Geotechnical
Environmental
Water Resources
Ecological

October 18, 2013 Project No. 1323080

Mr. Michael Friend, P.E.
Staff Engineer III
Special Projects Branch
Bureau of Corrective Actions
Nevada Division of Environmental Protection
2030 East Flamingo Road, Suite 230
Las Vegas, Nevada 89119

Re: Titanium Metals Corporation
Henderson, Nevada Facility
NDEP Facility ID # 000537
Response to NDEP Comments Dated October 1, 2013, Regarding
Conceptual Site Model Supplemental Investigation Work Plan Submitted August 26, 2013

Dear Mr. Friend:

Titanium Metals Corporation (TIMET) is in receipt of the Department's letter dated October 1, 2013 presenting comments on the above-captioned work plan. On behalf of TIMET, GEI Consultants is pleased to provide responses to these comments (Attachment A).

If you have any questions regarding this submittal, please do not hesitate to contact the undersigned at (716) 204-7158 (email: kmcintosh@geiconsultants.com) or Mr. Richard Pfarrer of TIMET at (702) 566-4453 (email: Richard.Pfarrer@Timet.com).

Sincerely,

GEI Consultants, Inc.

Kelly R. McIntosh, Ph.D., EM-2199 (exp. 9/24/15)
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Ed Modiano – OSSM GWTS, by electronic mail
Chuck Elmendorf –Stauffer, by electronic mail
Nick Pogoncheff –Stauffer, by electronic mail
George Crouse –Syngenta, by electronic mail
Enoe Marcum – WAPA, by electronic mail

Attachment A

<u>NDEP Comment 1:</u> General comment, the referenced 2007 CSM which was not approved by NDEP and has several rounds of responses to comments and errata that were submitted after April 2007. TIMET should acknowledge or address the limitations of the Deliverable. For instance, the December 2007 RTC Deliverable acknowledges that the PCB congener data has not yet been presented and defers this to undefined future Deliverables.

TIMET Response: TIMET agrees to acknowledge the limitations of the referenced 2007 CSM.

<u>NDEP Comment 2:</u> General comment, NDEP does not have a copy of the "Self-Implementing Cleanup Work Plan for PCBs in the J-2 Landfill" dated January 2011 referenced in this Deliverable. Please provide a copy of the aforementioned work plan (electronically is acceptable).

TIMET Response: TIMET agrees. The referenced work plan (prepared by ERM) will be submitted to NDEP under separate cover.

<u>NDEP Comment 3:</u> Section 1, page 1, TIMET indicates that the investigation is limited to Parcels B, C and D. Please clarify which parcels (i.e. A, E, F, and G) were excluded and why.

<u>TIMET Response:</u> There is no additional investigation proposed for Parcel A, but its evaluation is retained within the scope of the CSM. Parcels E, F, and G are excluded from the CSM. The rationale is as follows:

- Parcel A: Parcel A (i.e., the TRECO Site) was investigated by BRC in 2005 and a conditional NFA letter was issued by NDEP on April 19, 2006. The NFA letter noted that soils below 10 feet were not investigated and that TIMET retains responsibility to address groundwater impacts. GEI has reviewed the available data and concludes the existing monitoring well network is sufficient for assessing potential groundwater impacts from Parcel A.
- Parcel E: The scope of the CSM as proposed by TIMET will be on the TIMET Plant Site. Parcel E is located on NERT property and is not contiguous with the TIMET Plant Site. It is TIMET's intent to address this property as a standalone effort as any environmental impacts at Parcel E are likely independent of, and unrelated to, conditions at the TIMET Plant Site. TIMET is open to further discussion with NDEP concerning the disposition of Parcel E.
- Parcel F: Parcel F is located on NERT property and is not contiguous with the TIMET Plant Site and does not fall within the proposed scope of the Plant Site CSM. By letter dated November 7, 2006, NDEP conditionally approved no further action for Parcel F. TIMET does not propose any additional investigation of Parcel F at this time.
- Parcel G: Parcel G is located on NERT property and is not contiguous with the TIMET Plant Site and does not fall within the proposed scope of the Plant Site CSM. TIMET does not propose any additional investigation of Parcel G at this time.

<u>NDEP Comment 4:</u> Section 1.3 Supplemental Investigation Objectives, page 2. This discussion does not define who the exposed population is, e.g., fugitive dust to an on-site worker or an off-site receptor. This section should be accompanied by a complete CSM diagram (EPA, 1988 and 1996).

TIMET Response: TIMET agrees.

<u>NDEP Comment 5:</u> Section 1.3 Supplemental Investigation Objectives, page 2, last sentence of the section. Please explain how "all relevant data" will be determined.

TIMET Response: Relevant data includes validated and usable analytical results previously generated from sample collection targeted to PSAs being assessed in the CSM.

<u>NDEP Comment 6:</u> Section 1.4, page 2, TIMET indicates "This Supplemental Investigation Work Plan focuses on key PSAs for which additional sampling data would be useful for addressing specific exposure pathways. It is not intended to limit further consideration of PSAs not targeted for additional investigation herein. All known PSA's will be addressed in the revised CSM report. There may be additional data gaps identified during this process." NDEP agrees with this statement and notes that the lack of detail and justification within the Deliverable limit the NDEP's ability to fully review the Deliverable. NDEP also notes that TIMET should complete a data usability evaluation prior to the development of the CSM. Additional specific comments are provided below. No response is needed for this comment.

<u>TIMET Response:</u> Comment noted.

<u>NDEP Comment 7:</u> Section 1.4 Supplemental Investigation Scope, page 2, 1st paragraph of the section. There is no explanation as to how data gaps were determined. The NDEP provided the BMI Companies "Revised Data Usability Guidance" (NDEP, 2010) which includes the procedure for identifying potential data gaps. This is a global comment for the subject Deliverable.

<u>TIMET Response:</u> During preparation of the CSM, TIMET will follow the cited NDEP guidance for determining data usability and potential data gaps.

<u>NDEP Comment 8:</u> Section 1.4, page 2, TIMET indicates that the investigation does not include investigation of current waste generation and management activities. Please provide additional clarification as to why existing practices do not require assessment as it is NDEP's understanding that recent and historic waste management practices are the reason for this work plan.

<u>TIMET Response:</u> TIMET is currently conducting a study of its current waste generation and waste management activities at the facility. The results will be reviewed and considered during preparation of the CSM. If new PSAs or potential environmental impacts are indicated, these will be identified in the CSM as data gaps as appropriate.

