



PROPOSED PLAN
BETTER BRITE PLATING COMPANY,
CHROME AND
ZINC SHOPS
DEPERE, WISCONSIN

EPA Region 5 Records Ctr.



254580

I. INTRODUCTION

The United States Environmental Protection Agency (U.S. EPA) has identified a preferred alternative to address the immediate threat posed by the contamination at the Better Brite Plating Company Chrome and Zinc Shops, located in DePere, Brown County, Wisconsin. This document is the Proposed Plan for the interim action alternative the U.S. EPA is considering for the Site. The Wisconsin Department of Natural Resources (WDNR) and the City of DePere have been active in the remedial action decision process. The Better Brite Site consists of two separate areas, the Chrome Shop and the Zinc Shop. This Proposed Plan addresses both of these locations.

This Proposed Plan presents and evaluates the U.S. EPA's proposal to continue the current action at the Better Brite Site, with some additional work. The alternatives summarized in this Proposed Plan are for the performance of an interim action, to address the contamination at the Better Brite Site. A final remedy will be proposed following a more in-depth remedial investigation (RI) of the Chrome and Zinc Shops and the contamination caused by the site. The WDNR, in a cooperative agreement with the U.S. EPA has begun an in depth study of the Better Brite Site. The study, known as the Remedial Investigation/Feasibility Study (RI/FS) is being initiated to further characterize the nature and extent of contamination present at the site and to identify and evaluate the feasibility of remediation alternatives to cleanup the site.

The preferred alternative, as presented in this Proposed Plan, is to: continue operation of the groundwater collection system; continue operation of the pretreatment facility; fencing to secure the site; well installation to ensure that the DePere drinking water supply is not contaminated; surface water control. This remedial action is needed to prevent contamination from threatening the public drinking water supply.

The pumped groundwater must be treated in order to meet wastewater pretreatment standards prior to discharge to the DePere wastewater treatment system. This interim action is therefore considered to be consistent with achieving a final site remedy.

The U.S. EPA is required by Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), to publish this Proposed Plan, describing its preferred alternative for responding to potential drinking water contamination problems at the Better Brite Plating Company Chrome and Zinc Shops. This Proposed Plan outlines the public's role in helping U.S. EPA make a final choice on a remedy, provides

background information on the site, describes the alternatives being considered, and explains the work remaining to be done at the site. A description of the criteria used to select U.S. EPA's preferred alternative is also included. The U.S. EPA will announce its decision on this cleanup proposal in a document entitled the Record of Decision (ROD), after the public comment period mentioned below.

II. OPPORTUNITIES FOR PUBLIC INVOLVEMENT

CERCLA requires the U.S. EPA to consider the views and opinions of the public prior to making a decision. Holding a public meeting is one way for all interested parties to learn of the U.S. EPA's proposal and provide input. Interested parties are encouraged to attend a public meeting scheduled for:

PUBLIC MEETING
May 9, 1991 7:30 p.m.
DePere City Hall
City Council Chamber
335 South Broadway
DePere, Wisconsin

Also, to encourage public participation in the selection process, the U.S. EPA has set a public comment period from May 1, 1991 through May 31, 1991. Interested parties are requested to comment on the alternatives discussed within this Proposed Plan. It should be noted that the remedy for the Better Brite Site will not be selected until the public comment period for the Proposed Plan is completed. The U.S. EPA may modify the preferred alternative from the Proposed Plan based on comments received during the public comment period. Oral and written comments will be accepted at the public meeting. A court reporter will be present at the public meeting to record oral comments. A Responsiveness Summary in the ROD will address all significant public comments received. Written comments should be sent to:

Susan Pastor, 5PA-14
 Community Relations Coordinator
 Office of Public Affairs
 U.S. Environmental Protection Agency
 230 South Dearborn Street
 Chicago, Illinois 60604
 (312) 353-1325
 Toll Free Number 1-800-621-8431
 9 a.m. to 4 p.m., weekdays

Written comments must be postmarked no later than May 31, 1991. U.S. EPA is not only soliciting public comments on the preferred alternative, but on the complete Proposed Plan. The Proposed Plan has been including in the administrative record have been placed in an information repository. Information repositories contain laws, work plans, community relations plans, and other documents relevant to the investigation and cleanup of Superfund sites. Anyone who would like additional information about the Better Brite Site is encouraged to consult the various documents available at the information repositories. For more information, visit:

Brown County Public Library,
DePere Branch
380 Main Avenue
DePere, Wisconsin

The administrative record file, which contains the information upon which the selection of the remedy will be based, is also available at the library.

