



Department of Energy

Ohio Field Office
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4458

AUG 08 2002

Thomas & Gertrude Schneider

DOE-0629-02

Dear Mr. & Mrs. Schneider:

GROUNDWATER MONITORING WELL RESULTS FOR 2001

As you are aware, the U.S. Department of Energy (DOE) has installed groundwater Monitoring Wells 2396, 2552, 3396, and 3552 on your property to collect water samples for analysis. DOE samples these four wells to track the progress of the site's groundwater restoration.

This letter presents the results of the samples collected in 2001 for Monitoring Wells 2396, 2552, 3396, and 3552. Analytical results through 2000 have been previously provided to you.

We appreciate your participation in this important program and the water quality results will continue to be reported to you. Also, the water quality monitoring results can be found in annual site environmental reports (issued in June of each year), which are available at the Fernald Environmental Management Project (FEMP) Public Environmental Information Center.

Methodology

FEMP personnel have sampled these monitoring wells per the U.S. Environmental Protection Agency (EPA) and Ohio Environmental Protection Agency requirements. Data from samples collected from the monitoring wells are used to determine the quality of the groundwater in the area surrounding the FEMP.

Results and Discussion

Total uranium is considered the primary constituent of concern at the FEMP. Table 1 summarizes the monitoring results from the four wells for total uranium and compares them to the uranium groundwater Final Remediation Level (FRL). An Explanation of Significant Differences (ESD) pertaining to the site groundwater remedy was approved by EPA on November 30, 2001. The ESD amended the Operable Unit 5 Record of Decision by adopting the Safe Drinking Water Act Maximum Contaminant Level for uranium (30 micrograms per liter [$\mu\text{g/L}$]) as both the FRL for groundwater restoration and the uranium effluent discharge limit to the Great Miami River. Since the new FRL was in effect at the end of 2001, it was used as the basis of comparison for the entire year. The 2001 total uranium results from the four wells have remained below the FRL.

Attachment A is a Fact Sheet that provides explanations of the terms used in this transmittal. When reviewing the monitoring results for each sampling period, please keep in mind that FEMP personnel

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sample monitoring wells for specific projects. As the FEMP continues its groundwater remediation efforts, the requirements for each project change; therefore, constituents analyzed by the laboratory may also change. Consequently, the constituents analyzed may vary from one sampling event to the next depending on what data are needed in order to fulfill reporting requirements.

The wells on your property were sampled for a range of constituents. The FEMP has conducted independent analyses for these constituents to investigate the possible presence of these constituents at elevated concentrations in groundwater attributable to historical FEMP processing operations. The FEMP has committed to remediate the groundwater in the affected portion of the Great Miami Aquifer and is currently engaged in active groundwater restoration. The aquifer is being cleaned up to concentrations known as FRLs, which are defined in the Record of Decision for Remedial Actions at Operable Unit 5. Attachment A contains more information on FRLs.

Attachment B presents the monitoring results from these four wells and the associated FEMP groundwater FRLs. If there was more than one sample result per day (e.g., a duplicate sample), then only the maximum sample concentration is reported and compared to its FRL so as to provide you with the most conservative result.

TABLE 1
2001 MONITORING WELL SUMMARY RESULTS FOR TOTAL URANIUM

Monitoring Well	FRL	Ranges for this Well
2396	30 µg/L	0.593 to 3.43 µg/L
2552	30 µg/L	12.434 to 18.9 µg/L
3396	30 µg/L	0.356 to 0.604 µg/L
3552	30 µg/L	0.429 to 0.85 µg/L

Additional information concerning the FEMP restoration plan and documents referred to above are available at the FEMP Public Environmental Information Center located in the Delta Building at 10995 Hamilton-Cleves Highway, Harrison, OH; phone: (513) 648-7480.

DOE is committed to making the environmental restoration of the FEMP effective and successful. Your cooperation in this effort is greatly appreciated. If you have any questions regarding your monitoring results, then please contact Kathleen Nickel at (513) 648-3166.

