**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**

Interim Final 2/5/99

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS Code (CA750)
Migration of Contaminated Groundwater Under Control**

Facility Name: Crompton Manufacturing Company, Inc.
Facility Address: 280 Elm Street Naugatuck, Connecticut 06770
Facility EPA ID #: CTD001449826

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, 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 below.



If no - re-evaluate existing data, or



If data are not available, skip to #8 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 "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "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 "Migration of Contaminated Groundwater Under Control" EI pertains **ONLY** to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

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).

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2. Is **groundwater** known or reasonably suspected to be **“contaminated”**¹ above appropriately protective “levels” (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

- If yes - continue after identifying key contaminants, citing appropriate “levels,” and referencing supporting documentation.
- If no - skip to #8 and enter “YE” status code, after citing appropriate “levels,” and referencing supporting documentation to demonstrate that groundwater is not “contaminated.”
- If unknown - skip to #8 and enter “IN” status code.

Rationale and Reference(s):

Crompton Manufacturing Company, Inc. (Crompton) has been engaged in Resource Conservation and Recovery Act Voluntary Corrective Action (RCRA VCA) since 1992 at this site. Periodic groundwater monitoring of approximately 60 out of over 80 on and off site wells has been conducted since 1992. Groundwater monitoring has focused on the South Yard portion of the facility and on off site locations determined to be hydrogeologically down gradient of the plume. Currently, groundwater monitoring is performed on a quarterly basis for select monitoring wells and on a semi-annual and annual basis for others. The results are summarized, included and discussed in voluntarily prepared semi-annual status reports prepared by Crompton. The status reports are submitted to the Connecticut Department of Environmental Protection (CTDEP), the U.S. Environmental Protection Agency (EPA) as well as the Borough of Naugatuck and the Town of Beacon Falls. The most recent status reports were submitted on September 16, 2004 and April 11, 2005.

Appropriate protective “levels” used in this evaluation include the CTDEP Remediation Standard Regulations (RSRs) Surface Water Protection Criteria (SWPC) throughout the water column, Groundwater Protection Criteria (GWPC) for groundwater downgradient of property boundaries, Residential Volatilization Criteria (Res. VC) for shallow (within 30 feet of ground surface) groundwater beyond downgradient property boundaries and Industrial Commercial Volatilization Criteria (IC VC) for shallow groundwater on the site. The use of IC VC will require in the future, the implementation of an Environmental Land Use Restriction (ELUR), as described in the CTDEP RSRs.

During the most recent rounds of groundwater sampling (October 2004 and January 2005), analytical results indicate that several contaminants are present in the groundwater at concentrations exceeding both the Res. VC and the IC VC. These contaminants include acetone (most frequently), benzene, ethyl benzene, vinyl chloride, and xylenes. Exceedances occur most frequently in the South Yard of the facility, hydrogeologically downgradient of known release areas and identified AOCs within the Site. During the October 2004 groundwater sampling event, acetone was detected in on-site wells at concentrations as high as 1,000,000 µg/L in MW-169, 750,000 µg/L in MW-116, 800,000 µg/L in MW-142, and 660,000 µg/L in MW-148. During 2003, acetone concentrations were greater than 1,000,000 µg/L in several monitoring wells including MW-116, MW-142, and MW-169. In addition, aniline and n-nitrosodiphenylamine were detected on-site at elevated concentrations from multiple monitoring well locations. During the October 2004 sampling event, the highest concentrations of aniline were detected in shallow monitoring wells MW-107 (36,000 µg/L), and MW-112 (65,000 µg/L) and in the deep overburden/bedrock monitoring wells MW-116 (320,000 µg/L), MW-142 (630,000 µg/L), MW-143 (590,000 µg/L), MW-147 (540,000 µg/L), and MW-148 (560,000 µg/L). Based on groundwater modeling completed for the site in 1999, groundwater in the shallow aquifer discharges to the Naugatuck River adjacent to the facility. Groundwater in the deep overburden and bedrock aquifers discharges to the Naugatuck River downgradient of the facility. This

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 “levels” (appropriate for the protection of the groundwater resource and its beneficial uses).

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model is also supported by surface water sampling results. Groundwater monitoring results for the most recent groundwater sampling events have been included in this evaluation as the attached **Table 1**. Monitoring well locations are shown on the site plan included as the attached **Figure 1**.

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"² as defined by the monitoring locations designated at the time of this determination)?

If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"².

If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"²) - skip to #8 and enter "NO" status code, after providing an explanation.

If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

Contaminated groundwater is expected to remain within the existing area of the groundwater contaminant plume. This evaluation is based on two primary factors.

First, the site conceptual model indicates that contaminated groundwater from the site discharges to the Naugatuck River. This discharge occurs via two pathways. One, shallow groundwater from the site migrates in an easterly direction resulting in discharge to the river adjacent to the site. Two, deep overburden and bedrock groundwater assumes a southerly flow and discharges to the river at a point downstream of the site. For this reason, the Naugatuck River acts as a downgradient migration boundary. The site conceptual model was developed in December 1999 and was included most recently in the Supplemental Site Investigation Work Plan submitted to the USEPA and the CTDEP in September 2004. This model is supported by the surface water sampling results.

Second, groundwater monitoring wells have been installed at various locations off site and hydraulically downgradient of the current plume boundaries. These monitoring wells have been designed to monitor groundwater conditions in the shallow overburden, the deep overburden, and the bedrock aquifers. Furthermore, monitoring wells were installed on the eastern side of the Naugatuck River to monitor for contamination migration beyond the river as well. These off site monitoring wells have been included in the groundwater monitoring plan and groundwater is collected and analyzed on a regular basis. Current and historical data indicates that groundwater contamination off site is not advancing beyond historical boundaries determined during previous groundwater sampling events. The results of offsite groundwater sampling are included as a portion of a semi-annual status report and submitted to the Connecticut Department of Environmental Protection (CTDEP) and the U.S. Environmental Protection Agency (EPA). A summary of the most recent analytical results from the 2004 and January 2005 sampling events has been included as the attached **Table 1**.

² "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation

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4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

If yes - continue after identifying potentially affected surface water bodies.

If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

The Naugatuck River abuts the eastern boundary of the Site. Groundwater beneath the site flows in a east-southeast direction. Surface water samples are collected from ten monitoring points on a quarterly basis. During the most recent sampling events (October 2004, January 2005, and March 2005), site related contaminants were detected in six surface water samples. During the October 2004 sampling event, aniline was detected in surface water sample SP-2 at 0.010 mg/L and cis-1,2-dichloroethylene was detected in surface water sample SP-7 at 0.001 mg/L. During the January 11-14, 2005 sampling event, aniline was detected in surface water sample SP-2 (0.095) mg/L, SP-4 (0.092) mg/L, SP-7 (0.032 mg/L), and SP-10 (0.005 mg/L). Acetone was detected in SP-2 (0.009 mg/L), SP-3 (0.010 mg/L), and SP-6 (0.007 mg/L). During the January 20, 2005 sampling event, acetone was detected in SP-10 at 0.005 mg/L. Previous sampling events have shown similar results with some seasonal variations due to changes in temperature and stream flows. Site related contaminants detected in surface water samples have also included xylenes. The results of surface water sampling are included as a portion of a semi-annual status report and submitted to the Connecticut Department of Environmental Protection (CTDEP) and the U.S. Environmental Protection Agency (EPA). The results of the October 2004, January 2005, and March 2005 sampling events are included as the attached **Table 2**.

In addition to current and historical surface water analysis, the site conceptual model for the hydrogeologic characteristics indicates that groundwater from the site discharges to the Naugatuck River. Shallow groundwater in the eastern and southeastern portions of the site discharges directly to the river adjacent to the site. Groundwater in the deep overburden and bedrock aquifers assume a southerly flow and discharges to the Naugatuck River at locations farther downstream.

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be "**insignificant**" (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration³ of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³

³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

___ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

An evaluation of the maximum detected groundwater concentrations compared to the surface water concentrations for two of the major site related contaminants is as follows:

Aniline: During the October 2004 sampling event, the maximum groundwater concentration was 630,000 µg/L found in MW-142. High concentrations of aniline were also detected in shallow monitoring wells MW-107 (36,000 µg/L), and MW-112 (65,000 µg/L) and in the deep overburden/bedrock monitoring wells MW-116, MW-142, MW-143, MW-147, and MW-148. These levels correspond to one surface water detection of aniline at sample point SP-2 of 10 µg/L. Over the previous four sampling events, similar results were observed with a maximum surface water concentration of 11 µg/L detected in October 2003.

During the January 2005 sampling event, the maximum groundwater concentration was 520,000 µg/L found in MW-147. High concentrations of aniline were also detected in shallow monitoring well MW-112 (65,000 µg/L), and in the deep overburden/bedrock monitoring wells MW-116, MW-142, MW-143, MW-147, and MW-148. These levels correspond to surface water detections of aniline January 11-14, 2005 at sample points SP-2 (0.095) mg/L, SP-4 (0.092) mg/L, SP-7 (0.032 mg/L), and SP-10 (0.005 mg/L). No aniline was detected in surface water samples collected in a follow up round on January 20, 2005.

