

1 **Modeling a Well-Characterized Perfluorooctane Sulfonate (PFOS) Source and**
2 **Plume Using the REMChlor-MD Model to Account for Matrix Diffusion**

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13 **KEYWORDS**

14 PFAS, PFOS, Matrix Diffusion, Fate and Transport, Modeling, REMChlor-MD,
15 Remediation

16

17 **ABSTRACT**

18 Two of the most important retention processes for per- and polyfluoroalkyl
19 substances (PFAS) in groundwater likely are sorption and matrix diffusion. The
20 objective of this study was to model concentration and mass discharge of one
21 PFAS, perfluorooctane sulfonate (PFOS), with matrix diffusion processes
22 incorporated using data from a highly chemically- and geologically-characterized
23 site. When matrix diffusion is incorporated into the REMChlor-MD model for PFOS

24 at this research site, it easily reproduces the field data for three key metrics
25 (concentration, mass discharge, and total mass). However, the no-matrix diffusion
26 model produced a much poorer match. Additionally, after about 40 years of
27 groundwater transport, field data and the REMChlor-MD model both showed the
28 majority (80%) of the measured PFOS mass that exited the source zones was
29 located in downgradient low permeability zones due to matrix diffusion. As such,
30 most of the PFOS mass is not available to immediately migrate downgradient via
31 advection in the more permeable sands at this site, which has important
32 implications for monitored natural attenuation (MNA). Plume expansion over the
33 next 50 years is forecasted to be limited, from a 350-meter plume length in 2017 to
34 550 meters in 2070, as matrix diffusion will attenuate groundwater plumes by
35 slowing their expansion. This phenomenon is important for constituents that do not
36 degrade, such as PFOS, compared to those susceptible to degradation. Overall,
37 this work shows that matrix diffusion is a relevant process in environmental PFAS
38 persistence and slows the rate of plume expansion over time.

39

40 **INTRODUCTION**

41 PFAS have recently appeared as a chemical of emerging concern in soil and
42 groundwater. Several quantitative metrics indicate the potential scale of future
43 cleanup of groundwater sites with PFAS could be extensive (Newell et al., 2020).
44 Specifically, a symposium of 60 PFAS experts concluded that due to their mobility,
45 persistence, and technical limitations to remediation, PFAS present more complex
46 challenges as compared to other chemicals (Simon et al., 2019). While Simon et al.,
47 (2019) noted there are some uncertainties regarding PFAS transport parameters,

48 conservatives assumptions can be used to evaluate different scenarios for PFAS
49 transport.

50

51 Developing appropriate fate and transport modeling approaches for PFAS is critical
52 for evaluating risk at impacted sites, as well as understanding what remedies or site
53 management options are viable for addressing that risk. Without the ability to make
54 planning-level predictions about plume behavior over time, it is difficult for decision-
55 makers to avoid expensive cleanup technologies such as groundwater pump and
56 treat as a conservative measure. It also limits the technical justification for selecting
57 less-intensive strategies for PFAS such as Monitored Natural Attenuation (MNA).
58 MNA already faces a significant hurdle in that PFAS are not expected to transform
59 beyond perfluoroalkyl acids (PFAAs) under natural environmental conditions.
60 However, retention-based processes can form the basis for applying Monitored
61 Natural Attenuation to manage PFAS impacts in groundwater (Newell et al., 2021a,
62 Newell et al. 2021b), assuming an understanding of how these processes influence
63 PFAS plumes can be established.

64

65 Two of the most important retention processes for PFAS in groundwater are likely to
66 be sorption and matrix diffusion. The extent to which sorption contributes to
67 retardation of PFAS during groundwater transport is a function of aquifer properties
68 but also the complex and diverse physical-chemical properties of PFAS as a
69 chemical class (Higgins et al., 2007, Anderson et al., 2019, Adamson et al., 2021).
70 Because they exhibit surfactant-like properties, PFAS can partition to air/water
71 interfaces that are present within the pore space in the unsaturated zone. PFAS can
72 sorb hydrophobically to naturally occurring organic matter on soils, to Non-Aqueous

73 Phase Liquids (NAPLs), and through electrostatic interactions with soil mineral
74 phases. Because PFAS are typically released to the environment as a mixture with
75 various different charges (some are anions, some cations, some zwitterions) and
76 hydrophobicity, individual PFAS can have a range of sorption characteristics. For
77 example, long chained PFAS will usually sorb more readily than short chained
78 PFAS, and desorption hysteresis and competitive sorption among different PFAS
79 have the potential to impact PFAS transport (Sima and Jaffe, 2021). Similarly,
80 cationic and zwitterionic PFAS will tend to sorb more readily to soils than anionic
81 PFAS such as PFOS and PFOA (Guelfo et al., 2013, Li et al., 2018) given the
82 negative surface charges associated with many soil particles (e.g., clays).

83

84 The role of matrix diffusion in groundwater transport was first identified by Foster
85 (1975) in the Chalk aquifer in southern and eastern England. This term is used to
86 describe the concentration gradient-driven mechanism where chemicals are
87 exchanged from media with high permeability to regions of lower permeability (or
88 “low-k”, as described in Sale et al. [2013]) diffusion. Sudicky et al., (1982) and
89 Gillham et al. (1984) initially showed how matrix diffusion can slow and attenuate
90 solutes moving in heterogeneous geologic settings.

91

92 Another key consequence of matrix diffusion is the chemical release from low-k
93 zones via back diffusion (outward diffusion) and slow advection once the
94 concentrations in the transmissive zones drop either due to natural or engineered
95 reduction in source strength or direct remediation of groundwater plumes (Chapman
96 and Parker, 2005; NRC, 2005; Sale et al., 2008; NRC, 2013; Sale et al., 2013;
97 USEPA, 2019; You et al., 2020; Brooks et al., 2021).

98

99 Factors controlling the rate of diffusion to and from low-k regions include diffusion
100 and slow advection. Diffusion incorporates the difference in concentrations between
101 the transmissive and low-k media, the amount of time chemicals are in contact with
102 low-k zones, the diffusivity of the chemicals, and the porosity/tortuosity of the low-k
103 media (Sale et al., 2013). Modeling matrix diffusion can prove challenging because
104 there are only limited number of commercially available analytical groundwater
105 models that account for matrix diffusion (e.g., Chapman et al., 2012; Farhat et al.,
106 2012; Muskus and Falta, 2018; Falta et al., 2018) and numerical models can result
107 in erroneous results if the vertical discretization is too coarse (Chapman and Parker,
108 2005; Farhat et al., 2020). However, failing to account for matrix diffusion in models
109 leads to faulty predictions, thus hindering effective remediation strategies (Adamson
110 and Newell, 2014; OSWER, 2019).

111

112 There has been extensive research on trying to model PFAS transport in the
113 vadose zone (e.g., Brusseau, 2018; Brusseau et al., 2019; Constanza et al., 2019;
114 Silva et al., 2020; Guo et al., 2020). However, there are very few reports of
115 groundwater modeling of PFAS fate and transport in the saturated zone, particularly
116 those that evaluate plume behavior over time. In a recent study by Farhat et al.
117 (2021), the REMChlor-MD model (Falta et al., 2018) was applied to explore the
118 general behavior of non-degrading groundwater plumes like PFOS and PFOA,
119 particularly with regard to retention-based attenuation caused by matrix diffusion
120 processes. The resulting analysis concluded that non-degrading plumes would
121 continue to expand over time assuming a constant source, but matrix diffusion will
122 result in lower concentrations and smaller footprints. For instance, in a 100-year

123 travel time scenario modelled with matrix diffusion, the resulting PFOS plume length
124 was only 20% as long as a scenario without matrix diffusion (Farhat et al., 2021).
125 These results help highlight the potential relevance of matrix diffusion on PFAS fate
126 and transport, which along with sorption and partial biotransformation could be
127 expected to influence PFAS retention within heterogeneous saturated zones.

