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November 21, 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 THIRD QUARTER 2018 DATA PACKAGE

Enclosed is the *Third Quarter 2018 (3Q18) 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 3Q18 monitoring summary for dense non-aqueous phase liquid (DNAPL).

Pumping system uptime for 3Q18 was 82.9 percent. The total volume of groundwater treated during 3Q18 was 3,081,012 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".

Paul F. Mazierski
Project Director

Enc. 3Q2018 Data Package

cc: Stanley Radon/NYSDEC
E. Felter/Parsons



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

EPA ID No. NYD980532162

Prepared For:

**THE CHEMOOURS 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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November 2018

TABLE OF CONTENTS

	Page
SECTION 1 DATA PACKAGE SUMMARY.....	1-1
1.1 Introduction.....	1-1
1.2 Operational Summary.....	1-1
1.3 GWTF Process Sampling	1-2
1.4 POTW Compliance.....	1-2

SECTION 2 REFERENCES.....	2-1
----------------------------------	------------

TABLES

FIGURES

APPENDIX A - GROUNDWATER ELEVATION DATA THIRD QUARTER 2018

APPENDIX B - GWTF PROCESS SAMPLING RESULTS THIRD QUARTER 2018

ATTACHMENT 1 - 3Q18 WATER LEVELS (ELECTRONIC FORMAT ONLY)

SECTION 1

DATA PACKAGE SUMMARY

1.1 INTRODUCTION

This data package presents a summary of operating and monitoring data collected during the third quarter of 2018 (3Q18) 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 53rd 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 (GWT). 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 3Q18:

	HCS Uptime (%)	Groundwater Treated (gallons)	DNAPL Removed (gallons)
July	78.7%	978,944	0
August	89.9%	1,088,863	0
September	80.2%	1,013,205	0
3Q18 Total	82.9%	3,081,012	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 was one unscheduled and one scheduled HCS down time events during the quarter. A power failure between July 7 and July 12 caused an unscheduled shut down of the HSC for 117 hours. Well cleaning and preventative maintenance from the 18th of September through the 24th resulted in the scheduled HCS downtime: RW-5 was down between September 18 and 24 for a total of 143.5 hours and RW-11 was down between September 19 and 24 for 117 hours.

There were four unscheduled individual well shutdown events during the quarter. The unscheduled individual well shutdown events included the following:

- RW-4 between June 29 and July 2 for 61.5 hours due to a flowmeter malfunction;

- RW-8 between August 3 and 6 for 65 hours due to a flowmeter malfunction;
- RW-5 between September 1 and 4 for 71 hours due to a pump failure; and
- RW-9 between September 1 and 4 for 61 hours due to a level probe malfunction.

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 locations were monitored on July 30, August 30, and September 28. No recoverable DNAPL was observed during the monitoring for this quarter, as such, no DNAPL was removed.

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 3Q18 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 August 22, 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 3Q18 sewer discharge samples were collected on July 18, 2018 (following NFWB quarterly calendar). There were no permit limit exceedances in 3Q18. The results indicate that the GWTF continued operating within normal parameters during 3Q18.

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 3Q18
Chemours Necco Park

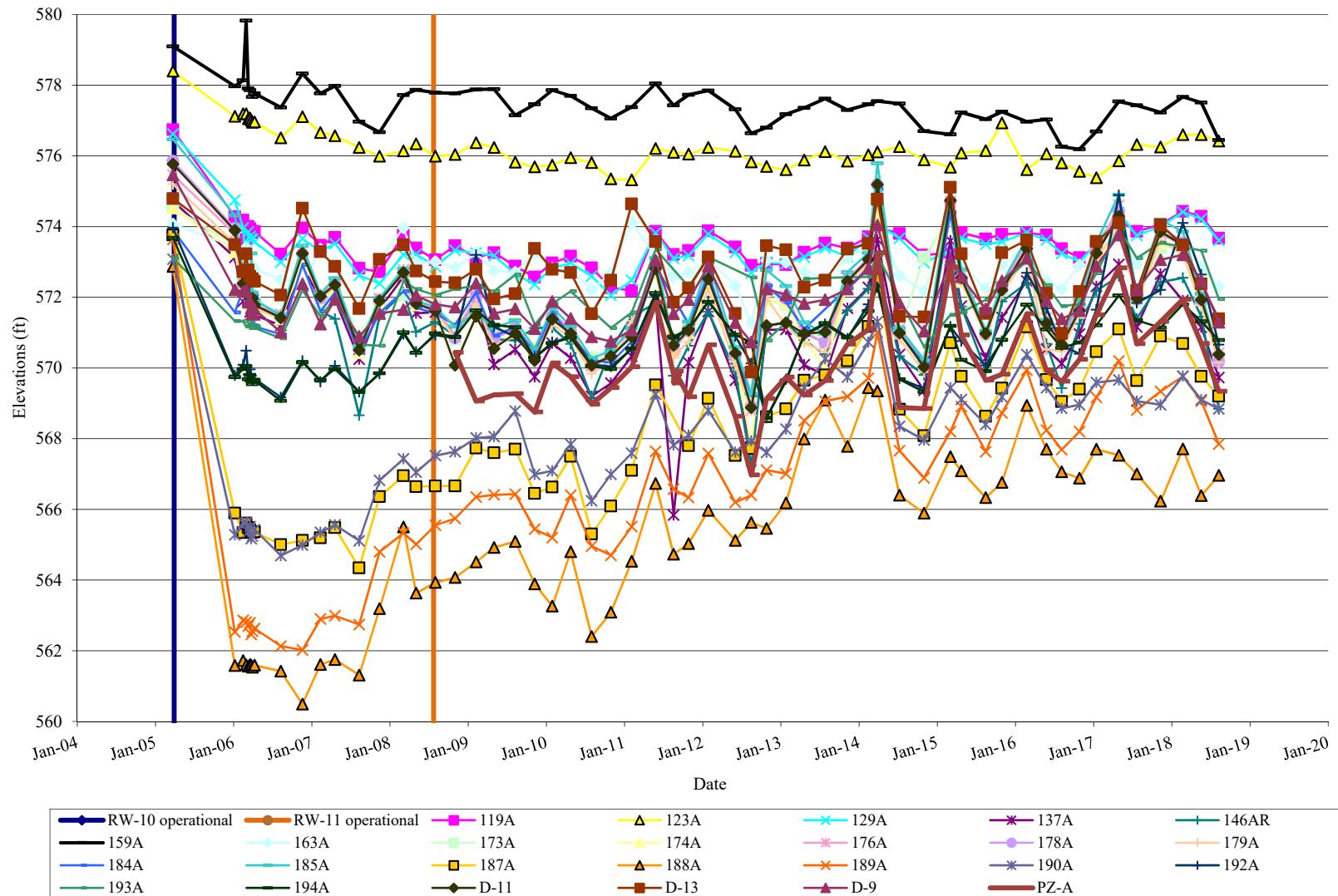
	Well ID	Date(s)	Length of Shutdown (hours)	Reason for Shutdown	Remarks
July	RW-4	June 29 through July 2	61.5	Flow meter malfunction	
	RW-4, 5, 8, 9, and 11	July 7 through July 12	117	Power failure	
August	RW-8	August 3 through August 6	65	Flow meter malfunction	
September	RW-5	September 1 through September 4	71	Pump failure	
	RW-9	September 1 through September 4	61	Level probe malfunction	
	RW-5	September 18 through September 24	143.5	Well cleaning	
	RW-11	September 19 through September 24	117	Well cleaning	

