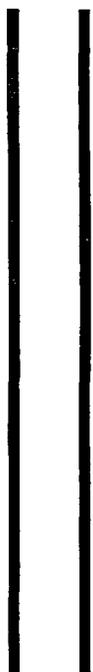
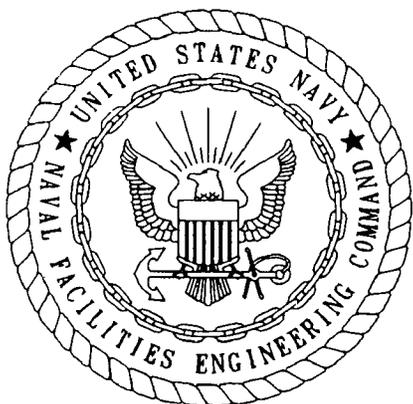


N00213.AR.001174
NAS KEY WEST
5090.3a

MONITORING ONLY PLAN BASE EXCHANGE SERVICE STATION BUILDING A 322 NAS
KEY WEST FL
1/1/1994
ABB ENVIRONMENTAL SERVICES INC

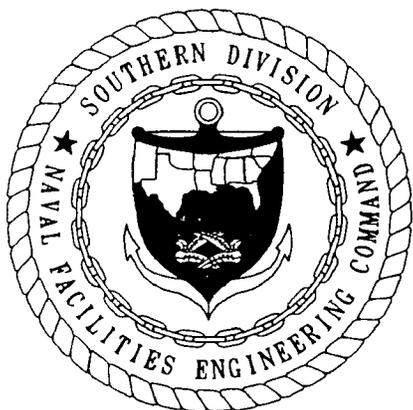


**MONITORING ONLY PLAN
BASE EXCHANGE SERVICE STATION
BUILDING A-322
BOCA CHICA FIELD**

**NAVAL AIR STATION KEY WEST
KEY WEST, FLORIDA**

**NAVY CLEAN - DISTRICT I
CONTRACT NO. N62467-89-D-0317**

JANUARY 1994



**SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
NORTH CHARLESTON, SOUTH CAROLINA
29419-9010**

MONITORING ONLY PLAN

**BASE EXCHANGE SERVICE STATION
BUILDING A-322
BOCA CHICA FIELD
NAVAL AIR STATION KEY WEST
KEY WEST, FLORIDA**

Unit Identification Code (UIC): NOO213

Contract No. N62467-89-D-0317

Prepared by:

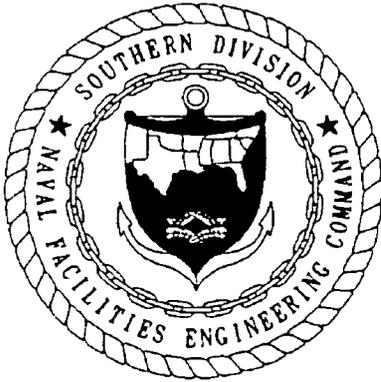
**ABB Environmental Services, Inc.
2590 Executive Center Circle, East
Tallahassee, Florida 32301**

Prepared for:

**Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
North Charleston, South Carolina 29418**

Gabriel Magwood, Code 1849, Engineer-in-Charge

January 1994



FOREWORD

Subtitle I of the Hazardous and Solid Waste Amendments (HSWA) of 1984 to the Solid Waste Disposal Act (SWDA) of 1965 established a national regulatory program for managing underground storage tanks (USTs) containing hazardous materials, especially petroleum products. Hazardous wastes stored in USTs were already regulated under the Resource Conservation and Recovery Act (RCRA) of 1976, which was also an amendment to SWDA. Subtitle I requires that the U.S. Environmental Protection Agency (USEPA) promulgate UST regulations. The program was designed to be administered by the individual States, who were allowed to develop more stringent standards, but not less stringent standards. Local governments were permitted to establish regulatory programs and standards that are more stringent, but not less stringent than either State or Federal regulations. The USEPA UST regulations are found in the Code of Federal Regulations, Title 40, Part 280 (40 CFR 280) (*Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks*) and Title 40 CFR 281 (*Approval of State Underground Storage Tank Programs*). Title 40 CFR 280 was revised and published on September 23, 1988, and became effective December 22, 1988.

The Navy's UST program policy is to comply with all Federal, State, and local regulations pertaining to USTs. This plan was prepared to satisfy the requirements of Chapter 17-770, Florida Administrative Code (FAC) (*State Underground Petroleum Environmental Response*) regulations on petroleum contamination in Florida's environment as a result of spills or leaking tanks or piping.

Questions regarding this report should be addressed to the Environmental Coordinator, Naval Air Station, Key West, Florida, at 305-293-2194, or to Southern Division, Naval Facilities Engineering Command (SOUTHNAVFACENGCOM), Gabriel Magwood, Code 1849, at AUTOVON 5630658 or (803)743-0658.

ACKNOWLEDGMENTS

In preparing this plan, the Underground Storage Tank Section of the Comprehensive Long-Term Environmental Action, Navy group at ABB Environmental Services, Inc., commends the support, assistance, and cooperation provided by the personnel of the Naval Air Station (NAS) Key West, Key West, Florida, and Southern Division, Naval Facilities Engineering Command (SOUTHNAVFACENGCOM).

