

November 4, 2016

Ms. Charlene Fitch
Missouri Department of Natural Resources
Division of Environmental Quality
1730 East Elm Street
Jefferson City, Missouri 65101

Re:

2016 Annual Assessment Monitoring Report, Addendum

Bridgeton Landfill, LLC - Bridgeton Landfill

Missouri DNR Permit #MO - 118912

Bridgeton, Missouri

Dear Ms. Fitch:

On behalf of the Bridgeton Landfill, LLC – Bridgeton Landfill, Jett Environmental Consulting is submitting an Addendum to the 2016 Annual Assessment Monitoring Report for the groundwater assessment monitoring program. Additional information has been provided to account for recent sampling results for well PZ-104-KS.

If you have any questions or comments, please contact me at steve.jett@jettenviro.com or 314-496-4654.

Sincerely,

Steve Jett, P.G.

10 Quiet Brook Court

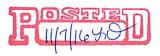
Owner

Attachment:

Annual Assessment Monitoring Report (1 Hardcopy)

CC:

Dana Sincox – Republic Services (1 Hardcopy & PDF via Email)
Mark Milward – Saint Louis County Department of Public Health (PDF via Email)



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2016 ANNUAL ASSESSMENT MONITORING REPORT, ADDENDUM

Bridgeton Landfill, LLC Bridgeton Landfill Bridgeton, Missouri

MO DNR PERMIT No. 118912

November 2016

Prepared by:



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Received NOV 07 2016 SWMP

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1.0 INTRODUCTION

On behalf of the Bridgeton Landfill, LLC - Bridgeton Landfill, Jett Environmental Consulting has prepared this Addendum to the 2016 Annual Assessment Monitoring Report (AAMR) for the facility's groundwater monitoring program. The AAMR was submitted on August 29, 2016. The AAMR was prepared in accordance with the requirements of the December 17, 2013 Assessment Monitoring Plan (AMP) by Herst & Associates, Inc. and the August 18, 2014 response letter to the Missouri Department of Natural Resources (MDNR) Solid Waste Management Program's (SWMP's) July 30, 2014 comments on the AMP. This Addendum includes September 2016 resampling results for well PZ-104-KS.

2.0 ASSESSMENT WELLS AND CONSTITUENTS

The following nine groundwater monitoring wells constitute the facility's assessment monitoring wells:

PZ-104-SS; PZ-209-SS; PZ-210-SS; PZ-211-SS; PZ-104-SD; PZ-209-SD; PZ-210-SD; PZ-211-SD; and PZ-104-KS.

In addition, the following two background groundwater monitoring wells were sampled within the past year in order to complete establishment of data to be used in determining background concentrations for select constituents:

PZ-212-SS; and PZ-212-SD.

p-Cresol;

Appendix A provides a location map of the nine assessment wells and two background wells.

The facility's assessment monitoring constituent list includes 32 constituents. Fifteen of these constituents were specified in the AMP based on groundwater detection monitoring results at PZ-104-SS and PZ-104-SD initially identified in the AMP:

Arsenic, total; Vanadium, total; Ethylbenzene;
Barium, total; 1,2-Dichloroethane; Methyl Ethyl Ketone;
Chromium, total; 4-Methyl-2-pentanone; p-Dichlorobenzene (1,4-);
Cobalt, total; Acetone; Toluene; and
Nickel, total; Benzene; Xylenes, total.

During the first assessment event in September 2014, the assessment wells were sampled for the constituents listed in Title 10 of the Missouri Code of State Regulation (CSR) 80-3 Appendix II. Six of the Appendix II list of assessment monitoring constituents that were detected in PZ-104-SS and/or PZ-104-SD in September 2014 had not previously been detected in May 2012, November 2012, and/or April 2013. These six constituents were thereafter added to the assessment constituent list:

Beryllium, total; Copper, total; Selenium, total; and Cadmium, total; Lead, total; Zinc, total.

Four of the Appendix II constituents that were detected in PZ-104-SS and/or PZ-104-SD in September 2014 had not previously been analyzed in wells PZ-104-SS or PZ-104-SD in May 2012, November 2012, or April 2013. These four constituents were thereafter also added to the assessment constituent list:

Polychlorinated Biphenyl Aroclor 1221 (PCB-1221).

