FINAL SITE CHARACTERIZATION AND SELF-IMPLEMENTING CLEANUP PLAN PAWTUCKET 1 No. 107 SUBSTATION - CONTROL HOUSE 6 THORNTON STREET PAWTUCKET, RHODE ISLAND

SUBMITTED TO:

Mr. Matthew Rigdon United States Environmental Protection Agency Region 1 5 Post Office Square, Suite 100 Mail Code: LCRD07-2 Boston, Massachusetts 02109-3912

ON BEHALF OF:

The Narragansett Electric Company William Howard Lead Environmental Professional 280 Melrose Street Providence, Rhode Island 02907

PREPARED BY:



March 30, 2023 Coneco Project No. 5675.F.101

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Environmental Ecological Survey Civil

March 30, 2023 Coneco Project No. 5675.F.101

Mr. Matthew Rigdon United States Environmental Protection Agency Region 1 5 Post Office Square, Suite 100 Mail Code: LCRD07-2 Boston, Massachusetts 02109-3912

RE: **Final Site Characterization and Self-Implementing Cleanup Plan** Pawtucket 1 No. 107 Substation - Control House 6 Thornton Street Pawtucket, Rhode Island

Dear Mr. Rigdon:

On behalf of The Narragansett Electric Company (TNEC), Coneco Engineers & Scientists, Incorporated (Coneco) respectfully submits the following *Final Site Characterization and Self-Implementing Cleanup Plan* to address polychlorinated biphenyl (PCB) concentrations identified in building materials associated with the Control House situated within the Pawtucket 1 No. 107 Substation, located at 6 Thornton Street in Pawtucket, Rhode Island. This submittal supplements the *Preliminary Site Characterization and Self-Implementing Cleanup Plan* submitted to the United States Environmental Protection Agency (EPA) on April 14, 2022, as well as the EPA Comments received by TNEC and Coneco on November 10, 2022. Procedures cited in this report are consistent with those specified in the Toxic Substances Control Act, 40 CFR 761 and the Rhode Island Department of Environmental Management *Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases*.

If you have any questions or require additional information regarding this submittal, please contact the undersigned.

Respectfully Submitted, Coneco Engineers & Scientists, Incorporated

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1.0 INTRODUCTION

The following *Final Site Characterization and Self-Implementing Cleanup Plan* has been prepared by Coneco Engineers & Scientists, Incorporated (Coneco) and is submitted on behalf of The Narragansett Electric Company (TNEC) to address polychlorinated biphenyl (PCB) concentrations identified in building materials at the Pawtucket 1 No. 107 Substation control building, located at 6 Thornton Street in Pawtucket, Rhode Island. This submittal supports the *Preliminary Site Characterization and Self-Implementing Cleanup Plan* submitted to the United States Environmental Protection Agency (EPA) on April 14, 2022. In addition, this final report addresses EPA's Comments to the April 14, 2022, *Preliminary Site Characterization and Self-Implementing Cleanup Plan* which were received by TNEC and Coneco on November 10, 2022. The "Property" is defined as the approximately 10.3-acre parcel owned by TNEC identified as Lot 645 on Pawtucket Assessor's Plat Map 65. The north-central portion of the Property is occupied by the Pawtucket 1 No. 107 Substation (the Site). The five-story brick control house at the Site in which regulated concentrations of PCBs have been identified in building materials, and the subject of this investigation, is hereinafter defined as the "Control House."

Characterization activities were initiated at the request of TNEC in advance of the proposed demolition of the existing Control House. The purpose of initial characterization activities was to establish if building materials associated with the Control House contain certain hazardous materials which may be regulated for disposal in accordance with applicable state and/or federal regulations. The findings of initial characterization activities were detailed in the *Preliminary Site Characterization and Self-Implementing Cleanup Plan* prepared by Coneco on behalf of TNEC and submitted to the EPA on April 14, 2022. Initial characterization activities identified PCB Remediation Waste in select building materials associated with the Control House.

Subsequent to the submittal of the *Preliminary Site Characterization and Self-Implementing Cleanup Plan*, the Control House was de-energized in the Winter of 2022. Additional assessment was conducted in previously inaccessible areas of the Control House (i.e., inaccessible due to safety considerations relative to energized electrical equipment) and in response to the EPA's Comments received on November 10, 2022.

The activities and findings detailed herein are provided to document assessment activities, describe the nature and extent of materials which are subject to the management and disposal requirements of the Toxic Substances Control Act (TSCA), 40 CFR 761, and provide details in support of the proposed Self-Implementing Cleanup Plan. Procedures and regulations cited in this report are consistent with those included in 40 CFR 761, and presented by the EPA and the Rhode Island Department of Environmental Management (RIDEM) *Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases* (Remediation Regulations).

2.0 GENERAL SITE INFORMATION

2.1 Site Contact Information

a) The contact information for the Responsible Party performing the Self-Implementing Cleanup is as follows:

The Narragansett Electric Company Mr. William Howard Lead Environmental Professional 280 Melrose Street Providence, Rhode Island 02907 Tel: (401) 784-7490 E-mail: <u>WRHoward@rienergy.com</u>

b) The contact information for the party submitting this *Final Site Characterization and Self-Implementing Cleanup Plan* is as follows:

Coneco Engineers & Scientists, Incorporated Mr. John Aevazelis Principal Environmental Scientist 4 First Street Bridgewater, Massachusetts 02324 Phone: (508) 962-7423 E-mail: Jaevazelis@coneco.com

c) The contact information for the environmental services contractor conducting the building demolition, remediation activities, and PCB waste transportation and disposal, as well as preparing the contractor work plan detailing the means and methods for removal and disposal activities, is pending and will be provided to EPA prior to the initiation of removal and disposal activities.

The certification statement required by 40 CFR 761.61(a)(3)(E) is included as Appendix 1.

2.2 Site Description

The Property consists of approximately 10.3 acres (448,668 square-feet) with the northcentral portion of the Property occupied by the Pawtucket 1 No. 107 Substation (the Site), which is bounded by a gated and locked chain-link fence topped with barbed wire. The fivestory Control House, consisting of an approximately 12,000 square-foot building footprint, is located north of the outdoor electrical equipment and related structures at the Site. The Site can be accessed from the west via a gate at the corner of Merry Street and Thornton Street. Access to the substation is restricted to TNEC and authorized subcontractors. The Site is located within a mixed-use industrial, commercial, and residential portion of Pawtucket, Rhode Island. The Francis J. Varieur Elementary School is located approximately 550 feet southwest of the Control House, and the International Charter School/Blackstone Academy Charter School is located approximately 750 feet northwest of the Control House. A Site Locus Map and Aerial Image are provided for reference as Figures 1 and 2, respectively. Photographs of the Control House and relevant areas of investigation are included as Appendix 2.

The Property was formerly used by the Pawtucket Gas Company as an electric power plant and manufactured gas plant (MGP), referred to as the Tidewater Gas Works. The MGP generated gas using coal and coke and operated from the 1880s until the late 1960s. In 1890, the Pawtucket Gas Company began building the Pawtucket 1 Station to generate electricity. The power station, operating from the early 1890s until 1975, used coal, petroleum-based products, and residual by-product tars from the MGP station to generate electricity. TNEC is currently performing remedial activities (as part of a RIDEM-approved Remedial Action Work Plan [RAWP]) to address contaminated soil and groundwater at the Property. Remedial actions include source area removals, installation of an engineered cap, construction of a subsurface containment wall to mitigate migration of non-aqueous phase liquid (NAPL) to the Seekonk River, and the recording of an Environmental Land Use Restriction (ELUR) to limit future uses of the Property. The RIDEM Case No. for this work is SR-26-0934A (formerly RIDEM Case No. 95-022). The northern abutting property to the Control House is currently undergoing significant remediation and construction associated with the redevelopment of the property as a recreational area including an entertainment stadium, commercial business, and residential dwellings.

The Control House was constructed in 1907 as part of the electric power plant and has undergone multiple additions and renovations. The five-story Control House has a footprint of approximately 12,000 square feet (80 feet wide by 150 feet long). The Control House was constructed on battered stone masonry and brick masonry foundations with approximately 16-inch-thick brick masonry exterior walls and a concrete slab roof covered by asphaltic roofing membrane. The eastern half of the Control House comprises a large, full-height space that housed the former power plant "Turbine Room". This space contains a gantry crane & crane rails supported by a row of steel columns that are constructed integral with the existing brick masonry bearing wall at the east edge of the Control House, and a row of steel columns that are constructed integral with a multi-level steel framed mezzanine structure at the west edge of the Turbine Room.

The existing ground floor level of the Turbine Room was previously lower than its current elevation. A partial basement was historically located at the east edge of the Control House at a depth consistent with the adjacent western basement (i.e., Rooms 1 through 8), approximately 6 feet below exterior surface grade. According to TNEC records, due to structural concerns with the exterior walls of the Control House, the entryways to these basement areas were partially blocked off with unreinforced masonry walls, and the remaining Turbine Room floor area was infilled and covered with soil and trap rock, in the 1970s.

According to information provided in the *Due Diligence Structural Evaluation* prepared by Odeh Engineers dated May 30, 2014, the western portion of the Control House is comprised of multiple floor levels of varying heights that house formerly active electrical infrastructure, control room equipment, and miscellaneous utility and storage spaces. Steel columns appear to be constructed integral with the existing brick masonry walls and provide structural support for the roof framing and intermediate floor framing. The intermediate floor levels

are constructed with concrete structural slabs supported by either concrete encased steel beams or exposed steel beams that span east to west between additional concrete encased steel framing members constructed integral with the existing brick masonry bearing walls.

The Control House currently contains de-energized electrical equipment; however, it is no longer utilized for electrical operations at the substation. The Control House layout can be referenced in Plan Sets 3 through 7. The Control House, as currently configured, includes a cable vault, reactor room, switchboard/control room, circuit breaker rooms, a transformer room, bus room, and a lightning arrestor room. The vacant Turbine Room and a series of smaller vacant rooms (former partial basement areas that were not filled) occupy the eastern portion of the Control House. Characterization sampling of crushed stone and soil fill material in the Turbine Room was conducted as part of this investigation, as discussed in Section 4.4; however, sampling was limited by safety concerns regarding the structural integrity of the western exterior walls of the Control House. Additional characterization and/or verification sampling is proposed following the demolition of the Control House, as detailed in Section 7.0.

Records regarding the prior configuration of equipment within the Control House, including records pertaining to oil-filled electrical equipment, are limited and incomplete. These limited records indicate that oil-filled electrical equipment has been historically present within portions of the Control House. According to interviews with TNEC personnel, oil-filled circuit breakers were replaced with vacuum (air) circuit breakers at some time in the past. Paper insulated lead covered cables were noted in the cable vault on the first floor of the Control House. Cable oil is contained within the lead sheath of the cables. Records regarding the PCB-content of mineral oil dielectric fluid (MODF) within electrical equipment (i.e., breakers, regulators, transformers) in the Control House were reviewed by Coneco and are discussed in Section 2.4. Additionally, TNEC personnel indicated that damaged electrical equipment was historically staged and repaired in the northern portion of the third-floor hallway of the Control House.

A new, approximately 1,080 square-foot electrical distribution building was constructed directly east of the existing outdoor substation as part of regional upgrades to the electric distribution system. Construction activities associated with these regional upgrades were completed in the Fall of 2022 and the existing Control House has been rendered obsolete and de-energized. Electrical equipment is scheduled to be removed from the Control House prior to demolition, which is currently scheduled for the Winter of 2023/24.

Coordinates:	Latitude 41.86770°	Longitude -71.38140°	
	UTM 4,637,845 Meters N	302,351 Meters E (Zone 19)	
Assessors'			
Information:	According to the City of Pawtucket Assessor's Office, the		
	Property is identified as Lot 645 on Assessor's Plat Map 65,		
	located at 6 Thornton Street within a mixed-use industrial and		
	residential portion of Pawtucket, Rhode Island. The Site and		
	Control House comprise a portion of the Property. The Property		
	is zoned for public utility use.		

Occupancy	
& Use:	The north-central portion of the Property (the Site) is currently used as an active electrical transmission and distribution substation with outdoor and indoor components. The Control House remains unoccupied, and the electrical equipment contained within, is currently de-energized. Two electrical transmission line towers and associated overhead transmission lines are situated in the southeastern portion of the Property. Remaining portions of the Property consist of vacant land, currently undergoing redevelopment. The Site is not accessible by the public and access is restricted to TNEC and authorized subcontractors.
Adjacent Land Use:	The Control House is surrounded by TNEC-owned electrical infrastructure. The Seekonk River abuts the Property to the east. An active natural gas regulator station is located on the northern abutting parcel. Residential properties are located west and southwest of the Property. The Francis J. Varieur Elementary School is located southwest of the Control House. A mixed use residential, commercial, and entertainment complex is currently being constructed north of the Property.

2.3 Sensitive Receptors

The RIDEM Environmental Resource Map (http://www.dem.ri.gov/maps) was reviewed online for the Control House and surrounding area on February 6, 2023. According to information presented in the RIDEM Environmental Resource Map, the Control House is not located within the geographic boundaries of a groundwater resource area. The Control House is located within a Natural Heritage Area. The Seekonk River is located approximately 200 feet east of the Control House. Local conservation land is located approximately 475 feet northeast of the Control House. No other environmentally sensitive areas, as defined in Section 1.4.21 of the RIDEM <u>Remediation Regulations</u>, were noted within a 500-foot radius of the Control House. Municipal water and sewer systems historically serviced the Control House and adjacent properties, and no private water supply wells were observed in the vicinity of the Control House.

2.4 Potential PCB Sources

Due to the age of the Control House and its historical use for electrical generation and distribution, oil-filled electrical equipment containing PCBs has historically been present in the Control House. Historical plans depict oil-filled circuit breakers and oil-filled potential capacitor voltage transformers formerly utilized within the Control House. According to interviews with TNEC, some former oil-filled circuit breakers have been replaced with vacuum (air) circuit breakers. Records regarding the PCB-content of MODF within electrical equipment (i.e., breakers, regulators, transformers) in the Control House, currently or historically, were requested and reviewed by Coneco during this investigation. Additionally, TNEC personnel indicated that damaged electrical equipment was historically staged and repaired in the northern portion of the third-floor hallway of the Control House.

A total of 59 operating or decommissioned pieces of oil-filled electrical equipment were identified in TNEC's historical records, of which only 13 had information on PCB testing of the oil. TNEC's records identified one piece of oil-filled equipment, a decommissioned oil-filled circuit breaker, manufactured by Westinghouse Electric Corporation in June of 1950, that formerly contained PCB-contaminated MODF. This circuit breaker was reportedly retired and removed from the control house in 2009. TNEC's records indicated that the remaining oil-filled equipment for which PCB information was available were characterized as non-PCB.

Oil-filled electrical equipment currently present within the Control House will be assessed and removed prior to demolition in accordance with applicable state and federal regulations. Prior to removal of the electrical equipment, TNEC and/or a qualified contractor will collect MODF samples from the oil-filled equipment scheduled for removal to be analyzed for PCBs by EPA Method 8082. The MODF analytical results will be evaluated, and the electrical equipment will be removed from the Site by TNEC and/or a qualified contractor for proper disposal.

PCBs were widely used in the manufacture of certain building materials from approximately 1950 to 1979. Potential sources of PCBs in buildings built or renovated between about 1950 and 1979 include caulking, paints, mastics and other adhesives, fireproofing materials, and the capacitors of fluorescent light ballasts. Based on the age of the Control House and potential for repairs and/or renovations to have been performed during this time period, building materials associated with the Control House may contain regulated concentrations of PCBs.

2.5 Project Information

As detailed further in Section 7.0, the proposed Control House demolition includes the removal of above grade building structure, including the subgrade walls and foundation to a proposed depth of approximately 4 feet below existing exterior grade. Note that the subject investigation was limited to the Control House building structure and this submittal pertains only to the demolition and disposal of the Control House building structure. Soil and/or groundwater located adjacent to or beneath the Control House was not assessed as part of this investigation. Soil and/or groundwater remaining at the Property following the completion of the demolition activities will be addressed and managed by others in accordance with ongoing RIDEM-approved remedial actions and other applicable regulations. As detailed in Section 7.0, the portions of the Control House subsurface walls and foundations located greater than 4 feet below existing exterior surface grade are scheduled to be retired in place within the footprint of the Control House. Following the completion of building demolition activities, verification sampling in accordance with 40 CFR 761 Subpart O will be conducted to determine if materials (i.e., soil, concrete, and/or brick) which are proposed to remain within the footprint of the former Control House contain regulated concentrations of PCBs. If the verification sampling activities indicate that regulated concentrations of PCBs remain in materials (i.e., soil, concrete, and/or brick) within the footprint of the Control Building, RIDEM and EPA will be notified, and the materials will be addressed in future regulatory submittals.

3.0 INITIAL HAZARDOUS BUILDING MATERIAL ASSESSMENT

Between 2018 to 2021, at the request of TNEC, Coneco conducted initial sampling activities to evaluate building materials prior to the proposed retirement and demolition of the Control House. Sampling activities were performed to assess whether a historical release(s) of PCBs occurred within the Control House and/or if certain building materials contain regulated concentrations of PCBs. In addition, sampling activities were conducted within the Control House to evaluate for the presence of asbestos-containing material (ACM) and paint containing heavy metals (specifically cadmium, chromium, and lead).

In order to characterize select materials associated with the Control House that may contain certain hazardous materials and establish if a release of oil and/or hazardous material (OHM) occurred within the Control House, Coneco conducted a visual assessment and subsequent sampling activities for materials characterization, where feasible. Initial sampling activities were limited in select portions of the Control House due to the presence of energized and in service electrical equipment at the time of initial assessment activities and the need to maintain appropriate safety protocols regarding minimum approach distances. Therefore, initial sampling locations were limited to safely accessible areas beyond the minimum approach distances associated with energized electrical equipment.

Initial assessment and investigation activities in the Control House included the collection and laboratory analysis of representative concrete, brick, paint, bulk building material, and wipe samples, as well as an asbestos survey. Samples collected as part of this investigation were submitted to ESS Laboratory (ESS), a Rhode Island and National Environmental Laboratory Accreditation Program (NELAP)-certified analytical laboratory located in Cranston, Rhode Island, for laboratory analysis of PCBs by EPA Method 8082 using a manual Soxhlet extraction per EPA Method 3540. Select paint samples were also submitted for cadmium, chromium, and lead analysis by EPA 6000/7000 Series Methods. Select bulk materials samples were submitted to AmeriSci Virginia Laboratory (AmeriSci), an independent NELAP-certified analytical laboratory located in Midlothian, Virginia, for qualitative bulk asbestos analysis using polarized light microscopy. Sample identifications were assigned based on the material type and sampling location (i.e., floor, wall, first floor, second floor, etc.). Sample identifications, locations, and total PCB concentrations can be referenced in Plan Sets 3 through 7. Laboratory analytical documentation is included as Appendix 3. Analytical results are discussed in Section 6.0.

3.1 Initial Concrete and Brick Sampling

From October 2018 to October 2021, Coneco collected a total of 312 porous material samples (i.e., concrete, brick, and mortar) representative of floors, walls, ceilings, stairs, and/or former equipment foundations/structures located within the Control House. The initial concrete sample locations were selected to characterize areas most likely subject to potential impact based on surficial staining (discoloration), high foot traffic, and the configuration of former and current oil-filled equipment. Initial concrete sampling was limited (i.e., sampling was not conducted along a 3-meter grid in accordance with 40 CFR 761, Subpart N

throughout the Control House) and was conducted to obtain baseline information regarding the presence or absence of regulated concentrations of PCBs.

In areas where concentrations of PCBs were initially identified within concrete and brick wall and/or floor samples equal to or in excess of 1 milligram per kilogram (mg/kg), a 3-meter sampling grid was overlaid throughout the area in accordance with 40 CFR 761, Subpart N to delineate the extent of PCB Remediation Waste (which, in some cases, included sampling the adjacent concrete wall, ceiling, and/or brick and mortar walls). In addition to lateral delineation sampling, depth delineation sampling activities were conducted in select areas to further define the limits of PCB concentrations within the Control House.

Concrete and brick samples were collected in accordance with the EPA method described in EPA Region I Standard Operating Procedure (SOP) for Sampling Concrete in the Field. Prior to porous material sample collection, the sample locations were cleared of surficial dust and/or debris. Where paint or other surface coating was present, it was removed prior to sampling. A total of 278 concrete floor/ceiling samples, 22 concrete wall samples, and 12 brick wall samples were submitted to ESS for PCB analysis. Concrete and brick sample analytical results are tabulated for reference in Tables 1 through 3.

3.2 Initial Paint Sampling

The exterior of the Control House primarily consists of unpainted brick. Exterior painted surfaces include doors, doorframes, and a steel fire escape stairway. Exterior painted surfaces were noted to be in fair condition and paint chips were not observed on the ground surface. Interior walls and ceilings consist of painted brick and/or concrete. Concrete floors within the Control House were not observed to be painted.

From October 2018 to October 2021, Coneco collected a total of 256 paint chip (porous material) samples from painted surfaces within the interior and exterior of the control house (i.e., concrete and/or brick and mortar walls, floors, ceilings, interior and/or exterior metal doors, concrete stairs, steel handrails, metal window frames, steel beams, etc.) associated with the Control House. During initial paint assessment activities, a minimum of one representative sample was collected from each homogenous surface of paint (distinct paint type where feasible) to obtain baseline information regarding the presence or absence of regulated concentrations of PCBs. Following receipt of laboratory analytical results for the initial characterization paint samples, additional paint sampling was conducted in order to:

- 1) Delineate PCB concentrations greater than or equal to 50 mg/kg and determine if greater than or equal to 50 mg/kg PCB paint is classified as PCB Remediation Waste or PCB Bulk Product Waste;
- Evaluate if paint types in which PCBs greater than or equal to 1 mg/kg but less than 50 mg/kg were detected during the initial paint assessment are classified as PCB Remediation Waste or Excluded PCB Products;
- In areas where a release to the unpainted concrete floor was identified, adjacent paint samples were analyzed to evaluate if paint may have been impacted by a historical liquid release (i.e., to delineate potential PCB Remediation Waste in media adjacent to impacted concrete);

4) Gather additional data and further the lines of evidence to support the waste classification for each paint type identified within the Control House.

Additional paint samples were collected at varying locations (separate rooms, different walls within the same room, varying heights along the same wall, different lateral locations on the same wall, etc.) to provide data on the distribution of PCB concentrations and lines of evidence of the likely source of the detected PCB concentrations in certain paint samples.

Paint chip samples were collected in accordance with the method described in EPA SOP No. 2011 for Chip, Wipe, and Sweep Sampling. Samples were obtained using disposable dedicated razor blades and then placed in the appropriate sample containers. Paint sample descriptions, location, substrate, and analytical results are tabulated for reference in Table 4.

3.3 Initial Bulk Building Material Sampling

In October 2018 and September 2021, Coneco collected a total of 57 representative bulk building material samples including but not limited to caulk, window glazing, tar paper, conduit sealants, gaskets, and weather stripping from the interior and exterior of the Control House. Initial bulk building material sampling was conducted to obtain baseline information regarding the presence or absence of regulated concentrations of PCBs and asbestos. Supplemental bulk material sampling was conducted in areas where PCBs were identified in bulk materials in excess of 1 mg/kg to evaluate whether the potential source of the PCBs is associated with a liquid release, or the result of historical manufacturing process. Bulk material sampling procedures were conducted in accordance with the EPA method described in EPA SOP No. 2011 for Chip, Wipe, and Sweep Sampling. The samples were obtained using disposable dedicated razor blades. Bulk material sample descriptions and PCB analytical results are tabulated for reference in Table 5.

3.4 Initial Wipe Sampling

Between September 2019 and October 2021, Coneco collected a total of 24 PCB wipe samples from unpainted and painted surfaces throughout the Control House to gather baseline data on the potential for tracking and/or migration of PCBs throughout the Control House interior via dust particulates and/or air vapors. Wipe samples were collected from both high traffic and air circulation areas (HVAC system components, stairwells, etc.) as well as low traffic and limited air flow areas to offer a comparison of PCB concentrations in potentially high tracking and low tracking areas. Standard hexane-prepared wipe samples were collected over 100 square-centimeter areas in accordance with the method described in EPA SOP No. 2011 for Chip, Wipe, and Sweep Sampling, and 40 CFR 761.123. Wipe sample analytical results are tabulated for reference in Table 6.

4.0 SUPPLEMENTAL HAZARDOUS BUILDING MATERIAL ASSESSMENT

Following the submittal of the *Preliminary Site Characterization and Self-Implementing Cleanup Plan* as well as the de-energization of the Control House, Coneco conducted supplemental sampling of the interior and exterior of the Control House. Supplemental sampling locations were selected to:

- 1. Address comments received from the EPA on November 10, 2022, regarding the *Preliminary Site Characterization and Self-Implementing Cleanup Plan* dated April 14, 2022;
- 2. Characterize portions of the Control House which were previously inaccessible due to the presence of energized electrical equipment; and
- 3. To further delineate PCB concentrations identified during the initial sampling period.

Supplemental assessment and investigation activities in the Control House included the collection and laboratory analysis of representative concrete, paint, bulk building materials soil, and trap rock. Samples collected as part of this investigation were submitted to ESS for laboratory analysis of PCBs by EPA Method 8082 using a manual Soxhlet extraction per EPA Method 3540. Paint samples were also submitted for cadmium, chromium, and lead analysis by EPA 6000/7000 Series Methods. Select bulk materials samples were submitted to AmeriSci for qualitative bulk asbestos analysis using polarized light microscopy. Sample identifications, locations, and total PCB concentrations can be referenced in Plan Sets 3 through 7. Laboratory analytical documentation is included as Appendix 3. Analytical results are discussed in Section 6.0.

4.1 Supplemental Concrete Sampling

From October 2022 to January 2023, Coneco collected a total of 108 concrete samples representative of floors, walls, ceilings, and/or former equipment foundations/structures located within the Control House. The supplemental concrete sample locations were selected to characterize areas most likely subject to potential impact based on surficial staining (discoloration), high foot traffic, and the configuration of former and current oil-filled equipment. Supplemental concrete sampling was limited (i.e., sampling was not conducted along a 3-meter grid in accordance with 40 CFR 761, Subpart N throughout the Control House) and was conducted to obtain additional information regarding the presence or absence of regulated concentrations of PCBs. Depth delineation sampling activities were conducted in select areas to further define the limits of PCB concentrations within the Control House.

Prior to porous material sample collection, the sample locations were cleared of surficial dust and/or debris. Where paint or other surface coating was present, it was removed prior to sampling. A total of 103 concrete floor/ceiling samples and 5 concrete wall samples were submitted to ESS for PCB analysis. Concrete sample analytical results are tabulated for reference in Tables 1 and 2.

4.2 Supplemental Paint Sampling

From October 2022 to January 2023, Coneco collected a total of 12 paint chip (porous material) samples from painted surfaces within the interior and exterior of the Control House (i.e., concrete walls, ceilings, steel handrails, etc.) associated with the Control House. During supplemental paint assessment activities, additional samples were either collected (three per distinct paint type) or, due to the limited quantity of the distinct paint type, it was not feasible to collect three distinct samples. In situations where three distinct samples were not able to be collected, those materials were conservatively classified as PCB Remediation Waste to streamline the characterization process using the most conservative disposal method. The supplemental paint samples were also collected to address additional characterization

sampling requested in the EPA Comments received by TNEC and Coneco on November 10, 2022.

Paint chip samples were collected in accordance with the method described in EPA SOP No. 2011 for Chip, Wipe, and Sweep Sampling. Samples were obtained using disposable dedicated razor blades and then placed in the appropriate sample containers. Paint sample descriptions, location, substrate, and analytical results are tabulated for reference in Table 4.

4.3 Bulk Building Material Sampling

In January 2023, Coneco collected a total of 6 supplemental, representative bulk building material samples including floor tile, acoustic tile and plywood from the interior of the Control House. Bulk material sampling procedures were conducted in accordance with the EPA method described in EPA SOP No. 2011 for Chip, Wipe, and Sweep Sampling. The samples were obtained using disposable dedicated razor blades. Bulk material sample descriptions and PCB analytical results are tabulated for reference in Table 5.

4.4 Soil and Trap Rock Sampling

As discussed in Section 2.2, the Turbine Room has been infilled with soil to approximately exterior surface grade and covered with approximately 4 inches of trap rock (crushed stone). A concrete slab floor is assumed to be present below the infill material at approximately 6 feet below surface grade. In January 2023, Coneco collected a total of 5 representative surficial trap rock samples and 5 collocated soil samples (at depths below the surficial trap rock layer) from the infill material associated with the Turbine Room. Soil samples were collected from 4 to 10 inches below grade. Soil and trap rock sampling was conducted to obtain baseline information regarding the presence or absence of regulated concentrations of PCBs in the infill material. Soil and trap rock samples were collected using dedicated disposable scoopulas. Trap rock samples were pulverized and homogenized by ESS prior to analysis. Soil and trap rock PCB analytical results are tabulated for reference in Table 7.

5.0 QUALITY ASSURANCE AND QUALITY CONTROL

5.1 QA/QC Sampling and Analytical Results

A quality assurance/quality control (QA/QC) program including the collection of one blind collocated field duplicate sample for every 20 samples was employed as part of Coneco's investigation. Matrix spike/matrix spike duplicate results were requested for the blind collocated field duplicates and the corresponding initial samples. Coneco's review of laboratory data for blind collocated field duplicate samples identified no significant disparity between results of the collocated duplicates and the corresponding collocated results and the results of the corresponding collocated environmental assessment samples are tabulated for reference as Table 8.

5.2 Data Evaluation

Following the receipt of analytical results, Coneco conducted a data validation review to ensure that laboratory data is of defensible analytical quality. Procedures employed were consistent with *EPA Region I Data Validation Functional Guidelines for Evaluating Environmental Analyses*.

Coneco's review of laboratory documentation, including analytical results, narratives, and chain-of-custodies provided by ESS for collected concrete, brick, paint, bulk material, and wipe samples identified no departure from the requirements specified by the EPA. Coneco also conducted an evaluation of information provided by ESS concerning sample integrity, chain-of-custody procedures, QA/QC, and necessary report components. Any nonconformance to QC objectives are listed in the laboratory reports. Based on the information presented by ESS and AmeriSci and considering the scope of use for the presented analytical results, it is the opinion of Coneco that the presented laboratory data follows the applicable EPA and RIDEM standards and laboratory QC requirements. Therefore, laboratory data produced for samples collected from the Site are considered valid and do not require adjustment.

Please note that although full data packages were produced for Site Characterization laboratory analytical results, only the cover page, table of contents, analytical narrative, certification, result sheets, sample receipt checklist, and chain-of-custody forms for each data set are included in Appendix 3. Full data package information will be provided at the request of the EPA or RIDEM.

5.3 Data Gaps

Based on the sampling activities conducted to date, the following data gaps have been identified:

- Due to the size and layout of the Control House, as well as the nature of the project as a building demolition rather than a building renovation, initial Site Characterization sampling was limited and did not strictly comply with the characterization requirements of 40 CFR 761 Subpart N (i.e., sampling was not conducted along a 3-meter grid throughout surfaces within the entire Control House) in an attempt to make broad, conservative assumptions for waste handling during demolition. The sampling program to date was designed to assess for the presence of regulated concentrations of PCBs in areas/materials that are most likely to contain PCBs and delineate identified impacts based on potential migration pathways. In areas where concentrations of PCBs equal to or in excess of 1 mg/kg were initially identified within concrete and brick walls and/or floors samples (and were therefore considered potential PCB Remediation Waste), a 3-meter sampling grid was overlaid throughout the area in accordance with 40 CFR 761, Subpart N to delineate the extent of potential PCB Remediation Waste.
- There is no record of oil-filled electrical equipment or other liquid sources of PCBs in some areas, for example: Room A. Sampling in these areas was conducted as a conservative measure to screen for the presence of PCBs attributable to

tracking/migration, or the historical use of PCBs in manufacturing processes.

