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May 30, 2019

Ms. Young Chang
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 Young Chang:

NECCO PARK FIRST QUARTER 2019 DATA PACKAGE

Enclosed is the *First Quarter 2019 (1Q19) 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 1Q19 monitoring summary for dense non-aqueous phase liquid (DNAPL).

Pumping system uptime for 1Q19 was 85.7 percent. The total volume of groundwater treated during 1Q19 was 3,136,446 gallons. Monthly DNAPL locations were monitored on January 29, February 27, and March 28. No recoverable DNAPL was observed during the January and February monitoring. In March, 0.2 feet of DNAPL was observed in RW-4 and 3.0 feet was observed in RW-11. On April 8, 2019 well rehabilitation activities took place that removed the DNAPL from both RW-4 and RW-11. An estimated 12 gallons of DNAPL were removed from RW-11 and 0.8 gallons were removed from RW-4.

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. 1Q2019 Data Package

cc: Stanley Radon/NYSDEC
E. Felter/Parsons



**SOURCE AREA HYDRAULIC CONTROL SYSTEM
FIRST QUARTER 2019
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**

P.O. Box 788
Lewiston, NY 14092

Prepared By:

PARSONS

40 La Riviere Drive, Suite 350
Buffalo, New York 14202
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May 2019

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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 2019 (1Q19) 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 55th 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 1Q19:

	HCS Uptime (%)	Groundwater Treated (gallons)	DNAPL Removed (gallons)
January	70.0%	864,445	0
February	90.1%	1,130,535	0
March	97.1%	1,141,466	12.8
1Q19 Total	85.7%	3,136,446	12.8

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. Downtime (for HCS or individual recovery wells, scheduled or unscheduled) is discussed below when the downtime is 48 consecutive hours or greater.

There was no unscheduled or scheduled downtime during the quarter for the entire HCS. Additionally, there was no scheduled downtime during the quarter for any individual recovery wells. There were two wells down in January. RW-5 was down 392 hours between January 6 and 23, and RW-11 was down for 374 hours between January 6 and 22. Both wells were down due to the failure of each wells variable frequency drive (VFD). New VFD models

were purchased, installed, and programmed. A common spare VFD has also been prepared to respond to any future unanticipated outage.

Monthly DNAPL locations were monitored on January 29, February 27, and March 28. No recoverable DNAPL was observed during the January and February monitoring. In March, 0.2 feet of DNAPL was observed in RW-4 and 3.0 feet was observed in RW-11. On April 8, 2019 well rehabilitation activities took place that removed the DNAPL from both RW-4 and RW-11. An estimated 12 gallons of DNAPL were removed from RW-11 and 0.8 gallons were removed from RW-4.

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 1Q19 in accordance with the SAMP and the approved reduction to VOCs only (USEPA, January 2012). Samples were collected by Parsons on March 20, 2019 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 1Q19 sewer discharge samples were collected on February 6, 2019 (following NFWB quarterly calendar). There were no permit limit exceedances in 1Q19. The results indicate that the GWTF continued operating within normal parameters during 1Q19.

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 1Q19
Chemours Necco Park

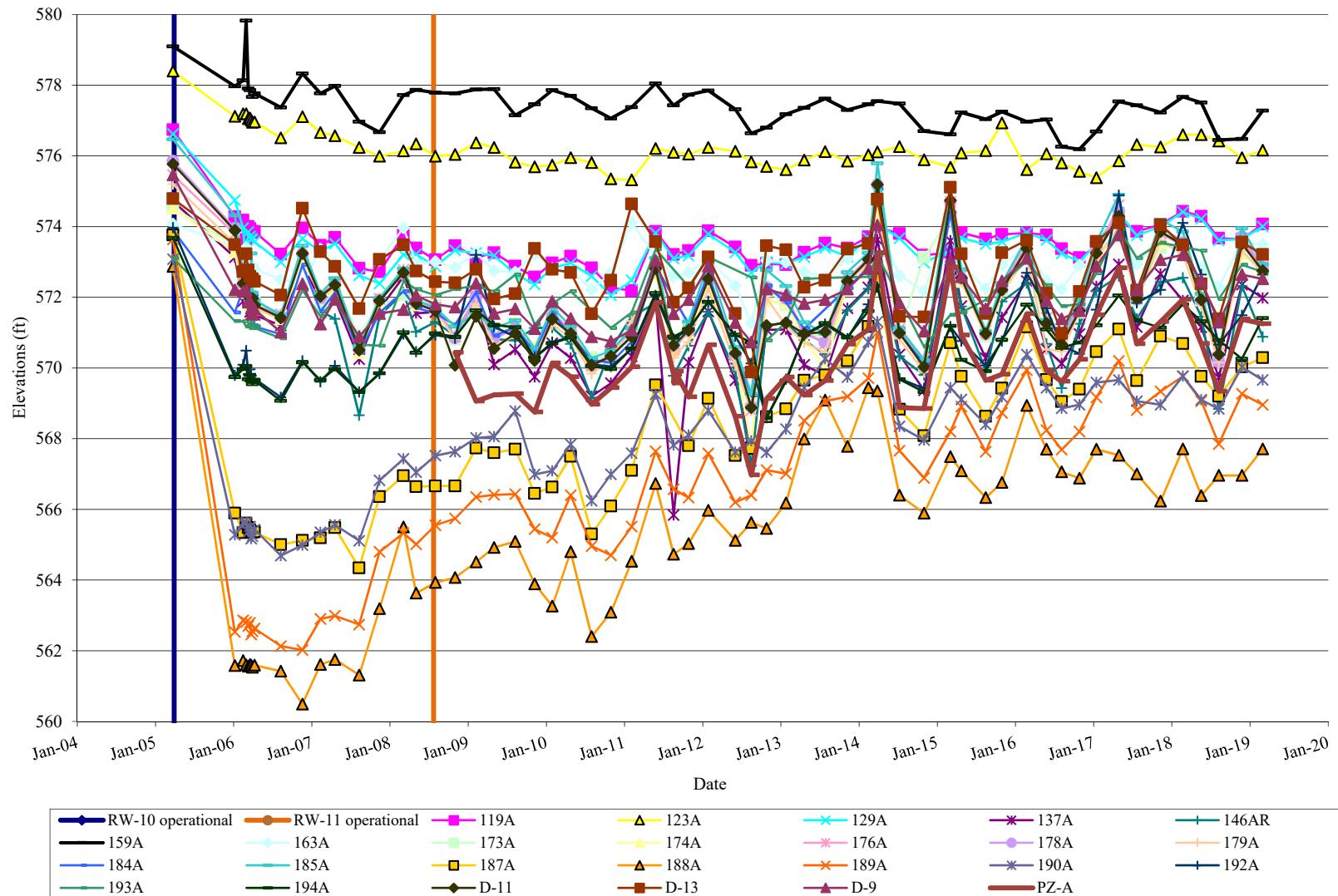
	Well ID	Date(s)	Length of Shutdown (hours)	Reason for Shutdown	Remarks
January	RW-5	January 6 through January 23	392 hrs	Failure of Variable Frequency Drive (VFD)	
	RW-11	January 6 through January 22	374 hrs	Failure of Variable Frequency Drive (VFD)	
February				No wells were down for greater than 48 hours in February 2019.	
March				No wells were down for greater than 48 hours in March 2019.	

