UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

October 12, 1999

Mr. Mohamed Deria,
Supervising Environmental Analyst
Waste Management Bureau
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, CT 06106

Dear Mr. Deria:

I am writing to formally thank you and the members of your staff who supported me with review of the Environmental Indicator Evaluations (EIEs) for two Dexter Corporation facilities in Windsor Locks, CT.

More specifically, I'd like to thank Sandra Brunelli and Diane Duva for their review of the EIE's that were submitted by Dexter Corporation in August of this year. As a result of the technical support provided by your staff, EPA was able to document that the Dexter Corporation, American Writing Facility (EPA ID No. CTD983895137) has satisfied both the Human Exposures and Groundwater Releases Environmental Indicators (EIs).

As you may be aware, achievement of the EIs is among the highest priorities for the EPA RCRA Corrective Action Program. Therefore, we are truly grateful for the time your staff devoted to this task. It was their knowledge of these sites (Sandra's for the Dexter, Main Plant and Diane's at the American Writing facility) which gave EPA the level of confidence necessary to achieve this task in the timely manner in which it was conducted. I can only hope to work with them again when EPA evaluates the additional investigative work and interim measures that will be necessary to satisfy the EIs at the Dexter, Main Plant; their technical expertise and familiarity with the site data is truly invaluable.

Thank you again.

Sincerely,

Aaron R. Gilbert

Aaron R. Gilbert
RCRA Corrective Action

cc: Sandra Brunelli, CT DEP
Diane Duva, CT DEP
Matthew Hoagland, EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

October 14, 1999

Mr. J. Michael Joyce
Director of Engineering and Regulatory Affairs
Dexter Corporation, Nonwoven Materials
2 Elm Street
Windsor Locks, CT 06096

Re: RCRA Corrective Action
Dexter Corporation, American Writing Facility
EPA ID No. CTD983895137

Dear Mr. Joyce:

The United States Environmental Protection Agency (EPA) is pleased to inform you that EPA has determined that the Dexter Corporation, American Writing facility has achieved the federal goal of Stabilization (watch for the listing of this achievement at EPA's, Office of Solid Waste web site at: http://www.epa.gov/epaoswer/osw/cleanup.htm#achievers).

EPA New England considers Stabilization as the achievement of the two Environmental Indicators (EI), *Current Human Exposures Under Control* and *Migration of Contaminated Groundwater Under Control*. These EI's were originally set forth in a July 29, 1994 memorandum by then Director of EPA's Office of Solid Waste, Michael Shapiro. This memorandum has been the subject of recent amendments; the most current amendment to the EI's is set forth in a February 5, 1999 Interim Final memorandum under Acting Director of EPA's Office of Solid Waste, Elizabeth Cotsworth.

Stabilization is an interim goal meaning that the environmental conditions at a given site/facility do not pose a current risk to human health. You should be aware, therefore, that any change in facility operations or land use which results in a human health exposure scenario would affect this determination.

Also, because Stabilization is an interim goal, facilities that achieve the goal of Stabilization should be aware that they will be expected to achieve the goal of a final remedy at some point in the future. Environmental actions intended for the purpose of achieving Stabilization should therefore be consistent with any anticipated final remedy. Facilities should be particularly

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careful when considering construction activities which could ultimately impact the ability to achieve a final remedy.

Thank you for your continuing commitment to environmental excellence. If you have any questions, please do not hesitate to contact me at (617) 918-1238.

Sincerely,

Aaron R. Gilbert

Aaron R. Gilbert
RCRA Corrective Action Section

cc: S. Brunelli, CT DEP
D. Duva, CT DEP

File: Dexter Corp.
- Windsor Locks
- Reg

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA 725)

RECEIVED
AUG 02 1999
DEP WASTE MANAGEMENT BUREAU
WASTE ENGINEERING & ENFORCEMENT

Current Human Exposures Under Control

Facility Name: *American Writing Paper Company –Dexter Nonwovens Division*
Facility Address: *Canal Bank, Windsor Locks, CT.*
Facility EPA ID #: ~~CTD983871914~~
CTD983895137 -DWD

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC), been **considered** in this EI determination?

√ If yes – check here and continue with #2

——— If no - re-evaluate existing data, or

——— If data are not available, skip to #6 and enter "IN" (more information needed) status code

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("Ye" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land-and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, (GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"** [1] above appropriately protective risk-based "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, Rus or AOCs)?

	Yes	No	?	Rationale/ Key Contaminants
Groundwater		√		See CA 750 Migration of Groundwater Under Control
Air (indoors) [2]		√		No buildings/structures – open space
Surface Soil (e.g.,<2ft)		√		Soil sample results below background/criteria
Surface Water		√		No samples
Sediment		√		No samples
Subsurf. Soil (e.g.,>2ft)	√			Lead, tetrachloroethylene
Air (outdoors)		√		Soil gas survey results were non-detect (see Results of Site Characterization Program 1994)

——— If no (for all media) - skip to #6 and enter "Ye," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

√ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

——— If unknown - (for any medium) - skip to #6 and enter "IN" status code.

Rationale and Reference (s):

No constituents subject to RCRA were detected above the appropriate protective risk-based levels in groundwater or soil vapor (air) samples. No surface water or sediment samples were collected in this area since there have been no active discharges to surface water or sediment in over 60 years and based on the groundwater sample results there is no indication of a release to that medium. The only constituents in soil samples collected that could potentially pose an unacceptable risk were lead and tetrachloroethylene detected above the Media Closure Criteria (MCC) in soils > 2ft. below surface grade. The lead and tetrachloroethylene "contaminated" area is slated for a RCRA Cap (see Results of Site Characterization Program. Proposed Closure Approach and Closure Plan: American Writing C. Area . April 1996), Dexter is awaiting review by CTDEP/USEPA. Attached are summary data tables of the soil sample results.

Footnotes:
[1] "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).
[2] Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

Rationale and Reference (s) (continued):

Note that figure and table numbers are those assigned in the original reference document and have not been revised for this document.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table.

Potential **Human Receptors** (Under Current Conditions)

"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food [3]
Soil (subsurface, e.g.,>2ft)	*No*	*no*	*no*	*no*	*no*	*no*	*No*

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces which are not "contaminated" as identified in #2 above.
2. Enter "yes" or "no" for potential "completeness" under each "Contaminated" Media—Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces (" NA "). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

√ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "Ye" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

_____ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown - (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale and Reference (s):
Groundwater, air (outdoor and indoor), surface water, sediment and soil <2ft are not "contaminated" media based on concentrations and therefore do not require evaluation for "pathway completeness."
For Residents and Day Care, there are no complete pathways to these receptors because it is a commercial/industrial site with security fencing and no residents or day care in the surrounding areas. For Workers, Dexter employees do periodic RCRA inspections to verify the integrity of the security fencing but there is no complete pathway for exposure to the subsurface soils "contaminated" which are greater than 2 feet below the surface. The inspections are reconnaissance in nature therefore do not include any disturbance of the subsurface and are performed based on the presence of a RCRA unit (RU17) located at the site. There is presently no Construction work being performed.

Footnote:
[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

Rationale and Reference (s) (continued):

consequently so pathway exists. However, any future construction activities associated with the RCRA unit cap would pose a potential pathway, would be re-evaluated at that time, and would be subject to appropriate construction worker safeguards under 29 CFR 1910.120. For Trespassers, the area is fenced, which limits the potential for access to the site and also potential trespassers would not be reasonably expected to pose a complete pathway to the subsurface soils >2 ft below surface grade. For Recreation, a paved path exists to the west of the area and the Connecticut River lies to the east, both of which are outside of the fenced perimeters. The area is secured with a fence and the "contamination" is >2feet below the surface preventing a complete pathway to this receptor. For Food, there are no agricultural uses for the area and consequently no complete pathways for this receptor. Fish are taken in the Connecticut River but no contaminants are migrating to this resource.

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be "significant"[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If unknown (for any complete pathway)- skip to #6 and enter "IN" status code.

Rationale and Reference (s):

[4] If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA 725)

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

_____ If yes - (all "significant" exposures have been shown to be within aceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Risk Assessment).

_____ If no - (there are current exposures that can be reasonably expected to be "unacceptable") - continue and enter "NO" status code after providing a description of each potentially :unacceptable" exposure.

_____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code.

Rationale and Reference (s):

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI (event code CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

√ YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Current Human Exposures" are "under Control" at the
American Writing Paper Co. – Dexter Nonwovens Division facility,
EPA ID # *CTD983871914*
located at *Canal Bank, Windsor Locks, CT.* under current and reasonably expected condition. This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

_____ NO - "Current Human Exposures" are NOT "Under Control."

_____ IN - More information is needed to make a determination.

Completed by: (signature) Diane W. Duva Aaron Gilbert 9/14/99 Date: August 31, 1999
(print) Diane W. Duva Aaron Gilbert
(title) Environmental Analyst Environmental Engineer, EPA, RCRA Ct

Supervisor: (signature) Mohamed Deria Date: 8-31-99
(print) MOHAMED DERIA
(title) Supv. Env. Analyst
(EPA Region or State) State of CT

Matthew R. Hoagland
Section Chief
Region I 9/15/99

Locations where References may be found:

References are on file @ CTDEP, Hartford, Connecticut and USEPA, Region 1, Boston, Massachusetts.

Contact telephone and e-mail numbers:
(name)
(phone #)
(e-mail)

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

TABLE 4-11
DEXTER RFA
SUMMARY OF RCRA SITE CHARACTERIZATION DATA
AREA 17 SOIL SAMPLES

Boring ID:	USEPA	17-1				17-2		17-3		17-4		17-5		
Depth (feet):	TCRL	0-2	2-4	8-10	14-16	0-2	4-6	0-2	6-8	0-2	2-4	0-2	4-6	8-10
VOCs (µg/kg)														
Carbon Disulfide	NA			11			14	3.7					36	53
1,1 - Dichloroethane	NA	86	13	50				7.4				16		
Ethylbenzene	NA							9.1					250	
Methylene Chloride	NA	210B	270B	410B	220B	180B	260B	280B	150B	64B	190B	270B	250B	280B
Tetrachloroethene	NA	36		20	16	17	13	6.5		5.1		32		
Toluene	NA							3.4				28		
1,1,1 - Trichloroethane	NA	21		16										
Xylene	NA	20	27	46	39	50	73	42		4.7	46	13	15	42
Semi-volatiles (mg/kg)														
Anthracene	NA		0.3											
Benzo (a) anthracene	NA	0.5	0.6	0.4	0.6		0.3	0.6					0.4	
Benzo (b) fluoranthane	NA	0.7	0.7	0.5	0.7		0.4	1.0		0.4			0.6	
Benzo (k) fluoranthene	NA	0.6	0.7	0.4	0.7		0.4	0.9		0.4			0.5	
Benzo (ghi) perylene	NA				0.4			0.5						
Benzo (a) pyrene	NA	0.6	0.7	0.5	0.7		0.4	1.1					0.5	
Chrysene	NA	0.5	0.6	0.4	0.6		0.4	0.7		0.4			0.5	
Fluoranthene	NA	1.3	1.6	0.9	1.4		0.8	1.3		0.7	0.6	0.6	1.2	0.4
Indeno (1,2,3 - cd) pyrene	NA				0.4			0.6						
Phenanthrene	NA	0.8	1.5	0.5	1.0		0.6	0.9			0.4	0.4	1.1	
Pyrene	NA	1.1	1.2	0.7	1.1		0.7	1.2		0.8	0.5	0.5	1.0	0.4
TPH (mg/kg)	NA	222	232	74	106	36	60	98	184	90	106	36	284	184
Metals (mg/kg)														
Arsenic	NA	49.6	46.2	52.1	57.3	55.1	44.2	51.9	34.7	52.4	41.7	58.5	48.0	50.8
Barium	NA	114	71.9	70.6	72.3	77.9	83.2	117	49.6	58.8	60.7	76.8	92.7	80.5
Cadmium	NA	1.0	0.71	1.2	0.71	0.72	0.71	0.57		0.69	0.72	0.74	0.59	0.45
Chromium	NA	24.3	24.2	22.8	23.8	23.2	20.4	26.0	17.4	18.3	62.6	23.6	34.7	31.8
Lead	NA	78.2	92.5	105	80.7	70.7	99.2	142	50.0	53.0	164	66.0	136	101
Mercury	NA						0.43				1.3			
Selenium	NA	35.0	27.8	33.3	28.8	28.1	24.1	24.4	17.9	26.3	24.3	34.1	26.5	23.5
Silver	NA	1.7	1.5	1.0	1.3	1.9	2.0	1.5	1.5	2.2	2.0	1.4	1.4	1.4
Reactive Sulfide (mg/kg)	500	8.0				8.0	6.0	20	4.0	16.0	16.0	4.0	20	16.0
TCLP VOCs (µg/l)														
1,1 - Dichloroethane	NC	7.2		na										
Methylene Chloride	NC	9.6B	11B	na	11B	8.2B	9.2B	6.0B	6.7B	5.8B	9.1B	13B	5.0B	27B
Tetrachloroethene	700	4.9		na						4.7	2.2			
Toluene	NC			na		3.9				9.2	2.0		9.9	
1,1,1 - Trichloroethane	NC	3.7		na										
TCLP Metals (mg/l)														
Arsenic	5	0.009	0.006	0.009	0.011	0.004	0.009	0.006	0.012	0.009	0.010	0.006	0.009	0.008
Barium	100	0.67	0.36	0.77	0.53	0.46	0.52	0.59	0.44	0.45	0.64	0.47	0.39	0.56
Lead	5	0.07	0.09	0.15	0.06		0.26				0.49	0.09	0.51	0.17

B Constituent also detected in blank samples. na Not analyzed NA Not applicable NC No criterion
TCRL Toxicity characteristic regulatory level from 40 CFR Part 261
Notes:
Blank spaces indicate that the parameters were not detected.
Target analytes not listed were analyzed for but not detected in any sample.

TABLE 4-11 (Continued)
SUMMARY OF RCRA SITE CHARACTERIZATION DATA
AREA 17 SOIL SAMPLES
DEXTER RFA

Boring ID:	USEPA	17-6			17-7			17-8	17-9	17-10	
Depth (feet):	TCRL	0-2	2-4	6-8	0-2	2-4	8-10	0-2	0-2	0-2	4-6
VOCs (µg/kg)											
Carbon Disulfide	NA	25			12						
1,1 - Dichloroethane	NA				19	51					
Ethylbenzene	NA				13						
Methylene Chloride	NA	320B	29B	200B	270B	260B	200B	690B	200B	220B	170B
Tetrachloroethene	NA	48	33		24	24		110	100		
Toluene	NA	38									
1,1,1 - Trichloroethane	NA							100	200		
Trichloroethene	NA		5.0								
Xylene	NA	110	3.5		75			220		30	59
Semi-volatiles (mg/kg)											
Anthracene	NA	0.3						0.8		0.4	
Benzo (a) anthracene	NA	0.4						0.5		1.0	
Benzo (b) fluoranthane	NA	0.5						0.6	0.3	1.2	
Benzo (k) fluoranthene	NA	0.5						0.6	0.4	1.0	
Benzo (ghi) perylene	NA									0.6	
Benzo (a) pyrene	NA	0.5						0.6	0.4	1.2	
Bis (2-ethylhexyl) phthalate	NA									0.9	
Chrysene	NA	0.5						0.5		1.1	
Fluoranthene	NA	1.2		0.7	0.6	0.6	0.6	1.0	0.6	2.2	
Indeno (1,2,3 - cd) pyrene	NA									0.6	
Phenanthrene	NA	1.3		0.5	0.4	0.4	0.4	0.8	0.4	1.7	
Pyrene	NA	1.2	0.3	0.5	0.5	0.5	0.5	1.1	0.5	1.9	
TPH (mg/kg)	NA	28	28	8	66	776	184	74	124	36	4
Metals (mg/kg)											
Arsenic	NA	41.2	39.7	46.5	57.0	60.3	50.3	42.5	50.0	30.5	50.9
Barium	NA	77.0	34.7	58.5	86.4	66.3	74.4	56.8	69.3	47.4	71.3
Cadmium	NA	0.60		0.54		0.77	1.2	0.42	0.49		
Chromium	NA	22.0	16.2	18.9	23.3	26.1	18.8	18.0	21.3	13.5	17.9
Lead	NA	98.7	25.3	322	86.6	79.0	98.0	118	102	42.8	34.0
Mercury	NA										0.61
Selenium	NA	24.1	22.4	21.1	33.8	35.5	41.0	23.4	23.1	19.5	23.0
Silver	NA	1.6	2.2	1.8	2.7	2.5	2.8	1.6	2.5	1.4	2.9
Reactive Sulfide (mg/kg)		4.0	12.0	12.0	16.0	4.0	16.0			12	10
TCLP VOCs (µg/l)											
Methylene Chloride	NC	9.8B	11B	6.8B	9.6B	14B	14B	9.9B	17B	5.0B	7.6B
Tetrachloroethene	700		13		2.5	2.1					
Toluene	NC		8.2								
Trichloroethene	500		3.1								
TCLP Bis (2-ethylhexyl) phthalate (mg/l)	NC					0.03					
TCLP Metals (mg/l)											
Arsenic	5	0.007	0.008	0.007	0.007	0.009	0.008	0.005	0.008	0.007	0.005
Barium	100	0.60	0.41	0.42	0.52	0.48	0.56	0.56	0.87	0.46	0.39
Lead	5			0.17	0.06	0.16	0.22	0.11	0.13		

B Constituent also detected in blank samples. NA Not applicable NC No criterion
TCRL Toxicity characteristic regulatory level from 40 CFR Part 261
Note: Blank spaces indicate that the parameters were not detected.
Target analytes not listed were analyzed for but were not detected in any sample.

