS monitor and recovery well construction details are summarized in Appendix A.

2.6 SURFACE WATER

The Waycross Canal is a surface water drainage feature that runs along the southern and eastern boundaries of the facility (see Figure 1). The shop area ditch feeds into Waycross Canal just west of the ASB. Both surface water bodies receive runoff and groundwater from the operational areas of the railyard. The surface water background levels for the Waycross Canal were established by sampling the surface water in the Waycross Canal for four quarters at a sample location upstream of the ODSA (CW-14/W-30) located 150 feet west of MW-4 (see Figure 2). The analytical results from the four sampling events were used to calculate the mean and variance values to establish the surface water background levels. The surface water background values are included in Table 1.

3. WORK PERFORMED DURING THE REPORTING PERIOD

The work performed during this reporting period includes daily and monthly inspections of groundwater corrective action systems, regular operational maintenance of the corrective action systems, semiannual post-closure care inspections of the ODSA and ASB, and semiannual groundwater/surface water monitoring to ensure the effective operation of the groundwater recovery and treatment system as prescribed in the permit.

3.1 DAILY INSPECTION AND MAINTENANCE

Daily inspection events currently consist of the recording of recovery and treatment system operating data and inspection of groundwater recovery and treatment systems. Daily inspection/repair records were prepared during the monitoring period and were used to document the groundwater recovery rates, system downtime, and system maintenance. Records of inspection and maintenance are maintained at the facility. Maintenance logs from the reporting period are provided in Appendix B.

Based on the O&M logs since groundwater recovery and treatment began at the facility, it is apparent that a significant portion of the O&M is associated with iron fouling of pumps, piping, tanks, and the air stripper. Iron precipitation is most prevalent in the ODSA area groundwater as evidenced by frequent fouling of pumps and piping. The iron introduced into the groundwater treatment system from the ODSA contributes a significant portion of the total iron that precipitates in the air stripper.

3.2 MONTHLY INSPECTION, MONITORING, AND REPORTING

Monthly inspection and monitoring events currently consist of the collection of a treatment system effluent sample, recording of recovery and treatment system operating data, groundwater recovery and treatment system inspections, and inspections of the final covers of the ODSA and ASB. The monthly recovered groundwater volumes and effluent sample analytical results are used to prepare a monthly self-monitoring report as required under National Pollution Discharge Elimination System (NPDES) Permit No. GA0046680 and a monthly groundwater use report as required under groundwater withdrawal permit No 148-0008. Monitoring reports were prepared and submitted to the GAEPD during the monitoring period. Copies of the reports are maintained at the facility and included in Appendix C.

3.3 SEMIANNUAL EFFECTIVENESS MONITORING

Groundwater quality samples were collected from each recovery well and select monitor wells at LPABS, ODSA, and background well (MW-3) during March 2010 to monitor the relative concentration changes of TCE and associated transformation products/impurities in the groundwater and to evaluate the effectiveness of the recovery system. Upon collection, the groundwater samples were forwarded to TestAmerica Laboratories, Inc. in Savannah, Georgia for analysis. Below is a list of the analytical parameters for the recovery wells, monitor wells, and surface water sample locations for each area:

- ODSA: Groundwater samples were collected from monitor wells MW-11, MW-12, MW-13, MW-32, MW-34, MW-35, MW-36, MW-47, MW-72, MW-73, MW-74, MW-75, MW-76, MW-77, MW-3 (background well) then analyzed for select CVOCs using Environmental Protection Agency (EPA) SW-846 Method 8260, and lead and zinc using EPA SW-846 Method 6010. Subsequent analyses were conducted from monitor wells MW-12 and MW-34. They were analyzed for dibenzofuran semi-volatile organic compounds (SVOCs) using EPA SW-846 Method 8270C LL and polycyclic aromatic hydrocarbons (PAHs) using EPA SW-846 Method 8270C. Monitor well MW-13 was also analyzed for Appendix IX parameters;
- LPABS: Groundwater samples were collected from monitor wells MW-94 (12-22), MW-95, MW-96 (48-58), MW-97, MW-98, MW-102, MW-107 (70-80), MW-108 (10-20), MW-108 (35-45), MW-108 (46-56), and MW-108 (70-75) then analyzed for select CVOCs using EPA SW-846 Method 8260;
- Surface Water: Surface water was collected at sample locations CW-1, CW-2, CW-3, W-6, W-10, W-15, W-25, W-26, W-28, W-33, W-36, W-45, and W-48 then analyzed for select VOCs using EPA SW-846 Method 8260; and
- Recovery Wells: Samples from the ODSA, ASB, LSA, and LPABS treatment system influents and the combined stripper influent were collected and analyzed for select CVOCs using EPA SW-846 Method 8260.