Sincerely,

Johnny W. Reising
Associate Director
Environmental Management

Mr. & Mrs. Schneider

DOE-0629-02

Attachments: As stated

cc w/enclosure:

R. Janke, OH/FEMP
K. Nickel, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SRF-5J
F. Bell, ATSDR
M. C. Wojciechowski, Tetra Tech
M. Shupe, HSI GeoTrans
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R. Greenberg, EM-31/CLOV
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D. Brettschneider, Fluor Fernald, Inc./MS52-5
D. Carr, Fluor Fernald, Inc./MS2
M. Frank, Fluor Fernald, Inc./MS90
T. Hagen, Fluor Fernald, Inc./MS9
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M. Jewett, Fluor Fernald, Inc./MS52-5
T. Poff, Fluor Fernald, Inc./T23/4
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ATTACHMENT A

FACT SHEET

This attachment provides explanations for the terms used in this information packet. Please refer to the cover letter for additional information.

Monitoring Results

The monitoring well results report the name of the constituent analyzed, the concentration measured, and the unit of concentration. Some FEMP projects require a determination of the dissolved (filtered) constituent concentration, as well as the total (unfiltered) concentration. Filtering a groundwater sample results in the removal of suspended soil particles that are greater than 0.45 micrometers in diameter. This diameter is approximately equivalent to 1/200 of the thickness of this page.

Units

The monitoring well results are reported in standard concentration or radioactivity units. These are:

- $\mu\text{g/L}$ (micrograms per liter) A unit of measure of the concentration of a substance. This unit is approximately equivalent to parts per billion (ppb). As an illustration, 1 $\mu\text{g/L}$ (ppb) is roughly one drop of gasoline in a railroad box car full of water.
- mg/L (milligrams per liter) A unit of measure of the concentration of a substance. This unit is approximately equivalent to parts per million (ppm). As an illustration, 1 mg/L (ppm) is roughly one drop of gasoline in the gas tank of a full-size automobile.
- pCi/L (picocuries per liter) A unit of measure of the radioactivity of a substance. Radioactivity is the process in which the nucleus of an unstable atom spontaneously decays or disintegrates. Radiation is the energy that is released when the disintegration or decay occurs.

Final Remediation Levels

The Operable Unit 5 Record of Decision established FRLs for FEMP-related contaminants in environmental media (i.e., soil, surface water, sediment, and groundwater). These FRLs are legally binding cleanup levels that will be used to track and certify the completion of the FEMP's remediation process. FRLs were specifically developed for the Great Miami Aquifer for those constituents that are presently in the Great Miami Aquifer and those that have the potential (based on modeling) to reach the aquifer within 1,000 years at levels that pose an unacceptable risk to human health and/or the environment.

ATTACHMENT B

TABLE B-1
MONITORING WELL DATA

Monitoring Well	Constituent	Sample Date	Result ^a	FRL
2396	Uranium, Total (filtered)	2/7/01	0.593 µg/L	30 µg/L
	Uranium, Total (unfiltered)	2/7/01	0.619 µg/L	30 µg/L
	Uranium, Total (unfiltered)	5/9/01	0.654 µg/L	30 µg/L
	Uranium, Total (unfiltered)	8/7/01	0.95 µg/L	30 µg/L
	Uranium, Total (unfiltered)	11/19/01	3.43 µg/L	30 µg/L
2552	1,1-Dichloroethene (unfiltered)	5/8/01	ND	7 µg/L
	1,1-Dichloroethene (unfiltered)	5/8/01	ND	7 µg/L
	1,1-Dichloroethane (unfiltered)	5/8/01	ND	7 µg/L
	1,1-Dichloroethane (unfiltered)	5/8/01	ND	7 µg/L
	1,2-Dichloroethane (unfiltered)	2/6/01	ND	5 µg/L
	1,2-Dichloroethane (unfiltered)	2/6/01	ND	5 µg/L
	1,2-Dichloroethane (unfiltered)	5/8/01	ND	5 µg/L
	1,2-Dichloroethane (unfiltered)	5/8/01	ND	5 µg/L
	1,2-Dichloroethane (unfiltered)	8/7/01	ND	5 µg/L
	1,2-Dichloroethane (unfiltered)	11/14/01	ND	5 µg/L
	1,2-Dichloroethane (unfiltered)	11/14/01	ND	5 µg/L
	4-Nitrophenol (unfiltered)	5/8/01	ND	320 µg/L
	4-Nitrophenol (unfiltered)	5/8/01	ND	320 µg/L
	alpha-Chlordane (unfiltered)	5/8/01	ND	2 µg/L
	alpha-Chlordane (unfiltered)	5/8/01	ND	2 µg/L
	Antimony (filtered)	5/8/01	ND	0.0060 mg/L
	Antimony (filtered)	5/8/01	ND	0.0060 mg/L
	Aroclor-1254 (unfiltered)	5/8/01	ND	0.20 µg/L
	Aroclor-1254 (unfiltered)	5/8/01	ND	0.20 µg/L
	Arsenic (filtered)	5/8/01	ND	0.050 mg/L
	Arsenic (filtered)	5/8/01	ND	0.050 mg/L
	Barium (filtered)	5/8/01	0.0258 mg/L	2.0 mg/L
	Barium (filtered)	5/8/01	0.0269 mg/L	2.0 mg/L
	Benzene (unfiltered)	5/8/01	ND	5 µg/L