<u>NDEP Comment 9:</u> Section 1.4, page 3, please list the areas of the site which have been granted NFAs and explain why no assessment is applicable to these areas. For example, if the NFA pre-dates the NDEP's knowledge of the site-wide PCB issue these areas should be re-investigated.

<u>TIMET Response:</u> TIMET agrees to list the NFAs and rationale for not including additional investigations. NDEP has been informed of TIMET's continuing evaluation of the presence of PCBs in its manufacturing process, however, there is no "site-wide PCB issue" known at this time. TIMET is undergoing a thorough review of potential PCB generation in the $MgCl_2$ recovery process under the direction and oversight of EPA and the CSM has included a rather broad-based site-wide sampling program for PCB congeners focused on the major PSAs and drainageways. In most cases the sampling is being performed without any evidence the areas have been impacted by PCBs. It is noted that the results of the PCB study (being performed by ERM) could lead to additional environmental sampling if releases are identified as potentially impacting areas not investigated for the CSM.

<u>NDEP Comment 10:</u> Section 2.1, page 4, it is suggested that the Deliverable have a summary which shows the original LOU area numbers versus the PSA numbers and demonstrates how each is or is not being addressed by the current Deliverable.

<u>TIMET Response:</u> TIMET agrees.

<u>NDEP Comment 11:</u> Section 2.1 PSAs Identified for Additional Investigation, page 5, last paragraph on page. Please explain how it was determined that the listed areas were not "thoroughly investigated."

TIMET Response: The term “thoroughly investigated” will be dropped.

<u>NDEP Comment 12:</u> Section 2.2.1, page 6, NDEP provides the following comments:

- **a. Please provide the basis for the depths of sampling. This is an issue that affects a number of sections of the Deliverable and the comment will not be repeated.**
- **b. Please note that a surface sample has been defined as 0-6” bgs throughout the BMI Complex and Common Areas. Please explain the basis for the deviation from the approved SOP.**
- **c. Please provide a basis for the locations of the samples. This is an issue that affects a number of sections of the Deliverable and the comment will not be repeated.**
- **d. Please provide a discussion of the PCB sources on the site as well as a description of all waste management practices through time for each of the sources. (Note: This can probably be found in the work plan for PCBs that TIMET has submitted to the EPA)**
- **e. Northern Storage Area, page 6, last paragraph of the Section. Surface samples were identified in the Section as the top 12 inches of soil. Please clarify the representativeness of an asbestos sample collected from soil surface to 12 inches below surface in terms of the CSM.**

<u>TIMET Responses:</u>

- a. The basis for the depths of sampling is to collect samples representative of surficial soils (as noted below, this depth will be revised to 0-6” bgs in accordance with the approved SOP) and subsurface soil. The subsurface soil depths to be sampled are limited to the upper 10 to 15 feet of soil. Below this depth, soil conditions are a concern primarily as a source of groundwater contamination. Groundwater impacts are evaluated using the monitoring well network at the site (as augmented per this work plan).
- b. TIMET will collect surface soil samples from 0-6” bgs in accordance with the referenced SOP.
- c. TIMET agrees. The basis for sample locations will be included in the revised work plan.
- d. The requested information will be included in the CSM report.
- e. TIMET will collect surface soil samples from 0-6” bgs in accordance with the referenced SOP and Technical Guidance for the Calculation of Asbestos Related Risk in Soils for the Basic Management Incorporated (BMI) Complex and Common Areas.

<u>NDEP Comment 13:</u> Section 2.2.2.1, page 7, if the analytical results are available, please include them and discuss if this is helping to guide the current sampling proposal.

<u>TIMET Response:</u> These results will be provided to NDEP under separate cover. They were not used to guide the current sampling proposal.

<u>NDEP Comment 14:</u> Sections 2.2.2.1 HP-1 and 2.2.2.2 SW-1, page 7, please clarify whether the samples were collected in accordance with an approved sampling and analysis plan.

<u>TIMET Response:</u> The HP-1 sampling was an opportunistic sampling event to coincide with liner removal during the short (1 day) timeframe during which sub-liner soil sample collection and direct observation was possible. The liner removal itself was an unplanned event—the liner was damaged during sediment removal necessitating replacement. The work was not conducted under an approved sampling and analysis plan. However, the methods and analyses performed were discussed with NDEP in advance, and the sampling, analytical, and validation protocols were in accordance with approved SOPs. The SW-1 sampling was also not conducted under an approved sampling and analysis plan. However, NDEP was notified in advance that the sampling would be performed, and the sample collection (except for compositing as noted below), analytical methods, and validation protocols were in accordance with approved SOPs. It is TIMET's intent that these results will be useable for the CSM.

<u>NDEP Comment 15:</u> Section 2.2.2.2, page 7, please note that NDEP has previously not allowed the use of composite samples as it is very difficult to combine these results with discrete sample results for future health risk assessment evaluations. Please explain the basis for the use of composite samples.

<u>TIMET Response:</u> The material in SW-1 was sampled for preliminary characterization using a "waste characterization approach". To the extent risk analysis is needed specifically for SW-1, GEI would argue composite data is appropriate. SW-1 material will not be considered "soil" and would not be used in any statistical analysis of soil samples which could be performed as part of future health risk evaluations.

<u>NDEP Comment 16:</u> Section 2.2.2.3, page 7, please note that it is NDEP's understanding that the CSD ponds were only partially removed. The materials were used to dilute the materials from Francy's Mountain for disposal at the WCS Facility in West Texas. Please clarify if this affects the proposed sampling.

<u>TIMET Response:</u> The partial removal did not influence the proposed sampling.

<u>NDEP Comment 17:</u> Section 2.2.2.3 CSD Ponds, page 7, last paragraph on page. Soil samples from a maximum of ten to 15 feet below grade are not sufficient to evaluate the soil leaching to groundwater pathway.

<u>TIMET Response:</u> Soil leaching from deeper soils to groundwater is monitored by site monitoring well network and will be controlled by the groundwater extraction system. The effect of lingering sources of contamination in the unsaturated zone will be monitored using the site groundwater monitoring well network in concert with long term groundwater chemistry trend analysis in extracted groundwater (extraction system monitoring).

