Charles Gruenenfelder

Thank you for the opportunity to offer comments on the draft SIA Agreed Order DE 24355. A few comments for your consideration are presented below.

Exhibit B, Scope of Work and Schedule
TASK 1 - Site Assessment Report for PFAS
Sampling and Analysis Plan

Please consider the following proposed modifications:

Page 7,
Section 9.9 - SUGGESTED REVISION: Analytical procedures, methods, detection limits, and analytical concentration goals to achieve MTCA Method A and Method B cleanup levels

SUGGESTED LANGUAGE to insert after Section 9.9 as a new Section 9.10 line item: Analytical Data Review and Data Validation Procedures

Section 13.3 - SUGGESTED REVISION: Description of field parameter measurements, instrumentation, and well purging protocols to achieve geochemical stabilization prior to sampling.

TASK 2 - REMEDIAL INVESTIGATION

Page 8,
Section 2.4 SUGGESTED REVISION: Estimate hydraulic parameters such as hydraulic conductivity, porosity, horizontal and vertical hydraulic gradients, and groundwater flow velocity within primary water-bearing hydrostratigraphic units

Page 9
Section 2.7 SUGGESTED REVISION: Analyze groundwater samples for a contaminant suite guided by historical property use, existing facility operations, and suspected contaminants of potential concern based on available sampling and analysis data

Section 2.9 SUGGESTED REVISION: Generate maps and/or figures showing groundwater potentiometry for each primary, water-bearing hydrostratigraphic unit and cross-sections depicting hydrostratigraphic units and apparent contact elevations

Section 5.1 SUGGESTED REVISION: If the potential for surface water impact is found, analyze surface water samples for the applicable contaminant suite that addresses both human and ecological receptors.

TASK 6 - QUARTERLY GROUNDWATER MONITORING AND REPORTING

Page 16
Section 4.1.1 SUGGESTED REVISION: Evaluation of groundwater flow rates and directions including potentiometric maps for each discrete hydrostratigraphic unit (i.e., unconsolidated deposits, Basalt A, Basalt B)

Section 4.1.2 SUGGESTED REVISION: Evaluation of horizontal and vertical hydraulic gradients

Section 4.2.2 SUGGESTED REVISION: Results summary including time-series concentration plots and an analysis of statistically-significant trends once adequate data have been generated.