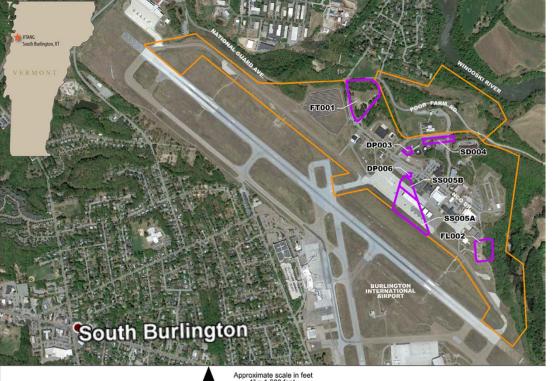
Optimizing Remediation to Achieve Closure at Multiple Sites at Vermont Air National Guard Base

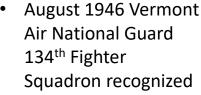




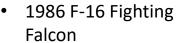


75 Years of Airbase Operations









2019 F-35 Lightning II





7 Environmental Restoration Program Sites:

- FT001 Former Fire Department Training Area & Old Landfill
- FL002 Former Construction Debris Landfill
- DP003 Pumps, Oils, Lubricants (POL) Pumphouse
- SD004 Stormwater Drainage Ditch
- SS005A Former Refueling Pits
- SS005B Former POL Pumphouse and Underground Storage Tanks (USTs)
- DP006 AOC Former Oil Pit

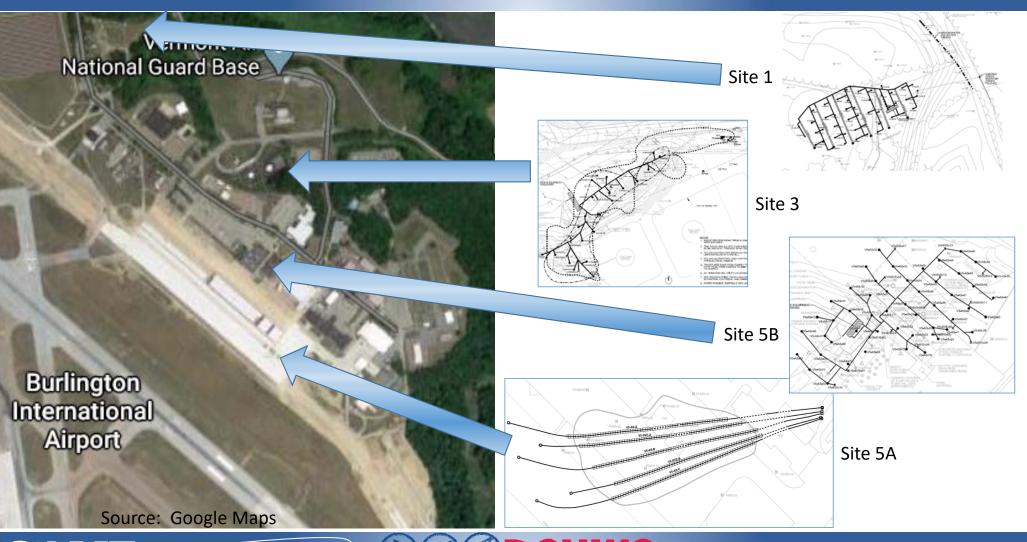


VTANG Base Boundary



Site Installation Map VTANG, South Burlington, Vermon

March 29, 31 and April 1, 2021







March 29, 31 and April 1, 2021

History of Decisions

Regulatory Lead – Vermont Department of Environmental Conservation

- Following a CERCLA-like process
- Site Characterization 1980's
- Interim Actions 2000's (SVE, MPE, LNAPL Recovery, Hyd. Containment)
- Remedial Investigation Report March 2010
- Feasibility Study August 2010
- Proposed Plan / Record of Decision November 2010
- Remedial Design December 2011
- Remedial Construction 2012



Operation, Maintenance, Monitoring

• Remedial Action Construction Completion Report – April 2013







OM&M under a Performance-Based Contract

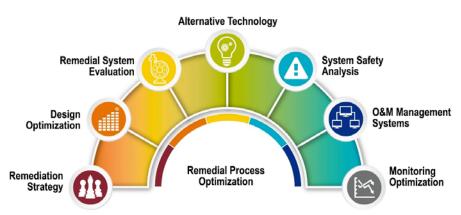
- Implementation of the Final Remedies and OM&M was conducted under competitively procured PBC with specific metrics:
 - RIP within specific date for each Site (6 total)
 - Maintain high system run times (90 to 95%) for each system
 - Attain no measurable LNAPL (<0.01 ft) in Monitoring Wells
 - Achieve % Reductions in COC concentrations in GW
 - Achieve Site Remediation Goals (MCLs) in Seeps
 - Receive DEC approval to shut down systems
 - Approval of NFRAP DD (ANG and VT DEC)
 - Achieve Site Management Activities Complete status from VTDEC





