Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken. South Carolina 29802

July 28, 2025

Ms. Susan B. Fulmer, P. G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Environmental Services
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Site Remedial Project Manager
Superfund and Emergency Management Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Calendar Year 2024 D-Area Oil Seepage Basin Operable Unit (631-G) Groundwater Mixing Zone Letter Report, SEMS Number: 27

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy (DOE) is submitting this letter report for your review. Please review the subject letter report and provide your comments within one hundred twenty (120) days of receipt. The time and effort that the South Carolina Department of Environmental Services and the U. S. Environmental Protection Agency have given on the subject operable unit are greatly appreciated.

Comments or questions from you or your staff may be directed to me at (803) 952-6211 or the DOE Program Manager, Khari Bell, at (803) 679-7086.

Sincerely,

MATTHEW BAKER Digitally signed by MATTHEW BAKER
Date: 2025.07.24 10:46:47 -04'00'

Matthew R. Baker
Acting FFA Remedial Project Manager
DOE-Savannah River Operations Office
Remediation, Deactivation, and Decommissioning Division

RDDD-25-152

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Calendar Year 2024 D-Area Oil Seepage Basin Operable Unit (631-G)
Groundwater Mixing Zone Letter Report

Introduction

This letter report was prepared to support the regulatory reporting requirements for the D-Area Oil Seepage Basin (DOSB) Operable Unit (OU) (631-G). The DOSB OU is listed as a Resource Conservation and Recovery Act 3004(u) Solid Waste Management Unit/Comprehensive Environmental Response, Compensation, and Liability Act unit in Appendix C of the Federal Facility Agreement for the Savannah River Site (SRS). The reporting requirements are specified in the Groundwater Mixing Zone (GWMZ) Application for the DOSB (WSRC-RP-97-422, Revision 1.5, May 2009), a document approved by the U.S. Environmental Protection Agency (USEPA) and the South Carolina Department of Environmental Services (SCDES)[1].

In accordance with the GWMZ Application, a report must be submitted on or before July 31 to present groundwater data and conditions for the previous calendar year (CY). During even-numbered years, a mixing zone report that contains groundwater data tables, contaminant plume maps, and descriptions of groundwater monitoring data and results will be submitted. During odd-numbered years (such as this one), a letter report that summarizes groundwater monitoring data and results will be submitted. This is the seventh letter report submitted for the DOSB OU.

Groundwater monitoring is performed at the DOSB OU to ensure that established groundwater concentration limits (maximum contaminant levels [MCLs] at GWMZ boundaries and mixing zone concentration limits [MZCLs] within the boundaries) are not exceeded for the DOSB GWMZ constituents. The GWMZ constituents include tetrachloroethylene (PCE), trichloroethylene (TCE), cis-1,2-dichloroethylene (cDCE), 1,1-dichloroethylene (1,1-DCE), vinyl chloride (chloroethene) (VC), benzene, and dichloromethane (methylene chloride). The monitoring well network consists of 18 wells including two background wells, nine plume compliance wells, and seven boundary compliance wells. In addition, there are four near-source "additional" monitoring wells, and one surface water station that are sampled but are not a part of the approved GWMZ monitoring network (Figure 1). The background wells are sampled biennially (i.e., second quarter CY during even years) while the plume compliance wells, boundary compliance wells, and additional monitoring wells are sampled annually during the second quarter of the CY. In addition, the surface water station is scheduled for sampling on an annual basis.

The concentrations of the GWMZ constituents detected in groundwater are compared to the MZCLs from the Revision 1.5 GWMZ Application. If the concentration of a GWMZ constituent exceeds the MZCL at a plume compliance well (or the standards listed in Regulation 61-58: State Primary Drinking Water Regulations or the USEPA safe drinking water MCL at a boundary compliance well, as appropriate), the well will be resampled within 30 days of receipt of a valid data report to confirm that the exceedances occurred. If the event is validated by the confirmation sample results, SRS will notify the USEPA and SCDES of the occurrence. As shown in Table 1, there were no exceedances of the MZCLs in the plume compliance wells and no exceedances of MCL standards in the boundary compliance wells in 2024.

[1] South Carolina Department of Environmental Services (SCDES) was known as South Carolina Department of Health and Environmental Control (SCDHEC) prior to July 1, 2024.

2024 Data Analyses

The DOSB OU groundwater monitoring well samples were collected on May 28 and 29 for the 2024 sampling event.

Rainfall conditions were above average for calendar year 2024. The average rainfall amount for the last 40 years, since 1984, as measured at station 400-D (till March 1, 2020) and as derived from radar-based tools since then at the Site is 47.02 inches. The 2024 rainfall amount totaled 53.7 inches, which was 6.68 inches above average and 9.26 inches below the 2023 rainfall amount (62.96 in). The average DOSB OU water elevations were approximately two (2) feet (ft) above 2022 levels and about the same as 2023 levels. Depth to water is provided in Table 2. Horizontal groundwater flow rates for 2024 were calculated at 46.6 ft/year (yr) in the AQ1/AQ2 aquifer zone and 10.8 ft/yr in the AQ3 aquifer zone, both of which are higher compared to flow rates calculated in 2022 but not much higher than the flow rates estimated for 2023. Figure 2 provides the potentiometric map of water levels indicating that the flow directions in AQ1/2 and AQ3 are in the south-southeast direction whereas the flow direction in the GA aquifer is towards south-southwest. Figure 3 presents a conceptual cross section depicting the regional hydrostratigraphy at the DOSB OU.

Groundwater data for 2024 indicates that the DOSB OU groundwater plumes have not increased in size. Table 1 provides the groundwater results from the 2024 sampling.

Background wells DOB 9 and DOL 1 were non-detect for all analytes.

The "additional" monitoring wells (DOB 11, DOB 12, DOB 13, and DOB 14) are located near the original source area. Maximum concentrations of the GWMZ contaminants at these locations are as follows: 1,1-DCE (not detected); benzene (1.2 micrograms per liter [µg/L], well DOB 11); VC (18 µg/L, well DOB 11); cDCE (6.4 µg/L, well DOB 11); methylene chloride (not detected); TCE (4.1 µg/L, well DOB 12); and PCE (2.1 µg/L, well DOB 12). The GWMZ constituents that were detected do not exceed their respective MZCLs (1,1-DCE [7 µg/L], benzene [5 µg/L], VC [147 µg/L], cDCE [1,164 µg/L], PCE [78 µg/L], and TCE [200 µg/L]) at the "additional" monitoring wells. Concentrations at wells DOB 13 and DOB 14 were non-detect for all GWMZ contaminants. Upper AQ1-screened well DOB 12 and lower AQ2-screened well DOB 11 have displayed variable concentrations for the last few years.

The maximum concentrations in DOSB OU Plume Compliance wells include: 1,1-DCE (not detected); benzene (0.96 µg/L, J-qualified, well DOB 15A); VC (15 µg/L, well DOB 15A); cDCE (61 µg/L, well DOB 15); methylene chloride (not detected); TCE (18 µg/L, well DOB 15A); and PCE (5.4 µg/L, well DOB 15A). Some of these wells continue to have contaminant concentrations above the MCLs for VC (2 µg/L), PCE (5 µg/L) and TCE (5 µg/L). However, the GWMZ constituents that were above their respective MCLs do not exceed their respective MZCLs (VC [147 µg/L], PCE [78 µg/L] and TCE [200 µg/L]) at the Plume Compliance wells.

The DOSB OU Boundary Compliance wells were non-detect for all GWMZ constituents.

The surface water station DOBSW1 was dry and unable to be sampled in 2024.

