
WEAVER

BOOS

CONSULTANTS

June 18, 2012
Project Number 0058-373-01

Mr. Todd Gmitro
USEPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604

**Re: PCB Cleanup Completion Report
Former Studebaker Foundry
1100 Prairie Avenue
South Bend, Indiana**

Dear Mr. Gmitro:

Weaver Boos Consultants, LLC (Weaver Boos) has completed the attached PCB Cleanup Completion Report for the referenced site as requested in your letter, dated June 20, 2011.

If you should have any questions or comments concerning this report, please do not hesitate to contact our office.

Sincerely,

Weaver Boos Consultants, LLC



Edward B. Stefanek
Senior Project Manager

Attachments: One hard copy and one electronic copy of the PCB Cleanup Completion Report for Project Number 0058-373-01

cc: Ms. Ann Kolata, City of South Bend
Mr. Doug Stuart, Hull & Associates, Inc.
Mr. George Ritchotte, IDEM

June 18, 2012
Project Number 0058-373-01

**PCB Cleanup Completion Report
Former Studebaker Foundry
1100 Prairie Avenue
South Bend, Indiana**

Prepared for:

The City of South Bend Redevelopment Commission

227 W. Jefferson Blvd #1200
South Bend, IN 46601

CHICAGO, ILLINOIS
NAPERVILLE, ILLINOIS
SPRINGFIELD, ILLINOIS
SOUTH BEND, INDIANA
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FORT WORTH, TEXAS
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CLERMONT, FLORIDA

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LLC

GEO-ENVIRONMENTAL ENGINEERS
AND SCIENTISTS

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1.0 INTRODUCTION

The South Bend Redevelopment Commission (the Property Owner) has demolished the former Studebaker Foundry Building, located at 1100 Prairie Avenue, South Bend (the Site) for future industrial manufacturing development. Prior to demolition, the concrete floor slab associated with three interior rooms (Areas A, B, and C) that formerly were occupied by electrical transformers was screened for the presence of polychlorinated biphenyls (PCBs) to determine disposal options for the material including possible reuse on-site. Areas A and B were adjoining each other. Varying concentrations of PCB-1260 were identified in all of the samples collected. One additional area of PCB impact was also identified (Area D). The project location, building layout, and sample locations are illustrated in the attached Figures. Sample concentrations are tabulated in the attached Tables.

Based on these findings, Weaver Boos Consultants, LLC (Weaver Boos), on behalf of the South Bend Redevelopment Commission, provided to the USEPA a written notification and certification of proposed cleanup and disposal of PCB remediation waste, in accordance with 40 CFR Part 761 Section 761.61 on May 5, 2011. The work plan was approved by the USEPA on June 20, 2011. An amendment to the notification was emailed to the USEPA on October 21, 2011, which also was subsequently approved.

The Property Owner contracted with Dore & Associates to demolish the former foundry building. The site was cleared and is being marketed by the Property Owner for future industrial/manufacturing redevelopment. Dore & Associates was responsible for the transportation and disposal of the PCB-contaminated material (concrete and underlying impacted soil). Disposal options, dependent upon the results of waste characterization, include reuse on-site, disposal of material at a permitted RCRA Subtitle D Landfill, or disposal of material at a permitted RCRA Subtitle C hazardous waste treatment, storage, or disposal (TSD) facility.

Based on the results of the PCB analyses, the entire floor slab associated with Area A was not reused on or off-site and was disposed of at a permitted RCRA Subtitle D landfill (Prairie View Landfill in Wyatt, Indiana). Based on the results of the PCB analyses, the floor slab associated with Area B, minus the southwest corner was disposed of at a permitted RCRA Subtitle C hazardous waste landfill (Wayne Disposal Landfill, Bellville, Michigan) The entire floor slab associated with Area C was also disposed of at a permitted RCRA Subtitle C hazardous waste landfill.

To verify the cleanup of the material, underlying soil sampling and analysis were conducted in accordance with Subpart O of Part 761. With exceptions, if the verification results were less than 7.53 ppm (Indiana 1996 Tier II nonresidential cleanup goals for subsurface soils) then no further remediation activity occurred. Further remediation activity included additional excavation, transportation, and disposal of impacted soils to either Wayne Disposal Landfill or Prairie View Landfill depending on the PCB soil concentrations. Any resultant excavation was backfilled with compacted structural inert fill. During the course of the remedial activities, alternatives were considered when additional excavation was not feasible. These alternatives included restricting areas of the Property to low occupancy, thus enabling PCB-impacted soil \leq 25 ppm to remain on-site.

The Site, and adjoining properties to the north and east, is enrolled in the Indiana Voluntary Remediation Program (VRP) under the 1996 VRP Guidance. The VRP number is 6020803. Weaver Boos prepared a Remediation Work Plan (RWP), dated April 27, 2010, to address the potential environmental conditions encountered at the Site (as a subset of VRP #6020803) during the demolition project. One objective of the project was to remediate any soils that may be encountered during demolition which are impacted above the IDEM 1996 Tier II nonresidential default cleanup standards for PCBs (7.53 ppm). Further cleanup activity including the use of institutional and/or engineering controls to restrict exposure to any remaining PCB impacts (i.e. deed notation to restrict select areas for low occupancy) will be proposed and implemented as part of the overall corrective action completed under the Indiana VRP.

1.1 Site Background Information

The Site is the former Studebaker Foundry located at 1100 Prairie Avenue in South Bend, Indiana (see **Figures 1 and 2** for site location and layout). The 19.2 acre tract was most recently occupied by a plumbing supply company, Underground Pipe and Valve (UP&V), and used for piping materials storage (for road, sewer, and building construction). The Property was completely vacated by the Fall of 2010. Demolition of the former Studebaker Foundry building commenced in January 2011 and was completed in March 2012. The current Property owner is the City of South Bend Redevelopment Commission. The owner's contact person is Ms. Ann Kolata, Senior Redevelopment Specialist, City of South Bend Department of Community and Economic Development, 227 West Jefferson Blvd., South Bend, Indiana 46601 (telephone number: 574-235-9374).

1.2 Remedial Action Objectives

The project included the removal and disposal of nonhazardous and hazardous solid and liquid waste encountered within the demolition limits. The horizontal demolition limits are defined as shown on **Figure 3**. The vertical demolition limit was the vertical extent of the building components (footings, tunnels) which were removed in their entirety. Items identified within the demolition limits that required removal and recycling/disposal included wood block flooring, railroad ties and ballast, contaminated concrete, underground storage tanks and pits, lead-based paint, and foundry waste.

One objective of this demolition project was to remove and/or remediate impacted soils associated with the recognized environmental conditions to below 1996 VRP Tier II nonresidential cleanup levels for applicable COCs including PCBs. Impacted soil above 1996 VRP Tier II nonresidential cleanup levels was removed and disposed of at a designated landfill (PCB-soil or concrete below 50 ppm was disposed of at Prairie View Landfill located in Wyatt, Indiana, PCB-soil or concrete equal or above 50 ppm was disposed of at Wayne Disposal Landfill located in Bellville, Michigan).

1.3 Remedial Actions Undertaken

Based on the evaluation of potential soil remedial alternatives, excavation, removal, and off-site landfill disposal was the selected soil remedial alternative for implementation at this site. Impacted soil above 1996 VRP Tier II Nonresidential Cleanup Criteria was to be removed and disposed of at a designated landfill.

PCB Remedial activities commenced on-site in March 2011. By the end of the demolition project, the following materials were removed.

- 300 tons of PCB-contaminated concrete. 145 tons of concrete (≤ 50 ppm) was disposed of at a Subtitle D landfill (Prairie View Landfill operated by Waste Management in Wyatt, Indiana). 155 tons of concrete (> 50 ppm) was disposed of at a hazardous waste disposal facility (Wayne Disposal Landfill operated by Environmental Quality in Bellville, Michigan).
- 1,330 tons of PCB-contaminated soil (see **Section 2.2.1.2 and 2.2.2.1** for additional information). 170 tons of soil (≤ 50 ppm) was disposed of at Prairie View Landfill. 1,160 tons of soil (> 50 ppm) was disposed of at a Wayne Disposal Landfill.

Supporting documentation (landfill approvals, characterizations, manifests, etc.) that describes the various waste streams and their disposal destinations are provided in **Appendix A**.

2.0 CONFIRMATION SOIL SAMPLING

2.1 Identified Locations of Environmental Concern

Three main areas of environmental concern associated with PCBs (see **Figure 3**) were identified across the Site during demolition activities. These areas of concern included:

- Two Transformer Rooms/PCB Concrete and Soil Impacts
- PCB-impacted Soil

2.1.1 Transformer Rooms

The concrete floor of two empty transformer rooms (TRAB and TRC) (see **Figure 3**) was screened for polychlorinated biphenyls (PCBs) as part of the demolition contract. Results indicated elevated PCBs within the concrete at both locations. Weaver Boos subsequently collected additional concrete samples from both floors to further characterize the PCB impacts. A summary of those results is provided in the May 5, 2011 Self-Implementing PCB Remediation Work Plan submitted to the USEPA and IDEM. In summary, the results indicated that the concrete required removal and disposal at either a hazardous waste disposal facility or Subtitle D landfill. Recycling was prohibited. The work plan also included soil sampling beneath the concrete after it is removed. The sampling was conducted in accordance with Subpart O of 40 CFR 761. The USEPA subsequently approved the work plan on June 20, 2011. PCB-contaminated concrete disposal documentation is provided in **Appendix A**

Transformer Room AB (In Tunnel – 15 feet below grade)

Once the concrete was removed, eleven nine-point composite soil samples were collected on November 23, 2011 beneath the entire transformer room in accordance with the compositing requirements outlined in Subpart O of 40 CFR 761 (see **Figure 3.1A**). The results indicated PCB concentrations above 1996 VRP Tier II nonresidential cleanup criteria. However, six locations contained PCB concentrations that were below the federal low occupancy cleanup criteria of 25 ppm (40 CFR Part 761.61) (see **Table 1**). No additional excavation occurred at these locations due to the location of the impacted soil (greater than 15 feet below surface grade) and subsequent low potential for PCB exposure.

On December 6, 2011, an additional three feet of PCB-impacted soil was removed at the other five sample locations and disposed of at a hazardous waste facility (Wayne Disposal Landfill in

Belleville, Michigan). Depth below the ground surface was 18 feet. Composite samples were collected and tested for PCBs. Results indicated that three areas still contained PCB concentrations above 25 ppm (see **Figure 3.1B**). On December 12, 2011, after another three feet of soil was removed (depth below ground surface is now 21 feet) from the three impacted areas (TRAB-6, TRAB-10, and TRAB-11), additional composite floor samples were collected and tested (see **Figure 3.1C**). In addition, composited sidewall samples were collected and tested for PCBs. Results indicated only one area (TRAB-11) remained impacted at PCB concentrations greater than 25 ppm (see **Figure 3.1D**). Another one foot of soil was removed. Another composited sample was collected on December 19, 2011. The sample was noticeably saturated with groundwater. The PCB concentration was below 25 ppm. No further excavation or sampling was completed. PCB-contaminated soil disposal documentation is provided in **Appendix A**. Analytical results are tabulated in **Table 1**.

Transformer Room C (at grade)

Once the concrete was removed, forty-five discrete soil samples were collected on October 18, 2011 beneath the entire transformer room in accordance with the 1.5 meter grid spacing requirements outlined in Subpart O of 40 CFR 761 (see **Figure 3.2A**). The results indicated PCB concentrations above 1996 VRP Tier II nonresidential cleanup criteria at most locations (see **Table 3B**).

