



December 18, 2019

Alabama Department of Environmental Management  
1400 Coliseum Boulevard  
Montgomery, AL 36110-2059

ATTENTION: Mr. J.J. Houston  
Groundwater Branch/Land Division

SUBJECT: **RNA CORRECTIVE ACTION PLAN**  
Doc's Grocery  
3737 Roy Webb Road  
Jacksonville, Calhoun County, Alabama  
Facility ID # 13652-015-012698  
UST Incident # UST98-02-07

Dear Mr. Houston:

On behalf of our client, The Nolen Company, Poly, Inc./Spectrum Environmental Services, Inc. (Poly/Spectrum) respectfully submits this Corrective Action Plan under CP42.

Should you have any questions or need additional information, please contact Bob White at (888) 739-0838 or Lyn Buntin (888) 793-4700.

Sincerely,  
**POLYENGINEERING, INC./SPECTRUM ENVIRONMENTAL SERVICES, INC.**

A handwritten signature in blue ink that reads "Jamie D. Cox".

Jamie Davies Cox, P.G.  
Southeast Division Manager  
Spectrum Environmental

A handwritten signature in black ink that reads "James R. (Bob) White".

James R. (Bob) White, P.G.  
Senior Professional Geologist  
Spectrum Environmental

# **CORRECTIVE ACTION PLAN**

Natural Attenuation with Episodic EFR and Air Sparge

## **DOC'S GROCERY**

3737 Roy Webb Road

Jacksonville, Calhoun County, Alabama

Facility ID No. 13652-015-012698

UST Incident No. UST98-02-07

Responsible Party:

The Nolen Oil Company, Inc.

600 Hillyear High Road

Anniston, Alabama 36207

UST Contractor:

Poly, Inc. / Spectrum Environmental Services, Inc. (Poly/Spectrum)

1935 Headland Avenue

Dothan, Alabama 36303

334-793-4700

**August 2019**

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DOC'S GROCERY – JACKSONVILLE, ALABAMA

CERTIFICATION PAGE

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I certify under penalty of law that this Corrective Action Plan and all plans, specifications, and technical data submitted within were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiring of the person or persons who directly gathered the enclosed information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information.



Signature

Name of Alabama Registered Professional Engineer

Bruce A. Bradley

Registration Number

23087

Date

1/6/2020



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8.4.2 *Information to be retained in a bound logbook or sample collection form  
should include: ..... 27*  
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**SECTION 1.0 – UST RELEASE FACT SHEET AND SITE CLASSIFICATION SYSTEM CHECKLIST**

**UST RELEASE FACT SHEET**

**GENERAL INFORMATION:**

SITE NAME: Doc's Grocery  
 ADDRESS: 3737 Roy Webb Road, Jacksonville, Alabama  
 FACILITY I.D. NO.: 13652-015-012698  
 UST INCIDENT NO.: UST98-02-07

**RESULTS OF EXPOSURE ASSESSMENT:**

How many private drinking water wells are located within 1,000 ft. of site?  
 How many public water supply wells are located within 1 mile of the site?  
 Have any drinking water supply wells been impacted by contamination from this release?  
 Is there an imminent threat of contamination to any drinking water wells?  
 Have vapors or contaminated groundwater posed a threat to the public?  
 Are any underground utilities impacted or imminently threatened by the release?  
 Have surface waters been impacted by the release?  
 Is there an imminent threat of contamination to surface waters?  
 What is the type of surrounding population?

-1-
-0-
-0-
{ } Yes {X} No
{ } Yes {X} No
{ } Yes {X} No
{ } Yes {X} No
{ } Yes {X} No
{ } Yes {X} No

Rural Residential and undeveloped

**CONTAMINATION DESCRIPTION:**

Type of contamination at site:  Gasoline,  Diesel,  Waste Oil  
 Kerosene,  Other \_\_\_\_\_

Free product present in wells?  Yes  No Maximum thickness measured:

Maximum BETX concentrations measured in soil: 33.0 mg/kg (MW-5/SB-5) during Secondary Investigation

Maximum BTEX or PAH concentrations measured in groundwater:  
 23.05 mg/L (RW-3) total BTEX (3/21/2019)

ADEM UST Form - 001 (04/22/93)

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**ADEM GROUNDWATER BRANCH  
UST SITE CLASSIFICATION SYSTEM  
CHECKLIST**

Please read all of the following statements and mark either yes or no if the statement applies to your site. If you have conducted a Preliminary or Secondary Investigation, all questions should be answered. Closure site assessment reports may not provide you with all the necessary information, but answer the statements with the knowledge obtained during the closure site assessment.

SITE NAME: Doc's Grocery  
 SITE ADDRESS: 3737 Roy Webb Road,  
Jacksonville, Cherokee County, Alabama  
 FACILITY I.D. NO.: 13652-015-012698  
 UST INCIDENT NO.: UST98-02-07  
 OWNER NAME: Mr. James Nolen  
 OWNER ADDRESS: The Nolen Company 2559 US Highway 78 East  
Anniston, Alabama  
 NAME & ADDRESS OF PERSON COMPLETING THIS FORM: Jamie D. Cox, P.G.  
Spectrum Environmental, Inc.  
85 Spectrum Cove  
Alabaster, Alabama 35007

<i>CLASSIFICATION</i>	<i>DESCRIPTION</i>	<i>YES</i>	<i>NO</i>
<b>CLASS A</b>	<b>IMMEDIATE THREAT TO HUMAN HEALTH, HUMAN SAFETY OR SENSITIVE ENVIRONMENTAL RECEPTOR</b>		
A.1	Vapor concentrations at or approaching explosive levels that could cause health effects, are present in a residence or building.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
A.2	Vapor concentrations at or approaching explosive levels are present in subsurface utility system(s), but no buildings or residences are impacted.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>CLASS B</b>	<b>IMMEDIATE THREAT TO HUMAN HEALTH, HUMAN SAFETY OR SENSITIVE ENVIRONMENTAL RECEPTOR</b>		
B.1	An active public water supply well, public water supply line, or public surface water intake is impacted or immediately threatened.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B.2	An active domestic water supply well, domestic water supply line or domestic surface water intake is impacted or immediately threatened.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B.3	The release is located within a designated Wellhead Protection Area I.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>CLASS C</b>	<b>IMMEDIATE THREAT TO HUMAN HEALTH, HUMAN SAFETY OR SENSITIVE ENVIRONMENTAL RECEPTOR</b>		
C.1	Ambient vapor/particulate concentrations exceed concentrations of concern from an acute exposure, or safety viewpoint.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C.2	Free product is present on the groundwater, at ground surface, on surface water bodies, in utilities other than water supply lines, or in surface water runoff.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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<i>CLASSIFICATION</i>	<i>DESCRIPTION</i>	<i>YES</i>	<i>NO</i>
<b>CLASS D</b>	<b>SHORT TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS</b>		
D.1	There is a potential for explosive levels, or concentrations of vapors that could cause acute effects, to accumulate in a residence or other building.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D.2	A non-potable water supply well is impacted or immediately threatened.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D.3	Shallow contaminated surface soils are open to public access, and dwellings, parks, playgrounds, day care centers, schools or similar use facilities are within 500 feet of those soils.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>CLASS E</b>	<b>SHORT TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS</b>		
E.1	A sensitive habitat or sensitive resources (sport fish, economically important species, threatened and endangered species, etc.) are impacted and affected.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>CLASS F</b>	<b>SHORT TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS</b>		
F.1	Groundwater is impacted and a public well is located within 1 mile of the site.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F.2	Groundwater is impacted and a domestic well is located within 1,000 feet of the site.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F.3	Contaminated soils and/or groundwater are located within designated Wellhead Protection Areas (Areas II or III).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>CLASS G</b>	<b>SHORT TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS</b>		
G.1	Contaminated soils and/or groundwater are located within areas vulnerable to contamination from surface sources.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>CLASS H</b>	<b>SHORT TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS</b>		
H.1	Impacted surface water, stormwater or groundwater discharges within 500 feet of a surface water body used for human drinking water, whole body water-contact sports, or habitat to a protected or listed endangered plant and animal species.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>CLASS I</b>	<b>LONG TERM THREAT TO HUMAN HEALTH, SAFETY, OR SENSITIVE ENVIRONMENTAL RECEPTORS</b>		
I.1.	Site has contaminated soils and/or groundwater but does not meet any of the above-mentioned criteria.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The domestic well within 1,000 feet is no longer in use. The well has not been abandoned, but is not being utilized for domestic drinking water, water for animals, or for irrigation purposes. According to the local residents the well is approximately 70 feet deep.

**Complete the classification evaluation questions listed above. Upon completion, determine the highest rank of the site (A.1 is the highest rank) based on the statements answered with a yes.**

Enter the determined classification ranking:	F.2
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ADEM GROUNDWATER BRANCH  
SITE CLASSIFICATION CHECKLIST (5/8/95)

**SECTION 2.0 - INTRODUCTION**

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**2.1 Executive Summary**

Doc's Grocery is located at 3737 Roy Webb in Jacksonville, Cherokee County, Alabama, at Latitude 33° 53' 18" North and Longitude 85° 44' 36" West. The site is located in the Northeast ¼ of Section 2, Township 13 South, Range 8 East, as depicted on the Piedmont Northwest, Alabama, U.S.G.S. 7.5 minute Quadrangle, 1967, Photorevised 1983 (Figure 1).

Investigative actions, as directed by the Alabama Department of Environmental Management (ADEM) have been conducted at the site since 1995. During these investigations, Benzene, Toluene, EthylBenzene, Xylene, and Methyl tert-butyl ether (BTEX/MtBE) concentrations within the boundaries of the subject site have been reported to be in excess of established Initial Screening Levels (ISLs). Subsequent to an Alabama Risk Based Corrective Action Plan (ARBCA) Assessment of the subject site, certain COCs are in excess of calculated Tier II SSTLs.

Several technologies were evaluated as to applicability and cost effectiveness, considering site-specific conditions at the former Doc's Grocery site. All of the site data was reviewed to determine the most appropriate Corrective Action to be employed at the site. Based on our review of the site data, we are recommending Remediation through Natural Attenuation (RNA) combined with mobile enhance fluid extraction (EFR) and air sparging events. On an as-needed basis, EFRs with air sparging events may prove beneficial to expedite the attenuation of contaminants at the site.

**2.2 Purpose of the Plan**

The purpose of this Corrective Action Plan is to compile and evaluate site data in order to select and implement an effective corrective action methodology that will expedite site cleanup and is protective of potentially impacted receptors. receptors.

**SECTION 3.0 – SUMMARY OF SITE GEOLOGY AND PREVIOUSLY CONDUCT SITE  
ACTIVITIES**

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**3.1 Discussion of Site Geology**

The subject site is located in Northeast Calhoun County and is situated in the Weisner Ridges District of the Alabama Valley and Ridge Physiographic section (Bossong, 1989). The general topography surrounding the site is typified by broad, relatively flat, uplands dissected by well-defined stream valleys.

The subject site is situated in an area where surface gradients are generally to the Southeast. The terrain of the site is relatively flat.

Unconsolidated sedimentary deposits of the Alabama Valley and Ridge Physiographic province underlie the subject site and general site area. Sedimentary deposits occupying the valleys consist of clays, sands, silts, and gravels originating from fluvial deposition or from the weathering of the carbonate bedrock. Northeast-southwest trending ridges that are predominantly composed of Ordovician through Mississippian age Sandstones and Shales divide these valleys.

The bedrock underlying the site is classified as belonging to the Cambrian and Ordovician Age Knox Group Dolomites (Scott, Harris, & Cobb, 1987). The Knox Group Dolomites, consist of light to dark gray, thick-bedded limestone and dolomite, cherty in part. The soils encountered during field activities reflected the underlying geology with the appearance of a grayish, sandy-clay soil with the presence of small to medium sized chert rock fragments.

*3.2.2 Regional Hydrogeology*

The site lies in the recharge zone of the Knox-Shady Aquifers in an area that is designated as susceptible to contamination (Planert and Pritchett, 1989). This aquifer is approximately 3,900 feet thick and is composed of siliceous dolomite in the lower part to fine- to coarse-grained limestone in the upper part. Based on a potentiometric surface map of the Knox-Shady Aquifers prepared in 1989 by C.R. Bossong, the depth to the aquifer is approximately 550-600 feet below surface elevation and the general gradient is to the southwest. There are no springs or wells in the general vicinity of the site being utilized as a public water supply.

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**3.2 Description of Release and Past Environmental History**

Doc’s Grocery currently operates as a grocery store. Previously, the subject property was utilized as a retail gasoline station. These activities ceased in September 1998, subsequent to the closure of three USTs. One 4,000-gallon gasoline UST and two 1,000-gallon USTs were permanently closed by removal on December 23, 1998.

A brief chronology of the recent environmental history at the site is described below.

During the closure of one 4,000-gallon gasoline UST at the subject site in August, 1997, free product was detected within the tank pit. Based on ADEM’s review of the UST Closure Report, the ADEM submitted a REQUIREMENT TO CONDUCT INVESTIGATIVE AND CORRECTIVE ACTIONS in a letter dated March 6, 1998. The location of the closed tank was in close proximity to three additional USTs, which were yet to be closed. Based on the upcoming additional closures at the site, the ADEM agreed to postpone the required Preliminary Investigation activities pending the closure of the additional USTs.

In December 1998, the closure of these additional USTs at the site was performed. Two 1,000-gallon gasoline USTs and one 4,000-gallon UST were closed by removal. The 4,000 gallon tank was located adjacent to the pit where free product was observed in August 1997. During the 1998 UST closure, soil samples were collected from the base and the sidewalls of the tank pit from which the 4,000-gallon tank was removed. These soil samples were reported as below method detection limits (BDL). In a letter dated August 4, 1999, the ADEM granted a “No Further Action” status to the tank pits involved in the 1998 UST closure. The ADEM, however, also stated that the 1997 and 1998 closures “did not adequately satisfy the Preliminary Investigation requirements as per the Department letter dated March 6, 1998.” Groundwater was not sampled during either UST Closure Events as required during a Preliminary Investigation. Therefore, the ADEM, in the letter dated August 4, 1999, notified Nolen Oil Co. of the REQUIREMENT TO CONDUCT A PRELIMINARY INVESTIGATION at the Doc’s Grocery site.

On January 9, 2001 Poly/Spectrum conducted groundwater monitoring event #1, which included the sampling of all wells at the site, except monitoring well MW-4, for the presence and strength of Benzene, Toluene, Ethylbenzene, Xylene (BTEX), and MtBE. Of the nine monitoring wells sampled MW-1, MW-5, MW-9, and MW-10 had at least one chemical of concern (COC) that exceeded the initial screening levels (ISLs) for groundwater at a commercial site. Groundwater Monitoring has been conducted at the site on a tri-annual basis. During the most recent sampling event conducted on March 21, 2019, Benzene concentrations ranged from BDL to 2.80 mg/L (RW-3). Four (4) wells (MW-3, MW-9, RW-1 & RW-3) reported benzene at concentrations that exceeded the site-specific target limits (0.00837 mg/L). MW-1 and MW-4, which historically have elevated Benzene levels, were not sampled during this sampling event. One well (RW-3) exceeded the SSTL for ethylbenzene (1.172 mg/L). No other COCs exceeded the SSTLs.

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On October 22, 2008, Poly/Spectrum personnel mobilized to the site to install three 4-inch, Type II groundwater recovery wells. The objective for the installation of these wells was to utilize them as recovery wells to further enhance the biodegradation and removal of petroleum hydrocarbons within the subsurface. In 2009, EFR Events were introduced at the site to remove dissolved phase petroleum hydrocarbons. The first event on 2/23/2009 removed a calculated total of 130 pounds of petroleum hydrocarbons (21 equivalent gallons of gasoline). Eight-hour EFR events have been conducted at the site twice a year since 2009. The most recent event conducted on December 5, 2018, 22.90 pounds of hydrocarbons were recovered during this event; which equates to approximately 3.72 equivalent gallons of gasoline recovered.

### **3.3 SUMMARY OF PREVIOUS SITE INVESTIGATION RESULTS**

#### *3.3.1 UST Closure*

Based on findings during the permanent closure of one UST at the site in 1997, the Alabama Department of Environmental Management (ADEM) required that a Preliminary UST Investigation be conducted. Pursuant to a request by Nolen Oil Co., the ADEM agreed to the postponing of the Preliminary Investigation until the remaining USTs at the site could be closed. Subsequent to the closure of all remaining USTs at the site, Mr. Nolen received the Notice of Requirement letter from ADEM to conduct a Preliminary Investigation of a gasoline release. Mr. Nolen received this letter on March 6, 1998 along with the Alabama Tank Trust Fund Pre-Approved Cost proposal. Poly/Spectrum was contacted to conduct the investigation and an executed contract and Pre-Approved Cost Proposal were forwarded to the ADEM on August 23, 1999.

#### *3.3.2 Preliminary Investigation*

The objective of the Preliminary UST Preliminary Investigation was to determine whether petroleum hydrocarbon contamination had migrated outside of the immediate tank pit area and furthermore whether the migration, if it had occurred, impacted soils or groundwater. To accomplish this objective, four soil borings were drilled to varying depths below surface to observe and sample subsurface soils. Soil samples were collected on 5-foot centers and were screened in the field using a Heath Model II FID. Based on field observations and the FID readings, certain soil samples were selected to be analyzed for Benzene, Ethylbenzene, Toluene, Xylene (BETX), and MtBE in the laboratory. Field screening of soil samples ranged from 5 to 12,000 parts per million. The results of the laboratory analyses of the selected soil samples indicated that BETX/MtBE values are below the Initial Screening Levels (ISLs) taken from ARBCA Guidance Manual, April 1998.

Each soil boring was converted to a 2-inch Type II groundwater monitoring well. Groundwater samples were collected on August 25, 1999, and analyzed for Benzene, Toluene, Ethylbenzene, and Xylene (BTEX), and MtBE. The results of the BTEX analyses revealed Benzene concentrations lower than laboratory detection limits (BDL) in Monitoring Wells MW-2 and MW-3. Monitoring Wells MW-1 and

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MW-4 exceeded ISLs for Benzene in groundwater. Total BETX concentrations ranged from BDL (MW-3) to 38,900 mg/L (MW-1). Analytical results for MtBE were reported to range from BDL (MW-3) to 4,990 µg/L (MW-4).

Based on the findings of the Preliminary Investigation conducted at Doc's Grocery, the extent of the petroleum hydrocarbon contaminate plume in the groundwater has not been defined. Therefore, an additional assessment was required to further delineate the horizontal and vertical extent of the petroleum hydrocarbon impact in the vicinity of subject site and to recommend appropriate corrective action

### *3.3.3 Secondary Investigation*

The objective of the Secondary UST Investigation was to delineate the petroleum hydrocarbon plume, which was identified during Preliminary Investigation activities. To accomplish this objective, eight soil borings were drilled to depths of 25 feet below surface to observe and sample subsurface soils. One soil boring was drilled to a depth of 38.5 feet below surface. Soil samples were collected on 5-foot centers and were screened in the field using a Heath Model II FID. Based on field observations and the FID readings, certain soil samples were selected to be analyzed for Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX), and MtBE in the laboratory. Field screening of soil samples ranged from 0 to 100 parts per million (SB-9B). The results of the laboratory analyses of the selected soil samples indicate that BTEX/MtBE values are all below the Initial Screening Levels (ISLs) taken from ARBCA Guidance Manual, April 1998.

Each soil boring advanced during the Secondary Investigation was converted to a 2-inch Type II groundwater-monitoring well. Groundwater samples were collected on January 13, 2000, and analyzed for Benzene, Toluene, Ethylbenzene and Xylenes (BTEX), and MtBE. The results of the BETX analyses revealed Benzene concentrations ranging from BDL to 6,600 µg/L (MW-10). Total BETX concentrations ranged from BDL to 19,890 mg/L (MW-10). Analytical results for MtBE were reported to range from BDL to 3,100 µg/L (MW-10).

Based on the findings of the Secondary Investigation, Poly/Spectrum recommended that the implementation of tri-annual groundwater monitoring as well as a Tier I/Tier II evaluation to develop alternative corrective action limits for the site. Upon completion of the Tier I/Tier II evaluation, the ADEM granted approval to conduct an RNA corrective action plan.

### *3.3.4 Groundwater Monitoring Events*

Poly/Spectrum has completed thirty-eight groundwater-monitoring events at the Doc's Grocery site. The field methods and procedures associated with the collection and analysis of the groundwater samples are

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discussed below and are indicative of the methods proposed to be used in subsequent groundwater monitoring events at the subject site.

Prior to the collection of the groundwater samples, the groundwater elevation was determined using an electronic water level indicator. After the water levels were recorded, three volumes of groundwater were purged from each well and the groundwater was allowed to recharge to the pre-purging elevation. Discrete samples of purge water were collected at intervals specific to each well and analyzed using field methods for Dissolved Oxygen, Temperature, pH, Conductivity, and Oxidation-Reduction Potential.

Depths to groundwater measurements were collected from the top of casing. From this data, the potentiometric surface elevation could be calculated. Groundwater samples were collected using disposable bailers and transferred directly from the bailer to laboratory prepared containers. Filled sample containers were given a unique identification number and placed on ice in an insulated container to await shipment to the laboratory. To prevent cross-contamination, new bailer cord was used at each sampling location. Additionally, new disposable sampling gloves were worn at each sampling location and at all times while handling sampling equipment.

A total of ten groundwater samples were collected from six monitoring wells located at the Doc’s Grocery site during the most recent event (3/21/2019) at the site.

The groundwater samples were analyzed for the presence of Benzene, Toluene, Ethylbenzene, and total Xylenes (BTEX) and MtBE using EPA Method 8021. From the data gathered during this event, a Benzene Isoconcentration Map is provided as Figure 3, a BTEX is provided as Figure 4, an MtBE Isoconcentration Map is provided as Figure 5 and a Naphthalene Isoconcentration map is provided as Figure 5.

Poly/Spectrum has compiled historical groundwater elevation and contaminant concentration data from the site. A brief discussion of the historical trends and most recent sampling analysis at the site is provided below:

***Groundwater Elevation***

Groundwater Elevation data has been collected at the site since August 25, 1999. A groundwater elevation map of the most recent sampling event is provided as Figure 2. The widely fluctuating groundwater elevation between monitoring events is most likely attributed to precipitation trends. During the most recent event, groundwater elevation data was obtained from monitoring wells MW-3, MW-5, MW-8, MW-9, MW-10, MW-12, MW-13, RW-1, RW-2 and RW-3. During the most recent event, the groundwater elevations showed a significant increase all wells averaging 8.07 feet per well.

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***Benzene Concentrations***

Benzene data have been collected from the site since August 25, 1999. Monitoring Wells MW-2, MW-5, MW-8, MW-12, MW-13 and RW-2 have consistently been BDL for the last several groundwater sampling events. During the most recent event, Benzene concentrations ranged from BDL to 2.80 mg/L (RW-3). Four (4) wells (MW-3, MW-9, RW-1 & RW-3) reported benzene at concentrations that exceeded the SSTL (0.00837 mg/L). MW-1 and MW-4, which historically have elevated Benzene levels, were not sampled during this sampling event. Historically, monitoring wells have shown fluctuating benzene concentration trends. During this event, benzene concentrations decreased in RW-1 and MW-10; but increased in MW-3, MW-9 and RW-3.

***Toluene Concentrations***

Toluene concentrations have been collected from the site since August 25, 1999. Monitoring Wells MW-2, MW-5, MW-8, MW-12, MW-13 and RW-2 have consistently been BDL for the last several groundwater sampling events. During the most recent sampling event, toluene concentrations ranged from BDL to 9.21 mg/L (RW-3). Two wells (RW-1 and RW-3) exceeded the SSTL for toluene (1.67 mg/L).

***Ethylbenzene Concentrations***

Ethylbenzene concentrations have been collected from the site since August 25, 1999. Monitoring Wells MW-2, MW-5, MW-8, MW-12, MW-13 and RW-2 have consistently been BDL for the last several groundwater sampling events. Ethylbenzene concentrations during the most recent sampling event ranged from BDL to 2.12 mg/L (RW-3). One well (RW-3) exceeded the SSTL for ethylbenzene (1.172 mg/L).

***Xylene Concentrations***

Xylene concentrations have been collected from the site since August 25, 1999. During the most recent sampling event, xylene concentrations ranged from BDL to 8.92 mg/L (RW-3). No wells contained xylene at concentrations that exceeded the SSTL (16.744 mg/L). Historically, all monitoring wells have not exceeded the SSTLs allowable groundwater concentrations at source protective of the point of exposure. During the most recent sampling event, xylene concentrations ranged from BDL to 8.92 mg/L (RW-3). No wells contained xylene at concentrations that exceeded the SSTL (16.744 mg/L).

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***MtBE Concentrations***

MtBE data has been collected at the site since August 25, 1999. During the most recent sampling event, MTBE concentrations ranged from BDL to 0.00958 mg/L (MW-9). No wells contained MTBE concentrations that exceeded the SSTL (0.033 mg/L).

***Naphthalene Concentrations***

Naphthalene data has been collected at the site since November 5, 2014. During this sampling event Naphthalene concentrations ranged from BDL to 0.444 mg/L (RW-1). Two wells (MW-3 and RW-1) contained Naphthalene at concentrations that exceeded the SSTL (0.033 mg/L).

***Intrinsic Well Data***

Intrinsic well data, which includes Nitrate, Ferrous Iron, and Sulfate was only collected at the site from 1/23/2007 to 6/28/2008 (five sampling events). During that time, Nitrate concentrations ranged from BDL to 5.82 mg/L (MW-10), Ferrous iron concentrations ranged from BDL to 72 mg/L (MW-4), and Sulfate concentrations ranged from BDL to 35.8 mg/L (MW-3).

**3.4 Summary of ARBCA Report**

***3.4.1 TIER I ASSESSMENT***

The Tier I ARBCA Assessment, led to the following conclusions:

- The site has been adequately investigated and characterized.
- There is no free product at the site nor have any utilities been threatened.
- The groundwater plume is stable or shrinking.
- On site groundwater concentrations are not protective of current and reasonable future on-site receptors.
- On site soil concentrations are protective of current and reasonable future on site receptors.
- Off-site soil and groundwater concentrations are protective of current and reasonable future off-site receptors.

***3.4.2 TIER II ASSESSMENT***

The Tier II ARBCA Assessment, led to the following conclusions:

- On site Benzene, Ethylbenzene, and MtBE groundwater concentrations exceeded the allowable groundwater concentrations at source, protective of point of exposure.



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The results from the Tier I and Tier II Risk-Based Corrective Action Assessment for the site are important and were used to design the Corrective Action Plan and to establish remedial goals protective of human health and the environment. A summary of the Tier II SSTLs protective of human health and the environment for all receptors, chemicals of concern, and routes of exposure are provided in the attached Tables (page 3).

*3.4.3 SUMMARY OF WELLS EXCEEDING SSTL'S*

During the most recent sampling event conducted on March 21, 2019 groundwater concentrations for Benzene in Monitoring well MW-3, MW-9, RW-1 and RW-3 exceeded the SSTLs developed for the site. MW-1 and MW-4, which historically have elevated Benzene levels, were not sampled during this sampling event. Also, groundwater concentrations of Toluene, Ethylbenzene, and Naphthalene in monitoring well RW-1 exceeded the SSTL. Lastly, RW-3 exceeded the SSTL developed for Toluene.

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**Section 4.0 - Rational for Selection of Remediation by Natural Attenuation**

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**4.1 Site Characterization**

Poly/Spectrum conducted Preliminary and Secondary Investigations and groundwater monitoring at the site. Based on the evaluation of data collected from the site, the horizontal and vertical extent of soil and groundwater impact has been delineated. Since the previous Enhanced Fluid Recovery (EFR) Events have recovered a great deal of hydrocarbon it is recommended that EFRs continue at the site. Episodic Air sparging in conjunction with the EFR events is a viable method for corrective action at the Doc's Grocery site to expedite the cleanup time. Additionally, we would like to increase the frequency of EFR/Air Sparge Event and groundwater monitoring to quarterly.

