



**Naval Facilities Engineering Systems Command Southwest
Base Realignment and Closure
Program Management Office West
San Diego, California**

**FINAL
Restoration Advisory Board
Meeting Minutes, Meeting Number 214**

Former Naval Station Treasure Island
San Francisco, California

August 8, 2023

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Prepared for:

**Department of the Navy
Naval Facilities Engineering Systems Command Southwest
BRAC PMO West
33000 Nixie Way, Building 50
San Diego, California 92147**

Prepared by:



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**FINAL
MEETING MINUTES
RESTORATION ADVISORY BOARD
FORMER NAVAL STATION TREASURE ISLAND
8 August 2023**

**Meeting Number 214
Virtual Meeting Number 14**

Community Restoration Advisory Board (RAB) Members in attendance:

Alice Pilram, Dale Smith, John Gee, and Nathan Brennan

Department of the Navy (Navy) and Regulatory Agency RAB Members in attendance:

Dave Clark, Navy, Lead Remedial Project Manager

Janet Lear, Navy

Erica Spinelli, Navy *

Alexander Valentine, San Francisco Bay Regional Water Quality Control Board
(Water Board) *

Peyton Ward, Department of Toxic Substances Control (DTSC)

RAB Support and Consultant Representatives in attendance:

Marsha Maloof, Meeting Facilitator, Maloof & Associates

Christine Niccoli, Court Reporter

Todd Sax, DTSC

Kimberly Walsh, DTSC

Geoff Mordock, FleishmanHillard

Rick Wice, Battelle

Aaron Dalugdug, Audio Visual Support

Campbell Merrifield, Trevet-Bay West Joint Venture (Trevet-Bay West)

Maddison Laeber, Trevet-Bay West

Ricci Delsigne, Trevet-Bay West

Jack Allen, Trevet-Bay West

Public Guests in attendance

Carol Harvey, Journalist

James Pepper, Blogger *

Philippa Frey, Vice President, Treasure Island Museum

Mary McGuire

*Present virtually via Microsoft Teams

Welcome Remarks and Agenda Review

Marsha Maloof (Maloof & Associates), the meeting facilitator, opened the August 8, 2023, hybrid RAB meeting for Former Naval Station Treasure Island (NSTI) held in-person and virtually. Introductions were initiated and the agenda was reviewed ([Attachment A](#)).

Dave Clark (Navy) announced that prior to the meeting the RAB members and regulatory agencies toured NSTI's Sites 6, 7, 12, 14, 21, 24, 27, 32, and YF3; the Fire Training Facility; the total petroleum hydrocarbon (TPH) Arsenic Area; and the Empty Lot Area.

New Business—Environmental Program Overview

Mr. Clark introduced the Environment Program Overview presentation ([Attachment B](#)).

This presentation discusses the current activities at Installation Restoration (IR) Site 12, per- and polyfluoroalkyl substances (PFAS), and Site YF3 as well as progress towards other program objectives including post remedy actions, explanations of significant difference (ESD) and land-use controls (LUC), and the five-year review (FYR) process.

Mr. Clark began his presentation by reviewing the fundamental pillars of the environmental program for NSTI. A major milestone is achieved when a remedy is selected and documented in a record of decision (ROD). The final remedies for Site 12 and sites where PFAS releases may have occurred are currently in progress and a corrective action plan needs to be implemented for Site YF3.

The Navy's Environmental Restoration Program follows the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. When Congress established CERCLA, it did not specify unique cleanup standards for every chemical. Instead, it created a process known as the selection of applicable or relevant and appropriate requirements (ARAR).

ARARs requires legal oversight, and the Department of Defense (DoD) counsel evaluates the legal foundation for why and how to complete a remedy. The Navy and the DoD have been working for several decades to build a template and a framework for ARARs.

The feasibility study (FS) process provides criteria for evaluating remedies. The threshold criteria mandates that the Navy protects human health and the environment and complies with ARARs. Other considerations include cost, implementability, short-term and long-term effectiveness and permanence, and reduction in toxicity, mobility, or volume through treatment. The criteria are modified throughout the FS process for state and community acceptance.

