

Wisconsin Public Service Corporation

700 North Adams Street P.O. Box 19001 Green Bay, WI 54307-9001

www.wisconsinpublicservice.com

December 11, 2018

Ms. Margaret Gielniewski
Project Manager
United States Environmental Protection Agency
77 W. Jackson Blvd.
Chicago, Illinois 60604-3590

RE: November 2018 Monthly Progress Report
Marinette Former Manufactured Gas Plant
Marinette, Wisconsin
Wisconsin Public Services Corporation
CERCLA Docket No V-W-18-C-009, Site Spill ID – B5BT,
CERCLIS ID – WIN000509952

Dear Ms. Gielniewski:

Wisconsin Public Services Corporation (WPSC) is providing this monthly progress report for the WPSC Marinette Former Manufactured Gas Plant (MGP) Site.

1) PROGRESS MADE DURING THE PAST MONTH

- Prepared and submitted October 2018 Monthly Progress Report to United States Environmental Protection Agency (USEPA) by November 15, 2018.
- Met with USEPA, DOJ and WDNR on November 20, 2018 regarding the Consent Decree for remedial action.
- Commenced development of a response to comments letter and corresponding update the Preliminary Design Investigation Work Plan based on USEPA comments.

2) ANALYTICAL AND OTHER TESTING RESULTS RECEIVED

 Received analytical data packages from the fall 2018 groundwater sampling event and uploaded into the site database. Analytical data packages and preliminary screening tables are included as an attachment to this monthly progress report.

3) PROJECTED WORK

WPSC Actions

- Submit monthly progress report to USEPA by the 15th of the month.
- Continue development of Preliminary Design Investigation Work Plan Revision 1 while waiting for additional comment from USEPA.

USEPA Actions

 Continue additional internal discussion regarding principal threat waste definition and provide guidance prior to WPSC issuance of Preliminary Design Investigation Work Plan Revision 1.

4) PROBLEMS OR POTENTIAL PROBLEMS ENCOUNTERED

None

5) ACTUAL OR PLANNED RESOLUTION OF PROBLEMS OR POTENTIAL PROBLEMS

None

If you have any questions, please don't hesitate to contact me at (414) 221-2156 or via email at frank.dombrowski@wecenergygroup.com.

Sincerely,

Frank Dombrowski

Principal Environmental Consultant

WEC Business Services - Environmental Dept.

Enclosures:

Site Map

Fall 2018 Groundwater Analytical Results Screening Tables

For distribution to:

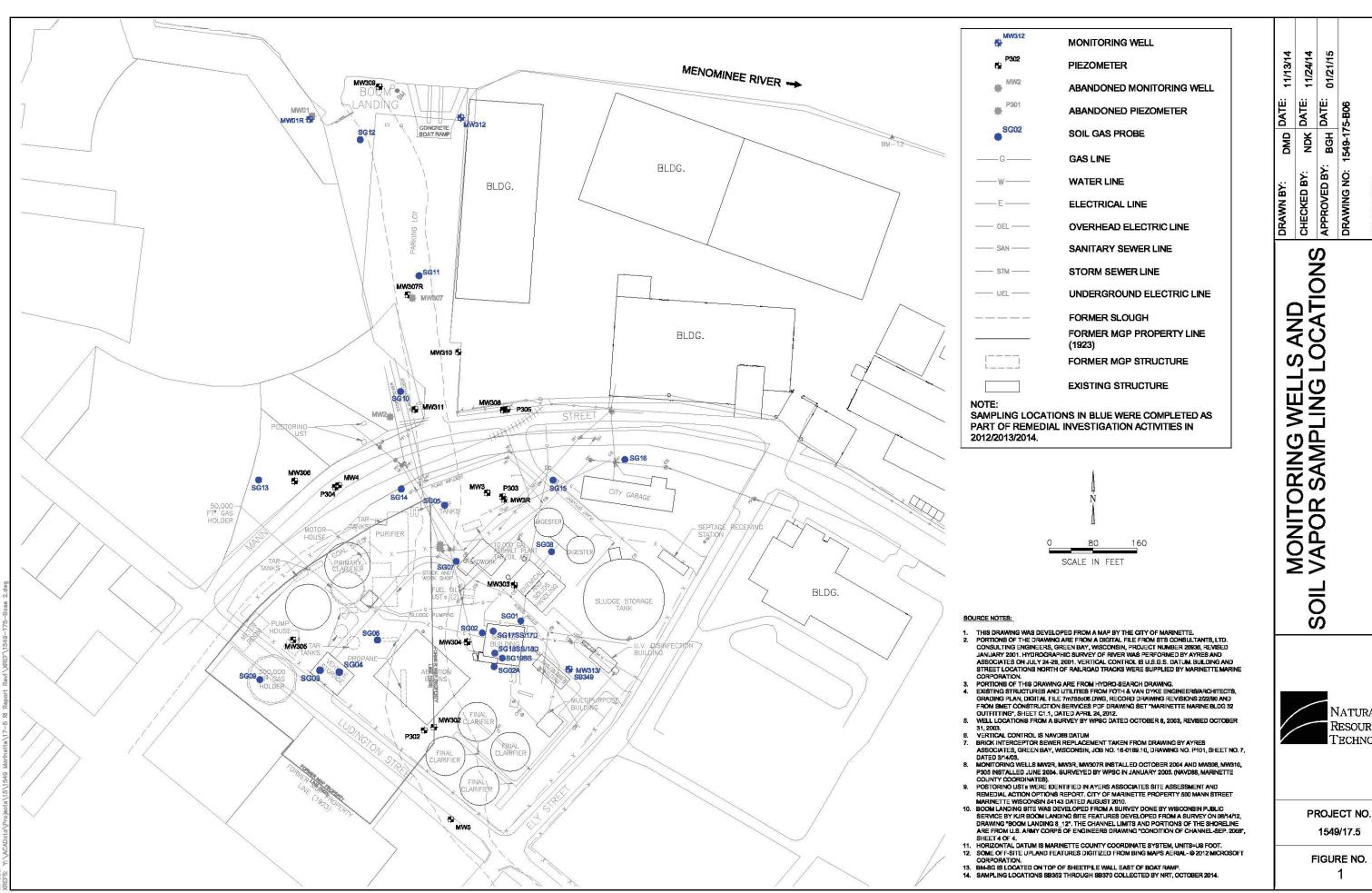
Mr. Kevin McKnight, WDNR (via email)

Mr. Bill Fitzpatrick, WDNR (via email)
Ms. Cheryl Bougie, WDNR (via email)

WDNR Northeast Region (via email to DNRRRNER@wisconsin.gov)

Ms. Jennifer Knoepfle, Jacobs (via email)

Mr. Marcus Byker, OBG (via email)



01/21/15

APPROVED BY: DRAWING NO:

1549-175-B06

Natural

1549/17.5

RESOURCE

TECHNOLOGY

October 2018 Groundwater Sampling Results

Wisconsin Public Service Corporation - Marinette Former MGP, Marinette, Wisconsin