- PCB concentrations have not been fully vertically depth delineated in accordance with the requirements of 40 CFR 761 Subpart N. Depth delineation was performed at select locations to gain representative data of vertical extent of PCB concentrations to aid in the development of removal plans. As detailed in Section 7.1, in areas where full depth delineation was not conducted; PCB removal activities will either include the complete removal of PCB Remediation Waste with no remaining substrate (e.g., removal of full floor sections) or post-removal verification sampling will be conducted in accordance with 40 CFR 761 Subpart O.
- The eastern exterior wall of the Turbine Room is structurally compromised, and loose brick debris has intermittently become dislodged from the wall. This structural deterioration presents a significant safety risk and is both a primary cause for the proposed demolition effort as well as a limiting factor for sampling in the immediate vicinity. Historical records provided by TNEC indicate that the Turbine Room was infilled with approximately 6 feet of imported material to support and stabilize the eastern exterior basement wall. Although as-built drawings are not available, TNEC reported that the infilling likely occurred in the 1970s. However, Coneco was able to safely collect at least one paint sample per distinct paint type used in the Turbine Room, as well as obtain concrete samples from the concrete foundations within the Turbine Room. Additionally, a total of 5 representative soil samples and 5 collocated trap rock samples were collected from the infill material associated with the Turbine Room and analyzed for PCBs.
- The Turbine Room has been filled to grade and covered with trap rock (crushed stone), making the lower walls and sub-grade floor of the turbine room inaccessible for inspection and sampling. Coneco cannot make any statement concerning OHM releases, and/or PCB concentrations in building materials that may be concealed by the fill material. Portions of the Control House foundation and footings remaining on-Site following demolition will be assessed following the completion of Control House demolition activities and regulated PCB concentrations, if identified, will be addressed in future regulatory submittals, as detailed in Section 7.2.

6.0 EXTENT OF IMPACTS

As a result of sampling activities, concentrations of PCBs equal to or in excess of 1 mg/kg were identified in concrete, brick, paint, and bulk building materials associated with the Control House. PCB concentrations identified in these materials may be attributable to one or more of the following:

- Spills, releases, or other unauthorized disposals (i.e., direct impact from liquid sources)
- Impact via direct contact transfer by site workers and/or contaminated equipment (i.e., a historical tracking scenario)

- Impact to porous surfaces which may act as sinks for airborne PCBs via indoor air/vapor/dust
- Building materials (i.e., paint, caulk, etc.) historically manufactured with PCBs

Potential sources of PCBs currently and/or historically located within the Control House from which a release may have occurred include oil-filled electrical equipment. As the Control House was constructed in 1907, with operations and maintenance ongoing since then, there is the potential for building materials manufactured with PCBs to be present (i.e., products manufactured with PCBs). Materials containing concentrations of PCBs equal to or in excess of 1 mg/kg may be classified or conservatively managed as one of the following in accordance with at 40 CFR 761.3:

- **PCB Remediation Waste**: Materials containing concentrations of PCBs equal to or in excess of 1 mg/kg as the result of spills, releases, unauthorized disposals, or impact via direct contact transfer by site workers and/or contaminated equipment (i.e., a historical tracking scenario) are classified as PCB Remediation Waste.
- **Bulk PCB Product Waste**: Waste derived from manufactured products containing PCBs in a non-liquid state, at any concentration where the concentration at the time of designation for disposal is equal to or greater than 50 mg/kg.
- Excluded PCB Products: Materials manufactured with PCBs at concentrations of less than 50 mg/kg before October 1, 1984 and resulting PCB concentration is not a result of dilution or a release of PCBs from a source equal to or in excess of 50 mg/kg.

In accordance with 40 CFR 761.3, if materials are to be managed as Excluded or Bulk Product Waste, it must be demonstrated that the PCBs are not present due to a liquid release.

6.1 PCB Remediation Waste

Based on the findings of the investigation efforts conducted to date, two distinct areas of concern representing PCB Remediation Waste, as defined at 40 CFR 761.3, have been identified, as detailed below:

- <u>Area of Concern (AOC) 1</u>: PCBs identified in excess of 1 mg/kg related to a suspected liquid release(s) of PCBs from historical electrical equipment maintenance conducted in the northern portion of the Third Floor Hallway of the Control House. AOC-1 includes unpainted concrete floors, painted concrete and/or brick masonry walls, painted concrete ceilings, stairways, doors, cabinets, and windows. According to information provided by TNEC, this area was historically utilized on an intermittent basis as a "workshop" for equipment repair and fabrication.
- <u>AOC 2</u>: PCBs identified in excess of 1 mg/kg in high traffic areas (i.e., including hallways, corridors, doorways, stairwells, access/egress points, locker rooms, etc.) that are suspected to be attributable to direct contact transfer by site workers and/or contaminated equipment (i.e., workers boots, tracking, dermal contact, potential

equipment staging areas [PCB-containing electrical equipment], etc. representing a historical tracking scenario).

Materials classified as PCB Remediation Waste based on the findings of this investigation are depicted on Plan Sets 3 through 7. As depicted on these plans, the limits of areas classified as PCB Remediation Waste were defined as follows:

- Either by extending, where possible, from the initial sampling point in all four directions (i.e., the "area of inference") to the nearest sampling point exhibiting PCB concentrations less than 1 mg/kg; or
- If extending to the nearest sampling point exhibiting PCB concentrations less than 1 mg/kg is not feasible, post-removal verification samples will be collected at the limit of remediation/removal area to confirm that no concentrations in excess of 1 mg/kg remain.

As detailed in Section 7.1, where applicable, following the completion of the proposed PCB Remediation Waste removal activities, post-removal verification sampling will be conducted in accordance with the requirements of 40 CFR 761 Subpart O to verify the completion of cleanup activities at AOC-1 and AOC-2. PCB Remediation Waste removal activities will not be considered complete until verification sampling confirms that no PCB concentrations in excess of 1 mg/kg remain within the PCB Remediation Waste removal areas.

AOC 1: PCB Remediation Waste - Northern Portion of Third Floor Hallway

Laboratory analytical results indicated that 67 of the 421 discrete concrete and/or brick floor/ceiling/wall samples collected as part of the characterization activities contain concentrations of PCBs in excess of 1 mg/kg, with the highest detected concentration of 27,700 mg/kg located at one location associated with an unpainted concrete floor located in the northern portion of the Third Floor Hallway, as depicted in Figure 5B. The highest PCB concentrations were generally observed within a portion of the northern end of the third-floor East Hallway. No evidence of a release of OHM (i.e., staining, discoloration, or other visual evidence) was observed by Coneco within the unpainted concrete floors within the northern end of the third-floor East Hallway. No electrical equipment is currently present in this area and no records indicating the presence of historical equipment or equipment storage within this area are available; therefore, the PCB source cannot be definitively determined. Based on interviews with TNEC personnel, the area was reportedly used as a workshop for equipment repairs, and therefore temporary storage of potentially oil-containing equipment and spillage from said equipment is the suspected to be the source of the PCB concentrations identified. Therefore, PCB concentrations identified in media such as paint, concrete, and brick, which are located in the northern portion of the Third Floor Hallway are considered to represent PCB Remediation Waste, as the source of the PCBs may have been attributable to a historical, liquid release(s) of PCBs.

The location of the materials classified as PCB Remediation Waste within the Third Floor Hallway is depicted in Figure 5D. Descriptions of the respective areas are outline below:

- PCB Remediation Waste Third Floor Hallway Floors
 - PCB concentrations identified in portions of the concrete floor in this area extend beyond 4 inches in depth (below the floor surface), the maximum sampling depth. PCBs concentrations associated with two concrete samples, identified as ICS-02-18 and ICS-02-19, collected from the ceiling located on the second-floor (situated directly below the collocated concrete sample third floor) indicate that PCB concentrations have penetrated the entirety of the concrete slab at this specific location. Therefore, the entire thickness of a portion of the concrete floor slab is characterized as PCB Remediation Waste, as depicted in Figure 4D and 5D.
 - Paint and concrete pre-characterization and delineation sampling associated with the upper portions of the second-floor walls, located immediately beneath the concrete floor slab (area with highest PCB results), did not identify PCB concentrations in excess of 1 mg/kg, indicating that PCB concentrations did not penetrate through the concrete slab and impact the second-floor walls.
 - Lateral surficial pre-characterization and delineation concrete sampling was conducted throughout the Third Floor. Depth delineation sampling conducted at select locations determined that PCBs in excess of 1 mg/kg, with the exception of the above detailed portion of the concrete floor slab, extend to a maximum depth of approximately 1 inch below grade on the concrete floors associated with the Third Floor Hallway.
- PCB Remediation Waste Third Floor Hallway Walls and Ceilings
 - PCB concentrations in paint samples collected from the northern portion of the Third Floor Hallway are on average higher than other paint samples collected from other rooms in the Control House. As detailed in Section 6.1, the highest PCB concentrations in paint and concrete were found at the northern portion of the Third Floor Hallway and the source of the PCBs may have been attributable to a historical, liquid release(s) of PCBs. Therefore, paint located within the northern portion the Third Floor Hallway (including portions of the second-floor Office 1 ceiling situated directly below the hot spot on the northern portion of the Third Floor Hallway) containing PCB concentrations equal to or in excess of 1 mg/kg is characterized as PCB Remediation Waste.
 - Based on sampling conducted to date, no concentrations of PCBs were identified in excess of 1 mg/kg (with the exception of brick samples BR-03-01 and BR-03-09 discussed below) in substrate (brick and/or concrete block located beneath the paint) samples collected from the walls and ceilings of the Third Floor Hallway. Therefore, Coneco is of the opinion that significant migration of PCBs associated with historical releases or tracking (i.e., from floor areas with identified PCB Remediation Waste), and/or leaching of PCBs from a manufactured product (e.g., paint, caulk, etc.) did not appreciably occur in the underlying wall substrate (concrete or brick).

- Two brick samples, BR-03-01 and BR-03-09, collected from a wall on the northern portion of the Third Floor Hallway were found to contain concentrations of PCBs equal to or in excess of 1 mg/kg. The brick associated with the samples is covered by paint containing PCB concentrations greater than 50 mg/kg (BR-03-01) or approaching 50 mg/kg (BR-03-09). The detected PCB concentrations in the brick substrate may be attributable to a liquid release or tracking of PCBs, or the overlying paint may have been manufactured with PCBs (PCB Bulk Product) which migrated/leached into the brick substrate. However, as indications of a historical release of PCBs have been identified in the northern portion of the Third Floor Hallway, painted brick (including the brick substrate) in this area containing PCBs at concentrations equal to or in excess of 1 mg/kg will be characterized as PCB Remediation Waste.
- The extent of PCB Remediation Waste in the walls and ceilings of the northern portion of the Third Floor Hallway and second-floor Office 1 is depicted in Figures 4D and 5D.

AOC 2: Remaining Materials Classified as PCB Remediation Waste

PCBs identified in excess of 1 mg/kg in high traffic areas (i.e., including hallways, corridors, doorways, stairwells, access/egress points, locker rooms, etc.) that are suspected to be attributable to direct contact transfer by site workers and/or contaminated equipment (i.e., workers boots, tracking, dermal contact, potential equipment staging areas [PCB containing electrical equipment], etc. representing a historical tracking scenario). Therefore, they are considered to represent PCB Remediation Waste.

- Painted Steel Stairwells, Storage Cabinets, Doors, and Handrails
 - Paint samples containing PCB concentrations in excess of 1 mg/kg include samples collected from high contact painted steel stairwells, storage cabinets, doors, and handrails. While paint located on these materials could be considered to represent PCB Bulk Product Waste (or Excluded PCB Product if PCB concentrations are less than 50 mg/kg), it is possible that the PCB concentrations are the result of tracking associated with a direct contact transfer of PCBs, or via a liquid release of PCBs. Paint samples collected from steel stairwells, storage cabinets, doors, and handrails represent high contact surfaces for site workers in the Control House. Therefore, in order to streamline the demolition process, all painted steel stairwells, storage cabinets, doors (including door frames), and handrails are therefore conservatively considered to represent PCB Remediation Waste.
- Select Unpainted Concrete Surfaces
 - The presence of PCBs in select portions of the unpainted concrete floors and/or stairwells associated with high traffic areas (i.e., hallways, corridors, doorways, stairwells, access/egress points, locker rooms, etc.) within the Control House indicate there was potentially tracking and/or historical releases in the Control House. Therefore, portions of concrete floors

containing PCBs in excess of 1 mg/kg are therefore considered to represent PCB Remediation Waste.

- As these portions of concrete floors and/or stairwells containing PCBs in excess of 1 mg/kg are unpainted, the source of the PCBs is not related to a manufacturing process and therefore cannot be characterized as PCB Bulk Product Waste.
- Miscellaneous Manufactured Materials (i.e., rubber floor matting and table covers)
 - The bulk material samples representing rubber floor matting on the second floor of the Control House within Office 1 (2003A/B/C), Office 2 (2012A/B), Office 3 (2014), and Room B: Main Switchboard Room (2016A/B/C) contained PCB concentrations ranging from 1.5 to 42.3 mg/kg. Additionally, the bulk material samples representing table coverings on the second floor of the Control House within Office 1 (2001) and in Room B: Main Switchyard Room (2015) contained PCB concentrations of 6.4 and 19.9 mg/kg, respectively.
 - Based on the variability of concentrations among these samples, the locations of the floor matting in areas of high foot traffic, and the rubber floor matting and table coverings representing high contact potential, these materials are considered PCB Remediation Waste due to the potential for tracking associated with historical releases in the Control House.
 - Mastic was not observed beneath the rubber matting in the sampling locations. If mastic is discovered during demolition activities, a minimum of three samples will be collected for laboratory analysis for PCBs. Six concrete floor samples, identified as ICS-02-01, ICS-02-04, ICS-02-23, ICS-02-24, ICS-02-25, and ICS-02-27, were collected from beneath rubber floor matting. Laboratory analytical results for PCBs of these samples ranged from below the laboratory reporting limit of 0.1 mg/kg to 0.3 mg/kg; therefore, it is Coneco's opinion that unpainted concrete floors located beneath rubber floor matting have not been impacted by PCBs as a result of leaching from the rubber floor matting and are not characterized as PCB Remediation Waste.
 - Although PCB concentrations identified within these materials could be related to the manufacturing process and therefore represent Excluded PCB Products, due to the above detailed variability in PCB concentrations and potential for historical tracking of liquid PCB releases, these materials are conservatively classified as PCB Remediation Waste.

6.2 PCB Bulk Product Waste

PCB Concentrations in excess of 50 mg/kg

The majority of the paint samples collected throughout the Control House were found to contain PCB concentrations in excess of 1 mg/kg. Of the 268 paint samples collected, 243 samples contain PCB concentrations equal to or in excess of 1 mg/kg but less than 50 mg/kg. A total of ten paint samples containing PCB concentrations in excess of 50 mg/kg, which are detailed below:

- Paint samples PS-71, PS-80, PS-81, PS-82, PS-104, PS-228, and PS-252 contained PCBs ranging from 51.0 mg/kg to 489.0 mg/kg. These samples represent various color paints within the Third Floor Hallway (i.e., AOC-1).
- Paint samples PS-39, PS-56, and PS-66 contained PCBs ranging from 84.0 mg/kg to 138.0 mg/kg. These samples represent black and/or green paint present on metal handrails or doors within the Control House (i.e., AOC-2).

Based on the location of these ten paint samples in relation to the above detailed AOC-1 and AOC-2, these painted materials are conservatively considered to potentially be the result of a historical liquid release of PCBs and/or tracking and are considered PCB Remediation Waste.

<u>PCB Concentrations equal to or in excess of 1 mg/kg but less than 50 mg/kg: Painted</u> <u>Materials</u>

Based on field observations and analytical results for the paint sampling program described herein, Coneco is of the opinion that identified concentrations of PCBs equal to or in excess of 1 mg/kg but less than 50 mg/kg collected from paint within the Control House (except as referenced in AOC-1 and AOC-2 above) are the result of manufacturing processes and not the result of a historical release of PCBs, which would classify the paint as PCB Remediation Waste. Moreover, as paint samples contain PCBs equal to or in excess of 1 mg/kg but less than 50 mg/kg, and thus could represent Excluded PCB Products, and since paint samples generally represented multiple layers of paint that could not be physically segregated and analyzed individually, Coneco is conservatively managing these materials as PCB Bulk Product Waste containing PCBs in excess of 50 mg/kg in consideration of the potential for dilution. Materials managed as PCB Bulk Product Waste are proposed for disposal at a RCRA Subtitle D landfill permitted to accept such waste (i.e., Waste Management Turnkey or similar) in accordance with 40 CFR 761.62(b). Coneco has utilized the following lines of evidence to support this conclusion:

- No staining, discoloration, or visual evidence of a liquid release from oil-filled electrical equipment was observed on the painted surfaces. Adjacent samples of other collected media did not contain PCBs greater than 1 mg/kg.
- To evaluate for the potential for PCB contamination in paint relating to indoor air/vapor/dust and the potential for porous surfaces to act as sinks for airborne PCBs, a total of 21 PCB wipe samples were collected from various porous surfaces throughout the Control House. Wipe samples were collected to evaluate if painted surfaces may have been impacted by a liquid release of PCBs and if PCBs had migrated throughout the interior of the Control House via particulates or vapors.
- Three additional wipe samples were collected within the non-porous interior of the air handlers associated with the heating and ventilation system for the Control House.
- Results of the wipe sample analysis indicated that 22 of the 24 samples did not contain concentrations of PCBs above the laboratory detection limit (0.5 or 1.0 micrograms per 100 square centimeters). The remaining two samples contained PCB concentrations of 1.4 and 5.8 micrograms per 100 square centimeters, respectively,

which are below the decontamination standard of 10 micrograms per 100 square centimeters listed in 40 CFR 761.79(b)(3)(i)(A) which was used as reference value for surficial PCB contamination. Based on these results, PCB contamination of indoor air or other surfaces resulting from airborne dust or vapors does not appear to have occurred in association with a historical presence of PCBs or suspected release(s) within the Control House.

- PCBs were not present at concentrations equal to or greater than 50 mg/kg in the paint chip samples outside of AOC-1 and AOC-2. The paint chip samples contain PCBs at comparable levels among samples of like types and locations. In the case of a release, one would expect to find greater concentrations of PCBs in select areas, indicating proximity to a potential release source. The relative consistency of the detected PCB concentrations amongst paint samples of the same paint type does not suggest such a release scenario.
- In the event of a liquid release, PCB concentrations would be expected to vary across the impacted surface based on the distance from the point of release. PCBs would also likely impact only one side of the physical obstacle (i.e., a wall). Coneco's assessment of painted materials included the collection of paint samples from a variety of locations within the Control House (different directional walls within the same room, varying heights, different rooms containing the same paint types, multiple locations along open walls and corridors with no obstructions) to evaluate the variation, if any, of PCB concentrations across the surfaces. Based on the analytical data for the paint samples, there is no apparent directionality to the detected concentrations of PCBs within the control house first, second, fourth, and fifth floors. For example:
 - Samples PS-143, PS-148, and PS-154, representing dark green paint collected from the first-floor lower wall of the east hallway of the cable vault, exhibited similar PCB concentrations (ranging from 3.1 mg/kg to 4.1 mg/kg).
 - Samples PS-126 through PS-129, representing dark green paint collected from three different walls of the first-floor Room 9 (Locker and Toilet Room), exhibited similar PCB concentrations (4.2 mg/kg to 5.5 mg/kg).
 - Samples PS-113, PS-115, and PS-117, representing white paint collected from the first-floor walls of Room 2, Room 7, and Room 9, respectively, exhibited similar PCB concentrations (ranging from 4.2 mg/kg to 5.8 mg/kg).
- In the event of a liquid release, PCB concentrations would be expected to vary widely at different heights along an impacted surface, with higher concentrations expected at the height closest to the point source of the release. Coneco's assessment of painted materials included the collection of paint samples from varying heights (heights ranging from 1 to 9 feet above the respective floor grade) along the same vertical axis at pre-determined select interior walls within the Control House. Based on the analytical data for the paint samples, PCB concentrations are similar in paint chip samples collected at varying heights at certain sampling locations, indicating that the PCB concentrations are not likely the result of a liquid release and/or tracking/contact. For example:

- Samples PS-203 through PS-206, collected from the fourth-floor Room E wall from 1 foot to 9 feet above the floor surface exhibited similar PCB concentrations for each respective paint type. PCB concentrations ranged from 2.0 mg/kg to 2.1 mg/kg for the lower portion of the wall (dark green paint) and 1.1 mg/kg to 1.2 mg/kg for the upper portion of the wall (white paint underlain by yellow paint). It would be expected that the paint samples collected from the same wall (at various heights from the floor) would contain a variable range of PCB concentrations if the paint had been impacted by a historical release of liquid PCBs.
- Bulk material samples collected from the Control House for PCB analysis consisted of caulk, rubber floor mats, window glazing, tar paper, conduit sealants, gaskets, weather stripping, table coverings, floor tile, acoustical wall tile, plywood, roofing materials, and cove base moldings. Laboratory analytical results indicate that the collected bulk material samples contain concentrations of PCBs ranging from below the laboratory detection limit (less than 0.1 mg/kg) to 42.3 mg/kg. No bulk material samples contained PCB concentrations greater than 50 mg/kg.
 - Based on the locations of the remaining bulk materials (i.e., excluding bulk materials classified as PCB Remediation Waste associated with AOC-2) found to contain PCBs at concentrations equal to or greater than 1 mg/kg and less than 50 mg/kg, it is Coneco's opinion that the identified PCB concentrations are attributable to the manufacturing process, due to the low potential for direct impact or tracking to these materials associated with a release of PCBs.
 - Additionally, the locations, directionality, and heights of the identified bulk materials were assessed via the collection of multiple homogenous samples from different locations, where feasible. Coneco did not identify any significant discrepancy between PCB concentrations in the duplicate samples. Based on the above lines of evidence, Coneco has proposed that these remaining bulk materials conservatively be managed as PCB Bulk Product Waste, to streamline the demolition process.

Based on the above multiple lines of evidence, it is Coneco's opinion that paint types and bulk materials containing PCBs at concentrations equal to or greater than 1 mg/kg and less than 50 mg/kg (except as previously categorized as PCB Remediation Waste in Section 6.1) were not impacted by a spill, release, tracking/contact, or other unauthorized disposal release of PCBs. Rather, these materials comprise products that were contaminated with Aroclor or other PCB materials from historic PCB uses in manufacturing. Therefore, with the exception of the northern portion of the Third Floor Hallway (AOC-1) and the high contact surfaces (AOC-2) detailed above, painted surfaces associated with the interior and exterior of the Control House are proposed to be managed as PCB Bulk Product Waste, as defined at 40 CFR 761.3.

In addition to concentrations of PCBs, paint samples from each of the five floors contain concentrations of cadmium, chromium, and lead. The presence of lead, cadmium, and chromium in certain PCB Remediation Wastes and PCB Bulk Product Waste requires that

this waste also be managed in accordance with applicable state and federal regulations pertaining to the presence of heavy metals.

An ACM survey was performed for the Control House during bulk material sampling activities. Laboratory analytical results for the bulk material samples submitted for asbestos analysis indicate that ACM is present in select portions of the Control House. Therefore, ACM will be removed and properly disposed of by a trained and licensed asbestos abatement contractor in accordance with applicable state and federal regulations and requirements. Identified ACM that is comingled with PCB Remediation Waste will also be managed and disposed of as PCB Remediation Waste as a greater than or equal to 50 mg/kg PCB waste in accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(iii). Bulk materials with identified ACM that also contain regulated concentrations of PCBs are included on Table 5 with associated waste classifications.

6.3 Excluded PCB Products and Non-TSCA Regulated Materials

Based on initial assessment activities, Coneco previously classified select portions of building materials associated with the Control House as Excluded PCB Products. However, following the performance of further sampling activities and regulatory correspondence, these select portions of building materials are proposed to be managed as PCB Bulk Product Waste to streamline the demolition and disposal process and they are no longer proposed for management as Excluded PCB Products.

Based on the analytical results from the wipe sampling program described herein, the unpainted, non-porous steel heating and ventilation system components for the Control House are not impacted by PCBs. Therefore, these portions of unpainted steel associated with the heating and ventilation system for the Control House are classified as non-TSCA regulated materials. Additionally, as detailed in Section 2.4, oil-filled electrical equipment currently present within the Control House will be assessed and removed prior to demolition in accordance with applicable state and federal regulations and is therefore not included in the waste classifications detailed in Section 6.0.

Sampling of infilled material (i.e., trap rock and soil) located within the Turbine Room at the Control House, as detailed in Section 4.4, did not identify concentrations of PCBs in excess of 1 mg/kg. Therefore, Coneco has classified this material as a non-TSCA regulated material. This fill material will be removed to a depth of approximately 4 feet below existing exterior surface grade during Control House demolition activities and properly stockpiled at the Property in accordance with the RIDEM-approved RAWP for the Property. Appropriate characterization samples will then be collected by TNEC and/or a subcontractor to determine if the material is appropriate for re-use at the Property as part of redevelopment activities or requires off-Site disposal/recycling. Should PCBs be detected in the stockpile characterization samples, the analytical results will be communicated to EPA and additional assessment and/or disposal of said material may be necessary to further classify the material in accordance with 40 CFR 761.

As shown in Plan Sets 3 through 7, the entirety of the Control House has been classified for disposal as either PCB Remediation Waste or managed as PCB Bulk Product Waste, with the exception of the above detailed infilled material located within the Turbine Room.

7.0 PROPOSED PCB DISPOSAL PLAN

Select materials within the Control House (i.e., concrete, brick, select painted materials, and other bulk materials) contain concentrations of PCBs equal to or greater than 1 mg/kg, representing PCB Remediation Waste or PCB Bulk Product Waste, therefore, remedial actions are proposed to properly dispose of these materials and achieve the cleanup levels established in 40 CFR 761.61(a)(4). This cleanup level also meets the Method 1 objectives for PCBs established in Rule 1.9.2 of the <u>Remediation Regulations</u>.

In addition, asbestos was identified in select materials throughout the Control House. The identified ACM at the Control House must be removed and properly disposed of by a trained and licensed asbestos abatement contractor. The contractor shall prepare and submit an Asbestos Abatement Plan to the Rhode Island Department of Health (RIDOH) for approval prior to the initiation of asbestos abatement activities. Following approval of the Asbestos Abatement Plan, notification that abatement is to begin must be provided to the RIDOH and the EPA at least ten business days prior to the onset of abatement activities. As detailed in Section 6.2, select materials identified as ACM have also been characterized as PCB Remediation Waste and require disposal in accordance with 40 CFR 761, as detailed in Table 5. Prior to the removal of materials characterized as PCB Remediation Waste, the contractor shall remove materials characterized as ACM which are not otherwise characterized as PCB Remediation Waste.

The following sections outline the proposed Self-Implementing Cleanup of PCB-impacted materials.

7.1 Cleanup Standards and PCB Remediation Waste Removal

The cleanup level specified at 40 CFR 761.61(a)(4)(i) for unrestricted use is less than or equal to 1 mg/kg. Accordingly, building materials containing total PCB concentrations in excess of 1 mg/kg (characterized as PCB Remediation Waste [as detailed in Section 6.1]) are proposed to be removed for disposal as PCB Remediation Waste containing greater than or equal to 50 mg/kg PCB waste in accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(iii).

Coneco will provide oversight for the removal of materials classified as PCB Remediation Waste (i.e., select areas of concrete floors, concrete and masonry walls, bulk materials, as well as painted steel structures) within the Control House. The proposed removal areas are depicted in Plan Sets 3 through 7. Note, an inventory of non-building materials present in the Control House that are not depicted on the Plan Sets (i.e., cabinets, tables, panels, etc.), including locations, quantity, and characterization for handling and disposal purposes, is provided as Table 9. Additionally, note that oil-filled electrical equipment currently present at the Site is not included in waste classifications proposed in this submittal. MODF contained within these pieces of electrical equipment will be appropriately sampled and PCB Articles, if present, as defined in 40 CFR 761.3, will be appropriately disposed of in accordance with state, federal, and local regulations. As depicted in the PCB Removal Plan Set, remedial activities will include PCB-impacted material removals to variable depths and will be conducted as follows:

- 1. Painted steel and bulk materials that have been classified as PCB Remediation Waste, (i.e., painted stairwells, painted steel storage cabinets, painted doors, painted handrails, floor mats, and select table covers associated with AOC-2 [as detailed in Section 6.1]) will be removed in their entirety and disposed of as PCB Remediation Waste. Therefore, no verification sampling will be performed at these locations following the removal activities, as no substrate will remain following removal.
- 2. The entire thickness of a portion of the concrete floor slab associated with the northern portion of the Third Floor Hallway will be removed in its entirety (i.e., a portion of AOC-1). Therefore, no verification sampling will be performed at that location as no substrate will remain.
 - a. The selected environmental contractor may saw-cut the entire thickness of the concrete slab to ensure that the concrete debris can be removed intact, eliminating the potential for debris, dust, and any other waste material to impact areas outside of the removal area.
 - b. Throughout the performance saw-cutting activities, an appropriate volume of water will be applied to applicable materials (i.e., concrete) to minimize the amount of dust generated. Water, if generated, will be collected, and contained in appropriate Department of Transportation (DOT)-approved containers for proper off-Site disposal.
 - c. Should complete removal via saw cutting not be feasible, the selected environmental contactor may also install appropriate containment beneath the concrete floor slab associated with the northern portion of the Third Floor Hallway (i.e., lumber false floors or similar) and polyethylene sheeting arranged such that concrete debris is contained within the work area.
 - d. During saw-cutting and/or concrete breaking operations, a High-Efficiency Particulate Arrestance (HEPA) filter-equipped vacuum will be operated continuously to collect and prevent migration of the concrete slurry and water generated during this operation. Additional containment measures are discussed in Section 7.3. Waste generated within the vacuum will be properly disposed of, as detailed in Section 7.4.
- 3. Additional areas of concrete floors, concrete and brick masonry walls classified as PCB Remediation Waste (i.e., paint and/or concrete and masonry walls associated with AOC-1 and AOC-2 as detailed in Section 6.1) will be removed and/or scarified to the depths proposed as depicted in Plan Sets 3 through 7.
 - a. The dimensions (footprint/area) and depths associated with the proposed removal areas were determined based on the findings of the investigation activities detailed previously in Sections 3.0 and 4.0.

b. The vertical extent of PCB impacts within these areas has not been fully delineated. However, post-removal verification sampling will be conducted to ensure that no concentrations of PCBs in excess of applicable cleanup level of 1 mg/kg, in accordance with 40 CFR 761.61(a)(4)(i)(A), remain within AOC-1 or AOC-2 following removal activities. The proposed locations of post-removal verification samples are depicted in Plan Sets 3 through 7. Discrete verification samples will be collected from the proposed removal areas in accordance with the requirements of 40 CFR 761 Subpart O to verify the completion of cleanup activities at AOC-1 and AOC-2.

The above-described materials will be removed for proper off-site disposal as part of the Self-Implementing Cleanup, pursuant to 40 CFR 761.61(a). Specific demolition and removal practices will be detailed in the contractor work plan to be prepared by the selected environmental services contractor and provided to EPA for review and approval prior to the initiation of PCB Removal activities. The contractor work plan may include the use of heavy equipment, power tools, and/or hand tools to properly size the materials identified PCB Remediation Waste to be removed in whole sections (to the extent feasible) to minimize dust generation. A steel cut-off saw will be used to cut steel rebar (which may be present within the concrete) as needed. This material will then be placed into DOT-approved containers for subsequent off-site transport and disposal at an approved PCB disposal facility, as detailed in Section 7.4. The contractor work plan shall include drawings detailing logistics of planned remedial activities, staging areas, and waste trucking.