<u>NDEP Comment 18:</u> Section 2.2.4, page 8, please note that it is NDEP's understanding that the waste materials at Francy's Mountain were partially removed. Removal was completed to land surface, however, no samples were used to guide the stoppage of excavation. It is not clear to the NDEP that any evidence has been presented to substantiate that the complete removal of Francy's Mountain was completed. In addition, based upon the composition of Francy's Mountain, NDEP disagrees with limiting the radionuclide characterization to two locations. All locations should be analyzed for radionuclides.

<u>TIMET Response:</u> The text of the deliverable will state that removal was completed to the pre-existing grade and no endpoint samples were collected. All four surface soil locations will be analyzed for radionuclides.

NDEP Comment 19: Section 2.2.7, page 9, please indicate the size of this "large area" and how this relates to the proposal of four surface soil samples and one asbestos sample location.

TIMET Response: The "Boneyard" encompasses approximately 3.5 acres. There are no known waste disposal activities or chemical releases impacting this area, hence the "screening level" sampling approach.

NDEP Comment 20: Section 2.2.8, page 9, please provide data and or citation to validate the statement that the materials placed in the J2 Landfill are "inert". In addition, please discuss any characterization of materials beneath the liner.

TIMET Response: The more correct term for the materials placed in the J2 Landfill is "non-putrescible". The text of the deliverable will be revised accordingly. Characterization of materials beneath the liner is not planned.

NDEP Comment 21: Section 2.2.11, page 10, 2nd paragraph, please revise this paragraph to indicate that the wells will be screened in the First Water-Bearing Zone (WBZ) not the Qal per NDEP guidance.

TIMET Response: TIMET agrees.

NDEP Comment 22: Section 3, general comment, this section reiterates portions of SOPs approved by NDEP previously. The purpose of approving these SOPs previously was to streamline the SAP process and reduce costs. SOPs should only be discussed if exceptions to the pre-approved SOPs are requested. NDEP has not reviewed this section in detail, please clarify if any exceptions to the existing SOPs are requested.

TIMET Response: TIMET intends to follow the approved SOPs for soil and groundwater sample collection. For the monitoring wells, TIMET intends to install 2-inch diameter PVC wells screened and installed in accordance with NDEP Technical Publication WTS-4 (Revised July 2012).

NDEP Comment 23: Section 3.1.1, page 11, NDEP does not concur with deviation from the NDEP-approved SOP for asbestos soil samples, no basis has been provided to support this request. Please revise this Section accordingly.

TIMET Response: TIMET agrees. The NDEP-approved SOP will be adhered to.

NDEP Comment 24: Section 3.1.2, page 11, similar to above, no basis has been provided for the 15' bgs depth of samples. Please clarify.

TIMET Response: The subsurface soil depths to be sampled are limited to the upper 10 to 15 feet of soil. Below this depth, soil conditions are a concern primarily as a source of groundwater contamination. Groundwater impacts are evaluated using the monitoring well network at the site (as augmented per this work plan) in concert with long term groundwater chemistry trend analysis in extracted groundwater (extraction system monitoring).

NDEP Comment 25: Section 3.2.2 Groundwater Sampling, page 11, last paragraph on page, please add ORP to the list of field parameters.

TIMET Response: TIMET agrees.

NDEP Comment 26: Section 3.3, page 12, NDEP's guidance on asbestos should be referenced, it is not clear that TIMET is complying with NDEP guidance.

TIMET Response: TIMET agrees. TIMET will include this reference and will comply with the NDEP guidance.

NDEP Comment 27: Section 3.5, page 12, soil cuttings should not be returned to the borehole. Please review and reference Nevada Division of Water Resources regulations on this matter.

TIMET Response: TIMET agrees. Soil cuttings will be containerized for proper disposal.

NDEP Comment 28: Section 3.5, page 12, please reference the NDEP approval for the contained-in determination for disposal of IDW in to the WCF.

TIMET Response: TIMET agrees.

NDEP Comment 29: Table 1, NDEP provides the following comments:

a. Please add a column which references the PSA number and the LOU numbers. Please list all PSA and LOU numbers so that it can be shown which areas are proposed to not be assessed at this time.

b. As discussed above, no information has been presented to substantiate the analyses selected for each sampling interval and location. Please clarify.

TIMET Response:

a) TIMET agrees.

b) Rationale for analytical program will be included in the revised deliverable.

NDEP Comment 30: Table 2, NDEP provides the following comments:

a) Please explain the basis for this table and how it relates to the Site-Related Chemicals (SRC) list.

b) Regarding asbestos, it would be more appropriate to reference the most current NDEP guidance rather than Berman and Kolk.

TIMET Response:

a) Major deviations from the SRC List are summarized as follows:
   - PCB analyses have been expanded to include all congeners.
   - The anion list has been reduced to the major anions detected in soil and groundwater at the site (chloride, nitrate and sulfate). Table 2 will be eliminated from the work plan. Tables B-1 and B-2 have been revised to include only the analytes being analyzed for the proposed investigations (these formerly contained the entire SRC List in the prior submittal).

b) TIMET agrees.

NDEP Comment 31: Figure 2, it is requested that PSA and LOU numbers and features be shown on this Figure.

TIMET Response: TIMET agrees.

<u>NDEP Comment 32:</u> Appendix B, Table B-1, NDEP provides the following comments:

a. **Please clarify if the project laboratory has changed as there are several missing reporting limits. If the laboratory has changed a revised project QAPP is needed with the supporting documentation.**
b. **Please clarify when or how the missing reporting limits will be resolved before sampling is initiated.**
c. **Please replace the defunct USEPA Tap Water PRGs with the current USEPA Regional Screening Levels and add the NDEP BCLs.**
d. **Note "d", NDEP did not see any project reporting limits that were highlighted other than those that were "TBD". Please clarify this note or the shading for the project reporting limits column.**

<u>TIMET Responses:</u>
Tables B-1 and B-2 (attached) have been changed to accurately reflect the analytical program summarized on Tables 1 and 2 of the work plan. Tables B-1 and B-2 have been retitled "Proposed Analytical Lists for Conceptual Site Model Supplemental Investigations". Specific responses:

a) The project laboratory was recently changed from ALS Global to TestAmerica, Inc. The project QAPP will be updated to incorporate TestAmerica, Inc. laboratory reporting limits and method detection limits, and standard operating procedures.
b) Any missing reporting limits will be updated in the revised QAPP
c) Screening levels have been removed from the Tables B-1 and B-2 but will be included (with NDEP BCLs) in the revised QAPP
d) The revised QAPP will clearly define any notes referenced in the document.

