

RESPONSE AND DEVELOPMENT WORK PLAN

AREA A: SUB-PARCEL A11-1
TRADEPOINT ATLANTIC
SPARROWS POINT, MARYLAND

Prepared For:



ENVIROANALYTICS GROUP
1515 Des Peres Road, Suite 300
Saint Louis, Missouri 63131

Prepared By:



ARM GROUP INC.
9175 Guilford Road
Suite 310
Columbia, Maryland 20146

ARM Project No. 160443M-17

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Taylor R. Smith".

Taylor R. Smith
Project Engineer

A handwritten signature in black ink, appearing to read "Neil Peters".

T. Neil Peters, P.E.
Senior Vice President

Revision 4 – May 28, 2019

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Soil Data Validation Reports (Phase II only)	Electronic Attachment
Groundwater Laboratory Certificates of Analysis	Electronic Attachment
Groundwater Data Validation Reports (Phase II only)	Electronic Attachment

1.0 INTRODUCTION

ARM Group Inc. (ARM), on behalf of EnviroAnalytics Group (EAG), has prepared this Response and Development Work Plan (RADWP) for a portion of the Tradepoint Atlantic property that has been designated as Area A: Sub-Parcel A11-1 (the Site). Tradepoint Atlantic submitted a letter (**Appendix A**) requesting an expedited remedial plan review to achieve construction deadlines for the proposed development on this Site. The full Parcel A11 comprises roughly 102 acres of the approximately 3,100-acre former plant property located as shown on **Figure 1**. The Sub-Parcel A11-1 consists of 12.7 acres within the eastern portion of Parcel A11. Outside of the main development area designated as Sub-Parcel A11-1, a temporary easement with an area of approximately 1.3 acres within the Limit of Disturbance (LOD) will be utilized to install a force main and pump station to the west.

The conduct of any environmental assessment and cleanup activities on the Tradepoint Atlantic property, as well as any associated development, is subject to the requirements outlined in the following agreements:

- Administrative Consent Order (ACO) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the Maryland Department of the Environment (MDE), effective September 12, 2014; and
- Settlement Agreement and Covenant Not to Sue (SA) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the United States Environmental Protection Agency (USEPA), effective November 25, 2014.

Sub-Parcel A11-1 is part of the acreage that was removed (Carveout Area) from inclusion in the Multimedia Consent Decree between Bethlehem Steel Corporation, the USEPA, and the MDE (effective October 8, 1997) as documented in correspondence received from the USEPA on September 12, 2014. Based on this agreement, USEPA determined that no further investigation or corrective measures will be required under the terms of the Consent Decree for the Carveout Area. However, the SA reflects that the property within the Carveout Area will remain subject to the USEPA's Resource Conservation and Recovery Act (RCRA) Corrective Action authorities.

An application to enter the full Tradepoint Atlantic property (3,100 acres) into the Maryland Department of the Environment Voluntary Cleanup Program (MDE-VCP) was submitted to the MDE and delivered on June 27, 2014. The property's current and anticipated future use is Tier 3 (Industrial), and plans for the property include demolition and redevelopment over the next several years.

In consultation with the MDE, Tradepoint Atlantic affirms that it desires to accelerate the assessment, remediation and redevelopment of certain sub-parcels within the larger site due to current market conditions. To that end, the MDE and Tradepoint Atlantic agree that the Controlled

Hazardous Substance (CHS) Act (Section 7-222 of the Environment Article) and the CHS Response Plan (Code of Maryland Regulations (COMAR) 26.14.02) shall serve as the governing statutory and regulatory authority for completing the development activities on the Sub-Parcel A11-1 and complement the statutory requirements of the VCP (Section 7-501 of the Environment Article). Upon submission of a Site RADWP and completion of any remedial activities for the sub-parcel, the MDE shall issue a No Further Action Letter (NFA) upon a recordation of an environmental covenant describing any necessary land use controls for the specific sub-parcel. At such time that all the sub-parcels within the larger parcel have completed remedial activities, Tradepoint Atlantic shall submit to the MDE a request for issuing a Certificate of Completion (COC) as well as all pertinent information concerning completion of any remedial activities conducted on the parcel. Once the VCP has completed its review of the submitted information it shall issue a COC for the entire parcel described in Tradepoint Atlantic's VCP application.

Alternatively, Tradepoint Atlantic or other entity may elect to submit an application for a specific sub-parcel and submit it to the VCP for review and acceptance. If the application is received after the cleanup and redevelopment activities described in this RADWP are implemented and a NFA is issued by the MDE pursuant to the CHS Act, the VCP shall prepare a No Further Requirements Determination for the sub-parcel.

If Tradepoint Atlantic or other entity has not carried out cleanup and redevelopment activities described in this RADWP, the cleanup and redevelopment activities may be conducted under the oversight authority of either the VCP or the CHS Act, so long as those activities comport with this RADWP.

The Sub-Parcel A11-1 consists of 12.7 acres currently slated for development as a warehouse facility with exterior laydown yards (**Figure 2**). Development activities will generally include grading; construction of a 79,000 square foot building; and paving of parking and laydown areas and roadways. Subsequent site-use would involve workers in the on-site building, and truck drivers entering and leaving the Site with goods.

This RADWP provides a Site description and history; summary of environmental conditions identified by the Phase I Environmental Site Assessment (ESA); summary of environmental conditions identified by the Parcel A11 Phase II Investigation and supplemental sampling activities; a brief discussion of a human health Screening Level Risk Assessment (SLRA) conducted for the identified conditions; and any necessary engineering and/or institutional controls to facilitate the planned development and address the impacts and potential human health exposures. These controls include work practices and applicable protocols that are submitted for approval to support the development and use of the Site. Engineering/institutional controls approved and installed for this RADWP shall be described in closure certification documentation submitted to the MDE demonstrating that exposure pathways on the Site are addressed in a manner that protects public health and the environment. The remaining acreage of Parcel A11 will be

addressed in future work associated with completion of the obligations of the ACO and associated VCP requirements. This work will include assessments of risk and, if necessary, RADWPs to address risks associated with future land use.

2.0 SITE DESCRIPTION AND HISTORY

2.1. SITE DESCRIPTION

The Sub-Parcel A11-1 Development Area consists of 12.7 acres in the eastern portion of Parcel A11 as shown on **Figure 2**. A temporary easement (with an area of approximately 1.3 acres within the LOD) will be utilized to install a force main and pump station to the west of the main development area. The Site is currently zoned Manufacturing Heavy-Industrial Major (MH-IM), and is not occupied. The Sub-Parcel A11-1 Development Area was formerly occupied by a Contractor Area. All historical buildings have been demolished, and the Site has been cleared of all significant vegetation. There is no groundwater use within the Tradepoint Atlantic property.

Sub-Parcel A11-1 is at an average elevation of approximately 13 feet above mean sea level (amsl). Elevations generally range between 11 and 14 feet over Sub-Parcel A11-1, with the exception of a few higher elevations caused by small soil/slag stockpiles. Elevations are fairly uniform at the Site with no clear discharge direction for surface water drainage. According to Figure B-2 of the Stormwater Pollution Prevention Plan (SWPPP) Revision 5 dated June 1, 2017, stormwater from the main development area of Sub-Parcel A11-1 is discharged through the drainage ditch along Peninsula Expressway and into Bear Creek at National Pollutant Discharge Elimination System (NPDES) Outfall 069. Stormwater from the far southern portion of the development area flows toward Bear Creek to the south of Greys Landfill, ultimately discharging at NPDES Outfall 070.

2.2. SITE HISTORY

From the late 1800s until 2012, the production and manufacturing of steel was conducted at Sparrows Point. Iron and steel production operations and processes at Sparrows Point included raw material handling, coke production, sinter production, iron production, steel production, and semi-finished and finished product preparation. In 1970, Sparrows Point was the largest steel facility in the United States, producing hot and cold rolled sheets, coated materials, pipes, plates, and rod and wire. The steel making operations at the facility ceased in fall 2012.

According to the Description of Current Conditions (DCC) Report, prepared by Rust Environment and Infrastructure dated January 1998, several features of potential concern were historically located within the Contractor Area (all of which have been removed), including an earthen oil pit, underground storage tanks (USTs), gas pumps and a pump island, unlabeled drums and containers with evidence of leaking and staining, and a small Coal Tar Area. Numerous features at risk for leaks and releases (drums, tanks, fuel pumps, etc.) have been identified in specific contractor areas within various historical reports. The western portion of the Site was formerly used as a spare parts storage yard. Currently, the Site is largely vacant with piles of stockpiled materials (soil and/or slag). Additional information regarding historical activities conducted within Parcel A11 can be found in the approved Phase II Investigation Work Plan dated May 18, 2016.

3.0 ENVIRONMENTAL SITE ASSESSMENT RESULTS

3.1. PHASE I ENVIRONMENTAL SITE ASSESSMENT

A Phase I ESA was completed by Weaver Boos Consultants for the entire Sparrows Point property on May 19, 2014. Weaver Boos completed site visits of Sparrows Point from February 19 through 21, 2014, for the purpose of characterizing current conditions at the former steel plant. The Phase I ESA identified particular features across the Tradepoint Atlantic property which presented potential risks to the environment. These Recognized Environmental Conditions (RECs) included buildings and process areas where releases of hazardous substances and/or petroleum products potentially may have occurred. The Phase I ESA also relied upon findings identified during a previous visual site inspection (VSI) conducted as part of the RCRA Facility Assessment (RFA) prepared by A.T. Kearney, Inc. dated August 1993, for the purpose of identifying Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) on the property. This 1991 VSI is regularly cited in the DCC Report prepared by Rust Environmental and Infrastructure, dated January 1998 (included with Weaver Boos' Phase I ESA).

Weaver Boos' distinction of a REC or Non-REC was based upon the findings of the DCC Report (which was prepared when the features remained on-site in 1998) or on observations of the general area during their site visit. Weaver Boos made the determination to identify a feature as a REC based on historical information, observations during the site visit, and prior knowledge and experience with similar facilities. The following REC was identified within the Site boundary as defined in the Phase I ESA:

Contractor Equipment Storage (REC 16, Finding 256):

According to the Phase I ESA, a Contractor Area was located directly to the east of Greys Landfill within the boundary of Parcel A11. The Phase I ESA indicated that, based on the DCC Report and interviews with site personnel, this area was previously used as a storage area for contractor equipment, and may have been historically used to dispose of wastes of unknown types and quantities. Further action was recommended in this area due to the potential for surface and subsurface impacts as a result of the storage/dumping activities. Additional historical information regarding the Contractor Area is provided in Section 2.2.

Relevant SWMUs and AOCs were also identified as located in Figure 3-1 from the DCC Report. This figure generally shows the SWMUs, AOCs, and main facility areas within the property boundaries. There were no SWMUs or AOCs identified within the Sub-Parcel A11-1 boundary based on this review.

3.2. PHASE II INVESTIGATION(S)

3.2.1. Parcel A11 Phase II Investigation

A Phase II Investigation specific to soil conditions was performed for the Site in accordance with the requirements outlined in the ACO as further described in the Phase II Investigation Work Plan – Area A: Parcel A11 (Revision 1) dated May 18, 2016. Findings from the original Parcel A11 Phase II Investigation were presented within the Phase II Investigation Report (Revision 0) dated March 27, 2018, and the pertinent findings are summarized in this document.

The Phase II Investigation for soil conditions was developed to target specific features which represented a potential release of hazardous substances and/or petroleum products to the environment, including RECs, SWMUs, and AOCs (discussed above) as well as numerous other targets defined from former operations that would have the potential for environmental contamination. Soil samples were also collected at site-wide locations to ensure full coverage of the parcel. The Phase II Investigation for overall groundwater conditions included collection points distributed regularly throughout and along the perimeter of the Parcel A11 boundary.

A total of 143 soil samples (from 62 boring locations) and 11 shallow groundwater samples were collected for analysis between July 27, 2016 and March 8, 2017 as part of the Parcel A11 Phase II Investigation. Nine additional wells (GL-02 (-5), GL-03 (-3), GL-08 (-3), GL-09 (-2), GL-11 (-1), GL-17 (-1), GL-18 (-3), GL-19, and TS-01 (-7)) are sampled semi-annually as part of the separate Greys Landfill groundwater monitoring, and relevant data collected from these sample locations were included within the Parcel A11 Phase II Investigation Report to supplement the overall groundwater characterization. The relevant soil and groundwater sample locations which provided pertinent data for discussion of the upcoming development of Sub-Parcel A11-1 are shown on **Figure 3** and **Figure 4**, respectively.

Soil and groundwater samples obtained from Parcel A11 were submitted to Pace Analytical Services, Inc. (PACE) and analyzed for the USEPA Target Compound List (TCL) volatile organic compounds (VOCs), TCL semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH) diesel range organics (DRO) and gasoline range organics (GRO), Oil & Grease, USEPA Target Analyte List (TAL) Metals, hexavalent chromium, and cyanide based on the parcel-specific sampling plan. Shallow soil samples collected from 0 to 1 foot below ground surface (bgs) were also analyzed for polychlorinated biphenyls (PCBs). The relevant laboratory Certificates of Analysis (including Chains of Custody) and Data Validation Reports (DVRs) from the Phase II Investigation are included as electronic attachments.

3.2.2. Supplemental Delineation Investigation

During the Phase II Investigation, several soil samples were identified with elevated concentrations of SVOCs, particularly naphthalene. To supplement the original Phase II Investigation, a Work

Plan for the delineation of naphthalene (and associated chemical constituents including benzene and benzo[a]pyrene) was submitted to the MDE and USEPA to facilitate additional soil and groundwater delineation sampling activities in Parcel A11. The scope of the supplemental investigation proposed within the Work Plan has since been greatly expanded from the original scope, and the findings have been periodically reported to the MDE and USEPA. Pertinent findings from the supplemental sampling activities are summarized in this document.

A total of 293 soil samples (from 119 boring locations) and 21 shallow groundwater samples were collected for analysis between June 12, 2018 and August 23, 2018 as part of the supplemental delineation sampling activities. The relevant soil and groundwater sample locations which provided pertinent data for discussion of the upcoming development of Sub-Parcel A11-1 are shown on **Figure 5** and **Figure 6**, respectively. The samples from the original Phase II Investigation are also shown for reference.

Soil and groundwater samples obtained from the supplemental delineation activities were submitted to PACE and analyzed for the TCL-VOCs, PAHs, TPH-DRO/GRO, and Oil & Grease. The relevant laboratory Certificates of Analysis (including Chains of Custody) from the supplemental investigation are included as electronic attachments. These additional samples did not undergo the formal validation process, so DVRs are not provided.

3.2.3. Summary of Results

Soil and groundwater results relevant for the Sub-Parcel A11-1 Development Area were screened against the Project Action Limits (PALs) established in the property-wide Quality Assurance Project Plan (QAPP) dated April 5, 2016, or based on other direct agency guidance (e.g., TPH/Oil & Grease). The PALs for relevant polynuclear aromatic hydrocarbons (PAHs) have been adjusted based on revised toxicity data published by the USEPA. **Table 1** and **Table 2** provide a summary of the detected compounds (organics and inorganics) in the soil samples collected during both the original Phase II Investigation as well as during the supplemental delineation sampling. **Table 3** and **Table 4** provide a summary of the detected compounds (organics and inorganics) in the groundwater samples obtained during both investigations, including the most recent analytical data (May 2018) obtained from the Greys Landfill groundwater monitoring wells.

The PAL exceedances in soil and groundwater are highlighted on the respective detection summary tables. PAL exceedances in soil included four inorganics (arsenic, manganese, thallium, and vanadium), one VOC (benzene), eight SVOCs (benz[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, benzo[k]fluoranthene, chrysene, dibenz[a,h]anthracene, indeno[1,2,3-c,d]pyrene, and naphthalene), TPH-DRO/GRO, and Oil & Grease. PAL exceedances in groundwater included six total/dissolved metals (arsenic, cadmium, cobalt, iron, manganese, and thallium), 10 VOCs (1,1,2,2-tetrachloroethane, 1,1-dichloroethane, 1,2-dibromo-3-chloropropane, benzene, bromodichloromethane, carbon tetrachloride, chloroform, methylene chloride, toluene, and vinyl chloride), 11 SVOCs (1,4-dioxane, 2-methylnaphthalene, benz[a]anthracene,

benzo[a]pyrene, benzo[b]fluoranthene, benzo[k]fluoranthene, dibenz[a,h]anthracene, indeno[1,2,3-c,d]pyrene, naphthalene, n-nitroso-di-n-propylamine, and pyrene), TPH-DRO/GRO, and Oil & Grease.

There were widespread locations within, or adjacent to, the proposed development LOD with soil exceedances of the TPH/Oil & Grease PAL (6,200 mg/kg) and/or potential indications of NAPL in the soil cores. **Figure 7** provides an overview of the distribution of NAPL observed in soil cores within the proposed LOD. Due to the widespread presence of NAPL, utility alignments and inverts must be considered with respect to these impacts prior to trenching.

Although NAPL was observed in numerous locations, free-phase product has not been observed to accumulate in any of the NAPL screening piezometers (gauged at standard 0-hr, 48-hr, and 30-day intervals) or groundwater monitoring points (gauged prior to sampling) that are relevant for the proposed development. A summary of the NAPL gauging status for wells and piezometers near the development LOD is provided as **Figure 8**, indicating that all NAPL screening piezometers have clean 30-day measurements (i.e., no detected presence of NAPL). At this time, all NAPL screening piezometers at the Site have been abandoned. Each piezometer was gauged a final time on the abandonment date in accordance with agency guidance, and NAPL was not detected at any location.

A human health Screening Level Risk Assessment (SLRA) has typically been performed for soils within development sub-parcels to determine potential future risks to Composite Workers and Construction Workers. Based on existing data obtained during the Parcel A11 Phase II Investigation and supplemental delineation sampling, there is a potentially unacceptable risk for future Composite Worker occupants of the Site due to NAPL contamination and associated VOC and SVOC constituents, in particular elevated levels of benzene, benzo[a]pyrene, and naphthalene. These constituents, along with other representative VOCs and SVOCs in Parcel A11 (selected based on prior analysis presented in the Parcel A11 Phase II Investigation Report), are provided in the table below along with concentrations corresponding to baseline carcinogenic risk screening levels of 1E-6 to 1E-4:

Parameter	1E-6 (RSLs)	1E-5	1E-4
	(mg/kg)	(mg/kg)	(mg/kg)
Biphenyl	410	4,100	41,000
Benzene	5.10	51.0	510
Benz(a)anthracene	21.0	210	2,100
Benzo(a)pyrene	2.10	21.0	210
Benzo(b)fluoranthene	21.0	210	2,100
Dibenz(a,h)anthracene	2.10	21.0	210
Indeno(1,2,3-c,d)pyrene	21.0	210	2,100
Naphthalene	17.0	170	1,700

The concentrations associated with 1E-4 were considered to be the delineation thresholds for each individual compound during the preceding delineation activities. However, since the carcinogenic risk is cumulative for PAHs, the delineation thresholds for the three primary risk drivers were set at approximately 1/3 of the concentration corresponding to the risk level of 1E-4, as follows:

Delineation Thresholds	
Benzene	150
Benzo(a)pyrene	75.0
Naphthalene	500

The soil data obtained during the original Phase II Investigation and the supplemental delineation sampling were compared to the listed delineation thresholds. If a soil sample contained a concentration of benzene, benzo[a]pyrene, or naphthalene above one of the specified delineation thresholds, the associated soil boring was flagged with elevated chemical data. Soil borings exhibiting these analytical exceedances were often co-located with observations of NAPL in the soil cores. Based on this screening approach, summaries of elevated soil conditions at the Site are presented in **Figures 9a** (above 5 feet bgs) and **9b** (below 5 feet bgs). As shown on the figures, there are three main areas which are potentially impacted by NAPL and/or associated elevated chemical data. One of these areas is positioned in the eastern portion of the Site and is partially located below the future warehouse building footprint. The remaining areas overlap with the western portion of the LOD, along the temporary easement which will be utilized to install a force main and pump station.

In addition to the confirmed presence of NAPL and elevated chemical data at the Site, groundwater conditions are also a concern. There is no potential for direct exposure to groundwater for a Composite Worker since groundwater is not used on the Tradepoint Atlantic property (and is not proposed to be utilized); however, elevated levels of VOCs and SVOCs in groundwater in the vicinity of the Site could potentially cause an unacceptable vapor intrusion condition for the proposed warehouse building. A summary of groundwater conditions is presented as **Figure 10**, including groundwater elevation contours (developed from depth to water measurements obtained on January 16, 2018) and the most recent analytical data for the main compounds of interest: benzene, benzo[a]pyrene, and naphthalene. Elevated concentrations of one or more of these VOCs/SVOCs were documented at various locations, including below the eastern half of the proposed warehouse building. Elevated aqueous concentrations east of the development boundary may be indicative of past contaminant migration, and a number of downgradient wells are in the process of being installed to define and monitor the downgradient plume. Additional evaluations or response actions for the impacts inside or outside the Sub-Parcel A11-1 boundary may be coordinated with the agencies beyond the scope of this RADWP.

Based on the documented conditions in soil and groundwater, surface engineering controls are proposed at the Site as a containment remedy, supplemented by a sub-slab vapor barrier with a

passive/active venting system to be installed below the building footprint. These measures are proposed to mitigate potential risks to future Composite Workers based on current conditions. During development, all of the required intrusive construction work or activities which require the handling of potentially impacted materials will be performed by Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) trained workers. The use of OSHA HAZWOPER trained workers will mitigate potential risks to Construction Workers by ensuring that the on-site work is performed by personnel who are trained and equipped for the conditions at the Site.

The contractor will develop a site-specific Health and Safety Plan (HASP) which will be applied to all on-site OSHA HAZWOPER trained workers who may be engaged in intrusive construction work or otherwise handle potentially impacted materials. OSHA HAZWOPER trained workers will not be required during construction activities which do not have a significant exposure risk, such as above-grade building construction.

3.3. EVALUATION OF COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) CRITERIA

3.3.1. General

Based on the results and conclusions of the site investigation activities and human health risk screening, this section presents a summary of the identification and evaluation of remedial alternatives for Sub-Parcel A11-1 in general accordance with USEPA guidance under CERCLA. In particular, this section presents the establishment of media cleanup objectives, the identification and initial screening of remedial alternatives for meeting the cleanup objectives, a detailed evaluation of the final remedial alternatives based on the CERCLA evaluation criteria, and a recommendation of the most appropriate remedial alternative based on the evaluation criteria.

3.3.2. Establishment of Media Cleanup Objectives

This section summarizes the cleanup objectives for Sub-Parcel A11-1 based on the results of the site investigation activities, plans for redevelopment of the Site, applicable environmental cleanup regulations, and an evaluation of potential risks to human health and the environment. In general, the cleanup objectives for Sub-Parcel A11-1 are to mitigate potential risks to future Composite Workers and Construction Workers associated with the identified NAPL contamination and associated VOC and SVOC constituents in soil and groundwater. These objectives are further discussed as follows:

- Potential future direct contact risks to NAPLs and contaminated soils should be mitigated through appropriate containment, treatment, or/or removal actions.

- Potential future inhalation risks from VOCs/SVOCs in soil, groundwater and NAPLs should be mitigated through appropriate containment, treatment, or/or removal actions.
- While there are no current or anticipated future exposure pathways to impacted groundwater (since groundwater is not used on the Tradepoint Atlantic property and is not proposed to be used), potential future exposures to contaminated groundwater should be mitigated through use restrictions or treatment. No additional remedial actions are proposed to mitigate the potential migration of NAPL or associated constituents in groundwater below the Site as part of this RADWP. If additional response actions are required to address the presence of NAPL in the subsurface either inside or outside Sub-Parcel A11-1, such measures will be proposed under a separate Work Plan or Work Plans.

3.3.3. Identification of Remedial Alternatives

This section presents the identification of potential remedial alternatives to be evaluated against the threshold screening criteria (i.e., protection of human health and the environment; attainment of media cleanup objectives; and controlling the sources). The potential remedial alternatives were developed based on the media clean-up objectives, communications with the MDE, and professional experience with the identification and screening of remedial alternatives, and consist of the following.

- Alternative 1 – No Action: This alternative does not include the implementation of any remedial activities, and essentially represents leaving the Site in its existing condition. This alternative does not address the media cleanup objectives, but is presented as a baseline condition for comparison purposes.
- Alternative 2 – In-Place Containment with Cap and Vapor Barrier: This alternative has been developed to meet the media cleanup objectives, and generally involves the following major activities: placement of a cap (concrete floor slab of building, asphalt pavement, and/or soil cap) above the areas of contamination to prevent direct contact exposures; installation of a sub-slab vapor barrier and passive venting system that can be upgraded to an active venting and sub-slab depressurization system to restrict the migration of vapors into the proposed new building; utilization of low-permeability utility backfill and/or trench plugs to prevent preferential contaminant migration along utilities that pass through the areas of contamination; and long-term property use restrictions, inspection and maintenance of the cap and vapor barrier systems, and downgradient groundwater monitoring to ensure that the controls remain effective.
- Alternative 3 – In-Situ Treatment by Chemical Stabilization: This alternative represents one of a number of potential in-situ treatment alternatives for the identified contamination. In particular, this alternative would involve the in-situ treatment of the contamination through the injection of specialized chemical reagents using direct push technology or

injection wells. The treatment works as a two-step process, generally consisting of permeability reduction followed by chemical weathering and NAPL encapsulation. The goal of the treatment would be to reduce contaminant concentrations to the point that no additional engineering controls or long-term monitoring would be required. Treatability studies would be required to confirm the effectiveness of the treatment and to refine the application rates and methods.

- Alternative 4 – Removal and Disposal: This alternative has been developed for comparative purposes, and would involve the excavation and off-site disposal of all contaminated soils and NAPLs, above and below the water table. Excavated materials would have to be dewatered, loaded and transported to an approved off-site disposal facility. Any materials that are determined to be RCRA-hazardous would require treatment and disposal at an approved off-site hazardous waste facility. The excavated area would be backfilled with clean fill to facilitate the planned redevelopment.

3.3.4. Initial Screening of Remedial Alternatives

This section presents an initial screening of the identified remedial alternatives against the threshold criteria (i.e., protection of human health and the environment; attainment of media cleanup objectives; and controlling the sources). The screening is summarized as follows:

- Protection of Human Health and the Environment: Alternative 1 (No Action) does not provide adequate protection of human health and the environment because it does not mitigate the identified risks or address the remedial objective. Alternatives 2 through 4 (In-Place Containment, In-Situ Treatment, and Removal and Disposal) have the potential to provide adequate protection of human health and the environment, although Alternative 3 (In-Situ Treatment) and particularly Alternative 4 (Removal and Disposal) have the potential to increase short-term exposure risks in association with waste treatment and handling.
- Attainment of Media Cleanup Objectives: Alternative 1 (No Action) would not meet any of the established media cleanup objectives, while Alternatives 2 through 4 (In-Place Containment, In-Situ Treatment, and Removal and Disposal) would address all of the established media cleanup objectives.
- Controlling the Sources: Historic sources of contamination to the area have previously been eliminated through the decommissioning and removal of the previous steel production operations at the Site. Alternative 1 (No Action) would not provide any additional control of the existing contaminants, although Alternatives 2 through 4 (In-Place Containment, In-Situ Treatment, and Removal and Disposal) would provide varying levels of control with respect to the risks posed by the existing contamination.

Based on this initial screening, Alternative 1 (No Action) does not meet the threshold screening criteria, but Alternatives 2 through 4 (In-Place Containment, In-Situ Treatment, and Removal and Disposal) would meet the threshold criteria and will be retained for detailed evaluation in the following section of this report. Even though the No Action Alternative does not meet the threshold criteria, it has also been retained for detailed evaluation in the following section of this report to provide a baseline condition for comparison purposes.

3.3.5. Detailed Evaluation of Alternatives

This section presents a detailed evaluation of the remedial alternatives that were identified and screened in the previous section. This detailed evaluation has been conducted with respect to the following evaluation/balancing criteria: long-term effectiveness; toxicity, mobility and volume reduction; short-term effectiveness; implementability; community acceptance; state acceptance; and cost. A summary of the detailed evaluation of alternatives is presented on **Table 5**.

3.3.5.1. Long-Term Effectiveness

This criterion refers to the expected effectiveness, reliability and risk of failure of the alternatives, including the effectiveness under analogous site conditions, the potential impact resulting from a failure of the alternative, and the projected useful life of the alternative.

- Alternative 1 – No Action: This alternative is not effective in the long-term because it does not address the identified contamination or exposure pathways of concern.
- Alternative 2 – In-Place Containment with Cap and Vapor Barrier: The proposed capping and vapor control measures have been proven to be effective in the long-term at similar sites with similar conditions. Property use restrictions, and continued inspections, maintenance, and monitoring will ensure the long-term effectiveness of this alternative.
- Alternative 3 – In-Situ Treatment by Chemical Stabilization: The long-term effectiveness of this alternative is currently unknown and would have to be estimated from treatability studies and possibly additional sampling. The treatment measures have the potential to increase contaminant mobility in the long-term because of the required disturbance and chemical changes.
- Alternative 4 – Removal and Disposal: This alternative provides long-term effectiveness through the removal and secure disposal of contaminated materials.

3.3.5.2. Reduction in Toxicity, Mobility, or Volume of Wastes

This criterion generally refers to how much the remedial alternatives will reduce the waste toxicity, mobility and/or volume, primarily through treatment.

- Alternative 1 – No Action: This alternative does not provide any reduction in the toxicity, mobility or volume of the contaminated materials.
- Alternative 2 – In-Place Containment with Cap and Vapor Barrier: This alternative does not provide any reduction in toxicity, mobility or volume through treatment, but the effective treatment of similar waste materials is commonly regarded as technically impracticable. The planned cap and vapor migration controls will help reduce potential contaminant mobility.
- Alternative 3 – In-Situ Treatment by Chemical Stabilization: This alternative has the potential to provide significant reduction in contaminant toxicity, mobility and volume through treatment, but this would need to be confirmed through treatability studies, and in-situ treatment has the potential to increase contaminant mobility.
- Alternative 4 – Removal and Disposal: This alternative does not provide any reduction in toxicity, mobility or volume through treatment. The significant site disturbance associated with this alternative could increase contaminant mobility in the short term.

3.3.5.3. Short-Term Effectiveness

This criterion generally refers to potential short-term risks to on-site workers and the community in association with implementation of the remedial alternatives, such as might be associated with the excavation, handling, treatment, containment, and transportation of contaminated materials.

- Alternative 1 – No Action: This alternative does not increase or decrease short-term exposure risks.
- Alternative 2 – In-Place Containment with Cap and Vapor Barrier: This alternative can be quickly implemented with minimal short-term exposure risks. Any such short-term exposure risks would be mitigated through the implementation of site-specific health and safety controls to be executed by OSHA HAZWOPER trained workers.
- Alternative 3 – In-Situ Treatment by Chemical Stabilization: This alternative would be expected to increase short-term exposure risks through the intrusive disturbance of contaminated materials and the handling of reactive chemicals.
- Alternative 4 – Removal and Disposal: This alternative is expected to significantly increase short-term risks to on-site workers and the community because of the exposure, handling and transportation of a relatively large volume of waste.

3.3.5.4. Implementability

This criterion refers to the relative ease of alternative implementation (construction), including duration, administrative and technical feasibility, and availability of the required services and materials.

- Alternative 1 – No Action: This alternative is not expected to be implementable because it does not address the applicable environmental requirements.
- Alternative 2 – In-Place Containment with Cap and Vapor Barrier: This alternative can be quickly implemented with readily available, typically acceptable, and proven technologies.
- Alternative 3 – In-Situ Treatment by Chemical Stabilization: This alternative presents implementation concerns because it requires specialized equipment and materials, and treatability studies would be required to confirm the technical feasibility.
- Alternative 4 – Removal and Disposal: This alternative presents significant implementation concerns because of potential short-term exposure risks, required air-emission and odor controls, the removal of materials from below the groundwater table, and the handling and transportation of a relatively large volume of waste materials.

3.3.5.5. Community Acceptance

This criterion refers to the known or anticipated community acceptance associated with the remedial alternatives.

- Alternative 1 – No Action: This alternative is not expected to be favorable because it does not address the identified contamination or the remedial objectives.
- Alternative 2 – In-Place Containment with Cap and Vapor Barrier: This alternative is expected to be acceptable because it addresses the remedial objectives without increasing risks to the community.
- Alternative 3 – In-Situ Treatment by Chemical Stabilization: This alternative is potentially acceptable depending on the results of treatability studies and other supplemental studies.
- Alternative 4 – Removal and Disposal: This alternative is potentially acceptable, but the transportation of large volumes of waste through any community is generally not favorable, and fugitive emissions and odors are expected to be a potential concern.

3.3.5.6. State Acceptance

This criterion refers to how the remedial alternatives will comply with applicable environmental regulations (e.g., permit requirements).

- Alternative 1 – No Action: This alternative is not expected to be acceptable because it does not meet the remedial action objectives.
- Alternative 2 – In-Place Containment with Cap and Vapor Barrier: This alternative is expected to be acceptable because it meets the remedial action objectives and can be implemented in a manner consistent with all anticipated regulatory and permitting requirements.
- Alternative 3 – In-Situ Treatment by Chemical Stabilization: This alternative is potentially acceptable depending in the results of treatability and other supplemental studies.
- Alternative 4 – Removal and Disposal: This alternative is potentially acceptable, but the relocation of large volumes of wastes is generally not favorable.

3.3.5.7. Cost

This criterion addresses the anticipated short- and long-term costs associated with implementation of the remedial alternatives.

- Alternative 1 – No Action: This alternative does not have any cost.
- Alternative 2 – In-Place Containment with Cap and Vapor Barrier: The estimated costs for implementation of this alternative (~\$0.3 million) are relatively low in both the short term and long term.
- Alternative 3 – In-Situ Treatment by Chemical Stabilization: The costs for this alternative would depend on the results of treatability studies and subsequent designs, but preliminary estimates from vendor-supplied data and previous experience indicate an anticipated cost of at least \$3 million.
- Alternative 4 – Removal and Disposal: The costs for this alternative would depend on the final volume of materials to be removed, the need for air-emission and other controls during excavation and handling, the amount of excavated material that could be characterized as RCRA-hazardous waste, and costs for off-site transportation, treatment and disposal. Preliminary estimates based on previous experience with similar materials and typical waste transportation and disposal costs indicate anticipated costs of at least \$6 million.

3.3.6. Justification and Recommendation of Remedial Alternative

Based on the detailed evaluation of remedial alternatives as presented in the preceding section(s), **Alternative 2 – In-Place Containment with Cap and Vapor Barrier, is recommended for Sub-Parcel A11-1.** This alternative clearly satisfies the evaluation criteria better than the other potential alternatives, and is an appropriate and favorable remedial alternative for the identified

contamination. Supporting rationale for selection of Alternative 2 – In-Place Containment with Cap and Vapor Barrier is summarized below:

- it satisfies the threshold screening criteria;
- it best satisfies the detailed alternative evaluation criteria;
- it meets the media cleanup goals;
- it can be readily and quickly implemented with proven and reliable technologies;
- it is consistent and compatible with the proposed site development plans;
- it provides for long-term protection of human health and the environment; and
- it can be conducted in accordance with applicable regulations.

4.0 PROPOSED SITE DEVELOPMENT PLAN

Tradepoint Atlantic is proposing to construct a warehouse building and supporting parking and laydown areas on Sub-Parcel A11-1. The proposed development will include improvements on approximately 12.7 acres of land intended for occupancy in the eastern portion of Parcel A11 with the entire Site being fully capped by surface engineering controls. The proposed future use of Sub-Parcel A11-1 is Tier 3 – Industrial. The remainder of Parcel A11 will be addressed in separate development plans in accordance with the requirements of the ACO that will include RADWPs, if necessary. Outside of the main development area designated as Sub-Parcel A11-1, a temporary easement (with a total area of approximately 1.3 acres within the LOD) will be utilized to install a force main and pump station to the west.

Certain compounds are present in the soils located near the surface and in the subsurface at concentrations in excess of the PALs. Therefore, soil is considered a potential media of concern. Potential risks/hazards exist for future adult Composite Workers based on existing impacts to soil including NAPL and chemical constituents exceeding the PALs. Surface engineering controls are required throughout the Site to be protective of future adult Composite Workers by preventing contact with potentially contaminated surface soil (or relocated subsurface soil) at the Site. Based on the existing conditions and following prior discussions with the MDE and USEPA, the entire Site will be subject to surface engineering controls (i.e., capping). In addition, a sub-slab vapor barrier with a passive/active venting system will be installed below the future building footprint.

Construction Workers may contact impacted surface and/or subsurface soil during earth movement activities associated with construction, including the installation of the stormwater utilities outside of the primary development area. All of the required intrusive construction work or activities which require the handling of potentially impacted materials will be performed by OSHA HAZWOPER trained workers. The use of OSHA HAZWOPER trained workers will mitigate potential risks to Construction Workers by ensuring that the on-site work is performed by personnel who are trained and equipped for the conditions at the Site. OSHA HAZWOPER trained workers will not be required during construction activities which do not have a significant exposure risk, such as above-grade building construction.

A restriction prohibiting the use of groundwater for any purpose at the Site will be included as an institutional control in the No Further Action Letter (NFA) and Certificate of Completion (COC) issued by the MDE, and a deed restriction prohibiting the use of groundwater will be filed. These groundwater use restrictions will protect future Composite Workers from potential exposures. Proper water management is required to prevent unacceptable discharges or risks to Construction Workers during development. Work practices and health and safety plans governing groundwater encountered during excavation activities will provide protection for (OSHA HAZWOPER trained) Construction Workers involved with development at the Site.

The development plan for the Site is indicated in **Figure 2**, and the detailed development drawings provided by Morris & Ritchie Associates, Inc. (MRA) are included as **Appendix B**. The process of constructing the proposed warehouse building and support facilities will involve the tasks listed below. As-built and regulatory documentation for the outlined tasks and procedures will be provided in a Sub-Parcel A11-1 Development Completion Report.

4.1. RESPONSE PHASE

4.1.1. Groundwater Network Abandonment

Permanent groundwater monitoring wells LF-03D, LF-04S, and LF-05 were formerly located inside the development boundary as shown on **Figure 11**. Each of the listed monitoring wells was required to be abandoned to facilitate development and to prevent future interruptions at the warehouse facility. In addition, several NAPL screening piezometers (none of which accumulated free-phase product) were formerly located inside the LOD as shown on **Figure 11** and were also required to be abandoned. The well and piezometer abandonments were completed prior to construction activities being initiated at the Site (but following the conditional approval of this RADWP received from the MDE on October 15, 2018) to ensure that the above-ground casings would not be damaged so the groundwater points could be properly abandoned. Each groundwater point was gauged on the final abandonment date in accordance with MDE guidance, and NAPL was not detected at any location. Each groundwater point was then abandoned in accordance with COMAR 26.04.04.34 through 36.

4.1.2. Groundwater Remedies and Monitoring Approach

There is no potential for direct exposure to groundwater for a Composite Worker since groundwater is not used on the Tradepoint Atlantic property (and is not proposed to be utilized); however, elevated levels of VOCs and SVOCs in groundwater in the vicinity of the Site could potentially cause an unacceptable vapor intrusion condition for the proposed warehouse building without additional action. Elevated aqueous concentrations east of the development boundary may be indicative of past contaminant migration. However, the site investigation activities completed to date have indicated the absence of measurable NAPL; therefore, the NAPL does not appear to be highly mobile. Groundwater at the Site is being addressed via the following actions:

- **Capping Remedy with Groundwater Use Restrictions**: The capping remedy (i.e., surface engineering controls) and groundwater use restrictions will be installed at the Site to eliminate direct exposures to contaminants in groundwater. The capping remedy also reduces the potential for additional migration of contaminants into groundwater by reducing the influx of surface water through infiltration.

- **Vapor Barrier** – A vapor barrier remedy will be installed to prevent exposures to organic vapors that have volatilized from groundwater by preventing the migration of vapors through the floor slab and into the building.
- **Groundwater Monitoring** – Groundwater impacts below the Site will be addressed by a combination of the remedies listed above (capping and vapor barrier). To further evaluate groundwater and prevent potential exposures in other areas of the Tradepoint Atlantic property, nine shallow downgradient wells will be installed to define and monitor the downgradient plume. The locations of these downgradient wells are shown in relation to the existing groundwater elevation contours (developed from depth to water measurements obtained on January 16, 2018) on **Figure 12**. The downgradient well network will be subject to long-term groundwater monitoring to observe any change in the distribution or migration of the exiting contaminant plume. Pending the results of the downgradient sampling additional paired wells may be warranted in the future to facilitate groundwater sampling in the intermediate hydrogeologic zone. Any additional evaluations or response actions for the impacts inside or outside the Sub-Parcel A11-1 boundary will be coordinated with the agencies beyond the scope of this RADWP.

4.2. DEVELOPMENT PHASE

4.2.1. Erosion and Sediment Control Installation

Installation of erosion and sediment controls will be completed in accordance with the requirements of the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control prior to any construction at the Site. Any soils which are disturbed during the installation of erosion and sediment controls will be replaced on-site below the cap.

4.2.2. Grading and Site Preparation

As indicated on the development plans in **Appendix B**, site grading will occur within the Sub-Parcel A11-1 boundary. Any material that is not suitable for compaction will be excavated and replaced with subbase material, although it is not anticipated that poor soils will be encountered. Borrow materials will be obtained from MDE-approved sources and will be documented prior to transport to the Site. Processed slag aggregate sourced from the Tradepoint Atlantic property or other materials approved by the MDE for industrial use may be used as fill below the final surface engineering controls. Fill sources shall be free of organic material, frozen material, or other deleterious material. In the case that there is excess material (not anticipated), the spoils will be stockpiled at a suitable location in accordance with the Materials Management Plan (MMP) for the Sparrows Point Facility (Papadopoulos & Associates, et al., June 17, 2015). This work will be coordinated with the MDE accordingly. No excess material will leave the 3,100-acre property without prior approval from the MDE.

4.2.3. Installation of Structures and Underground Utilities

The warehouse facility, parking/laydown areas, and other infrastructure associated with Sub-Parcel A11-1 will be installed at the grades and lines shown on the development plans. Soils relocated or removed during construction may be replaced on-site below the warehouse or exterior areas, but soil removed from utility trenches cannot be used as fill within the utility trenches unless such materials are approved for this use by the VCP. Additional protocols for the installation of utilities at the Site are provided in Section 5.1.2.

Any water removed will be collected to be sampled as described in Section 5.2 and, if acceptable, taken to the on-site wastewater treatment plant. If analytical results indicate the presence of levels of contaminants exceeding levels that are acceptable for treatment at the wastewater treatment plant (as defined in Section 5.2), the water will either be pre-treated through an on-site treatment system and retested prior to being trucked directly to the wastewater treatment plant or will be disposed of at an appropriate off-site facility.

4.2.4. Floor Slabs and Paving

Much of the Site will be covered with floor slabs or paving as indicated in the development plans provided in **Appendix B**. The paved areas will receive a layer of subbase material which will consist of compacted aggregate base, which may include processed slag aggregate sourced from the Tradepoint Atlantic property. Processed slag aggregate sourced from the Tradepoint Atlantic property or other materials approved by the MDE for industrial use may be used as fill below the final surface engineering controls.

The required minimum thicknesses of all site-wide pavement sections which will serve as surface engineering controls are indicated in the general cap sections provided in **Appendix C**. According to the development plans, all paved areas at the Site will be installed with a minimum of 24 inches of compacted aggregate based and a minimum of 4 inches of overlying pavement (asphalt or concrete) surface, which meet these required minimum thicknesses.

4.2.5. Sub-slab Vapor Barrier with Passive/Active Venting System

As noted earlier, a sub-slab vapor barrier with a passive/active venting system (sub-slab depressurization system) will be constructed below the concrete floor slab of the proposed new building to prevent the intrusion of VOC/SVOC vapors to indoor air. The venting system will initially be a passive system, with some negative pressure created below the floor slab through a wind-blown turbine connected to the vent pipes. If indoor air concentrations are later determined to exceed health-based levels based on post-construction indoor air sampling, an electric fan or blower will be connected to the end of the venting system to increase the effectiveness.

The venting system will be split into two separate areas to help provide for better overall flow control and potential isolation of any smaller areas of concern, with solid-walled riser pipes extending to the roof line. The preliminary design of the sub-slab barrier and passive/active venting system is depicted on the attached **Figure 13a/b** through **Figure 15**. The general contractor responsible for construction of the venting system at the Site will be ARCO/Murray.

The vapor barrier will consist of a polyethylene membrane at least 15-mils thick that has been proven to be effective for similar applications. The barrier will be chemically resistant to the anticipated vapor concentrations, and will be sealed at all penetrations, seams, and edges. The manufacturer's information and seaming details for the selected Stego® Wrap vapor barrier are presented in **Appendix D**. Installation methods for the vapor barrier, including methods for ensuring the seams and any penetrations are sealed properly are included in **Appendix D – Vapor Barrier Information** (see "Installation Instructions"). Detailed installation specifications have also been developed and are included in **Appendix D**. The methods for sealing any seams or surface penetrations generally include overlapping pieces of the Stego® Wrap and then sealing with Stego® Tape or Stego® Mastic. The installation of the Stego® Wrap vapor barrier will be performed by a construction crew that will be trained for the installation by a certified technician or engineer from Stego® Industries. The certified technician or engineer will review representative portions of the Stego® Wrap vapor barrier prior to concrete placement, and daily oversight during installation will be provided by the Environmental Professional (EP) providing oversight on the project.

A detailed monitoring program will be developed in the future to ensure sub-slab vapor and indoor air are monitored periodically if the venting system remains passive (see Section 5.5). The monitoring frequency for sub-slab vapor and/or indoor air may be reduced over time depending on the analytical results. The approximate locations of the sub-slab vapor monitoring points are shown on **Figure 13a/b**. One or more of the cleanouts for the sub-slab PVC vapor mitigation system (detailed in **Figure 15**) may be used for additional sub-slab vapor sampling. Minor adjustments to the locations of the vapor monitoring points and/or cleanouts may be necessary during, or prior to, construction based on the final interior layout of the building.

4.2.6. Landscaping

Small areas of the Site will be landscaped between the exterior paved areas. The required minimum thicknesses of all site-wide landscaping sections which will serve as surface engineering controls are indicated in the general cap sections provided in **Appendix C**. According to the development plans, all landscape areas at the Site will be installed with a minimum of 6 inches of clean topsoil overlying 18 inches of clean fill, with an underlying geotextile marker fabric between the clean fill and the underlying materials. The proposed landscape sections meet the minimum capping requirements.

4.2.7. Stormwater Management

The stormwater management plan for the Site is provided within the development plans provided in **Appendix B**. Stormwater infrastructure will be installed throughout the Site and will include the installation of two new stormwater management ponds. The ponds will ultimately discharge toward the northeast into a roadside drainage ditch running along the southern edge of Peninsula Expressway. The required minimum thicknesses of all pond sections which will serve as surface engineering controls are indicated in the general cap sections provided in **Appendix C**. Stormwater ponds at the Site will be installed with an impermeable liner between the existing soil (or fill) and overlying clean fill or stone. Alternatively, a low-permeability clay liner with a minimum thickness of 12 inches may be used in lieu of the impermeable liner, in which case it must also be covered by a minimum of 12 inches of clean fill or stone. If a low-permeability clay liner is used, the material must undergo geotechnical testing and be approved by the MDE prior to its use, as outlined in Section 5.1.5.

Tradepoint Atlantic will work with the MDE Industrial & General Permits Division in 2018 to renew the property-wide NPDES permit. A meeting has already been conducted for this purpose. The stormwater management systems for each parcel are reviewed and approved by Baltimore County for each individual development project. A full plan for the property will be designed once more parcels have been completed and there is a greater understanding of how the overall property will be developed. The agencies will be copied when the management plan is submitted.

