

**Partial Corrective Action Plan: Proposed
Renovation Area at U-32 Middle and High
School**

930 Gallison Hill Road, East Montpelier, Vermont
SMS #2023-5225
June 18, 2026



PROJECT NO.

20231031

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Title and Approval Page

Document Title

Partial Corrective Action Plan: Proposed Renovation Area at U-32 Middle and High School, 930 Gallison Hill Road, East Montpelier, Vermont, SMS #2023-5225

June 18, 2026

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Executive Summary

This Partial Corrective Action Plan (CAP) has been prepared by Stone Environmental, Inc. (Stone) on behalf of Washinton Central Unified School District (WCUSD) for the U-32 Middle and High School (U-32) located at 930 Gallison Hill Road in East Montpelier, Vermont (the Site). U-32 serves seventh through twelfth grade in a multi-story, 180,000 square foot building, originally constructed in 1970.

The school includes two ancillary buildings: a “secondary building” which was constructed in 1990 and known as the Shapiro Building, and an “administrative building” which was constructed in 2009 and houses the WCUSD offices. The balance of the Site is comprised of the U-32 campus and includes athletic fields, forested areas with trails, and parking areas and driveways. Neighboring properties are a mix of residential and forest.

As part of a planned 2027 capital improvement project, U-32 is planning to renovate the kitchen/preparation area. Among other improvements, the renovation will include removal of caulk that was previously found to contain polychlorinated biphenyls (PCBs) above the US EPA Toxic Substances Control Act (TSCA) bulk product threshold and is suspected to be a source of impacts to indoor air quality.

Corrective actions are necessary in the kitchen/preparation area to address the following conditions:

1. PCBs are present in brown-grey caulk surrounding doorways and interior windows within the kitchen area at concentrations above the TSCA bulk product threshold of 50 milligrams per kilogram (mg/kg).
2. PCBs have diffused into adjacent porous building materials, including grout at concentrations greater than the PCB remediation waste threshold for high occupancy use of 1.0 mg/kg.

Corrective actions have been developed and are included in this Partial CAP as follows:

- Abatement of PCB bulk product (PCB-containing caulk, adjacent doors or interior windows, and 9 inches of adjacent masonry).
- Disposal of PCB bulk product at a facility approved to receive PCB bulk product waste.
- Cleanup verification sampling of remaining concrete masonry unit (CMU) wall and grout to confirm that PCBs have not diffused into remaining building materials at concentrations greater than 1 mg/kg.
- Confirmatory indoor air sampling to assess the presence of PCBs in indoor air of the kitchen.

Corrective actions are planned to commence in Summer 2027. Corrective actions related to PCB impacts in other areas of the Site building will be detailed at a later date under separate cover.

Partial Corrective Action Plan: Proposed Renovation Area at U-32 Middle and High School, 930 Gallison Hill Road, East Montpelier, Vermont, SMS #2023-5225

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1. Introduction

This Partial Corrective Action Plan (CAP) has been prepared by Stone Environmental, Inc. (Stone) on behalf of Washinton Central Unified School District (WCUSD) for the U-32 Middle and High School (U-32) located at 930 Gallison Hill Road in East Montpelier, Vermont (the Site). As part of a planned 2027 capital improvement project, U-32 is planning to renovate the kitchen/preparation area. Among other improvements, the renovation will include removal of caulk that was previously found to contain polychlorinated biphenyls (PCBs) above the US EPA Toxic Substances Control Act (TSCA) bulk product threshold and is suspected to be a source of impact to indoor air quality.

Corrective actions are necessary at the Site to address the following conditions:

1. PCBs are present in brown-grey caulk surrounding doorways and interior windows within the kitchen area at concentrations above the TSCA bulk product threshold of 50 milligrams per kilogram (mg/kg).
2. PCBs have diffused into adjacent porous building materials, including grout at concentrations greater than the PCB remediation waste threshold for high occupancy use of 1.0 mg/kg.

This document has been prepared in accordance with the Vermont Department of Environmental Conservation (VT DEC) Investigation and Remediation of Contaminated Properties Rule (IRule). Corrective actions related to PCB impacts in other areas of the Site building will be detailed at a later date under separate cover.

1.1. Site Information

U-32 serves seventh through twelfth grade in a multi-story, 180,000 square feet building, originally constructed in 1970 (Figure 1 and Figure 2, Appendix A).

The school also includes two ancillary buildings: a “secondary building” which was constructed in 1990 and known as the Shapiro Building, and an “administrative building” which was constructed in 2009 and houses the WCUSD offices. Since neither of these structures were built prior to 1980, they were excluded from the initial assessments for PCBs in indoor air.

The balance of the Site is comprised of the U-32 campus and includes athletic fields, forested areas with trails, and parking areas and driveways. Neighboring properties are a mix of residential and forest.

Contact information for the current property owner is:

Washington Central Unified School District
1130 Gallison Hill Road
Montpelier, Vermont 05602
802-229-0553

1.2. Prior Environmental Investigations

Previous environmental investigations performed to assess PCBs in indoor air and building materials at the Site are described in the sections below. Results for CAFÉ A (i.e. the kitchen/preparation area) are shown on Figures 4 through 6 in Appendix A and are included in data tables in Appendix B.

1.2.1. Indoor Air Sampling Report: U-32 Middle and High School, East Montpelier, Vermont, Stone Environmental Inc., October 25, 2023

On August 25 and 26, 2023, a total of 72 indoor air samples were collected from 69 rooms within six room groupings throughout the portions of the U-32 school building built prior to 1980 for PCB analysis. Room groupings were identified in the Work Plan dated August 10, 2023, and were based on the results of a room-by-room inventory of potentially PCB-containing building materials performed by Stone in February 2023. Rooms with similar construction/renovation types, history, and inventory of materials were grouped together. PCBs, primarily resembling Aroclors 1221 and 1248, were detected in all 72 of the indoor air samples; 20 samples exceeded the relevant Grade 7-12 School Action Limit (SAL) of 0.1 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). Twelve samples were within 75% of the SAL (i.e., between 0.075 and 0.1 $\mu\text{g}/\text{m}^3$). No sample results were greater than the Grade 7-12 Immediate Action Limit (IAL) of 0.3 $\mu\text{g}/\text{m}^3$.

CAFÉ A was included in Group 3. While CAFÉ A was not sampled, PCBs concentrations in other rooms in Group 3 ranged from 0.039 $\mu\text{g}/\text{m}^3$ to 0.121 $\mu\text{g}/\text{m}^3$ with five of nine samples exceeding the Grade 7-12 SAL.

1.2.2. Quarterly Indoor Air Monitoring, U-32 Middle and High School, 930 Gallison Hill Road, East Montpelier, Vermont, April 9, 2025

Quarterly monitoring of rooms which had concentrations of PCBs within 75% of the SAL during the initial indoor air assessment (August 2023) event was conducted in April 2024 and July/August 2024. No sample exceeded the SAL during either of the quarterly monitoring events. CAFÉ A was not among the rooms sampled.

1.2.3. Quarterly Indoor Air Monitoring, U-32 Middle and High School, 930 Gallison Hill Road, East Montpelier, Vermont, November 7, 2025

Quarterly monitoring of rooms with PCB concentrations within 75% of the SAL during prior indoor air monitoring events was conducted in December 2024 and February 2025. No sample exceeded the SAL during either of the events. CAFÉ A was not among the rooms sampled.

1.2.4. Supplemental Assessment of Indoor Air Quality and Building Materials, U-32 Middle and High School, 930 Gallison Hill Road, East Montpelier, Vermont, November 8, 2024

To further identify which building materials may be contributing to PCB contamination in indoor air, samples were collected from suspect building materials in rooms where PCB concentrations in indoor air exceeded the SAL, between January 29 and February 6, 2024. Suspect building materials included varieties of adhesive, caulk, paint, grout, mastic, ceiling tile, fireproofing material, projector screen material, sealant, terrazzo-like flooring, and vinyl flooring. Wipe sampling was conducted on potential liquid-containing appliances, such as electrical circuit breakers and ceiling-mounted Univent heaters. This method was used as a presence/absence test for PCBs in cases where a sufficient volume of building materials could not be removed for analysis. In total, 346 building material samples representing 137 unique bulk materials and 17 wipes samples, were collected and analyzed. Caulk and floor mastic in the kitchen area (CAFÉ A) were sampled. Three (of three) caulk samples exceeded the bulk product threshold with concentrations ranging from 53,000 to 71,000 mg/kg. None of the six mastic samples exceeded the threshold.

In addition to the building materials assessment, indoor air in rooms not previously tested was assessed for PCBs between February 26 and March 1, 2024. In total, 123 primary samples were collected and analyzed. No samples exceeded the applicable SAL ($0.1 \mu\text{g}/\text{m}^3$). Two samples had concentrations within 75% of the SAL and were added to the list of locations for continued quarterly monitoring.

Finally, confirmation monitoring of treated indoor air in rooms utilizing mitigation techniques (including carbon air filtration systems and/or enhanced air circulation and cleaning) was conducted. PCBs were detected above laboratory reporting limits in all confirmation indoor air samples; total detectable PCB concentrations ranged from 0.0074 to $0.21 \mu\text{g}/\text{m}^3$; the concentration exceeded the 7-Adult SAL in one room (5225-33 at $0.21 \mu\text{g}/\text{m}^3$).

1.2.5. Additional Supplemental Assessment of Indoor Air Quality and Building Materials Work Plan, U-32 Middle and High School, 930 Gallison Hill Road, East Montpelier, Vermont (Ongoing)

In the 2025 site assessment, additional evaluation was performed on the brownish-grey caulk around windows and doorways in CAFÉ A, which had been identified in the 2024 Supplemental Site Investigation (SSI). Nine primary samples and one field duplicate were collected for PCB analysis from various locations in the doorways and expansion joints of CAFÉ A. Of these locations, eight contained similar brownish-grey caulk that tested above the TSCA bulk product threshold ($50 \text{ mg}/\text{Kg}$), with concentrations ranging from $51 \text{ mg}/\text{Kg}$ to $64,000 \text{ mg}/\text{Kg}$.

1.2.6. Supplemental Site Investigation of Proposed Renovation Area at U-32 Middle and High School, 930 Gallison Hill Road, East Montpelier, Vermont

To assess whether PCBs present in brown-grey caulk located around doorways and interior windows have diffused into the surrounding CMU brick and grout substrate, Stone collected samples of bulk building materials located 3, 6, and 9 inches away from five previously identified caulk-containing PCBs in the kitchen (CAFÉ A). In total, fifteen grout samples were collected and submitted for laboratory analysis for PCBs by EPA Method 8082 with manual Soxhlet extraction. The CMU was not assessed to prevent damage to bricks. Results indicated that PCBs have diffused into adjacent porous building materials at concentrations below the TSCA bulk product threshold ($50 \text{ mg}/\text{kg}$). Concentrations in masonry adjacent to PCB-contaminated caulk are greater than PCB remediation waste thresholds for high occupancy use ($1.0 \text{ mg}/\text{kg}$) to at least 6 inches from the caulk bulk product.

1.2.7. Evaluation of Corrective Action Alternatives for Proposed Renovation Area at U-32 Middle and High School, 930 Gallison Hill Road, East Montpelier, Vermont

Stone prepared a Partial Evaluation of Corrective Action Alternatives (ECAA) for the kitchen/preparation area (CAFÉ A) ahead of a planned 2027 capital improvement project. Among other improvements, renovations will include removal of caulk and adjacent building materials that were previously found to contain PCBs above applicable TSCA thresholds.

The following remedial alternatives have been considered to prevent exposure to PCBs in the kitchen/preparation area through indoor air and direct contact:

- Alternative 1: No Action
- Alternative 2: Removal of all PCB-Contaminated Caulk and Adjacent Porous Material
- Alternative 3: Targeted Removal and Encapsulation

Based on the results of the ECAA and discussion with WCUSD, the recommended corrective action was Alternative 2, complete removal of PCB-containing caulk and adjacent porous building material. Work would be performed under 40 CFR §761.62.

Evaluation of corrective action alternatives related to PCB impacts in other areas of the Site building will be detailed under separate cover.

2. Conceptual Site Model

The following Conceptual Site Model (CSM) provides a set of working hypotheses that describe key aspects of the Site. As with any hypothesis, the CSM may require additional testing to arrive at the desired level of confidence. The CSM includes a discussion of the physical, geologic, and hydraulic attributes of the Site and surrounding area, how chemicals were released at the Site, their transport pathways, fate mechanisms, and potential routes of exposure to ecological and human receptors. The CSM provides the context from which the site investigation is developed and a framework to make sound Site management decisions.

The contaminant of concern at the Site is PCBs, present in indoor air and building materials. As PCBs are not known to have been released to the environmental exterior of the Site building, the geology and hydrogeology of the Site are not described within this report.

2.1. Contaminant Distribution, Fate, and Transport

PCBs are a group of structurally similar man-made chemicals that were manufactured in the United States from 1929 until 1979, when manufacturing PCBs was banned. PCBs were commonly used as plasticizers in building products, such as paint, caulk, and sealant, and as a flame retardant, in construction and renovations of institutional buildings, such as schools, between approximately 1950 and 1979. In addition, PCB-containing dielectric fluid was commonly used in electrical devices such as capacitors and transformers from this same time.

Initial and supplemental assessments at the Site indicate that PCBs are volatilizing from PCB-containing building materials and electrical equipment or caulk/sealants within unit ventilators (univents) heaters and are impacting indoor air quality. In the kitchen area specifically, PCBs were detected in caulking around doorways and windows with concentrations above the TSCA bulk product threshold. This is likely the primary source of PCBs contributing to the observed indoor air quality conditions in the kitchen area. PCBs have diffused at least 6 inches into adjacent porous materials¹ (grout and CMU) to concentrations that exceed risk-based standards for high-occupancy use and may serve as a secondary source of contamination.

2.2. Sensitive Receptor Evaluation

Contamination from Site sources has been evaluated for its potential to adversely affect germane sensitive receptors. Table 1 presents the potentially affected media, potential pathways, and potential receptors.

Table 1: Sensitive Receptors Evaluation

Potentially Affected Media	Potential Pathways	Sensitive Receptors	Relative Level of Risk
Indoor Air	Impact to indoor air from intrusion of contaminated soil vapor or off-	Building occupants, construction workers.	High – PCBs are present in indoor air in select locations and are being managed using high efficiency

¹ Penetration to nine inches from the caulked joint does not appear to have occurred based on the existing data set.

Potentially Affected Media	Potential Pathways	Sensitive Receptors	Relative Level of Risk
	gassing of PCB-containing building materials.		particulate air (carbon) filters.

Using the Vermont Agency of Natural Resources (ANR) Natural Resources Atlas, a qualitative receptor analysis was completed to evaluate the occurrence of potential receptors relative to the Site.

2.2.1. Drinking Water Supplies

Four private drinking water wells are mapped on the Site: WRN# 53, 54, 55, and 423 (Tag# 1348). Fourteen private drinking water wells are mapped within one quarter mile of the Site: Tag# 1637, 12225, 37801, 39265, 56347, 64769, 400068, and WRN# 40, 48, 68, 172, 263, 266, and 333.

Drinking water is not expected to be impacted from PCBs in indoor air and building materials.

2.2.2. Surface Water and Groundwater Source Protection Areas

The Winooski River abuts the Site to the south; a small tributary flows into the river in the southeastern corner of the Site. Barnes Brook lies approximately 0.25 miles west of the Site. Surface water is not expected to be impacted from PCBs in indoor air and building materials.

No groundwater source protection areas are located within one quarter mile of the Site.

2.2.3. Buildings with Basements

The Site building does not have a basement. Information concerning nearby properties is not readily available, but it is likely nearby residences to the west possess basements. The risk of vapor intrusion of PCBs into nearby buildings is relatively low, since there has not been a documented release of PCBs to the soil or groundwater at the Site.

2.2.4. Wetlands

Within 0.25 miles of the Site, wetlands are mapped to the northeast, northwest, and southwest along the banks of the Winooski River.

2.2.5. Sensitive Ecological Areas

The forested portion of the Site is a deer wintering habitat. An uncommon plant is located approximately 0.15 miles southwest of the Site along the banks of the Winooski River. No other sensitive ecological areas were identified within one quarter mile of the Site.

2.2.6. Rare, Threatened, and Endangered Species

A rare animal is mapped within the northeastern corner of the Site. No threatened or endangered species are mapped within a one quarter mile radius of the Site.

2.2.7. Adjoining Landowners

Property owners adjoining the Site are summarized in Table 2, below, and will be notified of proposed corrective actions in accordance with § 35-607(b)(1) of the IRule.

Table 2: Adjoining Landowners

Owner	Address/ Description	SPAN Number	Contact Information
KITCHEN DAVID A KITCHEN SARAH T	438 GALLISON HILL RD, MONTPELIER	405-126-10206	438 GALLISON HILL RD, MONTPELIER, VT, 05602
CANSECO ROBERTO G	825 GALLISON HILL RD, MONTPELIER	405-126-10464	PO BOX 122, EAST MONTPELIER, VT, 05651
COOPER MAUREEN R	894 GALLISON HILL RD, MONTPELIER	405-126-10733	894 GALLISON HILL RD, MONTPELIER, VT, 05602
DUCAS MARCEL R DUCAS JOANNE	717 GALLISON HILL RD, MONTPELIER	405-126-10898	5010 VT RTE 12, MONTPELIER, VT, 05602
CURRIER DANIEL CURRIER CHRISTINA	737 GALLISON HILL RD, MONTPELIER	405-126-11424	737 GALLISON HILL RD, MONTPELIER, VT, 05602
MCGUIGGAN JOHN MCGUIGGAN WENDY	795 GALLISON HILL RD, MONTPELIER	405-126-11459	795 GALLISON HILL RD, MONTPELIER, VT, 05602
KELLY PAMELA M	809 GALLISON HILL RD, MONTPELIER	405-126-11629	809 GALLISON HILL RD, MONTPELIER, VT, 05602
BYERLY ERIN L BYERLY DUSTIN J	841 GALLISON HILL RD, MONTPELIER	405-126-11800	841 GALLISON HILL RD, MONTPELIER, VT, 05602
MCKINSTRY LAURA A	753 GALLISON HILL RD, MONTPELIER	405-126-12035	91 SPRING ST, NORTHFIELD, VT, 05663-5695
NOSEK HOWARD	857 GALLISON HILL RD, MONTPELIER	405-126-12392	857 GALLISON HILL RD, MONTPELIER, VT, 05602
CARSWELL CARRIE A	775 GALLISON HILL RD, MONTPELIER	405-126-12507	775 GALLISON HILL RD, MONTPELIER, VT, 05602
SEGALE NATHAN	671 GALLISON HILL RD, MONTPELIER	405-126-12948	671 GALLISON HILL RD, MONTPELIER, VT, 05602
GARDNER SETH B	628 CODLING RD, EAST MONTPELIER	195-062-10191	440 SNOW HILL RD, EAST MONTPELIER, VT, 05651
HEITMANN PETER LIFE ESTATE	1105 GALLISON HILL RD, EAST MONTPELIER	195-062-10476	1105 GALLISON HILL RD, MONTPELIER, VT, 05602
MARTIN BRUCE MARTIN ANNE	1236 GALLISON HILL RD, EAST MONTPELIER	195-062-10800	1236 GALLISON HILL RD, MONTPELIER, VT, 05602

3. Corrective Action Plan

This section describes the recommended design elements for PCB contaminated building material removal. This cleanup plan has been prepared as a CAP in accordance with the VT DEC IRule and 40 CFR § 761.62. Disturbance of contaminated building materials shall not commence until approval of this CAP by the VT DEC.

