



PERIODIC REVIEW

**Emerald Kalama Chemical LLC
Facility Site ID#: 1082**

**1296 NW 3rd Street
Kalama, WA**

**Industrial Section
Waste 2 Resources Program**

April 2016

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1.0 Introduction

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup site conditions and monitoring data to ensure that human health and the environment are being protected at the Emerald Kalama Chemical LLC facility (Site) located in Kalama, Washington. Remedial action was undertaken at the Site under Consent Decree No. 082005152 (CD) between Ecology, Goodrich Corporation and Emerald Kalama Chemical LLC. Cleanup of this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

The CD between Ecology, Goodrich Corporation and Emerald Kalama Chemical LLC was effective on March 17, 2008. The CD identifies Goodrich Corporation as the “performing party” until February 28, 2011, and then Emerald Kalama Chemical as the performing party starting March 1, 2011 to implement the Cleanup Action Plan (CAP) approved on October 11, 2004. The CAP called for the remediation of highly contaminated soil areas (former flare stack line and transfer sump) using soil vapor extraction to remove a long-term source of groundwater impacts. The Waterloo Emitter System was installed as an effort to reduce contaminant mass migrating to the existing North Impacted Area (NIA) interception trench which prevents impacted groundwater from migrating to the wetland and the Columbia River. The West Impacted Area (WIA) intermediate sand recovery well system was upgraded and continued operations of the WIA interception trench provided a reduction in contaminant mass and prevented impacted groundwater from reaching the Columbia River.

The MTCA cleanup levels for soil are established under WAC 173-340-740. The MTCA cleanup levels for groundwater are established under WAC 173-340-720. WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a Site every five years under the following conditions:

- (a) Whenever the department conducts a cleanup action.
- (b) Whenever the department approves a cleanup action under an order, agreed order, or consent decree.
- (c) Or, as resources permit, whenever the department issues a no further action opinion, and one of the following conditions exists:
 1. Institutional controls or financial assurance are required as part of the cleanup.
 2. Where the cleanup level is based on a practical quantitation limit.
 3. Where, in the department’s judgment, modifications to the default equations or assumptions using Site-specific information would significantly increase the concentrations of hazardous substances remaining at the Site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

When evaluating whether human health and the environment are being protected, the factors the department shall consider include [WAC 173-340-420(4)]:

- (a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the Site.
- (b) New scientific information for individual hazardous substances of mixtures present at the Site.

- (c) New applicable state and federal laws for hazardous substances present at the Site.
- (d) Current and projected Site use.
- (e) Availability and practicability of higher preference technologies.
- (f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

The department shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

2.0 Summary of Site Conditions

2.1 Site Description and History

Emerald Kalama Chemical LLC (Emerald) is located at 1296 Third Street NW in Kalama, Washington, in Cowlitz County (Photo 1). The Emerald facility is approximately 35 acres in size and is located in the Columbia River Valley in southwestern Washington (Figure 6.1). The facility is located on the east bank of the Columbia River, approximately 1 mile upstream from the confluence of the Columbia and Kalama Rivers. The Columbia River valley is relatively narrow near the site and is occupied by the Columbia River and surrounding flood plains. The flood plain is approximately 1.5 miles wide at the Site, with the river occupying nearly a mile of this width. The valley is surrounded by uplands with moderate to steep slopes.

Kalama Chemical, Inc. purchased the property from Dow Chemical in 1971 and wholly owned and operated it from 1971 to 1986. In 1986, BC Sugar Refinery Ltd. (BC Sugar) acquired less than 50 percent (50%) of Kalama Chemical, Inc. stock. By January 1990, BC Sugar acquired the remaining stock and Kalama Chemical, Inc. was a wholly owned subsidiary. In May 1994, BC Sugar sold all of its stock in Kalama Chemical, Inc. to Freedom Chemical. In March 1998, Kalama Chemical, Inc. was acquired by BF Goodrich and changed its name to BF Goodrich Kalama, Inc. (BFGK). Pursuant to an Asset Purchase Agreement dated November 2000, BF Goodrich sold its Performance Materials business, including BF Goodrich Kalama, Inc., and the Kalama facility subsequently changed its name to Noveon Kalama. In early 2004, Lubrizol acquired the Noveon Kalama facility. In May 2006, Sun Capital purchased several plants from Lubrizol and formed Emerald Performance Materials. American Securities purchased Emerald Performance Materials in 2014. The facility is currently referred to as Emerald Kalama Chemical LLC.

The Emerald facility has historically used and continues to use toluene as the principal raw material to produce benzoic acid and a variety of other products that are derived from toluene. Emerald's products are used as flavorings and preservatives in foods and beverages and as additives in pharmaceuticals, fragrances, surfactants, plasticizers, and other consumer products.

Over the years of its operation, there have been a number of historical releases at the facility. The U.S. Environmental Protection Agency (EPA) and Ecology have conducted inspections of the facility including a Comprehensive Groundwater Monitoring Evaluation and a multimedia inspection. In 1991 BFGK and EPA entered into an Agreed Order pursuant to the Resource Conservation and Recovery Act (RCRA). The 1991 Order required the completion of a RCRA Facility Investigation (RFI), a corrective measures study (CMS), and an interim corrective measures evaluation (ICMA). The RFI work began in 1992 and it was approved by EPA on September 12, 1994. A subsequent Supplemental RFI (SRFI) to address specific data needs and

to provide the basis for assessing final corrective measures was submitted to EPA on December 19, 1997.

In the RFI, the facility was divided into the NIA and the WIA based on distributions of chemicals of concern (COCs) and the direction of groundwater flow. As part of the SRFI, two additional areas were identified: the Central Area (CA) and the East Area. The NIA, WIA and CA are shown on Figure 6.2. Interim corrective measures (ICMs) were designed to address discharges of COCs from the NIA and WIA. The ICMs included an interceptor trench constructed in the NIA to control or reduce discharges from the upper sand aquifer to the wetland. In 1997, a soil vapor extraction (SVE) system, recovery well network, and a shallow interceptor trench were installed as ICMs in the WIA to control discharges to the Columbia River. With the exception of the SVE system, the other ICMs continue to operate.

2.2 Site Investigations and Sample Results

On November 5, 1998, Ecology issued Agreed Order No. DE 98H-S327 with BFGK and Rogers Sugar Ltd. (Rogers), successor by amalgamation to BC Sugar, under the Model Toxics Control Act, and the 1991 RCRA Order with EPA was subsequently terminated on April 25, 1999. Under the Ecology Order, BFGK and Rogers conducted a Remedial Investigation and Feasibility Study (RI/FS) and prepared a Cleanup Action Plan (CAP). Data gaps were identified and field investigations were performed to complete the remedial investigation.

Specific investigations were performed in the following areas: East Area, NIA, Wetland, CA, and WIA. Tidal studies indicated a southward gradient from the NIA in the intermediate sand aquifer and a westward gradient toward the WIA in the intermediate and deep sand aquifers. The East Area had low levels of benzene in groundwater that did not appear to be migrating towards the Columbia River or the wetland (Figure 6.3). Significant impacts were restricted to the upper sand aquifer in the NIA (Figure 6.4).

The CA contained impacted soil in the upper sand soils and groundwater only. The CA investigation indicated releases at the stack flare/stack line, above ground storage tanks, process tanks, loading dock, the API separator/process sewer system, the carbon absorption system, and former dry wells (Figure 6.5). The WIA investigation found releases from the west tank farm and the transfer pump, including releases of toluene and benzene (Figure 6.6).

Soil analytical data from the CA and WIA are shown in Tables 7.1 and 7.2, respectively. The remedial investigation identified COCs in the soil, most prevalently benzene, toluene, biphenyl, bis(2-ethylhexyl)phthalate, and phenol.

Wetland studies, conducted from 1996-1998, concluded that the concentrations of metals in wetland surface water and wetland sediments were remaining constant or declining. All sediment samples were below the MTCA Method A and B values for soil, and surface water samples were below MTCA Method B concentrations. It was concluded that the NIA interception trench prevents impacted groundwater in the NIA from affecting the wetland, which in turn protects the Columbia River.

The distribution of COCs in groundwater were generally found in two contaminant plume areas: a contiguous area encompassing the northern part of the CA and the central NIA and the western WIA.

2.3 Interim Corrective Measures

ICMs were taken to control or reduce impacts to the subsurface in the NIA and WIA. These measures included an NIA Interception Trench (Photo 2) operated from December 1995 to present; a WIA SVE System operated from May 1997 to October 1999; a WIA Shallow Interception Trench operated from November 1997 to present; and WIA Intermediate Sand Recovery Wells operated from April 1997 to present.

The 1,500 foot long NIA interception trench was installed to control and reduce the discharge of COCs from the upper sand aquifer to the wetland. Sampling results show reduced volatile organic compound (VOC) concentrations in the wetland surface water (Photo 3).

The SVE system installed in the WIA (Photo 4) as an ICM was designed to remove contaminant mass from the west tank farm. Approximately 800 pounds of toluene were removed from soil and shallow groundwater in the west tank farm area, resulting in very low levels of toluene remaining. The system was shut down following Ecology approval.

A shallow interceptor trench was installed in the WIA to collect contaminated groundwater to prevent it from discharging to the Columbia River. A review of VOC concentrations in monitoring wells indicated a decrease in contaminant migration to the Columbia River. The WIA Intermediate Sand Recovery Well System (Photo 5) consists of ten recovery wells that contain and reduce the mass of COCs in groundwater. The system continues to operate and has been effective in removing contaminant mass.

2.4 Cleanup Actions

The CAP, approved on October 11, 2004, called for the remediation of highly contaminated soil areas (former flare stack line and transfer sump) using soil vapor extraction to remove a long-term source of groundwater impacts. Paving and other physical barriers were used to enhance the effectiveness of the technology and provide protection to terrestrial resources. The SVE system met the goal of providing source removal from impacted soils in the WIA and CA and was shut down December 2013.

The Waterloo Emitter wells are an in-situ system (Photo 6) that utilizes diffusive tubing for the controlled and uniform release of oxygen. Oxygen diffused out of the tubing is intended to dissolve directly into the groundwater flowing past the emitter, with the goal of enhancing the aerobic biodegradation environment.

Continued operations of the NIA interception trench provided a reduction in contaminant mass and prevented impacted groundwater from migrating to the wetland and the Columbia River. The upgraded WIA intermediate sand recovery well system and continued operations of the WIA interception trench provided a reduction in contaminant mass and prevent impacted groundwater from reaching the Columbia River.

A compliance monitoring program was implemented and institutional controls were put in place to limit or prohibit activities that would interfere with the integrity of the remedy. Fencing and appropriate security was used to limit public access, and a restrictive covenant was recorded at the Cowlitz County Auditor's Office.

2.5 Cleanup Levels

Cleanup levels for this Site are presented in Section 3.3 of this document. The cleanup levels for groundwater were based on protection of surface water. The point of compliance for groundwater is from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the site.

Soil cleanup levels that are protective of groundwater were exceeded for benzene, toluene benzoic acid, biphenyl, phenol and arsenic but were not exceeded for direct contact. The soil point of compliance for protection of groundwater is throughout the site.

Freshwater site-specific cleanup levels were chosen from the literature for benzoic acid, biphenyl, diphenyl oxide, phenol, and toluene. Freshwater cleanup levels for arsenic and copper were based on natural background concentrations in the area.

2.6 Restrictive Covenant

Because contamination remains on site, a restrictive covenant was recorded on April 3, 2008 for the property to prohibit activities that may interfere with the cleanup action or monitoring, and to describe other measures necessary to assure the integrity of the cleanup action and continued protection of human health and the environment. The restrictive covenant is shown in Section 8.0.

3.0 Periodic Review

3.1 Effectiveness of Completed Cleanup Actions

Cleanup actions for the WIA, NIA, and CA were successfully implemented and several of them continue. Based on results from the 2014-2015 Remedial Action Report, the NIA trench system continues to maintain hydraulic control, preventing discharge of VOCs and semi-volatile organic compounds (SVOCs) from the upper sand aquifer to the wetland. The two COCs remaining above cleanup levels, benzene and diphenyl oxide (DPO), show a continuing decrease in concentration (Tables 7.3, 7.4, 7.5).

In the WIA and CA, the SVE system operated from May 2009 to May 2013. Influent concentrations and contaminant removal rates decreased by three to four orders of magnitude since startup, and then became asymptotic (trending toward zero and flat lining). The system effectively removed VOCs from the vadose zone soil for a time. When the SVE system was no longer extracting appreciable amounts of contaminants, it was shut down and decommissioned with Ecology's approval.

A Restrictive Covenant for the Site was recorded and is in place. The Restrictive Covenant prohibits activities that could result in the release of contaminants at the Site without Ecology's approval, and prohibits any use of the property that is inconsistent with the Covenant. The Restrictive Covenant serves to ensure the long term integrity of the remedy.

Based upon the Site visit conducted on February 8, 2016, the cleanup activities for WIA, NIA, and CA continue to eliminate exposure to contaminated soils and groundwater. The SVE system effectively removed contaminant mass. The interceptor trenches continue to maintain hydraulic control so contamination does not reach the wetland or the Columbia River. A photo log is

presented in Section 9.0. Photos 1, 2, and 3 were taken on February 8, 2016. Photos 4, 5, and 6 were taken February 25, 2016.

3.2 New Scientific Information for Individual Hazardous Substances or Mixtures Present at the Site

There is no new scientific information for the contaminants related to the Site.

3.3 New Applicable State and Federal Laws for Hazardous Substances Present at the Site

The cleanup at the Site was governed by WAC 173-340-702(12)(c)[2001 ed.]. This regulation states that:

“A release cleaned up under the cleanup levels determined in (a) or (b) of this subsection shall not be subject to further cleanup action due solely to subsequent amendments to the provision in this chapter on cleanup levels, unless Ecology determines, on a case-by-case basis, that the previous cleanup action is no longer sufficiently protective of human health and the environment.”

Although cleanup levels in groundwater and soil have changed as a result of modifications to MTCA, the contamination remaining at the Site above the new MTCA Method A and B cleanup levels does not pose a threat to human health or the environment. The cleanup action is still considered protective of human health and the environment. Cleanup levels required by the CD and 2015 MTCA values are compared below.

