

Naval Facilities Engineering Systems Command Northwest Silverdale, Washington

Final

Supplemental Site Inspection Report Addendum for Per- and Polyfluoroalkyl Substances Outlying Landing Field Coupeville

Naval Air Station Whidbey Island Oak Harbor, Washington

January 2022



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Prepared for NAVFAC Northwest by CH2M HILL, Inc. Bellevue, Washington Contract N62470-16-D-9000 CTO 4405



Contents

Acro	nyms an	d Abbrev	viations	vii						
1	Intro	duction a	and Site Description	1-1						
	1.1	Purpo	ose and Objectives							
	1.2	Site Ba	ackground and Description	1-2						
2	Inves	vestigation Field Activities								
	2.1	Aquife	er Test Design							
		2.1.1	Baseline Water Level Monitoring							
		2.1.2	Step-rate and Constant-rate Pumping Tests							
		2.1.3	Recovery Monitoring							
	2.2	Summ	nary of Aquifer Testing Results							
		2.2.1	Step-Rate Tests	2-2						
		2.2.2	Constant-Rate Tests							
		2.2.3	Discussion							
	2.3	Geote	echnical Sample Results							
	2.4	Phase	a Monitoring Well Installation							
		2.4.1	Property Access							
		2.4.2	Archaeological Resources Monitoring							
		2.4.3	Site Preparation and Utility Location							
		2.4.4	Soil Boring and Well Installation							
		2.4.5	Monitoring Well Development							
	2.5	Invest	tigation-derived Waste Management and Disposal							
		2.5.1	Phase 3							
3	Num	erical Mo	odeling	3-1						
	3.1	Previc	ous Groundwater Flow Modeling							
	3.2	Mode	ling Objectives							
	3.3	Groun	ndwater Flow Model Design Revisions							
		3.3.1	Updated Model Structure							
		3.3.2	Subsurface Hydraulic Parameters							
		3.3.3	Boundary Conditions							
		3.3.4	Recharge and Evapotranspiration Properties							
	3.4	Mode	I Flow Recalibration							
		3.4.1	Calibration Targets							
		3.4.2	Calibration Procedure							
		3.4.3	Calibration Results							
		3.4.4	Evaluation of Pre-Keystone Well Flow Field							
	3.5	Vados	se Zone Solute Transport							
		3.5.1	Code Selection							
		3.5.2	Grid Construction							
		3.5.3	Subsurface Hydraulic Parameters							
		3.5.4	Solute Transport Parameters							
		3.5.5	Initial Concentrations							
		3.5.6	Boundary Conditions							
		3.5.7	Time Discretization							
	- -	3.5.8	Results							
	3.6	Satura	ated Zone Solute Transport Model							
		3.6.1	Code Selection							

Refer	ences		5-1
Concl	usions a	nd Recommendations	4-1
3.7	Mode	l Limitations	
	3.6.5	Results	3-16
	3.6.4	Time Discretization	
	3.6.3	Solute Boundary Conditions and Initial Concentrations	
	3.6.2	Model Grid and Parameterization	

Appendices

4

5

- A Aquifer Test Hydrographs
- B Outlying Landing Field Site Inspection Phase 1 Soil Geotechnical Results
- C State Historic Preservation Office Section 106 Concurrence Letter, Outlying Landing Field Coupeville Archaeological Monitoring and Treatment Plan, and Archaeological Monitoring Technical Memorandum
- D Soil Boring Log, Monitoring Well Construction Diagram, and Development Log
- E Sampling and Analysis Plan Field Change Request
- F Investigation-Derived Waste Profiles

Tables

- 2-1 Summary of Aquifer Test Design
- 2-2 Soil Grain Size Distribution
- 2-3 Soil Geotechnical Properties
- 3-1 Descriptions of Coupeville Groundwater Model Layers
- 3-2 Steady-State Calibration Targets
- 3-3 Transient Calibration Targets 2017/2018 Keystone Well Aquifer Test
- 3-4a Transient Calibration Targets WI-CV-MW31M Aquifer Test
- 3-4b Transient Calibration Targets WI-CV-MW29M Aquifer Test
- 3-5 HYDRUS-1D Soil-Specific Input Parameters
- 3-6 HYDRUS-1D Solute-Specific Input Parameters
- 3-7 Initial Soil Concentration, WI-CV-MW20S (Building 2709 Release Area)
- 3-8 Initial Soil Concentration, WI-CV-MW21S (Facilities 1, 2, and 11 Release Area)

Figures

- 1-1 Base Location Map
- 2-1 Aquifer Test Layout
- 2-2 Groundwater Monitoring Well Network and Soil Boring Locations
- 3-1 Coupeville Groundwater Model Grid
- 3-2 Boundary Conditions
- 3-3 Calibration Targets
- 3-4 Simulated Steady-State Groundwater Elevation Residuals Shallow Elevation Interval
- 3-5 Simulated Steady-State Groundwater Elevation and Residuals Intermediate Elevation Interval
- 3-6 Simulated Steady-State Groundwater Elevation Contours and Residuals Deep Elevation Interval
- 3-7 Steady-State Simulated versus Observed Groundwater Elevations and Calibration Statistics
- 3-8a Simulated versus Observed Response to Pumping of the Keystone Well
- 3-8b Simulated versus Observed Response to Pumping of the Keystone Well
- 3-9a Simulated versus Observed Response to Pumping of WI-CV-MW31M
- 3-9b Simulated versus Observed Response to Pumping of WI-CV-MW31M

- 3-10a Simulated versus Observed Response to Pumping of WI-CV-MW29M
- 3-10b Simulated versus Observed Response to Pumping of WI-CV-MW29M
- 3-11 Final Distribution of Horizontal Hydraulic Conductivity
- 3-12 Final Distribution of Deep Percolation of Precipitation
- 3-13 Simulated Distribution of Active Evapotranspiration
- 3-14 Particle Tracking from On-Base PFAS Release Areas under Present-Day Pumping Conditions
- 3-15 Particle Tracking from On-Base PFAS Release Areas under Pre-2008 Pumping Conditions
- 3-16 Simulated PFOA Transport from the Vadose Zone
- 3-17 Simulated PFOS Transport from the Vadose Zone
- 3-18a Projections of PFOA Plume Migration in Shallow Elevation Interval
- 3-18b Projections of PFOA Plume Migration in Intermediate Elevation Interval
- 3-18c Projections of PFOA Plume Migration in Deep Elevation Interval
- 3-19a Projections of PFOS Plume Migration in Shallow Elevation Interval
- 3-19b Projections of PFOS Plume Migration in Intermediate Elevation Interval
- 3-19c Projections of PFOS Plume Migration in Deep Elevation Interval

Acronyms and Abbreviations

%	percent
3D	three-dimensional
APS	Applied Professional Services Inc.
bgs	below ground surface
CGFM	Coupeville Groundwater Flow Model
CGM	Coupeville Groundwater Model
CH2M	CH2M HILL, Inc.
CSM	conceptual site model
CTO	Contract Task Order
ET	evapotranspiration
f _{oc}	fractional organic carbon
g/cm ³	grams per cubic centimeter
GHB	general head boundaries
gpm	gallon per minute
IDW	investigation-derived waste
K _d	distribution coefficient
K _{oc}	soil organic carbon-water partition coefficient
K _h	horizontal hydraulic conductivity
K _v	vertical hydraulic conductivity
m/d	meters per day
m²/d	square meters per day
mg/kg	milligrams per kilogram
mL/g	milliliters per gram
mm	millimeters
NAVD88	North American Vertical Datum of 1988
NAVFAC	Naval Facilities Engineering Systems Command
Navy	Department of the Navy
ng/L	nanograms per liter
OLF	Outlying Landing Field
PA	Preliminary Assessment
PEST	parameter estimation
PFAS	per- and polyfluoroalkyl substance
PFOA	perfluorooctanoic acid
PFOS	perfluorooctanesulfonic acid
PVC	polyvinyl chloride
RI RMS	Remedial Investigation root mean square
SAP	Sampling and Analysis Plan
SI	Site Inspection
SOP	Standard Operating Procedure
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey

Introduction and Site Description

CH2M HILL, Inc. (CH2M) was contracted by Naval Facilities Engineering Systems Command (NAVFAC) Northwest to perform a supplemental site inspection (SI) for per- and polyfluoroalkyl substances (PFAS) at Outlying Landing Field (OLF) Coupeville in Island County, Washington (**Figure 1-1**). This Supplemental SI Report Addendum presents the data and findings obtained during aquifer testing and groundwater modeling that was developed, calibrated, and updated for the OLF Coupeville site as a part of the analysis associated with the Supplemental SI. This report addends the Supplemental SI Report currently in Draft (CH2M, 2021). This report was prepared for NAVFAC Northwest under the Comprehensive Long-term Environmental Action – Department of the Navy (Navy) 9000, Contract N62470-16-D-9000, Contract Task Order (CTO) 4405.

The field activities discussed in Section 2 of this report addendum were performed in accordance with the *Final Sampling and Analysis Plan, Supplemental Site Inspection, Outlying Landing Field Coupeville, Naval Air Station Whidbey Island* (CH2M, 2019a) and *Final Sampling and Analysis Plan Addendum, Supplemental Site Inspection, Outlying Landing Field Coupeville, Naval Air Station Whidbey Island* (CH2M, 2020a), henceforth referred to as the SAP and SAP Addendum, respectively. Field activities associated with the Supplemental SI were planned and carried out in three phases:

- Phase 1 12 soil borings (8 were completed as new monitoring wells), geotechnical soil sampling (2 locations), depth-discrete groundwater grab sampling for PFAS (7 locations), and soil sampling (11 locations) and monitoring well sampling (8 new wells and 32 existing wells) for PFAS targeting suspected PFAS release areas and data gaps between suspected release areas and on-Base and off-Base areas where PFAS has been detected.
- **Phase 2** Installation and sampling of 5 new monitoring wells based on Phase 1 data, synoptic water level survey, and aquifer testing.
- Phase 3 Installation of one off-base monitoring well northeast of OLF Coupeville.

Details and results of the field investigation for Phase 1 and Phase 2 field investigation are documented in the Supplemental SI Report (CH2M, 2021). This report addendum includes the results for geotechnical sampling (Phase 1), aquifer testing (Phase 2), and installation of one off-base monitoring well (Phase 3). The geotechnical sampling performed during Phase 1 of the Supplemental SI was used in the development of the PFAS solute transport model. The methodology for groundwater flow and PFAS solute transport modeling are described in Section 3.

1.1 Purpose and Objectives

The overall objectives of the Supplemental SI were defined in the SAP (CH2M, 2019a). The objectives were as follows:

- Identify whether there were releases of PFAS-containing compounds to the environment from the on-Base potential release areas that were identified in the Preliminary Assessment (PA) (CH2M, 2018a) as requiring further investigation (these areas are referred to as potential source areas in the PA).
- Refine the understanding of groundwater flow and potential PFAS migration directions between potential release areas and/or on-Base groundwater monitoring wells and off-Base drinking water wells with perfluorooctanoic acid (PFOA) and/or perfluorooctane sulfonate (PFOS) exceedances of the United States Environmental Protection Agency (USEPA) lifetime health advisory.
- Quantify the hydraulic properties of the aquifer system at OLF Coupeville.
- Refine the understanding of the distribution of PFAS within the groundwater system at OLF Coupeville.

The first of these objectives is discussed in the Supplemental SI Report (CH2M, 2021). The latter three of these objectives are further addressed through the recalibration and update of the groundwater flow model developed in 2018, as described in the expedited SI Report (CH2M, 2018b), and the development of solute transport models for two PFAS, PFOS and PFOA. Due to current Navy guidance, which is to focus on PFOS, PFOA, and PFBS, solute transport modeling was not completed for perfluoroheptanoic acid (PFHpA), perfluorohexane sulfonate (PFHxS), and perfluorononanoic acid (PFNA). Due to low concentrations and little-known transport properties, solute transport modeling was not completed for perfluorobutane sulfonate (PFBS). This Supplemental SI Report Addendum outlines the approach taken to achieve the listed objectives and provides conclusions based on data collected and recommendations for further study.

1.2 Site Background and Description

Refer to the OLF Coupeville Supplemental SI Report (CH2M, 2021) for a detailed description of site background and physical setting of OLF Coupeville, including site history, locations of potential PFAS releases, and relevant information on the physical, environmental, and hydrogeologic setting at the site.



This section documents the field activities performed in support of aquifer testing and Phase 3 monitoring well installation at OLF Coupeville in May 2020. This section also summarizes the aquifer testing results and documents the results of geotechnical sampling performed during Phase 1 of the Supplemental SI (July through December 2019).

2.1 Aquifer Test Design

Two aquifer tests were conducted at OLF Coupeville using on-Base monitoring wells. The tests were designed as pumping tests with each test consisting of one pumping well and several observation wells. The pumping well for Test 1 WI-CV-MW31M and the pumping well for Test 2 was WI-CV-MW29M. Both pumping wells were installed during Phase 2 of the OLF Coupeville Supplemental SI and constructed as 4-inch diameter monitoring wells. Each aquifer test consisted of a baseline monitoring period, a step-rate pumping test, a constant-rate pumping test, and a recovery monitoring period. A summary of the design of the aquifer tests is presented in **Table 2-1**. Observation wells were selected as those in closest proximity to the pumping wells, which would demonstrate measurable drawdown, and included wells screened in the shallow, intermediate, and deep elevation intervals. The monitoring networks for the two tests are shown on **Figure 2-1**.

2.1.1 Baseline Water Level Monitoring

Electronic pressure transducers with built-in data loggers were deployed to all pumping and observation wells selected for the aquifer test four days prior to the start of the first pumping test to establish baseline water level conditions. Manual groundwater level measurements were taken at the time of transducer deployment and at the end of the baseline monitoring period. Additionally, a transducer and a barometric pressure logger were deployed to WI-CV-MW08M to record approximated background water level and atmospheric pressure changes throughout the aquifer testing period.

2.1.2 Step-rate and Constant-rate Pumping Tests

The step-rate pumping tests were conducted to determine the maximum sustainable pumping rate for each well. The tests were conducted by pumping the wells at a constant rate for several time-steps of up to 1 hour, increasing the pumping rate for each sequential time step if the water level in the pumping well stabilized.

Each step-rate test was followed by a 14-hour constant-rate pumping test during which the wells were continuously pumped at the highest sustainable pumping rate as determined during the step-rate tests.

During the step-rate and constant-rate tests, water levels in the pumping well and surrounding observation wells were monitored via electronic pressure transducers. Periodic manual water level measurements were made at all pumping and observation wells to verify the accuracy of the transducer readings.

2.1.3 Recovery Monitoring

After the completion of each constant-rate test, well recovery was monitored for 24 hours. Transducers recorded continuous water level readings at all pumping and monitoring wells during the recovery period. Manual water level measurements were taken at the beginning and end of the recovery period.

Test	Pumping Well	Observation Wells	Test Dates	Step-rate Test Procedure	Constant-rate Test Procedure
Test 1	WI-CV- MW31M	WI-CV-MW01M WI-CV-MW01D WI-CV-MW02S WI-CV-MW02M WI-CV-MW20S WI-CV-MW30M	Step rate: 5/18/2020 Constant rate: 5/19/2020	Pump at a constant rate for approximately 1 hour; if water level stabilizes, increase pumping rate by 1 gallon per minute for each sequential 1-	Pump at constant rate for 14 hours; pumping rate is highest sustainable
Test 2	WI-CV- MW29M	WI-CV-MW05S WI-CV-MW05M WI-CV-MW13S WI-CV-MW13M WI-CV-MW26D	Step rate: 5/20/2020 Constant rate: 5/21/2020	pumping rate is reached at which the water level does not stabilize after 1 hour, or the well draws dry.	pumping rate as determined from the step-rate test.

Table 2-1. Summary of Aquifer Test Design

2.2 Summary of Aquifer Testing Results

Hydrographs showing pumping rates and transducer data from the WI-CV-MW31M and WI-CV-MW29M aquifer tests are provided in **Appendix A**.

2.2.1 Step-Rate Tests

The initial pumping rate for the Test 1 (WI-CV-MW31M) step-rate test was approximately 20 gallons per minute (gpm). At this rate, the well was drawn dry in approximately 3 minutes. After 90% recovery, the step-rate test was restarted with a pumping rate of approximately 3 gpm. The maximum sustainable pumping rate achieved during the test was approximately 4 gpm. At this pumping rate, the water level stabilized at approximately 16.2 feet of drawdown. No drawdown in response to pumping was observed at any of the observation wells in the Test 2 monitoring network.

The initial pumping rate for the Test 2 (WI-CV-MW29M) step-rate pumping test was approximately 7.2 gpm. At this rate, the well was drawn dry in approximately 2 minutes. After 90% recovery, the step-rate test was restarted with a pumping rate of approximately 2 gpm. The maximum sustainable pumping rate achieved during the test was approximately 2 gpm. At this pumping rate, the water level stabilized at approximately 25.4 feet of drawdown. No drawdown in response to pumping was observed at any of the observation wells in the Test 2 monitoring network.

2.2.2 Constant-Rate Tests

For the Test 1 constant-rate test, WI-CV-MW31M was pumped continuously at approximately 4.1 gpm for 14 hours. The water level at WI-CV-MW31M stabilized at approximately 17 feet of drawdown. No drawdown in response to pumping was observed at any of the Test 1 observation wells during the constant-rate pumping test.

For the Test 2 constant-rate test, WI-CV-MW29M was pumped continuously at approximately 2.2 gpm for 14 hours. The water level at WI-CV-MW29M stabilized at approximately 32 feet of drawdown. No drawdown in response to pumping was observed at any of the Test 2 observation wells during the constant-rate pumping test.

2.2.3 Discussion

The maximum sustainable pumping rates for WI-CV-MW31M and WI-CV-MW29M were insufficient to create drawdown at any of the observation wells, despite the attempt to select observation wells as close to the pumping wells as possible. To calculate estimates of aquifer properties, such as transmissivity and storativity, analyses of pumping test data require drawdown observations at wells at varying distances from the pumping well or at one observation well at multiple time during the pumping period. Because the only discernable

drawdown observed during either test was at the pumping wells, attempting to use the data to obtain estimates of aquifer properties would provide minimal value.

However, the aquifer test results were used in the development of the updated groundwater model as an additional check on the validity of the model. Refer to **Section 3** of this report for a full description of aquifer test simulations.

2.3 Geotechnical Sample Results

Soil samples were collected for geotechnical analysis during drilling of soil borings SO05 and SO06 (later completed as monitoring wells WI-CV-MW20S and WI-CV-MW21S, respectively; **Figure 2-2**). Two soil samples were collected from each soil boring. These samples were analyzed for grain size distribution, dry bulk density, total and air-filled porosity, total organic carbon, and fractional organic carbon (f_{oc}). The soil geotechnical results are presented in **Table 2-2** and **Table 2-3**. Laboratory reports with full results are provided in **Appendix B**.

Soil geotechnical properties were used to assign hydraulic and solute transport parameters in the groundwater model as described in **Section 3**.

Sample ID	Soil Type	Median Grain Size (mm)	% Gravel	% Very Coarse Sand	% Coarse Sand	% Medium Sand	% Fine Sand	% Very Fine Sand	% Silt	% Clay	
WI-CV-BH21-120-0919	Silt	0.0204	0	0	0	0	0.74	8.83	72.29	18.13	
WI-CV-BH21-140-0919	Medium Sand	0.3848	0.77	12.98	22.38	34.51	15.15	4.92	7.4	1.89	
WI-CV-BH20-120-0919	Silt	0.0248	0	0	0	0	0.98	9.2	73.55	16.27	
WI-CV-BH20-186-0919	Silt	0.0144	0	0	0	0	1.25	7.43	69.03	22.29	

Table 2-2. Soil Grain Size Distribution

Notes:

WI-CV-BH21-120-0919 was collected at a depth of 120 feet below ground surface (bgs).

WI-CV-BH21-140-0919 was collected at a depth of 140 feet bgs.

WI-CV-BH20-120-0919 was collected at a depth of 120 feet bgs.

WI-CV-BH20-186-0919 was collected at a depth of 186 feet bgs.

