SMP Template: August 2015

FORMER GRAND UNION WASHINGTON COUNTY TOWN OF FORT EDWARD, NEW YORK

SITE MANAGEMENT PLAN

NYSDEC Site Number: C558033

USEPA ID # BF96286614 & CTM Project # 13.3341

Prepared for:

Town of Fort Edward 118 Broadway Fort Edward, NY 12828

&

354 Broadway LLC 170 West 74th Street New York, NY 10023

&

Price Chopper Operating Co. Inc. 461 Nott Street Schenectady, NY 12308

Prepared by:

C.T. Male Associates Engineering, Surveying, Architecture & Landscape Architecture, D.P.C. 50 Century Hill Drive, Latham, NY 12020 518.786.7400

Revisions to Final Approved Site Management Plan:

Revision No.	Date Submitted	Summary of Revision	NYSDEC Approval Date

OCTOBER 2015

CERTIFICATION STATEMENT

SITE MANAGEMENT PLAN FORMER GRAND UNION SITE FORT EDWARD, NEW YORK

I Jeffrey A. Marx, P.E. certify that I am currently a NYS registered professional engineer as in defined in 6 NYCRR Part 375 and that this Site Management Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

082100		
NYS Professional Engineer #	Date	Signature

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List of Acronyms

AS Air Sparging

ASP Analytical Services Protocol BCA Brownfield Cleanup Agreement BCP Brownfield Cleanup Program

CERCLA Comprehensive Environmental Response, Compensation and Liability Act

CAMP Community Air Monitoring Plan
C/D Construction and Demolition
CFR Code of Federal Regulation
CLP Contract Laboratory Program
COC Certificate of Completion

CO2 Carbon Dioxide CP Commissioner Policy

DER Division of Environmental Remediation

EC Engineering Control

ECL Environmental Conservation Law

ELAP Environmental Laboratory Approval Program

ERP Environmental Restoration Program

EWP Excavation Work Plan GHG Green House Gas

GWE&T Groundwater Extraction and Treatment

HASP Health and Safety Plan IC Institutional Control

NYSDEC New York State Department of Environmental Conservation

NYSDOH New York State Department of Health NYCRR New York Codes, Rules and Regulations

O&M Operations and Maintenance

OM&M Operation, Maintenance and Monitoring

OSHA Occupational Safety and Health Administration

OU Operable Unit

PID Photoionization Detector PRP Potentially Responsible Party PRR Periodic Review Report

QA/QC Quality Assurance/Quality Control
QAPP Quality Assurance Project Plan
RAO Remedial Action Objective
RAWP Remedial Action Work Plan

RCRA Resource Conservation and Recovery Act RI/FS Remedial Investigation/Feasibility Study

ROD Record of Decision RP Remedial Party

RSO Remedial System Optimization SAC State Assistance Contract

SCG Standards, Criteria and Guidelines

C.T. MALE ASSOCIATES

SCO Soil Cleanup Objective SMP Soil Management Plan

SOP Standard Operating Procedures

SOW Statement of Work

SPDES State Pollutant Discharge Elimination System

SSD Sub-slab Depressurization SVE Soil Vapor Extraction SVI Soil Vapor Intrusion

SVMS Soil Vapor Mitigation System

TAL Target Analyte List
TCL Target Compound List

TCLP Toxicity Characteristic Leachate Procedure
USEPA United States Environmental Protection Agency

UST Underground Storage Tank
VCA Voluntary Cleanup Agreement
VCP Voluntary Cleanup Program

ES EXECUTIVE SUMMARY

The following provides a brief summary of the controls implemented for the Site, as well as the inspections, monitoring, maintenance and reporting activities required by this Site Management Plan.

Site Identification:	NYSDEC Site ID No. C558033 USEPA ID No. BF96286614 Former Grand Union, 354 Broadway, Fort Edward, NY
BCA Volunteers	Town of Fort Edward 354 Broadway LLC
	Price Chopper Operating Co., Inc.
Institutional Controls:	 The property may be used for restricted commercial and industrial use; the intended future use of the site is a supermarket. Construction of the supermarket in the construction envelope that has been prepared for construction of the supermarket will not constitute a change of use. All ECs must be inspected at a frequency and in a
	manner defined in the SMP. The soil cover system is the only engineering control at this site.
	3. All ECs must be operated and maintained as specified in this SMP;
	4. The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.
	5. Data and information pertinent to site management must be reported at the frequency and in a manner as defined in this SMP.

Institutional Controls (continued):	contaminated materi with this SMP. 7. Monitoring to asse of the remedy must be a second to the remedy must be a second to the remedy shall be perfectly as a second to the second	ess the performance and effectiveness be performed as defined in this SMP. enance, monitoring, inspection, and chanical or physical component of the formed as defined in this SMP. site must be provided to agents, representatives of the State of New e prior notice to the property owner ats to assure compliance with the liby the Environmental Easement.
Engineering Controls:	geotextile fabric plus above the demarcation intended for constru- excavated to below and filled with clean for engineering conti- will be impacted be activities above the	a demarcation layer consisting of a minimum of one foot of clean soil on layer); however the area of the site action of the supermarket has been the depth intended for construction a, structural fill to eliminate the need rols in the area and to the depth that by construction. All construction demarcation layer in the remaining shown on Figure 5 will not trigger is SMP.
Inspections:		Frequency
Cover inspection		Annually
Monitoring:		Not Applicable
Maintenance:		Only if impacted by construction activities or natural causes
1. Stormwater Management		Not Applicable
Reporting:		
1. Periodic Review Report		Annually

Further descriptions of the above requirements are provided in detail in the latter sections of this Site Management Plan.

1.0 INTRODUCTION

1.1 General

This Site Management Plan (SMP) is a required element of the remedial program for the Former Grand Union located in the Town of Fort Edward, New York (hereinafter referred to as the "Site"). See Figure 1. The Site is currently in the New York State (NYS) Brownfield Cleanup Program (BCP), Site No. C558033, which is administered by New York State Department of Environmental Conservation (NYSDEC).

The Town of Fort Edward and 354 Broadway, LLC entered into a Brownfield Cleanup Agreement (BCA), on February 11, 2014 with the NYSDEC to remediate the site. Price Chopper Operating Co. Inc. was subsequently added as a party to the BCA in September 2015. A figure showing the site location and boundaries of this site is provided in Figure 2. The boundaries of the site are more fully described in the metes and bounds site description that is part of the Environmental Easement provided in Appendix B.

After completion of the remedial work, some contamination was left at this site, which is hereafter referred to as "remaining contamination". Institutional and Engineering Controls (ICs and ECs) have been incorporated into the site remedy to control exposure to remaining contamination to ensure protection of public health and the environment. An Environmental Easement granted to the NYSDEC, and recorded with the Washington County Clerk, requires compliance with this SMP and all ECs and ICs placed on the site. Any BCA party may propose to amend the Environmental Easement, following approval by the NYSDEC of the form of the amendment and receiving concurrence from the property owner, to include a description of the remaining contamination areas of the site as shown on Figure 5.

This SMP was prepared to manage remaining contamination at the site until the Environmental Easement is extinguished in accordance with ECL Article 71, Title 36. This plan has been approved by the NYSDEC, and compliance with this plan is required by the grantor of the Environmental Easement and the grantor's successors and assigns. This SMP may only be revised with the approval of the NYSDEC.

It is important to note that:

- This SMP details the site-specific implementation procedures that are required by the Environmental Easement. Failure to properly implement the SMP is a violation of the Environmental Easement, which is grounds for revocation of the Certificate of Completion (COC);
- Failure to comply with this SMP is also a violation of Environmental Conservation Law, 6NYCRR Part 375 and the BCA (Site # C558033-01-14) for the site, and thereby subject to applicable penalties.

All reports associated with the site can be viewed by contacting the NYSDEC or its successor agency managing environmental issues in New York State. A list of contacts for persons involved with the site is provided in Appendix A of this SMP.

This SMP was prepared by C.T. Male Associates Engineering, Surveying, Architecture & Landscape Architecture, D.P.C, on behalf of the Town of Fort Edward, 354 Broadway LLC and Price Chopper Operating Co. Inc., in accordance with the requirements of the NYSDEC's DER-10 ("Technical Guidance for Site Investigation and Remediation"), dated May 2010, and the guidelines provided by the NYSDEC. This SMP addresses the means for implementing the ICs and/or ECs that are required by the Environmental Easement for the site.

1.2 Revisions

Revisions to this plan will be proposed in writing to the NYSDEC's project manager. Revisions will be necessary upon, but not limited to, the following occurring:

a change in media monitoring requirements, upgrades to or shut-down of a remedial system, post-remedial removal of contaminated sediment or soil, or other significant change to the site conditions. In accordance with the Environmental Easement for the site, the NYSDEC will provide a notice of any approved changes to the SMP, and append these notices to the SMP that is retained in its files.

1.3 Notifications

Notifications will be submitted by the property owner to the NYSDEC, as needed, in accordance with NYSDEC's DER – 10 for the following reasons:

- 60-day advance notice of any proposed changes in site use that are required under the terms of the BCA, 6NYCRR Part 375 and/or Environmental Conservation Law. Construction of the supermarket on-site shall not be subject to this SMP unless it occurs at or below the demarcation layer for the areas of remaining contamination shown on Figure 5 and will not be subject to this notice and approval process.
- 7-day advance notice of any field activity associated with the remedial program.
- 15-day advance notice of any proposed ground-intrusive activity pursuant to the Excavation Work Plan (EWP).
- Notice within 48-hours of any damage or defect to the foundation, structures or EC that reduces or has the potential to reduce the effectiveness of an EC, and likewise, any action to be taken to mitigate the damage or defect.
- Verbal notice by noon of the following day of any emergency, such as a fire; flood; or earthquake that reduces or has the potential to reduce the effectiveness of ECs in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.
- Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action submitted to the NYSDEC within 45 days describing and documenting actions taken to restore the effectiveness of the ECs.

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

- At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser/Remedial Party has been provided with a copy of the Brownfield Cleanup Agreement (BCA), and all approved work plans and reports, including this SMP.
- Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing to the NYSDEC.

Table 1.3-1 on the following page includes contact information for the above notification. The information on this table will be updated as necessary to provide accurate contact information. A full listing of site-related contact information is provided in Table 1.3-2.

Table 1.3-1: Notifications*

Name	Contact Information
	Telephone: 518.402.9563
NYSDEC Project Manager: Daniel Eaton	
	Email: daniel.eaton@dec.ny.gov
NYSDEC Regional HW Engineer: Russell	Telephone: 518.987.1200
Huyck, P.E.	Email; Russell.huyck@dec.ny.gov
•	
NYSDEC Site Control	Telephone: 518.402.9706
NISDEC Site Collifor	Email: derweb@dec.ny.gov

Table 1.3-2: Contact Numbers

Name and Affiliation	Contact Information
Town of Fort Edward	Telephone: 518.747-5212
Mitch Suprenant	Email: supervisor@fortedward.net
354 Broadway, LLC	Telephone: (212) 362-9800 & (518) 456-5440
David Kaplan and Bruce Ginsburg	Email: david@krg.info &
David Kapian and Druce Omsourg	Bginsburg@ikonrealtygroup.com
Price Chopper Operating Co. Inc.	
461 Nott Street	Telephone: (518) 379-1391
Schenectady, NY 12308	Email: nancysantana@pricechoper.com
Nancy Santana	
Qualified Environmental Professional	Telephone: (518) 786-7400
C.T. Male Associates	Email: j.marx@ctmale.com
Jeffrey A. Marx, PE	Linan, j.marx@cunaic.com

^{*} Note: Notifications are subject to change and will be updated as necessary.

2.0 SUMMARY OF PREVIOUS INVESTIGATIONS AND REMEDIAL ACTIONS

2.1 Site Location and Description

The site is located in the Town of Fort Edward, Washington County, New York and is identified as Section 163.10 Block 1 and Lot 46.3 on the Town of Fort Edward Tax Map (see Figure 2). The site is an approximately 5.94 -acre area and is bounded by residential properties and Caputo Avenue to the north, commercial property to the south, school district property (former school) to the east, and commercial property and Broadway to the west (see Figure 2 – Site Layout Map). The boundaries of the site are more fully described in Schedule "A" Property Description of the Environmental Easement. The owner of the site parcel at the time of issuance of this SMP is:

• Town of Fort Edward

2.2 Physical Setting

2.2.1 Land Use

The Site is a commercially zoned vacant lot that is in the process of being redeveloped for use as a supermarket. Immediately prior to conducting the approved Remedial Actions the site contained the remnants of a former grocery store (empty building shell) and related parking lot.

The properties adjoining the Site and in the neighborhood surrounding the Site primarily include commercial and residential properties. The properties immediately south of the Site include commercial and residential properties; the properties immediately north of the Site include residential properties; the properties immediately east of the Site include commercial (school district property used for administrative purposes); and the properties to the west of the Site include commercial properties.

2.2.2 Geology

The dominant soil component of the subject property is Oakville loamy fine sand. This soil type typically consists of very deep, excessively drained soils formed in sandy eolian deposits on dunes and beach ridges on outwash plains, lake plains, or moraines. Additional subordinate soil types that may appear in the vicinity of the subject property are silty loams, loamy fine sand, and channery (soils that are by volume, more than 15 percent thin, flat fragments of sandstone, shale, slate, limestone, or schist) loams extending from the soil surface to shallow soils. Deeper soils may consist of silt loam, fine sand, unweathered bedrock, silt clay, gravely loam, or very channery loams.

The overburden at the subject property consists of approximately 10 to 25 feet of sand underlain by up to 45 feet of low permeability clay and glacial till. Glacial till rests above the native shale bedrock of the Snake Hill (shale) Formation. The shale is reported to be approximately 500 feet thick and is underlain by the Glen Falls Limestone.

2.2.3 Hydrogeology

Based on water levels obtained from monitoring wells installed during previous site investigations, the depth to groundwater within the site is approximately 6 to 12 feet below existing grades. All previously existing monitoring wells with the site were properly abandoned during the Remedial Action. Based on the findings of the previous site investigations groundwater flow direction is toward the south-southwest. Regionally, groundwater flow is westerly toward the Hudson River. The upper unconsolidated aquifer is approximately 10 to 25 feet in thickness and composed predominantly of sand with lesser percentages of finer silt. This aquifer has a potential to yield more than 100 gallons per minute. The hydraulic conductivity of the aquifer is relatively high. The soils underlying the upper aquifer are composed of low permeability clay and glacial till.

There are no known water supply wells is the vicinity of the site; the Town of Fort Edward provides municipal water to the community. The municipal water is taken from a reservoir on the western side of the Hudson River.

2.3 Investigation and Remedial History

The site has been abandoned since 2003. From 1980 to 2003 the site operated as the Grand Union Supermarket. Prior to 1980, the site was utilized as a gravel pit and operations involving the dismantling and recycling of capacitors was reportedly also conducted on the site.

The site was improved in 1980 with a 31,456 square foot single-story structure that was formerly used as the Grand Union Supermarket. The existence of site structures prior to 1980 is unknown.

The following narrative provides a remedial history timeline and a brief summary of the available project records to document key investigative and remedial milestones for the Site. Full titles for each of the reports referenced below.

Several environmental assessments, investigations and remedial actions were completed at the subject site from 2003 to 2014. Detail of the site's environmental history is presented in the following reports.

- Report for the Preliminary Site Assessment (PSA) at the Upper Broadway Site prepared by Ecology and Environment Engineering, P.C. (E&E), dated October 2004 (2004 E&E PSA).
- Final Closure Report for the Removal and Disposal of Soil Containing PCBs in the Vicinity of Test Pit TP-12, prepared by Malcolm Pirnie, Inc. (MPI), dated March 22, 2005 (2005 MPI Final Closure Report).

- October 17–November 17, 2006 Progress Report prepared by MPI for NYSDEC (2006 MPI Progress Report).
- November 20-December 22, 2006 Progress Report prepared by MPI for NYSDEC (2006 MPI Progress Report).
- Final Phase I Report, Former Grand Union Targeted Brownfields Assessment prepared by CDM Federal Programs Corporation, dated December 2010 (2010 CDM Final Phase I Report).
- Final Removal Assessment Sampling Trip Report prepared by Weston Solutions, Inc. (Weston), dated April 27, 2012 (2012 Weston Final Removal Assessment).
- Removal Site Evaluation for the Former Grand Union Site, Fort Edward, New York prepared by EPA Removal Action Branch, dated May 31, 2012 (2012 EPA Removal Site Evaluation Report).
- Phase I Environmental Site Assessment, Former Grand Union Site, 354 Broadway Town of Fort Edward, Washington County, New York, dated October 28, 2012 prepared for the Town of Fort Edward, (2012 Phase I ESA).
- Remedial Action Work Plan, Former Grand Union, 354 Broadway, Town of Fort Edward, Washington County, New York, BCP Site No. C558033, dated October 2014 prepared for the Town of Fort Edward & 354 Broadway LLC, (2014 Remedial Action Work Plan).

The following summarizes the site's environmental history.

2004 E&E PSA

The PSA field work was conducted in two (2) phases in 2003 and 2004. Phase I field investigations included the collection and analysis of surface soil samples, collection and analysis of subsurface soil samples from site storm sewers, collection and analysis of subsurface soil samples from three (3) test borings that were converted to monitoring wells, collection and analysis of groundwater samples from the newly installed monitoring wells and from existing monitoring wells believed to have been installed as part of the General Electric Fort Edward Plant investigations, collection of 33 soil gas samples from the site and the site's east adjoining school property, and the performance of a geophysical survey to determine the presence of anomalies that may be indicative of

buried drums. Phase II field investigations were based on the results and findings of the Phase I investigative efforts and included collection and analysis of groundwater samples from the newly installed monitoring wells and two (2) of the existing wells, and completion of six (6) test pits to verify geophysical anomalies and for collection of subsurface soil samples.

Results of the investigation revealed cyanide at concentrations exceeding applicable regulatory criteria in groundwater and storm sewer sediment, and PCB, pesticide and metal concentrations exceeding applicable criteria in subsurface soils collected from test pits UB-TP4 and UB-TP12. The 2010 E&E PSA recommended that further investigation be conducted in the areas of test pits UB-TP4 and UB-TP12.

2005 MPI Final Closure Report and 2006 MPI Progress Reports

MPI was retained by the site owner (DVL, Inc.) at this time to remediate PCB-impacted soils in the vicinity of UB-TP12. The areal extent of impacted soils around UB-TP12 was delineated through the advancement of 28 soil borings and collection of soil samples for PCB analysis. PCB-impacted soils were excavated and disposed of off-site in the winter of 2004/2005.

In October 2005, additional soil borings were advanced to delineate the extent of PCB-impacted soils in the area of UB-TP4. In the first quarter of 2006, additional soil borings along the northern and eastern portions of the site were advanced to assess if any additional, previously unknown areas of PCB contamination existed. Based on the results, several other areas in addition to UB-TP4 contained soils with PCB concentrations greater than 1 ppm. In July 2006, additional soil borings were completed in the main site parking lot at the request of a potential site purchaser. Based on the results, PCBs at concentrations exceeding 1 ppm were found beneath the parking lot. Remedial actions were conducted at the site in October and November of 2006. Approximately 4,120 tons of PCB-contaminated soil was removed from the site. Endpoint confirmatory excavation samples showed PCB concentrations as high as 5,193 ppm and 9,780 ppm in samples collected from the excavation in the main parking area and near the southwest corner of the Grand Union building and PCB concentrations greater than 50 ppm at one (1) sampling location from the excavation around UB-TP4.

Additional excavations were conducted in November and December of 2006 in an attempt to remove remaining contaminated soil. Approximately 6,437 tons of PCB-contaminated soil (PCBs >1 ppm) was excavated. End-point confirmatory excavation samples showed PCB concentrations ranging from 11.2 ppm to 52 ppm near the southwest corner of the Grand Union building, PCB concentrations ranging from 1.2 ppm to 2.6 ppm in the excavation extended to the site's southern property line with the Agway property, a PCB concentration of 5.2 ppm from a bottom sample collected in the center of the parking lot, and a PCB concentration of 3.5 ppm at the south end of UB-TP4 excavation.

2010 CDM Final Phase I Report

This report consists of a Phase I ESA that was conducted on behalf of the United States Environmental Protection Agency (EPA) as part of a Targeted Brownfield Assessment (TBA) grant awarded under the American Recovery and Reinvestment Act of 2009. The purpose of the Phase I ESA was to identify the presence of recognized environmental conditions (RECs) at the subject property and to determine if a site investigation was needed. The report identified the following potential RECs for the site.

- Evidence that PCB-contaminated soils remain near the southwest corner of the building, and that these contaminated soils may extend beneath the structure.
- Three (3) excavation sidewall samples collected from the south side of the UB-TP4/SB-60 excavation exhibit PCB concentrations above the NYSDEC cleanup criterion.
- Elevated concentrations of cyanide were detected in site groundwater in 2004.
 The source of the cyanide was not identified nor was a follow-up investigation
 conducted. There is also the potential that existing contaminants in the subsurface
 soils have migrated into groundwater as a result of previous excavations and
 earthwork.
- The former Grand Union Supermarket registered a septic system including a septic tank and two leach pits. The location of the tank and leach pits are not known, nor is it known if the tank and leach pits were closed and removed.
- The 1966 topographic map identifies the area of the existing ravine on the east side of the subject property as a gravel pit. Current conditions of the ravine are

defined by uneven terrain and vegetation. In 2004, a limited test pit investigation on the subject property (2004 E&E PSA) were subsurface anomalies were identified during the geophysical survey. In general, test pits revealed construction debris, concrete and bricks, tires and metal parts buried in the subsurface. Test pits were biased towards the northern portion and the southeast corner of the subject property. No test pits were performed on the east/ rear end of the subject property in the ravine area.

• The interior of the former Grand Union Supermarket structure was not assessed during this Phase I ESA; its condition is not known. The building is in poor condition and was observed with wood beams precariously situated on exposed I-beams to support building walls. Cracks in the exterior cinder block walls were also observed. There is a potential that sources of contamination may be present inside the structure.

Based on the results of the Phase I ESA, CDM recommended that a Phase II ESA be performed. CDM recommended the following to assess potential RECs at the subject property:

- A geophysical survey to identify if the sanitary system comprised of a septic tank and leach pits may still exists on the subject property.
- Advancement of soil borings to the water table to determine if elevated concentrations of PCBs remain in subsurface soils near the southwest corner of the on-site structure and on the east side of the structure where no soil investigation had been conducted.
- Advancement of soil borings to the water table to determine if subsurface contamination exists in the ravine area where a gravel pit existed in 1966 and which may have been subject to historic dumping.
- Confirm the viability of the monitoring wells previously installed on the subject property and if viable, collect groundwater samples from the wells for laboratory analysis to characterize current groundwater conditions.
- Inspect the interior of the on-site building to determine if environmental conditions are present inside the building such as floor drains, sumps, hazardous materials, tanks, etc that may have been used on or could have impacted the subject property.

• Conduct a vapor intrusion assessment of the building including the installation of sub-slab and indoor air samples to determine if contamination is present beneath the building which is infiltrating the building slab.

2012 Weston Final Removal Assessment

In October and November of 2011, Weston, under contract with the EPA and in concert with NYSDEC, performed a multi-media subsurface investigation of the site and the south adjoining Agway property to determine if the site was eligible for an EPA Removal Action.

The investigation concentrated on areas of the site not previously investigated or remediated and included the installation of 12 soil borings up to 15 feet in depth through the slab inside the site building, installation of 32 test pits on north, east, and south sides of the site building down to the water table, installation of two (2) shallow monitoring wells on the site's south adjoining Agway property and sampling of existing monitoring wells, and installation of two (2) sub-slab soil gas sampling ports inside the site building. Weston collected 131 soil samples for PCB analysis; 10 soil samples for VOC analysis; 7 groundwater samples for PCB, VOC, and SVOC analyses; and 3 sub-slab soil gas samples for TO-15 VOC analysis.

Results of the investigation showed soil samples from three (3) borings contained total PCBs at concentrations greater than 25 ppm, the NYSDEC soil cleanup objective (SCO) for Industrial Use properties (high of 74 ppm); soil samples from two (2) borings and two (2) test pits contained total PCBs at concentrations greater than 1 ppm, the NYSDEC SCO for Residential/Commercial Use properties; and a soil sample from one (1) test pit contained SVOC concentrations greater than the NYSDEC SCO for Industrial Use properties. All other results for soil, groundwater, and soil gas samples were either not detected or did not exceed the EPA Regional Screening Levels.

Based on the investigation, the EPA concluded that several subsurface soil samples under the southern portion of the building and outside southwest corner of the building contained concentrations of PCBs exceeding NYSDEC SCOs and that the site is not eligible for an EPA Removal Action because a complete exposure pathway to

receptors does not exist as contaminants are either under the building foundation or under asphalt parking area and a large volume of source contamination threatening the environment was not found on the site.

