April 26, 2007

Mr. Maurice Moore New York State Department of Environmental Conservation 270 Michigan Avenue Buffalo, New York 14203-2999

Subject:

Sub-slab Soil Investigation Work Plan Former Champion Products Facility 200 North Main Street, Perry, New York

VCP No. V000189-9 Delta Project No. 0610756P

Dear Mr. Moore:

On behalf of the Hanesbrands, Inc., Delta Consultants (Delta) is presenting the following Sub-slab Soil Investigation (SSI) Work Plan for the above noted facility for review and approval by the New York State Department of Environmental Conservation (NYSDEC).

SITE BACKGROUND

The former Champion Products facility was owned and operated from 1955 until 1998 by Champion, an affiliate of the Sara Lee Corporation. In 1998, the property was sold to SMG Development Corporation. Champion leased the building from SMG and continued operations until December 2001. American Classic Outfitters (ACO) was formed and commenced its operations at the site in January 2002. Irrespective of ownership, the facility has been primarily used since 1955 for the manufacture of print screen apparel for sports teams and retail sale.

Chlorinated and non-chlorinated solvents were identified in the soil and groundwater underlying the warehouse and manufacturing building. Champion Products entered into a Voluntary Cleanup Agreement in 2000 with the NYSDEC for the remediation of the site. Hanesbrands, Inc. is now performing the activities of Champion Products under the Agreement. Since 2000, several site investigations and remedial activities have occurred, including the design, installation and operation of a dual phase vapor extraction system (DPVE).

The DPVE system was placed in operation in July 2000 and recently shutdown in February 2007, as significant reductions in volatile organic compound (VOC) levels have been achieved and it is unlikely that any additional benefit will be derived from the continued operation of the system. Site-wide dissolved phase VOC levels have decreased by an average of 87 percent since system start-up.

The shutdown plan for the DPVE was submitted to NYSDEC on February 27, 2007 and approved by the Department on March 5, 2007. The shutdown plan outlined the activities envisioned for site closure, including the performance of a sub-slab soil investigation within the remaining source area. This SSI Work Plan has been prepared pursuant to the shutdown plan.





PURPOSE AND SCOPE

Completed site remedial activities suggest the continued presence of VOCs beneath the northwest portion of the former Champion Products warehouse and manufacturing building. An evaluation of residual soil VOC levels within the remaining source area will be performed.

The scope of work presented herewith is intended to update the findings of a previous sub-slab investigation completed in February 2003 and to permit comparison of these results to the Remedial Program Soil Cleanup Objectives as presented in 6 NYCRR Subpart 375-6. These regulations became effective on December 14, 2006

Based upon a meeting held with NYSDEC on November 8, 2006, it is our understanding that NYSDEC maintains that the new Subpart 375-6 Remedial Program Soil Cleanup Objectives are applicable to the former Champion Products site and supersede any previous soil cleanup objectives used in the past, including Technical and Administrative Guidance Memorandum (TAGM) 4046, "Determination of Soil Cleanup Objectives and Cleanup Levels," dated January 24, 1994¹.

With the findings from this effort, and other ongoing evaluations being conducted at the site (including a baseline soil vapor intrusion survey and groundwater monitoring to evaluate the potential for rebound), an evaluation will be performed to determine if additional remediation is required.

2003 SITE CHARACTERIZATION STUDY

A sub-slab site characterization study was performed in February 2003. The results of this investigation were provided in a report entitled, "Results of February 2003 Site Characterization and Proposed Modifications to Final Remediation Work Plan," dated June 2003.

The purpose of this investigation was obtain soil samples from two impacted areas – the Former Manual Screen Area and the Current Screen Wash Area – that were identified as part of the "Final Remediation Work Plan," dated February 2000 and to assess the effectiveness of the DPVE system that had been operational for a period of approximately 2.5 years at the time of this study.

For the 2003 study, 18 geoprobe borings were installed in the Former Manual Screen Wash Area and 7 borings in the Current Screen Wash Area. A total of 35 soil samples were collected and analyzed for VOCs.

Figure 1 presents the location of the installations performed as part of the 2003 site characterization study. Table 1 presents the soil analytical results obtained from this effort as compared to TAGM 4046.

Figure 2 presents the change in the impacted area between samples collected in 1998 versus 2003. Table 2 presents the reductions observed in VOC concentrations between these two periods.