The U.S. Environmental Protection Agency made the policy decision that risks from radionuclide (Rad) exposures at remedial sites should be estimated in the same manner as chemical contaminants. The Navy will continue to use the CERCLA process to evaluate Rad.

At Site 12, the Navy is preparing FS addendum #2, which will evaluate alternatives for the remaining contamination within the Solid Waste Disposal Areas and Central Rubbish Area, also referred to as landfill areas, and the radiological impacted areas across IR Site 12,

that are located outside of 1400 series housing. The potential remedies will range from no action to a corrective action plan to LUCs. Completing the addendum will take approximately two years and the Navy anticipates development of a ROD by 2028 or 2029. Sea level rise will also be considered and re-evaluated in Five-Year Reviews. Anticipated future use will be considered, including construction along the shoreline and inland and geotechnical stabilization. The Empty Lot Area will also be evaluated to remove residual TPH and polycyclic aromatic hydrocarbon contamination.

Mr. Clark discussed the basewide PFAS program activities and document status. The Navy plans to facilitate nearshore sampling and the reactive barrier pilot test for IR Site 6. An initial evaluation will be conducted to determine ambient concentrations before beginning nearshore sampling, because the Navy is precluded from creating remedial goals below a background range. The Navy has undertaken a pilot study to see how effective emerging technologies are at containing and preventing PFAS from infiltrating the Bay. Containment may be considered the presumptive remedy for PFAS.

Mr. Clark reviewed the status of upcoming PFAS-related CERCLA documents. The IR Site 6 PFAS remedial investigation (RI) report is targeted for finalization in October 2023 and planning is underway for the supplemental RI work plan, which will address lateral extent and nearshore contamination. The areas of interest/IR site PFAS site inspection (SI) final document is projected for distribution in September 2023 and planning is in progress for the preliminary RI. The Navy is tracking screening levels, which change frequently.

Three ESD documents and LUC remedial designs (RD) are in progress for Sites 24, 6, and 12. The Navy's final ESD for Site 24 was completed in April 2023 and the Navy's final LUC RD is planned for completion in Spring 2024. The ESD for Site 6 proposed an arsenic remedial goal of 35 microgram per liter in groundwater for construction worker scenario with no new ARARs. The ESD is scheduled to be finalized in November 2023 and the draft LUC RD will be available in December 2023. The completion of the Site 12 ESD and LUC RD are on a similar deliverable schedule. New arsenic remedial goals for the construction worker have also been established for Site 12 because they were not in the original remedy. The final Site 12 ESD is scheduled for completion in November 2023 and the draft LUC RD will be distributed in December 2023.

The focus of the FYR is to evaluate the implementation and performance of the remedy for identified sites. The ESDs and LUC RDs are based on recommendations from the second FYR. IR Sites 6, 12, 21, 24, 27 and 30 will be evaluated during the third FYR.

The FYR process includes document review, site inspection, site interviews, and a remedy protectiveness statement. The Navy is planning to distribute an internal draft third FYR report in 2024, followed by agency review and comments, the Navy's responses to comments (RTC), agency concurrence with RTCs and a revised redline strikeout document by May of 2025, and completion and distribution of the final FYR document by August 2025.

At the November 2023 RAB meeting, the Navy will provide an update on data collection activities for Site 6 residual petroleum and PFAS in the groundwater, and for chlorinated solvents in groundwater at Sites 21 and 24.

Distribution of the 2022 groundwater and soil gas monitoring draft reports are delayed until October 2023. Laboratory backlogs and data validation delays following the pandemic are the part of the reason. Samples to be analyzed for PFAS can only be accepted at a limited number of laboratories, which also contributes to the backlog and delays in the schedule.

The only remaining open Navy petroleum pipeline site is YF3 on Yerba Buena Island. Additional data is currently being collected and a land survey and geophysical study are being conducted to delineate the site's physical boundaries to help evaluate petroleum corrective action options. This will allow the Navy to evaluate if an intrusive evaluation or remedy is necessary.

Remaining work at Site YF3 includes a data gap work plan scheduled for completion in July 2024 and a data gap evaluation report to be completed and distributed in October 2025. The corrective action plan is slated for completion in the fall of 2027.