Sulfide; Phenol; and

Seven additional constituents are not included in 10 CSR 80-3, but were specified by the SWMP in its July 30, 2014 letter to be included in the Bridgeton Landfill assessment monitoring program based on the results of SWMP split sampling of PZ-104-SD in November 2012:

1,2,4-Trimethylbenzene;

Isopropylbenzene;

Tetrahydrofuran.

1,3,5-Trimethylbenzene;

Methyl-tert-butyl Ether;

1-Chlorobutane:

p-Isopropyltoluene; and

3.0 CURRENT GROUNDWATER CONDITIONS

In accordance with the AMP, this section presents an update of the annual evaluation of current groundwater conditions, based on the past year of assessment monitoring results and recent sampling of well PZ-104-KS conducted on September 7, 2016. Well PZ-104-KS was resampled in September 2016 for select organic compounds that were initially detected during the second quarter 2016 event. This updated evaluation includes the concentrations, extents, and migration rates of the assessment constituents verified.

In addition, during the site's routine third quarter 2016 Detection Monitoring event, wells PZ-104-SD and PZ-104-SS were sampled. As shown in **Appendix B**, no new detections were exhibited during the third quarter 2016 event at wells PZ-104-SD and PZ-104-SS. Concentrations reported at PZ-104-SD and PZ-104-SS were consistent with those reported over the last year and within the AAMR.

Each of the organic compounds initially detected at PZ-104-KS during the second quarter 2016 event were confirmed as non-detect during the September 2016 resampling event. Therefore, **Sections 3.1**, **3.2**, and **3.3** have been updated below to reflect available data.

3.1 Concentrations of Assessment Constituents and SWMP-Specified Non-10 CSR 80-3 Constituents

Appendix B summarizes the concentrations of the assessment constituents and SWMP-specified non-10 CSR 80-3 constituents from third quarter 2015 through third quarter 2016 (PZ-104-SD, PZ-104-SS, PZ-104-KS).

In general, assessment constituent concentrations and SWMP-specified non-10 CSR 80-3 constituent concentrations have decreased or remained stable over the past year. The majority of constituents that were not detected in second quarter 2015 remain below RLs as of third quarter 2016.

As of third quarter 2016, the GWPS exceedances for organic assessment constituents at the assessment wells are as follows:

- Benzene at PZ-104-SS (221 ug/L, MCL-based GWPS of 5 ug/L)
- Benzene at PZ-104-SD (451 ug/L, MCL-based GWPS of 5 ug/L); &
- Methyl-tert-butyl ether at PZ-104-SD (5.2 ug/L, RL-based GWPS of 5 ug/L).

Benzene concentrations at PZ-104-SS have decreased 77% in the past year, from 935 ug/L in second quarter 2015 to 221 ug/L as of third quarter 2016. Benzene concentrations at PZ-104-SD have decreased 33% in the past year, from 672 ug/L in second quarter 2015 to 451 ug/L as of third quarter 2016. The second quarter 2016 detection of methyl-tert-butyl ether (MTBE) at PZ-104-SD was the second detection at this well. MTBE was not required to be sampled during the third quarter 2016 event.

The second quarter 2016 detections of benzene and p-isopropyltoluene at PZ-104-KS were both initial detections. Well PZ-104-KS was resampled on July 25, 2016 to verify the initial second quarter 2016 detections. Both benzene at PZ-104-KS (12.1 ug/L) and p-isopropyltoluene (12.2

ug/L) were confirmed detected during the July 2016 resampling event. During the third quarter 2016 (September 7, 2016) event at PZ-104-KS, benzene was reported as non-detect (<5 ug/L) and p-isopropyltoluene was reported as non-detect (<5 ug/L).

In the past year, the facility has implemented several measures to enhance the removal of leachate and landfill gas from the waste mass.