2012 Phase I Environmental Site Assessment

The Phase I ESA was completed for the Town of Fort Edward in support of the USEPA Brownfields Assessment Grant application. The purpose of the Phase I ESA was to identify the presence of recognized environmental conditions (RECs) at the subject property based on the previous site investigations and remedial actions completed within the site. This assessment revealed the following recognized environmental conditions in connection with the property:

- Site soils remain impacted by PCBs at concentrations exceeding regulatory criteria. The impacted soils extend beneath the site building.
- Prior to 1980, the site was reportedly used for the dismantling and recycling of capacitors. Solvent and PCB liquids from the capacitors were dumped on the site during the 1960's and 1970's. A former gravel pit located beneath the current building and to the east of the building was filled-in with unknown materials.
- The site was listed within the environmental databases report as a CERLIS "Not Proposed" site, RCRA Large Quantity Generator and Federal Brownfields site.
- An historic septic system is believed to exist at the site. The location of this system and impacts to media surrounding the system has not been evaluated.

Based on the findings of this ESA the following recommendations were made:

- Further delineation of remaining PCB-impacted soils and institute a remedial action to remediate remaining impacted soils.
- Further evaluation of the subsurface conditions beneath the site building for evidence of historic dumping in this area.
- Further evaluate the existence of an historic septic system beneath the site.

2014 Remedial Action Work Plan

As part to the preparation of the Remedial Action Work Plan (RAWP) per the BCP, a Pre-Design Investigation (PDI) was preformed to further delineate the extent of PCBs and SVOCs in soils documented in previous Site investigations and remedial actions. The PDI was conducted in two phases in June 2014 and July 2014. Based on the preliminary results from the initial phase of the investigation, a second phase of soil sampling was completed to further evaluate the extent PCB impacted soils requiring remediation.

The June 2014 investigation involved the completion of 42 soil borings utilizing Geoprobe drilling methods within the southern portion of the former Grand Union structure and the southeastern corner of the site referred to as the "Panhandle". Two (2) of the 42 soil borings (C4 and R) were converted to temporary small diameter monitoring wells for groundwater sampling and laboratory analysis. The second phase of work was completed in July 2014 and involved the completion of 20 additional soil borings. Not including quality assurance/quality control samples, a total of 288 soil samples were analyzed for PCBs and 33 soil samples analyzed for SVOCs. Two (2) groundwater samples were collected from the newly installed monitoring wells.and analyzed for the Target Compound List (TCL) of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), Pesticides and PCBs, and the Target Analyte List (TAL) of metals, plus Cyanide.

The results of the investigation delineated the vertical and horizontal limits of PCBs in soils at concentrations >1 ppm and < 50 ppm, and >50 ppm within the area of the former building floor slab and Panhandle, and SVOCs in soils within the Panhandle. With these results, the Remedial Action Work Plan was prepared and ultimately approved by NYSDEC.

2.4 Remedial Action Objectives

The Remedial Action Objectives (RAOs) for the Site as listed in Section 6.5 of the Decision Document dated January 21, 2015 are as follows:

Soil

RAOs for Public Health Protection

• Prevent ingestion/direct contact with contaminated soil.

RAOs for Environmental Protection

• Prevent impacts to biota from ingestion/direct contact with soil causing toxicity or impacts from bioaccumulation through the terrestrial food chain.

2.5 Remaining Contamination

2.5.1 Soil

The Remedial Action removed PCBs in soils to concentrations less than 1 ppm within the upper one foot of soil horizon, and less than 10 ppm in soils below one foot within the property boundaries. SVOCs in Panhandle were removed to concentrations below Commercial Use SCOs. The remaining PCBs in site soils exist primarily at concentrations > 0.1 ppm and < 1 ppm. Figures 3a, 3b, 3c, 3d, 3e and 3f, and Tables 2.5.1-1 through 2.5.1-6 present the end point soil sampling locations and PCB concentrations from implementation of the remedial action.

Remaining contamination within the site is defined as those areas of the site with total PCBs in soils greater than 1 ppm at ground surface to a depth of one foot below the surface, and soils below one foot of the ground surface with total PCBs greater than 1 ppm and less than 10 ppm. The areas of remaining contamination subject to this SMP are the following areas that have been subjected to remedial excavation.

- Historical Excavations performed by previous owners or managed by DEC.
- Excavation Area A, B, C, D, E and F, as shown on Figure 4.

If the remaining contamination below the demarcation fabric within the areas identified above are disturbed or damaged, the disturbance or damage will trigger conformance to this SMP. Figure 5 depicts the limits of demarcation and surface cover areas. Figure 5 includes survey data regarding the horizontal and vertical location of the

of the demarcation layer shown in Figure 5 may be disturbed without trigging conformance to the SMP. Within those areas, soils above the cover system may be disturbed without triggering conformance to the SMP as long as the cover system is not disturbed or is restored to a minimum of 12 inches of clean soil cover following construction. The cover system includes a demarcation fabric to identify the top of the remaining contamination.

2.5.2 Groundwater

There is no remaining contamination associated with groundwater.

2.5.3 Soil Vapor

There is no remaining contamination associated with soil vapor.

3.0 INSTITUTIONAL AND ENGINEERING CONTROL PLAN

3.1 General

Since remaining contamination exists at the site, Institutional Controls (ICs) and Engineering Controls (ECs) are required to protect human health and the environment. This IC/EC Plan describes the procedures for the implementation and management of all IC/ECs at the site. The IC/EC Plan is one component of the SMP and is subject to revision by the NYSDEC.

This plan provides:

- A description of all IC/ECs on the site;
- The basic implementation and intended role of each IC/EC;
- A description of the key components of the ICs set forth in the Environmental Easement;
- A description of the controls to be evaluated during each required inspection and periodic review;
- A description of plans and procedures to be followed for implementation of IC/ECs, such as the implementation of the Excavation Work Plan (EWP) (as provided in Appendix C) for the proper handling of remaining contamination covered by demarcation layer as shown in Figure 5 that may be disturbed during maintenance or redevelopment work on the site; and
- Any other provisions necessary to identify or establish methods for implementing the IC/ECs required by the site remedy, as determined by the NYSDEC.

3.2 Institutional Controls

A series of ICs is required by the Decision Document to: (1) implement, maintain and monitor Engineering Control systems; (2) prevent future exposure to remaining contamination; and, (3) limit the use and development of the site to restricted commercial

and industrial uses only. Adherence to these ICs on the site is required by the Environmental Easement and will be implemented under this SMP. ICs identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement. The IC boundaries are the same as the legal site boundaries as shown on Figure 2. These ICs are:

- The property may be used for: restricted commercial and industrial use;
- All ECs must be operated and maintained as specified in this SMP;
- All ECs must be inspected at a frequency and in a manner defined in the SMP.
- The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.
- Data and information pertinent to site management must be reported at the frequency and in a manner as defined in this SMP;
- All future activities that will disturb remaining contaminated material must be conducted in accordance with this SMP;
- Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in this SMP;
- Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical component of the remedy shall be performed as defined in this SMP: and
- Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner and tenant/occupant to assure compliance with the restrictions identified by the Environmental Easement.

3.3 Engineering Controls

3.3.1 Soil Cover System

Exposure to remaining contamination at the site is prevented by a soil cover system placed over portions of the site. This cover system is comprised of demarcation fabric and a minimum of 12 inches of clean soil. Figure 5 presents the location of the cover system and applicable demarcation layers. Figure 5 includes surveyed results of both the horizontal and vertical location of the demarcation fabric and cover soils. The Excavation Work Plan (EWP) provided in Appendix C outlines the procedures required to be implemented in the event the soil cover system is breached, penetrated or temporarily removed, and any underlying remaining contamination is disturbed. Procedures for the inspection of this soil cover are provided in the Monitoring Plan included in Section 4.0 of this SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and associated Community Air Monitoring Plan (CAMP) prepared for the site. Prior to commencement of any intrusive work that breaches the demarcation layer, the contractor shall prepare for NYSDEC approval, a HASP and Site specific CAMP that is in current compliance with NYSDEC DER-10, and 29 CFR 1910, 29 CFR 1926, and all other applicable Federal, State and local regulations. Any intrusive work that impacts soil cover layer but does not impact the demarcation layer, will not trigger this SMP as long as a minimum of 12 inches of cover is restored following construction.

3.3.2 <u>Criteria for Completion of Remediation</u>

Generally, remedial processes are considered completed when monitoring indicates that the remedy has achieved the remedial action objectives identified by the decision document. The framework for determining when remedial processes are complete is provided in Section 6.6 of NYSDEC DER-10.

3.3.2.1 – Soil Cover System

The soil cover system is a permanent control and the quality and integrity of this system will be inspected at defined, regular intervals in accordance with this SMP in perpetuity.

4.0 MONITORING PLAN

4.1 General

This Monitoring Plan describes the measures for evaluating the overall performance and effectiveness of the remedy. This Monitoring Plan may only be revised with the approval of the NYSDEC.

This Monitoring Plan describes the methods to be used for:

- Evaluating site information periodically to confirm that the remedy continues to be effective in protecting public health and the environment;
- To adequately address these issues, this Monitoring Plan provides information on:
- Inspection and maintenance requirements for the surface cover system; and
- Annual inspection and periodic certification.

Reporting requirements are provided in Section 7.0 of this SMP.

4.2 Site – Wide Inspection

Site-wide inspections will be performed at a minimum of once per year. Modification to the frequency or duration of the inspections will require approval from the NYSDEC. Site-wide inspections will also be performed after all severe weather conditions that may affect ECs or monitoring devices. During these inspections, an inspection form will be completed as provided in Appendix D – Site Management Forms. The form will compile sufficient information to assess the following:

- Compliance with all ICs, including site usage;
- An evaluation of the condition and continued effectiveness of ECs;
- General site conditions at the time of the inspection;

- The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection; and
- Confirm that site records are up to date.

Inspection of the surface cover system installed at the site will be conducted. In most areas, the cover system will be overlain by pavement or other surface uses. As long as the pavement or other surface use is in good condition, the integrity of the cover system will be presumed. A comprehensive site-wide inspection will be conducted and documented according to the SMP schedule, regardless of the frequency of the Periodic Review Report. The inspections will determine and document the following:

- Whether ECs continue to perform as designed;
- If these controls continue to be protective of human health and the environment;
- Compliance with requirements of this SMP and the Environmental Easement; and
- If site records are complete and up to date.

Reporting requirements are outlined in Section 7.0 of this plan.

Inspections will also be performed in the event of an emergency. If an emergency, such as a natural disaster or an unforeseen failure of any of the ECs occurs that reduces or has the potential to reduce the effectiveness of ECs in place at the site, verbal notice to the NYSDEC must be given by noon of the following day. In addition, an inspection of the site will be conducted by a qualified environmental professional, as determined by the NYSDEC, within 5 days of the event to verify the effectiveness of the IC/ECs implemented at the site. Written confirmation must be provided to the NYSDEC within 7 days of the event that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.

5.0 OPERATION AND MAINTENANCE PLAN

5.1 General

The remedy does not rely on any mechanical systems, such as groundwater treatment systems, sub-slab depressurization systems or air sparge/soil vapor extractions systems to protect public health and the environment. Likewise, although areas of the site will be developed above the cover system with the additional cover including pavement, sidewalks or buildings, those improvements are not considered to be part of the remedy. Therefore, the operation and maintenance of such components is not included in this SMP.

5.2 Soil Cover Performance Criteria

The remedy involves the maintenance and periodic inspection of an engineered cover system consisting a demarcation layer and clean soil in designated areas of the site as shown in Figure 5. The periodic inspections will be completed to document the EC's are being maintained and when necessary to ensure its effectiveness as a soil cover to potential exposure to remaining contamination. Maintenance, repair or other disturbances to the soil cover system will be performed in accordance with application sections of Appendix C - Excavation Plan.

6.0 PERIODIC ASSESSMENTS/EVALUATIONS

6.1 Climate Change Vulnerability Assessment

Increases in both the severity and frequency of storms/weather events, an increase in sea level elevations along with accompanying flooding impacts, shifting precipitation patterns and wide temperature fluctuation, resulting from global climactic change and instability, have the potential to significantly impact the performance, effectiveness and protectiveness of a given site. Vulnerability assessments provide information so that the site is prepared for the impacts of the increasing frequency and intensity of severe storms/weather events and associated flooding.

This section provides a summary of vulnerability assessments that will be conducted for the site during periodic assessments, and briefly summarizes the vulnerability of the site and/or engineering controls to severe storms/weather events and associated flooding.

- Flood Plain: The site is not located in a flood plain, low-lying or low-groundwater recharge area.
- Site Drainage and Storm Water Management: There is one area of the site which may flood during severe rain events, this being the stormwater management retention basin. However, due to site soils conducive to high infiltration, flooding would not be likely occur nor damage the basin.
- Erosion: The majority of the site is covered with a building and asphalt paved parking with storm water catch basins which will not be easily susceptible to erosion during periods of severe rain events.
- High Wind: With the trees being cleared from the site for development, high wind should have little to no effect on the surface soil cover system. Light pole bases would not likely be blown over in high wind as the actual light pole would break first.
- Electricity: There will be no effect on the engineering controls (surface cover system) due to power loss and/or dips/surges in voltage during severe weather events, including lightning strikes, and the associated impact on site equipment and operations.
- Spill/Contaminant Release: The surface cover system will not be susceptible to a spill or other contaminant release due to storm-related damage caused by

flooding, erosion, high winds, loss of power etc. as there is no storage of petroleum or chemical products.

6.2 Green Remediation Evaluation

NYSDEC's DER-31 Green Remediation requires that green remediation concepts and techniques be considered during all stages of the remedial program including site management, with the goal of improving the sustainability of the cleanup and summarizing the net environmental benefit of any implemented green technology. This section of the SMP provides a summary of green remediation evaluations to be completed for the site during site management, and as reported in the Periodic Review Report (PRR).

The following items shall be implemented, if possible, in relation to the operation and maintenance of the remedy implemented at the site:

- Waste Generation: Implementing the remedy should not generate waste. If new site development or repairs of infrastructure occurs, there is the potential to generate excess soils that would require special handling and disposal if the soils exceed the PCB SCOs. If development or repairs are planned, they should consider techniques that minimize site disturbance and generation of excess soils. If excess soils are generated, measures should be developed to re-use excess soils on site in accordance with this SMP.
- Concrete: Implement measures to minimize the amount of concrete handling. Crush and place concrete on-site before considering off-site disposal.

Methods proposed or implemented to reduce waste generation, concrete recycling, etc. should be included in the PRR.

6.2.1 Timing of Green Remediation Evaluations

For major remedial system components, green remediation evaluations and corresponding modifications will be undertaken as part of a formal Remedial System

Optimization (RSO), or at any time that the Project Manager feels appropriate, (e.g. during significant maintenance events or in conjunction with storm recovery activities).

Modifications resulting from green remediation evaluations will be routinely implemented and scheduled to occur during planned/routine operation and maintenance activities. Reporting of these modifications will be presented in the PRR.

6.2.2 <u>Metrics and Reporting</u>

As discussed in Section 7.0 and as shown in Appendix D– Site Management Forms a set of metrics has been developed relative to energy usage, solid waste generation, transportation and shipping, water usage, land use and ecosystems will be recorded, as applicable, to facilitate and document consistent implementation of green remediation during site management and to identify corresponding benefits.

7.0. REPORTING REQUIREMENTS

7.1 Site Management Reports

All site management inspection, maintenance and monitoring events will be recorded on the appropriate site management forms provided in Appendix D. These forms are subject to NYSDEC revision.

All applicable inspection forms and other records generated for the site during the reporting period will be provided in electronic format to the NYSDEC in accordance with the requirements of Table 7.1-1 and summarized in the Periodic Review Report.

Table 7.1-1: Schedule of Inspection Reports

Task/Report	Reporting Frequency*		
Periodic Review Report	Annually, or as otherwise determined by the		
I chould keview keport	Department		

^{*} The frequency of events will be conducted as specified until otherwise approved by the NYSDEC.

7.2 Periodic Review Report

A Periodic Review Report (PRR) will be submitted to the Department beginning sixteen (16) months after the Certificate of Completion is issued. After submittal of the initial Periodic Review Report, the next PRR shall be submitted annually to the Department or at another frequency as may be required by the Department. In the event that the site is subdivided into separate parcels with different ownership, a single Periodic Review Report will be prepared that addresses the site described in Appendix B - Environmental Easement. The report will be prepared in accordance with NYSDEC's

DER-10 and submitted within 30 days of the end of each certification period. The report will include:

- Identification, assessment and certification of all ECs/ICs required by the remedy for the site.
- Results of the required annual site inspections and severe condition inspections, if applicable.
- All applicable site management forms and other records generated for the site during the reporting period in the NYSDEC-approved electronic format, if not previously submitted.
- A site evaluation, which includes the following:
 - The compliance of the remedy with the requirements of the site-specific Decision Document;
 - Recommendations regarding any necessary changes to the remedy; and
 - The overall performance and effectiveness of the remedy.

7.2.1 <u>Certification of Institutional and Engineering Controls</u>

Following the last inspection of the reporting period, a Professional Engineer licensed to practice in New York State will prepare, and include in the Periodic Review Report, the following certification as per the requirements of NYSDEC DER-10:

"For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

- The inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction;
- The institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;

- Nothing has occurred that would impair the ability of the control to protect the public health and environment;
- Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;
- Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control;
- *Use of the site is compliant with the environmental easement;*
- The engineering control systems are performing as designed and are effective;
- To the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program and generally accepted engineering practices; and
- The information presented in this report is accurate and complete.

I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as [Owner/Remedial Party] for the site."

The signed certification will be included in the Periodic Review Report.

The Periodic Review Report will be submitted, in electronic format, to the NYSDEC Central Office, Regional Office in which the site is located and the NYSDOH Bureau of Environmental Exposure Investigation. The Periodic Review Report may need to be submitted in hard-copy format, as requested by the NYSDEC project manager.

7.3 Corrective Measures Work Plan

If any component of the remedy is found to have failed, or if the periodic certification cannot be provided due to the failure of an institutional or engineering

control, a Corrective Measures Work Plan will be submitted to the NYSDEC for approval. This plan will explain the failure and provide the details and schedule for performing work necessary to correct the failure. Unless an emergency condition exists, no work will be performed pursuant to the Corrective Measures Work Plan until it has been approved by the NYSDEC.

8.0 REFERENCES

6 NYCRR Part 375, Environmental Remediation Programs. December 14, 2006.

NYSDEC DER-10 – "Technical Guidance for Site Investigation and Remediation". May 3, 2010.

NYSDEC, 1998. Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1. June 1998 (April 2000 addendum).

Report for the Preliminary Site Assessment (PSA) at the Upper Broadway Site prepared by Ecology and Environment Engineering, P.C. (E&E), dated October 2004 (2004 E&E PSA).

Final Closure Report for the Removal and Disposal of Soil Containing PCBs in the Vicinity of Test Pit TP-12, prepared by Malcolm Pirnie, Inc. (MPI), dated March 22, 2005 (2005 MPI Final Closure Report).

October 17 – November 17, 2006 Progress Report prepared by MPI for NYSDEC (2006 MPI Progress Report).

November 20 – December 22, 2006 Progress Report prepared by MPI for NYSDEC (2006 MPI Progress Report).

Final Phase I Report, Former Grand Union Targeted Brownfields Assessment prepared by CDM Federal Programs Corporation, dated December 2010 (2010 CDM Final Phase I Report).

Final Removal Assessment Sampling Trip Report prepared by Weston Solutions, Inc. (Weston), dated April 27, 2012 (2012 Weston Final Removal Assessment).

Removal Site Evaluation for the Former Grand Union Site, Fort Edward, New York prepared by EPA Removal Action Branch, dated May 31, 2012 (2012 EPA Removal Site Evaluation Report).

Phase I Environmental Site Assessment, Former Grand Union Site, 354 Broadway Town of Fort Edward, Washington County, New York, dated October 28, 2012 prepared for the Town of Fort Edward, (2012 Phase I ESA).

Remedial Action Work Plan, Former Grand Union, 354 Broadway, Town of Fort Edward, Washington County, New York, BCP Site No. C558033, dated October 2014 prepared for the Town of Fort Edward & 354 Broadway LLC, (2014 Remedial Action Work Plan)

TABLE 2.5.1-1: TOTAL PCBS IN SOIL ANALYTICAL SUMMARY EXCAVATION AREA A (Sampled 8.17.2015) 354 BROADWAY BCP SITE TOWN OF FORT EDWARD

(Data Not Independently Validated)

Lab Sample ID	Field Sample ID	Test Code	Analyte	Result	Units
AC86567-001	A-B1	PCB-8082	Aroclor (Total)	0.27	mg/Kg
AC86567-001	A-B1	PCB-8082	Aroclor-1248	0.27	mg/Kg
AC86567-001	A-B1	PCB-8082	Aroclor (Total)	0.27	mg/Kg
AC86567-002	A-B2	PCB-8082	Aroclor-1248	0.10	mg/Kg
AC86567-002 AC86567-003	A-B2 A-B3	PCB-8082	Aroclor (Total)	0.10	mg/Kg
AC86567-003	B53-B3CTM #1333	PCB-8082	Aroclor (10tal)	0.33	mg/Kg
AC86567-003 AC86567-004	A-B4	PCB-8082	Aroclor (Total)	0.081	mg/Kg
AC86567-004 AC86567-004	A-B4	PCB-8082	Aroclor-1248	0.081	mg/Kg
AC86567-004 AC86567-005	A-SWA0	PCB-8082	Aroclor (Total)	2.8	
AC86567-005	A-SWA0	PCB-8082	Aroclor (10tal) Aroclor-1248	2.8	mg/Kg
				58 ⁽³⁾	mg/Kg
AC86567-006	A-SWA1	PCB-8082	Aroclor (Total)		mg/Kg
AC86567-006	A-SWA1	PCB-8082	Aroclor-1254	58 ⁽³⁾	mg/Kg
AC86567-007	A-SWB0	PCB-8082	Aroclor (Total)	0.97	mg/Kg
AC86567-007	A-SWB0	PCB-8082	Aroclor-1254	0.97	mg/Kg
AC86567-008	A-SWB1	PCB-8082	Aroclor (Total)	18 ⁽³⁾	mg/Kg
AC86567-008	A-SWB1	PCB-8082	Aroclor-1254	18 ⁽³⁾	mg/Kg
AC86567-010	A-SWC0	PCB-8082	Aroclor (Total)	0.075	mg/Kg
AC86567-010	A-SWC0	PCB-8082	Aroclor-1248	0.075	mg/Kg
AC86567-013	A-SWC1	PCB-8082	Aroclor (Total)	7.6	mg/Kg
AC86567-013	A-SWC1	PCB-8082	Aroclor-1254	7.6	mg/Kg
AC86567-014	FD081715-1 ⁽¹⁾	PCB-8082	Aroclor (Total)	9.6	mg/Kg
AC86567-014	FD081715-1 ⁽¹⁾	PCB-8082	Aroclor-1248	9.6	mg/Kg
AC86567-015	A-SWD0	PCB-8082	Aroclor (Total)	0.34	mg/Kg
AC86567-015	A-SWD0	PCB-8082	Aroclor-1248	0.34	mg/Kg
AC86567-016	A-SWD1	PCB-8082	Aroclor (Total)	0.25	mg/Kg
AC86567-016	A-SWD1	PCB-8082	Aroclor-1248	0.25	mg/Kg
AC86567-017	A-SWE0	PCB-8082	Aroclor (Total)	0.74	mg/Kg
AC86567-017	A-SWE0	PCB-8082	Aroclor-1248	0.74	mg/Kg
AC86567-018	A-SWE1	PCB-8082	Aroclor (Total)	0.15	mg/Kg
AC86567-018	A-SWE1	PCB-8082	Aroclor-1248	0.15	mg/Kg
AC86567-019	A-SWF0	PCB-8082	Aroclor (Total)	3.4	mg/Kg
AC86567-019	A-SWF0	PCB-8082	Aroclor-1254	3.4	mg/Kg
AC86567-020	A-SWF1	PCB-8082	Aroclor (Total)	2.9	mg/Kg
AC86567-020	A-SWF1	PCB-8082	Aroclor-1254	2.9	mg/Kg
AC86567-021	A-SWG0	PCB-8082	Aroclor (Total)	0.74	mg/Kg
AC86567-021	A-SWG0	PCB-8082	Aroclor-1254	0.74	mg/Kg
AC86567-022	A-SWG1	PCB-8082	Aroclor (Total)	12 ⁽³⁾	mg/Kg
AC86567-022	A-SWG1	PCB-8082	Aroclor-1254	12 ⁽³⁾	mg/Kg
AC86567-024	A-B5	PCB-8082	Aroclor (Total)	0.91	mg/Kg
AC86567-024	A-B5	PCB-8082	Aroclor-1248	0.91	mg/Kg
AC86567-027	A-B6	PCB-8082	Aroclor (Total)	0.53	mg/Kg
AC86567-027	A-B6	PCB-8082	Aroclor-1248	0.53	mg/Kg
AC86567-028	FD081715-2 ⁽²⁾	PCB-8082	Aroclor (Total)	0.52	mg/Kg
AC86567-028	FD081715-2 ⁽²⁾	PCB-8082	Aroclor-1248	0.52	mg/Kg
AC86567-029	A-B7	PCB-8082	Aroclor (Total)	3.6	mg/Kg

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TABLE 2.5.1-1: TOTAL PCBS IN SOIL ANALYTICAL SUMMARY EXCAVATION AREA A (Sampled 8.17.2015) 354 BROADWAY BCP SITE TOWN OF FORT EDWARD

(Data Not Independently Validated)

AC86567-029	A-B7	PCB-8082	Aroclor-1254	3.6	mg/Kg
Lab Sample ID	Field Sample ID	Test Code	Analyte	Result	Units
AC86567-030	A-B8	PCB-8082	Aroclor (Total)	0.61	mg/Kg
AC86567-030	A-B8	PCB-8082	Aroclor-1254	0.61	mg/Kg
AC86567-031	A-B9	PCB-8082	Aroclor (Total)	0.04	mg/Kg
AC86567-031	A-B9	PCB-8082	Aroclor-1254	0.040	mg/Kg
AC86567-032	A-B10	PCB-8082	Aroclor (Total)	3.1	mg/Kg
AC86567-032	A-B10	PCB-8082	Aroclor-1254	3.1	mg/Kg
AC86567-033	A-B11	PCB-8082	Aroclor (Total)	0.065	mg/Kg
AC86567-033	A-B11	PCB-8082	Aroclor-1248	0.065	mg/Kg
AC86567-034	A-B12	PCB-8082	Aroclor (Total)	2.5	mg/Kg
AC86567-034	A-B12	PCB-8082	Aroclor-1254	2.5	mg/Kg
AC86567-035	A-B13	PCB-8082	Aroclor (Total)	2.2	mg/Kg
AC86567-035	A-B13	PCB-8082	Aroclor-1254	2.2	mg/Kg
AC86567-036	A-B14	PCB-8082	Aroclor (Total)	0.084	mg/Kg
AC86567-036	A-B14	PCB-8082	Aroclor-1254	0.084	mg/Kg

PCB concentrations in bold have exceeded the criteria of 10 ppm for PCBs in subsurface soil.

