AOC-735 PCB Self Implementing Cleanup Plan

Massena East
New York
NYSDEC Site Code #645009

Prepared for:

Reynolds Metals Company, LLC

Prepared by:

EHS Support

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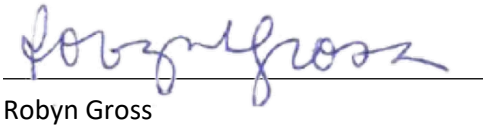
Acronyms

bgs	below ground surface
bss	below soil surface
CAMP	Community Air Monitoring Plan
CFR	Code of Federal Regulations
DER	Division of Environmental Remediation
ft	feet
HASP	health and safety plan
HDPE	high-density polyethylene
mg/kg	milligram per kilogram
NYSDEC	New York State Department of Environmental Conservation
PCB	polychlorinated biphenyl
ppm	part per million
RCRA	Resource Conservation and Recovery Act
RMC	Reynolds Metals Company
ROD	Record of Decision
SCO	soil cleanup objective
SIP	Self Implementing Cleanup Plan
SOW	scope of work
TSCA	Toxic Substances Control Act
UHW	Uniform Hazardous Waste Manifest
USEPA	United Stated Environmental Protection Agency

Certification

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 with Reynolds Metals Company LLC (RMC) (Property RMC Representative) and are available for EPA inspection upon request.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.



09.03.2025

Robyn Gross
Vice President Reynolds Metals Company, LLC
Site RMC Representative and Cleanup Party

Date

1 Introduction

This Self Implementing Cleanup Plan (SIP) has been prepared to describe the scope of work (SOW) for the removal of polychlorinated biphenyl (PCB)-impacted soil at Building 735 Area Of Concern (AOC-735) at the former Reynolds Metal Company, LLC (RMC) St. Lawrence Reduction Plant located at 194 County Road 45 in Massena, New York ("Site") (Figure 1). This SIP is applicable only to the AOC-735; material outside of this footprint will be managed under a separate plan.

This SIP is intended to supplement the Notification and Certification submittal to the New York State Department of Environmental Conservation (NYSDEC) and the United States Environmental Protection Agency (USEPA) Regional Coordinator, consistent with the requirements under the Code of Federal Regulations (CFR) Title 40 Part 761.61(a)(3). It is also intended to satisfy the requirement under 40 CFR 761.61(3)(i)(D) to provide a cleanup plan for the Site that describes the approach, disposal technology, and schedule, and provides for contingency measures should unanticipated conditions be encountered during remedial action. This SIP has been prepared to comply with all applicable requirements of 40 CFR Part 761 and applicable PCB remediation waste requirements under 40 CFR Part 761.61 as well as requirements from NYSDEC Title 6 of the New York Codes, Rules and Regulations (NYCRR).

A regulatory overview is provided in Section 1 of this SIP. The Site pre-cleanup characterization overview is provided in Section 2. The PCB cleanup plan, which includes remedial requirements for excavation of soil where PCB concentrations exceed soil cleanup objectives (SCOs), verification sampling procedures, and Site restoration is described in Section 3. Post excavation reporting and recordkeeping are discussed in Section 4.

1.1 Objectives

The objective of this project is to remove PCB-impacted concrete and to remediate, to the extent practicable, PCB-impacted soil to achieve soil cleanup goals at AOC-735 as follows:

- Remove PCB-impacted concrete in excess of 25 milligrams per kilogram (mg/kg) total PCBs.
- Remove soil that exceeds 10 mg/kg total PCBs.
- Segregate materials based on the PCB concentrations above and below 50 mg/kg to facilitate appropriate handling and disposal.
- Conduct verification sampling.
- Restore excavation areas.
- Document the extent of remediation at each location.

1.2 Regulatory Basis and Cleanup Goals

The soil excavation work will be completed in accordance with the self-implementing cleanup provisions of the Toxic Substances Control Act (TSCA), 40 CFR 761.61, and with consideration of NYSDEC Part 375 regulations and the SCOs in the 1992 Record of Decision (ROD).

According to 40 CFR 761.61(a), cleanup levels for porous media (such as concrete) are based on the kind of material and potential exposures to residual PCBs once cleanup is completed. Potential exposures are classified as occurring in either high-occupancy areas or low-occupancy areas. Building 735 is a low-

occupancy area, and a deed restriction will be filed to identify it as low occupancy. In low-occupancy areas, multiple thresholds are listed for porous surfaces (40 CFR 761.61[a][4][iii][1]):

- PCB concentrations ≤ 25 parts per million (ppm) – no additional controls
- PCB concentrations > 25 ppm and ≤ 50 ppm – area secured by a fence and marked with a sign including the M_L Mark
- PCB concentrations > 50 ppm and ≤ 100 ppm if covered with a cap

Where possible, 25 mg/kg (ppm) will be used as the cleanup goal for concrete.

The Site ROD established 10 mg/kg (or parts per million) total PCBs as the historical remediation standard for soil in defined areas, including the AOC-735. This SCO is used to define soil excavation and capping limits, as described in the remediation plan.

Where excavation extents are limited due to the requirement to protect existing infrastructure, soil that remains in-place with greater than 10 mg/kg total PCBs will be graded and capped to provide proper drainage and reduce infiltration and migration of contaminants. The area will be classified as low occupancy in line with 40 CFR 761.61(a)(4)(i)(B)(1).

[1] According to 40 CFR 761.61(a)(4)(iii), the cleanup levels for porous surfaces are consistent with the bulk PCB remediation wastes found in 40 CFR 761.61(a)(4)(i).

2 Pre-Cleanup Site Characterization

2.1 Site Background

The RMC St. Lawrence Reduction Plant began aluminum smelting operations in 1958 and operated continuously until March 31, 2014. The property was formerly owned and operated by Reynolds Metals Company. In 2001, Alcoa purchased the Reynolds Company and at that time Alcoa took responsibility for post-closure activities. Reynolds Metals Company has remained as a wholly owned subsidiary company.

Commencing in 2014 when the plant idled, demolition projects have been undertaken to remove surplus equipment and buildings. Site investigation and remediation activities commenced in the 1980s, and decommissioning and remediation activities are ongoing. Currently, select areas and building are leased by a long-term tenant, and utilities remain at the Site to support the tenant. The layout of the Site operations buildings is shown on Figure 1.

2.2 Building 735 Pin and Channel Building Description

Building 735 is commonly referred to as the Pin Reconditioning and Channel Press. This building formerly housed the pin straightener and the channel press or channel straightener and is located on the northern side of the facility. The pins and channels were used in smelting pots to hold the anode in place during the aluminum reduction process. Hydraulic oil used in support of this equipment was found to contain PCBs in excess of 50 ppm in the late 1970s early 1980s. The facility undertook a PCB removal program that replaced hydraulic oils and later invested in further characterization and remedial actions. Previous remedial work included cleaning of equipment, columns, and floors; removal and replacement of PCB-impacted concrete, and management of porous concrete in accordance with 40 CFR 761.30(p) using a steel decking material. The horizontal limits of AOC-735 is defined as the building footprint with a small area to the north of the building were PCB impacts in soil were identified as shown on Figure 2. The vertical limits for AOC-735 are defined as the bottom of concrete removal and excavation as shown on Figure 3. PCB impacts outside of AOC-735 will be managed under a forthcoming site-wide remediation plan.

2.3 Previous Investigations

Delineation activities were completed between October 2022 and March 2025 in general compliance with 40 CFR 761.61. Investigation activities included sampling concrete and soil to characterize and delineate PCB impacts.

Concrete solid samples were collected by drilling holes at each collection location and collecting the cuttings from the drilling. Enough holes were drilled at each location to obtain the needed material for analysis. Each sampling location was swept to remove the surface dust prior to sampling. New drill bits and sample collection materials were used at each location to limit the possibility of cross contamination.

2.4 Extent of Impacts

2.4.1 Concrete

The extent of impacts in concrete at Building 735 are shown on Figure 2 and summarized in Table 1. Samples were obtained from the top 4-inches of the concrete slab. PCB results varied from less than 10 mg/kg to greater than 50 mg/kg.

Results from samples obtained from 02, 20, and 36 show that PCB concentrations are between 10 mg/kg and 25 mg/kg from the deepest sample collected. Results from samples obtained from 03, 14, 34, 35, 37, 40, 42, and PR-16 show that PCB concentrations are between 25 mg/kg and 50 mg/kg from the deepest sample collected.

Results from samples obtained from locations 06, 16–18, and PR-8 near the former Channel Press area have PCB concentrations greater than 50 mg/kg in the deepest sample collected. Location 735-COL.3A5556-W also has total PCB concentrations greater than 50 mg/kg at the deepest sample interval. PCB concentrations greater than 50 mg/kg are also observed at locations 735-P and 735-COL.3A5556-S, but the concentrations attenuate to less than 1 mg/kg in the deepest concrete interval tested at those locations.

2.4.2 Soil

Soil sampling results for Building 735 are shown on Figure 3 and summarized in Table 2. Most samples were collected from the 0–3-feet (ft) below ground surface depth interval (depth does not include thickness of concrete above sample collected). Samples were collected at depths of up to 6 ft at four locations, B735-BH2, B735-BH18, B735-BH3, and B735-BH5.

As shown on Figure 3, PCB results are less than 10 mg/kg at all locations except B735-BH2, B735-BH18, B735-BH3, and B735-BH5. PCB concentrations are between 10 and 25 mg/kg from the 0–3-ft depth at B735-BH3 and the 0–2-ft depth at B735-BH18; below these depths, PCB concentrations drop below 10 mg/kg.

PCB concentrations at B735-BH2 from 1 to 3 ft and B735-BH5 from 0 to 2 ft exceed 50 mg/kg. Samples were not collected within the footprint of the former Channel Press; therefore, this area, in addition to the area surrounding B735-BH2 and B735-BH5, is assumed to have PCB concentrations greater than 50 mg/kg and will be managed accordingly.

3 PCB Cleanup Plan

The following sections detail the required work that will be conducted as part of the AOC-735 PCB cleanup. The work will be conducted by the Contractor and RMC (Owner) including the designated RMC representative. The Owner may delegate responsibility for some tasks to a representative hired by the Owner for the purposes of the work.

3.1 Additional Site Characterization

No additional site characterization will be conducted prior to commencing soil excavation work. Characterization gaps in soil will be addressed by verification sampling.

3.2 Concrete Removal Limits

The areal extent of planned concrete removal at AOC-735 is shown on Figure 4. Concrete removal will include demolition of the Building 735 superstructure, separation of the concrete slab from the adjacent and remaining buildings to the south, removal of the concrete slab and above grade knee walls, and removal of the sub slab foundation in the area where soil removal is required as shown on Figure 5. All other sub slab concrete foundations will remain in place. The foundations for Buildings 780A and 735B to the north will also remain. The concrete removal work will be completed by the Demolition Contractor and the concrete will be disposed of as described in Section 3.6.