On November 23, 2011, after an additional 3-4 feet of PCB-impacted soil was removed beneath the perimeter of the transformer room and disposed of at a hazardous waste facility (Wayne Disposal Landfill in Belleville, Michigan), nine-point composite samples were collected and tested for PCBs (see **Figure 3.2 B**). Results indicated three areas still contained PCB concentrations above 1996 VRP Tier II nonresidential cleanup criteria. On December 6, 2011, after another 3-4 feet of soil was removed (depth below ground surface is now 8 feet) from the three impacted areas (TRC-1, TRC-4, and TRC-5) (see **Figure 3.2 C**). Results indicated that these same areas plus the area of TRC-9 contained PCB concentrations above 1996 VRP Tier II nonresidential cleanup criteria. Another 4-8 feet of impacted soil was removed and samples were recollected on December 12, 2012 from TRC-1, TRC-4, TRC-5, and TRC-9 (see **Figure 3.2 D**). Composited sidewall samples (TRC-SW-1, SW-2, SW-3, and SW-4) were also collected. The results indicated that PCB-impacted soil above 25 ppm (federal low occupancy PCB cleanup level) remained at TRC-SW-1, TRC-SW-4, and floor sample TRC-4. Additional excavation occurred at TRC-4 down to 16 feet and outward from the two sidewall samples. The

impacted areas were resampled on December 19, 2011 (see **Figure 3.2 E**). Once excavation was complete, the PCB concentrations were below 1996 VRP Tier II nonresidential cleanup criteria. All sample results are tabulated on **Table 2C**.

During the site-wide confirmation sampling (September 22, 2011), elevated PCB concentrations above 1996 VRP Tier II nonresidential cleanup criteria were detected at Test Pit (TP) 44, which is adjacent to the Transformer Room C (see **Figure 3.2 F**). On October 11, 2011, a series of soil probes were located around the near TP-44, west of the transformer room. Discrete samples were collected and tested for PCBs to determine the extent of PCB soil impact outside the transformer room. The results are tabulated on **Table 2A**. Results indicate PCB soil impacts above 1996 closure criteria near the western perimeter of the transformer room. This impacted soil was removed and disposed off-site. Soil samples were collected following excavation (see **Figure 3.2 G**) to verify that soil cleanup was completed. Composite samples were collected on December 15, 2011 from the sidewalls and floor of an excavation ranging from 3-16 feet in depth. Results indicate PCB contamination below the 1996 VRP Tier II nonresidential cleanup criteria.

All PCB-contaminated soil disposal documentation is provided in **Appendix A**. The USEPA and IDEM were notified in October 2011 regarding the additional PCB impacts outside the western transformer room and also near one test pit.

2.1.1.1 PCB-contaminated Soil

During the site-wide confirmation sampling (September 22, 2011), elevated PCB concentrations above 1996 VRP Tier II nonresidential cleanup criteria were detected at Test Pit (TP) 44, which is adjacent to the transformer room (see **Figure 3.2 F**). On October 11, 2011, a series of soil probes were located near TP-44, west of the transformer room. Samples were collected and tested for PCBs, to determine the extent of PCB soil impact outside the transformer room. The results are tabulated on **Table 2A**. Results indicate PCB soil impacts above 1996 closure criteria near the western perimeter of the transformer room. This impacted soil was removed and disposed off-site. Soil samples were collected (see **Figure 3.2 G**) to verify that soil cleanup was completed. Composite samples were collected on December 15, 2011 from the sidewalls and floor of an excavation ranging from 3-16 feet in depth. Results indicate PCB contamination below the 1996 VRP Tier II nonresidential cleanup criteria.

Elevated PCB concentrations above 1996 VRP Tier II nonresidential cleanup criteria were detected at Test Pit 71 (see **Figures 3 and 3.3A**). On October 11, 2011, a series of soil probes were located around TP-71. Samples were collected and tested for PCBs to determine the extent of impact. The results are tabulated on **Table 3**. Results indicated that the PCB impacts were confined to near TP-71. Approximately three feet of PCB-impacted soil was removed and disposed at a hazardous waste landfill. Confirmation samples were collected on November 28, 2011 (see **Figure 3.3B**) from the floor and only two sidewalls of the excavation due to the nearby presence of a tunnel. The results indicated that additional excavation was required at one location (D-3). Samples collected from other locations were below the 1996 VRP Tier II nonresidential cleanup criteria. An additional two feet was removed from that the location of D-3 and resampled on December 6, 2011 (see **Figure 3.3C**). The PCB concentration from the collected sample was less than 1 mg/kg. No further remedial activities were completed.

2.1.2 Quality Assurance Project Plan

A site-specific QAPP was prepared for implementation at the site during remedial activities. This QAPP is a modified version of an earlier QAPP prepared by Hull & Associates, Inc. for US EPA Region 5 Hazardous Substances and Petroleum Brownfields Assessment Grants, submitted in March 2006 and approved on May 30, 2006 and later amended on April 23, 2009. The QAPP was prepared in general accordance with the QAPP Requirements presented in the IDEM's RISC Technical Guide and USEPA's requirements for Quality Assurance Project Plans and the USEPA's Quality Assurance Guidance for Conducting Brownfield Site Assessments. The QAPP was provided as part of the RWP. All laboratory data including Level IV data package is provided in **Appendix B**.

2.1.3 Site Health and Safety Plan

A site-specific Health and Safety Plan (HSP) was prepared prior to the commencement of demolition and soil remedial activities. The HSP was provided for the safety of on-site workers involved in performing corrective actions at the site in accordance with the potential hazards identified at the site. The HSP included details covering the physical and chemical hazards at the site as well as precautions and practices to be used in conducting the work. The HSP was prepared in accordance with the requirements set forth in 29 CFR 1910 and 1926 and the Indiana VRP.

2.1.4 Final Site Restoration

Where impacted soil was removed and disposed off-site, the resultant void was backfilled with suitable on-site fill to near surface grade in accordance with the demolition contract specifications, layered with topsoil, and seeded. The backfill was compacted in accordance with the demolition contract specifications. No excavation was backfilled with imported material.

2.1.5 Land Restrictions

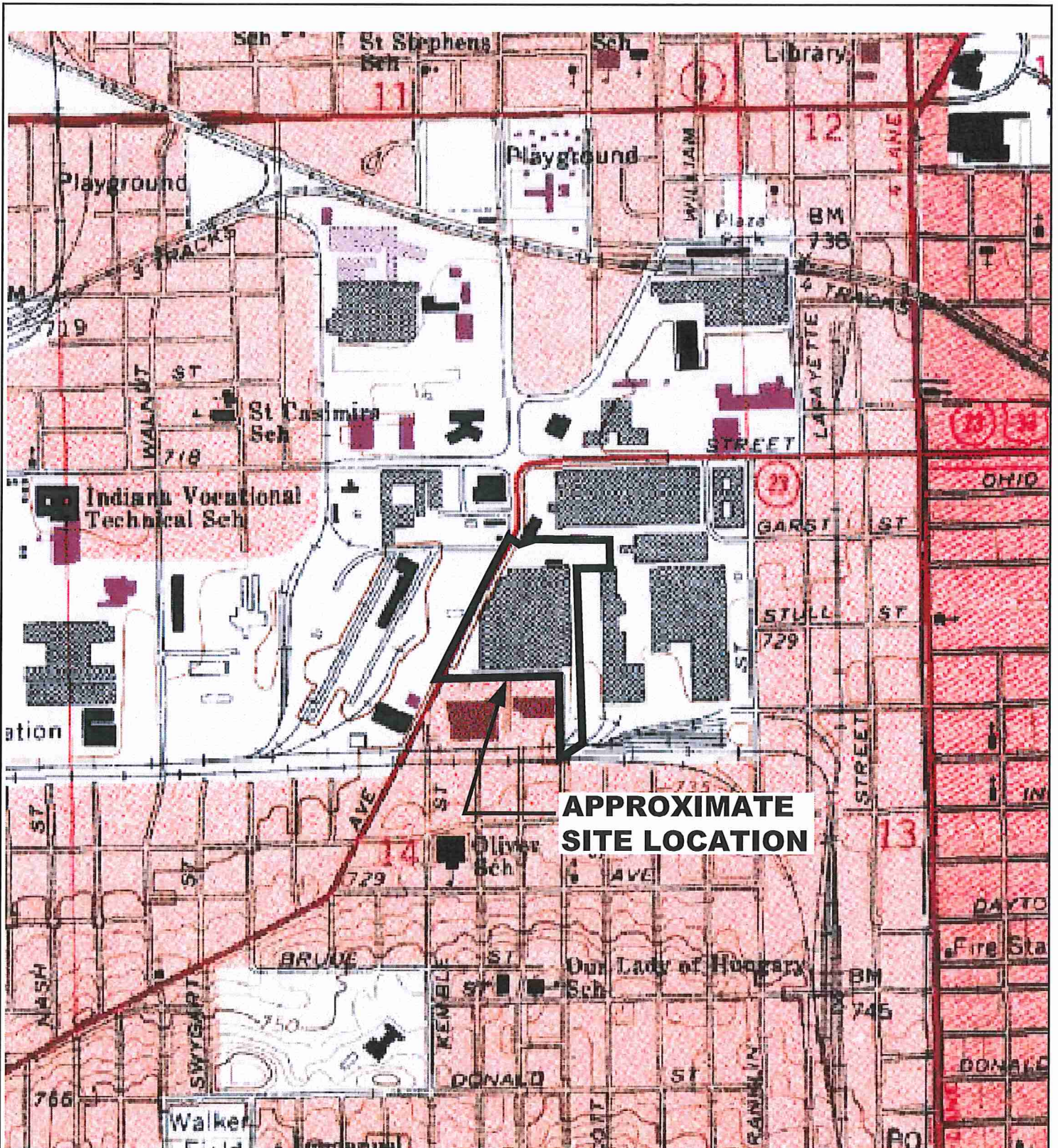
The Site is enrolled in the Indiana Voluntary Remediation Program (VRP) under the 1996 VRP Guidance. The VRP number is 6020803. Weaver Boos prepared a Remediation Work Plan (RWP), dated April 27, 2010, to only address the potential environmental conditions encountered at the Site (as a subset of VRP #6020803) during the demolition project. One objective of the project was to remediate any soils that may be encountered during demolition which are impacted above the IDEM 1996 Tier II nonresidential default cleanup standards for PCBs (7.53 ppm). However, during the course of the remedial activities, alternatives were considered when additional excavation was not feasible. These alternatives included restricting areas of the Property to low occupancy, thus enabling PCB-impacted soil ≤ 25 ppm to remain on-site.

Further cleanup activity including the use of institutional and/or engineering controls to restrict exposure to any remaining PCB impacts \leq (i.e. deed notation to restrict select areas for low occupancy) will be proposed and implemented as part of the overall corrective action yet to be completed by the Property Owner under the Indiana VRP. Since small areas of the Property will be restricted to low occupancy, these control measures will include notifying the USEPA 30 days prior to change of Property ownership. The potential purchaser will state in the notification that it either intends to maintain the low occupancy land use or complete additional corrective action.