PCB concentrations in bold and highlighted have exceeded the TSCA criteria of ≥50 ppm.

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⁽¹⁾ FD081715-1 is a field replicate of A-SWC1

⁽²⁾ FD 081715-2 is a field replicate of A-B6

⁽³⁾ This location were excavated further and was not left on-site.

TABLE 2.5.1-2: TOTAL PCBS IN SOIL ENDPOINT SAMPLING RESULTS EXCAVATION AREA B (Sampled 8.12-13.2015) 354 BROADWAY BCP SITE TOWN OF FORT EDWARD (Validated Data)*

	T	Sampling Depth		ı	
Lab Sample ID	Field Sample ID	(Feet BGS)	Analyte	Result	Units
AC86512-002	B-B1*	3	Aroclor (Total)	0.14	mg/Kg
AC86512-005	B-B2*	3	Aroclor (Total)	0.084(J)	mg/Kg
AC86512-006	FD081215-1 ^{(1)*}	3	Aroclor (Total)	0.07	mg/Kg
AC86512-007	B-B3*	3	Aroclor (Total)	0.038(J)	mg/Kg
AC86512-008	B-B4*	3	Aroclor (Total)	0.18(J)	mg/Kg
AC86512-009	B-B5*	3	Aroclor (Total)	ND	mg/Kg
AC86512-010	B-SWA0*	0-0.25	Aroclor (Total)	0.054	mg/Kg
AC86512-011	B-SWA1*	1-1.25	Aroclor (Total)	ND	mg/Kg
AC86512-012	B-SWA2*	2-2.25	Aroclor (Total)	7.2	mg/Kg
AC86512-013	B-SWB0*	0-0.25	Aroclor (Total)	0.69	mg/Kg
AC86512-014	B-SWB1*	1-1.25	Aroclor (Total)	0.32	mg/Kg
AC86512-015	B-SWB2*	2-2.25	Aroclor (Total)	0.22	mg/Kg
AC86512-016	B-SWC0*	0-0.25	Aroclor (Total)	0.3	mg/Kg
AC86512-017	B-SWC1*	1-1.25	Aroclor (Total)	0.059(J)	mg/Kg
AC86512-018	B-SWC2*	2-2.25	Aroclor (Total)	0.13	mg/Kg
AC86512-019	B-SWD0*	0-0.25	Aroclor (Total)	0.47	mg/Kg
AC86512-020	B-SWD1*	1-1.25	Aroclor (Total)	ND	mg/Kg
AC86512-021	B-SWD2*	2-2.25	Aroclor (Total)	1.7	mg/Kg
AC86512-022	B-SWE0*	0-0.25	Aroclor (Total)	ND	mg/Kg
AC86512-023	B-SWE1*	1-1.25	Aroclor (Total)	0.34	mg/Kg
AC86512-024	B-SWE2*	2-2.25	Aroclor (Total)	5.2	mg/Kg
AC86512-026	B-B6*	3	Aroclor (Total)	0.25	mg/Kg
AC86512-029	B-B7*	3	Aroclor (Total)	0.15	mg/Kg
AC86512-030	FD081315-1 ^{(2)*}	3	Aroclor (Total)	0.047	mg/Kg
AC86512-031	B-B8*	3	Aroclor (Total)	0.11	mg/Kg
AC86512-032	B-B9*	3	Aroclor (Total)	0.19	mg/Kg
AC86512-033	B-B10*	3	Aroclor (Total)	ND	mg/Kg
AC86512-034	B-B11*	3	Aroclor (Total)	0.19	mg/Kg
AC86512-035	B-B12*	3	Aroclor (Total)	ND	mg/Kg
AC86512-036	B-B13*	3	Aroclor (Total)	ND	mg/Kg
AC86512-037	B-B14*	3	Aroclor (Total)	0.21	mg/Kg
AC86512-038	B-B15*	3	Aroclor (Total)	0.14	mg/Kg
AC86512-039	B-B16*	3	Aroclor (Total)	ND	mg/Kg
AC86511-001	B-B17*	3	Aroclor (Total)	ND	mg/Kg
AC86512-040	B-SWF0*	0-0.25	Aroclor (Total)	ND	mg/Kg
AC86512-041	B-SWF1*	1-1.25	Aroclor (Total)	0.089	mg/Kg
AC86512-042	B-SWF2*	2-2.25	Aroclor (Total)	0.82	mg/Kg
AC86512-043	B-SWG0*	0-0.25	Aroclor (Total)	0.05	mg/Kg
AC86512-044	B-SWG1*	1-1.25	Aroclor (Total)	0.11	mg/Kg
AC86512-045	B-SWG2*	2-2.25	Aroclor (Total)	0.1	mg/Kg
AC86512-046	B-SWH0*	0-0.25	Aroclor (Total)	0.039	mg/Kg
AC86512-047	B-SWH1*	1-1.25	Aroclor (Total)	0.2	mg/Kg
AC86512-048	B-SWH2*	2-2.25	Aroclor (Total)	2.9	mg/Kg
AC86512-050	B-SWI0*	0-0.25	Aroclor (Total)	0.11	mg/Kg
AC86512-051	B-SWI1*	1-1.25	Aroclor (Total)	0.066	mg/Kg

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TABLE 2.5.1-2: TOTAL PCBS IN SOIL ENDPOINT SAMPLING RESULTS EXCAVATION AREA B (Sampled 8.12-13.2015) 354 BROADWAY BCP SITE TOWN OF FORT EDWARD (Validated Data)*

		Sampling Depth			
Lab Sample ID	Field Sample ID	(Feet BGS)	Analyte	Result	Units
AC86512-054	B-SWI2*	2-2.25	Aroclor (Total)	0.2(J)	mg/Kg
AC86512-055	FD081315-2 ^{(3)*}	2-2.25	Aroclor (Total)	0.5(J)	mg/Kg
AC86512-056	B-SWJ0*	0-0.25	Aroclor (Total)	ND	mg/Kg
AC86512-057	B-SWJ1*	1-1.25	Aroclor (Total)	0.54	mg/Kg
AC86512-058	B-SWJ2*	2-2.25	Aroclor (Total)	0.071	mg/Kg
AC86512-059	B-SWK0*	0-0.25	Aroclor (Total)	0.53	mg/Kg
AC86512-060	B-SWK1*	1-1.25	Aroclor (Total)	0.19	mg/Kg
AC86512-061	B-SWK2*	2-2.25	Aroclor (Total)	0.17	mg/Kg
AC86512-062	B-SWL0*	0-0.25	Aroclor (Total)	0.12	mg/Kg
AC86512-063	B-SWL1*	1-1.25	Aroclor (Total)	0.12	mg/Kg
AC86512-064	B-SWL2*	2-2.25	Aroclor (Total)	1.3	mg/Kg
AC86512-065	B-SWM0*	0-0.25	Aroclor (Total)	0.15	mg/Kg
AC86512-066	B-SWM1*	1-1.25	Aroclor (Total)	0.063	mg/Kg
AC86512-067	B-SWM2*	2-2.25	Aroclor (Total)	1.5	mg/Kg
AC86512-068	B-SWN0*	0-0.25	Aroclor (Total)	0.1	mg/Kg
AC86512-069	B-SWN1*	1-1.25	Aroclor (Total)	0.13	mg/Kg
AC86512-070	B-SWN2*	2-2.25	Aroclor (Total)	6.3(J)	mg/Kg

PCB concentrations in bold have exceeded the criteria of 10 ppm for PCBs in subsurface soil.

PCB concentrations in bold and highlighted have exceeded the TSCA criteria of ≥50 ppm.

^{*} Field Sample ID's containing an asterix (*) have been independently validated.

⁽¹⁾ FD081215-1 is a field replicate of B-B2

⁽²⁾ FD081315-1 is a field replicate of B-B7

⁽³⁾ FD081315-2 is a field replicate of B-SWI2

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC86512-071	C-B1	Aroclor (Total)	15	mg/Kg
AC86512-072	C-B2	Aroclor (Total)	4.3	mg/Kg
AC86512-073	C-B3	Aroclor (Total)	3400	mg/Kg
AC86512-075	C-SWA0*	Aroclor (Total)	1.6	mg/Kg
AC86512-078	C-SWA1*	Aroclor (Total)	1.7J	mg/Kg
AC86512-079	FD081315-3 ^{(1)*}	Aroclor (Total)	2.9J	mg/Kg
AC86512-080	C-SWA2*	Aroclor (Total)	3.9	mg/Kg
AC86512-081	C-SWA3*	Aroclor (Total)	4	mg/Kg
AC86512-082	C-SWB0*	Aroclor (Total)	4	mg/Kg
AC86512-083	C-SWB1*	Aroclor (Total)	ND	mg/Kg
AC86512-084	C-SWB2*	Aroclor (Total)	0.45	mg/Kg
AC86512-085	C-SWB3*	Aroclor (Total)	0.72	mg/Kg
AC86512-086	C-SWC0*	Aroclor (Total)	0.95	mg/Kg
AC86512-087	C-SWC1*	Aroclor (Total)	0.76	mg/Kg
AC86512-088	C-SWC2*	Aroclor (Total)	0.037	mg/Kg
AC86512-089	C-SWC3*	Aroclor (Total)	0.12	mg/Kg
AC86512-090	C-SWD0*	Aroclor (Total)	15	mg/Kg
AC86512-091	C-SWD1*	Aroclor (Total)	0.066	mg/Kg
AC86512-092	C-SWD2	Aroclor (Total)	ND	mg/Kg
AC86512-093	C-SWD3*	Aroclor (Total)	1.4	mg/Kg
AC86512-094	C-SWE0	Aroclor (Total)	1800	mg/Kg
AC86512-095	C-SWE1	Aroclor (Total)	4200	mg/Kg
AC86512-096	C-SWE2	Aroclor (Total)	2200	mg/Kg
AC86512-097	C-SWE3	Aroclor (Total)	2300	mg/Kg
AC86512-098	C-SWF0*	Aroclor (Total)	13	mg/Kg
AC86512-101	C-SWF1*	Aroclor (Total)	0.54J	mg/Kg
AC86512-102	C-SWF2*	Aroclor (Total)	ND	mg/Kg
AC86512-103	C-SWF3*	Aroclor (Total)	0.088	mg/Kg
AC86512-104	FD081315-4 ^{(2)*}	Aroclor (Total)	0.2J	mg/Kg
AC86512-105	C-SWG0*	Aroclor (Total)	0.39	mg/Kg
AC86512-106	C-SWG1*	Aroclor (Total)	0.18	mg/Kg
AC86512-108	C-SWG3*	Aroclor (Total)	0.053	mg/Kg
AC86512-110	C-SWH0*	Aroclor (Total)	6.1	mg/Kg
AC86512-111	C-SWH1*	Aroclor (Total)	0.11	mg/Kg
AC86512-112	C-SWH2*	Aroclor (Total)	3.4	mg/Kg
AC86512-113	C-SWH3*	Aroclor (Total)	0.052	mg/Kg
AC86512-114	C-SWI0	Aroclor (Total)	310	mg/Kg
AC86512-115	C-SWI1	Aroclor (Total)	2100	mg/Kg
AC86512-116	C-SWI2	Aroclor (Total)	1600	mg/Kg
AC86512-117	C-SWI3	Aroclor (Total)	18	mg/Kg
AC86512-118	C-SWJ0	Aroclor (Total)	750	mg/Kg
AC86512-119	C-SWJ1	Aroclor (Total)	45	mg/Kg
AC86512-120	C-SWJ2	Aroclor (Total)	4.7	mg/Kg
AC86512-121	C-SWJ3	Aroclor (Total)	280	mg/Kg
AC86512-122	C-SWK0	Aroclor (Total)	16	mg/Kg
AC86512-123	C-SWK1	Aroclor (Total)	0.071	mg/Kg

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC86512-124	C-SWK2	Aroclor (Total)	0.036	mg/Kg
AC86512-125	C-SWK3*	Aroclor (Total)	ND	mg/Kg
AC86512-126	C-SWL0	Aroclor (Total)	7.4	mg/Kg
AC86512-127	C-SWL1*	Aroclor (Total)	0.35	mg/Kg
AC86512-128	C-SWL2*	Aroclor (Total)	ND	mg/Kg
AC86512-129	C-SWL3*	Aroclor (Total)	0.034	mg/Kg
AC86679-001	C-SWMO*	Aroclor (Total)	5.1	mg/Kg
AC86679-001	C-SWM1*	Aroclor (Total)	0.95	mg/Kg
AC86679-002 AC86679-003	C-SWM2*	Aroclor (Total)	ND	mg/Kg
AC86679-003	C-SWM3*	Aroclor (Total)	ND	mg/Kg
AC86679-005	C-SWM4*	Aroclor (Total)	ND	mg/Kg
AC86679-005 AC86679-006	C-SWM5*	Aroclor (Total)	ND	
AC86679-007	C-SWM6*	Aroclor (Total)	0.12	mg/Kg
AC86679-007	C-SWN0*	Aroclor (Total)	15	mg/Kg
AC86679-008 AC86679-009	C-SWN1*	Aroclor (Total)	2.7	mg/Kg
AC86679-009 AC86679-010	C-SWN2*	Aroclor (Total)	0.036	mg/Kg
	C-SWN3*	Aroclor (Total)	0.036 ND	mg/Kg
AC86679-011 AC86679-012	C-SWN4*	Aroclor (Total)	0.04	mg/Kg mg/Kg
AC86679-012 AC86679-013	C-SWN5*	Aroclor (Total)	ND	
	C-SWN6*	, ,	0.15	mg/Kg
AC86679-014 AC86679-015	C-SWO0	Aroclor (Total)	190	mg/Kg
AC86679-015 AC86679-016	C-SW01	Aroclor (Total)	180	mg/Kg
AC86679-016 AC86679-017	C-SWO2	Aroclor (Total)	190	mg/Kg
AC86679-017 AC86679-018	C-SWO3	Aroclor (Total) Aroclor (Total)	60	mg/Kg
AC86679-018 AC86679-019	C-SWO4	Aroclor (Total)	5.3	mg/Kg
AC86679-019	C-SWO5	Aroclor (Total)	2.9	mg/Kg mg/Kg
AC86679-020 AC86679-021	C-SW06	Aroclor (Total)	0.9	mg/Kg
AC86679-024	C-B4*	Aroclor (Total)	25J	
	FD082415-1 ^{(3)*}	, ,		mg/Kg
AC86679-025		Aroclor (Total)	11J	mg/Kg
AC86679-027	C-B5* C-B6*	Aroclor (Total)	0.72	mg/Kg
AC86679-028	C-B6 C-B7*	Aroclor (Total)	7.9 1.5J	mg/Kg
AC86679-031		Aroclor (Total)		mg/Kg
AC86679-032	FD082415-2 ^{(4)*}	Aroclor (Total)	0.47J	mg/Kg
AC86679-033	C-B8*	Aroclor (Total)	0.7	mg/Kg
AC86679-035	C-SWP4	Aroclor (Total)	68	mg/Kg
AC86679-036	C-SWP5	Aroclor (Total)	9.2	mg/Kg
AC86679-037	C-SWP6	Aroclor (Total)	55	mg/Kg
AC86679-038	C-SWQ4	Aroclor (Total)	1200	mg/Kg
AC86679-039	C-SWQ5	Aroclor (Total)	390	mg/Kg
AC86679-040	C-SWQ6	Aroclor (Total)	1.8	mg/Kg
AC86679-041	C-SWR4	Aroclor (Total)	1	mg/Kg
AC86679-042	C-SWR5	Aroclor (Total)	1.3	mg/Kg
AC86679-043	C-SWR6	Aroclor (Total)	0.36	mg/Kg
AC86679-044	C-SWS4*	Aroclor (Total)	0.095	mg/Kg
AC86679-045	C-SWS5*	Aroclor (Total)	0.051	mg/Kg
AC86679-046	C-SWS6*	Aroclor (Total)	0.45	mg/Kg

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC86679-047	C-B9	Aroclor (Total)	500	mg/Kg
AC86679-048	C-B9 C-B10	Aroclor (Total)	3780	mg/Kg
AC86679-049	C-B10	Aroclor (Total)	760	mg/Kg
AC86679-050	C-B12	Aroclor (Total)	820	mg/Kg
AC86679-051	C-SWT2	Aroclor (Total)	7.8	mg/Kg
AC86679-051	C-SWT3	Aroclor (Total)	26	mg/Kg
AC86679-053	C-SWU2	Aroclor (Total)	1.5	mg/Kg
AC86679-054	C-SWU3	Aroclor (Total)	21	mg/Kg
AC86679-055	C-SWV0	Aroclor (Total)	570	mg/Kg
AC86679-056	C-SWV1	Aroclor (Total)	860	mg/Kg
AC86679-057	C-SWW0	Aroclor (Total)	100	mg/Kg
AC86679-058	C-SWW1	Aroclor (Total)	220	mg/Kg
AC86679-059	C-SWW1	Aroclor (Total)	64	
AC86679-059 AC86679-060	C-SWW3	Aroclor (Total)	7.7	mg/Kg
AC86790-002	C-SWX4*		ND	mg/Kg
AC86790-002 AC86790-005	C-SWX5*	Aroclor (Total) Aroclor (Total)	ND ND	mg/Kg mg/Kg
	FD083115-1 ⁽⁵⁾ *	,		
AC86790-006		Aroclor (Total)	ND	mg/Kg
AC86790-007	C-SWX6*	Aroclor (Total)	1	mg/Kg
AC86790-008	C-SWY4	Aroclor (Total)	13	mg/Kg
AC86790-009	C-SWY5	Aroclor (Total)	0.17	mg/Kg
AC86790-010	C-SWY6	Aroclor (Total)	ND	mg/Kg
AC86790-011	C-SWZ4	Aroclor (Total)	11	mg/Kg
AC86790-012	C-SWZ5	Aroclor (Total)	12	mg/Kg
AC86790-013	C-SWZ6	Aroclor (Total)	66	mg/Kg
AC86790-014	C-SWAA4	Aroclor (Total)	0.074	mg/Kg
AC86790-015	C-SWAA5	Aroclor (Total)	0.81	mg/Kg
AC86790-016	C-SWAA6	Aroclor (Total)	1.5	mg/Kg
AC86790-017	C-SWBB4	Aroclor (Total)	27	mg/Kg
AC86790-018	C-SWBB5	Aroclor (Total)	2.7	mg/Kg
AC86790-019	C-SWBB6	Aroclor (Total)	1700	mg/Kg
AC86790-020	C-SWCC4	Aroclor (Total)	280	mg/Kg
AC86790-021	C-SWCC5	Aroclor (Total)	260	mg/Kg
AC86790-022	C-SWCC6	Aroclor (Total)	150	mg/Kg
AC86790-023	C-SWDD4	Aroclor (Total)	340	mg/Kg
AC86790-024	C-SWDD5	Aroclor (Total)	990	mg/Kg
AC86790-025	C-SWDD6	Aroclor (Total)	1200	mg/Kg
AC86790-027	C-SWEE4	Aroclor (Total)	770	mg/Kg
AC86790-030	C-SWEE5	Aroclor (Total)	1600	mg/Kg
AC86790-031	FD083115-2 ⁽⁶⁾	Aroclor (Total)	1500	mg/Kg
AC86790-032	C-SWEE6	Aroclor (Total)	1200	mg/Kg
AC86790-033	C-SWFF0	Aroclor (Total)	52	mg/Kg
AC86790-034	C-SWFF1	Aroclor (Total)	210	mg/Kg
AC86790-035	C-SWFF2	Aroclor (Total)	650	mg/Kg
AC86790-036	C-SWFF3	Aroclor (Total)	530	mg/Kg
AC86790-037	C-SWFF4	Aroclor (Total)	2.5	mg/Kg
AC86790-038	C-SWGG0	Aroclor (Total)	230	mg/Kg

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC86790-039	C-SWGG1	Aroclor (Total)	550	mg/Kg
AC86790-040	C-SWGG2	Aroclor (Total)	110	mg/Kg
AC86790-041	C-SWGG3	Aroclor (Total)	1.2	mg/rtg
AC86790-042	C-SWGG4	Aroclor (Total)	0.31	mg/Kg
AC86790-043	C-SWHH0	Aroclor (Total)	0.04	mg/Kg
AC86790-044	C-SWHH1	Aroclor (Total)	ND	mg/Kg
AC86790-045	C-SWHH2	Aroclor (Total)	0.43	mg/Kg
AC86790-046	C-SWJJ0*	Aroclor (Total)	5.1	mg/Kg
AC86790-047	C-SWJJ1*	Aroclor (Total)	ND	mg/Kg
AC86790-048	C-SWJJ2*	Aroclor (Total)	0.047	mg/Kg
AC86790-049	C-SWKK0*	Aroclor (Total)	0.15	mg/Kg
AC86790-050	C-SWKK1*	Aroclor (Total)	ND	mg/Kg
AC86790-051	C-SWKK2*	Aroclor (Total)	ND	mg/Kg
AC86790-052	C-B13	Aroclor (Total)	57	mg/Kg
AC86790-053	C-B14	Aroclor (Total)	5	mg/Kg
AC86790-054	C-B15	Aroclor (Total)	34	mg/Kg
AC86790-055	C-B16	Aroclor (Total)	1200	mg/Kg
AC86790-056	C-B17	Aroclor (Total)	520	mg/Kg
AC86790-057	C-B18	Aroclor (Total)	2.4	mg/Kg
AC86790-057	C-B19	Aroclor (Total)	270	mg/Kg
AC86790-059	C-B19	Aroclor (Total)	67	mg/Kg
AC86790-059 AC86790-060	C-SWII0*	Aroclor (Total)	1.6	mg/Kg
AC86790-060 AC86790-061	C-SWII1*	Aroclor (Total)	1.6	mg/Kg
AC86790-064	C-SWII2*	Aroclor (Total)	0.21	
	FD083115-3 ^{(7)*}	,		mg/Kg
AC86790-065		Aroclor (Total)	0.22	mg/Kg
AC86922-002	C-B26	Aroclor (Total)	100	mg/Kg
AC86922-005	C-B27	Aroclor (Total)	350	mg/Kg
AC86922-006	FD9915-1 ⁽⁸⁾	Aroclor (Total)	400	mg/Kg
AC86922-007	C-B28	Aroclor (Total)	360	mg/Kg
AC86922-008	C-B29*	Aroclor (Total)	7.1	mg/Kg
AC86922-009	C-B30*	Aroclor (Total)	0.14	mg/Kg
AC86922-010	C-B31	Aroclor (Total)	60	mg/Kg
AC86922-011	C-B32	Aroclor (Total)	82	mg/Kg
AC86922-012	C-B33	Aroclor (Total)	4900	mg/Kg
AC86922-013	C-B34	Aroclor (Total)	35	mg/Kg
AC86922-014	C-B35*	Aroclor (Total)	12	mg/Kg
AC86922-015	C-B36	Aroclor (Total)	37	mg/Kg
AC86922-016	C-B37	Aroclor (Total)	9.1	mg/Kg
AC86922-017	C-SWRR7	Aroclor (Total)	3.8	mg/Kg
AC86922-018	C-SWRR8	Aroclor (Total)	0.31	mg/Kg
AC86922-019	C-SWRR9	Aroclor (Total)	0.91	mg/Kg
AC86922-020	C-SWSS7	Aroclor (Total)	8.8	mg/Kg
AC86922-021	C-SWSS8	Aroclor (Total)	12	mg/Kg
AC86922-022	C-SWSS9	Aroclor (Total)	4.3	mg/Kg
AC86922-024	C-SWTT7	Aroclor (Total)	660	mg/Kg
AC86922-027	C-SWTT8	Aroclor (Total)	660	mg/Kg