3.3 Soil Removal Limits

The areal extent of planned excavation at AOC-735 is shown on Figure 5. The excavation encompasses the area around the former Channel Press area, where PCBs above 10 mg/kg were measured in soil samples. The depth of excavation will extend to 3 ft below soil surface (bss) based on the available soil data, which show concentrations decline to below 10 mg/kg within 3 ft bgs.

As shown on Figure 3, the excavation limit is bound by characterization soil samples to the northeast, east, and south that meet the SCOs. To the northwest, the excavation will continue up to the foundation of Building 780A. To the west, the excavation extends to the historical extent of impacted concrete.

The excavation will be restored by backfilling with a dense-grade aggregate material (or equivalent) and compacted as described in Section 3.7

3.4 Remedial Activities

Proposed remedial activities include excavating soil, verification sampling, and backfilling with clean fill to match surrounding grades. Anticipated tasks to complete the remediation activities are outlined in this section.

3.4.1 Site Preparation and Pre-Remediation Activities

Site preparation and pre-excavation tasks to be completed will include the following:

- Submit notice to the United States Environmental Protection Agency (USEPA) Regional Administrator, and NYSDEC in accordance with 40 CFR 761.61(a)(3).
- Public and private utility identification, protection, and management.
- Markout waste segregation areas. Soil containing 50 mg/kg PCBs or greater and all concrete will be transported for disposal at a TSCA facility permitted in accordance with 40 CFR 761.45 or a Resource Conservation and Recovery Act (RCRA) Subtitle C landfill. Materials with PCB concentrations less than 50 mg/kg will be disposed of at an approved PCB disposal facility, a permitted municipal solid waste or non-municipal non-hazardous waste facility, or a RCRA-permitted hazardous waste landfill.
- Establish material management areas and procedures for remediation waste, imported fill, and other materials during excavation and backfilling.
- Complete required building demolition and separate the concrete foundations from adjacent buildings and remove the concrete foundations at the AOC-735 excavation area.

3.4.2 Permits and Notifications

This SIP will serve as the 30-day notice to the USEPA Regional Administrator, NYSDEC, and St. Lawrence County in accordance with the PCB self-implementing cleanup requirements under 40 CFR 761.61(a)(3).

No other permits have been identified as needed for this SOW. An erosion and sediment control permit is not required for the remedial activities because most of the work area and surrounding surfaces are concrete paved, and the work areas are less than 1 acre in size. The Contractor is expected, to implement sedimentation and erosion control measures to reduce the potential for excavated soil to migrate from the work areas or enter nearby stormwater conveyances as needed.

3.4.3 Health and Safety Plan

The Contractor will prepare a site-specific HASP for the work that complies with New York Occupational Safety and Health Administration and 29 CFR 1910.120 regulations. The HASP is to be submitted to RMC for review prior to the work and include task-specific Job Safety Analysis and activity hazard analysis; communication plans, evacuation routes, and emergency response procedures; personal protective equipment and safety monitoring requirements; safety data sheets for any materials that will be brought to and used on-site; and other relevant information for the project. A Spill Response Plan should also be incorporated or included as a stand-alone document to support the field activities.

The primary anticipated hazards include potential worker exposure to construction hazards and potential chemical exposure. Worker hazards include those typically found at a construction site using heavy equipment. Potential chemical exposures are anticipated to derive from inhalation of particulates containing PCBs and direct dermal contact with soil containing PCBs. Engineering controls such as the following should be considered by the Contractor to minimize these exposures:

- Use water spray as necessary to dampen excavation surfaces to minimize dust generation.
- Use bench excavations to prevent collapse and protect structural integrity of adjacent buildings and/or infrastructure.
- Conduct continuous air monitoring during active excavation to reliably measure airborne contaminants and to verify that control measures are adequate.
- Establish appropriate work zones, including exclusion zones, contaminant reduction zones, and support zones.

- Wear appropriate personal protective equipment, which will be specified in the HASP.

The Contractor is required to have a copy of their HASP available at the Site during the excavation activities.

3.4.4 Community Air Monitoring Plan

A site-specific CAMP, as required by New York Department of Health or NYSDEC (in accordance with DER-10), was prepared by EHS Support for the work outlined in this remediation plan. The CAMP, provided in the previously submitted Remedial Plan[2], identifies measures and actions to ensure that employees and visitors entering the Site, as well as the public living and working near the Site, are protected from PCB exposure during the remedial activities.

The CAMP will be implemented by a local environmental contractor throughout the remedial work. In general, the CAMP requires particulate air monitoring for particulate matter 10 micrometers and smaller (PM10) using real-time meters (i.e., DustTrak II Aerosol Monitor Model 8530 by TSI, Inc. or equivalent), with data logging capabilities. The device selected will be suitable for detecting airborne particulates at levels below the CAMP particulate action level. Airborne PCB monitoring will also be conducted during intrusive activities comprising low-volume sampling and analysis in accordance with established USEPA methods. The Contractor will be responsible for managing dust from the excavation to meet the action limits of the CAMP.

3.4.5 Subsurface Utilities

The Contractor will be responsible for coordinating with New York 811 one-call to request public utility marking. The Contractor will work with the RMC Representative's representative to locate and confirm the presence or absence of any utilities. The Contractor will obtain dig permits from the RMC representative prior to disturbing the subsurface.

3.4.6 Demarcation of Excavation Limits and Work Zone Establishment

The Contractor will establish a work zone around AOC-735 using temporary fencing or barricades that serve to prevent unauthorized access to the remediation areas. The work zone will serve as an exclusion zone for PCB-impacted soil.

The Contractor will mark the excavation limits in the field with flags, stakes, and paint before commencing excavation. These marks must be maintained throughout the excavation and restoration activities. The final limits of excavation shall be surveyed prior to placement of backfill.

3.4.7 Temporary Support Facilities

The Contractor will establish temporary facilities at the Site for equipment and personnel, including staging area(s), decontamination areas, and ancillary support facilities, such as bathroom and handwashing stations and a field office. The Contractor should also plan for temporary water storage

[2] EHS Support, 2025 Buildings 722a, 722, and 735 PCB Remediation Plan, submitted to NYSDEC and USEPA on June 06, 2025

facilities to support dust suppression activities as needed, as water is available on-site but is not available at every building.

Temporary staging area(s) may be used for the storage of imported backfill, liner materials, and equipment. Temporary facilities for contaminated materials may include roll-off containers, gondolas, or dedicated material management areas. Temporary staging areas used by the Contractor will be coordinated with the RMC Representative.

During Site preparation activities, the Contractor will establish a decontamination area for each building for personnel and equipment that have contact with impacted materials during the excavation activities. The area is primarily expected to be used to wash soil from excavation equipment throughout the excavation implementation. The size of the decontamination area will consider the size of the proposed equipment and measures needed to allow containment of sprayed wash water during decontamination activities. Water that accumulates in the decontamination area will be collected and managed in accordance with the procedures outlined in Section 3.4.14.

3.4.8 Erosion and Sediment Control

The Contractor will implement specific sediment and erosion control measures at each excavation area in accordance with the New York State *Stormwater Management Design Manual*.[3] In general, the Contractor is required to use best management practices to limit the amount of erosion and sediment in surface water runoff.

Excavated soil that requires temporary stockpiling will be placed only in designated staging areas that are designed to prevent contamination of the ground surface. Wherever possible, excavated soil will be directly loaded into trucks for off-site disposal or placed in roll-off containers and covered with tarps. Excavated soil is not to be stockpiled overnight on the ground surface.

The Contractor will be responsible for ensuring that vehicle wheels are free of dirt and mud from the construction activities before they leave the Site. Also, the Contractor will ensure that trucks and roll-off containers are properly covered to minimize the potential for dirt becoming airborne during transportation.

3.4.9 Soil Excavation

The Contractor will be responsible for the following excavation-related activities:

- Excavation of material within identified excavation limits.
- Segregation of wastes based on material type and if the total PCB concentration is (1) equal to or greater than or (2) less than 50 mg/kg.
- Soil removal, management, and loading for off-site disposal. If trucks are unlined dump trucks, the Contractor will be responsible for installing two layers of polyethylene burrito style.

[3] NYSDEC. (2024, July 31). *Stormwater Management Design Manual*. https://extapps.dec.ny.gov/fs/projects/24-25DraftCGPDesignManual/Manual.SW.CGP.2024-07-31.Design_Manual_Issued_2024-07-31.pdf

Soils excavation is anticipated to be completed by mechanical means (machine excavating). Materials removed may be direct-loaded for off-site transport or stockpiled temporarily pending off-site disposal, as directed by the RMC Representative or their designee.

The areal extent of planned excavation at AOC-735 is shown on Figure 5. Estimated quantities are provided in Table 3: Quantity Takeoffs.

3.4.10 Benching and Shoring

Excavations shall be benched, shored, or otherwise stabilized as needed to maintain the structural stability of surrounding ground, buildings, and infrastructure over the course of the work when the excavation is greater than 4 ft in depth (not anticipated to occur).

3.4.11 Soil Stockpiling

Excavated soil may be temporarily stockpiled to facilitate loading and transport off-site for disposal. Soil excavated from locations with concentrations at or above 50 mg/kg PCBs (TSCA waste) must be segregated from soils with concentrations below 50 mg/kg. The location and construction of temporary staging areas for impacted soil will be managed on impervious surfaces and as directed by the RMC Representative or their designee.

3.4.12 Dust Management

The Contractor should maintain damp excavation surfaces and apply additional dust suppressant, as necessary, to prevent or reduce dust emissions resulting from construction activities. Dust suppressant will be potable water applied using a mobile broadcast applicator in a controlled manner. Dust suppressant will be applied when:

- Exposed ground surfaces are dry
- Wind or vehicular traffic cause visible dust generation; or
- Action levels in the HASP or CAMP are exceeded.

3.4.13 Decontamination

All excavation equipment components that encounter PCB-contaminated soil will be cleaned in the designated decontamination area upon leaving the work zone using an all-purpose cleaner and degreaser (e.g., Simple Green All Purpose Cleaner) and power washing with potable water. The Contractor will follow the decontamination procedures for self-implementing cleanup in 40 CFR 761.79(c)(2).

Reusable equipment and tools will be cleaned with using an all-purpose cleaner and degreaser and potable water solution followed by distilled water rinse between uses. The Contractor will employ appropriate waste storage and disposal practices to minimize the volume of water generated and to reduce the amount of sediment in the wash water. Wash water generated will be handled as described in Section 3.4.14.

3.4.14 Water Management

During the course of the work, it is anticipated that the following types of water will be generated: decon water from the decontamination of equipment, and potentially excavation dewatering water and stormwater during a rain event. Excavation at AOC-735 is anticipated to be above the water table.

The Contractor shall collect water as needed to maintain a dry excavation during the work. Appropriate controls shall be installed to minimize the amount of stormwater that enters the excavation by preventing run-on into the excavation.