Three of the nine Plume Compliance wells (DOB 15, DOB 15A, and DOL 2) and an additional well (DOB 11) show contamination above MCLs (Table 1). Plume maps for PCE, TCE, cDCE, and VC are provided in Figures 4 through 7, respectively. Figure 8 shows the VC plume in cross-section. None of the Plume Compliance wells exceeded their respective MZCLs. These three wells are located within 500 feet of the original source area. Contaminant levels at wells farther downgradient remain below MCLs and display stabilizing or decreasing trends indicating the total mass in the aquifers is decreasing. In general, most volatile organic compound (VOC) concentrations continue to show an overall decreasing trend in the DOSB OU wells. However, VOC concentrations intermittently increase/decrease in various wells, including DOB 11, and Plume Compliance wells DOB 15, DOB 15A, DOB 15D, and DOB 16, DOB 19, and DOB 19 A. These fluctuations may indicate: 1) core plume movement downgradient from the original source area; 2) effects of increased/decreased rainfall; and 3) diffusion of VOCs from lower permeability zones within the aquifer. Periods of high water-levels may correlate with increased contaminant concentrations. It should be noted that the last two years, 2023 and 2024, have experienced average annual precipitation that is significantly higher than the long-term average at DOSB OU. During times of increased VOC concentrations, contaminant levels in the DOB wells are, mostly, still far below historical highs and remain below the MZCLs.

Contaminant trends at the highest concentration well DOB 15 show steady concentrations of PCE, TCE, cDCE, and VC (Figure 8). At current trends, the data indicates that it will take longer to achieve MCLs than the modeled cleanup time of 20 years (~2027). Data also indicates that biodegradation has significantly decreased since the source removal action conducted in 1996, which removed the carbon source. As for the diffusion/dispersion/of VOCs, it is speculated that VOCs are being retarded by the aquitards and clayey zones and/or restricted groundwater flow zones through tighter aquifer zones. Wells DOB 15, DOL 2, and DOB 16 are located within or below clayey zones in which VOCs may be sorbing to those clays thereby prolonging the physical attenuation process (dispersion) as well as slowing the transport vertically. Figure 8 shows the VC plume in cross-section and vertical well distribution. Natural attenuation field parameters are included in Table 2. The amount of aerobic degradation of VC at these locations may be less than the amount being physically transported from previously higher concentrated areas located above and upgradient of those zones as well as what is desorbing from clayey zones. As shown in Figure 9, trends of parent and daughter VOCs at wells DOB 11 (source), DOL 2 (near source), and DOB 15 (intermediately located) show that there has not been much divergence of contaminant trends (increases of degradation products compared to parent products), which indicates that reductive dechlorination is no longer a significant process.

Contaminant levels in wells downgradient of well cluster DOB 15, wells DOB 19 and DOB 19A, display decreasing trends over the long-term (Figure 10). Additionally, farther downgradient boundary compliance wells (well clusters DOB 20, DOB 21, and DOB 22) concentrations continue to be below MCLs or remain non-detect; therefore, the DOSB OU GWMZ is performing adequately.

Due to the presence of chlorinated solvents at the site, the potential that 1,4-dioxane could be present in groundwater exists, because it was often added to chlorinated solvents as a stabilizer and corrosion inhibitor. A recommendation came from the Fourth Five-Year Remedy Review Report for SRS OUs with Groundwater Remedies (SRNS-RP-2015-00419, Revision 1, July 2016) to sample for 1,4-dioxane at the DOSB OU. Per the recommendation, all wells at the DOSB OU were sampled for 1,4-dioxane during the second quarters of 2016 and 2017. 1,4-Dioxane was only detected in three of the monitoring wells (DOB 15, DOL 2, and DOB 16). Results from these three wells are shown in Figure 11. 1,4-Dioxane will continue to be sampled at these three wells to collect sufficient data for trending. Over the past five years

1,4-dioxane concentrations have been the greatest at DOB 16 with a maximum concentration of 6 µg/L in 2016 and displaying overall decreasing concentrations since. There is currently no MCL for 1,4-dioxane, but the current USEPA tap water regional screening level is 0.46 µg/L. The sampling results from 2024 indicate two detected values measuring 1.5 µg/L (J qualified) and 3 µg/L at wells DOL2 and DOB 16 respectively.

Conclusion

In summary, the groundwater data presented in the 2024 DOSB OU letter report show that in general, concentrations of most of the GWMZ constituents continue to show an overall stabilizing or decreasing trend in the DOSB OU wells. The DOSB OU contaminant plume continues to remain below the MZCLs for the plume compliance and near-source "additional" wells and below the MCLs for the boundary compliance wells. In 2024, the DOSB OU boundary compliance wells were non-detect for all GWMZ constituents. 1,4-Dioxane was detected in two of the three wells sampled in 2024 with the maximum result of 3 µg/L at DOB 16.

Sampling data obtained during 2024 confirms that the existing GWMZ boundaries are adequate and continue to enclose the DOSB OU plumes.

A full CY 2025 data report, including multiple plume maps and time-series trends of contaminant data, will be submitted in July 2026.