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Building A-322, Boca Chica Field
Naval Air Station, Key West, Florida

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Building A-322, Boca Chica Field
Naval Air Station, Key West, Florida

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GLOSSARY

ABB-ES	ABB Environmental Services, Inc.
bls	below land surface
CAR	Contamination Assessment Report
CFR	Code of Federal Regulations
FAC	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
FDER	Florida Department of Environmental Regulations
HSWA	Hazardous and Solid Waste Amendments
MOP	Monitoring Only Plan
MTBE	methyl tert-butyl ether
NAS	Naval Air Station
ppb	parts per billion
ppm	parts per million
QAP	Quality Assurance Plan
RCRA	Resource Conservation and Recovery Act of 1976
SOUTHNAV- FACENCOM	Southern Division, Naval Facilities Engineering Command
SWDA	Solid Waste Disposal Act of 1965
TRPH	total recoverable petroleum hydrocarbons
UIC	uniform identification code
USEPA	U.S. Environmental Protection Agency
UST	underground storage tank

1.0 INTRODUCTION

The Naval Air Station (NAS) Key West is located approximately 150 miles southwest of Miami in Monroe County, Florida (Figure 1-1). NAS Key West, a complex of activities located in numerous areas of the Lower Florida Keys, encompasses approximately 5,000 acres. The majority of these activities are concentrated on Boca Chica Key and Key West. The mission of NAS Key West is to maintain and operate facilities and provide services and materials to support operations of aviation activities and units designated by the Chief of Naval Operations.

ABB Environmental Services, Inc. (ABB-ES), was contracted by Southern Division, Naval Facilities Engineering Command (SOUTHNAVFACENGCOCOM) to prepare a Monitoring Only Plan (MOP) for conducting quarterly sampling of selected monitoring wells at the Base Exchange Service Station, Building A-322, at Boca Chica Field, NAS Key West. The scope and manner for implementing the MOP are presented herein.

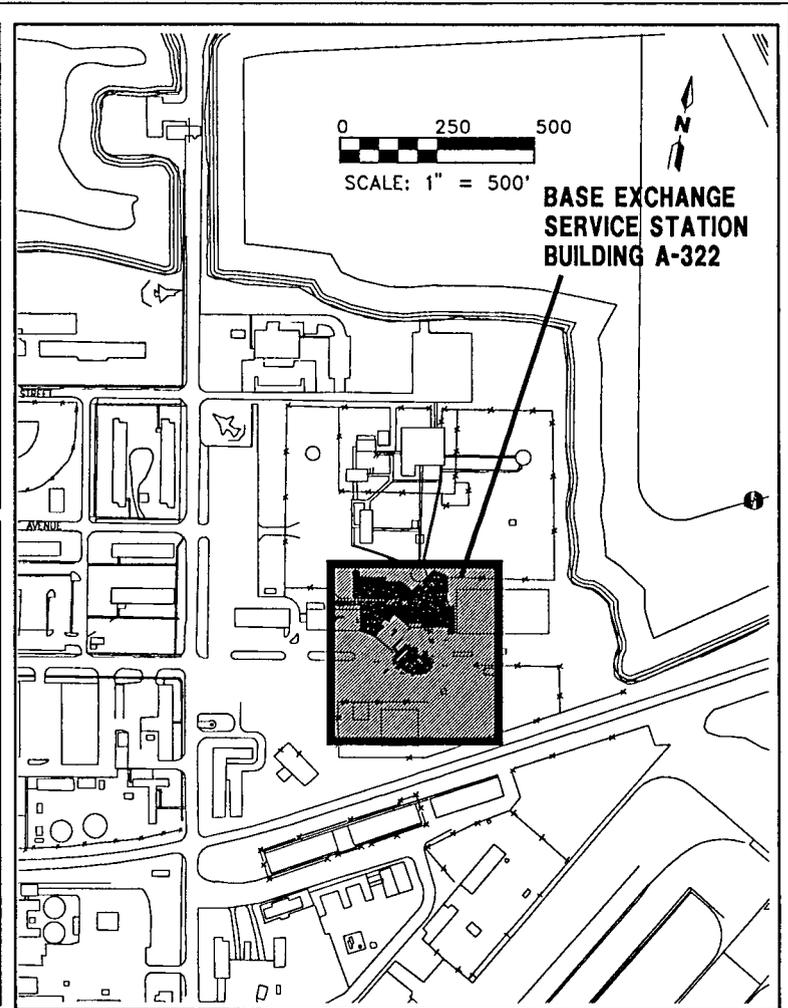
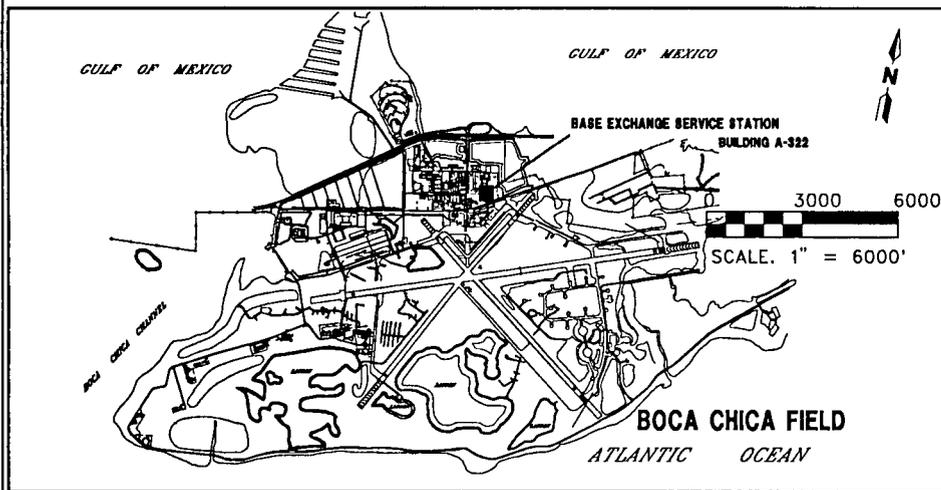
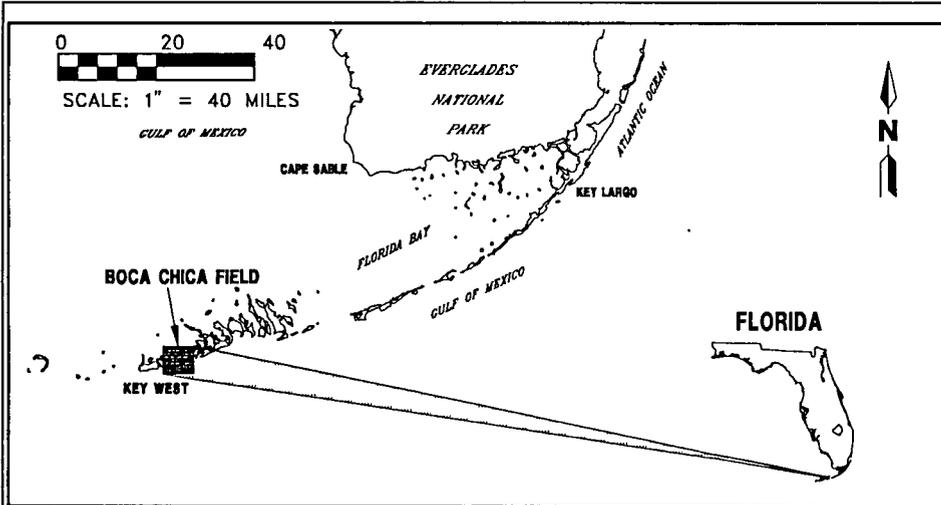