TABLE 3-6
Area 17 Data Summary

Parameter	MCC	17-1 (0-2')	17-1 (2-4')	17-1 (8-10')	17-1 (14-16')	17-2 (0-2')	17-2 (4-6')
INORGANICS -							
Total (mg/kg) :							
Arsenic	3.82	***49.6***	***46.2***	***52.1***	***57.3***	***55.1***	***44.2***
Barium	143,080	114	71.9	70.6	72.3	77.9	83.2
Cadmium	1,022	1.0	0.71	1.2	0.71	0.72	0.71
Chromium (Total)	--	24.3	24.2	22.8	23.8	23.2	20.4
Lead	500	78.2	92.5	105	80.7	70.7	99.2
Mercury	613	<0.36	<0.30	<0.35	<0.33	<0.33	0.43
Selenium	10,220	35.0	27.8	33.3	28.8	28.1	24.1
Silver	10,220	1.7	1.5	1.0	1.3	1.9	2.0
Reactive Sulfide	500	8.0	<4.0	<4.0	<4.0	8.0	6.0
TCLP (mg/L) :							
Arsenic	0.050	0.009	0.006	0.009	0.011	0.004	0.009
Barium	1.000	0.67	0.36	0.77	0.53	0.46	0.52
Cadmium	0.005	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Chromium (Total)	--	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
Lead	0.015	***0.07***	***0.09***	***0.15***	***0.06***	<0.05	***0.26***
Mercury	0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002
Selenium	0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Silver	0.050	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
VOCs -							
Total (ug/kg) :							
Carbon Disulfide	204,400,000	<10	<10	11	<10	<10	14
1,1-Dichloroethane	204,400,000	86	13	50	<10	<10	<10

TABLE 3-6
Area 17 Data Summary

Parameter	MCC	17-1 (0-2')	17-1 (2-4')	17-1 (8-10')	17-1 (14-16')	17-2 (0-2')	17-2 (4-6')
Ethylbenzene	204,400,000	<10	<10	<10	<10	<10	<10
Methylene Chloride [1]	763,000	210	270	410	220	180	260
Tetrachloroethylene	110,000	36	<10	20	16	17	13
Toluene	408,800,000	<10	<10	<10	<10	<10	<10
1,1,1-Trichloroethane	183,960,000	<10	<10	21	<10	16	<10
Trichloroethylene	520,000	<10	<10	<10	<10	<10	<10
Xylenes (Total)	1,000,000,000	50	73	20	27	46	39
TCLP (ug/L) :							
1,1-Dichloroethane	1,279	7.2	<2.0	NA	<2.0	<2.0	<2.0
Methylene Chloride [1]	25	9.6	11	NA	11	8.2	9.2
Tetrachloroethylene	5	4.9	<2.0	NA	<2.0	<2.0	<2.0
Toluene	1,000	<2.0	<2.0	NA	<2.0	3.9	<2.0
1,1,1-Trichloroethane	200	3.7	<2.0	NA	<2.0	<2.0	<2.0
Trichloroethylene	5	<2.0	<2.0	NA	<2.0	<2.0	<2.0
SVOCs -							
Total (mg/kg) :							
Anthracene	613,200	<0.3	0.3	<0.3	<0.3	<0.3	<0.3
Benzo(a)anthracene	7.8	0.5	0.6	0.4	0.6	<0.3	0.3
Benzo(b)fluoranthene	7.8	0.7	0.7	0.5	0.7	<0.3	0.4
Benzo(k)fluoranthene	78	0.6	0.7	0.4	0.7	<0.3	0.4
Benzo(g,h,i)perylene	--	<0.3	<0.3	<0.3	0.4	<0.3	<0.3
Benzo(a)pyrene	0.78	0.6	0.7	0.5	0.7	<0.3	0.4
Bis(2-ethylhexyl)phthalate	409	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3
Chrysene	784	0.5	0.6	0.4	0.6	<0.3	0.4

TABLE 3-6
Area 17 Data Summary

Parameter	MCC	17-1 (0-2')	17-1 (2-4')	17-1 (8-10')	17-1 (14-16')	17-2 (0-2')	17-2 (4-6')
Fluoranthene	81,760	1.3	1.6	0.9	1.4	<0.3	0.8
Indeno(1,2,3-c,d)pyrene	7.8	<0.3	<0.3	<0.3	0.4	<0.3	<0.3
Phenanthrene	--	0.8	1.5	0.5	1.0	<0.3	0.6
Pyrene	61,320	1.1	1.2	0.7	1.1	<0.3	0.7
TCLP (mg/L) :							
Bis(2-ethylhexyl)phthalate	0.010	<0.02	<0.02	NA	<0.02	<0.02	<0.02
Total Petroleum Hydrocarbons (mg/kg)	2,500	222	232	74	106	36	60

NOTE : [1] Methylene chloride was detected in the laboratory method blank associated with these samples.

BDL = Below Detection Limits
NA = Not Analyzed
-- : Indicates that a MCC has not been established.

TABLE 3-6 (Cont'd)
Area 17 Data Summary

Parameter	MCC	17-3 (0-2')	17-3 (6-8')	17-4 (0-2')	17-4 (2-4')	17-5 (0-2')	17-5 (4-6')
INORGANICS -							
Total (mg/kg) :							
Arsenic	3.82	***51.9***	***34.7***	***52.4***	***41.7***	***58.5***	***48.0***
Barium	143,080	117	49.6	58.8	60.7	76.8	92.7
Cadmium	1,022	0.57	<0.39	0.69	0.72	0.74	0.59
Chromium (Total)	--	26.0	17.4	18.3	62.6	23.6	34.7
Lead	500	142	50.0	53.0	164	66.0	136
Mercury	613	<0.34	<0.33	<0.30	1.3	<0.33	<0.28
Selenium	10,220	24.4	17.9	26.3	24.3	34.1	26.5
Silver	10,220	1.5	1.5	2.2	2.0	1.4	1.4
Reactive Sulfide	500	20	4.0	16.0	16.0	4.0	20
TCLP (mg/L) :							
Arsenic	0.050	0.006	0.012	0.009	0.010	0.006	0.009
Barium	1.000	0.59	0.44	0.45	0.64	0.47	0.39
Cadmium	0.005	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Chromium (Total)	--	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
Lead	0.015	<0.05	<0.05	<0.05	***0.49***	***0.09***	***0.51***
Mercury	0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002
Selenium	0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Silver	0.050	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
VOCs -							
Total (ug/kg) :							
Carbon Disulfide	204,400,000	3.7	<10	<2.0	<20	<10	36
1,1-Dichloroethane	204,400,000	7.4	<10	<2.0	<20	16	<10

TABLE 3-6 (Cont'd)
Area 17 Data Summary

Parameter	MCC	17-3 (0-2')	17-3 (6-8')	17-4 (0-2')	17-4 (2-4')	17-5 (0-2')	17-5 (4-6')
Ethylbenzene	204,400,000	9.1	<10	<2.0	<20	<10	<10
Methylene Chloride [1]	763,000	230	150	64	190	270	250
Tetrachloroethylene	110,000	6.5	<10	5.1	<20	32	<10
Toluene	408,800,000	3.4	<10	<2.0	<20	28	<10
1,1,1-Trichloroethane	183,960,000	<2.0	<10	<2.0	<20	<10	<10
Trichloroethylene	520,000	<2.0	<10	<2.0	<20	<10	<10
Xylenes (Total)	1,000,000,000	42	<10	4.7	46	13	15
TCLP (ug/L) :							
1,1-Dichloroethane	1,279	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Methylene Chloride [1]	25	6.0	6.7	5.8	9.1	13	5.0
Tetrachloroethylene	5	<2.0	<2.0	4.7	2.2	<2.0	<2.0
Toluene	1,000	<2.0	<2.0	9.2	2.0	<2.0	9.9
1,1,1-Trichloroethane	200	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichloroethylene	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
SVOCs -							
Total (mg/kg) :							
Anthracene	613,200	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3
Benzo(a)anthracene	7.8	0.6	<0.3	<0.3	<0.3	<0.3	0.4
Benzo(b)fluoranthene	7.8	1.0	<0.3	0.4	<0.3	<0.3	0.6
Benzo(k)fluoranthene	78	0.9	<0.3	0.4	<0.3	<0.3	0.5
Benzo(g,h,i)perylene	--	0.5	<0.3	<0.3	<0.3	<0.3	<0.3
Benzo(a)pyrene	0.78	*1.1*	<0.3	<0.3	<0.3	<0.3	0.5
Bis(2-ethylhexyl)phthalate	409	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3
Chrysene	784	0.7	<0.3	0.4	<0.3	<0.3	0.5

TABLE 3-6 (Cont'd)
Area 17 Data Summary

Parameter	MCC	17-3 (0-2')	17-3 (6-8')	17-4 (0-2')	17-4 (2-4')	17-5 (0-2')	17-5 (4-6')
Fluoranthene	81,760	1.3	<0.3	0.7	0.6	0.6	1.2
Indeno(1,2,3-c,d)pyrene	7.8	0.6	<0.3	<0.3	<0.3	<0.3	<0.3
Phenanthrene	--	0.9	<0.3	<0.3	0.4	0.4	1.1
Pyrene	61,320	1.2	<0.3	0.8	0.5	0.5	1.0
TCLP (mg/L) :							
Bis(2-ethylhexyl)phthalate	0.010	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
Total Petroleum Hydrocarbons (mg/kg)	2,500	98	184	90	106	36	284

NOTE : [1] Methylene chloride was detected in the laboratory method blank associated with these samples.

BDL = Below Detection Limits
NA = Not Analyzed
-- : Indicates that a MCC has not been established.

TABLE 3-6 (Cont'd)
Area 17 Data Summary

Parameter	MCC	17-5 (8-10')	17-6 (0-2')	17-6 (2-4')	17-6 (6-8')	17-7 (0-2')	17-7 (2-4')
INORGANICS -							
Total (mg/kg) :							
Arsenic	3.82	***50.8***	***41.2***	***39.7***	***46.5***	***57.0***	***60.3***
Barium	143,080	80.5	77.0	34.7	58.5	86.4	66.3
Cadmium	1,022	0.45	0.60	<0.40	0.54	<0.55	0.77
Chromium (Total)	--	31.8	22.0	16.2	18.9	23.3	26.1
Lead	500	101	98.7	25.3	322	86.6	79.0
Mercury	613	<0.37	<0.34	<0.33	<0.25	<0.35	<0.28
Selenium	10,220	23.5	24.1	22.4	21.1	33.8	35.5
Silver	10,220	1.4	1.6	2.2	1.8	2.7	2.5
Reactive Sulfide	500	16.0	4.0	12.0	12.0	16.0	4.0
TCLP (mg/L) :							
Arsenic	0.050	0.008	0.007	0.008	0.007	0.007	0.009
Barium	1.000	0.56	0.60	0.41	0.42	0.52	0.48
Cadmium	0.005	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Chromium (Total)	--	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
Lead	0.015	***0.17***	<0.05	<0.05	***0.17***	***0.06***	***0.16***
Mercury	0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002
Selenium	0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Silver	0.050	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
VOCs -							
Total (ug/kg) :							
Carbon Disulfide	204,400,000	53	25	<2.0	<20	12	<20
1,1-Dichloroethane	204,400,000	<10	<20	<2.0	<20	19	51

TABLE 3-6 (Cont'd)
Area 17 Data Summary

Parameter	MCC	17-5 (8-10')	17-6 (0-2')	17-6 (2-4')	17-6 (6-8')	17-7 (0-2')	17-7 (2-4')
Ethylbenzene	204,400,000	<10	<20	<2.0	<20	13	<20
Methylene Chloride [1]	763,000	280	320	29	200	270	260
Tetrachloroethylene	110,000	<10	48	33	<20	24	24
Toluene	408,800,000	<10	38	<2.0	<20	<10	<20
1,1,1-Trichloroethane	183,960,000	<10	<20	<2.0	<20	<10	<20
Trichloroethylene	520,000	<10	<20	5.0	<20	<10	<20
Xylenes (Total)	1,000,000,000	42	110	3.5	<20	75	<20
TCLP (ug/L) :							
1,1-Dichloroethane	1,279	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Methylene Chloride [1]	25	*27*	9.8	11	6.8	9.6	14
Tetrachloroethylene	5	<2.0	<2.0	*13*	<2.0	2.5	2.1
Toluene	1,000	<2.0	<2.0	8.2	<2.0	<2.0	<2.0
1,1,1-Trichloroethane	200	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichloroethylene	5	<2.0	<2.0	3.1	<2.0	<2.0	<2.0
SVOCs -							
Total (mg/kg) :							
Anthracene	613,200	<0.3	0.3	<0.3	<0.3	<0.3	<0.3
Benzo(a)anthracene	7.8	<0.3	0.4	<0.3	<0.3	<0.3	<0.3
Benzo(b)fluoranthene	7.8	<0.3	0.5	<0.3	<0.3	<0.3	<0.3
Benzo(k)fluoranthene	78	<0.3	0.5	<0.3	<0.3	<0.3	<0.3
Benzo(g,h,i)perylene	--	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3
Benzo(a)pyrene	0.78	<0.3	0.5	<0.3	<0.3	<0.3	<0.3
Bis(2-ethylhexyl)phthalate	409	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3
Chrysene	784	<0.3	0.5	<0.3	<0.3	<0.3	<0.3

TABLE 3-6 (Cont'd)
Area 17 Data Summary

Parameter	MCC	17-5 (8-10')	17-6 (0-2')	17-6 (2-4')	17-6 (6-8')	17-7 (0-2')	17-7 (2-4')
Fluoranthene	81,760	0.4	1.2	<0.3	0.5	0.6	0.6
Indeno(1,2,3-c,d)pyrene	7.8	<0.3	<0.3	<0.3	<0.3	<0.3	<0.3
Phenanthrene	--	<0.3	1.3	<0.3	0.5	0.4	0.4
Pyrene	61,320	0.4	1.2	0.3	0.5	0.5	0.5
TCLP (mg/L) :							
Bis(2-ethylhexyl)phthalate	0.010	<0.02	<0.02	<0.02	<0.02	<0.02	***0.03***
Total Petroleum Hydrocarbons (mg/kg)	2,500	184	28	28	8	66	776

NOTE : [1] Methylene chloride was detected in the laboratory method blank associated with these samples.

BDL = Below Detection Limits
NA = Not Analyzed
-- : Indicates that a MCC has not been established.