% = percent

mm = millimeters

Table 2-3. Soil Geotechnical Properties

Sample ID	Dry Bulk Density	Por	osity	Total Organic	Fractional
Sample ID	(g/cm ³)	Total (%)	Air-filled (%)	Carbon (mg/kg)	Organic Carbon
WI-CV-BH21-120-0919	1.68	38.3	<0.01	12,400	0.0124
WI-CV-BH21-140-0919	1.71	36	8.85	2,400	0.0024
WI-CV-BH20-120-0919	1.65	39.6	<0.01	12,400	0.0124
WI-CV-BH20-186-0919	1.67	38.6	<0.01	14,400	0.0144

Notes:

WI-CV-BH21-120-0919 was collected at a depth of 120 feet bgs. WI-CV-BH21-140-0919 was collected at a depth of 140 feet bgs. WI-CV-BH20-120-0919 was collected at a depth of 120 feet bgs. WI-CV-BH20-186-0919 was collected at a depth of 186 feet bgs. g/cm³ = grams per cubic centimeter mg/kg = milligrams per kilogram

2.4 Phase 3 Monitoring Well Installation

Phase 3 field activities were conducted in October 2020 in accordance with the SAP Addendum (CH2M, 2020a), with the drilling and installation of one monitoring well off-Base northeast of OLF Coupeville. The location of the monitoring well, WI-CV-MW18M, is on a parcel owned by Island County, and is shown on **Figure 2-2**. Two additional monitoring wells were proposed in the SAP Addendum; however, property access was not granted for the locations of these wells, and due to the task order schedule, alternate off-Base locations were not pursued in the Supplemental SI.

Due to the timing of the installation of WI-CV-MW18M, survey and water level data from this well were not incorporated into the groundwater flow or solute transport models completed for the Supplemental SI. Hydraulic data from this well will be used in future groundwater evaluation efforts, such as in the upcoming Remedial Investigation (RI) phase.

2.4.1 Property Access

Property access for the off-Base drilling was granted by the parcel owner (Island County) through a Right of Entry and Construction Agreement, executed June 24, 2020, granting Navy access to the parcel on which WI-CV-MW18M is located through 2025.

2.4.2 Archaeological Resources Monitoring

To assess for the presence of cultural or archaeological resources at the off-Base drilling location, the following actions were taken prior to and during the monitoring well installation:

- A National Historic Preservation Act Section 106 consultation was conducted with the Washington State Historic Preservation Officer and/or the Advisory Council on Historic Preservation to identify possible conflicts between historic preservation objectives and the proposed activities in the work area. No conflicts were identified, and a recommendation provided by the Naval Air Station Whidbey Island Cultural Resources Program Manager indicated a Determination of No Historic Properties Affected, with the stipulation for implementation of an unanticipated discovery plan. The Washington State Archaeologist provided concurrence with this recommendation on June 24, 2020.
- An Inadvertent Discovery Plan was generated to establish archaeological resources monitoring and inadvertent discovery protocols to be used during the ground-disturbing activities associated with the well installation.
- On-site monitoring was conducted by a professional archaeologist during ground-disturbing activities
 associated with the project, observing ground disturbances, examining borehole openings, and retrieving soil
 samples from the boring for evidence of cultural resource materials. Archaeological monitoring was
 conducted until drilling was confirmed to be at a depth below any culture-bearing deposits. At WI-CVMW18M, this depth was approximately 60 feet below ground surface (bgs).
- The archaeological monitor made a determination of no archaeological findings. The results of the archaeological monitoring are described in a technical memorandum prepared and reviewed by CH2M's professional and senior archaeologists, respectively.

The Section 106 consultation record, Inadvertent Discovery Plan, and technical memorandum describing findings during the installation of well WI-CV-MW18M are included in **Appendix C**.

2.4.3 Site Preparation and Utility Location

Prior to the initiation of drilling activities, the proposed drilling location was demarcated, and an 811 call-beforeyou-dig ticket was submitted for public utility providers. The drilling location was also scanned for utilities by Applied Professional Services Inc. (APS), a licensed third-party utility locating company. APS scanned a 25-feet radius around the well location using a combination of ground-penetrating radar and radio frequency instruments. No conflicts with utilities were identified, and the proposed well location was cleared for drilling.

2.4.4 Soil Boring and Well Installation

The borehole at WI-CV-MW18M was drilled and installed using sonic drilling techniques by a Washington-licensed driller (Yellow Jacket Drilling of Portland, Oregon) in accordance with applicable standard operating procedures (SOPs) included in the SAP and State of Washington well construction standards. The location was hand cleared to a depth of 5 feet bgs using non-invasive methods prior to drilling to ensure that undetected buried utilities were not present. Materials containing PFAS were not used during drilling. Continuous soil cores were collected for lithologic classification and screened for volatile organic compounds using a photoionization detector. Soil cores were closely examined for signs of saturation and the presence of fine-grained beds that could indicate the presence of perched groundwater or confining conditions. Lithology observed in the soil cores was classified according to the Unified Soil Classification System and logged in accordance with applicable SOPs included in the SAP. The soil boring log is included in **Appendix D**. Soil or groundwater samples were not collected for laboratory analysis during drilling.

Monitoring well WI-CV-MW18M was constructed with a 2-inch diameter, Schedule 80 polyvinyl chloride (PVC) riser connected to a 15-foot, factory slotted 0.020-inch PVC screen with a bottom cap installed from 120 to 135 feet bgs. This was a deviation from the 10-foot screen which was originally planned. A longer screen was recommended to increase the chances of installing a productive well across the water table and within water-bearing material based on the lithology observed. The field change request and approval are documented in Field Change Request No. 5, dated October 19, 2020 (**Appendix E**).

A sand filter pack (12/20 washed silica) was placed around the annular space of the well screen from the bottom of the boring extending to a minimum height of 2 feet above the top of the well screen. A bentonite seal, at least 2-feet thick, was placed above the top of the sand pack. After the bentonite had been hydrated, a cementbentonite grout was placed in the remaining annular space. Well construction materials were free of fluorine. Fluorine containing greases, bentonite, or other materials were not used. The monitoring well was finished with a flush-mount completion that included a metal well vault and concrete pad. A locking watertight cap was placed on the top of the PVC casing, and the well was labeled on the exterior of the well vault with a metal stamp indicating the well identification. A monitoring well completion diagram is provided in **Appendix D**.

2.4.5 Monitoring Well Development

Following construction, monitoring well WI-CV-MW18M was developed by the drilling subcontractor using a combination of bailing, surging, and pumping throughout the well screen in accordance with the applicable SOP included in the SAP. During monitoring well development, the CH2M field staff members measured field water quality parameters, including the potential of Hydrogen (pH), temperature, conductivity, and turbidity with a water quality meter. Well WI-CV-MW18M ran dry during development due to low recharge rates and was allowed to recharge to ensure the full screen interval was surged and bailed and then purged to the extent practicable (two total purges). Development was conducted for approximately 1.5 hours (excluding the surge and bail period). Surge blocks and pumps with Teflon parts were not used during development. Development information, including turbidity, pH, specific conductivity, temperature, and gallons of water removed were recorded as field notes. In addition, the water quality meter was calibrated prior to development, and the calibration results were recorded in the field documentation. The well development log is provided in **Appendix D**.

2.5 Investigation-derived Waste Management and Disposal

2.5.1 Phase 3

Wastes generated during the field activities were characterized as investigation-derived waste (IDW) and managed in accordance with the SAP and applicable SOPs as attached to the SAP. Wastes generated during the Phase 3 field activities included soil cuttings, well development groundwater, and decontamination rinse water

from non-disposable development equipment and heavy equipment. Approximately 65 gallons of aqueous IDW were generated and containerized in a 300-gallon polyethylene tote. Approximately 1.75 cubic yards of solid IDW were generated and containerized in stainless-steel 55-gallon drums, which were properly labeled and staged with secondary containment. During off-Base drilling, IDW containers were stored adjacent to the drilling location; following well installation and development, the liquid and solid wastes were staged at OLF Coupeville. IDW containers were inspected weekly prior to the receipt of waste characterization data and have been inspected monthly thereafter.

Following installation and development of WI-CV-MW18M, waste characterization samples were collected from the tote and drums. Solid and aqueous IDW samples were analyzed for PFAS and full Toxicity Characteristic Leaching Procedure analyses (volatile organic compounds, semivolatile organic compounds, pesticides, and inorganic constituents), ignitability, reactive cyanide, reactive sulfide, and corrosivity. The waste characterization profiles are provided in **Appendix F**. Based on the analytical results, IDW generated during Phase 3 was identified as nonhazardous, and PFAS aqueous results were less than the USEPA lifetime health advisory of 70 nanograms per liter (ng/L) for the combined sum of PFOA and PFOS. However, due to increasing difficulty in identifying facilities able to accept any PFAS-containing water for disposal, the aqueous waste required solidification prior to disposal. Transport of waste to an off-site facility in Grand View, Idaho, for solidification and disposal was conducted on August 11, 2021.



Legend

- Background Observation Well
- Test 1, Observation Well
- Test 1, Pumping Well Test 2, Observation Well
- ▲ Test 2, Pumping Well Base Boundary

Note:

Full well names include "WI-CV-" preceding the well number; however names have been abbreviated for figure presentation. OLF = Outlying Landing Field



1 inch = 0.1 mile Imagery Source: Esri

Miles

0

Figure 2-1 Aquifer Test Layout Supplemental Site Inspection Report Addendum Naval Air Station Whidbey Island - Outlying Landing Field Coupeville, Washington





Legend

- Geotechnical Sample Location Co-located with Shallow Elevation Interval Monitoring Well
- Shallow Elevation Interval Monitoring Well
- Middle Elevation Interval Monitoring Well •
- Deep Elevation Interval Monitoring Well •
- \times Keystone Well
- Base Supply Well
- Supplemental Site Investigation \bigcirc
- Monitoring Well Installation
- Soil Boring
- Building/Structure Locations
- Base Boundary

Note:

Full well names include "WI-CV-" preceding the well number; however names have been abbreviated for figure presentation. Monitoring well MW25M-R is replacement well for MW25M (GW06), which was damaged following construction and required redrilling. OLF = Outlying Landing Field



Groundwater Monitoring Well Network and Soil Boring Locations Supplemental Site Inspection Report Addendum Naval Air Station Whidbey Island - Outlying Landing Field Coupeville, Washington

Figure 2-2



1 inch = 0.3 mile Imagery Source: Esri

Numerical Modeling

The data collected during the OLF Supplemental SI field investigation were used to update and refine the Coupeville Groundwater Flow Model (CGFM), a three-dimensional (3D) numerical groundwater flow model for the OLF Coupeville area (CH2M, 2018b). This section documents the approach used to update and refine the model.

3.1 Previous Groundwater Flow Modeling

The CGFM was developed as part of the 2017-2018 expedited SI (CH2M, 2018b) as a tool to help inform groundwater flow at OLF Coupeville and to potentially assist in the analysis of future alternatives for PFAS remediation. This first iteration was constructed as a five-layer model encompassing the larger Coupeville area, extending to Puget Sound. Each model layer had approximately 86,000 active model cells, ranging in spacing from 40 to approximately 1,200 feet. The model incorporated lithologic data from boreholes at OLF Coupeville and a database of lithologic data throughout the Coupeville area to interpolate a subsurface distribution of hydraulic conductivity zones within the five-layer model.

Hydraulic parameters, including horizontal and vertical hydraulic conductivity values, groundwater recharge rates, evapotranspiration (ET) rates, extinction depth, storativity, specific yield, and conductance at the head-dependent boundaries, were optimized via autocalibration using Model-Independent Parameter Estimation (PEST) (Doherty, 2018). For each PEST iteration, the model underwent both a steady-state and a transient calibration. For the steady-state calibration, the model was calibrated to groundwater elevations measured at OLF Coupeville monitoring wells during a synoptic water level survey conducted April 15-16, 2020 (CH2M, 2021). For the transient calibration, the model was calibrated to drawdown observed at monitoring wells during the Keystone Well aquifer test. The calibration resulted in a model that provided a suitable representation of the groundwater system at OLF Coupeville, based on the understanding of the system and the available data at that time.

The model was used to estimate the effects of planned increases to the Keystone Well pumping rates from 150 to 300 gpm. This first iteration of the CGFM was configured to simulate groundwater flow only and did not include solute transport simulation capabilities. One of the uncertainties remaining following construction and calibration of the CGFM was the location of a groundwater divide on this portion of Whidbey Island. Calibration of the initial model suggested that the groundwater divide was located on OLF Coupeville. This resulted in simulated groundwater flow directions extending radially from this mound at OLF Coupeville, including easterly flow directions from the release areas. Easterly flow from potential release areas at OLF Coupeville was contradictory to the Conceptual Site Model (CSM), given that PFAS was not detected at elevated concentrations in samples collected from residential wells east of the Base.

3.2 Modeling Objectives

As described in the Supplemental SI Report (CH2M, 2021) and in Section 2 herein, field investigations were performed to confirm potential vadose zone PFAS sources and to help resolve uncertainties remaining from the previous CGFM construction/calibration effort. Groundwater level data collected from newly installed monitoring wells located in the eastern and northeastern portions of the Base indicated that the groundwater mound may be located further to the northeast than the original model suggested, and that groundwater flow from potential on-Base PFAS release areas is likely to the south/southwest rather than to the east as indicated by the previous CGFM. Furthermore, the objectives of the Supplemental SI included the development of a numerical model with solute transport capabilities, which the CGFM did not include. The objectives for updating and refining the CGFM were as follows:

• Recalibrate subsurface hydraulic parameters using newly acquired Supplemental SI data to better represent the inferred groundwater flow system at OLF Coupeville.

• Configure the model to support solute transport simulations and project future migration of PFOA and PFOS from their current locations via solute transport simulations.

The following sections describe the activities associated with the modeling effort to achieve these objectives. Because the updated model incorporates transport as well as flow simulation capabilities, the updated model will be referred to as the Coupeville Groundwater Model (CGM) to distinguish it from its predecessor, the CGFM, which simulated groundwater flow only.

3.3 Groundwater Flow Model Design Revisions

The updated CGM covers the same geographic domain and retains most of the design and construction elements of the original CGFM as detailed in the OLF Expedited SI Report (CH2M, 2018b). Furthermore, the CGM was developed using the same MODFLOW-NWT modeling code (Niswonger, et al., 2011; USGS, 2018) in conjunction with Groundwater Vistas (ESI, 2017) pre- and post-processing software package. However, the following revisions to the model design were necessary to accomplish the modeling objectives for the Supplemental SI.

- Increase the number of model layers.
- Refine and recalibrate the subsurface hydraulic parameters (hydraulic conductivity and storage).
- Update boundary conditions (wells and general head boundaries).
- Make minor adjustments to recharge and ET rates.

3.3.1 Updated Model Structure

The horizontal extent and discretization of the model grid (that is, model cell spacing) (**Figure 3-1**) was not altered from the CGFM (CH2M, 2018b). As described herein, the CGFM was constructed with five vertically stacked layers to provide a 3D representation of the subsurface system. Changes to the vertical layering of the updated CGM consisted of adding two layers by subdividing original Model Layers 4 and 5 into two layers for a total of seven model layers. This vertical refinement helped to achieve a better calibration of the groundwater flow system and was also necessary to minimize potential numerical dispersion during solute transport simulations. **Table 3-1** provides a summary of the updated model layering.

Layer	Approximate Thickness (feet)	Description
1	90	Mostly dry layer to facilitate transmission of recharge to the lower layers
2	50	Shallow groundwater zone
3	40	Intermediate groundwater zone
4	35	Deep groundwater zone
5	35	— Deep groundwater zone
6	35	Pacal aquitard
7	65	Basal ayultaru

Table 3-1. Descriptions of Coupeville Groundwater Model Layers

3.3.2 Subsurface Hydraulic Parameters

Hydraulic Conductivity

For the CGFM, initial horizontal hydraulic conductivity (K_h) values were assigned based on available lithologic information, provided by Island County, for several hundred wells within the model domain. The details by which lithologic data was translated into hydraulic conductivities are detailed in the expedited SI Report (CH2M, 2018b). Vertical hydraulic conductivity (K_v) was computed on a layer-by-layer basis using an assumed $K_h:K_v$ distribution

(that is, the ratio of horizontal to vertical hydraulic conductivity, or anisotropy ratio). K_h values and K_h:K_v were further optimized during the calibration process (CH2M, 2018b).

Autocalibration via PEST included the flexibility to independently vary both K_h and K_h:K_v at a large number of individual points over a wide range of values across the model domain. This process resulted in calibrated K_h and K_h:K_v distributions which exhibited high degrees of variability among model cells, with adjacent model cells often differing by several orders of magnitude. This had the effect of creating sporadic, localized areas of high and low groundwater elevations in the simulated flow field that were not considered representative of the actual flow system at the site (particularly in the shallower model layers). Furthermore, these highly variable K_h and K_h:K_v distributions would likely have led to numerical instability problems when conducting solute transport simulations. To help simplify the K_h and K_h:K_v distributions in the updated CGM, a smoothing process was incorporated to provide smoother transitions between areas of high and low aquifer hydraulic conductivity. K_h and K_h:K_v values were further optimized in the current calibration process, as described in more detail in subsequent sections.

Storage

The calibrated storage parameters for the CGFM were 0.12 for specific yield and 5.3x10⁻⁵ for specific storage. These parameters were further adjusted during the calibration of the updated CGM. The calibration process (described in more detail below) for the CGM yielded values of 0.2 for specific yield and 7.6x10⁻⁵ for specific storage.

3.3.3 Boundary Conditions

Boundary conditions in the updated CGM include general head boundaries (GHBs, or head-dependent boundary conditions), specified-flux boundaries, and no-flow boundaries. Changes were not made to the no-flow boundaries; however, updates were made to the GHBs and the specified-flux boundaries.

General Head Boundaries

In the CGFM, head-dependent boundaries were assigned as GHBs to model cells in immediate offshore areas as illustrated on **Figure 3-2**. The reference heads were determined by equivalent freshwater heads of the offshore water column within each head-dependent flux boundary cell. The conductance terms were initially assigned based on assumed hydraulic conductivity values for coastal sediments but were further refined during the model calibration process. For the updated CGM, the GHB reference equivalent freshwater heads were recalculated based on tide levels coinciding with the timing of the April 15-16, 2020 synoptic water level survey at OLF Coupeville. Tidal elevations were obtained from a National Oceanographic and Atmospheric Administration buoy located near Port Angeles, which is the data station nearest to OLF Coupeville for which tide data can be tied to the North American Vertical Datum of 1988 (NAVD88) elevation datum. The equivalent freshwater heads were calculated assuming a salinity of 28,500 ppm (MacCready, 2017).

Well (Specified-Flux) Boundaries

As in the CGFM, pumping wells are simulated in the model as specified-flux boundaries assigned to cells corresponding to the location and depth of operational water supply wells. The CGFM included well boundaries for the Keystone Well and two wells at the Fort Casey Well Field. Recent information from the Town of Coupeville indicates that the Fort Casey Well Field no longer operates on a regular basis and that the large majority of the Town of Coupeville's water comes from the Keystone Well (Grogan, pers. comm., 2020). Therefore, the Fort Casey Well Field was excluded from the calibration of the updated CGM; however, these wells were implemented in some post-calibration simulations. Updated steady-state pumping rates for the Keystone Well were provided by the Town of Coupeville, which indicated that the well was pumped at rates ranging from 235 to 240 gpm for 16 to 20 hours per day (a time-weighted average [continuous] pumping rate of approximately 185 gpm). Transient pumping rates for the 2018 Keystone Well aquifer test were obtained from ultrasonic flow meter readings collected during the December 2017/January 2018 Keystone Well aquifer test (CH2M, 2018b).

3.3.4 Recharge and Evapotranspiration Properties

As in the CGFM, deep percolation of precipitation (recharge) and ET rates were assigned to cells in Model Layer 1 covering the land surface (**Figure 3-2**) as specified-flux boundaries. Recharge rate zones and initial recharge rate estimates for each zone were obtained from a United States Geological Survey (USGS) study of recharge rates in Island County, Washington for water years 1998 and 1999 (USGS, 2004). The recharge and ET zones were not substantively modified between the CGFM and CGM. Recharge rates, ET rates, and ET extinction depths were refined during calibration of the original CGFM and again during calibration of the CGM.

3.4 Model Flow Recalibration

Model calibration is a process of systematically altering model input parameters to improve agreement between simulated and observed subsurface flow conditions measured in the field. This section discusses the calibration targets and results.