Analyte	CD Soil Cleanup Levels (mg/kg)*	2015 MTCA Method B Soil Cleanup Level (mg/kg)	CD Groundwater Cleanup Level (µg/L)	2015 MTCA Method B Groundwater Cleanup Level (µg/L)
Benzene	0.00676	0.0174	1.2	5
Toluene	14.5	0.273	2,000	640
Benzoic Acid	99	18.4	24,590	64,000
Biphenyl	5.9	125	230	5.47
Bis (2-ethylhexyl) phthalate	4.01	0.668	1.8	6
Diphenyl Oxide	15.2	N/A	410	N/A
Phenol	11.7	0.757	2,560	2,400
Arsenic	6	20 **	51	5
Copper	N/A	14.3	115	640

N/A = Not Applicable

mg/kg – milligrams per kilogram

µg/L – micrograms per liter

* Soil cleanup levels based on protection of groundwater (Method B)

** Based on background

3.4 Current and Projected Site Use

The Site is currently used for industrial purposes. There have been no changes in current or projected future Site or resource uses.

3.5 Availability and Practicability of Higher Preference Technologies

The remedy implemented at this Site included removal and containment of hazardous substances, and it continues to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not considered practicable at this Site.

3.6 Availability of Improved Analytical Techniques to Evaluate Compliance with Cleanup Levels

The analytical methods used at the time of the remedial action were capable of detection below selected Site cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for this Site.

4.0 Conclusions

The following conclusions have been made as a result of this periodic review:

- The cleanup actions completed at the Site still appear to be protective of human health and the environment.
- Cleanup actions for the WIA, NIA, and CA continue to eliminate exposure to contaminated soils and groundwater. The SVE system effectively removed contaminant mass and the interceptor trenches continue to maintain hydraulic control so contamination does not reach the wetland or the Columbia River.
- The cleanup actions have been determined to comply with MTCA cleanup standards.
- Groundwater is monitored on a semi-annual basis at the NIA, CIA, and WIA for chemicals of concern. In 2014, Ecology authorized changes to the groundwater monitoring system including removing wells MW-238 and MW-235 from water quality analysis but continuing to retain them for groundwater elevation monitoring.
- In 2008 the Waterloo Emitter system was installed as an effort to enhance bioremediation through oxygen diffusion to reduce DPO concentrations at the NIA Trench. Ecology is currently evaluating the effectiveness of the emitter system to see if there is a need for continued operation.
- The Restrictive Covenant recorded for the property in 2008 is in place and continues to be effective in protecting human health and the environment from exposure to hazardous substances and in protecting the integrity of the cleanup action.

Based on this periodic review, Ecology has determined that the requirements of the Restrictive Covenant continue to be met. No additional cleanup actions are required by the property owner.

It is the property owner's responsibility to continue implementation of the remedy and to inspect and monitor groundwater at the Site to ensure that the integrity of the remedy is maintained.

4.1 Next Review

The next review of the cleanup actions for Emerald will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required at this Site, the next periodic review will be scheduled five years from the completion of those activities.

5.0 References

Draft Remedial Investigation Revision 1, BF Goodrich Kalama Facility, ThermoRetec Consulting Corporation, October 16, 2000.

Draft Remedial Investigation Revision 2, BF Goodrich Kalama Facility, ThermoRetec Consulting Corporation, December 15, 2000.

Final Feasibility Study, Noveon Kalama, The RETEC Group, Inc., December 23, 2003.

Cleanup Action Plan, The RETEC Group, Inc., June 30, 2004.

2014-2015 Annual Remedial Action Report, RSEC, August 2015.

Ecology Site Visit, February 8, 2016.

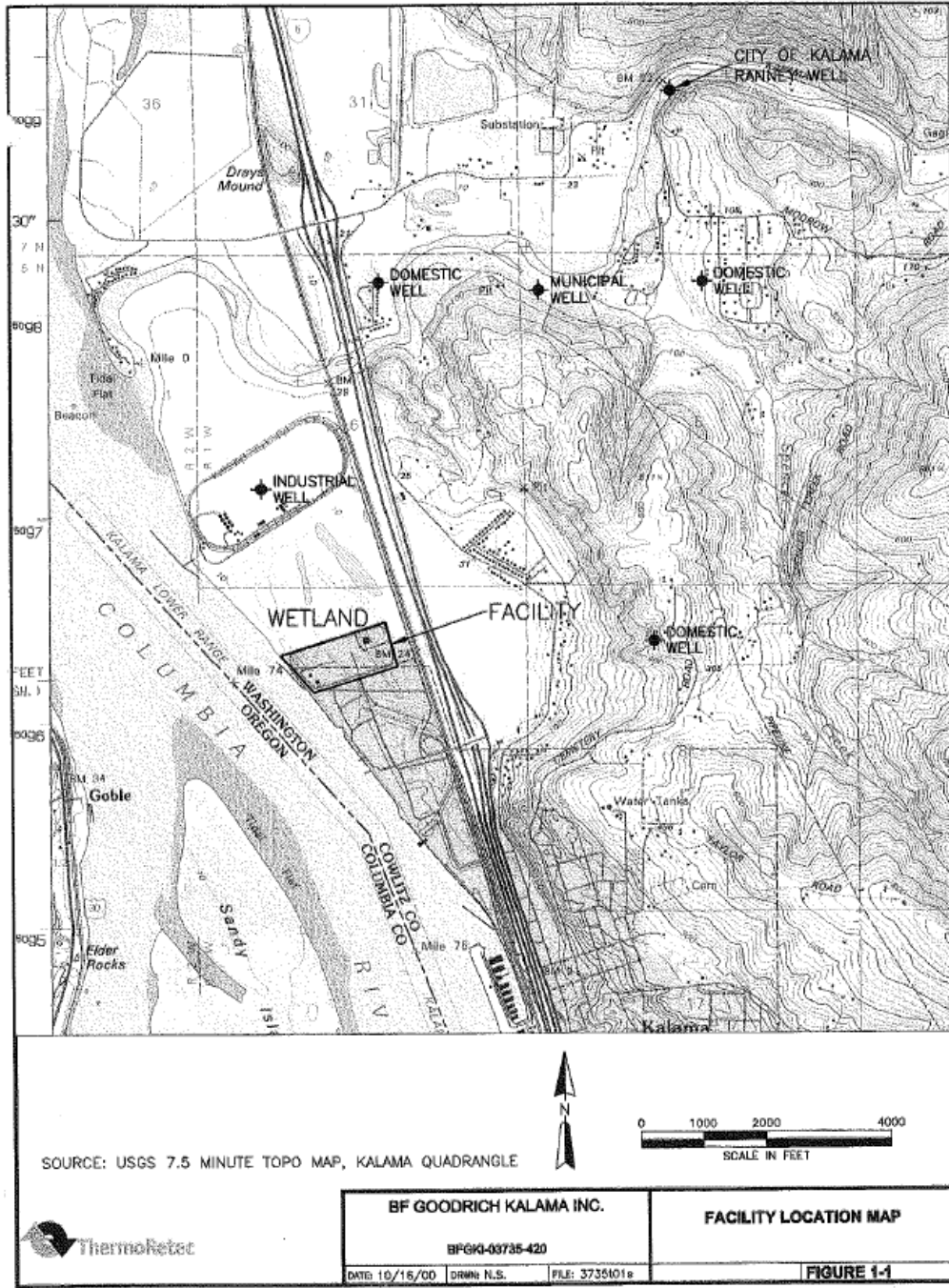
Agreed Order No. DE 98H-S327, November 2008.

Consent Decree No. 082005152, March 17, 2008.

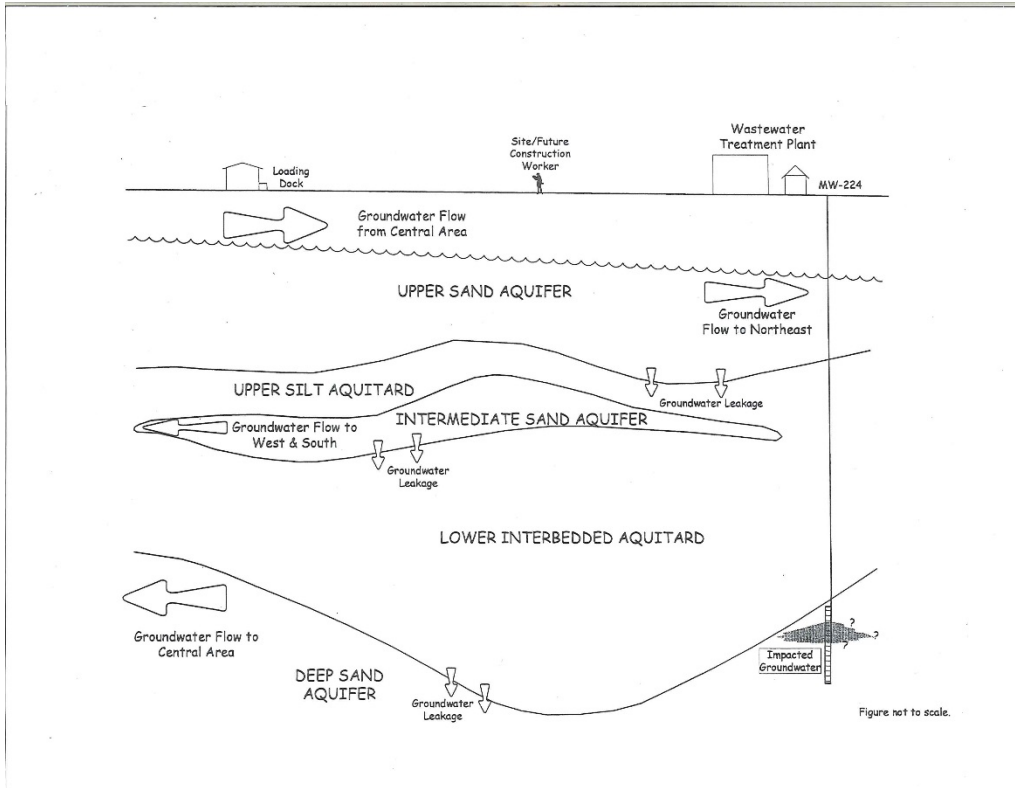
6.0 Figures

6.1 Facility Location Map

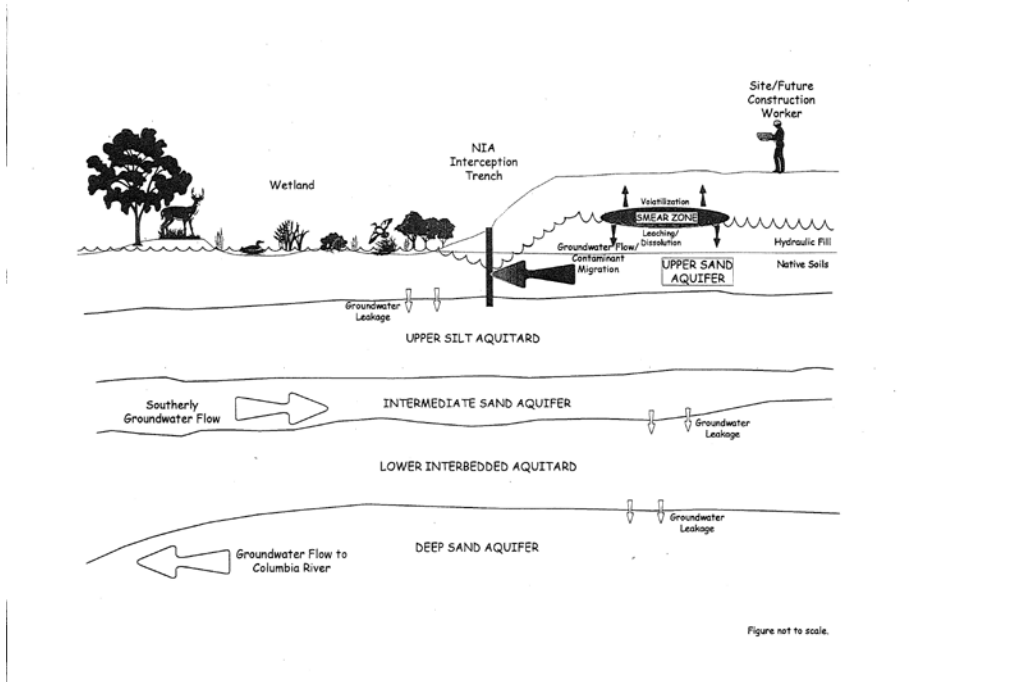
Source: ThermoRetec, October 2000



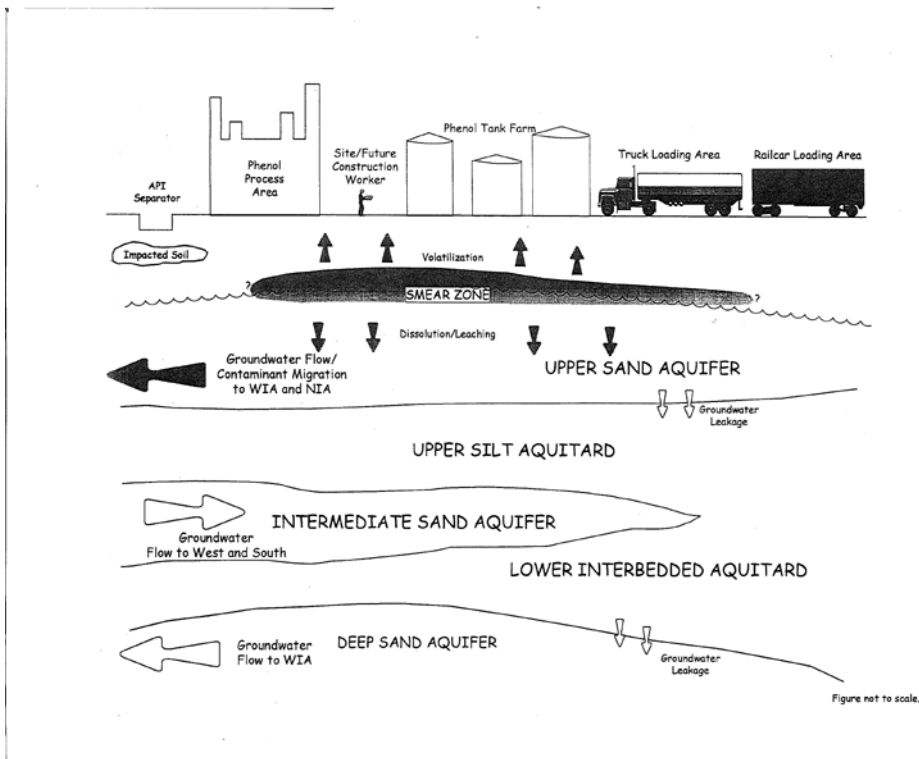
6.3 East Area Conceptual Model
 Source: Remedial Investigation, December 2000



