STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
00 HEINZ AVENUE, SUITE 200
BERKELEY, CALIFORNIA 94710

December 18, 1991

N60028_000061
TREASURE ISLAND
SSIC NO. 5090.3.A

Commanding Officer
Western Division
Attn: Mr. Ernesto Galang, Code 1813
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-0720

Dear Mr. Galang:

DEPARTMENT OF TOXIC SUBSTANCES CONTROL REVIEW AND COMMENT ON THE SUITABILITY STUDY OF FLOATING PRODUCT REMOVAL (DATED NOVEMBER 5, 1991) FOR THE REMEDIAL INVESTIGATION/FEASIBILITY STUDY AT NAVAL STATION TREASURE ISLAND, CALIFORNIA

On November 12, 1991 the Department of Toxic Substances Control (Department) received a copy of the above Draft Summary Report. The Department has reviewed the above document prepared by PRC Environmental Management Inc. (PRC) for the Navy. The Navy contracted PRC to study the suitability of using existing monitoring wells for extraction of contaminated petroleum products underground at the Fuel Farm Area (Site 14) and the Fire Training Area (Site 6).

The Department has reviewed your report and prepared the following comments:

COMMENTS

1. In general the existing wells are not properly maintained. Some wells have been damaged or destroyed, and these should be marked on Figures 5 and 6 in the report. The damaged wells should be properly restored or decommissioned and the well records should be adequately documented for future review.

2. PRC field crews stated that the existing wells had not been surveyed. Therefore, the elevations of tops of well casings are unknown. Without an accurate ground survey the rate and direction of ground water flow can never be known.

3. The report had inconsistent ways of describing the same well. Examples: 11 and well 11 on page 15, and well numbers on Table 6. It is very confusing!

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D/N9

4. Many acronyms appear in the report without explanation. Frequent uses of acronyms tends to confuse the reviewers.

5. The report needs more editorial work. In many places table numbers and figure numbers were cited incorrectly. Examples: Appendix "C" should be "B", and Table "4" should be "3" on page 13. Discontinuity from page 13 to 14.

6. P. 14, Section 4.4 -- The assumption of 40% average porosity for soil is too high.

7. According to the State "Leaking Underground Fuel Tank Field Manual" the level of clean up of soil at these sites are as follows, if mean annual precipitation and depth of ground water are taken into consideration (see attachment):

   1) Benzene ---------- ND
   2) Toluene ---------- ND
   3) Xylene ---------- 5 ppm
   4) Ethylbenzene --------- 6 ppm

8. PRC could have presented a discussion about the effectiveness of pumping. Other interim measures could have been recommended. All other methods of remedial action should be presented and discussed for selection of the most suitable remediation.

CONCLUSIONS

In general, the report adequately covers the stated objectives which are:

1) to collect data to estimate the amount of petroleum products at the sites;

2) to evaluate hydrogeological parameters of the underlying soils;

3) to evaluate the suitability of extraction of petroleum products using the existing wells.

The report has not, however, presented any alternative remedial actions including the cost and treatment time associated with each alternative cleanup.

RECOMMENDATIONS

Based on the preliminary estimate of this report, 24 cubic feet out of 120 cubic feet of petroleum product may be extracted from the Tank A and Tank B area, and 7.2 cubic feet out of 36

cubic feet from the Tank C area at the fire training area (FTA). This means that 96 cubic feet and 29.8 cubic feet of petroleum products will remain underground as shallow floaters in contact with ground water in these areas. Although the sizes of the plumes are still uncertain, it is well known that the sources of petroleum contaminations are the storage tanks. PRC has estimated the area extent of contamination to be 2,000 square feet around Tanks A and B, and 900 square feet around Tank C at the FTA. The extent of the contaminated surface area must be verified.

In our opinion, construction of sumps or drainage ditches near the storage tanks at both sites is a more effective interim measure. The construction may be followed by pumping to drain the contaminated ground water and the petroleum. The contaminated soil can be excavated and hauled to an authorized disposal site, then backfilled with clean earth materials. In areas where there are permanent structures and excavation is not feasible, a pumping system may be installed but this could be a lengthy and expensive process.

Please address these comments and the comments prepared by the San Francisco Regional Water Quality Control Board (SFRWQCB) on December 3, 1991 for the same Draft Summary Report. In addition, please prepare an agenda for the upcoming meeting tentatively scheduled for January 7, 1992. If you have any questions, please call me at (510) 540-3809 or leave a message in my phone mail at (510) 540-3955.