A TSCA cleanup and disposal plan is not required for removal and disposal of PCB-containing building materials as PCBs are present in bulk product at the Site. If a release of PCBs is identified during confirmatory sampling, a TSCA cleanup and disposal plan will be prepared.

3.1. Performance Standards

Corrective action objectives described within this CAP are designed to prevent exposure to the following known exposure pathways:

1. Prevent direct contact with PCB-contaminated building materials, and
2. Prevent the inhalation risk of PCBs in indoor air.

Corrective actions will be performed by contractors under the supervision of a Qualified Environmental professional (QEP).

3.1.1. Relevant Regulatory Criteria

3.1.1.1. TSCA

PCBs are regulated by the EPA under 40 CFR Part 761, under the authority of TSCA. PCBs are present at concentrations ≥ 50 mg/kg in caulk and adjacent building materials in the kitchen/preparation area, requiring removal and disposal as a PCB bulk product waste in accordance with 40 CFR §761.62. As landfilling is proposed, PCB bulk product waste will be managed according to 40 CFR §761.62(b)(1)(i).

3.1.1.2. Vermont PCB School Action Levels

PCBs in indoor air are regulated by Vermont in school buildings. Within the Site building, PCBs are present in indoor air above the Grade 7 to Adult School Action Limit of $0.1 \mu\text{g}/\text{m}^3$. Within the kitchen/preparation area, PCBs concentrations ranged from 0.013 to $0.045 \mu\text{g}/\text{m}^3$, below the applicable SAL, during fall and spring indoor air sampling events. PCBs have likely volatilized from building materials in a school building, constituting a release under the IRule.

3.1.2. Corrective Action Objectives

Based on future unrestricted high occupancy use of the Site building, corrective actions must achieve the following objectives:

1. Abatement of building materials containing PCBs at concentrations ≥ 1.0 mg/kg.

3.2. Permits

The following permits are required for the implementation of the CAP:

- City of Montpelier Permits
 - Development Application
 - Building Permit Attachment

3.3. Redevelopment and Reuse Plan

U-32 is planning to renovate the kitchen/preparation area as part of a planned 2027 capital improvement project. The current renovation plan is shown on Figure 3 in Appendix A. Renovation will include demolishing walls containing doorways, interior windows, and openings with PCB-containing caulk at concentrations greater than 50 mg/kg.

3.4. Pre-Construction

The abatement contractor will be solicited through a competitive bid process. Stone will assist WCUSD with contractor procurement by developing bid specifications, responding to Requests for Information (RFI), attending one site walk for bidders, reviewing bids, and attending planning meetings with the selected contractor.

3.5. Contaminated Building Materials Abatement

PCB-containing caulk, adjacent doors or interior windows, and 9 inches of adjacent porous material (CMU and grout) will be removed and disposed of as PCB bulk product as described in Section 3.6. The abatement will address three door openings approximately 3'X6', 2 door openings approximately 8'X8', one door opening approximately 6'X6', and one interior window opening approximately 5'X4' (Figure 7). Specifications for abatement will be detailed in a design document to be drafted by the contractor selected for abatement.

A work area and exclusion zone shall be established to prevent the spread of PCB-contamination from the work area. The work area shall be enveloped by polyethylene walls and ceiling taped to staging or other framework. The exclusion zone shall consist of polyethylene sheeting laid on the ground outside of the work area and shall be used by personnel cutting building materials to don, remove, and contain protective coveralls and decontamination equipment. No equipment shall leave the exclusion zone without being decontaminated. If equipment enters the exclusion zone from outside (clean zone) it shall be considered contaminated.

Wet saws shall be used to minimize the amount of dust generated by building material removal. Cutting shall be performed by enough staff such that work can be performed safely and cuttings, dust, and wet-saw water can be contained using a dedicated wet/dry vacuum. Liquids generated during cutting shall be contained in Department of Transportation (DOT) approved 55-gallon drums.

Following completion of cutting, equipment shall be decontaminated within a tray located in the exclusion zone by a phosphate-free detergent scrub, followed by rinsing with potable water, and cleaned with a d-limonene based solvent (MyCELX or equivalent). Decontamination liquids will be transferred to a 55-gallon drum. Cutting and decontamination fluids will be sampled and analyzed for PCBs by EPA Method 8082 for waste disposal characterization.

Following removal, confirmation samples will be collected to evaluate for the presence of PCB remediation wastes (i.e., porous masonry above 1.0 mg/kg). If confirmation results illustrate that PCB concentrations

exceed the 1.0 mg/kg high occupancy walk-away criteria, further remediation will be performed to achieve the desired action level under a Performance-Based Cleanup (40 CFR §761.61(b)).

3.6. Waste Management

PCB bulk product waste generated during abatement will include PCB-containing caulk, doors or window assemblies, and associated porous masonry and grout. Based on anticipated wall thickness of 8 inches, the estimated quantity of material to be removed is approximately 8 cubic yards (12 tons). Final container sizing will be based on these estimated quantities.

PCB bulk product waste will be contained in DOT-approved, leak-tight containers. Containers will be transported by a licensed hazardous waste transporter to a facility approved to receive PCB bulk product waste in accordance with 40 CFR §761.62(b). Prior to disposal, a waste characterization sample will be collected to determine if PCBs can leach from the waste at concentrations greater than or equal to 10 micrograms per liter (ug/L).

If abatement of PCB remediation waste is necessary, waste will be disposed of at a Subtitle C landfill under 40 CFR §761.61(b). A waste stream sample will be required to determine if the VT01 hazardous waste code is required.

Other remediation derived wastes include decontamination fluids from sampling, polyethylene sheeting, personal protective equipment (PPE), and sampling consumables. Decontamination fluids will be contained in appropriately sized, USDOT-approved, labeled containers for characterization and disposal according to their chemical constituency. Polyethylene sheeting will be disposed of along with PCB bulk product. PPE and sample collection consumables will be disposed of as solid waste.

3.7. Site Restoration

Following completion of abatement and cleanup verification activities, WCUSD will restore the affected door and interior window openings to their previous configuration, as practical. Restoration will include rebuilding or repairing the openings and associated wall finishes so that the openings are returned to a condition consistent with their pre-abatement use and appearance.

3.8. Quality Assurance/Quality Control (QA/QC)

Sample collection and data management activities will be performed in accordance with Stone's Standard Operation Procedures (SOPs) which are available upon request:

- SEI-4.2.8: Chain of Custody Procedures,
- SEI-4.5.13: Data Handling, Storage, Retrieval and Error Coding
- SEI-5.1.7: Maintenance and Decontamination of Field Equipment,
- SEI-5.41.4: Handling, Collection and Transportation of Samples,
- SEI-5.64.0: Sampling Porous Surfaces for PCBs, and
- SEI-5.99.0: Procedure for Wipe Sample Collection to Assess PCB Concentrations on Material Surfaces.

3.8.1. Cleanup Verification and Confirmatory Samples

Table 3 provides a summary of proposed cleanup verification and confirmatory air samples.

Table 3: Proposed Cleanup Verification Samples

Description	Media	Number of Samples	Quality Control Samples	Analysis	Minimum Laboratory Reporting Limit
CMU	Porous	22	2 FD 2 MS/MSD	8082 w/3540C	0.50 mg/kg
Indoor Air	Air	1	1 FD 1 FB 1 AA	TO-10A	0.010 $\mu\text{g}/\text{m}^3$

Notes: FD – field duplicate; MS/MSD – matrix spike/matrix spike duplicate; FB – field blank; AA – ambient air; mg/kg – milligrams per kilogram; $\mu\text{g}/\text{m}^3$ – micrograms per cubic meter.

Stone will collect field duplicate samples at a frequency of 1/20 (5%) for each matrix. A summary of QA/QC samples and associated corrective actions is presented in Table 4, below.

Table 4: Field Quality Control Summary and Corrective Actions

QC Sample	Frequency	Acceptance Criteria	Corrective Action
Field Duplicates	5% per analyte group	Precision 50% solid and air	Assess sampling precision, qualify data
Equipment Blank	1 wipe sample per day that porous media samples collected	Accuracy/ Bias- contamination	Identify source of contamination, qualify data
Field Blank	1 per round of indoor air sampling	Accuracy/ Bias- contamination Target analytes < Quantitation Limit	Identify source of contamination, qualify data
Ambient Air	1 per round of indoor air sampling	Accuracy/ Bias- contamination	Identify source of contamination, qualify data
Cooler Temperature	NA – temperature of the coolers should be taken upon receipt at the fixed laboratory.	4°C +/- 2°C	Report to client, if > 10°C, use professional judgement to continue with the analysis

3.8.1.1. PCB-Containing Building Materials Cleanup Verification

Following removal of PCB bulk product, Stone will perform cleanup verification sampling to determine whether underlying material has been contaminated by diffusion of PCB-containing caulk and is considered PCB remediation waste (i.e. PCBs at concentrations greater than 1.0 mg/kg). One sample of CMU will be collected from each side of each opening where PCB bulk product has been removed for a total of 22 samples, plus two field duplicates.

CMU samples will be collected using a rotary hammer drill to pulverize at least 20 grams of masonry. The hammer drill will be advanced no further than 1/2-inch into the masonry to attempt to avoid significant damage to the CMU block and multiple holes may be necessary to collect the required mass. Samples will be collected in clean aluminum foil and transferred to sample containers. Sample holes will be patched with mortar following CMU sample collection.

Samples will be placed in an ice-filled cooler and transported under chain of custody procedures to Phoenix Environmental Laboratory (Phoenix) of Manchester, Connecticut for PCB analysis by EPA Method 8082

with manual Soxhlet extraction. One field duplicate and one equipment blank will be collected. The equipment blank will be collected by wiping a 100 square centimeter (cm²) portion of the equipment used to collect samples (e.g., drill bit) with a hexane wipe.

If sample results indicate that PCBs remain in building materials at concentrations greater than 1.0 mg/kg, a CAP Amendment will be drafted for VT DEC approval.

Sample identifications for building materials will be presented as follows:

XX-CV-#Z-QC

Where:

- XX is room number or name;
- CV for cleanup verification;
- # is the unique building material identifier;
- Z will be A, B, C or D to indicate which side of the opening the sample was collected; and
- QC is quality control sample code (i.e., FD: Field Duplicate), if applicable.

3.8.1.2. Indoor Air Confirmation

Following removal of all PCB-containing building materials to concentrations less than 1.0 mg/kg, one indoor air sample and one field duplicate will be collected from the kitchen/preparation area. Laboratory provided PUF cartridges will be secured to continuous flow sample pumps calibrated to an approximately 5.0 liters per minute flow rate and collected over a 24-hour period. The pumps will be placed at approximately three to four feet above the floor surface and in a location that is not expected to be disturbed. If practical, sample pumps will be placed in the center of the room. The field duplicate will be collected by deploying two sample pumps and PUF cartridges at the same location. The field blank will consist of an unopened PUF cartridge that accompanies field staff during sample deployment and retrieval. An outdoor ambient air sample will be collected upwind of the school to evaluate background PCB concentrations in air. The wind direction will be determined at the time of sample collection.

Samples will be submitted to Phoenix for PCB analysis as Aroclors by EPA Method TO-10A.

Sample identifications for indoor air will be presented as follows:

5225-###-MMDDYYYY-QC

Where:

- 5225 is the U32 school designation
- ### is the room number or name
- MMDDYYYY is the date of sample collection
- QC is quality control sample code, if applicable (e.g., FD: Field Duplicate)

3.9. Contingent Performance-Based Cleanup

Following cleanup verification sampling, if underlying building materials demonstrate PCB concentrations greater than 1.0 mg/kg, further remediation will be performed as a Performance-Based Cleanup (40 CFR §761.61(b)). Remediation will include removing an additional three inches of CMU and grout on the side of the opening where PCB remediation waste is present and repeating verification sampling until corrective action objectives are reached.

3.10. Institutional Control

No residual contamination is expected to remain in the kitchen/preparation area above applicable environmental standards. However, PCB bulk product and PCBs in indoor air remain in excess of the Grade 7 to Adult SAL in other parts of the Site building. Interim mitigation techniques (including carbon air filtration systems and/or enhanced air circulation and cleaning) are ongoing in other rooms of the building and will continue until PCB-containing materials have been abated. Corrective actions and institutional controls for other areas of the building will be detailed in a CAP under separate cover.

3.11. Health & Safety

Due to the presence of contaminated building materials at the Site, cleanup activities should be performed using appropriate health and safety precautions. Contractors selected for cleanup activities shall perform those services under the auspices of their own site-specific health and safety plan, to be developed for the project. The contractors must make their own determinations as to the appropriate level of health and safety protection required for each of the activities described in this plan. A Site-specific health and safety plan shall be submitted to the QEP.

3.12. Reporting

Following completion of cleanup activities, a Corrective Action Construction Completion Report (CACCR) will be prepared in accordance with §35-608 of the IRule and submitted to the VT DEC Sites Management Section. The completion report will include a description of Site activities including dates of work, field notes, figures, a discussion and tables of cleanup verification sample results, and recommendations for additional remedial activities, if necessary.

As mentioned in Section 3.8.1.1, if PCB remediation waste is identified during cleanup verification sampling, a CAP Amendment will be drafted for VT DEC approval, and the US EPA TSCA Division and VT DEC will be notified in writing within 30 days of the last shipment of waste off-Site in accordance with 761.61(b)(1).

3.13. Schedule

The proposed schedule for completion of the corrective actions is provided in Table 5, below, and is subject to contractor selection and input. Reporting will be completed within 45 days of completing Site activities.

Table 5: Proposed Schedule*

Task	Responsible Party	Duration	Estimated Completion Date	Deliverable
Partial CAP Review	VT DEC	4 weeks	June 2026	Posting of Partial CAP to ERT
Public Comment Period	-	30 days	July 2026	Proof of posting, comments
Revised Partial CAP	Stone	2 weeks	July 2026	Final CAP
Partial CAP Approval	VT DEC	2 weeks	August 2026	Approval Letter
Contractor Procurement	WCUSD, Stone	6 weeks	September 2026	Bid Documents
Contracting	WCUSD, Contractor	2 weeks	October 2026	Contract Documents
Abatement	TBD	2 weeks	June 2027	Field Notes
Cleanup Verification Sampling	Stone	1 day	July 2027	Building Material Samples
Laboratory Analysis	Analytical Lab	2 weeks	July 2027	Laboratory Results
Indoor Air Confirmation Sampling	Stone	2 days	July 2027	Air Samples
Laboratory Analysis	Analytical Lab	2 weeks	August 2027	Laboratory Results
CACCR	Stone	45 days	September 2027	CACCR

*The proposed schedule assumes that PCB remediation waste is not identified in cleanup samples and that performance-based cleanup is not warranted.

3.14. Proposed Contractors/Subcontractors

Potential contractors are summarized in Table 6, below.

Table 6: Proposed Contractors

Address	Contact	Title	Phone	Email
Corrective Action Planning, Oversight, Cleanup Verification, and Reporting: Stone Environmental, Inc.				
535 Stone Cutters Way Montpelier, VT 05602	Jennifer Cypher	Senior Scientist, Quality Assurance Manager	603-306-2877	jcypher@stone-env.com
PCB Bulk Product Abatement				
Prism Response LLC, dba Alloy 50 Concord Street North Reading, MA 01864	Brenton D. Morgenstern	Senior Sales Estimator	978-265-1470	bmorgenstern@alloygroup.com
EnviroVantage 629 Calef Highway (Rt. 125) Epping, NH 03042	Aaron Demand	VP Estimating	800-640-5323	aarond@envirovantage.com
Absolute Spill Response, LLC 21 Metro Way, Suite 7 Barre, VT 05641	Melissa Audy	General Manager	802-242-2011	mramsey@absolutespillresponse.com

Address	Contact	Title	Phone	Email
LimeLite Restoration Services, Inc. 124 Leaf Hill Drive Irasburg, VT 05845	Maureen Lehouillier	Office Coordinator	802-754-2353	maureen@limeliterestoration.com
PCB Bulk Product and Remediation Derived Waste Management				
Republic Services 280 Commerce Street Williston, VT 05495	Britney Paquette	Operations Manager - Vermont	802-498-3902	bpaquette@republicservices.com
Waste Management 122 North Main Street Concord, NH 03301	Mark Thompson	Industrial Account Manager	603-833-1559	mthomps6@wm.com
Analytical Laboratory				
Phoenix Environmental 587 East Middle Turnpike Manchester, CT 06040	Bobbi Aloisa	Vice President	860-645-8728	bobbi@phoenixlabs.com

3.15. Costs

The estimated corrective action costs are summarized in Table 7, below, and are based on professional experience and recent contractor quotes. A detailed cost estimate is provided as Appendix C. A 20% contingency has been included to account for variations in contractor bids and unforeseen circumstances.

Table 7: Partial CAP Cost Summary

Task	Professional Services	Consultants/Subcontractors	Expenses	Total
1 - Project Management	\$4,894	\$0	\$0	\$4,894
2 - Pre-Construction	\$6,485	\$0	\$38	\$6,523
3 - PCB Materials Abatement	\$6,555	\$25,922	\$372	\$32,848
4 - Cleanup Verification Sampling	\$1,741	\$2,200	\$324	\$4,265
5 - Confirmatory Indoor Air Sampling	\$1,255	\$506	\$473	\$2,233
6 - CACCR	\$7,091	\$0	\$0	\$7,091
Subtotal				\$57,854
Contingency (30%)				\$17,356
TOTAL				\$75,210

4. References

Stone Environmental, Inc., 2023. *Indoor Air Sampling Report: U32 Middle and High School, Montpelier, Vermont*, October 25, 2023.

Stone Environmental, Inc., 2024. *Quarterly Air Monitoring Report (Q1 and Q2, 2024): U32 Middle and High School, Montpelier, Vermont*, November 7, 2024.