**4.2 Site Remedial Goals**

As stated previously, Tier II SSTLs are provided in the attached Tables (page 3).

**4.3 Evaluation of Plume Status**

As of the latest groundwater sampling event, the plume appears to be relatively unchanged from the last four sampling events. The plume appears to be relatively stable at the present time.

**4.5 Comparison of Site Remedial Goals to Estimated RNA Performance**

Evaluating the stage(s) that Natural Attenuation is occurring at the site can be extremely useful in evaluating the remedial approach. However, the natural attenuation data collected at this site during groundwater monitoring events proved that Natural Attenuation alone was not a time effective method of remediating groundwater at this site. EFR events were scheduled in advance of sampling in order to monitor the effectiveness of the events. Although EFR events have recovered additional contaminant mass, reduction of contaminants is not occurring at the rate desired.

**4.6 No Active Restoration (Natural Attenuation)**

*4.6.1 Natural Attenuation*

Attenuation refers to the reduction/weakening in force, strength, value, or amount; to lessen density of; to dilute or rarefy; or to make less virulent. Attenuation is also a descriptive term of general processes and observed effects. There are two main mechanisms by which natural attenuation occurs: non-destructive and destructive mechanisms.

Non-destructive mechanisms result in the reduction of groundwater contaminants with no loss of mass from the system. Examples of non-destructive natural attenuation are dispersion/dilution, sorption

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(contaminant mass transferred to aquifer solids), and volatilization (contaminant mass transferred to air phase).

Destructive mechanisms result in the reduction of groundwater contaminants that result in a mass loss of contaminants from the system. Examples of destructive natural attenuation are biodegradation (aerobic, anaerobic, and cometabolism), abiotic oxidation/reduction reactions, and hydrolysis.

Biodegradation involves biologically mediated oxidation/reduction reactions, which is fundamentally an electron transfer process. Electrons are transferred from more reduced compounds to more oxidized compounds (e.g.  $\text{Fe}^{3+}$  to  $\text{Fe}^{2+}$ ). The energy released during this process is used by microbes to sustain metabolism and growth. Electron donors are what the microbes eat and electron acceptors are what the microbes' breath. Examples of electron donors are naturally occurring carbon or groundwater contaminated with hydrocarbons. Examples of naturally occurring electron acceptors would be  $\text{O}_2$ ,  $\text{NO}_3$ ,  $\text{Mn}^{4+}$ ,  $\text{Fe}^{3+}$ ,  $\text{SO}_4$ , and  $\text{CO}_2$ .

Natural attenuation is occurring at all groundwater contaminated sites to some extent. The question is not whether natural attenuation is occurring, but whether natural attenuation is occurring to the degree needed to meet remedial goals in a workable timeframe. Natural attenuation can result in complete mineralization of contaminants to innocuous products, not just transfer compounds to another phase or location. This remedial option allows continuing use of site infrastructure, which may be more cost effective than engineered remediation systems.

Although there are many positive factors of natural attenuation, the following are some drawbacks:

- Highly subject to natural and anthropogenic changes in local hydrogeologic and hydrogeochemical conditions (groundwater gradients/velocity, changes in electron donor/acceptor concentrations),
- Degradation can result in toxic byproducts,
- Aquifer heterogeneity may complicate site characterization,
- Time frame for completion may be prohibitively long,
- Should not be considered a presumptive remedy,
- May not be appropriate for all compounds of concern at a site, and
- Cannot be *assumed* to be a viable option for a site as a sole source remedial methodology.

Depending on the contaminant of concern, Natural Attenuation will progress as follows:

*Aerobic degradation*→*Nitrate-Reducing*→*Manganogenic*→*Ferrogenic*→*Sulfate-Reducing*→*Methanogenesis*

In order to demonstrate the effectiveness of Natural Attenuation as a remedial alternative, one must do the following:

- Compile and review available site data,

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- Characterize the site,
- Refine the site conceptual model,
- Evaluate Natural Attenuation,
- Prepare long-term monitoring plan,
- Present results to regulatory authority, and
- Monitor and evaluate effectiveness.

*4.6.2 Applicability to the Doc's Grocery Site*

Since 1999, Poly/Spectrum has characterized the site to the extent possible and assimilated all data. Based on the limited natural attenuation data already collected, it appears that natural attenuation is not occurring to the degree needed to meet remedial goals in a workable timeframe at the site, but should be used as a viable remedial approach with augmentation. In addition to the RNA approach, Poly/Spectrum is recommending that EFR events be combined with air sparging techniques. Monitoring Wells RW-1 and RW-3 would be utilized as extraction points and four air sparge points would be installed within the radius of influence of RW-1 and RW-3.

The air sparge wells will be completed with a minimum of 5 feet of 0.010" slotted PVC screen and sealed with a threaded bottom cap. The air sparge wells will extend to a depth at least five feet below the lowest recovery well. The top of the screen will be set below the estimated low water elevation in the vicinity of the proposed well. PVC riser will be extended above the screen to the ground surface. All connections between well materials will be screw threaded. The annular space between the borehole wall and well screen will be backfilled with 20-40 grade silica sand as a filter pack and will be extended to at least one foot above the top of the PVC screen elevation and below the estimated low water elevation. A hydrated bentonite plug will be extended from the top of the filter pack a thickness of at least 2 feet. The remaining annular space will be backfilled with a 5-10% bentonite grout slurry using tremie methods. A well schematic is provided as Attachment 3, and a proposed air sparge well location map is provided as Figure 6 (Attachment 1).

Poly/Spectrum is proposing 24-hour EFRs with air sparging events to be conducted at quarterly intervals. An RNA groundwater monitoring event will be conducted within 14 days after each EFR with air sparge event.

*4.6.3 EFR Events*

In addition to the RNA approach, Poly/Spectrum is recommending that EFR with air sparging events be conducted at the site. Poly/Spectrum is proposing 24-hour EFR with air sparging augmentation events be conducted meet SSTLs developed for the site in a workable timeframe. The groundwater monitoring wells proposed for these EFR events are wells RW-1 and RW-3 is to be used as extraction wells. These wells

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have demonstrated the highest contaminant concentrations during the most recent sampling events conducted at the site. Other wells, as site conditions dictate, will be used to monitor drawdown during the EFR events. The purpose of the EFR events will be to aggressively reduce source contaminants. Essentially, the EFR events are proposed to effectuate (1) the removal of free product and petroleum contaminated groundwater; (2) “strip” hydrocarbons from the surface of the soil in the source area; and (3) introduce oxygen into the subsurface of the source area to enhance the biological reduction of contaminants. Three 24-hour events, if deemed necessary, are proposed to be conducted during the initial year of quarterly RNA sampling to aggressively attack the source zone. After the initial source reduction, RNA is being proposed to monitor site contaminant trends until the SSTL’s are attained.

**SECTION 5.0 – GROUNDWATER MONITORING PROGRAM**

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**5.1 Selected Wells to be Monitored**

Based on historical data collected at the Doc’s Grocery site, Poly/Spectrum proposes to collect groundwater samples during the proposed RNA groundwater monitoring events from the following groundwater monitoring wells:

MW-1, MW-2, MW-3, MW-4, MW-5, MW-8, MW-9, MW-10, MW-12, MW-13, RW-1, RW-2 and RW-3

MW-1, MW-3, MW-4, MW-9, RW-1 and RW-3 are located within the contaminant plume, with all remaining wells being located outside of the plume or at the edge of the plume during the last sampling event conducted at the site and have historically been BDL or recorded small concentrations of contaminants, but are selected as RNA Monitoring Wells due to their upgradient, crossgradient or downgradient positions relative to the source area.

**5.2 Frequency of Monitoring**

Upon approval from the ADEM to implement the proposed Remediation by Natural Attenuation Corrective Action Plan, the groundwater shall be monitored at the site as follows:

- Four times per year for the first year with EFR/Air Sparge Event; and
- Four times per year, or less frequent based on site trends, for years 2+ with the option of conducting three 24-hour EFR events if deemed necessary.

**5.3 Duration of Monitoring**

Based on historic declines in contaminant levels at the site and the fact that multiple EFR with air sparging events are proposed to enhance the remedial process, it is estimated that it will take between one and three years to reach the SSTL’s calculated for the site.

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**5.4 Proposed Monitoring Parameters and Methods**

Each well will be sampled and analyzed for the presence of Benzene, Toluene, Ethylbenzene, and total Xylenes (BTEX) and MTBE using EPA Method 8021.

**5.5 Field Methods and Procedures for Sampling**

Prior to the collection of the groundwater samples, the groundwater elevation will be determined using an electronic water level indicator. After the water levels are recorded, groundwater will be purged from each well and the groundwater will be allowed to recharge to the pre-purging elevation.

Depths to groundwater measurements will be collected from the top of casing. From this data, the potentiometric surface elevation will be calculated and graphically depicted on the potentiometric surface map to be included as an attachment to the Natural Attenuation Monitoring Report.

Discrete samples of purge water will be collected at intervals specific to each well and analyzed using field methods for Temperature, pH, Conductivity, Dissolved Oxygen, and Oxidation-Reduction Potential (ORP). Purging will continue until three well volumes and the parameters of temperature (to within 0.5 °C), pH (to within 0.1 s.u. units) and conductivity (to within 10%) have stabilized. Samples for dissolved oxygen will be analyzed in the field using an YSI dissolved oxygen Meter and flow through cell, and measured in parts per million. The calculation for determining the appropriate volume of purge water to be removed from each monitoring well is:

$$V = 0.041 d^2 h$$

Where:

V = Volume of water in gallons  
h = depth of water in feet  
d = diameter of well in inches

Samples for Oxidation Reduction Potential will be analyzed in the field using a portable field meter and measured in mV.

Groundwater samples will be collected using disposable bailers and transferred directly from the bailer to the laboratory prepared containers. Filled sample containers will be given a unique identification number and placed on ice in an insulated container to await shipment to the laboratory. To prevent cross-contamination, new bailer cord will be used at each sampling location. Additionally, new disposable sampling gloves will be worn at each sampling location and at all times while handling sampling equipment.

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Groundwater purged from the wells during sampling will be temporarily stored on site in 55 gallon drums labeled as non-hazardous petroleum contact water. The purge water will be removed and disposed by the EFR contractors during the next event following sampling. If the next EFR event will be more than 90 days, the water will be treated using Granular Activated Carbon (GAC), then discharged onsite.



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**Section 6.0 – Reporting**

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Subsequent to each quarterly groundwater-monitoring event, Poly/Spectrum will complete the ADEM's "Natural Attenuation Monitoring Report (NAMR)" forms for review by the ADEM. The NAMR for Doc's Grocery will contain the following information:

Section 1 - Site Summary

Section 2 - Site Maps

Section 3 - Well Inventory Table

Section 4 - History of Sampling

Section 5 - Sampling Methodology

Section 6 - Historical Monitoring Well Chemicals of concern Data

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data

Section 8 - Groundwater Elevation Data

Section 9 - Monitoring Costs v. Time

Each NAMR submittal will be provided on the most recent forms posted on the ADEM website. As the form is changed or updated by the ADEM, the new forms will be utilized.

Natural attenuation parameters will be plotted and graphed to determine trends in the data. If natural attenuation parameters do not indicate that attenuation by natural conditions is progressing at a reasonable rate, alternate corrective actions will be reviewed. EFR events are proposed as part of the CAP, if deemed necessary of the initial year of quarterly monitoring for the site and are anticipated to reduce contaminant concentrations initially. If trends do not continue, indicating natural attenuation is effective, procedures that are more aggressive will be considered.

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**SECTION 7.0 – SCHEDULE OF IMPLEMENTATION**

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Upon approval by ADEM of the plan herein submitted, the following estimated plan on implementation is anticipated:

90 Days from approval	Initial EFR + Air Sparge event
110 Days from approval	Initial RNA Groundwater sampling event
150 Days from approval	Initial NAMR Report Submittal
180 Days from approval	Second EFR + Air Sparge event
200 Days from approval	Second RNA Groundwater sampling event
240 Days from approval	Second NAMR Report submittal
270 Days from approval	Third EFR + Air Sparge event
290 Days from approval	Third RNA Groundwater sampling event
330 Days from approval	Third NAMR Report submittal
360 Days from approval	Fourth EFR + Air Sparge event
380 Days from approval	Fourth RNA Groundwater sampling event
420 Days from approval	Forth submittal NAMR Report

Generally, the above schedule for groundwater sampling and reporting will be repeated in subsequent years until the SSTL's are achieved. Additional EFR events are not presently anticipated but may be considered in the future based on the response to the first years events and the contaminant decline curve.

**SECTION 8.0 – QUALITY ASSURANCE / QUALITY CONTROL PLAN**

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**8.1 QA/QC Requirements**

Quality Assurance/Quality Control procedures and EPA required decontamination procedures will be utilized to ensure sample quality. It is the responsibility of the field sampling staff to assure that the samples collected arrives at the laboratory in the appropriate container, with the appropriate preservative, and within the holding times for each analysis.

**8.2 Sample Containers & Preservation**

All samples should be placed in the appropriate containers and preserved as recommended in Table 1 of Appendix G of the Alabama Investigation and Remediation Guidance document, latest revision (September 2005). All sample containers should be new, pre-cleaned or properly decontaminated with the appropriate certification.

**8.3 Sample Handling**

The effectiveness of sample handling techniques will be measured by collecting duplicates and trip blank samples. A description of these Quality Control techniques is described below:

*8.3.4 Duplicate Sample*

The purpose of a duplicate sample is to estimate the variability of a given characteristic or contaminant associated with a population. Poly/Spectrum are proposing to collect one blind duplicate sample for every 10 samples collected during any given sampling event.

*8.3.5 Trip Blanks*

A sample that is prepared prior to the sampling event in the actual container and is stored with the investigative samples throughout the sampling event. They are then packaged for shipment with the other samples and submitted for analysis. At no time after their preparation are trip blanks to be opened before they reach the laboratory. Trip blanks are used to determine if samples were contaminated during storage and/or transport back to the laboratory (a measure of sample handling variability resulting in positive bias in contaminant concentration). If samples are to be shipped, trip blanks are to be provided with each shipment but not for each cooler.

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## **8.4 Sample Identification**

### *8.4.1 Labeling*

Samples collected for specific field analysis or measurement data should be recorded directly in bound field logbooks, sample collection forms, or recorded directly on the Chain-of-Custody Record. Samples collected for laboratory analyses should include sample labels or sample tags. The following information should be written on the sample labels or tags using waterproof, non-erasable ink:

- (a) Project number;
- (b) Field identification or sample station number;
- (c) Date and time of sample collection;
- (d) Designation of the sample as a grab or composite;
- (e) Type of sample (water, wastewater, leachate, soil, sediment, etc.);
- (f) The preservative used (if any); and
- (g) The general types of analyses to be performed.

### *8.4.2 Information to be retained in a bound logbook or sample collection form should include:*

- (a) Project number;
- (b) Field identification or sample station number;
- (c) Date and time of sample collection;
- (d) Designation of the sample as a grab or composite;
- (e) The signature of either the sampler(s) or the designated sampling team leader and the field sample custodian;
- (f) Whether the sample was preserved or unpreserved, and if preserved, identify the preservative used;
- (g) The general types of analyses to be performed;
- (h) All field measurements collected during the purging of monitoring wells (pH, Specific Conductivity, Temperature, and Turbidity);
- (i) Water levels and total well depths measured during the sampling event; and,
- (j) Any relevant comments (such as readily detectable or identifiable odor, color, or known toxic properties).

## **8.5 CHAIN-OF-CUSTODY**

The original or copies of the chain-of-custody forms should be submitted with all the original laboratory reports to the Department. If copies are submitted, the copies should represent the same data and

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information, which are present on the original chain-of-custody forms. All information on the chain-of-custody forms should be recorded in a legible manner. Chain-of-custody forms should originate in the field immediately upon sampling soils or groundwater. The chain-of-custody forms should stay with the samples at all times until properly relinquished to the laboratory for analysis. Information which should be present on all chain-of-custody forms include the following:

1. Site name and address.
2. Date and time of sampling of each sample.
3. Sample identification numbers.
4. Name of sampler(s).
5. Analytical laboratory to be utilized.
6. Analytical methods to be used.
7. Type of sample (*i.e.*, composite, grab, etc.).
8. Matrix sampled (soil, water sludge, etc.).
9. Number and type of sample container.
10. Remarks regarding sampling, if applicable.
11. Preservatives used for each sample (also indicate if placed on ice).
12. Personnel relinquishing samples; times and dates.
13. Personnel receiving samples; times and dates.

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**FIGURES**

**CAP – NATURAL ATTENUATION WITH EPISODE EFR & AIR SPAGE  
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**TABLES**

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**HEALTH & SAFETY PLAN**



## UST Corrective Action Site Health & Safety Plan

### A. Project Identification and Schedule

Client: James Nolen / ADEM Telephone No.: \_\_\_\_\_

Planned Start Date: 9/2019 Expected Completion Date: 9/2022

Site Name: Doc's Grocery

Site Address: 3737 Roy Webb Road, Jacksonville, Calhoun County, Alabama

### B. Planned Activity

<input type="checkbox"/> New Tank Installation	<input type="checkbox"/> Tank/Piping Upgrade
<input type="checkbox"/> Tank Removal and Soil Sampling	<input type="checkbox"/> Tank Abandonment and Soil Sampling
<input type="checkbox"/> Carbon Treatment	<input type="checkbox"/> DPVE
<input type="checkbox"/> Thermal Oxidation	<input checked="" type="checkbox"/> Other (describe) RNA / MEME

### C. Emergency Telephone Numbers and Addresses

Make sure:

- You know where the nearest telephone is located
- You have change if it's a pay phone, or
- The battery is charged or you have an adapter if it's a cellular phone
- Attach a map to plan showing route to nearest hospital or emergency facility.

Fire/Explosion Telephone: 911

Leak/Release Telephones: ADEM 334-271-7700  
CHEMTREC 800-424-9300

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Medical

Jacksonville Medical Center  
1519 Pelham Road South  
Jacksonville, Alabama  
(256) 435-4970

Utilities

Note: Alabama One Call 1-800-292-8525 “Call Before You Dig” will be notified prior to any underground investigations and are responsible for locating the utilities listed below:

Electric	Telephone: _____
Gas	Telephone: _____
Water	Telephone: _____
Sewer	Telephone: _____
Telephone	Telephone: _____
TV Cable	Telephone: _____

**D. Job Functions**

- Project Manager:** Oversees planning, scheduling and excavation of project; meets with the owner; serves as the contact person for all public media.
- Project Supervisor:** Oversees the whole project on-site; is responsible for quality assurance/quality control; may perform sampling and monitoring.
- Safety Officer:** Implements site safety plan; authorized to make changes, if necessary; trains on-site personnel in safety procedures.
- Science Advisor:** Directs and coordinates scientific studies, sample collection, field monitoring, analysis of samples and interpretation of results; recommends remedial action plans and corrective actions; provides technical guidance to project manager.

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Extraction Truck	Responsible for hook-up of equipment, operation of equipment, and transporting fluids off site for disposal. Operator must review, sign and comply with this plan.
Technician:	Responsible for O & M of site equipment; collecting samples; site housekeeping.

### **E. Site Description**

Provide directions that are sufficiently detailed so a person unfamiliar with the site can get here by following these directions.

Go east on Interstate 20 towards Atlanta. Take the AL-21 exit 185 towards Oxford/Anniston. Turn left onto Quintard Drive/AL-21 North/Jacksonville State University Highway and continue to follow for 18 miles. Turn Left onto CR-19/Roy Webb Road and site is 3.8 miles on CR-19/Roy Webb Road on the left.

### **F. Release History**

- No evidence of a tank leak or soil contamination
- Suspected or known leak or soil contamination.
- Suspected or known ground-water contamination.

### **G. Weather Conditions**

Note and record in a daily field log the general weather conditions at the site, including the wind direction and the wind speed.

### **H. Security On-Site**

Identify the edge of the work area with, for example, a 4-ft. safety barricade, emergency tape or safety cones, post signs stating “No Smoking” and “Do Not Enter” around the perimeter. Only personnel activity involved in the project should be allowed inside the work area.

## Chemical Hazards

List all chemicals present on the site. Attach Material Safety Data Sheets (MSDS).

1.    BTEX, MtBE \_\_\_\_\_
2.    HCl (preservative in VOA vials) and ferrous iron bottles
3. \_\_\_\_\_
4. \_\_\_\_\_

## I. Potential Health and Safety Hazards

- |   |   |
|---|---|
| <u>  X  </u> Fire/explosion                   | <u>  X  </u> Noise  |
| <u>      </u> Excavation cave-ins             | <u>  X  </u> Underground utilities  |
| <u>      </u> Trips and falls                 | <u>      </u> Oxygen deficiency   |
| <u>      </u> Confined space entry            | <u>  X  </u> Heat/cold  |
| <u>      </u> Falling objects from backhoe    | <u>  X  </u> Biological hazards<br>(poisonous plants,<br>snakes, rodents) |
| <u>      </u> Backhoe falling into excavation | <u>  X  </u> Eye hazards<br>(sample splashing;<br>high pressure lines)    |

## J. Personal Protective Equipment (PPE)

- |  |  |
|--|--|
| <u>  X  </u> Hard hat                            | Cotton clothing to minimize static electricity                         |
| <u>  X  </u> Safety glasses                      | <u>  X  </u> Liquid-proof gloves for sampling or<br>cleaning equipment |
| <u>      </u> Chemical resistant safety<br>boots | <u>      </u> Flashlight (explosion proof)                             |
| <u>  X  </u> Hearing protection                  | <u>      </u> Face shields   |
| <u>      </u> Respirators within 25 feet         | <u>  X  </u> Latex gloves  |

of all on-site personnel when work is in progress.

**K. Decontamination Procedures**

Gloves shall be disposed of after each use. If other equipment becomes contaminated, notify Safety Officer, who will determine whether to clean or dispose.

**L. Standing Orders**

No smoking, no eating, no drinking in the work area.  
No matches, lighters or other open fires allowed in the work area.

**M. Air Monitoring Equipment**

*None required during this phase of work.*

**N. Emergency Equipment**

\_\_\_\_\_ First aid/splint kit                      \_\_\_\_\_ Absorbents with a salvage drum

\_\_\_X\_\_\_ Fire extinguishers (2)                      \_\_\_\_\_ Stretcher

\_\_\_\_\_ At least one person trained in First Aid and CPR should be on-site at all times.

Note: Do not give oxygen to any person who has been overcome by explosive vapors.

**O. Affirmations**

The Safety Officer will review the contents of this plan with all on-site personnel before the start of work on the first day of the project. Each on-site person will be afforded the opportunity to have all his or her questions answered by the Safety Officer. Each on-site person must read this plan, sign below and enter the date before he or she will be allowed inside the work area.

Name	Date
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

**CAP – NATURAL ATTENUATION WITH EPISODE EFR & AIR SPAGE  
DOC'S GROCERY – JACKSONVILLE, ALABAMA**

- 6. \_\_\_\_\_
- 7. \_\_\_\_\_
- 8. \_\_\_\_\_
- 9. \_\_\_\_\_
- 10. \_\_\_\_\_

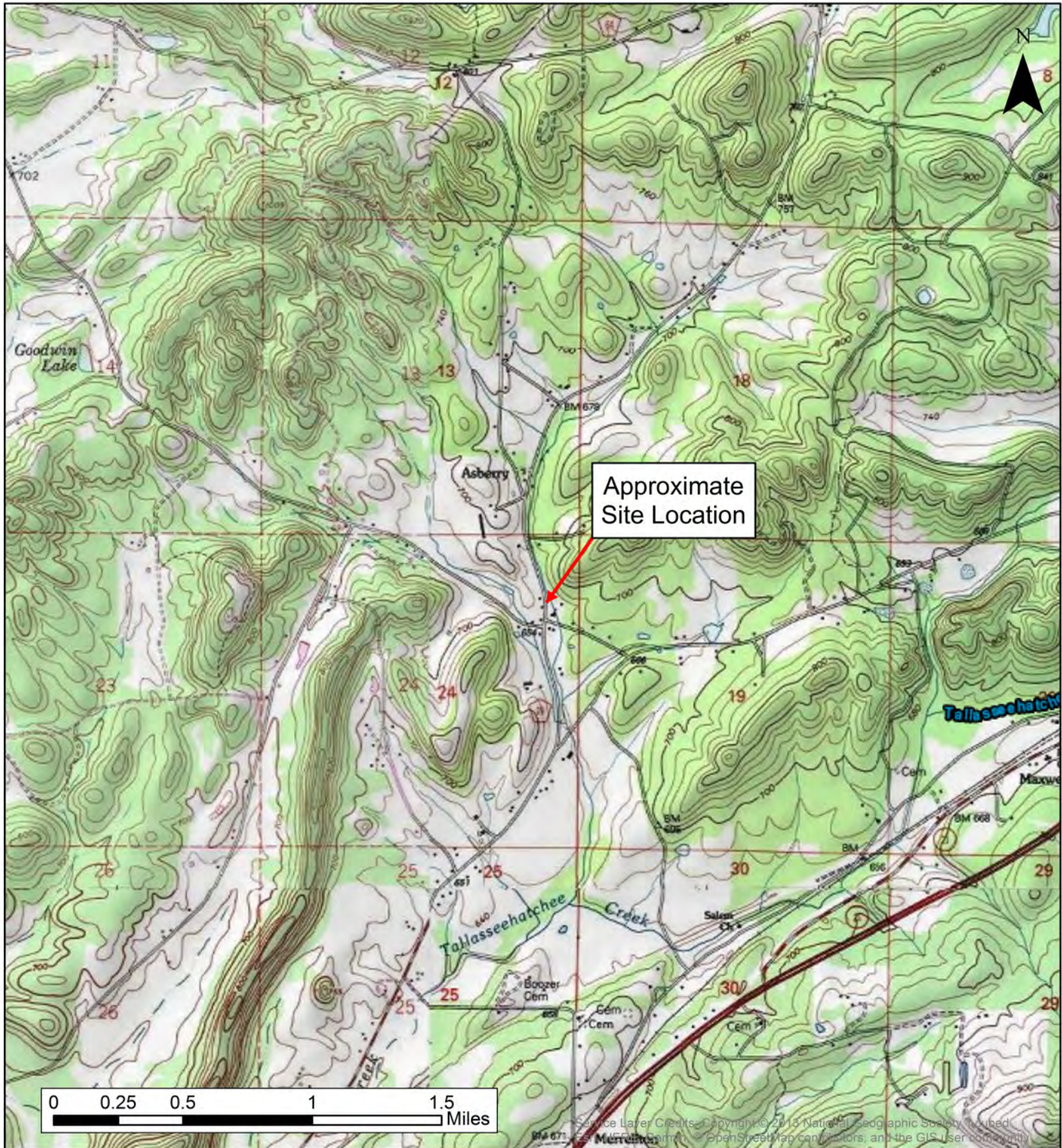
This Safety Plan has been reviewed, approved and explained to all on-site personnel.