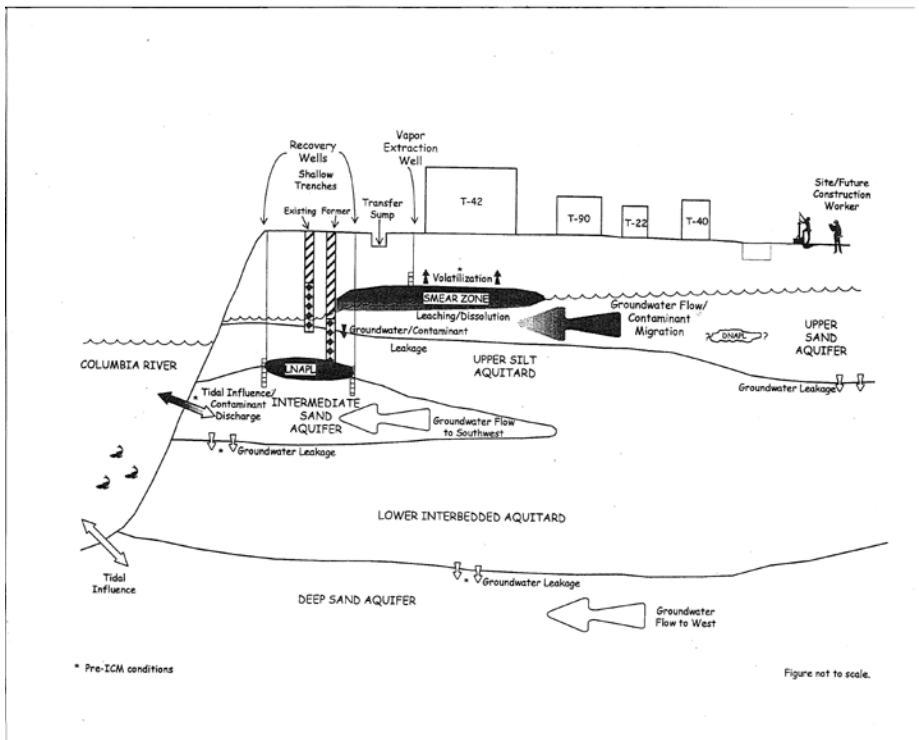
6.4 North Impacted Area Conceptual Model
 Source: Remedial Investigation, December 2000



6.5 Central Area Conceptual Model
 Source: Remedial Investigation, December 2000



6.6 West Impacted Area Conceptual Model
 Source: Remedial Investigation, December 2000



7.0 Tables

7.1 CA Soil Sampling Results

Source: ThermoRetec, December 2000

Sample Location	Sample Date	Sample Depth (feet bgs)	Arsenic (mg/kg)	Benzene (mg/kg)	Benzoic Acid (mg/kg)	Biphenyl (mg/kg)	bis(2-Ethylhexyl) phthalate (mg/kg)	Diphenyl Oxide (mg/kg)	Phenol (mg/kg)	Toluene (mg/kg)
FAS-1	11/13/92	0	NA	< 0.05	NA	NA	NA	2.5	< 0.5	0.2 B
FAS-2	11/13/92	0	NA	0.05	NA	NA	NA	3.3	< 0.5	0.6 B
FAS-2	11/13/92	0.2	0.31 B	< 0.05	5.8 J	< 3.6	< 3.6	6.3	< 3.6	1 J
HW-1	11/10/92	0	NA	< 0.05	NA	NA	NA	3 J	< 0.5	0.6 B
HW-2	11/10/92	0	NA	< 0.05	NA	NA	NA	4 J	< 0.5	0.1 B
HW-3	11/10/92	0	0.88 B	< 0.05	6.5 J	< 3.6	< 3.6	7.6 J	< 3.6	0.9 B
HW-4	11/10/92	0	NA	< 0.05	NA	NA	NA	3.1 J	< 0.5	0.2 B
T-108	11/5/92	0.5	NA	< 0.05	NA	NA	NA	1.9	< 0.5	< 0.1
T-108	11/5/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-108	11/5/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-108	11/5/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-108	11/5/92	10	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	< 0.1 J
T-113	11/10/92	0.5	NA	< 0.05	NA	NA	NA	110	< 0.3	1.9
T-113	11/10/92	2.5	NA	< 0.05	NA	NA	NA	12.6 J	< 0.3	< 0.1
T-113	11/10/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.3	< 0.1
T-113	11/10/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.3	< 0.1
T-113	11/10/92	10	NA	0.29	NA	NA	NA	0.5	1	22
T-115	11/11/92	0.5	NA	0.3	NA	NA	NA	15.7 J	< 0.5	6.2
T-115	11/11/92	2.5	NA	< 0.5	NA	NA	NA	1.8	< 0.5	1
T-115	11/11/92	5	NA	0.16	NA	NA	NA	34	< 0.5	33
T-115	11/11/92	7.5	1.9 B	7.91	76 J	190	< 17	190	< 17	1,900 J
T-115	11/11/92	10	NA	19	NA	NA	NA	120	< 0.5	3,500
T-121	11/17/92	14	NA	< 0.5	NA	NA	NA	6.6	< 0.5	0.3
T-121	11/17/92	15.7	NA	< 0.5	NA	NA	NA	2	< 0.5	0.2
T-123	11/17/92	0.5	NA	< 0.5 J	NA	NA	NA	0.8 J	< 0.5	1 J
T-123	11/17/92	2.5	1.6 B	4.73	830	180	< 93	570	65 J	300
T-123	11/17/92	5	NA	0.07	NA	NA	NA	6.6	4.3	2.9
T-123	11/17/92	7.5	NA	0.96	NA	NA	NA	10.5	6.7	120
T-123	11/17/92	10	0.42 B	140	95	11	< 7.3	22	9.4	8,300
T-137	11/19/92	0.5	NA	< 0.05	NA	NA	NA	13.8	< 0.5	1.9
T-137	11/19/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-137	11/19/92	5	NA	< 0.05	NA	NA	NA	1.2	< 0.5	< 0.1
T-137R	12/9/92	0.5	NA	< 0.05	NA	NA	NA	78	< 0.5	0.5
T-137R	12/9/92	2.5	NA	< 0.05	NA	NA	NA	0.8	< 0.5	0.1 B
T-137R	12/9/92	5	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	< 0.1 J
T-137R	12/9/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-137R	12/9/92	10	NA	0.05 J	NA	NA	NA	< 0.5	< 0.5	0.1 BJ
T-141	11/20/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2
T-141	11/20/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-141	11/20/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-141	11/20/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-141	11/20/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-142	11/23/92	0.5	NA	< 0.05	NA	NA	NA	0.9	< 0.5	< 0.1
T-142	11/23/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-142	11/23/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-142	11/23/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.6
T-142	11/23/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-142	11/23/92	11.2	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1

Sample Location	Sample Date	Sample Depth (feet bgs)	Arsenic (mg/kg)	Benzene (mg/kg)	Benzoic Acid (mg/kg)	Biphenyl (mg/kg)	bis(2-Ethylhexyl) phthalate (mg/kg)	Diphenyl Oxide (mg/kg)	Phenol (mg/kg)	Toluene (mg/kg)
T-143	11/23/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	1.7
T-143	11/23/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1
T-143	11/23/92	6	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.4 B
T-143	11/23/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.5 B
T-143	11/23/92	10	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	0.1 BJ
T-145	11/23/92	0.5	NA	< 0.05	NA	NA	NA	10.9	< 0.5	< 0.1
T-145	11/23/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-145	11/23/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-145	11/23/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-145	11/23/92	9.5	1.3	< 0.05	< 85	< 17	< 17	20.2	< 17	0.4
T-147	11/24/92	0.5	NA	< 0.05	NA	NA	NA	14.7	0.8	2.2
T-147	11/24/92	2.5	NA	< 0.05	NA	NA	NA	0.7	< 0.5	0.2
T-147	11/24/92	5	NA	21 J	NA	NA	NA	440	11	1,800 J
T-147	11/24/92	7.5	0.63	26 J	< 86	790	< 17	550	< 17	2,100 J
T-147	11/24/92	10	NA	27 J	NA	NA	NA	560	3.7	1,600 J
T-148	11/25/92	0.5	NA	< 0.05	NA	NA	NA	21	< 0.5	0.5 B
T-148	11/25/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.5 B
T-148	11/25/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.5 B
T-148	11/25/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.6 B
T-148	11/25/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.6 B
T-149	11/24/92	0.5	NA	0.08	NA	NA	NA	84	0.8	0.2 B
T-149	11/24/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-149	11/24/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-149	11/24/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-149	11/24/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-150	11/25/92	0.5	NA	< 0.05	NA	NA	NA	15.5	< 0.5	0.6 B
T-150	11/25/92	2.5	NA	< 0.05	NA	NA	NA	34	< 0.5	0.6 B
T-150R	12/8/92	0.5	NA	0.06	NA	NA	NA	1.9	< 0.5	< 0.1
T-150R	12/8/92	2.5	NA	< 0.05	NA	NA	NA	0.8	< 0.5	< 0.1
T-150R	12/8/92	7	NA	0.08	NA	NA	NA	380	0.6	10.3
T-150R	12/8/92	7.5	0.57 B	< 0.05	< 170	410	< 35	NA	< 35	2.6 J
T-151	11/30/92	0.5	NA	0.22	NA	NA	NA	1.9	< 0.5	6.7
T-151	11/30/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2
T-151	11/30/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-151	11/30/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-151	11/30/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2
T-152	11/30/92	0.5	NA	< 0.05	NA	NA	NA	140	1.2	1.9
T-152	11/30/92	2.5	NA	< 0.05	NA	NA	NA	27	< 0.5	0.5
T-152	11/30/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2
T-152	11/30/92	7.5	NA	19 J	NA	NA	NA	530	< 0.5	3,900 J
T-152	11/30/92	10	NA	72 J	NA	NA	NA	1,900	< 0.5	5,800 J
T-153	11/30/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-153	11/30/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-153	11/30/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-153	11/30/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-153	11/30/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-155	12/1/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-155	12/1/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.5 B
T-155	12/1/92	5	0.58 B	< 0.05	< 1.7	NA	< 0.34	< 0.5	< 0.5	0.3 B
T-155	12/1/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-155	12/1/92	10	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	0.2 BJ

Sample Location	Sample Date	Sample Depth (feet bgs)	Arsenic (mg/kg)	Benzene (mg/kg)	Benzolc Acid (mg/kg)	Blphenyl (mg/kg)	bis(2-Ethylhexyl) phthalate (mg/kg)	Diphenyl Oxide (mg/kg)	Phenol (mg/kg)	Toluene (mg/kg)
T-157	12/2/92	0.5	NA	< 0.05	NA	NA	NA	2.1	< 0.5	0.3 B
T-157	12/2/92	2.5	NA	0.15	NA	NA	NA	< 0.5	< 0.5	1.1 B
T-157	12/2/92	5	NA	3.4	NA	NA	NA	710	< 0.5	180
T-157	12/2/92	7.5	1.2 B	55	< 88 J	3,800	< 18	6,800 J	< 18	7,200 J
T-159	12/2/92	0.5	NA	< 0.05	NA	NA	NA	2	< 0.5	0.2 B
T-159	12/2/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-159	12/2/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-159	12/2/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-159	12/2/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.4 B
T-165	12/3/92	0.5	NA	< 0.05	NA	NA	NA	2	< 0.5	0.4
T-165	12/3/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.8
T-165	12/3/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-165	12/3/92	7.5	NA	0.05 J	NA	NA	NA	< 0.5	< 0.5	0.1 J
T-165	12/3/92	10	0.74 B	0.08	< 9.7	2	< 1.9	< 0.5	< 1.9	1.5
T-167	12/3/92	0.5	NA	0.07 B	NA	NA	NA	50 J	< 0.5 J	2 B
T-167	12/3/92	2.5	NA	1.72	NA	NA	NA	240 J	< 0.5 J	4.7 B
T-167	12/3/92	5	NA	0.2 B	NA	NA	NA	5.9	< 0.5	4.5 B
T-167	12/3/92	7.5	0.45 B	19	< 88	1,300	< 18	3,000 J	< 18	92 J
T-167	12/3/92	10	NA	0.85	NA	NA	NA	790	3.4	94
T-169	12/4/92	0.5	NA	0.15	NA	NA	NA	1.3	< 0.5	4.9
T-169	12/4/92	2.5	NA	0.17	NA	NA	NA	3.5	< 0.5	6.1
T-169R	12/16/92	0.5	NA	0.55	NA	NA	NA	3.1	< 0.5	8.5
T-169R	12/16/92	2.5	NA	0.15	NA	NA	NA	1.4	< 0.5	5.3
T-169R	12/16/92	5	NA	0.06	NA	NA	NA	40 J	< 0.5	2.8
T-169R	12/16/92	7.5	0.75 B	18	< 980	1,000	< 200	1,700 J	< 200	1,100 J
T-169R	12/16/92	10	NA	58 J	NA	NA	NA	2,000	0.9 J	600 J
T-170	12/4/92	0.5	NA	0.18	NA	NA	NA	900 J	< 0.5	4.5
T-170	12/4/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-170	12/4/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-170	12/4/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-170	12/4/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-178	12/9/92	0.5	NA	< 0.05	NA	NA	NA	0.9	< 0.5	0.2 B
T-178	12/9/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-178	12/9/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-178	12/9/92	7.5	1.5 B	120	< 530	930	< 100	480	< 100	100,000 J
T-179	12/9/92	0.5	NA	< 0.05	NA	NA	NA	20	< 0.5	0.2 B
T-179	12/9/92	2.5	NA	< 0.05	NA	NA	NA	3	< 0.5	0.1 B
T-179	12/9/92	5	0.67 B	< 0.05	< 1.8	NA	< 0.36	< 0.5	< 0.5	3.4
T-179	12/9/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-179	12/9/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-183	12/10/92	0.5	29.8	< 0.05	< 20 J	< 4 J	1.2 J	< 0.5 J	< 3.9 J	78
T-183	12/10/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.4 B
T-183	12/10/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-183	12/10/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-183	12/10/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-185	12/10/92	0.5	NA	< 0.05	NA	NA	NA	3.7	< 0.5	1.2 B
T-185	12/10/92	2.5	NA	< 0.05	NA	NA	NA	2	< 0.5	< 0.1
T-185	12/10/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-185	12/10/92	7.5	NA	0.05	NA	NA	NA	370	< 0.5	0.2 B
T-185	12/10/92	10	NA	0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B