5.0 DEVELOPMENT IMPLEMENTATION PROTOCOLS

5.1. DEVELOPMENT PHASE

This plan presents protocols for the handling of soils and fill materials in association with the development of Sub-Parcel A11-1. In particular, this plan highlights the minimum standards for construction practices and managing potentially contaminated materials to reduce potential risks to workers and the environment.

Certain compounds are present in the soils located near the surface and in the subsurface at concentrations in excess of the PALs. The PALs are set based on USEPA's RSLs for industrial soils, or other direct guidance from the MDE. Because PAL exceedances can present potential risks to human health and the environment at certain concentrations, this plan presents material management and other protocols to be followed during the work to adequately mitigate such potential risks for material remaining on-site during the development phase. No soils contaminated with total PCBs in excess of 50 mg/kg have been identified in Sub-Parcel A11-1. There were no samples where detections of lead were identified in excess of 10,000 mg/kg. There were widespread locations within, or adjacent to, the proposed development LOD with soil exceedances of the TPH/Oil & Grease PAL (6,200 mg/kg) and/or potential indications of NAPL in the soil cores. **Figures 9a** and **9b** provide an overview of the distribution of the NAPL and associated elevated chemical impacts in soil within Sub-Parcel A11-1. Due to the widespread presence of NAPL, utility alignments and inverts must be considered with respect to these impacts prior to trenching.

Construction Workers may contact impacted surface and/or subsurface soil during earth movement activities associated with construction, including the installation of the stormwater utilities outside of the primary development area. All of the required intrusive construction work or activities which require the handling of potentially impacted materials will be performed by OSHA HAZWOPER trained workers. The use of OSHA HAZWOPER trained workers will mitigate potential risks to Construction Workers by ensuring that the on-site work is performed by personnel who are trained and equipped for the conditions at the Site. OSHA HAZWOPER trained workers will not be required during construction activities which do not have a significant exposure risk, such as above-grade building construction.

Based on the prior investigation findings, surface engineering controls are required at the Site to be protective of future adult Composite Workers by preventing contact with potentially contaminated surface soil (or relocated subsurface soil) at the Site. Based on the existing conditions and following prior discussions with the MDE and USEPA, the entire Site will be subject to surface engineering controls (i.e., capping). In addition, a sub-slab vapor barrier with a passive/active venting system will be installed below the building footprint. The proposed

pavement caps, landscape caps, and stormwater pond sections will meet the required minimum specifications for surface engineering controls provided in **Appendix C**.

5.1.1. Erosion/Sediment Control

Erosion and sediment controls will be installed prior to commencing work in accordance with 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control. The erosion and sediment controls will be approved by the MDE. In addition, the following measures will be taken to prevent contaminated soil from exiting the Site:

- Stabilized construction entrance will be placed at site entrance.
- A dry street sweeper will be used as necessary on adjacent roads, and the swept dust will be collected and properly managed.
- Accumulated sediment removed from silt fence, and sediment traps if applicable, shall be periodically removed and returned to the Site.

5.1.2. Soil Excavation and Utility Trenching

A pre-excavation meeting shall be held to address proper operating procedures for working on-site and monitoring excavations and utility trenching in potentially contaminated material. This meeting shall include the construction manager and the EP providing oversight on the project. During the meeting, the construction manager and the EP shall review the proposed excavation and trenching locations and any associated utility inverts. The construction manager will be responsible for conveying all relevant information regarding excavation/grading and/or utility work to the site workers who will be involved with these activities. Evidence of NAPL has been observed to be widespread within the development LOD based on prior investigations (see attached summary figures). The Utility Excavation NAPL Contingency Plan must also be reviewed prior to the initiation of intrusive activities. The HASP for the project shall also be reviewed and discussed.

The EP will provide oversight of soil excavation/trenching activities as described in Section 5.6. Soil excavation/trenching will occur during various phases of the proposed construction. In general, excavated materials are expected to be suitable for replacement on the Site. However, the EP will monitor the soil excavation activities for signs of significantly contaminated material which may not be suitable for reuse (as described below). The EP will also be responsible for monitoring organic vapor concentrations in the worker breathing zone within the trenches and will coordinate with the designated Site Safety Officer (provided by the contractor) to determine whether any increased level of health and safety protection is required.

To the extent practical, all excavation activities should be conducted in a manner to minimize double or extra handling of materials. Any stockpiles shall be kept within the Site footprint, and in a location that is not subjected to concentrated stormwater runoff. Stockpiles shall be managed as necessary to prevent the erosion and off-site migration of stockpiled materials, and in

accordance with the applicable provisions of the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control. Soil designated for replacement on-site which does not otherwise exhibit evidence of contamination (as determined by the EP) may be managed in large stockpiles (no size restriction) as long as they remain within the erosion and sediment controls.

All utility trenches will be backfilled with bedding and backfill materials approved by the MDE for industrial use. A general utility cross section is provided as **Appendix E**. Additional preventative measures will be required if evidence of petroleum contamination is encountered, to prevent the discharge to, or migration of, petroleum product along a utility conduit. Contingency measures have been developed to ensure that utilities will be constructed in a manner that will prevent the migration of any encountered NAPL, and that excavated material will be properly managed. The Utility Excavation NAPL Contingency Plan (**Appendix F**) provides protocols to be followed if NAPL is encountered during the construction activities. All utility corridors which pass through areas containing elevated chemical impacts and that have the potential to preferentially transmit contaminated vapors or groundwater along the utility line shall be plugged using 1) low permeability backfill material; or 2) trench plugs in accordance with the details shown on the utility trench plug detail within the Utility Excavation NAPL Contingency Plan. **Figure 16** highlights areas which have already been identified with NAPL or elevated VOC/SVOC impacts in soil or groundwater based on prior investigations. Mitigative measures (i.e., low permeability backfill and/or trench plugs) will be required in these areas; an approximately 25-foot buffer was added surrounding the known impacts to conservatively define the area where mitigative measures shall be implemented to prevent potential migration.

The EP will monitor all soil excavation and utility trenching activities for signs of potential contamination. In particular, soils will be monitored with a hand-held PID for potential VOCs and will also be visually inspected for the presence of staining, petroleum waste materials, or other indications of significant contamination. If screening of excavated materials by the EP indicates the presence of conditions of potential concern (i.e., sustained PID readings greater than 10 ppm, visual staining, unsuitable waste materials, etc.), such materials shall be segregated for additional sampling and special management.

Excavated material exhibiting possible evidence of significant contamination should be placed in stockpiles (not to exceed 500 cubic yards) on polyethylene sheeting and covered with polyethylene sheeting to minimize potential exposures and erosion when not in use. Materials stockpiled due to evidence of contamination will be sampled in accordance with waste disposal requirements, and properly transported to an appropriate permitted disposal facility. Plans for analysis of segregated soils for any use other than disposal must be submitted to the MDE for approval.

Excavated material that is visibly impacted by NAPL will be segregated and managed in accordance with the requirements specified in the Utility Excavation NAPL Contingency Plan. Excavated material with indicators of possible NAPL contamination will also be containerized or placed in a stockpile (not to exceed 500 cubic yards) on polyethylene sheeting and covered with

polyethylene sheeting until the material can be analyzed for TPH/Oil & Grease and PCBs (total) to characterize the material for appropriate disposal. The MDE will be notified if such materials are encountered during excavation or utility trenching activities.

5.1.3. Soil Sampling and Disposal

Excavated materials that are determined by the EP to warrant sampling and analysis because of elevated PID readings or other indicators of potential contamination shall be sampled and analyzed to determine how the materials should be managed. If excavated and stockpiled, such materials should be covered with a polyethylene tarp to minimize potential exposures and erosion. All stockpiled soil may be considered for use as fill at this Site or on other areas of the Tradepoint Atlantic property depending on the analytical results. A sampling work plan including a description of the material, estimated volume, and sampling parameters will be submitted to the MDE for approval. The resulting analytical data will be submitted to the MDE to determine the suitability of the material for reuse. If the MDE determines that the materials are unsuitable for reuse, the materials will be sampled to determine if they are classified as hazardous waste.

Soil material that is determined to be a hazardous waste shall be shipped off-site in accordance with applicable regulations to an appropriate and permitted RCRA disposal facility. Soil material may be taken to an appropriate off-site non-hazardous landfill for proper disposal if the concentrations of excavated sampled materials indicate that the materials are not hazardous, but still are not suitable for reuse. The quantities of all materials that require disposal off-site, if any, will be recorded and identified in the Development Completion Report.

5.1.4. Fill

Processed slag aggregate sourced from the Tradepoint Atlantic property or other materials approved by the MDE for industrial use may be used as fill below the proposed surface engineering controls. Soil excavated on the sub-parcel has been determined to be suitable for re-use at the Site below the surface engineering controls, unless such materials are determined by the EP/MDE to be unsuitable for use as outlined in Section 5.1.2 and Section 5.1.3.

All over-excavated utility trenches will be backfilled with bedding and backfill approved by the MDE for industrial use. As with structural fill, processed slag aggregate and other materials approved for industrial use can be used as backfill in utility trenches since the entire sub-parcel will be covered by a VCP cap. Any utility backfill which will extend into the cap (i.e., top 2 feet of backfill in landscaped areas) must meet the VCP clean fill requirements, and a geotextile marker fabric will be placed between the VCP clean fill and any underlying material. Soil removed from utility trenches cannot be used as fill within the utility trenches unless such materials are approved for this use by the VCP. A general utility detail drawing is provided as **Appendix E**. Material imported to the Site will be screened according to MDE guidance for suitability.

All utility corridors which pass through areas containing elevated chemical impacts and that have the potential to preferentially transmit contaminated vapors or groundwater along the utility line shall be plugged using 1) low permeability backfill material (less than or equal to the permeability of the existing subgrade); or 2) trench plugs in accordance with the details shown in the Utility Excavation NAPL Contingency Plan (**Appendix F**) and referenced on **Figure 16**.

5.1.5. Clay Liner Installation (if applicable)

If a clay liner is used in lieu of the impermeable liner between the existing soil (or fill) and overlying clean fill or stone in the proposed stormwater ponds, the following requirements will be met. As shown in **Appendix C**, the low-permeability clay liner will have a minimum thickness of 12 inches and will be covered by a minimum of 12 inches of clean fill or stone.

Low-permeability clay for the stormwater pond liner construction (if selected) shall consist of relatively homogeneous materials that are not gap-graded or susceptible to soil piping and shall have at least 15% of the material finer than the No. 200 sieve size.

If a clay liner is selected, the EP is responsible for ensuring testing as required to approve the low-permeability clay. An independent geotechnical testing laboratory shall carry out the following advance tests on each off-site source of material proposed for construction of the low-permeability clay liner.

- Standard Proctor – ASTM D 698
- Hydraulic Conductivity Tests – ASTM D 5084

The test results shall be submitted to the EP and the MDE for review and the material shall be approved by both parties prior to transportation to the Site. The low-permeability clay must be compacted to a density that corresponds to a hydraulic conductivity of 1×10^{-5} cm/s or lower as determined during laboratory testing. The in-place moisture content and compaction shall be measured by the EP during construction to match the selected laboratory conditions and verify compliance with the requirements approved by the MDE. Compaction testing shall be conducted with a nuclear density gauge in accordance with ASTM D 6938 at a frequency of at least one test per 2,500 square feet and at least one test per lift. The compacted liner shall be at least 12 inches thick and shall consist of at least two separate lifts of material placed in 8-inch maximum loose lift thickness (or 4 inches where hand-operated equipment is used). Materials that do not meet the compaction, moisture content, and/or other material specifications shall be reworked until acceptable results are obtained, or rejected and replaced with suitable materials.

5.1.6. Dust Control

General construction operations, including soil excavation and transport, and trenching for utilities will be performed at the Site. These activities are anticipated to be performed in areas of soil

impacted with COPCs. Best management practices should be undertaken at the Sparrows Point property as a whole to prevent the generation of dust which could impact other areas of the property outside of the immediate work zone. To limit worker exposure to contaminants borne on dust and windblown particulates, dust monitoring will be performed in the immediate work zone and at the upwind and downwind perimeter of the Site, and dust control measures will be implemented if warranted based on the monitoring results. The action level proposed for the purpose of determining the need for dust suppression techniques (e.g. watering and/or misting) during the development activities at the Site will be 3.0 mg/m³. The lowest of the site-specific dust action levels, OSHA PELs, and ACGIH TLV was selected as the proposed action level.

The EP will be responsible for the dust monitoring program. Air monitoring will be performed using Met One Instruments, Inc. E-Sampler dust monitors or equivalent real-time air monitoring devices. The EP will set-up dust monitoring equipment at the outset of ground intrusive work or other dust-generating activities, and continuous dust monitoring will be performed during this work. In addition to work area monitoring, a dust monitor will be placed at two of the four perimeters of the Site. The selected perimeter locations will correspond to the upwind and downwind boundaries based on the prevailing wind direction predicted for that day. The prevailing wind direction will be assessed during the day, and the positions of the perimeter monitors will be adjusted if there is a substantial shift in the prevailing wind direction.

Once all dust-generating activities are complete (which may occur at a later stage of the project once ground intrusive work has been completed or after the Site has been capped), the dust monitoring program may be discontinued. If additional dust-generating activities commence, additional dust monitoring activities will be performed.

If sustained dust concentrations exceed the action level (3.0 mg/m³) at any of the monitoring locations as a result of conditions occurring at the Site, operations will be stopped temporarily until dust suppression can be implemented. Operations may be resumed once monitoring indicates that dust concentrations are below the action level. The background dust concentration will be utilized to evaluate whether Site activities are the source of the action level exceedance. The background dust concentration will be based on measurements over a minimum of a 1-hour period at the upwind Site boundary. The upwind data will be used to calculate a time weighted average background dust concentration. As noted above, the locations of the perimeter dust monitors may be adjusted periodically if there is a substantial shift in the prevailing wind direction.

As applicable, air monitoring will be conducted during development implementation activities to assess levels of exposure to Site workers, establish that the work zone designations are valid, and verify that respiratory protection being worn by personnel, if needed, is adequate. Concurrent with the work zone air monitoring, perimeter air monitoring will also be performed at the upwind and downwind Site boundaries to ensure contaminants are not migrating off-site. The concentration measured at the downwind perimeter shall not exceed the action level of 3.0 mg/m³, unless caused

by background dust from upwind of the Site. If exceedances of the action level are identified downwind for more than five minutes, the background dust concentration shall be evaluated to determine whether the action level exceedances are attributable to Site conditions. If on-site activities are the source of the exceedances, dust control measures and additional monitoring will be implemented. The dust suppression measures may include wetting or misting using a hose connected to an available water supply or a water truck stationed at the Site.

Dust control measures will be implemented as described above to address dust generated as a result of construction activities conducted at the Site. However, based on the nature of the area and/or on-going activities surrounding the Site, it is possible that windblown particulates may come from surrounding areas. As discussed above, the dust concentration in the upwind portion of the Site will be considered when monitoring dust levels in the work area. A pre-construction meeting will be held to discuss the potential of windblown particulates from other activities impacting the air monitoring required for this RADWP. Site contact information will be provided to address the possibility of upwind dust impacts. If dust is observed above the action level (3.0 mg/m³) and it is believed to originate from off-site (i.e., upwind) sources, this will immediately be reported to the MDE-VCP project team, as well as the MDE Air and Radiation Management Administration (ARMA).

5.2. WATER MANAGEMENT

This plan presents the protocols for handling any groundwater or surface water that needs to be removed to facilitate construction of the proposed Sub-Parcel A11-1 development.

5.2.1. Groundwater PAL Exceedances

A total of 23 shallow groundwater wells and temporary groundwater sample collection points (shown on **Figure 6**) were sampled within and surrounding the development LOD during the Parcel A11 Phase II Investigation as well as supplemental sampling activities. Aqueous PAL exceedances in shallow groundwater in the vicinity of the development LOD included both inorganic and organic compounds, including several elevated detections of VOCs and SVOCs. The aqueous PAL exceedances from the shallow hydrogeologic zone that are relevant for this RADWP are provided in the detection summary tables (**Table 3** and **Table 4**). While the concentrations of PAL exceedances are not deemed to be a significant human health hazard since there is no on-site groundwater use, proper water management is required to prevent unacceptable discharges or risks to on-site workers.

5.2.2. Dewatering

Dewatering may be necessary during the installation of underground utilities (within trenches/excavations). If dewatering is required, it shall be done in accordance with all local, state, and federal regulations.

Water that collects in excavations/trenches due to intrusion of groundwater, stormwater, and/or dust control waters will be transported to the Humphrey Creek Waste Water Treatment Plant (HCWWTP). The water will be treated and discharged in accordance with NPDES Permit No. 90-DP-0064A; I. Special Conditions; A.4; Effluent Limitations and Monitoring Requirements. The water will be trucked directly to the HCWWTP.

The EP will inspect any water that collects in the excavations/trenches. If the water exhibits indications of significant contamination (sheen, odor, discoloration, presence of product), or if the excavation/trench is within a known area of significant groundwater contamination (if groundwater is the source of the intrusive water) or a significant Phase II Investigation target, the water may be sampled and analyzed for some or all of the analyses listed below. The analyses run will be dependent on the suspected source of contamination and local site conditions. It is notable that the groundwater under some areas of the proposed development contains concentrations of VOCs and/or SVOCs which exceed the threshold levels for acceptable treatment at the HCWWTP (listed below). These areas are highlighted on **Figure 17** based on the summary of groundwater conditions presented in **Figure 10** and supporting analytical data presented in **Table 3**. Any dewatering that is completed within these defined areas will necessarily require analytical testing of the intrusive water, and at a minimum the water shall be analyzed for VOCs and SVOCs.

The results of the analyses will be reviewed by the HCWWTP operator to determine if any wastewater treatment system adjustments are necessary. If the results of the analyses are above the threshold levels listed below, the water will be further evaluated to confirm acceptable treatment at the HCWWTP, or will be evaluated to design an appropriate pre-treatment option. Alternatively, the water may be disposed of at an appropriate off-site facility.

<u>Analysis</u>	<u>Threshold Levels</u>
• <u>Total metals by USEPA Method 6020A</u>	<u>1,000 ppm</u>
• <u>PCBs by USEPA Method 8082</u>	<u>>Non-Detect</u>
• <u>SVOCs by USEPA Method 8270C</u>	<u>1 ppm</u>
• <u>VOCs by USEPA Method 8260B</u>	<u>1 ppm</u>
• <u>Oil & Grease by USEPA Method 1664</u>	<u>200 ppm</u>

Documentation of any water testing, as well as the selected disposal option, will be reported to the MDE in the Development Completion Report. Any permits or permit modifications related to dewatering will be provided to the agencies as addenda to this RADWP.

5.3. HEALTH AND SAFETY

Since the project is expected to encounter soil that is impacted with elevated levels of COPCs, in particular elevated VOCs/SVOCs and NAPL, all of the required intrusive construction work or activities which require the handling of potentially impacted materials will be performed by OSHA

HAZWOPER trained workers. The use of OSHA HAZWOPER trained workers will mitigate potential risks to Construction Workers by ensuring that the on-site work is performed by personnel who are trained and equipped for the conditions at the Site.

The contractor providing the OSHA HAZWOPER trained workers will develop a site-specific HASP which will be applied to all on-site workers who may be engaged in the above-referenced activities. The HASP will specify workspace monitoring, Action Levels, and the appropriate Personal Protection Equipment (PPE) for worker health and safety protection for the project. A Site Safety Officer must be designated within the contractor's HASP. A copy of the HASP will be maintained on-site and will be made available to the EP. The EP will be responsible for monitoring organic vapor concentrations in the worker breathing zone within the trenches and will coordinate with the designated Site Safety Officer (provided by the contractor) to determine whether any increased level of health and safety protection (including engineering controls and/or PPE) is required. The designated Site Safety Officer will be responsible for ensuring compliance with the requirements of the HASP, and for enforcing these requirements.

Prior to commencing work, the contractor must conduct an on-site safety meeting for all personnel. All personnel must be made aware of the HASP. Detailed safety information shall be provided to personnel who may be exposed to COPCs. Workers will be responsible for following safety procedures to prevent contact with potentially contaminated material. The EP may elect to adopt the contractor's HASP, or can prepare their own site-specific HASP.

OSHA HAZWOPER trained workers will not be required during construction activities which do not have a significant exposure risk, such as above-grade building construction.

5.4. INSTITUTIONAL CONTROLS (FUTURE LAND USE CONTROLS)

Long-term conditions related to future use of the Site will be placed on the RADWP approval, No Further Action Letter (NFA), and Certificate of Completion (COC). These conditions are anticipated to include the following:

- A restriction prohibiting the use of groundwater for any purpose at the Site and a requirement to characterize, containerize, and properly dispose of groundwater in the event of deep excavations encountering groundwater. The entire Tradepoint Atlantic property will be subject to the groundwater use restriction.
- Notice to MDE prior to any future soil disturbance activities at the Site. This written notice will be required at least 30 days prior to any planned excavation activities.
- Requirement for a HASP for any future excavations at the Site.
- Complete appropriate characterization and disposal of any future material excavated at the Site in accordance with applicable local, state and federal requirements.
- Implementation of inspection procedures and maintenance of the containment remedies.

The responsible party will file the above deed restrictions as defined by the MDE-VCP in the NFA and COC. The Tenant will be required to sign onto the Environmental Covenant with restriction in the NFA. Tradepoint Atlantic will notify the Tenant of this requirement and will provide MDE with contact information for the Tenant prior to issuance of the NFA.

5.5. POST REMEDIATION REQUIREMENTS

Post remediation requirements will include compliance with the conditions specified in the NFA, COC, and the deed restrictions recorded for the Site. Deed restrictions will be recorded within 30 days after receipt of the final NFA. In addition, the MDE will be provided with a written notice at least 30 days prior to any planned excavation activities at the Site. Written notice of planned excavation activities will include the proposed date(s) for the excavation, location of the excavation, health and safety protocols (as required), clean fill source (as required), and proposed characterization and disposal requirements.

Long-term groundwater monitoring requirements for the entire Parcel A11 site have not yet been determined. A document presenting the findings of the on-going groundwater delineation response actions will be provided to the agencies. This document will propose a long-term groundwater monitoring approach for the groundwater impacts associated with Parcel A11 (which may include areas within Sub-Parcel A11-1 or another boundary as appropriate).

Additional requirements will include inspection procedures and maintenance of the containment remedies to minimize degradation which could lead to future exposures. An Operations and Maintenance Plan (O&M Plan) for the Site will be submitted in the future for MDE approval. This O&M Plan will include long-term inspection and maintenance requirements for the capped areas of the Site as well as the vapor barrier.

The O&M Plan will also include details regarding future monitoring of indoor air and sub-slab vapor below the warehouse. A plan that includes details about the locations and sampling methods for indoor air sampling will be submitted to the agencies within the O&M Plan for review once the internal building design is complete and prior to building occupancy to demonstrate that the vapor barrier is an effective remedy. This O&M Plan will also include a detailed future monitoring program to ensure sub-slab vapor and indoor air are monitored periodically if the venting system remains passive. The monitoring frequency for sub-slab vapor and/or indoor air may be reduced over time depending on the analytical results (to be specified in the O&M Plan). The proposed sub-slab vapor sampling locations are shown on **Figure 13a/b**. In addition, one or more of the sub-slab PVC vapor mitigation system cleanouts shown on **Figure 13a/b** (detailed in **Figure 15**) may be used for further sampling. Minor adjustments to the locations of the vapor monitoring points and/or cleanouts may be necessary during, or prior to, construction based on the final interior layout of the building.

The responsible party will perform cap/barrier inspections, perform maintenance of the cap/barrier, retain inspection records, and perform indoor air and/or sub-slab vapor sampling as required by the O&M Plan.

5.6. CONSTRUCTION OVERSIGHT

Construction Oversight by an EP will ensure and document that the project is built as designed and appropriate environmental and safety protocols are followed. Upon completion, the EP will certify that the project is constructed in accordance with this RADWP.

The EP will monitor all soil excavation and utility trenching activities for signs of potential contamination that may not have been previously identified. In particular, soils will be monitored with a hand-held PID for potential VOCs, and will also be visually inspected for the presence of staining, petroleum waste materials, or other indications of significant contamination. If screening of excavated materials by the EP indicates the presence of conditions of potential concern (i.e., sustained PID readings greater than 10 ppm, visual staining, unsuitable waste materials, etc.), such materials shall be segregated for additional sampling and special management (as described in Section 5.1.2; Soil Excavation and Utility Trenching). The EP will also inspect any water that collects in the excavations/trenches on an as-needed basis to coordinate appropriate sampling prior to disposal (as described in Section 5.2.2; Dewatering).

Daily inspections, as necessary, will be performed during general site grading and cap construction activities to verify that the Stego® Wrap vapor barrier is installed in accordance with the manufacturers specifications and any seams or surface penetrations are sealed properly (as described in Section 4.2.5; Sub-slab Vapor Barrier with Passive/Active Venting System), appropriate fill materials are being used (as described in Section 5.1.4; Fill), geotechnical testing and field verification is performed as required for any clay liners (as described in Section 5.1.5; Clay Liner Installation), dust control measures are being implemented as appropriate (as described in Section 5.1.6; Dust Control), and surface engineering controls are being installed with the appropriate minimum thicknesses (as shown on the RADWP attachments). Oversight by an EP will not be required during construction activities which do not have a significant environmental component, such as above-grade building construction.

Records shall be provided by the EP to document:

- Compliance with soil screening requirements
- Proper water management, including documentation of any testing and water disposal
- Compliance with geotechnical testing requirements and field verification for stormwater pond clay liners (if applicable)
- Observations of construction activities during site grading and cap construction
- Proper construction of sub-slab vapor barrier with passive/active venting system
- Proper cap thickness and construction

6.0 PERMITS, NOTIFICATIONS AND CONTINGENCIES

The participant and their contractors will comply with all local, state, and federal laws and regulations by obtaining any necessary approvals and permits to conduct the activities contained herein. Any permits or permit modifications from State or local authorities will be provided as addenda to this RADWP.

A grading permit is required if the proposed grading disturbs over 5,000 square feet of surface area or over 100 cubic yards of earth. A grading permit is required for any grading activities in any watercourse, floodplain, wetland area, buffers (stream and within 100 feet of tidal water), habitat protection areas or forest buffer areas (includes forest conservation areas). Erosion and Sediment Control Plans will be submitted to, and approved by, the MDE prior to initiation of land disturbance for development.

There are no wetlands identified within the project area and no work will be performed beyond the shoreline so no permits are required from the MDE Water Resources Administration.

Contingency measures will include the following:

1. The MDE will be notified immediately of any previously undiscovered contamination, previously undiscovered storage tanks and other oil-related issues, and citations from regulatory entities related to health and safety practices.
2. Any significant change to the implementation schedule will be noted in the progress reports to MDE.

7.0 IMPLEMENTATION SCHEDULE

Progress reports will be submitted to the MDE on a quarterly basis. Each quarterly progress report will include, at a minimum, a discussion of the following information regarding tasks completed during the specified quarter:

- Development Progress
- Dust Monitoring
- Water Management
- Soil Management (imported materials, screening, stockpiling)
- Soil Sampling and Disposal
- Notable Occurrences (if applicable)
- Additional Associated Work (if applicable)

The proposed implementation schedule is shown below:

<u>Task</u>	<u>Proposed Completion Date</u>
Anticipated Plan Approval	October 15, 2018 (conditional) June 14, 2019 (final)
<u>Response Phase</u>	
Groundwater Network Abandonment	November 2018
Monitoring Well Installation	December 2018
<u>Development Phase</u>	
Installation of Erosion and Sediment Controls	April 2019 (start)
Slag (or Alternative Fill) Delivery and Placement	April 2019 (start)
Site Preparation/Grading – Building Pad & Parking	April 2019 (start)
Installation of Underground Utilities	May 2019 (start)
Domestic Fire & Water Loop (4 weeks)	
Sanitary Lines (2 weeks)	
Stormwater (6 weeks)	
Pond Excavation and Grading (4 weeks)	

Installation of Building	May 2019 (start)
Installation of Pavements	August 2019
Submittal of Development Completion Report/ Notice of Completion of Remedial Actions*	January 2020
Request for a NFA from the MDE	February 2020
Recordation of institutional controls in the land records office of Baltimore County	Within 30 days of receiving the approval of NFA from the MDE
Submit proof of recordation with Baltimore County	Upon receipt from Baltimore County

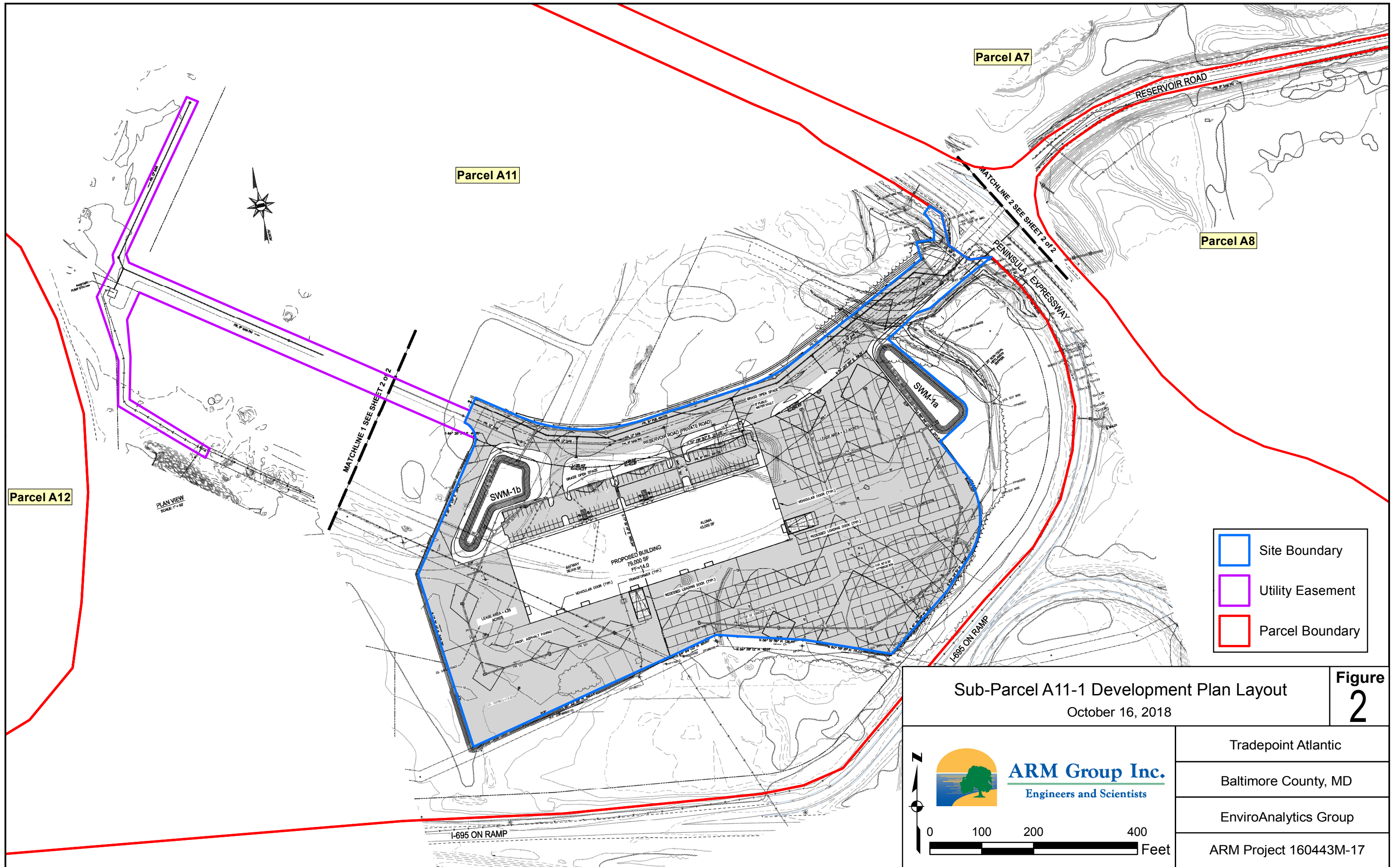
*Notice of Completion of Remedial Actions shall be prepared by Professional Engineer registered in Maryland and submitted with the Development Completion Report to certify that the work is consistent with the requirements of this RADWP and the Site is suitable for occupancy and use.

FIGURES



Site Boundary
 Parcel Boundaries
 Sub-Parcel A11-1 Boundary
 Private Property

Tradepoint Atlantic Area A and Area B Parcels October 24, 2018		Figure 1
 	 ARM Group Inc. Engineers and Scientists	Tradepoint Atlantic Baltimore County, MD EnviroAnalytics Group
	Area A: Project 150298M Area B: Project 150300M Development: Project 160443M	

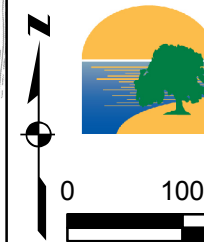


- Site Boundary
- Utility Easement
- Parcel Boundary

Sub-Parcel A11-1 Development Plan Layout

October 16, 2018

Figure
2



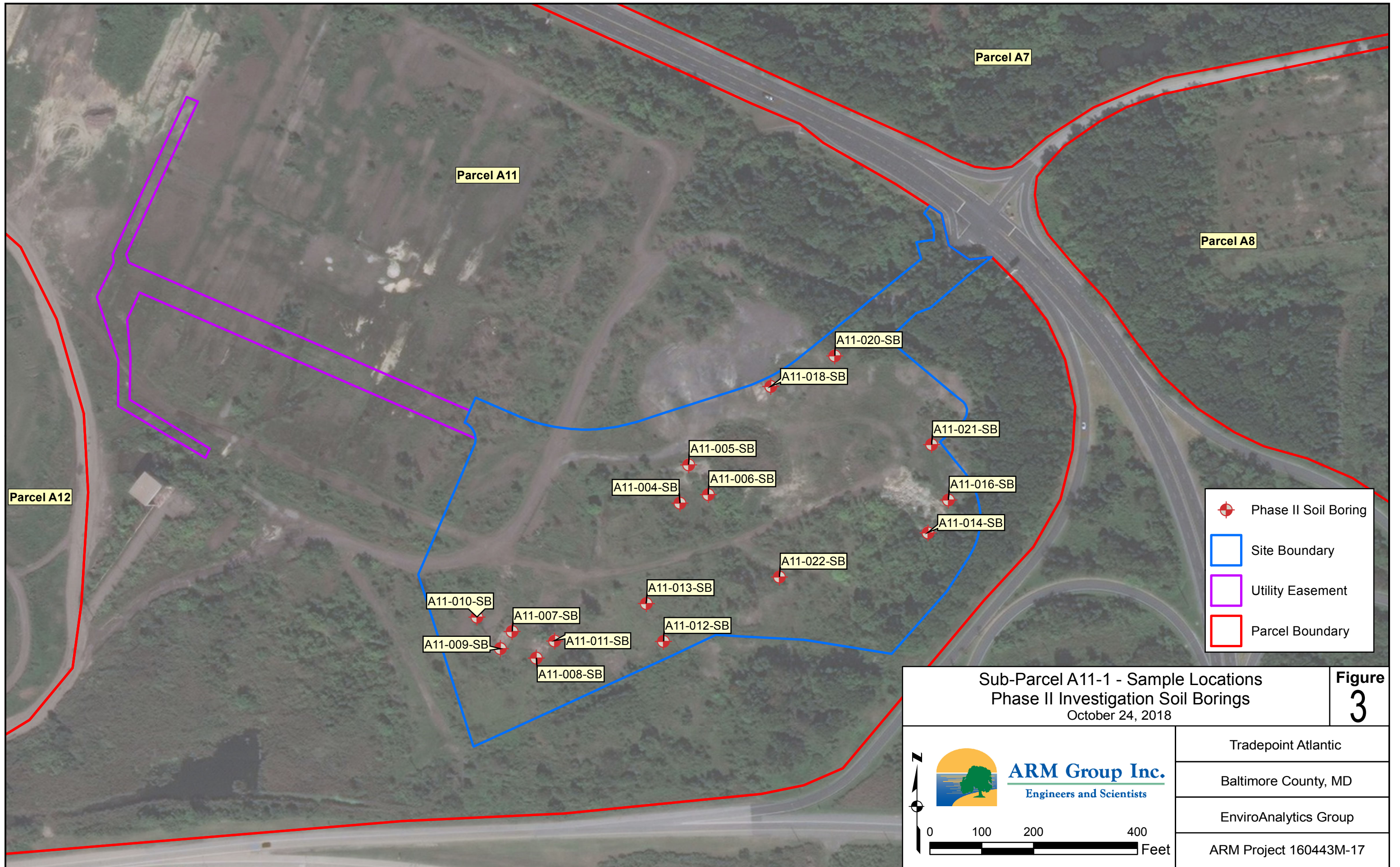
ARM Group Inc.
Engineers and Scientists





Tradeport Atlantic


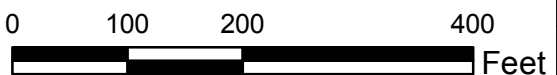

Baltimore County, MD

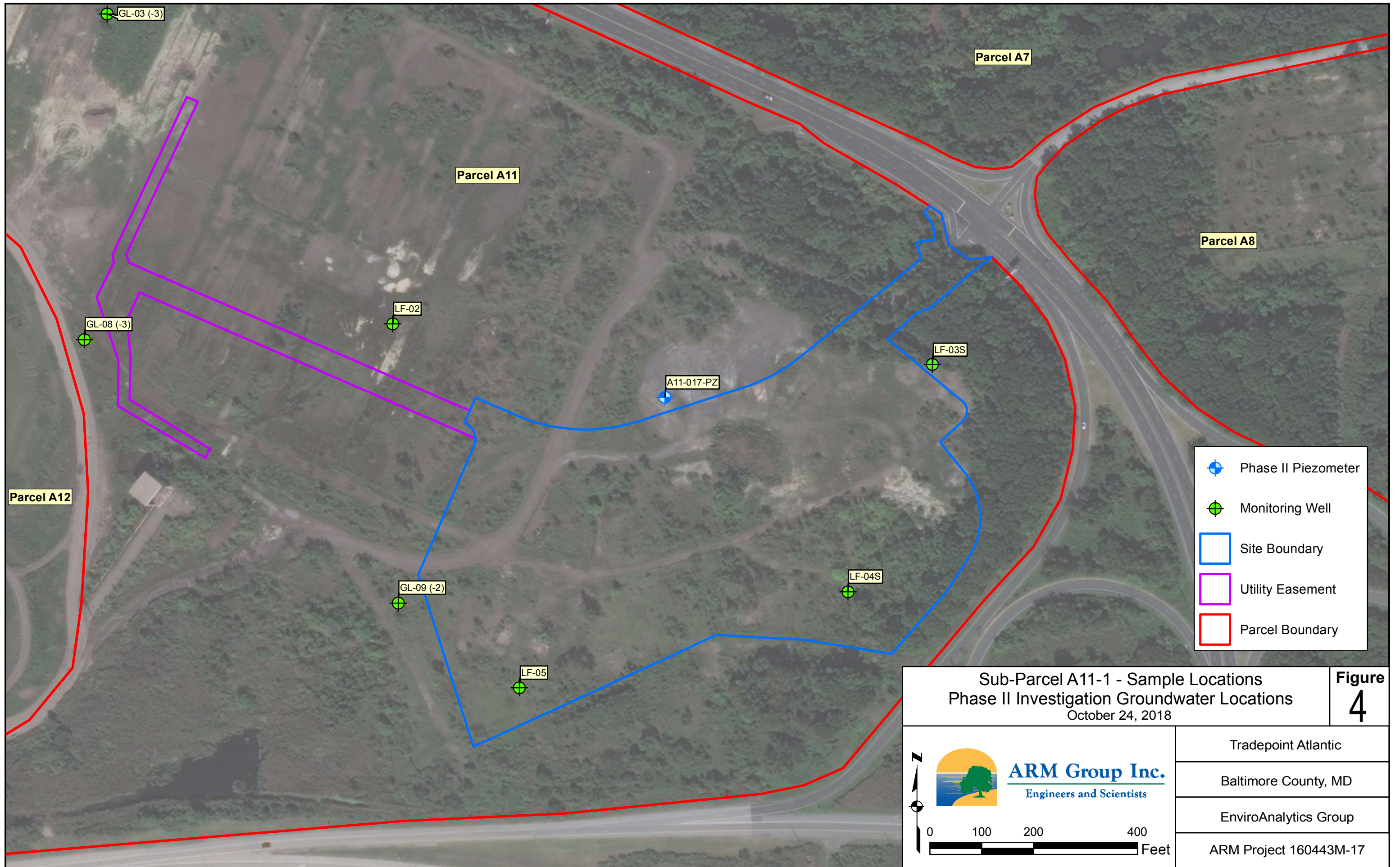
EnviroAnalytics Group






ARM Project 160443M-17



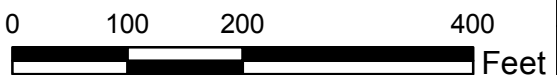


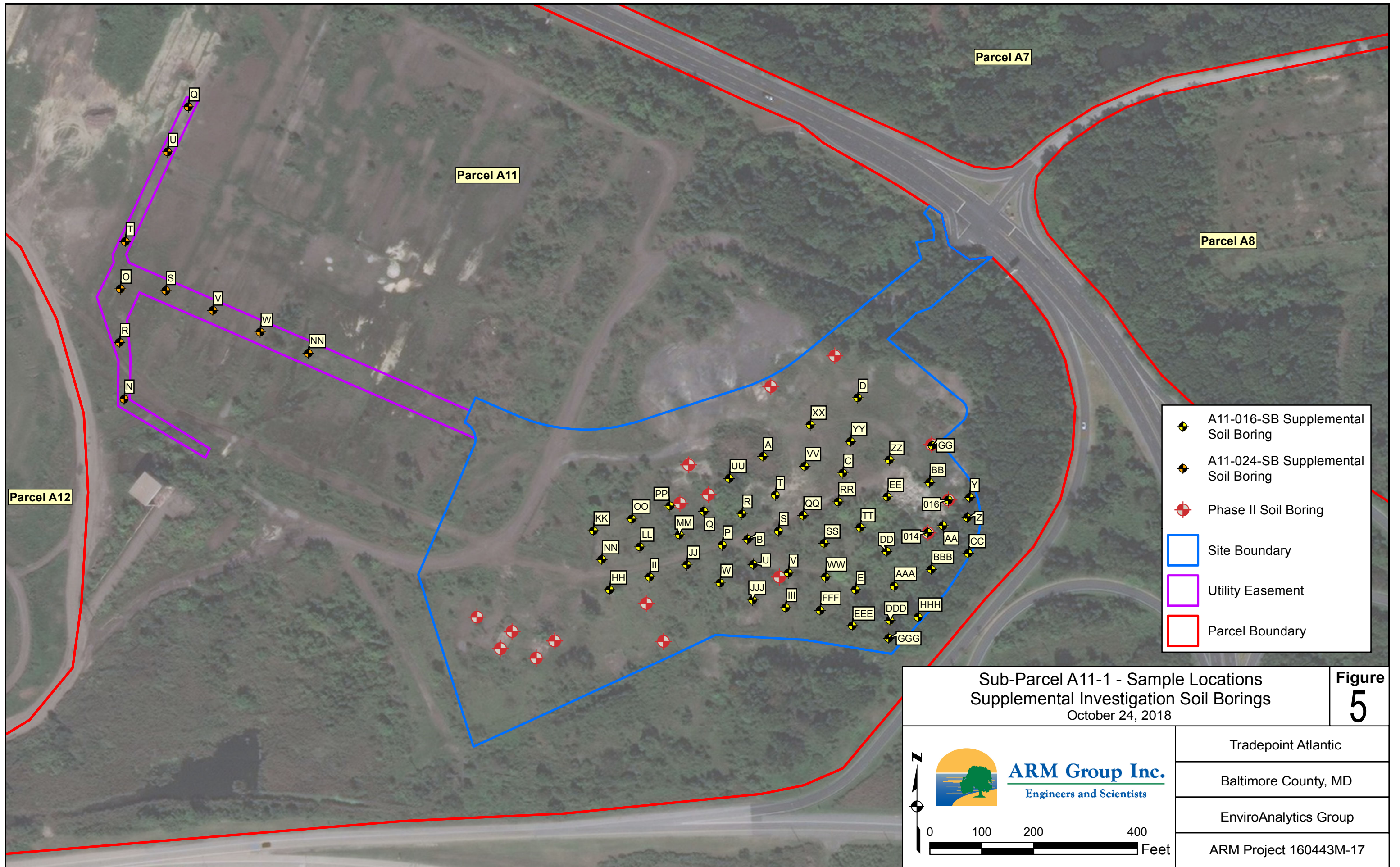
-  Phase II Soil Boring
-  Site Boundary
-  Utility Easement
-  Parcel Boundary







Sub-Parcel A11-1 - Sample Locations Phase II Investigation Soil Borings October 24, 2018		Figure 3
 	 ARM Group Inc. Engineers and Scientists	
	Tradepoint Atlantic	
	Baltimore County, MD	
	EnviroAnalytics Group	
ARM Project 160443M-17		





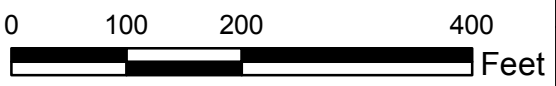
-  Phase II Piezometer
-  Monitoring Well
-  Site Boundary
-  Utility Easement
-  Parcel Boundary

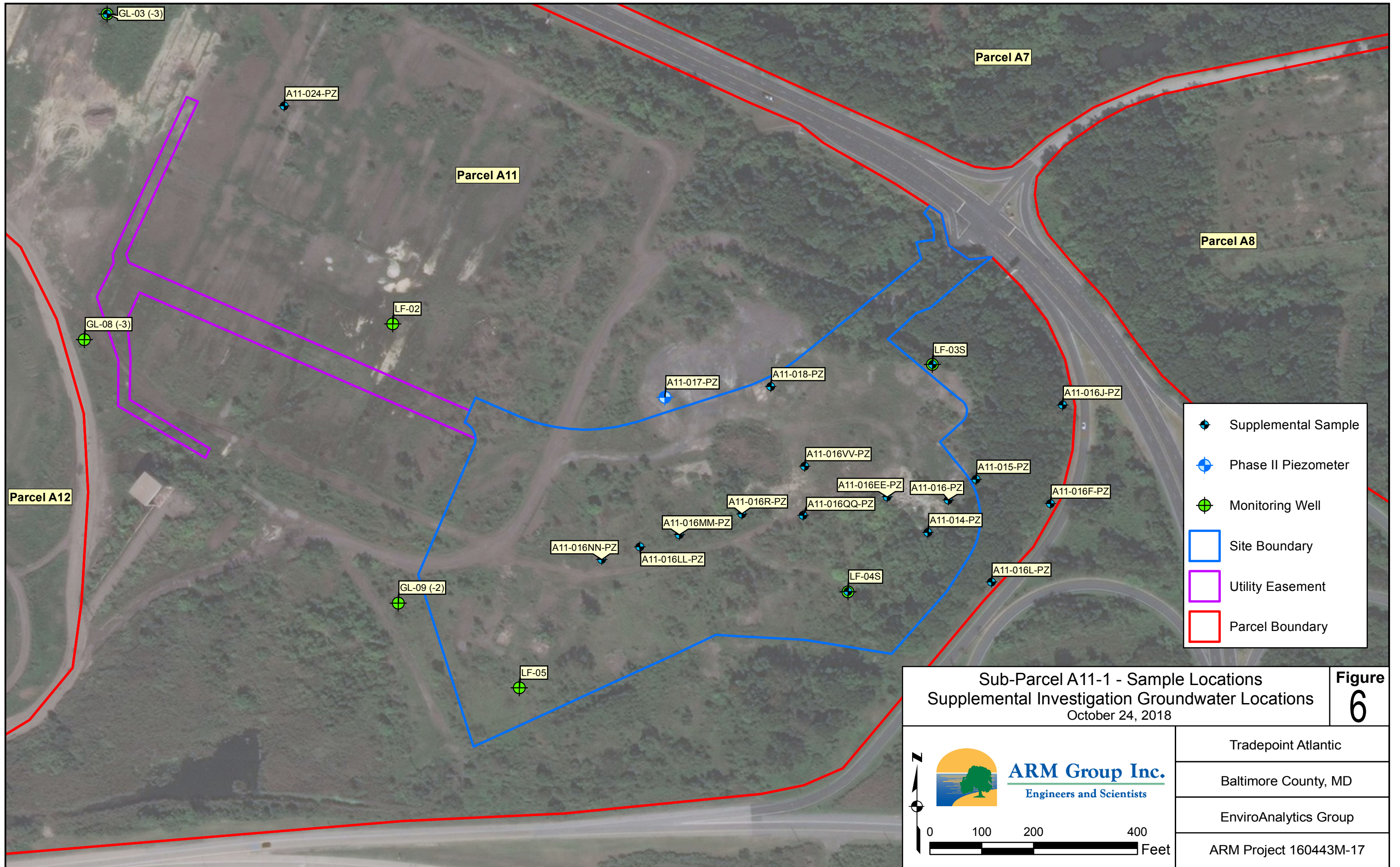
Sub-Parcel A11-1 - Sample Locations Phase II Investigation Groundwater Locations October 24, 2018		Figure 4
 ARM Group Inc. Engineers and Scientists		Tradepoint Atlantic
 		Baltimore County, MD
		EnviroAnalytics Group
		ARM Project 160443M-17