A notation on the deed to the Property of these requirements will be recorded. A certification, signed by the Property owner, will be submitted to the USEPA, indicating the he or she has recorded the notation. Since the Property Owner has the Site enrolled in the Indiana VRP, the deed notation will be part of an overall environmental restrictive covenant (ERC) for the Property to be recorded upon completion of the remaining Indiana VRP remedial activities. If the Property Owner elects to no longer participate in the Indiana VRP, a certification noting the recorded low occupancy deed restriction will be forwarded to the USEPA.

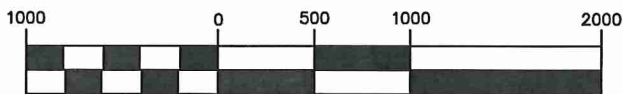
3.0 REFERENCES

- DLZ Indiana. “*Project Manual, Studebaker Area A Demolition Phase IV, Bid Package B, City of South Bend, Board of Public Works*”. June 2010.
- Hull & Associates, Inc., *Phase I Environmental Site Assessment of the Studebaker Area A Properties*, prepared for the City of South Bend Department of Community and Economic Development, December 2000.
- Hull & Associates, Inc., *Report for an Initial Phase II Environmental Site Assessment for the Studebaker Area A Properties*, prepared for the City of South Bend Department of Community and Economic Development, December 2001.
- Hull & Associates, Inc., *Phase I Environmental Site Assessment of the Studebaker Foundry/Underground Pipe and Valve Property, 1100 Prairie Avenue, South Bend, Indiana*, prepared for the City of South Bend, July 2009.
- Hull & Associates, Inc. *Quality Assurance Project Plan Revision 1 for USEPA Region 5 Hazardous Substances and Petroleum Brownfields Assessment Grant, South bend, Indiana*, prepared for the City of South Bend, March 2006 and amended April 23, 2009.

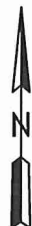


**APPROXIMATE
SITE LOCATION**

APPROXIMATE GRAPHIC SCALE



(IN FEET)
1 inch = 1000 ft.



SITE LOCATION MAP

**FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN**

Weaver Boos Consultants
4085 MEGHAN BEELER COURT
SOUTH BEND, IN 46628
(574) 271-3447

DRAWN BY: RMD

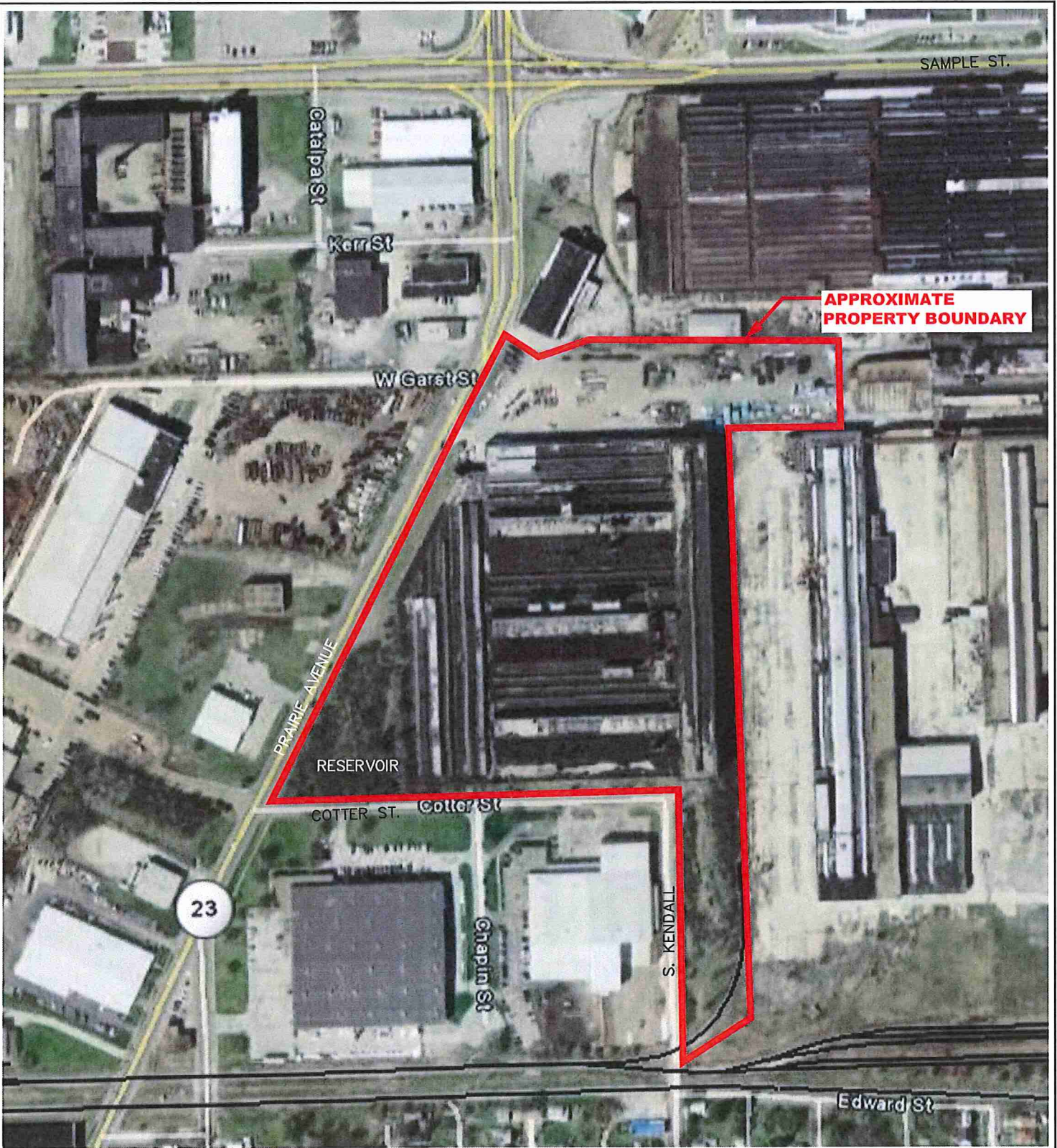
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FILE: 0058-373-01

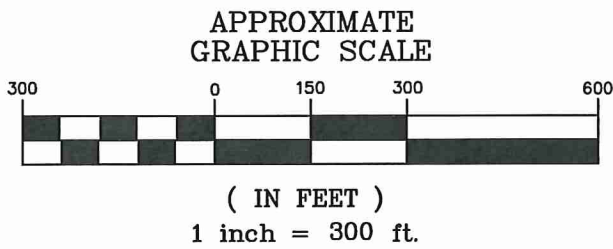
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FIGURE 1



**APPROXIMATE
PROPERTY BOUNDARY**

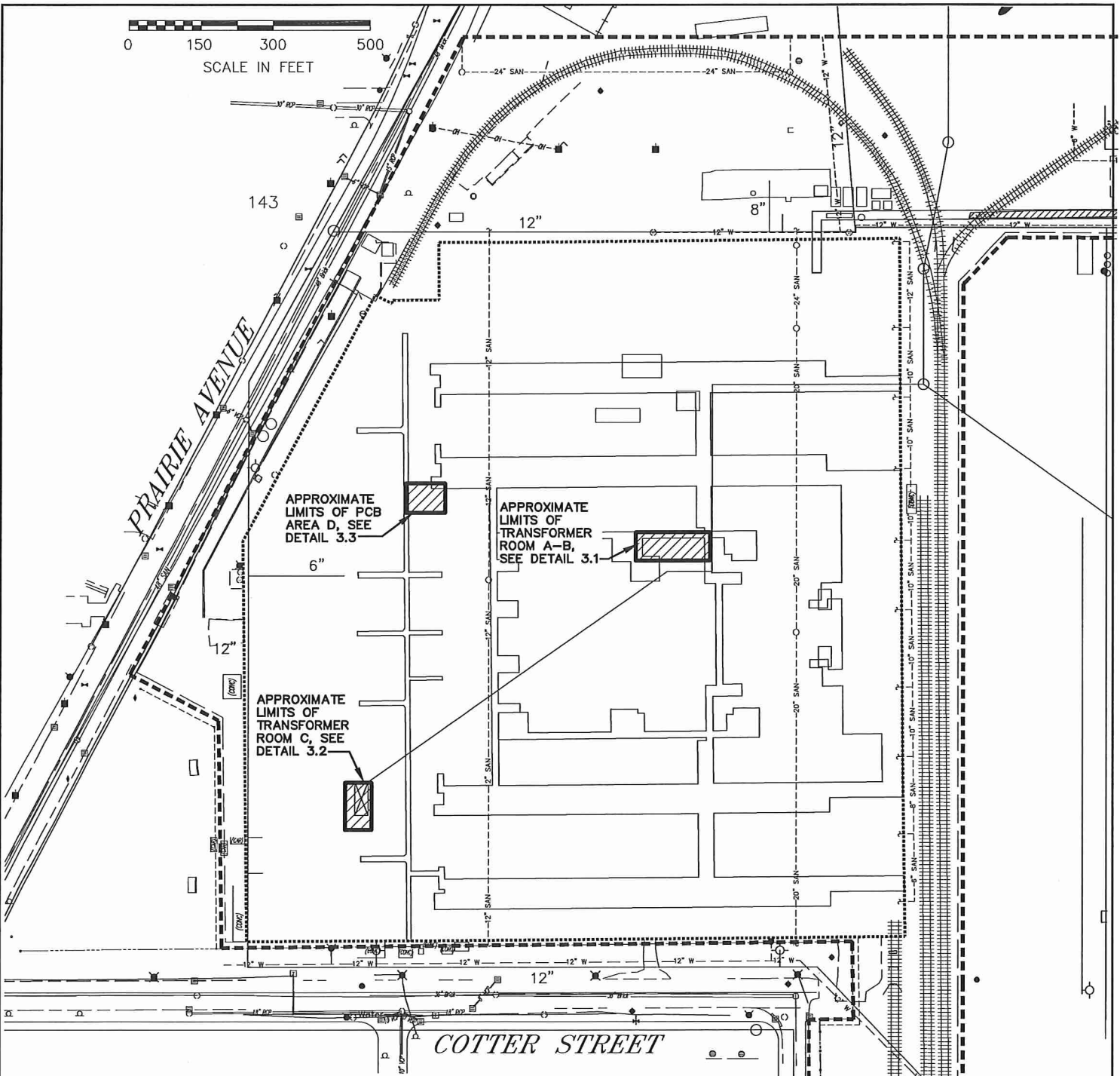


SITE LAYOUT

**FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN**

Weaver Boos Consultants
4085 MEGHAN BEELER COURT
SOUTH BEND, IN 46628
(574) 271-3447

DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: SITELOC.DWG	FIGURE 2



**OVERALL SITE MAP
TRANSFORMER ROOMS & PCBs
LOCATIONS**
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN

Weaver Boos Consultants
4085 MEGHAN BEELER COURT
SOUTH BEND, IN 46628
(574) 271-3447