128

129 This study presents a novel application of a matrix diffusion model (REMChlor-MD)
130 to simulate the history and potential future migration of an actual PFOS plume at a
131 well-characterized research site. Here, PFOS transport was modeled using site-
132 specific data from a highly chemically and geologically characterized fire training
133 area (FTA) where significant PFAS mass was encountered in low-k soils (Nickerson
134 et al., 2020; Adamson et al., 2020). Because the current state of knowledge
135 suggests that PFOS does not degrade in the environment, the modeling focuses on
136 non-destructive attenuation processes such as sorption and matrix diffusion. As
137 such, the objective of this study was to model concentration and mass discharge of
138 PFAS with matrix diffusion processes incorporated to show how these influence
139 plume length and remedial performance. This work establishes, as with almost all
140 contaminants, that contaminant storage and release to and from low k zones (matrix
141 diffusion, slow advection) is also relevant in PFAS source zones and plumes. As
142 with many contaminant releases, failing to consider matrix diffusion has the
143 potential to lead to flawed assessments of risk and/or selection of remedies for
144 PFAS releases.

145

146 **SITE BACKGROUND**

147 The study area is a former firefighting training facility located within a military
148 installation in the United States. A high-resolution site characterization program was
149 conducted in 2017, consisting of 16 locations selected from within the source and
150 downgradient areas. Here, site characterization was conducted in the upper 10-15
151 m of a surficial aquifer using a Hydraulic Profiling Tool (HPT), as well as collecting
152 co-located depth-discrete soil and groundwater samples using a Geoprobe drilling
153 rig. A detailed description of the field sample collection methods and analytical
154 protocols are provided in Nickerson et al., (2020).

155

156 A total of 58 groundwater samples were collected and analyzed for 79 PFAS at
157 Oregon State University (OSU), while 105 soil samples were collected and analyzed
158 for 136 PFAS at Colorado School of Mines (CSM) (Adamson et al., 2020; Nickerson
159 et al., 2020). Both the groundwater and soil data were used to quantify the following
160 PFAS groupings: (1) PFOS; (2) PFOA; (3) Total PFAAs; (4) Total Cations and
161 Zwitterions; (5) Total Precursors; and (6) Total PFAS.

162

163 **Hydrogeology**

164 Based on results from subsurface drilling using a Hydraulic Profiling Tool (HPT) and
165 logging of cores collected during the field characterization, there are four main soil
166 types in the water-bearing unit. Using the Universal Soil Classification System
167 (USDA, 2012), these were: (1) Poorly Graded Sands (SP); (2) Sands with Fines
168 (SM); (3) Silt (ML); and (4) Clays with low plasticity (CL).

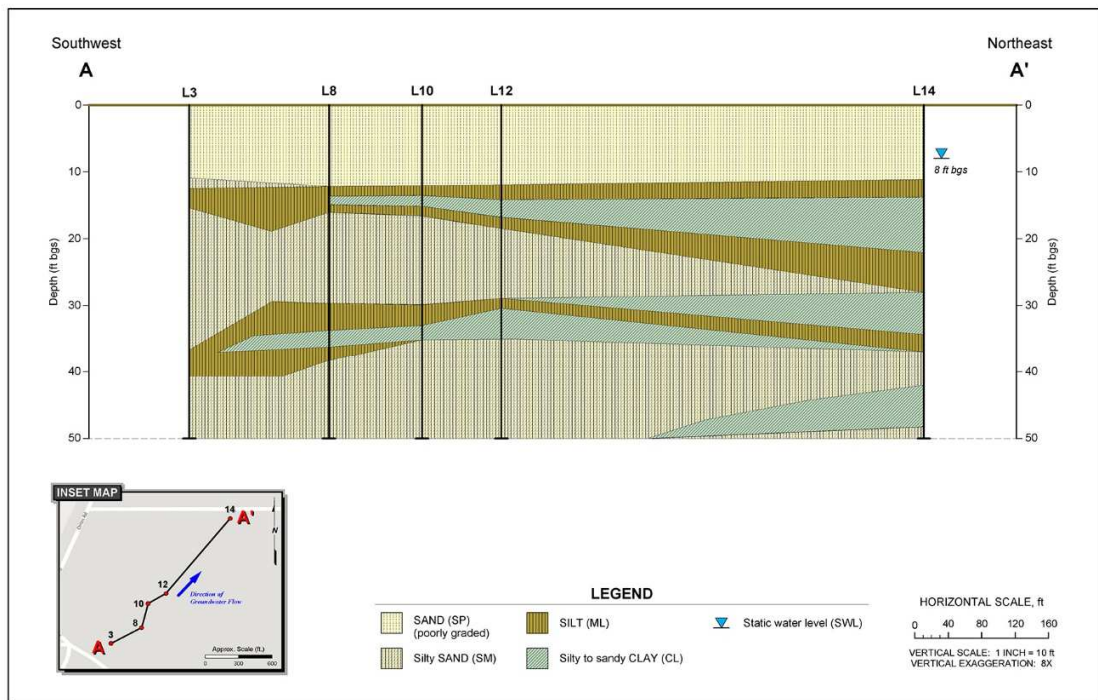
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170 Specifically, the subsurface at this site is composed primarily of permeable sands
171 and less permeable silts and clays (Adamson et al., 2020). Sands dominate the first
172 1 to 2 meters of the site, forming a thin vadose zone as a shallow aquifer is
173 encountered within the first two meters of the subsurface. Laterally extensive clays
174 appear at depths between 3 to 4.5 meters, with a second layer of silt/clay present at
175 around 10 meters (Nickerson et al., 2020). Additionally, based on site documents
176 describing the hydrologic setting, the aquifer consists of undifferentiated terrace and
177 shallow marine deposits of Pliocene to Holocene age associated with glacial and
178 inter-glacial periods (USGS, 2000). Figure 1 shows a cross section of the study site
179 along the direction of groundwater flow depicting key soil types and stratigraphy.
180 Groundwater flows in a north to northeast direction from the study area towards a
181 river (Nickerson et al., 2020).

182

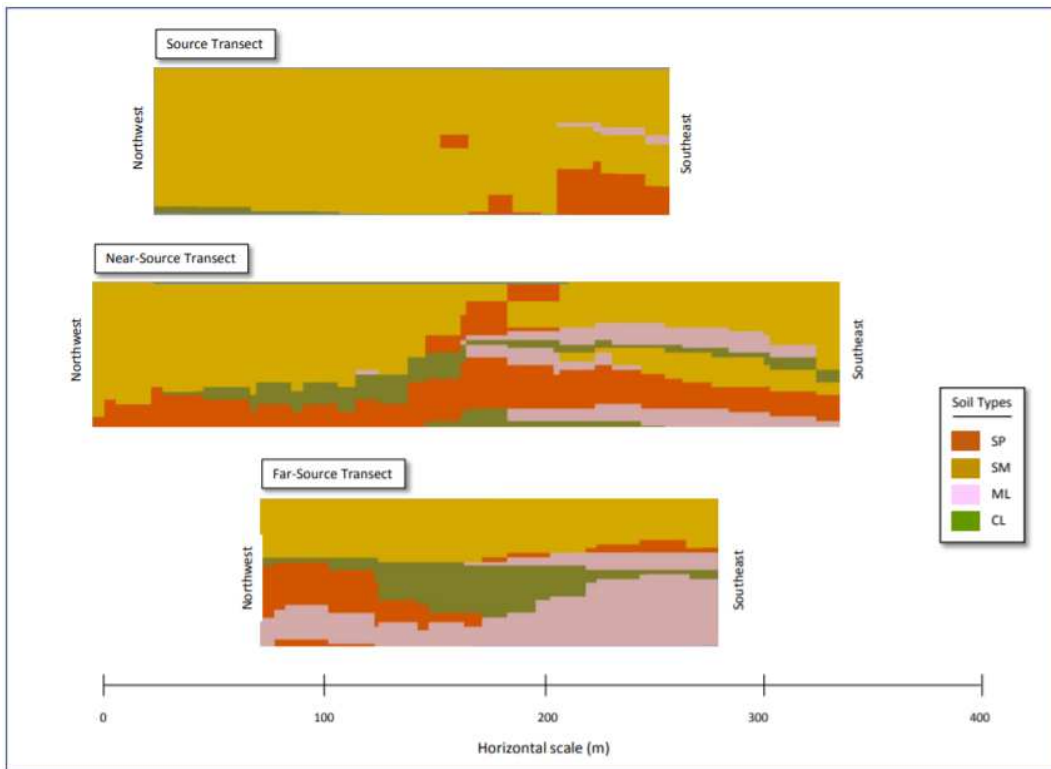
183 Two slug test results were available for two monitoring wells screened in the most
184 transmissive geologic media, Poorly Graded Sands (SP) as defined by the
185 Universal Soil Classification System (USDA, 2012). Here, slug test results together
186 had geomean hydraulic conductivity of 2.4×10^{-3} cm/sec (6.8 ft/day) (Consultant
187 Report, 2017). When combined with an estimated effective porosity of 0.10 and the
188 measured hydraulic gradient of 0.00375 m/m, the estimated seepage velocity for
189 the most transmissive sands was 28 m/year (93 ft/year). The effective porosity is a
190 key parameter for the transport model applied at this site. The environmental
191 consulting company that performed the slug tests used an effective porosity of 0.05
192 for their seepage velocity calculations, citing "*While silty sand may have an average*
193 *porosity of between 25 and 60 percent, the effective porosity is usually estimated at*
194 *about 5 percent.*" (Consultant Report, 2017). These effective porosities, while lower