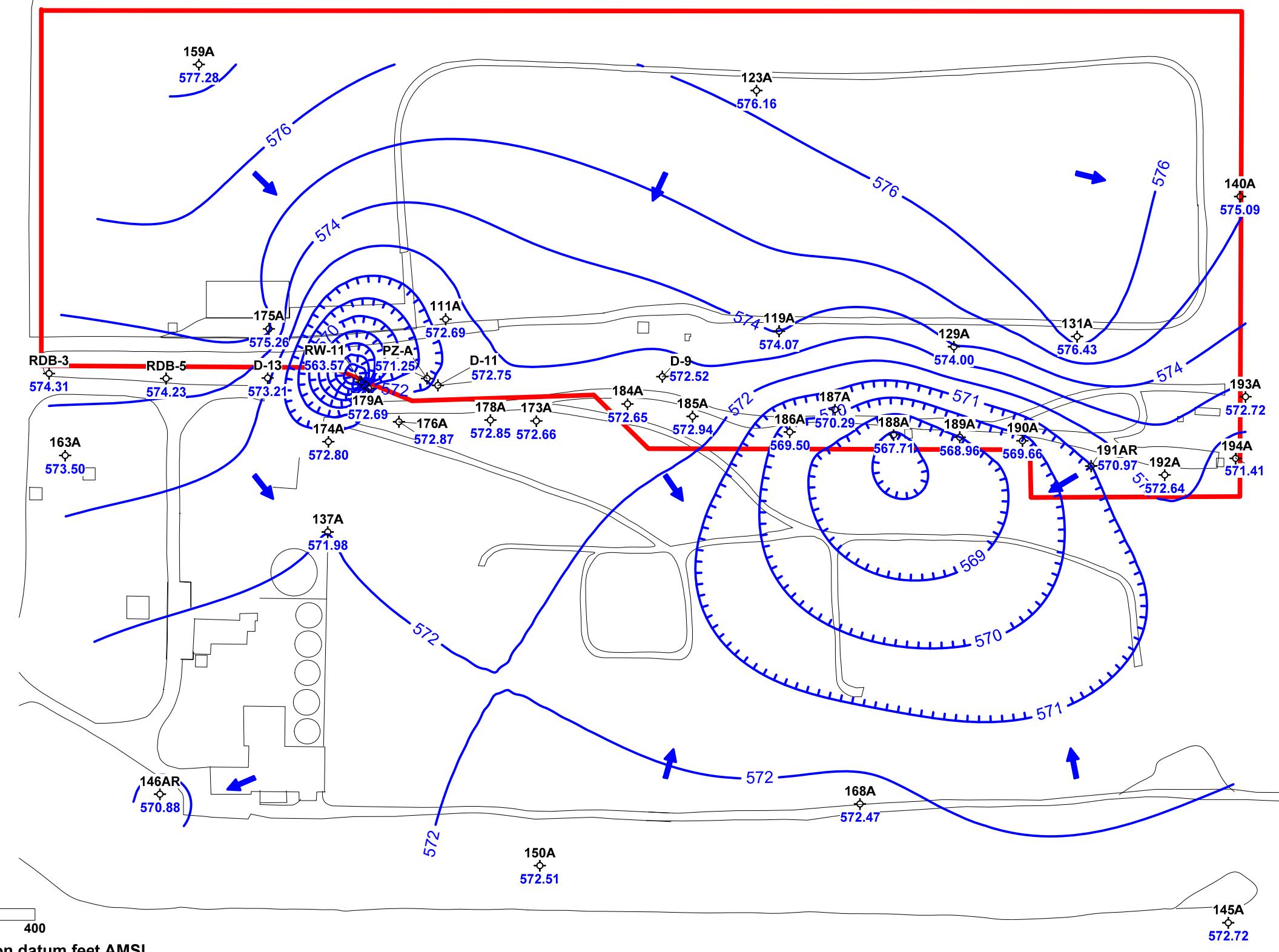
Table 2
Historical HCS Operational Summary - 1Q19
Chemours Necco Park

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
4Q18	92.7	92.7	3,259,882	0
1Q19	85.7	85.7	3,136,446	12.8
TOTALS	---	---	189,759,637	1,414
AVERAGE	86.8	93.6	---	---

FIGURES

Figure 1
Select A-Zone Monitoring Wells
Groundwater Elevations 2005 Through 1st Quarter 2019
Chemours Necco Park





PARSONS
40 La Riviere Dr, Suite 350
Buffalo, NY 14202
(716) 541-0730

Created by: RBP	Date: 03-27-19
Checked by: JWS	Date: 04-01-19
Project Manager: EAF	Date: 04-01-19
Job number: 451478.02024	

LEGEND

- 3B Well ID
- ♦ Monitoring Well
- ◆ Pumping Well
- Potentiometric Contour
- Structure
- Road

Figure 2
Potentiometric Surface Map
Chemours Necco Park: A-Zone
March 14, 2019



159A/B
-0.30

111A/B
-0.13

119A/B
-0.07

129A/B
-0.21

163A/B
-0.02

137A/B
-0.15

168A/B
-0.75

150A/B
-0.16

145A/B
-0.18

Scale: Feet



Negative value indicates downward gradient

Elevation datum feet AMSL

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Checked by: JWS	Date: 04-01-19
Project Manager: EAF	Date: 04-01-19
Job number: 451478.02024	

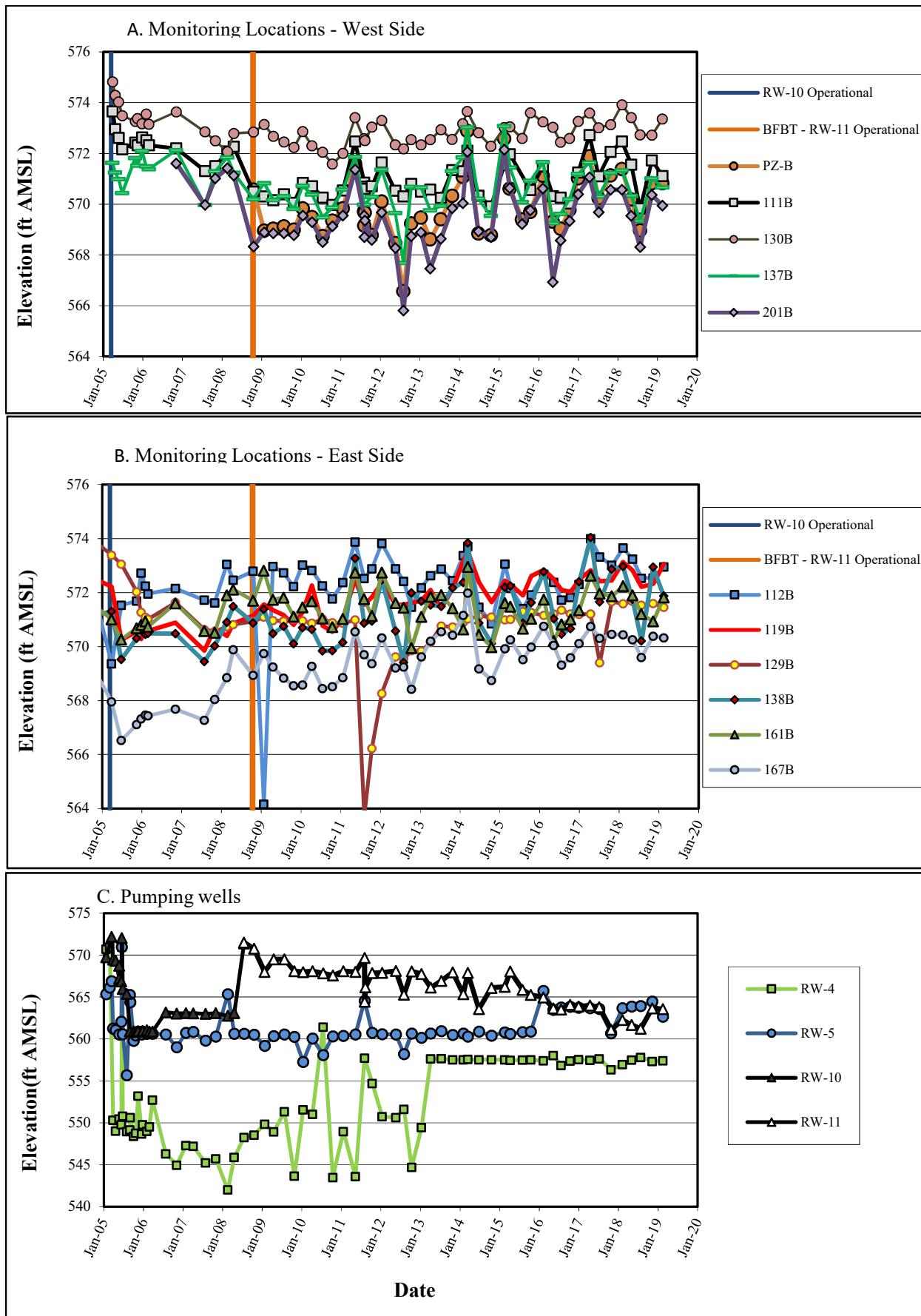
150A/B Well ID
◇ Monitoring Well
◆ Pumping Well