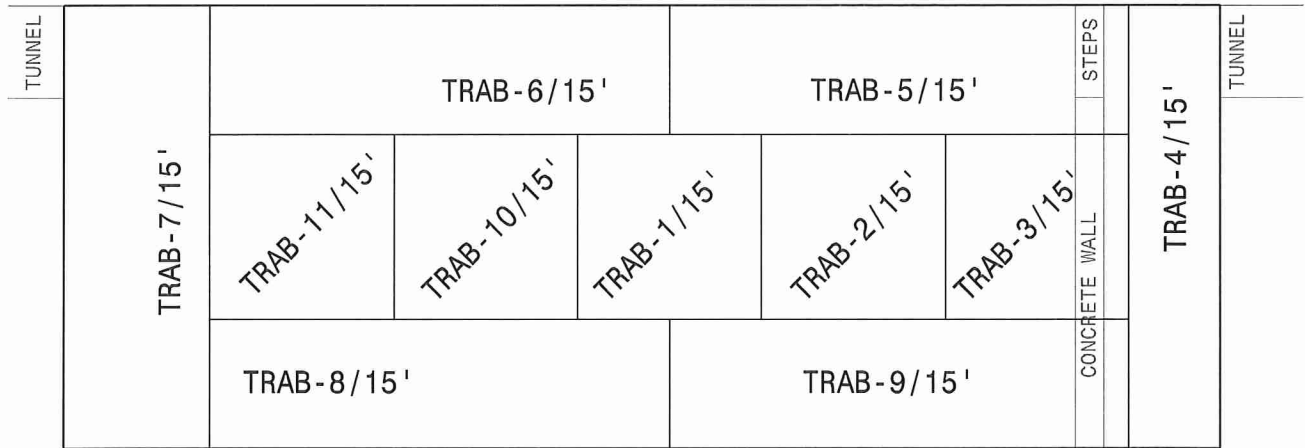
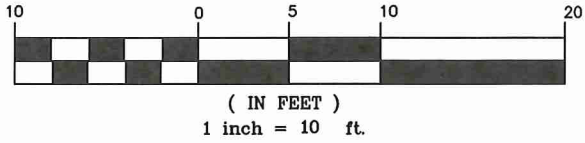
LEGEND:

	MONITORING WELL
	POTENTIAL SOIL BORING
	DRY WELL
	PROPERTY LINE
	EXISTING RAILROAD LINES
	REMOVED RAILROAD LINES
	FENCE LINE
	TUNNELS
	WATER LINE
	SANITARY SEWER LINE W/ DIRECTION
	13,000 VOLT UNDERGROUND ELECTRIC
	TRANSFORMER ROOM W/ PCB CONTAINING FLUID
	MANHOLE
	ELECTRIC MANHOLE
	CATCH BASIN
	FALL PORT
	FIRE HYDRANT
	PUMP HOUSE
	ELEVATOR
	55-GAL. DRUM
	REMOVED TANKS
	STAIN
	STRESSED VEGETATION AND BARE SOIL VEGETATION

DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: SITELOC.DWG	FIGURE 3

SOURCE NOTE: THIS SITE MAP WAS CREATED FROM DRAWINGS PROVIDED BY C. RIGHLEY, C.A. MCCARRISON (DRAWING #56652, 6/78), THE SOWELL COMPANY, HULL & ASSOC., INC. AND DIZ.

APPROXIMATE GRAPHIC SCALE



LEGEND:

TRAB-1 TRAB 11-23-11 SAMPLE LOCATION AREA (COMPOSITE)

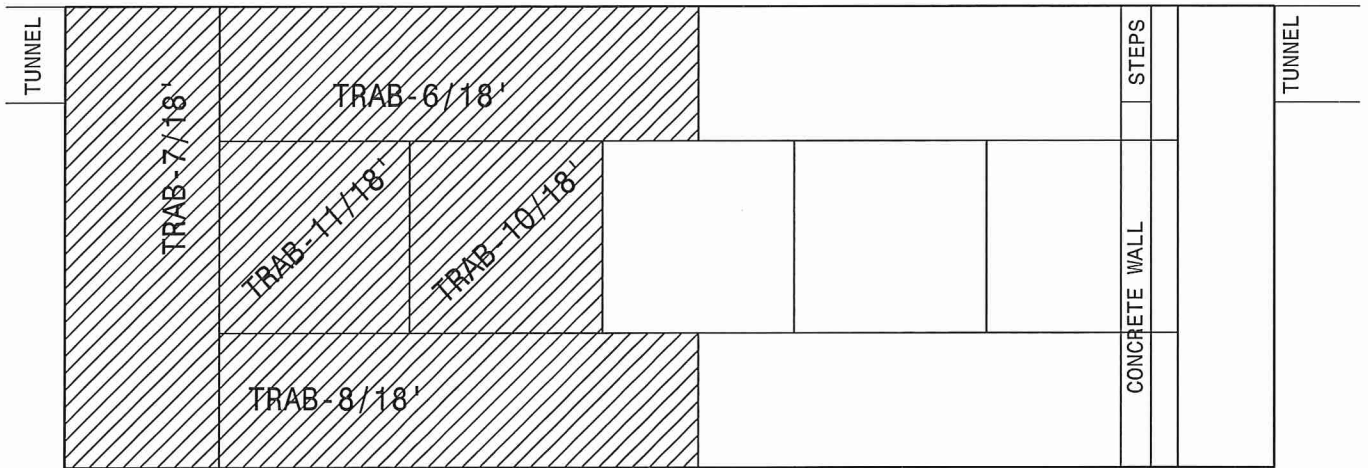
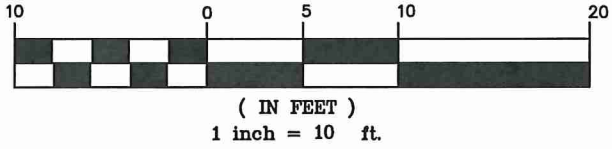


TRANSFORMER ROOM A & B
11-23-2011 SAMPLING EVENT
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN

Weaver Boos Consultants
4085 MEGHAN BEELER COURT
SOUTH BEND, IN 46628
(574) 271-3447

DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	FIGURE 3.1A

APPROXIMATE GRAPHIC SCALE



LEGEND:

TRAB- /18' DENOTES 12-6-11 TRAB SAMPLING LOCATION AREA (COMPOSITE)

 EXCAVATED SOIL

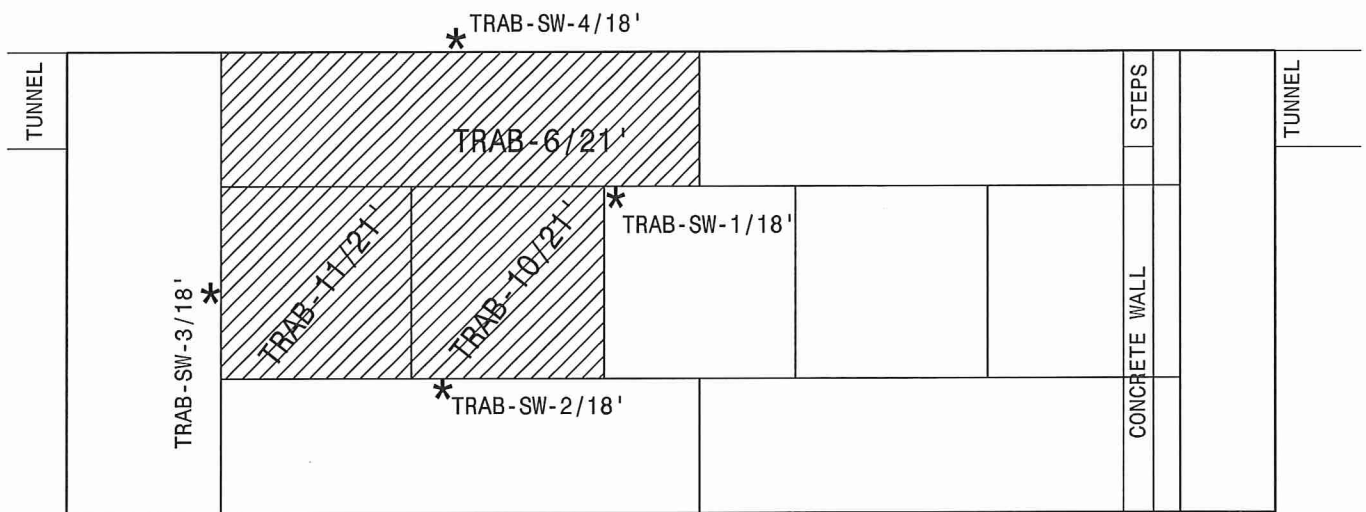
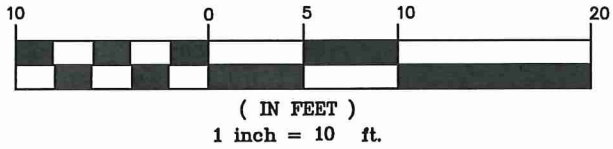


TRANSFORMER ROOM A & B
12-6-2011 SAMPLING EVENT
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN

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SOUTH BEND, IN 46628
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REVIEWED BY: ES	CAD: FIGS.DWG	FIGURE 3.1B

APPROXIMATE GRAPHIC SCALE



LEGEND:

TRAB- /21' DENOTES 12-12-11 TRAB SAMPLING LOCATION AREA (COMPOSITE)

 EXCAVATED SOIL



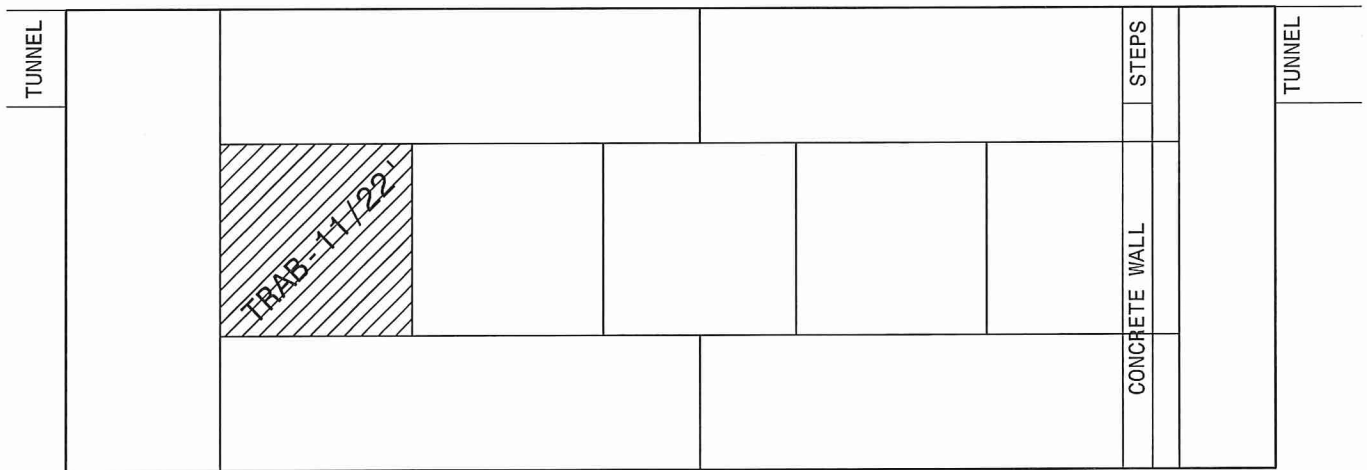
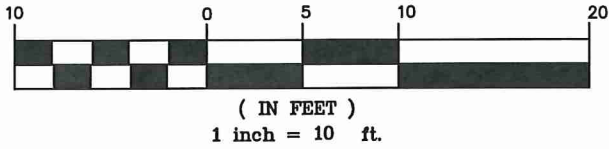
TRANSFORMER ROOM A & B
12-12-2011 SAMPLING EVENT
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN

Weaver Boos Consultants
4085 MEGHAN BEELER COURT
SOUTH BEND, IN 46628
(574) 271-3447

DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	

FIGURE 3.1C

APPROXIMATE GRAPHIC SCALE



LEGEND:

TRAB- /22' DENOTES 12-19-11 TRAB SAMPLING LOCATION AREA (COMPOSITE)

 EXCAVATED SOIL

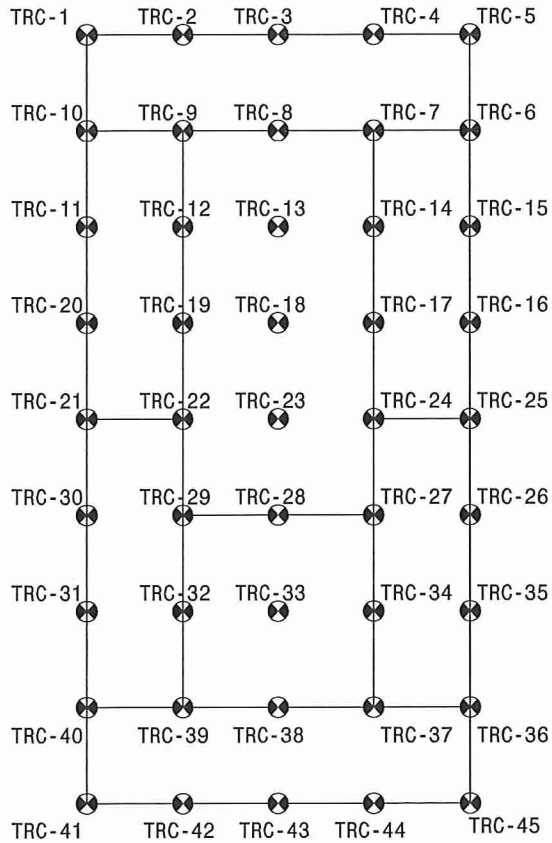
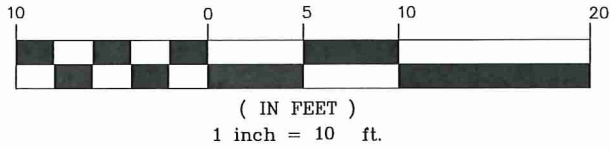


TRANSFORMER ROOM A & B
12-19-2011 SAMPLING EVENT
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN

Weaver Boos Consultants
4085 MEGHAN BEELER COURT
SOUTH BEND, IN 46628
(574) 271-3447

DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	FIGURE 3.1D

APPROXIMATE GRAPHIC SCALE



LEGEND:

TRC-1



DENOTES 10-18-11 TRC SAMPLE LOCATIONS (DISCRETE)



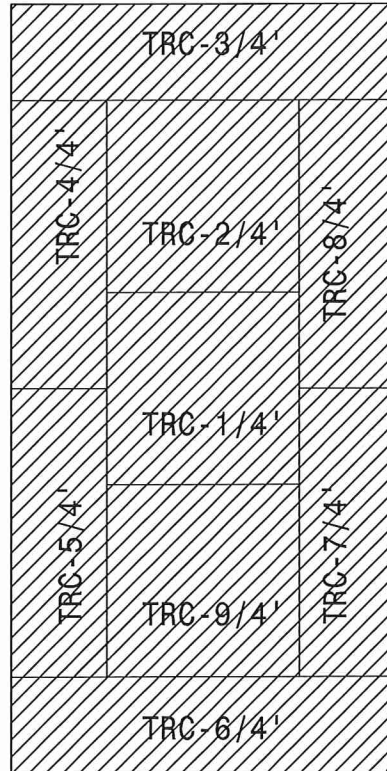
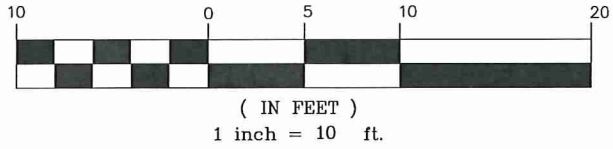
TRANSFORMER ROOM C
 10-18-2011 SAMPLING EVENT
 (BENEATH PAD)
 FORMER STUDEBAKER FOUNDRY
 1100 PRAIRIE AVENUE
 SOUTH BEND, IN

Weaver Boos Consultants

4085 MEGHAN BEELER COURT
 SOUTH BEND, IN 46628
 (574) 271-3447

DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	FIGURE 3.2A

APPROXIMATE GRAPHIC SCALE



LEGEND:

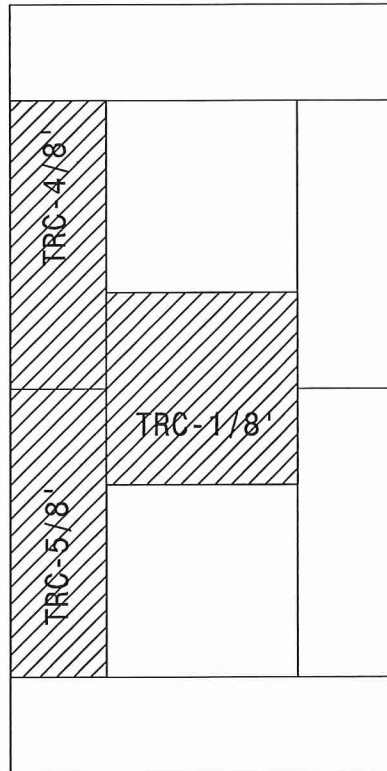
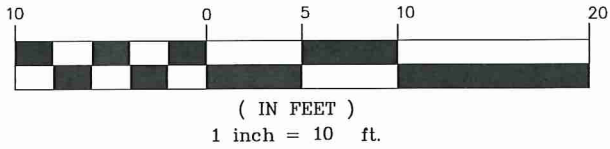
TRC-1/4' DENOTES 11-23-11 TRC SAMPLE LOCATION AREAS (COMPOSITE)

 EXCAVATED SOIL



TRANSFORMER ROOM C 11-23-2011 SAMPLING EVENT (BENEATH PAD) FORMER STUDEBAKER FOUNDRY 1100 PRAIRIE AVENUE SOUTH BEND, IN		
Weaver Boos Consultants 4085 MEGHAN BEELER COURT SOUTH BEND, IN 46628 (574) 271-3447		
DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	FIGURE 3.2B

APPROXIMATE GRAPHIC SCALE



LEGEND:

TRC-1/8' DENOTES 12-6-11 TRC SAMPLING LOCATION AREA (COMPOSITE)

 EXCAVATED SOIL



TRANSFORMER ROOM C
12-6-2011 SAMPLING EVENT
(BENEATH PAD)
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN

Weaver Boos Consultants
4085 MEGHAN BEELER COURT
SOUTH BEND, IN 46628
(574) 271-3447

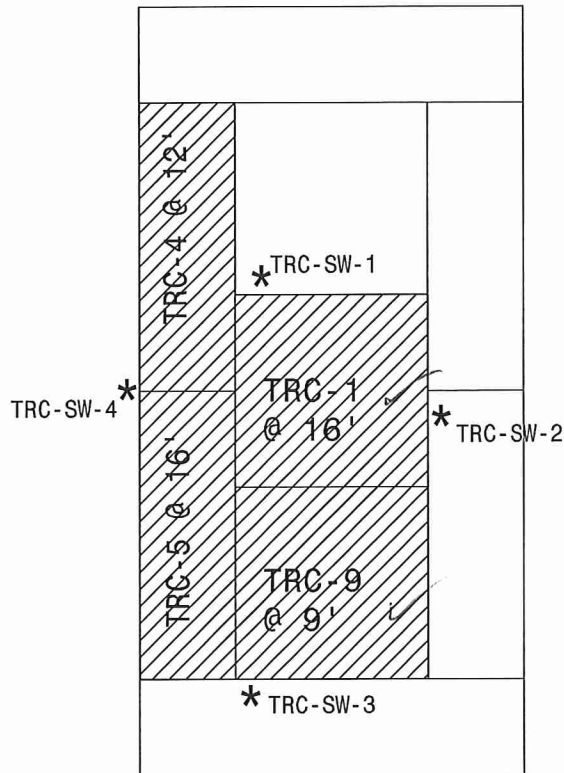
DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	

FIGURE 3.2C

APPROXIMATE GRAPHIC SCALE




(IN FEET)
1 inch = 10 ft.



LEGEND:

TRC-1 DENOTES 12-12-11 TRC SAMPLING LOCATION AREA

 EXCAVATED SOIL



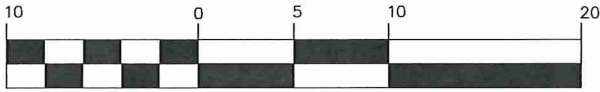
TRANSFORMER ROOM C
12-12-2011 SAMPLING EVENT
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN

Weaver Boos Consultants

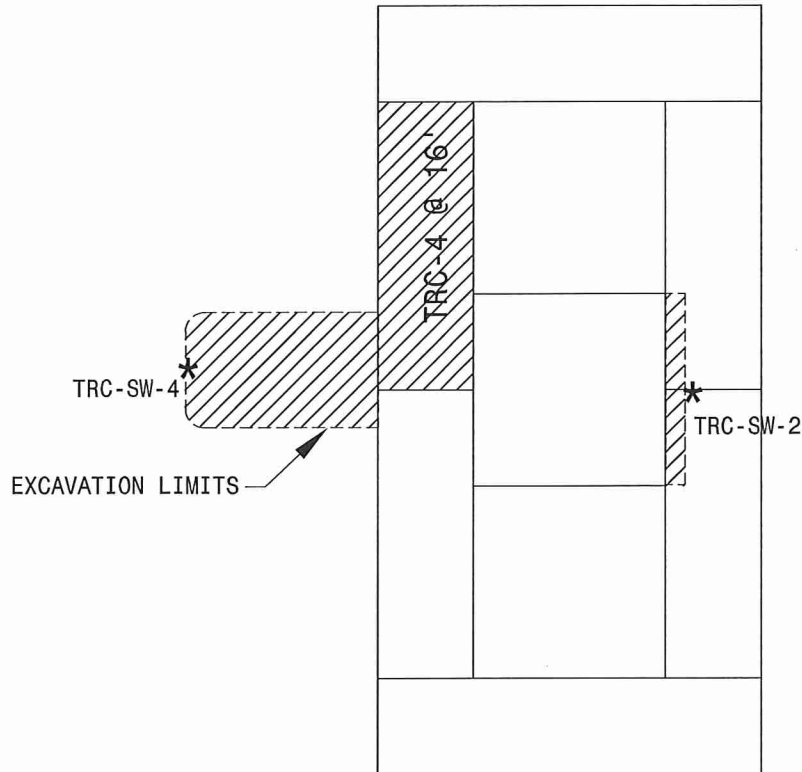
4085 MEGHAN BEELER COURT
SOUTH BEND, IN 46628
(574) 271-3447

DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	FIGURE 3.2D

APPROXIMATE GRAPHIC SCALE



(IN FEET)
1 inch = 10 ft.