FIGURE 1-1
FACILITY LOCATION MAP



MONITORING ONLY PLAN
BUILDING A-322

BOCA CHICA FIELD
NAVAL AIR STATION KEY WEST
KEY WEST, FLORIDA

2.0 SITE BACKGROUND

2.1 SITE DESCRIPTION AND HISTORY. The Base Exchange Service Station (Building A-322) is located on Boca Chica Field, NAS Key West, at the east end of Langley Avenue (Figure 1-1). The Base Exchange Service Station has been in operation since 1961. The site is the location of three underground storage tanks (USTs) and associated piping used to dispense unleaded and leaded gasoline. The volumes of two USTs are 5,900 gallons; the volume of the third UST is 9,400 gallons. The USTs and the dispensing system were installed in 1974 on the southeast side of Building A-322 (Figure 2-1). Precision tank testing, which was conducted in 1989, revealed that the dispensing system was leaking. A preliminary site visit revealed a 500-gallon, underground waste oil tank located on the northwest side of Building A-322. The age and length of service of the waste oil UST is not known. All USTs were emptied and taken out of service in 1990. The waste oil UST is scheduled to be removed from the site

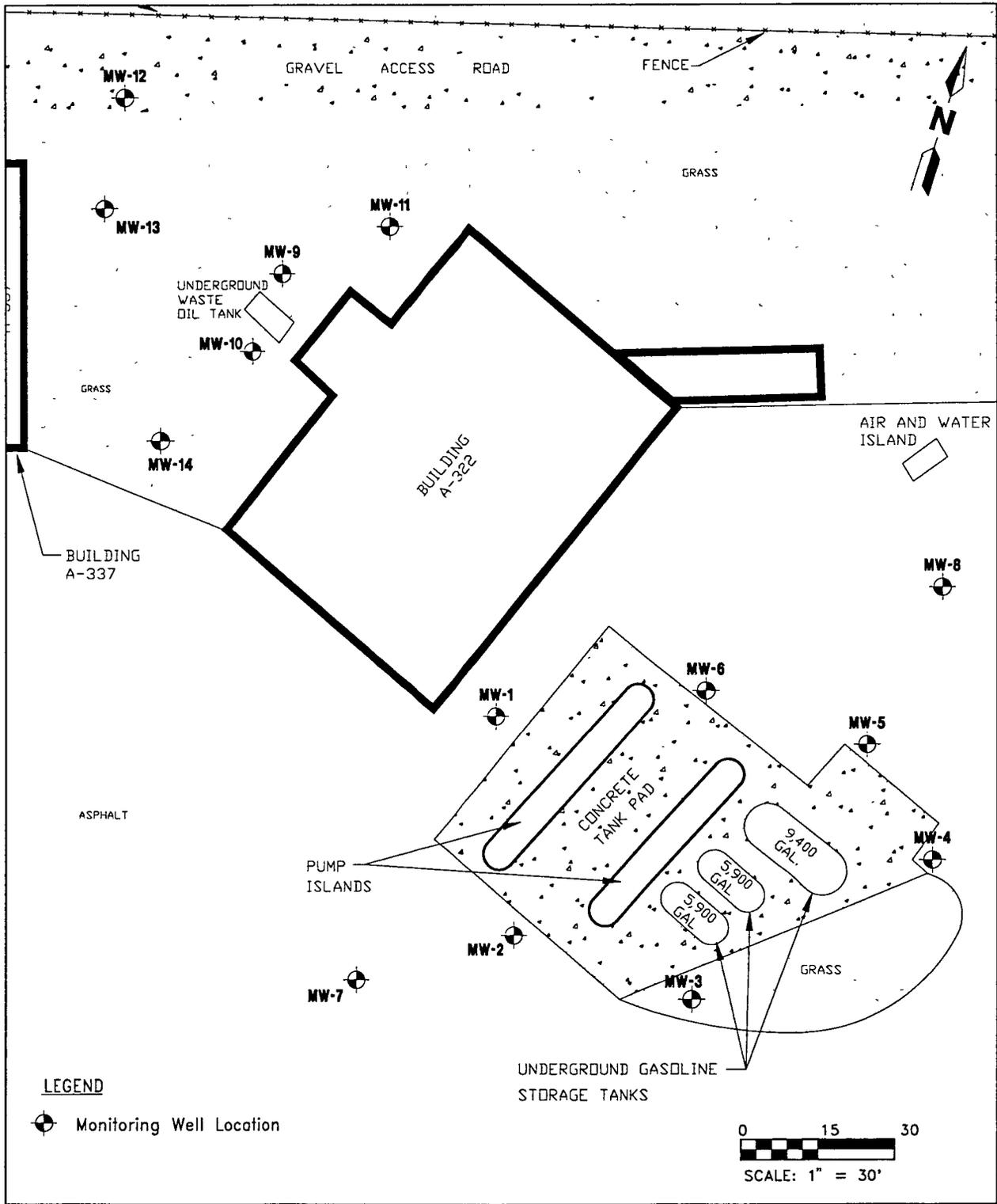
2.2 PREVIOUS INVESTIGATIONS. During the initial site investigation, conducted in July and August 1991, eight monitoring wells (MW-1 through MW-8) were installed in the vicinity of the gasoline USTs. Four monitoring wells (MW-9 through MW-12) were installed in the vicinity of the waste oil tank. Monitoring well locations are shown in Figure 2-1. Monitoring wells were installed to depths of approximately 13 feet below land surface (bls) and were constructed of 2-inch inside diameter, Schedule 40, polyvinyl chloride casing and 10 feet of 0.010-inch slotted well screen.