LEGEND
Structure
Road

-0.16 Vertical Hydraulic Gradient

Figure 3
Vertical Gradient: A-Zone to B-Zone
Chemours Necco Park
March 14, 2019

Figure 4
Select B-Zone Monitoring Wells
Groundwater Elevations 2005 through 1st Quarter 2019
Chemours Necco Park



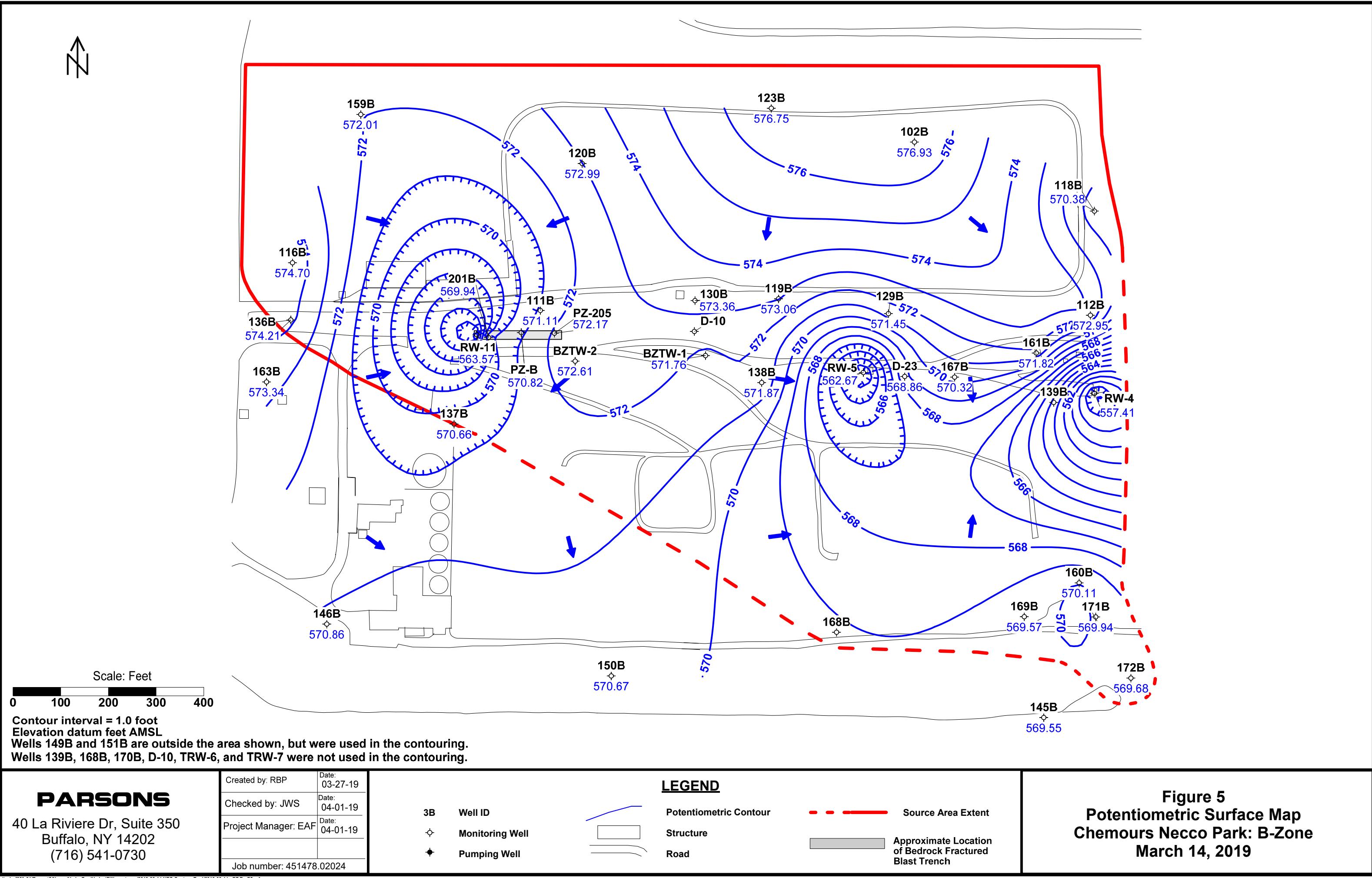
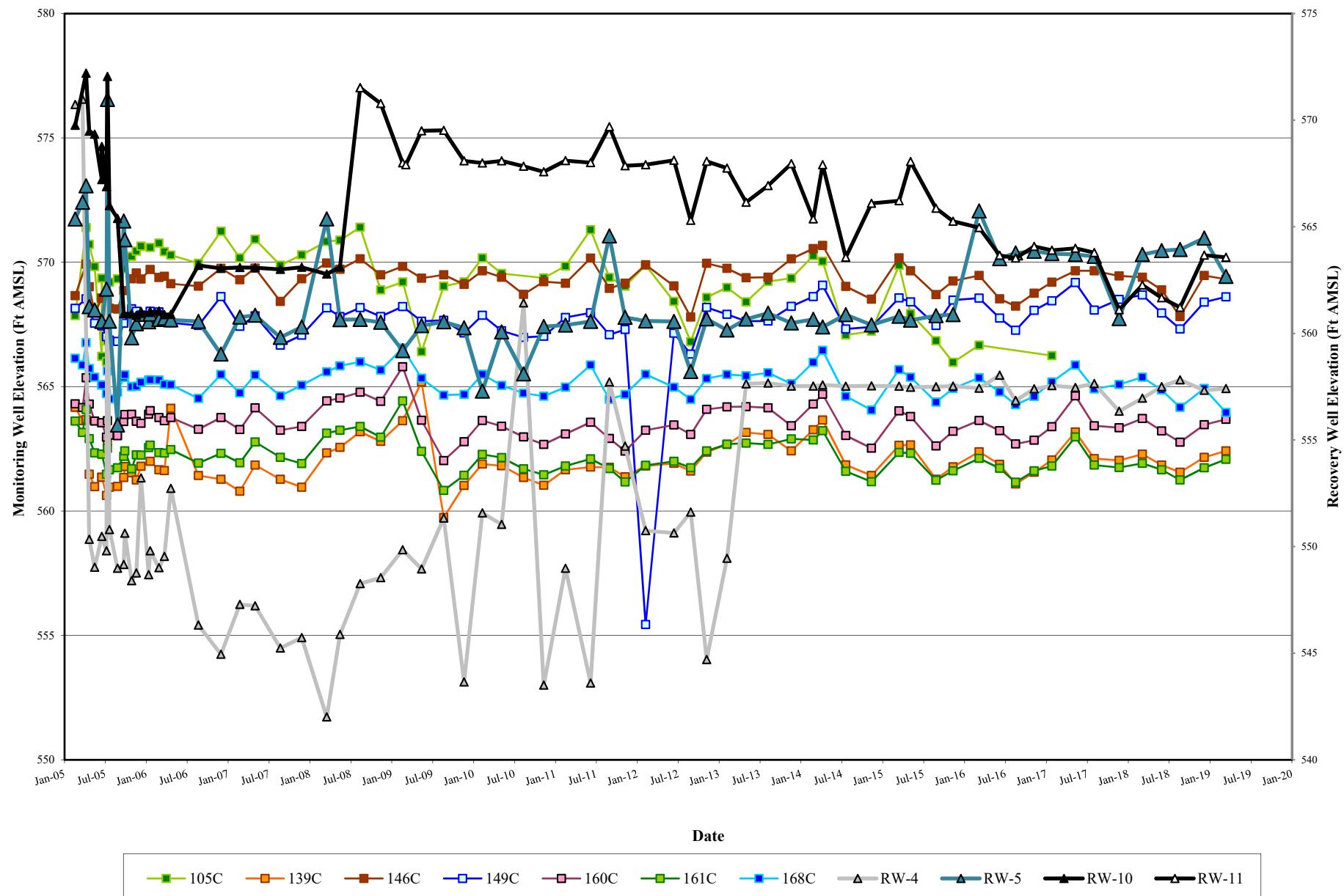