For further information on the Better Brite Site, please contact either Susan Pastor, or:

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Office of Superfund
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604
(312) 886-1841

Terry Koehn
Wisconsin Department of
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1125 North Military Avenue
Green Bay, Wisconsin 54307
(414) 492-5869

III. SITE DESCRIPTION AND BACKGROUND INFORMATION

The two shops that make up the Better Brite Site are located in DePere, Wisconsin. The Chrome Shop is located less than one-half mile to the southeast of the Zinc Shop. The Better Brite Chrome and Zinc Shops have been combined as one site because of their close proximity, related background and joint nomination to the National Priorities List (NPL) on August 28, 1990. The WDNR and the U.S. EPA are currently developing remedial and enforcement activities to investigate and clean-up the site, in addition to the action proposed by this Proposed Plan. The description and history of each of the shops is as follows:

A. Better Brite Chrome Shop, 519 Lande Street, DePere, Wisconsin

The Chrome Shop is located in a residential neighborhood and abuts residential property on three sides with an active railroad track to the east on the fourth side. The topography is generally flat except on the west and south property edges where it slopes downward to the adjacent properties. Surface-water flow off site is therefore, generally to the south and west. Approximately 30 to 40 feet of reddish brown clay overlays the dolomite bedrock surface. The clay unit represents the area's shallow aquifer, which is contaminated at the sites. The deep aquifers consist of the dolomitic bedrock and underlying sandstone unit, from which drinking water is obtained. (See Figure 1)

The Chrome Shop began chrome plating in the early 1970's and used four vertical tanks placed into the ground 18 to 22 feet and several above-ground tanks in the plating process. Surface spills in 1978 and 1979 resulted in the construction of a shallow (15 feet deep) groundwater extraction system around a small portion of the site. This groundwater collection system is still in operation and pumps

