

**TOOELE ARMY DEPOT – SOUTH AREA
(TEAD-S)**

**MODULE VI
ATTACHMENT 6**

**SOLID WASTE MANAGEMENT UNIT (SWMU) 13
POST CLOSURE PLAN**

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LIST OF ACRONYMS AND ABBREVIATIONS

| | |
|-------|--|
| ABP | Agent Breakdown Product |
| CAMDS | Chemical Agent Munitions Disposal System |
| CFR | Code of Federal Regulations |
| CMI | Corrective Measures Implementation |
| CMS | Corrective Measures Study |
| DWMRC | Division of Waste management and Radiation Control |
| EO | Environmental Office |
| LNAPL | Light Non-aqueous Phase Liquid |
| LTM | Long Term Monitoring |
| OM&M | Operations Monitoring and Maintenance |
| PCP | Post Closure Plan |
| RCRA | Resource Conservation and Recovery Act |
| RFI | RCRA Facility Investigation |
| SVOC | Semi-volatile Organic Compounds |
| SWMU | Solid Waste Management Unit |
| TDS | Total Dissolved Solids |
| TEAD | Tooele Army Depot |
| UAC | Utah Administrative Code |
| VOC | Volatile Organic Compounds |

1.0 INTRODUCTION

The four objectives of this Post-Closure Plan (PCP) are: 1) ensure that Tooele Army Depot South Area (TEAD-S) complies with the Permit; 2) outline the requirements needed to prevent exposure or contact with contamination left in place at this Solid Waste Management Unit (SWMU); 3) to ensure industrial use only; and 4) to ensure any buildings are constructed to prevent exposure via the vapor intrusion pathway. To meet these objectives, this PCP provides detailed information regarding the location, regulatory criteria, and post-closure inspections at SWMU 13. Post-closure requirements will continue for a minimum of 30 years. The post-closure care period may be extended or shortened, as deemed necessary.

In accordance with Utah Administrative Code (UAC) R315-270-28, the PCP is required to include specific information for a closed facility. As applicable to SWMU 13, the information requirements include:

- General description of the facility,
- Description of security procedures,
- General inspection schedule,
- Preparedness and Prevention Plan,
- Facility location information (including seismic and flood plain considerations),
- Closure Plan or Closure Proposal,
- Certificate of Closure,
- Topographic map, with specific scale,
- Summary of groundwater monitoring data, and
- Identification of uppermost aquifer and interconnected aquifers.

The following table lists the regulatory citation, description of the regulatory requirement and where to find this information in the permit and within this PCP.

Table 1: Summary of SWMU 13 Post-Closure Information Requirements Under UAC R315-270-14

| Regulation Citation | Requirement Description | Requirement Location |
|---------------------------------|--|------------------------------------|
| UAC R315-270-14(b)(1) | General Description of the Facility | Section 2 and Permit Attachment 6 |
| UAC R315-270-14(b)(4) | Description of Security Procedures | Section 2.8 and Module VI (VI.I) |
| UAC R315-270-14(b)(5) | General Inspection Schedule | Section 3.2 and Module VI Form A |
| UAC R315-270-14(b)(12) | Training Requirements | Section 2.8 and Module VI (VI.K) |
| UAC R315-270-14(b)(6) | Preparedness and Prevention | Permit Attachment 10 |
| UAC R315-270-14(b)(11)(i-ii, v) | Facility Location Information Applicable seismic standard | Permit Attachment 6 (Section 14.4) |