7.2 PCB Bulk Product Waste Removal

The Control House is scheduled for demolition following the recent completion of upgrades to the existing substation at the Property, including the construction of a replacement control house. TNEC is expected to award the project to a contractor in Summer 2023 with demolition planned for Winter 2023/24. Remaining building materials not otherwise classified as PCB Remediation Waste (as detailed in Sections 6.1 and 7.1) or non-TSCA regulated materials (as detailed in Section 6.3) are proposed to be managed as PCB Bulk Product Waste (as detailed in Section 6.2) and, for select materials, ACM and PCB Remediation Waste (as detailed in Table 5). The Control House is expected to be demolished in its entirety as PCB Bulk Product Waste, with the exception of the materials identified as PCB Remediation Waste and/or ACM waste, as detailed in Section 6.1.

Demolition debris proposed to be managed as PCB Bulk Product Waste and will be consolidated on-Site and staged prior to proper off-Site disposal. Debris stockpile areas will consist of two layers of 6-mil polyethylene sheeting on the ground surface and a layer of 6-mil polyethylene sheeting atop the PCB Bulk Product Waste stockpiles. The polyethylene sheeting will be arranged such that the potential for debris, dust, and any other waste material to impact areas outside of the stockpile limits will be eliminated. Continual monitoring of the condition of the polyethylene sheeting will be conducted during work. Polyethylene sheeting will be secured and properly weighed down at the end of each workday. The stockpiled PCB Bulk Product Waste debris will be periodically loaded into DOT-approved trucks and disposed of at a RCRA Subtitle D landfill permitted to accept such waste (i.e., Waste Management Turnkey or similar).

The Control House is expected to be demolished in its entirety with the exception of the concrete Control House foundation which will be removed to approximately 4 feet below existing exterior grade. As discussed in Section 2.2, the Turbine Room has been infilled with soil to approximately exterior surface grade and covered with approximately 4 inches of trap rock (crushed stone). Based on historical drawings provided by TNEC, a concrete slab floor is assumed to be present below the infill material (in the Turbine Room). The existing ground floor level of the Turbine Room was previously lower than its current elevation. A partial basement was historically located at the east edge of the Control House at a depth consistent with the adjacent western basement (i.e., Rooms 1 through 8), approximately 6 feet below exterior surface grade. To facilitate the removal of the Control House foundations, infilled material within the Turbine Room will also be removed to a depth of approximately 4 feet below existing exterior surface grade.

Portions of the building foundation located greater than 4 feet below exterior grade are proposed to remain in place following demolition activities. Infilled material present greater than 4 feet below grade will also be removed to facilitate access to paint on the remaining foundations, where present, which will be removed such that only bare substrate (i.e., masonry or concrete) remains prior to backfilling. Following the removal of paint from portions of the Control House foundation that are proposed to remain in place, post-removal verification sampling in accordance with 40 CFR 761 Subpart O will be conducted to ensure that bare substrate (i.e., masonry or concrete) at the Site does not contain PCBs in excess of 1 mg/kg. An example of the proposed post-removal verification sampling approach that will be utilized for remaining subsurface foundations is depicted in Figure 3K.

Based on analytical results for samples collected from the accessible portions of concrete foundations within the Turbine Room to date, the concrete surfaces associated with the areas identified as Room 1 through Room 8, and soil and trap rock present within the Turbine Room, TNEC does not anticipate that the portions of the concrete building foundation that have not yet been assessed within the Turbine Room (i.e., infilled material, concrete floor slab under the infilled area) have been impacted by a release of PCBs. A total of six test pits are proposed in the portion of the basement currently rendered inaccessible due to the presence of the infilled material and safety considerations previously detailed in Section 2.2. Discrete samples of concrete will be collected from each of these six test pit locations and analyzed for PCBs to ensure that bare substrate (i.e., masonry or concrete) at the Site does not contain PCBs in excess of 1 mg/kg. Proposed test pit locations are shown in Figure 3F. Should PCBs in excess of 1 mg/kg be identified in the portions of the remaining Control House walls or floors (i.e., masonry or concrete) proposed to remain in place at the Site, TNEC will notify RIDEM and EPA and said conditions will be addressed in appropriate future regulatory submittals and/or correspondence.

As part of the RIDEM-approved RAWP for the Property, the Control House footprint (including the portions of the building foundation that are proposed to remain in place) and surrounding area will be covered by an engineered cap following demolition of the remainder of the structure. Following the completion of demolition activities, including the removal of infill material and foundations to approximately 4 feet below existing exterior surface grade, TNEC or their subcontractor will install an engineered cap (i.e., a geotextile membrane at a depth of approximately 4 feet below the existing grade) and construct a subsurface containment wall to mitigate potential migration of NAPL to the Seekonk River.

Conditions at the Site represent "Low Occupancy" usage as defined at 40 CFR 761.3. No individuals are present at the Site for more than 335 hours per calendar year. Access to the Substation is under the control of TNEC and is restricted to authorized personnel and locked and gated chain-link fencing surrounds the Substation (the fencing will remain for the foreseeable future). As part of the RIDEM-approved RAWP detailed in Section 2.2, an ELUR will be recorded for the entire Property (including the Site and area of the Control House) to prevent human exposure to impacted soil and groundwater and limit future use of the Property. Should PCBs in excess of 1 mg/kg be identified in the portions of the remaining Control House walls or floors (i.e., masonry or concrete) proposed to remain in place at the Site, TNEC will notify RIDEM and EPA and said conditions will be addressed in appropriate future regulatory submittals and/or correspondence which may include the modification of the above detailed ELUR and proposed engineered cap to be 40 CFR 761.61(a)(8) complaint, pending review and approval by RIDEM and EPA.

7.3 Containment Measures

Environmental services personnel will conduct PCB Remediation Waste remedial activities such that the potential for dust, water, or other potential waste to impact areas outside of AOC-1 and AOC-2 is mitigated. Specific containment measures will be detailed in the contractor work plan and Asbestos Abatement Plan of the selected environmental services contractor and provided to EPA for review and approval prior to the initiation of PCB Removal activities.

PCB Remediation Waste Containment Measures

- The portions of the Control House which contain PCB Remediation Waste will be clearly marked and isolated during the performance of demolition activities. The perimeter of these work areas will be delineated by physical barriers and/or visual cues (e.g., caution/danger tape and construction cones) to ensure proper waste stream management.
- Signage (clearly stating that unauthorized persons shall not enter the area) will be posted on temporary barricades at each potential access point (a PCB "M_L Mark" will also be posted at these locations).
- A raised berm will be constructed at the perimeter of the work area and lined with 6mil reinforced polyethylene sheeting to prevent debris from escaping the individual work areas associated with AOC-1 and AOC-2 and to protect areas outside of these work areas.
- Polyethylene sheeting with plywood protection and critical barriers will be installed on the materials that are not designated as PCB Remediation Waste to prevent crosscontamination during the PCB Remediation Waste removal process.
- For each work area (associated with AOC-1 and AOC-2), a contaminant reduction zone will be constructed at the entrance to the work area so as to mitigate potential

tracking of contaminants. Within the contaminant reduction zone, Site workers will be required to don and doff personal protective equipment (PPE).

- Dust and debris management will be performed using a combination of dust collection equipment, HEPA filter-equipped tools, HEPA vacuums, and/or prewetting with misting sprayers of water for dust suppression.
- Water volume will be controlled, such that there will be minimal standing or pooling water from this method of dust control. Excess water, if generated during PCB Remediation Waste removal activities, will be collected, and contained in appropriate DOT-approved containers for proper off-Site disposal. HEPA filter-equipped vacuum will be operated on an as needed basis to collect and prevent migration of the concrete slurry and water generated during this operation. A contaminant reduction zone will be established at the entrance to the work area to mitigate the potential tracking of contaminants.

PCB Bulk Product Waste Containment Measures

- Dust and debris management will be performed using a combination of dust collection equipment and/or pre-wetting with misting sprayers of water for dust suppression.
- Water volume will be controlled, such that there will be minimal standing or pooling water from this method of dust control. Excess water, if generated during PCB Bulk Product Waste removal activities, will be collected, and contained in appropriate DOT-approved containers for proper off-Site disposal. A contaminant reduction zone will be established at the entrance to the work area to mitigate the potential tracking of contaminants.

Non-disposable equipment utilized for removal activities will be decontaminated in accordance with 40 CFR 761, Subpart S. Dust, residuals, and disposable equipment will be placed into properly labeled and sealed DOT-approved containers for subsequent off-site transport and disposal at an approved PCB disposal facility.

Removal activities will be conducted within the locked and gated portion of the Property, and security measures will be implemented during non-working hours. Access to the Control House will be limited to TNEC and authorized subcontractors. Personnel performing the remedial activities will have completed the Occupational Safety and Health Administration (OSHA) 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training and/or 8-hour annual refresher course as required.

Real-time total dust particulate monitoring will be conducted outside the work area throughout the duration of remedial activities utilizing visual methods and TSI DustTrak total dust particulate monitors. No visible dust generation will be permitted. Prior to the initiation of the work, a background concentration of total dust particulate will be established outside of the work area. During the performance of the work, total dust particulate concentrations will be continuously monitored upwind and downwind of the work. Total dust particulate readings will be recorded at 15-minute intervals during remedial activities. If the total dust particulate concentrations will be immediately ceased and additional dust mitigation measures will be implemented.

7.4 PCB Waste Disposal

Solid PCB Remediation Waste

Solid PCB Remediation Waste ,(i.e., concrete, brick, select painted materials, and other bulk materials) generated as a result of the proposed cleanup activities will be disposed of in a hazardous waste landfill permitted by the EPA under section 3004 of RCRA or an approved PCB disposal facility. It is anticipated that the solid PCB Remediation Waste will be disposed of at one of the following facilities: US Ecology Wayne Disposal Incorporated, Waste Management Emelle Hazardous Waste Facility, Clean Harbors Grassy Mountain, or similar. TNEC plans to manage and dispose of all PCB Remediation Waste as a greater than or equal to 50 mg/kg PCB waste in accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(iii).

Liquid PCB Remediation Waste

Liquid PCB Remediation Waste which may be generated as a result of decontamination or dust mitigation will be managed and disposed of in accordance with 40 CFR § 761.61(a)(4). Waste will be contained within appropriate DOT-approved containers and transported under Uniform Hazardous Waste Manifests to a facility permitted to accept such waste (i.e., Clean Harbors Deer Park, LLC facility located in La Porte, Texas or similar) for final disposal in a high temperature incinerator.

Solid PCB Bulk Product Waste

Building materials managed and handled as PCB Bulk Product Waste will be disposed of at a RCRA Subtitle D landfill permitted to accept such waste (i.e., Waste Management Turnkey or similar) in accordance with 40 CFR 761.62(b)(1).

7.5 Restoration

Following the completion of the proposed Self-Implementing Cleanup, the area associated with the footprint of the former Control Building will be restored to grade in accordance with the RIDEM-approved RAWP. Remedial actions pertaining to the RIDEM-approved RAWP include the installation of an engineered cap (i.e., a geotextile membrane at a depth of approximately 4 feet below the existing grade), construction of a subsurface containment wall to mitigate migration of NAPL to the Seekonk River, and the recording of an ELUR to limit future uses of the Property.

7.6 Public Notification and Required Permits

This *Final Site Characterization and Self-Implementing Cleanup Plan* has been provided to the EPA Region 1, RIDEM, and the Rhode Island Department of Health. Unless waived by the EPA Regional Administrator, written or 30-day presumptive approval of this Self-Implementing Cleanup Plan is required prior to the initiation of the proposed Self-Implementing Cleanup.

7.7 Schedule

Coneco anticipates the completion of the proposed Self-Implementing Cleanup in accordance with the following schedule:

Self-Implementing Cleanup Schedule				
Activity	Anticipated Date			
Submittal of <i>Final Site Characterization and Self-</i> <i>Implementing Cleanup Plan</i> to EPA Region 1	April 2023			
EPA Region 1 Approval of Proposed Self-Implementing Cleanup	May 2023			
Commencement of Remediation Activities	Summer 2023			
Electrical Outages required for Demolition Activities	December 2023 to March 2024			
Closure Report Preparation	April - May 2024 (pending completion of removal activities)			
Submittal of Closure Report to EPA Region 1	60 days from completion of removal activities			

7.8 Contingencies

If Site conditions differ from those previously observed and a modification in the proposed plan is necessary, TNEC will notify RIDEM and the EPA Regional PCB Coordinator. Based on the magnitude of differing conditions, if identified, TNEC will with either submit an addendum to this Self-Implementing Cleanup Plan and obtain approval to continue cleanup activities associated with the demolition of the Control House such that cleanup levels presented at 40 CFR 761.61(a)(4)(i) are achieved or evaluate the potential need to pursue approval of a Risk Based Disposal in accordance with 40 CFR 761.61(c).

8.0 LIMITATIONS

The information presented by Coneco in this report is based solely on the references cited. Observations were made under the conditions stated. Information provided by subcontractors, federal, state, and local agencies contacted was relied upon as accurate and complete.

With specific regard to Site Characterization sampling, data obtained from specific sampling points may not be wholly representative of the nature of environmental conditions at locations other than the actual test location. Variable conditions may only become evident upon further exploration or future sampling activities. Should additional information become available concerning the Site in the future, that information should be made available to Coneco for review so that the conclusions presented in this report may be modified as necessary.



THIS DOCUMENT IS INTENDED FOR GENERAL PLANNING & INFORMATION PURPOSES ONLY. ALL MEASUREMENTS & LOCATIONS ARE APPROXIMATE.



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Plan Set 3: First Floor Sampling, Characterization, and Remediation Plans







NOTES:

SAMPLES COLLECTED FROM VERTICAL SURFACES ARE DEPICTED BY A HALF SYMBOL. ORIENTATION OF SYMBOL DENOTES THE SIDE OF THE STRUCTURE FROM WHICH THE SAMPLE WAS COLLECTED GREEN SYMBOL INDICATES PCB CONCENTRATIONS <1 MG/KG RED SYMBOL INDICATES PCB CONCENTRATION ≥1 MG/KG

FLOOR





NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES.

EASTERN WALL







PS-159	8'	11.6
PS-160	5'	11.0
PS-161	4'	10.5
PS-162	2'	6.6













SCALE IN FEET



+ ICS-01-51 <0.2 • PS-129 5.5 CONCRETE SAMPLE LOCATION, IDENTIFICATION, AND PCB CONCENTRATION IN MG/KG

PAINT SAMPLE LOCATION, IDENTIFICATION, AND PCB CONCENTRATION IN MG/KG

NOTES:

SAMPLES COLLECTED FROM VERTICAL SURFACES ARE DEPICTED BY A HALF SYMBOL. ORIENTATION OF SYMBOL DENOTES THE SIDE OF THE STRUCTURE FROM WHICH THE SAMPLE WAS COLLECTED

GREEN SYMBOL INDICATES PCB CONCENTRATIONS <1 MG/KG RED SYMBOL INDICATES PCB CONCENTRATION ≥1 MG/KG



NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES.







PS-129 5.5

SCALE IN FEET







PROPOSED POST-REMOVAL PCB VERIFICATION CONCRETE SAMPLE LOCATION



PROPOSED 0.5" DEPTH PCB REMEDIATION WASTE REMOVAL AREA

DOORWAYS CHARACTERIZED AS PCB REMEDIATION WASTE



FLOOR



NORTHERN WALL





ALTHOUGH NOT DEPICTED ON FIGURE 3G, PAINTED STEEL HANDRAILS, PAINTED STEEL STAIRWAYS, AND DOORS (INCLUDING DOOR FRAMES) LOCATED THROUGHOUT THE BUILDING ARE CHARACTERIZED AS PCB REMEDIATION WASTE.

EASTERN WALL



DETAIL PLAN 1



		TOD CONC.
PS-159	8'	11.6
PS-160	5'	11.0
PS-161	4'	10.5
PS-162	2'	6.6

WESTERN WALL









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CONECO

CEILING

FLOOR

SOUTHERN WALL

2' 0 2' Scale in Feet

THE NARRAGANSETT ELECTRIC COMPANY 280 MELROSE STREET PROVIDENCE, RHODE ISLAND WASTE CLASSIFICATION PLAN: FIRST FLOOR DETAIL PLAN 2 NO WTUCKET 1 NO. 107 SUBSTATIO CONTROL HOUSE 6 THORNTON STREET PAWTUCKET, RHODE ISLAND 0 5 王以 も Z 5 0 3/14/23 DATE DRAFTED: WCB CHECKED: MAZ SCALE: 1" = 2' PROJECT NO. 5675.F.101 FIGURE











PROPOSED POST-REMOVAL PCB VERIFICATION CONCRETE SAMPLE LOCATION

PROPOSED PAINT REMOVAL TO BARE SUBSTRATE AS PCB BULK PRODUCT WASTE

COMPLETE REMOVAL AS PCB BULK PRODUCT WASTE



NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES.

REPRESENTATIVE SUBSURFACE REMOVAL PLAN DETAIL



Plan Set 4: Second Floor Sampling, Characterization, and Remediation Plans















NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES.











WASTE CLASSIFICATION PLAN: SECOND FLOOR DETAIL PLAN 1 WTUCKET 1 NO. 107 SUBSTATIO CONTROL HOUSE 6 THORNTON STREET PAWTUCKET, RHODE ISLAND 5

王以 \$ 5

3/14/23

1" = 3'

5675.F.101

PROJECT NO.

FIGURE

Plan Set 5: Third Floor Sampling, Characterization, and Remediation Plans





















NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES. ALTHOUGH NOT DEPICTED ON FIGURE 5C, PAINTED STEEL HANDRAILS, PAINTED STEEL STAIRWAYS, AND

ALTHOUGH NOT DEPICTED ON FIGURE 5C, PAINTED STEEL HANDRAILS, PAINTED STEEL STAIRWAYS, AND DOORS (INCLUDING DOOR FRAMES) LOCATED THROUGHOUT THE BUILDING ARE CHARACTERIZED AS PCB REMEDIATION WASTE.

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		DOOR TO TURBINE ROOM	M -							
ALLWAT SEE FIGURE	56)									
	ROOM C: LOWER OIL CIRCUIT BREAKER AND TRANSFORMER ROOM									
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OPEN TO TURBINE ROOM BELOW



NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES. ALTHOUGH NOT DEPICTED ON FIGURE 5D, PAINTED STEEL HANDRAILS, PAINTED STEEL STAIRWAYS, AND DOORS (INCLUDING DOOR FRAMES) LOCATED THROUGHOUT THE BUILDING ARE CHARACTERIZED AS PCB REMEDIATION WASTE.

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PROPOSED POST-REMOVAL PCB VERIFICATION CONCRETE SAMPLE LOCATION PROPOSED 0.5" DEPTH PCB REMEDIATION WASTE REMOVAL AREA PROPOSED 2" DEPTH PCB REMEDIATION WASTE REMOVAL AREA PROPOSED PAINT REMOVAL TO BARE SUBSTRATE PCB REMEDIATION WASTE REMOVAL AREA PROPOSED ENTIRE CEILING CONCRETE SLAB PCB REMEDIATION WASTE REMOVAL AREA

DOORWAYS CHARACTERIZED AS PCB REMEDIATION WASTE

<u>LEGEND</u>

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Plan Set 6: Fourth Floor Sampling, Characterization, and Remediation Plans





CONCRETE SAMPLE LOCATION, IDENTIFICATION,

		STEEL	WALKWAY	/																					
			1	1	1		PS- 14	-140 9			I		1	- 1		1	 1			1	1	11			
			- ICS- <	04–02 0.1	(	MEZZ OPEN T RC	ZANINE O TURB OOM)	BINE											ICS-04- 0.3	39					
													NO. 2	BUS											
						TRAN	SFER B	US DI	SCONN	IECTS							 	L						т	R،
			ICS-04-4 0.1	40		ROOM	E: TRA	NSFOF T	RMER TRANSF	UPPER FORMER	S				1			04-06 0.1						P	0
			ICS-	04–51		ICS-04 <0.	-52 -	<b> </b>		IC	S-04-5 <0.1	3 –	ICS-04 <0.	↓—54 <i>—</i> ∕ 1	/ <b></b>						)4-55 - ).1		ICS-04-56 <0.1		
ON	INECTS																								
			+	ICS-04 0.1	-42		ROOM I	F: MA	IN BU	S ROOM	1										6–04–1 <0.1	0		I	
ON	INECTS																		WS-04-04 <1.0					BI	75
10.	1 BUS																					Γ			
			+	ICS-04 <0.1	-13			S-04- <0.1	-62 -									↓ ↓	ICS-0 0.	4–45 2			ICS-	-04-63 - <0.1	- 
				SAMPLE PS-20 PS-20 PS-20 PS-20	E ID F D6 5 D4 5 D3 5	HEIGHT 9' 5' 4' 1'	PCB 0 1. 1 2 2	CONC. .2 .1 2.1 .0																	_

OPEN TO TURBINE ROOM BELOW



NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES.





NORTHERN WALL

 ▶ WS-04-01 1.4
 ▶ WPE SAMPLE LOCATION, IDENTIFICATION, AND PCB CONCENTRATION IN ug/100cm²
 ▶ BR-04-02 0.3
 ▶ BRICK WALL SAMPLE LOCATION, IDENTIFICATION, AND PCB CONCENTRATION IN MG/KG
 ▶ DOORWAY
 NOTES:
 SAMPLES COLLECTED FROM VERTICAL SURFACES ARE DEPICTED BY A HALF SYMBOL. ORIENTATION OF SYMBOL DENOTES THE SIDE OF THE STRUCTURE FROM WHICH THE SAMPLE WAS COLLECTED

GREEN SYMBOL INDICATES PCB CONCENTRATIONS <1 MG/KG RED SYMBOL INDICATES PCB CONCENTRATION ≥1 MG/KG

<u>LEGEND</u>

ICS-04-04 <0.1

PS-46 3.4 CONCRETE SAMPLE LOCATION, IDENTIFICATION, AND PCB CONCENTRATION IN MG/KG

PAINT SAMPLE LOCATION, IDENTIFICATION, AND PCB CONCENTRATION IN MG/KG

### WESTERN WALL







WESTERN WALL



	DR/CK							
REVISIONS	DESCRIPTION							
	DATE							
	NO.							
PREPARED FOR:	ELECTRIC COMPANY	280 MELROSE STREET	PROVIDENCE, RHODE ISLAND		DRAMNG:	SAMPLING RESULTS PLAN:	FOURTH FLOOR DETAIL PLAN 1	
PROJECT:		DAWTIICKET 1 NO 107 SUBSTATION	CONTROL HOUSE	6 THORNTON STREET	PAWTUCKET, RHODE ISLAND			
	2		C C N F C C		Engineers & Scientists	4 FIRST STREET, BRIDGEWATER, MASSACHUSETTS 02324	PHONE 508-697-3191 OR 800-548-3355; FAX 508-697-5996 WFRSITE: www.coneco.com	
DATI DRA SCA PRO FIGU	E FTED: LE: JECT RE	NO	WCB	С	HEC	3/ KED 1 567	/14/ : M " =	23 AZ 2' 101
					0		D	Í

SCALE IN FEET



NOTES: SAMPLES COLLECTED FROM VERTICAL SURFACES ARE DEPICTED BY A HALF SYMBOL. ORIENTATION OF SYMBOL DENOTES THE SIDE OF THE STRUCTURE FROM WHICH THE SAMPLE WAS COLLECTED GREEN SYMBOL INDICATES PCB CONCENTRATIONS <1 MG/KG RED SYMBOL INDICATES PCB CONCENTRATION ≥1 MG/KG



NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES.









ALTHOUGH NOT DEPICTED ON FIGURE 6D, PAINTED STEEL HANDRAILS, PAINTED STEEL STAIRWAYS, AND DOORS (INCLUDING DOOR FRAMES) LOCATED THROUGHOUT THE BUILDING ARE CHARACTERIZED AS PCB REMEDIATION WASTE.

STEEL WALKWAY					
MEZZANINE (OPEN TO TURBIN ROOM)	E				
	NO.	2 BUS			
TRANSFER BUS	S DISCONNECTS				TRAN
ROOM E: TRANS	SFORMER UPPER TRANSFORMERS				POTE
NNECTS					
ROOM F:	MAIN BUS ROOM				
NNECTS					BUS
. 1 BUS					
		/ / / / 7	۳	<u> </u>	



PROPOSED POST-REMOVAL PCB VERIFICATION CONCRETE SAMPLE LOCATION



PROPOSED 0.5" DEPTH PCB REMEDIATION WASTE REMOVAL AREA

DOORWAYS CHARACTERIZED AS PCB REMEDIATION WASTE







NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES.

ALTHOUGH NOT DEPICTED ON FIGURE 6E, PAINTED STEEL HANDRAILS, PAINTED STEEL STAIRWAYS, AND DOORS (INCLUDING DOOR FRAMES) LOCATED THROUGHOUT THE BUILDING ARE CHARACTERIZED AS PCB REMEDIATION WASTE.

	DR/CK							
REVISIONS	DESCRIP TION							
	DATE							
	NO.							
PREPARED FOR:	FILECTRIC COMPANY	280 MELROSE STREET	PROVIDENCE, RHODE ISLAND		DRAWING:	WASTE CLASSIFICATION PLAN:	FOURTH FLOOR DETAIL PLAN 1	
PROJECT:		DAWTIICKET 1 NO 107 SUBSTATION	CONTROL HOUSE	6 THORNTON STREET	PAWTUCKET, RHODE ISLAND			
			C C N N C C		Engineers & Scientists	4 FIRST STREET, BRIDGEWATER, MASSACHUSETTS 02324	PHONE 508-697-3191 OR 800-548-3355; FAX 508-697-5996 WEBSITE: www.coneco.com	
DATI DRA SCA PRO FIGU	E FTED LE: JECT RE	0: N	WCB	C	нес	3,/ KED 1 567	/14/ : M " = 5.F.	23 AZ 2' 101

SCALE IN FEE

PROPOSED POST-REMOVAL PCB VERIFICATION CONCRETE SAMPLE LOCATION



PROPOSED 0.5" DEPTH PCB REMEDIATION WASTE REMOVAL AREA







NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES.

ALTHOUGH NOT DEPICTED ON FIGURE 6F, PAINTED STEEL HANDRAILS, PAINTED STEEL STAIRWAYS, AND DOORS (INCLUDING DOOR FRAMES) LOCATED THROUGHOUT THE BUILDING ARE CHARACTERIZED AS PCB REMEDIATION WASTE.





Plan Set 7: Fifth Floor Sampling, Characterization, and Remediation Plans









APPROXIMATE AREA OF BUILDING MATERIALS CLASSIFIED AS PCB REMEDIATION WASTE SOIL CURRENTLY UNCHARACTERIZED PENDING FURTHER ASSESSMENT SUBSEQUENT TO CONTROL HOUSE DEMOLITION APPROXIMATE AREA OF BUILDING MATERIALS CLASSIFIED AS PCB BULK PRODUCT WASTE

DOORWAYS CHARACTERIZED AS PCB REMEDIATION WASTE

<u>LEGEND</u>



NOTE: THE LOCATION AND DIMENSIONS OF THE SITE AND VICINITY FEATURES ARE APPROXIMATE AND BASED UPON A 1941 PLAN TITLED "SWITCH HOUSE GENERAL ARRANGEMENT PLAN" FROM STONE & WEBSTER, INC. NOT TO BE USED FOR ENGINEERING PURPOSES INCLUDING WEIGHT AND/OR VOLUME ESTIMATES.



