

# Five-Year Review Report

**Second Five-Year Review Report  
For the  
Coleman Operable Unit of the 29<sup>th</sup> and Mead Site  
Wichita  
Sedgwick County, Kansas**

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## **TABLE OF CONTENTS**

List of Acronyms  
Executive Summary  
Five-Year Review Summary Form

<b><u>Section</u></b>	<b><u>Page</u></b>
1.0 INTRODUCTION .....	1
2.0 SITE CHRONOLOGY .....	2
2.1 Administrative Events.....	2
2.2 Groundwater Remedial System .....	2
2.3 Soil Vapor Extraction System.....	3
3.0 SITE BACKGROUND.....	3
3.1 Physical Characteristics .....	3
3.2 Land and Resource Use .....	4
3.3 History of Contamination .....	4
3.4 Initial Response.....	5
3.5 Contaminants .....	6
4.0 REMEDIAL ACTIONS.....	6
4.1 Remedy Selection .....	6
4.1.1 Soil Remedy.....	6
4.1.2 Groundwater Remedy .....	7
4.2 Remedy Implementation.....	7
4.2.1 Soil Remedy.....	8
4.2.2 Groundwater Remedy .....	8
4.3 Systems Operations/Operation and Maintenance .....	8
4.3.1 Soil Remedy.....	8
4.3.2 Groundwater Remedy .....	9
5.0 PROGRESS SINCE THE LAST REVIEW .....	11
6.0 FIVE-YEAR REVIEW PROCESS.....	11
6.1 Administrative Components .....	11
6.2 Community Involvement .....	12
6.3 Documents Review .....	12
6.4 Data Review.....	12
6.4.1 SVE System .....	12
6.4.2 Groundwater Remedial System .....	13

6.5 Site Inspection .....	13
6.6 Interviews .....	13
7.0 ASSESSMENT .....	14
8.0 ISSUES.....	15
9.0 RECOMMENDATIONS AND FOLLOW-UP ACTIONS .....	16
10.0 PROTECTIVENESS STATEMENT .....	16
11.0 NEXT REVIEW .....	16
12.0 OTHER COMMENTS .....	16

## **TABLES**

Table 1	Sump Area Flow and VOC Data
Table 2a	System Evaluation for North Treatment System
Table 2b	System Evaluation for South Treatment System
Table 3	Comparison of Detections of Trichloroethylene in Groundwater Samples Point of Compliance Wells
Table 4	Recommendations and Follow-up Actions

## **FIGURES**

Figure 1	Site Location Map
Figure 2	Coleman Operable Unit Site Map
Figure 3	Sumps 1, 2, and 3 VEWs and VMPs
Figure 4	Sumps 4, 5, 6, and 7 VEWs and VMPs
Figure 5	Sump 8 VEWs and VMPs
Figure 6	Sump 9 VEWs and VMPs
Figure 7	South Field VEWs and VMPs
Figure 8	Locations of Monitoring Wells
Figure 9	Groundwater Flow Direction Map – November 2004
Figure 10	Shallow TCE Isoconcentration Map
Figure 11	Deep TCE Isoconcentration Map
Figure 12	Total VOCs MW-71D/MW-71S, Time Series Graphs
Figure 13	RW-1, Time Series Graphs
Figure 14	RW-2, Time Series Graphs
Figure 15	Southfield SVE System Table (Through June, 2010)
Figure 16	Locations of Monitoring Wells for Groundwater Monitoring & Point of Compliance Programs
Figure 17	Groundwater Flow Direction Map-April 2010
Figure 18	Shallow TCE Isoconcentration Map, Data Collected April 2010
Figure 19	Deep TCE Isoconcentration Map, Data Collected April 2010

## **ATTACHMENTS**

Attachment 1	Documents Reviewed
Attachment 2	Site Inspection Checklist

## **List of Abbreviations and Acronyms**

ARARs	Applicable or Relevant and Appropriate Requirements
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
DCE	Dichloroethene
EPA	Environmental Protection Agency
gpm	Gallons per Minute
GTI	Groundwater Technology, Inc.
KDHE	Kansas Department of Health and Environment
MCLs	Maximum Contaminant Levels
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
ND	Nondetect
NIC	North Industrial Corridor
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O&M	Operation and Maintenance
OU	Operable Unit
ppb	Parts Per Billion
PCE	Tetrachloroethylene
PRP	Potentially Responsible Party
RD/RA	Remedial Design/Remedial Action
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
SVE	Soil Vapor Extraction
TCA	Trichloroethane
TCE	Trichloroethylene
mg/kg	Milligrams per Kilogram
mg/L	Milligrams per Liter
$\mu\text{g}/\text{kg}$	Micrograms per Kilogram
$\mu\text{g}/\text{L}$	Micrograms per Liter
VOC	Volatile Organic Compound

## **Executive Summary**

The second five-year review of the Coleman Operable Unit (OU) of the 29<sup>th</sup> and Mead Superfund site in Wichita, Kansas, was completed in September 2010. The results of the five-year review indicate that the remedy is protective of human health and the environment. The remedy consists of groundwater extraction and treatment, groundwater monitoring, and soil vapor extraction (SVE). The semiannual groundwater monitoring program was implemented to evaluate contaminant concentration and hydraulic control. The SVE remediation remains at one source area. Nine other source areas have been closed as a result of the SVE remediation. The trigger for this five-year review was the completion of the first five-year review in September 2005.

The assessment of this five-year review found that the remedy continues to be operated and maintained in accordance with the requirements of the Record of Decision. The remedy has been functioning as designed. The SVE remediation remains at one source area. Nine source areas have been closed as a result of the SVE remediation. A study of the groundwater remedy was completed following the recommendation in the first five-year review. One extraction well and air stripper were shut down as a result of the study. The current groundwater remedy (extraction and treatment of contaminated groundwater) will be part of the final area-wide groundwater remedy for the North Industrial Corridor site (NIC) (which includes the 29<sup>th</sup> and Mead site) by eventually restoring the groundwater to acceptable quality (Safe Drinking Water Act Maximum Contaminant Levels Maximum). The Feasibility Study for the NIC site is under review by the Kansas Department of Health and Environment (KDHE). Additional remedial action steps will be necessary to address the groundwater plume that is beyond the limits of the Coleman OU. The soil remedy is further reducing the threat of continued contamination of the groundwater from the remaining soil source.

**Recommendations for the Coleman OU include:** (1) a review of the groundwater remedy will be needed when a decision document is finalized by KDHE and a remedial action is determined for the NIC site, (2) continue the groundwater monitoring compliance program to confirm hydraulic control of the groundwater contaminant plume, (3) continue collection of the SVE systems performance data to evaluate system operation, and (4) continue collection of air stripper performance data to evaluate percent removal and the air emission rates of the treatment system.



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**Deficiencies:** There were no deficiencies.

**Recommendations and Follow-up Actions:**

Actions needed to ensure protectiveness maintained in the future are as follows:

Continue the semiannual groundwater monitoring program to assure hydraulic containment of volatile organic compound contamination.

Continue to collect air stripper performance data to evaluate percent removal and air emission rates for the treatment systems.

Conduct an evaluation of the soil vapor extraction system to determine if continued operation is appropriate.

**Protectiveness Statement(s):**

The remedy at the Coleman Operable Unit of the 29<sup>th</sup> and Mead Superfund site is protective of human health and the environment through removal of soil volatile organic compound contamination by the soil vapor extraction system and hydraulic containment of groundwater contamination by the groundwater remedial system.

Long-term protectiveness of the remedial action will be verified by groundwater sampling to verify hydraulic containment by the groundwater remediation system. Current monitoring data indicate that the soil vapor extraction system continues to remove soil contamination.

**Other Comments:**

## **1.0 INTRODUCTION**

The U.S. Environmental Protection Agency (EPA) has conducted the second five-year review for the remedial actions implemented at the Coleman Operable Unit (OU) of the 29<sup>th</sup> and Mead Superfund site in Wichita, Kansas. This review covers the period of time from September 2005 to September 2010. This report documents the results of the review.

The purpose of the five-year review is to determine whether the remedy at the site is protective of human health and the environment. The methods, findings, and conclusions of the reviews are documented in five-year review reports. In addition, five-year review reports identify deficiencies found during the review, if any, and recommendations to address them.

This five-year review is required by statute. EPA must implement five-year reviews consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). CERCLA §121(c), as amended, states:

If the President selects a remedial action that results in any hazardous substances, pollutants or contaminants remaining at the site, the President shall review such remedial action no less often than every five years after the initiation of such remedial action to assure that human health and the environment are being protected by the remedial action being implemented.

The NCP, Part 300.400(f)(4)(ii) of the Code of Federal Regulations (CFR) states:

If a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years after the initiation of the selected remedial action.

This is the second five-year review for the Coleman OU of the 29<sup>th</sup> and Mead Superfund site in Wichita, Kansas. The triggering action for this statutory review is the date of the first five-year review of September 2005. The Coleman OU of the 29<sup>th</sup> and Mead Superfund site in Wichita, Kansas, meets the requirements for a statutory five-year review because hazardous substances, pollutants, and contaminants may remain on-site above levels that allow for unlimited use and unrestricted exposure.

The 29<sup>th</sup> and Mead Superfund site in Wichita, Kansas, consists of two OUs: (1) the General Area OU, and (2) the Coleman OU. The Kansas Department of Health and Environment (KDHE) is the lead agency for the General Area OU. EPA is the lead agency for the Coleman OU. Separate five-year reviews will be conducted for the General Area OU which continues to be in the Remedial Investigation/Feasibility Study (RI/FS) stage.

## **2.0 SITE CHRONOLOGY**

The chronology of events for the Coleman OU of the 29<sup>th</sup> and Mead Superfund site is provided in the following tables.

### **2.1 Administrative Events**

<b>Date</b>	<b>Event</b>
September 29, 1992	Record of Decision for Coleman OU signed
February 18, 1994	Consent Decree for Remedial Design/Remedial Action entered

### **2.2 Groundwater Remediation System**

<b>Date</b>	<b>Event</b>
January 22, 1996	Remedial Design Work Plan approved
May 3, 1996	Pre-final Remedial Design submitted
August 3, 1996	Pre-final Remedial Design and Remedial Action Work Plan approved
August 21, 1996	Final Remedial Design submitted
October 14, 1996	Installation of RW-2 completed
October 17, 1996	Well development of RW-2 completed
October 18, 1996	Installation of transfer line piping
October 28, 1996	Air stripper modifications completed
October 30, 1996	Installation of well pump and plumbing
March 21, 1997	Final system inspection
April 1997	System startup

### **2.3 Soil Vapor Extraction System**

<b>Date</b>	<b>Event</b>
October 7, 1997	Remedial Design Work Plan submitted
October 21, 1997	Remedial Design for Work Plan approved
March 12, 1999	Pre-final Remedial Design and Remedial Action Work Plan submitted
July 6, 1999	Pre-final Remedial Design and Remedial Action Work Plan approved
August 18, 1999	EPA approval of final Remedial Design/Remedial Action Work Plan and EPA notice to proceed
March 9, 2000	Initiate construction of Soil Vapor Extraction system
April 3, 2000	Complete construction for Soil Vapor Extraction system
May 4, 2000	Final system inspection
May 15, 2000	Soil Vapor Extraction system startup
Ongoing	Soil Vapor Extraction system monitoring

### **3.0 SITE BACKGROUND**

#### **3.1 Physical Characteristics**

The Coleman OU is located within the north-central part of the 29<sup>th</sup> and Mead Superfund site, a 1,440-acre industrial area in north-central Wichita, Kansas (see Figure 1). The Coleman OU is occupied by York UPG, Inc., at 801 East 37<sup>th</sup> Street north and by Recreational Vehicle Products, Inc. (RV Products), located at 3010 North Mead Street (see Figure 2). The southern boundary of the Coleman OU is approximately 300 feet south of East 30<sup>th</sup> Street north.

