SECOND QUARTER 2004 PROGRESS REPORT
VERNAY LABORATORIES, INC.
PLANT 2/3 FACILITY
YELLOW SPRINGS, OHIO

Project No. 0292.11.26

July 14, 2004

Prepared For

VERNAY LABORATORIES, INC.
875 Dayton Street
Yellow Springs, Ohio 45387

Prepared By

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VIA FEDERAL EXPRESS
AM Priority

July 14, 2004

United States Environmental Protection Agency
Region 5
Corrective Action Section, DW-8J
77 West Jackson
Chicago, Illinois 60604

Attention: Ms. Patricia J. Polston, Project Manager
Waste Management Branch

Reference: Quarterly Progress Report (Second Quarter 2004)
Administrative Order on Consent
Vernay Laboratories, Inc.
Yellow Springs, Ohio
Project No. 0292.11.26

Dear Ms. Polston:

The Payne Firm, Inc. (Payne Firm) is pleased to submit, on behalf of Vernay Laboratories, Inc. (Vernay), the attached Progress Report for the Second Quarter 2004, as required by the Administrative Order on Consent (AOC) journalized by the United States Environmental Protection Agency (U.S. EPA) on September 27, 2002.

We understand that the U.S. EPA plans to provide this quarterly progress report on the U.S. EPA's website at www.epa.gov/region5/sites/vernay. The electronic version of this quarterly progress report is also included on a CD-Rom in Appendix I.

Should you have any questions regarding the enclosed document, please contact either of us at (513) 489-2255 or via e-mail at dcc@paynefirm.com or ddw@paynefirm.com.

Sincerely,

The Payne Firm, Inc.

David C. Contant, L.G.
Project Manager

Daniel D. Weed, C.P.G.
Principal

cc: Mr. Doug Fisher – Vernay Laboratories, Inc.
Mr. Joseph Lonardo – Vorys, Sater, Seymour and Pease
Mr. Rob Hillard – Village of Yellow Springs
Ms. Connie Collett – Yellow Springs Community Library

PROGRESS REPORT - SECOND QUARTER 2004
Vernay Laboratories, Inc. RCRA Corrective Action
Yellow Springs, Ohio

A. IDENTIFICATION OF FACILITY AND ACTIVITY

Vernay Laboratories, Inc. (Vernay) agreed to an Administrative Order on Consent (AOC), journalized September 27, 2002, to complete a United States Environmental Protection Agency (U.S. EPA) Resource Conservation and Recovery Act (RCRA) Corrective Action for the Vernay Facility located at 875 Dayton Street in Yellow Springs, Ohio.

B. STATUS OF WORK AT THE FACILITY AND PROGRESS DURING THE QUARTER

The status of the work at the Facility and a summary of the progress made during the quarter are presented below.

1. Phase I RFI Report

As required by the AOC Section VI.13., Vernay prepared the *U.S. EPA RCRA Corrective Action, Facility Investigation Phase I Report,* (RFI Phase I report) dated June 29, 2004. Vernay submitted the Phase I RFI report to the U.S. EPA on June 29, 2004 and also submitted the report to the Village of Yellow Springs and the Yellow Springs Community Library. In addition, we understand the U.S. EPA plans to provide portions of the Phase I RFI report on its website at www.epa.gov/region5/sites/vernay.

The RFI is being conducted and reported in two phases (Phase I and Phase II). Phase I of the RFI was completed between September 2002 and June 2004. The primary objective the Phase I RFI was to determine the extent of ground water contamination in the Cedarville Aquifer (the uppermost aquifer beneath the Facility and the surrounding area) and storm sewer backfill, and to determine if a deeper aquifer beneath the Facility (Brassfield Aquifer) needs to be investigated during Phase II of the RFI. The Phase I RFI also involved determining the nature and extent of contamination at or from the Facility in soil, sediment, surface water and indoor air; and, construction and operation of a second ground water extraction well on the Facility.

Another objective of the Phase I RFI was to collect sufficient information to complete the *RCRA Corrective Action Environmental Indicator (EI) for Current Human Exposures Under Control* (CA725) report. This activity included the completion of a water well survey in the vicinity of the Facility to determine the usage of ground water in the area, and to obtain human health exposure information needed to complete the CA725 EI report. Ground water data collected during the Phase I RFI will also be used to complete the *RCRA Corrective Action Migration of Contaminated Ground Water Under Control* (CA750) EI report.

Based on the results of the investigation of the nature and extent of contamination of the Cedarville Aquifer during the Phase I RFI, it was determined that an investigation of the Brassfield Aquifer during Phase II of the RFI is not needed to meet the objectives of the CA750 EI and the AOC. As indicated in the AOC, final determination concerning the investigation of the Brassfield Aquifer during the Phase II RFI will be made by the U.S. EPA.

Phase II of the RFI will consist of completing the determination of the nature and extent of contamination in soil beneath the Facility, an assessment of the fate and transport of contaminants from the Facility, quarterly monitoring, and completion of the baseline human health and

ecological risk assessments. As required by Section VI. 14. of the AOC, the Phase II RFI report will be submitted to the U.S. EPA by December 31, 2004.

2. Water Well Survey and Sampling Results

On December 22, 2003, the Greene County Combined Health District (GCCHD), in cooperation with the Payne Firm, initiated a survey within a defined area in Yellow Springs to identify wells or other structures that may collect ground water (Survey). Results from the Survey were presented in the First Quarter 2004 Progress Report. Consistent with the objectives of the Survey, nine water wells that were reported as being used were sampled for Volatile Organic Compounds (VOCs). The final analytical results were received and validated during the Second Quarter 2004 and presented to each property owner and the GCCHD.

In addition to the sampling of the water wells in use, the Payne Firm coordinated the connection of the property located at 401 Suncrest Drive to the Village of Yellow Springs water system between March 30 and April 1, 2004. On April 5, 2004, the Payne Firm attempted to locate the water well, which is reportedly located at 550 Green Street, by installing several trenches with no success at locating the water well. Permission has not been granted for Vernay to locate, sample and abandon the water well at 550 Green Street/401 Suncrest Drive even though the well has been disconnected.

Vernay prepared a *RCRA Water Well Identification and Sampling Report* dated June 29, 2004. The report was included in Appendix VI of the Phase I RFI report submitted to the U.S. EPA on June 29, 2004. It was determined from the Survey that current human exposures to identified water wells were under control.

3. Human Health Environmental Indicator (CA725) Report

A draft CA725 EI report was submitted to the U.S. EPA on April 9, 2004 for review. The CA725 EI is an assessment of actual current human risks and is in the form of a qualitative assessment of the completeness of exposure pathways. The draft CA725 EI report concluded that current human exposures to constituent concentrations in these media are under control.

On June 18, 2004, the U.S. EPA provided comments to the draft CA725 EI report. A final CA725 will be submitted to the U.S. EPA by July 15, 2004.

4. Ground Water Flow Modeling Report for the Cedarville Aquifer

On June 29, 2004, Vernay prepared the *RCRA Ground Water Flow Modeling Report for the Cedarville Aquifer* which was included in Appendix VII of the Phase I RFI report. The ground water flow modeling report presented a detailed description of the ground water flow model, including the modeling objectives, computer code selection, model construction, model calibration, and particle tracking analysis. The results of the ground water flow modeling indicate that the model is well calibrated with actual ground water data that were collected during the Phase I RFI. The ground water flow model will continue to be calibrated with data collected during Phase II of the RFI.