TABLE 3-6 (Cont'd)
Area 17 Data Summary

Parameter	MCC	17-7 (8-10')	17-8 (0-2')	17-9 (0-2')	17-10 (0-2')	17-10 (4-6')
INORGANICS -						
Total (mg/kg) :						
Arsenic	3.82	***50.3***	***42.5***	***50.0***	***30.5***	***50.9***
Barium	143,080	74.4	56.8	69.3	47.4	71.3
Cadmium	1,022	1.2	0.42	0.49	<0.39	<0.40
Chromium (Total)	--	18.8	18.0	21.3	13.5	17.9
Lead	500	98.0	118	102	42.8	34.0
Mercury	613	<0.37	<0.35	<0.32	<0.31	0.61
Selenium	10,220	41.0	23.4	23.1	19.5	23.0
Silver	10,220	2.8	1.6	2.5	1.4	2.9
Reactive Sulfide	500	16.0	<4.0	<4.0	12.0	10.0
TCLP (mg/L) :						
Arsenic	0.050	0.008	0.005	0.008	0.007	0.005
Barium	1.000	0.56	0.56	0.87	0.46	0.39
Cadmium	0.005	<0.01	<0.01	<0.01	<0.01	<0.01
Chromium (Total)	--	<0.02	<0.02	<0.02	0.05	<0.02
Lead	0.015	***0.22***	***0.11***	***0.13***	<0.05	<0.05
Mercury	0.002	<0.002	<0.002	<0.002	<0.002	<0.002
Selenium	0.010	<0.005	<0.005	<0.005	<0.005	<0.005
Silver	0.050	<0.01	<0.01	<0.01	<0.01	<0.01
VOCs -						
Total (ug/kg) :						
Carbon Disulfide	204,400,000	<100	<500	<100	<20	<20
1,1-Dichloroethane	204,400,000	<100	<100	<100	<20	<20

TABLE 3-6 (Cont'd)
Area 17 Data Summary

Parameter	MCC	17-7 (8-10')	17-8 (0-2')	17-9 (0-2')	17-10 (0-2')	17-10 (4-6')
Ethylbenzene	204,400,000	<100	<100	<100	<20	<20
Methylene Chloride [1]	763,000	200	690	200	220	170
Tetrachloroethylene	110,000	<100	110	100	<20	<20
Toluene	408,800,000	<100	<100	<100	<20	<20
1,1,1-Trichloroethane	183,960,000	<100	100	200	<20	<20
Trichloroethylene	520,000	<100	<100	<100	<20	<20
Xylenes (Total)	1,000,000,000	<100	220	<100	30	59
TCLP (ug/L) :						
1,1-Dichloroethane	1,279	<2.0	<2.0	<2.0	<2.0	<2.0
Methylene Chloride [1]	25	14	9.9	17	5.0	7.6
Tetrachloroethylene	5	<2.0	<2.0	<2.0	<2.0	<2.0
Toluene	1,000	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,1-Trichloroethane	200	<2.0	<2.0	<2.0	<2.0	<2.0
Trichloroethylene	5	<2.0	<2.0	<2.0	<2.0	<2.0
SVOCs -						
Total (mg/kg) :						
Anthracene	613,200	<0.3	0.8	<0.3	0.4	<0.3
Benzo(a)anthracene	7.8	<0.3	0.5	<0.3	1.0	<0.3
Benzo(b)fluoranthene	7.8	<0.3	0.6	0.3	1.2	<0.3
Benzo(k)fluoranthene	78	<0.3	0.6	0.4	1.0	<0.3
Benzo(g,h,i)perylene	--	<0.3	<0.3	<0.3	0.6	<0.3
Benzo(a)pyrene	0.78	<0.3	0.6	0.4	*1.2*	<0.3
Bis(2-ethylhexyl)phthalate	409	<0.3	<0.3	<0.3	0.9	<0.3
Chrysene	784	<0.3	0.5	<0.3	1.1	<0.3

TABLE 3-6 (Cont'd)
Area 17 Data Summary

Parameter	MCC	17-7 (8-10')	17-8 (0-2')	17-9 (0-2')	17-10 (0-2')	17-10 (4-6')
Fluoranthene	81,760	0.6	1.0	0.6	2.2	<0.3
Indeno(1,2,3-c,d)pyrene	7.8	<0.3	<0.3	<0.3	0.6	<0.3
Phenanthrene	--	0.4	0.8	0.4	1.7	<0.3
Pyrene	61,320	0.5	1.1	0.5	1.9	<0.3
TCLP (mg/L) :						
Bis(2-ethylhexyl)phthalate	0.010	<0.02	<0.02	<0.02	<0.02	<0.02
Total Petroleum Hydrocarbons (mg/kg)	2,500	184	74	124	36	4

NOTE : [1] Methylene chloride was detected in the laboratory method blank associated with these samples.

BDL = Below Detection Limits
NA = Not Analyzed
-- : Indicates that a MCC has not been established.

FIGURE 1A
AW-1 - 1994 & 1995 As, Ba & Pb
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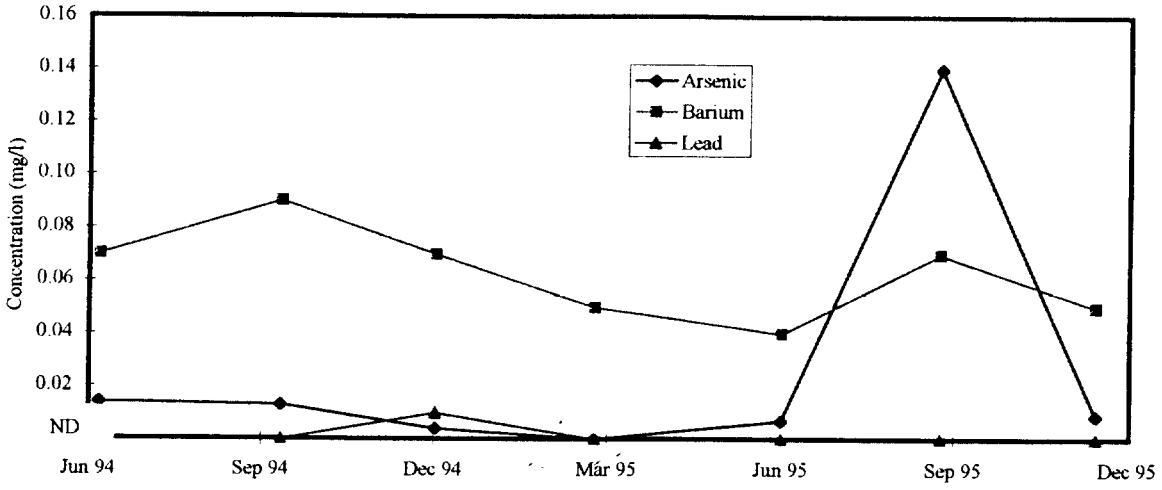

FIGURE 1B
AW-1 - 1994 & 1995 Fe, Mn, Na, Cl, Sulfate & Mean TOC
AMERICAN WRITING PAPER CO. UNIT