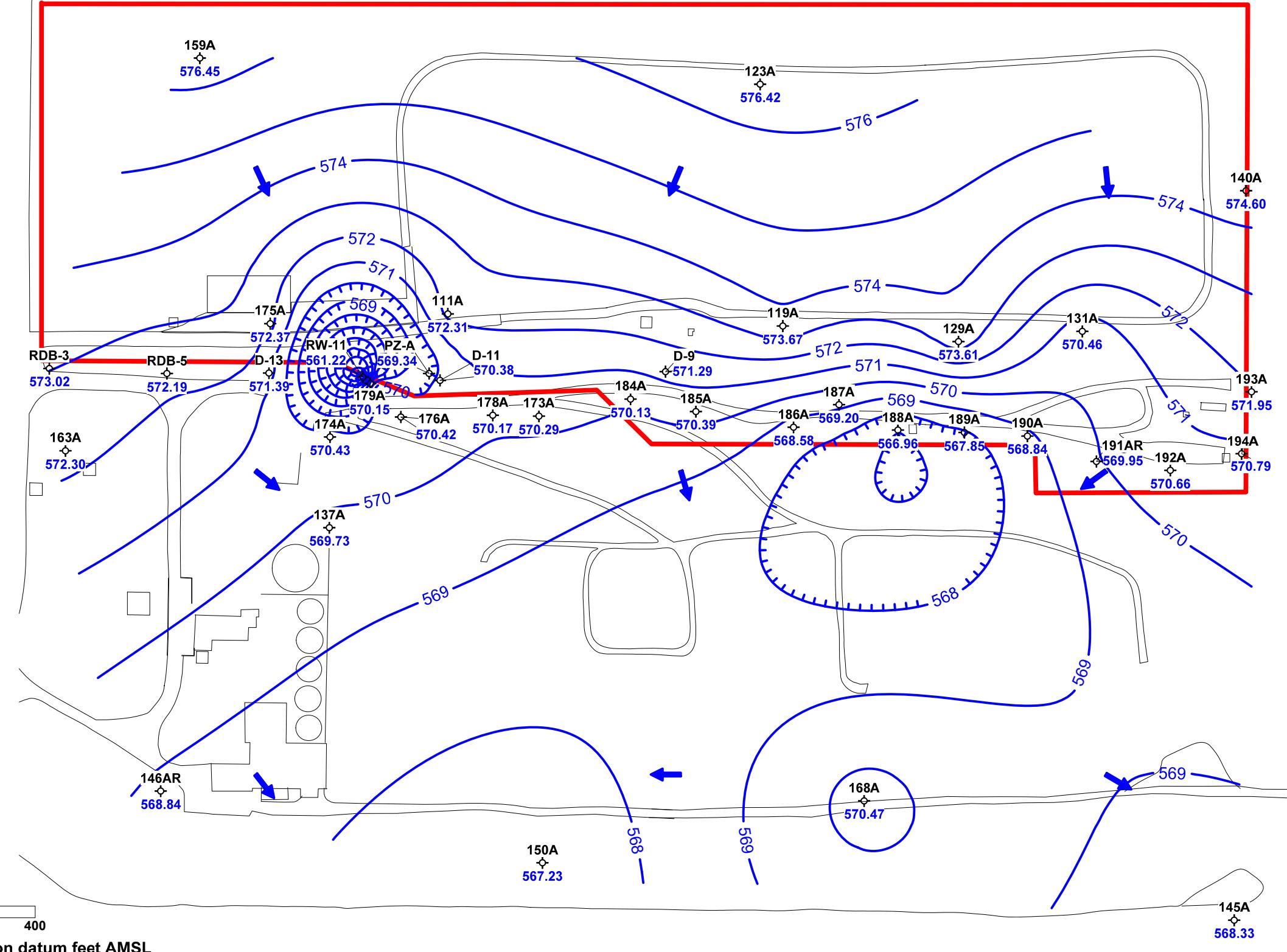
Table 2
Historical HCS Operational Summary - 3Q18
Chemours Necco Park

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
2Q18	80.8	96.9	3,314,346	0
3Q18	82.9	88.2	3,081,012	0
TOTALS	---	---	183,363,309	1,402
AVERAGE	86.7	93.9	---	---

FIGURES

Figure 1
Select A-Zone Monitoring Wells
Groundwater Elevations 2005 Through 3rd Quarter 2018
Chemours Necco Park





PARSONS
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Created by: RBP	Date: 10-02-18
Checked by: JWS	Date: 10-05-18
Project Manager: EA	Date: 10-05-18
Job number: 450860.02023	

LEGEND

- 3B Well ID
◊ Monitoring Well
◆ Pumping Well
— Potentiometric Contour
— Source Area Extent
□ Structure
— Road

Figure 2
Potentiometric Surface Map
Chemours Necco Park: A-Zone
August 21, 2018



159A/B
-0.32

111A/B
-0.20

119A/B
-0.10

129A/B
-0.17

163A/B
-0.02

137A/B
-0.04

168A/B
-0.30

150A/B
0.16

145A/B
-0.00

Scale: Feet



Negative value indicates downward gradient

Elevation datum feet AMSL

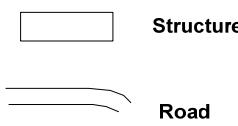
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Checked by: JWS	Date: 10-05-18
Project Manager: EAF	Date: 10-05-18
Job number: 450860.02023	