All water collected from the AOC-735 excavation shall be containerized and solids allowed to settle out. The water shall be decanted, characterized, and discharged in accordance with the Pitch Pump House 722a Basement Water Removal and Pre-Treatment Scope of Work as attached to the previously submitted Remedial Plan and as directed by the RMC Representative into the on-site stormwater system for treatment prior to discharge.

3.5 Cleanup Verification

Soils will be monitored for evidence of PCB impacts over the course of the excavation activities, and verification soil samples will be collected from the walls and floor of excavations where required, to demonstrate soil remedial objectives have been met. When requested, the Contractor shall facilitate verification sampling by collecting soil using the excavator bucket and transferring the soil to a safe location on the ground outside of the excavation; the RMC Representative or designated representative may use this soil to inspect and collect samples for laboratory analysis.

Excavation verification samples will be obtained from the base of each excavation on a 5-ft by 5-ft grid (1.5 meter) in accordance with 40 CFR Part 761 Subpart O. Figure 5 shows the planned verification sampling plan for Building 735. Collected samples will be sent to the laboratory for analysis using EPA SW-846 Method 8082A and extracted using EPA extraction method 3500C/3540C (Soxhlet) or Method 3500C/3550C (Ultrasonic) accordance with 40 CFR Part 761 Subpart O. The grid shown on Figure 5 will be used for sample identification, sample locations will be labelled using the column letter and row number for the grid (i.e. A1, B3, etc.). Duplicate and matrix/matrix-spike duplicate (MS/MSD) samples will be collected at a frequency of 1 per 20 samples in accordance with DER-10.

The verification samples will be used for planning a future site-wide remediation plan for PCBs. AOC-735 is defined by the limit of excavation shown on the drawings, and removal of the material in those limits will represent complete removal of AOC-735.

3.6 Off-site Disposal of PCB remediation wastes

Concrete from the removal of the building foundations and structures, and excavated soil containing PCB concentrations greater than 50 mg/kg will be managed as TSCA hazardous waste and either directly loaded to a lined container or temporarily stockpiled on a concrete pad prior to disposition to a RCRA Section 3004 or 3006 permitted hazardous waste landfill or other TSCA facility permitted in accordance with 40 CFR 761.45. The RMC Representative will select the facility and establish waste profiles before excavation commences.

A Uniform Hazardous Waste Manifest (UHW) will accompany the TSCA hazardous waste, per 40 CFR 761.208, and a signed copy of each UHW will be retained, subject to recordkeeping requirements under 40 CFR 761.209. The RMC Representative (the generator), or their authorized agent, will sign each manifest, and the documentation will be included in the final remedial action report, as described Section 4 and in accordance with 40 CFR Part 761 Subpart K.

Soil and other materials containing less than 50 mg/kg total PCBs will be segregated from TSCA waste, either directly loaded into a waste container or temporarily stockpiled, and disposed of at an approved PCB disposal facility, a permitted municipal solid waste or non-municipal non-hazardous waste facility, or a RCRA-permitted hazardous waste landfill. Manifest documentation will be retained for non-TSCA off-site waste shipments in lieu of a UHW manifest, which is not required. The documentation will be included with the remediation report, as described in Section 4 and in accordance with 40 CFR Part 761 Subpart K.

3.7 Backfilling, Compaction, and Site Restoration

Backfilling excavations will be completed using dense grade aggregate material (or equivalent material). All soil used as excavation backfill will meet the requirements of 6 NYCRR 375-6.7(d) and will be confirmed suitable in accordance with the requirements in Section 5.4 and Appendix 5 of DER-10. Dense-grade aggregate will be imported from a NYSDEC-permitted quarry and is not subject to the imported fill testing requirements of DER-10. Approved equivalent material, such as repurposed crushed concrete with may be used in substitute.

Backfill material shall be placed in a maximum of 12-inch lifts and mechanically compacted with a minimum of three passes with placement machinery. Backfill shall be placed to meet surrounding grade.

3.8 Survey and Documentation of Excavation and Cap Extents

Following excavation completion, the limits of the excavated area will be surveyed by a Professional Land Surveyor licensed in New York State, and a plat map showing the excavation boundaries and excavation grades will be generated.

The survey data will be in New York State Plane coordinates with vertical and horizontal survey tolerances to be maintained in accordance with the project specifications. The plat maps and survey data will be submitted to the RMC Representative in both PDF and electronic formats.

3.9 Contingency Measures

Contingency measures will also be implemented if demolition and excavation cause stability concerns for adjacent structures and necessitate altering the planned excavation extents and/or approach. Contingency measures may include benching excavations or using an appropriate shoring system to stabilize excavations and protect adjacent structures.

Contingency measures will be selected by the RMC Representative and the Contractor on an as-needed basis and will be documented.

4 Post-Excavation Reporting and Recordkeeping

Reporting and recordkeeping will meet the requirements under 40 CFR Part 761. Within 30 days of sending the final shipment of waste off-site, the Cleanup Completion Notification will be submitted to the USEPA Regional Administrator, NYSDEC, and St. Lawrence County in accordance with 40 CFR 761.61(b)(1)(v).

A report will be prepared that documents the characterization work, concrete remediation, soil remediation, verification sampling and analyses, and demobilization activities. Included with the report will be waste manifests, bills of lading, certificates of disposal, laboratory data, cap construction as-builts and survey plats, and any other relevant documentation related to the remediation and waste management. The final report will be certified by a professional engineer licensed in the state of New York. Relevant records will be maintained in accordance with the requirements specified in 40 CFR Part 761 Subpart K. Signed UHW manifests will be retained for at least 3 years (40 CFR 761.214[a][1]). The notification and certification and cleanup records will be retained for a period of 5 years from the date of the final remediation report, consistent with 40 CFR 761.125(c)(5).

A sitewide PCB remediation plan will be prepared in the future and will include provisions for remediation of PCB impacts outside of AOC-735.

Tables

Table 1
Polychlorinated Biphenyl Concentrations in Concrete
Building 735
Reynolds Metal Company St. Lawrence Reduction Plant
Massena, New York

				CAS Number	12674-11-2		11104-28-2		11141-16-5		53469-21-9		12672-29-6		11097-69-1		11096-82-5		37324-23-5		11100-14-4		1336-36-3	
				Chemical Name	PCB-1016		PCB-1221		PCB-1232		PCB-1242		PCB-1248		PCB-1254		PCB-1260		PCB-1262		PCB-1268		Total PCBs	
				Units	(Aroclor 1016) mg/kg		(Aroclor 1221) mg/kg		(Aroclor 1232) mg/kg		(Aroclor 1242) mg/kg		(Aroclor 1248) mg/kg		(Aroclor 1254) mg/kg		(Aroclor 1260) mg/kg		(Aroclor 1262) mg/kg		(Aroclor 1268) mg/kg		mg/kg	
				Total PCB > 1	1		1		1		1		1		1		1		1		1		1	
				Low Occupancy Cleanup Objective	25		25		25		25		25		25		25		25		25		25	
				TSCA Hazardous Waste	≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50	
Location	Figure Location ID	Depth Range	Sample Date	Sample Type (N: Primary, FD: Field Duplicate)	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual
E780CHPRESS02CF	2	0-0.5in	02/19/2010	N	--		--		--		0.221	U	9.993		0.221	U	0.221	U	--		--		9.993	
E780CHPRESS03CF	3	0-0.5in	02/19/2010	N	--		--		--		2.2	U	22.935		9.76		2.2	U	--		--		32.695	
E780CHPRESS06CF	6	0-0.5in	02/19/2010	N	--		--		--		205	U	5663		205	U	205	U	--		--		5663	
E780CHPRESS13CF	13	0-0.5in	02/19/2010	N	--		--		--		0.221	U	4.075		0.221	U	0.221	U	--		--		4.075	
E780CHPRESS14CF	14	0-0.5in	02/19/2010	N	--		--		--		2.112	U	37.83		2.112	U	2.112	U	--		--		37.83	
E780CHPRESS16CF	16	0-0.5in	02/19/2010	N	--		--		--		211	U	3332		211	U	211	U	--		--		3332	
E780CHPRESS17CF	17	0-0.5in	02/19/2010	N	--		--		--		232	U	1532		232	U	232	U	--		--		1532	
E780CHPRESS18CF	18	0-0.5in	02/19/2010	N	--		--		--		216	U	2281		216	U	216	U	--		--		2281	
E780CHPRESS20CF	20	0-0.5in	04/01/2010	N	--		--		--		0.241	U	17.78		0.241	U	0.241	U	--		--		17.78	
E780CHPRESS21CF	21	0-0.5in	04/01/2010	N	--		--		--		0.25	U	2.185		0.25	U	0.25	U	--		--		2.185	
E780CHPRESS22CF	22	0-0.5in	04/01/2010	N	--		--		--		0.245	U	3.127		0.969		0.245	U	--		--		4.096	
E780CHPRESS23CF	23	0-0.5in	04/01/2010	N	--		--		--		0.25	U	6.157		2.207		0.25	U	--		--		8.364	
E780CHPRESS24CF	24	0-0.5in	04/01/2010	N	--		--		--		0.241	U	0.493		0.241	U	0.241	U	--		--		0.4931	
E780CHPRESS25CF	25	0-0.5in	04/01/2010	N	--		--		--		0.243	U	0.243		0.243	U	0.243	U	--		--		0.243	
E780CHPRESS26CF	26	0-0.5in	04/01/2010	N	--		--		--		0.225	U	0.751		0.225	U	0.225	U	--		--		0.751	
E780CHPRESS27CF	27	0-0.5in	04/01/2010	N	--		--		--		0.225	U	1.118		0.225	U	0.225	U	--		--		1.118	
E780CHPRESS28CF	28	0-0.5in	04/01/2010	N	--		--		--		0.226	U	0.344		0.226	U	0.226	U	--		--		0.344	
E780CHPRESS29CF	29	0-0.5in	04/01/2010	N	--		--		--		0.554		0.243	U	0.243	U	0.243	U	--		--		0.554	
E780CHPRESS30CF	30	0-0.5in	04/01/2010	N	--		--		--		0.249	U	0.355		0.249	U	0.249	U	--		--		0.335	
E780CHPRESS31CF	31	0-0.5in	04/01/2010	N	--		--		--		0.223	U	0.308		0.223	U	0.223	U	--		--		0.308	
E780CHPRESS34CF	34	0-0.5in	04/01/2010	N	--		--		--		0.249	U	29.31		8.624		0.249	U	--		--		37.934	
E780CHPRESS35CF	35	0-0.5in	04/01/2010	N	--		--		--		0.23	U	22.09		8.746		0.23	U	--		--		30.836	
E780CHPRESS36CF	36	0-0.5in	04/01/2010	N	--		--		--		0.231	U	14.29		4.361		0.231	U	--		--		18.651	
E780CHPRESS37CF	37	0-0.5in	04/01/2010	N	--		--		--		0.242	U	24.02		6.562		0.242	U	--		--		30.582	
E780CHPRESS40CF	40	0-0.5in	05/06/2010	N	--		--		--		2.03	U	44.49		2.03	U	2.03	U	--		--		44.49	
E780CHPRESS42CF	42	0-0.5in	06/24/2010	N	--		--		--		0.2	U	29.38		0.2	U	0.2	U	--		--		29.38	
E780CHPRESS43CF	43	0-0.5in	06/24/2010	N	--		--		--		0.204	U	3.464		0.204	U	0.204	U	--		--		3.464	
E780CHPRESS44CF	44	0-0.5in	06/24/2010	N	--		--		--		0.2	U	2.012		0.2	U	0.2	U	--		--		2.012	
E780CHPRESS45CF	45	0-0.5in	06/24/2010	N	--		--		--		0.212	U	3.426		0.212	U	0.212	U	--		--		3.426	
E780CHPRESS46CF	46	0-0.5in	06/24/2010	N	--		--		--		0.2	U	3.007		1.157		0.2	U	--		--		4.164	
E780CHPRESS47CF	47	0-0.5in	06/24/2010	N	--		--		--		0.221	U	6.826		0.221	U	0.221	U	--		--		6.826	
E780CHPRESS48CF	48	0-0.5in	06/24/2010	N	--		--		--		0.065	U	4.897		0.065	U	0.065	U	--		--		4.897	
E780CHPRESS49CF	49	0-0.5in	06/24/2010	N	--		--		--		0.215	U	3.229		0.215	U	0.215	U	--		--		3.229	
E735CHPRESSREM01CF	PR-1	0-1in	01/12/2011	N	--		--		--		0.385		0.211	U	0.211	U	0.211	U	--		--		0.385	
E735CHPRESSREM02CF	PR-2	0-1in	01/12/2011	N	--		--		--		0.215	U	0.215	U	0.215	U	0.215	U	--		--		0.215	U
E735CHPRESSREM03CF	PR-3	0-1in	01/12/2011	N	--		--		--		0.203	U	0.621		0.203	U	0.203	U	--		--		0.621	
E735CHPRESSREM04CF	PR-4	0-1in	01/12/2011	N	--		--		--		0.21	U	1.907		0.21	U	0.21	U	--		--		1.907	
E735CHPRESSREM05CF	PR-5	0-1in	01/12/2011	N	--		--		--		0.214	U	0.214	U	0.214	U	0.214	U	--		--		0.214	U
E735CHPRESSREM06CF	PR-6	0-1in	01/12/2011	N	--		--		--		0.21	U	0.937		0.21	U	0.21	U	--		--		0.937	