TABLE B-1
(Continued)

Monitoring Well	Constituent	Sample Date	Result ^a	FRL
2552 (Cont'd.)	Benzene (unfiltered)	5/8/01	ND	5 µg/L
	Beryllium (filtered)	5/8/01	ND	0.0040 mg/L
	Beryllium (filtered)	5/8/01	ND	0.0040 mg/L
	bis(2-Chloroisopropyl)ether (unfiltered)	5/8/01	ND	5 µg/L
	bis(2-Chloroisopropyl)ether (unfiltered)	5/8/01	ND	5 µg/L
	bis(2-Ethylhexyl)phthalate (unfiltered)	5/8/01	ND	6 µg/L
	bis(2-Ethylhexyl)phthalate (unfiltered)	5/8/01	ND	6 µg/L
	Boron (filtered)	5/8/01	0.0411 mg/L	0.33 mg/L
	Boron (filtered)	5/8/01	0.0452 mg/L	0.33 mg/L
	Bromodichloromethane (unfiltered)	5/8/01	ND	100 µg/L
	Bromodichloromethane (unfiltered)	5/8/01	ND	100 µg/L
	Bromomethane (unfiltered)	5/8/01	ND	2.1 µg/L
	Bromomethane (unfiltered)	5/8/01	ND	2.1 µg/L
	Cadmium (filtered)	5/8/01	ND	0.014 mg/L
	Cadmium (filtered)	5/8/01	ND	0.014 mg/L
	Carbazole (unfiltered)	5/8/01	ND	11 µg/L
	Carbazole (unfiltered)	5/8/01	ND	11 µg/L
	Carbon disulfide (unfiltered)	5/8/01	0.4 mg/L	5.5 µg/L
	Carbon disulfide (unfiltered)	5/8/01	ND	5.5 µg/L
	Chloroethane (unfiltered)	5/8/01	ND	1 µg/L
	Chloroethane (unfiltered)	5/8/01	ND	1 µg/L
	Chloroform (unfiltered)	5/8/01	ND	100 µg/L
	Chloroform (unfiltered)	5/8/01	ND	100 µg/L
	Cobalt (filtered)	5/8/01	ND	0.17 mg/L
	Cobalt (filtered)	5/8/01	ND	0.17 mg/L
	Copper (filtered)	5/8/01	0.002 mg/L	1.3 mg/L
	Copper (filtered)	5/8/01	0.002 mg/L	1.3 mg/L
	Fluoride (unfiltered) ^b	5/8/01	ND	4 mg/L
	Fluoride (unfiltered) ^b	5/8/01	ND	4 mg/L
	Lead (filtered) ^b	5/8/01	ND	0.015 mg/L

TABLE B-1
(Continued)

