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May 31, 2018

Ms. Gloria Sosa
Western New York Remediation Section
New York Remediation Branch
Emergency and Remediation Response Division
U.S. EPA – Region II
290 Broadway, 20th Floor
New York, NY 10007-1866

Dear Ms. Sosa:

NECCO PARK FIRST QUARTER 2018 DATA PACKAGE

Enclosed is the *First Quarter 2018 (1Q18) Data Package* for The Chemours Necco Park Hydraulic Control System (HCS) in accordance with the approved Long Term Groundwater Monitoring Plan. The data package includes an operational summary, process sample analytical data, figures showing hydrographs, potentiometric surface contours map, and vertical gradient maps. The data package also includes a 1Q18 monitoring summary for dense non-aqueous phase liquid (DNAPL).

Pumping system uptime for 1Q18 was 99.3 percent. The total volume of groundwater treated during 1Q18 was 3,894,096 gallons. DNAPL was monitored monthly and no DNAPL was observed during the quarter.

Please contact me at (716) 221-4723 if you have any questions or comments regarding this submittal.

Sincerely,

CORPORATE REMEDIATION GROUP

A handwritten signature in black ink, appearing to read "Paul F. Mazierski", written in a cursive style.

Paul F. Mazierski
Project Director

Enc. 1Q2018 Data Package

cc: M. McIntosh/NYSDEC
E. Felter/Parsons



**SOURCE AREA HYDRAULIC CONTROL SYSTEM
FIRST QUARTER 2018
GROUNDWATER MONITORING DATA PACKAGE
CHEMOURS NECCO PARK
NIAGARA FALLS, NIAGARA COUNTY, NEW YORK**

EPA ID No. NYD980532162

Prepared For:

**THE CHEMOURS COMPANY FC LLC
CORPORATE REMEDIATION GROUP**

Buffalo Avenue and 26th Street
Niagara Falls, New York 14302

Prepared By:

PARSONS

40 La Riviere Drive, Suite 350
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May 2018

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SECTION 1

DATA PACKAGE SUMMARY

1.1 INTRODUCTION

This data package presents a summary of operating and monitoring data collected during the first quarter of 2018 (1Q18) for groundwater remediation measures at the Chemours NECCO Park Site (Necco Park) in Niagara Falls, New York. Submission of this data package meets the reporting requirements defined in the agency-approved Long-Term Groundwater Monitoring Plan LTGMP (DuPont Corporate Remediation Group 2005) as well as agency-approved scope revisions (USEPA, 2010, 2012, 2015, and 2016).

This is the 51st data package submitted since the 2005 startup of the Necco Park Hydraulic Control System (HCS). It provides a summary of operations for the pumping wells and the Groundwater Treatment Facility (GWTF). Figures 1 through 13 are hydrographs depicting groundwater elevation since startup of the HCS, contours for six groundwater flow zones, and a map of vertical gradients between the A-Zone and the B-Zone. Groundwater elevation data are provided as a hard copy in Appendix A and as an electronic copy in Attachment 1.

1.2 OPERATIONAL SUMMARY

The following table provides a summary of average HCS uptime, total gallons of groundwater treated, and gallons of dense non-aqueous phase liquid (DNAPL) removed for 1Q18:

	HCS Uptime (%)	Groundwater Treated (gallons)	DNAPL Removed (gallons)
January	98.0%	1,407,682	0
February	100.0%	1,209,220	0
March	100.0%	1,277,194	0
1Q18 Total	99.3%	3,894,096	0

System downtime is categorized into two groups: HCS downtime and individual recovery well downtime. Both categories are further grouped into two types: unscheduled and scheduled downtime.

There were no scheduled and two unscheduled HCS shutdown events in the quarter. There were 2 unscheduled individual well shutdowns during the quarter: RW-4, 5, and 11 were down 87.5 hours between February 3 and 11 as a result of a low-low pH interlock at Tank 102 and RW-5 was down between March 24 and 26 for 56 hours due to the failure of the pump. The pH system was adjusted accordingly, and RW-5 was placed in operation using its inline spare. Table 1 provides a summary of well downtime for the quarter. Table 2 provides a historical operations summary by quarter since HCS operations began.

Monthly DNAPL monitoring was completed January 29, February 28, and March 29 during 1Q18. No recoverable DNAPL was observed in any of the wells during the monitoring for this quarter, as such, no DNAPL was removed during the quarter. A trace of DNAPL was noted at RW-5 during the February monitoring.

1.3 GWTF PROCESS SAMPLING

GWTF influent samples (from B/C-Zone and D/E/F-Zone) and a combined effluent sample were collected in 1Q18 in accordance with the SAMP and the approved reduction to VOCs only (USEPA, January 2012). Samples were collected by TestAmerica Laboratories of Amherst, New York on March 6, 2018 and shipped to the TestAmerica Laboratories in North Canton, Ohio for analysis. Sample results for the process sampling are included in Appendix B.

1.4 POTW COMPLIANCE

As required by the publicly-owned treatment works (POTW) Significant Industrial User (SIU) Permit #76 for Necco Park, the GWTF discharge is sampled and reported quarterly to the Niagara Falls Water Board (NFWB). The most recent Necco Park 1Q18 sewer discharge samples were collected on January 12, 2018 (following NFWB quarterly calendar). There were no permit limit exceedances in 1Q18. The results indicate that the GWTF continued operating within normal parameters during 1Q18.

SECTION 2

REFERENCES

DuPont Corporate Remediation Group, 2005. DuPont Necco Park Operations and Maintenance Plan. November 11, 2005.

DuPont Corporate Remediation Group, 2011. Letter regarding revisions to DuPont NECCO Park Groundwater Monitoring Program, December 8, 2011.

USEPA, 2010. Letter approving changes to the monitoring program, July 16, 2010

USEPA, 2012. Letter approving changes to the monitoring program, January 27, 2012

USEPA, 2015. Letter approving changes to DNAPL monitoring program, June 11, 2015

USEPA, 2016. Letter approving changes to the monitoring program, October 19, 2016

TABLES

Table 1
Individual Well Shutdown Summary for 1Q18
Chemours Necco Park

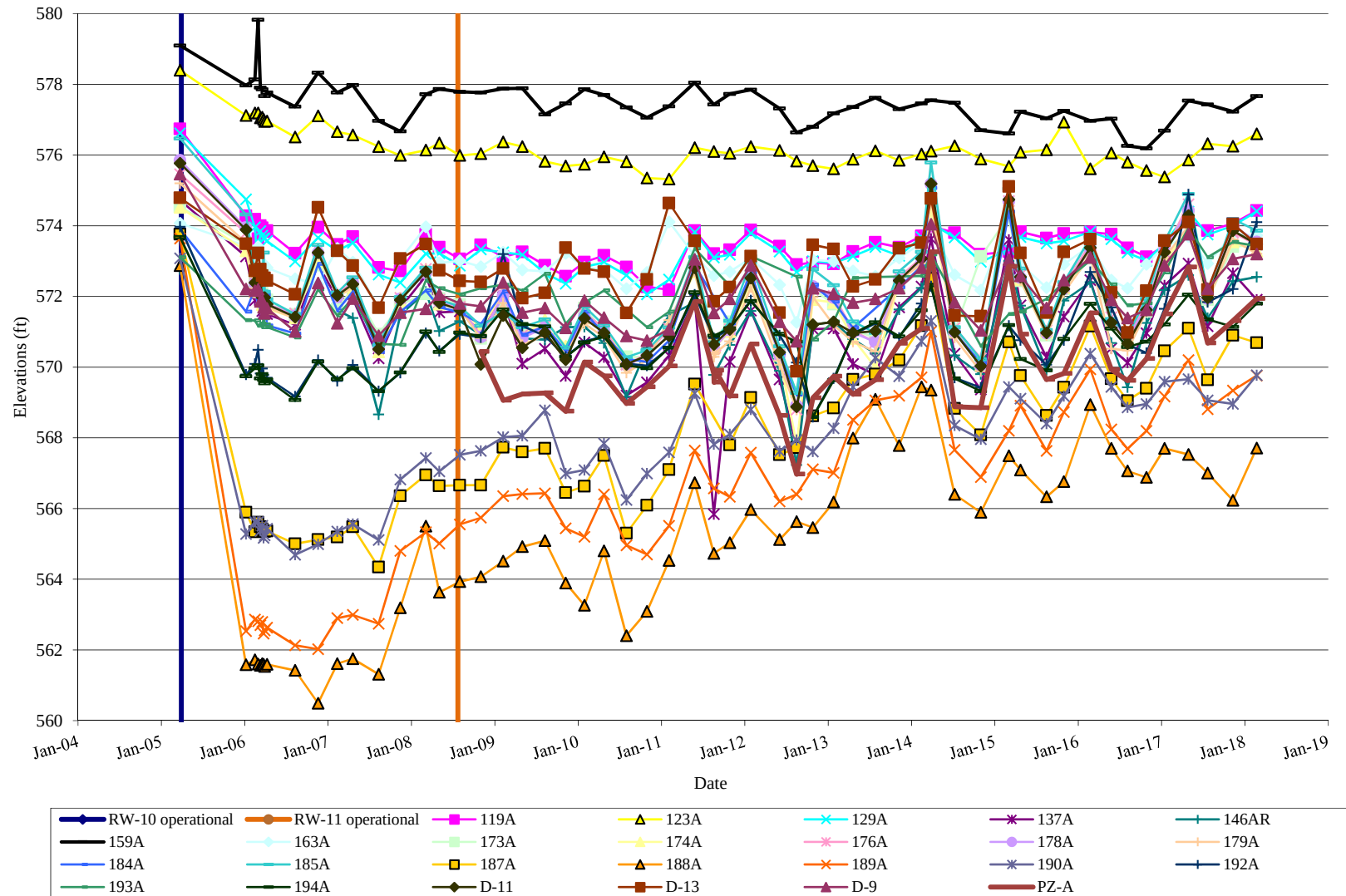
	Well ID	Date(s)	Length of Shutdown (hours)	Reason for Shutdown	Remarks
January					No wells were down for greater than 48 hours in January 2018.
February	RW-4, 5, and 11	February 3 through February 7	87.5	Low-low pH interlock on Tank 102.	
March	RW-5	March 24 through March 26	56	Failure of RW-5 pump.	