Sincerely,

Guillermo Montes
Waste Management Engineer
Site Mitigation Branch
Region 2

cc: Commanding Officer
Building One, Code 84
Attn: Mr. Jim Sullivan
Staff Civil Engineers Office
NAVSTA Treasure Island
San Francisco, California 94103

ADMIN RECORD (3 COPIES)

Ms. Barbara Smith
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

TABLE 2-4

BENZENE

ACCEPTABLE CUMULATIVE SOIL CONTAMINATION LEVELS
FOR PROTECTION OF GROUND WATER AT QUALIFIED SITES

Do not use this table unless the site in question has been screened using the applicability checklist (Table 2-2) for general risk appraisal to protect ground water

MEAN ANNUAL INCHES PRECIPITATION

	0 to 5	5.1 to 6	6.1 to 7	7.1 to 8	8.1 to 9	9.1 to 10	10.1 to 11	11.1 to 12	12.1 to 14	14.1 to 16	16.1 to 18	18.1 to 20	20.1 to 22	22.1 to 24	24.1 to 26	26.1 to 28	28.1 to 30	30.1 to 32	32.1 to 34	34.1 to 36	36.1 to 38	38.1 to 40
5-9.9	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10-14.9	5	3	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15-19.9	10	10	6	3	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20-24.9	60	40	20	10	5	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25-29.9	200	100	60	30	10	7	3	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30-34.9	800	400	200	100	40	20	10	4	1	0	0	0	0	0	0	0	0	0	0	0	0	0
35-39.9	1000	1000	700	300	100	60	20	10	3	1	0	0	0	0	0	0	0	0	0	0	0	0
40-44.9	1000	1000	1000	1000	400	100	80	30	9	2	0	0	0	0	0	0	0	0	0	0	0	0
45-49.9	1000	1000	1000	1000	1000	500	200	100	20	4	1	1	0	0	0	0	0	0	0	0	0	0
50-54.9	1000	1000	1000	1000	1000	1000	600	200	50	9	2	2	1	1	0	0	0	0	0	0	0	0
55-59.9	1000	1000	1000	1000	1000	1000	1000	700	100	20	5	3	2	1	1	0	0	0	0	0	0	0
60-64.9	1000	1000	1000	1000	1000	1000	1000	1000	300	40	9	6	4	3	2	1	1	0	0	0	0	0
65-69.9	1000	1000	1000	1000	1000	1000	1000	1000	700	80	10	10	8	5	3	2	1	1	0	0	0	0
70-74.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	100	30	20	10	9	6	4	2	1	1	0	0	0
75-79.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	300	60	40	20	10	10	7	4	2	1	1	0	0
80-84.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	100	70	40	30	10	10	7	4	2	1	1	0
85-89.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	200	100	80	50	30	10	10	7	4	2	1	0
90-94.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	400	200	100	90	50	30	10	10	6	3	2	1
95-99.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	200	100	90	50	30	10	10	5	3	1
100-104.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	400	200	100	90	50	20	10	8	4	2
105-109.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	400	200	100	80	40	20	10	7	3
110-114.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	400	200	100	70	30	10	10	5
115-119.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	200	100	50	20	10	7
120-124.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	300	100	90	40	20	10
125-129.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	500	200	100	60	30	10
130-134.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900	400	200	100	40	20
135-139.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	300	100	60	30
140-144.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	500	200	100	40
145-149.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	300	100	60
150+	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	500	200	90

Individual concentrations for any soil sample cannot exceed 100 ppm. The numbers in this table do not represent soil concentrations; they reflect the accumulation of pollutant mass in contaminated soil. These numbers can be derived from the LUFT manual worksheet (Table 2-3).

