

July 14, 2010
Project 993600-2-2001

Geotechnical
Environmental
Water Resources
Ecological

Mr. Leonardo Ceron
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 4
11th Floor/Superfund
61 Forsyth Street, SW
Atlanta, GA 30303

Re: Removal Action Work Plan Investigations
Summary Letter
Huntsville Gas Company Site
Huntsville, Madison County, Alabama
USEPA ID# ALN000407462
Docket Number 04-2010-3756

Dear Mr. Ceron:

On behalf of the Alabama Gas Corporation (ALAGASCO) and the Huntsville Housing Authority (HHA), GEI Consultants, Inc. (GEI) has prepared this letter to summarize investigations completed at the Huntsville former Manufactured Gas Plant (MGP), herein referenced as the "Site". The investigations were completed in accordance with the Removal Action Work Plan (RAWP) dated March 30, 2010, approved by the U.S. Environmental Protection Agency (EPA), Region 4 on April 22, 2010.

GEI summarized the completed tasks in the Monthly Status Report dated June 15, 2010. The completed tasks were:

- Electromagnetic (EM) and Ground Penetrating Radar (GPR) mapping for the old foundation elements and utilities at the Site;
- Collection of 5 sediment samples in the unnamed ditch;
- Collection of 3 sediment samples in Pinhook Creek;
- Installation and sampling of 4 temporary well points per the RAWP scope and an additional 3 piezometers to aid in groundwater flow characterization;
- Collection of 34 surface soil samples from 0-1.0 feet;
- Collection of 34 shallow subsurface soil samples from 1.0-4.0 feet;
- Collection and selected analysis of 8 subsurface soil samples from soils below 4 feet;
- Collection of 4 groundwater samples; and
- Partial excavation of 5 test pits identified through soil borings and geophysical survey.

This letter discusses the field observations made during the investigations and summarizes the preliminary laboratory analytical data for surface soil, shallow subsurface soil, subsurface soil, sediment, and groundwater. Based on the field observations and laboratory analytical results, GEI has developed a scope for additional investigations to complete the characterization of the Site for remediation. A revised project schedule is proposed for completion of the additional characterization and remediation.

1.0 Surface Soil and Shallow Subsurface Soil Investigation

Between May 11 and May 18, 2010, GEI completed a total of 40 soil borings across the Site. The approximate locations of the soil borings are presented in Figure 1 – Sample Locations Plan. GEI located the soil borings per Figure 5 of the RAWP with minor variations as necessary to avoid utilities and surface features. Two (2) additional soil boring locations HG-RES-28-2 and HG-RES-19-1 were added at the request of the On Scene Coordinator (OSC) to delineate impacts identified visually in the field in TWP-1 and HG-RES-15-1.

The soil borings were completed to delineate soil impacts identified during previous investigations of the surface soil (i.e., 0.0 to 1.0 feet) and shallow subsurface soil (i.e., 1.0 to 4.0 feet). GEI advanced the soil borings using either hand augers or by direct-push drilling methods. Direct-push drilling was completed by Technical Drilling Services, Inc., of Knoxville, Alabama, a licensed driller in Alabama. Table 1 – Soil Boring and Sample Summary lists each soil boring completed at the Site.

Two samples were collected from each soil boring proposed for delineation of surface soil and shallow subsurface soil; one (1) sample was collected from the 0.0 to 1.0 foot interval below ground surface (bgs) and one (1) sample was collected from the 1.0 to 4.0 foot interval. Soil borings HG-RES-41, HG-RES-42, and HG-RES-43 were completed to a depth of approximately 0.5 feet bgs. A total of 34 surface soil and 34 shallow subsurface soil samples were collected from the soil borings. The soil samples were analyzed per the RAWP for Benzene, Toluene, Ethylbenzene and Xylenes (BTEX) using EPA Method 8260B, Polynuclear Aromatic Hydrocarbons (PAHs) using EPA Method 8270C with Selected Ion Monitoring (SIM), and metals, including arsenic, lead, and mercury using EPA Method 6010/7470A.

The samples were analyzed by Analytical Environmental Services, Inc., of Atlanta, Georgia. Laboratory analytical results for the surface soil and shallow subsurface soil samples are presented in Table 2 (attached). Table 2 compares the results of the soil analysis to the Proposed Removal Goals (PRGs) developed for the Site. The PRGs were developed using exposure scenarios for both Residential Soil and Construction/Utility Soil. PRGs were developed based on a target Cancer Risk Level (CRL) of 1×10^{-4} for carcinogenic compounds. With the exception of arsenic, PRGs were conservatively developed based on a Hazard Quotient (HQ) of 1.0 for non-carcinogenic compounds. For non-carcinogenic risk associated with arsenic, the PRG was developed based on an HQ of 3.0 in accordance with USEPA Region 4 guidance presented in memoranda dated August 20, 2008 and September 19, 2008 regarding the review of the Removal Site Evaluation Report and Final Data for the Huntsville Gas Company Site. When PRGs were developed based on both carcinogenic and non-carcinogenic risk, the lower of the two PRG values is presented in Table 2.

Residential PRGs apply to the top 1 foot of surface soil at the Site while Construction/Utility PRGs apply to subsurface soil at a depth of 1 to 4 feet. Construction/Utility PRGs are based on the assumption that subsurface soil below 1 foot will continue to be subsurface soil in the future and that only an adult worker would be exposed to subsurface soil. Soil PRGs are based on direct contact with soil and include the following exposure routes: incidental ingestion, dermal contact, and inhalation of particulates. Residential PRGs are based on USEPA Regional Screening Levels (RSLs) (USEPA, 2010). USEPA RSLs were updated following submittal of the RAWP; therefore, PRGs presented in Table 2 are consistent with current USEPA RSLs (USEPA, 2010).

Construction/Utility PRGs are based on adult worker exposure to soil for 250 days for a 1-year construction project. Construction worker exposure assumptions are based on default values provided by the Alabama Department of Environmental Management (ADEM, 2008).

Comparison of the soil data to the PRGs shows that no volatile organic compounds were detected above the Residential PRG based on an HQ of 1.0 in soil samples collected in the surface and shallow subsurface zones. Concentrations of PAHs above the Residential PRGs based on cancer risk including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(g,h,i)perylene, and indeno(1,2,3-cd)pyrene were detected in 11 soil samples collected from the following surface soil sample locations: HG-RES-15-1-1, HG-RES-15-2-1, HG-RES-18-1-1, HG-RES-24-2-1, HG-RES-25-1-1, HG-RES-27-1-1, HG-RES-27-3-1, HG-RES-30-1-1, HG-RES-31-1-1, HG-RES-32-1-1, HG-Res-41-SW (collected at the base of the un-named ditch slope), and TWP-1-1. No organic compounds were detected above PRGs in shallow subsurface soil samples. Concentrations of compounds exceeding PRGs are presented on Figure 2 for each soil boring location.

No inorganic compounds were detected above Residential PRGs based on cancer risk in soil samples collected in the surface and shallow subsurface zones. Lead concentrations exceeded the Residential PRG of 400 milligrams per kilogram (mg/kg) in four samples HG-RES-18-1-1 (514 mg/kg), HG-RES-18-2-1 (487 mg/kg), HG-RES-27-3-1 (447 mg/kg). Concentrations of inorganic compounds exceeding PRGs are also presented on Figure 2 for each soil boring location.

2.0 Subsurface Soil Investigation

Per the RAWP, 10 soil borings were completed to refusal at the bedrock surface. These soil borings were intended to provide vertical delineation of any potential free and/or residual product. The soil borings advanced to refusal included HG-RES-05-2, HG-RES-15-1, HG-RES-19-1, HG-RES-24-1, HG-RES-24-2, HG-RES-25-1 (TWP-6), HG-RES-28-1, HG-RES-28-2, HG-RES-29-1 (TWP-2), HG-RES-30-1 (TWP-5), HG-RES-31-1, HG-RES-32-1 (TWP-3), TWP-1, and TWP-4. The depth of refusal in each of these soil borings ranged from a minimum of approximately 9.5 feet in HG-RES-24-1 to a maximum of approximately 36.0 feet in two soil borings HG-RES-05-2 and HG-RES-28-1. It should be noted that refusal encountered in HG-RES-24-1 was due to the large holder wall foundation and is not indicative of the bedrock surface. The bedrock surface ranged from approximately 20.5 to 36 feet bgs.

Indications of impacts to the subsurface soils including elevated readings with the photoionization detector (PID), coating and sheens on the soil grains and pore-space water, and odors were observed in all of the deeper soil borings with the exception of HG-RES-05-2, HG-RES-28-1, HG-RES-28-2, and TWP-4. The highest PID reading, 1,400 parts per million (ppm), or instrument units above background, was detected in soil boring HG-RES-29-1 (TWP-2) at a depth of approximately 19.5 feet bgs. Visual indications of the presence of Dense Non-Aqueous Phase Liquids (DNAPL) were also observed in HG-RES-29-1 (TWP-2) when the temporary well screen was removed and noted to be coated with a tar-like substance from the portion of the well screen corresponding to 35 feet to 28 feet bgs.

GEI collected subsurface soil samples from several of the soil borings. The RAWP did not call for any soil samples to be collected below 4.0 feet bgs. However, based on the visual observations, it was determined in consult with the EPA OSC that collection of deeper samples for vertical delineation would be prudent. The OSC was also concerned with establishing subsurface soil

background concentrations. It was decided that soil samples would be collected from the soil boring completed for the installation of temporary well point TWP-4.

A total of eight (8) subsurface soil samples were submitted for analysis. The subsurface soil samples were analyzed for the same parameters as the surface soil and shallow subsurface soils, BTEX, PAHs, and metals. The results of the laboratory analysis are presented in Table 3 (attached). No numerical standards for soils underlying 4.0 feet bgs have been established for the Site at this time. It should be noted that no organic compounds were detected in soil samples collected from TWP-4 at 9.5'-10.0' bgs and 20.0'-20.5' bgs. In addition, soil samples HG-RES-15-1-3 (12.0'-12.5') and HG-RES-32-1-3 (10.0'-10.5') provide data for vertical delineation of compounds exceeding PRGs in surface and shallow subsurface soil samples. Soil sample HG-RES-29-1-3 provides analytical data for soils collected from the soil interval with the highest PID reading at the Site.

