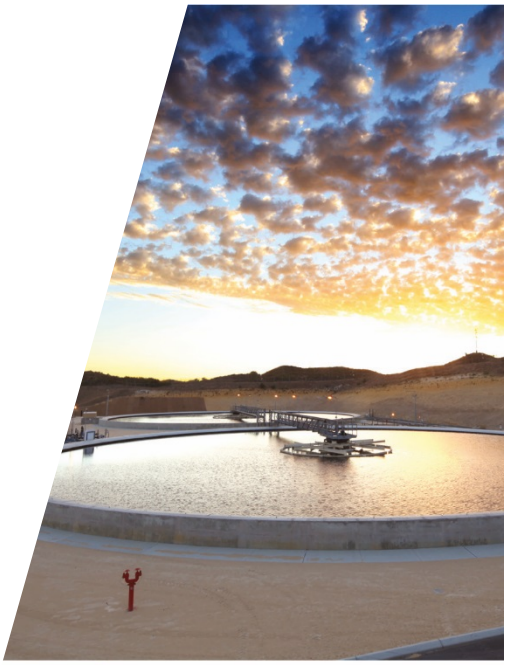
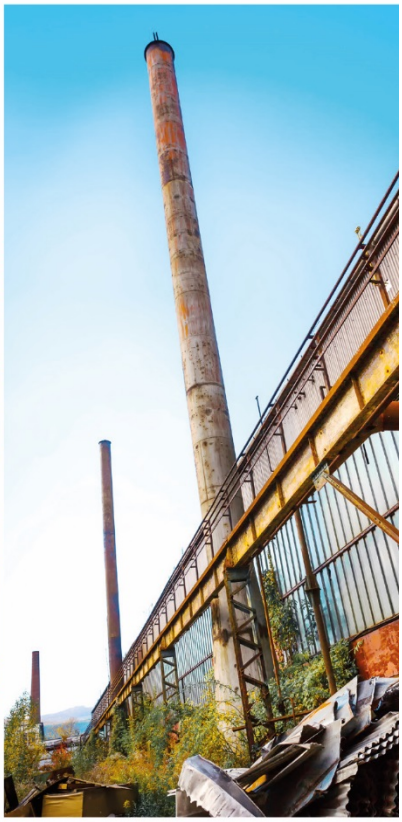


# Supplemental 2020 Pre-Remedial Groundwater Confirmation Sampling Work Plan

Ex-Eaton Site
34-40 Clinton Street
Batavia, New York
Site No. C819022

CNH Industrial Baumaschinen GmbH
Berlin, Germany



NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

**Division of Environmental Remediation, Region 8**
6274 East Avon-Lima Road, Avon, NY 14414-9516
P: (585) 226-5353 I F: (585) 226-8139
www.dec.ny.gov

October 22, 2020

Klauss Rekitt
c/o Ronald Hull, Esq.
Heisman Nunes & Hull, LLP
69 Cascade Drive, Suite 102
Rochester, New York 14614

**Re: Ex-Eaton Site (#C819022)**
**22-40 Clinton Street, Batavia, Genesee County**
**Supplemental 2020 Pre-Remedial**
**Groundwater Confirmation Sampling Work Plan**
**September 24, 2020**

Dear Mr. Rekitt;

The New York State Departments of Environmental Conservation (NYSDEC) and Health (collectively referred to as the Departments) have completed their review of the document entitled *"Supplemental 2020 Pre-Remedial Groundwater Confirmation Sampling Work Plan"* (the Work Plan) dated September 24, 2020 and prepared by GHD for the Ex-Eaton site. In accordance with 6 NYCRR Part 375-1.6, the Departments have determined that the Work Plan, substantially addresses the requirements of the Brownfield Cleanup Program. With the following modifications, the Work Plan is herby approved.

1. Section 2.2.1: Purging of the well will continue until the well is stabilized and will not stop at a maximum of 5 well volumes. The following statement in the second paragraph, first sentence, shall read: If stabilization has not occurred after removal of three well volumes, purging will continue until the well is stabilized, and then the well will be sampled.

2. Section 3: Analytical data results will be submitted to the Departments once they are received and will not wait until validation.

3. The approved Master Schedule dated October 1st, 2020 will be adhered to as part of the Work Plan with an extension to begin field work no later than 30 days from the receipt of this letter. The schedule is enforceable under the Brownfield Cleanup Agreement and is not 'tentative'. Further extensions to the approved schedule must be requested in writing and approved by the

NYSDEC. In addition, the Departments do not commit to the review schedule provided. Rather, the Departments will use all best efforts to approve, modify, or reject documents within 45 days of receipt in accordance with 6 NYCRR Part 375-3.6.

With the understanding that these modifications are agreed to, the Work Plan is hereby approved. If you choose not to accept these modifications, you are required to notify this office within 15 days after receipt of this letter and prior to the start of field activities. In this event, I suggest a meeting be scheduled to discuss your concerns prior to the end of this period.

Please notify me at least 7 days in advance of the start of field activities.

By November 11, 2020 or prior to the start of field activities, which ever comes first, please attach a copy of this letter to the Work Plan and distribute the approved Work Plan as follows:

- Tasha Mumbrue (1 hard copy with an original signature);
- Julia Kenney (NYSDOH, electronic file/CD)
- The document repository at the Richmond Memorial Library, located at 19 Ross Street, Batavia, NY14020 (1 bound hard copy).