5. Comments to TM-4, Soil Confirmation

Vernay prepared the *RCRA Corrective Action, Technical Memorandum No. 4, Soil Confirmation,* (TM-4) dated March 18, 2004 discussing the soil data confirmation process used to demonstrate the relevancy of historical soil data; TM-4 was included in the First Quarter 2004 Progress

Report. In a previous review by the U.S. EPA of historical data (TM-2), Vernay was found to have made a good faith effort reviewing the relevancy of their pre-RFI ground water, surface water, and sediment data to the RFI and relying on the guidance supplied by the Region's 1998 RCRA QA Policy. Based on U.S. EPA comments for TM-2, the U.S. EPA accepted the use of historical data to establish trend analyses in ground water, sediments, and surface water, but did not accept the use of historical Update II (Method 5030) data to establish trend analyses for soil. Instead, U.S. EPA requested additional soil data collection to be completed and confirmation demonstrated. As requested, the submittal from Vernay (TM-4) provided confirmation for historical soil data collected from 1998 to 2001.

The results from TM-4 (soil confirmation) were discussed with the U.S. EPA and Vernay during a conference call on April 15, 2004. The U.S. EPA comments to TM-4 were submitted to Vernay in correspondence dated May 14, 2004. It was explained that U.S. EPA could not accept past soil Update II VOCs data as quantified, accurate data sufficient for risk analysis calculations. The U.S. EPA stated that the historical soil Update II VOC data may be used for other qualitative purposes and can be incorporated into environmental indicator determinations. As indicated by the U.S. EPA, the historical soil VOC data may also provide rationale for sampling design, or indicate where hot spot zones of contamination exist. However, following Vernay's completion of the requested confirmation demonstration and because of the low results bias, the U.S. EPA cannot accept any of the pre-RFI soil Update II VOC data for use in quantitative site risk assessments. As a result, Vernay will collect additional soil VOC data using Update III (Method 5035) during Phase II of the RFI.

6. Project Laboratory Audit

As required in Section 11.2 of the project QAPP, the Payne Firm's project Data Validation Coordinator and Project Manager conducted an internal performance and systems audit of the project laboratory (STL) in north Canton, Ohio on May 7, 2004. The audit included examination of laboratory documentation and sample receipt, sample log-in, sample storage, chain-of-custody procedures, sample preparation and analysis, instrument operating records, etc. and an evaluation of blind performance samples to ensure the laboratory maintains acceptable performance. Based on the results of the audit, no action was necessary regarding the laboratory's performance.

7. Quarterly Ground Water Monitoring Event

As required by AOC Section VI.13., Vernay completed a ground water monitoring event during the second quarter of 2004. The monitoring event was conducted between March 30, 2004 and May 19, 2004. The objective of the quarterly monitoring program is to collect sufficient data to make the appropriate determinations required by the RCRA Ground Water and Human Health Environmental Indicators, to support the baseline risk assessment, and to evaluate corrective measures including the existing ground water extraction interim measure.

- The monitoring network currently consists of 21 monitoring wells (including RW01-05) on the Facility and 32 monitoring wells located off of the Facility, all of which are screened in the upper, middle, or lower portions of the Cedarville Aquifer or within sewer backfill. During this quarterly monitoring event, water samples were collected from all 21 monitoring wells on the Facility property, and from all 32 monitoring wells off of the Facility property. In addition, Vernay sampled two other monitoring wells in the vicinity identified during the well survey, located at 759 and 860 Dayton Street which are screened in the upper Cedarville Aquifer and the Unconsolidated Unit, respectively. The monitoring well network quarterly sampling locations are shown on Figure 1.

- Concentrations of VOCs from on- and off-Facility monitoring wells in sewer backfill and the Cedarville Aquifer are summarized on Tables 32 and 35, respectively, of the Phase I RFI report. Detected concentrations of VOCs from QA/QC samples are also summarized on Table 25 of the Phase I RFI report. Electronic copies of the laboratory analytical reports were included in Appendix VIII-F of the Phase I RFI report.
- In addition to aqueous results from monitoring wells, analytical results for geologic properties analyses (collected during the first quarter) were received during the second quarter. The analytical results for geologic properties were summarized on Table 12 in the Phase I RFI report. Electronic copies of the laboratory analytical reports are included in Appendix I.

8. Monthly Operation and Maintenance Activities

Data associated with the existing ground water interim measure were collected monthly during the quarter. These data include water level measurements from the Facility monitoring well network and water samples analyzed for VOCs from the ground water treatment systems of the capture zone and the utility tunnel sump. Monthly water level elevations were summarized in Appendix VIII-B of the Phase I RFI report. Potentiometric contour maps generated monthly for the Cedarville Aquifer were also included in Appendix II of the Phase I RFI report.

Water samples collected from the capture zone treatment system included: 1) a sample at each wellhead (CW01-01 and CW01-02); 2) a sample after the first carbon vessel; and 3) a system effluent sample after treatment. Likewise, samples collected from the utility tunnel sump treatment system included: 1) a pre-treatment sample; 2) a sample after the first carbon drum; and 3) a sample after the second carbon drum. The VOC data collected from the two treatment systems are summarized on Tables 1 and 2, respectively. Electronic copies of the laboratory analytical reports are included on a CD-Rom in Appendix I.

Consistent with the regular maintenance of the capture zone treatment system at the Facility, one 900 pound carbon vessel was replaced on June 2, 2004.

C. PROBLEMS ENCOUNTERED DURING THE QUARTER

No difficulties were encountered during this quarter.

D. ACTIONS TAKEN TO RECTIFY PROBLEMS

No actions to rectify problems were required this quarter.

E. PROJECT SCHEDULE

Based on the information and recommendations presented in the Phase I RFI report, the following activities are planned for next quarter (Q3-2004).

- Given that the past Update II soil VOC analytical data can only be used for qualitative purposes (as determined by the U.S. EPA), additional soil VOC analytical data using Update III (Method 5035) will be obtained to determine the nature and extent of contamination in soil on and off the Facility. Additional soil SVOC data will also be collected during the Phase II RFI in order to complete the nature and extent characterization in soil on and off the Facility.
- On completion of the Phase II RFI field activities, an assessment of potential current and future risks to human and ecological receptors will be conducted as part of the baseline risk assessment. In support of the risk assessment, fate and transport of Cedarville Aquifer ground water modeling and

vadose zone leaching modeling will be conducted as appropriate to support the CA750 and evaluation of corrective remedial measures for the Facility.

- A quarterly monitoring event will be conducted. This will include sampling all monitoring wells and the surface water at the outfall to the unnamed creek.
- Continue monthly monitoring of existing interim measures.
- Commence the evaluation of potential treatability studies for the corrective measures evaluation.

Additional Phase II RFI field tasks will be presented in task-specific Statements of Work (SOWs). Future SOWs will be based on the project schedule presented on Table 3 and on U.S. EPA comments to the Phase I RFI report.

