National Aeronautics and Space Administration

White Sands Test Facility P.O. Box 20 Las Cruces, NM 88004-0020



April 27, 2023

RE-23-078 Reply to Attn of:

> Mr. Dave Cobrain, Acting Bureau Chief New Mexico Environment Department Hazardous Waste Bureau 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505-6303

Subject: Groundwater Data Representativeness Phase 2: Water FLUTe Well Evaluation Abbreviated Investigation Report

NASA submitted the Abbreviated Investigation Work Plan for Groundwater Data Representativeness, Phase 2: FLUTe Well Evaluation [AIWP] on November 2, 2021. On August 8, 2022, NMED approved the AIWP and directed NASA to complete the investigation and submit the Abbreviated Investigation Report no later than April 28, 2023.

Enclosed is the required Groundwater Data Representativeness Phase 2: Water FLUTe Well Evaluation Abbreviated Investigation Report. This submittal includes a bound paper copy of the abbreviated investigation report as Enclosure 1, Excel analytical data spreadsheets as Enclosure 2, analytical lab reports as Enclosure 3, and a CD-ROM with the report in PDF as Enclosure 4.

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

If you have any questions or comments concerning this submittal, please contact Michael Zigmond of my staff at 575-524-5484.

Sincerely,

DAVIS

Digitally signed by TIMOTHY TIMOTHY DAVIS Date: 2023.04.27 12:19:24 -06'00' Timothy J. Davis

Chief, Environmental Office

4 Enclosures

cc: (with enclosure) Mr. Gabriel Acevedo Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505 National Aeronautics and Space Administration



Groundwater Data Representativeness Phase 2: Water FLUTe Well Evaluation Abbreviated Investigation Report

April 2023

NM8800019434

NASA Johnson Space Center White Sands Test Facility

Groundwater Data Representativeness Phase 2: Water FLUTe Well Evaluation Abbreviated Investigation Report

April 2023

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

TIMOTHY DAVIS Digitally signed by TIMOTHY DAVIS Date: 2023.04.27 12:19:55 -06'00'

Timothy J. Davis Chief, Environmental Office See Electronic Signature

Date

National Aeronautics and Space Administration

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AIWP	Abbreviated Investigation Work Plan
bgs	Below Ground Surface
CFR	Code of Federal Regulations
COPC	Constituent of Potential Concern
DP	Discharge Permit
FLUTe	Flexible Liner Underground Technologies, LLC
ft	Feet/Foot
GC/MS	Gas Chromatography-Mass Spectrometry
GMP	Groundwater Monitoring Plan
HWB	Hazardous Waste Bureau
IDW	Investigation-Derived Waste
L	Liter
MPITS	Mid-plume Interception and Treatment System
NASA	National Aeronautics and Space Administration
NBBS	N-butyl-benzenesulfonamide
ND	Not Detected
NDMA	N-nitrosodimethylamine
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
QA	Quality Assurance
QC	Quality Control
SIM	Selective Ion Monitoring
SVOC	Semi-volatile Organic Compound
TCE	Trichloroethene
TIC	Tentatively Identified Compound
VOC	Volatile Organic Compound
WSTF	White Sands Test Facility

1.0 Background

In 2013, the National Aeronautics and Space Administration (NASA) began a campaign to replace Westbay^{®1} multiport sampling systems in several monitoring wells with sampling systems capable of being purged. To date, NASA has identified and installed two purgeable sampling systems believed to be capable of providing high quality, representative groundwater samples: dual-zone dedicated bladder pump systems and Water Flexible Liner Underground Technologies (FLUTeTM) multilevel groundwater monitoring systems. NASA has collected groundwater samples from each reconfigured monitoring well since installation, typically on a quarterly schedule. NASA evaluates groundwater chemical analytical data on an ongoing basis and has observed inconsistencies in data from samples collected from Westbay systems and samples collected from the replacement Water FLUTe systems. Of primary consideration are initial and ongoing detections of several semi-volatile organic compounds (SVOCs), including low concentrations of N-nitrosodimethylamine (NDMA), as well as more recent detections of 1,4-dioxane. Although Water FLUTe wells are purged prior to sample collection, purge volume is somewhat limited to approximately 5 to 8 gallons per FLUTe sampling zone by the small diameter purge/sample tubing and time required to perform purging. As a result, the potential exists for groundwater samples collected with the Water FLUTe system to be impacted by components of the system.

On March 29, 2016, the New Mexico Environment Department (NMED) approved NASA's January 27, 2016, *NASA WSTF Periodic Monitoring Report – Fourth Quarter 2015*, with a comment expressing uncertainty about the source of detections of NDMA in groundwater monitoring wells BLM-30, PL-6, PL-7, PL-8, PL-10, ST-5, and WW-3 during 2015 (NMED, 2016). In response, NASA provided an evaluation of NDMA results from the identified wells and requested an extension of time for submittal of the NMED-required reconfiguration work plan for the wells (NASA, 2017). On October 4, 2017, NMED approved NASA's submittal with modifications (NMED, 2017b). NMED Modification 1 required NASA to evaluate monitoring well sampling data. While developing the required data representativeness work plan, NASA continued to collect comprehensive groundwater samples and evaluate chemical analytical data. NASA continued to observe detections of SVOCs in samples from Water FLUTe sampling systems, including NDMA and several tentatively identified compounds (TICs) that may interfere with the analysis of White Sands Test Facility (WSTF) groundwater contaminants.

NASA also observed detections of 1,4-dioxane in several Water FLUTe wells. Preliminary data indicated that 1,4-dioxane contamination may be present in Water FLUTe systems. In the April 25, 2018, *Request for Extension of Time for NASA WSTF Monitoring Well Groundwater Data Representativeness Work Plan* (NASA, 2018a), NASA recommended immediate 1,4-dioxane sampling at several wells with Water FLUTe systems with subsequent analysis using SW-846 Method 8270D with selective ion monitoring (SIM) to more effectively quantify concentrations of 1,4-dioxane in Water FLUTe wells. NASA also requested additional time in which to prepare and submit the required work plan for evaluating data representativeness. NMED approved the request on May 15, 2018, pointing out that "…additional data will be used to confirm recently reported 1,4-dioxane concentrations in several groundwater monitoring wells equipped with Water FLUTe sampling systems and provide additional information for system evaluation" (NMED, 2018).

During 2018, NASA continued to collect samples for the analysis of SVOCs, including NDMA and 1,4dioxane, from several Water FLUTe wells. Chemical analytical data indicate a correlation between the Water FLUTe sampling system and detections of 1,4-dioxane and several tentatively identified SVOCs, leading NASA to conclude that the contamination may be originating with the sampling system. In efforts to verify this, NASA submitted *Abbreviated Investigation Work Plan for Groundwater Data Representativeness, Phase 1: FLUTe Well* on December 21, 2018 (NASA, 2018b). On May 13, 2019,

¹ Westbay is a registered trademark of Nova Metrix Ground Monitoring (Canada) Ltd.

NMED approved the abbreviated investigation work plan (AIWP) with modifications (NMED, 2019). NASA submitted the revised work plan with modifications on July 30, 2019 (NASA, 2019). NASA conducted the first phase of an evaluation of groundwater data representativeness in 2019, which comprised an evaluation of Water FLUTe monitoring well WW-4 to determine if the sampling system is the source of SVOCs, including NDMA and 1,4-dioxane. The fieldwork was conducted, and the Phase 1 Abbreviated Investigation Report was submitted to NMED (NASA, 2020). NMED approved the Phase 1 report with modifications (NMED, 2021), and NASA submitted a response to the approval with modifications on August 17, 2021 (NASA, 2021c).

In the Phase 1 report, NASA concluded that NDMA concentrations in groundwater samples collected from the Water FLUTe system may be representative of groundwater at that location. However, the uncertainty introduced by routine detections of NDMA in field quality control (QC) samples leads NASA to also conclude that further evaluation of NDMA at low levels is required at WSTF. In the Approval with Modifications of the Phase 1 report (NMED, 2021), NMED directed NASA to perform a Phase 2 investigation that expands upon the initial results at well WW-4 plus one or two other monitoring wells with Water FLUTe sampling systems.

NASA developed the *Abbreviated Investigation Work Plan* [AIWP] *for Groundwater Data Representativeness, Phase 2: FLUTe Well Evaluation* on November 2, 2021 (NASA, 2021d). NMED approved the work plan on August 8, 2022 and required submittal of the Phase 2 report by April 28, 2023 (NMED, 2022). The NMED-required Phase 2 investigation consisted of extended purging and time series sampling of four of the WW-4 groundwater monitoring zones (423, 589, 848, and 948), plus comparable purging and sampling at four other FLUTe monitoring zones including BLM-32-543, BLM-32-571, JER-2-684, and WW-5-909.

2.0 Location

Groundwater monitoring wells WW-4 and WW-5 are located approximately three miles west of the WSTF test areas near the western site boundary within the southern Jornada del Muerto Basin. Wells JER-2 and BLM-32 are approximately 2.5 miles northwest of the test area near the northwest WSTF boundary with the Jornada experimental range. Figure 2.1 shows the locations of these four wells.