If you have questions or concerns, please contact me at (585) 226-5459 or tasha.mumbrue@dec.ny.gov.

Sincerely,

Tasha Mumbrue
Geologist Trainee

ec: Ronald Hull, HNH LLP
Dennis Hoyt, GHD
Margaret Popek, GHD
Julia Kenney, NYSDOH
Justin Deming, NYSDOH
Michael Cruden, NYSDEC
David Pratt, NYSDEC
Frank Sowers, NYSDEC
Lisa Schwartz, NYSDEC

# Certification Statement

I Richard J. Snyder certify that I am currently a New York State (NYS) registered professional engineer or Qualified Environmental Professional as in defined in 6NYCRR Part 375 and that this Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the Division of Environmental Remediation (DER) Technical Guidance for Site Investigation and Remediation (DER-10).


Richard Snyder, P.E.
Associate & Senior Engineer

September 24, 2020
Date

# Table of Contents

# Figure Index



# Table Index

# 1. Introduction

## 1.1 Background

CNH Industrial Baumaschinen GmbH (CNH) has entered into the Brownfield Cleanup Program for the Ex-Eaton Site located at 34-40 Clinton Street in the City of Batavia, Genesee County, New York (Figure 1). The implementation of the remediation program is being completed in accordance with the Brownfield Cleanup Agreement (BCA) (Index Number C819022-03-19, New York State Department of Environmental Conservation (NYSDEC) Site No. C819022) between CNH and the NYSDEC. The Site was formerly in the Voluntary Cleanup Program (VCP). While in the VCP, CNH completed a number of on-Site and off-Site investigations to characterize the impacts resulting from historical operations at this Site. A Site plan is presented as Figure 2.

In May 2020, CNH sampled 23 on-Site and off-Site wells associated with the Site in order to provide an updated understanding of the concentrations and configurations of the volatile organic compound (VOC) plumes located at the Site and extending into off-Site areas relative to the Site-wide groundwater sampling event that was conducted in July 2010. The results from this pre-remedial groundwater confirmation sampling event are being used to provide a summary of current groundwater conditions at the Site in the Draft Site-Wide Remedial Investigation/Alternatives Analysis Report (RI/AAR) currently being prepared. A summary of the methods and results from the pre-remedial groundwater confirmation sampling event is presented in *Draft 2020 Pre-Remedial Groundwater Confirmation Monitoring Summary Letter Report, Ex-Eaton Site, NYSDEC Site No. C819022, Batavia, New York* (Draft Report), dated July 6, 2020, prepared by GHD on behalf of CNH for the NYSDEC.

The results from the May 2020 pre-remedial groundwater confirmation sampling event indicate that significant natural attenuation has occurred in groundwater both on-Site and off-Site since 2010. Maximum total VOC concentrations in the core of the plumes in Areas of Concern (AOCs) #1 and #2 and beneath the main building have decreased substantially, and the majority of the compounds that were detected at concentrations above the NYSDEC Class GA Groundwater Standards and Guidance Values (criteria) in 2020 were daughter compounds, further indicating that natural attenuation is occurring. The off-Site plume to the east of AOC #1 is in a similar configuration as in 2010, with daughter compounds detected only slightly above criteria. In the off-Site plume to the south of the main building, compounds were detected at concentrations above criteria in only one well (CRA-OSMW-009) of the four off-Site wells sampled in 2020. Groundwater at the Site flows to the south and southeast, with radial flow present east of the main building at URS-3.

Based on recent discussions with the NYSDEC following submittal of the Draft Report, it has been concluded that an additional round of groundwater sampling to confirm the results of the May 2020 sampling event would be beneficial in the evaluation of remedial alternatives for the Site, i.e., confirm that aggressive natural attenuation is occurring at the Site.

## 1.2 Purpose

This Supplemental 2020 Pre-Remedial Groundwater Confirmation Sampling Work Plan (Work Plan) has been prepared by GHD on behalf of CNH to outline the proposed scope of work associated with supplemental groundwater sampling activities at the Site to meet the following objectives:

- Confirm that natural attenuation is occurring at the Site, as indicated by the May 2020 groundwater sampling results.
- Demonstrate through the collection and analysis of additional chemical and biological data that monitored natural attenuation (MNA) is a viable remedial alternative for groundwater associated with the Site.

A detailed summary of the Site history and physical setting can be found in *2020 Pre-Remedial Groundwater Confirmation Sampling Work Plan, Ex-Eaton Site, 34-40 Clinton Street, Batavia, New York, Site No. C819022*, dated April 2020, prepared by CNH for the NYSDEC.