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC86922-028	FD9915-2 ⁽⁹⁾	Aroclor (Total)	690	mg/Kg
AC86922-029	C-SWTT9	Aroclor (Total)	1100	mg/Kg
AC86922-030	C-SWUU7	Aroclor (Total)	2.7	mg/Kg
AC86922-031	C-SWUU8	Aroclor (Total)	420	mg/Kg
AC86922-032	C-SWUU9	Aroclor (Total)	53	mg/Kg
AC86922-033	C-SWVV7	Aroclor (Total)	960	mg/Kg
AC86922-034	C-SWVV8	Aroclor (Total)	530	mg/Kg
AC86922-035	C-SWVV9	Aroclor (Total)	1200	mg/Kg
AC86922-036	C-SWWW0	Aroclor (Total)	330	mg/Kg
AC86922-037	C-SWWW1	Aroclor (Total)	95	mg/Kg
AC86922-038	C-SWWW2	Aroclor (Total)	320	mg/Kg
AC86922-039	C-SWXX0	Aroclor (Total)	710	mg/Kg
AC86922-040	C-SWXX1	Aroclor (Total)	260	mg/Kg
AC86922-041	C-SWXX2	Aroclor (Total)	11	mg/Kg
AC86922-042	C-SWYY0	Aroclor (Total)	130	mg/Kg
AC86922-043	C-SWYY1	Aroclor (Total)	310	mg/Kg
AC86922-044	C-SWYY2	Aroclor (Total)	44	mg/Kg
AC86922-045	C-SWYY3	Aroclor (Total)	150	mg/Kg
AC86922-046	C-SWZZ0	Aroclor (Total)	240	mg/Kg
AC86922-047	C-SWZZ1	Aroclor (Total)	8.7	mg/Kg
AC86922-048	C-SWZZ2	Aroclor (Total)	22	mg/Kg
AC86922-049	C-SWZZ3	Aroclor (Total)	33	mg/Kg
AC86922-051	C-SWAAA0	Aroclor (Total)	810	mg/Kg
AC86922-054	C-SWAAA1	Aroclor (Total)	750	mg/Kg
AC86922-055	FD9915-3 ^{(10)*}	Aroclor (Total)	1100	mg/Kg
AC86922-056	C-SWBBB0*	Aroclor (Total)	16	mg/Kg
AC86922-057	C-SWBBB1*	Aroclor (Total)	0.38	mg/Kg
AC86922-058	C-SWCCC7*	Aroclor (Total)	0.33	mg/Kg
AC86922-059	C-SWCCC8*	Aroclor (Total)	0.048	mg/Kg
AC86922-060	C-SWCCC9*	Aroclor (Total)	ND	mg/Kg
AC86922-061	C-SWDDD7*	Aroclor (Total)	1.8	mg/Kg
AC86922-062	C-SWDDD8*	Aroclor (Total)	0.27	mg/Kg
AC86922-063	C-SWDDD9*	Aroclor (Total)	0.64	mg/Kg
AC86922-064	C-SWEEE7*	Aroclor (Total)	4.2	mg/Kg
AC86922-065	C-SWEEE8*	Aroclor (Total)	0.29	mg/Kg
AC86922-066	C-SWEEE9*	Aroclor (Total)	3.2	mg/Kg
AC86922-067	C-SWFFF7*	Aroclor (Total)	0.58	mg/Kg
AC86922-068	C-SWFFF8*	Aroclor (Total)	0.19	mg/Kg
AC86922-069	C-SWFFF9*	Aroclor (Total)	0.62	mg/Kg
AC86922-070	C-SWGGG7*	Aroclor (Total)	0.11	mg/Kg
AC86922-071	C-SWGGG8*	Aroclor (Total)	ND	mg/Kg
AC86922-072	C-SWGGG9*	Aroclor (Total)	ND	mg/Kg
AC86923-018	C-SWLL7*	Aroclor (Total)	ND	mg/Kg
AC86923-019	C-SWLL8*	Aroclor (Total)	ND	mg/Kg
AC86923-020	C-SWLL9*	Aroclor (Total)	ND	mg/Kg
AC86923-021	C-SWMM 4*	Aroclor (Total)	2.9	mg/Kg

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC86923-022	C-SWMM 5*	Aroclor (Total)	1.1	mg/Kg
AC86923-023	C-SWMM 6*	Aroclor (Total)	ND	mg/Kg
AC86923-024	C-SWMM 7*	Aroclor (Total)	ND	mg/Kg
AC86923-025	C-SWMM 8*	Aroclor (Total)	ND	mg/Kg
AC86923-026	C-SWMM 9*	Aroclor (Total)	ND	mg/Kg
AC86923-028	C-B22*	Aroclor (Total)	0.12J	mg/Kg
AC86923-029	FD9815-2 ^{(11)*}	Aroclor (Total)	3.1J	mg/Kg
AC86923-030	C-B23*	Aroclor (Total)	ND	mg/Kg
AC86923-034	C-SWNN4*	Aroclor (Total)	3.3	mg/Kg
AC86923-035	C-SWNN5*	Aroclor (Total)	0.09	mg/Kg
AC86923-036	C-SWNN6*	Aroclor (Total)	0.4	mg/Kg
AC86923-037	C-SWNN7*	Aroclor (Total)	ND	mg/Kg
AC86923-038	C-SWNN8*	Aroclor (Total)	ND	mg/Kg
AC86923-039	C-SWNN9*	Aroclor (Total)	ND	mg/Kg
AC86923-040	C-SW003*	Aroclor (Total)	0.13	mg/Kg
AC86923-041	C-SW004*	Aroclor (Total)	ND	mg/Kg
AC86923-042	C-SW005*	Aroclor (Total)	0.16	mg/Kg
AC86923-043	C-SW006*	Aroclor (Total)	0.038	mg/Kg
AC86923-044	C-SW007*	Aroclor (Total)	ND	mg/Kg
AC86923-045	C-SW008*	Aroclor (Total)	0.051	mg/Kg
AC86923-046	C-SW009*	Aroclor (Total)	0.1	mg/Kg
AC86923-047	C-SWPP3*	Aroclor (Total)	11	mg/Kg
AC86923-050	C-SWPP4*	Aroclor (Total)	0.65J	mg/Kg
AC86923-051	C-SWPP5*	Aroclor (Total)	0.15	mg/Kg
AC86923-052	C-SWPP6*	Aroclor (Total)	0.11	mg/Kg
AC86923-053	C-SWPP7*	Aroclor (Total)	0.66	mg/Kg
AC86923-054	C-SWPP8*	Aroclor (Total)	ND	mg/Kg
AC86923-055	C-SWPP9*	Aroclor (Total)	ND	mg/Kg
AC86923-056	FD9815-3 ⁽¹²⁾ *	Aroclor (Total)	ND UJ	mg/Kg
AC86923-058	C-SWQQ3*	Aroclor (Total)	0.29	mg/Kg
AC86923-059	C-SWQQ4*	Aroclor (Total)	10	mg/Kg
AC86923-060	C-SWQQ5*	Aroclor (Total)	0.16	mg/Kg
AC86923-061	C-SWQQ6*	Aroclor (Total)	1.5	mg/Kg
AC86923-062	C-SWQQ7*	Aroclor (Total)	1	mg/Kg
AC86923-063	C-SWQQ8*	Aroclor (Total)	2.4	mg/Kg
AC86923-064	C-SWQQ9*	Aroclor (Total)	3	mg/Kg
AC86923-065	C-B24*	Aroclor (Total)	1.3	mg/Kg
AC86923-066	C-B25*	Aroclor (Total)	3.6	mg/Kg
AC87110-001	C-B42*	Aroclor (Total)	38	mg/Kg
AC87110-004	C-B43*	Aroclor (Total)	33J	mg/Kg
AC87110-005	C-B44*	Aroclor (Total)	15J	mg/Kg
AC87110-006	C-B45	Aroclor (Total)	400	mg/Kg
AC87110-007	C-B46*	Aroclor (Total)	30	mg/Kg
AC87110-008	C-B47*	Aroclor (Total)	26	mg/Kg
AC87110-009	C-B48	Aroclor (Total)	310	mg/Kg
AC87110-010	C-B49*	Aroclor (Total)	0.46	mg/Kg

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC87110-011	C-B50*	Aroclor (Total)	120	mg/Kg
AC87110-012	FD91615-1 ^{(13)*}	Aroclor (Total)	71J	mg/Kg
AC87110-013	C-SWMMM0*	Aroclor (Total)	8	mg/Kg
AC87110-014	C-SWMMM1*	Aroclor (Total)	12	mg/Kg
AC87110-015	C-SWMMM2*	Aroclor (Total)	0.23	mg/Kg
AC87110-016	C-SWMMM3*	Aroclor (Total)	1.5	mg/Kg
AC87110-017	C-SWNNN0*	Aroclor (Total)	4.7	mg/Kg
AC87110-018	C-SWNNN1*	Aroclor (Total)	16	mg/Kg
AC87110-019	C-SWNNN2*	Aroclor (Total)	9	mg/Kg
AC87110-020	C-SWNNN3*	Aroclor (Total)	0.5	mg/Kg
AC87110-021	C-SWOOO0*	Aroclor (Total)	15	mg/Kg
AC87110-022	C-SWOOO1*	Aroclor (Total)	4.3	mg/Kg
AC87110-023	C-SWOO02*	Aroclor (Total)	23	mg/Kg
AC87110-024	C-SWOOO3*	Aroclor (Total)	9.5	mg/Kg
AC87110-025	C-SWPPP0*	Aroclor (Total)	0.61	mg/Kg
AC87110-026	C-SWPPP1*	Aroclor (Total)	1.5	mg/Kg
AC87110-027	C-SWPPP2*	Aroclor (Total)	0.067	mg/Kg
AC87110-028	C-SWQQQ0*	Aroclor (Total)	11	mg/Kg
AC87110-029	C-SWRRR0	Aroclor (Total)	57	mg/Kg
AC87110-030	C-SWRRR1	Aroclor (Total)	60	mg/Kg
AC87110-031	C-SWSSS0	Aroclor (Total)	130	mg/Kg
AC87110-032	C-SWSSS1	Aroclor (Total)	66	mg/Kg
AC87110-035	C-SWSSS 2	Aroclor (Total)	140	mg/Kg
AC87110-036	FD91615-2 ⁽¹⁴⁾	Aroclor (Total)	89	mg/Kg
AC87110-038	C-SWTTT0	Aroclor (Total)	36	mg/Kg
AC87110-039	C-SWTTT1	Aroclor (Total)	67	mg/Kg
AC87110-042	C-SWTTT2	Aroclor (Total)	7.8	mg/Kg
AC87110-043	FD91715-1 ⁽¹⁵⁾	Aroclor (Total)	130	mg/Kg
AC87110-045	C-SWTTT3	Aroclor (Total)	28	mg/Kg
AC87110-046	C-SWTTT4	Aroclor (Total)	13	mg/Kg
AC87110-047	C-SWTTT5	Aroclor (Total)	77	mg/Kg
AC87110-048	C-SWTTT6	Aroclor (Total)	37	mg/Kg
AC87110-049 AC87110-050	C-SWTTT7 C-SWTTT8	Aroclor (Total) Aroclor (Total)	130 52	mg/Kg
AC87110-050 AC87110-051	C-SWTTT9			mg/Kg
AC87110-051 AC87110-052	C-SWTTT10	Aroclor (Total) Aroclor (Total)	270 58	mg/Kg mg/Kg
AC87110-052 AC87110-053	C-SWTTT11	Aroclor (Total)	45	mg/Kg
AC87110-053	C-SWUUU0*	Aroclor (Total)	1.9	mg/Kg
AC87110-055	C-SWUUU1*	Aroclor (Total)	1.4	mg/Kg
AC87110-056	C-SWUUU2*	Aroclor (Total)	1.9	mg/Kg
AC87110-057	C-SWUUU3*	Aroclor (Total)	0.56	mg/Kg
AC87110-058	C-SWUUU4*	Aroclor (Total)	350	mg/Kg
AC87110-059	C-SWUUU5*	Aroclor (Total)	12000	mg/Kg
AC87110-060	C-SWUUU6*	Aroclor (Total)	11000	mg/Kg
AC87110-061	C-SWUUU7*	Aroclor (Total)	6800	mg/Kg
AC87110-062	C-SWUUU8*	Aroclor (Total)	4900	mg/Kg

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC87110-063	C-SWUUU9*	Aroclor (Total)	9400	mg/Kg
AC87110-064	C-SWUUU10*	Aroclor (Total)	1400	mg/Kg
AC87110-065	C-SWUUU11*	Aroclor (Total)	620	mg/Kg
AC87110-066	C-SWWWW10	Aroclor (Total)	12	mg/Kg
AC87110-067	C-SWWWW11	Aroclor (Total)	18	mg/Kg
AC87110-068	C-SWXXX10	Aroclor (Total)	0.79	mg/Kg
AC87110-069	C-SWXXX11	Aroclor (Total)	540	mg/Kg
AC87110-070	C-SWYYY10	Aroclor (Total)	27	mg/Kg
AC87110-071	C-SWYYY11	Aroclor (Total)	1100	mg/Kg
AC87110-072	C-SWZZZ10*	Aroclor (Total)	0.87	mg/Kg
AC87110-073	C-SWZZZ11*	Aroclor (Total)	0.094	mg/Kg
AC87110-074	C-SW1A10*	Aroclor (Total)	0.22	mg/Kg
AC87110-075	C-SW1A11*	Aroclor (Total)	0.05	mg/Kg
AC87110-076	C-SW1B10*	Aroclor (Total)	1.4	mg/Kg
AC87110-077	C-SW1B11*	Aroclor (Total)	0.96	mg/Kg
AC87110-078	C-SW1C10	Aroclor (Total)	17	mg/Kg
AC87110-079	C-SW1C11	Aroclor (Total)	44	mg/Kg
AC87110-080	C-SW1D10	Aroclor (Total)	74	mg/Kg
AC87110-081	C-SW1D11	Aroclor (Total)	0.46	mg/Kg
AC87110-082	` '		6.9J	mg/Kg
AC87110-085	FD91715-2 ^{(16)*}	Aroclor (Total)	1.6	mg/Kg
AC87110-087	C-SW1E11* Aroclor (Total)		1.8	mg/Kg
AC87110-088	C-SW1F10	Aroclor (Total)	4.7	mg/Kg
AC87110-089	C-SW1F11	Aroclor (Total)	1.6	mg/Kg
AC87110-090	C-SW1G10	Aroclor (Total)	1.9	mg/Kg
AC87110-091	87110-091		60	mg/Kg
AC87110-092			1100	mg/Kg
AC87110-093			61	mg/Kg
AC88532-001	C-SW1J253.5*	Aroclor (Total)	0.19	mg/Kg
AC87111-002	C-SWHHH0*	Aroclor (Total)	0.054	mg/Kg
AC87111-005	C-SWHHH1*	Aroclor (Total)	0.093	mg/Kg
AC87111-006	FD91515-1 ⁽¹⁷⁾ *	Aroclor (Total)	ND	mg/Kg
AC87111-007	C-SWHHH2*	Aroclor (Total)	ND	mg/Kg
AC87111-008	C-SWHHH3*	Aroclor (Total)	ND	mg/Kg
AC87111-009	C-SWIII0*	Aroclor (Total)	1.5	mg/Kg
AC87111-010	C-SWIII1*	Aroclor (Total)	ND	mg/Kg
AC87111-011	C-SWIII2*	Aroclor (Total)	0.2	mg/Kg
AC87111-012	C-SWIII3*	Aroclor (Total)	ND	mg/Kg
AC87111-013	C-SWJJJ0*	Aroclor (Total)	0.17	mg/Kg
AC87111-014	C-SWJJJ1*	Aroclor (Total)	ND	mg/Kg
AC87111-015	C-SWJJJ2*	Aroclor (Total)	0.9	mg/Kg
AC87111-016	C-SWJJJ3*	Aroclor (Total)	1.2	mg/Kg
AC87111-017	C-SWKKK0*	Aroclor (Total)	0.38	mg/Kg
AC87111-018	C-SWKKK1*	Aroclor (Total)	0.2	mg/Kg
AC87111-019	C-SWKKK2*	Aroclor (Total)	ND	mg/Kg
AC87111-020	C-SWKKK3*	Aroclor (Total)	0.04	mg/Kg

Lab Sample ID	ample ID Client Sample ID Analyte		Result	Units
AC87111-021	C-SWLLL0*	Aroclor (Total)	9.3	mg/Kg
AC87111-022	C-SWLLL1*	Aroclor (Total)	ND	mg/Kg
AC87111-023	C-SWLLL2*	Aroclor (Total)	ND	mg/Kg
AC87111-024	C-SWLLL3*	Aroclor (Total)	ND	mg/Kg
AC87111-025	C-B38*	Aroclor (Total)	0.074	mg/Kg
AC87111-026	C-B39*	Aroclor (Total)	0.074	mg/Kg
AC87111-020 AC87111-027	C-B40*	Aroclor (Total)	4	mg/Kg
AC87111-028	C-B41*	Aroclor (Total)	0.7	mg/Kg
AC87388-001	C-B45-1	Aroclor (Total)	77	mg/Kg
AC87388-002	C-B45-2	Aroclor (Total)	7.3	mg/Kg
AC87388-003	C-B48-1	Aroclor (Total)	7.00	mg/Kg
AC87388-004	C-B48-2	Aroclor (Total)	520	mg/Kg
AC87388-005	C-B50-1	Aroclor (Total)	2.8	mg/Kg
AC87388-006	C-B50-1	Aroclor (Total)	0.56	mg/Kg
AC87388-007	C-SWID-1-10*	Aroclor (Total)	0.5	mg/Kg
AC87388-008	C-SWID-1-10*	Aroclor (Total)	18	mg/Kg
AC87521-001	C-SW0002-1*	Aroclor (Total)	ND	mg/Kg
AC87884-002	C-B46-8*	Aroclor (Total)	10	mg/Kg
AC87884-005	C-B46-9*	Aroclor (Total)	0.82	mg/Kg
	(19)			
AC87884-006 AC87884-007	C-B46-10*	Aroclor (Total)	0.8 2.5	mg/Kg
	C-B46-10 C-B46-11*	Aroclor (Total)		mg/Kg
AC87884-008	C-B46-11*	Aroclor (Total)	1.3	mg/Kg
AC87884-009	C-B46-12 C-B46-13*	Aroclor (Total)	0.53	mg/Kg
AC87884-010 AC87884-011	C-B46-13 C-B46-14*	Aroclor (Total) Aroclor (Total)	0.94 0.73	mg/Kg
AC87884-012	C-B46-15*	Aroclor (Total)	0.73	mg/Kg
AC87884-013	C-B49-8	Aroclor (Total)	1.1	mg/Kg mg/Kg
AC87884-014	C-B49-9	Aroclor (Total)	2	mg/Kg
AC87884-015	C-B49-10	Aroclor (Total)	5.6	mg/Kg
AC87884-016	C-B49-10	Aroclor (Total)	2.2	mg/Kg
AC87884-017	C-B49-11 C-B49-12	Aroclor (Total)	6.5	mg/Kg
AC87884-018	C-B49-12	Aroclor (Total)	1.4	mg/Kg
AC87884-019	C-B49-13 C-B49-14	Aroclor (Total)	6.6	mg/Kg
AC87884-020	C-B49-14	Aroclor (Total)	0.24	mg/Kg
AC87884-022	C-B49-13 C-B45-12	Aroclor (Total)	2.4	mg/Kg
AC87884-025	C-B45-12	Aroclor (Total)	0.82	mg/Kg
AC87884-026	FD102915-32 ⁽¹⁹⁾	ì		
	C-B45-14	Aroclor (Total) Aroclor (Total)	0.79 0.32	mg/Kg
AC87884-027 AC87884-028	C-B45-14 C-B45-15	Aroclor (Total)	0.32	mg/Kg
AC87884-029	C-B45-15 C-B48-12	Aroclor (Total)	12	mg/Kg
AC87884-030	C-B46-12 C-B48-13	, ,	1.6	mg/Kg
	C-B46-13 C-B48-14	Aroclor (Total) Aroclor (Total)	1.0	mg/Kg
AC87884-031 AC87884-032	C-B48-14 C-B48-15	, ,		mg/Kg
		Aroclor (Total)	0.38	mg/Kg
AC87886-002	C-B51-0	Aroclor (Total)	170	mg/Kg
AC87886-005	C-B51-1	Aroclor (Total)	82	mg/Kg
AC87886-006	886-006		950	mg/Kg

Lab Sample ID	ID Client Sample ID Analyte		Result	Units
AC87886-007			8.1	mg/Kg
AC87886-008	FD102815-27 (20)	Aroclor (Total)	85	mg/Kg
AC87886-009	C-B52-0	Aroclor (Total)	1600	mg/Kg
AC87886-010	C-B52-1	Aroclor (Total)	3000	mg/Kg
AC87886-011	C-B52-2	Aroclor (Total)	14.2	mg/Kg
AC87886-012	C-B52-3	Aroclor (Total)	3000	mg/Kg
AC87886-013	C-B53-0	Aroclor (Total)	27	mg/Kg
AC87886-014	C-B53-1	Aroclor (Total)	9.1	mg/Kg
AC87886-015	C-B53-2	Aroclor (Total)	4.8	mg/Kg
AC87886-016	C-B53-3	Aroclor (Total)	0.21	mg/Kg
AC87886-017	C-B54-0*	Aroclor (Total)	82	mg/Kg
AC87886-018	C-B54-1*	Aroclor (Total)	3200	mg/Kg
AC87886-019	C-B54-2*	Aroclor (Total)	4.72	mg/Kg
AC87886-020	C-B54-3*	Aroclor (Total)	48	mg/Kg
AC87886-021	C-B55-0*	Aroclor (Total)	2.09	mg/Kg
AC87886-022	C-B55-1*	Aroclor (Total)	10400	mg/Kg
AC87886-023	C-B55-2*	Aroclor (Total)	3.23	mg/Kg
AC87886-024	C-B55-3*	Aroclor (Total)	1.5	mg/Kg
AC87886-026	C-B56-0	Aroclor (Total)	79.7	mg/Kg
AC87886-029	C-B56-1	Aroclor (Total)	1400	mg/Kg
AC87886-030	FD102815-28 ⁽²¹⁾	Aroclor (Total)	2600	mg/Kg
AC87886-031	C-B56-2			mg/Kg
AC87886-032	C-B56-3	Aroclor (Total)	21.2	mg/Kg
AC87886-033	C-B57-0	Aroclor (Total)	110	mg/Kg
AC87886-034	C-B57-1	Aroclor (Total)	2900	mg/Kg
AC87886-035	C-B57-2	Aroclor (Total)	38	mg/Kg
AC87886-036	C-B57-3	Aroclor (Total)	10	mg/Kg
AC87886-038	C-B50-8*	Aroclor (Total)	7.3	mg/Kg
AC87886-041	C-B50-9*	Aroclor (Total)	0.42	mg/Kg
AC87886-042	FD102815-29 (22)*	Aroclor (Total)	0.47	mg/Kg
AC87886-043	C-B50-10*	Aroclor (Total)	0.29	mg/Kg
AC87886-044	C-B50-11*	Aroclor (Total)	0.73	mg/Kg
AC87886-045	C-B50-12*	Aroclor (Total)	1.8	mg/Kg
AC87886-046	C-B50-13*	Aroclor (Total)	0.99	mg/Kg
AC87886-047	C-B50-14*	Aroclor (Total)	0.58	mg/Kg
AC87886-048	C-B50-15*	Aroclor (Total)	1.1	mg/Kg
AC87886-049	C-B47-6*	Aroclor (Total)	0.11	mg/Kg
AC87886-050	C-B47-7*	Aroclor (Total)	ND	mg/Kg
AC87886-051	C-B47-8*	Aroclor (Total)	0.077	mg/Kg
AC87886-052	C-B47-9*	Aroclor (Total)	0.3	mg/Kg
AC87886-053	C-B47-10*	Aroclor (Total)	0.3	mg/Kg
AC87886-054	C-B47-11*	Aroclor (Total)	0.67	mg/Kg
AC87886-055	C-B47-12*	Aroclor (Total)	0.67	mg/Kg
AC87886-056	C-B47-13*	Aroclor (Total)	0.32	mg/Kg
AC87886-057	C-B47-14*	Aroclor (Total)	0.47	mg/Kg
AC87886-058	C-B47-15*	Aroclor (Total)	0.11	mg/Kg

