OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

January 9, 2007

RE: HUKILL CHEMICAL CORPORATION
TSD/LQG/TRANSPORTER
OHD001926740/02-18-0315
CUYAHOGA
NOTICE OF VIOLATION

Mr. Tim Jones
EH&S Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, OH 44146

Dear Mr. Jones:

On December 18, 2006, the Ohio Environmental Protection Agency, represented by Rich Kurlich from the Division of Drinking and Groundwater (DDAGW), conducted a ground water field inspection at Hukill Chemical Corporation. The purpose of his inspection was to evaluate the on-going ground water monitoring program. The inspection evaluated both the facility's sampling procedures and the condition of the monitoring wells.

I have enclosed copies of the groundwater inspection checklists for your records. The following two violations were noted during the field inspection.

1. OAC Rule 3745-54-97 (D): The ground water monitoring program must include consistent sampling and analysis procedures. DDAGW has interpreted this rule citation to include the presence of visible well identification numbers such that the same borehole can be consistently sampled. During the field inspection, it was noted that most monitoring wells do not have any identification number visible on the outer casing. The facility should install permanent well identification numbers on each well head.

   To return to compliance with the rule, please submit photographs which show that each well has been given an identification number/letter.

2. OAC Rule 3745-54-97 (C): All monitoring wells must be cased in a manner that maintains the integrity of the monitoring well bore hole. During the field inspection, it was noted that well F does not have a manhole cover. This well is located in an area subject to heavy truck traffic. A manhole cover should be added to this well to protect the well casing from damage and to prevent surface runoff from entering the well vault.

   To return to compliance with the rule, please submit a photograph demonstrating that a manhole cover has been added to protect well F.

Please submit the requested documentation within 30 days of your receipt of this letter. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1162.

Sincerely,

Marlene M. Kinney

Marlene M. Kinney
Environmental Specialist
Division of Hazardous Waste Management

MMK:ddw

Enclosure

ec: Rich Kurlich, DDAGW, NEDO
Natalie Oryshkewych, DHWM, NEDO

DDAGW GROUND WATER INSPECTION CHECKLIST

Site/Facility Name: Hukill Chemical Corp.	Inspection Date: Dec. 18, 2006
Site/Facility Address: 7013 Krick Rd. Bedford, OH 44146	Ohio EPA ID#: 001 926 740
Site/Facility Status (circle one): (Operating) Closed	District: NEDO

Client Division/Program (check applicable)

DSIWM	DHWM	DERR	DSW_____
MSW_____	Interim Standards (65-90 to 94)_____	Remedial Response_____	
ISW_____	Final Standards (54-90 to 100)_____	VAP_____	
RSW_____	CA/IGWMP (54-101)_✓_____		
CDD_____			

Site/Facility Contact, Name & Title: Tim Jones

Client Division Contact: Marlene Kinney	DDAGW Geologist: Rich Kurlich

Names and company affiliations of facility or consulting personnel performing field monitoring and sampling activities:
1. Andrew Foerster – Haley & Aldrich
2.

Others in Attendance: None

Documentation Reviewed Prior to Field Inspection

Ground Water Sampling and Analysis Plan
If the ground water sampling and analysis plan (SAP) has previously been reviewed by DDAGW, it need not be formally reviewed again prior to the field inspection. However, it should be consulted during completion of the office portion of the ground water field inspection form. If DDAGW has not previously reviewed the SAP, a formal review of the document should be requested by the client division and completed as a separate project prior to the field inspection.

1. Has the current SAP been formally reviewed by DDAGW?	Yes ✓ No _____	If yes, document date: Apr. 2001 Approval date (if applicable): June 12, 2001

2. The current SAP is : (circle one) a stand alone document? (included in another document?) If another document, specify:
Section E, of the Part B Permit

3. Sampling and analysis procedures are often modified through correspondence between the regulated entity and Ohio EPA. A new, revised SAP may not be generated as part of this process. If the current SAP has been modified through correspondence between the Ohio EPA and the regulated entity, please list in the space below, the dates of the correspondence and the modifications that were documented and approved.