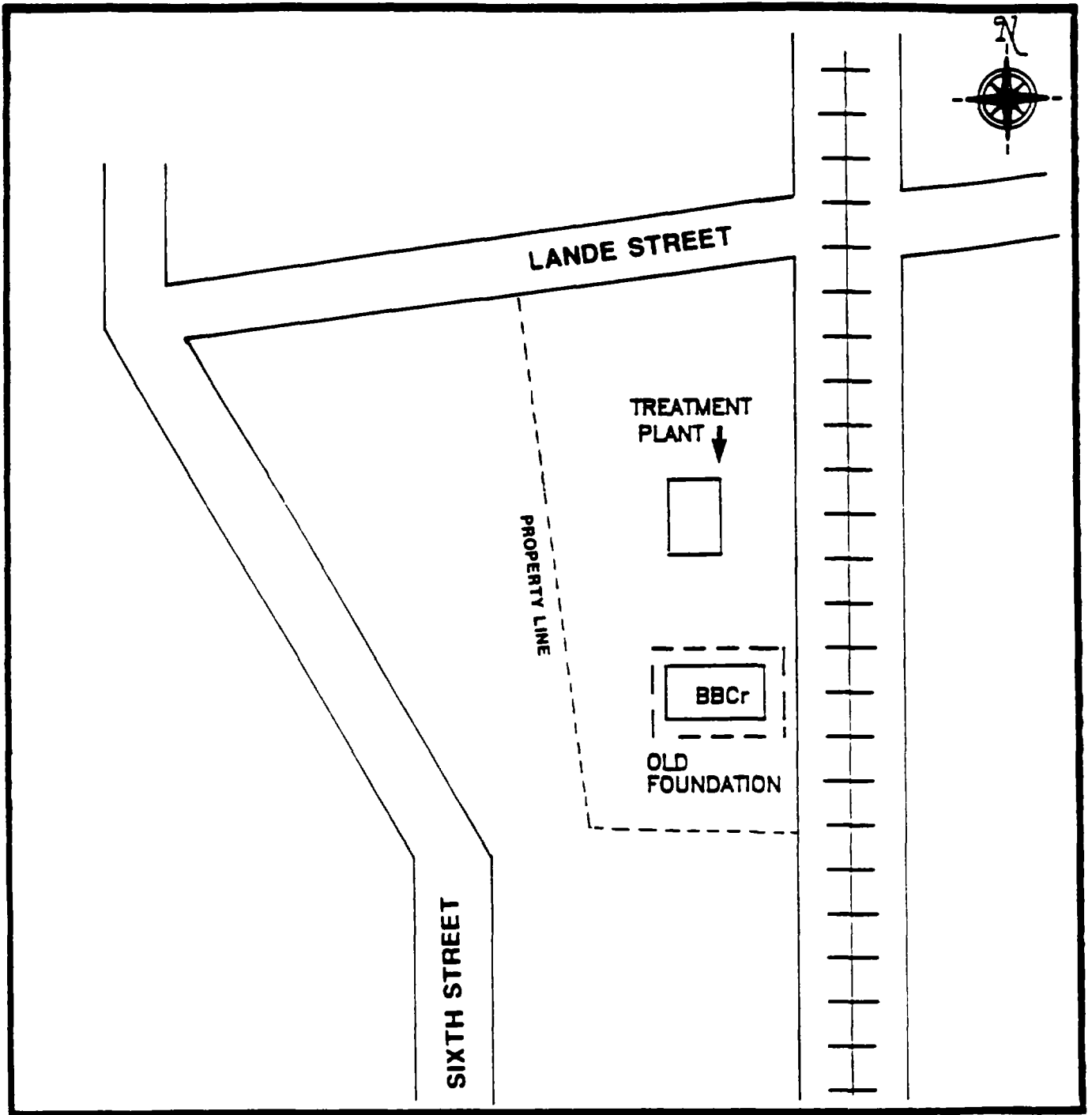


FIGURE 1
SITE MAP
BETTER BRITE CHROME
DEPERE, WISCONSIN
NOT TO SCALE

approximately 3,000 gallons a day during the wettest times of the year. It was later found that the underground plating tanks had leaked an unknown quantity of plating solution and volatile organic compounds (VOCs) directly into the groundwater. U.S. EPA's Superfund Emergency Response Section was called in and proceeded to remove some of the accumulated waste materials and contaminated soils. In the fall of 1987, Wisconsin's Environmental Fund installed groundwater monitoring wells at the site to investigate the extent of contamination. High levels of chromium and VOCs were found in soil borings and in the groundwater samples taken both on and off site. In 1989, the building was removed by a private contractor. Wisconsin's Environmental Fund was then used to construct a clay cap and to erect a fence in the area of highest soil contamination. The U.S. EPA Emergency Response Section constructed a wastewater pretreatment system to collect and pretreat shallow groundwater prior to its discharge to the DePere sanitary sewer. The system has been operating since October 1990. The City of DePere and the WDNR have currently agreed to perform operation and maintenance of the system for a two year period, to commence when Federal funds cease. The Better Brite Site has been referred to the State Department of Justice several times since 1979 for spill and hazardous waste violations. Those efforts have not proven successful to date.

B. Better Brite Zinc Shop, 315 South 6th Street, DePere

The Zinc Shop is located in a mixed residential and light industrial area approximately one half mile from the Chrome Shop. The site has residences located on three sides and a trucking company on the fourth side. The surface topography is generally flat. Surface water leaves the property to the north and east via natural contours. Soils near the site consist of thirty feet of lacustrine silty clay with lenses and seams of more permeable silts and sands above the dolomite bedrock. The groundwater flow direction is to the northwest and has a strong downward gradient flow. There is a municipal well located approximately 300 feet to the northwest which is thought to influence the groundwater flow in the shallow aquifer and the deeper bedrock aquifers. No security fencing is currently in place for the Zinc Shop. (See Figure 2)

The Zinc Shop operated from 1963 to 1989. Prior to moving the chrome plating operation to the Lande Street location, this facility plated chrome in deep, vertical plating tanks similar to what was constructed at the Chrome Shop. File information indicates that these tanks were never properly abandoned but merely covered up with a concrete floor and continued to be a source of contamination. Since the early 1970s, after the chrome plating operations moved to Lande Street, the facility primarily plated zinc. The facility has a long history of poor operation and spills onto the surrounding soils. Wastewater and solutions routinely leaked between the floor and sill plate of the building along the south and east walls. In 1987, the Wisconsin Environmental Fund installed wells to monitor groundwater quality. Sample results obtained from these wells showed the soil and