\_\_\_\_\_  
Sign

\_\_\_\_\_  
Date

ATTACHMENT 1

FIGURES



## Figure 1 - Site Location Map

Jacksonville, Alabama

Doc's Grocery CP41

Project Number: 1081-012-41

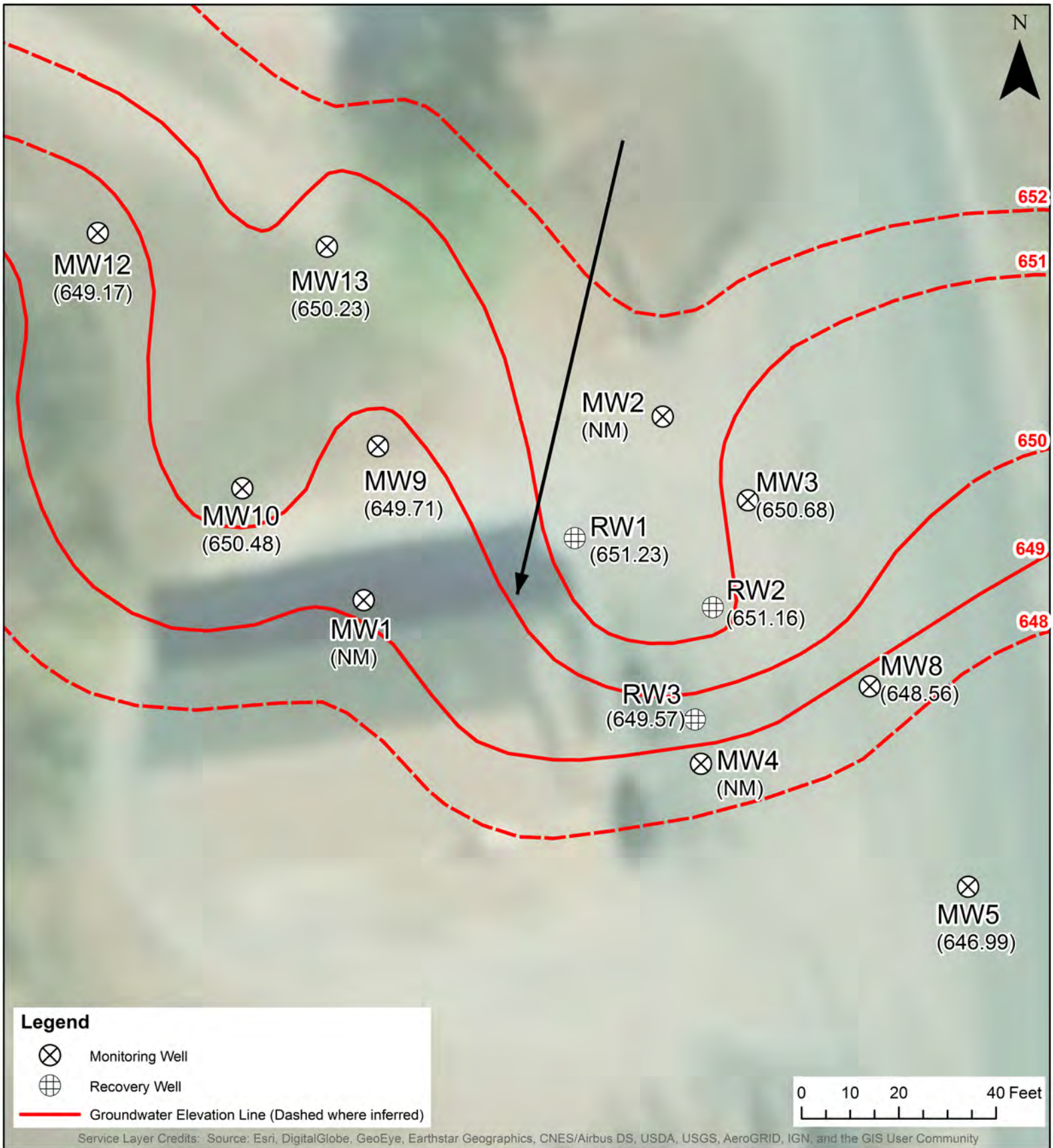
Project Manager: Jamie Cox

Date: 3-21-2019



**SPECTRUM**  
Solutions to Your Environmental Challenges





## Figure 2 - Groundwater Elevation Map

Jacksonville, Alabama

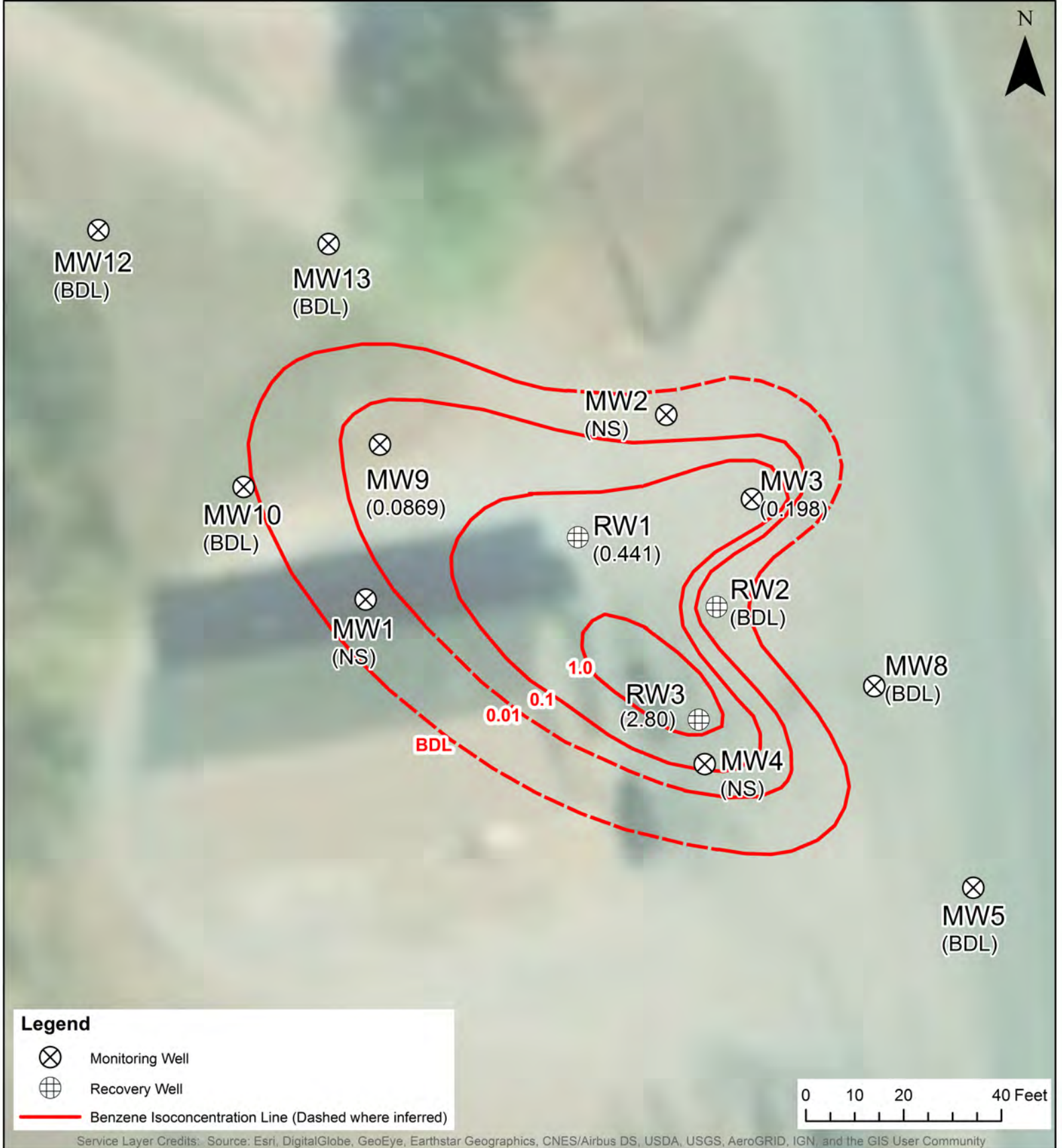
Doc's Grocery CP41

Project Number: 1081-012-41

Project Manager: Jamie Cox

Date: 3-21-19





**Figure 3 - Benzene Isoconcentration Map**

Jacksonville, Alabama

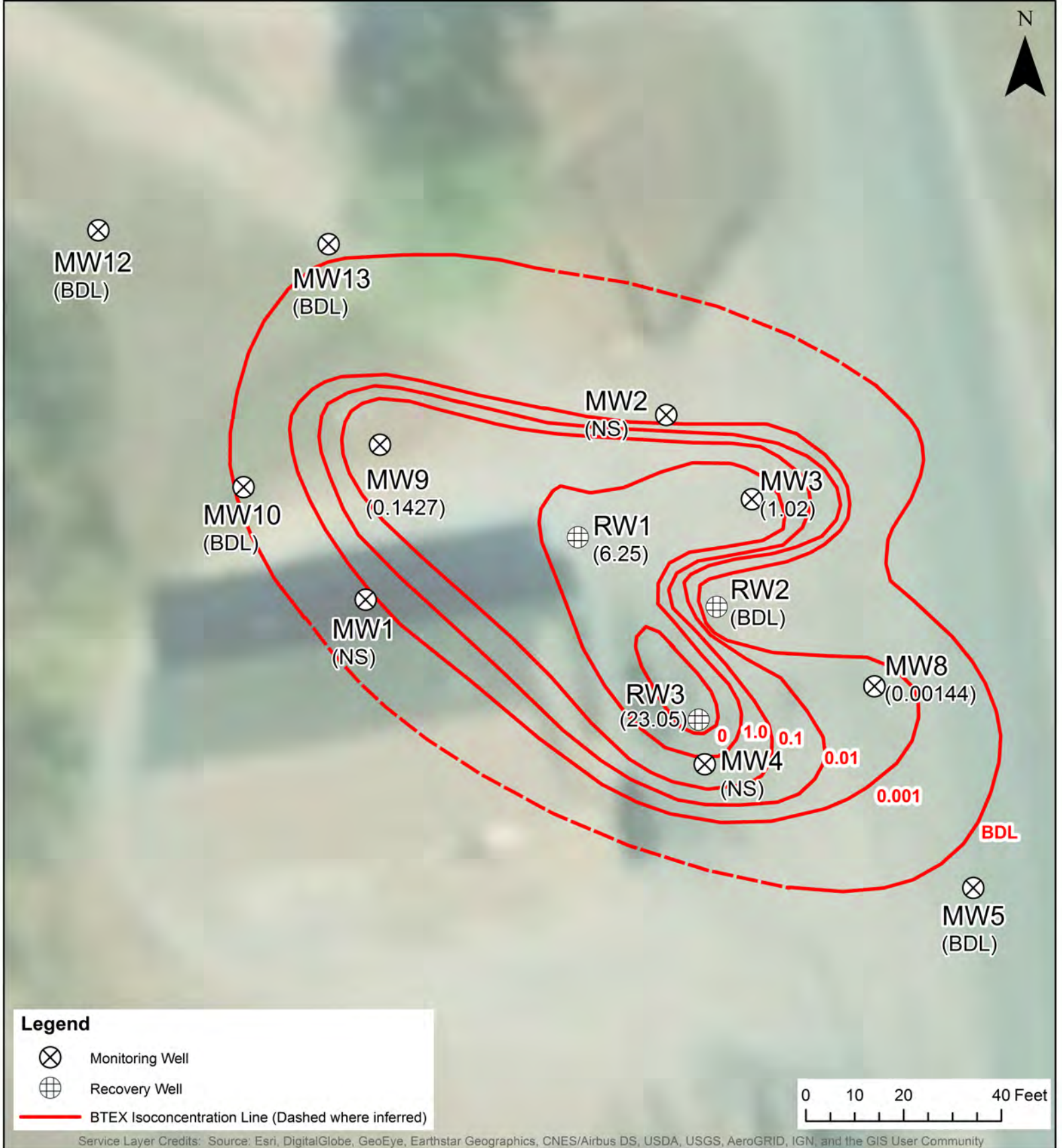
Doc's Grocery CP41

Project Number: 1081-012-41

Project Manager: Jamie Cox

Date: 3-21-19





**Figure 4 - BTEX Isoconcentration Map**

Jacksonville, Alabama

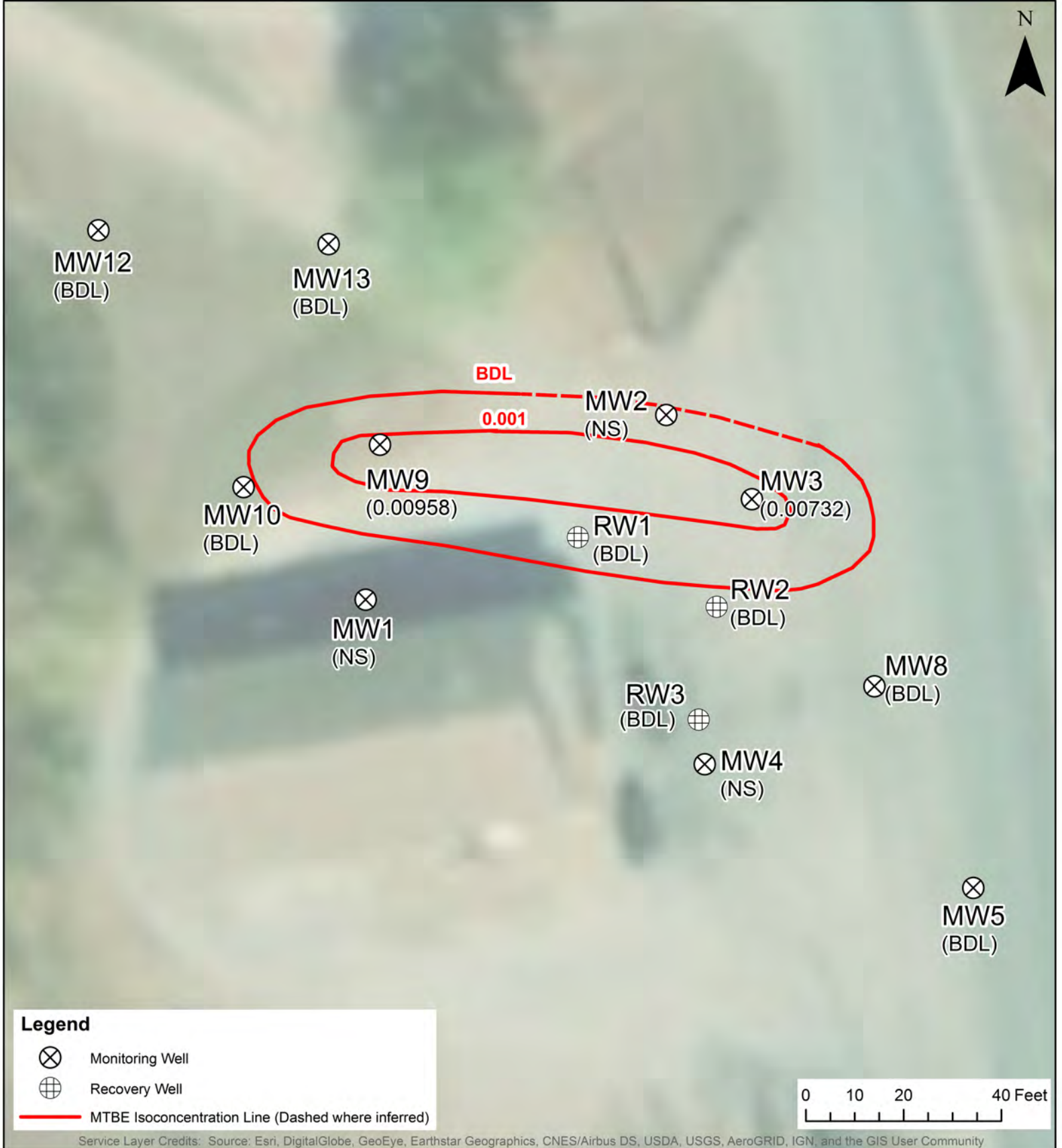
Doc's Grocery CP41

Project Number: 1081-012-41

Project Manager: Jamie Cox

Date: 3-21-19





**Figure 5 - MTBE Isoconcentration Map**

Jacksonville, Alabama

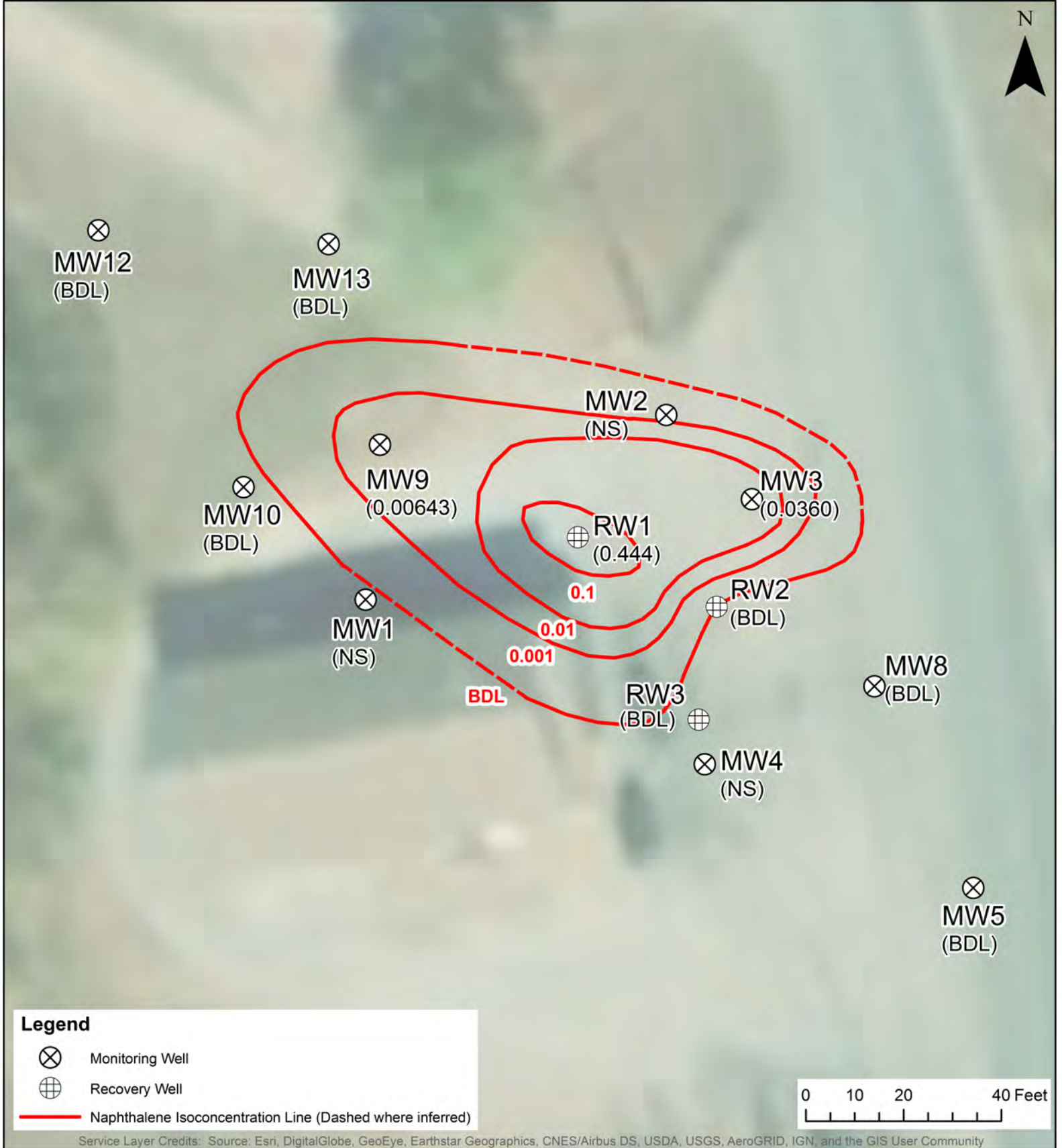
Doc's Grocery CP41

Project Number: 1081-012-41

Project Manager: Jamie Cox

Date: 3-21-19





Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

### Figure 5 - Naphthalene Isoconcentration Map

Jacksonville, Alabama

Doc's Grocery CP41

Project Number: 1081-012-41

Project Manager: Jamie Cox

Date: 3-21-19



ATTACHMENT 2

TABLES

**NATURAL ATTENUATION MONITORING REPORT**

Facility Name: Doc's Grocery  
Facility I. D. No.: 13652-015-012698  
Incident No.: UST98-02-07  
Consulting Firm: Poly/Spectrum

Year: 2018/2019  
Sample Frequency: Triannual  
Reporting period: 3 of 3  
Project Manager: Jamie Cox

**Section 1 - Site Summary**

**Purpose of Monitoring:**

No Plume Characterization  
 Yes Confirmation Monitoring  
 Yes Remediation by Natural Attenuation  
(Approved Corrective Action Plan)

**Site Status:**

YES Assessment Complete  
 YES ARBCA Evaluation Conducted  
 NO Active UST's  
 F.2 Site Classification  
 YES Free Product ever present

**Number of Groundwater Monitoring Wells:**

Piezometers  
 Type II  
 Type III  
 Other

**Number of Water Supply Wells:**

Public (within 1 mile radius of site)  
 Private (within 1000 foot radius of site)  
 Other (Explain) \_\_\_\_\_

**Status of Waste Water Disposal:**

Quantity (gallons)       Disposal Method  
 Stored On-site       Disposal Documents

**Comments:**

As part of the approved corrective action plan, Poly/Spectrum conducted a groundwater monitoring event and a MEME event for the year 2019 at the above referenced site.

This report covers the results of sampling of the approved wells.

**ARBCA EVALUATION INCLUDING THE SSTL'S DEVELOPED FOR THE SITE  
AND THE LOCATION OF THE POINT OF COMPLIANCE.**

**ARBCA Tier II Evaluation Summary**

- 1) Benzene concentrations in monitoring wells MW-3, MW-9, RW-1 and RW-3 exceeded the SSTLs developed for the site.
- 2) Toluene concentration in monitoring well RW-1 and RW-3 exceeded the SSTLs developed for the site.
- 3) Naphthalene concentrations in monitoring well RW-1 exceeded the exceeded the SSTLs developed for this site.
- 4) Ethylbenzene concentrations in monitoring well RW-1 exceeded the exceeded the SSTLs developed for this site.



Media/Area	Applicable Tier II Media-Pathway Comparison	Benzene	Toluene	hylbenze	Xylenes	MtBE
Subsurface Soils	Indoor Inhalation of Vapor From Subsurface Soil	9.13	1837.07	2435.01	2792.52	13841.95
	Outdoor Inhalation of Vapor From Subsurface Soil	449.21	5219.84	2435.01	3071.95	45149.70
	Onsite Tier II Target Level - Subsurface Soil	<b>9.13</b>	<b>1837.07</b>	<b>2435.01</b>	<b>2792.52</b>	<b>13841.95</b>
Groundwater	Onsite Indoor Inhalation of Vapor from Groundwater	30.60	526.00	169.00	175.00	48000.00
	Onsite Outdoor Inhalation of Vapor from Groundwater	1750.00	526.00	169.00	175.00	48000.00
	Onsite Ingestion of Groundwater	NA	NA	NA	NA	NA
	Onsite Tier II Target Level for Groundwater	<b>30.60</b>	<b>526.00</b>	<b>169.00</b>	<b>175.00</b>	<b>48000.00</b>
	Offsite Indoor Inhalation of Vapor from Groundwater	4.67	285.13	169.00	175.00	5661.03
	Offsite Outdoor Inhalation of Vapor from Groundwater	1750.00	526.00	169.00	175.00	48000.00
	Offsite Ingestion of Water	NA	NA	NA	NA	NA
	Offsite Tier II Target Level for Groundwater	<b>4.67</b>	<b>285.13</b>	<b>169.00</b>	<b>175.00</b>	<b>5661.03</b>
Groundwater Resource Protection	Allowable Soil Concentration at Source Protective of POE	0.04673	20.89378	21.23529	369.59166	0.03961
	Allowable Groundwater Concentration at Source Protective of the POE	0.00837	1.67442	1.17209	16.74419	0.03349
	Allowable GW concentration at POC 25 feet from source (MW-2)	0.0083	1.6599	1.1619	16.5990	0.0332
	Allowable GW concentration at POC 42 feet from source (MW-5)	0.0074	1.4762	1.0334	14.7625	0.0295
	Allowable GW concentratioin at POC 26 feet from source (MW-8)	0.008	1.655	1.158	16.550	0.033
	Allowable GW concentration at POC 15 feet from source (MW-9)	0.008	1.674	1.172	16.744	0.033
	Allowable GW Concentration at POC 30 feet from source (MW-10)	0.008	1.626	1.138	16.263	0.033
	Allowable GW Concentration at POC 75 feet from source (MW-12)	0.005	1.000	0.700	10.000	0.020
	Allowable GW Concentration at POC 65 feet from source (MW-13)	0.006	1.134	0.794	11.340	0.023

Contaminant concentrations presented in miligrams per liter (mg/L)

Domain for Source Groundwater: Monitoring Wells MW-1, MW-3, MW-4, RW-1, RW-2, RW-3

**NATURAL ATTENUATION MONITORING REPORT**

Facility Name: Doc's Grocery  
 Facility I. D. No.: 13652-015-012698  
 Incident No.: UST98-02-07  
 Consulting Firm: Poly/Spectrum

Year: 2018/2019  
 Sample Frequency: Triannual  
 Reporting period: 3 of 3  
 Project Manager: Jamie Cox

**Section 2 - Site Maps**

Attach site map(s) illustrating all well locations, location of former and/or current UST system(s), utilities, adjacent properties, receptors, current and most likely future land use of site and adjacent properties, Point of Compliance, buildings and other pertinent features. All maps should contain a north arrow and should be to scale.