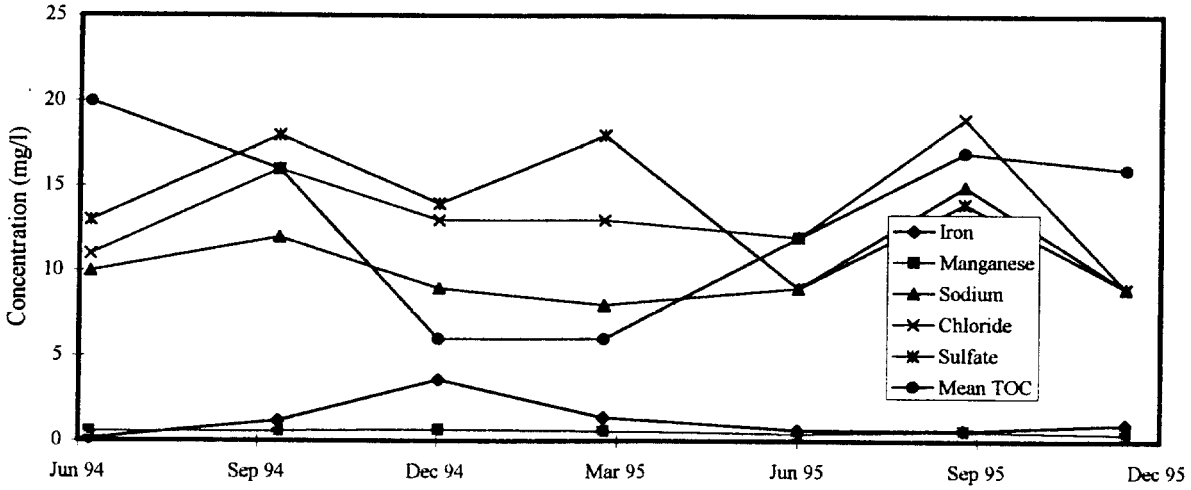

FIGURE 1C
AW-1 - 1994 & 1995 CARBON DISULFIDE
AMERICAN WRITING PAPER CO. UNIT

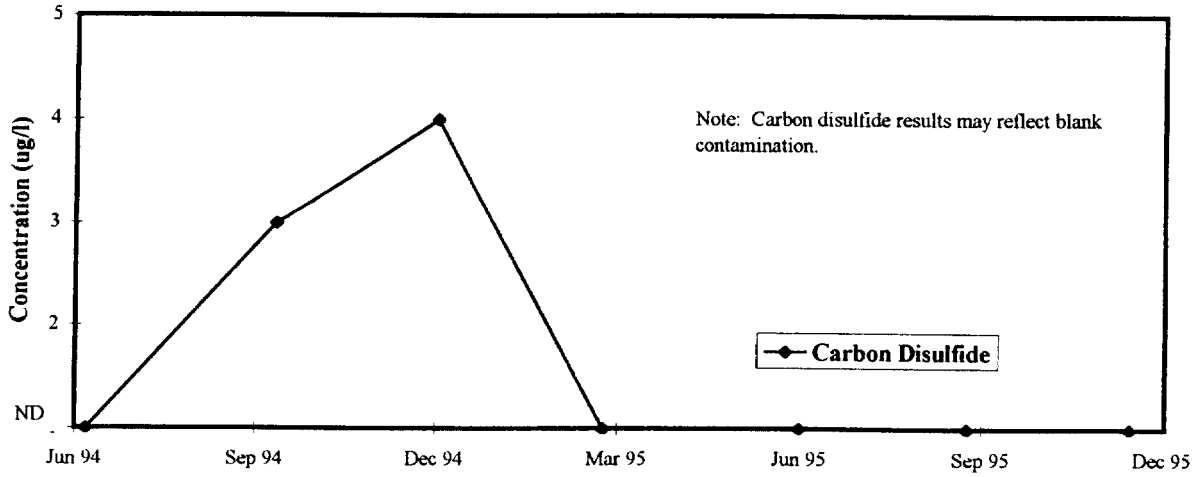

FIGURE 2A
AW-2 - 1994 & 1995 As & Phenols
AMERICAN WRITING PAPER CO. UNIT

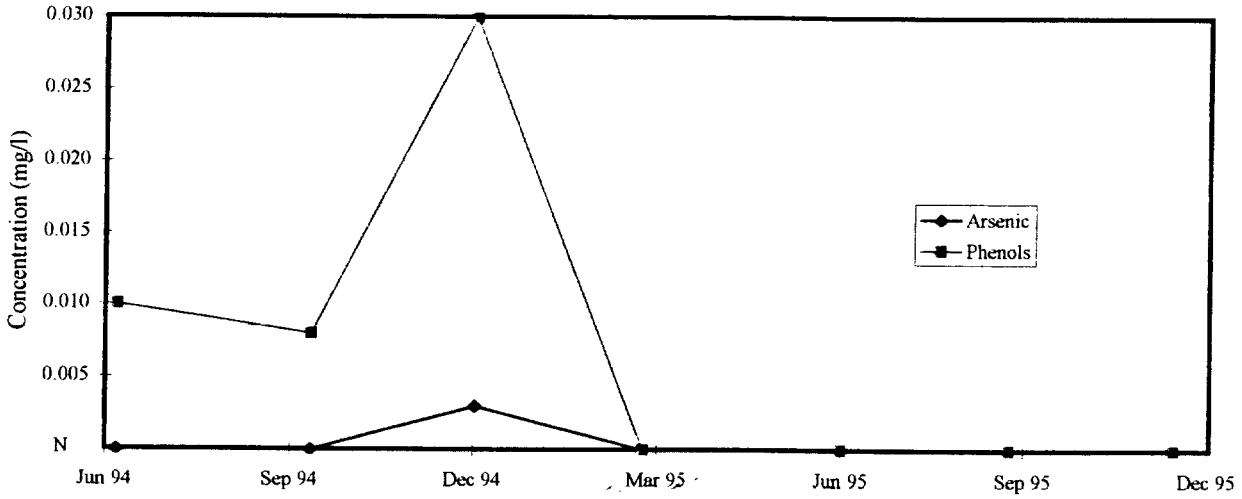

FIGURE 2B
AW-2 - 1994 & 1995 Fe, Na, Cl & SO4
AMERICAN WRITING PAPER CO. UNIT

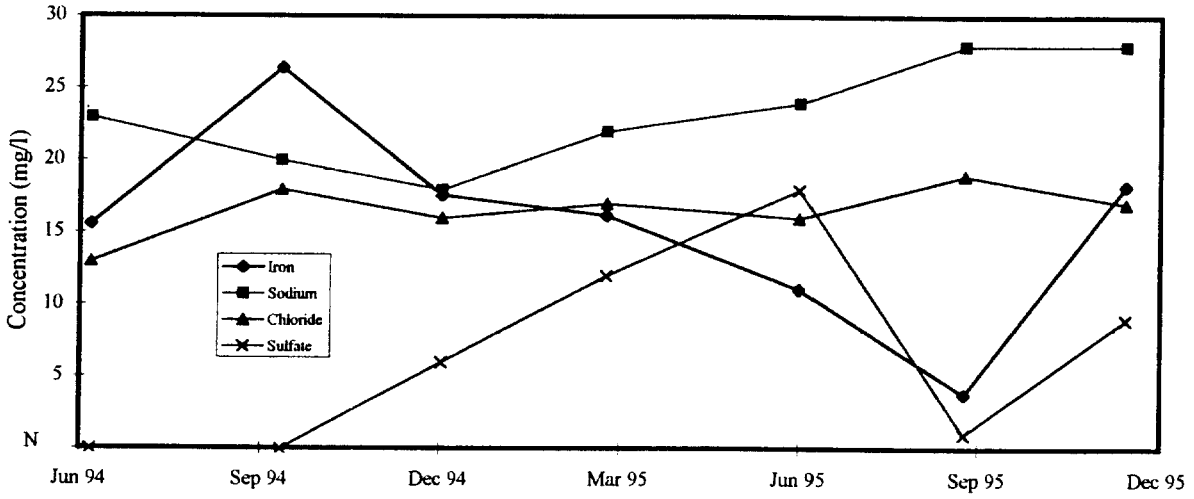

FIGURE 2C
AW-2 - 1994 & 1995 Ba, Mn & TPH
AMERICAN WRITING PAPER CO. UNIT

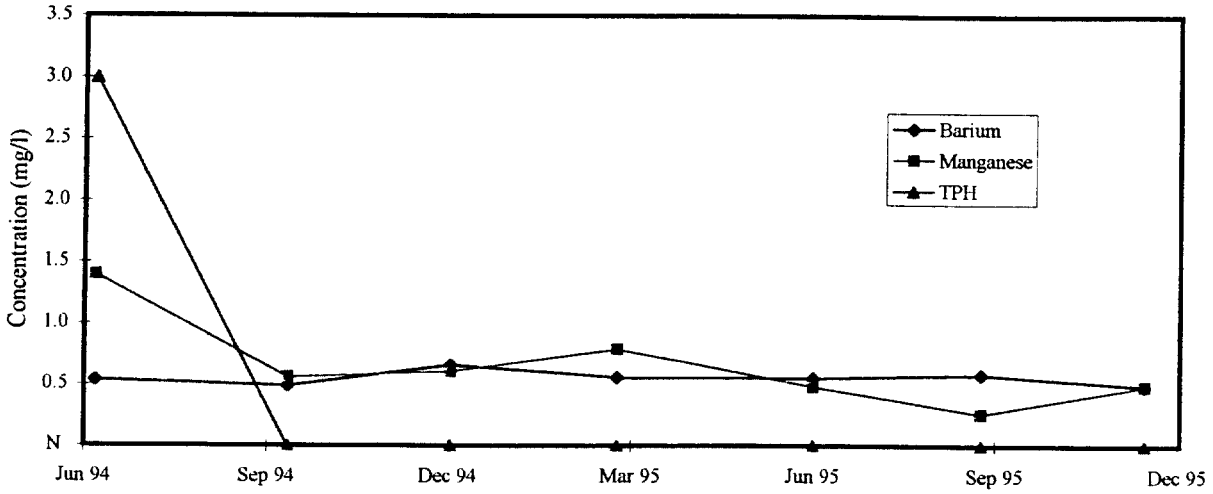

FIGURE 3A
AW-3 - 1994 & 1995 As, Pb & Phenols
AMERICAN WRITING PAPER CO. UNIT

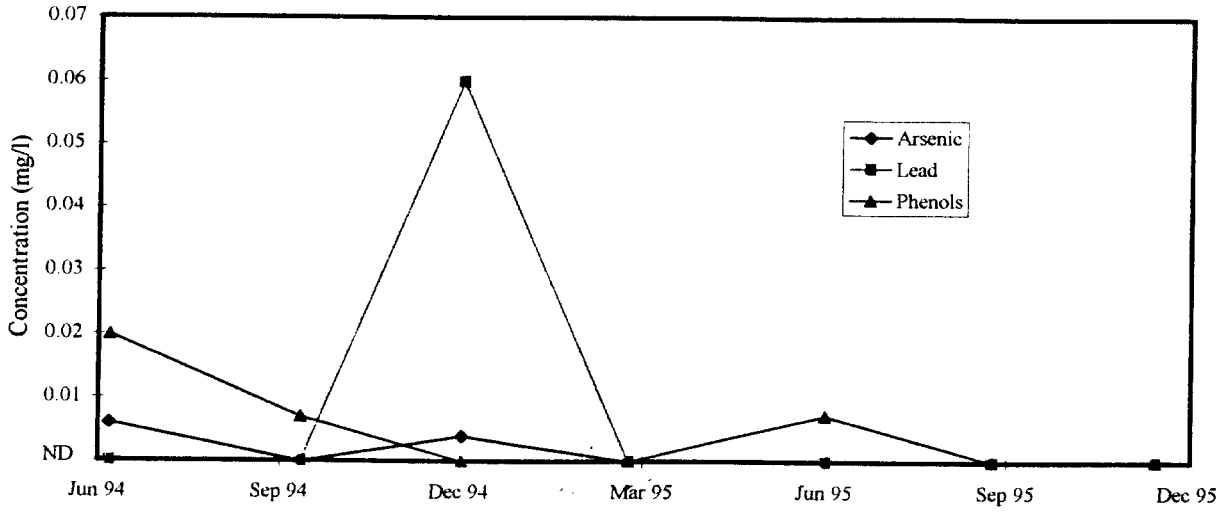

FIGURE 3B
AW-3 - 1994 & 1995 Ba, Fe & Mn
AMERICAN WRITING PAPER CO. UNIT

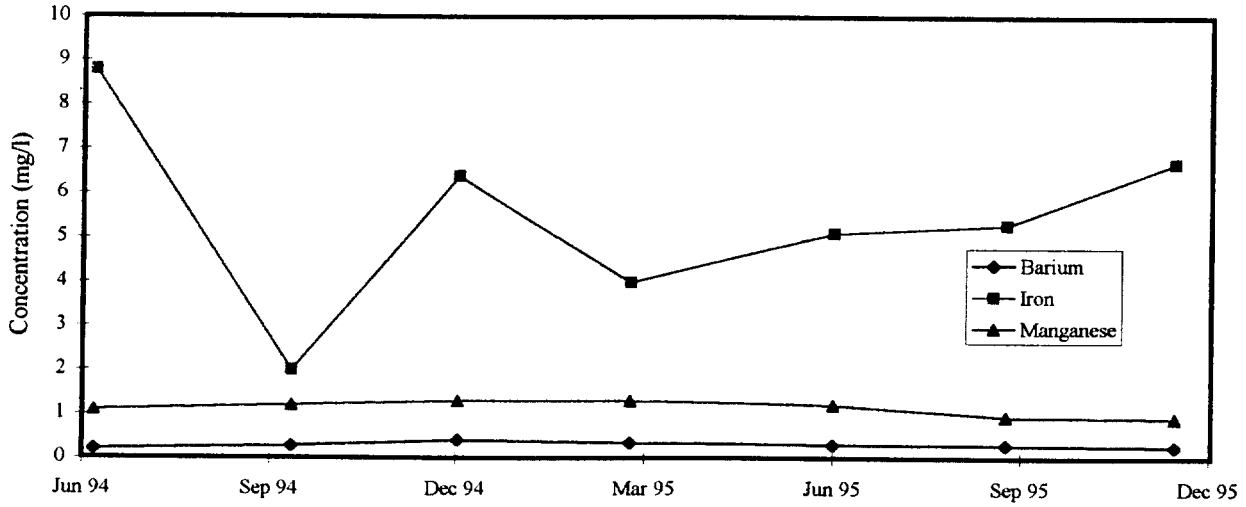

FIGURE 3C
AW-3 - 1994 & 1995 Na, SO4, Cl, and Mean TOC
AMERICAN WRITING PAPER CO. UNIT

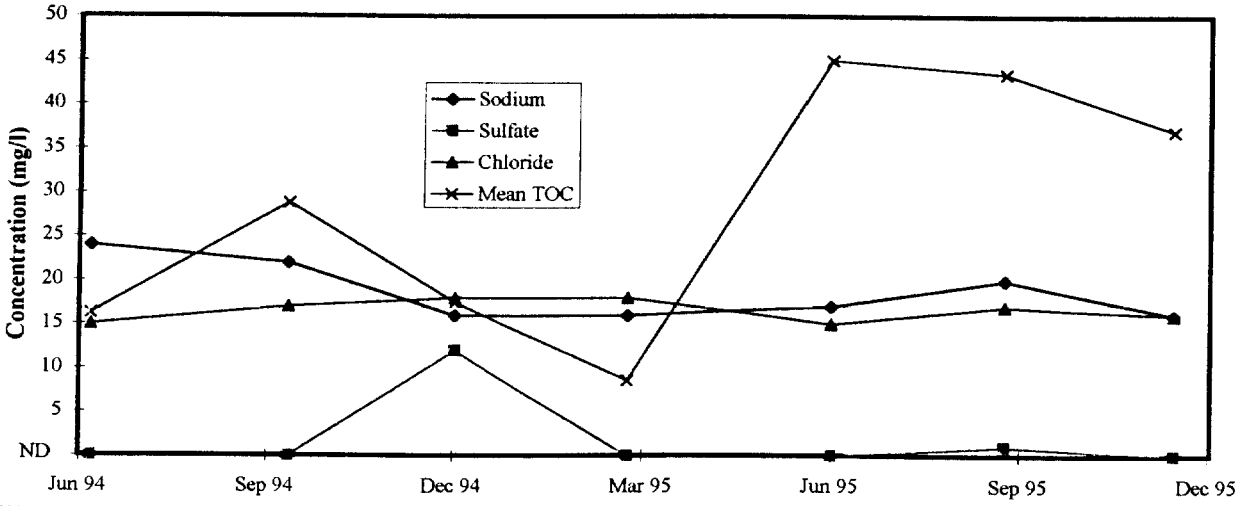

FIGURE 3D