3.0 Un-named Ditch and Pinhook Creek Sediment Investigation

The RAWP called for the collection of three (3) sediment samples in the un-named ditch (drainage swale) at locations HG-RES41, HG-RES-42, and HG-RES-43. GEI collected two (2) additional sediment samples in the un-named ditch, referenced as SED-4-SWALE and SED-5-SWALE. The OSC requested that these additional upstream sediment samples be collected; one in the area of the large holder and one upgradient near an observed out cropping of coal-like fill material located outside of the MGP footprint. GEI collected three (3) sediment samples in Pinhook Creek referenced as PC-SED-1, PC-SED-2, and PC-SED-3 per the RAWP. Sediment sample PC-SED-3 was collected upstream of the confluence of Pinhook Creek with the un-named ditch, PC-SED-2 was collected at the confluence of Pinhook Creek with the un-named ditch, and PC-SED-1 was collected downstream of the confluence of Pinhook Creek with the un-named ditch

The sediment samples were analyzed for the same parameters as the soil samples, BTEX, PAHs, and metals. GEI evaluated the laboratory analytical results for the sediment samples collected in the un-named ditch differently than the sediment samples collected from Pinhook Creek. The un-named ditch is a man-made swale designed for stormwater drainage and has been observed to be intermittently dry. During storms, there is a high-energy flow regime which can cause substantial erosion. Based on this, the un-named ditch is not a viable ecological habitat in comparison to Pinhook Creek. The primary concern for sediment in the un-named ditch is residential exposure via direct contact. Therefore, the laboratory analytical results for the un-named ditch sediment samples are compared to the residential soil PRGs in Table 2. No concentrations of compounds exceeded the PRGs in sediment samples collected from the un-named ditch.

Table 4 (attached) compares the results of the Pinhook Creek sediment analysis to the EPA Region 4 sediment screening values. No compounds detected in sediment exceeded established screening values, with the exception of arsenic and lead. Arsenic exceeded the effects value and screening value of 7.24 mg/kg in all of the sediment samples. Lead exceeded the effects value and screening value of 30.2 in only one sediment sample (PC-SED-1). All of the sediment samples had detected concentrations of BTEX and PAH compounds.

4.0 Groundwater Investigation

GEI completed a groundwater investigation at the Site through installation and monitoring of temporary well points and piezometers. Four (4) temporary well points, referenced as TWP-1 through TWP-4 were proposed to be installed per the RAWP. Temporary well points were installed per the RAWP at the TWP-1 and TWP-4 locations. The proposed TWP-2 location was installed within soil boring HG-RES-29-1 and the proposed TWP-3 location was installed within soil boring HG-RES-32-1. Two additional well points were installed as piezometers to augment data points for a better determination of groundwater flow; TWP-5 was installed in soil boring HG-RES-30-1 and TWP-6 was installed in soil boring HG-RES-25-1.

The piezometers were screened from refusal (assumed bedrock surface) which ranged from approximately 20.5 to 36 feet below grade to approximately 5 feet below grade. Based on depth-to-water measurements, it was determined that a confined aquifer is present immediately overlying the bedrock underlying the site. The confining layer consists of clayey soils present from approximately 15 to 20 feet below grade. A water table aquifer is also present underlying the site. A piezometer was installed approximately 30 feet to the southwest of HG-RES-29-1 (TWP-2) to an approximate depth of 10 feet below grade. A head differential of approximately 2 feet was observed between the wells screened to the bedrock surface and the piezometer. Groundwater in the confined aquifer was determined to flow to the west/southwest from TWP-4 to the swale and Pinhook Creek at an approximate gradient of 0.025 ft./ft.

Groundwater samples were collected from temporary well points TWP-1 through TWP-4. The samples were analyzed for BTEX, PAHs, and metals. The results of the laboratory analysis are presented in Table 5 (attached). Dissolved-phase concentrations of BTEX and PAHs were detected in all of the wells. In temporary well TWP-4, benzene and toluene were detected at concentrations below the EPA drinking water standards. In the remaining temporary wells points, higher dissolved-phase concentrations were detected; with the maximum concentrations detected in temporary well point TWP-2.

The concentrations detected in the temporary well points are most-likely artificially high. However, the data does indicate that there is a dissolved-phase plume present in the confined aquifer immediately overlying the bedrock and possibly impacts to the overlying water table aquifer.

5.0 Structure Investigation

GEI completed contingency task 1 (Section 4.7 of the RAWP) on May 19 and 20 with no impact to the overall initial schedule. Five (5) test pits were excavated at the site (see Figure 1). GEI located the test pits based on the preliminary GPR survey and test boring data. Soil boring HG-RES-24-1 was located in the area of the large holder. Refusal was encountered at 9.5 feet in HG-RES-24-1, which indicated the presence of the holder in that location. The preliminary GPR report also showed the possible holder location near HG-RES-24-1. Test Pit TP-1 was excavated between the possible holder wall as delineated from the GPR preliminary report and soil boring HG-RES-24-1.

The large holder wall was identified and exposed in test pit TP-1, with the test pit located on the exterior of the holder. No indications of impacts to the soils were observed in TP-1. It was determined that soil boring HG-RES-24-1 was advanced directly adjacent to the holder wall and

that refusal was encountered on the holder foundation at 9.5 feet below grade. Test pit TP-2 was then excavated in the interior of the large holder from the identified wall extending 10 feet into the interior of the large holder. The test pit extended to a maximum depth of approximately 10 feet below grade. No base for the holder was encountered at this depth. No impacts were observed within the interior of the large holder.

GEI could not excavate additional test pits within the holder due to the presence of utilities and surface features. We estimated the location of the footprint of the large holder based on the exposed wall. The location closely matches the estimated location plotted in Figure 3 of the RAWP, which was based on the Sanborn fire insurance maps. The approximate location of the large holder is presented in Figure 1.

The approximate location of the small holder was estimated based on the identified large holder wall and the preliminary GPR report. GEI excavated test pit TP-3 to locate the small holder wall. The wall was identified approximately 1.5 feet below grade. The test pit exposed the interior of the small holder which was observed to be filled with demolition debris. Naphthalene-like odors and tarry soils were encountered at an approximate depth of 4 feet below grade. Due to the observed impacts, GEI terminated the soil boring at approximately 5 feet for health and safety purposes. Impacted soil spoils were returned to the excavation and covered with un-impacted soils. A second test pit, TP-4 was excavated to verify the location of small holder wall approximately on the opposite side of the holder wall identified in test pit TP-3. The wall was exposed and the location of the center of the small holder was more accurately determined.

GEI excavated test pit TP-5 to identify the western boundary of the coal shed on the western part of the Site. The test pit extended to an approximate depth 9 feet below grade. No intact elements of the coal shed were identified in the test pit. Demolition debris, presumably from the coal shed was exposed including brick wall sections and floor slab, intermixed with coal-like material and soil.

6.0 Summary and Conclusions

The following summary is based on the preliminary field and laboratory data collected per the approved RAWP:

- Concentrations of PAHs exceeding the established Residential PRGs for the Site were detected in 14 of the 34 surface soil samples. No BTEX or metals compounds were detected in concentrations exceeding the Residential PRGs in any of the samples. No exceedances of the Construction/Utility PRGs were detected in and of the shallow subsurface soil samples.
- Soil impacts are present in surface and subsurface soils. These impacts appear to be confined to the area of the MGP operations, particularly the holders and purifier house. Tar-like material, staining and sheens related to the MGP operation are present in the underlying unconsolidated aquifer. The presence of these materials has not been completely delineated vertically or horizontally.
- The small and large holders have been identified and are present at the Site. Impacts were observed in the soils contained in the small holder. No impacts were observed in the soil in the interior of the large holder.

- Dissolved-phase impacts are likely present in the groundwater underlying the Site
- Arsenic and lead were the only two compounds to exceed the EPA Region 4 sediment effects values and screening values in the sediment samples collected from Pinhook Creek. Concentrations of BTEX and PAHs were detected in all of the sediment samples collected from Pinhook Creek at concentrations below EPA Region 4 sediment effects values and screening values. The presence of these compounds at relatively consistent concentrations in both the upgradient and downgradient samples may represent background concentrations in the area, but suggest that compounds are coming from an off-site source. Based on this data, additional ecological assessment of the Pinhook Creek is not warranted at this time. GEI recommends collecting additional sediment samples from the Pinhook Creek and un-named ditch following the completion of proposed remedial actions to confirm that upgradient sources are contributing to the detected sediment concentrations and that the Site is not a continuing source with the potential to cause ecological impacts.

7.0 Additional Site Characterization Scope of Work

In Section 4.15 of the RAWP, GEI proposed five (5) contingency tasks to be implemented based on field observations as necessary. A discussion of each task is presented below:

- As stated previously, GEI completed contingency Task 1 (Section 4.7 of the RAWP) on May 19 and 20 with no impact to the overall initial schedule. Five (5) test pits were excavated at the site (see Figure 1). To augment Task 1 GEI proposes completing additional direct-push soil borings within the identified small and large holder areas. Completion of the soil borings will aid in more-accurately determining the depth of the holders, the construction of the bases of the holders, and the extent of impacts in the holders from residual MGP materials. To accomplish this, GEI will advance 4 soil borings in the interior of the large holder and 3 soil borings in the interior of the small holder. The proposed locations of these soil borings are presented in Figure 4 (attached). These borings will be advanced to depths required to characterize the material present within each holder, but will not be advanced beyond the base of the holders to prevent potential downward migration of any residual MGP material. Additional soil borings completed on the perimeter of the small and large holders will be advanced to the bedrock surface.
- Contingency Task 2 (Section 4.8 of the RAWP) requires completion if non-aqueous phase liquids/residual MGP-related materials were observed in the deeper soil borings. GEI observed indications of soil impacts present below 4 feet in several soil borings including HG-RES-19-1, HG-RES-30-1, HG-RES-31-1, HG-RES-32-1, HG-RES-29-1, HG-RES-24-2, and TWP-1. The observed impacts included elevated PID readings, coatings and sheen on soil grains and groundwater, and in TWP-1, a tar-like coating on the temporary well casing following removal from the soil boring. Based on these observations, additional investigation and delineation of free and/or residual product is proposed as a contingency task as described in section 4.8 of the RAWP.
 - Based on observed subsurface conditions, contingency Task 2 will be modified from the original work plan due to the localized nature of identified impacts. In lieu of the TarGOST GEI will delineate impacts observed in TWP-2 using a direct-push drill rig. The proposed locations of the soil borings are presented in Figure 4

(attached). GEI will retrieve soils from the ground surface until refusal is encountered at the bedrock surface. The subsurface soils will be reviewed for the presence of impacts through visual and olfactory observations and scanning using a PID.

- Contingency Task 3 (Section 4.9 of the RAWP) outlines investigations into the bedrock underlying the Site to vertically delineate the presence of DNAPL. Prior to implementation of contingency Task 3, GEI recommends installing four permanent monitoring wells terminated at the bedrock surface. Installation of these wells will achieve two objectives. First they will more accurately characterize the potential dissolved-phase plume identified through the sampling of the temporary well points. Secondly they will allow GEI to more accurately determine if significant quantities of DNAPL have accumulated on the bedrock and prior to vertical delineation into the bedrock.

These wells will be screened from the bedrock surface to 10 feet above the bedrock surface and will be constructed with 2" diameter slotted PVC screened with solid PVC riser to reach the surface. All wells will be completed with flush-mount protective caps. The location and elevation of each well will be surveyed by a licensed surveyor.

The wells will be developed using a submersible pump until the water is turbid free. All development water will be containerized in either DOT-approved 55-gallon drums, or a holding tank if the volume of development water warrants it. The wells will be allowed to equilibrate for a minimum of 24 hours following development. Following the equilibration period, GEI will probe each well with an oil/water interface meter to identify any potential DNAPL.