TABLE 2-5
TOLUENE
ACCEPTABLE CUMULATIVE SOIL CONTAMINATION LEVELS
FOR PROTECTION OF GROUND WATER AT QUALIFIED SITES

Stop: Do not use this table unless the site in question has been screened using the applicability checklist (Table 2-2) for general risk appraisal to protect ground water

MEAN ANNUAL INCHES PRECIPITATION

DISTANCE TO HIGHEST GROUND WATER FROM SOIL SAMPLE IN FEET	0 to 5	5.1 to 6	6.1 to 7	7.1 to 8	8.1 to 9	9.1 to 10	10.1 to 11	11.1 to 12	12.1 to 14	14.1 to 16	16.1 to 18	18.1 to 20	20.1 to 22	22.1 to 24	24.1 to 26	26.1 to 28	28.1 to 30	30.1 to 32	32.1 to 34	34.1 to 36	36.1 to 38	38.1 to 40
5-9.9	70	50	30	20	10	8	5	3	2	1	1	1	1	0	0	0	0	0	0	0	0	0
10-14.9	200	100	100	70	40	20	10	8	4	3	2	2	1	1	1	1	1	1	0	0	0	0
15-19.9	1000	600	400	200	100	60	30	10	10	6	4	3	3	2	2	2	1	1	1	1	0	0
20-24.9	1000	1000	1000	700	300	100	90	40	20	10	8	7	6	5	4	3	2	2	2	1	1	1
25-29.9	1000	1000	1000	1000	1000	500	200	100	50	20	10	10	10	9	7	5	4	3	2	2	1	1
30-34.9	1000	1000	1000	1000	1000	1000	600	200	100	50	30	20	20	10	10	9	7	5	4	3	2	1
35-39.9	1000	1000	1000	1000	1000	1000	1000	600	200	100	60	40	30	20	20	10	10	8	6	4	3	2
40-44.9	1000	1000	1000	1000	1000	1000	1000	1000	600	200	100	80	60	40	30	20	10	10	9	6	4	3
45-49.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	400	200	100	100	80	50	40	20	20	10	9	6	4
50-54.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	400	300	200	100	100	60	40	30	20	10	9	5
55-59.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	500	300	200	100	100	70	40	30	10	10	7
60-64.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	400	200	100	100	70	40	20	10	10
65-69.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	300	100	100	60	40	20	10
70-74.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	400	200	100	100	50	30	10
75-79.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	400	200	100	80	40	20
80-84.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	200	100	60	30
85-89.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	300	100	80	40
90-94.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900	400	200	100	50
95-99.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	300	100	70
100-104.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	400	200	90
105-109.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	200	100
110-114.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900	400	100
115-119.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	500	200
120-124.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	200
125-129.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	300
130-134.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	500
135-139.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600
140-144.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900
145-149.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000
150+	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000

Note: Individual concentrations for any soil sample cannot exceed 80 ppm. The numbers in this table do not represent soil concentrations; they reflect the accumulation of pollutant mass in contaminated soil. These numbers can be derived from the LUFT manual worksheet (Table 2-3).

TABLE 2-6
XYLENE
ACCEPTABLE CUMULATIVE SOIL CONTAMINATION LEVELS
FOR PROTECTION OF GROUND WATER AT QUALIFIED SITES

op: Do not use this table unless the site in question has been screened using the applicability checklist (Table 2-2) for general risk appraisal to protect ground water

MEAN ANNUAL INCHES PRECIPITATION

DISTANCE TO HIGHEST GROUND WATER FROM SOIL SAMPLE IN FEET	0 to 5	5.1 to 6	6.1 to 7	7.1 to 8	8.1 to 9	9.1 to 10	10.1 to 11	11.1 to 12	12.1 to 14	14.1 to 16	16.1 to 18	18.1 to 20	20.1 to 22	22.1 to 24	24.1 to 26	26.1 to 28	28.1 to 30	30.1 to 32	32.1 to 34	34.1 to 36	36.1 to 38	38.1 to 40
5-9.9	100	100	90	60	40	30	20	10	10	9	7	7	6	6	5	5	5	4	4	4	3	3
10-14.9	600	400	300	200	100	80	50	30	20	10	10	10	10	9	8	8	7	6	5	5	4	4
15-19.9	1000	1000	1000	600	400	200	100	70	40	20	20	10	10	10	10	10	10	9	8	7	6	5
20-24.9	1000	1000	1000	1000	1000	600	300	100	80	50	30	30	20	20	10	10	10	10	10	9	7	6
25-29.9	1000	1000	1000	1000	1000	1000	700	300	100	90	50	40	40	30	20	20	20	10	10	10	9	8
30-34.9	1000	1000	1000	1000	1000	1000	1000	700	300	100	90	70	60	50	40	30	20	20	10	10	10	9
35-39.9	1000	1000	1000	1000	1000	1000	1000	1000	600	200	100	100	100	80	60	50	40	30	20	20	10	10
40-44.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	500	200	200	100	100	90	70	50	40	30	20	10	10
45-49.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	400	300	200	100	100	100	80	60	40	30	20	10
50-54.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	500	300	200	200	100	100	80	60	40	30	20
55-59.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	600	400	300	200	100	100	80	50	30	20
60-64.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900	600	400	300	200	100	100	70	40	30
65-69.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	300	200	100	90	60	40
70-74.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	400	200	100	100	70	50
75-79.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	400	200	100	90	60
80-84.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900	500	300	200	100	70
85-89.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	200	100	90
90-94.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	300	100	100
95-99.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	400	200	100
100-104.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	500	300	100
105-109.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	200
110-114.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900	500	200
115-119.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	300
120-124.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	300
125-129.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	400
130-134.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	500
135-139.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600
140-144.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800
145-149.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000
150+	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000