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- Unconsolidated Unit Monitoring Well
- Sewer Backfill Monitoring Well
- Vernay Facility Boundary

220 110 0 220
Feet

N

DAYTON STREET
LIMESTONE STREET
WRIGHT STREET
GREEN STREET
SUNCREST DRIVE
E ENON
OMAR CIRCLE
BARBARA STREET
W S COLLEGE STREET
W N COLLEGE STREET
W C COLLEGE STREET

PLANT 3
PLANT 2
CW01-02
CW01-01

MW01-02
MW01-07
MW01-02CD
MW01-02SE
MW01-08
MW01-01
MW01-12
MW01-13
MW02-860 Dayton
MW01-09
MW01-05CD
MW01-05
RW01-05
MW01-11
MW01-06
MW01-10
MW01-14
MW01-04
MW01-03
MW01-03CD
MW01-04CD
MW01-04SE
MW02-12
MW02-17
MW02-17CD
MW02-11
MW02-11SE
MW02-759 Dayton Street
MW02-07
MW02-09
MW02-15
MW02-15CD
MW02-10
MW02-10CD
MW02-06
MW02-06CD
MW02-08
MW02-08CD
MW02-08SE
MW02-05
MW02-05CD
MW02-16
MW02-16CD
MW02-01
MW02-02
MW02-03
MW02-03CD
MW02-03SE
MW02-04
MW02-04CD
MW02-18
MW02-18CD
MW02-13
MW02-14
MW02-14CD

The Payne Firm, Inc.
Environmental Consultants
Cincinnati, Ohio

DATE	7/8/04
APPROVED BY	KDK
FIGURE NO.	1
DRAWN BY	ALH
PROJECT NO.	292.11.26

CLIENT: VERNAY LABORATORIES, INC.

TITLE: SECOND QUARTER 2004 SAMPLING LOCATIONS

REFERENCE: Greene County Auditors, Orthophotograph (1998); State Plane Coordinates from Woolpert Surveying, LLP, Dayton, Ohio (NAD83/NAVD88)

F:\Data\PFM\GIS\Vernay\GIS\2nd QTR (2004)\02-2004 SAMPLING LOCATIONS.mxd

TABLES

The Payne Firm, Inc.

Vernay Laboratories, Inc.

Plant 2/3 Facility
Yellow Springs, Ohio
Project No. 0292.11.26

TABLE 1: Ground Water Capture Treatment System (GWCTS) Sampling Results - Detected VOCs (results in micrograms per liter [µg/L])

Sample Date	Trichloroethene (TCE)				Tetrachloroethene (PCE)			
	Influent		Post Primary Vessel	System Effluent	Influent		Post Primary Vessel	System Effluent
	CW01-01	CW01-02			CW01-01	CW01-02		
3/20/2000	13	NI	ND	NS	55	NI	ND	NS
3/21/2000	27	NI	ND	NS	130	NI	ND	NS
3/27/2000	44	NI	ND	NS	300	NI	ND	NS
4/3/2000	34	NI	ND	NS	340	NI	ND	NS
4/10/2000	60	NI	ND	NS	690	NI	ND	NS
4/18/2000	59	NI	ND	ND	890	NI	ND	ND
5/2/2000	53	NI	ND	NS	910	NI	ND	NS
6/8/2000	63	NI	ND	NS	1,300	NI	ND	NS
7/10/2000	68	NI	ND	NS	1,700	NI	ND	NS
8/4/2000	48	NI	ND	NS	1,700	NI	ND	NS
9/15/2000	77	NI	ND	NS	1,300	NI	ND	NS
10/11/2000	72	NI	ND	NS	2,100	NI	ND	NS
11/2/2000	61	NI	ND	NS	1,500	NI	ND	NS
12/13/2000	82	NI	ND	ND	2,700	NI	ND	ND
1/9/2001	91	NI	ND	ND	1,700	NI	ND	ND
2/7/2001	81	NI	ND	ND	1,900	NI	ND	ND
3/9/2001	81	NI	ND	ND	1,300	NI	ND	ND
4/10/2001	69	NI	ND	ND	1,400	NI	ND	ND
5/2/2001	68	NI	ND	ND	1,600	NI	ND	ND
6/7/2001	83	NI	ND	ND	1,700	NI	ND	ND
7/11/2001	74	NI	ND	ND	1,600	NI	ND	ND
8/2/2001	74	NI	ND	ND	1,400	NI	ND	ND
9/10/2001	65	NI	ND	ND	1,400	NI	ND	ND
10/4/2001	CARBON VESSEL #1 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #2 BECOMES PRIMARY VESSEL; CARBON VESSEL #1 BECOMES SECONDARY VESSEL.							
10/11/2001	68	NI	ND	ND	1,400	NI	ND	ND
11/19/2001	56	NI	ND	ND	980	NI	ND	ND
12/13/2001	69	NI	ND	ND	1,300	NI	ND	ND
1/3/2002	59	NI	ND	ND	1,000	NI	ND	ND
2/7/2002	61	NI	ND	ND	1,200	NI	ND	ND
3/11/2002	69	NI	ND	ND	1,200	NI	ND	ND
4/3/2002	51	NI	ND	ND	970	NI	ND	ND
5/16/2002	48	NI	ND	ND	1,900	NI	ND	ND
6/11/2002[1]	52	NI	ND	ND	1,100	NI	ND	ND
6/28/2002	55	NI	ND	ND	1,100	NI	ND	ND
7/11/2002	CARBON VESSEL #2 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #1 BECOMES PRIMARY VESSEL; CARBON VESSEL #2 BECOMES SECONDARY VESSEL.							
7/11/2002	53	NI	ND	ND	1,400	NI	ND	ND
8/7/2002	46	NI	ND	ND	1,000	NI	ND	ND
9/5/2002	60	NI	ND	ND	1,200	NI	ND	ND
10/3/2002	61	NI	ND	ND	1,300	NI	ND	ND
11/6/2002	56	NI	ND	ND	1,100	NI	ND	ND
12/5/2002	61	NI	ND	ND	1,000	NI	ND	ND
1/13/2003	56	NI	ND	ND	990	NI	ND	ND
1/21/2003	COMMENCE PUMPING FROM CW01-02							
1/21/2003	NS	ND	NS	NS	NS	ND	NS	NS
2/5/2003	59	ND	ND	ND	1,100	ND	ND	ND
3/4/2003	ND	ND	ND	ND	18	ND	ND	ND
4/3/2003	51	ND	ND	ND	970	9	ND	ND
5/6/2003	53	ND	ND	ND	1,100	12	8	ND
5/29/2003	CARBON VESSEL #1 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #2 BECOMES PRIMARY VESSEL; CARBON VESSEL #1 BECOMES SECONDARY VESSEL.							
6/2/2003	50	ND	ND	ND	1,000	18	74	ND
7/10/2003	49	ND	ND	ND	960	20	ND	ND
8/1/2003	39	ND	ND	ND	970	27	ND	ND
9/15/2003	36	ND	ND	ND	1,100	28	ND	ND
10/6/2003	46	ND	ND	ND	890	29	ND	ND
11/3/2003	42	ND	6	ND	790	34	ND	ND
12/3/2003	47	ND	ND	ND	770	41	ND	ND
1/13/2004	43	ND	ND	ND	860	43	ND	ND
2/16/2004	42	ND	ND	ND	840	48	ND	ND
3/9/2004	42	ND	ND	ND	730	57	ND	ND
4/6/2004	43	ND	ND	ND	760	67	ND	ND
5/4/2004	41	ND	ND	ND	680	63	ND	ND
6/2/2004	CARBON VESSEL #2 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #1 BECOMES PRIMARY VESSEL; CARBON VESSEL #2 BECOMES SECONDARY VESSEL.							
6/7/2004	39	ND	ND	ND	690	70	ND	ND

NS = not sampled
ND = non detected at or above the laboratory's reporting limit (Qualified by STL, Inc.).
J = Estimated result; result concentration is below the laboratory's reporting limit (Qualified by STL, Inc.).
[1]The "Post Primary Vessel" and "System Effluent" samples collected on 6/11/02 were collected from the same location. A sample was mistakenly not collected after the second carbon vessel
Sample collected on 7/11/02 was collected after carbon vessel #2 was changed out.