GEI will return to the Site a minimum of two weeks after the development to collect dissolved-phase samples. Prior to sampling, the depth to groundwater in each of the four wells will be measured. Each of the wells will be purged using low flow techniques. In-situ testing (i.e., temperature, pH, dissolved oxygen, oxidation-reduction potential, and conductivity) of the groundwater will be performed continuously during well purging. Purging will continue until the groundwater parameters stabilize. Purge water will be containerized on-site with the development water for future classification and disposal.

Upon completion of purging, a groundwater sample will be collected from each well using low flow sampling techniques. The collected groundwater samples will be immediately transferred into laboratory-prepared sample bottles. The collected groundwater samples will be stored in a cooler containing ice, prior to transport to a certified laboratory for analyses. The collected groundwater samples will be analyzed for BTEX, PAHs, arsenic, lead, and mercury, using the same EPA methods previously employed for sample analysis at the Site.

- The decision to implement contingency Task 4 (Section 4.10 Soil Gas Sampling in the RAWP) will be made following completion of contingency Task 2.
- As discussed in Section 6.0, completion of Task 5, forensic analysis related to sediment impacts in the Pinhook Creek is not warranted at this time. GEI recommends collecting additional sediment samples from the Pinhook Creek and un-named ditch following the

completion of proposed remedial actions to confirm that upgradient sources are contributing to the detected sediment concentrations and that the Site is not a continuing source with the potential to cause ecological impacts.

8.0 Revised Project Schedule

Following approval of the implementation of the contingency tasks discussed above, GEI can mobilize to the Site within three weeks. The RAWP contemplated these contingency activities and presented anticipated schedule impacts. The schedule impact for Contingency Task 2 presented in the RAWP was 6 weeks; the impact for Contingency Task 3 was 3 weeks. As these tasks can be completed during the same mobilization, we estimate a total schedule impact of 6 weeks. The remainder of the proposed removal action schedule approved in the RAWP will be modified as follows:

Task/Milestone	Estimated Task/Milestone Duration (weeks)
Mobilization for Contingency Tasks from EPA Approval	3 weeks
Contingency Investigation Activities	3 weeks
Prepare Bid Documents for Removal Action	12 weeks from completion of investigation
Commencement of removal activities	20 weeks from acceptance of revised RAWP and CBSP
Submission RA Report to EPA	12 weeks from completion of removal activities

If you have any questions, feel free to contact me at (856) 608-6860 or by email at dunites@geiconsultants.com.

Sincerely,



Dennis Unites
Project Coordinator

Attachments

cc: C. Brown (Alagasco)
S. Chapman (Alagasco)
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Table 1
Soil Boring and Sample Summary
Removal Action Work Plan Investigation
Huntsville Former MGP Site
Huntsville, Alabama

Soil Boring Number	Date Started	Date Completed	Total Depth (feet)	Laboratory Sample Number	Depth (feet)	Compounds		Concentration (µg/Kg organics mg/Kg metals)
						BTEX (EPA 8260B)	PAHs (EPA 8270C with SIM Analysis)	
HG-RES-05-1	5/12/2010	5/12/2010	4.0	N	0.0	NA	HG-RES-05-1-1	0.0-1.0
HG-RES-05-2	5/12/2010	5/12/2010	36.0	N	0.0	NA	HG-RES-05-1-2	2.5-3.0
HG-RES-07-1	5/12/2010	5/12/2010	4.0	N	0.0	NA	HG-RES-05-2-1	0.0-1.0
HG-RES-08-1	5/12/2010	5/12/2010	4.0	N	0.0	NA	HG-RES-05-2-2	2.5-3.0
HG-RES-12-1	5/18/2010	5/18/2010	4.0	N	0.0	NA	HG-RES-07-1-1	0.0-1.0
HG-RES-14-1	5/18/2010	5/18/2010	4.0	N	0.0	NA	HG-RES-07-1-2	2.5-3.0
HG-RES-14-2	5/18/2010	5/18/2010	4.0	N	0.0	NA	HG-RES-08-1-1	0.0-1.0
HG-RES-14-3	5/18/2010	5/18/2010	4.0	N	0.0	NA	HG-RES-08-1-2	2.5-3.0
HG-RES-15-1	5/14/2010	5/14/2010	12.5	Y	0.0	NA	HG-RES-12-1-1	0.5-1.0
HG-RES-15-2	5/18/2010	5/18/2010	4.0	N	3.4	4	HG-RES-12-1-2	3.5-4.0
HG-RES-16-1	5/18/2010	5/18/2010	4.0	N	0.0	NA	HG-RES-14-1-1	0.5-1.0
HG-RES-17-1	5/18/2010	5/18/2010	4.0	N	0.0	NA	HG-RES-14-1-2	3.5-4.0
							HG-RES-14-2-1	0.5-1.0
							HG-RES-14-2-2	3.5-4.0
							HG-RES-14-3-1	0.5-1.0
							HG-RES-14-3-2	3.5-4.0
							HG-RES-15-1-1	0.5-1.0
							HG-RES-15-1-2	3.5-4.0
							HG-RES-15-1-3	12.0-12.5
							HG-RES-15-2-1	0.5-1.0
							HG-RES-15-2-2	3.5-4.0
							HG-RES-16-1-1	0.5-1.0
							HG-RES-16-1-2	3.5-4.0
							HG-RES-17-1-1	0.5-1.0
							HG-RES-17-1-2	3.5-4.0

Table 1
Soil Boring and Sample Summary
Removal Action Work Plan Investigation
Huntsville Former MGP Site
Huntsville, Alabama

Soil Boring Number	Date Started	Date Completed	Total Depth (feet)	Visual Indications of Impacts Detected Y/N	Maximum PID Readings (ppm)	PID Readings (ppm)	Depth of Maximum (feet)	Laboratory Sample Number	Compounds				Concentration (µg/kg organics/mg/kg metals)
									Exceedances of Metals (EPA 6010/T470A)	Exceedances of PIDs Detected (EPA 6010/T470A)	Compounds	Compounds	
HG-RES-18-1	5/18/2010	5/18/2010	4.0	N	0.0	NA		HG-RES-18-1-1	0.5-1.0	X	X	Y	Benz(a)anthracene Benz(a)pyrene Benz(b)fluoranthene Dibenz(a,h)anthracene
HG-RES-18-2	5/18/2010	5/18/2010	4.0	N	0.0	NA		HG-RES-18-1-2	3.5-4.0	X	X	N	
HG-RES-19-1	5/17/2010	5/17/2010	24.0	Y	243.8	6.5	HG-RES-18-2-1	0.5-1.0	X	X	X	N	
HG-RES-22/23-1	5/18/2010	5/18/2010	4.0	N	0.0	NA	HG-RES-18-2-2	3.5-4.0	X	X	X	N	No Laboratory Samples Collected
HG-RES-24-1	5/12/2010	5/13/2010	9.5	N	0.0	NA	HG-RES-22/23-1-1	0.5-1.0	X	X	X	N	
							HG-RES-22/23-1-2	3.5-4.0	X	X	X	N	
							HG-RES-24-1-1	0.5-1.0	X	X	X	N	
							HG-RES-24-1-2	3.5-4.0	X	X	X	N	
							HG-RES-24-1-3	9.0-9.5	Sample not analyzed	NA	NA		
													Benz(a)anthracene Benz(a)pyrene Benz(b)fluoranthene Dibenz(a,h)anthracene Indeno(1,2,3-cd)pyrene Lead
HG-RES-24-2	5/14/2010	5/15/2010	30.0	Y	246.6	27.0		HG-RES-24-2-1	0.5-1.0	X	X	Y	
HG-RES-25-1 (TWP-6)	5/14/2010	5/14/2010	34.0	Y	165.8	9.5		HG-RES-24-2-2	3.5-4.0	X	X	N	
HG-RES-26-1	5/12/2010	5/12/2010	4.0	N	0.0	NA		HG-RES-24-2-3	25.0-25.5	Sample not analyzed	NA		
HG-RES-26-2	5/17/2010	5/17/2010	4.0	N	0.0	NA		HG-RES-25-1-1	0.5-1.0	X	X	Y	Benz(a)pyrene
								HG-RES-25-1-2	3.5-4.0	X	X	X	
								HG-RES-25-1-3	9.5-10.0	Sample not analyzed	NA		
								HG-RES-26-1-1	0.5-1.0	X	X	N	
								HG-RES-26-1-2	3.5-4.0	X	X	N	
								HG-RES-26-2-1	0.5-1.0	X	X	N	
								HG-RES-26-2-2	3.5-4.0	X	X	N	

Unvalidated Data

Table 1
Soil Boring and Sample Summary
Removal Action Work Plan Investigation
Huntsville Former MGP Site
Huntsville, Alabama

Soil Boring Number	Date Started	Date Completed	Total Depth (feet)	Visual Indications of Impacts	Maximum PID Readings (ppm)	PID Readings Y/N	Laboratory Sample Number	Depth (feet)	Compounds			Concentration (µg/kg organics /mg/kg metals)
									BTEX (EPA 8260B)	PAHs (EPA 8270C with SIM Analysis)	Metals (EPA 6010/7470A)	
HG-RES-27-1	5/17/2010	5/17/2010	4.0	N	0.0	NA	HG=RES-27-1-1	0.5-1.0	X	X	Y	Benz(a)pyrene 2,300
HG-RES-27-2	5/17/2010	5/17/2010	4.0	N	0.0	NA	HG=RES-27-1-2	3.5-4.0	X	X	X	NA
HG-RES-27-3	5/17/2010	5/17/2010	4.0	N	0.0	NA	HG=RES-27-2-1	0.5-1.0	X	X	X	NA
HG-RES-28-1	5/13/2010	5/13/2010	36.0	N	0.0	NA	HG=RES-27-2-2	3.5-4.0	X	X	X	NA
HG-RES-28-2	5/17/2010	5/17/2010	36.0	N	0.0	NA	HG=RES-27-3-1	0.5-1.0	X	X	Y	Benz(a)pyrene 2,100
HG-RES-28-1 (TWP-2)	5/17/2010	5/17/2010	35.0	Y	1400	19.5	HG-RES-28-1-1	0.5-1.0	X	X	X	NA
HG-RES-30-1 (TWP-5)	5/12/2012	5/12/2010	20.5	Y	88.8	12.5	HG-RES-28-1-2	0.5-1.0	X	X	X	PRGs not established for soils below 4 feet
HG-RES-31-1	5/12/2012	5/13/2010	23.0	Y	376.5	11.0	HG-RES-29-1-3	19.5-20.0	X	X	X	NA
							HG-RES-30-1-1	0.5-1.0	X	X	Y	Benz(a)anthracene 36,000
							HG-RES-30-1-2	3.5-4.0	X	X	X	Benz(a)pyrene 36,000
							HG-RES-30-1-3	9.5-10.0	Sample not analyzed	NA	NA	Benz(b)fluoranthene 50,000
							HG-RES-31-1-1	0.5-1.0	X	X	X	Dibenz(a,h)anthracene 6,400
							HG-RES-31-1-2	4.5-5.0	Sample not analyzed	NA	NA	Indeno(1,2,3-cd)pyrene 19,000
							HG-RES-31-1-3	8.5-9.0	Sample not analyzed	NA	NA	Benz(e)pyrene 20,000
							HG-RES-31-1-4	11.5-12.0	X	X	X	Benz(f)fluoranthene 30,000
							HG-RES-31-1-5	22.5-23.0	X	X	X	Dibenz(a,h)anthracene 4,500
												Indeno(1,2,3-cd)pyrene 14,000