- Enhancement of leachate management and acquisition from self-expressing well heads, thereby reducing pressure on well heads and evacuating additional liquid.
- Expansion of the landfill gas collection system, thereby enhancing the collection of gas and reducing intra-well pressure.
- Addition of soils in areas of high differential settlement to enhance drainage, thereby preventing precipitation from percolating through the waste mass in the south quarry.

By removing leachate and gas that may be acting as a source of groundwater impacts in the vicinity of the assessment wells, the interim corrective measures are believed to be reducing constituent concentrations.

3.2 Extents of Assessment Constituents and SWMP-Specified Non-10 CSR 80-3 Constituents

PZ-104-SS and PZ-104-SD are the only wells with confirmed organic GWPS exceedances through third quarter 2016; therefore the extent of confirmed organic GWPS exceedances has not expanded outside of the PZ-104-SS/SD well cluster. In general, the extents of the assessment and SWMP-specified non-10 CSR 80-3 constituent exceedances have decreased or stabilized over the past year, with the exception of sulfide. None of the assessment constituents exhibited an overall expansion of their exceeding area extents in the past year.

Sulfide was the only inorganic constituent that exhibited a GWPS exceedance outside of the PZ-104 well cluster. However the first quarter 2016 trace level sulfide detections at PZ-104-SS, PZ-209-SD, and PZ-211-SD were only slightly above the laboratory RL and were the first sulfide detections at these wells since September 2014.

The vertical extent of the benzene exceedances has not expanded in the past year and continues to only encompass wells PZ-104-SS and PZ-104-SD. Benzene concentrations have decreased significantly at PZ-104-SS and PZ-104-SD over the past year as noted in **Section 3.1**.

3.3 Migration Rates of Assessment Constituents and SWMP-Specified Non-10 CSR 80-3 Constituents

The majority of assessment constituents and SWMP-specified non-10 CSR 80-3 constituents either do not exhibit GWPS exceedances as of third quarter 2016, or the extent of the GWPS exceedances has remained stable. Accordingly, migration rates for these constituents cannot be evaluated at the present time.

Only one constituent exhibited both an exceedance of a GWPS as of third quarter 2016 <u>and</u> an expansion of the extent of exceedances between second quarter 2015 and third quarter 2016: sulfide.

<u>Sulfide</u>

The extent of sulfide GWPS exceedances may have expanded slightly in the past year such that it now encompasses wells PZ-104-SS, PZ-209-SD, and PZ-211-SD. Sulfide was reported as non-detect at each well a year ago (second quarter 2015 event). However, the laboratory reporting limit for sulfide has fluctuated over the last year (1, 2, 5, and 10 mg/L) due to laboratory dilution factors. Therefore, since the second quarter 2016 sulfide detections are below the laboratory reporting limit

utilized during the second quarter 2015 event, a true estimate on the changes of sulfide over the last year is not possible. During the second quarter 2016 event, sulfide was reported as non-detect at adjacent clustered wells PZ-104-SD, PZ-104-KS, PZ-209-SS, and PZ-211-SD.

In general, because the assessment well area has historically been regarded as hydrogeologically upgradient of the Bridgeton Landfill, migration of constituents via advective-dispersive transport away from the waste mass and towards the assessment monitoring wells is not believed to be likely.

