#### FIFTH FIVE-YEAR REVIEW REPORT FOR CRAIG FARM DRUM SUPERFUND SITE ARMSTRONG COUNTY, PENNSYLVANIA



Prepared by

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Date

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## LIST OF ABBREVIATIONS & ACRONYMS

BCACS	Bear Creek Area Chemical Site
BMDSA	Benzene Meta Disulfonic Acid
BSA	Benzene Sulfonic Acid
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	Contaminant of Concern
EPA	United States Environmental Protection Agency
ESD	Explanation of Significant Differences
FFS	Focused Feasibility Study
FYR	Five-Year Review
GPRA	Government Performance Results Act
ICs	Institutional Controls
MCL	Maximum Contaminant Level
MSC	Medium Specific Concentration
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
O&M	Operation and Maintenance
OU	Operable Unit
PADEP	Pennsylvania Department of Environmental Protection
p-PSA	Para-Phenolsulfonic Acid
PRP	Potentially Responsible Party
RAO	Remedial Action Objectives
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation and Feasibility Study
ROD	Record of Decision
SHS	State-Wide Health Standard
THD	Trihydroxydiphenyl
μg/L	Micrograms per liter

## I. INTRODUCTION

The purpose of a Five-Year Review (FYR) is to evaluate the implementation and performance of a remedy in order to determine if the remedy is and will continue to be protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in five-year review reports such as this one. In addition, FYR reports identify issues found during the review, if any, and document recommendations to address them.

The U.S. Environmental Protection Agency (EPA) is preparing this five-year review pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121, consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 Code of Federal Regulations Section 300.430(f)(4)(ii)), and considering EPA policy.

This is the fifth FYR for the Craig Farm Drum Superfund Site (the Site). The triggering action for this statutory review is the completion date of the previous FYR. The FYR has been prepared due to the fact that hazardous substances, pollutants, or contaminants remain at the site above levels that allow for unlimited use and unrestricted exposure.

The Site consists of three operable units (OUs). This FYR includes a review of OU-1 that addresses resorcinol residue material in the former disposal pits and soils contaminated with resorcinol and OU-3 that addresses two contaminated seeps, identified as Seeps A and B, located downgradient of the former disposal pits. The FYR does not include a review of OU-2 that addressed temporary stockpiled clean soils because no remedial action was conducted on this OU.

#### Site Background

The Site consists of approximately 117 acres located in Parker, Armstrong County, Pennsylvania about two miles east of the Borough of Petrolia and four miles south of the Allegheny River (Figure 1). Land use surrounding the Site is agricultural and limited residential. Currently, the Site is undeveloped and consists of the components of the remedy including a landfill, seep interceptor system, impermeable cap, and drainage swales.

From 1958 through 1963, drums containing still bottoms from resorcinol production at the nearby Koppers Chemical Company, Inc. (Koppers) facility were disposed in two abandoned strip mining pits. Koppers, now Beazer East, Inc. (Beazer), was identified as the Potentially Responsible Party (PRP) for the Site.

The Site is located within the Bear Creek Area Chemical Site (BCACS). The BCACS consists of multiple sites that are impacted by contaminants primarily related to resorcinol manufacturing and are being addressed by either EPA or Pennsylvania Department of Environmental Protection (PADEP). As a result, residents within the BCACS are connected to public water.

Surface water is present at the Site in the form of ditches, forested wetlands, and an unnamed creek. The unnamed creek flows from the northwest to southeast of the Site. Groundwater is present at the Site in the unconsolidated materials and generally flows to the west-southwest toward the unnamed creek.



## FIVE-YEAR REVIEW SUMMARY FORM

SITE IDENTIFICATION						
Site Name: Craig Farm Drum						
EPA ID: PAD98050852	7					
Region: 3	State: PA	City/County: Parker / Armstrong				
	:	SITE STATUS				
NPL Status: Deleted						
<b>Multiple OUs?</b> Yes	Has the Yes	he site achieved construction completion?				
	RI	EVIEW STATUS				
Lead agency: EPA						
Author name (Federal o	or State Project M	anager): Aaron Mroz				
Author affiliation: Rem	edial Project Mana	ger				
Review period: 11/14/20	017 - 4/7/2019					
Date of site inspection:	6/12/2018					
Type of review: Statutory						
<b>Review number:</b> 5						
Triggering action date:	4/7/2014					
Due date (five years afte	r triggering action	<i>date</i> ): 4/7/2019				

## **II. RESPONSE ACTION SUMMARY**

## **Basis for Taking Action**

EPA first discovered the contamination at the Site during an inspection in December 1980. As a result of drum disposal, soil, surface water, and groundwater were impacted by compounds, primarily resorcinol and related polymers. Approximately 2,500 tons of material had been placed in the disposal pits. Resorcinol is an organic compound used as an adhesive enhancer in the production of automobile tires and in pharmaceuticals. The Site was added to the National Priorities List (NPL) on September 8, 1983.