CERCLIS ID -WIN000509952

			BTEX	BTEX	BTEX	BTEX	BTEX	BTEX	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH
9-digit Code	Station Name	Sample Date	Benzene	Ethylbenzene	Toluene	Xylene, o	Xylenes, m + p	Xylenes, Total	Anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g,h,i)perylene	Chrysene	Fluoranthene	Fluorene	Naphthalene	Phenanthrene	Pyrene
		Reporting Units:	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L
		, ,	Result Fla					Result Flag				,				Result Flag	Result Flag	Result Flag
	WI Groundwater SL:			700	800	NS	NS	2,000	3,000	0.2	0.2	NS	0.2	400	400	100	3,000	250
		roundwater PAL:	5	140	160	NS NS	NS NS	400	600	0.02	0.02	NS NS	0.02	80	80	100	NS NS	50
	<u> </u>	Tap Water RSL:	0.46	1.5	1,100	190	190	190	1,800	0.025	0.02	120	25	800	290	0.17	1,800	<u>30</u> 120
		. sp ster not.	00	1.5	2,200	-25		250	2,000	5.525	5.25				250	U.2.	2,000	
100918016	MW01R	10/09/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	< 0.011 U	< 0.012 U	< 0.0063 U	< 0.0075 U	< 0.014 U	< 0.012 U	< 0.0088 U	0.063 J	< 0.015 U	< 0.0084 U
100918012	MW03R	10/09/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	0.043 J	<u>0.024</u> J	0.059	0.049	<u>0.051</u> J	0.060	< 0.0084 U	< 0.019 U	0.016 J	0.064
100818008	MW05	10/08/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	< 0.010 U	< 0.010 U	< 0.0057 U	< 0.0067 U	< 0.013 U	< 0.011 U	< 0.0079 U	< 0.018 U	< 0.014 U	< 0.0076 U
100818002	MW302	10/08/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	0.017 J	0.011 J	0.018 J	0.014 J	0.015 J	0.017 J	< 0.0084 U	< 0.019 U	< 0.015 U	0.022 J
100818006	MW303	10/08/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	0.028 J	< 0.011 U	< 0.0060 U	< 0.0071 U	< 0.014 U	< 0.011 U	< 0.0083 U	< 0.019 U	< 0.014 U	0.032 J
100818004/100818005 (N)	MW304	10/08/2018	<u>11.1</u>	1.2	0.88 J	1.9	1.2 J	3.1	0.084	< 0.011 U	< 0.0057 U	< 0.0068 U	< 0.013 U	0.046 J	0.071	< 0.018 U	0.033 J	0.024 J
100818001	MW305	10/08/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	< 0.011 U	< 0.011 U	0.0069 J	< 0.0069 U	< 0.013 U	< 0.011 U	< 0.0081 U	< 0.019 U	< 0.014 U	< 0.0078 U
100918015	MW306	10/09/2018	< 0.25 U	10.6	< 0.17 U	34.0	24.7	58.8	< 0.034 U	< 0.035 U	< 0.019 U	< 0.022 U	< 0.043 U	< 0.035 U	0.036 J	41.3	< 0.045 U	0.17
100918018/100918019 (N)	MW307R	10/09/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	0.12	0.012 J	<u>0.029</u> J	0.020 J	<u>0.047</u> J	0.25	0.40	0.056 J	0.34	0.27
100918010	MW308	10/09/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	< 0.011 U	< 0.011 U	0.011 J	< 0.0071 U	< 0.014 U	< 0.011 U	< 0.0083 U	< 0.019 U	< 0.014 U	0.010 J
100918020	MW310	10/09/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	0.046 J	< 0.011 U	0.0098 J	< 0.0071 U	< 0.014 U	0.11	1.1	0.020 J	< 0.015 U	0.11
100918021	MW311	10/09/2018	<u>154</u>	114	8.8 J	64.1	20.0 J	84.1	2.7	< 0.44 U	< 0.24 U	< 0.28 U	< 0.54 U	1.9 J	19.5	<u>585</u>	16.3	2.4
100918017	MW312	10/09/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	0.030 J	< 0.011 U	< 0.0060 U	< 0.0071 U	< 0.014 U	0.073	0.18	0.035 J	0.10	0.078
100818007	MW313	10/08/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	0.017 J	< 0.011 U	0.016 J	0.013 J	< 0.014 U	0.016 J	0.017 J	0.027 J	< 0.014 U	0.020 J
100818003	P302	10/08/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	< 0.011 U	< 0.011 U	< 0.0062 U	< 0.0073 U	< 0.014 U	< 0.011 U	< 0.0086 U	< 0.020 U	< 0.015 U	< 0.0082 U
100918013	P303	10/09/2018	< 0.25 U	+	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	< 0.010 U	< 0.011 U	0.011 J	0.010 J	< 0.013 U	0.014 J	< 0.0080 U	< 0.018 U	0.020 J	0.018 J
100918014	P304	10/09/2018	< 0.25 U	< 0.22 U	< 0.17 U	< 0.26 U	< 0.47 U	< 1.5 U	< 0.012 U	< 0.012 U	< 0.0067 U	< 0.0079 U	< 0.015 U	< 0.012 U	< 0.0093 U	< 0.021 U	< 0.016 U	< 0.0089 U
100918011	P305	10/09/2018	<u>0.62</u> J	0.26 J	0.25 J	< 0.26 U	< 0.47 U	< 1.5 U	0.25	< 0.011 U	< 0.0060 U	< 0.0071 U	< 0.014 U	1.1	3.5	<u>10.6</u>	0.96	0.91
	<u> </u>	•		<u>'</u>	<u> </u>						'	-		1				
Total Number of Samples Analyzed:			18	18	18	18	18	18	18	18	18	18	18	18	18	18 8	18 7	18
	Numb	er of Detections: Min:	3 0.62	4 0.26	3 0.25	3 1.9	3 1.2	3 3.1	10 0.017	3 0.011	8 0.0069	5 0.01	3 0.015	10 0.014	8 0.017	8 0.02	0.016	13 0.01
		Max:	154	114	8.8	64.1	24.7	84.1	2.7	0.011	0.059	0.01	0.013	1.9	19.5	585	16.3	2.4
	WI	Groundwater SL:	5	700	800	NS	NS	2,000	3,000	0.2	0.2	NS	0.2	400	400	100	3,000	250
Number of Sam	Number of Samples that Exceed WI Groundwater SL:			0	0	0	0	0	0	0	0	0	0	0	0	1	0	0
WI Groundwater PAL:			0.5	140	160	NS	NS	400	600	0.02	0.02	NS	0.02	80	80	10	NS	50
Number of Sampl	Number of Samples that Exceed WI Groundwater PAL:			0	0	0	100	0	1 200	1	2	0	2	0	0	3	1 200	120
Number of	Samples that Exceed	d Tap Water RSL:	0.46	1.5	1,100	190	190 0	190 0	1,800	0.025	0.25	120	25 0	800	290	0.17	1,800 0	120 0
INGITIDET OF			<u> </u>	<u> </u>	<u> </u>	U U		1 0	1 0	1 0	<u> </u>	1 0	1 0	3	l o	U		

