

(804) 322-4778

5090

18222:BRN:clm

27 JUN 1995

U.S. Environmental Protection Agency
Attn: Mr. Robert G. Thomson, P.E.
Remedial Project Manager (3HW71)
VA/WV Superfund Federal Facilities Section
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Re: Navy Final Recommendation for Areas of Concern,
Naval Weapons Station, Yorktown, Virginia

Dear Mr. Thomson:

After a meeting with Messrs. Jeff Harlow and Bernie Setterholm of WPNSTA Yorktown and Ms. Brenda Norton of this Command on April 21, 1995, a typed version of the Navy's Strategy for Investigation for Areas of Concern (AOCs) was forwarded to all parties by facsimile on May 4, 1995. Since then, you and Mr. Steve Mihalko of the VDEQ visited the WPNSTA Yorktown on May 17 and 18, 1995 at which time you received and reviewed additional data concerning the outstanding AOCs. A second meeting was held on May 25, 1995 at LANTDIV with the WPNSTA Yorktown environmental staff to update the AOC list based on this new data and to revise the strategy. Based on this revised strategy, sampling of specific AOCs was conducted by Baker Environmental on May 31 and June 1, 1995.

Attached are the results of the sampling event and sketches showing sampling locations which were considered as the site specific work plans. The Master Work Plans for WPNSTA Yorktown were followed for overall quality assurance. Based on these sample results, the Navy position on each of the AOCs is outlined on the attached AOC DETERMINATION/EVALUATION. Please complete your desk top evaluation of all of the enclosed information and provide your concurrence or justification for further investigation under the Site Screening Process.

As noted by paragraph 9.3.D. of the Federal Facilities Agreement, the Navy is requesting the 120-day finalization date for AOCs #1, 3, 4, 12, 13, 15, 17, 20 and 21 be extended for 30 days after receipt of this supporting documentation which allows for a full 30 days of review, discussion, and response time for the EPA and the VDEQ. Should the EPA and the VDEQ require the full 30 day review for these AOCs, the finalization date will be July 26, 1995.

Re: Navy Final Recommendation for Areas of Concern,
Naval Weapons Station, Yorktown, Virginia

If you have any questions, please contact Mrs. Brenda R. Norton,
P.E., at (804) 322-4778.

Sincerely,

P. A. RAKOWSKI, P.E.
Head
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Attachments

Copy to:
WPNSTA Yorktown (09E)
VDEQ (Mr. Steve Mihalko)

Blind copy to:
1822 (NMJ)
1822 (BRN)
1822 (Admin Record)
18S
AOCUPDT.BRN

NAVY'S FINAL DETERMINATION/EVALUATION
FOR
AREAS OF CONCERN AT WPNSTA YORKTOWN

- AOC#1 - NFA - No further action due to non-detection for PCBs. See Table (1) and Attachment (1).
- AOC#2 - NFA - No further action. See Attachment (2). This separator is the same as what WPNSTA Yorktown considers as the O/W separator near Building 1690. A certification is included showing the O/W Separator is in very good condition.
- AOC#3 - NFA - No further action. See Table 2 and Attachment (3). No detection's above RBCs or background. See Report entitled *Summary of Background Constituent Concentrations and Characterization of the Biotic Community from the York River Drainage Basin* dated April 1995 for background information.
- AOC#4 - Analytical results shows high lead levels within the grit pile itself (AOC4SS01) but decreasing levels down gradient (AOC4SS03). The lead level within the grit pile requires limited interim controls depending on site-specific conditions such as use patterns, populations at risk and other factors. This guidance is taken from OSWER Directive #9355.4-12 dated 14 July 1994. There are also other inorganics that exceed residential RBC values. With the analytical results showing a possible risk and the grit pile being so small, it is recommended that the area continue to be an AOC and that Public Works Department at WPNSTA Yorktown be allowed to remove the pile, do confirmatory sampling, and forward results to EPA and the Commonwealth prior to October 6, 1995. If the removal action is successful and the confirmation sampling results are lower than regulatory guidelines, then this area of concern can be considered for no further action. If the removal action does not occur by October 6, 1995 or if the analytical data from confirmatory sampling continues to shows a risk, then the AOC will automatically become a Site Screening Area as per the FFA. See Table 2 and Attachment (4).
- AOC#5 - No action until 6 Oct 1995 per EPA letter of 11 Apr 95.
- AOC#6 - No action until 6 Oct 1995 per EPA letter of 11 Apr 95.
- AOC#7 - No action until 6 Oct 1995 per EPA letter of 11 Apr 95.

- AOC#8 - NFA. No further action based on WPNSTA Yorktown letter of 6 June 1995 to EPA Region III with documentation recommending no further action.
- AOC#9 - NFA. No further action per EPA Region III letter of 11 April 1995.
- AOC#10 - NFA. No further action per EPA Region III letter of 11 April 1995.
- AOC#11 - NFA. No further action per EPA Region III letter of 11 April 1995.
- AOC#12 - NFA. No further action based on WPNSTA Yorktown letter of 6 June 1995 to EPA Region III with documentation recommending no further action.
- AOC#13 - NFA. No further action based on WPNSTA Yorktown letter of 6 June 1995 to EPA Region III with documentation recommending no further action.
- AOC#14 - NFA. No further action based on WPNSTA Yorktown letter of 6 June 1995 to EPA Region III with documentation recommending no further action.
- AOC#15 - NFA. No further action based on analytical results which were below residential RBC values. See Table 3 and Attachment (5).
- AOC#16 - NFA. No further action per EPA Region III letter of 11 April 1995.
- AOC#17 - NFA. No further action based on analytical results from two surface water samples and two soil samples. See Tables 2 and 4 and Attachment (6). Area of Concern Number #17 (AOC#17) soil samples exhibited exceedances of Residential Risk Based Concentration (RBC) values for beryllium and arsenic. Arsenic and beryllium were detected at maximum concentrations of 12 mg/Kg and 1.1 mg/Kg, respectively, in soil sample SS01. Because only two soil samples were obtained from AOC 17, maximum detected concentrations of arsenic and beryllium were subjected to a limited risk screening using the residential RBC values of 0.71 mg/Kg (arsenic) and 0.15 mg/Kg (beryllium). The corresponding ICR value derived by risk screening was 4×10^{-5} , which falls within USEPA's generally acceptable target risk range.