Key conclusions applicable to the currently proposed work plan are presented below. Reference is made to the June 2003 report for additional details.

- The DPVE system removed approximately 51 to 99.9 percent of the VOCs from soil in both screen wash areas since start-up in July 2000.
- Toluene, total xylenes and carbon disulfide were identified in the soil beneath the Former Manual Screen Wash Area at concentrations in excess of TAGM 4046 at locations SCRW-5, SCRW-8 and SCRW-10.
- Dissolved phase VOCs within the Former Manual Screen Wash Area were reduced approximately 78 to 100 percent with impacts specifically identified in the vicinity of monitoring wells SCRW-05 and MW-106 at areas outside of the extraction wells radii of influence.

¹ Please note that Hanesbrands is reserving its rights with regard to the applicability of specific cleanup objectives to the site.

The soil results obtained from the Current Screen Wash Area did not exceed TAGM 4046 levels.
 The soil within this area was not considered a source of dissolved phase VOC present at monitoring well MW-107.

The 2003 site characterization study recommended DPVE system enhancements to remove the residual and dissolved phase VOCs identified. The following system upgrades were implemented:

- The removal of extraction wells DVE-103, DVE-104 and DVE-105 due to the absence of VOCs above the NYSDEC 6 NYCRR Part 703 Surface Water and Groundwater Quality Standards.
- The installation of two additional extraction wells, DVE-108 and DVE-109, within the Former Manual Screen Wash Area.
- The conversion of monitoring well MW-107 into an extraction well for localized dissolved phase VOC removal.

Treatment continued in this manner with some additional modifications until the system was shutdown in February 2007. Modifications specifically directed at enhancing residual and dissolved phase VOC removal included periodic connection of monitoring wells MW-107 and SCRW-05 to the wellheads of extraction wells DVE-107 and DVE-108, respectively.

COMPARISON TO 6 NYCRR SUBPART 375-6 REMEDIAL PROGRAM SOIL CLEANUP OBJECTIVES

As noted above, the 6 NYCRR Subpart 375-6 Remedial Program Soil Cleanup Objectives became effective December 14, 2006. These regulations include soil cleanup objectives that are based upon current, intended or reasonably intended land uses for contaminated sites. Soil cleanup objectives are provided for both unrestricted and restricted uses.

Unrestricted use soil cleanup objectives represent the concentration of a contaminant in soil which, when achieved at a site, will require no use restrictions for the protection of public health, groundwater or ecological resources due to the presence of contaminants at the site.

Restricted use soil cleanup objectives are protective of public health at every restricted use site where contamination has been identified in soil above the protection limit for a particular use: residential, restricted-residential, commercial or industrial. In addition to these restricted use soil cleanup objectives, protection of groundwater and ecological resources soil cleanup objectives are also considered where applicable.

Table 1 presents a retrospective comparison of the results obtained from the 2003 site characterization study to the soil cleanup objectives provided under Subpart 375-6. This comparison was performed to determine *if* any exceedances would have existed had these objectives been in effect and applicable at the time of the prior study, and to assist in determining where additional soil sampling should be performed to update and/or validate the historic soil sampling results.

This comparison indicates the following:

Former Manual Screen Wash Area

- Exceedances of unrestricted soil cleanup objectives would have or potentially have existed for several VOC compounds (methylene chloride, acetone, 1,1-dichloroethane, toluene and total xylenes)².
- o No exceedances would have been existed for any form of restricted use for the protection of public health.
- Exceedances would have or potentially existed for protection of groundwater resources for several VOCs (methylene chloride, acetone, 1,1-dichloroethane, toluene and total xylenes)².

² Potential exceedances were assumed based upon a comparison between the potentially applicable Part 375 Soil Cleanup Objective and the reported analytical detection limit where the reported analytical detection limit is greater than the soil cleanup objective.

 Only the total xylene levels would have exceeded the protection of ecological resources soil cleanup objective.

Current Screen Wash Area

- Slight exceedances of unrestricted and protection of groundwater soil cleanup objectives would have existed only for acetone.
- No exceedances would have been existed for any form of restricted use for the protection of public health or ecological resources.

