

April 21, 2022

Mr. Steve Ferreira Regional PCB Coordinator, Region 2 United States Environmental Protection Agency 290 Broadway New York, NY 10007-1866

Re: Pre-Design Investigation Scope of Work

Katzman Recycling Site NYSDEC Site No. 558035 Granville, New York

Thank you for the opportunity to submit this Pre-Design Investigation (PDI) Scope of Work for the Katzman Recycling Site (Site) located at 24 County Route 26 in the Town of Granville, Washington County, New York (refer to **Figure 1** for Site Location). The purpose of this Scope of Work is to describe the planned investigation to further define the lateral and vertical extent of polychlorinated biphenyl (PCB) impacts in surface and subsurface soil at Site, to provide a basis for volume estimates and a remediation cost estimate, and to support final design of the remedial action for the Site.

This PDI Scope of Work has been prepared, consistent with the Record of Decision (ROD) for the Site, and in accordance with Title 6 of New York Codes, Rules and Regulations (6 NYCRR) Part 375 and NYSDEC Technical Guidance for Site Investigation and Remediation (DER-10).

As requested in our last meeting regarding this project, this PDI Scope of Work is being shared with the United States Environmental Protection Agency (USEPA) as a courtesy. The results of the Scope of Work will be provided to USEPA in the Risk-Based Disposal Approval application to be submitted after completion of the investigation. We anticipate implementing this PDI Scope of Work in June 2022, and expect to submit the Risk-Based Disposal Approval application in December 2022.

1.0 INTRODUCTION

1.1 General

The Site is being managed under the NYSDEC inactive hazardous waste disposal site program (State Superfund Program), and is listed as Site No. 558035. The investigation and design tasks are being undertaken by TRC Engineers, Inc. (TRC), a Superfund Standby Engineering Contract with NYSDEC. The activities described in this document will be performed in accordance with the Field Activities Plan (FAP), Health & Safety Plan (HASP), and Quality Assurance Project Plan (QAPP) prepared for this contract and applicable to the work assignment.

There is no known zoning plan in the Town of Granville; however, according to the Washington County property description records, the property is zoned Commercial. The surrounding parcels are currently used for a combination of commercial, agricultural, and residential purposes. The approximately 20.3-acre Site is bounded by County Route 26 and commercial properties to the west (refer to **Figure 2**). Adjacent to the Site along the southwestern boundary is a tractor equipment supplier and New York State

Route 22. Warner's Auto Body, an auto sales and repair business, is directly north of the western portion of the property, and vehicles associated with the auto body property have been observed encroaching on the Site. Further north are athletic fields and farmland. Directly east of the property is a former Delaware and Hudson Railroad roadbed that has been converted into a recreational trail. Further to the east are agricultural land and undeveloped land.

1.2 Site History and Use

In or around 1949, the property was purchased by Samuel Katzman, who subsequently operated the Site as a facility which accepted various metal products for recovery and recycling. This operation continued for approximately 58 years, until approximately 2007. A former incinerator building used during historical operations is centrally located on the Site (refer to **Figure 3**). Associated incinerator waste (i.e., used auto parts, carburetors, chain saws, automobiles, heavy equipment, white goods, transformer carcasses, capacitors, and other electrical equipment) is present to the north, west, and south of the structure, as well as in a pile located along the embankment in the southwest part of the Site. The area east of the former incinerator building has been identified as the location where capacitors and transformers were likely dismantled. Additionally, to the east of the former incinerator building, several older model automobiles were discovered, scattered throughout the woods. There is a dilapidated pole barn, which was potentially used for storage and mechanical work, near the northwestern corner of the Site. Note that detailed operational records for the Site are not available.

1.3 Investigation and Remediation History

Investigation of the Site began in 2006, when NYSDEC conducted a limited Site sampling event to identify contaminants of concern south and east of the former incinerator building. Based on the findings, the Site was classified as a Class 2 Inactive Hazardous Waste Disposal Site by NYSDEC and assigned Site No. 558035.

Between October 2014 and January 2015, an Interim Remedial Measure (IRM) was implemented which included the excavation of surface soil and former transformer "windings" impacted with PCBs, lead, and arsenic south and east of the incinerator building. Approximately 2,200 tons of soil were removed and transported off-Site for disposal. The excavations were reportedly backfilled to grade with imported soil.

Between December 2015 and June 2017, a Remedial Investigation (RI) was undertaken. Field activities consisted of wetland and waterbody delineation; a land survey of property boundaries, topography, prominent Site features/structures, and RI sampling locations; advancement of test pits and direct push soil borings; installation of groundwater monitoring wells; collection and laboratory analysis of soil, groundwater, surface water, and sediment samples; and removal of a 2,000-gallon aboveground storage tank (AST) from the former incinerator building. Detailed descriptions of RI field activities and findings are included in the RI Report and summarize within this document. The RI results indicated that PCB impacts were present in several areas across the Site, but most consistently associated with areas surrounding the former incinerator building.

A Focused Feasibility Study (FFS), prepared by TRC, was completed in August 2018, to evaluate remedial alternatives for PCB impacts in soil. A ROD was subsequently issued in February 2020,



describing the selected remedy: Excavation to Commercial Use Soil Cleanup Objectives (CU-SCO) with future Site Management. The ROD further identifies the CU-SCOs for total PCBs in soil as 1.0 milligram per kilogram (mg/kg) in surface soils and 10 mg/kg in subsurface soils.

1.4 Planned Remedial Design and Remedial Action

Based on the selected remedy, the primary elements of the Planned Remedial Design and Remedial Action include:

- Pre-Design and Remedial Design Activities:
 - Site clearing, and sorting and consolidation of the various piles of rubbish and debris;
 - o Demolition of the former Incinerator Building;
 - Completion of a PDI to further define the horizontal and vertical extents of PCB impacts, delineating to a target of 1 mg/kg (subject of this scope of work); and
 - o Completion of the Remedial Design.

Remedial Action Activities:

- Excavation and removal of PCB impacted surface soil (>1 mg/kg, 1-foot depth) and subsurface soil (>10 mg/kg); approximate volume of 9,400 cubic yards;
- Verification sampling consistent with NYSDEC guidelines (30-foot grid);
- Disposal of excavated soil with PCBs >10 mg/kg and <50 mg/kg at a permitted off-Site disposal facility;
- Disposal of excavated soil with PCBs ≥50 mg/kg at a TSCA-regulated facility;
- Reuse of excavated soil ≤10 mg/kg as backfill, one foot or greater below ground surface;
- Completion of backfilling of the subsurface zone using supplemental imported backfill material; and,
- Importing and placing a clean soil cover consistent with NYSDEC Part 375 Regulations and vegetation.