Acetone: During the October 2004 sampling event, the maximum groundwater concentration was 1,100,000 µg/L detected in MW-169. Acetone was also detected at concentrations as high as 750,000 µg/L in MW-116, 800,000 µg/L in MW-142, and 660,000 µg/L in MW-148. Results from the October 2004 surface water sampling event indicate that acetone was not present in the surface water at levels above the laboratory detection limits. These results correspond to the results observed over the previous four sampling events in which acetone was not detected in any surface water samples.

During the January 2005 sampling event, the maximum groundwater concentration was 1,000,000 µg/L detected in MW-169. Acetone was also detected at concentrations as high as 840,000 µg/L in MW-116, 470,000 µg/L in MW-142, and 530,000 µg/L in MW-148. These levels correspond to surface water detections of acetone January 11-14, 2005 at sample points SP-2 (0.009 mg/L), SP-3 (0.010 mg/L), and SP-6 (0.007 mg/L). During the January 20, 2005 additional sampling event, acetone was detected in SP-10 at 0.005 mg/L.

This conclusion is also based on the **Ecological Risk Assessment (ERA) of the Naugatuck River** submitted to the CTDEP and USEPA in September 2003. The ERA concluded that due to the absence of elevated concentrations of constituents at a single location for a sustained period, the ecological risk to the surface water, sediments, and ecology of the river was insignificant. This conclusion was, in part, based on calculated Hazard Quotients (HQ) for several site related contaminants detected in surface water samples. Based on these calculations and historical surface water data, the potential for adverse effects on the surface water body (Naugatuck River) was low. In addition, HQs were also calculated for site related contaminants in sediment samples collected. As with the surface water samples, the HQs for sediments were such that the overall potential for adverse environmental impact was low. One major reason for this was the amount of sediment present in the river bed. Small pockets of sediment are present in areas around boulders and in low flow areas. However, even with an isolated instance of a large detection, the river bottom structure (absence of large areas and volumes of sediment) does not allow for widespread ecological impact.

In addition, groundwater extraction at the downgradient end of the property was initiated in January 2005 under a CTDEP permit. This system was designed to inhibit further downgradient migration of the aniline

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and acetone plumes. As of August 2005, over 8 million gallons of groundwater has been extracted from primarily recover wells EW-2 and EW-3. Thus, residual impact to the surface water is expected to diminish rapidly over time.

6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?

— If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR

2) providing or referencing an interim-assessment⁵, appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

— If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

— If unknown - skip to 8 and enter “IN” status code.

Rationale and Reference(s): NA

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the “existing area of contaminated groundwater?”

✓ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the “existing area of groundwater contamination.”

— If no - enter “NO” status code in #8.

⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

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___ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

Groundwater and surface water monitoring will continue on a quarterly basis as outlined in the **Groundwater/Surface Water Monitoring Program** dated April 16, 2004 submitted to the CTDEP and USEPA. This program calls for the sampling of a total of 56 monitoring wells located in the shallow overburden, the deep overburden and the bedrock aquifers. These monitoring wells have been placed to monitor groundwater throughout the site and hydraulically downgradient of the existing plumes and AOCs identified. Surface water samples are collected on a quarterly basis from ten sampling locations on the Naugatuck River.

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), 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 YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Crompton Manufacturing Company, Inc. facility, EPA ID # CTD001449826, located at 280 Elm Street, Naugatuck, Connecticut 06770. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

___ NO - Unacceptable migration of contaminated groundwater is observed or expected.

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

Completed by David Lim *David Lim* Date 9/7/2005
USEPA Region 1

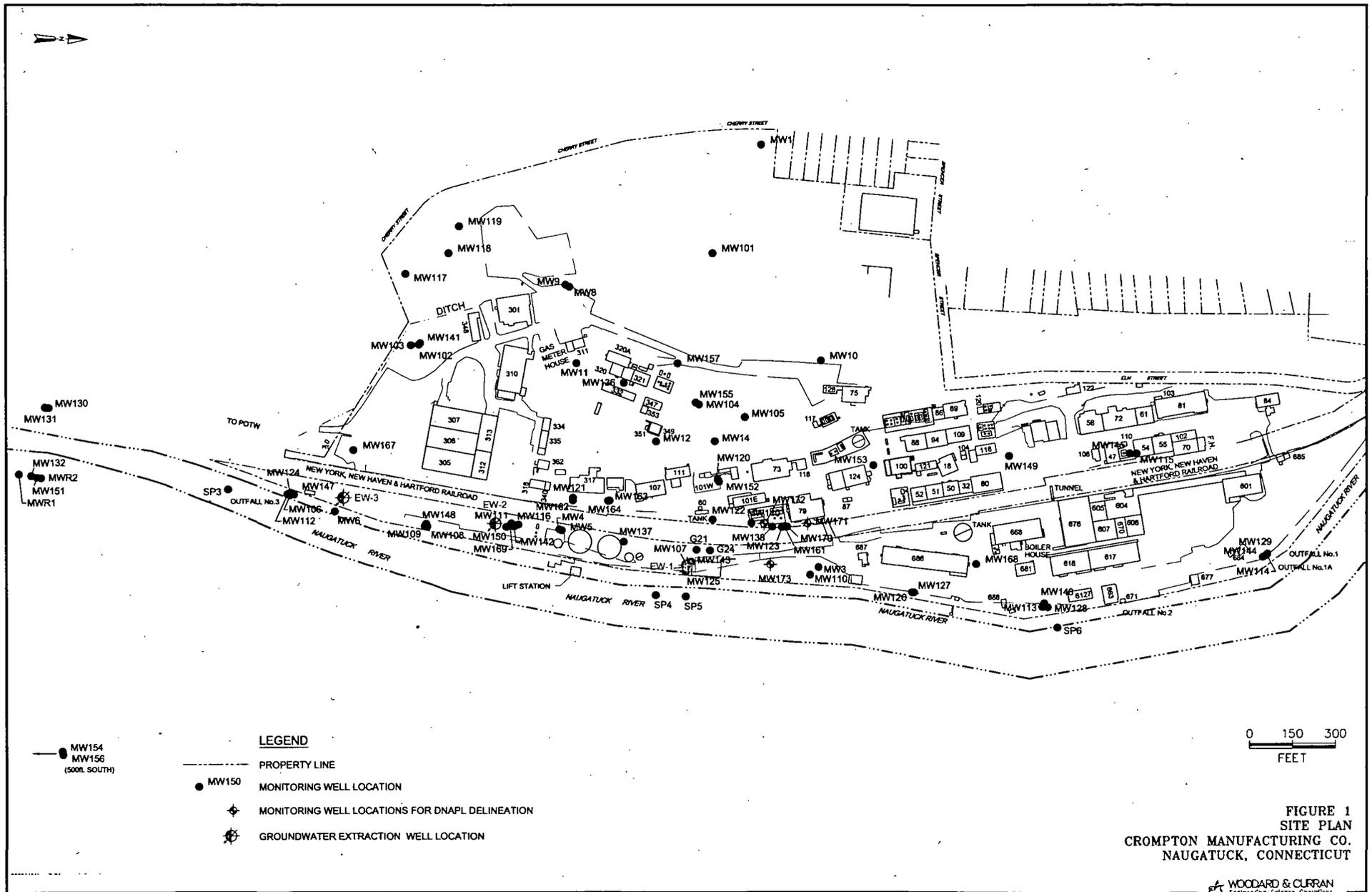
Supervisor (signature) *Matt Hoagland* Date 9/9/05
Matt Hoagland
(title) Section Chief
USEPA Region 1

Locations where References may be found:

Uniroyal Project File

Contact telephone and e-mail numbers

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**Table 1B
Off-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (µg/L)											SVOCs (µg/L)		Total Metals		
		Acetone	Benzene	Chlorobenzene	1,4-Dichlorobenzene	1,2-Dichloroethane	Ethylbenzene	Isopropylbenzene	Tetrachloroethylene	Toluene	Trichloroethylene	1,2,4-Trimethylbenzene	Total xylenes	Aniline	n-Nitrosodiphenylamine	Barium	Cadmium
SWPC		NE	710	42,000	26,000	2,970	580,000	NE	88	4,000,000	2,340	NE	NE	NE	NE	NE	0.006
Res. Vol. Criteria		50,000	215	1,800	50,000	21	50,000	NE	1,500	23,500	219	NE	21,300	NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		50,000	130	1,800	1,400	7	2,700	2,800	340	7,100	27	360	8,700	NE	NE	NE	NE
I.C. Vol. Criteria		50,000	530	6,150	50,000	90	50,000	NE	3,820	50,000	540	NE	50,000	NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		50,000	310	23,000	3,400	68	36,000	6,800	810	41,000	67	4,800	48,000	NE	NE	NE	NE
MW-R1	4/29/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	8/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	11	0.022	0.007
	1/11/2005	8	ND	ND	ND	ND	ND	ND	ND	4	ND	ND	1	15	13	NA	NA
MW-R2	4/29/2004	89	12	ND	14	ND	ND	ND	ND	160	ND	ND	ND	ND	430	ND	ND
	8/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	10/15/2004	ND	2	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	89	0.032	ND
	1/11/2005	19	11	5	ND	ND	4	5	ND	ND	ND	ND	3	41	490	NA	NA
MW-130	4/29/2004	53	ND	ND	ND	1	ND	ND	ND	3	ND	ND	ND	ND	ND	ND	ND
	8/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	10/8/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	26	ND	0.023	ND
	1/10/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA
MW-131	4/29/2004	2200	3	30	5	ND	6	ND	14	54	3	1	32	130	ND	ND	ND
	8/13/2004	ND	ND	8	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	10/8/2004	14	ND	19	ND	ND	ND	ND	ND	ND	ND	ND	ND	390	ND	0.039	ND
	1/10/2005	8	ND	3	ND	ND	ND	ND	ND	ND	ND	ND	ND	51	13	NA	NA
MW-132	4/29/2004	10	ND	ND	ND	2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	8/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	22	ND	ND	ND
	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.031	ND
MW-133	1/11/2005	15	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	7.6	ND	NA	NA
	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.012	ND
MW-134	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.029	ND