This comparison suggests that additional soil samples should be collected in the vicinity of the Former Manual Screen Wash Area. This is conclusion is also supported by groundwater data as presented in isoconcentration maps provided in the annual "Remediation Monitoring Report, April 2005-December 2005," dated May 2006 and an update to this report submitted to NYSDEC on September 20, 2006. Reference is made to these reports for specific details.

For the Current Screen Wash Area, this comparison does not suggest that elevated soil levels are present. However, some remaining groundwater exceedances of Part 703 standards are still present within this area. As such, soil samples should be collected to validate the continued absence of soil VOC impacts as was previously observed.

SCOPE OF WORK

The following activities will be performed as part of the SSI Work Plan:

Task 1: Pre-Mobilization Meeting

As with the 2003 sampling effort, careful coordination with ACO facility personnel will be required prior to the performance of this scope of work. The objectives of this task will be as follows:

- Establish drill rig access requirements and logistics. It is anticipated that a skid-mounted rig will be
 required to perform the work. The rig will more than likely enter the ACO building via the loading
 dock and be transported to interior locations to permit sampling. Upfront planning will be required to
 determine how this rig will be transported to the proposed sampling locations, overhead and utility
 clearance requirements, etc.
- Establish a drilling schedule. Given the nature of ACO's production operations, employee safety concerns and the potential noise associated with the work, the work will be performed over a weekend.

A meeting will be held between ACO, Delta and the selected driller to discuss and plan the proposed field work presented in Task 2.

A site-specific health and safety plan (HASP) will be prepared as part of this effort and will be available onsite during the performance of the work.

Task 2: Sampling and Analysis Plan

Sub-slab soil samples will be collected from 5 locations as depicted in Figure 3 as follows:

- Former Manual Screen Wash Area -- Adjacent to existing monitoring or extraction wells MW-106 and DVE-109; and between SCRW-05 and DVE-108
- Current Screen Wash Area -- Adjacent to existing monitoring wells: CSW-01 and MW-107

All proposed locations will be field-verified as part of Task 1. Any changes in locations will be re-confirmed with NYSDEC prior to the collection of samples.

Soil borings will be performed with the use of a skid-mounted geoprobe drill rig. The concrete floor within the ACO building will be cored prior to the installation of any boring. Commencing at ground surface, continuous 4-foot soil samples will be obtained with the use of a geoprobe sampler, lined with a dedicated PVC sample liner. The depth of the borings will be to a 12 to 16 feet below ground surface (bgs). This depth is similar to the depth that was used during the previous 2003 site characterization study.

Samples exhibiting the highest VOC reading using a photoionization detector (PID) will be collected for analysis. If no elevated PID readings are detected, a sample will be collected from either the higher permeable sand and gravel unit that is present at 8 to 12 feet bgs, where encountered, or the base of the boring.

Each soil sample will be classified with respect to lithology, moisture content, sheens and odors and other pertinent field observations. Information will be recorded in a field notebook. A soil boring log will be prepared for each soil boring location.

All downhole drilling equipment will be washed with Alconox and rinsed with deionized water between boring locations to ensure cross-contamination does not occur. All decon water will be containerized for subsequent off-site disposal.

All drill cuttings will be used to backfill the geoprobe boring holes. Concrete patch will be applied to repair any holes created by the geoprobe on the slab.

All samples will be analyzed for EPA 8021 VOC list using EPA Method 8260B. The EPA 8021 VOC list is the current list analyzed as a part of the ongoing groundwater monitoring program. All analytical work will be performed by a New York State Department of Health (NYSDOH) Environmental Laboratory Program (ELAP) certified laboratory and using the analytical procedures consistent with the latest NYSDEC Analytical Services Protocol (ASP). Severn Trent Laboratories (STL), Burlington, VT, a NYSDOH ELAP-certified laboratory, will be retained to perform the laboratory analyses.

Approval from the Department is requested for the following variances from the draft DER-10 Technical Guidance for Site Investigation and Remediation, dated December 2002:

- Submittal of ASP A Deliverable Data Packages as this has been the accepted level
 of deliverable provided throughout this project. Submittal of the more detailed and costly ASP B
 Deliverable Date Packages at this point in the project will not provide any significant benefit in terms of
 improved data quality for either site delineation or remediation purposes.
- No collection of duplicate, matrix spike or matrix spike duplicate samples. The same rationale as presented in the previous item applies.
- Acceptance of ASP A Deliverable Data Packages as acceptable for final delineation and remediation purposes assuming that the soil boring work completes the additional delineation required to demonstrate compliance with the 6 NYCRR Subpart 375-6 Remedial Program Soil Cleanup Objectives.