MEZZANINE



Table 1 - Concrete Floor and Ceiling Analytical Results										
Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclo- 1242	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	
			First	Floor						
ICS-01 (0-0.5)	10/30/2018	11/5/2018	48	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	
ICS-02 (0-0.5)	10/30/2018	11/5/2018	63	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	
ICS-03 (0-0.5)	10/31/2018	11/5/2018	66	< 0.1	< 0.2	0.8	< 0.2	< 0.2	0.8	
ICS-01-01 (0-0.5)	10/1/2018	10/8/2018	54	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-02 (0-0.5)	10/1/2018	10/8/2018	60	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-03 (0-0.5)	10/1/2018	10/8/2018	53	< 0.1	< 0.1	0.1	< 0.1	0.2	0.3	
ICS-01-04 (0-0.5)	10/1/2018	10/8/2018	44	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-05 (0-0.5)	10/1/2018	10/8/2018	55	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-06 (0-0.5)	10/1/2018	10/8/2018	47	< 0.1	0.4	< 0.1	< 0.1	< 0.1	0.4	
ICS-01-07 (0-0.5)	10/1/2018	10/8/2018	47	< 0.1	0.2	0.1	< 0.1	< 0.1	0.3	
ICS-01-08 (0-0.5)	10/1/2018	10/8/2018	47	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-09 (0-0.5)	10/1/2018	10/9/2018	48	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-10 (0-0.5)	10/1/2018	10/9/2018	45	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-11 (0-0.5)	10/1/2018	10/9/2018	55	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-01-12 (0-0.5)	10/1/2018	10/9/2018	73	< 0.1	0.9	0.3	< 0.1	< 0.1	1.2	
ICS-01-13 (0-0.5)	10/1/2018	10/9/2018	64	< 0.1	< 0.1	0.4	< 0.1	< 0.1	0.4	
ICS-01-14 (0-0.5)	10/1/2018	10/9/2018	98	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-15 (0-0.5)	10/1/2018	10/9/2018	92	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-01-16 (0-0.5)	10/1/2018	10/9/2018	46	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-17 (0-0.5)	10/1/2018	10/9/2018	75	< 0.1	0.3	0.2	< 0.1	< 0.1	0.5	
ICS-01-18 (0-0.5)	10/1/2018	10/9/2018	63	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-01-19 (0-0.5)	10/1/2018	10/9/2018	83	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.3	
ICS-01-20 (0-0.5)	10/1/2018	10/9/2018	62	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-21 (0-0.5)	10/1/2018	10/9/2018	56	< 0.1	0.3	0.1	< 0.1	< 0.01	0.4	
ICS-01-22 (0-0.5)	10/1/2018	10/9/2018	52	< 0.1	0.1	< 0.1	< 0.1	< 0.1	0.1	
ICS-01-23 (0-0.5)	10/1/2018	10/9/2018	50	< 0.09	0.2	< 0.09	< 0.09	< 0.09	0.2	
ICS-01-24 (0-0.5)	10/1/2018	10/9/2018	81	< 0.1	0.3	< 0.1	< 0.1	< 0.1	0.3	
ICS-01-25 (0-0.5)	10/1/2018	10/9/2018	60	< 0.1	0.6	< 0.1	< 0.1	< 0.1	0.6	
ICS-01-26 (0-0.5)	10/1/2018	10/9/2018	53	< 0.1	0.2	0.2	< 0.1	< 0.1	0.4	
ICS-01-27 (0-0.5)	10/1/2018	10/9/2018	69	< 0.1	0.2	0.1	< 0.1	< 0.1	0.3	
ICS-01-28 (0-0.5)	10/1/2018	10/9/2018	50	< 0.1	0.1	0.1	< 0.1	< 0.1	0.2	
ICS-01-29 (0-0.5)	10/1/2018	10/9/2018	60	< 0.09	< 0.09	0.3	< 0.09	< 0.09	0.3	
ICS-01-30 (0-0.5)	10/1/2018	10/9/2018	62	< 0.09	0.2	0.2	< 0.09	< 0.09	0.4	
ICS-01-31 (0-0.5)	10/1/2018	10/9/2018	43	< 0.1	0.2	0.2	< 0.1	< 0.1	0.4	
ICS-01-32 (0-0.5)	10/1/2018	10/9/2018	79	< 0.09	0.6	0.3	< 0.09	< 0.09	0.9	
ICS-01-33 (0-0.5)	10/1/2018	10/9/2018	68	< 0.1	8.9	< 0.1	< 0.1	< 0.1	8.9	
ICS-01-33 (0.5-1)	4/28/2021	5/5/2021	101	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-33 (1-2)	4/28/2021	5/5/2021	98	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-33 (2-3)	4/28/2021	5/5/2021	95	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-34 (0-0.5)	10/1/2018	10/9/2018	87	< 0.1	0.2	< 0.1	< 0.1	< 0.1	0.2	
ICS-01-35 (0-0.5)	10/1/2018	10/9/2018	71	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	
EPA Standard									1	

RDEC Notes:

1. Sample ID includes depth in inches collected below grade.

Sample ID includes depth in inches collected below grade.
 Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
 Analytical results are reported in milligrams per kilogram (mg/kg).
 < denotes analyte was not detected above the laboratory detection limit.</li>
 Bold indicates an exceedance of the EPA action level for unrestricted future Site use.
 Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 S Di indicates surrogate recovery percentage diluted below laboratory quantification limit.
 EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.
 Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of

9. Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

10

Table 1 - Concrete Floor and Ceiling Analytical Results										
Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclo- 1242	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	
ICS-01-36 (0-0.5)	10/1/2018	10/9/2018	69	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	
ICS-01-37 (0-0.5)	10/1/2018	10/9/2018	51	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-38 (0-0.5)	10/1/2018	10/9/2018	81	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	
ICS-01-39 (0-0.5)	10/1/2018	10/9/2018	85	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	
ICS-01-40 (0-0.5)	10/1/2018	10/9/2018	101	< 0.09	0.2	0.1	< 0.09	< 0.09	0.3	
ICS-01-41 (0-0.5)	10/1/2018	10/12/2018	37	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-42 (0-0.5)	10/1/2018	10/11/2018	72	< 0.1	0.1	< 0.1	< 0.1	< 0.1	0.1	
ICS-01-43 (0-0.5)	10/1/2018	10/11/2018	65	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-44 (0-0.5)	10/1/2018	10/11/2018	38	< 0.1	0.3	0.3	< 0.1	< 0.1	0.6	
ICS-01-45 (0-0.5)	10/30/2018	11/5/2018	68	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	
ICS-01-46 (0-0.5)	10/31/2018	11/5/2018	70	< 0.2	0.3	0.3	< 0.2	< 0.2	0.6	
ICS-01-47 (0-0.5)	10/31/2018	11/5/2018	71	< 0.2	0.4	0.4	< 0.2	< 0.2	0.8	
ICS-01-48 (0-0.5)	10/31/2018	11/5/2018	70	< 0.2	0.4	0.4	< 0.2	< 0.2	0.8	
ICS-01-49 (0-0.5)	10/31/2018	11/5/2018	76	< 0.2	0.6	< 0.2	< 0.2	< 0.2	0.6	
ICS-01-50 (0-0.5)	10/31/2018	11/5/2018	65	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	
ICS-01-51 (0-0.5)	10/31/2018	11/5/2018	64	< 0.2	< 0.2	< 0.2	<0.2	< 0.2	< 0.2	
ICS-01-52 (0-0.5)	10/31/2018	11/6/2018	77	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1	
ICS-01-53 (0-0.5)	10/31/2018	11/6/2018	59	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-01-54 (0-0.5)	10/31/2018	11/6/2018	52	< 0.1	< 0.1	0.2	<0.1	< 0.1	0.2	
ICS-01-55 (0-0.5)	10/31/2018	11/6/2018	79	< 0.1	< 0.1	0.2	<0.1	< 0.1	0.2	
ICS-01-56 (0-0.5)	10/31/2018	11/6/2018	66	<0.1	< 0.1	0.2	<0.1	< 0.1	0.2	
ICS-01-57 (0-0.5)	10/31/2018	11/6/2018	63	< 0.1	< 0.1	0.5	<0.1	< 0.1	0.5	
ICS-01-58 (0-0.5)	10/31/2018	11/6/2018	67	<0.1	< 0.1	0.2	<0.1	< 0.1	0.2	
ICS-01-59 (0-0.5)	10/31/2018	11/6/2018	33	<0.1	<0.1	0.2	<0.1	<0.1	0.2	
ICS-01-60 (0-0.5)	9/27/2019	10/7/2019	94	< 0.09	< 0.09	0.3	< 0.09	< 0.09	0.3	
ICS-01-61 (0-0.5)	9/27/2019	10/7/2019	91	<0.09	<0.09	0.3	<0.09	<0.09	0.3	
ICS-01-62 (0-0.5)	9/27/2019	10/7/2019	92	< 0.09	<0.09	0.3	<0.09	< 0.09	0.3	
ICS-01-63 (0-0.5)	9/27/2019	10/7/2019	77	< 0.09	<0.1	0.3	<0.1	< 0.09	0.3	
ICS-01-64 (0-0.5)	9/27/2019	10/7/2019	75	< 0.09	< 0.09	0.1	< 0.09	< 0.09	0.1	
ICS-01-65 (0-0.5)	1/3/2020	1/10/2020	93	<0.1	<0.1	0.1	<0.1	< 0.1	0.1	
ICS-01-66 (0-0.5)	1/3/2020	1/10/2020	103	< 0.1	< 0.1	0.3	<0.1	< 0.1	0.3	
ICS-01-67 (0-0.5)	1/3/2020	1/10/2020	88	< 0.1	< 0.1	1.4	<0.1	< 0.1	1.4	
ICS-01-68 (0-0.5)	1/3/2020	1/10/2020	59	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	
ICS-01-69 (0-0.5)	1/3/2020	1/10/2020	81	<0.1	0.4	0.6	<0.1	< 0.1	1.0	
ICS-01-70 (0-0.5)	1/3/2020	1/10/2020	76	<0.1	0.7	1.0	<0.1	<0.1	1.7	
ICS-01-71 (0-0.5)	1/3/2020	1/10/2020	75	<0.1	0.5	0.7	<0.1	<0.1	1.2	
ICS-01-72 (0-0.5)	1/3/2020	1/10/2020	84	<0.1	0.2	< 0.1	0.3	< 0.1	0.5	
ICS-01-73 (0-0.5)	1/3/2020	1/14/2020	51	<0.1	0.2	0.1	<0.1	<0.1	0.3	
ICS-01-74 (0-0.5)	5/28/2020	6/9/2020	83	<0.1	<0.1	0.2	<0.1	<0.1	0.2	
ICS-01-75 (0-0.5)	5/28/2020	6/9/2020	74	<0.1	<0.1	0.2	<0.1	<0.1	0.2	
ICS-01-76 (0-0.5)	5/28/2020	6/9/2020	89	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	
ICS-01-77 (0-0.5)	5/28/2020	6/9/2020	94	<0.1	<0.1	0.3	<0.1	<0.1	0.3	
EPA Standard							,		1	
RDEC									10	

Notes:
I. Sample ID includes depth in inches collected below grade.
2. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
3. Analytical results are reported in milligrams per kilogram (mg/kg).
4. < denotes analyte was not detected above the laboratory detection limit.
5. Padl dilators on gradenage of the PDA cation lawal for unrestricted formers Site use

5. Bold indicates an exceedance of the EPA action level for unrestricted future Site use.

Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 SD indicates surrogate recovery percentage diluted below laboratory quantification limit.

8. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

9. Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

Table 1 - Concrete Floor and Ceiling Analytical Results										
Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclo- 1242	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	
ICS-01-78 (0-0.5)	5/28/2020	6/9/2020	48	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5	
ICS-01-79 (0-0.5)	5/28/2020	6/9/2020	85	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5	
ICS-01-80 (0-0.5)	5/28/2020	6/9/2020	95	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-81 (0-0.5)	5/28/2020	6/9/2020	45	< 0.1	< 0.1	0.6	< 0.1	< 0.1	0.6	
ICS-01-82 (0-0.5)	9/2/2020	9/9/2020	68	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	
ICS-01-83 (0-0.5)	9/2/2020	9/9/2020	77	< 0.1	< 0.1	4.0	< 0.1	< 0.1	4.0	
ICS-01-84 (0-0.5)	9/2/2020	9/9/2020	79	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-85 (0-0.5)	9/2/2020	9/9/2020	59	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5	
ICS-01-86 (0-0.5)	9/2/2020	9/9/2020	67	< 0.1	< 0.1	0.9	< 0.1	< 0.1	0.9	
ICS-01-87 (0-0.5)	4/27/2021	5/5/2021	78	< 0.1	0.3	0.5	< 0.1	< 0.1	0.8	
ICS-01-88 (0-0.5)	4/27/2021	5/5/2021	72	< 0.09	0.2	0.2	< 0.09	< 0.09	0.4	
ICS-01-89 (0-0.5)	4/27/2021	5/5/2021	75	< 0.09	0.2	0.2	< 0.09	< 0.09	0.4	
ICS-01-90 (0-0.5)	4/27/2021	5/5/2021	83	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-91 (0-0.5)	4/27/2021	5/5/2021	84	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-92 (0-0.5)	4/27/2021	5/5/2021	87	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-93 (0-0.5)	4/27/2021	5/5/2021	78	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-94 (0-0.5)	4/27/2021	5/5/2021	65	< 0.1	0.2	< 0.1	< 0.1	< 0.1	0.2	
ICS-01-95 (0-0.5)	4/27/2021	5/5/2021	80	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	
ICS-01-96 (0-0.5)	4/27/2021	5/5/2021	92	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-97 (0-0.5)	4/27/2021	5/4/2021	97	< 0.1	< 0.1	5.8	< 0.1	< 0.1	5.8	
ICS-01-98 (0-0.5)	9/1/2021	9/7/2021	76	< 0.1	< 0.1	0.3	< 0.1	< 0.1	0.3	
ICS-01-99 (0-0.5)	9/1/2021	9/7/2021	75	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-100 (0-0.5)	9/1/2021	9/7/2021	82	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-101 (0-0.5)	9/1/2021	9/7/2021	89	< 0.1	< 0.1	0.6	< 0.1	< 0.1	0.6	
ICS-01-102 (0-0.5)	9/1/2021	9/7/2021	86	< 0.1	< 0.1	1.0	< 0.1	< 0.1	1.0	
ICS-01-103 (0-0.5)	9/1/2021	9/7/2021	82	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-104 (0-0.5)	10/21/2021	10/25/2021	111	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-01-105 (0-0.5)	12/28/2022	1/4/2023	78	< 0.1	< 0.1	0.3	< 0.1	< 0.1	0.3	
ICS-01-106 (0-0.5)	12/28/2022	1/4/2023	84	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-01-107 (0-0.5)	12/28/2022	1/4/2023	85	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
			Secon	d Floor						
ICS-02-01 (0-0.5)	10/2/2018	10/11/2018	76	< 0.1	0.2	< 0.1	< 0.1	< 0.1	0.2	
ICS-02-02 (0-0.5)	10/2/2018	10/11/2018	65	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-03 (0-0.5)	10/2/2018	10/11/2018	66	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-04 (0-0.5)	10/2/2018	10/11/2018	59	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-05 (0-0.5)	10/2/2018	10/11/2018	78	< 0.1	<0.1	<0.1	< 0.1	< 0.1	< 0.1	
ICS-02-06 (0-0.5)	10/2/2018	10/11/2018	69	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5	
ICS-02-07 (0-0.5)	10/2/2018	10/11/2018	69	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-02-08 (0-0.5)	10/2/2018	10/11/2018	74	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-09 (0-0.5)	10/2/2018	10/11/2018	86	< 0.1	< 0.1	< 0.1	< 0.1	<0.1	< 0.1	
ICS-02-10 (0-0.5)	10/2/2018	10/11/2018	56	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-11 (0-0.5)	10/2/2018	10/11/2018	60	< 0.1	<0.1	<0.1	< 0.1	< 0.1	< 0.1	
EPA Standard									1	
RDFC									10	

Notes:
I. Sample ID includes depth in inches collected below grade.
2. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
3. Analytical results are reported in milligrams per kilogram (mg/kg).
4. < denotes analyte was not detected above the laboratory detection limit.
5. Padl indicates are surgedenae of the PDA cation lawal fear unserted former Site use

5. Bold indicates an exceedance of the EPA action level for unrestricted future Site use.

Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 SD indicates surrogate recovery percentage diluted below laboratory quantification limit.

8. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

9. Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

Table 1 - Concrete Floor and Ceiling Analytical Results										
Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclo- 1242	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	
ICS-02-12 (0-0.5)	10/2/2018	10/11/2018	72	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-13 (0-0.5)	10/2/2018	10/11/2018	75	< 0.1	0.1	< 0.1	< 0.1	< 0.1	0.1	
ICS-02-14 (0-0.5)	10/2/2018	10/11/2018	79	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-15 (0-0.5)	10/2/2018	10/11/2018	77	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1	
ICS-02-16 (0-0.5)	9/1/2021	9/11/2021	66	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-17 (0-0.5)	9/1/2021	9/11/2021	73	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-18 (0-0.5)	9/1/2021	9/11/2021	84	< 0.1	16.4	< 0.1	< 0.1	< 0.1	16.4	
ICS-02-19 (0-0.5)	10/13/2022	10/28/2022	93	1.0	< 0.1	0.2	< 0.1	< 0.1	1.2	
ICS-02-20 (0-0.5)	10/13/2022	10/28/2022	93	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-21 (0-0.5)	10/13/2022	10/28/2022	99	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-22 (0-0.5)	12/28/2022	1/4/2023	76	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1	
ICS-02-23 (0-0.5)	12/28/2022	1/4/2023	70	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-24 (0-0.5)	12/28/2022	1/4/2023	80	< 0.1	< 0.1	0.3	< 0.1	< 0.1	0.3	
ICS-02-25 (0-0.5)	12/28/2022	1/4/2023	67	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1	
ICS-02-26 (0-0.5)	12/28/2022	1/4/2023	83	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1	
ICS-02-27 (0-0.5)	12/28/2022	1/4/2023	86	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1	
ICS-02-28 (0-0.5)	12/28/2022	1/4/2023	88	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1	
ICS-02-29 (0-0.5)	12/28/2022	1/4/2023	83	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5	
ICS-02-31 (0-0.5)	12/28/2022	1/4/2023	73	< 0.09	< 0.09	0.2	< 0.09	< 0.09	0.2	
ICS-02-32 (0-0.5)	12/28/2022	1/3/2023	81	< 0.1	< 0.1	0.4	< 0.1	< 0.1	0.4	
ICS-02-33 (0-0.5)	12/28/2022	1/3/2023	80	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1	
ICS-02-34 (0-0.5)	1/27/2023	1/30/2023	76	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-02-35 (0-0.5)	1/27/2023	1/30/2023	74	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	
ICS-02-36 (0-0.5)	1/27/2023	1/30/2023	68	< 0.1	0.2	0.1	< 0.1	< 0.1	0.3	
ICS-02-37 (0-0.5)	1/27/2023	1/30/2023	66	< 0.1	0.3	0.2	< 0.1	< 0.1	0.5	
ICS-02-38 (0-0.5)	1/27/2023	1/30/2023	62	< 0.1	0.3	0.3	< 0.1	< 0.1	0.6	
ICS-02-39 (0-0.5)	1/27/2023	1/30/2023	68	< 0.1	0.2	0.1	< 0.1	< 0.1	0.3	
			3rd	Floor						
ICS-03-01 (0-0.5)	10/2/2018	10/11/2018	68	< 0.1	< 0.1	1.5	< 0.1	< 0.1	1.5	
ICS-03-02 (0-0.5)	10/2/2018	10/11/2018	72	< 0.1	1.4	1.2	< 0.1	< 0.1	2.6	
ICS-03-03 (0-0.5)	10/2/2018	10/11/2018	76	< 0.1	0.7	0.9	< 0.1	< 0.1	1.6	
ICS-03-04 (0-0.5)	10/2/2018	10/11/2018	59	< 0.1	1.2	1.0	< 0.1	< 0.1	2.2	
ICS-03-05 (0-0.5)	10/2/2018	10/11/2018	77	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5	
ICS-03-06 (0-0.5)	10/2/2018	10/11/2018	81	< 0.1	< 0.1	0.7	< 0.1	< 0.1	0.7	
ICS-03-07 (0-0.5)	10/2/2018	10/11/2018	80	< 0.1	< 0.1	0.4	< 0.1	< 0.1	0.4	
ICS-03-08 (0-0.5)	10/2/2018	10/11/2018	81	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-03-09 (0-0.5)	10/2/2018	10/11/2018	81	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-03-10 (0-0.5)	10/2/2018	10/11/2018	87	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-03-11 (0-0.5)	10/2/2018	10/11/2018	84	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-03-12 (0-0.5)	10/2/2018	10/11/2018	80	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
ICS-03-13 (0-0.5)	10/2/2018	10/11/2018	76	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	
ICS-03-14 (0-0.5)	10/2/2018	10/11/2018	81	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	
EPA Standard									1	
RDEC									10	

Notes:
I. Sample ID includes depth in inches collected below grade.
2. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
3. Analytical results are reported in milligrams per kilogram (mg/kg).
4. < denotes analyte was not detected above the laboratory detection limit.
5. Padl dilators on gradenage of the PDA cation lawal for unrestricted formers Site use

5. Bold indicates an exceedance of the EPA action level for unrestricted future Site use.

Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 SD indicates surrogate recovery percentage diluted below laboratory quantification limit.

8. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

9. Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.
| Table 1 - Concrete Floor and Ceiling Analytical Results |                |                  |                                  |                 |                  |                  |                  |                  |               |  |  |  |  |
|---------------------------------------------------------|----------------|------------------|----------------------------------|-----------------|------------------|------------------|------------------|------------------|---------------|--|--|--|--|
| Sample ID                                               | Sample<br>Date | Analysis<br>Date | Surrogate Recovery<br>Percentage | Aroclo-<br>1242 | Aroclor-<br>1254 | Aroclor-<br>1260 | Aroclor-<br>1262 | Aroclor-<br>1268 | Total<br>PCBs |  |  |  |  |
| ICS-03-15 (0-0.5)                                       | 10/2/2018      | 10/11/2018       | 70                               | < 0.1           | < 0.1            | 0.3              | < 0.1            | < 0.1            | 0.3           |  |  |  |  |
| ICS-03-16 (0-0.5)                                       | 10/2/2018      | 10/11/2018       | 49                               | < 0.1           | < 0.1            | 0.5              | < 0.1            | < 0.1            | 0.5           |  |  |  |  |
| ICS-03-17 (0-0.5)                                       | 10/2/2018      | 10/11/2018       | 80                               | < 0.1           | < 0.1            | 0.1              | < 0.1            | < 0.1            | 0.1           |  |  |  |  |
| ICS-03-18 (0-0.5)                                       | 10/2/2018      | 10/11/2018       | 83                               | < 0.1           | < 0.1            | 0.3              | < 0.1            | < 0.1            | 0.3           |  |  |  |  |
| ICS-03-19 (0-0.5)                                       | 10/30/2018     | 11/6/2018        | 84                               | < 0.1           | < 0.1            | 15.7             | < 0.1            | < 0.1            | 15.7          |  |  |  |  |
| ICS-03-19 (0.5-1)                                       | 9/26/2019      | 10/3/2019        | 78                               | < 0.09          | < 0.09           | 0.3              | < 0.09           | < 0.09           | 0.3           |  |  |  |  |
| ICS-03-19 (1-2)                                         | 9/26/2019      | 10/3/2019        | 83                               | < 0.09          | < 0.09           | < 0.09           | < 0.09           | < 0.09           | < 0.09        |  |  |  |  |
| ICS-03-19 (2-3)                                         | 9/26/2019      | 10/3/2019        | 48                               | < 0.09          | < 0.09           | < 0.09           | < 0.09           | < 0.09           | < 0.09        |  |  |  |  |
| ICS-03-20 (0-0.5)                                       | 10/30/2018     | 11/6/2018        | 82                               | < 0.1           | < 0.1            | 6.4              | < 0.1            | < 0.1            | 6.4           |  |  |  |  |
| ICS-03-21 (0-0.5)                                       | 10/30/2018     | 11/6/2018        | 75                               | < 0.1           | < 0.1            | 7.5              | < 0.1            | < 0.1            | 7.5           |  |  |  |  |
| ICS-03-21 (0.5-1)                                       | 9/26/2019      | 10/3/2019        | 81                               | < 0.1           | < 0.1            | 0.3              | < 0.1            | < 0.1            | 0.3           |  |  |  |  |
| ICS-03-21 (1-2)                                         | 9/26/2019      | 10/3/2019        | 83                               | < 0.09          | < 0.09           | < 0.09           | < 0.09           | < 0.09           | < 0.09        |  |  |  |  |
| ICS-03-21 (2-3)                                         | 9/26/2019      | 10/3/2019        | 85                               | < 0.09          | < 0.09           | < 0.09           | < 0.09           | < 0.09           | < 0.09        |  |  |  |  |
| ICS-03-22 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 94                               | < 0.1           | < 0.1            | 0.8              | < 0.1            | < 0.1            | 0.8           |  |  |  |  |
| ICS-03-23 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 93                               | < 0.09          | < 0.09           | 1.3              | < 0.09           | < 0.09           | 1.3           |  |  |  |  |
| ICS-03-23 (0.5-1)                                       | 1/13/2020      | 1/13/2020        | 93                               | < 0.1           | < 0.1            | 0.2              | < 0.1            | < 0.1            | 0.2           |  |  |  |  |
| ICS-03-23 (1-2)                                         | 1/3/2020       | 1/13/2020        | 89                               | < 0.1           | < 0.1            | 0.3              | < 0.1            | < 0.1            | 0.3           |  |  |  |  |
| ICS-03-23 (2-3)                                         | 1/3/2020       | 1/13/2020        | 94                               | < 0.1           | < 0.1            | < 0.1            | < 0.1            | < 0.1            | < 0.1         |  |  |  |  |
| ICS-03-24 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 68                               | < 0.01          | < 0.01           | 0.9              | < 0.1            | < 0.1            | 0.9           |  |  |  |  |
| ICS-03-25 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 87                               | < 0.09          | < 0.09           | 1.4              | <0.1             | < 0.09           | 1.4           |  |  |  |  |
| ICS-03-26 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 52                               | < 0.09          | < 0.09           | 1.5              | < 0.09           | < 0.09           | 1.5           |  |  |  |  |
| ICS-03-27 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 82                               | <0.1            | < 0.1            | 2.1              | <0.1             | < 0.1            | 2.1           |  |  |  |  |
| ICS-03-27 (0.5-1)                                       | 1/3/2020       | 1/13/2020        | 85                               | <0.1            | < 0.1            | < 0.1            | <0.1             | < 0.1            | <0.1          |  |  |  |  |
| ICS-03-27 (1-2)                                         | 1/3/2020       | 1/13/2020        | 84                               | <0.1            | <0.1             | <0.1             | <0.1             | <0.1             | <0.1          |  |  |  |  |
| ICS-03-27 (2-3)                                         | 1/3/2020       | 1/13/2020        | 63                               | <0.1            | < 0.1            | <0.1             | <0.1             | < 0.1            | < 0.1         |  |  |  |  |
| ICS-03-28 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 68                               | < 0.09          | <0.09            | 1.9              | <0.09            | <0.09            | 1.9           |  |  |  |  |
| ICS-03-29 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 72                               | < 0.09          | <0.09            | 2.5              | < 0.09           | <0.09            | 2.5           |  |  |  |  |
| ICS-03-30 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 90                               | < 0.09          | <0.09            | 1.0              | < 0.09           | <0.09            | 1.0           |  |  |  |  |
| ICS-03-31 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 68                               | < 0.09          | < 0.09           | 1.5              | < 0.09           | < 0.09           | 1.5           |  |  |  |  |
| ICS-03-32 (0-0.5)                                       | 2/28/2019      | 3/5/2019         | 59                               | <0.1            | <0.1             | 1.1              | <0.1             | <0.1             | 1.1           |  |  |  |  |
| ICS-03-33 (0-0.5)                                       | 2/28/2019      | 3/5/2019         | 77                               | <0.1            | < 0.1            | 6.0              | <0.1             | < 0.1            | 6.0           |  |  |  |  |
| ICS-03-33 (1-2)                                         | 1/3/2020       | 1/13/2020        | 79                               | <0.1            | 0.4              | 0.3              | < 0.1            | < 0.1            | 0.7           |  |  |  |  |
| ICS-03-33 (2-3)                                         | 1/3/2020       | 1/13/2020        | 83                               | <0.1            | 0.2              | 0.1              | <0.1             | <0.1             | 0.3           |  |  |  |  |
| ICS-03-34 (0-0.5)                                       | 2/28/2019      | 3/5/2019         | 78                               | <0.1            | < 0.1            | 1.9              | <0.1             | < 0.1            | 1.9           |  |  |  |  |
| ICS-03-35 (0-0.5)                                       | 2/28/2019      | 3/5/2019         | 59                               | <0.1            | <0.1             | 1.7              | <0.1             | <0.1             | 1.7           |  |  |  |  |
| ICS-03-36 (0-0.5)                                       | 2/28/2019      | 3/5/2019         | 68                               | < 0.09          | <0.09            | 1.9              | < 0.09           | <0.09            | 1.9           |  |  |  |  |
| ICS-03-37 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 69                               | <0.1            | < 0.1            | 8.2              | <0.1             | < 0.1            | 8.2           |  |  |  |  |
| ICS-03-38 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 57                               | <0.1            | <0.1             | 15.5             | <0.1             | <0.1             | 15.5          |  |  |  |  |
| ICS-03-38 (0.5-1)                                       | 9/26/2019      | 10/3/2019        | 76                               | <0.1            | <0.1             | 1.3              | <0.1             | <0.1             | 1.3           |  |  |  |  |
| ICS-03-38 (1-2)                                         | 9/26/2019      | 10/3/2019        | 81                               | <0.09           | <0.09            | 0.5              | <0.9             | <0.09            | 0.5           |  |  |  |  |
| ICS-03-38 (2-3)                                         | 9/26/2019      | 10/3/2019        | 89                               | <0.1            | <0.1             | <0.1             | <0.1             | <0.1             | <0.1          |  |  |  |  |
| ICS-03-39 (0-0.5)                                       | 2/28/2019      | 3/6/2019         | 77                               | <0.09           | <0.09            | 2.1              | <0.09            | <0.09            | 2.1           |  |  |  |  |
| EPA Standard                                            |                |                  |                                  | ,               |                  |                  |                  |                  |               |  |  |  |  |
| RDEC                                                    |                |                  |                                  |                 |                  |                  |                  |                  | 10            |  |  |  |  |

Notes:
I. Sample ID includes depth in inches collected below grade.
2. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
3. Analytical results are reported in milligrams per kilogram (mg/kg).
4. < denotes analyte was not detected above the laboratory detection limit.
5. Padl dilators on gradenage of the PDA cation lawal for unrestricted formers Site use

5. Bold indicates an exceedance of the EPA action level for unrestricted future Site use.

Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 SD indicates surrogate recovery percentage diluted below laboratory quantification limit.

8. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

Table 1 - Concrete Floor and Ceiling Analytical Results													
Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclo- 1242	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs				
ICS-03-40 (0-0.5)	2/28/2019	3/7/2019	SD	<5.0	<5.0	172	<5.0	<5.0	172				
ICS-03-40 (0.5-1)	9/26/2019	10/3/2019	91	< 0.1	< 0.1	7.1	< 0.1	< 0.1	7.1				
ICS-03-40 (1-2)	9/26/2019	10/3/2019	88	< 0.09	< 0.09	1.0	< 0.09	< 0.09	1.0				
ICS-03-40 (2-3)	9/26/2019	10/7/2019	95	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5				
ICS-03-40 (3-4)	9/26/2019	10/7/2019	106	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2				
ICS-03-41 (0-0.5)	2/28/2019	3/6/2019	84	< 0.1	< 0.1	3.7	< 0.1	< 0.1	3.7				
ICS-03-42 (0-0.5)	2/28/2019	3/6/2019	82	< 0.1	< 0.1	11	< 0.1	< 0.1	11.0				
ICS-03-43 (0-0.5)	9/26/2019	10/7/2019	SD	<2.0	<2.0	47.6	<2.0	<2.0	47.6				
ICS-03-43 (0.5-1)	9/26/2019	10/3/2019	80	< 0.09	< 0.09	2.1	< 0.09	< 0.09	2.1				
ICS-03-43 (1-2)	9/26/2019	10/3/2019	82	< 0.1	< 0.1	1.4	< 0.1	< 0.1	1.4				
ICS-03-43 (2-3)	9/26/2019	10/3/2019	91	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2				
ICS-03-44 (0-0.5)	9/26/2019	10/8/2019	SD	<500	<500	9080	<500	<500	9,080				
ICS-03-44 (0.5-1)	1/3/2020	1/13/2020	SD	<1010	<1010	3,300	<1010	<1010	3,300				
ICS-03-44 (1-2)	1/3/2019	1/13/2020	SD	<99.3	<99.3	1,100	<99.3	<99.3	1,100				
ICS-03-44 (2-3)	1/3/2020	1/13/2020	SD	<2.0	<2.0	69.6	<2.0	<2.0	69.6				
ICS-03-44 (3-4)	1/3/2020	1/14/2020	SD	<24.5	<24.5	180	<24.5	<24.5	180.0				
ICS-03-45 (0-0.5)	9/29/2019	10/8/2019	SD	<930	<930	27,700	<930	<930	27,700				
ICS-03-45 (0.5-1)	1/3/2020	1/13/2020	SD	<1020	<1020	20,900	<1020	<1020	20,900				
ICS-03-45 (1-2)	1/3/2020	1/13/2020	SD	<1000	<1000	13,400	<1000	<1000	13,400				
ICS-03-45 (2-3)	1/3/2020	1/13/2020	SD	<1000	<1000	8,970	<1000	<1000	8,970				
ICS-03-45 (3-4)	1/3/2020	1/13/2020	SD	<993	<993	12,000	<993	<993	12,000				
ICS-03-46 (0-0.5)	9/29/2019	10/7/2019	95	< 0.1	< 0.1	2.8	< 0.1	< 0.1	2.8				
ICS-03-47 (0-0.5)	9/26/2019	10/7/2019	83	< 0.1	< 0.1	2.6	< 0.1	< 0.1	2.6				
ICS-03-48 (0-0.5)	9/26/2019	10/7/2019	83	< 0.09	< 0.09	0.9	< 0.09	< 0.09	0.9				
ICS-03-49 (0-0.5)	1/3/2020	1/13/2020	82	< 0.1	< 0.1	0.3	< 0.1	< 0.1	0.3				
ICS-03-50 (0-0.5)	1/3/2020	1/13/2020	88	< 0.1	< 0.1	0.4	< 0.1	< 0.1	0.4				
ICS-03-51 (0-0.5)	1/3/2020	1/13/2020	86	< 0.1	< 0.1	0.7	< 0.1	< 0.1	0.7				
ICS-03-52 (0-0.5)	1/3/2020	1/10/2020	81	< 0.1	< 0.1	0.3	< 0.1	< 0.1	0.3				
ICS-03-53 (0-0.5)	1/3/2020	1/10/2020	83	< 0.1	< 0.1	0.6	< 0.1	< 0.1	0.6				
ICS-03-54 (0-0.5)	1/3/2020	1/10/2020	88	< 0.1	< 0.1	0.6	< 0.1	< 0.1	0.6				
ICS-03-55 (0-0.5)	1/3/2020	1/10/2020	71	< 0.1	< 0.1	0.9	< 0.1	< 0.1	0.9				
ICS-03-56 (0-0.5)	1/3/2020	1/10/2020	77	< 0.1	< 0.1	0.3	< 0.1	< 0.1	0.3				
ICS-03-57 (0-0.5)	5/28/2020	6/9/2020	113	< 0.1	< 0.1	0.3	< 0.1	< 0.1	0.3				
ICS-03-58 (0-0.5)	5/28/2020	6/9/2020	76	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5				
ICS-03-59 (0-0.5)	5/28/2020	6/9/2020	77	< 0.1	< 0.1	0.9	< 0.1	< 0.1	0.9				
ICS-03-60 (0-0.5)	5/28/2020	6/9/2020	85	< 0.1	< 0.1	0.9	< 0.1	< 0.1	0.9				
ICS-03-61 (0-0.5)	9/2/2020	9/10/2020	66	< 0.1	< 0.1	0.6	< 0.1	< 0.1	0.6				
ICS-03-62 (0-0.5)	9/2/2020	9/10/2020	58	< 0.1	< 0.1	0.6	< 0.1	< 0.1	0.6				
ICS-03-63 (0-0.5)	9/2/2020	9/10/2020	66	< 0.1	< 0.1	0.4	< 0.1	< 0.1	0.4				
ICS-03-64 (0-0.5)	9/2/2020	9/10/2020	66	<0.1	< 0.1	0.3	< 0.1	< 0.1	0.3				
ICS-03-65 (0-0.5)	9/2/2020	9/10/2020	67	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5				
ICS-03-66 (0-0.5)	9/2/2020	9/10/2020	54	< 0.1	< 0.1	0.4	< 0.1	< 0.1	0.4				
EPA Standard					-				1				
RDEC									10				

Notes:
I. Sample ID includes depth in inches collected below grade.
2. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
3. Analytical results are reported in milligrams per kilogram (mg/kg).
4. < denotes analyte was not detected above the laboratory detection limit.
5. Padl dilators on gradenage of the PDA cation lawal for unrestricted formers Site use

5. Bold indicates an exceedance of the EPA action level for unrestricted future Site use.

Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 SD indicates surrogate recovery percentage diluted below laboratory quantification limit.

8. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

Table 1 - Concrete Floor and Ceiling Analytical Results													
Sample ID	Sample Date	Analysis Date	Surrogate Recove Percentage	ry Aroclo- 1242	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs				
ICS-03-67 (0-0.5)	9/2/2020	9/10/2020	53	< 0.1	<0.1	0.5	<0.1	< 0.1	0.5				
ICS-03-68 (0-0.5)	9/2/2020	9/10/2020	64	< 0.1	< 0.1	0.7	< 0.1	< 0.1	0.7				
ICS-03-69 (0-0.5)	9/2/2020	9/10/2020	53	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5				
ICS-03-70 (0-0.5)	9/2/2020	9/10/2020	52	< 0.1	< 0.1	0.3	< 0.1	< 0.1	0.3				
ICS-03-71 (0-0.5)	4/27/2021	5/4/2021	90	< 0.1	< 0.1	5.6	< 0.1	< 0.1	5.6				
ICS-03-72 (0-0.5)	12/28/2022	1/4/2023	63	< 0.1	< 0.1	0.7	< 0.1	< 0.1	0.7				
ICS-03-73 (0-0.5)	12/28/2022	1/4/2023	61	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09				
ICS-03-74 (0-0.5)	12/28/2022	1/4/2023	71	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09				
ICS-03-75 (0-0.5)	12/28/2022	1/4/2023	86	< 0.09	< 0.09	0.1	< 0.09	< 0.09	0.1				
ICS-03-76 (0-0.5)	12/28/2022	1/4/2023	70	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-03-77 (0-0.5)	12/28/2022	1/4/2023	69	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-03-78 (0-0.5)	12/28/2022	1/4/2023	79	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09				
ICS-03-79 (0-0.5)	12/28/2022	1/4/2023	69	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09				
ICS-03-80 (0-0.5)	12/28/2022	1/4/2023	65	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-03-81 (0-0.5)	12/28/2022	1/4/2023	78	< 0.09	< 0.09	0.4	< 0.09	< 0.09	0.4				
ICS-03-82 (0-0.5)	12/28/2022	1/4/2023	70	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-03-83 (0-0.5)	12/28/2022	1/4/2023	68	< 0.1	< 0.1	<0.1	< 0.1	< 0.1	< 0.1				
ICS-03-84 (0-0.5)	12/28/2022	1/4/2023	54	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-03-88 (0-0.5)	12/28/2022	1/4/2023	80	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1				
ICS-03-89 (0-0.5)	12/28/2022	1/4/2023	82	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2				
ICS-03-90 (0-0.5)	12/28/2022	1/4/2023	74	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09				
ICS-03-91 (0-0.5)	12/28/2022	1/4/2023	71	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-03-92 (0-0.5)	12/28/2022	1/4/2023	80	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1				
ICS-03-93 (0-0.5)	12/28/2022	1/3/2023	84	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2				
ICS-03-94 (0-0.5)	12/28/2022	1/3/2023	72	< 0.1	<0.1	0.1	<0.1	< 0.1	0.1				
ICS-03-95 (0-0.5)	12/28/2022	1/3/2023	78	< 0.1	<0.1	0.3	<0.1	< 0.1	0.3				
ICS-03-96 (0-0.5)	12/28/2022	1/3/2023	82	< 0.1	<0.1	0.3	<0.1	< 0.1	0.3				
ICS-03-97 (0-0.5)	12/28/2022	1/3/2023	86	< 0.1	<0.1	0.1	<0.1	< 0.1	0.1				
ICS-03-98 (0-0.5)	12/28/2022	1/3/2023	88	< 0.1	<0.1	0.3	<0.1	< 0.1	0.3				
ICS-03-99 (0-0.5)	12/28/2022	1/3/2023	86	< 0.1	<0.1	0.3	<0.1	< 0.1	0.3				
ICS-03-100 (0-0.5)	12/28/2022	1/3/2023	86	<0.1	<0.1	0.1	<0.1	< 0.1	0.1				
ICS-03-101 (0-0.5)	12/28/2022	1/4/2023	87	<0.1	<0.1	0.1	<0.1	<0.1	0.1				
ICS-03-102 (0-0.5)	12/28/2022	1/4/2023	83	< 0.09	<0.09	< 0.09	<0.09	< 0.09	<0.09				
ICS-03-103 (0-0.5)	12/28/2022	1/4/2023	72	<0.1	<0.1	1.3	<0.1	< 0.1	1.3				
ICS-03-104 (1-1.5)	1/27/2023	1/30/2023	73	<0.1	<0.1	0.1	<0.1	<0.1	0.1				
ICS-03-104 (2-2.5)	1/27/2023	1/30/2023	74	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1				
ICS-03-105 (0-0.5)	1/27/2023	1/30/2023	81	<0.1	0.4	0.3	<0.1	<0.1	0.7				
ICS-03-106 (0-0.5)	1/27/2023	1/30/2023	72	< 0.09	1.0	1.2	< 0.09	< 0.09	2.2				
ICS-03-107 (0-0.5)	1/27/2023	1/30/2023	80	< 0.09	0.4	0.2	< 0.09	< 0.09	0.6				
ICS-03-108 (0-0.5)	1/27/2023	1/30/2023	80	<0.09	1.1	0.9	<0.09	<0.09	2.0				
	10/2/2010	10/11/2010	F0	urth Floor	<0.1	1.0	<0.1	<0.1	1.0				
EDA Standard	10/2/2018	10/11/2018	12	<0.1	<0.1	1.0	<0.1	<0.1	1.0				
EFA Sianaara									1				
Notes:									10				

Notes:
1. Sample ID includes depth in inches collected below grade.
2. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
3. Analytical results are reported in milligrams per kilogram (mg/kg).
4. < denotes analyte was not detected above the laboratory detection limit.</li>
5. Bublic bu

Bold indicates an exceedance of the EPA action level for unrestricted future Site use.
 Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 SD indicates surrogate recovery percentage diluted below laboratory quantification limit.

8. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.
 9. Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

Table 1 - Concrete Floor and Ceiling Analytical Results													
Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclo- 1242	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs				
ICS-04-02 (0-0.5)	10/2/2018	10/11/2018	80	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1				
ICS-04-03 (0-0.5)	10/2/2018	10/11/2018	65	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-04 (0-0.5)	10/3/2018	10/12/2018	57	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-05 (0-0.5)	10/3/2018	10/12/2018	69	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-06 (0-0.5)	10/3/2018	10/12/2018	70	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-07 (0-0.5)	10/3/2018	10/12/2018	90	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-08 (0-0.5)	10/3/2018	10/12/2018	86	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-09 (0-0.5)	10/3/2018	10/12/2018	88	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-10 (0-0.5)	10/3/2018	10/12/2018	95	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-11 (0-0.5)	10/3/2018	10/12/2018	90	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-12 (0-0.5)	10/3/2018	10/12/2018	95	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-13 (0-0.5)	10/3/2018	10/12/2018	83	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-14 (0-0.5)	10/3/2018	10/12/2018	93	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1				
ICS-04-15 (0-0.5)	10/30/2018	11/6/2018	78	< 0.1	< 0.1	0.8	< 0.1	< 0.1	0.8				
ICS-04-16 (0-0.5)	10/30/2018	11/6/2018	80	< 0.1	< 0.1	1.5	< 0.1	< 0.1	1.5				
ICS-04-17 (0-0.5)	9/27/2019	10/7/2019	75	< 0.09	< 0.09	0.6	< 0.09	< 0.09	0.6				
ICS-04-18 (0-0.5)	9/27/2019	10/7/2019	66	< 0.1	< 0.1	0.5	< 0.1	< 0.1	0.5				
ICS-04-19 (0-0.5)	9/27/2019	10/7/2019	73	< 0.1	< 0.1	0.6	<0.1	< 0.1	0.6				
ICS-04-20 (0-0.5)	9/27/2019	10/7/2019	75	< 0.1	< 0.1	0.9	<0.1	< 0.1	0.9				
ICS-04-21 (0-0.5)	1/3/2020	1/10/2020	77	< 0.1	0.3	0.5	<0.1	< 0.1	0.8				
ICS-04-22 (0-0.5)	1/3/2020	1/10/2020	83	<0.1	0.4	0.4	<0.1	< 0.1	0.8				
ICS-04-23 (0-0.5)	1/3/2020	1/10/2020	81	< 0.1	0.2	0.3	<0.1	< 0.1	0.5				
ICS-04-24 (0-0.5)	1/3/2020	1/10/2020	76	<0.1	< 0.1	0.3	<0.1	< 0.1	0.3				
ICS-04-25 (0-0.5)	5/29/2020	6/9/2020	76	<0.1	<0.1	0.7	<0.1	<0.1	0.7				
ICS-04-26 (0-0.5)	5/29/2020	6/9/2020	67	< 0.1	< 0.1	3.0	<0.1	< 0.1	3.0				
ICS-04-27 (0-0.5)	5/29/2020	6/9/2020	86	<0.1	<0.1	2.1	<0.1	<0.1	2.1				
ICS-04-28 (0-0.5)	9/2/2020	9/10/2020	47	<0.1	<0.1	0.9	<0.1	<0.1	0.9				
ICS-04-29 (0-0.5)	9/2/2020	9/10/2020	56	<0.1	<0.1	0.5	<0.1	<0.1	0.5				
ICS-04-30 (0-0.5)	9/2/2020	9/10/2020	47	<0.1	<0.1	0.3	<0.1	< 0.1	0.3				
ICS-04-31 (0-0.5)	9/2/2020	9/10/2020	53	<0.1	<0.1	0.5	<0.1	<0.1	0.5				
ICS-04-32 (0-0.5)	9/2/2020	9/10/2020	59	< 0.1	< 0.1	0.5	<0.1	< 0.1	0.5				
ICS-04-33 (0-0.5)	4/27/2021	5/4/2021	84	<0.1	0.5	0.5	<0.1	< 0.1	1.0				
ICS-04-34 (0-0.5)	4/27/2021	5/4/2021	68	<0.1	0.2	0.3	<0.1	<0.1	0.5				
ICS-04-35 (0-0.5)	4/27/2021	5/4/2021	77	<0.1	0.5	0.7	<0.1	< 0.1	1.2				
ICS-04-36 (0-0.5)	4/27/2021	5/5/2021	79	<0.1	0.3	0.4	<0.1	<0.1	0.7				
ICS-04-37 (0-0.5)	12/29/2022	1/4/2023	69	<0.1	<0.1	0.2	<0.1	<0.1	0.2				
ICS-04-38 (0-0.5)	12/29/2022	1/4/2023	75	<0.1	<0.1	0.2	<0.1	<0.1	0.2				
ICS-04-39 (0-0.5)	12/29/2022	1/4/2023	80	<0.1	<0.1	0.3	<0.1	<0.1	0.3				
ICS-04-40 (0-0.5)	12/29/2022	1/4/2023	72	<0.1	<0.1	0.1	<0.1	<0.1	0.1				
ICS-04-41 (0-0.5)	12/29/2022	1/4/2023	62	<0.09	<0.09	0.1	<0.09	<0.09	0.1				
ICS-04-42 (0-0.5)	12/29/2022	1/4/2023	84	<0.1	<0.1	0.1	<0.1	<0.1	0.1				
ICS-04-43 (0-0.5)	12/29/2022	1/4/2023	83	< 0.09	<0.09	<0.09	<0.09	<0.09	<0.09				
EPA Standard			. •						1				
RDEC									10				

Notes:
I. Sample ID includes depth in inches collected below grade.
2. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
3. Analytical results are reported in milligrams per kilogram (mg/kg).
4. < denotes analyte was not detected above the laboratory detection limit.
5. Padl dilators on gradenage of the PDA cation lawal for unrestricted formers Site use

5. Bold indicates an exceedance of the EPA action level for unrestricted future Site use.

Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 SD indicates surrogate recovery percentage diluted below laboratory quantification limit.

8. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

Sample ID	Sample	A	Table 1 - Concrete Floor and Ceiling Analytical Results													
	Date	Date	Surrogate Recovery Percentage	Aroclo- 1242	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs							
ICS-04-44 (0-0.5)	12/29/2022	1/3/2023	84	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1							
ICS-04-45 (0-0.5)	12/29/2022	1/3/2023	83	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2							
ICS-04-46 (0-0.5)	12/29/2022	1/3/2023	83	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-47 (0-0.5)	12/29/2022	1/3/2023	75	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-48 (0-0.5)	12/29/2022	1/3/2023	81	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-49 (0-0.5)	12/29/2022	1/3/2023	89	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-50 (0-0.5)	12/29/2022	1/3/2023	90	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-51 (0-0.5)	12/29/2022	1/3/2023	80	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-52 (0-0.5)	12/29/2022	1/3/2023	85	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-53 (0-0.5)	12/29/2022	1/3/2023	69	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-54 (0-0.5)	12/29/2022	1/6/2023	66	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-55 (0-0.5)	12/29/2022	1/3/2023	73	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-56 (0-0.5)	12/29/2022	1/3/2023	65	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-57 (0-0.5)	12/29/2022	1/3/2023	75	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-58 (0-0.5)	12/29/2022	1/6/2023	84	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-59 (0-0.5)	12/29/2022	1/6/2023	72	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-60 (0-0.5)	12/29/2022	1/6/2023	74	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1							
ICS-04-61 (0-0.5)	12/29/2022	1/6/2023	65	< 0.1	< 0.1	<0.1	<0.1	< 0.1	< 0.1							
ICS-04-62 (0-0.5)	12/29/2022	1/6/2023	80	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1							
ICS-04-63 (0-0.5)	12/29/2022	1/6/2023	83	< 0.1	< 0.1	<0.1	<0.1	< 0.1	< 0.1							
			Fifth	Floor												
ICS-05-01 (0-0.5)	10/3/2018	10/12/2018	93	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1							
ICS-05-02 (0-0.5)	10/3/2018	10/12/2018	96	< 0.1	< 0.1	0.4	<0.1	< 0.1	0.4							
ICS-05-03 (0-0.5)	10/3/2018	10/12/2018	76	<0.1	<0.1	0.5	<0.1	<0.1	0.5							
ICS-05-04 (0-0.5)	10/3/2018	10/12/2018	79	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1							
ICS-05-05 (0-0.5)	10/3/2018	10/12/2018	88	<0.1	<0.1	0.2	<0.1	<0.1	0.2							
ICS-05-06 (0-0.5)	10/3/2018	10/12/2018	91	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1							
ICS-05-07 (0-0.5)	10/3/2018	10/12/2018	87	<0.1	<0.1	0.3	<0.1	<0.1	0.3							
ICS-05-08 (0-0.5)	10/3/2018	10/12/2018	80	<0.1	<0.1	0.3	<0.1	<0.1	0.3							
ICS-05-09 (0-0.5)	10/3/2018	10/12/2018	81	<0.1	<0.1	0.3	<0.1	<0.1	0.3							
ICS-05-10 (0-0.5)	10/3/2018	10/10/2018	75	<0.1	<0.1	0.2	<0.1	<0.1	0.2							
ICS-05-11 (0-0.5)	4/27/2021	5/5/2021	92	<0.1	0.3	0.6	<0.1	<0.1	0.9							
ICS-05-12 (0-0.5)	4/27/2021	5/5/2021	91	<0.1	<0.1	0.6	<0.1	<0.1	0.6							
ICS-05-13 (0-0 5)	12/29/2022	1/3/2023	84	<0.1	<0.1	<0.0	<0.1	<0.1	<0.0							
ICS-05-14 (0-0 5)	12/29/2022	1/3/2023	85	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1							
ICS-05-15 (0-0.5)	12/29/2022	1/3/2023	84	<0.1	<0.1	0.1	<0.1	<0.1	0.1							
ICS-05-16 (0-0.5)	12/29/2022	1/3/2023	86	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1							
ICS-05-17 (0-0.5)	12/29/2022	1/3/2023	87	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1							
ICS-05-18 (0-0.5)	12/29/2022	1/3/2023	86	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1							
ICS-05-19 (0-0.5)	12/29/2022	1/3/2023	84	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1							
$ICS_{05-19}(0-0.5)$	12/29/2022	1/3/2023	87	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1							
ICS-05-20 (0-0.5)	12/29/2022	1/3/2023	88	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1							
EPA Standard	12/29/2022	11512025	00	~0.1	~0.1	~0.1	~0.1	~0.1	-0.1							
RDEC									10							

Notes:
I. Sample ID includes depth in inches collected below grade.
2. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
3. Analytical results are reported in milligrams per kilogram (mg/kg).
4. < denotes analyte was not detected above the laboratory detection limit.
5. Padl dilators on gradenage of the PDA cation lawal for unrestricted formers Site use

5. Bold indicates an exceedance of the EPA action level for unrestricted future Site use.

Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 SD indicates surrogate recovery percentage diluted below laboratory quantification limit.

8. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

	Table 1 - Concrete Floor and Ceiling Analytical Results														
Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclo- 1242	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs						
ICS-05-22 (0-0.5)	12/29/2022	1/3/2023	85	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1						
ICS-05-23 (0-0.5)	12/29/2022	1/3/2023	89	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1						
ICS-05-24 (0-0.5)	12/29/2022	1/3/2023	86	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1						
ICS-05-25 (0-0.5)	12/29/2022	1/3/2023	83	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1						
ICS-05-26 (0-0.5)	12/29/2022	1/3/2023	86	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1						
ICS-05-27 (0-0.5)	12/29/2022	1/3/2023	83	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1						
ICS-05-28 (0-0.5)	12/29/2022	1/3/2023	86	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1						
ICS-05-29 (0-0.5)	12/29/2022	1/3/2023	86	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1						
ICS-05-30 (0-0.5)	12/29/2022	1/6/2023	83	< 0.1	< 0.1	0.1	< 0.1	< 0.1	0.1						
EPA Standard									1						
RDEC									10						

Sample ID includes depth in inches collected below grade.
 Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
 Analytical results are reported in milligrams per kilogram (mg/kg).
 < denotes analyte was not detected above the laboratory detection limit.</li>
 Bold indicates an exceedance of the DPA action level for unrestricted future Site use.
 Bold indicates an exceedance of the areliable Matthed 1 # DPEC Objectives.

Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 SD indicates surrogate recovery percentage diluted below laboratory quantification limit.

8. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

	Sample Date	Analysis Date	Percentage	1254	Arocior- 1260	1268	Total PCBs
CW-01-01	5/28/2020	6/10/2020	89	0.5	0.3	< 0.1	0.8
CW-01-02	5/28/2020	6/10/2020	76	0.5	0.2	< 0.1	0.7
CW-01-03	5/28/2020	6/10/2020	86	< 0.1	< 0.1	< 0.1	< 0.1
CW-01-04	5/28/2020	6/10/2020	82	0.1	< 0.1	< 0.1	0.1
CW-01-05	5/28/2020	6/10/2020	79	< 0.1	< 0.1	< 0.1	< 0.1
CW-01-06	5/28/2020	6/10/2020	80	< 0.1	< 0.1	< 0.1	< 0.1
CW-01-07	5/28/2020	6/10/2020	89	< 0.1	0.1	< 0.1	0.1
CW-01-08	5/28/2020	6/10/2020	88	< 0.1	< 0.1	< 0.1	< 0.1
CW-01-09	5/28/2020	6/10/2020	82	< 0.1	< 0.1	< 0.1	< 0.1
CW-01-10	9/2/2020	9/9/2020	86	< 0.1	< 0.1	< 0.1	< 0.1
CW-01-11	9/2/2020	9/9/2020	81	0.2	< 0.1	< 0.1	0.2
CW-01-12	4/27/2021	5/6/2021	83	0.3	0.3	< 0.09	0.6
CW-02-01	1/27/2023	1/30/2023	81	< 0.09	< 0.09	< 0.09	< 0.09
CW-02-02	1/27/2023	1/30/2023	81	0.1	< 0.1	< 0.1	0.1
CW-02-03	1/27/2023	1/30/2023	83	< 0.09	< 0.09	< 0.09	< 0.09
CW-02-04	1/27/2023	1/30/2023	82	< 0.1	< 0.1	< 0.1	< 0.1
CW-02-05	1/27/2023	1/30/2023	80	< 0.1	< 0.1	< 0.1	< 0.1
CW-03-01	9/27/2019	10/7/2019	83	< 0.09	< 0.09	< 0.09	< 0.09
CW-03-02	9/27/2019	10/7/2019	94	< 0.1	0.6	< 0.1	0.6
CW-03-03	9/27/2019	10/7/2019	90	< 0.1	< 0.1	< 0.1	< 0.1
CW-03-04	5/28/2020	6/10/2020	89	< 0.1	0.5	< 0.1	0.5
CW-03-05	5/28/2020	6/10/2020	96	< 0.1	0.6	< 0.1	0.6
CW-04-01	1/3/2020	1/9/2020	61	< 0.1	< 0.1	< 0.1	< 0.1
CW-04-02	1/3/2020	1/9/2020	68	< 0.1	0.2	< 0.1	0.2
CW-04-03	1/3/2020	1/9/2020	65	< 0.1	< 0.1	< 0.1	< 0.1
CW-04-04	5/29/2020	6/10/2020	92	< 0.1	< 0.1	< 0.1	< 0.1
CW-04-05	9/2/2020	9/9/2020	80	< 0.1	< 0.1	< 0.1	< 0.1

RDEC Notes:

1. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.

2. Analytical results are reported in milligrams per kilogram (mg/kg).

3. < denotes analyte was not detected above the laboratory detection limit.

4. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

		Table	3 - Brick Wall Ana	lytical Resu	ılts		
Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclor- 1254	Aroclor- 1260	Aroclor- 1268	Total PCBs
BR-03-01	9/27/2019	10/3/2019	86	< 0.1	1.4	< 0.1	1.4
BR-03-02	9/27/2019	10/3/2019	84	< 0.09	0.4	< 0.09	0.4
BR-03-03	9/27/2019	10/3/2019	78	< 0.1	0.1	< 0.1	0.1
BR-03-04	9/27/2019	10/4/2019	84	< 0.09	0.2	< 0.2	0.2
BR-03-05	9/27/2019	10/4/2019	83	< 0.09	< 0.09	< 0.09	< 0.09
BR-03-06	9/27/2019	10/4/2019	80	< 0.1	0.2	< 0.1	0.2
BR-03-07	4/27/2021	5/5/2021	69	< 0.1	0.3	< 0.1	0.3
BR-03-08	4/27/2021	5/5/2021	85	< 0.09	0.2	< 0.09	0.2
BR-03-09	4/27/2021	5/5/2021	60	< 0.1	1.5	< 0.1	1.5
BR-03-10	9/2/2021	9/7/2021	87	< 0.1	0.5	< 0.1	0.5
Brick-04-01	9/2/2020	9/9/2020	74	< 0.1	< 0.1	< 0.1	< 0.1
BR-04-02	9/2/2021	9/7/2021	87	< 0.1	0.3	< 0.1	0.3
EPA Standar	d						1
RDEC							10
1. Surrogate dat	a is based on recove	ry percentage of an a	dded concentration of decach	lorobiphenyl.			

Surrogate data is based on recovery percentage of an added concentration of decathoroophenyl.

Table 4 - Paint Analytical Results																	
Sample ID	Description	Floor	Location	Substrate	Paint Layers	Total Cadmium	Total Chromium	Total Lead	Aroclor- 1242	Aroclor- 1248	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	Total PCBs Multiplied by Number of Paint Layers	Waste Classification
PS-100	Black Paint	3	East Hallway, West Wall	Brick	1	NT	NT	NT	<0.3	<0.3	<0.3	26.5	< 0.3	2.9	29.4	29.4	PCB Bulk Product Waste
PS-51	Black Paint	1	Turbine Room - Staircase	Metal	3	6.82	2,630	97,400	< 0.05	< 0.05	< 0.05	4.0	< 0.05	< 0.05	4.0	12	PCB Remediation Waste
PS-66	Black Paint	3	Room D: Lower OCB Room - Elevator Shaft Handrail	Metal	1	NT	NT	NT	<3.7	<3.7	<3.7	97.9	<3.7	<3.7	97.9	97.9	PCB Remediation Waste
PS-97	Black Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	9	< 0.1	0.7	9.7	9.7	PCB Remediation Waste
PS-98	Black Paint	3	East Hallway, West Wall	Brick	1	NT	NT	NT	< 0.09	< 0.09	< 0.09	7.3	< 0.09	< 0.09	7.3	7.3	PCB Remediation Waste
PS-99	Black Paint	3	East Hallway, East Wall	Brick	1	NT	NT	NT	<1.1	<1.1	<1.1	12.7	<1.1	<1.1	12.7	12.7	PCB Bulk Product Waste
PS-23	Black Paint Underlain by Red and Green Paint	2	Office 2 - South Baseboard	Wood	3	10.2	5,890	32,900	0.4	<0.1	1.8	2.4	< 0.1	0.5	4.2	12.6	PCB Bulk Product Waste
PS-39	Black Paint Underlain by Dark Green Paint	3	Room D: Lower OCB Room - Northwest Door	Metal	2	9.27	3,930	98,300	<4.8	<4.8	<4.8	84	<4.8	<4.8	84.0	168	PCB Remediation Waste
PS-247	Black Paint underlain by Green Paint underlain by White Paint	2	Store Room	Concrete	3	NT	NT	NT	2.9	< 0.1	<0.1	<0.1	3.5	<0.1	6.4	19.2	PCB Bulk Product Waste
PS-12	Brown Paint	1	Cable Vault - West Door to Elevator Shaft	Wood	1	6.12	6,910	35,800	< 0.05	< 0.05	3.2	3.6	< 0.05	< 0.05	6.8	6.8	PCB Remediation Waste
PS-181	Brown Paint	2	Room B: Main Switchboard Room - East Wall, Mid Wall	Metal	1	NT	NT	NT	<0.1	<0.1	3.8	<0.1	3.7	<0.1	7.5	7.5	PCB Remediation Waste
PS-182	Brown Paint	2	Room B: Main Switchboard Room - East Wall, Mid Wall	Metal	1	NT	NT	NT	<0.09	<0.09	2	< 0.09	3.2	< 0.09	5.2	5.2	PCB Remediation Waste
PS-48	Brown Paint	2	Room B: Main Switchboard Room - East Wall	Metal	1	NT	NT	NT	< 2.3	< 2.3	<2.3	2.9	<2.3	< 2.3	2.9	2.9	PCB Remediation Waste
PS-01	Dark Green Paint	1	Cable Vault - East Hallway, Southern Door	Metal	1	3.2	10,800	107,000	< 0.05	< 0.05	4.7	5.5	< 0.05	0.7	10.9	10.9	PCB Remediation Waste
PS-02	Dark Green Paint	1	Cable Vault - East Hallway, Lower Portion of Wall	Brick	1	3.52	8,710	50,600	< 0.05	< 0.05	5.1	1.6	< 0.05	0.3	7.0	7	PCB Bulk Product Waste
PS-07	Dark Green Paint	1	Cable Vault - Green Door	Metal	1	37.9	6,980	41,500	< 0.05	< 0.05	4.6	3.9	< 0.05	< 0.05	8.5	8.5	PCB Remediation Waste
PS-09	Dark Green Paint	1	Cable Vault - West Hallway, Green Door	Metal	1	3.83	7,610	82,300	< 0.05	< 0.05	4.5	3.3	< 0.05	0.8	8.6	8.6	PCB Remediation Waste
PS-10	Dark Green Paint	1	Cable Vault - West Hallway, Wall	Concrete	1	5.49	10,700	62,700	< 0.05	< 0.05	4.1	3.8	< 0.05	< 0.05	7.9	7.9	PCB Bulk Product Waste
PS-110	Dark Green Paint	3	Room C: Lower OCB Potential Transformer Room - West Wall	Brick	1	NT	NT	NT	<0.09	<0.09	1.9	2.5	<0.09	<0.09	4.4	4.4	PCB Bulk Product Waste
PS-112	Dark Green Paint	3	Room C: Lower OCB Potential Transformer Room - West Wall	Brick	1	NT	NT	NT	<0.3	< 0.3	3.2	4.0	<0.3	<0.3	7.2	7.2	PCB Bulk Product Waste
PS-113	Dark Green Paint	1	Room 2 - South Wall	Concrete	1	NT	NT	NT	< 0.09	< 0.09	2.7	2.1	< 0.09	0.3	5.1	5.1	PCB Bulk Product Waste
PS-115	Dark Green Paint	1	Room 7 - South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	2.2	1.8	< 0.1	0.2	4.2	4.2	PCB Bulk Product Waste
PS-117	Dark Green Paint	1	Room 9 - South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	3.7	2.1	< 0.1	< 0.1	5.8	5.8	PCB Bulk Product Waste
PS-125	Dark Green Paint	4	Mezzanine Room - West Wall	Concrete	1	NT	NT	NT	0.2	0.2	< 0.1	6.9	< 0.1	< 0.1	7.1	7.1	PCB Bulk Product Waste
PS-139	Dark Green Paint	4	Mezzanine Railing	Steel	1	14.2	7,200	53,200	< 0.1	< 0.1	6.0	10.3	< 0.1	< 0.1	16.3	16.3	PCB Remediation Waste
PS-14	Dark Green Paint	1	Cable Vault - Stairs	Concrete	1	23.0	3,470	24,500	< 0.05	< 0.05	6.8	18.5	< 0.05	< 0.05	25.3	25.3	PCB Remediation Waste
PS-140	Dark Green Paint	4	Mezzanine Railing	Steel	1	NT	NT	NT	< 0.1	< 0.1	5.6	9.3	< 0.1	< 0.1	14.9	14.9	PCB Remediation Waste
PS-141	Dark Green Paint	4	Mezzanine Railing	Steel	1	NT	NT	NT	< 0.1	< 0.1	5.4	7.5	< 0.1	< 0.1	12.9	12.9	PCB Remediation Waste
PS-143	Dark Green Paint	1	Cable Vault - East Hallway, Lower Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	2.3	1.8	< 0.1	< 0.1	4.1	4.1	PCB Bulk Product Waste
PS-145	Dark Green Paint	1	Cable Vault - East Hallway, Mid Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	2.4	1.8	< 0.1	< 0.1	4.2	4.2	PCB Bulk Product Waste
PS-146	Dark Green Paint	1	Cable Vault - East Hallway, Mid Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	2.2	1.6	< 0.1	< 0.1	3.8	3.8	PCB Bulk Product Waste
PS-148	Dark Green Paint	1	Cable Vault - East Hallway, Lower Wall	Concrete	1	NT	NT	NT	<0.1	< 0.1	1.8	1.3	< 0.1	< 0.1	3.1	3.1	PCB Bulk Product Waste
PS-151	Dark Green Paint	1	Cable Vault - East Hallway, Upper Wall	Brick	1	NT	NT	NT	<0.1	< 0.1	0.6	0.2	< 0.1	< 0.1	0.8	0.8	PCB Bulk Product Waste
PS-153	Dark Green Paint	1	Cable Vault - East Hallway, Mid Wall	Brick	1	NT	NT	NT	< 0.09	< 0.09	3.1	1.6	< 0.09	0.4	5.1	5.1	PCB Bulk Product Waste
PS-154	Dark Green Paint	1	Cable Vault - East Hallway, Lower Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	2.7	1	< 0.1	<0.1	3.7	3.7	PCB Bulk Product Waste
PS-17	Dark Green Paint	2	Landing - Stair Handrail	Metal	1	9.89	14,100	81,200	< 0.05	< 0.05	< 0.05	45.0	< 0.05	< 0.05	45.0	45	PCB Remediation Waste
Disposal Action	Level					20	100	100							1		
EPA Standard															1		
RDEC	10 10																
<ol> <li>Concentrations a</li> <li>Bold indicates ar</li> <li>Red indicates an</li> <li><i ar<="" ndicates="" p="" the=""></i></li> <li>NT indicates not</li> <li><i>Italics</i> indicates</li> <li>TePA action level</li> <li>Method 1 Reside</li> </ol>	Notes: . Concentrations are presented in milligrams per kilogram (mg/kg). . Bold indicates an exceedance of the applicable Disposal Action Level. 3. Red indicates an exceedance of the applicable Method 1 RDEC Objective. 4. < indicates the analyte was not detected above the specified laboratory detection limit. 5. NT indicates not tested for the specified laboratory detection limit exceeds the EPA action level for unrestricted future Site uses. 7. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61. 8. Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.																