| Regulation Citation | Requirement Description | Requirement Location |
|-------------------------------|--|---|
| UAC R315-270-14(b)(11)(iii-v) | Facility Location Information - 100-year floodplain | Permit Attachment 6 (Section 14.5) |
| UAC R315-270-14(b)(14) | Closure Certification and Notification | Section 2.7 |
| UAC R315-270-14(b)(16) | Post-Closure Cost Estimate | Federal Facilities are exempt from this requirement |
| UAC R315-270-14(b)(18) | Proof of Financial Coverage | Federal Facilities are exempt from this requirement |
| UAC R315-270-14(b)(19)(i) | Topographic Map - Map Scale and Date | Permit Attachment 6 (Section 9.0) |
| UAC R315-270-14(b)(19)(ii) | Topographic Map - 100-year floodplain area | Permit Attachment 6 (Section 14.5) |
| UAC R315-270-14(b)(19)(iii) | Topographic Map - Surface waters including intermittent streams | Permit Attachment 6 (Section 10.0) |
| UAC R315-270-14(b)(19)(iv) | Topographic Map - Surrounding land uses | Permit Attachment 6 (Section 11.0) |
| UAC R315-270-14(b)(19)(v) | Topographic Map - A wind rose (i.e., prevailing windspeed and direction) | Permit Attachment 6 (Section 12.0) |
| UAC R315-270-14(b)(19)(vi) | Topographic Map - Orientation of map, North arrow | Permit Attachment 6 (Section 9.0) |
| UAC R315-270-14(b)(19)(vii) | Topographic Map - Legal boundaries of the hazardous waste management facility. | Permit Attachment 6 (Section 9.0) |
| UAC R315-270-14(b)(19)(viii) | Topographic Map - Access control, fence, gates | Permit Attachment 6 (Section 9.0) |
| UAC R315-270-14(b)(19)(ix) | Topographic Map - Injection and withdrawal wells | Permit Attachment 6 (Section 11.1) |
| UAC R315-270-14(b)(19)(xi) | Topographic Map - Barriers for drainage or flood control | Permit Attachment 6 (Sections 9.0 and 14.0) |
| UAC R315-270-14(c)(1) | Groundwater Monitoring Information - Summary of groundwater data | Final OM&M Report (Plexus, 2019) |
| UAC R315-270-14(c)(2) | Groundwater Monitoring Information - Identification of uppermost aquifer | Final OM&M Report (Plexus, 2019) |
| UAC R315-270-14(c)(3) | Groundwater Monitoring Information - Delineation of the waste management area | Final OM&M Report (Plexus, 2019) |
| UAC R315-270-14(c)(4) | Groundwater Monitoring Information - Extent of plume | Final OM&M Report (Plexus, 2019) |

| Regulation Citation | Requirement Description | Requirement Location |
|----------------------------|---|---|
| UAC R315-270-14(c)(5) | Groundwater Monitoring Information - Detailed plans/engineering report for proposed groundwater program | Post closure groundwater monitoring will be in accordance with the TEAD-S Groundwater Management Plan |
| UAC R315-270-14(c)(6)(i) | Groundwater Monitoring Information - Proposed list of parameters | Post closure groundwater monitoring will be in accordance with the TEAD-S Groundwater Management Plan |
| UAC R315-270-14(c)(6)(ii) | Groundwater Monitoring Information - Proposed groundwater monitoring system | Post closure groundwater monitoring will be in accordance with the TEAD-S Groundwater Management Plan |
| UAC R315-270-14(c)(6)(iii) | Groundwater Monitoring Information - Background values | Post closure groundwater monitoring will be in accordance with the TEAD-S Groundwater Management Plan |
| UAC R315-270-14(c)(6)(iv) | Groundwater Monitoring Information - A description of the proposed sampling | Post closure groundwater monitoring will be in accordance with the TEAD-S Groundwater Management Plan |

2.0 FACILITY DESCRIPTION

The following provides a general description of SWMU 13, as required by UAC R315-270-14(b)(1).

2.1 SWMU 13 LOCATION AND HISTORY

SWMU 13 is located within the southwestern quadrant of TEAD-S. It includes the former Chemical Agent Munitions Disposal System (CAMDS) within a ten-acre fenced area. The CAMDS facility operated from 1979 to 2005 to develop and demonstrate methods for chemical munitions handling, demilitarizing chemical munitions, waste incineration, and treating wastes from the demilitarization process. When operational, CAMDS consisted of incinerators, munitions handling areas, waste handling areas, chemical storage areas, hazardous waste storage areas, laboratories, control rooms, maintenance facilities, and support buildings (Rust 1997, URS 2002, Parsons 2013a).