195 than some groundwater modeling studies, are supported by the “mobile porosity”
 196 model developed by Payne et al. (2008) that was based on approximately 15
 197 detailed tracer tests at remediation sites. Similarly, Kulkarni et al. (2020) evaluated
 198 141 boring logs from 43 sites to develop an empirical estimate of a representative
 199 mobile porosity, resulting in a value of approximately 0.11.
 200



201
 202 **Figure 1. Geologic Cross-Section of Site Along Direction of Groundwater Flow**

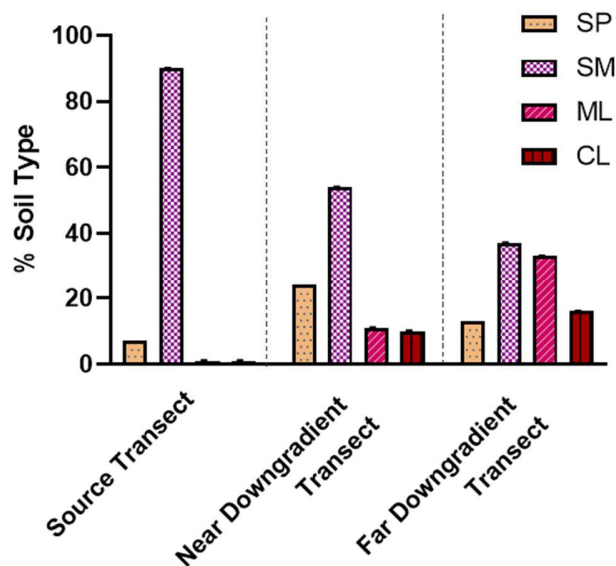
203
 204 Additionally, three spatial compartments were used to define the PFAS plume:
 205 Source Transect, Near Downgradient Transect, and Far Downgradient Transect.
 206 Figures 2 and 3 depict the relative distribution of the different soil types in the three
 207 spatial compartments.



208

209 **Figure 2. Soil Type Across Three Transects (Reprinted with permission from**
 210 **Adamson et al., 2020. Copyright 2020 American Chemical Society).**

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213 **Figure 3. Distribution of Soil Types by Transect.** Transect locations and cross-sections
 214 depicted in Figure 2

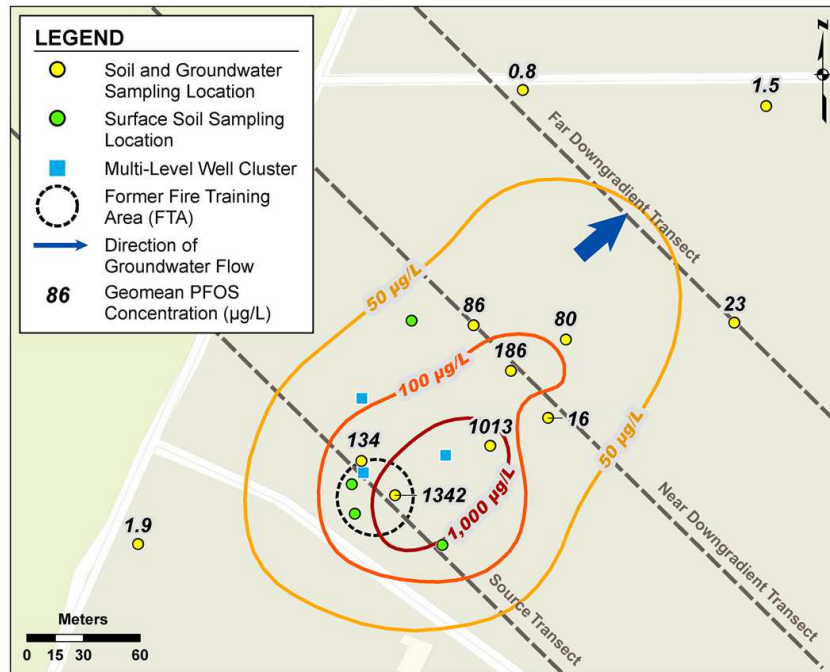
215 **PFAS Source and Plume Characteristics**

216 Between 1968 and 1991, site personnel used aqueous film-forming foam (AFFF)
217 while training to extinguish fires in a pit measuring approximately 36 meters in
218 diameter (Adamson et al., 2020; Nickerson et al., 2020). Given the known presence
219 of PFAS in AFFF, a site characterization was carried out starting in 2017 in an effort
220 to determine the spatial distribution of PFAS in the shallow aquifer (Adamson et al.,
221 2020; Nickerson et al., 2020). While AFFF was only released within the training pit,
222 impacts to adjacent areas is possible due to overspray (Adamson et al., 2020;
223 Nickerson et al., 2020)). Soils from the study area have previously been the focus of
224 a 1994 remediation project for non-PFAS chemicals where petroleum-impacted
225 soils were removed from the pit and remediated at a mobile low-thermal desorption
226 treatment unit (Adamson et al., 2020; Nickerson et al., 2020). Following treatment,
227 the soils were returned to the pit.

228

229 Based on depth-discrete groundwater sampling, Figure 4 depicts the PFOS
230 groundwater plume at the site. Figure 5 uses depth-discrete soil sampling data to
231 show a three-dimensional depiction of PFOS mass in subsurface soil.

232



233

234 **Figure 4. PFOS in Groundwater Plume Map.** Concentrations represent geomean of depth-
 235 discrete samples at 3.05 m and 6.1 m bgs.
 236

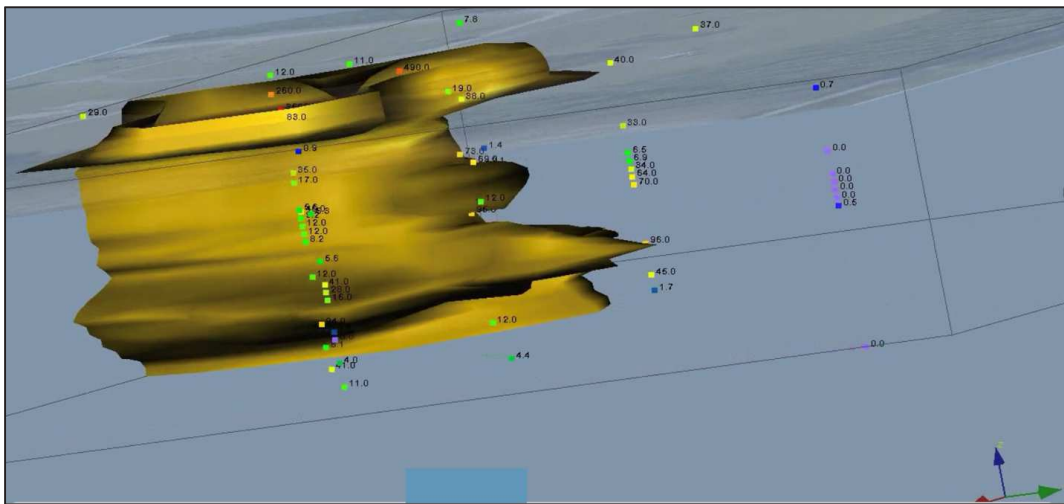
237 **METHODS**

238 **PFAS Mass and Mass Discharge Estimation Process**

239 Adamson et al. (2020) employed the Voxler® interpolation tool (Version 4.6.913,
 240 Golden Software, 2019) to develop a three-dimensional grid of the PFAS data and
 241 soil types. As described by Adamson et al. (2020), a total of 58 groundwater
 242 samples were analyzed for 79 PFAS compounds by Dr. Jennifer Fields' lab at
 243 Oregon State University (OSU). These data were kriged using GMS and then used
 244 by the Voxler tool to develop a three-dimensional model of soil concentrations for
 245 key PFAS and PFAS classes and for soil type. The Voxler tool was then able to
 246 calculate masses of these categories in different regions of the site (e.g., source,
 247 near downgradient, far downgradient) and in different soil types. A total of 105 soil
 248 samples were analyzed for 136 PFAS compounds by Dr. Chris Higgins' lab at the

249 Colorado School of Mines (CSM). The Voxler model was used to construct a three-
250 dimensional model of concentrations for key PFAS and PFAS categories which was
251 then used to calculate mass discharge across the three transects (Adamson et al.,
252 2020). A visualization of the PFOS subsurface mass generated by the Voxler
253 model is shown in Figure 5.