3.0 Investigation Activities

The first phase of the data representativeness evaluation consisted of serial sampling and analysis of groundwater samples from the four sampling zones in well WW-4 (-423, -589, -848, -948) after the Water FLUTe sampling system was reinstalled, plus serial sampling and analysis of groundwater samples from the following Water FLUTe wells and zones including BLM-32-543, BLM-32-571, JER-2-684, and WW-5-909. Each selected Water FLUTe sampling zone will be tested in three steps: collection of pre-purge ("time zero") groundwater samples from the Water FLUTe system just as water comes to surface; purging and serial sampling of groundwater from each interval for trending the concentrations of NDMA, 1,4-dioxane and SVOC TICs as purging progresses; and evaluation of the sequential sampling analytical data of the constituents of potential concern (COPCs) to determine if there is an effect from expanded purging on COPC concentrations.

3.1 Constituents of Concern

Based on the Phase 1 analytical data from groundwater monitoring well WW-4, NASA identified NDMA and 1,4-dioxane as the primary constituents of concern for this investigation. Several additional SVOC TICs in groundwater samples by SW-846 Method 8270D are of interest to NASA. These compounds are 2,5-dimethyl-1,4-dioxane, N-butyl-benzenesulfonamide (NBBS), and N, N-dimethyl-formamide. NASA

measured groundwater indicator parameters such as temperature, turbidity, pH, and conductivity prior to collection of each set of samples.

3.1.1 Analytical Methods

NASA collected and analyzed groundwater samples for the COPCs using the analytical methods and equipment indicated below:

- Groundwater indicator parameters field instruments
- NDMA approved low-level analytical method (Southwest Research Institute TAP 01-0403-015)
- 1,4-dioxane SW-846 Method 8270D with SIM
- SVOCs SW-846 Method 8270D

3.1.2 Groundwater Quality Control Samples

NASA collected groundwater samples and analyzed them as described in preceding sections of this plan and the NMED-approved WSTF Groundwater Monitoring Plan (GMP; NASA, 2021a). QC samples were collected to ensure quality and representativeness of field data generated during the investigation. Field QC samples were collected as follows:

- Low-level NDMA trip blanks were collected prior to proceeding to a well for purging and sampling activities and carried by the sampling crew throughout activity at each well. There were four trip blanks collected during the project.
- A set of field blanks for all analytical methods were collected at each Water FLUTe sampling interval.
- Adequate field duplicate samples were collected for all analytical methods to ensure that at least eight samples were collected for these analyses at each Water FLUTe sampling interval.
- One low-level NDMA matrix spike/matrix spike duplicate sample was collected at each Water FLUTe sampling interval.

QC samples collected during this investigation are provided in <u>Table 3.1</u>. Laboratory QC samples were analyzed as required by the accredited contracted laboratory's Quality Manual or Standard Operating Procedures.

3.2 Field Activities

3.2.1 WW-4 FLUTe Liner Installation

NASA retained the services of FLUTe to construct and install a new Water FLUTe sampling system in well WW-4. NASA and FLUTe technicians installed the new liner on February 22 and 23, 2022. The new liner sampling zones were installed at the same depths as the removed (and damaged) liner, so the FLUTe sampling zones remain the same as with the previous liner. Following installation, each sampling zone was tested by purging using gaseous nitrogen at a pressure of 225 pounds per square inch (psi). Each zone produced water slowly at 225 psi, so the test pressure was raised to 250 psi. Each zone produced approximately ³/₄ gallon of groundwater per each purge cycle. FLUTe technicians performed all installation and testing services and certified the proper installation and operation of the new liner. The logbook pages documenting liner installation at WW-4 are provided in <u>Appendix A</u>.

3.2.2 Serial Sampling of FLUTe Sampling Zones

NASA performed investigation fieldwork between May 9 and June 6, 2022. NASA completed serial sampling of each selected FLUTe zone in wells WW-4, BLM-32, JER-2, and WW-5 in accordance with the NMED-approved AIWP. FLUTe zones sampled are as follows:

- WW-4-423, screened from 419 to 429 feet (ft) below ground surface (bgs) (previously referred to as WW-4-419)
- WW-4-589, screened from 589 to 599 ft bgs
- WW-4-848, screened from 848 to 858 ft bgs
- WW-4-948, screened from 948 to 958 ft bgs
- BLM-32-543, screened from 543 to 563 ft bgs
- BLM-32-571, screened from 571 to 591 ft bgs
- JER-2-684, screened from 683.4 to 693.4 ft bgs
- WW-5-909, screened from 909 to 919 ft bgs

The FLUTe well construction details are shown on <u>Figure 3.1</u> (WW-4), <u>Figure 3.2</u> (BLM-32), <u>Figure 3.3</u> (JER-2), and <u>Figure 3.4</u> (WW-5). Serial sampling was completed at each zone at five purge volume intervals:

- Initial groundwater samples were collected from the drop pipe prior to purging and are provided in <u>Table 3.1</u> as "0" under Cumulative Purge Volume, in gallons.
- The second, third, fourth, and fifth groundwater samples were collected following purging of each FLUTe zone at intervals of 4, 8, 13, and 17 gallons, and are provided as "4," "8," "13," and "17" under the Cumulative Purge Volume column of <u>Table 3.1</u>.

NASA collected all groundwater samples in accordance with the GMP (NASA, 2021a) requirements and the approved AIWP (NASA, 2022). Field activities are documented in logbooks, provided in <u>Appendix A</u>.

Serial sampling events should ideally be completed in a continuous manner, with initiation of each subsequent purge/sample event immediately following completion of the previous purge/sampling event. However, NASA was unable to complete serial sampling in this manner because of the time required to purge each FLUTe internal and competent personnel were tasked with several other project activities concurrently with this investigation. Project personnel completed the serial sampling as quickly as possible under these constraints, but completion of purging/sampling activities at each FLUTe zone required multiple days as shown in <u>Table 3.1</u>.

3.3 Performance or Acceptance Criteria

The purpose of this investigation was to determine if the detections of constituents of concern at eight FLUTe sampling zones are representative of groundwater conditions or the result of contamination introduced by leaching of Water FLUTe sampling system components into groundwater in contact with the FLUTe materials. The Phase 2 investigation was conducted to comply with NMED direction to evaluate groundwater sampling data representativeness (NMED, 2016, 2017a).

QC samples were collected using deionized filtered water that met or exceeded the qualifications for ASTM International Type 1 water. Equipment blank samples were collected using deionized filtered water that was run through the wellhead manifold and flow meter. Analytical data from equipment blanks were evaluated to ensure cross contamination did not occur. Field blank samples were collected using deionized filtered water in conjunction with groundwater samples during fieldwork. Analytical data from

field blanks were evaluated to ensure field contamination did not negatively affect sample data quality. Analytical data from trip blank samples were evaluated to ensure possible contamination from the shipping process did not negatively affect sample data quality. The number and type of QC samples for this investigation are summarized in <u>Table 3.1</u>.

3.4 Investigation-Derived Waste Management

NASA managed all investigation-derived waste (IDW) in accordance with 40 Code of Federal Regulations (CFR) 262.17 and 20.4.1.300 New Mexico Administrative Code (NMAC) and the approved AIWP. All groundwater and decontamination fluids generated were transferred to the onsite Mid-plume Interception and Treatment System (MPITS), where it was treated in accordance with the MPITS Interim Measure Work Plan (NASA, 2008) and discharged in accordance with DP-1255 (NMED, 2017a).

3.5 Investigation Deviations

NASA did not complete any activities other than those approved in the AIWP (NASA, 2022).

4.0 Investigation Results and Interpretation

Analytical results from the groundwater samples collected at the eight FLUTe zones in the four wells are provided in Enclosure 2. The laboratory analytical reports are provided in Enclosure 3. Detections for COPCs are summarized in the following sections.

4.1 WW-4-423 Serial Sample Results

NASA collected five sets of groundwater samples from FLUTe zone WW-4-423 on May 9 through 11, 2022. The initial sample was collected prior to purging actions (0 gallons) followed by sample collection following purging to remove 4, 8, 13, and 17 gallons.

<u>Table 4.1</u> presents the analytical results of the five serial sampling events for the COPCs. The TIC N,N-dimethylformamide was not detected (ND) in any sample. As anticipated, the pre-purge (0 gallons) samples generally had the highest concentrations of COPCs. Figure 4.1 provides graphs of the analytical results of each COPC for each serial sampling event, including a graph of NDMA, a graph of 1,4-dioxane, and a graph of the TICs NBBS, 2,5-dimethyl-1,4-dioxane, and N, N-dimethylformamide.

4.1.1 WW-4-423 NDMA

The highest detected concentrations of NDMA identified in this FLUTe zone during the two most recent years of sampling are 0.99 ng/L (9/15/2018) and 0.94 ng/L (6/18/2019). The pre-purge sample identified NDMA at 113.34 ng/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified NDMA concentrations that decreased from 7.51 (4 gallons) to 2.11 ng/L (17 gallons).

Concentrations of NDMA generally decreased with each subsequent purge/sampling event. The one exception occurred with the 13-gallon purge/sample (5/11/2022) that contained 5.44 ng/L NDMA that is greater than the 8-gallon purge/sample (5/10/2022) that contained 3.97 ng/L NDMA.

4.1.2 WW-4-423 1,4-Dioxane

The highest detected concentrations of 1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling are 21 μ g/L (6/29/2016) and 2 μ g/L (6/14/2018). The pre-purge sample

identified 1,4-dioxane at 95 μ g/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified 1,4-dioxane concentrations that decreased from 1.6 (4 gallons) to 0.85 μ g/L (8 gallons), then increased to 3.1 μ g/L (13 gallons) and 8.3 μ g/L (17 gallons).