Upon completion of the CAMDS mission in 2005, operations ceased, the facility was decommissioned and all facilities were demolished. The closure of CAMDS has been approved by the Utah DWMRC with respect to past chemical releases (URS 2012), with the exception of the remnants of a historical fuel spill and minor releases of chlorinated solvents. The historic fuel spill was the result of a leak in an underground diesel fuel line that occurred sometime between 1980 and 1985 in the vicinity of three aboveground storage tanks (ASTs) near the western perimeter of CAMDS. The leak went undetected for an unknown period of time and up to 38,000 gallons of fuel may have been released (Rust 1997). As part

of the closure verification, URS (2012) collected soil and sump-water samples that were analyzed for metals, explosives, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), chemical agents, and agent breakdown products (ABPs) based on the history of individual facilities and their potential for contamination.

2.2 PAST OPERATIONS

SWMU 13 is characterized by former building cement pads and unpaved soil covered with sparse vegetation, including grasses, weeds, and rabbit brush. It is relatively flat but slopes very gradually from the northeast to the southwest. The site is a result of a long-term fuel oil leak from below ground storage tanks, which have been removed.

2.3 PREVIOUS INVESTIGATIONS DOCUMENTATION

Several investigations and corrective measure studies of SWMU 13 have occurred over the past several years to include:

- Installation Assessment (USATHAMA 1979),
- Exploratory Survey (ErTech, 1992),
- Installation Environmental Assessment (Ebasco, 1993),
- Preliminary Assessment/Site Investigation (EA, 1988),
- Resource Conservation and Recovery Act (RCRA) Phase I RCRA Facility Investigation (RFI) (Donohue and Associates, 1990),
- Remedial Investigation Report (Weston, 1991),
- RCRA Phase II RFI (Rust, 1997),
- Decision Document (URS, 2001),
- Corrective Measure Study (URS/Dames and Moore, 2002),
- Product Thickness Monitoring (SC Environmental, 2009),
- CAMDS Closure Verification Sampling Report (URS, 2012),
- Base-wide groundwater monitoring (Klienfelder 1999 and 2006 and Jacobs, 2011),
- RCRA Data Gap Investigation (Parsons 2014),
- Corrective Measure Study (CMS) and Decision Document (Parsons, 2016),
- Corrective Measure Implementation (CMI) Plan (Plexus, 2017), and
- Operation, Maintenance and Monitoring (OM&M) Plan (Plexus, 2018).

The implemented corrective measure remedy at SWMU 13 consists of the following:

- Installation of extraction trenches to recover light non-aqueous phase liquid (LNAPL),
- Monitoring of petroleum constituents in groundwater and soil gas,
- Groundwater use restrictions,
- Excavation restrictions,
- Land use restrictions, and
- Long-term monitoring.

The system consists of three LNAPL recovery trenches, 14 sumps, eight skimmer pumps, and eight 55-gallon drum recovery systems and was installed in 2017/2018 in accordance with the CMS Implementation Work Plan (Plexus, 2017). A product recovery system prove-out and a baseline OM&M evaluation were also completed in 2018.

2.4 CLOSURE ACTIVITIES

Due to technical inefficiency of the implemented system, TEAD-S requested a Technical Impracticality (TI) variance, proposing a shutdown of the existing system and an alternative remediation strategy consisting of long-term monitoring (LTM) and land use controls. LTM will consist of horizontal and vertical plume monitoring and updating the potentiometric surface maps. The TI variance was approved by the State (TEAD, 2019)

2.5 HUMAN HEALTH AND ECOLOGICAL RISK ASSESSMENT

The protection of human health and the environment will be ensured by site-specific measures outlined below, rather than by achieving the Utah criteria for groundwater or soil vapor. In addition, to ensure protection of human health and the environment, the following land use controls are required:

- Industrial use only.
- Limitation on buildings. The RFI concluded that the vapor intrusion pathway was complete and that it was assumed a priori that adverse risks were present from the vapor intrusion pathway. Any construction of buildings near the footprint of SWMU 13 and near the groundwater plume associated with SWMU 13 will require adequately ventilation for VOCs and periodic testing.
- Dig permit process. Intrusive activities should be limited to near ground surface, to prevent contact with any LNAPL present in shallow groundwater.