## 1.3 Work Plan Organization

The Work Plan is organized as follows:

- Section 1 - The purpose of the proposed Scope of Work and organization of the Work Plan are presented in Section 1
- Section 2 - The Scope of Work is presented and described in Section 2
- Section 3 – The reporting format for the groundwater sampling results is presented in Section 3
- Section 4 - The schedule for the implementation of the Work Plan is presented in Section 4
- Section 5 - Health and safety requirements are discussed in Section 5
- Section 6 - The Quality Assurance Project Plan (QAPP) is discussed in Section 6

# 2. Scope of Work

## 2.1 Well Selection

Based on a review of the 2010, 2015, and 2020 data and the south-southeasterly flow of groundwater at the Site, 29 monitoring wells have been selected for sampling. The locations of the 29 wells to be sampled are indicated on Figure 3. These wells were selected in order to confirm and supplement the data collected during the May 2020 event, and to further delineate current plume boundaries and to evaluate current groundwater conditions within the AOCs. Table 1 lists all of the wells associated with the Site and indicates whether the well was sampled in 2010, 2015, and/or May 2020. Table 1 also identifies the wells proposed to be sampled during the supplemental sampling event and the parameters to be analyzed for at each location.

## 2.2 Groundwater Sample Collection

### 2.2.1 Well Purging

Upon arrival at each well to be sampled, the water level will be measured using an electronic groundwater probe from the top of the well riser to the nearest 0.01 foot and will be recorded on the field monitoring log. The well will then be purged and sampled using United States Environmental Protection Agency (USEPA) low-flow sampling techniques with a peristaltic pump and dedicated disposable tubing. Field parameters including pH, temperature, conductivity, oxidation-reduction potential (ORP), dissolved oxygen, and turbidity of the purge water will be measured using a flow-through cell apparatus and/or hand-held equipment and recorded immediately while in the field. All meters will be calibrated daily in accordance with the manufacturer's instructions and a calibration record maintained in the field book. Purging will be considered complete (stabilization) once purged groundwater is generally free of sediment and the following conditions are met:

- Conductivity, temperature, and dissolved oxygen are within a range of plus or minus 10 percent of the average values for the last three readings
- pH is within a range of plus or minus 0.1 pH unit of the average value for the last three readings
- ORP is within a range of plus or minus 10 millivolts of the average value for the last three readings

Ideally, turbidity should be less than 50 nephelometric turbidity units (NTU) upon sampling.

If stabilization has not occurred after removal of three well volumes, purging will continue until a maximum of five well volumes has been removed, and then the well will be sampled. If a well goes dry before stabilization of field parameters occurs, the well will be sampled as soon as the well has recharged enough to provide a sample representative of groundwater in the formation. A final set of field parameters will be collected upon sampling.

Purged groundwater will also be inspected for sheen and odor. As performed during the May 2020 sampling event, following approval from the Superintendent of Water and Wastewater for the City of Batavia, purge water will be passed through a carboy/drum of granular activated carbon (GAC) and discharged to the municipal sanitary sewer system during the purging activities. Based on communications between CNH's consultant and the Superintendent of Water and Wastewater for the City of Batavia, no additional requirements will be necessary to discharge the water to the City sanitary sewer system, provided it is first passed through activated carbon before being discharged to the sewer. It is anticipated that the City will not require any additional sampling, testing, or permits for this work. The Bureau will be notified of the dates when the purging, sampling, and discharge activities will occur.

### 2.2.2 Groundwater Sampling and Laboratory Analysis

Groundwater samples will be collected directly from the low-flow equipment (peristaltic pump) tubing and will be placed into pre-cleaned, new, laboratory-supplied sample vials preserved with hydrochloric acid. The groundwater samples will be submitted to a New York State Department of Health (NYSDOH) Environmental Laboratory Accreditation Program (ELAP) certified laboratory for analysis of Target Compound List (TCL) VOCs via USEPA method SW-846 8260B.

In addition, to demonstrate that the biogeochemical conditions on-Site are favorable for natural biodegradation, groundwater samples from 25 wells will also be sampled for nitrate, nitrite, sulfate, and chloride; total and dissolved iron and manganese; total organic carbon; and ethane, ethene, and methane (collectively referred to as MNA parameters). These 25 wells are indicated on Table 1, and represent wells in the core of the plumes as well as at the plume boundaries.

Groundwater samples from nine wells will also be sampled for Gene-Trac® testing by SiREM laboratories. This test determines directly if the microorganisms necessary for anaerobic degradation of chlorinated solvents are present. The microorganisms Dehalococcoides, Dehalobacter, Dehalogenimonas, and Desulfitobacterium will be included in the testing. These microorganisms degrade tetrachloroethene (PCE), trichloroethene (TCE), trichloroethane (TCA), and dichloroethane (DCA). These nine wells are indicated on Table 1.

Trip blank(s), two blind field duplicate samples, and two matrix spike/matrix spike duplicate (MS/MSD) samples will be collected for all analyses except for the Gene-Trac® test.

All samples will be collected in accordance with the Site Field Sampling Plan (FSP, 2008), Site Health and Safety Plan (HASP, 2016), and Site Quality Assurance Project Plan (QAPP, 2015) previously submitted to the Department. The laboratory will be required to provide a Category B deliverable. All analytical data generated will be assessed and validated by a GHD Data Validator/Chemist per the QAPP and a data validation memo will be prepared. A Data Usability Summary Report (DUSR) will not be required. An electronic data deliverable (EDD) will also be generated for submittal and upload to the NYSDEC's EQuIS™ database.

# 3. Reporting

Following receipt and validation of the analytical results, the Draft Report summarizing the results of the May 2020 sampling event will be updated to include the results from supplemental sampling event. A more detailed description of the work performed and results will be included in the Draft RI/AAR. The updated summary letter will be submitted to the NYSDEC approximately two weeks following publication of the DUSR.