LEGEND:

TRC-4 DENOTES 12-19-11 TRC SAMPLING LOCATION AREA

 EXCAVATED SOIL

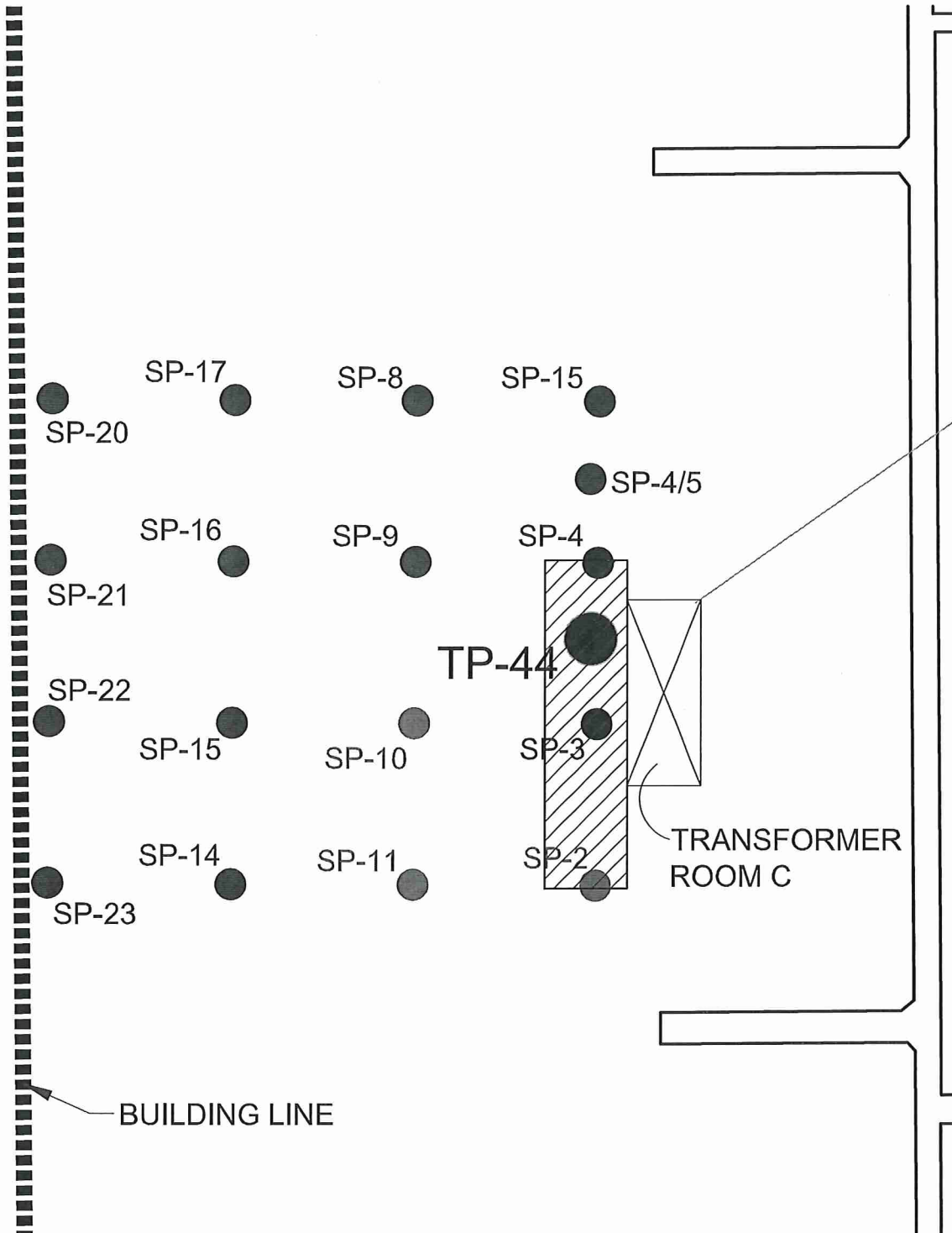


TRANSFORMER ROOM C
12-19-2011 SAMPLING EVENT
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN




Weaver Boos Consultants

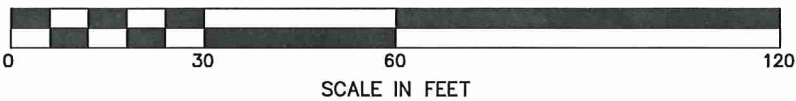
4085 MEGHAN BEELER COURT
SOUTH BEND, IN 46628
(574) 271-3447

DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	FIGURE 3.2E



LEGEND:

-  TP-71
 -  SP-471
 -  AREA OF CONTAMINATED SOIL
- SAMPLE LOCATIONS



SAMPLE PIT LOCATION MAP
WEST OF TRANSFORMER ROOM C
10-11-2011 SAMPLING EVENT
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN

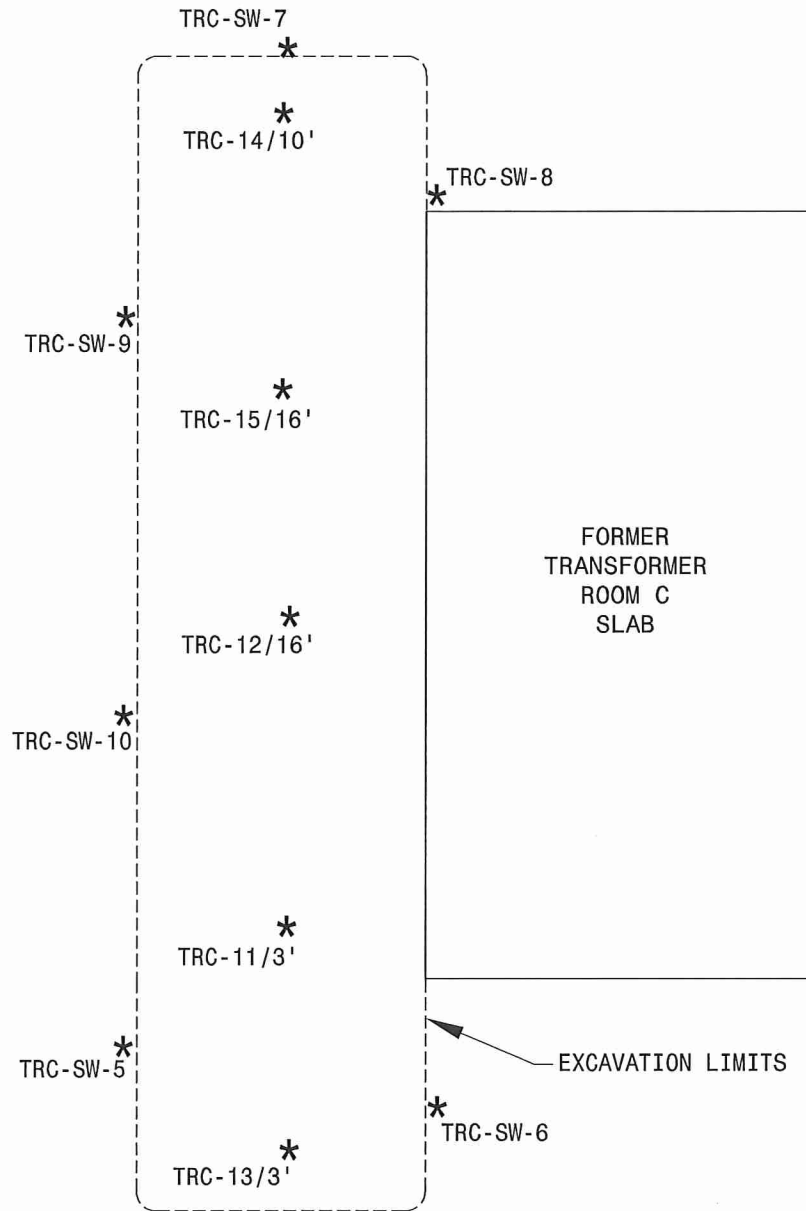
Weaver Boos Consultants
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 SOUTH BEND, IN 46628
 (574) 271-3447

DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: SITELOC.DWG	FIGURE 3.2F

APPROXIMATE GRAPHIC SCALE



(IN FEET)
1 inch = 10 ft.



LEGEND:

TRC- /3' DENOTES 12-15-11 TRC SAMPLING LOCATION AREA

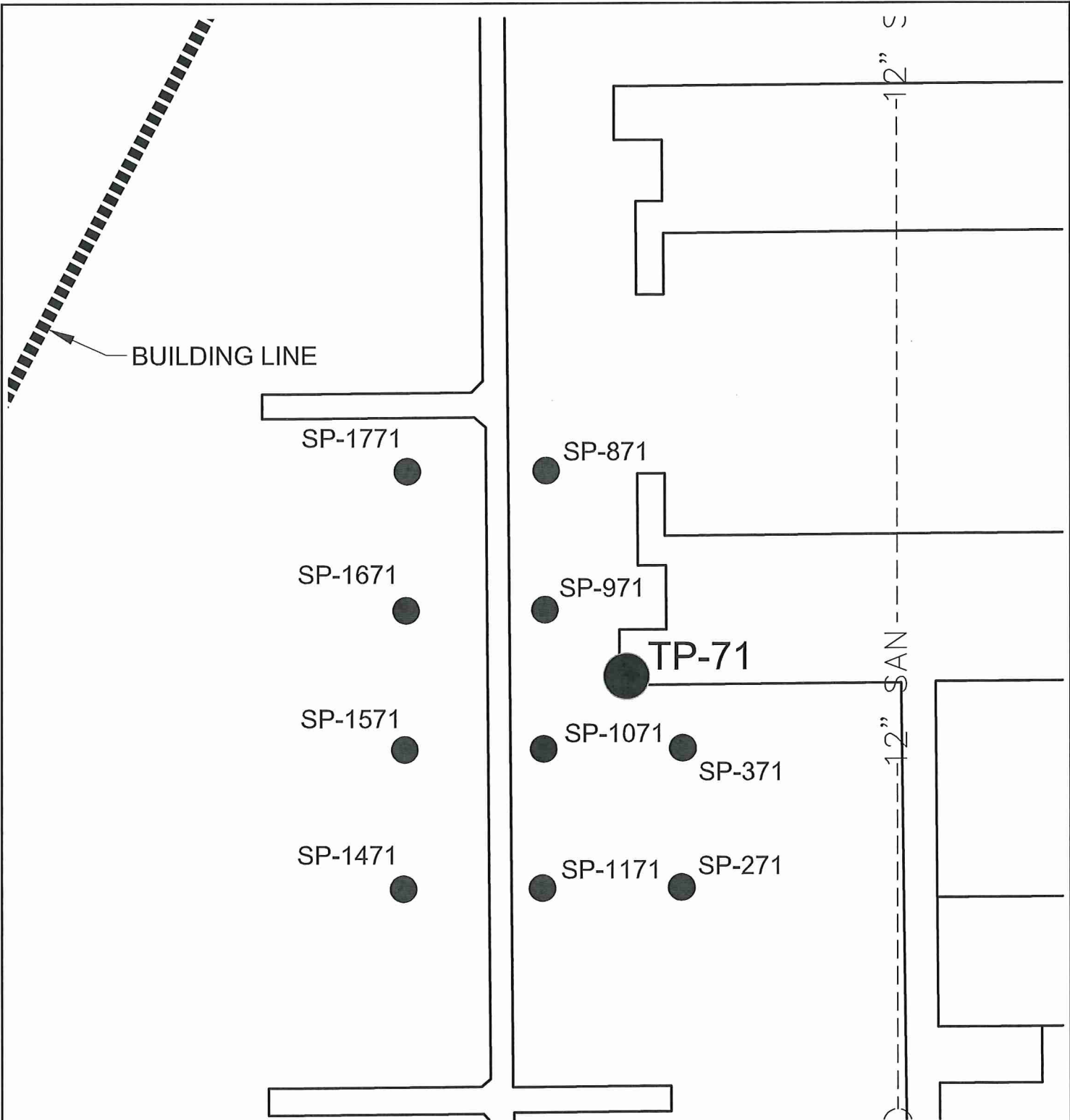


WEST OF TRANSFORMER ROOM C
12-15-2011 SAMPLING EVENT
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN



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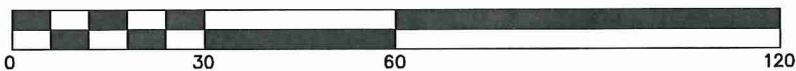
DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	FIGURE 3.2G