The Payne Firm, Inc.

TABLE 1: Ground Water Capture Treatment System (GWCTS) Sampling Results - Detected VOCs (results in micrograms per liter [µg/L])

Sample Date	cis-1,2-Dichloroethene (cis-1,2-DCE)				Acetone			
	Influent		Post Primary Vessel	System Effluent	Influent		Post Primary Vessel	System Effluent
	CW01-01	CW01-02			CW01-01	CW01-02		
3/20/2000	ND	NI	ND	NS	ND	NI	ND	NS
3/21/2000	ND	NI	ND	NS	ND	NI	ND	NS
3/27/2000	ND	NI	ND	NS	ND	NI	ND	NS
4/3/2000	ND	NI	ND	NS	ND	NI	ND	NS
4/10/2000	ND	NI	ND	NS	ND	NI	ND	NS
4/18/2000	ND	NI	ND	ND	ND	NI	ND	ND
5/2/2000	ND	NI	ND	NS	ND	NI	ND	NS
6/8/2000	5	NI	ND	NS	ND	NI	ND	NS
7/10/2000	6	NI	ND	NS	ND	NI	ND	NS
8/4/2000	5	NI	ND	NS	79	NI	ND	NS
9/15/2000	12	NI	ND	NS	ND	NI	ND	NS
10/11/2000	11	NI	ND	NS	ND	NI	ND	NS
11/2/2000	11	NI	ND	NS	ND	NI	ND	NS
12/13/2000	ND	NI	ND	ND	ND	NI	ND	ND
1/9/2001	14	NI	ND	ND	ND	NI	ND	ND
2/7/2001	16	NI	ND	ND	ND	NI	ND	ND
3/9/2001	19	NI	ND	ND	ND	NI	ND	ND
4/10/2001	17	NI	ND	ND	ND	NI	ND	ND
5/2/2001	14	NI	ND	ND	ND	NI	ND	ND
6/7/2001	19	NI	5	ND	82	NI	ND	ND
7/11/2001	18	NI	ND	ND	ND	NI	ND	ND
8/2/2001	17	NI	9	ND	ND	NI	ND	ND
9/10/2001	16	NI	15	ND	ND	NI	ND	ND
10/4/2001	CARBON VESSEL #1 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #2 BECOMES PRIMARY VESSEL; CARBON VESSEL #1 BECOMES SECONDARY VESSEL.							
10/11/2001	17	NI	ND	ND	ND	NI	ND	ND
11/19/2001	14	NI	ND	ND	ND	NI	ND	ND
12/13/2001	17	NI	ND	ND	ND	NI	ND	ND
1/3/2002	14	NI	ND	ND	ND	NI	ND	ND
2/7/2002	14	NI	ND	ND	ND	NI	ND	ND
3/11/2002	23	NI	ND	ND	ND	NI	ND	ND
4/3/2002	13	NI	ND	ND	ND	NI	ND	ND
5/16/2002	14	NI	9	ND	ND	NI	ND	ND
6/11/2002[1]	17	NI	15	15	ND	NI	ND	ND
6/28/2002	16	NI	20	ND	ND	NI	ND	ND
7/11/2002	CARBON VESSEL #2 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #1 BECOMES PRIMARY VESSEL; CARBON VESSEL #2 BECOMES SECONDARY VESSEL.							
7/11/2002	15	NI	ND	ND	ND	NI	ND	ND
8/7/2002	15	NI	ND	ND	ND	NI	ND	ND
9/5/2002	17	NI	ND	ND	ND	NI	ND	ND
10/3/2002	16	NI	ND	ND	ND	NI	ND	ND
11/6/2002	15	NI	ND	ND	ND	NI	ND	ND
12/5/2002	17	NI	ND	ND	ND	NI	ND	ND
1/13/2003	15	NI	ND	ND	ND	NI	ND	ND
1/21/2003	COMMENCE PUMPING FROM CW01-02							
1/21/2003	NS	ND	NS	NS	NS	ND	NS	NS
2/5/2003	16	ND	ND	ND	ND	ND	ND	ND
3/4/2003	ND	ND	ND	ND	ND	ND	ND	ND
4/3/2003	19	ND	7	ND	ND	ND	ND	ND
5/6/2003	13	ND	10	ND	ND	ND	ND	ND
5/29/2003	CARBON VESSEL #1 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #2 BECOMES PRIMARY VESSEL; CARBON VESSEL #1 BECOMES SECONDARY VESSEL.							
6/2/2003	15	ND	ND	ND	ND	ND	ND	ND
7/10/2003	16	ND	ND	ND	ND	ND	ND	ND
8/1/2003	11	ND	ND	ND	ND	ND	ND	ND
9/15/2003	10	ND	10	ND	ND	ND	ND	ND
10/6/2003	13	ND	12	ND	ND	ND	ND	ND
11/3/2003	13	ND	14	ND	ND	ND	ND	ND
12/3/2003	14	ND	ND	ND	ND	ND	ND	ND
1/13/2004	12	ND	ND	ND	ND	ND	ND	ND
2/16/2004	12	ND	ND	ND	ND	ND	ND	ND
3/9/2004	12	ND	3	ND	ND	ND	ND	ND
4/6/2004	14	ND	6	ND	ND	ND	ND	ND
5/4/2004	12	ND	7	ND	ND	ND	ND	ND
6/2/2004	CARBON VESSEL #2 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #1 BECOMES PRIMARY VESSEL; CARBON VESSEL #2 BECOMES SECONDARY VESSEL.							
6/7/2004	11	ND	7	ND	ND	ND	ND	ND

NS = not sampled
ND = non detected at or above the laboratory's reporting limit (Qualified by STL, Inc.).
J = Estimated result; result concentration is below the laboratory's reporting limit (Qualified by STL, Inc.).
[1]The "Post Primary Vessel" and "System Effluent" samples collected on 6/11/02 were collected from the same location. A sample was mistakenly not collected after the second carbon vessel
Sample collected on 7/11/02 was collected after carbon vessel #2 was changed out.

The Payne Firm, Inc.

TABLE 1: Ground Water Capture Treatment System (GWCTS) Sampling Results - Detected VOCs (results in micrograms per liter [µg/L])