4.1.3 WW-4-423 Tentatively Identified Compounds

The highest detected concentrations of NBBS identified in this FLUTe zone during the two most recent years of sampling are 320 μ g/L (9/15/2018) and 260 μ g/L (6/18/2019). Serial samples collected identified NBBS concentrations at 10 μ g/L (0 gallons), 220 μ g/L (4 gallons), 68 μ g/L (8 gallons), was ND in the 13-gallon sample, and 24 μ g/L (17 gallons).

The highest detected concentrations of 2,5-dimethyl-1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling are 13 μ g/L (12/15/2018) and 7.1 μ g/L (6/18/2019). Serial samples collected identified 2,5-dimethyl-1,4-dioxane concentrations at 190 μ g/L (0 gallons), 7.4 μ g/L (4 gallons), and 13 μ g/L (13 gallons). 2,5-dimethyl-1,4-dioxane was ND in the 8- and 17-gallon samples.

N, N-dimethylformamide has not been detected in historical samples from WW-4-423 and was ND in any serial samples collected from this FLUTe zone.

4.2 WW-4-589 Serial Sample Results

NASA collected five sets of groundwater samples from FLUTe zone WW-4-589 on May 9 through 11, 2022. The initial sample was collected prior to purging actions (0 gallons) followed by sample collection following purging to remove 4, 8, 13, and 17 gallons.

<u>Table 4.1</u> presents the analytical results of the five serial sampling events for the COPCs. <u>Figure 4.2</u> provides graphs of the analytical results of each COPC for each serial sampling event, including a graph of NDMA, a graph of 1,4-dioxane, and a graph of the TICs NBBS, 2,5-dimethyl-1,4-dioxane, and N, N-dimethylformamide.

4.2.1 WW-4-589 NDMA

The highest detected concentrations of NDMA identified in this FLUTe zone during the two most recent years of sampling are 7 ng/L (3/15/2018) to 1 ng/L (6/18/2019). The pre-purge sample identified NDMA at 104.32 ng/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified NDMA concentrations that decreased from 3.72 (4 gallons) to 0.58 ng/L (17 gallons).

Concentrations of NDMA generally decreased with each subsequent purge/sampling event. The one exception occurred with the 13-gallon purge/sample (5/11/2022) that contained 0.99 ng/L NDMA that is greater than the 8-gallon purge/sample (5/10/2022) that contained 0.62 ng/L NDMA.

4.2.2 WW-4-589 1,4-Dioxane

The highest detected concentrations of 1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling are 50 μ g/L (6/29/2016) and 28 μ g/L (6/14/2018). The pre-purge sample identified 1,4-dioxane at 95 μ g/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified 1,4-dioxane concentrations that remained relatively steady for each purge/sample event at 1.1 μ g/L (4 gallons), 0.49 μ g/L (8 gallons), 2.9 μ g/L (13 gallons) and 1.8 μ g/L (17 gallons).

4.2.3 WW-4-589 Tentatively Identified Compounds

The highest detected concentrations of NBBS identified in this FLUTe zone during the two most recent years of sampling are 320 μ g/L (9/15/2018) and 260 μ g/L (6/18/2019). Serial samples collected identified NBBS concentrations at 35 μ g/L (4 gallons), 17 μ g/L (8 gallons), and 9.4 μ g/L (17 gallons), was ND at 0- and 13-gallon samples.

The highest detected concentrations of 2,5-dimethyl-1,4-dioxane identified in this FLUTe during the two most recent years of sampling are 3.9 μ g/L (6/14/2018) and 5.1 μ g/L (3/19/2019). Serial samples collected identified 2,5-dimethyl-1,4-dioxane concentrations at 210 μ g/L (0 gallons), 5.7 μ g/L (4 gallons), and 15 μ g/L (13 gallons). 2,5-dimethyl-1,4-dioxane was ND in the 8- and 17-gallon samples.

N, N-dimethylformamide has not been detected in historical samples from WW-4-589 and was ND in any serial samples collected from this FLUTe zone.

4.3 WW-4-848 Serial Sample Results

NASA collected five sets of groundwater samples from FLUTe zone WW-4-848 on May 12 through 16, 2022. The initial sample was collected prior to purging actions (0 gallons purge) followed by sample collection following purging to remove 4, 8, 13, and 17 gallons.

<u>Table 4.1</u> presents the analytical results of the five serial sampling events for the COPCs. <u>Figure 4.3</u> provides graphs of the analytical results of each COPC for each serial sampling event, including a graph of NDMA, a graph of 1,4-dioxane, and a graph of the TICs NBBS, 2,5-dimethyl-1,4-dioxane, and N, N-dimethylformamide.

4.3.1 WW-4-848 NDMA

The highest detected concentrations of NDMA identified in this FLUTe zone during the two most recent years of sampling are 1 ng/L (6/19/2018) to 0.33 ng/L (3/21/2019). The pre-purge sample identified NDMA at 122.43 ng/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified NDMA concentrations that remained relatively consistent at 0.49 ng/L (4 gallons), 0.91 ng/L (8 gallons), 0.73 ng/L (13 gallons), and 0.46 ng/L (17 gallons).

Concentrations of NDMA generally decreased with each subsequent purge/sampling event. The one exception occurred with the 8-gallon purge/sample (5/13/2022) that contained 0.91 ng/L NDMA that is greater than the 4-gallon purge/sample (5/12/2022) that contained 0.62 ng/L NDMA.

4.3.2 WW-4-848 1,4-Dioxane

The only detected concentration of 1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling is 1.8 μ g/L (6/19/2018). The pre-purge sample identified 1,4-dioxane at 120 μ g/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified 1,4-dioxane concentrations that remained relatively steady for each purge/sample event at 1.8 μ g/L (4 gallons), 2.3 μ g/L (8 gallons), 1.5 μ g/L (13 gallons) and 1.6 μ g/L (17 gallons).

4.3.3 WW-4-848 Tentatively Identified Compounds

The highest detected concentrations of NBBS identified in this FLUTe zone during the two most recent years of sampling are 110 μ g/L (6/19/2018) and 67 μ g/L (3/21/2019). Serial samples collected following

purging activities identified NBBS concentrations at 12 μ g/L (4 gallons), 6.4 μ g/L (8 gallons), 5.6 μ g/L (13 gallons), and 7.8 μ g/L (17 gallons), was ND in the 0-gallon sample.

The highest detected concentrations of 2,5-dimethyl-1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling are 17 μ g/L (1/3/2018) and 11 μ g/L (3/21/2019). Serial samples collected identified 2,5-dimethyl-1,4-dioxane concentrations at 170 μ g/L (0 gallons) but this TIC was ND in the remaining serial samples.

N, N-dimethylformamide has not been detected in historical samples from WW-4-848, but was identified at 27 μ g/L (4 gallons) and 11 μ g/L (13 gallons), and was ND in the 0-, 8-, or 17-gallon samples collected from this FLUTe zone.

4.4 WW-4-948 Serial Sample Results

NASA collected five sets of groundwater samples from FLUTe zone WW-4-948 on May 12 through 16, 2022. The initial sample was collected prior to purging actions (0 gallons) followed by sample collection following purging to remove 4, 8, 13, and 17 gallons.

<u>Table 4.1</u> presents the analytical results of the five serial sampling events for the COPCs. <u>Figure 4.4</u> provides graphs of the analytical results of each COPC for each serial sampling event, including a graph of NDMA, a graph of 1,4-dioxane, and a graph of the TICs NBBS, 2,5-dimethyl-1,4-dioxane, and N, N-dimethylformamide.

4.4.1 WW-4-948 NDMA

The highest detected concentrations of NDMA identified in this FLUTe zone during the two most recent years of sampling are 3.6 ng/L (3/20/2018) and 2.8 ng/L (6/20/2019). The pre-purge sample identified NDMA at 71.1 ng/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified NDMA concentrations that remained consistent at 0.48 ng/L (4 gallons), 0.48 ng/L (8 gallons), 0.47 ng/L (13 gallons), and 0.49 ng/L (17 gallons).

4.4.2 WW-4-948 1,4-Dioxane

The only detected concentration of 1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling is 1.5 μ g/L (6/19/2018). The pre-purge sample identified 1,4-dioxane at 160 μ g/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified 1,4-dioxane concentrations that remained relatively steady for each purge/sample event at 2.4 μ g/L (4 gallons), 6.2 μ g/L (8 gallons), 1.3 μ g/L (13 gallons) and 1.8 μ g/L (17 gallons).

4.4.3 WW-4-948 Tentatively Identified Compounds

The highest detected concentrations of NBBS identified in this FLUTe zone during the two most recent years of sampling are 1500 μ g/L (6/19/2018) and 38 μ g/L (6/20/2019). Serial samples collected identified NBBS concentrations at 310 μ g/L (0 gallons), 8.8 μ g/L (4 gallons), 5.9 μ g/L (8 gallons), and 5.5 μ g/L (17 gallons). It was ND in the 13-gallon sample.

The highest detected concentrations of 2,5-dimethyl-1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling are 18 μ g/L (1/3/2018) and 8.5 μ g/L (3/21/2019). Serial samples collected identified 2,5-dimethyl-1,4-dioxane concentrations at 200 μ g/L (0 gallons) but this TIC was ND in the remaining serial samples.

The highest detected concentrations of N, N-dimethylformamide in this FLUTe zone during the two most recent years of sampling are 23 μ g/L (1/6/2017) and 7.8 μ g/L (9/18/2018). It was detected in WW-4-848 at 27 μ g/L (4 gallons) and 11 μ g/L (13 gallons), but was ND in the 0-, 8-, or 17-gallon samples collected from this FLUTe zone.