**Section 3 - Well Inventory Tables**

Monitoring Wells				
Well ID	Date Installed	Diameter (inches)	Screened Interval (Feet bgs)	*Depth to Water (feet bgs)
MW-1	8/24/1999	2.000	634.87-644.87	NM
MW-2	8/24/1999	2.000	635.23-645.23	NM
MW-3	8/24/1999	2.000	634.80-644.80	4.12
MW-4	8/24/1999	2.000	635.73-645.73	NM
MW-5	1/11/2000	2.000	629.57-644.57	7.58
MW-8	1/12/2000	2.000	629.76-644.76	6.20
MW-9	1/12/2000	2.000	629.24-644.24	4.53
MW-10	1/12/2000	2.000	629.15-644.15	3.67
MW-12	1/13/2000	2.000	629.13-644.13	4.96
MW-13	1/13/2000	2.000	628.58-643.58	3.35
RW-1	10/22/2008	4.000	636.16-646.16	3.93
RW-2	10/22/2008	4.000	631.38-646.38	3.72
RW-3	10/22/2008	4.000	634.90-644.90	5.33

3/21/2019

Water Supply Wells					
Well ID	Date Installed	Diameter (inches)	Screened Interval (Feet bgs)	Depth to Water (feet bgs)	Well Use
P-1	Unknown	UK.	UK	UK	None

**NATURAL ATTENUATION MONITORING REPORT**

Facility Name: Doc's Grocery  
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 Incident No.: UST98-02-07  
 Consulting Firm: Poly/Spectrum

Year: 2018/2019  
 Sample Frequency: Triannual  
 Reporting period: 3 of 3  
 Project Manager: Jamie Cox

Section 4 - History of Sampling														
Date Sampled	Sampling Parameters										Sampled By			
	BTEX	MTBE	PAH	methane	D.O.	Nitrate	Fe <sup>+2</sup>	Sulfate				Name	Company	Title
8/25/1999	X	X			X							Grinder	Spectrum	TECH
1/13/2000	X	X			X							Grinder	Spectrum	TECH
1/9/2001	X	X			X							Grinder	Spectrum	TECH
5/8/2001	X	X			X							Self	Spectrum	TECH
9/25/2001	X	X			X							Moore	Spectrum	TECH
9/18/2003	X	X			X							Horner	Spectrum	TECH
4/20/2004	X	X			X							White	Spectrum	TECH
6/22/2004	X	X			X							White	Spectrum	TECH
8/2/2005	X	X			X							White	Spectrum	TECH
1/23/2007	X	X			X	X	X	X				Wade	Spectrum	TECH
4/24/2007	X	X			X	X	X	X				Wade	Spectrum	TECH
10/31/2007	X	X			X	X	X	X				Moore	Spectrum	TECH
2/25/2008	X	X			X	X	X	X				Moore	Spectrum	TECH
6/25/2008	X	X			X	X	X	X				Moore	Spectrum	TECH
11/10/2008	X	X			X							Moore	Spectrum	TECH
12/3/2009	X	X			X							Moore	Spectrum	TECH
5/20/2010	X	X			X							Moore	Spectrum	TECH
10/6/2010	X	X			X							Moore	Spectrum	TECH
12/7/2011	X	X										Moore	Spectrum	TECH
1/11/2012	X	X										Moore	Spectrum	TECH
9/14/2012	X	X										Moore	Spectrum	TECH
6/12/2013	X	X										Cox	Spectrum	Geologist
8/28/2013	X	X										McCormick	Spectrum	TECH
12/3/2013	X	X										McCormick	Spectrum	TECH
7/24/2014	X	X			X							McCormick	Spectrum	TECH
11/5/2014	X	X			X							McCormick	Spectrum	TECH
2/17/2015	X	X			X							McCormick	Spectrum	TECH
9/17/2015	X	X			X							McCormick	Spectrum	TECH
2/11/2016	X	X			X							McCormick	Spectrum	TECH
6/21/2016	X	X			X							McCormick	Spectrum	TECH
2/1/2017	X	X			X							Abbott	Spectrum	TECH
6/21/2017	X	X										Abbott	Spectrum	TECH
11/14/2017	X	X										Abbott	Spectrum	TECH
7/26/2018	X	X										Abbott	Spectrum	TECH
11/27/2019	X	X										Abbott	Spectrum	TECH
3/21/2019	X	X										Abbott	Spectrum	TECH

**NATURAL ATTENUATION MONITORING REPORT**

IFacility Name: Doc's Grocery  
 IFacility I. D. No.: 13652-015-012698  
 I Incident No.: UST98-02-07  
 C Consulting Firm: Poly/Spectrum

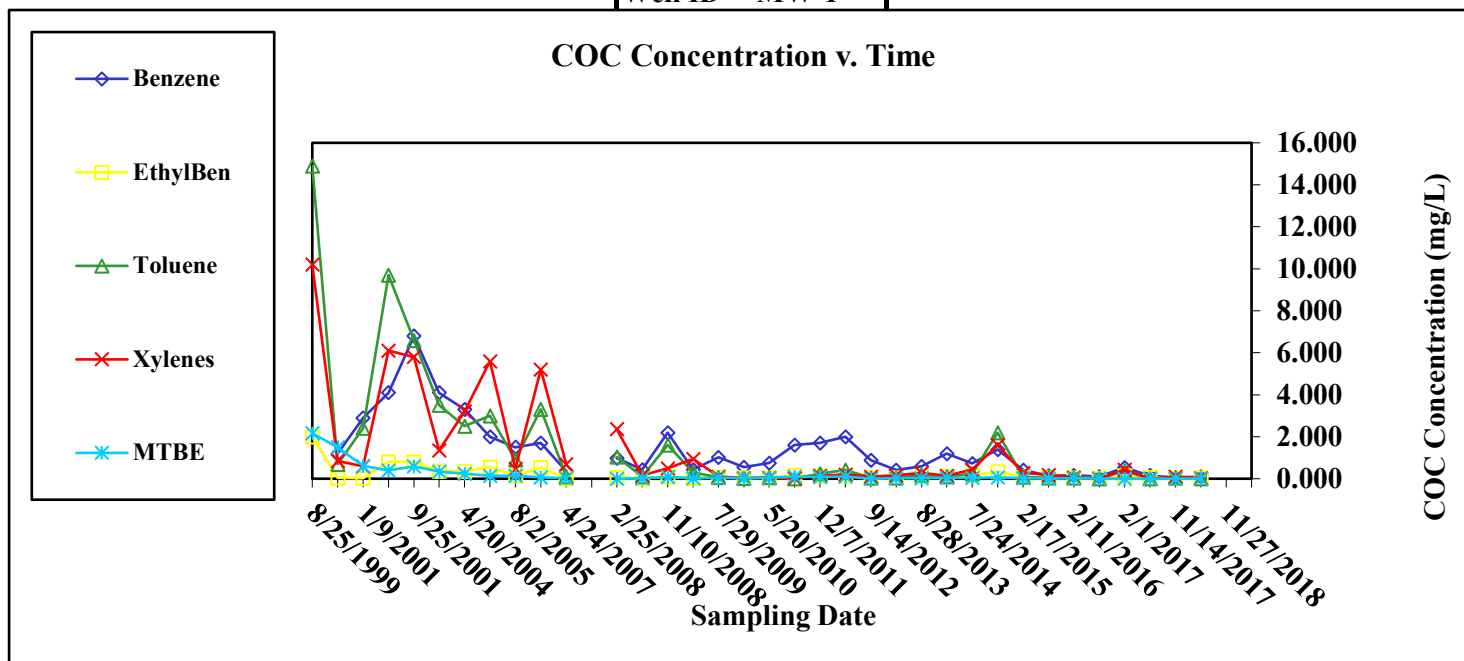
Year: 2018/2019  
 Sample Frequency: Triannual  
 Reporting period: 3 of 3  
 Project Manager: Jamie Cox

Section 5 - Sampling Methodology														
Date Sampled	Analytical Methods										Sampled By			
	BTEX	MTBE	PAH	methane	D.O.	Nitrate	Fe <sup>+2</sup>	Sulfate				Name	Company	Title
8/25/1999	602	602			Field							Grinder	Spectrum	TECH
1/13/2000	602	602			Field							Grinder	Spectrum	TECH
1/9/2001	602	602			Field							Grinder	Spectrum	TECH
5/8/2001	602	602			Field							Self	Spectrum	TECH
9/25/2001	602	602			Field							Moore	Spectrum	TECH
9/18/2003	602	602			Field							Horner	Spectrum	TECH
4/20/2004	602	602			Field							White	Spectrum	TECH
6/22/2004	602	602			Field							White	Spectrum	TECH
8/2/2005	602	602			Field							White	Spectrum	TECH
1/23/2007	8021	8021			Field	9210	3500	375.4				Wade	Spectrum	TECH
4/24/2007	8021	8021			Field	9210	3500	375.4				Wade	Spectrum	TECH
10/31/2007	8021	8021			Field	9210	3500	375.4				Moore	Spectrum	TECH
2/25/2008	8021	8021			Field	9210	3500	375.4				Moore	Spectrum	TECH
6/25/2008	8021	8021			Field	9210	3500	375.4				Moore	Spectrum	TECH
11/10/2008	8021	8021			Field							Moore	Spectrum	TECH
12/3/2009	8021	8021			Field							Moore	Spectrum	TECH
5/20/2010	8021	8021			Field							Moore	Spectrum	TECH
10/6/2010	8021	8021			Field							Moore	Spectrum	TECH
12/7/2011	8021	8021										Moore	Spectrum	TECH
1/11/2012	8021	8021										Moore	Spectrum	TECH
9/14/2012	8021	8021										Moore	Spectrum	TECH
6/12/2013	8021	8021										Cox	Spectrum	Geologist
8/28/2013	8021	8021										McCormick	Spectrum	TECH
12/3/2013	8021	8021										McCormick	Spectrum	TECH
7/24/2014	8021	8021			Field							McCormick	Spectrum	TECH
11/5/2014	8021	8021			Field							McCormick	Spectrum	TECH
2/17/2015	8021	8021			Field							McCormick	Spectrum	TECH
9/17/2015	8021	8021			Field							McCormick	Spectrum	TECH
2/11/2016	8021	8021			Field							McCormick	Spectrum	TECH
6/21/2016	8021	8021			Field							McCormick	Spectrum	TECH
2/1/2017	8021	8021			Field							Abbott	Spectrum	TECH
6/21/2017	8021	8021			Field							Abbott	Spectrum	TECH
11/14/2017	8021	8021			Field							Abbott	Spectrum	TECH
7/26/2018	8021	8021			Field							Abbott	Spectrum	TECH
11/27/2018	8021	8021			Field							Abbott	Spectrum	TECH
3/21/2019	8021	8021			Field							Abbott	Spectrum	TECH

**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

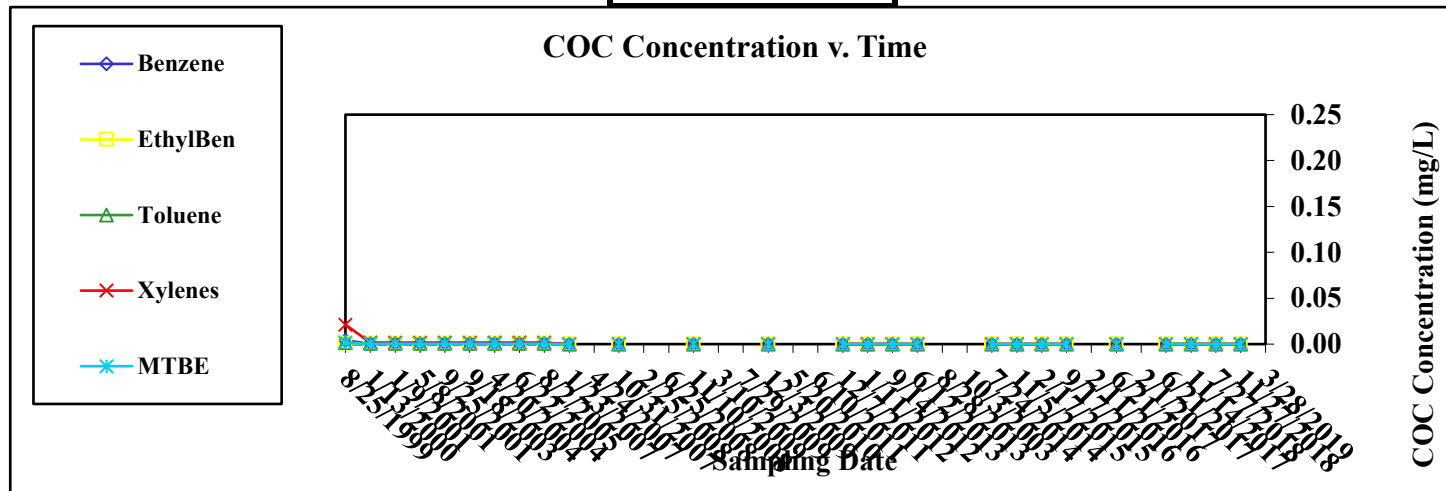
Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)									
Well ID MW-1									
Historical Chemicals of Concern Data									
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalene			
8/25/1999		2.000	14.900	10.200	2.170				not sampled
1/13/2000	1.200	0.038	0.680	0.850	1.500				missing
1/9/2001	2.900	0.020	2.400	0.600	0.620				not existing
5/8/2001	4.100	0.800	9.700	6.100	0.400				Dry
9/25/2001	6.800	0.800	6.600	5.800	0.600				exceeded SSTLs
9/18/2003	4.100	0.350	3.500	1.360	0.340				
4/20/2004	3.300	0.360	2.500	3.200	0.240				
6/22/2004	2.000	0.550	3.000	5.600	0.140				
8/2/2005	1.500	0.150	0.900	0.480	0.140				
1/23/2007	1.700	0.530	3.300	5.200	0.060				
4/24/2007	0.360	0.010	0.100	0.680	0.020				
10/31/2007									
2/25/2008	0.990	0.070	1.040	2.360	<0.01				
6/25/2008	0.440	0.010	0.100	0.170	0.030				
11/10/2008	2.200	0.100	1.600	0.500	0.090				
3/10/2009	0.440	0.02	0.29	0.94	0.02				
7/29/2009	1.020	0.080	0.060	0.100	0.040				
12/3/2009	0.550	0.040	0.030	0.030	0.020				
5/20/2010	0.750	0.050	0.060	0.050	0.040				
10/6/2010	1.600	0.160	0.010	0.020	0.110				
12/7/2011	1.700	0.120	0.240	0.150	0.080				
1/11/2012	2.000	0.140	0.420	0.199	0.100				
9/14/2012	0.880	0.040	0.040	0.110	<.01				
6/12/2013	0.420	0.040	0.050	0.160	0.020				
8/28/2013	0.600	0.110	0.180	0.270	0.030				
12/3/2013	1.200	0.110	0.100	0.150	0.050				
7/24/2014	0.720	0.160	0.240	0.440	0.037				
11/5/2014	1.400	0.330	2.200	1.600	0.056	0.200			
2/17/2015	0.410	0.079	0.079	0.270	0.018	0.062			
9/17/2015	0.133	0.052	0.040	0.177	0.008	0.045			
2/11/2016	0.153	0.037	0.048	0.064	0.020	0.063			
6/21/2016	0.111	0.016	<0.005	0.011	0.012	0.022			
2/1/2017	0.531	0.140	0.368	0.426	<0.0250	<0.125			
6/21/2017	0.151	0.055	0.003	0.003	0.003	0.012			
11/14/2017	0.058	0.015	0.039	0.099	0.004	0.013			
7/28/2018	0.111	0.051	0.008	0.024	0.013	0.026			
11/27/2018									
3/21/2019									



**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)							
		Well ID		MW-2			
Historical Chemicals of Concern Data							
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalene	
8/25/1999	0.004	0.0005	0.0015	0.0212	0.0016		not sampled
1/13/2000	0.0005	0.0005	0.0005	0.0015	0.0005		missing
1/9/2001	0.0005	0.0005	0.0005	0.0015	0.0005		not existing
5/8/2001	0.0005	0.0005	0.0005	0.0015	0.0005		Dry
9/25/2001	0.0005	0.0005	0.0005	0.0015	0.0005		exceeded SSTLs
9/18/2003	0.0005	0.0005	0.0005	0.0015	0.0005		
4/20/2004	0.0005	0.0005	0.0005	0.0015	0.0005		
6/22/2004	0.0005	0.0005	0.0005	0.0015	0.0005		
8/2/2005	0.0005	0.0005	0.0005	0.0015	0.0005		
1/23/2007	<0.001	<0.001	<0.001	<0.003	<0.001		
4/24/2007							
10/31/2007	<0.001	<0.001	<0.001	<0.003	<0.001		
2/25/2008							
6/25/2008							
11/10/2008	<0.001	<0.001	<0.001	<0.003	<0.001		
3/10/2009							
7/29/2009							
12/3/2009	<0.001	<0.001	<0.001	<0.003	<0.001		
5/20/2010							
6/10/2011							
12/7/2011	<0.001	<0.001	<0.001	<0.003	<0.001		
1/11/2012	<0.001	<0.001	<0.001	<0.003	<0.001		
9/14/2012	<0.001	<0.001	<0.001	<0.003	<0.001		
6/12/2013							
8/28/2013							
10/3/2013							
7/24/2014	<0.001	<0.001	<0.001	<0.003	<0.001		
11/5/2014	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005	
2/17/2015	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005	
9/17/2015	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005	
2/11/2016							
6/21/2016	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005	
2/1/2017							
6/21/2017	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005	
11/14/2017	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005	
7/27/2018	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005	
11/27/2018	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005	
3/28/2019							

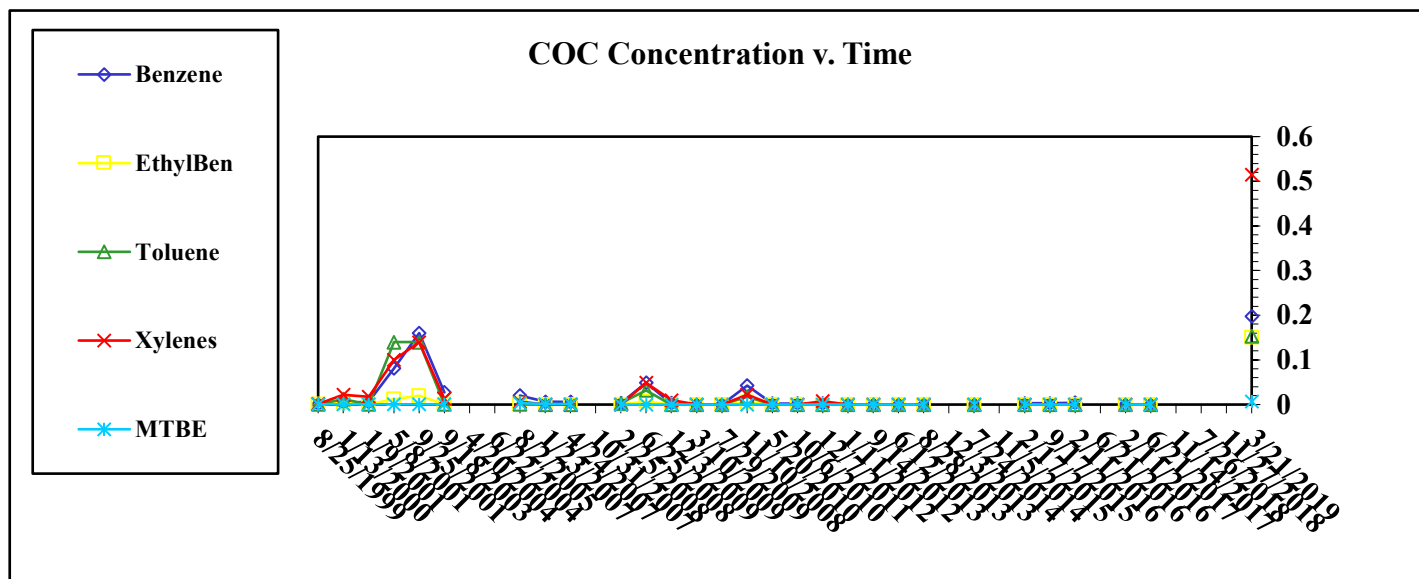


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)							
Well ID MW-3							
Historical Chemicals of Concern Data							
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalen	
8/25/1999	0.0005	0.0005	0.0005	0.0015	0.0005		not sampled
1/13/2000	0.0032	0.0036	0.012	0.022	0.0005		missing
1/9/2001	0.00637	0.0005	0.0005	0.0176	0.0005		not existing
5/8/2001	0.081	0.012	0.14	0.1	0.0005		Dry
9/25/2001	0.16	0.02	0.14	0.14	0.0005		exceeded SSTLs
9/18/2003	0.0274	0.0005	0.0005	0.0132	0.0005		
4/20/2004							
6/22/2004							
8/2/2005	0.0201	0.0005	0.0005	0.00635	0.0033		
1/23/2007	0.00656	<0.001	<0.001	<0.003	0.00107		
4/24/2007	0.00574	<0.001	<0.001	<0.003	0.00109		
10/31/2007							
2/25/2008	0.003	<0.001	0.003	<0.003	<0.001		
6/25/2008	0.049	0.007	0.032	0.049	<0.001		
12/3/2009	0.003	<0.001	<0.001	0.010	<0.001		
3/10/2009	<0.001	<0.001	<0.001	<0.003	<0.001		
7/29/2009	<0.001	<0.001	<0.001	<0.003	<0.001		
11/10/2008	0.043	0.005	0.017	0.022	<0.001		
5/20/2010	0.003	<0.001	<0.001	<0.003	<0.001		
10/6/2010	0.002	<0.001	<0.001	<0.003	<0.001		
12/7/2011	0.002	<0.001	<0.001	0.0076	<0.001		
1/11/2012	<0.001	<0.001	<0.001	<0.003	<0.001		
9/14/2012	<0.001	<0.001	<0.001	<0.003	<0.001		
6/12/2013							
8/28/2013	<0.001	<0.001	<0.001	<0.003	<0.001		
12/3/2013							
7/24/2014	<0.001	<0.001	<0.001	<0.003	<0.001		
11/5/2014							
2/17/2015	0.0026	<0.001	<0.005	<0.003	<0.005	<0.005	
9/17/2015	0.0028	<0.001	<0.005	<0.003	<0.001	<0.005	
2/11/2016	0.00394	<0.001	<0.001	<0.003	<0.001	<0.005	
6/21/2016							
2/11/2016	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005	
6/21/2017	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005	
11/14/2017							
7/26/2018							
11/27/2018							
3/21/2019	0.198	0.1500	0.1530	0.5150	0.007	0.036	

Well ID MW-3

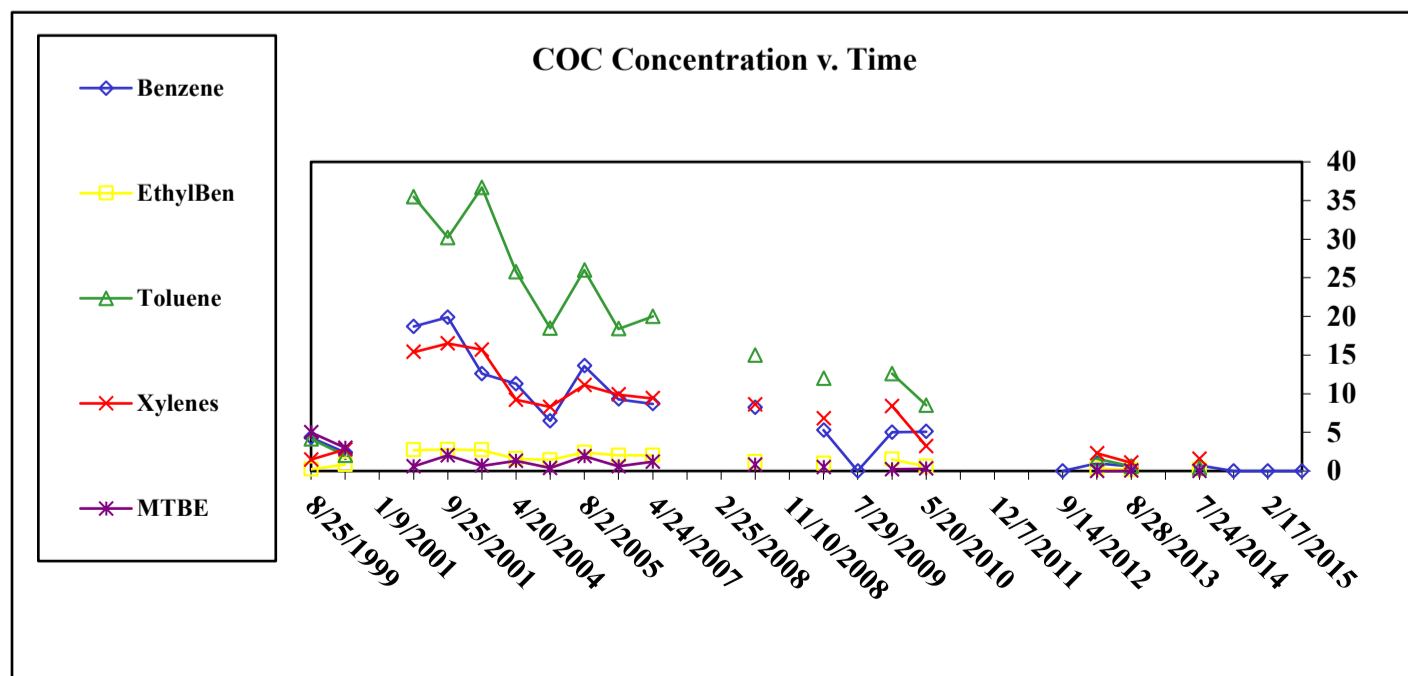


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)							
Well ID MW-4							
Historical Chemicals of Concern Data							
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalene	
8/25/1999	4.34	0.21	4.13	1.46	4.99		not sampled
1/13/2000	2.4	0.84	2	2.8	3		missing
1/9/2001							not existing
5/8/2001	18.7	2.7	35.5	15.4	0.6		Dry
9/25/2001	19.9	2.8	30.2	16.5	2		exceeded SSTLs
9/18/2003	12.6	2.7	36.7	15.7	0.69		
4/20/2004	11.3	1.6	25.8	9.2	1.3		
6/22/2004	6.5	1.4	18.5	8.3	0.4		
8/2/2005	13.6	2.4	26	11.1	1.9		
1/23/2007	9.3	2	18.4	9.9	0.6		
4/24/2007	8.7	2	20	9.4	1.2		
10/31/2007							
2/25/2008							
6/25/2008	8.20	1.20	15.00	8.60	0.80		
11/10/2008							
3/10/2009	5.3000	1.0000	12.0000	6.8000	0.5000		
7/29/2009	Sample Broken in shipment						
12/3/2009	5.00	1.50	12.60	8.40	0.20		
5/20/2010	5.10	0.60	8.50	3.20	0.30		
10/6/2010							
12/7/2011							
1/11/2012							
9/14/2012							
6/12/2013	1.00	0.3	1.6	2.3	<0.1		
8/28/2013	0.62	0.17	0.62	1.07	0.03		
12/3/2013							
7/24/2014	0.70	0.24	0.36	1.60	0.02		
11/5/2014	DRY						
2/17/2015	DRY						
9/17/2015	FP Sheen						
2/11/2016	1.50	0.82	0.77	2.47	0.01	0.54	
6/21/2016	0.72	0.53	0.24	1.63	0.01	0.39	
2/1/2017							
6/21/2017							
11/14/2017	0.98	0.82	0.12	1.54	0.01	0.63	
7/26/2018	1.34	1.45	0.11	2.76	<0.05	0.92	
11/27/2018							
3/21/2019							

Well ID MW-4

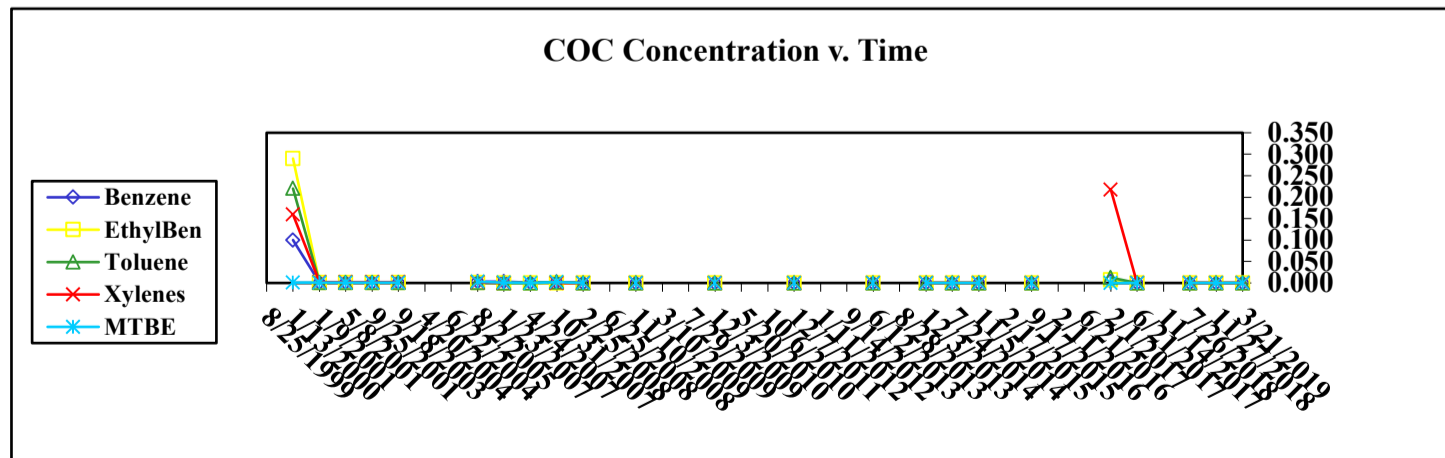




**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)										
Well ID MW-5										
Historical Chemicals of Concern Data										
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalene				
8/25/1999							not sampled			
1/13/2000	0.100	0.290	0.220	0.160	0.001		missing			
1/9/2001	0.001	0.001	0.001	0.002	0.001		not existing			
5/8/2001	0.001	0.001	0.001	0.002	0.001		Dry			
9/25/2001	0.001	0.001	0.001	0.002	0.001		exceeded SSTLs			
9/18/2003	0.001	0.001	0.001	0.002	0.001					
4/20/2004										
6/22/2004										
8/2/2005	0.003	0.001	0.001	0.002	0.003					
1/23/2007	0.003	<0.001	<0.001	<0.003	0.001					
4/24/2007	0.001	<0.001	<0.001		<0.001					
10/31/2007	0.002	<0.001	0.002	<0.003	0.002					
2/25/2008	<0.001	<0.001	<0.001	<0.003	<0.001					
6/25/2008										
11/10/2008	<0.001	<0.001	<0.001	<0.003	<0.001					
3/10/2009										
7/29/2009										
12/3/2009	<0.001	<0.001	<0.001	<0.003	<0.001					
5/20/2010										
10/6/2010										
12/7/2011	<0.001	<0.001	<0.001	<0.003	<0.001					
1/11/2012										
9/14/2012										
6/12/2013	<0.001	<0.001	<0.001	<0.003	<0.001					
8/28/2013										
12/3/2013	<0.001	<0.001	<0.001	<0.003	<0.001					
7/24/2014	<0.001	<0.001	<0.001	<0.003	<0.001					
11/5/2014	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005				
2/17/2015										
9/17/2015	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005				
2/11/2016										
6/21/2016										
2/1/2017	0.004	0.007	0.012	0.217	<0.001	<0.005				
6/21/2017	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005				
11/14/2017										
7/26/2018	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005				
11/27/2018	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005				
3/21/2019	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005				