Engineering and Institutional Controls:

- Cover System Where a soil cover is to be used it will be a minimum of one foot of soil
 placed over a demarcation layer, with the upper six inches of soil of sufficient quality to
 maintain a vegetative layer;
- Institutional Controls Imposition of an institutional control in the form of an environmental easement for the controlled property; and,
- Site Management Plan The Site Management Plan will be prepared following completion of the Remedial Action and will describe the soil below the cover layer (subsurface soil with PCB concentrations equal to or less than 10 mg/kg and above 1 mg/kg), applicable land and groundwater use restrictions and engineering controls for the Site. The Site Management Plan will detail the steps and media-specific requirements necessary to ensure the institutional and engineering controls remain in place and effective.

The project is currently in the PDI phase, with upcoming activities including debris sorting and consolidation of the various debris piles at the Site, as well as demolition of the former Incinerator Building. Completion of these activities will provide access to previously inaccessible areas and facilitate completion of the PDI. The following sections discuss the data collected and delineation activities



performed to date, as well as the planned PDI and delineation activities to be performed in advance of Remedial Design.

2.0 SUMMARY OF FOCUSED PCB DELINEATION ACTIVITIES AND RESULTS

2.1 Investigation Summary

In November 2016, as part of the RI field work, a supplemental subsurface investigation was completed for the purpose of further defining the extent of PCB impacts in soil. Soil samples were collected from a total of 36 locations where PCBs had previously been identified above the SCOs, extending both horizontally and vertically beyond the limits of previously identified impacts. The additional soil boring locations were advanced on an approximately 40-foot by 40-foot grid over the former waste accumulation area (**refer to Figures 4 through 10**). Sample locations were adjusted in the field as necessary to account for large debris piles, trees and the former incinerator building.

Soil samples were collected continuously in 5-foot long 2-inch diameter macro-core samplers to a minimum depth of 10 feet below ground surface (bgs). Borings were advanced an additional 4 feet in two locations (KTZ-SB-C7 and KTZ-SB-D2) where debris was encountered at or near ten feet below grade. Soil samples collected from each boring were screened with a photoionization detector (PID) and inspected for indications of impacts (e.g., staining, odors, etc.).

Soil samples were divided into 2-foot long intervals for laboratory analysis of PCBs by USEPA Method 8082A. The specific intervals submitted for laboratory analysis were 0-2 feet below ground surface (bgs), 2-4 feet bgs, 4-6 feet bgs, 6-8 feet bgs, 8-10 feet bgs, 10-12 feet bgs (2 borings), and 12-14 feet bgs (2 borings). The results of the analyses are summarized below and on **Figures 5 through 10**.

2.2 Summary of Results

0 - 2 feet bgs:

Twenty-four (24) of the thirty-six (36) soil samples collected from the 0 – 2 feet bgs interval exhibited total PCB concentrations above the surface soil CU-SCO of 1.0 mg/kg (refer to **Figures 4 and 5**). The locations included: KTZ-SB-A1, KTZ-SB-A2, KTZ-SB-A3, KTZ-SB-B1, KTZ-SB-B2, KTZ-SB-B3, KTZ-SB-B4, KTZ-SB-C1, KTZ-SB-C2, KTZ-SB-C3, KTZ-SB-C4, KTZ-SB-C5, KTZ-SB-D3, KTZ-SB-D5, KTZ-SB-D6, KTZ-SB-E1, KTZ-SB-E2, KTZ-SB-E3, KTZ-SB-E4, KTZ-SB-E5, KTZ-SB-E6, KTZ-SB-E7, KTZ-SB-F3, and KTZ-SB-F7. Total PCB concentrations ranged from 1.77 mg/kg (KTZ-SB-A3) to 1,093 mg/kg (KTZ-SB-C4).

The concentrations of PCBs in samples from several test pit locations also exceeded the CU-SCO for surface soil. As appropriate, these test pit sample locations (KTZ-TP-7, KTZ-TP-13, KTZ-TP-17, AND KTZ-TP-22) are also shown on **Figure 5**.

Samples from 6 isolated locations beyond the main waste accumulation area also contained concentrations that slightly exceeded the CU-SCO for surface soil (1.0 mg/kg). Concentrations at these outlying locations ranged from 1.22 mg/kg at KTZ-SS-27, to 4.95 mg/kg at KTZ-TP-28.



2 – 4 feet bgs:

Eight (8) of the thirty-six (36) soil samples collected from the 2 – 4 feet bgs interval exhibited total PCB concentrations above the subsurface soil CU-SCO of 10 mg/kg (refer to **Figures 4 and 6**). The eight locations are as follows: KTZ-SB-B2, KTZ-SB-B3, KTZ-SB-B6, KTZ-SB-C5, KTZ-SB-C7, KTZ-SB-D2, KTZ-SB-D4, and KTZ-SB-E4. Total PCB concentrations ranged from 10 mg/kg (KTZ-SB-B2) to 120 mg/kg (KTZ-SB-C5).

The concentrations of PCBs in samples from several test pit locations also exceeded the CU-SCO for subsurface soil. As appropriate, these test pit sample locations (KTZ-TP-11, KTZ-TP-13, and KTZ-TP-15) are also shown on **Figure 6**.

4 – 6 ft bgs:

Six (6) of the thirty-six (36) soil samples collected from the 4 – 6 feet bgs interval exhibited total PCB concentrations above the subsurface soil CU-SCO of 10 mg/kg (refer to **Figures 4 and 7**). The six locations are as follows: KTZ-SB-B5, KTZ-SB-B6, KTZ-SB-C2, KTZ-SB-C6, KTZ-SB-D4, and KTZ-SB-E6. Total PCB concentrations ranged from 11.2 mg/kg (location KTZ-SB-C2) to 180 mg/kg (location KTZ-SB-B5).

The concentration of PCBs in a sample from test pit location KTZ-TP-18 also exceeded the CU-SCO for subsurface soil as shown on **Figure 7**.

