



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

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MEMORANDUM

SUBJECT: Submittal of Five-Year Review for the DuPont/Todtz Site

FROM: Nancy J. Swyers, P.E. / *Nancy Swyers*
Iowa/Nebraska Branch

TO: Michael J. Sanderson, Director
Superfund Division

THRU: Glenn Curtis, Chief *Glenn Curtis*
Iowa/Nebraska Branch

Attached is the Five-Year Report for the DuPont/Todtz site. This report concludes that the remedy selected at the time of the Record of Decision (ROD) is still protective of human health and the environment. Therefore, we recommend your approval of this report.

However, we do recommend that the semiannual monitoring conducted to date continue on the same schedule. According to the current provisions of the ROD and Consent Decree (CD), semiannual monitoring would revert to annual monitoring next year.

If you have any questions concerning this Five-Year Review Report, please feel free to contact me at x7703.

Attachment



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SUPERFUND RECORDS

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Swyers *Braeckle* Curtis

9/28/95 *9-29-95*

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FIVE-YEAR REVIEW

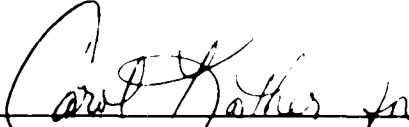
**DUPONT/TODTZ SITE
CAMANCHE, IOWA**

Prepared by:

U.S. Environmental Protection Agency

Region 7

Kansas City, Kansas



Michael J. Sanderson
Superfund Division Director

9/29/95
Date

TABLE OF CONTENTS

<u>SECTION</u>	<u>TITLE</u>	<u>PAGE</u>
1.0	INTRODUCTION	
2.0	SITE BACKGROUND	
2.1	Site Location and History	
2.2	Community Relations Activities	
2.3	Site Characteristics	
2.4	Site Risks	
3.0	REMEDIAL ACTION OBJECTIVES	
4.0	SUMMARY OF RESPONSE ACTIONS	
4.1	Non-Contingent Remedial Construction Activities	
4.2	Post-Construction Activities	
4.2.1	Groundwater Monitoring Program Requirements	
4.2.2	Contingent Further Remedial Action Requirements	
4.3	Groundwater Monitoring Results	
4.4	Further Actions	
5.0	ARARS REVIEW	
5.1	Background	
5.2	New Laws Since the ROD	
5.3	Analysis of the Four Compounds Specified in the ROD	
6.0	SUMMARY OF SITE VISITS	
7.0	AREAS OF NON-COMPLIANCE	
8.0	STATEMENT OF PROTECTIVENESS	
8.1	DuPont and EPA Data	
8.2	University of Iowa Hygienics Laboratory Data	
9.0	RECOMMENDATIONS	
10.0	NEXT REVIEW	
	FIGURES	
	TABLES	
	APPENDIX	

1.0 INTRODUCTION

This report documents the five-year review conducted by the U.S. Environmental Protection Agency (EPA) at the DuPont/Todtz Site in Camanche, Iowa, to determine if the remedial response actions at that site remain protective of human health, welfare, and the environment. Section 121^o of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, and Section 300.430(f)(4)(ii) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) require that periodic (at least once every five years) reviews be conducted for sites where hazardous substances, pollutants, or contaminants remain at the site above levels that allow for unlimited use or unrestricted exposure following the completion of all remedial actions for the site. The purpose of these reviews is to determine the continued adequacy of the implemented remedial actions in providing protection of human health, welfare, and the environment.

The five-year review is to be conducted by the lead agency, which is the EPA at the DuPont/Todtz Site. In general, five-year reviews are to be started within four to five years of the initiation of site cleanup.

The EPA has established three levels of review. Level III requires the most in-depth review and would be appropriate for sites where there is the greatest likelihood that the remedial actions implemented for the site are no longer protective. Level II is a less intensive review, and Level I is appropriate for sites where it is least likely that the remedial actions are no longer protective. This review of the DuPont/Todtz Site is a Level I review because it is unlikely that the response actions implemented at the site are no longer protective of human health, welfare, and the environment.

2.0 SITE BACKGROUND

2.1 Site Location and History

The 12 acre site is a former gravel pit that is located on the 120 acre Todtz family farm. The site is located approximately 1 1/4 miles from the City of Camanche, Iowa. Camanche is located along the Mississippi River about 2 miles south of Clinton, Iowa. Refer to Figures 1-1 and 1-2 for site location maps.

From approximately 1958-1975, the 12 acre site was used by the City of Camanche for disposal of their municipal refuse. In the early 1970s, E.I. DuPont de Nemours and Co., Inc. (DuPont) constructed an unlined 2.6 acre impoundment in the northwest

corner of the site for disposal of waste from their cellophane manufacturing plant in Clinton, Iowa. An estimated 4,300 tons of wet end cellophane process wastes from the Clinton plant were subsequently disposed of in the DuPont impoundment from 1971 until its closure in 1975.

The site was identified as a potential uncontrolled hazardous waste site in 1979 and added to the final National Priorities List (NPL) in June 1986.

On April 4, 1988, a CERCLA 104/122 Consent Order was signed by both EPA and DuPont which finalized the agreement for DuPont to conduct a Remedial Investigation/Feasibility Study (RI/FS), which focused on their impoundment. As a result of the RI/FS, EPA signed a Record of Decision (ROD) on November 5, 1988. The remedy specified in the ROD includes a 2-foot soil cover over the impoundment, a fence around the impoundment, deed restrictions, installation of the Bark residence drinking water well in the deeper bedrock aquifer, an expanded groundwater monitoring system, and further remedial actions which will be required if action levels of target compounds are exceeded.

DuPont conducted the Remedial Design/Remedial Action (RD/RA) required by the ROD pursuant to a Consent Decree (CD) which was signed by EPA and DuPont on September 28, 1989 and lodged by the Department of Justice (DOJ) on December 28, 1989. After the public comment period, the CD was entered by the Judge on November 6, 1990.

2.2 Community Relations Activities

This site is located within a mile of the Chemplex Site, which is another Superfund site, and Arcadian (formerly Hawkeye Chemical), a fertilizer plant. There are also numerous industries and resulting pollution from these industries in the nearby Cities of Clinton and Camanche. As a result of public concern for the two Superfund sites and industrial pollution, several environmental groups including the Coalition Against Pollution (CAP) and Ducks Unlimited organized in the area.

A community relations plan was prepared by EPA during the RI/FS. As part of the ROD process, the public was given an opportunity to comment on EPA's preferred remedy in the Proposed Plan and to request a public meeting. The public did not request a public meeting or comment on the proposed remedy.

The public, including environmental groups, became very active in environmental issues during the public comment period for the CD which commenced on December 28, 1989 and ended on February 28, 1990. Three public meetings were held during this time to discuss this site and other environmental issues in the community. The United States received fourteen comment letters

regarding the proposed CD. The comments were addressed prior to the entry of the CD.

An EPA Fact Sheet was issued to concerned citizens, environmental groups, and the media prior to commencement of construction of the soil cover and groundwater monitoring system.

2.3 Site Characteristics

The upper groundwater aquifer at the site generally flows in a southeast direction with the majority of the groundwater recharge occurring upgradient of the site. The impoundment wastes are periodically in direct contact with the groundwater. The bedrock aquifer is separated from the upper aquifer by a thick sequence of low permeable clays and silts that appear to behave as an aquitard.

Sampling and analysis of soil and shallow groundwater conducted prior to and during the RI/FS concluded that concentrations of carbon disulfide, toluene, tetrahydrofuran (THF), arsenic, lead and benzene were present in the impoundment above background concentrations. The location of monitoring wells is as indicated on Figure 1-3. The maximum concentrations identified in the groundwater in the vicinity of the berm area immediately downgradient of the Dupont impoundment (in monitoring wells now referred to as DU-08-S, DU-09-S, and DU-10-S) prior to initiation of the remedial action (RI/FS, 1988), are as follows: Concentrations are reported in ug/l or ppb.

- carbon disulfide	4,250
- toluene	8,400
- THF	95,500
- arsenic	1,600
- lead	400
- benzene	209

Except for arsenic and benzene, these compounds are among those reported by DuPont as being used at the Clinton cellophane plant and were disposed in the DuPont impoundment.

In the monitoring wells located in the hydraulically downgradient south and southeastern direction from the impoundment berm and the municipal landfill (in monitoring wells DU-02-S, DU-03-S, DU-04-S, DU-05-S, DU-06-S, and DU-07-S), the groundwater concentrations of organic and inorganic compounds have in general been slightly above background but not above health-based levels. The exception is the groundwater from piezometer PZ-03 (PZ-03 was replaced by monitoring well DU-02-S during the Remedial Action) which contained concentrations of arsenic at approximately 80 and 60 ug/l in March of 1988 which exceeds the Maximum Contaminant Level (MCL) for arsenic of 50 ug/l.

2.4 Site Risks

The Endangerment Assessment (EA) is included in the RI report and presents an evaluation of the existing and potential future impacts of contamination at the DuPont impoundment on human health and the environment. One of the major objectives of the assessment was to assist in identification of the principal routes of human and environmental exposure to site contaminants in order to focus the FS on remedial alternatives that would most effectively prevent or preclude adverse impacts.

The following conclusions were reached based on the exposure scenarios evaluated in the EA.

1. Risks to human health or the environment associated with direct contact and ingestion of surface soils or surface water downgradient of the impoundment appear to be below those used by EPA in determining whether human health or the environment are protected.
2. There would be an unacceptable risk to human health or the environment through ingestion of ground water within the impoundment and at the impoundment berm.
3. Risks to human health or the environment through ingestion or direct contact with ground water from the shallow aquifer at or near the southern or southeastern boundaries of the Site perimeter, which is several hundred feet downgradient from the DuPont impoundment, appear to be below those used by EPA in determining whether human health or the environment are protected. Concentrations of 60 and 80 ug/l of arsenic have been detected at PZ-03 on the eastern boundary of the landfill. These concentrations exceed the MCL of 50 ug/l. However, risks to human health or the environment in this portion of the Site would appear to be acceptable because the aquifer would not be considered a viable drinking water supply at this location.