Figure 6
Select C-Zone Monitoring Wells
Groundwater Elevations 2005 Through 1st Quarter 2019
Chemours Necco Park



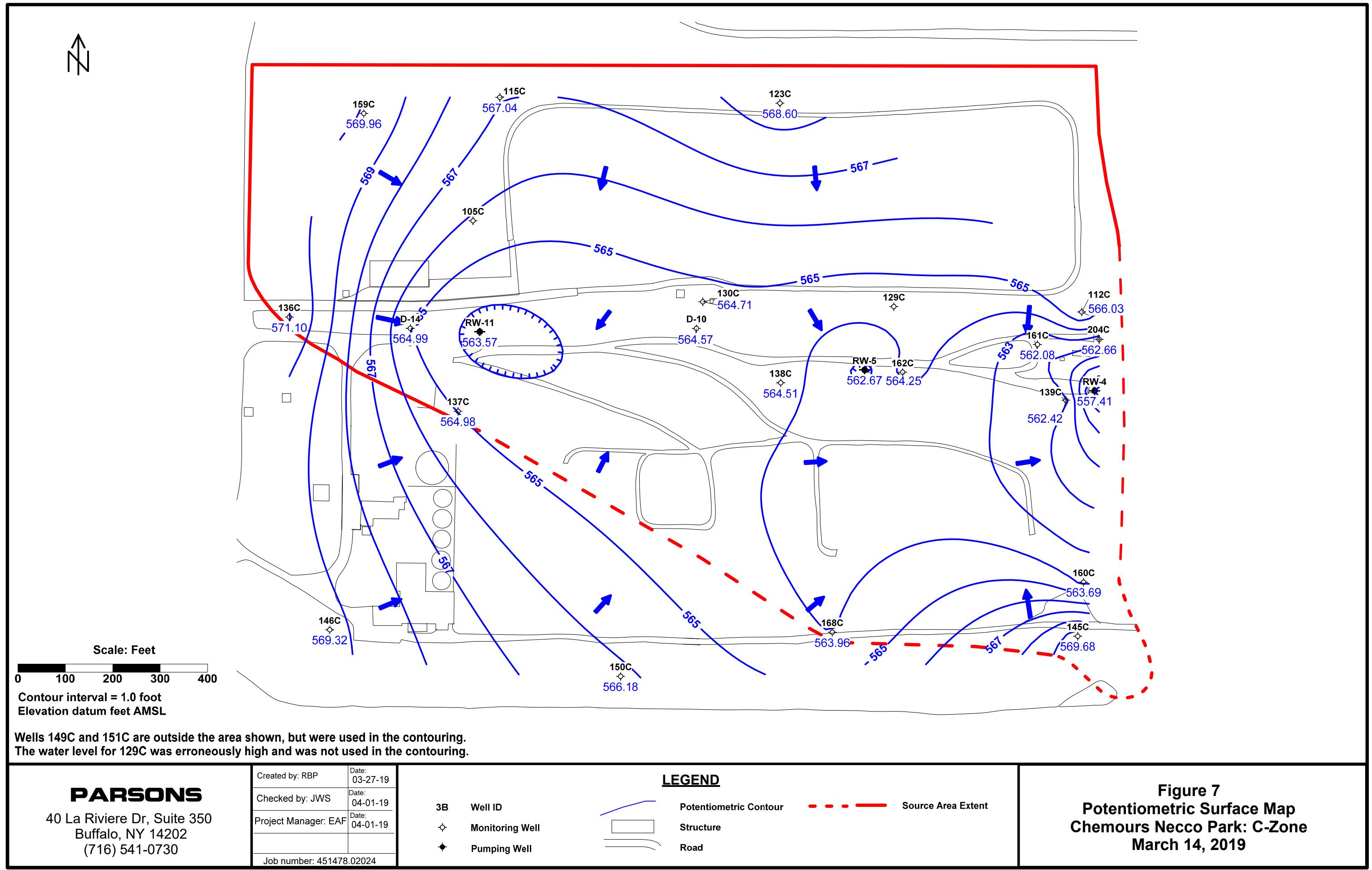
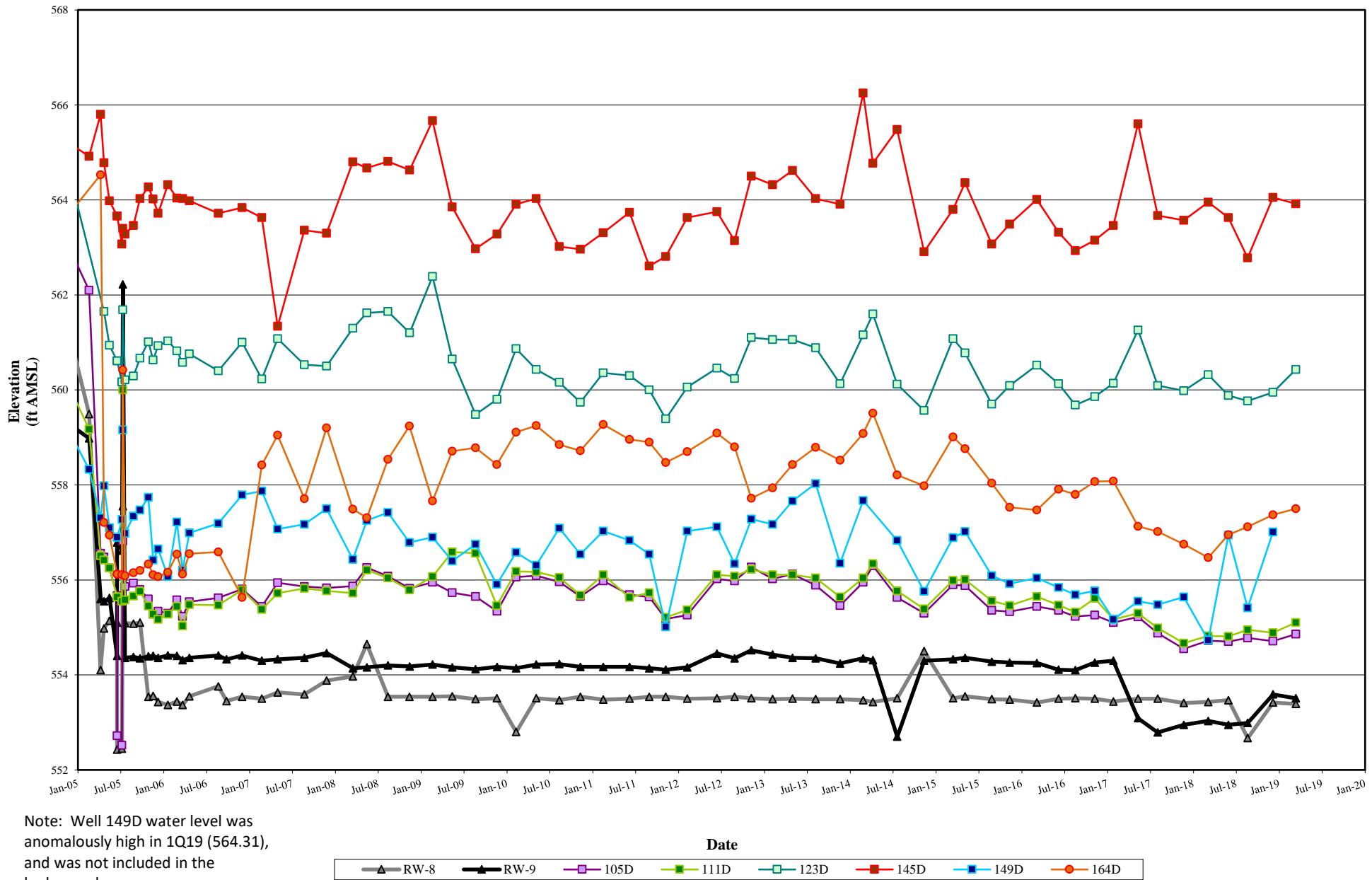
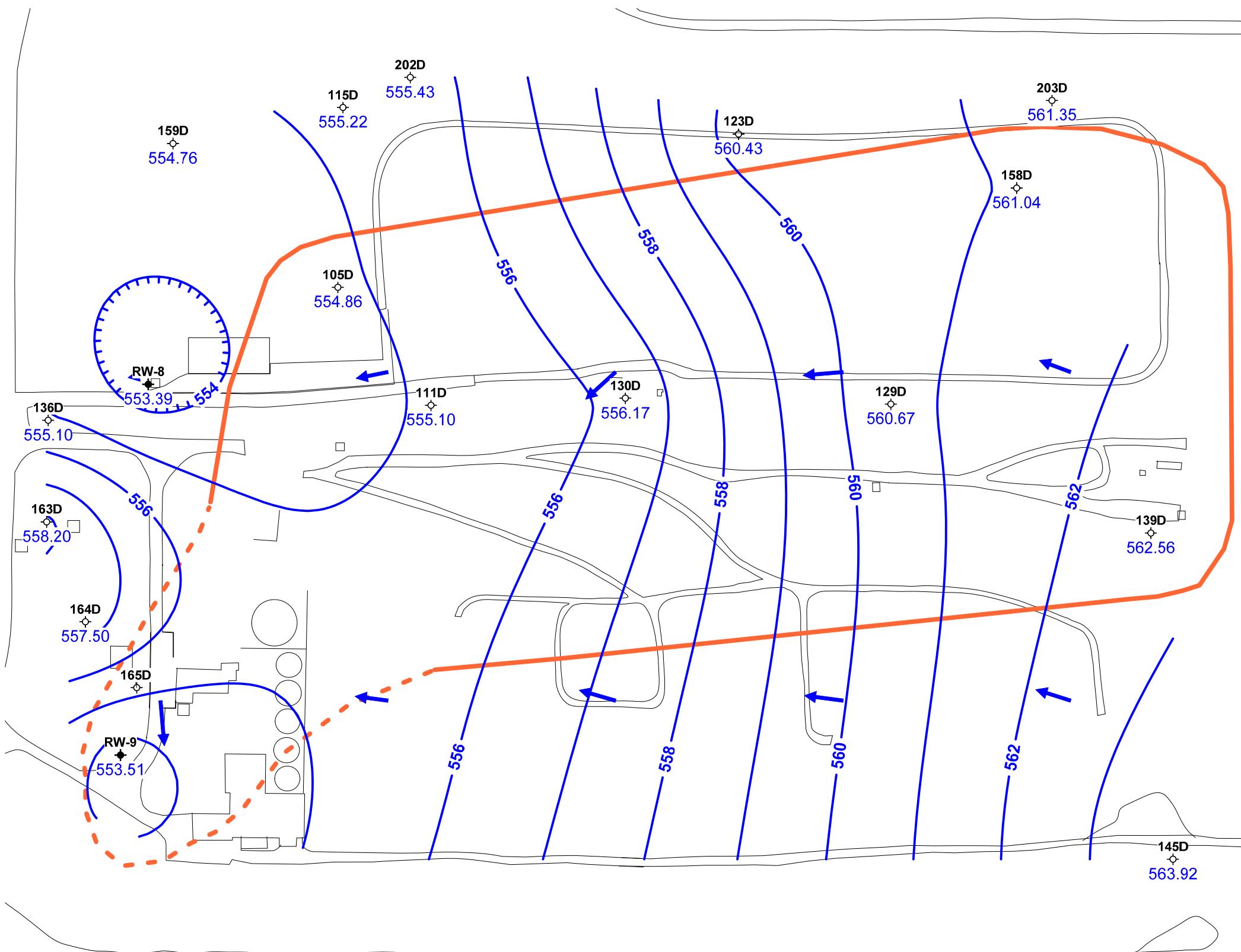