# 4. Schedule

The schedule for implementation of the Work Plan was provided in the approved schedule extension request letter dated August 31, 2020 (revised). The project schedule is subject to change only with the approval of the NYSDEC. Per the approved schedule extension request, the groundwater sampling event will be performed no later than the week of October 5, 2020. The NYSDEC will be notified at least seven calendar days prior to the start of field activities.

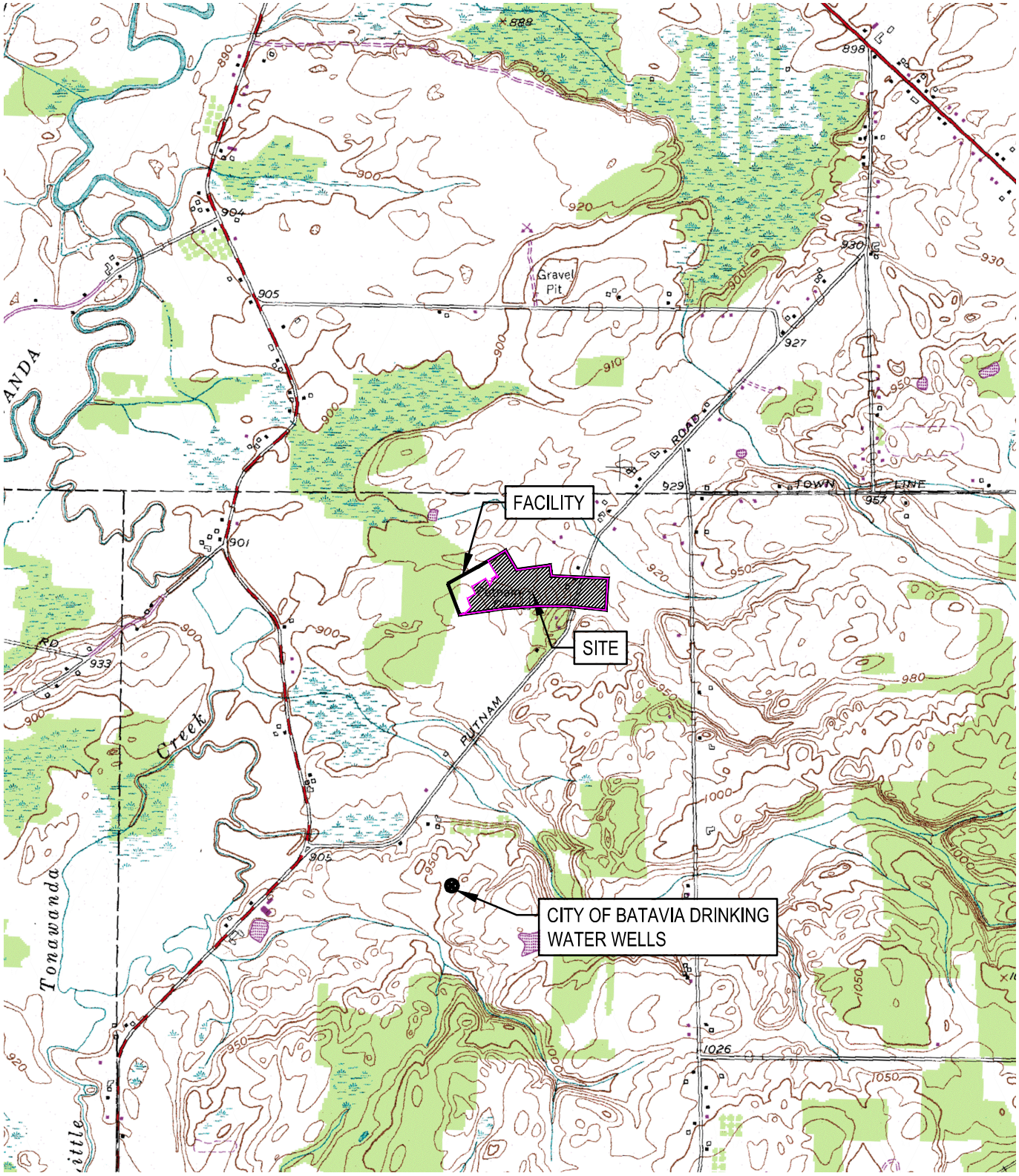
The raw, non-validated analytical data package from the sampling event will be provided to the NYSDEC within 2 weeks of data package delivery to GHD or as an attachment to the monthly progress report, whichever is earlier. It is anticipated that the updated Draft Report incorporating the results of the supplemental sampling event will be submitted to the NYSDEC no later than November 27, 2020. The Draft RI/AAR will be submitted to the NYSDEC for informal review no later than December 4, 2020.

# 5. Health and Safety

A HASP has been prepared for the Site in accordance with 29 Code of Federal Regulations (CFR) Part 1910 and 29 CFR 1926 and has been reviewed and signed by a health and safety professional. The HASP specifies protective measures and procedures to be followed during the completion of field activities to minimize exposure of workers and the surrounding community to hazardous Site-related materials. The HASP is a separate Site-specific document and was previously submitted and approved by the NYSDEC on March 3, 2008. The HASP was updated in 2016 to reflect more current information and safety-related policies/procedures and is reviewed annually. No changes to the document have occurred since the 2016 update.