Sorted by 9-digit Code

Analyte concentration exceeds the standard for:

BOLD	Groundwater SL				
<u>Underline</u>	WI Groundwater PAL				
Italic	Tap Water RSL				

Pink highlighting = result exceeds the Groundwater SL; Tap Water or PAL exceedances are not

highlighted if they do not also exceed the Groundwater SL

Yellow highlighting = one or more exceedances detected
Statistics exclude the quality control samples (Equipment and Trip blanks)

PAL from Chapter NR 140 for Groundwater Quality from Wisconsin Admin Code (Feb 2017)
Lab comments, additional data qualifiers and definitions can be found in associated laboratory reports.

Groundwater and Tap Water Screening Levels used on this table were presented in the Multi-Site Risk Assessment Framework (RAF) Addendum Revision 6, issued in August 2017. Since that time, three revisions of the RSLs have been published by EPA in November 2017, May 2018, and November 2018. As a result of these three revisions, there were no updates to the RSLs necessary for the MGP-related constituents evaluated in this table.

-- = Analysis not performed

(N) = Normalized sample locations created from combining parent and field duplicate samples following EPA protocol

< = Concentration is less than the Limit of Detection (LOD)

μg/L = micrograms per liter

μS/cm = microsiemens per centimeter (aka micromhos per centimeter)

BTEX = Benzene, Toluene, Ethylbenzene and Xylene

Deg C = degrees Celsius

J = Concentration Estimated

mg/L = milligrams per liter

MGP = Manufactured Gas Plant

NS = No Standard

NTU = Nephelometric Turbidity Unit

PAH = Polycyclic Aromatic Hydrocarbon

 ${\sf PAL} = {\sf Preventive} \ {\sf Action} \ {\sf Limit}; \ {\sf results} \ {\sf that} \ {\sf attain} \ {\sf or} \ {\sf exceed} \ {\sf this} \ {\sf criteria} \ {\sf are} \ {\sf considered} \ {\sf exceeding} \ {\sf the} \ {\sf PAL}$

RNA = Remediation by Natural Attenuation (lab and field)

RSL = Regional Screening Level

s.u. = standard units

SL = Screening Level

U = Concentration was not detected above the reported limit

October 2018 Groundwater Sampling Results

Wisconsin Public Service Corporation - Marinette Former MGP, Marinette, Wisconsin