Table 1
Soil Boring and Sample Summary
Removal Action Work Plan Investigation
Huntsville Former MGP Site
Huntsville, Alabama

Soil Boring Number	Date Started	Date Completed	Total Depth (feet)	Depth of Maximum PDI Readings (feet)	Laboratory Sample Number	Depth (feet)	Compounds			Concentration (µg/Kg organics mg/Kg metals)	
							PDI Readings (ppm) Detected Y/N	PRGs Detected Y/N	Exceedance of PRGs not established for soils below 4 feet		
HG-RES-32-1 (TWP-3)	5/12/2012	5/13/2010	29.5	Y	52.2	5	HG-RES-32-1-1 HG-RES-32-1-2 HG-RES-32-1-3	0.5-1.0 3.5-4.0 10.0-10.5	X X X	Y N NA	Benz(a)pyrene 5,000
HG-RES-33-1	5/17/2010	5/17/2010	4.0	N	0.0	NA	HG-RES-33-1-1 HG-RES-33-1-2 HG-RES-33-2-1	0.5-1.0 3.5-4.0 0.5-1.0	X X X	X X NA	PRGs not established for soils below 4 feet
HG-RES-33-2	5/17/2010	5/17/2010	4.0	N	0.0	NA	HG-RES-33-2-2	3.5-4.0	X	X	
HG-RES-36-1	5/17/2010	5/17/2010	4.0	N	0.0	NA	HG-RES-36-1-1 HG-RES-36-1-2	0.5-1.0 3.5-4.0	X X	X X	
HG-RES-36-2	5/17/2010	5/17/2010	4.0	N	0.0	NA	HG-RES-36-2-1	0.5-1.0	X	X	
HG-RES-39-1	5/17/2010	5/17/2010	4.0	N	0.0	NA	HG-RES-39-1-1	0.5-1.0	X	X	
HG-RES-41	5/20/2010	5/20/2010	0.5	N	0.0	NA	HG-RES-39-1-2 HG-RES-41-SW	3.5-4.0 0.0-0.5	X X	X Y	Benz(a)pyrene 9,100
HG-RES-42	5/20/2010	5/20/2010	0.5	N	0.0	NA	HG-RES-42-SW	0.0-0.5	X	X	
HG-RES-43	5/20/2010	5/20/2010	0.5	N	0.0	NA	HG-RES-43-SW	0.0-0.5	X	X	
TWP-1	5/13/2012	5/13/2010	32.0	Y	123.2	22.5	TWP-1-1	0.5-1.0	X	X	Benz(a)anthracene 15,000
TWP-4	5/14/2010	5/14/2010	34.5	N	0.0	NA	TWP-1-2 TWP-4-1 TWP-4-2	3.5-4.0 9.5-10.0 20.0-20.5	X X X	X X X	Benz(e)pyrene Benz(b)fluoranthene Dibenz(a,h)anthracene 2,600
											PRGs not established for soils below 4 feet
											PRGs not established for soils below 4 feet

Table 2
Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP Site
Huntsville, Alabama

Unvalidated Data

Compound	CASRN	Residential Soil PRGs	Residential Soil Construction/Utility Soil PRGs	HG-RES-05-1-1 Sample Depth: 0.0-1.0' Lab ID: 1005B49-013B Date Sampled: 05/13/10 Matrix: Soil Dilution Factor: 1	HG-RES-05-1-2 Sample Depth: 3.5-4.0' Lab ID: 1005B49-008A Date Sampled: 05/13/10 Matrix: Soil Dilution Factor: 1	HG-RES-05-2-1 Sample Depth: 0.0-1.0' Lab ID: 1005B49-025A Date Sampled: 05/13/10 Matrix: Soil Dilution Factor: 1	HG-RES-05-2-2 Sample Depth: 3.5-4.0' Lab ID: 1005B49-009A Date Sampled: 05/13/10 Matrix: Soil Dilution Factor: 1	HG-RES-07-1-1 Sample Depth: 0.0-1.0' Lab ID: 1005H21-028A Date Sampled: 04/31/10 Matrix: Soil Dilution Factor: 1	HG-RES-07-1-2 Sample Depth: 2.5-3.0' Lab ID: 1005D29-011A Date Sampled: 04/31/10 Matrix: Soil Dilution Factor: 1
VOCs (mg/Kg)									
Benzene	71-43-2	86,000	341,000	1.1 U	0.91 U	1.1 U	0.93 U	0.69 U	1.0 U
Ethylbenzene	100-41-4	3,500,000	15,600,000	1.1 U	0.91 U	1.1 U	0.93 U	0.69 U	1.0 U
m,p-Xylene	1330-20-7	630,000	2,160,000	1.1 U	0.91 U	1.1 U	0.93 U	0.69 U	1.0 U
o-Xylene	1330-20-6	630,000	2,160,000	1.0 U	0.91 U	1.1 U	0.93 U	0.69 U	1.0 U
Toluene	108-88-3	5,000,000	29,400,000	1.1 U	0.91 U	1.4	0.93 U	0.69 U	1.0 U
PAHs (mg/Kg)									3.2
Aceanaphthalene	83-32-9	3,400,000	18,900,000	240 U	230 U				
Acenaphthylene	208-96-8	1,700,000	9,430,000	240 U	230 U				
Anthracene	120-12-7	17,000,000	94,300,000	240 U	230 U				
Benz(a)anthracene	56-55-3	15,000	3,010,000	240 U	230 U				
Benz(a)pyrene	50-32-8	1,500	301,000	240 U	230 U				
Benz(b)fluoranthene	205-99-2	15,000	3,010,000	240 U	230 U				
Benz(o,g,h,i)perylene	191-24-2	1,700,000	9,430,000	240 U	230 U				
Benz(k)fluoranthene	207-08-9	150,000	30,100,000	240 U	230 U				
Chrysene	218-01-9	1,500,000	100,000,000	240 U	230 U				
Dibenz(a,h)anthracene	53-70-3	1,500	301,000	240 U	230 U				
Fluoranthene	206-44-0	2,300,000	12,600,000	240 U	230 U				
Fluorene	86-73-7	2,300,000	12,600,000	240 U	230 U				
Indeno(1,2,3-cd)pyrene	193-39-5	15,000	3,010,000	240 U	230 U				
Naphthalene	91-20-3	140,000	484,000	240 U	230 U				
Phenanthrene	85-01-8	1,700,000	9,430,000	240 U	230 U				
Pyrene	129-00-0	1,700,000	9,430,000	240 U	230 U	250	230 U	230 U	230 U
Metals (mg/Kg)									
Mercury	7439-97-6	5.6	24.9	0.117 U	0.115 U	0.718	0.480	0.436	0.117 U
Arsenic	7440-38-2	39	435	7.08	9.24	13.2	11.7	7.99	0.613
Lead	7439-92-1	400	800	13.3	17.9	89.1	119	109	7.81
Notes:									9.56

mg/kg = milligrams per kilogram

µg/kg = micrograms per kilogram

PRG = Proposed Removal Goal

Residential Soil PRGs apply to surface soil at depths of 0 to 1 foot.

Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.

Shaded and bolded cell indicates compound concentration exceeds a PRG.

CASRN - Chemical Abstract Services Registry Number

Unvalidated Data

Table 2.
Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP Site
Huntsville, Alabama

Sample ID	HG-RES-08-1-2	HG-RES-12-1-1	HG-RES-12-1-2	HG-RES-14-1-1	HG-RES-14-1-2	HG-RES-14-2-1	HG-RES-14-2-2
Sample Depth:	3.5'4.0'	0.5-1.0	3.5'-4.0'	0.0-1.0'	3.54.0'	0.5'-1.0'	3.54.0'
Lab ID:	1005H21-023A	1005H21-005A	1005H21-012A	1005H21-003A	1005H21-001B	1005H21-022A	1005H21-011A
Date Sampled:	05/13/10						
Matrix:	Soil	Soil	Soil	Soil	Soil	Soil	Soil
Dilution Factor:	1	1	1	1	1	1	1
Compound	CASRN	Residential Soil PRGs	Construction/Utility Soil PRGs				
VOCs (µg/Kg)							
Benzene	71-43-2	86,000	347,000	1.2 U	1.2 U	0.66 U	1.3 U
Ethylbenzene	100-41-4	3,500,000	15,600,000	1.2 U	1.2 U	0.66 U	1.3 U
m,p-Xylene	1330-20-7	630,000	2,160,000	1.2 U	1.2 U	0.66 U	1.3 U
o-Xylene	1330-20-6	630,000	2,160,000	1.2 U	1.2 U	0.66 U	1.3 U
Toluene	106-48-3	5,000,000	29,400,000	1.9	1.2 U	0.66 U	1.3 U
PAHs (µg/Kg)							
Acenaphthene	83-32-9	3,400,000	18,900,000	240 U	230 U	240 U	230 U
Acenaphthylene	208-96-8	1,700,000	9,430,000	240 U	540	240 U	230 U
Anthracene	120-12-7	17,000,000	94,300,000	240 U	460	240 U	230 U
Benz(a)anthracene	56-55-3	15,000	3,010,000	240 U	1900	240 U	230 U
Benz(a)pyrene	50-32-8	1,500	301,000	240 U	2200	240 U	1300
Benz(b)fluoranthene	205-99-2	15,000	3,010,000	240 U	3500	240 U	1300
Benz(c,h,i)fluoranthene	191-24-2	1,700,000	9,430,000	240 U	1600	240 U	2000
Benz(k)fluoranthene	207-08-9	150,000	30,100,000	240 U	1100	240 U	750
Chrysene	218-01-9	1,500,000	100,000,000	240 U	2300	240 U	650
Dibenz(a,h)anthracene	53-70-3	1,500	301,000	240 U	230 U	240 U	1300
Fluoranthene	206-44-0	2,300,000	12,600,000	240 U	4800	240 U	230 U
Fluorene	86-73-7	2,300,000	12,600,000	240 U	230 U	240 U	2200
Indeno(1,2,3-cd)pyrene	193-39-5	15,000	3,010,000	240 U	1600	240 U	230 U
Naphthalene	91-20-3	140,000	484,000	240 U	260	240 U	720
Phenanthrene	85-01-8	1,700,000	9,430,000	240 U	3600	240 U	240 U
Pyrene	129-00-0	1,700,000	9,430,000	240 U	4300	240 U	830
Metals (mg/Kg)							
Mercury	7439-97-6	5.6	24.9	0.933	0.112 U	0.954	0.115 U
Lead	7440-38-2	39	435	14.6	5.57 U	5.23 U	5.23 U
Uranium	7439-92-1	400	800	355	17.3	164	163
Notes:							

Notes:
mg/kg = milligrams per kilogram
μg/kg = micrograms per kilogram

PRG = Proposed Removal Goal

RCG - I proposed Reunited Guadalupe Islands International Soil RRG

residual soil PRGs apply to surface soil at depths of 0 to 1 foot.

Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.

haded and bolded cell indicates compound concentration exceeded

ASRN - Chemical Abstract Services Registry Number

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Unvalidated Data

Table 2
Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP Site
Huntsville, Alabama

Compound	CASRN	Residential Soil PRGs	Construction/Utility Soil PRGs	Sample ID	Sample Depth:	HG-RES-14-3-1 0.5'-1.0'	HG-RES-14-3-2 3.5'-4.0'	HG-RES-15-1-1 0.5'-1.0'	HG-RES-15-1-2 3.5'-4.0'	HG-RES-15-2-1 0.5'-1.0'	HG-RES-15-2-2 3.5'-4.0'
VOCs (µg/kg)				Lab ID:	Date Sampled:	1005H21-016A	1005H21-002A	1005D29-007A	1005D29-018A	1005H21-015A	1005H21-013A
Matrix:		Dilution Factor:		Matrix:		Soil 1					
Benzene	71-43-2	86,000	341,000			1.2 U	0.72 U	3.8	0.94 U	8.0	
Ethylbenzene	100-41-4	3,500,000	15,600,000			1.2 U	0.72 U	1.0 U	0.94 U	1.2 U	
m,p-Xylene	1330-20-7	630,000	2,160,000			1.2 U	0.72 U	2.7	0.94 U	1.2 U	
o-Xylene	1330-20-6	630,000	2,160,000			1.2 U	0.72 U	1.0 U	0.94 U	1.2 U	
Toluene	108-88-3	5,000,000	29,400,000			1.2 U	0.72 U	3.2	0.94 U	2.6	
PAHs (µg/kg)											
Aceanaphthalene	83-32-9	3,400,000	18,900,000			230 U	230 U	220 U	240 U	230 U	240 U
Acenaphthylene	208-96-3	1,700,000	9,430,000			230 U	230 U	1900	240 U	1100	240 U
Anthracene	120-12-7	17,000,000	94,300,000			330	230 U	2000	240 U	990	240 U
Benz(a)anthracene	56-55-3	15,000	3,010,000			1300	230 U	9900	240 U	5100	240 U
Benz(a)pyrene	50-32-8	1,500	301,000			1400	230 U	9300	240 U	4300	240 U
Benz(b)fluoranthene	205-99-2	15,000	3,010,000			2000	230 U	18000	240 U	11000	240 U
Benz(c,g,h,i)perylene	191-24-2	1,700,000	9,430,000			910	230 U	8300	240 U	4900	240 U
Benzol(k)fluoranthene	207-08-9	150,000	30,100,000			650	230 U	2400	240 U	1700	240 U
Chrysene	218-01-9	1,500,000	100,000,000			1200	230 U	10000	240 U	5000	240 U
Dibenz(a,h)anthracene	53-70-3	1,500	301,000			230 U	230 U	2000	240 U	230 U	240 U
Fluoranthene	206-44-0	2,300,000	12,600,000			2000	230 U	17000	240 U	11000	240 U
Fluorene	86-73-7	2,300,000	12,600,000			230 U	230 U	400	240 U	230 U	3000
Indeno(1,2,3-cd)pyrene	193-39-5	15,000	3,010,000			900	230 U	8800	240 U	4600	240 U
Naphthalene	91-20-3	140,000	484,000			230 U	230 U	460	240 U	330	240 U
Phenanthrene	85-01-8	1,700,000	9,430,000			1100	230 U	7800	240 U	3600	240 U
Pyrene	128-90-0	1,700,000	9,430,000			1800	230 U	16000	240 U	9700	240 U
Metals (mg/kg)											
Mercury	7439-97-6	5.6	24.9			0.619	0.110 U	0.330	0.114 U	0.192	
Arsenic	7440-38-2	39	435			13.7	13.5	10.7	14.1	15.1	0.121 U
Lead	7439-92-1	400	800			226	10.5	46.8	15.9	56.4	5.66 U
Notes:											20.1

mg/kg = milligrams per kilogram

µg/kg = micrograms per kilogram

PRG = Proposed Removal Goal

Residential Soil PRGs apply to surface soil at depths of 0 to 1 foot.

Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.

Shaded and bolded cell indicates compound concentration exceeds a PRG.

CASRN - Chemical Abstract Services Registry Number.

Unvalidated Data

Table 2
Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville, Alabama

Compound	CASRN	Residential Soil PRGs	Construction/Utility Soil PRGs	HG-RES-16-1-2 0.5-1.0'	HG-RES-17-1-2 3.5-4.0'	HG-RES-18-1-1 0.5-1.0'	HG-RES-18-1-2 3.5-4.0'	HG-RES-18-2-1 0.5-1.0'	HG-RES-18-2-2 3.5-4.0'
VOCs (µg/kg)				Lab ID: 1005H21-006A 05/18/10 Soil 1	Lab ID: 1005H21-007A 05/18/10 Soil 1	Lab ID: 1005H21-004A 05/18/10 Soil 1	Lab ID: 1005H21-021A 05/18/10 Soil 1	Lab ID: 1005H21-010A 05/18/10 Soil 1	Lab ID: 1005H21-009A 05/18/10 Soil 1
PAHs (mg/kg)									
Aceanaphthalene	83-32-9	3,400,000	18,900,000	240 U	240 U	2200 U	240 U	230 U	240 U
Ethylbenzene	71-43-2	86,000	341,000	0.89 U	1.2 U	1.0 U	0.85 U	1.7	0.61 U
m,p-Xylene	100-41-4	3,500,000	15,600,000	0.89 U	1.2 U	1.0 U	0.85 U	1.2 U	0.66 U
<i>o</i> -Xylene	1330-20-7	630,000	2,160,000	0.89 U	1.2 U	1.0 U	0.85 U	1.2 U	0.66 U
Toluene	1330-20-6	630,000	2,160,000	0.89 U	1.2 U	1.0 U	0.85 U	1.2 U	0.66 U
PAHs (mg/kg)		5,000,000	29,400,000						
Aceanaphthalene	208-96-8	3,400,000	9,430,000	240 U	240 U	9400	240 U	230 U	240 U
Anthracene	120-12-7	17,000,000	94,300,000	240 U	240 U	13000	240 U	230 U	240 U
Benz(a)anthracene	56-55-3	15,000	3010,000	240 U	240 U	61000	240 U	240 U	240 U
Benz(a)pyrene	50-32-8	1,500	301,000	240 U	240 U	51000	240 U	240 U	240 U
Benz(b)fluoranthene	205-99-2	15,000	301,000	240 U	240 U	110000	240 U	1300	240 U
Benz(g,h,i)perylene	191-24-2	1,700,000	9,430,000	240 U	240 U	59000	240 U	570	240 U
Benz(k)fluoranthene	207-08-9	150,000	30,100,000	240 U	240 U	20000	240 U	350	240 U
Chrysene	218-01-9	1,500,000	100,000,000	240 U	240 U	59000	240 U	740	240 U
Dibenz(a,h)anthracene	53-70-3	1,500	301,000	240 U	240 U	2200 U	240 U	230 U	240 U
Fluoranthene	206-44-0	2,300,000	12,600,000	240 U	240 U	130000	240 U	1300	240 U
Fluorene	86-73-7	2,300,000	12,600,000	240 U	240 U	2800	240 U	230 U	240 U
Indeno(1,2,3-cd)pyrene	193-39-5	15,000	3,010,000	240 U	240 U	57000	240 U	540	240 U
Naphthalene	91-20-3	140,000	484,000	240 U	240 U	2800	240 U	230 U	240 U
Phenanthrene	85-01-8	1,700,000	9,430,000	240 U	240 U	51000	240 U	710	240 U
Pyrene	129-00-0	1,700,000	9,430,000	240 U	240 U	100000	240 U	1200	240 U
Metals (mg/kg)									
Mercury	7439-97-6	5.6	24.9	0.120 U	0.118 U	2.84	0.120 U	0.755	0.119 U
Arsenic	7440-38-2	39	435	5.67 U	19.6	23.2	5.62 U	12.3	16.7
Lead	7439-92-1	400	800	12.8	54.0	514	13.1	487	9.55

Notes:

mg/kg = milligrams per kilogram

µg/kg = micrograms per kilogram

PRG = Proposed Removal Goal

Residential Soil PRGs apply to surface soil at depths of 0 to 1 foot.

Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.

Shaded and bolded cell indicates compound concentration exceeds a PRG.

CASRN - Chemical Abstract Services Registry Number

**Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP Site
Huntsville, Alabama**

Sample ID	HG-RES-24-1-1	HG-RES-24-1-2	HG-RES-24-1-2	HG-RES-24-2-2	HG-RES-25-1-1	HG-RES-25-1-2
Sample Depth:	0.5'-1.0'	3.5'-4.0'	0.5'-1.0'	3.5'-4.0'	0.5'-1.0'	3.5'-4.0'
Lab ID:	1005B49-011A	1005B49-027A	1005D29-019B	1005B49-014A	1005B49-016A	1005B49-004A
Date Sampled:	05/12/10	05/12/10	05/14/10	05/13/10	05/13/10	05/12/10
Matrix:	Soil	Soil	Soil	Soil	Soil	Soil
Dilution Factor:	1	1	1	1	1	1
Compound	CASRN	Residential Soil PRGs	Construction/Utility Soil PRGs			
VOCs (µg/Kg)						
Benzene	71-43-2	86,000 3,500,000	341,000 15,600,000	13 0.95 U	9.7 0.83 U	2.0 1.2 U
Ethylbenzene	100-41-4	630,000 630,000	2,160,000 2,160,000	0.95 U 0.95 U	2.0 0.83 U	1.2 U 1.2 U
m,p-Xylene	1330-20-7	630,000 5,000,000	2,160,000 29,400,000	2.9 2.6	1.7 1.7	3.5 0.87 U
o-Xylene	1330-20-6					
Toluene	108-88-3					
PAHs (µg/Kg)						
Acenaphthene	83-32-9	3,400,000	18,900,000	220 U	850	820
Acenaphthylene	203-96-8	1,700,000	9,430,000	1100	7800	1300
Anthracene		120-12-7	94,300,000	1100	4100	240 U
Benz(a)anthracene		17,000,000	3,010,000	4300	19000	23000
Benz(a)pyrene		15,000	3,010,000	4300	18000	26000
Benz(b)fluoranthene		1,500	3,010,000	8800	27000	35000
Benz(b)fluoranthene		15,000	3,010,000	8800	27000	35000
Benz(g,h)heptaphene		1,700,000	9,430,000	4300	15000	17000
Benz(k)fluoranthene		150,000	30,100,000	1100	2400	1700
Chrysene		1,500,000	100,000,000	4200	18000	21000
Dibenz(a,h)anthracene		1,500	301,000	1500	1000	5500
Fluoranthene		2,300,000	12,800,000	8000	46000	23000
Fluorene		86-73-7	12,800,000	260	3900	790
Indeno(1,2,3-cd)pyrene		15,000	3,010,000	3900	13000	16000
Naphthalene		140,000	484,000	570	2600	970
Phenanthrene		85-01-8	1,700,000	3400	41000	12000
Pyrene		129-00-0	1,700,000	7700	40000	23000
Metals (mg/Kg)						
Mercury	7439-97-6	5.6	24.9	0.256	1.11	1.02
Arsenic	7440-38-2	39	435	13.5	12.8	9.58
Lead	7439-92-1	400	800	80.1	110	14.2

mg/kg = milligrams per kilogram

PRG = Proposed Removal Goal

Residential Soil PBGs apply to surface soil at depths of 0 to 1 ft.