Table 4 - Paint Analytical Results																	
Sample ID	Description	Floor	Location	Substrate	Paint Layers	Total Cadmium	Total Chromium	Total Lead	Aroclor- 1242	Aroclor- 1248	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	Total PCBs Multiplied by Number of Paint Layers	Waste Classification
PS-185	Dark Green Paint	3	Room C: Lower OCB Potential Transformer Room - East Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.1	<0.1	3.4	5.3	<0.1	<0.1	8.7	8.7	PCB Bulk Product Waste
PS-186	Dark Green Paint	3	Room C: Lower OCB Potential Transformer Room - East Wall, Lower Wall	Brick	1	NT	NT	NT	<0.1	< 0.1	3.2	5.5	<0.1	<0.1	8.7	8.7	PCB Bulk Product Waste
PS-189	Dark Green Paint	3	Room D: Lower OCB Room - North Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.09	< 0.09	2.9	10	< 0.09	< 0.09	12.9	12.9	PCB Bulk Product Waste
PS-190	Dark Green Paint	3	Room D: Lower OCB Room - North Wall, Upper Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	2.5	9.2	< 0.1	< 0.1	11.7	11.7	PCB Bulk Product Waste
PS-194	Dark Green Paint	3	Room D: Lower OCB Room - West Wall, Lower Wall	Brick	1	NT	NT	NT	< 0.2	< 0.2	3.6	5.7	< 0.2	< 0.2	9.3	9.3	PCB Bulk Product Waste
PS-204	Dark Green Paint	4	Room E: Potential Transformer Upper - West Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.09	<0.09	1.4	0.7	<0.9	<0.9	2.1	2.1	PCB Bulk Product Waste
PS-219	Dark Green Paint	5	Lighting Arrestor Room - West Wall, Lower Wall	Metal	1	NT	NT	NT	< 0.09	< 0.09	1	1	< 0.09	<0.9	2.0	2	PCB Remediation Waste
PS-220	Dark Green Paint	5	Lighting Arrestor Room - West Wall, Mid Wall	Metal	1	NT	NT	NT	< 0.1	< 0.1	1.1	1.7	< 0.1	< 0.1	2.8	2.8	PCB Remediation Waste
PS-236	Dark Green Paint	1	Room 5, South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	1.0	0.8	< 0.1	< 0.1	1.8	1.8	PCB Bulk Product Waste
PS-238	Dark Green Paint	1	Room 6, North Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	2.0	1.7	< 0.1	< 0.1	3.7	3.7	PCB Bulk Product Waste
PS-240	Dark Green Paint	1	Room 8, South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	1.5	1.4	< 0.1	< 0.1	1.9	1.9	PCB Bulk Product Waste
PS-244	Dark Green Paint	2	Reactor Room, West Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	2.4	1.6	< 0.1	0.7	4.7	4.7	PCB Bulk Product Waste
PS-245	Dark Green Paint	2	Reactor Room, West Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	4.1	3.1	< 0.1	1.6	9.0	9	PCB Bulk Product Waste
PS-265	Dark Green Paint	3	Room D: Lower Oil Circuit Breaker Room, South Wall	Brick	1	9.5	5,690	21,600	< 0.09	< 0.09	3.2	11.4	< 0.09	< 0.09	14.6	14.6	PCB Bulk Product Waste
PS-266	Dark Green Paint	3	Room D: Lower Oil Circuit Breaker Room, South Wall	Brick	1	3.58	4,090	19,600	< 0.09	< 0.09	2.2	7.7	< 0.09	< 0.09	9.9	9.9	PCB Bulk Product Waste
PS-29	Dark Green Paint	2	Room A: Reactor Room - East Wall Behind Air Ducts	Brick	1	6.52	10,400	66,100	<2.6	<2.6	4.8	<2.6	<2.6	<2.6	4.8	4.8	PCB Bulk Product Waste
PS-35	Dark Green Paint	3	East Hallway - West Wall	Concrete	1	38.5	3,460	43,500	< 0.05	< 0.05	< 0.05	11.8	< 0.05	< 0.05	11.8	11.8	PCB Remediation Waste
PS-40	Dark Green Paint	3	Room D: Lower OCB Room - Storage Cabinet	Metal	1	<7.69	19,900	97,200	< 0.5	< 0.5	< 0.5	49.8	< 0.5	< 0.5	49.8	49.8	PCB Remediation Waste
PS-45	Dark Green Paint	5	Room G: Upper Breaker Floor - Door	Wood	1	2.48	5,560	61,500	< 0.05	< 0.05	1.6	3.3	< 0.05	< 0.05	4.9	4.9	PCB Remediation Waste
PS-54	Dark Green Paint	3	Room C: Lower OCB Potential Transformer Room - South Wall	Brick	1	NT	NT	NT	< 0.05	< 0 05	< 0 05	3.8	< 0.05	< 0 05	3.8	3.8	PCB Bulk Product Waste
PS-55	Dark Green Paint	3	Room C: Lower OCB Potential Transformer Room - West Wall	Concrete	1	NT	NT	NT	< 0.08	< 0.08	< 0.08	8.7	< 0.08	<0.08	8.7	8.7	PCB Bulk Product Waste
PS-56	Dark Green Paint	4	Landing - Stair Handrail	Metal	1	NT	NT	NT	<6.2	<6.2	<6.2	138.0	<6.2	<6.2	138.0	138	PCB Remediation Waste
PS-65	Dark Green Paint	3	Room D: Lower OCB Room - West Cabinet	Metal	1	NT	NT	NT	<2.1	<2.1	<2.1	44.6	<2.1	<2.1	44.6	44.6	PCB Remediation Waste
PS-67	Dark Green Paint	3	Room D: Lower OCB Room - Center Wall	Concrete	1	NT	NT	NT	< 0.05	< 0.05	< 0.05	10.0	< 0.05	< 0.05	10.0	10	PCB Bulk Product Waste
PS-69	Dark Green Paint	1	Turbine Room - Steel Beam	Metal	1	NT	NT	NT	< 0.05	< 0.05	< 0.05	4.9	< 0.05	< 0.05	4.9	4.9	PCB Remediation Waste
PS-126	Dark Green Paint	1	Room 9 - Locker Room & Toilet	Concrete	1	NT	NT	NT	< 0.1	< 0.1	2.9	1.5	< 0.1	< 0.1	4.4	4.4	PCB Bulk Product Waste
PS-127	Dark Green Paint	1	Room 9 - Locker Room & Toilet	Concrete	1	NT	NT	NT	< 0.1	< 0.1	3.5	2.0	< 0.1	< 0.1	5.5	5.5	PCB Bulk Product Waste
PS-128	Dark Green Paint	1	Room 9 - Locker Room & Toilet	Concrete	1	NT	NT	NT	< 0.1	< 0.1	2.9	1.3	< 0.1	< 0.1	4.2	4.2	PCB Bulk Product Waste
PS-129	Dark Green Paint	1	Room 9 - Locker Room & Toilet	Concrete	1	NT	NT	NT	< 0.1	< 0.1	3.9	1.6	< 0.1	< 0.1	5.5	5.5	PCB Bulk Product Waste
PS-133	Dark Green Paint	3	Room D - Lower Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	2.2	2.2	< 0.1	< 0.1	4.4	4.4	PCB Bulk Product Waste
PS-193	Dark Green Paint	3	Room D: Lower OCB Room - West Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	2.7	3.8	< 0.1	< 0.1	6.5	6.5	PCB Bulk Product Waste
PS-201	Dark Green Paint	4	Room F: Main Bus Room - West Wall, North Wall, and Mid Wall	Brick	1	NT	NT	NT	<0.1	<0.1	3.4	2.8	<0.1	<0.1	6.2	6.2	PCB Bulk Product Waste
PS-202	Dark Green Paint	4	Room F: Main Bus Room - West Wall, North Wall, and Lower Wall	Brick	1	NT	NT	NT	<0.1	<0.1	2.1	2	<0.1	<0.1	4.1	4.1	PCB Bulk Product Waste
PS-203	Dark Green Paint	4	Room E: Potential Transformer Upper - West Wall, Lower Wall	Brick	1	NT	NT	NT	< 0.09	<0.09	1.2	0.8	< 0.09	<0.09	2.0	2	PCB Bulk Product Waste
PS-209	Dark Green Paint	5	Room G: Upper Breaker Floor - West Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	1.3	1.9	< 0.1	< 0.1	3.2	3.2	PCB Bulk Product Waste
Disposal Action Level						20	100	100							1		
EPA Standard															1		
RDEC															10		
Notasi																	

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C. Will instruments the first the provide applicable.

5. NT indicates not tested for the specific analyte.

6. *Italics* indicates the specified laboratory detection limit exceeds the EPA action level for unrestricted future Site use.

7. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.
 8. Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

	Table 4 - Paint Analytical Results																
Sample ID	Description	Floor	Location	Substrate	Paint Layers	Total Cadmium	Total Chromium	Total Lead	Aroclor- 1242	Aroclor- 1248	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	Total PCBs Multiplied by Number of Paint Layers	Waste Classification
PS-210	Dark Green Paint	5	Room G: Upper Breaker Floor - West Wall, Lower Wall	Brick	1	NT	NT	NT	<0.1	<0.1	0.5	0.8	<0.1	<0.1	1.3	1.3	PCB Bulk Product Waste
PS-213	Dark Green Paint	5	Room G: Upper Breaker Floor - West Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	1.6	2.4	< 0.1	< 0.1	4.0	4	PCB Bulk Product Waste
PS-214	Dark Green Paint	5	Room G: Upper Breaker Floor - West Wall, Lower Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	1.5	2	<0.1	<0.1	3.5	3.5	PCB Bulk Product Waste
PS-215	Dark Green Paint	5	Lighting Arrestor Room - East Wall, Lower Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	2	2.7	< 0.1	< 0.1	4.7	4.7	PCB Bulk Product Waste
PS-216	Dark Green Paint	5	Lighting Arrestor Room - North Wall, Mid Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	0.9	1.2	< 0.1	< 0.1	2.1	2.1	PCB Bulk Product Waste
PS-157	Dark Green Paint underlain by Dark Green Paint	1	Room 9 - Locker Room & Toilet, Mid Wall	Concrete	2	NT	NT	NT	< 0.1	<0.1	3.8	1.3	<0.1	<0.1	5.1	10.2	PCB Bulk Product Waste
PS-158	Dark Green Paint underlain by Dark Green Paint	1	Room 9 - Locker Room & Toilet, Lower Wall	Concrete	2	NT	NT	NT	<0.1	<0.1	4.6	1.2	<0.1	< 0.1	5.8	11.6	PCB Bulk Product Waste
PS-116	Gray Paint	1	Room 7- South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	1.3	0.7	< 0.1	< 0.1	2.0	2	PCB Bulk Product Waste
PS-13	Gray Paint	1	Cable Vault - Elevator Shaft Wall	Concrete	1	<4.17	178	964	< 0.05	< 0.05	0.3	0.4	< 0.05	< 0.05	0.7	0.7	PCB Bulk Product Waste
PS-176	Gray Paint	2	Room A: Reactor Room - Cabinet	Composite	1	NT	NT	NT	< 0.1	< 0.1	3.2	< 0.1	2.6	< 0.1	5.8	5.8	PCB Remediation Waste
PS-229	Gray Paint	1	Room 1, North Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	2.2	2.8	< 0.1	< 0.1	5	5	PCB Bulk Product Waste
PS-230	Gray Paint	1	Room 1, North Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	1.6	1.8	< 0.1	< 0.1	3.4	3.4	PCB Bulk Product Waste
PS-231	Gray Paint	1	Room 3, South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	1.3	0.8	< 0.1	< 0.1	2.1	2.1	PCB Bulk Product Waste
PS-232	Gray Paint	1	Room 3, South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	0.9	0.5	< 0.1	< 0.1	1.4	1.4	PCB Bulk Product Waste
PS-233	Gray Paint	1	Room 4, South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	0.6	0.5	< 0.1	< 0.1	1.1	1.1	PCB Bulk Product Waste
PS-234	Gray Paint	1	Room 4, South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	0.5	0.2	< 0.1	< 0.1	0.7	0.7	PCB Bulk Product Waste
PS-24	Gray Paint	2	Room A: Reactor Room - Cabinet	Composite	1	140	8.48	77,900	< 0.05	< 0.05	1.1	0.9	< 0.05	0.3	2.4	2.4	PCB Remediation Waste
PS-253	Gray Paint	3	Stairwell Into 4th floor	Brick	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	27	< 0.1	< 0.1	27	27	PCB Bulk Product Waste
PS-267	Gray Paint	Exterior	Exterior South - Fire Escape	Metal	1	5.49	7,410	28,900	< 0.09	< 0.09	1.8	9.9	< 0.09	< 0.09	11.7	11.7	PCB Remediation Waste
PS-268	Gray Paint	Exterior	Exterior South - Fire Escape	Metal	1	4.89	8,010	33,100	< 0.1	< 0.1	0.9	2.3	< 0.1	< 0.1	3.2	3.2	PCB Remediation Waste
PS-27	Gray Paint	2	Room A: Reactor Room - Concrete Shelf	Concrete	1	7.39	4,150	23,600	< 0.8	< 0.8	3.5	3.2	< 0.8	1	7.7	7.7	PCB Bulk Product Waste
PS-47	Gray Paint	3	Room D: Lower OCB - West Hallway, West Wall	Brick	1	NT	NT	ŃT	<1.4	<1.4	<1.4	11.6	<1.4	5.6	17.2	17.2	PCB Bulk Product Waste
PS-04	Gray Paint Underlain by Black and Red Paint	1	Cable Vault - Cabinet Doors	Composite	3	588	21.7	64,900	< 0.05	< 0.05	10.4	3.8	<0.05	< 0.05	14.2	42.6	PCB Remediation Waste
PS-36	Gray Paint Underlain by Light Tan Paint	3	East Hallway - West Wall	Brick	2	80.5	14.0	7,880	< 0.08	< 0.08	< 0.08	9.5	< 0.08	< 0.08	9.5	19	PCB Remediation Waste
PS-42	Gray Paint Underlain by Light Tan Paint	4	Room F: Main Bus Room - West Wall	Brick	2	289	4.52	403	< 0.05	< 0.05	1.6	3.5	< 0.05	< 0.05	5.1	10.2	PCB Bulk Product Waste
PS-49	Gray Paint Underlain by White Paint	1	Turbine Room - Concrete Structure	Concrete	2	19.0	1,050	15,700	< 0.05	< 0.05	1.0	0.9	< 0.05	0.2	2.1	4.2	PCB Bulk Product Waste
PS-223	Gray Paint Underlain by White Paint Underlain by Green Paint	1	Turbine Room - Concrete Structure	Concrete	3	NT	NT	NT	<0.1	<0.1	1.2	0.9	<0.1	<0.1	2.1	6.3	PCB Bulk Product Waste
PS-224	Gray Paint Underlain by White Paint Underlain by Green Paint	1	Turbine Room - Concrete Structure	Concrete	3	NT	NT	NT	< 0.1	<0.1	1.3	0.6	<0.1	<0.1	1.9	5.7	PCB Bulk Product Waste
PS-225	Gray Paint Underlain by White Paint Underlain by Green Paint	1	Turbine Room - Concrete Structure	Concrete	3	NT	NT	NT	< 0.1	< 0.1	1.2	1	<0.1	<0.1	2.2	6.6	PCB Bulk Product Waste
PS-103	Light Green Paint	3	East Hallway, West Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	31.6	< 0.1	< 0.1	31.6	31.6	PCB Bulk Product Waste
PS-104	Light Green Paint	3	East Hallway, West Wall	Brick	1	NT	NT	NT	< 0.3	< 0.3	< 0.3	64.2	<0.3	< 0.3	64.2	64.2	PCB Bulk Product Waste
PS-107	Light Green Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	24.7	< 0.1	< 0.1	24.7	24.7	PCB Remediation Waste
PS-108	Light Green Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	21.6	< 0.1	< 0.1	21.6	21.6	PCB Remediation Waste
PS-123	Light Green Paint	4	Mezzanine Room - West Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	3.3	< 0.1	< 0.1	3.3	3.3	PCB Bulk Product Waste
PS-130	Light Green Paint	1	Front Entry, Lower Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	6.6	10.1	< 0.1	< 0.1	16.7	16.7	PCB Bulk Product Waste
Disposal Action	Level					20	100	100							1		
EPA Standard															1		
RDEC															10		

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	Table 4 - Paint Analytical Results																
Sample ID	Description	Floor	Location	Substrate	Paint Layers	Total Cadmium	Total Chromium	Total Lead	Aroclor- 1242	Aroclor- 1248	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	Total PCBs Multiplied by Number of Paint Layers	Waste Classification
PS-135	Light Green Paint	2	Room B - Battery Box	Steel	1	NT	NT	NT	< 0.1	< 0.1	2.5	3.3	< 0.1	<0.1	6.0	6	PCB Bulk Product Waste
PS-138	Light Green Paint	4	Stairwell Into 4th floor	Concrete	1	NT	NT	NT	< 0.1	< 0.1	3.3	10.0	< 0.1	< 0.1	13.3	13.3	PCB Bulk Product Waste
PS-15	Light Green Paint	1	Locker Room - Foyer, Lower Wall	Concrete	1	1.98	9,250	49,800	< 0.05	< 0.05	< 0.05	12.7	< 0.05	< 0.05	12.7	12.7	PCB Bulk Product Waste
PS-174	Light Green Paint	2	Room A: Reactor Room - North Wall, Lower Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	2.3	2.1	< 0.1	2.4	6.8	6.8	PCB Bulk Product Waste
PS-177	Light Green Paint	2	Room B: Main Switchboard Room - West Wall, Lower Wall	Brick	1	NT	NT	NT	<0.1	< 0.1	2.7	5.7	<0.1	2.8	11.2	11.2	PCB Bulk Product Waste
PS-178	Light Green Paint	2	Room B: Main Switchboard Room - West Wall, Mid Wall	Brick	1	NT	NT	NT	<0.09	< 0.09	2.8	7.9	< 0.09	2.4	13.1	13.1	PCB Bulk Product Waste
PS-197	Light Green Paint	4	Battery Room - West Wall, Mid Wall	Metal	1	NT	NT	NT	< 0.09	< 0.09	0.6	0.8	< 0.09	< 0.09	1.4	1.4	PCB Remediation Waste
PS-226	Light Green Paint	1	Front Entry, West Wall, Lower Wall	Concrete	1	NT	NT	NT	< 0.09	< 0.09	2.9	5.8	< 0.09	< 0.1	8.7	8.7	PCB Bulk Product Waste
PS-249	Light Green Paint	2	Store Room	Metal	1	NT	NT	NT	< 0.09	< 0.09	2.6	< 0.09	3.2	< 0.09	5.8	5.8	PCB Remediation Waste
PS-43	Light Green Paint	5	Mezzanine - South Wall	Brick	1	76.3	2,870	35,900	< 0.05	< 0.05	1.1	1.6	< 0.05	0.3	3.0	3	PCB Bulk Product Waste
PS-64	Light Green Paint	3	East Hallway - East Wall	Concrete	1	NT	NT	NT	<1.0	<1.0	<1.0	10.4	<1.0	<1.0	10.4	10.4	PCB Bulk Product Waste
PS-72	Light Green Paint	3	East Hallway, West Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	13	< 0.1	1.3	14.3	14.3	PCB Remediation Waste
PS-75	Light Green Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.5	< 0.5	< 0.5	38.5	< 0.5	5	43.5	43.5	PCB Remediation Waste
PS-85	Light Green Paint	3	East Hallway, East Wall	Steel	1	NT	NT	NT	< 0.2	< 0.2	< 0.2	20.4	< 0.2	< 0.2	20.4	20.4	PCB Bulk Product Waste
PS-86	Light Green Paint	3	East Hallway, East Wall	Steel	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	20.3	< 0.1	2	22.3	22.3	PCB Bulk Product Waste
PS-90	Light Green Paint	3	East Hallway, West Wall	Brick	1	NT	NT	NT	< 0.2	< 0.2	< 0.2	20.2	< 0.2	2.3	22.5	22.5	PCB Bulk Product Waste
PS-93	Light Green Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.4	< 0.4	< 0.4	7.5	< 0.4	< 0.4	7.5	7.5	PCB Bulk Product Waste
PS-94	Light Green Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.4	< 0.4	< 0.4	9.3	<0.4	1.3	10.6	10.6	PCB Bulk Product Waste
PS-96	Light Green Paint	3	East Hallway, South Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	6.7	< 0.1	< 0.1	6.7	6.7	PCB Bulk Product Waste
PS-137	Light Green Paint	5	Mezzanine - Lower Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	2.1	2.4	< 0.1	< 0.1	4.5	4.5	PCB Bulk Product Waste
PS-173	Light Green Paint	2	Room A: Reactor Room - North Wall, Mid Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	1.7	1.4	< 0.1	1.7	4.8	4.8	PCB Bulk Product Waste
PS-198	Light Green Paint	4	Battery Room - West Wall, Upper Wall	Metal	1	NT	NT	NT	< 0.1	< 0.1	1.1	1.1	< 0.1	< 0.1	2.2	2.2	PCB Remediation Waste
PS-161	Light Green Paint Underlain by Dark Green Paint	1	Locker Room - Foyer, Mid Wall	Concrete	2	NT	NT	NT	<0.1	< 0.1	2.9	7.6	<0.1	<0.1	10.5	21	PCB Bulk Product Waste
PS-162	Light Green Paint Underlain by Dark Green Paint	1	Locker Room - Foyer, Lower Wall	Concrete	2	NT	NT	NT	<0.09	< 0.09	2	4.6	< 0.09	<0.09	6.6	13.2	PCB Bulk Product Waste
PS-228	Light Green Paint Underlain by Dark Green Paint	3	East Hallway - North Wall, Lower Wall	Brick	2	NT	NT	NT	<0.1	< 0.1	16.8	34.9	<0.1	< 0.1	51.7	103.4	PCB Remediation Waste
PS-33	Light Green Paint Underlain by Dark Green Paint	2	Room B: Main Switchboard Room - North Wall	Concrete	2	139	4,210	44,700	< 0.05	< 0.05	1.7	5.0	< 0.05	2.2	8.9	17.8	PCB Bulk Product Waste
PS-57	Light Green Paint Underlain by Dark Green Paint	Exterior	Northern Exterior - Door	Wood	2	NT	NT	NT	<0.09	< 0.09	<0.09	0.8	< 0.09	<0.09	0.8	1.6	PCB Remediation Waste
PS-76	Light Green Paint Underlain by Dark Green Paint	3	East Hallway, East Wall	Concrete	2	NT	NT	NT	<0.3	<0.3	<0.3	24.6	<0.3	2.8	27.4	54.8	PCB Remediation Waste
PS-79	Light Green Paint Underlain by Dark Green Paint	3	East Hallway, West Wall	Tan Brick	2	NT	NT	NT	<0.4	<0.4	<0.4	27.5	<0.4	2.6	30.1	60.2	PCB Bulk Product Waste
PS-80	Light Green Paint Underlain by Dark Green Paint	3	East Hallway, West Wall	Tan Brick	2	NT	NT	NT	<0.5	<0.5	<0.5	53.3	<0.5	<0.5	53.3	106.6	PCB Bulk Product Waste
PS-89	Light Green Paint Underlain by Dark Green Paint	3	East Hallway, West Wall	Brick	2	NT	NT	NT	<0.2	<0.2	<0.2	20.8	<0.2	2.4	23.2	46.4	PCB Bulk Product Waste
Disposal Action Leve	el					20	100	100							1		
EPA Standard															1		
RDEC															10		
Notes:																	

Notes: 1. Concentrations are presented in milligrams per kilogram (mg/kg). 2. Bold indicates an exceedance of the applicable Disposal Action Level. 3. Red indicates an exceedance of the applicable Method 1 RDEC Objective. 4. < indicates the analyte was not detected above the specified laboratory detection limit.

5. NT indicates not tested for the specific analyte.

6. *Italics* indicates the specified laboratory detection limit exceeds the EPA action level for unrestricted future Site use.

7. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.
 8. Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

	Table 4 - Paint Analytical Results																
Sample ID	Description	Floor	Location	Substrate	Paint Layers	Total Cadmium	Total Chromium	Total Lead	Aroclor- 1242	Aroclor- 1248	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	Total PCBs Multiplied by Number of Paint Layers	Waste Classification
PS-21	Light Green Paint Underlain by White and Black Paint	2	Office 3 - North Wall	Concrete	3	10.3	9,400	60,400	< 0.05	< 0.05	3.2	4.9	< 0.05	1.1	9.2	27.6	PCB Bulk Product Waste
PS-165	Light Green Paint Underlain by Brown Paint	2	Office 2 - South Wall, Mid Wall	Concrete	2	NT	NT	NT	< 0.1	< 0.1	2.3	< 0.1	2.7	< 0.1	5.0	10	PCB Bulk Product Waste
PS-166	Light Green Paint Underlain by Brown Paint	2	Office 2 - South Wall, Lower Wall	Concrete	2	NT	NT	NT	< 0.1	< 0.1	2.2	< 0.1	2.8	< 0.1	5.0	10	PCB Bulk Product Waste
PS-58	Light Green Paint Underlain by Green Paint	Exterior	Northern Exterior - Handrail	Metal	2	NT	NT	NT	< 0.06	< 0.06	1.2	1.5	< 0.06	0.5	3.2	6.4	PCB Remediation Waste
PS-68	Light Green Paint Underlain by Green Paint	Exterior	Exterior South - Fire Escape	Metal	2	NT	NT	NT	< 0.3	< 0.3	< 0.3	2.6	< 0.3	< 0.3	2.6	5.2	PCB Remediation Waste
PS-22	Light Green Paint Underlain by White Paint	2	Office 2 - West Wall, Former Cabinet Marking	Concrete	2	18.4	4,880	32,100	< 0.3	< 0.3	0.9	1.1	< 0.3	< 0.3	2.0	4	PCB Bulk Product Waste
PS-50	Light Green Paint Underlain by White Paint	1	Turbine Room - West Wall	Concrete	2	18.4	4,400	111,000	< 0.05	< 0.05	1.8	3.6	< 0.05	0.4	5.8	11.6	PCB Bulk Product Waste
PS-70	Light Green Paint Underlain by White Paint	3	East Hallway, North Wall	Brick	2	NT	NT	NT	< 0.1	< 0.1	< 0.1	31.1	< 0.1	3	34.1	68.2	PCB Remediation Waste
PS-71	Light Green Paint Underlain by White Paint	3	East Hallway, North Wall	Brick	2	NT	NT	NT	<2.1	<2.1	<2.1	44.1	<2.1	6.9	51	102	PCB Remediation Waste
PS-73	Light Green Paint Underlain by White Paint	3	East Hallway, West Wall	Tan Brick	2	NT	NT	NT	<0.4	<0.4	<0.4	30.8	<0.4	2.8	33.6	67.2	PCB Remediation Waste
PS-169	Light Green Paint Underlain by White Paint Underlain by Dark Green Paint	2	Office 3 - West Wall, Mid Wall	Brick	3	NT	NT	NT	<0.1	< 0.1	3.5	4.1	<0.1	1.3	8.9	26.7	PCB Bulk Product Waste
PS-227	Light Green Paint Underlain by White Paint Underlain by Green Paint	3	East Hallway - North Wall, Mid Wall	Brick	3	NT	NT	NT	< 0.09	< 0.09	12.2	27.8	< 0.09	<0.1	40	120	PCB Remediation Waste
PS-170	Light Green Underlain by White Paint	2	Office 3 - West Wall, Lower Wall	Brick	2	NT	NT	NT	< 0.3	< 0.3	2.2	< 0.3	1.8	< 0.3	4.0	8	PCB Bulk Product Waste
PS-175	Orange Paint	2	Room A: Reactor Room - Cabinet	Composite	1	NT	NT	NT	< 0.1	< 0.1	7.8	6.6	< 0.1	< 0.1	14.3	14.3	PCB Remediation Waste
PS-25	Orange Paint	2	Room A: Reactor Room - Cabinet	Composite	1	10.3	8,390	62,700	< 0.07	< 0.07	1.9	1.7	< 0.07	0.5	4.1	4.1	PCB Remediation Waste
PS-37	Orange Paint	3	Room C: Lower OCB Potential Transformer Room - West Wall Cabinet	Metal	1	<3.23	23,600	101,000	<1.1	<1.1	<1.1	<1.1	<1.1	<1.1	<1.1	<1.1	PCB Remediation Waste
PS-05	Orange Paint Underlain by Black and Red Paint	1	Cable Vault - Cabinet Doors	Composite	3	12.0	26,100	88,800	< 0.05	< 0.05	7.4	5.1	< 0.05	< 0.05	12.5	37.5	PCB Remediation Waste
PS-46	Pink Paint	4	Mezzanine - Temporary Wall to Stairwell	Wood	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	3.4	< 0.1	< 0.1	3.4	3.4	PCB Remediation Waste
PS-28	Red Paint	2	Room A: Reactor Room - Fire Extinguisher Marking	Brick	1	<45.5	11,400	64,100	<22.7	<22.7	<22.7	<22.7	<22.7	<22.7	<22.7	<22.7	PCB Bulk Product Waste
PS-18	Tan Paint Underlain by White and Light Green Paint	2	Office 1 - West Wall	Brick	3	5.46	4,010	21,800	< 0.05	< 0.05	1.7	3.1	< 0.05	0.6	5.4	16.2	PCB Bulk Product Waste
PS-34	Tan Paint Underlain by Yellow, Red, and Black Paint	2	Room B: Main Switchboard Room - East Wall	Concrete	3	9.44	10,400	47,200	< 0.05	< 0.05	3.1	7.0	< 0.05	1.8	11.9	35.7	PCB Bulk Product Waste
PS-261	Tan Paint Underlain by White Paint	2	Office 1, South Wall, Upper Wall	Concrete	2	8.96	8.5	42.4	< 0.1	1.3	< 0.1	< 0.1	2.7	< 0.1	4.0	8	PCB Bulk Product Waste
PS-262	Tan Paint Underlain by White Paint	2	Office 1, East Wall, Upper Wall	Concrete	2	7.77	6.65	94.4	< 0.1	1.0	< 0.1	< 0.1	2.1	< 0.1	3.1	6.2	PCB Bulk Product Waste
PS-263	Tan Paint Underlain by White Paint	2	Office 1, North Wall, Upper Wall	Concrete	2	9.9	6.53	76.8	< 0.1	1.5	< 0.1	< 0.1	2.3	< 0.1	3.8	7.6	PCB Bulk Product Waste
PS-264	Tan Paint Underlain by White Paint	2	Office 1, North Wall, Upper Wall	Concrete	2	8.87	5.66	42.0	< 0.1	1.1	< 0.1	< 0.1	1.7	< 0.1	2.8	5.6	PCB Bulk Product Waste
PS-03	White Paint	1	Cable Vault - East Hallway, Upper Portion of Wall	Brick	1	10.1	<3.7	175	< 0.05	< 0.05	1.3	0.5	< 0.05	< 0.05	1.8	1.8	PCB Bulk Product Waste
PS-105	White Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	13.2	< 0.1	< 0.1	13.2	13.2	PCB Remediation Waste
PS-106	White Paint	3	West Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.2	< 0.2	< 0.2	21.2	< 0.2	<0.2	21.2	21.2	PCB Remediation Waste
PS-109	White Paint	3	Room C: Lower OCB Potential Transformer Room - West Wall	Brick	1	NT	NT	NT	< 0.09	<0.09	3.0	2.5	<0.09	<0.09	5.5	5.5	PCB Remediation Waste
PS-11	White Paint	1	Cable Vault - West Hallway, Wall	Concrete	1	22.0	40.8	572	< 0.05	< 0.05	2.4	1.6	< 0.05	< 0.05	4.0	4	PCB Bulk Product Waste
PS-111	White Paint	3	Room C: Lower OCB Potential Transformer Room - West Wall	Brick	1	NT	NT	NT	<0.1	<0.1	2.4	2.5	<0.1	< 0.1	4.9	4.9	PCB Bulk Product Waste
PS-114	White Paint	1	Room 2 - South Wall	Concrete	1	NT	NT	NT	< 0.09	< 0.09	3.4	2.4	< 0.09	< 0.09	5.8	5.8	PCB Bulk Product Waste
PS-118	White Paint	1	Room 9 - South Wall	Concrete	1	NT	NT	NT	< 0.09	< 0.09	1.3	0.6	< 0.09	< 0.09	1.9	1.9	PCB Bulk Product Waste
PS-119	White Paint	3	East Hallway, Ceiling	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	11.1	< 0.1	< 0.1	11.1	11.1	PCB Remediation Waste
Disposal Action	1 Level					20	100	100							1		
EPA Standard															1		
RDEC															10		