<u>6 – 8 feet bgs:</u>

Four (4) samples collected from the 6 – 8 feet bgs interval exhibited total PCB concentrations above the subsurface soil CU-SCO of 10 mg/kg (refer to **Figures 4 and 8**). The four locations are as follows: KTZ-SB-B6, KTZ-SB-C6, KTZ-SB-D1, and KTZ-SB-D3. Total PCB concentrations ranged from 11.31 mg/kg (location KTZ-SB-D3) to 24.9 mg/kg (location KTZ-SB-B6).

8 – 10 feet bgs:

Two (2) soil samples collected from the 8 – 10 feet bgs interval exhibited total PCB concentrations above the subsurface soil CU-SCO of 10 mg/kg (refer to **Figures 4 and 9**). Total PCB concentrations at these two locations were: KTZ-SB-D2 - 33 mg/kg and KTZ-SB-C6 - 36 mg/kg.

10 - 12 feet bgs:

Two (2) of the soil borings (KTZ-SB-C7 and KTZ-SB-D2) were advanced to 12 feet bgs and one (1) soil sample collected from 10 – 12 feet bgs from each boring was submitted for analysis. Neither sample exhibited a total PCB concentration above the subsurface soil CU-SCO.

12 - 14 feet bgs:

Two (2) of the soil borings (KTZ-SB-C7 and KTZ-SB-D2) were advanced to 14 feet bgs and one (1) soil sample collected from 12 – 14 feet bgs from each boring was submitted for analysis. Neither sample exhibited a total PCB concentration above the subsurface soil CU-SCO.



In order to complete the delineation of the horizontal and vertical extent of PCB impacts in soil for remedial design, a PDI soil sampling program has been developed and is described in this section. **Figure 10** illustrates the proposed sampling locations, and **Table 1** presents the sampling intervals proposed for analysis. As part of the soil boring program, soil sampling will additionally be performed in the wooded area east of the former incinerator building, in response to questions expressed during the ROD public comment period. Additionally, borings will be advanced into the slope southwest of the former incinerator building to further characterize the nature and extent of the debris in this part of the Site.

The PDI scope of work has been developed targeting a Site-wide PCB delineation value of 1 mg/kg (surface and subsurface), in response to a USEPA request. Delineation and removal of surface soil with PCB concentrations greater than 1 mg/kg is consistent with the ROD. However, remediation of subsurface soil with concentrations greater than 1 mg/kg PCBs is not a requirement of the ROD. Impacted subsurface soil with PCBs concentrations above 1 mg/kg PCBs will be identified, documented and included in the Site Management Plan as part of the remedy.

A direct push drill rig will be used to advance soil borings to further define the lateral and vertical extent of PCB impacts (i.e., PCB concentrations greater than 1.0 mg/kg in surface and subsurface soil) and to further delineate the areas of PCB concentrations in soil equal to or greater than 50 mg/kg. The locations proposed for these soil borings are illustrated on **Figure 10**, and the sampling plan is provided in **Table 1**. Soil samples will be collected continuously from ground surface to completion depth (at most locations), inspected and classified by soil type, and screened with a photoionization detector (PID). Samples from selected intervals (indicated in **Table 1**) will be placed in laboratory provided glassware, and shipped to an analytical laboratory for analysis. Surface soil samples will be collected using a dedicated/disposable scoop or spoon. Additional details regarding the proposed sampling plan are presented below.

- Approximately 14 soil borings (KTZ-SB-201 through KTZ-SB- 214) will be advanced in and around areas that were previously inaccessible (below waste piles and beneath the former incinerator building). These borings will be advanced to a depth of 12 feet bgs and sampled continuously. Including surface soil samples collected from the upper 2 inches of soil, approximately 98 samples will be submitted to the analytical laboratory for analysis for PCBs. Refer to Table 1 for the intervals targeted for laboratory analysis.
- Approximately 5 soil borings (KTZ-SB-215 through KTZ-SB- 219) will be advanced within the footprint of the large debris/waste accumulation area located southwest of the former incinerator building, along the slope. These borings will be advanced to a depth of up to 20 feet or 2 feet into native material, whichever is shallower, and sampled continuously. Due to the difference in surface grade, borings KTZ-SB-215 and KTZ-SB-219 are expected to be advanced to the full depth of 20 feet, while at KTZ- SB-216, KTZ-SB-217, and KTZ-SB-218 it is expected that native material will be encountered at shallower depth (16 feet bgs is expected). Samples will be collected as noted above, except surface soil samples will not be collected in this area due to the non-native nature of the material. Approximately 28 samples will be submitted to the analytical laboratory for analysis for PCBs. Refer to Table 1 for the intervals targeted for laboratory analysis.



- Approximately 9 soil borings (KTZ-SB-220 through KTZ-SB-228) will be advanced in areas where PCBs were previously found at concentrations at or above 50 mg/kg, to further delineate (laterally), with the objective of minimizing the volume of soil that will need to be managed as Toxic Substances Control Act (TSCA)-regulated material. These borings will be advance to the depths that PCBs were previously detected at elevated concentrations and sampled continuously. Approximately 32 samples will be submitted to the analytical laboratory for analysis for PCBs. Refer to Table 1 for the intervals targeted for laboratory analysis.
- Approximately 12 soil borings (KTZ-SB-229 through KTZ-SB- 240) will be advanced around the
 perimeter of the main waste accumulation area, focusing on locations where PCBs have been
 previously detected at concentrations above 1.0 mg/kg in surface and/or subsurface soil. These
 borings will be advanced to the depths that PCBs were previously detected at elevated
 concentrations and sampled continuously. Approximately 42samples will be submitted to the
 analytical laboratory for analysis for PCBs. Refer to Table 1 for the intervals targeted for laboratory
 analysis.
- Up to six composite soil samples will be collected from selected borings for waste characterization purposes. These samples will be submitted to the analytical laboratory for analysis of full waste characterization parameters.
- Four borings will be advanced at previously investigated location KTZ-SB-C4, KTZ-SB-C5, KTZ-SB-C6, and KTZ-SB-D4, to further delineate the vertical extent of contamination at these locations. These borings will be advanced to a depth of 10 feet, without sampling. Each boring will then be extended to an overall depth of 14 feet bgs, and 2 samples (from each boring) will be collected and submitted to the analytical laboratory for analysis for PCBs. Refer to Table 1 for the intervals targeted for laboratory analysis.
- Up to 10 surface soil samples will be collected and analyzed for PCBs. The surface soil samples will be collected in the vicinity of the "outlying" locations discussed previously, where surface soils with PCB concentrations above 1.0 mg/kg were identified (locations KTZ-SS-2, KTZ-SS-5, and KTZ-SS-16 [not shown on the map]).
- Additionally, up to ten soil borings will be advanced in the eastern portion of the property. The locations will be selected in the field based on surface conditions and access. Samples will be collected from the surface (0 to 2 inches) and from 2 to 4 feet bgs. Soil samples will be inspected, classified by soil type, and screened with a PID. Each sample (i.e., a total of approximately 20 soil samples) will be submitted to the analytical laboratory for PCB analysis.