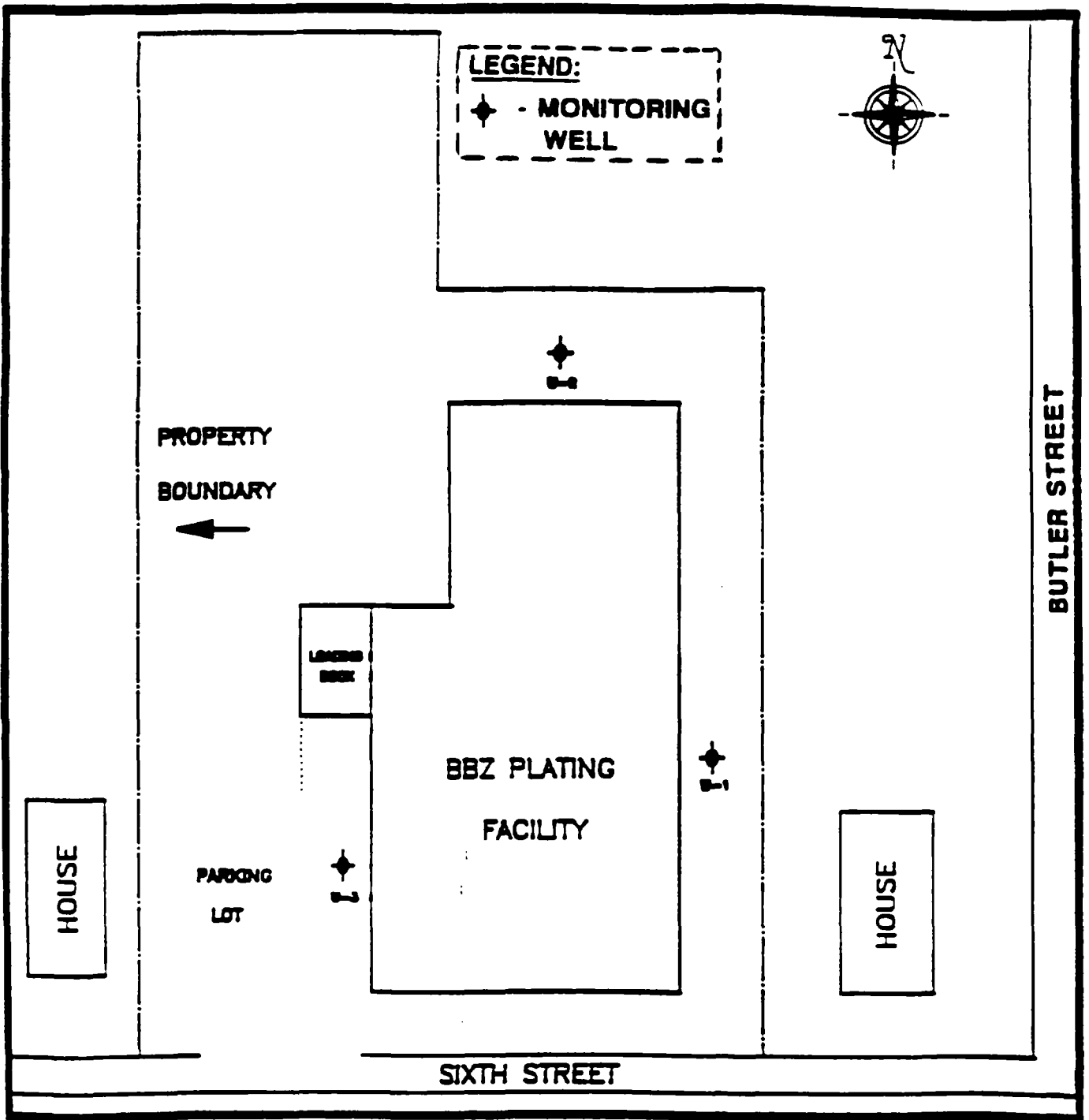


FIGURE 2
 SITE MAP
 BETTER BRITE ZINC
 DEPERE, WISCONSIN
 NOT TO SCALE

groundwater around the building to be contaminated with heavy metals, cyanide and VOCs. Chrome was found in the basement of an adjoining residence located directly south of the facility.

In July 1990, the U.S. EPA Emergency Response Section containerized and shipped some hazardous and solid waste off site. A groundwater collection sump was constructed along the east side of the building. The sump began operation in August 1990. So far, approximately 12,000 gallons of contaminated groundwater have been pumped out. Additional groundwater is pumped as the collection sump recharges.

IV. SCOPE AND ROLE OF RESPONSE ACTION

Better Brite Plating Company Chrome and Zinc Shops contamination problems are complex as is the case with many Superfund sites. The contaminated area at both shops, may represent a potential threat to residents in the immediate area who use the groundwater for drinking. Direct contact with the sites is also a potential threat. Since the RI components for aquifer and soil remediation will take an extended period of time to complete, the U.S. EPA and WDNR are proposing an interim action. This interim action will continue and expand upon the ongoing activities to reduce the contamination source, protect the municipal drinking water supply through additional monitoring well installation, reduce ponding by control of surface water runoff, and to limit direct contact to neighboring residents and trespassers by securing the site. EPA Emergency Response Branch's groundwater pumping and operation of the pretreatment facility will expire in October 1991. This proposed plan and subsequent ROD are necessary for EPA continue this operation. Limited additional actions will also be taken to minimize direct contact with contamination. This interim action, as described in this Proposed Plan, is considered consistent with the final site remediation.

V. SUMMARY OF SITE RISKS

A baseline risk assessment will be part of the RI/FS which will be completed later. However, site risks can be estimated from the following presently available information.

Currently, monitoring of the municipal wells has not shown site related contaminants in the municipal water supply. However, investigations conducted at the Chrome and Zinc Shops did find that chromium contamination increases with depth in the monitoring wells installed within the shallow aquifer. The shallow aquifer beneath the site recharges or leaks into the deeper aquifer, which is the source of drinking water for DePere and some of the surrounding communities. If the levels of chromium and other contaminants increase and are allowed to spread, contamination will eventually degrade the deeper aquifer and potentially reach municipal water supplies. The deep aquifer and municipal wells are vulnerable to contamination from the Chrome and Zinc Shops because the deep aquifer is geologically open to infiltration from the shallow aquifer above. There are reportedly private wells in the deep aquifer which are located near the sources of contamination.