4.5 BLM-32-543 Serial Sample Results

NASA collected five sets of groundwater samples from FLUTe zone BLM-32-543 on May 16 through 23, 2022. The initial sample was collected prior to purging actions (0 gallons) followed by sample collection following purging to remove 4, 8, 13, and 17 gallons.

<u>Table 4.1</u> presents the analytical results of the five serial sampling events for the COPCs. <u>Figure 4.5</u> provides graphs of the analytical results of each COPC for each serial sampling event, including a graph of NDMA, a graph of 1,4-dioxane, and a graph of the TICs NBBS, 2,5-dimethyl-1,4-dioxane, and N, N-dimethylformamide.

4.5.1 BLM-32-543 NDMA

The highest detected concentrations of NDMA identified in this FLUTe zone during the two most recent years of sampling are 3.4 ng/L (2/12/2020) to 2.7 ng/L (2/2/2021). The pre-purge sample identified NDMA at 3.18 ng/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified NDMA concentrations that decreased from 1.68 ng/L (4 gallons) to 0.48 ng/L (8 gallons), then remained consistent at 0.49 ng/L (13 gallons), and 0.47 ng/L (17 gallons).

4.5.2 BLM-32-543 1,4-Dioxane

The only detected concentration of 1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling is 11 μ g/L (8/7/2018). The pre-purge sample identified 1,4-dioxane at 5.1 μ g/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified 1,4-dioxane concentrations that slightly decreased from 1.6 μ g/L (4 gallons), 1.2 μ g/L (8 gallons), and 0.79 μ g/L (13 gallons), but increased slightly to 1.2 μ g/L (17 gallons).

4.5.3 BLM-32-543 Tentatively Identified Compounds

The highest detected concentrations of NBBS identified in this FLUTe zone during the two most recent years of sampling are 37 μ g/L (11/30/2020) and 2200 μ g/L (8/9/2021). Serial samples collected identified NBBS concentrations decreasing with each subsequent purge/sample event at 2200 μ g/L (0 gallons), 1800 μ g/L (4 gallons), 1600 μ g/L (8 gallons), 1400 μ g/L (13 gallons), and 960 μ g/L (17 gallons).

The highest detected concentrations of 2,5-dimethyl-1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling are 6.1 μ g/L (2/12/2020) and 10 μ g/L (2/2/2021). Serial samples collected identified 2,5-dimethyl-1,4-dioxane concentrations at 12 μ g/L (0 gallons) but this TIC was ND in the remaining serial samples.

The highest detected concentrations of N, N-dimethylformamide in this FLUTe zone during the two most recent years of sampling are 15 μ g/L (6/8/2016) and 7.9 μ g/L (2/7/2017) in WW-4-848. It was ND in the serial samples collected from this FLUTe zone.

4.6 BLM-32-571 Serial Sampling Results

NASA collected five sets of groundwater samples from FLUTe zone BLM-32-571 on May 16 through 23, 2022. The initial sample was collected prior to purging actions (0 gallons) followed by sample collection following purging to remove 4, 8, 13, and 17 gallons.

<u>Table 4.1</u> presents the analytical results of the five serial sampling events for the COPCs. <u>Figure 4.6</u> provides graphs of the analytical results of each COPC for each serial sampling event, including a graph of NDMA, a graph of 1,4-dioxane, and a graph of the TICs NBBS, 2,5-dimethyl-1,4-dioxane, and N, N-dimethylformamide.

4.6.1 BLM-32-571 NDMA

The highest detected concentrations of NDMA identified in this FLUTe zone during the two most recent years of sampling are 2.4 ng/L (5/5/2020) and 1.1 ng/L (2/2/2021). The pre-purge sample identified NDMA at 5.44 ng/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified NDMA concentrations that increased from 0.86 ng/L (4 gallons) to 1.04 ng/L (8 gallons), then stabilized at 0.5 ng/L (13 gallons), and 0.47 ng/L (17 gallons).

4.6.2 BLM-32-571 1,4-Dioxane

The only detected concentration of 1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling is 11 μ g/L (8/7/2018). The pre-purge sample identified 1,4-dioxane at 5.1 μ g/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified 1,4-dioxane concentrations that slightly decreased from 1.6 μ g/L (4 gallons), 1.2 μ g/L (8 gallons), and 0.79 μ g/L (13 gallons), but increased slightly to 1.2 μ g/L (17 gallons).

4.6.3 BLM-32-571 Tentatively Identified Compounds

The highest detected concentrations of NBBS identified in this FLUTe zone during the two most recent years of sampling are 470 μ g/L (2/24/2016) and 200 μ g/L (2/8/2017). Serial samples collected identified NBBS concentrations decreasing with each subsequent purge/sample event at 94 μ g/L (0 gallons), 14 μ g/L (4 gallons), and 7.4 μ g/L (8 gallons) and was ND in the 13- and 17-gallon samples.

The single detected concentrations of 2,5-dimethyl-1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling is 8.7 μ g/L (8/31/2016). Serial samples collected identified 2,5-dimethyl-1,4-dioxane concentrations at 12 μ g/L (0 gallons) but this TIC was ND in the remaining serial samples.

N, N-dimethylformamide has not been detected in historical samples from this FLUTe zone and was ND in the serial samples collected from this FLUTe zone.

4.7 JER-2-684 Serial Sampling Results

NASA collected five sets of groundwater samples from FLUTe zone JER-2-684 on May 24 through 27, 2022. The initial sample was collected prior to purging actions (0 gallons) followed by sample collection following purging to remove 4, 8, 13, and 17 gallons.

<u>Table 4.1</u> presents the analytical results of the five serial sampling events for the COPCs. <u>Figure 4.7</u> provides graphs of the analytical results of each COPC for each serial sampling event, including a graph

of NDMA, a graph of 1,4-dioxane, and a graph of the TICs NBBS, 2,5-dimethyl-1,4-dioxane, and N, N-dimethylformamide.

4.7.1 JER-2-684 NDMA

The highest detected concentrations of NDMA identified in this FLUTe zone during the two most recent years of sampling are 43 ng/L (7/21/2020) and 7.7 ng/L (10/13/2021). The pre-purge sample identified NDMA at 48.3 ng/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified NDMA concentrations that increased from 1.64 ng/L (4 gallons) to 1.74 ng/L (8 gallons), decreased to 0.49 ng/L (13 gallons), then increased to 2.3 ng/L (17 gallons).

4.7.2 JER-2-684 1,4-Dioxane

The highest detected concentrations of 1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling are 73 μ g/L (7/21/2020) and 57 μ g/L (1/14/2021). The pre-purge sample identified 1,4-dioxane at 30 μ g/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified 1,4-dioxane concentrations that decreased for each purge/sample event at 4 μ g/L (4 gallons), 3.8 μ g/L (8 gallons), 0.36 μ g/L (13 gallons) and 0.17 μ g/L (17 gallons).

4.7.3 JER-2-684 Tentatively Identified Compounds

The highest detected concentrations of NBBS identified in this FLUTe zone during the two most recent years of sampling are 40 μ g/L (10/27/2020) and 160 μ g/L (10/13/2021). Serial samples collected identified NBBS concentrations decreasing with each subsequent purge/sample event at 420 μ g/L (0 gallons), 240 μ g/L (4 gallons), 210 μ g/L (8 gallons), 160 μ g/L (13 gallons), and 120 μ g/L (17 gallons).

The highest detected concentrations of 2,5-dimethyl-1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling is 14 μ g/L (10/27/2020) and 8.2 μ g/L (1/14/2021). Serial samples collected identified 2,5-dimethyl-1,4-dioxane concentrations at 12 μ g/L (0 gallons) but this TIC was ND in the remaining serial samples.

N, N-dimethylformamide was detected in one sample during the two most recent years of sampling at 5.6 μ g/L (7/14/2017), but was ND in the serial samples collected from this FLUTe zone.

4.8 WW-5-909 Serial Sampling Results

NASA collected five sets of groundwater samples from FLUTe zone WW-5-909 on May 31 through June 6, 2022. The initial sample was collected prior to purging actions (0 gallons) followed by sample collection following purging to remove 4, 8, 13, and 17 gallons.

<u>Table 4.1</u> presents the analytical results of the five serial sampling events for the COPCs. <u>Figure 4.8</u> provides graphs of the analytical results of each COPC for each serial sampling event, including a graph of NDMA, a graph of 1,4-dioxane, and a graph of the TICs NBBS, 2,5-dimethyl-1,4-dioxane, and N, N-dimethylformamide.

4.8.1 WW-5-909 NDMA

The highest detected concentrations of NDMA identified in this FLUTe zone during the two most recent years of sampling are 5 ng/L (1/16/2020) to 6.5 ng/L (4/13/2021). The pre-purge sample identified a low

concentration of NDMA at 1.46 ng/L, then increased to 3.08 ng/L (4 gallons) and decreased steadily to 2.37 ng/L (8 gallons), 1.81 ng/L (13 gallons), and 1.56 ng/L (17 gallons).

4.8.2 WW-5-909 1,4-Dioxane

The highest detected concentrations of 1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling are 22 μ g/L (7/19/2018) and 18 μ g/L (10/12/2018). The pre-purge sample identified 1,4-dioxane at 14 μ g/L, but is not considered indicative of formation water. Serial samples collected following purging activities identified 1,4-dioxane concentrations that decreased for each purge/sample event to 3.7 μ g/L (4 gallons), 3.3 μ g/L (8 gallons), 3.2 μ g/L (13 gallons) and 0.43 μ g/L (17 gallons).