# 6. Quality Assurance Project Plan

A QAPP has been prepared in accordance with the Resource Conservation and Recovery Act (RCRA) Quality Assurance Project Plan Guidance, NYSDEC, March 1991 and "EPA Guidance for Quality Assurance Project Plans", USEPA QA/G-5, USEPA/600/R-98/018, February 1998. The QAPP describes protocols necessary to achieve specified data quality objectives and is a separate Site-specific document. The QAPP was previously submitted in 2008 and approved by the NYSDEC. It was updated in 2015.




SOURCE: USGS QUADRANGLE MAPS; BATAVIA NORTH AND BATAVIA SOUTH, NEW YORK, 2015

NOTE: SITE BOUNDARIES ARE APPROXIMATE.

N

0 2000'

**EX-EATON SITE (C819022)**
**2020 SUPPLEMENTAL PRE-REMEDIAL GROUNDWATER CONFIRMATION SAMPLING WORK PLAN**

**SITE LOCATION AND VICINITY MAP**

Project No. **048547**
Report No. **034**
Date **SEP 2020**

# FIGURE 1

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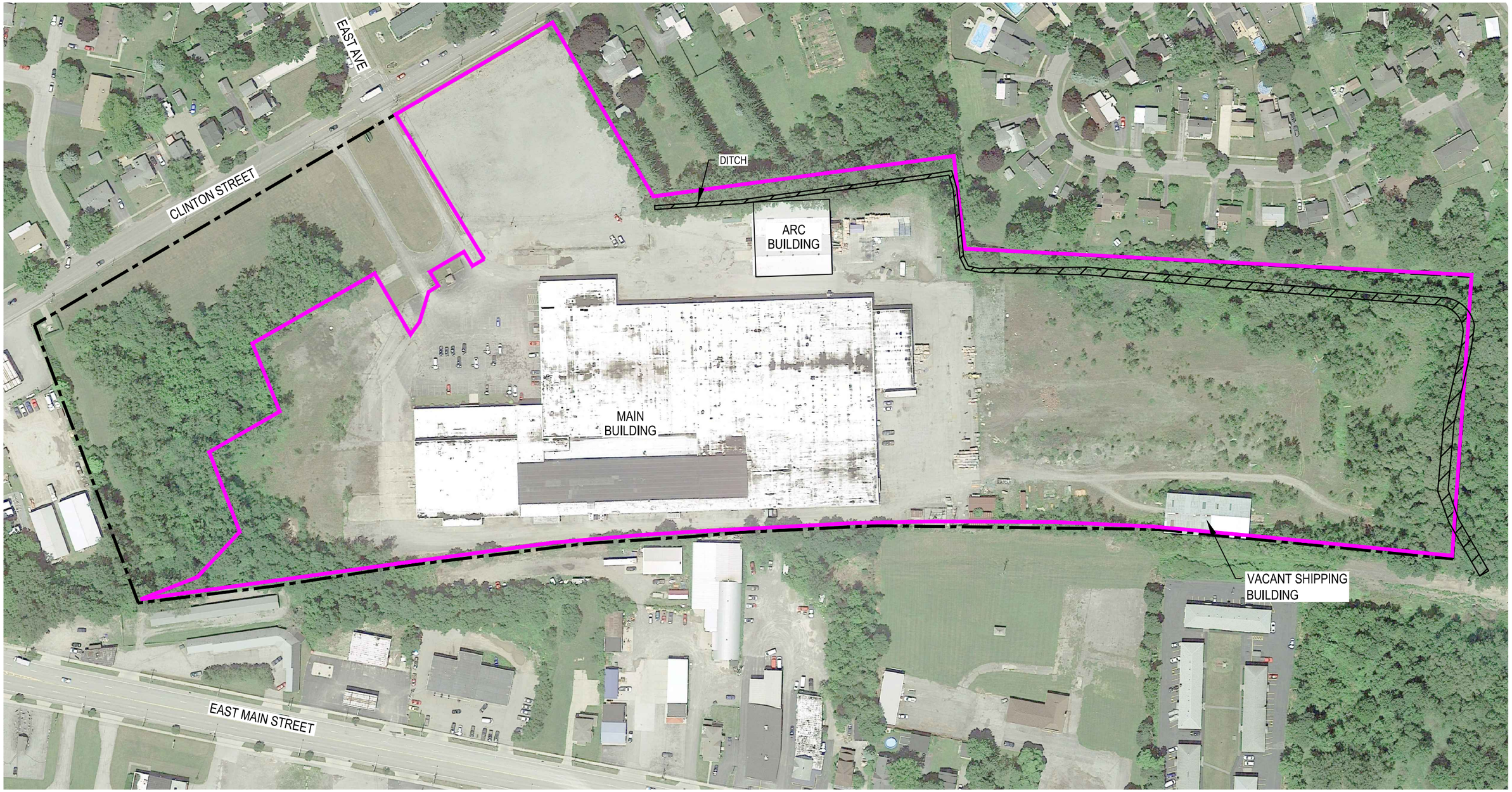