Table 1
Polychlorinated Biphenyl Concentrations in Concrete
Building 735
Reynolds Metal Company St. Lawrence Reduction Plant
Massena, New York

				CAS Number	12674-11-2		11104-28-2		11141-16-5		53469-21-9		12672-29-6		11097-69-1		11096-82-5		37324-23-5		11100-14-4		1336-36-3	
				Chemical Name	PCB-1016		PCB-1221		PCB-1232		PCB-1242		PCB-1248		PCB-1254		PCB-1260		PCB-1262		PCB-1268		Total PCBs	
				Units	(Aroclor 1016) mg/kg		(Aroclor 1221) mg/kg		(Aroclor 1232) mg/kg		(Aroclor 1242) mg/kg		(Aroclor 1248) mg/kg		(Aroclor 1254) mg/kg		(Aroclor 1260) mg/kg		(Aroclor 1262) mg/kg		(Aroclor 1268) mg/kg		mg/kg	
				Total PCB > 1	1		1		1		1		1		1		1		1		1		1	
				Low Occupancy Cleanup Objective	25		25		25		25		25		25		25		25		25		25	
				TSCA Hazardous Waste	≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50	
Location	Figure Location ID	Depth Range	Sample Date	Sample Type (N: Primary, FD: Field Duplicate)	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual
E735CHPRESSREM07CF	PR-7	0-1in	01/12/2011	N	--		--		--		0.222	U	0.222	U	0.222	U	0.222	U	--		--		0.222	U
E735CHPRESSREM08CF	PR-8	0-3in	01/12/2011	N	--		--		--		7.04		0.198	U	0.198	U	2.09	U	--		--		7.04	
E735CHPRESSREM09CF	PR-9	0-1in	01/12/2011	N	--		--		--		0.202	U	0.206		0.202	U	0.202	U	--		--		0.206	
E735CHPRESSREM10CF	PR-10	0-1in	01/12/2011	N	--		--		--		0.205	U	0.205	U	0.205	U	0.205	U	--		--		0.205	U
E735CHPRESSREM11CF	PR-11	0-1in	01/12/2011	N	--		--		--		0.198	U	0.198	U	0.198	U	0.198	U	--		--		0.198	U
E735CHPRESSREM12CF	PR-12	0-3in	01/12/2011	N	--		--		--		0.2	U	1.42		0.269		0.2	U	--		--		1.689	
E735CHPRESSREM13CF	PR-13	0-1in	01/12/2011	N	--		--		--		0.196	U	0.588		0.196	U	0.196	U	--		--		0.588	
E735CHPRESSREM14CF	PR-14	0-1in	01/12/2011	N	--		--		--		0.202	U	0.315		0.202	U	0.202	U	--		--		0.315	
E735CHPRESSREM15CF	PR-15	0-1in	01/12/2011	N	--		--		--		0.203	U	0.58		0.203	U	0.203	U	--		--		0.58	
E735CHPRESSREM16CF	PR-16	0-2in	01/12/2011	N	--		--		--		0.226	U	25.058		4.725		0.226	U	--		--		29.783	
E735CHPRESSREM17CF	PR-17	0-1in	01/12/2011	N	--		--		--		0.225	U	0.654		0.225	U	0.225	U	--		--		0.654	
E735CHPRESSREM18CF	PR-18	0-1in	01/12/2011	N	--		--		--		0.219	U	0.219	U	0.219	U	0.219	U	--		--		0.219	U
E735CHPRESSREM19CF	PR-8	0-3in	01/12/2011	N	--		--		--		2.28		0.215	U	0.215	U	0.215	U	--		--		2.28	
E735CHPRESSREM20CF	PR-12	0-3in	01/12/2011	N	--		--		--		0.22	U	0.513		0.22	U	0.22	U	--		--		0.513	
E735CHPRESSREM21CF	PR-8	0-4in	01/17/2011	N	--		--		--		0.2	U	94.443		0.2	U	0.2	U	--		--		94.443	
E735CHPRESSREM22CF	PR-16	0-3in	01/17/2011	N	--		--		--		0.205	U	0.205	U	0.205	U	0.205	U	--		--		0.205	U
735-COL.3A5556	735-COL.3A5556	0-0.08ft	09/29/2022	N	1.3	U	1.5	U	1.1	U	0.97	U	18		1.1	U	1.8	J	1.1	U	0.82	U	19.8	
735-COL.3A5556	735-COL.3A5556	0.08-0.17ft	09/29/2022	N	0.48	U	0.57	U	0.4	U	0.36	U	21		0.4	U	2.7		0.42	U	0.31	U	23.7	
735-COL.3A5556	735-COL.3A5556	0.17-0.25ft	09/29/2022	N	0.52	U	0.62	U	0.43	U	0.39	U	23		0.43	U	2.9		0.46	U	0.33	U	25.9	
735-COL.3A5556	735-COL.3A5556	0.25-0.33ft	09/29/2022	N	0.12	U	0.14	U	0.1	U	0.091	U	3		0.1	U	0.37		0.11	U	0.077	U	3.37	
735-COL.4E5556	735-COL.4E5556	0-0.08ft	09/30/2022	N	0.025	U	0.03	U	0.021	U	0.019	U	0.076		0.021	U	0.021	U	0.022	U	0.016	U	0.076	
735-COL.4E5556	735-COL.4E5556	0.08-0.17ft	09/30/2022	N	0.026	U	0.031	U	0.022	U	0.02	U	0.024	J	0.022	U	0.022	U	0.023	U	0.017	U	0.024	
735-COL.4C5556	735-COL.4C5556	0-0.08ft	09/30/2022	N	0.25	U	0.3	U	0.21	U	0.19	U	10		0.21	U	0.21	U	0.22	U	0.16	U	10	
735-COL.4C5556	735-COL.4C5556	0.08-0.17ft	09/30/2022	N	0.026	U	0.031	U	0.022	U	0.54		0.017	U	0.022	U	0.022	U	0.023	U	0.016	U	0.54	
735-COL.4C5556	735-COL.4C5556	0-0.08ft	09/30/2022	FD	0.25	U	0.3	U	0.21	U	0.19	U	4.1		0.21	U	0.29	J	0.22	U	0.16	U	4.39	
735-COL.5C5556	735-COL.5C5556	0-0.08ft	09/30/2022	N	0.026	U	0.031	U	0.021	U	0.12	p	0.017	U	0.021	U	0.021	U	0.022	U	0.016	U	0.12	
735-COL.5C5556	735-COL.5C5556	0.08-0.17ft	09/30/2022	N	0.025	U	0.029	U	0.021	U	0.019	U	0.017	U	0.021	U	0.021	U	0.022	U	0.016	U	0.029	U
735-COL.6E5556	735-COL.6E5556	0-0.08ft	10/04/2022	FD	0.025	U	0.03	U	0.021	U	0.019	U	0.67		0.021	U	0.021	U	0.022	U	0.016	U	0.67	
735-COL.6E5556	735-COL.6E5556	0-0.08ft	10/04/2022	N	0.024	U	0.029	U	0.02	U	0.018	U	0.069		0.02	U	0.02	U	0.021	U	0.015	U	0.069	
735-COL.6E5556	735-COL.6E5556	0.08-0.17ft	10/04/2022	N	0.026	U	0.031	U	0.022	U	0.02	U	0.029	J	0.022	U	0.022	U	0.023	U	0.017	U	0.029	
735-COL.6CD5556	735-COL.6CD5556	0-0.08ft	10/04/2022	N	0.025	U	0.029	U	0.021	U	0.019	U	0.017	U	0.021	U	0.021	U	0.022	U	0.016	U	0.029	U
735-COL.6CD5556	735-COL.6CD5556	0.08-0.17ft	10/04/2022	N	0.026	U	0.031	U	0.022	U	0.02	U	0.018	U	0.022	U	0.022	U	0.023	U	0.017	U	0.031	U
735-COL.6B5556	735-COL.6B5556	0-0.08ft	10/04/2022	N	0.26	U	0.31	U	0.22	U	0.2	U	2.9		0.22	U	0.23	J	0.23	U	0.17	U	3.13	
735-COL.6B5556	735-COL.6B5556	0.08-0.17ft	10/04/2022	N	0.024	U	0.029	U	0.02	U	0.57		0.016	U	0.02	U	0.02	U	0.021	U	0.015	U	0.57	
735-COL.7F5556	735-COL.7F5556	0-0.08ft	10/04/2022	N	0.13	U	0.16	U	0.11	U	0.099	U	1.5		0.11	U	0.14	J	0.11	U	0.083	U	1.64	
735-COL.7F5556	735-COL.7F5556	0.08-0.17ft	10/04/2022	N	0.026	U	0.031	U	0.022	U	0.02	U	0.094		0.022	U	0.022	U	0.023	U	0.017	U	0.094	
735-P	735-P	0.08-0.17ft	10/07/2022	N	0.25	U	0.3	U	0.21	U	0.19	U	2		0.21	U	0.21	U	0.22	U	0.16	U	2	
735-P	735-P	0.17-0.25ft	10/07/2022	N	0.026	U	0.031	U	0.022	U	0.34		0.018	U	0.022	U	0.042	J	0.023	U	0.017	U	0.382	
735-P	735-P	0.25-0.33ft	10/07/2022	N	0.026	U	0.031	U	0.022	U	0.02	U	0.067		0.022	U	0.022	U	0.023	U	0.017	U	0.067	