3.4 Summary of Current Conditions

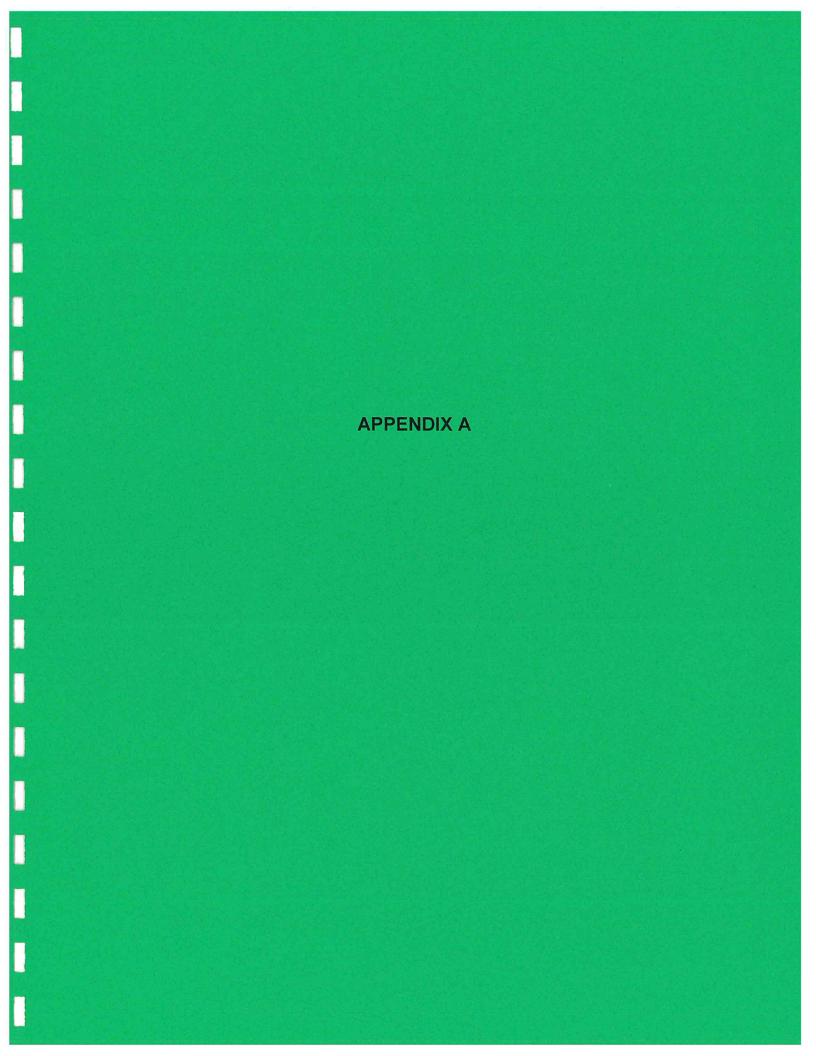
In general, the assessment monitoring results indicate that the confirmed groundwater impacts in the vicinity of the assessment wells have remained stable or improved in the past year. PZ-104-SS and PZ-104-SD are the only wells with confirmed organic GWPS exceedances; therefore the extent of confirmed organic GWPS exceedances has not expanded outside of PZ-104-SS/SD well cluster. There were no confirmed constituents exceeding GWPSs that exhibited an overall expansion of their horizontal extents in the past year. Sulfide is the only inorganic constituent that exhibited a GWPS exceedance outside of the PZ-104 well cluster. However the trace level sulfide detections at PZ-104-SS, PZ-209-SD, and PZ-211-SD are only slightly above the laboratory RL and each were diluted (ranging from 2x to 10x) by the laboratory during the second quarter 2016 event. The second quarter 2016 sulfide detections are the first detections since September 2014.

In general, the reductions in constituent concentrations observed in the past year at the assessment monitoring wells are believed to be attributable in part to the aggressive pursuit of interim corrective measures at the facility, as described in **Section 3.1** above.

4.0 RECOMMENDATIONS

In accordance with 10 CSR 80-3.010(11)(C)6.I(III), the facility will continue with semi-annual assessment monitoring as described in the AMP.

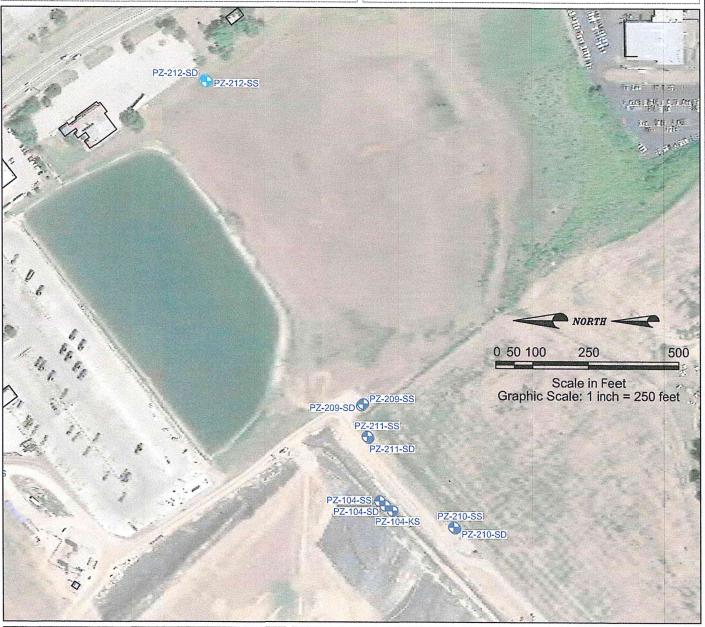
Potential remedial alternatives to address the groundwater quality issues at wells PZ-104-SS and PZ-104-SD were discussed and evaluated in a February 19, 2016 Assessment of Corrective Measures Report Addendum by Feezor Engineering, Inc.