TABLE B-1
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-SOIL SAMPLES

Analyte	*Method*	*Units*	*RL*
Radionuclides:			
Gross Alpha	900.0	pCi/g	10
Gross Beta	900.0	pCi/g	10
Radium-226	903	pCi/g	1.0
Radium-228	904	pCi/g	1.0
Actinium 228	901.1_Ra	pCi/g	Relative to Cs-137
Bismuth-210M	901.1_Ra	pCi/g	Relative to Cs-137
Bismuth-212	901.1_Ra	pCi/g	Relative to Cs-137
Bismuth-214	901.1_Ra	pCi/g	Relative to Cs-137
Cesium-134	901.1_Ra	pCi/g	Relative to Cs-137
Cesium-137	901.1_Ra	pCi/g	0.20
Cobalt-57	901.1_Ra	pCi/g	Relative to Cs-137
Cobalt-60	901.1_Ra	pCi/g	Relative to Cs-137
Lead-212	901.1_Ra	pCi/g	Relative to Cs-137
Lead-214	901.1_Ra	pCi/g	Relative to Cs-137
Potassium-40	901.1_Ra	pCi/g	Relative to Cs-137
Protactinium-231	901.1_Ra	pCi/g	Relative to Cs-137
Protactinium-234	901.1_Ra	pCi/g	Relative to Cs-137
Radium-224	901.1_Ra	pCi/g	Relative to Cs-137
Thallium-208	901.1_Ra	pCi/g	Relative to Cs-137
Thorium 228	901.1_Ra	pCi/g	Relative to Cs-137
Thorium-227	901.1_Ra	pCi/g	Relative to Cs-137
Thorium-228	901.1_Ra	pCi/g	Relative to Cs-137
Thorium-230	901.1_Ra	pCi/g	Relative to Cs-137
Thorium-232	901.1_Ra	pCi/g	Relative to Cs-137
Thorium-234	901.1_Ra	pCi/g	Relative to Cs-137
Uranium-238	Alpha Spectometry A01R_U	pCi/g	1.0
Thorium-230	Alpha Spectrometry A01R_Th	pCi/g	1.0
Uranium-233/234	Alpha Spectrometry A01R_U	pCi/g	1.0
Uranium-235/236	Alpha Spectrometry A01R_U	pCi/g	1.0
Metals:			
Aluminum	6010C	mg/Kg	20
Antimony	6010C	mg/Kg	1.0
Barium	6010C	mg/Kg	5.0
Beryllium	6010C	mg/Kg	0.50
Cadmium	6010C	mg/Kg	0.50
Calcium	6010C	mg/Kg	250
Chromium	6010C	mg/Kg	1.0
Cobalt	6010C	mg/Kg	5.0
Copper	6010C	mg/Kg	2.5
Iron	6010C	mg/Kg	10
Lead	6010C	mg/Kg	1.0
Magnesium	6010C	mg/Kg	100
Manganese	6010C	mg/Kg	1.0
Nickel	6010C	mg/Kg	4.0
Potassium	6010C	mg/Kg	500
Selenium	6010C	mg/Kg	1.5
Silver	6010C	mg/Kg	1.0
Sodium	6010C	mg/Kg	100
Titanium	6010C	mg/Kg	2.0
Vanadium	6010C	mg/Kg	5.0
Zinc	6010C	mg/Kg	5.0
Arsenic	6020A	mg/Kg	1.0

TABLE B-1
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-SOIL SAMPLES

Analyte	*Method*	*Units*	*RL*
Metals (continued):			
Niobium	6020A	mg/Kg	2.5
Thallium	6020A	mg/Kg	0.50
Uranuim	6020A	mg/Kg	0.0050
Mercury	7471A	mg/Kg	0.020
Volatile Organic Chemicals:			
Acetone	8260C	ug/Kg	20
Acetonitrile	8260C	ug/Kg	50
Benzene	8260C	ug/Kg	5.0
Bromobenzene	8260C	ug/Kg	5.0
Chlorobromomethane	8260C	ug/Kg	5.0
Bromodichloromethane	8260C	ug/Kg	5.0
Bromoform	8260C	ug/Kg	5.0
Bromomethane	8260C	ug/Kg	10
2-Butanone (MEK)	8260C	ug/Kg	20
n-Butylbenzene	8260C	ug/Kg	5.0
sec-Butylbenzene	8260C	ug/Kg	5.0
tert-Butylbenzene	8260C	ug/Kg	5.0
Carbon disulfide	8260C	ug/Kg	5.0
Carbon tetrachloride	8260C	ug/Kg	5.0
Chlorobenzene	8260C	ug/Kg	5.0
Dibromochloromethane	8260C	ug/Kg	5.0
Chloroethane	8260C	ug/Kg	10
Chloroform	8260C	ug/Kg	5.0
Chloromethane	8260C	ug/Kg	10
2-Chlorotoluene	8260C	ug/Kg	5.0
4-Chlorotoluene	8260C	ug/Kg	5.0
Dibromomethane	8260C	ug/Kg	5.0
1,2-Dichlorobenzene	8260C	ug/Kg	5.0
1,3-Dichlorobenzene	8260C	ug/Kg	5.0
1,4-Dichlorobenzene	8260C	ug/Kg	5.0
Dichlorodifluoromethane	8260C	ug/Kg	10
1,1-Dichloroethane	8260C	ug/Kg	5.0
1,2-Dichloroethane	8260C	ug/Kg	5.0
cis-1,2-Dichloroethene	8260C	ug/Kg	5.0
trans-1,2-Dichloroethene	8260C	ug/Kg	5.0
1,1-Dichloroethene	8260C	ug/Kg	5.0
1,2-Dichloropropane	8260C	ug/Kg	5.0
1,3-Dichloropropane	8260C	ug/Kg	5.0
2,2-Dichloropropane	8260C	ug/Kg	5.0
cis-1,3-Dichloropropene	8260C	ug/Kg	5.0
trans-1,3-Dichloropropene	8260C	ug/Kg	5.0
1,1-Dichloropropene	8260C	ug/Kg	5.0
Ethylbenzene	8260C	ug/Kg	5.0
2-Hexanone	8260C	ug/Kg	20
Methyl iodide	8260C	ug/Kg	5.0
Isopropylbenzene	8260C	ug/Kg	5.0
Cymene	8260C	ug/Kg	5.0
Methylene Chloride	8260C	ug/Kg	5.0
4-Methyl-2-pentanone (MIBK)	8260C	ug/Kg	20
Methyl tert-butyl ether	8260C	ug/Kg	5.0
Naphthalene	8260C	ug/Kg	5.0
N-Propylbenzene	8260C	ug/Kg	5.0