Sample Location	Sample Date	Sample Depth (feet bgs)	Arsenic (mg/kg)	Benzene (mg/kg)	Benzolc Acid (mg/kg)	Biphenyl (mg/kg)	bis(2-Ethylhexyl) phthalate (mg/kg)	Diphenyl Oxide (mg/kg)	Phenol (mg/kg)	Toluene (mg/kg)
T-186	12/12/92	0.5	NA	0.06	NA	NA	NA	1.9	< 0.5	1.4
T-186	12/12/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1
T-186	12/12/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1
T-186	12/12/92	7.5	0.55 B	< 0.5	< 2	NA	< 0.4	< 0.5	< 0.5	1
T-187	12/10/92	0.5	NA	< 0.05	NA	NA	NA	63	< 0.5	0.6
T-187	12/10/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.5
T-187	12/10/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2
T-187	12/10/92	7.5	0.42 B	< 0.24	< 1.5	NA	< 0.3	< 0.5	< 0.5	3.1
T-187	12/10/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	1
T-188	12/12/92	0.5	NA	< 0.05	NA	NA	NA	2	< 0.5	0.1
T-188	12/12/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-188	12/12/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1
T-188	12/12/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-189	12/11/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-189	12/11/92	2.5	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	0.2 J
T-189	12/11/92	5	1 B	0.06	< 2 J	J	< 0.4 J	< 0.5 J	< 0.5 J	0.6
T-189	12/11/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.7
T-189	12/11/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1
T-190	12/13/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-190	12/13/92	2.5	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	0.1 J
T-190	12/13/92	6	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	0.1 J
T-190	12/13/92	7.5	NA	0.06 J	NA	NA	NA	< 0.5	< 0.5	1.1 J
T-191	12/12/92	0.5	NA	< 0.05	NA	NA	NA	1.8	< 0.5	0.3
T-191	12/12/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1
T-191	12/12/92	5	NA	< 0.05	NA	NA	NA	3.8	< 0.5	0.6
T-191	12/12/92	7.5	NA	5.63 J	NA	NA	NA	83	4.7	680 J
T-191	12/12/92	10	0.49 B	5.76 J	< 100	35	< 20	36	< 20	460 J
T-192	12/13/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-192	12/13/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-192	12/13/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-192	12/13/92	7.5	0.64 B	0.12	< 99	29	< 20	9	< 20	22
T-193	12/12/92	0.5	NA	< 0.05	NA	NA	NA	2.8	< 0.5	0.3
T-193	12/12/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.7
T-193	12/12/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2
T-193	12/12/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.4
T-193	12/12/92	10	NA	0.11	NA	NA	NA	< 0.5	< 0.5	3
T-194	12/13/92	0.5	NA	< 0.05 J	NA	NA	NA	< 0.5	0.6	< 0.1 J
T-194	12/13/92	2.5	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	< 0.1 J
T-194	12/13/92	5	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	< 0.1 J
T-194	12/13/92	7.5	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	< 0.1 J
T-194	12/13/92	10	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	0.1 J
T-195	12/13/92	0.5	NA	< 0.05	NA	NA	NA	2.9	< 0.5	< 0.1
T-195	12/13/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-195	12/13/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-195	12/13/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-195	12/13/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-197	12/16/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-197	12/16/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-197	12/16/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-197	12/16/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-197	12/16/92	10	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	0.2 B)

Sample Location	Sample Date	Sample Depth (feet bgs)	Arsenic (mg/kg)	Benzene (mg/kg)	Benzoic Acid (mg/kg)	Biphenyl (mg/kg)	bis(2-Ethylhexyl) phthalate (mg/kg)	Diphenyl Oxide (mg/kg)	Phenol (mg/kg)	Toluene (mg/kg)
T-199	12/16/92	0.5	NA	< 0.05	NA	NA	NA	1.3 J	< 0.5	0.5 B
T-199	12/16/92	2.5	NA	< 0.05	NA	NA	NA	2.2 J	< 0.5	0.8
T-199	12/16/92	5	NA	< 0.05	NA	NA	NA	1.3 J	< 0.5	0.2 B
T-199	12/16/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-199	12/16/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-302	12/17/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-302	12/17/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-302	12/17/92	5	0.57 B	< 0.05	< 2	NA	< 0.4	< 0.5	< 0.5	0.4 B
T-302	12/17/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-306	12/21/92	0.5	NA	< 0.05	NA	NA	NA	10.4	< 0.5	< 0.1
T-306	12/21/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-306	12/21/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-306	12/21/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-306	12/21/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-308	12/21/92	0.5	NA	< 0.05	NA	NA	NA	100 J	1.7	0.2 B
T-308	12/21/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-308	12/21/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-308	12/21/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-308	12/21/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-310	12/22/92	0.5	NA	3.25	NA	NA	NA	870	96	21.2
T-310	12/22/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	1.2 B
T-310	12/22/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	1.2 B
T-310	12/22/92	7.5	NA	0.05	NA	NA	NA	< 0.5	< 0.5	2.9 B
T-310	12/22/92	10	NA	< 0.05	NA	NA	NA	0.5	< 0.5	< 0.1
T-312	12/22/92	0.5	NA	< 0.05	NA	NA	NA	9.8	< 0.5	< 0.1
T-312	12/22/92	2.5	NA	< 0.05	NA	NA	NA	2.2	< 0.5	0.2 B
T-312	12/22/92	5	NA	< 0.05	NA	NA	NA	2.4	< 0.5	0.2 B
T-312	12/22/92	7.5	NA	< 0.05	NA	NA	NA	3.5	< 0.5	0.2 B
T-312	12/22/92	10	NA	< 0.05	NA	NA	NA	3.6	< 0.5	0.1 B
T-317	12/28/92	0.5	NA	0.12 B	NA	NA	NA	1.6	< 0.5	1.2 B
T-317	12/28/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-317	12/28/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-317	12/28/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-317	12/28/92	10	0.24 B	< 0.05 J	< 2	NA	< 0.39	< 0.5	< 0.5	< 0.1 J
T-318	12/29/92	0.5	NA	< 0.05	NA	NA	NA	280	2.5	0.2 B
T-318	12/29/92	2.5	NA	< 0.05	NA	NA	NA	59	< 0.5	< 0.1
T-318	12/29/92	5	NA	< 0.05	NA	NA	NA	2.4	< 0.5	< 0.1
T-318	12/29/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-319	12/29/92	0.5	NA	< 0.05	NA	NA	NA	6.5	< 0.5	< 0.1
T-319	12/29/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	1 B
T-319	12/29/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-319	12/29/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-320	12/29/92	0.5	NA	< 0.05	NA	NA	NA	54	0.5	1.3 B
T-320	12/29/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	1 B
T-320	12/29/92	5	1.7 B	< 0.05 J	< 1.8	NA	0.18 J	< 0.5	< 0.5	1.8 BJ
T-320	12/29/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-321	12/29/92	0.5	NA	< 0.05	NA	NA	NA	8.9	< 0.5	< 0.1
T-321	12/29/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-321	12/29/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-321	12/29/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-321	12/29/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.8 B

Sample Location	Sample Date	Sample Depth (feet bgs)	Arsenic (mg/kg)	Benzene (mg/kg)	Benzolc Acid (mg/kg)	Biphenyl (mg/kg)	bis(2-Ethylhexyl) phthalate (mg/kg)	Diphenyl Oxide (mg/kg)	Phenol (mg/kg)	Toluene (mg/kg)
T-322	12/30/92		NA	25	NA	NA	NA	1,100	1.8	49
T-322	12/30/92	0.5	1.9 B	< 0.05	430 J	420	< 370	960	< 370	1 B
T-322	12/30/92	2.5	NA	< 0.05	NA	NA	NA	1	< 0.5	< 0.1
T-322	12/30/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	1.3 B
T-322	12/30/92	10	NA	0.65	NA	NA	NA	35	1	65
T-323	12/30/92	0.5	NA	< 0.05	NA	NA	NA	31	< 0.5	1.6
T-323	12/30/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-323	12/30/92	5	NA	< 0.05	NA	NA	NA	1.7	< 0.5	0.5 B
T-323	12/30/92	7.5	NA	< 0.05	NA	NA	NA	0.6	< 0.5	0.6 B
T-323	12/30/92	10	NA	< 0.05	NA	NA	NA	2.2	< 0.5	0.4 B
T-324	12/30/92	0.5	NA	0.08	NA	NA	NA	300	1.3	2
T-324	12/30/92	2.5	1 B	0.13	< 450	160	< 90	880	< 90	6.6
T-324	12/30/92	5	NA	< 0.05	NA	NA	NA	51	< 0.5	2.5
T-324	12/30/92	7.5	NA	< 0.05	NA	NA	NA	45	< 0.5	25
T-324	12/30/92	10	0.54 B	29	< 530	190	< 110	480 J	< 110	2,100
T-325	12/30/92	0.5	NA	0.16 B	NA	NA	NA	< 0.5	< 0.5	2.6 B
T-325	12/30/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.5 B
T-325	12/30/92	5	NA	0.05 B	NA	NA	NA	< 0.5	< 0.5	1.7 B
T-325	12/30/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-325	12/30/92	10	NA	< 0.05	NA	NA	NA	NA	NA	0.1 B
T-326	1/4/93	0.5	NA	0.27	NA	NA	NA	330 J	44 J	2
T-326	1/4/93	2.5	0.66 B	20	< 1.8	NA	< 0.36	680 J	41 J	360
T-326	1/4/93	5	NA	1.8	NA	NA	NA	17.9 J	5.3 J	51
T-326	1/4/93	7.5	NA	0.24	NA	NA	NA	6.4 J	0.6 J	5.1
T-326	1/4/93	10	NA	5.19	NA	NA	NA	5.9	4.3	28 J
T-327	1/4/93	0.5	NA	< 0.05	NA	NA	NA	530	< 0.5	0.2 B
T-327	1/4/93	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-327	1/4/93	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-327	1/4/93	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.9
T-327	1/4/93	10	NA	< 0.05	NA	NA	NA	0.8	0.7	< 0.1
T-328	1/5/93	0.5	NA	0.06	NA	NA	NA	1	< 0.5	2.7
T-328	1/5/93	2.5	NA	0.07	NA	NA	NA	< 0.5	< 0.5	2.1
T-328	1/5/93	5	0.4 B	0.1	< 1.7	NA	< 0.33	< 0.5	< 0.5	3.1
T-328	1/5/93	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-328	1/5/93	16	NA	0.2	NA	NA	NA	4.2 J	0.9	6.8
T-329	1/5/93	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-329	1/5/93	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-329	1/5/93	5	1.4 B	< 0.05	< 1.8	NA	< 0.36	< 0.5	< 0.5	0.2 B
T-329	1/5/93	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-329	1/5/93	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.9 B
T-332	1/11/93	0.5	NA	< 0.05	NA	NA	NA	2 J	< 0.5	0.2 B
T-332	1/11/93	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-332	1/11/93	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-332	1/11/93	6.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-333	1/11/93	0.5	NA	< 0.05	NA	NA	NA	3.4	< 0.5	0.1 B
T-333	1/11/93	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-333	1/11/93	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-334	1/11/93	0.5	NA	< 0.05	NA	NA	NA	24	< 0.5	0.2 B
T-334	1/11/93	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-334	1/11/93	5	0.52 B	0.15 B	< 90 UR	< 18 UR	< 18 UR	< 0.5 UR	< 18 UR	4 B

Sample Location	Sample Date	Sample Depth (feet bgs)	Arsenic (mg/kg)	Benzene (mg/kg)	Benzoic Acid (mg/kg)	Biphenyl (mg/kg)	bis(2-Ethylhexyl) phthalate (mg/kg)	Diphenyl Oxide (mg/kg)	Phenol (mg/kg)	Toluene (mg/kg)
T-335	1/11/93	0.5	NA	< 0.05	NA	NA	NA	2.2	< 0.5	0.2 B
T-335	1/11/93	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-336	1/12/93	0.5	NA	< 0.08	NA	NA	NA	5.7	< 0.5	0.3 B
T-336	1/12/93	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-337	1/12/93	0.5	NA	< 0.05	NA	NA	NA	3.2	< 0.5	0.9
T-337	1/12/93	2.5	NA	< 0.05	NA	NA	NA	0.5	< 0.5	0.3 B
T-337	1/12/93	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-338	1/12/93	0.5	NA	< 0.05	NA	NA	NA	4.2	< 0.5	1.2 B
T-338	1/12/93	2.5	0.62 B	< 0.05	< 940 UR	< 180 UR	< 180 UR	< 0.5 UR	< 180 UR	0.4 B
T-339	1/12/93	0.5	NA	< 0.05	NA	NA	NA	0.6	< 0.5	0.2 B
T-339	1/12/93	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-340	3/22/93	0.5	0.97 B	0.55	13 J	7	< 3.5	69	4.1	21
T-340	3/22/93	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-340	3/22/93	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-340	3/22/93	7.5	NA	< 0.05	NA	NA	NA	0.7	< 0.5	0.3 B
T-340	3/22/93	10	NA	0.23	NA	NA	NA	2.2	< 0.5	1.6 B
T-341	3/22/93	0.5	NA	0.08	NA	NA	NA	69	0.5	1.5 B
T-341	3/22/93	2.5	NA	< 0.05	NA	NA	NA	22,000	< 0.5	3.2
T-341	3/22/93	5	0.5 B	0.54	< 9	1,300	< 1.8	6,000	< 1.8	140
T-341	3/22/93	7.5	NA	0.42	NA	NA	NA	5,700	< 0.5	110
T-341	3/22/93	10	NA	0.42	NA	NA	NA	1,400	< 0.5	50
T-342	3/22/93	0.5	NA	< 0.05	NA	NA	NA	1.9	< 0.5	< 0.1
T-342	3/22/93	2.5	NA	< 0.05	NA	NA	NA	0.7	< 0.5	< 0.1
T-342	3/22/93	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-342	3/22/93	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-342	3/22/93	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-343	3/23/93	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-343	3/23/93	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-343	3/23/93	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-343	3/23/93	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-343	3/23/93	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B

Notes:

- Detected values are bold.
- B - Found in associated method blank.
- J - Estimated value.
- NA - Not analyzed.
- R - Value is rejected.
- U - Not detected; the associated value is the quantitation limit.