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 EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.
 Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

Table 4 - Paint Analytical Results																	
Sample ID	Description	Floor	Location	Substrate	Paint Layers	Total Cadmium	Total Chromium	Total Lead	Aroclor- 1242	Aroclor- 1248	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	Total PCBs Multiplied by Number of Paint Layers	Waste Classification
PS-120	White Paint	3	East Hallway, Ceiling	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	14.5	< 0.1	< 0.1	14.5	14.5	PCB Remediation Waste
PS-121	White Paint	3	East Hallway, Ceiling	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	9.7	< 0.1	< 0.1	9.7	9.7	PCB Remediation Waste
PS-122	White Paint	4	Mezzanine Room - West Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	5.8	< 0.1	< 0.1	5.8	5.8	PCB Bulk Product Waste
PS-124	White Paint	4	Mezzanine Room - West Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	3.4	< 0.1	< 0.1	3.4	3.4	PCB Bulk Product Waste
PS-144	White Paint	1	Cable Vault - East Hallway, Upper Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	1.5	1.1	< 0.1	< 0.1	2.6	2.6	PCB Bulk Product Waste
PS-147	White Paint	1	Cable Vault - East Hallway, Upper Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	0.6	0.3	< 0.1	< 0.1	0.9	0.9	PCB Bulk Product Waste
PS-149	White Paint	1	Cable Vault - East Hallway, Mid Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	0.8	0.4	< 0.1	< 0.1	1.2	1.2	PCB Bulk Product Waste
PS-152	White Paint	1	Cable Vault - East Hallway, Mid Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	1.2	0.4	< 0.1	< 0.1	1.6	1.6	PCB Bulk Product Waste
PS-155	White Paint	1	Room 9 - Locker Room & Toilet, Upper Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	1.7	0.5	< 0.1	< 0.1	2.2	2.2	PCB Bulk Product Waste
PS-16	White Paint	1	Locker Room - Foyer, Upper Wall	Concrete	1	9.1	3,840	21,800	< 0.05	< 0.05	< 0.05	4.3	< 0.05	< 0.05	4.3	4.3	PCB Bulk Product Waste
PS-163	White Paint	2	Office 2 - South Wall, Upper Wall	Concrete	1	NT	NT	NT	< 0.09	< 0.09	1.2	< 0.09	1.2	< 0.09	2.4	2.4	PCB Bulk Product Waste
PS-167	White Paint	2	Office 3 - West Wall, Lower Wall, and Upper Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	4.4	5.8	<0.6	<0.6	10.2	10.2	PCB Bulk Product Waste
PS-171	White Paint	2	Room A: Reactor Room - North Wall, Upper Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	1.7	< 0.1	0.9	< 0.1	2.6	2.6	PCB Bulk Product Waste
PS-172	White Paint	2	Room A: Reactor Room - North Wall, Mid Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	2.9	< 0.1	1.6	< 0.1	4.5	4.5	PCB Bulk Product Waste
PS-183	White Paint	3	Room C: Lower OCB Potential Transformer Room - East Wall, Upper Wall	Brick	1	NT	NT	NT	<0.1	< 0.1	1.4	2.7	<0.1	< 0.1	4.1	4.1	PCB Remediation Waste
PS-184	White Paint	3	Room C: Lower OCB Potential Transformer Room - East Wall, Mid Wall	Brick	1	NT	NT	NT	<0.1	<0.1	0.9	1.5	<0.1	<0.1	2.4	2.4	PCB Bulk Product Waste
PS-187	White Paint	3	Room D: Lower OCB Room - North Wall, Lower Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	5.2	8.9	< 0.1	< 0.1	14.1	14.1	PCB Bulk Product Waste
PS-188	White Paint	3	Room D: Lower OCB Room - North Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	5.4	8.4	< 0.1	< 0.1	13.8	13.8	PCB Bulk Product Waste
PS-19	White Paint	2	Office 1 - Ceiling	Concrete	1	9.18	11.0	220	< 0.05	< 0.05	1.2	1.7	< 0.05	0.5	3.4	3.4	PCB Remediation Waste
PS-191	White Paint	3	Room D: Lower OCB Room - West Wall, Upper Wall	Brick	1	NT	NT	NT	< 0.09	< 0.09	1.1	2	< 0.09	< 0.09	3.1	3.1	PCB Bulk Product Waste
PS-192	White Paint	3	Room D: Lower OCB Room - West Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	1.4	2.2	< 0.1	< 0.1	3.6	3.6	PCB Bulk Product Waste
PS-196	White Paint	4	Battery Room - West Wall, Mid Wall	Metal	1	NT	NT	NT	< 0.1	< 0.1	0.4	0.6	< 0.1	1.6	2.6	2.6	PCB Remediation Waste
PS-199	White Paint	4	Room F: Main Bus Room - West Wall, North Wall, and Upper Wall	Brick	1	NT	NT	NT	<0.1	<0.1	2	2.6	<0.1	<0.1	4.6	4.6	PCB Bulk Product Waste
PS-20	White Paint	2	Office 3 - South Wall	Concrete	1	22.3	<3.64	32.3	< 0.05	< 0.05	0.3	0.3	< 0.05	0.1	0.7	0.7	PCB Bulk Product Waste
PS-208	White Paint	5	Room G: Upper Breaker Floor - West Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	0.5	1.1	< 0.1	< 0.1	1.6	1.6	PCB Bulk Product Waste
PS-222	White Paint	5	Lighting Arrestor Room - West Wall, Upper Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	1.1	< 0.1	1.2	< 0.1	2.3	2.3	PCB Bulk Product Waste
PS-235	White Paint	1	Room 5, South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	0.6	< 0.1	0.3	< 0.1	0.9	0.9	PCB Bulk Product Waste
PS-237	White Paint	1	Room 6, North Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	0.9	< 0.1	0.7	< 0.1	1.6	1.6	PCB Bulk Product Waste
PS-239	White Paint	1	Room 8, South Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	0.8	< 0.1	0.8	< 0.1	1.6	1.6	PCB Bulk Product Waste
PS-241	White Paint	2	Store Room	Concrete	1	NT	NT	NT	< 0.1	< 0.1	0.2	< 0.1	0.1	< 0.1	0.3	0.3	PCB Bulk Product Waste
PS-242	White Paint	2	Reactor Room, West Wall	Brick	1	NT	NT	NT	< 0.5	< 0.5	4.6	2.7	< 0.5	< 0.5	7.3	7.3	PCB Bulk Product Waste
PS-243	White Paint	2	Reactor Room, West Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	3.6	2.3	< 0.1	< 0.1	5.9	5.9	PCB Bulk Product Waste
PS-246	White Paint	2	Office 1	Concrete	1	NT	NT	NT	< 0.09	< 0.09	1.7	< 0.09	1.8	< 0.09	3.5	3.5	PCB Bulk Product Waste
PS-248	White Paint	2	Office 1	Concrete	1	NT	NT	NT	< 0.1	< 0.1	1.9	< 0.1	2.8	< 0.1	4.7	4.7	PCB Bulk Product Waste
PS-250	White Paint	3	Wall B	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	24.1	< 0.1	< 0.1	24.1	24.1	PCB Remediation Waste
PS-251	White Paint	3	Wall B	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	28.6	< 0.1	< 0.1	28.6	28.6	PCB Remediation Waste
PS-252	White Paint	2	Office 1 Ceiling	Concrete	1	NT	NT	NT	< 9.9	< 9.9	282	207	< 9.9	<9.9	489	489	PCB Remediation Waste
PS-254	White Paint	1	Turbine Room - Eastern portion of back southern wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	3.8	7.8	< 0.1	< 0.1	11.6	11.6	PCB Bulk Product Waste
PS-255	White Paint	1	Turbine Room - Eastern portion of back southern wall	Brick	1	NT	NT	NT	< 0.09	< 0.09	2.1	6.7	< 0.09	< 0.09	8.8	8.8	PCB Bulk Product Waste
PS-256	White Paint	1	Turbine Room - Eastern portion of back southern wall	Metal	1	NT	NT	NT	< 0.1	< 0.1	7.3	10.9	< 0.1	< 0.1	18.2	18.2	PCB Remediation Waste
Disposal Action Level						20	100	100							1		
EPA Standard															1		
RDEC							-								10		

Concentrations are presented in milligrams per kilogram (mg/kg).
 Bold indicates an exceedance of the applicable Disposal Action Level.

Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 < indicates the analyte was not detected above the specified laboratory detection limit.</li>

5. NT indicates not tested for the specific analyte.

N1 indicates not ested for the specific analyte.
 *Italics* indicates the specified laboratory detection limit exceeds the EPA action level for unrestricted future Site use.
 *PA* action level for unrestricted future Site uses is derived in 40 CFR 761.61.
 Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

	Table 4 - Paint Analytical Results																
Sample ID	Description	Floor	Location	Substrate	Paint Layers	Total Cadmium	Total Chromium	Total Lead	Aroclor- 1242	Aroclor- 1248	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	Total PCBs Multiplied by Number of Paint Layers	Waste Classification
PS-257	White Paint	2	Office 1 Ceiling	Concrete	1	NT	NT	NT	11.8	< 0.1	< 0.1	< 0.1	3.2	< 0.1	15	15	PCB Remediation Waste
PS-258	White Paint	2	Office 1 Ceiling	Concrete	1	NT	NT	NT	0.8	< 0.1	< 0.1	6.8	< 0.1	< 0.1	7.6	7.6	PCB Remediation Waste
PS-259	White Paint	2	Office 1 Ceiling	Concrete	1	NT	NT	NT	0.3	< 0.1	< 0.1	< 0.1	1.8	< 0.1	2.1	2.1	PCB Remediation Waste
PS-260	White Paint	2/3	Stairwell Into 3rd floor	Concrete	1	12.2	277	1,350	< 0.1	0.9	< 0.1	< 0.1	2.5	< 0.1	3.4	3.4	PCB Bulk Product Waste
PS-30	White Paint	2	Room A: Reactor Room - East Wall Behind Air Ducts	Brick	1	7.6	57.2	615	<2.2	<2.2	3.2	<2.2	<2.2	<2.2	3.2	3.2	PCB Bulk Product Waste
PS-41	White Paint	4	Room E: Potential Transformer Upper - West Wall	Brick	1	17.2	413	2,340	< 0.05	< 0.05	< 0.05	8.3	< 0.05	< 0.05	8.3	8.3	PCB Bulk Product Waste
PS-44	White Paint	5	Mezzanine - South Wall	Brick	1	67.5	4,750	39,500	< 0.05	< 0.05	< 0.05	6.5	< 0.05	< 0.05	6.5	6.5	PCB Bulk Product Waste
PS-63	White Paint	3	East Hallway - West Wall	Concrete	1	NT	NT	NT	<2.7	<2.7	<2.7	33.3	<2.7	<2.7	33.3	33.3	PCB Remediation Waste
PS-74	White Paint	3	East Hallway, West Wall	Tan Brick	1	NT	NT	NT	< 0.3	< 0.3	< 0.3	29.9	< 0.3	< 0.3	29.9	29.9	PCB Remediation Waste
PS-77	White Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.5	< 0.5	< 0.5	29.7	< 0.5	< 0.5	<b>29.</b> 7	29.7	PCB Remediation Waste
PS-78	White Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.5	< 0.5	< 0.5	29.5	< 0.5	< 0.5	29.5	29.5	PCB Remediation Waste
PS-81	White Paint	3	East Hallway, West Wall	Tan Brick	1	NT	NT	NT	< 0.3	< 0.3	< 0.3	52.7	< 0.3	< 0.3	52.7	52.7	PCB Bulk Product Waste
PS-82	White Paint	3	East Hallway, West Wall	Tan Brick	1	NT	NT	NT	< 0.5	< 0.5	< 0.5	67.3	< 0.5	< 0.5	67.3	67.3	PCB Bulk Product Waste
PS-83	White Paint	3	East Hallway, East Wall	Steel	1	NT	NT	NT	< 0.09	< 0.09	< 0.09	20.7	< 0.09	< 0.09	20.7	20.7	PCB Bulk Product Waste
PS-84	White Paint	3	East Hallway, East Wall	Steel	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	25.7	< 0.1	< 0.1	25.7	25.7	PCB Bulk Product Waste
PS-87	White Paint	3	East Hallway, West Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	27.5	< 0.1	< 0.1	27.5	27.5	PCB Bulk Product Waste
PS-91	White Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.4	< 0.4	< 0.4	12.3	< 0.4	< 0.4	12.3	12.3	PCB Bulk Product Waste
PS-92	White Paint	3	East Hallway, East Wall	Concrete	1	NT	NT	NT	< 0.4	< 0.4	< 0.4	9.8	< 0.4	< 0.4	9.8	9.8	PCB Bulk Product Waste
PS-131	White Paint	3	Ceiling - South End of East Hallway	Concrete	1	NT	NT	NT	< 0.5	< 0.5	6.8	10.9	< 0.1	< 0.1	17.7	17.7	PCB Bulk Product Waste
PS-132	White Paint	3	Room D - Upper Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	0.4	0.6	< 0.1	< 0.1	1.0	1	PCB Bulk Product Waste
PS-134	White Paint	2	Room B - Battery Box	Steel	1	NT	NT	NT	< 0.1	< 0.1	2.7	3.4	< 0.1	< 0.1	6.1	6.1	PCB Bulk Product Waste
PS-136	White Paint	5	Mezzanine - Upper Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	2.2	3.4	< 0.1	< 0.1	5.6	5.6	PCB Bulk Product Waste
PS-142	White Paint	1	Cable Vault - East Hallway, Upper Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	1.3	1	< 0.1	< 0.1	2.3	2.3	PCB Bulk Product Waste
PS-195	White Paint	4	Battery Room - West Wall, Lower Wall	Metal	1	NT	NT	NT	< 0.1	< 0.1	0.3	0.3	< 0.1	0.3	0.9	0.9	PCB Remediation Waste
PS-200	White Paint	4	Room F: Main Bus Room - West Wall, North Wall, and Mid Wall	Brick	1	NT	NT	NT	<0.09	< 0.09	2.5	3.5	<0.1	<0.1	6.0	6	PCB Bulk Product Waste
PS-207	White Paint	5	Room G: Upper Breaker Floor - West Wall, Upper Wall	Brick	1	NT	NT	NT	<0.09	<0.09	0.4	0.9	< 0.09	<0.09	1.3	1.3	PCB Bulk Product Waste
PS-211	White Paint	5	Room G: Upper Breaker Floor - West Wall, Upper Wall	Brick	1	NT	NT	NT	<0.09	<0.09	0.4	0.9	<0.09	<0.09	1.3	1.3	PCB Bulk Product Waste
PS-212	White Paint	5	Room G: Upper Breaker Floor - West Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.09	< 0.09	0.7	1.3	< 0.09	< 0.09	2.0	2	PCB Bulk Product Waste
PS-217	White Paint	5	Lighting Arrestor Room - North Wall, Mid Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	0.2	0.2	< 0.1	< 0.1	0.4	0.4	PCB Bulk Product Waste
PS-218	White Paint	5	Lighting Arrestor Room - North Wall, Upper Wall	Concrete	1	NT	NT	NT	< 0.1	< 0.1	< 0.1	0.2	< 0.1	< 0.1	0.2	0.2	PCB Bulk Product Waste
PS-221	White Paint	5	Lighting Arrestor Room - West Wall, Mid Wall	Brick	1	NT	NT	NT	< 0.1	< 0.1	0.9	1	< 0.1	< 0.1	1.9	1.9	PCB Bulk Product Waste
PS-101	White Paint Underlain by Black Paint	3	East Hallway, West Wall	Brick	2	NT	NT	NT	< 0.1	< 0.1	< 0.1	35.2	< 0.1	< 0.1	35.2	70.4	PCB Bulk Product Waste
PS-102	White Paint Underlain by Black Paint	3	East Hallway, West Wall	Brick	2	NT	NT	NT	< 0.1	< 0.1	< 0.1	39.2	< 0.1	< 0.1	39.2	78.4	PCB Bulk Product Waste
PS-38	White Paint Underlain by Black Paint	3	Room C: Lower OCB Potential Transformer Room - Concrete Step	Concrete	2	11.9	2,530	9,880	<1.4	<1.4	<1.4	5.4	<1.4	<1.4	5.4	10.8	PCB Remediation Waste
PS-08	White Paint Underlain By Dark Green Paint	1	Cable Vault - West Hallway, Wall	Concrete	2	11.9	8,820	50,300	< 0.05	< 0.05	2.4	1.4	< 0.05	0.3	4.1	8.2	PCB Bulk Product Waste
PS-156	White Paint Underlain by Dark Green Paint	1	Room 9 - Locker Room & Toilet, Mid Wall	Concrete	2	NT	NT	NT	< 0.1	< 0.1	1.4	0.4	< 0.1	< 0.1	1.8	3.6	PCB Bulk Product Waste
PS-160	White Paint Underlain by Dark Green Paint	1	Locker Room - Foyer, Mid Wall	Concrete	2	NT	NT	NT	< 0.1	< 0.1	2.9	8.1	< 0.1	< 0.1	11.0	22	PCB Bulk Product Waste
PS-179	White Paint Underlain by Dark Green Paint	2	Room B: Main Switchboard Room - West Wall, Mid Wall	Brick	2	NT	NT	NT	< 0.1	< 0.1	2.5	8.1	<0.1	1.9	12.5	25	PCB Bulk Product Waste
Disposal Action	1 Level					20	100	100							1		
EPA Standard															1		
RDEC															10		
Notes:																	

Concentrations are presented in milligrams per kilogram (mg/kg).
 Bold indicates an exceedance of the applicable Disposal Action Level.
 Red indicates an exceedance of the applicable Method 1 RDEC Objective.
 - indicates the analyte was not detected above the specified laboratory detection limit.

4. < Indicates the analyte was not detected above the specific abovatory detection inmit.</li>
5. NT indicates not tested for the specific analyte.
6. *Italics* indicates the specified laboratory detection limit exceeds the EPA action level for unrestricted future Site use.
7. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.
8. Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

					Table	4 - Paint Ai	nalytical Res	ılts									
Sample ID	Description	Floor	Location	Substrate	Paint Layers	Total Cadmium	Total Chromium	Total Lead	Aroclor- 1242	Aroclor- 1248	Aroclor- 1254	Aroclor- 1260	Aroclor- 1262	Aroclor- 1268	Total PCBs	Total PCBs Multiplied by Number of Paint Layers	Waste Classification
PS-180	White Paint Underlain by Dark Green Paint	2	Room B: Main Switchboard Room - West Wall, Upper Wall	Brick	2	NT	NT	NT	<0.1	< 0.1	2.4	< 0.1	5.4	<0.1	7.8	15.6	PCB Bulk Product Waste
PS-32	White Paint Underlain by Dark Green Paint	2	Room B: Main Switchboard Room - North Wall	Concrete	2	133	2,330	30,900	< 0.05	< 0.05	1.2	3.0	< 0.05	0.9	5.1	10.2	PCB Bulk Product Waste
PS-62	White Paint Underlain by Dark Green Paint	Exterior	Northern Exterior - Wall	Brick	2	NT	NT	NT	< 0.05	< 0.05	2.0	2.0	< 0.05	< 0.05	4.0	8	PCB Bulk Product Waste
PS-88	White Paint Underlain by Dark Green Paint	3	East Hallway, West Wall	Brick	2	NT	NT	NT	< 0.2	< 0.2	< 0.2	29.1	< 0.2	< 0.2	29.1	58.2	PCB Bulk Product Waste
PS-95	White Paint Underlain by Dark Green Paint	3	East Hallway, South Wall	Brick	2	NT	NT	NT	< 0.1	< 0.1	< 0.1	8.3	< 0.1	0.9	9.2	18.4	PCB Bulk Product Waste
PS-59	White Paint Underlain by Gray Paint	Exterior	Northern Exterior - Garage Door	Metal	2	NT	NT	NT	< 0.2	< 0.2	0.9	0.7	< 0.2	< 0.2	1.6	3.2	PCB Remediation Waste
PS-168	White Paint Underlain by Green Paint underlain by Dark Green Paint	2	Office 3 - West Wall, Mid Wall	Brick	3	NT	NT	NT	<0.1	< 0.1	3.2	< 0.1	6.5	<0.1	9.7	29.1	PCB Bulk Product Waste
PS-52	White Paint Underlain by Light Green Paint	3	East Hallway - East Wall	Concrete	2	NT	NT	NT	<2.5	<2.5	<2.5	49.8	<2.5	<2.5	49.8	99.6	PCB Remediation Waste
PS-53	White Paint Underlain by Light Green Paint	3	East Hallway - East Wall	Metal	2	NT	NT	NT	<1.0	<1.0	<1.0	23.0	<1.0	<1.0	23.0	46	PCB Bulk Product Waste
PS-61	White Paint Underlain by Light Green Paint	Exterior	Western Exterior - Door	Metal	2	NT	NT	NT	< 0.3	< 0.3	< 0.3	0.4	< 0.3	< 0.3	0.4	0.8	PCB Remediation Waste
PS-164	White Paint Underlain by Light Green Paint Underlain by Dark Green Paint	2	Office 2 - South Wall, Mid Wall	Concrete	3	NT	NT	NT	<0.1	< 0.1	4.5	< 0.1	4.7	<0.1	9.2	27.6	PCB Bulk Product Waste
PS-205	White Paint Underlain by Yellow Paint	4	Room E: Potential Transformer Upper - West Wall, Mid Wall	Brick	2	NT	NT	NT	<0.1	< 0.1	1.2	0.7	<0.1	<0.1	1.1	2.2	PCB Bulk Product Waste
PS-206	White Paint Underlain by Yellow Paint	4	Room E: Potential Transformer Upper - West Wall, Upper Wall	Brick	2	NT	NT	NT	<0.1	<0.1	0.9	0.3	<0.1	<0.1	1.2	2.4	PCB Bulk Product Waste
PS-60	White Underlain by Light Green Underlain by Tan	Exterior	Northern Exterior - Window Cover	Metal	3	NT	NT	NT	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	PCB Remediation Waste
PS-159	White Underlain by Yellow Paint	1	Locker Room - Foyer, Upper Wall	Concrete	2	NT	NT	NT	< 0.1	< 0.1	3.6	8	< 0.1	< 0.1	11.6	23.2	PCB Bulk Product Waste
PS-31	Yellow Paint	2	Room B: Main Switchboard Room - Battery Box	Wood	1	<2.3	27.2	69.6	<1.1	<1.1	2.9	2.4	<1.1	<1.1	5.3	5.3	PCB Remediation Waste
PS-26	Yellow Paint Underlain by Gray and Light Green Paint	2	Room A: Reactor Room - Concrete Shelf	Concrete	3	9.84	9,060	44,600	<0.3	< 0.3	3.5	4.3	<0.3	1.4	9.2	27.6	PCB Bulk Product Waste
PS-06	Yellow Paint Underlain by Red and Green Paint	1	Cable Vault - Fire Extinguisher Marking	Brick	3	51.8	11,200	47,300	< 0.05	< 0.05	3.3	1.4	< 0.05	< 0.05	4.7	14.1	PCB Bulk Product Waste
PS-150	Yellow Paint Underlain by Red and Green Paint	1	Cable Vault - Fire Extinguisher Marking	Brick	2	NT	NT	NT	<0.1	< 0.1	10.7	3	<0.1	<0.1	13.7	27.4	PCB Bulk Product Waste
Disposal Action	n Level					20	100	100							1		
EPA Standard															1		
RDEC															10		
Notes: 1. Concentrations a	are presented in milligrams per kilogram (mg/kg).																

Concentrations are presented in milligrams per kilogram (mg/kg).
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 <a href="cito:</a> 

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 *Italics* indicates the specified laboratory detection limit exceeds the EPA action level for unrestricted future Site use.

 EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

 Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

	Table 5 - Bulk Material Analytical Results														
Sample ID	Location	Floor	Description	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclor- 1242	Aroclor- 1248	Aroclor- 1254	Aroclor- 1260	Araclor-1262	Aroclor- 1268	Total PCBs	Asbestos Content	Waste Classification
012	Roof	Roof	Grey Caulk	10/30/2018	11/6/2018	79	< 0.2	<0.2	<0.2	< 0.2	< 0.2	< 0.2	<0.2	Negative	PCB Bulk Product Waste
013	Roof	Roof	Black Caulk	10/30/2018	11/6/2018	79	< 0.8	<0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	Negative	PCB Bulk Product Waste
014	Roof	Roof	Roofing Material	10/30/2018	11/6/2018	24	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	Negative	PCB Bulk Product Waste
016	Roof	Roof	Tar Paper	10/30/2018	11/6/2018	129	<1.1	<1.1	<1.1	<1.1	<1.1	1.2	1.2	Negative	PCB Bulk Product Waste
019	Roof	Roof	Silver Roof Coating	10/30/2018	11/6/2018	59	<1.2	<1.2	<1.2	<1.2	<1.2	<1.2	<1.2	Negative	PCB Bulk Product Waste
022	Northern Exterior - East Doorway	Exterior	White Caulk*	10/30/2018	11/6/2018	66	< 0.5	< 0.5	1.2	< 0.5	< 0.5	< 0.5	1.2	Assumed Positive	ACM and PCB Remediation Waste
022A	Northern Exterior - East Doorway	Exterior	White Caulk*	9/1/2021	9/7/2021	63	< 0.2	<0.2	1.0	< 0.2	0.5	< 0.2	1.5	Assumed Positive	ACM and PCB Remediation Waste
022B	Northern Exterior - East Doorway	Exterior	White Caulk*	9/1/2021	9/7/2021	43	< 0.2	<0.2	0.7	< 0.2	0.4	< 0.2	0.9	Assumed Positive	ACM and PCB Remediation Waste
023	Northern Exterior - East Doorway	Exterior	Window Glazing	10/30/2018	11/6/2018	56	< 0.2	< 0.2	<0.2	< 0.2	< 0.2	< 0.2	<0.2	2% Chrysotile	ACM and PCB Bulk Product Waste
024	Northern Exterior - West Doorway	Exterior	White Caulk	10/30/2018	11/6/2018	20	< 0.2	<0.2	<0.2	< 0.2	< 0.2	< 0.2	<0.2	3% Chrysotile	ACM and PCB Remediation Waste
028	Northern Exterior - Expansion Joint	Exterior	White Caulk	10/30/2018	11/6/2018	49	< 0.2	< 0.2	1.3	0.9	< 0.2	< 0.2	2.2	Trace (< 1% Chrysolite)	ACM and PCB Remediation Waste
028A	Northern Exterior - Expansion Joint	Exterior	White Caulk	9/1/2021	9/7/2021	88	<0.2	<0.2	0.5	<0.2	<0.2	<0.2	0.5	Assumed Positive	ACM and PCB Remediation Waste
028B	Northern Exterior - Expansion Joint	Exterior	White Caulk	9/1/2021	9/7/2021	84	< 0.2	< 0.2	0.6	< 0.2	< 0.2	< 0.2	0.6	Assumed Positive	ACM and PCB Remediation Waste
029	Southern Exterior - Expansion Joint	Exterior	Black Caulk	10/30/2018	11/6/2018	67	< 0.2	< 0.2	0.3	< 0.2	< 0.2	< 0.2	0.3	8% Chrysotile	ACM and PCB Remediation Waste
1009	Cable Vault	1	Grey Caulk*	10/1/2018	10/10/2018	59	0.4	0.4	1.9	< 0.2	< 0.2	< 0.2	2.3	8% Chrysotile	ACM and PCB Remediation Waste
1009A	Cable Vault	1	Grey Caulk*	9/1/2021	9/7/2021	87	< 0.2	< 0.2	3.7	< 0.2	0.4	< 0.2	4.1	Assumed Positive	ACM and PCB Remediation Waste
1010	Cable Vault	1	Pothead Gasket	10/1/2018	10/10/2018	83	<3.1	<3.1	13.9	<3.1	<3.1	<3.1	13.9	Negative	PCB Remediation Waste
1010A	Cable Vault	1	Pothead Gasket	9/1/2021	9/7/2021	96	< 0.8	< 0.8	10	2.6	< 0.8	< 0.8	12.6	NT	PCB Remediation Waste
1010B	Cable Vault	1	Pothead Gasket	9/1/2021	9/7/2021	85	<0.6	<0.6	11.1	3	<0.6	<0.6	14.1	NT	PCB Remediation Waste
1013	Cable Vault	1	Conduit Putty	10/1/2018	10/10/2018	73	< 0.3	< 0.3	2.2	< 0.3	< 0.3	< 0.3	2.2	10% Chrysotile	ACM and PCB Remediation Waste
1013A	Cable Vault	1	Conduit Putty	9/1/2021	9/7/2021	71	< 0.2	< 0.2	1.3	< 0.2	< 0.2	< 0.2	1.3	Assumed Positive	ACM and PCB Remediation Waste
1024	Locker Room	1	Conduit Putty	10/1/2018	10/10/2018	46	< 0.2	< 0.2	5.9	< 0.2	< 0.2	< 0.2	5.9	12% Chrysotile	ACM and PCB Remediation Waste
1024A	Locker Room	1	Conduit Putty	9/1/2021	9/7/2021	52	< 0.2	< 0.2	26.8	< 0.2	< 0.2	< 0.2	26.8	Assumed Positive	ACM and PCB Remediation Waste
1026	Turbine Room	1	Stair Tread	10/1/2018	10/10/2018	104	< 0.1	< 0.1	<0.1	5.1	< 0.1	< 0.1	5.1	3% Chrysotile	ACM and PCB Remediation Waste
1026A	Turbine Room	1	Stair Tread	9/1/2021	9/13/2021	64	< 0.2	< 0.2	2.1	5.2	< 0.2	< 0.2	7.3	Assumed Positive	ACM and PCB Remediation Waste
1026B	Turbine Room	1	Stair Tread	9/1/2021	9/11/2021	65	< 0.3	< 0.3	2.9	6.9	< 0.3	< 0.3	9.8	Assumed Positive	ACM and PCB Remediation Waste
2001	Office 1	2	Table Covering	10/1/2018	10/11/2018	463	< 0.1	< 0.1	14.4	5.5	< 0.1	< 0.1	19.9	Negative	PCB Remediation Waste
2003A	Office 1	2	Rubber Floor Mat (Type 1)	10/1/2018	10/12/2018	SD	<1.9	<1.9	<1.9	42.3	<1.9	<1.9	42.3	Negative	PCB Remediation Waste
2003B	Office 1	2	Rubber Floor Mat (Type 1)	10/1/2018	10/17/2018	71	3.0	< 0.2	9.4	18.9	< 0.2	< 0.2	31.3	Negative	PCB Remediation Waste
2003C	Office 1	2	Rubber Floor Mat (Type 1)	10/30/2018	11/7/2018	67	< 0.1	< 0.1	6.1	10.3	< 0.1	< 0.1	16.4	Negative	PCB Remediation Waste
2004	Bathroom	2	Cove Base Molding	10/1/2018	10/11/2018	45	< 0.1	< 0.1	1.1	< 0.1	< 0.1	< 0.1	1.1	Negative	PCB Bulk Product Waste
2004A	Bathroom	2	Cove Base Molding	9/1/2021	9/11/2021	65	< 0.3	< 0.3	3.3	0.6	< 0.3	< 0.3	3.9	NT	PCB Bulk Product Waste
2004B	Bathroom	2	Cove Base Molding	9/1/2021	9/11/2021	55	2.0	< 0.2	2.2	0.8	< 0.2	< 0.2	5.0	NT	PCB Bulk Product Waste
2011	Office 2	2	Window Glazing*	10/1/2018	10/11/2018	76	< 0.2	< 0.2	1.0	1.2	< 0.2	0.3	2.5	Assumed Positive	ACM and PCB Bulk Product Waste
2011A	Office 2	2	Window Glazing*	9/1/2021	9/7/2021	71	< 0.2	< 0.2	0.8	< 0.2	0.4	< 0.2	1.2	Assumed Positive	ACM and PCB Bulk Product Waste
2011B	Office 2	2	Window Glazing*	9/1/2021	9/7/2021	103	< 0.2	< 0.2	1.9	< 0.2	1.1	< 0.2	3	Assumed Positive	ACM and PCB Bulk Product Waste
2012	Office 2	2	Rubber Floor Mat (Type 2)	10/1/2018	10/12/2018	31	< 0.1	< 0.1	0.8	0.7	< 0.1	< 0.1	1.5	Negative	PCB Remediation Waste
2012B	Office 2	2	Rubber Floor Mat (Type 2)	10/30/2018	11/7/2018	60	0.7	<0.1	1.1	0.9	<0.1	0.2	2.9	Negative	PCB Remediation Waste
2014	Office 3	2	Rubber Floor Mat (Type 2)	10/1/2018	10/11/2018	52	0.9	<0.1	1.3	1.2	<0.1	< 0.1	3.4	Negative	PCB Remediation Waste
Disposal Ac	tion Level					-		-			-	-	1	Asbestos Present	
EPA Standa	rd												1		
RDEC													10		

Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
 Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.
 PCB analytical results are reported in milligrams per kilogram (mg/kg).
 < denotes analyte was not detected above the laboratory detection limit.</li>
 Bold indicates an exceedance of the applicable Disposal Action Level.
 NT indicates sample was not tested based on negative reults from same homogenous area or sample not suspected to contain asbestos.
 * a modul denotes registing a material on use representation of the actent facility baffers laboratory ubmittal.