Sample Date	Methylene Chloride				1,1-Dichloroethane (1,1-DCA)			
	Influent		Post Primary Vessel	System Effluent	Influent		Post Primary Vessel	System Effluent
	CW01-01	CW01-02			CW01-01	CW01-02		
3/20/2000	ND	NI	ND	NS	ND	NI	ND	NS
3/21/2000	ND	NI	ND	NS	ND	NI	ND	NS
3/27/2000	ND	NI	ND	NS	ND	NI	ND	NS
4/3/2000	ND	NI	ND	NS	ND	NI	ND	NS
4/10/2000	ND	NI	ND	NS	ND	NI	ND	NS
4/18/2000	ND	NI	ND	ND	ND	NI	ND	ND
5/2/2000	ND	NI	ND	NS	ND	NI	ND	NS
6/8/2000	ND	NI	ND	NS	ND	NI	ND	NS
7/10/2000	ND	NI	ND	NS	ND	NI	ND	NS
8/4/2000	ND	NI	ND	NS	ND	NI	ND	NS
9/15/2000	ND	NI	ND	NS	ND	NI	ND	NS
10/11/2000	ND	NI	ND	NS	ND	NI	ND	NS
11/2/2000	ND	NI	ND	NS	ND	NI	ND	NS
12/13/2000	ND	NI	11	ND	ND	NI	ND	ND
1/9/2001	ND	NI	ND	ND	ND	NI	ND	ND
2/7/2001	ND	NI	ND	ND	ND	NI	ND	ND
3/9/2001	ND	NI	ND	ND	ND	NI	ND	ND
4/10/2001	ND	NI	ND	ND	ND	NI	ND	ND
5/2/2001	ND	NI	ND	ND	ND	NI	ND	ND
6/7/2001	ND	NI	ND	ND	ND	NI	ND	ND
7/11/2001	ND	NI	ND	ND	ND	NI	ND	ND
8/2/2001	ND	NI	ND	ND	ND	NI	ND	ND
9/10/2001	ND	NI	ND	ND	ND	NI	ND	ND
10/4/2001	CARBON VESSEL #1 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #2 BECOMES PRIMARY VESSEL; CARBON VESSEL #1 BECOMES SECONDARY VESSEL.							
10/11/2001	ND	NI	ND	ND	ND	NI	ND	ND
11/19/2001	ND	NI	ND	ND	ND	NI	ND	ND
12/13/2001	ND	NI	ND	ND	ND	NI	ND	ND
1/3/2002	ND	NI	ND	ND	ND	NI	ND	ND
2/7/2002	ND	NI	ND	ND	ND	NI	6	ND
3/11/2002	ND	NI	ND	ND	ND	NI	6	ND
4/3/2002	ND	NI	ND	ND	ND	NI	6	ND
5/16/2002	ND	NI	ND	ND	ND	NI	6	ND
6/11/2002[1]	ND	NI	ND	ND	ND	NI	6	6
6/28/2002	ND	NI	ND	ND	ND	NI	6	ND
7/11/2002	CARBON VESSEL #2 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #1 BECOMES PRIMARY VESSEL; CARBON VESSEL #2 BECOMES SECONDARY VESSEL.							
7/11/2002	ND	NI	ND	ND	ND	NI	ND	ND
8/7/2002	ND	NI	ND	ND	ND	NI	ND	ND
9/5/2002	ND	NI	ND	ND	ND	NI	ND	ND
10/3/2002	ND	NI	ND	ND	ND	NI	ND	ND
11/6/2002	ND	NI	ND	ND	ND	NI	ND	ND
12/5/2002	ND	NI	ND	ND	ND	NI	ND	ND
1/13/2003	ND	NI	ND	ND	ND	NI	ND	ND
1/21/2003	COMMENCE PUMPING FROM CW01-02							
1/21/2003	NS	ND	NS	NS	NS	ND	NS	NS
2/5/2003	ND	ND	ND	ND	ND	ND	ND	ND
3/4/2003	ND	ND	ND	ND	ND	ND	ND	ND
4/3/2003	ND	ND	ND	ND	ND	ND	ND	ND
5/6/2003	ND	ND	ND	ND	ND	ND	ND	ND
5/29/2003	CARBON VESSEL #1 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #2 BECOMES PRIMARY VESSEL; CARBON VESSEL #1 BECOMES SECONDARY VESSEL.							
6/2/2003	ND	ND	ND	ND	ND	ND	ND	ND
7/10/2003	ND	ND	ND	ND	ND	ND	ND	ND
8/1/2003	ND	ND	ND	ND	ND	ND	ND	ND
9/15/2003	ND	ND	ND	ND	ND	ND	ND	ND
10/6/2003	ND	ND	ND	ND	ND	ND	ND	ND
11/3/2003	ND	ND	ND	ND	ND	ND	ND	ND
12/3/2003	ND	ND	ND	ND	ND	ND	ND	ND
1/13/2004	ND	ND	ND	ND	ND	ND	ND	ND
2/16/2004	ND	ND	ND	ND	ND	ND	ND	ND
3/9/2004	ND	ND	ND	ND	ND	ND	ND	ND
4/6/2004	ND	ND	ND	ND	ND	ND	ND	ND
5/4/2004	ND	ND	ND	ND	ND	ND	ND	ND
6/2/2004	CARBON VESSEL #2 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #1 BECOMES PRIMARY VESSEL; CARBON VESSEL #2 BECOMES SECONDARY VESSEL.							
6/7/2004	ND	ND	ND	ND	ND	ND	ND	ND

NS = not sampled
ND = non detected at or above the laboratory's reporting limit (Qualified by STL, Inc.).
J = Estimated result; result concentration is below the laboratory's reporting limit (Qualified by STL, Inc.).
[1]The "Post Primary Vessel" and "System Effluent" samples collected on 6/11/02 were collected from the same location. A sample was mistakenly not collected after the second carbon vessel
Sample collected on 7/11/02 was collected after carbon vessel #2 was changed out.

The Payne Firm, Inc.

TABLE 1: Ground Water Capture Treatment System (GWCTS) Sampling Results - Detected VOCs (results in micrograms per liter [µg/L])

Sample Date	1,1,2-Trichloro-1,2,2-Trifluoroethane (Freon-113)			
	Influent		Post Primary Vessel	System Effluent
	CW01-01	CW01-02		
3/20/2000	49	NI	ND	NS
3/21/2000	110	NI	ND	NS
3/27/2000	250	NI	ND	NS
4/3/2000	ND	NI	ND	NS
4/10/2000	ND	NI	ND	NS
4/18/2000	570	NI	ND	ND
5/2/2000	470	NI	ND	NS
6/8/2000	1,300	NI	30	NS
7/10/2000	1,600	NI	170	NS
8/4/2000	2,800	NI	170	NS
9/15/2000	790	NI	ND	NS
10/11/2000	940	NI	89	NS
11/2/2000	1,500	NI	92	NS
12/13/2000	1,100	NI	120	ND
1/9/2001	630	NI	ND	ND
2/7/2001	520	NI	140	ND
3/9/2001	480	NI	150	ND
4/10/2001	640	NI	180	ND
5/2/2001	1,200	NI	380	ND
6/7/2001	1,600	NI	520	ND
7/11/2001	730	NI	ND	ND
8/2/2001	690	NI	390	ND
9/10/2001	660	NI	660	ND
10/4/2001	CARBON VESSEL #1 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #2 BECOMES PRIMARY VESSEL; CARBON VESSEL #1 BECOMES			
10/11/2001	920	NI	150	ND
11/19/2001	1,100	NI	430	ND
12/13/2001	840	NI	400	ND
1/3/2002	980	NI	620	ND
2/7/2002	660	NI	520	ND
3/11/2002	930	NI	820	ND
4/3/2002	950	NI	1,100	ND
5/16/2002	1,700	NI	1,500	ND
6/11/2002[1]	690	NI	960	970
6/28/2002	780	NI	1,100	49
7/11/2002	CARBON VESSEL #2 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #1 BECOMES PRIMARY VESSEL; CARBON VESSEL #2 BECOMES			
7/11/2002	1,100	NI	53	ND
8/7/2002	710	NI	50	ND
9/5/2002	720	NI	81	ND
10/3/2002	1,600	NI	280	ND
11/6/2002	730	NI	270	ND
12/5/2002	510	NI	320	ND
1/13/2003	600	NI	480	ND
1/21/2003	COMMENCE PUMPING FROM CW01-02			
1/21/2003	NS	ND	NS	NS
2/5/2003	550	ND	560	11
3/4/2003	9	ND	670	7
4/3/2003	510	ND	460	150
5/6/2003	760	ND	640	340
5/29/2003	CARBON VESSEL #1 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #2 BECOMES PRIMARY VESSEL; CARBON VESSEL #1 BECOMES			
6/2/2003	790	ND	410	ND
7/10/2003	670	ND	480	ND
8/1/2003	440	ND	460	ND
9/15/2003	800	ND	870	140
10/6/2003	820	ND	630	170
11/3/2003	720	ND	570	200
12/3/2003	780	ND	240	ND
1/13/2004	620	ND	490	ND
2/16/2004	570	ND	520	ND
3/9/2004	610	ND	520	25
4/6/2004	580	ND	610	640
5/4/2004	560	ND	470	ND
6/2/2004	CARBON VESSEL #2 CHANGED OUT AND REPLACED WITH REACTIVATED CARBON. CARBON VESSEL #1 BECOMES PRIMARY VESSEL; CARBON VESSEL #2 BECOMES			
6/7/2004	740	ND	250	ND