None

Other Sources of Documentation

The key document for review prior to observing field activities is the SAP; however, it may be necessary to review other documents to establish the evaluation basis for the inspection. Which of the following documents were reviewed by Ohio EPA to determine the applicable monitoring and sampling requirements?

Document:	Yes	No	N/A	Comments:
1. Approved Permit?	✓			If yes, date approved: Jan. 27, 2006 Draft
2. Approved Closure Plan?	✓			If yes, date approved: June 12, 2001
3. Final enforcement actions between AGO/Ohio EPA and facility?		✓		If yes, date signed:
4. Current Ground Water Detection Monitoring Plan (GWDMP)?		✓		If yes, document date:
5. Current Ground Water Quality Assessment Monitoring Plan (GWQAP)?		✓		If yes, document date:
6. Current Ground Water Compliance Monitoring Plan (GWCMP)?		✓		If yes, document date:
7. Previous Ohio EPA inspection?		✓		If yes, inspection date:
8. Other? Please specify_____		✓		

Monitoring Well System

Maintenance & Sampling Information:	Yes	No	N/A	Comments:
1. Do the actual number, locations, and depths of the wells sampled correspond to the SAP or other governing document?	✓			
2. Are the wells maintained properly? (Please refer to the attached *Ground Water Monitoring Well Inspection Form*)		✓		most well need a visible ID on the outer casing; well F is Flush mount in Parking lot but has no cover on the manhole.
3. Are there bumper guards around the wells ?	✓			as needed
4. Are there additional monitoring wells or piezometers present at the site that are not currently used as part of the ground water monitoring program? a) If so, were they also inspected during this visit? b) If inspected, are they constructed/maintained properly? If inspected, please include these wells on the attached *Ground Water Monitoring Well Inspection Form.* If not inspected, please indicate why in the Comments column.		✓		
5. Additional comments:		✓		

Please note that for the purposes of this inspection, the terms "monitoring well" and "well" include piezometers (used to collect water level elevation data only) required by the SAP or other governing document.

Sampling & Analysis Plan Requirements and Field Procedures

Completing the "SAP Requirement" section of the checklist is not meant to constitute a formal review of an already reviewed and approved SAP. It is meant to prepare the DDAGW geologist for the field inspection, where the implementation of the SAP is reviewed and evaluated.

The main purpose of the field inspection (along with a review of monitoring well maintenance) is to address whether the procedures and techniques required by the SAP were properly implemented. The questions posed here are not intended to encompass every detail that may be contained in a SAP. The comments column can be used to document, as necessary, any observations regarding SAP implementation not explicitly addressed by the questions. While the DDAGW geologist can comment if the approved procedures are inadequate to ensure collection of representative ground water samples and protection of human health and the environment, these comments would be considered "recommendations". However, if the inadequate procedures are insufficient to demonstrate compliance with applicable rules, those rules should be cited as part of the inspection findings.

Well Identification: Specify well numbers where ground water purging and sampling procedures were observed by Ohio EPA; Also, specify the parameters being samples at the well(s).	**Wells:** well A **Parameters:** VOCs, Total phosphorus, Alkalinity, nitrate, chloride, nitrogen, Sulfate

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
1. Does the person performing the sampling have a copy of the most current SAP with him/her in the field or is one available at the site?	✓			✓			
2. Measuring ground water levels/elevations (and surface water levels/elevations, if applicable), including:							
a) Measuring ground water levels (and if applicable, surface water levels) within a 24-hour period?		✓		✓			
b) Measuring ground water levels prior to purging and sampling?	✓			✓			
c) Measuring ground water levels (and if applicable, surface water levels) to an accuracy of at least 0.01 ft?	✓			✓			
d) Using a reference point established at the top of each well casing (and at each surface water sampling point, if applicable) to measure each water level?	✓			✓			