**Table 1B
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**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (µg/L)											SVOCs (µg/L)		Total Metals			
		Acetone	Benzene	Chlorobenzene	1,4-Dichlorobenzene	1,2-Dichloroethane	Ethylbenzene	Isopropylbenzene	Tetrachloroethylene	Toluene	Trichloroethylene	1,2,4-Trimethylbenzene	Total xylenes	Aniline	n-Nitrosodiphenylamine	Mercury	Lead	
MW-135	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.027	ND
MW-151	4/29/2004	ND	ND	ND	ND	3	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	8/13/2004	5	ND	2	ND	ND	ND	ND	ND	ND	ND	ND	ND	13	ND	ND	ND	ND
	1/11/2005	15	ND	ND	ND	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA
MW-154	4/29/2004	84	2	2	5	3	3	ND	ND	120	ND	1	7	ND	ND	ND	ND	ND
	8/13/2004	95	ND	ND	ND	ND	ND	ND	ND	2	ND	ND	ND	100	ND	ND	ND	ND
	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.111	ND	ND
	1/14/2005	12	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA
MW-156	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.011	ND	ND

Notes:

SWPC: CTDEP Remediation Standard Regulation (RSR) Surface Water Protection Criteria

Res. Vol. Criteria: CTDEP RSR Residential Volatilization Criteria

I.C. Vol. Criteria: CTDEP RSR Industrial Commercial Volatilization Criteria

NE: Not Established

ND: "Non-Detect" Results below laboratory analytical detection limits

Bold Type: Indicates detection above laboratory analytical detection limits

**Table 1B
Off-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

als (mg/L)	
Chromium	Lead
0.110	0.013
NE	NE
ND	ND
ND	ND
ND	ND
NA	NA
ND	ND
ND	ND
ND	ND
NA	NA
ND	ND
ND	ND
ND	ND
NA	NA
ND	ND
ND	ND
ND	ND
NA	NA
ND	ND
ND	ND
ND	ND
NA	NA
ND	ND
ND	ND

**Table 1B
Off-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Concentrations (mg/L)	
Chromium	Lead
ND	ND
ND	ND
ND	ND
NA	NA
ND	ND
ND	ND
0.021	0.138
NA	NA
ND	ND

**Table 2
Surface Water Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Surface Water Monitoring Location	Sample Collection Date	VOCs (mg/L)		SVOCs (mg/L)	
		Acetone	cis-1,2-Dichloroethylene	Aniline	Bis (2-ethylhexyl) phthalate
CT. 2002 WQS ¹ - acute , mg/l		NE	NE	NE	NE
CT 2002 WQS ¹ - chronic , mg/l		NE	NE	NE	NE
EPA 2002 WQC ² - Freshwater CMC, mg/l		NE	NE	0.057 ³	NE
EPA 2002 WQC ² - Freshwater CCC, mg/l		NE	NE	0.014 ⁴	NE
ORNL Revised SCV ⁵ (1996), mg/l		1.5	0.590	NE	0.003
Suter, 1996 ⁶ mg/l		11.2	0.031	NE	0.032
SP-1A	10/4/2004	ND	ND	ND	ND
	1/14/2005	ND	ND	ND	ND
	3/10/2005	ND	ND	ND	ND
SP-1B	10/4/2004	ND	ND	ND	ND
	1/14/2005	ND	ND	ND	ND
	3/10/2005	ND	ND	ND	ND
SP-2	10/5/2004	ND	ND	0.010	ND
	1/11/2005	0.009	ND	0.095	ND
	1/20/2005	ND/ND	ND/ND	0.0084/ND	ND/0.012
	3/10/2005	ND	ND	ND	ND
SP-3	10/5/2004	ND	ND	ND	ND
	1/11/2005	0.010	ND	ND	ND
	1/20/2005	ND/ND	ND/ND	ND/ND	ND/0.037
	3/10/2005	ND	ND	ND	ND
SP-4	10/5/2004	ND	ND	ND	ND
	1/11/2005	ND	ND	0.092	ND
	1/20/2005	ND/ND	ND/ND	ND/ND	ND/ND
	3/10/2005	ND	ND	ND	ND
SP-6	10/5/2004	ND	ND	ND	ND
	1/11/2005	0.007	ND	ND	ND
	1/20/2005	ND/ND	ND/ND	ND/ND	ND/ND
	3/10/2005	ND	ND	ND	ND
SP-7	10/7/2004	ND	0.001	ND	ND
	1/11/2005	0.006	ND	0.032	ND
	1/20/2005	ND/ND	ND/ND	ND/ND	ND/ND
	3/10/2005	ND	ND	ND	ND
SP-8	10/4/2004	ND	ND	ND	ND
	1/14/2005	ND	ND	ND	ND
	3/10/2005	ND	ND	ND	ND
SP-9	10/4/2004	ND	ND	ND	ND
	1/14/2005	ND	ND	ND	ND
	3/10/2005	ND	ND	ND	ND
SP-10	10/4/2004	ND	ND	ND	ND
	1/14/2005	ND	ND	0.005	ND
	3/10/2005	0.005	ND	ND	ND

Notes:

- 1 CT. Water Quality Standards, December, 2002. Metals values are dissolved concentrations.
- 2 WQC-CMC/CCC Water Quality Criteria, Criterion Maximum Concentration (acute), Criterion Continuous Concentration USEPA, November 2002. Metals standards are dissolved concentrations. Value for aniline is a draft value.
- 3 ORNL SCV-Oak Ridge National Laboratory Secondary Chronic Values, (Suter & Tsao) June 1996
- 4 Suter, 1996, secondary chronic values.
- 5 USEPA Office of Water, Draft Ambient Aquatic Life Water Quality Criteria for Aniline, September, 1993
- 6 Shaded cell indicates exceedence of one or more water quality criteria

NE: Not Established
 ND: "Non-Detect" Results below laboratory analytical detection limits
 ND/0.012 - indicates results from two labs: York/ACT

**Table 2
Surface Water Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Surface Water Monitoring Location	Sample Collection Date	VOCs (mg/L)		SVOCs (mg/L)	
		Acetone	cis-1,2-Dichloroethylene	Aniline	Bis (2-ethylhexyl) phthalate