Task 3: Report

A report will be prepared that presents the results of the SSI activities and will include the following information:

- Introduction
- Background Summary
- Sampling Program Description (including any modifications to the approved work plan due to field conditions)
- Sampling Results and Analysis

Conclusions and Recommendations

As part of the report, a Data Usability Summary Report (DUSR) will be prepared by a NYSDEC-approved data validation chemist.

The results will be compared to the 6 NYCRR Subpart 375-6 Remedial Program Soil Cleanup Objectives.

Appropriate tables, figures and appendices will be provided as necessary.

SCHEDULE

The following schedule is envisioned for the performance of this SSI Work Plan:

Activity	Completion Date				
Submittal of Work Plan	April 26, 2007				
NYSDEC Comments	May 4, 2007				
Pre-Mobilization Meeting	May 4, 2007				
Response to Comments/Work Plan Approval	May 11, 2007				
Sample Collection	May 19-20, 2007				
Sample Analysis	June 4, 2007				
Report	July 2, 2007				

Please note that this schedule is predicated on the need to complete the SSI Work Plan prior to the busy production schedule for ACO that starts the end of May. Any NYSDEC review timeframes are assumed.

CLOSING

We trust that this SSI Work Plan is consistent with our previous discussions and the approved shutdown plan. We would appreciate an expedited review of this work plan and request a conference call following the Department's review to address and resolve any questions or comments, if necessary.

Please do not hesitate to contact me at (914) 765-0258 or by e-mail at asavino@deltaenv.com.

Sincerely,

DELTA ENVIRONMENTAL CONSULTANTS, INC.

Anthony Savin¢ | Senior Consultant

Enclosures:

Figure 1 2003 Site Characterization Study Sample Locations

Figure 2 Historic Areas Exceeding TAGM 4046 Cleanup Criteria (1998 vs. 2003)

Figure 3 Proposed Sub-Slab Sample Locations

Table 1 2003 Site Characterization Study Soil Analytical Results

Table 2 Volatile Organic Soil Reductions (1998-2003)