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

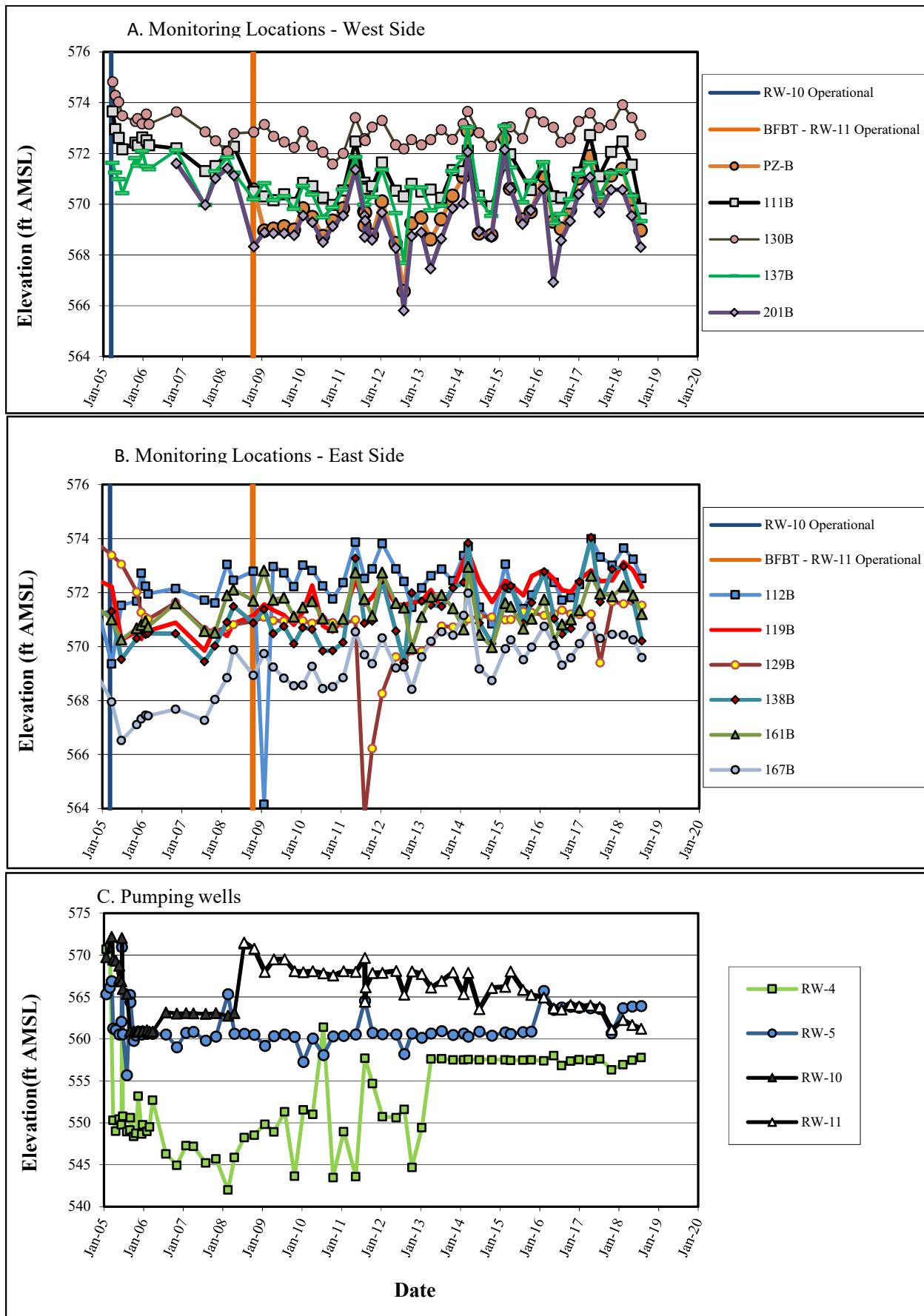
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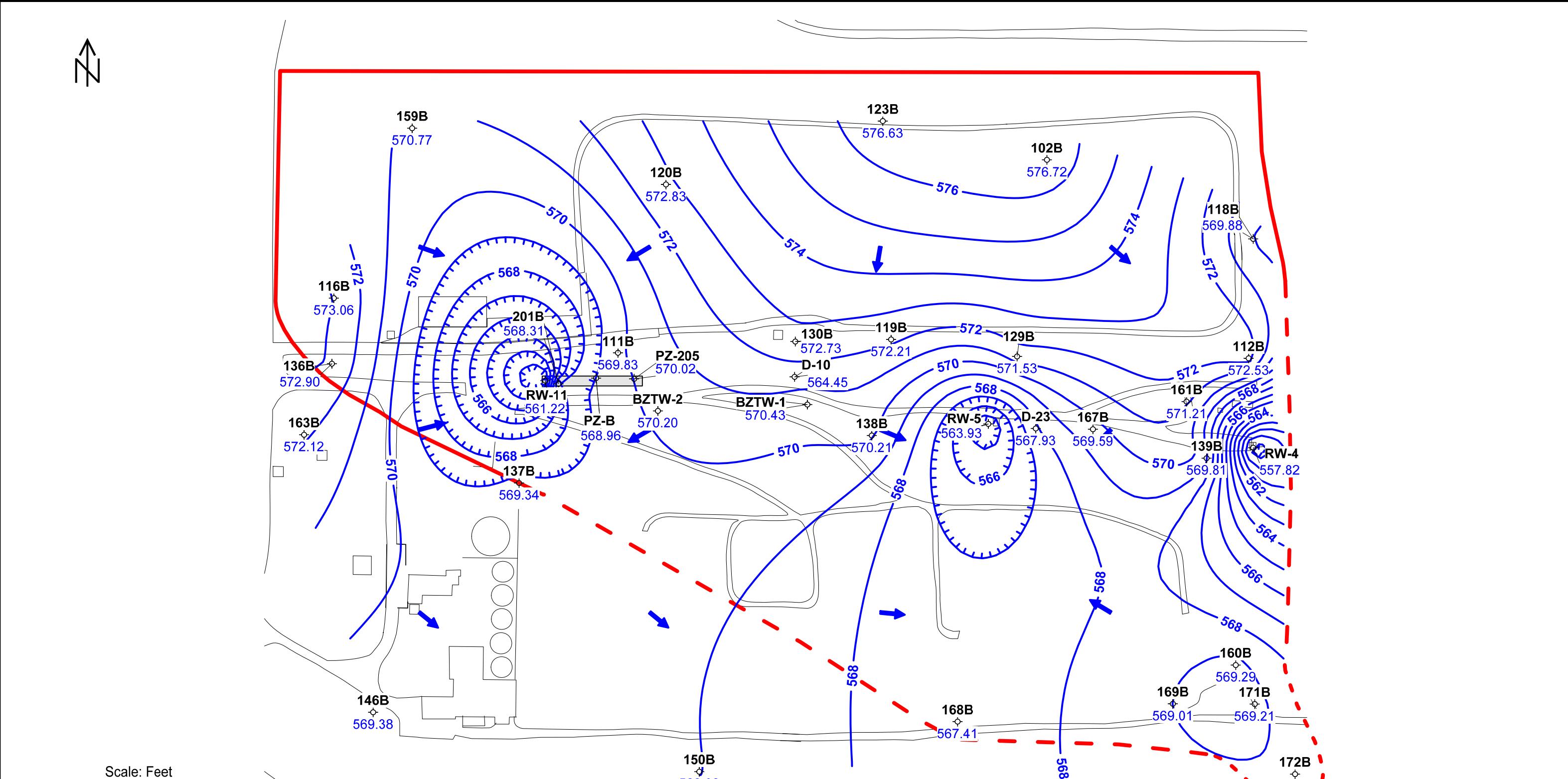


-0.10 Vertical Hydraulic Gradient

Figure 3
Vertical Gradient: A-Zone to B-Zone
Chemours Necco Park
August 21, 2018

Figure 4
Select B-Zone Monitoring Wells
Groundwater Elevations 2005 through 3rd Quarter 2018
Chemours Necco Park





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Project Manager: EAF	Date: 10-05-18
Job number: 450860.02023	

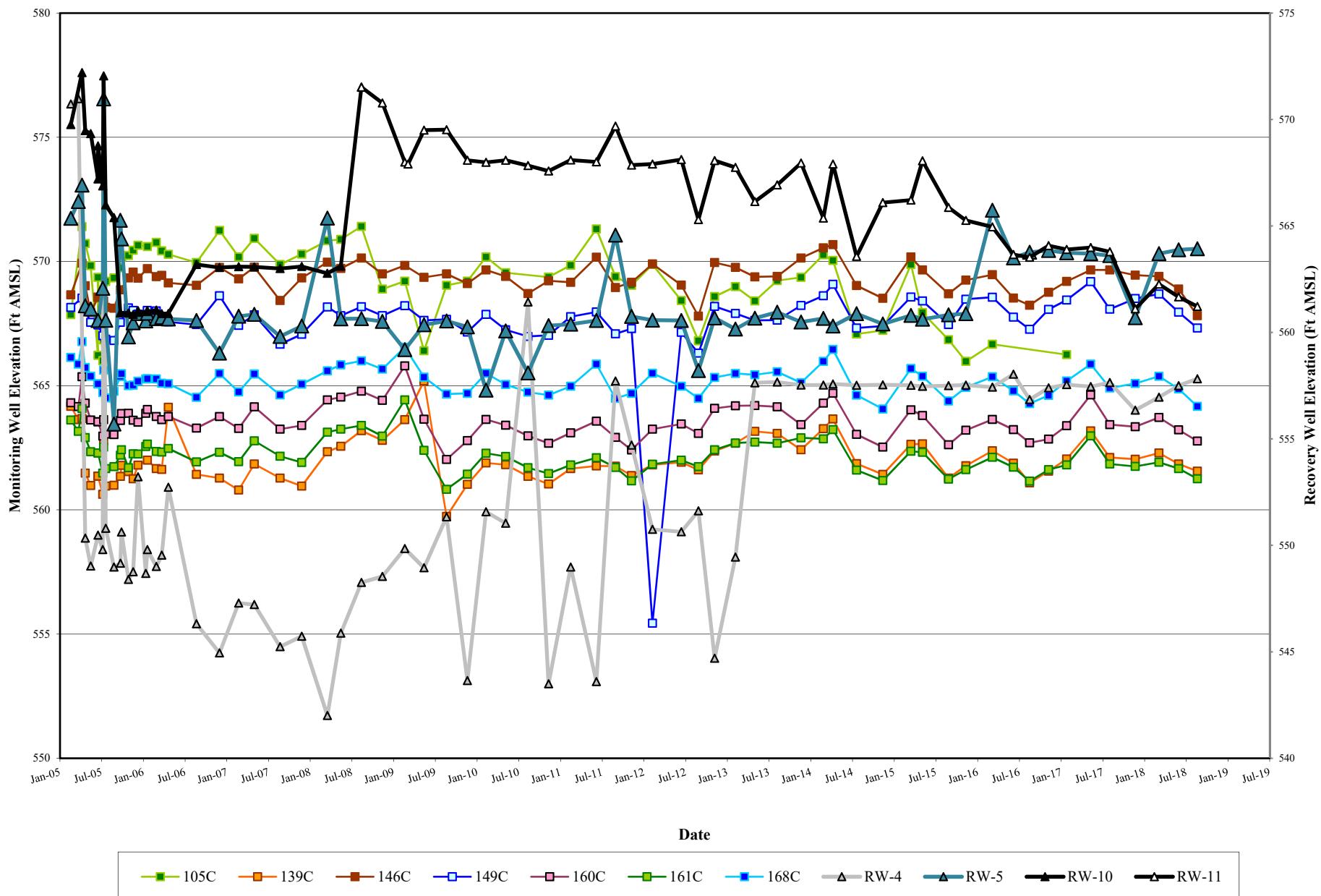
- 3B Well ID
◇ Monitoring Well
◆ Pumping Well