-  A11-016-SB Supplemental Soil Boring
-  A11-024-SB Supplemental Soil Boring
-  Phase II Soil Boring
-  Site Boundary
-  Utility Easement
-  Parcel Boundary


Sub-Parcel A11-1 - Sample Locations Supplemental Investigation Soil Borings October 24, 2018		Figure 5
  ARM Group Inc. Engineers and Scientists	Tradepoint Atlantic	
	Baltimore County, MD	
	EnviroAnalytics Group	
	ARM Project 160443M-17	

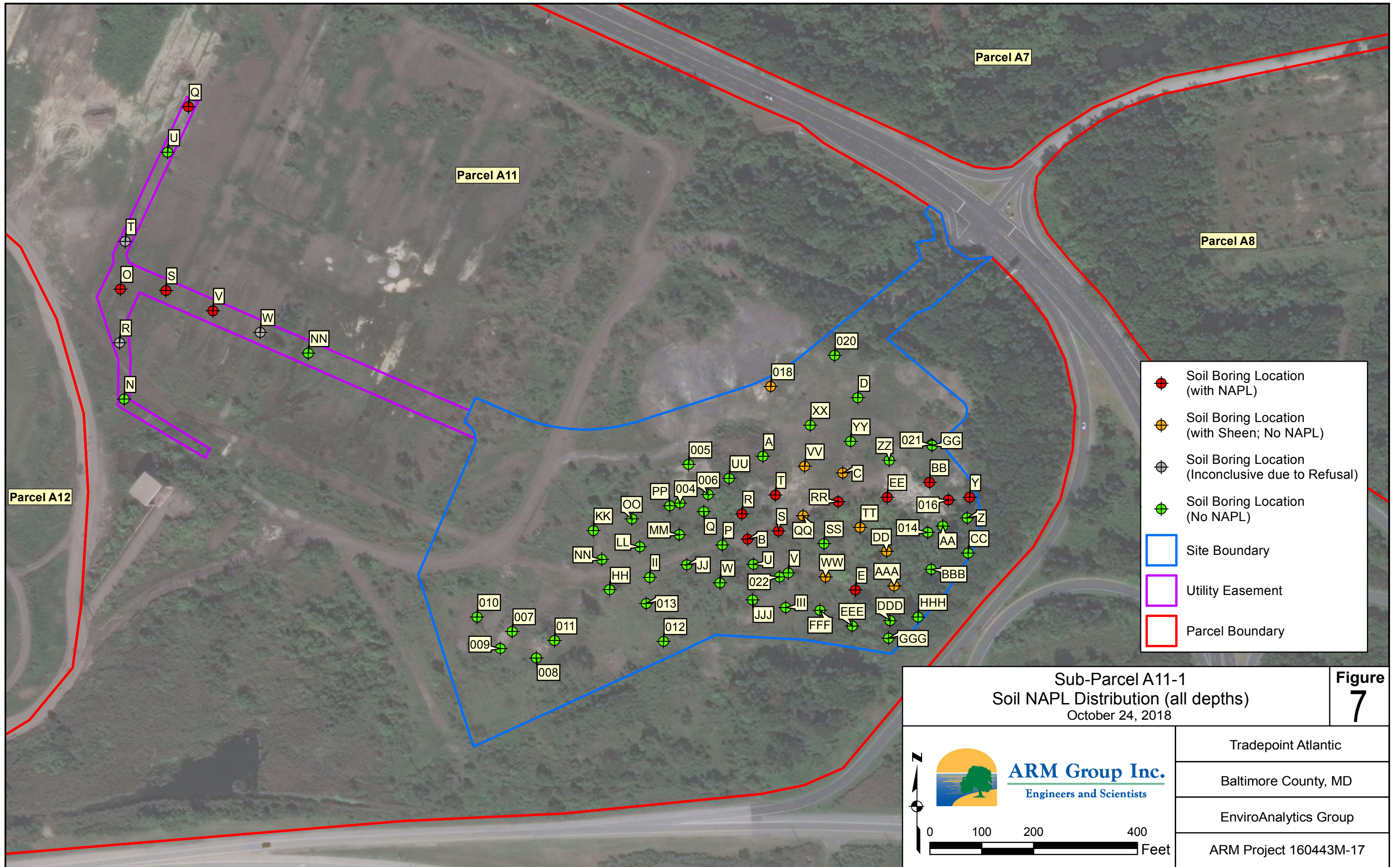




Sub-Parcel A11-1 - Sample Locations
 Supplemental Investigation Groundwater Locations
 October 24, 2018

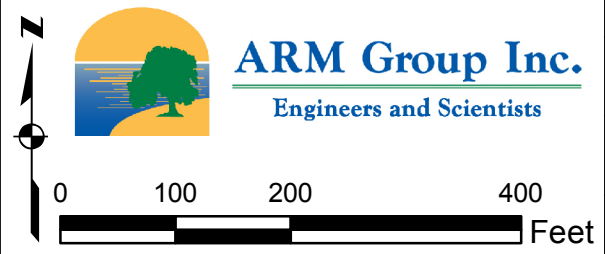
Figure
 6

 <p>ARM Group Inc. Engineers and Scientists</p>	Tradepoint Atlantic
	Baltimore County, MD
	EnviroAnalytics Group
	ARM Project 160443M-17



- Soil Boring Location (with NAPL)
- Soil Boring Location (with Sheen; No NAPL)
- Soil Boring Location (Inconclusive due to Refusal)
- Soil Boring Location (No NAPL)
- Site Boundary
- Utility Easement
- Parcel Boundary

Sub-Parcel A11-1 Soil NAPL Distribution (all depths) October 24, 2018		Figure 7
ARM Group Inc. Engineers and Scientists		
Tradepoint Atlantic Baltimore County, MD		
EnviroAnalytics Group ARM Project 160443M-17		



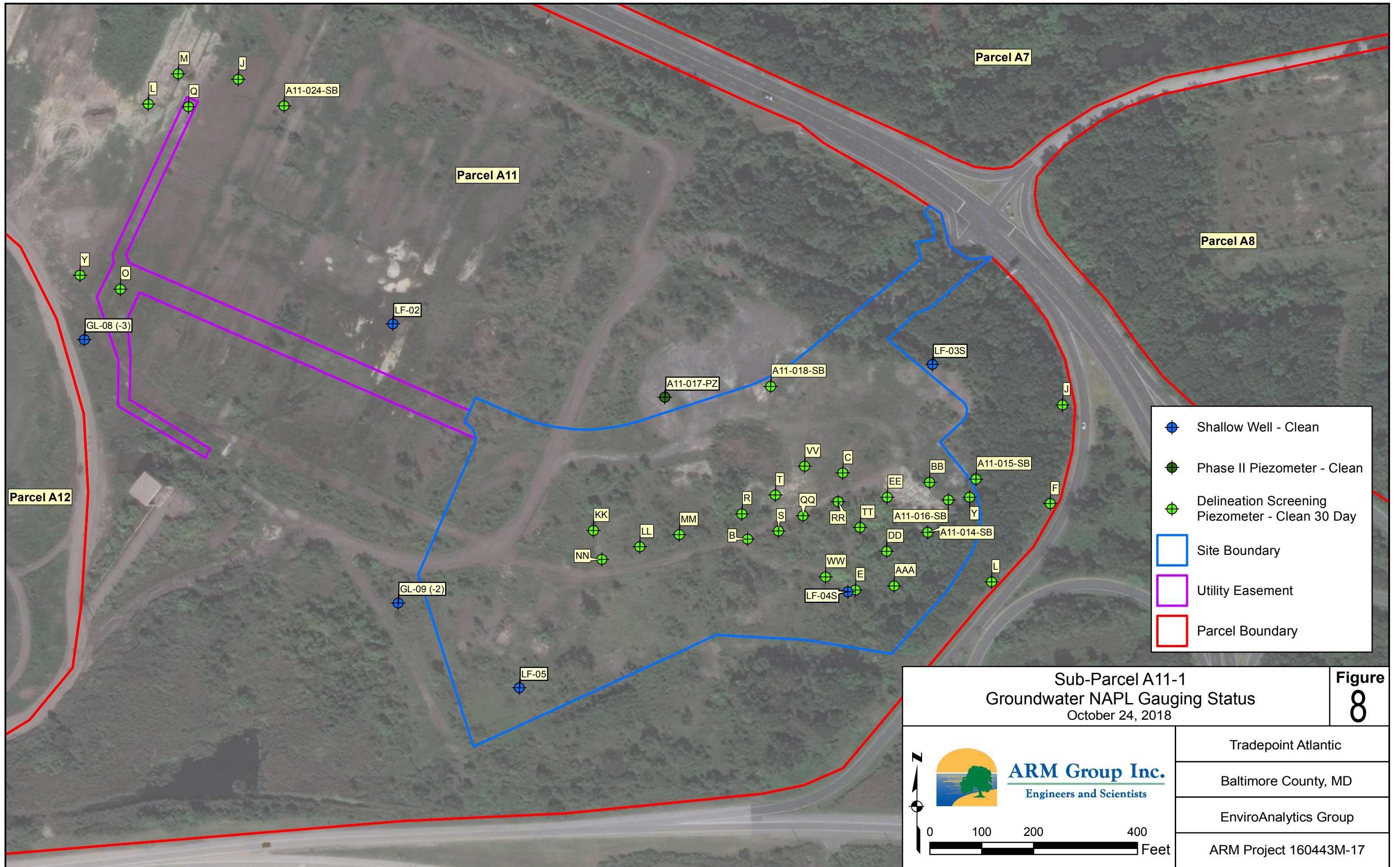
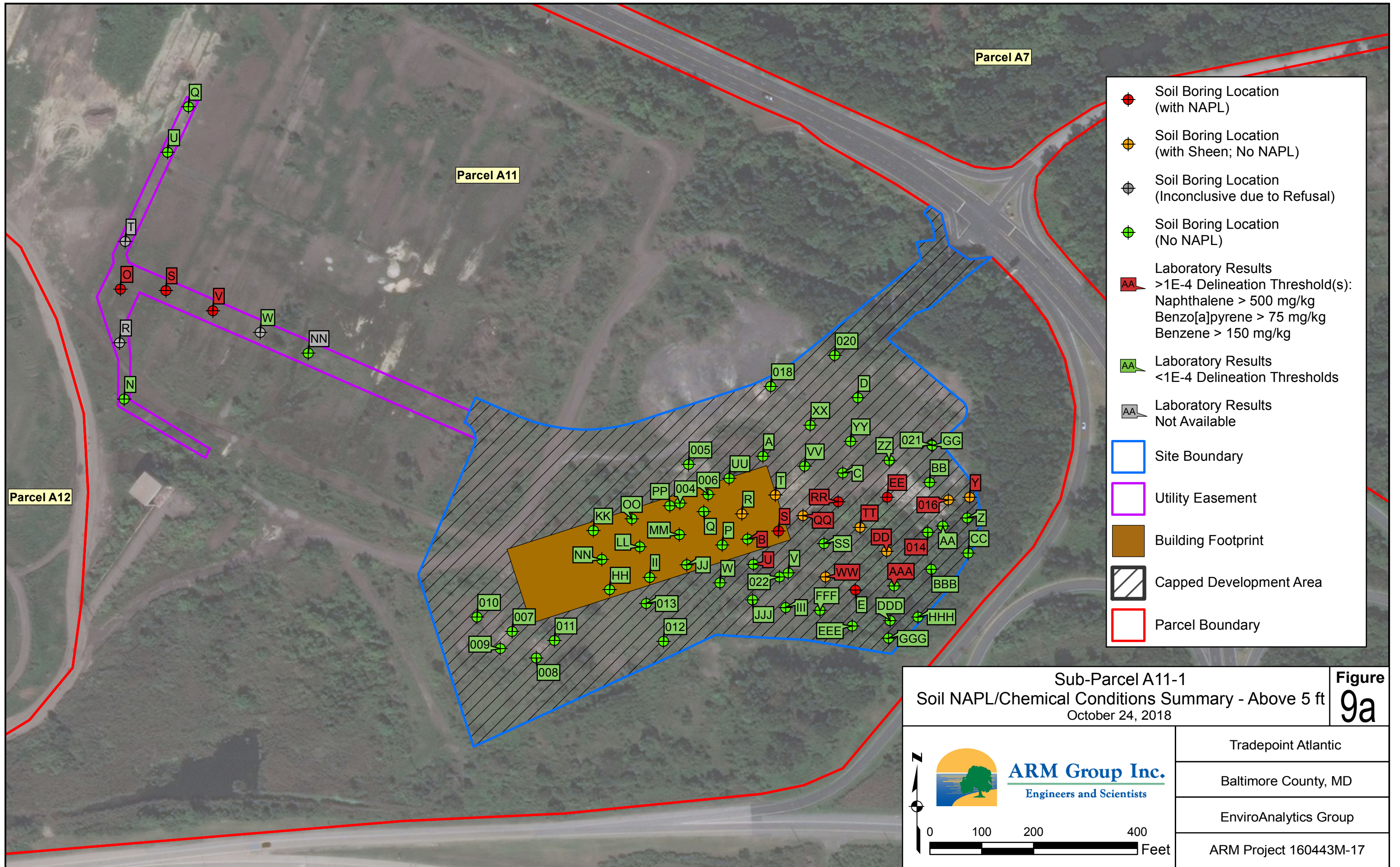















Figure 8




-  Soil Boring Location (with NAPL)
-  Soil Boring Location (with Sheen; No NAPL)
-  Soil Boring Location (Inconclusive due to Refusal)
-  Soil Boring Location (No NAPL)
-  Laboratory Results >1E-4 Delineation Threshold(s):
Naphthalene > 500 mg/kg
Benzo[a]pyrene > 75 mg/kg
Benzene > 150 mg/kg
-  Laboratory Results <1E-4 Delineation Thresholds
-  Laboratory Results Not Available
-  Site Boundary
-  Utility Easement
-  Building Footprint
-  Capped Development Area
-  Parcel Boundary

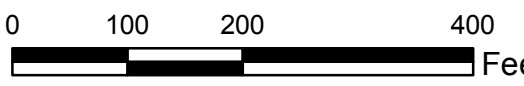
Sub-Parcel A11-1
Soil NAPL/Chemical Conditions Summary - Above 5 ft
October 24, 2018

Figure 9a

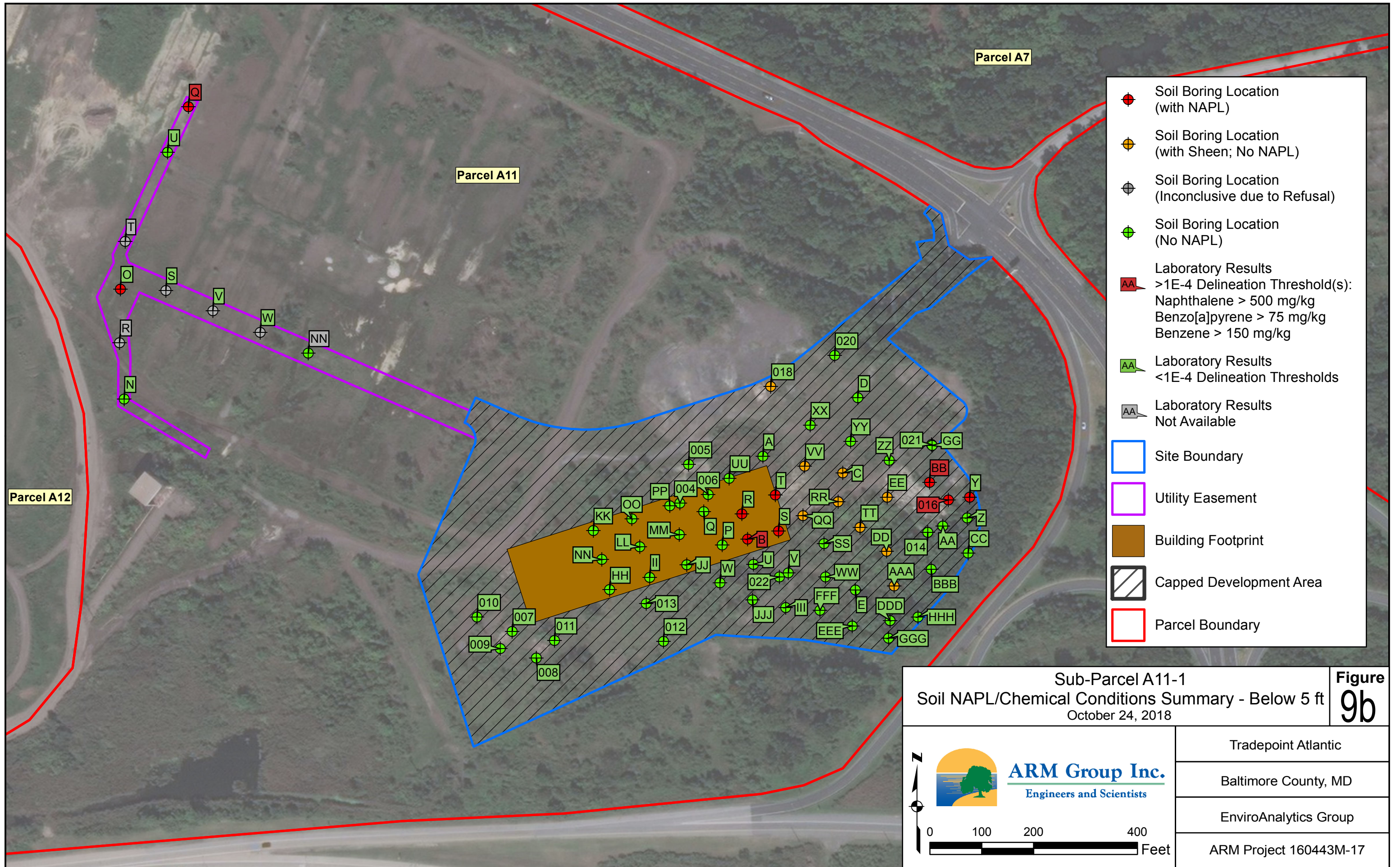
















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Engineers and Scientists




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Baltimore County, MD
EnviroAnalytics Group
ARM Project 160443M-17




-  Soil Boring Location (with NAPL)
-  Soil Boring Location (with Sheen; No NAPL)
-  Soil Boring Location (Inconclusive due to Refusal)
-  Soil Boring Location (No NAPL)
-  Laboratory Results >1E-4 Delineation Threshold(s):
Naphthalene > 500 mg/kg
Benzo[a]pyrene > 75 mg/kg
Benzene > 150 mg/kg
-  Laboratory Results <1E-4 Delineation Thresholds
-  Laboratory Results Not Available
-  Site Boundary
-  Utility Easement
-  Building Footprint
-  Capped Development Area
-  Parcel Boundary

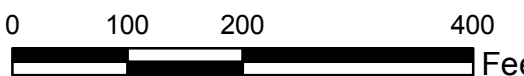
Sub-Parcel A11-1
Soil NAPL/Chemical Conditions Summary - Below 5 ft
October 24, 2018

Figure 9b

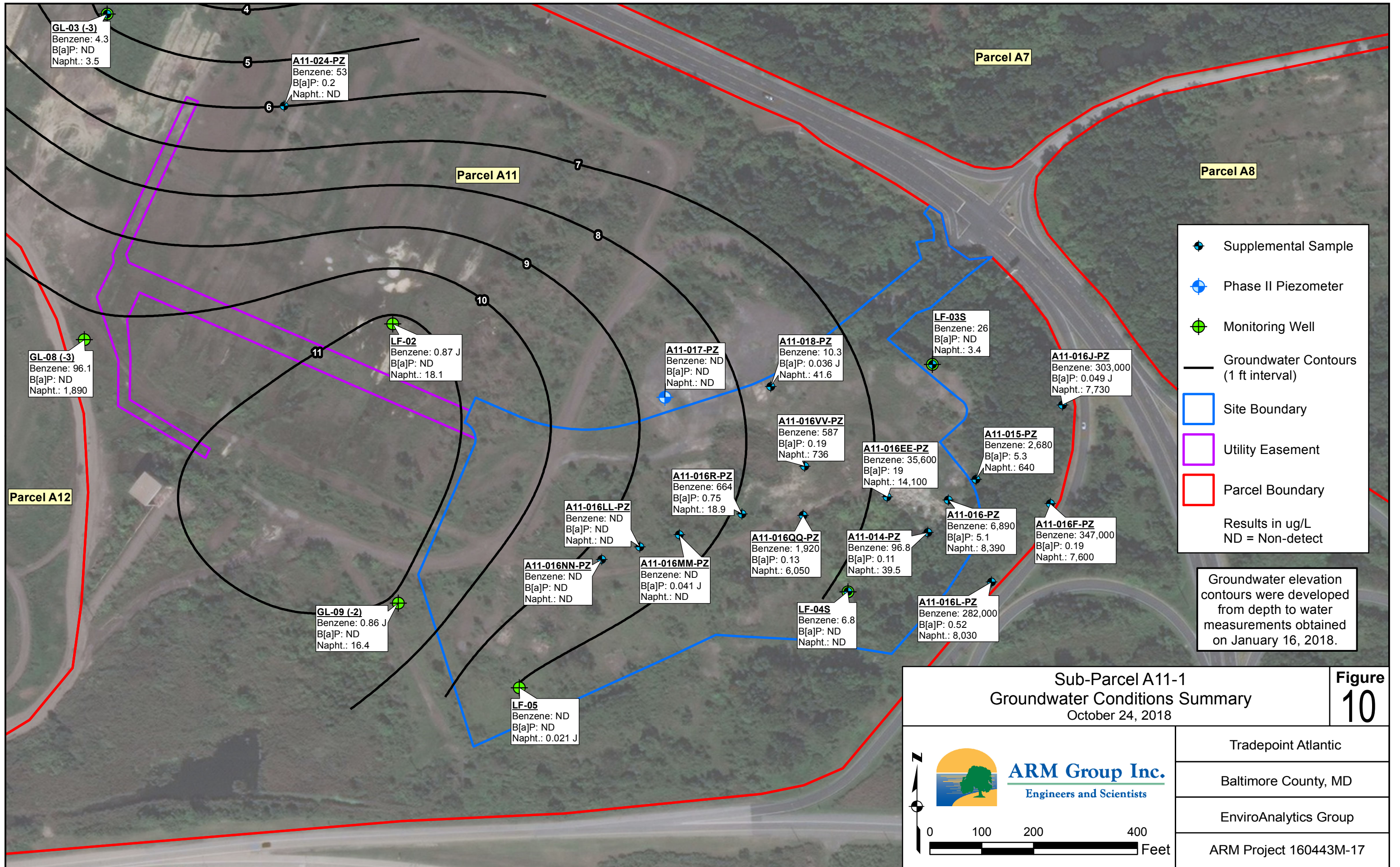


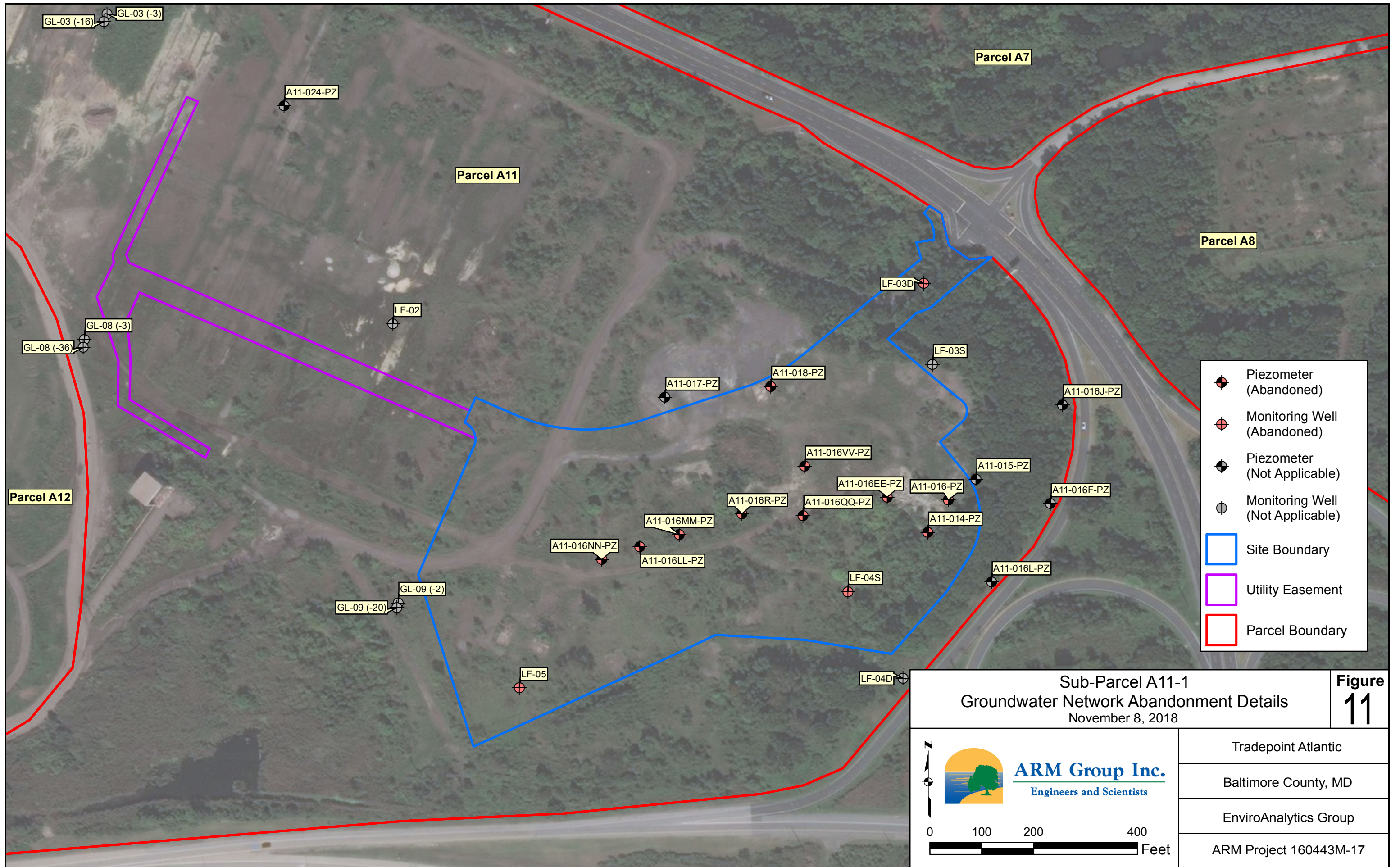


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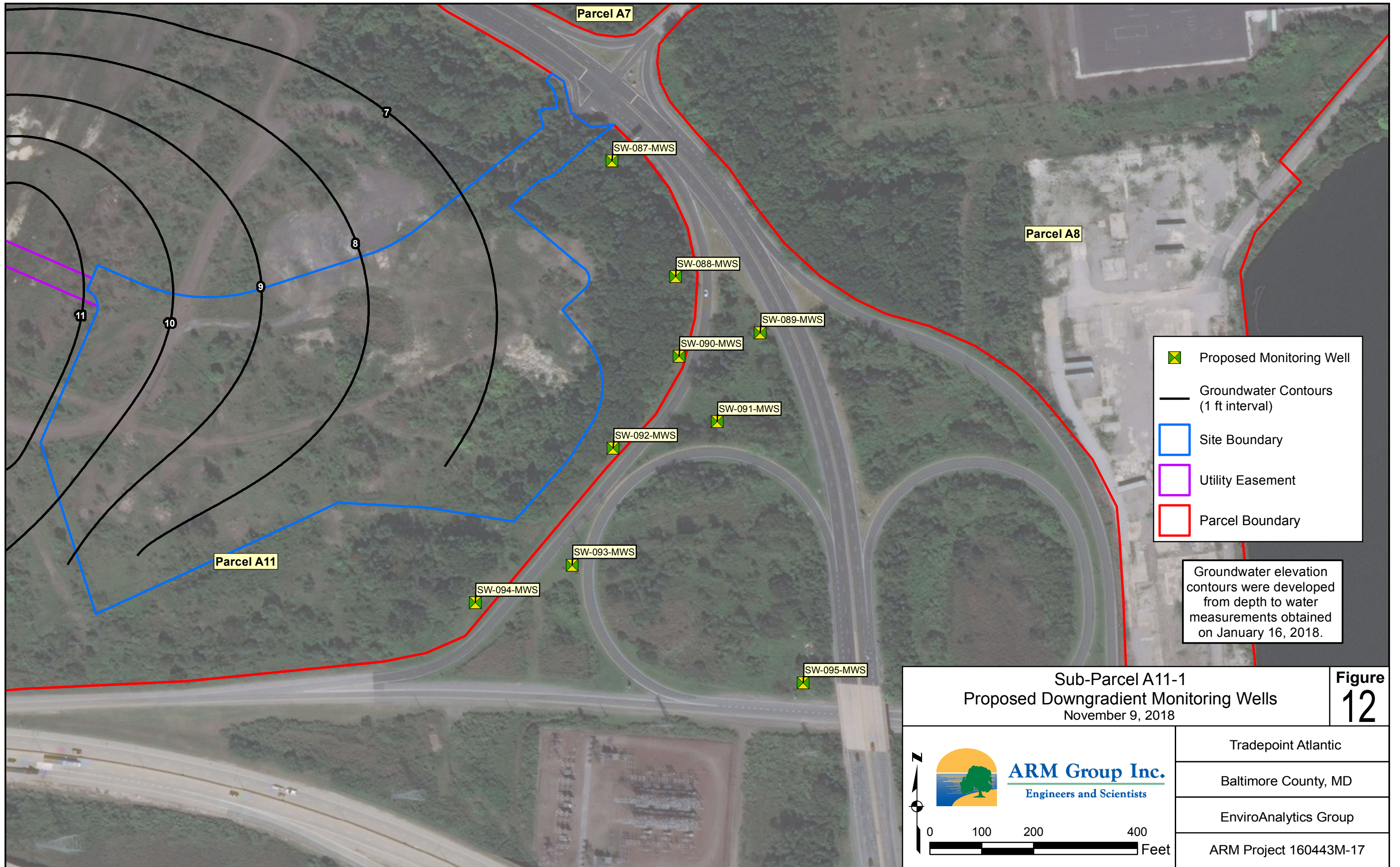
Sub-Parcel A11-1
 Groundwater Network Abandonment Details
 November 8, 2018


Figure
 11



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0 100 200 400
 Feet

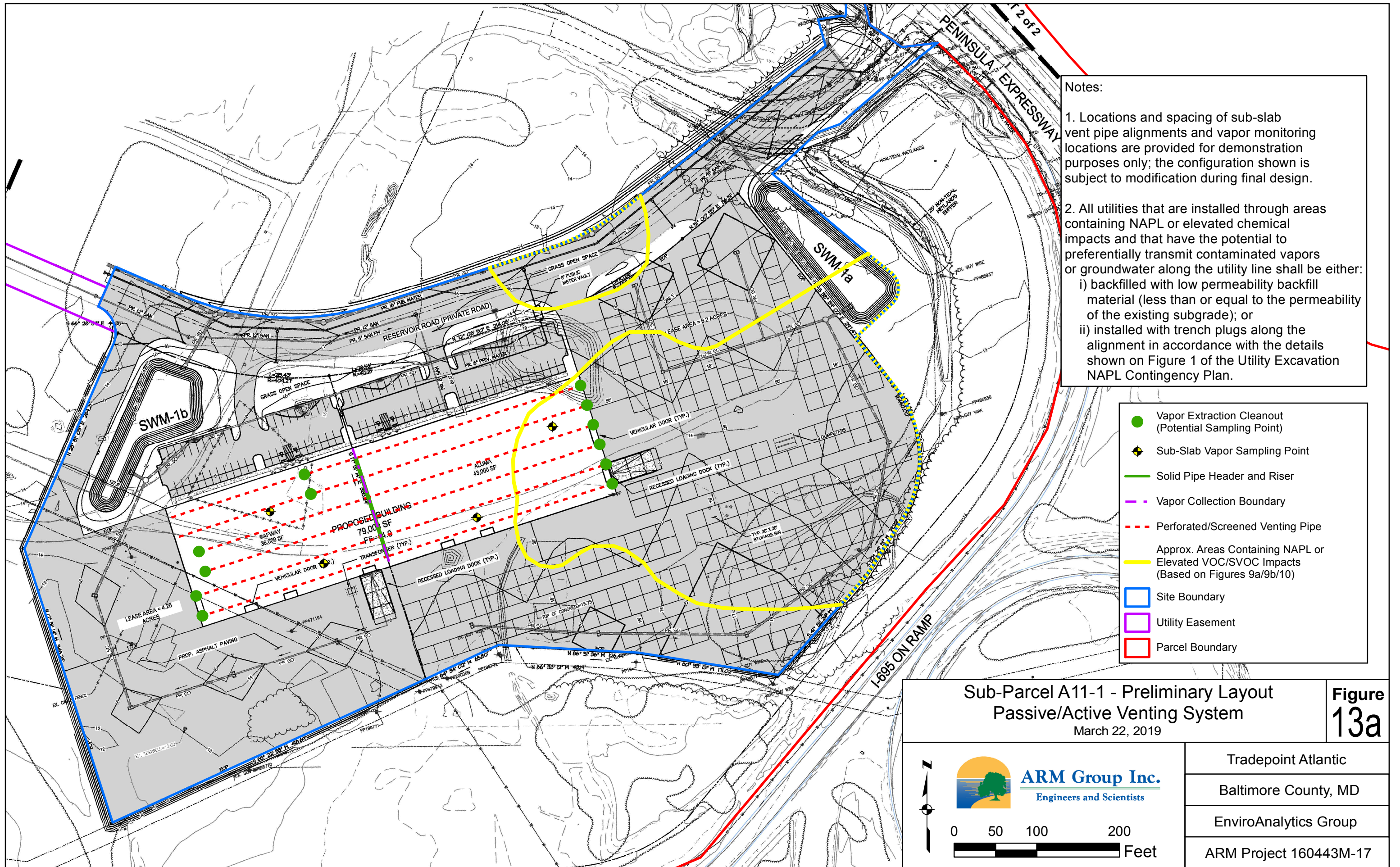
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-  Proposed Monitoring Well
- Groundwater Contours (1 ft interval)
- Site Boundary
- Utility Easement
- Parcel Boundary

Groundwater elevation contours were developed from depth to water measurements obtained on January 16, 2018.

Sub-Parcel A11-1 Proposed Downgradient Monitoring Wells November 9, 2018		Figure 12
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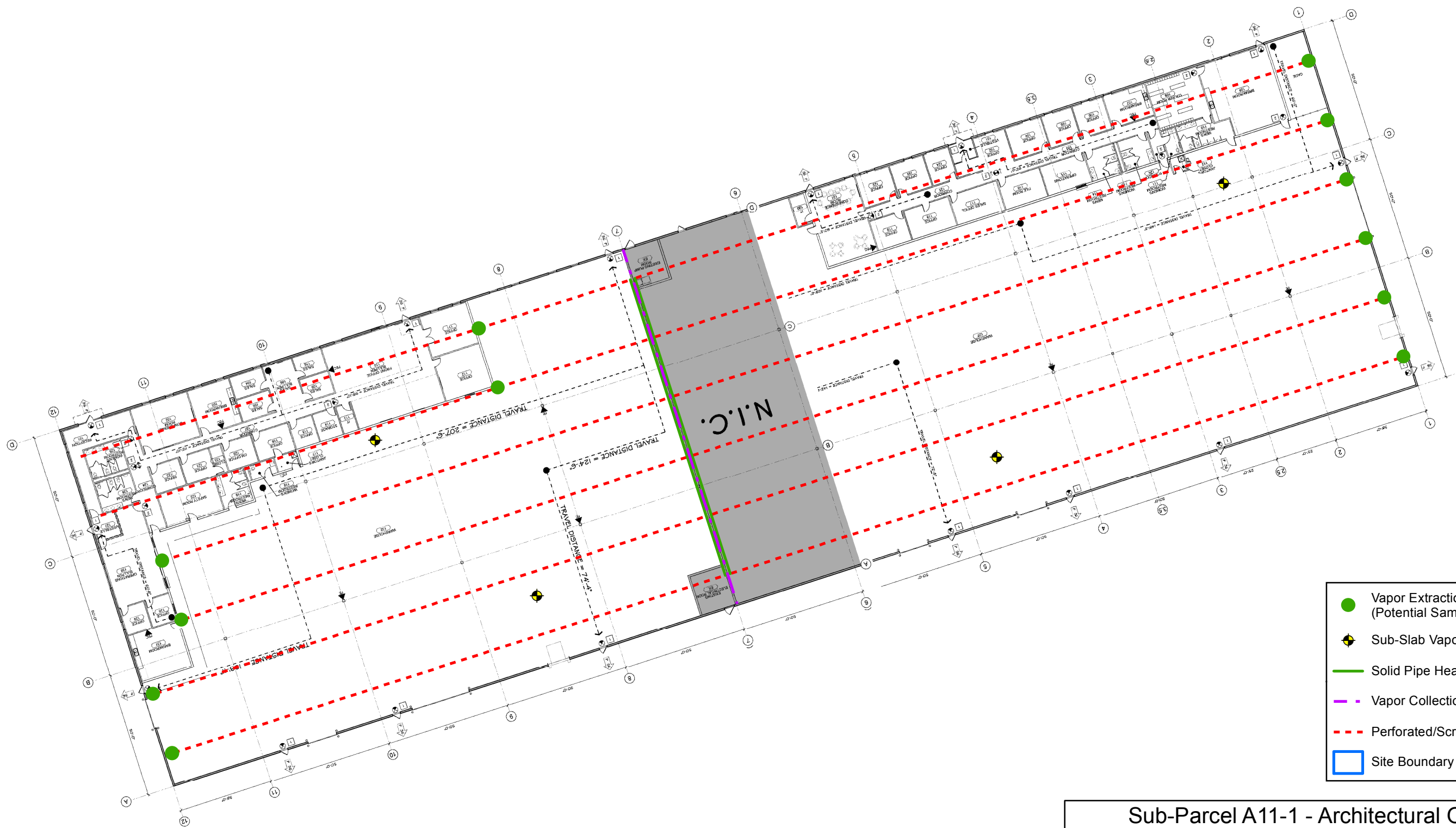


Notes:

1. Locations and spacing of sub-slab vent pipe alignments and vapor monitoring locations are provided for demonstration purposes only; the configuration shown is subject to modification during final design.
2. All utilities that are installed through areas containing NAPL or elevated chemical impacts and that have the potential to preferentially transmit contaminated vapors or groundwater along the utility line shall be either:
 - i) backfilled with low permeability backfill material (less than or equal to the permeability of the existing subgrade); or
 - ii) installed with trench plugs along the alignment in accordance with the details shown on Figure 1 of the Utility Excavation NAPL Contingency Plan.

- Vapor Extraction Cleanout (Potential Sampling Point)
- Sub-Slab Vapor Sampling Point
- Solid Pipe Header and Riser
- Vapor Collection Boundary
- - - Perforated/Screened Venting Pipe
- Approx. Areas Containing NAPL or Elevated VOC/SVOC Impacts (Based on Figures 9a/9b/10)
- Site Boundary
- Utility Easement
- Parcel Boundary

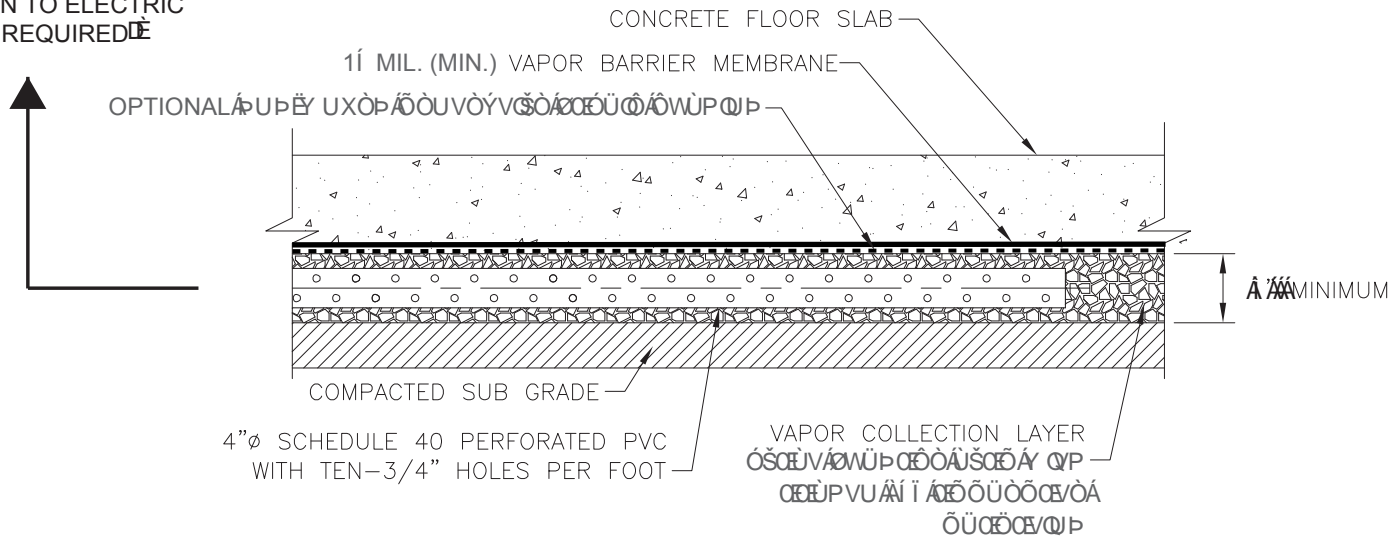
Sub-Parcel A11-1 - Preliminary Layout Passive/Active Venting System March 22, 2019		Figure 13a
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- Vapor Extraction Cleanout (Potential Sampling Point)
- ◆ Sub-Slab Vapor Sampling Point
- Solid Pipe Header and Riser
- - - Vapor Collection Boundary
- - - Perforated/Screened Venting Pipe
- Site Boundary

Sub-Parcel A11-1 - Architectural Overlay Passive/Active Venting System March 25, 2019		Figure 13b
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VENT TO ROOF LINE WITH
 1" SOLID-WALLED PIPING.
 CAP WITH WIND-BLOWN
 TURBINE (OPTIONAL
 CONNECTION TO ELECTRIC
 FAN IF REQUIRED)




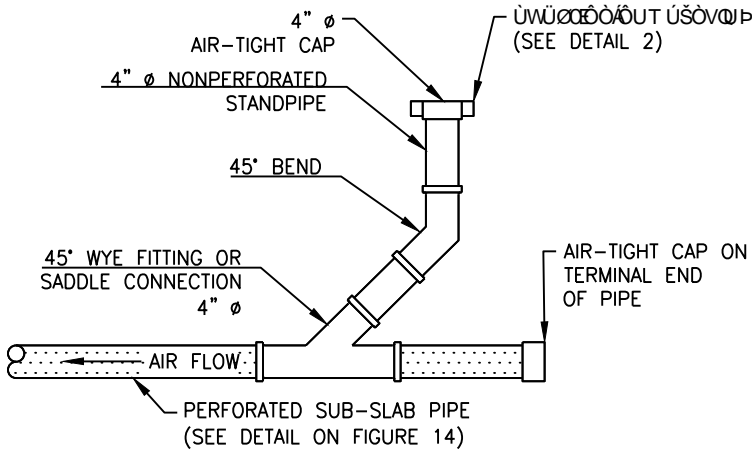
UNDER FLOOR SLAB VAPOR MITIGATION SYSTEM DETAIL

NOT TO SCALE

NOTES

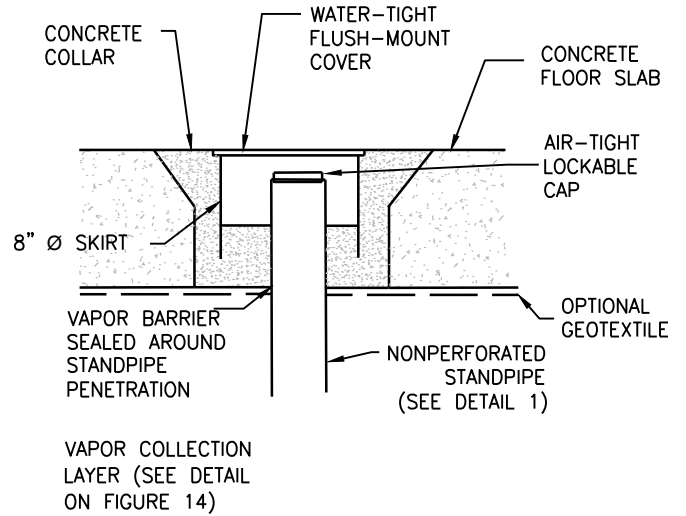
- 1. VAPOR BARRIER MEMBRANE SHALL BE INSTALLED IN ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS.
- 2. OPTIONAL VAPOR BARRIER MEMBRANE SHALL BE INSTALLED IN ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS.
- 3. VAPOR COLLECTION LAYER SHALL BE 1" OF GRANULAR FILL.
- 4. VENTING SYSTEM SHALL BE INSTALLED IN ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS.

Preliminary Sub-Slab Vapor Barrier and Venting System <small>REVISED 2018</small>		Figure 14
 ARM Group Inc. Engineers and Scientists		
Tradepoint Atlantic Baltimore County, MD EnviroAnalytics Group ARM Project 160443M-17		



1 DETAIL
 TUBING CONNECTION
 NOT TO SCALE

VAPOR COLLECTION LAYER AND COMPACTED SUBGRADE SHOWN ON FIGURE 14.



2 DETAIL
 TUBING COVER
 NOT TO SCALE

TUBING NOTES:

1. THE TUBING SHALL BE PROTECTED WITH FLUSH-MOUNT COVERS INSTALLED IN ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS. COVERS SHALL BE WATER-TIGHT CAST-IRON WITH RUBBER OR NEOPRENE GASKET. COVERS SHALL BE BOLTED TO THE MANHOLE FLANGE.
2. THE COVER SHALL BE CENTERED WITHIN THE MANHOLE, WITH APPROXIMATELY 2 INCHES OF CLEARANCE PROVIDED AROUND THE CASING AND THE INTERIOR SIDES AND COVER OF MANHOLE.