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
2. Measuring ground water levels/elevations, cont.:							
e) Procedures for evaluating and documenting the presence of dense non-aqueous phase liquid (DNAPL) and light non-aqueous phase liquid (LNAPL), including measuring the thickness of any NAPLs present?		✓			✓		
f) Is the total depth for each well measured? If so, does it match the total depth of the well documented on the well log? If not, what is the facility's schedule for measuring and evaluating total depths?	✓					✓	Total depth measured annually during the Spring event.
g) Type(s) of device(s) used to measure water levels and total depths?	**SAP:** Electronic water level indicator			**Field:** Electric Tape.			
h) Are water levels used for determining ground water flow direction recorded?	**SAP:** Y			**Field:** Y			
3. Well Purging (Generic to all methods):	**SAP:**			**Field:**			
a) Specify purging method(s) used for each well observed.							
(1) Volumetric Purge?							
(2) Low Flow?	Y			Y			
(3) Minimum/No Purge?							
(4) Purge to Dryness							
(5) Other: _____							
b) Type of equipment used to purge each well observed. Type /material) (Note: Specify particular type of pump or bailer)	**SAP:** Low Flow pump			**Field:** low Flow Geo Pump peristaltic pump			

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
3. Well Purging (Generic), cont.: c) Is purging equipment dedicated?		✓		✓			
d) If equipment is not dedicated, was the equipment properly decontaminated?			✓			✓	
e) If bailers are used, specify the type of cord used with the bailer.	**SAP:** NA			**Field:** NA			
4. For Volumetric Purging: a) Was the volume of water in the well column determined?			✓			✓	
b) Was the purging performed in a manner that minimizes mixing and aeration of the water column?			✓			✓	
c) Were all SAP field stabilization parameters obtained to properly determine when purging is adequate?			✓			✓	
(1) List stabilization parameters obtained:	**SAP:** NA			**Field:** NA			
(2) Were stabilization parameters taken at least every 1 to 1 ½ well volumes?			✓			✓	
(3) Was it demonstrated that three consecutive measurements were within their respective stabilization criteria?			✓			✓	
d) Were samples obtained immediately after purging?			✓			✓	
5. For Low-Flow Purging: a) Was water level drawdown measured during purging?		✓		✓			
b) Was it demonstrated that drawdown stabilized?		✓		✓			

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
5. For Low-Flow Purging, cont.: c) Specify location of pump.	SAP: not specified			Field: dedicated tubing permanently installed in each well.			
d) What was the purging rate?	SAP: not specified			Field: Approx 100 ml/min.			
e) Were all SAP field stabilization parameters obtained to properly determine when purging is adequate?		✓		✓			
(1) List stabilization parameters obtained:	SAP: T, pH, Cond., Turbidity, DO, Redox			Field: same			
(2) Were stabilization parameters taken every 3 to 5 minutes?		✓		✓			
(3) Was it demonstrated that three consecutive measurements were within their respective stabilization criteria?		✓		✓			
f) Were samples obtained immediately after purging?		✓		✓			
6. For Minimum/No Purge: a) If the pump was not dedicated, was the pump placed far enough in advance so that the effect of the pump installation has completely dissipated?			✓			✓	
b) Specify the location of the pump.	SAP: NA			Field: NA			
c) Were steps taken to prevent stagnant water from entering the screened interval of the well?			✓			✓	
(1) Was drawdown measured during purging?			✓			✓	

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
6 For Minimum/No Purge, cont.: c)*(2)* Was the amount of drawdown no more than the distance from the top of the screen and the position of the pump intake within the screen, minus a 2 foot safety margin maintained?			✓			✓	
(3) If other, specify.	**SAP:** NA			**Field:** NA			
7. For Purging to Dryness: Were samples taken as soon as sufficient water was available?			✓			✓	
8. Field parameters for ground water, surface water, and/or leachate, including: **a)** Are field analyses of temperature, pH, and specific conductance performed?	✓			✓			
b) Are field parameters for ground water samples checked after purging and before sampling?		✓		✓			
9. Ground water (and if applicable, surface water or leachate) sample collection, including: **a)** Specify sample collection methods and equipment used:	**SAP:** see Comment			**Field:** See Comment			Samples collected directly From a low flow peristaltic pump into the bottles.
b) Is the ground water sampling equipment dedicated?		✓		✓			Tubing permanently kept in each well
c) If applicable, is the well sampling order from least to most contaminated?			✓			✓	
d) Are sample containers filled in order of parameter volatilization sensitivity, *e.g.*, VOCs, SVOCs, total metals?	✓			✓			