7.2 WIA Soil Sampling Results

Source: ThermoRetec, December 2000

Sample Location	Sample Date	Sample Depth (feet bgs)	Arsenic (mg/kg)	Benzene (mg/kg)	Benzoic Acid (mg/kg)	Biphenyl (mg/kg)	bis(2-Ethylhexyl) phthalate (mg/kg)	Diphenyl Oxide (mg/kg)	Phenol (mg/kg)	Toluene (mg/kg)
B-1	09/10/96	15	NA	0.076	NA	NA	NA	NA	NA	0.34
B-1	09/10/96	16.5	NA	2.2	NA	NA	NA	NA	NA	51
B-1	09/10/96	18.5	NA	< 70	NA	NA	NA	NA	NA	990
B-1	09/10/96	20.75	NA	1.7	NA	NA	NA	NA	NA	69
B-1	09/10/96	26.5	NA	< 0.71	NA	NA	NA	NA	NA	18
B-1	09/10/96	39.5	NA	< 0.06	NA	NA	NA	NA	NA	< 0.06
B-2	09/11/96	15	NA	< 0.07	NA	NA	NA	NA	NA	< 0.07
B-2	09/11/96	17.5	NA	< 0.07	NA	NA	NA	NA	NA	< 0.07
B-2	09/11/96	20.5	NA	< 0.061	NA	NA	NA	NA	NA	0.1
B-2	09/11/96	22	NA	< 0.067	NA	NA	NA	NA	NA	< 0.067
B-2	09/11/96	29	NA	< 0.05	NA	NA	NA	2.5	< 0.5	0.2
B-2	09/11/96	25	NA	0.05	NA	NA	NA	3.3	< 0.5	0.6
B-3	09/11/96	17.75	NA	< 0.05	5.8	< 3.6	< 3.6	6.3	< 3.6	1
B-3	09/11/96	19	NA	< 0.05	< 11	< 2.3	< 2.3	< 2.3	< 2.3	< 1
B-3	09/11/96	20	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
B-3	09/11/96	27.5	NA	< 0.05	< 1.9	< 3.8	< 3.8	< 0.5	< 3.8	< 0.6
B-4	09/11/96	10.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
B-4	09/11/96	17.5	NA	< 0.05	< 1.8	< 0.35	< 0.35	< 0.5	< 0.5	< 0.1
B-4	09/11/96	24.25	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
B-5	09/11/96	12	NA	< 0.05	< 1.7	< 0.35	< 0.35	< 0.5	< 0.5	< 0.1
B-5	09/11/96	24	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
HA-4	09/12/96	3.5	NA	< 0.74	NA	NA	NA	NA	NA	70
HA-4	09/12/96	8.5	NA	< 0.68	NA	NA	NA	NA	NA	32
HA-4	09/12/96	12	NA	< 0.67	NA	NA	NA	NA	NA	75
HA-4	09/12/96	15	NA	0.76	NA	NA	NA	NA	NA	71
ISRW-2	02/19/97	14	NA	< 1.5	NA	NA	NA	NA	NA	270
ISRW-2	02/19/97	20	NA	< 1.3	NA	NA	NA	NA	NA	700
ISRW-2	02/19/97	24	NA	< 1.2	NA	NA	NA	NA	NA	280
ISRW-5	02/14/97	17	NA	0.1	NA	NA	NA	NA	NA	100 J
MW-247	09/09/96	15.5	NA	< 0.7	NA	NA	NA	NA	NA	6.7
MW-247	09/09/96	17.5	NA	5.5	NA	NA	NA	NA	NA	0.082
MW-247	09/09/96	21.25	NA	6.3	NA	NA	NA	NA	NA	0.076
MW-247	09/09/96	23	NA	< 0.063	NA	NA	NA	NA	NA	< 0.063
MW-248	09/09/96	16	NA	< 77	NA	NA	NA	NA	NA	360
MW-248	09/09/96	18.5	NA	< 66	NA	NA	NA	NA	NA	2400
MW-248	09/09/96	19	NA	< 620	NA	NA	NA	NA	NA	20000
MW-248	09/09/96	21	NA	< 63	NA	NA	NA	NA	NA	8200
MW-250	02/13/97	17	NA	< 0.071	NA	NA	NA	NA	NA	0.27 J
T-104	11/03/92	0.5	NA	< 0.05	NA	NA	NA	1.3	< 0.5	< 0.1
T-104	11/03/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1 J
T-104	11/03/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-104	11/03/92	7.5	NA	0.21	NA	NA	NA	6.1	< 0.5	8
T-104	11/03/92	10	2.2 B	48	< 2.1	1	0.3 J	6.3	< 0.5	1700
T-104	11/03/92	11.5	NA	1.03	NA	NA	NA	28	< 0.5	41
T-106	11/04/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-106	11/04/92	2.5	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	0.4
T-106	11/04/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-106	11/04/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-106	11/04/92	9.6	NA	< 0.05 J	NA	NA	NA	< 0.5	< 0.5	< 0.1 J
T-106	11/04/92	12.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-109	11/05/92	0.5	NA	< 0.05	NA	NA	NA	< 3	< 0.5	< 0.1
T-109	11/05/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-109	11/05/92	4.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-109	11/05/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-109	11/05/92	10.5	1.3 B	< 0.05	< 1.8	3	< 0.37	8.2	< 0.5	5.5
T-109	11/05/92	12.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1

Sample Location	Sample Date	Sample Depth (feet bgs)	Arsenic (mg/kg)	Benzene (mg/kg)	Benzoic Acid (mg/kg)	Biphenyl (mg/kg)	bis(2-Ethylhexyl) phthalate (mg/kg)	Diphenyl Oxide (mg/kg)	Phenol (mg/kg)	Toluene (mg/kg)
T-111	11/09/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-111	11/09/92	2.5	NA	< 0.05	NA	NA	NA	27	< 0.5	< 0.1
T-111	11/09/92	5	NA	< 0.05	NA	NA	NA	28	< 0.5	65
T-111	11/09/92	7.5	NA	< 0.05	NA	NA	NA	15.9	< 0.5	18
T-111	11/09/92	10	NA	< 0.05	NA	NA	NA	1.9	< 0.5	3.1
T-111	11/09/92	12.5	NA	< 0.05	30	NA	NA	1.3	< 0.5	13000
T-118	11/12/92	11.5	1.1 B	< 0.5	8.7	1	< 0.4	16.7	0.7	0.3 B
T-118	11/12/92	13.6	NA	0.07	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-118	11/12/92	15.6	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-119	11/13/92	12.5	NA	< 0.05	NA	NA	NA	1.8	< 0.5	< 0.1
T-119	11/13/92	14.8	NA	0.23	NA	NA	NA	8.3	< 0.5	< 0.1
T-120	11/13/92	9.7	NA	0.06	NA	NA	NA	1.5	< 0.5	0.1 B
T-120	11/13/92	11.7	NA	0.14	NA	NA	NA	1	< 0.5	0.1 B
T-122	11/16/92	0.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2
T-122	11/16/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-122	11/16/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-122	11/16/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-122	11/16/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-125	11/18/92	0.5	NA	< 0.05	NA	NA	NA	3.3	< 0.5	0.2 B
T-125	11/18/92	2.5	0.85 B	2.36	20	420	< 1.7 J	920	0.59 J	4.6 J
T-125	11/18/92	5	NA	0.42	NA	NA	NA	220	< 0.5	260
T-125	11/18/92	7.5	0.41 B	8.13	< 440	640	< 89	610	< 89	3700
T-125	11/18/92	10	NA	1.91 J	NA	NA	NA	6	< 0.5	110 J
T-127	11/18/92	0.5	NA	< 0.05	NA	NA	NA	2.5 J	< 0.5	0.4 B
T-127	11/18/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.8 B
T-127	11/18/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-127	11/18/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-127	11/18/92	10	NA	< 0.05	NA	NA	NA	1	< 0.5	0.2 B
T-129	11/18/92	0.5	1.9 B	< 0.05	3 J	< 4	< 3.6	4.6 J	< 3.6	0.4
T-129	11/18/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-129	11/18/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-129	11/18/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1
T-129	11/18/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2
T-131	11/19/92	0.5	NA	0.3	NA	NA	NA	0.8 J	< 0.5	< 1
T-131	11/19/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1
T-131	11/19/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-131	11/19/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-131	11/19/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-133	11/19/92	7.5	1.9 B	< 0.05	< 1.9	NA	< 0.38	< 0.5	< 0.5	0.2
T-133	11/19/92	0.5	NA	< 0.05	NA	NA	NA	0.9	< 0.5	< 0.1
T-133	11/19/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-133	11/19/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-133	11/19/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-135	11/19/92	0.5	NA	< 0.05	NA	NA	NA	2.3	< 0.5	0.3
T-135	11/19/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1
T-135	11/19/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2
T-135	11/19/92	7.5	1.7 B	< 0.05	< 1.9	NA	< 0.39	< 0.5	< 0.5	0.7
T-135	11/19/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-138	11/20/92	0.5	NA	< 0.05	NA	NA	NA	1.9	< 0.5	0.7
T-138	11/20/92	2.5	NA	< 0.05	NA	NA	NA	1.5	< 0.5	< 0.1
T-138	11/20/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-138R	12/08/92	0.5	NA	< 0.05	NA	NA	NA	24	< 0.5	0.2 B
T-138R	12/08/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-138R	12/08/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-139	11/20/92	10	2.1 B	< 0.5	< 2.2	15	< 0.13	7.6	< 0.5	2800 J
T-139	11/20/92	0.5	NA	< 0.05	NA	NA	NA	3.8	< 0.5	< 0.1
T-139	11/20/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-139	11/20/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-139	11/20/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1

Sample Location	Sample Date	Sample Depth (feet bgs)	Arsenic (mg/kg)	Benzene (mg/kg)	Benzoic Acid (mg/kg)	Biphenyl (mg/kg)	bis(2-Ethylhexyl) phthalate (mg/kg)	Diphenyl Oxide (mg/kg)	Phenol (mg/kg)	Toluene (mg/kg)
T-161	12/01/92	0.5	NA	< 0.05	NA	NA	NA	0.6 J	< 0.5	1.2
T-161	12/01/92	2.5	0.66	0.1	< 2	NA	< 0.39	< 0.5	< 0.5	3.9
T-161	12/01/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.7 B
T-161	12/01/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2
T-161	12/01/92	10	NA	< 0.05	NA	NA	NA	0.7	< 0.5	0.1
T-162	12/02/92	0.5	NA	0.11	NA	NA	NA	< 0.5	< 0.5	2.3 B
T-162	12/02/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.5 B
T-162	12/02/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-162	12/02/92	7.5	NA	0.05	NA	NA	NA	< 0.5	< 0.5	1 B
T-162	12/02/92	10	NA	0.05 J	NA	NA	NA	3.8	< 0.5	0.1 J
T-163	12/07/92	0.5	NA	< 0.05	NA	NA	NA	7.1	< 0.5	0.1
T-163	12/07/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3
T-163	12/07/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-163	12/07/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1
T-163	12/07/92	10	NA	0.37	NA	NA	NA	38	< 0.5	0.7
T-303	12/18/92	0.5	NA	< 0.05	NA	NA	NA	9	< 0.5	0.2 B
T-303	12/18/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-303	12/18/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-303	12/18/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-303	12/18/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-304	12/18/92	0.5	NA	< 0.05	NA	NA	NA	11.7	< 0.5	0.6 B
T-304	12/18/92	2.5	NA	NA	NA	NA	NA	< 0.5	< 0.5	
T-304	12/18/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.1 B
T-304	12/18/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	< 0.1
T-304	12/18/92	10	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-313	12/23/92	0.5	NA	< 0.05	NA	NA	NA	0.6	< 0.5	0.3 B
T-313	12/23/92	2.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-313	12/23/92	5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-313	12/23/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.3 B
T-314	12/23/92	0.5	NA	< 0.05	NA	NA	NA	14.5	< 0.5	0.2 B
T-314	12/23/92	2.5	NA	< 0.05	NA	NA	NA	28 J	< 0.5	0.2 B
T-314	12/23/92	5	NA	< 0.05	NA	NA	NA	22 J	< 0.5	0.3 B
T-314	12/23/92	7.5	NA	< 0.05	NA	NA	NA	< 0.5	< 0.5	0.2 B
T-315	12/28/92	0.5	NA	< 0.05	NA	NA	NA	69	< 0.5	0.3 B
T-315	12/28/92	2.5	1.5 B	< 0.05 J	31 J	< 19	< 19	88	< 19	0.1 J
T-315	12/28/92	5	NA	< 0.05	NA	NA	NA	220	< 0.5	0.1 B
T-315	12/28/92	7.5	NA	< 0.05	NA	NA	NA	0.8	< 0.5	0.1 B
VE-1-1	06/19/96	5	1.1	< 0.054	< 0.72 J	< 0.07	0.1	0.29	< 0.14	< 0.054
VE-1-1	06/19/96	7.5	1.1	< 0.058	< 0.78 J	0.2	< 0.078	1.1	< 0.16	< 0.058
VE-1-2	06/19/96	7	1.2	< 0.054	< 0.7 J	3.6	0.26	17	0.2	< 0.054
VE-1-2	06/19/96	9.5	1.2	0.076	< 0.83 J	25	< 0.083	150	< 0.17	< 0.065
VE-1-3	06/19/96	5	1.6	< 0.055	< 0.74 J	0.46	< 0.074	0.94	< 0.15	0.076
VE-1-3	06/19/96	7.5	2	< 0.061	< 0.8 J	2.3	< 0.08	5.2	< 0.16	< 0.061
VE-1-4	06/19/96	5	0.7	< 0.054	< 0.71 J	< 0.07	< 0.071	0.12	< 0.14	< 0.054
VE-1-4	06/19/96	10	1.2	0.22	3	9.7	< 0.084	38	2.3	30
VE-42-1	06/19/96	5	1.1	< 0.053	< 0.72	< 0.07	< 0.072	< 0.072	< 0.14	2
VE-42-1	06/19/96	7.5	1.6	< 0.056	< 0.75 J	< 0.08	< 0.075	0.14	< 0.15	3.2
VE-42-2	06/18/96	10	4.4	2.2	< 0.9 J	5.3 J	1.7 J	25 J	0.25 J	130
VE-42-3	06/18/96	5	1	< 0.055	< 0.68 J	< 0.07 J	0.71 J	0.28 J	< 0.14 J	0.059
VE-42-3	06/18/96	10	2.4	0.068	< 0.85 J	0.96 J	0.48 J	13 J	< 0.17 J	0.079
VE-42-4	06/18/96	5	1.9	0.056	< 0.74 J	0.24 J	0.54 J	1.1 J	< 0.16 J	0.076
VE-42-4	06/18/96	10	2	< 0.061	< 0.82 J	< 0.08	0.29 J	0.42 J	< 0.16 J	< 0.061