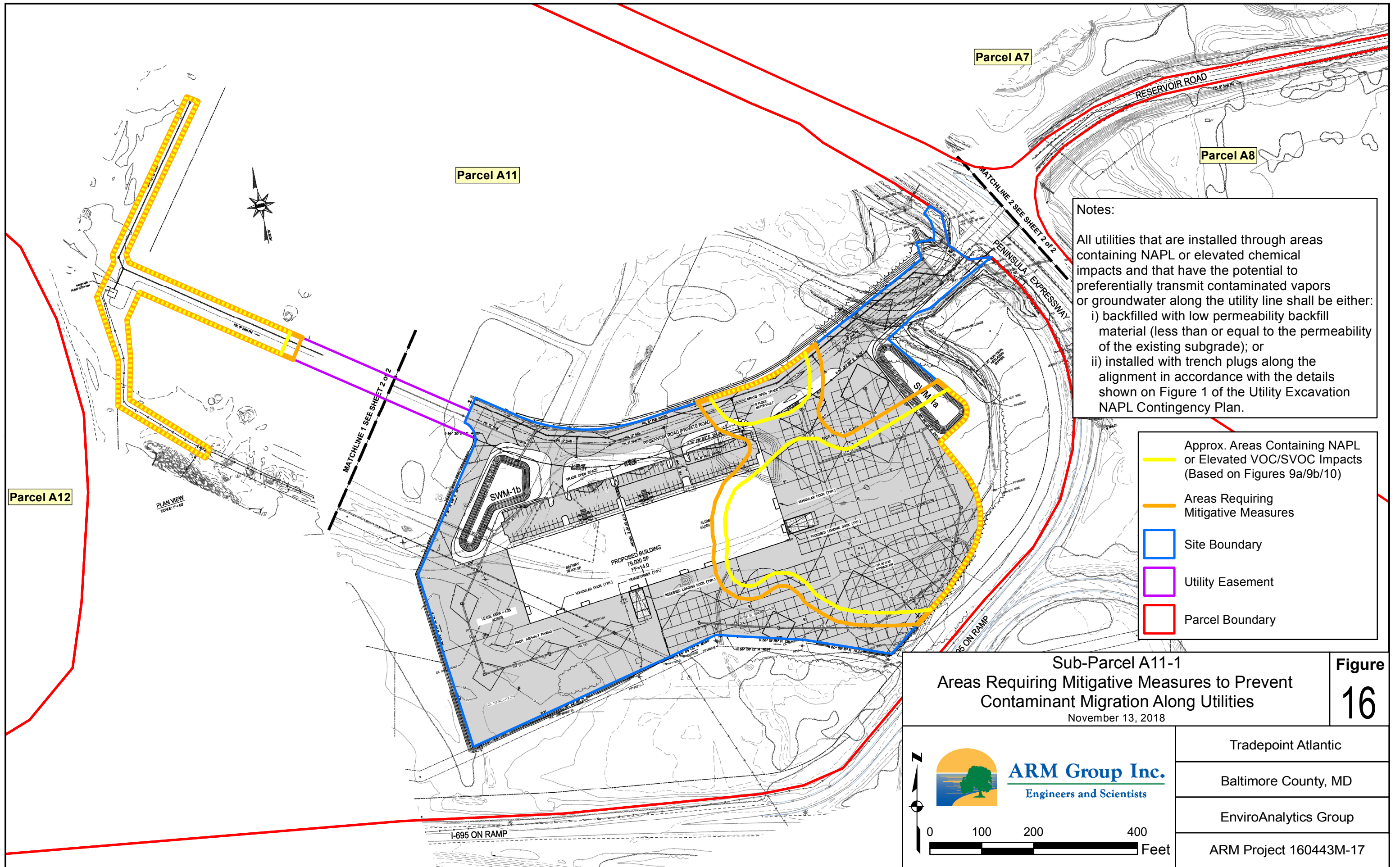
SUB-SLAB VENTING MONITORING POINT (VENTING SYSTEM CLEANOUT) DETAILS

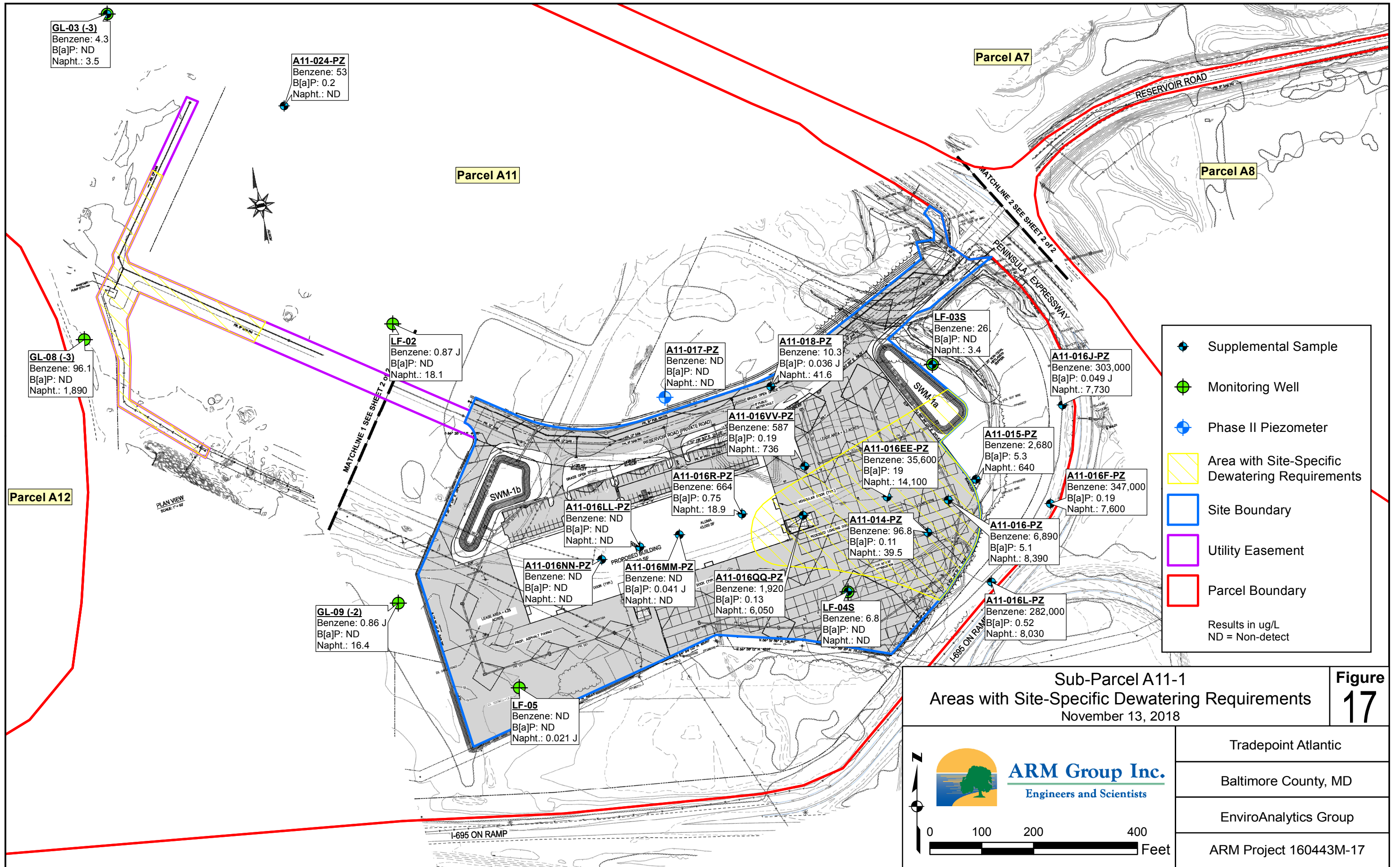
SUB-PARCEL A11-1 PRELIMINARY SUB-SLAB VAPOR BARRIER AND VENTING SYSTEM

NOVEMBER 2018	NOT TO SCALE	160443M-17
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 <p>ARM Group Inc. Engineers and Scientists</p>	<p>Figure 15</p>
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TABLES

**Table 1 - Sub-Parcel A11-1
Summary of Organics Detected in Soil**

Parameter	Units	PAL	Sample Date:	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016
			A11-004-SB-1	A11-004-SB-5	A11-004-SB-10	A11-005-SB-1	A11-005-SB-5	A11-005-SB-10	A11-006-SB-1	A11-006-SB-4	A11-006-SB-10	A11-007-SB-1	A11-008-SB-1	A11-008-SB-4	A11-009-SB-1	A11-010-SB-1	A11-010-SB-5	A11-011-SB-1	A11-011-SB-5	
Volatile Organic Compounds																				
1,2-Dichlorobenzene	mg/kg	9,300	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
1,2-Dichloroethene (Total)	mg/kg	2,300	0.01 U	0.0096 U	N/A	0.012 U	0.0098 U	N/A	0.013 U	0.012 U	N/A	0.013 U	0.01 U	0.011 U	0.013 U	0.0094 U	0.012 U	0.012 U	0.01 U	
1,3-Dichlorobenzene	mg/kg		0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
1,4-Dichlorobenzene	mg/kg	11	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
2-Butanone (MEK)	mg/kg	190,000	0.01 U	0.0096 U	N/A	0.012 U	0.0098 U	N/A	0.013 U	0.012 U	N/A	0.013 U	0.01 U	0.011 U	0.013 U	0.0094 U	0.012 U	0.012 U	0.01 U	
2-Hexanone	mg/kg	1,300	0.01 U	0.0096 U	N/A	0.012 U	0.0098 U	N/A	0.013 U	0.012 U	N/A	0.013 U	0.01 U	0.011 U	0.013 U	0.0094 U	0.012 U	0.012 U	0.01 U	
Acetone	mg/kg	670,000	0.01 U	0.014	N/A	0.029	0.015	N/A	0.019	0.012 U	N/A	0.013 U	0.01 U	0.063	0.013 U	0.0094 U	0.012 U	0.011 B	0.0092 B	
Benzene	mg/kg	5.1	0.0052 U	0.0048 U	N/A	0.0061 U	0.0017 J	N/A	0.0063 U	0.0074	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Carbon disulfide	mg/kg	3,500	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0039 J	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Chloroform	mg/kg	1.4	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
cis-1,2-Dichloroethene	mg/kg	2,300	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Cyclohexane	mg/kg	27,000	0.01 U	0.0096 U	N/A	0.012 U	0.0098 U	N/A	0.013 U	0.012 U	N/A	0.013 U	0.01 U	0.011 U	0.013 U	0.0094 U	0.012 U	0.012 U	0.01 U	
Ethylbenzene	mg/kg	25	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Isopropylbenzene	mg/kg	9,900	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Methyl Acetate	mg/kg	1,200,000	0.052 U	0.048 U	N/A	0.061 U	0.049 U	N/A	0.063 U	0.061 U	N/A	0.063 U	0.05 U	0.054 U	0.065 U	0.047 U	0.062 U	0.06 U	0.05 U	
Methyl tert-butyl ether (MTBE)	mg/kg	210	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Methylene Chloride	mg/kg	1,000	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Styrene	mg/kg	35,000	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Tetrachloroethene	mg/kg	100	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Toluene	mg/kg	47,000	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0022 J	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Trichloroethene	mg/kg	6	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Vinyl chloride	mg/kg	1.7	0.0052 U	0.0048 U	N/A	0.0061 U	0.0049 U	N/A	0.0063 U	0.0061 U	N/A	0.0063 U	0.005 U	0.0054 U	0.0065 U	0.0047 U	0.0062 U	0.006 U	0.005 U	
Xylenes	mg/kg	2,800	0.016 U	0.014 U	N/A	0.018 U	0.015 U	N/A	0.019 U	0.018 U	N/A	0.019 U	0.015 U	0.016 U	0.02 U	0.014 U	0.019 U	0.018 U	0.015 U	
Semi-Volatile Organic Compounds[^]																				
1,1-Biphenyl	mg/kg	200	0.018 J	0.019 J	N/A	0.084 U	0.081 U	N/A	0.018 J	0.22	N/A	0.085 U	0.072 U	0.079 U	0.074 U	0.018 J	0.096	0.074 U	0.082 U	
2,4-Dimethylphenol	mg/kg	16,000	0.081 U	0.073 U	N/A	0.084 U	0.081 U	N/A	0.08 U	0.075 U	N/A	0.085 U	0.072 U	0.079 U	0.074 U	0.072 U	0.081 U	0.074 U	0.082 U	
2-Chloronaphthalene	mg/kg	60,000	0.081 U	0.073 U	N/A	0.084 U	0.081 U	N/A	0.08 U	0.075 U	N/A	0.085 U	0.072 U	0.079 U	0.074 U	0.072 U	0.07 J	0.074 U	0.082 U	
2-Methylnaphthalene	mg/kg	3,000	0.1	0.062	N/A	0.032	0.081	0.0079 U	0.1	0.5	N/A	0.0086 U	0.011	0.008 U	0.074 U	0.011	0.3	0.0075 U	0.0082 U	
2-Methylphenol	mg/kg	41,000	0.081 U	0.073 U	N/A	0.084 U	0.081 U	N/A	0.08 U	0.075 U	N/A	0.085 U	0.072 U	0.079 U	0.074 U	0.072 U	0.081 U	0.074 U	0.082 U	
3&4-Methylphenol(m&p Cresol)	mg/kg	41,000	0.16 U	0.15 U	N/A	0.17 U	0.16 U	N/A	0.16 U	0.037 J	N/A	0.17 U	0.14 U	0.16 U	0.15 U	0.14 U	0.16 U	0.15 U	0.16 U	
Acenaphthene	mg/kg	45,000	0.12	0.05	N/A	0.08	0.056	0.0079 U	0.66	0.46	N/A	0.0086 U	0.0099	0.0011 J	0.074 U	0.0056 J	0.19	0.00048 J	0.0082 U	
Acenaphthylene	mg/kg	45,000	0.098	0.022	N/A	0.026	0.034	0.0079 U	0.015	0.59	N/A	0.0086 U	0.006 J	0.0026 J	0.074 U	0.0024 J	0.053	0.0012 J	0.0082 U	
Acetophenone	mg/kg	120,000	0.081 U	0.073 U	N/A	0.084 U	0.081 U	N/A	0.08 U	0.075 U	N/A	0.085 U	0.072 U	0.079 U	0.074 U	0.072 U	0.02 J	0.074 U	0.082 U	
Anthracene	mg/kg	230,000	0.4	0.16	N/A	0.048	0.2	0.0079 U	0.14	2.5	N/A	0.0086 U	0.012	0.003 J	0.0065 J	0.0055 J	0.48	0.0015 J	0.0082 U	
Benz[a]anthracene	mg/kg	21	1.2	1.5	N/A	0.45	0.51	0.0079 U	1.2	5.1	0.0083 U	0.085 U	0.3	0.12	0.13	0.097	1.8	0.074 U	0.082 U	
Benzaldehyde	mg/kg	120,000	0.018 J	0.073 U	N/A	0.084 U	0.081 U	N/A	0.08 U	0.075 U	N/A	0.085 U	0.072 U	0.079 U	0.074 U	0.072 U	0.049 J	0.074 U	0.082 U	
Benzo[a]pyrene	mg/kg	2.1	1	0.36	0.0082 U	0.42	0.44	0.0079 U	2.2	4.4	0.0083 U	0.0086 U	0.62	0.016	0.066 J	0.16	1.4	0.014	0.0082 U	
Benzo[b]fluoranthene	mg/kg	21	1.9	0.8	N/A	0.85	0.95	0.0079 U	4.4	9.8	0.00072 J	0.0011 J	0.87	0.053	0.11	0.34	3	0.023	0.0082 U	
Benzo[g,h,i]perylene	mg/kg		0.28	0.076	N/A	0.14	0.11	0.0079 U	0.6	0.85	N/A	0.0086 U	0.19	0.0062 J	0.039 J	0.058	0.42	0.0055 J	0.0082 U	
Benzo[k]fluoranthene	mg/kg	210	0.63	0.72	N/A	0.77	0.86	0.0079 U	4	8.9	N/A	0.0086 U	0.36	0.048	0.1	0.31	2.7	0.011	0.0082 U	
bis(2-chloroethoxy)methane	mg/kg	2,500	0.081 U	0.073 U	N/A	0.084 U	0.081 U	N/A	0.08 U	0.075 U	N/A	0.085 U	0.072 U	0.079 U	0.074 U	0.072 U	0.081 U	0.074 U	0.082 U	
bis(2-Ethylhexyl)phthalate	mg/kg	160	0.059 J	0.073 U	N/A	0.02 J	0.25	N/A	0.33	0.076	N/A	0.085 U	0.072 U	0.13	0.059 J	0.023 J	0.032 J	0.074 U	0.082 U	
Caprolactam	mg/kg	400,000	0.2 U	0.18 U	N/A	0.2 U	0.2 U	N/A	0.2 U	0.19 U	N/A	0.21 U	0.18 U	0.2 U	0.039 J	0.18 U	0.2 U	0.19 U	0.21 U	
Carbazole	mg/kg		0.056 J	0.23	N/A	0.033 J	0.03 J	N/A	0.076 J	2.4	N/A	0.085 U	0.072 U	0.079 U	0.074 U	0.072 U	0.6	0.074 U	0.082 U	
Chrysene	mg/kg	2,100	1.2	0.4	N/A	0.26	0.46	0.0079 U	1.1	4.8	N/A	0.00075 J	0.35	0.019	0.12	0.11	1.5	0.011	0.0082 U	
Dibenz[a,h]anthracene	mg/kg	2.1	0.12	0.038	N/A	0.056	0.048	0.0079 U	0.22	0.36	0.0083 U	0.0086 U	0.064	0.0022 J	0.074 U	0.017	0.16	0.0016 J	0.0082 U	
Fluoranthene	mg/kg	30,000	2.4	0.86	N/A	0.28	1.1	0.0079 U	0.95	11	N/A	0.0013 J	0.23	0.023	0.038 J	0.096	3	0.012	0.0082 U	
Fluorene	mg/kg	30,000	0.14	0.091	N/A	0.014	0.098	0.0079 U	0.084	1.4	N/A	0.0086 U	0.0022 J	0.0014 J	0.074 U	0.0016 J	0.31	0.0075 U	0.0082 U	
Indeno[1,2,3-c,d]pyrene	mg/kg	21	0.32	0.095	N/A	0.15	0.14	0.0079 U	0.74	1	0.0083 U	0.0086 U	0.2	0.0065 J	0.018 J	0.056	0.48			

Table 1 - Sub-Parcel A11-1
Summary of Organics Detected in Soil

Parameter	Units	PAL	Sample Date:	7/28/2016	7/28/2016	7/28/2016	7/28/2016	3/7/2017	3/7/2017	3/7/2017	7/26/2018	7/26/2018	7/26/2018	7/26/2018	3/8/2017	3/8/2017	3/8/2017	7/26/2018	7/26/2018	7/26/2018
			A11-012-SB-1	A11-012-SB-4	A11-013-SB-1	A11-013-SB-7	A11-014-SB-1	A11-014-SB-5	A11-014-SB-10	A11-014-SB-1 Supplemental	A11-014-SB-5 Supplemental	A11-014-SB-10 Supplemental	A11-014-SB-15 Supplemental	A11-016-SB-1	A11-016-SB-4	A11-016-SB-10	A11-016-SB-3 Supplemental	A11-016-SB-10 Supplemental	A11-016-SB-15 Supplemental	
Volatile Organic Compounds																				
1,2-Dichlorobenzene	mg/kg	9,300	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.37 U	51.7 U	0.38 U	
1,2-Dichloroethene (Total)	mg/kg	2,300	0.0098 U	0.0095 U	0.0097 U	0.0099 U	0.01 U	8.8 U	0.0093 U	0.0087 U	0.012 U	0.012 U	0.013 U	0.01 U	0.62 U	168 U	0.75 U	103 U	0.75 U	
1,3-Dichlorobenzene	mg/kg		0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.37 U	51.7 U	0.38 U	
1,4-Dichlorobenzene	mg/kg	11	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.37 U	51.7 U	0.38 U	
2-Butanone (MEK)	mg/kg	190,000	0.0098 U	0.0095 U	0.0097 U	0.0099 U	0.011	8.8 U	0.0093 U	0.0087 U	0.012 U	0.012 U	0.013 U	0.01 U	0.62 U	168 U	0.75 U	103 U	0.75 U	
2-Hexanone	mg/kg	1,300	0.0098 U	0.0095 U	0.0097 U	0.0099 U	0.01 U	8.8 U	0.0093 U	0.0087 U	0.012 U	0.012 U	0.013 U	0.01 U	0.62 U	168 U	0.75 U	103 U	0.75 U	
Acetone	mg/kg	670,000	0.0098 U	0.0095 U	0.0058 B	0.01 B	0.021	8.8 U	0.012	0.15	0.32	0.11	0.31	0.023	0.62 U	168 U	0.75 U	103 U	0.75 U	
Benzene	mg/kg	5.1	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0032 J	802	32.3	0.0013 J	0.11	7.7	6.7	0.0051 U	1.2	2,120	57.8	4,460	1,630	
Carbon disulfide	mg/kg	3,500	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.17 J	51.7 U	0.38 U	
Chloroform	mg/kg	1.4	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.37 U	51.7 U	0.38 U	
cis-1,2-Dichloroethene	mg/kg	2,300	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.37 U	51.7 U	0.38 U	
Cyclohexane	mg/kg	27,000	0.0098 U	0.0095 U	0.0097 U	0.0099 U	0.01 U	8.8 U	0.0093 U	0.0087 U	0.012 U	0.012 U	0.013 U	0.01 U	0.62 U	168 U	0.75 U	103 U	0.33 J	
Ethylbenzene	mg/kg	25	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	3.9 J	0.0087	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	6.3	51.7 U	3.7	
Isopropylbenzene	mg/kg	9,900	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	1.7	51.7 U	0.82	
Methyl Acetate	mg/kg	1,200,000	0.049 U	0.047 U	0.048 U	0.05 U	0.051 U	44.2 U	0.047 U	0.043 U	0.015 J	0.0067 J	0.017 J	0.051 U	3.1 U	838 U	0.2 J	517 U	3.8 U	
Methyl tert-butyl ether (MTBE)	mg/kg	210	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.37 U	51.7 U	0.38 U	
Methylene Chloride	mg/kg	1,000	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.13	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.37 U	51.7 U	0.38 U	
Styrene	mg/kg	35,000	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.28 J	51.7 U	0.38 U	
Tetrachloroethene	mg/kg	100	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.37 U	51.7 U	0.38 U	
Toluene	mg/kg	47,000	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0017 J	4.5	0.019	0.0043 U	0.0038 J	0.0061 U	0.0063 U	0.0051 U	0.56	845	87.3	515	224	
Trichloroethene	mg/kg	6	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.37 U	51.7 U	0.38 U	
Vinyl chloride	mg/kg	1.7	0.0049 U	0.0047 U	0.0048 U	0.005 U	0.0051 U	4.4 U	0.0047 U	0.0043 U	0.0059 U	0.0061 U	0.0063 U	0.0051 U	0.31 U	83.8 U	0.37 U	51.7 U	0.38 U	
Xylenes	mg/kg	2,800	0.015 U	0.014 U	0.015 U	0.015 U	0.015 U	251	0.22	0.013 U	0.018 U	0.018 U	0.019 U	0.0038 J	0.32 J	681	113	196	92	
Semi-Volatile Organic Compounds^																				
1,1-Biphenyl	mg/kg	200	0.074 U	0.075 U	0.072 U	0.081 U	0.7 U	25.8	0.082 U	N/A	N/A	N/A	N/A	0.71 U	7	13.1	N/A	N/A	N/A	
2,4-Dimethylphenol	mg/kg	16,000	0.074 U	0.075 U	0.072 U	0.081 U	0.7 U	13.1	0.041 J	N/A	N/A	N/A	N/A	0.71 U	1.6 U	2.1 U	N/A	N/A	N/A	
2-Chloronaphthalene	mg/kg	60,000	0.074 U	0.075 U	0.072 U	0.081 U	0.7 U	2 U	0.082 U	N/A	N/A	N/A	N/A	0.71 U	1.6 U	2.1 U	N/A	N/A	N/A	
2-Methylnaphthalene	mg/kg	3,000	0.12	0.0077 U	0.0088	0.0082 U	0.065 J	20.1	0.029	0.13	0.014	0.019	0.0084 U	0.22	7	36.4	713	928	108	
2-Methylphenol	mg/kg	41,000	0.074 U	0.075 U	0.072 U	0.081 U	0.7 U	0.65 J	0.049 J	N/A	N/A	N/A	N/A	0.71 U	1.6 U	2.1 U	N/A	N/A	N/A	
3&4-Methylphenol(m&p Cresol)	mg/kg	41,000	0.15 U	0.15 U	0.14 U	0.16 U	1.4 U	2.7 J	0.039 J	N/A	N/A	N/A	N/A	1.4 U	0.4 J	1.1 J	N/A	N/A	N/A	
Acenaphthene	mg/kg	45,000	0.01	0.0077 U	0.0064 J	0.0082 U	0.18	11.3	0.0022 J	0.22	0.0026 J	0.0057 J	0.0084 U	0.43	2.9	10	63.8	48.2	5.8	
Acenaphthylene	mg/kg	45,000	0.12	0.0077 U	0.01	0.0082 U	0.072	8.9	0.0019 J	0.082	0.0094	0.021	0.0084 U	1.1	24.9	27.9	149	43.4	3.5	
Acetophenone	mg/kg	120,000	0.074 U	0.075 U	0.072 U	0.081 U	0.7 U	2 U	0.047 J	N/A	N/A	N/A	N/A	0.71 U	1.5 J	2.1 U	N/A	N/A	N/A	
Anthracene	mg/kg	230,000	0.1	0.0077 U	0.027	0.0082 U	0.16	121	0.012	0.19	0.03	0.079	0.00081 J	1.3	64.9	69.4	879	230	41.6	
Benz[a]anthracene	mg/kg	21	0.4	0.075 U	0.35	0.081 U	0.69 J	95.1	0.082 U	0.52	0.032	0.072	0.0019 J	8	90.1	33.7	911	209	31	
Benzaldehyde	mg/kg	120,000	0.028 J	0.075 U	0.072 U	0.081 U	0.7 U	2 U	0.082 U	N/A	N/A	N/A	N/A	0.71 U	1.6 U	2.1 U	N/A	N/A	N/A	
Benzo[a]pyrene	mg/kg	2.1	0.54	0.0077 U	0.2	0.0031 J	1	57.3	0.0073 J	0.9	0.025	0.058	0.0014 J	5.9	88.1	23.6	738	145	18.5	
Benzo[b]fluoranthene	mg/kg	21	1.4	0.0014 J	0.46	0.0075 J	1.2	106	0.012	1.8	0.047	0.087	0.0014 J	15.7	118	39.7	999	231	30.3	
Benzo[g,h,i]perylene	mg/kg		0.22	0.0077 U	0.062	0.0082 U	0.74	14.3	0.0058 J	0.3	0.013	0.036	0.0084 U	4.1	22.2	7.2	177	57	3.7	
Benzo[k]fluoranthene	mg/kg	210	1.3	0.0077 U	0.41	0.0068 J	0.47	99.3	0.011	1.5	0.04	0.034	0.0084 U	14.8	21.6	37.3	166	60.4	12.4	
bis(2-chloroethoxy)methane	mg/kg	2,500	0.074 U	0.075 U	0.072 U	0.081 U	0.7 U	2 U	0.082 U	N/A	N/A	N/A	N/A	0.71 U	1.6 U	2.1 U	N/A	N/A	N/A	
bis(2-Ethylhexyl)phthalate	mg/kg	160	0.031 J	0.075 U	0.072 U	0.081 U	0.7 U	2 U	0.082 U	N/A	N/A	N/A	N/A	0.71 U	1.6 U	2.1 U	N/A	N/A	N/A	
Caprolactam	mg/kg	400,000	0.19 U	0.19 U	0.18 U	0.2 U	1.8 U	5.1 U	0.2 U	N/A	N/A	N/A	N/A	1.8 U	4 U	5.3 U	N/A	N/A	N/A	
Carbazole	mg/kg		0.032 J	0.075 U	0.037 J	0.081 U	0.7 U	13.4	0.082 U	N/A	N/A	N/A	N/A	0.71 U	16	17.8	N/A	N/A	N/A	
Chrysene	mg/kg	2,100	0.44	0.00065 J	0.22	0.0033 J	0.6	76.7	0.01	0.53	0.026	0.063	0.00098 J	8	74.7	25.7	722	155	25.1	
Dibenz[a,h]anthracene	mg/kg	2.1	0.075	0.0077 U	0.021	0.0082 U	0.25	7.2	0.0014 J	0.12	0.0038 J	0.01	0.0084 U	1.9	9	3	69.2	22.1	1.8	
Fluoranthene	mg/kg	30,000	0.56	0.0011 J	0.34	0.006 J	0.71	321	0.037	0.73	0.091	0.22	0.0026 J	8	128	154	3,910	1,540	102	
Fluorene	mg/kg	30,000	0.012	0.0077 U	0.0068 J	0.0082 U	0.088	113	0.013	0.16	0.026	0.055	0.0011 J	0.15	30.4	80.2	894	792	112	
Indeno[1,2,3-c,d]pyrene	mg/kg	21	0.23	0.0077 U	0.061	0.0082 U	0.73													

Table 1 - Sub-Parcel A11-1
Summary of Organics Detected in Soil

Parameter	Units	PAL	Sample Date:	6/29/2018	6/29/2018	6/29/2018	7/31/2018	7/31/2018	7/31/2018	8/9/2018	8/9/2018	8/9/2018	8/9/2018	6/25/2018	6/25/2018	6/25/2018	8/1/2018
			A11-016A-SB-15	A11-016A-SB-20	A11-016A-SB-24	A11-016AA-SB-5	A11-016AA-SB-10	A11-016AA-SB-15	A11-016AAA-SB-3	A11-016AAA-SB-5	A11-016AAA-SB-10	A11-016AAA-SB-15	A11-016B-SB-5	A11-016B-SB-10	A11-016B-SB-15	A11-016BB-SB-10	
Volatiles Organic Compounds																	
1,2-Dichlorobenzene	mg/kg	9,300	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	40 U	
1,2-Dichloroethene (Total)	mg/kg	2,300	0.011 U	0.0084 U	0.011 U	0.0091 U	0.46 U	0.48 U	0.009 U	0.013 U	0.0081 U	0.0091 U	0.0097 U	0.73 U	0.0089 U	80 U	
1,3-Dichlorobenzene	mg/kg		0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	40 U	
1,4-Dichlorobenzene	mg/kg	11	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	40 U	
2-Butanone (MEK)	mg/kg	190,000	0.016	0.0084 U	0.011 U	0.0072 J	0.46 U	0.48 U	0.009 U	0.035	0.013	0.0091 U	0.011	0.73 U	0.01	80 U	
2-Hexanone	mg/kg	1,300	0.011 U	0.0084 U	0.011 U	0.0091 U	0.46 U	0.48 U	0.009 U	0.013 U	0.0081 U	0.0091 U	0.0097 U	0.73 U	0.0089 U	80 U	
Acetone	mg/kg	670,000	0.56 U	0.0084 U	0.24	0.27	0.46 U	0.48 U	0.035	0.81 U	0.84	0.045	0.18	0.74	0.15	80 U	
Benzene	mg/kg	5.1	0.0031 J	0.059	0.025	0.11	6.8	3.3	0.002 J	3.2	0.075	1.5	246	1,360	56.4	3,110	
Carbon disulfide	mg/kg	3,500	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.012	0.004 U	0.0046 U	0.0067	0.16 J	0.003 J	40 U	
Chloroform	mg/kg	1.4	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	40 U	
cis-1,2-Dichloroethene	mg/kg	2,300	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	40 U	
Cyclohexane	mg/kg	27,000	0.011 U	0.0084 U	0.011 U	0.0091 U	0.46 U	0.48 U	0.009 U	0.0038 J	0.0081 U	0.0091 U	0.01	0.44 J	0.0028 J	80 U	
Ethylbenzene	mg/kg	25	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.013	0.004 U	0.0046 U	0.063	3.3	0.019	40 U	
Isopropylbenzene	mg/kg	9,900	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0068	0.004 U	0.0046 U	0.007	0.77	0.0022 J	40 U	
Methyl Acetate	mg/kg	1,200,000	0.021 J	0.0083 B	0.017 B	0.14	0.11 J	0.088 J	0.045 U	0.03 J	0.031 J	0.046 U	0.0077 J	0.32 J	0.0021 J	400 U	
Methyl tert-butyl ether (MTBE)	mg/kg	210	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	40 U	
Methylene Chloride	mg/kg	1,000	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	84.3	
Styrene	mg/kg	35,000	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	40 U	
Tetrachloroethene	mg/kg	100	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	40 U	
Toluene	mg/kg	47,000	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0039 J	0.004 U	0.0046 U	2.2	23.4	0.11	490	
Trichloroethene	mg/kg	6	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	40 U	
Vinyl chloride	mg/kg	1.7	0.0057 U	0.0042 U	0.0056 U	0.0046 U	0.23 U	0.24 U	0.0045 U	0.0067 U	0.004 U	0.0046 U	0.0049 U	0.37 U	0.0045 U	40 U	
Xylenes	mg/kg	2,800	0.017 U	0.013 U	0.017 U	0.014 U	0.69 U	0.72 U	0.014 U	0.015 J	0.012 U	0.014 U	38	38.3	0.28	240	
Semi-Volatile Organic Compounds^																	
1,1-Biphenyl	mg/kg	200	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2,4-Dimethylphenol	mg/kg	16,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2-Chloronaphthalene	mg/kg	60,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2-Methylnaphthalene	mg/kg	3,000	0.0064 J	0.077	0.008 U	0.0078 U	0.0082 U	0.0082 U	0.078	0.094 U	0.0076 U	0.015	268	234	0.13	1,500	
2-Methylphenol	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
3&4-Methylphenol(m&p Cresol)	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Acenaphthene	mg/kg	45,000	0.0016 J	0.39	0.008 U	0.0078 U	0.0082 U	0.0082 U	0.015	6.7	0.0076 U	0.0024 J	148	317	0.041	104	
Acenaphthylene	mg/kg	45,000	0.0014 J	0.1	0.008 U	0.0078 U	0.0082 U	0.0082 U	0.2	5.5	0.0076 U	0.0014 J	54.1	91.1	0.077	1,040	
Acetophenone	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Anthracene	mg/kg	230,000	0.0083	0.13	0.0016 J	0.0078 U	0.0082 U	0.0082 U	0.18	93	0.0076 U	0.0041 J	507	721	0.26	2,310	
Benz[a]anthracene	mg/kg	21	0.0077 J	0.74	0.0026 J	0.0078 U	0.0082 U	0.0082 U	0.61	87.8	0.0034 J	0.013	563	780	0.16	2,270	
Benzaldehyde	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Benzo[a]pyrene	mg/kg	2.1	0.0049 J	1.4	0.0013 J	0.0078 U	0.0011 J	0.0082 U	0.68	107	0.00073 J	0.0043 J	472	646	0.12	1,820	
Benzo[b]fluoranthene	mg/kg	21	0.0075 J	1.6	0.0017 J	0.0078 U	0.0025 J	0.0082 U	1.4	442	0.0046 J	0.02	609	874	0.16	2,860	
Benzo[g,h,i]perylene	mg/kg		0.0016 J	0.83	0.0016 J	0.0078 U	0.0082 U	0.0082 U	0.31	6.6	0.0012 J	0.0054 J	255	305	0.031	429	
Benzo[k]fluoranthene	mg/kg	210	0.0032 J	0.67	0.008 U	0.0078 U	0.0018 J	0.0082 U	1.2	395	0.0041 J	0.018	270	314	0.078	2,100	
bis(2-chloroethoxy)methane	mg/kg	2,500	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
bis(2-Ethylhexyl)phthalate	mg/kg	160	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Caprolactam	mg/kg	400,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Carbazole	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Chrysene	mg/kg	2,100	0.0066 J	0.68	0.0014 J	0.0078 U	0.0082 U	0.0082 U	0.63	79.9	0.0031 J	0.014	508	650	0.14	1,640	
Dibenz[a,h]anthracene	mg/kg	2.1	0.0081 U	0.38	0.008 U	0.0078 U	0.0082 U	0.0082 U	0.13	2.8	0.0076 U	0.0022 J	88	121	0.012	172	
Fluoranthene	mg/kg	30,000	0.021	0.84	0.0054 J	0.0078 U	0.00092 J	0.0082 U	0.78	414	0.007 J	0.033	2,690	3,860	0.54	5,260	
Fluorene	mg/kg	30,000	0.0051 J	0.053	0.001 J	0.0078 U	0.0082 U	0.0082 U	0.068	132	0.0012 J	0.012	506	650	0.28	1,850	
Indeno[1,2,3-c,d]pyrene	mg/kg	21	0.0018 J	0.83	0.008 U	0.0078 U	0.0082 U	0.0082 U	0.36	7.2	0.0076 U	0.0053 J	254	327	0.036	502	
Isophorone	mg/kg	2,400	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Naphthalene	mg/kg	17	0.069	0.39	0.0057 B	0.01	0.079	0.014	1.2	4.2	0.0018 J	0.25	1,760	3,150	1.3	39,400	
Phenanthrene	mg/kg		0.022	0.39	0.0054 J	0.0011 J	0.00095 J	0.0012 J	0.35	682	0.0056 J	0.036	3,580	5,130	1	7,610	
Phenol	mg/kg	250,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Pyrene	mg/kg	23,000	0.015	0.76	0.0038 J	0.0078 U	0.0082 U	0.0082 U	0.68	152	0.0034 J	0.018	1,020	1,330	0.35	3,600	
PCBs																	
Aroclor 1242	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Aroclor 1248	mg/kg	0.94	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Aroclor 1254	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Aroclor 1260	mg/kg	0.99	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Aroclor 1262	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
PCBs (total)	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
TPH/Oil and Grease																	
Diesel Range Organics	mg/kg	6,200	6.9 J	4.1 J	3.8 J	5.7 J	5.7 J	6.2 J	51.2								

**Table 1 - Sub-Parcel A11-1
Summary of Organics Detected in Soil**

Parameter	Units	Sample Date:	7/31/2018	7/31/2018	7/31/2018	7/31/2018	8/13/2018	8/13/2018	8/13/2018	8/3/2018	8/3/2018	8/3/2018	8/3/2018	8/13/2018	8/13/2018
		PAL	A11-016GG-SB-8.5	A11-016GG-SB-10	A11-016GG-SB-15	A11-016GG-SB-20	A11-016GGG-SB-5	A11-016GGG-SB-10	A11-016GGG-SB-15	A11-016HH-SB-3	A11-016HH-SB-5	A11-016HH-SB-10	A11-016HH-SB-15	A11-016HHH-SB-5	A11-016HHH-SB-10
Volatile Organic Compounds															
1,2-Dichlorobenzene	mg/kg	9,300	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
1,2-Dichloroethene (Total)	mg/kg	2,300	0.0072 U	0.016 U	1.1 U	0.49 U	0.0098 U	0.0084 U	0.0089 U	0.014 U	0.0077 U	0.0084 U	0.0082 U	0.011 U	0.0081 U
1,3-Dichlorobenzene	mg/kg		0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
1,4-Dichlorobenzene	mg/kg	11	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
2-Butanone (MEK)	mg/kg	190,000	0.01	0.014 J	1.1 U	0.49 U	0.0074 J	0.0086 U	0.0048 J	0.014 U	0.0077 U	0.0084 U	0.0082 U	0.01 U	0.0083 U
2-Hexanone	mg/kg	1,300	0.0072 U	0.016 U	1.1 U	0.49 U	0.01 U	0.0086 U	0.0089 U	0.014 U	0.0077 U	0.0084 U	0.0082 U	0.01 U	0.0083 U
Acetone	mg/kg	670,000	0.6	0.36	1.1 U	0.49 U	0.18	0.13	0.16	0.014 U	0.062	0.033	0.0082 U	0.028	0.14
Benzene	mg/kg	5.1	0.0023 J	0.058	3	3.6	0.0049 U	0.0042 U	0.0045 U	0.0068 U	0.0038 U	0.0021 J	0.0041 U	0.0055 U	0.0041 U
Carbon disulfide	mg/kg	3,500	0.0036 U	0.006 J	0.57 U	0.11 J	0.0052 U	0.0043 U	0.0045 U	0.0039 J	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
Chloroform	mg/kg	1.4	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
cis-1,2-Dichloroethene	mg/kg	2,300	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0049 U	0.0042 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.0055 U	0.0041 U
Cyclohexane	mg/kg	27,000	0.0072 U	0.016 U	1.1 U	0.49 U	0.01 U	0.0086 U	0.0089 U	0.014 U	0.0077 U	0.0084 U	0.0082 U	0.01 U	0.0083 U
Ethylbenzene	mg/kg	25	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
Isopropylbenzene	mg/kg	9,900	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
Methyl Acetate	mg/kg	1,200,000	0.096	0.16	0.99 J	0.39 J	0.0059 J	0.0059 J	0.0029 J	0.068 U	0.038 U	0.042 U	0.041 U	0.05 U	0.0042 J
Methyl tert-butyl ether (MTBE)	mg/kg	210	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
Methylene Chloride	mg/kg	1,000	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
Styrene	mg/kg	35,000	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
Tetrachloroethene	mg/kg	100	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
Toluene	mg/kg	47,000	0.0036 U	0.0024 J	0.28 J	0.13 J	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
Trichloroethene	mg/kg	6	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
Vinyl chloride	mg/kg	1.7	0.0036 U	0.0079 U	0.57 U	0.24 U	0.0052 U	0.0043 U	0.0045 U	0.0068 U	0.0038 U	0.0042 U	0.0041 U	0.005 U	0.0041 U
Xylenes	mg/kg	2,800	0.011 U	0.024 U	1.7 U	0.73 U	0.016 U	0.013 U	0.013 U	0.02 U	0.011 U	0.013 U	0.012 U	0.015 U	0.012 U
Semi-Volatile Organic Compounds^															
1,1-Biphenyl	mg/kg	200	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2,4-Dimethylphenol	mg/kg	16,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2-Chloronaphthalene	mg/kg	60,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2-Methylnaphthalene	mg/kg	3,000	0.086	0.035	0.021	0.83	0.32	0.0081 U	0.0085 U	0.12	0.0075 U	0.12	0.015	0.069	0.0078 U
2-Methylphenol	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3&4-Methylphenol(m&p Cresol)	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Acenaphthene	mg/kg	45,000	0.012	0.0054 J	0.0028 J	0.24	0.63	0.0081 U	0.0085 U	0.25	0.0075 U	0.0025 J	0.0022 J	0.044	0.0078 U
Acenaphthylene	mg/kg	45,000	0.036	0.027	0.0099	0.76	0.12	0.0081 U	0.0035 J	0.011	0.0075 U	0.0079 U	0.0084 U	0.32	0.0078 U
Acetophenone	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Anthracene	mg/kg	230,000	0.099	0.012	0.0066 J	0.95	2	0.0081 U	0.0074 J	0.59	0.0075 U	0.025	0.0084 U	0.53	0.0078 U
Benz[a]anthracene	mg/kg	21	0.17	0.042	0.0034 J	1.8	4.1	0.0026 J	0.015	1.9	0.0015 J	0.0069 J	0.0084 U	2.6	0.0078 U
Benzaldehyde	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Benzo[a]pyrene	mg/kg	2.1	0.16	0.054	0.00093 J	1.6	3.7	0.0012 J	0.01	1.1	0.0075 U	0.0013 J	0.0084 U	2.7	0.0078 U
Benzo[b]fluoranthene	mg/kg	21	0.31	0.12	0.0025 J	2.8	7.2	0.0025 J	0.019	1.4	0.0075 U	0.0016 J	0.0084 U	5.1	0.0078 U
Benzo[g,h,i]perylene	mg/kg		0.082	0.023	0.0086 U	0.27	1.2	0.0081 U	0.0051 J	0.63	0.0075 U	0.0079 U	0.0084 U	1.2	0.0078 U
Benzo[k]fluoranthene	mg/kg	210	0.23	0.085	0.0019 J	2	6.4	0.0022 J	0.017	0.6	0.0075 U	0.0079 U	0.0084 U	4.5	0.0078 U
bis(2-chloroethoxy)methane	mg/kg	2,500	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
bis(2-Ethylhexyl)phthalate	mg/kg	160	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Caprolactam	mg/kg	400,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Carbazole	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chrysene	mg/kg	2,100	0.17	0.039	0.0019 J	1.4	3.7	0.0014 J	0.013	1.2	0.00075 J	0.0055 J	0.0084 U	1.6	0.0078 U
Dibenz[a,h]anthracene	mg/kg	2.1	0.027	0.0076	0.0086 U	0.049	0.48	0.0081 U	0.0085 U	0.31	0.0075 U	0.0079 U	0.0084 U	0.54	0.0078 U
Fluoranthene	mg/kg	30,000	0.35	0.063	0.016	4.6	7.6	0.0027 J	0.031	2.1	0.0014 J	0.025	0.0084 U	4.8	0.0078 U
Fluorene	mg/kg	30,000	0.13	0.0094	0.019	1.9	0.63	0.0081 U	0.0027 J	0.25	0.0075 U	0.04	0.0084 U	0.13	0.0078 U
Indeno[1,2,3-c,d]pyrene	mg/kg	21	0.066	0.023	0.0086 U	0.32	1.2	0.0081 U	0.0049 J	0.54	0.0075 U	0.0079 U	0.0084 U	1.2	0.0078 U
Isophorone	mg/kg	2,400	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Naphthalene	mg/kg	17	0.65	0.14	0.23	9.6	1.1 B	0.0095 B	0.011 B	0.066	0.0019 J	1.9	0.17	0.25 B	0.0078 U
Phenanthrene	mg/kg		0.5	0.033	0.046	5.4	5.1	0.0019 J	0.025	2.6	0.002 J	0.092	0.00084 J	1.4	0.0078 U
Phenol	mg/kg	250,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Pyrene	mg/kg	23,000	0.22	0.045	0.011	3.1	6.3	0.0022 J	0.023	2.4	0.001 J	0.012	0.0084 U	3.9	0.0078 U
PCBs															
Aroclor 1242	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1248	mg/kg	0.94	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1254	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1260	mg/kg	0.99	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1262	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PCBs (total)	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TPH/Oil and Grease															
Diesel Range Organics	mg/kg	6,200	111	180	9.8	514	228	5.9 J	8.9	70.6	14.1	6 J	7.1 J	82.6	6.3 J
Gasoline Range Organics	mg/kg	6,200	8.6 U	12.5 U	21.8 U	9.6 U	8.5 U	9.8 U	9.6 U	20.5 U	8.7 U	10.6 U	10.3 U	12.5 U	7.6 U
Oil and Grease	mg/kg	6,200	4,640	683	291	1,280	571	255	395	278	166	324	288	236	594

Detections in bold

Values in red indicate an exceedance of the Project Action Limit (PAL)