Lab Sample ID	Sample ID Client Sample ID Analyte		Result	Units
AC87886-060			29	mg/Kg
AC87886-063	C-B44-7*	Aroclor (Total)	0.14	mg/Kg
AC87886-064	FD102815-30 (23)*	Aroclor (Total)	0.16	mg/Kg
AC87886-065	C-B44-8*	Aroclor (Total)	0.32	mg/Kg
AC87886-066	C-B44-9*	Aroclor (Total)	0.33	mg/Kg
AC87886-067	C-B44-10*	Aroclor (Total)	0.21	mg/Kg
AC87886-068	C-B44-11*	Aroclor (Total)	0.72	mg/Kg
AC87886-069	C-B44-12*	Aroclor (Total)	19	mg/Kg
AC87886-070	C-B44-13*	Aroclor (Total)	0.056	mg/Kg
AC87886-071	C-B44-14*	Aroclor (Total)	0.049	mg/Kg
AC87886-072	C-B44-15*	Aroclor (Total)	ND	mg/Kg
AC87886-073	C-B43A-7*	Aroclor (Total)	38	mg/Kg
AC87886-074	C-B43A-8*	Aroclor (Total)	0.078	mg/Kg
AC87886-075	C-B43A-9*	Aroclor (Total)	ND	mg/Kg
AC87886-076	C-B43A-10*	Aroclor (Total)	1.1	mg/Kg
AC87886-077	C-B43A-11*	Aroclor (Total)	4.9	mg/Kg
AC87886-078	C-B43A-12*	Aroclor (Total)	0.044	mg/Kg
AC87886-079	C-B43A-13*	Aroclor (Total)	0.063	mg/Kg
AC87886-080	C-B43A-14*	Aroclor (Total)	ND	mg/Kg
AC87886-081	C-B43A-15*	Aroclor (Total)	ND	mg/Kg
AC87886-082	C-B43-8*	Aroclor (Total)	0.16	mg/Kg
AC87886-083	C-B43-9*	Aroclor (Total)	0.39	mg/Kg
AC87886-084	C-B43-10*	Aroclor (Total)	0.26	mg/Kg
AC87886-085	C-B43-11*	Aroclor (Total)	0.13	mg/Kg
AC87886-086	C-B43-12*	Aroclor (Total)	0.053	mg/Kg
AC87886-087	C-B43-13*	Aroclor (Total)	0.08	mg/Kg
AC87886-088	C-B43-14*	Aroclor (Total)	0.046	mg/Kg
AC87886-089	C-B43-15*	Aroclor (Total)	0.065	mg/Kg
AC87905-025	C-B42-10*	Aroclor (Total)	5.6	mg/Kg
AC87905-026	C-B42-11*	Aroclor (Total)	0.12	mg/Kg
AC87905-027	C-B42-12*	Aroclor (Total)	0.1	mg/Kg
AC87905-028	C-B42-13*	Aroclor (Total)	0.052	mg/Kg
AC87905-029	C-B42-14*	Aroclor (Total)	0.056	mg/Kg
AC87905-030	C-B42-15*	Aroclor (Total)	0.12	mg/Kg
AC88278-060	C-B52-244A*	Aroclor (Total)	1600	mg/Kg
AC88278-061	C-B52-243*	Aroclor (Total)	1900	mg/Kg
AC88278-062	C-B52-242*	Aroclor (Total)	10	mg/Kg
AC87356-005	GPA-1*	Aroclor (Total)	ND	mg/Kg
AC87356-008	GPA-3*	Aroclor (Total)	ND	mg/Kg
AC87356-010	GPA-5*	Aroclor (Total)	ND	mg/Kg
AC87356-012	GPA-7*	Aroclor (Total)	0.044	mg/Kg
AC87356-014	GPA-9*	Aroclor (Total)	ND 0.05	mg/Kg
AC87356-016	GPA-11*	Aroclor (Total)	0.25	mg/Kg
AC87356-017	GPA-12*	Aroclor (Total)	0.057	mg/Kg
AC87356-018	GPA-13*	Aroclor (Total)	ND 0.44	mg/Kg
AC87356-019	GPB-0*	Aroclor (Total)	0.14	mg/Kg

Lab Sample ID	mple ID		Result	Units
AC87356-020	GPB-1*	Aroclor (Total)	ND	mg/Kg
AC87356-022	GPB-3*	Aroclor (Total)	ND	mg/Kg
AC87356-024	GPB-5*	Aroclor (Total)	0.27	mg/Kg
AC87356-025	GPB-6*	Aroclor (Total)	0.27	
AC87356-025 AC87356-026	GPB-7*	\ /	11	mg/Kg
		Aroclor (Total)	0.54	mg/Kg
AC87356-027	GPB-8*	Aroclor (Total)	2	mg/Kg
AC87356-028	GPB-9*	Aroclor (Total)		mg/Kg
AC87356-030	GPB-11*	Aroclor (Total)	0.2	mg/Kg
AC87356-031	GPB-12*	Aroclor (Total)	0.42	mg/Kg
AC87356-032	GPB-13*	Aroclor (Total)	0.35	mg/Kg
AC87356-034	GPC-0*	Aroclor (Total)	5.6	mg/Kg
AC87356-037	GPC-1*	Aroclor (Total)	0.83	mg/Kg
AC87356-039	GPC-2*	Aroclor (Total)	0.3	mg/Kg
AC87356-040	GPC-3*	Aroclor (Total)	0.77	mg/Kg
AC87356-042	GPC-5*	Aroclor (Total)	1.5	mg/Kg
AC87356-043	GPC-6*	Aroclor (Total)	13	mg/Kg
AC87356-044	GPC-7*	Aroclor (Total)	5.6	mg/Kg
AC87356-045	GPC-8*	Aroclor (Total)	2.1	mg/Kg
AC87356-046	GPC-9*	Aroclor (Total)	0.29	mg/Kg
AC87356-047	GPC-10*	Aroclor (Total)	0.16	mg/Kg
AC87356-048	GPC-11*	Aroclor (Total)	0.15	mg/Kg
AC87356-050	GPD-0*	Aroclor (Total)	0.033	mg/Kg
AC87356-053	GPD-1*	Aroclor (Total)	0.29J	mg/Kg
AC87356-055	GPD-2*	Aroclor (Total)	0.099	mg/Kg
AC87356-056	GPD-3*	Aroclor (Total)	0.33	mg/Kg
AC87356-057	GPD-4*	Aroclor (Total)	0.69	mg/Kg
AC87356-058	GPD-5*	Aroclor (Total)	1100	mg/Kg
AC87356-059	GPD-6*	Aroclor (Total)	20	mg/Kg
AC87356-060	GPD-7*	Aroclor (Total)	7.8	mg/Kg
AC87356-061	GPD-8*	Aroclor (Total)	1.1	mg/Kg
AC87356-062	GPD-9*	Aroclor (Total)	0.16	mg/Kg
AC87356-063	GPD-10*	Aroclor (Total)	0.22	mg/Kg
AC87356-064	GPD-11*	Aroclor (Total)	0.19	mg/Kg
AC87356-065	GPE-0*	Aroclor (Total)	27	mg/Kg
AC87356-066	GPE-1*	Aroclor (Total)	0.16	mg/Kg
AC87356-067	GPE-2*	Aroclor (Total)	0.18	mg/Kg
AC87356-068	GPE-3*	Aroclor (Total)	0.44	mg/Kg
AC87356-069	GPE-4*	Aroclor (Total)	0.54	mg/Kg
AC87356-070	GPE-5*	Aroclor (Total)	1.1	mg/Kg
AC87356-071	GPE-6*	Aroclor (Total)	9.1	mg/Kg
AC87356-072	GPE-7*	Aroclor (Total)	22	mg/Kg
AC87356-073	GPE-8*	Aroclor (Total)	0.16	mg/Kg
AC87356-074	GPE-9*	Aroclor (Total)	0.041	mg/Kg
AC87356-075	GPE-10*	Aroclor (Total)	0.25	mg/Kg
AC87356-076	GPE-11*	Aroclor (Total)	0.19	mg/Kg
AC87356-078	GPF-1*	Aroclor (Total)	16	mg/Kg

Lab Sample ID	Client Sample ID Analyte		Result	Units
AC87356-079	GPF-2*	Aroclor (Total)	1.2	mg/Kg
AC87356-080	GPF-3*	Aroclor (Total)	0.64	mg/Kg
AC87356-081	GPF-4*	Aroclor (Total)	71	mg/Kg
AC87356-082	GPF-5*	Aroclor (Total)	1	mg/Kg
AC87356-083	GPF-6*	Aroclor (Total)	210	mg/Kg
AC87356-084	GPF-7*	Aroclor (Total)	1300	mg/Kg
AC87356-085	GPF-8*	Aroclor (Total)	7.7	mg/Kg
AC87356-086	GPF-9*	Aroclor (Total)	0.14	mg/Kg
AC87356-087	GPF-10*	Aroclor (Total)	0.13	mg/Kg
AC87356-088	GPF-11*	Aroclor (Total)	0.13	mg/Kg
AC87356-093	GPG-1*	Aroclor (Total)	0.085	mg/Kg
AC87356-095	GPG-2*	Aroclor (Total)	0.34	mg/Kg
AC87356-096	GPG-3*	Aroclor (Total)	1.7	mg/Kg
AC87356-097	GPG-4*	Aroclor (Total)	3.8	mg/Kg
AC87356-098	GPG-5*	Aroclor (Total)	0.83	mg/Kg
AC87356-099	GPG-6*	Aroclor (Total)	96	mg/Kg
AC87356-100	GPG-7*	Aroclor (Total)	1100	mg/Kg
AC87356-102	GPG-9*	Aroclor (Total)	720	mg/Kg
AC87356-103	GPG-10*	Aroclor (Total)	2	mg/Kg
AC87356-104	GPG-11*	Aroclor (Total)	0.82	mg/Kg
AC87356-106	GPH-0*	Aroclor (Total)	41	mg/Kg
AC87356-109	GPH-1*	Aroclor (Total)	0.068J	mg/Kg
AC87356-111	GPH-2*	Aroclor (Total)	0.085	mg/Kg
AC87356-112	GPH-3*	Aroclor (Total)	0.31	mg/Kg
AC87356-113	GPH-4*	Aroclor (Total)	0.73	mg/Kg
AC87356-114	GPH-5*	Aroclor (Total)	1.98	mg/Kg
AC87356-115	GPH-6*	Aroclor (Total)	3.93	mg/Kg
AC87356-116	GPH-7*	Aroclor (Total)	4160	mg/Kg
AC87356-118	GPH-9*	Aroclor (Total)	430	mg/Kg
AC87356-119	GPH-10*	Aroclor (Total)	65	mg/Kg
AC87356-120	GPH-11*	Aroclor (Total)	19	mg/Kg
AC87356-122	GPI-1*	Aroclor (Total)	0.11	mg/Kg
AC87356-124	GPI-3*	Aroclor (Total)	0.98	mg/Kg
AC87356-126	GPI-5*	Aroclor (Total)	1.6	mg/Kg
AC87356-127	GPI-6*	Aroclor (Total)	1.3	mg/Kg
AC87356-128	GPI-7*	Aroclor (Total)	3800	mg/Kg
AC87356-129	GPI-8*	Aroclor (Total)	83	mg/Kg
AC87356-130	GPI-9*	Aroclor (Total)	13	mg/Kg
AC87356-131	GPI-10*	Aroclor (Total)	10	mg/Kg
AC87356-132	GPI-11*	Aroclor (Total)	1800	mg/Kg
AC88278-057	GPI-244A*	Aroclor (Total)	36	mg/Kg
AC88278-058	GPI-243*	Aroclor (Total)	98	mg/Kg
AC88278-059	GPI-242*	Aroclor (Total)	3.8	mg/Kg
AC87356-137	GPJ-1*	Aroclor (Total)	0.087	mg/Kg
AC87356-140	GPJ-3*	Aroclor (Total)	0.064	mg/Kg
AC87356-142	GPJ-5*	Aroclor (Total)	ND	mg/Kg

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC87356-144	GPJ-7*	Aroclor (Total)	ND	mg/Kg
AC87356-145	GPJ-8*	Aroclor (Total)	ND	mg/Kg
AC87356-146	GPJ-9*	Aroclor (Total)	ND	mg/Kg
AC87356-148	GPJ-11*	Aroclor (Total)	ND	mg/Kg
AC87356-153	GPK-1*	Aroclor (Total)	4.6	mg/Kg
AC87356-156	GPK-3*	Aroclor (Total)	2.8	mg/Kg
AC87356-158	GPK-5*	Aroclor (Total)	0.64	mg/Kg
AC87356-159	GPK-6*	Aroclor (Total)	0.15	mg/Kg
AC87356-160	GPK-7*	Aroclor (Total)	750	mg/Kg
AC87356-161	GPK-8*	Aroclor (Total)	1.6	mg/Kg
AC87356-162	GPK-9*	Aroclor (Total)	0.62	mg/Kg
AC87356-164	GPK-11*	Aroclor (Total)	0.2	mg/Kg
AC87356-165	GPK-12*	Aroclor (Total)	1.5	mg/Kg
AC87356-166	GPK-13*	Aroclor (Total)	0.54	mg/Kg
AC87356-167	GPK-14*	Aroclor (Total)	0.41	mg/Kg
AC87356-168	GPK-15*	Aroclor (Total)	0.5	mg/Kg
AC87387-001	GPL-0*	Aroclor (Total)	0.76	mg/Kg
AC87387-002	GPL-1*	Aroclor (Total)	0.26	mg/Kg
AC87387-006	GPL-5*	Aroclor (Total)	1.6	mg/Kg
AC87387-007	GPL-6*	Aroclor (Total)	9.3	mg/Kg
AC87387-008	GPL-7*	Aroclor (Total)	230	mg/Kg
AC87387-009	GPL-8*	Aroclor (Total)	3.7	mg/Kg
AC87387-010	GPL-9*	Aroclor (Total)	0.14	mg/Kg
AC87387-011	GPL-10*	Aroclor (Total)	0.17	mg/Kg
AC87387-012	GPL-11*	Aroclor (Total)	0.11	mg/Kg
AC87387-014	GPM-0*	Aroclor (Total)	0.16	mg/Kg
AC87387-022	GPM-5*	Aroclor (Total)	0.54	mg/Kg
AC87387-023	GPM-6*	Aroclor (Total)	1.6	mg/Kg
AC87387-024	GPM-7*	Aroclor (Total)	26	mg/Kg
AC87387-025	GPM-8*	Aroclor (Total)	7.6	mg/Kg
AC87387-026	GPM-9*	Aroclor (Total)	3.8	mg/Kg
AC87387-027	GPM-10*	Aroclor (Total)	ND	mg/Kg
AC87387-028	GPM-11*	Aroclor (Total)	ND	mg/Kg
AC87387-034	GPN-0*	Aroclor (Total)	32	mg/Kg
AC87387-037	GPN-1*	Aroclor (Total)	6.1J	mg/Kg
AC87387-038	FD10215-9 (24)	Aroclor (Total)	3.6J	mg/Kg
AC87387-039	GPN-2*	Aroclor (Total)	1.4	mg/Kg
AC87387-040	GPN-3*	Aroclor (Total)	0.38	mg/Kg
AC87387-041	GPN-4*	Aroclor (Total)	0.93	mg/Kg
AC87387-042	GPN-5*	Aroclor (Total)	1	mg/Kg
AC87387-043	GPN-6*	Aroclor (Total)	2.2	mg/Kg
AC87387-044	GPN-7*	Aroclor (Total)	11	mg/Kg
AC87387-045	GPN-8*	Aroclor (Total)	240	mg/Kg
AC87387-046	GPN-9*	Aroclor (Total)	0.31	mg/Kg
AC87387-047	GPN-10*	Aroclor (Total)	0.063	mg/Kg
AC87387-048	GPN-11*	Aroclor (Total)	0.064	mg/Kg

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC87387-049	GPO-0*	Aroclor (Total)	22	mg/Kg
AC87387-050	GPO-1*	Aroclor (Total)	0.23	mg/Kg
AC87387-051	GPO-2*	Aroclor (Total)	0.36	mg/Kg
AC87387-053	GPO-4*	Aroclor (Total)	3.5	mg/Kg
AC87387-054	GPO-5*	Aroclor (Total)	0.52	mg/Kg
AC87387-055	GPO-6*	Aroclor (Total)	140	mg/Kg
AC87387-056	GPO-7*	Aroclor (Total)	10	mg/Kg
AC87387-057	GPO-8*	Aroclor (Total)	0.72	mg/Kg
AC87387-058	GPO-9*	Aroclor (Total)	0.22	mg/Kg
AC87387-071	GPP-2*	Aroclor (Total)	0.83	mg/Kg
AC87387-073	GPP-4*	Aroclor (Total)	7.7	mg/Kg
AC87387-074	GPP-5*	Aroclor (Total)	6.1	mg/Kg
AC87387-075	GPP-6*	Aroclor (Total)	9.5	mg/Kg
AC87387-076	GPP-7*	Aroclor (Total)	790	mg/Kg
AC87387-077	GPP-8*	Aroclor (Total)	0.14	mg/Kg
AC87387-087	GPQ-2*	Aroclor (Total)	0.12	mg/Kg
AC87387-089	GPQ-4*	Aroclor (Total)	22	mg/Kg
AC87387-090	GPQ-5*	Aroclor (Total)	ND	mg/Kg
AC87387-091	GPQ-6*	Aroclor (Total)	13.37	mg/Kg
AC87387-092	GPQ-7*	Aroclor (Total)	4.4J	mg/Kg
AC87387-093	GPQ-8*	Aroclor (Total)	18	mg/Kg
AC87387-094	GPQ-9*	Aroclor (Total)	0.98	mg/Kg
AC87387-095	GPQ-10*	Aroclor (Total)	0.12	mg/Kg
AC87905-001	GPR-7*	Aroclor (Total)	0.69	mg/Kg
AC87905-002	GPS-5*	Aroclor (Total)	0.16	mg/Kg
AC87905-005	GPS-6*	Aroclor (Total)	0.17	mg/Kg
AC87905-006	FD102915-A (25)*	Aroclor (Total)	0.22	mg/Kg
AC87905-007	GPS-7*	Aroclor (Total)	ND	mg/Kg
AC87905-008	GPS-8*	Aroclor (Total)	0.043	mg/Kg
AC87905-009	GPT-5*	Aroclor (Total)	2.2	mg/Kg
AC87905-010	GPT-6*	Aroclor (Total)	5.3	mg/Kg
AC87905-011	GPT-7*	Aroclor (Total)	1.7	mg/Kg
AC87905-012	GPT-8*	Aroclor (Total)	0.89	mg/Kg
AC87905-013	GPT-9*	Aroclor (Total)	ND	mg/Kg
AC87905-014	GPU-5*	Aroclor (Total)	1.4	mg/Kg
AC87905-015	GPU-6*	Aroclor (Total)	0.36	mg/Kg
AC87905-016	GPU-7*	Aroclor (Total)	0.13	mg/Kg
AC87905-017	GPU-8*	Aroclor (Total)	0.65	mg/Kg
AC87905-018	GPV-7*	Aroclor (Total)	7.4	mg/Kg
AC87905-019	GPV-8*	Aroclor (Total)	5.6	mg/Kg
AC87905-020	GPV-9*	Aroclor (Total)	ND	mg/Kg
AC87905-021	GPV-10*	Aroclor (Total)	ND	mg/Kg
AC87905-022	GPW-6*	Aroclor (Total)	ND	mg/Kg
AC87905-023	GPW-7*	Aroclor (Total)	ND	mg/Kg
AC87905-024	GPW-8*	Aroclor (Total)	ND 0.053	mg/Kg
AC88278-022	GPX-246*	Aroclor (Total)	0.053	mg/Kg

Lab Sample ID	Client Sample ID	Analyte	Result	Units
AC88278-019	GPY-248*	Aroclor (Total)	ND	mg/Kg
AC88278-016	GPZ-248*	Aroclor (Total)	ND	mg/Kg
AC87356-006	FD10115-1(29)*	Aroclor (Total)	ND	mg/Kg
AC87356-038	FD10115-2(30)*	Aroclor (Total)	1.3	mg/Kg
AC87356-054	FD10115-3(31)*	Aroclor (Total)	0.08J	mg/Kg
AC87356-094	FD10115-4(32)*	Aroclor (Total)	0.092	mg/Kg
AC87356-110	FD10115-5(33)*	Aroclor (Total)	0.15J	mg/Kg
AC87356-138	FD10215-6(34)*	Aroclor (Total)	0.1	mg/Kg
AC87356-154	FD10215-7(35)*	Aroclor (Total)	3.1	mg/Kg
AC88278-050	GPAA-245*	Aroclor (Total)	0.14	mg/Kg
AC88278-049	GPAA-246*	Aroclor (Total)	ND	mg/Kg
AC88278-048	GPAA-247*	Aroclor (Total)	2.3	mg/Kg
AC88278-055	FD111615-03 (28)*	Aroclor (Total)	ND	mg/Kg
AC88278-046	GPBB-244*	Aroclor (Total)	ND	mg/Kg
AC88278-045	GPBB-245*	Aroclor (Total)	ND	mg/Kg
AC88278-044	GPBB-246*	Aroclor (Total)	ND	mg/Kg
AC88278-043	GPBB-247*	Aroclor (Total)	0.3	mg/Kg
AC88278-046	GPBB-254	Aroclor (Total)	ND	mg/Kg
AC88278-041	GPCC-244*	Aroclor (Total)	ND	mg/Kg
AC88278-040	GPCC-245*	Aroclor (Total)	ND	mg/Kg
AC88278-039	GPCC-246*	Aroclor (Total)	ND	mg/Kg
AC88278-038	GPCC-247*	Aroclor (Total)	0.042	mg/Kg
AC88278-041	GPCC-254	Aroclor (Total)	ND	mg/Kg
AC88278-036	GPDD-244*	Aroclor (Total)	ND	mg/Kg
AC88278-035	GPDD-245*	Aroclor (Total)	ND	mg/Kg
AC88278-034	GPDD-246*	Aroclor (Total)	ND	mg/Kg
AC88278-033	GPDD-247*	Aroclor (Total)	0.29	mg/Kg
AC88278-036	GPDD-254*	Aroclor (Total)	ND	mg/Kg
AC88278-031	GPEE-244*	Aroclor (Total)	ND	mg/Kg
AC88278-029	GPEE-245*	Aroclor (Total)	ND	mg/Kg
AC88278-030	FD111615-2 (27)*	Aroclor (Total)	ND	mg/Kg
AC88278-026	GPEE-246*	Aroclor (Total)	ND	mg/Kg
AC88278-024	GPEE-247*	Aroclor (Total)	0.19	mg/Kg
AC88278-013	GPFF-244*	Aroclor (Total)	ND	mg/Kg
AC88278-012	GPFF-245*	Aroclor (Total)	ND	mg/Kg
AC88278-011	GPFF-246*	Aroclor (Total)	0.14	mg/Kg
AC88278-010	GPFF-247*	Aroclor (Total)	ND	mg/Kg
AC88278-008	GPGG-244*	Aroclor (Total)	ND	mg/Kg
AC88278-007	GPGG-245*	Aroclor (Total)	ND	mg/Kg
AC88278-005	GPGG-246*	Aroclor (Total)	ND	mg/Kg
AC88278-006	FD111615-1 (26)*	Aroclor (Total)	ND	mg/Kg
AC88278-002	GPGG-247*	Aroclor (Total)	0.19	mg/Kg

PCB concentrations in bold have exceeded the criteria of 10 ppm for PCBs in subsurface soil. PCB concentrations in bold and highlighted have exceeded the TSCA criteria of ≥50 ppm.

^{*} Field Sample ID's containing an asterix (*) have been independently validated.

⁽¹⁾ FD081315-3 is a field replicate of C-SWA1

- (2) FD 081315-4 is a field replicate of C-SWF1
- (3) FD082415-1 is a field replicate of C-B4
- (4) FD 082415-2 is a field replicate of C-B7
- (5) FD083115-1 is a field replicate of C-SWX5
- (6) FD083115-2 is a field replicate of C-SWEE5
- (7) FD083115-3 is a field replicate of C-SWII2
- (8) FD9915-1 is a field replicate of C-B27
- (9) FD9915-2 is a field replicate of C-SWTT8
- (10) FD9915-3 is a field replicate of C-SWAAA1
- (11) FD9815-2 is a field replicate of C-B22
- (12) FD9815-3 is a field replicate of C-SWPP4
- (13) FD91615-1 is a field replicate of C-B43
- (14) FD91615-2 is a field replicate of C-SWSSS2
- (15) FD91715-1 is a field replicate of C-SWTTT2
- (16) FD91715-2 is a field replicate of C-SW1E10
- (17) FD91515-1 is a field replicate of C-SWHHH1
- (18) FD102915-31 is a field replicate of C-B46-9
- (19) FD102915-32 is a field replicate of C-B45-13
- (20) FD102815-27 is a field replicate of C-B51-1
- (21) FD102815-28 is a field replicate of C-B56-1
- (22) FD102815-29 is a field replicate of C-B50-9
- (23) FD102815-30 is a field replicate of C-B44-7
- (24) FD10215-9 is a field replicate of GPN-1
- (25) FD102915-A is a field replicate of GPS-6
- (26) FD111615-1 is a field replicate of GPGG-246
- (27) FD111615-2 is a field replicate of GPEE-245
- (28) FD111615-3 is a replicate of GPAA-243 which was not analyzed.
- (29) FD10115-1 is a field replicate of GPA-1
- (30) FD10115-2 is a field replicate of GPC-1
- (31) FD10115-3 is a field replicate of GPD-1
- (32)FD10115-4 is a field replicate of GPG-1
- (33) FD10115-5 is a field replicate of GPH-1
- (34) FD10215-6 is a field replicate of GPJ-1
- (35) FD10215-7 is a field replicate of GPK-1

Soil sample intervals either shaded and bold, or only bold were removed for off site disposal.