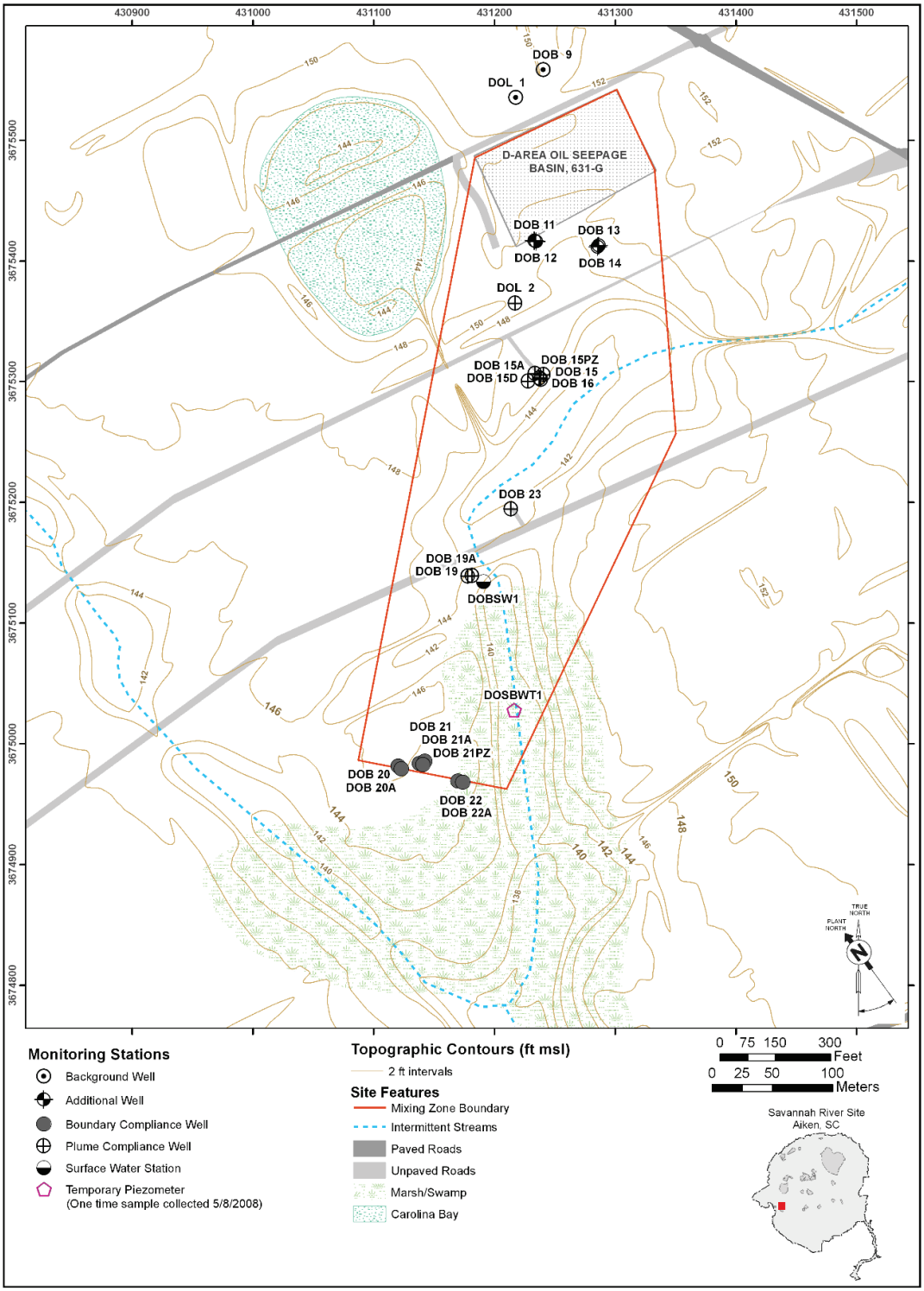

Figure 1. Monitoring Well Network at the DOSB OU

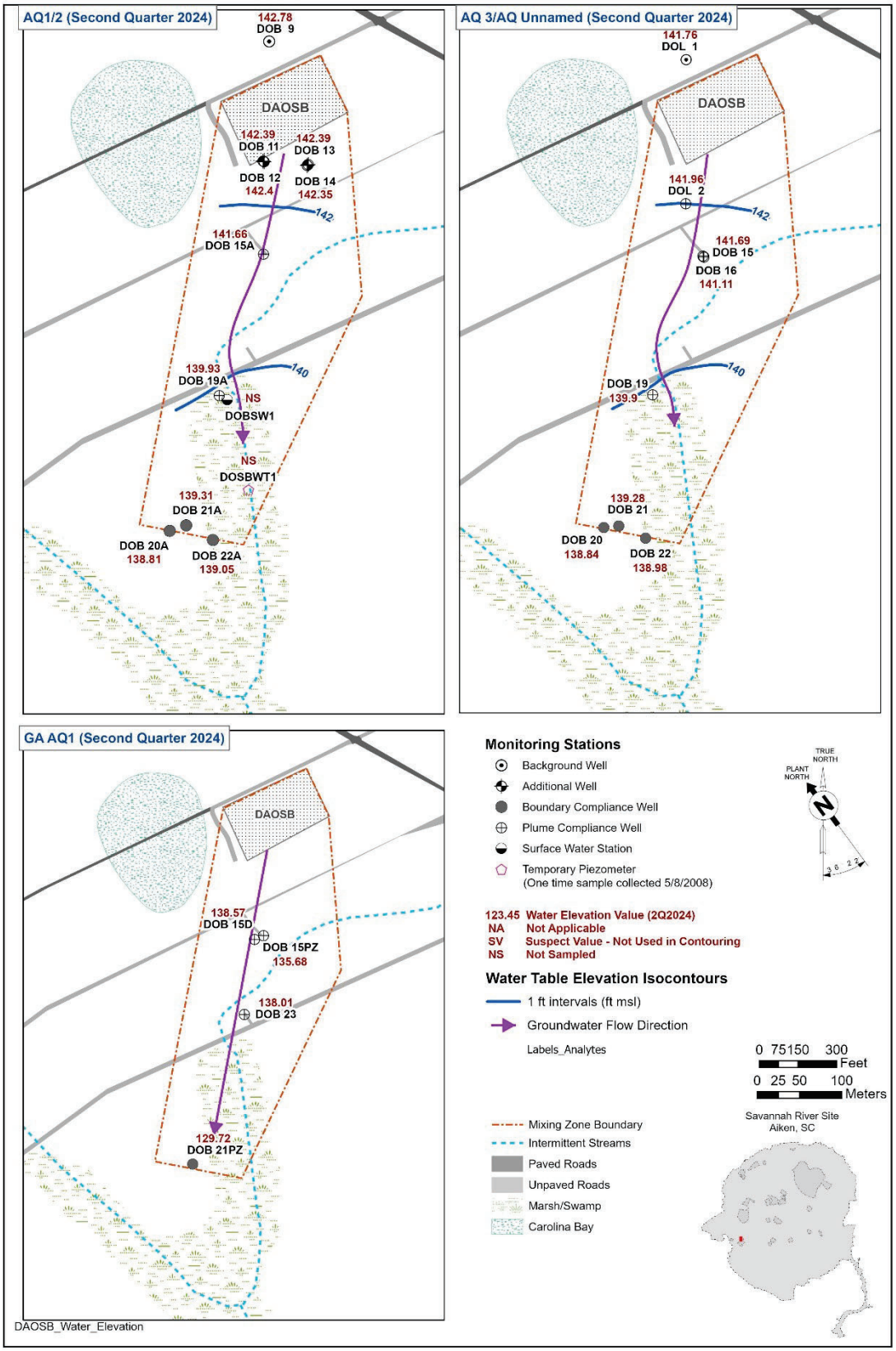

Figure 2. Potentiometric Map of Water Level Elevations at the DOSB OU in 2024

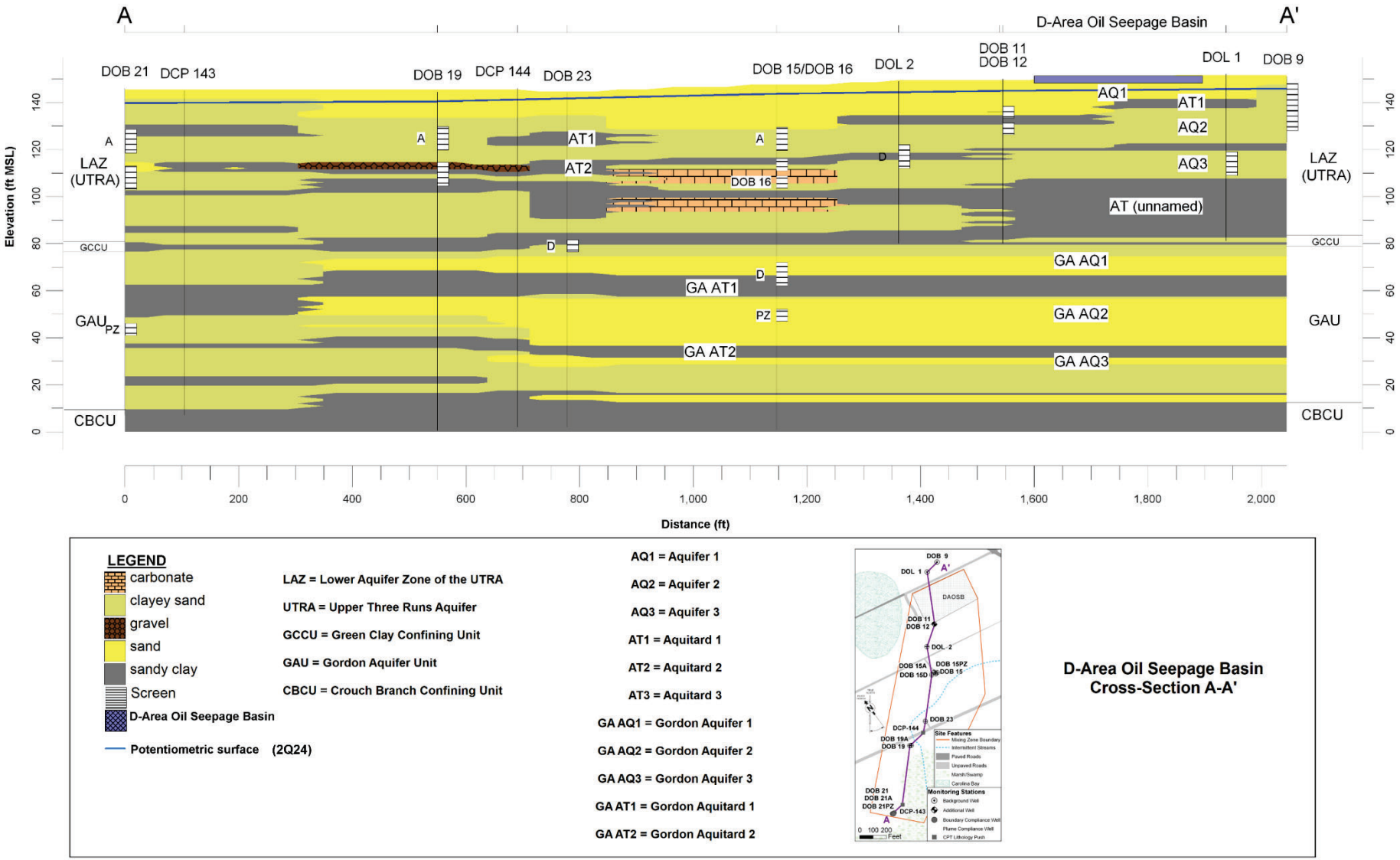

Figure 3. DOSB Conceptual Cross-Section A-A'