N/A indicates that the parameter was not analyzed for this sample

^PAH compounds were analyzed via SIM

**Table 1 - Sub-Parcel A11-1
Summary of Organics Detected in Soil**

Parameter	Units	Sample Date:	7/27/2018	8/2/2018	8/2/2018	7/27/2018	7/27/2018	7/27/2018	8/7/2018	8/7/2018	8/7/2018	8/7/2018	7/30/2018	7/30/2018	7/30/2018	7/30/2018
		PAL	A11-016T-SB-1	A11-016TT-SB-3	A11-016TT-SB-5	A11-016U-SB-5	A11-016U-SB-10	A11-016U-SB-15	A11-016UU-SB-3	A11-016UU-SB-5	A11-016UU-SB-10	A11-016UU-SB-15	A11-016V-SB-3	A11-016V-SB-5	A11-016V-SB-10	A11-016V-SB-15
Volatile Organic Compounds																
1,2-Dichlorobenzene	mg/kg	9,300	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
1,2-Dichloroethene (Total)	mg/kg	2,300	0.009 U	96.5 U	87.4 U	60.6 U	0.52 U	0.51 U	0.0088 U	0.0084 U	0.0088 U	0.0087 U	0.53 U	0.51 U	0.49 U	0.46 U
1,3-Dichlorobenzene	mg/kg		0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
1,4-Dichlorobenzene	mg/kg	11	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
2-Butanone (MEK)	mg/kg	190,000	0.009 U	96.5 U	87.4 U	60.6 U	0.52 U	0.51 U	0.014	0.0084 U	0.0088 U	0.0087 U	0.53 U	0.51 U	0.49 U	0.46 U
2-Hexanone	mg/kg	1,300	0.009 U	96.5 U	87.4 U	60.6 U	0.52 U	0.51 U	0.0088 U	0.0084 U	0.0088 U	0.0087 U	0.53 U	0.51 U	0.49 U	0.46 U
Acetone	mg/kg	670,000	0.25	96.5 U	87.4 U	60.6 U	0.52 U	0.51 U	0.48 U	0.032	0.053	0.22	0.53 U	0.6	0.49	0.46 U
Benzene	mg/kg	5.1	0.092	2,250	3,030	242	27.4	15.7	0.0025 J	0.019	0.0038 J	0.0064	126	59	60.4	53.1
Carbon disulfide	mg/kg	3,500	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.002 J	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
Chloroform	mg/kg	1.4	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
cis-1,2-Dichloroethene	mg/kg	2,300	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
Cyclohexane	mg/kg	27,000	0.0033 J	96.5 U	87.4 U	60.6 U	0.52 U	0.51 U	0.0088 U	0.0084 U	0.0088 U	0.0087 U	0.15 J	0.51 U	0.49 U	0.46 U
Ethylbenzene	mg/kg	25	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	2.4	0.12 J	0.24 U	0.23 U
Isopropylbenzene	mg/kg	9,900	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.41	0.25 U	0.24 U	0.23 U
Methyl Acetate	mg/kg	1,200,000	0.0064 J	482 U	437 U	303 U	0.34 J	2.6 U	0.047	0.042 U	0.044 U	0.0053 J	2.6 U	0.17 J	2.4 U	2.3 U
Methyl tert-butyl ether (MTBE)	mg/kg	210	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
Methylene Chloride	mg/kg	1,000	0.0045 U	124	95.5	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.29	0.31	0.24
Styrene	mg/kg	35,000	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
Tetrachloroethene	mg/kg	100	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
Toluene	mg/kg	47,000	0.0043 J	153	292	81.7	0.26 U	0.11 J	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.077 J	0.1 J	1.6	1.8
Trichloroethene	mg/kg	6	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
Vinyl chloride	mg/kg	1.7	0.0045 U	48.2 U	43.7 U	30.3 U	0.26 U	0.26 U	0.0044 U	0.0042 U	0.0044 U	0.0044 U	0.26 U	0.25 U	0.24 U	0.23 U
Xylenes	mg/kg	2,800	0.0083 J	355	402	166	0.77 U	0.77 U	0.013 U	0.013 U	0.013 U	0.013 U	7.9	1.4	0.69 J	0.57 J
Semi-Volatile Organic Compounds^																
1,1-Biphenyl	mg/kg	200	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2,4-Dimethylphenol	mg/kg	16,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2-Chloronaphthalene	mg/kg	60,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2-Methylnaphthalene	mg/kg	3,000	4.5	2,950	1,810	790	0.091	0.033	0.13	0.039	0.0082 U	0.0083 U	37.6	0.21	0.12	0.45
2-Methylphenol	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3&4-Methylphenol(m&p Cresol)	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Acenaphthene	mg/kg	45,000	4	24.3	763	305	0.021	0.0043 J	0.033	0.03	0.0082 U	0.0083 U	3.3	0.022	0.015	0.74
Acenaphthylene	mg/kg	45,000	1.5	37.2	61.1	377	0.044	0.0053 J	0.081	0.0088	0.0082 U	0.0083 U	2.4	0.016	0.011	0.054
Acetophenone	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Anthracene	mg/kg	230,000	12.3	1,410	2,670	2,320	0.2	0.032	0.14	0.025	0.0082 U	0.0083 U	104	0.12	0.026	1.4
Benz[a]anthracene	mg/kg	21	13.4	1,740	2,780	1,630	0.19	0.028	0.49	0.083	0.0045 J	0.0083 U	79.9	0.16	0.037	2
Benzaldehyde	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Benzo[a]pyrene	mg/kg	2.1	12.8	1,110	1,790	1,220	0.14	0.02	0.45	0.087	0.0032 J	0.0083 U	53.8	0.1	0.042	1.8
Benzo[b]fluoranthene	mg/kg	21	28	2,910	3,960	2,060	0.26	0.039	0.78	0.14	0.005 J	0.0083 U	121	0.25	0.084	3.1
Benzo[g,h,i]perylene	mg/kg		4.6	122	540	586	0.075	0.011	0.27	0.05	0.0024 J	0.0083 U	9.9	0.062	0.038	0.92
Benzo[k]fluoranthene	mg/kg	210	6.3	2,120	2,910	1,500	0.21	0.032	0.23	0.044	0.0021 J	0.0083 U	11.4	0.19	0.062	0.6
bis(2-chloroethoxy)methane	mg/kg	2,500	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
bis(2-Ethylhexyl)phthalate	mg/kg	160	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Caprolactam	mg/kg	400,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Carbazole	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chrysene	mg/kg	2,100	11.5	1,180	2,070	1,260	0.15	0.023	0.52	0.09	0.003 J	0.0083 U	77.8	0.13	0.031	1.5
Dibenz[a,h]anthracene	mg/kg	2.1	2.4	60.1 J	204	174	0.023	0.0031 J	0.1	0.015	0.0082 U	0.0083 U	3.9	0.021	0.0099	0.33
Fluoranthene	mg/kg	30,000	62.7	4,010	6,570	4,620	0.63	0.084	0.81	0.14	0.0038 J	0.0083 U	289	0.42	0.082	4.9
Fluorene	mg/kg	30,000	12.9	2,180	2,380	1,760	0.2	0.031	0.086	0.031	0.0082 U	0.0083 U	107	0.16	0.07	0.95
Indeno[1,2,3-c,d]pyrene	mg/kg	21	5	161	588	599	0.074	0.01	0.25	0.042	0.0021 J	0.0083 U	11.7	0.063	0.035	0.89
Isophorone	mg/kg	2,400	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Naphthalene	mg/kg	17	32.5	28,700	51,900	7,740	0.77	0.61	0.65	0.14	0.0031 J	0.0091	387	10.8	2.1	3.6
Phenanthrene	mg/kg		98	7,630	9,680	7,510	0.84	0.13	0.51	0.11	0.0015 J	0.0083 U	406	0.66	0.12	5.9
Phenol	mg/kg	250,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Pyrene	mg/kg	23,000	50.3	2,100	4,350	3,480	0.42	0.057	0.59	0.12	0.0038 J	0.0083 U	146	0.24	0.055	3.8
PCBs																
Aroclor 1242	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1248	mg/kg	0.94	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1254	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1260	mg/kg	0.99	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1262	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PCBs (total)	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TPH/Oil and Grease																
Diesel Range Organics	mg/kg	6,200	1,400	10,600	17,700	19,500	13.9	24.8	90.8	55.4	5.4 J	6.1 J	1,490	43.7	38.1	105
Gasoline Range Organics	mg/kg	6,200	10.7 U	5,700	7,160											

**Table 1 - Sub-Parcel A11-1
Summary of Organics Detected in Soil**

Parameter	Units	Sample Date:	8/7/2018	7/27/2018	7/27/2018	7/27/2018	8/8/2018	8/8/2018	8/8/2018	8/8/2018	8/7/2018	8/7/2018	8/7/2018	7/31/2018	8/7/2018	8/7/2018
		PAL	A11-016VV-SB-3	A11-016W-SB-5	A11-016W-SB-10	A11-016W-SB-15	A11-016WW-SB-3	A11-016WW-SB-5	A11-016WW-SB-10	A11-016WW-SB-15	A11-016XX-SB-5	A11-016XX-SB-10	A11-016XX-SB-15	A11-016Y-SB-4	A11-016YY-SB-3	A11-016YY-SB-5
Volatile Organic Compounds																
1,2-Dichlorobenzene	mg/kg	9,300	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
1,2-Dichloroethene (Total)	mg/kg	2,300	0.01 U	0.0082 U	0.0085 U	0.0087 U	1 U	0.45 U	0.52 U	0.56 U	0.0088 U	0.009 U	0.0089 U	0.7 U	0.0083 U	0.012 U
1,3-Dichlorobenzene	mg/kg		0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
1,4-Dichlorobenzene	mg/kg	11	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
2-Butanone (MEK)	mg/kg	190,000	0.01 U	0.0082 U	0.011	0.0087 U	1 U	0.45 U	0.52 U	0.56 U	0.016	0.009 U	0.0079 J	0.7 U	0.0083 U	0.012 U
2-Hexanone	mg/kg	1,300	0.01 U	0.0082 U	0.0085 U	0.0087 U	1 U	0.45 U	0.52 U	0.56 U	0.0088 U	0.009 U	0.0089 U	0.7 U	0.0083 U	0.012 U
Acetone	mg/kg	670,000	0.1	0.15	0.33	0.23	1.9	0.45 U	0.52 U	1.3	0.5 U	0.33	0.63	0.64 J	0.28	0.41
Benzene	mg/kg	5.1	0.0052 U	0.0041 U	0.0042 U	0.0043 U	67.8	32.5	55.4	17	0.0044 U	0.0045 U	0.0045 U	273	0.0042 U	0.0058 U
Carbon disulfide	mg/kg	3,500	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
Chloroform	mg/kg	1.4	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
cis-1,2-Dichloroethene	mg/kg	2,300	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
Cyclohexane	mg/kg	27,000	0.01 U	0.0082 U	0.0085 U	0.0087 U	1 U	0.45 U	0.52 U	0.56 U	0.0088 U	0.009 U	0.0089 U	0.7 U	0.0083 U	0.012 U
Ethylbenzene	mg/kg	25	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.45 J	0.24	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	5.2	0.0042 U	0.0058 U
Isopropylbenzene	mg/kg	9,900	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.66	0.0042 U	0.0058 U
Methyl Acetate	mg/kg	1,200,000	0.052 U	0.037 J	0.024 J	0.022 J	0.73 J	0.067 J	2.6 U	0.11 J	0.014 J	0.011 J	0.013 J	0.7 J	0.0076 J	0.0097 J
Methyl tert-butyl ether (MTBE)	mg/kg	210	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.00088 J	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
Methylene Chloride	mg/kg	1,000	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
Styrene	mg/kg	35,000	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
Tetrachloroethene	mg/kg	100	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.21 J	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
Toluene	mg/kg	47,000	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.14 J	0.12 J	0.28 U	0.0044 U	0.0045 U	0.0045 U	217	0.0042 U	0.0058 U
Trichloroethene	mg/kg	6	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
Vinyl chloride	mg/kg	1.7	0.0052 U	0.0041 U	0.0042 U	0.0043 U	0.5 U	0.23 U	0.26 U	0.28 U	0.0044 U	0.0045 U	0.0045 U	0.35 U	0.0042 U	0.0058 U
Xylenes	mg/kg	2,800	0.016 U	0.012 U	0.013 U	0.013 U	1.4 J	0.56 J	0.78 U	0.85 U	0.013 U	0.014 U	0.013 U	148	0.012 U	0.017 U
Semi-Volatile Organic Compounds[^]																
1,1-Biphenyl	mg/kg	200	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2,4-Dimethylphenol	mg/kg	16,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2-Chloronaphthalene	mg/kg	60,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2-Methylnaphthalene	mg/kg	3,000	0.3	0.0077 U	0.0081 U	0.0084 U	8.8	0.33	0.14	0.044	0.0079 U	0.008 U	0.0082 U	882	0.0075 U	0.0017 J
2-Methylphenol	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3&4-Methylphenol(m&p Cresol)	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Acenaphthene	mg/kg	45,000	0.2	0.0077 U	0.0081 U	0.0084 U	69.5	1	0.034	0.11	0.0011 J	0.008 U	0.0082 U	163	0.0007 J	0.0033 J
Acenaphthylene	mg/kg	45,000	0.11	0.0077 U	0.0081 U	0.0084 U	27.7	0.31	0.0054 J	0.029	0.0079 U	0.008 U	0.0082 U	341	0.0075 U	0.0077 U
Acetophenone	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Anthracene	mg/kg	230,000	0.25	0.0077 U	0.0081 U	0.0084 U	167	4.4	0.046	0.25	0.0079 U	0.008 U	0.0082 U	2,040	0.0075 U	0.0017 J
Benz[a]anthracene	mg/kg	21	0.51	0.0077 U	0.0081 U	0.0084 U	1,080	6.8	0.11	0.43	0.0039 J	0.008 U	0.0082 U	1,180	0.0037 J	0.01
Benzaldehyde	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Benzo[a]pyrene	mg/kg	2.1	0.75	0.0077 U	0.0081 U	0.0084 U	888	5.9	0.075	0.37	0.0032 J	0.008 U	0.0082 U	786	0.0034 J	0.014
Benzo[b]fluoranthene	mg/kg	21	0.98	0.0077 U	0.0081 U	0.0084 U	1,580	10	0.1	0.55	0.0048 J	0.008 U	0.0082 U	1,710	0.0048 J	0.019
Benzo[g,h,i]perylene	mg/kg		0.43	0.0077 U	0.0081 U	0.0084 U	53.4	0.96	0.038	0.24	0.0026 J	0.008 U	0.0082 U	260	0.0025 J	0.011
Benzo[k]fluoranthene	mg/kg	210	0.36	0.0077 U	0.0081 U	0.0084 U	154	3.5	0.04	0.24	0.002 J	0.008 U	0.0082 U	1,250	0.0019 J	0.0082
bis(2-chloroethoxy)methane	mg/kg	2,500	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
bis(2-Ethylhexyl)phthalate	mg/kg	160	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Caprolactam	mg/kg	400,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Carbazole	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Chrysene	mg/kg	2,100	0.48	0.0077 U	0.0081 U	0.0084 U	970	6	0.08	0.39	0.0028 J	0.008 U	0.0082 U	799	0.0024 J	0.011
Dibenz[a,h]anthracene	mg/kg	2.1	0.18	0.0077 U	0.0081 U	0.0084 U	26.1	0.51	0.011	0.079	0.0079 U	0.008 U	0.0082 U	71 J	0.0075 U	0.0035 J
Fluoranthene	mg/kg	30,000	0.78	0.0077 U	0.0013 J	0.0084 U	2,620	13.2	0.35	0.89	0.0033 J	0.008 U	0.0082 U	4,020	0.0025 J	0.012
Fluorene	mg/kg	30,000	0.34	0.0077 U	0.0081 U	0.0084 U	144	3.3	0.074	0.21	0.0079 U	0.008 U	0.0082 U	2,170	0.0075 U	0.00079 J
Indeno[1,2,3-c,d]pyrene	mg/kg	21	0.42	0.0077 U	0.0081 U	0.0084 U	63.6	1.1	0.035	0.22	0.0021 J	0.008 U	0.0082 U	295	0.0022 J	0.0099
Isophorone	mg/kg	2,400	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Naphthalene	mg/kg	17	0.92	0.0077 U	0.0081 U	0.0084 U	34.7	1.5	0.51	0.0036 J	0.0028 J	0.0082 U	9,750	0.0016 J	0.006 J	
Phenanthrene	mg/kg		0.9	0.0014 J	0.0015 J	0.0084 U	2,340	11.5	0.33	0.69	0.0026 J	0.008 U	0.0082 U	7,160	0.0012 J	0.0059 J
Phenol	mg/kg	250,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Pyrene	mg/kg	23,000	0.63	0.0077 U	0.0081 U	0.0084 U	1,830	10.5	0.28	0.69	0.0034 J	0.008 U	0.0082 U	2,730	0.0031 J	0.013
PCBs																
Aroclor 1242	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1248	mg/kg	0.94	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1254	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1260	mg/kg	0.99	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aroclor 1262	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PCBs (total)	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TPH/Oil and Grease																
Diesel Range Organics	mg/kg	6,200	64.5	6.2 J	6.8 J	5.6 J	2,800	376	23.9	43.3	5.7 J	6.6 J	5.1 J	20,000	5.9 J	7 J
Gasoline Range Organics	mg/kg	6,200	8.5 U	9.6 U												

**Table 1 - Sub-Parcel A11-1
Summary of Organics Detected in Soil**

Parameter	Units	PAL	Sample Date:	8/7/2018	8/7/2018	7/31/2018	7/31/2018	7/31/2018	8/10/2018	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	8/15/2016	8/15/2016	8/15/2016	8/15/2016	8/8/2018
			A11-016YY-SB-10	A11-016YY-SB-15	A11-016Z-SB-5	A11-016Z-SB-10	A11-016Z-SB-15	A11-016ZZ-SB-3	A11-018-SB-1	A11-018-SB-8	A11-018-SB-10	A11-020-SB-1	A11-020-SB-7	A11-021-SB-17	A11-022-SB-1	A11-022-SB-4	A11-022-SB-10	A11-024N-SB-2	
Volatile Organic Compounds																			
1,2-Dichlorobenzene	mg/kg	9,300	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.0028 J	0.0057 U	0.005 U	N/A	N/A	0.0044 U
1,2-Dichloroethene (Total)	mg/kg	2,300	0.0096 U	0.0086 U	0.0092 U	0.0096 U	0.0085 U	0.0087 U	0.01 U	0.0068 U	0.01 U	0.017 U	0.0096 U	0.012 U	0.011 U	0.01 U	N/A	N/A	0.0087 U
1,3-Dichlorobenzene	mg/kg		0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.0016 J	0.0057 U	0.005 U	N/A	N/A	0.0044 U
1,4-Dichlorobenzene	mg/kg	11	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.002 J	0.0057 U	0.005 U	N/A	N/A	0.0044 U
2-Butanone (MEK)	mg/kg	190,000	0.0046 J	0.0086 U	0.0092 U	0.0051 J	0.0085 U	0.022	0.01 U	0.0068 U	0.01 U	0.017 U	0.0096 U	0.012 U	0.011 U	0.01 U	N/A	N/A	0.0087 U
2-Hexanone	mg/kg	1,300	0.0096 U	0.0086 U	0.0092 U	0.0096 U	0.0085 U	0.0087 U	0.01 U	0.0068 U	0.01 U	0.017 U	0.0096 U	0.012 U	0.011 U	0.01 U	N/A	N/A	0.0087 U
Acetone	mg/kg	670,000	0.19	0.2	0.2	0.1	0.28	0.57 U	0.03	0.0068 U	0.025	0.033	0.058	0.019	0.011 U	0.017	N/A	N/A	0.17
Benzene	mg/kg	5.1	0.016	0.1	0.0046 U	0.0048 U	0.004 J	0.0079	0.005 U	0.06	2.7	0.0086 U	0.0048 U	12.3	0.0057 U	0.025	N/A	N/A	0.0044 U
Carbon disulfide	mg/kg	3,500	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.013	0.005 U	0.0033 J	0.0062	0.0086 U	0.0048 U	0.0059 U	0.0057 U	0.005 U	N/A	N/A	0.0044 U
Chloroform	mg/kg	1.4	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.0059 U	0.0057 U	0.005 U	N/A	N/A	0.0044 U
cis-1,2-Dichloroethene	mg/kg	2,300	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.0059 U	0.0057 U	0.005 U	N/A	N/A	0.0044 U
Cyclohexane	mg/kg	27,000	0.0096 U	0.0086 U	0.0092 U	0.0096 U	0.0085 U	0.0087 U	0.01 U	0.0068 U	0.01 U	0.017 U	0.0096 U	0.0083 J	0.011 U	0.01 U	N/A	N/A	0.0087 U
Ethylbenzene	mg/kg	25	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0049 J	0.0086 U	0.0048 U	0.096	0.0057 U	0.0017 J	N/A	N/A	0.0044 U
Isopropylbenzene	mg/kg	9,900	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.02	0.0057 U	0.005 U	N/A	N/A	0.0044 U
Methyl Acetate	mg/kg	1,200,000	0.0065 J	0.0015 J	0.1	0.062	0.11	0.013 J	0.05 U	0.034 U	0.051 U	0.086 U	0.048 U	0.059 U	0.057 U	0.05 U	N/A	N/A	0.044 U
Methyl tert-butyl ether (MTBE)	mg/kg	210	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.0059 U	0.0057 U	0.005 U	N/A	N/A	0.0044 U
Methylene Chloride	mg/kg	1,000	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.0059 U	0.0057 U	0.005 U	N/A	N/A	0.0044 U
Styrene	mg/kg	35,000	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0072	0.0086 U	0.0048 U	0.0059 U	0.0057 U	0.005 U	N/A	N/A	0.0044 U
Tetrachloroethene	mg/kg	100	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.0059 U	0.0057 U	0.005 U	N/A	N/A	0.0044 U
Toluene	mg/kg	47,000	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.012	0.11	0.0086 U	0.0048 U	1.9	0.0057 U	0.0082	N/A	N/A	0.0044 U
Trichloroethene	mg/kg	6	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.0059 U	0.0057 U	0.005 U	N/A	N/A	0.0044 U
Vinyl chloride	mg/kg	1.7	0.0048 U	0.0043 U	0.0046 U	0.0048 U	0.0043 U	0.0044 U	0.005 U	0.0034 U	0.0051 U	0.0086 U	0.0048 U	0.0059 U	0.0057 U	0.005 U	N/A	N/A	0.0044 U
Xylenes	mg/kg	2,800	0.014 U	0.013 U	0.014 U	0.014 U	0.013 U	0.013 U	0.0067 J	0.023	0.1	0.026 U	0.014 U	1.6	0.017 U	0.013 J	N/A	N/A	0.013 U
Semi-Volatile Organic Compounds^																			
1,1-Biphenyl	mg/kg	200	N/A	N/A	N/A	N/A	N/A	N/A	0.39	0.55	5.2	0.08 U	0.082 U	0.41	0.074 U	0.083	N/A	N/A	N/A
2,4-Dimethylphenol	mg/kg	16,000	N/A	N/A	N/A	N/A	N/A	N/A	0.26	0.098 U	0.55	0.08 U	0.082 U	0.21	0.074 U	0.021 J	N/A	N/A	N/A
2-Chloronaphthalene	mg/kg	60,000	N/A	N/A	N/A	N/A	N/A	N/A	0.069 U	0.098 U	0.088 U	0.08 U	0.082 U	0.088 U	0.074 U	0.073 U	N/A	N/A	N/A
2-Methylnaphthalene	mg/kg	3,000	0.0086 U	0.0084 U	0.0022 J	0.0085 U	0.0035 J	0.15	4.5	3.3	12.1	0.016	0.0083 U	0.47	0.029 J	0.2	0.0082 U	N/A	0.013
2-Methylphenol	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	0.069 U	0.098 U	0.4	0.08 U	0.082 U	0.13	0.074 U	0.073 U	N/A	N/A	N/A
3&4-Methylphenol(m&p Cresol)	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	0.18	0.061 J	1.5	0.16 U	0.16 U	0.26	0.15 U	0.15 U	N/A	N/A	N/A
Acenaphthene	mg/kg	45,000	0.0015 J	0.0084 U	0.001 J	0.0085 U	0.0084 U	0.061	0.52	0.77	1.3	0.0033 J	0.0083 U	0.3	0.0054 J	0.066 J	0.0016 J	N/A	0.084
Acenaphthylene	mg/kg	45,000	0.0086 U	0.0084 U	0.0037 J	0.0085 U	0.0084 U	1	0.14	2.9	7.1	0.001 J	0.0083 U	0.29	0.12	0.19	0.0015 J	N/A	0.0072 U
Acetophenone	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	0.069 U	0.098 U	0.036 J	0.08 U	0.082 U	0.14	0.074 U	0.034 J	N/A	N/A	N/A
Anthracene	mg/kg	230,000	0.001 J	0.0084 U	0.013	0.0018 J	0.0026 J	0.57	0.49	13.6	5.5	0.007 J	0.0083 U	9.4	0.17	0.49	0.0082 U	N/A	0.056
Benz[a]anthracene	mg/kg	21	0.0058 J	0.0084 U	0.019	0.0024 J	0.002 J	1	0.38	4.4	4.7	0.02 J	0.082 U	2.7	0.9	3	0.0082 U	N/A	0.35
Benzaldehyde	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	0.22	0.098 U	0.088 U	0.08 U	0.082 U	0.12	0.074 U	0.073 U	N/A	N/A	N/A
Benzo[a]pyrene	mg/kg	2.1	0.0073 J	0.0084 U	0.013	0.0008 J	0.00062 J	2.1	0.49	3.3	2.9	0.026	0.0083 U	1.8	0.67	1.3	0.0082 U	N/A	0.67
Benzo[b]fluoranthene	mg/kg	21	0.012	0.0084 U	0.032	0.0015 J	0.0016 J	2.8	1	6.8	5.9	0.052	0.0083 U	3.7	1.5	2.1	0.0082 U	N/A	0.78
Benzo[g,h,i]perylene	mg/kg		0.009	0.0084 U	0.0031 J	0.0085 U	0.0084 U	0.75	0.29	0.88	0.75	0.025	0.0083 U	0.71	0.65	0.8	0.0082 U	N/A	0.53
Benzo[k]fluoranthene	mg/kg	210	0.0047 J	0.0084 U	0.023	0.0085 U	0.0084 U	0.65	0.91	6.1	5.4	0.048	0.0083 U	3.3	1.4	0.7	0.0082 U	N/A	0.31
bis(2-chloroethoxy)methane	mg/kg	2,500	N/A	N/A	N/A	N/A	N/A	N/A	0.069 U	0.098 U	0.088 U	0.08 U	0.082 U	0.088 U	0.074 U	0.073 U	N/A	N/A	N/A
bis(2-Ethylhexyl)phthalate	mg/kg	160	N/A	N/A	N/A	N/A	N/A	N/A	6.2	0.64	1.1	0.023 J	0.082 U	0.026 J	0.026 J	0.11	N/A	N/A	N/A
Caprolactam	mg/kg	400,000	N/A	N/A	N/A	N/A	N/A	N/A	0.17 U	0.25 U	0.22 U	0.2 U	0.21 U	0.22 U	0.19 U	0.18 U	N/A	N/A	N/A
Carbazole	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	0.069 U	5.8	10.6	0.08 U	0.082 U	0.57	0.038 J	0.081	N/A	N/A	N/A
Chrysene	mg/kg	2,100	0.005 J	0.0084 U	0.014	0.0013 J	0.00096 J	0.93	0.53	4.2	4.8	0.023	0.0083 U	3.6	0.62	1.5	0.0082 U	N/A	0.34
Dibenz[a,h]anthracene	mg/kg	2.1	0.0025 J	0.0084 U	0.0078 U	0.0085 U	0.0084 U	0.33	0.071	0.39	0.38	0.0056 J	0.0083 U	0.23	0.17	0.22	0.0082 U	N/A	0.17
Fluoranthene	mg/kg	30,000	0.0057 J	0.0084 U	0.043	0.0062 J	0.0038 J	1.2	0.59	12.4	13.5	0.023	0.0083 U	8.4	0.65	4	0.0082 U	N/A	0.38
Fluorene	mg/kg	30,000	0.0086 U	0.0084 U	0.0081	0.0021 J	0.0039 J	0.11	0.36	6.7	11.7	0.002 J	0.0083 U	2.6	0.014 J	0.21	0.0056 J	N/A	0.021
Indeno[1,2,3-c,d]pyrene	mg/kg	21	0.0071 J	0.0084 U	0.0034 J	0.0085 U	0.0084 U	0.76	0.26	1.1	0.93	0.02	0.0083 U	0.78	0.58	0.77	0.0082 U		

**Table 1 - Sub-Parcel A11-1
Summary of Organics Detected in Soil**

Parameter	Units	PAL	Sample Date:	Not Sampled	8/9/2018	8/9/2018	8/9/2018	8/9/2018	Not Sampled	8/15/2018	Not Sampled	8/15/2018	8/16/2018	8/16/2018	8/17/2018
			A11-024NN-SB	A11-024O-SB-3	A11-024Q-SB-5	A11-024Q-SB-10	A11-024Q-SB-15	A11-024R-SB	A11-024S-SB-4	A11-024T-SB	A11-024U-SB-5	A11-024V-SB-2	A11-024V-SB-4	A11-024W-SB-1.5	
Volatile Organic Compounds															
1,2-Dichlorobenzene	mg/kg	9,300	N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.011 U	N/A	0.0042 U	0.0053 U	0.0041 U	0.0047 U	
1,2-Dichloroethene (Total)	mg/kg	2,300	N/A	0.01 U	0.011 U	6.5 U	5.7 U	N/A	0.022 U	N/A	0.0082 U	0.011 U	0.0082 U	0.0093 U	
1,3-Dichlorobenzene	mg/kg		N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.011 U	N/A	0.0042 U	0.0053 U	0.0041 U	0.0047 U	
1,4-Dichlorobenzene	mg/kg	11	N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.011 U	N/A	0.0042 U	0.0053 U	0.0041 U	0.0047 U	
2-Butanone (MEK)	mg/kg	190,000	N/A	0.027	0.011 U	6.5 U	5.7 U	N/A	0.012 J	N/A	0.0055 J	0.011 U	0.0082 U	0.0093 U	
2-Hexanone	mg/kg	1,300	N/A	0.01 U	0.011 U	6.5 U	5.7 U	N/A	0.022 U	N/A	0.0083 U	0.011 U	0.0082 U	0.0093 U	
Acetone	mg/kg	670,000	N/A	0.64 U	0.25	6.5 U	5.7 U	N/A	0.44	N/A	0.11	0.0076 J	0.0088	0.0093 U	
Benzene	mg/kg	5.1	N/A	0.055	0.0027 J	551	170	N/A	113	N/A	2.8	0.0053 U	0.067	0.0047 U	
Carbon disulfide	mg/kg	3,500	N/A	0.012	0.0054 U	3.3 U	2.8 U	N/A	0.0086 J	N/A	0.0042 U	0.0053 U	0.0034 J	0.0047 U	
Chloroform	mg/kg	1.4	N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.012	N/A	0.0042 U	0.0023 J	0.0041 U	0.0047 U	
cis-1,2-Dichloroethene	mg/kg	2,300	N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.011 U	N/A	0.0041 U	0.0053 U	0.0041 U	0.0047 U	
Cyclohexane	mg/kg	27,000	N/A	0.01 U	0.011 U	6.5 U	5.7 U	N/A	0.022 U	N/A	0.0056 J	0.011 U	0.0082 U	0.0093 U	
Ethylbenzene	mg/kg	25	N/A	0.0052 U	0.0054 U	1.6 J	2.8 U	N/A	0.12	N/A	0.02	0.0053 U	0.012	0.0047 U	
Isopropylbenzene	mg/kg	9,900	N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.014	N/A	0.0018 J	0.0053 U	0.0024 J	0.0047 U	
Methyl Acetate	mg/kg	1,200,000	N/A	0.087	0.054 U	32.5 U	28.3 U	N/A	0.11 U	N/A	0.042 U	0.053 U	0.041 U	0.047 U	
Methyl tert-butyl ether (MTBE)	mg/kg	210	N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.011 U	N/A	0.0042 U	0.0053 U	0.0041 U	0.0047 U	
Methylene Chloride	mg/kg	1,000	N/A	0.0052 U	0.0054 U	3.3 U	2.7 J	N/A	0.29	N/A	0.0042 U	0.0053 U	0.0041 U	0.0047 U	
Styrene	mg/kg	35,000	N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.013	N/A	0.0042 U	0.0053 U	0.0027 J	0.0047 U	
Tetrachloroethene	mg/kg	100	N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.012	N/A	0.0042 U	0.0053 U	0.0041 U	0.0047 U	
Toluene	mg/kg	47,000	N/A	0.0092	0.0054 U	67.8	31.6	N/A	138	N/A	12.8	0.0053 U	5.9	0.0047 U	
Trichloroethene	mg/kg	6	N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.03	N/A	0.0042 U	0.0053 U	0.0041 U	0.0047 U	
Vinyl chloride	mg/kg	1.7	N/A	0.0052 U	0.0054 U	3.3 U	2.8 U	N/A	0.011 U	N/A	0.0042 U	0.0053 U	0.0041 U	0.0047 U	
Xylenes	mg/kg	2,800	N/A	0.0087 J	0.016 U	73.6	23	N/A	54.7	N/A	0.38	0.016 U	0.15	0.014 U	
Semi-Volatile Organic Compounds[^]															
1,1-Biphenyl	mg/kg	200	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2,4-Dimethylphenol	mg/kg	16,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2-Chloronaphthalene	mg/kg	60,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2-Methylnaphthalene	mg/kg	3,000	N/A	3	0.006 J	688	451	N/A	674	N/A	0.89	0.12	496	0.0093	
2-Methylphenol	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
3&4-Methylphenol(m&p Cresol)	mg/kg	41,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Acenaphthene	mg/kg	45,000	N/A	13.3	0.0082 J	320	149	N/A	425	N/A	0.2 J	0.65	192	0.0023 J	
Acenaphthylene	mg/kg	45,000	N/A	56.6	0.0011 J	452	221	N/A	578	N/A	0.11 J	0.016	672	0.0071 U	
Acetophenone	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Anthracene	mg/kg	230,000	N/A	257	0.011	5,270	916	N/A	2,110	N/A	0.39 J	0.19	1,410	0.0024 J	
Benz[a]anthracene	mg/kg	21	N/A	295	0.0066 J	1,620	716	N/A	1,880	N/A	0.75 U	1.6	1,650	0.0099	
Benzaldehyde	mg/kg	120,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Benzo[a]pyrene	mg/kg	2.1	N/A	283	0.0046 J	1,200	535	N/A	1,460	N/A	0.81	3.8	1,380	0.018	
Benzo[b]fluoranthene	mg/kg	21	N/A	859	0.0092	7,640	1,610	N/A	2,570	N/A	2.1	5.4	2,500	0.029	
Benzo[g,h,i]perylene	mg/kg		N/A	8	0.0045 J	121	56.1	N/A	649	N/A	0.45 J	1.3	601	0.018	
Benzo[k]fluoranthene	mg/kg	210	N/A	766	0.0082 J	6,810	1,440	N/A	2,290	N/A	1.9	4.8	2,230	0.026	
bis(2-chloroethoxy)methane	mg/kg	2,500	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
bis(2-Ethylhexyl)phthalate	mg/kg	160	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Caprolactam	mg/kg	400,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Carbazole	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Chrysene	mg/kg	2,100	N/A	299	0.0069 J	1,580	688	N/A	1,620	N/A	4.6	1.6	1,450	0.011	
Dibenz[a,h]anthracene	mg/kg	2.1	N/A	4.6	0.0085 U	42.5	8.3 U	N/A	232	N/A	0.18 J	0.61	208	0.0051 J	
Fluoranthene	mg/kg	30,000	N/A	670	0.024	9,370	3,010	N/A	5,410	N/A	2.6	1.6	4,490	0.016	
Fluorene	mg/kg	30,000	N/A	70.3	0.014	3,930	962	N/A	1,770	N/A	0.33 J	0.12	1,220	0.00083 J	
Indeno[1,2,3-c,d]pyrene	mg/kg	21	N/A	10.6	0.0034 J	136	62.2	N/A	673	N/A	0.4 J	1.5	624	0.015	
Isophorone	mg/kg	2,400	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Naphthalene	mg/kg	17	N/A	11.3	0.014	15,000	7,780	N/A	3,950	N/A	5	0.73	2,530	0.02	
Phenanthrene	mg/kg		N/A	456	0.047	14,400	4,420	N/A	7,130	N/A	2	0.74	4,980	0.015	
Phenol	mg/kg	250,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Pyrene	mg/kg	23,000	N/A	557	0.021	5,940	1,470	N/A	3,840	N/A	3	1.6	3,150	0.013	
PCBs															
Aroclor 1242	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	1 U	N/A	N/A	N/A	N/A	N/A	
Aroclor 1248	mg/kg	0.94	N/A	N/A	N/A	N/A	N/A	N/A	1 U	N/A	N/A	N/A	N/A	N/A	
Aroclor 1254	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	1 U	N/A	N/A	N/A	N/A	N/A	
Aroclor 1260	mg/kg	0.99	N/A	N/A	N/A	N/A	N/A	N/A	1 U	N/A	N/A	N/A	N/A	N/A	
Aroclor 1262	mg/kg		N/A	N/A	N/A	N/A	N/A	N/A	1 U	N/A	N/A	N/A	N/A	N/A	
PCBs (total)	mg/kg	0.97	N/A	N/A	N/A	N/A	N/A	N/A	9.1 U	N/A	N/A	N/A	N/A	N/A	
TPH/Oil and Grease															
Diesel Range Organics	mg/kg	6,200	N/A	2,430	15.1	22,800	16,200	N/A	N/A	N/A	6,110	67.8	5,780	14.4	
Gasoline Range Organics	mg/kg	6,200	N/A	11.6 U	8.3 U	1,500	1,060	N/A	N/A	N/A	89.3	13.1 U	25.4 U	9.4 U	
Oil and Grease	mg/kg	6,200	N/A	20,100	930	21,100	13,300	N/A	N/A	N/A	11,000	414	6,820	311 J	

Detections in bold

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N/A indicates that the parameter was not analyzed for this sample

[^]PAH compounds were analyzed via SIM

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J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

**Table 2 - Sub-Parcel A11-1
Summary of Inorganics Detected in Soil**

		Sample Date:	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016
Parameter	Units	PAL	A11-004-SB-1	A11-004-SB-5	A11-004-SB-10	A11-005-SB-1	A11-005-SB-5	A11-005-SB-10	A11-006-SB-1	A11-006-SB-4
Total Metals										
Aluminum	mg/kg	1,100,000	26,400	13,900	N/A	16,100	19,300	N/A	14,300	23,700
Antimony	mg/kg	470	3.1 U	2.6 U	N/A	3.1 U	2.9 U	N/A	3 U	2.7 U
Arsenic	mg/kg	3	9.2	3.6	4.1	6	6.9	5	8.4	10.5
Barium	mg/kg	220,000	360	87.2	N/A	170	175	N/A	124	262
Beryllium	mg/kg	2,300	2.6	0.73 J	N/A	1.1	1.3	N/A	0.95 J	2
Cadmium	mg/kg	980	1.9	0.35 B	N/A	15.7	0.45 B	N/A	4.9	0.68 B
Chromium	mg/kg	120,000	184	42.6	N/A	848	89.9	N/A	607	85.1
Chromium VI	mg/kg	6.3	0.39 B	0.48 B	N/A	0.6 B	0.29 B	N/A	0.57 B	0.37 B
Cobalt	mg/kg	350	9.7	8	N/A	5.3	6	N/A	7.8	6.1
Copper	mg/kg	47,000	72.4	29.7	N/A	225	31.6	N/A	70.2	76.2
Iron	mg/kg	820,000	35,100	18,100	N/A	111,000	26,900	N/A	196,000	32,500
Lead	mg/kg	800	173	48.7	N/A	257	46.6	N/A	265	121
Manganese	mg/kg	26,000	5,290	637	N/A	17,000	2,430	N/A	15,100	3,840
Mercury	mg/kg	350	0.13	0.045 J	N/A	0.06 J	0.048 J	N/A	0.029 J	0.01 J
Nickel	mg/kg	22,000	42.6	14.7	N/A	26.9	14.9	N/A	49.2	22.5
Selenium	mg/kg	5,800	3.8 J	3.4 U	N/A	4.2 U	3.9 U	N/A	4 U	3.6 U
Silver	mg/kg	5,800	3.1 U	2.6 U	N/A	3.1 U	2.9 U	N/A	3 U	2.7 U
Thallium	mg/kg	12	4.6 J	8.6 U	N/A	22	4.9 J	N/A	23.1	9 U
Vanadium	mg/kg	5,800	334	66.6	N/A	1,750	361	N/A	1,850	202
Zinc	mg/kg	350,000	460	101	N/A	1,140	97	N/A	4,920	158
Other										
Cyanide	mg/kg	150	2.3	0.83	N/A	1.4	0.52 J	N/A	0.84	1.9

Detections in bold

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**Table 2 - Sub-Parcel A11-1
Summary of Inorganics Detected in Soil**

Sample Date:		7/29/2016	7/27/2016	7/27/2016	7/27/2016	7/27/2016	7/27/2016	7/27/2016	7/27/2016	7/28/2016
Parameter	Units	PAL	A11-006-SB-10	A11-007-SB-1	A11-008-SB-1	A11-008-SB-4	A11-009-SB-1	A11-010-SB-1	A11-010-SB-5	A11-011-SB-1
Total Metals										
Aluminum	mg/kg	1,100,000	N/A	24,200	4,800	17,800	12,800	28,400	19,700	14,600
Antimony	mg/kg	470	N/A	2.7 U	2.7 U	2.7 U	2.6 U	2.4 U	2.7 U	2.6 U
Arsenic	mg/kg	3	7.4	2.7	4.3	4.5	3.3	2.1	4.7	2.1 U
Barium	mg/kg	220,000	N/A	205	77.7	96.6	104	506	308	112
Beryllium	mg/kg	2,300	N/A	3.5	0.89 U	0.97	0.92	5.6	1.4	1.4
Cadmium	mg/kg	980	N/A	0.23 J	0.24 J	0.21 J	0.76 J	0.46 J	0.52 J	1.3 U
Chromium	mg/kg	120,000	N/A	6.7	358	46.2	215	141	67.3	14.1
Chromium VI	mg/kg	6.3	N/A	0.36 B	1.2 B	0.33 B	0.31 B	0.31 B	0.34 B	0.31 B
Cobalt	mg/kg	350	N/A	0.98 J	3.6 J	4.9	4.4	2.6 J	6.1	3.7 J
Copper	mg/kg	47,000	N/A	4.6 U	32.9	14.6	16.1	24	32.6	6.1
Iron	mg/kg	820,000	N/A	4,310	78,000	16,400	38,600	70,900	19,600	12,200
Lead	mg/kg	800	N/A	2.6	7.9	37.9	38.4	21.2	131	3.1
Manganese	mg/kg	26,000	N/A	1,030	8,680	901	5,620	6,010	1,600	700
Mercury	mg/kg	350	N/A	0.12 U	0.0051 J	0.11 U	0.1 U	0.0086 J	0.16	0.11 U
Nickel	mg/kg	22,000	N/A	1.7 J	20.7	11.1	12.1	14.3	15.6	7.9 J
Selenium	mg/kg	5,800	N/A	3.7 U	3.6 U	3.6 U	3.5 U	3.2 U	3.6 U	3.4 U
Silver	mg/kg	5,800	N/A	2.7 U	2.7 U	2.7 U	2.6 U	2.4 U	2.7 U	2.6 U
Thallium	mg/kg	12	N/A	9.1 U	9.8	8.9 U	5.7 J	4 J	9 U	8.5 U
Vanadium	mg/kg	5,800	N/A	14.8	808	65.2	426	280	181	22
Zinc	mg/kg	350,000	N/A	9.8	95.8	77.5	158	95	154	26.7
Other										
Cyanide	mg/kg	150	N/A	0.081 J	0.27 J	0.16 J	0.26 J	0.43 J	0.96	0.18 J

Detections in bold

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J: The positive result reported for this analyte is a quantitative estimate.