3.4.1 Calibration Targets

Calibration targets are the selected field-measured values that quantify hydrologic conditions of interest with consideration of data quality and reliability. CH2M used both steady-state and transient calibration targets to recalibrate the CGM. This subsection discusses the specific quantitative calibration targets selected for this effort.

Steady-state Groundwater Elevation Targets

Groundwater elevations from the Base-wide synoptic groundwater level survey conducted April 15-16, 2020 during Phase 2 of the Supplemental SI (CH2M, 2021) served as quantitative steady-state calibration targets (**Table 3-2**). Intermediate elevation zone monitoring well WI-CV-MW06M exhibits an anomalous groundwater elevation and was not considered in the calibration. Additionally, due to the complex nature of the groundwater elevation distribution in the discontinuous, perched shallow groundwater zone, accurately matching the groundwater elevation calibration, but were not considered when computing calibration statistics. A total of 27 steady-state calibration targets within Model Layers 3 through 5 were used for calibration. **Figure 3-3** shows the locations and groundwater elevations for steady-state calibration targets. These groundwater elevations represent the most current groundwater elevation data available for OLF Coupeville.

Well ID ¹	Model Layer	Groundwater Elevation ² (feet NAVD88)
WI-CV-MW01D	4	53.68
WI-CV-MW01M	3	70.39
WI-CV-MW02M	3	69.56
WI-CV-MW03D	5	51.59
WI-CV-MW03M	3	69.31
WI-CV-MW04M	3	69.29
WI-CV-MW05M	3	66.97
WI-CV-MW06M ³	3	51.27
WI-CV-MW07M	4	69.45
WI-CV-MW08M	3	82.75
WI-CV-MW09M	3	61.28
WI-CV-MW10D	4	47.03
WI-CV-MW10M	3	52.16

Table 3-2. Steady-State Calibration Targets

Well ID ¹	Model Layer	Groundwater Elevation ² (feet NAVD88)
WI-CV-MW11M	3	71.11
WI-CV-MW12D	4	26.00
WI-CV-MW13M	3	61.84
WI-CV-MW14M	3	67.44
WI-CV-MW15M	3	66.59
WI-CV-MW15S	3	66.57
WI-CV-MW16M	3	64.67
WI-CV-MW16S	3	64.68
WI-CV-MW17M	3	71.18
WI-CV-MW25M	3	68.11
WI-CV-MW26D	4	47.10
WI-CV-MW28M	3	63.64
WI-CV-MW29M	3	61.48
WI-CV-MW30M	3	67.75
WI-CV-MW31M	3	69.81

Table 3-2. Steady-State Calibration Targets

Notes:

¹ Layer 2 wells are not presented in the table as these wells were not considered in autocalibration.

² Groundwater elevations refer to the April 15-16, 2020 synoptic groundwater level survey.

³ Groundwater level measured at WI-CV-MW06M is anomalous and was not included in autocalibration.

Groundwater Flow Direction Targets

While not previously used in the calibration of the CGFM, inferred groundwater flow directions in the intermediate elevation interval were used as qualitative calibration targets for the CGM. Groundwater flow direction targets were primarily incorporated to help improve model calibration in areas where quantitative groundwater elevation targets (that is, groundwater level measurements in wells) are unavailable (primarily east of OLF Coupeville). Groundwater flow direction targets were established based on the inferred groundwater elevation contours developed from groundwater elevations from the April 15-16, 2020 synoptic groundwater level survey. Groundwater flow direction targets were placed along transects, at approximate right angles to groundwater elevation contours.

Transient Drawdown Targets

Continuous groundwater level data from ten wells (nine on-Base monitoring wells and the Keystone Well) collected during the 2017/2018 Keystone Well aquifer test (CH2M, 2018b) were used as quantitative targets for the transient CGM recalibration. The locations of the transient target wells are shown on **Figure 3-3**. To replicate the variability in groundwater levels and Keystone Well pumping rates that occurred over the 41-hour transient calibration period, it was necessary to subdivide the 41-hour period into a discrete number of model stress periods. The groundwater elevations and Keystone Well pumping rate were assumed to be constant within each stress period. As shown in **Table 3-3**, the transient conditions were simulated by subdividing the 41 hours into 12 discrete stress periods. Average groundwater elevations were calculated for each stress period and then the cumulative drawdowns from the static groundwater elevation were computed. These computed drawdowns were used as quantitative target values for the transient calibration.

	Drawdown (feet)									
Stress Period	Keystone Well	WI-CV- MW04M	WI-CV- MW04S	WI-CV- MW07M	WI-CV- MW07S	WI-CV- MW14M	WI-CV- MW15M	WI-CV- MW15S	WI-CV- MW16M	WI-CV- MW16S
2	0	0	0	0	0	0	0	0	0	0
3	6.96	0	0	0	0	0.2	0.56	0.57	1.32	1.32
4	7.72	0	0	0	0	0.32	0.69	0.71	1.54	1.54
5	8.16	0	0	0	0	0.35	0.74	0.76	1.63	1.64
6	8.51	0	0	0	0	0.35	0.75	0.77	1.68	1.69
7	8.82	0	0	0	0	0.37	0.8	0.82	1.76	1.76
8	3.45	0	0	0	0	0.33	0.48	0.49	0.88	0.91
9	6.62	0	0	0	0	0.22	0.56	0.58	1.29	1.3
10	7.27	0	0	0	0	0.25	0.64	0.66	1.44	1.45
11	7.73	0	0	0	0	0.29	0.7	0.72	1.54	1.55
12	8.17	0	0	0	0	0.33	0.76	0.78	1.65	1.65
13	8.49	0	0	0	0	0.36	0.79	0.81	1.71	1.71

Table 3-3. Transient Calibration Targets – 2017/2018 Keystone Well Aquifer Test

The results of the 2020 WI-CV-MW31M and WI-CV-MW29M aquifer tests were used to confirm the quality of model calibration. As shown in **Table 3-4a** and **Table 3-4b**, each test was divided into three stress periods representing the baseline period, the 14-hour pumping period, and the recovery period. An average constant pumping rate, based on field-measured values, was assumed over the pumping period for each test (4.1 gpm for WI-CV-MW31M and 2.2 gpm for WI-CV-MW29M).

Table 3-4a. Transient Calibration Targets – WI-CV-MW31M Aquifer Test

	Drawdown (feet)								
Stress Period	Elapsed Time (days)	WI-CV- MW31M	WI-CV- MW30M	WI-CV- MW02M	WI-CV- MW02S	WI-CV- MW20S	WI-CV- MW01M	WI-CV- MW01D	WI-CV- MW08M
1	0.1	0	0	0	0	0	0	0	0
1	0.2	0	0	0	0	0	0	0	0
1	0.276	-0.0012	0	0	0	0	0	0	0
2	0.285	16.51	0	0	0	0	0	0	0
2	0.4	16.63	0	0	0	0	0	0	0
2	0.5	16.76	0	0	0	0	0	0	0
2	0.65	16.78	0	0	0	0	0	0	0
2	0.835	16.88	0	0	0	0	0	0	0
3	0.875	-0.147	0	0	0	0	0	0	0
3	1	-0.1678	0	0	0	0	0	0	0
3	1.2	-0.1736	0	0	0	0	0	0	0
3	1.3	-0.1694	0	0	0	0	0	0	0

		Drawdown (feet)							
Stress Period	Elapsed Time (days)	WI-CV- MW29M	WI-CV- MW05M	WI-CV- MW05S	WI-CV- MW13M	WI-CV- MW13S	WI-CV- MW26D	WI-CV- MW08M	
1	0.1	0	0	0	0	0	0	0	
1	0.2	0	0	0	0	0	0	0	
1	0.265	0.0082	0	0	0	0	0	0	
2	0.285	29.31	0	0	0	0	0	0	
2	0.4	31.02	0	0	0	0	0	0	
2	0.5	31.32	0	0	0	0	0	0	
2	0.65	31.73	0	0	0	0	0	0	
2	0.834	32.23	0	0	0	0	0	0	
3	0.875	0.0276	0	0	0	0	0	0	
3	1	0.0216	0	0	0	0	0	0	
3	0.2	0.0195	0	0	0	0	0	0	
3	1.3	0.0156	0	0	0	0	0	0	

Table 3-4b. Transient Calibration Targets – WI-CV-MW29M Aquifer Test

3.4.2 Calibration Procedure

Autocalibration of the updated CGM was performed using the PEST software program (Doherty, 2018). This program was used to refine model parameters to obtain the best set of parameters to match the steady-state and transient calibration targets. Parameters that were allowed to vary within user-defined ranges during the PEST autocalibration effort were: K_h; K_h:K_v; specific yield and storage coefficient; recharge rate; ET rate and extinction depth; and hydraulic conductance at the GHBs along the island perimeter. During each PEST run, the model was run hundreds of times, with the program independently varying the assumed distributions of the model parameters listed above and seeking to minimize the error between the simulated groundwater elevations and the observed steady-state and transient calibration targets.

As described herein, the recalibration process incorporated steps to "smooth" the K_h distributions across the model domain. To accomplish this goal, a base network of pilot points was established. Pilot points are locations that are assigned a specific K_h value that PEST is able to vary over a user-defined range during calibration. In general, pilot points were distributed across the model domain to capture regional-scale variations in lithology based on the Island County and OLF Coupeville boring log information. For example, pilot points were included to represent regions of predominantly sand, silt, gravel, clay, and similar. Pilot points were also included mid-way between quantitative calibration target locations (that is, monitoring wells) to provide PEST flexibility to optimize K_h and improve calibration at a local scale. Initial K_h estimates and reasonable ranges (upper/lower bounds) of K_h values were assigned at each pilot point. During calibration, PEST modified the K_h values at one or more pilot points during a given PEST optimization iteration. Each time K_h values were modified, kriging was performed to interpolate a smooth K_h distribution across the model domain. This process was performed for each model layer independently. The other calibration parameters were optimized as follows:

- K_h:K_v ratios varied layer by layer. That is, a single K_h:K_v was assigned to each model layer (no variability across a given model layer).
- Recharge rate was allowed to vary by recharge zone (generally consistent with the zones identified in USGS, 2004). The upper bound of the recharge rate was that included in the USGS report. The exception was the OLF

Coupeville portion of the model, where PEST was given a slightly higher upper bound to the recharge rate based on the lack of trees that would serve to limit deep percolation of precipitation.

- ET rate and extinction depth were varied during the process within two zones: the OLF Coupeville portion and the remainder of the model domain.
- Specific yield and specific storage were varied on a model-wide basis. That is, a single value for specific yield and/or specific storage was included for all model layers/cells.

Because two calibration data sets (steady-state and transient) were used in the model calibration, it was necessary to run both sets of conditions through the model in a single model run so that a single set of aquifer parameters was obtained from PEST that provided the optimal match to both sets of calibration targets. This was achieved by running an initial stress period in the model that simulated steady-state conditions and attempted to match the steady-state calibration targets. This was followed by 12 stress periods assuming transient conditions that attempted to match the change in groundwater levels (that is, drawdown) that were observed during the 2017/2018 Keystone Well aquifer test.

Drawdown observations from the WI-CV-MW31M and WI-CV-MW29M aquifer tests were not used as targets for autocalibration; however, these observations were used as an additional check on the calibrated model parameters. The calibrated model parameters were implemented into separate transient simulations of the two aquifer tests, and the simulated results were compared to the observed data to verify the overall ability of the calibrated CGM to replicate the tests.

3.4.3 Calibration Results

Steady-State Groundwater Elevations

Mapped steady-state groundwater level residuals for the shallow, intermediate, and deep zones (Model Layers 2, 3, and 4, respectively) are shown on **Figure 3-4** through **Figure 3-6**. Residuals were computed as the simulated groundwater elevation minus the observed groundwater elevation; therefore, positive residuals indicate that the model is simulating high in a given area while negative residuals indicate that the model is simulating low. **Figure 3-5** and **Figure 3-6** also include simulated groundwater elevation contours for the intermediate and deep zones. Overall, strong agreement was achieved between observed and simulated groundwater elevations in the intermediate and deep zones with residuals generally less than ±2 feet at most locations. Residuals in the shallow zone (Model Layer 2) are larger (ranging from approximately 40 feet low to 30 feet high) because the CGM is not configured to simulate the complexity of a discontinuous, perched groundwater system. **Figure 3-7** shows a graph comparing observed versus simulated groundwater levels with the dark line representing a perfect match between observed and simulated levels.

Groundwater elevations in the calibrated CGM are consistent with the CSM in that the area of highest groundwater elevation, referred to as the groundwater mound, is located off-Base to the northeast (**Figure 3-5**). Additionally, to achieve the improved calibration, it was necessary to move the steady-state groundwater elevation targets corresponding to monitoring wells WI-CV-MW09M and WI-CV-MW13M from Model Layer 4 to Model Layer 3. These wells, located in the southwest portion of OLF Coupeville, are screened in a transition zone between the intermediate and deep intervals. These had previously been assigned to Model Layer 4 (deep zone) based on screen elevation; however, the groundwater elevations in these wells are more consistent with intermediate-zone groundwater elevations in Model Layer 3.

Steady-state calibration statistics are provided on **Figure 3-7**. The mean error between simulated and observed groundwater levels is -0.04 foot, and the root mean square (RMS) error is 2.13 feet (excluding WI-CV-MW06M). A key measure of calibration quality often used to evaluate groundwater models is the RMS error divided by the range of measured groundwater level data used in the calibration. For a regional-scale model, such as the CGM, a standard rule of thumb is that the RMS/range value should be less than or equal to 10 percent. The RMS/range value for the calibrated CGM (excluding the shallow zone wells and WI-CV-MW06M) is 3.8 percent, well below the target value of 10 percent, showing that the model is well calibrated.

Transient Response to Keystone Well Pumping

The second portion of calibration consisted of comparing the simulated and observed drawdown in groundwater levels created by the operation of the Keystone Well at the ten instrumented wells during the 41-hour transient calibration period. The comparisons between simulated and observed drawdowns are summarized on **Figure 3-8a** and **Figure 3-8b**. These results clearly indicate that the drawdowns predicted by the model over the transient calibration period are in very close agreement with those measured in the field during the aquifer test. The only well with significant deviation is the Keystone Well, where simulated drawdowns are less than observed drawdowns. This is to be expected as the Keystone Well was pumping during the aquifer test, and due to inefficiencies inherent in well construction, the drawdown measured in the well casing is typically much greater than the drawdown in the aquifer outside of the well. The model forecasts do not account for well inefficiency and the model distributes pumping over the entire cell (40 feet by 40 feet, as opposed to a well diameter of 12 inches); therefore, it would be expected that the model predicts a smaller magnitude of drawdown than what is measured in the well.

Simulation of WI-CV-MW31M and WI-CV-MW29M Aquifer Tests

The WI-CV-MW31M and WI-CV-MW29M aquifer tests were simulated as an additional check on the calibration of the CGM. The simulated drawdown at each well instrumented during the two tests was compared to the observed drawdown at those wells. The comparisons between simulated and observed drawdowns are summarized on **Figures 3-9a-b** and **Figures 3-10a-b**. The observation that no discernable drawdown occurred at any observation well is closely mirrored by the simulated drawdowns. Simulated drawdowns at the pumping wells are much lower than observed; however, as stated in the context of the Keystone Well aquifer test, the model does not account for well inefficiencies or the discrepancy between the well diameter and the size of the model cell to which pumping is assigned. Given that WI-CV-MW31M and WI-CV-MW29M were designed primarily as monitoring wells, a significant degree of inefficiency resulting in greater deviation between observed and simulated drawdown is not unexpected.

Calibrated Hydraulic Parameters

The autocalibration process yielded a single set of aquifer parameters and boundary conditions that provided the comparisons shown between simulated and observed groundwater levels. These sets of aquifer parameters and boundary condition properties are summarized as follows.

Figure 3-11 presents the distribution of aquifer K_h for each of the seven model layers. The K_h value for most of the aquifer material (Model Layers 2 through 4) falls between 1 and 100 feet per day, which is the range for sand to gravelly sand. The figure also shows a trend of decreasing K_h with depth, which is consistent with observations of a greater percentage of fine-grained material deeper within the aquifer system than what is seen at shallower depths.

The distribution of the magnitude of the deep percolation of precipitation (aquifer recharge) across the model domain, ranging from 0 to approximately 14 inches per year, is shown on **Figure 3-12**. This range deviates only slightly from the values reported by the 2004 USGS study (USGS, 2004) which reported a range of between 0 and 12 inches per year. The recharge zones were also not significantly modified from their original geometry as taken from the same USGS study. As expected, the deep percolation rate is higher in areas surrounding OLF Coupeville as most, if not all, of the significant vegetation has been removed in these areas, reducing the canopy interception of precipitation by leaves and allowing for higher recharge rates.

The distribution of active ET of shallow groundwater by plants is depicted on **Figure 3-13**. Due to the significant depth to groundwater over much of the model domain, the only areas where groundwater is shallow enough to be transpired directly by plants is around the model perimeter. The final ET rate simulated in the model where ET is active is approximately 30 inches per year with ET extinction depth (the depth below which ET does not occur) of 10 feet bgs.

3.4.4 Evaluation of Pre-Keystone Well Flow Field

The CGM was used in particle tracking simulations to evaluate past and present potential PFAS transport directions from the release areas east of the OLF Coupeville runway. Two total simulations were run: one under present-day pumping conditions (that is, with only the Keystone Well pumping for the Town of Coupeville municipal supply) and a second under pumping conditions as they were prior to the installation of the Keystone Well in 2008. Updated steady-state pumping rates for the Keystone Well were provided by the Town of Coupeville, which indicated that the well is pumped at rates ranging from 235 to 240 gpm for 16 to 20 hours per day, corresponding to a time-weighted average continuous pumping rate of approximately 185 gpm. Pre-2008 pumping conditions were represented with two wells pumping at the Fort Casey Well Field, southwest of OLF Coupeville. Pumping rates for the Fort Casey Well Field wells provided by the Town of Coupeville were 32 gpm for well 1-06 and 23 gpm for well 1-90. For the purposes of particle tracking, flow paths were started in the mid-point of Model Layer 2 in cells encompassing the approximate geographic area of the PFAS release areas east of the runway. Groundwater flow paths were tracked forward in time to the ultimate discharge point with an assumed effective aquifer porosity of 0.1. Figure 3-14 shows forward-tracked simulated groundwater flow paths under present-day pumping conditions. Figure 3-15 shows forward-tracked simulated groundwater flow paths under pre-2008 pumping conditions. Both simulations show that the primary groundwater flow direction from these areas is to the south (consistent with locations where elevated PFAS concentrations are present in residential drinking water wells). The simulations performed with the updated CGM indicate that there is not a significant eastward component of flow in the revised/updated numerical model; however, the model does indicate southeasterly flow toward the southeast end of the Base.

The present-day flow paths on **Figure 3-14** show some flowlines being pulled to the west, presumably due to the influence of pumping at the Keystone Well; however, the flowlines turn back to the south before reaching the Keystone Well which indicates that groundwater from the release areas is not captured by pumping at the Keystone Well, as confirmed by observations during the 2018 Keystone Well aquifer test (CH2M, 2018b). However, the modeled flowlines do indicate that there is a significant westerly component to flow directions from the release areas induced by pumping at the Keystone Well. This would suggest that groundwater flow at the on-Base release areas is influenced but not captured by pumping at the Keystone Well. The pre-2008 flow paths on **Figure 3-15** do not show any flowlines moving to the west toward the Keystone Well. Instead, all flow lines run south, with some flow being captured by the Fort Casey Wells. This would suggest that the westerly component of flow did not exist prior to 2008 and that over most of the timeframe following introduction of PFAS to the subsurface at OLF Coupeville, groundwater flow was predominantly to the south. This interpretation of historic flow direction also supports the hypothesis that the presence of PFAS in wells on the northwest end of the runway and near the Keystone Well are from a potential source separate from the sources east of the runway.

3.5 Vadose Zone Solute Transport

Vadose zone solute transport modeling was performed to simulate loading of PFOA and PFOS from vadose zone soils at on-Base release areas to the groundwater system. These simulations provide estimates of the continuous contribution of these sources to the PFOA and PFOS groundwater plumes to support predictive saturated zone solute transport modeling. The data for the development of the vadose zone model were obtained from soil borings drilled during Phase 1 of the OLF Coupeville Supplemental SI (CH2M, 2021). Data from monitoring well WI-CV-MW20S were used to inform subsurface conditions near the Building 2709 release area, and data from monitoring well WI-CV-MW21S were used in a similar fashion to assign model parameters near the Facilities 1, 2, and 11 release area.