Groundwater samples were collected from monitoring wells MW-1 through MW-8, located in the vicinity of the gasoline USTs, and were analyzed for constituents of the gasoline analytical group as defined in Chapter 17-770, Florida Administrative Code (FAC). Samples collected from monitoring wells MW-9 through MW-12, located in the vicinity of the waste oil UST, were analyzed for constituents of the used oil group as defined in Chapter 17-770, FAC.

A Contamination Assessment Report (CAR) prepared by ABB-ES was submitted to the Florida Department of Environmental Regulation (FDER), currently known as the Florida Department of Environmental Protection (FDEP), in February 1992 (ABB-ES, 1992). Upon completion of the CAR review in March 1992, and discussions between FDEP and ABB-ES during a meeting held on April 17, 1992, it was agreed that a supplemental assessment would be conducted to investigate contamination in the vicinity of the waste oil UST. The supplemental assessment was conducted in March and June 1993.

Supplemental assessment activities included the following:

- installation of groundwater monitoring wells MW-13 and MW-14;
- sampling of monitoring wells MW-9, MW-10, and MW-12 through MW-14 for analyses of constituents of the used oil group and sulfur; and
- preparation of a CAR addendum.



**FIGURE 2-1
SITE PLAN SHOWING
MONITORING WELL LOCATIONS**



**MONITORING ONLY PLAN
BUILDING A-322**

**BOCA CHICA FIELD
NAVAL AIR STATION KEY WEST
KEY WEST, FLORIDA**

A CAR addendum (ABB-ES, 1993) was submitted to FDEP in September 1993. After review of the CAR addendum, FDEP, in a letter dated November 22, 1993, recommended that monitoring wells MW-9, MW-10, MW-11, and MW-14, be sampled quarterly for a period of 1 year and analyzed for total recoverable petroleum hydrocarbons (TRPH). A copy of the Monitoring Only Approval Order is attached in Appendix A, FDEP Correspondence.

3.0 SITE CONDITIONS

The following is a summary of pertinent conditions in the vicinity of the waste oil UST encountered during the supplemental investigation conducted in March and June 1993. Site conditions are described in more detail in the CAR (ABB-ES, 1992) and the CAR addendum (ABB-ES, 1993).

- Groundwater was encountered at depths of 2 to 5 feet bls in monitoring wells MW-9 through MW-13. Groundwater contamination concentrations were compared to Class G-III groundwater standards (ABB-ES, 1992).
- Groundwater flow direction in the vicinity of the waste oil UST varies from westerly to southerly. Water table elevation contour maps for March 27, 1993, and June 7, 1993, are presented in Figures 3-1 and 3-2, respectively. Tidal fluctuations appear to cause slight changes in the groundwater flow direction (ABB-ES, 1992).
- Groundwater laboratory analytical data from samples collected from monitoring wells MW-9, MW-10, and MW-12 through MW-14 during the supplemental assessment, conducted in March and June 1993, are summarized in Table 3-1. (Note: monitoring well MW-11 was not sampled because no contaminants were detected in samples from this well in the August 1991 sampling event.)
- Contaminants identified in groundwater samples were TRPH, methyl tert-butyl ether (MTBE), acetone, carbon disulfide, and sulfur. The compounds 1,2,4,5,7,8-hexathionane, hexathiepane, and 1,2,4-trithiolane were tentatively identified at concentrations from 12 parts per billion (ppb) to 74 ppb. Two unidentified compounds were also detected in the sample collected from monitoring well MW-9.
- TRPH were the only contaminants detected in groundwater samples exceeding State target levels or recommended guidance concentrations. TRPH concentrations detected in groundwater samples collected from monitoring wells MW-9 and MW-10 were 11 parts per million (ppm) and 3 ppm, respectively. The State target level for TRPH is 5 ppm for Class G-III groundwater.
- Comparison of groundwater analytical data collected in August 1991 and March and June 1993 indicate that TRPH contamination in the groundwater is persistent (ABB-ES, 1993). The areal extent of TRPH groundwater contamination exceeding 5 ppm appears to be restricted to a small area (approximately 15-foot radius) surrounding the waste oil UST (Figure 3-3).
- No free product was detected in monitoring wells near the waste oil UST.