Figure 8
Select D-Zone Monitoring Wells
Groundwater Elevations 2005 through 1st Quarter 2019
Chemours Necco Park





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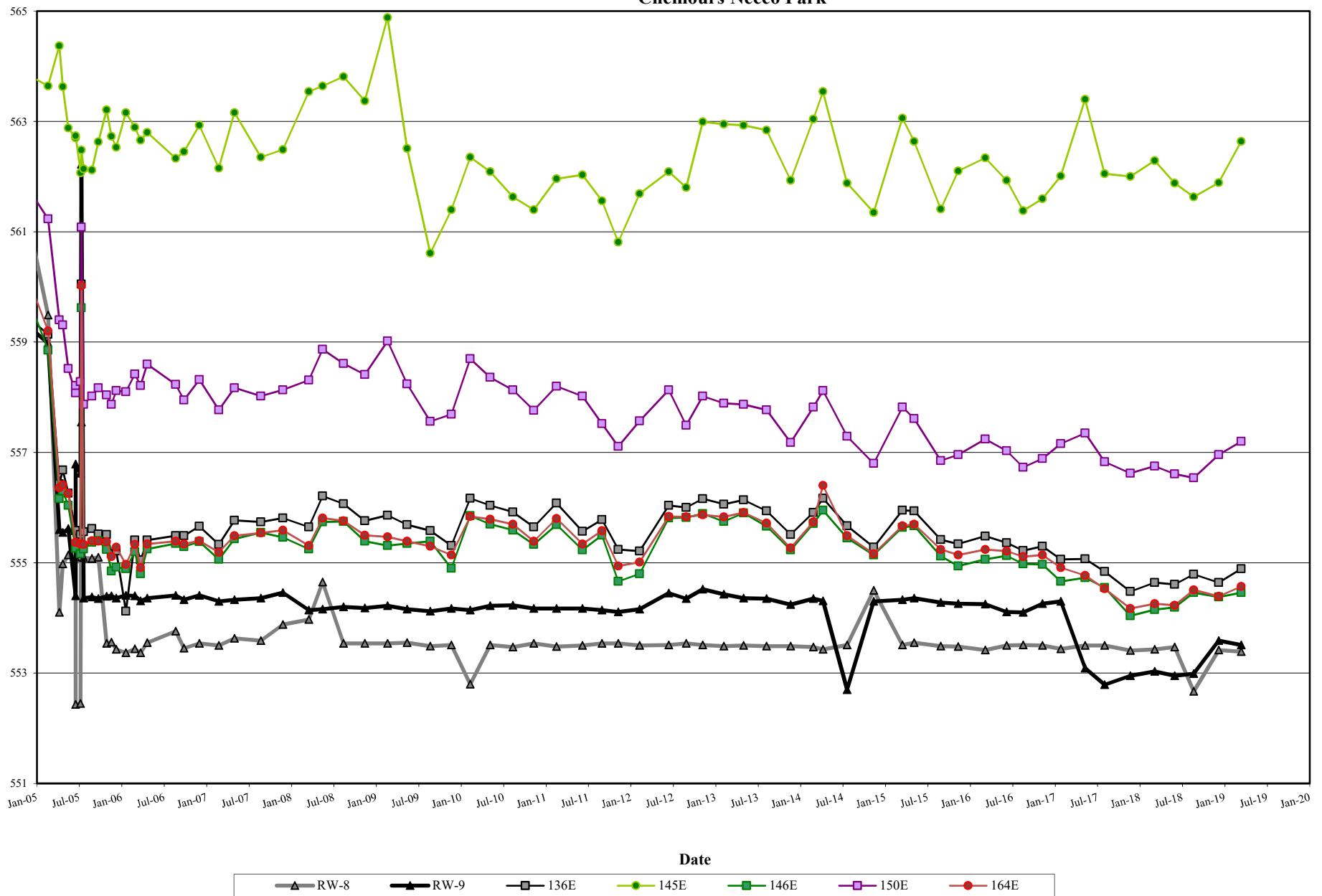
Created by: RBP	Date: 03-27-19
Checked by: JWS	Date: 04-01-19
Project Manager: EAF	Date: 04-01-19
Job number: 451478.02024	

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
March 14, 2019

Figure 10
Select E-Zone Monitoring Wells
Groundwater Elevations 2005 Through 1st Quarter 2019
Chemours Necco Park