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ND = non detected at or above the laboratory's reporting limit (Qualified by STL, Inc.).
J = Estimated result; result concentration is below the laboratory's reporting limit (Qualified by STL, Inc.).
[1]The "Post Primary Vessel" and "System Effluent" samples collected on 6/11/02 were collected from the same location. A sample was mistakenly not collected after the second carbon vessel
Sample collected on 7/11/02 was collected after carbon vessel #2 was changed out.

The Payne Firm, Inc.

Vernay Laboratories, Inc.

Plant 2/3 Facility
Yellow Springs, Ohio
Project No. 0292.11.26

TABLE 2: Utility Tunnel Sump Water Treatment System (UTSWTS) Sampling Results - Detected VOCs (results in micrograms per liter [µg/L])

Sample Date	Vinyl Chloride			Acetone		
	Influent	Sump Intermediate	Effluent	Influent	Sump Intermediate	Effluent
7/18/2000	ND	NS	NS	ND	NS	ND
8/11/2000	CARBON DRUM INSTALLED					
10/11/2000	30	NS	ND	ND	NS	ND
11/21/2000	16	NS	ND	ND	NS	ND
12/13/2000	11	NS	ND	68	NS	ND
1/17/2001	NEW CARBON DRUM INSTALLED					
1/9/2001	ND	NS	ND	ND	NS	ND
2/7/2001	ND	NS	ND	330	NS	ND
2/28/2001	NEW CARBON DRUM INSTALLED					
3/9/2001	ND	NS	ND	120	NS	ND
4/10/2001	5	NS	ND	ND	NS	ND
5/2/2001	ND	NS	ND	ND	NS	ND
6/7/2001	ND	NS	ND	ND	NS	ND
7/11/2001	ND	NS	ND	ND	NS	ND
7/25/2001	NEW CARBON DRUM INSTALLED					
8/2/2001	ND	NS	ND	ND	NS	ND
9/10/2001	ND	NS	ND	ND	NS	ND
10/11/2001	12	NS	ND	ND	NS	ND
11/19/2001	5	NS	ND	ND	NS	ND
12/13/2001	4	NS	ND	ND	NS	ND
1/3/2002	ND	NS	ND	ND	NS	ND
2/6/2002	INSTALL SECOND CARBON DRUM TO SYSTEM (2 CARBON DRUM SYSTEM)					
2/7/2002	ND	ND	ND	ND	ND	ND
3/11/2002	ND	ND	ND	1400	ND	ND
4/3/2002	ND	ND	ND	ND	ND	ND
5/16/2002	ND	ND	ND	ND	ND	ND
6/11/2002	ND	ND	ND	ND	ND	ND
7/11/2002	ND	ND	ND	ND	ND	ND
8/7/2002	32	ND	ND	ND	ND	ND
9/5/2002	70	ND	ND	ND	ND	ND
10/3/2002	42	ND	ND	ND	ND	ND
10/18/2002	REPLACE SECOND CARBON VESSEL					
11/6/2002	120	8	ND	ND	ND	ND
12/5/2002	46	4 J	ND	ND	ND	ND
1/13/2003	ND	ND	ND	ND	ND	ND
2/5/2003	ND	ND	ND	ND	ND	ND
3/4/2003	ND	ND	ND	ND	ND	ND
4/3/2003	ND	ND	ND	ND	ND	ND
5/6/2003	ND	ND	ND	ND	ND	ND
6/2/2003	ND	ND	ND	ND	ND	ND
7/10/2003	ND	ND	ND	ND	ND	ND
8/1/2003	5	ND	ND	ND	ND	ND
9/15/2003	16	ND	ND	ND	ND	ND
10/6/2003	15	ND	ND	ND	ND	ND
11/3/2003	24	4	ND	ND	ND	ND
12/3/2003	6	ND	ND	ND	ND	ND
1/13/2004	6	ND	ND	ND	ND	ND
2/4/2004	ND	ND	ND	ND	ND	ND
3/9/2004	3	ND	ND	ND	ND	ND
4/6/2004	ND	ND	ND	ND	ND	ND
5/4/2004	ND	4	ND	100	ND	ND
6/7/2004	8	4	ND	130	ND	ND

NS = not sampled
ND = non detected at or above the laboratory's reporting limit (Qualified by STL, Inc.).
J = Estimated result; result concentration is below the laboratory's reporting limit (Qualified by STL, Inc.).

The Payne Firm, Inc.

TABLE 2: Utility Tunnel Sump Water Treatment System (UTSWTS) Sampling Results - Detected VOCs (results in micrograms per liter [µg/L])

Sample Date	trans-1,2-Dichloroethene (trans-1,2-DCE)			cis-1,2-Dichloroethene (cis-1,2-DCE)		
	Influent	Sump Intermediate	Effluent	Influent	Sump Intermediate	Effluent
7/18/2000	ND	NS	NS	290	NS	NS
8/11/2000	CARBON DRUM INSTALLED					
10/11/2000	18	NS	ND	660	NS	ND
11/21/2000	9	NS	ND	540	NS	ND
12/13/2000	12	NS	ND	710	NS	ND
1/17/2001	NEW CARBON DRUM INSTALLED					
1/9/2001	5	NS	ND	330	NS	ND
2/7/2001	ND	NS	ND	190	NS	ND
2/28/2001	NEW CARBON DRUM INSTALLED					
3/9/2001	ND	NS	ND	30	NS	ND
4/10/2001	ND	NS	ND	130	NS	ND
5/2/2001	ND	NS	ND	26	NS	ND
6/7/2001	ND	NS	ND	7	NS	ND
7/11/2001	ND	NS	ND	28	NS	7
7/25/2001	NEW CARBON DRUM INSTALLED					
8/2/2001	ND	NS	ND	ND	NS	ND
9/10/2001	ND	NS	ND	ND	NS	ND
10/11/2001	ND	NS	ND	72	NS	ND
11/19/2001	ND	NS	ND	36	NS	ND
12/13/2001	ND	NS	ND	14	NS	ND
1/3/2002	ND	NS	ND	ND	NS	ND
2/6/2002	INSTALL SECOND CARBON DRUM TO SYSTEM (2 CARBON DRUM SYSTEM)					
2/7/2002	ND	ND	ND	ND	ND	ND
3/11/2002	ND	ND	ND	ND	ND	ND
4/3/2002	ND	ND	ND	ND	ND	ND
5/16/2002	ND	ND	ND	ND	ND	ND
6/11/2002	ND	ND	ND	ND	ND	ND
7/11/2002	ND	ND	ND	ND	ND	ND
8/7/2002	6	ND	ND	330	ND	ND
9/5/2002	10	ND	ND	390	ND	ND
10/3/2002	6	ND	ND	410	ND	ND
10/18/2002	REPLACE SECOND CARBON VESSEL					
11/6/2002	16	ND	ND	800	5	ND
12/5/2002	ND	ND	ND	470	11	ND
1/13/2003	ND	ND	ND	35	ND	ND
2/5/2003	ND	ND	ND	58	ND	ND
3/4/2003	ND	ND	ND	25	ND	ND
4/3/2003	ND	ND	ND	33	ND	ND
5/6/2003	18	ND	ND	240	ND	ND
6/2/2003	ND	ND	ND	65	ND	ND
7/10/2003	ND	ND	ND	36	ND	ND
8/1/2003	ND	ND	ND	62	ND	ND
9/15/2003	6	ND	ND	230	ND	ND
10/6/2003	ND	ND	ND	170	ND	ND
11/3/2003	ND	ND	ND	210	ND	ND
12/3/2003	ND	ND	ND	98	ND	ND
1/13/2004	ND	ND	ND	110	ND	ND
2/4/2004	ND	ND	ND	110	ND	ND
3/9/2004	4	ND	ND	160	ND	ND
4/6/2004	ND	ND	ND	150	ND	ND
5/4/2004	ND	ND	ND	80	ND	ND
6/7/2004	ND	ND	ND	130	ND	ND