The findings of the RI and the EA indicate that the DuPont impoundment is the source of contamination for the Site.

3.0 **REMEDIAL ACTION OBJECTIVES**

Based on the findings of the RI and EA, the following are the remedial action objectives established in the 1988 FS for the DuPont impoundment:

° Subsurface Soil and Waste

"Protect human health and the environment by preventing direct contact with and future releases of the contaminated subsurface soil and waste within the impoundment."

° Groundwater

"Protect human health and the environment by preventing direct contact with or ingestion of contaminated groundwater, minimizing further releases of groundwater contaminated with DuPont-related constituents at levels that present an unacceptable hazard to human health and the environment beyond the perimeter of the Todtz Farm Landfill."

Based on these objectives, the focus of the FS was on the development of cost-effective remedial actions for controlling the potential release of waste constituents from the impoundment.

Remedial alternatives were screened based on effectiveness, implementability, operation and maintenance efforts and costs, and capital costs. Excavation of the impoundment wastes and disposal at a RCRA landfill or treatment onsite using incineration, stabilization or in-situ treatment technologies were eliminated since they were not cost-effective based on the relatively low risk to public health and the environment and the large capital cost.

EPA evaluated four basic alternatives and two variations for remediation of the DuPont impoundment. These alternatives were 1) no action, 2) soil cover, 3) geomembrane multilayer cap, and 4) geomembrane-clay multilayer cap with bentonite slurry wall. The alternative selected includes the following major components:

- A 2-foot soil cover over the DuPont impoundment;
- Access restrictions which include deed limitations and site fencing;
- Site maintenance which includes mowing the vegetative cover and repairing the fence;
- A groundwater monitoring system which includes implementation of further remedial actions if certain chemical specific action levels are exceeded;
- Replacement of the Bark residence drinking water well in the deeper bedrock aquifer.

4.0 SUMMARY OF RESPONSE ACTIONS

4.1 Non-Contingent Remedial Construction Activities

At the request of the Bark residents, DuPont replaced their drinking water well prior to finalization of the CD. The well

was installed in September 1989 pursuant to a design that was approved by EPA.

DuPont commenced construction of the 2-foot soil cover and groundwater monitoring system in April 1991 and completed construction on July 29, 1991. The final inspection was conducted on July 31, 1991. Representatives of EPA and DuPont were present during the inspection.

4.2 Post-Construction Activities

In addition to the construction activities summarized in Section 4.1, the Remedial Action includes an extensive groundwater monitoring program to ensure protection of human health and the environment with chemical-specific action levels that trigger further remedial actions if any action levels are met or exceeded. Maintenance of the soil cover, fence, and monitoring well network is also required. DuPont is in the process of conducting these activities pursuant to the CD with EPA oversight.

4.2.1 Groundwater Monitoring Program Requirements

Monitoring of both the shallow and deep bedrock aquifer is required pursuant to the CD. The location of the monitoring wells is as indicated on Figure 1-3. The list of analytes is summarized on Table 4-2. The specific monitoring requirements are as follows:

The deep monitoring wells (including the James Bark residential well) are required to be sampled semiannually for two years following the completion of non-contingent remedial actions in July 1991. If no DuPont-impoundment related constituents are detected above background concentrations during this period, the wells were to be sampled every five years thereafter. Because no contaminants were detected in deep wells during the two years from July 1991 to April 1993, the deep wells are not required to be sampled again until April 1998.

All shallow monitoring wells are required to be sampled at least semiannually for the first five years and annually thereafter for thirty years. The need to continue monitoring beyond this point will be evaluated at that time and at the corresponding statutory five year review. Sampling of the shallow wells began in July 1991 and is continuing. According to the CD, the semiannual sampling will continue until April 1996. After that time frame, annual sampling will continue for thirty years.

4.2.2 Contingent Further Remedial Action Requirements

Further remedial actions will be triggered in the event that an Action Level concentration for one or more trigger compounds at specific shallow monitoring wells (specified in Table 4-3 and in Figure 1-3) is met or exceeded (which will be verified by statistical analysis). If any of the Table 1 Action Level concentrations are met or exceeded, further remediation of the impoundment will be performed. If any of the Table 2 Action Levels are met or exceeded, remediation of the groundwater will be performed. Once groundwater remediation is triggered, groundwater cleanup levels will consist of all applicable State or Federal cleanup standards for all DuPont-related constituents listed in Table 4-4. If the impoundment remediation has not been triggered at the time the Table 2 Action Level concentrations are met or exceeded, both the remediation of the impoundment and remediation of the groundwater will be performed at the same time.

Intermediate trigger levels were also established in the CD in order to provide a mechanism for conducting the planning and design functions prior to an Action Level exceedance. For example, if 50% of any Table 1 Action Level is met or exceeded, quarterly monitoring (as opposed to the required semiannual or annual monitoring) for that particular compound at the exceeded well will be conducted. If 80% of any Table 1 Action Level is met or exceeded, DuPont is required to submit a Treatment Evaluation Study (TES) to evaluate remedial options consisting of a slurry wall around the impoundment as compared to treatment remedies. After completion of the TES, EPA is to decide whether the remedy will be a slurry wall or a treatment remedy. The schedule in the CD provides for the pre-design of the selected remedy in order for it to be complete prior to a 100% Action Level exceedance.

4.3 Groundwater Monitoring Results

Groundwater monitoring pursuant to the CD has been conducted by DuPont with EPA oversight since July 1991. Monitoring was also conducted prior to 1991 during the RI/FS in 1988, and in 1989 and 1990. All of the analytical results from DuPont and EPA groundwater samples are included in the Appendix. Some exceedances of 50% and 80% of the THF Action Level have occurred in at least one trigger well and the discussion of these exceedances are as follows:

THF was detected at a concentration of 42 ppb in monitoring well DU-05-S during a routine semiannual groundwater sampling event conducted in April 1993. This value constituted an 80% exceedance of the Table 1 Action Level for THF which is 50 ppb. Pursuant to the CD, verification of the 80% exceedance is the next required step. The verification process consists of

obtaining quadruplicate samples from any wells that exceed 80% of a Table 1 Action Level. The samples are to be collected as soon as practicable after realizing that the previous event yielded data that exceeded any established trigger levels.

The 80% value of the 50 ppb THF Table 1 Action Level is 40 ppb, thus the April 1993 value of 42 ppb exceeded the 80% trigger level. DuPont conducted the 80% verification sampling in June 1993 and obtained the following quadruplicate results: 91 ppb; 93 ppb; 110 ppb; and 110 ppb. The average value of the quadruplicate data was 101 ppb. The June 1993 sampling data conclusively verified the 80% exceedance of the Table 1 Action Level for THF but also satisfied the 100% exceedance criteria. The 100% exceedance value is the actual trigger level which is 50 ppb, thus an average of quadruplicate samples yielding 101 ppb clearly surpasses the 100% exceedance but did not verify the 100% exceedance. After obtaining an initial exceedance of a different larger percentage exceedance, the verification process must be repeated in order to verify the new larger percentage of exceedance.

DuPont collected quadruplicate samples in August 1993 in order to verify the initial 100% exceedance of THF observed during the June 1993 event. As mentioned previously, the June 1993 event clearly verified the 80% exceedance but indicated that the exceedance might actually be in the 100% range. The DuPont quadruplicate THF results for the August 1993 sampling event consisted of the following: 48 ppb; 50 ppb; 51 ppb; and 51 ppb. The average value of the quadruplicate data was 50 ppb. The August 1993 sample results indicated that the initial 100% exceedance was verified and that an 80% THF exceedance was verified for a second time.

EPA split samples were obtained by a contractor during the August 1993 sampling event. The EPA samples were analyzed by the Region VII Laboratory and yielded the following THF results: 10 ppb; and 15 ppb. The average value for the two EPA split samples was 12.5 ppb. The EPA split samples did not confirm the 100% THF exceedance nor the initial 80% exceedance. The average EPA THF value of 12.5 ppb was substantially less than the average DuPont concentration of 50 ppb. The two data sets were statistically evaluated and it was determined that the two sets of values were statistically different, or not from the same population. The large data differences indicated that either the DuPont or EPA results were not valid. The incompatibility of the DuPont and EPA data for the August 1993 event, as well as the incompatibility of the DuPont data when compared to June 1993 DuPont results, clearly indicated that all data were erratic. The June 1993 DuPont data represented a two fold increase over the prior April and subsequent August 1993 results.

The erratic nature of the data, coupled with the fact that only one well (DU-05-S) was yielding elevated results, led to the decision to again collect EPA split samples during an upcoming routine semiannual sampling event in October 1993. Additionally, the observed exceedances occurred during the time period of the regional midwestern flooding events of 1993. A large portion of the DuPont/Todtz Site was flooded and certain wells, including monitoring well DU-05-S, were only accessible by boat. Since the site is located on terrace and floodplain deposits and is in close proximity to the Mississippi River, the wells in low lying areas had been constructed on artificial soil berms in order to avoid overtopping during a flood event. An additional factor in the decision to obtain more information by evaluating the October 1993 sampling event, included the position of the static water level in well DU-05-S. This was the only on-site monitoring well which had a water level that directly corresponded to the elevation of the surrounding ponded water. This fact indicates a more direct hydraulic relationship of this well to the shallow subsurface, which is in direct hydraulic communication with any ponded or surface water. This situation is most likely due to the position of the DU-05-S well screen being located at a very shallow depth. However, the shallow well screen depth would also be capable of more readily detecting any surface water influences since surface water has a direct affect on, and is in hydraulic communication with, shallow groundwater.