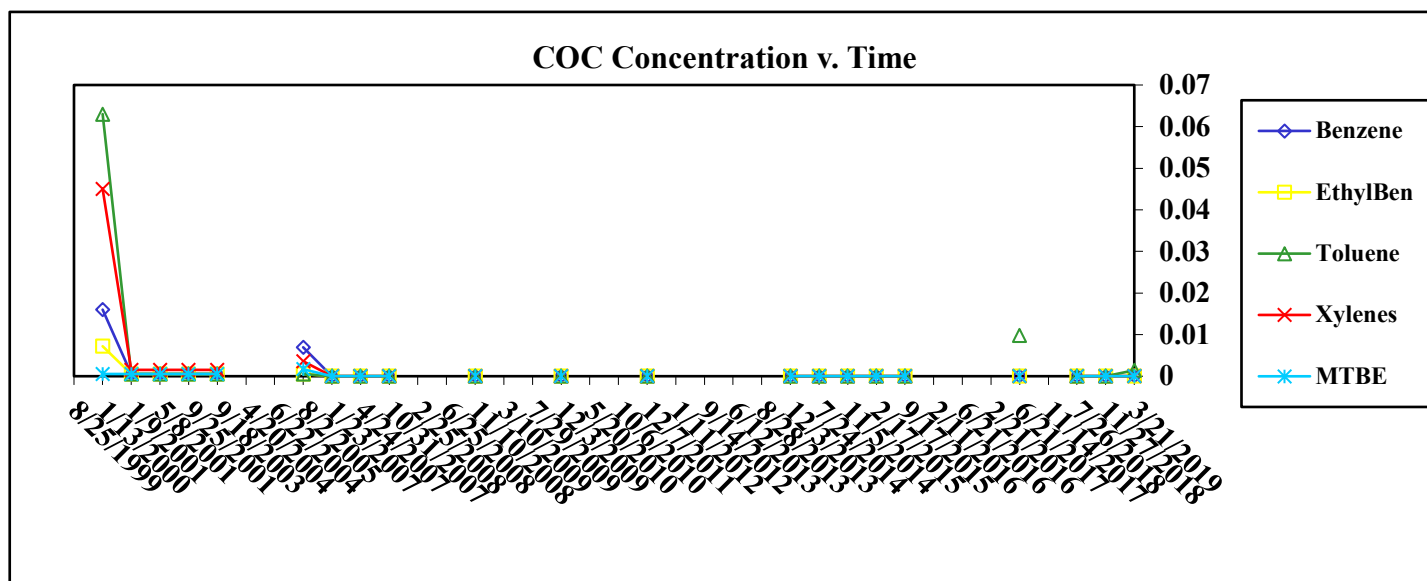


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)									
Well ID MW-8									
Historical Chemicals of Concern Data									
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalen	not sampled		
8/25/1999							missing		
1/13/2000	0.016	0.0072	0.063	0.045	0.0005		not existing		
1/9/2001	0.0005	0.0005	0.0005	0.0015	0.0005		Dry		
5/8/2001	0.0005	0.0005	0.0005	0.0015	0.0005		exceeded SSTLs		
9/25/2001	0.0005	0.0005	0.0005	0.0015	0.0005				
9/18/2003	0.0005	0.0005	0.0005	0.0015	0.0005				
4/20/2004									
6/22/2004									
8/2/2005	0.00697	0.0005	0.0005	0.00362	0.00168				
1/23/2007	<0.001	<0.001	<0.001	<0.003	<0.001				
4/24/2007	<0.001	<0.001	<0.001	<0.003	<0.001				
10/31/2007	<0.001	<0.001	<0.001	<0.003	<0.001				
2/25/2008									
6/25/2008									
11/10/2008	<0.001	<0.001	<0.001	<0.003	<0.001				
3/10/2009									
7/29/2009									
12/3/2009	<0.001	<0.001	<0.001	<0.003	<0.001				
5/20/2010									
10/6/2010									
12/7/2011	<0.001	<0.001	<0.001	<0.003	<0.001				
1/11/2012									
9/14/2012									
6/12/2013									
8/28/2013									
12/3/2013	<0.001	<0.001	<0.001	<0.003	<0.001				
7/24/2014	<0.001	<0.001	<0.001	<0.003	<0.001				
11/5/2014	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005			
2/17/2015	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005			
9/17/2015	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005			
2/11/2016									
6/21/2016									
2/21/2016									
6/21/2017	<0.001	<0.001	0.00984	<0.003	<0.001	<0.005			
11/14/2017									
7/26/2018	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005			
11/27/2018	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005			
3/21/2019	<0.001	<0.001	0.00144	<0.003	<0.001	<0.005			

Well ID MW-8

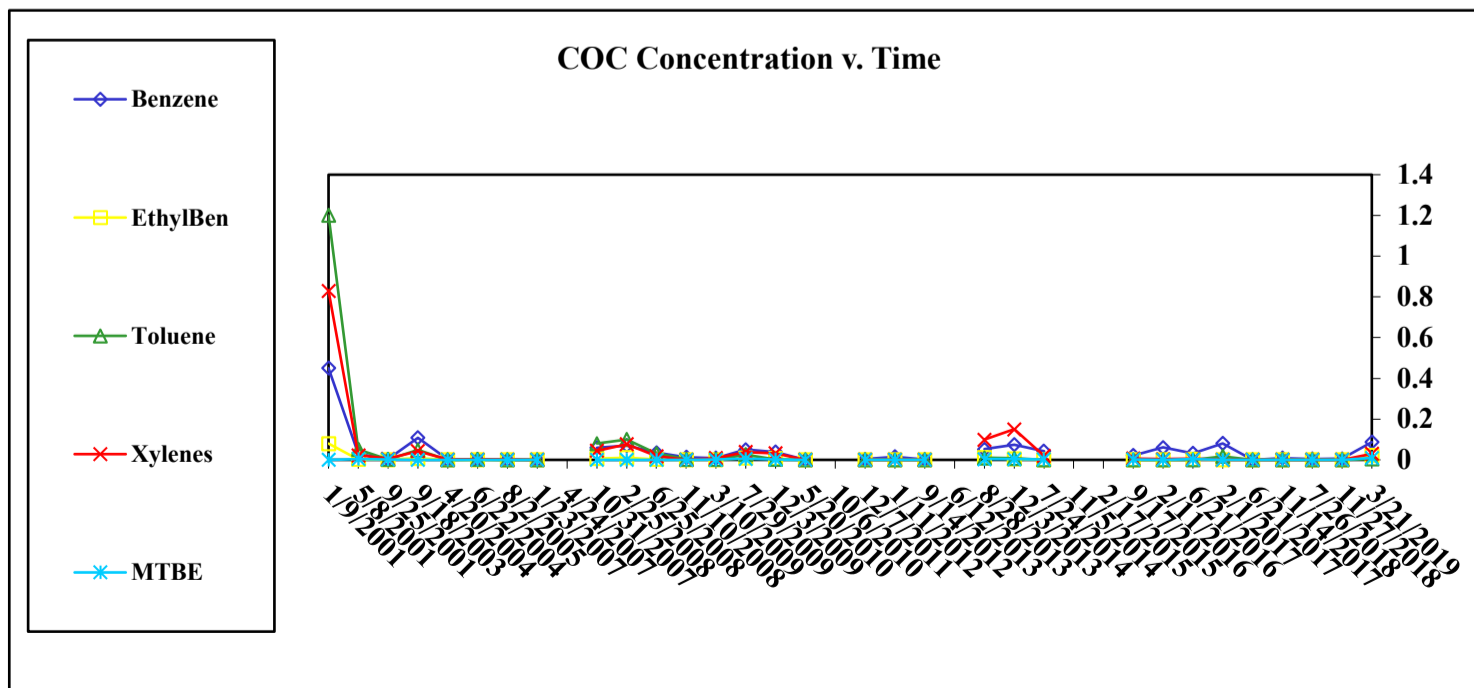


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)							
Well ID MW-9							
Historical Chemicals of Concern Data							
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalene	
8/25/1999							not sampled
1/13/2000	0.026	0.01	0.064	0.054	0.0005		missing
1/9/2001	0.45	0.08	1.2	0.83	0.0005		not existing
5/8/2001	0.0293	0.00245	0.051	0.0227	0.004		Dry
9/25/2001	0.00326	0.00107	0.0022	0.0055	0.00164		exceeded SSTLs
9/18/2003	0.109	0.0079	0.0477	0.0431	0.0005		
4/20/2004	0.00136	0.0005	0.0005	0.0015	0.0005		
6/22/2004	0.00283	0.0005	0.00276	0.0015	0.0005		
8/2/2005	0.0005	0.0005	0.0005	0.0015	0.0005		
1/23/2007	<0.001	<0.001	<0.001	<0.003	<0.001		
4/24/2007							
10/31/2007	0.060	0.007	0.080	0.045	<0.001		
2/25/2008	0.070	0.011	0.100	0.077	<0.001		
6/25/2008	0.035	0.003	0.031	0.018	<0.001		
11/10/2008	0.012	<0.001	0.003	<0.003	<0.001		
3/10/2009	0.008	0.001	0.002	0.009	0.001		
7/29/2009	0.050	0.009	0.025	0.039	0.006		
12/3/2009	0.039	0.007	0.002	0.033	0.003		
5/20/2010	<0.001	<0.001	<0.001	<0.003	<0.001		
10/6/2010							
12/7/2011	0.00355	<0.001	<0.001	<0.003	<0.001		
1/11/2012	0.015	<0.001	<0.001	<0.003	<0.001		
9/14/2012	0.0025	<0.001	<0.001	<0.003	<0.001		
6/12/2013							
8/28/2013	0.0524	0.0113	0.01	0.0988	0.00333		
12/3/2013	0.0741	0.00425	0.00777	0.150	0.004		
7/24/2014	0.042	<0.001	<0.001	0.020	0.003		
11/5/2014							
2/17/2015							
9/17/2015	0.0213	<0.001	<0.005	0.006	0.002	<0.005	
2/11/2016	0.0607	<0.001	<0.005	0.004	<0.001	<0.005	
6/21/2016	0.0326	0.00301	<0.005	0.006	0.003	<0.005	
2/1/2017	0.0814	<0.01	0.0178	<0.03	<0.01	<0.05	
6/21/2017	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005	
11/14/2017	0.00886	<0.001	<0.001	<0.003	<0.001	<0.005	
7/26/2018	0.00421	<0.001	<0.001	<0.003	<0.001	<0.005	
11/27/2018	0.00525	<0.001	<0.001	<0.003	<0.001	<0.005	
3/21/2019	0.0869	0.0216	0.00397	0.0302	0.00958	0.006	

Well ID MW-9



**NATURAL ATTENUATION MONITORING REPORT**

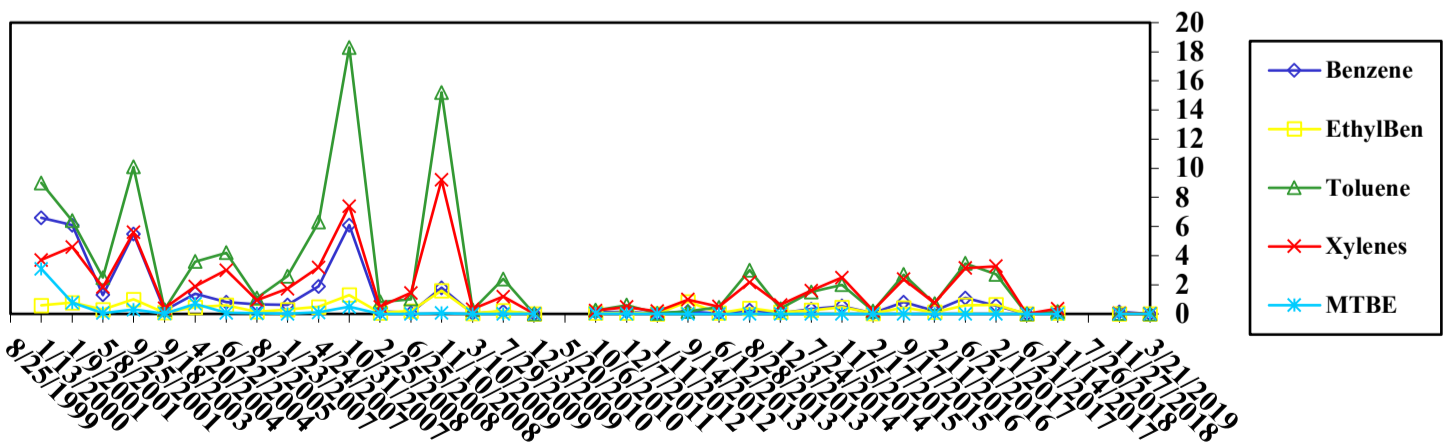
Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

**Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)**

Well ID MW-10							
Historical Chemicals of Concern Data							
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalene	
8/25/1999							exceeded SSTLs
1/13/2000	6.6	0.59	9	3.7	3.1		not sampled
1/9/2001	6.1	0.77	6.4	4.6	0.77		missing
5/8/2001	1.3	0.3	2.5	1.84	0.06		not existing
9/25/2001	5.5	1	10.1	5.6	0.3		Dry
9/18/2003	0.23	0.09	0.3	0.4	0.0266		
4/20/2004	1.4	0.453	3.6	1.9	0.7		
6/22/2004	0.8	0.6	4.2	3	0.07		
8/2/2005	0.65	0.15	1.1	0.94	0.05		
1/23/2007	0.62	0.29	2.6	1.74	0.02		
4/24/2007	1.9	0.5	6.3	3.2	0.1		
10/31/2007	6.100	1.300	18.300	7.400	0.490		
2/25/2008	0.17	0.07	0.82	0.48	<0.01		
6/25/2008	0.080	0.200	1.010	1.440	<0.01		
11/10/2008	1.800	1.600	15.200	9.200	0.060		
3/10/2009	0.030	0.04	0.28	0.320	<0.01		
7/29/2009	0.180	0.220	2.400	1.190	<0.01		
12/3/2009	<0.001	0.001	0.007	0.012	0.002		
5/20/2010							
10/6/2010	0.120	0.055	0.250	0.230	0.025		
12/7/2011	0.150	0.080	0.600	0.470	0.0197		
1/11/2012	0.019	0.016	0.035	0.183	<0.001		
9/14/2012	0.180	0.840	0.170	0.980	.00971		
6/12/2013	0.030	0.060	0.450	0.510	<.01		
8/28/2013	0.260	0.390	3.000	2.180	0.020		
12/3/2013	0.060	0.120	0.370	0.610	<0.01		
7/24/2014	0.320	0.250	1.500	1.600	.042		
11/5/2014	0.540	0.460	2.000	2.500	0.069	0.150	
2/17/2015	0.045	0.038	0.200	0.230	<0.005	0.011	
9/17/2015	0.803	0.418	2.700	2.380	0.0596	<0.250	
2/11/2016	0.198	0.125	0.714	0.763	0.0199	0.051	
6/21/2016	1.100	0.596	3.470	3.150	0.0986	0.218	
2/1/2017	0.567	0.631	2.720	3.280	<0.250	0.148	
6/21/2017	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005	
11/14/2017	0.036	0.057	0.153	0.352	<0.001	0.024	
7/26/2018							
11/27/2018	0.130	0.022	0.030	0.026	.0172	0.010	
3/21/2019	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005	

Well ID MW-10

**COC Concentration v. Time**



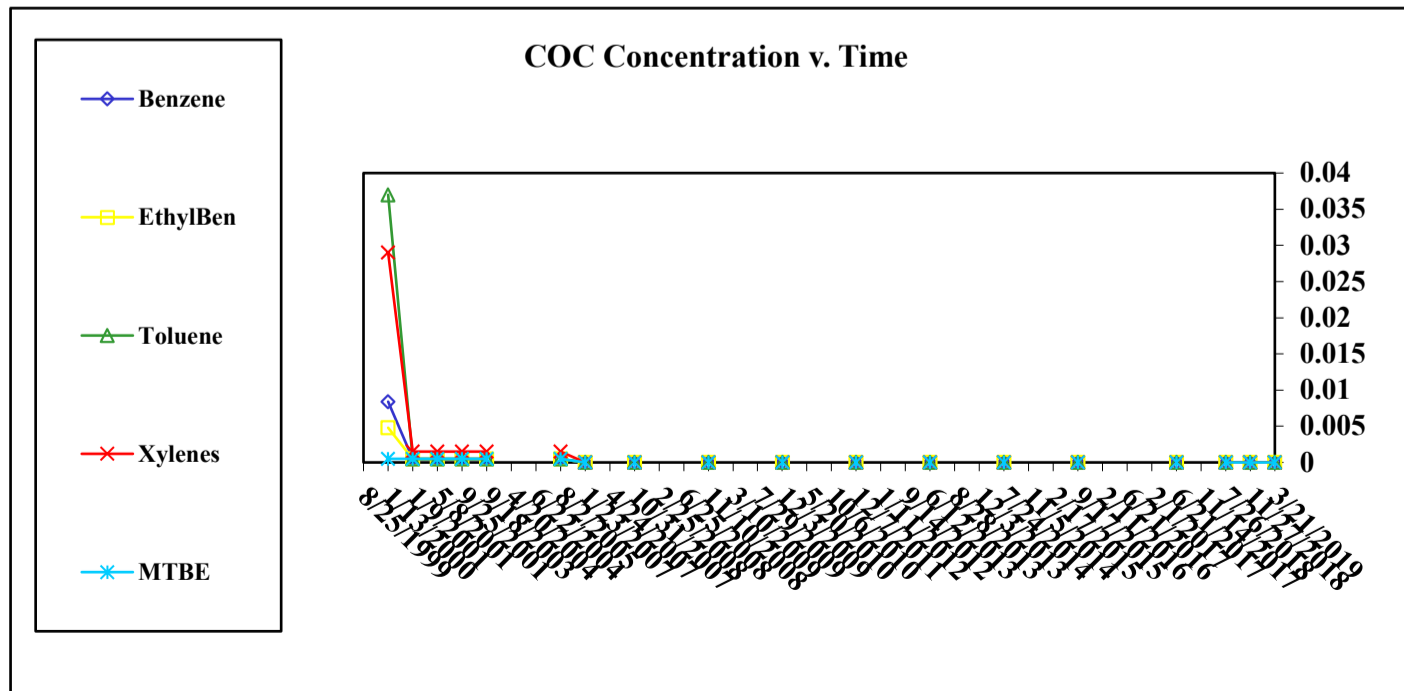
**NATURAL ATTENUATION MONITORING REPORT**

Facility Name: Doc's Grocery  
 Facility I. D. No.: 13652-015-012698  
 Incident No.: UST98-02-07  
 Consulting Firm: Poly/Spectrum

Year: 2018/2019  
 Sample Frequency: Triannual  
 Reporting period: 3 of 3  
 Project Manager: Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)									
Well ID MW-12									
Historical Chemicals of Concern Data									
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalene	not sampled		
8/25/1999							missing		
1/13/2000	0.0084	0.0048	0.037	0.029	0.0005		not existing		
1/9/2001	0.0005	0.0005	0.0005	0.0015	0.0005		Dry		
5/8/2001	0.0005	0.0005	0.0005	0.0015	0.0005		exceeded SSTLs		
9/25/2001	0.0005	0.0005	0.0005	0.0015	0.0005				
9/18/2003	0.0005	0.0005	0.0005	0.0015	0.0005				
4/20/2004									
6/22/2004									
8/2/2005	0.0005	0.0005	0.0005	0.0015	0.0005				
1/23/2007	<0.001	<0.001	<0.001	<0.003	<0.001				
4/24/2007									
10/31/2007	<0.001	<0.001	<0.001	<0.003	<0.001				
2/25/2008									
6/25/2008									
11/10/2008	<0.001	<0.001	<0.001	<0.003	<0.001				
3/10/2009									
7/29/2009									
12/3/2009	<0.001	<0.001	<0.001	<0.003	<0.001				
5/20/2010									
10/6/2010									
12/7/2011	<0.001	<0.001	<0.001	<0.003	<0.001				
1/11/2012									
9/14/2012									
6/12/2013	<0.001	<0.001	<0.001	<0.003	<0.001				
8/28/2013									
12/3/2013									
7/24/2014	<0.001	<0.001	<0.001	<0.003	<0.001				
11/5/2014									
2/17/2015									
9/17/2015	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005			
2/11/2016									
6/21/2016									
2/1/2017									
6/21/2017	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005			
11/14/2017									
7/26/2018	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005			
11/27/2018	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005			
3/21/2019	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005			

Well ID MW-12

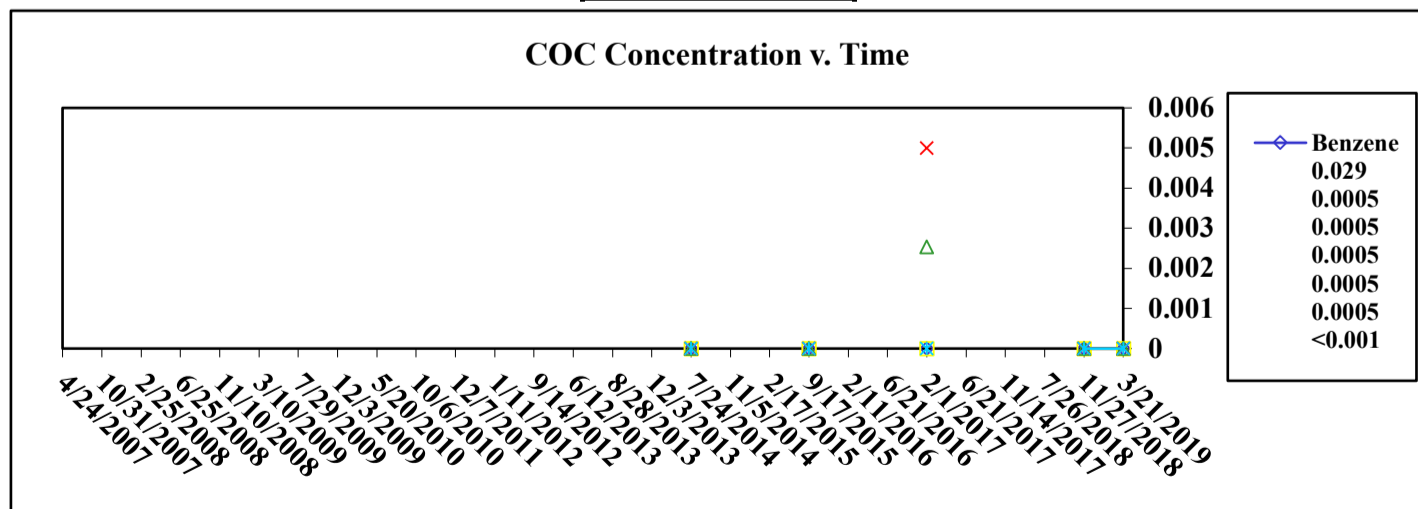


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)								
Well ID MW-13								
Historical Chemicals of Concern Data								
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalene		
8/25/1999							not sampled	
1/13/2000	0.029	0.11	0.089	0.059	0.0005		missing	
1/9/2001	0.0005	0.0005	0.00268	0.0059	0.0005		not existing	
5/8/2001	0.0005	0.0005	0.0005	0.0015	0.0005		Dry	
9/25/2001	0.0005	0.0005	0.0005	0.0015	0.0005		exceeded SSTLs	
9/18/2003	0.0005	0.0005	0.0005	0.0015	0.0005			
4/20/2004								
6/22/2004								
8/2/2005	0.0005	0.0005	0.0005	0.0015	0.0005			
1/23/2007	<0.001	<0.001	<0.001	<0.003	<0.001			
4/24/2007								
10/31/2007								
2/25/2008								
6/25/2008								
11/10/2008								
3/10/2009								
7/29/2009								
12/3/2009								
5/20/2010								
10/6/2010								
12/7/2011								
1/11/2012								
9/14/2012								
6/12/2013								
8/28/2013								
12/3/2013								
7/24/2014	<0.001	<0.001	<0.001	<0.003	<0.001			
11/5/2014								
2/17/2015								
9/17/2015	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005		
2/11/2016								
6/21/2016								
2/1/2017	<0.001	<0.001	0.003	0.005	<0.001	<0.005		
6/21/2017								
11/14/2017								
7/26/2018								
11/27/2018	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005		
3/21/2019	<0.001	<0.001	<0.005	<0.003	<0.001	<0.005		

**Well ID MW-13**

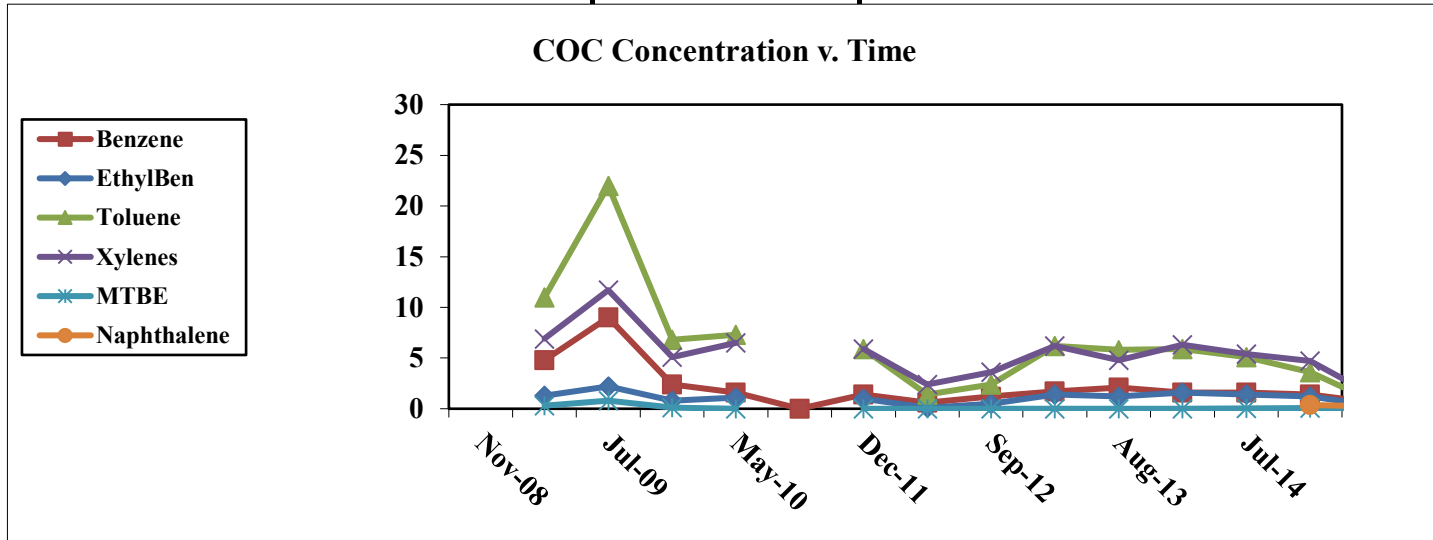


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)										
Well ID RW-1										
Historical Chemicals of Concern Data										
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	Naphthalene				
11/10/2008							not sampled			
3/10/2009	4.8	1.3	11	6.9	0.3		missing			
7/29/2009	9	2.2	22	11.7	0.8		not existing			
12/3/2009	2.4	0.8	6.8	5.1	0.1					
5/20/2010	1.6	1.1	7.3	6.5	<0.001		Dry			
10/6/2010	FREE PRODUCT (0.04 ft)						exceeded SSTLs			
12/7/2011	1.4	1	5.9	5.9	<0.1					
1/11/2012	0.6	0.1	1.4	2.4	<0.1					
9/14/2012	1.2	0.5	2.4	3.6	<0.1					
6/12/2013	1.7	1.4	6.2	6.2	<0.1					
8/28/2013	2.1	1.2	5.8	4.8	<0.1					
12/3/2013	1.6	1.6	5.9	6.3	<0.1					
7/24/2014	1.6	1.4	5.1	5.4	0.033					
11/5/2014	1.4	1.2	3.6	4.7	0.077	0.370				
2/17/2015	0.59	0.290	0.72	1.30	0.020	0.230				
9/17/2015	1.33	1.020	3.70	3.50	0.059	0.346				
2/11/2016	1.16	1.300	5.25	5.43	0.047	<1.00				
6/21/2016	1.24	0.619	2.79	2.01	0.037	0.422				
2/1/2017	1.14	1.680	3.31	6.28	0.048	0.388				
6/21/2017	2.69	2.320	11.2	11.00	0.075	0.913				
11/14/2017	3.35	2.370	4.5	10.60	0.064	0.618				
7/26/2018	3.02	2.160	10.6	7.68	<0.5	0.661				
11/27/2018	0.99	1.170	2.89	3.83	<0.001	0.755				
3/21/2019	0.44	0.962	1.84	3.01	<0.001	0.444				