TABLE B-1
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-SOIL SAMPLES

Analyte	*Method*	*Units*	*RL*
Volatile Organic Chemicals (continued):			
Styrene	8260C	ug/Kg	5.0
1,1,1,2-Tetrachloroethane	8260C	ug/Kg	5.0
1,1,2,2-Tetrachloroethane	8260C	ug/Kg	5.0
Tetrachloroethene	8260C	ug/Kg	5.0
Toluene	8260C	ug/Kg	5.0
1,2,3-Trichlorobenzene	8260C	ug/Kg	5.0
1,2,4-Trichlorobenzene	8260C	ug/Kg	5.0
1,1,1-Trichloroethane	8260C	ug/Kg	5.0
1,1,2-Trichloroethane	8260C	ug/Kg	5.0
Trichloroethene	8260C	ug/Kg	5.0
Trichlorofluoromethane	8260C	ug/Kg	5.0
1,2,3-Trichloropropane	8260C	ug/Kg	5.0
1,2,4-Trimethylbenzene	8260C	ug/Kg	5.0
1,3,5-Trimethylbenzene	8260C	ug/Kg	5.0
Vinyl acetate	8260C	ug/Kg	5.0
Vinyl chloride	8260C	ug/Kg	5.0
m-Xylene & p-Xylene	8260C	ug/Kg	5.0
o-Xylene	8260C	ug/Kg	5.0
Xylenes, Total	8260C	ug/Kg	10
Ethanol	8260C	ug/Kg	250
Semi-Volatile Organic Chemicals:			
1,4-Dioxane	8270C	ug/Kg	660
2-Fluorophenol	8270C	ug/Kg	33
Phenol	8270C	ug/Kg	330
Aniline	8270C	ug/Kg	330
2-Chlorophenol	8270C	ug/Kg	330
Benzyl alcohol	8270C	ug/Kg	330
4-Methylphenol	8270C	ug/Kg	330
3-Methylphenol	8270C	ug/Kg	330
Acetophenone	8270C	ug/Kg	330
N-Nitrosodi-n-propylamine	8270C	ug/Kg	330
Hexachloroethane	8270C	ug/Kg	330
Nitrobenzene	8270C	ug/Kg	330
Isophorone	8270C	ug/Kg	330
2,4-Dimethylphenol	8270C	ug/Kg	330
2-Nitrophenol	8270C	ug/Kg	330
Benzoic acid	8270C	ug/Kg	1600
Bis(2-chloroethoxy)methane	8270C	ug/Kg	330
2,4-Dichlorophenol	8270C	ug/Kg	330
Naphthalene	8270C	ug/Kg	330
4-Chloroaniline	8270C	ug/Kg	330
Hexachlorobutadiene	8270C	ug/Kg	330
4-Chloro-3-methylphenol	8270C	ug/Kg	330
2-Methylnaphthalene	8270C	ug/Kg	330
1,2,4,5-Tetrachlorobenzene	8270C	ug/Kg	330
Hexachlorocyclopentadiene	8270C	ug/Kg	1600
2,4,6-Trichlorophenol	8270C	ug/Kg	330
2,4,5-Trichlorophenol	8270C	ug/Kg	330
2-Fluorobiphenyl	8270C	ug/Kg	33
2-Chloronaphthalene	8270C	ug/Kg	330
2-Nitroaniline	8270C	ug/Kg	1600
Dimethyl phthalate	8270C	ug/Kg	330

TABLE B-1
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-SOIL SAMPLES

Analyte	*Method*	*Units*	*RL*
Semi-Volatile Organic Chemicals (continued):			
2,6-Dinitrotoluene	8270C	ug/Kg	330
Acenaphthylene	8270C	ug/Kg	330
3-Nitroaniline	8270C	ug/Kg	1600
Acenaphthene	8270C	ug/Kg	330
2,4-Dinitrophenol	8270C	ug/Kg	1600
4-Nitrophenol	8270C	ug/Kg	1600
Dibenzofuran	8270C	ug/Kg	330
2,4-Dinitrotoluene	8270C	ug/Kg	330
Pentachlorobenzene	8270C	ug/Kg	330
Diethyl phthalate	8270C	ug/Kg	660
4-Chlorophenyl phenyl ether	8270C	ug/Kg	330
Fluorene	8270C	ug/Kg	330
4-Nitroaniline	8270C	ug/Kg	1600
n-Nitrosodiphenylamine(as diphenylamine)	8270C	ug/Kg	330
1,2-Diphenyl-hydrazine	8270C	ug/Kg	330
Azobenzene	8270C	ug/Kg	330
2,4,6-Tribromophenol	8270C	ug/Kg	330
4-Bromophenyl phenyl ether	8270C	ug/Kg	330
Hexachlorobenzene	8270C	ug/Kg	330
Pentachlorophenol	8270C	ug/Kg	1600
Phenanthrene	8270C	ug/Kg	330
Anthracene	8270C	ug/Kg	330
Carbazole	8270C	ug/Kg	330
Di-n-butyl phthalate	8270C	ug/Kg	330
Fluoranthene	8270C	ug/Kg	330
Pyrene	8270C	ug/Kg	330
Butyl benzyl phthalate	8270C	ug/Kg	330
Bis(2-ethylhexyl) phthalate	8270C	ug/Kg	330
3,3'-Dichlorobenzidine	8270C	ug/Kg	660
Benzo[a]anthracene	8270C	ug/Kg	330
Chrysene	8270C	ug/Kg	330
Di-n-octyl phthalate	8270C	ug/Kg	330
Benzo[b]fluoranthene	8270C	ug/Kg	330
Benzo[k]fluoranthene	8270C	ug/Kg	330
Benzo[a]pyrene	8270C	ug/Kg	330
Dibenz(a,h)anthracene	8270C	ug/Kg	330
Indeno[1,2,3-cd]pyrene	8270C	ug/Kg	330
Benzo[g,h,i]perylene	8270C	ug/Kg	330
Bis(2-chloroethyl)ether	8270C	ug/Kg	330
2,2'-oxybis[1-chloropropane]	8270C	ug/Kg	330
Phthalic acid	8270C	ug/Kg	2500
Octachlorostyrene	8270C	ug/Kg	330
4-Chlorophenyl methyl sulfide	8270C	ug/Kg	330
4-chlorobenzenethiol	8270C	ug/Kg	330
p-chlorophenyl sulfone	8270C	ug/Kg	330
n-hydroxymethylphthalimide	8270C	ug/Kg	330
Diphenylsulfone	8270C	ug/Kg	330
Phenyl sulfide	8270C	ug/Kg	330
Phenyl disulfide	8270C	ug/Kg	330
Bis(4-chlorophenyl)disulfide	8270C	ug/Kg	330
4,4'-Dichlorobenzil (as 2,2'-Dichlorobenzil)	8270C	ug/Kg	330