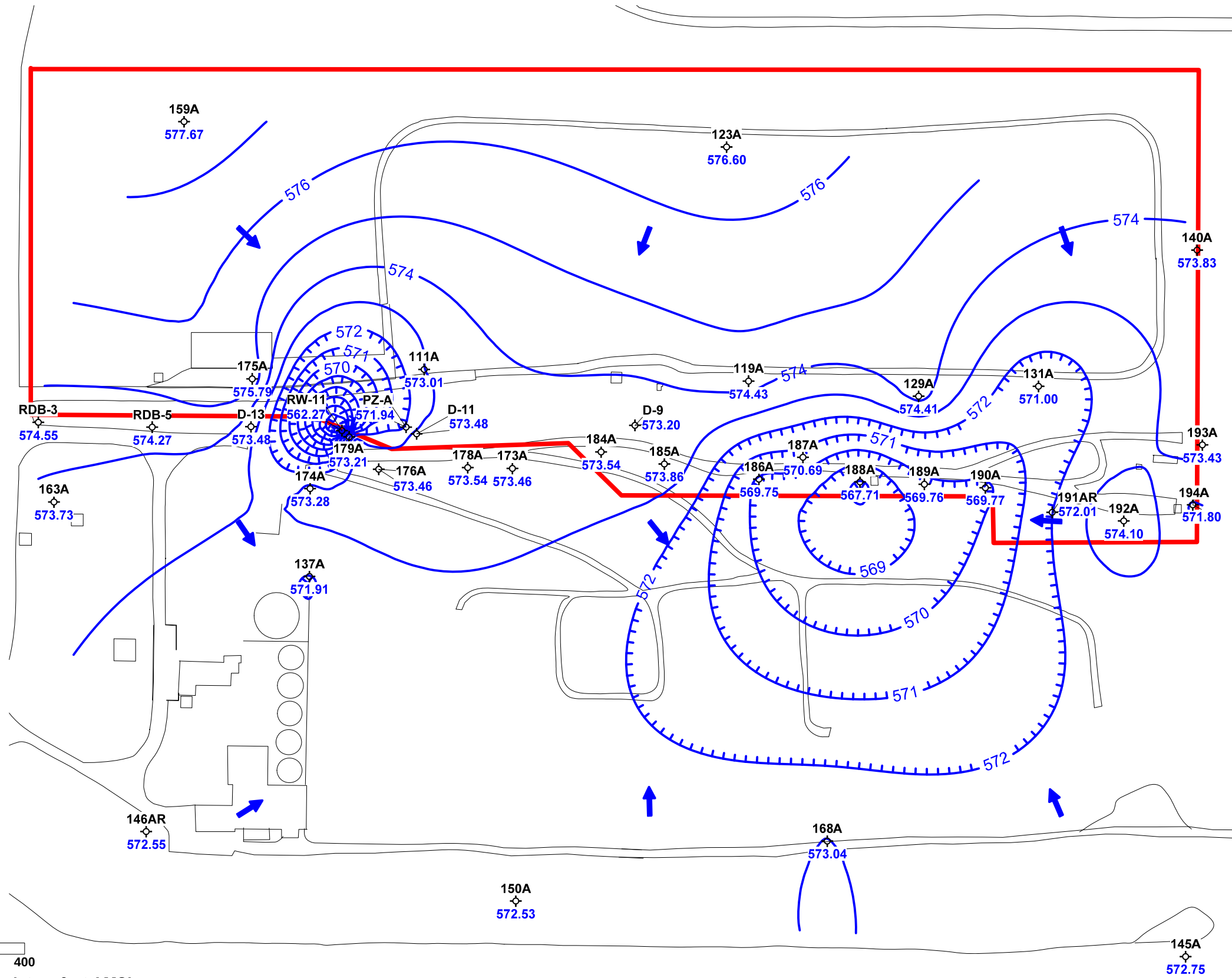
Table 2
Historical HCS Operational Summary - 1Q18
Chemours Necco Park

Reporting Period	HCS Uptime (%)	HCS Uptime Excluding Scheduled Maintenance Downtime (%)	Groundwater Treated (Gallons)	DNAPL Removed (Gallons)
2005	93.4	95.2	9,692,689	103.5
2006	94.2	95.6	12,345,079	151
2007	92.1	92.5	11,715,133	153
2008	84.0	85.4	12,244,847	512
2009	93.7	93.9	16,292,130	0
2010	92.3	99.4	13,774,768	90
2011	90.6	93.7	13,165,588	130
2012	92.9	93.1	15,227,779	72
2013	90.9	90.9	15,633,293	122
2014	94.4	94.4	14,424,850	0
1Q15	92.0	92.0	3,297,700	28
2Q15	77.7	98.9	3,262,714	0
3Q15	56.4	97.8	1,993,440	0
4Q15	90.1	95.6	3,453,781	40
1Q16	97.5	97.5	3,440,875	0
2Q16	74.4	97.1	3,723,706	0
3Q16	71.2	90.4	2,471,085	0
4Q16	90.5	100.0	3,086,585	0
1Q17	95.2	95.2	3,234,923	0
2Q17	87.0	88.5	4,022,608	0
3Q17	86.0	86.0	3,632,509	0
4Q17	72.7	96.7	2,937,773	0
1Q18	93.8	93.8	3,894,096	0
TOTALS	---	---	176,967,951	1,402
AVERAGE	87.1	94.1	---	---

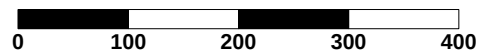
FIGURES

Figure 1
Select A-Zone Monitoring Wells
Groundwater Elevations 2005 Through 1st Quarter 2018
Chemours Necco Park





Scale: Feet



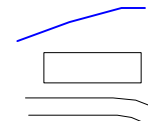
Contour Interval = 1 foot Elevation datum feet AMSL