Well ID RW-1



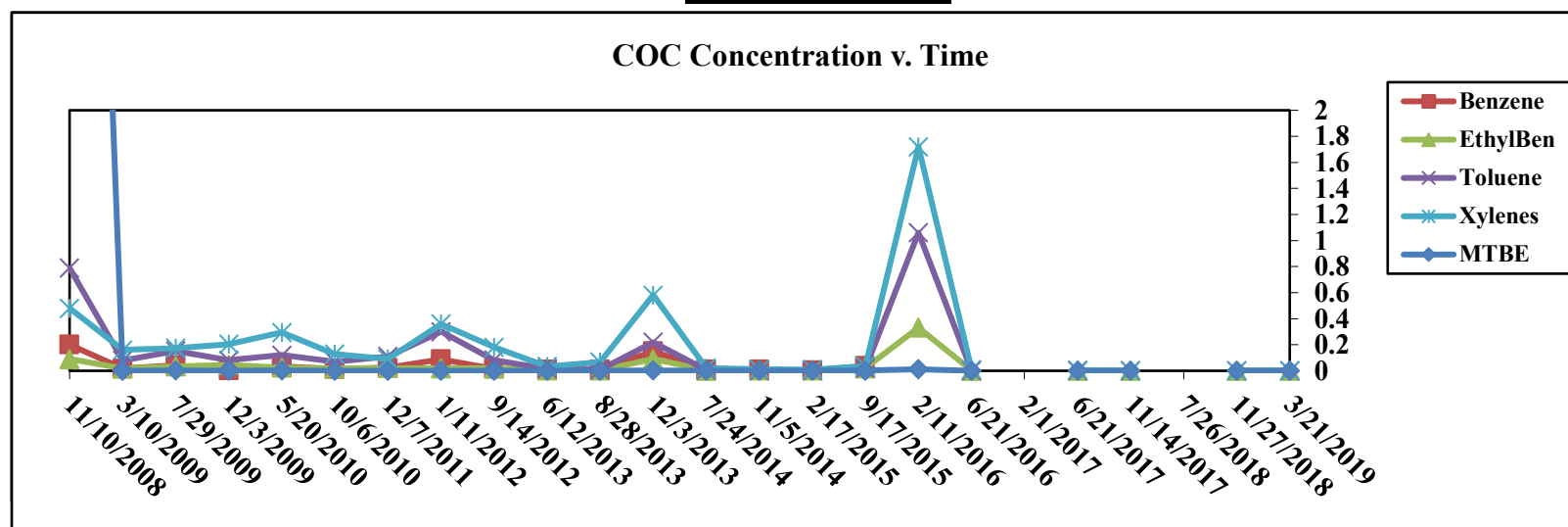
\*Concentrations with Yellow Background exceed the applicable Tier II SSTL.

**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)							
Well ID RW-2							
Historical Chemicals of Concern Data							
Date	Benzene	EthylBen	Toluene	Xylenes	MTBE	aphthalene	
11/10/2008	0.2	0.09	0.79	0.48	10.5		not sampled
3/10/2009	0.017	0.018	0.08	0.16	<0.001		missing
7/29/2009	0.043	0.033	0.152	0.173	0.004		not existing
12/3/2009	0.00263	0.0465	0.0807	0.205	<0.001		
5/20/2010	0.0329	0.0234	0.12	0.294	0.00344		Dry
10/6/2010	0.0134	0.018	0.07	0.128	<0.001		exceeded SSTLs
12/7/2011	0.0227	0.0204	0.11	0.0909	<0.001		
1/11/2012	0.089	0.0186	0.3	0.36	<0.001		
9/14/2012	0.0145	0.0196	0.0824	0.181	<0.001		
6/12/2013	0.0094	0.00356	0.0149	0.033	<0.001		
8/28/2013	0.00868	0.00416	0.00772	0.0676	<0.001		
12/3/2013	0.150	0.090	0.22	0.58	0.00208		
7/24/2014	0.011	0.002	0.007	0.021	<0.001		
11/5/2014	0.010	0.003	<0.001	0.011	<0.001	<0.001	
2/17/2015	0.0039	0.0029	<0.005	0.009	<0.005	<0.005	
9/17/2015	0.038	0.020	0.019	0.037	0.002	0.029	
2/11/2016	0.279	0.331	1.060	1.720	0.013	0.140	
6/21/2016	0.003	0.002	<0.005	0.009	<0.001	0.005	
2/1/2017							
6/21/2017	0.00729	<0.001	<0.001	0.006	<0.001	<0.005	
11/14/2017	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005	
7/26/2018							
11/27/2018	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005	
3/21/2019	<0.001	<0.001	<0.001	<0.003	<0.001	<0.005	

Well ID RW-2



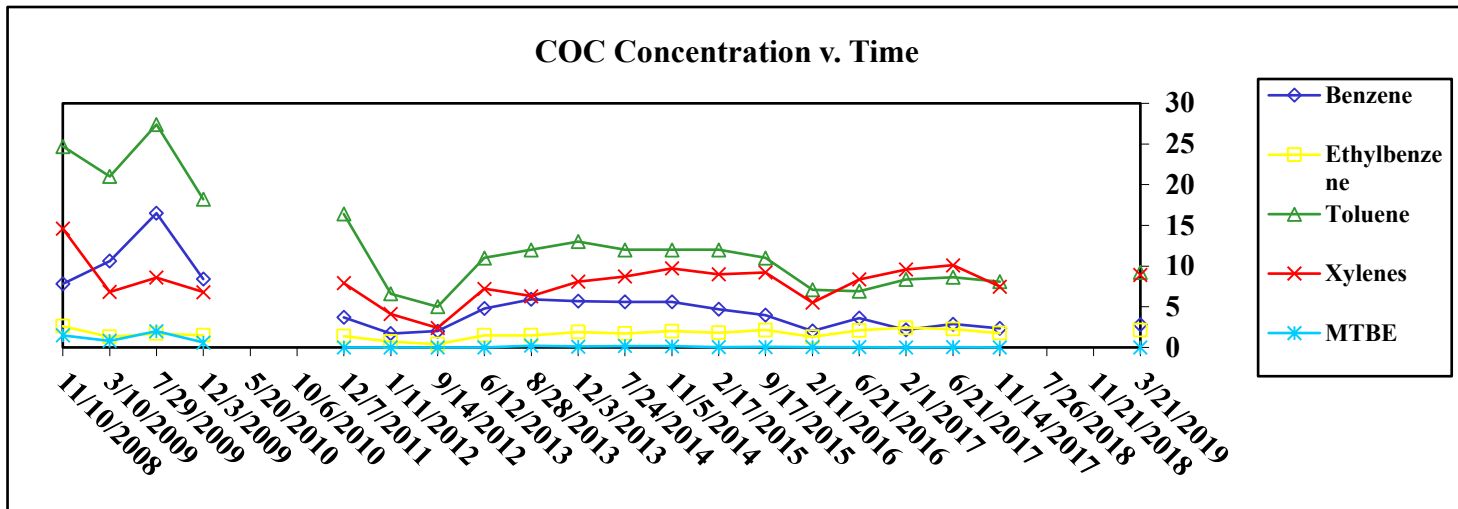
\*Concentrations with Yellow Background exceed the applicable Tier II SSTL.



**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:	2018/2019
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 6 - Historical Monitoring Well Chemicals of Concern Data (mg/L)										
Well ID RW-3										
Historical Chemicals of Concern Data										
Date	Benzene	Ethylbenzene	Toluene	Xylenes	MTBE	Naphthalene				
11/10/2008	7.8	2.6	24.7	14.6	1.5		not sampled			
3/10/2009	10.6	1.3	21	6.83	0.8		missing			
7/29/2009	16.5	1.7	27.4	8.6	2		not existing			
12/3/2009	8.4	1.5	18.2	6.8	0.6					
5/20/2010							Dry			
10/6/2010							exceeded SSTLs			
12/7/2011	3.7	1.4	16.4	7.9	<0.1					
1/11/2012	1.7	0.7	6.6	4.1	<0.1					
9/14/2012	2.0	0.4	5.0	2.4	<.1					
6/12/2013	4.8	1.5	11	7.2	<.1					
8/28/2013	5.9	1.5	12	6.3	0.2					
12/3/2013	5.7	1.9	13	8.1	0.1					
7/24/2014	5.6	1.7	12	8.7	0.16					
11/5/2014	5.6	2	12	9.7	0.15	0.620				
2/17/2015	4.7	1.8	12.0	9.0	0.052	0.520				
9/17/2015	3.970	2.140	11.000	9.230	0.061	0.676				
2/11/2016	2.020	1.310	7.080	5.510	0.031	<0.500				
6/21/2016	3.590	2.090	6.920	8.350	0.050	0.772				
2/1/2017	2.170	2.410	8.350	9.560	<0.0250	0.485				
6/21/2017	2.860	2.250	8.610	10.100	0.046	0.672				
11/14/2017	2.330	1.770	8.070	7.470	<0.100	0.510				
7/26/2018										
11/21/2018										
3/21/2019	2.800	2.120	9.210	8.920	<0.100	<0.500				



\*Concentrations with Yellow Background exceed the applicable Tier II SSTL.

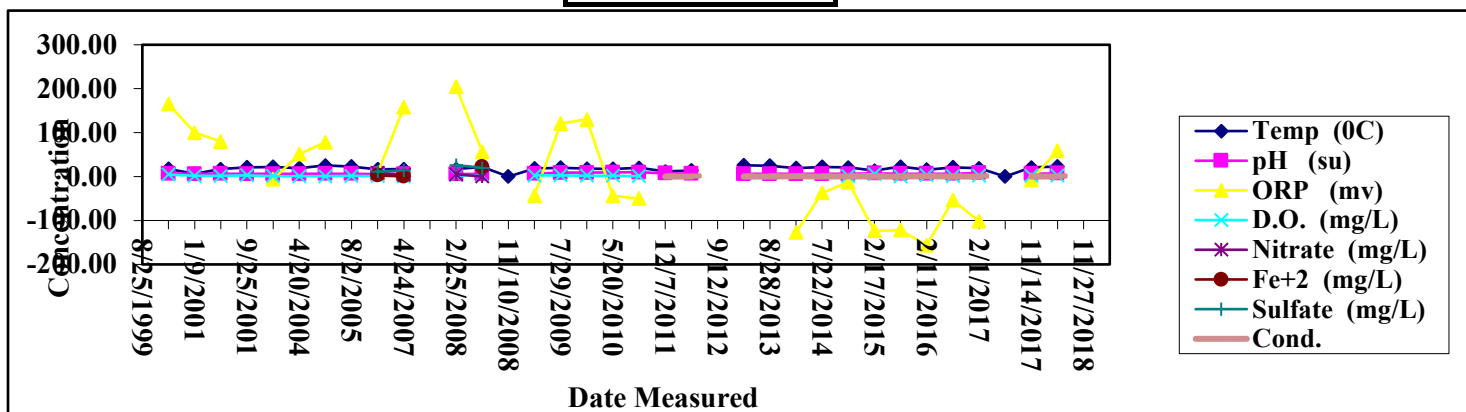
**NATURAL ATTENUATION MONITORING REPORT**

Facility Name: Doc's Grocery  
 Facility I. D. No.: 13652-015-012698  
 Incident No.: UST98-02-07  
 Consulting Firm: Poly/Spectrum

Year:(7th ) 2017  
 Sample Frequency: Triannual  
 Reporting period: 3 of 3  
 Project Manager: Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data									
Well ID MW-1									
Historical Intrinsic Groundwater Data									
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>2+</sup> (mg/L)	Sulfate (mg/L)	Cond.	
8/25/1999									not sampled
1/13/2000	17.6	7.18	165	4.5					missing
1/9/2001	6.6	6.18	100	1.39					not existing
5/8/2001	16.9	6.61	80	1.47					Dry
9/25/2001	21.1	6.29		2.79					no data
9/18/2003	22.2	5.97	-6	0.84					
4/20/2004	19.2	5.85	51	0.7					
6/22/2004	25	6.66	78	0.53					
8/2/2005	22.9	6.44		1.6					
1/23/2007	16.4	5.69	8	1.15	8.19	2.9	11.2		
4/24/2007	17	5.67	158	0.75	4.09	0.61	14.3		
10/31/2007									
2/25/2008	17.20	5.69	204	3.110	5.090		26.100		
6/25/2008	22.06	6.12	56	2.070	<0.5	22.0	19.700		
11/10/2008	initially purged dry								
3/10/09	18.50	6.69	-43.0	2.300					
7/29/09	20.04	8.73	121.0	3.020					
12/3/09	18.00	8.69	130.0	1.770					
5/20/10	17.43	9.61	-44.0	1.870					
10/6/10	19.56	9.50	-50.0	1.100					
12/7/11	11.40	7.44						0.224	
1/11/12	13.80	6.66						0.282	
9/12/12									
6/12/13	25.70	5.88						0.149	
8/28/13	24.90	6.15						0.248	
12/3/13	19.41	6.08	-127.3					0.384	
7/22/14	21.83	5.93	-37.3					0.277	
11/5/14	20.85	6.05	-12.9	1.520				0.398	
2/17/15	13.15	7.60	-123.6	5.610				0.328	
9/17/15	22.34	6.46	-121.8	0.140				0.331	
2/11/16	15.78	6.69	-156.5	3.180				0.381	
6/21/16	20.88	6.69	-53.5	1.030				0.364	
2/1/17	18.61	8.43	-101.7	2.460				0.221	
6/21/17	Intrinsic Parameter Meter Failed								
11/14/17	20.81	6.73	-7.5	2.470				0.154	
7/26/18	22.88	7.22	59.0	2.620				0.133	
11/27/18									
3/21/19									

Well ID MW-1

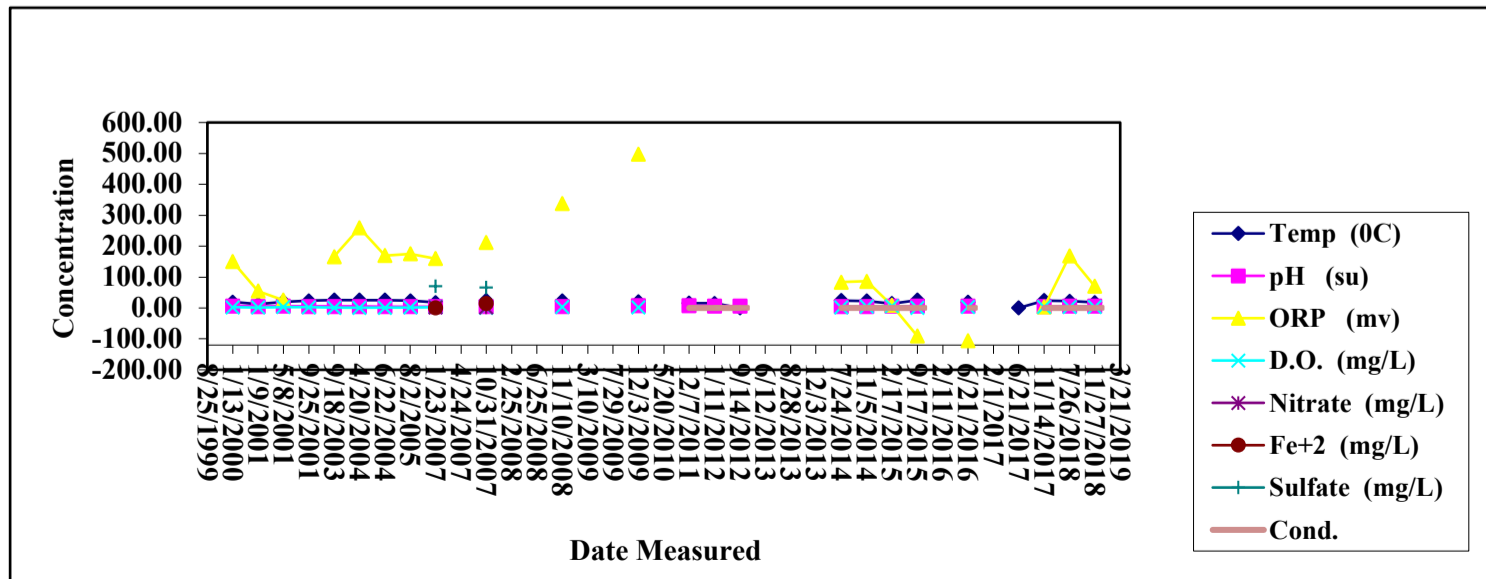


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data									
Well ID MW-2									
Historical Intrinsic Groundwater Data									
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Cond.	
8/25/1999									not sampled
1/13/2000	19.3	6.46	150	2.5					missing
1/9/2001	12.3	5.36	55	1.56					not existing
5/8/2001	19.4	6.17	25	2.89					Dry
9/25/2001	23.2	5		2.31					no data
9/18/2003	25.6	5.1	166	1.12					
4/20/2004	25	5.03	259	0.88					
6/22/2004	25	4.22	170	0.92					
8/2/2005	23.1	4.54	175	2.07					
1/23/2007	17.5	4.73	160	3.29	2.11	0.073	70.2		
4/24/2007									
10/31/2007	24.05	4.41	212.00	1.11	1.38	14.00	65.80		
2/25/2008									
6/25/2008									
11/10/2008	23.09	4.230	338.000	3.910					
3/10/2009									
7/29/2009									
12/3/2009	19.84	7.360	498.000	1.810					
5/20/2010									
12/7/2011	15.70	6.970						0.02	
1/11/2012	14.80	6.560						0.18	
9/14/2012		5.890						0.18	
6/12/2013									
8/28/2013									
12/3/2013									
7/24/2014	23.66	4.370	83.400	2.350				0.20	
11/5/2014	22.83	4.620	86.500	4.630				0.25	
2/17/2015	14.24	5.770	8.800	5.810				0.19	
9/17/2015	25.07	6.100	-90.900	0.940				0.22	
2/11/2016									
6/21/2016	18.51	6.550	-106.200	3.530				0.24	
2/1/2017									
6/21/17	Intrinsic Parameter Meter Failed								
11/14/2017	23.590	4.690	2.740	2.740				0.121	
7/26/2018	22.020	6.140	169.100	2.770				0.154	
11/27/2018	17.850	5.750	69.900	3.710				0.101	
3/21/2019									

Well ID MW-2

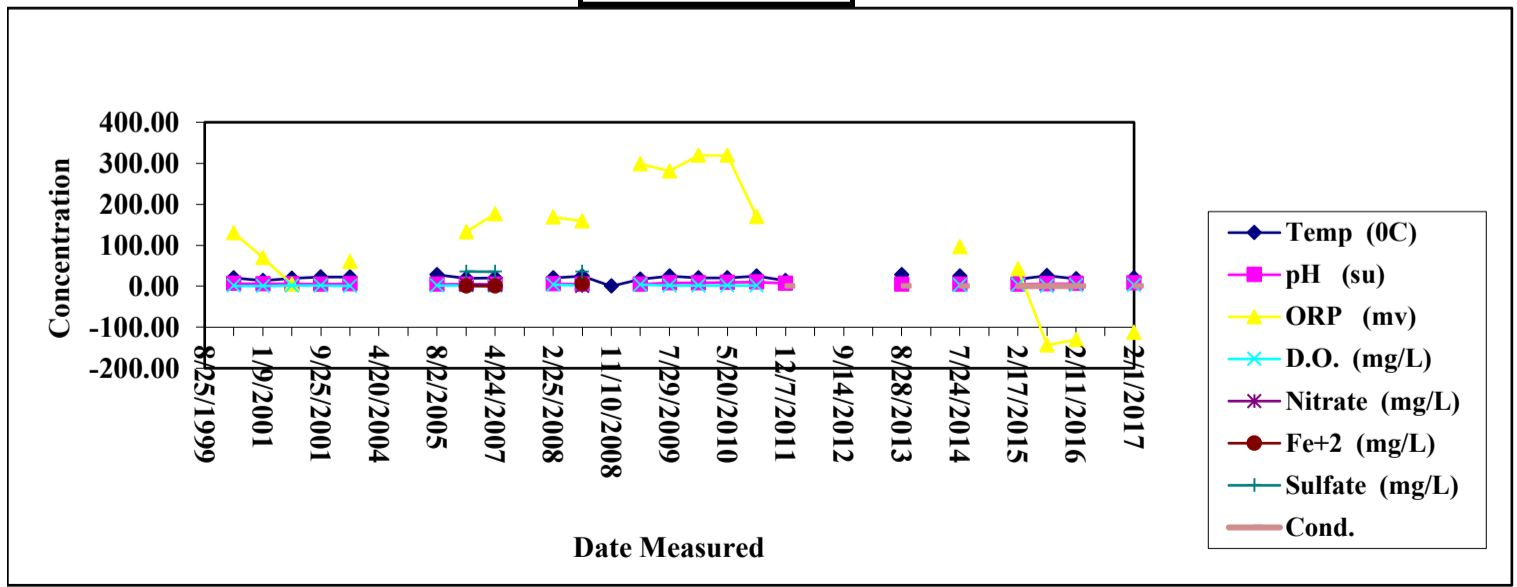


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data										
Well ID MW-3										
Historical Intrinsic Groundwater Data										
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Cond.		
8/25/1999										not sampled
1/13/2000	20.1	6.56	130	1						missing
1/9/2001	13.7	6.06	70	0.64						not existing
5/8/2001	19.6	6.42	5	1.2						Dry
9/25/2001	22.3	5.11		1.99						no data
9/18/2003	22.7	5.67	60	0.59						
4/20/2004										
6/22/2004										
8/2/2005	28.2	4.77		1.95						
1/23/2007	18.8	4.87	132	1.46	3.96	0.45	36			
4/24/2007	19.8	4.7	176	0.84	3.18	0.16	35.2			
10/31/2007										
2/25/2008	20.50	5.680	169.000	3.290						
6/25/2008	25.02	5.31	159	1.59	0.59	6.20	35.80			
11/10/2008	initially purged dry									
3/10/2009	17.02	5.150	298.0	3.27						
7/29/2009	24.53	8.000	281.0	1.92						
12/3/2009	20.20	7.880	319.0	1.59						
5/20/2010	20.03	8.870	319.0	1.59						
10/6/2010	25.04	10.010	170.0	1.13						
12/7/2011	14.10	7.010						0.145		
1/11/2012										
9/14/2012										
6/12/2013										
8/28/2013	28.100	5.190						0.090		
12/3/2013										
7/24/2014	24.840	4.480	95.6	2.21				0.124		
11/5/2014										
2/17/2015	16.610	5.160	41.9	3.74				0.125		
9/17/2015	26.060	6.240	-143.6	0.63				0.145		
2/11/2016	17.690	6.510	-130.5	2.36				0.175		
6/21/2016										
2/1/2017	20.450	7.960	-113.0	2.63				0.145		
6/21/2017	Intrinsic Parameter Meter Failed									
11/14/2017										
7/26/2018										
11/27/2018										
3/21/2018	15.430	6.910	108.9	2.33				0.037		

**Well ID MW-3**

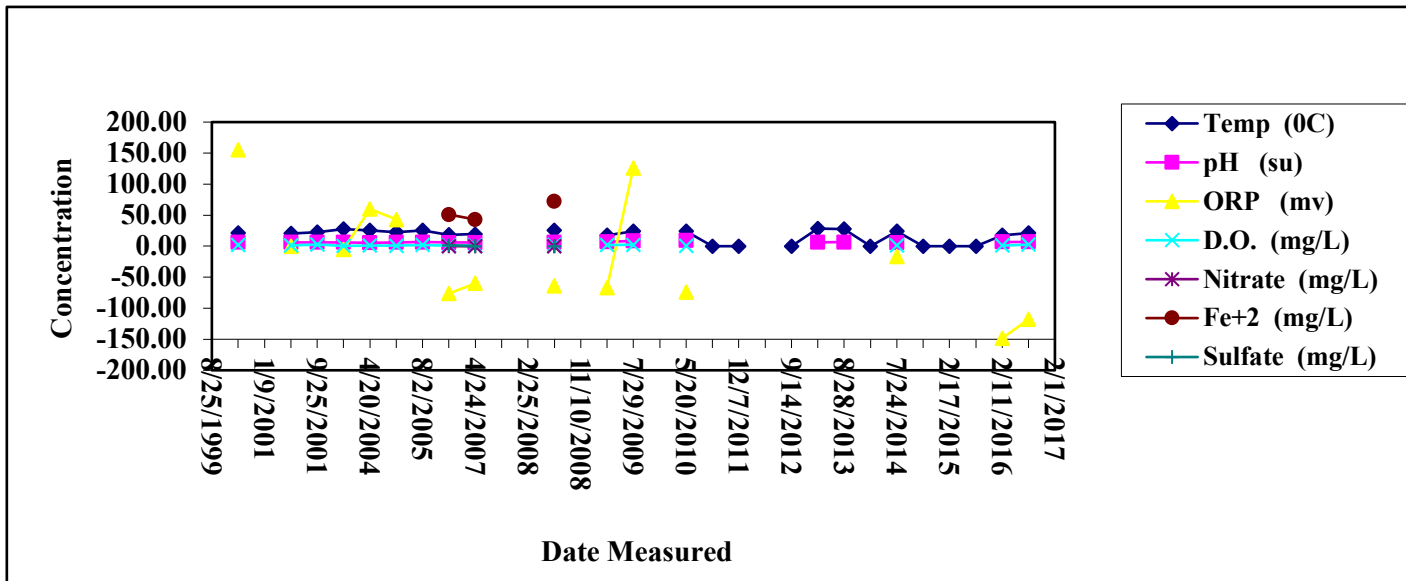


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data									
Well ID MW-4									
Historical Intrinsic Groundwater Data									
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Conductivity	
8/25/1999									not sampled
1/13/2000	21	6.48	155	2					missing
1/9/2001									not existing
5/8/2001	20.3	6.34	0	1.32					Dry
9/25/2001	22.4	5.96		2.67					no data
9/18/2003	27.6	6.01	-5	0.46					
4/20/2004	25.5	5.42	60	1					
6/22/2004	22.5	6.09	43	0.77					
8/2/2005	25.4	6.5		1.61					
1/23/2007	18.3	5.73	-76	1.37	<0.50	51	1.49		
4/24/2007	19.5	5.86	-60	1.14	<1.0	43	<1.0		
10/31/2007									
2/25/2008									
6/25/2008	25.64	6.44	-64	1.68	<0.50	72.0	<5.0		
11/10/2008									
3/10/2009	17.74	7.05	-67	1.87					
7/29/2009	24.02	8.730	126.000	2.240					
12/3/2009									
5/20/2010	23.88	9.080	-74.000	0.850					
10/6/2010	DRY								
12/7/2011	DRY								
1/11/2012	DRY								
9/14/2012	DRY								
6/12/2013	28.400	6.170						0.107	
8/28/2013	27.600	6.430						0.230	
12/3/2013	DRY								
7/24/2014	24.200	5.820	-16.500	1.490				0.224	
11/5/2014	DRY								
2/17/2015	DRY								
9/17/2015	Not Sampled - Free Product Sheen								
2/11/2016	17.660	6.640	-148.300	1.290				0.399	
6/21/2016	21.420	6.670	-117.800	2.450				0.371	
2/1/2017									
6/21/17	Intrinsic Parameter Meter Failed								
11/14/2017	23.630	6.960	-1.800	1.300				0.223	
7/26/2018	24.330	7.190	55.600	1.660				0.187	
11/27/2018									
3/21/2019									