NS = not sampled
ND = non detected at or above the laboratory's reporting limit (Qualified by STL, Inc.).
J = Estimated result; result concentration is below the laboratory's reporting limit (Qualified by STL, Inc.).

The Payne Firm, Inc.

TABLE 2: Utility Tunnel Sump Water Treatment System (UTSWTS) Sampling Results - Detected VOCs (results in micrograms per liter [µg/L])

Sample Date	Trichloroethene (TCE)			Tetrachloroethene (PCE)		
	Influent	Sump Intermediate	Effluent	Influent	Sump Intermediate	Effluent
7/18/2000	90	NS	NS	83	NS	NS
8/11/2000	CARBON DRUM INSTALLED					
10/11/2000	130	NS	ND	120	NS	ND
11/21/2000	120	NS	ND	180	NS	ND
12/13/2000	140	NS	ND	170	NS	ND
1/17/2001	NEW CARBON DRUM INSTALLED					
1/9/2001	96	NS	ND	150	NS	ND
2/7/2001	36	NS	ND	55	NS	ND
2/28/2001	NEW CARBON DRUM INSTALLED					
3/9/2001	11	NS	ND	17	NS	ND
4/10/2001	32	NS	ND	37	NS	ND
5/2/2001	12	NS	ND	15	NS	ND
6/7/2001	7	NS	ND	5	NS	ND
7/11/2001	7	NS	ND	6	NS	ND
7/25/2001	NEW CARBON DRUM INSTALLED					
8/2/2001	ND	NS	ND	ND	NS	ND
9/10/2001	ND	NS	ND	ND	NS	ND
10/11/2001	ND	NS	ND	ND	NS	ND
11/19/2001	5	NS	ND	5	NS	ND
12/13/2001	6	NS	ND	5	NS	ND
1/3/2002	7	NS	ND	6	NS	ND
2/6/2002	INSTALL SECOND CARBON DRUM TO SYSTEM (2 CARBON DRUM SYSTEM)					
2/7/2002	7	ND	ND	ND	ND	ND
3/11/2002	6	ND	ND	ND	ND	ND
4/3/2002	7	ND	ND	5	ND	ND
5/16/2002	6	ND	ND	ND	ND	ND
6/11/2002	ND	ND	ND	ND	ND	ND
7/11/2002	9	ND	ND	ND	ND	ND
8/7/2002	15	ND	ND	11	ND	ND
9/5/2002	33	ND	ND	29	ND	ND
10/3/2002	16	ND	ND	16	ND	ND
10/18/2002	REPLACE SECOND CARBON VESSEL					
11/6/2002	22	ND	ND	22	ND	ND
12/5/2002	14	ND	ND	13	ND	ND
1/13/2003	ND	ND	ND	ND	ND	ND
2/5/2003	6	ND	ND	7	ND	ND
3/4/2003	ND	ND	ND	ND	ND	ND
4/3/2003	6	ND	ND	ND	ND	ND
5/6/2003	12	ND	ND	11	ND	ND
6/2/2003	6	ND	ND	5	ND	ND
7/10/2003	ND	ND	ND	ND	ND	ND
8/1/2003	6	ND	ND	ND	ND	ND
9/15/2003	26	ND	ND	15	ND	ND
10/6/2003	22	ND	ND	14	ND	ND
11/3/2003	27	ND	ND	25	ND	ND
12/3/2003	17	ND	ND	15	ND	ND
1/13/2004	18	ND	ND	11	ND	ND
2/4/2004	24	ND	ND	15	ND	ND
3/9/2004	25	ND	ND	17	ND	ND
4/6/2004	21	ND	ND	13	ND	ND
5/4/2004	16	ND	ND	11	ND	ND
6/7/2004	20	ND	ND	12	ND	ND

NS = not sampled
ND = non detected at or above the laboratory's reporting limit (Qualified by STL, Inc.).
J = Estimated result; result concentration is below the laboratory's reporting limit (Qualified by STL, Inc.).

The Payne Firm, Inc.

TABLE 2: Utility Tunnel Sump Water Treatment System (UTSWTS) Sampling Results - Detected VOCs
(results in micrograms per liter [µg/L])

Sample Date	1,1,2-Trichloro-1,2,2-Trifluoroethane (Freon-113)		
	Influent	Sump Intermediate	Effluent
7/18/2000	ND	NS	ND
8/11/2000	CARBON DRUM INSTALLED		
10/11/2000	ND	NS	ND
11/21/2000	ND	NS	ND
12/13/2000	17	NS	ND
1/17/2001	NEW CARBON DRUM INSTALLED		
1/9/2001	ND	NS	ND
2/7/2001	ND	NS	ND
2/28/2001	NEW CARBON DRUM INSTALLED		
3/9/2001	ND	NS	ND
4/10/2001	ND	NS	ND
5/2/2001	ND	NS	ND
6/7/2001	ND	NS	ND
7/11/2001	ND	NS	ND
7/25/2001	NEW CARBON DRUM INSTALLED		
8/2/2001	ND	NS	ND
9/10/2001	ND	NS	ND
10/11/2001	ND	NS	ND
11/19/2001	ND	NS	ND
12/13/2001	ND	NS	ND
1/3/2002	ND	NS	ND
2/6/2002	INSTALL SECOND CARBON DRUM TO SYSTEM (2 CARBON DRUM SYSTEM)		
2/7/2002	ND	ND	ND
3/11/2002	ND	ND	ND
4/3/2002	ND	ND	ND
5/16/2002	ND	ND	ND
6/11/2002	ND	ND	ND
7/11/2002	ND	ND	ND
8/7/2002	ND	ND	ND
9/5/2002	ND	ND	ND
10/3/2002	ND	ND	ND
10/18/2002	REPLACE SECOND CARBON VESSEL		
11/6/2002	ND	ND	ND
12/5/2002	ND	ND	ND
1/13/2003	ND	ND	ND
2/5/2003	ND	ND	ND
3/4/2003	ND	ND	ND
4/3/2003	ND	ND	ND
5/6/2003	ND	ND	ND
6/2/2003	ND	ND	ND
7/10/2003	ND	ND	ND
8/1/2003	ND	ND	ND
9/15/2003	ND	ND	ND
10/6/2003	ND	ND	ND
11/3/2003	ND	ND	ND
12/3/2003	ND	ND	ND
1/13/2004	ND	ND	ND
2/4/2004	ND	ND	ND
3/9/2004	ND	ND	ND
4/6/2004	ND	ND	ND
5/4/2004	ND	ND	ND
6/7/2004	ND	ND	ND