The Coleman OU lies within the Arkansas River lowlands section of the central lowlands Physiographic Province, which is characterized as relatively flat. Unconsolidated deposits underlying the Coleman OU are approximately 40 feet in depth and consist of clay, silt, sand, and gravel. These deposits represent at least four major depositional episodes, which range in age from the Early Pleistocene to Recent Alluvium. The Wellington Formation, which comprises the impermeable bed beneath the unconsolidated deposits, consists of calcareous gray and blue shale containing several thin beds of argillaceous limestone, gypsum, and anhydride.

These unconsolidated deposits are the primary source of usable groundwater in Sedgwick County. The direction of groundwater flow in the unconsolidated materials is generally south, although there are local variations caused by the pumping of a recovery well and several

industrial wells currently operating on the Coleman OU. Each industrial well has an average pumping rate of approximately 250 gallons per minute (gpm), and one of the wells must always be in operation to support York operations. Groundwater flow velocity is estimated at 340 feet per year.

### **3.2 Land and Resource Use**

The Coleman OU is located in an area which has been used primarily for industrial purposes since 1887. Various operations at the Coleman OU property prior to Coleman's occupation of the property include the manufacture of railway cars, automobiles, light aircraft, and electronically controlled aircraft. Coleman acquired the property in 1947 from the Trustee of Culver Aircraft Corporation through a bankruptcy proceeding. Coleman initiated the manufacture of household furnace and air conditioning units at the Coleman OU property in 1949.

York purchased the northern part of the Coleman OU property in 1995 and is the current owner/operator of these facilities. York operations include the production of consumer furnaces and air conditioning systems intended for use in conventional residences and manufactured homes. The remainder of the Coleman property was purchased in 1987 by RV Products which manufactures air conditioners for recreational vehicles. York occupies the former Coleman Heating, Ventilation, and Air Conditioning facility which includes a manufacturing plant (North Plant) that occupies approximately 60 percent of the Coleman OU and an Administration and Engineering (A&E) building which occupies approximately 30 percent of the Coleman OU. The remaining 10 percent of the Coleman OU area is occupied by RV Products.

The Coleman OU is surrounded by other industrial facilities such as a cardboard box manufacturer, a meat packing facility, a structural concrete manufacturer, grain elevators, a chemical manufacturing company, a railroad track, a petroleum products packaging facility, and the location of a former metals fabricating company.

### **3.3 History of Contamination**

EPA, the United States Geological Survey, and KDHE began investigating groundwater contamination in the 29<sup>th</sup> and Mead area in 1983. These investigations revealed the presence of several volatile organic compounds (VOCs) including trichloroethylene (TCE); carbon tetrachloride; toluene; benzene; ethylbenzene; methylene chloride; trans and/or cis-1,2-dichloroethylene; vinyl chloride; and 1,1,1-trichloroethane (TCA) in the groundwater at the 29<sup>th</sup> and Mead site. In May 1987, several water samples were collected at the Coleman facility from the effluent of cooling water from two on-site industrial water wells. The results of this sampling indicated elevated levels of several VOCs which included TCE; TCA; and 1,1-dichloroethene. These results prompted an investigation at the Coleman OU to determine the source, magnitude, and extent of these contaminants. Successive investigations conducted between 1987 and 1988 which included monitoring well installation and sampling, soil gas surveys, aquifer tests, and pilot tests indicated several potential source areas for VOC contamination existed at the Coleman facility.

### **3.4 Initial Response**

In 1988, Coleman and KDHE agreed that a groundwater recovery and treatment program and a soil vapor extraction (SVE) program should be designed and implemented to control further migration of contaminants from the Coleman OU property. This system became operational in 1988 and included a 62-point SVE system to treat contaminated soils in a 65,000-square foot area and a groundwater recovery and treatment system that currently utilizes two 40-foot by 4-foot diameter air strippers. Water from the system subsequent to treatment is discharged to the Wichita Drainage Canal in conformance with a National Pollutant Discharge Elimination System (NPDES) permit that was issued by KDHE.

The 29<sup>th</sup> and Mead Superfund site, which includes the entire Coleman facility, was officially listed on the Superfund National Priorities List (NPL) on February 21, 1990. The Coleman Company was identified as one of the potentially responsible parties (PRPs) for the 29<sup>th</sup> and Mead Superfund site. The Coleman Company and Evcon Industries asked KDHE and EPA to consider the area covered by the interim groundwater and SVE system as an OU within the 29<sup>th</sup> and Mead Superfund site since an interim recovery system was operational prior to the 1990 NPL listing. An OU is any action taken within an area of a site as one part of an overall site cleanup. On June 6, 1991, a Consent Agreement was signed between KDHE and the Coleman Company requiring an RI/FS at the Coleman OU.

In 1994, the city of Wichita filed a petition requesting that EPA reopen the record for the NPL listing process. EPA initially denied the city's petition. However, because the city had demonstrated its ability to organize a response action at the Gilbert and Mosley site, a state deferral demonstration project, EPA decided in April 1995 to remove the 29<sup>th</sup> and Mead site from the NPL. This action was on the condition that the city and KDHE enter into an agreement requiring the city to ensure cleanup of the site. The city and KDHE signed an order in October 1995 in which the city agreed to be responsible for site investigation and cleanup. The boundaries of the site were expanded to include additional source areas, and the site was renamed as the North Industrial Corridor (NIC). The deletion of the site from the NPL was proposed (61 *Fed. Reg.* 3365) and the comment period closed on March 1, 1996. The site was delisted from the NPL by *Federal Notice* dated April 29, 1996, (61 *Fed. Reg.* 18684) with an effective delisting date of April 29, 1996.

The 29<sup>th</sup> and Mead groundwater area-wide site is in the investigation phase and area-wide cleanup activities have not been initiated. The city has procured a contractor to complete the RI/FS for the expanded site area, and the RI/FS work plan was approved by KDHE on November 11, 1997. Several facilities within the 29<sup>th</sup> and Mead site have had releases to the groundwater. At this time, KDHE is reviewing a FS for the expanded site referred to as NIC.

A Record of Decision (ROD) for the Coleman OU portion of the 29<sup>th</sup> and Mead site was signed by EPA in 1992 which called for an interim action to augment the existing groundwater pump and treat system and a final action to expand an existing SVE system to address the soil contamination. These actions address only the Coleman OU portion of the 29<sup>th</sup> and Mead site. EPA negotiated a judicial Consent Decree with the PRPs, which include the Coleman Company,

Inc.; Evcon, Inc.; and Recreational Vehicle Products, Inc. The Consent Decree was entered in the Federal District Court for the district of Kansas in February 1994. EPA is the lead agency for the Coleman OU.

### **3.5 Contaminants**

Soil samples were collected from seven active or inactive degreaser pits and from the north and south fields of the Coleman OU property to evaluate potential source areas at the Coleman OU. Results indicate that TCE was detected in 23 soil borings from eight source areas. Concentrations of TCE in the soil ranged from nondetected (ND) to 13,000 micrograms per kilogram (ug/kg) or parts per billion (ppb). Other significant VOC constituents detected during the soil sampling program and their respective concentration range includes: 1,1,1 TCA - ND to 6,100 ug/kg; tetrachloroethene (PCE) - ND to 41 ug/kg; cis-1,2-dichloroethene (1,2 DCE) - ND to 520 ug/kg; 1,1 dichloroethene (1,1 DCE) - ND to 370 ug/kg; and toluene -ND to 140,000 ug/kg. These data suggest that former degreaser pits 1, 2, 3, 4, 6, 7, and 8 and the south field are likely sources for TCE contamination. In addition, significant concentrations of TCA were observed in former degreaser pits 1, 2, and 4.

Groundwater samples at the Coleman OU have been collected during several sampling events. In May 1990, a total of 68 monitoring wells were sampled for VOCs. As part of the RI, 35 monitoring wells were resampled to verify previous results. Analytical results indicate that TCE is the predominant VOC detected at the Coleman OU. TCE was detected in 32 of 35 monitoring wells sampled during the July 1991 sampling event. Concentrations of TCE ranged from ND to 15,000 micrograms per liter (ug/l). Other significant VOCs detected during the groundwater sampling program and their respective concentration ranges include: TCA - ND to 3,500 ug/l; PCE - ND to 100 ug/l; 1,2 DCE - ND to 2,500 ug/l; 1,1 DCE - ND to 1,110 ug/l; and vinyl chloride - ND to 250 ug/l.

## **4.0 REMEDIAL ACTIONS**

### **4.1 Remedy Selection**

The selected remedy is a combination of the previously existing groundwater system with an additional recovery well and expanded SVE system. Under this remedy, the existing groundwater and soil system, which consists of two industrial wells, one recovery well, two air strippers, and the 62-point SVE system installed in 1988, has continued to operate. The ROD required an expansion of the existing SVE system for removal of VOCs from unsaturated soils in all known on-site source areas. In addition, the ROD required the installation of a recovery well along the southern boundary to enhance hydraulic control.

#### **4.1.1 Soil Remedy**

The selected remedy is the final remedy with respect to the soil at the Coleman OU. The soil remediation system installed in 1988, which consists of a 62-point SVE system, was incorporated into the final soil remedy. The SVE system was expanded for removal of VOCs

from unsaturated soils in all known on-site source areas. Estimates indicate that this alternative would remove VOCs from over 4,000,000 cubic feet of contaminated soil. The ROD required the construction of a SVE system consisting of 96 SVE points to be screened from approximately 5 to 20 feet below ground surface. Based upon the SVE pilot study, approximately eight blowers were needed to implement this alternative. Air monitoring is required to ensure the health and safety of on-site personnel and to ensure that vapors released from the SVE system do not pose a threat to human health or the environment.

#### **4.1.2 Groundwater Remedy**

The selected remedy represents an interim remedy with respect to the groundwater at the Coleman OU. Because the plume of contaminated groundwater at the Coleman OU has merged with the contaminated groundwater from other sources in the 29<sup>th</sup> and Mead site, the final remedy for the 29<sup>th</sup> and Mead site will include the groundwater remedy at the Coleman OU. The existing groundwater system in place at the time of the remedy selection for the OU was incorporated into the remedy; that system consisted of two industrial wells, one recovery well, and two air strippers. An additional recovery well was located along the southern boundary to enhance hydraulic control. The additional recovery well was installed in the same manner as the existing recovery wells and operates at approximately 200 gpm. Water is pumped to an existing on-site air stripper. Treated water is monitored through an NPDES permit prior to discharge. The estimated operating life of this alternative is 18 years. The enhanced pumping system at the southern boundary, in conjunction with the existing pumping system, was designed to help prevent off-site migration of VOCs over the long term through hydraulic control. In addition, the overall load of VOCs leaching into the groundwater from active source areas has been greatly reduced by the SVE system.

The selected remedy described in the ROD for the Coleman OU was designed to address the principal threat posed by the contaminants in the groundwater by preventing the further migration of contaminants off the OU onto the 29<sup>th</sup> and Mead site and by eventually restoring the groundwater to acceptable quality (Safe Drinking Water Act Maximum Contaminant Levels [MCLs]) by the extraction and treatment of contaminated groundwater. The remedy has further reduced the threat of continued contamination of the groundwater from the soil source areas with the expansion of the SVE system.