Stone Environmental, Inc., 2024. *Supplemental Assessment of Indoor Air Quality and Building Materials, U32 Middle and High School, Montpelier, Vermont*, November 8, 2024.

Stone Environmental, Inc., 2025. *Biannual Report—Quarterly Indoor Air Monitoring, U32 Middle and High School, Montpelier, Vermont*, April 9, 2025.

Stone Environmental, Inc., 2026. *Supplemental Site Investigation of Proposed Renovation Area at U-32 Middle and High School, 930 Gallison Hill Road, East Montpelier, Vermont*, January 23, 2026.

Stone Environmental, Inc., 2026. *Evaluation of Corrective Action Alternatives for Proposed Renovation Area at U-32 Middle and High School, 930 Gallison Hill Road, East Montpelier, Vermont*, Revised April 23.

Vermont Department of Environmental Conservation, 2024. *Investigation and Remediation of Contaminated Properties Rule*, effective February 23.

Appendix A: Figures

Figure 1: Location Map

Figure 2: Vicinity Map

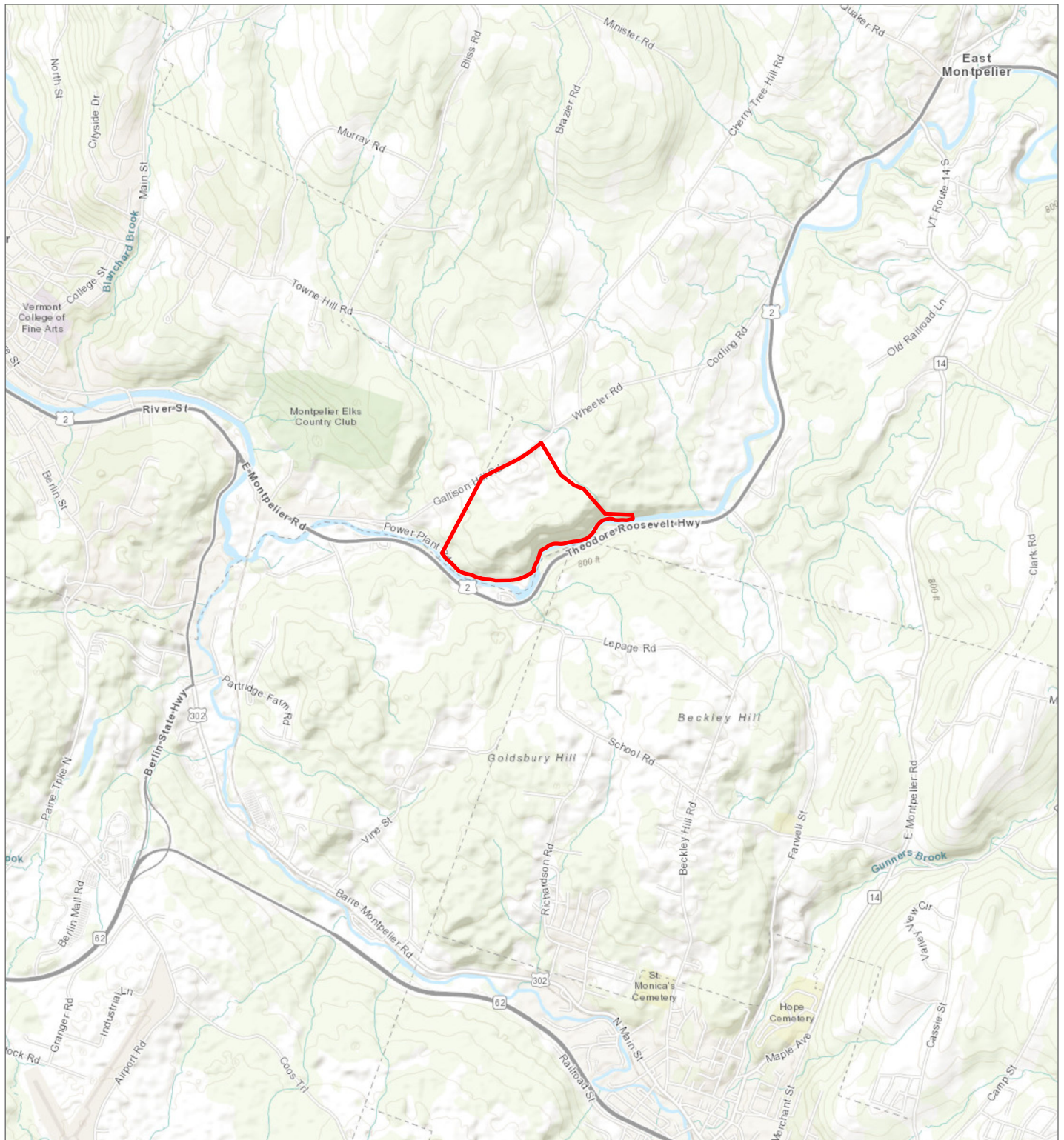
Figure 3: Renovation Plan

Figure 4: PCB Concentrations in Kitchen Building Materials – Supplemental Assessments

Figure 5: Quarterly and Biannual Air Sampling Results

Figure 6: PCB Concentrations in Kitchen Masonry Samples – Supplemental Site Investigation

Figure 7: PCB Abatement and Cleanup Verification Plan



LEGEND

Site Boundary



0 1,000 2,000
Feet



Figure 1: Location Map

U32 Middle and High School

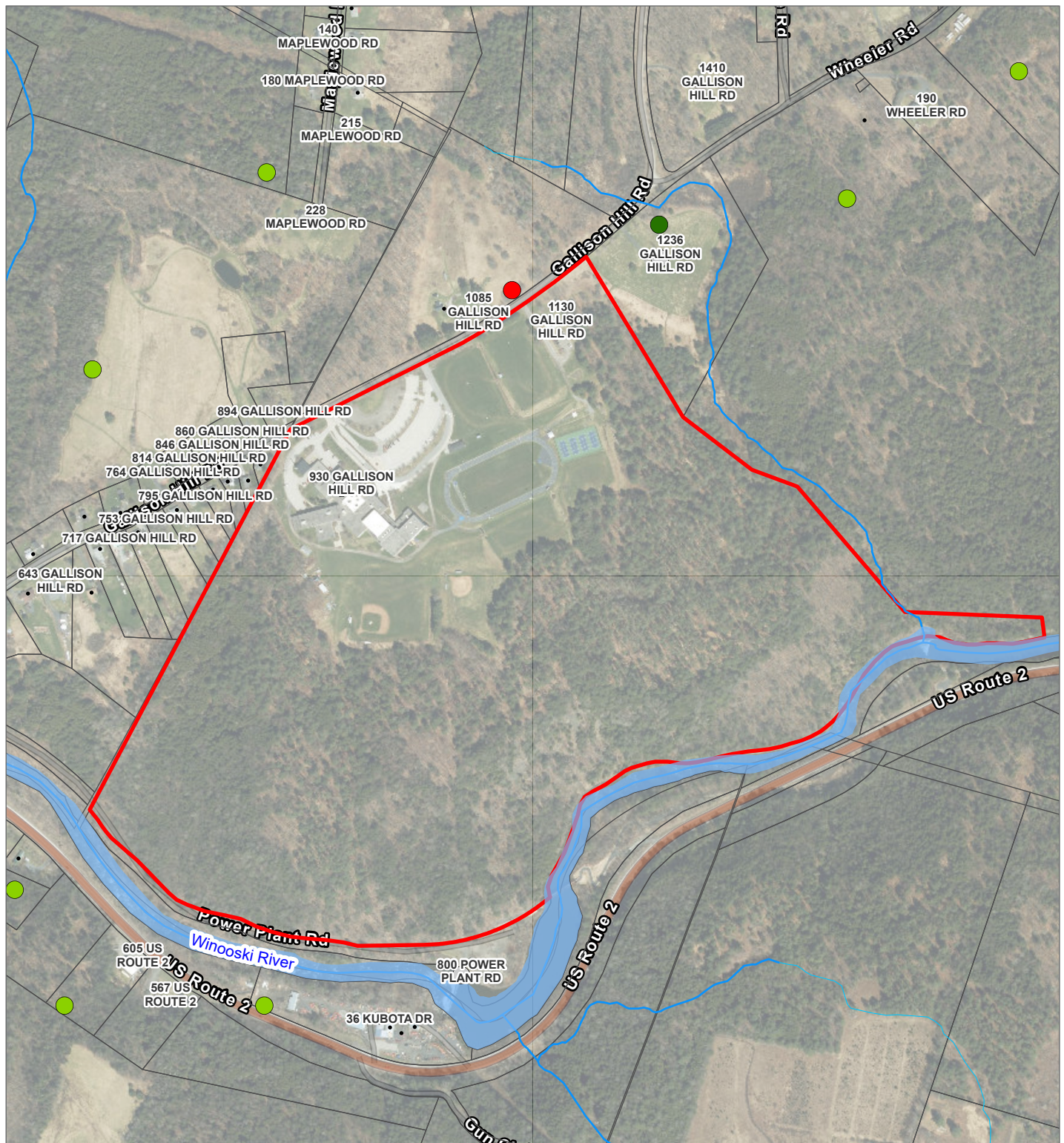
Prepared for
WCUSD



STONE ENVIRONMENTAL

Source: Esri World Topography, VCG

Path: O:\PROJ-23\EAR\20231031 U32 UHS\GIS\20231031 U32\20231031 U32.aprx Figure 1 Site
LocationExported: 12/18/2023 2:34 PM by Irajnak



LEGEND

- | | |
|-----------------------------------|------------------|
| Parcel Boundary | screen digitized |
| Site Boundary | E911 Address |
| Rivers | Unknown |
| VT Significant Wetlands Inventory | Streams |
| Private Wells | Intermittent |
| GPS Location | Perennial |

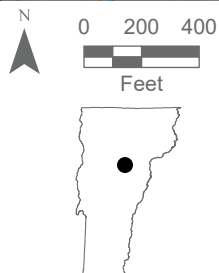


Figure 2: Vicinity Map

U32 Middle and High School

Prepared for

STONE ENVIRONMENTAL

Source: Esri World Topography, VCGI

Path: O:\PROJ-23\EAR\20231031 U32 UHS\GIS\20231031 U32\20231031 U32.aprx Figure 2 - Vicinity
MapExported: 5/9/2024 10:32 AM by Irajnak

File: O:\PROJ-23\YEAR\20231031 U32 UHS\Data\AutoCAD\20231031 U32 School.dwg

DRAWING CREDITS

#	Date	Drwn	Chk'd	App'd	Description
1	02/13/2026	SYR			Drawn On: 02/13/2026
	02/14/2026	JLC			Drawn By: SYR
					Checked On: 02/14/2026
					Checked By: JLC
					Project No.: 20231031

DRAWING SCALE

Not to Scale



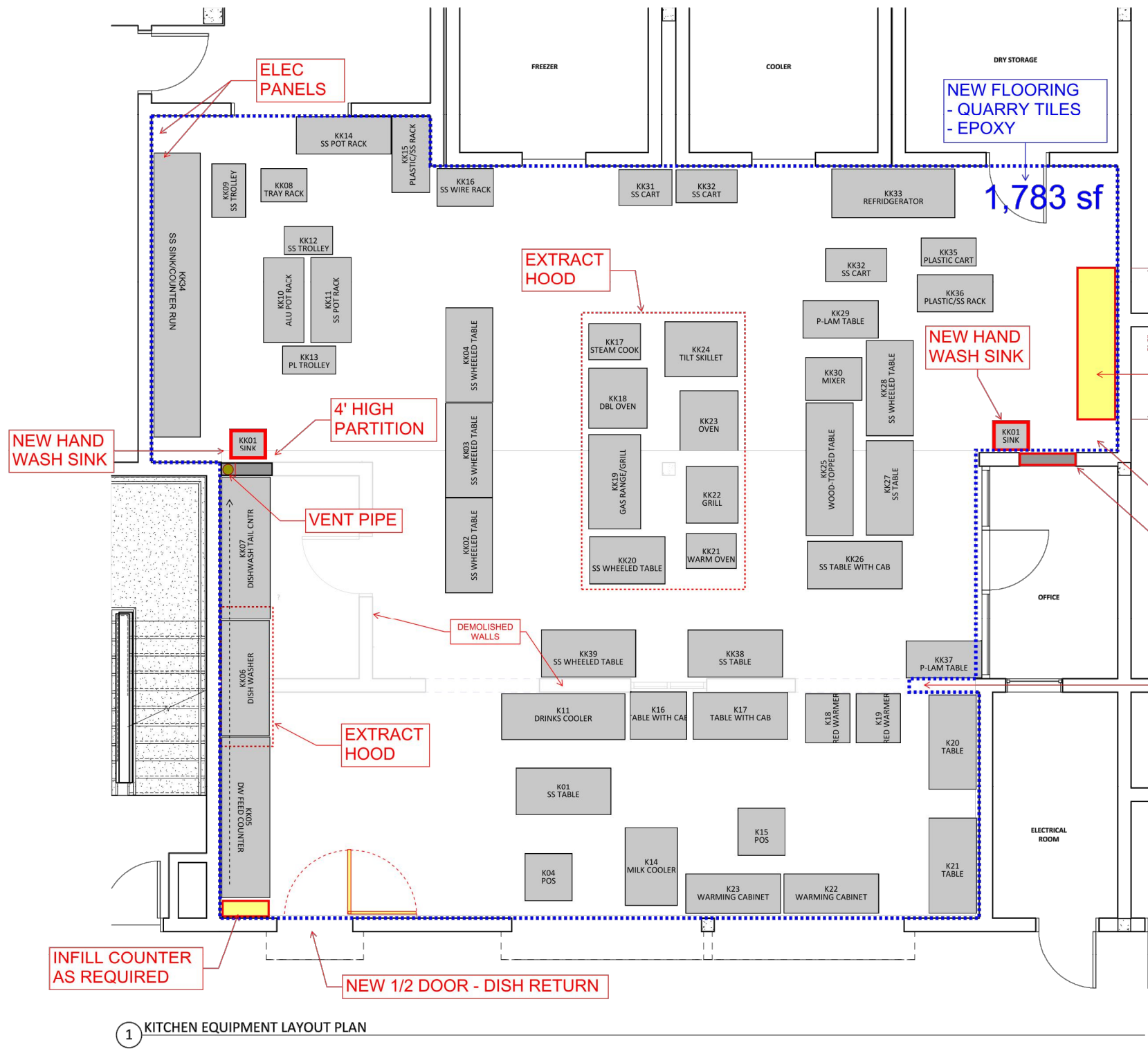
STONE ENVIRONMENTAL

535 Stone Cutters Way / Montpelier / VT / 05602 / USA
802.229.4541 / info@stone-env.com / www.stone-env.com

RENOVATION PLAN - KITCHEN/PREPARATION AREA
U32 HIGH SCHOOL
930 GALLISON HILL ROAD
MONTPELIER VERMONT

FIGURE NO.

3

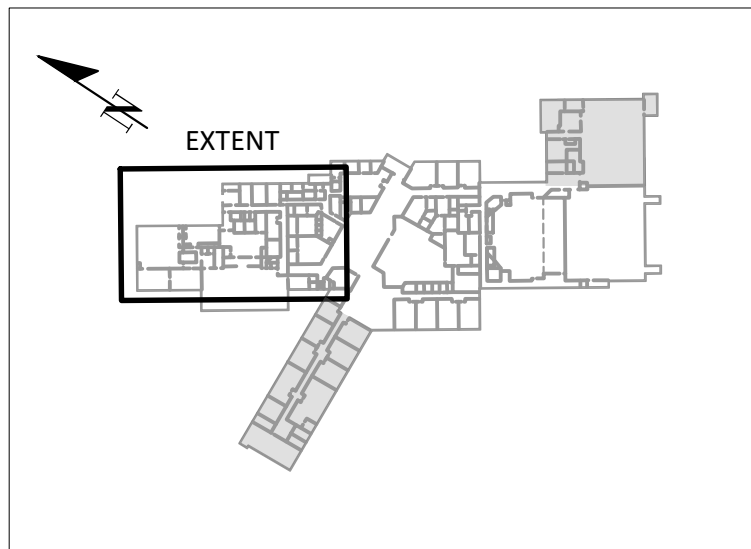


2025-07-23 - NOTES:

- MOVE 3 BAY SINK TO LEFT SIDE.
- NEW 2 BAY FOOD PREP SINK ON RIGHT SIDE.
- (2) NEW HANDWASH SINKS.
- DEMO THE STORAGE ROOM ON LEFT AND ...
- INSTALL NEW DISHWASHER ARRANGEMENT.
- ASSUME NO WORK TO CEILING OR LIGHTS IN MAIN KITCHEN.
- NEW CEILING AND LIGHTS IN SERVICE AREA.

- "MOVEABLE" ITEMS PUSHED OUT OF THE WAY BUT NOT YET MOVED TO FINAL POSITIONS.

Source: Black River Design, May 15, 2025



Notes :

Sample ID Example:
CAFEA-CK-1A

Sample ID Material Type:

Sample ID Suffix:
Indicates a unique building material type (1,2,3, etc.).