254



255
256
257
258

Figure 5. Three-Dimensional Depiction of PFOS Mass in Soil with Cutoff Limit of 100 ng/kg.

259 Additionally, the PFAS compartment model provided a quantitative dataset showing
260 where PFAS were distributed in the subsurface in 2017, including how much was in
261 the source vs. plume, in the transmissive vs. low-k geologic media, and in the
262 aqueous-phase vs. sorbed phase (see Figures 1, 2, and 3 respectively in Adamson
263 et al., 2020). Here, the source was defined by knowledge of historic site activities
264 and their spatial footprint, as well as site-characterization data confirming
265 significantly higher concentrations. Additionally, the mass discharge data showed
266 the rate that PFAS are transported through the transmissive zone at three different
267 vertical transects of the source/plume system to establish the physio-chemical
268 natural attenuation of PFAS at this site.

269

270 For the current modeling study, PFOS was selected as the PFAS of interest
271 because it was the most prevalent PFAS, representing 40 kg of the total 222 kg of
272 Total PFAS at the site (Adamson et al., 2020). Key PFOS mass in various soil types
273 from the Voxler tool are shown in Table 1:

274

Table 1. PFOS Mass by Spatial Location and Soil Type (kg)

Spatial Location	Total	SP	SM	ML	CL
	Mass (kg)				
Up/Side-Gradient Plume	10.4	1.7	8.1	0.5	0.0
Source	6.6	1.5	4.9	0.3	0.0
Near Downgradient	16.9	2.9	11.4	2.3	0.3
Far Downgradient	6.0	1.8	2.1	0.9	1.3
Total Source + Plume	39.9	7.8	26.4	4.0	1.7

275 Note: PFOS mass per soil type depicted in light yellow (0-0.9 kg), dark yellow (1-4.9 kg), and orange
276 (>5 kg).

277

278 The tool also yielded three PFOS mass discharge values for the three transects
279 shown in Figure 2:

- 280 • Source Transect (0 m from source): 0.31 kg/yr (87% through SP soils)
- 281 • Near Downgradient (114 m from source): 0.13 kg/yr (98% through SP soils)
- 282 • Far Downgradient (190 m from source): 0.0053 kg/yr (85% through SP soils)

283 For estimating the source mass discharge history that was applicable at this site,
284 several commonly used options that involve simple functions over time were initially
285 considered (e.g., Newell and Adamson, 2005):

- 286 • Constant source over time until the source mass is depleted (Step Function);
- 287 • Linearly decaying source until the source mass is depleted; and
- 288 • Exponentially decaying source based on the source mass.

289 A more sophisticated source model that was also considered was the power
290 function model (sometimes referred to as the “gamma model”) where the change in

291 source strength over time is a function of the change of source mass over time to a
292 defined power (γ) (Rao et al., 2001; Falta et al., 2005). Assigning a value of
293 zero for γ gives a step function for the source strength, 0.5 gives a linear
294 decline in source strength, and a γ of 1.0 gives an exponential decay. Other
295 values give a hybrid between these different models, with values greater than 1.0
296 giving long, slowly changing extended source strength tails.

297

298 To determine which of these simple models was best suited for modeling the PFOS
299 source strength over time at this research site, an initial exploratory evaluation of
300 the 2017 mass and mass discharge data was performed. The best available site
301 records indicated that fire-fighting training activities at the site with AFFF started in
302 approximately 1968, although the records are not definitive. In general, PFAS-
303 containing fire-fighting foams for the U.S. military were introduced in the late-1960s
304 (3M, 2021), so much earlier dates of release to groundwater are unlikely. Later
305 releases to groundwater are possible, particularly considering the time it takes for
306 PFAS from the vadose zone source to migrate to groundwater (e.g., Guo et al.,
307 2020). By the year 2017 (49 years later), the mass of Total PFAS in the
308 downgradient plume was measured to be 117 kg, and the mass discharge from the
309 source/upgradient/side gradient zones was estimated to be 3.6 kg/yr (Adamson
310 et al., 2020). While these are not precise estimates due to uncertainties in the
311 historical record and in the mass and mass discharge calculations, they can form
312 the basis for developing a hypothesis regarding the source strength history. For
313 example, a constant mass discharge of 3.6 kg/yr of PFAS over 49 years (1968 to
314 2017) would have delivered 176 kg of PFAS to the downgradient plume, about 1.5
315 times the measured mass. A higher source in 1968 that declines to 3.6 kg/yr in

316 2017 would have introduced even more PFAS mass to the downgradient plume,
317 increasing the discrepancy between modeled and measured PFAS mass. This
318 information suggested the best model for fitting these data was a constant source
319 (step function).

320

321 However, even the constant source model overpredicted the measured
322 downgradient plume PFAS mass in 2017. Therefore, the initiation of PFAS mass
323 discharge to the downgradient plume was hypothesized to start nine years after
324 1968 in 1977 to yield a calculated downgradient mass of 144 kg ($3.6 \text{ kg/yr} \times 40$
325 years) compared to the measured mass of 120 kg. It is possible that fire-fighting
326 training was started at a low level in 1968, but then increased significantly in the late
327 1970s. The better match with the 40-year time may also be caused by the slow
328 vertical migration of the PFAS through the vadose zone, where it might have
329 partitioned to the air/water interfaces, and then via slow downward radial flow to
330 groundwater. No degradation of Total PFAS was assumed because any
331 transformation of PFAS precursors would have been matched by a similar mass of
332 PFAA's generated from the transformation.

333

334 The matches for individual PFAS varied. The constant source model overestimated
335 PFOS mass in the downgradient plume by 44% but underestimated PFOA by about
336 50%). The match between constant source model and the measured field data were
337 relatively close for PFAAs and Total Precursors (data not shown). Because of this
338 variability between different PFAS and PFAS classes, the timing analysis based on
339 the Total PFAS mass discharge and measured downgradient Total PFAS mass was
340 used for the modeling analysis. Overall, this comparison concludes that unlike the

341 mass discharge patterns typically observed at chlorinated solvent or benzene,
342 toluene, ethylbenzene, xylene (BTEX) sites (e.g., see Newell et al., 2014), this
343 PFAS site may have had a relatively constant mass discharge from the source for
344 the past ~40 years.

345

346 Because PFOS was the key focus of this modeling research, an additional
347 evaluation was performed to increase the confidence in these field-based mass
348 estimates. An independent analysis of the potential amount of PFOS that could
349 have been introduced into the subsurface was performed based on historical use
350 data at firefighting training sites, as described in Adamson et al., (2020),
351 Supplemental Information. This historical usage estimate indicated it was possible
352 that about 81 kg of PFOS could have been released during fire-fighting training
353 events during the lifetime of the site. The 81 kg is within a factor of two compared to
354 the more reliable measured PFOS mass of 40 kg, a relatively close match
355 considering the uncertainties in the historic usage estimate. Additional uncertainties
356 include the transformation of precursors to PFOS (historically or ongoing), as no
357 precursors or biotic transformation to PFOS has been accounted for in mass
358 estimates in the source or downgradient **because rate data are relatively limited**
359 **(Adamson et al., 2020)**. In addition, the site data presented in Adamson et al. (2020)
360 showed that precursors were primarily located in the source area, such that
361 transformation to PFOS within the plume would be minimal.