LEGEND

- DRAINAGE DITCH
- BROWNFIELD SITE BOUNDARY
- PROPERTY BOUNDARY

N

0 150'

GHD

**EX-EATON SITE (C819022)**
**2020 SUPPLEMENTAL PRE-REMEDIAL GROUNDWATER CONFIRMATION SAMPLING WORK PLAN**

**SITE PLAN**

Project No. **048547**
Report No. **035**
Date **SEP 2020**

**FIGURE 2**

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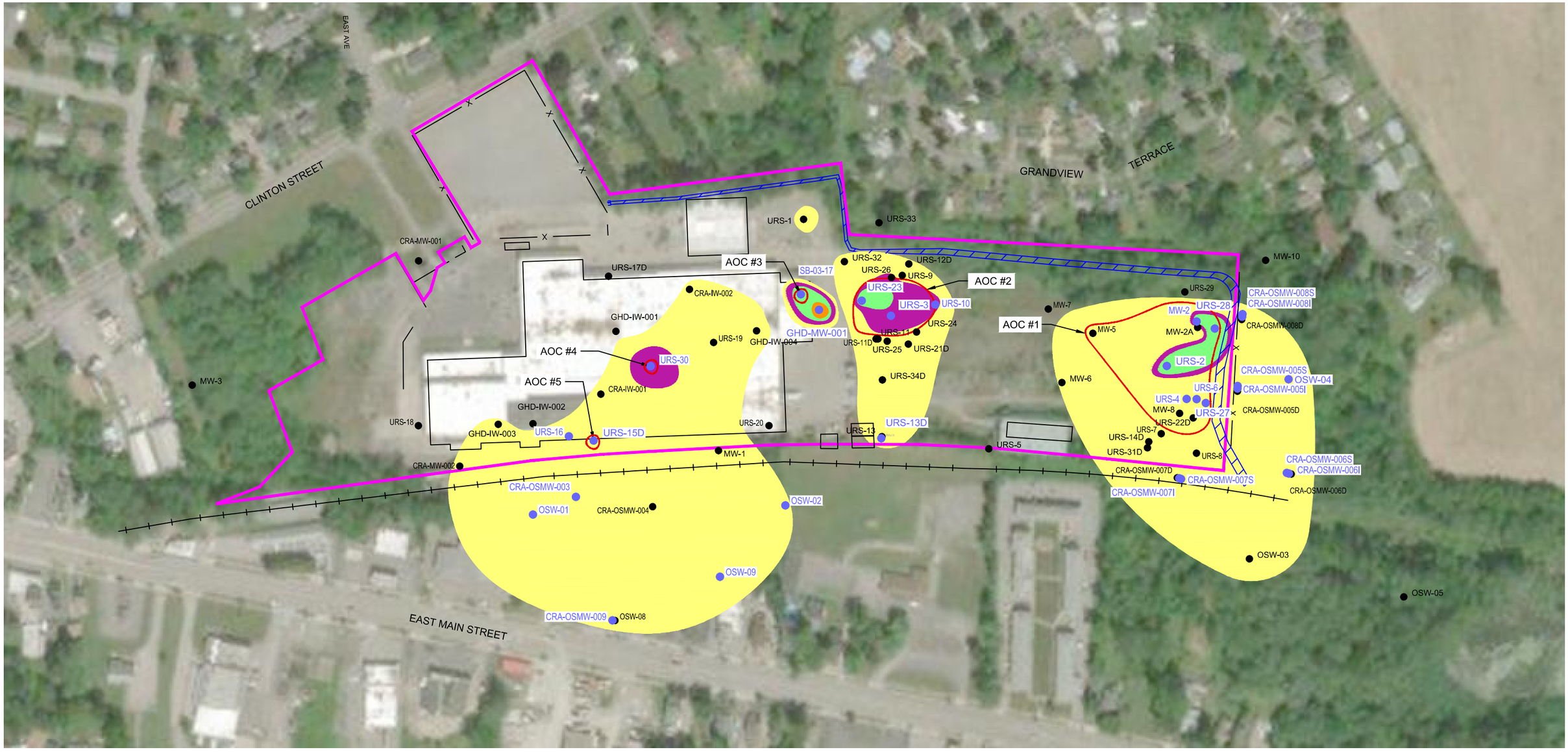


## LEGEND

- MONITORING WELL
- PROPOSED SAMPLING LOCATION
- FENCE LINE
- FORMER ERIE RAILROAD
- DRAINAGE DITCH
- SITE
- FACILITY
- LIMIT OF AOC

## TOTAL VOC GROUNDWATER CONCENTRATIONS

- = < 100 PPB
- = 100 - 1,000 PPB
- = 1,000 - 10,000 PPB
- = 10,000 - 50,000 PPB
- = 50,000 - 100,000 PPB
- = >100,000 PPB

## NOTES:

1. PLUMES WERE DEVELOPED USING TOTAL VOC DATA FROM THE JULY 2010 GROUNDWATER SAMPLING EVENT AND UPDATED WITH TOTAL VOC DATA FROM THE MAY 2020 SAMPLING EVENT.
2. AOCs #1 THROUGH #3 ARE DEFINED BY THE LIMITS OF THE PART 375 UNRESTRICTED SOIL CLEANUP OBJECTIVES VOC EXCEEDANCES IN SOIL.
3. AOCs #4 AND #5 ARE DEFINED AS SUSPECTED HISTORICAL SOURCE AREAS FOR GROUNDWATER VOC EXCEEDANCES BENEATH THE MAIN BUILDING.
4. SITE BOUNDARIES ARE APPROXIMATE.