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
9. Ground water (and if applicable, surface water or leachate) sample collection, including, cont.:							
e) If bailers are used, are samples collected in a manner which minimizes mixing and aeration of the well water column?			✓			✓	
f) Specify type of cord or wire used with sampling bailers:	**SAP:** NA			**Field:** NA			
g) If used, are bladder pumps operated in a manner that prevents sample aeration and minimizes sample turbidity?	✓			✓			
h) Are pumps (all types) operated at a rate low enough to prevent sample aeration and minimize sample turbidity?	✓			✓			
10. Calibration of field monitoring and analytical equipment:							
a) Is each device calibrated to its manufacturer's specifications?	✓			✓			
b) Is each device calibrated prior to use in accordance with the SAP?	✓			✓			
c) Are all calibration procedures and/or equipment maintenance (and the date(s) performed) documented on field forms or in a field log book?	✓			✓			
11. Equipment decontamination, including:							
a) If applicable, is all non-dedicated monitoring, purging, and sampling equipment decontaminated between sampling locations in accordance with the SAP?	✓			✓			
b) Is clean or decontaminated sampling equipment placed on the ground or in other potentially contaminated areas prior to use?		✓			✓		
c) Are all decontamination fluids contained and disposed in accordance with the SAP?	✓			✓			

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
12. Purge water disposal, including:							
a) If previous monitoring results indicate that a well has not been contaminated, is all purge water disposed in an area where it cannot affect purging or sampling activities at any sampling location during the ongoing event?	✓			✓			
b) If previous monitoring results indicate that a well has been contaminated, or if the ground water is known to be contaminated, is all purge water properly contained, labeled, stored, transported, and disposed per applicable federal, state, and local laws?	✓			✓			
13. Field sample preparation, including:							
a) Sample containers and handling:							
(1) Are all sample containers pre-cleaned and provided by the laboratory?	✓			✓			
(2) Are any samples field filtered prior to being transferred to their appropriate containers?		✓			✓		
(3) Are samples transferred directly from the sampling device to their appropriate containers in a manner that minimizes agitation and aeration?	✓			✓			
(4) Are VOC sample containers completely filled to form a meniscus and capped in a prompt manner to minimize volatilization?	✓			✓			
(5) Are VOC containers checked for air bubbles after filling and capping?	✓			✓			
(6) If any bubbles were observed, were the vial(s) discarded and a new sample taken?			✓			✓	

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
13. a) <u>Sample containers and handling, cont.</u>: *(7)* If sample(s) could not be obtained without air bubbles, was their presence noted on the field log or field data sheet?			✓			✓	
b) Were samples appropriately preserved? (See Ohio EPA TGM, Revision 1, February 2006, Chapter 10, pp 10-42 to 10-43)	✓			✓			
c) <u>Sample labeling</u>: *(1)* Unique sample (field) identification number that clearly associates the sample and the sampling location?	✓			✓			
(2) Facility/site name?	✓			✓			
(3) Sample type (matrix) and date and time of collection?	✓			✓			
(4) Parameters and analyses requested?	✓			✓			
(5) Sample preservatives?	✓			✓			
(6) Name or initials of sampler and company affiliation?	✓			✓			
(7) Is an indelible pen or marker used to complete sample labels?	✓			✓			
(8) Are sample labels secured and protected to ensure legibility when delivered to the laboratory?	✓			✓			
14. Field Quality Assurance/Quality Control (QA/QC), including: **a)** Use of standard procedures that ensure the validity and reliability of field and laboratory data, as well as representative analytical results?	✓			✓			