362

363

364

365 **REMChlor-MD Model Overview**

366 These data were used to evaluate a novel application of a recently released ESTCP
367 groundwater fate and transport model, REMChlor-MD (Falta et al., 2018; Farhat et
368 al., 2018), for the PFOS plume at the site. While designed for chlorinated solvent
369 sites, REMChlor-MD can be adapted to simulate groundwater transport at PFAS
370 sites. REMChlor-MD consists of a simple source model coupled to a semi-
371 analytical plume transport model. The source model uses a power-law relationship
372 to define the long-term relationship between the remaining source mass and the
373 mass discharge leaving the source at any time. The plume model uses a semi-
374 analytical method with defined gridblocks to simulate advection, dispersion,
375 retardation, and degradation. In addition, the plume model can simulate matrix
376 diffusion effects for two different geologic configurations: 1) low-k aquitards in
377 contact with transmissive geologic media, and 2) the effect of low-k layers and
378 lenses embedded within the transmissive media. The embedded matrix diffusion
379 term was derived by Falta and Wang (2017) and Muskus and Falta (2018) by
380 adapting heat conduction models developed by Vinsome and Westerveld (1980).
381 To use this feature in the model, users enter transmissive vs. low-k layering
382 information contained in existing geologic boring logs into the model's
383 "heterogeneity calculator" which then calculates three key matrix diffusion variables
384 used by the model: 1) the volume fraction of low-permeability material; 2) the
385 characteristic maximum matrix diffusion length; and 3) the surface area of the
386 transmissive/low-k interfaces within each defined gridblock.

387

388 With the high-resolution field data, reliable estimates of the mass of different PFAS
389 and PFAS groups were used to bound how much PFAS was released at the AFFF

390 Fire Training Facility and the original mass discharge to groundwater in 1968. With
391 these values, the evolution/attenuation of a PFAS source and plume considering
392 matrix diffusion was reconstructed, potentially for the first time.

393

394 The REMChlor-MD model uses a linear isotherm to describe sorption of the
395 chemicals in both the transmissive and low-k zones of the model and cannot use
396 any other type of isotherm. PFAS sorption is the focus of considerable research,
397 and a variety of isotherms have been used to represent sorption, such as
398 Freundlich, Langmuir, Virial, and linear isotherms. Sima and Jaffe (2021) evaluated
399 the appropriateness of various isotherm types and stated that "...at low PFAS
400 concentrations, a linear K_d may be sufficient depending on soil-PFAS-solvent
401 interaction," citing four studies (Milinovic et al., 2015; Miao et al., 2017; Wei et al.,
402 2017; Li et al., 2019) as support for this statement. It should be noted that each of
403 these four studies cited in Sima and Jaffe (2021) had different conclusions about
404 which models fit their experiment data better and had different upper concentration
405 thresholds for use of a linear isotherm. More importantly, the four papers did not
406 suggest a single Freundlich model with a specific Freundlich n value that would be
407 appropriate for modeling a particular site. Therefore, for the REMChlor-MD model,
408 the use of the linear isotherm was considered an appropriate approach for this early
409 attempt to modeling PFAS in groundwater.

410

411 Using the REMChlor-MD model, the change in the PFAS Compartment Model was
412 simulated, starting from the source reaching groundwater (around 1978) to the near
413 present (2017), where the model can be adjusted to match the measured
414 compartment data, and then most importantly, into the future. With this model, key

415 questions about the site were addressed related to the migration of PFAS over the
416 past 40 years under the influence of advection, dispersion, sorption, and matrix
417 diffusion. The model was then used to indicate how far the plume might migrate in
418 future years, and better understand the effectiveness of a hypothetical complete
419 source removal project on controlling plume migration.

420

421 As such, the following model simulations for PFOS were used, and focused on
422 these key dates and subsequent REMChlor-MD evaluations:

- 423 • **1977:** PFOS from the source reached groundwater with a relatively
424 constant source strength, thereby creating the downgradient PFOS plume.
- 425 • **2017:** High-resolution site characterization was performed. REMChlor-MD
426 analyses included:
 - 427 1) Comparison of three different REMChlor-MD models (Model A, Model
428 B, Model C) with three different representations of matrix diffusion to
429 determine which model best fit the measured site data;
 - 430 2) Application of one best-fit model to evaluate chemical profiles with and
431 without matrix diffusion.
- 432 • **2020:** Hypothetical complete source removal project modeled in REMChlor-
433 MD.
- 434 • **2040:** Plume length forecasted at about 20 years into future from present
435 time (with and without source removal in year 2020).
- 436 • **2070:** Plume length forecasted at about 50 years into future from present
437 time (with and without source removal in year 2020).

438

439

440 **REMChlor-MD Input Data**

441 Site-specific characteristics were used as inputs into the REMChlor-MD models as
442 seen in Table 2. For geology, site-specific boring log data along the direction of
443 groundwater flow (Locations 3, 8, 10, 12, and 14) were used to quantify the number
444 and thickness of low-permeability layers within the plume and then entered into the
445 “heterogeneity calculator” used in the REMChlor-MD interface (Farhat et al., 2018).

446

447 For Model A, the REMChlor-MD transmissive zone was defined to include only
448 clean sands (Poorly Graded Sands (SP)). As previously described, two slug test
449 results were available for a monitoring well located in the most transmissive
450 geologic media (SP), with a geomean hydraulic conductivity of 2.4×10^{-3} cm/sec (6.8
451 ft/day) for this material. An evaluation of soil borings indicated the SP sands were
452 extensive enough to be continuous at the site. Therefore, the low-k geologic media
453 in Model A was defined as all fine-grained geologic soil layers with a hydraulic
454 conductivity 10 times lower than the geologic media in the REMChlor-MD
455 transmissive zone (Farhat et al., 2021). A single slug test was performed at a well
456 screened in Sands with Fines material (SM) and showed a hydraulic conductivity of
457 7.1×10^{-5} cm/sec (0.20 ft/day) or 34 times less than the more permeable SP sands.
458 Therefore, the SM soils were defined as being in the low-k compartment. The Silt
459 (ML) and Low Plasticity Clay (CL) soils were also classified as low-k units and had
460 estimated hydraulic conductivities that were 235 times and 1,821 times lower than
461 the hydraulic conductivity of the SP soils.

462

463 To evaluate the sensitivity of the REMChlor-MD model to the definition of what
464 comprises low-k media, Model B assumed that the silty sand soils (SM) and clean
465 sand (SP) were transmissive, and silt and clay (ML and CL) were low-k units.
466 Finally, Model C was constructed to simulate plume migration with no matrix
467 diffusion to represent conventional analytical groundwater fate and transport models
468 with no diffusion processes.

469

470 **Calibration Parameters and Best Match Metrics**

471 The calibration effort focused on developing a REMChlor-MD model that best
472 matched three key metrics from the 2017 site investigation:

- 473 • Concentration of PFOS at the furthest downgradient location (Location 14)
474 (note units of $\mu\text{g/L}$ per liter are used in the model interface). This is a proxy
475 for the measured plume length at the farthest downgradient monitoring well.
- 476 • Mass discharge (kg/yr) at the source, near transect, and far transects.
- 477 • Total mass (kg) of PFOS in the near downgradient and far downgradient
478 plumes (in both the low-k and transmissive zones).

479 Three model input parameters were used as calibration parameters:

- 480 • The groundwater seepage velocity, where the hydraulic conductivity and
481 hydraulic gradient were fixed with the measured values from the site and
482 seepage velocity was altered by changing the effective porosity;
- 483 • Longitudinal dispersivity (m); and
- 484 • The concentration in the source of the transmissive zone ($\mu\text{g/L}$).

485 These parameters were changed to find the best match to the three best-fit metrics.
486 As a simplifying assumption, no transformation of precursors to form PFOS was
487 assumed. When the high-resolution sampling was performed, most of the precursor
488 mass in 2017 was comprised of short chain precursors that could not form PFOS
489 (Adamson et al., 2020).