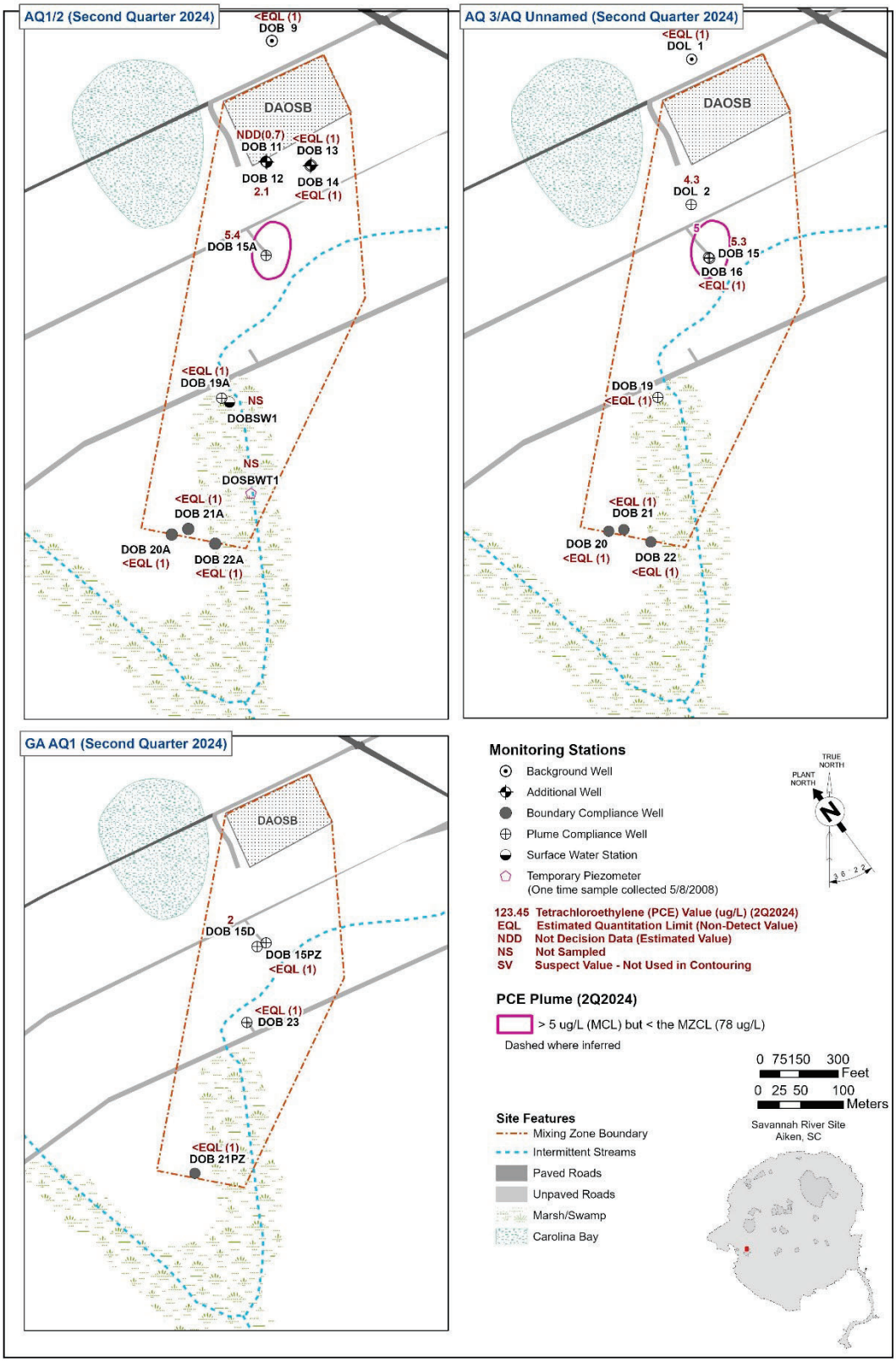

Figure 4. 2024 PCE Plume and Concentrations at the DOSB OU

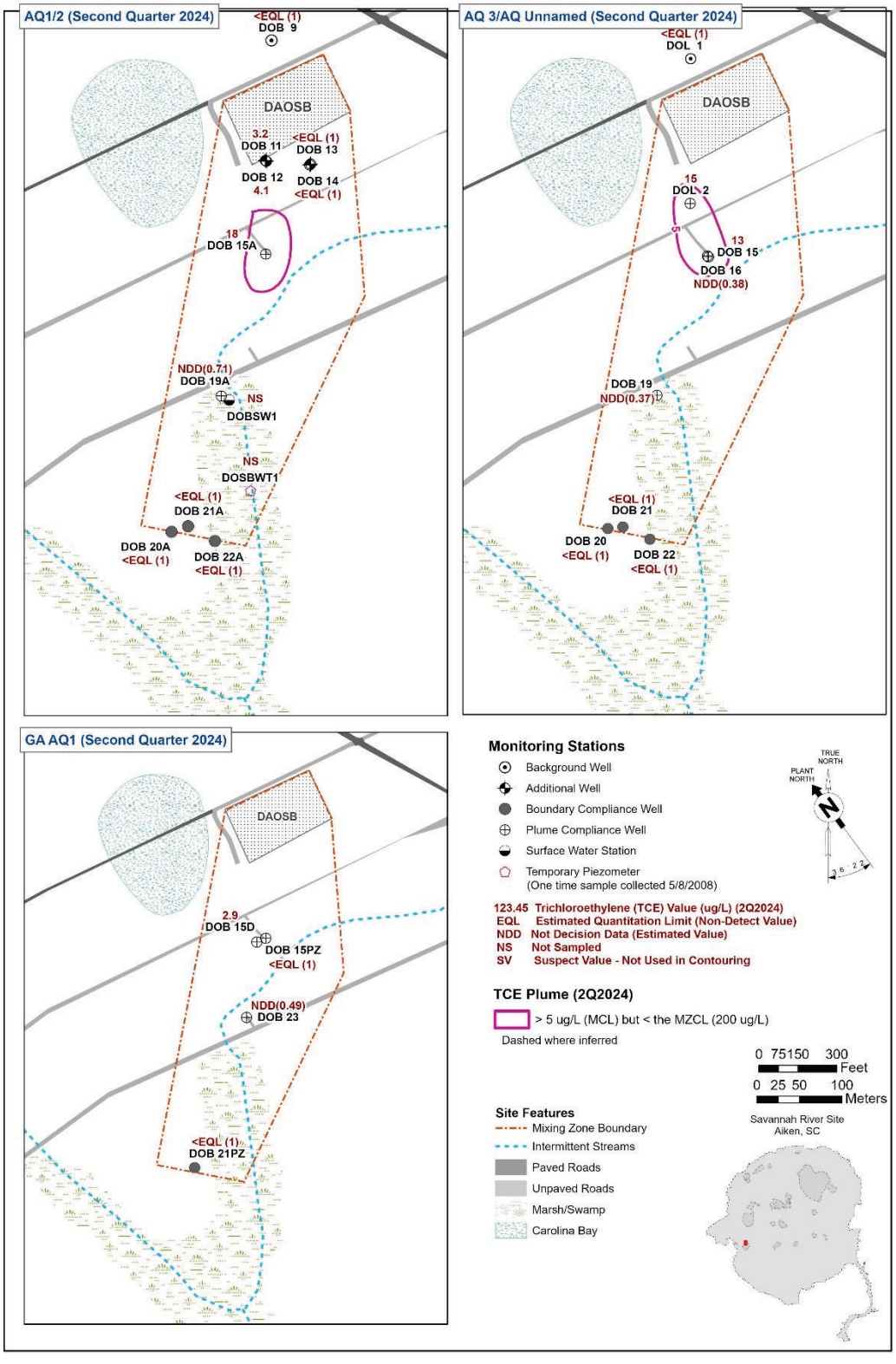

Figure 5. 2024 TCE Plume and Concentrations at the DOSB OU

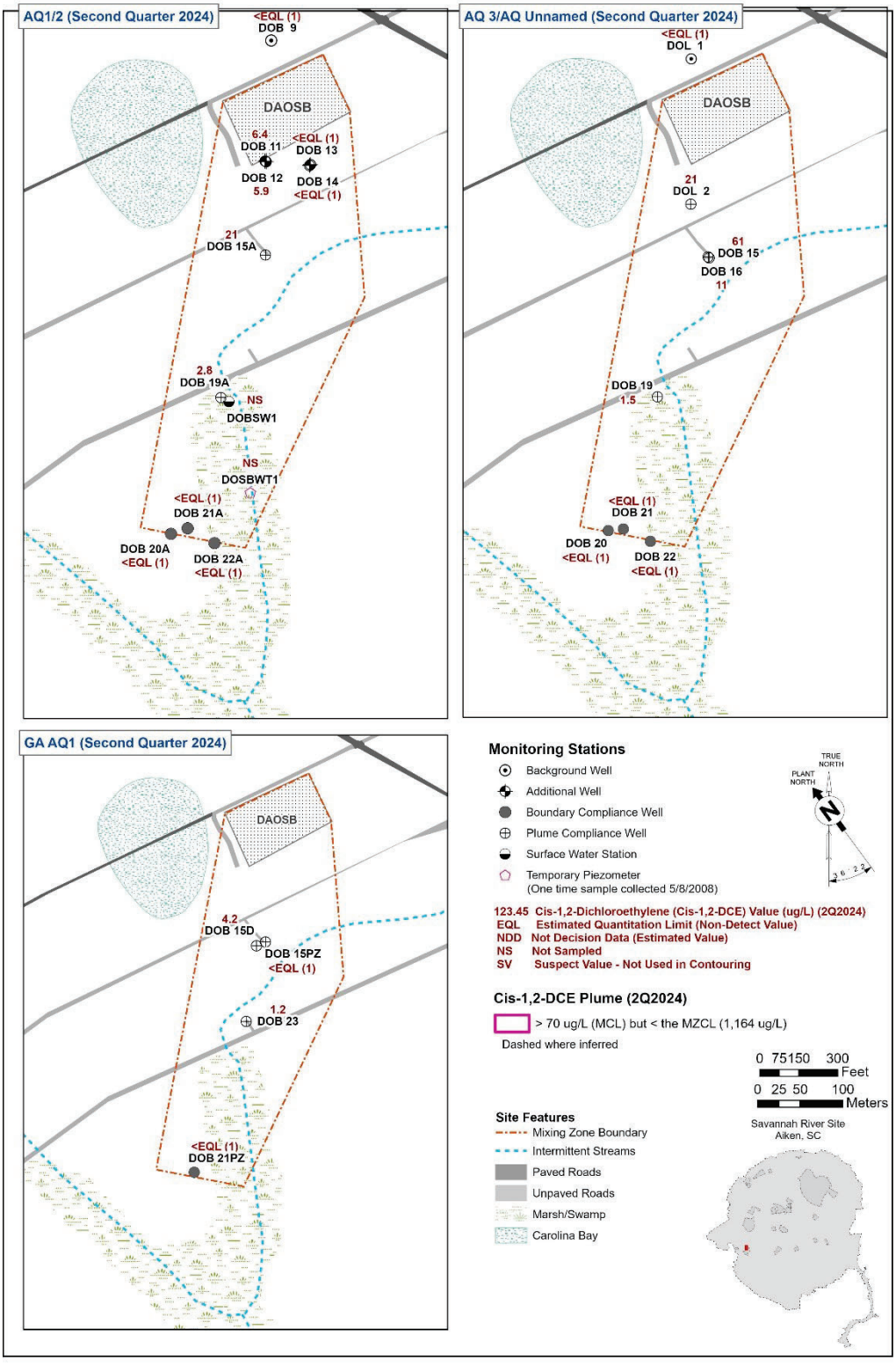