Groundwater samples from two monitoring wells, KTZ-MW-3 and KTZ-MW-4, will be collected and analyzed for TCL VOCs, TCL SVOCs, PCBs, Target Analyte List (TAL) metals (including mercury and cyanide), pesticides, and herbicides to determine treatment needs (if any) associated with potential dewatering of the remedial excavations. Both filtered and unfiltered samples will be analyzed.



4.0 REPORTING

The results of the PDI will be used to finalize the impacted material volume estimates above the target delineation value of 1 mg/kg, as well as above the CU-SCOs of 1 mg/kg for surface soil and 10 mg/kg for subsurface soil, consistent with the ROD. The PDI results will be further used to refine the remedial action cost estimate, as well as to support the design of the remedy. The results will also be used for preparation of a Risk-Based Disposal Application in accordance with Title 40 of the Code of Federal Regulations (40 CFR) Part 761.61(c). The Risk-Based Application is expected to be submitted for USEPA review in December 2022.

We appreciate the opportunity to provide this courtesy deliverable to USEPA, and we look forward to continuing to support the collaborative relationship on this and other PCB remediation projects in New York.

Sincerely,

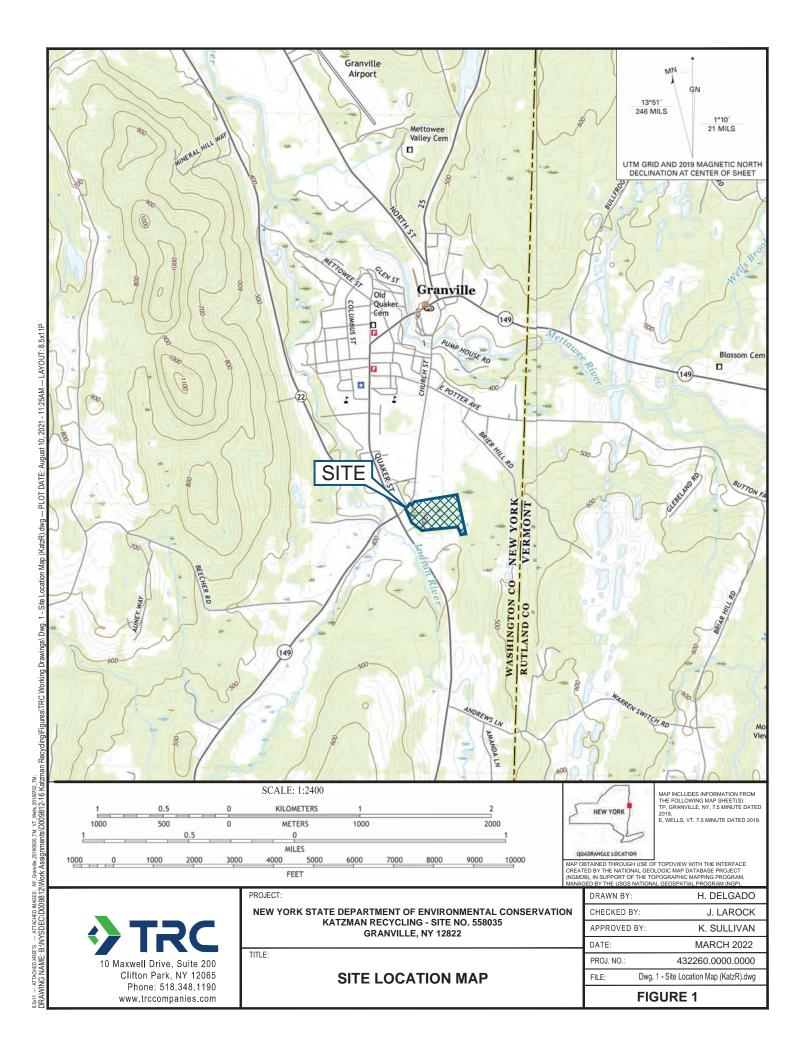
TRC Engineers, Inc. Kevin D. Sullivan, P.E. Project Manager