EPA performed an environmental assessment in 1983 and installed test pits in 1984 in the vicinity of the disposal pits to determine the extent and condition of the drums containing still-bottom residue. The investigation indicated that the majority of the drums were crushed, broken, or without lids.

The Remedial Investigation and Feasibility Study (RI/FS) was conducted from February 1986 through November 1987 to evaluate the nature and extent of contamination. The biological survey conducted during the RI/FS indicated that macroinvertebrate communities located downstream from the Site in the unnamed creek were stressed due to Site-related compounds.

Based on the analysis of groundwater, surface water, sediments during the RI/FS and then refined during a Groundwater Verification Study, the following compounds have been identified as Contaminants of Concern (COCs):

- Resorcinol
- Trihydroxydiphenyl (THD)
- Para-phenolsulfonic acid (p-PSA)
- Benzene sulfonic acid (BSA)
- Benzene meta disulfonic acid (BMDSA)
- Benzene

## **Response Actions**

EPA issued the Record of Decision (ROD) for the Site on September 29, 1989. The remedy was based on the Site's impact on the environment rather than on a risk to human health. The following Remedial Action Objectives (RAOs) were identified:

- Minimize risk to public health and the environment from direct contact with contaminated material;
- Control the migration of contaminants into nearby surface waters;
- Control the migration of contaminants into groundwater.

In order to meet the RAOs, the remedy selected in the ROD consisted of the following components:

- Excavation of approximately 32,000 cubic yards of material from the disposal pits and surrounding areas;
- Onsite solidification of excavated material;
- Placement of the solidified material in an onsite Resource Conservation and Recovery Act (RCRA) equivalent, double lined, fenced landfill (referred to as the Onsite Disposal Unit);
- Wetland delineation and subsequent construction of a one-acre onsite wetland to replace wetlands destroyed in construction of the onsite landfill;
- Implementation of institutional controls (ICs);
- Passive collection of groundwater using a seep interceptor system with offsite treatment;
- Monitoring of both onsite and offsite groundwater and surface water; and
- Groundwater Verification Study.

The Groundwater Verification Study and wetland delineation were performed during the remedial design. Based on the results of the Groundwater Verification Study no additional groundwater remediation was required. The ROD also stated that the timeframe for the collection of groundwater would be based on bioassay testing and the bioassay testing procedure would be approved by EPA.

Because of the anticipated closure of the local PRP-owned disposal facility to which collected groundwater was transported, a Focused Feasibility Study (FFS) was completed in 2009. Capping of the Former North Pit was recommended in order to reduce surface water infiltration and thus limit the amount of leachate from Seep A. Included in the FFS were the results of bioassay testing from Seep A and B that indicated collection from Seep B was no longer required. EPA modified the remedy in an Explanation of Significant Differences (ESD) dated September 18, 2009 and consisted of the following components:

- Installation of an impermeable cap on the 3-acre, former north pit area to reduce infiltration of clean water through north pit materials (referred to as the Cap Area);
- Excavation/fill of existing ground surface in vicinity of former north pit to required grade;
- Installation of bio swales or other infiltration features to direct clean surface water flow from the capped area;

- Installation of groundwater infiltration system into deep bedrock upgradient of the former north pit to prevent upgradient groundwater from flowing through north pit materials if it is determined feasible during a preliminary design investigation;
- Continued maintenance of the Seep A collection trench, piping, and storage tank to collect contaminated overburden groundwater;
- Treatment of collected Seep A water at an alternative offsite treatment facility; and
- The Seep B collection trench would remain in place but valves would be closed so that the system no longer collected water.

The ESD also clarified that institutional controls are required as part of the selected remedy because the ROD only required institutional controls in the declaration portion of the ROD and not in the remedy selection portion of the ROD. The installation of a groundwater infiltration system into deep bedrock upgradient of the former north pit to prevent upgradient groundwater from flowing through the north pit materials was not completed because the preliminary design investigation determined it would not be feasible.