LEGEND:

-  TP-71
-  SP-471

SAMPLE LOCATIONS

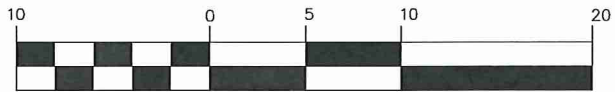


SCALE IN FEET

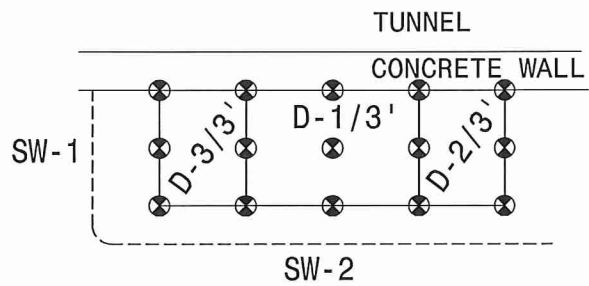


<p>SAMPLE PIT LOCATION MAP AREA D - 10-11-2011 SAMPLING EVENT FORMER STUDEBAKER FOUNDRY 1100 PRAIRIE AVENUE SOUTH BEND, IN</p>		
<p>Weaver Boos Consultants <small>4085 MEGHAN BEELER COURT SOUTH BEND, IN 46628 (574) 271-3447</small></p>		
<p>DRAWN BY: RMD</p>	<p>DATE: 5/7/2012</p>	<p>FILE: 0058-373-01</p>
<p>REVIEWED BY: ES</p>	<p>CAD: SITELOC.DWG</p>	<p>FIGURE 3.3A</p>

APPROXIMATE GRAPHIC SCALE



(IN FEET)
1 inch = 10 ft.



LEGEND:

D-1/3' DENOTES 11-28-11 AREA D SAMPLING LOCATION AREA (COMPOSITE)

⊗ DENOTES AREA D SAMPLE LOCATIONS



AREA D
11-28-11 SAMPLING EVENT
FORMER STUDEBAKER FOUNDRY
1100 PRAIRIE AVENUE
SOUTH BEND, IN

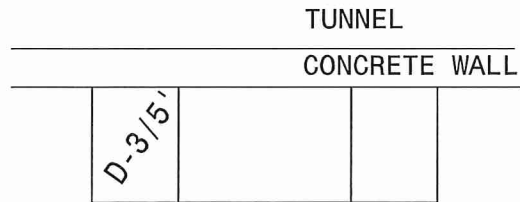
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SOUTH BEND, IN 46628
(574) 271-3447

DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	FIGURE 3.3B

APPROXIMATE GRAPHIC SCALE



(IN FEET)
1 inch = 10 ft.



LEGEND:

D-1/5' DENOTES 12-6-11 TRAB SAMPLING LOCATION AREA (COMPOSITE)



AREA D 12-6-11 SAMPLING EVENT FORMER STUDEBAKER FOUNDRY 1100 PRAIRIE AVENUE SOUTH BEND, IN		
Weaver Boos Consultants 4085 MEGHAN BEELER COURT SOUTH BEND, IN 46628 (574) 271-3447		
DRAWN BY: RMD	DATE: 5/7/2012	FILE: 0058-373-01
REVIEWED BY: ES	CAD: FIGS.DWG	FIGURE 3.3C

Table 1

Transformer Room AB-PCB Soil Closure Sample Results
 November 23, 2011 - December 19, 2011
 Former Studebaker Foundry Demolition
 South Bend, Indiana

Sample ID (Composite)	Depth	Concentration (mg/kg)					1996 VRP TIER II NONRESIDENTIAL CLEAN UP GOALS		CURRENT RISC INDUSTRIAL DEFAULT CLEANUP GOALS	40 CFR PART 761.61 CLEANUP LEVELS (LOW OCCUPANCY AREAS)
		11/23/2011	12/6/2011	12/12/2011	12/19/2011	12/19/2011	Surface Soil (mg/kg)	Subsurface Soils (mg/kg)		
		Surface Soil (mg/kg)		Subsurface Soils (mg/kg)		Soil (mg/kg)	Low Occupancy Areas (mg/kg)			
TRAB-SW-1	18'	---	---	6.1	---	4.23	7.53	5.3	≤25	
TRAB-SW-2	18'	---	---	0.81	---	4.23	7.53	5.3	≤25	
TRAB-SW-3	18'	---	---	<0.21	---	4.23	7.53	5.3	≤25	
TRAB-SW-4	18'	---	---	<0.20	---	4.23	7.53	5.3	≤25	
TRAB-1	15'	15	---	---	---	4.23	7.53	5.3	≤25	
TRAB-2	15'	2.3	---	---	---	4.23	7.53	5.3	≤25	
TRAB-3	15'	13	---	---	---	4.23	7.53	5.3	≤25	
TRAB-4	15'	19	---	---	---	4.23	7.53	5.3	≤25	
TRAB-5	15'	<0.20	---	---	---	4.23	7.53	5.3	≤25	
TRAB-6	15'	120	---	---	---	4.23	7.53	5.3	≤25	
	18'	---	250	---	---	4.23	7.53	5.3	≤25	
	21'	---	---	21	---	4.23	7.53	5.3	≤25	
TRAB-7	15'	100	---	---	---	4.23	7.53	5.3	≤25	
	18'	---	6.1	---	---	4.23	7.53	5.3	≤25	
TRAB-8	15'	74	---	---	---	4.23	7.53	5.3	≤25	
	18'	---	0.41	---	---	4.23	7.53	5.3	≤25	
TRAB-9	15'	6.0	---	---	---	4.23	7.53	5.3	≤25	
	15'	130	---	---	---	4.23	7.53	5.3	≤25	
TRAB-10	18'	---	110	---	---	4.23	7.53	5.3	≤25	
	21'	---	---	3.2	---	4.23	7.53	5.3	≤25	
	15'	420	---	---	---	4.23	7.53	5.3	≤25	
	18'	---	61	---	---	4.23	7.53	5.3	≤25	
TRAB-11	21'	---	---	51	---	4.23	7.53	5.3	≤25	
	22'	---	---	---	1.5	4.23	7.53	5.3	≤25	

40 CFR Part 761.61 cleanup level in high occupancy areas is ≤ 1 ppm

PCB Soil Concentration is above the 1996 VRP Subsurface Soil Cleanup Criteria

PCB Soil Concentration is above the RISC Industrial Default Closure Levels

TRAB- Transformer Room A and B

SW- Sidewall

Table 2A
 Transformer Room C-PCB Characterization Soil Sample Results
 October 11, 2011
 Former Studebaker Foundry Demolition
 South Bend, Indiana

Sample ID (Discrete)	Depth	PCB-1260 Concentration (mg/kg)	1996 VRP TIER II NONRESIDENTIAL CLEAN UP GOALS		CURRENT RISC INDUSTRIAL DEFAULT CLEANUP GOALS	40 CFR PART 761.61 CLEANUP LEVELS (LOW OCCUPANCY AREAS)
			Surface Soil (mg/kg)	Subsurface Soils (mg/kg)		
		10/11/2011				
SP-2	0-2'	17	4.23	7.53	5.3	≤25
	0-2'	330	4.23	7.53	5.3	≤25
SP-3	4-5'	<0.035	4.23	7.53	5.3	≤25
	7-8'	0.091	4.23	7.53	5.3	≤25
SP-4	0-2'	9000	4.23	7.53	5.3	≤25
	4-5'	53	4.23	7.53	5.3	≤25
	7-8'	14	4.23	7.53	5.3	≤25
SP-4/5	0-2'	0.40	4.23	7.53	5.3	≤25
SP-5	0-2'	1.0	4.23	7.53	5.3	≤25
	4-5'	<0.038	4.23	7.53	5.3	≤25
SP-8	0-2'	0.72	4.23	7.53	5.3	≤25
	4-5'	<0.035	4.23	7.53	5.3	≤25
SP-9	0-2'	0.065	4.23	7.53	5.3	≤25
	4-5'	0.067	4.23	7.53	5.3	≤25
	7-8'	<0.037	4.23	7.53	5.3	≤25
SP-10	0-2'	1.4	4.23	7.53	5.3	≤25
	4-5'	<0.035	4.23	7.53	5.3	≤25
	7-8'	<0.038	4.23	7.53	5.3	≤25
SP-11	0-2'	3.6	4.23	7.53	5.3	≤25
SP-14	0-2'	0.047	4.23	7.53	5.3	≤25
	0-2'	0.23	4.23	7.53	5.3	≤25
SP-15	4-5'	<0.035	4.23	7.53	5.3	≤25
	7-8'	<0.038	4.23	7.53	5.3	≤25
SP-16	0-2'	<0.038	4.23	7.53	5.3	≤25
	4-5'	<0.035	4.23	7.53	5.3	≤25
	7-8'	<0.035	4.23	7.53	5.3	≤25
SP-17	0-2'	<0.038	4.23	7.53	5.3	≤25
	4-5'	<0.036	4.23	7.53	5.3	≤25
SP-20	0-2'	0.11	4.23	7.53	5.3	≤25
SP-21	0-2'	0.16	4.23	7.53	5.3	≤25
SP-22	0-2'	<0.037	4.23	7.53	5.3	≤25
SP-23	0-2'	<0.038	4.23	7.53	5.3	≤25

PCB Soil Concentration is above the 1996 VRP Subsurface Soil Cleanup Criteria

PCB Soil Concentration is above the RISC Industrial Default Closure Levels

TRC- Transformer Room C

SP- Soil Probe

Table 2B
 Transformer Room C - PCB Soil Sample Characterization Results
 October 18, 2011
 Former Studebaker Foundry Demolition
 South Bend, Indiana