Mr. Clark opened the floor for questions. John Gee (RAB Member) asked about the significance of the colored outlines on Slide 13 for IR Site 6. Mr. Clark explained that the blue and green outlines represent different sets of reports. The sites outlined in blue are addressed in the bayside preliminary assessment (PA)/SI reports. Site 6, as shown in a green outline, is not part of the basewide PA and was accelerated to the RI phase of the CERCLA process in 2017.

James Pepper (Blogger) stated that Yerba Buena Island had a torpedo room in World War II. When the Navy conducts its evaluation, an assumption should be made that explosives are present.

Philippa Frey (Treasure Island Museum) said the presentation was thorough and informative. She asked for clarification on the status of the remedies. Mr. Clark explained that remedies are in place for at least 30 sites in the environmental program, meaning that the solutions have been selected and implemented. The remedial alternatives yet to be determined are for parts of Site 12 and sites where PFAS releases have been documented or may have occurred.

Carol Harvey (Journalist) asked if institutional controls are part of the Navy's remedy at Site 12. Mr. Clark replied that institutional controls are not part of the remedy at this time.

Ms. Harvey then asked if LUCs are part of the Navy's remedy at Site 12. Mr. Clark replied that LUCs are not part of the remedy, but they could be considered during the FS process.

Ms. Harvey stated that at a recent Treasure Island Development Authority board meeting V. Fei Tsen said that Site 12 is going to be wetlands. She thought it came from the term "limited land use" and asked Mr. Clark to explain. Mr. Clark stated that the Navy cannot predict at this time, the exact future use of the property. The CERCLA process will be followed and an evaluation will be made to determine the best remedies for Site 12, taking into consideration the anticipated future reuse plans provided by TIDA and the property developers.

New Business—BRAC Cleanup Team Update

Peyton Ward (DTSC) shared an update of Base Realignment and Closure (BRAC) Cleanup Team (BCT) activities since the last RAB meeting. She said that the NSTI tour was completed earlier today and thanked Mr. Clark for facilitating the tour. The only ongoing fieldwork is basewide groundwater and soil gas monitoring and the installation of new soil-gas wells at Site 24. Navy and regulatory agency representatives attended BCT meetings on May 17 and June 21, 2023, and a two-day BCT meeting in San Diego on July 25 and 26, 2023.

Ms. Ward said that two Technical Working Groups (TWG) meet monthly. One TWG addresses the process leading to a radiological remedy at Site 12. The focus of its next meeting will be the FS addendum #2. The other TWG met in June 2023 and is focusing on PFAS. The basewide PFAS SI report will be finalized by the PFAS TWG and made available to the public by the end of September 2023.

The DTSC is reviewing the draft Site 6 ROD ESD and will provide comments to the Navy. Site 12 ROD ESD comments were submitted to the Navy in June 2023.

Since the last RAB meeting, the 2023 basewide monitoring work plan was finalized and is now available to the public on EnviroStor. The DTSC provided comments to the Navy on the Site 6 PFAS RI report on July 19 and is expecting RTCs and the draft final report later this month.

The 2023 site management plan was received from the Navy in July and is under review. The plan is scheduled to be final in October 2023.

Alexander Valentine (Water Board), speaking on behalf of Jeff White from the Water Board, agreed that Ms. Ward's update on DTSC activities was accurate and had nothing to add.

Old Business—Community Comments

Nathan Brennan (RAB Member) noted that the meeting minutes cover sheet for May 15, 2023, states "February 7, 2023," instead of the correct meeting date.

Mr. Pepper stated that the Naval Facilities Engineering Systems Command (NAVFAC) has the published training manuals for chemical warfare. He requested that the Navy check NAVFAC's offices worldwide for the training surveys from 1955 to 1983 and suggested that the Navy ask the Army for help cleaning up any contamination at NSTI that may have resulted from chemical warfare training.

Old Business—RAB Meeting Minutes Approval Meeting No. 213

Ms. Maloof asked for comments on the May 2023 RAB meeting minutes.

Ms. Smith stated that the word "was" in the last sentence in the first paragraph on page 2 should be changed to "were."