ND/0.012 - Indicates results from two labs: York/ACT

Bold Type: Indicates detection above laboratory analytical detection limits

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (µg/L)												
		1,1-Dichloroethane	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	1,2-Dichloroethane	Acetone	Benzene	2-Butanone (MEK)	Carbon Disulfide	cis-1,2-Dichloroethylene	Chlorobenzene	1,4-Dichlorobenzene	Diisobutylene	Ethylbenzene
SWPC		NE	NE	NE	2,970	NE	710	NE	NE	NE	42,000	26,000	NE	580,000
Res. Vol. Criteria		34,600	NE	NE	21	50,000	215	50,000	NE	NE	1,800	50,000	NE	50,000
Res. Vol. Criteria (Proposed)		3,000	360	280	7	50,000	130	50,000	NE	830	1,800	1,400	NE	2,700
I.C. Vol. Criteria		50,000	NE	NE	90	50,000	530	50,000	NE	NE	6,150	50,000	NE	50,000
I.C. Vol. Criteria (Proposed)		41,000	4,800	3,900	68	50,000	310	50,000	NE	11,000	23,000	3,400	NE	36,000
MW-01	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-03	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	2	ND	25	ND
MW-04	10/11/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-05	10/11/2004	ND	ND	23	ND	7	43	ND	ND	ND	8	ND	ND	150
MW-09	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-12	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-103	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-106	10/8/2004	ND	ND	7	ND	7	18	ND	ND	ND	17	ND	ND	7
MW-107	3/3/2004	ND	ND	ND	ND	13,000	ND	ND	ND	ND	ND	ND	ND	ND
	4/27/2004	ND	ND	ND	ND	ND	31	ND	ND	ND	ND	ND	ND	ND
	10/11/2004	ND	ND	ND	ND	200	28	ND	ND	ND	ND	ND	ND	ND
MW-108	10/8/2004	ND	3	7	ND	ND	41	ND	ND	ND	21	ND	ND	44
MW-109	10/8/2004	ND	ND	ND	ND	7	ND	ND	ND	ND	ND	ND	ND	ND
MW-111	10/8/2004	ND	27	20	ND	130	98	ND	ND	ND	ND	ND	ND	67
MW-112	3/3/2004	ND	2	15	ND	ND	49	ND	ND	ND	18	ND	ND	210
	4/27/2004	13	ND	ND	ND	ND	51	ND	ND	ND	23	ND	ND	250
	7/21/2004	ND	ND	ND	ND	ND	39	ND	ND	ND	ND	ND	ND	170
	10/8/2004	ND	ND	16	ND	ND	47	ND	ND	ND	23	ND	ND	190
	1/10/2005	ND	ND	11	1	13	41	ND	ND	ND	ND	ND	ND	220
MW-113	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-115	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (µg/L)												
		1,1-Dichloroethane	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	1,2-Dichloroethane	Acetone	Benzene	2-Butanone (MEK)	Carbon Disulfide	cis-1,2-Dichloroethylene	Chlorobenzene	1,4 Dichlorobenzene	Diisobutylene	Ethylbenzene
SWPC		NE	NE	NE	2,970	NE	710	NE	NE	NE	42,000	26,000	NE	580,000
Res. Vol. Criteria		34,600	NE	NE	21	50,000	215	50,000	NE	NE	1,800	50,000	NE	50,000
Res. Vol. Criteria (Proposed)		3,000	360	280	7	50,000	130	50,000	NE	830	1,800	1,400	NE	2,700
I.C. Vol. Criteria		50,000	NE	NE	90	50,000	530	50,000	NE	NE	6,150	50,000	NE	50,000
I.C. Vol. Criteria (Proposed)		41,000	4,800	3,900	68	50,000	310	50,000	NE	11,000	23,000	3,400	NE	36,000
MW-116	3/5/2004	ND	ND	ND	ND	1,800,000	380	ND	ND	ND	66	ND	ND	610
	4/29/2004	ND	11	80	480	460,000	ND	ND	ND	ND	170	ND	ND	1,700
	7/22/2004	ND	ND	54	ND	1,200,000	380	ND	ND	ND	97	ND	ND	1,200
	10/11/2004	ND	ND	ND	ND	750,000	320	630	ND	ND	ND	ND	ND	1,500
	1/10/2005	ND	ND	42	11	840,000	270	510	ND	ND	94	ND	ND	1,100
MW-121	4/28/2004	ND	ND	ND	ND	4,900	92	ND	ND	ND	ND	ND	ND	67
	7/22/2004	ND	ND	120	ND	1,000	51	ND	ND	ND	ND	ND	ND	120
	10/15/2004	ND	ND	79	ND	140	47	ND	ND	ND	ND	ND	ND	50
	1/11/2005	ND	ND	130	ND	2,200	68	ND	ND	ND	ND	ND	ND	83
MW-122	4/29/2004	ND	ND	ND	ND	160	ND	ND	ND	ND	ND	13	ND	16
	10/15/2004	ND	ND	ND	ND	6	2	ND	ND	ND	ND	ND	ND	ND

Table 1A
On-Site Groundwater Analytical Results

Crompton Manufacturing Company
Naugatuck, Connecticut

Monitoring Well	Sample Collection Date	VOCs (µg/L)												
		1,1-Dichloroethane	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	1,2-Dichloroethane	Acetone	Benzene	2-Butanone (MEK)	Carbon Disulfide	cis-1,2-Dichloroethylene	Chlorobenzene	1,4-Dichlorobenzene	Diisobutylene	Ethylbenzene
SWPC		NE	NE	NE	2,970	NE	710	NE	NE	NE	42,000	26,000	NE	580,000
Res. Vol. Criteria		34,600	NE	NE	21	50,000	215	50,000	NE	NE	1,800	50,000	NE	50,000
Res. Vol. Criteria (Proposed)		3,000	360	280	7	50,000	130	50,000	NE	830	1,800	1,400	NE	2,700
I.C. Vol. Criteria		50,000	NE	NE	90	50,000	530	50,000	NE	NE	6,150	50,000	NE	50,000
I.C. Vol. Criteria (Proposed)		41,000	4,800	3,900	68	50,000	310	50,000	NE	11,000	23,000	3,400	NE	36,000
MW-123	4/27/2004	ND	27	ND	ND	6,100	12	ND	ND	ND	ND	ND	ND	15
	10/15/2004	ND	ND	3,100	ND	17,000	ND	ND	ND	ND	ND	ND	ND	ND
MW-124	3/3/2004	ND	ND	ND	7	ND	9	ND	ND	ND	11	ND	ND	2
	4/28/2004	ND	ND	ND	ND	770	12	ND	ND	ND	14	ND	ND	ND
	10/8/2004	ND	ND	4	4	ND	14	ND	ND	ND	13	ND	ND	ND
MW-125	3/5/2004	ND	ND	2	ND	6	13	ND	ND	ND	ND	ND	ND	4
	4/28/2004	ND	ND	ND	ND	6,100	27	ND	ND	ND	ND	ND	ND	ND
	10/11/2004	ND	ND	ND	ND	220	10	ND	ND	ND	ND	ND	ND	ND
MW-127	10/13/2004	ND	ND	ND	ND	ND	280	ND	12,000	ND	ND	ND	ND	ND
MW-128	10/13/2004	ND	ND	ND	ND	ND	3	ND	ND	ND	ND	ND	ND	ND
MW-136	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-137	10/11/2004	ND	ND	ND	ND	200	ND	ND	ND	ND	ND	ND	ND	ND
MW-138	10/15/2004	ND	4	190	ND	14	2	ND	ND	ND	2	ND	ND	2
MW-141	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-142	3/5/2004	ND	ND	ND	ND	1,300,000	120	ND	ND	ND	ND	ND	ND	97
	4/27/2004	ND	15	ND	ND	600,000	140	ND	ND	ND	12	ND	ND	170
	7/22/2004	ND	ND	75	ND	1,400,000	120	ND	ND	ND	ND	ND	ND	190
	10/13/2004	ND	ND	ND	ND	800,000	110	600	ND	ND	ND	ND	ND	270
	1/10/2005	ND	ND	53	ND	470,000	170	470	ND	ND	ND	ND	ND	450
MW-143	3/5/2004	ND	ND	ND	ND	3,900	390	ND	ND	ND	ND	ND	ND	ND
	4/28/2004	ND	ND	ND	ND	4,200	430	ND	ND	ND	ND	ND	ND	ND

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (µg/L)												
		1,1-Dichloroethane	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	1,2-Dichloroethane	Acetone	Benzene	2-Butanone (MEK)	Carbon Disulfide	cis-1,2-Dichloroethylene	Chlorobenzene	1,4 Dichlorobenzene	Diisobutylene	Ethylbenzene
SWPC		NE	NE	NE	2,970	NE	710	NE	NE	NE	42,000	26,000	NE	580,000
Res. Vol. Criteria		34,600	NE	NE	21	50,000	215	50,000	NE	NE	1,800	50,000	NE	50,000
Res. Vol. Criteria (Proposed)		3,000	360	280	7	50,000	130	50,000	NE	830	1,800	1,400	NE	2,700
I.C. Vol. Criteria		50,000	NE	NE	90	50,000	530	50,000	NE	NE	6,150	50,000	NE	50,000
I.C. Vol. Criteria (Proposed)		41,000	4,800	3,900	68	50,000	310	50,000	NE	11,000	23,000	3,400	NE	36,000
MW-144	7/22/2004	ND	ND	62	ND	ND	490	ND	ND	ND	ND	ND	ND	ND
	10/13/2004	ND	ND	ND	ND	ND	400	ND	ND	ND	ND	ND	ND	ND
	1/11/2005	11	ND	49	ND	850	410	ND	ND	ND	ND	ND	ND	ND
	3/4/2004	ND	ND	ND	ND	12,000	ND	ND	ND	2	ND	ND	ND	ND
	4/28/2004	ND	1	ND	ND	8,900	3	ND	ND	ND	2	8	ND	ND
	7/21/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	10/13/2004	ND	ND	ND	ND	4,400	ND	ND	ND	ND	ND	ND	ND	ND
MW-145	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-146	10/13/2004	ND	ND	ND	ND	130	38	ND	ND	ND	3	ND	ND	7
MW-147	3/3/2004	ND	2	12	ND	17	100	ND	ND	ND	9	ND	ND	72
	4/29/2004	ND	ND	16	ND	550	120	ND	ND	ND	13	ND	ND	92
	7/21/2004	ND	ND	34	ND	ND	110	ND	ND	ND	13	ND	ND	120
	10/8/2004	ND	ND	ND	ND	12,000	ND	ND	ND	ND	ND	ND	ND	ND
	1/10/2005	ND	ND	31	ND	400	84	130	ND	ND	11	ND	ND	110