Table 1
Polychlorinated Biphenyl Concentrations in Concrete
Building 735
Reynolds Metal Company St. Lawrence Reduction Plant
Massena, New York

				CAS Number	12674-11-2	11104-28-2	11141-16-5	53469-21-9	12672-29-6	11097-69-1	11096-82-5	37324-23-5	11100-14-4	1336-36-3
				Chemical Name	PCB-1016 (Aroclor 1016)	PCB-1221 (Aroclor 1221)	PCB-1232 (Aroclor 1232)	PCB-1242 (Aroclor 1242)	PCB-1248 (Aroclor 1248)	PCB-1254 (Aroclor 1254)	PCB-1260 (Aroclor 1260)	PCB-1262 (Aroclor 1262)	PCB-1268 (Aroclor 1268)	Total PCBs
				Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
				Total PCB > 1	1	1	1	1	1	1	1	1	1	1
				Low Occupancy Cleanup Objective	25	25	25	25	25	25	25	25	25	25
				TSCA Hazardous Waste	≥50	≥50	≥50	≥50	≥50	≥50	≥50	≥50	≥50	≥50
Location	Figure Location ID	Depth Range	Sample Date	Sample Type (N: Primary, FD: Field Duplicate)	Result Qual	Result Qual	Result Qual	Result Qual	Result Qual	Result Qual	Result Qual	Result Qual	Result Qual	Result Qual
735-P	735-P	0-0.08ft	10/07/2022	N	5.2 U	6.3 U	4.4 U	4 U	94	4.4 U	27	4.6 U	3.3 U	121
735-C.E	735-C.E	0.08-0.17ft	10/07/2022	N	0.026 U	0.031 U	0.022 U	0.02 U	0.017 U	0.022 U	0.022 U	0.023 U	0.016 U	0.031 U
735-C.E	735-C.E	0-0.08ft	10/07/2022	N	0.025 U	0.03 U	0.021 U	0.019 U	0.06	0.021 U	0.021 U	0.022 U	0.016 U	0.06
735-C.S	735-C.S	0.08-0.17ft	10/07/2022	N	0.025 U	0.03 U	0.021 U	0.019 U	0.047 J	0.021 U	0.021 U	0.022 U	0.016 U	0.047
735-C.S	735-C.S	0-0.08ft	10/07/2022	N	0.026 U	0.031 U	0.022 U	0.02 U	0.039 J	0.022 U	0.022 U	0.023 U	0.017 U	0.039
735-P-E	735-P-E	0-0.08ft	05/04/2023	N	1.1 UF1	1.1 U	1.1 U	1.1 U	19	1.1 U	2 F1	1.1 U	1.1 U	21
735-P-E	735-P-E	0-0.08ft	05/04/2023	FD	1.1 U	1.1 U	1.1 U	1.1 U	19	1.1 U	1.8	1.1 U	1.1 U	20.8
735-P-E	735-P-E	0.08-0.17ft	05/04/2023	N	0.26 U	0.26 U	0.26 U	0.26 U	2.6	0.26 U	0.15 J	0.26 U	0.26 U	2.75
735-P-E	735-P-E	0.17-0.25ft	05/04/2023	N	0.054 U	0.054 U	0.054 U	0.33	0.054 U	0.054 U	0.054 U	0.054 U	0.054 U	0.33
735-P-E	735-P-E	0.25-0.33ft	05/04/2023	N	0.051 U	0.051 U	0.051 U	0.12	0.051 U	0.051 U	0.051 U	0.051 U	0.051 U	0.12
735-P-N	735-P-N	0-0.08ft	05/04/2023	N	0.05 UF2	0.05 U	0.05 U	0.05 U	0.17	0.05 U	0.05 UF2	0.05 U	0.05 U	0.17
735-P-N	735-P-N	0-0.08ft	05/04/2023	FD	0.05 U	0.05 U	0.05 U	0.05 U	0.16	0.05 U	0.05 U	0.05 U	0.05 U	0.16
735-P-N	735-P-N	0.08-0.17ft	05/04/2023	N	0.055 U	0.055 U	0.055 U	0.055 U	0.027 J	0.055 U	0.055 U	0.055 U	0.055 U	0.027
735-P-N	735-P-N	0.17-0.25ft	05/04/2023	N	0.055 U	0.055 U	0.055 U	0.055 U	0.055 U	0.055 U	0.055 U	0.055 U	0.055 U	0.055 U
735-P-N	735-P-N	0.25-0.33ft	05/04/2023	N	0.053 U	0.053 U	0.053 U	0.053 U	0.053 U	0.053 U	0.053 U	0.053 U	0.053 U	0.053 U
735-COL.3A5556-S	735-COL.3A5556-S	0-0.08ft	05/04/2023	N	5.1 U	5.1 U	5.1 U	5.1 U	73	5.1 U	7.2	5.1 U	5.1 U	80.2
735-COL.3A5556-S	735-COL.3A5556-S	0.08-0.17ft	05/04/2023	N	1.1 U	1.1 U	1.1 U	1.1 U	21	1.1 U	2	1.1 U	1.1 U	23
735-COL.3A5556-S	735-COL.3A5556-S	0.17-0.25ft	05/04/2023	N	0.27 U	0.27 U	0.27 U	0.27 U	3.4	0.27 U	0.3	0.27 U	0.27 U	3.7
735-COL.3A5556-S	735-COL.3A5556-S	0.25-0.33ft	05/04/2023	N	0.054 U	0.054 U	0.054 U	0.054 U	0.67	0.054 U	0.059	0.054 U	0.054 U	0.729
735-COL.3A5556-N	735-COL.3A5556-N	0-0.08ft	05/04/2023	N	1.1 U	1.1 U	1.1 U	1.1 U	16	1.1 U	2.2	1.1 U	1.1 U	18.2
735-COL.3A5556-N	735-COL.3A5556-N	0.08-0.17ft	05/04/2023	N	0.54 U	0.54 U	0.54 U	0.54 U	7.7	0.54 U	0.82	0.54 U	0.54 U	8.52
735-COL.3A5556-N	735-COL.3A5556-N	0.17-0.25ft	05/04/2023	N	0.053 U	0.053 U	0.053 U	0.053 U	0.82	0.053 U	0.044 J	0.053 U	0.053 U	0.864
735-COL.3A5556-N	735-COL.3A5556-N	0.25-0.33ft	05/04/2023	N	0.054 U	0.054 U	0.054 U	0.054 U	0.26	0.054 U	0.054 U	0.054 U	0.054 U	0.26
735-COL.3A5556-W	735-COL.3A5556-W	0-0.08ft	05/04/2023	N	54 U	54 U	54 U	54 U	970	54 U	80	54 U	54 U	1050
735-COL.3A5556-W	735-COL.3A5556-W	0.08-0.17ft	05/04/2023	N	50 U	50 U	50 U	50 U	840	50 U	57	50 U	50 U	897
735-COL.3A5556-W	735-COL.3A5556-W	0.17-0.25ft	05/04/2023	N	25 U	25 U	25 U	660	25 U	25 U	25 U	25 U	25 U	660
735-COL.3A5556-W	735-COL.3A5556-W	0.25-0.33ft	05/04/2023	N	53 U	53 U	53 U	670	53 U	53 U	52 J	53 U	53 U	722
735-P-W	735-P-W	0-0.08ft	08/16/2023	N	0.056 U	0.056 U	0.056 U	0.056 U	0.2	0.056 U	0.056 U	0.056 U	0.056 U	0.2
735-P-W	735-P-W	0.08-0.17ft	08/16/2023	N	0.051 U	0.051 U	0.051 U	0.051 U	0.021 J	0.051 U	0.051 U	0.051 U	0.051 U	0.021

Notes:
-- = not analyzed
> = greater than
PCB = polychlorinated biphenyl
Total Detected PCBs = sum of all detections and reporting limit for non-detect results
TSCA = Toxic Substance Control Act

Table 1
Polychlorinated Biphenyl Concentrations in Concrete
Building 735
Reynolds Metal Company St. Lawrence Reduction Plant
Massena, New York

				CAS Number	12674-11-2		11104-28-2		11141-16-5		53469-21-9		12672-29-6		11097-69-1		11096-82-5		37324-23-5		11100-14-4		1336-36-3	
				Chemical Name	PCB-1016 (Aroclor 1016)		PCB-1221 (Aroclor 1221)		PCB-1232 (Aroclor 1232)		PCB-1242 (Aroclor 1242)		PCB-1248 (Aroclor 1248)		PCB-1254 (Aroclor 1254)		PCB-1260 (Aroclor 1260)		PCB-1262 (Aroclor 1262)		PCB-1268 (Aroclor 1268)		Total PCBs	
				Units	mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg	
				Total PCB > 1	1		1		1		1		1		1		1		1		1		1	
				Low Occupancy Cleanup Objective	25		25		25		25		25		25		25		25		25		25	
				TSCA Hazardous Waste	≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50	
Location	Figure Location ID	Depth Range	Sample Date	Sample Type (N: Primary, FD: Field Duplicate)	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual

Qualifier:
J = concentration is estimated
U = non-detect

Units:
in = inch
ft = feet
mg/kg = milligram per kilogram

Table 2
Polychlorinated Biphenyl Concentrations in Soil
Building 735
Reynolds Metal Company St. Lawrence Reduction Plant
Massena, New York