3.5.1 Code Selection

The analysis was performed using HYDRUS-1D for groundwater flow and solute transport (Šimůnek et al., 2013). HYDRUS-1D numerically solves the Richards equation for variably saturated flow and advection-dispersion equations for solute transport in one dimension (1D). The HYDRUS-1D code was selected for the following reasons:

- HYDRUS-1D is in the public domain, a product of more than 10 years of development, is in wide use, and is well supported and documented.
- HYDRUS-1D provides the option of simulating dual-domain transport processes. This allows for the inclusion of the effects of back-diffusion of contaminant mass from hydraulically isolated mass storage zones in the subsurface (dead-end pore space), which tends to prolong the persistence of contaminant source areas.

3.5.2 Grid Construction

1D vertical soil profiles were constructed for each vadose zone source (that is, a single profile for WI-CV-MW20S and a single profile for WI-CV-MW21S). The simulated soil profile lengths represent the depth from ground surface to the water table in each of the release areas, which were 95 and 100 feet bgs for WI-CV-MW20S and WI-CV-MW21S, respectively. The 95 to 100-foot vadose zone profiles were discretized into model cells of equal thickness of 0.1 foot for a total of 950 and 1,000 cells, respectively.

3.5.3 Subsurface Hydraulic Parameters

Lithologic information observed in the soil boring logs for WI-CV-MW20S and WI-CV-MW21S were used to assign soil types (that is, sand, silt, clay, gravel, and similar) within the soil profiles (see CH2M, 2021, for soil boring logs). Soil boring logs indicate that the vadose zone underlying the potential soil source is variable, ranging from clays to gravels. **Table 3-5** summarizes the soil-specific parameters assigned to the vadose zone profiles for general soil classes. These general soil classes encompass variations for the Unified Soil Classification System (that is, sands include well graded, poorly graded, and silty sands, and similar). Soil-specific parameters were derived from sitespecific geotechnical samples (**Table 2-3**), the default soil property catalog included in HYDRUS-1D (Carsel and Parrish, 1998), or literature values.

Parameter	Clays	Silts ¹	Sands	Gravels	Source
Residual soil water content, mobile domain (-)	0.068	0.034	0.045 to 0.065	0.01 to 0.02	Carsel and Parrish (1988)
Residual soil water content, immobile domain (-)	0	0	0	0	Carsel and Parrish (1988)
Saturated Hydraulic Conductivity (m/d)	0.048ª	0.06ª	1.061 to 7.128ª	86.4 to 432 ^b	^a Carsel and Parrish (1988) ^b Freeze and Cherry (1979)
Total Porosity (-)	0.45 ^b	0.37ª	0.355ª	0.30 ^b	^a Laboratory derived (Table 2-3) ^b Freeze and Cherry (1979)
Mobile Porosity	0.1	0.1	0.1	0.1	Laboratory derived (Table 2-3)
Immobile Porosity	0.35	0.27	0.255	0.2	Computed (total porosity minus mobile porosity)
van Genuchten's alpha (m ⁻¹)	0.8ª	1.6ª	7.5 to 14.5ª	16 to 20 ^b	^a Carsel and Parrish (1988) ^b Šimůnek (2016)
van Genuchten's n (-)	1.09ª	1.37ª	1.89 to 2.68ª	2.9 to 3.0 ^b	^a Carsel and Parrish (1988) ^b Šimůnek (2016)
Tortuosity (-)	0.5	0.5	0.5	0.5	Carsel and Parrish (1988)
Soil bulk density (g/cm ³)	1.4575 ^b	1.67ª	1.71ª	1.855 ^b	^a Laboratory derived (Table 2-3) ^b Computed from total porosity via Equation 1
Longitudinal dispersivity (m)	1	1	1	1	Assumed
Fraction of organic carbon (-)	0.00773	0.00773	0.00773	0.00773	Laboratory derived (Table 2-3), average

Table 3-5. HYDRUS-1D Soil-Specific Input Parameters

Parameter	Clays	Silts ¹	Sands	Gravels	Source
Mass transfer coefficient for moisture (days ⁻¹)	0.86	0.86	0.86	0.86	Assumed, derived from Šimůnek, J., M.T. et.al. (2008)

Notes:

а

and ^b designations for a given parameter correlate to the reference for the value in the associated Source column.

¹ Includes sandy silts

g/cm³ = grams per cubic centimeter

m = meters

m/d = meters per day

Equation (1): Bulk Density = (1 – Total Porosity) * Particle Density (assumed to be 2.65 g/cm³)

3.5.4 Solute Transport Parameters

HYDRUS-1D was set up to solve the advection-dispersion transport equation with dual-domain mass transfer to simulate PFOA and PFOS transport in the vadose zone within the Building 2709 and Facilities 1, 2, and 11 release areas adjacent to WI-CV-MW20S and WI-CV-MW21S, respectively. The dual-domain transport formulation involves advection-dispersion in the mobile domain and diffusion to/from the immobile domain (that is, dead-end pore space). This formulation was implemented to more accurately account for transport processes with the goal of improving the predictive capabilities over what would have been achieved with a traditional single-domain transport formulation. Solute-specific input parameters are listed in Table 3-6 and were primarily derived from the literature. Because PFAS constituents are generally conservative (that is, not susceptible to biodegradation) and non-volatile, parameters associated with these processes were omitted from the transport simulations. Additionally, the soil organic carbon-water partition coefficient (K_{oc}) is generally used to simulate the interaction between the solute and the subsurface organic aquifer solids. For the purposes of PFOA and PFOS transport, K_{oc} is considered an "effective" adsorption term, controlling the interaction between the solutes at the air-water interface as well as the interaction between the solutes and the subsurface organic materials. There is still a great deal of uncertainty associated with the adsorptive properties of PFAS which can be important to fate and transport in some lithologies; however the approach described herein uses current estimates of overall K_{oc} values for PFAS in variably saturated conditions developed by the scientific community for modeling PFAS transport.

PFOA	PFOS	Source	
108	568	Brusseau (2018)	
0.8352	4.39253	Computed as $K_{oc} * f_{oc}$	
0	0	Assumed to be negligible for PFOA/PFOS	
4.67 x 10 ⁻⁵	4.67 x 10 ⁻⁵	Guo, et. al. (2020)	
0	0	Assumed to be negligible for PFOA/PFOS	
0	0	Assumed to be negligible for PFOA/PFOS	
4.56 x 10 ⁻⁵	4.56 x 10 ⁻⁵	Computed as 1/emplacement time (assumed to be 60 years [21,915 days])	
	PFOA 108 0.8352 0 4.67 x 10 ⁻⁵ 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	PFOA PFOS 108 568 0.8352 4.39253 0 0 4.67 x 10 ⁻⁵ 4.67 x 10 ⁻⁵ 0 0 0 0 4.67 x 10 ⁻⁵ 4.67 x 10 ⁻⁵ 4.67 x 10 ⁻⁵ 4.67 x 10 ⁻⁵ 0 0 4.56 x 10 ⁻⁵ 4.56 x 10 ⁻⁵	

Notes:

 K_d = Distribution coefficient

K_{oc} = Soil organic carbon-water partition coefficient

m²/d = square meters per day

mL/g = milliliters per gram

3.5.5 Initial Concentrations

Initial PFOA and PFOS soil concentrations in the simulated soil profiles are based on PFAS analytical results of soil samples collected from soil borings SO01 through SO06 (a total of 31 soil samples). For a given release area, the maximum PFOA or PFOS concentration among the three soil borings for a given depth interval was assigned to the HYDRUS-1D profile. For example, the PFOS concentration in the 0.5 to 1.0 foot bgs sample interval at the Facilities 1, 2, and 11 release area (adjacent to WI-CV-MW21S) was 802,000 nanograms per kilogram (ng/kg) at SO04 and 4,920 ng/kg at SO06 (CH2M, 2021). The higher of the two available results for this sample depth interval was assigned to the HYDRUS-1D profile. For computational purposes, non-detect results were assigned a concentration equal to one-half the reporting limit. Assigned concentrations were assumed to extend at a constant concentration from the mid-point between the sample above to the mid-point of the sample below (that is, no interpolation of concentrations between consecutive discrete sample depths). Initial PFOA and PFOS concentrations for the WI-CV-MW20S and WI-CV-MW21S HYDRUS-1D profiles are presented in **Table 3-7** and **Table 3-8**, respectively. The initial concentration profiles indicate that PFOA and PFOS concentrations in the sample intervals directly above the water table (near the bottom of the profiles) are approximately 2 to 3 orders of magnitude lower than the maximum concentrations observed at shallower depths.

Depth (feet bgs)	PFOA Concentration (ng/kg)	PFOS Concentration (ng/kg)	
0-0.9	555	51,300	
1.0 - 7.0	4,100	101,000	
7.1 - 18.0	560	34,700	
18.1 - 24.0	1,075	19,900	
24.1 - 31.5	535	535	
31.6 – 39.9	505	9,890	
40.0 - 44.9	1,085	60,000	
45.0 – 59.5	3,850	44,800	
59.6 - 72.0	1,090	478,000	
72.1 – 76.9	810	20,100	
77.0 – 86.0	1,020	1,020	
86.1 – 93.5	990	5,370	
93.6 – 95.0	1,260	1,260	

Table 3-7. Initial Soil Concentration, WI-CV-MW20S (Building 2709 Release Area)

Table 3-8. Initial Soil Concentration, WI-CV-MW21S (Facilities 1, 2, and 11 Release Area)

Depth (feet bgs)	PFOA Concentration (ng/kg)	PFOS Concentration (ng/kg)
0.0 - 1.5	4,590	802,000
1.6 - 2.9	71,700	23,900
3.0 – 7.5	2,410	936,000
7.6 – 18.0	870	136,000
18.1 – 25.5	520	16,900
25.6 - 33.0	1,900	520
33.1 - 44.4	575	575
44.5 - 53.5	8,340	402,000

Depth (feet bgs)	PFOA Concentration (ng/kg)	PFOS Concentration (ng/kg)
53.6 - 59.9	74,700	33,100
60.0 - 66.5	23,100	102,000
66.6 - 71.5	1,640	12,500
71.6 – 75.4	2,940	560
75.5 – 85.0	10,900	560
85.1 - 93.9	1,440	550
94.0 - 100	9,470	570

Table 3-8. Initial Soil Concentration, WI-CV-MW21S (Facilities 1, 2, and 11 Release Area)

3.5.6 Boundary Conditions

The upper boundary condition of each HYDRUS-1D profile was specified as a constant flux, reflecting the deep percolation of precipitation at the site. The value assigned to each profile (approximately 13.5 inches per year) was obtained from the calibrated CGM model described in Sections 3.1 through 3.4. The bottom boundary of the model was assigned a constant pressure head of 0 feet to represent the water table.

Solute transport boundary conditions at the upper boundaries were set to a concentration flux of zero based on the assumption that additional PFOA and/or PFOS will not be released. The solute transport boundary condition at the lower boundaries was set to a zero-concentration gradient.

3.5.7 Time Discretization

The model was designed to simulate steady-state hydraulic conditions and a 100-year solute transport timeframe. To establish steady-state moisture conditions in the vadose zone, each profile was initially parameterized with the values reported in **Table 3-5** and initial conditions described in Sections 3.5.5 and 3.5.6. The HYDRUS-1D models were then run for a 100-year timeframe. The resultant pressure head profile at the end of this simulation was assumed to represent steady-state conditions in the vadose zone. These pressure head profiles were input as initial conditions to a second simulation for each HYDRUS-1D profile and the simulations were run for a 100-year period to estimate future transport of PFOA and PFOS.

3.5.8 Results

Figure 3-16 and **Figure 3-17** present the simulated PFOA and PFOS concentrations reaching the water table over time within the Building 2709 and Facilities 1, 2, and 11 release areas adjacent to WI-CV-MW2OS and WI-CV-MW21S, respectively. Model output based on the parameterization of the HYDRUS-1D profiles suggest a time lag in the arrival of peak PFOA and/or PFOS concentrations at the water table beneath both release areas. As shown in **Table 3-7** and **Table 3-8**, relatively lower concentrations of PFOA and/or PFOS concentrations at the higher PFOA and/or PFOS concentrations at shallower depths to migrate through the vadose zone to the water table. This result is inconsistent with the observation of elevated PFAS concentrations already present in the underlying groundwater in these areas.

As shown on **Figure 3-16**, the maximum concentration of PFOA is simulated as reaching the water table after approximately 10 to 15 years of transport. The simulated maximum concentration reaching the water table at well WI-CV-MW20S (the Building 2709 release area) is estimated to be approximately 3,000 ng/L, while the maximum concentration at well WI-CV-MW21S (the Facilities 1, 2, and 11 release area) is nearly 18,000 ng/L. The differences in the simulated concentrations reaching the water table are a function of lower PFOA concentrations in samples collected at soil borings in the Building 2709 release area adjacent to WI-CV-MW20S as compared to

those collected in borings from the Facilities 1, 2, and 11 release area adjacent to WI-CV-MW21S (**Table 3-7** and **Table 3-8**).

HYDRUS-1D simulations show that the maximum PFOS concentrations are forecast to reach the water table after approximately 45 to 70 years of transport (**Figure 3-17**). The longer delay in the arrival of peak PFOS concentrations, as compared to PFOA, is a result of the higher K_{oc} value assigned for PFOS (meaning that PFOS is more strongly adsorbed to organic matter and at air-water interfaces in the vadose zone than PFOA). Maximum concentrations of PFOS of approximately 37,000 and 17,000 ng/L are simulated to reach the water table within the release areas adjacent to WI-CV-MW20S and WI-CV-MW21S, respectively. These higher concentrations are consistent with the higher concentrations of PFOS in soil samples as compared to PFOA. The "plateau" of the simulated PFOS curve for the Facilities 1, 2, and 11 release area adjacent to WI-CV-MW21S is a result of the high PFOS concentrations (over 800,000 ng/kg) within the upper 10 feet of the soil profile. The HYDRUS-1D results suggest that this mass was still reaching the water table after 100 years of transport and that breakthrough had not yet occurred.

3.6 Saturated Zone Solute Transport Model

3.6.1 Code Selection

Fate and transport of PFOA and PFOS in the saturated zone was simulated using MT3D-USGS (USGS, 2016). MT3D-USGS is a modular 3D transport model for the simulation of advection, dispersion, and chemical reactions of dissolved constituents within groundwater systems. MT3D-USGS is used in conjunction with MODFLOW-2005 in a step-wise groundwater flow and transport simulation. Groundwater elevations and cell-by-cell flux terms are computed by MODFLOW-NWT during the flow simulation and are then read by MT3D-USGS and used as the flow field for the transport portion of the simulation.

3.6.2 Model Grid and Parameterization

PFOA and PFOS solute transport was simulated using the CGM grid and revised/recalibrated hydraulic input parameters (that is, K_h, boundary conditions, and similar) described in Sections 3.3 and 3.4. Consistent with the vadose zone modeling described herein, solute transport in the saturated zone was simulated with a dual-porosity formulation assuming no biodegradation or volatilization. Total porosity of 0.355 and mobile porosity of 0.1 (consistent with site-specific geotechnical samples for sand shown in Table 2-3) were assigned to the entire model domain. Available literature suggests that the "effective" Koc for PFOS in saturated systems is lower than in the vadose zone due to the absence of processes such as sorption at the air-water interface. The understanding of the transport properties of PFAS is continually evolving as research on the topic continues. As such, a wide range of K_{oc} values is reported in the literature. For the purposes of this evaluation, the K_{oc} of PFOA and PFOS were assigned as 120 milliliters per gram (mL/g) and 370 mL/g, respectively (USEPA, 2017). Using an average sitespecific f_{oc} of 0.0077 (derived from the average silt [0.013] and sand [0.0024] f_{oc} values listed in **Table 2-3**), this equates to K_d values of approximately 0.93 mL/g and 2.87 mL/g. A bulk density of 1.71 grams per cubic centimeter was assigned to the entire model domain. The PFAS plume is assumed to have emplaced approximately 60 years ago. Given this assumption, a mass transfer coefficient of 4.56 x 10⁻⁵ days⁻¹ was computed using the formula: mass transfer coefficient = 1/emplacement time (days) (Haggarty et al., 2004). This estimate of emplacement time was selected to be conservative, reflecting the earliest reasonable time frame for when aqueous film-forming foam containing PFAS would be available for use by the Navy. A formal sensitivity analysis of the influence that the assumed emplacement time (and therefore mass transfer coefficient) has on simulated plume migration rates and extents will be conducted as part of the RI effort planned for OLF. Longitudinal, transverse, and vertical dispersivities were assumed to be 100, 10, and 1 foot, respectively, throughout the model domain. Dispersivity values are based on professional judgement for plumes of similar scale and lithology.

3.6.3 Solute Boundary Conditions and Initial Concentrations

Initial concentration distributions of PFOA and PFOS in groundwater at OLF Coupeville were interpreted based on PFAS concentrations from analytical data from Phase 2 of the OLF Coupeville Supplemental SI (CH2M, 2021). These included PFAS concentrations from depth-discrete groundwater grab samples collected from soil borings and samples from monitoring wells. For locations where a depth-discrete grab sample was collected from an interval coinciding with the monitoring well screen interval, the higher of the two concentrations was used in the interpolation. The initial PFOA and PFOS distributions also incorporated analytical data from off-Base residential well samples. The most recent analytical result (collected between 2016 and 2020) for a given residential well was included (CH2M, 2019b, 2020b).

Analytical results were grouped according to the aquifer elevation interval of the sample (shallow, intermediate, and deep). Two-dimensional interpolation was performed for each of the three aquifer elevation intervals to obtain an initial concentration distribution of both PFOA and PFOS. The shallow zone initial concentrations were applied to Model Layer 2, intermediate-zone initial concentrations were applied to Model Layer 3, and the deep-zone initial concentrations were applied to Model Layer 3, and the deep-initial concentrations were applied to Model Layers 4 and 5. **Figures 3-18a-c** and **Figures 3-19a-c** show the initial concentrations in Model Layers 2 through 5 for PFOA and PFOS, respectively.

Available data do not suggest the presence of PFOA or PFOS deeper than Model Layer 5; therefore, initial concentrations in Model Layers 6 and 7 were set to zero. Initial concentrations pertain to PFAS concentrations in the saturated zone only; therefore, initial concentrations in Model Layer 1 were also set to zero, as that layer is mostly dry.

To simulate the continuous loading of PFOA and PFOS from vadose zone soils within the release areas, results from the HYDRUS-1D simulations were incorporated in the saturated zone solute transport model as mass-flux boundary conditions. Mass flux of PFOA and PFOS were implemented using the Groundwater Vistas analytic well package. Analytic wells were assigned to each model cell encompassing the assumed approximate geographic extent of the release areas adjacent to WI-CV-MW20S and WI-CV-MW21S (a total of 15 and 20 wells, respectively). The "wells" were simulated as inflow to the groundwater system at a rate equal to simulated flow at the bottom (that is, leaching from the vadose zone) of each HYDRUS-1D profile (approximately 13.5 inches per year). The groundwater recharge property was set to zero over these areas, so as not to double count the amount of deep percolation of precipitation. PFOA and PFOS concentrations assigned to the analytic wells were assigned based on the HYDRUS-1D results presented on Figure 3-16 and Figure 3-17. The HYDRUS-1D outputs were simplified to 5-year time-steps over which concentrations were assumed to be constant using the simulated PFAS concentration at the end of the time period. For example, for simulation years 0 to 5, PFOA concentrations of approximately 2,000 and 7,000 ng/L were assigned to the WI-CV-MW20S and WI-CV-MW21S-adjacent areas, respectively (representing the simulated concentration at the water table at year 5), and years 5 to 10 were assigned concentrations of 3,000 and 13,500 ng/L (the simulated concentration at the water table at year 10). The mass-flux boundary conditions (analytic wells) were assigned to Model Layer 2 to represent leaching of vadose zone release areas to the water table.

3.6.4 Time Discretization

Similar to the vadose zone model, the saturated zone simulations were designed to simulate steady-state hydraulic conditions and a 100-year solute transport timeframe. Each simulation consisted of 20, 5-year stress periods. Hydraulic properties and boundary conditions were constant (to simulate steady-state groundwater flow conditions), while the PFOA and PFOS concentrations varied for each stress period.