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**Table 2 - Sub-Parcel A11-1
Summary of Inorganics Detected in Soil**

Sample Date:		7/28/2016	7/28/2016	7/28/2016	7/28/2016	7/28/2016	3/7/2017	3/7/2017	3/7/2017	
Parameter	Units	PAL	A11-011-SB-5	A11-012-SB-1	A11-012-SB-4	A11-013-SB-1	A11-013-SB-7	A11-014-SB-1	A11-014-SB-5	A11-014-SB-10
Total Metals										
Aluminum	mg/kg	1,100,000	14,900	13,800	11,400	34,900	22,000	9,830	4,860	N/A
Antimony	mg/kg	470	2.8 U	2.6 U	2.5 U	2.7 U	2.6 U	1.4 J	3.8 U	N/A
Arsenic	mg/kg	3	4.3	2.2 U	2.4	3.6	2.9	6.2	9	23.1
Barium	mg/kg	220,000	57.9	204	30	534	113	91.1	363	N/A
Beryllium	mg/kg	2,300	0.73 J	0.41 J	0.39 J	4.5	0.73 J	1	1.3 U	N/A
Cadmium	mg/kg	980	1.4 U	2.3	1.3 U	0.39 J	1.3 U	1.4	1.9 U	N/A
Chromium	mg/kg	120,000	28.6	1,190	13.8	43.4	32.6	928	134	N/A
Chromium VI	mg/kg	6.3	0.35 B	0.72 B	0.41 B	0.35 B	0.67 B	0.52 B	0.65 B	N/A
Cobalt	mg/kg	350	14.4	2.8 J	3.5 J	2.3 J	3.1 J	2.3 J	6.3 U	N/A
Copper	mg/kg	47,000	7.4	54.1	7.2	9.9	8.9	86.7	30.3	N/A
Iron	mg/kg	820,000	16,600	101,000	11,600	11,800	7,610	159,000	9,470	N/A
Lead	mg/kg	800	12.8	90	10.5	17.7	19.7	241	291	N/A
Manganese	mg/kg	26,000	168	48,600	92.7	6,660	65.6	30,200	707	N/A
Mercury	mg/kg	350	0.051 J	0.22	0.039 J	0.1 U	0.036 J	0.04 J	0.24	N/A
Nickel	mg/kg	22,000	13.8	22.4	8.5	3.5 J	10.5	26.4	3.8 J	N/A
Selenium	mg/kg	5,800	3.7 U	3.5 U	3.4 U	3.6 U	3.5 U	3 U	3.5 B	N/A
Silver	mg/kg	5,800	2.8 U	2.2 J	2.5 U	2.7 U	2.6 U	2.3 U	3.8 U	N/A
Thallium	mg/kg	12	9.4 U	31.6	8.4 U	9 U	8.8 U	7.6 U	12.5 U	N/A
Vanadium	mg/kg	5,800	32.6	2,240	24.5	290	33.9	2,900	548	N/A
Zinc	mg/kg	350,000	41.1	310	27.4	38.1	24.4	274	88.3	N/A
Other										
Cyanide	mg/kg	150	0.074 J	0.35 J	0.17 J	0.72	0.063 J	1.6	2	N/A

Detections in bold

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**Table 2 - Sub-Parcel A11-1
Summary of Inorganics Detected in Soil**

Sample Date:		3/8/2017	3/8/2017	3/8/2017	7/29/2016	7/29/2016	7/29/2016	7/29/2016	7/29/2016	
Parameter	Units	PAL	A11-016-SB-1	A11-016-SB-4	A11-016-SB-10	A11-018-SB-1	A11-018-SB-8	A11-018-SB-10	A11-020-SB-1	A11-020-SB-7
Total Metals										
Aluminum	mg/kg	1,100,000	11,900	47,200	N/A	14,200	15,900	16,300	14,100	19,100
Antimony	mg/kg	470	1.8 J	3.1 U	N/A	2.6 U	2.2 J	7.6	3 U	3 U
Arsenic	mg/kg	3	5.3	8.8	13.2	5.7	26.5	23.3	2.8	6.9
Barium	mg/kg	220,000	152	541	N/A	275	230	266	181	59.4
Beryllium	mg/kg	2,300	1.1	3.1	N/A	1.5	2	2.3	1.5	0.89 J
Cadmium	mg/kg	980	0.69 J	1 J	N/A	9.9	283	263	0.95 B	1.5 U
Chromium	mg/kg	120,000	824	337	N/A	802	93.6	103	354	31.8
Chromium VI	mg/kg	6.3	0.66 B	0.98 B	N/A	0.33 B	0.3 B	1.3 U	0.42 B	0.35 B
Cobalt	mg/kg	350	2.8 J	5.8	N/A	8.3	21	20.4	5.8	7.8
Copper	mg/kg	47,000	44.5	108	N/A	137	362	375	31	12.8
Iron	mg/kg	820,000	138,000	45,400	N/A	178,000	214,000	190,000	67,000	19,100
Lead	mg/kg	800	205	106	N/A	129	316	414	49.4	14.7
Manganese	mg/kg	26,000	22,200	7,700	N/A	11,900	4,700	4,770	8,140	55.2
Mercury	mg/kg	350	0.097	2.7	N/A	0.0082 J	0.071 J	0.062 J	0.013 J	0.027 J
Nickel	mg/kg	22,000	15.8	26.4	N/A	37.8	78.5	67.9	15.4	15.3
Selenium	mg/kg	5,800	3.2 U	2.8 B	N/A	3.4 J	7	3.4 J	4 U	4 U
Silver	mg/kg	5,800	2.4 U	3.1 U	N/A	0.98 J	6.6	6.5	3 U	3 U
Thallium	mg/kg	12	8.1 U	10.3 U	N/A	20	11.6 U	10.8 U	8.5 J	10.1 U
Vanadium	mg/kg	5,800	2,300	884	N/A	1,580	87.5	96.6	571	46.7
Zinc	mg/kg	350,000	369	237	N/A	262	11,400	11,600	116	49.3
Other										
Cyanide	mg/kg	150	0.77 J	5.9	N/A	0.26 J	1.2	0.49 J	0.27 J	0.75 U

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**Table 2 - Sub-Parcel A11-1
Summary of Inorganics Detected in Soil**

		Sample Date:	7/29/2016	8/15/2016	8/15/2016	8/15/2016	8/15/2016
Parameter	Units	PAL	A11-020-SB-10	A11-021-SB-17	A11-022-SB-1	A11-022-SB-4	A11-022-SB-10
Total Metals							
Aluminum	mg/kg	1,100,000	N/A	15,900	18,500	13,500	N/A
Antimony	mg/kg	470	N/A	3.3 U	2.3 U	2.4 U	N/A
Arsenic	mg/kg	3	10.8	4.9	4.9	2 U	N/A
Barium	mg/kg	220,000	N/A	87.7	142	173	N/A
Beryllium	mg/kg	2,300	N/A	0.86 J	1.9	0.27 J	N/A
Cadmium	mg/kg	980	N/A	0.99 B	0.72 B	0.42 B	N/A
Chromium	mg/kg	120,000	N/A	56.2	217	2,420	N/A
Chromium VI	mg/kg	6.3	N/A	2.9 B	0.49 B	0.54 B	N/A
Cobalt	mg/kg	350	N/A	6.3	7.1	2.8 J	N/A
Copper	mg/kg	47,000	N/A	49.1	278	39.8	N/A
Iron	mg/kg	820,000	N/A	37,000	69,700	75,800	N/A
Lead	mg/kg	800	N/A	45	50.5	100	N/A
Manganese	mg/kg	26,000	N/A	590	5,960	34,100	88.6
Mercury	mg/kg	350	N/A	0.054 J	0.054 J	0.11 U	N/A
Nickel	mg/kg	22,000	N/A	19.1	34.7	11.6	N/A
Selenium	mg/kg	5,800	N/A	3.5 J	1.8 J	3.2 U	N/A
Silver	mg/kg	5,800	N/A	3.3 U	2.3 U	0.81 J	N/A
Thallium	mg/kg	12	N/A	11 U	7.8 U	8 U	N/A
Vanadium	mg/kg	5,800	N/A	94.6	458	9,670	41.4
Zinc	mg/kg	350,000	N/A	185	126	102	N/A
Other							
Cyanide	mg/kg	150	N/A	2.6	0.28 J	0.28 J	N/A

Detections in bold

Values in red indicate an exceedance of the Project Action Limit (PAL)

N/A indicates that the parameter was not analyzed for this sample

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

**Table 3 - Sub-Parcel A11-1
Summary of Organics Detected in Groundwater**

Parameter	Units	PAL	Sample Date:					
			7/25/2018	7/24/2018	7/24/2018	8/14/2018	8/15/2018	8/15/2018
			A11-014-PZ	A11-015-PZ	A11-016-PZ	A11-016EE-PZ	A11-016F-PZ	A11-016J-PZ
Volatile Organic Compounds								
1,1,2,2-Tetrachloroethane	µg/L	0.076	1 U	1 U	1 U	5 U	5 U	5 U
1,1-Dichloroethane	µg/L	2.7	1 U	1 U	1 U	5 U	5 U	5 U
1,2,4-Trichlorobenzene	µg/L	70	1 U	1 U	1 U	5 U	5 U	5 U
1,2-Dibromo-3-chloropropane	µg/L	0.2	5 U	5 U	5 U	25 U	25 U	25 U
1,2-Dichlorobenzene	µg/L	600	1 U	1 U	1 U	5 U	5 U	5 U
1,2-Dichloroethane	µg/L	5	1 U	1 U	1 U	5 U	5 U	5 U
1,2-Dichloroethene (Total)	µg/L	70	2 U	2 U	2 U	8.9 J	10 U	10 U
1,2-Dichloropropane	µg/L	5	1 U	1 U	1 U	5 U	5 U	5 U
1,3-Dichlorobenzene	µg/L		1 U	1 U	1 U	5 U	5 U	5 U
1,4-Dichlorobenzene	µg/L	75	1 U	1 U	1 U	5 U	5 U	5 U
2-Butanone (MEK)	µg/L	5,600	10 U	10 U	10 U	50 U	19.7 J	14.3 J
2-Hexanone	µg/L	38	10 U	10 U	10 U	50 U	50 U	50 U
4-Methyl-2-pentanone (MIBK)	µg/L	1,200	10 U	10 U	0.55 J	50 U	50 U	50 U
Acetone	µg/L	14,000	2.9 J	4.6 J	8.5 J	53.8	85.9	103
Benzene	µg/L	5	96.8	2,680	6,890	35,600	347,000	303,000
Bromodichloromethane	µg/L	0.13	1 U	1 U	1 U	5 U	5 U	5 U
Bromoform	µg/L	3.3	1 U	1 U	1 U	5 U	5 U	5 U
Carbon disulfide	µg/L	810	1 U	1 U	1 U	5 U	40.4	34.2
Carbon tetrachloride	µg/L	5	1 U	1 U	1 U	5 U	20.3	5 U
Chlorobenzene	µg/L	100	1 U	1 U	1 U	5 U	1.2 J	0.93 J
Chloroform	µg/L	0.22	1 U	1 U	1 U	5 U	21.7	8.7
Chloromethane	µg/L	190	1 U	1 U	1 U	5 U	5 U	5 U
cis-1,2-Dichloroethene	µg/L	70	1 U	1 U	1 U	8.9	5 U	5 U
cis-1,3-Dichloropropene	µg/L		1 U	1 U	1 U	5 U	5 U	5 U
Cyclohexane	µg/L	13,000	10 U	10 U	0.73 J	50 U	13.9 J	18.5 J
Ethylbenzene	µg/L	700	1 U	6.6	16.8	37	90.2	107
Isopropylbenzene	µg/L	450	1 U	0.74 J	2.4	3.1 J	7.4	8.7
Methyl Acetate	µg/L	20,000	5 U	5 U	5 U	25 U	25 U	25 U
Methyl tert-butyl ether (MTBE)	µg/L	14	1 U	1 U	1 U	5 U	5 U	5 U
Methylene Chloride	µg/L	5	1 U	2	1 U	5 U	5 U	5 U
Styrene	µg/L	100	1 U	0.48 J	0.7 J	5 U	5 U	5 U
Tetrachloroethene	µg/L	5	1 U	1 U	1 U	5 U	5 U	5 U
Toluene	µg/L	1,000	3.3	7.1	934	1,080	13,400	4,620
Trichloroethene	µg/L	5	1 U	1 U	1 U	5 U	5 U	5 U
Trichlorofluoromethane	µg/L	1,100	1 U	1 U	1 U	5 U	5 U	5 U
Vinyl chloride	µg/L	2	1 U	1 U	1 U	3.3 J	5 U	5 U
Xylenes	µg/L	10,000	3 U	52.5	318	832	2,960	2,320
Semi-Volatile Organic Compounds^								
1,1-Biphenyl	µg/L	0.83	N/A	N/A	N/A	N/A	N/A	N/A
1,4-Dioxane	µg/L	0.46	0.097 U	0.098 U	0.098 U	0.098 U	0.099 U	0.098 U
2,4,6-Trichlorophenol	µg/L	4	N/A	N/A	N/A	N/A	N/A	N/A
2,4-Dichlorophenol	µg/L	46	N/A	N/A	N/A	N/A	N/A	N/A
2,4-Dimethylphenol	µg/L	360	N/A	N/A	N/A	N/A	N/A	N/A
2-Chlorophenol	µg/L	91	N/A	N/A	N/A	N/A	N/A	N/A
2-Methylnaphthalene	µg/L	36	2.2	8.6	55.4	184	278	211
2-Methylphenol	µg/L	930	N/A	N/A	N/A	N/A	N/A	N/A
3&4-Methylphenol(m&p Cresol)	µg/L	930	N/A	N/A	N/A	N/A	N/A	N/A
Acenaphthene	µg/L	530	0.23	23.6	7.1	18	1.8	5.5
Acenaphthylene	µg/L	530	0.14	7.4	14.7	105	0.4	2.2
Acetophenone	µg/L	1,900	N/A	N/A	N/A	N/A	N/A	N/A
Anthracene	µg/L	1,800	0.3	10.7	12.5	63.9	0.94	3.1
Benz[a]anthracene	µg/L	0.03	0.28	6.4	6.3	45.4	0.31	0.1
Benzo[a]pyrene	µg/L	0.2	0.11	5.3	5.1	19	0.19	0.049 J
Benzo[b]fluoranthene	µg/L	0.25	0.18	9	7.2	50.1	0.29	0.091 J
Benzo[g,h,i]perylene	µg/L		0.083 J	2.6	2.4	5.9	0.072 J	0.098 U
Benzo[k]fluoranthene	µg/L	2.5	0.082 J	8	2.1	16.7	0.13	0.047 J
bis(2-chloroethoxy)methane	µg/L	59	N/A	N/A	N/A	N/A	N/A	N/A
bis(2-Ethylhexyl)phthalate	µg/L	6	N/A	N/A	N/A	N/A	N/A	N/A
Caprolactam	µg/L	9,900	N/A	N/A	N/A	N/A	N/A	N/A
Carbazole	µg/L		N/A	N/A	N/A	N/A	N/A	N/A
Chrysene	µg/L	25	0.23	5.2	4.7	15.2	0.27	0.071 J
Dibenz[a,h]anthracene	µg/L	0.025	0.097 U	0.9	0.85	2.8	0.099 U	0.098 U
Diethylphthalate	µg/L	15,000	N/A	N/A	N/A	N/A	N/A	N/A
Di-n-butylphthalate	µg/L	900	N/A	N/A	N/A	N/A	N/A	N/A
Fluoranthene	µg/L	800	1.2	21.1	31.5	178	1.3	2.1
Fluorene	µg/L	290	3.1	43.1	52	176	16.4	13.6
Indeno[1,2,3-c,d]pyrene	µg/L	0.25	0.076 J	2.6	2.5	7	0.072 J	0.098 U
Naphthalene	µg/L	0.17	39.5	640	8,390	14,100	7,600	7,730
N-Nitroso-di-n-propylamine	µg/L	0.011	N/A	N/A	N/A	N/A	N/A	N/A
Phenanthrene	µg/L		3.8	59.9	71.9	311	11.5	116
Phenol	µg/L	5,800	N/A	N/A	N/A	N/A	N/A	N/A
Pyrene	µg/L	120	0.62	14.9	14.7	127	0.88	0.8
TPH/Oil and Grease								
Diesel Range Organics	µg/L	47	1,130	1,710	5,660	16,700	15,800	15,400
Gasoline Range Organics	µg/L	47	1,350	4,540	13,300	74,300	585,000	764,000
Oil and Grease	µg/L	47	4,750 U	1,100 J	1,500 J	4,750 U	4,770 U	4,750 U

Detections in bold

Values in red indicate an exceedance of the Project Action Limit (PAL)

N/A indicates that the parameter was not analyzed for this sample

^PAH compounds were analyzed via SIM

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

**Table 3 - Sub-Parcel A11-1
Summary of Organics Detected in Groundwater**

Parameter	Units	Sample Date:	8/15/2018	8/13/2018	8/13/2018	8/13/2018	8/14/2018	8/14/2018
		PAL	A11-016L-PZ	A11-016LL-PZ	A11-016MM-PZ	A11-016NN-PZ	A11-016QQ-PZ	A11-016R-PZ
Volatile Organic Compounds								
1,1,2,2-Tetrachloroethane	µg/L	0.076	5 U	1 U	1 U	1 U	1 U	1 U
1,1-Dichloroethane	µg/L	2.7	5 U	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	µg/L	70	5 U	1 U	1 U	1 U	1 U	1 U
1,2-Dibromo-3-chloropropane	µg/L	0.2	25 U	5 U	5 U	5 U	5 U	5 U
1,2-Dichlorobenzene	µg/L	600	5 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichloroethane	µg/L	5	5 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichloroethene (Total)	µg/L	70	10 U	2 U	2 U	2 U	2 U	2 U
1,2-Dichloropropane	µg/L	5	5 U	1 U	1 U	1 U	1 U	1 U
1,3-Dichlorobenzene	µg/L		5 U	1 U	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	µg/L	75	5 U	1 U	1 U	1 U	1 U	1 U
2-Butanone (MEK)	µg/L	5,600	50 U	10 U	10 U	10 U	10 U	10 U
2-Hexanone	µg/L	38	50 U	10 U	10 U	10 U	10 U	10 U
4-Methyl-2-pentanone (MIBK)	µg/L	1,200	5.9 J	10 U	10 U	10 U	10 U	10 U
Acetone	µg/L	14,000	51	8.8 J	10.1	36.6	10.3	6.3 J
Benzene	µg/L	5	282,000	1 U	1 U	1 U	1,920	664
Bromodichloromethane	µg/L	0.13	5 U	1 U	1 U	1 U	1 U	1 U
Bromoform	µg/L	3.3	5 U	1 U	1 U	1 U	1 U	1 U
Carbon disulfide	µg/L	810	13.2	1 U	1 U	1 U	0.56 J	0.32 J
Carbon tetrachloride	µg/L	5	5 U	1 U	1 U	1 U	1 U	1 U
Chlorobenzene	µg/L	100	0.8 J	1 U	1 U	1 U	1 U	1 U
Chloroform	µg/L	0.22	15.5	1 U	1 U	1 U	1 U	1 U
Chloromethane	µg/L	190	5 U	1.3	1.5	1.2	1 U	1 U
cis-1,2-Dichloroethene	µg/L	70	5 U	1 U	1 U	1 U	1 U	1 U
cis-1,3-Dichloropropene	µg/L		5 U	1 U	1 U	1 U	1 U	1 U
Cyclohexane	µg/L	13,000	19.9 J	10 U	10 U	10 U	0.64 J	10 U
Ethylbenzene	µg/L	700	102	1 U	1 U	1 U	7.7	0.59 J
Isopropylbenzene	µg/L	450	10.1	1 U	1 U	1 U	1.6	1 U
Methyl Acetate	µg/L	20,000	25 U	5 U	5 U	1.1 J	5 U	5 U
Methyl tert-butyl ether (MTBE)	µg/L	14	5 U	1 U	1 U	1 U	1 U	1 U
Methylene Chloride	µg/L	5	5 U	1 U	1 U	1 U	1 U	1 U
Styrene	µg/L	100	5 U	1 U	1 U	1 U	1 U	1 U
Tetrachloroethene	µg/L	5	5 U	1 U	1 U	1 U	1 U	1 U
Toluene	µg/L	1,000	12,100	1 U	0.36 J	1 U	234	7.1
Trichloroethene	µg/L	5	5 U	1 U	1 U	1 U	1 U	1 U
Trichlorofluoromethane	µg/L	1,100	5 U	1 U	1 U	1 U	1 U	1 U
Vinyl chloride	µg/L	2	5 U	1 U	1 U	1 U	1 U	1 U
Xylenes	µg/L	10,000	2,860	3 U	3 U	3 U	264	7.8
Semi-Volatile Organic Compounds[^]								
1,1-Biphenyl	µg/L	0.83	N/A	N/A	N/A	N/A	N/A	N/A
1,4-Dioxane	µg/L	0.46	0.097 U	0.1 U	0.099 U	0.099 U	0.099 U	0.099 U
2,4,6-Trichlorophenol	µg/L	4	N/A	N/A	N/A	N/A	N/A	N/A
2,4-Dichlorophenol	µg/L	46	N/A	N/A	N/A	N/A	N/A	N/A
2,4-Dimethylphenol	µg/L	360	N/A	N/A	N/A	N/A	N/A	N/A
2-Chlorophenol	µg/L	91	N/A	N/A	N/A	N/A	N/A	N/A
2-Methylnaphthalene	µg/L	36	336	0.053 J	0.035 J	0.099 U	227	0.89
2-Methylphenol	µg/L	930	N/A	N/A	N/A	N/A	N/A	N/A
3&4-Methylphenol(m&p Cresol)	µg/L	930	N/A	N/A	N/A	N/A	N/A	N/A
Acenaphthene	µg/L	530	2.1	0.1 U	0.04 J	0.099 U	6	0.18
Acenaphthylene	µg/L	530	0.65	0.1 U	0.099 U	0.099 U	6.2	0.25
Acetophenone	µg/L	1,900	N/A	N/A	N/A	N/A	N/A	N/A
Anthracene	µg/L	1,800	1.7	0.048 J	0.09 J	0.038 J	5.6	0.9
Benz[a]anthracene	µg/L	0.03	0.7	0.1 U	0.07 J	0.099 U	0.52	1.1
Benzo[a]pyrene	µg/L	0.2	0.52	0.1 U	0.041 J	0.099 U	0.13	0.75
Benzo[b]fluoranthene	µg/L	0.25	0.83	0.1 U	0.071 J	0.099 U	0.22	1.3
Benzo[g,h,i]perylene	µg/L		0.22	0.1 U	0.099 U	0.099 U	0.048 J	0.43
Benzo[k]fluoranthene	µg/L	2.5	0.27	0.1 U	0.023 J	0.099 U	0.09 J	0.49
bis(2-chloroethoxy)methane	µg/L	59	N/A	N/A	N/A	N/A	N/A	N/A
bis(2-Ethylhexyl)phthalate	µg/L	6	N/A	N/A	N/A	N/A	N/A	N/A
Caprolactam	µg/L	9,900	N/A	N/A	N/A	N/A	N/A	N/A
Carbazole	µg/L		N/A	N/A	N/A	N/A	N/A	N/A
Chrysene	µg/L	25	0.66	0.1 U	0.048 J	0.099 U	0.38	0.9
Dibenz[a,h]anthracene	µg/L	0.025	0.073 J	0.1 U	0.099 U	0.099 U	0.099 U	0.14
Diethylphthalate	µg/L	15,000	N/A	N/A	N/A	N/A	N/A	N/A
Di-n-butylphthalate	µg/L	900	N/A	N/A	N/A	N/A	N/A	N/A
Fluoranthene	µg/L	800	3.4	0.081 J	0.21	0.07 J	7.3	3
Fluorene	µg/L	290	4.6	0.042 J	0.081 J	0.099 U	121	1.7
Indeno[1,2,3-c,d]pyrene	µg/L	0.25	0.22	0.1 U	0.099 U	0.099 U	0.049 J	0.42
Naphthalene	µg/L	0.17	8,030	0.6 B	0.56 B	0.18 B	6,050	18.9
N-Nitroso-di-n-propylamine	µg/L	0.011	N/A	N/A	N/A	N/A	N/A	N/A
Phenanthrene	µg/L		14	0.14	0.27	0.092 J	166	2.8
Phenol	µg/L	5,800	N/A	N/A	N/A	N/A	N/A	N/A
Pyrene	µg/L	120	2.2	0.051 J	0.15	0.053 J	4.1	1.8
TPH/Oil and Grease								
Diesel Range Organics	µg/L	47	9,740	338	187	235	3,600	636
Gasoline Range Organics	µg/L	47	470,000	200 U	200 U	200 U	4,600	1,210
Oil and Grease	µg/L	47	4,770 U	4,750 U	4,750 U	4,750 U	4,770 U	4,750 U

Detections in bold

Values in red indicate an exceedance of the Project Action Limit (PAL)

N/A indicates that the parameter was not analyzed for this sample

[^]PAH compounds were analyzed via SIM

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

**Table 3 - Sub-Parcel A11-1
Summary of Organics Detected in Groundwater**

Parameter	Units	Sample Date:							
		PAL	8/13/2018	8/18/2016	7/24/2018	7/25/2018	5/9/2018	7/25/2018	5/9/2018
			A11-016VV-PZ	A11-017-PZ	A11-018-PZ	A11-024-PZ	GL-03 (-3)	GL-03 (-3) Supplemental	GL-08 (-3)
Volatile Organic Compounds									
1,1,2,2-Tetrachloroethane	µg/L	0.076	1.9	1 U	1 U	1 U	1 U	1 U	5 U
1,1-Dichloroethane	µg/L	2.7	3.1	1 U	1 U	1 U	1 U	1 U	5 U
1,2,4-Trichlorobenzene	µg/L	70	0.63 J	1 U	1 U	1 U	1 U	1 U	5 U
1,2-Dibromo-3-chloropropane	µg/L	0.2	1.4 J	5 U	5 U	5 U	1 U	5 U	5 U
1,2-Dichlorobenzene	µg/L	600	0.65 J	1 U	1 U	1 U	1 U	1 U	5 U
1,2-Dichloroethane	µg/L	5	0.87 J	1 U	1 U	1 U	1 U	1 U	5 U
1,2-Dichloroethene (Total)	µg/L	70	2 U	2 U	2 U	2 U	N/A	2 U	N/A
1,2-Dichloropropane	µg/L	5	0.79 J	1 U	1 U	1 U	1 U	1 U	5 U
1,3-Dichlorobenzene	µg/L		1	1 U	1 U	1 U	1 U	1 U	5 U
1,4-Dichlorobenzene	µg/L	75	1.5	1 U	1 U	1 U	1 U	1 U	5 U
2-Butanone (MEK)	µg/L	5,600	3.7 J	10 U	10 U	10 U	5 U	10 U	25 U
2-Hexanone	µg/L	38	1.5 J	10 U	10 U	10 U	5 U	10 U	25 U
4-Methyl-2-pentanone (MIBK)	µg/L	1,200	3 J	10 U	10 U	10 U	5 U	10 U	25 U
Acetone	µg/L	14,000	6.5 J	10 U	15.5	4.9 J	5 J	5.6 J	25.7 J
Benzene	µg/L	5	587	1 U	10.3	53	3.1	4.3	96.1
Bromodichloromethane	µg/L	0.13	2.4	1 U	1 U	1 U	1 U	1 U	5 U
Bromoform	µg/L	3.3	0.83 J	1 U	1 U	1 U	1 U	1 U	5 U
Carbon disulfide	µg/L	810	0.78 J	1 U	1.7	1 U	1 U	1 U	5 U
Carbon tetrachloride	µg/L	5	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Chlorobenzene	µg/L	100	1.4	1 U	1 U	1 U	1 U	1 U	5 U
Chloroform	µg/L	0.22	1 U	1 U	1 U	1 U	1 U	1 U	3.6 J
Chloromethane	µg/L	190	2.1	1 U	1 U	1 U	1 U	1.2	5 U
cis-1,2-Dichloroethene	µg/L	70	1 U	1 U	1 U	1 U	1 U	1 U	5 U
cis-1,3-Dichloropropene	µg/L		0.82 J	1 U	1 U	1 U	1 U	1 U	5 U
Cyclohexane	µg/L	13,000	0.45 J	10 U	10 U	10 U	N/A	10 U	N/A
Ethylbenzene	µg/L	700	3.5	1 U	1 U	1 U	1 U	1 U	3.7 J
Isopropylbenzene	µg/L	450	0.74 J	1 U	1 U	1 U	1 U	1 U	5 U
Methyl Acetate	µg/L	20,000	5 U	5 U	5 U	5 U	N/A	5 U	N/A
Methyl tert-butyl ether (MTBE)	µg/L	14	2.5	1.2	1 U	1 U	1 U	1 U	5 U
Methylene Chloride	µg/L	5	2.9	1 U	1 U	1 U	1 U	1 U	5 U
Styrene	µg/L	100	3	1 U	1 U	1 U	1 U	1 U	5 U
Tetrachloroethene	µg/L	5	2.8	1 U	1 U	1 U	1 U	1 U	5 U
Toluene	µg/L	1,000	8.3	1 U	1.2	0.4 J	1 U	1 U	261
Trichloroethene	µg/L	5	2.2	1 U	1 U	1 U	1 U	1 U	5 U
Trichlorofluoromethane	µg/L	1,100	1.8	1 U	1 U	1 U	1 U	1 U	5 U
Vinyl chloride	µg/L	2	1 U	1 U	1 U	1 U	1 U	1 U	5 U
Xylenes	µg/L	10,000	23.9	3 U	3 U	1.9 J	1 U	3 U	68.9
Semi-Volatile Organic Compounds[^]									
1,1-Biphenyl	µg/L	0.83	N/A	1 U	N/A	N/A	N/A	N/A	N/A
1,4-Dioxane	µg/L	0.46	0.099 U	0.072 J	0.097 U	0.099 U	N/A	0.098 U	N/A
2,4,6-Trichlorophenol	µg/L	4	N/A	1 U	N/A	N/A	1 U	N/A	9.9 U
2,4-Dichlorophenol	µg/L	46	N/A	1 U	N/A	N/A	1 U	N/A	9.9 U
2,4-Dimethylphenol	µg/L	360	N/A	1 U	N/A	N/A	1.5	N/A	79.1
2-Chlorophenol	µg/L	91	N/A	1 U	N/A	N/A	1 U	N/A	9.9 U
2-Methylnaphthalene	µg/L	36	42.2	0.1 U	2	0.099 U	N/A	0.84	N/A
2-Methylphenol	µg/L	930	N/A	1 U	N/A	N/A	1 U	N/A	9.9 U
3&4-Methylphenol(m&p Cresol)	µg/L	930	N/A	2 U	N/A	N/A	0.48 J	N/A	53.9
Acenaphthene	µg/L	530	3.8	0.1 U	0.31	0.19	N/A	1.4	N/A
Acenaphthylene	µg/L	530	4.9	0.1 U	0.82	0.25	N/A	0.16	N/A
Acetophenone	µg/L	1,900	N/A	1 U	N/A	N/A	1 U	N/A	19.1
Anthracene	µg/L	1,800	3.5	0.031 J	0.39	0.31	N/A	0.5	N/A
Benz[a]anthracene	µg/L	0.03	0.52	0.1 U	0.074 J	0.26	N/A	0.064 J	N/A
Benzo[a]pyrene	µg/L	0.2	0.19	0.1 U	0.036 J	0.2	1 U	0.098 U	9.9 U
Benzo[b]fluoranthene	µg/L	0.25	0.26	0.1 U	0.055 J	0.29	N/A	0.098 U	N/A
Benzo[g,h,i]perylene	µg/L		0.064 J	0.1 U	0.097 U	0.11	N/A	0.098 U	N/A
Benzo[k]fluoranthene	µg/L	2.5	0.1	0.1 U	0.025 J	0.12	N/A	0.098 U	N/A
bis(2-chloroethoxy)methane	µg/L	59	N/A	1 U	N/A	N/A	1 U	N/A	1.8 J
bis(2-Ethylhexyl)phthalate	µg/L	6	N/A	0.25 J	N/A	N/A	0.19 J	N/A	9.9 U
Caprolactam	µg/L	9,900	N/A	0.67 J	N/A	N/A	N/A	N/A	N/A
Carbazole	µg/L		N/A	1 U	N/A	N/A	N/A	N/A	N/A
Chrysene	µg/L	25	0.39	0.1 U	0.07 J	0.17	N/A	0.098 U	N/A
Dibenz[a,h]anthracene	µg/L	0.025	0.099 U	0.1 U	0.097 U	0.031 J	N/A	0.098 U	N/A
Diethylphthalate	µg/L	15,000	N/A	0.36 J	N/A	N/A	1 U	N/A	9.9 U
Di-n-butylphthalate	µg/L	900	N/A	1 U	N/A	N/A	1 U	N/A	9.9 U
Fluoranthene	µg/L	800	5.4	0.02 J	0.44	0.87	N/A	0.79	N/A
Fluorene	µg/L	290	15.1	0.1 U	1.5	0.38	N/A	1.7	N/A
Indeno[1,2,3-c,d]pyrene	µg/L	0.25	0.062 J	0.1 U	0.097 U	0.1	N/A	0.098 U	N/A
Naphthalene	µg/L	0.17	736	0.04 B	41.6	0.078 B	4.2	3.5	1,890
N-Nitroso-di-n-propylamine	µg/L	0.011	N/A	1 U	N/A	N/A	N/A	N/A	N/A
Phenanthrene	µg/L		49	0.025 J	1.7	0.2	N/A	1.9	N/A
Phenol	µg/L	5,800	N/A	1 U	N/A	N/A	0.17 J	N/A	1.7 J
Pyrene	µg/L	120	3.5	0.016 J	0.28	0.63	N/A	0.53	N/A
TPH/Oil and Grease									
Diesel Range Organics	µg/L	47	1,850	304	1,270	182	N/A	125	N/A
Gasoline Range Organics	µg/L	47	974	200 U	1,000 U	200 U	N/A	200 U	N/A
Oil and Grease	µg/L	47	4,770 U	3,100 J	4,770 U	4,750 U	N/A	4,770 U	N/A

Detections in bold

Values in red indicate an exceedance of the Project Action Limit (PAL)

N/A indicates that the parameter was not analyzed for this sample

[^]PAH compounds were analyzed via SIM

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

**Table 3 - Sub-Parcel A11-1
Summary of Organics Detected in Groundwater**

Parameter	Units	PAL	Sample Date:						
			5/8/2018	8/19/2016	8/19/2016	7/24/2018	8/22/2016	7/24/2018	8/19/2016
			GL-09 (-2)	LF-02	LF-03S	LF-03S Supplemental	LF-04S	LF-04S Supplemental	LF-05
Volatile Organic Compounds									
1,1,2,2-Tetrachloroethane	µg/L	0.076	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,1-Dichloroethane	µg/L	2.7	1 U	0.45 J	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	µg/L	70	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dibromo-3-chloropropane	µg/L	0.2	1 U	5 U	5 U	5 U	5 U	5 U	5 U
1,2-Dichlorobenzene	µg/L	600	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichloroethane	µg/L	5	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichloroethene (Total)	µg/L	70	N/A	2 U	2 U	2 U	0.52 J	0.68 J	2 U
1,2-Dichloropropane	µg/L	5	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,3-Dichlorobenzene	µg/L		1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	µg/L	75	1 U	1 U	1 U	1 U	1 U	1 U	1 U
2-Butanone (MEK)	µg/L	5,600	11.7	5.1 J	10 U	10 U	10 U	10 U	10 U
2-Hexanone	µg/L	38	5 U	10 U	10 U	10 U	10 U	10 U	10 U
4-Methyl-2-pentanone (MIBK)	µg/L	1,200	5 U	5.6 J	10 U	10 U	10 U	10 U	10 U
Acetone	µg/L	14,000	84.4	32.7	5.7 J	10 U	10 U	5.3 J	10 U
Benzene	µg/L	5	0.86 J	0.87 J	10.5	26	6.1	6.8	1 U
Bromodichloromethane	µg/L	0.13	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Bromoform	µg/L	3.3	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Carbon disulfide	µg/L	810	1 U	7.6	1 U	1 U	1 U	1 U	1 U
Carbon tetrachloride	µg/L	5	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Chlorobenzene	µg/L	100	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Chloroform	µg/L	0.22	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Chloromethane	µg/L	190	1 U	1 U	1 U	1 U	1 U	1 U	1 U
cis-1,2-Dichloroethene	µg/L	70	1 U	1 U	1 U	1 U	0.52 J	0.68 J	1 U
cis-1,3-Dichloropropene	µg/L		1 U	1 U	1 U	1 U	1 U	1 U	1 U
Cyclohexane	µg/L	13,000	N/A	0.19 J	10 U	10 U	10 U	10 U	10 U
Ethylbenzene	µg/L	700	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Isopropylbenzene	µg/L	450	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Methyl Acetate	µg/L	20,000	N/A	5 U	5 U	5 U	5 U	5 U	5 U
Methyl tert-butyl ether (MTBE)	µg/L	14	1 U	1 U	1 U	1 U	0.84 J	0.56 J	1 U
Methylene Chloride	µg/L	5	1 U	1 U	1 U	9.8	1 U	1 U	1 U
Styrene	µg/L	100	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Tetrachloroethene	µg/L	5	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Toluene	µg/L	1,000	2.2	0.58 J	1 U	0.67 J	1 U	1 U	1 U
Trichloroethene	µg/L	5	1 U	1 U	1 U	1 U	0.33 J	0.59 J	1 U
Trichlorofluoromethane	µg/L	1,100	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Vinyl chloride	µg/L	2	1 U	1 U	1 U	1 U	1 U	0.41 J	1 U
Xylenes	µg/L	10,000	1 U	2.9 J	3 U	3 U	3 U	3 U	3 U
Semi-Volatile Organic Compounds[^]									
1,1-Biphenyl	µg/L	0.83	N/A	1 U	0.4 J	N/A	1 U	N/A	1 U
1,4-Dioxane	µg/L	0.46	N/A	8.6	0.14	0.098 U	0.18	0.19	0.1 U
2,4,6-Trichlorophenol	µg/L	4	0.25 J	1 U	1 U	N/A	1 U	N/A	1 U
2,4-Dichlorophenol	µg/L	46	0.26 J	1 U	1 U	N/A	1 U	N/A	1 U
2,4-Dimethylphenol	µg/L	360	0.98 U	31.6	1 U	N/A	0.95 J	N/A	1 U
2-Chlorophenol	µg/L	91	0.98 U	0.62 J	1 U	N/A	1 U	N/A	1 U
2-Methylnaphthalene	µg/L	36	N/A	1.7	1.3	3.6	0.1 U	0.098 U	0.1 U
2-Methylphenol	µg/L	930	8.5	11.1	1 U	N/A	1 U	N/A	1 U
3&4-Methylphenol(m&p Cresol)	µg/L	930	91.6	41.8	2 U	N/A	0.61 J	N/A	2 U
Acenaphthene	µg/L	530	N/A	0.3	0.1 U	0.08 J	0.054 J	0.043 J	0.1 U
Acenaphthylene	µg/L	530	N/A	0.061 J	0.021 J	0.076 J	0.023 J	0.098 U	0.1 U
Acetophenone	µg/L	1,900	0.98 U	1 J	1 U	N/A	0.48 J	N/A	1 U
Anthracene	µg/L	1,800	N/A	3	0.1 U	0.098 U	0.16	0.099	0.1 U
Benz[a]anthracene	µg/L	0.03	N/A	0.1 U	0.1 U	0.098 U	1 U	0.098 U	0.1 U
Benzo[a]pyrene	µg/L	0.2	0.98 U	0.1 U	0.1 U	0.098 U	1 U	0.098 U	0.1 U
Benzo[b]fluoranthene	µg/L	0.25	N/A	0.1 U	0.1 U	0.098 U	1 U	0.098 U	0.1 U
Benzo[g,h,i]perylene	µg/L		N/A	0.1 U	0.1 U	0.098 U	1 U	0.098 U	0.1 U
Benzo[k]fluoranthene	µg/L	2.5	N/A	0.1 U	0.1 U	0.098 U	1 U	0.098 U	0.1 U
bis(2-chloroethoxy)methane	µg/L	59	0.98 U	1 U	1 U	N/A	1 U	N/A	1 U
bis(2-Ethylhexyl)phthalate	µg/L	6	0.98 U	0.43 J	1 U	N/A	1 U	N/A	1 U
Caprolactam	µg/L	9,900	N/A	2.6 U	2.6 U	N/A	2.5 U	N/A	2.6 U
Carbazole	µg/L		N/A	2.2	1 U	N/A	1 U	N/A	1 U
Chrysene	µg/L	25	N/A	0.1 U	0.1 U	0.098 U	1 U	0.098 U	0.1 U
Dibenz[a,h]anthracene	µg/L	0.025	N/A	0.1 U	0.1 U	0.098 U	1 U	0.098 U	0.1 U
Diethylphthalate	µg/L	15,000	0.45 J	1 U	1.6	N/A	2	N/A	0.42 J
Di-n-butylphthalate	µg/L	900	0.23 J	1 U	1 U	N/A	1 U	N/A	1 U
Fluoranthene	µg/L	800	N/A	0.15	0.1 U	0.098 U	0.13	0.088 J	0.1 U
Fluorene	µg/L	290	N/A	0.18	0.11	0.34	0.19	0.12	0.1 U
Indeno[1,2,3-c,d]pyrene	µg/L	0.25	N/A	0.1 U	0.1 U	0.098 U	1 U	0.098 U	0.1 U
Naphthalene	µg/L	0.17	16.4	18.1	2.3	3.4	0.075 B	0.071 B	0.021 J
N-Nitroso-di-n-propylamine	µg/L	0.011	N/A	1.1	1 U	N/A	1 U	N/A	1 U
Phenanthrene	µg/L		N/A	0.62	0.02 J	0.077 J	0.14	0.098 U	0.1 U
Phenol	µg/L	5,800	48.2	178	1 U	N/A	1 U	N/A	1 U
Pyrene	µg/L	120	N/A	0.14	0.1 U	0.098 U	0.045 J	0.098 U	0.1 U
TPH/Oil and Grease									
Diesel Range Organics	µg/L	47	N/A	7,510	585	651	652	379	96.6 J
Gasoline Range Organics	µg/L	47	N/A	200 U	200 U	200 U	200 U	200 U	200 U
Oil and Grease	µg/L	47	N/A	4,820 U	4,800 U	1,800 J	4,770 U	4,750 U	4,800 U

Detections in bold

Values in red indicate an exceedance of the Project Action Limit (PAL)

N/A indicates that the parameter was not analyzed for this sample

[^]PAH compounds were analyzed via SIM

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

**Table 4 - Sub-Parcel A11-1
Summary of Inorganics Detected in Groundwater**

Parameter	Units	PAL	Sample Date:							
			8/18/2016	5/9/2018	5/9/2018	5/8/2018	8/19/2016	8/19/2016	8/22/2016	8/19/2016
			A11-017-PZ	GL-03 (-3)	GL-08 (-3)	GL-09 (-2)	LF-02	LF-03S	LF-04S	LF-05
Total Metals										
Aluminum	µg/L	20,000	N/A	N/A	N/A	N/A	463	558	159	2,640
Antimony	µg/L	6	N/A	0.24 J	2.5 U	0.59	6 U	6 U	6 U	6 U
Arsenic	µg/L	10	N/A	1.6	9.1	20.8	19	26.5	8.4	5 U
Barium	µg/L	2,000	N/A	69	43	35.2	60.7	9.7 J	11.2	25.9
Beryllium	µg/L	4	N/A	0.2 U	1 U	1 U	1 U	2.7	1 U	2.4
Cadmium	µg/L	5	N/A	0.08 U	0.4 U	0.14	3 U	48.4	1.4 J	1.1 J
Calcium	µg/L		N/A	176,000	119,000	232,000	N/A	N/A	N/A	N/A
Chromium	µg/L	100	N/A	0.6	1.1 J	3.8	4.1 J	1.2 J	5 U	1.1 J
Cobalt	µg/L	6	N/A	0.5 U	1.3 J	1.2	3.2 J	91.9	19.8	90.6
Copper	µg/L	1,300	N/A	0.82 B	2.4 B	7.5	5 U	17.8	5 U	16.3
Iron	µg/L	14,000	N/A	40.9 J	680	2,050	625	14,900	67,600	6,950
Lead	µg/L	15	N/A	2.8	1.6	4	25 U	5 U	5 U	9.2
Magnesium	µg/L		N/A	23.2	190	249	N/A	N/A	N/A	N/A
Manganese	µg/L	430	N/A	1.3	14.8	54.7	16.5	368	9,440	1,040
Nickel	µg/L	390	N/A	0.75	8.5	7	14.2	137	33.5	110
Potassium	µg/L		N/A	14,700	60,800	68,000	N/A	N/A	N/A	N/A
Selenium	µg/L	50	N/A	1.8	1.4 J	1.4	8 U	8 U	8 U	8 U
Sodium	µg/L		N/A	14,200	165,000	161,000	N/A	N/A	N/A	N/A
Vanadium	µg/L	86	N/A	12.1	23.4	11.2	43.2	0.55 J	5 U	3.5 J
Zinc	µg/L	6,000	N/A	1.4 J	9.4 J	23.5	5.1 J	246	44.8	161
Dissolved Metals										
Aluminum, Dissolved	µg/L	20,000	328	N/A	N/A	N/A	302	374	86.4	297
Arsenic, Dissolved	µg/L	10	25.5	N/A	N/A	N/A	17.3	29.4	9.6	5 U
Barium, Dissolved	µg/L	2,000	27	N/A	N/A	N/A	57.2	9.5 J	9 J	12.5
Beryllium, Dissolved	µg/L	4	0.66 J	N/A	N/A	N/A	1 U	2.7	0.37 J	1.5
Cadmium, Dissolved	µg/L	5	3 U	N/A	N/A	N/A	3 U	33.5	1.3 J	0.95 J
Chromium, Dissolved	µg/L	100	0.92 J	N/A	N/A	N/A	0.95 J	0.89 J	5 U	5 U
Cobalt, Dissolved	µg/L	6	56.8	N/A	N/A	N/A	25 U	85.1	15.6	85.8
Copper, Dissolved	µg/L	1,300	5 U	N/A	N/A	N/A	5 U	12.1	5 U	3.9 J
Iron, Dissolved	µg/L	14,000	33,600	N/A	N/A	N/A	396	16,200	74,600	6,900
Manganese, Dissolved	µg/L	430	1,390	N/A	N/A	N/A	5 U	351	9,690	1,040
Nickel, Dissolved	µg/L	390	55.7	N/A	N/A	N/A	11.2	127	27.1	106
Selenium, Dissolved	µg/L	50	8 U	N/A	N/A	N/A	7.2 J	8 U	8 U	8 U
Silver, Dissolved	µg/L	94	6 U	N/A	N/A	N/A	6 U	6 U	2.3 J	6 U
Thallium, Dissolved	µg/L	2	10 U	N/A	N/A	N/A	50 U	10 U	3.5 J	10 U
Vanadium, Dissolved	µg/L	86	1.4 J	N/A	N/A	N/A	35.6	5 U	5 U	5 U
Zinc, Dissolved	µg/L	6,000	108	N/A	N/A	N/A	1.3 B	238	34.5	150
Other										
Cyanide	µg/L	200	10 U	N/A	N/A	N/A	148	10 U	16.1	5.2 J

Detections in bold

Values in red indicate an exceedance of the Project Action Limit (PAL)

N/A indicates that the parameter was not analyzed for this sample

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: The positive result reported for this analyte is a quantitative estimate.

B: This analyte was not detected substantially above the level of the associated method blank/preparation or field blank.

**Table 5 - Sub-Parcel A11-1
Summary of Remedial Alternatives Evaluation**

CRITERIA	POTENTIAL REMEDIAL ALTERNATIVES			
	Alternative 1 No Action	Alternative 2 In-Place Containment w/Cap and Vapor Barrier	Alternative 3 In-Situ Treatment by Chemical Stabilization	Alternative 4 Removal and Disposal
Description	- No remedial actions taken.	- In-place containment of materials below concrete slab, asphalt pavement, or soil cap. - Vapor barrier and venting system (passive/active) below floor slab of new building, and utility backfill controls to restrict contaminant migration. - Property use restrictions and long-term monitoring and maintenance to ensure that controls remain effective.	- Injection of chemical reagent using direct push technology or injection wells - Two step process consisting of permeability reduction followed by chemical weathering and NAPL encapsulation.	- Excavate contaminated materials and transport to approved off-site disposal facility. - RCRA-hazardous materials would require treatment and/or disposal at an approved hazardous waste facility.
Long-Term Effectiveness	- Does not mitigate long-term direct contact and vapor inhalation risks.	- Capping will provide for long-term control of direct contact exposures. - Sub-slab vapor barrier and venting system and utility backfill controls will prevent unacceptable inhalation risks. - Long-term monitoring will be conducted to ensure long-term effectiveness.	- Long-term effectiveness is unknown and would have to be estimated from treatability studies. - May increase contaminant mobility.	- Has the potential to be effective in the long-term.
Reduction of Toxicity, Mobility and Volume (TMV) by Treatment	- No reduction in TMV.	- No reduction in TMV by treatment, but treatment of similar materials is commonly regarded as technically impracticable.	- Treatability studies required to confirm potential reduction in TMV. - In-situ chemical treatment has the potential to increase contaminant mobility.	- May involve some reduction of TMV through treatment, but primarily just relocates a relatively large volume of waste.
Short-Term Effectiveness	- Not effective.	- Can be quickly implemented with minimal short-term exposure risks.	- Short-term effectiveness is unknown and would have to be estimated from treatability studies. - May increase short-term exposure risks because of material exposure, handling, and treatment.	- Expected to significantly increase short-term exposure risks because of the exposure, handling, and transportation of a relatively large volume of waste.
Implementability	- Does not present any technical implementation concerns, but not expected to be administratively implementable because it does not address remedial objectives.	- Can be readily implemented with available and proven technologies.	- Requires specialized equipment and materials. - Treatability studies required to confirm technical implementability.	- Potential short-term exposure risks, air emission controls, excavation of materials from below the groundwater table, materials handling and transportation, and other factors present significant implementation concerns.
Community Acceptance	- Not anticipated to be favorable because it does not address remedial objectives.	- Expected to be acceptable because it meets remedial objectives without increasing exposure risks to the community.	- Potentially acceptable depending on results of treatability studies and supplemental studies.	- Transportation of large volumes of waste through any community is generally not favorable. - Fugitive chemical emissions and odors are a potential concern.
State Acceptance	- Not anticipated to be favorable because it does not address remedial objectives.	- Expected to be acceptable because it meets remedial objectives and evaluation criteria.	- Potentially acceptable depending on results of treatability studies and supplemental studies.	- Potentially acceptable, but the relocation of large volumes of waste is generally not favorable.
Estimated Cost	\$0	\$0.3 million	\$3 million	\$6 million
Conclusion	Does not meet cleanup objectives. NOT RECOMMENDED.	Cost-effectively meets cleanup objectives and evaluation criteria. RECOMMENDED.	Questionable effectiveness, implementation concerns, increased short-term exposure risks, and high cost. NOT RECOMMENDED.	Implementation concerns, increased short-term exposure risks, and extremely high cost. NOT RECOMMENDED.

Notes:

- Estimated costs are preliminary order-of-magnitude costs developed for comparison purposes and may not account for all required items and components.

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APPENDIX A

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**TRADEPOINT
ATLANTIC**

1600 Sparrows Point Boulevard
Baltimore, Maryland 21219

September 20, 2018

Maryland Department of Environment
1800 Washington Boulevard
Baltimore MD, 21230

Attention: Ms. Barbara Brown

Subject: Request to Enter Temporary CHS Review
Tradepoint Atlantic Parcel A11-1

Dear Ms. Brown:

The conduct of any environmental assessment and cleanup activities on the Tradepoint Atlantic property, as well as any associated development, is subject to the requirements outlined in the following agreements:

- Administrative Consent Order (ACO) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the Maryland Department of the Environment (effective September 12, 2014); and
- Settlement Agreement and Covenant Not to Sue (SA) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the United States Environmental Protection Agency (effective November 25, 2014).

On September 11, 2014, Tradepoint Atlantic submitted an application to the Maryland Department of the Environment's (Department) Voluntary Cleanup Program (VCP).