Ms. Smith recommended ending the sentence in the third paragraph on page 2 with "total petroleum hydrocarbon-contaminated soil from the location of a removed prior underground storage tank."

Ms. Smith added that after the word “determination” in the last sentence on page 2 “of whether or not” should be added and the words “of” and “if” should be deleted.

Alice Pilram (RAB Member) moved that the minutes be accepted as amended. Mr. Gee seconded the motion. The May 2023 meeting minutes were approved.

Action Items from May 2023 RAB Meeting

No action items resulted from the May 2023 RAB meeting.

Co-Chair Announcements, and Future Agenda Items

Mr. Clark noted that the next RAB meeting will be held virtually on November 7, 2023, and includes the Navy’s annual “Look Forward Look Back” presentation.

Adjournment

The meeting adjourned at 8:29 p.m.

Action Items

No new action items were reported.

8 August 2023 RAB Meeting Handouts

- Attachment A: NSTI RAB Meeting No. 214 Agenda
- Attachment B: Environmental Program Overview Presentation

Attachment A. NAVSTA TI RAB Meeting No. 214

Agenda

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ENVIRONMENTAL RESTORATION ADVISORY BOARD MEETING AGENDA

FORMER NAVAL STATION TREASURE ISLAND

Tuesday, 8 August 2023 at 7:00pm at Building 1 on Treasure Island

If you cannot attend in person, join by computer Download the Microsoft Teams App to your desktop, phone, or tablet and use Meeting Link:

[Click here to join the meeting](#)

Meeting ID: 214 930 285 118

Password: 2GBFvz

Or Click or Type in: <https://tinyurl.com/TI-RAB-Aug-2023>

Join by telephone Toll Free: 1-833-258-6146, Enter the meeting ID: 657 593 867#

MEETING NO. 214

I. WELCOME REMARKS AND AGENDA REVIEW

7:00 – 7:05 Welcome, Introductions
Marsha Maloof, Meeting Facilitator

7:05 – 7:10 Meeting Guidelines and Agenda Review
Marsha Maloof, Meeting Facilitator
Alice Pilram, Community Co-Chair

II. NEW BUSINESS

7:10 – 8:00 Environmental Program Overview
David Clark, Lead Remedial Project Manager
Q&A: RAB
Q&A: Community

8:00 – 8:15 Break

8:15 – 8:25 BRAC Cleanup Team Update
Peyton Ward, Department of Toxic Substances Control
Jeff White, Regional Water Board

III. OLD BUSINESS

8:25 – 8:40 Community Comments
Marsha Maloof, Meeting Facilitator
Q&A: RAB
Q&A: Community

8:40 – 8:45 RAB Meeting Minutes Approval Meeting No. 213
David Clark, Lead Remedial Project Manager

8:45 – 8:50 Action Items from May 2023 RAB Meeting
David Clark, Lead Remedial Project Manager

8:50 – 8:55 Co-Chair Announcements and Future Agenda Items
Alice Pilram, Community Co-Chair and David Clark, Lead Remedial Project Manager