3.6.5 Results

Figures 3-18a-c and **Figures 3-19a-c** present the simulated distributions of PFOA and PFOS in the shallow, intermediate, and deep elevation intervals at discrete time periods. Figures for both constituents present the initial (current) concentration distributions, as well as the simulated concentrations after 5, 25, 50, 75, and 100 years of future transport (that is, into the future from current).

As shown on **Figure 3-18a**, PFOA concentrations in the shallow elevation interval underlying the release areas currently exceed 500 ng/L. The impact of ongoing leaching of PFOA from the vadose zone release areas is apparent after 5 years of transport, expressed as increasing PFOA concentrations. As the simulation period progresses, the extent of elevated concentrations emanating from the vadose zone release areas is projected to expand, with concentrations exceeding 100 ng/L extending west of the runway. The footprint of the diffuse plume (exceeding 10 ng/L) expands over time in the general direction of groundwater flow to the south/southwest. The simulated extent of the plume exceeding 10 ng/L is not projected to reach Admiralty Bay after 100 years of transport given the current configuration of hydraulic and solute transport parameters. Similar trends are projected for the intermediate and deep elevation intervals, as presented on **Figure 3-18b** and **Figure 3-18c**.

Figure 3-19a presents the simulated distribution of PFOS over time in the shallow elevation interval. These data suggest that mass contribution from vadose zone release areas is not readily apparent until more than 25 years of transport. While PFOS is present in the intermediate and deep elevation intervals throughout the simulation period, reflective of currently observed concentrations, the influx of mass from the release areas does not reach groundwater in the intermediate and deep elevation intervals until 50 and nearly 100 years of transport, respectively (**Figure 3-19b** and **Figure 3-19c**). This highlights a data gap that exists between the observed concentrations in groundwater and the concentrations observed in the soil profiles at release areas. The overall footprint of the PFOS plume exceeding 10 ng/L is not projected to extend beyond the Base boundaries (with the exception of a small area currently present near the western boundary) after 100 years of transport. The lack of PFOS transport is a result of the higher K_{oc} value of the constituent as compared to PFOA, indicating that PFOS is less mobile. The lack of widespread simulated PFOS extents in the groundwater system is consistent with the general lack of elevated concentrations currently observed in both monitoring wells and off-Base residential wells.

3.7 Model Limitations

Models are inherently inexact because the mathematical description of the physical realm is imperfect, and the understanding of interrelated physical processes is incomplete. Mathematical models like the CGM can only approximate subsurface processes, despite their high degree of precision. A major cause of uncertainty in these types of models is the discrepancy between the coverage of measurements needed to understand subsurface conditions and the coverage of measurements generally made under the constraints of limited time and budget. The spatial scale and complex physical environment at and around OLF Coupeville present specific challenges and limitations. A relatively small reservoir of field data has been collected at OLF Coupeville. A significant degree of uncertainty exists in the distribution of subsurface conditions. However, the available data were deemed to be sufficient to provide enough detail of the physical system for the CGM to achieve the modeling objectives described in Section 3.2. It is expected that as more data are collected, the model will be refined and improved.

Additionally, the scientific understanding of the solute transport behavior of PFAS constituents, specifically PFOA and PFOS, is still in its infancy, and much more information is expected to be learned in coming years. The parameterization of solute transport in the CGM is based on the best information currently available; however, as the science develops and understanding improves, the solute transport element of the CGM is expected to be updated, resulting in increased confidence in the results.

Given these assumptions and limitations, numerical groundwater models like CGM should be considered insight tools and qualitative predictors of future conditions. Therefore, important planning decisions that use output from CGM must be made with an understanding of the uncertainty in and sensitivity to model input parameters and should consider other site data, professional judgment, and the inclusion of safety factors. Warranties associated with the forecasts, explicit or implied, are not provided.





- Well Boundary Cell
- -Road
- Model Extent
- General Head Boundary Cell Recharge and Evapotranspiration Cell Could Standing Field

Notes: NAVD88 = North American Vertical Datum of 1988 OLF = Outlying Landing Field Boundary Conditions Naval Air Station Whidbey Island Coupeville, Washington

0.75 1 inch = 1.5 miles Ν Imagery Source: ©2018 ESRI


Legend

- Middle Elevation Interval Monitoring Well

- Deep Elevation Interval Monitoring Well
 Community Drinking Water Well
 Keystone Well Aquifer Test Observation Well
- Base Boundary

Notes:

Groundwater elevations data are relative to feet above the North American Vertical Datum of 1988
 Full well names include "WI-CV-" preceding the well number; however names have been abbreviated for figure presentation.



1 inch = 0.3 mile Imagery Source: Esri

Figure 3-3 Calibration Targets Naval Air Station Whidbey Island Coupeville, Washington















Naval Air Station Whidbey Island Coupeville, Washington



LEGEND

Δ

0

*Statistics exclude Model Layer 2 targets and MW06M.



MW16S 190 feet from Pumping Well





MW16M 190 feet from Pumping Well



LEGEND



– – Simulated Drawdown

Figure 3-8a Simulated versus Observed Response to Pumping of the Keystone Well Naval Air Station Whidbey Island Coupeville, Washington









NG0412170816VBO Figure_3-10a_TimeDrawdown_MW31M_rev1



LEGEND

---- Observed Drawdown

Simulated Drawdown

Figure 3-9b Simulated versus Observed Response to Pumping of WI-CV-MW31M Naval Air Station Whidbey Island Coupeville, Washington





NG0412170816VBO Figure_3-9a_TimeDrawdown_MW29M_rev1





LEGEND

— Observed Drawdown

Simulated Drawdown

Figure 3-10b Simulated versus Observed Response to Pumping of WI-CV-MW29M Naval Air Station Whidbey Island Coupeville, Washington











Note: OLF = Outlying Landing Field

1 inch = 1.5 miles Imagery Source: ©2018 ESRI



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NOTIFICATION: FIGURE 3-15 CONTAINS SENSITIVE BUT UNCLASSIFIED INFORMATION WHICH IS PROTECTED BY THE FREEDOM OF INFORMATION ACT

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Notes:

1. ng/L = nanograms per liter

2. PFOA = perfluorooctanoic acid

Figure 3-16 Simulated PFOA Transport from the Vadose Zone Naval Air Station Whidbey Island Coupeville, Washington





Notes:

1. ng/L = nanograms per liter

2. PFOS = perfluorooctanesulfonic acid

Figure 3-17 Simulated PFOS Transport from the Vadose Zone Naval Air Station Whidbey Island Coupeville, Washington





NOTIFICATION: FIGURE 3-18a CONTAINS SENSITIVE BUT UNCLASSIFIED INFORMATION WHICH IS PROTECTED BY THE FREEDOM OF INFORMATION ACT

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NOTIFICATION: FIGURE 3-18b CONTAINS SENSITIVE BUT UNCLASSIFIED INFORMATION WHICH IS PROTECTED BY THE FREEDOM OF INFORMATION ACT

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NOTIFICATION: FIGURE 3-18c CONTAINS SENSITIVE BUT UNCLASSIFIED INFORMATION WHICH IS PROTECTED BY THE FREEDOM OF INFORMATION ACT

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NOTIFICATION: FIGURE 3-19a CONTAINS SENSITIVE BUT UNCLASSIFIED INFORMATION WHICH IS PROTECTED BY THE FREEDOM OF INFORMATION ACT

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NOTIFICATION: FIGURE 3-19b CONTAINS SENSITIVE BUT UNCLASSIFIED INFORMATION WHICH IS PROTECTED BY THE FREEDOM OF INFORMATION ACT

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NOTIFICATION: FIGURE 3-19c CONTAINS SENSITIVE BUT UNCLASSIFIED INFORMATION WHICH IS PROTECTED BY THE FREEDOM OF INFORMATION ACT

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SECTION 4 Conclusions and Recommendations

The groundwater flow model, previously developed during the OLF Coupeville Expedited SI (CGFM), was updated, recalibrated, and configured to simulate solute transport. The effort included a steady-state calibration to more recent groundwater elevations from new and existing monitoring wells and a transient calibration to groundwater elevation data and pumping rates from the 2017-2018 Keystone Well aquifer test (CH2M, 2018b) and the 2020 Supplemental SI Phase 2 aquifer tests. The groundwater flow model is well calibrated, with calibration statistics that meet or exceed all industry standards. The conclusions and recommendations from this effort are summarized herein.

The primary conclusions from the modeling effort described herein are as follows:

- Simulated groundwater elevations in the CGM are consistent with observations at intermediate and deep elevation interval monitoring wells throughout OLF Coupeville.
- Simulated flow directions in the CGM, particularly in the intermediate elevation interval, are to the south/southwest. These flow directions are consistent with groundwater elevation data provided by newly installed wells along the eastern Base boundary which supports the overall CSM for groundwater flow at/near the Base.
- Simulated groundwater flow directions in the CGM are consistent with the current CSM, indicating that pumping at the Keystone Well influences local groundwater flow directions but does not capture groundwater impacted by PFAS from the on-Base release areas east of the runway.
- Simulation results suggest that groundwater flow directions had a more southerly orientation at the time of emplacement of PFAS contamination at OLF Coupeville (before installation of the Keystone Well) than they have currently, and that the current westward component of flow is largely a result of the Keystone Well pumping.
- The calibrated flow model adequately simulates the results of the 2020 Supplemental SI Phase 2 aquifer tests.
- The simulated PFOA and PFOS plume migration is consistent with the CSM and observations of elevated PFOA concentrations in residential drinking water wells south of OLF Coupeville.
- Continued mass flux from vadose zone PFAS releases has a strong influence on future simulated plume migration extent and persistence.

Several uncertainties regarding groundwater flow and PFAS migration at OLF Coupeville remain. Addressing these uncertainties will be one of the primary objectives of the upcoming RI planned for OLF Coupeville. These uncertainties are summarized as follows:

- Groundwater elevations east of OLF Coupeville remain an uncertainty. The CGM was recalibrated, with a
 primary objective of improving the representation of groundwater flow directions along the eastern boundary
 of OLF Coupeville in the intermediate elevation interval to be more consistent with the lack of any PFAS
 detections in drinking water wells east of the Base. While groundwater elevation data from newly installed
 on-Base monitoring wells suggest that these refined flow directions are reasonable, there remains a lack of
 off-Base groundwater elevation data to constrain the model calibration. Additionally, the CSM inference that
 there is not significant flow from OLF Coupeville to the east is largely based on the lack of elevated PFAS in
 residential well samples east of the Base collected in 2016.
- Groundwater elevations west of OLF Coupeville are uncertain, and additional data in these areas would significantly improve understanding of the groundwater flow regime.
- Vadose zone solute transport simulations suggest a delay in the arrival of peak PFOA and PFOS concentrations at the water table (between 5 and 50 years into the future). This is a result of relatively lower concentrations

of PFOA and PFOS in soil samples near the water table and higher concentrations shallower in the soil profiles (that is, it would take time for the higher concentrations to be leached to the water table). The projected delay in the arrival of PFOA and PFOS at the water table is inconsistent with the current presence of elevated PFOA and PFOS concentrations in groundwater underlying the release areas along with the large spatial extent of groundwater plumes at the site, particularly the PFOA plume. Additional source area characterization is recommended in the upcoming RI.

- Based on model projections and the lack of elevated PFOA in the WI-CV-MW03S/M/D well cluster, elevated
 concentrations of PFOA near the Keystone Well do not appear to have been transported from the release
 areas east of the runway. The evaluation of additional potential release areas, such as the area west of the
 runway near the Keystone Well, requires additional investigation.
- Additional data are needed to reconcile the lower on-Base PFAS concentrations near the southern Base boundary with higher off-Base PFAS concentrations at residential wells to the south.
- The science regarding PFAS solute transport parameters continues to evolve, and projections of future plume migration are expected to need to be refined as more definitive data become available. The simulated persistence and extent of the PFOA and PFOS plumes presented in this report are heavily influenced by the assigned K_{oc} values in the vadose and saturated zones. Large ranges for these parameters are reported in the literature. Assuming lower values than those assumed herein would result in greater simulated migration extents of these constituents, while assuming higher values would result in more limited simulated migration extents. Future solute transport modeling will incorporate PFAS solute transport parameter values based on additional studies/publications as they become available.
- The regulatory environment regarding PFAS is also expected to evolve in the coming years, and these changes will need to be considered as future decisions are made regarding remediation activities, if any, at OLF Coupeville.

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Appendix A Aquifer Test Hydrographs



NG0412170816VBO Figure_A-1_AqTst_Hydrographs



NG0412170816VBO Figure_A-2_AqTst_Hydrographs



NG0412170816VBO Figure_A-3_AqTst_Hydrographs

ch2m:



NG0412170816VBO Figure_A-4_AqTst_Hydrographs



NG0412170816VBO Figure_A-5_AqTst_Hydrographs



NG0412170816VBO Figure_A-6_AqTst_Hydrographs



NG0412170816VBO Figure_A-7_AqTst_Hydrographs


NG0412170816VBO Figure_A-8_AqTst_Hydrographs





NG0412170816VBO Figure_A-10_AqTst_Hydrographs

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NG0412170816VBO Figure_A-11_AqTst_Hydrographs



NG0412170816VBO Figure_A-12_AqTst_Hydrographs

ch2m:

Coupeville, Washington





WI-CV-MW31M Pumping Rate

WI-CV-MW29M Pumping Rate

Manual Groundwater Elevation

Pumping versus Time – WI-CV-MW08M Supplemental Site Investigation Report Addendum Naval Air Station Whidbey Island – Outlying Landing Field Coupeville Coupeville, Washington



NG0412170816VBO Figure_A-14_AqTst_Hydrographs

Appendix B Outlying Landing Field Site Inspection Phase 1 Soil Geotechnical Results



Petroleum Services Division 3437 Landco Dr. Bakersfield, California 93308 Tel: 661-325-5657 Fax: 661-325-5808 www.corelab.com

November 18, 2019

Rachel Clennon Jacobs 1100 112th Ave. NE., Suite 500 Bellevue, WA 98004

Subject: OLF Coupeville Project: OLF SI PHASE 1 CL File No: 1903854

Dear Ms Clennon:

The attached file presents the final physical properties determination results for the soil samples submitted from your OLF SI PHASE 1 Project.

Appropriate ASTM, EPA or API methodologies were used for this project and SOP's are available on request. The samples for this project are currently in storage and will be retained for thirty days past completion of testing at no charge. At the end of thirty days, the samples will be disposed. You may contact me regarding continued storage, disoposal, or return of the samples.

Thank you for this opportunity to be of service to Jacobs . Please do not hesitate to contact us at (661-325-5657) if you have any questions regarding these results or if we can be of any additional service.

Sincerely, Core Laboratories LP

En M. Signy

Eva Lopez Core Analyst

The analyses, opinions or interpretations contained in this report are based upon observations and material supplied by the client for whose exclusive and confidential use this report has been made. The interpretations or opinions expressed represent the best judgment of Core Laboratories. Core Laboratories assumes no responsibility and makes no warranty or representations, expressed or implied, as to the productivity, proper operations or profitableness, however, of any oil, gas, coal or other mineral, property, well or sand in connection with which such report is used or relied upon for any reason whatsoever.





Physical Properties Data

Petroleum Services

Core Lab File No.: 1903854

Jacobs

Project Name: OLF SI PHASE 1 Project Number: 9000NVT1

API RP 40 Walkley-Black **METHODS: ASTM D2937** Dry Bulk Porosity Total Organic Fractional Total² Air Filled³ Organic Carbon Sample Sample¹ Density Carbon ID. Orientation %Vb⁴ %Vb ⁴ g/cc g/g mg/kg V WI-CV-BH21-120-0919 1.68 38.3 <0.01 1.24E-02 12400 WI-CV-BH21-140-0919 V 1.71 36.0 8.85 2400 2.40E-03 WI-CV-BH20-120-1019 <0.01 V 1.65 39.6 12400 1.24E-02 WI-CV-BH20-186-1019 V 38.6 1.67 < 0.01 14400 1.44E-02

(1) Sample Orientation: H = horizontal; V = vertical.

(2) Total Porosity = no pore fluids in place; all interconnected pore channels.

(3) Air Filled Porosity= pore channels not occupied by pore fluids.

(4) Vb = Bulk Volume, cc.



SIEVE and LASER PARTICLE SIZE SUMMARY

(METHODOLOGY: ASTM D422/D4464M)

Petroleum Services

Company: Jacobs Project Name: OLF SI PHASE 1 Project Number: 9000NVT1

CL File No.: 1903854 Date: 11/18/2019

	Grain Size	Median				Compor	nent Perce	entages			
	Description**	Grain Size,				Sand Size					Silt &
Sample ID	(Mean from Folk)	mm	Gravel	VCoarse	Coarse	Medium	Fine	VFine	Silt	Clay	Clay
WI-CV-BH21-120-0919	Silt	0.0204	0.00	0.00	0.00	0.00	0.74	8.83	72.29	18.13	90.42
WI-CV-BH21-140-0919	Medium Grain Sand	0.3848	0.77	12.98	22.38	34.51	15.15	4.92	7.40	1.89	9.29
WI-CV-BH20-120-1019	Silt	0.0248	0.00	0.00	0.00	0.00	0.98	9.20	73.55	16.27	89.82
WI-CV-BH20-186-1019	Silt	0.0144	0.00	0.00	0.00	0.00	1.25	7.43	69.03	22.29	91.31





		Particle	e Size Distrib	ution				Sorting Statistic	s (Folk)	
		Diam	eter		Wei	ght %	Parameter	Trask	Inman	Folk
	[US Mesh]	[in.]	[mm]	[\$]	[Incl.]	[Cum.]	i arameter	Husk	minan	1 OIK
	5/8 in	0.625000	15 87500	-4.00	0.000	0.00	Median		Silt sized	
	3/8 in	0.375000	9 50000	-3.25	0.000	0.00	Wedian		Jill Sizeu	
Gravel	4	0.187008	4.75000	-2.25	0.000	0.00	(in)	0.0008	0.0008	0.0008
	6	0.131890	3.35000	-1.75	0.000	0.00				
	8	0.092913	2.36000	-1.25	0.000	0.00	(mm)	0.0204	0.0204	0.0204
	10	0.078740	2.00000	-1.00	0.000	0.00				
V Cree	12	0.066212	1.68179	-0.75	0.000	0.00	Mean		Silt sized	
Sand	14	0.055078	1.41421	-0.30	0.000	0.00	(in)	0 0009	0.0005	0.0006
Gana	18	0.039370	1.00000	0.00	0.000	0.00	(,	0.0000	0.0000	0.0000
	20	0.033106	0.84090	0.25	0.000	0.00	(mm)	0.0240	0.0133	0.0153
Coarse	25	0.027839	0.70711	0.50	0.000	0.00			_	
Sand	30	0.023410	0.59460	0.75	0.000	0.00	Sorting		Poor	
	35	0.019685	0.50000	1.00	0.000	0.00		0.601	1 070	1 000
Medium	40	0.010000	0.42045	1.25	0.000	0.00		2.031	1.970	1.003
Sand	50	0.011705	0.29730	1.75	0.000	0.00	Skewness	St	ronalv fine ske	wed
	60	0.009843	0.25000	2.00	0.000	0.00				
	70	0.008277	0.21022	2.25	0.000	0.00		0.780	0.527	0.333
Fine	80	0.006960	0.17678	2.50	0.002	0.00	Kurtesia			
Sand	100	0.005852	0.14865	2.75	0.122	0.12	Kurtosis		Platykurtic	
	140	0.004921	0.12500	3.00	1.067	1.81	· []	0 301	0 505	0.870
V. Fine	170	0.003480	0.08839	3.50	1.421	3.23		0.001	0.000	0.070
Sand	200	0.002926	0.07433	3.75	2.311	5.54		Component Perce	entages	
	230	0.002461	0.06250	4.00	4.033	9.58	Gravel Sand	Silt	Clay	Silt + Clay
	270	0.002069	0.05256	4.25	5.949	15.53	0.00 0.50	70.00	40.40	00.40
	325	0.001740	0.04419	4.50	7.107	22.69	0.00 9.58	72.29	18.13	90.42
	450	0.001230	0.03125	5.00	6.749	36.72				
Silt	500	0.001035	0.02628	5.25	5.956	42.68	Percentile		Particle Diamet	er
	635	0.000870	0.02210	5.50	5.169	47.85	[Weight, %]	[in.]	[mm]	[phi]
		0.000732	0.01858	5.75	4.582	52.43 56.65	5	0.0031	0.0776	3 6872
		0.000517	0.01314	6.25	3.945	60.59	5	0.0001	0.0770	0.0072
		0.000435	0.01105	6.50	3.630	64.22	10	0.0024	0.0618	4.0164
		0.000366	0.00929	6.75	3.334	67.56	16	0.0000	0.0520	4 0650
		0.000308	0.00781	7.00	2 952	73.62	16	0.0020	0.0520	4.2005
		0.000217	0.00552	7.50	2.837	76.46	25	0.0017	0.0420	4.5747
		0.000183	0.00465	7.75	2.746	79.20				= 1000
		0.000154	0.00391	8.00	2.666	81.87	40	0.0011	0.0285	5.1323
		0.000129	0.00328	8.50	2.333	86.82	50	0.0008	0.0204	5.6122
		0.000091	0.00232	8.75	2.210	89.03				
Clav		0.000077	0.00195	9.00	1.994	91.03	70	0.0003	0.0081	6.9426
,		0.000065	0.00164	9.25	1.769	92.79	75	0.0002	0.0061	7 2662
		0.000034	0.00138	9.50	1.352	95 70	75	0.0002	0.0001	7.3003
		0.000038	0.00098	10.00	1.163	96.86	84	0.0001	0.0034	8.2056
		0.000032	0.00082	10.25	0.987	97.85				
		0.000027	0.00069	10.50	0.808	98.66	90	0.0001	0.0021	8.8660
		0.000023	0.00049	11.00	0.434	99.71	95	0.0001	0.0013	9.6155
		0.000016	0.00041	11.25	0.231	99.94				
		0.000015	0.00038	11.50	0.056	100.00	**All Grain Sizes Classed U	Ising Wentworth Scale		
								-		