cc: Tommy Thompson, Hanesbrands

Maureen Crough, Sidley Austin Brown & Wood

Sam Gullo, American Classic Outfitters

Paul Sylvestri, Harter Secrest & Emery, LLP

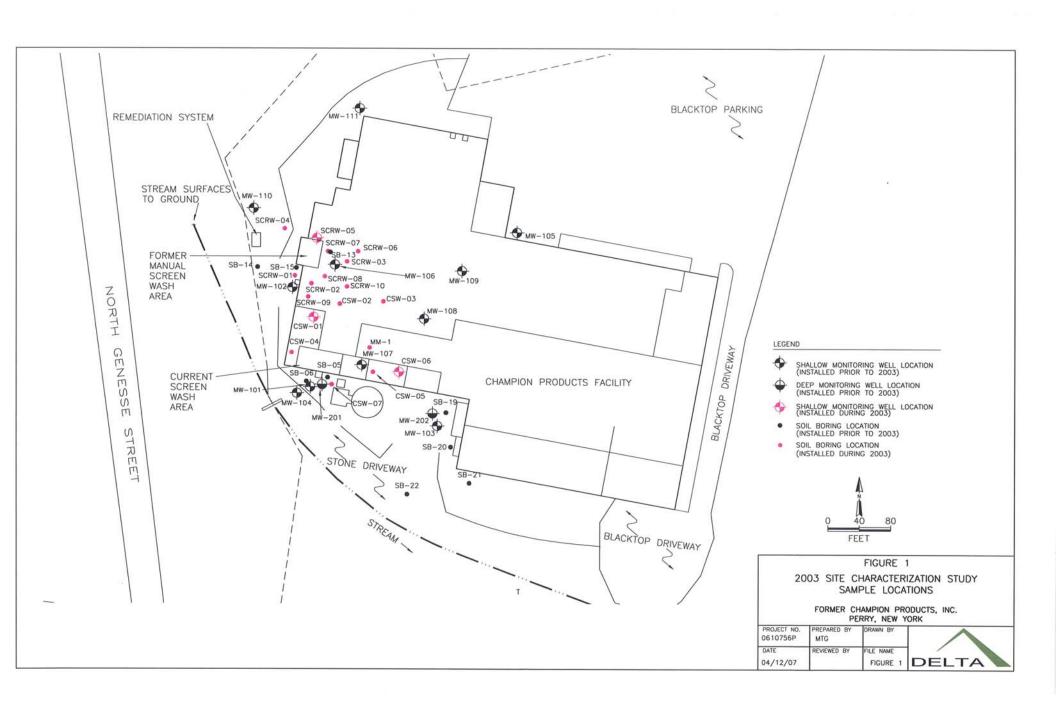
Martin Doster, NYSDEC

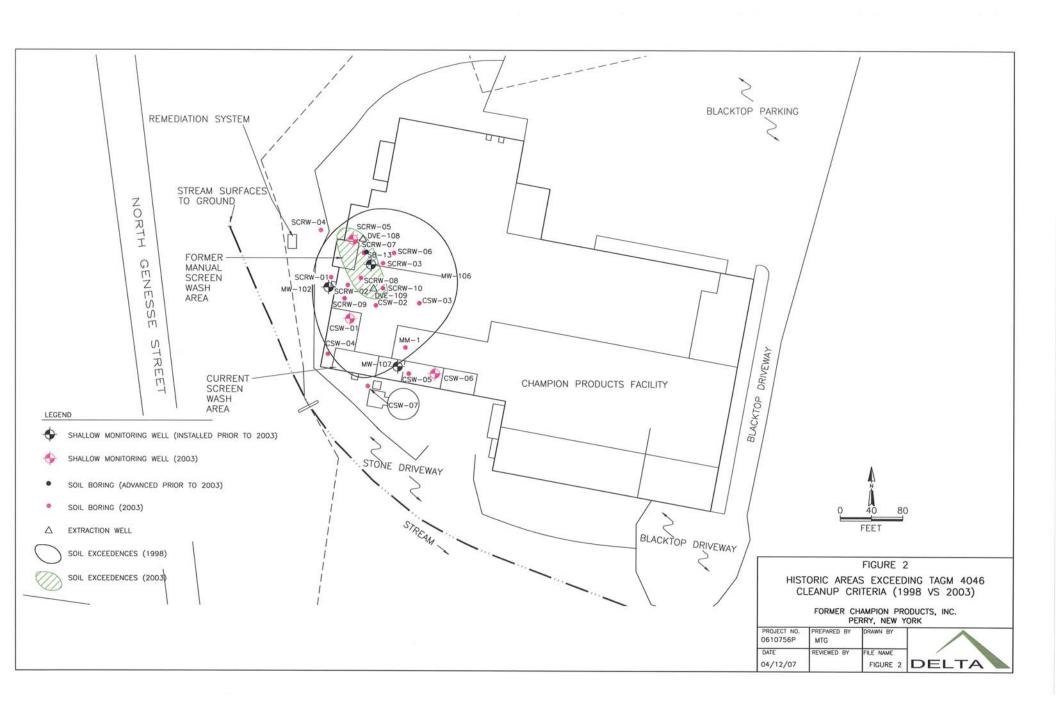
Ed Belmore, NYSDEC

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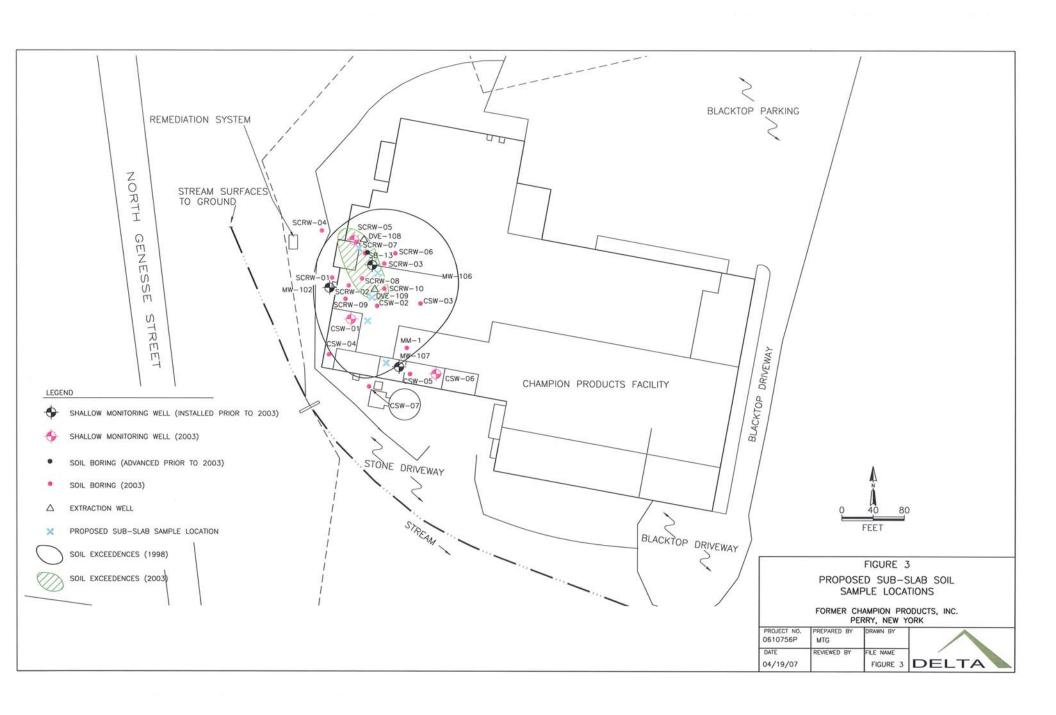


TABLE 1
2003 SITE CHARACTERIZATION STUDY SAMPLE LOCATIONS

SCRW-1		METHYLENE	Control of the Contro	CARBON		No. of the Control of		the state of the s	ETUVI	TOTAL
SCRW-1	DEPTH (FEET)	CHLORIDE	ACETONE	DISULFIDE	DCA	TCA	PCE	TOLUENE	ETHYL- BENZENE	TOTAL XYLENES
	4.5 - 5.0	13	28	<3	<3	<3	<3	<3	<3	<3
	14 - 15	<3	45	<3	<3	<3	<3	<3	<3	<3
SCRW-2	9.0 - 9.5	<280	<950	<280	<280	<280	<280	<280	<280	<280
	14.5 - 15.0	<3	64	<3	<3	<3	<3	8	<3	5
SCRW-3	7.5 - 8.0	<3	37	<3	10	<3	<3	<3	<3	<3
	10.7 - 11.2	<280	<940	<280	<280	<280	<280	<280	<280	<280
SCRW-4	6.5 - 7.0	<3	19	<3	<3	<3	6	8	<3	5
	9.0 - 9.5	<3	30	<3	<3	7	200	<3	<3	<3
SCRW-5	9.0 - 9.5	<270	<920	<270	<270	<270	<270	300	<270	<270
	10.0 - 10.5	<280	<930	<280	<280	<280	<280	2600	<280	<280
SCRW-6	9.0 - 9.5	<3	86	<3	7	<3	4	13	8	10
	14.5 - 15.0	<3	46	<3	<3	<3	<3	5	<3	<3
SCRW-7	10.0 - 10.5	<16	110	<16	<16	<16	<16	270	<16	<16