TABLE B-1
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-SOIL SAMPLES

Analyte	***Method***	***Units***	***RL***
Anions and Alkalinity:			
Chloride	300.0_28D	mg/Kg	2
Nitrate As N	300_48HR	mg/Kg	0.2
Sulfate	300.0_28D	mg/Kg	5
PCB Congeners:			
PCB-1	1668C	pg/g	20.0
PCB-2	1668C	pg/g	20.0
PCB-3	1668C	pg/g	20.0
PCB-4	1668C	pg/g	20.0
PCB-5	1668C	pg/g	20.0
PCB-6	1668C	pg/g	20.0
PCB-7	1668C	pg/g	20.0
PCB-8	1668C	pg/g	20.0
PCB-9	1668C	pg/g	20.0
PCB-10	1668C	pg/g	20.0
PCB-11	1668C	pg/g	20.0
PCB-12/13	1668C	pg/g	40.0
PCB-14	1668C	pg/g	20.0
PCB-15	1668C	pg/g	20.0
PCB-16	1668C	pg/g	20.0
PCB-17	1668C	pg/g	20.0
PCB-18/30	1668C	pg/g	40.0
PCB-19	1668C	pg/g	20.0
PCB-20/28	1668C	pg/g	40.0
PCB-21/33	1668C	pg/g	40.0
PCB-22	1668C	pg/g	20.0
PCB-23	1668C	pg/g	20.0
PCB-24	1668C	pg/g	20.0
PCB-25	1668C	pg/g	20.0
PCB-26/29	1668C	pg/g	40.0
PCB-27	1668C	pg/g	20.0
PCB-31	1668C	pg/g	20.0
PCB-32	1668C	pg/g	20.0
PCB-34	1668C	pg/g	20.0
PCB-35	1668C	pg/g	20.0
PCB-36	1668C	pg/g	20.0
PCB-37	1668C	pg/g	20.0
PCB-38	1668C	pg/g	20.0
PCB-39	1668C	pg/g	20.0
PCB-40/71	1668C	pg/g	40.0
PCB-41	1668C	pg/g	20.0
PCB-42	1668C	pg/g	20.0
PCB-43	1668C	pg/g	20.0
PCB-44/47/65	1668C	pg/g	60.0
PCB-45	1668C	pg/g	20.0
PCB-46	1668C	pg/g	20.0
PCB-48	1668C	pg/g	20.0
PCB-49/69	1668C	pg/g	40.0
PCB-50/53	1668C	pg/g	40.0
PCB-51	1668C	pg/g	20.0
PCB-52	1668C	pg/g	20.0
PCB-54	1668C	pg/g	20.0

TABLE B-1
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-SOIL SAMPLES

Analyte	*Method*	*Units*	*RL*
PCB Congeners (Continued):			
PCB-55	1668C	pg/g	20.0
PCB-56	1668C	pg/g	20.0
PCB-57	1668C	pg/g	20.0
PCB-58	1668C	pg/g	20.0
PCB-59/62/75	1668C	pg/g	60.0
PCB-60	1668C	pg/g	20.0
PCB-61/70/74/76	1668C	pg/g	80.0
PCB-63	1668C	pg/g	20.0
PCB-64	1668C	pg/g	20.0
PCB-66	1668C	pg/g	20.0
PCB-67	1668C	pg/g	20.0
PCB-68	1668C	pg/g	20.0
PCB-72	1668C	pg/g	20.0
PCB-73	1668C	pg/g	20.0
PCB-77	1668C	pg/g	2.00
PCB-78	1668C	pg/g	20.0
PCB-79	1668C	pg/g	20.0
PCB-80	1668C	pg/g	20.0
PCB-81	1668C	pg/g	2.00
PCB-82	1668C	pg/g	20.0
PCB-83	1668C	pg/g	20.0
PCB-84	1668C	pg/g	20.0
PCB-85/116/117	1668C	pg/g	60.0
PCB-86/87/97/108/119/125	1668C	pg/g	120
PCB-88/91	1668C	pg/g	40.0
PCB-89	1668C	pg/g	20.0
PCB-90/101/113	1668C	pg/g	60.0
PCB-92	1668C	pg/g	20.0
PCB-93/100	1668C	pg/g	40.0
PCB-107/124	1668C	pg/g	40.0
PCB-94	1668C	pg/g	20.0
PCB-95	1668C	pg/g	20.0
PCB-96	1668C	pg/g	20.0
PCB-98/102	1668C	pg/g	40.0
PCB-99	1668C	pg/g	20.0
PCB-103	1668C	pg/g	20.0
PCB-104	1668C	pg/g	20.0
PCB-105	1668C	pg/g	2.00
PCB-106	1668C	pg/g	20.0
PCB-110/115	1668C	pg/g	40.0
PCB-109	1668C	pg/g	20.0
PCB-111	1668C	pg/g	20.0
PCB-112	1668C	pg/g	20.0
PCB-114	1668C	pg/g	2.00
PCB-115	1668C	pg/g	40.0
PCB-118	1668C	pg/g	2.00
PCB-120	1668C	pg/g	20.0
PCB-121	1668C	pg/g	20.0
PCB-122	1668C	pg/g	20.0
PCB-123	1668C	pg/g	2.00
PCB-126	1668C	pg/g	2.00
PCB-127	1668C	pg/g	20.0