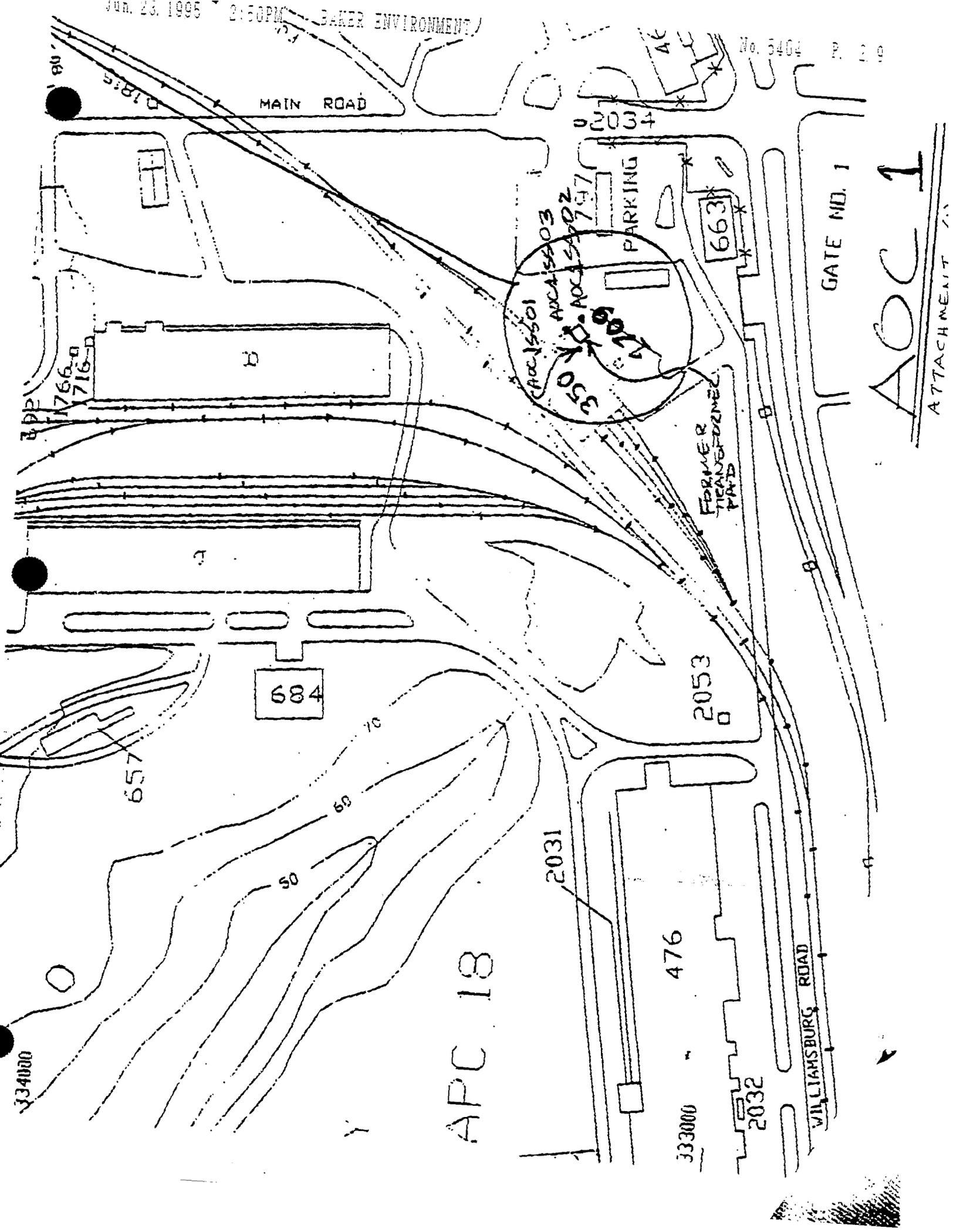
Manganese was also detected in soil sample SS02 at a concentration which exceeds its corresponding RBC value. However, manganese does not exceed station-wide background concentrations which ranges from 7.6 mg/Kg to 491 mg/Kg.

As a result of the limited risk screening and comparison to background, no further action is warranted for AOC 17.

- AOC#18 - NFA. No further action based on WPNSTA Yorktown letter of 6 June 1995 to EPA Region III with documentation recommending no further action.
- AOC#19 - NFA. No further action based on WPNSTA Yorktown letter of 6 June 1995 to EPA Region III with documentation recommending no further action.
- AOC#20 - NFA. No further action based on analytical results which are below residential RBC values. See Table 3 and 5 and Attachment (7).
- AOC#21 - NFA. See Table 2 for analytical results and attachment (8) for sample locations. Area of Concern Number #21 (AOC#21) soil samples exhibited exceedances of Residential RBC values for arsenic and beryllium. Arsenic and beryllium were detected at a maximum concentrations of 160 mg/Kg and 1.1 mg/Kg, respectively, in soil sample SS04.

Composite samples (SS03 and SS06) of coal were taken at three coal pile locations in order to determine if coal was a potential source of contamination. However, the composite samples do not contain high concentrations of either arsenic or beryllium. The maximum detected concentrations of arsenic and beryllium were used in the determination of the arithmetic average concentrations at AOC 21. Arsenic and beryllium concentrations averaged 25.3 mg/Kg and 0.45 mg/Kg, respectively. These concentrations were subjected to a limited risk screening using the most recent RBC values for arsenic (0.37 mg/Kg) and beryllium (0.15 mg/Kg). The risk screening entailed dividing the maximum concentrations of arsenic and beryllium by their respective RBC, adding the results and then multiplying the sum by 1×10^{-6} . The potential risk to residents consuming affected soils calculated using risk screening was 7.1×10^{-5} , of which, 96 percent of the risk was attributable to arsenic. When the maximum detected arsenic value is censored, the arithmetic average concentration of arsenic associated with AOC#21 soils is 2.9 mg/Kg, which produces a risk of 8×10^{-6} .

Because arithmetic average concentrations of arsenic and beryllium do not pose unacceptable health risks, no further action is recommended for AOC#21.



AOC 1
ATTACHMENT 2

APC 18

GATE NO. 1

WILLIAMSBURG ROAD

684

2053

476

2032

PARKING

FORMER R.
TRANSFORMER
PAD

APC 18501
APC 18503
APC 18502
APC 18507

657

50

60

70

B

766-D
716-D

334000

333000

2031

2034

663

90'

15:5

MAIN ROAD

400-2
400-12

8 May 1995

MEMORANDUM

From: Code 0922C
To: Code 09E18

Subj: OIL/WATER SEPARATORS

1. As requested, I am providing information on the structural integrity of the subject separators obtained from visual inspections. See the enclosed Inspection Reports on separators near Bldgs. 350, 710, 683, and 1690. The separator near Bldg. 1690 is also near Bldg. 372 and is listed as such in your files.
2. Two other separators in question are near Bldgs. 370 and 457. The separator at Bldg. 370 was taken out of operation when the building was demolished in the spring of 1994. The work was done by a Contractor through a Construction Contract and the separator was cleaned and filled with concrete. The separator near Bldg. 457 was replaced with a new separator in the summer of 1994. This work was done by a Contractor under a Construction Contract as well. It is assumed that the integrity of the separator is excellent because it is new and still under warranty.
3. The separator at Bldg. 118 was cleaned by a Contractor several years ago but we do not have any records indicating the structural integrity. It is likely that we would have been notified if there had been a significant leak or problem but there is no documentation on it. Currently, Bldg. 118 is slated to be taken off line in the summer of 1996 and the oil/water separator will not be operational after that date.
4. If further information is needed, please let me know. I can be reached at ext. 4124 or E-Mail Address THOMPSONB.