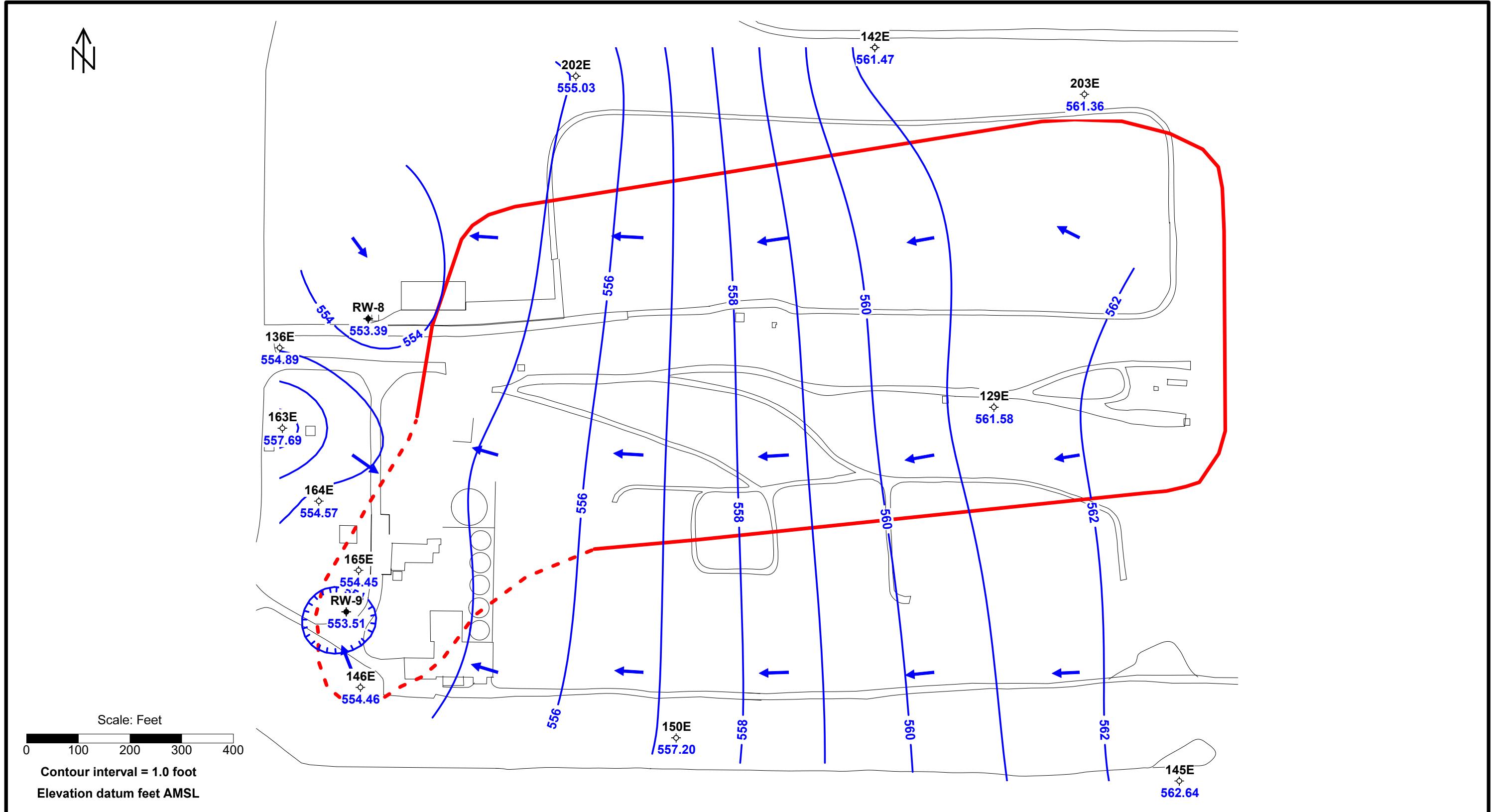
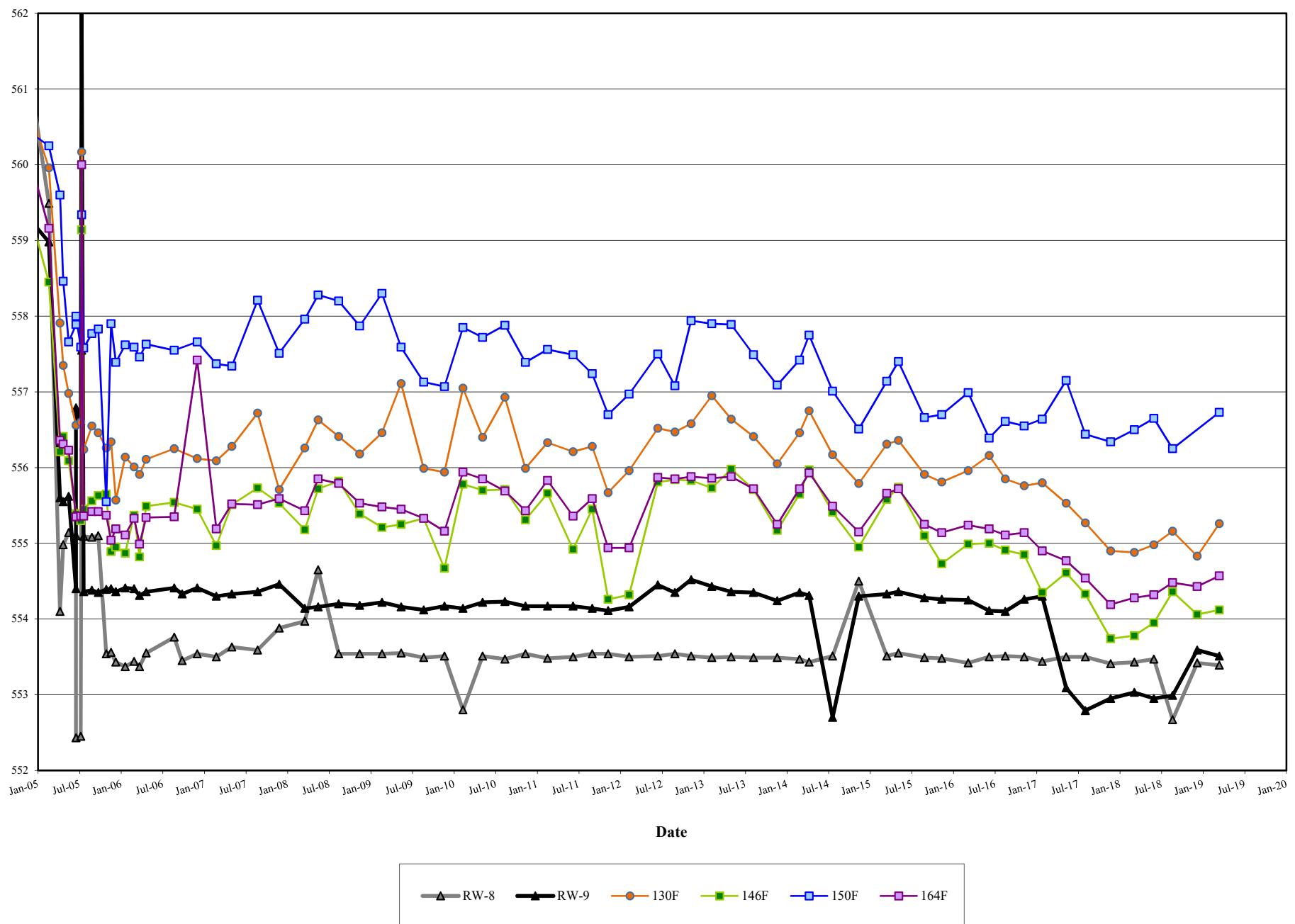
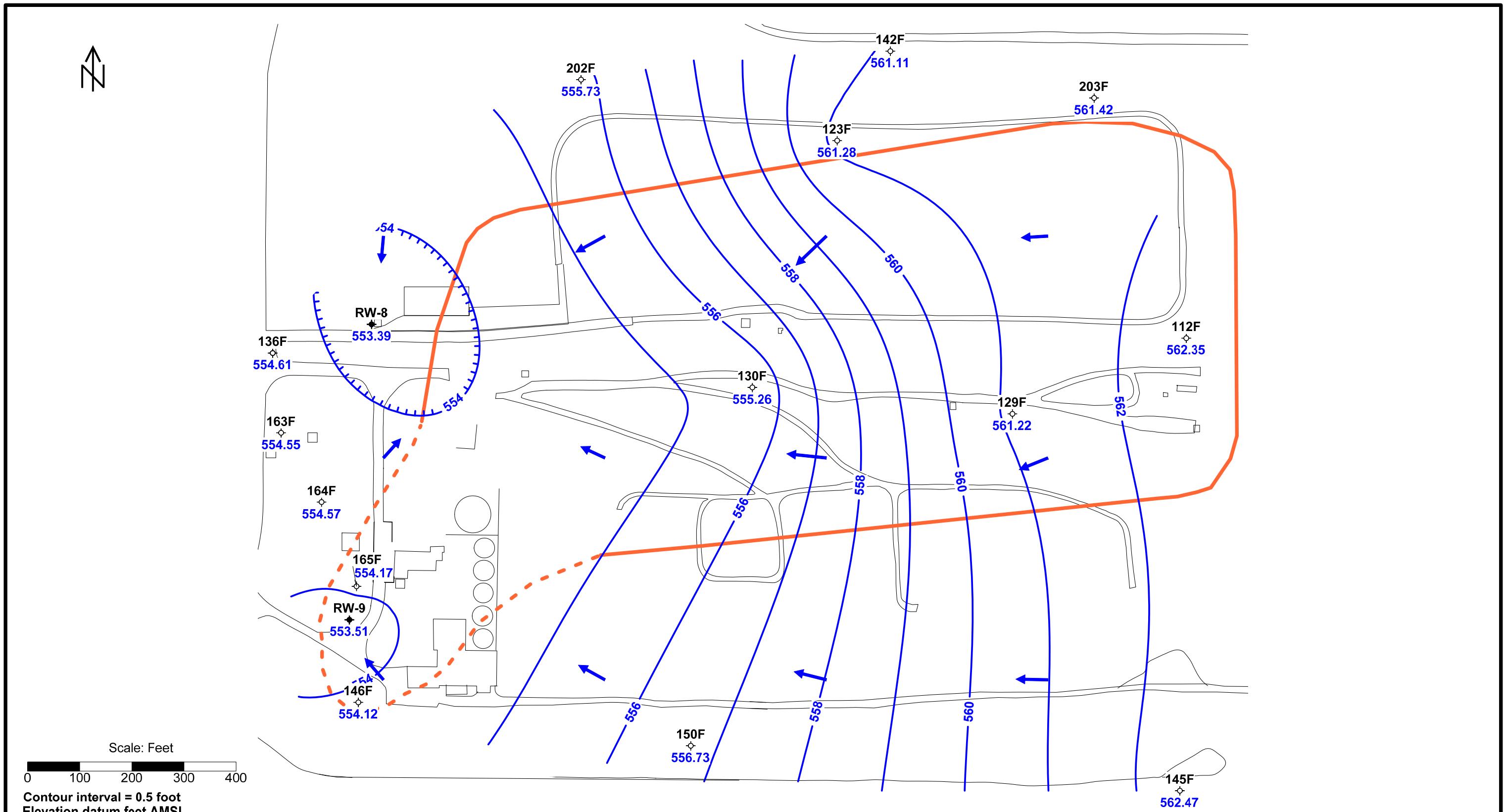