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (µg/L)												
		1,1-Dichloroethane	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	1,2-Dichloroethane	Acetone	Benzene	2-Butanone (MEK)	Carbon Disulfide	cis-1,2-Dichloroethylene	Chlorobenzene	1,4 Dichlorobenzene	Diisobutylene	Ethylbenzene
SWPC		NE	NE	NE	2,970	NE	710	NE	NE	NE	42,000	26,000	NE	580,000
Res. Vol. Criteria		34,600	NE	NE	21	50,000	215	50,000	NE	NE	1,800	50,000	NE	50,000
Res. Vol. Criteria (Proposed)		3,000	360	280	7	50,000	130	50,000	NE	830	1,800	1,400	NE	2,700
I.C. Vol. Criteria		50,000	NE	NE	90	50,000	530	50,000	NE	NE	6,150	50,000	NE	50,000
I.C. Vol. Criteria (Proposed)		41,000	4,800	3,900	68	50,000	310	50,000	NE	11,000	23,000	3,400	NE	36,000
MW-148	3/3/2004	ND	1	41	ND	740,000	120	ND	ND	ND	8	ND	ND	110
	4/28/2004	ND	ND	13	11	470,000	140	ND	ND	ND	13	ND	ND	120
	7/21/2004	ND	ND	73	ND	908,000	99	ND	ND	ND	ND	ND	ND	120
	10/8/2004	ND	ND	ND	ND	660,000	120	940	ND	ND	ND	ND	ND	150
	1/10/2005	ND	ND	ND	ND	530,000	ND	ND	ND	ND	ND	ND	ND	ND
MW-150	3/5/2004	ND	ND	ND	ND	790,000	160	ND	ND	ND	7	ND	ND	19
	10/11/2004	ND	ND	ND	ND	150,000	ND	ND	ND	ND	ND	ND	ND	ND
MW-152	10/15/2004	ND	ND	2	ND	310	6	ND	ND	ND	ND	ND	ND	ND
MW-153	10/13/2004	ND	ND	ND	ND	ND	6	ND	ND	ND	ND	ND	ND	ND
MW-157	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-162	4/28/2004	ND	ND	14	ND	ND	83	ND	ND	ND	ND	ND	ND	400
	10/15/2004	ND	ND	120	ND	ND	ND	ND	ND	ND	ND	ND	ND	890
MW-163	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	4,900
MW-164	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3,600
MW-167	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-168	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-169	4/28/2004	ND	ND	14	ND	620,000	150	ND	ND	ND	14	ND	ND	190
	7/22/2004	ND	ND	84	ND	1,300,000	130	ND	ND	ND	ND	ND	ND	200
	10/8/2004	ND	ND	ND	ND	1,100,000	130	1,000	ND	ND	ND	ND	ND	220
	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	1/10/2005	ND	ND	57	ND	1,000,000	110	500	ND	ND	ND	ND	ND	190

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (µg/L)												
		1,1-Dichloroethane	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	1,2-Dichloroethane	Acetone	Benzene	2-Butanone (MEK)	Carbon Disulfide	cis-1,2-Dichloroethylene	Chlorobenzene	1,4 Dichlorobenzene	Diisobutylene	Ethylbenzene
SWPC		NE	NE	NE	2,970	NE	710	NE	NE	NE	42,000	26,000	NE	580,000
Res. Vol. Criteria		34,600	NE	NE	21	50,000	215	50,000	NE	NE	1,800	50,000	NE	50,000
Res. Vol. Criteria (Proposed)		3,000	360	280	7	50,000	130	50,000	NE	830	1,800	1,400	NE	2,700
I.C. Vol. Criteria		50,000	NE	NE	90	50,000	530	50,000	NE	NE	6,150	50,000	NE	50,000
I.C. Vol. Criteria (Proposed)		41,000	4,800	3,900	68	50,000	310	50,000	NE	11,000	23,000	3,400	NE	36,000
MW-170	4/27/2004	17	23	ND	ND	2,400	ND	ND	ND	ND	ND	ND	ND	ND
	10/13/2004	ND	ND	ND	ND	520	ND	ND	ND	ND	ND	ND	ND	ND
MW-173	1/14/2005	ND	ND	490	ND	ND	350	ND	ND	ND	ND	ND	ND	ND

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	1,2-Dichloroethane	Isopropylbenzene	Methyl ethyl ketone (2-Butanone)	Methyl isobutylketone	n-Butylbenzene	Nonene	n-Propylbenzene	o-Xylene
SWPC		2,970	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria		21	NE	NE	50,000	NE	NE	NE	21,300
Res. Vol. Criteria (Proposed)		7	2,800	NE	13,000	NE	NE	NE	8,700
I.C. Vol. Criteria		90	NE	NE	50,000	NE	NE	NE	50,000
I.C. Vol. Criteria (Proposed)		68	6,800	NE	50,000	NE	NE	NE	48,000
MW-01	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-03	10/13/2004	4	ND	ND	ND	ND	ND	ND	ND
MW-04	10/11/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-05	10/11/2004	ND	ND	ND	ND	ND	ND	4	120
MW-09	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-12	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-103	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-106	10/8/2004	ND	ND	ND	ND	ND	ND	2	14
MW-107	3/3/2004	ND	ND	ND	ND	ND	ND	ND	390
	4/27/2004	ND	ND	ND	ND	ND	ND	ND	66
	10/11/2004	ND	ND	ND	ND	ND	ND	ND	160
MW-108	10/8/2004	ND	ND	ND	ND	ND	ND	3	37
MW-109	10/8/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-111	10/8/2004	ND	ND	ND	ND	ND	ND	ND	420
MW-112	3/3/2004	ND	13	ND	ND	ND	ND	4	590
	4/27/2004	ND	ND	ND	ND	ND	ND	ND	ND
	7/21/2004	ND	ND	ND	ND	ND	ND	ND	340
	10/8/2004	ND	ND	ND	ND	ND	ND	ND	490
	1/10/2005	ND	21	ND	ND	ND	ND	10	370
MW-113	10/13/2004	3	ND	ND	ND	ND	ND	ND	ND
MW-115	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	1,2-Dichloroethane	Isopropylbenzene	Methyl ethyl ketone (2-Butanone)	Methyl isobutylketone	n-Butylbenzene	Nonene	n-Propylbenzene	o-Xylene
SWPC		2,970	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria		21	NE	NE	50,000	NE	NE	NE	21,300
Res. Vol. Criteria (Proposed)		7	2,800	NE	13,000	NE	NE	NE	8,700
I.C. Vol. Criteria		90	NE	NE	50,000	NE	NE	NE	50,000
I.C. Vol. Criteria (Proposed)		68	6,800	NE	50,000	NE	NE	NE	48,000
MW-116	3/5/2004	ND	ND	ND	2,100	ND	ND	ND	240
	4/29/2004	ND	ND	620	1,600	ND	ND	ND	ND
	7/22/2004	ND	56	670	2,400	ND	ND	ND	450
	10/11/2004	ND	ND	1,700	ND	ND	ND	ND	440
	1/10/2005	ND	51	ND	ND	19	ND	710	ND
MW-121	4/28/2004	ND	ND	ND	560	ND	ND	13	ND
	7/22/2004	ND	ND	ND	ND	ND	ND	ND	1,100
	10/15/2004	ND	ND	ND	140	ND	ND	ND	1,500
	1/11/2005	ND	ND	ND	ND	ND	ND	1,700	ND
MW-122	4/29/2004	ND	ND	ND	ND	ND	ND	ND	ND
	10/15/2004	ND	ND	ND	ND	ND	ND	ND	19

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	1,2-Dichloroethane	Isopropylbenzene	Methyl ethyl ketone (2-Butanone)	Methyl isobutylketone	n-Butylbenzene	Nonene	n-Propylbenzene	o-Xylene
SWPC		2,970	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria		21	NE	NE	50,000	NE	NE	NE	21,300
Res. Vol. Criteria (Proposed)		7	2,800	NE	13,000	NE	NE	NE	8,700
I.C. Vol. Criteria		90	NE	NE	50,000	NE	NE	NE	50,000
I.C. Vol. Criteria (Proposed)		68	6,800	NE	50,000	NE	NE	NE	48,000
MW-123	4/27/2004	ND	17	ND	110	ND	ND	260	ND
	10/15/2004	ND	55	ND	ND	ND	ND	230	2,000
MW-124	3/3/2004	ND	2	ND	ND	ND	ND	ND	ND
	4/28/2004	ND	ND	ND	ND	ND	ND	ND	ND
	10/8/2004	ND	ND	ND	ND	ND	ND	ND	2
MW-125	3/5/2004	ND	2	ND	ND	ND	ND	ND	64
	4/28/2004	ND	ND	ND	100	ND	ND	ND	ND
	10/11/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-127	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-128	10/13/2004	8	ND	ND	ND	ND	ND	ND	ND
MW-136	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-137	10/11/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-138	10/15/2004	ND	35	ND	51	ND	ND	ND	95
MW-141	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-142	3/5/2004	ND	ND	ND	4,500	ND	ND	ND	4,000
	4/27/2004	ND	ND	740	4,300	ND	ND	ND	ND
	7/22/2004	ND	ND	850	4,000	ND	ND	ND	3,400
	10/13/2004	ND	ND	ND	3,200	ND	ND	ND	2,200
	1/10/2005	ND	ND	ND	ND	ND	ND	1,400	ND
MW-143	3/5/2004	ND	ND	ND	600	ND	ND	ND	1,900
	4/28/2004	ND	ND	150	2,400	ND	ND	ND	ND