LEGEND

- Potentiometric Contour
Structure
Road
Source Area Extent
Approximate Location of Bedrock Fractured Blast Trench

Figure 5
Potentiometric Surface Map
Chemours Necco Park: B-Zone
August 21, 2018

Figure 6
Select C-Zone Monitoring Wells
Groundwater Elevations 2005 Through 3rd Quarter 2018
Chemours Necco Park



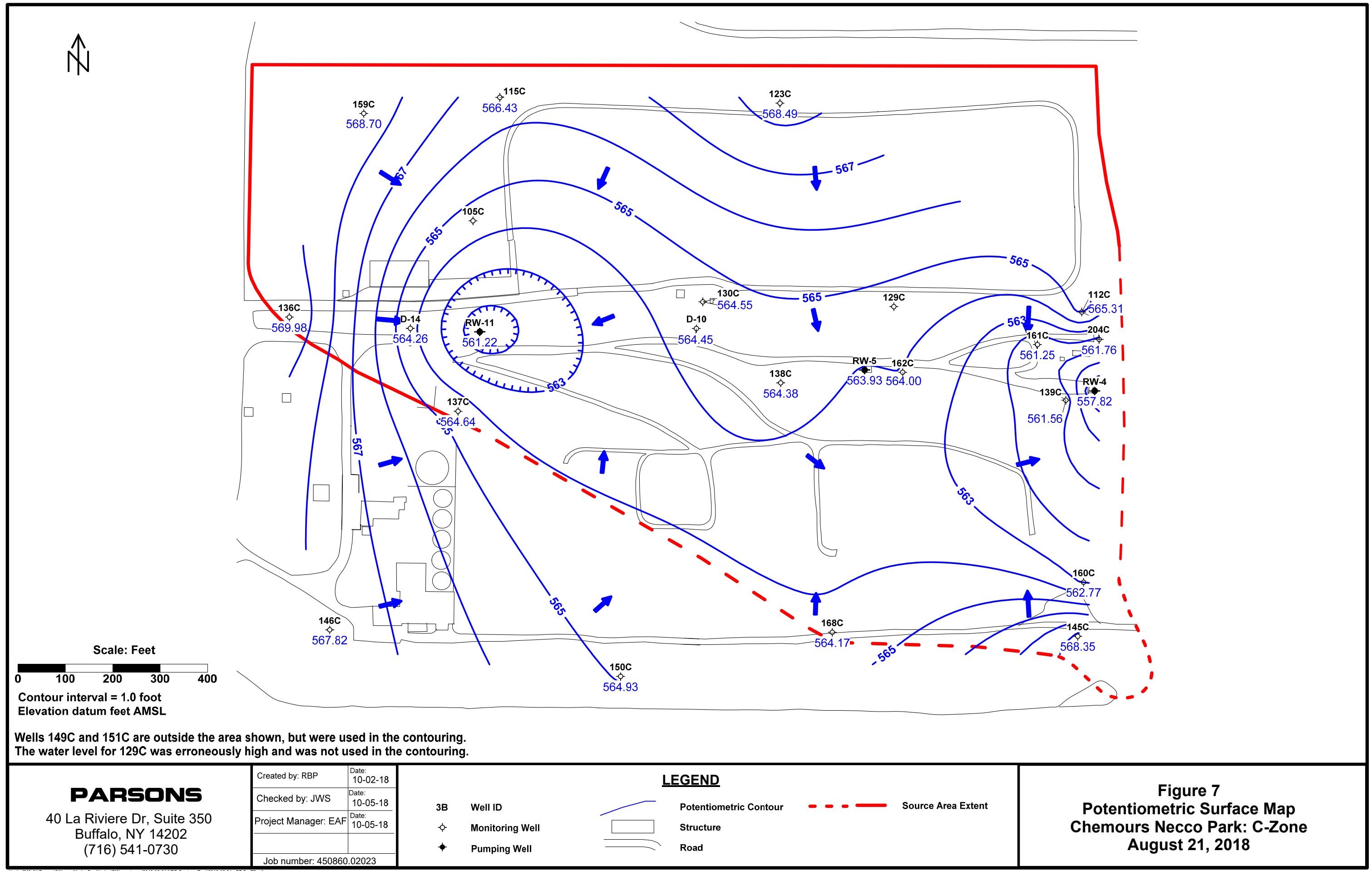
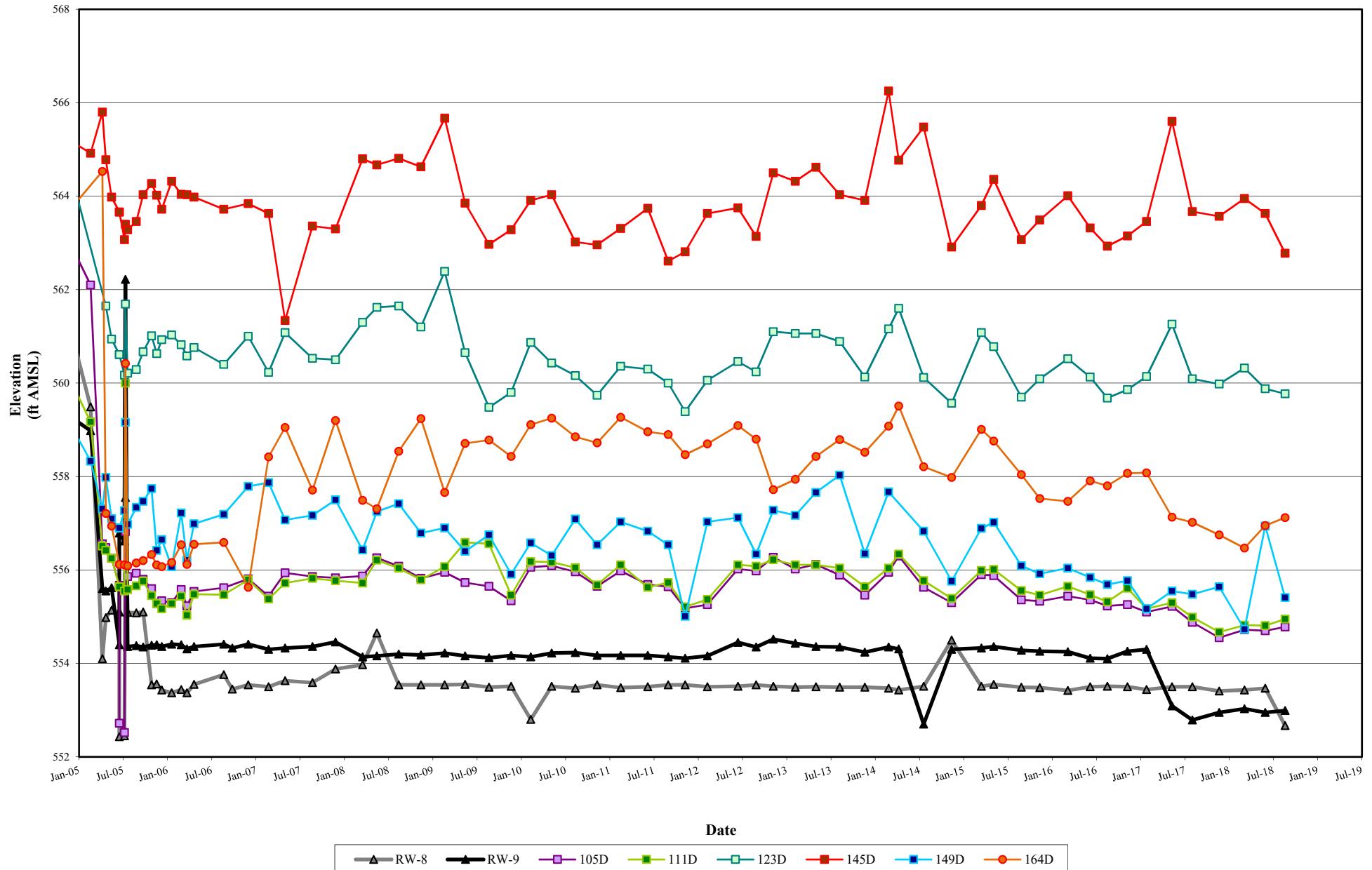
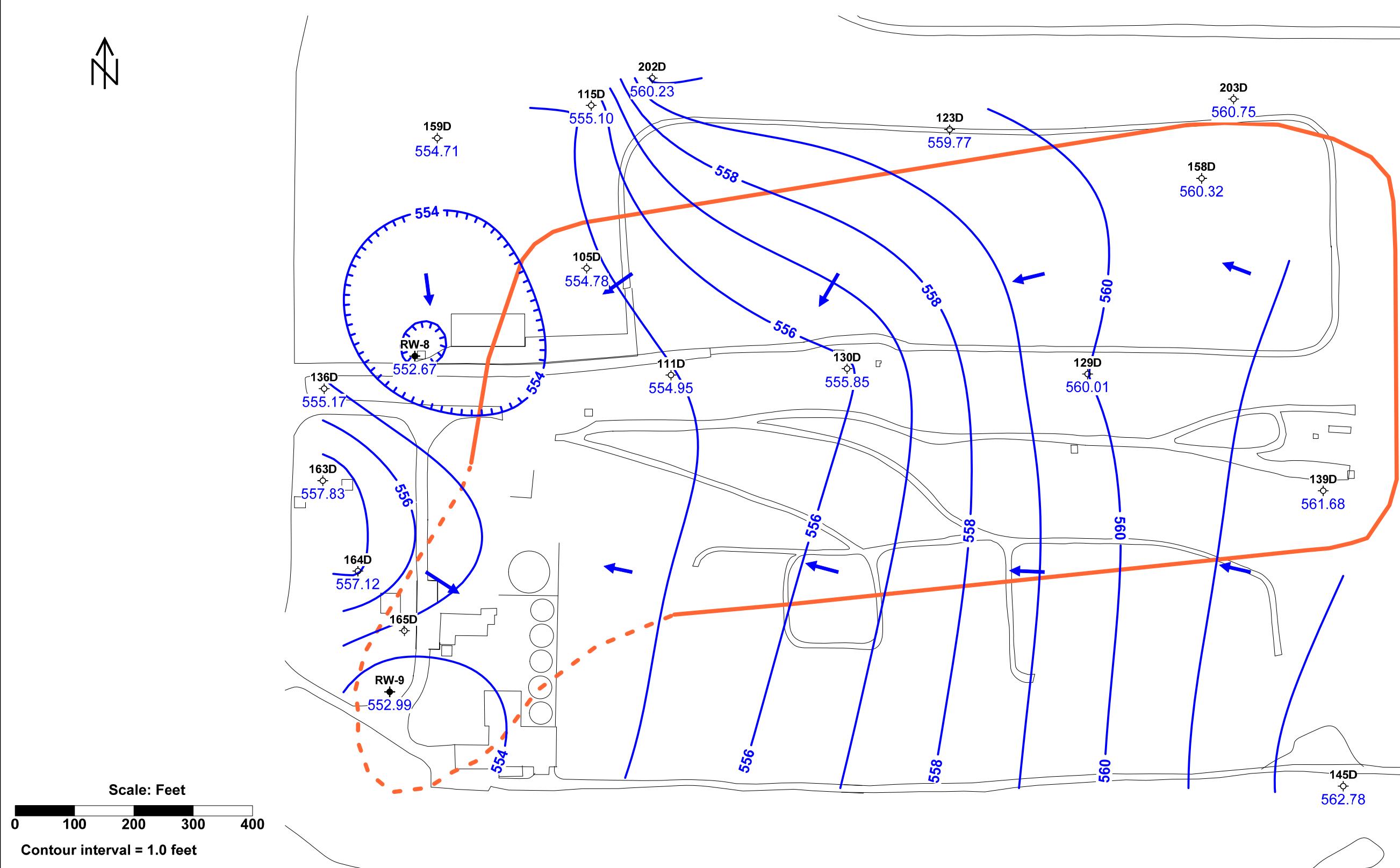