Figure 12
Select F-Zone Monitoring Wells
Groundwater Elevations 2005 Through 1st Quarter 2019
Chemours Necco Park





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Checked by: JWS	Date: 04-01-19
Project Manager: EAF	Date: 04-01-19
Job number: 451478.02024	

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

Figure 13
Potentiometric Surface Map
Chemours Necco Park: F-Zone
March 14, 2019

APPENDIX A

CHEMOOURS NECCO PARK
GROUNDWATER ELEVATION DATA
FIRST QUARTER 2019

APPENDIX A
GROUNDWATER ELEVATION DATA - 1Q19
Chemours Necco Park

Location ID	Date Measured	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measured
102B	03/14/2019	22.08	599.01	576.93	12:46
105C	03/14/2019	well dry	595.28	well dry	13:18
105D	03/14/2019	39.91	594.77	554.86	13:16
111A	03/14/2019	14.20	586.89	572.69	11:52
111B	03/14/2019	13.83	584.94	571.11	11:58
111D	03/14/2019	29.20	584.30	555.10	11:58
112B	03/14/2019	8.95	581.90	572.95	12:27
112C	03/14/2019	16.90	582.93	566.03	12:25
112F	03/14/2019	20.94	583.29	562.35	12:28
115C	03/14/2019	28.89	595.93	567.04	13:03
115D	03/14/2019	41.40	596.62	555.22	13:05
116B	03/14/2019	15.35	590.05	574.70	11:41
118B	03/14/2019	13.52	583.90	570.38	12:30
119A	03/14/2019	12.27	586.34	574.07	12:11
119B	03/14/2019	13.71	586.77	573.06	12:10
120B	03/14/2019	26.19	599.18	572.99	12:57
123A	03/14/2019	21.77	597.93	576.16	12:54
123B	03/14/2019	19.23	595.98	576.75	12:52
123C	03/14/2019	26.82	595.42	568.60	12:50
123D	03/14/2019	36.08	596.51	560.43	12:49
123F	03/14/2019	37.29	598.57	561.28	12:53
129A	03/14/2019	10.80	584.80	574.00	12:15
129B	03/14/2019	13.79	585.24	571.45	12:19
129C	03/14/2019	11.85	585.68	573.83	12:16
129D	03/14/2019	25.36	586.03	560.67	12:17
129E	03/14/2019	19.30	580.88	561.58	12:31
129F	03/14/2019	20.14	581.36	561.22	12:32
130B	03/14/2019	12.27	585.63	573.36	12:03
130C	03/14/2019	20.80	585.51	564.71	12:06
130D	03/14/2019	28.79	584.96	556.17	12:04
130F	03/14/2019	26.23	581.49	555.26	12:01
131A	03/14/2019	9.00	585.43	576.43	12:22
136B	03/14/2019	7.48	581.69	574.21	11:18
136C	03/14/2019	10.52	581.62	571.10	11:17
136D	03/14/2019	24.58	579.68	555.10	11:16
136E	03/14/2019	24.70	579.59	554.89	11:14
136F	03/14/2019	25.72	580.33	554.61	11:09
136F	03/14/2019	25.84	580.33	554.49	13:35
136G	03/14/2019	22.16	579.76	557.60	11:07
137A	03/14/2019	6.49	578.47	571.98	11:26
137B	03/14/2019	7.65	578.31	570.66	11:23
137C	03/14/2019	13.41	578.39	564.98	11:20
137D	03/14/2019	15.23	579.09	563.86	11:24

APPENDIX A
GROUNDWATER ELEVATION DATA - 1Q19
Chemours Necco Park

Location ID	Date Measured	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measured
138B	03/14/2019	12.11	583.98	571.87	12:10
138C	03/14/2019	22.55	587.06	564.51	12:12
139A	03/14/2019	13.79	585.14	571.35	12:40
139B	03/14/2019	5.20	585.39	580.19	12:43
139C	03/14/2019	22.85	585.27	562.42	12:46
139D	03/14/2019	22.93	585.49	562.56	12:46
140A	03/14/2019	6.46	581.55	575.09	12:32
142E	03/14/2019	24.53	586.00	561.47	13:36
142F	03/14/2019	24.58	585.69	561.11	13:36
145A	03/14/2019	3.12	575.84	572.72	12:35
145B	03/14/2019	5.93	575.48	569.55	13:13
145C	03/14/2019	6.22	575.90	569.68	12:09
145D	03/14/2019	12.13	576.05	563.92	12:11
145E	03/14/2019	13.34	575.98	562.64	12:37
145F	03/14/2019	13.58	576.05	562.47	12:38
146AR	03/14/2019	6.04	576.92	570.88	11:28
146B	03/14/2019	6.04	576.90	570.86	11:31
146C	03/14/2019	7.03	576.35	569.32	11:29
146E	03/14/2019	21.62	576.08	554.46	11:29
146F	03/14/2019	21.92	576.04	554.12	11:34
148D	03/14/2019	8.17	579.38	571.21	13:09
148F	03/14/2019	23.71	576.21	552.50	13:12
149B	03/14/2019	3.75	572.87	569.12	12:56
149C	03/14/2019	4.65	573.26	568.61	12:59
149D	03/14/2019	8.55	572.86	564.31	13:00
150A	03/14/2019	3.35	575.86	572.51	12:21
150B	03/14/2019	5.32	575.99	570.67	12:22
150C	03/14/2019	9.95	576.13	566.18	12:24
150E	03/14/2019	18.95	576.15	557.20	12:26
150F	03/14/2019	19.25	575.98	556.73	12:28
151B	03/14/2019	5.93	573.36	567.43	13:25
151C	03/14/2019	4.63	573.18	568.55	13:22
158D	03/14/2019	37.16	598.20	561.04	12:36
159A	03/14/2019	18.88	596.16	577.28	13:13
159B	03/14/2019	24.36	596.37	572.01	13:12
159C	03/14/2019	27.40	597.36	569.96	13:12
159D	03/14/2019	42.91	597.67	554.76	13:11
160B	03/14/2019	12.64	582.75	570.11	11:59
160C	03/14/2019	19.03	582.72	563.69	11:57
161B	03/14/2019	11.02	582.84	571.82	12:59
161C	03/14/2019	20.56	582.64	562.08	13:00
162C	03/14/2019	16.75	581.00	564.25	12:23
163A	03/14/2019	4.64	578.14	573.50	11:22