Notes:

- Detected values are bold.
- B - Found in associated method blank.
- J - Estimated value.
- NA - Not analyzed.
- R - Value is rejected.
- U - Not detected; the associated value is the quantitation limit.

7.3 NIA Groundwater Monitoring Results
Source: ThermoRetec, December 2000

Well	Date	VOCs (µg/L) (EPA Method 8021B/8260)		SVOCs (µg/L) (EPA Method 8270C SIM)					Oxygen (mg/L)
		Benzene	Toluene	Benzoic Acid	Biphenyl	Bis (2-ethylhexyl) phthalate	Diphenyl Oxide	Phenol	
		1.2	2,000	24,590	230	1.8	410	2,560	
KC-9	10/22/2009	28	1.7	< 9.5 J	1300	< 0.95	5,400	21	0.43
	4/23/2010	5	< 1.0	< 9.0 J	170	< 0.98	730	7.4	1.72
	10/21/2010	14	< 1.0	< 9.6	840	< 0.96	3,600	18	NA
	10/10/2011	10	< 1.0	< 9.3	420	< 2.4	1,900	21	0.15
	4/18/2012	3.6	< 1.0	< 9.5	150	< 0.93	600	8.7	4.3
	11/8/2012	2.2	< 1.0	< 9.5 UJ	170	< 0.95	1,000	10	0.92
	4/10/2013	3.7	< 1.0	11	110	< 0.95	810	5.1	1.63
	10/16/2013	4.3	< 1.0	< 9.5 UJ	99	< 0.95	1,300	6.6	0.83
	4/15/2014	2.8	< 1.0	< 9.5	51	< 0.95	740	6.4	2.21
	10/21/2014	Inaccessible due to construction; not sampled							
4/21/2015	5.8	< 0.44	5.4 J	150	1.2 JB	1300	9.4 J	NA	
MW-210	10/20/2009	51	< 1.0	< 9.6 J	74	< 0.96	1,800	19	0.36
	4/22/2010	23	< 1.0	< 10 J	79	< 1.0	820	27	0.64
	10/21/2010	22	< 1.0	< 9.8	39	< 0.98	1,700	17	NA
	10/10/2011	7.7	< 1.0	< 9.3	100	< 2.4	1,400	11	0.30
	4/18/2012	16	< 1.0	9.6	150	< 0.93	990	40	2.45
	11/8/2012	5.7	< 1.0	< 9.5 UJ	21	< 0.95	850	4.8	2.59
	4/11/2013	1.5	< 1.0	< 9.5	10	< 0.95	580	4.9	0.89
	10/15/2013	< 1.0	< 1.0	< 9.9 UJ	< 0.99	< 0.99	250	7.6	0.90
	4/16/2014	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	490	< 1.9	2.56
	10/23/2014	< 0.060	< 0.11	< 0.39 H	< 0.095 H	< 0.26 H	590 H	1.2 JH	0.67
4/22/2015	< 0.42	< 0.44	< 0.39	< 0.095	1.2 JB	330	2.2 J	0.62	
MW-232	10/22/2009	< 1.0	< 1.0	< 9.7 J	< 0.97	< 0.97	280	7.3	NA
	4/22/2010	< 1.0	< 1.0	< 10 J	< 1.0	< 1.0	220	9.2	NA
	10/20/2010	< 1.0	< 1.0	< 9.6	< 0.96	< 0.96	260	3.5	NA
	10/10/2011	< 1.0	< 1.0	< 9.3	< 0.93	< 0.93	190 J	10 J	0.16
	4/19/2012	< 1.0	< 1.0	< 9.5	< 0.95	< 2.4	110	3.3	0.53
	11/8/2012	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	200	7.0	0.28
	4/10/2013	< 1.0	< 1.0	11	< 0.95	1.9	160	6.7	1.46
	10/15/2013	< 1.0	< 1.0	< 10 UJ	< 1.0	< 1.0	130	23	0.63
	4/16/2014	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	140	8.3	0.20
	10/21/2014	< 0.06	NA	NA	NA	< 0.26	92	NA	0.88
4/21/2015	< 0.42	NA	NA	NA	1.3 JB	190	NA	0.00	
MW-245	10/25/2007	4.4	< 1.0	< 10 UJ	< 1.0	< 1.0	870	18	0.17
	4/17/2008	3.2	< 1.0	< 9.6 UJ	< 0.96	< 0.96	1,600	23	NA
	10/24/2008	< 1	< 1.0	NA	< 0.98	< 0.98	700	17	NA
	4/20/2009	< 1.0	< 1.0	< 9.6 J	< 0.96	< 0.96	770	12	NA
	10/22/2009	< 1.0	< 1.0	< 9.6 J	< 0.96	< 0.96	400	7.3	NA
	4/22/2010	< 1.0	< 1.0	< 9.0 J	< 0.99	< 0.99	470	14	NA
	10/21/2010	< 1.0	< 1.0	< 10	< 1.0	< 1.0	320	15	NA
	10/10/2011	< 1.0	< 1.0	< 9.3	< 0.93	< 0.93	330 J	12 J	0.17
	4/19/2012	< 1.0	< 1.0	< 9.5	< 0.95	< 2.4	350	8.3	3.16
	11/7/2012	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	180	2.1	0.32
	4/10/2013	< 1.0	< 1.0	< 9.6	< 0.96	< 0.96	260	7.5	0.22
	10/16/2013	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	150	5.7	0.41
	4/15/2014	< 1.0	< 1.0	< 9.5	< 0.95	21	130	3.0	0.78
	10/21/2014	< 0.06	NA	NA	NA	< 0.26	140	NA	0.49
4/21/2015	< 0.42	NA	NA	NA	1.1 JB	200	NA	0.00	
MW-256	10/25/2007	< 1.0	< 1.0	< 11 UJ	< 1.1	< 1.1	200	6.6	0.2
	4/17/2008	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	120	1.9	NA
	10/28/2008	< 1.0	< 1.0	17 J	< 0.95	< 0.95	150	4.7	NA
	4/20/2009	< 1.0	< 1.0	< 9.6 J	< 0.96	< 0.96	47	< 2	NA
	10/22/2009	< 1.0	< 1.0	< 9.5 J	< 0.95	< 0.95	22	< 1.9	NA
	4/22/2010	< 1.0	< 1.0	< 9.0 J	< 0.95	< 0.95	28	< 1.0	NA
	10/21/2010	< 1.0	< 1.0	< 9.9	< 0.99	< 0.99	25	< 2.0	NA
	10/10/2011	< 1.0	< 1.0	< 9.3	< 0.93	< 0.93	31 J	< 1.9	0.2
	4/18/2012	< 1.0	< 1.0	< 9.7	< 0.97	< 2.4	5.9	< 2.0	0.21
	11/8/2012	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	23	< 1.9	0.45
	4/10/2013	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	5.6	< 1.9	1.53
	10/16/2013	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	23	< 1.9	0.84
	4/15/2014	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	24	< 1.9	1.67
	10/21/2014	< 0.06	NA	NA	NA	NA	27	NA	0.18
4/21/2015	< 0.42	NA	NA	NA	NA	26	NA	0.00	
East Sump	7/25/2007	7.5	30	< 9.5 U	29	< 0.95 U	910 D	8	NA
	10/24/2007	6	16	< 9.0 UJ	13	< 0.96	960	11	NA
	1/17/2008	9.7 D	160 D	< 9.5 U	13	< 0.95 U	650 D	8.1	NA
	4/15/2008	12	710	< 9.5 UJ	19	< 0.95	730	27	NA
	7/28/2008	5.6	69	< 9.6	21	< 0.96	600	5.6	NA
	10/24/2008	7.9	57	NA	17	< 0.97	1,200	14	NA
	1/30/2009	2.3	< 1	< 9.5	13	< 0.95	580	6.2	NA
	4/20/2009	4.3	79	< 9.6 J	7.6	< 0.96	590	3.6	NA
	10/21/2009	2.4	< 1.0	< 11 J	3.4	< 1.1	500	15	NA
	4/22/2010	1.9	< 1.0	< 10 J	4.4	< 1.0	330	4.4	NA
	10/21/2010	14	< 1.0	< 10	6.7	< 1.0	760	18	NA
	10/10/2011	9.7	< 1.0	< 9.5	3.3 J	< 0.95	310 J	5.1 J	NA
	4/19/2012	1.9	< 1.0	< 9.5	4.4	< 2.4	280	< 1.9	NA
	11/7/2012	< 1.0	< 1.0	< 9.5 UJ	2.4	< 0.95	220	2.4	NA
	4/10/2013	< 1.0	< 1.0	< 9.5	2.0	< 0.95	200	2.8	NA
	10/16/2013	< 1.0	< 1.0	< 9.5 UJ	1.8	< 0.95	260	2.8	NA
	4/14/2014	< 1.0	< 1.0	< 9.5	1.6	< 0.95	190	< 1.9	NA
	10/21/2014	< 0.06	< 0.11	NA	NA	NA	200	NA	NA
4/20/2015	< 0.42	1.2 J	NA	NA	NA	150	NA	NA	

Well	Date	VOCs (µg/L) (EPA Method 8021B/8260)		SVOCs (µg/L) (EPA Method 8270C SIM)					Oxygen (mg/L)
		Benzene	Toluene	Benzoic Acid	Biphenyl	Bis (2-ethylhexyl) phthalate	Diphenyl Oxide	Phenol	
	Cleanup Level	1.2	2,000	24,590	230	1.8	410	2,560	—
West Sump	7/25/2007	270 D	1,900 D	12	180 D	<0.95 U	1,600 D	9.5	NA
	7/25/2007 Dup	270 D	1,500 D	11	160 D	2.5	1,600 D	14	NA
	10/24/2007	270 J	1,300 J	32 J	190	<0.96	2,200	22 J	NA
	10/24/2007 Dup	450 J	2,000 J	20 J	210	<0.95	2,100	16 J	NA
	1/17/2008	410 D	8,300 D	9.8	45	<0.96 U	620 D	62 D	NA
	1/17/2008 Dup	400 D	7,900 D	< 9.7 U	42	<0.97 U	600 D	55 D	NA
	4/15/2008	79	820	< 9.5 UJ	160	1.1	1,200	8.7	NA
	4/15/2008 Dup	83	780	< 9.5 UJ	160	<0.95	1,200	8.4	NA
	7/28/2008	200	740	< 9.5	140	<0.95	1,300	18	NA
	7/28/2008 Dup	200	740	< 9.5	140	<0.95	1,200	21	NA
	10/24/2008	140	1,700	26 J-	110	<0.95	1,000	15	NA
	1/30/2009	160	1,400	26	78	<0.95	880	2.5	NA
	1/30/2009 Dup	150	1,300	< 9.5	110	<0.95	870	17	NA
	4/20/2009	26	78	< 9.6 J	150	<0.96	1,100	5.7	NA
	4/20/2009 Dup	27	78	< 9.6 J	130	<0.96	1,000	5.3	NA
	10/20/2009	100	1,100	< 9.5 J	5.0 J	<0.95	570 J	31	NA
	10/21/2009 Dup	100	1,100	< 9.5 J	59 J	<0.95	970 J	28	NA
	4/22/2010	56	77	< 9.0 J	46	<0.95	490	5	NA
	4/22/2010 Dup	59	85	< 9.0 J	45	<0.99	490	6.8	NA
	10/21/2010	42	69	< 9.8	15	< 0.98	470	100	NA
	10/10/2011	33	210	<9.5	45 J	<0.95	730 J	8.7 J	NA
	10/10/2011 Dup	33	210	<9.3	23 J	<0.93	560 J	20 J	NA
	4/19/2012	71	230	<9.5	27	< 2.4	320	4.2	NA
	4/19/2012 Dup	71	230	<9.5	27	< 2.4	310	4.3	NA
	11/7/2012	52	109	<9.5 UJ	49	<0.95	760	6.1	NA
	11/7/2012 Dup	48	101	<9.5 UJ	46	<0.95	750	6.1	NA
	4/10/2013	34	23	12	42	<0.95	410	5.0	NA
	4/10/2013 Dup	34	22	9.8	42	<0.95	430	5.3	NA
10/16/2013	33	18	<9.5	45	<0.95	770	4.6	NA	
10/16/2013 Dup	33	19	<9.5	42	<0.95	750	5.1	NA	
4/14/2014	67	120	<9.5 UJ	47	<0.95	520	7.4	NA	
4/14/2014 Dup	72	120	<9.5 UJ	46	<0.95	520	8.4	NA	
10/21/2014	4.4	0.91	NA	NA	NA	830	NA	NA	
10/21/2014 Dup	4.4	0.85	NA	NA	NA	980	NA	NA	
4/20/2015	56	60	NA	NA	NA	550	NA	NA	
NIA Intermediate Sand (Historically monitored for arsenic & copper, monitoring ceased October 2014 per Ecology Approval: Appendix									
MW-201	10/25/2007	NA	NA	NA	NA	NA	NA	NA	NA
	4/17/2008	NA	NA	NA	NA	NA	NA	NA	NA
	10/24/2008	NA	NA	NA	NA	NA	NA	NA	NA
	4/20/2009	NA	NA	NA	NA	NA	NA	NA	NA
	11/6/2009	NA	NA	NA	NA	NA	NA	NA	NA
	4/22/2010	NA	NA	NA	NA	NA	NA	NA	NA
	10/21/2010	NA	NA	NA	NA	NA	NA	NA	NA
	10/10/2011	NA	NA	NA	NA	NA	NA	NA	0.2
	4/18/2012	NA	NA	NA	NA	NA	NA	NA	0.37
	11/7/2012	NA	NA	NA	NA	NA	NA	NA	0.81
	4/10/2013	NA	NA	NA	NA	NA	NA	NA	1.5
	10/16/2013	NA	NA	NA	NA	NA	NA	NA	0.43
4/15/2014	NA	NA	NA	NA	NA	NA	NA	0.90	
Removed from monitoring program in October 2014									
MW-205	10/25/2007	NA	NA	NA	NA	NA	NA	NA	NA
	4/17/2008	NA	NA	NA	NA	NA	NA	NA	NA
	10/28/2008	NA	NA	NA	NA	NA	NA	NA	NA
	4/20/2009	NA	NA	NA	NA	NA	NA	NA	NA
	10/22/2009	NA	NA	NA	NA	NA	NA	NA	NA
	4/22/2010	NA	NA	NA	NA	NA	NA	NA	NA
	10/21/2010	NA	NA	NA	NA	NA	NA	NA	NA
	10/10/2011	NA	NA	NA	NA	NA	NA	NA	0.73
	4/18/2012	NA	NA	NA	NA	NA	NA	NA	0.27
	11/7/2012	NA	NA	NA	NA	NA	NA	NA	0.82
	4/10/2013	NA	NA	NA	NA	NA	NA	NA	2.24
	10/16/2013	NA	NA	NA	NA	NA	NA	NA	2.20
4/15/2014	NA	NA	NA	NA	NA	NA	NA	0.96	
Removed from monitoring program in October 2014									