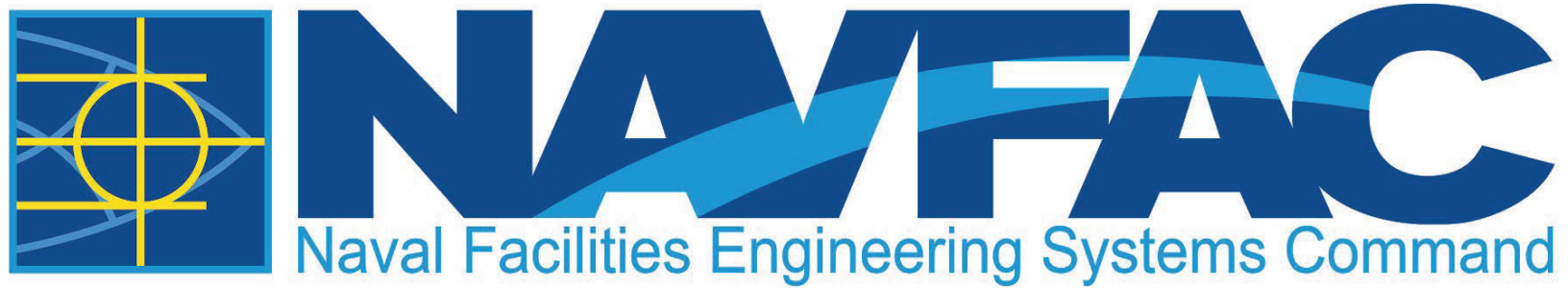
9:00 Adjourn

The Next RAB Meeting will be held virtually on 7 November 2023 at 7:00pm

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Attachment B. Environmental Program Overview Presentation

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Environmental Program Overview

Treasure Island Restoration Advisory Board Meeting

8 August 2023

Presentation Topics

- **Site 12**
- **PFAS Program**
 - (Per and Polyfluoralkyl Substances)
- **Explanations of Significant Difference (ESD) & Land Use Control – Remedial Designs (LUC-RD)**
- **Five Year Review**
- **Petroleum Site YF3**

Site 12



Site 12 Next Steps – Feasibility Study Addendum #2

- Feasibility Study (FS) Addendum (#2) will present an evaluation of *additional* potential remedies for Site 12
 - First remedy implemented per the 2017 Record of Decision
 - The FS Addendum #2 will evaluate alternatives for:
 - Remaining contamination within the Solid Waste Disposal Areas (SWDA's) & Central Rubbish Area (CRA) {aka landfill areas}
 - Radiological impacted areas across IR Site 12 (*outside of 1400 series housing*)
- Request Applicable or Relevant and Appropriate Requirements (ARARs)
 - What are ARARs? (next slide!)

12/7/2022

Applicable or Relevant and Appropriate Requirements (ARARs)

- Congress did not specify cleanup standards in CERCLA
 - (see CERCLA Title 42, Chapter 103, Subchapter I, Section 9621)
- Instead, Congress created *a process* whereby cleanup standards found in other federal and state laws and regulations are applied to a particular CERCLA action.
- This process is known as selection of “applicable or relevant and appropriate requirements” or “ARARs.”
 - A law or regulation is “applicable” if the legal standard would apply independently of CERCLA.
 - Generally, a law or regulation is “relevant and appropriate” if it *can be applied* at the site *even though it is not otherwise legally required*.


12/7/2022

FS Criteria

- Threshold Criteria
 - Overall protection of human health and the environment.
 - Compliance with ARARs.
- Balancing Criteria
 - Long-term Effectiveness and Permanence
 - Reduction in Toxicity, Mobility or Volume Through Treatment
 - Short-term Effectiveness
 - Implementability (technical and administrative)
 - Cost
- Modifying Criteria
 - State Acceptance
 - Community Acceptance

Additional Cleanup Policy

- EPA has made the policy decision that risks from radionuclide exposures at remedial sites should be estimated in the same manner as chemical contaminants
- Navy will continue to use the CERCLA process to evaluate radionuclides.
- As discussed in OSWER Directive 9200.4-18 (U.S. EPA 1997), cleanup levels for radioactive contamination at remedial sites should be established as they would for any chemical and the risks should be characterized in standard Agency risk language consistent with CERCLA guidance for remedial sites.

 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 22 1997

OSWER No. 9200.4-18

MEMORANDUM

SUBJECT: Establishment of Cleanup Levels for CERCLA Sites with Radioactive Contamination

FROM: Stephen D. Luftig, Director *Stephen D. Luftig*
Office of Emergency and Remedial Response

Larry Weinstein, Acting Director *Larry Weinstein*
Office of Radiation and Indoor Air


TO: Addressees

PURPOSE

This memorandum presents clarifying guidance for establishing protective cleanup levels¹ for radioactive contamination at Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) sites. The policies stated in this memorandum are inclusive of all radioactive contaminants of concern at a site including radon.² The directive is limited to providing guidance regarding the protection of human health and does not address levels necessary to protect ecological receptors.

