

APPENDIX M

Non-Conformance Reports



**Appendix M
 Non-Conformance Report
 U.S. Army Environmental Command
 Per- and Polyfluoroalkyl Substances Preliminary Assessment/Site Inspection
 Aberdeen Proving Ground, Maryland**

Installation Name:	Aberdeen Proving Ground, Maryland	Event Date:	03 March 2021
Contract No:	W912DR-18-D-0004	Prepared By:	Matthew Blower
Project/Task No:	30001992.3BX50	Applicable Document:	Quality Assurance Project Plan Addendum: Worksheet #18 and associated figure(s)
Field Change Report No:	NCR-APG-01		

1. Description

Two grab groundwater samples and one subsurface soil sample were planned for collection at the Fords Farm range located within the Poverty Island range at Aberdeen Proving Ground (APG). All proposed samples at this location were removed from the site inspection (SI) scope of work following Health and Safety concerns at the site.

- Minor Change
- Major Change
- Major Project Impact

2. Reason for Change

During schedule coordinating with Aberdeen Test Center (ATC), a tenant agency in charge of testing at the Fords Farm range, expressed concern over sampling activities at the location due to existing radiation concerns at the site. After discussions with ATC staff, it was determined that subsurface intrusive activities at the site could potentially expose staff and equipment to radiation. All planned activities at the site were removed from the APG SI scope of work.

3. Impact on Present and Completed Work

The removal of the proposed sampling points from the scope of work impacts the ability to determine presence/absence of per- and polyfluoroalkyl substances (PFAS) at the Fords Farm area of potential interest (AOPI). The APG SI data quality objectives as described in Worksheet #11 of the Arcadis 2020 APG UFP-QAPP Addendum state: If PFAS concentrations are less than the project screening levels, then a further stage of sampling will not be excluded. Therefore, the lack of sampling at the identified AOPI does not significantly impact the data quality objectives of the SI. Additionally, the conceptual site model for the Fords Farm AOPI does not identify any on-post or off-post receptor exposure scenarios for PFAS.

- Impact is minor; changes made were resolved and communicated to the client and accepted (see section below for documentation).
- Impact is major or critical; corrective action is necessary. Documentation for changes made include description of detailed investigation to determine cause of non-conformance (root cause analysis), description of action taken to correct condition, action taken to prevent recurrence, and description of action taken to monitor effectiveness of correction action (see separate Corrective Action Report form).

4. Communication of Change

ATC staff informed Arcadis on 20 January 2021 that there are certain areas within Fords Farm that are radiation contaminated. One of which, is one of the proposed sampling locations. Sampling at this location would require an ATC radiation officer to be on site to scan personnel and their equipment before being allowed to leave the area. With that, if any equipment came back with radiation contamination, the contractor would be responsible for their own decontamination before the equipment could leave the site.

On 22 January 2021, ATC staff called Arcadis staff to say that the range manager in charge of Ford's Farm expressed serious concerns over the sampling plan at the site, stating that it could take weeks or months for equipment to be cleared of radiation exposure.

On 22 January 2021, Arcadis staff emailed the Arcadis SI Project Manager, Arcadis Project Manager and Arcadis Deputy Project Manager to inform them of the range manager's concern. A motion was passed to omit the proposed sampling at the AOPI, citing health and safety concerns to on-site personnel.

The decision to omit the proposed sampling at Ford's Farm was communicated verbally to APG Installation Restoration Program, ATC, USACE, and USAEC representatives on 26 January 2021. All parties agreed to the motion.

5. Authorizations

	Title	Name
Reviewed by:	Site Inspection Project Manager (Arcadis U.S., Inc.)	Keith Shepherd
Approved by:	Project Manager (Arcadis U.S., Inc.)	Kimberley Schrupp/Rhonda Stone
Quality Control Review by:	Quality Control Manager (Arcadis U.S., Inc.)	Johnsie Lang

6. Remarks

Additional sampling at Ford's Farm was conducted as part of a supplemental SI mobilization in January 2022. Field Change Report (FCR-APG-02) details the supplemental SI scope of work conducted at Ford's Farm.

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Contract No:	W912DR-18-D-0004	Prepared By:	Matthew Blower
Project/Task No:	30001992.3BX50	Applicable Document:	Quality Assurance Project Plan Addendum: Worksheet #18 and associated figure(s)
Field Change Report No:	NCR-APG-02		

1. Description

One co-located surface soil and grab groundwater sample [APG-PI-12-1-GW/APG-PI-12-2-SO-(0-2)] was removed from the site inspection scope of work. Two co-located surface soil and grab groundwater samples [APG-PI-12-1-GW/APG-PI-12-2-SO-(0-2) and APG-PI-12-2-GW/APG-PI-12-2-SO-(0-2)] were added to the site inspection scope of work at the actual location of aqueous film-forming foam (AFFF) release at Range 12.

- Minor Change
- Major Change
- Major Project Impact

2. Reason for Change

During utility mark-outs at the Poverty Island Minefield Range area of potential interest, the range manager informed Arcadis staff that the identified "Range 12" site was in fact named Range 18 and confirmed that AFFF was not released in this area. The range manager escorted Arcadis staff to the actual Range 12 location and detailed the history of AFFF release in the area. Arcadis staff on site, along with the Aberdeen Proving Ground Installation Restoration Program representative, reviewed the information provided by the Minefield Range manager and groundwater flow direction to develop a new sample plan at the actual Range 12 to determine presence/absence of per- and polyfluoroalkyl substances.

3. Impact on Present and Completed Work

Site history as detailed during the Preliminary Assessment applies to the actual Range 12. No impact to the overall scope of project work is anticipated based on the change in project scope.

- Impact is minor; changes made were resolved and communicated to the client and accepted (see section below)

for documentation).

- Impact is major or critical; corrective action is necessary. Documentation for changes made include description of detailed investigation to determine cause of non-conformance (root cause analysis), description of action taken to correct condition, action taken to prevent recurrence, and description of action taken to monitor effectiveness of correction action (see separate Corrective Action Report form).

4. Communication of Change

ATC staff informed Arcadis on 28 January 2021 that the figure showing the proposed sample points at “Range 12” were actually located at Range 18. Arcadis presumed that they had mislabeled the site, and prior to utility mark outs, updated figures to show this area as Range 18. During utility mark outs conducted at the site on 09 February 2021, Arcadis confirmed with the Poverty Island Minefield Range Manager that AFFF was not released at Range 18, but that AFFF releases occurred at Range 12. Arcadis staff had been unable to visit the actual Range 12 during the preliminary assessment and had misidentified the location of Range 12 in field notes. Arcadis staff on-site, along with the Aberdeen Proving Ground Installation Restoration Program representative, reviewed the information provided by the Poverty Island Minefield Range Manager and groundwater flow direction of the area to develop a new sample plan to determine presence/absence of per- and polyfluoroalkyl substances at the actual Range 12 area of potential interest.

On 03 March 2021, a new dig permit was cleared for excavation activities at the actual Range 12 site.

5. Authorizations

	Title	Name
Reviewed by:	Site Inspection Project Manager (Arcadis U.S., Inc.)	Keith Shepherd
Approved by:	Project Manager / Deputy Project Manager (Arcadis U.S., Inc.)	Rhonda Stone Kimberley Schrupp /
Quality Control Review by:	Quality Control Manager (Arcadis U.S., Inc.)	Johnsie Lang

6. Remarks

No additional remarks to provide.