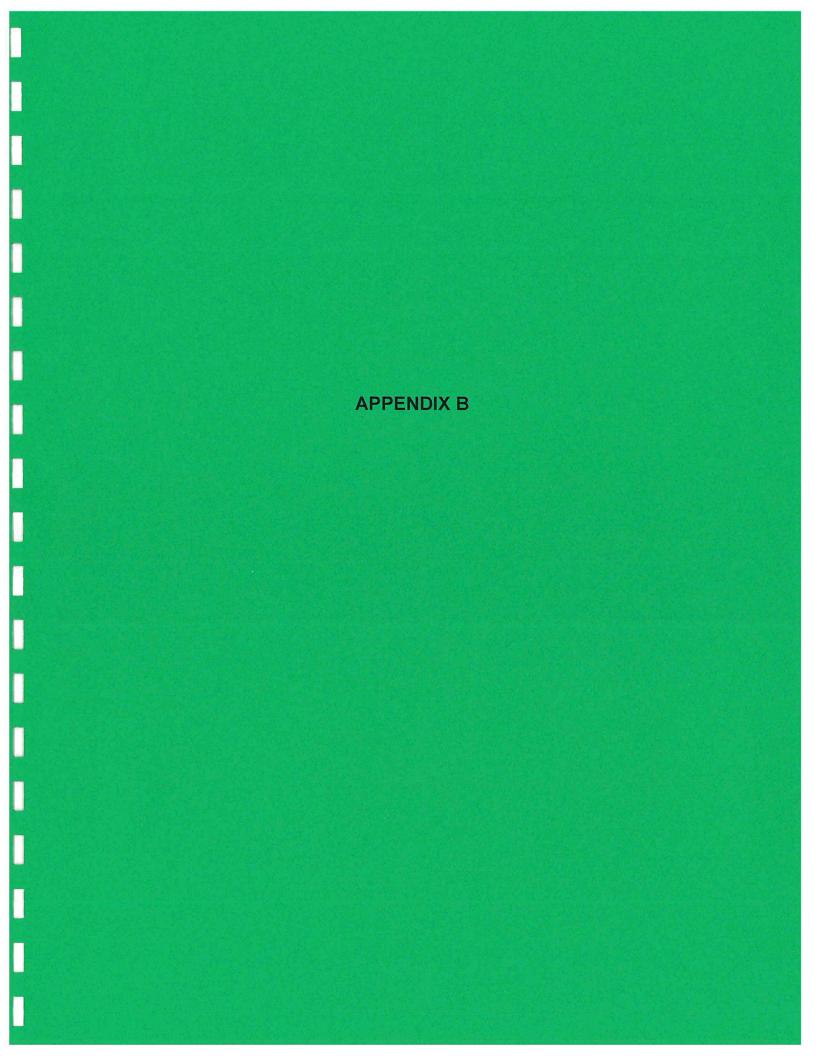
LEGEND

- Assessment Groundwater Monitoring Well
- Background Groundwater Monitoring Well





10 Quiet Brook Court St. Charles, MO 63303 314-496-4654 www.jettenviro.com Figure 1: Assessment Monitoring Wells Bridgeton Landfill, LLC Bridgeton, Missouri



Groundwater Monitoring Results for Assessment Constituents Bridgeton Landfill, LLC Bridgeton Landfill