TABLE 2.5.1-4: TOTAL PCBS IN SOIL ENDPOINT SAMPLING RESULTS EXCAVATION AREA D 354 BROADWAY BCP SITE TOWN OF FORT EDWARD (Validated Data)*

Lab Sample ID:	Field Sample ID:	(Feet BGS)	Analyte	Result	Units
AC86753-002	D-SWA*	2.5	Aroclor (Total)	ND	mg/Kg
AC86753-005	D-SWB*	0.5	Aroclor (Total)	1.3	mg/Kg
AC86753-006	FD082715-1 ^{(1)*}	0.5	Aroclor (Total)	1.5	mg/Kg
AC86753-007	D-SWC*	1.5	Aroclor (Total)	ND	mg/Kg
AC86753-008	D-SWD*	1.5	Aroclor (Total)	0.08	mg/Kg
AC86753-009	D-SWE*	1.5	Aroclor (Total)	ND	mg/Kg
AC86753-010	D-SWF*	0.5	Aroclor (Total)	0.45	mg/Kg
AC86753-011	D-SWG*	0.5	Aroclor (Total)	0.072	mg/Kg
AC86753-012	D-SWH*	0.5	Aroclor (Total)	3.1	mg/Kg
AC86753-013	D-SWI*	1.5	Aroclor (Total)	ND	mg/Kg
AC86753-014	D-BA*	5	Aroclor (Total)	0.13	mg/Kg
AC86753-015	D-BB*	1	Aroclor (Total)	1.2	mg/Kg
AC86753-016	D-BC*	3	Aroclor (Total)	0.2	mg/Kg
AC86753-017	D-BD*	1	Aroclor (Total)	0.36	mg/Kg
AC86753-018	D-BE*	4	Aroclor (Total)	0.043	mg/Kg
AC86753-019	D-BF*	1	Aroclor (Total)	3.8	mg/Kg
AC86753-020	D-BG*	4	Aroclor (Total)	0.037	mg/Kg
AC86753-021	D-BH*	3	Aroclor (Total)	0.066	mg/Kg
AC86753-022	D-BI*	3	Aroclor (Total)	0.87	mg/Kg
AC86753-023	D-BJ*	1	Aroclor (Total)	ND	mg/Kg
AC86846-002	D-BK*	3	Aroclor (Total)	31 ⁽³⁾	mg/Kg
AC86922-074	D-BK1*	6	Aroclor (Total)	0.84	mg/Kg
AC86846-005	D-BL*	1	Aroclor (Total)	0.071J	mg/Kg
AC86846-006	FD090315-1 ^{(2)*}	1	Aroclor (Total)	0.15J	mg/Kg
AC86846-007	D-BM*	4	Aroclor (Total)	1.2	mg/Kg
AC86846-008	D-BN*	2	Aroclor (Total)	4.8	mg/Kg
AC86846-009	D-BO*	3	Aroclor (Total)	7	mg/Kg
AC86846-010	D-BP*	3	Aroclor (Total)	6.2	mg/Kg
AC86846-011	D-BQ*	5	Aroclor (Total)	0.088	mg/Kg
AC86846-012	D-BR*	5	Aroclor (Total)	ND	mg/Kg
AC86846-013	D-BS*	2	Aroclor (Total)	11 ⁽³⁾	mg/Kg
AC86922-073	D-BS1*	3	Aroclor (Total)	6.6	mg/Kg
AC86846-014	D-BT*	3	Aroclor (Total)	0.17	mg/Kg
AC86846-015	D-SWJ*	0.5	Aroclor (Total)	0.34	mg/Kg
AC86846-016	D-SWK*	0.5	Aroclor (Total)	0.93	mg/Kg
AC86846-017	D-SWL*	2	Aroclor (Total)	3.2	mg/Kg
AC86846-018	D-SWM*	2	Aroclor (Total)	ND	mg/Kg
AC86846-019	D-SWN*	2	Aroclor (Total)	0.063	mg/Kg
AC86846-020	D-SWO*	2.5	Aroclor (Total)	ND	mg/Kg
AC87110-094	D-SWP*	1.5	Aroclor (Total)	41 ⁽³⁾	mg/Kg
AC87110-095	D-SWQ*	1.5	Aroclor (Total)	0.62	mg/Kg
AC87110-096	D-BU	3	Aroclor (Total)	0.54	mg/Kg

PCB concentrations in bold have exceeded the criteria of 10 ppm for PCBs in subsurface soil.

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PCB concentrations in bold and highlighted have exceeded the TSCA criteria of ≥50 ppm.

^{*} Field Sample ID's containing an asterix (*) have been independently validated.

⁽¹⁾ FD082715-1 is a field replicate of D-SWB

⁽²⁾ FD090315-1 is a field replicate of D-BL

⁽³⁾ These locations were excavated further and confirmed by endpoint samples D-BK1 and D-BS1.

TABLE 2.5.1-5: TOTAL PCBS IN SOIL ENDPOINT SAMPLING RESULTS EXCAVATION AREA E (Sampled 8.25.2015) 354 BROADWAY BCP SITE TOWN OF FORT EDWARD (Data Validated)

		Sampling Depth			
Lab Sample ID	Client Sample ID	(Feet BGS)	Analyte	Result	Units
AC86680-002	E-SWA*	2	Aroclor (Total)	0.69	mg/Kg
AC86680-005	E-SWB*	2	Aroclor (Total)	0.75	mg/Kg
AC86680-006	E-SWC*	2	Aroclor (Total)	230 ⁽²⁾	mg/Kg
AC86680-007	E-SWD*	2	Aroclor (Total)	0.09	mg/Kg
AC86680-008	E-BOTTOM*	4	Aroclor (Total)	0.61	mg/Kg
AC86680-009	FD082515-1 ^{(1)*}	2	Aroclor (Total)	0.86	mg/Kg
AC86790-067	E-BOTTOM2*	4	Aroclor (Total)	0.2	mg/Kg
AC86790-068	E-SWE0*	0-0.25	Aroclor (Total)	0.5	mg/Kg
AC86790-069	E-SWE1*	1-1.25	Aroclor (Total)	11 ⁽¹⁾	mg/Kg
AC86790-070	E-SWE2*	2-2.25	Aroclor (Total)	ND	mg/Kg
AC86790-071	E-SWE3*	3-3.25	Aroclor (Total)	0.063	mg/Kg
AC86790-072	E-SWF0*	0-0.25	Aroclor (Total)	1.3	mg/Kg
AC86790-073	E-SWF1*	1-1.25	Aroclor (Total)	0.46	mg/Kg
AC86790-074	E-SWF2*	2-2.25	Aroclor (Total)	1	mg/Kg
AC86790-075	E-SWF3*	3-3.25	Aroclor (Total)	0.86	mg/Kg
AC86790-076	E-SWG0*	0-0.25	Aroclor (Total)	12 ⁽¹⁾	mg/Kg
AC86790-077	E-SWG1*	1-1.25	Aroclor (Total)	0.47	mg/Kg
AC86790-078	E-SWG2*	2-2.25	Aroclor (Total)	0.093	mg/Kg
AC86790-079	E-SWG3*	3-3.25	Aroclor (Total)	0.28	mg/Kg
AC86923-014	E-BOTTOM 3*	2	Aroclor (Total)	1.3	mg/Kg
AC86923-015	E-BOTTOM 4*	2	Aroclor (Total)	0.11	mg/Kg
AC86923-016	E-SWH*	1	Aroclor (Total)	0.34	mg/Kg
AC86923-017	E-SWI*	1	Aroclor (Total)	0.83	mg/Kg

PCB concentrations in bold have exceeded the criteria of 10 ppm for PCBs in subsurface soil.

PCB concentrations in bold and highlighted have exceeded the TSCA criteria of ≥50 ppm.

⁽¹⁾ FD082515-1 is a field replicate of E-SWB

⁽²⁾ This location was excavated further and removed as part of second excavation.

TABLE 2.5.1-6: SVOCs IN SOIL ENDPOINT SAMPLING RESULTS ANALYTICAL SUMMARY EXCAVATION AREA F (Sampled 8.25.2015) 354 BROADWAY BCP SITE TOWN OF FORT EDWARD (Data Validated)

Lab Sample ID	Field Sample ID	Sampling Depth (Feet BGS)	Analyte	SCO ⁽¹⁾	Result	Units
AC86680-010	SVOC-SWA	1.5	bis(2-Ethylhexyl)phthalate	NS ⁽²⁾	0.085B(U)	mg/Kg
AC86680-010	SVOC-SWA	1.5	Di-n-butylphthalate	NS	0.050B(U)	mg/Kg
AC86680-011	SVOC-SWB	1.5	Benzo[b]fluoranthene	5.6	0.042	mg/Kg
AC86680-011	SVOC-SWB	1.5	bis(2-Ethylhexyl)phthalate	NS	0.084B(U)	mg/Kg
AC86680-011	SVOC-SWB	1.5	Di-n-butylphthalate	NS	0.033B(U)	mg/Kg
AC86680-011	SVOC-SWB	1.5	Fluoranthene	500	0.044	mg/Kg
AC86680-011	SVOC-SWB	1.5	Pyrene	500	0.055	mg/Kg
AC86680-012	SVOC-SWC	1.5	Benzo[a]anthracene	5.6	0.052	mg/Kg
AC86680-012	SVOC-SWC	1.5	Benzo[a]pyrene	1	0.065	mg/Kg
AC86680-012	SVOC-SWC	1.5	Benzo[b]fluoranthene	5.6	0.11	mg/Kg
AC86680-012	SVOC-SWC	1.5	Benzo[g,h,i]perylene	500	0.068	mg/Kg
AC86680-012	SVOC-SWC	1.5	Benzo[k]fluoranthene	56	0.041	mg/Kg
AC86680-012	SVOC-SWC	1.5	bis(2-Ethylhexyl)phthalate	NS	0.13B(U)	mg/Kg
AC86680-012	SVOC-SWC	1.5	Chrysene	56	0.083	mg/Kg
AC86680-012	SVOC-SWC	1.5	Di-n-butylphthalate	NS	0.017B(U)	mg/Kg
AC86680-012	SVOC-SWC	1.5	Fluoranthene	500	0.093	mg/Kg
AC86680-012	SVOC-SWC	1.5	Indeno[1,2,3-cd]pyrene	5.6	0.057	mg/Kg
AC86680-012	SVOC-SWC	1.5	Phenanthrene	500	0.050	mg/Kg
AC86680-012	SVOC-SWC	1.5	Pyrene	500	0.11	mg/Kg
AC86680-013	SVOC-SWD	1.5	Benzo[a]anthracene	5.6	0.057	mg/Kg
AC86680-013	SVOC-SWD	1.5	Benzo[a]pyrene	1	0.058	mg/Kg
AC86680-013	SVOC-SWD	1.5	Benzo[b]fluoranthene	5.6	0.089	mg/Kg
AC86680-013	SVOC-SWD	1.5	Benzo[g,h,i]perylene	500	0.060	mg/Kg
AC86680-013	SVOC-SWD	1.5	bis(2-Ethylhexyl)phthalate	NS	0.13B(U)	mg/Kg
AC86680-013	SVOC-SWD	1.5	Chrysene	56	0.072	mg/Kg
AC86680-013	SVOC-SWD	1.5	Di-n-butylphthalate	NS	0.013B(U)	mg/Kg
AC86680-013	SVOC-SWD	1.5	Fluoranthene	500	0.090	mg/Kg
AC86680-013	SVOC-SWD	1.5	Indeno[1,2,3-cd]pyrene	5.6	0.048	mg/Kg
AC86680-013	SVOC-SWD	1.5	Phenanthrene	500	0.051	mg/Kg
AC86680-013	SVOC-SWD	1.5	Pyrene	500	0.11	mg/Kg

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TABLE 2.5.1-6: SVOCs IN SOIL ENDPOINT SAMPLING RESULTS ANALYTICAL SUMMARY EXCAVATION AREA F (Sampled 8.25.2015) 354 BROADWAY BCP SITE TOWN OF FORT EDWARD (Data Validated)

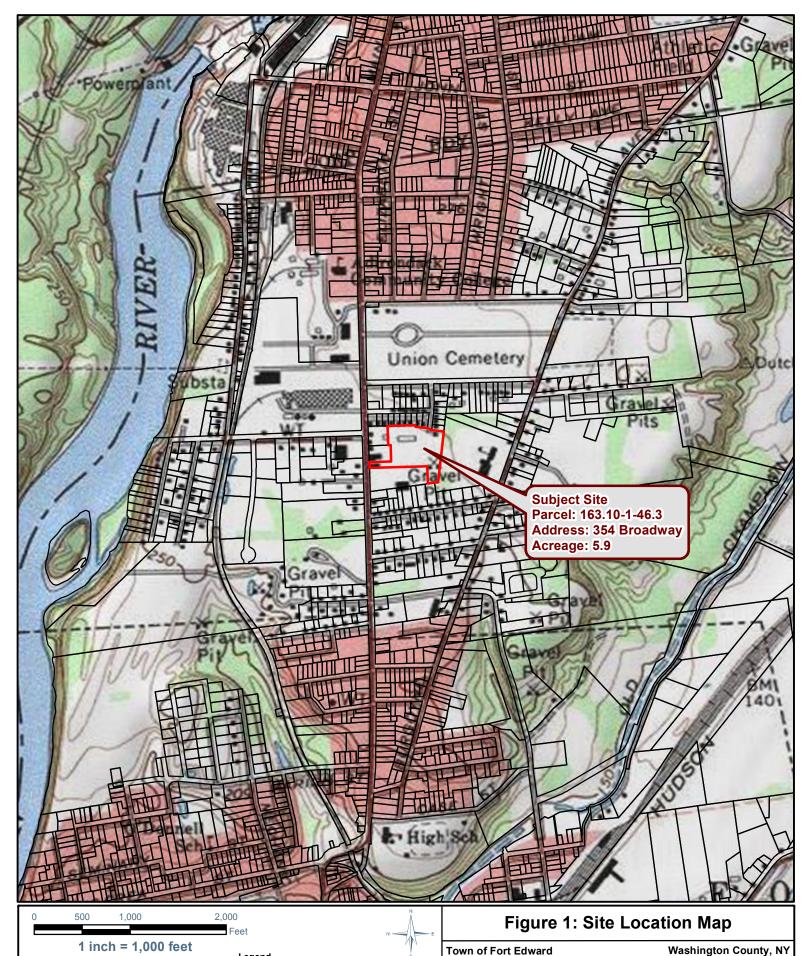
Lab Sample ID	Field Sample ID	Sampling Depth (Feet BGS)	Analyte	SCO ⁽¹⁾	Result	Units
AC86680-014	SVOC-BOTTOM	3	Benzo[a]anthracene	5.6	0.17	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Benzo[a]pyrene	1	0.18	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Benzo[b]fluoranthene	5.6	0.26	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Benzo[g,h,i]perylene	500	0.18	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Benzo[k]fluoranthene	56	0.087	mg/Kg
AC86680-014	SVOC-BOTTOM	3	bis(2-Ethylhexyl)phthalate	NS	0.14B(U)	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Chrysene	56	0.20	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Dibenzo[a,h]anthracene	0.56	0.040	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Di-n-butylphthalate	NS	0.066B(U)	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Fluoranthene	5.6	0.31	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Indeno[1,2,3-cd]pyrene	5.6	0.14	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Phenanthrene	500	0.17	mg/Kg
AC86680-014	SVOC-BOTTOM	3	Pyrene	500	0.35	mg/Kg

⁽¹⁾ Soil Cleanup Objective (SCO) for Restricted Commercial Use Sites promulgated at 6 NYCRR 375.

NS denotes No Standard

Analytical results in bold have exceeded their respective SCO.

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1 inch = 1,000 feet

Project Number: Proposal Data Source: NYSGIS Clearinghouse, BING, USGS Projection: State Plane NAD83 NYE (feet) Date: October 26, 2012 File: 354Broadway8x11_Fig1.mxd GIS: C Secor

Legend



Washington Co. Tax Parcels (2011)

are approximate and do not represent a field survey

Map Note: The locations and features depicted on this map

Washington County, NY

C.T. MALE ASSOCIATES

Engineering, Surveying, Architecture & Landscape Architecture, P.C.

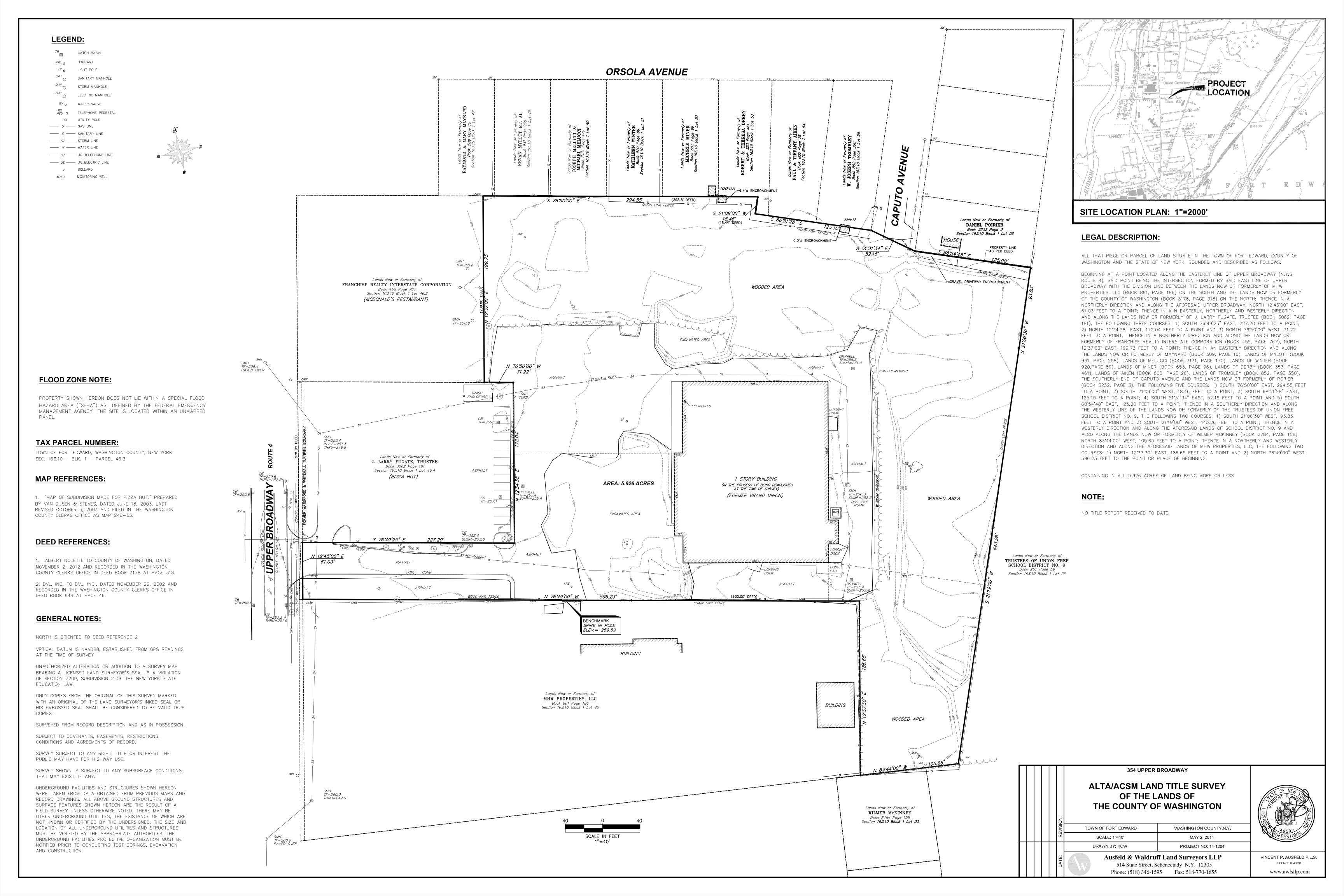
50 CENTURY HILL DRIVE, LATHAM, NEW YORK 12110

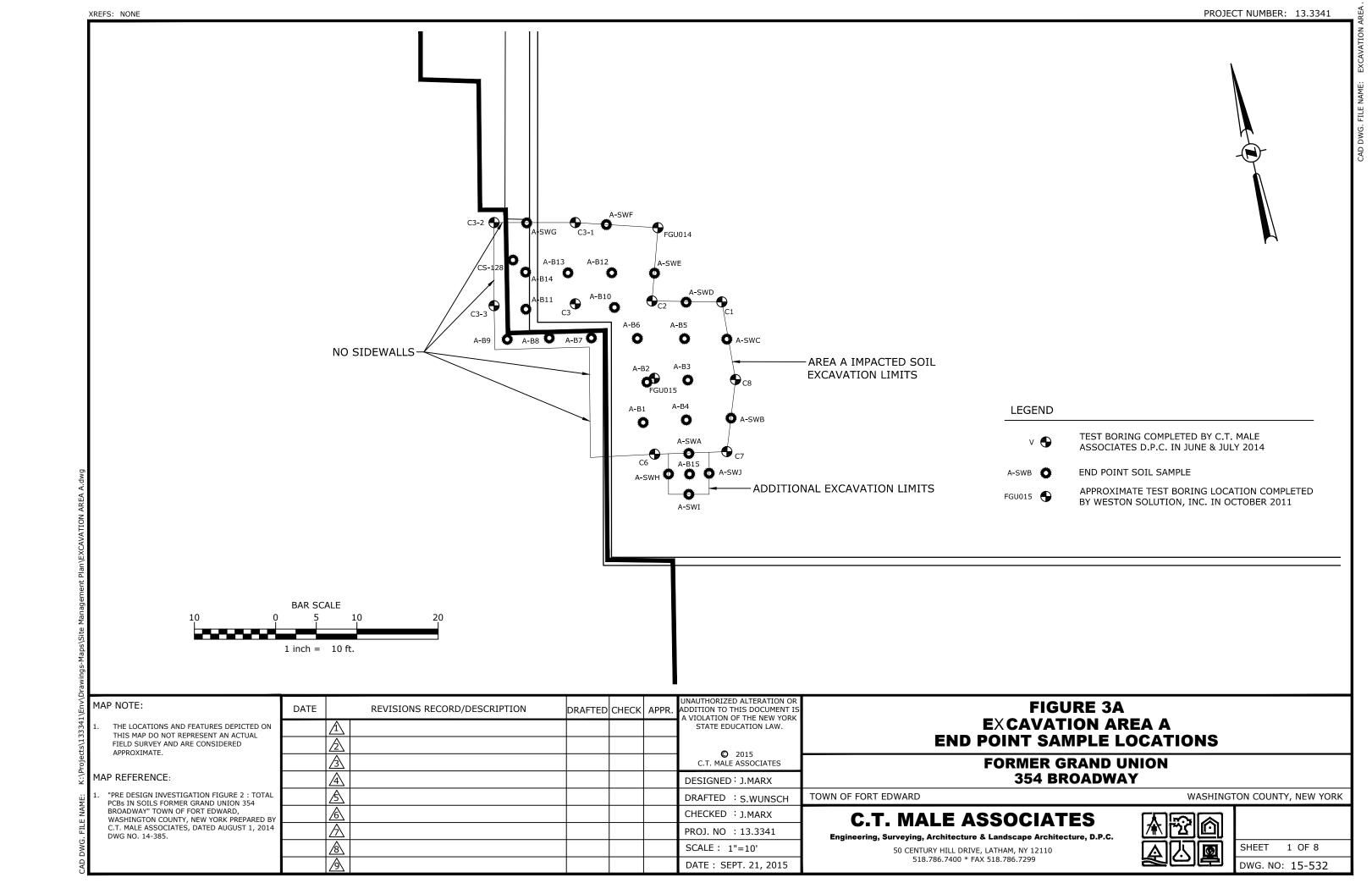
(518) 786-7400 * FAX (518) 786-7299 * WWW.CTMALE.COM