Monitoring Well	Constituent	Sample Date	Result ^a	FRL
2552 (Cont'd.)	Lead (filtered) ^b	5/8/01	ND	0.015 mg/L
	Manganese (filtered)	5/8/01	0.0022 mg/L	0.900 mg/L
	Manganese (filtered)	5/8/01	0.0022 mg/L	0.900 mg/L
	Mercury (unfiltered)	2/6/01	ND	0.0020 mg/L
	Mercury (unfiltered)	2/6/01	ND	0.0020 mg/L
	Mercury (filtered)	5/8/01	0.00014	0.0020 mg/L
	Mercury (filtered)	5/8/01	ND	0.0020 mg/L
	Mercury (unfiltered)	8/7/01	ND	0.0020 mg/L
	Mercury (unfiltered)	11/14/01	ND	0.0020 mg/L
	Mercury (unfiltered)	11/14/01	ND	0.0020 mg/L
	Methylene chloride (unfiltered)	5/8/01	ND	5 µg/L
	Methylene chloride (unfiltered)	5/8/01	ND	5 µg/L
	Molybdenum (filtered)	5/8/01	0.0023 mg/L	0.10 mg/L
	Molybdenum (filtered)	5/8/01	ND	0.10 mg/L
	Neptunium-237 (unfiltered)	2/6/01	ND	1.0 pCi/L
	Neptunium-237 (unfiltered)	2/6/01	ND	1.0 pCi/L
	Neptunium-237 (filtered)	5/8/01	0.066 pCi/L	1.0 pCi/L
	Neptunium-237 (filtered)	5/8/01	ND	1.0 pCi/L
	Neptunium-237 (unfiltered)	8/7/01	ND	1.0 pCi/L
	Neptunium-237 (unfiltered)	11/14/01	ND	1.0 pCi/L
Neptunium-237 (unfiltered)	11/14/01	ND	1.0 pCi/L	
Nickel (filtered)	5/8/01	ND	0.10 mg/L	
Nickel (filtered)	5/8/01	ND	0.10 mg/L	
Nitrate/Nitrite (unfiltered) ^c	2/6/01	3.32 mg/L	11 mg/L	
Nitrate/Nitrite (unfiltered) ^c	2/6/01	3.52 mg/L	11 mg/L	
Nitrate/Nitrite (unfiltered) ^c	5/8/01	3.05 mg/L	11 mg/L	
Nitrate/Nitrite (unfiltered) ^c	5/8/01	ND	11 mg/L	
Nitrate/Nitrite (unfiltered) ^c	8/7/01	1.94 mg/L	11 mg/L	
Nitrate/Nitrite (unfiltered) ^c	11/14/01	0.037 mg/L	11 mg/L	
Nitrate/Nitrite (unfiltered) ^c	11/14/01	0.075 mg/L	11 mg/L	
p-Methylphenol (unfiltered)	5/8/01	ND	29 µg/L	

TABLE B-1
(Continued)

Monitoring Well	Constituent	Sample Date	Result ^a	FRL
2552 (Cont'd.)	p-Methylphenol (unfiltered)	5/8/01	ND	29 µg/L
	Radium-226 (filtered)	5/8/01	ND	20 pCi/L
	Radium-226 (filtered)	5/8/01	ND	20 pCi/L
	Radium-228 (filtered)	5/8/01	ND	20 pCi/L
	Radium-228 (filtered)	5/8/01	ND	20 pCi/L
	Selenium (filtered)	5/8/01	ND	0.050 mg/L
	Selenium (filtered)	5/8/01	ND	0.050 mg/L
	Silver (filtered)	5/8/01	ND	0.050 mg/L
	Silver (filtered)	5/8/01	ND	0.050 mg/L
	Strontium-90 (unfiltered)	2/6/01	ND	8.0 pCi/L
	Strontium-90 (unfiltered)	2/6/01	ND	8.0 pCi/L
	Strontium-90 (filtered)	5/8/01	ND	8.0 pCi/L
	Strontium-90 (filtered)	5/8/01	ND	8.0 pCi/L
	Strontium-90 (unfiltered)	8/7/01	ND	8.0 pCi/L
	Strontium-90 (unfiltered)	11/14/01	0.179 pCi/L	8.0 pCi/L
	Strontium-90 (unfiltered)	11/14/01	0.277 pCi/L	8.0 pCi/L
	Technetium-99 (filtered)	5/8/01	ND	94 pCi/L
	Technetium-99 (filtered)	5/8/01	ND	94 pCi/L
	Thorium-228 (filtered)	5/8/01	ND	4.0 pCi/L
	Thorium-228 (filtered)	5/8/01	ND	4.0 pCi/L
	Thorium-230 (filtered)	5/8/01	ND	15 pCi/L
	Thorium-230 (filtered)	5/8/01	ND	15 pCi/L
	Thorium-232 (filtered)	5/8/01	ND	1.2 pCi/L
	Thorium-232 (filtered)	5/8/01	ND	1.2 pCi/L
	Trichloroethene (unfiltered)	5/8/01	ND	5.0 µg/L
	Trichloroethene (unfiltered)	5/8/01	ND	5.0 µg/L
	Uranium, Total (unfiltered)	2/6/01	12.434 µg/L	30 µg/L
	Uranium, Total (unfiltered)	2/6/01	12.628 µg/L	30 µg/L
	Uranium, Total (filtered)	5/8/01	12.464 µg/L	30 µg/L
	Uranium, Total (filtered)	5/8/01	13.103 µg/L	30 µg/L
	Uranium, Total (unfiltered)	5/8/01	12.947 µg/L	30 µg/L