Figure 8
Select D-Zone Monitoring Wells
Groundwater Elevations 2005 through 3rd Quarter 2018
Chemours Necco Park





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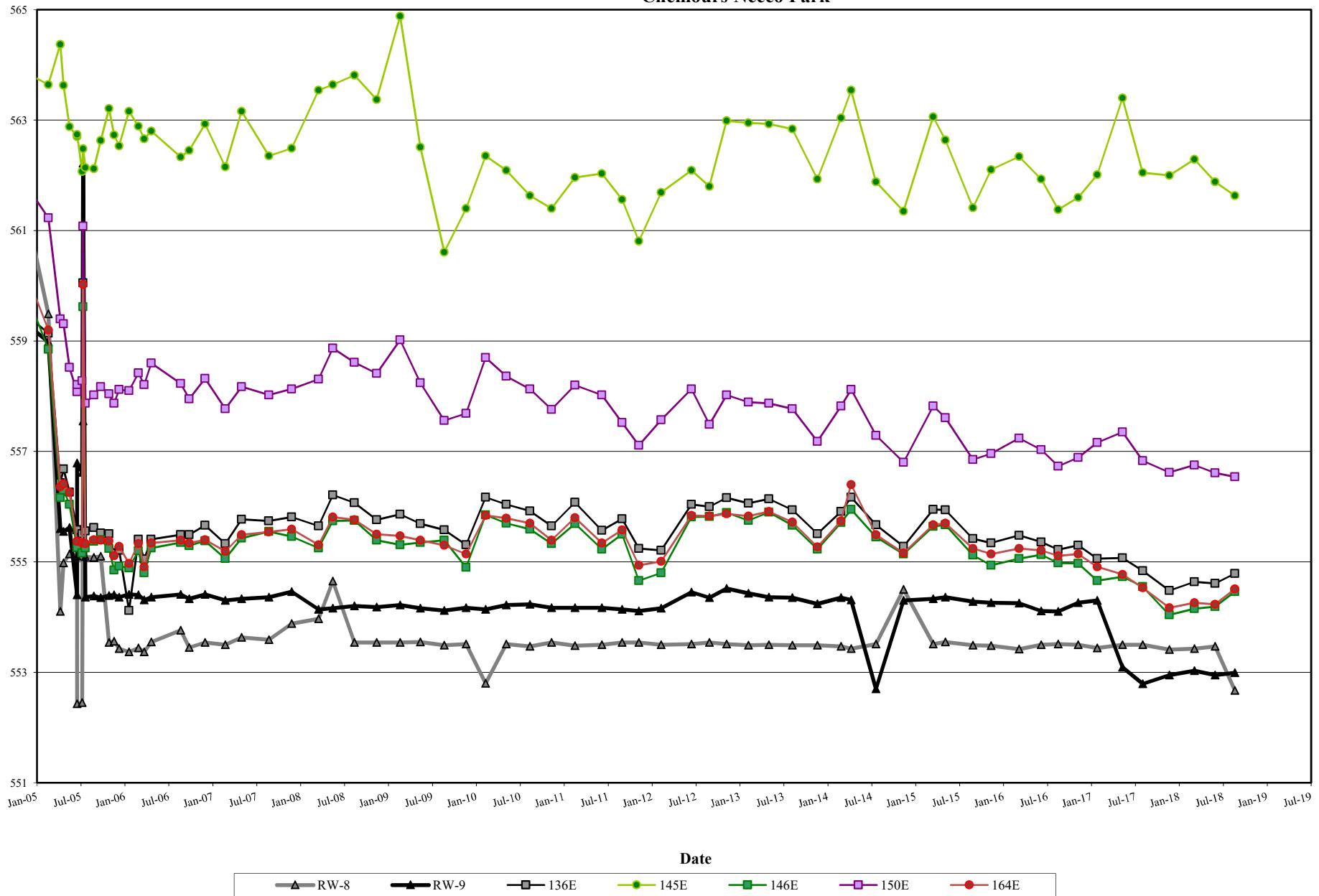
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Checked by: JWS	Date: 10-05-18
Project Manager: EAF	Date: 10-05-18
Job number: 450860.02023	