AW-3 - 1994 & 1995 CS2 & ETHYLBENZENE
AMERICAN WRITING PAPER CO. UNIT

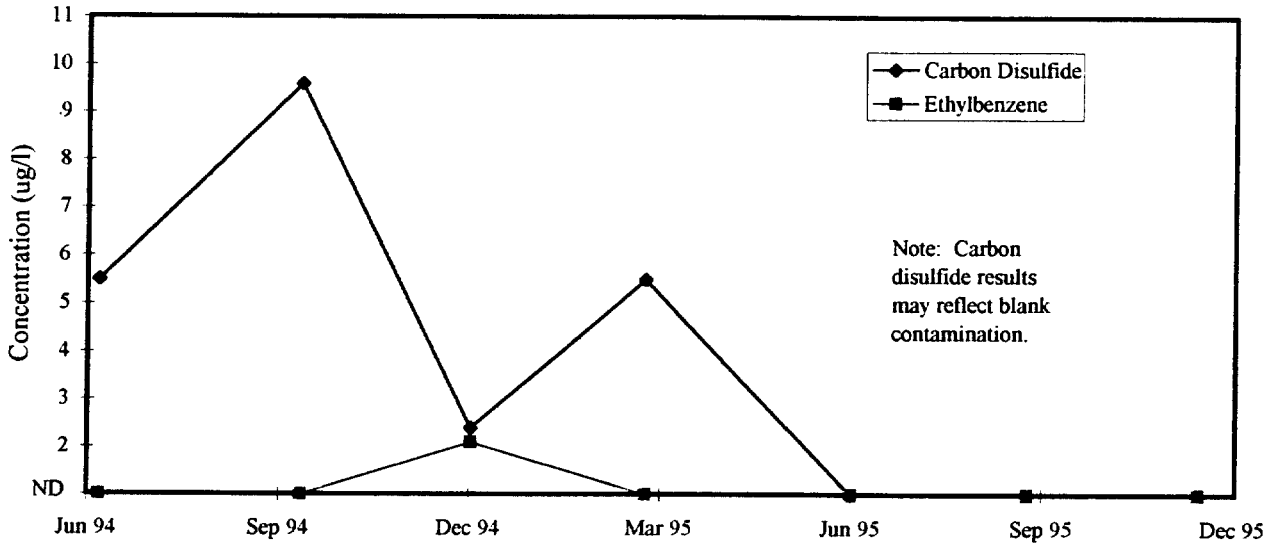

FIGURE 4A
AW-4 - 1994 & 1995 Ba & Mn
AMERICAN WRITING PAPER CO. UNIT

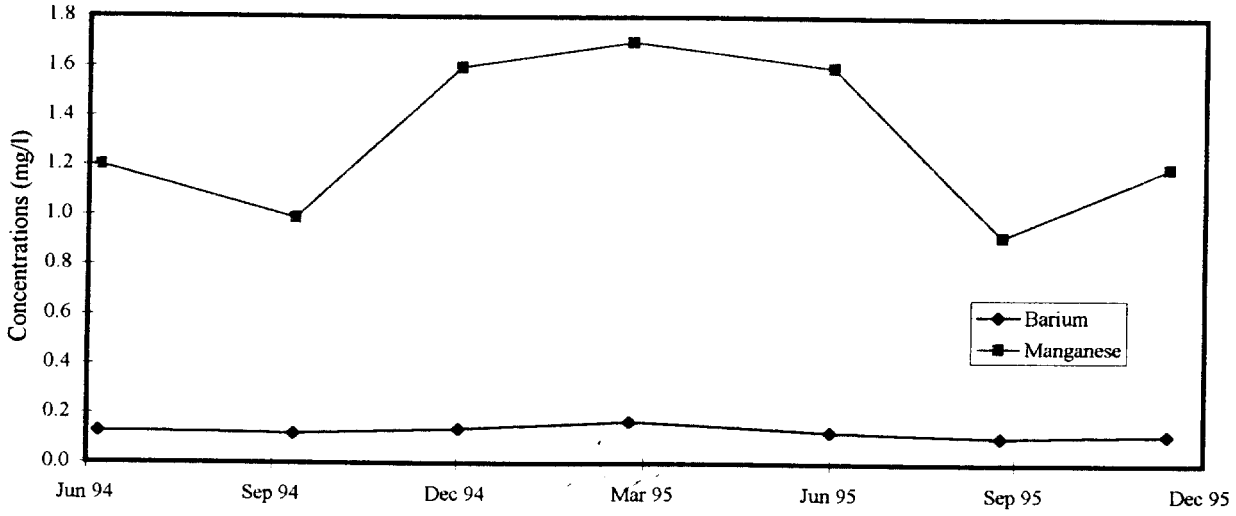

FIGURE 4B
AW-4 - 1994 & 1995 Cl, Fe, Na, SO4, & Mean TOC
AMERICAN WRITING PAPER CO. UNIT

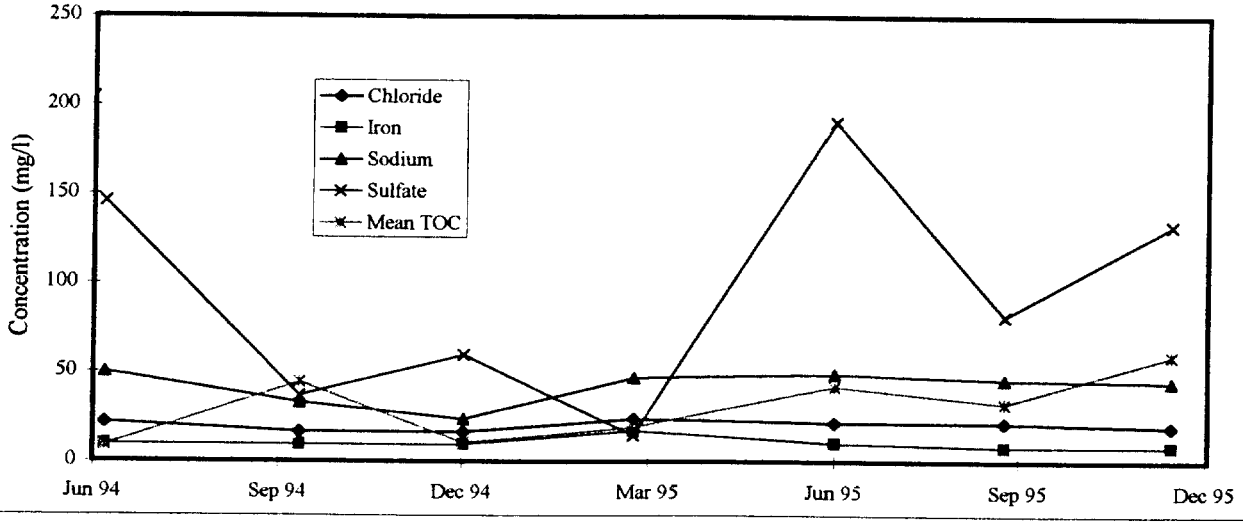

FIGURE 4C
AW-4 - 1994 & 1995 As, Pb, & Phenols
AMERICAN WRITING PAPER CO. UNIT

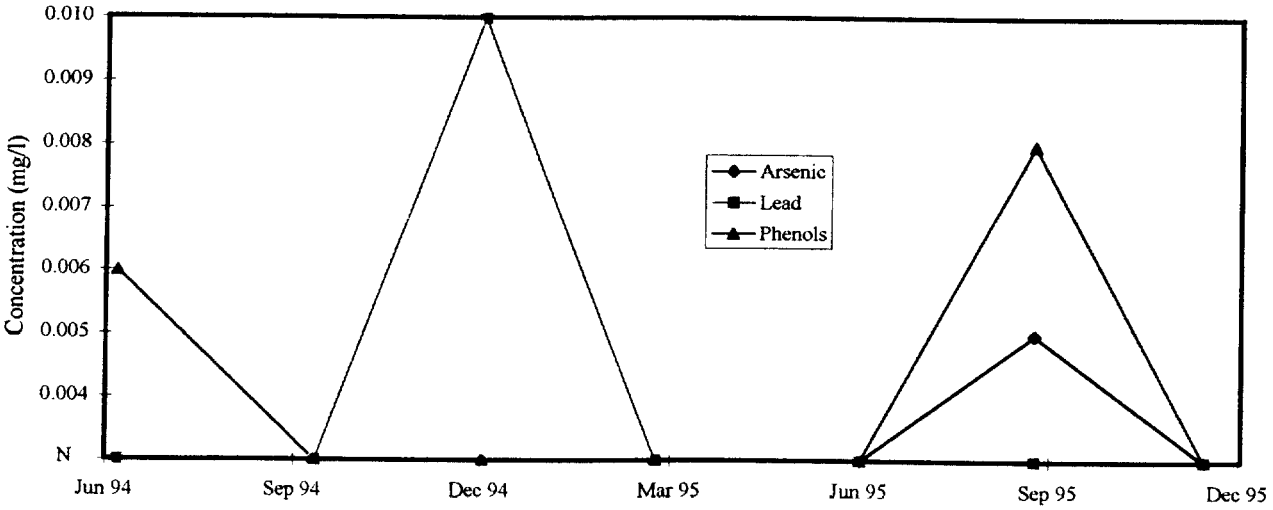

FIGURE 4D
AW-4 - 1994 & 1995 1,1-DICHLOROETHANE
AMERICAN WRITING PAPER CO. UNIT

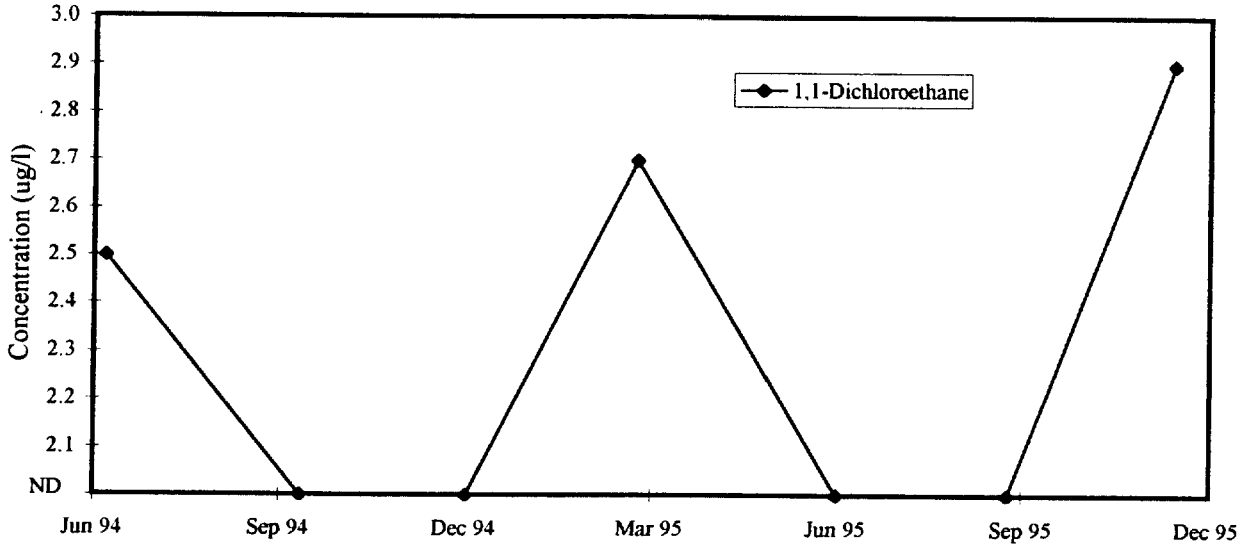

FIGURE 5A
AW-5 - 1994 & 1995 Ba & Phenols
AMERICAN WRITING PAPER CO. UNIT

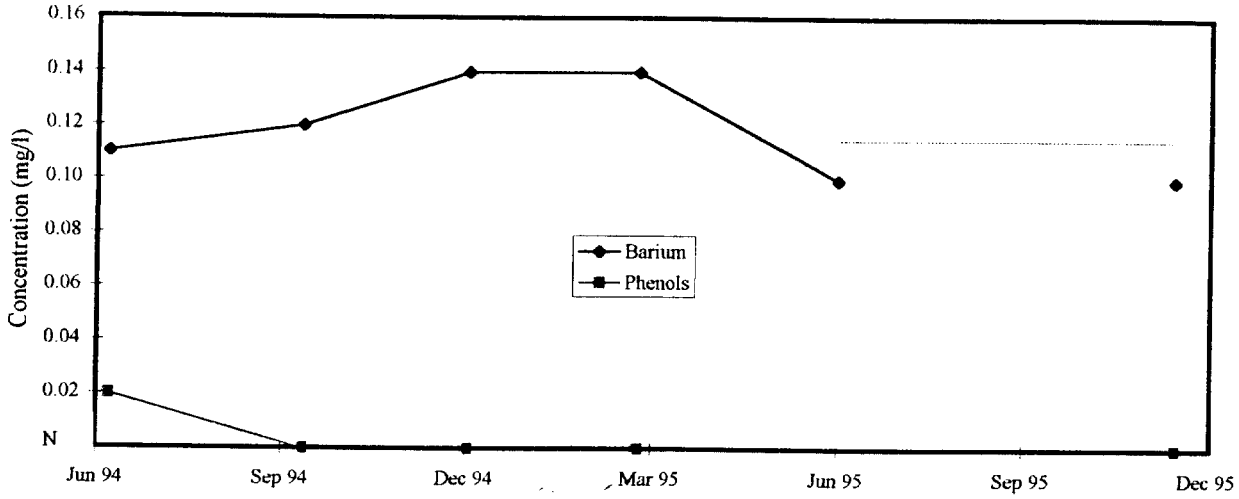

FIGURE 5B
AW-5 - 1994 & 1995 Fe, Mn & Sulfide
AMERICAN WRITING PAPER CO. UNIT

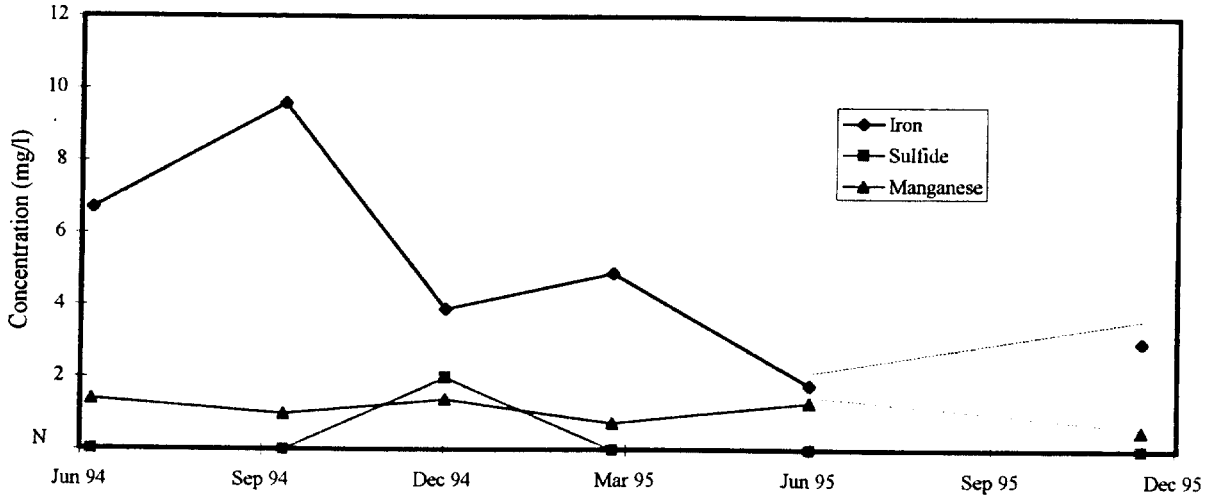

FIGURE 5C
AW-5 - 1994 & 1995 Mean TOC, Na, Cl & Sulfate
AMERICAN WRITING PAPER CO. UNIT