2.6 SURFACE WATER AND GROUNDWATER

Groundwater at TEAD-S is part of the regional flow system within Rush Valley. The groundwater underlying TEAD-S is recharged by intermittent streams and subsurface flow coming from the Oquirrh Mountains northeast of the facility. Groundwater flow at TEAD-S is influenced by the presence of a notable groundwater divide that crosses the facility from the northeast to the southwest.

North of this divide, groundwater flow is generally to the west toward discharge points near the center of Rush Valley. South of the divide, groundwater is directed southeastward toward Cedar Valley. Shallow groundwater at TEAD-S generally occurs under unconfined conditions, although semi-confined and confined conditions exist in localized areas. Depth to groundwater beneath TEAD-S ranges from greater than 200 feet bgs at sites closer to the recharge areas in the northeast, to less than 10 feet bgs near discharge areas located along the TEAD-S western boundary (Parsons, 2017).

SWMU 13 lies on the south side of the regional groundwater divide and groundwater flows to the south-southeast. The horizontal groundwater gradient across SWMU 13 is measured by comparison of groundwater elevations in shallow wells across the site. Historically, from just outside the upgradient area where the diesel product is present at monitoring well S-26-88 to the downgradient south side at monitoring well S-30-88 there is an elevation difference of 1.3 feet across a distance of 650 feet. This equates to a slight horizontal gradient of 0.001 feet per foot or about five feet per mile. The slight horizontal gradient is further confirmed by the site-wide potentiometric surface map presented in the Final Hydrological Assessment and Recommendations Report, which shows a groundwater high and large, flat area beneath SWMU 13 (Parsons, 2017).

Shallow groundwater conditions were further investigated beneath SWMU 13 with the drilling, installation and sampling of monitoring well S13-CAM-DW1. The well is sited at the former location of

the diesel fuel storage tanks that leaked and released the diesel fuel and is paired with S-CAM-2, where residual diesel fuel remains as an LNAPL on top of the water table. The location was selected to be representative of the area where impacts from the diesel fuel are the greatest.

An evaluation of the boring log and the CPT data for S13-CAM-DW1 finds fine-grained soils that are a mixture of clays, silts and fine sands to a depth of 54.8-feet bgs, where a silty gravel was encountered. This coarser layer was found to be about two-feet in thickness and was the interval selected to be screened. According to Freeze and Cherry (1979) horizontal hydraulic conductivity in the type of soil between the shallow groundwater and the coarser layer is low and typically ranges from 1×10^{-4} to 1×10^{-5} cm/sec. Additionally, Freeze and Cherry also state that in layered sediments, the vertical hydraulic conductivity can be up to 10-times less than the horizontal value.

The horizontal groundwater gradient across SWMU 13 is measured by comparison of groundwater elevations in shallow wells across the site. From just outside of upgradient area of where the diesel LNAPL is present at monitoring well S-25-88 to the South side at monitoring well S-30-88 there is an elevation difference of 0.5 feet across a distance of 550 feet. This equates to a slight horizontal gradient of .001 feet per foot or about 5 feet per mile. The lack of a significant horizontal gradient across SWMU 13 is confirmed by the site-wide potentiometric surface map presented in the Final Hydrological Assessment and Recommendations Report (Figure 2.6, Parsons, 2013), that shows a groundwater high and large flat area beneath SWMU 13.

The vertical gradient beneath SWMU 13 is measured as the difference in groundwater elevation heads between paired wells S-CAM-2 and S13-CAM-DW1. Prior to determining the vertical gradient, the water level for S-CAM-2 was corrected to account for the different densities of the groundwater and free product layer. The water level was corrected as described in Appendix I of the Parsons (2014) “*SWMU 13 CMS Data Gap Work Plan and SWMU 30 Phase II RFI Addendum Work Plan*,” and Exhibits III.9 and III.10 of the USEPA (1996) guidance document “*How to Effectively Recover Free Product at Leaking Underground Storage Tank Sites*.” Output details from the vertical gradient calculator (USERA 2016), show a slight downward gradient of 0.008 feet per foot was calculated. The vertical gradient was re-evaluated using the 2018 data (Plexus, 2019). A downward vertical gradient of less than 0.01 was calculated for the selected shallow/deep well pair by the USEPA vertical gradient calculator. Although a downward, vertical gradient is present, the 40-foot clay layer restricts most of the flow to the higher K units in the deeper zone.