Construction/Utility Soil PBGs apply to soil at depths of 0 to 1 foot.

Shaded and bolded cell indicates compound concentration exceeds a BBC.

CASRN - Chemical Abstract Services Registry Number

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Unvalidated Data

Table 2
Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP Site
Huntsville, Alabama

Compound	CASRN	Residential Soil PRGs	Construction/Utility Soil PRGs	Sample ID	Sample Depth:	Lab ID:	Date Sampled:	Matrix:	Dilution Factor:	HG-RES-26-1-2	HG-RES-26-2-1	HG-RES-26-2-2	HG-RES-27-1-1	HG-RES-27-1-2	HG-RES-27-2-1
VOCs (ug/kg)					3.5-4.0'	1005B49-021A	05/13/10	Soil	0.5'-1.0'	1005F46-023A	05/17/10	3.5'-4.0'	0.5'-1.0'	3.5'-4.0'	3.5'-4.0'
Benzene	71-43-2	86,000	341,000					Soil	1						
Ethylbenzene	100-41-4	3,500,000	15,600,000					Soil	1						
m,p-Xylene	1330-20-7	630,000	2,160,000					Soil	1						
o-Xylene	1330-20-6	630,000	2,160,000					Soil	1						
Toluene	108-88-3	5,000,000	29,400,000					Soil	1						
PAHs (ug/kg)															
Aceanaphthalene	83-32-9	3,400,000	18,900,000												
Acenaphthylene	208-96-8	1,700,000	9,430,000												
Anthracene	120-12-7	17,000,000	94,300,000												
Benz(a)anthracene	56-55-3	15,000	3,010,000												
Benz(a)pyrene	50-32-8	1,500	301,000												
Benz(b)fluoranthene	205-99-2	15,000	3,010,000												
Benz(g,h,i)perylene	191-24-2	1,700,000	9,430,000												
Benz(k)fluoranthene	207-08-9	150,000	30,100,000												
Chrysene	218-01-9	1,500,000	100,000,000												
Dibenz(a,h)anthracene	53-70-3	1,500	301,000												
Fluoranthene	206-44-0	2,300,000	12,600,000												
Fluorene	86-73-7	2,300,000	12,600,000												
Indeno(1,2,3-cd)pyrene	193-39-5	15,000	3,010,000												
Naphthalene	91-20-3	140,000	484,000												
Phenanthrene	85-01-8	1,700,000	9,430,000												
Pyrene	123-90-0	1,700,000	9,430,000												
Metals (mg/kg)															
Mercury	7439-97-6	5.6	24.9							0.116 U	0.868	0.114 U	0.466	0.115 U	0.185
Arsenic	7440-38-2	39	435							8.55	14.1	24.0	17.9	14.1	11.6
Lead	7439-92-1	400	800							25.0	362	118	64.9	25.1	36.3
Notes:															207

mg/kg = milligrams per kilogram

ug/kg = micrograms per kilogram

PRG = Proposed Removal Goal

Residential Soil PRGs apply to surface soil at depths of 0 to 1 foot.

Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.

Shaded and bolded cell indicates compound concentration exceeds a PRG.

CASRN - Chemical Abstract Services Registry Number

Table 2
Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MCP Site
Huntsville, Alabama

Compound	VOCs (µg/Kg)	Residential Soil		Construction/Utility Soil PRGs	Dilution Factor:	Sample ID	Sample Depth:	Lab ID:	Date Sampled:	Matrix:	Dilution Factor:	Sample ID	Sample Depth:	Lab ID:	Date Sampled:	Matrix:	Dilution Factor:	Sample ID	Sample Depth:	Lab ID:	Date Sampled:	Matrix:	Dilution Factor:	Sample ID	Sample Depth:	Lab ID:	Date Sampled:	Matrix:	Dilution Factor:																			
		CASRN	PRGs																																													
Benzene	71-43-2	86,000	341,000	2.1	0.75 U	HG-RES-27-3-1	0.5'-1.0'	1005F46-014A	05/17/10	Soil	1	HG-RES-27-3-2	3.5'-4.0'	1005F46-015A	05/17/10	Soil	1	HG-RES-28-1-1	0.5'-1.0'	1005D29-006A	05/14/10	Soil	1	HG-RES-28-1-2	3.5'-4.0'	1005B49-014B	05/12/10	Soil	1	HG-RES-30-1-1	0.5'-1.0'	1005B49-022A	05/12/10	Soil	1	HG-RES-30-1-2	3.5'-4.0'	1005B49-019A	05/12/10	Soil	1							
Ethylbenzene	100-47-4	3,600,000	15,600,000	2.1	0.75 U																																											
m,p-Xylene	1330-20-7	630,000	2,160,000	1.5 U	0.75 U																																											
o-Xylene	1330-20-6	630,000	2,160,000	1.5 U	0.75 U																																											
Toluene	108-88-3	5,000,000	29,400,000	1.8	0.75 U																																											
PAHs (µg/Kg)																																																
Acenaphthene	83-32-9	3,400,000	18,900,000	230 U	230 U																																											
Acenaphthylene	208-96-8	1,700,000	9,430,000	480	230 U																																											
Anthracene	120-12-7	17,000,000	94,300,000	580	230 U																																											
Benz(a)anthracene	56-55-3	15,000	3,010,000	2100	230 U																																											
Benz(a)pyrene	50-32-8	1,500	301,000	2100	230 U																																											
Benz(b)fluoranthene	205-99-2	15,000	3,010,000	3700	230 U																																											
Benz(c,h)perylene	191-24-2	1,700,000	9,430,000	1900	230 U																																											
Benzof(k)fluoranthene	207-08-9	150,000	30,100,000	1000	230 U																																											
Chrysene	218-01-9	1,500,000	100,000,000	2300	230 U																																											
Dibenz(a,h)anthracene	53-70-3	1,500	301,000	450	230 U																																											
Fluoranthene	206-44-0	2,300,000	12,600,000	4200	230 U																																											
Fluorene	86-73-7	2,300,000	12,600,000	230 U	230 U																																											
Indeno(1,2,3-cd)pyrene	193-39-5	15,000	3,010,000	1800	230 U																																											
Naphthalene	91-20-3	140,000	484,000	490	230 U																																											
Phenanthrene	85-01-8	1,700,000	9,430,000	2500	230 U																																											
Pyrene	129-00-0	1,700,000	9,430,000	3700	230 U																																											
Metals (mg/Kg)																																																
Mercury	7439-97-6	5.6	24.9	1.07	0.115 U																																											
Arsenic	7440-38-2	39	435	16.3	0.109 U																																											
Lead	7439-92-1	400	800	26.4	447	18.2	15.8	26.9	15.9	5.61 U	19.1	17.8	26.0	67.4																																		

mg/kg = milligrams per kilogram
 PRG = Proposed Removal Goal
 Residential Soil PRGs apply to surface soil at depths of 0 to 1 foot.
 Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.
 Shaded and bolded cell indicates compound concentration exceeds a PRG.
 CASRN - Chemical Abstract Services Registry Number
 Notes:

mg/kg = milligrams per kilogram
 PRG = Proposed Removal Goal
 Residential Soil PRGs apply to surface soil at depths of 0 to 1 foot.
 Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.
 Shaded and bolded cell indicates compound concentration exceeds a PRG.
 CASRN - Chemical Abstract Services Registry Number

Unvalidated Data

Table 2
Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP Site
Huntsville, Alabama

Compound	Residential Soil PRGs	Construction/Utility Soil PRGs	Construction/Utility Dilution Factor:	Sample ID	Depth:	Lab ID:	Date Sampled:	Matrix:	Depth:	Lab ID:	Date Sampled:	Matrix:	Depth:	Lab ID:	Date Sampled:	Matrix:	Depth:	Lab ID:	Date Sampled:	Matrix:	Depth:
VOCs (ug/kg)	CASRN			HC-RES-31-1-1	0.5-1.0'	1005BA9-006A	05/12/10	Soil	1	HC-RES-32-1-1	0.5-1.0'	1005BA9-007A	05/12/10	Soil	1	HC-RES-32-1-2	3.5-4.0'	1005BA9-005A	05/12/10	Soil	1
Benzene	71-43-2	86,000	341,000		56						18		1700			1.7		3.5			HG-RES-33-2-2
Ethylbenzene	100-41-4	3,500,000	15,600,000		1.3 U						1.4 U		1100			0.96 U		0.96 U			3.5-4.0'
m,p-Xylene	1330-20-7	630,000	2,160,000		1.3 U						1.4 U		14000			0.96 U		0.96 U			0.5-1.0'
o-Xylene	1330-20-6	630,000	2,160,000		1.3 U						1.4 U		7700			0.96 U		0.96 U			0.5-1.0'
Toluene	108-88-3	5,000,000	29,400,000		1.3 U						7.1		4100			1.6		3.6			0.5-1.0'
PAHs (ug/kg)																					
Aceanaphthalene	83-32-9	3,400,000	18,900,000		1300 U						250 U		120000			220 U		210 U			230 U
Aceanaphthalene	208-96-8	1,700,000	9,430,000		3600						1600		120000			220 U		210 U			230 U
Anthracene	120-12-7	17,000,000	94,300,000		3500						1300		600000			220 U		210 U			230 U
Benz(a)anthracene	56-35-3	15,000	3,010,000		19000						5000		750000			630		210 U			230 U
Benz(a)pyrene	50-32-8	1,500	301,000		20000						5000		500000			620		210 U			230 U
Benz(b)fluoranthene	205-99-2	15,000	3,010,000		30000						8000		800000			850		210 U			230 U
Benz(g,h,i)perylene	191-24-2	1,700,000	9,430,000		30000						15000		3100000			450000		210 U			230 U
Benz(k)fluoranthene	207-08-9	150,000	30,100,000		7100						2000		200000			310		210 U			230 U
Chrysene	218-01-9	1,500,000	100,000,000		17000						4500		610000			670		210 U			230 U
Dibenz(a,h)anthracene	53-70-3	1,500	301,000		4500						1000		850000			220 U		210 U			230 U
Fluoranthene	206-44-0	2,300,000	12,600,000		26000						11000		2500000			1200		210 U			230 U
Fluorene	86-73-7	2,300,000	12,600,000		1300 U						320		360000			220 U		210 U			230 U
Indeno(1,2,3-cd)pyrene	193-39-5	15,000	3,010,000		14000						2900		420000			460		210 U			230 U
Naphthalene	91-20-3	140,000	484,000		2400						490		3800000			220 U		210 U			230 U
Phenanthrene	85-01-8	1,700,000	9,430,000		12000						3100		3500000			610		210 U			230 U
Pyrene	123-90-0	1,700,000	9,430,000		25000						9600		2000000			1200		210 U			230 U
Metals (mg/kg)																					
Mercury	7439-97-6	5.6	24.9		0.540						0.210		0.323			0.208		0.105 U			0.117 U
Arsenic	7440-38-2	39	435		23.7						6.23		28.6			4.78		9.44			0.124
Lead	7439-92-4	400	800		53.5						54.9		57.3			174		46.5			13.2
Notes:																					36.8

mg/kg = milligrams per kilogram

ug/kg = micrograms per kilogram

PRG = Proposed Removal Goal

Residential Soil PRGs apply to surface soil at depths of 0 to 1 foot.

Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.

Shaded and bolded cell indicates compound concentration exceeds a PRG.

CASRN - Chemical Abstract Services Registry Number

Unvalidated Data

Table 2
Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP Site
Huntsville, Alabama

Compound		Residential Soil		Construction/Utility Soil PRGs									
VOCs (µg/Kg)	CASRN	PRGs	Soil	Dilution Factor:	1	HG-RES-36-1-1 1005F46-003A	05/17/10 Soil 1	HG-RES-36-2-1 1005F46-004A 05/17/10 Soil 1	05/17/10 Soil 1	HG-RES-36-2-2 1005F46-005A 05/17/10 Soil 1	HG-RES-39-1-1 1005F46-008A 05/17/10 Soil 1	HG-RES-39-1-2 1005F46-009A 05/17/10 Soil 1	TWP-1-1 0.5-1.0 05/31/10 Soil 1
Benzene	71-43-2	86,000	341,000	2.1		0.96 U	0.65 U	0.68 U	0.62 U	0.68 U	0.62 U	0.80 U	4.0
Ethylbenzene	100-41-4	3,500,000	15,600,000	0.85 U		0.96 U	0.65 U	0.68 U	0.62 U	0.68 U	0.62 U	0.80 U	1.0 U
m,p-Xylene	1330-20-7	6,300,000	2,160,000	0.85 U		0.96 U	0.65 U	0.68 U	0.62 U	0.68 U	0.62 U	0.80 U	1.0 U
o-Xylene	1330-20-6	6,300,000	2,160,000	0.85 U		0.96 U	0.65 U	0.68 U	0.62 U	0.68 U	0.62 U	0.80 U	1.0 U
Toluene	108-88-3	5,000,000	29,400,000	1.5		0.96 U	0.83	0.68 U	0.62 U	0.68 U	0.62 U	0.80 U	1.8
PAHs (µg/Kg)													
Aceanaphthalene	83-32-9	3,400,000	18,900,000	220 U		220 U	240 U	230 U	240 U	240 U	240 U	230 U	220 U
Acenaphthylene	208-96-8	1,700,000	9,430,000	220 U		220 U	240 U	230 U	240 U	240 U	240 U	230 U	2000
Anthracene	120-12-7	17,000,000	94,300,000	220 U		220 U	240 U	230 U	240 U	240 U	240 U	230 U	2400
Benz(a)anthracene	56-55-3	15,000	3,010,000	740		240 U	240 U	230 U	240 U	240 U	240 U	230 U	15000
Benz(a)pyrene	50-32-8	1,500	301,000	770		240 U	240 U	230 U	240 U	240 U	240 U	230 U	12000
Benz(b)fluoranthene	205-99-2	15,000	3,010,000	1160		240 U	240 U	230 U	240 U	240 U	240 U	230 U	23000
Benzog(h,i)perylene	191-24-2	1,700,000	9,430,000	750		240 U	240 U	230 U	240 U	240 U	240 U	230 U	10000
Benz(k)fluoranthene	207-08-9	150,000	30,100,000	390		240 U	240 U	230 U	240 U	240 U	240 U	230 U	2400
Chrysene	218-01-9	1,500,000	100,000,000	820		240 U	240 U	230 U	240 U	240 U	240 U	230 U	14000
Dibenz(a,h)anthracene	53-70-3	1,500	301,000	220 U		240 U	240 U	230 U	240 U	240 U	240 U	230 U	2600
Fluoranthene	206-44-0	2,300,000	12,600,000	1500		240 U	240 U	230 U	240 U	240 U	240 U	230 U	25000
Fluorene	86-73-7	2,300,000	12,600,000	220 U		240 U	240 U	230 U	240 U	240 U	240 U	230 U	460
Indeno(1,2,3-cd)pyrene	193-39-5	15,000	3,010,000	630		240 U	240 U	230 U	240 U	240 U	240 U	230 U	9900
Naphthalene	91-20-3	140,000	484,000	220 U		240 U	240 U	230 U	240 U	240 U	240 U	230 U	520
Phenanthrene	85-01-8	1,700,000	9,430,000	580		240 U	240 U	230 U	240 U	240 U	240 U	230 U	11000
Pyrene	128-90-0	1,700,000	9,430,000	1400		240 U	240 U	230 U	240 U	240 U	240 U	230 U	23000
Metals (mg/Kg)													
Mercury	7439-97-6	5.6	24.9	0.123		0.117 U	0.129	0.117 U	0.129	0.117 U	0.110 U	0.114 U	1.09
Arsenic	7440-38-2	39	435	8.68		11.8	5.45	15.9	6.58	15.9	6.58	24.6	17.7
Lead	7439-92-1	400	800	42.0		25.0	197	62.5	12.9	62.5	12.9	73.3	83.6

Notes:
 mg/kg = milligrams per kilogram
 µg/kg = micrograms per kilogram
 PRG = Proposed Removal Goal
 Residential Soil PRGs apply to surface soil at depths of 0 to 1 foot.
 Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.
 Shaded and bolded cell indicates compound concentration exceeds a PRG.
 CASRN - Chemical Abstract Services Registry Number

Residential Surface Soil PRGs apply to surface soil at depths of 0 to 1 foot.
 Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.
 Shaded and bolded cell indicates compound concentration exceeds a PRG.

Unvalidated Data

Table 2
Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP Site
Huntsville, Alabama

Sample ID		TWP-1-2 3.5-4.0'	HG-RES-41-SW 0.0-0.5'	HG-RES-42-SW 0.0-0.5'	HG-RES-43-SW 0.0-0.5'	HR-RES-41 0.0-0.5'	HR-RES-42 0.0-0.5'	HR-RES-43 0.0-0.5'
Sample Depth:	1005B49-015A 05/13/10 Soil	Lab ID:	1005H21-029A 05/20/10 Soil	Matrix:	1005H21-008A 05/20/10 Soil	Lab ID:	1005B49-001A 05/11/10 Soil	Matrix:
Compound	CASRN	Residential Soil PRGs	Construction/Utility Soil PRGs	Dilution Factor:	1	1	1	1
VOCs (µg/Kg)								
Benzene	71-43-2	86,000	341,000	2.1	6.9	0.87 U	1.4	1.5
Ethylbenzene	100-41-4	3,500,000	15,600,000	0.98 U	0.88 U	0.87 U	0.75 U	1.0
m,p-Xylene	1330-20-7	630,000	2,160,000	0.98 U	0.88 U	0.87 U	0.74 U	0.69 U
o-Xylene	1330-20-6	630,000	2,160,000	0.98 U	0.88 U	0.87 U	0.74 U	0.69 U
Toluene	108-88-3	5,000,000	29,400,000	0.98 U	1.6	0.87 U	0.81 U	2.0
PAHs (µg/Kg)								
Acenaphthene	83-32-9	3,400,000	18,900,000	260 U	560	270 U	280 U	240 U
Acenaphthylene	208-96-8	1,700,000	9,430,000	260 U	2400	270 U	280 U	240 U
Anthracene	120-12-7	17,000,000	94,300,000	260 U	2500	270 U	280 U	240 U
Benz(a)anthracene	56-55-3	15,000	3,010,000	760	11000	270 U	280 U	240 U
Benz(a)pyrene	50-32-8	1,500	301,000	630	9100	270 U	280 U	240 U
Benz(b)fluoranthene	205-99-2	15,000	3,010,000	1200	9100	270 U	280 U	240 U
Benz(g,h)perylene	191-24-2	1,700,000	9,430,000	590	4500	270 U	280 U	240 U
Benz(k)fluoranthene	207-08-9	150,000	30,100,000	330	2200	270 U	280 U	240 U
Chrysene	218-01-9	1,500,000	100,000,000	740	10000	270 U	280 U	240 U
Dibenz(a,h)anthracene	53-70-3	1,500	301,000	260 U	240 U	270 U	280 U	240 U
Fluoranthene	206-44-0	2,300,000	12,600,000	1500	19000	270 U	280 U	240 U
Fluorene	86-73-7	2,300,000	12,600,000	260 U	780	270 U	280 U	240 U
Indeno(1,2,3-cd)pyrene	193-39-5	15,000	3,010,000	560	4300	270 U	280 U	240 U
Naphthalene	91-20-3	140,000	484,000	260 U	970	270 U	280 U	240 U
Phenanthrene	85-01-8	1,700,000	9,430,000	670	8100	270 U	280 U	240 U
Pyrene	129-00-0	1,700,000	9,430,000	1300	17000	270 U	280 U	240 U
Metals (mg/Kg)								
Mercury	7439-97-6	5.6	24.9	0.125 U	0.120	0.138 U	0.120 U	240 U
Arsenic	7440-38-2	39	435	13.6	19.8	19.1	27.0	0.119 U
Lead	7439-92-1	400	800	26.1	71.7	27.7	51.5	31.5
Notes:								

mg/kg = milligrams per kilogram

µg/Kg = micrograms per kilogram

PRG = Proposed Removal Goal

Residential Soil PRGs apply to surface soil at depths of 0 to 1 foot.

Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.

Shaded and bolded cell indicates compound concentration exceeds a PRG.