ote: Individual concentrations for any soil sample cannot exceed 40 ppm. The numbers in this table do not represent soil concentrations; they reflect the accumulation of pollutant mass in contaminated soil. These numbers can be derived from the LUFT manual worksheet (Table 2-3).

TABLE 2-7
ETHYLBENZENE
ACCEPTABLE CUMULATIVE SOIL CONTAMINATION LEVELS
FOR PROTECTION OF GROUND WATER AT QUALIFIED SITES

p: Do not use this table unless the site in question has been screened using the applicability checklist (Table 2-2) for general risk appraisal to protect ground water

MEAN ANNUAL INCHES PRECIPITATION

	0 to 5	5.1 to 6	6.1 to 7	7.1 to 8	8.1 to 9	9.1 to 10	10.1 to 11	11.1 to 12	12.1 to 14	14.1 to 16	16.1 to 18	18.1 to 20	20.1 to 22	22.1 to 24	24.1 to 26	26.1 to 28	28.1 to 30	30.1 to 32	32.1 to 34	34.1 to 36	36.1 to 38	38.1 [illegible]
5-9.9	300	200	100	100	70	40	30	20	10	10	10	9	8	8	7	6	6	5	5	5	4	4
10-14.9	1000	800	500	300	200	100	70	40	30	20	10	10	10	10	9	8	8	7	6	5	5	5
15-19.9	1000	1000	1000	1000	500	300	100	90	50	30	20	20	20	10	10	10	10	10	9	8	7	6
20-24.9	1000	1000	1000	1000	1000	800	400	200	100	60	40	30	30	20	20	20	10	10	10	10	8	[illegible]
25-29.9	1000	1000	1000	1000	1000	1000	1000	400	200	100	70	50	40	40	30	20	20	10	10	10	10	9
30-34.9	1000	1000	1000	1000	1000	1000	1000	900	400	100	100	90	70	60	50	40	30	20	20	10	10	[illegible]
35-39.9	1000	1000	1000	1000	1000	1000	1000	1000	800	300	100	100	100	90	70	50	40	30	20	20	10	[illegible]
40-44.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	300	200	100	100	100	80	60	40	30	20	20	[illegible]
45-49.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	400	300	200	200	100	100	80	60	40	30	20	[illegible]
50-54.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	500	400	300	200	100	100	80	60	40	30	[illegible]
55-59.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900	600	400	300	200	100	100	80	50	40	[illegible]
60-64.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	500	300	200	100	100	70	50	[illegible]
65-69.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	300	200	100	90	60	[illegible]
70-74.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	200	100	100	70	[illegible]
75-79.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	400	200	100	90	[illegible]
80-84.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	500	300	100	100	[illegible]
85-89.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	200	100	[illegible]
90-94.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900	500	300	100	[illegible]
95-99.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	700	400	200	[illegible]
100-104.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900	500	200	[illegible]
105-109.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	600	300	[illegible]
110-114.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	800	400	[illegible]
115-119.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	500	[illegible]
120-124.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	[illegible]	[illegible]
125-129.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	[illegible]	[illegible]
130-134.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	[illegible]
135-139.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	[illegible]
140-144.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	[illegible]
145-149.9	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	[illegible]
150+	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	[illegible]

DEPTH TO GREST SOIL SAMPLE IN FEET

e: Individual concentrations for any soil sample cannot exceed 40 ppm. The numbers in this table do not represent soil concentrations; they reflect the accumulation of pollutant mass in contaminated soil. These numbers can be derived from the LUFT manual worksheet (Table 2-3).