DuPont conducted a semiannual groundwater sampling event in October 1993 which included quadruplicate sampling at well DU-05-S. EPA personnel collected groundwater split samples which included a sample from monitoring well DU-05-S. The THF values for the quadruplicate DuPont samples and the EPA split sample for well DU-05-S were all at non-detect levels. The DuPont and EPA data for the October 1993 event, including the comparison of data from the other split samples from different wells, were in agreement. The October 1993 data indicated that there was no groundwater exceedance for any Action Level value mandated by the CD.

Pursuant to the CD, DuPont was required to sample DU-05-S on a quarterly basis for THF because there was an exceedance of at least 50%. The monitoring frequency for THF in that well will revert back to a semiannual basis only after four consecutive quarterly samples from that well indicate that no Table 1 compound is being found at 50% of the Table 1 Action Level concentrations.

During the January 1994 sampling event, THF was again non-detect in DU-05-S. However, in April 1994, THF was detected at concentrations of 34, 37, 38, and 42 ppb according to DuPont's results and at concentrations of 57 and 63 ppb according to EPA's results. These results indicated an 80% exceedance. However, when the verification sampling took place in June 1994, THF was

detected in DU-05-S at concentrations of 6.8, 8.1, 9.3, and 12 ppb according to DuPont's results and at concentrations of 14 and 15 ppb according to EPA's results. In October 1994, THF was not detected in DU-05-S according to DuPont's results and EPA's sample result of 31 ppb was probably cross-contaminated and should be considered unreliable. In January 1995, both DuPont's and EPA's results for THF in DU-05-S were non-detect. On April 25, 1995 another semiannual sampling event was conducted. Both EPA's and DuPont's results were again non-detect for THF. Since four consecutive quarterly samples from DU-05-S indicate that no Table 1 compound is being found at 50% of the Table 1 Action Level concentrations, the monitoring frequency for this well can revert to semiannually.

4.4 Further Actions

Due to the verified 80% exceedance of THF in monitoring well DU-05-S in June 1993, DuPont was required by the Consent Decree to provide a draft TES. The TES was submitted to EPA on September 22, 1993. EPA provided comments to DuPont dated October 22, 1993. DuPont submitted a revised TES on December 6, 1993. Since the elevated THF levels did not reoccur during the October 1993 and January 1994 sampling events, EPA halted the schedule that included finalization of the TES and predesign activities. However, when elevated levels of THF recurred in April 1994, EPA decided that these activities should resume. In a letter to DuPont dated October 21, 1994, EPA requested that DuPont submit a Draft Project Operations Plan for Pre-Design Study. In a letter to EPA dated December 2, 1994, DuPont agreed to submit the Draft Project Operations Plan. The Plan was submitted to EPA on April 12, 1995. EPA submitted comments on the plan to DuPont dated May 17, 1995. According to the schedule in the CD, DuPont will conduct the predesign but will not be required to conduct the design or implement the remedy until there is a verified 100% exceedance of a Table 1 Action Level.

5.0 ARARS REVIEW

5.1 Background

The Five Year Review includes a review of newly promulgated or modified requirements of Federal and State environmental laws. These new laws are evaluated to determine whether they are applicable or relevant and appropriate requirements (ARARs) and whether they call into question the protectiveness of the response action selected in the Record of Decision (ROD). The intent of the review is to evaluate whether the selected remedy remains protective of human health and the environment. Although ARARs are usually considered frozen as of the date of the ROD, if an evaluation in the light of the new laws concludes that the remedy is no longer protective of human health and the

environment, it would be necessary to change the remedy to meet the new ARAR standards. The NCP provides:

Requirements that are promulgated or modified after ROD signature must be attained (or waived) only when determined to be applicable or relevant and appropriate and necessary to ensure that the remedy is protective of human health and the environment. NCP 40 CFR § 300.430(f)(1)(ii)(B)(1).

In the DuPont/Todtzt Site ROD, the selected remedy included replacement of a residential drinking water well, an impoundment cover, monitoring, and two contingent operable units, one involving further impoundment containment and the other involving groundwater cleanup remediation. The two contingent operable units could be triggered by certain chemical concentration action levels of any of four designated trigger compounds found in monitoring well samples: arsenic, chromium VI, THF and carbon disulfide. The ROD also specified the cleanup levels to be attained for the four compounds in the event that groundwater remediation is ever implemented. Since the groundwater cleanup remediation has so far not been triggered and is not being implemented, it may seem premature to review cleanup levels which establish chemical concentrations at which groundwater extraction and treatment could be considered complete and terminated, if ever implemented. However, such numerical levels were defined in the DuPont/Todtzt Site ROD.

A Consent Decree was negotiated for the performance of the remedial action at the site. The Consent Decree established cleanup levels for other chemical constituents in addition to the four that had been specifically mentioned in the ROD. The Consent Decree did not freeze the cleanup levels but recognized that MCLs and other cleanup standards might change in the future and allowed for the changed standards to be used as future cleanup levels.

The Consent Decree established MCLs as the cleanup levels to be attained in the event groundwater remediation is triggered. The Consent Decree also provided "Settling Defendants shall extract ground water until such time when all applicable State or Federal cleanup standards are met for DuPont impoundment-related constituents as listed in Table 3. In the absence of any other applicable cleanup standards, the work shall achieve compliance with all primary Maximum Contaminant Levels (MCLs) established under the Safe Drinking Water Act. MCLs include the primary MCLs currently established at 40 C.F.R. Part 151, Subpart B and Part 143. The parties recognize that the MCLs established at the time of entry of this Decree may be changed in the future and that such future primary MCLs will constitute the clean up level." ROD, at pp. 12 & 13". The five year review does not need to revisit and conduct an ARAR analysis for the additional requirements in the Consent Decree. It is the remedy as stated

in the ROD which the five year review is required by statute and regulation to address.

5.2 New Laws Since the ROD

After the ROD was signed on November 4, 1988, the Iowa Environmental Protection Commission adopted "Rules for Determining Cleanup Actions and Responsible Parties" (Iowa Rules) (Iowa Admin. Code, Chapter 133) and the U.S. EPA adopted a number of new or modified Maximum Contaminant Levels (MCLs). These new laws are evaluated in relation to the remedy selected in the ROD in this ARARs section of the Five-Year Review.

On August 16, 1989, the Iowa Environmental Protection Commission adopted the Chapter 133 Iowa Rules which provide, in pertinent part, as follows:

Groundwater. The goal of groundwater cleanup is use of best available technology and best management practices as long as it reasonable and practical to remove all contaminants, and in any event until water contamination remains below the action level for any contaminant, and the department determines that the contamination is not likely to increase and no longer presents a significant risk. Where site conditions and available technology are such that attainment of these goals would be impractical, the department may establish an alternative cleanup level or levels, including such other conditions as will adequately protect the public health, safety, environment, and quality of life. Iowa Admin. Code §133.4(3)b.1.

The term "Action Level" is defined by the Iowa Rules as "the HAL, if one exists; if there is no HAL, then the NRL, if one exists; if there is no HAL or NRL, then the MCL...." A "HAL" is a "lifetime health advisory level for a contaminant, established by the United States Environmental Protection Agency...." A "NRL" is the "negligible risk level for carcinogens established by the EPA...." If there is no HAL, NRL, or MCL, an action level may be established by the department based on current technical literature and recommended guidelines of EPA and recognized experts, on a case-by-case basis. Iowa Admin. Code § 133.2.

The Iowa "Action Levels" and Iowa Rules should probably be considered ARARs particularly for the groundwater cleanup levels part of the remedy selected in the DuPont/Todtzt Site ROD. The Iowa "Action Levels" which are cleanup standards would probably not be considered ARARs for purposes of reevaluating the protectiveness of the DuPont/Todtzt Site trigger levels.

Also, after signature of the DuPont/Todtzt Site ROD, the EPA promulgated new or modified MCLs for a variety of contaminants. The MCL for total chromium changed; the MCL for arsenic remained the same. Generally, MCLs are considered ARARs in setting

cleanup standards for groundwater that is usable for human consumption. MCLs would probably not be considered ARARs for purposes of reevaluating the protectiveness of the DuPont/Todtz Site trigger levels.

The Table 3 list of DuPont impoundment-related constituents agreed upon by the parties to the Consent Decree is attached to this Five-Year Review Report as Table 4-4. Since its preparation for the Consent Decree in 1989, some of the values quoted in that table have changed. For example, the MCL for chromium is now 100 ppb instead of 50, the MCL for toluene is now 1,000 ppb instead of 2,000, and the MCL for barium is now 2,000 ppb instead of 1,000. Antimony now has a MCL of 6 ppb instead of a RfD of 14, beryllium now as a MCL of 4 ppb instead of a RfD of 175, nickel now has a MCL of 100 ppb instead of a RfD of 700, and lead now has an Action Level at the tap of 15 ppb instead of a MCL of 50.

The Consent Decree requires that MCLs promulgated or modified after ROD signature shall be attained as cleanup standards in the event that groundwater remediation is triggered. The Consent Decree Performance Standards also sets out an elaborate hierarchy of potential sources of cleanup levels in order to assure that some appropriate contemporary standard will be available in the future. The numeric concentration values will be determined by whatever of the identified standards are in effect at the time. This moots the need to update the Consent Decree cleanup standards by means of an ARAR analysis.