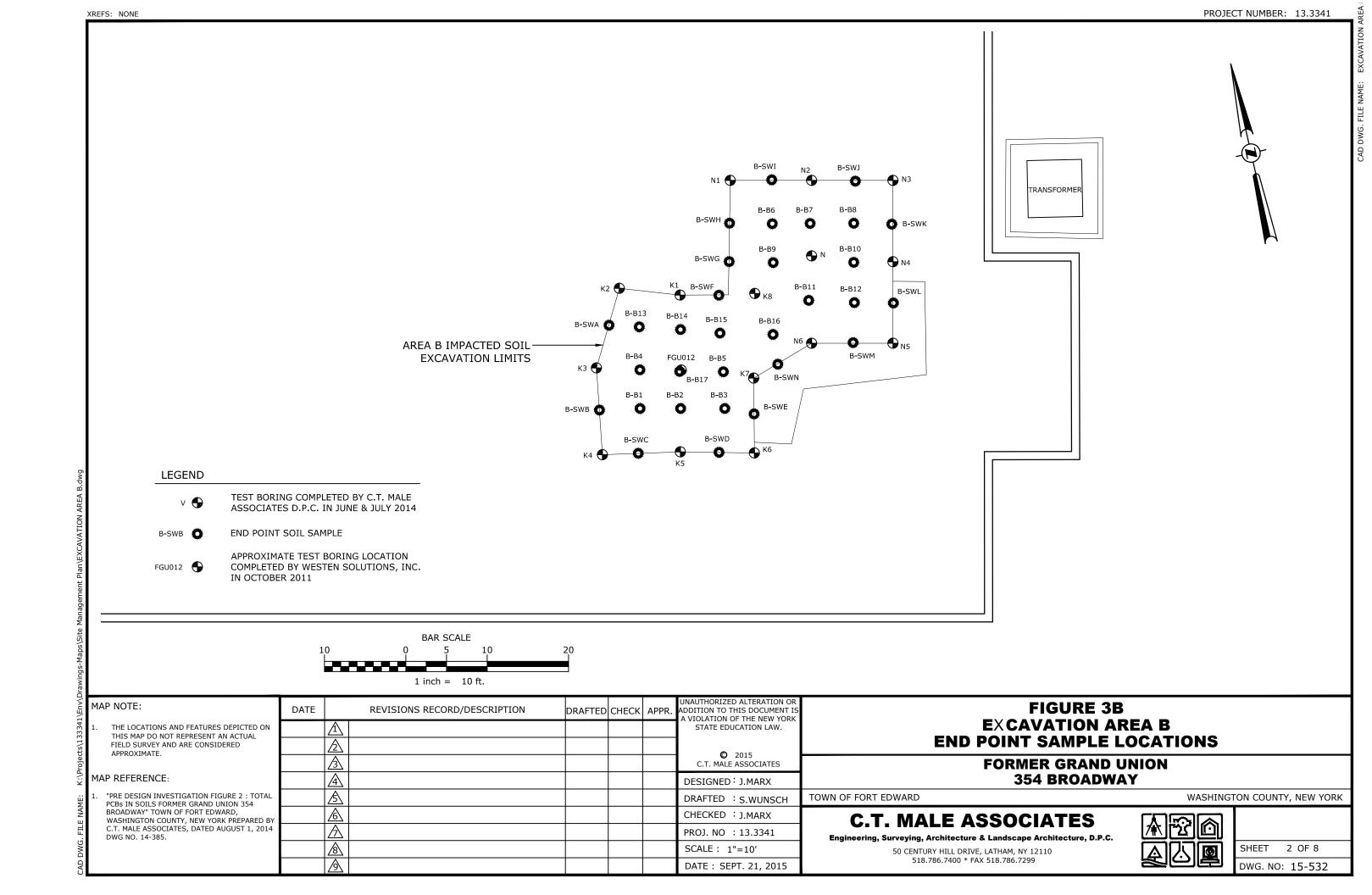
Architecture * Building Systems Engineering * Civil Engineering *

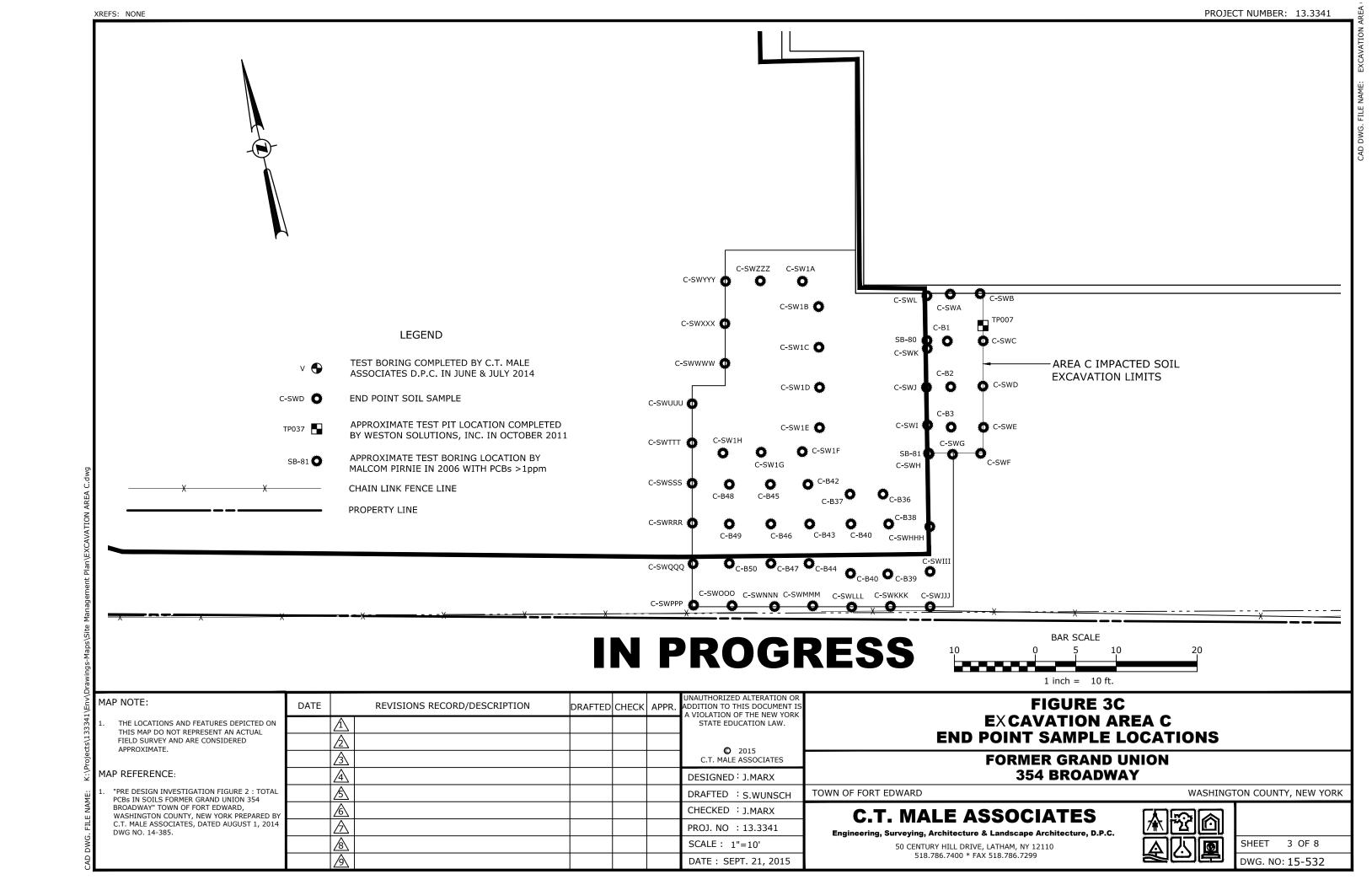
Environmental Services * Geographic Information Services (GIS) *

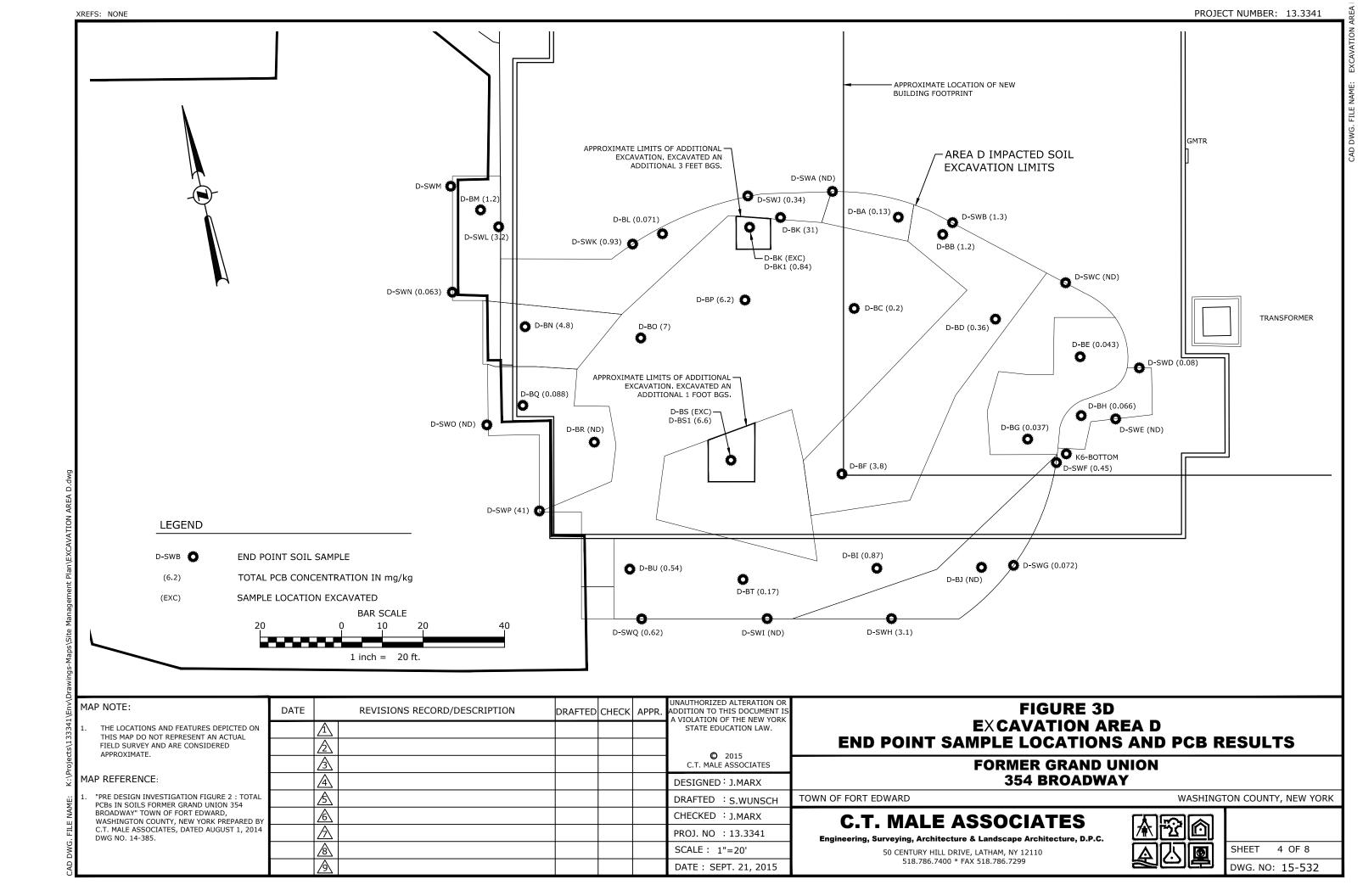
Land Development * Land Surveying

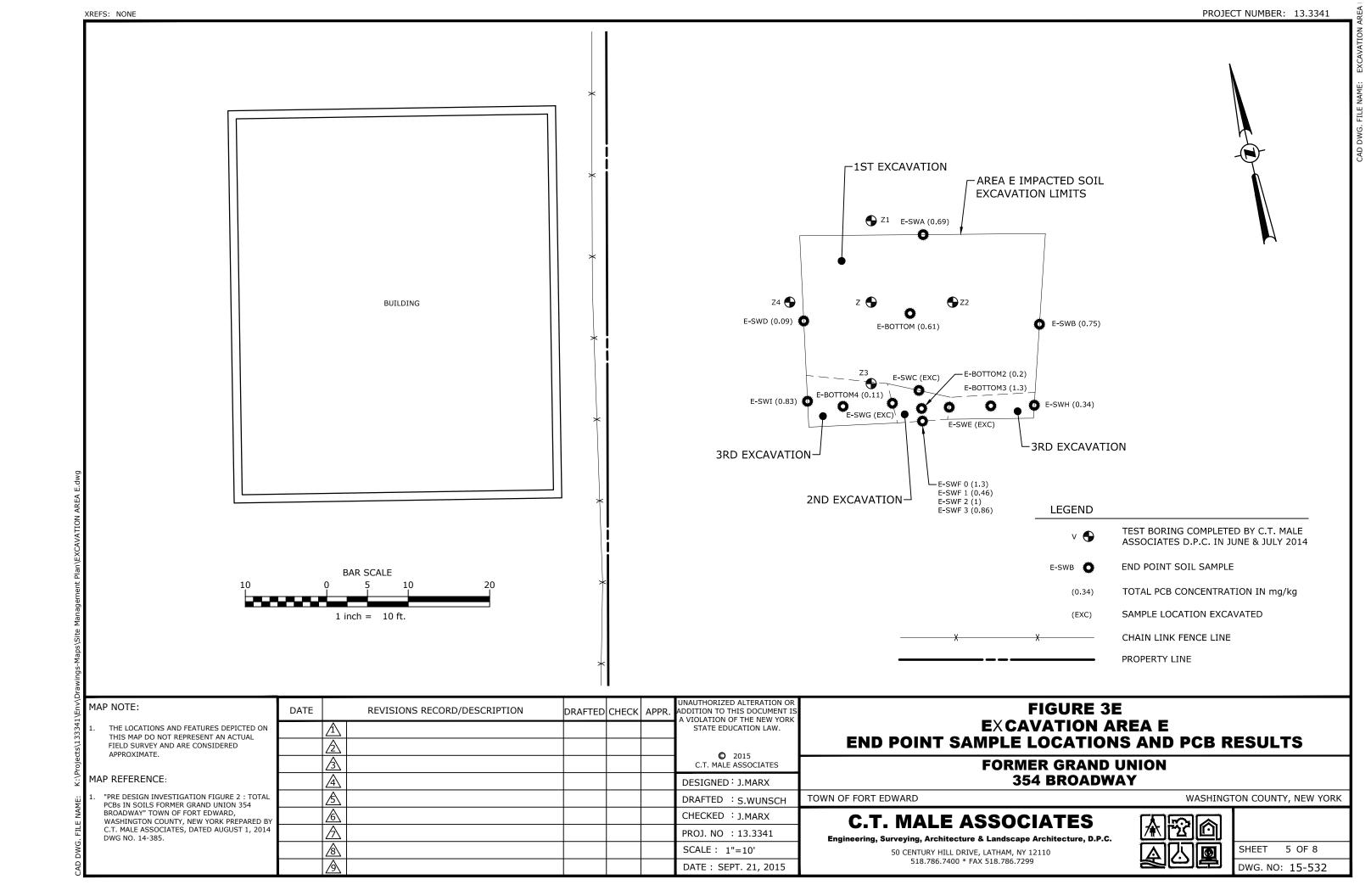


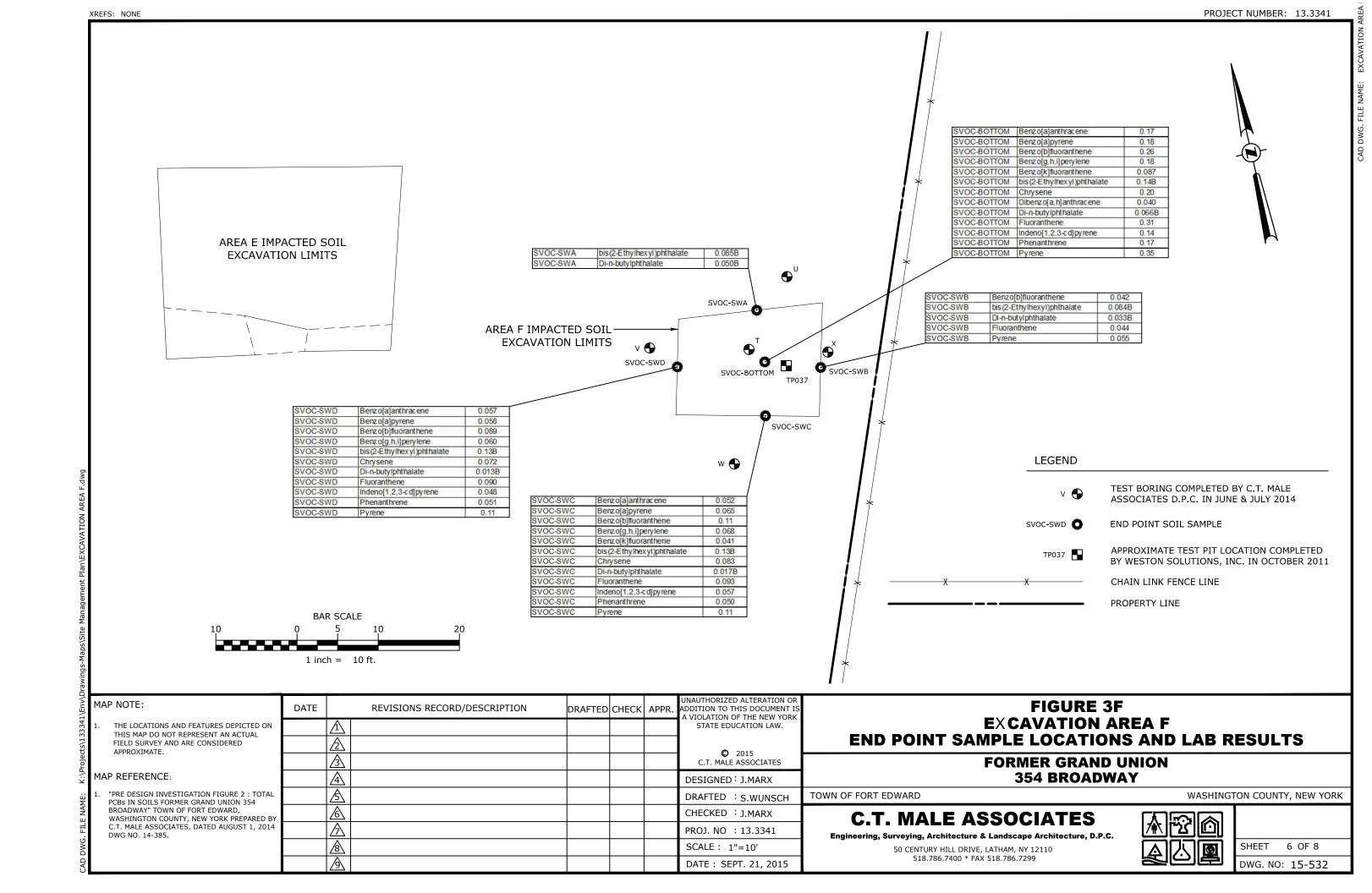


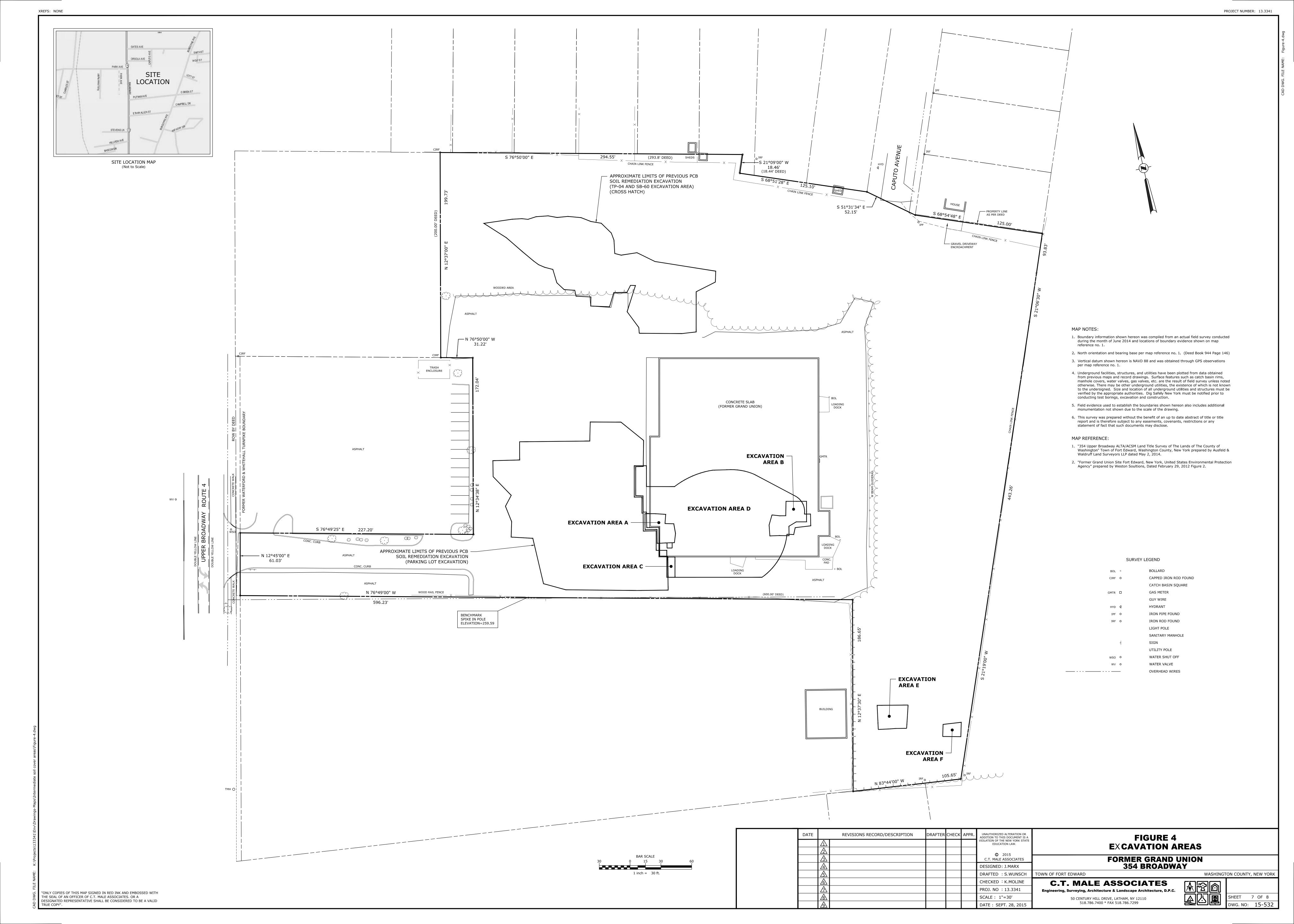


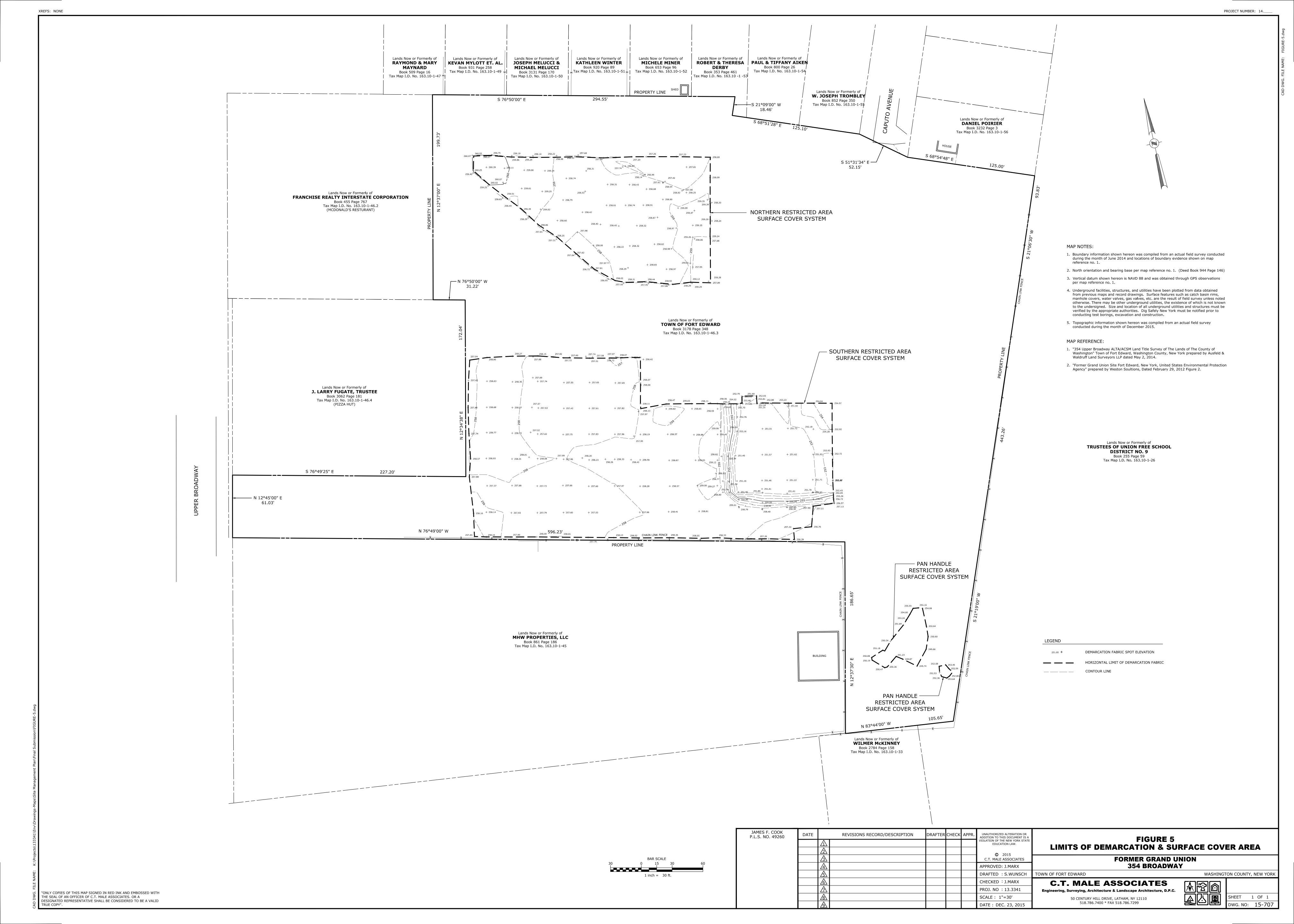












APPENDIX A – LIST OF SITE CONTACTS

Name	Phone/Email Address
Site Owner	
Town of Fort Edward	
Mitchell Suprenant	518.747.5212, supervisor@fortedward.net
Remedial Party	
354 Broadway LLC	
David Kaplan	212.362.9800, david@krg.info
Remedial Party	
Price Chopper Operating Co. Inc.	518.379.1391, nancysantana@pricechopper.com
Nancy Santana	erote (5)(16) 1, <u>illine (5)(illine (5)(illi</u>
Qualified Environmental Professional Kirk Moline	510 706 7500 1- m-1'm-6 -tm-1 m
	518.786.7502, <u>k.moline@ctmale.com</u>
Jeffrey A. Marx, P.E.	518.786.7548, j.marx@ctmale.com
NYSDEC DER Project Manager	
Daniel Eaton	518.402.9563, daniel.eaton@dec.ny.gov
NYSDEC Regional HW Engineer	
Russell Huyck, P.E.	518.987.1200, russell.huyck@dec.ny.gov
	516.567.1200, <u>lussen.muyck@dec.my.gov</u>
NYSDEC Site Control	derweb@dec.ny.gov
Town of Fort Edward Attorney	518.668.2199,
Mary-Ellen Stockwell, ESQ	mestockwell@myerfuller.com

APPENDIX B ENVIRONMENTAL EASEMENT

APPENDIX C EXCAVATION WORK PLAN (EWP)

C-1 NOTIFICATION

At least 15 days prior to the start of any activity that is anticipated to encounter remaining contamination (i.e., areas of designated soil cover per Figure 5 where it is anticipated that the demarcation layer will be disturbed), the site owner or their representative will notify the NYSDEC. Table C-1 includes contact information for the above notification. The information on this table will be updated as necessary to provide accurate contact information. A full listing of site-related contact information is provided in Appendix A.