490

491 During the calibration, effective porosity of the transmissive zone was initially
492 maintained to an approximate range of 0.02 and 0.30. The lower range represents
493 effective porosity as described in the REMChlor-MD User's Manual (Farhat et al.,
494 2018) when accounting for the reference to Payne et al.'s (2008) "mobile porosity"
495 for unconsolidated hydrogeologic settings that typically falls in the 0.02 to 0.10
496 range. These lower effective porosities are being used more frequently in transport
497 calculations and modeling studies. For example, the environmental consultant
498 working at the site used an effective porosity of 0.05 for their transport calculations
499 at this site (Consultant Report, 2017) prior to the work on this research. For the
500 upper range, the REMChlor-MD Manual's upper range estimate of 0.30 for fine
501 sand was used (Farhat et al., 2018).

502

503 Initially longitudinal dispersivity was constrained to within the recommended range
504 in the REMChlor-MD manual (Farhat et al., 2018), between 3 and 21 meters.
505 Transverse dispersivity was assumed to be 10% of the longitudinal dispersivity.
506 Because the simulation assumed two-dimensional groundwater flow, vertical
507 dispersivity was not important to the model.

508

509 As recommended in Farhat et al. (2018), the model was run so the cell size in the x-
510 direction was always equal or less than two times the longitudinal dispersivity for
511 each model. Because of the low concentrations that are modeled for PFOS, a
512 convergence tolerance of 1×10^{-5} ug/L was used in the model.

513

514 The initial source concentration calibration parameter reflects the PFOS
515 concentration in the source in 1977, the year the simulation started. This
516 concentration is assumed to be relatively constant through the life of the simulation
517 because of the analysis previously described. To simulate a relatively steady state
518 source concentration, the REMChlor-MD “gamma” parameter was set to zero, that
519 when used in the Power Model, results in an unchanging source mass discharge
520 over time until the original source mass was exhausted. In the model, the mass
521 discharge leaving the source is about 0.44 kg/yr, and therefore the 40 kg of PFOS
522 in the source in the model would be exhausted in about 91 years after the year the
523 source started in 1977 or about the year 2068.

524

Table 2. Key REMChlor-MD Inputs for PFOS Models (2017)

Model Input	Value	Units	Source/ Notes
Years of Simulation	1977-2017	year	Historical fire training activities from 1968-1991; source began in 1977 to better match PFOS mass data in source and plume.
Transmissive Zone			
Soil Type	Poorly Graded Sand (SP)		Comprised of SP layers in Model A. Comprised of SP and SM layers in Model B.
Hydraulic Conductivity (K)	0.00239	cm/sec	Consultant Report, 2017.
Effective Porosity (Calibration parameter)	0.010 (Initial estimate) 0.11 (Model A) 0.18 (Model B) 0.28 (Model C)	(-)	Most likely value ranging between 0.02 and 0.30 from REMChlor-MD Users' Manual.
Tortuosity	0.50 (Model A and B) 0.000001 (Model C)	(-)	Default REMChlor-MD, based on K of transmissive zone media.
Hydraulic Gradient	0.0038	(-)	Consultant Report, 2017.
Primary Groundwater Flow Direction	Northeast		Towards Location 14.
Retardation Factor in T-Zone	2.9	(-)	Average R using soil-groundwater pairs of SP soil types (data from Adamson et al., 2020).
Longitudinal dispersivity (Calibration parameter)	15 (Initial Estimate) 15 (Model A) 4 (Model B) 3 (Model C)	m	Calculated in Recolor-MD using the Modified Xu and Eckstein method with plume length of 350 m.
Transverse dispersivity	1.5	m	10% of longitudinal dispersivity.
Low Permeability Zone			
Soil Type	Silt		Comprised of SM, ML, and CL layers in Model A. Comprised of ML and CL in Model B.
Hydraulic Conductivity	0.0000102	cm/sec	Consultant Report, 2017.
Porosity	0.43	(-)	Estimated using REMChlor-MD Interface based on silt.
Tortuosity	0.40	(-)	Default REMChlor-MD, based on K of low-k zone media (assumed to be silt).
Initial PFOS Source Concentration in 1977 (and subsequent years and gamma = 0 in REMChlor-MD model). (Calibration parameter)	1,342 (Initial Estimate) 1,600 (Model A) 1,400 (Model B) 1,600 (Model C)	ug/L	Calibration parameter used to match concentration of near source monitoring well. Initial estimate based on concentration of well closest to the source zone.
Source Mass at Time of Release	40	kg	Data from Adamson et al., 2020.
Retardation Factor in Low-K	2.67		Average R using soil-groundwater pairs of SM, ML and CL soil types (data from Adamson et al., 2020).
Source, Diffusion and Decay Characteristics			
Source Width	116	m	Approx. diameter of fire training area.
Molecular Diffusion Coefficient of PFOS	3.52E-6	cm ² /sec	MDEQ, 2015. For Model C, value of 3E-13 cm ² /sec was used (effectively no diffusion to account for no matrix diffusion).
Mass-Flux/Remaining-Mass Term (Gamma)	0		Constant source term.

526 **RESULTS AND DISCUSSION**

527 **Comparison of Three Different Model Calibrations**

528 The results of the calibration exercise are shown in Table 3 and Figure 6.

529

530 ***Model A (With Clean Sands as Transmissive Unit):*** Model A required very little
531 adjustment of initial parameter estimates, where the effective porosity was changed
532 from 0.10 to 0.11 and the initial source concentration was increased from 1,342 to
533 1,600 ug/L PFOS in 1978 (Table 2). The final calibration results presented in Table
534 3 shows the calibrated model was able to match measured PFOS concentration at
535 Location 14 quite closely (within 20%). The Root Mean Square Error (RMSE)
536 between the PFOS concentrations measured in the field and the simulated
537 concentration was $200 \text{ ug}^2 \cdot \text{L}^{-2}$, the best of all three models. Similarly, the RMSE for
538 the mass discharge ($0.049 \text{ kg}^2 \cdot \text{year}^{-2}$) comparison was significantly better than
539 Model B and just slightly better than Model C. Most importantly, the model was able
540 to reproduce the dominant feature of this site where significant mass is retained in
541 low-k units as expressed in the percent distribution of PFOS mass in the low-k/
542 transmissive media:

- 543
- 544 • Field Data: a total of 23 kg PFOS downgradient of the source, 80% in low-k
545 units comprised of SM, ML, and CL soils
 - 546 • Model A: 18.6 kg PFOS downgradient of the source, 86% in low-k units
547 comprised of SM, ML, and CL soils for a Low-K Mass Percent ratio of **1.08**
($86\% \div 80\%$) where 1.0 is a perfect match.

548

549 **Model B (Both Clean Sands and Silty Sands as Transmissive Units):** An
550 alternative conceptual model (Model B) was used for a second REMChlor-MD run
551 where all sands (both SP and SM) were defined as transmissive media, while low
552 permeability media included only silts and clays (ML and CL). This alternative model
553 assumes all the transmissive media have the same hydraulic properties, so the
554 hydraulic conductivity of the SP media was used to capture the high flow nature of
555 this water-bearing unit. The Model B RMSE errors for both concentration and mass
556 discharge were higher than Model A. When calibrated to the best extent possible
557 (effective porosity of 0.25 and longitudinal dispersivity of 3 m), Model B significantly
558 overestimated the percent of mass in the low-k compartment:

- 559 • Field Data: a total of 23 kg PFOS downgradient of the source, 21% in low-k
560 units comprised of only ML/CL soils as a modified definition of “low-k” units;
- 561 • Model B: 31 kg PFOS downgradient of the source, 61% in low-k units
562 comprised of only ML/CL soils for a Low-K Mass Percent ratio of **2.9**
563 (61%÷21%) where 1.0 is a perfect match.

564 This evaluation of the alternate conceptual model where SM sands were lumped
565 together with SP sands did not provide a good calibration to the percent mass in
566 low-k units metric, and therefore supports the conceptual model (Model A) where
567 only SP (Clean Sands) comprise the transmissive compartment.