Beverly Thompson

Beverly C. Thompson

Copy:

- Code 09D
- Code 09E
- Code 092
- Code 09E1
- Code 0922C1
- ENVI FILE

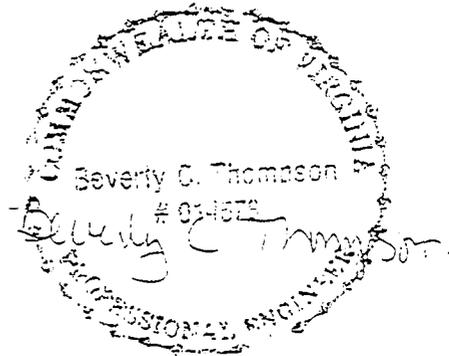
ACC-2

OIL/WATER SEPARATOR NEAR BLDG. 1690 (same oil sep as bldg. 372)

1. Visually inspected after cleaning 1 Sept 94 by Bev Thompson (PW Engineering at ext. 4124).
2. This separator has only one compartment. There were no cracks or fissures visible. Concrete appeared to be sound with no spalling or crumbling.
3. In general, the casing is in vey good condition.

Beverly C. Thompson

Beverly C. Thompson



ATTACHMENT (2)

S.O. No. _____

Subject: NWS VORPTOWN

AOC SAMPLING

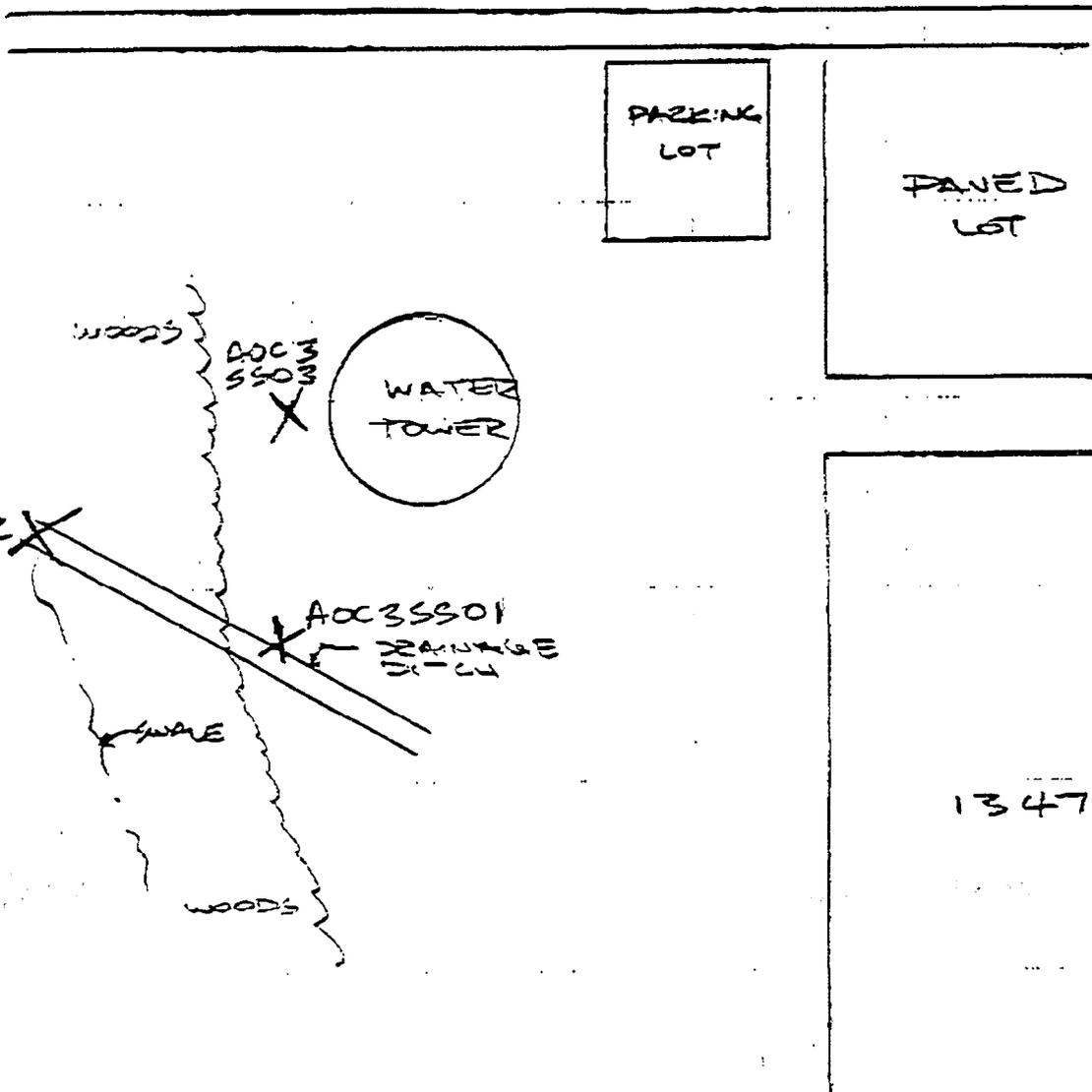
AOC 3 LOCATIONS

Computed by MGT Checked By _____

Sheet No. _____ of _____

Drawing No. _____

Date 6/23/95



N.T.S.