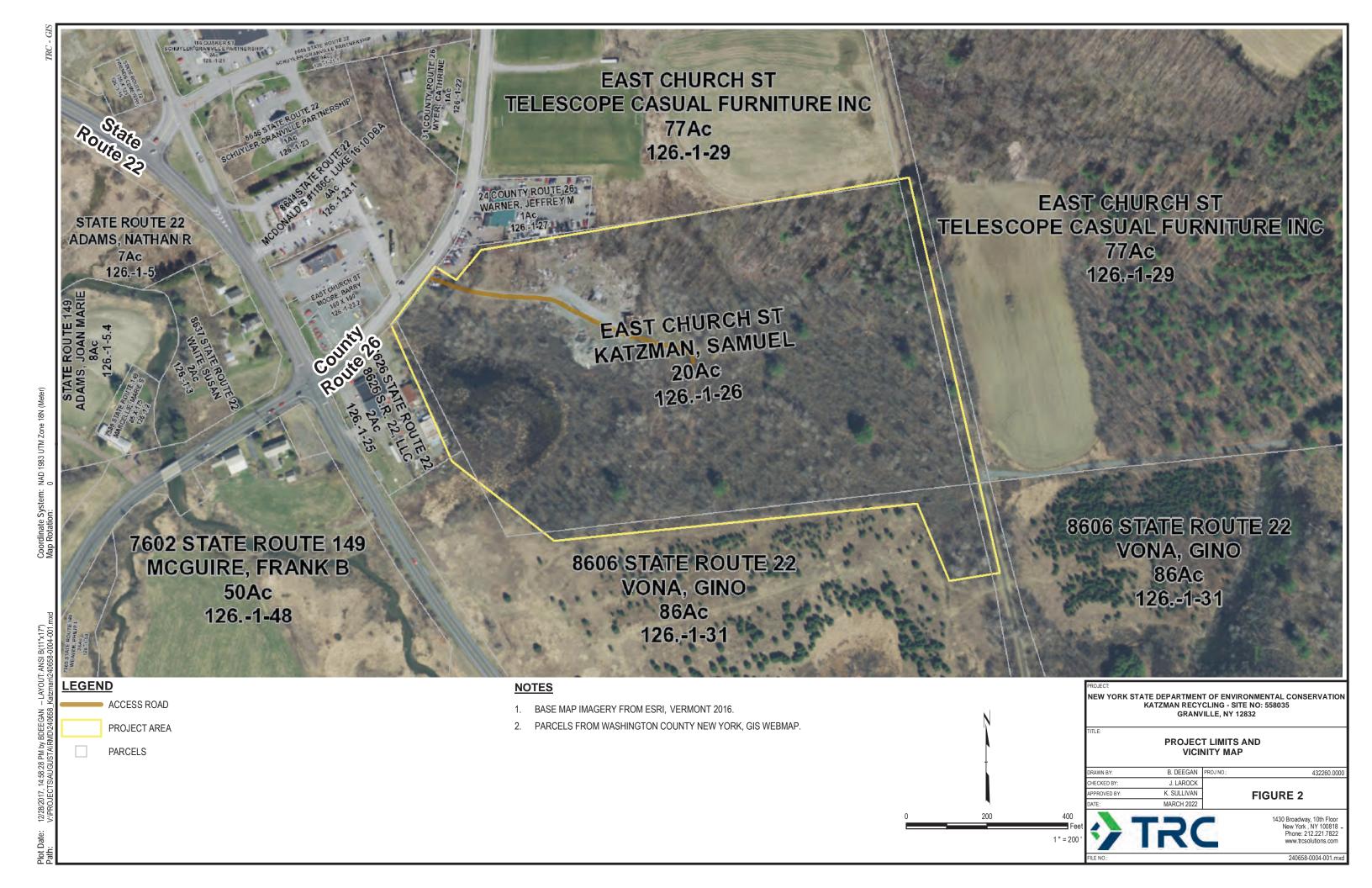
Cc: Brianna Scharf, NYSDEC Sarah Saucier, NYSDEC Dave Glass, TRC Jim Magda, TRC