TABLE B-1
(Continued)

Monitoring Well	Constituent	Sample Date	Result ^a	FRL
2552 (Cont'd.)	Uranium, Total (unfiltered)	5/8/01	13.123 µg/L	30 µg/L
	Uranium, Total (unfiltered)	8/7/01	16.025 µg/L	30 µg/L
	Uranium, Total (unfiltered)	11/14/01	17.8 µg/L	30 µg/L
	Uranium, Total (unfiltered)	11/14/01	18.9 µg/L	30 µg/L
	Vanadium (filtered)	5/8/01	ND	0.038 mg/L
	Vanadium (filtered)	5/8/01	ND	0.038 mg/L
	Vinyl chloride (unfiltered)	5/8/01	ND	2.0 µg/L
	Vinyl chloride (unfiltered)	5/8/01	ND	2.0 µg/L
	Zinc (filtered)	5/8/01	ND	0.021 mg/L
	Zinc (filtered)	5/8/01	ND	0.021 mg/L
3396	Uranium, Total (unfiltered)	2/7/01	0.571 µg/L	30 µg/L
	Uranium, Total (filtered)	5/9/01	0.604 µg/L	30 µg/L
	Uranium, Total (unfiltered)	5/9/01	0.575 µg/L	30 µg/L
	Uranium, Total (unfiltered)	8/7/01	0.356 µg/L	30 µg/L
	Uranium, Total (unfiltered)	11/19/01	0.525 µg/L	30 µg/L
3552	1,1-Dichloroethene (unfiltered)	5/8/01	ND	7.0 µg/L
	1,1-Dichloroethane (unfiltered)	5/8/01	ND	7 µg/L
	1,2-Dichloroethane (unfiltered)	2/6/01	ND	5.0 µg/L
	1,2-Dichloroethane (unfiltered)	5/8/01	ND	5.0 µg/L
	1,2-Dichloroethane (unfiltered)	8/7/01	ND	5.0 µg/L
	1,2-Dichloroethane (unfiltered)	11/14/01	ND	5.0 µg/L
	4-Nitrophenol (unfiltered)	5/8/01	ND	320 µg/L
	alpha-Chlordane (unfiltered)	5/8/01	ND	2.0 µg/L
	Antimony (filtered)	5/8/01	ND	0.0060 mg/L
	Aroclor-1254 (unfiltered)	5/8/01	ND	0.20 µg/L
	Arsenic (filtered)	5/8/01	ND	0.050 mg/L
	Barium (filtered)	5/8/01	0.0814 mg/L	2.0 mg/L
	Benzene (unfiltered)	5/8/01	ND	5 µg/L
	Beryllium (filtered)	5/8/01	ND	0.0040 mg/L
	bis(2-Chloroisopropyl)ether (unfiltered)	5/8/01	ND	5 µg/L
	bis(2-Ethylhexyl)phthalate (unfiltered)	5/8/01	ND	6 µg/L

TABLE B-1
(Continued)