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	1,2-Dichloroethane	Isopropylbenzene	Methyl ethyl ketone (2-Butanone)	Methyl isobutylketone	n-Butylbenzene	Nonene	n-Propylbenzene	o-Xylene
SWPC		2,970	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria		21	NE	NE	50,000	NE	NE	NE	21,300
Res. Vol. Criteria (Proposed)		7	2,800	NE	13,000	NE	NE	NE	8,700
I.C. Vol. Criteria		90	NE	NE	50,000	NE	NE	NE	50,000
I.C. Vol. Criteria (Proposed)		68	6,800	NE	50,000	NE	NE	NE	48,000
	7/22/2004	ND	ND	ND	1,000	ND	ND	ND	2,900
	10/13/2004	ND	ND	ND	660	ND	ND	ND	3,400
	1/11/2005	ND	ND	ND	ND	ND	ND	2,300	ND
MW-144	3/4/2004	ND	ND	ND	ND	ND	ND	ND	ND
	4/28/2004	ND	ND	ND	ND	ND	ND	ND	ND
	7/21/2004	ND	ND	ND	ND	ND	ND	ND	3
	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND
	1/14/2005	ND	ND	ND	ND	ND	ND	ND	ND
MW-145	10/13/2004	ND	ND	ND	ND	ND	ND	ND	2
MW-146	10/13/2004	ND	2	ND	ND	ND	ND	ND	10
MW-147	3/3/2004	ND	9	ND	310	ND	ND	1	790
	4/29/2004	ND	ND	ND	350	ND	ND	ND	ND
	7/21/2004	ND	25	ND	360	ND	ND	ND	1,050
	10/8/2004	ND	ND	ND	910	ND	ND	ND	1,300
	1/10/2005	ND	12	130	ND	ND	ND	1,900	ND

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	1,2-Dichloroethane	Isopropylbenzene	Methyl ethyl ketone (2-Butanone)	Methyl isobutylketone	n-Butylbenzene	Nonene	n-Propylbenzene	o-Xylene
SWPC		2,970	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria		21	NE	NE	50,000	NE	NE	NE	21,300
Res. Vol. Criteria (Proposed)		7	2,800	NE	13,000	NE	NE	NE	8,700
I.C. Vol. Criteria		90	NE	NE	50,000	NE	NE	NE	50,000
I.C. Vol. Criteria (Proposed)		68	6,800	NE	50,000	NE	NE	NE	48,000
MW-148	3/3/2004	ND	7	ND	2,500	ND	ND	1	3,600
	4/28/2004	ND	ND	650	2,600	ND	ND	ND	ND
	7/21/2004	ND	ND	ND	3,500	ND	ND	ND	4,200
	10/8/2004	ND	ND	ND	4,100	ND	ND	ND	4,100
	1/10/2005	ND	ND	ND	ND	ND	ND	2,600	ND
MW-150	3/5/2004	3	ND	ND	5	ND	ND	ND	3
	10/11/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-152	10/15/2004	ND	ND	ND	ND	ND	ND	ND	2
MW-153	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-157	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-162	4/28/2004	ND	ND	ND	ND	ND	ND	16	ND
	10/15/2004	ND	ND	ND	ND	ND	ND	ND	120
MW-163	10/13/2004	ND	54	ND	ND	ND	ND	ND	1,400
MW-164	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-167	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-168	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND
MW-169	4/28/2004	ND	ND	790	4,900	ND	ND	ND	ND
	7/22/2004	ND	ND	890	5,100	ND	ND	ND	2,000
	10/8/2004	ND	ND	ND	5,600	ND	ND	ND	740
	10/15/2004	ND	54	ND	ND	ND	ND	ND	1,400
	1/10/2005	ND	ND	500	ND	ND	ND	620	ND

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	1,2-Dichloroethane	Isopropylbenzene	Methyl ethyl ketone (2-Butanone)	Methyl isobutylketone	n-Butylbenzene	Nonene	n-Propylbenzene	o-Xylene
SWPC		2,970	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria		21	NE	NE	50,000	NE	NE	NE	21,300
Res. Vol. Criteria (Proposed)		7	2,800	NE	13,000	NE	NE	NE	8,700
I.C. Vol. Criteria		90	NE	NE	50,000	NE	NE	NE	50,000
I.C. Vol. Criteria (Proposed)		68	6,800	NE	50,000	NE	NE	NE	48,000
MW-170	4/27/2004	ND	16	ND	200	ND	ND	43	ND
	10/13/2004	ND	ND	ND	ND	ND	ND	ND	68
MW-173	1/14/2005	ND	43	ND	ND	ND	ND	38	1,100

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (ug/L) (cont.)						SVOCs (ug/L)				Total Met		
		sec-Butylbenzene	Toluene	1,2,4-Trichlorobenzene	Trichloroethylene	Vinyl Chloride	Xylenes (total)	Aniline	bis(2-Ethylhexyl)phthalate	Nitrobenzene	n-Nitrosodiphenylamine	Arsenic	Barium	Cadmium
SWPC		NE	4,000,000	NE	2,340	15,750	NE	NE	NE	NE	NE	0.004	NE	0.006
Res. Vol. Criteria		NE	23,500	NE	219	2	21,300	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		1,500	7,100	NE	27	2	8,700	NE	NE	NE	NE	NE	NE	NE
I.C. Vol. Criteria		NE	50,000	NE	540	2	50,000	NE	NE	NE	NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		20,000	41,000	NE	67	52	48,000	NE	NE	NE	NE	NE	NE	NE
MW-01	10/13/2004	ND	ND	ND	ND	ND	ND	26	ND	ND	ND	ND	ND	ND
MW-03	10/13/2004	ND	ND	ND	ND	ND	ND	310	ND	ND	ND	0.011	0.014	0.658
MW-04	10/11/2004	ND	ND	ND	ND	ND	ND	150	ND	ND	ND	ND	0.025	ND
MW-05	10/11/2004	ND	18	3	ND	ND	260	23,000	ND	ND	ND	0.009	0.272	ND
MW-09	10/15/2004	ND	ND	ND	ND	ND	ND	64	ND	ND	ND	ND	0.044	ND
MW-12	10/15/2004	ND	ND	ND	ND	ND	ND	64	ND	ND	ND	ND	0.023	ND
MW-103	10/15/2004	ND	ND	ND	ND	ND	ND	13	ND	ND	ND	ND	0.023	ND
MW-106	10/8/2004	ND	1	ND	ND	ND	18	ND	ND	ND	830	ND	0.013	ND
MW-107	3/3/2004	ND	ND	ND	ND	ND	ND	140,000	ND	ND	ND	ND	ND	ND
	4/27/2004	ND	ND	ND	ND	ND	ND	22,000	ND	ND	ND	ND	ND	ND
	10/11/2004	ND	ND	ND	ND	ND	160	36,000	ND	ND	ND	ND	0.288	ND
MW-108	10/8/2004	ND	14	ND	ND	ND	62	ND	ND	ND	2,300	ND	0.034	ND
MW-109	10/8/2004	ND	ND	ND	ND	ND	ND	2,100	ND	ND	2,900	ND	0.087	ND
MW-111	10/8/2004	ND	390	ND	ND	ND	430	90,000	ND	ND	ND	ND	0.302	ND
MW-112	3/3/2004	ND	260	ND	ND	ND	807	94,000	ND	ND	8,200	ND	ND	ND
	4/27/2004	26	210	ND	ND	10	1,010	66,000	ND	ND	ND	ND	ND	ND
	7/21/2004	ND	130	ND	ND	ND	435	92,000	ND	ND	ND	ND	ND	ND
	10/8/2004	ND	170	ND	ND	ND	650	65,000	ND	ND	ND	ND	0.401	ND
	1/10/2005	ND	84	3	ND	ND	520	49,000	ND	ND	ND	NA	NA	NA
MW-113	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.049	ND
MW-115	10/13/2004	ND	ND	ND	1	ND	ND	ND	43	ND	17	ND	0.009	ND

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (ug/L) (cont.)						SVOCs (ug/L)				Total Metals		
		sec-Butylbenzene	Toluene	1,2,4-Trichlorobenzene	Trichloroethylene	Vinyl Chloride	Xylenes (total)	Aniline	bis(2-Ethylhexyl)phthalate	Nitrobenzene	n-Nitrosodiphenylamine	Arsenic	Barium	Cadmium
SWPC		NE	4,000,000	NE	2,340	15,750	NE	NE	NE	NE	NE	0.004	NE	0.006
Res. Vol. Criteria		NE	23,500	NE	219	2	21,300	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		1,500	7,100	NE	27	2	8,700	NE	NE	NE	NE	NE	NE	NE
L.C. Vol. Criteria		NE	50,000	NE	540	2	50,000	NE	NE	NE	NE	NE	NE	NE
L.C. Vol. Criteria (Proposed)		20,000	41,000	NE	67	52	48,000	NE	NE	NE	NE	NE	NE	NE
MW-116	3/5/2004	ND	2,100	ND	ND	ND	769	160,000	ND	ND	ND	ND	ND	ND
	4/29/2004	54	ND	ND	ND	ND	3,400	440,000	ND	ND	ND	ND	ND	ND
	7/22/2004	ND	1,500	ND	ND	ND	1,400	350,000	ND	ND	ND	ND	ND	ND
	10/11/2004	ND	1,400	ND	ND	ND	1,540	320,000	ND	ND	ND	0.011	0.1	ND
	1/10/2005	120	ND	ND	ND	940	230,000	ND	ND	ND	ND	NA	NA	NA
MW-121	4/28/2004	130	70	ND	ND	ND	6,700	680,000	ND	ND	ND	ND	ND	ND
	7/22/2004	ND	68	ND	ND	ND	1,278	130,000	ND	ND	ND	ND	ND	ND
	10/15/2004	ND	48	ND	ND	ND	1,620	220,000	ND	ND	ND	ND	0.164	ND
	1/11/2005	61	ND	ND	ND	1,900	170,000	ND	ND	ND	ND	NA	NA	NA
MW-122	4/29/2004	ND	260	ND	ND	ND	64	1,500	ND	ND	ND	ND	ND	ND
	10/15/2004	ND	4	ND	ND	ND	20	530	ND	ND	ND	ND	0.01	ND