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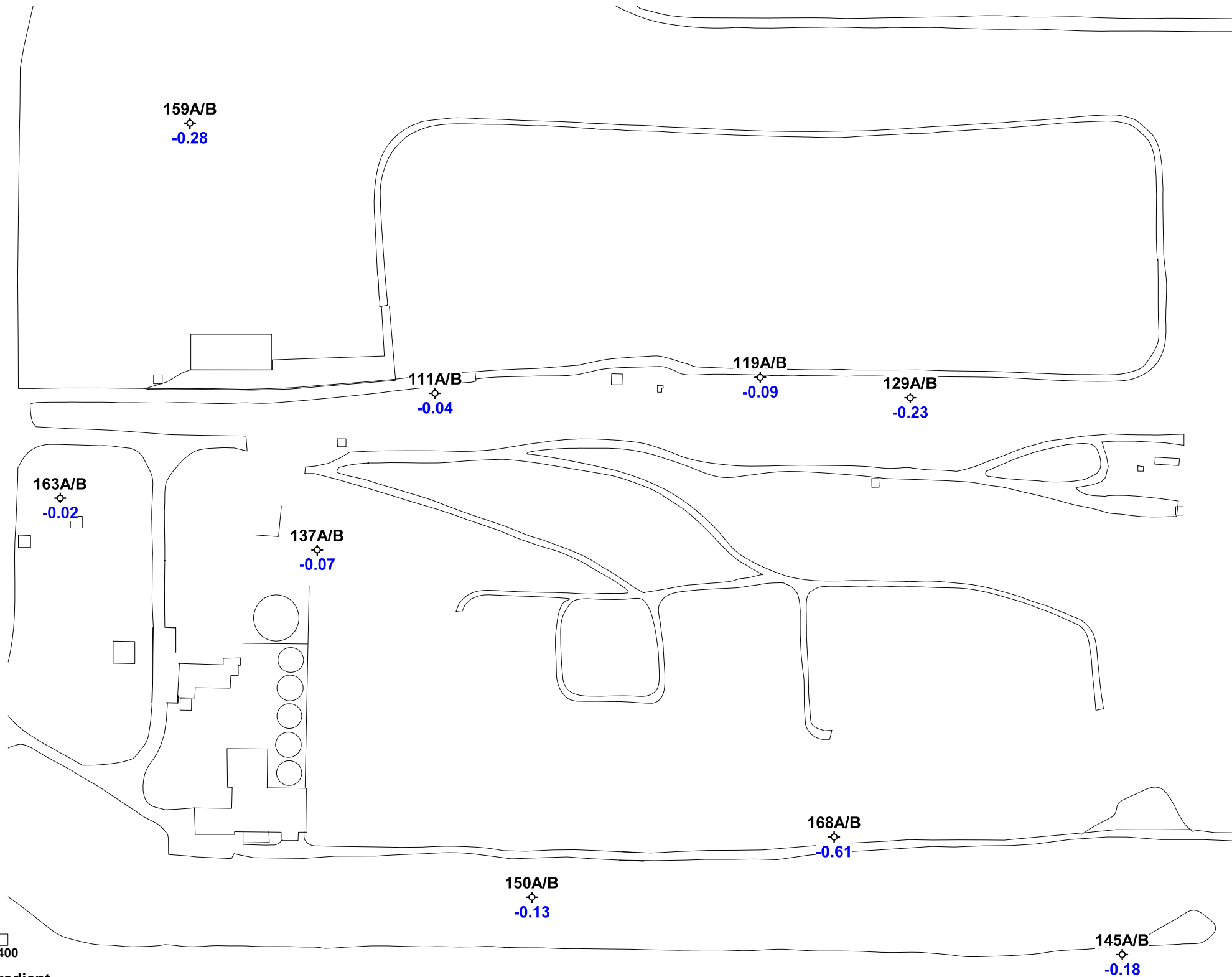
- 3B Well ID
- Monitoring Well
 - Pumping Well



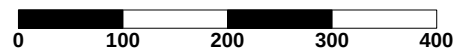
LEGEND

- Potentiometric Contour
- Structure
- Road
- Source Area Extent

Figure 2
Potentiometric Surface Map
Chemours Necco Park: A-Zone
March 6, 2018



Scale: Feet



Negative value indicates downward gradient

Elevation datum feet AMSL

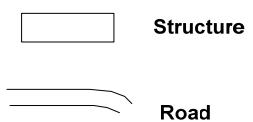