#### **4.2 Remedy Implementation**

A Consent Order between EPA and Evcon Industries, Inc.; New Coleman Holdings, Inc.; and Recreational Vehicle Products, Inc., for the Remedial Design/Remedial Action (RD/RA) was executed on February 17, 1993. An RD was developed for both the soil and groundwater remedies. The final RD for the interim groundwater remedy is dated May 3, 1996; and the final design for the soil remedy is dated August 5, 1999.

#### **4.2.1 Soil Vapor Extraction System**

Construction of the SVE system was initiated on March 9, 2000, and completed on May 3, 2000. The locations of the SVE system are presented in Figures 3 through 7. The system was started on May 15, 2000, and operation is ongoing with performance presented in Table 1.

#### **4.2.2 Groundwater Remedial System**

The installation of the groundwater recovery well RW-2 was completed on October 14, 1996 (Figure 8). The well is six inches in diameter, and the screened interval of the well extends from 21 to 41 feet below ground surface. The recovery well was developed using a surge block, bailing, and over pumping. Installation of the recovery well pump, vault, flowmeter, and well head plumbing was completed on October 30, 1996. Groundwater transfer line piping was installed and pressure tested. The existing air stripper blower was modified by changing blower sheaves and belts and installing a larger nozzle. Discharge piping from the air stripper to the effluent discharge was changed to accommodate the increased flow rate.

The system startup was in April 1997. RW-2 operates at a pumping rate of approximately 90 gpm, and the effluent is pumped to air stripper AS-2 at the A&E building. The treated effluent water gravity flows to the Wichita Drainage Canal under an NPDES permit. The groundwater recovery systems are designed to run continuously unless shutdown by a pump control interlock condition generated by a pressure switch or a power failure.

### **4.3 Systems Operations/Operation and Maintenance**

#### **4.3.1 Soil Vapor Extraction System**

An operations and maintenance (O&M) plan for the SVE system was prepared by Fluor Daniel Ground Water Technology, Inc. (GTI). The O&M manual includes a description of tasks for O&M, prescribed treatment or operation conditions, and a schedule for each O&M task. A description of corrective action to be implemented in the event that cleanup or performance is exceeded was included in the O&M plan. Monitoring activities will involve data collection to evaluate VOC effluent concentration and remedial progress. VOC effluent concentration data were collected at system startup and were collected weekly for one month and quarterly thereafter. System balancing and adjustments will be ongoing as conditions change during monitoring inspections.

Performance monitoring activities involve data collection to evaluate VOC effluent concentrations and removal of VOCs from the soil by collecting air samples from the SVE exhaust. Air emissions and air flow data are collected and reported to EPA in the Quarterly Update Reports of RD/RA Activities. A total of 4,185 pounds of VOCs have been removed from contaminated soils by the SVE system from May 17, 2000, through October 4, 2004. The SVE system performance is provided in Table 1.

Following the first five-year review, the SVE systems designated for Sumps 1 through 9 were determined to have reached their operable life by shutting them down, restarting, and checking for rebound and then taking soil samples to verify that the RD objectives were met. The systems were decommissioned in June 2006. The combined total VOCs removed from those sumps by the SVE systems were calculated to be 2,145 pounds.

The SVE system as designated Southfield continues to be operated and as of June 2010 has removed 2,250 pounds of VOCs (Figure 15).

#### **4.3.2 Groundwater Remedial System**

An O&M manual for the interim groundwater remedy was prepared by Fluor Daniel GTI. Under normal operating conditions, the system operating tasks are limited to equipment maintenance and monitoring tasks. Facility personnel confirm systems operation on a daily basis.

A groundwater compliance program was developed and is described in the RD/RA Ground Water Monitoring Plan dated May 3, 1996. The purpose of the groundwater monitoring compliance program is to confirm hydraulic control of the groundwater contaminant plume at the Coleman OU. The compliance monitoring program consists of two procedures for confirming hydraulic control of the groundwater contaminant plume. The first procedure is the evaluation of water elevation data on and near the Coleman OU to verify the direction of groundwater flow and the extent of hydraulic control exerted by the operating recovery wells. The second procedure consists of the collection of groundwater quality data from a specified point of compliance wells and statistical assessment of the groundwater quality data to evaluate the effectiveness of the hydraulic control systems.

Groundwater monitoring is conducted on a semiannual basis utilizing 46 groundwater wells (Figure 8). Groundwater elevations are measured for all wells, and samples from selected monitoring wells are analyzed for chlorinated VOCs and toluene. The groundwater elevation data are compiled and flowlines are generated to show the direction of groundwater flow and the influence of the groundwater remediation system (Figure 9). The shallow and deep concentrations of TCE are shown in Figures 10 and 11.

Air emissions are monitored from the air stripper towers twice yearly during groundwater sampling events, and the air samples are analyzed for VOCs. Influent and effluent water samples from the air stripper towers are collected and analyzed for VOCs to determine the removal efficiency of VOCs from the groundwater. Groundwater effluent samples are collected on a monthly basis from both air stripper towers for VOCs as required in the monitoring requirements specified in the NPDES permit. Data contained in the Quarterly Update Report of RD/RA Activities dated January 17, 2005, demonstrated that the groundwater treatment systems are operating at 100 percent efficiency for the removal of VOCs from the influent (Tables 2a and 2b).

The PRP submitted annual groundwater monitoring reports to EPA to document hydraulic control of the groundwater at the Coleman OU. The most recent annual groundwater compliance monitoring report available for the first five-year review was dated April 5, 2001. This report contains water elevation data to verify the direction of groundwater flow and the extent of hydraulic control by the operating recovery wells. This report also contained a statistical assessment of groundwater data. The evaluation of the annual groundwater data in that report demonstrated that:

1. Hydraulic control continues to be achieved at the Coleman OU. RW-2 continues to enhance the groundwater containment at the Coleman OU.
2. The formal trend statistical analysis performed on the analytical data for the point of compliance wells indicates statistically significant downward trends for all but three monitoring wells.
3. Time-series graphs of the point of compliance monitoring well concentration data show that monitoring wells with statistically significant downward trends also show declining concentrations for total VOCs. The declining concentrations are approaching asymptotic trends (Figure 12).
4. Time-series graphs of the two recovery wells show decreasing groundwater concentrations (Figures 13 and 14).
5. The groundwater treatment systems are operating at 100 percent efficiency for the contaminants of concern.

Since 2001, semiannual groundwater monitoring has been conducted and the groundwater remedial system evaluated. The results of the semiannual groundwater monitoring are reported to EPA in the Quarterly Update Reports of RD/RA Activities. The groundwater monitoring used for the first five-year review was conducted in November 2004. The results of that groundwater monitoring event reported that the groundwater treatment system continues to maintain hydraulic control at the Coleman OU (Figure 9).

The point of compliance monitoring wells are sampled to confirm the effectiveness of the groundwater remedial system. These wells are as follows:

- MW-71D/MW-71S, formerly MW-1/MW-4
- MW-3/MW-47
- MW-67/MW-68
- MW-51/MW-52
- MW-59/MW-60
- MW-15/MW-45
- MW-61 /MW-62

The groundwater TCE data from these wells are presented in Table 3 which generally demonstrates a decreasing trend in TCE concentrations since May 1990.

A review of available data during the first five-year review was completed by the EPA Ground Water Technical Support Center in Ada, Oklahoma (Attachment 2). The review agrees that the contaminant plume has been contained across the majority of the site area, but it appears that the current system is not containing the plume along part of the western boundary. Details of those areas are discussed in the report in Attachment 2.

As a result of the recommendations and concerns posed during the first five-year review, a study was initiated by Shaw Environmental to address those concerns posed by the EPA Ground Water Technical Support Center. It was determined that an area of stagnation had developed downgradient of RW-1. The recommendations to alleviate those conditions were to shut down RW-1 and the north air stripper and adjust the pumping rates of the south industrial well and RW-2. The study was completed in 2006; the implementation of the recommendations were put into place and monitored. In 2007, EPA approved a request to plug and abandon RW-1, which was implemented in 2008. The south air stripper (AS-2) is currently operating and remediating water from the south industrial well and the south recovery well (RW-2).

Figures 16 and 17 provide the current Locations of Monitoring Wells for Groundwater Monitoring & Point of Compliance Programs and Groundwater Flow Direction Map, April 2010, respectively. Figures 18 and 19 provide the isoconcentration map of the shallow TCE and deep TCE, respectively, from data collected in April 2010.

## **5.0 PROGRESS SINCE THE LAST REVIEW**

This is the second five-year review for the Coleman OU of the 29<sup>th</sup> and Mead site.

## **6.0 FIVE-YEAR REVIEW PROCESS**

### **6.1 Administrative Components**

The five-year review for the Coleman OU of the 29<sup>th</sup> and Mead site was conducted by Ken Rapplean, EPA Remedial Project Manager for the site.

EPA completed the following tasks during the five-year review for the Coleman OU of the 29<sup>th</sup> and Mead site:

- Reviewed site documents such as the ROD, the Consent Agreement, the Baseline Risk Assessment Report, annual groundwater monitoring reports, and quarterly monitoring reports (Attachment 1)
- Reviewed applicable or relevant and appropriate requirements (ARARs)
- Conducted a site inspection and interview of appropriate persons
- Developed recommendations for the site
- Prepared a report

## **6.2 Community Involvement**

When the five-year review report is finalized, a copy of the document will be made available at the KDHE District Office in Wichita, Kansas. EPA will place a notice of the availability of the document in the *Wichita Eagle Newspaper*.

## **6.3 Document Review**

The following standards were identified as ARARs in the ROD:

- Safe Drinking Water Act
- Clean Water Act

The Safe Drinking Water Act was reviewed for changes that could affect the protectiveness of the remedy. Newly promulgated Safe Drinking Water Act standards were not discovered during the second five-year review. The MCLs for the contaminants of concern have not become more stringent since the signing of the ROD in 1994.

Compliance with the Clean Water Act requirements under 40 C.F.R. §§ 122-125 for point source direct discharge has been obtained under the NPDES by which effluent standards, monitoring requirements, and standard conditions for discharge are set. An NPDES permit has been granted to both operating air stripper units on the Coleman OU site for the discharge of treated water. This discharge is in compliance with the terms of the permit. Newly promulgated Clean Water Act standards were not discovered during the second five-year review which would affect the permit or the discharge requirements.

One new ARAR was identified during the first five-year review. In 1999, KDHE developed risk-based standards for soil and groundwater for sites being addressed by KDHE programs. The 1999 standards were revised and are presented in a document titled Risk-Based Standards for Kansas (RSK Manual-3<sup>rd</sup> Version) dated March 1, 2003. The risk-based standards have not been promulgated by the state of Kansas and therefore fall in the category of To Be Considered. KDHE developed risk-based standards for exposure to soil and groundwater media under residential and nonresidential scenarios. Standards include pathways for exposure to soil, exposure to groundwater, and migration of contaminants from soil to groundwater. The risk-based standards for the contaminants detected in groundwater at the site are not more stringent than the MCLs.

## **6.4 Data Review**

### **6.4.1 Soil Vapor Extraction System**

The PRP had submitted a Quarterly Update Report of RD/RA Activities to EPA to report activities related to O&M of the groundwater remedial system and the SVE system. The reports have now been changed to a semiannual period. These reports include performance data of the SVE system summarizing sampling activities and VOCs removed by the system.