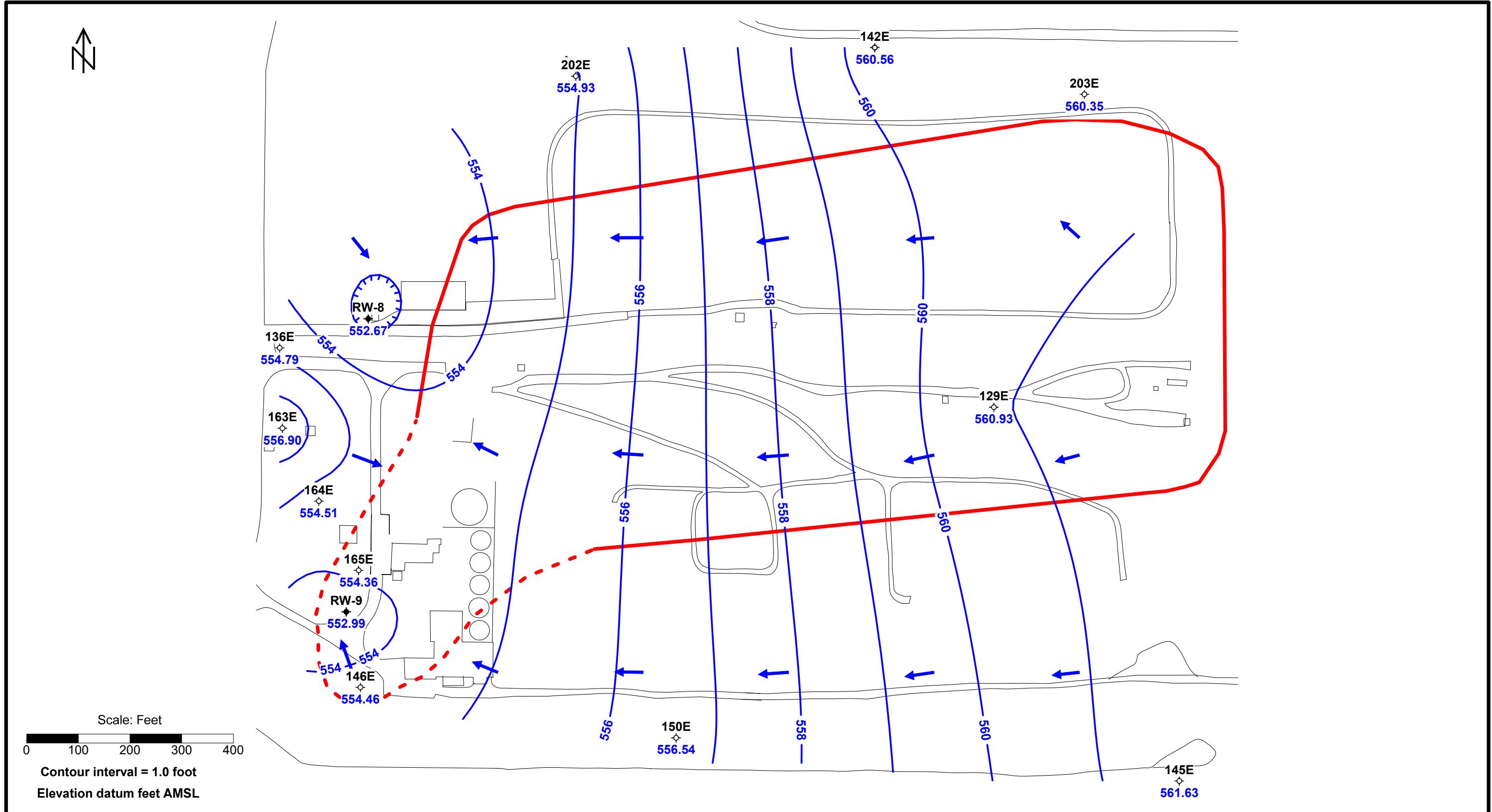
LEGEND

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

Figure 9
Potentiometric Surface Map
Chemours Necco Park: D-Zone
August 21, 2018

Figure 10
Select E-Zone Monitoring Wells
Groundwater Elevations 2005 Through 3rd Quarter 2018
Chemours Necco Park