N

0 150'

GHD

**EX-EATON SITE (C819022)**
**2020 SUPPLEMENTAL PRE-REMEDIAL GROUNDWATER CONFIRMATION SAMPLING WORK PLAN**
**PROPOSED SUPPLEMENTAL GROUNDWATER SAMPLING LOCATIONS**

Project No. **048547**
Report No. **035**
Date **SEP 2020**

# FIGURE 3

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**Table 1**

**Monitoring Well Sampling Matrix**
**2020 Supplemental Pre-Remedial Groundwater Confirmation Sampling Work Plan**
**Ex-Eaton Site (C819022)**
**Brownfield Cleanup Program**

| Well ID | Screen Elevation (ft bgs) | July 2010 Sampling Event | September 2015 Sampling Event | May 2020 Sampling Event | Supplemental 2020 Sampling Event (Proposed) | Rationale for Sampling in Supplemental Event |
|---|---|---|---|---|---|---|
| CRA-IW-001 | 7.0 to 12.0 | X | X | | | |
| CRA-IW-002 | 7.0 to 12.0 | X | X | | | |
| CRA-MW-001 | 10.1 to 20.1 | X | | X | | |
| CRA-MW-002 | 9.9 to 19.9 | X | | X | | |
| CRA-OSMW-003 | 8.1 to 18.1 | X | | X | **VOCs, MNA, Gene-Trac®** | Confirm VOC impacts off-site to south are below or near criteria |
| CRA-OSMW-004 | 7.8 to 17.8 | X | | Could not locate | | |
| CRA-OSMW-005D | 41.9 to 51.9 | X | | | | |
| CRA-OSMW-005I | 29.5 to 39.5 | X | | X | **VOCs, MNA** | Determine if concentrations are stable over the short-term |
| CRA-OSMW-005S | 4.9 to 14.9 | X | | | **VOCs** | Confirm plume boundary in shallow zone (i.e., no migration since 2010) |
| CRA-OSMW-006D | 49.0 to 59.0 | X | | | | |
| CRA-OSMW-006I | 24.0 to 34.0 | X | | X | **VOCs, MNA, Gene-Trac®** | Determine if concentrations are stable over the short-term |
| CRA-OSMW-006S | 4.2 to 14.2 | X | | | **VOCs** | Confirm plume boundary in shallow zone (i.e., no migration since 2010) |
| CRA-OSMW-007D | 44.3 to 54.3 | X | | X | | |
| CRA-OSMW-007I | 24.8 to 34.8 | X | | X | **VOCs, MNA** | Determine if concentrations are stable over the short-term |
| CRA-OSMW-007S | 9.9 to 14.9 | X | | | **VOCs** | Confirm plume boundary in shallow zone (i.e., no migration since 2010) |
| CRA-OSMW-008D | 49.5 to 59.5 | X | | | | |
| CRA-OSMW-008I | 35.2 to 45.2 | X | | X | **VOCs, MNA** | Determine if concentrations are stable over the short-term |
| CRA-OSMW-008S | 4.7 to 14.7 | X | | | **VOCs** | Determine if elevated concentration of chloroethane detected in 2010 has changed |
| CRA-OSMW-009 | 53.8 to 63.8 | X | | X | **VOCs, MNA** | Confirm VOC impacts off-site to south are below or near criteria |
| MW-1 | 5.9 to 15.9 | X | | | | |
| MW-2 | 3.9 to 13.9 | X | | X | **VOCs, MNA** | Determine if concentrations are stable over the short-term |
| MW-2A | 61.0 to 71.0 | X | | | | |
| MW-3 | 9.1 to 18.1 | X | | | | |
| MW-5 | 13.8 to 23.8 | X | | Destroyed | | |
| MW-6 | 7.8 to 17.8 | X | | X | | |
| MW-7 | 5.8 to 15.8 | X | | Destroyed | | |
| MW-8 | 8.0 to 18.0 | X | | | | |
| MW-10 | 7.8 to 17.8 | X | | X | | |
| OSW-01 | 9.3 to 19,3 | X | | | **VOCs, MNA** | Confirm VOC impacts off-site to south are below or near criteria |
| OSW-02 | 15.7 to 25.7 | X | | X | **VOCs, MNA** | Confirm VOC impacts off-site to south are below or near criteria |
| OSW-03 | 10.0 to 20..0 | X | | X | | |
| OSW-04 | 19.7 to 29.7 | X | | X | **VOCs, MNA** | Determine if concentrations are stable over the short-term |
| OSW-05 | 24.0 to 34.0 | X | | | | |
| OSW-06 | 19.7 to 29.7 | X | | | | |
| OSW-07 | 20.0 to 30.0 | X | | | | |
| OSW-08 | 20.0 to 30.0 | X | | | | |
| OSW-09 | 16.8 to 26.8 | X | | X | **VOCs, MNA** | Confirm VOC impacts off-site to south are below or near criteria |
| SB-03-17 | 5.0 to 15.0 | X | X | | **VOCs, MNA, Gene-Trac®** | Determine if high concentration of chloroethane detected in 2015 has changed |
| URS-1 | 18.0 to 28.0 | X | | | | |
| URS-2 | 19.7 to 29.7 | X | | | **VOCs, MNA** | Determine if high concentration of chloroethane detected in 2010 has changed |
| URS-3 | 7.1 to 17.1 | X | | X | **VOCs, MNA** | Confirm significant decreases in VOC concentrations observed in May 2020 |
| URS-4 | 2.9 to 12.9 | X | | | **VOCs, MNA** | Confirm suspected decreases in VOC concentrations due to proximity to URS-6 |
| URS-5 | 10.1 to 20.1 | X | | | | |