568

569 **Model C (No Matrix Diffusion):** An additional calibrated No Matrix Diffusion model
570 was attempted. An initial REMChlor-MD model run resulted in a too long
571 groundwater plume that significantly overpredicted concentrations at Location 14,
572 the most downgradient well. Here, in order to shorten the plume and match the field
573 data, calibration parameters of effective porosity and longitudinal dispersivity were

574 applied. The Model C RMSE error for concentration ($886 \text{ ug}^2\cdot\text{L}^{-2}$) was significantly
 575 larger compared to Model A and Model B (200 and $300 \text{ ug}^2\cdot\text{L}^{-2}$, respectively). As
 576 seen in Figure 6, the simulated concentration and mass discharge curves provide a
 577 good match to field data, but only with an extreme value of effective porosity. As a
 578 no matrix diffusion model, the Low-K Mass Percent ratio was **0.0** (i.e., Adamson et
 579 al. (2020) definitely shows significant PFAS mass present in low-K media, but this
 580 conceptual model assumes there is none). As such, this model was not considered
 581 in future simulations.

582

583
584

Table 3. Comparison of Calibrated Models

	<i>Model A</i>	<i>Model B</i>	<i>Model C</i>
Matrix Diffusion Used in Model?	YES	YES	NO
Definition of Low-k Units?	SM, ML, CL	ML, CL	None
Concentration at Loc. 14 (ng/L) (Downgradient Well)	Field Data: 1.67 Model: 1.60	Field Data: 1.67 Model: 1.54	Field Data: 1.67 Model: 1.23
Concentration RMSE (Range in Field Data: 1,342 to 1.67 ug/L)	200	300	886
Mass Discharge RMSE (Range in Field Data: 0.31 to 0.0053 kg/yr)	0.049	0.30	0.13
(Field Data Mass in Low-k Units) ÷ (Modeled Mass in Low-k units) (1.0 is perfect match)	1.08	2.9	0.0
Input Parameters within REMChlor-MD recommended ranges?	YES	YES	YES*

585

586 *RMSE: Root Mean Square Error. SM: Silty sand. ML: Silt. CL: Lean Clay*

587 **BOLD: Best performing models for a particular metric**

588 * However, the effective porosity of 0.28 almost exceeds the Farhat et al. (2018)
 589 recommended maximum value of 0.30 for fine sands.

590

591

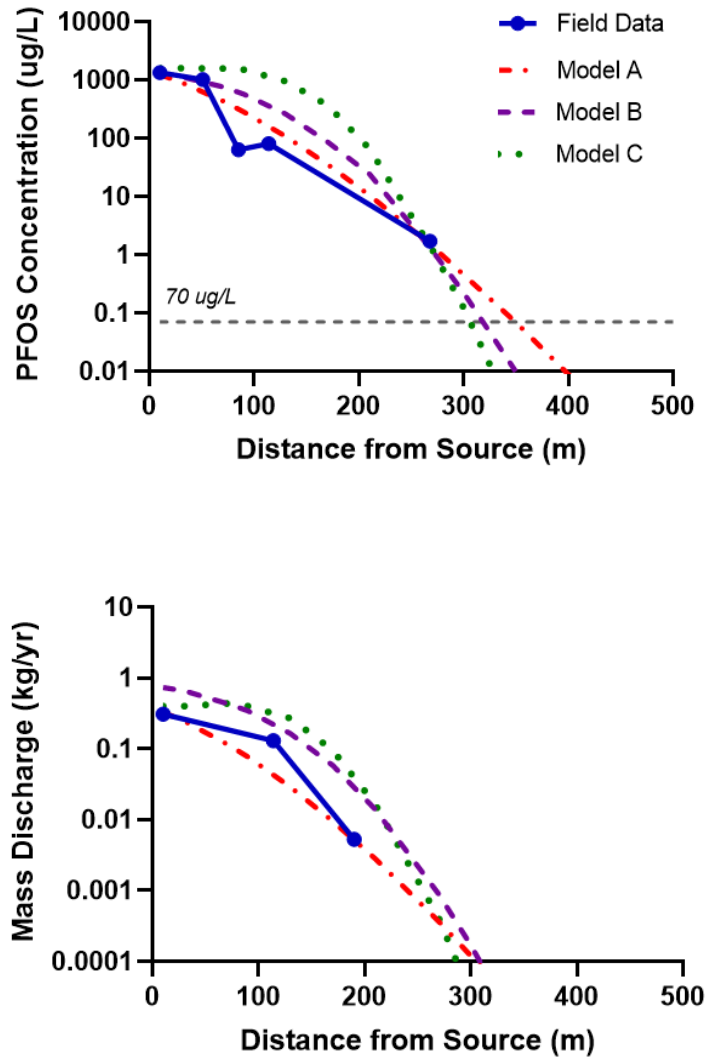
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594

595

596



597 **Figure 6. PFOS Concentration (Top Panel) and Mass Discharge (Bottom Panel) vs.**
598 **Distance from Source (2017)**

599

600 Overall, the correlation of the three key evaluation metrics (concentration, mass
601 discharge, and total mass in the two units), indicates that REMChlor-MD **Model A**
602 with matrix diffusion in low permeability silty sands, silts, and clays was best able to
603 simulate the observed PFOS mass distribution from the high-resolution monitoring
604 program for plume migration to the northeast.

605

606 **Key Processes Evaluated**

607 With the calibrated REMChlor-MD model with matrix diffusion (Model A), a
608 hypothetical exercise to evaluate a possible maximum PFOS plume extent was
609 conducted where the edge of the plume was assumed to be at the 0.07 µg/L
610 (70 ppt) Preliminary Remediation Goal (USEPA, 2019). With this definition of the
611 PFOS plume boundary, the simulated plume was on the order of 350 meters
612 (1,150 feet) long in 2017. This is generally supported by the field observations
613 where relatively high concentrations of PFOS were seen in the far downgradient
614 location (1.67 µg/L in Location 14) about 270 m (890 feet) from the center of the
615 source. However, the entire PFOS plume was not fully delineated in the field, and
616 therefore a comparison to the full extent of the plume could not be confirmed.
617 Overall, the base case REMChlor-MD model was considered to adequately
618 represent the key site characteristics that impact the fate and transport of PFOS at
619 the site and was then used to evaluate several key processes about PFOS
620 migration.

621

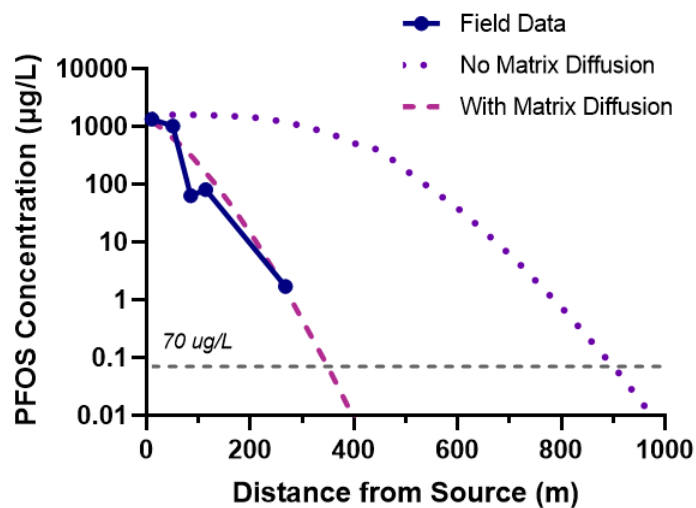
622 *Impact of Matrix Diffusion on Plume Migration*

623 A second simulation of the calibrated Model A was run without matrix diffusion
624 processes (i.e., no diffusion into low-permeability layers) by greatly reducing the
625 diffusion coefficient by 4 orders of magnitude, while all other variables were kept
626 constant. With this approach, the geologic conceptual model is maintained where
627 advection is dominated by the clean sands (SP) (retained in both models) and with
628 no change in the calibrated groundwater seepage velocity, but no matrix diffusion
629 retention is possible for the no-matrix diffusion model.

630

631 At this site, Model A suggested the plume length to the 0.07 ug/L boundary was
632 about 350 meters in 2017 (Figure 7). With no matrix diffusion, the simulated plume
633 length was 910 meters, or 2.6 times longer than the with matrix diffusion case.
634 Overall, the application of the REMChlor-MD model to this field site indicates that
635 matrix diffusion can serve as an important attenuation process with respect to the
636 rate of plume expansion for PFOS. A companion paper (Farhat et al., 2021)
637 explores this matrix diffusion attention process in more detail.