AOC 3

ATTACHMENT (3)

AOC 4

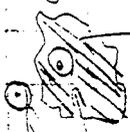
ISOLL MAN RN

GET DISPOSAL AREA

530

DUST COLLECTED

SAMPLES



S.O. No. _____

Subject: NWS YORKTOWN

AOC SAMPLING

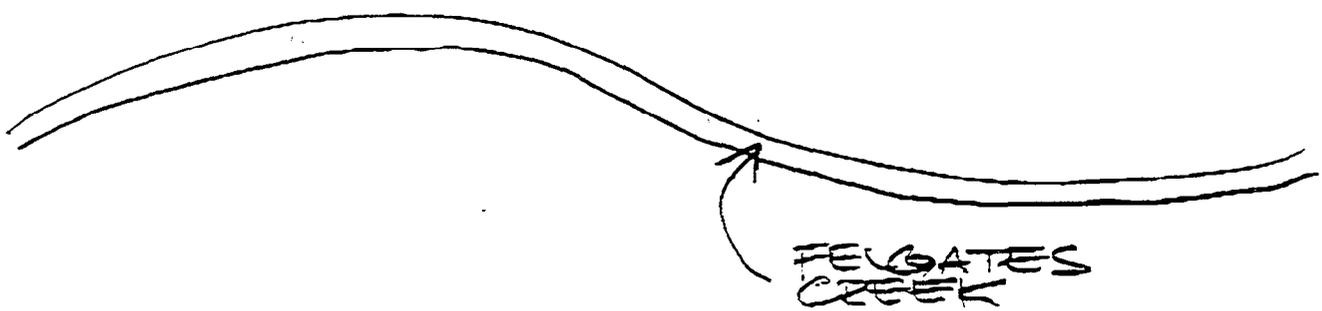
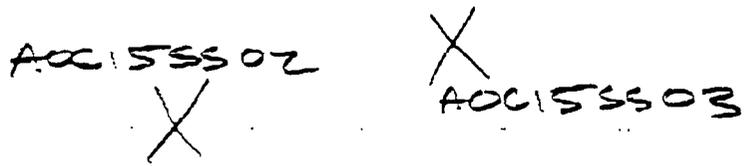
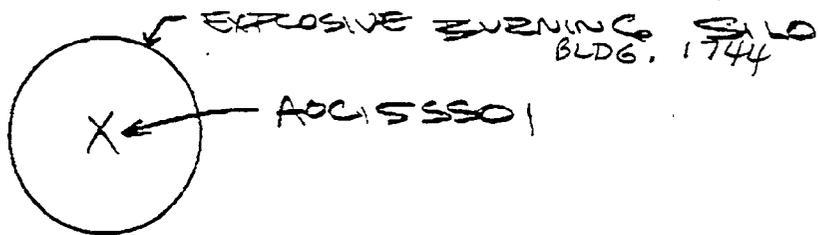
AOC 15 LOCATIONS

Sheet No. ___ of ___

Drawing No. ___

Computed by MGT Checked By _____

Date 6/23/95



N.T.S.

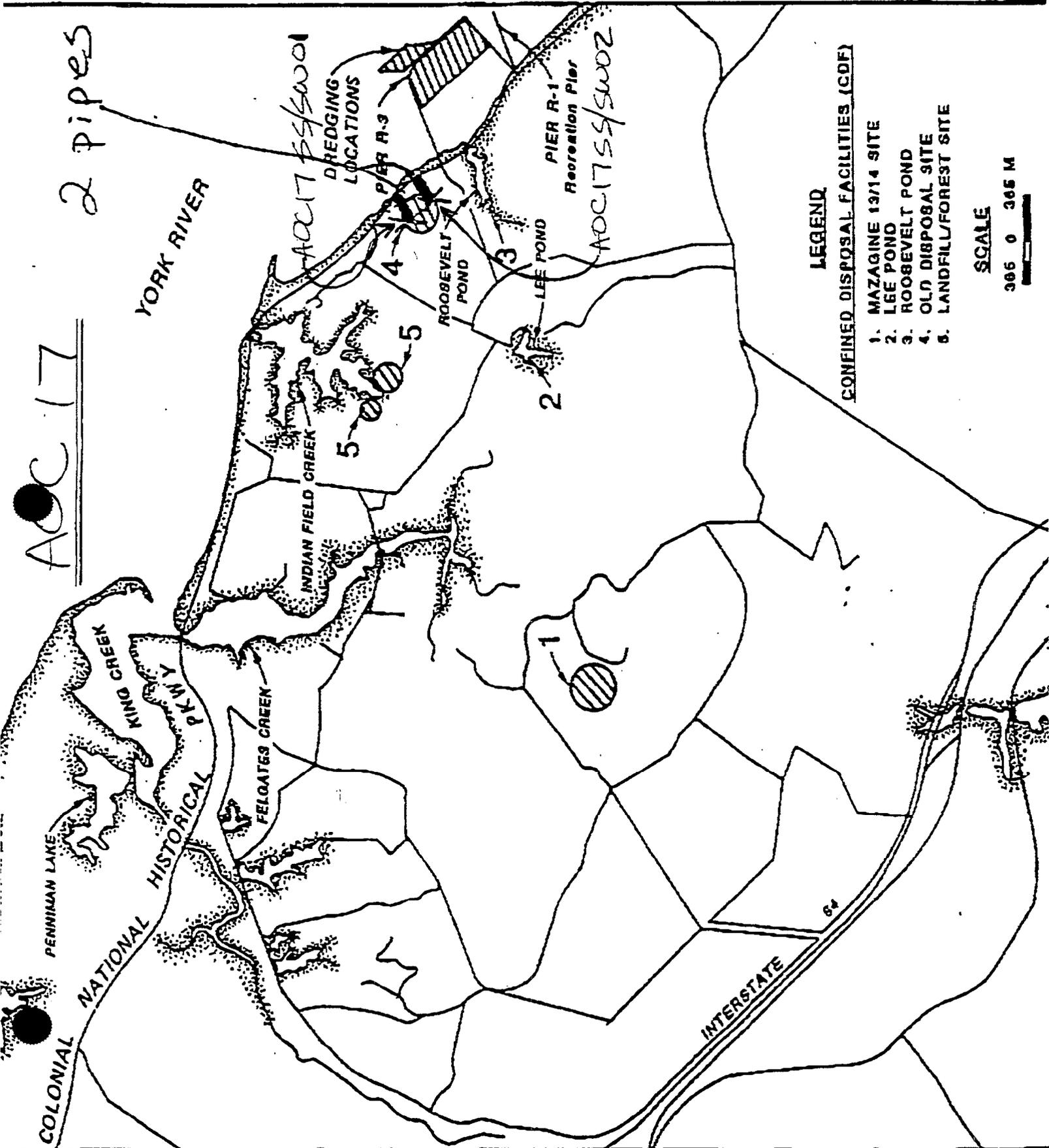
AOC 15
ATTACHMENT (5)