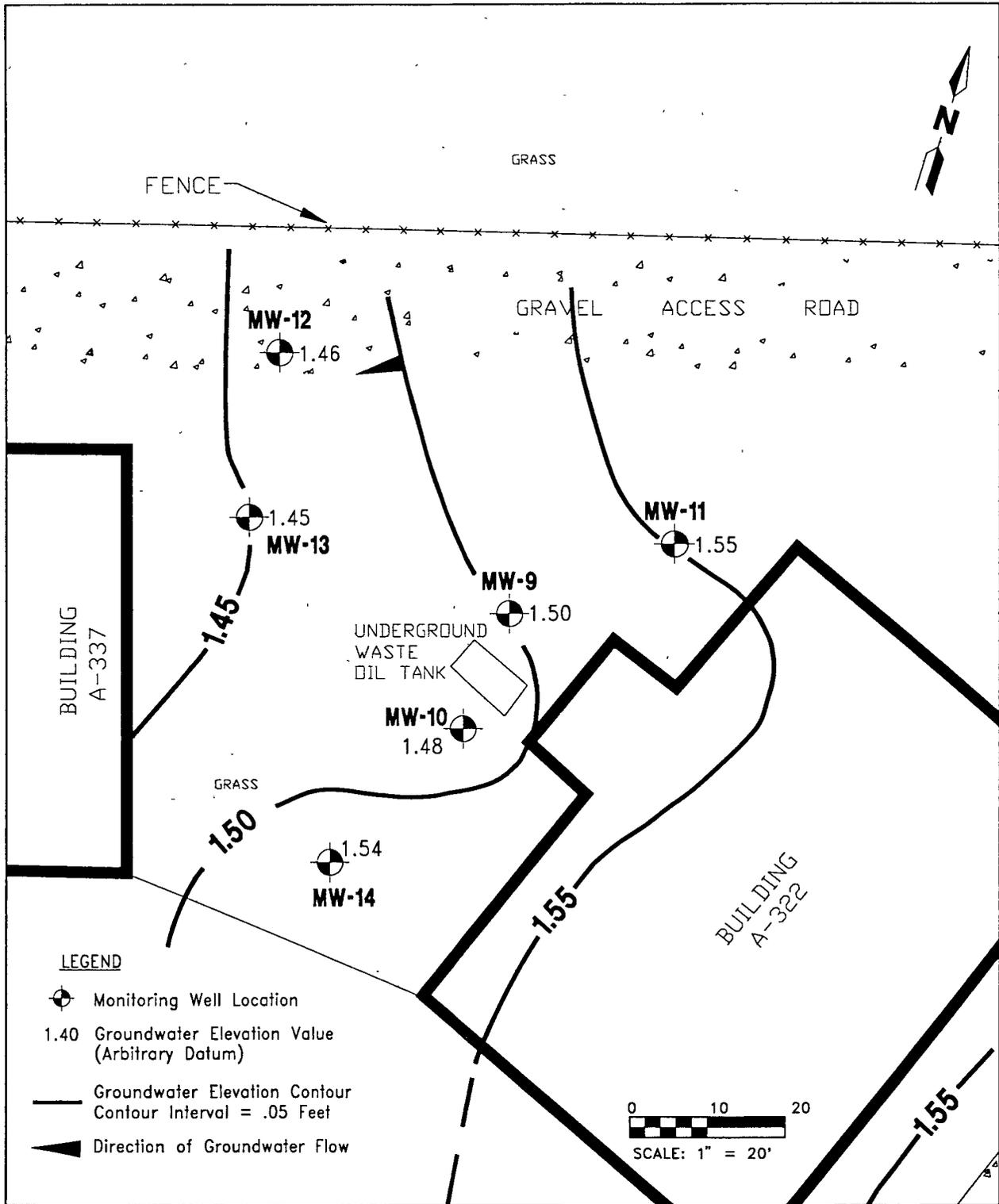


FIGURE 3-1
WATER TABLE ELEVATION CONTOUR MAP,
SURFICIAL AQUIFER, MARCH 27, 1993



MONITORING ONLY PLAN
BUILDING A-322

BOCA CHICA FIELD
NAVAL AIR STATION KEY WEST
KEY WEST, FLORIDA

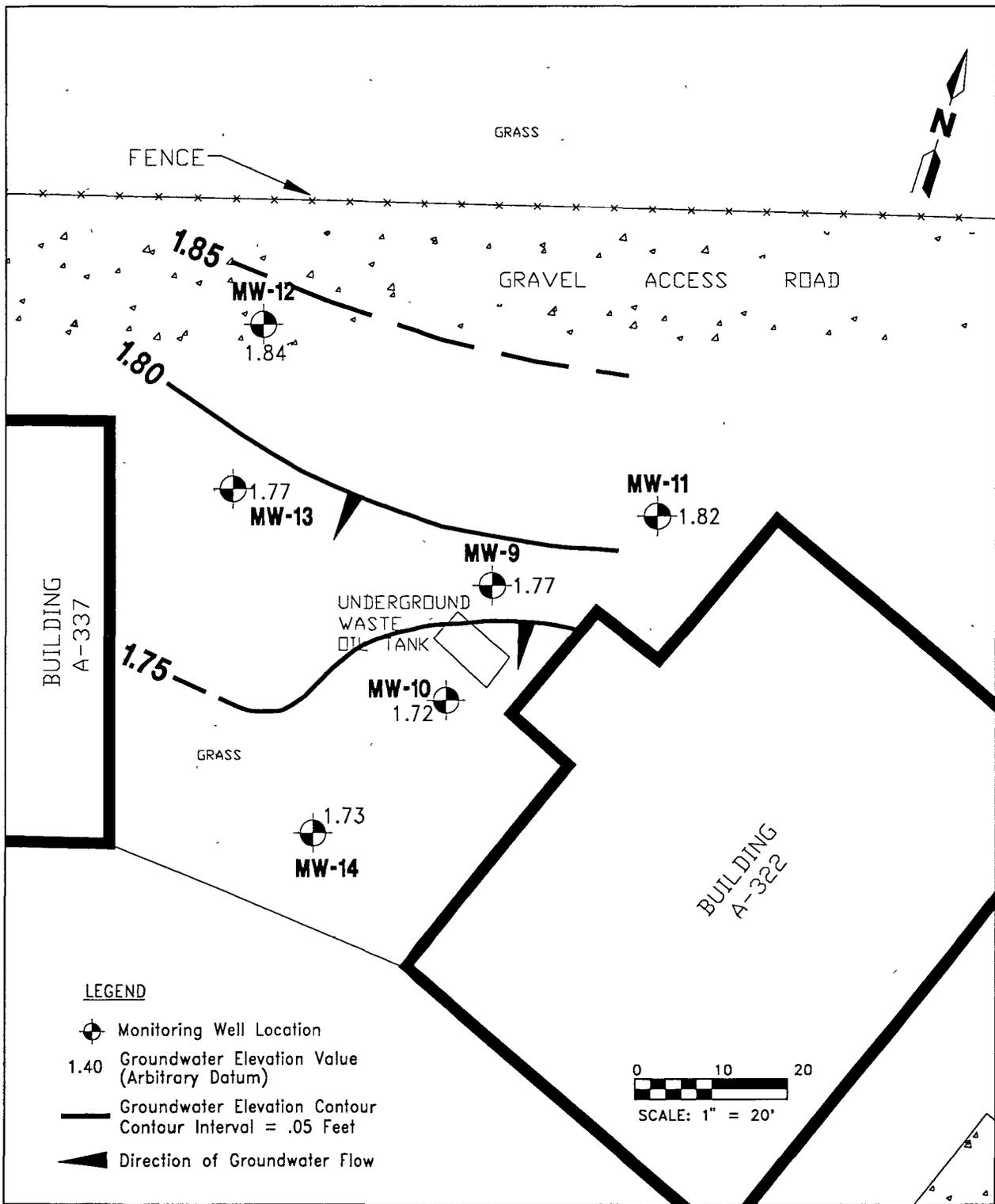


FIGURE 3-2
WATER TABLE ELEVATION CONTOUR MAP,
SURFICIAL AQUIFER, JUNE 7, 1993



MONITORING ONLY PLAN
BUILDING A-322

BOCA CHICA FIELD
NAVAL AIR STATION KEY WEST
KEY WEST, FLORIDA

**Table 3-1
Summary of Groundwater Sample Laboratory Analyses,
March 27 and June 7, 1993**

Monitoring Only Plan
Building A-322, Boca Chica Field
Key West, Florida

Compound	State Target Level or Recommended Guidance Concentration	MW-9	MW-10	MW-12	MW-13	MW-14	DUP ¹	EB
MTBE	50 ²	3	20	ND	ND	14	ND	ND
Acetone	700 ³	ND	ND	ND	100	310	ND	ND
Sulfur		76	120	36	41	130	ND	ND
Lead	15	ND	ND	ND	ND	ND	NA	21
TRPH	5 ²	11	3	ND	ND	ND	ND	ND
1,2,4,5,7,8-Hexathionane ⁴		74	ND	ND	ND	ND	ND	ND
Hexathiepane ⁴		16	ND	ND	ND	18	ND	ND
1,2,4-Trithiolane ⁴		ND	31	ND	ND	12	ND	ND
Unknowns		26	ND	ND	ND	ND	ND	ND
Total TICs		116	31	ND	ND	30	ND	ND

¹Duplicate sample taken from MW-12

²State target level, Chapter 17-770, Florida Administrative Code.

³Recommended guidance concentration, Florida Department of Environmental Regulation, February 1989.

⁴Tentatively identified compound

Notes: All concentrations are in parts per billion except for TRPH, which is in parts per million.

EB = equipment blank.

MTBE = methyl tert-butyl ether.

ND = not detected.

NA = not analyzed (see text for explanation).

TRPH = total recoverable petroleum hydrocarbons.