CERCLIS ID -WIN000509952

			Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Inorganic	Inorganic	Inorganic	Organic	RNA	RNA	RNA	RNA	RNA	RNA	RNA
9-digit Code	Station Name	Sample Date	Aluminum, Dissolved	Antimony, Dissolved	Copper, Dissolved	Iron, Dissolved	Manganese, Dissolved	Nickel, Dissolved	Silver, Dissolved	Vanadium, Dissolved	Zinc, Dissolved	Alkalinity, Total	Nitrogen, NO2 + NO3, Total	Sulfate, Total	Methane	Dissolved oxygen	Groundwater, depth to	Oxidation Reduction Potential	pH, Field	Specific Conductance, Field	Temperature, Water	Turbidity, Quantitative
Reporting Units:			μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	mg/L	feet	millivolts	s.u.	μS/cm	Deg C	NTUs
			Result Fla	ag Result Fla	ng Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Fla	g Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag
	WIC	Groundwater SL:	200	6	1,300	NS	300	100	50	30	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
	WI G	roundwater PAL:	<u>40</u>	1.2	130	<u>150</u>	<u>25</u>	<u>20</u>	<u>10</u>	<u>6</u>	<u>2,500</u>	<u>NS</u>	2,000	125,000	<u>NS</u>	<u>NS</u>	<u>NS</u>	<u>NS</u>	<u>NS</u>	<u>NS</u>	<u>NS</u>	<u>NS</u>
		Tap Water RSL:	20,000	7.8	800	14,000	430	390	94	86	6,000	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
400040045	1	40/00/2012	.447			0.470	700	.0.00	.0.20	4.2	42.2	440.000	.05	4.000	0.400	0.40	2.44	02.2	6.60	025.00	45.50	6.20
100918016	MW01R	10/09/2018	< 117 U		1 < 2.2 U	8,170	<u>739</u>	< 0.80 U	< 0.20 U	1.2 J	12.2 J	419,000	< 95 U	1,000 J	8,190	0.12	3.44	-92.2	6.68	825.89	15.56	6.28
100918012	MW03R MW05	10/09/2018	< 117 U		27.8	< 221 U	20.6	2.7 J	< 0.20 U	1.7 J	31.2	309,000	3,700	52,500	32.9	2.29	3.05	77.6	6.91	655.54	16.01	64.39
100818008 100818002	MW302	10/08/2018	< 117 U	_	6.4 J	< 221 U	<u>459</u> < 5.4 U	1.2 J 1.4 J	< 0.20 U	< 0.63 U	< 9.2 U	203,000	<u>3,800</u>	68,600	< 1.4 U	0.12	6.62 12.25	23.4 186.7	7.59 7.02	1938.50 1710.20	14.50 17.43	8.15 2.12
100818002	MW303	10/08/2018 10/08/2018	< 117 C		4.6 J	3,690		3.0	< 0.20 U	1.5 J	15.6 J	279,000 506,000	<u>4,500</u> < 95 U	62,100 34,400	617	0.37	2.56	-97.8	7.02	1938.90	19.15	15.45
100818006 100818004/100818005 (N)	MW304	10/08/2018	<117		< 2.2 U	<u>3,090</u> <u>428</u> J	<u>1,920</u> <u>3,520</u>	3.2	< 0.20 U	1.5 J	10.9 J	446,000	720	59,300	531	0.21	5.60	-97.8	7.23	1409.60	17.01	6.68
100818004/100818003 (N)	MW305	10/08/2018	< 117 C		1 2.4 J	< 221 U	< 5.4 U	1.4 J	< 0.20 U	< 0.63 U	16.6 J	252,000	5,200	83,800	< 1.4 U	0.12	13.98	237.5	7.46	2822.60	15.64	15.60
100918015	MW306	10/09/2018	< 117 C	_		<u>17,100</u>	<u>543</u>	0.85 J	< 0.20 U	2.9	< 9.2 U	479,000	1,700	6,000	504	0.66	3.40	-89.2	6.82	1309.70	15.78	16.82
100918018/100918019 (N)	MW307R	10/09/2018	< 117 C		3.8 J	<u>17,800</u>	<u>172</u>	1.7 J	< 0.20 U	< 0.63 U	13.1 J	260,000	< 95 U	8,400 J	4,850	0.22	2.71	-154.4	7.19	638.82	18.45	13.35
100918010	MW308	10/09/2018	< 117 U	_	1 < 2.2 U	< 221 U	< 5.4 U	< 0.80 U	< 0.20 U	< 0.63 U	16.8 J	673,000	250	398,000	20.3	0.13	4.85	45.0	6.60	8848.41	16.62	2.46
100918020	MW310	10/09/2018	< 117 U	_	I < 2.2 U	16,200	<u>916</u>	< 0.80 U	< 0.20 U	2.1	10 J	566,000	< 95 U	78,700	1,400	0.09	3.82	-126.3	6.92	1474.10	18.02	10.63