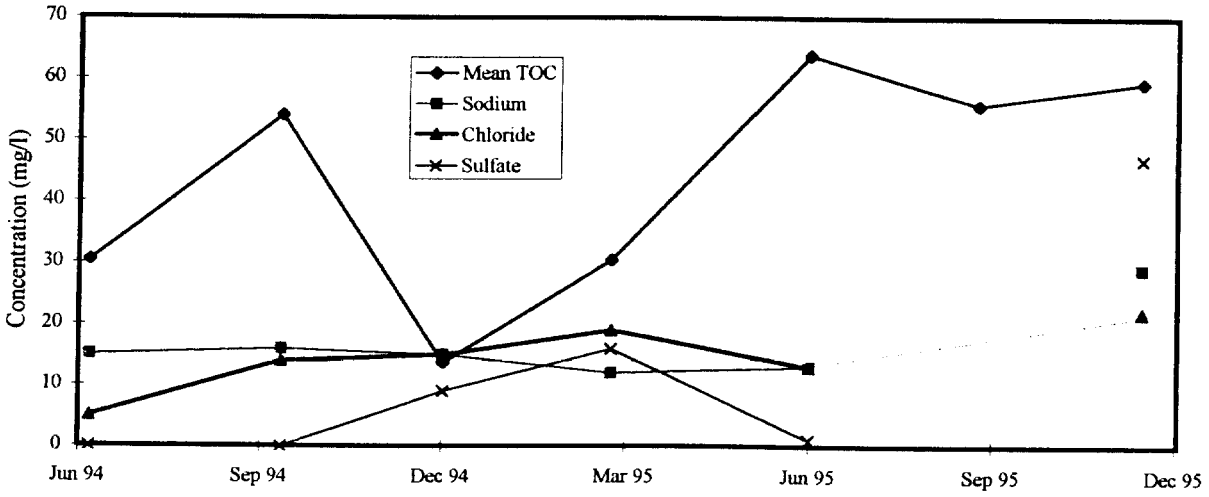

FIGURE 1 1996 to 1998 SODIUM
AMERICAN WRITING PAPER CO. UNIT

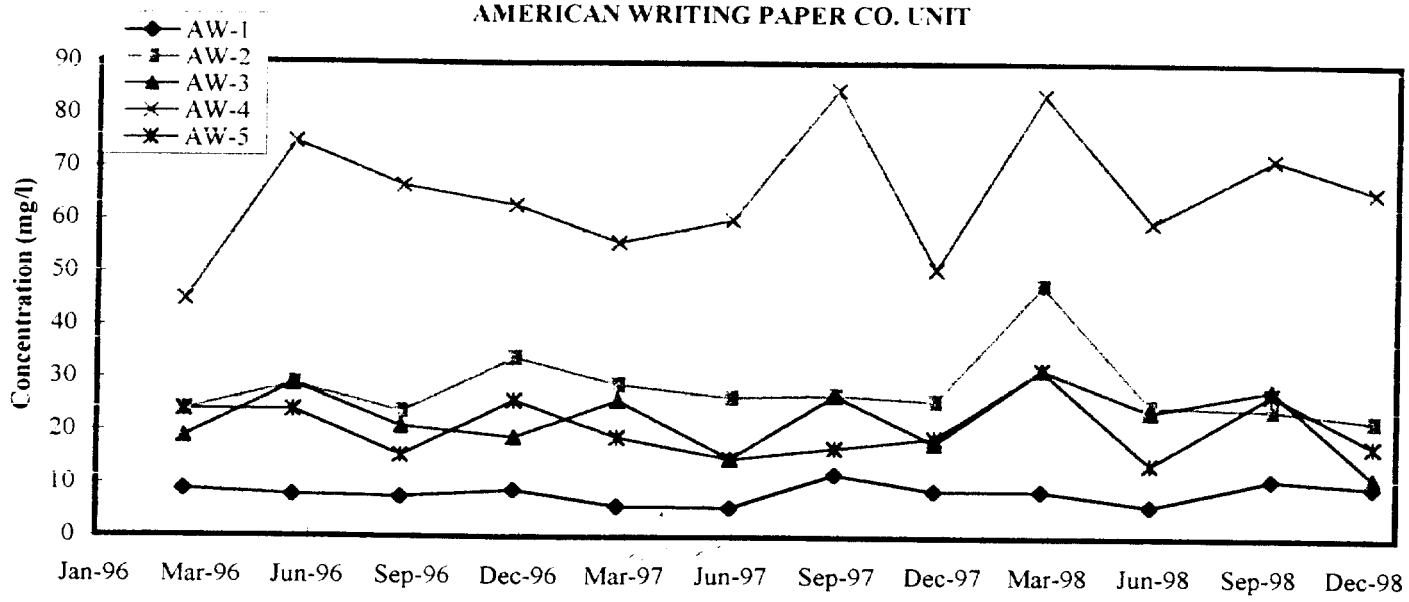

FIGURE 2 1996 to 1998 TOLUENE
AMERICAN WRITING PAPER CO. UNIT

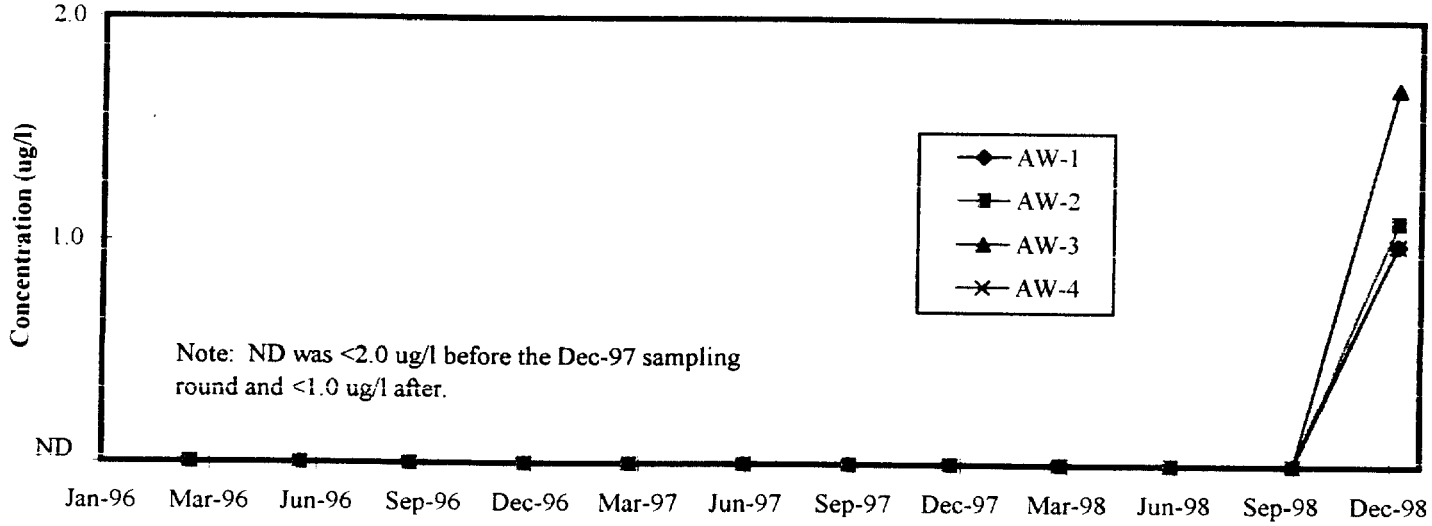

FIGURE 3 1996 to 1998 1,1-DICHLOROETHANE
AMERICAN WRITING PAPER CO. UNIT

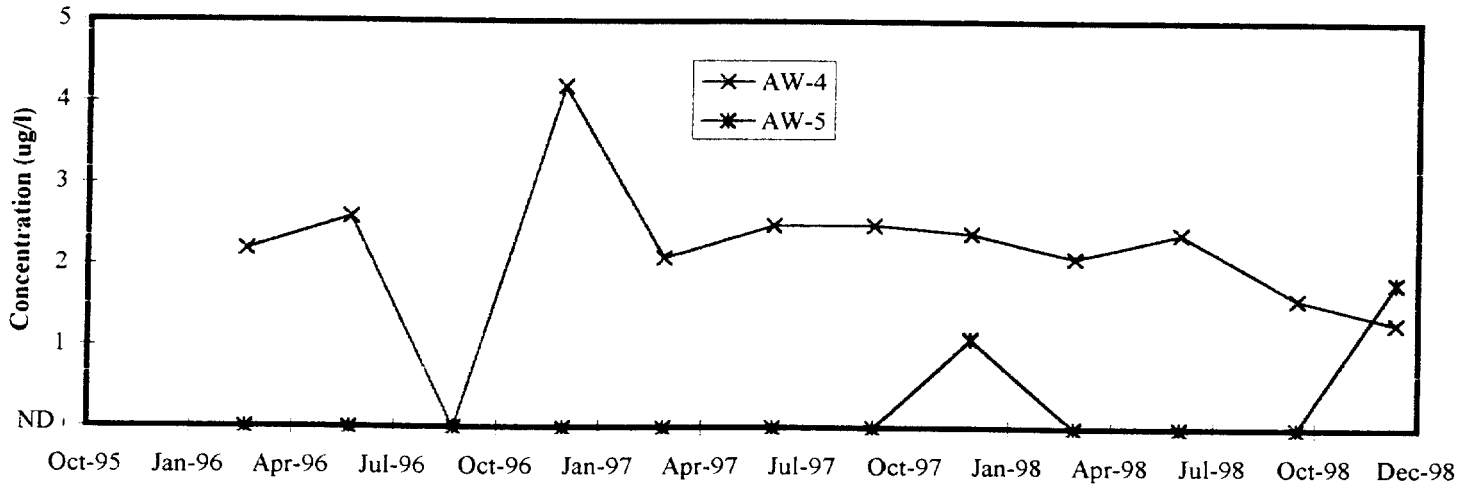

FIGURE 4 1996 to 1998 OTHER VOC IN WELL AW-5
AMERICAN WRITING PAPER CO. UNIT

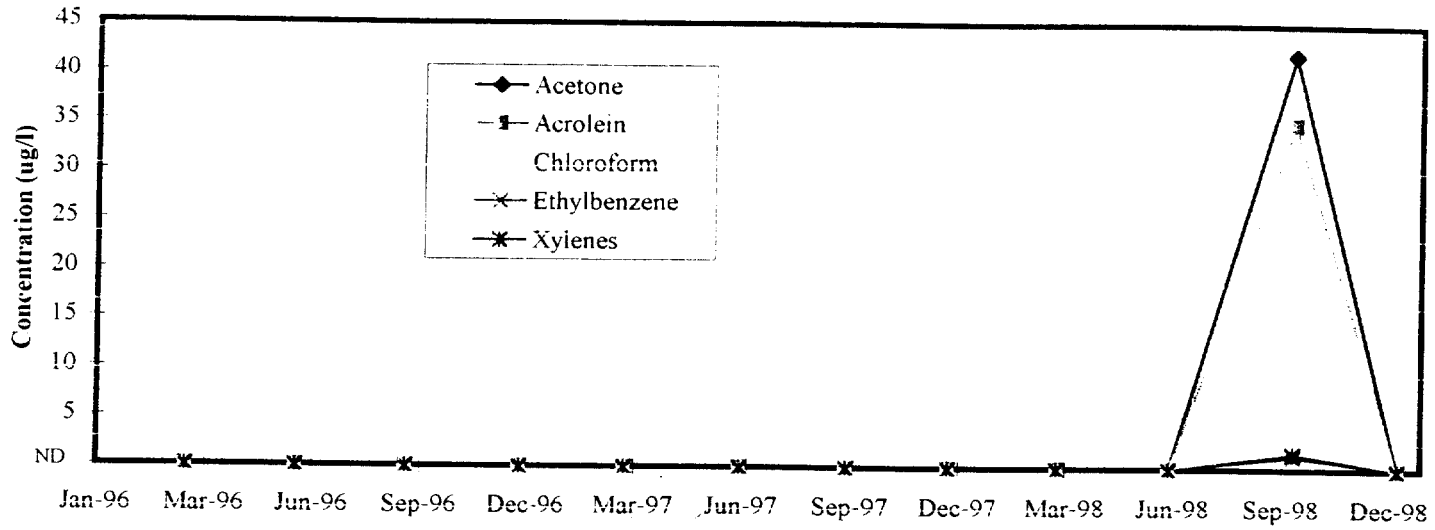

FIGURE 5 1996 TO 1998 pH
AMERICAN WRITING PAPER CO. UNIT

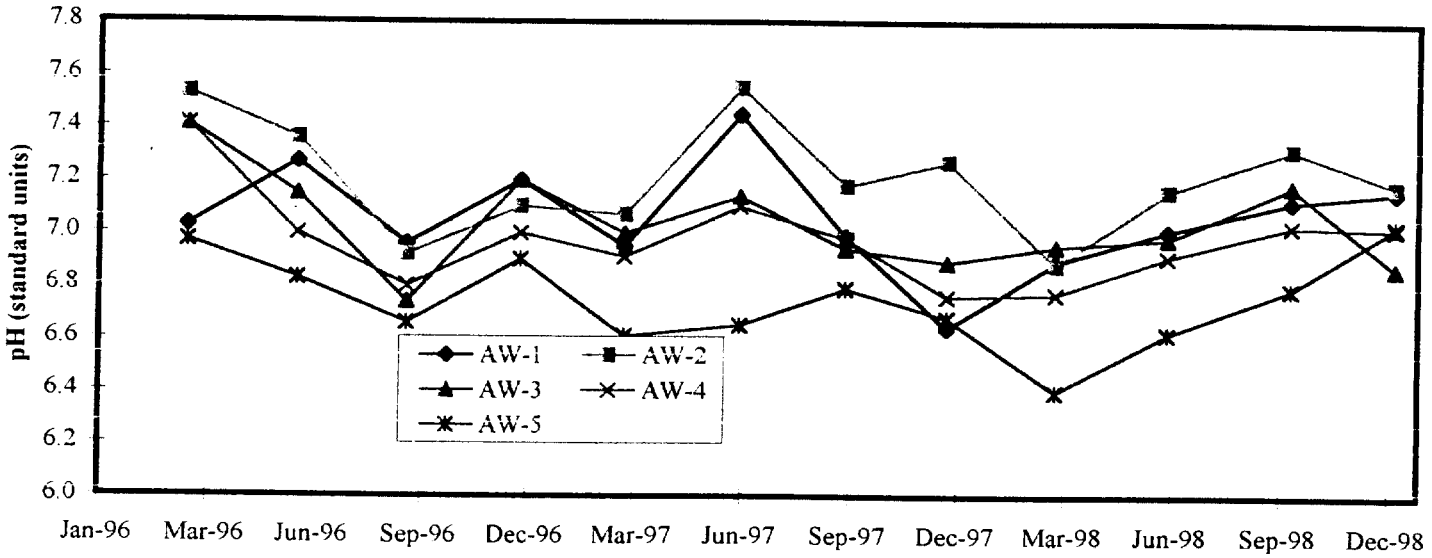

FIGURE 6 1996 TO 1998 SPECIFIC CONDUCTANCE
AMERICAN WRITING PAPER CO. UNIT

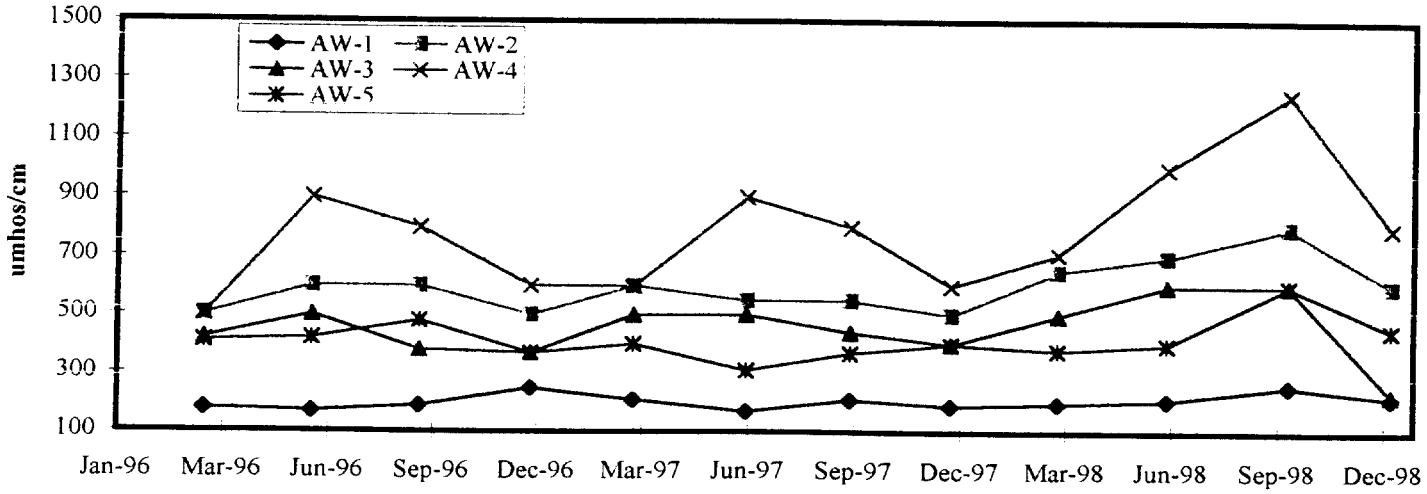

FIGURE 7 1996 to 1998 WATER LEVEL ELEVATIONS
AMERICAN WRITING PAPER CO. UNIT

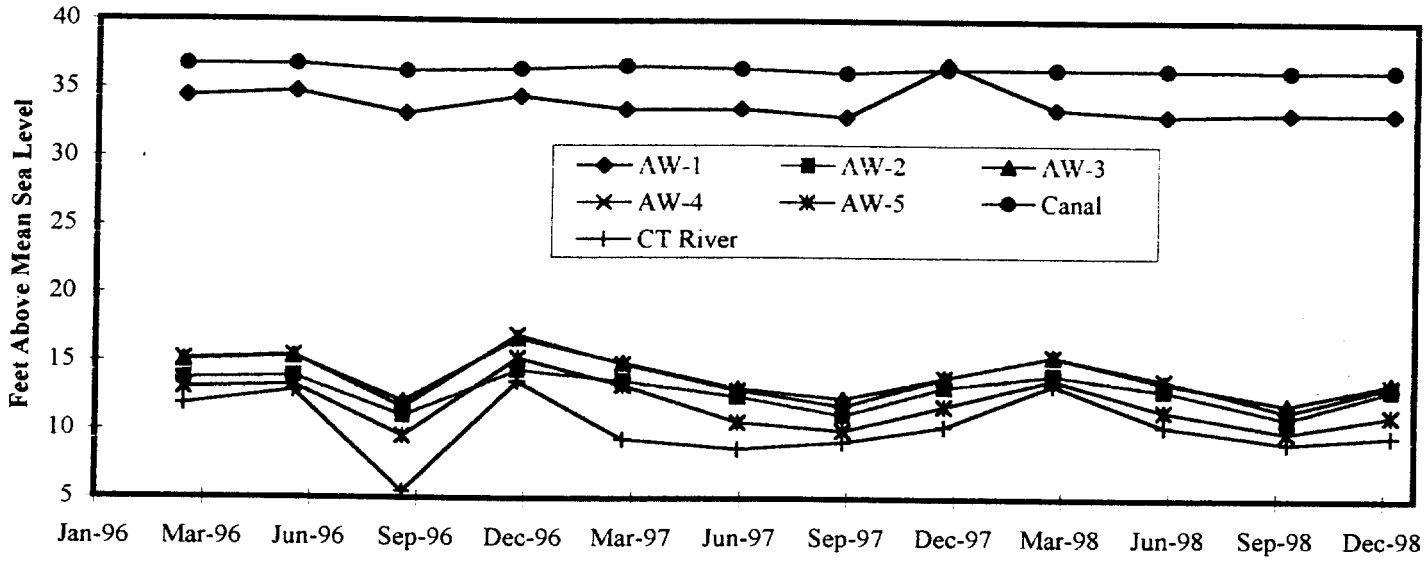

TABLE 1A - 1994-1995 RCRA MONITORING DATA - WELL AW-1
AMERICAN WRITING PAPER CO. UNIT ANALYTICAL DATA

PARAMETER	USEPA MCL	CTDPH DWS	CTDEP GWPC	SAMPLING DATE 6/21/94	9/28/94	12/21/94	3/17/95	6/26/95	9/21/95	12/14/95
INORGANIC mg/l										
Arsenic	0.05+	0.05	0.05	0.014	0.013	0.004	<0.003	0.007	[illegible]	0.009
Barium	2	1	1	0.07	0.09	0.07	0.05	0.04	0.07	0.05
Cadmium	0.005	0.005	0.005	[illegible]	[illegible]	[illegible]	<0.005	<0.005	[illegible]	<0.05
Chloride	250*			11	16	13 B	13	12	19	9
Chromium	0.1	0.05	0.05	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Iron	0.3*			0.17	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
Lead	0.015	0.015	0.015	<0.01	<0.01	0.01	<0.01	<0.01	<0.01	<0.01
Manganese	0.05*	5		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Mercury	0.002	0.002	0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.001
Selenium	0.05	0.01	0.05	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Silver	0.05+	0.05	0.036	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Sodium		20		10	12	9	8	9	15	9
Sulfate	250*			13	18	14	18	9	14	9
Sulfide				<1.0	<1	<1	<1	<4	<4	<1
Phenols mg/l				0.005	0.03	<0.005	<0.005	<0.005	0.008	<0.005
TOC-1 mg/l				20.4	12.4	5.33	7.44	9.49	18.6	17
TOC-2 mg/l					15.5	4.48	4.81	9.35	22.0	15
TOC-3 mg/l					27.7	4.14	7.50	10.9	10.6	14
TOC-4 mg/l					8.9	12.0	4.40	16.3	16.2	16
Mean TOC mg/l					16.13	6.49	6.04	11.51	16.85	15.5
TPH mg/l			0.5	<1	<1	<1	<1	<1	<1	<1
VOCs ug/l										
1,1,1-Trichloroethane	200	200	200	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,2,2-Tetrachloroethane			0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,2-Trichloroethane	5		5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1-Dichloroethane			70	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1-Dichloroethene	7	7	7	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2,3-Trichloropropane			1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloroethane	5	1	1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	2.0
1,2-Dichloropropane	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,4-Dichloro-2-butene				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
2-Butanone				<20	<20	<20	<20	<20	<20	<20
2-Chloroethyl Vinyl Ether				<10	<10	<10	<10	<10	<10	<10
2-Hexanone				<10	<10	<10	<10	<10	<10	<10
4-Methyl-2-Pentanone				<10	<10	<10	<10	<10	<10	<10
Acetone			700	<100	<100	<100	<100	<100	<100	<100
Acrolein				<25	<25	<25	<25	<25	<25	<25
Acrylonitrile		35	0.5	<10	<10	<10	<10	<10	<10	<10
Benzene	5	1	1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromodichloromethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromoform			4	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromomethane				<10	<10	<10	<10	<10	<10	<10
Carbon Disulfide				<2.0	3.2 B	3.6 B	<2.0	<2.0	<2.0	<2.0
Carbon Tetrachloride	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chlorobenzene	100		100	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chlorodibromomethane			500	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chloroethane				<10	<10	<10	<10	<10	<10	<10
Chloroform			6	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chloromethane				<10	<10	<10	<10	<10	<10	<10
cis-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Dibromomethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Dichlorodifluoromethane				<2.0	<2.0	<2.0	<2.0	<10	<10	<10
Ethanol				<5000	<5000	<5000	<5000	<5000	<5000	<5000
Ethyl Methacrylate				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Ethylbenzene			700	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Iodomethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Methylene Chloride	5	25	5	<2.0	<2.0	12 B	<2.0	<2.0	<2.0	<2.0
Styrene	100		100	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Tetrachloroethene	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Toluene	1,000	1,000	1,000	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
trans-1,2-Dichloroethene	100		5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
trans-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichloroethene	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichlorofluoromethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Vinyl Acetate				<10	<10	<10	<10	<10	<10	<10
Vinyl Chloride	2	2	2	<10	<10	<10	<10	<10	<10	<10
Xylene	10,000		530	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0

MCL - USEPA Maximum Contaminant Level, secondary MCL (*), or National Drinking Water Regulations (+)
DWS - CT Dept. of Public Health Drinking Water Standard
B - Found in trace or blank contamination
GWPC - CTDEP GA Groundwater Protection Criteria (1/30/96)
- 2 and 4/56 exceed MCL and/or DWS.

7/29/99

TABLE 2A - 1994-1995 RCRA MONITORING DATA - WELL AW-2
AMERICAN WRITING PAPER CO. UNIT ANALYTICAL DATA

PARAMETER	USEPA MCL	CTDPH DWS	CTDEP GWPC	SAMPLING DATE 6/21/94	9/28/94	12/21/94	3/17/95	6/26/95	9/21/95	12/14/95
INORGANIC mg/l										
Arsenic	0.05+	0.05	0.05	<0.003	<0.003	0.003	<0.003	<0.003	<0.003	<0.003
Barium	2	1	1	0.54	0.49	0.66	0.56	0.55	0.58	0.49
Cadmium	0.005	0.005	0.005	[illegible]	[illegible]	[illegible]	<0.005	<0.005	[illegible]	<0.005
Chloride	250*			13	18	16 B	17	16	19	17
Chromium	0.1	0.05	0.05	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Iron	0.3*			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Lead	0.015	0.015	0.015	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Manganese	0.05*	5		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Mercury	0.002	0.002	0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.001
Selenium	0.05	0.01	0.05	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Silver	0.05+	0.05	0.036	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Sodium		20		[illegible]	20	18	[illegible]	[illegible]	[illegible]	[illegible]
Sulfate	250*			<1	<1	6	12	18	1	9
Sulfide				<1.0	<1	<1	<1	<4	<4	<1
Phenols mg/l				0.01	0.008	0.03	<0.005	<0.005	<0.005	<0.005
TOC-1 mg/l				153	112	9.69	28.2	78.5	70.7	29
TOC-2 mg/l				[illegible]	73.1	12.9	14.9	75.1	68.9	24
TOC-3 mg/l				[illegible]	85.4	11.7	28.4	39.5	67.3	50
TOC-4 mg/l					97.1	9.87	17.0	47.3	57.1	58
Mean TOC mg/l					91.9	11.04	22.13	60.1	66	40.25
TPH mg/l			0.5	3	<1	<1	<1	<1	<1	<1
VOCs ug/l										
1,1,1-Trichloroethane	200	200	200	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,2,2-Tetrachloroethane			0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,2-Trichloroethane	5		5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1-Dichloroethane			70	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1-Dichloroethene	7	7	7	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2,3-Trichloropropane			1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloroethane	5	1	1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloropropane	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,4-Dichloro-2-butene				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
2-Butanone				<20	<20	<20	<20	<20	<20	<20
2-Chloroethyl Vinyl Ether				<10	<10	<10	<10	<10	<10	<10
2-Hexanone				<10	<10	<10	<10	<10	<10	<10
4-Methyl-2-Pentanone				<10	<10	<10	<10	<10	<10	<10
Acetone			700	<100	<100	<100	<100	<100	<100	<100
Acrolein				<25	<25	<25	<25	<25	<25	<25
Acrylonitrile		35	0.5	<10	<10	<10	<10	<10	<10	<10
Benzene	5	1	1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromodichloromethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromoform			4	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromomethane				<10	<10	<10	<10	<10	<10	<10
Carbon Disulfide				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Carbon Tetrachloride	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chlorobenzene	100		100	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chlorodibromomethane			500	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chloroethane				<10	<10	<10	<10	<10	<10	<10
Chloroform			6	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chloromethane				<10	<10	<10	<10	<10	<10	<10
cis-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Dibromomethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Dichlorodifluoromethane				<2.0	<2.0	<2.0	<2.0	<10	<10	<10
Ethanol				<5000	<5000	<5000	<5000	<5000	<5000	<5000
Ethyl Methacrylate				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Ethylbenzene			700	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Iodomethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Methylene Chloride	5	25	5	<2.0	<2.0	[illegible]	2.1 B	<2.0	<2.0	<2.0
Styrene	100		100	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Tetrachloroethene	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Toluene	1,000	1,000	1,000	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
trans-1,2-Dichloroethene	100		5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
trans-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichloroethene	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichlorofluoromethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Vinyl Acetate				<10	<10	<10	<10	<10	<10	<10
Vinyl Chloride	2	2	2	<10	<10	<10	<10	<10	<10	<10
Xylene	10,000		530	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0

MCL - USEPA Maximum Contaminant Level, secondary MCL (*), or National Drinking Water Regulations (+)
DWS - CT Dept. of Public Health Drinking Water Standard
GWPC - CTDEP GA Groundwater Protection Criteria (1/30/96)
B - [illegible] of the laboratory [illegible]
[illegible] 2 and 0.56 exceed MCL and/or DWS.