Optimization is Key

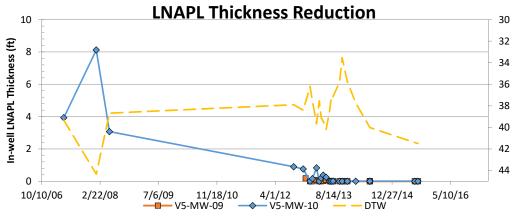
- Establish Metrics (Final and Intermediate)
- Track Progress Dashboards
- Engage Subject Matter Experts Routinely to Review Progress
 - Trends via Data Analytics, Operational Challenges
- If progress is not sufficient, ACT!

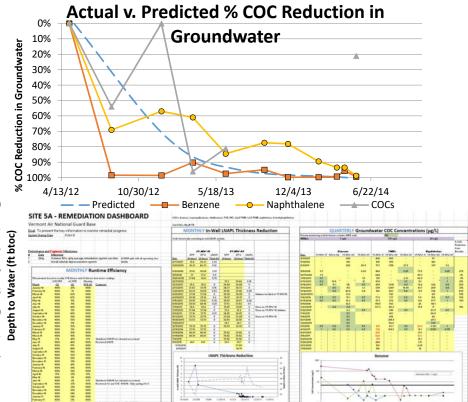




Integrated Optimization during OMM

- Routine RPO calls with team and SME (Monthly or Quarterly)
- Assessment of performance relative to metrics
- Identification of activities necessary to enhance performance
- · Facilitation of regulatory approval when needed
 - RA WP addenda









Optimization Output

Resampling of Key Wells
Redevelopment of Wells
LTMO – Assessment of location, frequency, and analytes
needed for each site (ongoing)
Brushing/cleaning of HDD SVE wells due to corrosion
Focused treatment in areas of rebound

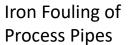
- AC-Based injections
- Supplemental AS/SVE Wells
- Packer Installation in HDD AS wells



AC-Based injections in areas of COC rebound



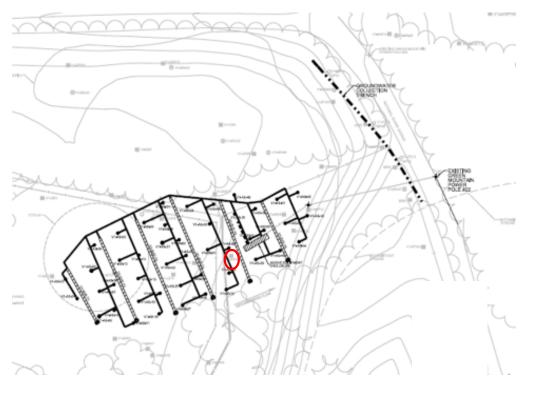
wells to focus
sparge in distal
well end







Site 1



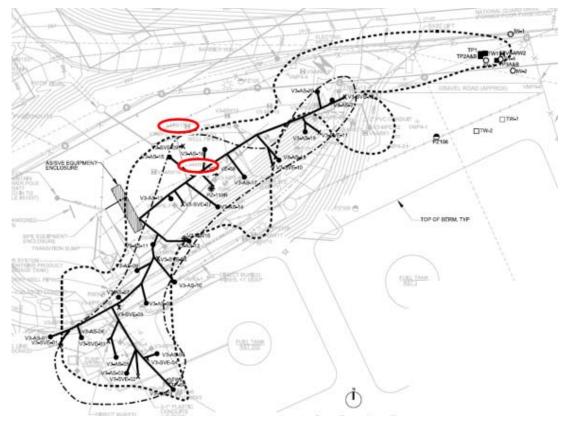
- June 2012 Startup of AS/SVE system
- February 2013 LNAPL no longer measurable
- November 2014 Rebound Assessment
- May 2015 Restart
- August 2015 Rebound Assessment, V1-MW5 remains above SRGs
- April 2016 Restart in Focused Areas
- May 2016 Shutdown
- May 2018 No Further Remedial Action Required for non-PFAS COCs from VT DEC
- May 2018 to Present Continued OMM for PFAS treatment system