Sampled wells were purged by low-flow sampling techniques in general accordance with USEPA *Field Branches Quality System and Technical Procedures*, Region IV, Athens, Georgia (QSTP) until field indicator parameters (pH, specific conductance, and temperature) stabilized. A new disposable bailer or new sample tubing were used during sample collection at each well. In addition, the sampling team donned new, disposable nitrile gloves prior to purging and sample collection. Field sampling logs are provided in Appendix D.

3.4 SEMIANNUAL POST CLOSURE CARE INSPECTION

In accordance with Sections II and III of the Post Closure Care Facility Permit No. HW-049(D), an inspection of the ODSA and ASB final covers and site control measures were conducted in March 2010. No deficiencies were noted during the March 2010 inspection of the ODSA and ASB final covers and site control measures.

In accordance with Section III of the Post Closure Care Facility Permit No. HW-049(D),

monitoring and recovery wells were inspected and repaired as necessary in March 2010. Minor deficiencies were noted during the March 2010 monitoring well inspection. Noted deficiencies were limited to missing bolts on protective vaults and vegetation around well casings. The cover and well inspection forms for the monitoring period are provided in Appendix E.

4. GROUNDWATER FLOW DIRECTION AND RATE

Measured depth to groundwater was recorded for monitor wells specified in the permit and permit application during the March 2010 monitoring event. Water levels were measured in each well on March 31, 2010 under pumping conditions. Measured water levels were converted to elevation in feet mean sea level and are tabulated in Table 2.

Comparison of the configuration of the potentiometric surface of shallow groundwater under pumping conditions (Figure 3) to historical non-pumping conditions indicates significant drawdown of the water table from groundwater recovery at horizontal well HWW-1 (LPABS) and moderate drawdown at HWW-2 (ASB). The general direction of shallow groundwater flow is south-southeast towards the Waycross Canal. Measured water levels indicate that the operation of well HWW-1 is responsible for approximately 9 ft of drawdown in vicinity of the pump intake (near MW-101). Drawdown resulting from groundwater recovery at HWW-1 is observed over an area approximately 975 ft by 800 ft.

The influence of groundwater recovery from well HWW-2 is less than observed at HWW-1 with maximum drawdown of approximately 5 ft. The drawdown resulting from groundwater recovery at HWW-2 is observed over an area of approximately 1800 ft by 500 ft.

Groundwater recovery operations at ODSA and LSA were observed to result in drawdowns of approximately 1.5 ft and 0.5 ft, respectively. Overall, the groundwater recovery systems at ODSA and LSA have a smaller area of hydraulic influence on the water table as compared to HWW-1 and HWW-2.

5. GROUNDWATER AND SURFACE WATER QUALITY

5.1 GROUNDWATER

The laboratory analytical reports for the groundwater samples collected during the March 2010 semiannual effectiveness monitoring event are presented in Appendix F and summarized in Tables 3 and 4. Figures 4, 5, and 6 illustrate the distribution of

TCE, cis-1,2-DCE, and VC (target CVOCs), respectively. In addition, select plots of target CVOC concentrations versus time are provided in Appendix G.

5.1.1 Background Well MW-3

Facility background well MW-3, located upgradient of the ODSA area, was also sampled in March 2010, and the reported results are included with ODSA analytical data in Table 3. With the exception of lead, all analytical constituent concentrations were reported below detection. The reported lead concentration (12 µg/L) was below the BCL (50 µg/L). Reported lead concentrations during the previous two sampling events (March 2009 and March 2008) were 9.2 µg/L and 7.9 µg/L, respectively. These low concentrations of lead represent normal fluctuations in shallow groundwater.

5.1.2 ODSA

Table 3 summarizes the groundwater analytical data for the ODSA. CVOC, lead, and zinc concentrations in ODSA groundwater from the March 2010 monitoring event are discussed below.

Four CVOCs (TCE, PCE, cis-1,2-DCE, and VC) were detected above the established BCL concentration. TCE was reported at monitor well MW-35 (29 µg/L). PCE was reported at monitor wells MW-11 (1.6 µg/L), MW-32 (1.5 µg/L), MW-34 (2.7 µg/L), MW-35 (260 µg/L) and MW-47 (7.7 µg/L). Reported cis-1,2-DCE concentrations ranged from 1.3 µg/L to 2000 µg/L at many of the monitor wells sampled. Reported cis-1,2-DCE concentrations in MW-36 appear to be trending steadily upward from March 2005 (<1 µg/L) to March 2010 (2000 µg/L). Vinyl chloride was reported at two monitor wells MW-34 and MW-36 (9.9 µg/L and 140 µg/L, respectively). Reported concentrations of vinyl chloride appear to be trending steadily upward in MW-36 from March 2005 (<1 µg/L) to March 2010 (140 µg/L). The noted increase in cis-1,2-DCE and VC, at well MW-36, indicates natural biodegradation of course TCE.