Performance monitoring activities involve data collection to evaluate VOC effluent concentrations and removal of VOCs from the soil by collecting air samples from the SVE exhaust. The most recent air emissions and air flow data were collected in April 2010. The SVE system does not have vapor recovery equipment. The SVE system is required to release less than 40 tons of VOCs per year, and the release was below this limit.

The performance data will continue to be reviewed and evaluated from the Southfield to determine when it is feasible to consider any adjustments or shut down of the system.

#### **6.4.2 Groundwater Remedial System**

The results of the semiannual groundwater monitoring are now reported to EPA in the Semi Annual Update Summary Reports of RD/RA Activities. The groundwater monitoring included in the second five-year review was conducted in April 2010.

The review of that data and previous summary reports indicate that the groundwater treatment system continues to maintain hydraulic control at the Coleman OU.

A review of Figures 17, 18, and 19 indicates that the current system of two pumping wells provides containment of the plume and a general decrease of levels of TCE, particularly in the deep part of the plume. The system will need to be evaluated once a remedial action is decided upon for the NIC site.

#### **6.5 Site Inspection**

EPA conducted a site inspection at the Coleman OU of the 29<sup>th</sup> and Mead site on September 2, 2010. The results of the site inspection are discussed below.

The site inspection was conducted by Kenneth Rapplean of EPA. The purpose of the site inspection was to assess the operation of the SVE system and the groundwater extraction system. Mr. Kevin Hopkins of Shaw Environmental conducted the site tour. A meeting prior to the site tour was conducted to discuss the location of site-related documents which continue to be housed at the Wichita Office of Shaw Environmental.

#### **6.6 Interviews**

Interviews were not conducted with the general public during the second five-year review. EPA has not received any complaints or concerns from the public or businesses adjacent to the 29<sup>th</sup> and Mead site.

Discussion with the Shaw representative was conducted during the site inspection regarding the O&M of the systems.

## **7.0 ASSESSMENT**

The following conclusions support the finding that the remedy at the Coleman OU of the 29<sup>th</sup> and Mead site is protective of human health and the environment.

### **Question A: Is the remedy functioning as intended by the decision document?**

**Remedial Action Performance:** Yes, the remedial action continues to operate and function as designed and intended by the ROD. This includes both the remaining SVE system for remediation of contaminated soil and the groundwater remedial system for containment and treatment of contaminated groundwater. The SVE system has removed approximately 4,395 pounds of VOC contaminants from the soil since May 2000.

The groundwater remedial system continues to maintain hydraulic control of the groundwater at the site.

**System Operations/Operations & Maintenance:** Monitoring and site maintenance have been performed in accordance with the O&M work plan. The groundwater remedial wells and the air stripper are operational. The hardware for the SVE system is in operational condition.

**Opportunities for Optimization:** The PRPs will evaluate any changes that may be necessary to the system when the remedial action is implemented at the NIC site.

**Early Indicators of Potential Issues:** No issues or problems have been identified which could place protectiveness at risk. EPA is not aware of any use of the groundwater at the site for potable purposes. Equipment or changes have not been an issue during implementation and operation of the remedial action.

**Implementation of Institutional Controls:** Institutional controls were not part of the remedial action. Institutional controls at the Coleman OU site area can be considered to be in place because there is no use of the groundwater for potable purposes, only industrial. All drinking water is supplied by the city of Wichita. All owners and operators at the site are respondents to the Consent Decree or successor owners/operators and are aware of the contaminants at the site.

### **Question B: Are the assumptions used at the time of the remedy selection still valid?**

**Changes in Standards and To Be Considereds:** Yes, the MCLs for the contaminants of concern have not changed during the last five years. The standards developed by Kansas for site contaminants in groundwater are not more stringent than existing federal standards.

**Changes in Exposure Pathways:** Land use in the area of the site has not changed during the last five years, and no future plans to change the land use have been identified. No new/different contaminants or sources have been identified at the site during the second five-year review. Baseline Risk Assessment focused on potential or actual risks to human health posed by contaminants at or released from the Coleman OU property. The human population most likely

to be exposed to contaminated groundwater and air are those individuals living and working in the vicinity. The exposure assumptions and pathways used to develop the Human Health Risk Assessment are still valid.

**Changes in Toxicity and Other Contaminant Characteristics:** The review indicated no significant impacts.

**Changes in Risk Assessment Methodologies:** Changes in risk assessment methodologies since the time of the ROD do not call into question the protectiveness of the remedy.

**Expected Progress Toward Meeting Remedial Action Objectives:** The remedy is progressing as expected. The SVE system may have removed the majority of the VOCs which can be addressed by the system. The groundwater remedial system continues to remove contaminants from the groundwater but may need to be adjusted when the remedial action is implemented at the NIC site.

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

No ecological targets were identified during the Baseline Risk Assessment, and none were identified during the second five-year review; therefore, monitoring of ecological targets is not necessary. No weather-related events have affected the protectiveness of the remedy. There is no other information that calls into question the protectiveness of the remedy.

### **Technical Assessment Summary**

According to the data reviewed, the site inspection, and the interview, the remedy is functioning as intended by the ROD. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. The decommissioning of eight SVE areas is an indicator that the SVE system may have removed the majority of the VOCs which can be addressed by the system. The groundwater remedial system continues to maintain hydraulic control of groundwater across the site. There have been no changes of significance in the toxicity factors for the contaminants of concern that were used in the Baseline Risk Assessment, and there has been no change to the standardized risk assessment methodology that could affect the protectiveness of the remedy. There is no other information that calls into question the protectiveness of the remedy.

### **8.0 ISSUES**

There are no issues other than the need to review the groundwater extraction system to determine if changes need to be made on the on-site system and determine the impact on the immediate area surrounding the site when the remedial action is implemented at the NIC site.

## **9.0 RECOMMENDATIONS AND FOLLOW-UP ACTIONS**

Continue to collect semiannual SVE systems performance data to evaluate system operation.

Continue the groundwater monitoring compliance program to confirm hydraulic control of the groundwater contaminant plume at the Coleman OU. The compliance monitoring program should continue to consist of the two procedures in place for confirming hydraulic control of the groundwater contaminant plume currently utilized. The first procedure is an evaluation of water elevation data on and near the Coleman OU to verify the direction of groundwater flow and the extent of hydraulic control exerted by the operating recovery wells. The second procedure consists of the collection of groundwater quality data from a specified point of compliance wells to evaluate the effectiveness of the contamination removal. Air stripper performance data should continue to be collected to evaluate percent removal for each treatment system and the air emission rates of each treatment system.

## **10.0 PROTECTIVENESS STATEMENT**

The remedy at the Coleman OU of the 29<sup>th</sup> and Mead Superfund site is protective of human health and the environment through removal of soil VOC contamination by the SVE system and hydraulic containment of groundwater contamination by the groundwater remedial system.

Long-term protectiveness of the remedial action will continue to be verified by obtaining additional groundwater sampling to verify hydraulic containment by the groundwater remediation system in addition to the removal of contamination of the soil.

## **11.0 NEXT REVIEW**

This is a statutory site that requires ongoing five-year reviews. The next review will be conducted five years from the date of signature of this five-year review (September 2015).

## **12.0 OTHER COMMENTS**

No other comments are necessary.

**Table 3**

**Comparison of Detections of Trichloroethylene in Groundwater Samples  
Point of Compliance Wells**

<b>Point of Compliance Well Number</b>	<b>May 1990 TCE (ug/L)</b>	<b>May 1996 TCE (ug/L)</b>	<b>November 2000 TCE (ug/L)</b>	<b>May 2002 TCE (ug/L)</b>	<b>November 2004 TCE (ug/L)</b>
MW-71D (MW-1)*	630	130	2.6	3.9	46
MW-71S (MW-48)**	1800	300	15	34	8.9
MW-3	9.2	0.6	0.5U	0.5U	1.0U
MW-47	7.0	0.4	0.5U	0.5U	1.0U
MW-67	960	120	86	62	1.8
MW-68	850	150	29	46	14
MW-51	17	12	14	NA	3.4
MW-52	20	62	10	10	2.4
MW-59	0.3	NA	0.5U	0.5U	1.0U
MW-60	0.3	NA	0.5U	0.5U	1.0U
MW-15	3500	120	34	15	3.3
MW-45	2200	380	44	91	46
MW-61	310	NA	1.7	10	2.1
MW-62	2300	350	31	150	54

TCE - Trichloroethylene

NA- Not Analyzed

U - Compound not detected

\* - MW-71D formerly MW-1

\*\* - MW-71S formerly MW-48

**Table 4  
Recommendations and Follow-up Actions**

<b>Item</b>	<b>Recommendations/ Follow-up Action</b>	<b>Responsible Party</b>	<b>Oversight Agency</b>	<b>Milestone Date</b>	<b>Follow-up Actions: Affects Protectiveness (Yes/No)</b>
Monitoring Program	Continue semiannual monitoring program to verify hydraulic containment and VOC removal. This will continue after the determination of any changes to the existing groundwater pump and treat system	New Coleman Holdings, Evcon, Recreational Vehicles Products, Inc.	EPA	May and November of each year	Yes
Monitoring Program	Continue semiannual air stripper monitoring program to verify treatment efficiency	New Coleman Holdings, Evcon, Recreational Vehicles Products, Inc.	EPA	May and November of each year	Yes
Monitoring Program	Monitor SVE system performance to evaluate system operation	New Coleman Holdings, Evcon, Recreational Vehicles Products, Inc.	EPA	Quarterly	Yes
SVE Operation	Evaluate continued operation of SVE system	New Coleman Holdings, Evcon, Recreational Vehicles Products, Inc.	EPA	As appropriate	Yes

**Attachment 1**  
**Documents Reviewed**

Ground Water Technology, Report of Remedial Investigation Activities, Coleman Operable Unit, Wichita, Kansas, September 3, 1991, Revision IV August 27, 1992.

Ground Water Technology, Feasibility Study Report, Coleman Operable Unit, Wichita, Kansas, September 25, 1991, Final July 2, 1992.

PRC Environmental, Risk Assessment for Coleman Operable Unit, Final Report, November 27, 1991

Fluor Daniel GTI, Final Remedial Design and Remedial Action Work Plan, Interim Ground Water Remedy, Coleman Operable Unit, Wichita, Kansas, May 3, 1996, Revised August 20, 1996

Fluor Daniel GTI, Remedial Design and Remedial Action Ground Compliance Monitoring Plan, Coleman Operable Unit, Wichita, Kansas, May 3, 1996

IT Group, Pre-Final Remedial Design and Remedial Action Work Plan, Final Soil Remedy, Coleman Operable Unit, Wichita, Kansas, August 5, 1999

Fluor Daniel GTI, Monthly Data Summary Report of RD/RA Activities, July 2, 1996

IT Group, Coleman Operable Unit, Quarterly Update of RD/RA Activities, January 10, 2001

Shaw Group, Coleman Operable Unit, Quarterly Update of RD/RA Activities, January 10, 2002

Shaw Group, Coleman Operable Unit, Quarterly Update of RD/RA Activities, January 17, 2005

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 as amended by the Superfund Amendments and Reauthorization Act of 1986, 42 U. S. C. § 9601 et seq.