	14.5 - 15.0	<3	39	<3	<3	<3	<3	120	<3	4
SCRW-8	8.0 - 8.5	<3	49	<3	22	<3	10	20	<3	5
	10.5 - 11.0	<540	<180	<540	<540	<540	<540	4400	<540	2.040
SCRW-9	6.5 - 7.0	<3	28	<3	<3	<3	<3	7	<3	<3
SCRW-10	9.0 - 9.5	<280	<930	4800	<280	<280	<280	<280	<280	<280
	10.5 - 11.0	<550	<1800	<550	<550	<550	<550	13000	610	6,600
MM-1	8.0 - 8.5	<3	41	<3	<3	<3	<3	<3	<3	<3
	11.0 - 11.5	<3	70	<4	11	7	<4	<4	<4	<3
TAGM 4046 S	SOIL CLEANUP									-0
	ECTIVE	100	200	2.700	200	800	1.400	1.500	5.500	4.000
				2,100	200	800	1,400	1,500	5,500	1,200
Part 375 Ren	nedial Program	44.0								
	D Objectives									
Jnrestricted	ip objectives	50	50	NS	270	000				
Restricted		30	30	NO	2/0	680	1,300	700	1,000	260
	Residential	51,000	100.000	NS	19,000	400.000	Edition (AN) SH	和产生的。(15.41)		and the second
Residen	tialRestricted	100.000	100,000	NS	,	100,000	5,500	100,000	30,000	100,000
Commercial		500.000	500,000	NS NS	26,000	100,000	19,000	100,000	41,000	100,000
	Industrial	1,000,000	1,000,000	NS NS	240,000	500,000	150,000	500,000	390,000	500,000
rotection of		1,000,000	1,000,000	NO I	480,000	1,000,000	300,000	1,000,000	780,000	1,000,000
Resources	_oological	12,000	2,200	NS	NO	,,,				
	Groundwater	50	50	NS NS	NS 270	NS 680	2,000 1,300	36,000 700	NS	260