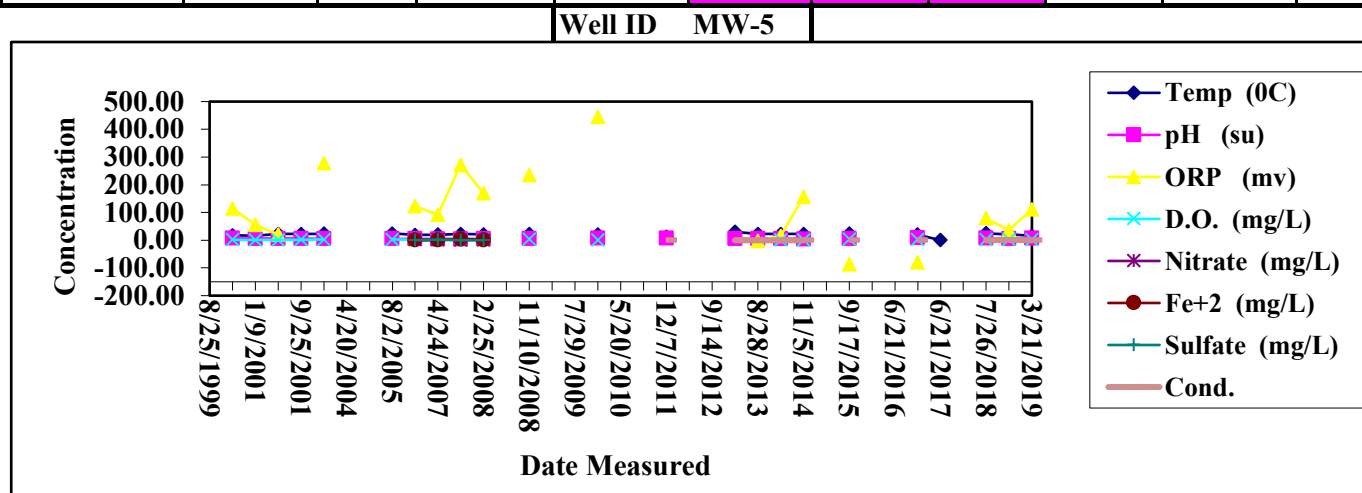
Well ID MW-4



**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	1st of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data										
Well ID MW-5										
Historical Intrinsic Groundwater Data										
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Cond.		
8/25/1999										not sampled
1/13/2000	17.1	6.71	115	2						missing
1/9/2001	15.8	5.69	55	0.91						not existing
5/8/2001	22	6.02	20	1.27						Dry
9/25/2001	22.2	5.57		1.98						no data
9/18/2003	23.3	4.93	278	2.46						
4/20/2004										
6/22/2004										
8/2/2005	24.6	4.94		2.74						
1/23/2007	19.7	5.04	123	1.63	2.13	0.11	<0.001			
4/24/2007	20.2	4.76	92	1.61	2.12	<0.050	1.81			
10/31/2007	22.85	4.52	272	1.49	1.27	4.8	<1.0			
2/25/2008	20.60	5.07	169.0	2.00	0.760	0.610	<0.005			
6/25/2008										
11/10/2008	22.11	5.110	235.0	3.340						
3/10/2009										
7/29/2009										
12/3/2009	20.96	7.830	445.00	1.02						
5/20/2010										
10/6/2010										
12/7/2011	11.700	7.790						0.06		
1/11/2012										
9/14/2012										
6/12/2013	30.000	5.140						0.07		
8/28/2013	23.020	5.240	-3.00					0.105		
7/24/2014	22.070	5.690	16.00	1.07				0.121		
11/5/2014	22.410	4.750	156.40	1.39				0.101		
2/17/2015										
9/17/2015	23.540	6.190	-87.20	4.32				0.087		
2/11/2016										
6/21/2016										
2/1/2017	20.04	8.240	-80.3	2.65				0.07		
6/21/2017	Intrinsic Parameter Meter Failed									
11/14/2017	Intrinsic Parameter Meter Failed									
7/26/2018	24.72	6.790	79.6	2.25				0.07		
11/27/2018	20.68	6.520	35.9	2.89				0.730		
3/21/2019	15.38	6.670	111.6	1.89				0.019		

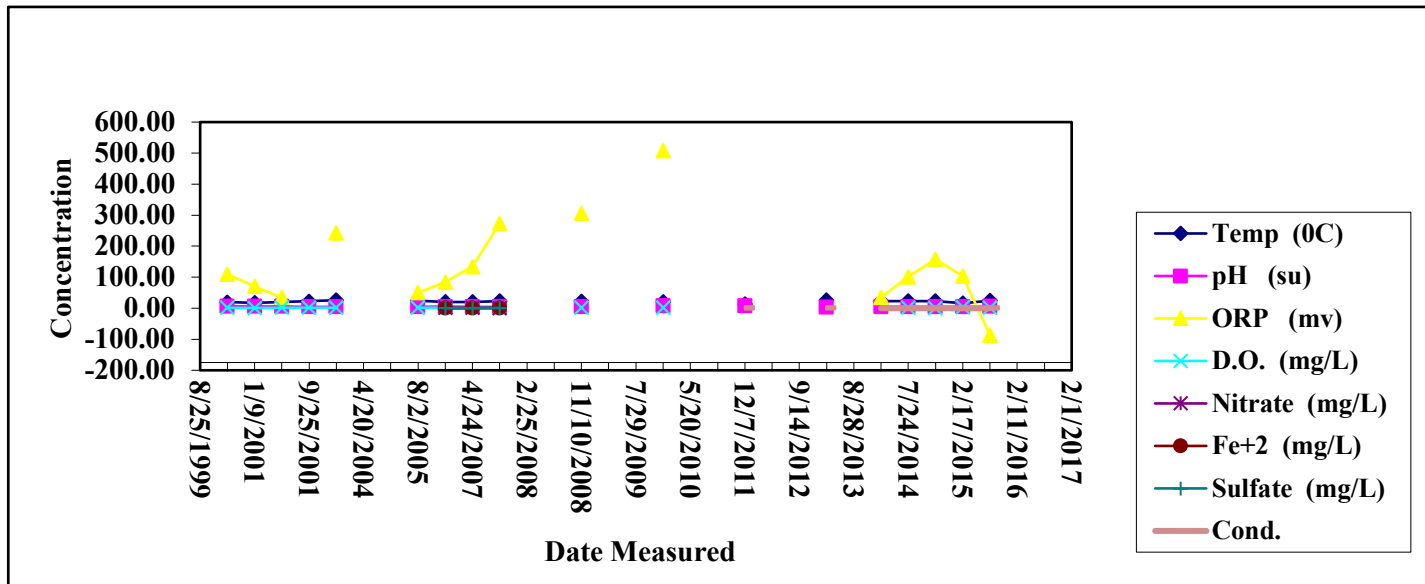


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	1st of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data									
Well ID MW-8									
Historical Intrinsic Groundwater Data									
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Cond.	
8/25/1999									not sampled
1/13/2000	19.6	6.28	110	1.75					missing
1/9/2001	17.1	5.58	70	0.81					not existing
5/8/2001	19.8	6.23	35	1.57					Dry
9/25/2001	22.5	4.92		1.98					no data
9/18/2003	25.9	4.85	242	1.2					
4/20/2004									
6/22/2004									
8/2/2005	24.3	4.94	50	1.55					
1/23/2007	20.1	5.13	84	1.55	1.26	0.18	<0.001		
4/24/2007	20.3	4.64	134	1.66	1.21	<0.050	<1.0		
10/31/2007	23.53	4.38	272.00	1.22	0.77	1.10	1.11		
2/25/2008									
6/25/2008									
11/10/2008	22.19	4.51	305.0	1.7					
3/10/2009									
7/29/2009									
12/3/2009	20.85	7.59	507.000	1.52					
5/20/2010									
10/6/2010									
12/7/2011	12.900	7.02						0.089	
1/11/2012									
9/14/2012									
6/12/2013	26.00	3.97						0.03	
8/28/2013									
12/3/2013	23.360	5.05	34.4					0.094	
7/24/2014	23.090	4.33	101.3	1.45				0.088	
11/5/2014	23.120	4.46	158.3	1.10				0.114	
2/17/2015	16.110	4.60	103.1	3.57				0.089	
9/17/2015	24.520	6.06	-86.3	1.62				0.097	
2/11/2016									
6/21/2016									
2/1/2017									
6/21/2017	Intrinsic Parameter Meter Failed								
11/14/2017	Intrinsic Parameter Meter Failed								
7/26/2018	24.56	6.510	94.3	1.9				0.052	
11/27/2018	19.31	6.250	49.9	2.8				0.059	
3/21/2019	16.40	7.050	103.0	4.8				0.049	

Well ID MW-8

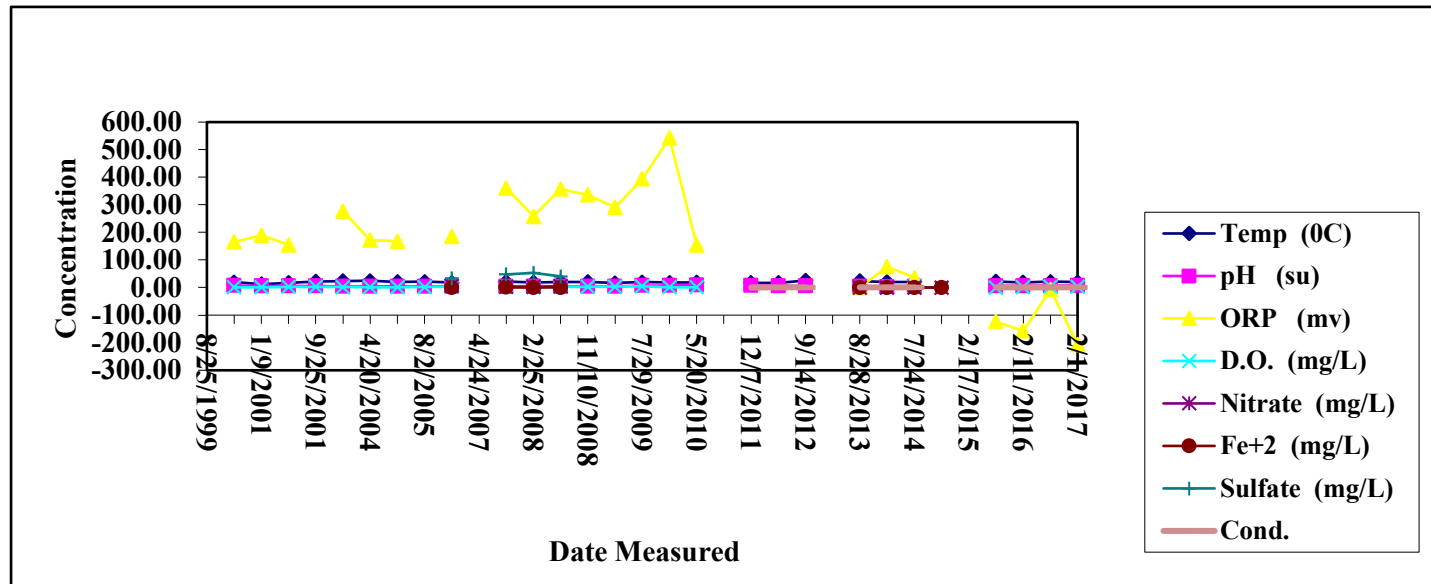


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data									
Well ID MW-9									
Historical Intrinsic Groundwater Data									
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Cond.	
8/25/1999									not sampled
1/13/2000	19.6	7.12	165	0.5					missing
1/9/2001	12.1	5.47	190	0.96					not existing
5/8/2001	17.6	6.13	155	2.59					Dry
9/25/2001	21.6	5.38		2.48					no data
9/18/2003	23.7	4.14	277	1.72					
4/20/2004	24.5	4.01	172	0.83					
6/22/2004	20.1	4	168	0.46					
8/2/2005	21.3	4.39		1.96					
1/23/2007	17.8	4.63	185	2.09	5.85	0.13	32.7		
4/24/2007									
10/31/2007	21.16	4.01	361	3.77	3.41	0.53	48.2		
2/25/2008	18.40	5.06	258	1.67	2.08	<0.05	53.30		
6/25/2008	20.06	4.47	357	2.19	4.58	0.33	40.50		
11/10/2008	20.08	4.01	336	3.04					
3/10/2009	16.22	4.56	291	3.26					
7/29/2009	19.51	7.84	394	4.50					
12/3/2009	18.16	7.21	543	1.53					
5/20/2010	18.52	9.29	155	1.19					
10/6/2010									
12/7/2011	17.3	7.66						0.117	
1/11/2012	17.00	6.780						0.175	
9/14/2012	25.40	6.000						0.183	
6/12/2013									
8/28/2013	24.1	4.11						0.217	
12/3/2013	20.69	3.47	75.3					0.243	
7/24/2014	20.53	4.84	35.6	3.44				0.193	
11/5/2014									
2/17/2015									
9/17/2015	21.67	6.31	-123.1	0.29				0.211	
2/11/2016	18.4	6.61	-157.3	1.84				0.263	
6/21/2016	21.4	6.58	-6.9	2.55				0.242	
2/1/2017	19.72	8.35	-206.4	2.77				0.193	
6/21/17	Intrinsic Parameter Meter Failed								
11/14/2017	21.21	6.13	-1.00	1.54				0.125	
7/26/2018	22.66	7.49	54.60	2.93				0.040	
11/27/2018	17.47	6.08	56.10	3.77				0.098	
3/21/2019	15.23	6.99	114.40	6.73				0.043	

Well ID MW-9

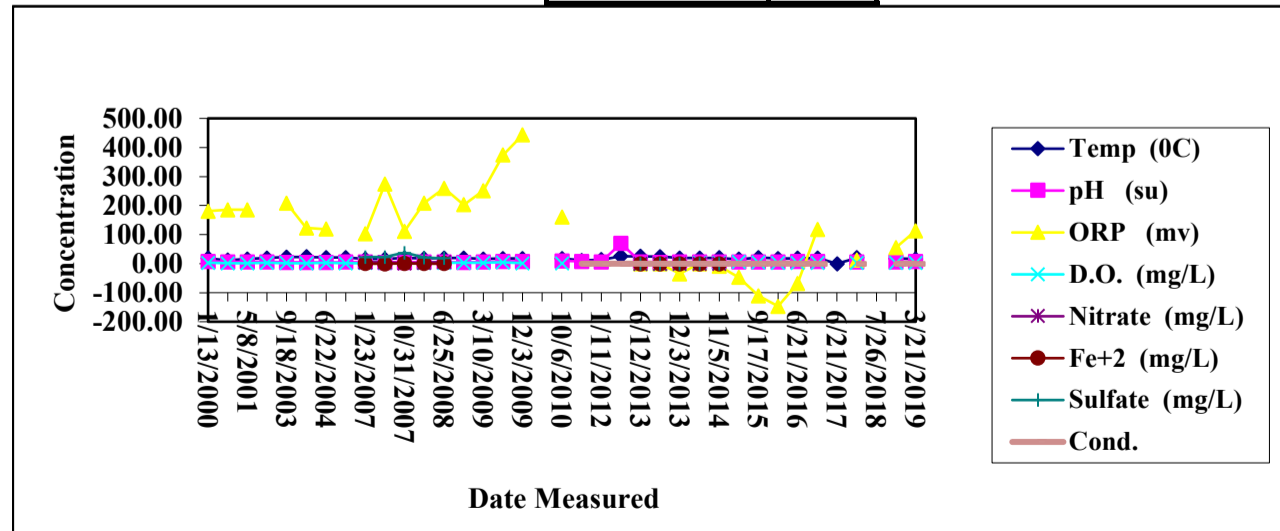




**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

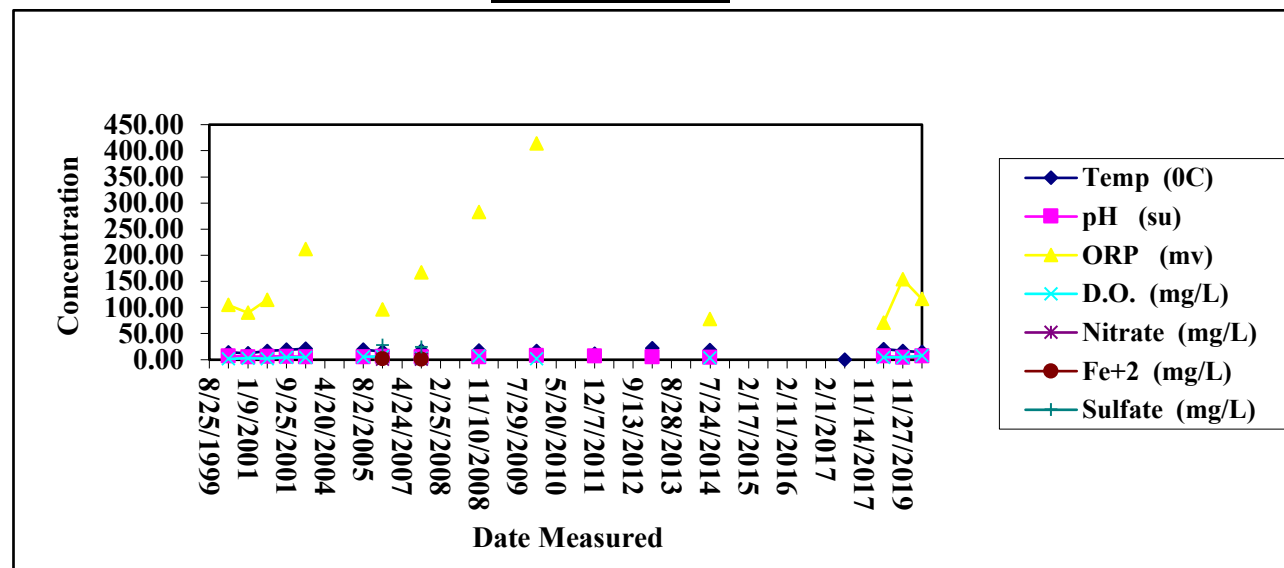
Section 7 - Historical Monitoring Well Intrinsic Groundwater Data										
Well ID MW-10										
Historical Intrinsic Groundwater Data										
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Cond.		
8/25/1999										not sampled
1/13/2000	18.5	7.8	180	2.5						missing
1/9/2001	11.8	5.59	185	1.14						not existing
5/8/2001	16.6	6.15	185	1.36						Dry
9/25/2001	18.8	5.87		2.38						no data
9/18/2003	22.4	4.81	209	1.96						
4/20/2004	23.5	4.83	123	0.7						
6/22/2004	21.4	4.14	119	3.34						
8/2/2005	20.4	5.52		1.9						
1/23/2007	16.5	5.46	103	2.11	4.28	0.29	22.1			
4/24/2007	16.6	5.13	274	2.57	5.02	0.05	22.9			
10/31/2007	19.24	4.81	111		1.73	0.75	38.10			
2/25/2008	17.5	5.48	209	2.3	3.38	0.52	21.60			
6/25/2008	19.93	5.35	260	2.95	5.82	0.30	18.70			
11/10/2008	19.13	5.130	203	3.250						
3/10/2009	15.57	5.43	251	3.34						
7/29/2009	18.21	8.23	374	3.960						
12/3/2009	17.38	8.14	443	1.510						
5/20/2010										
10/6/2010	18.340	9.58	161.000	1.540						
12/7/2011	11.000	7.39						0.100		
1/11/2012	13.600	6.37						0.209		
9/13/2012	25.60	69.40						0.176		
6/12/2013	25.30	5.65						0.131		
8/28/2013	24.60	5.12						0.152		
12/3/2013	19.79	5.55	-34.40					0.185		
7/24/2014	19.52	5.87	-0.20	3.50				0.211		
11/5/2014	20.11	6.35	-8.50	3.04				0.219		
2/17/2015	15.20	6.72	-47.10	5.21				0.133		
9/17/2015	20.51	6.39	-110.40	3.89				0.183		
2/11/2016	17.16	6.63	-146.70	3.43				0.280		
6/21/2016	18.50	6.85	-68.10	3.00				0.235		
2/1/2017	18.75	8.38	117.20	2.54				0.144		
6/21/17	Intrinsic Parameter Meter Failed									
11/14/2017	20.17	6.30	13.0	1.97				0.105		
7/26/2018										
11/27/2018	17.65	6.15	56.0	2.31				0.147		
3/21/2019	15.80	6.97	112.6	3.08				0.029		



**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data									
Well ID MW-12									
Historical Intrinsic Groundwater Data									
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>2+</sup> (mg/L)	Sulfate (mg/L)	Cond.	
8/25/1999									not sampled
1/13/2000	14.4	7.1	105	1.5					missing
1/9/2001	12.1	5.59	90	3.08					not existing
5/8/2001	17.1	6.55	115	2.25					Dry
9/25/2001	19	6.21		4.83					no data
9/18/2003	21.2	5.32	212	4.8					
4/20/2004									
6/22/2004									
8/2/2005	19.4	5.65		5.37					
1/23/2007	15.6	6	96	6.55	1.31	1.6	28.2		
4/24/2007									
10/31/2007	18.0	4.95	167	2.36	0.960	1.400	24.800		
2/25/2008									
6/25/2008									
11/10/2008	17.5	5.04	283	7.08					
3/10/2009									
7/29/2009									
12/3/2009	16.5	8.14	414	2.29					
5/20/2010									
10/6/2010									
12/7/2011	11.1	7.550						0.121	
1/11/2012									
9/13/2012									
6/12/2013	22.0	5.45						0.161	
8/28/2013									
12/3/2013									
7/24/2014	18.61	4.8	78.4	3.72				0.218	
11/5/2014									
2/17/2015									
9/17/2015									
2/11/2016									
6/21/2016									
2/1/2017									
6/21/17	Intrinsic Parameter Meter Failed								
11/14/2017									
7/26/2018	20.49	7.26	71.1	4.52				0.087	
11/27/2019	16.83	4.70	154	4.79				0.103	
3/21/2019	14.64	6.90	116.3	7.62				0.031	

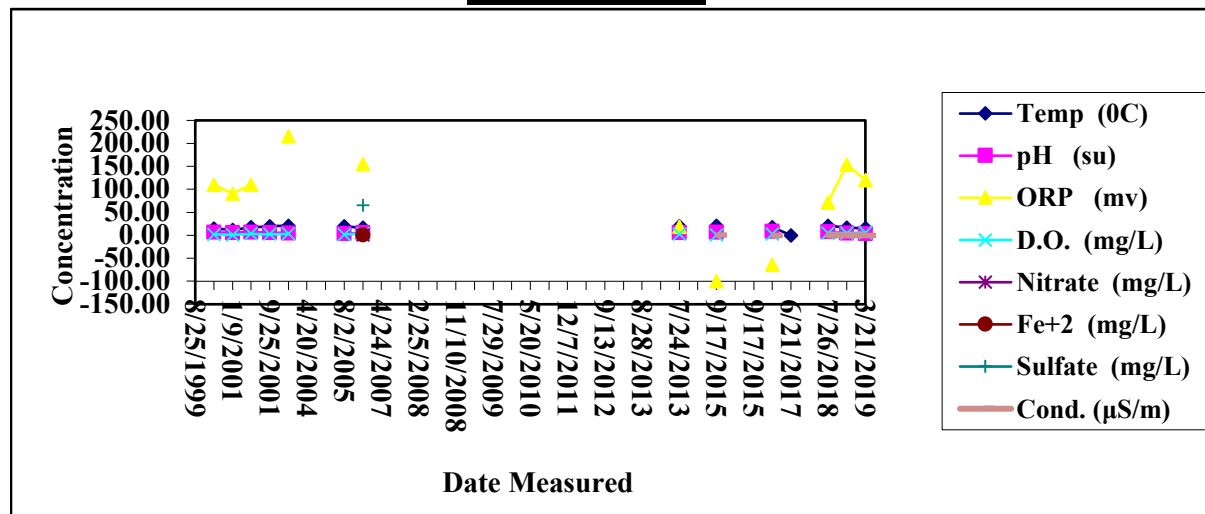


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data										
Well ID MW-13										
Historical Intrinsic Groundwater Data										
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Cond. (µS/m)		
8/25/1999										not sampled
1/13/2000	15	6.2	110	1.75						missing
1/9/2001	11.6	5.69	90	0.99						not existing
5/8/2001	17.3	6.5	110	3.37						Dry
9/25/2001	19.6	6.01		2.2						no data
9/18/2003	21	4.74	216	3.27						
4/20/2004										
6/22/2004										
8/2/2005	19.8	3.86		2.06						
1/23/2007	16.2	5.16	155	3.88	0.76	0.16	65.6			
4/24/2007										
10/31/2007										
2/25/2008										
6/25/2008										
11/10/2008										
3/10/2009										
7/29/2009										
12/3/2009										
5/20/2010										
10/6/2010										
12/7/2011										
1/11/2012										
9/13/2012										
6/12/2013										
8/28/2013										
12/3/2013										
7/24/2013	19.21	5.61	19	3.07						
2/17/2015										
9/17/2015	21.02	6.4	-99.9	1.11				0.202		
2/11/2016										
9/17/2015										
2/1/2017	17.48	8.160	-64.0	2.97				0.117		
6/21/17	Intrinsic Parameter Meter Failed									
11/14/2017										
7/26/2018	20.49	7.26	71.1	4.52				0.087		
11/27/2018	16.83	4.70	154.0	4.79				0.103		
3/21/2019	15.31	3.88	120.0	5.91				0.032		