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LEGEND

- 150A/B Well ID
- ◇ Monitoring Well
- ◆ Pumping Well



-0.10 Vertical Hydraulic Gradient

Figure 3
Vertical Gradient: A-Zone to B-Zone
Chemours Necco Park
March 6, 2018

Figure 4
Select B-Zone Monitoring Wells
Groundwater Elevations 2005 through 1st Quarter 2018
Chemours Necco Park

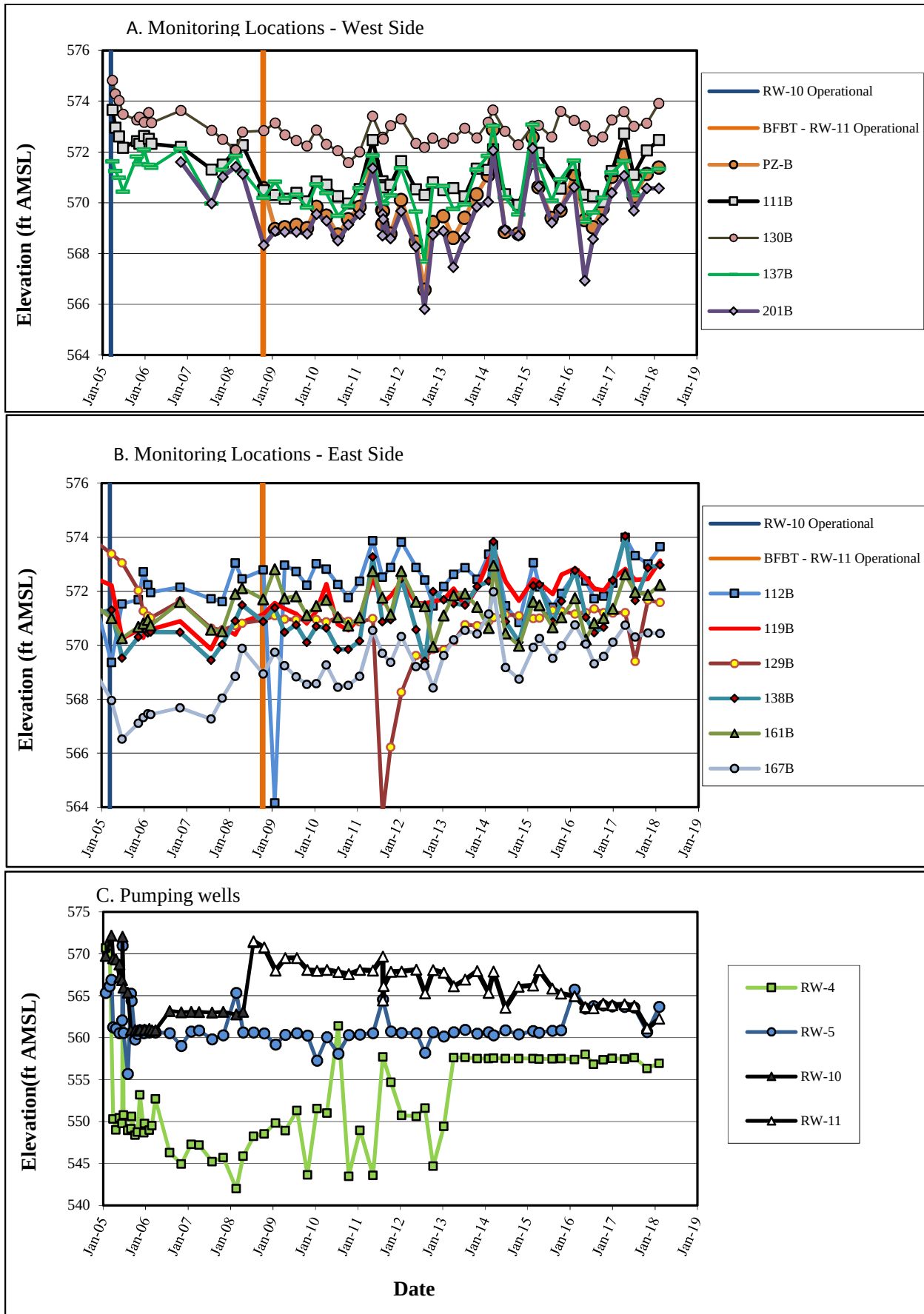
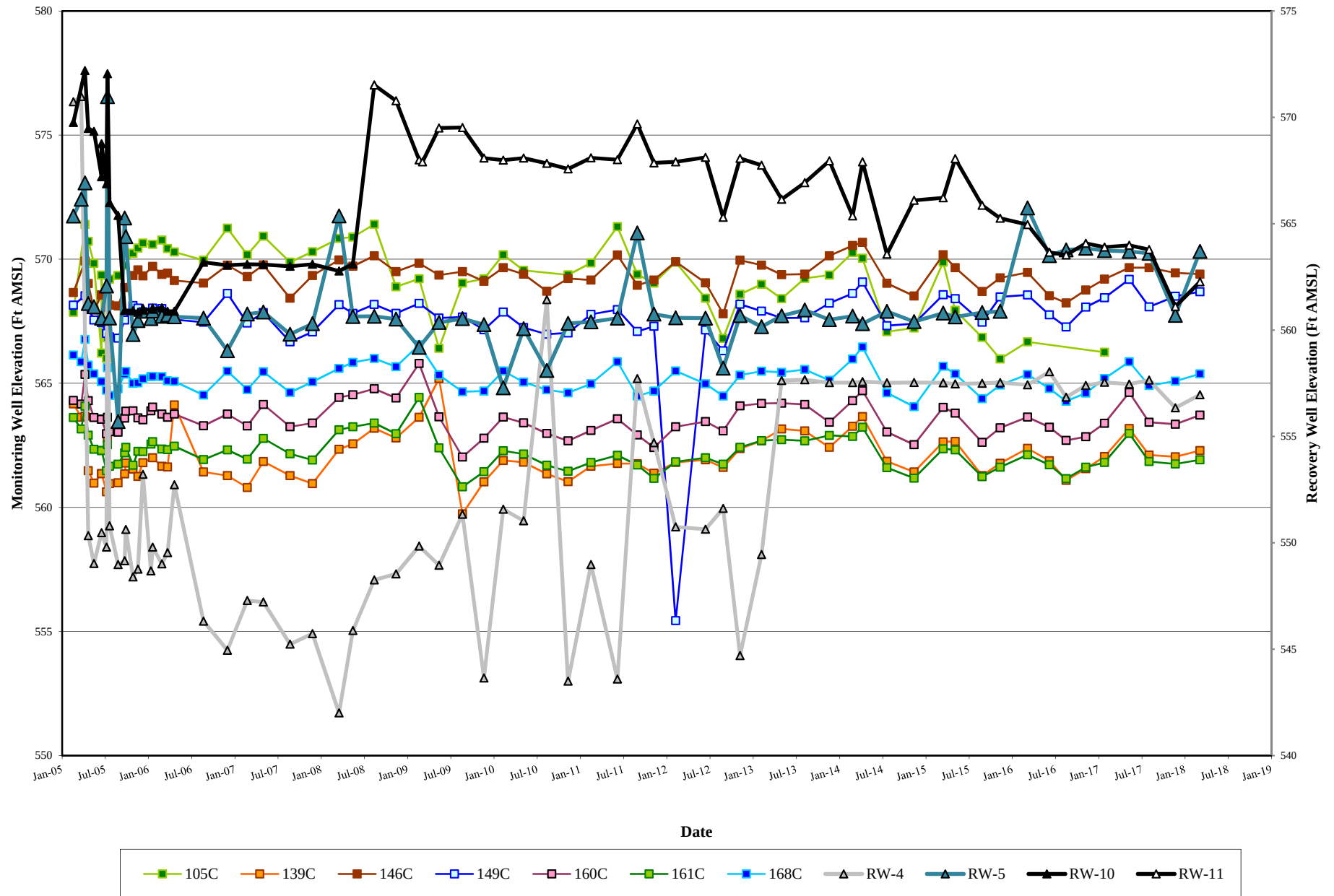
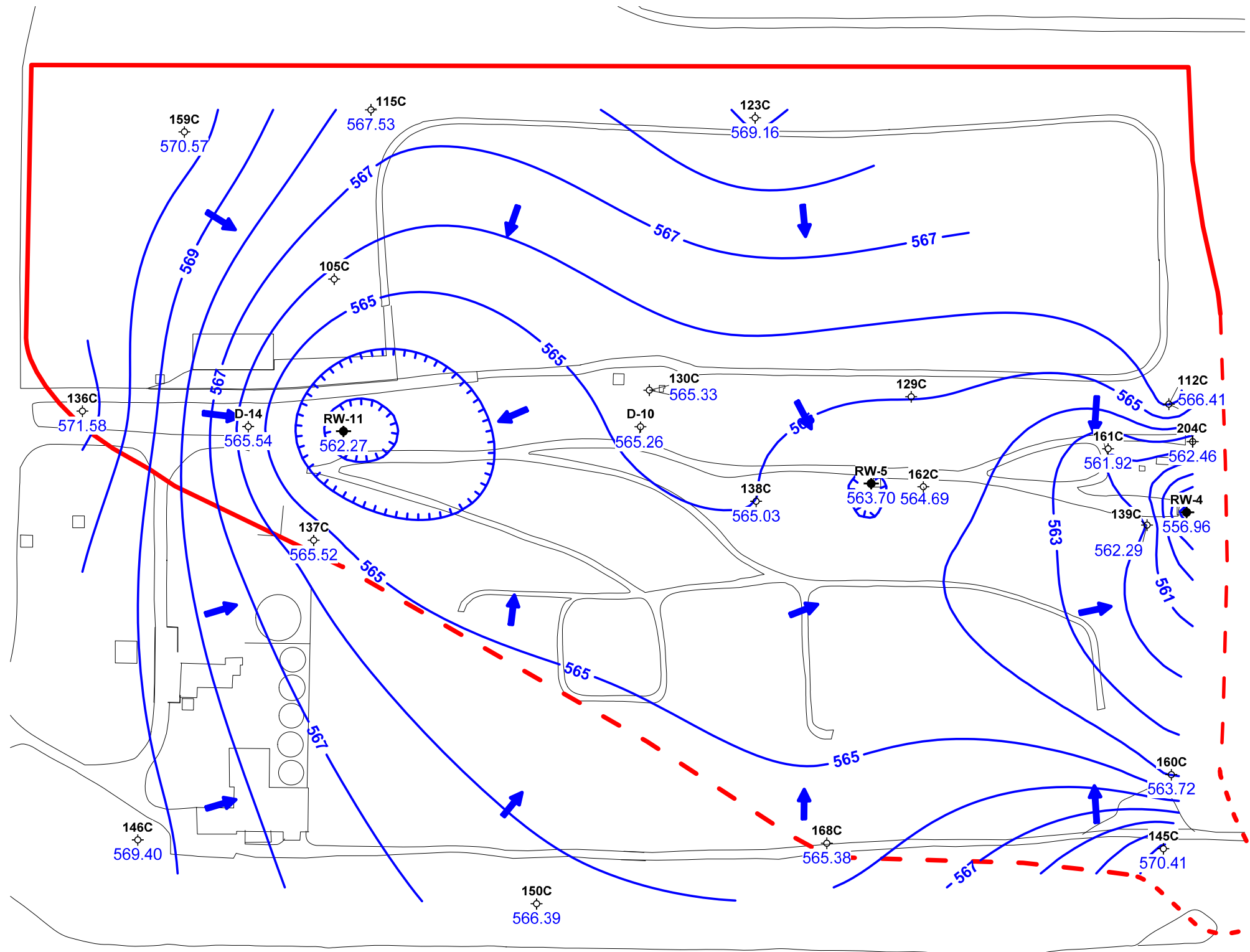