Figure 6. 2024 cDCE Plume and Concentrations at the DOSB OU

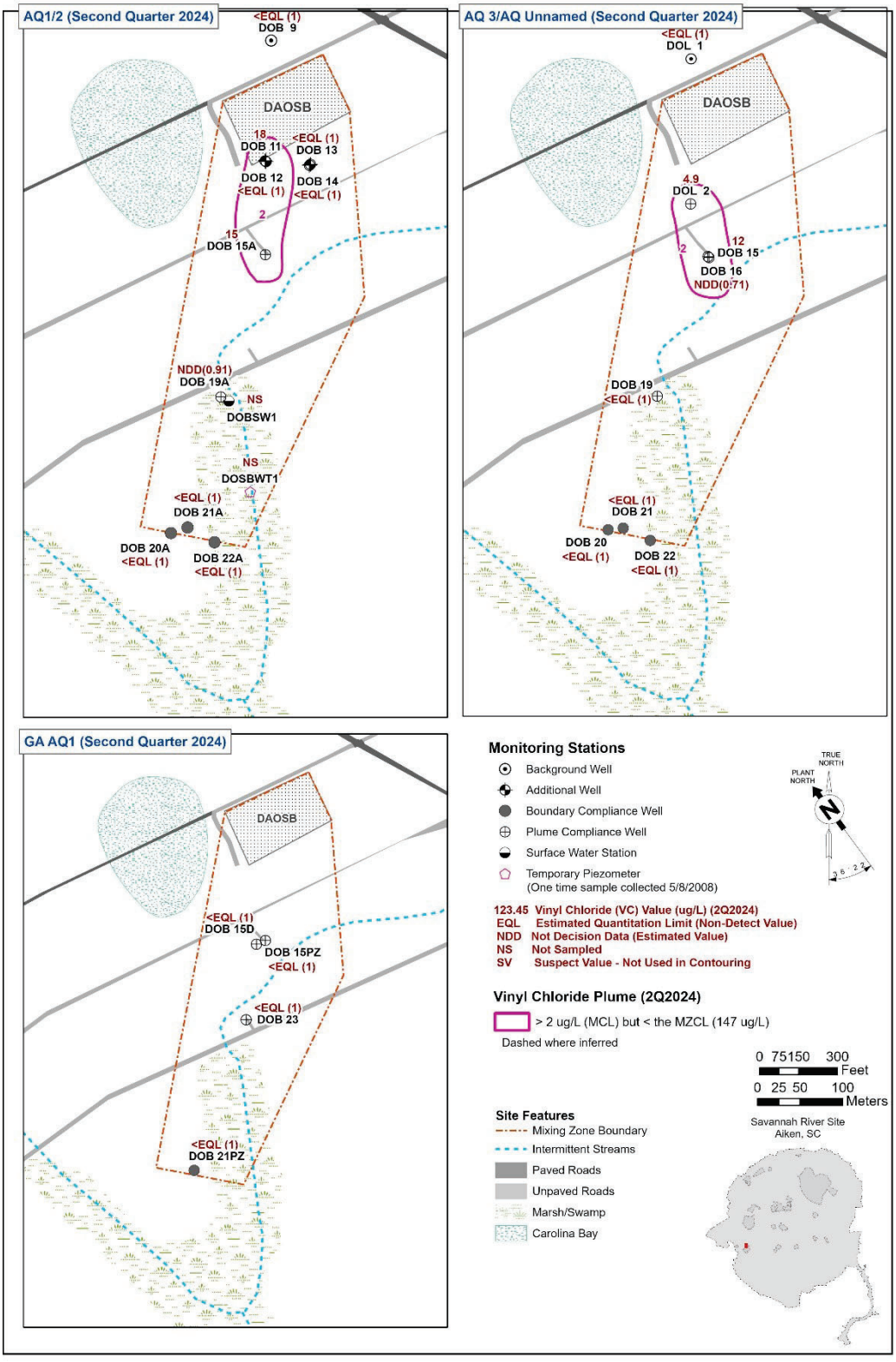

Figure 7. 2024 VC Plume and Concentrations at the DOSB OU

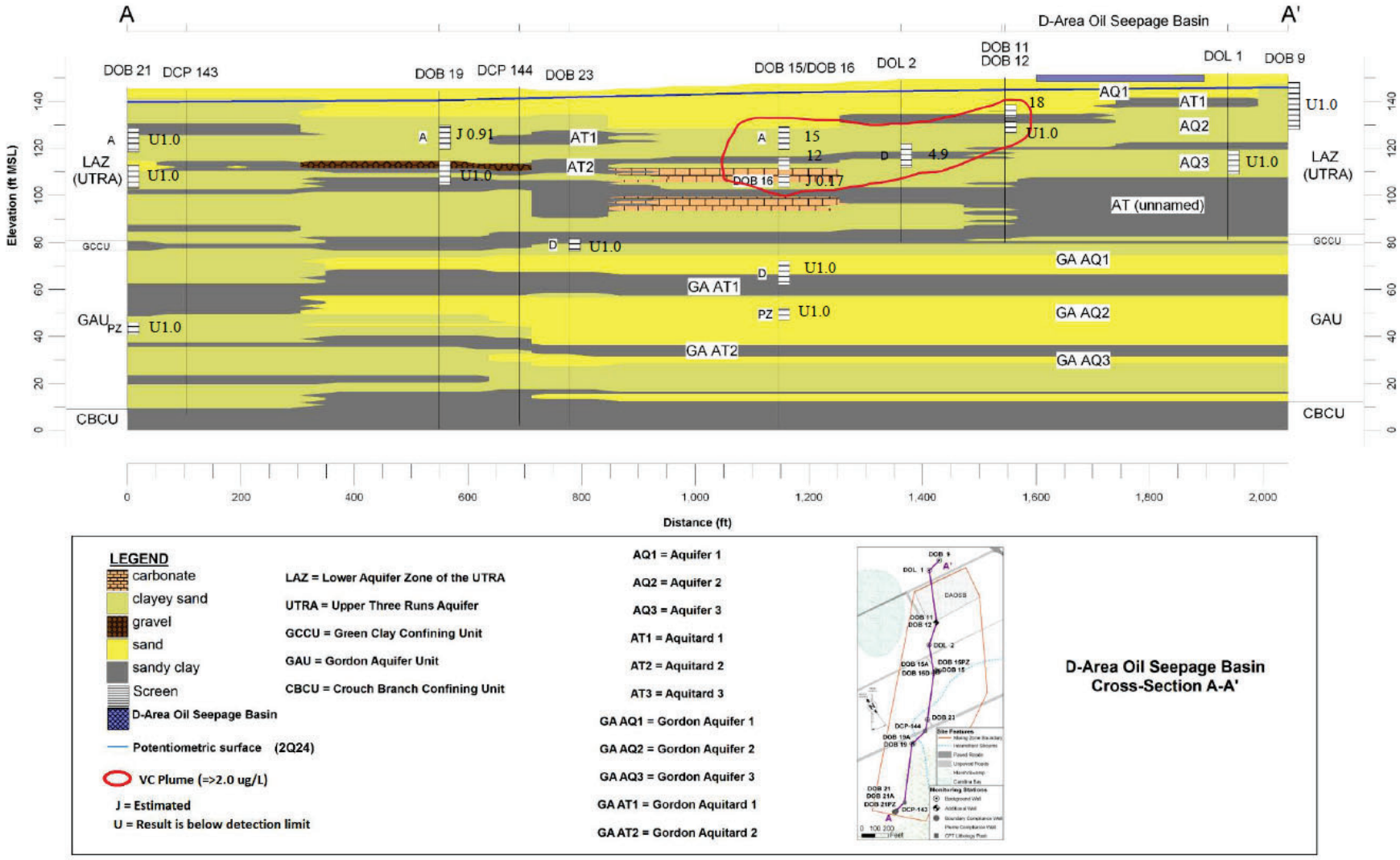