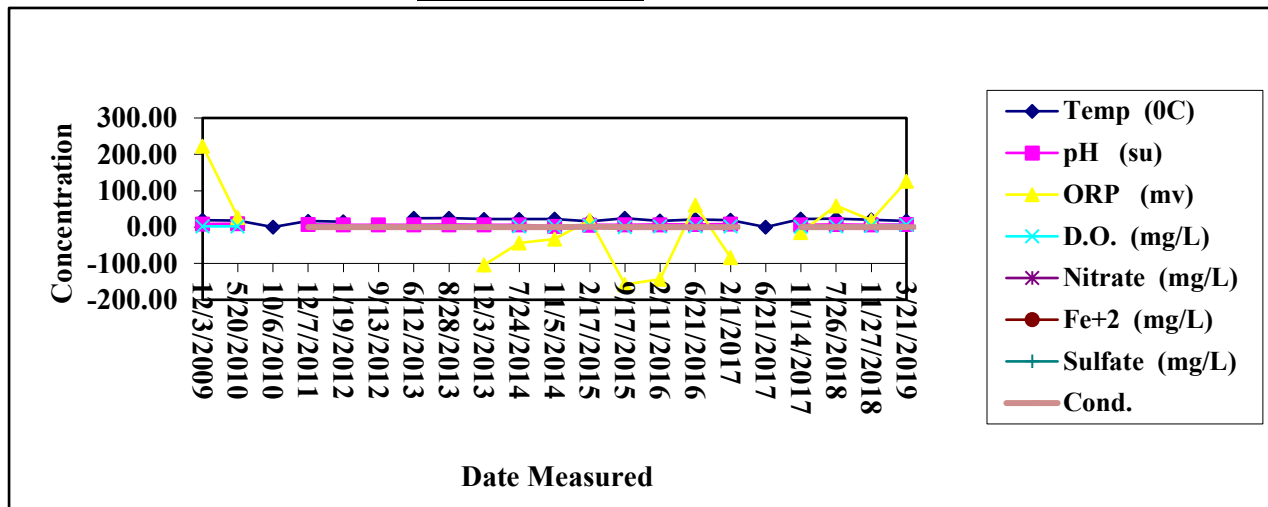
**Well ID MW-13**



**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data										
Well ID RW-1										
Historical Intrinsic Groundwater Data										
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Cond.		
11/10/2008										not sampled
3/10/2009	16.72	6.06	67	2.29						not sampled
7/29/2009	21.07	8.65	303	3.95						not existing
12/3/2009	19.27	8.48	223	1.67						
5/20/2010	18.37	9.46	27	1.64						Dry
10/6/2010	FREE PRODUCT (0.04 ft)									no data
12/7/2011	16.3	7.29						0.131		
1/19/2012	14.8	6.7						0.164		
9/13/2012		6.35						0.103		
6/12/2013	24.3	6.05						0.105		
8/28/2013	24.8	6.9						0.1955		
12/3/2013	21.67	6.06	-103.9					0.224		
7/24/2014	21.66	6.07	-43.3	2.44				0.203		
11/5/2014	21.88	2.29	-32.9	2.290				0.259		
2/17/2015	15.9	5.71	19	4.640				0.751		
9/17/2015	24.24	6.65	-157.9	0.280				0.239		
2/11/2016	17.06	6.83	-142.8	2.46				0.349		
6/21/2016	20.75	7.03	60.8	2.46				0.315		
2/1/2017	19.20	8.34	-84.2	2.28				0.142		
6/21/17	Intrinsic Parameter Meter Failed									
11/14/2017	22.50	6.70	-14.7	1.39				0.169		
7/26/2018	22.90	7.19	58.8	2.64				0.176		
11/27/2018	20.31	6.69	18.4	2.84				0.107		
3/21/2019	16.55	6.91	126.3	6.56				0.046		

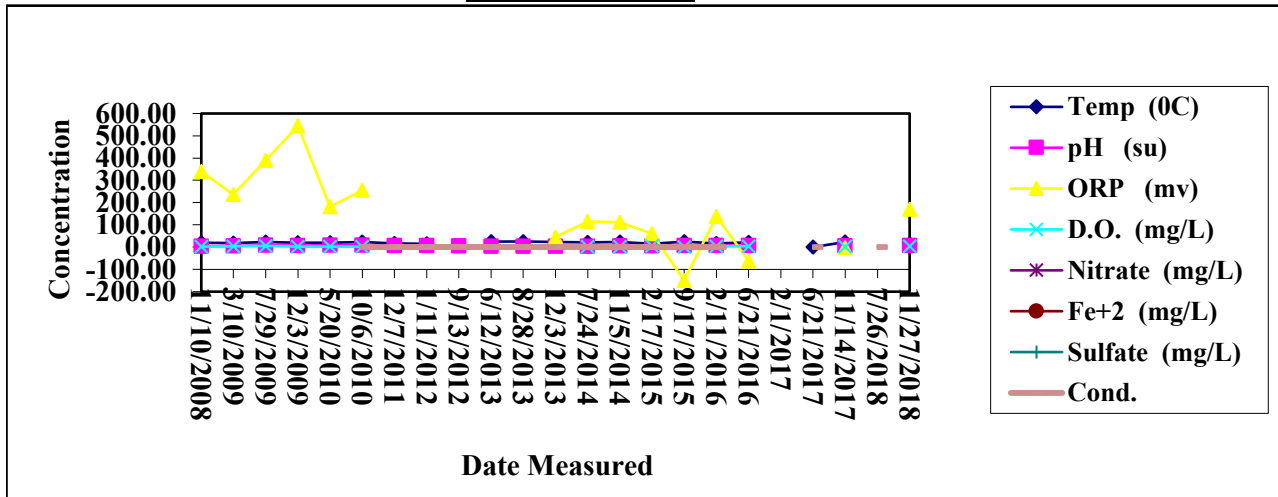


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data									
Well ID RW-2									
Historical Intrinsic Groundwater Data									
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Cond.	
11/10/2008	20.39	4.16	340	2.7					not sampled
3/10/2009	17.56	4.76	237	3.25					not existing
7/29/2009	23.01	8.23	390	5.57					dry
12/3/2009	20.19	7.36	544	2.53					no data
5/20/2010	19.61	8.9	182	1.37					
10/6/2010	23.16	9.36	255	1.73					
12/7/2011	16.2	6.18						0.135	
1/11/2012	15.4	6.52						0.165	
9/13/2012		5.78						0.162	
6/12/2013	24.3	4.32						0.9	
8/28/2013	25.4	4.44						0.1529	
12/3/2013	22.63	4.33	44.9					0.214	
7/24/2014	22.24	4.48	115.3	1.91				0.175	
11/5/2014	22.93	4.77	112.1	2.45				0.234	
2/17/2015	15.6	5.13	60.3	5.460				0.178	
9/17/2015	25.11	6.54	-148.9	0.250				0.205	
2/11/2016	17.00	6.72	137.2	4.00				0.662	
6/21/2016	21.45	6.75	-62.5	3.31				0.205	
2/1/2017									
6/21/17	Intrinsic Parameter Meter Failed								
11/14/2017	23.80	5.70	-2.8	2.11				0.108	
7/26/2018									
11/27/2018	15.45	6.33	169.3	4.01				0.048	

**Well ID RW-2**

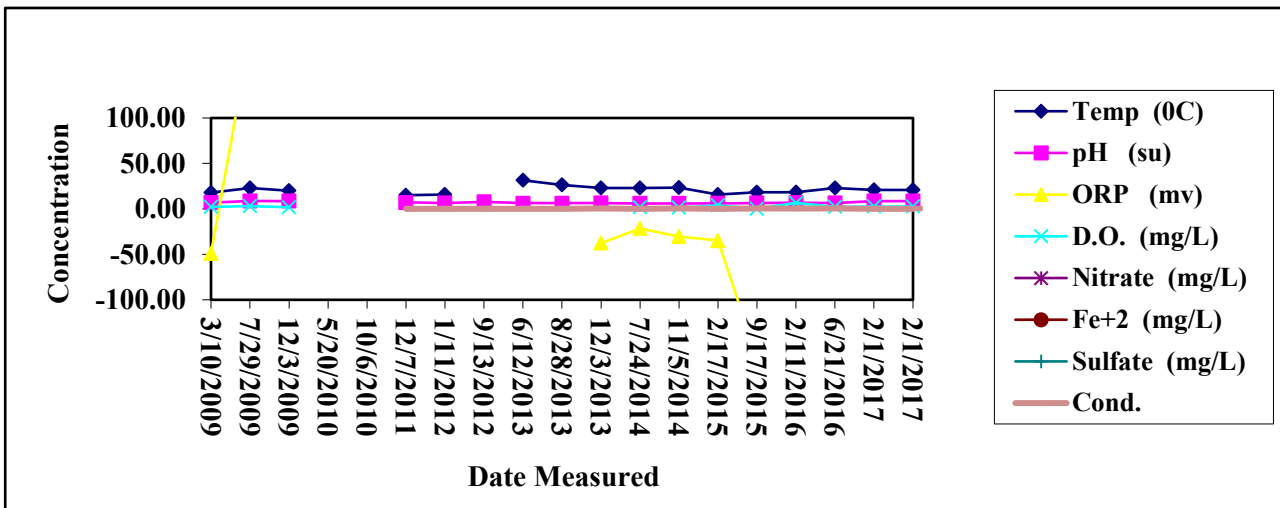


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th)	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

Section 7 - Historical Monitoring Well Intrinsic Groundwater Data										
Well ID RW-3										
Historical Intrinsic Groundwater Data										
Date	Temp (°C)	pH (su)	ORP (mv)	D.O. (mg/L)	Nitrate (mg/L)	Fe <sup>+2</sup> (mg/L)	Sulfate (mg/L)	Cond.		
11/10/2008	initially purged dry									not sampled
3/10/2009	17.87	7	-49	2.07						not sampled
7/29/2009	23.01	8.74	189	3.12						not existing
12/3/2009	20.1	8.71	131	1.87						
5/20/2010										Dry
10/6/2010										no data
12/7/2011	15.1	7.13						0.166		
1/11/2012	15.7	6.37						0.172		
9/13/2012		7.69						0.239		
6/12/2013	31.5	6.23						0.115		
8/28/2013	26.3	6.28						0.24		
12/3/2013	22.88	6.35	-37.6					0.319		
7/24/2014	23.01	5.91	-21.7	1.84				0.244		
11/5/2014	23.28	6.12	-30.6	1.21				0.362		
2/17/2015	15.7	5.97	-35	3.9				0.259		
9/17/2015	18.39	6.55	-163.5	0.26				0.365		
2/11/2016	18.35	6.75	-169.5	6.65				0.403		
6/21/2016	23.08	6.62	-110.90	2.26				0.359		
2/1/2017	20.80	8.520	-131.5	2.55				0.188		
2/1/2017	20.80	8.520	-131.5	2.55				0.188		
6/21/17	Intrinsic Parameter Meter Failed									
11/14/2017	23.71	6.430	-10.8	2.01				0.174		
7/26/2018										
11/27/2018										
3/21/2019	15.88	7.160	95.6	4.49				0.048		

**Well ID RW-3**

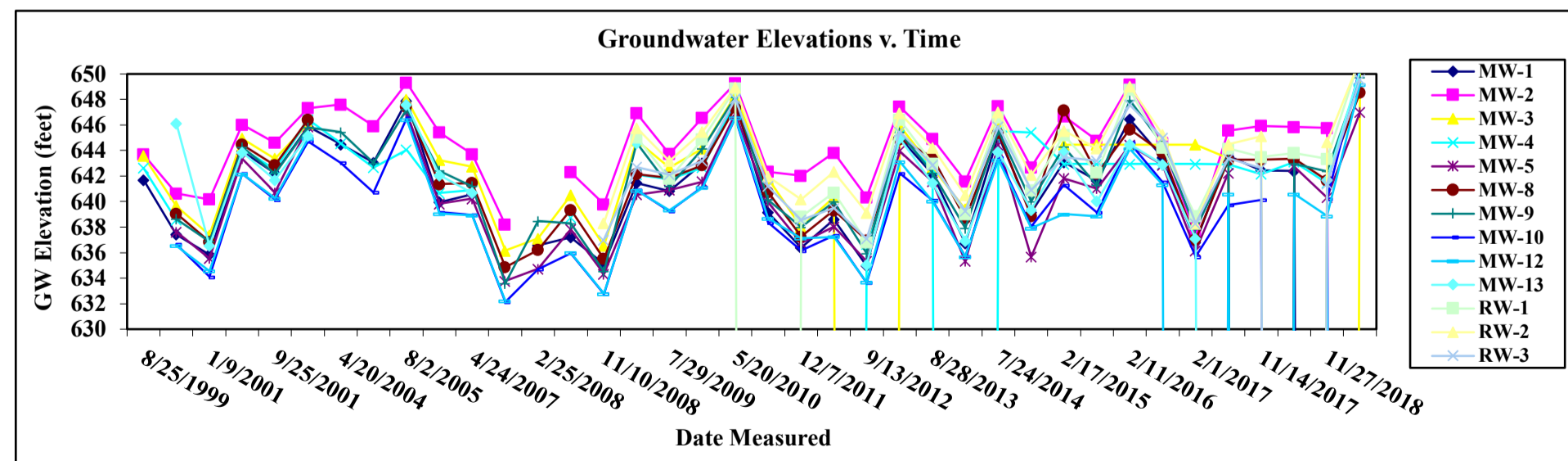


**NATURAL ATTENUATION MONITORING REPORT**

Facility Name:	Doc's Grocery	Year:(7th )	2017
Facility I. D. No.:	13652-015-012698	Sample Frequency:	Triannual
Incident No.:	UST98-02-07	Reporting period:	3 of 3
Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

**Section 8 - Groundwater Elevation Data**  
Well ID/Corrected Groundwater Elevation (feet)

Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-8	MW-9	MW-10	MW-12	MW-13	RW-1	RW-2	RW-3	
8/25/1999	641.7	643.69	643.59	642.63										not sampled
1/13/2000	637.42	640.63	639.65	638.55	637.63	639.06	638.64	636.64	636.53	646.12				missing
1/9/2001	635.84	640.18	637.37		635.55	636.85	636.88	634.10	634.56	636.55				not existing
5/8/2001	643.95	646.02	644.94	644.15	643.37	644.46	644.26	642.20	642.17	643.86				Dry
9/25/2001	642.23	644.61	643.36	642.52	640.70	642.85	642.19	640.16	640.27	641.70				
9/18/2003	645.88	647.33	646.08	646.42	645.86	646.42	645.81	644.73	644.94	645.16				
4/20/2004	644.49	647.60		644.55			645.43	643.03						
6/22/2004	643.06	645.91		642.67			643.01	640.72						
8/2/2005	647.89	649.30	648.00	644.06	646.97	647.46	647.24	646.55	646.43	647.58				
1/23/2007	639.95	645.41	643.25	640.66	639.82	641.36	642.41	639.17	639.05	642.06				
4/24/2007	640.57	643.71	642.75	640.91	640.22	641.46	641.19	638.96	638.93	640.68				
10/31/2007		638.19	636.16		633.77	634.86	633.58	632.13	632.22					
2/25/2008	636.58		637.11		634.73	636.20	638.47	634.70						
6/25/2008	637.21	642.30	640.50	638.75	637.82	639.34	638.28	635.96	635.98					
11/10/2008	635.09	639.78	636.55		634.32	635.51	634.53	632.77	632.78				638.30	637.00
3/10/2009	641.46	646.93	644.80	642.11	640.54	642.16	644.61	640.90	640.86	644.58	645.01	645.77	642.71	
7/29/2009	640.84	643.74	642.65	641.76	640.90	641.86	641.19	639.25	639.32		641.81	643.18	642.12	
12/3/2009	642.99	646.58	644.15	642.66	641.57	642.86	644.14	641.15	641.08		644.86	645.48	643.20	
5/20/2010	647.76	649.28	648.35	647.96	646.89	647.38	648.19	646.55	646.58		648.86	648.96	648.07	
10/6/2010	639.14	642.33	641.80		639.96	640.74	640.14	638.35	638.68		FP	641.98	641.19	
12/7/2011	636.39	642.03	638.00		636.77	637.26	637.99	636.15	637.13		638.81	640.18	638.55	
1/11/2012	638.59	643.83	640.35		638.02	639.31	639.99	637.35	637.23		640.71	642.33	639.50	
9/13/2012	634.96	640.33		636.66	635.32	636.96	635.94	633.65	633.68	635.05	636.81	639.13	637.10	
6/12/2013	645.00	647.43	645.93	645.21	643.96	644.89	645.41	642.21	643.13	644.95	646.41	646.93	645.48	
8/28/2013	642.15	644.93	642.66	642.51	641.57	643.48	642.24	640.09	640.03	641.46	642.98	644.22	642.87	
12/3/2013	636.74	641.58	639.40	DRY	635.32	638.66	637.92	635.70	635.68	636.93	639.01	640.50	639.27	
7/24/2014	645.14	647.48	646.30	645.51	644.43	645.36	645.56	643.45	643.28	643.88	646.60	646.99	645.87	
11/5/2014	639.15	642.68		645.41	635.66	638.86	640.01	638.05	637.92	639.34	640.86	642.08	640.90	
2/17/2015	643.09	646.69	644.46	642.94	641.83	647.16	644.29	641.29	639.01	643.88	645.21	645.54	643.48	
9/17/2015	641.64	644.78	644.46	642.94	641.01	642.20	641.27	639.15	638.85	640.02	642.26	644.18	643.20	
2/11/2016	646.45	649.18	644.46	642.94	644.42	645.66	647.94	644.61	644.13	644.48	648.76	649.03	647.58	
6/21/2016	643.46	644.58	644.46	642.94	642.87	643.84	644.49	641.53	641.33	642.9	644.22	645.26	645.00	
2/1/2017	636.82	637.43	644.46	642.94	636.15	637.01	637.82	635.68	NM	637.08	638.86	638.27	638.29	
6/21/2017	643.57	645.57	643.4	642.9	642.25	643.27	643.34	639.73	640.57	NM	644.16	644.49	643.39	
11/14/2017	642.45	645.93	NM	642.15	NM	643.3	NM	640.14	NM	NM	643.5	645.12	642.64	
7/26/2018	642.39	645.84	NM	643.11	642.73	643.35	642.97	NM	640.6	NM	643.8	NM	NM	
11/27/2018	NM	645.76	NM	641.45	640.31	641.66	642.37	640.22	638.87	641.68	643.34	644.64	641.39	
3/21/2018	NM	NM	650.68	NM	646.99	648.56	649.71	650.48	649.17	650.23	651.23	651.16	649.57	



<b>GROUNDWATER ELEVATION DATA -11/27/2018</b>				
<b>WELL IDENTIFICATION</b>	<b>TOC ELEVATION Feet (NGVD)</b>	<b>Screened Interval Feet NGVD</b>	<b>DTGW (Feet)</b>	<b>GWE (Feet NGVD)</b>
MW-1	654.59	634.87-644.87	NM	NM
MW-2	654.68	635.23-645.23	NM	NM
MW-3	654.8	634.80-644.80	4.12	NM
MW-4	654.96	635.73-645.73	NM	NM
MW-5	654.57	629.57-644.57	7.58	646.99
MW-8	654.76	629.76-644.76	6.20	648.56
MW-9	654.24	629.24-644.24	4.53	649.71
MW-10	654.15	629.15-644.15	3.67	650.48
MW-12	654.13	629.13-644.13	4.96	649.17
MW-13	653.58	628.58-643.58	3.35	650.23
RW-1	655.16	636.16-646.16	3.93	651.23
RW-2	654.88	631.38-646.38	3.72	651.16
RW-3	654.90	634.90-644.90	5.33	649.57



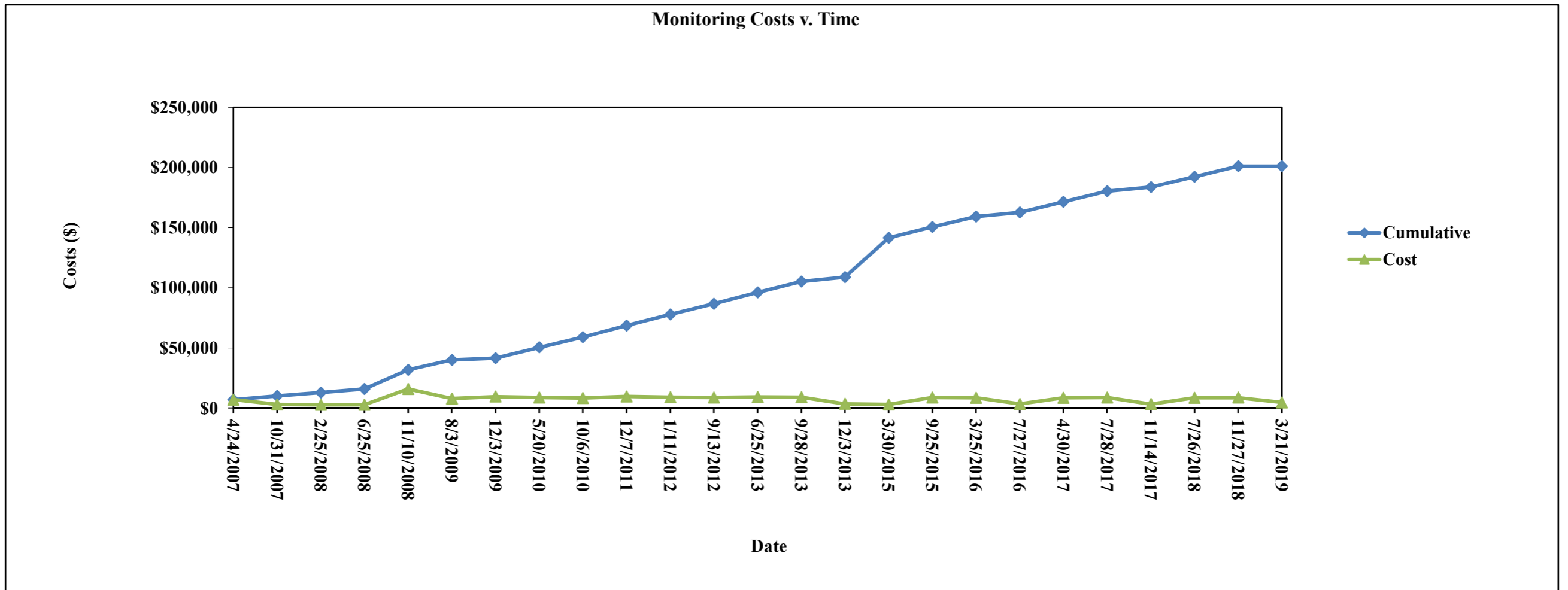
**NATURAL ATTENUATION MONITORING REPORT**

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Consulting Firm:	Poly/Spectrum	Project Manager:	Bob White

**Section 9 - Monitoring Costs v. Time**

Date	4/24/2007	10/31/2007	2/25/2008	6/25/2008	11/10/2008	8/3/2009	12/3/2009	5/20/2010	10/6/2010	12/7/2011	1/11/2012	9/13/2012	6/25/2013
Cost	\$ 7,103.25	\$ 3,089.75	\$ 2,845.50	\$ 2,917.00	\$ 16,014.34	\$8,100.88	\$9,647.51	\$8,886.16	\$8,467.02	9720.20	9187.90	8943.70	9324.50
Cumulative	\$ 7,103.25	\$ 10,193.00	\$ 13,038.50	\$ 15,955.50	\$ 31,969.84	\$40,070.72	\$41,617.35	\$50,503.51	\$58,970.53	\$68,690.73	\$77,878.63	\$86,822.33	\$96,146.83
	9/28/2013	12/3/2013	3/30/2015	9/25/2015	3/25/2016	7/27/2016	4/30/2017	7/28/2017	11/14/2017	7/26/2018	11/27/2018	3/21/2019	
	9103.55	3614.25	3096.25	8943.40	8713.00	3446.25	8,653.78	8962.78	3429.00	8654.2	8802.32	4863.1	
	\$105,250.38	\$108,864.63	\$141,579.10	\$150,522.50	\$ 159,235.50	\$162,681.75	\$171,335.53	\$180,298.31	\$183,727.31	\$192,381.51	\$201,183.83	\$206,046.93	

Please Note: Cumulative costs do not match values on latest PR's for unknown reasons.

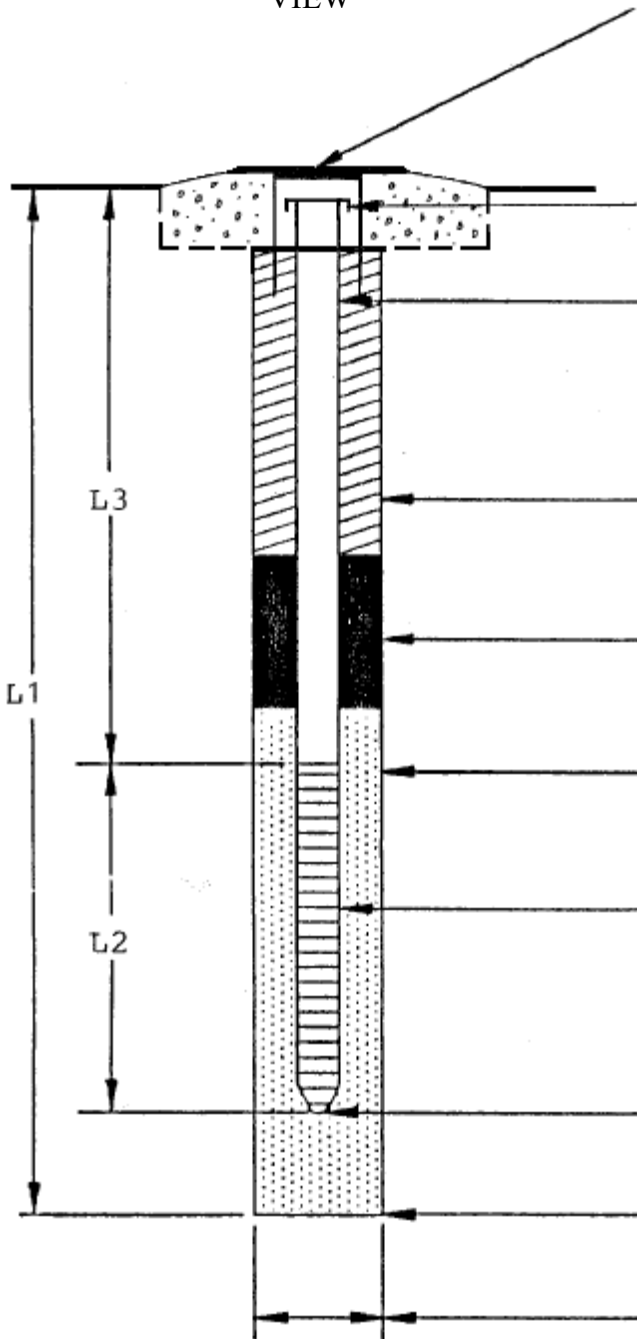


ATTACHMENT 3

WELL CONSTRUCTION SCHEMATIC

## 2- INCH TYPE II AIR SPARGE WELL

### CROSS-SECTIONAL VIEW



FLUSH MOUNT WELL COVER IN CONCRETE PAD	
MANHOLE DIAMETER	8 inches
MANHOLE MATERIAL	Cast Iron/Steel

LOCKABLE VENTED WELL CAP	Yes
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WELL CASING	
MATERIAL	PVC
DIAMETER	2 inch
JOINT TYPE	Threaded
LENGTH	TBD

BACKFILL AROUND CASING	
MATERIAL	Grout
THICKNESS	TBD

SEAL	
TYPE OF SEAL	Bentonite
THICKNESS	2 feet

FILTER PACK	
TYPE OF FILTER	20/40 sand
DISTANCE ABOVE SCREEN	>1'

WELL SCREEN	
SCREEN MATERIAL	PVC
DIAMETER	2 inch
LENGTH	5 feet
SLOT SIZE	0.010 inch

DEPTH TO BOTTOM OF MONITORING WELL	Est. 25 feet
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DEPTH TO BOTTOM OF FILTER SAND	Est. 25 feet
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DIAMETER OF BOREHOLE	6 1/2 inches
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L1	EST	L2	10 feet	L3	TBD
	27 feet				

NO.	DATE	REVISION NOTE	BY

Drawn By: J.C.	Project #: 1081-014-42
Checked By: J.C.	Date: 12/17/2019
Project Mgr: J.C.	File Name: 108101442



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TITLE Docs Grocery Figure 1081-014-42 Proposed Flush Mount, 2-inch Air Sparging/Monitor Well Construction Diagram
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