5.3 Analysis of the Four Compounds Specified in the ROD

Out of the four compounds, only arsenic had an established MCL at the time of the ROD. The DuPont/Todtz Site ROD considered the MCL an ARAR for determining completion of groundwater cleanup but not for setting action levels that would trigger the commencement of groundwater remediation, particularly in the causeway area of the site. In the event groundwater remediation is triggered, the arsenic MCL of 50 ug/l would be the cleanup level. ROD, at p. 20. The ROD determined that the arsenic MCL was not applicable or relevant and appropriate in setting the arsenic action levels for the causeway between the municipal landfill of the DuPont/Todtz Site and Murphy's Lake because the groundwater monitored there was not considered a viable water supply. The arsenic MCL is presently under review but it has not changed since the ROD. The MCL for arsenic remains at 50 ppb. The Iowa Rule set up a hierarchy of sources for establishing cleanup levels in the definition of "Action Level". The Iowa Rules would use a HAL or a NRL as a cleanup level before it would use an MCL. The HAL and the NRL for arsenic may be concentrations that are lower than the MCL of 50 ppb and consequently more protective. However, neither the statute nor the National Contingency Plan require that the EPA in its five-

year review, adopt a subsequently enacted ARAR that is the "more protective" or "most protective" as long as the original remedy is itself protective. The EPA considers MCLs, by definition, to be protective of human health and the environment. Since there has not been a change in MCL status, there is no reason to change the cleanup or trigger levels for arsenic.

For chromium (VI), at the time of the ROD there was no MCL specifically for chromium (VI) but there was an MCL of 50 ppb for total chromium which includes chromium (VI). The ROD used the total chromium MCL of 50 ppb both as the trigger level for chromium (VI) and as the chromium cleanup level. ROD, pp. 19 & 20. The Consent Decree stated that the cleanup level for chromium (VI) shall be the MCL. CD, p. 13. The Consent Decree Table 3, "DuPont impoundment related constituents to meet specified cleanup criteria upon completion of ground water operable unit remediation" lists simply "chromium" rather than chromium (VI) as the constituent to be cleaned up to the MCL which at the time was 50 ppb. So, in the Consent Decree, the trigger levels are stated in terms of chromium (VI) and the cleanup level is stated in terms of total chromium. An analytical level for total chromium includes both hexavalent and trivalent chromium. So the use of a total chromium level as a cleanup standard would assure that not only hexavalent chromium but also all types of chromium together are below the total chromium cleanup level.

Since the ROD, the MCL for total chromium has been increased from 50 ppb to 100 ppb. The protectiveness of a cleanup level which was 50 ppb at the time of the ROD is not called into question by an increase to the present MCL of 100 ppb. Consequently, there is no requirement to lower the ROD cleanup level or action level during the Five-Year Review in order to assure protectiveness of the remedy. The Consent Decree reaffirmed that the cleanup level would be the MCL and also allowed for future fluctuation of the value of the MCL such as the increase from 50 ppb to 100 ppb.

For carbon disulfide and THF, there have not been MCLs established. However, health based standards in groundwater of 3,500 and 700 ppb, respectively, were established for these compounds during the EA. The health based standards developed during the EA were based on ingestion of the reference doses (RfDs) for these compounds. The reference dose is defined as an estimate of a daily exposure to the human population that is unlikely to result in appreciable risk of deleterious effects during a lifetime. The trigger levels set by the ROD for THF varied from 50 ppb to 700 ppb, depending on the location of the monitoring well and the operable unit involved. The trigger levels set for carbon disulfide varied similarly from 250 ppb to 3,500.

For carbon disulfide and THF, there have still not been any MCLs established. The definition of "Action Level" in the Iowa rules includes not only MCLs but also "HALs" and "NRLs" as cleanup standards. However, the EPA has not established either a HAL or a NRL for either carbon disulfide or THF. The Iowa Rules would then revert to a case-by-case determination which is how the ROD and Consent Decree levels were set for these two compounds.

The health based levels established during the EA were based on the reference doses for these two compounds. The reference dose for carbon disulfide has not changed. The reference dose for THF is currently under review, but so far there has been no change in the reference dose. Since there have not been any laws, regulations or other ARARs promulgated that call into question the protectiveness of the remedy, there is no need to reduce the cleanup or action levels for carbon disulfide or THF.

6.0 SUMMARY OF SITE VISITS

Pursuant to the CD, DuPont is required to maintain the soil cover, fence and monitoring wells. Oversight and inspections of Potentially Responsible Parties (PRP)-lead site activities have been conducted by EPA or EPA contractors since DuPont took the lead on these activities during the 1988 RI/FS. Oversight was conducted during the Remedial Action and the final inspection in 1991. Since the completion of the Remedial Action, EPA and/or EPA contractors have conducted oversight and collected split samples from every sampling event and have inspected the integrity of the soil cover.

The last inspection and semiannual sampling event was conducted on April 25, 1995. Photographs were taken during the inspection and are included as an Appendix to this report. At that time, the soil cover was observed to be in good shape with an adequate vegetative cover. During the previous semiannual sampling event and inspection in October 1994, some slight erosion in several places around the fence area was observed. DuPont has repaired, reseeded and mulched these areas. DuPont also conducts drive-through inspections of the soil cover, fence, and monitoring wells on a monthly basis, thorough inspections on a semiannual basis and has the grass mowed about three times per year. EPA's observation during the April 25, 1995 inspection is that DuPont is meeting the terms of the CD in regard to all operation and maintenance activities. EPA plans to continue the inspections and collection of groundwater split samples in the future.

7.0 AREAS OF NON-COMPLIANCE

Based on this review, EPA finds that there are no areas of non-compliance.

8.0 STATEMENT OF PROTECTIVENESS

8.1 Monitoring conducted by DuPont and EPA

The discussion in Section 4.2 illustrates the erratic nature of the THF data for monitoring well DU-05-S. An evaluation of additional constituents of concern that have been detected at different monitoring wells during the course of the monitoring program also indicate a somewhat erratic nature of the data in most instances. Some clear trends are evident but the majority of the data has no clear pattern.

The most significant trend includes the continued elevated levels of arsenic and THF in the berm wells with increasing concentrations of both compounds in DU-08-S. These monitoring wells are installed in the actual bermed wall of the impoundment and thus indicate that constituents are migrating through the berm and are most likely present in the area of the municipal landfill. Monitoring wells were not installed in the actual municipal landfill area due to the obvious hazards associated with directly drilling through a landfill. However, the levels of constituents in the berm wells are significant and thus indicate that it would be a reasonable assumption that the municipal landfill contains constituents from the DuPont impoundment.

The trigger wells established in the CD are positioned hydraulically downgradient of the municipal landfill and are thus capable of detecting any releases from the DuPont impoundment that would migrate through the municipal landfill. Monitoring wells installed downgradient of the municipal landfill also include deep wells that are installed in the upper bedrock zone in order to detect any vertical migration of constituents and evaluate the effectiveness of the intervening clay unit. All bedrock wells have yielded non-detect data for all hazardous constituents of concern. The monitoring system envisioned and designated by the CD is currently evaluated as being fully capable of detecting any releases from the DuPont impoundment. The manner in which releases occur may prove to differ from the original assumptions of the CD.

The CD envisioned a typical migrating groundwater plume scenario in which levels of constituents would steadily increase in concentration over time. The different trigger levels, and values assigned to them, were intended to provide an early warning system for a migrating plume. The early warning system would then allow sufficient time for the design and implementation of a remedy prior to experiencing substantial off-site releases. The situation of ever increasing concentrations over time has been observed at the impoundment berm wells, as discussed above, with respect to arsenic. However, this

situation has not been observed at the trigger wells which are located downgradient of the municipal landfill. These wells have experienced erratic, relatively low levels of constituents of concern followed by non-detect data. All of the previous detections, with the exception of the recent THF value at well DU-05-S, have not exceeded a trigger value at a specified trigger well as mandated by the CD. The occasional low level detections of constituents at the trigger wells may be an indication that releases are periodically occurring due to some type of physical processes, may simply represent the leading edge of a migrating plume, or may continue to consist of infrequent low level releases that do not constitute a significant problem.

8.2 University of Iowa Hygienics Monitoring Data

In addition to monitoring conducted by EPA and DuPont, the University of Iowa Hygienics Laboratory has conducted monitoring of the residential wells adjacent to both the DuPont/Todtzt and Chemplex Sites since 1990. Monitoring of the residential wells was originally on a quarterly basis but as of 1994, the samples are now collected on a semiannual basis in the spring and fall. Table 8 lists the compounds that are routinely analyzed for. In addition, nitrates are monitored on an annual basis. The location of the residential wells is as indicated on Figure 8.

In general, there have been no exceedances of compounds above human health criteria that can be conclusively attributed to the DuPont/Todtzt Site. Nitrates have been detected in most of the residential wells. However, this compound is not a contaminant of concern at the DuPont/Todtzt Site. The nitrates are believed to be attributable to either agricultural practices or the Arcadian facility. Radon has also been detected in a number of the residential wells and this contaminant is also believed to not be attributable to the DuPont/Todtzt Site. Bis (2-ethylhexyl) phthalate is a contaminant that has been detected sporadically in two of the residential wells. While this contaminant was believed to have been used in DuPont's process, it also is a common plasticizer that is widely used and sometimes is detected as a laboratory contaminant. This contaminant was detected in two residential wells at concentrations of 150 ug/l and at 530 ug/l. However, when both wells were resampled, this contaminant was not detected. It is unknown at this time whether this contaminant is really present and if so, what the source is. At EPA's request, DuPont agreed to analyze for this contaminant during the April 25, 1995 semiannual monitoring event. It was not found so the Site is not thought to be the source of this contaminant.