AOC 17

2 pipes

AOC 17 S/S w/1

AOC 17 S/S w/2



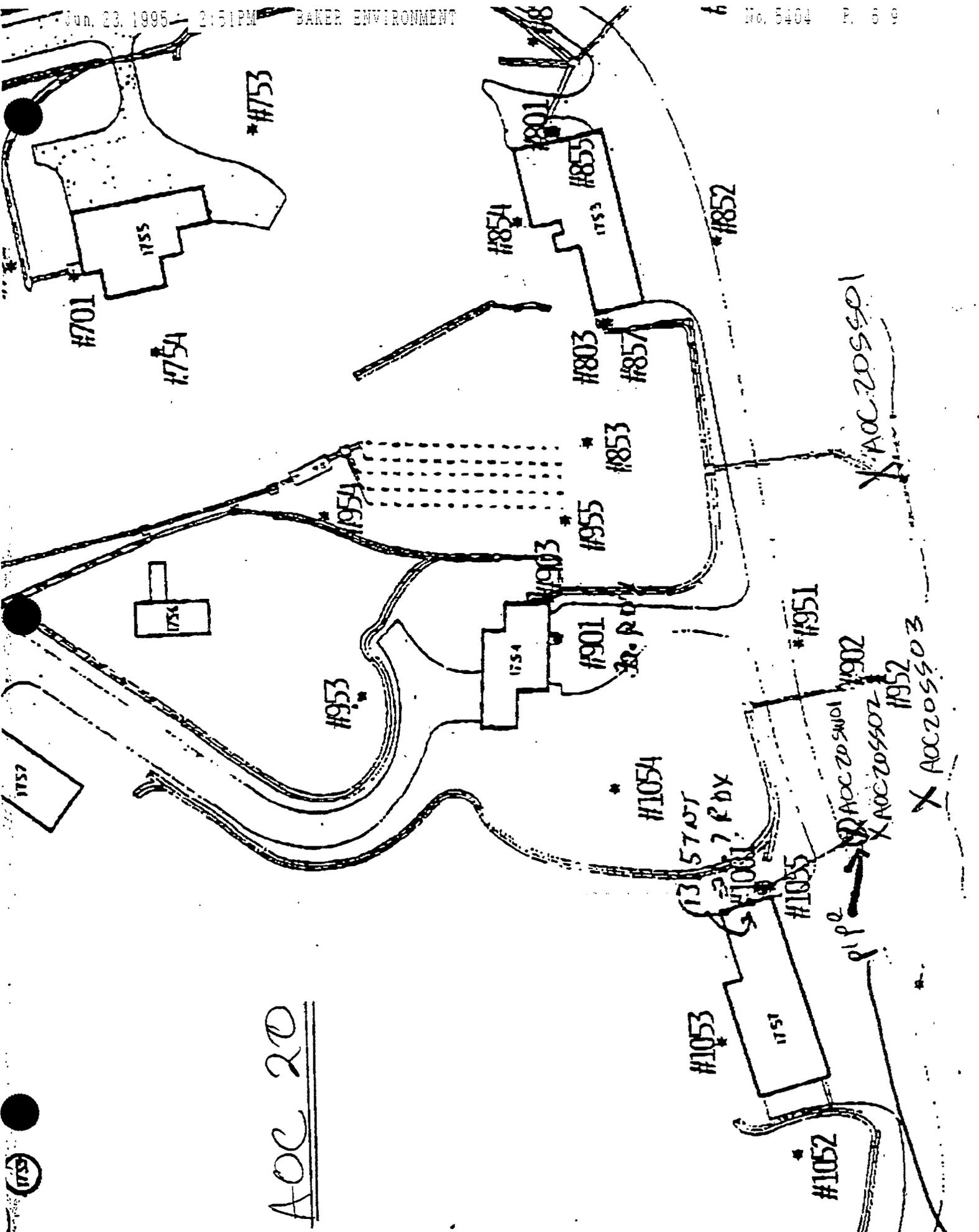
LEGEND

CONFINED DISPOSAL FACILITIES (CDF)