Kansas Department of Health and Environment, 1990, Consent Agreement between the Kansas Department of Health and Environment and the Obee Road PRP Group, March 27, 1990

United States of America, Plaintiffs v. Evcon Industries, Inc, New Coleman Holdings, Inc., and Recreational Vehicle Products, Inc., Consent Decree, Filed February 18, 1994

National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300

United States Environmental Protection Agency Region VII, Record of Decision, Coleman Operable Unit, 29<sup>th</sup> and Mead Superfund Site, Wichita, Kansas, September 1992

United States Environmental Protection Agency Region VII, 1994, Interim Remedial Action Report, 29<sup>th</sup> and Mead Ground Water Contamination Site, Coleman Operable Unit, Wichita, Kansas, September 2000

**United States Environmental Protection Agency Region VII; First Five Year Review Report for the Coleman Operable Unit of the 29<sup>th</sup> and Mead Site, Wichita, Kansas; September 2005**

**All Quarterly and Semi Annual Reports of RD/RA Activities, Coleman Operable Unit (COU) dated after the first Five Year Review including July 13, 2010**

**Attachment 2**

**Site Inspection Checklist**

## Site Inspection Checklist

I. SITE INFORMATION	
<b>Site name:</b> 29 <sup>th</sup> & Mead, Coleman Operable Unit	<b>Date of inspection:</b> 9-1-10
<b>Location and Region:</b> Wichita, Kansas, Region 7	<b>EPA ID:</b> KSD007241656
<b>Agency, office, or company leading the five-year review:</b> EPA	<b>Weather/temperature:</b> Fair, 90 F, light winds
<b>Remedy Includes: (Check all that apply)</b> <input type="checkbox"/> Landfill cover/containment <input type="checkbox"/> Monitored natural attenuation <input type="checkbox"/> Access controls <input type="checkbox"/> Groundwater containment <input type="checkbox"/> Institutional controls <input type="checkbox"/> Vertical barrier walls <input checked="" type="checkbox"/> Groundwater pump and treatment <input type="checkbox"/> Surface water collection and treatment <input checked="" type="checkbox"/> Other_Soil Vapor Extraction _____	
<b>Attachments:</b> <input type="checkbox"/> Inspection team roster attached <input type="checkbox"/> Site map attached	
II. INTERVIEWS (Check all that apply)	
<b>1. O&amp;M site manager</b> <u>Kevin Hopkins</u> Remediation Project Manager, Shaw Environmental _____ <div style="display: flex; justify-content: space-between;"> <span>Name</span> <span>Title</span> <span>Date 9-1-2010</span> </div> Interviewed <input checked="" type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone    Phone no. <u>316-943-1321</u> Problems, suggestions; <input type="checkbox"/> Report attached _____ _____	
<b>2. O&amp;M staff</b> _____ <div style="display: flex; justify-content: space-between;"> <span>Name</span> <span>Title</span> <span>Date</span> </div> Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone    Phone no. _____ Problems, suggestions; <input type="checkbox"/> Report attached _____ _____	



**III. ON-SITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)**

1.	<b>O&amp;M Documents</b>	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	<input checked="" type="checkbox"/> O&M manual	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	<input checked="" type="checkbox"/> As-built drawings	<input checked="" type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	<input type="checkbox"/> Maintenance logs	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks _____ Documents are located at the Shaw Office _____			
2.	<b>Site-Specific Health and Safety Plan</b>	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	<input type="checkbox"/> Contingency plan/emergency response plan	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks _____			
3.	<b>O&amp;M and OSHA Training Records</b>	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks _____			
4.	<b>Permits and Service Agreements</b>			
	<input type="checkbox"/> Air discharge permit	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	<input checked="" type="checkbox"/> Effluent discharge	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	<input type="checkbox"/> Waste disposal, POTW	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	<input type="checkbox"/> Other permits _____	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks _____			
5.	<b>Gas Generation Records</b>	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks _____			
6.	<b>Settlement Monument Records</b>	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks _____			
7.	<b>Groundwater Monitoring Records</b>	<input checked="" type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks _____			
8.	<b>Leachate Extraction Records</b>	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks _____			
9.	<b>Discharge Compliance Records</b>			
	<input type="checkbox"/> Air	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	<input checked="" type="checkbox"/> Water (effluent)	<input checked="" type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks _____			
10.	<b>Daily Access/Security Logs</b>	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks _____			

**IV. O&M COSTS**

1. **O&M Organization**  
 State in-house                       Contractor for State  
 PRP in-house                          Contractor for PRP  
 Federal Facility in-house          Contractor for Federal Facility  
 Other \_\_\_\_\_

2. **O&M Cost Records**  
 Readily available(at Shaw Office)          Up to date  
 Funding mechanism/agreement in place  
 Original O&M cost estimate \_\_\_\_\_  Breakdown attached

Total annual cost by year for review period if available

From _____	To _____	_____	<input type="checkbox"/> Breakdown attached
Date	Date	Total cost	
From _____	To _____	_____	<input type="checkbox"/> Breakdown attached
Date	Date	Total cost	
From _____	To _____	_____	<input type="checkbox"/> Breakdown attached
Date	Date	Total cost	
From _____	To _____	_____	<input type="checkbox"/> Breakdown attached
Date	Date	Total cost	
From _____	To _____	_____	<input type="checkbox"/> Breakdown attached
Date	Date	Total cost	

3. **Unanticipated or Unusually High O&M Costs During Review Period**  
 Describe costs and reasons: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**V. ACCESS AND INSTITUTIONAL CONTROLS**     Applicable     N/A

**A. Fencing**

1. **Fencing damaged**                       Location shown on site map          Gates secured          N/A  
 Remarks \_\_\_\_\_  
 \_\_\_\_\_

**B. Other Access Restrictions**

1. **Signs and other security measures**          Location shown on site map          N/A  
 Remarks \_\_\_\_\_ Guards on  
 duty \_\_\_\_\_  
 \_\_\_\_\_

<b>C. Institutional Controls (ICs)</b>			
<b>1.</b>	<b>Implementation and enforcement</b>		
	Site conditions imply ICs not properly implemented	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
	Site conditions imply ICs not being fully enforced	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
	Type of monitoring (e.g., self-reporting, drive by) _____		
	Frequency _____		
	Responsible party/agency TOTAL, Pester, KDHE		
	Contact <u>Samuel Chris Itin</u>	<u>Remediation Project Manager, TOTAL</u>	
	Name	Title	
	Reporting is up-to-date	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
	Reports are verified by the lead agency	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
	Specific requirements in deed or decision documents have been met	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
	Violations have been reported	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
	Other problems or suggestions: <input type="checkbox"/> Report attached		
	_____		
	_____		
	_____		
<b>2.</b>	<b>Adequacy</b>	<input type="checkbox"/> ICs are adequate	<input type="checkbox"/> ICs are inadequate <input checked="" type="checkbox"/> N/A
	Remarks _____		
	_____		
	_____		
<b>D. General</b>			
<b>1.</b>	<b>Vandalism/trespassing</b>	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> No vandalism evident
	Remarks _____		
	_____		
<b>2.</b>	<b>Land use changes on site</b>	<input checked="" type="checkbox"/> N/A	
	Remarks _____		
	_____		
<b>3.</b>	<b>Land use changes off site</b>	<input checked="" type="checkbox"/> N/A	
	Remarks _____		
	_____		
<b>VI. GENERAL SITE CONDITIONS</b>			
<b>A. Roads</b>	<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A	
<b>1.</b>	<b>Roads damaged</b>	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Roads adequate <input type="checkbox"/> N/A
	Remarks <u>Oil seepage on the access road has been addressed by the PRP with removal of soil and addition of quickrete and gravel.</u>		
	_____		

**B. Other Site Conditions**

Remarks \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**VII. LANDFILL COVERS**     Applicable     N/A

**A. Landfill Surface**

1.    **Settlement (Low spots)**                       Location shown on site map                       Settlement not evident  
 Areal extent \_\_\_\_\_                      Depth \_\_\_\_\_  
 Remarks \_\_\_\_\_

2.    **Cracks**     Location shown on site map                       Cracking not evident  
 Lengths \_\_\_\_\_                      Widths \_\_\_\_\_                      Depths \_\_\_\_\_  
 Remarks \_\_\_\_\_

3.    **Erosion**     Location shown on site map                       Erosion not evident  
 Areal extent \_\_\_\_\_                      Depth \_\_\_\_\_  
 Remarks \_\_\_\_\_

4.    **Holes**     Location shown on site map                       Holes not evident  
 Areal extent \_\_\_\_\_                      Depth \_\_\_\_\_  
 Remarks \_\_\_\_\_

5.    **Vegetative Cover**                       Grass                       Cover properly established                       No signs of stress  
 Trees/Shrubs (indicate size and locations on a diagram)  
 Remarks \_\_\_\_\_

6.    **Alternative Cover (armored rock, concrete, etc.)**                       N/A  
 Remarks \_\_\_\_\_

7.    **Bulges**     Location shown on site map                       Bulges not evident  
 Areal extent \_\_\_\_\_                      Height \_\_\_\_\_  
 Remarks \_\_\_\_\_

8.    **Wet Areas/Water Damage**                       Wet areas/water damage not evident  
 Wet areas     Location shown on site map                      Areal extent \_\_\_\_\_  
 Ponding     Location shown on site map                      Areal extent \_\_\_\_\_  
 Seeps     Location shown on site map                      Areal extent \_\_\_\_\_  
 Soft subgrade     Location shown on site map                      Areal extent \_\_\_\_\_  
 Remarks \_\_\_\_\_

9.	<b>Slope Instability</b>	<input type="checkbox"/> Slides	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> No evidence of slope instability
	Areal extent _____			
	Remarks _____			
<b>B. Benches</b> <input type="checkbox"/> Applicable <b>N/A</b>				
(Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)				
1.	<b>Flows Bypass Bench</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> N/A or okay	
	Remarks _____			
2.	<b>Bench Breached</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> N/A or okay	
	Remarks _____			
3.	<b>Bench Overtopped</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> N/A or okay	
	Remarks _____			
<b>C. Letdown Channels</b> <input type="checkbox"/> Applicable <b>N/A</b>				
(Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)				
1.	<b>Settlement</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> No evidence of settlement	
	Areal extent _____	Depth _____		
	Remarks _____			
2.	<b>Material Degradation</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> No evidence of degradation	
	Material type _____	Areal extent _____		
	Remarks _____			
3.	<b>Erosion</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> No evidence of erosion	
	Areal extent _____	Depth _____		
	Remarks _____			

4.	<b>Undercutting</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> No evidence of undercutting
	Areal extent _____	Depth _____	
	Remarks _____		
5.	<b>Obstructions</b> Type _____	<input type="checkbox"/> No obstructions	
	<input type="checkbox"/> Location shown on site map	Areal extent _____	
	Size _____		
	Remarks _____		
6.	<b>Excessive Vegetative Growth</b> Type _____		
	<input type="checkbox"/> No evidence of excessive growth		
	<input type="checkbox"/> Vegetation in channels does not obstruct flow		
	<input type="checkbox"/> Location shown on site map	Areal extent _____	
	Remarks _____		
<b>D. Cover Penetrations</b> <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A			
1.	<b>Gas Vents</b>	<input type="checkbox"/> Active	<input type="checkbox"/> Passive
	<input type="checkbox"/> Properly secured/locked	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled
	<input type="checkbox"/> Evidence of leakage at penetration	<input type="checkbox"/> Good condition	
	<input type="checkbox"/> N/A	<input type="checkbox"/> Needs Maintenance	
	Remarks _____		
2.	<b>Gas Monitoring Probes</b>	<input type="checkbox"/> Routinely sampled	<input type="checkbox"/> Good condition
	<input type="checkbox"/> Properly secured/locked	<input type="checkbox"/> Functioning	<input type="checkbox"/> Needs Maintenance
	<input type="checkbox"/> Evidence of leakage at penetration	<input type="checkbox"/> N/A	
	Remarks _____		
3.	<b>Monitoring Wells (within surface area of landfill)</b>	<input type="checkbox"/> Routinely sampled	<input type="checkbox"/> Good condition
	<input type="checkbox"/> Properly secured/locked	<input type="checkbox"/> Functioning	<input type="checkbox"/> Needs Maintenance
	<input type="checkbox"/> Evidence of leakage at penetration	<input type="checkbox"/> N/A	
	Remarks _____		
4.	<b>Leachate Extraction Wells</b>	<input type="checkbox"/> Routinely sampled	<input type="checkbox"/> Good condition
	<input type="checkbox"/> Properly secured/locked	<input type="checkbox"/> Functioning	<input type="checkbox"/> Needs Maintenance
	<input type="checkbox"/> Evidence of leakage at penetration	<input type="checkbox"/> N/A	
	Remarks _____		
5.	<b>Settlement Monuments</b>	<input type="checkbox"/> Located	<input type="checkbox"/> Routinely surveyed
	<input type="checkbox"/> N/A		
	Remarks _____		