All values are reported as micrograms per kilogram (ug/kg)

<3 = Less than the reported analytical detection limit

DCA = 1,1-dichloroethane

TCA = 1,1,1-trichloroethane

PCE = tetrachloroethene

NS = No Soil Cleanup Objective

Bold Value = Exceedance of TAGM 4046 Soil Cleanup Objective

Bold and Highlighted Value = Exceedance of TAGM 4046 and Part 375 Soil Cleanup Objectives

Highlighted Value = Actual or Possible Exceedance of Part 375 Soil Cleanup Objective. Possible exceedance assumed due to elevated detection limit.

TABLE 1
2003 SITE CHARACTERIZATION STUDY SAMPLE LOCATIONS

				CURRENT	SCREEN WA	SH AREA				
SAMPLE ID	DEPTH (FEET)	METHYLENE CHLORIDE	ACETONE	CARBON DISULFIDE	DCA	TCA	PCE	TOLUENE	ETHYL- BENZENE	TOTAL
CSW-1	9.5 - 10.0	<3	40	<3	<3	<3	<3	5	<3	<6
	11.5 - 12.0	<3	58	<3	<3	<3	<3	<3	<3	<6
CSW-2	5.5 - 6.0	<3	36	<3	6	<3	<3	<3	<3	<6
	9.0 - 9.5	<3	50	<3	6	<3	<3	<3	<3	<6
CSW-3	7.0 - 7.5	11	45	<3	<3	<3	<3	<3	<3	<6
	9.5 - 10.0	<3	48	<4	<4	<4	<4	<4	<4	<8
CSW-4	10.2 - 10.6	<3	47	<3	<3	6	5	<3	<3	<6
	14.0 - 14.5	<3	61	<3	<3	<3	<3	<3	<3	<6
CSW-5	6.0 - 6.5	<3	26	<3	<3	<3	<3	<3	<3	<6
	13.0 - 13.5	<3	75	<3	<3	<3	<3	<3	<3	<6
CSW-6	8.5 - 9.0	<3	64	<3	<3	<3	<3	<3	<3	<6
	15.0 - 15.5	16	50	<3	<3	<3	<3	3	<3	<6
CSW-7	4 - 8	<3	24	<3	<3	<3	4	<3	<3	<6
	12 - 13	<3	55	<3	<3	<3	<3	<3	<3	<6
TAGM 404	6 Soil Cleanup									
Objectives		100	200	2,700	200	800	1,400	1,500	5.500	1,200
Program	-6 Remedial Soil Cleanup ectives									
Unrestricted		50	50	NS	270	680	1,300	700	1,000	260
Restricted										
Residential		51,000	100,000	NS	19,000	100,000	5,500	100,000	30,000	100,000
ResidentialRestricted		100,000	100,000	NS	26,000	100,000	19,000	100,000	41,000	100,000
Commercial		500,000	500,000	NS	240,000	500,000	150,000	500,000	390,000	500,000
Industrial		1,000,000	1,000,000	NS	480,000	1,000,000	300,000	1,000,000	780,000	1,000,000
Protection o	f Ecological									
Resources		12,000	2,200	NS	NS	NS	2,000	36,000	NS	260
Protection o	f Groundwater	50	50	NS	270	680	1,300	700	1,000	1.600

All values are reported as micrograms per kilogram (ug/kg)

<3 = Less than the reported analytical detection limit

DCA = 1,1-dichloroethane

TCA = 1,1,1-trichloroethane

PCE = tetrachloroethene

NS = No Soil Cleanup Objective

Bold Value = Exceedance of TAGM 4046 Soil Cleanup Objective

Bold and Highlighted Value = Exceedance of TAGM 4046 and Part 375 Soil Cleanup Objectives

Highlighted Value = Actual or Possible Exceedance of Part 375 Soil Cleanup Objective. Possible exceedance assumed due to elevated detection limit.