- 1. MAZAGINE 13/14 SITE
- 2. LEE POND
- 3. ROOSEVELT POND
- 4. OLD DISPOSAL SITE
- 5. LANDFILL/FORREST SITE

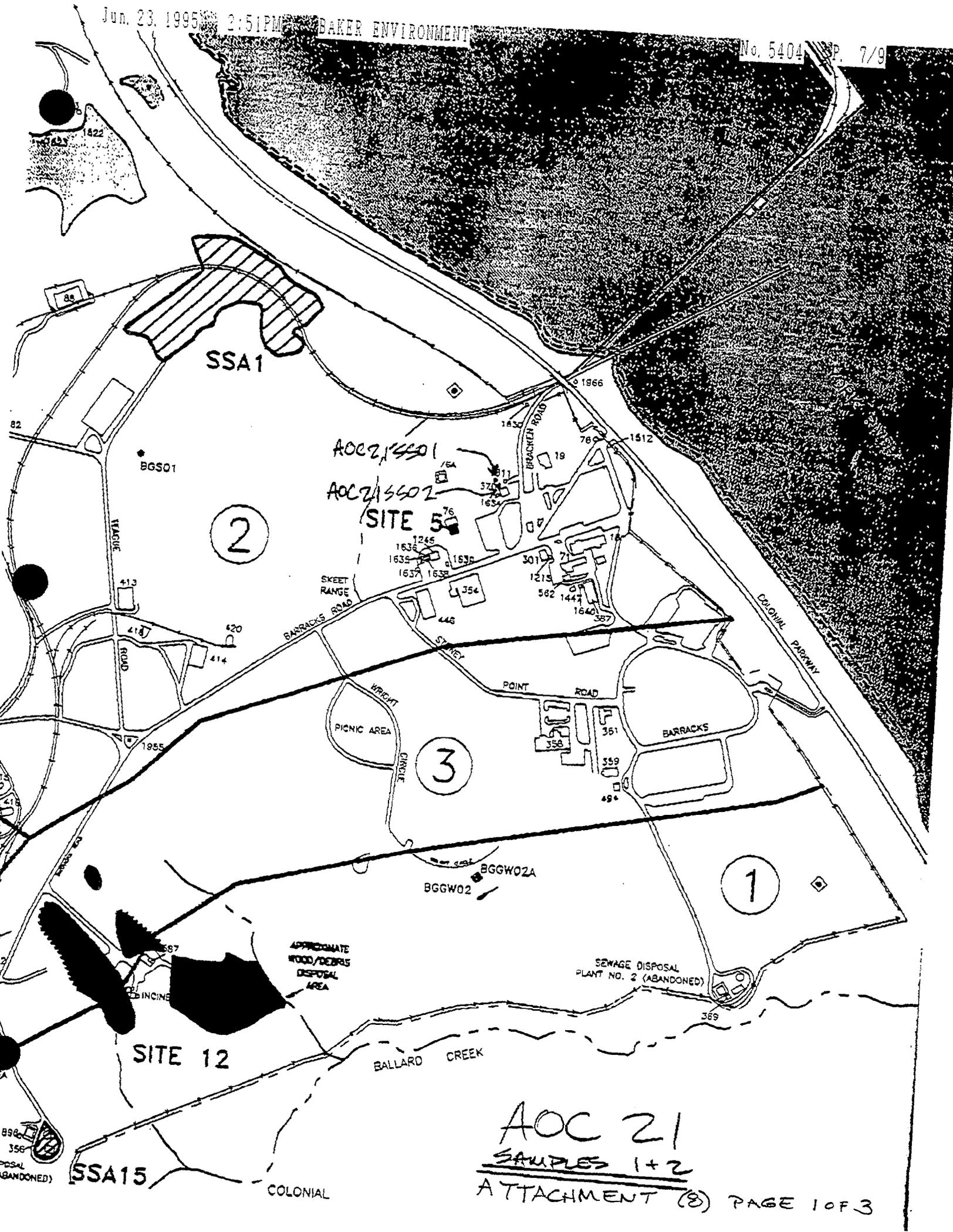
SCALE

305 0 365 M



AOC 20

X AOC 20 5501
 X AOC 20 5502
 X AOC 20 5503
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 X AOC 20 5597
 X AOC 20 5598
 X AOC 20 5599
 X AOC 20 5600



AOC 21
SAMPLES 1+2
 ATTACHMENT (8) PAGE 10 OF 3

S.O. No. _____

Subject: NWS YORKTOWN

AOC SAMPLING

Sheet No. of

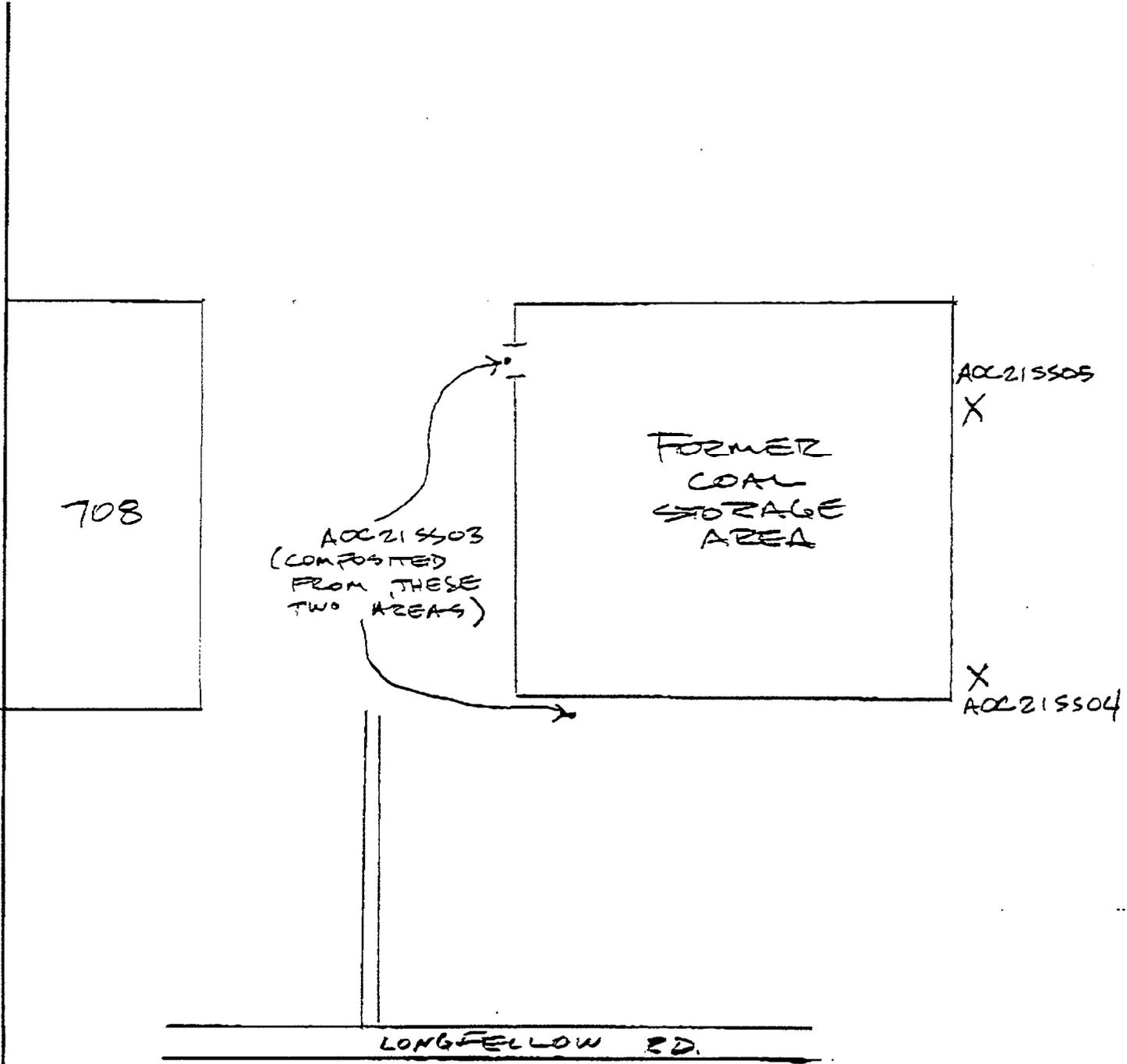
AOC 21 (SAMPLES 3,4,5) LOCATIONS

Drawing No.