4.8.3 WW-5-909 Tentatively Identified Compounds

The highest detected concentrations of NBBS identified in this FLUTe zone during the two most recent years of sampling are 720 μ g/L (10/22/2020) and 1100 μ g/L (10/20/2021). Serial samples collected identified NBBS concentrations increasing from 720 μ g/L (0 gallons) to 920 μ g/L (4 gallons), then decreasing to 590 μ g/L (8 gallons), 500 μ g/L (13 gallons) and increasing to 580 μ g/L (17 gallons).

The highest detected concentrations of 2,5-dimethyl-1,4-dioxane identified in this FLUTe zone during the two most recent years of sampling is 30 μ g/L (7/19/2018) and 4.6 μ g/L (10/24/2019). Serial samples collected did not identify 2,5-dimethyl-1,4-dioxane in the remaining serial samples.

N, N-dimethylformamide was ND in historical samples over the last two years that this zone was sampled and was ND in the serial samples collected from this FLUTe zone.

4.9 Historical NDMA Concentrations Comparison

NASA compared historical NDMA concentrations with the concentrations identified during serial sampling. NASA selected the most recent two years of NDMA analytical results from each FLUTe zone evaluated as part of this investigation. NDMA concentrations from the pre-purge samples (0 gallons) are not considered representative of formation groundwater and were not included in this comparison. Results of these comparisons are described in the following sections.

4.9.1 WW-4-423

Figure 4.9 shows two graphs: the first is the historical NDMA concentrations identified over the last two years of sampling completed prior to this investigation, and the second is the NDMA concentrations from the 4-, 8-, 13-, and 17-gallon purge samples. Historical NDMA in this zone ranged from 0.99 to 0.31 ng/L, while samples from this investigation identified an NDMA range of 7.51 to 2.11 ng/L. While in the same order of magnitude as historical concentrations, NDMA has increased in samples collected during this investigation.

4.9.2 WW-4-589

Figure 4.10 shows the historical NDMA graph and the serial sampling NDMA graph. Historical NDMA in this zone ranged from 7 to 0.4 ng/L, while samples from this investigation identified an NDMA range of 3.72 to 0.58 ng/L. Historic and serial sampling NDMA concentrations are remarkably consistent in this FLUTe zone in groundwater samples.

4.9.3 WW-4-848

Figure 4.11 shows the historical NDMA graph and the serial sampling NDMA graph. Historical NDMA in this zone ranged from 1 to <0.23 ng/L (below reporting limit), while samples from this investigation identified an NDMA range of 0.91 to <0.46 ng/L (below reporting limit). Historic and serial sampling NDMA concentrations are remarkably consistent in this FLUTe zone in groundwater samples.

4.9.4 WW-4-948

<u>Figure 4.12</u> shows the historical NDMA graph and the serial sampling NDMA graph. Historical NDMA in this zone ranged from 3.6 to 2 ng/L, while samples from this did not identify NDMA at concentrations above the reporting limit, at <0.49 to <0.47 ng/L. Historic NDMA concentrations are noticeably higher than NDMA concentrations identified during this investigation.

4.9.5 BLM-32-543

<u>Figure 4.13</u> shows the historical NDMA graph and the serial sampling NDMA graph. Historical NDMA in this zone ranged from 3.4 to 1.5 ng/L, while samples from this investigation identified an NDMA range of 1.68 ng/L to <0.47 ng/L (below the reporting limit). Historic NDMA concentrations are noticeably higher than NDMA concentrations identified during this investigation.

4.9.6 BLM-32-571

Figure 4.14 shows the historical NDMA graph and the serial sampling NDMA graph. Historical NDMA in this zone ranged from 2.4 to <0.22 ng/L, while samples from this investigation identified an NDMA range of 1.04 ng/L to 0.5 ng/L. Historic NDMA concentrations are inconsistent with more fluctuations in concentrations, while NDMA concentrations identified during this investigation are consistently at or below 1 ng/L.

4.9.7 JER-2-684

Figure 4.15 shows the historical NDMA graph and the serial sampling NDMA graph. Historical NDMA in this zone ranged from 7.7 to <0.23 ng/L, while samples from this investigation identified an NDMA range of 2.3 ng/L to <0.49 ng/L. Historic NDMA concentrations are inconsistent with more fluctuations in concentrations, while NDMA concentrations identified during this investigation are consistently at or below 2.5 ng/L.

4.9.8 WW-5-909

Figure 4.16 shows the historical NDMA graph and the serial sampling NDMA graph. Historical NDMA in this zone ranged from 6.5 to 1.7 ng/L, while samples from this investigation identified an NDMA range of 3.08 ng/L to 1.56 ng/L. Historic NDMA concentrations are inconsistent with more fluctuations in concentrations, while NDMA concentrations identified during this investigation are consistently at or below 3 ng/L.

4.10 Tentatively Identified Compounds

NASA compared concentrations of NDMA with concentrations of the three TICs, 2,5-dimethyl-1,4dioxane, NBBS, and N, N-dimethyl-formamide for each sample event at each FLUTe zone. Analytical results of TICs for each sample are shown in <u>Table 4.1</u>, and graphs of TIC concentrations are shown on Figure 4.1 through Figure 4.8. 2,5-Dimethyl-1,4-dioxane was detected in 11 of the 40 samples, NBBS in 33 of 40, and N, N-dimethyl-formamide in two of 40 samples.

The TIC NBBS was identified in 82.5% of samples, so results of comparison with WSTF COC concentrations is more reliable than with the remaining two TICs. One notable difference in NBBS concentrations and concentrations of NDMA and 1,4-dioxane is that in the upper three FLUTe zones in WW-4, the pre-purge (0-gallon) NBBS concentrations were much lower than subsequent samples collected from these zones, while NDMA and 1.4-dioxane concentrations generally declined with each subsequent purge/sample event. Correlation between NBBS and WSTF COC concentrations is not apparent. The age of FLUTe liners appears to have a significant effect on NBBS concentrations, with NBBS at significantly higher concentrations in BLM-32, JER-2, and WW-5 than were identified in any of the WW-4 samples, indicating leaching of NBBS is increasing over time in FLUTe systems. No other apparent conclusions can be drawn from this comparison.

The low occurrence of 2,5-dimethyl-1,4-dioxane, identified in 27.5% of samples, and N, N-dimethylformamide, identified in 5% of samples, introduces uncertainty when evaluating these concentrations with WSTF COCs. N, N-dimethyl-formamide was not compared with WSTF COCs. Concentrations of 2,5dimethyl-1,4-dioxane were identified in all pre-purge (0-gallon) samples (except at WW-5-909), and in the 4-gallon and 8-gallon samples from WW-4-423 and WW-4-589. Pre-purge concentrations were much higher than those from purged samples in WW-4 zones, and somewhat correlate to 1,4-dioxane concentration decreases in those samples. However, the low occurrence rate introduces uncertainty to any comparison with WSTF COCs.

4.11 Quality Control Samples

Unlike the Phase 1 investigation, NDMA was ND in the field blank samples collected for the low-level analytical method. Duplicate sample results closely matched the corresponding primary sample results in most samples collected and analyzed. Six duplicate samples (of 60 total samples) were flagged "QD" to indicate that the precision for a field duplicate was outside standard limits.

Additionally, one sample, the 13-gallon from WW-4-423, was flagged "SP" indicating that either the spike recovery or the relative percent difference for spike duplicates was outside standard limits.

NASA evaluated the higher of the primary or duplicate sample NDMA concentration in all instances. The effect of the field duplicate and spiked sample precision outside standard limits is considered minimal, and these data are appropriate to support the objective of this investigation.

Data flags for the 1,4-dioxane results indicate similar results as with the NDMA. The occurrence of the "QD" flags was slightly higher than with NDMA, with twelve of 60 samples flagged. In all cases, NASA evaluated the higher of the two (primary or duplicate) sample concentration during this investigation. The effect of the field duplicate sample precision outside standard limits is considered minimal, and these data are appropriate to support the objective of this investigation.

5.0 Uncertainties

NDMA concentrations in groundwater samples collected during this investigation of well WW-4 are not likely subject to uncertainty when considering detections of NDMA in the accompanying QC samples. The identified data quality issues with NDMA samples are limited to duplicate and spike sample precision being outside standard limits. In all cases NASA used the higher of the primary or duplicate sample result to evaluate the effect of increased purge volumes on NDMA results. Of the 40 samples

collected from the eight FLUTe zones, six of these samples were flagged, representing 15% of the total samples. Likewise 1,4-dioxane samples flagged "QD" represent 20% of the total samples.

Fluctuations in COPC concentrations may be attributed to the execution of serial purging and sampling of FLUTe zones over multiple days because of previously discussed project constraints. In some instances, analytical results indicate that when a subsequent purge/sample event was not completed on the same day as the previous purge/sample cycle, there was an increase in COPC concentrations when compared with the previous purge/sample COPC concentrations.

6.0 Conclusions

This FLUTe data representativeness evaluation compared a time series of sampling event concentrations from eight FLUTe zones in wells WW-4, BLM-32, JER-2, and WW-5. This investigation included four FLUTe zones from a new liner system installed in WW-4, and included four zones from wells in which FLUTe liners have been installed and sampled over several years. Serial sampling was performed by collecting samples representing pre-purge water in the FLUTe system and samples collected following purging of 1, 2, 3, and 4 sample system volumes. Analytical results from the serial sampling events were also compared with COPC concentrations identified during scheduled groundwater sampling performed in accordance with the GMP. The evaluation shows the following:

- Serial sampling activities conducted during this investigation have identified potential issues with established WSTF FLUTe sampling procedures that may affect sample quality. NASA revised these procedures to assure samples represent formation groundwater by requiring sample collection immediately after purging the minimum volume required for each zone. In all cases a minimum of four gallons will be purged from all FLUTe zones.
- NDMA concentrations through the serial sampling events at the eight FLUTe zones were consistent with historical concentrations in groundwater samples collected from the Water FLUTe system. Based on the evaluation of NDMA detections presented in this report, NASA concludes that NDMA concentrations in groundwater samples collected from the Water FLUTe system may be representative of groundwater, though uncertainty remains due to the variable nature of detections from Water FLUTe systems.
- NDMA concentrations compared with concentrations of 1,4-dioxane and the three TICs evaluated herein does not indicate the presence of 1,4-dioxane and the three TICs in groundwater have a causal effect on NDMA concentrations. There was no obvious correlation between concentrations of NDMA and other constituents.
- The age of each FLUTe liner influences the occurrence of NBBS. Older FLUTe liners may be leaching NBBS at increasing rates with time.

The purpose of this investigation was to determine if the detections of constituents of concern at the eight FLUTe zones will decrease with increased purging prior to sampling. The greatest reduction in NDMA concentrations occurred following purging of the first sampling system volume and did not appreciably decrease with additional purging. Therefore, NASA concludes that significant additional purging of Water FLUTe systems is not likely to impact the detection of the COPCs evaluated in this investigation.

7.0 Recommendations

Based on the regulatory criteria and decision rule provided in the NMED-approved abbreviated work plan (NASA, 2021d), the results of the Phase 2 investigation summarized in Section 4.0 and the conclusions drawn from those results summarized in Section 6.0, NASA recommends continued use of FLUTe

systems for collection of groundwater samples from wells with multiple screened intervals. Results of this investigation has prompted NASA to revise sampling procedures to assure samples represent formation groundwater by requiring sample collection immediately after purging the minimum volume from each zone. NASA recommends continued evaluation of WSTF COCs in groundwater samples collected from FLUTe systems to determine if the procedural changes affect COC concentrations.

Additionally, NASA recommends the minimum purge volumes remain unchanged from the current requirements of four gallons from wells BLM-32, JER-1, JER-2, ST-7, WW-4, and WW-5, and four and a half gallons from wells PL-11 and ST-6. COPC concentrations do not appreciably reduce following additional purging activities, but were minimally reduced in wells BLM-32, JER-2 and WW-5 by purging two cycles prior to sampling (8 gallons). Evaluation of future COC concentrations in samples collected using the revised procedures will provide additional information that will support changes to the established purge volumes.

NASA submitted the *NASA WSTF Westbay Well Reconfiguration Work Plan for Westbay Wells PL-7, PL-8, PL-10, ST-5, and WW-3* on April 29, 2021 (NASA, 2021b). NASA proposed to replace the Westbay systems in these wells with purgeable, multiport Water FLUTe sampling systems to improve the quality of groundwater samples collected for chemical analysis. The basis is that NDMA concentrations in this study are consistent with historical concentrations in groundwater samples collected from the Water FLUTe system. Alternatives to the Water FLUTe system for permanent purgeable sampling systems in general are under consideration, though NASA does not recommend any currently available options over the Water FLUTe system for existing multi-zone monitoring wells.

8.0 References

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Figures

Figure 2.1

FLUTe Phase 2 Well Location Map



Figure 3.1



Figure 3.2

BLM-32 Water FLUTe INSTALLATION DIAGRAM



Borehole Total Depth: 750'

Figure 3.3

JER-2 Water FLUTe Well Installation Diagram

Brass Cap: Coordinates: Borehole Diameter: 12.25" Surface Casing:

4,546.32 ft amsl 558,336.64 N; 1,517,273.62 E Casing and Screen: Nominal 6" SDR-17 PVC 14" Steel to 69'

Original Development Start Date: 12/7/03 Original Development End Date: 12/23/03 Redevelopment Dates: 10/8/16-10/19/16 FLUTe Well Installation Date: 1/5/17-1/6/17 Water FLUTe Sampling Zones: 503.5'-513.5' 583.5'-593.5' 683.5'-693.5'



Figure 3.4

WW-5 WATER FLUTe INSTALLATION DIAGRAM




WW-4-423 FLUTe Sampling Events Results







WW-4-589 FLUTe Sampling Events Results







WW-4-848 FLUTe Sampling Events Results







WW-4-948 FLUTe Sampling Events Results







BLM-32-543 FLUTe Sampling Events Results







BLM-32-571 FLUTe Sampling Events Results







JER-2-684 FLUTe Sampling Events Results





WW-5-909 FLUTe Sampling Events Results









WW-4-848 Historical NDMA

Figure 4.11



WW-4-948 Historical NDMA



Groundwater Data Representativeness Phase 2: Water FLUTe Well Evaluation AIR



Figure 4.14

BLM-32-571 Historical NDMA



Figure 4.15

JER-2-684 Historical NMDA



WW-5-909 Historical NDMA

Tables

FLUTe	Date of	Time Sa	mpled	Cumulative Purge Volume	Initial Field	LL-NDMA ¹	1,4-Dioxane by SVOC SIM ²	SVOC ³
Zone	Sample	Start	End	(gal)	Parameters	(QA)*	(QA) ⁴	(QA)*
WW-4-423	05/09/22	08:04	08:31	0	Х	X (D)	X (TB, FB)	X (FB, D)
	05/09/22	13:30	14:45	4	Х	X (D) (D)	X (D)	X (D)
	05/10/22	09:48	09:52	8	Х	X (D)	X (D)	Х
	05/11/22	06:47	07:13	13	Х	X (D)	X (MS/MSD)	X (D)
	05/11/22	13:33	14:36	17	Х	X (D)	X (D)	Х
WW-4-589	05/09/22	08:12	08:39	0	Х	X (FB)	X (FB)	X (FB)
	05/09/22	13:48	14:50	4	Х	X (D)	X (D)	X (D)
	05/10/22	10:14	10:18	8	Х	X (D)	X (MS/MSD)	Х
	05/11/22	07:02	07:23	13	Х	X (D)	X (D)	X (D)
	05/11/22	13:44	14:47	17	Х	Х	X (D)	X (D)
WW-4-848	05/12/22	07:05	07:10	0	Х	X (FB)	X (FB)	X (FB)
	05/12/22	10:07	10:48	4	Х	X (D)	X (MS/MSD)	X (D)
	05/13/22	07:10	07:43	8	Х	X (D)	X (D)	Х
	05/13/22	12:50	13:45	13	Х	X (D)	X (D)	X (D)
	05/16/22	09:50	09:54	17	Х	X (D)	X (D)	X (D)
WW-4-948	05/12/22	07:17	07:22	0	Х	X (FB)	X (FB)	X (FB)
	05/12/22	10:18	10:59	4	Х	X (D)	X (D)	X (D)
	05/13/22	07:21	07:48	8	Х	X (D)	X (MS/MSD)	Х
	05/13/22	13:16	13:55	13	Х	X (D)	X (D)	X (D)
	05/16/22	09:36	10:08	17	Х	X (D)	X (D)	X (D)
BLM-32-543	05/16/22	14:00	14:05	0	Х	X (FB)	X (TB, FB)	X (FB)
	05/17/22	13:40	14:21	4	Х	X (D)	X (D)	X (D)
	05/18/22	13:26	14:03	8	X	X (D)	X (D)	X
	05/19/22	13:16	14:21	13	X	X (D)	X (MS/MSD)	X (D)
	05/23/22	13:21	13:48	17	X	X (D)	X (D)	X

Table 3.1Phase 2 Investigation Sample Inventory

FLUTe	Date of	Time Sa	mpled	Cumulative Purge Volume	Initial Field	LL-NDMA ¹	1,4-Dioxane by SVOC SIM ²	SVOC ³
Zone	Sample	Start	End	(gal)	Parameters	(QA) ⁴	$(QA)^4$	(QA) ⁴
BLM-32-571	05/16/22	14:20	14:25	0	Х	X (FB)	X (FB)	X (FB)
	05/17/22	13:50	14:30	4	Х	X (D)	X (MS/MSD)	X (D)
	05/18/22	13:46	14:18	8	Х	X (D)	X (D)	Х
	05/19/22	13:36	14:10	13	Х	X (D)	X (D)	X (D)
	05/23/22	13:36	13:58	17	Х	X (D)	X (D)	X (D)
JER-2-684	05/24/22	07:30	07:35	0	Х	X (FB, D)	X (TB, FB)	Х
	05/24/22	13:21	13:52	4	Х	X (D)	X (D)	X (D)
	05/25/22	13:31	14:23	8	Х	X (D)	X (D)	Х
	05/26/22	13:01	13:45	13	Х	X (D)	X (MS/MSD)	X (D)
	05/27/22	13:00	13:30	17	Х	Х	X (D)	X (D)
WW-5-909	05/31/22	09:00	09:05	0	Х	X (FB)	X (TB, FB)	X (FB)
	05/31/22	13:01	13:34	4	Х	X (D)	X (D)	X (D)
	06/01/22	12:55	12:59	8	Х	X (D)	X (D)	Х
	06/02/22	12:52	13:49	13	Х	X (D)	X (MS/MSD)	X (D)
	06/06/22	13:16	13:20	17	X	X	X (D)	X (D)

NOTE:

1 – X indicates analyses of N-Nitrosodimethylamine using the NMED approved low-level analytical method (Southwest Research Institute TAP 01-0403-015).

2 - X indicates analyses of 1,4-dioxane using SW-846 Method 8270D with Selective Ion Monitoring.

3 – X indicates analyses of semi-volatile organic compounds using SW-846 Method 8270D.

4 – Quality Assurance samples: TB = trip blank, D = duplicate, FB = field blank, MS/MSD = matrix spike/matrix spike duplicate.

FLUTe Zone	Cumulative Purge Volume (gal)	LL-NDMA ¹ (ng/L)	1,4-Dioxane ² (µg/L)	2,5-dimethyl-1,4- dioxane ³ (µg/L)	N-butyl-benzene- sulfonamide ³ (µg/L)	N, N-dimethyl- formamide ³ (μg/L)
WW-4-423	0	113.34	150	190	10	ND
	4	7.51	1.6	7.4	220	ND
	8	3.97	0.85	ND	68	ND
	13	5.44	3.1	13	ND	ND
	17	2.11	8.3	ND	24	ND
WW-4-589	0	104.32	95	210	ND	ND
	4	3.72	1.1	5.7	35	ND
	8	0.62	0.49	ND	17	ND
	13	0.99	2.9	15	ND	ND
	17	0.58	1.8	ND	9.4	ND
WW-4-848	0	122.43	120	170	ND	ND
	4	0.49	1.8	ND	12	27
	8	0.91	2.3	ND	6.4	ND
	13	0.73	1.5	ND	5.6	11
	17	0.46	1.6	ND	7.8	ND
WW-4-948	0	71.1	160	200	310	ND
	4	0.48	2.4	ND	8.8	ND
	8	0.48	6.2	ND	8.9	ND
	13	0.47	1.3	ND	ND	ND
	17	0.49	1.8	ND	5.5	ND
BLM-32-543	0	3.18	5.1	12	2200	ND
	4	1.68	1.6	ND	1800	ND
	8	0.48	1.2	ND	1600	ND
	13	0.49	0.79	ND	1400	ND
	17	0.47	1.2	ND	960	ND

Table 4.1Phase 2 Investigation Serial Sample Results

Groundwater Data Representativeness Phase 2: Water FLUTe Well Evaluation AIR

FLUTe Zone	Cumulative Purge Volume (gal)	LL-NDMA ¹ (ng/L)	1,4-Dioxane² (μg/L)	2,5-dimethyl-1,4- dioxane ³ (μg/L)	N-butyl-benzene- sulfonamide ³ (µg/L)	N, N-dimethyl- formamide³ (μg/L)
BLM-32-571	0	0.86	0.78	ND	14	ND
	4	1.04	0.63	ND	7.4	ND
	8	0.5	0.52	ND	0	ND
	13	0.47	0.59	ND	0	ND
	17	48.3	30	42	420	ND
JER-2-684	0	1.64	4	ND	240	ND
	4	1.74	3.8	ND	210	ND
	8	0.49	0.36	ND	160	ND
	13	2.3	0.17	ND	120	ND
	17	1.46	14	ND	720	ND
WW-5-909	0	3.08	3.7	ND	920	ND
	4	2.37	3.3	ND	590	ND
	8	1.81	3.2	ND	500	ND
	13	1.56	0.43	ND	580	ND
	17	104.32	95	210	ND	ND

1 – Analyses of N-Nitrosodimethylamine using the NMED approved low-level analytical method (Southwest Research Institute TAP 01-0403-015).

2 – Analyses of 1,4-dioxane using SW-846 Method 8270D with Selective Ion Monitoring.

3 – Analyses of semi-volatile organic compounds using SW-846 Method 8270D. These three constituents are Tentatively Identified Compounds (TIC) defined as "Indicates that the analyte was tentatively identified by a GC/MS library search and the amount reported is an estimated value." Neither the method detection limit nor the reporting limit are listed for TICs.

ng/L – nanograms per liter.

 $\mu g/L$ – micrograms per liter.

Appendix A Field Logbooks

2-22-22 Tue Notebook No. MFP デフ PROJECT WW. 4 E/ute Linea Install Continued from page 0700 - K. Willing + S. Roas ageort FLUTE Crew to new y, FLUTE . Ien Sharp, Michael Sharp. 8730 - un lording veel at well. Hosphieting - set file copy - Torres & Helverson at site to tag DThs DTav- 407.65 btoc, 221/2" casing stick up. 0800 - Mib to Well J to get unchloriset a cue to for liner installation Plumpens - Supervison Victor Meza 575.644.9556 Joe Pelson 515.932.8115 Setting up to install. S. Roes good back to office to get Trout Cossidy. 0830 -5. Ross & T. Cassidy amice at ward 0920 -B. Burice & lastog-garage arrive. (Alex) 09.40 -Liner installation bogins. Initially, add ~ 20'of 1000 water "slug" to drive linen installation, to water level in well. 1036 - B. Barrick + Alex leave site. Wets - Lines insta (Ind to water level in well. Installed 120' for worker introduction during water line to inst-llation. Reel #1 (Linen) ingtelled 1150 - Lunch. Resure of 5. 1230 -Obtained 500 gal water from Well J. 1200 -Returned to wew & Making Consection between Linen (real #2) and tabing (real #2). Ingtalling tubing. 1500-Line anded . Stop for the day. 1700-Continued from page Read and Understood By With 2.22.22 Show Signed Date Signed 2-23-22

2-23-22 used. Notebook No. MFP Z 5 PROJECT WW-4 Fluty Lina Installation Continued from page 4 K. W: Ilians escorts FLUTE crows (Ims + Michael Sherp) 6700 --co ww-4 Hrs briefing - see file copy. 0715-0720 - T. Torves to De Halvorsan aver un al Dewar and Quick-connect fittings. Has prieted 0730 -Phillip Bolen arrives - H+5 briefed. warthe 45-65° F, clar, high winds forecast for the afternoon. Plan fri Today. - Conglete Surtate installation - Test properch of 4 sampling Zares. It. Unitions off sile to office to grab Barotroll I into on set parame 09/5 for Tionsduters FUTE presone checking transduer Enclique . 0927 Techs backing No traiter up to well head, setting up for propin 0943 A williams back on site ut ind is picking up quite a bit. 0950 - williams beck as site. 1005 - Begin test purge All 4 ports pargapersonte = 225 psi Na. 1015 - Slow purge on all 4 ports - bunged pressure to 250 psi Port 1 initial purge 5 3/4 gal Vort Z 11 e j Powt 3 11 Port 4 Withing met Trent Casidy at gate, both on sile now. 1026 200 prize exde complete ~ y gal each once sadin. Testa good 045 ing go, will be calle ating transduces not WW- & FLUTE liner in stalled and tested 1115 Clean up site, Secure equipment. Technicians + P.Bolan leave site. Site cleaned and secured. FLUTE crew 1200 and williams leave site. 2-23-2> Ka Continued from page Read and Understood By 7/lell/ Signed 2.23.22 Smn Date Sig 2/23/22 Signed

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Notebook No. D32 125 B 12 PROJECT WW- H- 948 FLUTE ENV. 0020 Continued from page _ -socret present. Weekber is church and Halvorsen + Tom 200 C001 Zohu win the proved and sampled using a FUMTR System. Samples will be called ded contract discharge hose. Proge pressure strat 225 psi and sand 2 at 203 pri. Bubbler Glow mater Let at 3 pri. and stuble at Desi Pressure Sample energy G 2 in use 15 mouther recourse butween Parameters Trans ducer mutur ID PU/COND = 91 P31=53.76 5: me = 22051207153 Temp: 24.61 = 7.19 -TV1B \$ 21 Pxy - 18.7 QUALE 124.01 5-10 = 9.13 Fem P COND = 1120 RD5 = 9.16 TUB 58.99 Lor = 200445 HPR -7.01-10.02 E10 + 5/12 Pufest = 7.01-10.02 SAMPIES (Ogalbus Purgad) Pre serve And 3:3 SAND16 Coste WIL Ander 584 0030) 22051207173 NONG I Se 3 1 (GB) 07183 WARD IN 025(1) n / M 1, 2- Droxa me 965 07193 · (FB) ١, OTROB ŧ ; ad se 0721B SUGE 0) IL Mondert ۲ ٩ 15 " (= B) \$) 07228 Paramiliers - 2205121016B = 8.58 PW Fame = 21.7 FILR TUB - 1.94 - 7.01.10.02 22Cm 10.01 - 50.0 - 10.01 SAMPLES (4 Gallons) **P**2 SAMPle Contrar 10 Ann'usis 22051210183 SRI NOMALL WIL ANDER 00700 T Ca " (Imp) 4. 5 -1055B 945 ٩. D250 ml Ander NIA 1056B 1,4 Droxane · (OHP) Continued from page N 1057B Read and Understood By 5.16.27 dr 5-16-22 5.16.22 A-13 ton

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ENJ. 110 BIM-32-543 Notebook No. 332# /25B 15 PROJECT PHASE Z FLUTE REPRESENT ATTUENLESS STUDY Continued from page AL MONTES & TONY TOREZ PRESENT. The WEATHER IS CLEAN + Hat. This Tonet will be punged & Sampled using The Flate sampling system. Samples collected From & dedicated TERION TUSE. PURSE PRESSURE & SAMPLE PRESSURE Buspien set @ 3psi + Trable @ 7.5psi. 15 mins of necouchy between cycles. 1.5 (ITENS DER PURGE PAR PARAMETERS METENTOS PH 8.53 91 off/world 25.12 2 TEMP T425 # ñ, 13 1571= 1108 Cones 3.6+ 21. 4 intes " Rdy = Turb 9,15 7.09/10.01(38.1.2) PAPAR 200445 " Los # = 7.051 10.03 TH POST 5/22 NExp = O SAllow SAmples 220516 1359B ANALysis SAMPLET PRESER 445 GNT LOTH 220576 1250B LINDMA (TB) 1)/ct Amben 100301 5nt 任 270516 140013 11 h 11 H17 - 14513 11 (FB) ١c 4 1 I. ł 1432B SUDASmus N/a 415 1403B "(FB) 1 k ų 11 11 145413 82700 1/ 11 ų 14053 " (F3) V 11 Ŋ lr. Ygallon Samples ANALISIS SAMPLE # LAS SAMPLER Cont PRESKAN 220517 13353 1) 107 Antes 220517 134013 LLNOMA Ter SNE 8.43 "Contonp) 134/13 12) ILTANDEN SAI h -H TEMP 2.59 12/00B 5000 / DIOXIN 5145 (1) 250m1 Ambin 4 Als 1077 11 14013 " (Dup) CONO I_1 11 7.08 AUTUS 11) IL+ Anben 14203 Turb 11 h 8770 pAprie 6.98/9.96(38.1) " (ALP) 1 14213 h 11 0Hpost 6.99/10.0 Continued from page 16 Read and Understood By 7.1) Junch G-24-22 A-16 5-23-22 for





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JE1-2-684 DRAFT ENU OILDA 20 Notebook No. DJ7# 175 (5) PROJECT <u>flute REPRESENTATIVE NESS</u> EVAL PLASE 2 Continued from page _ Tim TONE TONEZ pressent - The weigthen is quereast & cool ZONE WINGE punged & sampled using afrate system & samples placed From A ded corred TEFION HOSE. PURSE PRESSURE SET 245 & Sample CZYY Bubblen SET C Jps, & STABLE C 7,ps, 15 mines DETWEEN punges. * Chech UAIVE DOES N'T AOLD & WATER LEAVES THE TESING PANANCTENS OSAllon SAMPLES 270524 0725B SAMPLE# Anglysis PAESER CONT CAL -p4 7.87 220524 0630BL(~10mp(+13) 145 11)ICTAMben SLI 26.4 TEMP 07303 17 " (Dup) GOND 1171 As/cm 077IB 0.72 MTus Tuns SUDA SIM 1) 250m LAnbra 07320 A1< p4pne 705/ 615(130) 0733R "(Dap) Finalogeri 11 11 PHP05T7.07/10.15 0734R 1 8270 1 1LT Ambor μ 07353 11(Dup) ካ 11 4 sallow samples PARAMETERS SAMPLET ANALISIS nesew. Gautt (Ab 220524 132013 220521/1321R((M)DA 1) ILTANDEN SKE 8.28 " (Aup) рH 32215 10 11 h TEMP 265 (323B SUDA Sim 1) 250 m 1 Amber Als Gons 1183 "(Onp) 1 13503 11 Turb 0.88 4 1) ILTANSER 13513 10 \$270 pHpn= 7.01 9.94(576) "(Dup) 135213 2 1 04 post 7.05/ 9.94 METERIDS 572= 9,13 ATAS pH/coms # 91 Tur5#21 Roly 9.15 attus Exp 5/22 TUND LOT# 200445 Bsallow Samples PARAMETERS Sanple# Avialis. Preser 45 CONT 220525 13301 22052513313 ((NDMA (1) / (TAmber 100 SKI "(Dup) 813 ÞΗ 14003 11 Temp 27.6c 1 YOIB SUCA SIM: 4 (1) 250m/AMER Als Conco 1218 Astem "(Dup) 4 146213 1 0.78-14: 14233 8270 Tunb h (1) (ITAM bER 1 PHPAE 6.99/9.99(320) PHPOST 7.00 19.98 GAS BREAK IN'S EVERY CULLE-TO SET SAMPLED XX Continued from page Read and Understood By A-20 5-27-2022 winch 5-31-22 Or Signed

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132#175(5) Notebook No. _

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JEANZ-684 Draft ENV.0110A PROJECT Flute REPAESENT ATTON EVAL PHASE 2

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220521302 1302 130526	130/13 ECNIMA	LAS U)ILTAMOR	n SAt						
p4 8.15	1307B "(ms)	11 11							
TEmp 26.3 c	1320B "(Dup/ms)	1, 1,	4						
GOUD 1165	13213 Subasim	4 (1) 250m/A	Als Als						
Turb D. 414 attys	1322B "(Dup)	n n	11						
pt/pr/ 7-0/10-04/41.5	13230 8270	1.1 (1) (TAAB	m 1						
pHpost 7.01/10.03	134513 11(Dap)	<u> </u>							
	17 sallow SAmpling								
PARAMETERS SAM	elEFF Aninkysis	PHESENS GOVT	445						
22052710450 22052	71300 B LONDMA	100 1) LIT And	TEN SVIE						
p4 8 09	1301B "(Dgp)								
Temp'24.1	1302B SUDASIMS	11 (1) 250m/4	Als Als						
Concil=1110	1303 8 8270	4 DILTAN	55-7 4						
T416 0.52	1330 B "(Dap)	<u> </u>	4/						
pttpate Dol. 10.02									
pt+p5, * 7.00. 10 01									
		· · · · · · · · · · · · · · · · · · ·							
			Continued from page 20						
	Read and Understood By								
	5-22 A-21	Y_{n} , $ \land$	6 91 10						
Signed	Date	Signed	111 7-3 - 6 - 6 - 6 - 6 - 6 - 6 - 7 - - - 7 - - - - - - - - - -						

WW.5-909 22 Notebook No. 032#125 (B) PROJECT FLUTE REPRESENTATIVENESS EJAL PHASE 2 Continued from page Tim Kondy & Tory Torrez presert, The wenther is class & working This Bare Will be punged & Sampled. Delicated Terloy discharge TASE used for sampling Punse Pressure 224ps, + Sample Pressure 203. 15 mins Recovery between PURSES. - WATER WAS AddEd TO INSIDE OF FILTE SINCE BUSSIEN INITIAL PRESSURE WAS 2. 5ps, AFTER Adding WATER BUBBLER SET @ 3 5 STAGLE psi. Canboy 6.1 @5 ØSAllow SAmple Panamerens Anterly Presen 5Ample# Gart 44 220532 08558 22053206308 (CNOMA (TS) 1) 1 it mber 1E 515 eH 781 0900B p4 TEMP 26.1 090/13 "(F3) 1475 and 09023 Supasms 1)250m/ mbs Als TUND 8.40 090373 "(FB) PHPRE 7.01/10.01 (761)-090973 (1) 1 CTANGEN 8270 pH post 7.01/10-03 " (FB) 090575 4 sallow Samples PARAME Ens Sample# LESEN ANA 4515 Cont LAL 220531 1300B 220531 13013 (CN SMA 1) 1 tranken SAL pH 7.78 13303 "(Dup) 4 11 LTEMP 25.4% 13313 500ASIMS 11)25 un / parlan h H (S 146TAS/CM Govs 13328 (1(Dup) 1 11 11 6270 Junb Ge. 54 13335 1) KTANYER 1/ .5 \$HPAG 6.98/10.05/223 13343 " (Dup) 11 Ŋ 11 PHPOST 7.02/10.05 METER IN'S PH/ coul 91 Tunb#21 srd = 9.42 Rels= 9.45 Emp 6/22 45T# 200445 Continued from page Read and Understood By To 6.6.82 A-22 pr unde 6-7-22

ROJECT WW-5-909

7.81

COUD 1855 hs/cm

pHpn= 7.00/10.07/38.0

TEmp 25.9'c

Turb 4.67

hroneters

3

PHPD5- 7.01/10.00

me = 22062/250B

17.84

Panamereas 220601 12503

pH

8 SAILON SAMPLE SAMOLOT ANALysis CAL PRESER CONT. 2201001125513 ((NOMA SAT læ 1)/LTAMben 11 Dup) 125613 4 /1 11 5009 Sims 125713 1)250m/Ambén Als 4 12583 11 (Dup) 4 1259B 827 (1)/LTambon h 1 Jan Halvarsen, mott Garcia a T. n Kondy Present (6.2.2022) 13 agillon Samples Pre serve SAMPLE Conta: nor LAB Anals:-Bacheriasza 5R 2 Nows a (1)1L amber IG "(ms) 1253B ۱, 1, ..

1.25 gras. 6 (ms Die) 1254B FILIPL ond 13203 ł (DREOM) ANDER N/S 4. Dio van Q - 41.99 1321B ۱. " (Dup) 4 くる ** Re -7.00-13.01 (21.4) 1348 B (1) IL amber Suce 8270 D . "Ond West - 6.99-13.01 1349B

17 sallows Sample PRESER PARAMETERS ANALISIS 67# SAMPLET LAL In that 1) ICTAMBER Time 220606 13153 220606 13168 LINOMA 51pu 7.87 13178 " (Dup) 11 12 ト 24.02 () 25 m Ansen TENP 1318B 50045im Als Cono 1430 holom (1) ILTAM SEA 13193 8270 l 4 Tuns 296 " (Dup) 1320B 11 4 pHpae 7.2119.96 (40.8) pHpost 7.28/9.95

Continued from page 22

T. 3

Read and Understood By 6.6-22A-23 Jon U unche 6-7-22

23