		Bridge	eton La	PZ-104-SS	PZ-104-SS	PZ-104-SS	D7 404 CC	PZ-104-SS
Constituent	Units	Constituent Type	GWPS	08/25/15	11/18/15	3/1/2016	PZ-104-SS 06/03/16	08/24/16
Inorganic Constituents				06/25/15	11/10/15	3/1/2016	06/03/16	08/24/16
Arsenic, Total	ug/L	Initially Identified Assessment	11	<5	<10	<5	<5	<5.0
Barium, Total	ug/L	Initially Identified Assessment	2,000	95.6	106	98.2	102	102
Beryllium, Total	ug/L	New App II, Not Prev. Detected	4	<2	<4	<2	<2	<2.0
Cadmium, Total	ug/L	New App II, Not Prev. Detected	5	<0.2	<2	<0.20	<0.2	<0.20
Chromium, Total	ug/L	Initially Identified Assessment	100	<5	<10	<5	<5	<5.0
Cobalt, Total	ug/L	Initially Identified Assessment	RL	<5	<5	<5	<5	<5.0
Copper, Total	ug/L	New App II, Not Prev. Detected	1,300	<5	<10	<5	<5	<5.0
Lead, Total	ug/L	New App II, Not Prev. Detected	15	<5	<10	<5	<5	<5.0
Nickel, Total	ug/L	Initially Identified Assessment	23	<10	<10	<10	<10	<10.0
Selenium, Total	ug/L	New App II, Not Prev. Detected	50	<5	<10	<5	<5	<5.0
Sulfide	mg/L	New App II, Not Prev. Analyzed	RL	NR	<1	NR	4.9	NR
Vanadium, Total	ug/L	Initially Identified Assessment	RL	<10	<10	<10	<10	<10.0
Zinc, Total	ug/L	New App II, Not Prev. Detected	220	<20	<20	<20	<20	<20.0
Organic Constituents		• • • • • • • • • • • • • • • • • • • •						
1,2,4-Trimethylbenzene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
1,2-Dichloroethane	ug/L	Initially Identified Assessment	5	<5	<5	<5	<5	<5.0
1,3,5-Trimethylbenzene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
1,4-Dichlorobenzene	ug/L	Initially Identified Assessment	75	<5	<5	<5	5.8	9
1-Chlorobutane	ug/L	Non-App II from MDNR Split	RL	<5	<5	<5	<5	NR
4-Methyl-2-pentanone	ug/L	Initially Identified Assessment	RL	<10	<10	<10	<10	NR
Acetone	ug/L	Initially Identified Assessment	RL	<10	<10	<10	<10	<10.0
Benzene	ug/L	Initially Identified Assessment	5	357	469	8.3	44.1	221
Ethylbenzene	ug/L	Initially Identified Assessment	700	13.2	8.7	<5	<5	7.8
Isopropylbenzene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
Methyl Ethyl Ketone	ug/L	Initially Identified Assessment	RL	<10	<10	<10	<10	<10.0
Methyl-tert-butyl Ether	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
PCB Aroclor 1221	ug/L	New App II, Not Prev. Analyzed	0.5	NR	<0.2	NR	<0.2	NR
p-Cresol*	ug/L	New App II, Not Prev. Analyzed	RL	NR	<10	<10	<10	NR
Phenol	ug/L	New App II, Not Prev. Analyzed	RL	NR	<10	<10	<10	NR
p-Isopropyltoluene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
Tetrahydrofuran	ug/L	Non-App II from MDNR Split	RL	NR	<100	NR	<100	NR
Toluene	ug/L	Initially Identified Assessment	1,000	14.7	5.2	<5	5.7	17.1
Xylenes, Total	ug/L	Initially Identified Assessment	10,000	21.2	23.1	15.4	8.7	22.1

Notes:

RL: Laboratory Reporting Limit.

NR: Not required to be analyzed this event.

Constituent concentration exceeds GWPS (where established) or MCL.

^{*} Samples not analyzed for p-cresol individually. Reported result is for m+p-cresols.