6. * symbol denotes paint was observed on the material and was removed to the extent feasible before laboratory submittal.
 7. Red indicates an exceedance of the applicable Method 1 RDEC Objective

SD indicates surrogate recovery percentage diluted below laboratory quantification limit.
 Disposal Action Level obtained from National Grid EP No. 17.

Disposal Action level of unrestricted future Site uses is derived in 40 CFR 761.61.
 Method 1 Residential Direct Exposure Criteria (RDEC) Objective obtained from Section 1.9.2 of the Remediation Regulations derived in Section 3.1.

	Table 5 - Bulk Material Analytical Results														
Sample ID	Location	Floor	Description	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclor- 1242	Aroclor- 1248	Aroclor- 1254	Aroclor- 1260	Araclor-1262	Aroclor- 1268	Total PCBs	Asbestos Content	Waste Classification
2015	Room B: Main Switchboard Room	2	Table Covering	10/1/2018	10/11/2018	57	< 0.1	<0.1	3.5	2.9	< 0.1	< 0.1	6.4	Negative	PCB Remediation Waste
2016	Room B: Main Switchboard Room	2	Rubber Floor Mat (Type 3)	10/1/2018	10/11/2018	77	< 0.1	< 0.1	6.1	7.1	< 0.1	< 0.1	13.2	Negative	PCB Remediation Waste
2016B	Room B: Main Switchboard Room	2	Rubber Floor Mat (Type 3)	10/30/2018	11/6/2018	54	0.9	< 0.1	3.6	3.1	< 0.1	< 0.1	7.6	Negative	PCB Remediation Waste
2016C	Room B: Main Switchboard Room	2	Rubber Floor Mat (Type 3)	10/30/2018	11/7/2018	66	7.8	<0.1	8.4	5.6	< 0.1	1.0	22.8	Negative	PCB Remediation Waste
2018	Room B: Main Switchboard Room: Office	2	Cove Base Molding	10/1/2018	10/11/2018	81	2.3	< 0.1	3.7	1.6	< 0.1	< 0.1	7.6	Negative	PCB Bulk Product Waste
2018A	Room B: Main Switchboard Room: Office	2	Cove Base Molding	9/1/2021	9/7/2021	58	4.2	< 0.2	< 0.2	< 0.2	1.9	< 0.2	6.1	NT	PCB Bulk Product Waste
2018B	Room B: Main Switchboard Room: Office	2	Cove Base Molding	9/1/2021	9/7/2021	77	< 0.2	< 0.2	5.5	< 0.2	1.7	< 0.2	7.2	NT	PCB Bulk Product Waste
2035	Room B: Main Switchboard Room	2	Window Glazing	10/2/2018	10/11/2018	49	1.0	< 0.2	5.7	3.1	< 0.2	0.7	10.5	Assumed Positive	ACM and PCB Bulk Product Waste
2035B	Room B: Main Switchboard Room	2	Window Glazing	9/1/2021	9/11/2021	62	< 0.2	< 0.2	3.8	< 0.2	5.5	< 0.2	9.3	<b>Assumed Positive</b>	ACM and PCB Bulk Product Waste
2037	Bathroom	2	Floor Tile	12/28/2022	1/10/2023	64	< 0.05	0.7	< 0.05	2.2	< 0.05	< 0.05	2.9	2% Chrysotile	ACM and PCB Remediation Waste
2038	Room B: Main Switchboard Room: Office	2	Floor Tile	12/28/2022	1/10/2023	58	< 0.05	1.6	< 0.05	2.4	< 0.05	< 0.05	4.0	2% Chrysotile	ACM and PCB Remediation Waste
2040	Switchboard Office	2	Acoustic Tile	1/27/2023	1/30/2023	88	< 0.1	0.6	<0.1	0.6	< 0.1	< 0.1	1.2	Negative	PCB Bulk Product Waste
2041	Switchboard Office	2	Acoustic Tile	1/27/2023	1/30/2023	82	< 0.1	0.6	< 0.1	0.4	< 0.1	< 0.1	1.0	Negative	PCB Bulk Product Waste
2042	Switchboard Office	2	Plywood	1/27/2023	1/30/2023	61	< 0.1	0.4	< 0.1	0.4	< 0.1	< 0.1	0.8	NT	Not regulated
2043	Switchboard Office	2	Plywood	1/27/2023	1/30/2023	58	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	< 0.09	NT	Not regulated
3015	Third Floor Hallway	3	Window Glazing*	10/2/2018	10/11/2018	66	< 0.3	< 0.3	<0.3	9.0	< 0.3	< 0.3	9.0	Assumed Positive	ACM and PCB Bulk Product Waste
4006	Battery Room	4	Window Glazing*	10/3/2018	10/11/2018	70	<1.8	<1.8	5.6	3.7	<1.8	<1.8	9.3	Assumed Positive	ACM and PCB Bulk Product Waste
5001	Fifth Floor - Mezzanine	5	Window Glazing*	10/3/2018	10/11/2018	74	< 0.2	< 0.2	1.5	0.9	< 0.2	< 0.2	2.4	Assumed Positive	ACM and PCB Bulk Product Waste
5009	Fifth Floor - Air Handler	5	Door Strip	10/31/2018	11/7/2018	129	< 0.3	< 0.3	< 0.3	0.7	< 0.3	0.7	1.4	Negative	PCB Bulk Product Waste
5009A	Fifth Floor - Air Handler	5	Door Strip	9/1/2021	9/7/2021	971	< 0.3	< 0.3	< 0.3	9.8	< 0.3	6.0	15.8	NT	PCB Bulk Product Waste
5009B	Fifth Floor - Air Handler	5	Door Strip	9/1/2021	9/7/2021	325	< 0.4	<0.4	<0.4	2.3	<0.4	2.4	4.7	NT	PCB Bulk Product Waste
5010	Fifth Floor - Air Handler	5	Silver Coating	10/31/2018	11/6/2018	86	<7.1	<7.1	<7.1	11.8	<7.1	<7.1	11.8	Negative	PCB Bulk Product Waste
5010A	Fifth Floor - Air Handler	5	Silver Coating	9/1/2021	9/11/2021	74	< 0.7	< 0.7	4.0	< 0.7	3.9	< 0.7	7.9	NT	PCB Bulk Product Waste
5010B	Fifth Floor - Air Handler	5	Silver Coating	9/1/2021	9/11/2021	76	< 0.7	< 0.7	4.1	< 0.7	2.9	< 0.7	7.0	NT	PCB Bulk Product Waste
Disposal	Action Level												1	Asbestos Present	
EPA Star	ndard												1		
RDEC													10		
Notes: 1. Surrogate 2. PCB ana 3. < denote: 4. <b>Bold</b> ind: 5. NT indic 6. * symbol	lotes: . Surcogate data is based on recovery percentage of an added concentration of decachlorobiphenyl. . PCB analytical results are reported in milligrams per kilogram (mg/kg). . < cleanest analyte was not detected above the laboratory detection limit. . Bold indicates an exceedance of the applicable Disposal Action Level. . NT indicates sample was not tested based on negative reults from same homogenous area or sample not susepcted to contain asbestos. * symbol denotes paint was observed on the material and was removed to the extent feasible before laboratory submittal.														

7. Red indicates an exceedance of the applicable Method 1 RDEC Objective

SD indicates surrogate recovery errentage diluted below laboratory quantification limit.
 Disposal Action Level obtained from National Grid EP No. 17.

10. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

Table 6 - Wipe Sample Analytical Results											
Sample ID	Location	Wipe Surface	Sample Date	Analysis Date	Surrogate Recovery Percentage	Total PCBs					
WS-01-01	Turbine Room	Black Painted Staircase	1/3/2020	1/11/2020	94	< 0.5					
WS-01-02	Hallway into Turbine Room	Light Green Paint on Concrete	10/21/2021	10/27/2021	90	<1.0					
WS-01-03	Cable Vault	Interior of Air Handler	10/21/2021	10/27/2021	92	<1.0					
WS-02-01	Switchboard Room	Unpainted Steel Conduit	9/26/2019	9/26/2019	78	<0.5					
WS-02-02	Switchboard Room	Brown Painted Office Enclosure	1/3/2020	1/11/2020	100	5.8					
WS-02-03	Switchboard Room	White Paint on Battery Box	5/29/2020	6/9/2020	110	<1.0					
WS-02-04	Switchboard Room	Light Green Paint on Battery Box	5/29/2020	6/9/2020	108	<1.0					
WS-02-05	Reactor Room	Light Green Paint on Brick Wall	10/21/2021	10/27/2021	94	<1.0					
WS-02-06	Switchboard Room	White Paint on Metal Panel	10/21/2021	10/27/2021	92	<1.0					
WS-03-01	Third Floor Hallway	Unpainted Steel Conduit	9/26/2019	9/26/2019	84	<0.5					
WS-03-02	Third Floor Hallway	Unpainted Steel Conduit	9/26/2019	9/26/2019	80	< 0.5					
WS-03-03	Room D: Lower OCB Room	White Painted Wall	5/29/2020	6/9/2020	107	<1.0					
WS-03-04	Room D: Lower OCB Room	Dark Green Painted Wall	5/29/2020	6/9/2020	109	<1.0					
WS-03-05	Behind Door to Room C	Light Green Paint on Brick Wall, Behind Duct	10/21/2021	10/27/2021	97	<1.0					
WS-03-06	Stariwell to Room D	Light Green Paint on Brick Wall	10/21/2021	10/27/2021	95	<1.0					
WS-04-01	Fourth Floor Mezzanine	Unpainted Transite Enclosure	1/3/2020	1/11/2020	103	1.4					
WS-04-02	Fourth Floor Mezzanine Stairwell	White Paint on Brick	10/21/2021	10/27/2021	94	<1.0					
WS-04-03	Potential Transformer Upper	Black Paint on Brick	10/21/2021	10/27/2021	92	<1.0					
WS-04-04	Main Bus Room	Dark Green Paint on Wall, Behind Duct	10/21/2021	10/27/2021	93	<1.0					
WS-05-01	Fifth Floor Mezzanine	Light Green Painted Wall	5/29/2020	6/9/2020	104	<1.0					
WS-05-02	Fifth Floor Mezzanine	White Painted Wall	5/29/2020	6/9/2020	107	<1.0					
WS-05-03	Lightning Arrestor Room	Interior of Air Handler	10/21/2021	10/27/2021	95	<1.0					
WS-05-04	Lightning Arrestor Room	Interior of Air Handler	10/21/2021	10/27/2021	89	<1.0					
WS-05-05	Upper Breaker Room	Dark Green Paint on Brick Wall, Behind Duct	10/21/2021	10/27/2021	82	<1.0					
EPA Decontar	PA Decontamination Standard 10										

1. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.

Analytical results are reported in μg/100 cm².
 Analytical results are reported in μg/100 cm².
 < denotes analyte was not detected above the laboratory detection limit.</li>
 Total PCBs are reported as concrentaritons of Aroclor 1260; no other aroclors were detected.
 EPA Decontamination Standard is derived in 40 CFR 761.79(b)(3)(i)(a).

Table 7 - Turbine Room Infill Material Analytical Results											
Sample ID	Description	Sample Date	Analysis Date	Surrogate Recovery Percentage	Aroclor-1248	Aroclor-1254	Aroclor-1260	Total PCBs			
SS-01	Trap Rock	1/27/2023	1/30/2023	76	< 0.04	< 0.04	< 0.04	< 0.04			
SS-02	Trap Rock	1/27/2023	1/30/2023	79	< 0.04	< 0.04	< 0.04	< 0.04			
SS-03	Trap Rock	1/27/2023	1/30/2023	88	< 0.04	< 0.04	< 0.04	< 0.04			
SS-04	Trap Rock	1/27/2023	1/30/2023	85	< 0.04	0.06	0.06	0.12			
SS-05	Trap Rock	1/27/2023	1/30/2023	92	< 0.04	< 0.04	< 0.04	< 0.04			
SS-06	Soil	1/27/2023	1/30/2023	83	< 0.05	< 0.05	< 0.05	< 0.05			
SS-07	Soil	1/27/2023	1/30/2023	67	0.06	< 0.06	0.07	0.13			
SS-08	Soil	1/27/2023	1/30/2023	70	< 0.05	< 0.05	0.2	0.2			
SS-09	Soil	1/27/2023	1/30/2023	67	< 0.05	< 0.05	0.08	0.08			
SS-10	Soil	1/27/2023	1/30/2023	67	< 0.05	< 0.05	0.4	0.4			
EPA Standard								1			
RDEC								10			
Notes:											

1. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.

2. Analytical results are reported in milligrams per kilogram (mg/kg).

3. < denotes analyte was not detected above the laboratory detection limit.

4. EPA action level for unrestricted future Site uses is derived in 40 CFR 761.61.

Table 8 - Quality Assurance and Quality Control Results										
Sample Type	Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Total PCBs					
Concrete Floor Characterization	ICS-01-16	10/1/2018	10/10/2018	46	< 0.1					
Collocated Duplicate	DUP-01	10/1/2018	10/10/2018	57	< 0.1					
Concrete Floor Characterization	ICS-01-36	10/1/2018	10/9/2018	69	< 0.09					
Collocated Duplicate	DUP-02	10/1/2018	10/10/2018	75	< 0.1					
Concrete Floor Characterization	ICS-04-14	10/3/2018	10/15/2018	90	< 0.1					
Collocated Duplicate	DUP-03	10/3/2018	10/10/2018	70	< 0.1					
Concrete Floor Characterization	ICS-01-28	10/1/2018	10/9/2018	50	0.2					
Collocated Duplicate	DUP-04	10/1/2018	10/10/2018	57	0.3					
Concrete Floor Characterization	ICS-02-02	10/2/2018	10/11/2018	69	< 0.1					
Collocated Duplicate	DUP-05	10/2/2018	10/10/2018	41	0.5					
Concrete Floor Characterization	ICS-03-09	10/2/2018	10/12/2018	85	0.2					
Collocated Duplicate	DUP-06	10/2/2018	10/10/2018	76	0.3					
Concrete Floor Characterization	ICS-01-52	10/31/2018	11/6/2018	87	0.1					
Collocated Duplicate	DUP-07	10/31/2018	11/6/2018	84	0.1					
Concrete Floor Characterization	ICS-03-25	2/28/2019	3/6/2019	87	1.4					
Collocated Duplicate	DUP-08	2/28/2019	3/5/2019	71	0.7					
Concrete Floor Characterization	ICS-01-63	9/27/2019	10/7/2019	77	0.3					
Collocated Duplicate	DUP-09	9/27/2019	10/7/2019	71	0.2					
Concrete Floor Characterization	ICS-03-27 (1-2)	1/3/2020	1/13/2020	84	< 0.1					
Collocated Duplicate	DUP-10	1/3/2020	1/11/2020	80	<0.1					
Concrete Floor Characterization	ICS-01-72	1/3/2020	1/10/2020	84	0.5					
Collocated Duplicate	DUP-11	1/3/2020	1/11/2020	85	0.7					
Concrete Floor Characterization	ICS-03-68	9/2/2020	9/10/2020	64	0.7					
Collocated Duplicate	DUP-12	9/2/2020	9/9/2020	75	1.0					
Concrete Floor Characterization	ICS-01-84	9/2/2020	9/9/2020	79	< 0.1					
Collocated Duplicate	DUP-13	9/2/2020	9/9/2020	79	< 0.09					
Concrete Floor Characterization	ICS-01-93	4/27/2021	5/5/2021	78	< 0.1					
Collocated Duplicate	DUP-14	4/27/2021	5/5/2021	95	<0.1					
Concrete Wall Characterization	CW-DUP-01	5/29/2020	6/10/2020	95	< 0.1					
Collocated Duplicate	CW-04-04	5/29/2020	6/10/2020	92	<0.1					
Concrete Floor Characterization	ICS-01-101	9/1/2021	9/7/2021	89	0.6					
Collocated Duplicate	DUP-15	9/1/2021	9/7/2021	67	0.2					
Concrete Floor Characterization	ICS-05-26	12/29/2022	1/4/2023	86	< 0.1					
Collocated Duplicate	ICS-DUP-15	12/29/2022	1/9/2022	82	< 0.1					
Concrete Floor Characterization	ICS-05-27	12/29/2022	1/4/2023	83	< 0.1					
Collocated Duplicate	ICS-DUP-16	12/29/2022	1/9/2022	91	<0.1					
Concrete Floor Characterization	ICS-05-28	12/29/2022	1/4/2023	86	< 0.1					
Collocated Duplicate	ICS-DUP-17	12/29/2022	1/9/2022	84	<0.1					
Notes:										

1. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.

Surrogate data is based on recovery precentage of an addee concentration of decaemore
 Analytical results are reported in milligrams per kilograms (mg/kg).
 < indicates the analyte was not detected above the specified laboratory detection limit.</li>
 N/A indicates surrogate recovery data not available.

Sample Type	Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Total PCBs
Concrete Floor Characterization	ICS-05-29	12/29/2022	1/4/2023	86	< 0.1
Collocated Duplicate	ICS-DUP-18	12/29/2022	1/9/2022	92	< 0.1
Concrete Floor Characterization	ICS-02-36	1/27/2023	1/30/2023	68	0.3
Collocated Duplicate	ICS-DUP-19	1/27/2023	1/30/2023	70	0.3
Concrete Floor Characterization	ICS-02-37	1/27/2023	1/30/2023	66	0.5
Collocated Duplicate	ICS-DUP-20	1/27/2023	1/30/2023	66	0.5
Paint Characterization	PS-71	2/28/2019	3/8/2019	N/A	51.0
Collocated Duplicate	DUP-01	2/28/2019	3/7/2019	124	59.3
Paint Characterization	PS-85	2/28/2019	3/6/2019	174	21.6
Collocated Duplicate	DUP-02	2/28/2019	3/5/2019	88	19.8
Paint Characterization	PS-113	9/27/2019	10/3/2019	969	5.1
Collocated Duplicate	DUP-03	9/27/2019	10/3/2019	969	5.7
Paint Characterization	PS-134	5/29/2020	6/9/2020	89	6.1
Collocated Duplicate	DUP-04	5/29/2020	6/10/2020	66	5.0
Paint Characterization	PS-136	5/29/2020	6/9/2020	76	5.6
Collocated Duplicate	DUP-05	5/29/2020	6/10/2020	199	3.4
Paint Characterization	PS-137	5/29/2020	6/10/2020	262	4.5
Collocated Duplicate	DUP-06	5/29/2020	6/10/2020	70	5.2
Paint Characterization	PS-199	4/29/2021	5/5/2021	66	4.6
Collocated Duplicate	DUP-07	4/29/2021	5/4/2021	95	5.6
Paint Characterization	PS-253	9/2/2021	9/12/2021	69	27
Collocated Duplicate	DUP-07	9/2/2021	9/10/2021	71	26.1
Paint Characterization	PS-215	4/29/2021	5/5/2021	75	4.7
Collocated Duplicate	DUP-08	4/29/2021	5/4/2021	90	4
Paint Characterization	PS-230	9/1/2021	9/10/2021	80	3.4
Collocated Duplicate	DUP-08	9/1/2021	9/10/2021	63	3.8
Paint Characterization	PS-220	4/29/2021	5/6/2021	58	2.8
Collocated Duplicate	DUP-09	4/29/2021	5/4/2021	94	4.6
Paint Characterization	PS-224	4/29/2021	5/4/2021	48	1.9
Collocated Duplicate	DUP-10	4/29/2021	5/4/2021	59	2.3
Paint Characterization	PS-225	4/29/2021	5/4/2021	53	2.2
Collocated Duplicate	DUP-11	4/29/2021	5/4/2021	59	2.3
Paint Characterization	PS-264	1/27/2023	1/30/2023	62	2.8
Collocated Duplicate	PS-DUP-12	1/27/2023	1/30/2023	77	4.4
Paint Characterization	PS-265	1/27/2023	1/30/2023	76	14.6
Collocated Duplicate	PS-DUP-13	1/27/2023	1/30/2023	75	3.3
Infill Material Characterization	SS-01	1/27/2023	1/30/2023	76	< 0.04
Collocated Duplicate	SS-DUP-01	1/27/2023	1/30/2023	91	< 0.04

1. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.

Surrogate data is based on recovery percentage of an added concentration of decaemore
 Analytical results are reported in milligrams per kilograms (mg/kg).
 < indicates the analyte was not detected above the specified laboratory detection limit.</li>
 N/A indicates surrogate recovery data not available.

Table 8 - Quality Assurance and Quality Control Results										
Sample Type	Sample ID	Sample Date	Analysis Date	Surrogate Recovery Percentage	Total PCBs					
Infill Material Characterization	SS-03	1/27/2023	1/30/2023	88	< 0.04					
Collocated Duplicate	SS-DUP-02	1/27/2023	1/30/2023	98	< 0.05					
Infill Material Characterization	SS-04	1/27/2023	1/30/2023	85	0.12					
Collocated Duplicate	SS-DUP-03	1/27/2023	1/30/2023	91	< 0.04					
Bulk Material Characterization	2040	1/27/2023	1/30/2023	88	1.2					
Collocated Duplicate	Bulk-DUP-01	1/27/2023	1/30/2023	75	1.0					
Brick Characterization	BR-03-10	9/2/2021	9/7/2021	87	0.5					
Collocated Duplicate	BR-DUP-01	9/2/2021	9/7/2021	89	0.1					
Notes:										

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1. Surrogate data is based on recovery percentage of an added concentration of decachlorobiphenyl.

Surrogate data is based on recovery percentage of an added concentration of decaemore
 Analytical results are reported in milligrams per kilograms (mg/kg).
 < indicates the analyte was not detected above the specified laboratory detection limit.</li>
 N/A indicates surrogate recovery data not available.

	Table 9 - Non-Building Materials Inventory										
Floor	Room	Description	Quantity	Characterization							
1	Cable Vault	Steel Cabinet	1	PCB Remediation Waste							
1	Cable Vault	Boiler/Heater	1	Not regulated for disposal							
1	Room 6	Air Compressor	1	Not regulated for disposal							
1	Stairwell	Steel Locker	4	PCB Remediation Waste							
1	Room 9 (Locker Room & Toilet)	Breaker Panel	1	ACM/PCB Remediation Waste							
2	Office 1	Steel Cabinet	1	PCB Remediation Waste							
2	Office 1	Steel Table	1	PCB Remediation Waste							
2	Office 1	Wood Table	1	PCB Remediation Waste							
2	Office 2	Steel Safe	1	Not regulated for disposal							
2	Room A	Steel Cabinet	1	PCB Remediation Waste							
2	Room A	Reactor	7	ACM/PCB Remediation Waste							
2	Room A	Bushing	25	ACM/PCB Remediation Waste							
2	Room B: Main Switchboard Room	Steel Cabinet	2	PCB Remediation Waste							
2	Room B: Main Switchboard Room	Switchboard Cabinet	2	ACM/PCB Remediation Waste							
2	Room B: Main Switchboard Room	Switchboard Panel	7	ACM/PCB Remediation Waste							
2	Room B: Main Switchboard Room	Relay Cabinet	3	ACM/PCB Remediation Waste							
2	Room B: Main Switchboard Room	Wood Table	2	PCB Remediation Waste							
2	Room B: Main Switchboard Room	Battery Bank	2	Not regulated for disposal							
2	Room B: Main Switchboard Room	Steel Cabinet with Cables	1	PCB Remediation Waste							
2	Storeroom	Steel Locker	1	PCB Remediation Waste							
2	Storeroom	Steel Shelf	1	PCB Remediation Waste							
2	Switchboard Office	Steel Table	1	PCB Remediation Waste							
2	Switchboard Office	Steel/Wood Desk	2	PCB Remediation Waste							
3	East Hallway	Generator	1	PCB Remediation Waste							
3	East Hallway	Steel Cabinet	2	PCB Remediation Waste							
3	East Hallway	Wooden Bench	1	PCB Remediation Waste							
3	East Hallway	Switchboard Cabinet	2	PCB Remediation Waste							
3	Room C	Oil Circuit Breaker	2	PCB Remediation Waste							
3	Room D	Steel Cabinet	6	PCB Remediation Waste							
3	Room D	Steel Shelf	1	PCB Remediation Waste							
3	Room D	Bushing	35	ACM/PCB Remediation Waste							
4	Potential Transformer Upper	Oil Circuit Breaker	18	PCB Remediation Waste							
4	Room F	Oil Circuit Breaker	2	PCB Remediation Waste							
4	Room F	Bushing	6	ACM/PCB Remediation Waste							
5	Lighting Arrestor Room	Lighting Arrestor	12	PCB Remediation Waste							
5	Room G	Engine	1	PCB Remediation Waste							
5	Room G	Bushing	9	ACM/PCB Remediation Waste							

Materials listed comprise non-building materials only. Building materials and characterizations are depicted in Plan Sets 3 through 7.
 Painted steel located throughout the Control House not listed in this table (e.g., hand rails, doors, stairways) are conservatively classified as PCB Remediation Waste.
 Oil-filled electrical equipment currently present within the Control House will be assessed and removed prior to demolition in accordance with applicable state and

federal regulations.

# **RESPONSIBLE PARTY CERTIFICATION**

#### **Responsible Party Certification**

I, William R. Howard, as an authorized representative of The Narragansett Electric Company (TNEC), the party conducting the Self-Implementing Cleanup at the Pawtucket 1 No. 107 Substation, located at 6 Thornton Street in Pawtucket, Rhode Island, hereby certify that: all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental / chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup Site, are on file at TNEC, 280 Melrose Street in Providence, Rhode Island 02907, and are available for EPA inspection.

Signed:	ASA				
Title:	Lead Environmental Professional				
Date:	3/31/2023				

## SITE PHOTOGRAPHS



#### Photo 1

Overview of the east side of the Control House on September 9, 2018, as viewed from the southeast.



**Photo 2** Overview of the south side of the Control House on September 9, 2018, as viewed from the south.



### Photo 3

Overview of the west side of the Control House on September 9, 2018, as viewed from the southwest.



### Photo 4

Overview of the Turbine Room on September 9, 2018, as viewed from the southeast. Note the trap rock covering the floor.

			SITE PHOTOGRAPHS
Offices Th	ONEC Engineers & Scien ROUGHOUT NEW ENGLAND (8	<u>O</u> tists 00) 548-3355	Pawtucket 1 No. 107 Substation Control House 6 Thornton Street Pawtucket, Rhode Island
PHOTOGRAPHER	DATE	CHECKED	
KML	AS NOTED	MAZ	CONECO PROJECT NO. 5675.F.101



**Photo 5** Overview of the turbine room on September 9, 2018, as viewed from the northwest.



#### Photo 6

Concrete foundations associated with former turbines on September 2, 2021, as viewed from the southwest.



### Photo 7

Overview of Room No. 2, located adjacent to the Turbine Room on September 9, 2018, as viewed from the east.



### Photo 8

Overview of the second floor Office 1 room, where PCB Remediation Waste has been identified in the ceiling paint and concrete as well as the rubber floor matting, on April 29, 2021, as viewed from the northwest.

			SITE PHOTOGRAPHS
Offices Thi	ONEC Engineers & Scien Roughout New England (8)	00) 548-3355	Pawtucket 1 No. 107 Substation Control House 6 Thornton Street
PHOTOGRAPHER	DATE	CHECKED	PAWTUCKET, RHODE ISLAND
KML	AS NOTED	MAZ	CONECO PROJECT NO. 5675.F.101



#### Photo 9

A view of paint and concrete ceiling samples collected from the second floor Office 1 on September 2, 2021.



### Photo 10

Overview of the northern portion of the main switchboard room located on the second floor on September 9, 2018, as viewed from the southeast.



## Photo 11

Overview of the third floor East Hallway, comprising PCB Remediation Waste, on April 29, 2021, as viewed from the north.



## Photo 12

Overview of the mezzanine located on the fourth floor on September 9, 2018, as viewed from the north.

			SITE PHOTOGRAPHS
OFFICES THI	ONEC Engineers & Scien ROUGHOUT NEW ENGLAND (8)	00) 548-3355	PAWTUCKET 1 NO. 107 SUBSTATION Control House 6 Thornton Street
PHOTOGRAPHER	DATE	CHECKED	PAWTUCKET, RHODE ISLAND
KML	AS NOTED	MAZ	CONECO PROJECT NO. 5675.F.101

## LABORATORY ANALYTICAL DOCUMENTATION

#### Laboratory Analytical Documentation

Please use this link to access Appendix 3, Laboratory Analytical Documentation:

Pawtucket 1 No. 107 Substation Control House