7/29/99

TABLE 3A - 1994-1995 RCRA MONITORING DATA - WELL AW-3
AMERICAN WRITING PAPER CO. UNIT ANALYTICAL DATA

PARAMETER	USEPA MCL	CTDPH DWS	CTDEP GWPC	SAMPLING DATE 6/21/94	9/28/94	12/21/94	3/17/95	6/26/95	9/21/95	12/14/95
INORGANIC mg/l										
Arsenic	0.05+	0.05	0.05	0.006	<0.003	0.004	<0.003	<0.003	<0.003	<0.003
Barium	2	1	1	0.21	0.28	0.41	0.35	0.30	0.30	0.27
Cadmium	0.005	0.005	0.005	[illegible]	[illegible]	[illegible]	<0.005	<0.005	[illegible]	<0.005
Chloride	250*			15	17	18 B	18	15	17	16
Chromium	0.1	0.05	0.05	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Iron	0.3*			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Lead	0.015	0.015	0.015	<0.01	<0.01	[illegible]	<0.01	<0.01	<0.01	<0.01
Manganese	0.05*	5						[illegible]	[illegible]	[illegible]
Mercury	0.002	0.002	0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.001
Selenium	0.05	0.01	0.05	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Silver	0.05+	0.05	0.036	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Sodium		20		[illegible]	[illegible]	16	16	17	20	16
Sulfate	250*			<1	<1	12	<1	<1	1	<1
Sulfide				<1.0	<1	<1	<1	<4	<4	<1
Phenols mg/l				0.02	0.007	<0.005	<0.005	0.007	<0.005	<0.005
TOC-1 mg/l				16.3	19.9	21.5	5.43	38.1	42.2	37
TOC-2 mg/l					28	13.3	6.77	50.0	41.3	38
TOC-3 mg/l				[illegible]	30.9	22.5	6.56	63.1	43.2	36
TOC-4 mg/l					36.6	12.4	15.6	29.0	47.1	37
Mean TOC mg/l					28.85	17.43	8.59	45.05	43.45	27.6
TPH mg/l			0.5	<1	<1	<1	<1	<1	<1	<1
VOCs ug/l										
1,1,1-Trichloroethane	200	200	200	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,2,2-Tetrachloroethane			0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,2-Trichloroethane	5		5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1-Dichloroethane			70	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1-Dichloroethene	7	7	7	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2,3-Trichloropropane			1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloroethane	5	1	1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloropropane	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,4-Dichloro-2-butene				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
2-Butanone				<20	<20	<20	<20	<20	<20	<20
2-Chloroethyl Vinyl Ether				<10	<10	<10	<10	<10	<10	<10
2-Hexanone				<10	<10	<10	<10	<10	<10	<10
4-Methyl-2-Pentanone				<10	<10	<10	<10	<10	<10	<10
Acetone			700	<100	<100	<100	<100	<100	<100	<100
Acrolein				<25	<25	<25	<25	<25	<25	<25
Acrylonitrile		35	0.5	<10	<10	<10	<10	<10	<10	<10
Benzene	5	1	1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromodichloromethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromoform			4	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromomethane				<10	<10	<10	<10	<10	<10	<10
Carbon Disulfide				5.5	9.6 B	2.4	5.5	<2.0	<2.0	<2.0
Carbon Tetrachloride	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chlorobenzene	100		100	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chlorodibromomethane			500	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chloroethane				<10	<10	<10	<10	<10	<10	<10
Chloroform			6	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chloromethane				<10	<10	<10	<10	<10	<10	<10
cis-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Dibromomethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Dichlorodifluoromethane				<2.0	<2.0	<2.0	<2.0	<10	<10	<10
Ethanol				<5000	<5000	<5000	<5000	<5000	<5000	<5000
Ethyl Methacrylate				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Ethylbenzene			700	<2.0	<2.0	2.1	<2.0	<2.0	<2.0	<2.0
Iodomethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Methylene Chloride	5	25	5	<2.0	<2.0	[illegible]	2.6 B	<2.0	<2.0	<2.0
Styrene	100		100	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Tetrachloroethene	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Toluene	1,000	1,000	1,000	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
trans-1,2-Dichloroethene	100		5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
trans-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichloroethene	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichlorofluoromethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Vinyl Acetate				<10	<10	<10	<10	<10	<10	<10
Vinyl Chloride	2	2	2	<10	<10	<10	<10	<10	<10	<10
Xylene	10,000		530	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0

MCL - USEPA Maximum Contaminant Level, secondary MCL (*), or National Drinking Water Regulations (+)

DWS - CT Dept. of Public Health Drinking Water Standard

GWPC - CTDEP GA Groundwater Protection Criteria (1/30/96)

B - Present in trace or blank contamination

2 and 1 % exceed MCL and/or DWS.

7/29/99

TABLE 4A - 1994-1995 RCRA MONITORING DATA - WELL AW-4
AMERICAN WRITING PAPER CO. UNIT ANALYTICAL DATA

PARAMETER	USEPA MCL	CTDPH DWS	CTDEP GWPC	SAMPLING DATE 6/21/94	9/28/94	12/21/94	3/17/95	6/26/95	9/21/95	12/14/95
INORGANIC mg/l										
Arsenic	0.05+	0.05	0.05	<0.003	<0.003	<0.003	<0.003	<0.003	0.005	<0.003
Barium	2	1	1	0.13	0.12	0.14	0.17	0.13	0.11	0.12
Cadmium	0.005	0.005	0.005	[illegible]	[illegible]	[illegible]	<0.005	<0.005	[illegible]	<0.005
Chloride	250*			22	17	17 B	24	22	22	20
Chromium	0.1	0.05	0.05	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Iron	0.3*			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Lead	0.015	0.015	0.015	<0.01	<0.01	0.01	<0.01	<0.01	<0.01	<0.01
Manganese	0.05*	5		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Mercury	0.002	0.002	0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002	<0.001
Selenium	0.05	0.01	0.05	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Silver	0.05+	0.05	0.036	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Sodium		20		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Sulfate	250*			146	37	60	15	191	82	133
Sulfide				<1.0	<1	<1	<1	<4	<4	<1
Phenols mg/l				0.006	<0.005	<0.005	<0.005	<0.005	0.008	<0.005
TOC-1 mg/l				9.14	28.3	7.0	17.7	31.0	13.5	75
TOC-2 mg/l					34.1	12.6	10.1	56.9	22.5	49
TOC-3 mg/l				[illegible]	51.8	15.5	34.6	34.5	8.76	57
TOC-4 mg/l					63.6	7.89	15.9	45.8	87	57
Mean TOC mg/l					44.45	10.75	19.58	42.05	32.94	59.5
TPH mg/l			0.5	<1	<1	<1	<1	<1	<1	<1
VOCs ug/l										
1,1,1-Trichloroethane	200	200	200	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,2,2-Tetrachloroethane			0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,2-Trichloroethane	5		5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1-Dichloroethane			70	2.5	<2.0	<2.0	2.7	<2.0	<2.0	2.9
1,1-Dichloroethene	7	7	7	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2,3-Trichloropropane			1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloroethane	5	1	1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloropropane	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,4-Dichloro-2-butene				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
2-Butanone				<20	<20	<20	<20	<20	<20	<20
2-Chloroethyl Vinyl Ether				<10	<10	<10	<10	<10	<10	<10
2-Hexanone				<10	<10	<10	<10	<10	<10	<10
4-Methyl-2-Pentanone				<10	<10	<10	<10	<10	<10	<10
Acetone			700	<100	<100	<100	<100	<100	<100	<100
Acrolein				<25	<25	<25	<25	<25	<25	<25
Acrylonitrile		35	0.5	<10	<10	<10	<10	<10	<10	<10
Benzene	5	1	1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromodichloromethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromoform			4	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromomethane				<10	<10	<10	<10	<10	<10	<10
Carbon Disulfide				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Carbon Tetrachloride	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chlorobenzene	100		100	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chlorodibromomethane			500	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chloroethane				<10	<10	<10	<10	<10	<10	<10
Chloroform			6	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chloromethane				<10	<10	<10	<10	<10	<10	<10
cis-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Dibromomethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Dichlorodifluoromethane				<2.0	<2.0	<2.0	<2.0	<10	<10	<10
Ethanol				<5000	<5000	<5000	<5000	<5000	<5000	<5000
Ethyl Methacrylate				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Ethylbenzene			700	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Iodomethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Methylene Chloride	5	25	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Styrene	100		100	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Tetrachloroethene	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Toluene	1,000	1,000	1,000	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
trans-1,2-Dichloroethene	100		5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
trans-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichloroethene	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichlorofluoromethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Vinyl Acetate				<10	<10	<10	<10	<10	<10	<10
Vinyl Chloride	2	2	2	<10	<10	<10	<10	<10	<10	<10
Xylene	10,000		530	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0

MCL - USEPA Maximum Contaminant Level, secondary MCL (*), or National Drinking Water Regulations (+)

DWS - CT Dept. of Public Health Drinking Water Standard

GWPC - CTDEP GA Groundwater Protection Criteria (1/30/96)

B - Present in laboratory blank and sample

[illegible] and [illegible] exceed MCL and/or DWS.

7/29/99

TABLE 5A - 1994-1995 RCRA MONITORING DATA - WELL AW-5
AMERICAN WRITING PAPER CO. UNIT ANALYTICAL DATA

PARAMETER	USEPA MCL	CTDPH DWS	CTDEP GWPC	SAMPLING DATE 6/21/94	9/28/94	12/21/94	3/17/95	6/26/95	9/21/95	12/14/95
INORGANIC mg/l										
Arsenic	0.05+	0.05	0.05	<0.003	<0.003	<0.003	<0.003	<0.003	NA	<0.003
Barium	2	1	1	0.11	0.12	0.14	0.14	0.10	NA	0.10
Cadmium	0.005	0.005	0.005	<0.01	<0.01	<0.01	<0.005	<0.005	NA	<0.005
Chloride	250*			5	14	15 B	19	13	NA	22
Chromium	0.1	0.05	0.05	<0.01	<0.01	<0.01	<0.01	<0.01	NA	<0.01
Iron	0.3*			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	NA	[illegible]
Lead	0.015	0.015	0.015	<0.01	<0.01	<0.01	<0.01	<0.01	NA	<0.01
Manganese	0.05*	5		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	NA	[illegible]
Mercury	0.002	0.002	0.002	<0.002	<0.002	<0.002	<0.002	<0.002	NA	<0.001
Selenium	0.05	0.01	0.05	<0.005	<0.005	<0.005	<0.005	<0.005	NA	<0.005
Silver	0.05+	0.05	0.036	<0.01	<0.01	<0.01	<0.01	<0.01	NA	<0.01
Sodium		20		15	16	15	12	13	NA	[illegible]
Sulfate	250*			<1	<1	9	16	1	NA	47
Sulfide				<1.0	<1	2	<1	<4	NA	<1
Phenols mg/l				0.02	<0.005	<0.005	<0.005	NA	NA	<0.005
TOC-1 mg/l				30.5	22.3	10.7	31.8	55.8	73.2	59
TOC-2 mg/l					48.2	11.8	34.8	55.9	69.6	55
TOC-3 mg/l				[illegible]	61.5	14.5	16.1	67.6	61.2	61
TOC-4 mg/l					84.6	17.7	39.1	76.6	18.9	63
Mean TOC mg/l					54.15	13.68	30.45	63.98	55.73	59.5
TPH mg/l			0.5	<1	<1	<1	<1	<1	NA	<1
VOCs ug/l										
1,1,1-Trichloroethane	200	200	200	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,2,2-Tetrachloroethane			0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1,2-Trichloroethane	5		5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1-Dichloroethane			70	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,1-Dichloroethene	7	7	7	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2,3-Trichloropropane			1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloroethane	5	1	1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloropropane	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,4-Dichloro-2-butene				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
2-Butanone				<20	<20	<20	<20	<20	<20	<20
2-Chloroethyl Vinyl Ether				<10	<10	<10	<10	<10	<10	<10
2-Hexanone				<10	<10	<10	<10	<10	<10	<10
4-Methyl-2-Pentanone				<10	<10	<10	<10	<10	<10	<10
Acetone			700	<100	<100	<100	<100	<100	<100	<100
Acrolein				<25	<25	<25	<25	<25	<25	<25
Acrylonitrile		35	0.5	<10	<10	<10	<10	<10	<10	<10
Benzene	5	1	1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromodichloromethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromoform			4	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Bromomethane				<10	<10	<10	<10	<10	<10	<10
Carbon Disulfide				<2.0	2 B	<2.0	2.3	<2.0	<2.0	<2.0
Carbon Tetrachloride	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chlorobenzene	100		100	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chlorodibromomethane			500	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chloroethane				<10	<10	<10	<10	<10	<10	<10
Chloroform			6	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Chloromethane				<10	<10	<10	<10	<10	<10	<10
cis-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Dibromomethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Dichlorodifluoromethane				<2.0	<2.0	<2.0	<2.0	<10	<10	<10
Ethanol				<5000	<5000	<5000	<5000	<5000	<5000	<5000
Ethyl Methacrylate				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Ethylbenzene			700	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Iodomethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Methylene Chloride	5	25	5	<2.0	2.7 B	<2.0	2.2 B	<2.0	<2.0	<2.0
Styrene	100		100	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Tetrachloroethene	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Toluene	1,000	1,000	1,000	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
trans-1,2-Dichloroethene	100		5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
trans-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichloroethene	5	5	5	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Trichlorofluoromethane				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Vinyl Acetate				<10	<10	<10	<10	<10	<10	<10
Vinyl Chloride	2	2	2	<10	<10	<10	<10	<10	<10	<10
Xylene	10,000		530	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0

MCL - USEPA Maximum Contaminant Level, secondary MCL (*), or National Drinking Water Regulations (+)
DWS - CT Dept. of Public Health Drinking Water Standard
GWPC - CTDEP GA Groundwater Protection Criteria (1/30/96)
B - [illegible] 2 and [illegible] exceed MCL and/or DWS.
NA - Not Analyzed

TABLE 1 - 1997-1998 RCRA MONITORING DATA - WELL AW-1
AMERICAN WRITING PAPER CO. UNIT

PARAMETER	USEPA CTDPH MCLs	CTDPH Action Levels	CTDEP GWPC	SAMPLING DATE 3/13/97	6/16/97	9/11/97	12/4/97	3/5/98	6/5/98	9/15/98	12/10/98
Sodium (mg/l)		28		6	5.7	12	9	9	6.2	11.2	10.0
VOCs (ug/l)											
1,1,1-Trichloroethane	200	200	200	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1,2,2-Tetrachloroethane			0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1,2-Trichloroethane	5		5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethane			70	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethene	7	7	7	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2,3-Trichloropropane			1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloroethane	5	1		<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2-Dichloropropane	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,4-Dichloro-2-butene				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
2-Butanone				<20	<20	<20	<20	<20	<20	<20	<20
2-Chloroethyl Vinyl Ether				<10	<10	<10	<10	<10	<10	<10	<10
2-Hexanone				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
4-Methyl-2-Pentanone				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Acetone			700	<100	<100	<100	<20	<20	<20	<20	<20
Acrolein				<25	<25	<25	<25	<25	<25	<25	<25
Acrylonitrile		35	0.5	<10	<10	<10	<10	<10	<10	<10	<10
Benzene	5	1	1	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromodichloromethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromoform			4	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromomethane				<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
Carbon Disulfide				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Carbon Tetrachloride	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chlorobenzene	100		100	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chlorodibromomethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chloroethane				<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
Chloroform			6	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chloromethane				<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
cis-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Dibromomethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Dichlorodifluoromethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Ethanol				<5000	<5000	<5000	<5000	<5000	<5000	<5000	<5000
Ethyl Methacrylate				<2.0	<2.0	<2.0	<5.0	<5.0	<5.0	<5.0	<5.0
Ethylbenzene			700	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Iodomethane				<2.0	<2.0	<2.0	<5.0	<5.0	<5.0	<5.0	<5.0
Methylene Chloride	5	25	5	<2.0	<2.0	13B	<2.0	<2.0	<2.0	<2.0	4.4B
Styrene	100		100	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Tetrachloroethene	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Toluene	1,000	1,000	1,000	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	1.0
trans-1,2-Dichloroethene	100		5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
trans-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichloroethene	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichlorofluoromethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Vinyl Acetate				<10	<10	<10	<10	<10	<10	<10	<10
Vinyl Chloride	2	2	2	<10	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0
Xylene	10,000		530	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
pH (standard units)			6.5-8.5	6.95	7.45	6.99	6.64	6.89	7.01	7.12	7.16
Specific Conductance (uS/cm)				210	170	210	190	200	210	260	220
Temperature (celsius)				11	13	16	10	8.5	16	25	16.7
Top of PVC Elevation (ftmsl)				43.13	43.13	43.13	43.13	43.13	43.13	43.13	43.13
Depth to Water (ft)				9.58	9.56	10.12	6.34	9.56	10.00	9.87	9.84
Water Level Elevation (ftmsl)				33.55	33.57	33.01	36.79	33.57	33.13	33.26	33.29
Well Length (ft)				20.9	20.9	20.9	20.9	20.9	20.9	20.9	20.9
Well Bottom Elevation (ftmsl)				22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2

MCL - USEPA Maximum Contaminant Level, secondary MCL (*), or National Drinking Water Regulations (+)

GWPC - CTDEP GA Groundwater Protection Criteria (1/30/96)

NA Not analyzed

<2 and 4.56 exceed MCL and/or Action Levels.