TIC = tentatively identified compound

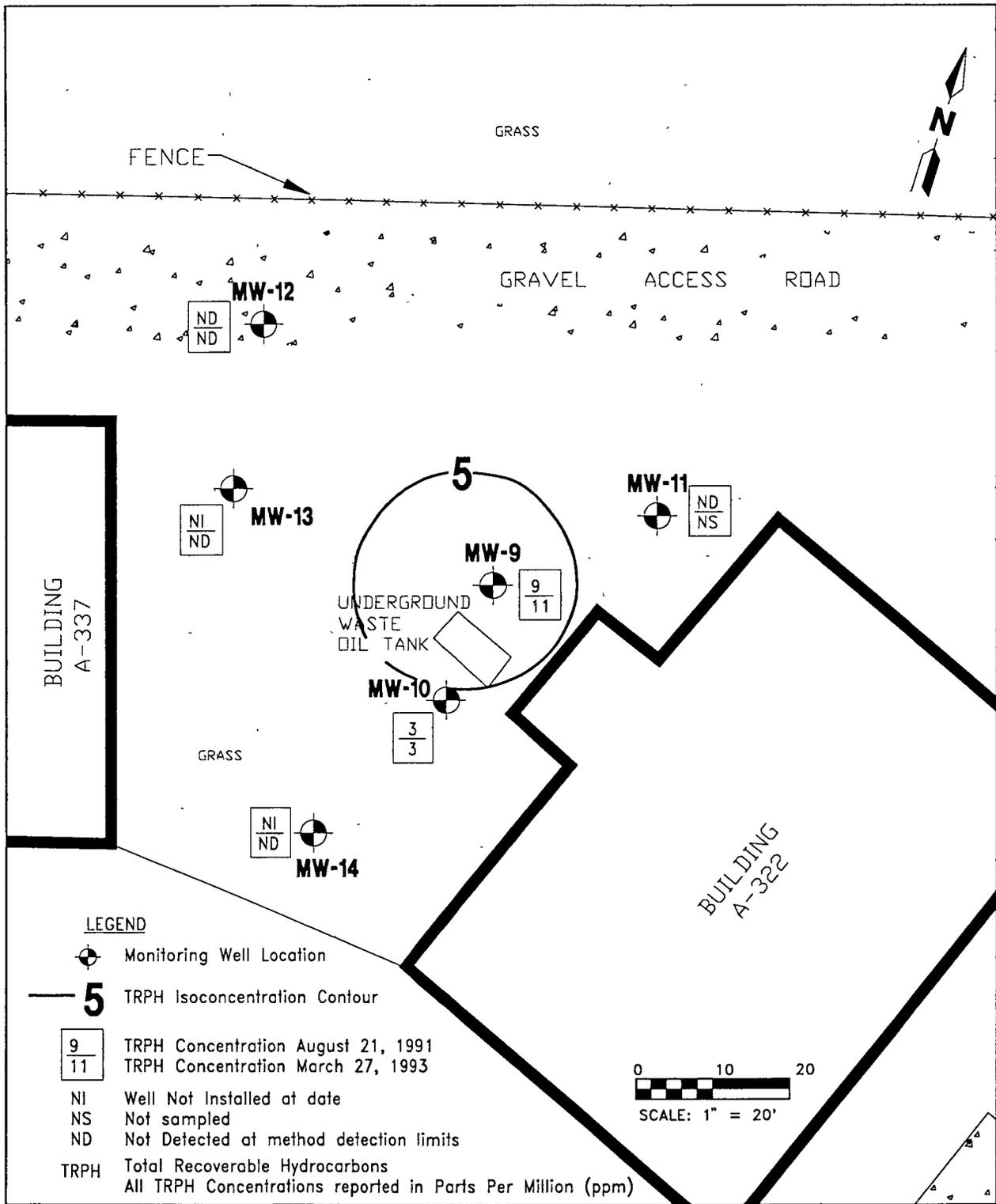


FIGURE 3-3
TOTAL RECOVERABLE PETROLEUM
HYDROCARBON (TRPH),
GROUNDWATER CONTAMINATION DISTRIBUTION MAP,
AUGUST 21, 1991, AND MARCH 27, 1993



MONITORING ONLY PLAN
BUILDING A-322

BOCA CHICA FIELD
NAVAL AIR STATION KEY WEST
KEY WEST, FLORIDA

4.0 IMPLEMENTATION OF MONITORING ONLY PLAN (MOP)

The MOP will require the following actions.

- Quarterly groundwater sampling of monitoring wells MW-9, MW-10, MW-11, and MW-14 will be conducted for a period of 1 year. Groundwater samples will be collected in accordance with an FDEP-approved Quality Assurance Plan (QAP). Samples will be shipped to an FDEP-approved analytical laboratory. All groundwater samples collected will be analyzed by U.S. Environmental Protection Agency (USEPA) Method 418.1.
- Depth to groundwater from the top of the casing will be measured in monitoring wells MW-9 through MW-14. Depth to groundwater will be measured using an electric water-level indicator and an engineering tape with divisions in increments of 0.01 foot. Groundwater level elevations will be calculated by subtracting the measured depth to groundwater from the elevation at the top of the well casing. Top of casing measurements will be referenced to those presented in the CAR Addendum (ABB-ES, 1993). A groundwater flow direction map will be prepared using groundwater elevation data.
- Quarterly analytical results will be submitted in a written report to FDEP within 60 days of sample collection. In addition, three written reports will be submitted to SOUTHNAVFACENGCOCM and two written reports will be submitted to the Public Works Department at NAS Key West. Each quarterly report will include:
 - (1) a brief review of site background information and site conditions;
 - (2) a site location map showing the locations of monitoring wells MW-9 through MW-14;
 - (3) a groundwater contamination map illustrating laboratory analytical results;
 - (4) a table showing top of casing elevations, depth to groundwater, and groundwater elevations for monitoring wells MW-9 through MW-14; and
 - (5) a groundwater flow direction map using groundwater elevations from monitoring wells MW-9 through MW-14.
- The final quarterly report will include a summary of the results of the year's groundwater sampling analyses.

If TRPH concentrations increase above 50 ppm in monitoring well MW-9 (source well) and 5 ppm in monitoring wells MW-10, MW-11, or MW-14 during the monitoring period, then the resampling and supplemental assessment described in Chapter 17-770.660(6), FAC, should be performed (see Appendix A, FDEP Correspondence). If TRPH concentrations are not below the State target level of 5 ppm at the end of the monitoring period, then additional monitoring, supplemental assessment, and/or remediation may be required.

REFERENCES

ABB Environmental Services, Inc., 1992, Contamination Assessment Report, Base Exchange Service Station, Building A-322, Boca Chica Field, Naval Air Station Key West: prepared for Southern Division, Naval Facilities Engineering Command.

ABB Environmental Services, Inc., 1993, Contamination Assessment Report Addendum, Base Exchange Service Station, Building A-322, Boca Chica Field, Naval Air Station Key West: prepared for Southern Division, Naval Facilities Engineering Command.