Note: room number and replicate letter A, B, C are omitted from figure for display purposes

Total PCBs displayed

Red results indicate an exceedence of the enforcement standard

Bold results indicate detections of the analyte

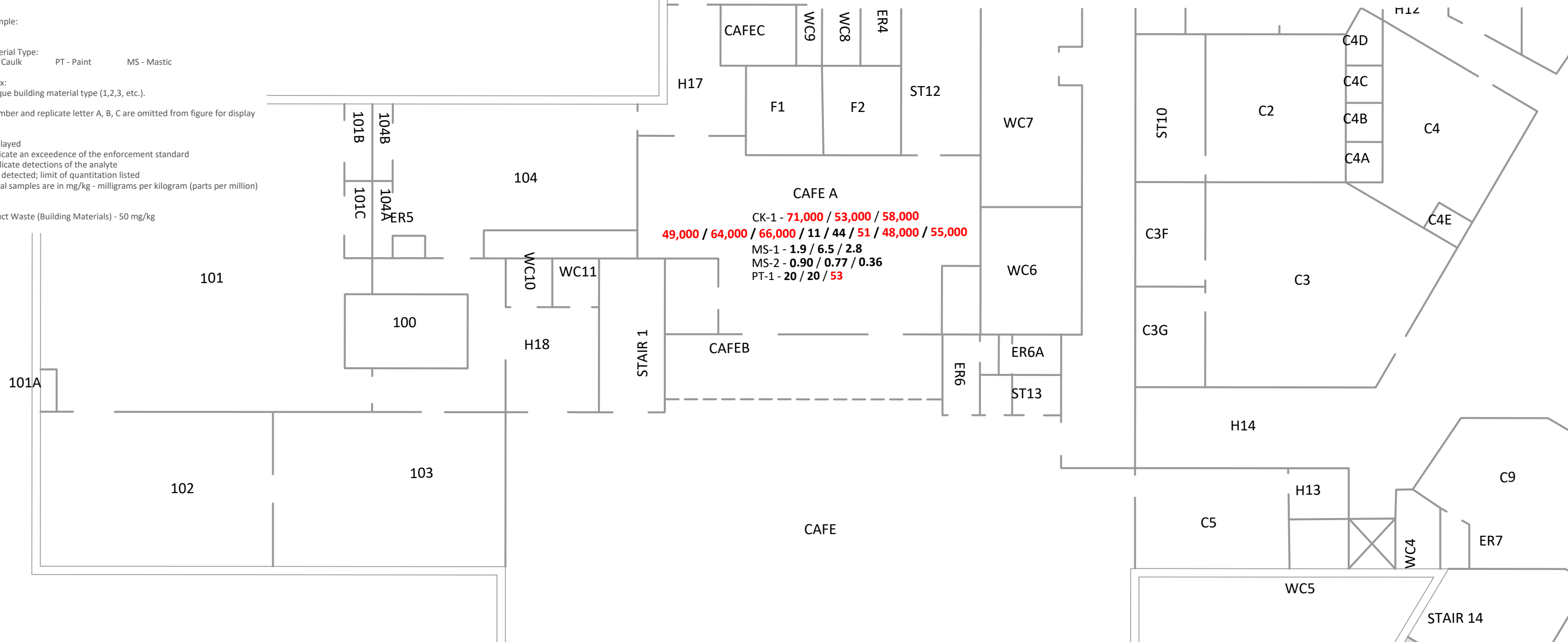
U - Analyte not detected; limit of quantitation listed

Building material samples are in mg/kg - milligrams per kilogram (parts per million)

TSCA:

Bulk Product Waste (Building Materials) - 50 mg/kg

Sample ID	Description	Location	Result (mg/kg)
CAFEA-CK-1A	Gray	Doorway leading in to CAFÉ B	71,000
CAFEA-CK-1B	Gray	Doorway around opening to serving area	53,000
CAFEA-CK-1C	Gray	Doorway to ST12	58,000
CAFEA-CK-1D	Gray	Doorway to H17	49,000
CAFEA-CK-1E	Gray	Doorway to H17	64,000
CAFEA-CK-1F	Gray	Doorway to H17	66,000
CAFEA-CK-1G	Gray, different shade from other sampled caulk	Above sink	11
CAFEA-CK-1H	Brownish gray outer layer covering light gray caulk	Corner of room	44
CAFEA-CK-1I	Brownish gray outer layer covering light gray caulk	Corner of room	51
CAFEA-CK-1J	Gray	Doorway around office in kitchen	48,000
CAFEA-CK-1K	Gray	Window into office	55,000



	#	Date	Drwn	Chk'd	App'd	Description
Drawn On: 5/15/26						
Drawn By: SYR						
Checked On: 5/18/26						
Checked By: JLC						
Project No.: 20231031						

DRAWING SCALE



STONE ENVIRONMENTAL

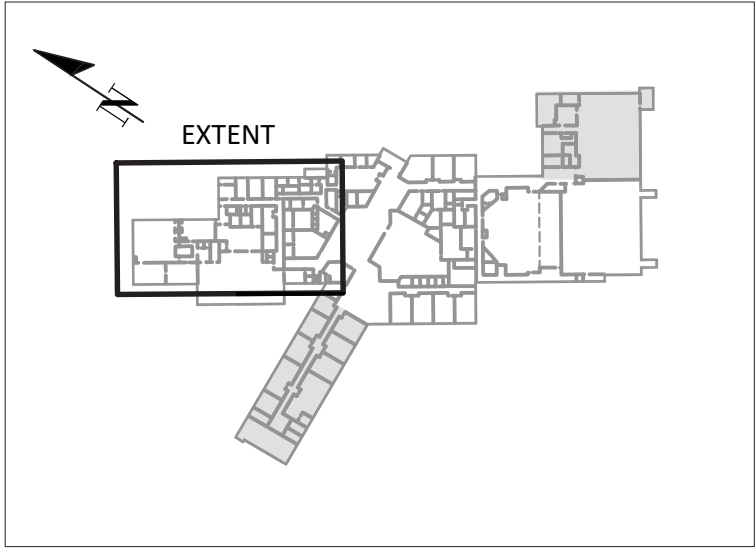
535 Stone Cutters Way / Montpelier / VT / 05602 / USA
802.229.4541 / info@stone-env.com / www.stone-env.com

PCB CONCENTRATIONS IN KITCHEN BUILDING MATERIALS
SUPPLEMENTAL ASSESSMENTS - U32 HIGH SCHOOL
930 GALLISON HILL ROAD

MONTPELIER VERMONT

LOOK NO:

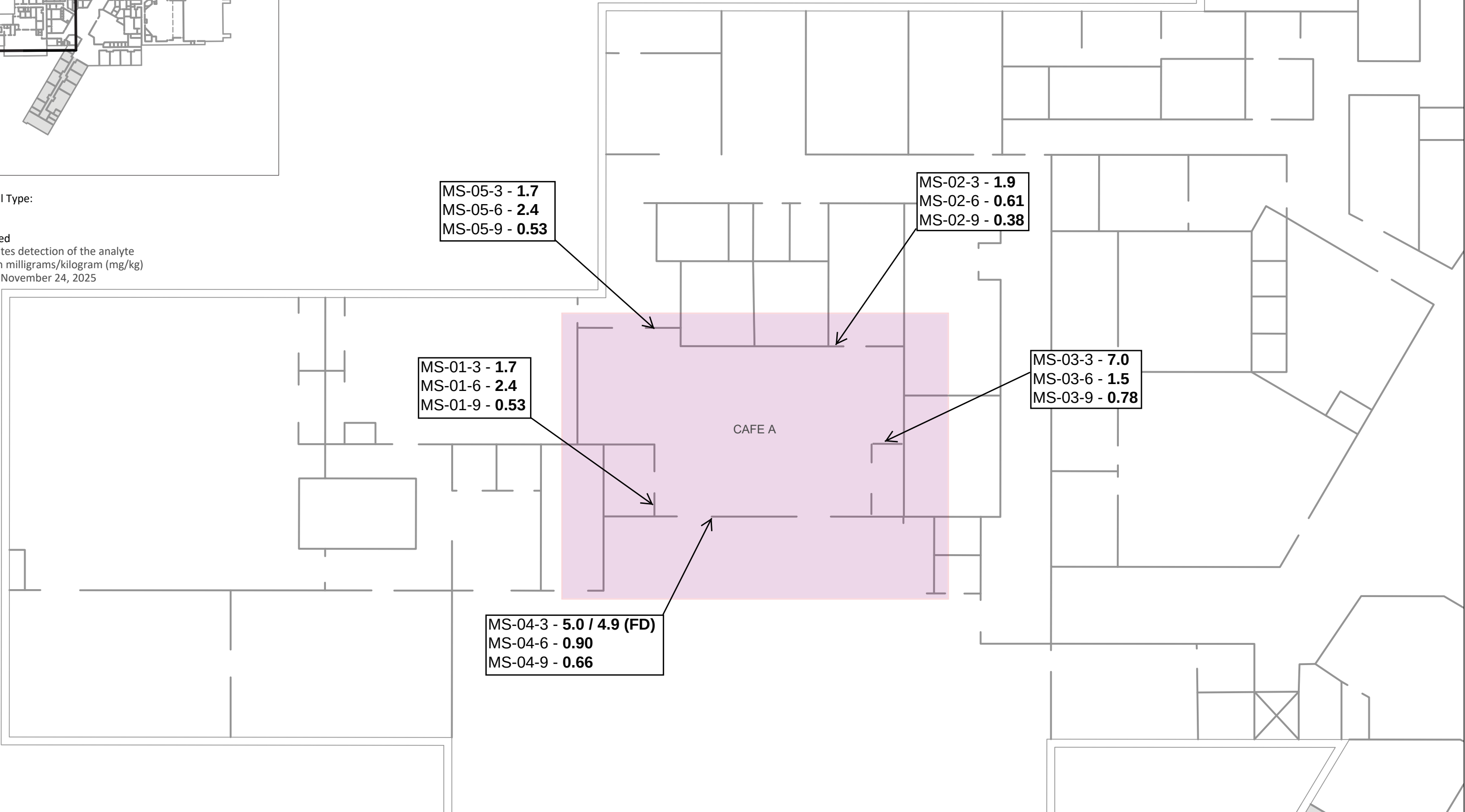
4



LEGEND
Renovation Area

Notes :
Sample ID Material Type:
MS - Masonry

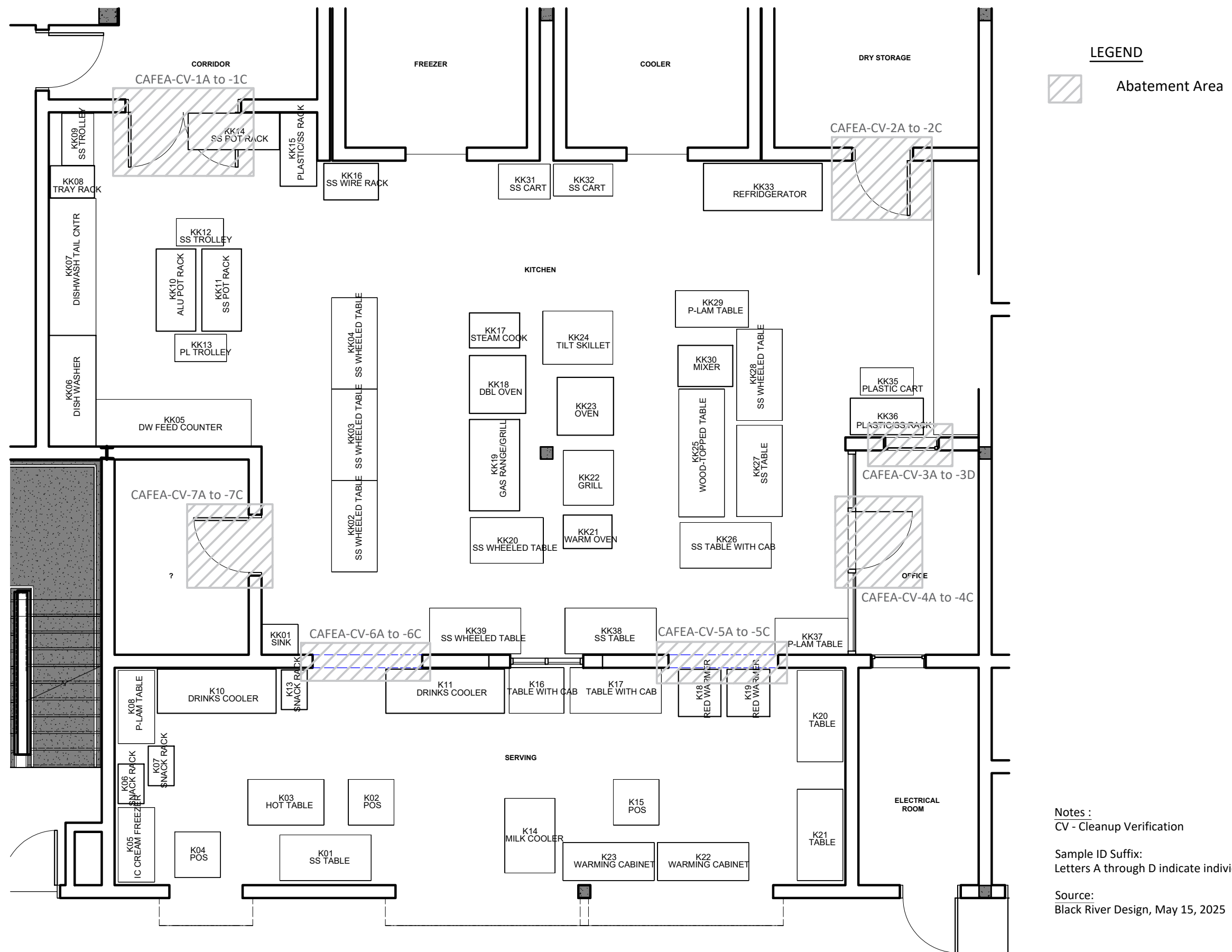
Total PCBs displayed
Bold results indicates detection of the analyte
Results reported in milligrams/kilogram (mg/kg)
Samples collected November 24, 2025



File: O:\PROJ\23\YEAR\20231031 U32 UHS\Data\AutoCAD\20231031 U32 School.dwg

DRAWING CREDITS	#	Date	Drwn	Chk'd	App'd	Description
REVISIONS						
DRAWING SCALE						





Appendix B: Data Tables

Table B-1:
2023 Indoor Air Sampling - Group #3
Polychlorinated Biphenyls Analytical Results - Indoor Air

Group #3															
Sample ID		RAL	SAL - pre-K	SAL - K-6	SAL - 7-Adult	5225-101		5225-201		5225-34		5225-37		5225-ER7	5225-GARAGE
Sample Date	CAS#					8/25/2023	Q	8/26/2023	Q	8/25/2023	Q	8/25/2023	Q	8/25/2023	8/25/2023
		(µg/m3)	(µg/m3)	(µg/m3)	(µg/m3)										
Aroclor 1016	12674-11-2	0.0225	0.03	0.06	0.1	0.0070 U		0.0073 U		0.0076 U		0.0070 U		0.0070 U	0.0071 U
Aroclor 1221	11104-28-2	0.0225	0.03	0.06	0.1	0.085		0.031		0.080		0.099		0.057	0.069
Aroclor 1232	11141-16-5	0.0225	0.03	0.06	0.1	0.0070 U		0.0073 U		0.0076 U		0.0070 U		0.0070 U	0.0071 U
Aroclor 1242	53469-21-9	0.0225	0.03	0.06	0.1	0.0070 U		0.0073 U		0.0076 U		0.0070 U		0.0070 U	0.0071 U
Aroclor 1248	12672-29-6	0.0225	0.03	0.06	0.1	0.029		0.0080		0.014		0.022		0.054	0.033
Aroclor 1254	11097-69-1	0.0225	0.03	0.06	0.1	0.0070 U		0.0073 U		0.0076 U		0.0070 U		0.0070 U	0.0071 U
Aroclor 1260	11096-82-5	0.0225	0.03	0.06	0.1	0.0070 U		0.0073 U		0.0076 U		0.0070 U		0.0070 U	0.0071 U
Aroclor 1262	37324-23-5	0.0225	0.03	0.06	0.1	0.0070 U		0.0073 U		0.0076 U		0.0070 U		0.0070 U	0.0071 U
Aroclor 1268	11100-14-4	0.0225	0.03	0.06	0.1	0.0070 U		0.0073 U		0.0076 U		0.0070 U		0.0070 U	0.0071 U
Total PCBs	1336-36-3	0.0225	0.03	0.06	0.1	0.114		0.039		0.094		0.121		0.111	0.102
Sample ID		RAL	SAL - pre-K	SAL - K-6	SAL - 7-Adult	5225-GYM		5225-ST12		5225-WC201					
Sample Date	CAS#					8/25/2023	Q	8/25/2023	Q	8/25/2023	Q				
		(µg/m3)	(µg/m3)	(µg/m3)	(µg/m3)										
Aroclor 1016	12674-11-2	0.0225	0.03	0.06	0.1	0.0070 U		0.0071 U		0.0075 U					
Aroclor 1221	11104-28-2	0.0225	0.03	0.06	0.1	0.031		0.054		0.050					
Aroclor 1232	11141-16-5	0.0225	0.03	0.06	0.1	0.0070 U		0.0071 U		0.0075 U					
Aroclor 1242	53469-21-9	0.0225	0.03	0.06	0.1	0.0070 U		0.0071 U		0.0075 U					
Aroclor 1248	12672-29-6	0.0225	0.03	0.06	0.1	0.011		0.063		0.015					
Aroclor 1254	11097-69-1	0.0225	0.03	0.06	0.1	0.0070 U		0.0071 U		0.0075 U					
Aroclor 1260	11096-82-5	0.0225	0.03	0.06	0.1	0.0070 U		0.0071 U		0.0075 U					
Aroclor 1262	37324-23-5	0.0225	0.03	0.06	0.1	0.0070 U		0.0071 U		0.0075 U					
Aroclor 1268	11100-14-4	0.0225	0.03	0.06	0.1	0.0070 U		0.0071 U		0.0075 U					
Total PCBs	1336-36-3	0.0225	0.03	0.06	0.1	0.042		0.117		0.065					

Table B-2:
2024 Supplemental Assessment
PCB Concentrations in Indoor Air - Confirmation Air Assessment