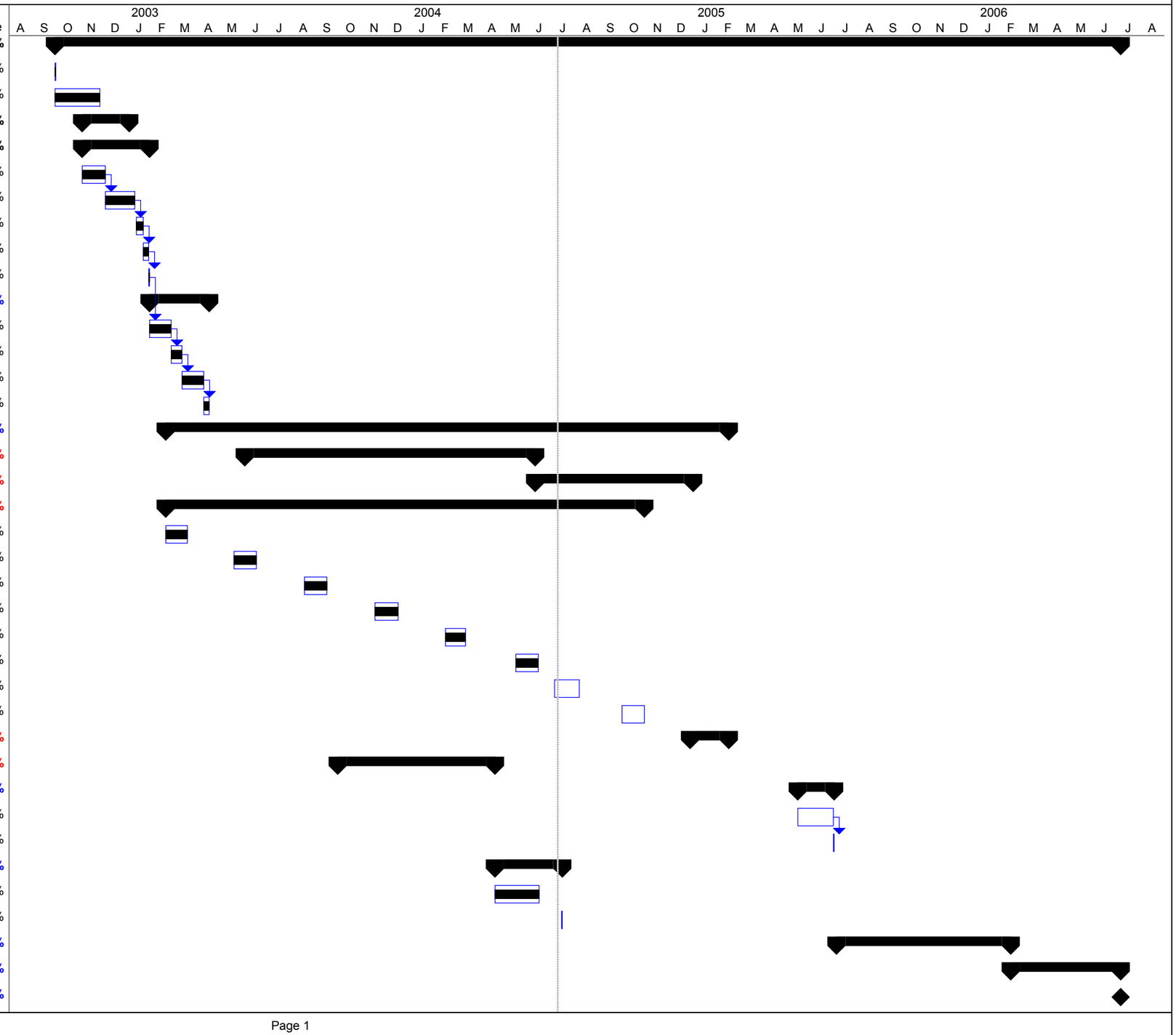
NS = not sampled
ND = non detected at or above the laboratory's reporting limit (Qualified by STL, Inc.).
J = Estimated result; result concentration is below the laboratory's reporting limit (Qualified by STL, Inc.).

Vernay Laboratories, Inc.
Project No. 0292.11.26
July 14, 2004

RCRA CORRECTIVE ACTION PROJECT SCHEDULE

Table 3: Project Schedule

ID	Task Name	% Complete
1	**RCRA CORRECTIVE ACTION PROJECT SCHEDULE**	**59%**
2	**1.0 CONSENT ORDER EFFECTIVE**	100%
3	**2.0 CURRENT CONDITIONS REPORT**	100%
4	**3.0 EI RISK SCOPING**	**100%**
7	**4.0 Ground Water Capture Interim Measure**	**100%**
8	Capture Zone Analysis	100%
9	Design/Planning of Additional Capture Wells	100%
10	Install/Develop Capture Well(s)	100%
11	Connect New Capture Wells to Existing System	100%
12	Capture Well Start-Up	100%
13	**5.0 SOIL HOT SPOT INTERIM MEASURE ASSESSMENT**	**100%**
14	Feasibility/Effectiveness Analysis	100%
15	System Design, if needed	100%
16	System Installation, if needed	100%
17	System Start-up, if needed	100%
18	**6.0 RCRA FACILITY INVESTIGATION**	**68%**
19	**6.1 Phase I: N&E in Cedarville Aquifer/Storm Sewer Backfill**	**100%**
41	**6.2 Phase II RFI**	**0%**
55	**6.3 Ground Water Monitoring**	**73%**
56	1st Quarter 2003	100%
57	2nd Quarter 2003	100%
58	3rd Quarter 2003	100%
59	4th Quarter 2003	100%
60	1st Quarter 2004	100%
61	2nd Quarter 2004	100%
62	3rd Quarter 2004	0%
63	4th Quarter 2004	0%
64	**6.5 Additional Soil Source Investigation**	**100%**
68	**6.6 EI Risk Data Needs**	**100%**
71	**7.0 EI REPORT FOR GROUND WATER**	**0%**
72	Prepare Report	0%
73	Submit EI Report to USEPA	0%
74	**8.0 EI REPORT FOR HUMAN HEALTH**	**98%**
75	Prepare Report	100%
76	Submit EI Report to USEPA	0%
77	**9.0 PROPOSE TO USEPA FINAL CORRECTIVE MEASURES**	**0%**
83	**10.0 USEPA SELECTS FINAL CORRECTIVE MEASURES**	**0%**
88	**11.0 IMPLEMENTATION OF FINAL CORRECTIVE MEASURES**	**0%**



APPENDICIES

APPENDIX I

CD-Rom Containing Adobe Acrobat® Documents:

A. **Second Quarter 2004 Progress Report (excluding laboratory analytical reports)**
B. **Second Quarter 2004 Laboratory Analytical Reports**