Computed by MCT

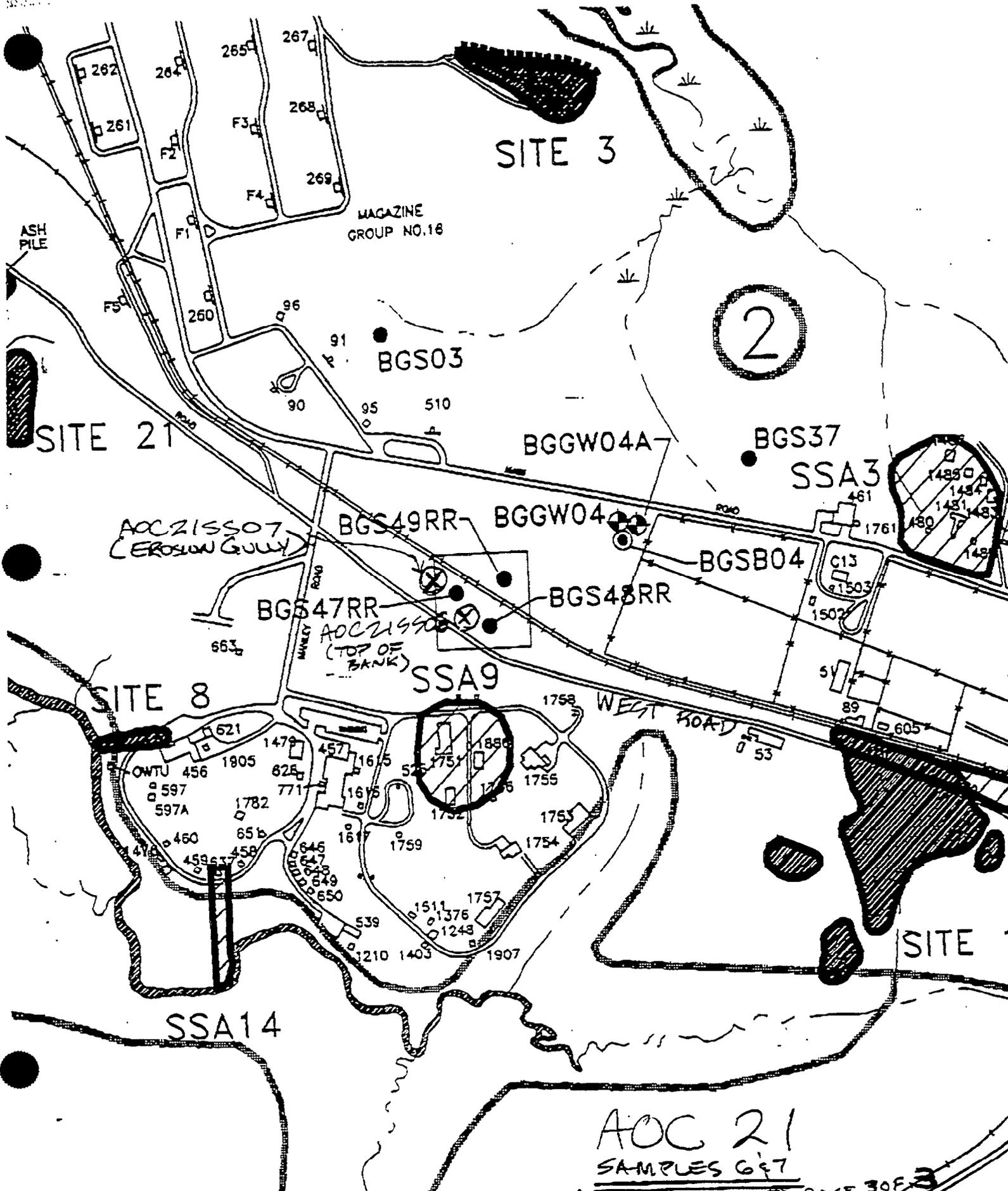
Checked By _____

Date 6/23/95



N.T.S.

AOC 21
SAMPLE 3+4+5



**TABLE 1
AREA OF CONCERN NUMBER 1
POLYCHLORINATED BIPHENYLS IN SOIL**

AREA OF CONCERN	1		
Sample I.D. Units	AOC1SS01 mg/Kg	AOC1SS02 mg/Kg	AOC1SS02 mg/Kg
PCBs(ENSYs)	1 U	1 U	1 U

NOTES: mg/Kg - milligrams per kilogram

U - not detected

PCBs analyzed using ENSYS test kits at 1ppm and 10 ppm limits
of detection.

TABLE 2
AREAS OF CONCERN NUMBERS 3, 4, 17, AND 21
INORGANIC ANALYTICAL RESULTS FOR SOIL SAMPLES

AREA OF CONCERN	3			4			17	
Sample ID Units	AOC3SS01 mg/Kg	AOC3SS02 mg/Kg	AOC3SS03 mg/Kg	AOC4SS01 mg/Kg	AOC4SS02 mg/Kg	AOC4SS03 mg/Kg	AOC17SS01 mg/Kg	AOC17SS02 mg/Kg
Aluminum	11000	2600	7100	970	2400	1900	11000	15000
Antimony	4.7 U	4.5 U	4.6 U	13	22	11	6.3 U	7.5 U
Arsenic	1.4	1.3	3.8	41	14	3.4	12	6.6
Barium	26	15 U	18	190	130	73	27	38
Beryllium	0.38 U	0.38 U	0.38 U	0.45	0.36 U	0.44	1.1	1
Cadmium	0.38 U	0.38 U	0.38 U	120	30	12	0.52 U	0.89
Calcium	1400	550	380 U	630	40000	1100	3000	4200
Chromium	13	7.7	16	1600	340	160	27	34
Cobalt	3.8 U	3.8 U	3.8 U	28	9	4.2	7.8	9.1
Copper	3.4	15	5.2	650	220	120	8.1	11
Iron	22000	7500	14000	320000	76000	19000	33000	25000
Lead	11	30	17	3100	600	290	19	23
Magnesium	430	380 U	380 U	350 U	470	370 U	3400	4000
Manganese	19	44	9.2	1500	330	100	250	450
Mercury	0.12 U	0.11 U	0.16 U	0.19 U				
Nickel	3.1 U	3.1 U	3.1 U	180	53	18	14	14 U
Potassium	470	380 U	480	350 U	360 U	370 U	2000	2500
Selenium	0.38 U	0.38 U	0.38 U	0.35 U	0.36 U	0.37 U	0.52 U	0.62 U
Silver	0.78 U	0.76 U	0.77 U	0.72 U	0.73 U	0.75 U	1 U	1.3 U
Sodium	380 U	380 U	380 U	350 U	430	370 U	520 U	620 U
Thallium	0.78 U	0.76 U	0.77 U	0.72 U	0.73 U	0.75 U	1 U	1.3 U
Vanadium	28	11	29	42	17	11	33	38
Zinc	11	97	52	7700	1400	960	72	130
Tot. CN	0.58 U	0.57 U	0.57 U	11	4.8	0.78 U	0.78 U	0.94 U