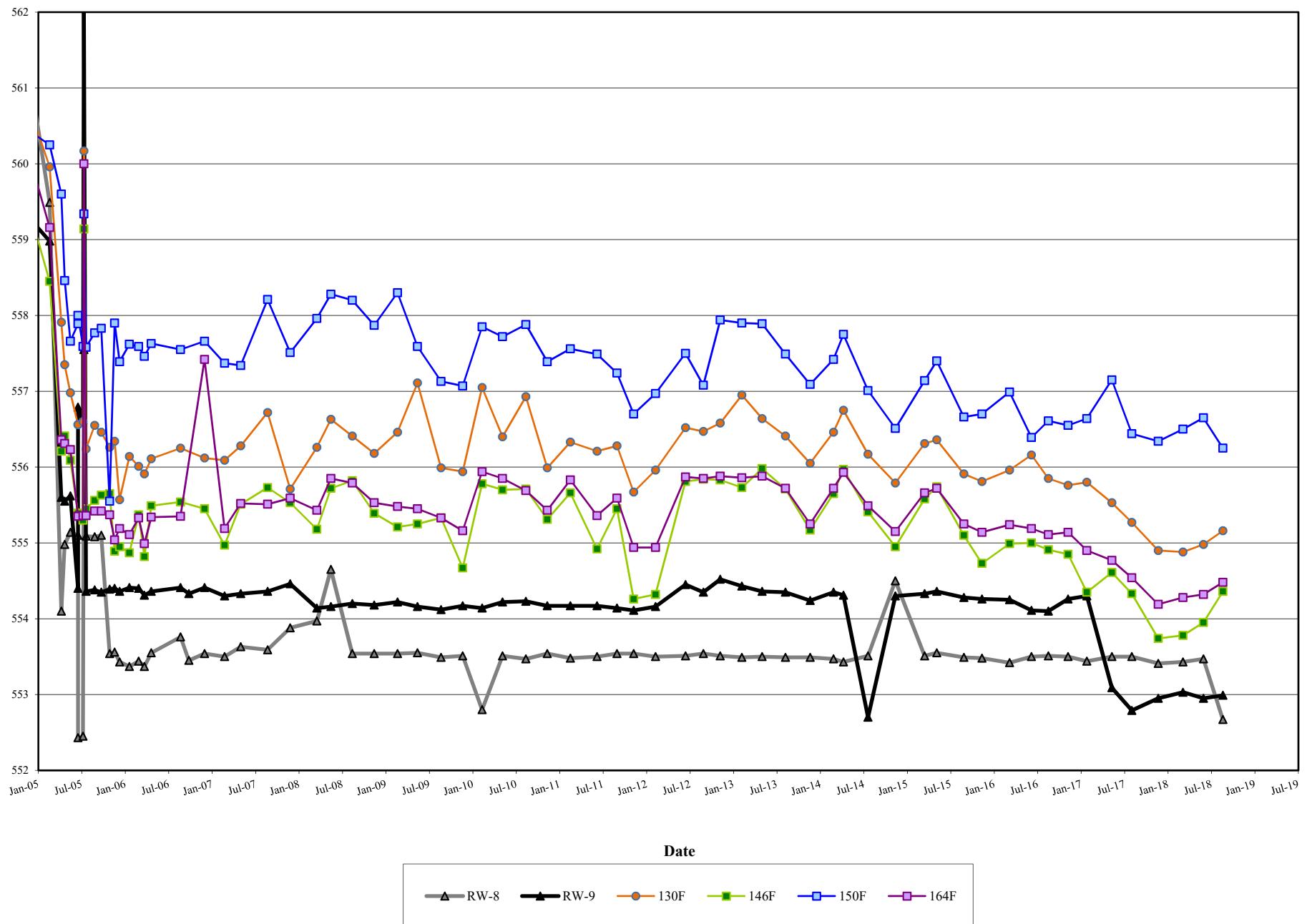


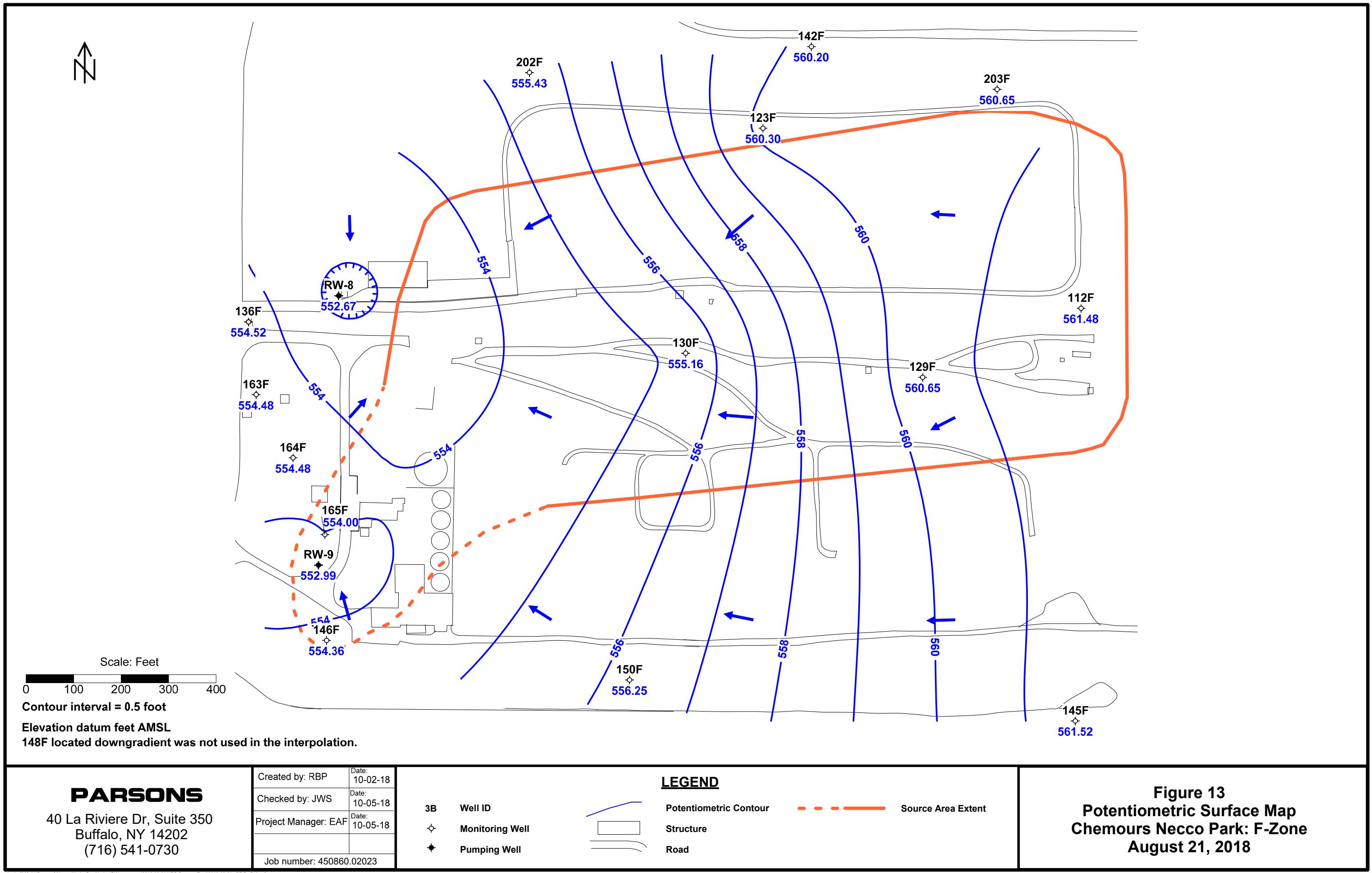
LEGEND

- Potentiometric Contour
- Monitoring Well
- Pumping Well
- Structure
- Road

Figure 11
Potentiometric Surface Map
Chemours Necco Park: E-Zone
August 21, 2018

Figure 12
Select F-Zone Monitoring Wells
Groundwater Elevations 2005 Through 3rd Quarter 2018
Chemours Necco Park





APPENDIX A

CHEMOOURS NECCO PARK
GROUNDWATER ELEVATION DATA
THIRD QUARTER 2018

APPENDIX A
GROUNDWATER ELEVATION DATA - 3Q18
Chemours Necco Park

Location ID	Date Measurement	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measured
102B	08/21/2018	22.29	599.01	576.72	13:47
105C	08/21/2018	Dry	595.28	-	14:12
105D	08/21/2018	39.99	594.77	554.78	14:12
111A	08/21/2018	14.58	586.89	572.31	12:54
111B	08/21/2018	15.11	584.94	569.83	12:57
111D	08/21/2018	29.35	584.30	554.95	12:59
112B	08/21/2018	9.37	581.90	572.53	13:32
112C	08/21/2018	17.62	582.93	565.31	13:33
112F	08/21/2018	21.81	583.29	561.48	13:30
115C	08/21/2018	29.50	595.93	566.43	14:31
115D	08/21/2018	41.52	596.62	555.10	14:31
116B	08/21/2018	16.99	590.05	573.06	12:39
118B	08/21/2018	14.02	583.90	569.88	13:38
119A	08/21/2018	12.67	586.34	573.67	13:10
119B	08/21/2018	14.56	586.77	572.21	13:13
120B	08/21/2018	26.35	599.18	572.83	14:02
123A	08/21/2018	21.51	597.93	576.42	13:52
123B	08/21/2018	19.35	595.98	576.63	13:57
123C	08/21/2018	26.93	595.42	568.49	13:55
123D	08/21/2018	36.74	596.51	559.77	13:54
123F	08/21/2018	38.27	598.57	560.30	13:50
129A	08/21/2018	11.19	584.80	573.61	13:22
129B	08/21/2018	13.71	585.24	571.53	13:20
129C	08/21/2018	11.59	585.68	574.09	13:21
129D	08/21/2018	26.02	586.03	560.01	13:18
129E	08/21/2018	19.95	580.88	560.93	13:19
129F	08/21/2018	20.71	581.36	560.65	13:16
130B	08/21/2018	12.90	585.63	572.73	13:04
130C	08/21/2018	20.96	585.51	564.55	13:06
130D	08/21/2018	29.11	584.96	555.85	13:05
130F	08/21/2018	26.33	581.49	555.16	12:51
131A	08/21/2018	14.97	585.43	570.46	13:27
136B	08/21/2018	8.79	581.69	572.90	12:06
136C	08/21/2018	11.64	581.62	569.98	12:04
136D	08/21/2018	24.51	579.68	555.17	12:03
136E	08/21/2018	24.80	579.59	554.79	12:01
136F	08/21/2018	25.81	580.33	554.52	11:30
136F	08/21/2018	25.74	580.33	554.59	14:18
136G	08/21/2018	21.19	579.76	558.57	11:59
137A	08/21/2018	8.74	578.47	569.73	12:00
137B	08/21/2018	8.97	578.31	569.34	12:04
137C	08/21/2018	13.75	578.39	564.64	12:06