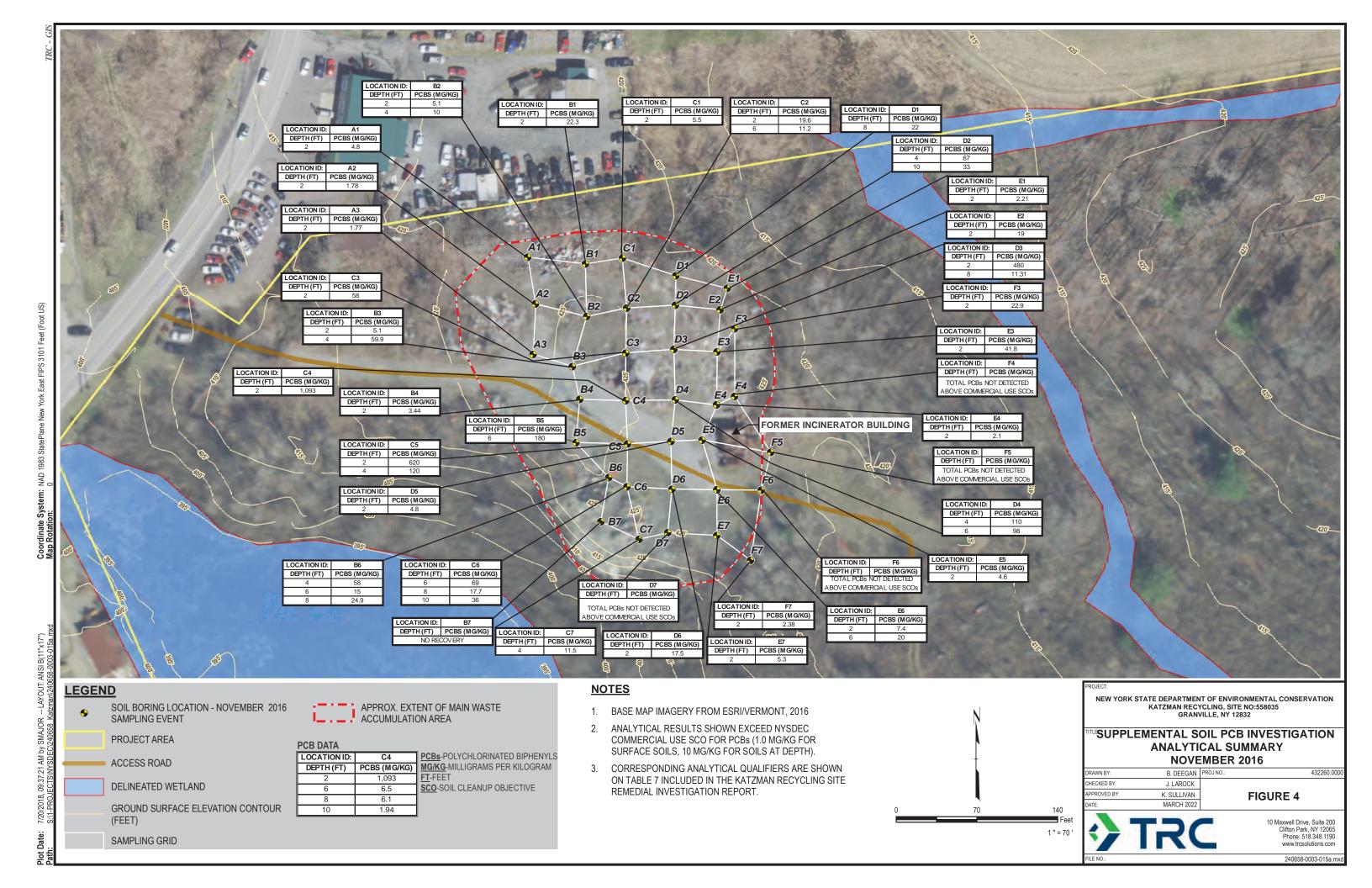


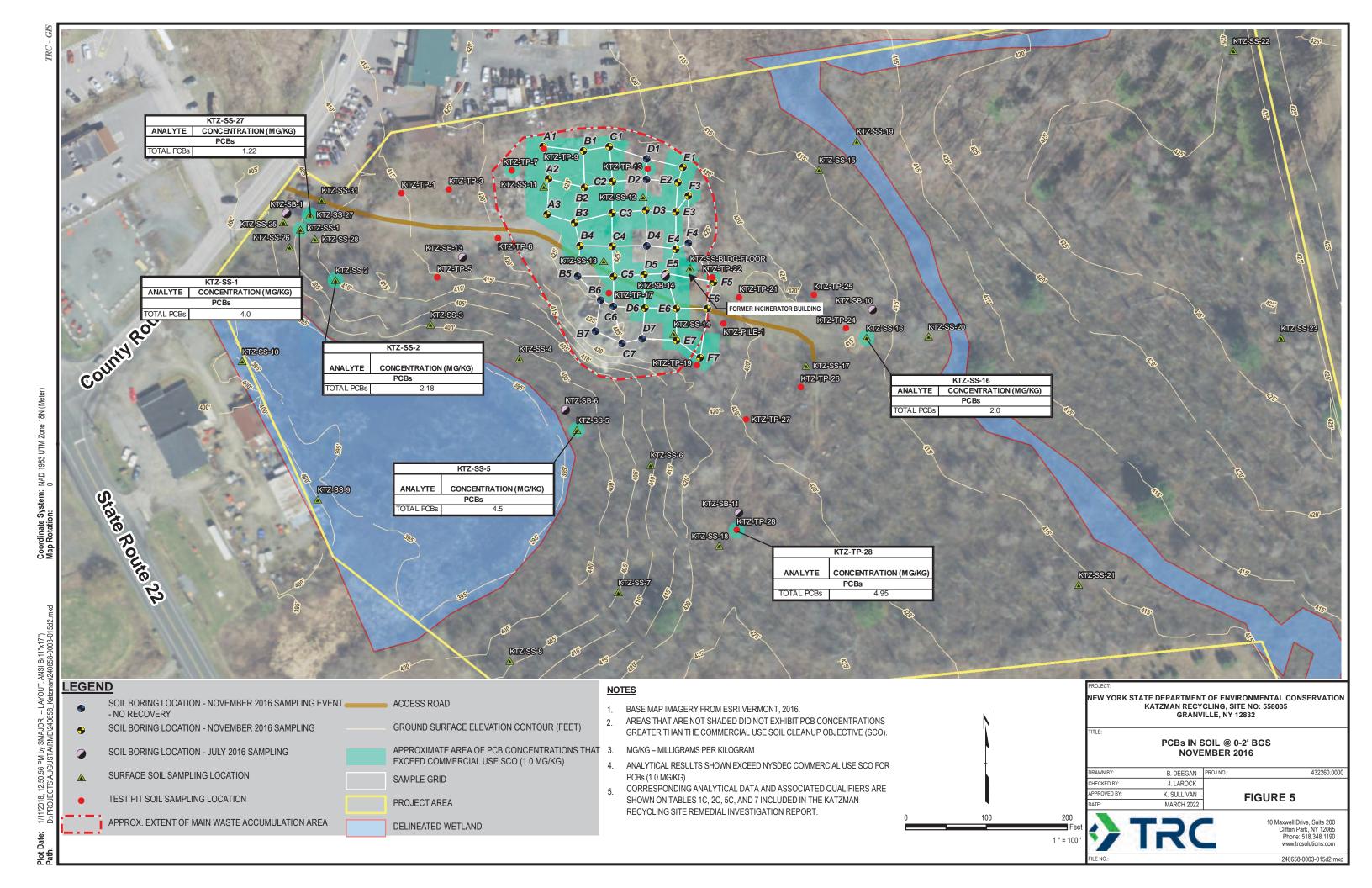