<b>E. Gas Collection and Treatment</b>			<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	<b>Gas Treatment Facilities</b>	<input type="checkbox"/> Flaring	<input type="checkbox"/> Thermal destruction	<input type="checkbox"/> Collection for reuse
		<input type="checkbox"/> Good condition	<input type="checkbox"/> Needs Maintenance	
	Remarks _____			
2.	<b>Gas Collection Wells, Manifolds and Piping</b>	<input type="checkbox"/> Good condition	<input type="checkbox"/> Needs Maintenance	
	Remarks _____			
3.	<b>Gas Monitoring Facilities (e.g., gas monitoring of adjacent homes or buildings)</b>	<input type="checkbox"/> Good condition	<input type="checkbox"/> Needs Maintenance	<input type="checkbox"/> N/A
	Remarks _____			
<b>F. Cover Drainage Layer</b>			<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	<b>Outlet Pipes Inspected</b>	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A	
	Remarks _____			
2.	<b>Outlet Rock Inspected</b>	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A	
	Remarks _____			
<b>G. Detention/Sedimentation Ponds</b>			<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	<b>Siltation</b>	Areal extent _____	Depth _____	<input type="checkbox"/> N/A
	<input type="checkbox"/> Siltation not evident			
	Remarks _____			
2.	<b>Erosion</b>	Areal extent _____	Depth _____	
	<input type="checkbox"/> Erosion not evident			
	Remarks _____			
3.	<b>Outlet Works</b>	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A	
	Remarks _____			
4.	<b>Dam</b>	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A	
	Remarks _____			

<b>H. Retaining Walls</b>		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	<b>Deformations</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Deformation not evident
	Horizontal displacement _____	Vertical displacement _____	
	Rotational displacement _____		
	Remarks _____		
<hr/>			
2.	<b>Degradation</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Degradation not evident
	Remarks _____		
<hr/>			
<b>I. Perimeter Ditches/Off-Site Discharge</b>		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	<b>Siltation</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Siltation not evident
	Areal extent _____	Depth _____	
	Remarks _____		
<hr/>			
2.	<b>Vegetative Growth</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> N/A
	<input type="checkbox"/> Vegetation does not impede flow		
	Areal extent _____	Type _____	
	Remarks _____		
<hr/>			
3.	<b>Erosion</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Erosion not evident
	Areal extent _____	Depth _____	
	Remarks _____		
<hr/>			
4.	<b>Discharge Structure</b>	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A
	Remarks _____		
<hr/>			
<b>VIII. VERTICAL BARRIER WALLS</b>		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	<b>Settlement</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Settlement not evident
	Areal extent _____	Depth _____	
	Remarks _____		
<hr/>			
2.	<b>Performance Monitoring</b>	Type of monitoring _____	
	<input type="checkbox"/> Performance not monitored		
	Frequency _____	<input type="checkbox"/> Evidence of breaching	
	Head differential _____		
	Remarks _____		

<b>C. Treatment System</b>		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
1.	<b>Treatment Train (Check components that apply)</b> <input type="checkbox"/> Metals removal <input type="checkbox"/> Oil/water separation <input type="checkbox"/> Bioremediation <input checked="" type="checkbox"/> Air stripping <input type="checkbox"/> Carbon adsorbers <input type="checkbox"/> Filters _____ <input type="checkbox"/> Additive (e.g., chelation agent, flocculent) _____ <input checked="" type="checkbox"/> Others ___ Soil Vapor Extraction _____ <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance <input checked="" type="checkbox"/> Sampling ports properly marked and functional <input type="checkbox"/> Sampling/maintenance log displayed and up to date <input checked="" type="checkbox"/> Equipment properly identified <input type="checkbox"/> Quantity of groundwater treated annually _____ <input type="checkbox"/> Quantity of surface water treated annually _____ Remarks _____ _____		
2.	<b>Electrical Enclosures and Panels (properly rated and functional)</b> <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks _____ _____		
3.	<b>Tanks, Vaults, Storage Vessels</b> <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Good condition <input type="checkbox"/> Proper secondary containment <input type="checkbox"/> Needs Maintenance Remarks _____ _____		
4.	<b>Discharge Structure and Appurtenances</b> <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks _____ _____		
5.	<b>Treatment Building(s)</b> <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Good condition (esp. roof and doorways) <input type="checkbox"/> Needs repair <input type="checkbox"/> Chemicals and equipment properly stored Remarks _____ _____		
6.	<b>Monitoring Wells (pump and treatment remedy)</b> <input checked="" type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> All required wells located <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks _____ _____		
<b>D. Monitoring Data</b>			
1.	<b>Monitoring Data</b> <input checked="" type="checkbox"/> Is routinely submitted on time <input checked="" type="checkbox"/> Is of acceptable quality		
2.	<b>Monitoring data suggests:</b> <input checked="" type="checkbox"/> Groundwater plume is effectively contained <input type="checkbox"/> Contaminant concentrations are declining		

**D. Monitored Natural Attenuation**

1. **Monitoring Wells (natural attenuation remedy)**  
 Properly secured/locked       Functioning     Routinely sampled       Good condition  
 All required wells located       Needs Maintenance       N/A  
Remarks \_\_\_\_\_

**X. OTHER REMEDIES**

If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.

Soil Vapor Extraction: Southfield area: All equipment, sampling ports etc. appeared to be in good conditions and monitoring data is acceptable.

**XI. OVERALL OBSERVATIONS**

**A. Implementation of the Remedy**

Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).

\_\_\_\_\_ The remedy is containment and treatment of contaminated groundwater and soil vapor extraction of the Southfield. All equipment is acceptable, the data in the RD/RA semi annual reports are acceptable and demonstrate that the remedy as designed is functioning and is protective of human health and the environment. \_\_\_\_\_

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**B. Adequacy of O&M**

Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.

\_\_\_\_\_ All operation and maintenance is being performed according to the semi-annual RD/RA Reports

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**C. Early Indicators of Potential Remedy Problems**

Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future.

None

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**D. Opportunities for Optimization**

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.

   An opportunity for optimization of the groundwater remedy may occur when the remedial action for the NIC Site is determined.

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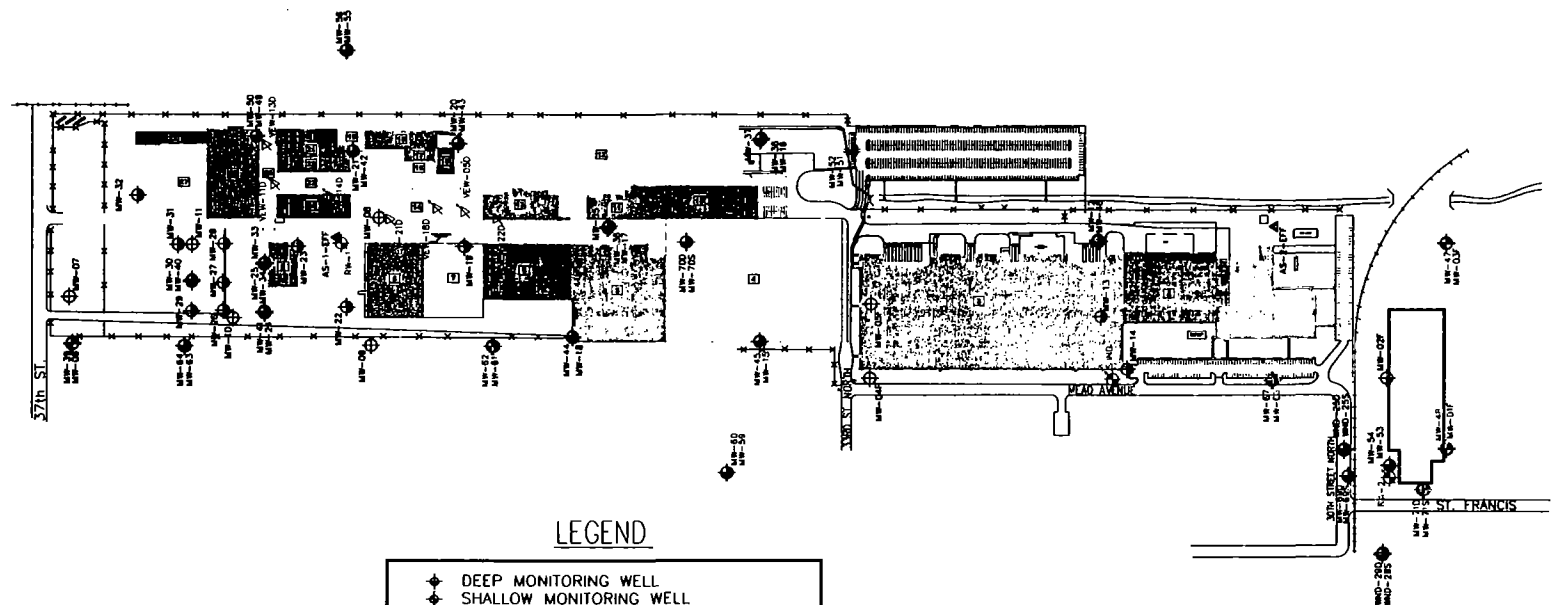
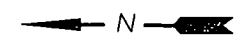
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Table 2  
Sump Area Flow & VOC Data  
Coleman Operable Unit  
Wichita, Kansas

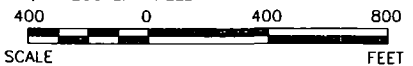
SITE	DATE	FLOW gpd	Blower Vacuum inHg	Differential Pressure inHg	FLOW acfm	PID ppmv	CONCENTRATIONS										REMOVAL RATE lb/day	NUMBER OF DAYS	TOTAL LBS REMOVED PER PERIOD
							1,1,1-TCA ug/l	PCE ug/l	Toluene ug/l	o-x-1,2-DCE ug/l	1,1-DCE ug/l	Vinyl Chloride ug/l	TCE ug/l	TOTAL VOCs ug/l					
SOUTHFIELD	05/17/2000	0.36	76	0.05	22.8	1738	7.1	<2.8	<1.8	490	<1.8	<1	480.0	907.10	2.044	0.83	1.70		
SOUTHFIELD	05/18/2000	0.23	75	0.04	13.8	2000+	23	<28	2300	3000	140	910	3100	12073	14.980	1	14.98		
SOUTHFIELD	05/23/2000	0.41	76	0.05	24.8	2000+	82	<89	1900	3700	150	730	14000	20562	48.480	5	227.40		
SOUTHFIELD	05/30/2000	0.43	76	0.06	25.8	2000+	87	<78	1900	3000	94	520	16000	21501	49.877	7	349.14		
SOUTHFIELD	06/05/2000	0.36	76	0.04	21.8	2000+	<78	<83	2300	3000	72	620	13000	16982	38.884	8	221.31		
SOUTHFIELD	06/28/2000	0.25	77	0.01	15.0	2000+	52.00	<34	3400	2500	59	430	8500	11490	20.149	23	463.43		
SOUTHFIELD	07/19/2000	0.24	86	0.19	14.4	2000+	87.00	<28	1500	1900	72	170	3600	5829	7.268	21	153.05		
SOUTHFIELD	09/25/2000	1.99	81	0.80	119.4	191	4.20	<0.60	81	33	1	4	130	253	2.717	68	184.77		
SOUTHFIELD	10/23/2000	1.91	83	0.71	114.6	103	5.10	<0.90	76	34	2	5	180	280	2.867	28	80.84		
SOUTHFIELD	11/30/2000	0.82	87	0.13	49.2	277	6.80	<1.4	80	41	2	5	360	684	2.142	38	81.41		
SOUTHFIELD	12/12/2000	0.80	70	0.10	34.8	45.0	1.20	<0.34	9	6	0	0	81	97	0.306	12	3.66		
SOUTHFIELD	01/25/2001	0.00	---	---	0.0	0.00	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	02/12/2001	0.00	---	---	0.0	0.00	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	03/20/2001	0.36	71	0.10	21.8	148	17.00	<1.4	150	98	8.20	25.00	310	808	1.177	38	42.38		
SOUTHFIELD	04/24/2001	0.41	84.3	0.05	24.8	209	23.00	<1.1	170	83	6.40	9.80	220	482	1.067	36	37.33		
SOUTHFIELD	05/17/2001	0.59	64.0	0.05	35.4	0.00	18.00	<1.4	130	38	4.00	4.60	180	375	1.193	23	27.44		
SOUTHFIELD	06/25/2001	0.56	---	---	34.8	98.8	6.30	0.40	86	22	1.80	2.30	91	190	0.504	39	23.17		
SOUTHFIELD	07/24/2001	0.83	---	---	37.8	17.8	0.74	<0.17	3.1	3.8	0.14	0.17	32	40	0.138	29	3.94		
SOUTHFIELD	08/27/2001	2.02	39	---	121.2	14.0	0.83	<0.14	2.2	8.2	0.17	0.23	25	33	0.364	34	12.89		
SOUTHFIELD	09/29/2001	1.85	37	0.46	111	13.2	1.10	0.34	4.1	6.5	0.34	0.37	30	43	0.427	39	12.80		
SOUTHFIELD	10/23/2001	2.18	---	---	129.8	18.1	0.44	0.27	1.4	1.9	0.11	0.13	13	17.25	0.201	27	6.43		
SOUTHFIELD	11/19/2001	2.06	40	0.81	123.6	6.3	0.38	<0.098	0.8	1.8	0.08	0.07	12	14.80	0.185	27	4.47		
SOUTHFIELD	12/28/2001	1.94	40	0.76	118.4	13.0	0.49	0.17	2.3	3.0	0.13	0.08	18	24.17	0.253	37	9.36		
SOUTHFIELD	01/25/2002	0.00	0	0.00	0.00	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	02/25/2002	0.00	0	0.00	0.00	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	03/19/2002	1.30	69	0.15	78.18	3.6	0.30	<0.086	0.4	3.0	0.23	0.40	19	23.48	0.185	22	3.83		
SOUTHFIELD	04/22/2002	0.73	40	0.26	43.8	0.00	1.00	<0.14	0.8	4.0	0.10	0.30	28	34.53	0.136	34	0.81		
SOUTHFIELD	05/13/2002	1.80	90	0.26	96.0	2.20	0.72	0.03	0.1	0.1	<0.0081	<0.0082	3	3.34	0.029	29	0.14		
SOUTHFIELD	06/12/2002	0.42	68	0.04	28.4	35.8	12.00	<1.4	19.0	32.0	3.00	1.50	380	427.50	0.959	38	34.87		
SOUTHFIELD	07/01/2002	0.84	78	0.06	50.4	19.4	1.80	<0.34	0.7	11.0	0.58	0.29	79	83.28	0.423	13	5.50		
SOUTHFIELD	08/05/2002	0.93	70	0.06	65.8	6.0	1.00	<0.14	1.7	5.7	0.29	0.33	33	42.02	0.211	36	7.38		
SOUTHFIELD	09/04/2002	1.01	70	0.07	80.8	23.0	1.70	<0.34	1.4	8.2	0.41	0.14	71	82.85	0.451	30	13.54		
SOUTHFIELD	10/01/2002	0.86	70	0.10	61.8	21.7	0.82	<0.34	1.5	5.8	0.28	<0.13	40	48.40	0.225	27	6.08		
SOUTHFIELD	11/09/2002	0.43	84	0.04	28.8	40.5	11.00	<1.4	14.0	11.0	1.00	<0.52	280	297.00	0.688	38	24.80		
SOUTHFIELD	12/03/2002	0.36	80	0.03	21.0	2.7	0.86	0.02	0.7	1.5	0.31	0.34	2	5.60	0.011	27	0.30		
SOUTHFIELD	01/01/2003	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	02/03/2003	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	03/03/2003	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	03/18/2003	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	04/08/2003	0.51	84	0.06	30.8	55.5	3.00	0.80	11.0	17.0	2.80	1.20	63	119.00	0.327	21	6.86		
SOUTHFIELD	05/14/2003	0.40	81	0.08	24.0	40.5	1.20	0.36	12.0	6.2	0.53	0.28	31	51.54	0.111	36	4.00		
SOUTHFIELD	06/09/2003	0.43	80	0.07	26.8	20.00	0.86	0.21	9.0	4.4	0.32	0.23	19	33.04	0.077	28	1.90		
SOUTHFIELD	07/09/2003	1.05	74	0.90	63.0	80.0	7.90	1.30	55.0	32.0	2.30	1.80	129	220.00	1.248	30	37.39		
SOUTHFIELD	08/12/2003	0.44	80	0.06	28.4	19.0	8.70	1.70	39.0	32.0	3.00	0.88	140	220.28	0.523	34	17.78		
SOUTHFIELD	09/05/2003	0.43	85	0.07	25.8	19.7	0.98	<0.23	<0.13	8.4	0.18	<0.087	63	58.54	0.138	27	3.73		
SOUTHFIELD	10/13/2003	0.28	82	0.04	15.0	58.2	4.00	1.40	28.0	24.0	1.50	2.70	140	202.60	0.273	36	9.56		
SOUTHFIELD	11/11/2003	0.19	83	0.08	11.4	22	1.80	0.34	9.1	12.0	0.74	1.30	38	63.28	0.085	29	1.88		
SOUTHFIELD	12/08/2003	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	01/12/2004	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	02/09/2004	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	03/09/2004	0.51	86	0.06	30.8	28.7	3.80	0.53	7.9	13.0	1.50	1.80	41	66.53	0.181	28	5.34		
SOUTHFIELD	04/12/2004	0.39	82	0.08	23.4	9.8	3.90	<0.23	3.8	11.0	1.80	0.82	37	65.32	0.123	28	4.29		
SOUTHFIELD	05/10/2004	0.39	---	---	23.4	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	07/01/2004	0.40	84	0.04	24.0	17.40	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	10/04/2004	1.01	76	0.21	80.8	23.20	0.21	0.03	0.33	0.89	0.06	0.04	3.80	5.38	0.029	95	2.77		
SOUTHFIELD	01/12/2005	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	04/11/2005	0.56	82	0.06	35.4	19.80	2.10	0.28	8.8	11.0	0.84	2.10	28.00	48.82	0.188	80	13.86		
SOUTHFIELD	07/05/2005	0.47	83	0.08	28.2	7.30	1.30	0.29	1.4	5.8	0.72	0.12	16.00	28.74	0.088	85	5.55		
SOUTHFIELD	09/01/2005	0.96	80	0.09	67.0	1.80	0.12	0.82	8.3	6.8	0.84	0.88	140	212	0.013	97	1.28		
SOUTHFIELD	04/04/2006	0.89	88	0.05	51.8	1.80	0.33	0.06	0.1	1.0	0.11	---	---	---	---	---	0.00		
SOUTHFIELD	07/08/2006	0.87	76	0.08	40.2	9.40	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	09/01/2006	0.19	72	0.01	11.4	6.10	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	09/06/2006	0.43	90	0.03	26.8	41.00	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	10/02/2006	1.44	49	0.28	88.4	2.20	<0.27	<0.34	2.7	1.5	<0.2	<0.13	4.82	8.89	0.088	28	1.78		
SOUTHFIELD	11/02/2006	0.82	47	0.44	49.2	1.80	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	12/09/2006	1.82	42	0.39	106.2	0.90	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	03/06/2007	0.38	68	0.08	21.8	0.38	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	04/05/2007	2.12	34	0.00	127.2	5.80	2.36	<0.88	1.1	8.0	0.88	<0.28	25.00	38.25	0.437	30	13.12		
SOUTHFIELD	05/01/2007	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	06/04/2007	1.15	49	1.12	66.0	11.80	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	07/03/2007	0.32	46	0.08	19.2	5.70	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	08/01/2007	0.42	47	0.05	28.2	8.30	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	09/04/2007	0.45	48	0.00	27.0	6.00	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	09/11/2007	0.78	43	0.10	49.8	3.80	0.31	0.05	0.1	2.0	0.08	0.05	4.58	2.81	0.011	27	0.30		
SOUTHFIELD	11/01/2007	0.89	41	0.04	51.8	4.10	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	12/04/2007	1.06	40	0.09	63.8	0.80	0.14	<0.088	0.4	0.9	0.04	0.06	2.27	3.74	0.021	33	0.71		
SOUTHFIELD	01/02/2008	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	02/04/2008	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	03/07/2008	OFF	---	---	0.0	---	---	---	---	---	---	---	---	---	---	---	0.00		
SOUTHFIELD	04/02/2008	0.87	41	0.15	82.2	0.70	0.06	<0.088	<0.038	0.3	<0.040	0.30	1.						




**LEGEND**

- ◆ DEEP MONITORING WELL
- ◇ SHALLOW MONITORING WELL
- ◆ FULLY PENETRATING MONITORING WELL
- ◆ DEEP MONITORING WELL FOR GW MONITORING PROGRAM
- ◇ SHALLOW MONITORING WELL FOR GW MONITORING PROGRAM
- † DEEP POINT OF COMPLIANCE WELL
- ◇ SHALLOW POINT OF COMPLIANCE WELL
- ◆ FULLY PENETRATING POINT OF COMPLIANCE WELL
- ▲ AIR STRIPPER (AS-2)
- ✓ VAPOR EXTRACTION WELL
- ★ RECOVERY WELL

BENCHMARK = TOP OF PIPE IN CENTER OF NORTHWEST DRIVE ENTRANCE, ELEVATION = 1322.12.





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**Shaw**  
Shaw Environmental, Inc.