As a general indicator of groundwater quality, total dissolved solids (TDS) was measured in samples from the paired wells. TDS in the shallow well is approximately 2,800 mg/L while approximately 17,000 mg/L was found in the deeper well. This difference suggests groundwater quality decreases with depth beneath SWMU 13. This difference further indicates a lack of vertical groundwater communication or movement between the intervals screened by these two wells.

The combination of fine-grained soils with low hydraulic conductivity and the lack of both horizontal and vertical gradients to produce a driving force combine to minimize potential groundwater movement beneath SWMU 13. A lack of vertical groundwater movement is confirmed by the change in groundwater quality between the screened intervals in the paired wells. Trace concentrations of several chemical constituents detected in Monitoring well S13-CAM-DW1 are believed present as a result of more than 30-years of chemical dispersion beneath the area where the diesel fuel was spilled, rather than a result of groundwater movement. The minimal change in groundwater elevations indicate little recharge is occurring to the groundwater underlying the installation and that there is not much connection with the ground surface or other groundwater recharge sources. For SWMU 13, hydrographs (Parsons, 2013)

generated using data from 1999 through 2012 demonstrate the minimal variation of groundwater levels with differences due to seasonal fluctuations.

2.7 CLOSURE NOTIFICATIONS

Federal facilities are exempt from submitting notifications to the local zoning authority in accordance with UAC R315-264-110 through 120.

2.8 SECURITY REQUIREMENTS

The Permittee shall comply with the following security conditions as applicable to SWMU 13:

1. SWMU 13 is located within a Federal, military installation (TEAD-S). As such, the installation is restricted for the common population.
2. Access to SWMU 13 will be restricted and approved by the TEAD-S EO.
3. Signs will be placed and maintained at all entry points. Signs will identify the SWMU and provide contact information and state that entrance into or disturbance with the SWMU are prohibited without installation (EO) approval.
4. All signage and any fences shall be inspected throughout the post-closure care period. Inspection of security measures shall be included in the annual site inspections (Form A, Module VI).

Damaged security equipment (e.g., signs, fencing, well bollards, etc.) shall be noted in the inspection checklists (Form A, Module VI). Repairs shall be completed as soon as practical after the problem is discovered, in compliance with UAC R315-264-15(c).

3.0 POST-CLOSURE OPERATIONS AND INSPECTIONS

3.1 INTRODUCTION

SWMU 13 post closure care is in accordance with the TEAD-S RCRA part B Permit. To ensure that the area is not reused or developed for residential purposes, periodic site inspections and a biennial post-closure report shall be required. Removal and reuse of soil from this site will not be allowed unless under an excavation permit approved by the TEAD-S Environmental Office (EO); removal and reuse of the soil associated with the soil pile removal is prohibited unless part of the remediation process. Soil disturbance at this site must be coordinated through the TEAD-S EO.

3.2 ROUTINE SITE INSPECTIONS

During the Post-Closure period, general inspections of the SWMU 13 site shall be conducted annually by November 1st to ensure the site remains under industrial use and to ensure that the TEAD-S Excavation Permit process has been followed. Any modifications to the frequency of inspections will be in accordance with amendments submitted in the form of proposed permit modifications.

Site inspections will consist of a complete walkthrough and visual inspection of the areas. A general site inspection checklist for industrial sites is included in Module VI as Form A. Completed inspection forms

shall be filed with the TEAD-S EO. At a minimum, the site shall be visually inspected to ensure the following conditions are maintained at the site:

1. There is no evidence of land use other than for industrial purposes within the former site boundary; and
2. There is no evidence of soil disturbance.

At a minimum, the site inspector should have a radio or phone and a First Aid kit available during inspections.