### **Status of Implementation**

From May 1994 through December 1995, the waste material was excavated from the former north and south disposal pits, then solidified and placed in the Onsite Disposal Unit. A wetland area was constructed southeast of the Onsite Disposal Unit. To collect the groundwater from Seep A and Seep B a seep interceptor system was constructed. The seep interceptor system is comprised of collection trenches that contain perforated pipe buried in gravel that collects the groundwater and gravity feeds it to an above ground storage tank via a solid conveyance pipe.

The collection of groundwater from Seep A continues while collection from Seep B stopped in 2010. Also, in 2010, the Cap Area and bio swale were installed. The Cap Area is constructed of two feet of vegetated clean fill that overlays three sythenic membranes. The purpose of the bioswale is to collect surface runoff from Cap Area. All the components of the remedy are included on Figure 2. The Cap Area and stopping collection from Seep B has reduced the amount of groundwater collected for offsite treatment by approximately 80 percent.

## Figure 2: Site Layout



## **Institutional Controls**

As required in the ROD and ESD, institutional controls have been implemented in the form of a deed restriction on the property. The deed restriction is summarized in Table 1. Historically, groundwater at the Site and immediately adjacent to the Site has not been used for drinking water or irrigation purposes due to poor water quality from historic mining operations. Onsite groundwater use is restricted by institutional controls and is restricted in the surrounding area due to the Site's location within the BCACS. PADEP constructed a public water supply to serve the BCACS between 2003 and 2007 and also required communities therein to implement a model ordinance prohibiting the use of groundwater wells for potable water and to required property owners to connect to the public water system. All known residents within the vicinity of the Site are currently connected to the system.

Media	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date
Soil and Groundwater	Yes	Yes	Sitewide	Restricts extraction or use of groundwater Prohibits constructing any structure that would disturb the cap Prohibits the Site from being used for the purposes of living, dwelling, or overnight accommodations of any type Restricts action that will interfere with, obstruct, or disturb the performance of any remedial response, including O&M Requires any Site owner to provide any purchaser with notice of the terms of the Consent Decree prior to transferring any interest in the Site	Declaration of Restrictions (September 2004)

 Table 1: Summary of Implemented ICs

Based on completion of the response actions, EPA determined that the Site was eligible for deletion from the NPL. PADEP concurred with the deletion on May 1, 2013 and the Site was deleted from the NPL on September 30, 2013.

## Systems Operations/Operation & Maintenance (O&M)

The O&M Plan was revised in 2013. The PRP performs the O&M activities which consist of an annual inspection, leachate collection, annual groundwater elevation gauging, groundwater and surface water sampling conducted every five years in support of the upcoming five-year review, off-site treatment of leachate collected in

the above ground storage tank as needed and monthly tank inspections. O&M activities are summarized in a report which is submitted to the EPA and PADEP.

From 2014 to 2017 the average flow rate of groundwater collected from Seep A has been approximately 734,000 gallons per year. The collection rate has been generally consistent since the Cap Area was installed and collection from Seep B was stopped. Leachate is also collected from the Onsite Disposal Unit at a rate of approximately 29,000 gallons per year from 2014 to 2017. Before the Cap Area installation, the groundwater collection rate was approximately 3,600,000 gallons per year.

## **III. PROGRESS SINCE THE LAST REVIEW**

This section includes the protectiveness determinations and statements from the **last** five-year review as well as the recommendations from the **last** five-year review and the current status of those recommendations.

OU #	Protectiveness Determination	Protectiveness Statement
1	Protective	The remedy for OU-1 – Disposal Pits is protective of
		human health and the environment in both the short and
		long term due to excavation of contaminated material
		from the disposal pits, onsite solidification of the
		material, and placement of the material in the onsite
		landfill. Institutional controls have been implemented
		providing notice that hazardous substances are present at
		the Site, prohibiting disturbance of the landfill and
		restricting use of the Site.
3	Protective	The Remedy for OU-3 – Contaminated Seeps is
		protective of human health and the environment in both
		the short and long term due to the installation of the seep
		interceptor system with offsite treatment and installation
		of the Seep A Cap. Additionally, protection of human
		health is enhanced due to the location of the Site within
		the BCACS, in which all residents are required to
		connect to public water. Institutional controls have been
		implemented restricting groundwater use at the Site.
Sitewide	Protective	The Site-wide remedy at the Site is protective of human
		health and the environment in the short and long term.
		The Site has achieved Site Completion and has been
		deleted from the NPL. Construction of the remedy at the
		Site has been completed in accordance with the 1989
		ROD and 2009 ESD, institutional controls are in place,
		and O&M is being conducted in accordance with the
		O&M Plan. All RAOs, performance standards, and
		cleanup goals established in the 1989 ROD have been
		achieved. No further Superfund response, other than
		operation, maintenance, and Five-Year Reviews, is
		necessary to protect human health and the environment.