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (ug/L) (cont.)						SVOCs (ug/L)				Total Met		
		sec-Butylbenzene	Toluene	1,2,4-Trichlorobenzene	Trichloroethylene	Vinyl Chloride	Xylenes (total)	Aniline	bis(2-Ethylhexyl)phthalate	Nitrobenzene	n-Nitrosodiphenylamine	Arsenic	Barium	Cadmium
SWPC		NE	4,000,000	NE	2,340	15,750	NE	NE	NE	NE	NE	0.004	NE	0.006
Res. Vol. Criteria		NE	23,500	NE	219	2	21,300	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		1,500	7,100	NE	27	2	8,700	NE	NE	NE	NE	NE	NE	NE
I.C. Vol. Criteria		NE	50,000	NE	540	2	50,000	NE	NE	NE	NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		20,000	41,000	NE	67	52	48,000	NE	NE	NE	NE	NE	NE	NE
MW-123	4/27/2004	2,600	120	ND	ND	ND	2,000	17,000	ND	ND	17,000	ND	ND	ND
	10/15/2004	ND	280	ND	ND	ND	2,000	26,000	ND	ND	19,000	ND	0.012	ND
MW-124	3/3/2004	ND	2	ND	ND	ND	ND	770	ND	ND	ND	ND	ND	ND
	4/28/2004	23	ND	ND	ND	ND	ND	88	ND	ND	43	ND	ND	ND
	10/8/2004	ND	1	ND	ND	ND	2	630	ND	ND	ND	ND	0.085	ND
MW-125	3/5/2004	ND	3	ND	ND	ND	69	6,100	ND	ND	ND	ND	ND	ND
	4/28/2004	ND	11	ND	ND	ND	130	2,500	ND	ND	590	ND	ND	ND
	10/11/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	1,500	ND	0.007	ND
MW-127	10/13/2004	ND	ND	ND	ND	ND	ND	8,500	ND	2,800	ND	ND	0.023	ND
MW-128	10/13/2004	ND	ND	ND	1	ND	ND	ND	ND	ND	ND	ND	0.016	ND
MW-136	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.045	ND
MW-137	10/11/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.56	ND
MW-138	10/15/2004	ND	4	ND	ND	ND	100	ND	ND	ND	5,500	ND	0.138	ND
MW-141	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	27	ND	0.03	ND
MW-142	3/5/2004	ND	520	ND	ND	ND	4,129	400,000	ND	ND	ND	ND	ND	ND
	4/27/2004	68	630	ND	ND	ND	5,090	590,000	ND	ND	ND	ND	ND	ND
	7/22/2004	ND	370	ND	ND	ND	3,700	560,000	ND	ND	ND	ND	ND	ND
	10/13/2004	ND	2,700	ND	ND	ND	2,550	630,000	ND	ND	ND	0.026	2.38	ND
	1/10/2005	1,800	ND	ND	ND	1,800	460,000	ND	ND	ND	ND	NA	NA	NA
MW-143	3/5/2004	ND	ND	ND	ND	ND	1,900	270,000	ND	ND	ND	ND	ND	ND
	4/28/2004	50	21	ND	ND	3,100	ND	520,000	ND	ND	ND	ND	ND	ND

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (ug/L) (cont.)						SVOCs (ug/L)				Total Met		
		sec-Butylbenzene	Toluene	1,2,4-Trichlorobenzene	Trichloroethylene	Vinyl Chloride	Xylenes (total)	Aniline	bis(2-Ethylhexyl)phthalate	Nitrobenzene	n-Nitrosodiphenylamine	Arsenic	Barium	Cadmium
SWPC		NE	4,000,000	NE	2,340	15,750	NE	NE	NE	NE	NE	0.004	NE	0.006
Res. Vol. Criteria		NE	23,500	NE	219	2	21,300	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		1,500	7,100	NE	27	2	8,700	NE	NE	NE	NE	NE	NE	NE
I.C. Vol. Criteria		NE	50,000	NE	540	2	50,000	NE	NE	NE	NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		20,000	41,000	NE	67	52	48,000	NE	NE	NE	NE	NE	NE	NE
	7/22/2004	ND	29	ND	ND	ND	2,900	490,000	ND	ND	ND	ND	ND	ND
	10/13/2004	ND	ND	ND	ND	ND	3,400	590,000	ND	ND	ND	0.014	2.09	ND
	1/11/2005	29	ND	ND	ND	2,400	400,000	ND	ND	ND	ND	NA	NA	NA
MW-144	3/4/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	4/28/2004	ND	4	ND	ND	ND	26	160	ND	ND	ND	ND	ND	ND
	7/21/2004	ND	ND	ND	ND	ND	3	880	ND	ND	ND	ND	ND	ND
	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.091	ND
	1/14/2005	ND	ND	ND	ND	ND	11	ND	ND	ND	ND	NA	NA	NA
MW-145	10/13/2004	ND	3	ND	ND	ND	5	21	ND	ND	42	ND	0.044	ND
MW-146	10/13/2004	ND	3	ND	ND	ND	17	89	ND	ND	ND	ND	0.023	ND
MW-147	3/3/2004	ND	240	ND	ND	ND	858	310,000	ND	ND	ND	ND	ND	ND
	4/29/2004	23	340	ND	ND	ND	2,100	480,000	ND	ND	ND	ND	ND	ND
	7/21/2004	ND	370	ND	ND	ND	1,200	250,000	ND	ND	ND	ND	ND	ND
	10/8/2004	ND	340	ND	ND	ND	1,440	540,000	ND	ND	ND	0.007	2.7	ND
	1/10/2005	480	ND	ND	ND	2,060	520,000	ND	ND	ND	ND	NA	NA	NA

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (ug/L) (cont.)						SVOCs (ug/L)				Total Met		
		sec-Butylbenzene	Toluene	1,2,4-Trichlorobenzene	Trichloroethylene	Vinyl Chloride	Xylenes (total)	Aniline	bis(2-Ethylhexyl)phthalate	Nitrobenzene	n-Nitrosodiphenylamine	Arsenic	Barium	Cadmium
SWPC		NE	4,000,000	NE	2,340	15,750	NE	NE	NE	NE	NE	0.004	NE	0.006
Res. Vol. Criteria		NE	23,500	NE	219	2	21,300	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		1,500	7,100	NE	27	2	8,700	NE	NE	NE	NE	NE	NE	NE
I.C. Vol. Criteria		NE	50,000	NE	540	2	50,000	NE	NE	NE	NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		20,000	41,000	NE	67	52	48,000	NE	NE	NE	NE	NE	NE	NE
MW-148	3/3/2004	ND	540	ND	ND	ND	3,846	550,000	ND	ND	ND	ND	ND	ND
	4/28/2004	69	340	ND	ND	ND	3,200	340,000	ND	ND	ND	ND	ND	ND
	7/21/2004	ND	420	ND	ND	ND	4,400	540,000	ND	ND	ND	ND	ND	ND
	10/8/2004	ND	440	ND	ND	ND	4,100	560,000	ND	ND	ND	ND	1.76	ND
	1/10/2005	260	ND	ND	ND	2,600	460,000	ND	ND	ND	ND	NA	NA	NA
MW-150	3/5/2004	ND	340	ND	ND	ND	8	170	ND	ND	ND	ND	ND	ND
	10/11/2004	ND	ND	ND	ND	ND	ND	350	ND	ND	51	ND	0.05	ND
MW-152	10/15/2004	ND	1	ND	ND	ND	ND	810	ND	ND	ND	0.007	0.020	ND
MW-153	10/13/2004	ND	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.014	ND
MW-157	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.037	ND
MW-162	4/28/2004	130	78	ND	ND	ND	3,200	290,000	ND	ND	ND	ND	ND	ND
	10/15/2004	ND	76	ND	ND	ND	3,520	71,000	ND	ND	ND	ND	0.025	ND
MW-163	10/13/2004	ND	240	ND	ND	ND	25,400	68	ND	ND	200	ND	0.075	ND
MW-164	10/15/2004	ND	ND	ND	ND	ND	11,000	650	ND	ND	2,200	ND	0.026	ND
MW-167	10/15/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	ND	0.048	ND
MW-168	10/13/2004	ND	ND	ND	ND	ND	ND	23	ND	ND	ND	ND	0.049	0.061
MW-169	4/28/2004	73	270	ND	ND	ND	ND	770,000	ND	ND	ND	ND	ND	ND
	7/22/2004	ND	ND	ND	ND	ND	2,300	830,000	ND	ND	ND	ND	ND	ND
	10/8/2004	ND	140	ND	ND	ND	1,060	520,000	ND	ND	ND	ND	1.45	ND
	10/15/2004	ND	240	ND	ND	ND	254,000	68	ND	ND	200	ND	0.075	ND
	1/10/2005	90	ND	ND	ND	890	470,000	ND	ND	ND	ND	NA	NA	NA