EPA's evaluation of the DuPont/Todtzt Site indicates the following facts:

* The existing groundwater monitoring system continues to be capable of detecting any future releases from the DuPont impoundment. The current Remedial Action remains protective of human health and the environment.

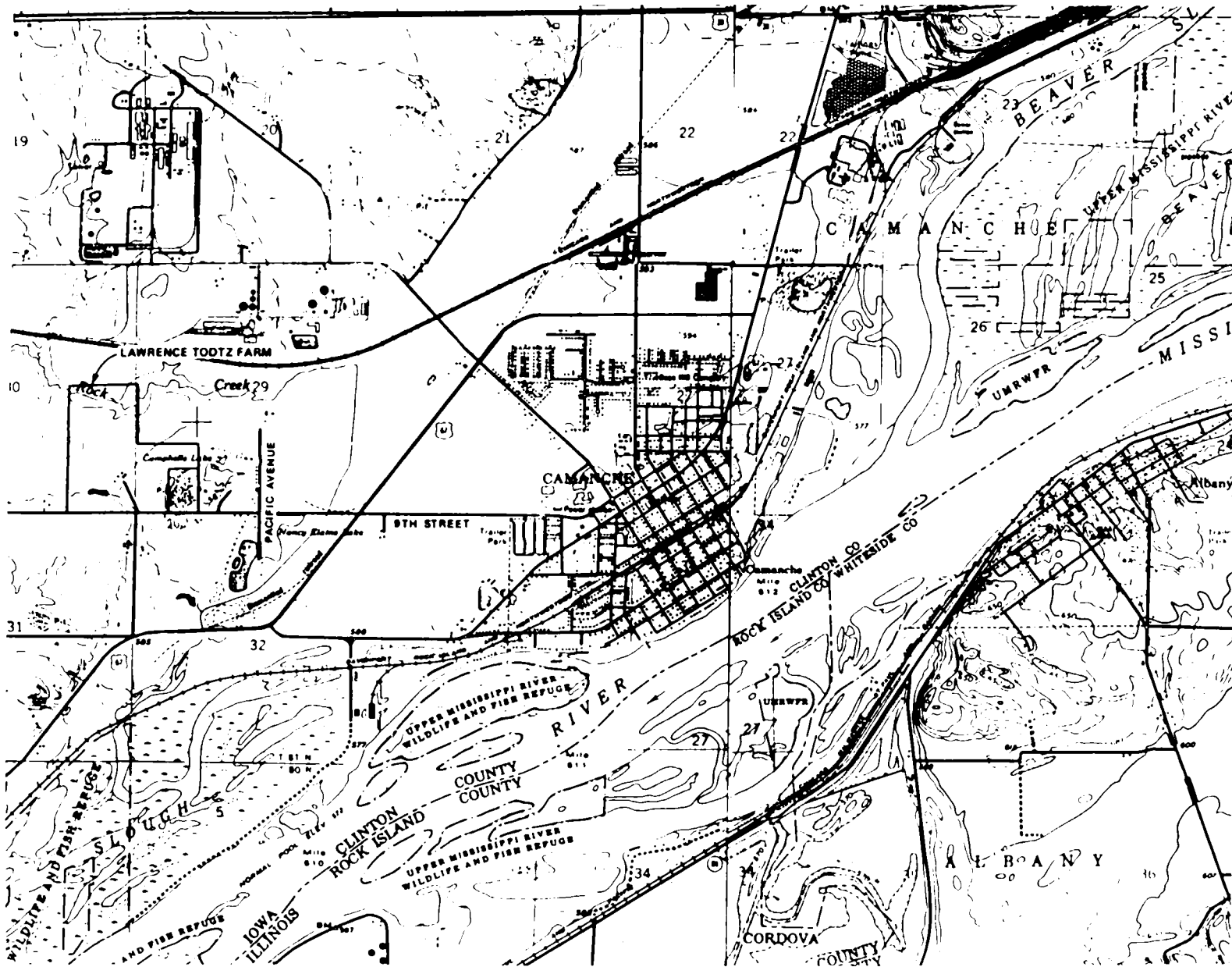
* In order to more reliably ensure protectiveness by early detection of any future releases from the impoundment, the semiannual monitoring that has been conducted for the past five years should continue.

9.0 RECOMMENDATIONS

The overall recommendation resulting from the evaluation of the DuPont site consists of continuing the monitoring program and pre-design, as specified in the CD with one exception. Since there have been incidences of elevated THF concentrations at monitoring well DU-05-S and the concentrations of some contaminants at the berm wells have been increasing, it is recommended that the semiannual monitoring requirement continue. According to the existing requirements, the semiannual sampling would revert to annual sampling in April 1996. The semiannual sampling will provide a mechanism to more accurately detect any releases from the Site.

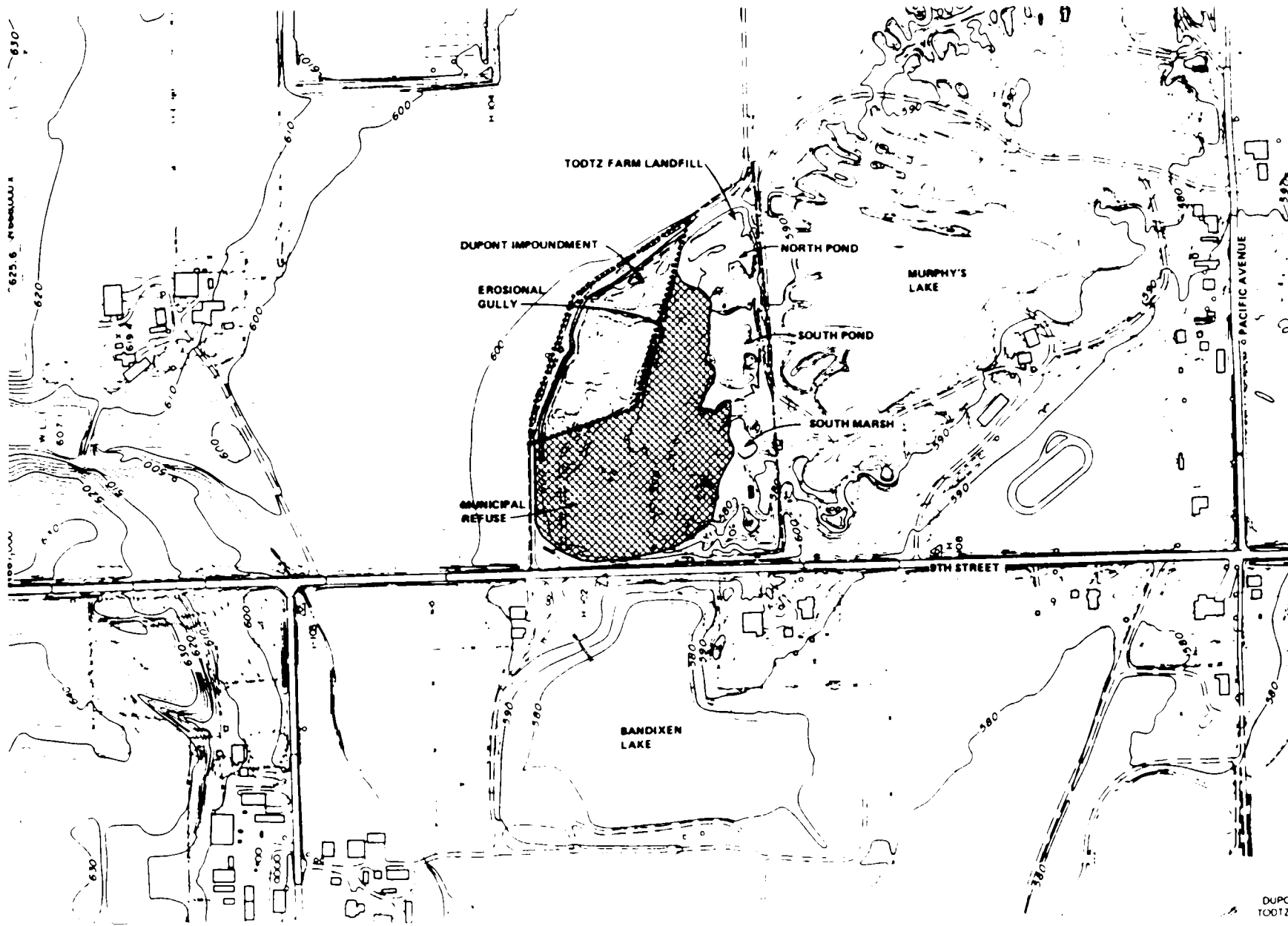
10.0 NEXT REVIEW

Since hazardous substances, pollutants or contaminants remain at the site at levels above the cleanup standards established for this remedial action and which will not allow for unlimited use or restricted exposure, the EPA will conduct additional Five-Year Reviews. According to guidance from EPA headquarters, this statutory Five-Year Review should have been conducted in September 1994 since the beginning of the Remedial Action was installation of the Bark residential well in September 1989. EPA Region VII has chosen to conduct this review within five years of the initiation of the on-site Remedial Action which began with the construction of the 2-foot soil cover and groundwater monitoring system since the CD was not entered until November 1990 and thus the Bark well installation was prior to this. However, EPA Region VII will follow the guidance for the schedule of the next review which will be completed five years after September 1994, that is in September 1999.