Group #1											
Sample ID		SAL - 7-Adult	5225-CAFEC		5225-CAFEC- LD		5225-33		5225-33-DUP1		5225-35
Sample Date	CAS#		3/1/2024	Q	3/1/2024	Q	6/25/2024	Q	6/25/2024	Q	6/25/2024
		(µg/m3)									
Aroclor 1016	12674-11-2	0.1	0.0075	U	0.0063	U	0.015	U	0.015	U	0.0078
Aroclor 1221	11104-28-2	0.1	0.022		0.0063	U	0.17		0.16		0.063
Aroclor 1232	11141-16-5	0.1	0.0075	U	0.0063	U	0.015	U	0.015	U	0.0078
Aroclor 1242	53469-21-9	0.1	0.0075	U	0.0063	U	0.015	U	0.015	U	0.0078
Aroclor 1248	12672-29-6	0.1	0.015		0.0063	U	0.036		0.038		0.022
Aroclor 1254	11097-69-1	0.1	0.0075	U	0.0074		0.015	U	0.015	U	0.0078
Aroclor 1260	11096-82-5	0.1	0.0075	U	0.0063	U	0.015	U	0.015	U	0.0078
Aroclor 1262	37324-23-5	0.1	0.0075	U	0.0063	U	0.015	U	0.015	U	0.0078
Aroclor 1268	11100-14-4	0.1	0.0075	U	0.0063	U	0.015	U	0.015	U	0.0078
Total PCBs	1336-36-3	0.1	0.037		0.0074		0.21		0.20		0.085
Group #3											
Sample ID		SAL - 7-Adult	5225-101		5225-102		5225-104		5225-106		5225-200
Sample Date	CAS#		6/25/2024	Q	2/29/2024	Q	2/29/2024	Q	2/29/2024	Q	3/1/2024
		(µg/m3)									
Aroclor 1016	12674-11-2	0.1	0.0077	U	0.0074	U	0.0074	U	0.0074	U	0.0063
Aroclor 1221	11104-28-2	0.1	0.012		0.024		0.028		0.0074	U	0.0063
Aroclor 1232	11141-16-5	0.1	0.0077	U	0.0074	U	0.0074	U	0.0074	U	0.0063
Aroclor 1242	53469-21-9	0.1	0.0077	U	0.0074	U	0.0074	U	0.0074	U	0.0063
Aroclor 1248	12672-29-6	0.1	0.0089		0.0074	U	0.012		0.0074	U	0.0063
Aroclor 1254	11097-69-1	0.1	0.0077	U	0.015		0.0074	U	0.0074	U	0.025
Aroclor 1260	11096-82-5	0.1	0.0077	U	0.0074	U	0.0074	U	0.0074	U	0.0063
Aroclor 1262	37324-23-5	0.1	0.0077	U	0.0074	U	0.0074	U	0.0074	U	0.0063
Aroclor 1268	11100-14-4	0.1	0.0077	U	0.0074	U	0.0074	U	0.0074	U	0.0063
Total PCBs	1336-36-3	0.1	0.021		0.039		0.040		0.0074	U	0.025
Sample ID		SAL - 7-Adult	5225-37		5225-C7		5225-C8		5225-CAFEA		5225-103
Sample Date	CAS#		6/25/2024	Q	2/29/2024	Q	2/29/2024	Q	2/29/2024	Q	8/15/2024
		(µg/m3)									
Aroclor 1016	12674-11-2	0.1	0.0078	U	0.0072	U	0.0073	U	0.0073	U	0.0078
Aroclor 1221	11104-28-2	0.1	0.051		0.034		0.012		0.021		0.054
Aroclor 1232	11141-16-5	0.1	0.0078	U	0.0072	U	0.0073	U	0.0073	U	0.0078
Aroclor 1242	53469-21-9	0.1	0.0078	U	0.0072	U	0.0073	U	0.0073	U	0.0078
Aroclor 1248	12672-29-6	0.1	0.025		0.019		0.011		0.024		0.038
Aroclor 1254	11097-69-1	0.1	0.0078	U	0.0072	U	0.0073	U	0.0073	U	0.0078
Aroclor 1260	11096-82-5	0.1	0.0078	U	0.0072	U	0.0073	U	0.0073	U	0.0078
Aroclor 1262	37324-23-5	0.1	0.0078	U	0.0072	U	0.0073	U	0.0073	U	0.0078
Aroclor 1268	11100-14-4	0.1	0.0078	U	0.0072	U	0.0073	U	0.0073	U	0.0078
Total PCBs	1336-36-3	0.1	0.076		0.053		0.023		0.045		0.092

Table B-2:
2024 Supplemental Assessment
PCB Concentrations in Indoor Air - Confirmation Air Assessment

QC Samples											
Sample ID		SAL - 7-Adult	5225-AMB		5225-FB						
Sample Date	CAS#	6/25/2024	Q	6/25/2024	Q						
		(µg/m3)									
Aroclor 1016	12674-11-2	0.1	0.0077 U	0.050 U							
Aroclor 1221	11104-28-2	0.1	0.0077 U	0.050 U							
Aroclor 1232	11141-16-5	0.1	0.0077 U	0.050 U							
Aroclor 1242	53469-21-9	0.1	0.0077 U	0.050 U							
Aroclor 1248	12672-29-6	0.1	0.0077 U	0.050 U							
Aroclor 1254	11097-69-1	0.1	0.0077 U	0.050 U							
Aroclor 1260	11096-82-5	0.1	0.0077 U	0.050 U							
Aroclor 1262	37324-23-5	0.1	0.0077 U	0.050 U							
Aroclor 1268	11100-14-4	0.1	0.0077 U	0.050 U							
Total PCBs	1336-36-3	0.1	0.0077 U	0.050 U							

Key:
 SAL - 7-Adult - Vermont School Action Limits for Seventh Grade to Adult age groups
 RPD - Relative percent difference (%)
 ug/m³ - micrograms per cubic meter
 U - Analyte was not detected, laboratory reporting limit provided
 Q - laboratory result qualifier
Bold results indicate detections of the analyte
 Shaded results indicate an exceedance of the SAL 7-Adult enforcement standard

Table B-3:
2024 Supplemental Assessment
PCB Concentrations in Group 3 Building Materials

Sample ID		TSCA PCB Bulk Product Waste	37-AD-1A		37-AD-1B		37-AD-1C		37-CT-1A		37-CT-1B		37-CT-1C	
Sample Date	CAS#		1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.15 U		0.15 U		1.5 U		0.16 U		0.16 U		0.16 U	
PCB-1221	11104-28-2	50	0.15 U		0.15 U		1.5 U		0.16 U		0.16 U		0.16 U	
PCB-1232	11141-16-5	50	0.15 U		1.1		1.5 U		0.16 U		0.16 U		0.16 U	
PCB-1242	53469-21-9	50	0.15 U		0.15 U		1.5 U		0.16 U		0.16 U		0.16 U	
PCB-1248	12672-29-6	50	0.15 U		0.15 U		1.5 U		0.16 U		0.16 U		0.16 U	
PCB-1254	11097-69-1	50	1.8		0.15 U		1.9		0.47		0.45		0.63	
PCB-1260	11096-82-5	50	0.15 U		0.15 U		1.5 U		0.16 U		0.16 U		0.16 U	
PCB-1262	37324-23-5	50	0.15 U		0.15 U		1.5 U		0.16 U		0.16 U		0.16 U	
PCB-1268	11100-14-4	50	0.15 U		0.15 U		1.5 U		0.16 U		0.16 U		0.16 U	
Total PCBs	1336-36-3	50	1.8		1.1		1.9		0.47		0.45		0.63	
Sample ID		TSCA PCB Bulk Product Waste	37-FP-1A		37-FP-1B		37-FP-1C		37-MS-1A		37-MS-1A-FD		37-MS-1B	
Sample Date	CAS#		1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	7.9 U		24 U		2.7 U		0.13 U		0.18 U		0.074 U	
PCB-1221	11104-28-2	50	7.9 U		24 U		2.7 U		0.13 U		0.18 U		0.074 U	
PCB-1232	11141-16-5	50	7.9 U		24 U		2.7 U		0.13 U		0.18 U		0.074 U	
PCB-1242	53469-21-9	50	7.9 U		24 U		2.7 U		0.13 U		0.18 U		0.074 U	
PCB-1248	12672-29-6	50	7.9 U		24 U		2.7 U		0.13 U		0.18 U		0.074 U	
PCB-1254	11097-69-1	50	7.9 U		24 U		2.7 U		0.13 U		0.18 U		0.10	
PCB-1260	11096-82-5	50	25		28		37		0.13 U		0.18 U		0.074 U	
PCB-1262	37324-23-5	50	7.9 U		24 U		2.7 U		0.13 U		0.18 U		0.074 U	
PCB-1268	11100-14-4	50	7.9 U		24 U		2.7 U		0.13 U		0.18 U		0.074 U	
Total PCBs	1336-36-3	50	25		28		37		0.13 U		0.18 U		0.10	
Sample ID		TSCA PCB Bulk Product Waste	37-MS-1C		37-PT-1A		37-PT-1B		37-PT-1C		37-SL-1A		37-SL-1B	
Sample Date	CAS#		1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.24 U		1.7 U		0.77 U		1.6 U		3.8 U		2.3 U	
PCB-1221	11104-28-2	50	0.24 U		1.7 U		0.77 U		1.6 U		3.8 U		2.3 U	
PCB-1232	11141-16-5	50	0.24 U		6.0		0.77 U		8.5		3.8 U		2.3 U	
PCB-1242	53469-21-9	50	0.24 U		1.7 U		0.77 U		1.6 U		3.8 U		2.3 U	
PCB-1248	12672-29-6	50	0.24 U		1.7 U		0.77 U		1.6 U		3.8 U		2.3 U	
PCB-1254	11097-69-1	50	0.44		1.7 U		4.3		1.6 U		3.8 U		2.3 U	
PCB-1260	11096-82-5	50	0.24 U		1.7 U		0.77 U		1.6 U		3.8 U		2.3 U	
PCB-1262	37324-23-5	50	0.24 U		1.7 U		0.77 U		1.6 U		3.8 U		2.3 U	
PCB-1268	11100-14-4	50	0.24 U		1.7 U		0.77 U		1.6 U		3.8 U		2.3 U	
Total PCBs	1336-36-3	50	0.44		6.0		4.3		8.5		3.8 U		2.3 U	
Sample ID		TSCA PCB Bulk Product Waste	37-SL-1C											
Sample Date	CAS#		1/30/2024	Q										
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.22 U											
PCB-1221	11104-28-2	50	0.22 U											
PCB-1232	11141-16-5	50	0.22 U											
PCB-1242	53469-21-9	50	0.22 U											
PCB-1248	12672-29-6	50	0.22 U											
PCB-1254	11097-69-1	50	0.22 U											
PCB-1260	11096-82-5	50	0.22 U											
PCB-1262	37324-23-5	50	0.22 U											
PCB-1268	11100-14-4	50	0.22 U											
Total PCBs	1336-36-3	50	0.22 U											
Sample ID		TSCA PCB Bulk Product Waste	40-CK-1A		40-CK-1B		40-CK-1C		40-CK-2A		40-CK-2B		40-CK-2C	
Sample Date	CAS#		2/1/2024	Q	2/1/2024	Q	2/1/2024	Q	2/1/2024	Q	2/1/2024	Q	2/1/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U	
PCB-1221	11104-28-2	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U	
PCB-1232	11141-16-5	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U	
PCB-1242	53469-21-9	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U	
PCB-1248	12672-29-6	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U	
PCB-1254	11097-69-1	50	1.4		0.90		1.4 *		0.10 U		0.62		2.5	
PCB-1260	11096-82-5	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U	
PCB-1262	37324-23-5	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U	
PCB-1268	11100-14-4	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U	
Total PCBs	1336-36-3	50	1.4		0.90		1.4 *		0.10 U		0.62		2.5	

Table B-3:
2024 Supplemental Assessment
PCB Concentrations in Group 3 Building Materials

Sample ID		TSCA PCB Bulk Product Waste	40-CK-2C-FD		40-FP-1A		40-FP-1B		40-FP-1C		40-SL-1A		40-SL-1B	
Sample Date	CAS#		2/1/2024	Q	2/1/2024	Q	2/1/2024	Q	2/1/2024	Q	2/1/2024	Q	2/1/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.10 U		0.10 U		28 U		23 U		1.0 U		1.0 U	
PCB-1221	11104-28-2	50	0.10 U		0.10 U		28 U		23 U		1.0 U		1.0 U	
PCB-1232	11141-16-5	50	0.10 U		0.10 U		28 U		23 U		1.0 U		1.0 U	
PCB-1242	53469-21-9	50	0.10 U		0.10 U		28 U		23 U		1.0 U		1.0 U	
PCB-1248	12672-29-6	50	0.10 U		0.10 U		28 U		23 U		1.0 U		1.0 U	
PCB-1254	11097-69-1	50	2.9		0.10 U		28 U		23 U		1.0 U		1.0 U	
PCB-1260	11096-82-5	50	0.10 U		25		39		24		1.0 U		1.0 U	
PCB-1262	37324-23-5	50	0.10 U		0.10 U		28 U		23 U		1.0 U		1.0 U	
PCB-1268	11100-14-4	50	0.10 U		0.10 U		28 U		23 U		1.0 U		1.0 U	
Total PCBs	1336-36-3	50	2.9		25		39		24		1.0 U		1.0 U	
Sample ID		TSCA PCB Bulk Product Waste	40-SL-1C		RPD									
Sample Date	CAS#		2/1/2024	Q	(40-CK-2C)									
		(mg/Kg)												
PCB-1016	12674-11-2	50	1.0 U		-									
PCB-1221	11104-28-2	50	1.0 U		-									
PCB-1232	11141-16-5	50	1.0 U		-									
PCB-1242	53469-21-9	50	1.0 U		-									
PCB-1248	12672-29-6	50	1.0 U		-									
PCB-1254	11097-69-1	50	1.0 U		15%									
PCB-1260	11096-82-5	50	1.0 U		-									
PCB-1262	37324-23-5	50	1.0 U		-									
PCB-1268	11100-14-4	50	1.0 U		-									
Total PCBs	1336-36-3	50	1.0 U		15%									
Sample ID		TSCA PCB Bulk Product Waste	101-AD-1A		101-AD-1B		101-AD-1C		101-CK-1A		101-PT-1A		101-PT-1B	
Sample Date	CAS#		1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.30 U		0.45 U		0.37 U		0.038 U		2.4 U		2.5 U	
PCB-1221	11104-28-2	50	0.30 U		0.45 U		0.37 U		0.038 U		2.4 U		2.5 U	
PCB-1232	11141-16-5	50	0.30 U		0.45 U		0.37 U		0.038 U		2.4 U		2.5 U	
PCB-1242	53469-21-9	50	0.30 U		0.45 U		0.37 U		0.038 U		2.4 U		2.5 U	
PCB-1248	12672-29-6	50	0.30 U		0.45 U		0.37 U		0.038 U		2.4 U		2.5 U	
PCB-1254	11097-69-1	50	2.5		1.2		2.1		0.069		6.2		7.9	
PCB-1260	11096-82-5	50	0.30 U		0.45 U		0.37 U		0.038 U		2.4 U		2.5 U	
PCB-1262	37324-23-5	50	0.30 U		0.45 U		0.37 U		0.038 U		2.4 U		2.5 U	
PCB-1268	11100-14-4	50	0.30 U		0.45 U		0.37 U		0.038 U		2.4 U		2.5 U	
Total PCBs	1336-36-3	50	2.5		1.2		2.1		0.069		6.2		7.9	
Sample ID		TSCA PCB Bulk Product Waste	101-PT-1C		101-FP-1A		101-FP-1B		101-FP-1C		101-SL-1A		101-SL-1B	
Sample Date	CAS#		1/29/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	2.1 U		17 U		1.6 U		7.7 U		3.8 U		1.5 U	
PCB-1221	11104-28-2	50	2.1 U		17 U		1.6 U		7.7 U		3.8 U		1.5 U	
PCB-1232	11141-16-5	50	2.1 U		17 U		1.6 U		7.7 U		3.8 U		1.5 U	
PCB-1242	53469-21-9	50	2.1 U		17 U		1.6 U		7.7 U		3.8 U		1.5 U	
PCB-1248	12672-29-6	50	2.1 U		17 U		1.6 U		7.7 U		3.8 U		1.5 U	
PCB-1254	11097-69-1	50	5.1		17 U		1.6 U		7.7 U		3.8 U		1.5 U	
PCB-1260	11096-82-5	50	2.1 U		19		13		8.6		3.8 U		4.2	
PCB-1262	37324-23-5	50	2.1 U		17 U		1.6 U		7.7 U		3.8 U		1.5 U	
PCB-1268	11100-14-4	50	2.1 U		17 U		1.6 U		7.7 U		3.8 U		1.5 U	
Total PCBs	1336-36-3	50	5.1		19		13		8.6		3.8 U		4.2	
Sample ID		TSCA PCB Bulk Product Waste	102-AD-1A		102-CK-1A		102-PT-1A		102-PT-1B		102-PT-1C		102-PT-1C-FD	
Sample Date	CAS#		1/29/2024	Q	1/30/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.38 U		0.83 U		2.5 U		2.1 U		1.4 U		2.8 U	
PCB-1221	11104-28-2	50	0.38 U		0.83 U		2.5 U		2.1 U		1.4 U		2.8 U	
PCB-1232	11141-16-5	50	0.38 U		0.83 U		2.5 U		2.1 U		1.4 U		2.8 U	
PCB-1242	53469-21-9	50	0.38 U		0.83 U		2.5 U		2.1 U		1.4 U		2.8 U	
PCB-1248	12672-29-6	50	0.38 U		0.83 U		2.5 U		2.1 U		1.4 U		2.8 U	
PCB-1254	11097-69-1	50	5.6		4.4		13		17		17		19	
PCB-1260	11096-82-5	50	0.38 U		0.83 U		2.5 U		2.1 U		1.4 U		2.8 U	
PCB-1262	37324-23-5	50	0.38 U		0.83 U		2.5 U		2.1 U		1.4 U		2.8 U	
PCB-1268	11100-14-4	50	0.38 U		0.83 U		2.5 U		2.1 U		1.4 U		2.8 U	
Total PCBs	1336-36-3	50	5.6		4.4		13		17		17		19	

Table B-3:
2024 Supplemental Assessment
PCB Concentrations in Group 3 Building Materials