¹This directive provides guidance on cleanup levels expressed as a risk, exposure, or dose level and not as a soil concentration level. The concentration level for various media, such as soil, that corresponds to a given risk level should be determined on a site-specific basis, based on factors such as the assumed land use and the physical characteristics (e.g., important surface features, soils, geology, hydro geology, meteorology, and ecology) at the site. This guidance does not alter the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) expectations regarding treatment of principal threat waste and the use of containment and institutional controls for low level threat waste.

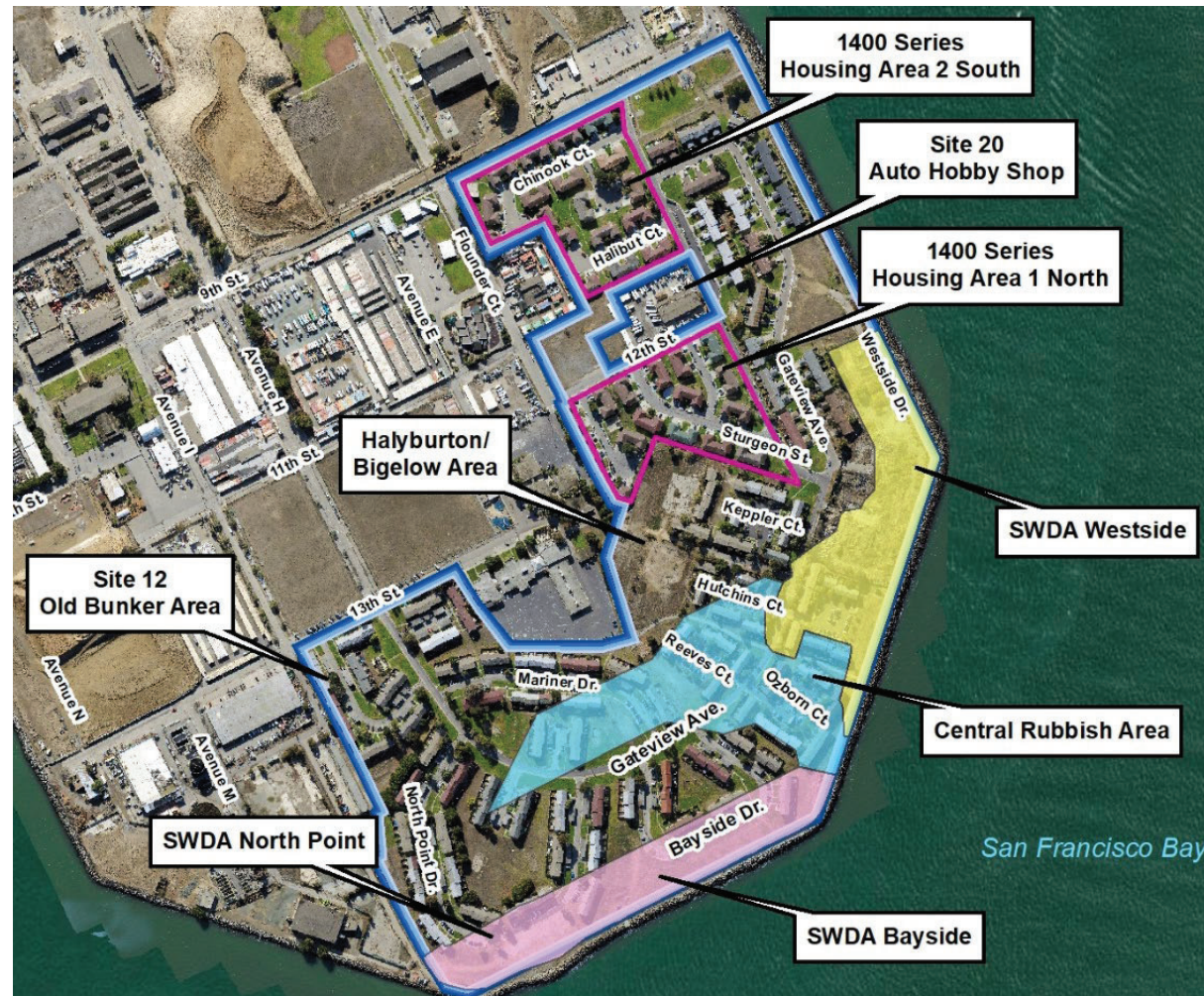
²Since radon is not covered in some Federal radiation regulations it is important to note that the cleanup guidance clarifications in this memorandum include radon. Attachment A is a listing of standards for radionuclides (including radon) that may be applicable or relevant and appropriate requirements (ARARs) for Superfund sites.