SOURCE USGS CLINTON AND CAMANCHE
7 1/2 MINUTE QUADRANGLE MAPS

FIGURE 1-1
SITE LOCATION MAP
DUPONT IMPOUNDMENT RD/RA
TODTZ FARM LANDFILL SITE



SCALE IN FEET
1" = 250'

FIGURE 1-2
SITE VICINITY MAP
DUPONT IMPOUNDMENT RODRA
TOOTZ FARM LANDFILL NPL SITE

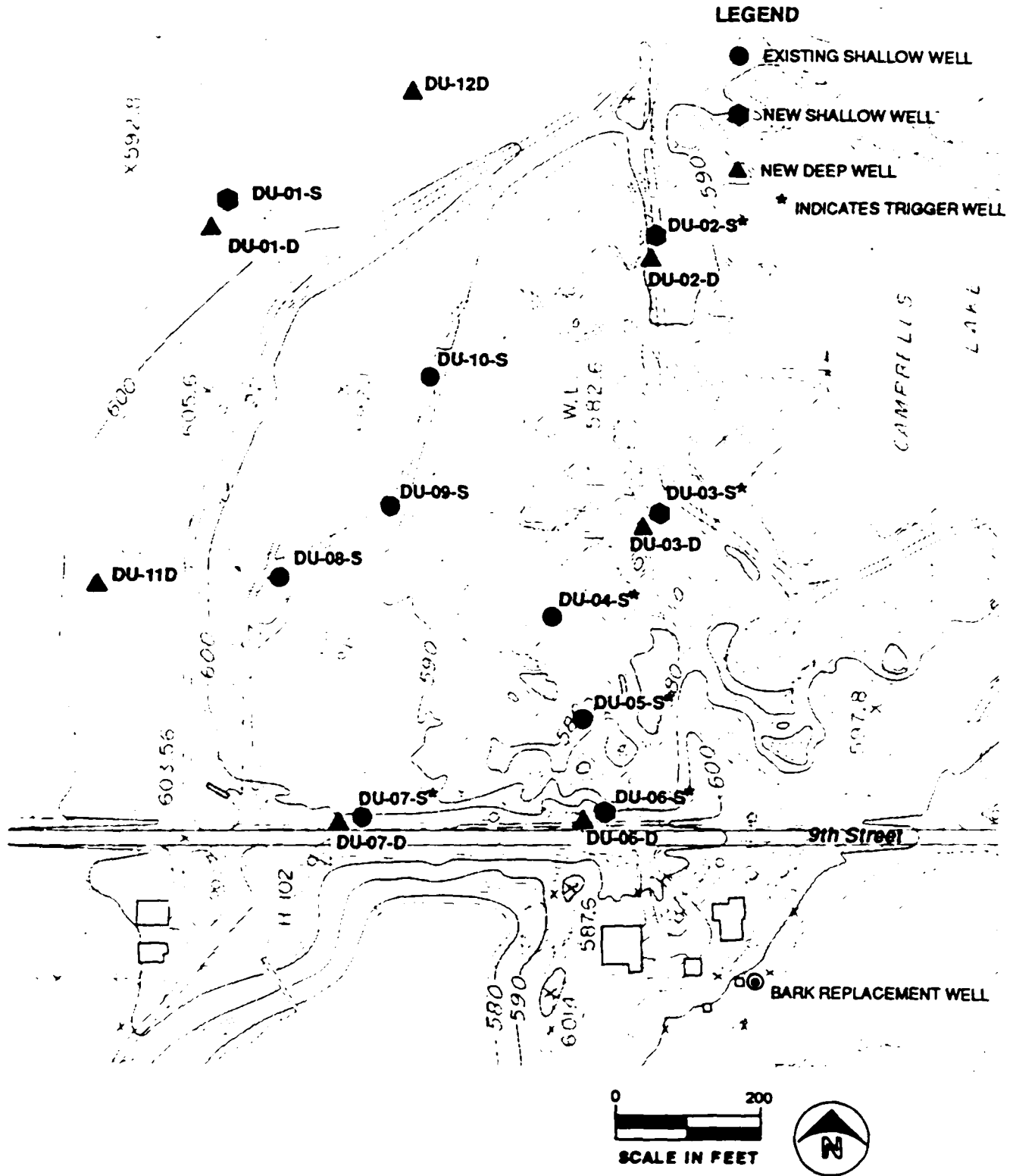


FIGURE 1-3
MONITORING WELL LOCATIONS
 DUPONT IMPOUNDMENT RD/RA
 TODTZ FARM LANDFILL SITE

TABLE 4-2
DuPont/Todtz Site

MONITORING PROGRAM

Volatile Organic Compounds

Tetrahydrofuran
Chloromethane
Bromoethane
Vinyl Chloride
Chloroethane
Methylene Chloride
Acetone
Carbon Disulfide
1,1-Dichloroethene
1,1-Dichloroethane
Trans-1,2-Dichloroethene
Chloroform
1,2-Dichloroethane
2-Butanone
1,1,1-Trichloroethane
Carbon Tetrachloride
Vinyl Acetate
Bromodichloromethane
1,2-Dichloropropane
Trans-1,3-Dichloropropene
Trichloroethene
Dibromochloromethane
1,1,2-Trichloroethane
Benzene
Cis-1,3-Dichloropropene
2-Chloroethylvinylether
Bromoform
4-Methyl-2-Pentanone
2-Hexanone
Tetrachloroethene
1,1,2,2-Tetrachloroethane
Toluene
Chlorobenzene
Ethylbenzene
Styrene
Total Xylenes

Semi-Volatile Organic Compounds

Total Phenol
(See Note 4)

Inorganic Compounds

Aluminum
Antimony
Arsenic
Barium
Beryllium
Cadmium
Calcium
Chromium
Cobalt
Copper
Iron
Lead
Magnesium
Manganese
Mercury
Molybdenum
Nickel
Potassium
Selenium
Silver
Sodium
Thallium
Titanium
Vanadium
Zinc

Miscellaneous Water Quality Parameters

Sulfate
Sulfide
Chloride
Total Organic Carbon
Total Organic Halogen

Field Parameters

Temperature
Conductivity
pH

- ¹ Shallow wells to be sampled on semi-annual basis for first five years, annually thereafter for 30 years, and reevaluated on a five year basis.
- ² Bedrock wells to be sampled semi-annually for first two years and once every five years thereafter unless on exceedance above background is detected.
- ³ Exceedance of 50% of a trigger level will result in quarterly monitoring.
- ⁴ Exceedance of 80% of a level two (2) trigger level will result in monitoring of shallow wells for U.S. EPA Target Compound List semi-volatile organic compounds.

TABLE 4-3

Table 1
 ACTION LEVEL 1 CONCENTRATION LIMITS
 TODTZ FARM LANDFILL NFL SITE

<u>Action Level 1 Compounds</u>	<u>Action Level 1 Concentration Limits (ug/l)</u>	
	<u>DU-04-S</u>	<u>Perimeter Wells (*)</u>
Carbon Disulfide	500	250
Tetrahydrofuran	100	50
Chromium (VI)	100	50
	<u>DU-02-S/DU-03-S</u>	<u>DU-06-S/DU-07-S</u>
Arsenic	125	50

* DU-02-S, DU-03-S, DU-05-S, DU-06-S, DU-07-S

Table 2
 ACTION LEVEL 2: CONCENTRATION LIMITS
 TODTZ FARM LANDFILL NPL SITE

<u>Action Level 2 Compounds</u>	<u>Action Level 2 Concentration Limits (ug/l)</u>	
	<u>DU-04-S</u>	<u>Perimeter Wells (*)</u>
Carbon Disulfide	3,500	1,750
Tetrahydrofuran	700	350
Chromium (VI)	-----	50
	<u>DU-02-S/DU-03-S</u>	<u>DU-06-S/DU-07-S</u>
Arsenic	250	75

* DU-02-S, DU-03-S, DU-05-S, DU-06-S, DU-07-S

TABLE 4-4

DUPONT IMPOUNDMENT RELATED CONSTITUENTS
TO MEET SPECIFIED CLEANUP CRITERIA
UPON COMPLETION OF GROUND WATER OPERABLE UNIT REMEDIATION

VOLATILE ORGANIC COMPOUNDS	Health Based Standard (ug/l)	Standard Type	Source	Note
Benzene	5	MCL	SDWA	(1)
Ethylbenzene	700	MCL	SDWA	(2)
Tetrachloroethylene	5	MCL	SDWA	(2)
Toluene	2000	MCL	SDWA	(2)
Carbon disulfide	3500	RfD	IRIS	(3)
2-Butanone (MEK)	1750	RfD	IRIS	(3)
Vinyl acetate	-	-	-	-
2-Hexanone	-	-	-	-
4-Methyl-2-pentanone (M1BK)	17500	RfD	IRIS	(3)
Xylenes	10000	MCL	SDWA	(2)
Tetrahydrofuran	700	RfD	IRIS	(3)
 ACID EXTRACTABLE PARAMETERS				
Phenol	1400	RfD	IRIS	(3)
2-Methylphenol	17500	RfD	IRIS	(3)
4-Methylphenol	17500	RfD	IRIS	(3)
Benzoic Acid	140000	RfD	IRIS	(3)
 METALS				
Antimony	14	RfD	IRIS	(3)
Arsenic	50	MCL	SDWA	(1)
Barium	1000	MCL	SDWA	(1)
Beryllium	175	RfD	IRIS	(3)
Chromium	50	MCL	SDWA	(1)
Cobalt	-	-	-	-
Lead	50	MCL	SDWA	(1)
Nickel	700	RfD	IRIS	(3)
Vanadium	245	RfD	HEAST	(4)

NOTES:

- (1) - Final Maximum Contaminant Level for drinking water as established by the Safe Drinking Water Act
- (2) - Proposed Maximum Contaminant Level for drinking water as established by the Safe Drinking Water Act
- (3) - Risk based concentrations based on verified reference doses (RfDs) deriv from toxicity values listed on U.S. EPA's Integrated Risk Information Sy (IRIS)
- (4) - Risk based concentrations based on verified reference doses (RfDs) deriv from toxicity values listed on U.S. EPA's Office of Research and Develop Health Effects Assessment Summary Tables (HEAST)

TABLE 8
UNIVERSITY OF IOWA HYGIENIC LABORATORY
ANALYTICAL PARAMETERS

GC/MS VOLATILES

ANALYTE	DETECTION LIMIT - ug/L
Acetone	5
Carbon disulfide	5
Methyl ethyl ketone	5
Tetrahydrofuran	5

VOLATILE ORGANIC ANALYSIS

ANALYTE	DETECTION LIMIT - ug/L
Benzene	0.5
Toluene	0.5
Ethylbenzene	0.5
Total Xylenes	0.5
Methylene chloride	0.5
1,1-Dichloroethylene	0.5
Trichloroethylene	0.5
Tetrachloroethylene	0.5

GC/MS EXTRACTABLES

ANALYTE	DETECTION LIMIT - ug/L
Phenol	5
4-Methylphenol	5
bis(2-Ethylhexyl)phthalate	10

TABLE 8 (cont.)