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
14. Field Quality Assurance/Quality Control (QA/QC), including, cont.: **b)** Documentation of all deviations from SAP-required procedures?	✓			✓			
c) Collection of the following QA/QC samples in accordance with the SAP: *(1)* Duplicate samples?	✓			✓			
(2) Field blanks?		✓				✓	
(3) Equipment blanks?		✓				✓	
(4) Trip blanks?	✓			✓			
d) Collection of all necessary laboratory QA/QC samples (*e.g.*, matrix spike, matrix spike duplicate)?	✓					✓	
15. Chain-of-Custody (COC) procedures, including: **a)** Are all SAP-required COC procedures followed? (If not, explain why.)	✓			✓			
b) Are standardized COC forms used to establish a complete custody record from the field to the laboratory for all samples?	✓			✓			
c) Is the following field and laboratory information properly documented on the COC form to provide effective sample tracking and to ensure that samples are properly identified, preserved, and analyzed?	✓			✓			
(1) Address and contact information for the site/facility, laboratory, and, if applicable, all consulting firms performing sampling?	✓			✓			

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
15. c) **Field and laboratory information, cont.:**							
(2) Unique sample (field) identification numbers that clearly associate the sampling location and sample?	✓			✓			
(3) Sample type (matrix) and date and time of collection?	✓			✓			
(4) Requested parameters, or a reference for the requested parameters?	✓			✓			
(5) Requested analytical methods, or a reference for the requested analytical methods?	✓			✓			
(6) Types of sampling containers used, or a reference for the types of sampling containers used?	✓			✓			
(7) Types of sample preservatives used, or a reference for the types of sample preservatives used?	✓			✓			
(8) Sample shipping information, including but not limited to the transporter(s), tracking numbers, and delivery time frame(s)?	✓			✓			
(9) Legible names (printed) and signatures of all field and laboratory personnel relinquishing and/or receiving the samples and inclusive dates and times of possession that provide a complete record of sample custody? (Names and signatures of commercial shipping personnel are not required.)	✓			✓			
d) Are custody seals (signed by the sampler) placed on sample coolers prior to shipment to indicate if the cooler has been opened or tampered with during shipment?		✓			unk.		Shipping not observed

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
16. Is the following sampling and water level elevation information properly documented on field forms or in a field log book for each well, surface water, or leachate sampling location observed?							
a) Monitoring program (detection, assessment, or compliance) identified?		✓			✓		
b) Correct reference to well identification number or specific well location?	✓			✓			
c) Static ground water level (elevation), associated measurement technique, date, and time?	✓			✓			
d) Surface water level (elevation), associated measurement technique, date, and time?	✓			✓			
e) Total depth and associated measurement technique for each well?	✓				✓		Info collected during spring sampling only.
f) Presence and thickness of immiscible layers and associated measurement technique?		✓			✓		
g) Well purging procedures and all associated SAP-required information?	✓			✓			
h) Field analyses procedures and all associated SAP-required information?	✓			✓			
i) Sampling procedures and all associated SAP-required information?	✓			✓			
j) Field observations, including but not limited to unusual sample characteristics (appearance, odor, *etc.*), unusual well recharge rates, apparent well damage, potential contamination sources, and unusual climatic conditions?	✓			✓			
k) Equipment malfunction(s)?	✓			✓			

	SAP Requirement?			Field Implementation			Comments Regarding SAP Requirements and/or Field Implementation:
	Yes	No	N/A	Yes	No	N/A	
16. Field Log Forms/Log Book, cont.: l) Any deviations from the SAP and explanation of why such modifications were necessary?	✓			✓			
m) Sampling team personnel and company affiliation?	✓			✓			
17. Are copies of all field forms (and/or field log book), COC forms, and sample shipping documents stored at the site/facility as part of the operating record?	✓			✓			

Sampling & Analysis Plan Requirements and Field Procedures, con't.

Have all discrepancies between the SAP and the field implementation been described in the "Comment" section? Comments should include specific monitoring well (or other sampling) locations where deviations from the SAP and/or other regulatory requirements were observed.