To date, a number of contaminants have been detected in the groundwater, surface water and soil near the site. Contaminants found during past site investigations are as follows:

<u>Contaminant</u>		
Tetrachloroethylene	DDT	Lead
Benzene	Cadmium	Cyanide
1,1-Dichloroethane	Chromium	
1,1,1-Trichloroethane	Barium	

Table 1 shows the levels of contaminants found in the groundwater and the respective Federal and State groundwater standards for the contaminants. The results presented in Table 1 are from sampling performed by the WDNR on October 16, 1989. Figure 3 shows the locations of the wells sampled. The maximum contaminant levels (MCL) as set by the Federal Safe Drinking Water Act are identified in the Table. Also, the Enforcement Standards and the Preventative Action Limits (PALs), as set by the Wisconsin Code of Regulations NR 140, are also listed. If no remedial action is taken at the Better Brite site, the contamination could eventually effect drinking water supplies.

Based on the information supplied to U.S. EPA, the Agency has determined that a person using water supplied by private wells in the dolomite aquifer, is at a possible future risk of exposure to drinking water contaminated with VOCs and metals. This possible risk of exposure is assumed based on levels of contamination present within the shallow aquifer. It is possible that contaminants may reach the sandstone aquifer and introduce potential risks to the municipal drinking water supply. In addition, there is a potential for the public to come into contact with contaminated water that may either be ponding on the surface or seeping into an adjacent basement. In either of these situations, there is a potential for the public to come into contact with contaminated drinking water, surface water or soil.

VI. SUMMARY OF ALTERNATIVES

Pursuant to CERCLA, U.S. EPA must follow a series of steps for choosing a plan to protect human health and the environment from an actual or potential threat of contamination. U.S. EPA is required to consider a number of possible alternatives and then evaluate them according to certain standards or criteria (See Section VII).

In order to continue to minimize an actual or potential imminent threat to human health and the environment in the Better Brite site area, the U.S. EPA is proposing to continue the ongoing removal actions and take additional limited action now instead of waiting for the conclusion of the RI/FS. The proposed Interim Action alternative includes pretreatment of the groundwater and added site security as described below. This proposed cleanup alternative is evaluated against a "no-action" alternative to determine whether this interim cleanup action is necessary or appropriate to prevent public exposure to contamination; to ensure that it will not increase