		Particl	e Size Distrik	oution			Sc	orting Statistics	s (Folk)	
		Dian	neter		Weig	ght %	Parameter	Trask	Inman	Folk
	[US Mesh]	[in.]	[mm]	[•]	[Incl.]	[Cum.]	i di di litetei	Hask	mman	TOIR
	5/8 in	0.625000	15 87500	-4.00	0.000	0.00	Median	м	odium sand si	red.
	3/8 in.	0.375000	9.50000	-3.25	0.000	0.00	Median	IVI	euluin sanu siz	Leu
Gravel	4	0.187008	4.75000	-2.25	0.000	0.00	(in)	0.0152	0.0152	0.0152
	6	0.131890	3.35000	-1.75	0.000	0.00				
	8	0.092913	2.36000	-1.25	0.383	0.38	(mm)	0.3848	0.3848	0.3848
	10	0.078740	2.00000	-1.00	0.383	0.77	Maan			
V Crse	12	0.066212	1.08179	-0.75	2.880	3.05	Mean	IVI	edium sand siz	zea
Sand	16	0.046819	1.18921	-0.25	3.360	10.12	(in)	0.0174	0.0143	0.0146
	18	0.039370	1.00000	0.00	3.629	13.75	()			
	20	0.033106	0.84090	0.25	4.058	17.81	(mm)	0.4408	0.3622	0.3696
Coarse	25	0.027839	0.70711	0.50	4.801	22.61	Continu		Deen	
Sand	30	0.023410	0.59460	0.75	5.907 7.558	28.57	Sorting		Poor	
	40	0.016553	0.42045	1.00	8 873	45.00		1 736	1 332	1 636
Medium	45	0.013919	0.35355	1.50	9.377	54.38			11002	
Sand	50	0.011705	0.29730	1.75	8.819	63.20	Skewness		Finely skewed	
	60	0.009843	0.25000	2.00	7.437	70.64		0.004	0.004	0.017
Fino	70	0.008277	0.21022	2.25	5.730	76.37		0.991	0.884	0.217
Sand	100	0.005852	0.14865	2.30	3 008	83 55	Kurtosis		Verv leptokurti	c
	120	0.004921	0.12500	3.00	2.241	85.79		1		
	140	0.004138	0.10511	3.25	1.700	87.49		0.197	1.404	1.649
V. Fine	170	0.003480	0.08839	3.50	1.308	88.80		_		
Sand	200	0.002926	0.07433	3.75	1.040	89.84	Consulation Consulation	omponent Perce	ntages	
	230	0.002461	0.06250	4.00	0.669	90.71	Gravel Sand	SIII	Ciay	Silt + Clay
	325	0.001740	0.04419	4.50	0.700	92.17	0.77 89.94	7.40	1.89	9.29
	400	0.001463	0.03716	4.75	0.651	92.82				
Silt	450	0.001230	0.03125	5.00	0.603	93.43	Dercentile		Partiala Diamat	~*
	635	0.001035	0.02020	5.25	0.558	94 50	[Weight, %]	fin.1	[mm]	en Inhil
		0.000732	0.01858	5.75	0.486	94.99				(Jeen 1
		0.000615	0.01562	6.00	0.457	95.44	5	0.0616	1.5657	-0.6468
		0.000517	0.01314	6.25	0.428	95.87	10	0.0471	1 1071	-0.2596
		0.000366	0.00929	6.75	0.366	96.63	10	0.0471	1.1371	-0.2330
		0.000308	0.00781	7.00	0.338	96.97	16	0.0359	0.9117	0.1334
		0.000259	0.00657	7.25	0.314	97.29	25	0.0001	0.0000	0.5054
		0.000217	0.00552	7.50	0.293	97.58 97.85	25	0.0261	0.6620	0.5951
		0.000154	0.00391	8.00	0.259	98.11	40	0.0183	0.4653	1.1037
		0.000129	0.00328	8.25	0.243	98.36	50	0.0450		4 0770
		0.000109	0.00276	8.50	0.229	98.58	50	0.0152	0.3848	1.3778
01		0.000077	0.00232	9.00	0.214	99.00	70	0.0100	0.2541	1.9768
Clay		0.000065	0.00164	9.25	0.184	99.18				
		0.000054	0.00138	9.50	0.168	99.35	75	0.0087	0.2197	2.1863
		0.000046	0.00116	9.75	0.152	99.50 99.63	84	0.0057	0 1439	2 7968
		0.000032	0.00082	10.25	0.115	99.75	07	0.0007	0.1400	2.7500
		0.000027	0.00069	10.50	0.095	99.84	90	0.0028	0.0721	3.7930
		0.000023	0.00058	10.75	0.073	99.92	05	0.0007	0.0195	5 7560
		0.000019	0.00049	11.25	0.050	99.99	90	0.0007	0.0105	5./ 502
		0.000015	0.00038	11.50	0.006	100.00	**All Grain Sizes Classed Lie	ng Wentworth Scale		
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		Particle	e Size Distrib	ution			Soi	ting Statistics	s (Folk)	
		Diam	neter		Weig	ght %	Parameter	Trask	Inman	Folk
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	5/8 in	0.625000	15 87500	-4 00	0.000	0.00	Median		Silt sized	
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	6	0.131890	3.35000	-1.75	0.000	0.00				
	8	0.092913	2.36000	-1.25	0.000	0.00	(mm)	0.0248	0.0248	0.0248
	10	0.078740	2.00000	-1.00	0.000	0.00	Mean		Silt sized	
V Crse	14	0.055678	1.41421	-0.50	0.000	0.00	mouri		Ont Sized	
Sand	16	0.046819	1.18921	-0.25	0.000	0.00	(in)	0.0010	0.0006	0.0007
	18	0.039370	1.00000	0.00	0.000	0.00				
Coores	20	0.033106	0.84090	0.25	0.000	0.00	(mm)	0.0258	0.0144	0.0172
Sand	25 30	0.027839	0.59460	0.50	0.000	0.00	Sorting		Poor	
cuna	35	0.019685	0.50000	1.00	0.000	0.00				
	40	0.016553	0.42045	1.25	0.000	0.00		2.505	1.906	1.839
Medium	45	0.013919	0.35355	1.50	0.000	0.00				
Sand	50	0.011705	0.29730	1.75	0.000	0.00	Skewness	Str	ongly fine ske	wed
	70	0.009843	0.23000	2.00	0.000	0.00		0 717	0.653	0 419
Fine	80	0.006960	0.17678	2.50	0.011	0.01		0.1.11	0.000	01110
Sand	100	0.005852	0.14865	2.75	0.225	0.24	Kurtosis		Mesokurtic	
	120	0.004921	0.12500	3.00	0.745	0.98				
V Eine	140	0.004138	0.10511	3.25	1.093	2.07		0.309	0.534	0.904
Sand	200	0.003480	0.08839	3.50	2 369	5.40	Co	mnonent Perce	ntages	
Gana	230	0.002461	0.06250	4.00	4.333	10.18	Gravel Sand	Silt	Clay	Silt + Clay
	270	0.002069	0.05256	4.25	6.708	16.89				
	325	0.001740	0.04419	4.50	8.492	25.38	0.00 10.18	73.55	16.27	89.82
	400	0.001463	0.03716	4.75	8.770 7.809	34.15 41.96				
Silt	500	0.001035	0.02628	5.25	6.291	48.25	Percentile	P	Particle Diamet	er
	635	0.000870	0.02210	5.50	4.937	53.19	[Weight, %]	[in.]	[mm]	[phi]
		0.000732	0.01858	5.75	4.099	57.29	F	0.0021	0.0704	2 6556
		0.000517	0.01302	6.25	3.436	64.40	5	0.0031	0.0794	3.0000
		0.000435	0.01105	6.50	3.209	67.61	10	0.0025	0.0630	3.9887
		0.000366	0.00929	6.75	3.001	70.61	40	0.0004	0.0500	1.01.10
		0.000308	0.00781	7.00	2.837	73.45 76.16	16	0.0021	0.0539	4.2143
		0.000217	0.00552	7.50	2.612	78.77	25	0.0018	0.0446	4.4878
		0.000183	0.00465	7.75	2.523	81.30				
		0.000154	0.00391	8.00	2.439	83.73	40	0.0013	0.0327	4.9331
		0.000129	0.00328	8.50	2.172	88.23	50	0.0010	0.0248	5.3337
		0.000091	0.00232	8.75	1.992	90.22				
Clay		0.000077	0.00195	9.00	1.793	92.01	70	0.0004	0.0096	6.6954
		0.000065	0.00164	9.25	1.588	93.60	75	0.0003	0.0071	7 1377
		0.000046	0.00116	9.75	1.208	96.20	10	0.0000	0.0071	1.1011
		0.000038	0.00098	10.00	1.035	97.23	84	0.0002	0.0038	8.0265
		0.000032	0.00082	10.25	0.875	98.11 98.82	90	0.0001	0.0024	8 7202
		0.000027	0.00058	10.75	0.548	99.37	30	0.0001	0.0024	0.7202
		0.000019	0.00049	11.00	0.380	99.75	95	0.0001	0.0014	9.5016
		0.000016	0.00041	11.25	0.201	99.95				
		0.000015	0.00036	11.50	0.049	100.00	**All Grain Sizes Classed Usin	g Wentworth Scale		





		Particle	e Size Distrib	oution			So	ting Statistics	s (Folk)	
		Diam	eter	-	Weig	ght %	Parameter	Trask	Inman	Folk
	[US Mesh]	[in.]	[mm]	[\$]	[Incl.]	[Cum.]	i aramotor	Huok	IIIIIaii	1 Olix
	5/8 in	0.625000	15 87500	-4.00	0.000	0.00	Median		Silt sized	
	3/8 in.	0.375000	9.50000	-3.25	0.000	0.00	modium		Ont Dized	
Gravel	4	0.187008	4.75000	-2.25	0.000	0.00	(in)	0.0006	0.0006	0.0006
	6	0.131890	3.35000	-1.75	0.000	0.00				
	8	0.092913	2.36000	-1.25	0.000	0.00	(mm)	0.0144	0.0144	0.0144
	10	0.066212	1.68179	-0.75	0.000	0.00	Mean		Silt sized	
V Crse	14	0.055678	1.41421	-0.50	0.000	0.00				
Sand	16	0.046819	1.18921	-0.25	0.000	0.00	(in)	0.0008	0.0004	0.0005
	18	0.039370	1.00000	0.00	0.000	0.00	()	0.0407	0.0140	0.0400
Coarse	20	0.033106	0.84090	0.25	0.000	0.00	(mm)	0.0197	0.0112	0.0122
Sand	30	0.023410	0.59460	0.75	0.000	0.00	Sorting		Poor	
	35	0.019685	0.50000	1.00	0.000	0.00				
	40	0.016553	0.42045	1.25	0.000	0.00		2.768	2.060	1.974
Medium	45 50	0.013919	0.35355	1.50	0.000	0.00	Skowness	1	Finaly skowoo	1
Sanu	60	0.009843	0.25000	2.00	0.000	0.00	ORCWICSS		T IIICIY SKewet	
	70	0.008277	0.21022	2.25	0.000	0.00		0.875	0.301	0.189
Fine	80	0.006960	0.17678	2.50	0.017	0.02	Keerica	-		
Sand	100	0.005852	0.14865	2.75	0.298	0.31	Kurtosis		Platykurtic	
	140	0.004921	0.12500	3.00	1.328	2.58		0 265	0.512	0.869
V. Fine	170	0.003480	0.08839	3.50	1.472	4.05		0.200	0.012	0.000
Sand	200	0.002926	0.07433	3.75	1.872	5.93	Co	mponent Perce	ntages	
	230	0.002461	0.06250	4.00	2.760	8.69	Gravel Sand	Silt	Clay	Silt + Clay
	325	0.002069	0.05256	4.25	4.860	12.55	0.00 8.69	69.03	22.29	91.31
	400	0.001463	0.03716	4.75	5.453	22.86				
Silt	450	0.001230	0.03125	5.00	5.602	28.46	Bergentile		antiala Diamat	
	635	0.000870	0.02626	5.25	4.830	38.60	[Weight, %]		[mm]	er Íphil
		0.000732	0.01858	5.75	4.570	43.17			[]	
		0.000615	0.01562	6.00	4.591	47.76	5	0.0032	0.0813	3.6210
		0.000517	0.01314	6.25	4.621	52.30	10	0.0023	0.0591	4 0803
		0.000366	0.00929	6.75	4.069	60.85		0.0020	0.0001	
		0.000308	0.00781	7.00	3.758	64.61	16	0.0018	0.0466	4.4230
		0.000259	0.00657	7.25	3.507	68.11 71 44	25	0.0014	0.0349	4 8404
		0.000183	0.00465	7.75	3.186	74.62		0.0014	0.0010	
		0.000154	0.00391	8.00	3.090	77.71	40	0.0008	0.0210	5.5722
		0.000129	0.00328	8.25 8.50	2.977	80.69	50	0.0006	0.0144	6 1159
		0.000091	0.00232	8.75	2.637	86.16		0.0000	010111	011100
Clay		0.000077	0.00195	9.00	2.412	88.57	70	0.0002	0.0060	7.3865
-		0.000065	0.00164	9.25 9.50	2.169	90.74 92.67	75	0.0002	0.0046	7 7783
		0.000046	0.00116	9.75	1.707	94.37		0.0002	0.0010	
		0.000038	0.00098	10.00	1.490	95.86	84	0.0001	0.0027	8.5426
		0.000032	0.00082	10.25	1.283	97.15	90	0.0001	0.0017	9,1603
		0.000023	0.00058	10.75	0.828	99.04		0.000.	0.0011	0.1000
		0.000019	0.00049	11.00	0.579	99.62	95	0.0000	0.0011	9.8500
		0.000015	0.00038	11.50	0.076	100.00	**All Grain Sizes Classed Usin	a Wentworth Scale	1	1
								5 5		

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Project Name	Container	0.5 ft sleeve	0.5 ft sleeve	0.5 ft sleeve	0.5 ft sleeve				
Location OLF Coupeville Project Number 9000NVT1	Preservatives:	≤6°C	≤ 6°C	≤ 6°C	≤ 6°C				
Project Manager R. Clennon/J. Madsen	Filtered:	NA	NA	NA	NA			6	
Sample Manager Tiffany Hill	Holding Time:	28	28	28	28				
Task Order CTO 4405 Project OLF SI PHASE 1 Turnaround Time 28 Days Shipping Date: 10/28/2019 COC Number: CORE_1028	TIME Matrix	Dry Bulk Density (ASTM D2937)	Fractional Organic Carbon (Walkley Black)	Grain Size (ASTM D422)	Total Porosity (API RP40)		Number of Containers	COM	IMENTS
WI-CV-BH21-120-0919 9/10/2019	14:10 Soil	x	х	x	х		1		
WI-CV-BH21-140-0919 9/10/2019	17:00 Soil	x	x	x	x		1		
WI-CV-BH20-120-1019 10/23/2019	17:30 Soil	x	x	x	x		1		
WI-CV-BH20-186-1019 10/24/2019	15:50 Soil	x	x	x	x		1		
				11.		TOTAL NUMBER OF CONTAINERS	4		

Gamples arrived without ice C 59°F

	Signatures	Date/Time	Shipping Details		Special Instructions:
Approved by	-ARTI	- de d-	Method of Shipment: FedEx	ATTN:	- Email report to:
Sampled by	Der Pere	1201,00			Rachel.Clennon@iacobs.com:
Relinquished by T			On Ice: Veg / no	Sample Custody	Tiffany.Hill@jacobs.com
Received by	Lower 10	29/19 10:00	Airbill No: 7768 3105 1972	and	Travis.Pitts@jacobs.com
Relinquished by			Lab Name: Core Laboratories	Larny Kunkol	
Received by			Lab Phone: (661) 325-5657	Larry Numker	Report Copy to
					Jennifer.Madsen@jacobs.com
					(425) 233-3293

Appendix C State Historic Preservation Office Section 106 Concurrence Letter, Outlying Landing Field Coupeville Archaeological Monitoring and Treatment Plan, and Archaeological Monitoring Technical Memorandum



June 24, 2020

Ms. Elizabeth Ellis Naval Air Station Whidbey Island 3730 North Charles Porter Avenue Oak Harbor, Washington 98278-5000

> Re: Groundwater Monitoring Wells Project Log No.: 2019-04-02954-USN

Dear Ms. Ellis;

Thank you for contacting our department. We have reviewed the materials you provided for the proposed Groundwater Monitoring Wells Project at Outlying Field (OLF) Coupeville, Naval Air Station Whidbey Island, Island County, Washington.

We concur with your Determination of No Historic Properties Affected with the stipulation for for an unanticipated discovery plan.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and the concerned tribes and this department notified.

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D. State Archaeologist (360) 586-3080 email: *rob.whitlam@dahp.wa.gov*





Naval Facilities Engineering Command Northwest Silverdale, Washington

Final

Archaeological Monitoring and Treatment Plan Supplemental Site Investigation Phase 3 Outlying Landing Field Coupeville

Naval Air Station Whidbey Island Oak Harbor, Washington

October 2020



Naval Facilities Engineering Command Northwest Silverdale, Washington

Final

Archaeological Monitoring and Treatment Plan Supplemental Site Investigation Phase 3 Outlying Landing Field Coupeville

Naval Air Station Whidbey Island Oak Harbor, Washington

October 2020

Prepared for NAVFAC Northwest by CH2M HILL, Inc. Bellevue, Washington Contract N62470-16-D-9000 CTO 4405



Contents

Acrony	ms and <i>I</i>	Abbreviations	vii
1	Introdu	ction	1-1
	1.1	Site Description	1-1
2	Archaeo	blogical Monitoring Methods	2-1
	2.1	Treatment of Cultural Resources	2-1
3	Monito	ring Plan Summary	3-1
4	Inadver	tent Discovery Plan	4-1
	4.1	Inadvertent Discovery of Cultural Resources	4-1
	4.2	Inadvertent Discovery of Human Remains	4-1
5	Referer	ices	5-1

Appendix

А	Monitoring Contact Information

Figure

1 Proposed Off-Base Well Location

Acronyms and Abbreviations

CH2M	CH2M HILL, Inc.
CTO	Contract Task Order
DAHP	Department of Archaeology and Historic Preservation
NASWI	Naval Air Station Whidbey Island
NAVFAC	Naval Facilities Engineering Command
Navy	Department of the Navy
NRHP	National Register of Historic Places
OLF	Outlying Landing Field
PFAS	per- and polyfluorinated substances
SAP	Sampling and Analysis Plan
SI	Site Investigation
TBD	to be determined
THPO	Tribal Historic Preservation Office

Introduction

The purpose of this Archaeological Monitoring and Treatment Plan is to establish archaeological resources monitoring and inadvertent discovery protocols to be used during ground-disturbing activities associated with the Supplemental Site Investigation (SI) Phase 3 field effort, to be conducted adjacent to Outlying Landing Field (OLF) in Coupeville, Washington in Island County. The Supplemental SI will include sections on archaeological monitoring methods, a monitoring plan summary, and an inadvertent discovery plan; and pertinent contact information for monitoring, stakeholder, and Department of the Navy (Navy) personnel.