Table 2: Protectiveness Determinations/Statements from the 2014 FYR

OU #	Issue	Recommendations	Current Status	Current Implementation	Completion Date (if
				<b>Status Description</b>	applicable)
Sitewide	Onsite rain gauge damaged and	Repair or replace onsite rain gauge.	Completed	Rain gauge replaced.	5/16/2014
	functional.				

Table 3: Status of Recommendations from the 2014 FYR

## **IV. FIVE-YEAR REVIEW PROCESS**

## **Community Notification, Involvement & Site Interviews**

A public notice was published in the Butler Eagle newspaper on Febraury 22, 2018. The public notice explained the FYR process, contained the expected completion date of the FYR, provided point of contact information for EPA, and identified the location of the information repositories for the Site. No questions or comments were received as a result of the public notice. The public notice is included as Attachment A.

## Data Review

Since the fourth five-year review was completed, samples were collected in March of 2014 and June of 2018. Groundwater samples were collected from monitoring wells LF-01, LF-02, LF-03 and LF-04 surrounding the Onsite Disposal Unit, and monitoring wells M-03B, TW-1, TW-3, TW-6, TW-8, TW-11, MW-19C and MW-31B in the vicinity of the north pit. A surface water sample was collected from the point of compliance in the unnamed creek. All sample locations are presented on Figure 2. All samples were analyzed for benzene, resorcinol, THD, p-PSA, BSA and BMDSA. The results are summarized in Appendix B. No significant groundwater trends were noted when comparing the 2014 and 2018 results, but concentrations in groundwater have significantly decreased, in most cases by an order of magnitude, since the 1989 ROD.

While there is a Maximum Contaminant Level for benzene, there are no Maximum Contaminant Levels (MCLs) for other site COCs. Benzene was not detected in any of the groundwater samples. Since the ROD was issued, PADEP promulgated a State-Wide Health Standard (SHS) Medium Specific Concentration (MSC) for resorcinol in groundwater of 83,000 micrograms per liter ( $\mu$ g/L) for residential use and 230,000  $\mu$ g/L for non-residential use. In the last five years the highest resorcinol concentration was 21,000  $\mu$ g/L. Resorcinol has never been detected at the Site at concentrations above the PADEP SHS MSC.

Resorcinol, BMDSA, BSA, and p-PSA now have surface water standards. The current Pennsylvania surface water standards are presented in Table 4. The June 2018 surface water sampling event was nondetect for all the COCs with the detection limit of 1  $\mu$ g/L for benzene and estimated at 50  $\mu$ g/L for resorcinol. These nondetect values are below PADEP surface water standards.

	Fish and Aqua	Human	
Compound	Criterion Continuous Concentration (µg/L)	Criterion Maximum Concentration (µg/L)	Health Criteria (µg/L)
Benzene	130	640	1.2
Resorcinol	7,200	28,000	2,700
BMDSA	1,600,000	2,600,000	N/A
BSA	1,200,000	2,000,000	N/A
p-PSA	1,400,000	3,500,000	N/A

 Table 4: Pennsylvania Surface Water Standards

### Site Inspection

The inspection of the Site was conducted on June 12, 2018 and consisted of a visual inspection of the Onsite Disposal Unit, Cap Area, seep interceptor system, onsite storage tank, fencing, and bio swale area. All of the inspected components appeared to be in good condition and no issues or deficiencies were observed that would compromise the protectiveness of the remedy. The inspection team observed several invasive shrubs at the Site. The Unnamed Creek was inspected, and macroinvertebrates were observed under rocks in the unnamed creek. Based on this quick assessment it was noted that the number of organisms seem to be increasing.