Figure 8. Cross Section A – A' of the DOSB Area with 2024 VC Plume and Results

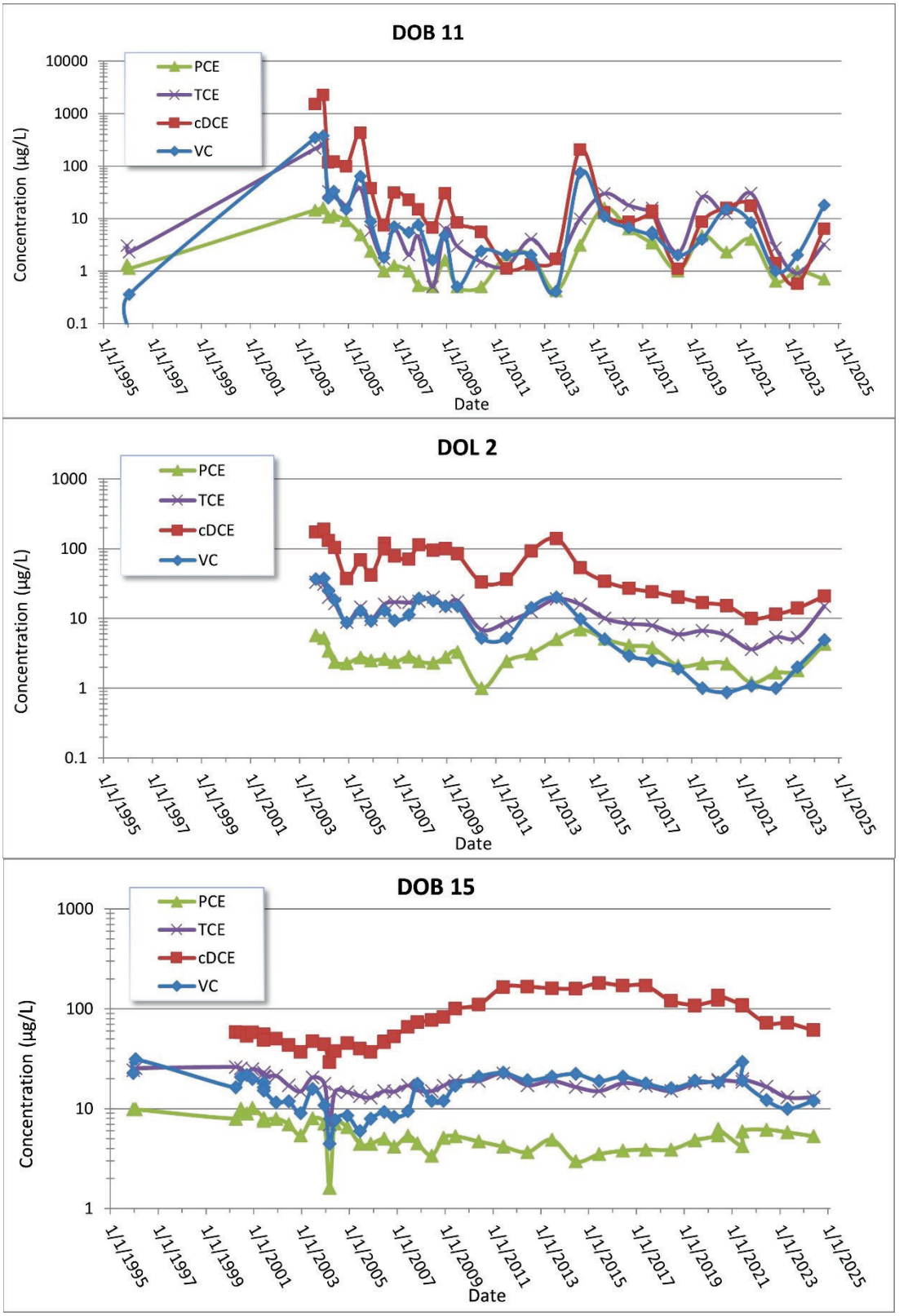

Figure 9. Time Series Plots of PCE, TCE, cDCE, and VC at Additional Well DOB11 and Plume Compliance Wells DOL 2 and DOB 15 at the DOSB OU