TABLE B-1
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-SOIL SAMPLES

Analyte	*Method*	*Units*	*RL*
PCB Congeners (Continued):			
PCB-128/166	1668C	pg/g	40.0
PCB-129/138/163	1668C	pg/g	60.0
PCB-130	1668C	pg/g	20.0
PCB-131	1668C	pg/g	20.0
PCB-132	1668C	pg/g	20.0
PCB-133	1668C	pg/g	20.0
PCB-134/143	1668C	pg/g	40.0
PCB-135/151	1668C	pg/g	40.0
PCB-136	1668C	pg/g	20.0
PCB-137	1668C	pg/g	20.0
PCB-139/140	1668C	pg/g	40.0
PCB-141	1668C	pg/g	20.0
PCB-142	1668C	pg/g	20.0
PCB-144	1668C	pg/g	20.0
PCB-145	1668C	pg/g	20.0
PCB-146	1668C	pg/g	20.0
PCB-147/149	1668C	pg/g	40.0
PCB-148	1668C	pg/g	20.0
PCB-150	1668C	pg/g	20.0
PCB-152	1668C	pg/g	20.0
PCB-153/168	1668C	pg/g	40.0
PCB-154	1668C	pg/g	20.0
PCB-155	1668C	pg/g	20.0
PCB-156/157	1668C	pg/g	4.00
PCB-158	1668C	pg/g	20.0
PCB-159	1668C	pg/g	20.0
PCB-160	1668C	pg/g	20.0
PCB-161	1668C	pg/g	20.0
PCB-162	1668C	pg/g	20.0
PCB-164	1668C	pg/g	20.0
PCB-165	1668C	pg/g	20.0
PCB-167	1668C	pg/g	2.00
PCB-169	1668C	pg/g	2.00
PCB-170	1668C	pg/g	20.0
PCB-171/173	1668C	pg/g	40.0
PCB-172	1668C	pg/g	20.0
PCB-174	1668C	pg/g	20.0
PCB-175	1668C	pg/g	20.0
PCB-176	1668C	pg/g	20.0
PCB-177	1668C	pg/g	20.0
PCB-178	1668C	pg/g	20.0
PCB-179	1668C	pg/g	20.0
PCB-180/193	1668C	pg/g	40.0
PCB-181	1668C	pg/g	20.0
PCB-182	1668C	pg/g	20.0
PCB-183	1668C	pg/g	20.0
PCB-184	1668C	pg/g	20.0
PCB-185	1668C	pg/g	20.0
PCB-186	1668C	pg/g	20.0
PCB-187	1668C	pg/g	20.0
PCB-188	1668C	pg/g	20.0
PCB-189	1668C	pg/g	2.00

TABLE B-1
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-SOIL SAMPLES

Analyte	*Method*	*Units*	*RL*
PCB Congeners (Continued):			
PCB-190	1668C	pg/g	20.0
PCB-191	1668C	pg/g	20.0
PCB-192	1668C	pg/g	20.0
PCB-194	1668C	pg/g	20.0
PCB-195	1668C	pg/g	20.0
PCB-196	1668C	pg/g	20.0
PCB-197	1668C	pg/g	20.0
PCB-198/199	1668C	pg/g	40.0
PCB-200	1668C	pg/g	20.0
PCB-201	1668C	pg/g	20.0
PCB-202	1668C	pg/g	20.0
PCB-203	1668C	pg/g	20.0
PCB-204	1668C	pg/g	20.0
PCB-205	1668C	pg/g	20.0
PCB-206	1668C	pg/g	20.0
PCB-207	1668C	pg/g	20.0
PCB-208	1668C	pg/g	20.0
PCB-209	1668C	pg/g	20.0
Total DiCB	1668C	pg/g	20.0
Total HeptaCB	1668C	pg/g	20.0
Total HexaCB	1668C	pg/g	20.0
Total MonoCB	1668C	pg/g	20.0
Total NonaCB	1668C	pg/g	20.0
Total OctaCB	1668C	pg/g	20.0
Total PCBs	1668C	pg/g	20.0
Total PentaCB	1668C	pg/g	20.0
Total TEQ	1668C	pg/g	20.0
Total TetraCB	1668C	pg/g	20.0
Total TriCB	1668C	pg/g	20.0
Dioxins and Furans:			
2,3,7,8-TCDD	8290A	pg/g	1
2,3,7,8-TCDF	8290A	pg/g	1
1,2,3,7,8-PeCDD	8290A	pg/g	5
1,2,3,7,8-PeCDF	8290A	pg/g	5
2,3,4,7,8-PeCDF	8290A	pg/g	5
1,2,3,4,7,8-HxCDD	8290A	pg/g	5
1,2,3,6,7,8-HxCDD	8290A	pg/g	5
1,2,3,7,8,9-HxCDD	8290A	pg/g	5
1,2,3,4,7,8-HxCDF	8290A	pg/g	5
1,2,3,6,7,8-HxCDF	8290A	pg/g	5
1,2,3,7,8,9-HxCDF	8290A	pg/g	5
2,3,4,6,7,8-HxCDF	8290A	pg/g	5
1,2,3,4,6,7,8-HpCDD	8290A	pg/g	5
1,2,3,4,6,7,8-HpCDF	8290A	pg/g	5
1,2,3,4,7,8,9-HpCDF	8290A	pg/g	5
Miscellaneous			
Asbestos	TEM Analysis	weight percent	0.1

Notes:
RL - Base Reporting Limit

TABLE B-2
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-GROUNDWATER SAMPLES