SVOC constituents were reported above the BCL concentration at monitor well MW-12. These results are consistent with fluctuations observed during previous monitoring events which show an overall decrease in SVOC concentrations.

Reported lead and zinc concentrations in ODSA groundwater were all below established BCLs and groundwater protection standards (GWPS's) during the March 2010 monitoring event.

5.1.3 LPABS

Table 4 summarizes the groundwater analytical data for the LPABS. CVOC concentrations in LPABS groundwater from the March 2010 monitoring event are discussed below.

TCE and its degradation products, cis-1,2-DCE, and VC, are the primary CVOCs in the LPABS groundwater, with the highest CVOC concentrations during the March 2010 monitoring event being reported at monitor well MW-96 (48'-58'). Other CVOCs were present at concentrations above method detection limits including trans-1,2-DCE; 1,1-DCE; 1,1-DCA; chlorobenzene; and 1,1,1-TCA. Although GWCCs have not been finalized for the LPABS, the extended list of CVOCs selected for analyses during the March 2010 monitoring event is consistent with prior sampling events.

Reported TCE concentrations ranged from 19 µg/L [MW-108 (10-20)] to 71,000 µg/L [MW-96 (48-58)], reported cis-1,2-DCE concentrations ranged from 1.4 µg/L (MW-112 [30-50]) to 5,800 µg/L (MW-96 [48-58]), and reported VC concentrations ranged from 1 µg/L (MW-90) to 110 µg/L (MW-102). CVOCs in LPABS groundwater during the March 2010 monitoring event are similar or lower than previous data and show an overall decreasing trend. The presence of cis-1,2-DCE and VC indicate ongoing natural reductive chlorination in LPABS groundwater.

5.2 SURFACE WATER

The laboratory analytical reports for surface water samples collected from the Waycross Canal and the Shop Area Ditch during March 2010 are presented in Appendix F and summarized with the historical data in Table 5. Figure 7 illustrates the distribution of reported CVOC concentrations in the surface water during the March 2010 monitoring event.

CVOCs periodically detected in the Shop Area Ditch include TCE, cis-1,2-DCE, and 1,1-DCE, with reported concentrations generally decreasing in a downgradient direction from W-10 to W-6. TCE was only detected in surface water sample location W-26 (1.4 µg/L) during the March 2010 monitoring event. Low concentrations of cis-1,2-DCE concentrations were detected in the Shop Area Ditch during the March 2010 monitoring event at locations W-6 (1.4 µg/L), and W-26 (6.9 µg/L). No CVOCs were detected in the Waycross Canal during the March 2010 monitoring event.

Time versus concentration plots (Appendix G) of reported TCE and cis-1,2-DCE concentrations in the Waycross Canal indicate CVOC concentrations quickly

decreased in late 2001 to early 2002 immediately following start-up of groundwater recovery via horizontal wells HWW-1 and HWW-2. The low reported TCE and cis-1,2-DCE concentrations, observed during the March 2010 monitoring event, are consistent with fluctuations observed at each of the sampling locations since 2002.

6. GROUNDWATER RECOVERY AND TREATMENT

The groundwater recovery and treatment systems operating in the four areas were inspected and maintained during the reporting period as described in Sections 3.1 and 3.2. Following is a summary of the groundwater recovery/treatment operations and efficiency during the period.

6.1 GROUNDWATER RECOVERY

The volume of groundwater withdrawal is currently recorded during daily and monthly inspections of ODSA recovery wells WW-43 through WW-48; ASB recovery well HWW-2; LSA recovery wells WW-19 through WW-26, WW-28 through WW-32, and WW-35; and LPABS recovery well HWW-1. The recorded volumes of groundwater recovered from each system are summarized in Table 6. The total volume of groundwater recovered from the ODSA during the reporting period (November 2009 through March 2010) was approximately 1,072,020 gallons, which represents an average continuous withdrawal of approximately 5 gallons per minute (gpm). The total volume of groundwater recovered from the ASB during the reporting period was 5,753,500 gallons, which represents an average continuous withdrawal of approximately 27 gpm. The total volume of groundwater recovered from the LSA during the reporting period was 660,560 gallons, which represents an average continuous withdrawal of approximately 3 gpm. The total volume of groundwater recovered from the LPABS during the reporting period was 3,530,200 gallons, which represents an average continuous withdrawal of approximately 16 gpm.