In consultation with the Department, Tradepoint Atlantic affirms that it desires to accelerate the assessment, remediation and redevelopment of certain sub-parcels within the larger site due to current market conditions. To that end, the Department and Tradepoint Atlantic agree that the Controlled Hazardous Substance (CHS) Act (Section 7-222 of the Environment Article) and the CHS Response Plan (COMAR 26.14.02) shall serve as the governing statutory and regulatory authority for completing the development activities on Parcel A11-1 and complement the statutory requirements of the Voluntary Cleanup Program (Section 7-501 of the Environment Article). Upon submission of a Site Response and Development Work Plan and completion of the remedial activities for the sub-parcel, the Department shall issue a "No Further Action" letter upon a recordation of an environmental covenant describing any necessary land use controls for the specific sub-parcel. At such time that all the sub-parcels within the larger parcel have completed remedial activities, Tradepoint Atlantic shall submit to the Department a request for issuing a Certificate of Completion (COC) as well as all pertinent information concerning completion of remedial activities conducted on the parcel. Once the VCP has completed its review of the submitted information it shall issue a COC for the entire parcel described in Tradepoint Atlantic's VCP application.



**TRADEPOINT
ATLANTIC**

1600 Sparrows Point Boulevard
Baltimore, Maryland 21219

Alternatively, TradePoint Atlantic or other entity may elect to submit an application for a specific sub-parcel and submit it to the VCP for review and acceptance. If the application is received after the cleanup and redevelopment activities described in this work plan are implemented and a No Further Action letter is issued by the Department pursuant to the CHS Act, the VCP shall prepare a No Further Requirements Determination for the sub-parcel.

If TradePoint Atlantic or other entity has not carried out cleanup and redevelopment activities described in the work plan, the cleanup and redevelopment activities may be conducted under the oversight authority of either the VCP or the CHS Act, so long as those activities comport with this work plan.

Engineering and institutional controls approved as part of this Site Response and Development Work Plan shall be described in documentation submitted to the Department demonstrating that the exposure pathways on the sub-parcel are addressed in a manner that protects public health and the environment. This information shall support TradePoint Atlantic's request for the issuance of a COC for the larger parcel.

Please do not hesitate to contact TradePoint Atlantic for further information.

Thank you,

Peter Haid

Senior Director of Environmental
TRADEPOINT ATLANTIC
1600 Sparrows Point Boulevard
Baltimore, Maryland 21219
T 443.649.5055 C 732.841.7935
phaid@tradepointatlantic.com

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APPENDIX B

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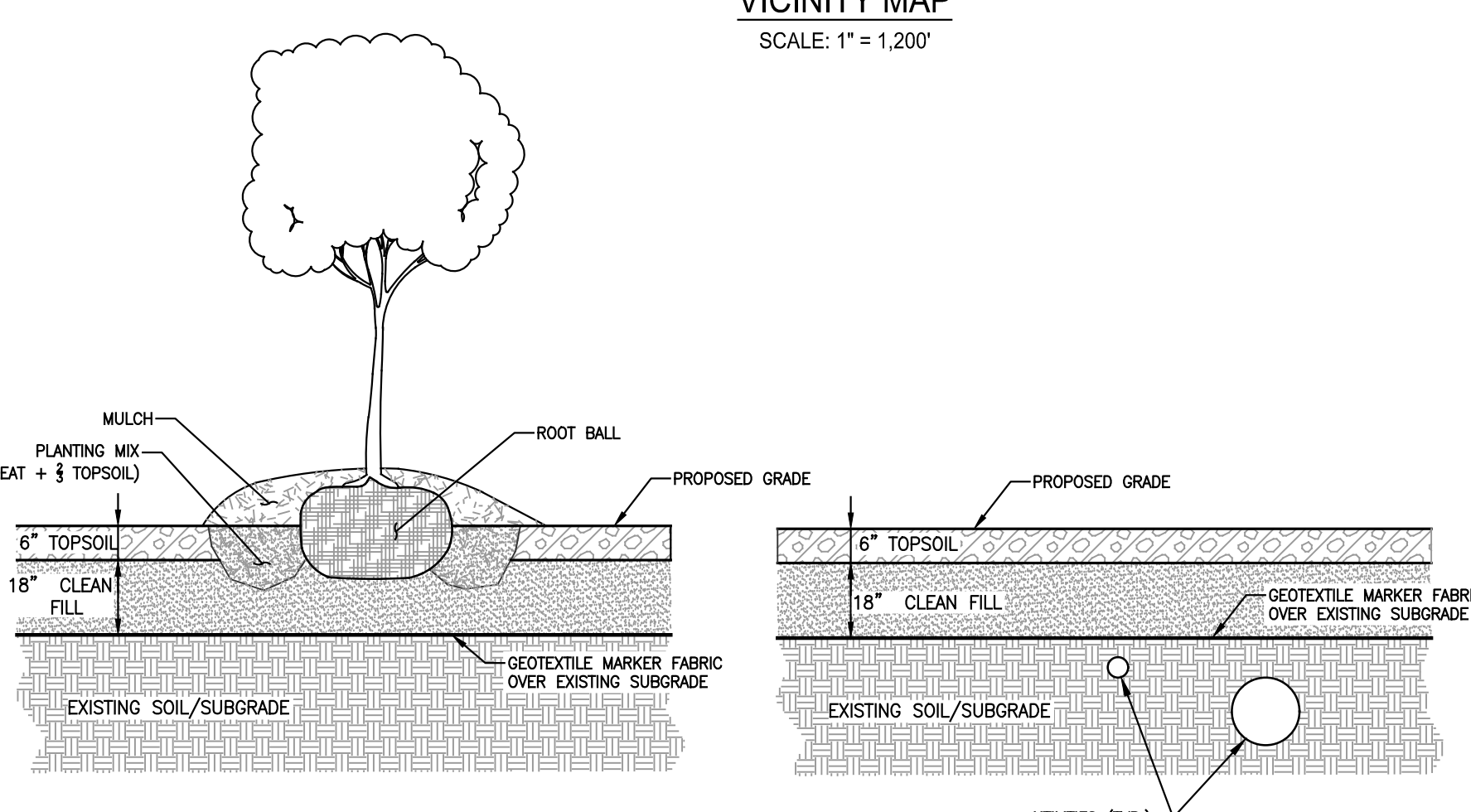
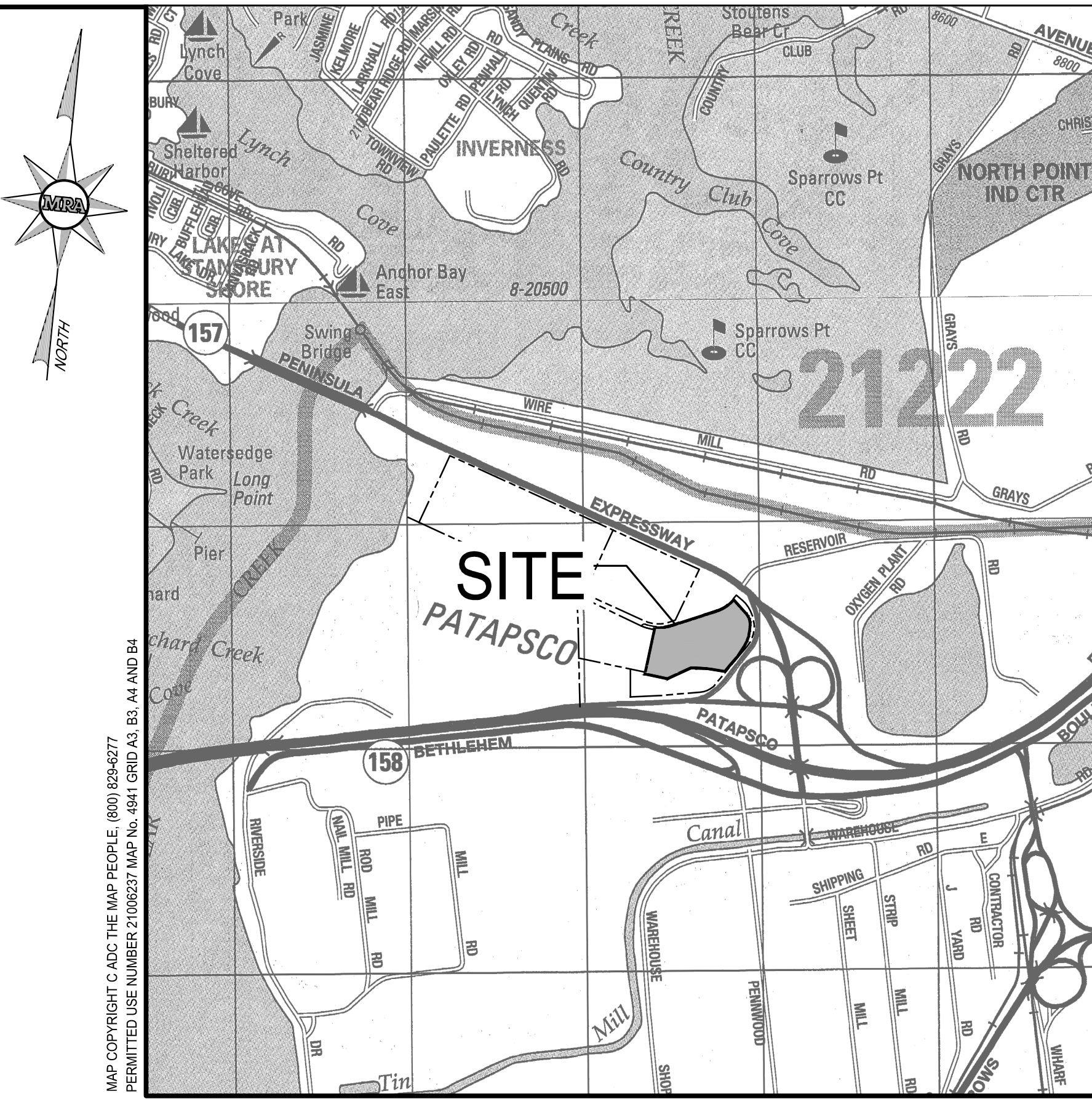
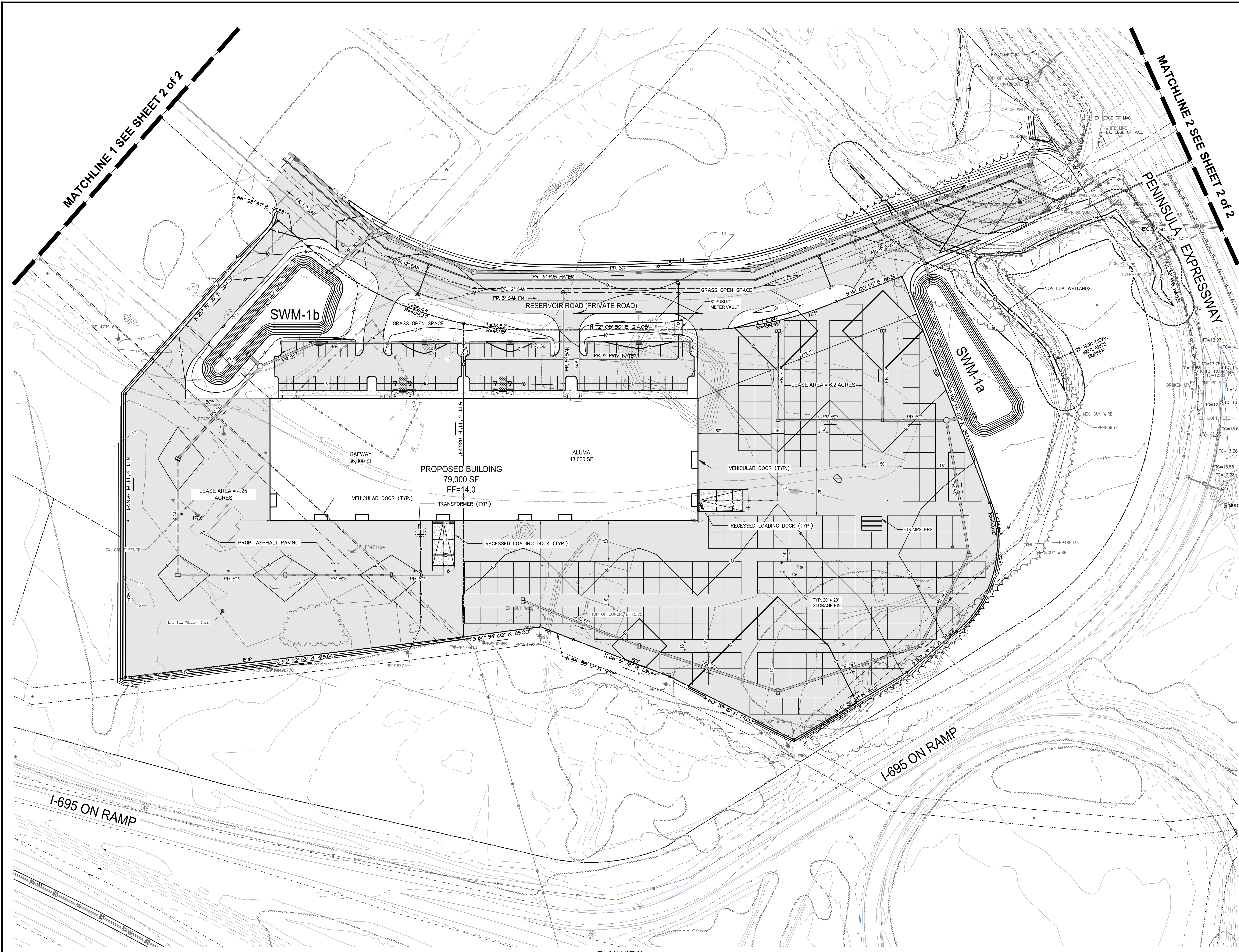
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LANDSCAPED AREA (PLANTING) TYPICAL SECTION
 NOT TO SCALE
 NOTE: SHALLOW ROOTED PLANTS SHALL BE SPECIFIED FOR THIS APPLICATION

LANDSCAPED AREA (SOIL/STONE) TYPICAL SECTION
 NOT TO SCALE

PLAN VIEW
 SCALE: 1" = 50'



SITE ANALYSIS (CONCEPT)

TOTAL AREA OF SITE:	12.2 AC.
AREA WITHIN LIMITS OF DISTURBANCE SHOWN:	605,484 S.F. / 13.9 AC.
AREA TO BE VEGETATIVELY STABILIZED:	61,855 S.F. / 1.42 AC.
AREA TO BE IMPERVIOUS (BLDGs & PAVED AREAS):	471,755 S.F. / 10.83 AC.
ESTIMATED TOTAL CUT (NOT INCLUDING TOPSOIL):	16,627 CY
ESTIMATED TOTAL FILL:	18,809 CY
TOPSOIL:	N/A

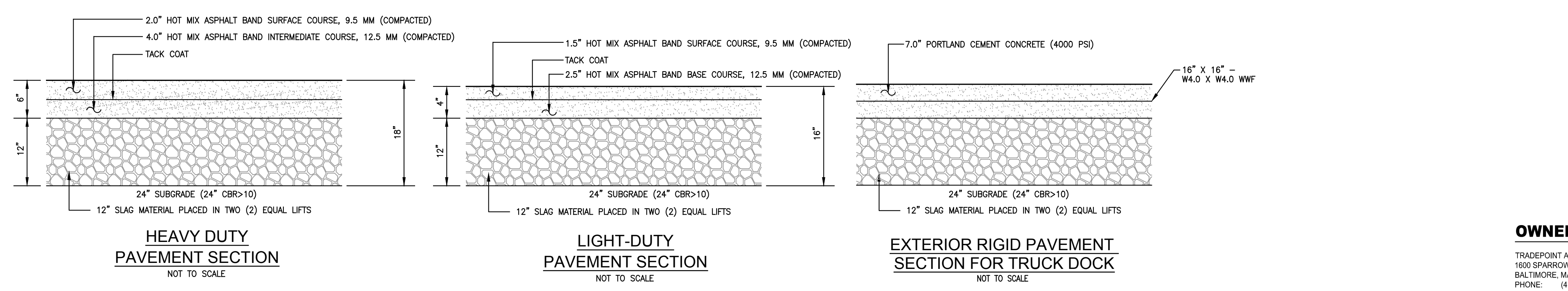
*THE EARTHWORK QUANTITIES SHOWN HEREON ARE FOR INFORMATION PURPOSES ONLY. MRA MAKES NO GUARANTEE OF ACCURACY OF QUANTITIES OR BALANCE OF SITE. THE DEVELOPER AND CONTRACTOR SHALL TAKE FULL RESPONSIBILITY OF ACTUAL EARTHWORK QUANTITIES ENCOUNTERED DURING CONSTRUCTION. *

SITE DATA

TOTAL ONSITE AREA:	12.2 AC
ONSITE DISTURBED AREA (LOD):	13.9 AC
ONSITE EXISTING IMPERVIOUS AREA:	0.96 AC
ONSITE PROPOSED IMPERVIOUS AREA:	10.83 AC
WATERSHED:	BEAR CREEK/PATAPSCO RIVER (PATAPSCO RIVER AREA SUB-BASIN 02-13-09)

LEGEND

PROPOSED	EXISTING
PROPERTY LINE	PROPERTY LINE
LOT LINE	ADJOINING PROPERTY
RIGHT OF WAY	CL OF ROAD
CL OF ROAD/STATIONS	EDGE OF PAVING
EDGE OF PAVING	CURB
CURB	2' CONTOURS
BUILDING SETBACK	10' CONTOURS
EASEMENT	WETLANDS
LIMIT OF DISTURBANCE	25' WETLANDS BUFFER
1' CONTOUR	WATERS OF THE U.S.
5' CONTOUR	STREAM BUFFER
STORM DRAIN	STREAM
WATER	STORM DRAIN
SANITARY SEWER	WATER
CLEARING LIMIT	SANITARY SEWER
SWM POND	WOODS
	FENCE
	100-YEAR FLOOD PLAN



MORRIS & RITCHIE ASSOCIATES, INC.
 ENGINEERS, PLANNERS, SURVEYORS AND LANDSCAPE ARCHITECTS
 3445-A BOX HILL CORPORATE CENTER
 ABINGDON, MARYLAND 21009
 (410) 515-9000
 FAX (410) 515-9001
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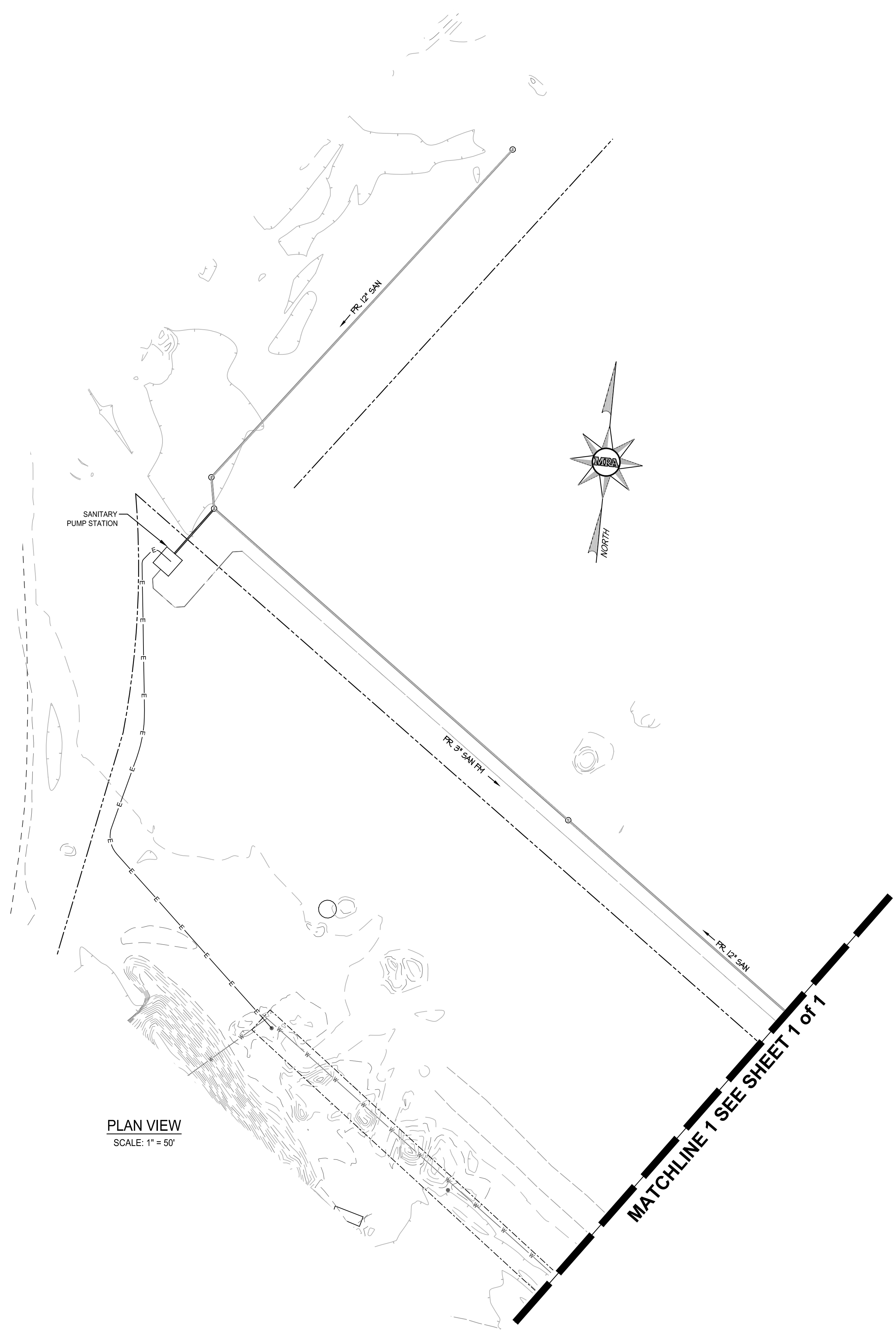
TRADEPOINT ATLANTIC ALUMA/SAFWAY SITE

DEVELOPMENT PLAN

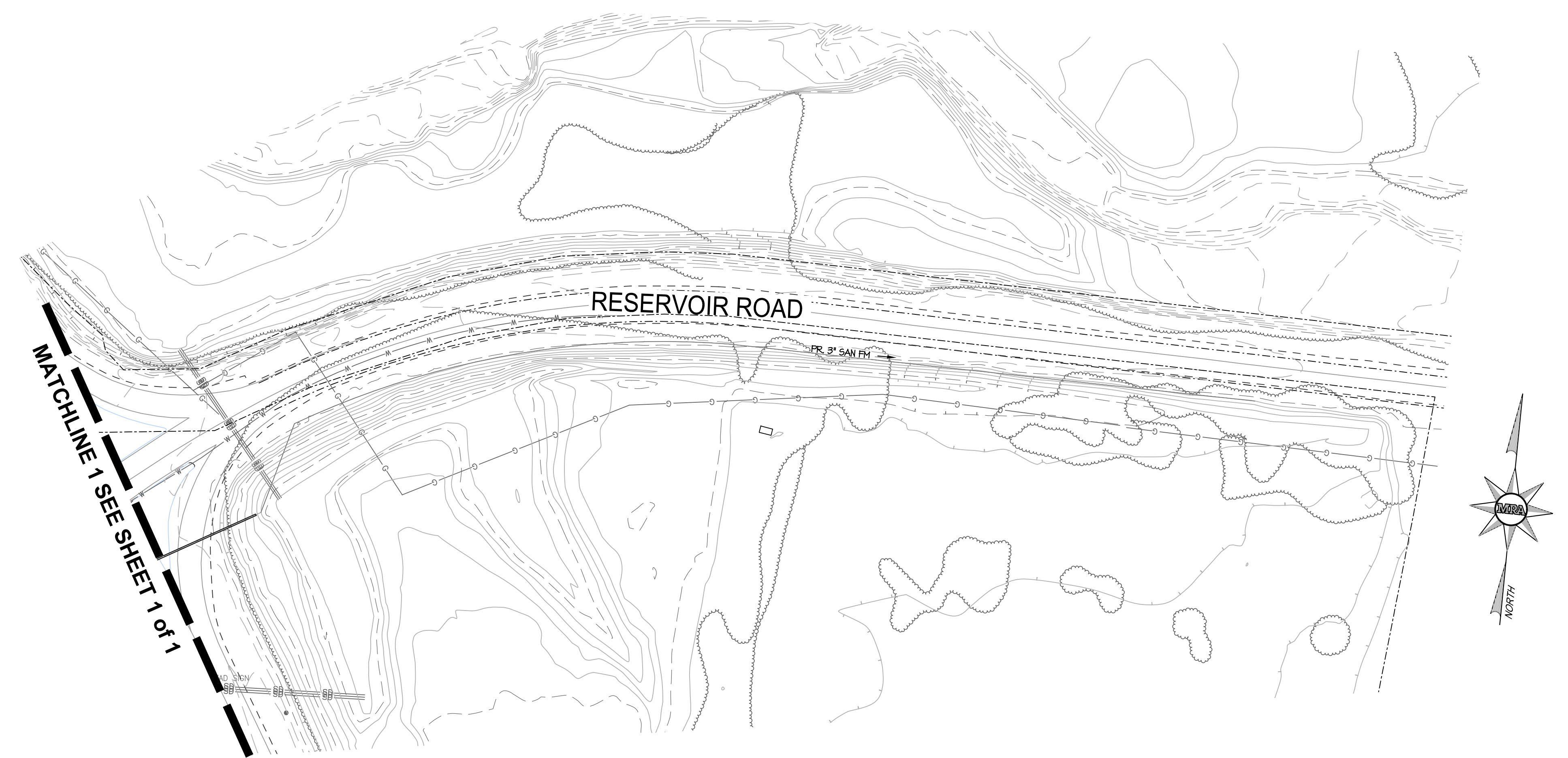
1900 RESERVOIR ROAD
 15TH ELECTION DISTRICT
 7TH COUSINS/MANCOR DISTRICT
 BALTIMORE COUNTY, MARYLAND

DATE	REVISIONS	JOB NO.:	SCALE:
		19979	AS SHOWN
			10/05/2018
			DRAWN BY: CEM
			DESIGN BY: CEM
			REVIEW BY: AGD
			SHEET: 01 OF 02

OWNER / DEVELOPER
 TRADEPOINT ATLANTIC, INC.
 1800 SPARROWS POINT BOULEVARD
 BALTIMORE, MARYLAND 21219
 PHONE: (410) 598-3605
 ATTN: MR. JOHN MARTIN, DIRECTOR DEVELOPMENT



PLAN VIEW
SCALE: 1" = 50'



PLAN VIEW
SCALE: 1" = 50'

LEGEND	
PROPOSED	EXISTING
--- PROPERTY LINE	--- PROPERTY LINE
--- LOT LINE	--- ADJOINING PROPERTY
--- RIGHT OF WAY	--- RIGHT OF WAY
--- CL OF ROAD/STATIONS	--- CL OF ROAD
--- EDGE OF PAWING	--- EDGE OF PAWING
--- CURB	--- CURB
--- BUILDING SETBACK	--- 2' CONTOURS
--- EASEMENT	--- 10' CONTOURS
--- LIMIT OF DISTURBANCE	--- WETLANDS
--- 1' CONTOUR	--- 25' WETLANDS BUFFER
--- 5' CONTOUR	--- WATERS OF THE U.S.
--- STORM DRAIN	--- STREAM BUFFER
--- WATER	--- STREAM
--- SANITARY SEWER	--- STORM DRAIN
--- CLEARING LIMIT	--- WATER
--- SWM POND	--- SANITARY SEWER
	--- WOODS
	--- FENCE
	--- 100-YEAR FLOOD PLAN

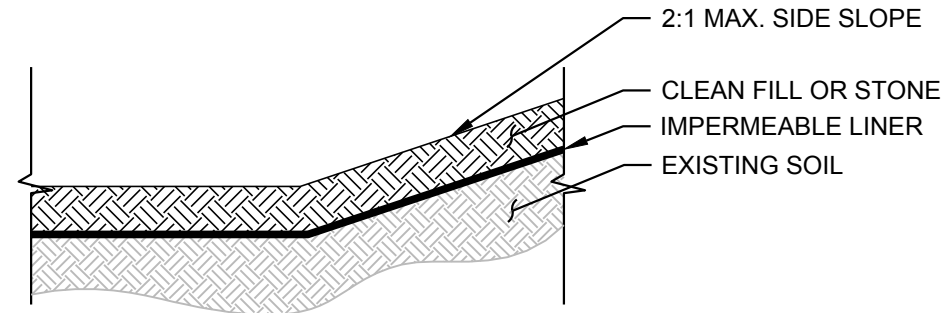
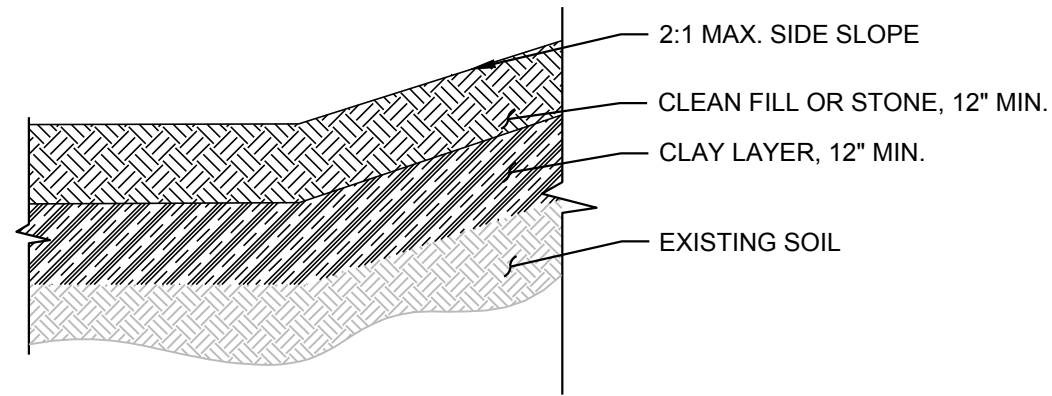


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 1800 SPARRROWS POINT BOULEVARD
 BALTIMORE, MARYLAND 21219
 PHONE: (410) 598-3665
 ATTN: MR. JOHN MARTIN, DIRECTOR DEVELOPMENT

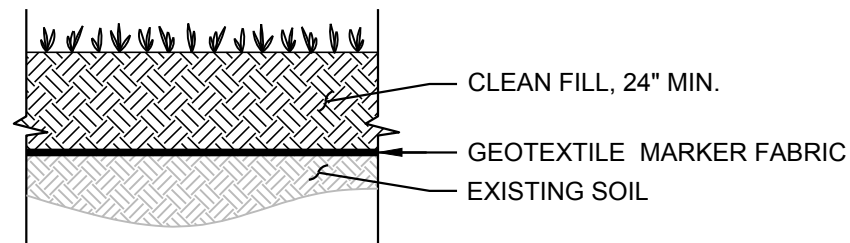
	MORRIS & RITCHIE ASSOCIATES, INC. ENGINEERS, PLANNERS, SURVEYORS AND LANDSCAPE ARCHITECTS 3445-A BOX HILL CORPORATE CENTER ABINGDON, MARYLAND 21009 (410) 515-9000 FAX (410) 515-9001 Copyright 2018 Morris & Ritchie Associates, Inc.																								
	TRADEPOINT ATLANTIC ALUMA/SAFWAY SITE DEVELOPMENT PLAN 1900 RESERVOIR ROAD 15TH ELECTION DISTRICT 7TH COUNCILMANS' DISTRICT BALTIMORE COUNTY, MARYLAND																								
<table border="1"> <thead> <tr> <th>DATE</th> <th>REVISIONS</th> <th>JOB NO.:</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td>19979</td> </tr> <tr> <td></td> <td></td> <td>SCALE: AS SHOWN</td> </tr> <tr> <td></td> <td></td> <td>DATE: 10/05/2018</td> </tr> <tr> <td></td> <td></td> <td>DRAWN BY: CEM</td> </tr> <tr> <td></td> <td></td> <td>DESIGN BY: CEM</td> </tr> <tr> <td></td> <td></td> <td>REVIEW BY: AGD</td> </tr> <tr> <td></td> <td></td> <td>SHEET: 02 OF 02</td> </tr> </tbody> </table>	DATE	REVISIONS	JOB NO.:			19979			SCALE: AS SHOWN			DATE: 10/05/2018			DRAWN BY: CEM			DESIGN BY: CEM			REVIEW BY: AGD			SHEET: 02 OF 02	
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		DESIGN BY: CEM																							
		REVIEW BY: AGD																							
		SHEET: 02 OF 02																							

APPENDIX C

\\armgroup\el\CopData\Projects\EnviroAnalytics Group\160443M EAG_TPA Redevelopment\Drawg\B6\Production\Figure 6b - Environmental Capping Detail.dwg, Plotted: January 31, 2019



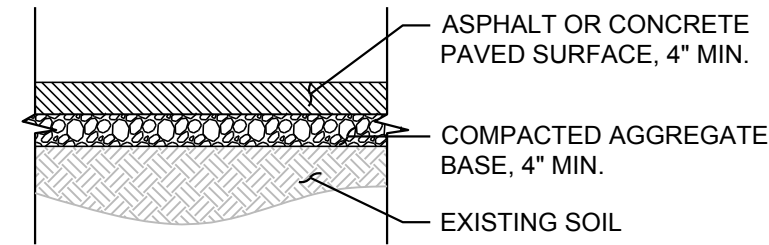
TYPICAL POND SECTIONS
NOT TO SCALE



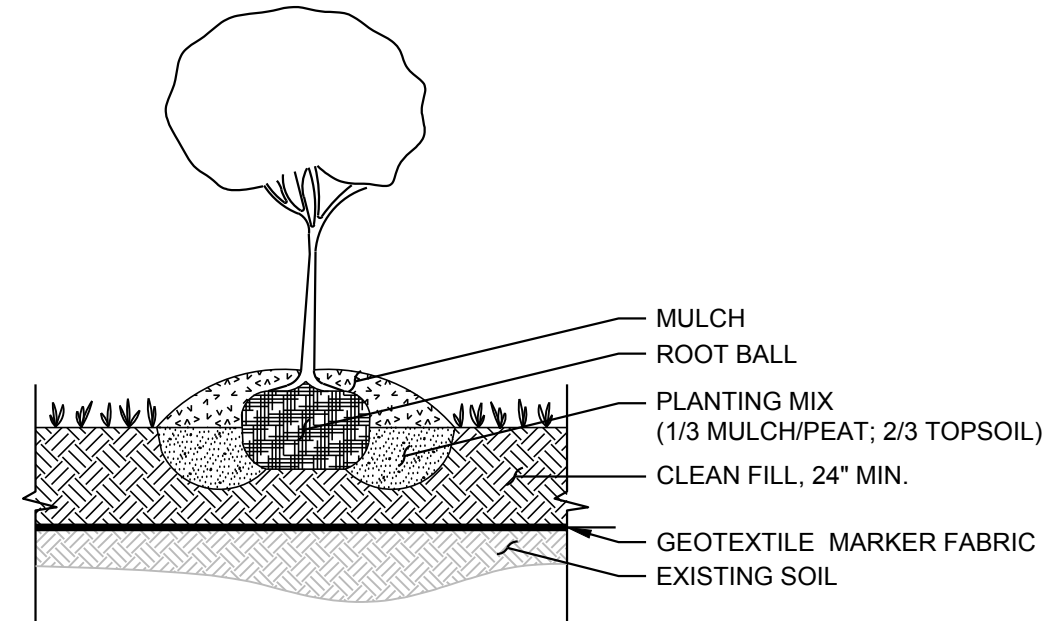
TYPICAL LANDSCAPE SECTION
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GEOTEXTILE MARKER FABRIC SPECIFICATIONS

THE GEOTEXTILE MARKER FABRIC SHALL BE A NONWOVEN PERVIOUS SHEET OF POLYPROPYLENE MATERIAL. ADD STABILIZERS AND/OR INHIBITORS TO THE BASE MATERIAL, AS NEEDED, TO MAKE THE FILAMENTS RESISTANT TO DETERIORATION BY ULTRAVIALET LIGHT, OXIDATION AND HEAT EXPOSURE. REGRIND MATERIAL, WHICH CONSISTS OF EDGE TRIMMINGS AND OTHER SCRAPS THAT HAVE NEVER REACHED THE CONSUMER, MAY BE USED TO PRODUCE THE GEOTEXTILE. POST-CONSUMER RECYCLED MATERIAL MAY BE USED. GEOTEXTILE SHALL BE FORMED INTO A NETWORK SUCH THAT THE FILAMENTS OR YARNS RETAIN DIMENSIONAL STABILITY RELATIVE TO EACH OTHER, INCLUDING THE EDGES. GEOTEXTILES SHALL MEET THE REQUIREMENTS SPECIFIED IN TABLE 1. WHERE APPLICABLE, TABLE 1 PROPERTY VALUES REPRESENT THE MINIMUM AVERAGE ROLL VALUES IN THE WEAKEST PRINCIPAL DIRECTION. VALUES FOR APPARENT OPENING SIZE (AOS) REPRESENT MAXIMUM AVERAGE ROLL VALUES



TYPICAL PAVING SECTION
NOT TO SCALE



TYPICAL PLANTING SECTION
NOT TO SCALE

TABLE 1		WOVEN SLIT FILM GEOTEXTILE		WOVEN MONOFILAMENT GEOTEXTILE		NONWOVEN GEOTEXTILE	
		MINIMUM AVERAGE ROLL VALUE ¹					
PROPERTY	TEST METHOD	MD	CD	MD	CD	MD	CD
Grab Tensile Strength	ASTM D-4632	200 lb	200 lb	370 lb	250 lb	200 lb	200 lb
Grab Tensile Elongation	ASTM D-4632	15%	10%	15%	15%	50%	50%
Trapezoidal Tear Strength	ASTM D-4533	75 lb	75 lb	100 lb	60 lb	80 lb	80 lb
Puncture Strength	ASTM D-6241	450 lb		900 lb		450 lb	
Apparent Opening Size ²	ASTM D-4751	U.S. Sieve 30 (0.59 mm)		U.S. Sieve 70 (0.21 mm)		U.S. Sieve 70 (0.21 mm)	
Permittivity	ASTM D-4491	0.05 sec ⁻¹		0.28 sec ⁻¹		1.1 sec ⁻¹	
Ultraviolet Resistance Retained at 500 hours	ASTM D-4355	70% strength		70% strength		70% strength	

¹ All numeric values except apparent opening size (AOS) represent minimum average roll values (MARV). MARV is calculated as the typical minus two standard deviations. MD is machine direction; CD is cross direction.

² Values for AOS represent the average maximum opening.



scale	N/A
date	1/31/2019
project no.	160443M

designed	RJC
checked	TNP
drawn	RJC

CAPPING SECTION DETAILS
SPARROWS POINT
BALT. COUNTY, MARYLAND

Appendix
C

APPENDIX D



STEGO® WRAP VAPOR BARRIER

A STEGO INDUSTRIES, LLC INNOVATION | VAPOR RETARDERS 07 26 00, 03 30 00 | VERSION: JULY 20, 2018

1. PRODUCT NAME

STEGO WRAP VAPOR BARRIER

2. MANUFACTURER

Stego Industries, LLC
 216 Avenida Fabricante, Suite 101
 San Clemente, CA 92672
 Sales, Technical Assistance
 Ph: (877) 464-7834
 contact@stegoindustries.com
 www.stegoindustries.com



3. PRODUCT DESCRIPTION

USES: Stego Wrap Vapor Barrier is used as a below-slab vapor barrier.

COMPOSITION: Stego Wrap Vapor Barrier is a multi-layer plastic extrusion manufactured with only high grade prime, virgin, polyolefin resins.

ENVIRONMENTAL FACTORS: Stego Wrap Vapor Barrier can be used in systems for the control of soil gases (radon, methane), soil poisons (oil by-products) and sulfates.

4. TECHNICAL DATA

TABLE 1: PHYSICAL PROPERTIES OF STEGO WRAP VAPOR BARRIER

PROPERTY	TEST	RESULTS
Under Slab Vapor Retarders	ASTM E1745 Class A, B & C- Standard Specification for Water Vapor Retarders Used in Contact with Soil or Granular Fill under Concrete Slabs	Exceeds Class A, B & C
Water Vapor Permeance	ASTM F1249 – Test Method for Water Vapor Transmission Rate Through Plastic Film and Sheeting Using a Modulated Infrared Sensor	0.0086 perms
Permeance After Conditioning [ASTM E1745 Sections 7.1.2 - 7.1.5]	ASTM E154 Section 8, F1249 – Permeance after wetting, drying, and soaking ASTM E154 Section 11, F1249 – Permeance after heat conditioning ASTM E154 Section 12, F1249 – Permeance after low temperature conditioning ASTM E154 Section 13, F1249 – Permeance after soil organism exposure	0.0098 perms 0.0091 perms 0.0097 perms 0.0095 perms
Methane Transmission Rate	ASTM D1434 – Standard Test Method for Determining Gas Permeability Characteristics of Plastic Film and Sheeting	192.8 GTR* (mL(STP)/m ² *day)
Radon Diffusion Coefficient	K124/02/95	8.8 x 10 ⁻¹² m ² /second
Puncture Resistance	ASTM D1709 – Test Method for Impact Resistance of Plastic Film by Free-Falling Dart Method	2,266 grams
Tensile Strength	ASTM D882 – Test Method for Tensile Properties of Thin Plastic Sheeting	70.6 lbf/in
Thickness		15 mil
Roll Dimensions		width x length: 14' x 140' area: 1,960 ft ²
Roll Weight		140 lb

Note: perm unit = grains/(ft²*hr*in-Hg)

*GTR = Gas Transmission Rate

Continued...

Note – legal notice on page 2.

STEGO® WRAP VAPOR BARRIER

A STEGO INDUSTRIES, LLC INNOVATION | VAPOR RETARDERS 07 26 00, 03 30 00 | VERSION: JULY 20, 2018

5. INSTALLATION

UNDER SLAB: Unroll Stego Wrap Vapor Barrier over an aggregate, sand or tamped earth base. Overlap all seams a minimum of 6 inches and tape using Stego® Tape or Stego® Crete Claw® Tape. All penetrations must be sealed using a combination of Stego Wrap and Stego Accessories.

For additional information, please refer to Stego's complete installation instructions.

6. AVAILABILITY & COST

Stego Wrap Vapor Barrier is available through our network of building supply distributors. For current cost information, contact your local Stego distributor or Stego Industries' Sales Representative.

7. WARRANTY

Stego Industries, LLC believes to the best of its knowledge, that specifications and recommendations herein are accurate and reliable. However, since site conditions are not within its control, Stego Industries does not guarantee results from the use of the information provided herein. Stego Industries, LLC does offer a limited warranty on Stego Wrap. Please see www.stegoindustries.com/legal.

8. MAINTENANCE

None required.

9. TECHNICAL SERVICES

Technical advice, custom CAD drawings, and additional information can be obtained by contacting Stego Industries or by visiting the website.

Email: contact@stegoindustries.com

Contact Number: (877) 464-7834

Website: www.stegoindustries.com

10. FILING SYSTEMS

- www.stegoindustries.com



(877) 464-7834 | www.stegoindustries.com

DATA SHEETS ARE SUBJECT TO CHANGE. FOR MOST CURRENT VERSION, VISIT WWW.STEGOINDUSTRIES.COM

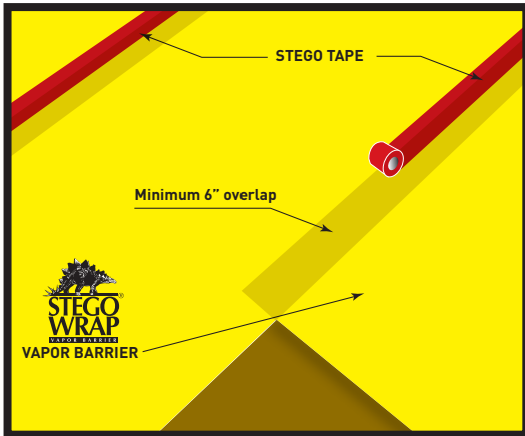


STEGO® WRAP VAPOR BARRIER/RETARDER INSTALLATION INSTRUCTIONS

IMPORTANT: Please read these installation instructions completely, prior to beginning any Stego Wrap installation. The following installation instructions are based on ASTM E1643 - Standard Practice for Selection, Design, Installation, and Inspection of Water Vapor Retarders Used in Contact with Earth or Granular Fill Under Concrete Slabs. If project specifications call for compliance with ASTM E1643, then be sure to review the specific installation sections outlined in the standard along with the techniques referenced in these instructions.

UNDER-SLAB INSTRUCTIONS:

FIGURE 1: UNDER-SLAB INSTALLATION



1. Stego Wrap can be installed over an aggregate, sand, or tamped earth base. It is not necessary to have a cushion layer or sand base, as Stego Wrap is tough enough to withstand rugged construction environments.
2. Unroll Stego Wrap over the area where the slab is to be placed. Stego Wrap should completely cover the concrete placement area. All joints/seams both lateral and butt should be overlapped a minimum of 6" and taped using Stego® Tape.

NOTE: The area of adhesion should be free from dust, dirt, moisture, and frost to allow maximum adhesion of the pressure-sensitive tape.

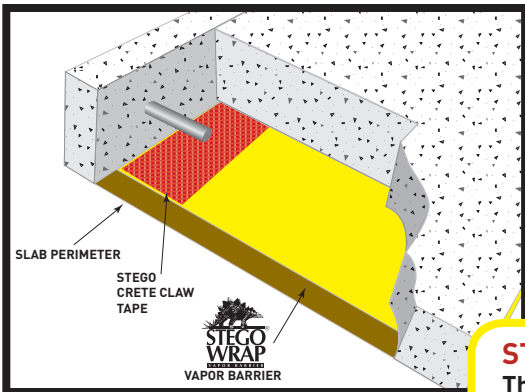
3. ASTM E1643 requires sealing the perimeter of the slab. *Extend vapor retarder over footings and seal to foundation wall, grade beam, or slab at an elevation consistent with the top of the slab or terminate at impediments such as waterstops or dowels.* Consult the structural engineer of record before proceeding.

SEAL TO SLAB AT PERIMETER:*

NOTE: Clean the surface of Stego Wrap to ensure that the area of adhesion is free from dust, dirt, moisture, and frost to allow maximum adhesion of the pressure-sensitive adhesive.

- a. Install Stego® Crete Claw® Tape on the entire perimeter edge of Stego Wrap.
- b. Prior to the placement of concrete, ensure that the top of Stego Crete Claw Tape is free of dirt, debris, or mud to maximize the bond to the concrete.

FIGURE 2a: SEAL TO SLAB AT PERIMETER

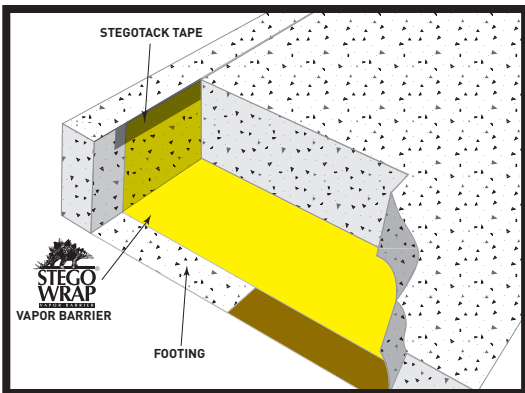


STEGO LABOR SAVER!

This method not only complies with ASTM E1643, but it also:

- reduces labor compared to other perimeter sealing techniques.
- can be used even without an existing wall or footing, unlike alternatives.

