Remediation of AFFF/ PFAS Impacted Soil by Sequestration and Natural Attenuation

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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 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) ➢ 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) ➢ Apr. 2022 – Jun. 2022 – NR 708 Interim Action Construction October 2022 – NR 708 Remedial Action Documentation Report (approved January 2023) \geq 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)



Forensic Signature

Ansulite 3% AFFF AFC-3A



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Soil Investigation



Potable Well Abandonment

- Existing well drilled to 200' bsg. impacted
- Abandonment eliminates downward groundwater gradient from pumping
- Two production wells drilled to 1,000' bgs not impacted
- HDD to minimize waste generation (~400')
- Southern industrial well selected for potable





Impacted Infrastructure: Clean or Replace?

- Impacted systems may include:
 - Fire suppression systems (concentrate storage tank, piping, nozzles) Fully replaced
 - Fire trucks and response vehicles Not applicable
 - Septic tanks Fully replaced
 - Process equipment Not applicable





Excavation

- > TRC self-performed excavation of septic system and mound.
- > 1,000 tons disposed of in Subtitle C landfill (Wayne Disposal)







Capping - Asphalt

Site grading and prep – no removal and disposal of soil

≻5" asphalt cap

Geosynthetic cover beneath piping and facility infrastructure

Drainage enhanced





Capping – Geosynthetic Cover System

- Subgrade preparation no removal and disposal of soil
- Non-woven geotextile cushion
- ≻40-mil LLDPE
- Engineered synthetic turf
- Hydrobinder infill











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MNA Approach

Enhanced attenuation to manage PFAS plumes in groundwater – 2021, Newell, et. al.

- 1. Injection of particulate sorbents to enhance retention
- 2. Capping to retain PFAS in the vadose zone
- 3. Gas sparging in aquifers to concentrate, retain PFAS
- 4. Retention via PFAS salting out processes
- 5. Emplacement of particulate sorbents with geotech equipment
- 6. Intentional LNAPL barrier emplacement to retain PFAS
- 7. Inject emulsified veg. oil (EVO) to enhance chemical retention
- 8. Capture PFAS in groundwater discharging to surface water

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Soil Natural Attenuation

Source sequestration achieved through interim action remedies to allow soil natural attenuation









Thanks!



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