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	VOCs (ug/L) (cont.)						SVOCs (ug/L)				Total Met		
		sec-Butylbenzene	Toluene	1,2,4-Trichlorobenzene	Trichloroethylene	Vinyl Chloride	Xylenes (total)	Aniline	bis(2-Ethylhexyl)phthalate	Nitrobenzene	n-Nitrosodiphenylamine	Arsenic	Barium	Cadmium
SWPC		NE	4,000,000	NE	2,340	15,750	NE	NE	NE	NE	NE	0.004	NE	0.006
Res. Vol. Criteria		NE	23,500	NE	219	2	21,300	NE	NE	NE	NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		1,500	7,100	NE	27	2	8,700	NE	NE	NE	NE	NE	NE	NE
I.C. Vol. Criteria		NE	50,000	NE	540	2	50,000	NE	NE	NE	NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		20,000	41,000	NE	67	52	48,000	NE	NE	NE	NE	NE	NE	NE
MW-170	4/27/2004	430	ND	ND	ND	ND	83	340	ND	ND	4,900	ND	ND	ND
	10/13/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND	9,800	ND	0.043	ND
MW-173	1/14/2005	ND	70	ND	ND	ND	1,100	60,000	ND	ND	ND	NA	NA	NA

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	als (mg/L)			Total PCBs (mg/L)
		Chromium	Lead	Selenium	Total PCBs
SWPC		0.110	0.013	0.05	1
Res. Vol. Criteria		NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		NE	NE	NE	NE
I.C. Vol. Criteria		NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		NE	NE	NE	NE
MW-01	10/13/2004	ND	ND	ND	NA
MW-03	10/13/2004	ND	0.047	ND	NA
MW-04	10/11/2004	ND	ND	ND	NA
MW-05	10/11/2004	ND	ND	ND	NA
MW-09	10/15/2004	ND	ND	ND	NA
MW-12	10/15/2004	ND	ND	ND	NA
MW-103	10/15/2004	ND	ND	ND	NA
MW-106	10/8/2004	ND	ND	ND	NA
MW-107	3/3/2004	ND	ND	ND	NA
	4/27/2004	ND	ND	ND	NA
	10/11/2004	ND	0.007	ND	NA
MW-108	10/8/2004	ND	0.004	ND	NA
MW-109	10/8/2004	ND	0.004	ND	NA
MW-111	10/8/2004	ND	ND	ND	NA
MW-112	3/3/2004	ND	ND	ND	NA
	4/27/2004	ND	ND	ND	NA
	7/21/2004	ND	ND	ND	NA
	10/8/2004	ND	0.006	ND	NA
	1/10/2005	NA	NA	NA	NA
MW-113	10/13/2004	0.066	ND	ND	NA
MW-115	10/13/2004	ND	ND	ND	NA

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	als (mg/L)			Total PCBs (mg/L)
		Chromium	Lead	Selenium	Total PCBs
SWPC		0.110	0.013	0.05	1
Res. Vol. Criteria		NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		NE	NE	NE	NE
I.C. Vol. Criteria		NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		NE	NE	NE	NE
MW-116	3/5/2004	ND	ND	ND	NA
	4/29/2004	ND	ND	ND	NA
	7/22/2004	ND	ND	ND	NA
	10/11/2004	0.015	0.009	ND	NA
	1/10/2005	NA	NA	NA	NA
MW-121	4/28/2004	ND	ND	ND	NA
	7/22/2004	ND	ND	ND	NA
	10/15/2004	ND	ND	ND	NA
	1/11/2005	NA	NA	NA	NA
MW-122	4/29/2004	ND	ND	ND	NA
	10/15/2004	ND	ND	ND	NA

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	als (mg/L)			Total PCBs (mg/L)
		Chromium	Lead	Selenium	Total PCBs
SWPC		0.110	0.013	0.05	1
Res. Vol. Criteria		NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		NE	NE	NE	NE
I.C. Vol. Criteria		NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		NE	NE	NE	NE
MW-123	4/27/2004	ND	ND	ND	NA
	10/15/2004	0.009	ND	ND	NA
MW-124	3/3/2004	ND	ND	ND	NA
	4/28/2004	ND	ND	ND	NA
	10/8/2004	0.01	0.008	ND	NA
MW-125	3/5/2004	ND	ND	ND	NA
	4/28/2004	ND	ND	ND	NA
	10/11/2004	ND	ND	ND	NA
MW-127	10/13/2004	ND	ND	ND	NA
MW-128	10/13/2004	ND	ND	ND	NA
MW-136	10/15/2004	ND	0.007	ND	NA
MW-137	10/11/2004	ND	ND	ND	NA
MW-138	10/15/2004	ND	ND	ND	NA
MW-141	10/15/2004	ND	ND	ND	NA
MW-142	3/5/2004	ND	ND	ND	NA
	4/27/2004	ND	ND	ND	NA
	7/22/2004	ND	ND	ND	NA
	10/13/2004	0.009	0.003	0.072	NA
	1/10/2005	NA	NA	NA	NA
MW-143	3/5/2004	ND	ND	ND	NA
	4/28/2004	ND	ND	ND	NA

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	als (mg/L)			Total PCBs (mg/L)
		Chromium	Lead	Selenium	Total PCBs
SWPC		0.110	0.013	0.05	1
Res. Vol. Criteria		NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		NE	NE	NE	NE
I.C. Vol. Criteria		NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		NE	NE	NE	NE
	7/22/2004	ND	ND	ND	NA
	10/13/2004	0.006	0.008	0.063	NA
	1/11/2005	NA	NA	NA	NA
MW-144	3/4/2004	ND	ND	ND	NA
	4/28/2004	ND	ND	ND	NA
	7/21/2004	ND	ND	ND	NA
	10/13/2004	ND	ND	ND	NA
	1/14/2005	NA	NA	NA	NA
	10/13/2004	ND	ND	ND	NA
MW-145	10/13/2004	ND	ND	ND	NA
MW-146	10/13/2004	0.028	0.014	0.105	NA
MW-147	3/3/2004	ND	ND	ND	NA
	4/29/2004	ND	ND	ND	NA
	7/21/2004	ND	ND	ND	NA
	10/8/2004	0.012	0.006	ND	NA
	1/10/2005	NA	NA	NA	NA

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	als (mg/L)			Total PCBs (mg/L)
		Chromium	Lead	Selenium	Total PCBs
SWPC		0.110	0.013	0.05	1
Res. Vol. Criteria		NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		NE	NE	NE	NE
I.C. Vol. Criteria		NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		NE	NE	NE	NE
MW-148	3/3/2004	ND	ND	ND	NA
	4/28/2004	ND	ND	ND	NA
	7/21/2004	ND	ND	ND	NA
	10/8/2004	0.01	0.004	ND	NA
	1/10/2005	NA	NA	NA	NA
MW-150	3/5/2004	ND	ND	ND	NA
	10/11/2004	0.005	ND	ND	NA
MW-152	10/15/2004	ND	ND	ND	NA
MW-153	10/13/2004	ND	0.006	ND	NA
MW-157	10/15/2004	ND	ND	ND	NA
MW-162	4/28/2004	ND	ND	ND	NA
	10/15/2004	ND	ND	ND	NA
MW-163	10/13/2004	ND	0.012	ND	ND
MW-164	10/15/2004	ND	ND	ND	NA
MW-167	10/15/2004	ND	0.007	ND	NA
MW-168	10/13/2004	ND	ND	ND	NA
MW-169	4/28/2004	ND	ND	ND	NA
	7/22/2004	ND	ND	ND	NA
	10/8/2004	0.007	ND	ND	NA
	10/15/2004	ND	0.012	ND	NA
	1/10/2005	NA	NA	NA	NA

**Table 1A
On-Site Groundwater Analytical Results**

**Crompton Manufacturing Company
Naugatuck, Connecticut**

Monitoring Well	Sample Collection Date	als (mg/L)			Total PCBs (mg/L)
		Chromium	Lead	Selenium	Total PCBs
SWPC		0.110	0.013	0.05	1
Res. Vol. Criteria		NE	NE	NE	NE
Res. Vol. Criteria (Proposed)		NE	NE	NE	NE
I.C. Vol. Criteria		NE	NE	NE	NE
I.C. Vol. Criteria (Proposed)		NE	NE	NE	NE
MW-170	4/27/2004	ND	ND	ND	NA
	10/13/2004	ND	ND	ND	NA
MW-173	1/14/2005	NA	NA	NA	NA