Sample ID (Discrete)	Depth	PCB-1260 Concentration (mg/kg)	1996 VRP TIER II NONRESIDENTIAL CLEAN UP GOALS		CURRENT RISC INDUSTRIAL DEFAULT CLEANUP GOALS	40 CFR PART 761.61 CLEANUP LEVELS (LOW OCCUPANCY AREAS)
			Surface Soil (mg/kg)	Subsurface Soils (mg/kg)	Soil (mg/kg)	Low Occupancy Areas (mg/kg)
		10/18/2011				
TRC-1	0-1'	580	4.23	7.53	5.3	≤25
TRC-2	0-1'	500	4.23	7.53	5.3	≤25
TRC-3	0-1'	20,000	4.23	7.53	5.3	≤25
TRC-4	0-1'	550	4.23	7.53	5.3	≤25
TRC-5	0-1'	1,500	4.23	7.53	5.3	≤25
TRC-6	0-1'	5,200	4.23	7.53	5.3	≤25
TRC-7	0-1'	1,000	4.23	7.53	5.3	≤25
TRC-8	0-1'	580	4.23	7.53	5.3	≤25
TRC-9	0-1'	9.6	4.23	7.53	5.3	≤25
TRC-10	0-1'	26	4.23	7.53	5.3	≤25
TRC-11	0-1'	33	4.23	7.53	5.3	≤25
TRC-12	0-1'	1.2	4.23	7.53	5.3	≤25
TRC-13	0-1'	12	4.23	7.53	5.3	≤25
TRC-14	0-1'	2,200	4.23	7.53	5.3	≤25
TRC-15	0-1'	1,700	4.23	7.53	5.3	≤25
TRC-16	0-1'	34,000	4.23	7.53	5.3	≤25
TRC-17	0-1'	28	4.23	7.53	5.3	≤25
TRC-18	0-1'	14	4.23	7.53	5.3	≤25
TRC-19	0-1'	11	4.23	7.53	5.3	≤25
TRC-20	0-1'	4.0	4.23	7.53	5.3	≤25
TRC-21	0-1'	33,000 B*	4.23	7.53	5.3	≤25
TRC-22	0-1'	28,000 B*	4.23	7.53	5.3	≤25
TRC-23	0-1'	2,600 B*	4.23	7.53	5.3	≤25
TRC-24	0-1'	26,000 B*	4.23	7.53	5.3	≤25
TRC-25	0-1'	17,000 B*	4.23	7.53	5.3	≤25
TRC-26	0-1'	9,300 B*	4.23	7.53	5.3	≤25
TRC-27	0-1'	4,000 B*	4.23	7.53	5.3	≤25
TRC-28	0-1'	17,000 B*	4.23	7.53	5.3	≤25
TRC-29	0-1'	320 B*	4.23	7.53	5.3	≤25
TRC-30	0-1'	9,900 B*	4.23	7.53	5.3	≤25
TRC-31	0-1'	1,600 B*	4.23	7.53	5.3	≤25
TRC-32	0-1'	2,800 B*	4.23	7.53	5.3	≤25
TRC-33	0-1'	460 B*	4.23	7.53	5.3	≤25
TRC-34	0-1'	57 B*	4.23	7.53	5.3	≤25
TRC-35	0-1'	15,000 B*	4.23	7.53	5.3	≤25
TRC-36	0-1'	9,300 B*	4.23	7.53	5.3	≤25
TRC-37	0-1'	3.1 B*	4.23	7.53	5.3	≤25
TRC-38	0-1'	5.4 B*	4.23	7.53	5.3	≤25
TRC-39	0-1'	12 B*	4.23	7.53	5.3	≤25
TRC-40	0-1'	14,000 B*	4.23	7.53	5.3	≤25
TRC-41	0-1'	6,700	4.23	7.53	5.3	≤25
TRC-42	0-1'	8.3	4.23	7.53	5.3	≤25
TRC-43	0-1'	1.7	4.23	7.53	5.3	≤25
TRC-44	0-1'	2.0	4.23	7.53	5.3	≤25
TRC-45	0-1'	15	4.23	7.53	5.3	≤25

PCB Soil Concentration is above the 1996 VRP Subsurface Soil Cleanup Criteria

PCB Soil Concentration is above the RISC Industrial Default Closure Level

B- Compound was found in the blank and sample

* LCS or LCSD exceeds the control limits

TRC- Transformer Room C

Table 2C
 Transformer Room C - PCB Soil Closure Sample Results
 November 23, 2011 - December 19, 2011
 Former Studebaker Foundry Demolition
 South Bend, Indiana

Sample ID (Composite)	Depth	PCB-1260 Concentration (mg/kg)					PID	1996 VRP TIER II NONRESIDENTIAL CLEAN UP GOALS		CURRENT RISC INDUSTRIAL DEFAULT CLEANUP GOALS	40 CFR PART 761.61 CLEANUP LEVELS (LOW OCCUPANCY AREAS)
		11/23/2011	12/6/2011	12/12/2011	12/15/2011	12/19/2011		Surface Soil (mg/kg)	Subsurface Soils (mg/kg)		
TRC-SW-1	2-3'	0.25	***	***	***	***	***	4.23	7.53	5.3	≤25
	7-8'	***	***	0.47	***	***	***	4.23	7.53	5.3	≤25
TRC-SW-2	2-3'	<0.21	***	***	***	***	***	4.23	7.53	5.3	≤25
	7-8'	***	***	11000	***	***	***	4.23	7.53	5.3	≤25
TRC-SW-3	7-8'	***	***	***	***	<0.21	***	4.23	7.53	5.3	≤25
	2-3'	<0.21	***	***	***	***	***	4.23	7.53	5.3	≤25
TRC-SW-4	7-8'	<0.22	***	***	***	***	***	4.23	7.53	5.3	≤25
	2-3'	***	***	120	***	***	***	4.23	7.53	5.3	≤25
TRC-SW-5	7-8'	***	***	***	***	<0.21	***	4.23	7.53	5.3	≤25
	2'	***	***	***	<0.20	***	***	4.23	7.53	5.3	≤25
TRC-SW-6	2'	***	***	***	<0.22	***	***	4.23	7.53	5.3	≤25
	2'	***	***	***	<0.21	***	***	4.23	7.53	5.3	≤25
TRC-SW-7	2'	***	***	***	<0.21	***	***	4.23	7.53	5.3	≤25
	2'	***	***	***	<0.21	***	***	4.23	7.53	5.3	≤25
TRC-SW-8	2'	***	***	***	<0.21	***	***	4.23	7.53	5.3	≤25
	2'	***	***	***	<0.21	***	***	4.23	7.53	5.3	≤25
TRC-SW-9	2'	***	***	***	<0.21	***	***	4.23	7.53	5.3	≤25
	2'	***	***	***	<0.22	***	***	4.23	7.53	5.3	≤25
TRC-SW-10	2'	***	***	***	<0.22	***	***	4.23	7.53	5.3	≤25
	2'	***	***	***	<0.22	***	***	4.23	7.53	5.3	≤25
TRC-1	4'	590	***	***	***	***	***	4.23	7.53	5.3	≤25
	8'	***	1000	***	***	***	***	4.23	7.53	5.3	≤25
TRC-2	16'	***	***	18	***	***	14.5	4.23	7.53	5.3	≤25
	4'	0.78	***	***	***	***	***	4.23	7.53	5.3	≤25
TRC-3	4'	3.2	***	***	***	***	***	4.23	7.53	5.3	≤25
	4'	62	***	***	***	***	***	4.23	7.53	5.3	≤25
TRC-4	8'	***	850	***	***	***	***	4.23	7.53	5.3	≤25
	12'	***	***	150	***	***	16.8	4.23	7.53	5.3	≤25
TRC-5	16'	***	***	***	***	<0.21	***	4.23	7.53	5.3	≤25
	4'	96	***	***	***	***	***	4.23	7.53	5.3	≤25
TRC-6	8'	***	2200	***	***	***	***	4.23	7.53	5.3	≤25
	16'	***	***	<0.20	***	***	13.6	4.23	7.53	5.3	≤25
TRC-7	4'	0.41	***	***	***	***	***	4.23	7.53	5.3	≤25
	4'	4.1	***	***	***	***	***	4.23	7.53	5.3	≤25
TRC-8	4'	<0.21	***	***	***	***	0.5	4.23	7.53	5.3	≤25
	4'	9.3	***	***	***	***	***	4.23	7.53	5.3	≤25
TRC-9	9'	***	***	24	***	***	***	4.23	7.53	5.3	≤25
	3'	***	***	***	<0.22	***	***	4.23	7.53	5.3	≤25
TRC-10	3'	***	***	***	0.31	***	***	4.23	7.53	5.3	≤25
	3'	***	***	***	<0.22	***	***	4.23	7.53	5.3	≤25
TRC-11	10'	***	***	***	0.33	***	***	4.23	7.53	5.3	≤25
	16'	***	***	***	<0.22	***	***	4.23	7.53	5.3	≤25

PCB Soil Concentration is above the 1996 VRP Subsurface Soil Cleanup Criteria
 PCB Soil Concentration is above the RISC Industrial Default Closure Levels
 TRC- Transformer Room C
 SW- Sidewall

Table 3
Area D - PCB Soil Characterization and Sample Results
 September 23, 2011 - December 6, 2011
 Former Studebaker Foundry Demolition
 South Bend, Indiana

Sample ID	Depth	Concentration (mg/kg)					1996 VRP TIER II NONRESIDENTIAL CLEAN UP GOALS		CURRENT RISC INDUSTRIAL DEFAULT CLEANUP GOALS	40 CFR PART 761.61 CLEANUP LEVELS (LOW OCCUPANCY AREAS)
		9/23/2011	10/11/2011	11/28/2011	12/16/2011	Surface Soil (mg/kg)	Subsurface Soils (mg/kg)	Soil (mg/kg)		
TP-71	0-2'	1100	---	---	---	---	4.23	7.53	5.3	<25
SP-271	0-2'	---	0.080	---	---	---	4.23	7.53	5.3	<25
	4-5'	---	<0.035	---	---	---	4.23	7.53	5.3	<25
SP-371	0-2'	---	0.48	---	---	---	4.23	7.53	5.3	<25
	4-5'	---	<0.035	---	---	---	4.23	7.53	5.3	<25
	7-8'	---	<0.037	---	---	---	4.23	7.53	5.3	<25
SP-871	0-2'	---	<0.036	---	---	---	4.23	7.53	5.3	<25
	4-5'	---	<0.037	---	---	---	4.23	7.53	5.3	<25
SP-971	0-2'	---	0.094	---	---	---	4.23	7.53	5.3	<25
	4-5'	---	<0.035	---	---	---	4.23	7.53	5.3	<25
	7-8'	---	<0.034	---	---	---	4.23	7.53	5.3	<25
SP-1071	0-2'	---	230	---	---	---	4.23	7.53	5.3	<25
	4-5'	---	0.73	---	---	---	4.23	7.53	5.3	<25
	7-8'	---	<0.037	---	---	---	4.23	7.53	5.3	<25
SP-1171	0-2'	---	<0.035	---	---	---	4.23	7.53	5.3	<25
	4-5'	---	<0.035	---	---	---	4.23	7.53	5.3	<25
SP-1471	0-2'	---	<0.036	---	---	---	4.23	7.53	5.3	<25
	4-5'	---	<0.036	---	---	---	4.23	7.53	5.3	<25
SP-1571	0-2'	---	<0.036	---	---	---	4.23	7.53	5.3	<25
	4-5'	---	0.039	---	---	---	4.23	7.53	5.3	<25
SP-1671	0-2'	---	<0.039	---	---	---	4.23	7.53	5.3	<25
	4-5'	---	<0.036	---	---	---	4.23	7.53	5.3	<25
SP-1771	0-2'	---	<0.036	---	---	---	4.23	7.53	5.3	<25
	4-5'	---	<0.038	---	---	---	4.23	7.53	5.3	<25
D-1*	3'	---	---	<0.21	---	---	4.23	7.53	5.3	<25
D-2*	3'	---	---	<0.20	---	---	4.23	7.53	5.3	<25
D-3*	5'	---	---	74	0.56	---	4.23	7.53	5.3	<25
SWD-1*	1-2'	---	---	1.6	---	---	4.23	7.53	5.3	<25
SWD-2*	1-2'	---	---	<0.21	---	---	4.23	7.53	5.3	<25

--- Sample was not collected on this date

* Composite soil sample

PCB Soil Concentration is above the 1996 VRP Subsurface Soil Cleanup Criteria

PCB Soil Concentration is above the RISC Industrial Default Closure Levels

D- Area D Sample Locations

SWD- Sidewalk Area D

TP- Test Pit Sampling Locations

SP- Soil Problem Sampling Locations