			CAS Number	12674-11-2		11104-28-2		11141-16-5		53469-21-9		12672-29-6		11097-69-1		11096-82-5		37324-23-5		11100-14-4		1336-36-3	
			Chemical Name	PCB-1016 (Aroclor 1016)		PCB-1221 (Aroclor 1221)		PCB-1232 (Aroclor 1232)		PCB-1242 (Aroclor 1242)		PCB-1248 (Aroclor 1248)		PCB-1254 (Aroclor 1254)		PCB-1260 (Aroclor 1260)		PCB-1262 (Aroclor 1262)		PCB-1268 (Aroclor 1268)		Total PCBs	
			Preparation Method	3546		3546		3546		3546		3546		3546		3546		3546		3546			
			Analytic Method	8082A		8082A		8082A		8082A		8082A		8082A		8082A		8082A		8082A		CALC	
			Units	mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg	
			Total PCB > 1	1		1		1		1		1		1		1		1		1		1	
			Site-Specific Soil Cleanup Objective	10		10		10		10		10		10		10		10		10		10	
			TSCA Hazardous Waste	≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50	
Location	Sample Depth (ft)	Sample Date	Sample Type (N: Primary, FD: Field Duplicate)	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual
735-P	1.08-1.58	10/07/2022	FD	0.025	U	0.03	U	0.021	U	0.019	U	0.017	U	0.021	U	0.021	U	0.022	U	0.016	U	0.03	U
735-P	1.08-1.58	10/07/2022	N	0.027	U	0.032	U	0.022	U	0.02	U	0.018	U	0.022	U	0.022	U	0.023	U	0.017	U	0.032	U
735-P	1.58-2.08	10/07/2022	N	0.026	U	0.031	U	0.021	U	0.019	U	0.017	U	0.021	U	0.021	U	0.022	U	0.016	U	0.031	U
735-C.E	0.66-1.16	10/07/2022	N	0.14	U	0.17	U	0.12	U	3.2		0.097	U	0.12	U	0.12	U	0.13	U	0.091	U	3.2	
735-C.E	1.16-1.66	10/07/2022	N	0.026	U	0.031	U	0.022	U	0.14		0.017	U	0.022	U	0.022	U	0.023	U	0.016	U	0.14	
735-C.S	1-1.5	10/07/2022	N	0.28	U	0.34	U	0.24	U	2.2		0.19	U	0.24	U	0.24	U	0.25	U	0.18	U	2.2	
735-C.S	1.5-2	10/07/2022	N	0.026	U	0.031	U	0.022	U	0.17		0.018	U	0.022	U	0.022	U	0.023	U	0.017	U	0.17	
B735-BH11	0-1	12/09/2024	N	0.00478	U	0.0054	U	0.0114	U	0.00726	U	0.672		0.295		0.139		--		--		1.106	
B735-BH11	1-2	12/09/2024	N	0.00475	U	0.00536	U	0.0113	U	0.00721	U	0.968		0.454		0.236		--		--		1.658	
B735-BH11	2-3	12/09/2024	N	0.023	U	0.0259	U	0.0549	U	0.0349	U	2.75		1.87		1.23		--		--		5.85	
B735-BH11	2-3	12/09/2024	FD	0.0233	U	0.0263	U	0.0556	U	0.0353	U	2.62		1.74		1.27		--		--		5.63	
B735-BH13	0-1	12/09/2024	N	0.00455	U	0.00513	U	0.0109	U	0.00691	U	0.686		0.319		0.134		--		--		1.139	
B735-BH13	1-2	12/09/2024	N	0.0214	U	0.0241	U	0.051	U	0.0324	U	1.77		1.01		0.653		--		--		3.433	
B735-BH13	2-3	12/09/2024	N	0.0234	U	0.0264	U	0.0558	U	0.0355	U	2.16		1.32		0.845		--		--		4.325	
B735-BH18	0-1	12/09/2024	N	0.094	U	0.106	U	0.224	U	0.143	U	14.8		0.116	U	0.196	U	--		--		14.8	
B735-BH18	1-2	12/09/2024	N	0.0942	U	0.106	U	0.225	U	0.143	U	21.7		0.116	U	0.196	U	--		--		21.7	
B735-BH18	2-3	12/09/2024	N	0.0046	U	0.00519	U	0.011	U	0.00698	U	0.49		0.00567	U	0.00958	U	--		--		0.49	
B735-BH18	5-6	12/09/2024	N	0.0234	U	0.0264	U	0.056	U	0.0356	U	2.7		0.0289	U	0.0488	U	--		--		2.7	
B735-BH3	0-1	12/09/2024	N	0.112	U	0.126	U	0.268	U	0.17	U	7.54		7.74		2.03		--		--		17.31	
B735-BH3	1-2	12/09/2024	N	0.472	U	0.533	U	1.13	U	0.717	U	7.57		11.9		3.36	J	--		--		22.83	
B735-BH3	2-3	12/09/2024	N	0.468	U	0.528	U	1.12	U	0.711	U	23.2		0.577	U	0.974	U	--		--		23.2	
B735-BH3	3-4	12/09/2024	N	0.0906	U	0.102	U	0.216	U	0.138	U	6.36		0.112	U	0.189	U	--		--		6.36	
B735-BH3	4-5	12/09/2024	N	0.00462	U	0.00521	U	0.011	U	0.00701	U	0.277		0.0764		0.014	JIP	--		--		0.3674	
B735-BH5	0-1	12/09/2024	N	2.71	U	3.06	U	6.48	U	4.12	U	180		3.34	U	31.2		--		--		211.2	
B735-BH5	1-2	12/09/2024	N	2.29	U	2.58	U	5.46	U	3.48	U	132		2.82	U	20.4	J	--		--		152.4	
B735-BH5	2-3	12/09/2024	N	0.45	U	0.508	U	1.07	U	0.683	U	25.6		0.554	U	0.936	U	--		--		25.6	
B735-BH5	3-4	12/09/2024	N	0.0246	U	0.0277	U	0.0587	U	0.0373	U	3.48		0.0303	U	0.0512	U	--		--		3.48	
B735-BH5	4-5	12/09/2024	N	0.00469	U	0.00529	U	0.0112	U	0.00712	U	0.481		0.00578	U	0.00976	U	--		--		0.481	
B735-BH7	0-1	12/09/2024	N	0.0053	U	0.00599	U	0.0127	U	0.00805	U	0.274		0.238		0.094		--		--		0.606	
B735-BH7	1-2	12/09/2024	N	0.00429	U	0.00484	U	0.0102	U	0.00651	U	0.182		0.00528	U	0.00892	U	--		--		0.182	
B735-BH7	2-3	12/09/2024	N	0.0044	U	0.00496	U	0.0105	U	0.00667	U	0.129		0.00541	U	0.00915	U	--		--		0.129	
B735-BH9	0-1	12/09/2024	N	0.00481	U	0.00543	U	0.0115	U	0.0073	U	1.12		0.754		0.588		--		--		2.462	
B735-BH9	1-2	12/09/2024	N	0.0236	U	0.0266	U	0.0562	U	0.0358	U	2.43		1.41		1.03		--		--		4.87	
B735-BH9	2-3	12/09/2024	N	0.00428	U	0.00483	U	0.0102	U	0.0065	U	0.356		0.14		0.0398	J	--		--		0.5358	

Table 2
Polychlorinated Biphenyl Concentrations in Soil
Building 735
Reynolds Metal Company St. Lawrence Reduction Plant
Massena, New York

			CAS Number	12674-11-2		11104-28-2		11141-16-5		53469-21-9		12672-29-6		11097-69-1		11096-82-5		37324-23-5		11100-14-4		1336-36-3	
			Chemical Name	PCB-1016 (Aroclor 1016)		PCB-1221 (Aroclor 1221)		PCB-1232 (Aroclor 1232)		PCB-1242 (Aroclor 1242)		PCB-1248 (Aroclor 1248)		PCB-1254 (Aroclor 1254)		PCB-1260 (Aroclor 1260)		PCB-1262 (Aroclor 1262)		PCB-1268 (Aroclor 1268)		Total PCBs	
			Preparation Method	3546		3546		3546		3546		3546		3546		3546		3546		3546			
			Analytic Method	8082A		8082A		8082A		8082A		8082A		8082A		8082A		8082A		8082A		CALC	
			Units	mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg	
			Total PCB > 1	1		1		1		1		1		1		1		1		1		1	
			Site-Specific Soil Cleanup Objective	10		10		10		10		10		10		10		10		10		10	
			TSCA Hazardous Waste	≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50	
Location	Sample Depth (ft)	Sample Date	Sample Type (N: Primary, FD: Field Duplicate)	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual
B735-BH15	0-1	12/10/2024	N	0.00453	U	0.00511	U	0.0108	U	0.00688	U	0.142		0.00558	U	0.00943	U	--		--		0.142	
B735-BH15	1-2	12/10/2024	N	0.00413	U	0.00466	U	0.00985	U	0.00626	U	0.0342	J	0.00508	U	0.00859	U	--		--		0.0342	
B735-BH15	2-3	12/10/2024	N	0.00439	U	0.00495	U	0.0105	U	0.00666	U	0.00741	U	0.00541	U	0.00913	U	--		--		0.00913	U
B735-BH2	0-1	12/17/2024	N	0.104	U	0.117	U	0.248	U	11.4		0.176	U	0.128	U	0.216	U	--		--		11.4	
B735-BH2	1-2	12/17/2024	N	2.32	U	2.62	U	5.55	U	3.53	U	413		2.86	U	4.84	U	--		--		413	
B735-BH2	2-3	12/17/2024	N	0.457	U	0.516	U	1.09	U	74.5		0.772	U	0.563	U	0.951	U	--		--		74.5	
B735-BH1	0-1	12/18/2024	N	0.00448	U	0.00506	U	0.0107	U	0.0068	U	0.118		0.00552	U	0.00933	U	--		--		0.118	
B735-BH1	1-2	12/18/2024	N	0.00438	U	0.00494	U	0.0104	U	0.00664	U	0.0992		0.00539	U	0.0091	U	--		--		0.0992	
B735-BH1	2-3	12/18/2024	N	0.00436	U	0.00492	U	0.0104	U	0.00661	U	0.175		0.00537	U	0.00907	U	--		--		0.175	
B735-BH10	0-1	12/18/2024	N	0.0044	U	0.00496	U	0.0105	U	0.0923		0.00743	U	0.00542	U	0.00916	U	--		--		0.0923	
B735-BH10	1-2	12/18/2024	N	0.00425	U	0.0048	U	0.0102	U	0.013	J	0.00718	U	0.00524	U	0.00885	U	--		--		0.013	
B735-BH10	1-2	12/18/2024	FD	0.0042	U	0.00474	U	0.01	U	0.0161	J	0.00709	U	0.00517	U	0.00873	U	--		--		0.0161	
B735-BH10	2-3	12/18/2024	N	0.00444	U	0.00501	U	0.0106	U	0.0148	J	0.0075	U	0.00547	U	0.00923	U	--		--		0.0148	
B735-BH12	0-1	12/18/2024	N	0.00445	U	0.00502	U	0.0106	U	0.00713	J	0.00751	U	0.00548	U	0.00925	U	--		--		0.00713	
B735-BH12	1-2	12/18/2024	N	0.00439	U	0.00496	U	0.0105	U	0.00667	U	0.00742	U	0.00541	U	0.00914	U	--		--		0.00914	U
B735-BH12	2-3	12/18/2024	N	0.00413	U	0.00466	U	0.00986	U	0.00627	U	0.00698	U	0.00509	U	0.00859	U	--		--		0.00986	U
B735-BH14	0-1	12/18/2024	N	0.00445	U	0.00503	U	0.0106	U	0.00676	U	0.00752	U	0.00549	U	0.00927	U	--		--		0.00927	U
B735-BH14	1-2	12/18/2024	N	0.00412	U	0.00464	U	0.00982	U	0.00625	U	0.00695	U	0.00507	U	0.00856	U	--		--		0.00982	U
B735-BH14	2-3	12/18/2024	N	0.00426	U	0.0048	U	0.0102	U	0.00646	U	0.00719	U	0.00524	U	0.00886	U	--		--		0.00886	U
B735-BH16	0-1	12/18/2024	N	0.025	U	0.0283	U	0.0598	U	0.038	U	2.39		1.43		1.26		--		--		5.08	
B735-BH16	1-2	12/18/2024	N	0.0235	U	0.0265	U	0.0561	U	0.0357	U	2.17		1.22		1.08		--		--		4.47	
B735-BH16	2-3	12/18/2024	N	0.0235	U	0.0265	U	0.0561	U	0.0357	U	3.26		1.62		1.18		--		--		6.06	
B735-BH19	0-1	12/18/2024	N	0.00444	U	0.005	U	0.0106	U	0.00673	U	0.0917		0.00546	U	0.00923	U	--		--		0.0917	
B735-BH19	1-2	12/18/2024	N	0.00428	U	0.00483	U	0.0102	U	0.0065	U	0.0226	J	0.00969	J	0.00891	U	--		--		0.03229	
B735-BH19	2-3	12/18/2024	N	0.0045	U	0.00508	U	0.0107	U	0.00683	U	0.0076	U	0.00554	U	0.00936	U	--		--		0.00936	U
B735-BH4	0-1	12/18/2024	N	0.00449	U	0.00507	U	0.0107	U	0.275		0.00759	U	0.00554	U	0.00935	U	--		--		0.275	
B735-BH4	1-2	12/18/2024	N	0.00437	U	0.00493	U	0.0104	U	0.0196	J	0.00738	U	0.00538	U	0.00909	U	--		--		0.0196	
B735-BH4	2-3	12/18/2024	N	0.00437	U	0.00493	U	0.0104	U	0.00871	J	0.00738	U	0.00538	U	0.00909	U	--		--		0.00871	
B735-BH6	0-1	12/18/2024	N	0.00441	U	0.00498	U	0.0105	U	0.68		0.00745	U	0.00544	U	0.00918	U	--		--		0.68	
B735-BH6	1-2	12/18/2024	N	0.00434	U	0.00489	U	0.0104	U	0.091		0.00733	U	0.00534	U	0.00903	U	--		--		0.091	
B735-BH6	2-3	12/18/2024	N	0.00422	U	0.00476	U	0.0101	U	0.0823		0.00713	U	0.0052	U	0.00878	U	--		--		0.0823	
B735-BH8	0-1	12/18/2024	N	0.00455	U	0.00514	U	0.0109	U	0.0313	J	0.00769	U	0.00561	U	0.00947	U	--		--		0.0313	
B735-BH8	1-2	12/18/2024	N	0.00409	U	0.00462	U	0.00977	U	0.00621	U	0.00691	U	0.00504	U	0.00852	U	--		--		0.00977	U
B735-BH8	2-3	12/18/2024	N	0.00427	U	0.00482	U	0.0102	U	0.00648	U	0.00722	U	0.00526	U	0.00889	U	--		--		0.00889	U