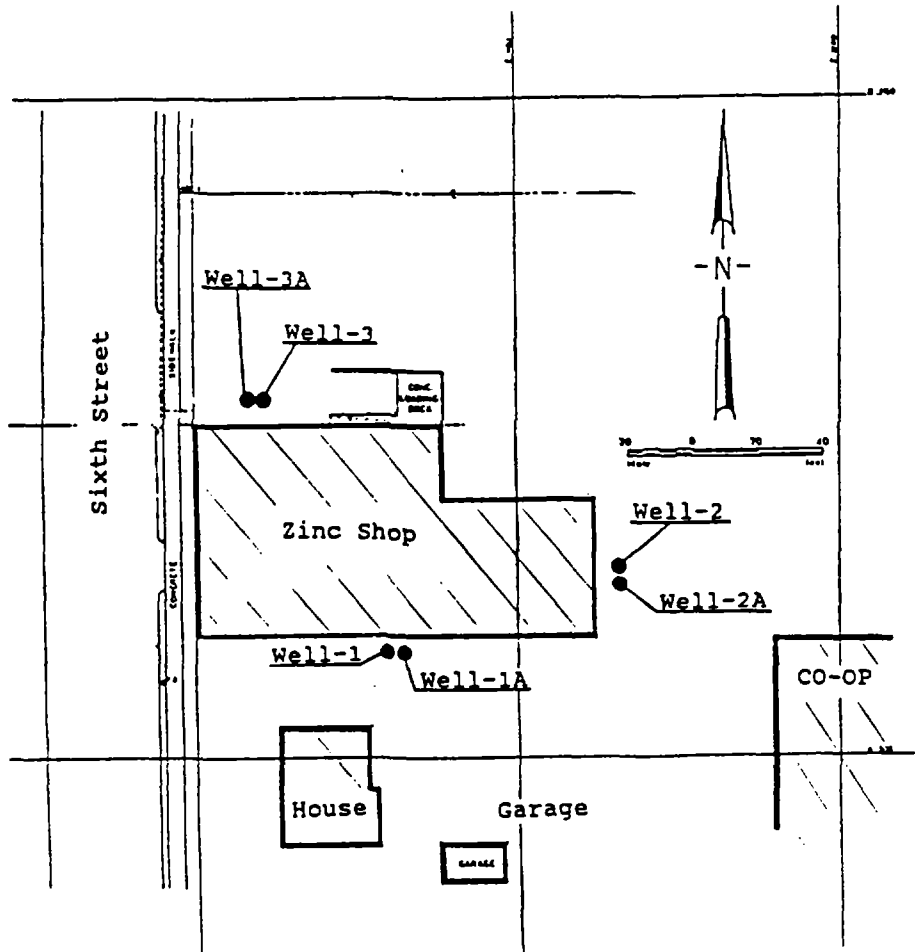
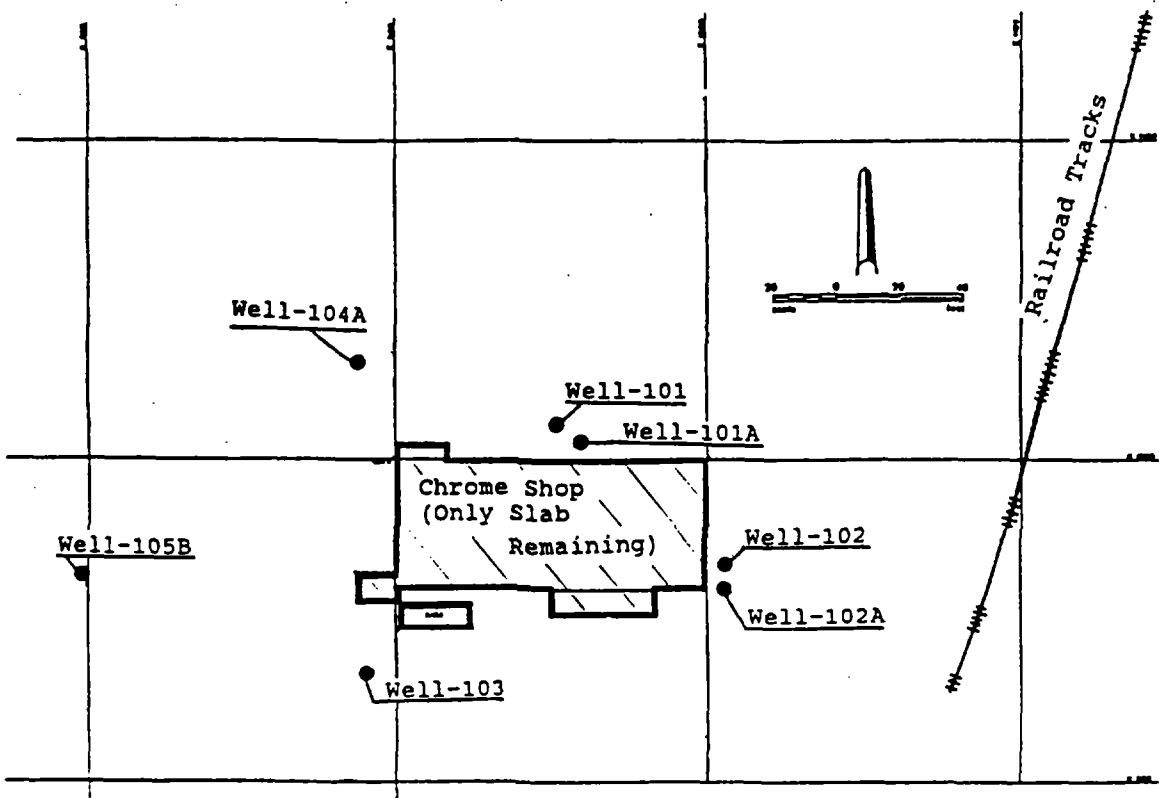


FIGURE 3

contamination problems around the shops; and to ensure that the Interim Action is consistent with any final cleanup plan for the site. Alternatives for the site are as follows:

Alternative #1 - No Action: U.S. EPA would not take any action. The pretreatment facility presently controlling the source of contamination would cease operating. Untreated contaminated groundwater would enter the City of DePere's wastewater system. On-site and off-site contaminated soils would remain. Site security would continue to be inadequate to properly deter trespassers. There is no cost associated with this alternative. Applicable or relevant and appropriate requirements (ARARs) would not be addressed by this alternative.

Alternative #2 - Pretreatment Facility Operation: This alternative will work in tandem with subsequent source control and aquifer remediation measures. With this alternative, groundwater at the Chrome and Zinc Shops will continue to be collected, treated and modified before being discharged into the City of DePere's wastewater system. Surface water runoff at the Chrome Shop will be controlled with additional ground contouring and berming. This will reduce the possibility for ponding of contaminated water offsite. The operation and maintenance of the pretreatment plant would be continued until a final remedy is implemented.

Because of possible exposure at the Zinc Site, U.S. EPA plans on securing the site with fencing and applying more durable materials on the building's exterior. Deep groundwater monitoring wells will also be installed near the municipal wells to monitor the sandstone and dolomite aquifers. In addition, miscellaneous site restoration may be conducted on a as needed basis.

It is not known how long this Interim Action would continue to be necessary. It is anticipated that this Interim Action will last at least 5 years or until the final cleanup plan regarding restoration of the contaminated aquifer and contaminated soils has been selected and completely implemented.

The implementation of this alternative will continue to intercept contaminated groundwater and pretreat it prior to discharge to the City of DePere's wastewater system, and will increase site security to discourage trespassing. By doing so, any actual or potential imminent threats will be minimized.

ARARs will be met given the limited scope of the Interim Action. These include ARARs regarding wastewater pretreatment standards, well installation requirements, Wisconsin waste management guidelines, and waste management requirements for any pretreatment residuals including hazardous waste regulations. All ARARs will be met with the subsequent final remedial action for the site.