Monitoring Well	Constituent	Sample Date	Result ^a	FRL
3552 (Cont'd.)	Boron (filtered)	5/8/01	ND	0.33 mg/L
	Bromodichloromethane (unfiltered)	5/8/01	ND	100 µg/L
	Bromomethane (unfiltered)	5/8/01	ND	2.1 µg/L
	Cadmium (filtered)	5/8/01	ND	0.014 mg/L
	Carbazole (unfiltered)	5/8/01	ND	11 µg/L
	Carbon disulfide (unfiltered)	5/8/01	ND	5.5 µg/L
	Chloroethane (unfiltered)	5/8/01	ND	1 µg/L
	Chloroform (unfiltered)	5/8/01	ND	100 µg/L
	Cobalt (filtered)	5/8/01	ND	0.17 mg/L
	Copper (filtered)	5/8/01	ND	1.3 mg/L
	Fluoride (unfiltered) ^b	5/8/01	ND	4 mg/L
	Lead (filtered) ^b	5/8/01	ND	0.015 mg/L
	Manganese (filtered)	5/8/01	0.195 mg/L	0.900 mg/L
	Mercury (unfiltered)	2/6/01	ND	0.0020 mg/L
	Mercury (filtered)	5/8/01	ND	0.0020 mg/L
	Mercury (filtered)	8/7/01	ND	0.0020 mg/L
	Mercury (filtered)	11/14/01	ND	0.0020 mg/L
	Methylene chloride (unfiltered)	5/8/01	ND	5 µg/L
	Molybdenum (filtered)	5/8/01	0.0026 mg/L	0.10 mg/L
	Neptunium-237 (unfiltered)	2/6/01	ND	1.0 pCi/L
	Neptunium-237 (filtered)	5/8/01	0.21 pCi/L	1.0 pCi/L
	Neptunium-237 (filtered)	8/7/01	ND	1.0 pCi/L
	Neptunium-237 (filtered)	11/14/01	ND	1.0 pCi/L
	Nickel (filtered)	5/8/01	ND	0.10 mg/L
	Nitrate/Nitrite (unfiltered) ^c	2/6/01	ND	11 mg/L
	Nitrate/Nitrite (unfiltered) ^c	5/8/01	ND	11 mg/L
	Nitrate/Nitrite (unfiltered) ^c	8/7/01	ND	11 mg/L
	Nitrate/Nitrite (unfiltered) ^c	11/14/01	0.203 mg/L	11 mg/L
	p-Methylphenol (unfiltered)	5/8/01	ND	29 µg/L
	Radium-226 (filtered)	5/8/01	0.82 pCi/L	20 pCi/L
	Radium-228 (filtered)	5/8/01	ND	20 pCi/L

TABLE B-1
(Continued)

Monitoring Well	Constituent	Sample Date	Result ^a	FRL
3552 (Cont'd.)	Selenium (filtered)	5/8/01	ND	0.050 mg/L
	Silver (filtered)	5/8/01	ND	0.050 mg/L
	Strontium-90 (unfiltered)	2/6/01	ND	8.0 pCi/L
	Strontium-90 (filtered)	5/8/01	ND	8.0 pCi/L
	Strontium-90 (filtered)	8/7/01	ND	8.0 pCi/L
	Strontium-90 (filtered)	11/14/01	ND	8.0 pCi/L
	Technetium-99 (filtered)	5/8/01	ND	94 pCi/L
	Thorium-228 (filtered)	5/8/01	ND	4.0 pCi/L
	Thorium-230 (filtered)	5/8/01	ND	15 pCi/L
	Thorium-232 (filtered)	5/8/01	ND	1.2 pCi/L
	Trichloroethene (unfiltered)	5/8/01	ND	5.0 µg/L
	Uranium, Total (unfiltered)	2/6/01	0.622 µg/L	30 µg/L
	Uranium, Total (filtered)	5/8/01	0.85 µg/L	30 µg/L
	Uranium, Total (unfiltered)	5/8/01	0.845 µg/L	30 µg/L
	Uranium, Total (filtered)	8/7/01	0.629 µg/L	30 µg/L
	Uranium, Total (unfiltered)	8/7/01	0.526 µg/L	30 µg/L
	Uranium, Total (filtered)	11/14/01	0.435 µg/L	30 µg/L
	Uranium, Total (unfiltered)	11/14/01	0.429 µg/L	30 µg/L
	Vanadium (filtered)	5/8/01	ND	0.038 mg/L
	Vinyl chloride (unfiltered)	5/8/01	ND	2.0 µg/L
Zinc (filtered)	5/8/01	ND	0.021 mg/L	

^aND = non-detectable concentrations; the lowest concentration that can be reliably detected is known as the detection limit. Non-detectable concentrations are between zero and the detection limit.

^bThe FRLs for fluoride and lead were changed and documented in the Operable Unit 5 Record of Decision by change pages.

^cThe FRL of 11 mg/L is for nitrate, but because of holding time considerations, nitrate/nitrite is analyzed. This is acceptable because nitrate/nitrite provides a more conservative result.