Sample ID		TSCA PCB Bulk Product Waste	102-FP-1A		102-FP-1B		102-FP-1B-FD		102-FP-1C		102-SL-1A		102-SL-1B	
Sample Date	CAS#		1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/29/2024	Q	1/29/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	1.6 U		14 U		16 U		1.6 U		1.6 U		8.4 U	
PCB-1221	11104-28-2	50	1.6 U		14 U		16 U		1.6 U		1.6 U		8.4 U	
PCB-1232	11141-16-5	50	1.6 U		14 U		16 U		1.6 U		1.6 U		8.4 U	
PCB-1242	53469-21-9	50	1.6 U		14 U		16 U		1.6 U		1.6 U		8.4 U	
PCB-1248	12672-29-6	50	1.6 U		14 U		16 U		1.6 U		1.6 U		8.4 U	
PCB-1254	11097-69-1	50	1.6 U		14 U		16 U		1.6 U		21		57	
PCB-1260	11096-82-5	50	8.4		22		40		16		1.6 U		8.4 U	
PCB-1262	37324-23-5	50	1.6 U		14 U		16 U		1.6 U		1.6 U		8.4 U	
PCB-1268	11100-14-4	50	1.6 U		14 U		16 U		1.6 U		1.6 U		8.4 U	
Total PCBs	1336-36-3	50	8.4		22		40		16		21		57	
Sample ID		TSCA PCB Bulk Product Waste	102-SL-1C		RPD (102-PT-1C)		RPD (102-FP-1B)							
Sample Date	CAS#		1/29/2024	Q										
		(mg/Kg)												
PCB-1016	12674-11-2	50	3.8 U		-		-							
PCB-1221	11104-28-2	50	3.8 U		-		-							
PCB-1232	11141-16-5	50	3.8 U		-		-							
PCB-1242	53469-21-9	50	3.8 U		-		-							
PCB-1248	12672-29-6	50	3.8 U		-		-							
PCB-1254	11097-69-1	50	52		11%		-							
PCB-1260	11096-82-5	50	3.8 U		-		58%							
PCB-1262	37324-23-5	50	3.8 U		-		-							
PCB-1268	11100-14-4	50	3.8 U		-		-							
Total PCBs	1336-36-3	50	52		11%		58%							
Sample ID		TSCA PCB Bulk Product Waste	104-CK-1A		104-CK-1B		104-CK-1C		104-CT-1A		104-CT-1B		104-CT-1C	
Sample Date	CAS#		1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	5.0 U		8.1 U		1.8 U		0.36 U		0.22 U		0.34 U	
PCB-1221	11104-28-2	50	5.0 U		8.1 U		1.8 U		0.36 U		0.22 U		0.34 U	
PCB-1232	11141-16-5	50	5.0 U		8.1 U		1.8 U		0.36 U		0.22 U		0.34 U	
PCB-1242	53469-21-9	50	5.0 U		8.1 U		1.8 U		0.36 U		0.22 U		0.34 U	
PCB-1248	12672-29-6	50	5.0 U		8.1 U		1.8 U		0.36 U		0.22 U		0.34 U	
PCB-1254	11097-69-1	50	16		56		11		0.49		0.43		0.34 U	
PCB-1260	11096-82-5	50	5.0 U		8.1 U		1.8 U		0.36 U		0.22 U		0.42	
PCB-1262	37324-23-5	50	5.0 U		8.1 U		1.8 U		0.36 U		0.22 U		0.34 U	
PCB-1268	11100-14-4	50	5.0 U		8.1 U		1.8 U		0.36 U		0.22 U		0.34 U	
Total PCBs	1336-36-3	50	16		56		11		0.49		0.43		0.42	
Sample ID		TSCA PCB Bulk Product Waste	104A-CT-1A											
Sample Date	CAS#		1/29/2024	Q										
		(mg/Kg)												
PCB-1016	12674-11-2	50	2.3 U											
PCB-1221	11104-28-2	50	2.3 U											
PCB-1232	11141-16-5	50	2.3 U											
PCB-1242	53469-21-9	50	2.3 U											
PCB-1248	12672-29-6	50	2.3 U											
PCB-1254	11097-69-1	50	12											
PCB-1260	11096-82-5	50	2.3 U											
PCB-1262	37324-23-5	50	2.3 U											
PCB-1268	11100-14-4	50	2.3 U											
Total PCBs	1336-36-3	50	12											
Sample ID		TSCA PCB Bulk Product Waste	104B-CT-1A											
Sample Date	CAS#		1/29/2024	Q										
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.20 U											
PCB-1221	11104-28-2	50	0.20 U											
PCB-1232	11141-16-5	50	0.20 U											
PCB-1242	53469-21-9	50	0.20 U											
PCB-1248	12672-29-6	50	0.20 U											
PCB-1254	11097-69-1	50	0.20 U											
PCB-1260	11096-82-5	50	0.40											
PCB-1262	37324-23-5	50	0.20 U											
PCB-1268	11100-14-4	50	0.20 U											
Total PCBs	1336-36-3	50	0.40											
Sample ID		TSCA PCB Bulk Product Waste	106-AD-1A		106-AD-1B		106-AD-1C		106-CT-1A		106-CT-1B		106-CT-1C	
Sample Date	CAS#		1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q

Table B-3:
2024 Supplemental Assessment
PCB Concentrations in Group 3 Building Materials

		(mg/Kg)										
PCB-1016	12674-11-2	50	0.38 U	0.32 U	0.27 U	0.21 U	0.24 U	0.19 U				
PCB-1221	11104-28-2	50	0.38 U	0.32 U	0.27 U	0.21 U	0.24 U	0.19 U				
PCB-1232	11141-16-5	50	0.38 U	0.32 U	0.95	0.21 U	0.24 U	0.19 U				
PCB-1242	53469-21-9	50	0.38 U	0.32 U	0.27 U	0.21 U	0.24 U	0.19 U				
PCB-1248	12672-29-6	50	0.38 U	0.32 U	0.27 U	0.21 U	0.24 U	0.19 U				
PCB-1254	11097-69-1	50	4.8	2.7	0.27 U	0.42	0.39	0.33				
PCB-1260	11096-82-5	50	0.38 U	0.32 U	0.27 U	0.21 U	0.24 U	0.19 U				
PCB-1262	37324-23-5	50	0.38 U	0.32 U	0.27 U	0.21 U	0.24 U	0.19 U				
PCB-1268	11100-14-4	50	0.38 U	0.32 U	0.27 U	0.21 U	0.24 U	0.19 U				
Total PCBs	1336-36-3	50	4.8	2.7	0.95	0.42	0.39	0.33				

Table B-3:
2024 Supplemental Assessment
PCB Concentrations in Group 3 Building Materials

Sample ID		TSCA PCB Bulk Product Waste	106-MS-1A		106-MS-1B		106-MS-1C		106-PT-1A		106-PT-1B		106-PT-1C		
Sample Date	CAS#		1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	
		(mg/Kg)													
PCB-1016	12674-11-2	50	0.42 U		0.23 U		0.38 U		0.37 U		0.44 U		0.41 U		
PCB-1221	11104-28-2	50	0.42 U		0.23 U		0.38 U		0.37 U		0.44 U		0.41 U		
PCB-1232	11141-16-5	50	1.5		0.70		0.38 U		0.37 U		0.44 U		0.41 U		
PCB-1242	53469-21-9	50	0.42 U		0.23 U		0.38 U		0.37 U		0.44 U		0.41 U		
PCB-1248	12672-29-6	50	0.42 U		0.23 U		0.38 U		0.37 U		0.44 U		0.41 U		
PCB-1254	11097-69-1	50	0.42 U		0.23 U		1.2		2.6		2.2		1.7		
PCB-1260	11096-82-5	50	0.42 U		0.23 U		0.38 U		0.37 U		0.44 U		0.41 U		
PCB-1262	37324-23-5	50	0.42 U		0.23 U		0.38 U		0.37 U		0.44 U		0.41 U		
PCB-1268	11100-14-4	50	0.42 U		0.23 U		0.38 U		0.37 U		0.44 U		0.41 U		
Total PCBs	1336-36-3	50	1.5		0.70		1.2		2.6		2.2		1.7		
Sample ID		TSCA PCB Bulk Product Waste	200-AD-1A		200-AD-1B		200-AD-1C		200-AD-2A		200-AD-2B		200-CK-1A		
Sample Date	CAS#		1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	
		(mg/Kg)													
PCB-1016	12674-11-2	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		2300 U		
PCB-1221	11104-28-2	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		2300 U		
PCB-1232	11141-16-5	50	0.10 U		0.10 *U		0.10 *U		0.10 *U		0.10 U		2300 U		
PCB-1242	53469-21-9	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		2300 U		
PCB-1248	12672-29-6	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		2300 U		
PCB-1254	11097-69-1	50	3.8		6.6 *		5.4 *		11 *		0.10 U		11000		
PCB-1260	11096-82-5	50	0.10 U		0.10 *U		0.10 *U		0.10 *U		10		2300 U		
PCB-1262	37324-23-5	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		2300 U		
PCB-1268	11100-14-4	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		2300 U		
Total PCBs	1336-36-3	50	3.8		6.6		5.4		11		10		11000		
Sample ID		TSCA PCB Bulk Product Waste	200-CK-1A-FD		200-CK-1B		200-CK-1C		200-FP-1A		200-FP-1B		200-FP-1C		RPD (200-CK-1A)
Sample Date	CAS#		1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	
		(mg/Kg)													
PCB-1016	12674-11-2	50	4200 U		3600 U		0.10 U		31 U		19 U		1.9 U	-	
PCB-1221	11104-28-2	50	4200 U		3600 U		0.10 U		31 U		19 U		1.9 U	-	
PCB-1232	11141-16-5	50	4200 U		3600 U		0.10 *U		31 U		19 U		1.9 U	-	
PCB-1242	53469-21-9	50	4200 U		3600 U		0.10 U		31 U		19 U		1.9 U	-	
PCB-1248	12672-29-6	50	4200 U		3600 U		0.10 U		31 U		19 U		1.9 U	-	
PCB-1254	11097-69-1	50	20000		13000		22 *		31 U		19 U		1.9 U	58%	
PCB-1260	11096-82-5	50	4200 U		3600 U		0.10 *U		210		110		14	-	
PCB-1262	37324-23-5	50	4200 U		3600 U		0.10 U		31 U		19 U		1.9 U	-	
PCB-1268	11100-14-4	50	4200 U		3600 U		0.10 U		31 U		19 U		1.9 U	-	
Total PCBs	1336-36-3	50	20000		13000		22		210		110		14	58%	
Sample ID		TSCA PCB Bulk Product Waste	C7-CK-1A		C7-CK-1B		C7-CK-1C		C7-CK-2A		C7-CK-2A-FD		C7-CK-2B		
Sample Date	CAS#		1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	
		(mg/Kg)													
PCB-1016	12674-11-2	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		
PCB-1221	11104-28-2	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		
PCB-1232	11141-16-5	50	0.10 *U		0.10 *U		0.10 *U		0.10 *U		0.10 *U		0.10 *U		
PCB-1242	53469-21-9	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		
PCB-1248	12672-29-6	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		
PCB-1254	11097-69-1	50	4.4 *		6.5 *		2.2 *		24 *		13 *		18 *		
PCB-1260	11096-82-5	50	0.10 *U		0.10 *U		0.10 *U		0.10 *U		0.10 *U		0.10 *U		
PCB-1262	37324-23-5	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		
PCB-1268	11100-14-4	50	0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		0.10 U		
Total PCBs	1336-36-3	50	4.4		6.5		2.2		24		13		18		
Sample ID		TSCA PCB Bulk Product Waste	C7-CK-2C		C7-FP-1A		C7-FP-1B		C7-FP-1C		C7-PT-1A		C7-PT-1B		
Sample Date	CAS#		1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	
		(mg/Kg)													
PCB-1016	12674-11-2	50	0.10 U		0.10 U		0.10 U		22 U		0.10 U		0.10 U		
PCB-1221	11104-28-2	50	0.10 U		0.10 U		0.10 U		22 U		0.10 U		0.10 U		
PCB-1232	11141-16-5	50	0.10 *U		0.10 U		0.10 U		22 U		0.10 *U		0.10 *U		
PCB-1242	53469-21-9	50	0.10 U		0.10 U		0.10 U		22 U		0.10 U		0.10 U		
PCB-1248	12672-29-6	50	0.10 U		0.10 U		0.10 U		22 U		0.10 U		0.10 U		
PCB-1254	11097-69-1	50	34 *		0.10 U		0.10 U		22 U		69 *		9.5 *		
PCB-1260	11096-82-5	50	0.10 *U		23		32		74		0.10 *U		0.10 *U		
PCB-1262	37324-23-5	50	0.10 U		0.10 U		0.10 U		22 U		0.10 U		0.10 U		
PCB-1268	11100-14-4	50	0.10 U		0.10 U		0.10 U		22 U		0.10 U		0.10 U		
Total PCBs	1336-36-3	50	34		23		32		74		69		9.5		

Table B-3:
2024 Supplemental Assessment
PCB Concentrations in Group 3 Building Materials

Sample ID		TSCA PCB Bulk Product Waste	C7-PT-1C		RPD									
Sample Date	CAS#		1/31/2024	Q	(C7-CK-2A)									
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.10	U	-									
PCB-1221	11104-28-2	50	0.10	U	-									
PCB-1232	11141-16-5	50	0.10	*U	-									
PCB-1242	53469-21-9	50	0.10	U	-									
PCB-1248	12672-29-6	50	0.10	U	-									
PCB-1254	11097-69-1	50	7.1	*	59%									
PCB-1260	11096-82-5	50	0.10	*U	-									
PCB-1262	37324-23-5	50	0.10	U	-									
PCB-1268	11100-14-4	50	0.10	U	-									
Total PCBs	1336-36-3	50	7.1		59%									
Sample ID		TSCA PCB Bulk Product Waste	C8-AD-1A		C8-AD-1B		C8-AD-1C		C8-FP-1A		C8-FP-1A-FD		C8-FP-1B	
Sample Date	CAS#		1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.10	U	0.10	U	0.10	U	0.10	U	23	U	0.10	U
PCB-1221	11104-28-2	50	0.10	U	0.10	U	0.10	U	0.10	U	23	U	0.10	U
PCB-1232	11141-16-5	50	0.10	*U	0.10	*U	0.10	*U	0.10	U	23	U	0.10	U
PCB-1242	53469-21-9	50	0.10	U	0.10	U	0.10	U	0.10	U	23	U	0.10	U
PCB-1248	12672-29-6	50	0.10	U	0.10	U	0.10	U	0.10	U	23	U	0.10	U
PCB-1254	11097-69-1	50	2.2	*	1.8	*	2.3	*	0.10	U	23	U	0.10	U
PCB-1260	11096-82-5	50	0.10	*U	0.10	*U	0.10	*U	42		51		62	
PCB-1262	37324-23-5	50	0.10	U	0.10	U	0.10	U	0.10	U	23	U	0.10	U
PCB-1268	11100-14-4	50	0.10	U	0.10	U	0.10	U	0.10	U	23	U	0.10	U
Total PCBs	1336-36-3	50	2.2		1.8		2.3		42		51		62	
Sample ID		TSCA PCB Bulk Product Waste	C8-FP-1C		C8-MS-1A		C8-MS-1B		C8-MS-1C		RPD (C8-FP-1A)			
Sample Date	CAS#		1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q				
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.10	U	0.10	U	0.10	U	0.10	U	-			
PCB-1221	11104-28-2	50	0.10	U	0.10	U	0.10	U	0.10	U	-			
PCB-1232	11141-16-5	50	0.10	U	0.10	U	0.10	U	0.10	U	-			
PCB-1242	53469-21-9	50	0.10	U	0.10	U	0.10	U	0.10	U	-			
PCB-1248	12672-29-6	50	0.10	U	0.10	U	0.10	U	0.10	U	-			
PCB-1254	11097-69-1	50	0.10	U	0.10	U	0.10	U	0.75		-			
PCB-1260	11096-82-5	50	48		0.10	U	0.10	U	0.10	U	19%			
PCB-1262	37324-23-5	50	0.10	U	0.10	U	0.10	U	0.10	U	-			
PCB-1268	11100-14-4	50	0.10	U	0.10	U	0.10	U	0.10	U	-			
Total PCBs	1336-36-3	50	48		0.10	U	0.10	U	0.75		19%			
Sample ID		TSCA PCB Bulk Product Waste	CAFEA-CK-1A		CAFEA-CK-1B		CAFEA-CK-1C		CAFEA-MS-1A		CAFEA-MS-1B		CAFEA-MS-1C	
Sample Date	CAS#		1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	14000	U	7700	U	7600	U	0.15	U	1.6	U	1.5	U
PCB-1221	11104-28-2	50	14000	U	7700	U	7600	U	0.15	U	1.6	U	1.5	U
PCB-1232	11141-16-5	50	14000	U	7700	U	7600	U	0.15	U	1.6	U	1.5	U
PCB-1242	53469-21-9	50	14000	U	7700	U	7600	U	0.15	U	1.6	U	1.5	U
PCB-1248	12672-29-6	50	14000	U	7700	U	7600	U	0.15	U	1.6	U	1.5	U
PCB-1254	11097-69-1	50	71000		53000		58000		1.9		6.5		2.8	
PCB-1260	11096-82-5	50	14000	U	7700	U	7600	U	0.15	U	1.6	U	1.5	U
PCB-1262	37324-23-5	50	14000	U	7700	U	7600	U	0.15	U	1.6	U	1.5	U
PCB-1268	11100-14-4	50	14000	U	7700	U	7600	U	0.15	U	1.6	U	1.5	U
Total PCBs	1336-36-3	50	71000		53000		58000		1.9		6.5		2.8	
Sample ID		TSCA PCB Bulk Product Waste	CAFEA-MS-2A		CAFEA-MS-2B		CAFEA-MS-2C		CAFEA-PT-1A		CAFEA-PT-1B		CAFEA-PT-1C	
Sample Date	CAS#		1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.20	U	0.15	U	0.16	U	1.7	U	1.5	U	31	U
PCB-1221	11104-28-2	50	0.20	U	0.15	U	0.16	U	1.7	U	1.5	U	31	U
PCB-1232	11141-16-5	50	0.20	U	0.15	U	0.16	U	1.7	U	1.5	U	31	U
PCB-1242	53469-21-9	50	0.20	U	0.15	U	0.16	U	1.7	U	1.5	U	31	U
PCB-1248	12672-29-6	50	0.20	U	0.15	U	0.16	U	1.7	U	1.5	U	31	U
PCB-1254	11097-69-1	50	0.90		0.77		0.36		20		20		53	
PCB-1260	11096-82-5	50	0.20	U	0.15	U	0.16	U	1.7	U	1.5	U	31	U
PCB-1262	37324-23-5	50	0.20	U	0.15	U	0.16	U	1.7	U	1.5	U	31	U
PCB-1268	11100-14-4	50	0.20	U	0.15	U	0.16	U	1.7	U	1.5	U	31	U
Total PCBs	1336-36-3	50	0.90		0.77		0.36		20		20		53	

Table B-3:
2024 Supplemental Assessment
PCB Concentrations in Group 3 Building Materials