## V. TECHNICAL ASSESSMENT

**QUESTION A:** Is the remedy functioning as intended by the decision documents?

#### **Question A Summary:**

Yes, based on a review of documents and the inspection, the remedy is functioning as intended by the decision documents. The Onsite Disposal Unit eliminated the direct contact exposure pathway to contaminated soils. The capping of the north disposal pit area has reduced the amount of Seep A groundwater that is collected in an aboveground storage tank and treated of offsite. Approximately 5 times less groundwater is collected now than before the installation of the Cap Area. All nearby residents are connected to public water and a deed notice for the Site is in place restricting site activities to minimized exposure to contamination and protect the integrity of the remedy.

**QUESTION B:** Are the exposure assumptions, toxicity data, cleanup levels, and RAOs used at the time of the remedy selection still valid?

#### **Question B Summary:**

The RAOs stated in the ROD remain valid. While there have been significant changes in the risk assessment methodology, toxicity factors and exposure factors since the ROD was issued, these changes do not affect the protectiveness of the remedy. Since the ROD was issued several of the COCs now have surface water and groundwater standards. As part of the data review section of this FYR, groundwater and surface water concentrations were compared to these new standards and no concentration exceeded any current standard.

**QUESTION C:** Has any **other** information come to light that could call into question the protectiveness of the remedy?

No.

## **VI. ISSUES/RECOMMENDATIONS**

### **Issues/Recommendations**

OU(s) without Issues/Recommendations Identified in the Five-Year Review:

*OU-1, OU-2 and OU-3* 

## VII. PROTECTIVENESS STATEMENT

#### Protectiveness Statement(s)

Operable Unit:	Protectiveness Determination:
OU-1	Protective

Protectiveness Statement:

The remedy for the disposal pits is protective of human health and the environment due to the excavation of contaminated material from the disposal pits, solidification of the material, and placement of the material in the Onsite Disposal Unit. Institutional controls have been implemented, prohibiting disturbance of the components of the remedy and restricting use of the Site.

### Protectiveness Statement(s)

Operable Unit:	Protectiveness Determination:
OU-3	Protective

Protectiveness Statement:

The remedy for the contaminated Seeps is protective of human health and the environment due to the installation of the seep interceptor system with offsite treatment and installation of the Cap Area. Institutional controls have been implemented restricting groundwater use at the Site.

#### Sitewide Protectiveness Statement

*Protectiveness Determination:* Protective

Protectiveness Statement:

The remedy at the Site is protective of human health and the environment. Construction of the remedy has been completed in accordance with the ROD and ESD, institutional controls are in place, and O&M is being conducted in accordance with the O&M Plan. All RAOs, performance standards, and cleanup goals established in the ROD have been achieved.

#### Government Performance and Results Act (GPRA) Measure Review

As part of this FYR the GPRA Measures have also been reviewed. The GPRA Measures and their status are provided as follows:

<u>Environmental Indicators</u> Human Health: Human Health Under Control Groundwater Migration: Groundwater Migration Under Control

<u>Sitewide Ready for Anticipated Use</u> The Site achieved Sitewide Ready for Anticipated Use on June 27, 2008.

## VIII. NEXT REVIEW

The next five-year review report for the Craig Farm Drum Superfund Site is required five years from the completion date of this review.

#### Cruelty-From Page 1

way was unable to speak to the homeowner. He then natified the county's ani-mal response team, which recommended an immedi-ate rescue of the dogs and cats. ate rescue or the dogs and cats. Treadway got a first-hand look at the conditions in the

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small bowl on the kitchen counter. The animals were taken to the Butler County Humanc Society and tested. All six dogs, documents said, were found to be infected with giardia, an intestinal para-site

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Were in the category at the state. "When questioned about food, water or heat." Pread-way's affidarit said, "Murphy but no resonance." Net of the state of the state of the state variance of the state of the state of the state variance of the state of the state of the state of the state variance of the state of the state of the state of the state variance of the state of t

#### CYCLING TOWARD BETTER HEALTH

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Friday, February 22, 2019 - BUTLER EAGLE 3

Scores-

From Page 1 standardized testing throughout the country. Bob Schaeffer, the groups public efficient of direct a good example of a state where universities are placing less importance on test scores. Outside of public universities, the majority of collegges score optional," he said. SAT scores are a poor measure of educational quality. Schaeffer said. Good scores correlate more classific to relate lege success. "It tells you nothing "It tells you nothing" From Page 1

lege success. "It tells you nothing about the quality of educa-

into the SAT." The high-score earners in Butler County appear to reflect that notion. The Mars and Seneca Valley School District here the Butler YMCA Executive Director Sandra Ihlenfeld heads up a group cycling class Thursday evening at the North Washing-ton Street facility. More than a dozen students biked their way to better health during the 45-minute workout. The YMCA offers four different types of cycling classes throughout the weak.

that plagued the church for

decades. In less than a year, the United States alone has seen the defrocking of top Cardinal Theodore McCar-

tion, it's merely a measure of the level of wealth," Schaeffer said. "They shouldn't put much stock into the SAT."