RADIOCHEMISTRY

ANALYTE	UNITS IN pCi/L
Radon-222	

INORGANIC CHEMISTRY

ANALYTE	UNITS
Laboratory pH	pH Units
Specific Conductance	umhos/cm
Total Alkalinity	mg/L as CaCO ₃
Total Hardness	mg/L as CaCO ₃
Total Dissolved Solids	mg/L
Sodium	mg/L
Chloride	mg/L

INORGANIC CHEMISTRY

ANALYTE	DETECTION LIMIT - mg/L
Total Organic Carbon	1 mg/L
Arsenic	.01 mg/L
Beryllium	.02 mg/L
Chromium	.01 mg/L
Lead	.01 mg/L

Description of units used within this report

ug/L - Micrograms per Liter
 pCi/L - PicoCuries per Liter
 mg/L as CaCO₃ - Milligrams per Liter as Calcium Carbonate
 mg/L - Milligrams per Liter
 pH Units - pH Units
 umhos/cm - Micromhos per Centimeter
 Detection Limit - Lowest concentration reliably measured

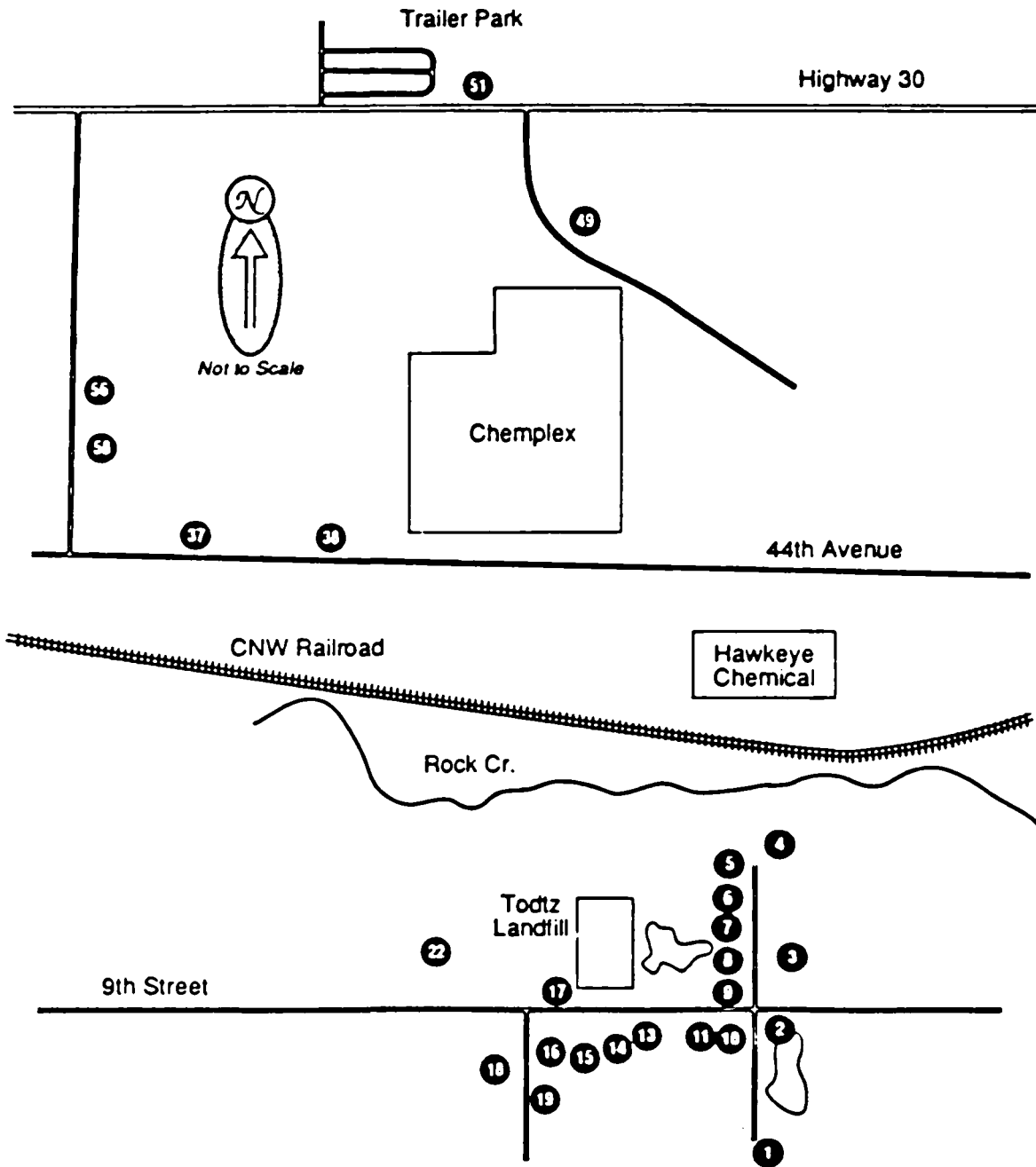


Figure 8. Sampling Locations

APPENDIX 1

DuPont and EPA Analytical Results

Sample Number	DuPont Impoundment Operable Unit Lawrence Tech Farm Landfill NPI Site Sampling/Analysis Data											
	DU-01-5 3/2/98 Value	DU-01-5 3/2/98 Value	DU-01-541 7/30/91 Value	DU-01-542 7/30/91 Value	DU-01-543 7/30/91 Value	DU-01-544 7/30/91 Value	DU-01-545 7/30/91 Value	DU-01-546 7/30/91 Value	DU-01-547 7/30/91 Value	DU-01-548 7/30/91 Value	DU-01-549 7/30/91 Value	DU-01-550 7/30/91 Value
Asbestos, Total	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Soluble	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Insoluble	0	0	0	0	0	0	0	0	0	0	0	0
Asbestos, Total	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Soluble	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Insoluble	0	0	0	0	0	0	0	0	0	0	0	0
Asbestos, Total	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Soluble	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Insoluble	0	0	0	0	0	0	0	0	0	0	0	0
Asbestos, Total	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Soluble	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Insoluble	0	0	0	0	0	0	0	0	0	0	0	0
Asbestos, Total	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Soluble	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Insoluble	0	0	0	0	0	0	0	0	0	0	0	0
Asbestos, Total	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Soluble	170	540	410	410	410	410	410	410	410	410	410	410
Asbestos, Insoluble	0	0	0	0	0	0	0	0	0	0	0	0
Asbestos, Total	170	540	410	410	410	410	410	410	410	410	410	410

District Improvement and Operations List
 List of Totals from Location VPI Site
 Sample/Financial Data

Sample Number	Date Sampled	DU-445		DU-446		DU-447		DU-448		DU-449		DU-450		DU-451		DU-452		DU-453		DU-454		DU-455		DU-456		DU-457		DU-458		DU-459		DU-460					
		Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q	Value	Q				
191000	191000	194000	191000	210000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000			
191000	191000	194000	191000	210000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000		
191000	191000	194000	191000	210000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	
191000	191000	194000	191000	210000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000	190000

District Independent Operable Unit
Levee and Trestle Facility Limited RWPL Site
Sampling/Pl analytical Data
(Page 1 of 6)