Notes:

< - Result is non-detected above the laboratory detection limit.

< - **Detection limit above cleanup level.**

Bold indicates detection.

Dup - Field Duplicate Sample.

NA - Not analyzed. Ecology letter (10/16/14) approved removal of additional analytes &/or wells from the monitoring program.

J - Estimated concentration.

UJ - Not detected, estimate concentration.

Bold and shaded Detection above cleanup level.

EPA = U.S. Environmental Protection Agency; µg/L Micrograms per liter; mg/L = milligrams per liter; NIA = North Impacted Area;

SVOC =

7.4 CA Groundwater Monitoring Results

Source: ThermoRetec, December 2000

Well	Date	VOCs (µg/L) (EPA Method 8021B/8260)		SVOCs (µg/L) (EPA Method 8270C SIM)				Dissolved Oxygen (mg/L)	
		Benzene	Toluene	Benzoic Acid	Biphenyl	Bis (2-ethylhexyl) phthalate	Diphenyl Oxide		Phenol
		1.2	2,000	24,590	230	1.8	410		2,560
KC-9	10/22/2009	28	1.7	< 9.5 J	1300	< 0.95	5,400	21	0.43
	4/23/2010	5	< 1.0	< 9.0 J	170	< 0.98	730	7.4	1.72
	10/21/2010	14	< 1.0	< 9.6	840	< 0.96	3,600	18	NA
	10/10/2011	10	< 1.0	< 9.3	420	< 2.4	1,900	21	0.15
	4/18/2012	3.6	< 1.0	< 9.5	150	< 0.93	600	8.7	4.3
	11/8/2012	2.2	< 1.0	< 9.5 UJ	170	< 0.95	1,000	10	0.92
	4/10/2013	3.7	< 1.0	11	110	< 0.95	810	5.1	1.63
	10/16/2013	4.3	< 1.0	< 9.5 UJ	99	< 0.95	1,300	6.6	0.83
	4/15/2014	2.8	< 1.0	< 9.5	51	< 0.95	740	6.4	2.21
	10/21/2014	Inaccessible due to construction; not sampled							
4/21/2015	5.8	< 0.44	5.4 J	150	1.2 JB	1300	9.4 J	NA	
MW-210	10/20/2009	51	< 1.0	< 9.6 J	74	< 0.96	1,800	19	0.36
	4/22/2010	23	< 1.0	< 10 J	79	< 1.0	820	27	0.64
	10/21/2010	22	< 1.0	< 9.8	39	< 0.98	1,700	17	NA
	10/10/2011	7.7	< 1.0	< 9.3	100	< 2.4	1,400	11	0.30
	4/18/2012	16	< 1.0	9.6	150	< 0.93	990	40	2.45
	11/8/2012	5.7	< 1.0	< 9.5 UJ	21	< 0.95	850	4.8	2.59
	4/11/2013	1.5	< 1.0	< 9.5	10	< 0.95	580	4.9	0.89
	10/15/2013	< 1.0	< 1.0	< 9.9 UJ	< 0.99	< 0.99	250	7.6	0.90
	4/16/2014	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	490	< 1.9	2.56
	10/23/2014	< 0.060	< 0.11	< 0.39 H	< 0.095 H	< 0.26 H	590 H	1.2 JH	0.67
4/22/2015	< 0.42	< 0.44	< 0.39	< 0.095	1.2 JB	330	2.2 J	0.62	
MW-230	10/22/2009	32	9.9	91 J	380	1.7	520	12	0.20
	4/23/2010	18	5.9	< 200 J	350	< 20	390	93	0.21
	10/20/2010	23	5.2	74	470	6.8	590	44	NA
	10/11/2011	44	5.2	22	450	< 2.4	460	27	0.32
	4/18/2012	10	1.3	180	160	< 0.95	220	38	0.24
	11/7/2012	16	2.7	30 J	130	< 0.95	220	48	3.33
	4/11/2013	31	5.4	130	160	< 0.95	240	39	0.24
	10/16/2013	8.8	8.0	79,000 J	170	< 1.1	420	210	0.41
	4/15/2014	7.9	6.0	< 48	500	< 4.8	520	22	0.14
	10/23/2014	6.4	1.2	< 0.39 H	490 H	< 0.26 H	690 H	22 H	3.11
10/23/2014 Dup	4.8	0.87 J	9.3 JH	520 H	< 0.26 H	690 H	23 H	3.11	
4/22/2015	14	0.90 J	28	250	2.5 JB	320	20 J	0.47	
MW-231	10/22/2009	110	68,000	30 J	840	< 0.95	2,300	14	0.20
	4/22/2010	48	18,000	14 J	410	< 0.95	920	4.7	0.18
	10/20/2010	110	48,000	23	260	< 0.96	710	2.5	NA
	10/11/2011	50	48,000	13	560	< 2.4	1,700	44	0.39
	4/18/2012	5.3	1,200	< 9.5	32	< 0.95	110	4.0	2.6
	11/8/2012	75	23,100	15 J	210	< 0.95	730	5.5	0.94
	4/11/2013	25	14,000	22	220	< 0.95	930	14	0.51
	10/16/2013	13	15,000	230 J	240	< 0.95	820	3.9	0.50
	4/15/2014	9.1	6,200	< 9.5	77	< 0.95	370	3.4	0.85
	10/23/2014	< 60	6,600	< 0.39 H	450 H	0.86 JH	2,200 H	3.5 JH	0.17
4/22/2015	< 21	3,600	< 0.39	320	1.3 JB	1,700	2.6 J	0.28	
4/22/2015 Dup	< 100	3,800	< 0.39	300	1.4 JB	1,800	3.8 J	0.28	
PZ-104	10/20/2009	5.8	< 1.0	< 9.7 J	550	< 0.97	3,600	12	0.18
	4/23/2010	4.5	< 1.0	< 9.0 J	180	< 0.95	2,600	8.6	0.25
	10/20/2010	8.3	< 1.0	< 10	260	< 1.0	4,100	83	NA
	10/10/2011	7.7	< 1.0	< 9.5	150	< 2.4	4,700	69	0.27
	4/19/2012	5.8	< 1.0	< 9.5	29	< 0.95	3,600	37	0.94
	11/8/2012	9.2	< 1.0	< 9.5 UJ	36	< 0.95	4,600	80	2.77
	4/11/2013	5.5	< 1.0	< 9.5	47	< 0.95	3,100	30	0.56
	10/16/2013	5.5	< 1.0	< 9.5 UJ	4.9	< 0.95	2,600	38	0.65
	4/15/2014	2.9	< 1.0	< 9.5	13	< 0.95	2,400	37	0.32
	10/23/2014	5.3	< 0.11	< 0.40 H	10 H	< 0.26 H	4,800 H	38 H	2.34
4/22/2015	3	< 0.44	< 0.40	6.4	1.3 JB	3000	52	0.3	
4/22/2015 Dup	3	< 0.44	< 0.39	6.3	1.2 JB	3100	46	0.3	
PZ-107	10/22/2009	NA	NA	NA	NA	NA	NA	NA	NA
	4/23/2010	5.3	590	1,300 J	1,500	< 4.0	3,600	210	0.14
	10/20/2010	37	5,300	4,300	24,000	< 200	65,000	< 390	NA
	10/11/2011 P	100	5,300	38,000	110,000	3.4	300,000	220	NA
	4/19/2012 P	18	130	7,400	1,700	600	4,300	140	NA
	11/7/2012 P	19	227	900 J	4,400	30	12,000	41	NA
	4/11/2013 P	160	2,000	8,000	140,000	1,200	330,000	270	NA
	10/16/2013 P	13	200	450 J	1,200	6.4	4,400	40	NA
	4/15/2014 P	5.5	57	640	1,000	< 9.5	2,800	53	NA
	10/23/2014 P	Not sampled							
4/23/2015	6.6	82	2100	720	6.2 B	2,200	19	NA	
PDW-117	10/22/2009	21	5.4	36 J	750	6.5	1,700	6.2	0.23
	4/22/2010	< 1.0	< 1.0	< 9.0 J	47	< 0.95	140	5.6	0.51
	10/20/2010	5.7	< 1.0	< 9.9	180	< 0.99	970	15	NA
	10/11/2011	7.6	< 1.0	< 9.5	57	< 2.4	400	8.4	0.33
	4/18/2012	1.1	< 1.0	< 9.5	41	< 0.95	180	4.4	0.67
	11/8/2012	23	< 1.0	< 9.5 UJ	48	< 0.95	360	20	0.63
	4/11/2013	4.4	< 1.0	< 9.5	160	< 0.95	1,200	6.3	0.27
	10/15/2013	5.9	< 1.0	< 10 UJ	150	< 1.0	1,000	12	0.93
	4/16/2014	4.7	< 1.0	< 9.5	59	< 0.95	740	6.3	0.78
	10/23/2014	7	0.23 J	4.8 JH	22 H	< 0.26 H	1,700 H	8.6 JH	2.62
4/22/2015	3.6	< 0.44	< 0.40	8.7	< 0.26	1,900	16	0	

Notes:

< - Result is non-detected above the laboratory detection limit.

< - Detection limit above cleanup level.

Bold indicates detection.

Dup - Field Duplicate Sample.

NA - Not analyzed. Ecology letter (10/16/14) approved removal of additional analytes &/or wells from the monitoring program. J - Estimated concentration.

UJ - Not detected, estimate concentration.