The total volume of groundwater recovered (Table 7) during the period of November 2009 to March 2010 was approximately 11,016,280 gallons. The total volume of groundwater recovered and treated since start-up of the five recovery systems (includes ALSA from 1994 to 2000) from October 1993 through March 2010, is approximately 368,248,865 gallons.

6.2 GROUNDWATER TREATMENT

Recovered groundwater from the four current recovery areas is pumped to an equalization tank and then transferred to a low-profile, shallow-tray air stripper for

treatment. The treated water is discharged to Outfall No.002 of NPDES Permit No. GA0046680. An effluent sample is collected every month during periods of discharge and analyzed for select parameters specified in NPDES Permit No. GA0046680.

6.2.1 Influent

Groundwater treatment system samples from the individual and combined system influents from ODSA, ASB, LSA, and LPABS were collected during the March 2010 monitoring event. The ODSA influent contained cis-1,2-DCE (5.1 µg/L); the ASB influent contained TCE (560 µg/L), cis-1,2-DCE (65 µg/L), and 1,2-dichlorobenzene (5.9 µg/L); the LSA influent contained TCE (1,400 µg/L), cis-1,2-DCE (410 µg/L), and VC (32 µg/L); and the LPABS influent contained TCE (220 µg/L), cis-1,2-DCE (3,100 µg/L), trans-1,2-DCE (51 µg/L), 1,1-DCE (45 µg/L), VC (55 µg/L), and 1,1-DCA (58 µg/L). The combined groundwater influent to the treatment system contained TCE (400 µg/L), cis-1,2-DCE (1,200 µg/L), trans-1,2-DCE (21 µg/L), 1,1-DCE (15 µg/L), VC (21 µg/L), and 1,1-DCA (21 µg/L). Historic and current CVOC concentrations in ODSA, ASB, LSA, LPABS, and combined influent are summarized in Table 7.

The influent data are used to calculate the estimated mass recovery of TCE and related transformation products by multiplying the volume of recovered groundwater (semiannual total) times the total reported CVOC concentrations in the influent concentration. Total estimated CVOC mass recovered for the reporting period is 154 pounds, and the total estimated mass recovered since April 1999 is approximately 8,722 pounds (see Table 6).

6.2.2 Effluent

No analyzed organic constituents were detected in the system effluent during the reporting period; indicating that the groundwater treatment system operated at nearly 100 percent efficiency throughout the reporting period. Monthly NPDES discharge monitoring reports for the monitoring period are provided in Appendix C.

6.3 Groundwater Recovery/Treatment System Effectiveness

The effectiveness of the groundwater recovery system is determined by evaluating the relative change in concentrations of the constituents present in recovered groundwater and by evaluating the hydraulic control the groundwater recovery systems have on shallow groundwater and surface water at the facility. The relative change in CVOC concentrations in system influent over time was determined by plotting the concentration of individual and total CVOCs versus time (Appendix H) in each of the

groundwater recovery systems. Overall, total CVOC concentrations in combined system influent have decreased since start-up of recovery wells HWW-1 and HWW-2 in 2002. Time versus concentration plots for individual recovery systems indicate decreasing concentrations in ASB and LPABS influents, and fluctuating but stable concentrations in ODSA and LSA influents.

Reported total CVOC concentrations during the March 2010 monitoring event were 5.1 µg/L in ODSA influent, 630.9 µg/L in ASB influent, 1,842 µg/L in LSA influent, and 3,529 µg/L in LPABS influent. The LPABS influent contained approximately 59 percent of the total CVOCs in recovered groundwater.

Comparison of groundwater recovery rates from LPABS and ASB to ODSA and LSA systems indicate that horizontal recovery wells HWW-1 and HWW-2 were responsible for approximately 81 percent of the recovered groundwater at the facility during the reporting period (see Table 6). Overall, the groundwater recovery systems at ODSA and LSA have a smaller area of hydraulic influence on shallow groundwater as compared to recovery wells HWW-1 and HWW-2.

The small concentrations of CVOCs detected in the surface water samples and the elimination and/or considerable reductions in CVOC concentrations detected in groundwater downgradient from the HWMU/SWMU areas, and south of the Waycross Canal, indicate that the current groundwater recovery systems are effectively controlling migration of GWCCs.

7. GROUNDWATER RECOVERY AND TREATMENT SYSTEM MODIFICATIONS

There were no system modifications implemented during the reporting period. System downtime during the reporting period was attributed primarily to ODSA effluent line repairs, pumps and compressor repairs at LSA, and cleaning/repair of the air stripper influent manifold piping.