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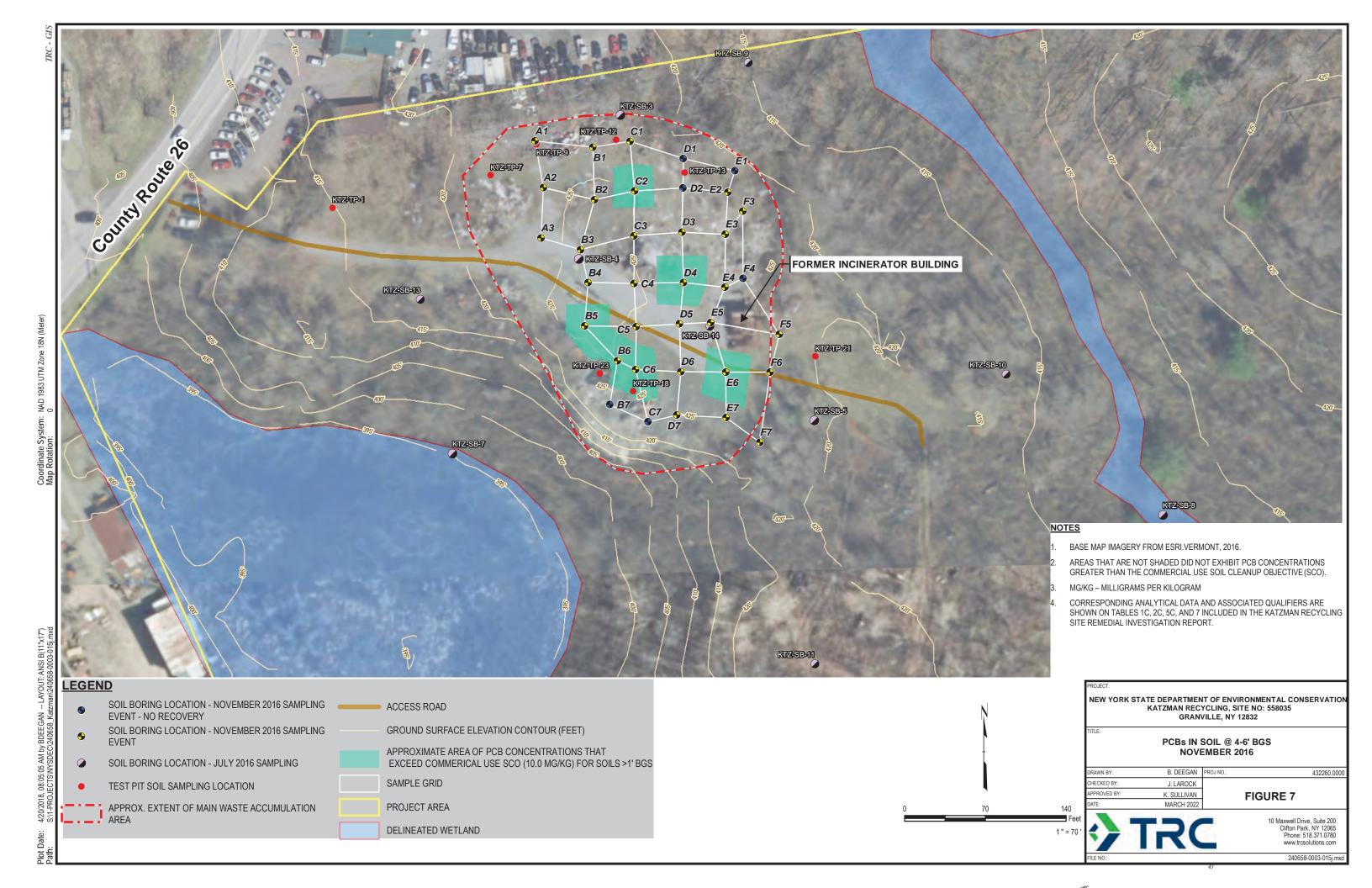