Figure 6
Select C-Zone Monitoring Wells
Groundwater Elevations 2005 Through 1st Quarter 2018
Chemours Necco Park





Scale: Feet
0 100 200 300 400
Contour interval = 1.0 foot
Elevation datum feet AMSL

Wells 149C and 151C are outside the area shown, but were used in the contouring.
The water level for 129C in August 2017 was erroneously high and was not used in the contouring.

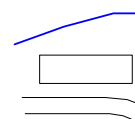
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LEGEND

3B Well ID
◇ Monitoring Well
◆ Pumping Well

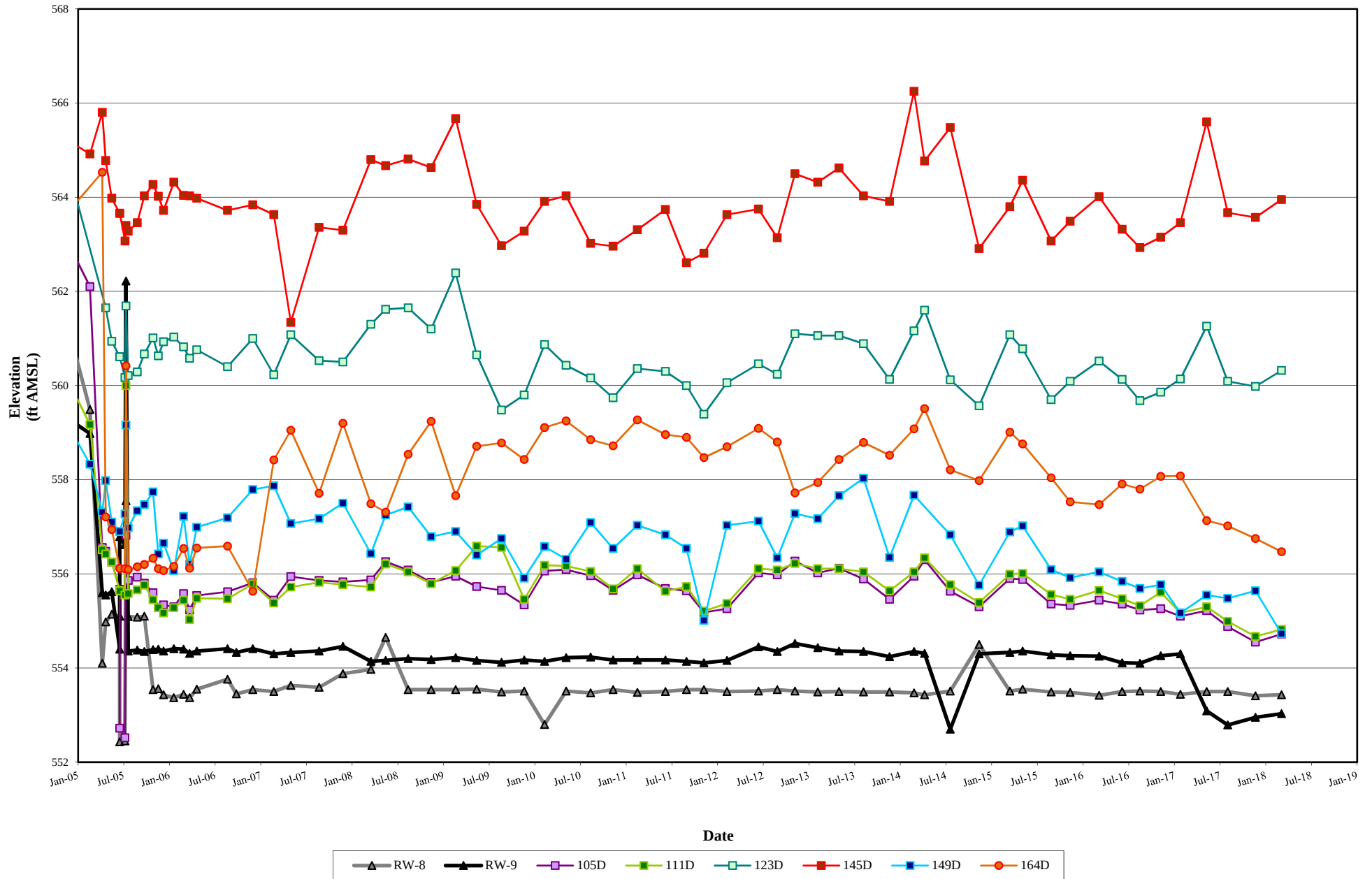


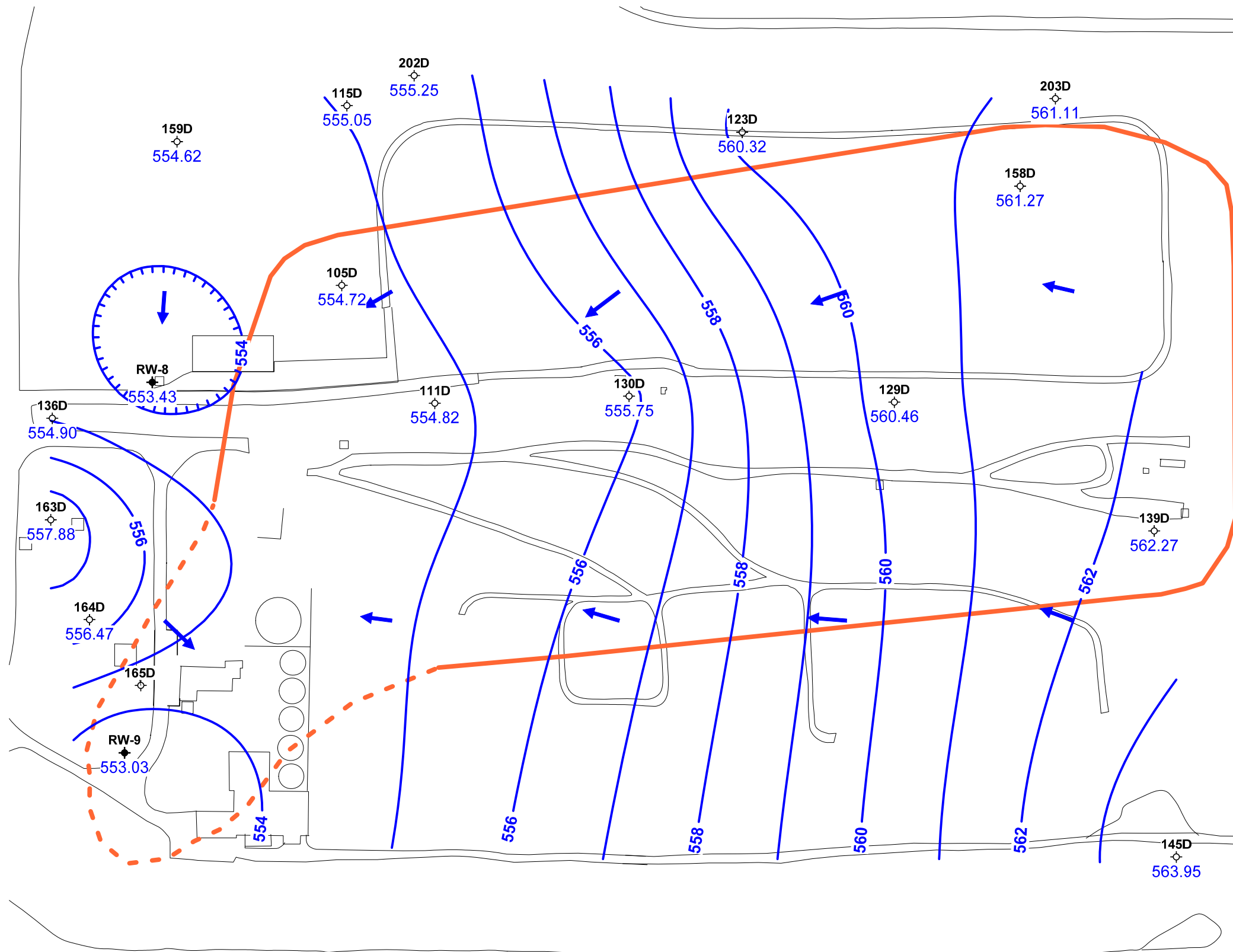
Potentiometric Contour
Structure
Road

--- Source Area Extent

Figure 7
Potentiometric Surface Map
Chemours Necco Park: C-Zone
March 6, 2018

Figure 8
Select D-Zone Monitoring Wells
Groundwater Elevations 2005 through 1st Quarter 2018
Chemours Necco Park





Scale: Feet
0 100 200 300 400

Contour interval = 1.0 feet

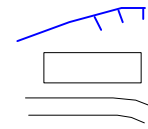
Well 149D, located outside the map area, was used in the contour interpolation.
Well 148D located downgradient was not used in the interpolation.
Well 165D was not used in the contour interpolation.