TABLE 2 cont.
 AREAS OF CONCERN NUMBERS 3, 4, 17, AND 21
 INORGANIC ANALYTICAL RESULTS FOR SOIL SAMPLES

AREA OF CONCERN	21							
Sample ID Units	AOC21SS01 mg/Kg	AOC21SS02 mg/Kg	AOC21SS03 mg/Kg	AOC21SS04 mg/Kg	AOC21SS05 mg/Kg	AOC21SS06 mg/Kg	AOC21SS07 mg/Kg	Residential RBC mg/Kg
Aluminum	56	8800	780	4400	4600	4400	100	78000 n
Antimony	4.1 U	4.7 U	4 U	4.9 U	4.8 U	4.3 U	4 U	31 n
Arsenic	1.3	2.6	0.68 U	160	6.6	6.2	0.68 U	23/0.37 n/c
Barium	13 U	65	25	23	35	22	13 U	5500 n
Beryllium	0.34 U	0.38 U	0.74	1.2	0.48	0.35 U	0.33 U	0.15 c
Cadmium	0.34 U	0.38 U	0.33 U	2.3	0.4 U	0.35 U	0.33 U	39 n
Calcium	340 U	3500	430	1700	930	1900	330 U	NA
Chromium	0.69 U	11	5.2	10	5.3	7.1	1.4	390 n
Cobalt	3.4 U	3.8 U	3.3 U	4.4	4 U	3.5 U	3.3 U	4700 n
Copper	1.8 U	14	9.8	30	7.1	12	1.7	2900 n
Iron	200	4500	1400	28000	6000	9600	240	NA
Lead	7.4	130	2.4	37	14	6.5	1.5	400 A
Magnesium	340 U	590	330 U	410 U	400 U	1800	330 U	390 n
Manganese	1 U	29	2	43	16	160	3	390 n
Mercury	0.1 U	0.19	0.1 U	0.12 U	0.12 U	0.11 U	0.1 U	23 n
Nickel	2.8 U	5.3	5.9	17	7.5	5.4	2.8	1600 n
Potassium	340 U	380 U	330 U	410	400 U	350 U	330 U	NA
Selenium	0.59	0.38 U	0.55	7	0.4 U	0.38	0.44	390 n
Silver	0.69 U	0.78 U	0.68 U	0.83 U	0.81 U	0.71 U	0.68 U	390 n
Sodium	340 U	380 U	330 U	410 U	400 U	350 U	330 U	NA
Thallium	0.69 U	0.78 U	0.68 U	0.83 U	0.81 U	0.71 U	0.68 U	6.3 n
Vanadium	3.9	14	9.2	210	42	18	3.3 U	550 n
Zinc	2	74	6.8	75	25	38	5.9	23000 n
Tot. CN	0.52 U	0.58 U	0.51 U	0.62 U	0.6 U	0.53 U	0.51 U	1600 n

NOTES: mg/Kg milligrams per kilogram
 A - USEPA Action Level
 c - carcinogenic
 n - noncarcinogenic
 NA - not applicable
 RBC - Risk Based Concentration
 U - not detected

TABLE 3
AREA OF CONCERN NUMBERS 15 AND 20
NITRAMINES/NITROAROMATICS IN SOILS

AREA OF CONCERN	15			20			Residential RBC ug/Kg
Sample I.D. Units	AOC15SS01 ug/Kg	AOC15SS02 ug/Kg	AOC15SS03 ug/Kg	AOC20SS01 ug/Kg	AOC20SS02 ug/Kg	AOC20SS03 ug/Kg	
HMX	1100 J	1100 U	3900000 n				
RDX	4300	520 U	540 U	540 U	530 U	540 U	5800 c
1,3,5-TRINITROBENZENE	130 U	1100 U	1100 U	1100 U	1100 U	1100 U	3900 n
1,3-DINITROBENZENE	120 U	520 U	540 U	540 U	530 U	540 U	7800 n
NITROBENZENE	200 U	1100 U	1100 U	1100 U	1100 U	1100 U	39000 n
TETRYL	1000	520 U	540 U	540 U	530 U	540 U	NA
2,4,6-TNT	120 U	1100 U	1100 U	1100 U	1100 U	1100 U	21000 c
2,4-DNT/2,6-DNT	190 U	520 U	540 U	540 U	530 U	540 U	160000/78000 n
AMINO-DNTs	190 U	1100 U	1100 U	1100 U	1100 U	1100 U	NA
2-NITROTOLUENE	490 U	520 U	540 U	540 U	530 U	540 U	78000 n
4-NITROTOLUENE	1500 U	1100 U	78000 n				
3-NITROTOLUENE	490 U	520 U	540 U	540 U	530 U	540 U	78000 n

NOTES: ug/Kg - micrograms per kilogram
c - carcinogenic
n - noncarcinogenic
NA - not applicable
RBC - Risk Based Concentration
U - not detected

TABLE 4
AREA OF CONCERN NUMBER 17
INORGANIC ANALYTICAL RESULTS FOR SURFACE WATER

AREA OF CONCERN	17		
Sample ID Units	AOC17SW01 ug/L	AOC17SW02 ug/L	Freshwater Chronic AWQC
Aluminum	720	610	*
Antimony	60 U	60 U	30 (p)
Arsenic	10 U	10 U	—
Barium	200 U	200 U	—
Beryllium	5 U	5 U	5.3
Cadmium	5 U	5 U	1.1+
Calcium	41000	52000	—
Chromium	10 U	10 U	11.0
Cobalt	50 U	50 U	—
Copper	25 U	25 U	12
Iron	9900	10000	—
Lead	3 U	3 U	3.2
Magnesium	13000	14000	—
Manganese(1)	810	900	1500**
Mercury	0.2 U	0.2 U	0.012
Nickel	40 U	40 U	160
Potassium	9300	9700	—
Selenium	5 U	5 U	5.0
Silver	10 U	10 U	0.12
Sodium	67000	44000	—
Thallium	10 U	10 U	40
Vanadium	50 U	50 U	—
Zinc	72	83	110
Tot. CN	10 U	10 U	5.2

NOTES: ug/L - microgram per liter
 (1) Manganese exceeds AWQC
 AWQC - Ambient Water Quality Criteria
 U - not detected
 * - pH dependent
 (p) - proposed
 + - hardness dependent
 ** - 1986 threshold limit for freshwater

TABLE 5
AREA OF CONCERN NUMBER 20
NITRAMINE/NITROAROMATIC RESULTS FOR SURFACE WATER

AREA OF CONCERN	20
Sample I.D. Units	AOC20SW01 ug/L.
HMX	2.4 U
RDX	1.2 U
1,3,5-TRINITROBENZENE	0.28 U
1,3-DINITROBENZENE	0.26 U
NITROBENZENE	0.46 U
TETRYL	0.83 U
2,4,6-TNT	0.27 U
2,4-DNT/2,6-DNT	0.44 U
AMINO-DNTs	0.44 U
2-NITROTOLUENE	1.1 U
4-NITROTOLUENE	3.3 U
3-NITROTOLUENE	1.1 U

NOTES: ug/L - micrograms per liter
 U - not detected