Groundwater Monitoring Results for Assessment Constituents Bridgeton Landfill, LLC **Bridgeton Landfill**

C	Units	Constituent Type	GWPS	PZ-104-SD	PZ-104-SD	PZ-104-SD	PZ-104-SD	PZ-104-SD
Constituent				08/25/15	11/18/15	3/1/2016	06/03/16	08/24/16
Inorganic Constituents								
Arsenic, Total	ug/L	Initially Identified Assessment	10	12.4	22.5	16.7	19.3	17.9
Barium, Total	ug/L	Initially Identified Assessment	2,000	491	553	609	848	628
Beryllium, Total	ug/L	New App II, Not Prev. Detected	27.5	<2	<4	<2	<2	<2.0
Cadmium, Total	ug/L	New App II, Not Prev. Detected	67.2	<0.2	<2	<0.20	<0.2	<0.20
Chromium, Total	ug/L	Initially Identified Assessment	100	16.1	14.7	17.8	21.2	16.9
Cobalt, Total	ug/L	Initially Identified Assessment	RL	<5	<5	<5	<5	<5.0
Copper, Total	ug/L	New App II, Not Prev. Detected	1,300	<5	<10	<5	<5	5.1
Lead, Total	ug/L	New App II, Not Prev. Detected	250	<5	<10	<5	<5	<5.0
Nickel, Total	ug/L	Initially Identified Assessment	RL	48	64	64.4	83.8	70.1
Selenium, Total	ug/L	New App II, Not Prev. Detected	50	<5	<10	<5	<5	<5.0
Sulfide	mg/L	New App II, Not Prev. Analyzed	RL	NR	<1	NR	<1	NR
Vanadium, Total	ug/L	Initially Identified Assessment	RL	15.3	16.8	16.6	16.9	17.5
Zinc, Total	ug/L	New App II, Not Prev. Detected	2950	27.1	<20	<20	<20	<20.0
Organic Constituents				_				
1,2,4-Trimethylbenzene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
1,2-Dichloroethane	ug/L	Initially Identified Assessment	5	<5	<5	<5	<5	<5.0
1,3,5-Trimethylbenzene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
1,4-Dichlorobenzene	ug/L	Initially Identified Assessment	75	<5	<5	<5	<5	8.9
1-Chlorobutane	ug/L	Non-App II from MDNR Split	RL	<5	<5	<50	<5	NR
4-Methyl-2-pentanone	ug/L	Initially Identified Assessment	RL	<10	<10	<10	<10	NR
Acetone	ug/L	Initially Identified Assessment	RL	109	<10	<10	<10	<10.0
Benzene	ug/L	Initially Identified Assessment	5	564	640	426	554	451
Ethylbenzene	ug/L	Initially Identified Assessment	700	7.3	5.4	<5	<5	7.3
Isopropylbenzene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
Methyl Ethyl Ketone	ug/L	Initially Identified Assessment	RL	70.9	<10	<10	<10	<10.0
Methyl-tert-butyl Ether	ug/L	Non-App II from MDNR Split	RL	NR	5.4	NR	5.2	NR
PCB Aroclor 1221	ug/L	New App II, Not Prev. Analyzed	0.5	NR	<0.2	NR	<0.2	NR
p-Cresol*	ug/L	New App II, Not Prev. Analyzed	RL	NR	67.6	<10	<10	NR
Phenol	ug/L	New App II, Not Prev. Analyzed	RL	NR	<10	<10	<10	NR
p-Isopropyltoluene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
Tetrahydrofuran	ug/L	Non-App II from MDNR Split	RL	NR	1560	NR	<1000	NR
Toluene	ug/L	Initially Identified Assessment	1,000	84.3	10.5	9.6	8.5	9.3
Xylenes, Total	ug/L	Initially Identified Assessment	10,000	22	19.1	19.3	24.4	33.7

Notes:

RL: Laboratory Reporting Limit.

NR: Not required to be analyzed this event.

* Samples not analyzed for p-cresol individually. Reported result is for m+p-cresols.

Constituent concentration exceeds GWPS (where established) or MCL.