B - Result indicative of blank contamination

TABLE 2 - 1997-1998 RCRA MONITORING DATA - WELL AW-2
AMERICAN WRITING PAPER CO. UNIT

PARAMETER	USEPA CTDPH MCLs	CTDPH Action Levels	CTDEP GWPC	SAMPLING DATE 3/13/97	6/16/97	9/11/97	12/4/97	3/5/98	6/5/98	9/15/98	12/10/98
Sodium (mg/l)		28		29	26.5	27	26	25	25.1	24.4	22.4
VOCs (ug/l)											
1,1,1-Trichloroethane	200	200	200	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1,2,2-Tetrachloroethane			0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1,2-Trichloroethane	5		5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethane			70	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethene	7	7	7	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2,3-Trichloropropane			1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloroethane	5	1		<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2-Dichloropropane	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,4-Dichloro-2-butene				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
2-Butanone				<20	<20	<20	<20	<20	<20	<20	<20
2-Chloroethyl Vinyl Ether				<10	<10	<10	<10	<10	<10	<10	<10
2-Hexanone				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
4-Methyl-2-Pentanone				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Acetone			700	<100	<100	<100	<20	<20	<20	<20	<20
Acrolein				<25	<25	<25	<25	<25	<25	<25	<25
Acrylonitrile		35	0.5	<10	<10	<10	<10	<10	<10	<10	<10
Benzene	5	1	1	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromodichloromethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromoform			4	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromomethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Carbon Disulfide				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Carbon Tetrachloride	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chlorobenzene	100		100	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chlorodibromomethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chloroethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Chloroform			6	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chloromethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
cis-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Dibromomethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Dichlorodifluoromethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Ethanol				<5000	<5000	<5000	<5000	<5000	<5000	<5000	<5000
Ethyl Methacrylate				<2.0	<2.0	<2.0	<5.0	<5.0	<5.0	<5.0	<5.0
Ethylbenzene			700	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Iodomethane				<2.0	<2.0	<2.0	<5.0	<5.0	<5.0	<5.0	<5.0
Methylene Chloride	5	25	5	<2.0	<2.0	20B	<2.0	<2.0	<2.0	18B	4.8B
Styrene	100		100	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Tetrachloroethene	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Toluene	1,000	1,000	1,000	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	1.1
trans-1,2-Dichloroethene	100		5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
trans-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichloroethene	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichlorofluoromethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Vinyl Acetate				<10	<10	<10	<10	<10	<10	<10	<10
Vinyl Chloride	2	2	2	<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Xylene	10,000		530	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
pH (standard units)			6.5-8.5	7.07	7.55	7.18	7.27	6.88	7.16	7.32	7.18
Specific Conductance (uS/cm)				600	550	550	500	650	700	800	600
Temperature (celsius)				9	13	14	11	9.4	15	18.9	11
Top of PVC Elevation (ftmsl)				20.95	20.95	20.95	20.95	20.95	20.95	20.95	20.95
Depth to Water (ft)				7.30	8.45	9.81	7.72	6.87	7.89	10.00	7.86
Water Level Elevation (ftmsl)				13.65	12.5	11.14	13.23	14.08	13.06	10.95	13.09
Well Length (ft)				13.8	13.8	13.8	13.8	13.8	13.8	13.8	13.8
Well Bottom Elevation (ftmsl)				7.2	7.2	7.2	7.2	7.2	7.2	7.2	7.2

MCL - USEPA Maximum Contaminant Level, secondary MCL (*), or National Drinking Water Regulations (+)

GWPC - CTDEP GA Groundwater Protection Criteria (1/30/96)

NA Not analyzed

· 2 and 0.56 exceed MCL and/or Action Levels.

B - Result indicative of blank contamination

TABLE 3 - 1997-1998 RCRA MONITORING DATA - WELL AW-3
AMERICAN WRITING PAPER CO. UNIT

PARAMETER	USEPA CTDPH MCLs	CTDPH Action Levels	CTDEP GWPC	SAMPLING DATE							
				3/13/97	6/16/97	9/11/97	12/4/97	3/5/98	6/5/98	9/15/98	12/10/98
Sodium (mg/l)		28		26	15	27	18	[illegible]	24.0	[illegible]	11.7
VOCs (ug/l)											
1,1,1-Trichloroethane	200	200	200	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1,2,2-Tetrachloroethane			0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1,2-Trichloroethane	5		5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethane			70	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethene	7	7	7	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2,3-Trichloropropane			1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloroethane	5	1		<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2-Dichloropropane	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,4-Dichloro-2-butene				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
2-Butanone				<20	<20	<20	<20	<20	<20	<20	<20
2-Chloroethyl Vinyl Ether				<10	<10	<10	<10	<10	<10	<10	<10
2-Hexanone				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
4-Methyl-2-Pentanone				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Acetone			700	<100	<100	<100	<20	<20	<20	<20	<20
Acrolein				<25	<25	<25	<25	<25	<25	<25	<25
Acrylonitrile		35	0.5	<10	<10	<10	<10	<10	<10	<10	<10
Benzene	5	1	1	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromodichloromethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromoform			4	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromomethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Carbon Disulfide				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Carbon Tetrachloride	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chlorobenzene	100		100	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chlorodibromomethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chloroethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Chloroform			6	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chloromethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
cis-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Dibromomethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Dichlorodifluoromethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Ethanol				<5000	<5000	<5000	<5000	<5000	<5000	<5000	<5000
Ethyl Methacrylate				<2.0	<2.0	<2.0	<5.0	<5.0	<5.0	<5.0	<5.0
Ethylbenzene			700	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Iodomethane				<2.0	<2.0	<2.0	<5.0	<5.0	<5.0	<5.0	<5.0
Methylene Chloride	5	25	5	<2.0	<2.0	13B	<2.0	<2.0	15B	19B	4.6B
Styrene	100		100	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Tetrachloroethene	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Toluene	1,000	1,000	1,000	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	1.7
trans-1,2-Dichloroethene	100		5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
trans-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichloroethene	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichlorofluoromethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Vinyl Acetate				<10	<10	<10	<10	<10	<10	<10	<10
Vinyl Chloride	2	2	2	<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Xylene	10,000		530	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
pH (standard units)			6.5-8.5	7.00	7.14	6.94	6.89	6.95	6.98	7.18	6.87
Specific Conductance (uS/cm)				500	500	440	400	500	600	600	230
Temperature (celsius)				9	13	14	11	10	14	21.3	9.6
Top of PVC Elevation (ftmsl)				22.10	22.10	22.10	22.10	22.10	22.10	22.10	22.10
Depth to Water (ft)				7.12	9.00	9.73	8.19	6.65	8.52	10.10	8.53
Water Level Elevation (ftmsl)				14.98	13.10	12.37	13.91	15.45	15.45	15.45	15.45
Well Length (ft)				13.8	13.8	13.8	13.8	13.8	13.8	13.8	13.8
Well Bottom Elevation (ftmsl)				8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3

MCL - USEPA Maximum Contaminant Level, secondary MCL (*), or National Drinking Water Regulations (+)

[illegible]2 and 1.56 exceed MCL and/or Action Levels.

GWPC - CTDEP GA Groundwater Protection Criteria (1/30/96)

NA - Not analyzed

B - Result indicative of blank contamination

TABLE 4 - 1997-1998 RCRA MONITORING DATA - WELL AW-4
AMERICAN WRITING PAPER CO. UNIT

PARAMETER	USEPA CTDPH MCLs	CTDPH Action Levels	CTDEP GWPC	SAMPLING DATE							
				3/13/97	6/16/97	9/11/97	12/4/97	3/5/98	6/5/98	9/15/98	12/10/98
Sodium (mg/l)		28		56	60.2	85	51	84	60.8	72.8	56
VOCs (ug/l)											
1,1,1-Trichloroethane	200	200	200	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1,2,2-Tetrachloroethane			0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1,2-Trichloroethane	5		5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethane			70	2.1	2.5	2.5	2.4	2.1	2.4	1.6	1.3
1,1-Dichloroethene	7	7	7	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2,3-Trichloropropane			1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloroethane	5	1		<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2-Dichloropropane	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,4-Dichloro-2-butene				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
2-Butanone				<20	<20	<20	<20	<20	<20	<20	<20
2-Chloroethyl Vinyl Ether				<10	<10	<10	<10	<10	<10	<10	<10
2-Hexanone				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
4-Methyl-2-Pentanone				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Acetone			700	<100	<100	<100	<20	<20	<20	<20	<20
Acrolein				<25	<25	<25	<25	<25	<25	<25	<25
Acrylonitrile		35	0.5	<10	<10	<10	<10	<10	<10	<10	<10
Benzene	5	1	1	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromodichloromethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromoform			4	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromomethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Carbon Disulfide				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Carbon Tetrachloride	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chlorobenzene	100		100	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chlorodibromomethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chloroethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Chloroform			6	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chloromethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
cis-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Dibromomethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Dichlorodifluoromethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Ethanol				<5000	<5000	<5000	<5000	<5000	<5000	<5000	<5000
Ethyl Methacrylate				<2.0	<2.0	<2.0	<5.0	<5.0	<5.0	<5.0	<5.0
Ethylbenzene			700	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Iodomethane				<2.0	<2.0	<2.0	<5.0	<5.0	<5.0	<5.0	<5.0
Methylene Chloride	5	25	5	<2.0	2.6B	18B	<2.0	<2.0	13B	15B	2.1B
Styrene	100		100	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Tetrachloroethene	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Toluene	1,000	1,000	1,000	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	1.0
trans-1,2-Dichloroethene	100		5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
trans-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichloroethene	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichlorofluoromethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Vinyl Acetate				<10	<10	<10	<10	<10	<10	<10	<10
Vinyl Chloride	2	2	2	<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Xylene	10,000		530	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
pH (standard units)			6.5-8.5	6.91	7.10	6.98	6.76	6.77	6.91	7.03	7.02
Specific Conductance (uS/cm)				600	900	800	600	710	1000	1250	800
Temperature (celsius)				8	15	14	11	9.2	15	20	8.0
Top of PVC Elevation (ftmsl)				22.19	22.19	22.19	22.19	22.19	22.19	22.19	22.19
Depth to Water (ft)				7.31	9.20	10.38	8.26	6.69	8.35	10.71	8.80
Water Level Elevation (ftmsl)				14.88	12.99	11.81	13.93	15.50	13.84	11.48	13.39
Well Length (ft)				14.9	14.9	14.9	14.3	14.3	14.3	14.3	14.3
Well Bottom Elevation (ftmsl)				7.3	7.3	7.3	7.9	7.9	7.9	7.9	7.9

MCL - USEPA Maximum Contaminant Level, secondary MCL (*), or National Drinking Water Regulations (+)

GWPC - CTDEP GA Groundwater Protection Criteria (1/30/96)

NA Not analyzed

<2 and 0.56 exceed MCL and/or Action Levels.

B - Result indicative of blank contamination

TABLE 5 - 1997-1998 RCRA MONITORING DATA - WELL AW-5
AMERICAN WRITING PAPER CO. UNIT

PARAMETER	USEPA CTDPH MCLs	CTDPH Action Levels	CTDEP GWPC	SAMPLING DATE 3/13/97	6/16/97	9/11/97	12/4/97	3/5/98	6/5/98	9/15/98	12/10/98
Sodium (mg/l)		28		19	14.8	17	19	[illegible]	14.0	27.5	17.7
VOCs (ug/l)											
1,1,1-Trichloroethane	200	200	200	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1,2,2-Tetrachloroethane			0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1,2-Trichloroethane	5		5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethane			70	<2.0	<2.0	<2.0	1.1	<1.0	<1.0	<1.0	1.8
1,1-Dichloroethene	7	7	7	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2,3-Trichloropropane			1	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
1,2-Dichloroethane	5	1		<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,2-Dichloropropane	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,4-Dichloro-2-butene				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
2-Butanone				<20	<20	<20	<20	<20	<20	<20	<20
2-Chloroethyl Vinyl Ether				<10	<10	<10	<10	<10	<10	<10	<10
2-Hexanone				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
4-Methyl-2-Pentanone				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Acetone			700	<100	<100	<100	<20	<20	<20	42	<20
Acrolein				<25	<25	<25	<25	<25	<25	35	<25
Acrylonitrile		35	0.5	<10	<10	<10	<10	<10	<10	<10	<10
Benzene	5	1	1	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromodichloromethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromoform			4	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bromomethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Carbon Disulfide				<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Carbon Tetrachloride	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chlorobenzene	100		100	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chlorodibromomethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Chloroethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Chloroform			6	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	2.7	<1.0
Chloromethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
cis-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Dibromomethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Dichlorodifluoromethane				<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Ethanol				<5000	<5000	<5000	<5000	<5000	<5000	<5000	<5000
Ethyl Methacrylate				<2.0	<2.0	<2.0	<5.0	<5.0	<5.0	<5.0	<5.0
Ethylbenzene			700	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	1.4	<1.0
Iodomethane				<2.0	<2.0	<2.0	<5.0	<5.0	<5.0	<5.0	<5.0
Methylene Chloride	5	25	5	<2.0	2.4B	1.9B	<2.0	<2.0	<2.0	2.1B	2.6B
Styrene	100		100	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Tetrachloroethene	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Toluene	1,000	1,000	1,000	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
trans-1,2-Dichloroethene	100		5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
trans-1,3-Dichloropropene		10	0.5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichloroethene	5	5	5	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichlorofluoromethane				<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	<1.0	<1.0
Vinyl Acetate				<10	<10	<10	<10	<10	<10	<10	<10
Vinyl Chloride	2	2	2	<10	<10	<10	<5.0	<5.0	<5.0	<5.0	<5.0
Xylene	10,000		530	<2.0	<2.0	<2.0	<1.0	<1.0	<1.0	1.7	<1.0
pH (standard units)			6.5-8.5	6.61	6.65	6.79	6.68	6.4	6.62	6.79	7.03
Specific Conductance (uS/cm)				400	310	370	400	380	400	600	450
Temperature (celsius)				8	13	15	10	7.8	13	25	11
Top of PVC Elevation (ftmsl)				20.59	20.59	20.59	20.59	20.59	20.59	20.59	20.59
Depth to Water (ft)				7.26	9.97	10.60	8.80	6.84	9.05	10.62	9.35
Water Level Elevation (ftmsl)				13.33	10.62	9.99	11.79	13.75	11.54	9.97	11.24
Well Length (ft)				12.3	12.3	12.3	12.4	12.4	12.4	12.4	12.4
Well Bottom Elevation (ftmsl)				8.3	8.3	8.3	8.2	8.2	8.2	8.2	8.2

MCL - USEPA Maximum Contaminant Level, secondary MCL (*), or National Drinking Water Regulations (+)

GWPC - CTDEP GA Groundwater Protection Criteria (1/30/96)

NA Not analyzed

<2 and 0.56 exceed MCL and or Action Levels.

B - Result indicative of blank contamination