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Job number: 450860.02023	

3B Well ID
○ Monitoring Well
◆ Pumping Well

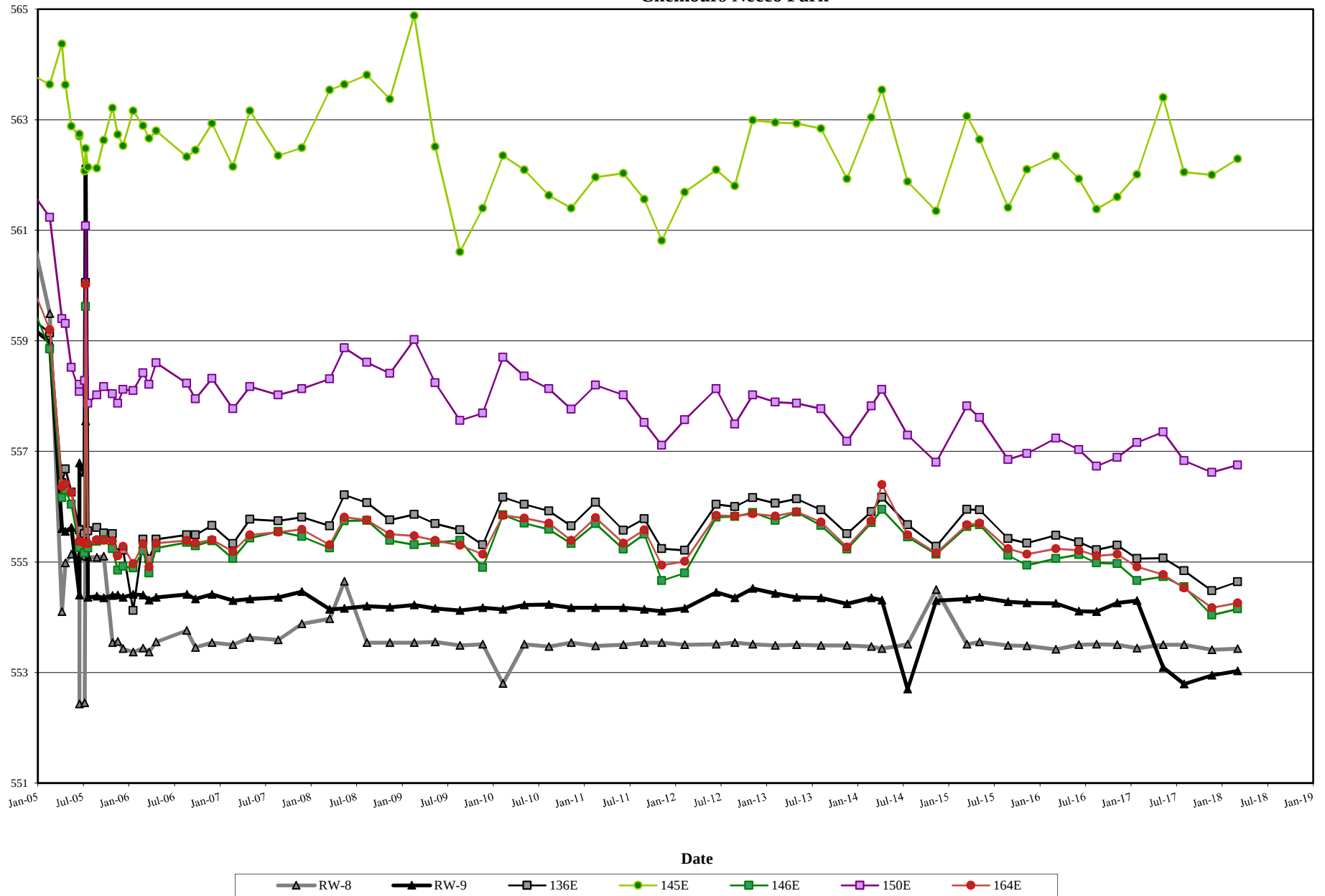


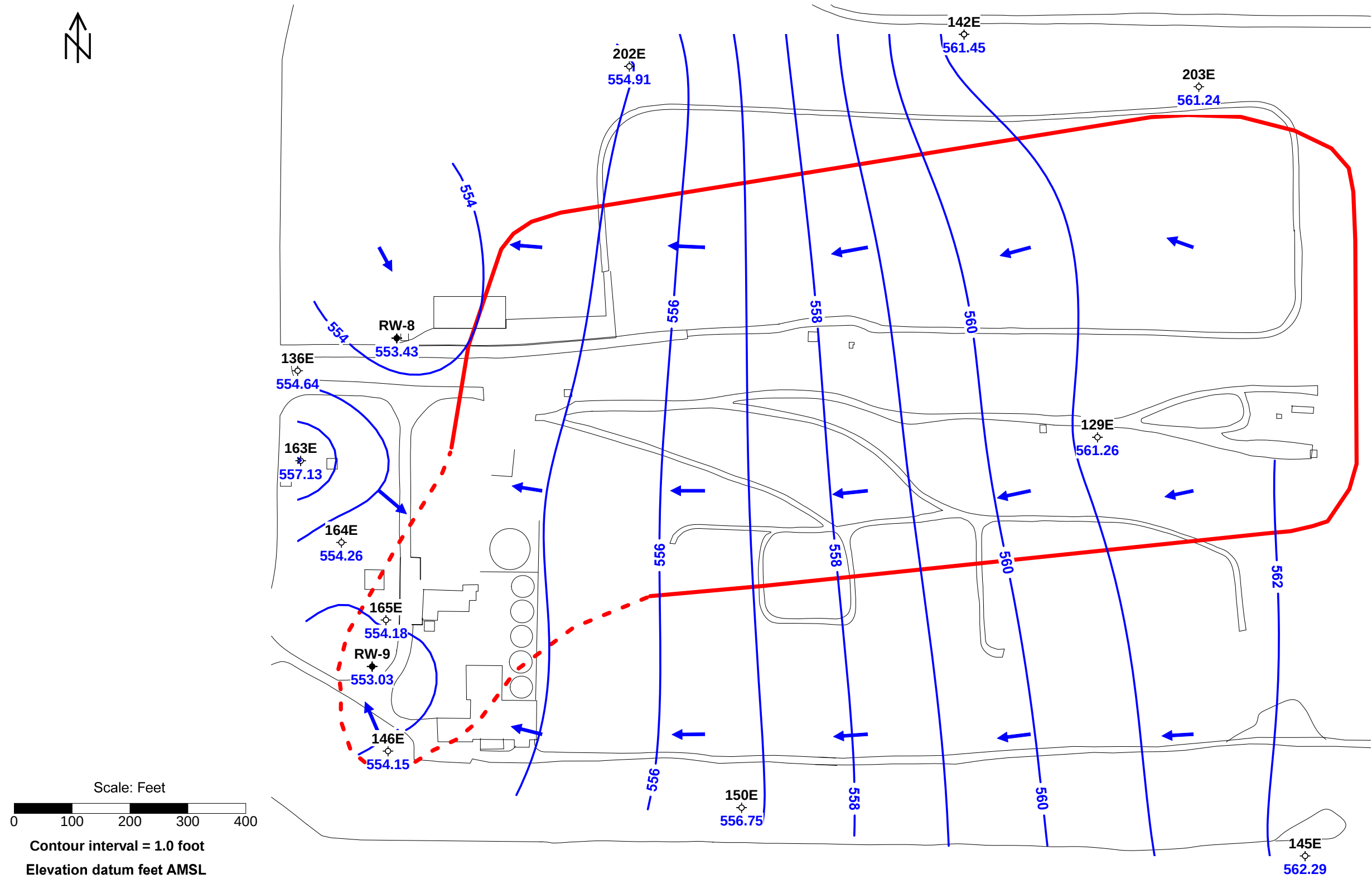
LEGEND

Potentiometric Contour
Structure
Road
- - - - - Source Area Extent

Figure 9
Potentiometric Surface Map
Chemours Necco Park: D-Zone
March 6, 2018

Figure 10
Select E-Zone Monitoring Wells
Groundwater Elevations 2005 Through 1st Quarter 2018
Chemours Necco Park





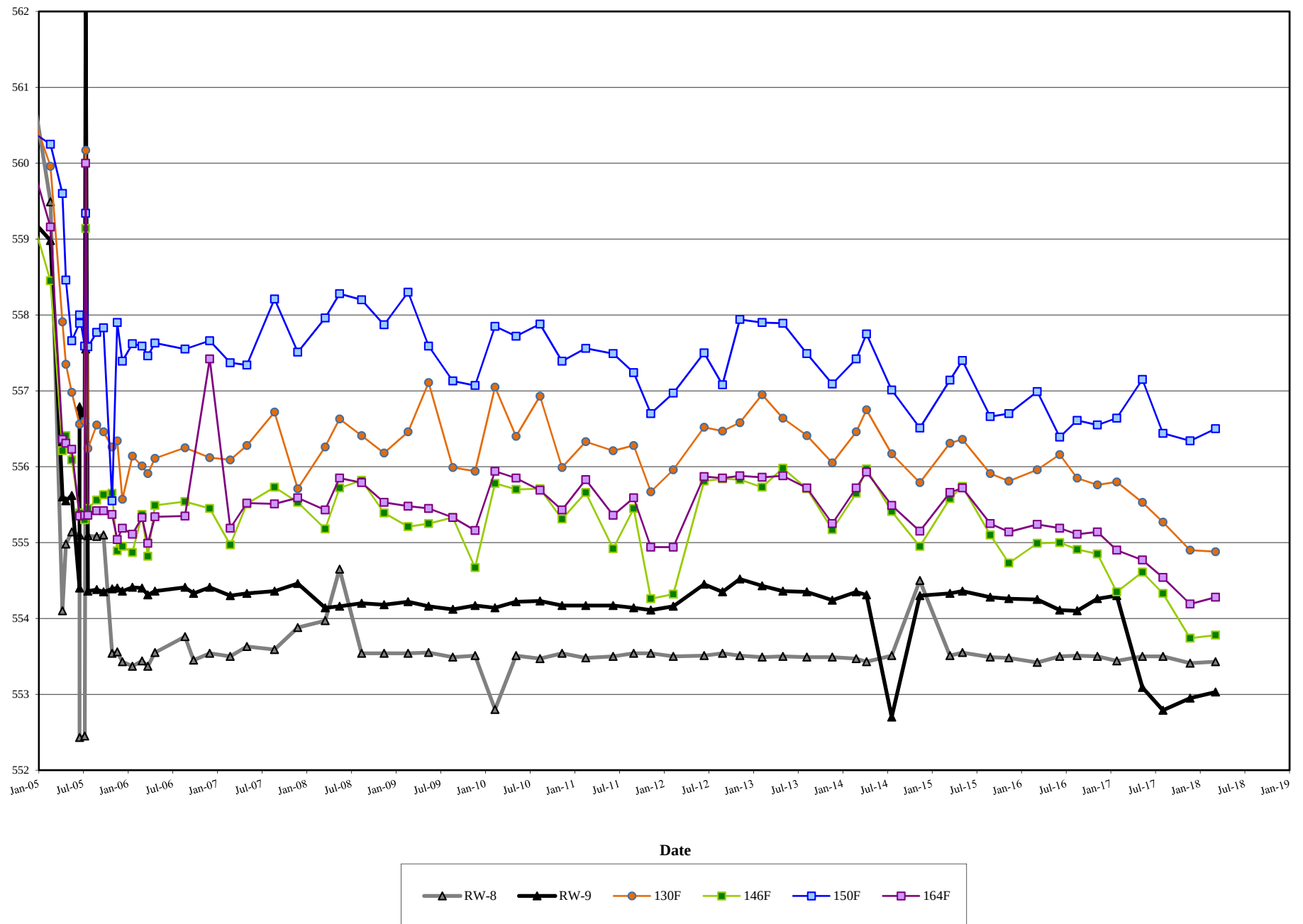
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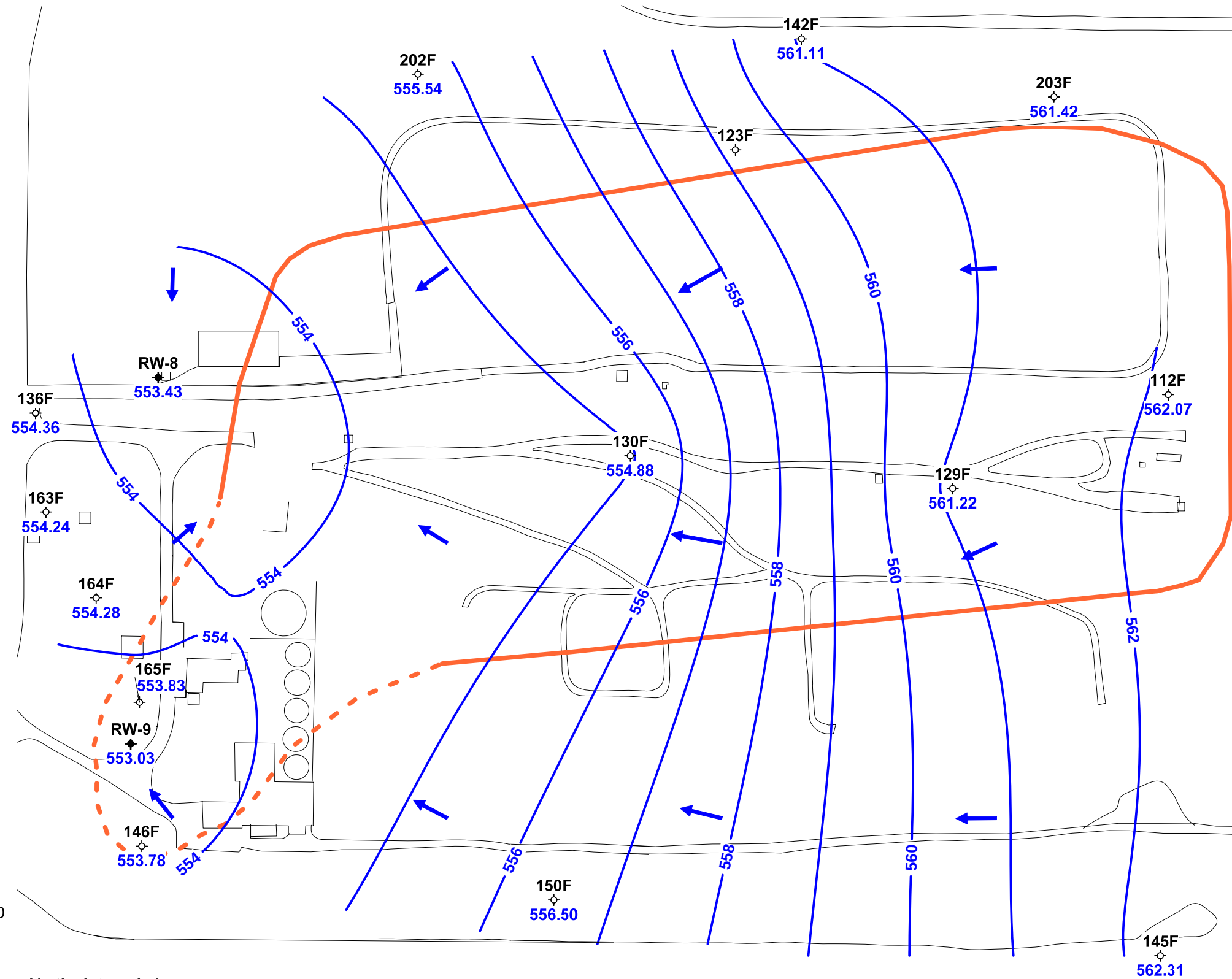
Created by: RBP	Date: 04-05-18
Checked by: JWS	Date: 04-09-18
Project Manager: EAF	Date: 04-09-18
Job number: 450860.02023	