Table 2
Polychlorinated Biphenyl Concentrations in Soil
Building 735
Reynolds Metal Company St. Lawrence Reduction Plant
Massena, New York

			CAS Number	12674-11-2		11104-28-2		11141-16-5		53469-21-9		12672-29-6		11097-69-1		11096-82-5		37324-23-5		11100-14-4		1336-36-3	
			Chemical Name	PCB-1016 (Aroclor 1016)		PCB-1221 (Aroclor 1221)		PCB-1232 (Aroclor 1232)		PCB-1242 (Aroclor 1242)		PCB-1248 (Aroclor 1248)		PCB-1254 (Aroclor 1254)		PCB-1260 (Aroclor 1260)		PCB-1262 (Aroclor 1262)		PCB-1268 (Aroclor 1268)		Total PCBs	
			Preparation Method	3546		3546		3546		3546		3546		3546		3546		3546		3546			
			Analytic Method	8082A		8082A		8082A		8082A		8082A		8082A		8082A		8082A		8082A		CALC	
			Units	mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg	
			Total PCB > 1	1		1		1		1		1		1		1		1		1		1	
			Site-Specific Soil Cleanup Objective	10		10		10		10		10		10		10		10		10		10	
			TSCA Hazardous Waste	≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50		≥50	
Location	Sample Depth (ft)	Sample Date	Sample Type (N: Primary, FD: Field Duplicate)	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual	Result	Qual
B735-BH19	3-4	02/05/2025	N	0.00434	U	0.0049	U	0.0104	U	0.0066	U	0.028	J	0.00675	J	0.00904	U	--		--		0.03475	
B735-BH19	4-5	02/05/2025	N	0.0043	U	0.00485	U	0.0102	U	0.00652	U	0.055		0.00807	J	0.00894	U	--		--		0.06307	
B735-BH2	3-4	02/05/2025	N	0.0218	U	0.0245	U	0.0519	U	0.033	U	1.87		0.0268	U	0.0453	U	--		--		1.87	
B735-BH2	4-5	02/05/2025	N	0.00422	U	0.00476	U	0.0101	U	0.00641	U	0.238		0.0052	U	0.00879	U	--		--		0.238	

Notes:
-- = not analyzed
> = greater than
PCB = polychlorinated biphenyl
Total Detected PCBs = sum of all detections and reporting limit for non-detect results
TSCA = Toxic Substance Control Act

Qualifier:
J = concentration is estimated
U = non-detect
P = aroclor target analyte has a percent difference greater than 25% between the two Gas Chromatography columns; the lower of the two results is reported.
I = matrix Interference.

Units:
ft = feet
mg/kg = milligram per kilogram

Table 3
Quantity Take-Offs
Reynolds Metal Company St Lawrence Reduction Plant
Massena, New York

Building	Material	Unit	Quantity	
735	Excavation			
	Waste Category		Less than 50 mg/kg PCB	Greater than 50 mg/kg PCB
	Concrete removal area	SF	11,180	3,768
	Concrete volume (12-inch thick slab)	CY	414	140
	Concrete knee wall volume (35-inch tall, 8-inch wide)	CY	23	12
	Footer	CY	N/A	27
	Concrete Total	Ton	874	356
	Excavation area	SF	560	1,500
	Excavation volume (3 ft removal)	CY	62	167
	Total Off-site Disposal	Ton	973	623
	Restoration			
	Backfill volume	CY	844	

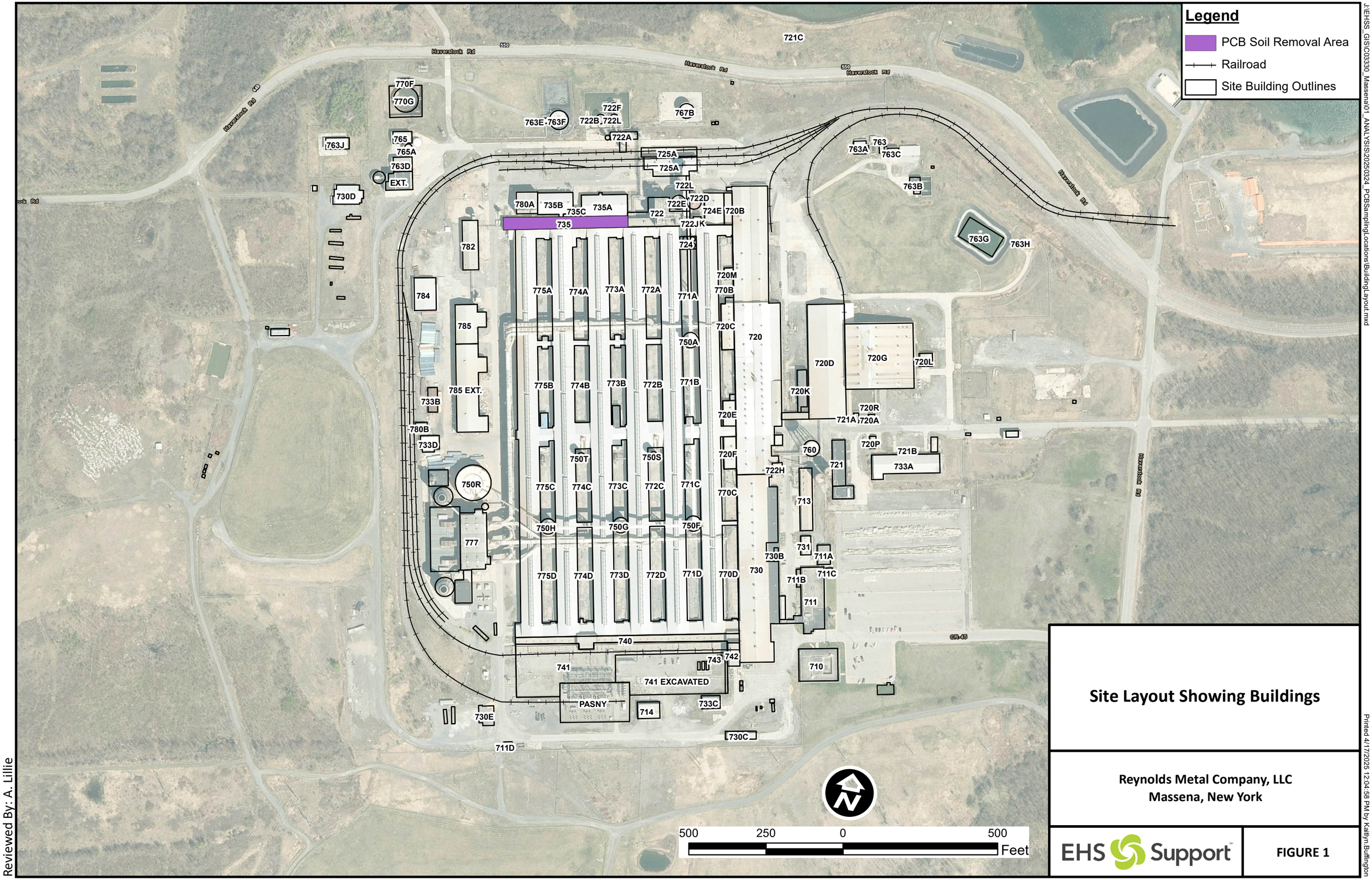
Notes:

CY = cubic yard

HDPE = high-density polyethylene

SF = square feet

Figures



Site Layout Showing Buildings

Reynolds Metal Company, LLC
Massena, New York

EHS Support

FIGURE 1

Reviewed By: A. Lillie

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780A

735B

735A

735C

735

PR-1 PR-2 PR-3 PR-4 PR-5 PR-6 PR-7 PR-8 PR-9 PR-10 PR-11 PR-12 PR-13 PR-14 PR-15 PR-16 PR-17 PR-18

735-C.E

735-C.S

735-COL.4E5556

735-COL.3A5556

735-COL.3A5556-N

735-COL.3A5556-W*

735-COL.3A5556-S

735-COL.4C5556

735-COL.5C5556

735-COL.6B5556

735-COL.6CD5556

735-COL.6E5556

735-COL.7F5556

735-P-N

735-P-W

735-P-E

735-P

Legend

- Highest Total PCB Result
- Deepest Total PCB Result
- Total PCB less than 1 mg/kg
- Total PCBs 1 mg/kg to 10 mg/kg
- Total PCBs 10 mg/kg to 25 mg/kg
- Total PCBs 25 mg/kg to 50 mg/kg
- Total PCBs greater than 50 mg/kg
- Former Channel Press
- Concrete with Total PCBs less than 50 mg/kg
- Concrete with Total PCBs greater than 50 mg/kg
- Concrete Previously Removed and Replaced
- Buildings
- AOC-735

Notes:

All results shown are mg/kg

mg/kg = milligrams per kilogram

Total PCBs = total polychlorinated biphenyls detected in sample

25 12.5 0 25

Scale In Feet

Building 735
PCB Concrete Results and Excavation Limits

Former Reynolds Metal Plant
Massena, New York

EHS Support

FIGURE 2

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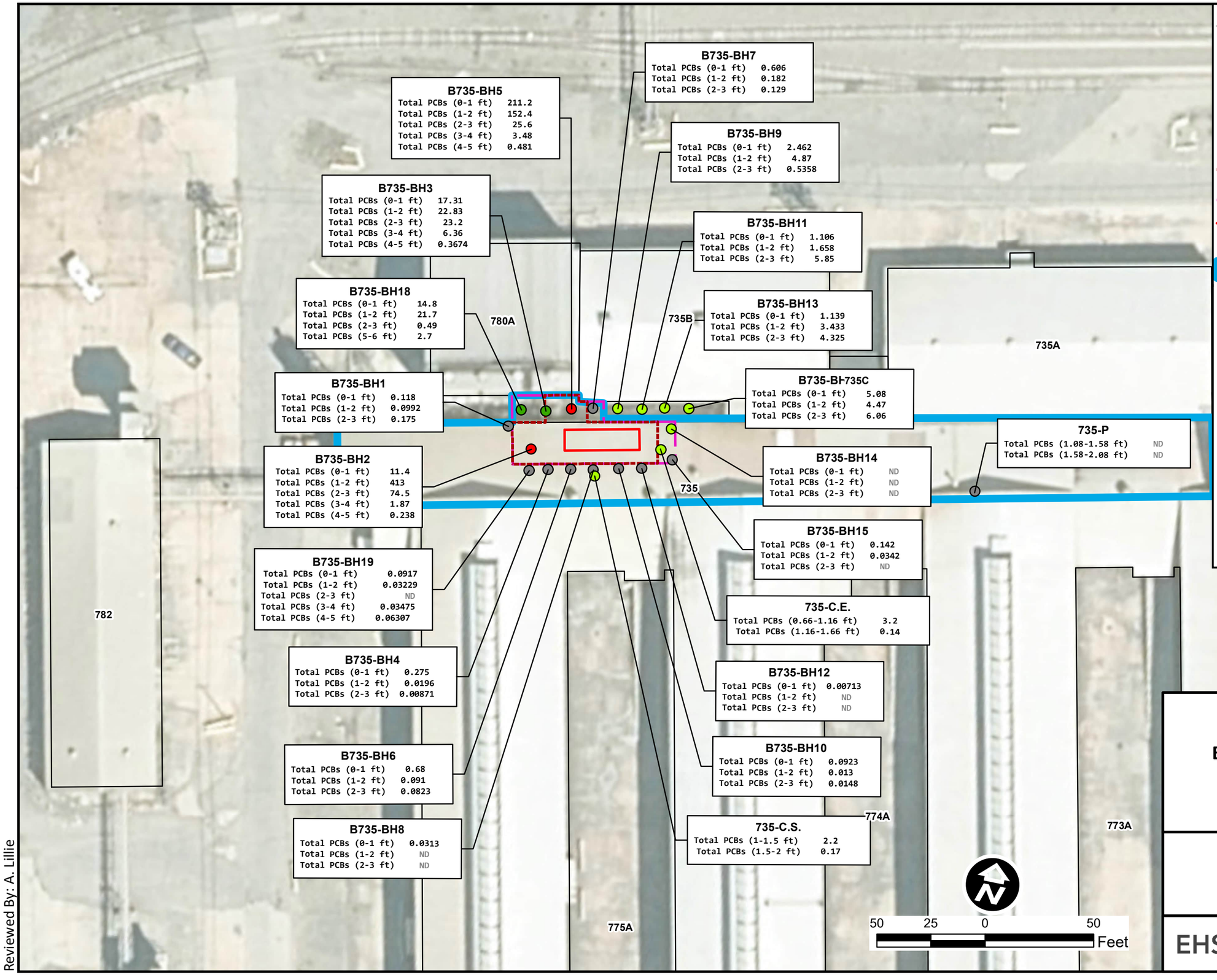

Legend

- Total PCB less than 1 mg/kg
- Total PCBs 1 mg/kg to 10 mg/kg
- Total PCBs 10 mg/kg to 25 mg/kg
- Total PCBs 25 mg/kg to 50 mg/kg
- Total PCBs greater than 50 mg/kg
- Manage Soil as Greater than 50 ppm PCB
- Excavation Limit
- Former Channel Press
- Site Building Outlines
- AOC-735

Note:

All results shown are mg/kg

mg/kg = milligrams per kilogram

Total PCBs = total polychlorinated biphenyls detected in sample

Sample Depth Interval is top and bottom of sampled interval (successive 0.5 or 1-foot intervals sampled) for laboratory analysis

Total PCB results shown for locations where a criteria exceedence was identified. Concentration is total PCBs detected above reporting limits

Data from sampling events completed between October 2022 and March 2025

Building 735 PCB Soil Results and Excavation Limits

Reynolds Metal Company, LLC
Massena, New York

EHS Support

FIGURE 3

Reviewed By: A. Lillie

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LEGEND

MANAGE CONCRETE AS LESS THAN 50 PPM PCB

MANAGE CONCRETE AS GREATER THAN 50 PPM PCB

LIMIT OF CONCRETE WITH TOTAL PCBS LESS THAN 50 MG/KG

AREA PREVIOUSLY COVERED IN STEEL PLATES

COLUMN 6C, 56

COLUMN 6E, 56

COLUMN 5A, 56

COLUMN 6A, 56

19.8'

CHANNEL PRESS

LIMIT OF CONCRETE WITH TOTAL PCBS GREATER THAN 50 MG/KG

COLUMN 6C, 55

EHS Support

5 0 10

GRAPHIC SCALE IN FEET

N

REYNOLD METALS COMPANY MASSENA EAST PLAN MASSENA, NY		BUILDING 735 CONCRETE REMOVAL AREA
	DATE: 08/21/25	DRAWN BY: AC **FIGURE 4A**

LEGEND

MANAGE CONCRETE AS LESS THAN 50 PPM PCB

MANAGE CONCRETE AS GREATER THAN 50 PPM PCB

COLUMN 6E, 56

COLUMN 5A, 56

LIMIT OF CONCRETE WITH TOTAL PCBS LESS THAN 50 MG/KG

18.5'

COLUMN 4A, 55

EHS Support

5 0 10

GRAPHIC SCALE IN FEET

N

REYNOLD METALS COMPANY MASSENA EAST PLAN MASSENA, NY		BUILDING 735 CONCRETE REMOVAL AREA
	DATE: 08/21/25	DRAWN BY: AC

FIGURE 4B

LEGEND

MANAGE CONCRETE AS LESS THAN 50 PPM PCB

MANAGE CONCRETE AS GREATER THAN 50 PPM PCB

COLUMN 4E, 56

COLUMN 4G, 56

LIMIT OF CONCRETE WITH TOTAL PCBS GREATER THAN 50 MG/KG

LIMIT OF CONCRETE WITH TOTAL PCBS LESS THAN 50 MG/KG

LIMIT OF CONCRETE WITH TOTAL PCBS GREATER THAN 50 MG/KG

20'

COLUMN 4A, 55

COLUMN 4B, 55

COLUMN 4C, 55

COLUMN 4E, 55

COLUMN 4G, 55

10'

11'

11'

10'

EHS Support

5 0 10

GRAPHIC SCALE IN FEET

N

REYNOLD METALS COMPANY MASSENA EAST PLAN MASSENA, NY		BUILDING 735 CONCRETE REMOVAL AREA
	DATE: 08/21/25	DRAWN BY: AC

FIGURE 4C

LEGEND

LIMIT OF 3' SOIL EXCAVATION

MANAGE SOIL AS GREATER THAN 50 PPM PCB

LIMIT OF 3' SOIL EXCAVATION
3' CUT STARTS AT
TOP OF SOIL BELOW SLAB

FOLLOW EDGE OF
ADJACENT BUILDING
FOUNDATION TO NORTH

LIMIT OF SOIL WITH
TOTAL PCBS GREATER
THAN 50 MG/KG

EXCAVATION STOPS
AT EDGE OF BUILDING 735

COLUMN 5A, 56

COLUMN 6C, 56

COLUMN 6E, 56

6.2'

4.5'

8.1'

19.0'

EHS Support

5 0 10

GRAPHIC SCALE IN FEET

N

REYNOLD METALS COMPANY MASSENA EAST PLAN MASSENA, NY		BUILDING 735 SOIL REMOVAL AREA	
	DATE: 08/14/25	DRAWN BY: AC	**FIGURE 5**

LEGEND

- LIMIT OF EXCAVATION
- EXISTING COLUMN
- CONFIRMATION SAMPLING GRID
- CONFIRMATION BOTTOM SAMPLE LOCATION
- CONFIRMATION SIDEWALL SAMPLE LOCATION

CONFIRMATION SIDEWALL SAMPLE

CONFIRMATION SAMPLING GRID

5.0'

5.0'

COLUMN 6E, 56

COLUMN 5A, 56

COLUMN 6C, 56

CONFIRMATION BOTTOM SAMPLE

1 2 3 4 5 6 7

A B C D E F G H I J K L M N O

EHS Support

5 0 10

GRAPHIC SCALE IN FEET

N

REYNOLD METALS COMPANY MASSENA EAST PLAN MASSENA, NY		BUILDING 735 CONFIRMATION SAMPLING PLAN
	DATE: 08/14/25	DRAWN BY: AC — **FIGURE 6**