APPENDIX A
GROUNDWATER ELEVATION DATA - 3Q18
Chemours Necco Park

Location ID	Date Measurement	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measured
137D	08/21/2018	16.11	579.09	562.98	12:03
138B	08/21/2018	13.77	583.98	570.21	13:02
138C	08/21/2018	22.68	587.06	564.38	13:04
139A	08/21/2018	13.63	585.14	571.51	13:40
139B	08/21/2018	15.58	585.39	569.81	13:43
139C	08/21/2018	23.71	585.27	561.56	13:45
139D	08/21/2018	23.81	585.49	561.68	13:47
140A	08/21/2018	6.95	581.55	574.60	14:35
142E	08/21/2018	25.44	586.00	560.56	14:45
142F	08/21/2018	25.49	585.69	560.20	14:47
145A	08/21/2018	7.51	575.84	568.33	12:51
145B	08/21/2018	7.17	575.48	568.31	12:48
145C	08/21/2018	7.55	575.90	568.35	13:40
145D	08/21/2018	13.27	576.05	562.78	13:40
145E	08/21/2018	14.35	575.98	561.63	12:53
145F	08/21/2018	14.53	576.05	561.52	12:55
146AR	08/21/2018	8.08	576.92	568.84	13:07
146B	08/21/2018	7.52	576.90	569.38	13:08
146C	08/21/2018	8.53	576.35	567.82	13:10
146E	08/21/2018	21.62	576.08	554.46	13:11
146F	08/21/2018	21.68	576.04	554.36	13:12
148D	08/21/2018	11.64	579.38	567.74	11:51
148F	08/21/2018	22.38	576.21	553.83	11:49
149B	08/21/2018	3.54	572.87	569.33	12:18
149C	08/21/2018	5.94	573.26	567.32	12:20
149D	08/21/2018	17.45	572.86	555.41	12:23
150A	08/21/2018	8.63	575.86	567.23	12:35
150B	08/21/2018	6.96	575.99	569.03	12:35
150C	08/21/2018	11.20	576.13	564.93	12:37
150E	08/21/2018	19.61	576.15	556.54	12:38
150F	08/21/2018	19.73	575.98	556.25	12:40
151B	08/21/2018	6.99	573.36	566.37	12:04
151C	08/21/2018	5.02	573.18	568.16	12:10
158D	08/21/2018	37.88	598.20	560.32	13:44
159A	08/21/2018	19.71	596.16	576.45	14:29
159B	08/21/2018	25.60	596.37	570.77	14:30
159C	08/21/2018	28.66	597.36	568.70	14:30
159D	08/21/2018	42.96	597.67	554.71	14:30
160B	08/21/2018	13.46	582.75	569.29	13:39
160C	08/21/2018	19.95	582.72	562.77	13:39
161B	08/21/2018	11.63	582.84	571.21	13:33
161C	08/21/2018	21.39	582.64	561.25	13:35

APPENDIX A
GROUNDWATER ELEVATION DATA - 3Q18
Chemours Necco Park

Location ID	Date Measurement	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measured
162C	08/21/2018	17.00	581.00	564.00	13:21
163A	08/21/2018	5.84	578.14	572.30	12:21
163B	08/21/2018	5.82	577.94	572.12	12:20
163D	08/21/2018	20.99	578.82	557.83	12:22
163E	08/21/2018	22.16	579.06	556.90	12:24
163F	08/21/2018	24.28	578.76	554.48	12:26
164D	08/21/2018	20.30	577.42	557.12	12:34
164E	08/21/2018	22.81	577.32	554.51	12:32
164F	08/21/2018	22.79	577.27	554.48	12:30
165D	08/21/2018	14.86	577.52	562.66	14:02
165E	08/21/2018	23.20	577.56	554.36	14:02
165F	08/21/2018	23.72	577.72	554.00	14:03
167B	08/21/2018	11.34	580.93	569.59	13:12
168A	08/21/2018	8.25	578.72	570.47	13:17
168B	08/21/2018	11.49	578.90	567.41	13:19
168C	08/21/2018	15.04	579.21	564.17	13:21
169B	08/21/2018	11.42	580.43	569.01	13:27
170B	08/21/2018	11.09	579.10	568.01	13:38
171B	08/21/2018	10.33	579.54	569.21	13:38
172B	08/21/2018	8.12	576.95	568.83	12:58
173A	08/21/2018	10.42	580.71	570.29	12:34
174A	08/21/2018	7.19	577.62	570.43	12:10
175A	08/21/2018	14.44	586.81	572.37	12:50
176A	08/21/2018	9.61	580.03	570.42	12:38
178A	08/21/2018	9.75	579.92	570.17	12:29
179A	08/21/2018	8.86	579.01	570.15	12:19
184A	08/21/2018	9.75	579.88	570.13	12:49
185A	08/21/2018	10.45	580.84	570.39	12:59
186A	08/21/2018	11.18	579.76	568.58	13:05
187A	08/21/2018	10.74	579.94	569.20	13:07
188A	08/21/2018	13.95	580.91	566.96	13:59
189A	08/21/2018	11.97	579.82	567.85	13:22
190A	08/21/2018	11.74	580.58	568.84	13:14
191AR	08/21/2018	10.67	580.62	569.95	13:38
192A	08/21/2018	13.42	584.08	570.66	13:42
193A	08/21/2018	12.18	584.13	571.95	13:52
194A	08/21/2018	13.56	584.35	570.79	13:51
201B	08/21/2018	10.94	579.25	568.31	12:21
202D	08/21/2018	32.50	592.73	560.23	14:41
202E	08/21/2018	37.80	592.73	554.93	14:42
202F	08/21/2018	37.30	592.73	555.43	14:43
203D	08/21/2018	33.10	593.85	560.75	14:33

APPENDIX A
GROUNDWATER ELEVATION DATA - 3Q18
Chemours Necco Park

Location ID	Date Measurement	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measured
203E	08/21/2018	33.50	593.85	560.35	14:34
203F	08/21/2018	33.20	593.85	560.65	14:35
204C	08/21/2018	20.01	581.77	561.76	13:54
BZTW-1	08/21/2018	9.24	579.67	570.43	12:57
BZTW-2	08/21/2018	9.18	579.38	570.20	12:32
BZTW-4	08/21/2018	5.92	578.18	572.26	12:13
D-10	08/21/2018	15.57	580.02	564.45	12:44
D-11	08/21/2018	7.69	578.07	570.38	14:48
D-13	08/21/2018	7.68	579.07	571.39	12:13
D-14	08/21/2018	14.75	579.01	564.26	12:14
D-23	08/21/2018	12.68	580.61	567.93	13:26
D-9	08/21/2018	8.86	580.15	571.29	12:46
PZ-205B	08/21/2018	9.36	579.38	570.02	12:27
PZ-A	08/21/2018	9.72	579.06	569.34	12:23
PZ-B	08/21/2018	10.51	579.47	568.96	12:22
RDB-3	08/21/2018	6.29	579.31	573.02	14:51
RDB-5	08/21/2018	6.38	578.57	572.19	12:12
RW-11	08/21/2018	17.56	578.78	561.22	12:18
RW-4	08/21/2018	23.70	581.52	557.82	13:49
RW-5	08/21/2018	14.95	578.88	563.93	14:01
RW-8	08/21/2018	32.85	585.52	552.67	12:44
RW-9	08/21/2018	22.14	575.13	552.99	14:03
TRW-6	08/21/2018	10.19	580.21	570.02	12:35
TRW-7	08/21/2018	8.19	577.89	569.70	12:09

APPENDIX B

CHEMOOURS NECCO PARK
GWTF PROCESS SAMPLING RESULTS
THIRD QUARTER 2018

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

Method	CAS #	Parameter Name	Location Date Units	BC-INFLUENT 8/22/2018 FS	DEF-INFLUENT 8/22/2018 FS	COMB-EFFLUENT 8/22/2018 FS
		Field Parameters				
		COLOR	NONE	Black tint	Clear	Clear
		ODOR	NONE	Yes	Yes	Yes
		OXIDATION REDUCTION POTENTIAL	MV	-123	-206	-178
		PH	STD UNITS	5.85	6.89	6.89
		SPECIFIC CONDUCTANCE	UMHOS/CM	5260	3557	3656
		TEMPERATURE	DEGREES C	19.2	16	16.8
		TURBIDITY QUANTITATIVE	NTU	29.5	0.7	1.7
		Volatile Organics				
8260C	79-34-5	1,1,2,2-Tetrachloroethane	UG/L	4300	1200	1200
8260C	79-00-5	1,1,2-Trichloroethane	UG/L	2500	2000	790
8260C	75-35-4	1,1-Dichloroethene	UG/L	320	310	74
8260C	107-06-2	1,2-Dichloroethane	UG/L	470	150 J	98
8260C	56-23-5	Carbon Tetrachloride	UG/L	6300	880	890
8260C	67-66-3	Chloroform	UG/L	15000	2300	2700
8260C	156-59-2	cis-1,2 Dichloroethene	UG/L	7000	9300	2200
8260C	75-09-2	Methylene Chloride	UG/L	2600	4000	950
8260C	127-18-4	Tetrachloroethene	UG/L	8900	760	1400
8260C	156-60-5	trans-1,2-Dichloroethene	UG/L	320	680	120
8260C	79-01-6	Trichloroethene	UG/L	12000	3900	2300
8260C	75-01-4	Vinyl Chloride	UG/L	2200	2200	500
		Total VOCs	UG/L	61910	27680	13222

< Not detected at stated reporting limit

J Estimated concentration