3.3 INSPECTION FOLLOW-UP

Copies of completed site inspection checklists (Form A of Module VI) shall be forwarded to the TEAD-S EO. The EO shall notify the appropriate personnel to implement corrective action as needed. Corrective action shall be initiated as soon as practical after identifying a problem, or as directed by TEAD-S. If the corrective action requires substantial effort, a technical plan shall be prepared to summarize the problem, the potential impacts, the proposed plan for action, and the time-frame in which corrective action will be implemented as required under this Permit. This plan shall be approved by the Director prior to implementing corrective action.

3.4 NON-COMPLIANCE REPORTING

Notifications of any type of non-compliance with any condition of this Permit shall be submitted as required by Condition V.L.4.

3.5 BIENNIAL POST-CLOSURE REPORT

In accordance with UAC R315-270-30(1)(9), a Biennial Post-Closure Report shall be prepared for all SWMUs undergoing post-closure care by March 1 of the reporting year. The SWMU 13 Biennial Post-Closure Report shall include, at a minimum, the following:

- General site description and conditions, and
- Inspection records.

3.6 REQUIRED SUBMITTALS

Biennial Post-Closure Report Post-Closure Reports shall be submitted to the Director no later than March, of the year the report is due. Reporting years are even numbered years beginning with March 2020, for the duration of the Post-Closure Monitoring Period.

3.6.1 *Non-Compliance Reporting:*

- The Permittee shall notify the Director orally within 24-hours of any noncompliance that may endanger public drinking water supplies or human health or the environment.
- The Permittee shall notify the Director in writing within five days of any non-compliance which may endanger public drinking water supplies or human health or the environment including evidence of groundwater contamination, significant data quality issues.

- The Permittee shall notify the Director in writing within 15-days of any noncompliance which does not endanger public drinking water supplies or human health or the environment.

3.6.2 *Anticipated Non-Compliance:*

- 30 days' advance notice of any change which may result in noncompliance

4.0 POST-CLOSURE CERTIFICATION

No later than 60 days after post-closure activities are completed and approved by the Director, the Permittee shall submit a certification to the Director, signed by the Permittee and an independent professional engineer registered in the State of Utah, stating why post-closure care is no longer needed.

5.0 REFERENCES

State of Connecticut Department of Energy and Environmental Protection (CT DEEP), 2014. *Draft Guidance for Applying Technical Impracticability of Groundwater Remediation Variance Pursuant to the Remediation Standard Regulations.*

https://www.ct.gov/deep/lib/deep/site_clean_up/remediation_regulations/ti_guidancedraft_2-20-14.pdf

Deseret Chemical Depot (DCD), 2009. *Revised Integrated Natural Resources Management Plan for Deseret Chemical Depot.*

Division of Waste Management and Radiation Control (DWMRC), 2019. *Administrative Rules for Cleanup Action and Risk-Based Closure Standards.* Utah Department of Environmental Quality. R315-101, Utah Administrative Code.

Freeze, R.A., and J.A. Cherry, 1979. *Groundwater.* New Jersey: Prentice Hall Inc. Englewood Cliffs, 604 p.

Parsons, 2013. *Final Hydrogeological Assessment and Recommendations Report.* July.

Parsons, 2016. Solid Waste Management Unit 13 Corrective Measures Study Work Plan, Report and Statement of Basis, Tooele Army Depot South Area. July.

Parsons, 2017a. Corrective Measures Implementation Plan for Solid Waste Management Unit 13, Tooele Army Depot South Area. March.

Parsons, 2017b. Final Groundwater Management Plan, Tooele Army Depot South Area. November.

Parsons, 2018. Corrective Measures Implementation Report for Solid Waste Management Unit 13, Tooele Army Depot South Area. May.

Plexus Scientific (Plexus), 2019. Final Operation, Maintenance, and Monitoring Report (OM&M) for Solid Waste Management Unit 13, Tooele Army Depot South Area. May

Tooele Army Depot (TEAD), 2019. Request for an Alternative Remedy Strategy at Solid Waste Management Unit 13 Tooele Army Depot South Area. June