1,740 lbs VOCs removed





Site 3



- May 2012 Startup of expanded multi phase extraction with enhanced bio and ISCO
- July 2013 LNAPL no longer measurable
- January 2014 Rebound Assessment
- February 2014 Restart in Focused Areas
- March 2014 Rebound Assessment
- August 2014 Restart in Focused Areas
- October 2014 Rebound Assessment, V3-MW-15 remains above SRGs
- October 2015 Focused AC-Based Injections (BOS®200)
- March 2016 V3-MW15R Installed
- July 2018 Restart
- November 2018 Shutdown
- April 2019 No Further Remedial Action

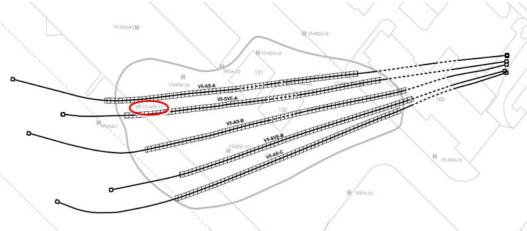
Required from VT DEC

15,492 lbs VOCs removed





Site 5A





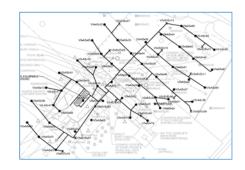
- October 2012 AS/SVE with HDD Startup
- October 2013 LNAPL no longer measurable
- February 2014 Approval to remove catalytic oxidizer vapor treatment
- May 2015 Rebound Assessment
- June 2015 Restart with Focused AS/SVE
- June 2016 Rebound Assessment, V5-MW-11 above SRGs for TMB and naphthalene
- September 2016 Focused sparging at well AS-A
- March 2017 Rebound Assessment
- January 2018 System Operated with SVE due to low gw elevations
- July 2018 Inflatable Packer installed in AS-A to promote sparging at the distal end of the well
- August 2018 Restart focused at well AS-A
- November 2018 System Shutdown
- April 2019 No Further Remedial Action Required from VT DEC

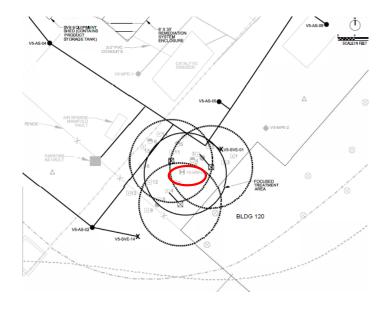
24,165 lbs VOCs removed

Site 5B

- April 2012 AS/SVE/MPE System Startup
- July 2013 LNAPL no longer measurable
- October 2014 Rebound Assessment
- October 2015 Focused AC-Based Injections (BOS®200) in V5-MW06 area
- March 2016 Rebound Observed V5-MW06
- October 2016 Focused SVE operation
- December 2016 Installation of 3 additional AS wells in V5-MW06
- January 2017 Restart Focused AS/SVE at 3 new wells
- June 2017 System Shutdown
- May 2018 No Further Remedial Action Required from VTDEC

24,625 lbs VOCs removed during system operations









The Outcome

- Average run times exceeded 98% for treatment systems in northern winter climate
- Achieved ~\$300K savings in operations through optimization actives (not including savings in avoiding future operations)
- Achieve Closure at 4 IRP Sites in 6 – 7 years after implementation of Final Remedies
- Achieved full contract value by meeting all operational and closure metrics for these sites

The Take-Away

- Performance Based Contracts pushed the team to aggressively optimize systems
- Remedial Process
 Optimization was key to staying on track and progressing to Site Closure
- PBC allowed flexibility to modify approaches once in OM&M phase
- Engaging the regulator early and often minimized transactional and administrative burden







Wrap Up

- No Further Remedial Action Planned achieved for four sites
- NFRAP DD achieved for three sites described in this presentation
 - Site 1 Continued operation (PFAS treatment)
 - Site 2 Long term rebound assessment
 - Site 4 Rebound Assessment
 - Site 6 No remediation required, AOC closed
- Site 3, 5A, 5B were completely decommissioned Summer 2020 and returned to original use for ANG

Thank you to Project Team:

Verónica Brieno Rankin, LL.M., Environmental Restoration Branch, NGB/A4VR **Richard Spiese**, Site Manager, Vermont Department of Environmental Conservation

Shannon Kelly, Environmental Program Manager, Vermont Air National Guard **Peter Dufault**, State Environmental Officer, Vermont Air National Guard