CASRN - Chemical Abstract Services Registry Number

Unvalidated Data

Table 2
Surface Soil and Shallow Subsurface Soil Laboratory Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP Site
Huntsville, Alabama

Compound	Sample ID CASRN	Residential Soil		Construction/Utility Soil PRGs	Dilution Factor: 1	Sample ID SED-4-SWALE 0.0-0.5	Lab ID: 1005H21-019A 05/20/10	Matrix: Soil	Sample Depth: 0.0-0.5'	SED-5-SWALE 0.0-0.5' 1005H21-024A 05/20/10	
		VOCs (µg/kg)	PRGs								
Benzene	71-43-2	86,000	341,000			3.9			1.3		
Ethylbenzene	100-41-4	3,500,000	15,600,000			1.2 U			1.0 U		
m,p-Xylene	1330-20-7	630,000	2,160,000			1.2 U			1.7		
o-Xylene	1330-20-6	630,000	2,160,000			1.2 U			1.0 U		
Toluene	108-88-3	5,000,000	29,400,000			4.9			2.9		
PAHs (µg/kg)											
Aceanaphthalene	83-32-9	3,400,000	18,900,000			270 U			260 U		
Acenaphthylene	208-96-8	1,700,000	9,430,000			270 U			260 U		
Anthracene	120-12-7	17,000,000	94,300,000			280			260 U		
Benz(a)anthracene	56-55-3	15,000	3,010,000			1500			270		
Benz(a)pyrene	50-32-8	1,500	301,000			1500			260		
Benz(b)fluoranthene	205-99-2	15,000	3,010,000			1500			260		
Benz(g,h,i)perylene	191-24-2	1,700,000	9,430,000			2800			510		
Benz(k)fluoranthene	207-08-9	150,000	30,100,000			1100			260 U		
Chrysene	218-01-9	1,500,000	100,000,000			710			260 U		
Dibenz(a,h)anthracene	53-70-3	1,500	301,000			1900			360		
Fluoranthene	206-44-0	2,300,000	12,600,000			270 U			260 U		
Fluorene	86-73-7	2,300,000	12,600,000			3200			750		
Indeno(1,2,3-cd)pyrene	193-39-5	15,000	3,010,000			270 U			260 U		
Naphthalene	91-20-3	140,000	484,000			1100			260 U		
Phenanthrene	85-01-8	1,700,000	9,430,000			270 U			280		
Pyrene	129-00-0	1,700,000	9,430,000			1500			2700		
Metals (mg/kg)											
Mercury	7439-97-6	5.6	24.9			0.145			0.126 U		
Arsenic	7440-38-2	39	435			13.2			29.2		
Lead	7439-92-1	400	800			297			83.0		

Notes:

mg/kg = milligrams per kilogram

µg/kg = micrograms per kilogram

PRG = Proposed Removal Goal

Residential Soil PRGs apply to surface soil at depths of 0 to 1 foot.

Construction/Utility Soil PRGs apply to soil at depths of 1 to 4 feet.

Shaded and bolded cell indicates compound concentration exceeds a PRG.

CASRN - Chemical Abstract Services Registry Number

Table 3
Subsurface Soil Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP
Huntsville, Alabama

Sample ID	HC-RES-15-1-3	HC-RES-29-1-3	HC-RES-31-1-4	HC-RES-32-1-3	TWP-1-3	TWP-4-1	TWP-4-2
Sample Depth:	12.0-12.5	19.5-20.0	11.5-12.0	22.5-23.0	10.0-10.5	22.0-22.5	20.0-20.5
Lab ID:	1005J30-008B	1005J30-005A	1005J30-001A	1005J30-002A	1005J30-003A	1005J30-004A	1005J30-006A
Date Sampled:	05/14/10	05/13/10	05/12/10	05/12/10	05/13/10	05/13/10	05/13/10
Matrix:	Soil	Soil	Soil	Soil	Soil	Soil	Soil
Dilution Factor:	1	1	1	1	1	1	1
Units:	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg
Compound	CASRN						
VOCs (µg/kg)							
Benzene	71-43-2	0.72 U	150000	1700	8.9	0.66 U	5900
Ethylbenzene	100-41-4	0.72 U	9600	20	0.66 U	0.69 U	0.69 U
m,p-Xylene	1330-20-7	0.72 U	67000	64	0.66 U	3300	0.69 U
o-Xylene	1330-20-6	0.72 U	29000	28	0.66 U	1200	0.69 U
Toluene	108-88-3	0.72 U	130000	17	0.66 U	2300	0.69 U
PAHs (µg/kg)							
Acenaphthene	83-32-9	260 U	1700	360	240 U	4300 U	250 U
Acenaphthylene	208-96-8	260 U	1800	3600	240 U	1800	250 U
Anthracene	120-12-7	260 U	11000	79000	810	240 U	12000
Benz(a)anthracene	56-55-3	260 U	11000	64000	880	240 U	8600
Benz(a)pyrene	50-32-8	260 U	6500	57000	640	240 U	6800
Benz(b)fluoranthene	205-99-2	260 U	4300	43000	900	240 U	6600
Benz(g,h,i)perylene	191-24-2	260 U	3800	32000	370	240 U	3300
Benz(k)fluoranthene	207-08-9	260 U	5900	39000	320 U	240 U	1800
Chrysene	218-01-9	260 U	9600	57000	740	240 U	8000
Dibenz(a,h)anthracene	53-70-3	260 U	250 U	23000 U	320 U	240 U	260 U
Fluoranthene	206-44-0	260 U	28000	200000	2200	240 U	21000
Fluorene	86-73-7	260 U	6000	76000	660	240 U	9000
Indeno[1,2,3-cd]pyrene	193-39-5	260 U	3200	27000	360	240 U	2700
Naphthalene	91-20-3	260 U	28000	910000	1700	240 U	170000
Phenanthrene	85-01-8	260 U	72000	320000	2600	240 U	66000
Pyrene	129-00-0	260 U	37000	160000	1700	240 U	28000
Metals (mg/kg)							
Mercury	7439-77-6	0.127 U	0.121 U	0.289	0.161 U	0.125 U	0.124 U
Arsenic	7440-38-2	17.1	11.8	9.96	10.5	6.89	8.31
Lead	7439-92-1	6.69	53.0	68.7	10.3	8.62	11.1

Notes:

mg/kg = milligrams per kilogram

µg/kg = micrograms per kilogram

CASRN - Chemical Abstract Services Registry Number

Table 4
Sediment Analytical Results
Removal Action Work Plan Investigations
Huntsville Former MGP
Huntsville, Alabama

Compound	CASRN	Effects Value	Screening Value	PC-SED-3		
				PC-SED-1	0.0-0.5'	0.0-0.5'
				Lab ID:	1005H21-026A	1005H21-027A
				Date Sampled:	05/19/10	05/19/10
VOCs (µg/Kg)	PAHs (µg/Kg)	Matrix:	Dilution Factor:	Soil	Soil	Soil
Benzene	71-43-2	NS	NS	1.8	1.1	1.6
Ethylbenzene	100-41-4	NS	NS	1.1 U	0.60 U	0.85 U
m,p-Xylene	1330-20-7	NS	NS	1.1 U	0.60 U	2.0
o-Xylene	1330-20-6	NS	NS	1.1 U	0.60 U	0.85 U
Toluene	108-88-3	NS	NS	1.9	2.1	2.8
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Acenaphthene	83-32-9	6,710	330,000	300 U	260 U	250 U
Acenaphthylene	208-96-8	5,370	330,000	310	260 U	250 U
Anthracene	120-12-7	46,900	330,000	300 U	260 U	250 U
Benz(a)anthracene	56-55-3	74,800	330,000	2,100	280	250 U
Benz(a)pyrene	50-32-8	88,800	330,000	1600	260 U	250 U
Benz(b)fluoranthene	205-99-2	NS	330,000	2500	470	250 U
Benz(g,h,i)perylene	191-24-2	NS	330,000	960	260 U	250 U
Benz(k)fluoranthene	207-03-9	NS	330,000	660	260 U	250 U
Chrysene	218-01-9	108,000	330,000	2000	340	250 U
Dibenz(a,l)anthracene	53-70-3	6,220	330,000	300 U	260 U	250 U
Fluoranthene	206-44-0	11,3000	330,000	3100	600	300
Fluorene	86-73-7	NS	330,000	300 U	260 U	250 U
Indeno(1,2,3-cd)pyrene	193-39-5	NS	330,000	930	260 U	250 U
Naphthalene	91-20-3	34,600	330,000	300 U	260 U	250 U
Phenanthrene	85-01-8	86,700	330,000	860	260 U	250 U
Pyrene	129-00-0	153,000	330,000	2900	490	250 U
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Metals (mg/Kg)	Mercury	0.13	0.13	0.150 U	0.127 U	0.125 U
Arsenic	7440-38-2	7.24	7.24	18.9	19.1	15.2
Lead	7439-92-1	30.2	30.2	43.6	28.7	26.4

Notes:

$\text{mg/kg} = \text{milligrams per kilogram}$

ASBN - Chemical Abstract Services Society

Region 4 Sediment Effects Value or Sediment Screening Value

Regional Sediment Effects Value of Sediment Screening Value

CASRN - Chemical Abstract Services Registry Number

;ASSRN - Chemical Abstract Services Registry Number

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Table 5
 Temporary Monitoring Well Groundwater Analytical Results
 Removal Action Work Plan Investigations
 Huntsville Former MGP
 Homes
 Huntsville, Alabama

Unvalidated Data

Sample ID Lab ID: Date Sampled: Matrix: Dilution Factor: Units:	TWP-1 1005F46-016A 05/17/10 Water 1 µg/L	TWP-2 1005F46-017A 05/17/10 Water 1 µg/L	TWP-3 1005F46-018A 05/17/10 Water 1 µg/L	TWP-4 1005F46-019A 05/17/10 Water 1 µg/L
Compound				
VOCs (µg/L)	CASRN			
Benzene	71-43-2	4300	40000	150
Ethylbenzene	100-41-4	250	470	18
m,p-Xylene	1330-20-7	230	2400	240
o-Xylene	1330-20-6	58	1100	65
Toluene	108-88-3	230	11000	20
PAHs (µg/L)				
Acenaphthene	83-32-9	15	21	8.7
Acenaphthylene	208-96-8	6.0	38	100 U
Anthracene	120-12-7	3.3	11	6.1
Benz(a)anthracene	56-55-3	0.25	2.2	1.5
Benzo(a)pyrene	50-32-8	0.18	1.6	1.1
Benzo(b)fluoranthene	205-99-2	0.15	1.3	1.3
Benzo(g,h,i)perylene	191-24-2	0.14	0.76	0.51
Benzo(k)fluoranthene	207-08-9	0.080	0.55	0.43
Chrysene	218-01-9	0.19	1.6	1.2
Dibenz(a,h)anthracene	53-70-3	0.10 U	0.10 U	0.10 U
Fluoranthene	206-44-0	1.8	8.4	5.1
Fluorene	86-73-7	10	39	23
Indeno(1,2,3-cd)pyrene	193-39-5	0.090	0.61	0.47
Naphthalene	91-20-3	860	11000	960
Phenanthrene	85-01-8	17	65	21
Pyrene	129-00-0	2.4	9.5	3.9
Metals (µg/L)				
Mercury	7439-97-6	0.00020 U	0.00020 U	0.00020 U
Arsenic	7440-38-2	5.00 U	5.00 U	5.00 U
Lead	7439-92-1	5.45	3.94	16.6

Notes:

µg/L - micrograms per liter

CASRN - Chemical Abstract Services Registry Number