Mars and Seneca valley School Districts have the highest average SAT scores in the county, and both districts cover areas with higher median incomes than the northern parts of

that the most second second

Look to the Community section for news about clubs and civic groups



Pope seeks sex abuse solutions







vestigation. The Hile Funeral Home in Karns City is handling the funeral arrangements, which are available in his obituary on **Page 6**.



Protecting human health and the environment

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## **APPENDIX B – ANALYTICAL RESULTS**

### Table B-1: 2018 Sampling Event Results

		LF-01	LF-01 DUP	LF-02	LF-03	LF-04	M-03B	M-19C
		6/12/2018	6/12/2018	6/12/2018	6/12/2018	6/12/2018	6/12/2018	6/12/2018
Benzene	μg/L	10	10	1 U	10	10	1 U	10
Benzene meta disulfonic acid	μg/L	17 J	22 J	26 J	20 J	13 J	51 J	46 J
Benzene sulfonic acid	μg/L	50 UJ						
Para-phenolsulfonic acid	μg/L	50 UJ	77 J	210 J				
Resorcinol	μg/L	50 UJ	900 J	140 J				
Trihydroxydiphenyl	μg/L	43 J	40 J	50 UJ	50 UJ	50 UJ	120,000 J	170,000 J

		M-31B	TW-01	TW-03	TW-06	TW-08	TW-11	Unnamed Creek
		6/13/2018	6/12/2018	6/12/2018	6/13/2018	6/13/2018	6/12/2018	6/13/2018
Benzene	μg/L	10	10	10	10	10	10	10
Benzene meta disulfonic acid	µg/L	35 J	36 J	30 J	33 J	74 J	23 J	50 UJ
Benzene sulfonic acid	µg/L	50 UJ						
Para-phenolsulfonic acid	µg/L	99 J	50 UJ	50 UJ	14 J	9.5 J	50 UJ	50 UJ
Resorcinol	µg/L	4.9 J	18 J	22 J	140 J	800 J	50 UJ	50 UJ
Trihydroxydiphenyl	μg/L	9,200 J	14,000 J	10,000 J	20,000 J	77,000 J	1,200 J	50 UJ

Legend:

µg/L - micrograms per liter

U - not detected

J - estimated value

## Table B-2: 2014 Sampling Event Results

		LF-01	LF-02	LF-03	LF-04	M-03B	M-19C	M-19C DUP
		3/5/2014	3/5/2014	3/5/2014	3/5/2014	3/5/2014	3/5/2014	3/5/2014
Benzene	μg/L	10	10	10	10	10	10	10
Benzene meta disulfonic acid	μg/L	36 J	45 J	41 J	032 J	110	120	110
Benzene sulfonic acid	μg/L	50 U	50 U					
Para-phenolsulfonic acid	µg/L	50 U	50 U	50 U	50 U	160	330	270
Resorcinol	μg/L	50 U	50 U	50 U	50 U	11,000	19,000	21,000
Trihydroxydiphenyl	μg/L	50 U	50 U	50 U	50 U	130,000	160,000 J	240,000 J

		M-31B	TW-01	TW-03	TW-06	TW-08	TW-11	Unnamed Creek
		3/5/2014	3/5/2014	3/5/2014	3/5/2014	3/5/2014	3/5/2014	3/5/2014
Benzene	µg/L	10	10	10	10	10	10	10
Benzene meta disulfonic acid	µg/L	120	49 J	51	64	97	31 J	120
Benzene sulfonic acid	µg/L	50 U						
Para-phenolsulfonic acid	µg/L	220	18 1	21 J	45 J	15 J	11 J	50 U
Resorcinol	µg/L	240	39 J	120	950	800	50 U	50 U
Trihydroxydiphenyl	µg/L	28,000	12,000	20,000	50,000	59,000	690	50 U

Legend:

µg/L - micrograms per liter

U - not detected

J - estimated value