100918021	MW311	10/09/2018	< 117 U	_	4.5 J	36,400	<u>968</u>	1.3 J	0.20 J	3.4	16.6 J	810,000	< 95 U	< 5,000 U	8,660	0.11	3.87	-125.4	6.70	3266.90	17.20	10.71
100918017	MW312	10/09/2018	< 117 U	J < 0.30 U	I < 2.2 U	15,400	<u>823</u>	< 0.80 U	< 0.20 U	0.83 J	< 9.2 U	793,000	< 95 U	< 1,000 U	11,200	0.21	1.10	-104.7	6.88	1808.50	16.67	36.87
100818007	MW313	10/08/2018	< 117 l	J < 0.30 U	I < 2.2 U	11,300	719	6.4	< 0.20 U	3.8	12.4 J	437,000	< 95 U	28,700	4,530	0.10	2.50	-122.7	6.99	1128.50	18.10	31.71
100818003	P302	10/08/2018	< 117 l	J < 0.30 U	I < 2.2 U	3,220	<u>536</u>	< 0.80 U	< 0.20 U	1.3 J	10.3 J	272,000	< 95 U	58,100	33.3	0.19	12.37	-78.4	7.26	1,350	15.52	14.11
100918013	P303	10/09/2018	< 117 U	J < 0.30 U	/ < 2.2 U	< 221 U	< 5.4 U	< 0.80 U	< 0.20 U	0.81 J	10.6 J	144,000	290	976,000	< 1.4 U	8.51	31.50	109.3	7.34	2019.50	14.23	63.55
100918014	P304	10/09/2018	< 117 l	J < 0.30 U	< 2.2 U	<u>395</u> J	<u>39.5</u>	1.2 J	< 0.20 U	< 0.63 U	11.6 J	189,000	2,600	625,000	< 1.4 U	101.70	32.54	101.7	7.50	1789.20	13.32	25.76
100918011	P305	10/09/2018	< 117 l	J < 0.30 U	< 2.2 U	<u>2,370</u>	<u>505</u>	0.80 J	< 0.20 U	1.9 J	16.3 J	453,000	< 95 U	12,500	163	0.11	4.99	-76.5	7.00	2060.20	14.45	1.62
	Total Number of Sa	mnles Analyzed	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18
		er of Detections:	0	5	6	12	14	12	1	13	15	18	9	16	13	18	18	18	18	18	18	18
		Min:	0	0.47	2.4	395	20.6	0.8	0.2	0.65	10	144,000	250	1000	20.3	0.09	1.1	-154.4	6.6	638.82	13.32	1.62
	Max			1.6	27.8	36,400	3,520	6.4	0.2	3.8	31.2	810,000	5,200	976,000	11,200	101.7	32.54	237.5	7.59	8,848	19.15	64.39
Number of Samp		Groundwater SL:	200	6	1,300	NS 0	300 11	100	50	30	NS 0	NS 0	NS 0	NS 0	NS 0	NS 0	NS 0	NS 0	NS 0	NS 0	NS 0	NS 0
Number of Samples that Exceed WI Groundwater SL WI Groundwater PAL			40	1.2	130	150	25	20	10	6	2,500	NS NS	2,000	125,000	NS	NS	NS	NS	NS	NS	NS	NS
Number of Sample	Number of Samples that Exceed WI Groundwater PAL			2	0	12	13	0	0	0	0	0	5	3	0	0	0	0	0	0	0	0
	Tap Water RSL			7.8	800	14,000	430	390	94	86	6,000	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Number of S	Samples that Exceed	d Tap Water RSL:	0	0	0	5	11	0	0	0	0	0	0	0	0	0	0	0	0	0 (O:MGP 12/5/201	0 9 C:SGW 12/6/19	OA: MDR 12/7/191
[0:MGP 12/5/2018, C:SGW 12/6/18, QA: MDB 12/7/18]																						

Sorted by 9-digit Code

Analyte concentration exceeds the standard for:

BOID	Groundwater SL
Underline	WI Groundwater PAL
Italic	Tap Water RSL

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BTEX = Benzene, Toluene, Ethylbenzene and Xylene

Deg C = degrees Celsius

J = Concentration Estimated

mg/L = milligrams per liter
MGP = Manufactured Gas Plant

NS = No Standard

NTU = Nephelometric Turbidity Unit

PAH = Polycyclic Aromatic Hydrocarbon

PAL = Preventive Action Limit; results that attain or exceed this criteria are considered exceeding the PAL

RNA = Remediation by Natural Attenuation (lab and field)

RSL = Regional Screening Level

s.u. = standard units

SL = Screening Level

U = Concentration was not detected above the reported limit

OBG | THERE'S A WAY