Sample ID		TSCA PCB Bulk Product Waste	ER4-FP-1A		ER4-FP-1B		ER4-FP-1C		ER4-PT-1A		ER4-PT-1B		ER4-PT-1C	
Sample Date	CAS#		1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	2.1 U		2.2 U		4.7 U		0.82 U		0.66 U		1.4 U	
PCB-1221	11104-28-2	50	2.1 U		2.2 U		4.7 U		0.82 U		0.66 U		1.4 U	
PCB-1232	11141-16-5	50	2.1 U		2.2 U		4.7 U		0.82 U		0.66 U		1.4 U	
PCB-1242	53469-21-9	50	2.1 U		2.2 U		4.7 U		0.82 U		0.66 U		1.4 U	
PCB-1248	12672-29-6	50	2.1 U		2.2 U		4.7 U		0.82 U		0.66 U		1.4 U	
PCB-1254	11097-69-1	50	2.1 U		2.2 U		4.7 U		1.6		3.8		1.9	
PCB-1260	11096-82-5	50	6.4		4.1		64		0.82 U		0.66 U		1.4 U	
PCB-1262	37324-23-5	50	2.1 U		2.2 U		4.7 U		0.82 U		0.66 U		1.4 U	
PCB-1268	11100-14-4	50	2.1 U		2.2 U		4.7 U		0.82 U		0.66 U		1.4 U	
Total PCBs	1336-36-3	50	6.4		4.1		64		1.6		3.8		1.9	
Sample ID		TSCA PCB Bulk Product Waste	ER6-CK-1A		ER6-CK-1B		ER6-CK-1C		ER6-CT-1A		ER6-CT-1B		ER6-CT-1B-FD	
Sample Date	CAS#		1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	25000 U		17000 U		12000 U		0.48 U		0.35 U		0.48 U	
PCB-1221	11104-28-2	50	25000 U		17000 U		12000 U		0.48 U		0.35 U		0.48 U	
PCB-1232	11141-16-5	50	25000 U		17000 U		12000 U		0.48 U		0.35 U		0.48 U	
PCB-1242	53469-21-9	50	25000 U		17000 U		12000 U		0.48 U		0.35 U		0.48 U	
PCB-1248	12672-29-6	50	25000 U		17000 U		12000 U		0.48 U		0.35 U		0.48 U	
PCB-1254	11097-69-1	50	75000		49000		51000		0.48 U		0.35 U		0.48 U	
PCB-1260	11096-82-5	50	25000 U		17000 U		12000 U		2.4		1.5		1.6	
PCB-1262	37324-23-5	50	25000 U		17000 U		12000 U		0.48 U		0.35 U		0.48 U	
PCB-1268	11100-14-4	50	25000 U		17000 U		12000 U		0.48 U		0.35 U		0.48 U	
Total PCBs	1336-36-3	50	75000		49000		51000		2.4		1.5		1.6	
Sample ID		TSCA PCB Bulk Product Waste	ER6-CT-1C		ER6-MS-1A		ER6-PT-1A		RPD		ER6-CT-1B			
Sample Date	CAS#		1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	(ER6-CT-1B)					
		(mg/Kg)												
PCB-1016	12674-11-2	50	22 U		0.45 U		9.3 U		-					
PCB-1221	11104-28-2	50	22 U		0.45 U		9.3 U		-					
PCB-1232	11141-16-5	50	22 U		0.45 U		9.3 U		-					
PCB-1242	53469-21-9	50	22 U		0.45 U		9.3 U		-					
PCB-1248	12672-29-6	50	22 U		0.45 U		9.3 U		-					
PCB-1254	11097-69-1	50	170		0.94		110		-					
PCB-1260	11096-82-5	50	22 U		0.45 U		9.3 U		6%					
PCB-1262	37324-23-5	50	22 U		0.45 U		9.3 U		-					
PCB-1268	11100-14-4	50	22 U		0.45 U		9.3 U		-					
Total PCBs	1336-36-3	50	170		0.94		110		6%					
Sample ID		TSCA PCB Bulk Product Waste	ER7-CK-1A		ER7-FP-1A		ER7-FP-1B							
Sample Date	CAS#		1/31/2024	Q	1/31/2024	Q	1/31/2024	Q						
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.10 U		22 U		25 U							
PCB-1221	11104-28-2	50	0.10 U		22 U		25 U							
PCB-1232	11141-16-5	50	0.10 *U		22 U		25 U							
PCB-1242	53469-21-9	50	0.10 U		22 U		25 U							
PCB-1248	12672-29-6	50	0.10 U		22 U		25 U							
PCB-1254	11097-69-1	50	32 *		22 U		25 U							
PCB-1260	11096-82-5	50	0.10 *U		51		31							
PCB-1262	37324-23-5	50	0.10 U		22 U		25 U							
PCB-1268	11100-14-4	50	0.10 U		22 U		25 U							
Total PCBs	1336-36-3	50	32		51		31							
Sample ID		TSCA PCB Bulk Product Waste	GARAGE-CK-1A		GARAGE-CK-1B		GARAGE-CK-1C		GARAGE-CK-2A		GARAGE-FP-1A		GARAGE-FP-1B	
Sample Date	CAS#		1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/29/2024	Q	1/29/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.10 U		10000 U		0.10 U		0.10 U		24 U		3.2 U	
PCB-1221	11104-28-2	50	0.10 U		10000 U		0.10 U		0.10 U		24 U		3.2 U	
PCB-1232	11141-16-5	50	0.10 U		10000 U		0.10 U		0.10 U		24 U		3.2 U	
PCB-1242	53469-21-9	50	0.10 U		10000 U		0.10 U		0.10 U		24 U		3.2 U	
PCB-1248	12672-29-6	50	0.10 U		10000 U		0.10 U		0.10 U		24 U		3.2 U	
PCB-1254	11097-69-1	50	4.3		56000		1.5		5.1		24 U		3.2 U	
PCB-1260	11096-82-5	50	0.10 U		10000 U		0.10 U		0.10 U		43		17	
PCB-1262	37324-23-5	50	0.10 U		10000 U		0.10 U		0.10 U		24 U		3.2 U	
PCB-1268	11100-14-4	50	0.10 U		10000 U		0.10 U		0.10 U		24 U		3.2 U	
Total PCBs	1336-36-3	50	4.3		56000		1.5		5.1		43		17	

Table B-3:
2024 Supplemental Assessment
PCB Concentrations in Group 3 Building Materials

Sample ID		TSCA PCB Bulk										
Sample Date	CAS#	Product Waste	GARAGE-FP-1C		GARAGE-PT-1A		GARAGE-PT-1A-FD		GARAGE-PT-1B		GARAGE-PT-1C	RPD
		(mg/Kg)	2/1/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	(GARAGE-PT-1A)
PCB-1016	12674-11-2	50	1.0 U		2.4 U		1.9 U		2.1 U		1.6 U	-
PCB-1221	11104-28-2	50	1.0 U		2.4 U		1.9 U		2.1 U		1.6 U	-
PCB-1232	11141-16-5	50	1.0 U		2.4 U		1.9 U		2.1 U		1.6 U	-
PCB-1242	53469-21-9	50	1.0 U		2.4 U		1.9 U		2.1 U		1.6 U	-
PCB-1248	12672-29-6	50	1.0 U		2.4 U		1.9 U		2.1 U		1.6 U	-
PCB-1254	11097-69-1	50	1.0 U		14		9.7		10		10	36%
PCB-1260	11096-82-5	50	40		2.4 U		1.9 U		2.1 U		1.6 U	-
PCB-1262	37324-23-5	50	1.0 U		2.4 U		1.9 U		2.1 U		1.6 U	-
PCB-1268	11100-14-4	50	1.0 U		2.4 U		1.9 U		2.1 U		1.6 U	-
Total PCBs	1336-36-3	50	40		14		9.7		10		10	36%
Sample ID		TSCA PCB Bulk										
Sample Date	CAS#	Product Waste	H17-CK-1A		H17-CK-1B		H17-CK-1C		H17-CK-2A			
		(mg/Kg)	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q		
PCB-1016	12674-11-2	50	1.8 U		4.3 U		3.8 U		2.1 U			
PCB-1221	11104-28-2	50	1.8 U		4.3 U		3.8 U		2.1 U			
PCB-1232	11141-16-5	50	1.8 U		4.3 U		3.8 U		2.1 U			
PCB-1242	53469-21-9	50	1.8 U		4.3 U		3.8 U		2.1 U			
PCB-1248	12672-29-6	50	1.8 U		4.3 U		3.8 U		2.1 U			
PCB-1254	11097-69-1	50	32		47		50		12			
PCB-1260	11096-82-5	50	1.8 U		4.3 U		3.8 U		2.1 U			
PCB-1262	37324-23-5	50	1.8 U		4.3 U		3.8 U		2.1 U			
PCB-1268	11100-14-4	50	1.8 U		4.3 U		3.8 U		2.1 U			
Total PCBs	1336-36-3	50	32		47		50		12			
Sample ID		TSCA PCB Bulk										
Sample Date	CAS#	Product Waste	H17-FP-1A		H17-FP-1B		H17-FP-1C		H17-FP-2A		H17-PT-1A	H17-PT-1B
		(mg/Kg)	1/29/2024	Q	2/1/2024	Q	2/1/2024	Q	1/29/2024	Q	1/29/2024	1/29/2024
PCB-1016	12674-11-2	50	0.26 U		0.10 U		1.0 U		0.46 U		3.8 U	1.9 U
PCB-1221	11104-28-2	50	0.26 U		0.10 U		1.0 U		0.46 U		3.8 U	1.9 U
PCB-1232	11141-16-5	50	0.26 U		0.10 U		1.0 U		0.46 U		3.8 U	1.9 U
PCB-1242	53469-21-9	50	0.26 U		0.10 U		1.0 U		0.46 U		3.8 U	1.9 U
PCB-1248	12672-29-6	50	0.26 U		0.10 U		1.0 U		0.46 U		3.8 U	1.9 U
PCB-1254	11097-69-1	50	1.2		0.10 U		1.0 U		0.46 U		13	21
PCB-1260	11096-82-5	50	0.26 U		6.8		61		0.46 U		3.8 U	1.9 U
PCB-1262	37324-23-5	50	0.26 U		0.10 U		1.0 U		0.46 U		3.8 U	1.9 U
PCB-1268	11100-14-4	50	0.26 U		0.10 U		1.0 U		0.46 U		3.8 U	1.9 U
Total PCBs	1336-36-3	50	1.2		6.8		61		0.46 U		13	21
Sample ID		TSCA PCB Bulk										
Sample Date	CAS#	Product Waste	H17-PT-1C		H17-PT-2A		H17-PT-2B		H17-SL-1A			
		(mg/Kg)	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q		
PCB-1016	12674-11-2	50	1.3 U		2.0 U		4.3 U		39 U			
PCB-1221	11104-28-2	50	1.3 U		2.0 U		4.3 U		39 U			
PCB-1232	11141-16-5	50	1.3 U		2.0 U		4.3 U		39 U			
PCB-1242	53469-21-9	50	1.3 U		2.0 U		4.3 U		39 U			
PCB-1248	12672-29-6	50	1.3 U		2.0 U		4.3 U		39 U			
PCB-1254	11097-69-1	50	15		20		33		39 U			
PCB-1260	11096-82-5	50	1.3 U		2.0 U		4.3 U		42			
PCB-1262	37324-23-5	50	1.3 U		2.0 U		4.3 U		39 U			
PCB-1268	11100-14-4	50	1.3 U		2.0 U		4.3 U		39 U			
Total PCBs	1336-36-3	50	15		20		33		42			
Sample ID		TSCA PCB Bulk										
Sample Date	CAS#	Product Waste	ST2-CK-1A		ST2-FP-1A		ST2-FP-1B		ST2-FP-1C		ST2-SL-1A	
		(mg/Kg)	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	
PCB-1016	12674-11-2	50	0.20 U		4.7 U		2.7 U		4.5 U		0.21 U	
PCB-1221	11104-28-2	50	0.20 U		4.7 U		2.7 U		4.5 U		0.21 U	
PCB-1232	11141-16-5	50	0.20 U		4.7 U		2.7 U		4.5 U		0.21 U	
PCB-1242	53469-21-9	50	0.20 U		4.7 U		2.7 U		4.5 U		0.21 U	
PCB-1248	12672-29-6	50	0.20 U		4.7 U		2.7 U		4.5 U		0.21 U	
PCB-1254	11097-69-1	50	0.20 U		4.7 U		2.7 U		4.5 U		0.21 U	
PCB-1260	11096-82-5	50	0.20 U		27		17		11		0.21 U	
PCB-1262	37324-23-5	50	0.20 U		4.7 U		2.7 U		4.5 U		0.21 U	
PCB-1268	11100-14-4	50	0.20 U		4.7 U		2.7 U		4.5 U		0.21 U	
Total PCBs	1336-36-3	50	0.20 U		27		17		11		0.21 U	

Table B-3:
2024 Supplemental Assessment
PCB Concentrations in Group 3 Building Materials

Sample ID		TSCA PCB Bulk Product Waste	ST3-CK-1A		ST3-FP-1A								
Sample Date	CAS#		1/30/2024	Q	1/30/2024	Q							
		(mg/Kg)											
PCB-1016	12674-11-2	50	0.44 U		24 U								
PCB-1221	11104-28-2	50	0.44 U		24 U								
PCB-1232	11141-16-5	50	0.44 U		24 U								
PCB-1242	53469-21-9	50	0.44 U		24 U								
PCB-1248	12672-29-6	50	0.44 U		24 U								
PCB-1254	11097-69-1	50	1.2		24 U								
PCB-1260	11096-82-5	50	0.44 U		39								
PCB-1262	37324-23-5	50	0.44 U		24 U								
PCB-1268	11100-14-4	50	0.44 U		24 U								
Total PCBs	1336-36-3	50	1.2		39								
Sample ID		TSCA PCB Bulk Product Waste	ST12-PT-1A		ST12-PT-1B		ST12-PT-1C						
Sample Date	CAS#		1/31/2024	Q	1/31/2024	Q	1/31/2024	Q					
		(mg/Kg)											
PCB-1016	12674-11-2	50	0.10 U		0.10 U		0.10 U						
PCB-1221	11104-28-2	50	0.10 U		0.10 U		0.10 U						
PCB-1232	11141-16-5	50	0.10 U		0.10 U		0.10 U						
PCB-1242	53469-21-9	50	0.10 U		0.10 U		0.10 U						
PCB-1248	12672-29-6	50	0.10 U		0.10 U		0.10 U						
PCB-1254	11097-69-1	50	7.4		11		5.6						
PCB-1260	11096-82-5	50	0.10 U		0.10 U		0.10 U						
PCB-1262	37324-23-5	50	0.10 U		0.10 U		0.10 U						
PCB-1268	11100-14-4	50	0.10 U		0.10 U		0.10 U						
Total PCBs	1336-36-3	50	7.4		11		5.6						
Sample ID		TSCA PCB Bulk Product Waste	ST13-FP-1A		ST13-FP-1B		ST13-PT-1A		ST13-PT-1B		ST13-PT-1C		
Sample Date	CAS#		1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	1/31/2024	Q	
		(mg/Kg)											
PCB-1016	12674-11-2	50	0.1 U		0.1 U		0.1 U		0.1 U		0.1 U		
PCB-1221	11104-28-2	50	0.1 U		0.1 U		0.1 U		0.1 U		0.1 U		
PCB-1232	11141-16-5	50	0.1 U		0.1 *U		0.1 U		0.1 *U		0.1 *U		
PCB-1242	53469-21-9	50	0.1 U		0.1 U		0.1 U		0.1 U		0.1 U		
PCB-1248	12672-29-6	50	0.1 U		0.1 U		0.1 U		0.1 U		0.1 U		
PCB-1254	11097-69-1	50	0.1 U		12 *		6.3		4.3 *		6.4 *		
PCB-1260	11096-82-5	50	21		0.1 *U		0.1 U		0.1 *U		0.1 *U		
PCB-1262	37324-23-5	50	0.1 U		0.1 U		0.1 U		0.1 U		0.1 U		
PCB-1268	11100-14-4	50	0.1 U		0.1 U		0.1 U		0.1 U		0.1 U		
Total PCBs	1336-36-3	50	21		12		6.3		4.3		6.4		
Sample ID		TSCA PCB Bulk Product Waste	STAGE-CK-1A		STAGE-CK-1B		STAGE-PT-1A		STAGE-PT-1B		STAGE-PT-1C		STAGE-VN-1A
Sample Date	CAS#		1/30/2024	Q	1/31/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024	Q	1/30/2024
		(mg/Kg)											
PCB-1016	12674-11-2	50	0.44 U		0.1 U		2.1 U		2.1 U		0.47 U		1.7 U
PCB-1221	11104-28-2	50	0.44 U		0.1 U		2.1 U		2.1 U		0.47 U		1.7 U
PCB-1232	11141-16-5	50	0.44 U		0.1 *U		2.1 U		2.1 U		0.47 U		1.7 U
PCB-1242	53469-21-9	50	0.44 U		0.1 U		2.1 U		2.1 U		0.47 U		1.7 U
PCB-1248	12672-29-6	50	0.44 U		0.1 U		2.1 U		2.1 U		0.47 U		1.7 U
PCB-1254	11097-69-1	50	6.2		12 *		7.1		5.6		3.4		3.3
PCB-1260	11096-82-5	50	0.44 U		0.1 *U		2.1 U		2.1 U		0.47 U		1.7 U
PCB-1262	37324-23-5	50	0.44 U		0.1 U		2.1 U		2.1 U		0.47 U		1.7 U
PCB-1268	11100-14-4	50	0.44 U		0.1 U		2.1 U		2.1 U		0.47 U		1.7 U
Total PCBs	1336-36-3	50	6.2		12		7.1		5.6		3.4		3.3
Sample ID		TSCA PCB Bulk Product Waste	STAGE-VN-1B		STAGE-VN-1C								
Sample Date	CAS#		1/30/2024	Q	1/30/2024	Q							
		(mg/Kg)											
PCB-1016	12674-11-2	50	0.68 U		0.45 U								
PCB-1221	11104-28-2	50	0.68 U		0.45 U								
PCB-1232	11141-16-5	50	0.68 U		0.45 U								
PCB-1242	53469-21-9	50	0.68 U		0.45 U								
PCB-1248	12672-29-6	50	0.68 U		0.45 U								
PCB-1254	11097-69-1	50	2.6		4.2								
PCB-1260	11096-82-5	50	0.68 U		0.45 U								
PCB-1262	37324-23-5	50	0.68 U		0.45 U								
PCB-1268	11100-14-4	50	0.68 U		0.45 U								
Total PCBs	1336-36-3	50	2.6		4.2								

Table B-3:
2024 Supplemental Assessment
PCB Concentrations in Group 3 Building Materials

Sample ID		TSCA PCB Bulk Product Waste	WC9-MS-1A		WC9-MS-1B		WC9-MS-1C		WC9-PT-1A		WC9-PT-1B		WC9-PT-1C	
Sample Date	CAS#		1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q	1/29/2024	Q
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.16 U		0.45 U		0.33 U		1.9 U		2.1 U		1.6 U	
PCB-1221	11104-28-2	50	0.16 U		0.45 U		0.33 U		1.9 U		2.1 U		1.6 U	
PCB-1232	11141-16-5	50	0.16 U		0.45 U		0.33 U		1.9 U		2.1 U		1.6 U	
PCB-1242	53469-21-9	50	0.16 U		0.45 U		0.33 U		1.9 U		2.1 U		1.6 U	
PCB-1248	12672-29-6	50	0.16 U		0.45 U		0.33 U		1.9 U		2.1 U		1.6 U	
PCB-1254	11097-69-1	50	0.21		0.84		0.55		14		18		15	
PCB-1260	11096-82-5	50	0.16 U		0.45 U		0.33 U		1.9 U		2.1 U		1.6 U	
PCB-1262	37324-23-5	50	0.16 U		0.45 U		0.33 U		1.9 U		2.1 U		1.6 U	
PCB-1268	11100-14-4	50	0.16 U		0.45 U		0.33 U		1.9 U		2.1 U		1.6 U	
Total PCBs	1336-36-3	50	0.21		0.84		0.55		14		18		15	
Sample ID		TSCA PCB Bulk Product Waste	WC9-SL-1A		WC9-SL-1B		WC9-SL-1C							
Sample Date	CAS#		1/29/2024	Q	1/29/2024	Q	1/29/2024	Q						
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.11 U		0.16 U		0.22 U							
PCB-1221	11104-28-2	50	0.11 U		0.16 U		0.22 U							
PCB-1232	11141-16-5	50	0.11 U		0.16 U		0.22 U							
PCB-1242	53469-21-9	50	0.11 U		0.16 U		0.22 U							
PCB-1248	12672-29-6	50	0.11 U		0.16 U		0.22 U							
PCB-1254	11097-69-1	50	0.22		0.24		0.27							
PCB-1260	11096-82-5	50	0.11 U		0.16 U		0.22 U							
PCB-1262	37324-23-5	50	0.11 U		0.16 U		0.22 U							
PCB-1268	11100-14-4	50	0.11 U		0.16 U		0.22 U							
Total PCBs	1336-36-3	50	0.22		0.24		0.27							
Sample ID		TSCA PCB Bulk Product Waste	WC202-PT-1A		WC202-PT-1B		WC202-PT-1C							
Sample Date	CAS#		2/1/2024	Q	2/1/2024	Q	2/1/2024	Q						
		(mg/Kg)												
PCB-1016	12674-11-2	50	0.10 U		0.10 U		0.10 U							
PCB-1221	11104-28-2	50	0.10 U		0.10 U		0.10 U							
PCB-1232	11141-16-5	50	0.10 *U		0.10 *U		0.10 *U							
PCB-1242	53469-21-9	50	0.10 U		0.10 U		0.10 U							
PCB-1248	12672-29-6	50	0.10 U		0.10 U		0.10 U							
PCB-1254	11097-69-1	50	5.4 *		3.9 *		2.8 *							
PCB-1260	11096-82-5	50	0.10 *U		0.10 *U		0.10 *U							
PCB-1262	37324-23-5	50	0.10 U		0.10 U		0.10 U							
PCB-1268	11100-14-4	50	0.10 U		0.10 U		0.10 U							
Total PCBs	1336-36-3	50	5.4 *		3.9 *		2.8 *							

Key
TSCA - Toxic Substance Control Act
mg/kg - milligrams per kilogram (parts per million)
Bold results indicate detections of the analyte
Shaded results indicate an exceedence of the TSCA PCB Bulk Product Waste Criteria
Q - laboratory result qualifier
U - Analyte not detected; limit of quantitation listed
RPD- Relative Percent Difference
* - The PCB pattern did not resemble any of the standards, but most closely resembles a mixture of the Aroclors 1232 and 1254 and 1260. The PCB is quantitated as a timed group and is reported as the Aroclor 1254.