APPENDIX A
GROUNDWATER ELEVATION DATA - 1Q19
Chemours Necco Park

Location ID	Date Measured	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measured
163B	03/14/2019	4.60	577.94	573.34	11:21
163D	03/14/2019	20.62	578.82	558.20	11:24
163E	03/14/2019	21.37	579.06	557.69	11:28
163F	03/14/2019	24.21	578.76	554.55	11:25
164D	03/14/2019	19.92	577.42	557.50	11:33
164E	03/14/2019	22.75	577.32	554.57	11:32
164F	03/14/2019	22.70	577.27	554.57	11:31
165D	03/14/2019	13.74	577.52	563.78	11:09
165E	03/14/2019	23.11	577.56	554.45	11:15
165F	03/14/2019	23.55	577.72	554.17	11:17
167B	03/14/2019	10.61	580.93	570.32	12:36
168A	03/14/2019	6.25	578.72	572.47	11:51
168B	03/14/2019	14.2	578.90	564.7	11:52
168C	03/14/2019	15.25	579.21	563.96	11:46
169B	03/14/2019	10.86	580.43	569.57	12:14
170B	03/14/2019	10.95	579.10	568.15	12:07
171B	03/14/2019	9.60	579.54	569.94	12:03
172B	03/14/2019	7.27	576.95	569.68	12:41
173A	03/14/2019	8.05	580.71	572.66	11:51
174A	03/14/2019	4.82	577.62	572.80	11:15
175A	03/14/2019	11.55	586.81	575.26	11:49
176A	03/14/2019	7.16	580.03	572.87	11:37
178A	03/14/2019	7.07	579.92	572.85	11:47
179A	03/14/2019	6.32	579.01	572.69	11:29
184A	03/14/2019	7.23	579.88	572.65	11:55
185A	03/14/2019	7.90	580.84	572.94	12:08
186A	03/14/2019	10.26	579.76	569.50	12:14
187A	03/14/2019	9.65	579.94	570.29	12:15
188A	03/14/2019	13.20	580.91	567.71	12:18
189A	03/14/2019	10.86	579.82	568.96	12:26
190A	03/14/2019	10.92	580.58	569.66	12:34
191AR	03/14/2019	9.65	580.62	570.97	12:38
192A	03/14/2019	11.44	584.08	572.64	12:42
193A	03/14/2019	11.41	584.13	572.72	12:51
194A	03/14/2019	12.94	584.35	571.41	12:49
201B	03/14/2019	9.31	579.25	569.94	11:31
202D	03/14/2019	37.30	592.73	555.43	13:05
202E	03/14/2019	37.70	592.73	555.03	13:06
202F	03/14/2019	37.00	592.73	555.73	13:07
203D	03/14/2019	32.50	593.85	561.35	12:40
203E	03/14/2019	32.49	593.85	561.36	12:41
203F	03/14/2019	32.43	593.85	561.42	12:43
204C	03/14/2019	19.11	581.77	562.66	12:53

APPENDIX A
GROUNDWATER ELEVATION DATA - 1Q19
Chemours Necco Park

Location ID	Date Measured	Depth to Water	Reference Elevation	Groundwater Elevation	Time Measured
BZTW-1	03/14/2019	7.91	579.67	571.76	12:06
BZTW-2	03/14/2019	6.77	579.38	572.61	11:48
BZTW-4	03/14/2019	4.28	578.18	573.90	11:36
D-10	03/14/2019	15.45	580.02	564.57	12:04
D-11	03/14/2019	5.32	578.07	572.75	11:42
D-13	03/14/2019	5.86	579.07	573.21	11:11
D-14	03/14/2019	14.02	579.01	564.99	11:07
D-23	03/14/2019	11.75	580.61	568.86	12:28
D-9	03/14/2019	7.63	580.15	572.52	12:03
PZ-205B	03/14/2019	7.21	579.38	572.17	11:45
PZ-A	03/14/2019	7.81	579.06	571.25	11:39
PZ-B	03/14/2019	8.65	579.47	570.82	11:39
RDB-3	03/14/2019	5.00	579.31	574.31	11:10
RDB-5	03/14/2019	4.34	578.57	574.23	11:38
RW-11	03/14/2019	15.21	578.78	563.57	11:33
RW-4	03/14/2019	24.11	581.52	557.41	12:57
RW-5	03/14/2019	16.21	578.88	562.67	12:20
RW-8	03/14/2019	32.13	585.52	553.39	11:44
RW-9	03/14/2019	21.62	575.13	553.51	11:25
TRW-6	03/14/2019	7.99	580.21	572.22	11:52
TRW-7	03/14/2019	6.19	577.89	571.70	11:17

APPENDIX B

CHEMOOURS NECCO PARK
GWTF PROCESS SAMPLING RESULTS
FIRST QUARTER 2019

Appendix B
Summary of Analytical Results
Chemours Necco Park
First Quarter 2019

Method	CAS #	Parameter Name	Location Date Units	BC-INFLUENT 3/20/2019 FS	DEF-INFLUENT 3/20/2019 FS	COMB-EFFLUENT 3/20/2019 FS	TRIP BLANK 3/20/2019 TB
		Field Parameters					
		COLOR	NONE	Dark grey	Clear	Dark grey	
		ODOR	NONE	NA	NA	NA	
		OXIDATION REDUCTION POTENTIAL	MV	-125.5	-178.5	-93	
		PH	STD UNITS	6.58	7.17	8.09	
		SPECIFIC CONDUCTANCE	UMHOS/CM	3.371	4.413	3.898	
		TEMPERATURE	DEGREES C	10.26	11.66	10.11	
		TURBIDITY QUANTITATIVE	NTU	1000	68.1	1000	
		Volatile Organics					
8260C	79-34-5	1,1,2,2-Tetrachloroethane	UG/L	7000	1500	1800	<0.13
8260C	79-00-5	1,1,2-Trichloroethane	UG/L	3800	2200	700	<0.09
8260C	75-35-4	1,1-Dichloroethene	UG/L	200	230	0.41 J	<0.19
8260C	107-06-2	1,2-Dichloroethane	UG/L	430	160 J	41	<0.21
8260C	56-23-5	Carbon Tetrachloride	UG/L	7300	690	9.6	<0.26
8260C	67-66-3	Chloroform	UG/L	22000	2500	360	0.25 J
8260C	156-59-2	cis-1,2 Dichloroethene	UG/L	4300	9300	190	0.51 J
8260C	75-09-2	Methylene Chloride	UG/L	2300	4600	190 J	<2.6
8260C	127-18-4	Tetrachloroethene	UG/L	11000	710	43	0.43 J
8260C	156-60-5	trans-1,2-Dichloroethene	UG/L	270	560	2.2	<0.19
8260C	79-01-6	Trichloroethene	UG/L	16000	3400	130 B	0.65 J
8260C	75-01-4	Vinyl Chloride	UG/L	720	1400	1.5	<0.2
		Total VOCs	UG/L	75320	27250	3337.7	0

< Not detected at stated reporting limit

J Estimated concentration

B Found in blank at similar concentration