Table C-1: Notifications*

Central Office NYSDEC Representative: Daniel Eaton	518.402.9563 daniel.eaton@dec.ny.gov
Regional Office NYSDEC Representative: Russell Huyck, P.E.	518.987.1200 russell.huyck@dec.ny.gov
Central Office NYSDEC Site Control	derweb@dec.ny.gov

^{*} Note: Notifications are subject to change and will be updated as necessary.

This notification will include:

 A detailed description of the work to be performed, including the location and areal extent and depth of excavation, plans/drawings for site re-grading, intrusive elements or utilities to be installed below the soil cover, estimated volumes of contaminated soil to be excavated and any work that may impact an engineering control;

- A summary of environmental conditions anticipated to be encountered in the work areas, including the nature and concentration levels of contaminants of concern, potential presence of grossly contaminated media, and plans for any pre-construction sampling;
- A schedule for the work, detailing the start and completion of all intrusive work;
- A summary of the applicable components of this EWP;
- A statement that the work will be performed in compliance with this EWP and 29 CFR 1910.120;
- A copy of the contractor's health and safety plan (HASP), in electronic format;
- Identification of disposal facilities for potential waste streams; and
- Identification of sources of any anticipated backfill, along with all required chemical testing results.

C-2 SOIL SCREENING METHODS

Excavation activities may commence without the presence of a qualified environmental professional within all areas of the site except for areas of remaining contamination (i.e., areas below the demarcation layer per Figure 5) where the depth of excavation is anticipated to reach the demarcation layer. Any contractor working below the ground surface needs to be made aware that there is a potential to encounter PCB contamination in soil above the water table. Visual, olfactory and instrument-based (e.g. photoionization detector) soil screening will be performed by a qualified environmental professional during all excavations into known or potentially contaminated material (remaining contamination). Soil screening will be performed when invasive work is done and will include all excavation and invasive work performed during development, such as excavations for foundations and utility work, after issuance of the COC.

Soils will be segregated based on previous environmental data and screening results into material that requires off-site disposal and material that requires testing to

determine if the material can be reused on-site as soil beneath a cover or if the material can be used as cover soil. Further discussion of off-site disposal of materials and on-site reuse is provided in Section C-6 and C-7, respectively, of this Appendix.

C-3 SOIL STAGING METHODS

Soil stockpiles will be continuously encircled with a berm and/or silt fence unless other erosion controls are in-place to prevent a release of sediment during a storm event. Hay bales or other acceptable erosion and sediment control devices/methods will be used as needed near catch basins, surface waters and other discharge points in accordance with applicable stormwater regulations.

Stockpiles of existing soils when not handled for more than seven days will be kept covered at all times with appropriately anchored tarps. Stockpiles will be routinely inspected and damaged tarp covers will be promptly replaced.

Stockpiles of existing site soils will be inspected at a minimum once each week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by the NYSDEC.

C-4 MATERIALS EXCAVATION AND LOAD-OUT

A qualified environmental professional or person under their supervision will not need to oversee invasive work performed above the Site's demarcation layer. A qualified environmental professional or person under their supervision will oversee all invasive work below the Site's demarcation layer (i.e., areas of designated soil cover per Figure 5) and the excavation and load-out of all excavated material. The owner of the property and remedial party (if applicable) and its contractors are responsible for safe execution of all invasive and other work performed under this Plan.

The presence of utilities and easements on the site will be investigated by the owner of the property and/or its contractor. It will be determined by the qualified environmental professional whether a risk or impediment to the planned work under this SMP is posed by utilities or easements on the site.

Loaded vehicles leaving the site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, and NYSDOT requirements (and all other applicable transportation requirements).

A truck wash or other sediment removing devices/methods will be operated onsite, as appropriate, to satisfy the requirements of the General Permit, when applicable. Locations where vehicles enter or exit the site shall be inspected daily for evidence of off-site soil tracking. The owner or their designated qualified environmental professional will be responsible for ensuring that all outbound trucks do not track site soils off-site. Truck wash waters (and sediments) will be collected and disposed of off-site in an appropriate manner.

The qualified environmental professional will be responsible for ensuring that all egress points for truck and equipment transport from the site are clean of dirt and other materials derived from the site during intrusive excavation activities involving remaining contamination. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials.

C-5 MATERIALS TRANSPORT OFF-SITE

Transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded.

Material transported by trucks exiting the site will be secured with tight-fitting covers (not mesh). Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

Truck transport routes are to be considered prior to major site renovation or further development. Appropriate truck route takes into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport.

Trucks will be prohibited from stopping and idling in the neighborhood outside the project site. Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during site remediation and/or development.

Queuing of trucks will be performed on-site in order to minimize off-site disturbance. Off-site queuing will be prohibited.

C-6 MATERIALS DISPOSAL OFF-SITE

Soil/fill excavated and removed from the site (excluding imported, clean fill including, but not limited to, all clean fill in the Construction Envelope) will be treated as
contaminated and regulated material and will be transported and disposed in accordance
with all local, State (including 6 NYCRR Part 360) and Federal regulations. If disposal
of other material from this site is proposed for unregulated off-site disposal, a formal
request with an associated plan will be made to the NYSDEC. Unregulated off-site
management of materials from this site (other than imported, clean surface cover soils
above the demarcation layer) will not occur without formal NYSDEC approval.

Off-site disposal locations for excavated soils will be identified in the preexcavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate, i.e. hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C/D recycling facility, etc. Actual disposal quantities and associated documentation will be reported to the NYSDEC in the Periodic Review Report. This documentation will include: waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

Non-hazardous historic fill and contaminated soils taken off-site will be handled, at minimum, as a Municipal Solid Waste per 6 NYCRR Part 360-1.2. Material that does not meet Unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6 NYCRR Part 360-16 Registration Facility).

C-7 MATERIALS REUSE ON-SITE

Chemical criteria for on-Site reuse of material have been approved by NYSDEC and are listed in NYSDEC DER-10 and 6 NYCRR Part 375. The qualified environmental professional will require that procedures defined for materials reuse in this SMP are followed and that unacceptable material does not remain on-site. Contaminated on-site material, including historic fill and contaminated soil, that is acceptable for reuse on-site will be placed below the demarcation layer or impervious surface, and will not be reused within a cover soil layer, within landscaping berms, or as backfill for subsurface utility lines. Criteria for soil reuse are as follows: 1) existing Site soils below the demarcation layer must be tested by an environmental professional to determine if they may be re-used on-site; 2) soils above the demarcation layer are clean imported soils and may be re-used without restriction; and 3) grossly contaminated soils must be treated as a regulated material.

Any demolition material proposed for reuse on-site will be sampled for asbestos and the results will be reported to the NYSDEC for acceptance. Concrete crushing or processing on-site will not be performed without prior NYSDEC approval. Organic matter (wood, roots, stumps, etc.) or other solid waste derived from clearing and grubbing of the site will not be reused on-site.

C-8 FLUIDS MANAGEMENT

Unless testing has confirmed that contamination is below applicable standards, liquids to be removed from the site, including but not limited to, excavation dewatering, decontamination waters and groundwater monitoring well purge and development waters, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations. Dewatering, purge and development fluids will not be recharged back to the land surface or subsurface of the site, and will be managed off-site, unless prior approval is obtained from NYSDEC.

Discharge of water generated during large-scale construction activities to surface waters (i.e. a local pond, stream or river) will be performed under a SPDES permit or as otherwise approved in advance by the NYSDEC.

C-9 COVER SYSTEM RESTORATION

After the completion of soil removal and any other invasive activities the cover system will be restored in a manner that complies with the decision document. The existing cover system is comprised of a demarcation fabric and a minimum of 12" of clean soil. The demarcation layer, consisting of geotextile fabric will be replaced to provide a visual reference to the top of the remaining contamination zone, the zone that requires adherence to special conditions for disturbance of remaining contaminated soils defined in this SMP. If the type of cover system changes from that which exists prior to the excavation (i.e., a soil cover is replaced by asphalt), this will constitute a modification

of the cover element of the remedy and the upper surface of the remaining contamination. A figure showing the modified surface will be included in the subsequent Periodic Review Report and in an updated SMP. In the absence of an amendment to the SMP, clean fill, pavement, sidewalks and buildings constructed over the cover system will not be considered to be part of the engineering control and may be altered or eliminated without triggering the EWP.

C-10 BACKFILL FROM OFF-SITE SOURCES

Materials proposed for import onto the site will be approved by the qualified environmental professional and will be in compliance with provisions in this SMP prior to receipt at the site. A Request to Import/Reuse Fill or Soil form, which can be found at http://www.dec.ny.gov/regulations/67386.html, will be prepared and submitted to the NYSDEC project manager allowing a minimum of 5 business days for review.

The source of the imported backfill will need to be documented. Material from industrial sites, spill sites, or other environmental remediation sites or potentially contaminated sites will not be imported to the site without prior NYSDEC approval.

Imported soils will meet the backfill and cover soil quality standards established in 6NYCRR 375-6.7(d). Based on an evaluation of the land use and protection of groundwater, the resulting soil quality standards are listed in Appendix 5 of NYSDEC DER-10. Soils that meet 'exempt' fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this site, will not be imported onto the site without prior approval by NYSDEC. Solid waste will not be imported onto the site.

Imported backfill shall be documented clean by analytical testing. Imported backfill will be analyzed according to the following schedule:

Recommended Number of Soil Samples for Soil Imported to the Site			
Contaminant	Volatile Organic Semi-volatile Organic Compounds, Compounds Inorganics & PCBs/Pesticides		
Imported Backfill Quantity in Cubic Yards	Discrete Samples	Composite Samples	Discrete Samples/Composites
0-50	1	1	3-5 Discrete samples
51 – 100	2	1	from different
101 – 200	3	1	locations in the fill
201 – 300	4	1	being provided will
301 – 400	4	2	compromise a
401 – 500	5	2	composite sample
501 – 800	6	2	for analysis
801 – 1,000	7	2	
> 1,000 Add an additional two volatile organic compound discrete samples and one composite sample for each additional 1,000 cubic yards or consult with NYSDEC			

C-11 STORMWATER POLLUTION PREVENTION

Prior to implementing any Site disturbance greater than one acre, a Stormwater Pollution Prevention Plan (SWPPP) will be prepared in accordance with the regulations for erosion and sediment controls and water quantity/quality controls. This will provide guidance to the contractor doing the construction activities. With the preparation of the SWPPP comes a requirement for submitting a Notice of Intent (NOI) to the NYSDEC upon completion of the SWPPP to document the project exists and gain permit coverage. The NOI will be completed with direction and input from the Site owner and/or remedial party. There is also a requirement to submit a Municipal Separate Sewer System (MS4)

SWPPP Acceptance Form to the Town of Fort Edward. This form is used by a regulated, traditional land use control MS4 to indicate acceptance of a SWPPP it has reviewed. In addition to the SWPPP, Erosion and Sediment Control (ESC) plans will be designed and prepared as applicable for implementing the construction activity in accordance with the current stormwater regulations.

When the larger than one acre of disturbance construction project is complete and has met the requirements of the construction permit, a Notice of Termination (NOT) form shall be completed and submitted to the Department.

For implementing construction activities with disturbance with less than one acre, erosion and sediment controls (i.e., silt fencing, hay bales, etc.) will be installed around the down gradient perimeter of the work areas and around temporary stockpiles of excavated soil and imported backfill. Erosion and sediment controls will be observed once a week and corrective actions shall begin within one business day of contractor notification of deficiencies. Deficiencies include removal of accumulated sediments against silt fence, undercutting or erosion of the silt fence, and uncontrolled discharge off-site of turbid water. Corrective action shall be completed within a reasonable time frame. Results of inspections will be recorded in a logbook and maintained at the Site at the construction trailer or at the Owner's office and available for review by NYSDEC.

C-12 EXCAVATION CONTINGENCY PLAN

If underground tanks or other previously unidentified contaminant sources are found during post-remedial subsurface excavations or development related construction, excavation activities will be suspended until NYSDEC is notified and properly trained personnel and sufficient equipment are mobilized to address the condition.

Sampling will be performed on product, sediment and surrounding soils, etc. as necessary to determine the nature of the material and proper disposal method. Chemical analysis will be performed for a full list of analytes (TAL metals; TCL volatiles and

semi-volatiles, TCL pesticides and PCBs), unless the site history and previous sampling results provide a sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC for approval prior to sampling.

Identification of unknown or unexpected contaminated media identified by screening during invasive site work will be promptly communicated by phone to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in the Periodic Review Report.

APPENDIX D SITE MANAGEMENT FORMS

Engineering, Surveying, Architecture & Landscape Architecture, D.P.C.



50 Century Hill Drive, Latham, NY 12110 518.786.7400 FAX 518.786.7299 www.ctmale.com

FORMER GRAND UNION SITE (C558033) SITE MANAGEMENT PLAN (SMP) INSPECTION FORM

Date of Inspection	
Personnel Performing Inspection	
Weather Conditions	
Institutional Controls (List)	Site Management Plan Implementation
	Groundwater Use Restriction Without Treatment
	Use Restriction (Restricted Commercial)
Engineering Controls (List)	Surface Cover Systems

This SMP Inspection Form shall be utilized to document the observations of the Former Grand Union Site located at 354 Broadway in the Town of Fort Edward, Washington County, New York. These observations are to confirm the following:

- The institutional control and/or engineering control employed at this Site is unchanged from the date the control was put in place, or last approved by the Department;
- Nothing has occurred that would impair the ability of the control to protect the public health and environment;
- Nothing has occurred that would constitute a violation or failure to comply with any SMP for this control;

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- Access to the Site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control;
- Use of the Site is compliant with the environmental easement;
- The engineering control systems are performing as designed and are effective;

General Surface Condition		
Has the overall condition of the cover system changed from the previous inspection?	Yes 🗌	No 🗌
If Yes, provide detail below and identify on Site Plan		
Is there evidence that the site been disturbed for utility repair or construction?	Yes 🗌	No 🗌
If Yes, provide detail below and identify on Site Plan		

Page - 3

Gros	ındwı	ater	Hee
OIOI	muw	nici	use

Is there evidence of groundwater use? If Yes, provide detail below	Yes 🗌	No 🗌
If groundwater use is occurring, is there treatment? If Yes, provide type of treatment below	Yes 🗌	No 🗌
If groundwater treatment is occurring, did NYSDEC and NYSDOH approve such treatment? If Yes, provide detail on their approval below	Yes 🗌	No 🗌
71		

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Site Use		
Is there evidence of site use for activities not allowed by the restricted commercial use BCP definition? If Yes, provide detail below	Yes 🗌	No 🗌
	•	

Summary of Green Remediation Metrics for S	Site Management	
Site Name:	Site Code:	
Address: Zip Code:	County:	
Initial Report Period (Start Date of period cov Start Date:	vered by the Initial R	eport submittal)
Current Reporting Period		
Reporting Period From:	To:	
Contact Information		
Preparer's Name:	Phone No.:	
- · · · · · · · · ·		
I. Energy Usage: Quantify the amount of portion of that derived from renewable energy so		ly on-site and the
	Current Reporting Period	Total to Date
Fuel Type 1 (e.g. natural gas (cf))		
Fuel Type 2 (e.g. fuel oil, propane (gals))		
Electricity (kWh)		
Of that Electric usage, provide quantity:		
Derived from renewable sources (e.g. solar, wind)		
Other energy sources (e.g. geothermal, solar		
thermal (Btu))		
Provide a description of all energy usage reduction provided on Page 3.II. Solid Waste Generation: Quantify the risite.		-
	Current	Total to Date
	Reporting Period	(tons)
	(tons)	(tolls)
Total waste generated on-site	,	
OM&M generated waste		
Of that total amount, provide quantity:		
Transported off-site to landfills		
Transported off-site to other disposal facilities		
Transported off-site for recycling/reuse		
Reused on-site		

Provide a description of any implemented waste reduction programs for the site in the space provided on Page 3.

III. Transportation/Shipping: Quantify the distances travelled for delivery of supplies, shipping of laboratory samples, and the removal of waste.

	Current Reporting Period (miles)	Total to Date (miles)
Standby Engineer/Contractor		
Laboratory Courier/Delivery Service		
Waste Removal/Hauling		

Provide a description of all mileage reduction programs for the site in the space provided on Page 3. Include specifically any local vendor/services utilized that are within 50 miles of the site.

IV. Water Usage: Quantify the volume of water used on-site from various sources.

	Current Reporting Period	Total to Date (gallons)
Total quantity of water used on-site	(gallons)	
Of that total amount, provide quantity:		
Public potable water supply usage		
Surface water usage		
On-site groundwater usage		
Collected or diverted storm water usage		

Provide a description of any implemented water consumption reduction programs for the site in the space provided on Page 3.

V. Land Use and Ecosystems: Quantify the amount of land and/or ecosystems disturbed and the area of land and/or ecosystems restored to a pre-development condition (i.e. Green Infrastructure).

	Current Reporting Period (acres)	Total to Date (acres)
Land disturbed		
Land restored		

Provide a description of any implemented land restoration/green infrastructure programs for the site in the space provided on Page 3.

Description of green remediation programs reported above
(Attach additional sheets if needed)
Energy Usage:
Waste Generation:
Waste Generation.
Transportation/Shipping:
Water usage:
Land Use and Ecosystems:
Other:
Offici.
CERTIFICATION BY CONTRACTOR
I, (Name) do hereby certify that I am
(Title) of the Company/Corporation herein referenced and
contractor for the work described in the foregoing application for payment. According to
my knowledge and belief, all items and amounts shown on the face of this application for
payment are correct, all work has been performed and/or materials supplied, the
foregoing is a true and correct statement of the contract account up to and including that
last day of the period covered by this application.
Date Contractor

APPENDIX E RESPONSIBILITIES of OWNER and REMEDIAL PARTY

Responsibilities

The responsibilities for implementing the Site Management Plan ("SMP") for the Former Grand Union site (the "site"), number C558033, are divided between the site owner(s) and a Remedial Party, as defined below. The owner(s) is/are currently listed as:

Town of Fort Edward (the "owner")
 Attention Mitchell Suprenant, Supervisor
 118 Broadway, Fort Edward, NY 12828

Solely for the purposes of this document and based upon the facts related to a particular site and the remedial program being carried out, the term Remedial Party ("RP") refers to any of the following: certificate of completion holder, volunteer, applicant, responsible party, and, in the event the New York State Department of Environmental Conservation ("NYSDEC") is carrying out remediation or site management, the NYSDEC and/or an agent acting on its behalf. The RPs are:

- 354 Broadway LLC, David Kaplan, 170 West 74th Street, NY, NY 10023.
- Price Chopper Operating Co. Inc., Nancy Santana, 461 Nott Street, Schenectady, NY 12308

Nothing on this page shall supersede the provisions of an Environmental Easement, Consent Order, Consent Decree, agreement, or other legally binding document that affects rights and obligations relating to the site.

Site Owner's Responsibilities:

1) The owner shall follow the provisions of the SMP as they relate to future construction and excavation at the site.

- 2) In accordance with a periodic time frame determined bFor y the NYSDEC, the owner shall periodically certify, in writing, that all Institutional Controls set forth in a(n) Environmental Easement remain in place and continue to be complied with. The owner shall provide a written certification to the RP, upon the RP's request, in order to allow the RP to include the certification in the site's Periodic Review Report (PRR) certification to the NYSDEC.
- 3) In the event the site is delisted, the owner remains bound by the Environmental Easement and shall submit, upon request by the NYSDEC, a written certification that the Environmental Easement is still in place and has been complied with.
- 4) The owner shall grant access to the site to the RP and the NYSDEC and its agents for the purposes of performing activities required under the SMP and assuring compliance with the SMP upon reasonable notice to the owner and tenant/occupant.
- 5) The owner is responsible for assuring the security of the remedial components located on its property to the best of its ability. In the event that damage to the remedial components or vandalism is evident, the owner shall notify the site's RP and the NYSDEC in accordance with the timeframes indicated in Section 1.3 Notifications.
- 6) In the event some action or inaction by the owner adversely impacts the site, the owner must notify the site's RP and the NYSDEC in accordance with the time frame indicated in Section 1.3 Notifications and (ii) coordinate the performance of necessary corrective actions with the RP.
- 7) The owner must notify the RP and the NYSDEC of any change in ownership of the site property (identifying the tax map numbers in any correspondence) and provide contact information for the new owner of the site property. 6 NYCRR Part 375 contains notification requirements applicable to any construction or activity changes and changes in ownership. Among the notification requirements is the following: Sixty days prior written notification must be made to the NYSDEC. Notification is to be submitted to the NYSDEC Division of Environmental Remediation's Site Control Section. Notification requirements for a change in use are detailed in Section 2.4 of the SMP. A 60-Day Advance Notification Form and Instructions are found at http://www.dec.ny.gov/chemical/76250.html.
- 8) In accordance with the tenant notification law, within 15 days of receipt, the owner must supply a copy of any vapor intrusion data, that is produced with respect to structures and that exceeds NYSDOH or OSHA guidelines on the site, whether produced by the NYSDEC, RP, or owner, to the tenants on the property. The owner must otherwise comply with the tenant and occupant notification provisions of Environmental Conservation Law Article 27, Title 24.

Remedial Party Responsibilities

- 1) The RP must follow the SMP provisions regarding any construction and/or excavation it undertakes at the site that is likely to impact the demarcation layer.
- 2) The RP shall report to the NYSDEC all activities required for remediation, operation, maintenance, monitoring, and reporting. Such reporting includes, but is not limited to, periodic review reports and certifications, electronic data deliverables, corrective action work plans and reports, and updated SMPs.
- 3) Before accessing the site property to undertake a specific activity, the RP shall provide the owner advance notification that shall include an explanation of the work expected to be completed. The RP shall provide to (i) the owner, upon the owner's request, (ii) the NYSDEC, and (iii) other entities, if required by the SMP, a copy of any data generated during the site visit and/or any final report produced.
- 4) If the NYSDEC determines that an update of the SMP is necessary, the RP shall update the SMP and obtain final approval from the NYSDEC. Within 5 business days after NYSDEC approval, the RP shall submit a copy of the approved SMP to the owner(s).
- 5) The RP shall notify the NYSDEC and the owner of any changes in RP ownership and/or control and of any changes in the party/entity responsible for the operation, maintenance, and monitoring of and reporting with respect to any remedial system (Engineering Controls). The RP shall provide contact information for the new party/entity. Such activity constitutes a Change of Use pursuant to 375-1.11(d) and requires 60-days prior notice to the NYSDEC. A 60-Day Advance Notification Form and Instructions are found at http://www.dec.ny.gov/chemical/76250.html.
- 6) The RP shall notify the NYSDEC of any damage to or modification of the systems as required under Section 1.3 Notifications of the SMP.
- 7) Prior to a change in use that impacts the remedial system or requirements and/or responsibilities for implementing the SMP, the RP shall submit to the NYSDEC for approval an amended SMP.
- 8) Any change in use, change in ownership, change in site classification (e.g., delisting), reduction or expansion of remediation, and other significant changes related to the site may result in a change in responsibilities and, therefore, necessitate an update to

the SMP and/or updated legal documents. The RP shall contact the Department to discuss the need to update such documents.

Change in RP ownership and/or control and/or site ownership does not affect the RP's obligations with respect to the site unless a legally binding document executed by the NYSDEC releases the RP of its obligations.

Future site owners and RPs and their successors and assigns are required to carry out the activities set forth above.

APPENDIX F GENERIC COMMUNITY AIR MONITORING PLAN

Appendix 1A New York State Department of Health Generic Community Air Monitoring Plan

Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all <u>ground intrusive</u> activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during <u>non-intrusive</u> activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. "Periodic" monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

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overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- 1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.
- 2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- 3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.
- 4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

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- 1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m³) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m³ above the upwind level and provided that no visible dust is migrating from the work area.
- 2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m³ above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m³ of the upwind level and in preventing visible dust migration.
- 3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

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