638



639

640 **Figure 7. Simulated Plume Lengths for Model A With and Without Matrix Diffusion in**
641 **2017.**

642

643 Potential Future PFOS Plume Expansion

644 Model A, with matrix diffusion, was then used to project the migration of the PFOS
645 plume in the future. As a non-degrading constituent with relatively strong source,
646 the REMChlor-MD model runs forecasts that the PFOS plume will likely continue to
647 expand slowly, to 420 meters in the year 2040 and 500 meters in the year 2070

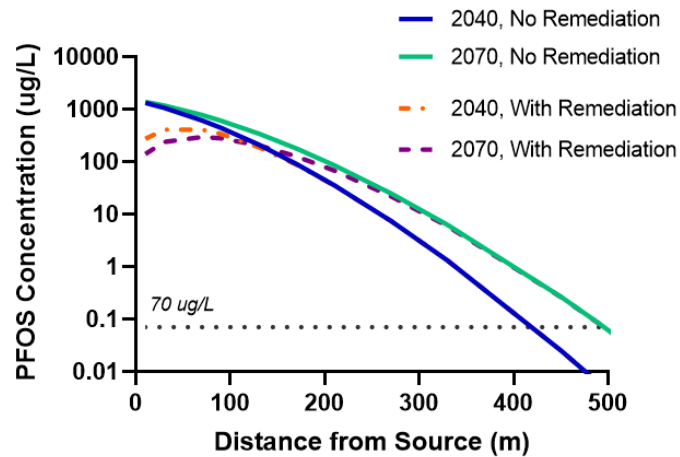
648 (Figure 8 and Table 4). These results suggest that due to the effects of dispersivity
 649 and potentially matrix diffusion, the rate of plume expansion drops significantly over
 650 time as shown in Table 4, from an average 8.8 meters per year during the first 40
 651 years of plume expansion to only 2.7 meters per year during the period 63 to 93
 652 years after the release.

653 **Table 4. Modeled Plume Expansion Rates for Different Intervals, 1977 to 2070**

<i>Interval</i>	<i>Start of Interval</i>	<i>End of Interval</i>	<i>Total Time (years)</i>	<i>Years in Interval (years)</i>	<i>Total Plume Length (m)</i>	<i>Plume Length Over Interval (m)</i>	<i>Plume Expansion Rate (m/year)</i>
1	1977 -	2017	40	40	350	350	8.8
2	2017 -	2040	63	23	420	70	3.0
3	2040 -	2070	93	30	500	80	2.7
Total	1977 -	2070	93	93	500	500	5.4

654

655 Additionally, a hypothetical source remediation project was simulated in the year
 656 2020, where 100% of the source mass was removed. Subsequent predictions of
 657 future plume migration indicated that this hypothetical source remediation would
 658 have no impact on the plume length in the year 2040 or 2070, a finding consistent
 659 with Farhat et al. (2021) modeling results. For non-degrading plumes, source
 660 remediation has little effect on the plume expansion rate (the distance of the leading
 661 edge of the plume from the source) for the modeling scenarios shown in Figure 8.
 662 Some slight change was noticed in near source concentrations in 2040 and 2070
 663 (dashed lines) but even these near-source areas still have elevated concentrations
 664 of PFOS after complete source remediation due to matrix diffusion.



665 **Figure 8. Comparison of PFOS Concentration vs. Distance from Source in the Year**
 666 **2040 and 2070, With and Without Remediation.** Note 100% of source mass removed in
 667 2020.

668

669 **Model Limitations**

670 The REMChlor-MD model and the input data have several limitations that increase
 671 the uncertainty in the model results. While the observed hydrogeologic setting
 672 changes from the source to the downgradient portion of the plume (Figure 1), the
 673 REMChlor-MD model assumes uniform values for groundwater hydraulic
 674 parameters and for the model's heterogeneity parameters. In addition, REMChlor-
 675 MD only allows use of a linear isotherm throughout the model domain; however,
 676 while certain high-concentration portions of the modeling domain may be better
 677 modeled by a Freundlich isotherm. The timing of the source term introducing PFAS
 678 to the plume downgradient of the source is not likely to be much before 1968 but
 679 could be earlier or later than the best estimate of 1977. A different year for the birth
 680 of the plume could change some of the modeling results presented in the paper.

681

682 Additionally, the interpretations of the modeling results are based on the site
683 characterization work done at the site to date. Additional site characterization could
684 change the field data used in the calibration and provide new information about the
685 potential plume length. In addition, modeling of other PFAAs could result in different
686 modeling outcomes. Finally, the hydraulic conductivity data for the two types of
687 sandy media (fine sands and silty sands) were fixed in the model but are only based
688 on two slug tests which have a relatively large range of uncertainty. Overall, the
689 modeling results should not be considered definitive but rather indicate the general
690 style of the key fate and transport processes for PFOS at this site, processes that
691 include a significant impact from matrix diffusion.

692

693 **CONCLUSIONS**

694 The work presented herein illustrates, as with most contaminants, storage and
695 release of PFAS in low permeability zones can be an important groundwater fate
696 and transport process. When the REMChlor-MD model was applied to a well
697 characterized PFAS research site, the pre-calibration model input parameters had
698 to be adjusted only slightly when matrix diffusion was used in the model.

699

700 The modeling work suggested that the definition of what comprises transmissive vs.
701 low-k geologic media in the model is important when using REMChlor-MD to model
702 field sites. Four general soil types were logged during the site characterization
703 project: clean sands, silty sands, silts, and clays. For the purpose of modeling
704 matrix diffusion in the model, the clean sands ($K=2.4 \times 10^{-3}$ cm/sec) was always
705 assumed to be transmissive geologic media, and silts and clays were assumed to
706 be low-k media. The fourth soil type, silty sands ($K=7.1 \times 10^{-5}$ cm/sec, or 34x lower

707 than the clean sands) were modeled first as being low-media (Model A), then as
708 transmissive media (Model B). Model A fit the site data much better in terms of
709 match centerline plume concentrations, mass discharge across three transects, and
710 the fraction of the PFOS mass in defined low-k media. These results suggest that
711 significant matrix diffusion can occur in plumes where there are two contacting
712 sandy soil types, and that low-k media is not confined to only silts and clays.

713

714 At this site, matrix diffusion processes appeared to have reduced the 1977 to 2017
715 plume length to only 350 meters compared to a no-matrix diffusion simulated plume
716 length of 910 meters. This supports the conclusions of Farhat et al., 2021 that
717 indicate that matrix diffusion is an important attenuation process for non-degrading
718 groundwater chemicals such as PFOS.

719

720 With the calibrated REMChlor-MD model, future plume lengths were forecasted for
721 the year 2070, 93 years since the groundwater source started. Using a plume
722 boundary criteria for PFOS of 0.070 ug/L and a U.S. Environmental Protection
723 Agency preliminary remediation goal, the PFOS plume is forecasted to grow from
724 350 meters in 2017 to 500 meters long in the year 2070 or 1.4 times longer than the
725 2017 plume length. The modeling indicates that the plume expansion rate falls
726 significantly over time, from 8.8 meters per year during the first 40 years of plume
727 life to only 2.7 meters per year during the interval from 63 to 93 years of plume life.
728 This is likely due to a combination of dispersion and matrix diffusion processes
729 (Farhat et al. 2021). Because there are no receptors that will be contacted through
730 the year 2070 (about 50 years from now), the modeling forecasts suggested this
731 plume could be managed in-place without the need of a pump and treat system to

732 control migration. However, because of the uncertainty in the modeling results,
733 long-term monitoring would likely be required for part or all of the next 50 years.
734 Finally, a hypothetical source remediation project in the year 2020 was forecasted
735 to have no impact on the forecasted plume length in the year 2040 or 2070, a
736 finding consistent with Farhat et al. (2021) modeling results. Overall, this study
737 highlights the importance of incorporating contaminant storage and release from
738 low-k zones into Conceptual Site Models to quantify risks and select remedies for
739 PFAS in groundwater.

740

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