Sample Number/ Date Sampled	DU-45-5 3/25/98 Value	DU-45-5 5/23/98 Value	DU-45-5 7/17/98 Value	DU-45-5 9/22/98 Value	DU-45-5 11/11/98 Value	DU-45-5 12/29/98 Value	DU-45-5 1/29/99 Value	DU-45-5 3/19/99 Value	DU-45-5 5/19/99 Value	DU-45-5 7/16/99 Value	DU-45-5 9/16/99 Value	DU-45-5 11/19/99 Value	DU-45-5 1/20/00 Value	DU-45-5 3/20/00 Value	DU-45-5 5/19/00 Value	DU-45-5 7/21/00 Value	DU-45-5 9/21/00 Value	DU-45-5 11/16/00 Value	DU-45-5 1/15/01 Value	DU-45-5 3/16/01 Value	DU-45-5 5/15/01 Value	DU-45-5 7/14/01 Value	DU-45-5 9/14/01 Value	DU-45-5 11/15/01 Value	DU-45-5 1/15/02 Value	DU-45-5 3/15/02 Value	DU-45-5 5/15/02 Value	DU-45-5 7/15/02 Value	DU-45-5 9/15/02 Value	DU-45-5 11/15/02 Value	DU-45-5 1/15/03 Value	DU-45-5 3/15/03 Value	DU-45-5 5/15/03 Value	DU-45-5 7/15/03 Value	DU-45-5 9/15/03 Value	DU-45-5 11/15/03 Value	DU-45-5 1/15/04 Value	DU-45-5 3/15/04 Value	DU-45-5 5/15/04 Value	DU-45-5 7/15/04 Value	DU-45-5 9/15/04 Value	DU-45-5 11/15/04 Value	DU-45-5 1/15/05 Value	DU-45-5 3/15/05 Value	DU-45-5 5/15/05 Value	DU-45-5 7/15/05 Value	DU-45-5 9/15/05 Value	DU-45-5 11/15/05 Value																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
Aluminum, Total	2	16	27	110	140	115	140	180	160	230	270	270	310	310	340	350	370	380	400	420	440	450	460	480	500	520	540	560	580	600	620	640	660	680	700	720	740	760	780	800	820	840	860	880	900	920	940	960	980	1000	1020	1040	1060	1080	1100	1120	1140	1160	1180	1200	1220	1240	1260	1280	1300	1320	1340	1360	1380	1400	1420	1440	1460	1480	1500	1520	1540	1560	1580	1600	1620	1640	1660	1680	1700	1720	1740	1760	1780	1800	1820	1840	1860	1880	1900	1920	1940	1960	1980	2000	2020	2040	2060	2080	2100	2120	2140	2160	2180	2200	2220	2240	2260	2280	2300	2320	2340	2360	2380	2400	2420	2440	2460	2480	2500	2520	2540	2560	2580	2600	2620	2640	2660	2680	2700	2720	2740	2760	2780	2800	2820	2840	2860	2880	2900	2920	2940	2960	2980	3000	3020	3040	3060	3080	3100	3120	3140	3160	3180	3200	3220	3240	3260	3280	3300	3320	3340	3360	3380	3400	3420	3440	3460	3480	3500	3520	3540	3560	3580	3600	3620	3640	3660	3680	3700	3720	3740	3760	3780	3800	3820	3840	3860	3880	3900	3920	3940	3960	3980	4000	4020	4040	4060	4080	4100	4120	4140	4160	4180	4200	4220	4240	4260	4280	4300	4320	4340	4360	4380	4400	4420	4440	4460	4480	4500	4520	4540	4560	4580	4600	4620	4640	4660	4680	4700	4720	4740	4760	4780	4800	4820	4840	4860	4880	4900	4920	4940	4960	4980	5000	5020	5040	5060	5080	5100	5120	5140	5160	5180	5200	5220	5240	5260	5280	5300	5320	5340	5360	5380	5400	5420	5440	5460	5480	5500	5520	5540	5560	5580	5600	5620	5640	5660	5680	5700	5720	5740	5760	5780	5800	5820	5840	5860	5880	5900	5920	5940	5960	5980	6000	6020	6040	6060	6080	6100	6120	6140	6160	6180	6200	6220	6240	6260	6280	6300	6320	6340	6360	6380	6400	6420	6440	6460	6480	6500	6520	6540	6560	6580	6600	6620	6640	6660	6680	6700	6720	6740	6760	6780	6800	6820	6840	6860	6880	6900	6920	6940	6960	6980	7000	7020	7040	7060	7080	7100	7120	7140	7160	7180	7200	7220	7240	7260	7280	7300	7320	7340	7360	7380	7400	7420	7440	7460	7480	7500	7520	7540	7560	7580	7600	7620	7640	7660	7680	7700	7720	7740	7760	7780	7800	7820	7840	7860	7880	7900	7920	7940	7960	7980	8000	8020	8040	8060	8080	8100	8120	8140	8160	8180	8200	8220	8240	8260	8280	8300	8320	8340	8360	8380	8400	8420	8440	8460	8480	8500	8520	8540	8560	8580	8600	8620	8640	8660	8680	8700	8720	8740	8760	8780	8800	8820	8840	8860	8880	8900	8920	8940	8960	8980	9000	9020	9040	9060	9080	9100	9120	9140	9160	9180	9200	9220	9240	9260	9280	9300	9320	9340	9360	9380	9400	9420	9440	9460	9480	9500	9520	9540	9560	9580	9600	9620	9640	9660	9680	9700	9720	9740	9760	9780	9800	9820	9840	9860	9880	9900	9920	9940	9960	9980	10000

Duffield Improved and Operable List
Larimer Total from Landfill NPL Site
Sampling/Historical Data
Page 3 of 8

Sample Number	Parent Sample	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715	DU-8715																			
101	101	40	24	47	314	15 LT	18 J	170	470	120	106	141 LT	74 LT	74 LT	881 LT	141 LT	141 LT	141 LT	7400	7100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100						
102	102	40	24	47	314	15 LT	18 J	170	470	120	106	141 LT	74 LT	74 LT	881 LT	141 LT	141 LT	141 LT	7400	7100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100

APPENDIX 2

DuPont and EPA Analytical Results of Trigger Compounds

TOTDZ FARM LANDFILL ARSENIC (ppb)

WELL NO	3/88	6/89	10/90	7/91	1/92	7/92	4/93	6/93	8/93	10/93	1/94	4/94	6/94
DU-01S				2.2LT 33	5.5J	1.31J				3.9J			
DU-02S	84 60	50 30	41.3	34 41 34	29 26 (FR)	28.8	29			27.2	27.2	24.5 22.8 (FR)	37.0
DU-03S		40	34.8	30 37 42	20	30.1 30.5 (FR)	16 15.2 (FR)			37.9	17.6	22.1	36.0
DU-04S	1J	2	5.8J	6LT	4.7J	3.16LT	3.8LT			7.4LT	3.8LT	3.1LT	
DU-05S	2		1.6J	2.7LT				NA	NA	2.5LT	2LT		
DU-06S	9J 9	6	14.8	9.8LT 9.3LT 6.9LT	9J	7.02LT	3.6LT			9.3J 11.3J (FR)	5.8J	5LT	
DU-07S	1J		2.1J	2.7LT	14	8.19LT	3.9LT			9.8LT	3.8LT 4.5LT (FR)	3.6LT	
DU-08S	90 60			130	430	131	119			389		326	
DU-09S	22J			17	7.2J	33.9	41.1			13.6		34.5	
DU-010S	1600 1500			2490 2210 (FR)	2350	2400	1980			1640		1980	

LT - Inorganic or conventional parameter concentration is below reporting limit. Because of the possibility of interferences being incorrectly identified as target analytes by the inorganic and conventional parameter methodologies, positive identification of the compounds at these concentrations cannot be made. The reported concentration is estimated.

B - Blank Contamination

J - Estimated

U - Not detected

TB - Trip Blank

FR - Field Replicate

11/9/94

**TOTDZ FARM LANDFILL
CARBON DISULFIDE (ppb)**

WELL NO	3/88	6/89	10/90	7/91	1/92	3/92	7/92	4/93	6/93	8/93	10/93	1/94	4/94	6/94
DU-01S	0			0	0		0	0			0		0	
DU-02S	0	0	0	0	0		0	0			1J	0	0	
DU-03S		0	3J	0	0	5J 8	0	0			0		0	
DU-04S	0	0	0	0	0		0	0			0	0	0	
DU-05S	0	0	0	0	0		0	0	0	0	0	0	0	
DU-06S	0	0	0	0	0		0	0			0	0	0	
DU-07S	0	0	0	0	0		0	0			0	0	0	
DU-08S	1120 749J			0	27		76	52			370J		0	
DU-09S	4.4J	0		0	1.31J		2J	0			0		0	
DU-010S	4250 2350			52.9 55 (FR)	0		0	16			13		0	

J - Estimated
FR - Field Replicate

11/9/94

**TOTDZ FARM LANDFILL
CHROMIUM (VI), TOTAL (ppb)**

WELL NO	3/88	6/89	10/90	7/91	1/92	3/92	7/92	4/93	6/93	8/93	10/93	1/94	4/94	6/94
DU-01S	0			0	0		0	0			0		0	
DU-02S	0	0	0	0	0		0	0			1J	NA	0	
DU-03S		0	0	0	0	0	0	0			0	NA	0	
DU-04S	0	0	0	0	0		0	0			0	NA	0	
DU-05S	0	0	0	0	0		0	0	0	0	0	NA	0	
DU-06S	0	0	0	0	0		0	0			0	NA	0	
DU-07S	0	0	0	0	0		0	0			0	NA	0	
DU-08S	0			0	0		0	20			0		0	
DU-09S	0	0		0	0		0	0			0		0	
DU-010S	0	0		0	0		0	0			0		0	

J - Estimated
FR - Field Replicate
NA - Not Analyzed

11/9/94

TOTDZ FARM LANDFILL TETRAHYDROFURAN (THF) (ppb)

WELL NO	3/88	10/90	7/91	1/92	3/92	7/92	4/93	6/93	8/93	10/93	1/94	4/94	6/94
DU-02S			14.5 9.25J	0 0 (FR)		0	0			0			
DU-03S		15		43	10 10U 10U 10U	0 0 (FR) 3 (TB) J	10 0 (FR)			0			
DU-04S				0		11B	0			0		20 47*	35.7 34 59*
DU-05S				0		0	41	110 110 91 93 101*	51 50 51 48 10* 15*	0		38 34 42 37 57* 63*	12 8.1 9.3 6.8 14* 15*
DU-06S				0		0	0			0			
DU-07S			15.2	0		0	0			0		22	4.5J
DU-08S	74000		15800	7140		17000	12000			45000		46000	
DU-09S	56300J 85900J		9700	1040		950	260			280J		350	
DU-010S			428 378	300		340	190			240		290	

* FIGURES WITH ASTERISKS ARE EPA SAMPLES

B - Blank Contamination
 J - Estimated
 U - Not Detected
 TB - Trip Blank
 FR - Field Replicate

11/9/94



APPENDIX 3

Photographs of the April 25, 1995 Inspection

Unscanned Items

Photographs that could not be scanned
exist with this document
or as a document

To view the photographs, please contact the
Superfund Records Center