**Table 1**

**Monitoring Well Sampling Matrix**
**2020 Supplemental Pre-Remedial Groundwater Confirmation Sampling Work Plan**
**Ex-Eaton Site (C819022)**
**Brownfield Cleanup Program**

| Well ID | Screen Elevation (ft bgs) | July 2010 Sampling Event | September 2015 Sampling Event | May 2020 Sampling Event | Supplemental 2020 Sampling Event (Proposed) | Rationale for Sampling in Supplemental Event |
|---|---|---|---|---|---|---|
| URS-6 | 4.5 to 14.5 | X | | X | **VOCs, MNA** | Confirm significant decreases in VOC concentrations observed in May 2020 |
| URS-7 | 2.7 to 6.7 | X | | | | |
| URS-8 | 5.8 to 15.8 | X | | | | |
| URS-9 | 1.8 to 6.8 | X | | | | |
| URS-10 | 2.9 to 7.9 | X | | | **VOCs, MNA** | Evaluate plume boundary in AOC #2 |
| URS-11 | 1.9 to 6.9 | X | | | | |
| URS-11D | 27.9 to 37.9 | X | | X | | |
| URS-12D | 16.1 to 26.1 | X | | | | |
| URS-13 | 1.0 to 5.0 | | | | | |
| URS-13D | 9.1 to 19.1 | X | | X | **VOCs, MNA, Gene-Trac®** | Determine if concentrations are stable over the short-term |
| URS-14D | 7.0 to 17.0 | X | | | | |
| URS-15D | 9.0 to 19.0 | X | X | | **VOCs, MNA, Gene-Trac®** | Determine if parent compounds detected in 2015 are still present |
| URS-16 | 7.1 to 16.1 | X | X | | **VOCs, MNA** | Determine if parent compounds detected in 2015 are still present |
| URS-17D | 6.8 to 16.8 | X | X | | | |
| URS-18 | 3.0 to 13.0 | X | X | | | |
| URS-19 | 7.1 to 17.1 | X | X | | | |
| URS-20 | 7.0 to 17.0 | X | | | | |
| URS-21D | 55.1 to 65.1 | X | | | | |
| URS-22D | 50.0 to 60.0 | X | | | | |
| URS-23 | 5.0 to 15.0 | X | X | | **VOCs, MNA, Gene-Trac®** | Determine if high concentration of chloroethane detected in 2010 has changed |
| URS-24 | 5.0 to 15.0 | X | | X | | |
| URS-25 | 5.1 to 15.1 | X | | | | |
| URS-26 | 5.0 to 15.0 | X | | | | |
| URS-27 | 5.0 to 15.0 | X | | | **VOCs, MNA, Gene-Trac®** | Confirm suspected decreases in VOC concentrations due to proximity to URS-6 |
| URS-28 | 4.9 to 14.9 | X | | X | **VOCs, MNA** | Confirm significant decrease in chloroethane concentration observed in May 2020 |
| URS-29 | 7.2 to 12.2 | X | | | | |
| URS-30 | 10.0 to 15.0 | X | X | | **VOCs, MNA, Gene-Trac®** | Determine if elevated concentration of cis-1,2-DCE detected in 2015 has changed |
| URS-31D | 28.9 to 38.9 | X | | | | |
| URS-32 | 4.9 to 9.9 | X | | | | |
| URS-33 | 5.6 to 10.6 | X | | | | |
| URS-34D | 44.5 to 55.5 | X | | X | | |
| GHD-IW-001 | 8.0 to 13.0 | | X | | | |
| GHD-IW-002 | 6.0 to 13.0 | | X | | | |
| GHD-IW-003 | 5.0 to 10.0 | | X | | | |
| GHD-IW-004 | 6.0 to 11.0 | | X | Could not locate | | |
| GHD-MW-001 | 6.0 to 11.0 | | X | | **VOCs, MNA, Gene-Trac®** | Determine if high concentration of chloroethane detected in 2015 has changed |

Notes:

**MNA** =Nitrate, nitrite, sulfate, chloride, total & dissolved iron, total & dissolved manganese, total organic carbon, and dissolved gases (ethane, ethene, methane)

**VOCs** =TCL VOCs

**Gene-Trac®** = DHC (Dehalococcoides) + DHb (Dehalobacter) + DHg (Dehalogenimonas) + DSb (Desulfitobacterium)


# about GHD

GHD is one of the world's leading professional services companies operating in the global markets of water, energy and resources, environment, property and buildings, and transportation. We provide engineering, environmental, and construction services to private and public sector clients.

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