Approximate associated costs for this alternative are as follows:

Estimated Construction Cost: \$440,000

Estimated Annual Operation and Maintenance Cost: \$60,000

Estimated Present Worth: \$500,000

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ARARs will be met given the limited scope of the Interim Action. These include ARARs regarding wastewater pretreatment standards, well installation requirements, Wisconsin waste management guidelines, and waste management requirements for any pretreatment residuals including hazardous waste regulations. Final remedial action for the site will meet all ARARs.

Approximate associated costs for this alternative are as follows:

Estimated Construction Cost: \$440,000
Estimated Annual Operation and Maintenance Cost: \$60,000
Estimated Present Worth: \$500,000

VII. EVALUATION OF ALTERNATIVES

To evaluate the alternatives presented in this Proposed Plan, the U.S. EPA uses the following nine criteria. The first seven criteria are used in evaluating all the alternatives, with more emphasis on the Threshold Criteria. The Threshold Criteria need to be met by any final remedial action chosen, while the Primary Balancing Criteria and the Modifying Criteria are used to further evaluate the alternatives, selecting an alternative based on the best balancing of all the criteria. The Modifying Criteria, are used to further assess U.S. EPA's Proposed Plan after the public comment period is over and comments from the community have been received. Again, the selection of a preferred alternative in this Proposed Plan is preliminary and could change in response to public comment or other new information. The criteria are as follows:

THRESHOLD CRITERIA:

OVERALL PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT addresses whether or not a remedy provides adequate protection of human health and the environment and describes how risks are posed through each pathway are eliminated, reduced or controlled through treatment, engineering controls, or institutional controls.

COMPLIANCE WITH ARARS (APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS) addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other Federal and State environmental statutes and/or provide grounds for invoking a waiver. An Interim Action or operable unit need not meet all ARARs but any subsequent final remedial action must satisfy all ARARs or meet the criteria justifying waiving of an ARAR.

PRIMARY BALANCING CRITERIA:

LONG-TERM EFFECTIVENESS AND PERMANENCE refers to expected residual risk and the ability of a remedy to maintain reliable protection of human health and the environment over time, once cleanup goals have been met.

REDUCTION OF TOXICITY, MOBILITY, OR VOLUME THROUGH TREATMENT is the anticipated performance of the treatment technologies a remedy may employ.

SHORT-TERM EFFECTIVENESS addresses the period of time needed to achieve protection, and any adverse impacts on human health and the environment that may be posed during the construction and implementation period, until cleanup goals are achieved.

IMPLEMENTABILITY is the technical and administrative feasibility of a remedy, including the availability of materials and services needed to implement a particular option.

COST includes estimated capital and operation and maintenance costs, also expressed as net present worth costs.

MODIFYING CRITERIA:

STATE ACCEPTANCE reflects aspects of the preferred alternative and other alternatives that the State favors or objects to, and any specific comments regarding the State ARARs or the proposed use of waivers. The Proposed Plan should address views known at the time the plan is issued but should not speculate. The assessment of State concerns may not be complete until after the public comment period is held.

COMMUNITY ACCEPTANCE summarizes the public's general response to the alternatives described in the Proposed Plan, based on public comments received. Like State Acceptance, evaluations under this criterion usually will not be completed until after the public comment period is held.

See Table 2 for an evaluation of the alternatives for the site using these criteria.

Table 2
Evaluation of Interim Action Alternatives

Threshold Criteria:

1) Overall protection of human health and the environment;

Alternative #1: Imminent threats to public health or the environment would not be reduced or eliminated. Contaminants may reach unsafe levels in the public drinking water supply and in residential areas. Risks due to direct contact to contaminants will still exist.

Alternative #2: Imminent threats to human health due to ingestion of contaminated groundwater would be minimized by controlling the source of contamination. Exposure to VOCs, heavy metals, and other contaminants would be reduced during the time it takes to determine the final cleanup for the Better Brite sites. This alternative is protective, considering the limited scope of action.

2) Compliance with applicable or relevant and appropriate requirements (ARARS):

Alternative #1: There have and will continue to be levels of contaminants which reach or exceed U.S. EPA and WDNR MCLs, Enforcement Standards and/or PALs in the groundwater. ARARS will not be met with this alternative.

Alternative #2: Prior to discharge to the City of DePere wastewater system, the collected groundwater and surface water will need to be treated to meet the pretreatment standards as set by the receiving Publicly Owned Treatment Works, pursuant to the Clean Water Act.

Wisconsin's Waste Management guidelines will be followed when managing the pretreatment residuals. Disposal of any residuals resulting from the pretreatment system or from the excavation of contaminated soils will need to meet applicable State and Federal disposal regulations including Resource Conservation and Recovery Act (RCRA) Land Disposal Regulations. Within the scope of this Interim Action PALs ARARS will be met by this alternative.