Bold and shaded Detection above cleanup level

EPA = U.S. Environmental Protection Agency; µg/L micrograms per liter; mg/L = milligrams per liter; NIA = North Impacted Area; SVOC = semivolatiles organic

7.5 WIA Groundwater Monitoring Results

Source: ThermoRetec, December 2000

Well	Date	VOCs (µg/L) (EPA Method 8021B / 8260)		SVOCs (µg/L) (EPA Method 8270C SIM)				
		Benzene	Toluene	Benzoic Acid	Biphenyl	Bis (2-ethylhexyl) phthalate	Diphenyl Oxide	Phenol
		1.2	2,000	24,590	230	1.8	410	2,560
MW-238	10/24/2007	< 1.0	< 1.0	NA	NA	NA	NA	NA
	4/22/2009	< 1.0	< 1.0	< 9.6 J	< 0.96	< 0.96	< 0.96	< 2
	10/20/2009 *	NA	NA	NA	NA	NA	NA	NA
	4/23/2010 *	NA	NA	NA	NA	NA	NA	NA
	10/11/2011 *	NA	NA	NA	NA	NA	NA	NA
	4/18/2012	< 1.0	< 1.0	<9.7	<0.97	<2.5	<0.97	<2
	11/7/2012	< 1.0	< 1.0	<9.5 UJ	<0.95	< 0.95	<0.95	<1.9
	4/10/2013 *	NA	NA	NA	NA	NA	NA	NA
	10/17/2013	< 1.0	< 1.0	<15 UJ	<1.5	<1.5	<1.5	<3.0
4/16/2014	< 1.0	< 1.0	<9.5	<0.95	<0.95	<0.95	<1.9	
Removed from monitoring program in October 2014								
MW-244	10/24/2007	1.1	< 1.0	< 9.8 UJ	< 0.98	< 0.98	720	30
	4/17/2008	1.1	< 1.0	< 9.7 UJ	< 0.97	< 0.97	560	16
	10/27/2008	3	< 1.0	11 J	< 0.95	< 0.95	960	20
	4/22/2009	1	< 1.0	< 9.6 J	< 0.96	< 0.96	1,300	9.1
	10/20/2009	1.3	< 1.0	< 9.8 J	< 0.98	< 0.98	820	41
	4/22/2010	< 1.0	< 1.0	< 9.0 J	< 0.98	< 0.98	1,000	38
	10/19/2010	< 1.0	< 1.0	< 9.6	< 0.96	< 0.96	340	5.7
	10/11/2011	< 1.0	< 1.0	<9.5	<0.95	<0.95	68	<1.9
	4/18/2012	< 1.0	2,400	<9.5	<0.95	<2.4	550	4.8
	11/8/2012	< 1.0	< 1.0	<9.5 UJ	<0.95	<0.95	590	7.8
	11/8/2012 Dup	< 1.0	< 1.0	<9.5 UJ	<0.95	<0.95	600	8.4
	4/11/2013	< 1.0	< 1.0	<9.5	<0.95	<0.95	530	14
	4/11/2013 Dup	< 1.0	< 1.0	<9.5	<0.95	<0.95	610	14
	10/17/2013	< 1.0	< 1.0	<9.5 UJ	<0.95	<0.95	410	8.2
	10/17/2013 Dup	< 1.0	< 1.0	NA	NA	NA	NA	NA
4/15/2014	< 1.0	< 1.0	<9.5	<0.95	<0.95	600	9.4	
10/22/2014	0.12 J	< 0.11	NA	NA	< 0.28	570	NA	
4/21/2015	< 0.42	< 0.44	NA	NA	1.2 JB	450	NA	
MW-255	10/25/2007	< 1.0	< 1.0	< 9.4 UJ	< 0.94	< 0.94	720	9.3 J
	4/17/2008	< 1.0	< 1.0	< 9.7 UJ	< 0.97	< 0.97	< 0.97	< 2
	10/27/2008	< 1.0	< 1.0	< 9.5 J	< 0.95	< 0.95	390	17 J
	4/22/2009	< 1.0	< 1.0	< 9.6 J	< 0.96	< 0.96	400	8.1
	10/20/2009	< 1.0	< 1.0	< 9.6 J	< 0.96	< 0.96	310 J	9.4 J
	4/23/2010	< 1.0	16	< 9.0 J	< 0.98	< 0.98	2.4 J	< 2.0
	10/20/2010	< 1.0	< 1.0	< 9.9	< 0.99	< 0.99	380	12
	10/11/2011	< 1.0	< 1.0	<9.5	5.1	<0.95	13	<1.9
	4/19/2012	< 1.0	< 1.0	<9.5	<0.95	<2.4	<0.95	<1.9
	11/8/2012	< 1.0	< 1.0	<9.5 UJ	<0.95	<0.95	87 J	2.4
	4/11/13	< 1.0	< 1.0	<9.5	<0.95	<0.95	<0.95	<1.9
	10/17/2013	< 1.0	3.1	12 J	<0.95	<0.95	330	5.3
4/16/2014	< 1.0	< 1.0	<9.5	<0.95	<0.95	<0.95	<1.9	
Removed from monitoring program in October 2014								
KC-11	10/20/2009 *	NA	NA	NA	NA	NA	NA	NA
	4/23/2010 *	NA	NA	NA	NA	NA	NA	NA
	10/11/2011	< 1.0	2.8	26	28	<9.9	160	<9.9
	4/19/2012	1.4	< 1.0	<9.5	<0.95	<2.4	4.6	<1.9
	11/7/2012 *	NA	NA	NA	NA	NA	NA	NA
	4/10/2013	<1.0	<1.0	<9.5	<0.95	<0.95	38	<1.9
	10/16/2013	1.0	<1.0	<10 UJ	<1.0	<1.0	18	<2.0
	4/15/2014	< 1.0	< 1.0	<9.5	<0.95	<0.95	4.3	<1.9
	10/22/2014 *	NA	NA	NA	NA	NA	NA	NA
4/22/2015	< 0.42	< 0.44	NA	NA	1.3 JB	4.9	NA	
KC-13	10/20/2009 *	NA	NA	NA	NA	NA	NA	NA
	4/23/2010 *	NA	NA	NA	NA	NA	NA	NA
	10/11/2011 *	NA	NA	NA	NA	NA	NA	NA
	4/19/2012 *	NA	NA	NA	NA	NA	NA	NA
	11/7/2012 *	NA	NA	NA	NA	NA	NA	NA
	4/10/2013 *	NA	NA	NA	NA	NA	NA	NA
	10/16/2013 *	NA	NA	NA	NA	NA	NA	NA
	4/15/2014 *	NA	NA	NA	NA	NA	NA	NA
	10/22/2014 *	NA	NA	NA	NA	NA	NA	NA
4/22/2015	< 0.42	< 0.44	NA	NA	1.7 JB	1.7 J	NA	

Well	Date	VOCs (µg/L) (EPA Method 8021B / 8260)		SVOCs (µg/L) (EPA Method 8270C SIM)				
		Benzene	Toluene	Benzoic Acid	Biphenyl	Bis (2-ethylhexyl) phthalate	Diphenyl Oxide	Phenol
		Cleanup Level	1.2	2,000	24,590	230	1.8	410
USRW-2	10/25/2007	2.8	< 1.0	< 9.9 UJ	< 0.99	< 0.99	1,500	39
	10/25/2007 Dup	2.7	< 1.0	< 9.9 UJ	< 0.99	< 0.99	1,400	40
	4/17/2008	< 1.0	< 1.0	< 9.7 UJ	< 0.97	< 0.97	< 0.97	< 2
	4/17/2008 Dup	< 1.0	< 1.0	< 9.7 UJ	< 0.97	< 0.97	< 0.97	< 2
	10/28/2008	1.2	< 1.0	< 9.5 J	< 0.95	< 0.95	1,500	22
	10/28/2008 Dup	1.1	< 1.0	< 9.5 J	< 0.95	< 0.95	1,600	23
	4/22/2009	< 1.0	< 1.0	< 9.6 J	< 0.96	< 0.96	1,000	10
	4/22/2009 Dup	< 1.0	< 1.0	< 9.6 J	< 0.96	< 0.96	1,100	8.4
	10/20/2009	1.2	< 1.0	< 11 J	< 1.1	< 1.1	800	41
	10/20/2009 Dup	1.2	< 1.0	< 10 J	< 1.0	< 1.0	970	43
	4/22/2010	< 1.0	< 1.0	< 10 J	< 1.0	< 1.0	850	20
	4/22/2010 Dup	< 1.0	< 1.0	< 9.0 J	< 0.99	< 0.99	780	20
	10/19/2010	< 1.0	< 1.0	< 9.8	5	< 0.98	880	43
	10/11/2011	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	310	5.5
	10/11/2011 Dup	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	490	6.7
	4/19/2012	< 1.0	< 1.0	< 9.5	< 0.95	<2.4	400	9.6
	4/19/2012 Dup	< 1.0	< 1.0	< 9.5	< 0.95	<2.4	400	9.3
	11/7/2012	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	500	11
	11/7/2012 Dup	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	410	9.4
	4/11/2013	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	430	7.5
	4/11/2013 Dup	NA	NA	NA	NA	NA	NA	NA
	10/17/2013	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	380	6.3
10/17/2013 Dup	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	380	8.1	
4/15/2014	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	330	6.1	
4/15/2014 Dup	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	340	6.4	
10/23/2014	< 0.060	< 0.11	NA	NA	< 0.27 H	370 H	NA	
10/23/2014 Dup	< 0.060	< 0.11	NA	NA	< 0.26 H	360 H	NA	
4/22/2015	< 0.42	< 0.44	NA	NA	1.2 JB	270	NA	
North Sump	7/25/2007	< 1 U	< 1 U	< 9.5 U	< 0.95 U	< 0.95 U	550 D	38
	10/23/2007	< 1.0	< 1.0	< 9.0 UJ	< 0.95	< 0.95	600	13
	1/17/2008	< 1 U	< 1 U	< 11 U	< 1.1 U	< 1.1 U	330 D	8.4
	4/15/2008	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	490	5.2
	7/28/2008	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	950	19
	10/24/2008	140	1,500	27 J	120	< 0.95	1,100	16
	11/3/2008	< 1.0	< 1.0	< 10 J	< 1	< 1	140	38
	1/30/2009	< 1.0	< 1.0	< 9.8	< 0.98	< 0.98	710	24
	4/22/2009	< 1.0	< 1.0	< 11 J	< 1.1	3.7	570	15
	10/21/2009 *	NA	NA	NA	NA	NA	NA	NA
	4/21/2010	< 1.0	< 1.0	< 9.0 J	< 0.97	< 0.97	290	15
	10/19/2010	< 1.0	< 1.0	< 9.6	< 0.96	< 0.96	390	9.3
	10/11/2011	< 1.0	< 1.0	< 9.7	< 0.97	< 0.97	470	8.5
	4/19/2012	< 1.0	< 1.0	< 9.5	< 0.95	<2.4	320	6.2
	11/7/2012	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	380	11
	4/10/2013	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	310	5.2
	10/16/2013	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	460	7.7
	4/14/2014	< 1.0	< 1.0	< 9.7	< 0.97	< 0.97	340	8.7
10/21/2014	< 0.060	< 0.11	NA	NA	< 0.30	210	NA	
4/20/2015	< 0.42	< 0.44	NA	NA	1.1 JB	370	NA	
South Sump	7/25/2007	2.2	1.9	< 9.6 U	< 0.96 U	< 0.96 U	73 D	28
	10/23/2007	< 1.0	2.5	< 9.0 UJ	< 0.97	< 0.97	1.5 J	< 2.0
	1/17/2008	< 1 U	< 1 U	< 9.5 U	< 0.95 U	< 0.95 U	< 0.95 U	< 1.9 U
	4/15/2008	< 1.0	1.7	< 9.6 UJ	< 0.96	< 0.96	140	12
	7/28/2008	10	3	< 9.6	< 0.96	< 0.96	370	5.5
	1/30/2009	< 1.0	700	< 9.9	< 0.99	< 0.99	380	7.9
	4/22/2009	< 1.0	4.8	< 9.6 J	< 0.96	< 0.96	620	6.4
	10/21/2009 *	NA	NA	NA	NA	NA	NA	NA
	4/21/2010	< 1.0	< 1.0	< 9.0 J	< 0.97	< 0.97	130 J	13 J
	10/19/2010	< 1.0	< 1.0	< 9.6	< 0.96	< 0.96	38	9.7
	10/11/2011	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	550	11
	4/19/2012	< 1.0	3.4	< 9.7	< 0.97	< 0.97	110	2.8
	11/7/2012	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	130	2.2
	4/10/2013	< 1.0	< 1.0	11	< 0.95	< 0.95	76	6.7 J
	10/16/2013	< 1.0	< 1.0	< 9.5 UJ	< 0.95	< 0.95	230	5.2
	4/14/2014	< 1.0	< 1.0	< 9.5	< 0.95	< 0.95	130	3.3
	10/21/2014	< 0.060	< 0.11	NA	NA	< 0.26	200	NA
	4/20/2015	< 0.42	< 0.44	NA	NA	1.1 JB	160	NA

Notes:

< - Result is non-detected above the laboratory reporting limit.

< - **Detection limit above cleanup level.** \

Bold indicates detection.

Dup - Field Duplicate Sample.

NA - Not analyzed. Lack of recharge &/or Ecology letter (10/16/14) approved removal of additional analytes &/or wells from the monitoring program.

J - Estimated concentration.

B - Compound also identified in Method Blank

H - Sample was prepped or analyzed beyond the specified holding time

UJ - Not detected, estimate concentration.

N - The Matrix Spike sample recovery is not within the control limits.

Bold and shaded Detection above cleanup level.

* - Well was not sampled due to insufficient recharge.

DO = dissolved oxygen; EPA = U.S. Environmental Protection Agency; µg/L = micrograms per liter; mg/L = milligrams per liter; ORP = oxidation reduction potential; SVOC = semivolatile organic compound; VOC = volatile organic compound; WIA = West Impacted Area

8.0 Environmental Covenant Restrictive Covenant

Emerald Kalama

This Restrictive Covenant is required because the Remedial Action will result in residual concentrations of contaminants of concern (COCs) identified in the CAP (including toluene, benzene, and diphenyl oxide) that exceed the Model Toxics Control Act (MTCA) cleanup levels for groundwater specified in the CAP.

This Restrictive Covenant is required as long as hazardous substances remain at the site in concentrations that exceed MTCA cleanup levels specified in the CAP. Upon demonstration that residual concentrations of the COCs do not persist on the Property after completion of the Remedial Action specified in the Consent Decree and CAP, the owner of the Property may proceed under Section 7 of this covenant, pending Ecology's written concurrence.

The undersigned, Emerald Kalama Chemical, is the fee owner of real property in the County of Cowlitz, State of Washington, a portion of which is subject to this Restrictive Covenant (hereafter "Property"). The legal description of the Property subject to this Restrictive Covenant is contained in Exhibit A to the Consent Decree.

Emerald Kalama Chemical (hereafter "Owner") makes the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, as provided by law and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property.

Section 1. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 2. Unless authorized by the CAP or this Restrictive Covenant, any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway for a hazardous substance that remains on the Property as part of the Remedial Action, is prohibited without prior written approval from Ecology in accordance with Section 5 of this Restrictive Covenant, which approval shall not be unreasonably withheld. Such activities include, but are not limited to, the withdrawal of groundwater for domestic uses. Activities performed in accordance with Section 8 herein shall be deemed to be authorized by this Restrictive Covenant and, therefore, shall not require notification to or approval from Ecology and shall not be subject to public notice and comment under Section 5 herein.

Section 3. Except as otherwise specified herein, the Owner of the Property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. Where is it not possible for the Owner to notify Ecology of such transfer at least thirty (30) days in advance due to the timing of the transfer, the Owner must provide written notice to Ecology as soon as it becomes aware of the impending transfer. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action. This Section 3 shall not be construed as granting any exemption from,

Photo 2: NIA Interception Trench Pump



Photo 3: Wetland



Photo 4: WIA SVE System Control Panel



Photo 5: WIA ISRW System



Photo 6: Waterloo Emitter Wells