FIGURE 2b: SEAL TO PERIMETER WALL



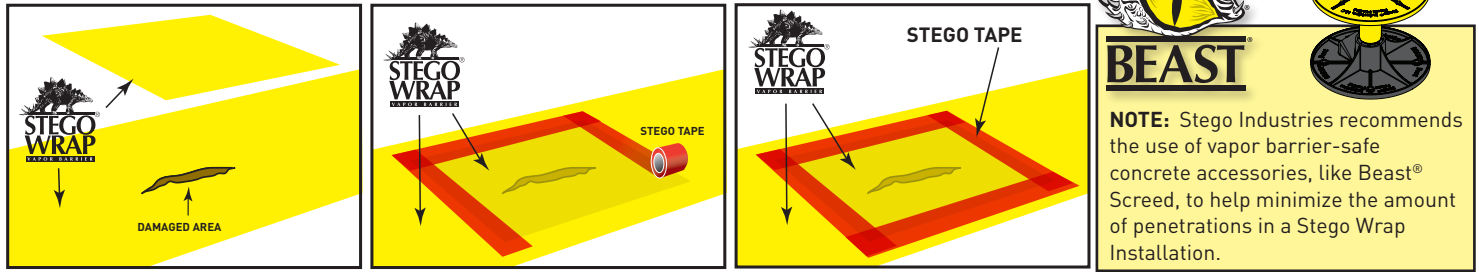
OR SEAL TO PERIMETER WALL WITH STEGOTACK® TAPE:*

- a. Make sure area of adhesion is free of dust, dirt, debris, moisture, and frost to allow maximum adhesion.
- b. Remove release liner on one side and stick to desired surface.
- c. When ready to apply Stego Wrap, remove the exposed release liner and press Stego Wrap firmly against StegoTack Tape to secure.

* If ASTM E1643 is specified, consult with project architect and structural engineer to determine which perimeter seal technique should be employed for the project.

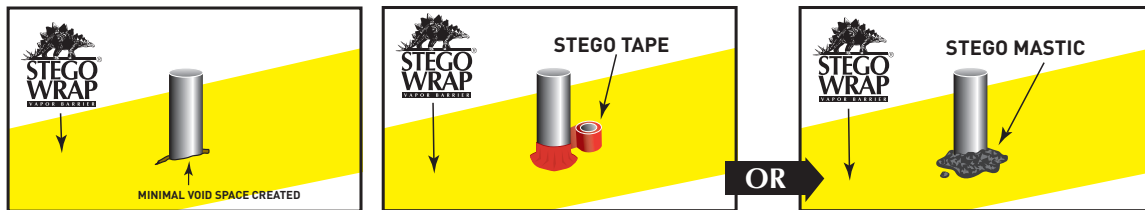
- In the event that Stego Wrap is damaged during or after installation, repairs must be made. For holes, cut a piece of Stego Wrap to a size and shape that covers any damage by a minimum overlap of 6" in all directions. Clean all adhesion areas of dust, dirt, moisture, and frost. Tape down all edges using Stego Tape (See Figure 3).

FIGURE 3: SEALING DAMAGED AREAS



- IMPORTANT: ALL PENETRATIONS MUST BE SEALED.** All pipe, ducting, rebar, wire penetrations and block outs should be sealed using Stego Wrap, Stego Tape and/or Stego Mastic (See Figure 4a). If penetrations are encased in other materials, such as expansive materials like foam, unless otherwise specified, Stego Wrap should be sealed to the underlying penetration directly.

FIGURE 4a: PIPE PENETRATION SEALING



STEGO WRAP PIPE PENETRATION REPAIR DETAIL:

- 1: Install Stego Wrap around pipe penetrations by slitting/cutting material as needed. Try to minimize the void space created.
- 2: If Stego Wrap is close to pipe and void space is minimized then seal around pipe penetration with Stego Tape and/or Stego Mastic. (See Figure 4a)
- 3: If detail patch is needed to minimize void space around penetration, then cut a detail patch to a size and shape that creates a 6" overlap on all edges around the void space at the base of the pipe. Stego Pre-Cut Pipe Boots are also available to speed up the installation.
- 4: Cut an "X" the size of the pipe diameter in the center of the pipe boot and slide tightly over pipe.
- 5: Tape down all sides of the pipe boot with Stego Tape.
- 6: Seal around the base of the pipe using Stego Tape and/or Stego Mastic. (See Figure 4b)

FIGURE 4b: DETAIL PATCH FOR PIPE PENETRATION SEALING

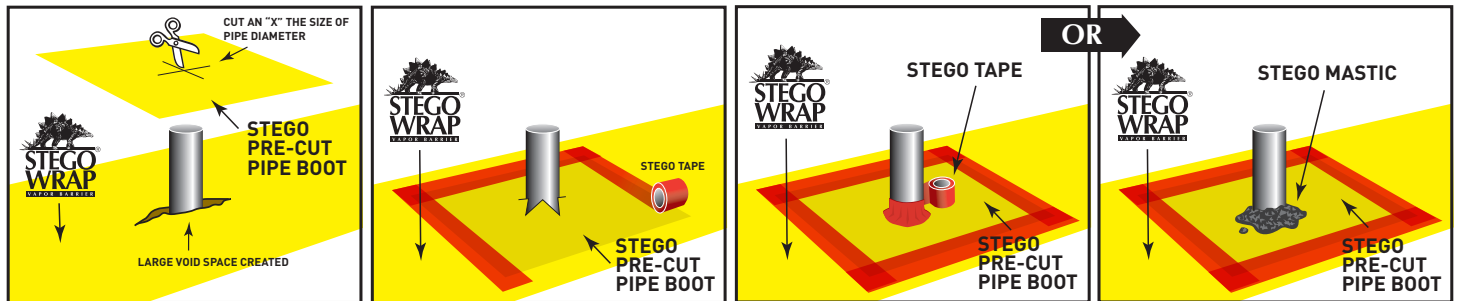
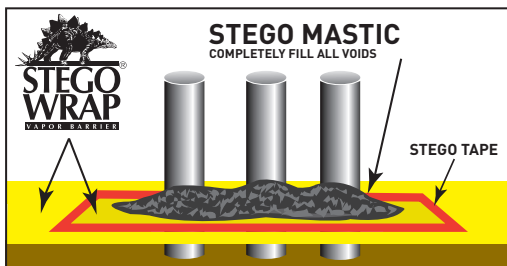


FIGURE 5: MULTIPLE PIPE PENETRATION SEALING



MULTIPLE PIPE PENETRATION SEALING:

Multiple pipe penetrations in close proximity and very small pipes may be sealed using Stego Wrap and Stego Mastic for ease of installation (See Figure 5).

NOTE: Stego Industries, LLC's ("Stego") installation instructions are based on ASTM E1643 - *Standard Practice for Selection, Design, Installation, and Inspection of Water Vapor Retarders Used in Contact with Earth or Granular Fill Under Concrete Slabs*. These instructions are meant to be used as a guide, and do not take into account specific job site situations. Consult local building codes and regulations along with the building owner or owner's representative before proceeding. If you have any questions regarding the above mentioned installation instructions or Stego products, please call us at 877-464-7834 for technical assistance. While Stego employees and representatives may provide technical assistance regarding the utility of a specific installation practice or Stego product, they are not authorized to make final design decisions.

SUB-SLAB VAPOR BARRIER INSTALLATION SPECIFICATIONS

PART 1 – GENERAL

1.1 SUMMARY

- A. Products supplied under this section:
 - 1. Vapor barrier and installation accessories for installation under concrete slabs.
- B. Related sections (to be developed by the general contractor within the Construction Drawings):
 - 1. Cast-in-Place Concrete
 - 2. Vapor Collection Piping

1.2 REFERENCES

- A. American Society for Testing and Materials (ASTM):
 - 1. ASTM E1745-17 Standard Specification for Plastic Water Vapor Retarders Used in Contact with Soil or Granular Fill Under Concrete Slabs.
 - 2. ASTM E1643-11 Selection, Design, Installation, and Inspection of Water Vapor Retarders Used in Contact with Earth or Granular Fill Under Concrete Slabs.
- B. Technical Reference – American Concrete Institute (ACI):
 - 1. ACI 302.2R-06 Guide for Concrete Slabs that Receive Moisture-Sensitive Flooring Materials.
 - 2. ACI 302.1R-15 Guide to Concrete Floor and Slab Construction.

1.3 SUBMITTALS

- A. Quality control/assurance:
 - 1. Summary of test results per paragraph 9.3 of ASTM E1745.
 - 2. Manufacturer's samples and literature.
 - 3. Manufacturer's installation instructions for placement, seaming, penetration prevention and repair, and perimeter seal per ASTM E1643.
 - 4. All mandatory ASTM E1745 testing must be performed on a single production roll per ASTM E1745 Section 8.1.

PART 2 – PRODUCTS

2.1 MATERIALS

- A. Vapor barrier shall have all of the following qualities:
 - 1. Maintain permeance of less than 0.01 Perms [grains/(ft² · hr · inHg)] as tested in accordance with mandatory conditioning tests per ASTM E1745 Section 7.1 (7.1.1-7.1.5).
 - 2. Other performance criteria:
 - a. Strength: ASTM E1745 Class A.
 - b. Thickness: 15 mils minimum
 - 3. Provide third party documentation that all testing was performed on a single production roll per ASTM E1745 Section 8.1
- B. Vapor barrier products:
 - 1. Basis of Design: Stego Wrap Vapor Barrier (15-mil) by Stego Industries LLC., (877) 464-7834 www.stegoindustries.com.
 - 2. Alternate vapor barrier materials may be allowed if approved in advance by Engineer, MDE, and USEPA, and if documentation is provided to demonstrate that the proposed alternate is equal to or better than the specified material.

2.2 ACCESSORIES

- A. Seams:
 - 1. Stego Tape by Stego Industries LLC

SUB-SLAB VAPOR BARRIER INSTALLATION SPECIFICATIONS

- B. Sealing Penetrations of Vapor barrier:
 - 1. Stego Mastic by Stego Industries LLC
 - 2. Stego Tape by Stego Industries LLC
- C. Perimeter/edge seal:
 - 1. Stego Crete Claw by Stego Industries LLC
 - 2. Stego Term Bar by Stego Industries LLC
 - 3. StegoTack Tape (double-sided sealant tape) by Stego Industries LLC
- D. Penetration Prevention (if required):
 - 1. Beast Foot by Stego Industries LLC
- E. Vapor Barrier-Safe Screed System (if used):
 - 1. Beast Screed by Stego Industries, LLC

PART 3 – EXECUTION

3.1 PREPARATION

- A. Ensure that subsoil is approved by Engineer.
 - 1. Level and compact base material.

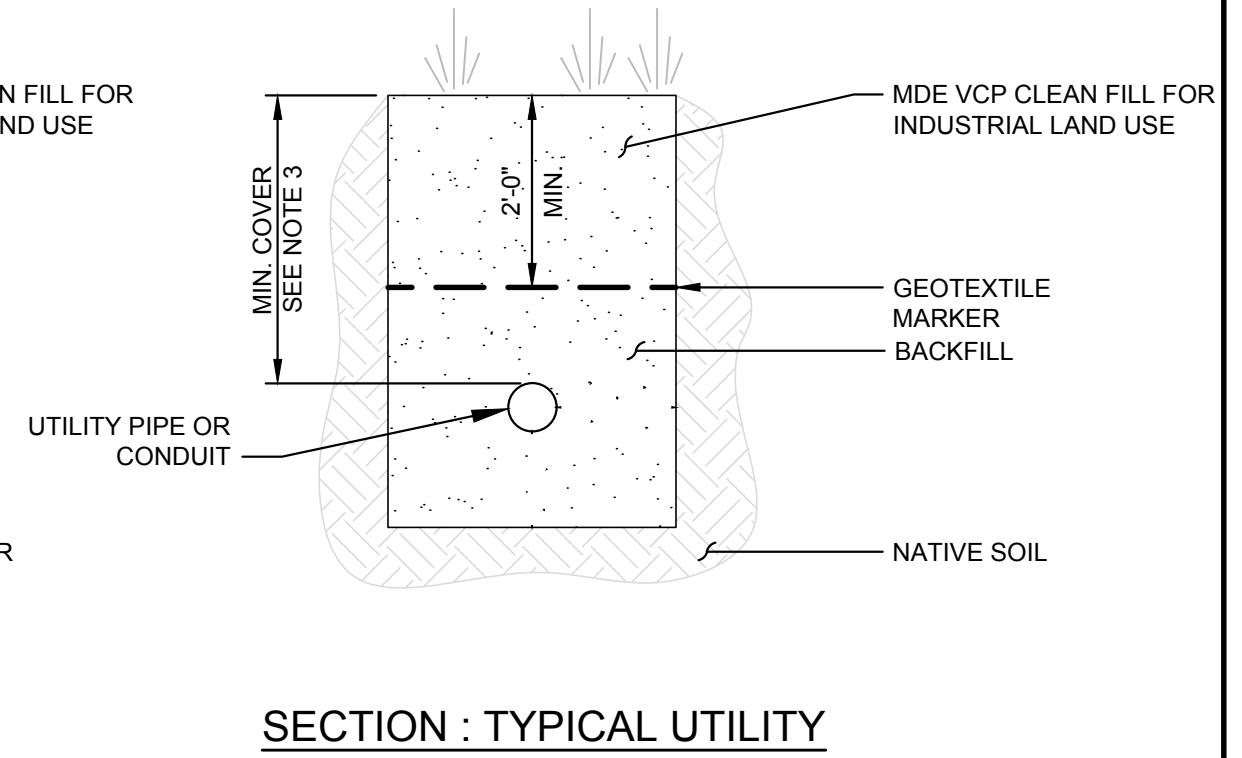
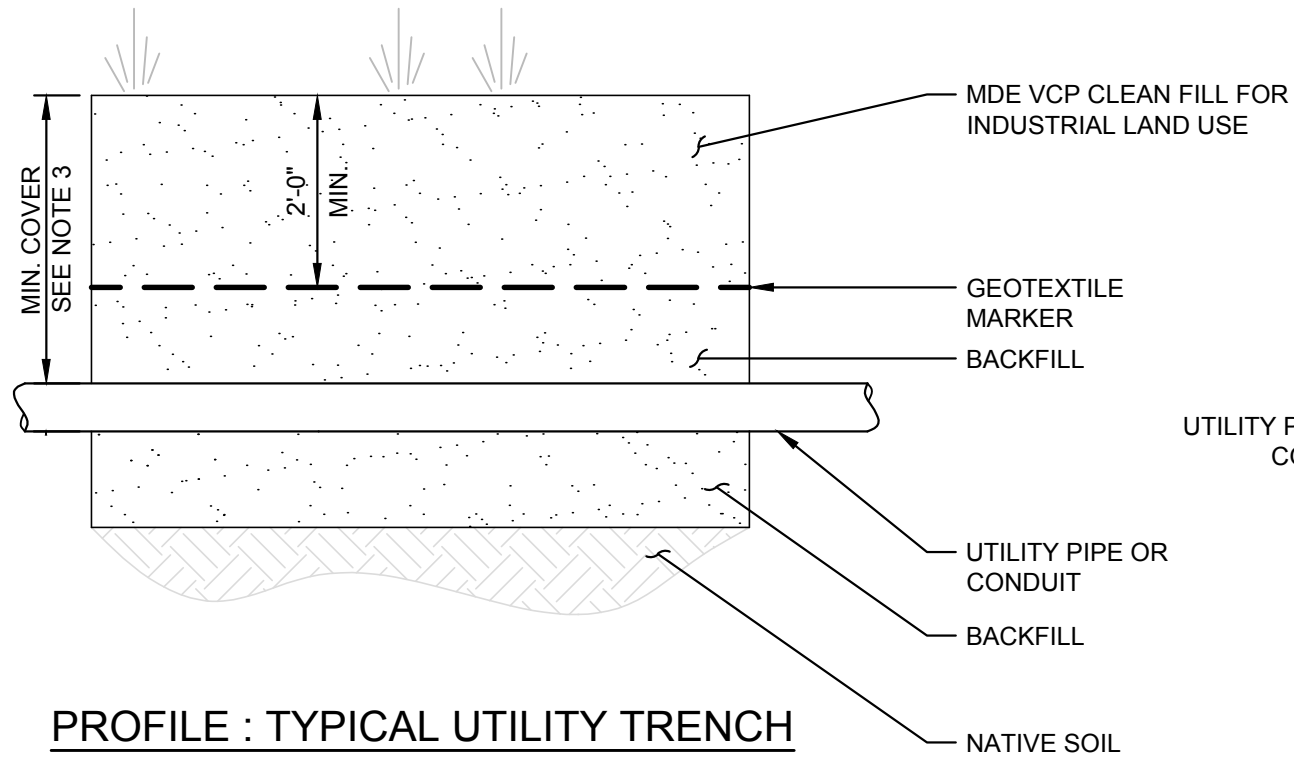
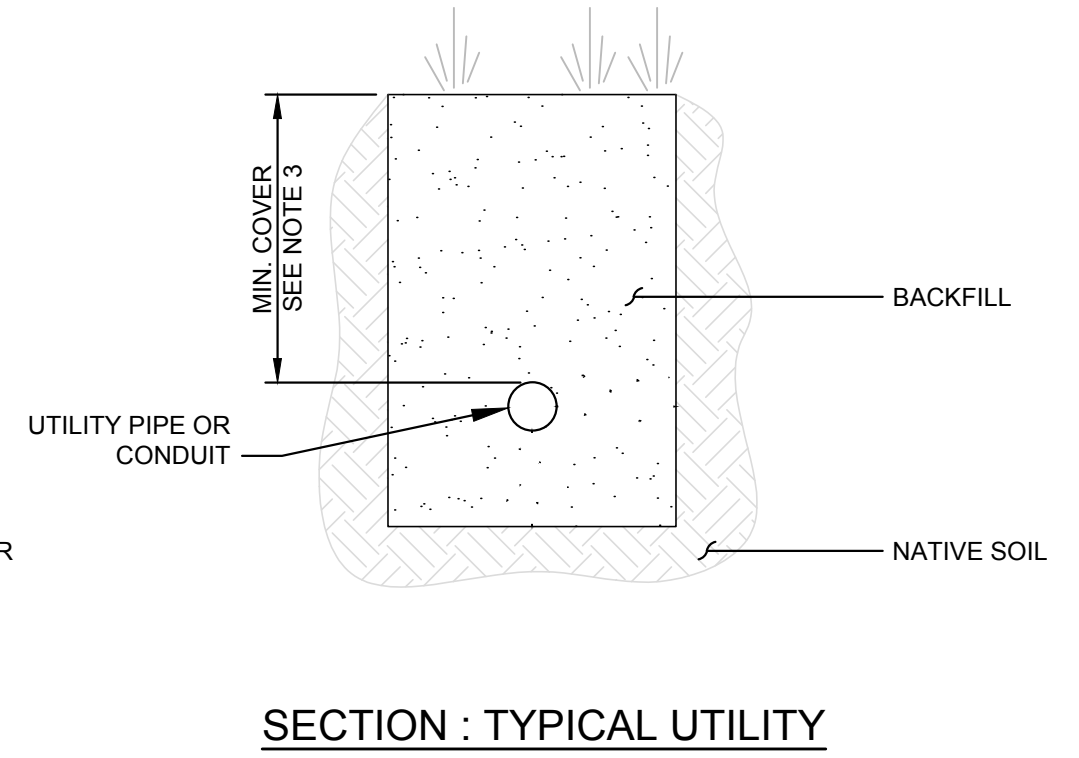
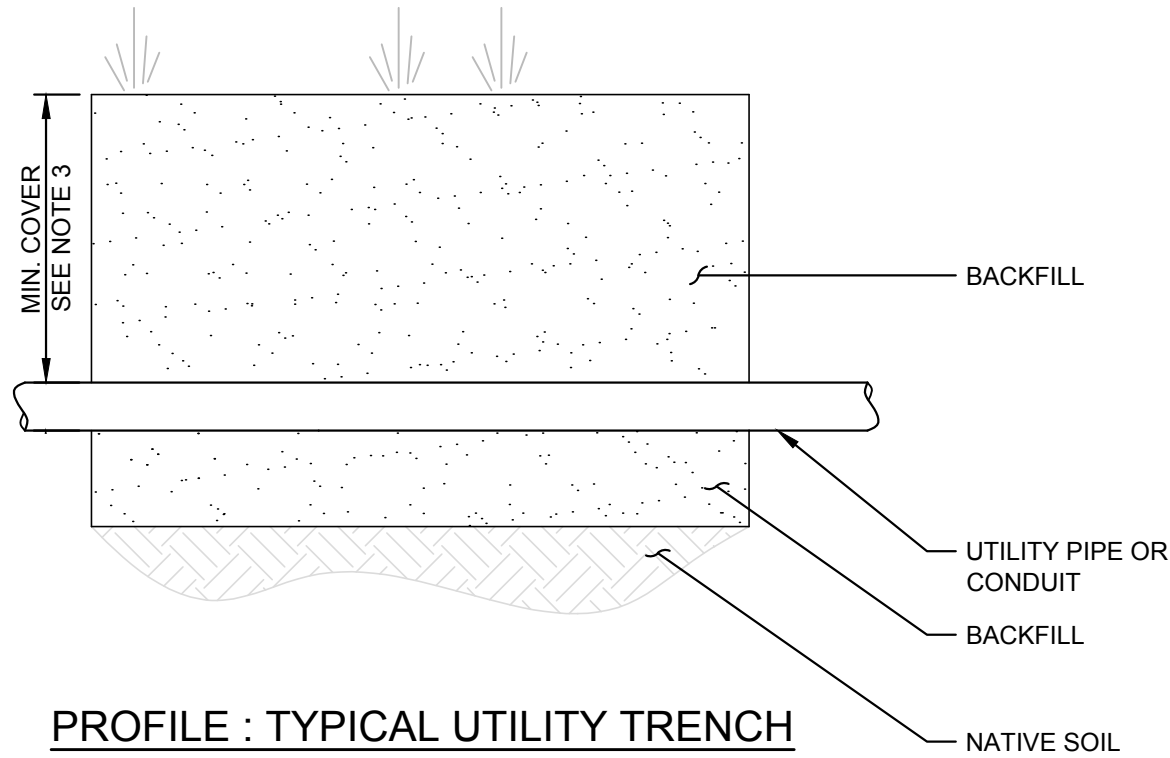
3.2 INSTALLATION

- A. Install vapor barrier in accordance with ASTM E1643.
 - 1. Unroll vapor barrier with the longest dimension parallel with the direction of the concrete placement and face laps away from the expected direction of the placement whenever possible.
 - 2. Extend vapor barrier to the perimeter of the slab. If practicable, terminate it at the top of the slab, otherwise (a) at a point acceptable to the structural engineer or (b) where obstructed by impediments, such as dowels, waterstops, or any other site condition requiring early termination of the vapor barrier. At the point of termination, seal vapor barrier to the foundation wall, grade beam or slab itself.
 - a. If sealing to the slab is practical, seal vapor barrier to the entire slab perimeter using Stego Crete Claw, per manufacturer's instructions.
 - b. If sealing to a stem wall or wall, seal vapor barrier to the entire perimeter wall or footing/grade beam with double sided StegoTack Tape, or both Stego Term Bar and StegoTack Tape, per manufacturer's instructions. Ensure the concrete is clean and dry prior to adhering tape.
 - 3. Overlap joints 6 inches and seal with manufacturer's seam tape.
 - 4. Apply seam tape/Crete Claw to a clean and dry vapor barrier.
 - 5. Seal all penetrations (including pipes, footings, columns, utilities) per manufacturer's instructions.
 - 6. For interior forming applications, avoid the use of non-permanent stakes driven through vapor barrier. Use blunt-end and/or threaded nail stakes (screed pad posts) and insert them into Beast Foot. Ensure Beast Foot's peel-and-stick adhesive base is fully adhered to the vapor barrier.
 - 7. If non-permanent stakes must be driven through vapor retarder, repair as recommended by vapor retarder manufacturer.
 - 8. Use reinforcing bar supports with base sections that eliminate or minimize the potential for puncture of the vapor barrier.
 - 9. Repair damaged areas with vapor barrier material of similar (or better) permeance, puncture and tensile.
 - 10. For vapor barrier-safe concrete screeding applications (if used), install Beast Screed (vapor barrier-safe screed system) per manufacturer's instructions prior to placing concrete.

APPENDIX E

GENERAL NOTES:

1. ALL PIPES OR CONDUIT SHALL BE LEAK-PROOF AND WATERTIGHT. ALL JOINTS SHALL BE SEALED OR GASKETED.
2. ALL PIPES SHALL BE PROPERLY PLACED AND BEDDED TO PREVENT MISALIGNMENT OR LEAKAGE. PIPE BEDDING SHALL BE INSTALLED IN SUCH A MANNER AS TO MINIMIZE THE POTENTIAL FOR ACCUMULATION OF WATER AND CONCENTRATED INFILTRATION.
3. MINIMUM COVER ABOVE UTILITY SHALL BE BASED ON SPECIFIC UTILITY REQUIREMENTS.
4. TRENCHES SHALL BE BACKFILLED WITH BEDDING AND MATERIALS APPROVED BY MDE.
5. FOR ANY UTILITY SEGMENT WHICH GOES THROUGH AN AREA WHICH IS DESIGNATED TO RECEIVE A LANDSCAPED CAP, THE UPPER 2 FEET OF BACKFILL MUST MEET THE REQUIREMENTS OF MDE VCP CLEAN FILL FOR INDUSTRIAL LAND USE. IN THIS CASE THE MDE VCP CLEAN FILL WILL BE UNDERLAIN BY A GEOTEXTILE MARKER FABRIC. UTILITY SEGMENTS WHICH GO THROUGH AREAS WHICH DO NOT REQUIRE CAPPING OR ARE DESIGNATED TO RECEIVED A PAVED CAP WILL BE BACKFILLED WITH MATERIALS APPROVED BY MDE FOR THIS USE.



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APPENDIX F

Utility Excavation NAPL Contingency Plan

Revision 4 – June 19, 2017

Introduction:

Proposed underground utilities and excavations necessary for the redevelopment of the Tradepoint Atlantic property may encounter areas of petroleum and/or Oil & Grease contamination in soil. The assessment of total petroleum hydrocarbons (TPH) diesel range organics (DRO), gasoline range organics (GRO), Oil & Grease, and/or non-aqueous phase liquid (NAPL) completed as part of each Phase II Investigation includes the following:

- Each soil boring with evidence of NAPL (i.e., containing a sheen or free oil in the soil core), whether located near utilities or not, is investigated via the installation of a piezometer to assess mobility to groundwater. If measureable NAPL is present in the initial piezometer, additional soil borings and shallow temporary piezometers are installed surrounding the initial detection to delineate the impacts. Each piezometer installed to delineate the presence or absence of NAPL is checked with an oil-water interface probe immediately after installation, 48 hours after installation, and at least 30 days after installation.
- TPH-DRO/GRO and Oil & Grease data, once received, are assessed in their magnitude and location respective to subsurface utilities, stormwater conveyances, and surface waters.
- Locations that exhibit elevated detections of TPH/Oil & Grease or evidence of NAPL, that are within reasonable proximity (i.e. 25 feet) to subsurface utilities or stormwater conveyances and/or within reasonable proximity (i.e. 100 feet) to surface waters, are identified for further delineation and selective removal (if warranted).

Any NAPL identified in soil borings or piezometers during the Phase II Investigation would be noted on relevant logs and identified in Response and Development Work Plans for construction planning purposes. Despite these planning efforts, unidentified pockets of contamination (including NAPL) may still be encountered during construction. This contingency plan provides the procedures to be utilized during construction work to properly address response and construction techniques if any materials impacted with NAPL are encountered.

Objectives:

The purpose of this plan is to describe procedures to be followed in the event that NAPL is encountered in utility trenches or other excavations during development of the Tradepoint Atlantic property. The specific objectives of this plan and the procedures outlined herein are:

1. To ensure identification and proper management of Oil & Grease and petroleum-contaminated soils.
2. To ensure proper worker protection for working in areas of Oil & Grease and petroleum contamination.
3. To ensure that the installation of new utilities does not create new preferential flow paths for the migration of free-phase hydrocarbons (Oil & Grease, TPH-DRO/GRO, etc.) or soil vapors.

Identification of Oil & Grease and Petroleum Contaminated Soil:

An Environmental Professional (EP) will be on-site to determine if soils show evidence of the presence of Oil & Grease or TPH present as NAPL during installation of utility trenches or other excavation activities completed during development. Oil & Grease or petroleum-contaminated soils can be identified by the presence of free oil, oil staining, a petroleum odor, or any combination of these conditions. Free oil (NAPL) is liquid oil which could potentially be drained or otherwise extracted from the soil, and is the focus of this contingency plan, although severe staining accompanied by odors should be addressed via the same contingency measures provided herein (based on the judgement of the EP). The appearance of oil staining is not always consistent, but varies depending on the nature of the oil, the soil type, and the age of the release. Staining associated with old petroleum contamination often has a greenish hue, but may also be brown or black. The olfactory sense is the most sensitive instrument for identifying petroleum contamination in the field. Therefore, a petroleum odor may be noted although there is no visible sign of oil or staining. In some instances, decaying organic matter can produce an odor similar to petroleum, but this is rare.

If NAPL is encountered during construction, the extent of impacts shall be delineated by excavating trenches or installing four soil borings (two in each direction) perpendicular to the utility alignment or excavation to examine the soil for physical evidence of NAPL. Perpendicular transects will be investigated every 50 feet along the section of the utility trench or excavation where there is physical evidence of NAPL. Each transect will extend to a distance of 10 feet from the edge of the utility trench or excavation. This represents the maximum distance which would require mandatory excavation to mitigate potential migration risks (see below).

NAPL delineation will be guided primarily by screening observations from the perpendicular borings or trenches, and samples will be collected to test for extractable Oil & Grease or petroleum-contaminated soil using the Oil Sticks™ test kit. This test kit provides a determination of whether hydrocarbons are present in soil and extractable (i.e. could mobilize as a NAPL). Oil Sticks™ change from a pale blue to a deep blue color when they come in contact with free product. This instantaneous change in color occurs even when miniscule amounts of product come in contact with the strip. The sensitivity of Oil Sticks™ to determine the presence/absence of oil is reported by the manufacturer to be about 1,000 to 2,000 mg/kg. The

field test is performed by placing approximately 3 tablespoons of soil in a clean sample cup and adding enough water to cover the sample. After stirring the sample and waiting ~1 minute, the Oil Sticks™ test strip should be swished through the water, making sure to touch the strip to the sides of the cup where product may collect at the interface (meniscus) between the cup, water, and air. If the strip turns deep blue, or deep blue spots appear, oil or hydrocarbon is present. However, the MDE has observed that the Oil Sticks™ method may produce inconsistent results. Therefore, documentation of all screening methods is necessary during boring/trenching work. This documentation shall include an accurate record of visual and olfactory screening, along with a narrative with photographs. Field screening will be aided by photoionization detector (PID) results, and Oil Sticks™ samples should be biased to target elevated PID readings, if any. The agencies have requested that all soil samples prepared for the Oil Sticks™ field test be photographed for evidence of sheen/residue on the cup sides. Detailed records are required to be submitted with the project-specific Completion Report.

If petroleum or Oil & Grease impacts are identified in Site soils based on use of the Oil Sticks™ test kit or other field screening methods, disposal requirements will be determined using the quantitative PetroFLAG™ hydrocarbon analysis system or fixed laboratory analysis (see following section). The PetroFLAG™ hydrocarbon analysis system is a broad spectrum field test kit suitable for TPH contamination regardless of the source or state of degradation (Dexsil Corporation). PetroFLAG™ field test kits do not distinguish between aromatic and aliphatic hydrocarbons, but quantify all fuels, oils, and greases as TPH. Dilutions can be used to determine concentrations of TPH/Oil & Grease above the normal calibration range. Dexsil notes that positive results for TPH may occur if naturally occurring waxes and oils, such as vegetable oils, are present in the sample. Additional detail regarding the procedure for the PetroFLAG™ kit is given in **Attachment 1**.

Soil Excavation, Staging, Sampling and Disposal:

The EP will monitor all utility trenching and excavation activities for signs of potential contamination. In particular, soils will be monitored with a hand-held PID for potential VOCs, and will also be visually inspected for the presence of staining, petroleum waste materials, or other indications of NAPL contamination that may be different than what was already characterized. Excavated material that is visibly stained or that exhibits a sustained PID reading of greater than 10 ppm will be segregated and containerized or placed in a stockpile on polyethylene or impervious surface until the material can be analyzed using the PetroFLAG™ test kit to characterize the material for appropriate disposal. If a PetroFLAG™ test kit is not available to the contractor, or if the contractor prefers to use fixed laboratory analysis, samples may be characterized via submittal to a laboratory for TPH/Oil & Grease analysis. However, any excavated material containing NAPL (i.e., containing free oil) cannot be characterized for waste disposal using the PetroFLAG™ test kit and must instead be characterized via fixed laboratory analysis, as described in the final paragraph of this section. In addition, any hydrocarbon contaminated soil discovered during construction activities that was not previously

characterized must also be analyzed for PCBs prior to removal and transport to an appropriate disposal facility. If excavated and stockpiled, such materials will be covered with a plastic tarp so that the entire stockpile is encapsulated, and anchored to prevent the elements from affecting the integrity of the containment. The MDE will be notified if such materials are encountered during utility work.

Soil exhibiting physical evidence of NAPL contamination or elevated TPH/Oil & Grease with detections in the low percentage range, which is located within 10 feet of a proposed new utility or subsurface structure (i.e., foundation, sump, electrical vault, underground tank, etc.), will be excavated and segregated for disposal at the on-site nonhazardous landfill (Greys Landfill) or an off-site facility pending the completion of any required PCB analytical testing. Impacted soil which is located greater than 10 feet away from the proposed utility or subsurface structure may be left in place and undisturbed. The extent of the excavation will be determined in the field following visual/olfactory screening supplemented by the PID and Oil Sticks™ test kit, but soil disposal requirements will be determined with the PetroFLAG™ test kit (since the Oil Sticks™ method is not quantitative) or via fixed laboratory analysis for TPH/Oil & Grease (if preferred by the contractor or if the PetroFLAG™ test kit is unavailable to the contractor).

Any recovered NAPL will be collected for off-site disposal. As required by the appropriate and MDE approved facility, samples impacted by NAPL (i.e., containing free oil) will be collected for profiling/waste characterization and submitted to a fixed laboratory, as mentioned above, for the following analyses: metals, VOCs, TPH-DRO/GRO, and/or additional analysis required by the selected disposal facility. Upon receipt of any additional characterization analytical results, the MDE will be notified of the proposed disposal facility. Non-impacted material with no evidence of NAPL (i.e. soils that may contain measureable concentrations of TPH/Oil & Grease but below percentage levels) may be placed on the Site in areas to be paved or capped as long as all other requirements specified in the Response and Development Work Plan (or similar governing document) are met.

Initial Reporting:

If evidence of NAPL in soil or groundwater is encountered during excavation, it will be reported to the MDE within two hours. Information regarding the location and characteristics of any NAPL contaminated soil will be documented as follows:

- Location (exact stationing);
- Extent of contamination (horizontally and vertically – prepare a sketch including dimensions);
- Relative degree of contamination (i.e. free oil with strong odor vs. staining); and
- Visual documentation (take photographs and complete a photograph log)

Utility Installations in Impacted Areas:

Underground piping or conduits installed through areas of Oil & Grease or petroleum contamination shall be leak proof and water tight. All joints will be adequately sealed or gasketed, and pipes or conduits will be properly bedded and placed to prevent leakage. All trench backfill will meet the MDE definition of clean fill, or otherwise be approved by the MDE. Pipe bedding will be installed to minimize the potential for accumulation of water and concentrated infiltration. This can be achieved by using a relatively small amount of low-permeability pipe bedding; open-graded stone will be avoided or only used in thicknesses of 6 inches or less. Bedding must be properly placed and compacted below the haunches of the pipe. Clay, flowable fill, or concrete plugs will be placed every 100 feet across any permeable bedding to minimize the preferential flow and concentration of water along the bedding of such utilities.

If required, each trench plug will be constructed with a 2-foot-thick clay plug or 1-foot-thick flowable fill or concrete plug, perpendicular to the pipe, which extends at least 1 foot in all directions beyond the permeable pipe bedding. The plug acts as an anti-seep collar, and will extend above the top of the pipe. Installation of each trench plug will follow the completion of the trench excavation, installation of granular pipe bedding (because dense-graded aggregate or soil or other pipe bedding is difficult to properly compact below the haunches of the pipe), and seating of the pipe. The trench plug will then be installed by digging out a 1-foot trench below and around the pipe corridor, and placing clay, flowable fill, or concrete to construct the plug. A specification drawing for installation of the trench plug has been provided as **Figure 1**.

Attachment 1 - PetroFLAG™ Procedure

PetroFLAG™ field test kits use a proprietary turbidimetric reaction to determine the TPH concentration of solvent extracted samples (USEPA). Calibration standards provided with the unit are used to perform a two-point calibration for the PetroFLAG™. A blank and a 1,000 ppm standard are run by the analyzer unit to create an internal calibration curve.

Analysis of a soil sample is performed using three simple steps: extraction, filtration, and analysis. The PetroFLAG™ analysis is performed as follows:

- Place a 10 gram soil sample in a test tube.
- Add extraction solvent to the tube.
- Shake the tube intermittently for four minutes.
- Filter the extract into a vial that contains development solution
- Allow the solution to react for 10 minutes.

The filtration step is important because the PetroFLAG™ analyzer measures the turbidity or "optical density" of the final solution. Approximately 25 samples can be analyzed per hour. The vial of developed solution is placed in the meter, and the instrument produces a quantitative reading that reveals the concentration of hydrocarbons in the soil sample. The PetroFLAG™ method quantifies all fuels, oils, and greases as TPH between 15 and 2000 ppm (Dexsil Corporation). A 10x dilution of the filtered extraction solvent will be completed to allow for quantification of soil concentrations in excess of 10,000 ppm. The specially designed PetroFLAG™ analyzer allows the user to select, in the field, the response factor that is appropriate for the suspected contaminant at each site. Vegetable-based oils have been shown to exhibit a response factor of 18% (EPA Method 9074). Using the selected response factor, the analyzer compensates for the relative response of each analyte and displays the correct concentration in parts per million (ppm).

References:

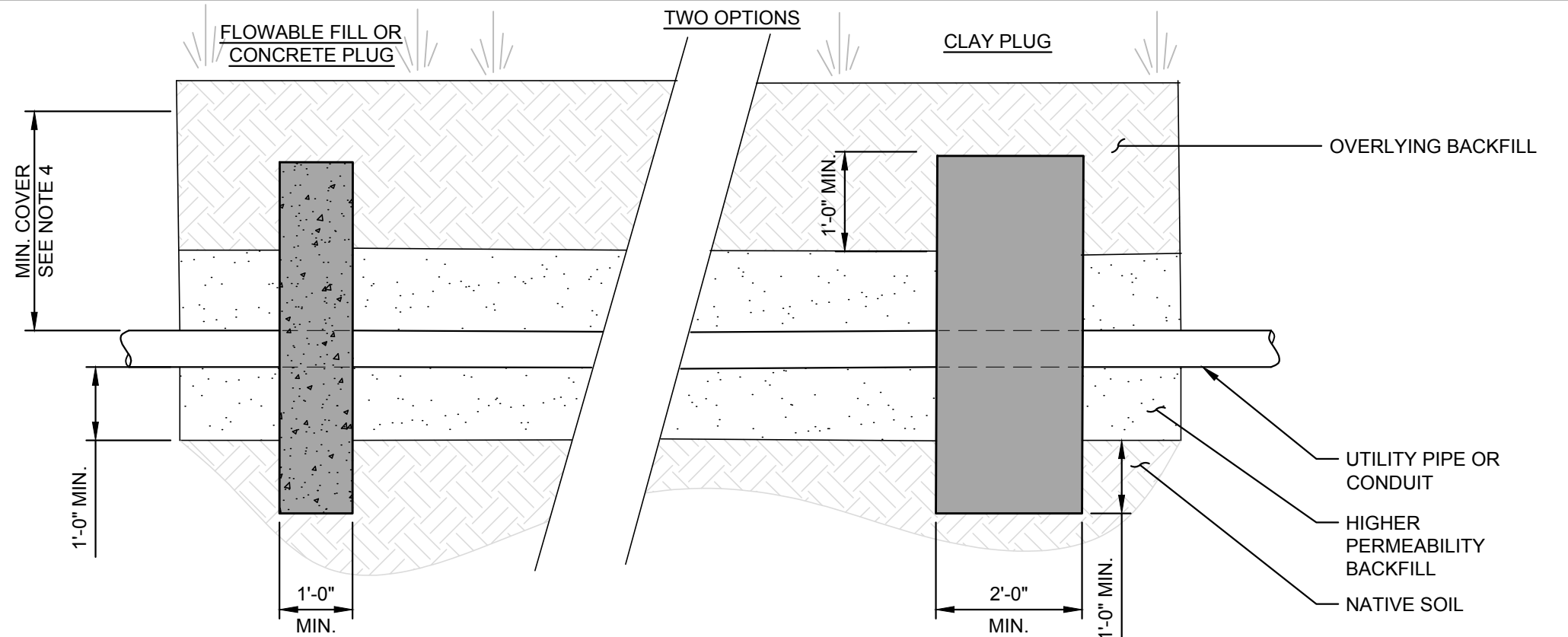
U.S. Environmental Protection Agency (EPA). Contaminated Site Clean-up Information (Clu-IN): Test Kits. Office of Superfund Remediation and Technology Innovation. <http://www.clu-in.net/characterization/technologies/color.cfm>

Dexsil Corporation. 2016. PetroFLAG Analyzer System (PF-MTR-01). http://www.dexsil.com/products/detail.php?product_id=23

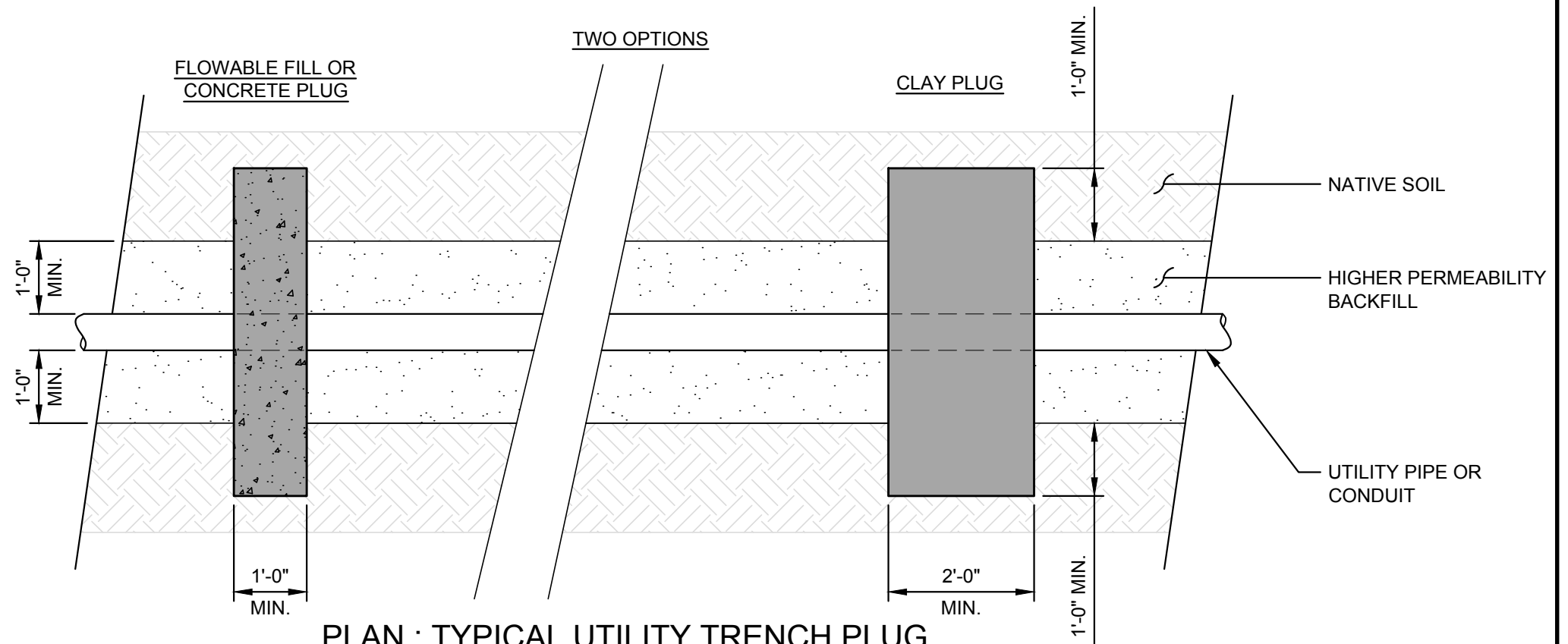
EPA SW-846 Method Number 9074 - Turbidimetric Screening Procedure for Total Recoverable Hydrocarbons in Soil

GENERAL NOTES:

1. ALL PIPES OR CONDUIT PASSING THROUGH AREAS OF PETROLEUM CONTAMINATION SHALL BE LEAK-PROOF AND WATERTIGHT. ALL JOINTS SHALL BE SEALED OR GASKETED.
2. ALL PIPES SHALL BE PROPERLY PLACED AND BEDDED TO PREVENT MISALIGNMENT OR LEAKAGE. PIPE BEDDING SHALL BE INSTALLED IN SUCH A MANNER AS TO MINIMIZE THE POTENTIAL FOR ACCUMULATION OF WATER AND CONCENTRATED INFILTRATION.
3. ANTI-SEEP COLLARS FROM THE PIPE MANUFACTURER, THAT ARE PRODUCED SPECIFICALLY FOR THE PURPOSE OF PREVENTING SEEPAGE AROUND THE PIPE, ARE ACCEPTABLE IF INSTALLED IN STRICT ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS, AND ONLY WITH PRIOR APPROVAL BY EAG.
4. MINIMUM COVER ABOVE UTILITY SHALL BE BASED ON SPECIFIC UTILITY REQUIREMENTS.
5. TRENCHES SHALL BE BACKFILLED WITH BEDDING AND MATERIALS APPROVED BY MDE.
6. FOR ADDITIONAL REQUIREMENTS, INCLUDING THE USE OF MDE VCP CLEAN FILL FOR INDUSTRIAL LAND USE AND INSTALLATION OF GEOTEXTILE MARKER FABRIC, REFER TO NOTE 5 ON THE TYPICAL UTILITY CROSS SECTIONS.
7. ALL UTILITIES INSTALLED THROUGH AREAS CONTAINING NAPL OR ELEVATED CHEMICAL IMPACTS WITH THE POTENTIAL TO TRANSMIT VAPORS ALONG PREFERENTIAL FLOW PATHWAYS SHALL BE EITHER 1) BACKFILLED WITH LOW PERMEABILITY BACKFILL MATERIAL (LESS THAN OR EQUAL TO THE PERMEABILITY OF THE EXISTING SUBGRADE), OR 2) INSTALLED WITH TRENCH PLUGS ALONG THE ALIGNMENT IN ACCORDANCE WITH THE DETAILS SHOWN ON THIS PLAN AND THE FOLLOWING NOTES:
 - A.) UTILITY TRENCH PLUGS SHALL BE INSTALLED AT 100-FOOT (MAX.) INTERVALS THROUGH ALL AREAS OF NAPL CONTAMINATION.
 - B.) UTILITY TRENCH PLUGS SHALL EXTEND A MINIMUM OF 1-FOOT IN ALL DIRECTIONS BEYOND ANY HIGHER PERMEABILITY BACKFILL MATERIALS (I.E., MATERIALS EXCEEDING THE PERMEABILITY OF THE EXISTING SUBGRADE).



SECTION : TYPICAL UTILITY TRENCH PLUG



PLAN : TYPICAL UTILITY TRENCH PLUG

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UTILITY TRENCH PLUG
Sparrows Point Site
EnviroAnalytics Group, LLC

September 2018
Not to Scale
160443M

Figure
1

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