Analyte	*Method*	*Units*	*RL*
Radionuclides:			
Gross Alpha	900.0	pCi/L	3.0
Gross Beta	900.0	pCi/L	4.0
Radium-226	903	pCi/L	1.0
Radium-228	904	pCi/L	1.0
Actinium 228	901.1_Ra	pCi/L	Relative to Cs-137
Bismuth-210M	901.1_Ra	pCi/L	Relative to Cs-137
Bismuth-212	901.1_Ra	pCi/L	Relative to Cs-137
Bismuth-214	901.1_Ra	pCi/L	Relative to Cs-137
Cesium-134	901.1_Ra		Relative to Cs-137
Cesium-137	901.1_Ra	pCi/L	20
Cobalt-57	901.1_Ra	pCi/L	Relative to Cs-137
Cobalt-60	901.1_Ra	pCi/L	Relative to Cs-137
Lead-212	901.1_Ra	pCi/L	Relative to Cs-137
Lead-214	901.1_Ra	pCi/L	Relative to Cs-137
Potassium-40	901.1_Ra	pCi/L	20
Protactinium-231	901.1_Ra	pCi/L	Relative to Cs-137
Protactinium-234	901.1_Ra	pCi/L	20
Radium-224	901.1_Ra	pCi/L	20
Thallium-208	901.1_Ra	pCi/L	Relative to Cs-137
Thorium 228	901.1_Ra	pCi/L	Relative to Cs-137
Thorium-227	901.1_Ra	pCi/L	Relative to Cs-137
Thorium-228	901.1_Ra	pCi/L	Relative to Cs-137
Thorium-230	901.1_Ra	pCi/L	Relative to Cs-137
Thorium-232	901.1_Ra	pCi/L	Relative to Cs-137
Thorium-234	901.1_Ra	pCi/L	Relative to Cs-137
Uranium-238	Alpha Spectometry A01R_U	pCi/L	1
Thorium-230	Alpha Spectrometry A01R_Th	pCi/L	1
Uranium-233/234	Alpha Spectrometry A01R_U	pCi/L	1
Uranium-235/236	Alpha Spectrometry A01R_U	pCi/L	1
Metals:			
Aluminum	6010C	ug/L	200
Antimony	6010C	ug/L	10
Barium	6010C	ug/L	50
Beryllium	6010C	ug/L	5.0
Cadmium	6010C	ug/L	5.0
Calcium	6010C	ug/L	1000
Chromium	6010C	ug/L	10
Cobalt	6010C	ug/L	50
Copper	6010C	ug/L	25
Iron	6010C	ug/L	100
Lead	6010C	ug/L	10
Magnesium	6010C	ug/L	1000
Manganese	6010C	ug/L	15
Nickel	6010C	ug/L	40
Potassium	6010C	ug/L	5000
Selenium	6010C	ug/L	15
Silver	6010C	ug/L	10
Sodium	6010C	ug/L	1000
Vanadium	6010C	ug/L	50
Zinc	6010C	ug/L	20
Arsenic	6020A	ug/L	10
Thallium	6020A	ug/L	2.0
Uranuim	6020A	ug/L	1.0
Mercury	7470A	ug/L	0.2

TABLE B-2
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-GROUNDWATER SAMPLES

Analyte	*Method*	*Units*	*RL*
Volatile Organic Chemicals:			
Acetone	8260C	ug/L	20
Acetonitrile	8260C	ug/L	50
Benzene	8260C	ug/L	5.0
Bromobenzene	8260C	ug/L	5.0
Bromodichloromethane	8260C	ug/L	5.0
Bromoform	8260C	ug/L	5.0
Bromomethane	8260C	ug/L	10
2-Butanone (MEK)	8260C	ug/L	20
Carbon disulfide	8260C	ug/L	5.0
Carbon tetrachloride	8260C	ug/L	5.0
Chlorobenzene	8260C	ug/L	5.0
Chlorobromomethane	8260C	ug/L	5.0
Chloroethane	8260C	ug/L	10
Chloroform	8260C	ug/L	5.0
Chloromethane	8260C	ug/L	10
2-Chlorotoluene	8260C	ug/L	5.0
4-Chlorotoluene	8260C	ug/L	5.0
cis-1,2-Dichloroethene	8260C	ug/L	5.0
cis-1,3-Dichloropropene	8260C	ug/L	5.0
Cymene	8260C	ug/L	5.0
Dibromochloromethane	8260C	ug/L	5.0
Dibromomethane	8260C	ug/L	5.0
1,2-Dichlorobenzene	8260C	ug/L	5.0
1,3-Dichlorobenzene	8260C	ug/L	5.0
1,4-Dichlorobenzene	8260C	ug/L	5.0
Dichlorodifluoromethane	8260C	ug/L	10
1,1-Dichloroethane	8260C	ug/L	5.0
1,2-Dichloroethane	8260C	ug/L	5.0
1,1-Dichloroethene	8260C	ug/L	5.0
1,2-Dichloropropane	8260C	ug/L	5.0
1,3-Dichloropropane	8260C	ug/L	5.0
2,2-Dichloropropane	8260C	ug/L	5.0
1,1-Dichloropropene	8260C	ug/L	5.0
Ethanol	8260C	ug/L	250
Ethylbenzene	8260C	ug/L	5.0
2-Hexanone	8260C	ug/L	20
Isopropylbenzene	8260C	ug/L	5.0
Methylene Chloride	8260C	ug/L	5.0
Methyl iodide	8260C	ug/L	5.0
4-Methyl-2-pentanone (MIBK)	8260C	ug/L	20
Methyl tert-butyl ether	8260C	ug/L	5.0
m-Xylene & p-Xylene	8260C	ug/L	5.0
Naphthalene	8260C	ug/L	5.0
n-Butylbenzene	8260C	ug/L	5.0
N-Propylbenzene	8260C	ug/L	5.0
o-Xylene	8260C	ug/L	5.0
sec-Butylbenzene	8260C	ug/L	5.0
Styrene	8260C	ug/L	5.0
tert-Butylbenzene	8260C	ug/L	5.0
1,1,1,2-Tetrachloroethane	8260C	ug/L	5.0
1,1,2,2-Tetrachloroethane	8260C	ug/L	5.0
Tetrachloroethene	8260C	ug/L	5.0
Toluene	8260C	ug/L	5.0
trans-1,2-Dichloroethene	8260C	ug/L	5.0

TABLE B-2
ANALYTE LISTS FOR CONCEPTUAL SITE MODEL
SUPPLEMENTAL INVESTIGATION-GROUNDWATER SAMPLES

Analyte	*Method*	*Units*	*RL*
Volatile Organic Chemicals (continued):			
trans-1,3-Dichloropropene	8260C	ug/L	5.0
1,2,3-Trichlorobenzene	8260C	ug/L	5.0
1,2,4-Trichlorobenzene	8260C	ug/L	5.0
1,1,1-Trichloroethane	8260C	ug/L	5.0
1,1,2-Trichloroethane	8260C	ug/L	5.0
Trichloroethene	8260C	ug/L	5.0
Trichlorofluoromethane	8260C	ug/L	5.0
1,2,3-Trichloropropane	8260C	ug/L	5.0
1,2,4-Trimethylbenzene	8260C	ug/L	5.0
1,3,5-Trimethylbenzene	8260C	ug/L	5.0
Vinyl acetate	8260C	ug/L	5.0
Vinyl chloride	8260C	ug/L	5.0
Xylenes, Total	8260C	ug/L	10
Anions and TDS:			
Chloride	300.0_28D	mg/L	0.2
Nitrate As N	300_48HR	mg/L	0.02
Sulfate	300.0_28D	mg/L	0.5
Total Dissolved Soilids	160.1_Calcd	mg/L	5

Notes:
RL - Base Reporting Limit