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Site 12 Parts At a Glance

- Site consists of several major components
 - Landfill Areas
 - SWDAs and CRA*
 - Areas outside of landfill areas
 - 1400 Series Housing Area

*Solid Waste Disposal Area – Central Rubbish Area



Other Factors for Consideration

- **Sea Level Rise (SLR)**

- Navy will evaluate SLR during development of remedial alternatives
- Navy will continue to monitor remedy relative to SLR
 - Tied to the Five Year Review process

- **Reasonably Anticipated Future Reuse**

- Navy's remedy *is not redevelopment* but (at BRAC bases) takes into account what the property may be used for after transfer
 - May include construction along shoreline and inland
 - May include geotechnical stabilization

Additional Work Ongoing in Support of FS Addendum #2

- **Additional excavation in Site 12, (empty lot area)**
 - Extend previous excavation to remove residual PAH/TPH-contaminated soil



PFAS Program



Planned PFAS Activities

- Establish Background Area to Facilitate Nearshore Sampling
 - Sediment – Porewater – Surface Water
- IR Site 6 PFAS Reactive Barrier Pilot Test



PlumeStop/Liquid Activated Carbon stock

12

Preliminary PFAS CERCLA Document Status

- **Reporting for the *IR Site 6* PFAS RI**
 - Final Document Target Oct 2023
 - Planning Underway for Supplemental RI Workplan
- **Reporting for the AOI/IR (formerly called basewide) PFAS SI**
 - Final Sept 2023
 - Planning for AOI/IR PFAS Preliminary RI
- **Tracking Evolving Guidance/Policy**
 - Screening Values
 - Risk Assessment Guidance
 - Laboratory Analysis



Explanations of Significant Difference (ESD) Land Use Controls Remedial Design (LUC RD)

Site 24 – Dry Cleaning Facility

- **ESD**
 - ESD revised chlorinated solvent soil gas RGs for residential and commercial/industrial workers
 - Final issued April 2023
- **LUC RD**
 - Collect additional soil gas monitoring data (July 2023) – determine if plume extent is bounded
 - Revise area requiring institutional controls if needed (ARIC)
 - Final spring 2024

Site 6 – Fire Fighting Training Facility

- **ESD**

- ROD/Final RAP identified arsenic in groundwater for the future construction worker
- Proposed RG revisions from 250 ug/l to 35 ug/l
- No new ARARs identified
- Final Oct 2023

- **LUC RD**

- Review recent groundwater monitoring data – determine if plume extent is bounded
- If not, expand monitoring well network to delineate new RG
- Revise area requiring institutional controls (ARIC)
 - Draft Nov 2023

Site 12 – Gateview Ave Petroleum Area

- **ESD**

- ROD/Final RAP identified arsenic in groundwater as contaminant for off-site aquatic receptors
- Proposed RG establishment of 35 ug/l for construction worker scenario
- No new ARARs identified
- Final Nov 2023

- **LUC RD**

- Establish an ARIC
- Implement contaminated groundwater management plan to be followed during construction activities
- Evaluate land use controls as needed
- Draft Dec 2023