1.1 Site Description

OLF Coupeville is a military airfield associated with Naval Air Station Whidbey Island (NASWI). It was commissioned for use by the Navy in 1943 and provides support for day and night Field Carrier Landing Practice operations by the Navy for aircraft based out of NASWI. Such operations allow aviators and crew to fly in patterns as well as practice touch-and-go, simulating carrier landings, and take offs. During these practice runs, jet aircraft approach the runway and touch down, immediately taking off again and looping around the field to prepare for another landing and takeoff.

Field efforts described herein are conducted as Phase 3 of the Supplemental SI, as described in the Sampling and Analysis Plan (SAP) Addendum (Navy, 2020), and will consist of installation of one monitoring well on a parcel northeast of OLF Coupeville owned by Island County. The parcel is situated in Section 1 of Township 31, Range 1E, Willamette Base and Meridian (Figure 1). CH2M HILL, Inc. (CH2M) is performing this investigation on behalf of Naval Facilities Engineering Command (NAVFAC) Northwest. As the lead federal agency, NAVFAC Northwest conducted consultation in accordance with Section 106 of the National Historic Preservation Act for the project (State of Washington Department of Archaeology and Historic Preservation [DAHP], 2020).

SECTION 2 Archaeological Monitoring Methods

CH2M will provide oversight of an onsite professional archaeologist during ground-disturbing activities associated with the project. The onsite archaeological monitor will observe ground disturbances, examining borehole opening and retrieved soil samples from the boring for evidence of cultural resource materials while maintaining a safe distance from drilling equipment. The archaeological monitor may request drilling activities be temporarily halted as necessary to allow photography and recovery of materials and data. Any soil sample material may be screened at the discretion of the monitor. The archaeological monitor will be prepared with the basic equipment needed to perform site documentation, evaluation, and recovery of any cultural materials identified. Archaeological monitoring will continue until drilling is confirmed to be at a depth below any culture-bearing deposits. The archaeological monitor will safety protocols required of personnel conducting drilling activities.

The archaeological monitor will prepare daily field monitoring verification reports, noting observations, results, and actions taken, as necessary, concerning the monitoring activities. Photographs will be taken to record the drilling activities as well as the character and provenance of any identified cultural resources. A technical memorandum detailing the results of the archaeological monitoring during the Phase 3 Supplemental SI will be prepared to fully document the results of the monitoring in accordance with Section 106 of the National Historic Preservation Act and the DAHP regulations subsequent to completion of drilling activities.

2.1 Treatment of Cultural Resources

If pre-contact or historic-period archaeological materials and/or features are encountered during the course of monitoring activities, all work will halt, and NAVFAC Northwest and the DAHP will be notified immediately. The treatment of the archaeological materials and their potential National Register of Historic Places (NRHP) eligibility will be determined by NAVFAC Northwest and DAHP through coordination with the consulting parties at that time. If avoidance of the resource is not feasible under project constraints, additional mitigation, including but not limited to NRHP-eligibility test excavations and/or data recovery excavations, may be required. A supplemental treatment plan and/or DAHP Archaeological Excavation Permit may be required if potentially NRHP-eligible cultural resources are encountered and cannot be avoided. The archaeological monitor will ensure that an area large enough to protect the integrity of the resource is avoided by drilling and well construction activities until the appropriate treatment measures are met. Drilling activities will continue in the area once the treatment of the resource is complete.

SECTION 3 Monitoring Plan Summary

- CH2M will provide an archaeological monitor to be on site during ground-disturbing activity (monitoring well drilling) associated with the project.
- The archaeological monitor may request that drilling activities be halted temporarily as necessary to allow photography and recovery of materials and data.
- The archaeological monitor will prepare daily field monitoring verification reports, noting observations, results, and actions taken, as appropriate, concerning the monitoring efforts.
- Digital photographs will be taken to record the construction activity, as well as the character and provenance of any identified cultural resources.
- If potentially NRHP-eligible archaeological materials and/or features are encountered during the course of
 monitoring activities, all work will halt, and CH2M's archaeological monitor/field team will contact NAVFAC
 Northwest and DAHP. NAVFAC Northwest and DAHP will determine the treatment of the archaeological
 materials through coordination with the consulting parties at that time. Drilling may continue in the area once
 all interested parties have been consulted and consensus of the approach to treatment of the resource is
 reached.
- CH2M will submit a technical memorandum detailing the results of the archaeological monitoring for dissemination to the consulting parties at the conclusion of the project.
- If potential human remains are encountered during any phase of the project, all work in the area will halt and the protocols described in the following section will be implemented.

Inadvertent Discovery Plan

The following section details the procedures, which will be followed in the event that drilling activities associated with the Supplemental SI inadvertently encounter cultural resources or human remains.

4.1 Inadvertent Discovery of Cultural Resources

Prior to commencement of project activities, the drilling subcontractor will be prepared for the possibility of encountering prehistoric and/or historic archaeological materials during ground-disturbing activities. In the event that drilling activities associated with the SI encounter cultural resources (that is, intact shell midden deposits, lithic reduction sites, former hearth features, historic-period refuse deposits and/or privy features, or human remains), including archaeological artifacts, features, and/or sites, all work will halt, and NAVFAC Northwest and the DAHP will coordinate the treatment of the materials with the consulting parties. Work will not proceed until notification to proceed is granted by the lead federal agency. Compliance with all applicable laws pertaining to archaeological resources is required. CH2M will complete appropriate DAHP State of Washington Inventory Forms for any identified cultural resources and will submit the completed forms to DAHP for assignment of a Smithsonian Trinomial.

4.2 Inadvertent Discovery of Human Remains

If human remains are encountered during the Supplemental SI field work, CH2M will immediately contact the following entities: NAVFAC Northwest, the Island County Coroner, the Island County Sheriff, and the DAHP State Physical Anthropologist. The following protocol will be applied:

If ground-disturbing activities encounter human skeletal remains during the course of construction, all activity
that may cause further disturbance to those remains will cease. The area of the find will be secured and
protected from further disturbance until the State provides notice to proceed. The finding of human skeletal
remains will be reported to the county medical examiner/coroner and local law enforcement in the most
expeditious manner possible. The remains will not be touched, moved, or further disturbed. The county
medical examiner/coroner will assume jurisdiction over the human skeletal remains and make a
determination of whether those remains are forensic or non-forensic. If the county medical examiner/coroner
determines the remains are non-forensic, they will report that finding to the DAHP), who will then take
jurisdiction over the remains. The DAHP will notify any appropriate cemeteries and all affected tribes of the
find. The State Physical Anthropologist will make a determination of whether the remains are Indian or NonIndian and report that finding to any appropriate cemeteries and the affected tribes. The DAHP will then
handle all consultation with the affected parties as to the future preservation, excavation, and disposition of
the remains.

References

State of Washington Department of Archaeology and Historic Preservation (DAHP). 2020. State Historic Preservation Officer concurrence letter. June.

Department of Navy (Navy). 2020. Sampling and Analysis Plan Addendum, Site Inspection for Perfluorinated Compounds in Groundwater, Outlying Landing Field Coupeville, NAS Whidbey Island, Coupeville, Washington. August.

Figure



Appendix A Monitoring Contact Information



Supplemental Site Inspection Report Addendum for Per- and Polyfluoroalkyl Substances Outlying Landing Field Coupeville Naval Air Station Whidbey Island Oak Harbor, Washington

NOTIFICATION: THIS PAGE CONTAINS SENSITIVE BUT UNCLASSIFIED INFORMATION WHICH IS PROTECTED BY THE FREEDOM OF INFORMATION ACT

FOIA Exemption 6 (5 USC 552(b)(6)) Personal Information Affecting an Individual's Privacy

TO REQUEST A COPY OF THE DOCUMENT

PLEASE CONTACT

Department of the Navy Freedom of Information Act Office

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Jacobs

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То:	Rachel Clennon, P.G., Jacobs Engineering Group, Inc.
From:	Jane Wiegand, M.A., Jacobs Engineering Group, Inc.
Date:	May 14, 2021
Subject:	Results of Archaeological Monitoring, Supplemental Site Investigation Phase 3, OLF Coupeville, NAS Whidbey Island, Island County, Washington

This memorandum summarizes the results of archaeological monitoring completed by Jacobs Engineering Group Inc. (Jacobs) for the Supplemental Site Investigation Phase 3 field effort on Outlying Landing Field (OLF) Coupeville, Naval Air Station (NAS) Whidbey Island in Island County, Washington.

Jacobs archaeologist Jane Wiegand, M.A., a professional archaeologist, conducted the archaeological monitoring for the entire monitoring effort. Matthew Sterner, M.A., RPA, senior archaeologist, served as principal investigator for the monitoring.

PROJECT LOCATION AND DESCRIPTION

Monitoring was completed for the installation of one monitoring well on a parcel northeast of OLF Coupeville owned by Island County. The parcel is situated in Section 1 of Township 31, Range 1E, Willamette Base and Meridian. The project is working to investigate releases of per- and polyfluoroalkyl substances (PFAS) at NAS Whidbey Island, OLF Coupeville. As the lead federal agency, NAVFAC Northwest has been conducting consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA) for the project.

ARCHAEOLOGICAL MONITORING METHODS

A professional archaeologist was on-site during ground-disturbing activities associated with the project. The on-site archaeological monitor observed ground disturbances, examined the borehole opening and retrieval of soil samples from the boring for evidence of cultural resource materials while maintaining a safe distance from drilling equipment. The monitor could request that drilling activities be temporarily halted as necessary to allow photography and recovery of materials and data. Any soil sample material could have been screened at the discretion of the monitor. The archaeological monitor was prepared with the basic equipment needed to perform site documentation, evaluation, and recovery of any cultural materials identified. Archaeological monitoring continued until drilling was confirmed to be at a depth below any culture-bearing deposits.

The archaeological monitor prepared daily field monitoring verification reports, noting observations, results, and actions taken, as necessary, associated with the monitoring activities. Photographs were taken to document the drilling activities and would have also recorded the character and provenance of any identified cultural resources (if encountered).

SUMMARY OF RESULTS

Monitoring was completed on October 13, 2020, at the drill location at 48°11'57.26"N 122°38'3.79"W. The well drilling was anticipated to reach 200 feet (ft) below ground surface (bgs), although glacial drift deposits were anticipated to occur much shallower.

In summary, the monitor observed silty sand transitioning to silty gravel and mixed gravel (0 to 10 ft bgs), gravel and sand (10 to 30 ft bgs), gravel and grey sand inclusions (30 to 40 ft bgs), and course gray sand and sandy gravel (40 to 45 ft bgs). The sediments observed indicated that glacial drift was encountered less than 10 ft bgs; monitoring conservatively continued to a depth of 45 ft bgs to confirm observed conditions.

CONCLUSIONS

No cultural resources, such as historical-period or precontact artifacts, anthropogenic soils, were observed. Similarly, no buried surfaces or soils were observed during the monitoring effort. No archaeological artifacts were collected or removed from the site. In conclusion, no archaeological resources were observed or impacted, and the drilling had no effect to historic properties.

Appendix D Soil Boring Log, Monitoring Well Construction Diagram, and Development Log

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Stabiliz 1010- 1036 1010- 1036 1010- 1036 1010- 1125 1225 1225 1240 1245 1245 1246 1245 1245 1240 1245 1255 1245 1255 1245 1255 1245 1255 1245 1255 1245 1255	aton Criteria Begin E Begin E Begin E Begin E Begin E 0.92 5.0 5.5 6.25 6.75 6.95 Develop 6.95 Develop 3: Well : Pump P	±0.1 Surge. complet ail urge 15.0 15.4 15.3 15.6 (5.3 ment c 15.3 punger Punger cleol to	± 0.02 (if >1) 1.294 0.549 0.986 0.855 0.788 0.744 0.713 amplete 0.713 e Start Time: (ofry of fix leak	6.62 9.70 8.11 7.98 8.36 7.89 8.16 2 based 8.16 1110 1110 1110 1110 1110 1110	±0.1 8.93 8.96 9.08 8.39 8.77 8.66 8.57 0n H 8.57 0n H 8.57 0n H 8.57 0n H	± 10 0.5 24.5 47.5 20.4 -6.1 -16.9 -9.8 me 3p -9.8 me 3p -9.8 by, pum lecl at 1	<± 10% or ≤10 NTU 12468 4666 12155 4457 5292 3136 5175 ent on 1 5175 Purge Rate: p stopped 200.	Air Monitoring: VOC (ppm) = H2S (ppm) = LEL (%) = CO (ppm) =	Thick/gray/Nba Ihick/gray/Nba In In In In In In In In In In



PROJECT NUMBER: 9000NVT1

BORING NUMBER: **MW-18**

SHEET 1 OF 4

Borehole Log

PROJECT : NASWI OLF Supplemental Site Investigation Phase-3 LOCATION : Outlying Landing Field, Coupeville, WA

COORDINATES : pending

ELEVATION : pending

DRILLING CONTRACTOR : Yellow Jacket

DRILLING METHOD AND EQUIPMENT : Rotosonic - 6-inch casing, 4-inch core barrel Start : 10/13/20 09:30 WATER LEVEL: 122.0 ft bgs END : 10/14/20 12:25 LOGGER : Eric Stokerson DEPTH BELOW GROUND SURFACE (ft) **GRAPHIC LOG** INTERVAL RECOVERY (ft) SOIL DESCRIPTION: COMMENTS WELL DETAILS Soil name, USCS, color, moisture, density, description SILTY SAND (SM) Flush mount 8-inch black (10YR 2/1), dry, very fine to medium grained sand. Some organic steel monument Bentonite grout roots 5.0 SILTY SAND (SM) Hand auger boring to dark grayish brown / dark yellowish brown (10YR 4/2), dry, very fine to 5-feet for utility clearance medium grained sand. Increase in silt concentration. Medium stiff at 5-feet. 5 WELL GRADED GRAVEL (GW) very dark gray (2.5Y 3/1), dry, fine to coarse grained gravel. 5.0 Core PID = 0.0 ppm 10 WELL GRADED GRAVEL (GW) very dark gray (2.5Y 3/1), wet, fine to coarse grained gravel. 15 8.8 Core PID = 0.0 ppm WELL GRADED SAND WITH GRAVEL (SW) very dark gray (2.5Y 3/1), wet, fine to coarse grained sand, with some 20 coarse gravel, and few fines. BORING LOG: OLF GLB: OLF FIELD EVENT 3. GPJ: CH2M GEOTECH 12. GDT: 05/04/27 25 6.0 POORLY GRADED SAND (SP) Core PID = 0.0 ppm dark gray (2.5Y 4/1), dry, loose, fine grained sand, with little fines. 30 POORLY GRADED GRAVEL (GP) dark gray (2.5Y 4/1), moist, coarse grained gravel, with few coarse grained sand to fine grained gravel, and few fines POORLY GRADED SAND (SP) 35 9.8 dark gray (2.5Y 4/1), medium to coarse grained sand, with few coarse Core PID = 0.3 ppm gravel. 40 POORLY GRADED GRAVEL (GW) Core temperature dark gray (2.5Y 4/1), slightly moist, coarse grained gravel, with fine to increasing, drilling 5-foot coarse grained sand, and few fines. runs to mitigate 6.0 45 SOIL I POORLY GRADED SAND (SP) 6.0 dark gray (2.5Y 4/1), slightly moist, fine grained sand, with trace fines, and NEW trace coarse gravel.


PROJECT NUMBER:	BORING NUMBER:				
9000NVT1	MW-18	SHEET	2	OF	4

Borehole Log

PROJECT : NASWI OLF Supplemental Site Investigation Phase-3 LOCATION : Outlying Landing Field, Coupeville, WA

COORDINATES : pending

SOIL BORING LOG: OLF GLB; OLF FIELD EVENT 3.GPJ; CH2M GEOTECH 12.GDT; 05/04/27

NEW

ELEVATION : pending

DRILLING CONTRACTOR : Yellow Jacket

DRILLING METHOD AND EQUIPMENT : Rotosonic - 6-inch casing, 4-inch core barrel Start : 10/13/20 09:30 END : 10/14/20 12:25 WATER LEVEL: 122.0 ft bgs LOGGER : Eric Stokerson DEPTH BELOW GROUND SURFACE (ft) **GRAPHIC LOG** INTERVAL RECOVERY (ft) **SOIL DESCRIPTION:** COMMENTS WELL DETAILS Soil name, USCS, color, moisture, density, description POORLY GRADED GRAVEL (GW) Drilling returns to 10-foot dark gray (2.5Y 4/1), fine to medium grained gravel, with fine grained sand, runs and few fines. 55 9.4 Core very dry and powdery, likely from drilling through cobble or coarse gravel Hard drilling, driller begins 60 using water to aid advancement Core PID = 4.7 ppm Mild odor POORLY GRADED SAND (SM) 65 9.5 dark gray / olive gray (5Y 4/1), slightly moist, fine grained sand, with few fines appearing in non-plastic clumps displaying silt fracturing. 70 POORLY GRADED SAND (SP) very dark grayish brown (2.5Y 3/2), slightly moist, fine grained sand, with little fines 75 9.0 Core PID = 0.0 ppm No gravel in SP 80 85 9.3 SILTY SAND (SM) very dark grayish brown (2.5Y 3/2), slightly moist, fine grained, poorly graded sand, with silt appearing in non-plastic clumps. Core PID = 29.8 ppm Slight odor 90 Core PID = 393 ppm Unknown odor Core PID = 127 ppm Unknown odor 95 8.5 No coarse material in SM Core PID = 29.1 ppm Unknown odor 100

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PROJECT NUMBER: BORING NUMBER: 9000NVT1 **MW-18**

SHEET 3 OF 4

Borehole Log

PROJECT : NASWI OLF Supplemental Site Investigation Phase-3 LOCATION : Outlying Landing Field, Coupeville, WA

COORDINATES : pending

NEW

ELEVATION : pending

DRILLING CONTRACTOR : Yellow Jacket

DRILLING METHOD AND EQUIPMENT : Rotosonic - 6-inch casing, 4-inch core barrel

Start : 10/13/20 09:30 WATER LEVEL: 122.0 ft bgs END : 10/14/20 12:25 LOGGER : Eric Stokerson DEPTH BELOW GROUND SURFACE (ft) **GRAPHIC LOG** INTERVAL / RECOVERY (ft) **SOIL DESCRIPTION:** COMMENTS WELL DETAILS Soil name, USCS, color, moisture, density, description 105 8.0 Core PID => 400 ppm (maxed-out sensor at 400 ppm) Noticable odor 110_ Core PID => 400 ppm Core PID = 110 ppm Bentonite seal 115_ 8.5 Core PID => 400 ppm Filter pack Core PID => 400 ppm 120_ SILTY SAND (SM) 15-foot 2-inch SCH very dark gravish brown (2.5Y 3/2), moist, fine grained, poorly graded sand, with silt appearing in non-plastic clumps. 80 PVC 0.010-in slot Core PID = 4.9 ppm screen SILT WITH SAND (ML) SOIL BORING LOG; OLF.GLB; OLF FIELD EVENT 3.GPJ; CH2M GEOTECH_12.GDT; 05/04/2 Core PID = 1.7 ppm very dark grayish brown (2.5Y 3/2), wet, medium plasticity, silt that easily No clay in ML fractures, with little, fine grained sand. 125 9.0 Core PID = 4.8 ppm Core PID = 7.1 ppm 130_ ELASTIC SILT (MH) Core PID = 10.0 ppm dark gray (GLEY1 4/N), wet, medium plasticity silt that fractures, and clay. Core PID = 7.7 ppm 135 10.0 Filter pack Core PID = 6.7 ppm Backfill Core PID = 6.4 ppm 140_ 145 11.5 Core PID = 0.0 ppm



PROJECT NUMBER: BORING NUMBER: 9000NVT1 MW-18

SHEET 4 OF 4

LOGGER : Eric Stokerson

Borehole Log

PROJECT : NASWI OLF Supplemental Site Investigation Phase-3 LOCATION : Outlying Landing Field, Coupeville, WA

COORDINATES : pending

ELEVATION : pending

DRILLING CONTRACTOR : Yellow Jacket

DRILLING METHOD AND EQUIPMENT : Rotosonic - 6-inch casing, 4-inch core barrel

WATER LEVEL: 122.0 ft bgs

Start : 10/13/20 09:30 END : 10/14/20 12:25

DEPTH BELOW GROUND SURFACE (ff)	INTERVAL / RECOVERY (ft)	GRAPHIC LOG	SOIL DESCRIPTION: Soil name, USCS, color, moisture, density, description	<u>COMMENTS</u>	WELL DETAILS
	9.0		ELASTIC SILT (MH) dark gray (GLEY1 4/N), SAME AS ABOVE, slight increase in sand content.	Core PID = 0.0 ppm	-
	10.5		dark gray (GLEY1 4/N), SAME AS ABOVE, dry, becomes hard with strong cementation, sand content decreases.	Core PID = 0.0 ppm	
	11.0			Core PID = 0.0 ppm	
	9.0		dark gray (GLEY1 4/N), SAME AS ABOVE, moist, hard with strong cementation, sand content increases.	Core PID = 0.0 ppm	
	9.0		SILTY SAND (SM) dark gray (GLEY1 4/N), wet, very fine to fine grained sand, with some silt.	Core PID = 0.0 ppm	

Appendix E Sampling and Analysis Plan Field Change Request

ch2m:

Sampling Analysis Plan Field Change Request (FCR) (9000-4405-FCR-02 OLF Coupeville SI)

Date of Change: 11/07/2019

FCR No. (assigned by PM): 2

Applicable Sampling Analysis Plan Title:

Supplemental Site Investigation, Outlying Landing Field Coupeville Sampling and Analysis Plan (SAP)

Project Number:	9000NVT1	Project Location:	Coupeville, WA
Contract Number:	N62470-16-D-9000, Co	ntract Task Order 44	05

Subject of Change:

1. Change monitoring well development method and sampling criteria.

Recommended Changes:

SAP Worksheet #11 - Project Quality Objectives/Systematic Planning Process Statements and Worksheet #14 - Summary of Project Tasks

- Change monitoring well development, which is conducted in accordance with NAVFAC NW SOP I-C-2 *Monitoring Well Development*, except where conditions warrant change in consultation and approval with the CH2M STC/PM and NAVFAC NW RPM.