Primary Balancing Criteria:

3) Long-term effectiveness:

This criteria is not applicable to this action since this action is deemed an Interim Action. This Interim Action is intended to provide protection to human health and the environment in the short term, until a final remedy is selected and implemented.

Modifying Criteria:

8) State Acceptance:

This criteria will be addressed in the Record of Decision. The WDNR has been actively involved in past and present activities at this site.

9) Community Acceptance:

This criteria will be addressed in the Responsiveness Summary, attached to the ROD.

VIII. U.S. EPA'S PREFERRED ALTERNATIVE

The U.S. EPA's preferred alternative for the Interim Action is Alternative #2. This alternative includes the following actions:

- * Continue and expand the current operation of the pretreatment facility, by including the pretreatment of water collected by surface water collection systems and groundwater extraction systems at both the Chrome and Zinc Shops. Improve surface water drainage at the shops and collect the surface water runoff from the shops, preventing contamination from leaving the shop areas. Modify the groundwater collection systems as appropriate at both the Zinc and Chrome Shops
- * Secure the site, as appropriate, to deter trespassers from accessing the site.
- * Install deep monitoring well(s) to better monitor potential contamination within the groundwater utilized in the area for drinking.

Approximate associated costs for the preferred alternative are as follows:

Estimated Construction Cost: \$440,000
 Estimated Annual Operation and Maintenance Cost: \$60,000
 Estimated Present Worth: \$500,000

IX. SUMMARY

The preferred alternative, Alternative #2, will protect human health by limiting the public from exposure to contaminated surface water, groundwater, and soils during the performance of the RI/FS at the site and subsequent final remedial action for the Better Brite Site. The Interim Action, called for by the preferred alternative, will provide contaminant source control which will limit the spread of contamination from beyond the Shop areas until a final remedial action is selected and implemented. U.S. EPA believes that the preferred alternative is cost effective and is consistent with any subsequent final remedial action for the site. The preferred alternative is designed to meet the City of DePere's wastewater standards. Any residuals from the pretreatment facility or excavated contaminated soils will be

managed in accordance with Wisconsin's Waste Management guidelines and will meet Federal and State regulations governing off-site disposal, including

RCRA's Land Disposal Restrictions. Any ARARs not met by the Interim Action will be met by the subsequent final remedial action or criteria for an ARAR waiver will be met.

In summary, the preferred alternative is believed to provide the best balance of trade-offs among alternatives with respect to the criteria used to evaluate remedies. Based on the information available at this time, U.S. EPA believes the preferred alternative would protect human health and the environment, would comply with ARARs within the limited scope of the Interim Action, would be cost effective, would utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable, would satisfy the preference for treatment as a principal element, and would be consistent with any subsequent final remedial action selected for the Better Brite Plating Company, Chrome and Zinc Shops.

This preferred alternative does not propose to resolve the contamination problems at the Better Brite Plating Company Chrome and Zinc Shops, but is intended to act as an Interim Action until a final remedy is selected and implemented. Additional investigation work will be conducted by the WDNR and the U.S. EPA to more extensively study the contamination in and around the Chrome and Zinc Shops. When the agencies have developed plans to address the remaining contamination, as to be documented by the RI/FS, they will notify the community and will hold a public meeting to discuss findings of the RI/FS and any proposed final action to address the Better Brite site.

Table 1:
Groundwater Sample Results (ppb)

WDNR October 16, 1989

<u>Chrome Shop</u> Well #	Chromium	Cadium	Lead	Zinc	1,1,1 -Trichloro ethane	1,1 -Dichloro ethane	Cyanide
101	<100	<20	<100	<20	ND	ND	NA
101A	<100	<20	<100	<20	15	1.2	-
102	<100	<20	<100	<20	ND	ND	-
102A	<100	<20	<100	410	ND	ND	-
103	1000	<20	<100	<20	500	27	-
104A	<100	<20	<100	<20	53	16	-
105B	30,000	<20	<100	<20	69	7	-

Zinc Shop

Well #	Chromium	Cadium	Lead	Zinc	1,1,1 -Trichloro ethane	1,1 -Dichloro ethane	Cyanide
1	160	<20	<100	<20	21	2.2	100
1A	570	<20	<100	<20	4	1.6	160
2	38000	<20	<100	<20	ND	ND	80
2A	48000	<20	<100	24	5.3	ND	230
3	6600	<20	<100	<20	100	9.8	90
3A	35000	<20	<100	<20	400	35	170
MCL	100	5	50	-	200	-	200
ES	50	10	50	5000**	200	850	200
PAL	5	1	5	2500**	40	85	40

MCL - Federal Safe Drinking Water Act, Maximum Contaminant Level

ES - WAC NR140 Enforcement Standard

PAL - WAC NR140 Preventative Action Level

A and B Indicates Wells Locations

ND - Not Detected

NA - Not Analyzed

** Stated Limit for Zinc is Public Welfare Standard

< - Less than