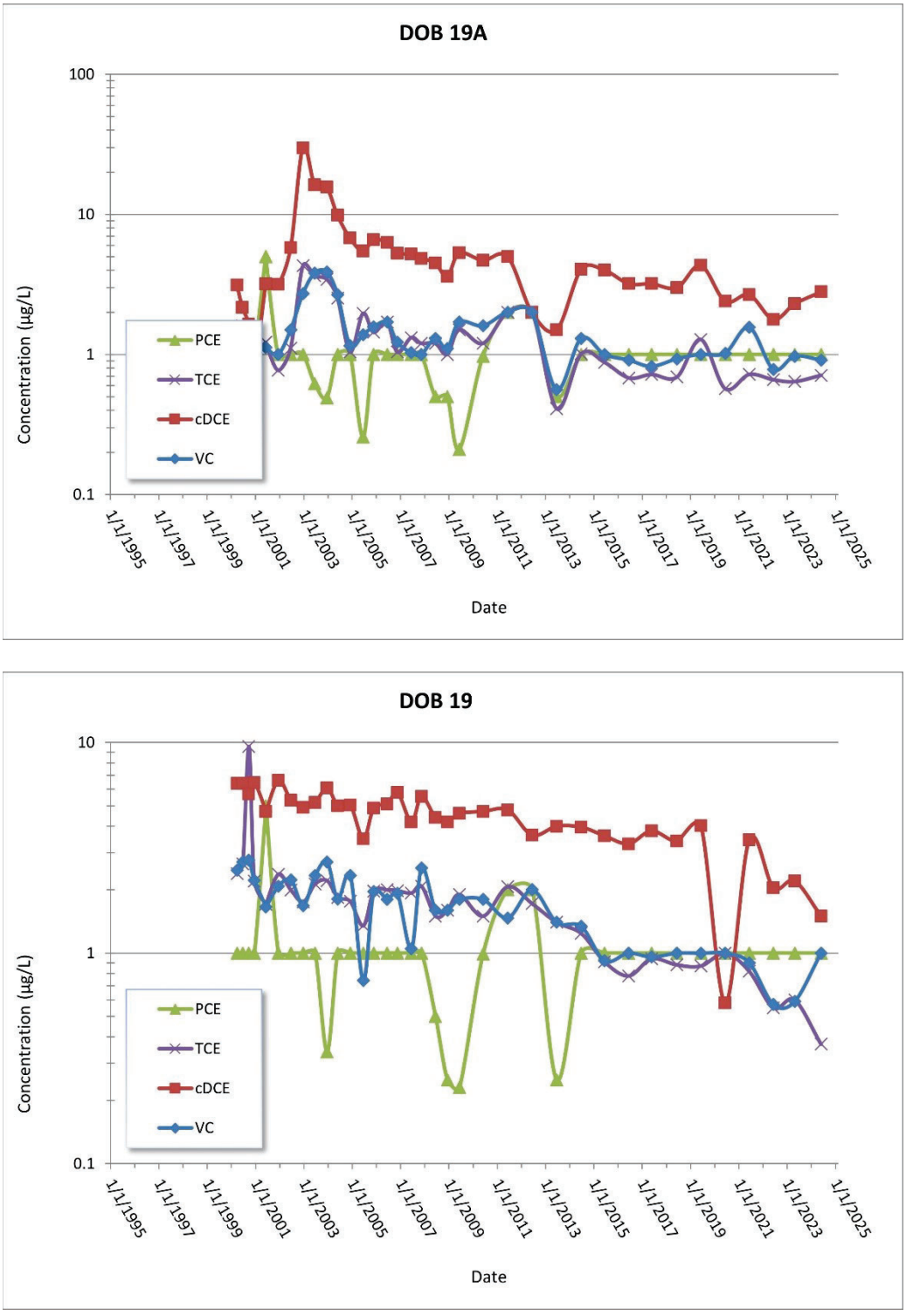

Figure 10. Time Series Plots of PCE, TCE, cDCE, and VC at Plume Compliance Wells DOB 19A and DOB 19 at the DOSB OU

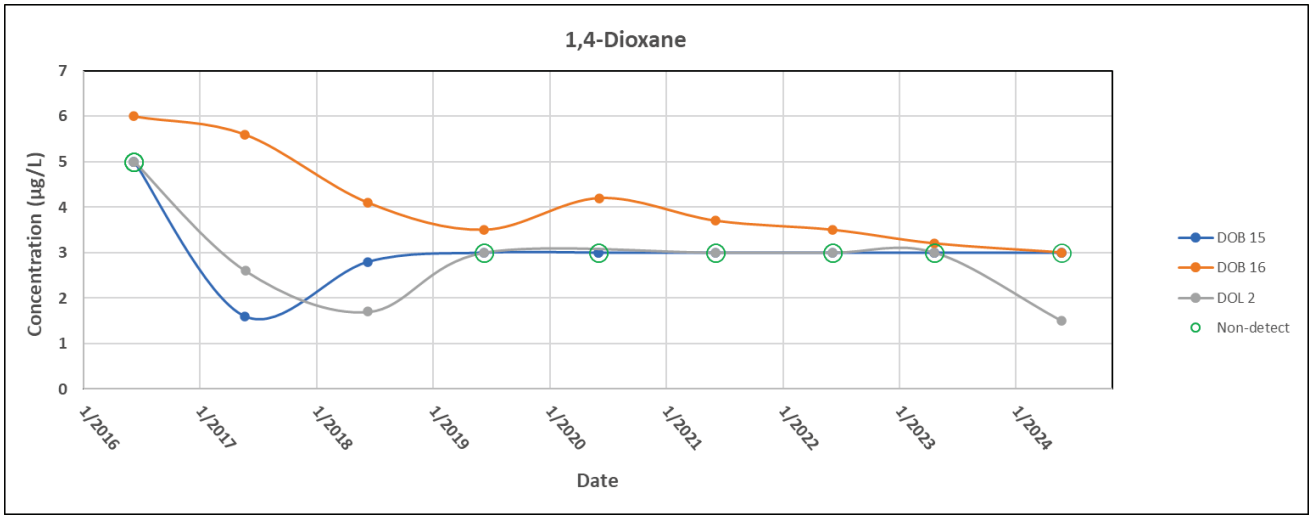

Figure 11. Time Series Plots of 1,4-Dioxane at Wells DOB 15, DOB 16, and DOL 2 at the DOSB OU