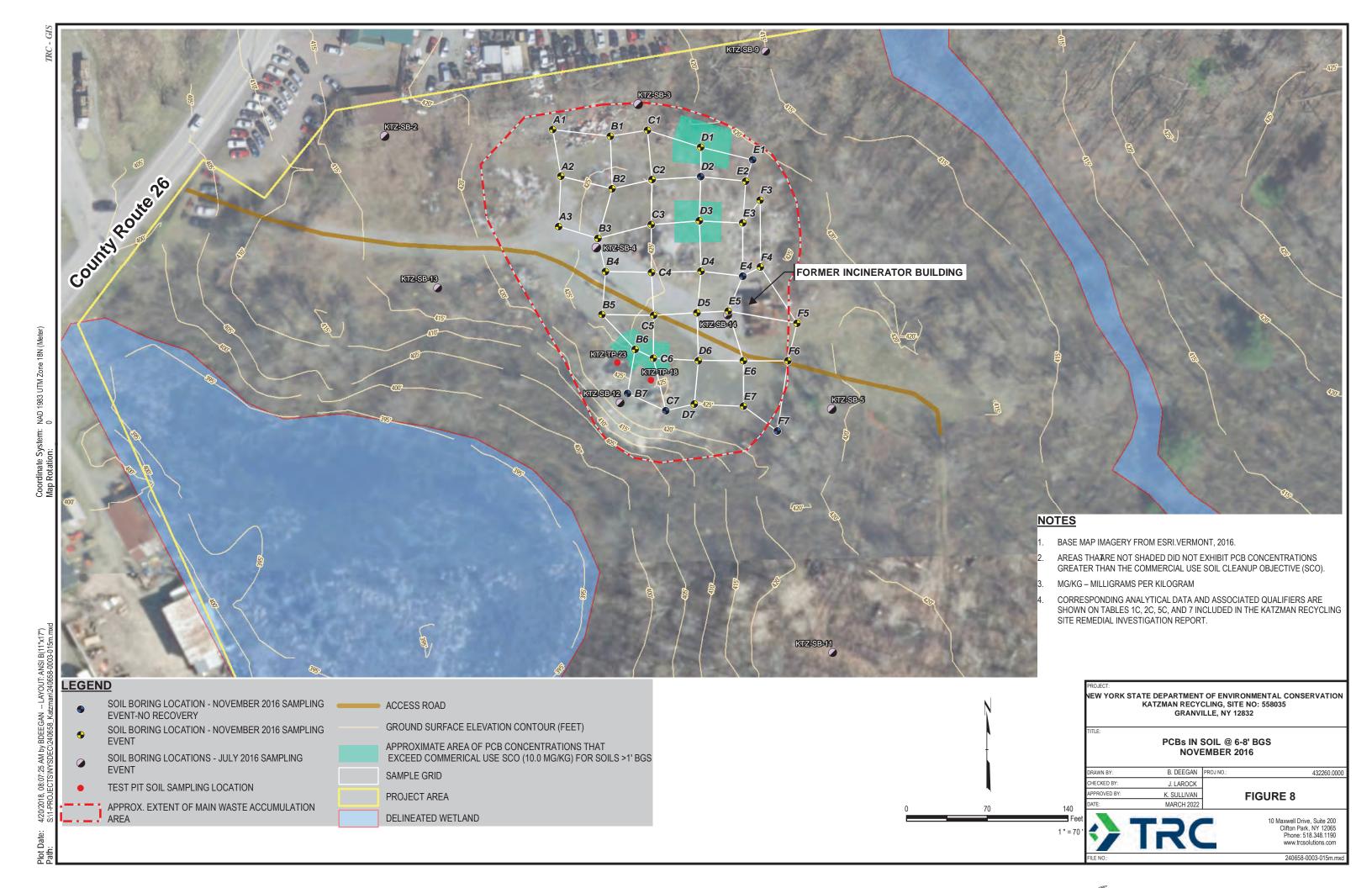


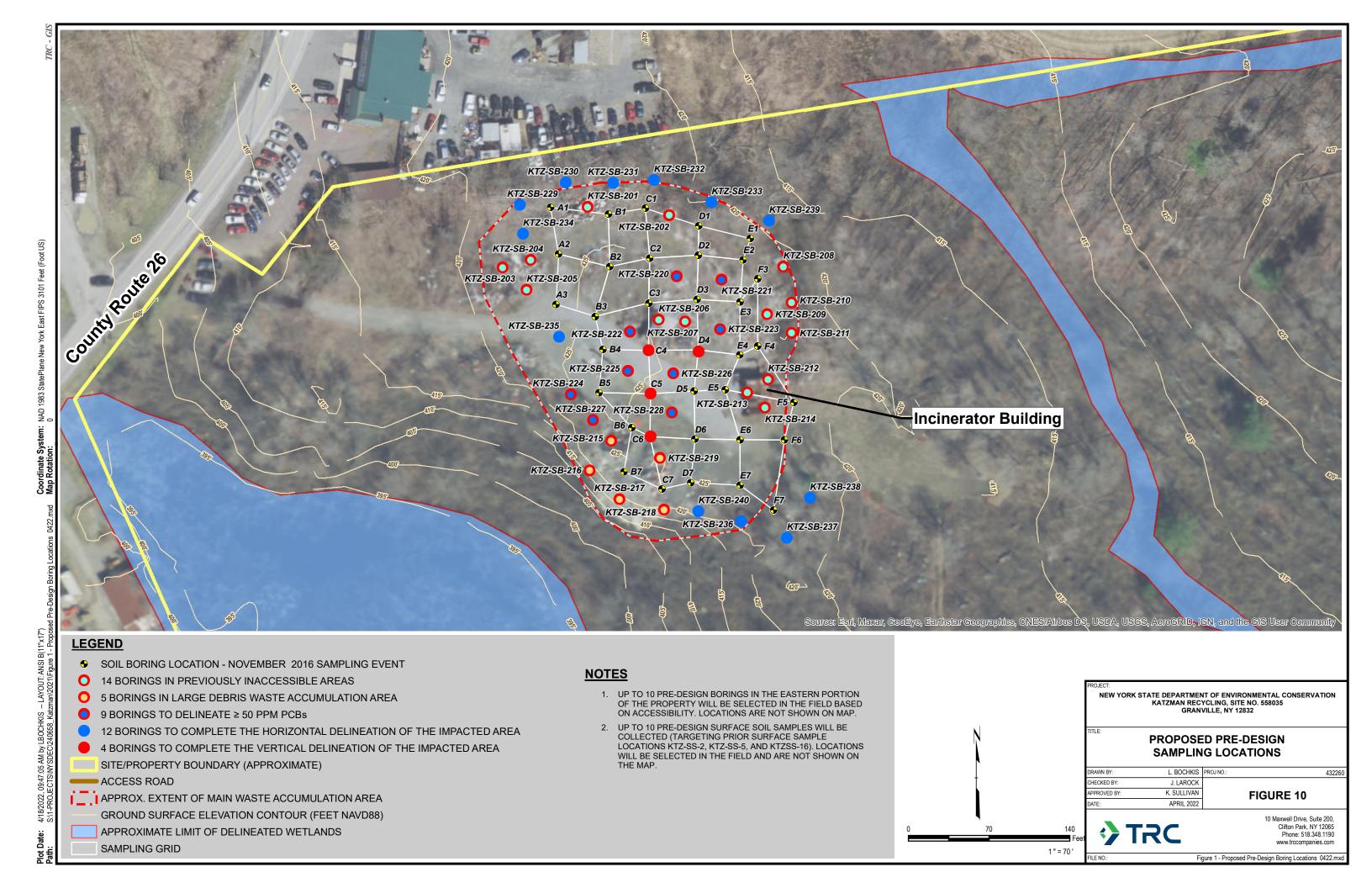












Table



Table 1 New York State Department of Environmental Conservation Katzman Recycling Site Pre-Design Investigation Sampling Plan

Proposed Depth Intervals to be Submitted for Laboratory Analys												for Laboratory Analysis
Boring ID No.	0 in – 2 in	0 ft - 2 ft	2 ft – 4 ft	4 ft – 6 ft	6 ft – 8 ft	8 ft – 10 ft	10 ft – 12 ft	12 ft – 14 ft	14 ft – 16 ft	16 ft – 18 ft	18 ft – 20 ft	Focus of Boring Location
Previously Inaccessible Locations												
KTZ-SB-201	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-202	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-203	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-204	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-205	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-206	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-207	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-208	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-209	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-210	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-211	X	X	X	X	X	X	X					Former waste pile
KTZ-SB-211	X	X	X	X	X	X	X					Former incinerator building
KTZ-SB-212	X	X	X	X	X	X	X					Former incinerator building
KTZ-SB-214	X	X	X	X	X	X	X					Former incinerator building
Large Debris/Wa						Λ	Λ					Former incinerator building
	sie A			m Ar	_	l	37		37		37	D 1 4 1
KTZ-SB-215		X	X	37	X	37	X	37	X		X	Buried waste pile
KTZ-SB-216		X		X		X		X	X			Buried waste pile
KTZ-SB-217		X		X		X	7.7		X			Buried waste pile
KTZ-SB-218		X	77	X	37	X	X	X	X		37	Buried waste pile
KTZ-SB-219	CD >	X	X		X		X		X		X	Buried waste pile
Delineation of Po	CBs >			l				ı			ı	
KTZ-SB-220		X	X	X								Delineation of >50 ppm at D2, D3
KTZ-SB-221		X	X	X								Delineation of >50 ppm at D2, D3
KTZ-SB-222		X	X				X					Delineation of >50 ppm at C4
KTZ-SB-223		X	X	X			X					Delineation of >50 ppm at D3, D4
KTZ-SB-224			X	X	X							Delineation of >50 ppm at B5
KTZ-SB-225		X	X	X	X		X					Delineation of >50 ppm at B5, C4, C5
KTZ-SB-226		X	X	X			X					Delineation of >50 ppm at C4, C5, D4
KTZ-SB-227			X	X	X							Delineation of >50 ppm at B5
KTZ-SB-228		X	X	X			X					Delineation of >50 ppm at C5
Main Waste Accumulation Area, Horizontal and Vertical Delineation												
KTZ-SB-229	X	X										5.4 ppm at A1 at surface
KTZ-SB-230	X	X										5.4 ppm at A1 at surface
KTZ-SB-231	X	X	X	X	X		X					27.7 ppm at B1, former waste pile
KTZ-SB-232	X	X	X									7.1 ppm at C1 at surface
KTZ-SB-233				X	X	X						27 ppm at D1 at 8 feet
KTZ-SB-234	X	X	X									5.4 ppm at A1, 2.5 ppm at A2
KTZ-SB-235	X	X	X	X								A3, B3, B4 delineation
KTZ-SB-236	X	X	X	X	X	X	X					6.1 ppm at E7, 3.03 ppm at F7
KTZ-SB-237	X	X										3.03 ppm at F7 at surface
KTZ-SB-238	X	X										3.03 ppm at F7 at surface
KTZ-SB-239	X	X										2.21 ppm at E1 at surface
KTZ-SB-240	X	X	X	X	X	X						Surface and subsurface samples at D7
C4							X	X				Sampling deeper at prior location
C5							X	X				Sampling deeper at prior location
C6							X	X				Sampling deeper at prior location
D4							X	X				Sampling deeper at prior location
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