TABLE 2 HISTORIC AREAS EXCEEDING TAGM 4046 (1998 vs. 2003)

		FORM	ER MANUAL SCREE	EN WASH ARE	A		
1998 SAMPLE ID CONCENTRATION		2003 SAMPLE ID DEPTH 1	CONCENTRATION	% REDUCTION	2003 SAMPLE ID DEPTH 2	CONCENTRATION	% REDUCTION
SB-13		SCRW-07 (10.0 - 10.5)			SCRW-07 (14.5 - 15.0)		
TOTAL XYLENES	7500	TOTAL XYLENES	16	99.8%	TOTAL XYLENES	4	99.9%
TOLUENE	140000	TOLUENE	270	99.8%	TOLUENE	120	99.9%
PCE	530	PCE	8	98.5%	PCE	1.5	99.7%
SB-15		SCRW-01 (4.5 - 5.0)			SCRW-01 (14 - 15)		
TOTAL XYLENES	1850	TOTAL XYLENES	3	99.8%	TOTAL XYLENES	3	99.8%
TOLUENE	12000	TOLUENE	1.5	100.0%	TOLUENE	1.5	100.0%
PCE	57	PCE	1.5	97.4%	PCE	1.5	97.4%
MW-106		SCRW-03 (7.5 - 8.0)			SCRW-03 (10.7 - 11.2)		
TOTAL XYLENES	1390	TOTAL XYLENES	3	99.8%	TOTAL XYLENES	280	79.9%
TOLUENE	16000	TOLUENE	1.5	100.0%	TOLUENE	140	99.1%
PCE	23	PCE	1.5	93.5%	PCE	140	N/A
MW-102		SCRW-02 (9.0 - 9.5)			SCRW-02 (14.5 - 15.0)		
TOTAL XYLENES	1660	TOTAL XYLENES	280	83.1%	TOTAL XYLENES	5	99.7%
TOLUENE	11000	TOLUENE	140	98.7%	TOLUENE	8	99.9%
PCE	290	PCE	140	51.7%	PCE	1.5	99.5%

CURRENT SCREEN WASH AREA										
1998 SAMPLE ID	CONCENTRATION	2003 SAMPLE ID DEPTH 1	CONCENTRATION	% REDUCTION	2003 SAMPLE ID DEPTH 2	CONCENTRATION	% REDUCTION			
MW-107		CSW-05 (6.0 - 6.5)			CSW-05 (13.0 - 13.5)					
TOTAL XYLENES	2	TOTAL XYLENES	3	N/A	TOTAL XYLENES	3	N/A			
TOLUENE	2	TOLUENE	1.5	N/A	TOLUENE	1.5	N/A			
PCE	2	PCE	1.5	N/A	PCE	1.5	N/A			
DCA	22	DCA	1.5	93.2%	DCA	1.5	93.2%			
MW-101		CSW-07 (4 - 8)			CSW-07 (12 - 13)					
TOTAL XYLENES	1.5	TOTAL XYLENES	3	N/A	TOTAL XYLENES	3	N/A			
TOLUENE	1.5	TOLUENE	1.5	N/A	TOLUENE	1.5	N/A			
PCE	1.5	PCE	4	N/A	PCE	1.5	N/A			
DCA	1.5	DCA	1.5	N/A	DCA	1.5	N/A			

All values are reported as micrograms per kilogram (ug/kg)

DCA = 1,1-dichloroethane

TCA = 1,1,1-trichloroethane

PCE = tetrachloroethene

Red text indicates concentration is below the analytical detection limit.

Reported value is 1/2 the analytical detection limit.

N/A = % Reduction does not apply since the 1998 concentration for the selected analyte was below the analytical detection limit or the 2003 concentration was below the analytical detection limit, which is greater that the corresponding 1998 concentration