Table 1. 2024 DOSB OU Groundwater Mixing Zone Monitoring Results

			Constituent	1,1-DICHLOROETHYLENE	1,4-DIOXANE	BENZENE	CHLOROETHENE (VINYL CHLORIDE)	CIS-1,2-DICHLOROETHYLENE	DICHLOROMETHANE (METHYLENE CHLORIDE)	TETRACHLOROETHYLENE (PCE)	TRICHLOROETHYLENE (TCE)
			Unit	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
		Limit for Plume Compliance and Additional Wells	MZCL	7		5	147	1164	5	78	200
		Limit for Background and Boundary Wells	MCL	7	0.46*	5	2	70	5	5	5
Station	**Well Use**	**Aquifer Zone**	**Sample Collection Date**	Field Comments							
DOB 11	Additional	AQ2	28-May-2024	No Comments	<EQL (1)	NS	1.2	18	6.4	<EQL (2)	[0.7]	3.2
DOB 12	Additional	AQ2	28-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	5.9	<EQL (2)	2.1	4.1
DOB 13	Additional	AQ2	28-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 14	Additional	AQ2	28-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 9	Background Well	AQ1/2	29-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOL 1	Background Well	AQ3	29-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 20	Boundary Compliar	AQ3	28-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 20A	Boundary Compliar	AQ1/2	28-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 21	Boundary Compliar	AQ3	29-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 21A	Boundary Compliar	AQ1/2	29-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 21P	Boundary Compliar	GAU	29-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 22	Boundary Compliar	AQ3	29-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 22A	Boundary Compliar	AQ1/2	29-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 15	Plume Compliance	AQ3	28-May-2024	No Comments	<EQL (1)	<EQL ()	[0.38]	12	61	<EQL (2)	5.3	13
DOB 15A	Plume Compliance	AQ2	28-May-2024	No Comments	<EQL (1)	NS	[0.96]	15	21	<EQL (2)	5.4	18
DOB 15D	Plume Compliance	GAU	28-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	4.2	<EQL (2)	2	2.9
DOB 15P	Plume Compliance	GAU	28-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	<EQL (1)	<EQL (2)	<EQL (1)	<EQL (1)
DOB 16	Plume Compliance	AQ_Unnamed	29-May-2024	No Comments	<EQL (1)	3	<EQL (1)	[0.71]	11	<EQL (2)	<EQL (1)	[0.38]
DOB 19	Plume Compliance	AQ3	28-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	1.5	<EQL (2)	<EQL (1)	[0.37]
DOB 19A	Plume Compliance	AQ2	28-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	[0.91]	2.8	<EQL (2)	<EQL (1)	[0.71]
DOB 23	Plume Compliance	GAU	29-May-2024	No Comments	<EQL (1)	NS	<EQL (1)	<EQL (1)	1.2	<EQL (2)	<EQL (1)	[0.49]
DOL 2	Plume Compliance	AQ3	29-May-2024	No Comments	<EQL (1)	1.5	[0.31]	4.9	21	<EQL (2)	4.3	15
DOBSW1	Surface Water	AQ1/2	NS	Dry	NS	NS	NS	NS	NS	NS	NS	NS

Explanation

MZCL - Mixing Zone Concentration Limit

MCL - Maximum Concentration Limit (*RSL value is used for 1,4-Dioxane)

[##]	EPA Functional Guideline Code of 'J' was applied to the result, indicating an estimated quanity.
<EQL(##)	Constituent was below detection. The sample-specific Estimated Quantitation Limit is in parentheses.
	Result exceeds applicable limit.
	Result exceeds applicable MCL
REJ	Result Rejected.
	Result is less than the applicable limit and without EPA Functional Guidline qualifiers.
NS	Requested to be sampled but was not. See comments as to why not.
Blue Text	Not a required sample analysis.

Table 2. 2024 DOSB OU Natural Attenuation Field Parameters

			SAMPLE COLLECTION DATE	PH	OXIDATION/REDUCTION POTENTIAL (OR	DISSOLVED OXYGEN (DO)	TOTAL ALKALINITY (AS CaCO3)	SAMPLING EVENT WATER ELEVATION	DEPTH TO WATER	TURBIDITY	VOLUME PURGED	WATER TEMPERATURE	FIELD CONDITIONS
			Unit	pH	mV	mg/L	mg/L	ft	ft	NTU	gal	degC	
Station	**Well Use**	**Aquifer Zone**	**day-month-year**										
DOB 9	Background Well	AQ1/2	29-May-2024	5.2	302	4.95	2	142.78	11.35	18.1	4	18	No Comments
DOL 1	Background Well	AQ3	29-May-2024	6.1	258	5.67	8	141.76	12.99	2.4	10	18.7	No Comments
DOB 12	Additional	AQ2	28-May-2024	5.3	205	1.9	5	142.4	10.35	1.8	5	18.5	No Comments
DOB 11	Additional	AQ2	28-May-2024	6.7	170	3.1	94	142.39	9.2	3.5	8	18.5	No Comments
DOB 14	Additional	AQ2	28-May-2024	5.2	175	3.4	3	142.35	10.1	9.8	5	18	No Comments
DOB 13	Additional	AQ2	28-May-2024	5.4	196	3.2	6	142.39	10.21	1.5	6	18.7	No Comments
DOL 2	Plume Compliance	AQ3	29-May-2024	3.6	284	4.37	0	141.96	11.04	1.2	10	17.1	No Comments
DOB 15A	Plume Compliance	AQ2	28-May-2024	5.5	199	4.2	14	141.66	8	1	9	17.8	No Comments
DOB 15	Plume Compliance	AQ3	28-May-2024	4.5	218	2.6	0	141.69	8.9	0.8	10	18.9	No Comments
DOB 16	Plume Compliance	AQ_Unnamed	29-May-2024	6.5	-40	3.97	49	141.11	9.98	5.5	12	17.6	No Comments
DOB 15D	Plume Compliance	GAU	28-May-2024	4.9	245	4.6	0	138.57	11.7	0.7	25	18.9	No Comments
DOB 15PZ	Plume Compliance	GAU	28-May-2024	4.4	181	5.7	0	135.68	14	0.8	29	19.6	No Comments
DOB 23	Plume Compliance	GAU	29-May-2024	5.4	185	3	3	138.01	8.46	0.6	21	18.4	No Comments
DOB 19A	Plume Compliance	AQ2	28-May-2024	6.5	191	3.8	24	139.93	6.63	0.6	8	17.6	No Comments
DOB 19	Plume Compliance	AQ3	28-May-2024	6.6	188	4.1	28	139.9	7.06	0.8	13	18.3	No Comments
DOB 21A	Boundary Compliance	AQ1/2	29-May-2024	4.8	134	2.1	0	139.31	9.68	1	9	17.7	No Comments
DOB 21	Boundary Compliance	AQ3	29-May-2024	7	114	1.9	38	139.28	9.58	0.8	14	19.2	No Comments
DOB 21PZ	Boundary Compliance	GAU	29-May-2024	5.1	193	4.1	8	129.72	19.1	0.7	32	18.4	No Comments
DOB 20A	Boundary Compliance	AQ1/2	28-May-2024	6.1	193	4.4	18	138.81	10.82	1.4	8	17.1	No Comments
DOB 20	Boundary Compliance	AQ3	28-May-2024	6.6	191	4.2	32	138.84	10.84	1.1	14	18.4	No Comments
DOB 22A	Boundary Compliance	AQ1/2	29-May-2024	4.6	254	3.9	0	139.05	8.42	0.3	10	18.2	No Comments
DOB 22	Boundary Compliance	AQ3	29-May-2024	6.4	16	1.4	54	138.98	8.75	0.9	13	19.4	No Comments
DOBSW1	Surface Water	AQ1/2	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	Dry

Explanation:
mV: millivolt
mg/L: milligrams per liter
ft: feet
gal: gallons
degC: degrees Celcius
pH: pondus Hydrogenium; negative log of the activity of $[H]^+$ ions
NTU: Nephelometric Turbidity Unit
CaCO3: Calcium Carbonate

Optimum Range for Reductive Declorination
pH: 6 to 8
ORP: -200 to 50 mV
DO: less than 0.5 mg/L
Alkalinity: greater than 0 mg/L as CaCO3

	Measurement is within range for VOC degradation process
Blue Text	Not a required analysis
	Well clusters are separated by color. Wells are listed in downgradient order and wells within a cluster