Treasure Island Five-Year Review

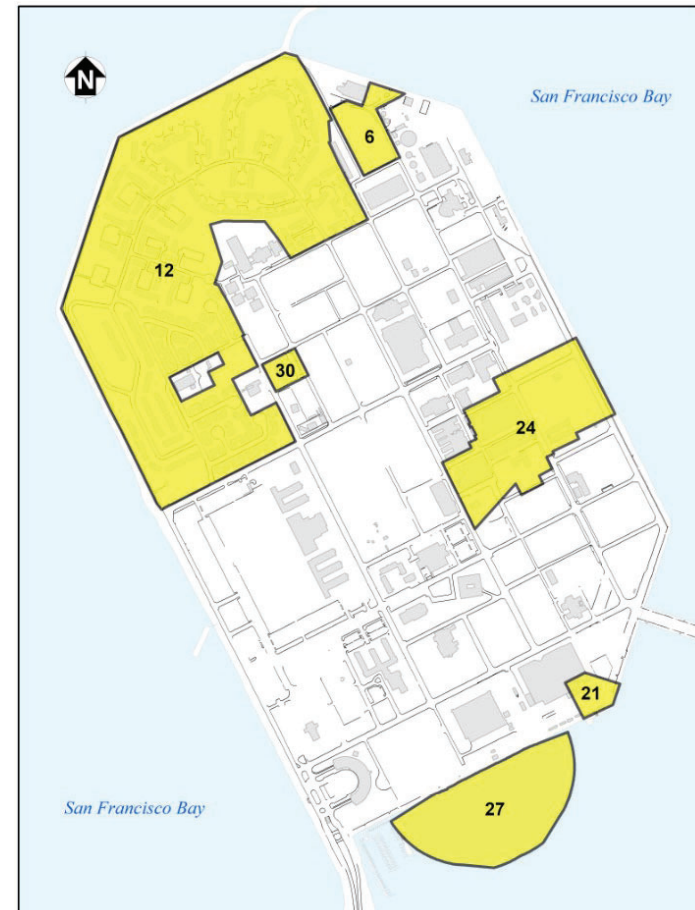
Focus of the Five Year Review

- **To evaluate the implementation and performance of the remedy for subject sites**
 - **Determine whether the remedy is, or will be protective of human health and the environment.**



Five Year Review Sites (2nd & 3rd FYR)

- **Six sites will be evaluated for the 3rd FYR:**
 - IR Sites 6, 12*, 21, 24, 27, and 30
 - *For Site 12, the evaluation will include the remedy for groundwater within the Gateview Arsenic/TPH area, as well as the implemented soil remedy.



Five Year Review Process

Step	Purpose
Document Review	<ul style="list-style-type: none">• Review of records of decision, remedial action designs, work plans, completion and monitoring reports, and annual site inspection reports• Confirm remedial action is working as designed and/or how the remedial action is currently functioning
Site Inspection	<ul style="list-style-type: none">• Document current site conditions to evaluate visual evidence of the protectiveness of the remedies at each site
Site Interviews	<ul style="list-style-type: none">• Complete interviews of cross-section stakeholders to identify any problems or concerns with the remedies that remain to be addressed• Stakeholders include: DTSC, Waterboard, TIDA, residents, and local community members
Protectiveness Statement	<ul style="list-style-type: none">• Establishing if the remedy for each site is protective of human health and the environment

3rd FYR Schedule

- **September 2023 – Contract in Place**
- **2024 – Develop Internal Draft***
- **Early 2025 – Draft Completed**
- **May 2025 – Concurrence on RTCs and RLSO**

*Any new rules or regulations should be provided by early 2024

Groundwater/Soil Gas Monitoring

Groundwater and Soil Gas Monitoring

- **Ongoing Monitoring at 4 sites**
 - Groundwater – Sites 6, 12, and 24
 - Soil Gas – Sites 21 and 24
- **2022 Monitoring Report – Draft October 2023**
 - Delays due to laboratory validation backlog

Petroleum Site YF3



- **Only remaining open Navy petroleum pipeline site**
- **Located on Yerba Buena Island**



Additional Data Collection

- Land surveying and a geophysical study to determine the physical boundaries, including bathymetric and topographical delineation, and to further characterize the depth to bedrock.
- Soil boring and porewater assessments to further define the horizontal and vertical extent of residual petroleum contamination
- Data will be collected and analyzed to supplement the existing site



YF3 Path Forward

- **YF3 Datagap Workplan**
 - July 2024
- **YF3 Datagap Evaluation Report**
 - Oct 2025
- **YF3 NEPA Evaluation**
 - Oct 2026
- **YF3 CAP**
 - Oct 2027
- **YF3 CAP Post Construction Summary Report**
 - Dec 2028

Questions?



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