Yes

Additional Comments & Notes:

None

GROUND WATER MONITORING WELL FIELD INSPECTION FORM

Site/Facility Name, Ohio EPA ID#, & Inspection Date: Hukill Chem. Corp., 001 926 740, Dec. 18, 2006

Well identification number:	A	B	C	E	F	G	H	I
Correct location?	Y	Y	Y	Y	Y	Y	Y	Y
Clearly and correctly labeled?	N	N	N	N	N	N	N	N
Locked prior to arrival at well location?	Y	Y	Y	Y	N	Y	Y	Y
Ground water depth:	13.07	11.42	11.35	26.36	4.42	11.92	15.48	5.08
Well total depth:	NM	NM	NM	NM	NM	NM	NM	NM
For above ground completions: **a)** Protective outer casing present?	Y	Y	Y	Y	NA	Y	Y	Y
(1) Condition?	G	G	G	G		G	G	G
(2) Lockable lid and lock? Condition?	Y	Y	Y	Y		Y	Y	Y
(3) Weep hole present?	N	N	N	N		N	N	N
(4) Standing water between protective casing & well casing?	N	N	N	N		N	N	N
b) Surface seal/apron present?	Y	Y	Y	N		Y	N	Y
(1) Condition?	*Cracked	G	G	NA		G	NA	G
(2) Ponded surface water?	A little nearby	N	N	NO, But Mud cracks present	NA	N	N	N

* The facility poured a new apron for this well on Dec. 19, 2006

Well identification number:	A	B	C	E	F	G	H	I
For flush mount completions:								
a) Well vault present?	NA	NA	NA	NA	Y	NA	NA	NA
(1) Condition?					Poor			
(2) Covered with bolted vault lid?					N			
(3) Standing water in vault? Covering top of inner casing?					Y			
b) Surface seal/apron present?					Y			
(1) Condition?					OK			
(2) Raised at least slightly above grade and sloped away from the top of the vault?					Y			
(3) Ponded surface water on top of vault lid?					N			
Inner well casing condition?	G	G	G	G	OK	G	G	G
a) Material?	2" Steel	2" Steel	2" steel	2" steel	2" Steel	2" PVC	2" PVC	2" PVC
b) Survey reference mark?	Y	Y	Y	Y	Y	Y	Y	Y
c) Cap present?	Y	Y	Y	Y	Y	Y	Y	Y
d) If the completion is flush mount, is the cap expandable and locking?	NA	NA	NA	NA	N Threaded	NA	NA	NA
e) Condition of casing and cap?	G	G	G	G	OK	OK	G	G

Additional Comments:

GROUND WATER MONITORING WELL FIELD INSPECTION FORM

Site/Facility Name, Ohio EPA ID#, & Inspection Date:

Well identification number:	SW-2	SW-3	SW-4					
Correct location?	Y	Y	Y					
Clearly and correctly labeled?	Y	N	N					
Locked prior to arrival at well location?	Y	Y	Y					
Ground water depth:	20.18	22.13	9.27					
Well total depth:	NM	NM	NM					
For above ground completions: a) Protective outer casing present?	Y	Y	Y					
(1) Condition?	G	G	G					
(2) Lockable lid and lock? Condition?	Y	G	Y					
(3) Weep hole present?	N	N	N					
(4) Standing water between protective casing & well casing?	N	N	N					
b) Surface seal/apron present?	N	Y	Y					
(1) Condition?	NA	G	OK					
(2) Ponded surface water?	N	N	N					

NM = Not Measured. TD measured annually during the Spring sampling event.

Well identification number:	SW-2	SW-3	SW-4					
For flush mount completions:								
a) Well vault present?	NA	NA	NA					
(1) Condition?								
(2) Covered with bolted vault lid?								
(3) Standing water in vault? Covering top of inner casing?								
b) Surface seal/apron present?								
(1) Condition?								
(2) Raised at least slightly above grade and sloped away from the top of the vault?								
(3) Ponded surface water on top of vault lid?								
Inner well casing condition?	G	G	G					
a) Material?	2" Steel	2" PVC	2" Steel					
b) Survey reference mark?	Y	Y	Y					
c) Cap present?	Y	Y	Y					
d) If the completion is flush mount, is the cap expandable and locking?	NA	NA	NA					
e) Condition of casing and cap?	G	G	G					

Additional Comments: