

# Characterizing PFAS IDW from Investigative Soil and Groundwater Data

Jeff Ramey, Principal Chemist Ken Quinn (PG), Marshal Tofte

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# RockGen Energy Center Facility and Site Description

## **Site Description**

> 77.81 acres over two parcels located in the Town of Christiana/ Cambridge, WI in SW Dane County

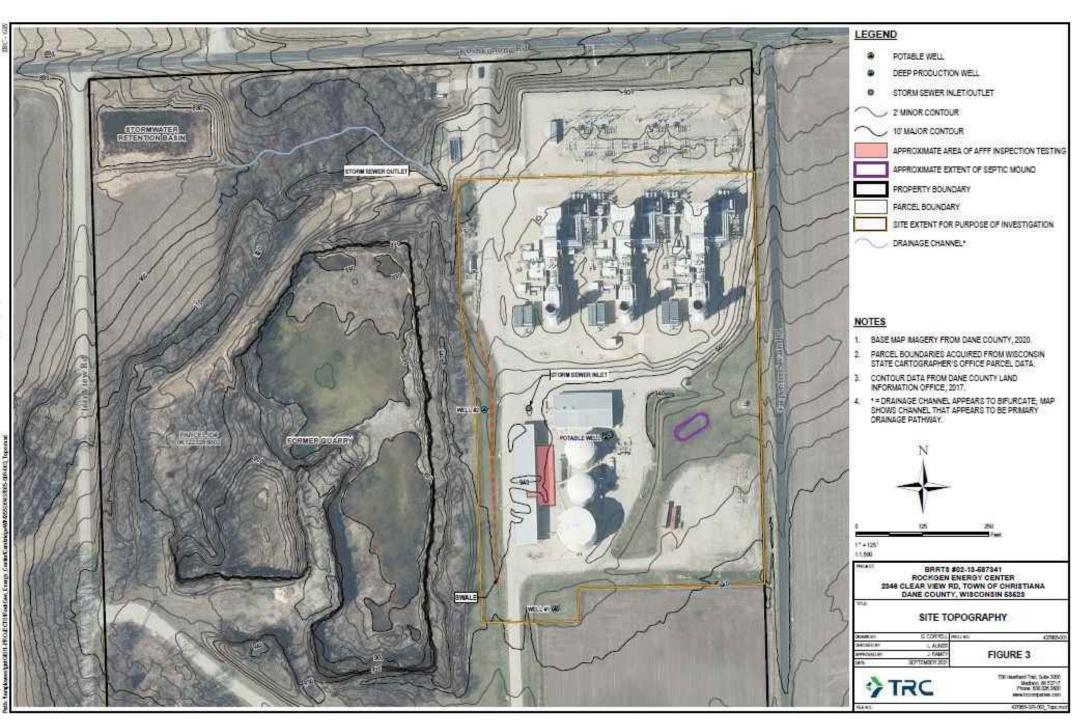
## **Site History**

- ➤ 1910 Agricultural land including dairy farm on southeast portion of the property
- ➤ 1945 Limestone quarry operated by T&T Stone Co. until 1960s
- ➤ 2000 Construction of generation facility (facility ownership changes multiple times)

## **Facility Description**

➤ Natural gas and fuel oil generation with three combustion turbines and generators, three above ground storage tanks, and support structures on 10 acres of the Site







Site Topography and Layout



# **Site Geology**





# NR 700 Steps Completed/ In Progress

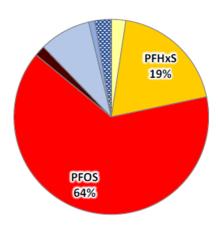
- ➤ March 2021 NR 706 Hazardous Substances Discharge Notification
- ➤ April 2021 NR 716 SIWP w/ Interim Action Options (approved within 1 week)
- ➢ Apr. 2021 Jul. 2021 NR 716 SI (initial) 7 MWs (70'), 1 PZ (300'), 25 SBs
- ➤ July 2021 NR 708 Interim Action Workplan (approved within 1 week)
- ➤ August 2021 NR 716 Supplemental SIWP (approved within 1 week)
- ➤ September 2021 NR 716 SIR (approved April 2022)
- Oct. 2021 Dec. 2021 NR 716 SI (phase 2) 5 MPs (300')
- ➤ Apr. 2022 Jun. 2022 NR 708 Interim Action Construction
- ➤ October 2022 NR 708 Remedial Action Documentation Report (approved January 2023)
- ➤ December 2022 NR 716 Technical Assistance Meeting CSM/3D Model (memo. January 2023)
- ➤ March 2023 NR 716 Supplemental SIWP Addendum (review requested within 2 weeks)
- ▶ April 2023 May 2023 NR 716 SI (phase 3) 1 MW (70'), 3 MPs (250'), 8 SBs