APPENDIX A

**FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION (FDEP) CORRESPONDENCE**

Florida Department of
Environmental Protection



Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2600

Virginia B. Wetherell
Secretary

November 23, 1993

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Luis Vazquez
Department of The Navy
Naval Facilities Engineering Command
P O Box 10068
2155 Eagle Drive
Charleston, South Carolina 29411-0068

Dear Mr. Vazquez:

Department personnel have completed the technical review of the Base Exchange Service Station, Building A-322 Boca Chica Field, Contamination Assessment Report, NAS Key West. Based upon staff review and comments, the enclosed Approval Order for the "monitoring only" proposal was signed by Mr. John M. Ruddell, Director of the Division of Waste Management. The necessary requirements to comply with Chapter 17-770, Florida Administrative Code are provided in the attached Order.

If I can be of any further assistance with this matter, please contact me at (904) 488-0190.

Sincerely,

Eric S. Nuzie
Federal Facilities Coordinator

ESN/sr

Enclosure

cc: Jorge Caspary
Mike Good
John Mitchell
Rose Ann Rudd



Lawton Chiles
Governor

Florida Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia H. Westwood
Secretary

November 22, 1993

Mr. Luis Vasquez
Code 1843
Southern Division
Naval Facilities Engineering Command
P.O. Box 10068
2155 Eagle Drive
North Charleston, SC 29419-9010

RE: Base Exchange Service Station, Building A-322
Boca Chica Field, Naval Air Station Key West,
Key West, Florida

Dear Mr. Vasquez:

The Bureau of Waste Cleanup has reviewed the Contamination Assessment Report (CAR) Addendum and Monitoring Only Plan (MOP) dated September, 1993 (received September 27, 1993), submitted for this site. Pursuant to Rule 17-770.630(4), Florida Administrative Code (F.A.C.), the Department approves the "monitoring only" proposal. Pursuant to Rules 17-770.660 and 17-770.700(3), F.A.C., you are required to complete the monitoring program outlined below, and to submit the analytical results to the Department within sixty (60) days of sample collection:

<u>Monitoring Wells</u>	<u>Parameters</u>	<u>Frequency</u>	<u>Duration</u>
MW-9, MW-10, MW-11, and MW-14	EPA Method 418.1, .	Quarterly	One Year

If contaminant concentrations in the designated wells increase above the concentrations listed below, then the resampling/supplemental assessment described in Rule 17-770.660(6) should be performed. If the contaminant concentrations do not decrease below Rule 17-770.730(5) target cleanup levels after the duration of the monitoring period, then additional monitoring, supplemental contamination assessment and/or remediation may be required:

FAX
12/03/93

12:26

TEL: 9042645632
743 0893

Dec 03 93
SPECIAL PROG OPC -2L ABB

11:26 No.003 P.05
008/008

Mr. Luis Vasquez
November 22, 1993
Page Two

MW-9: 50 ug/l TRPH

MW-10, MW-11, and MW-14: 5 ug/l TRPH

Persons whose substantial interests are affected by this Approval Order have the right to challenge the Department's decision. Such a challenge may include filing a petition for an administrative determination (hearing) as described in the following paragraphs. However, pursuant to Chapter 17-103, F.A.C., you may request an extension of time to file the Petition. All requests for extensions of time or petitions for administrative determinations must be filed directly with the Department's Office of General Counsel at the address given below within twenty-one (21) days of receipt of this notice (do not send them to the Bureau of Waste Cleanup).

Notwithstanding the above, a person whose substantial interests are affected by this Approval Order may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within twenty-one (21) days of receipt of this notice. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the Department file number (DER facility number), and the name and address of the facility;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by each petitioner, if any;
- (e) A statement of facts which each petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes each petitioner contends require reversal or modification of the Department's action or proposed action; and

RX

12:26

TEL:9042645632
889 743 0863

SPECIAL PROG OPC
Dec 03 93
3C ABB

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000/000

Mr. Luis Vasquez
November 22, 1993
Page Three

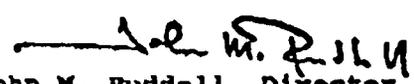
- (g) A statement of the relief sought by each petitioner, stating precisely the action each petitioner wants the Department to take with respect to the Department's action or proposed action.

This Approval Order is final and effective on the date of receipt of this Order unless a petition (or time extension) is filed in accordance with the preceding paragraphs. Upon the timely filing of a petition, this Order will not be effective until further order of the Department.

When the Order is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, F.S., by filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal, accompanied by the applicable filing fees, with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty (30) days from the date the Final Order is filed with the Clerk of the Department.

Any questions you may have on the technical aspects of this Approval Order should be directed to Michael J. Deliz (904) 488-0190. Contact with the above named person does not constitute a petition for administrative determination.

Sincerely,



John M. Ruddell, Director
Division of Waste Management

JMR/mjd

cc: Mike Good, DEP South District Office



13 December 1993

Mr. Mike Deliz
Florida Department of Environmental Protection
2600 Blairstone Road
Tallahassee, Florida 32301

**Re: Monitoring Only Approval Order
Base Exchange Service Station (Building A-322)
Boca Chica Field, Naval Air Station,
Key West, Florida**

Dear Mike:

Based on our telephone conversation earlier today, it is my understanding that the semiannual groundwater monitoring plan requested for Site A-322 will be replaced with a quarterly sampling plan, as outlined in the monitoring only Approval Order, dated November 22, 1993. Also, the TRPH concentrations listed on Page Two of the Approval Order should be changed from micrograms per liter (ug/l) to milligrams per liter (mg/l).

Very truly yours,

ABB Environmental Services, Inc.

Roger Durham
Senior Scientist

cc: Luis Vazquez
Jim Williams
Jack Pittman
Project File

ABB Environmental Services Inc.