3B	Well ID		Potentiometric Contour		Source Area Extent
	Monitoring Well		Structure		
	Pumping Well		Road		

Figure 11
Potentiometric Surface Map
Chemours Necco Park: E-Zone
March 6, 2018

Figure 12
Select F-Zone Monitoring Wells
Groundwater Elevations 2005 Through 1st Quarter 2018
Chemours Necco Park





Scale: Feet
0 100 200 300 400

Contour interval = 0.5 foot

Elevation datum feet AMSL

148F located downgradient was not used in the interpolation.

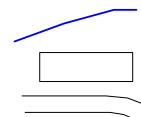
Well 123F was not used in the contouring.

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Checked by: JWS	Date: 04-09-18
Project Manager: EAF	Date: 04-09-18
Job number: 450860.02023	

3B Well ID
Monitoring Well
Pumping Well



LEGEND

Potentiometric Contour
Structure
Road
Source Area Extent

Figure 13
Potentiometric Surface Map
Chemours Necco Park: F-Zone
March 6, 2018

APPENDIX A

CHEMOURS NECCO PARK
GROUNDWATER ELEVATION DATA
FIRST QUARTER 2018

APPENDIX A
GROUNDWATER ELEVATION DATA - 1Q18
Chemours Necco Park

Location ID	Date Measurement	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measurement
102B	03/06/2018	21.52	599.01	577.49	12:34
105C	03/06/2018	Dry	595.28	Dry	12:48
105D	03/06/2018	40.05	594.77	554.72	12:46
111A	03/06/2018	13.88	586.89	573.01	12:01
111B	03/06/2018	12.47	584.94	572.47	11:57
111D	03/06/2018	29.48	584.30	554.82	11:58
112B	03/06/2018	8.25	581.90	573.65	12:22
112C	03/06/2018	16.52	582.93	566.41	12:21
112F	03/06/2018	21.22	583.29	562.07	12:24
115C	03/06/2018	28.40	595.93	567.53	12:58
115D	03/06/2018	41.57	596.62	555.05	12:57
116B	03/06/2018	14.82	590.05	575.23	11:49
118B	03/06/2018	12.98	583.90	570.92	12:26
119A	03/06/2018	11.91	586.34	574.43	12:10
119B	03/06/2018	13.64	586.77	573.13	12:11
120B	03/06/2018	26.07	599.18	573.11	12:46
123A	03/06/2018	21.33	597.93	576.60	12:39
123B	03/06/2018	18.56	595.98	577.42	12:42
123C	03/06/2018	26.26	595.42	569.16	12:43
123D	03/06/2018	36.19	596.51	560.32	12:41
123F	03/06/2018	33.30	598.57	565.27	12:38
129A	03/06/2018	10.39	584.80	574.41	12:16
129B	03/06/2018	13.66	585.24	571.58	12:15
129C	03/06/2018	11.38	585.68	574.30	12:15
129D	03/06/2018	25.57	586.03	560.46	12:14
129E	03/06/2018	19.62	580.88	561.26	12:57
129F	03/06/2018	20.14	581.36	561.22	12:59
130B	03/06/2018	11.71	585.63	573.92	12:06
130C	03/06/2018	20.18	585.51	565.33	12:07
130D	03/06/2018	29.21	584.96	555.75	12:04
130F	03/06/2018	26.61	581.49	554.88	12:20
131A	03/06/2018	14.43	585.43	571.00	12:19
136B	03/06/2018	7.07	581.69	574.62	11:27
136C	03/06/2018	10.04	581.62	571.58	11:26
136D	03/06/2018	24.78	579.68	554.90	11:21
136E	03/06/2018	24.95	579.59	554.64	11:20
136F	03/06/2018	25.97	580.33	554.36	13:03
136F	03/06/2018	25.97	580.33	554.36	11:18
136G	03/06/2018	22.45	579.76	557.31	13:04
136G	03/06/2018	22.38	579.76	557.38	11:19
137A	03/06/2018	6.56	578.47	571.91	11:46
137B	03/06/2018	6.98	578.31	571.33	11:42
137C	03/06/2018	12.87	578.39	565.52	11:40