# **Aqueous Film Forming Foam (AFFF)**



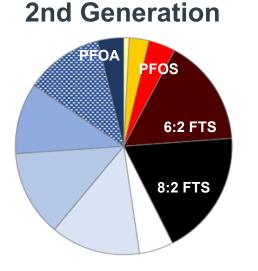


## **PFOS Based AFFF**

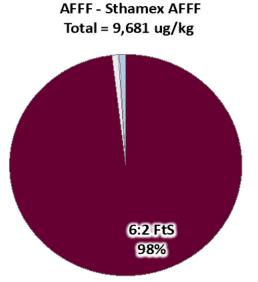


# 1<sup>st</sup> Generation

 Note: Typical composition is mainly PFOS and PFHxS



8:2 and 6:2 FTS Based Foam



Modern Fluorotelomer

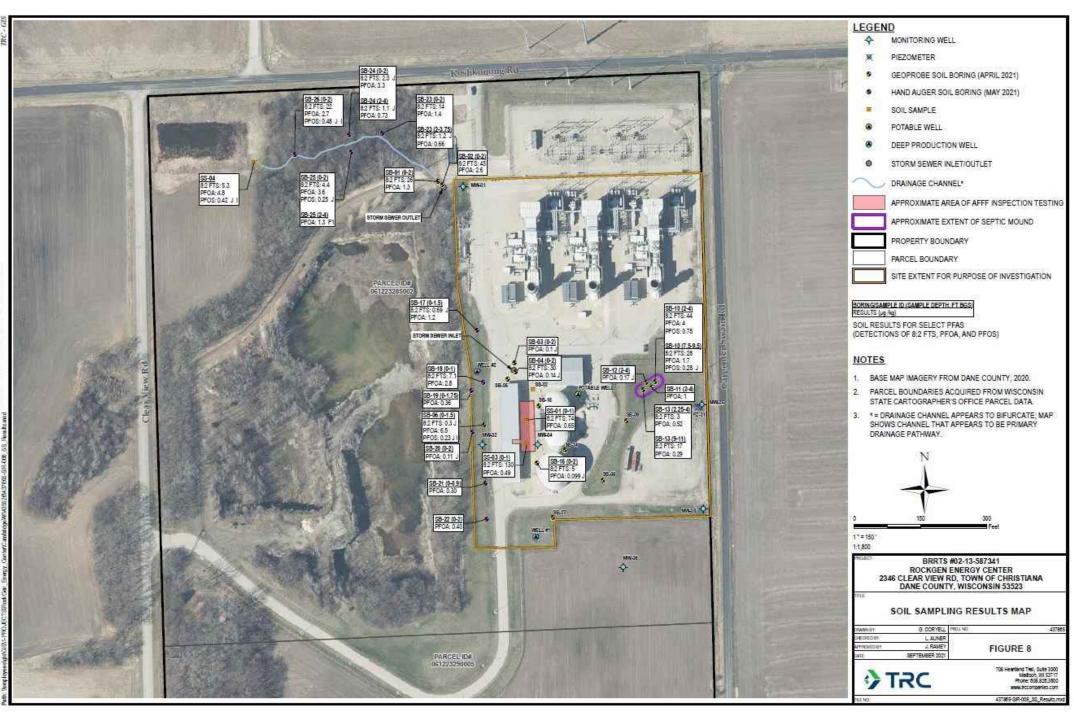
#### Data sources

<sup>.</sup> Swedish Chemicals Agncy, 2015. Chemical Analysis of Selected Fire-fighting Foams on the Swedish Market 2014.



# Forensic Signature

Ansulite 3% AFFF AFC-3A





# Soil Investigation

# **Treatment/ Pretreatment Considerations – Onsite or Offsite?**



## Onsite

- Permitting
  - > Timeline (3-9 months)
  - Regulatory limits?
- Discharge Point
  - Surface water available
    - ➤ Public relations/ perception issue?
  - ➤ No POTW available
- ➤ Technology(ies)
  - > GAC, IX Resin, both
- Benefits
  - Cost savings for large volumes
  - Green(ish) reduced carbon emissions vs. T&D

## Offsite

- Indemnification
  - Permitted facility specifically for waste stream
- ➤ Location and Carbon Footprint
- ➤ Capacity/ Availability
- Waste Approval
- Technology
  - Incineration
  - > Treatment train
- Benefits
  - Indemnification
  - Cost savings for small volumes
  - > Timeline
  - Certainty for previous owner





- ➤ (88+) 55-gallon drums of cuttings
- ➤ (9) 1,500-gallon polytanks for drilling returns
- > (1) 20,000-gallon frac tank with 3 sumps for drilling returns
- ➤ Over 50,000 gallons of drilling returns treated in permitted facility
- Solid materials disposed of in Subtitle C facility (establishes manifest)









# **Future Excavation**

# ➤ 1,000 tons disposed of in Subtitle C





















Call Us:

**Jeff Ramey** 414.294.9247

# Thanks!



**Email Us:** 

<u>jramey@TRCcompanies.com</u>



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