Groundwater Monitoring Results for Assessment Constituents Bridgeton Landfill, LLC

Bridgeton Landfill

0 0 1		Constituent Type	GWPS	PZ-104-KS	PZ-104-KS	PZ-104-KS	PZ-104-KS	PZ-104-KS
Constituent	Units			08/25/15	11/18/15	3/9/2016	06/10/16	09/07/16
Inorganic Constituents				34,440,00,000,000,000				
Arsenic, Total	ug/L	Initially Identified Assessment	10	NR	<10	NR	<5	NR
Barium, Total	ug/L	Initially Idéntified Assessment	2,000	NR	100	NR	92.8	NR
Beryllium, Total	ug/L	New App II, Not Prev. Detected	27.5	NR	<4	NR	<2	NR
Cadmium, Total	ug/L	New App II, Not Prev. Detected	67.2	NR	<2	NR	<0.2	NR
Chromium, Total	ug/L	Initially Identified Assessment	100	NR	<10	NR	<5	NR
Cobalt, Total	ug/L	Initially Identified Assessment	RL	NR	<5	NR	<5	NR
Copper, Total	ug/L	New App II, Not Prev. Detected	1,300	NR	<10	NR	<5	NR
Lead, Total	ug/L	New App II, Not Prev. Detected	250	NR	<10	NR	<5	NR
Nickel, Total	ug/L	Initially Identified Assessment	RL	NR	<10	NR	<10	NR
Selenium, Total	ug/L	New App II, Not Prev. Detected	50	NR	<10	NR	<5	NR
Sulfide	mg/L	New App II, Not Prev. Analyzed	RL	NR	<5	NR	<1	NR
Vanadium, Total	ug/L	Initially Identified Assessment	RL	NR	<10	NR	<10	NR
Zinc, Total	ug/L	New App II, Not Prev. Detected	2950	NR	<20	NR	<20	NR
Organic Constituents		· · · · · · · · · · · · · · · · · · ·				_	_	
1,2,4-Trimethylbenzene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
1,2-Dichloroethane	ug/L	Initially Identified Assessment	5	NR	<5	NR	<5	NR
1,3,5-Trimethylbenzene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
1,4-Dichlorobenzene	ug/L	Initially Identified Assessment	75	NR	<5	NR	<5	NR
1-Chlorobutane	ug/L	Non-App II from MDNR Split	RL	<5	<5	<5	<5	NR
4-Methyl-2-pentanone	ug/L	Initially Identified Assessment	RL	NR	<10	NR	<10	NR
Acetone	ug/L	Initially Identified Assessment	RL	NR	<10	NR	<10	NR
Benzene	ug/L	Initially Identified Assessment	5	NR	<5	NR	5.8 / 12.1	<5
Ethylbenzene	ug/L	Initially Identified Assessment	700	NR	<5	NR	<5	NR
Isopropylbenzene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
Methyl Ethyl Ketone	ug/L	Initially Identified Assessment	RL	NR	<10	NR	<10	NR
Methyl-tert-butyl Ether	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	<5	NR
PCB Aroclor 1221	ug/L	New App II, Not Prev. Analyzed	0.5	NR	<0.2	NR	<0.2	NR
p-Cresol*	ug/L	New App II, Not Prev. Analyzed	RL	NR	<10	NR	<10	NR
Phenol	ug/L	New App II, Not Prev. Analyzed	RL	NR	<10	NR	<10	NR
p-Isopropyltoluene	ug/L	Non-App II from MDNR Split	RL	NR	<5	NR	5.7 / 12.2	<5
Tetrahydrofuran	ug/L	Non-App II from MDNR Split	RL	NR	<100	NR	<100	<100
Toluene	ug/L	Initially Identified Assessment	1,000	NR	<5	NR	<5	NR
Xylenes, Total	ug/L	Initially Identified Assessment	10,000	NR	<5	NR	6.7 / 7.6	<5

Notes:

RL: Laboratory Reporting Limit.

NR: Not required to be analyzed this event.

Second set of results for benzene, p-isopropyltoluene, and xylenes (total) represents verification sampling on 7/25/16.

Constituent concertration exceeds GWPS (where established) or MCL.

^{*} Samples not analyzed for p-cresol individually. Reported result is for m+p-cresols.