APPENDIX A
GROUNDWATER ELEVATION DATA - 1Q18
Chemours Necco Park

Location ID	Date Measurement	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measurement
137D	03/06/2018	14.95	579.09	564.14	11:43
138B	03/06/2018	11.01	583.98	572.97	12:30
138C	03/06/2018	22.03	587.06	565.03	12:33
139A	03/06/2018	13.79	585.14	571.35	13:15
139B	03/06/2018	5.38	585.39	580.01	13:16
139C	03/06/2018	22.98	585.27	562.29	13:17
139D	03/06/2018	23.22	585.49	562.27	13:18
140A	03/06/2018	7.72	581.55	573.83	12:28
142E	03/06/2018	24.55	586.00	561.45	12:56
142F	03/06/2018	24.58	585.69	561.11	12:57
145A	03/06/2018	3.09	575.84	572.75	11:59
145B	03/06/2018	5.92	575.48	569.56	11:56
145C	03/06/2018	5.49	575.90	570.41	12:32
145D	03/06/2018	12.10	576.05	563.95	12:29
145E	03/06/2018	13.69	575.98	562.29	11:58
145F	03/06/2018	13.74	576.05	562.31	11:57
146AR	03/06/2018	4.37	576.92	572.55	12:08
146B	03/06/2018	5.93	576.90	570.97	12:11
146C	03/06/2018	6.95	576.35	569.40	12:11
146E	03/06/2018	21.93	576.08	554.15	12:13
146F	03/06/2018	22.26	576.04	553.78	12:12
148D	03/06/2018	7.90	579.38	571.48	11:23
148F	03/06/2018	24.35	576.21	551.86	11:24
149B	03/06/2018	2.45	572.87	570.42	11:40
149C	03/06/2018	4.57	573.26	568.69	11:41
149D	03/06/2018	18.13	572.86	554.73	11:41
150A	03/06/2018	3.33	575.86	572.53	11:47
150B	03/06/2018	4.99	575.99	571.00	11:48
150C	03/06/2018	9.74	576.13	566.39	11:49
150E	03/06/2018	19.40	576.15	556.75	11:49
150F	03/06/2018	19.48	575.98	556.50	11:51
151B	03/06/2018	5.83	573.36	567.53	11:32
151C	03/06/2018	4.02	573.18	569.16	11:33
158D	03/06/2018	36.93	598.20	561.27	12:32
159A	03/06/2018	18.49	596.16	577.67	12:51
159B	03/06/2018	23.73	596.37	572.64	12:52
159C	03/06/2018	26.79	597.36	570.57	12:54
159D	03/06/2018	43.05	597.67	554.62	12:54
160B	03/06/2018	12.32	582.75	570.43	12:27
160C	03/06/2018	19.00	582.72	563.72	12:28
161B	03/06/2018	10.60	582.84	572.24	13:13
161C	03/06/2018	20.72	582.64	561.92	13:12

APPENDIX A
GROUNDWATER ELEVATION DATA - 1Q18
Chemours Necco Park

Location ID	Date Measurement	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measurement
162C	03/06/2018	16.31	581.00	564.69	12:47
163A	03/06/2018	4.41	578.14	573.73	11:42
163B	03/06/2018	4.39	577.94	573.55	11:43
163D	03/06/2018	20.94	578.82	557.88	11:40
163E	03/06/2018	21.93	579.06	557.13	11:40
163F	03/06/2018	24.52	578.76	554.24	11:41
164D	03/06/2018	20.95	577.42	556.47	11:36
164E	03/06/2018	23.06	577.32	554.26	11:36
164F	03/06/2018	22.99	577.27	554.28	11:35
165D	03/06/2018	13.49	577.52	564.03	12:41
165E	03/06/2018	23.38	577.56	554.18	12:40
165F	03/06/2018	23.89	577.72	553.83	12:39
167B	03/06/2018	10.50	580.93	570.43	13:04
168A	03/06/2018	5.68	578.72	573.04	12:17
168B	03/06/2018	12.12	578.90	566.78	12:18
168C	03/06/2018	13.83	579.21	565.38	12:19
169B	03/06/2018	10.54	580.43	569.89	12:23
170B	03/06/2018	10.53	579.10	568.57	12:24
171B	03/06/2018	9.14	579.54	570.40	12:26
172B	03/06/2018	6.88	576.95	570.07	12:00
173A	03/06/2018	7.25	580.71	573.46	12:13
174A	03/06/2018	4.34	577.62	573.28	13:29
175A	03/06/2018	11.02	586.81	575.79	11:53
176A	03/06/2018	6.57	580.03	573.46	12:00
178A	03/06/2018	6.38	579.92	573.54	12:09
179A	03/06/2018	5.80	579.01	573.21	11:57
184A	03/06/2018	6.34	579.88	573.54	12:19
185A	03/06/2018	6.98	580.84	573.86	12:28
186A	03/06/2018	10.01	579.76	569.75	12:35
187A	03/06/2018	9.25	579.94	570.69	12:36
188A	03/06/2018	13.20	580.91	567.71	12:42
189A	03/06/2018	10.06	579.82	569.76	12:49
190A	03/06/2018	10.81	580.58	569.77	13:01
191AR	03/06/2018	8.61	580.62	572.01	13:06
192A	03/06/2018	9.98	584.08	574.10	13:14
193A	03/06/2018	10.70	584.13	573.43	13:22
194A	03/06/2018	12.55	584.35	571.80	13:20
201B	03/06/2018	8.68	579.25	570.57	11:59
202D	03/06/2018	37.48	592.73	555.25	13:47
202E	03/06/2018	37.82	592.73	554.91	13:47
202F	03/06/2018	37.19	592.73	555.54	13:48
203D	03/06/2018	32.74	593.85	561.11	13:36

APPENDIX A
GROUNDWATER ELEVATION DATA - 1Q18
Chemours Necco Park

Location ID	Date Measurement	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measurement
203E	03/06/2018	32.61	593.85	561.24	13:41
203F	03/06/2018	32.43	593.85	561.42	13:41
204C	03/06/2018	19.31	581.77	562.46	13:23
BZTW-1	03/06/2018	7.15	579.67	572.52	12:27
BZTW-2	03/06/2018	6.11	579.38	573.27	12:11
BZTW-4	03/06/2018	4.02	578.18	574.16	11:32
D-10	03/06/2018	14.76	580.02	565.26	12:25
D-11	03/06/2018	4.59	578.07	573.48	12:06
D-13	03/06/2018	5.59	579.07	573.48	11:51
D-14	03/06/2018	13.47	579.01	565.54	11:50
D-23	03/06/2018	11.72	580.61	568.89	12:54
D-9	03/06/2018	6.95	580.15	573.20	12:23
PZ-205B	03/06/2018	6.50	579.38	572.88	12:08
PZ-A	03/06/2018	7.12	579.06	571.94	12:03
PZ-B	03/06/2018	8.09	579.47	571.38	12:02
RDB-3	03/06/2018	4.76	579.31	574.55	11:29
RDB-5	03/06/2018	4.30	578.57	574.27	11:31
RW-11	03/06/2018	16.51	578.78	562.27	11:55
RW-4	03/06/2018	24.56	581.52	556.96	13:19
RW-5	03/06/2018	15.18	578.88	563.70	12:46
RW-8	03/06/2018	32.09	585.52	553.43	11:50
RW-9	03/06/2018	22.10	575.13	553.03	12:37
TRW-6	03/06/2018	7.24	580.21	572.97	12:14
TRW-7	03/06/2018	5.67	577.89	572.22	13:30

APPENDIX B

CHEMOURS NECCO PARK
GWTF PROCESS SAMPLING RESULTS
FIRST QUARTER 2018

Appendix B
Summary of Analytical Results
Chemours Necco Park
First Quarter 2018

Method	CAS #	Parameter Name	Location Date Units	BC-INFLUENT 3/6/2018 FS	DEF-INFLUENT 3/6/2018 FS	COMB-EFFLUENT 3/6/2018 FS	TB 3/6/2018 TB
		Field Parameters					
		COLOR	NONE	CLEAR	LT GREY	CLEAR	
		ODOR	NONE	Yes	Yes	Yes	
		OXIDATION REDUCTION POTENTIAL	MV	-171	-235	-228	
		PH	STD UNITS	6.28	7.24	7.94	
		SPECIFIC CONDUCTANCE	UMHOS/CM	6433	4450	4388	
		TEMPERATURE	DEGREES C	11.9	12.3	13.9	
		TURBIDITY QUANTITATIVE	NTU	6.5	36.4	13.8	
		Volatile Organics					
8260C	79-34-5	1,1,2,2-Tetrachloroethane	UG/L	4700	1400	1100	<0.32
8260C	79-00-5	1,1,2-Trichloroethane	UG/L	2500	2300	470	<0.34
8260C	75-35-4	1,1-Dichloroethene	UG/L	<450	<220	<14	<0.27
8260C	107-06-2	1,2-Dichloroethane	UG/L	600 J	<250	36 J	<0.3
8260C	56-23-5	Carbon Tetrachloride	UG/L	7500	850	<18	<0.35
8260C	67-66-3	Chloroform	UG/L	18000	2700	150	<0.31
8260C	156-59-2	cis-1,2 Dichloroethene	UG/L	11000	11000	180	<0.3
8260C	75-09-2	Methylene Chloride	UG/L	3600	4700	130	<0.53
8260C	127-18-4	Tetrachloroethene	UG/L	10000	740 J	17 J	<0.3
8260C	156-60-5	trans-1,2-Dichloroethene	UG/L	<480	680 J	<15	<0.29
8260C	79-01-6	Trichloroethene	UG/L	15000	4000	50	<0.33
8260C	75-01-4	Vinyl Chloride	UG/L	2700	1600	<23	<0.45
		Total VOCs	UG/L	75600	29970	2133	0

< Not detected at stated reporting limit

J Estimated concentration