If shallow wells are purged dry early in development, and are slow to recharge, in consult with senior technical team it was determined a modified well development approach would be taken to achieve well conditioning:

- Development under SOP I-C-2 would be attempted.
- If significant water drawdown occurred during the swabbing and bailing portion, the well would be allowed to recharge to ensure the full screen interval is completed.
- If significant water drawdown is observed during the over-pumping portion, that well would be purged dry and left to recharge. A total of three well volumes would be purged, if feasible. If turbidity is still extremely high at completion of third purge, the well would be scheduled for sampling towards the end of the sampling event to allow the well to settle. The well will be assessed during groundwater sampling and undergo additional development if warranted.

This change will be described in updated project Field Instructions.

Reason for Change:

1. Adjusted monitoring well development methods due to lithology and well conditions (e.g. WI-CV-MW21S, -MW22S, and -MW23S due to slow recharge rates).

Submitted by:	Mark Endo	Company: CH2M	Date: 11/13/2019
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Review & Acceptance:										
Activity Manager:	Jennifer Madsen	Date: 11/15/19								
Project Manager:	Rachel Clennon	Date: 11/13/19								
Environmental Manager:	NA	Date:	Date:							
Navy RPM/NTR:	Kendra Clubb (Leibman) Date: 11/18/19								
Distribution:	Distribution:									
1. Approvers above	2. FTL	3. Field Staff	4.							
5.	6. 7.		8.							

File Copies: Project File

Appendix F Investigation-Derived Waste Profiles



WASTE/MATERIAL PROFILE FORM

US Ecology Nevada (Beatty) US Ecology Idaho (Grand View) US Ecology Texas (Robstown) US Ecology Michigan (Detroit)

800-239-3943 800-274-1516 800-242-3209 800-396-3265

PROFILE #_____

Α.	A. GENERATOR INFORMATION												
1. Generator: US Navy Air Station Whidbey Island						ſ	Billing information is same P.O. required for						t
2. Facility Address:						12. Billing Company: Capitol Environmental Services, Inc.							
18025 WA-20, Coupeville, WA 98239					13. Billing Ad	dress: 2	00 Biddle A	Ave, Suite 205					
3.	Mailing Address: 1115	5 W. Lexingto	n St.				14. City/State	e /Zip: Ne	ewark, DE				
4.	City/State/Zip: Oak Ha	arbor, WA 982	277				15. Billing Co	ntact: T	erri Fort				
5.	Technical Contact: Ar	nber Derise					16. Phone: 54	40-777-6	547	17.Fa	x:		
6.	Phone: 360-257-100	8	7. Fax	c :			18. Email: tfo	rt@capit	olenv.com				
8. Generator Status:													
9. EPA ID #: N/A 10. State ID #:													
11.	NAICS CODES:												
В.	SHIPPING INFORM	ATION		<u></u>		-		<u>_</u>		<u></u>		<u> </u>	
1.	US DOT Shipping nam	ie: Nonf	RCRA, N	onDOT re	gulated wast	ewater	r						
2.	Hazard Class: nonhaz	<u></u>	3.	UN/NA#	: N/A		4. Pack	aging G	r oup: N/A		5. RQ: N	I/A	
6.	Container Type:	🗖 Bu	lk [Totes	Palle	t	Boxes		Drums	Other, Des	cribe:		
7.	Frequency:	 	ar F	– Duartei		onthly	 ∕ □ _1t	ime I	Other.	Describe:			
•	Chinesente	<u> </u>	330 gal			3			9.	Waste Impo	rt: 🗌 Yes	🗌 No	
8.	Snipment:	Size:	Joo gui		Quantity:				(If y	ves, complete W	aste Import Su	upplement)	
С.	GENERAL MATERIA	L & REGULA	ATORY I	NFORMA	TION								
1.	Common name: Wat	er for solidific	ation										
Mor per 3. Cle	nitoring wells onsite. Se fluoroinated compound t Describe physical app ar/cloudy water, minima	e Sample #'s esting. Samp earance: I sediment.	WI-CV-I ple #'s W	DW-AQ01 I-CV-IDW-	-1219, WI-C AQ01-1214	V-IDW 19, WI-	-AQ02-1219, a CV-IDW-AQ0	and WI-C 2-121419	V-IDW-AC 9, and WI-C	03-1219 in La CV-IDW-AQ03-	b report 19-13 121419 in La	319 for b report J91	507-1.
				_					_				
4.	Odor: None	L Sli	ght	Strong	5	5.	Physical Stat	e:	Liquid	i 🗌 Slu	udge/Slurry	Solid	
6.	Describe Color: Clear	/cloudy				7.	Liquid phase	s:	Single	Do Do	ouble Layer	Multi-	layer
8.	Knowledge is from:	<u> </u>	Lab analy	ysis				ess/gene	rator knov	vledge			
9.	Waste/Material Type	US Ecology	Texas cu	istomers (only):			1		trial	Non-Ir	idustrial	
10.	Restricted under EPA	Land Dispos	al Restric	ctions (§2	68)?			Yes					
11. 13	If LDR "Yes":	wast vast	ewater	taining he	Non-waste	water	Ueb Deb	ris (9268 oleum R	6.2) 12. efinery (SI	Alt. Standard	as for soil?	Yes	L NO
10.	Manufacturing Plant	(SIC 2800 thr	u 2899)	or Coke b	y-Product Re	ecover	y Plant (SIC 3	312)? <i>(Ij</i>	f yes, compl	lete Benzene	lical	Yes	🗌 No
14	Waste/Material Operat	ions Suppleme	ent Form a	and Therma	al Supplement	(Dopport	: w 15 Has	it boon	treated af	ter point of g	neration?		
16.	CFRCLA Regulated (Su	uperfund) W	aste:	o ppinw			17. But	adiene v	vaste regu	lated by 863 S	Subpart XX:		
18.	Waste contains UHC	constituent(s	s) (§268.4	18), above	a treatmen	t stan	dard, other th	an those	e for which	h the waste e	chibits a		
	characteristic. (If yes,	list all UHC's i	n Section	D):			-					Yes	
19.	Waste exempt from d	lefinition of '	"solid wa	ste" or "l	nazardous w	aste"	(If yes, list re	ference	40CFR):	Yes	🔲 No
20.	State Waste Codes:	N/A											
21.	RCRA Waste Codes:	N/A											
I													
22.	Source Code:	G19	Other	с	23. Form (Code:	W119 0	Other	24. Ma	nagement Coo	de: H	(USE	only)

D. COMPOSITION (use additional form if necessary)									
					Ran	ge total ≥ 100%	6		
Constituent		Units	TCLP	Totals	Typical	Min	Max		
Water		%				98	100		
Soil/sediment		%				0	2		
Perfluorohexanoic acid		ng/L				17.86	29.21		
Perfluorooctanoic acid		ng/L				12.39	81.22		
Perfluorohexanesulfonate		ng/L				35.60	77.69		
Perfluorooctanesulfonate		ng/L				17.32	47.23		
Perfluorobutanesulfonate		ng/L				2.68	7.37		
See reference to analytical in Section C, #2.									
See analytical results for full testing of PFC chemicals.									
E. CHARACTERISTICS			<u> </u>						
1. Oxidizer Yes No	9. Reactiv	ve sulfides	_ppm			🗌 Yes	🗌 No		
2. Explosive	10. Reactiv	ve cyanides	_ppm			Yes	🗌 No		
3. Organic peroxide Yes No	D 11. Water	/air reactive				🗌 Yes	🔲 No		
4. Shock sensitive	12. Therma	ally unstable				🗌 Yes	🗌 No		
5. Tires	13. TSCA r	egulated PCB waste	(control she	et required v	vith shipment)	Yes	No		
6. Pyrophoric Yes No	o 14. Medica	al/infectious waste				☐ Yes			
7 Compressed gas	15 Radioa	ctive (If ves. complete	e Profile Sun	nlement for l	Radioactive Was				
8 Halogenated organics Ves No.	16 Hazard	lous Secondary Mat	erial (HSM)))					
17. Possibility of incidental liquids from transportatio	n? 🔲 Ye	es 🔲 No)	<u> </u>					
18. Is waste/material a solid using the paint filter test	? 🔲 Ye	es (solid) 🔲 No	o (not solid))					
19. pH: (If solid, what is pH if mixed with water?)	Range 6	to <u>9</u> Ty	pical		l≤2 □ 2	2 < 12.5	≥ 12.5		
20. Flash Point: > 211 ♀ F	□ < 140 º F				<u> </u>				
20 Is the waste /material oil bearing from Petroleum	Refining Product	ion or Transportatio	on practice	2		s 🗖 No			
	inclining, i roudet			5.					
Yes No I certify this waste/materia	I may be dispose	d without further tr	eatment.						
L certify this waste/materia	I meets all requir	ements of legitimat	e recycling	of hazardo	us secondarv n	naterials unde	r 40 CFR		
□ Yes □ N/A 260.43 and/or I am comply	ing with the cond	litions for generator	s using the	verified re	cycler exclusio	n.			
I authorize US Ecology to correct inconsistencies on the waste/material profile form that impact management decisions with my oral or written authorization. US Ecology will require re-submittal of the waste/material profile information if substantial changes are determined necessary. I understand waste/material that does not conform to specifications described in this profile may be rejected by US Ecology unless other contractual arrangements have been agreed to by both parties. I certify, under penalty of law, that I am familiar with this waste/material stream through analysis and/or process knowledge, and that all information provided is true, accurate, representative and complete, that all known or suspected hazards have been disclosed, and that this form was completed in accordance with the instructions provided.									
Print Name	Signature		Title	e		Date			



WASTE/MATERIAL PROFILE FORM

US Ecology Nevada (Beatty) US Ecology Idaho (Grand View) US Ecology Texas (Robstown) US Ecology Michigan (Detroit)

800-239-3943 800-274-1516 800-242-3209 800-396-3265

PROFILE #_____

A. GENERATOR INFORMATION													
1. Generator: US Navy Air Station Whidbey Island							Billing information is same P.O. required						t
2. Facility Address:						12. Billing Company: Capitol Environmental Services, Inc.							
18025 WA-20, Coupeville, WA 98239					13. Billing Ad	dress: 2	00 Biddle A	Ave, Suite 205					
3.	Mailing Address: 1115	5 W. Lexingtor	n St.				14. City/State	e /Zip: Ne	ewark, DE				
4.	City/State/Zip: Oak Ha	irbor, WA 982	77				15. Billing Co	ntact: Te	erri Fort				
5.	Technical Contact: Ar	nber Derise					16. Phone: 54	0-777-6	547	17. Fa	x:		
6.	Phone: 360-257-100	8	7. Fax:				18. Email: tfo	rt@capit	olenv.com				
8. Generator Status:													
9. EPA ID #: N/A 10. State ID #:													
11.	NAICS CODES:												
В.	SHIPPING INFORM	ATION		<u> </u>		ł		<u></u>		<u> </u>			
1.	US DOT Shipping nam	ie: NonF	RCRA, Nor	nDOT reg	julated wast	ewater							
2.	Hazard Class: nonhaz	<u>_</u>	3. L	JN/NA #:	: N/A		4. Pack	aging Gr	roup: N/A		5. RQ: N	√A	
6.	Container Type:	🗖 Bull		Totes	Palle	t	Boxes		Drums [Other. Des	cribe:		
7	Frequency:			Quarter		onthly		ime [Other	Describe:			
	inequency.		' L	Quarter		2 2			9	Waste Impo	rt: 🗖 Yes		
8.	8. Shipment: Size: 330 gal Quantity: 3 9. Waste import: 198 (If yes, complete Waste Import: 198 (If yes, complete Waste Import:									upplement)			
С.	GENERAL MATERIA	L & REGULA	TORY IN	FORMA	TION								
1.	Common name: Wat	er for solidifica	ation										
Mor perf 3. Clea	nitoring wells onsite. Se fluoroinated compound t Describe physical app ar/cloudy water, minima	e Sample #'s esting. Samp rearance: I sediment.	WI-CV-ID ble #'s WI-	W-AQ01- CV-IDW-	-1219, WI-C [\] AQ01-12141	V-IDW 19, WI-	-AQ02-1219, a CV-IDW-AQ02	and WI-C 2-121419	V-IDW-AQ 9, and WI-C	03-1219 in Lal V-IDW-AQ03-	o report 19-13 121419 in La	319 for ıb report J91	507-1.
			Г	1 character		-	Dhard Chat						
4. 6			int L	_ Strong	•	5.	Physical State	e:			uble Laver		lavor
0. g	Knowledge is from:		ah analys	ic		7.		s.			uble Layer		layei
9.	Waste/Material Type	US Ecology	Texas cus	tomers of	nlv):			ss/gener		rial	Non-Ir	dustrial	
10.	Restricted under EPA	Land Disposa	al Restrict	ions (§26	58)?			Yes)			
11.	If LDR "Yes":	Waste	ewater		Non-waste	water	Deb	ris (§268	(.2) 12.	Alt. Standard	Is for soil?	Yes	No
13.	Is the material RCRA I Manufacturing Plant Waste/Material Operati	hazardous wa (SIC 2800 thru ions Suppleme	aste conta u 2899) oi nt Form an	aining be r Coke by d Therma	nzene and o /-Product Re	origina ecover : <i>Form)</i>	ting at a Petro y Plant (SIC 3 :	oleum Ro 312)? <i>(If</i>	efinery (SI fyes, comple	C 2911), Cherr ete Benzene	nical	Yes	No
14.	VO Conc.(§264.1083)		<500	ppmw	≥50	Oppm	w 15. Has	it been t	treated aft	ter point of ge	eneration?	Yes	No No
16.	CERCLA Regulated (Su	uperfund) Wa	iste:		Yes	🗌 No	17. But	adiene w	vaste regul	lated by §63 S	ubpart XX:	Yes	🔲 No
18.	Waste contains UHC	constituent(s) (§268.48	8), above	a treatmen	t stan	dard, other th	an those	e for which	n the waste ex	hibits a	🗌 Yes	🔲 No
19	Waste exempt from d	list all UHC's in	solid was	<u>/:</u> te" or "h	azardous w	aste"	lif ves list re	foronco	40CER		}.		
20	State Waste Codes						1.5 9 00, 1150 10	S. CHEC			/·		
20.	RCRA Waste Codes:												
 									1		-		
22.	Source Code:	G19	Other c	2	23. Form (Code:	W119 C	uner	24. Mar	nagement Coo	le: H	(USE	only)

D. COMPOSITION (use additional form if necessary)									
				Ran	ge total ≥ 100%	6			
Constitue	Units	TCLP	Totals	Typical	Min	Max			
Water				%				98	100
Soil/sediment				%				0	2
Perfluorohexanoic acid				ng/L				17.86	29.21
Perfluorooctanoic acid				ng/L				12.39	81.22
Perfluorohexanesulfonate				ng/L				35.60	77.69
Perfluorooctanesulfonate				ng/L				17.32	47.23
Perfluorobutanesulfonate				ng/L				2.68	7.37
See reference to analytical in Section C, #	# 2.								
See analytical results for full testing of PF	C chemical	S.							
E. CHARACTERISTICS				L					
1. Oxidizer	Yes	🗌 No	9. Reactiv	/e sulfides	ppm			🗌 Yes	🗌 No
2. Explosive	Yes	🗌 No	10. Reactiv	/e cyanides	_ppm			Yes	🔲 No
3. Organic peroxide	Yes	🗌 No	11. Water	air reactive				🗌 Yes	🔲 No
4. Shock sensitive	Yes	🗌 No	12. Therma	ally unstable				🗌 Yes	🗌 No
5. Tires	Yes	No	13. TSCA r	egulated PCB waste	(control she	et required v	with shipment)	Yes	No
6. Pyrophoric	Yes		14. Medica	al/infectious waste			, . ,	Yes	
7 Compressed gas			15 Radioa	ctive (If ves complete	e Profile Sun	nlement for	Radioactive Was		
8 Halogenated organics			16 Hazard	ous Secondary Mat	erial (HSM))			
17. Possibility of incidental liquids fro	m transpoi	rtation?		es 🔲 No)	/			
18. Is waste/material a solid using the	e paint filte	r test?	Te Ye	es (solid) 🔲 No	o (not solid))			
19. pH: (If solid, what is pH if mixed with	water?)	R	ange <u>6</u>	to <u>9</u> Ty	pical		≤2 □ 2	2 < 12.5	≥ 12.5
20. Flash Point: > 211	⁰ F] < 140 º F						
20. Is the waste/material oil bearing f	rom Petrol	eum Refi	ining, Product	ion or Transportatio	on practice	s?	Ye	s 🔲 No	
F. GENERATOR'S CERTIFICATION									
Yes No I certify this	s waste/ma	aterial m	ay be dispose	d without further tr	eatment.				
Yes N/A I certify this	s waste/ma	aterial m	eets all requir	ements of legitimat	e recycling	of hazardo	us secondary n	naterials unde	r 40 CFR
	/or i am co	mpiying		nuons for generator	is using the			[].	
I authorize US Ecology to correct incons	istencies oi	n the was	ste/material p	rofile form that impa	act manage if cubstanti	ement decis	ions with my or	ral or written	adorstand
waste/material that does not conform t	o specificat	tions des	cribed in this r	profile may be reject	ted by US F	cology unle	ss other contra	ctual arrangem	ients have
been agreed to by both parties. I certif	y, under pe	enalty of l	law, that I am	familiar with this wa	aste/mater	ial stream th	nrough analysis	and/or proces	S
knowledge, and that all information pro	vided is tru	ue, accura	ate, represent	ative and complete,	that all kno	own or susp	ected hazards l	have been disc	osed, and
that this form was completed in accord	ance with t	he instru	ctions provide	d.					
Print Name		S	ignature		Title	e		Date	