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LOCATIONS OF MONITORING WELLS  
FOR GROUNDWATER MONITORING &  
POINT OF COMPLIANCE PROGRAMS

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CLIENT: NEW COLEMAN HOLDINGS

---

LOCATION: COLEMAN OPERABLE UNIT	FIGURE: 2
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Figure 16

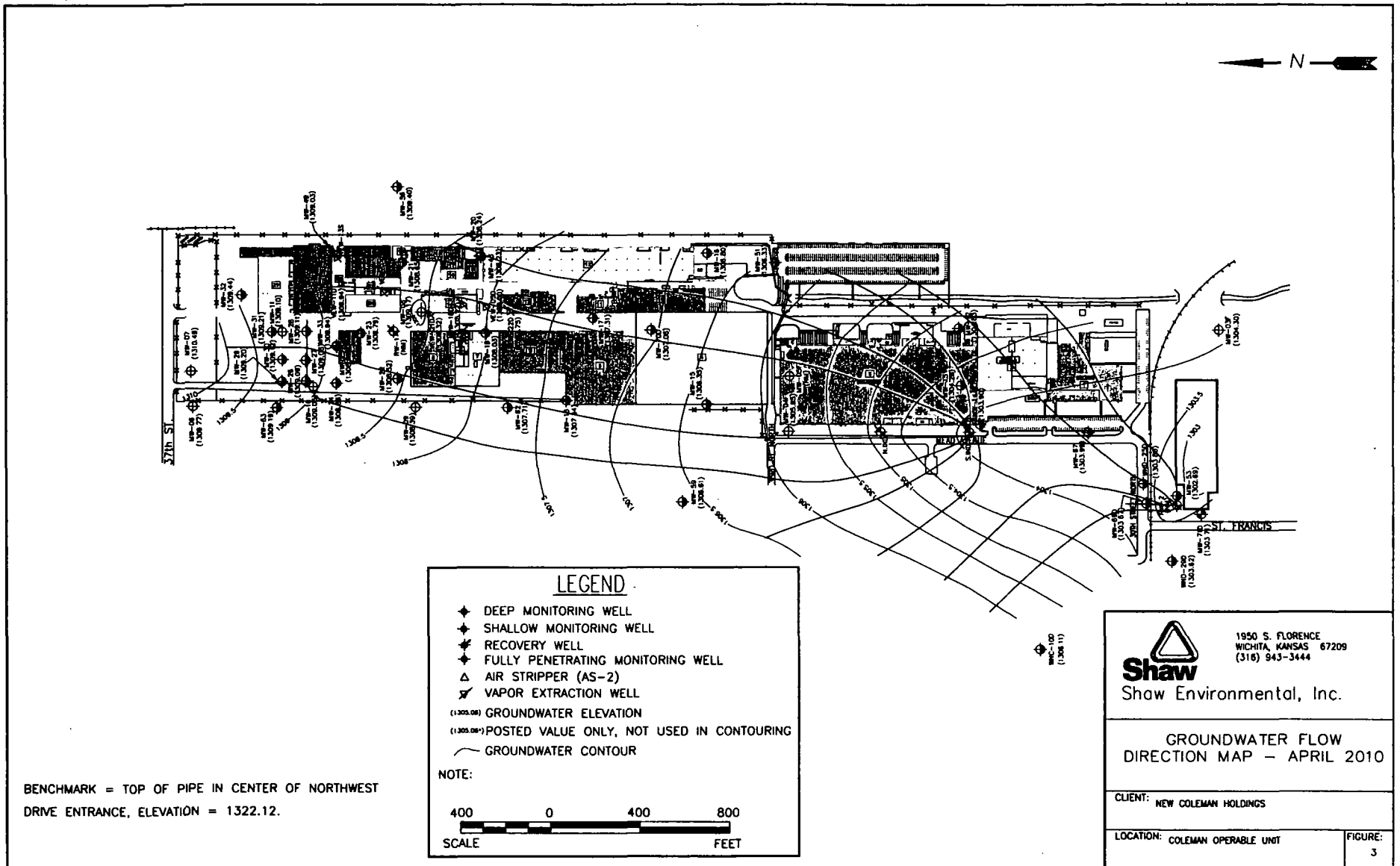


Figure 17

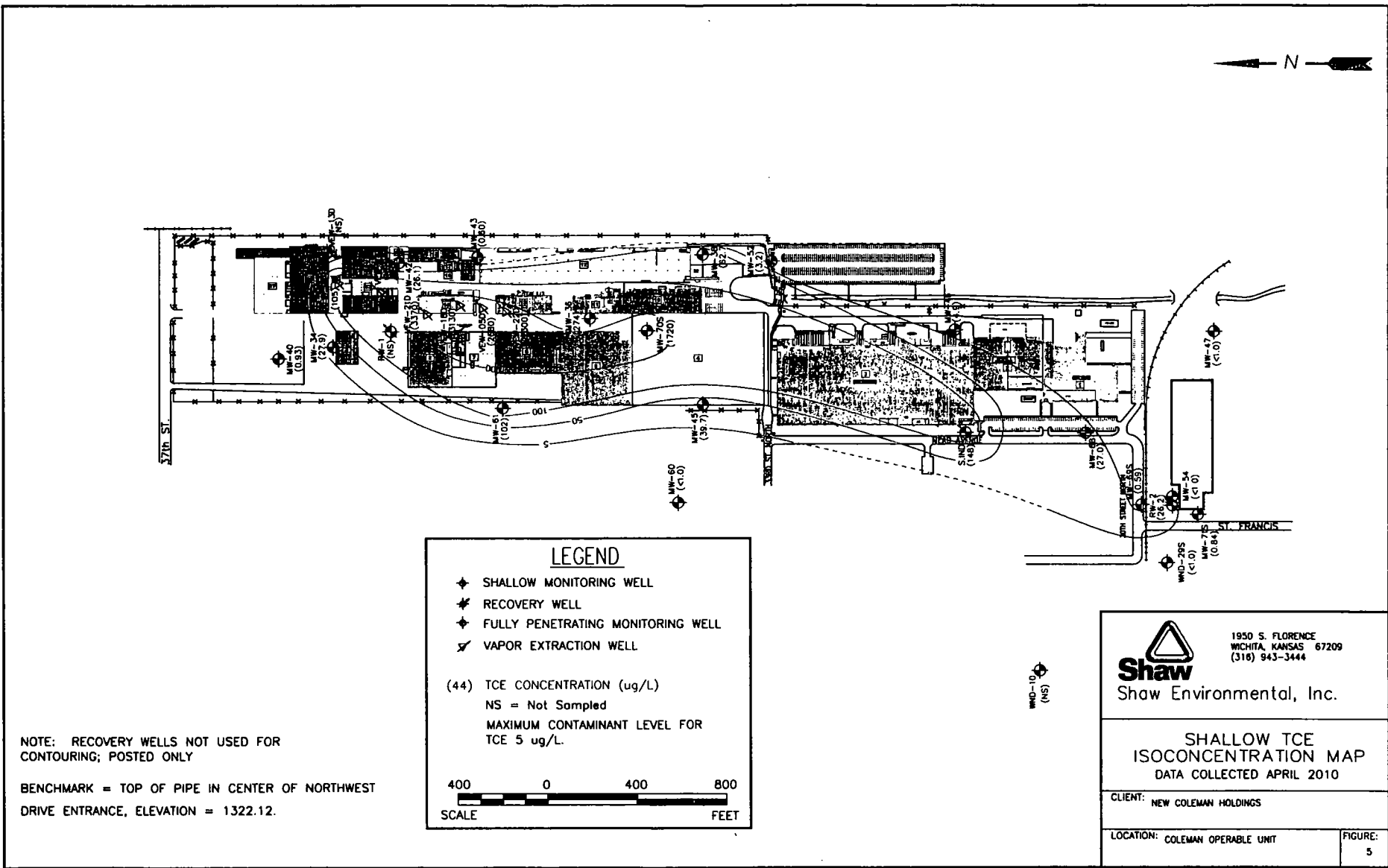


Figure 18

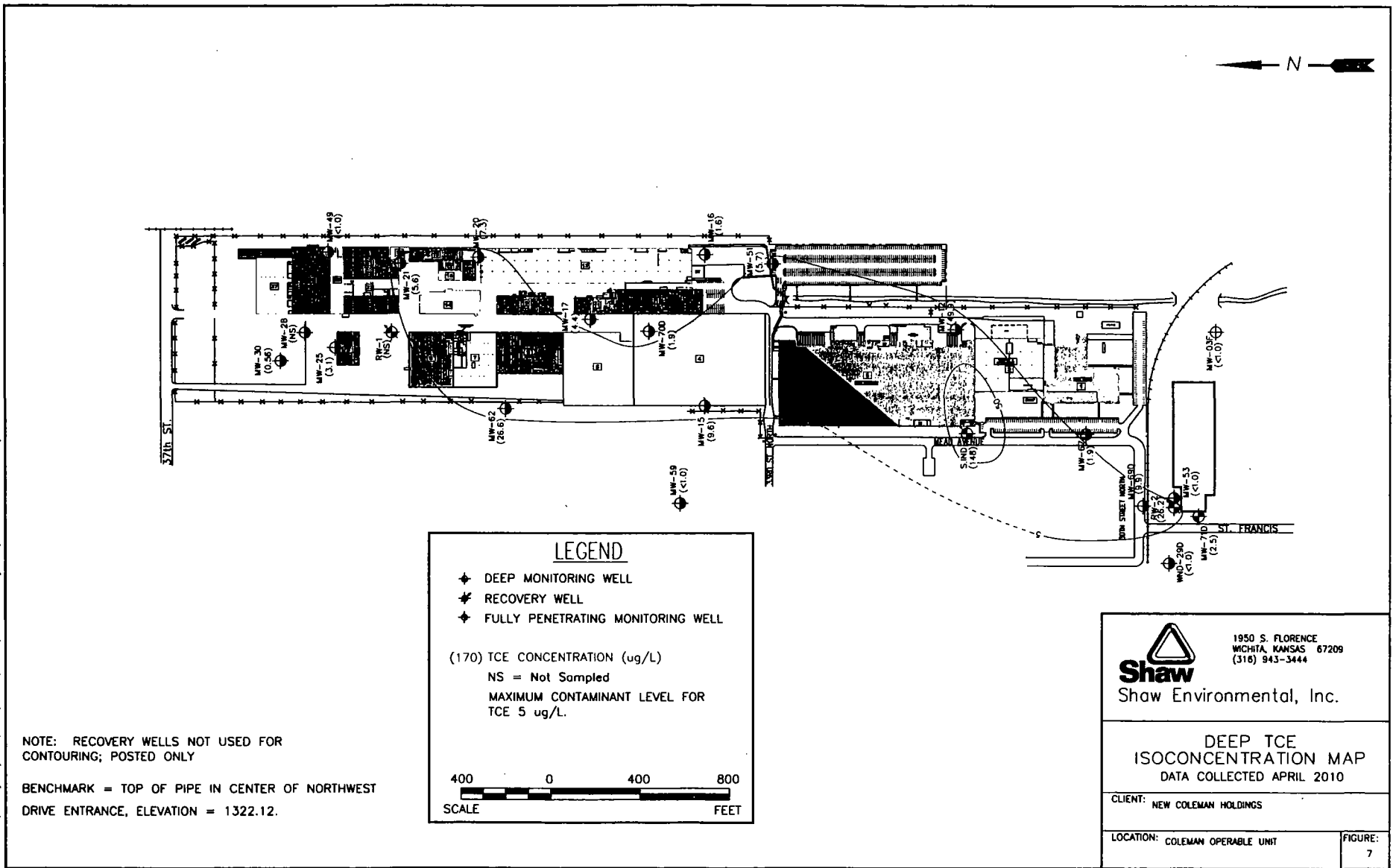


FIGURE 19