Table B-4:
2025 Supplemental Assessment - Fall 2025
Polychlorinated Biphenyl Concentrations in Indoor Air

Sample ID	SAL 7 Adult	5225-100-11252025	Q	5225-101-11252025	Q	5225-102-11252025	Q	5225-103-11252025	Q	5225-104-11252025	Q	5225-106-11252025	Q	5225-11252025-FB	Q	5225-138-11252025	Q
Sample Date	CAS#	µg/m3	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025
Aroclor-1016	12674-11-2	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U	0.040 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1221	11104-28-2	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U	0.040 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1232	11141-16-5	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U	0.040 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1242	53469-21-9	0.1	0.0062 U	0.0070	0.0062 U	0.0062 U	0.0062 U	0.0079	0.0062 U	0.0062 U	0.0062 U	0.0070	0.0070	0.040 U	0.018	0.018	0.018
Aroclor-1248	12672-29-6	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U	0.040 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1254	11097-69-1	0.1	0.0070	0.0074	0.0062 U	0.011	0.0097	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U	0.040 U	0.012	0.012	0.012
Aroclor-1260	11096-82-5	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U	0.040 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1262	37324-23-5	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U	0.040 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1268	11100-14-4	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U	0.040 U	0.0062 U	0.0062 U	0.0062 U
Total PCBs	1336-36-3	0.1	0.0070	0.014	0.011	0.018	0.018	0.018	0.018	0.018	0.018	0.0070	0.0070	0.040 U	0.030	0.030	0.030

Sample ID	SAL 7 Adult	5225-209-11252025	Q	5225-225A-11252025	Q	5225-231C-11252025	Q	5225-33-11252025	Q	5225-34-11252025	Q	5225-35-11252025	Q	5225-37-11252025	Q	5225-38-11252025	Q
Sample Date	CAS#	µg/m3	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025
Aroclor-1016	12674-11-2	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0063 U	0.0063 U	0.0063 U
Aroclor-1221	11104-28-2	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0063 U	0.0063 U	0.0063 U
Aroclor-1232	11141-16-5	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0063 U	0.0063 U	0.0063 U
Aroclor-1242	53469-21-9	0.1	0.0062 U	0.016	0.015	0.022	0.016	0.015	0.016	0.015	0.015	0.015	0.015	0.014	0.017	0.017	0.017
Aroclor-1248	12672-29-6	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0063 U	0.0063 U	0.0063 U
Aroclor-1254	11097-69-1	0.1	0.0062 U	0.011	0.013	0.012	0.011	0.0089	0.011	0.0089	0.010	0.0089	0.010	0.0061 U	0.0063 U	0.0063 U	0.0063 U
Aroclor-1260	11096-82-5	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0063 U	0.0063 U	0.0063 U
Aroclor-1262	37324-23-5	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0063 U	0.0063 U	0.0063 U
Aroclor-1268	11100-14-4	0.1	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0063 U	0.0063 U	0.0063 U
Total PCBs	1336-36-3	0.1	0.0062 U	0.027	0.029	0.034	0.027	0.027	0.027	0.027	0.027	0.027	0.027	0.024	0.028	0.028	0.028

Sample ID	SAL 7 Adult	5225-AA-11252025	Q	5225-C7-11252025	Q	5225-C8-11252025	Q	5225-CAFEA-11252025	Q	5225-CAFE-11252025	Q	5225-E200-11252025	Q	5225-ER2-11252025	Q	5225-ER7-11252025	Q
Sample Date	CAS#	µg/m3	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025
Aroclor-1016	12674-11-2	0.1	0.0060 U	0.0062 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0059 U	0.0061 U	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U
Aroclor-1221	11104-28-2	0.1	0.0060 U	0.0062 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0059 U	0.0061 U	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U
Aroclor-1232	11141-16-5	0.1	0.0060 U	0.0062 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0059 U	0.0061 U	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0063 U	0.0063 U
Aroclor-1242	53469-21-9	0.1	0.0060 U	0.009	0.009	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0082	0.017	0.0063	0.017	0.0063	0.018	0.018	0.018
Aroclor-1248	12672-29-6	0.1	0.0060 U	0.0062 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0059 U	0.0061 U	0.0061 U	0.0061 U	0.0062 U	0.0063 U	0.0063 U	0.0063 U
Aroclor-1254	11097-69-1	0.1	0.0060 U	0.0086	0.0062	0.014	0.0067	0.028	0.0086	0.028	0.0086	0.028	0.0086	0.035	0.035	0.035	0.035
Aroclor-1260	11096-82-5	0.1	0.0060 U	0.0062 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0059 U	0.0061 U	0.0061 U	0.0061 U	0.0062 U	0.0063 U	0.0063 U	0.0063 U
Aroclor-1262	37324-23-5	0.1	0.0060 U	0.0062 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0059 U	0.0061 U	0.0061 U	0.0061 U	0.0062 U	0.0063 U	0.0063 U	0.0063 U
Aroclor-1268	11100-14-4	0.1	0.0060 U	0.0062 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0061 U	0.0059 U	0.0061 U	0.0061 U	0.0061 U	0.0062 U	0.0063 U	0.0063 U	0.0063 U
Total PCBs	1336-36-3	0.1	0.0060 U	0.018	0.062	0.014	0.015	0.015	0.015	0.015	0.015	0.046	0.046	0.015	0.053	0.053	0.053

Sample ID	SAL 7 Adult	5225-GARAGE-11252025	Q	5225-H1-11252025	Q	5225-H15-11252025	Q	5225-H18-11252025	Q	5225-H5-11252025	Q	5225-ST1-11252025	Q	5225-ST1-11252025-FD	Q	RPD% (5225-ST1-11252025)
Sample Date	CAS#	µg/m3	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025
Aroclor-1016	12674-11-2	0.1	0.0061 U	0.0066 U	0.0056 U	0.0061 U	0.0061 U	0.0062 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	-	-
Aroclor-1221	11104-28-2	0.1	0.0061 U	0.0066 U	0.0056 U	0.0061 U	0.0061 U	0.0062 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	-	-
Aroclor-1232	11141-16-5	0.1	0.0061 U	0.0066 U	0.0056 U	0.0061 U	0.0061 U	0.0062 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	-	-
Aroclor-1242	53469-21-9	0.1	0.011	0.014	0.0091	0.0066	0.011	0.013	0.0066	0.011	0.013	0.013	0.013	0.013	0%	0%
Aroclor-1248	12672-29-6	0.1	0.0061 U	0.0066 U	0.0056 U	0.0061 U	0.0061 U	0.0062 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	-	-
Aroclor-1254	11097-69-1	0.1	0.012	0.0097	0.0079	0.0065	0.0074	0.0065	0.0065	0.0077	0.0067	0.0067	0.0067	0.0067	14%	14%
Aroclor-1260	11096-82-5	0.1	0.0061 U	0.0066 U	0.0056 U	0.0061 U	0.0061 U	0.0062 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	-	-
Aroclor-1262	37324-23-5	0.1	0.0061 U	0.0066 U	0.0056 U	0.0061 U	0.0061 U	0.0062 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	-	-
Aroclor-1268	11100-14-4	0.1	0.0061 U	0.0066 U	0.0056 U	0.0061 U	0.0061 U	0.0062 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	-	-
Total PCBs	1336-36-3	0.1	0.023	0.0237	0.017	0.014	0.017	0.017	0.017	0.017	0.017	0.0207	0.0207	0.0197	5%	5%

Sample ID	SAL 7 Adult	5225-ST11-11252025	Q	5225-ST12-11252025	Q	5225-ST4-11252025	Q	5225-ST5-11252025	Q	5225-ST6-11252025	Q	5225-STAIR3-11252025	Q	5225-WC1-11252025	Q	5225-WC11-11252025	Q
Sample Date	CAS#	µg/m3	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025	11/25/2025
Aroclor-1016	12674-11-2	0.1	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1221	11104-28-2	0.1	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1232	11141-16-5	0.1	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1242	53469-21-9	0.1	0.0086	0.0061 U	0.013	0.013	0.017	0.013	0.017	0.013	0.017	0.012	0.012	0.012	0.0086	0.0086	0.0086
Aroclor-1248	12672-29-6	0.1	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1254	11097-69-1	0.1	0.0065	0.026	0.0096	0.011	0.011	0.010	0.011	0.010	0.010	0.0085	0.0085	0.0085	0.0075	0.0075	0.0075
Aroclor-1260	11096-82-5	0.1	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U	0.0061 U	0.0061 U	0.0062 U	0.0062 U	0.0062 U	0.0062 U
Aroclor-1262	37324-23-5	0.1	0.0061 U	0.0061 U	0.0062 U	0.006											

Table B-6:
2025 Supplemental Assessment
Polychlorinated Biphenyl Concentrations in Building Materials

Sample ID		TSCA PCB Bulk Product Waste	102-CK-2A	Q	128-AC-1A	Q	128-AC-1B	Q	128-AC-1C	Q	138-CK-1A	Q	138-CK-1B	Q	33-AC-1A	Q	33-AC-1B	Q
Sample Date	CAS#	(mg/kg)	7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025	
PCB-1016	12674-11-2	50	1.6 U		0.14 U		0.17 U		0.16 U		1.6 U		14 U		0.14 U		0.17 U	
PCB-1221	11104-28-2	50	1.6 U		0.14 U		0.17 U		0.16 U		1.6 U		14 U		0.14 U		0.17 U	
PCB-1232	11141-16-5	50	1.6 U		0.14 U		0.17 U		0.16 U		1.6 U		14 U		0.14 U		0.17 U	
PCB-1242	53469-21-9	50	1.6 U		0.14 U		0.17 U		0.16 U		1.6 U		14 U		0.14 U		0.17 U	
PCB-1248	12672-29-6	50	1.6 U		0.14 U		0.17 U		0.16 U		1.6 U		14 U		0.14 U		0.17 U	
PCB-1254	11097-69-1	50	3.2		0.41		0.33		0.32		15 *		57 *		0.29		1.1 *	
PCB-1260	11096-82-5	50	1.6 U		0.14 U		0.17 U		0.16 U		1.6 U		14 U		0.14 U		0.17 U	
PCB-1262	37324-23-5	50	1.6 U		0.14 U		0.17 U		0.16 U		1.6 U		14 U		0.14 U		0.17 U	
PCB-1268	11100-14-4	50	1.6 U		0.14 U		0.17 U		0.16 U		1.6 U		14 U		0.14 U		0.17 U	
Total PCBs	1336-36-3	50	3.2		0.41		0.33		0.32		15		57		0.29		1.1	

Sample ID		TSCA PCB Bulk Product Waste	33-AC-1C	Q	CAFEA-CK-1A	Q	CAFEA-CK-1D	Q	CAFEA-CK-1E	Q	CAFEA-CK-1F	Q	CAFEA-CK-1G	Q	CAFEA-CK-1H	Q	CAFEA-CK-1I	Q
Sample Date	CAS#	(mg/kg)	7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025	
PCB-1016	12674-11-2	50	0.14 U		7400 U		15000 U		15000 U		7200 U		1.6 U		15 U		16 U	
PCB-1221	11104-28-2	50	0.14 U		7400 U		15000 U		15000 U		7200 U		1.6 U		15 U		16 U	
PCB-1232	11141-16-5	50	0.14 U		7400 U		15000 U		15000 U		7200 U		1.6 U		15 U		16 U	
PCB-1242	53469-21-9	50	0.14 U		7400 U		15000 U		15000 U		7200 U		1.6 U		15 U		16 U	
PCB-1248	12672-29-6	50	0.14 U		7400 U		15000 U		15000 U		7200 U		1.6 U		15 U		16 U	
PCB-1254	11097-69-1	50	0.72 *		56000		49000		64000		66000		11		44 *		51 *	
PCB-1260	11096-82-5	50	0.14 U		7400 U		15000 U		15000 U		7200 U		1.6 U		15 U		16 U	
PCB-1262	37324-23-5	50	0.14 U		7400 U		15000 U		15000 U		7200 U		1.6 U		15 U		16 U	
PCB-1268	11100-14-4	50	0.14 U		7400 U		15000 U		15000 U		7200 U		1.6 U		15 U		16 U	
Total PCBs	1336-36-3	50	0.72		56000		49000		64000		66000		11		44		51	

Sample ID		TSCA PCB Bulk Product Waste	CAFEA-CK-1J	Q	CAFEA-CK-1K	Q	CAFEA-CK-1K-DUP	Q	CAFEB-CK-1A	Q	H18-FP-1D	Q	H18-FP-1E	Q	ST17-CT-1A	Q	RPD (CAFEA-CK-1K)
Sample Date	CAS#	(mg/kg)	7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025		7/17/2025		
PCB-1016	12674-11-2	50	16000 U		15000 U		15000 U		1.6 U		16 U		15 U		0.25 U		-
PCB-1221	11104-28-2	50	16000 U		15000 U		15000 U		1.6 U		16 U		15 U		0.25 U		-
PCB-1232	11141-16-5	50	16000 U		15000 U		15000 U		1.6 U		16 U		15 U		0.25 U		-
PCB-1242	53469-21-9	50	16000 U		15000 U		15000 U		1.6 U		16 U		15 U		0.25 U		-
PCB-1248	12672-29-6	50	16000 U		15000 U		15000 U		1.6 U		16 U		15 U		0.25 U		-
PCB-1254	11097-69-1	50	48000		53000		55000		4.9 *		16 U		15 U		0.46		4%
PCB-1260	11096-82-5	50	16000 U		15000 U		15000 U		1.6 U		130		48		0.25 U		-
PCB-1262	37324-23-5	50	16000 U		15000 U		15000 U		1.6 U		16 U		15 U		0.25 U		-
PCB-1268	11100-14-4	50	16000 U		15000 U		15000 U		1.6 U		16 U		15 U		0.25 U		-
Total PCBs	1336-36-3	50	48000		53000		55000		4.9		130		48		0.46		4%

Sample ID		TSCA PCB Bulk Product Waste	ST17-CT-1B	Q	ST17-CT-1C	Q	WC11-CK-1A	Q	AHU-15-DS-01	Q	AHU-15-DS-01-FD	Q	AHU-2-DS-01	Q	ER-1-BK-01	Q	RPD (AHU-15-DS-01)
Sample Date	CAS#	(mg/kg)	7/17/2025		7/17/2025		7/17/2025		11/24/2025		11/24/2025		11/24/2025		11/24/2025		
PCB-1016	12674-11-2	50	0.43 U		0.31 U		1.5 U		45 U		50 U		50 U		5.4 U		-
PCB-1221	11104-28-2	50	0.43 U		0.31 U		1.5 U		45 U		50 U		50 U		5.4 U		-
PCB-1232	11141-16-5	50	0.43 U		0.31 U		1.5 U		45 U		50 U		50 U		5.4 U		-
PCB-1242	53469-21-9	50	0.43 U		0.31 U		1.5 U		45 U		50 U		50 U		5.4 U		-
PCB-1248	12672-29-6	50	0.43 U		0.31 U		1.5 U		45 U		50 U		50 U		5.4 U		-
PCB-1254	11097-69-1	50	0.57		0.54		8.4		45 U		50 U		50 U		9.9		-
PCB-1260	11096-82-5	50	0.43 U		0.31 U		1.5 U		45 U		50 U		50 U		9.4		-
PCB-1262	37324-23-5	50	0.43 U		0.31 U		1.5 U		45 U		50 U		50 U		5.4 U		-
PCB-1268	11100-14-4	50	0.43 U		0.31 U		1.5 U		45 U		50 U		50 U		5.4 U		-
Total PCBs	1336-36-3	50	0.57		0.54		8.4		45 U		50 U		50 U		19.3		-

Sample ID		TSCA PCB Bulk Product Waste	ER-1-DS-01	Q	ER-1-DS-02	Q	ER-1-DS-03	Q	ER-1-PT-01	Q
Sample Date	CAS#	(mg/kg)	11/24/2025		11/24/2025		11/24/2025		11/24/2025	
PCB-1016	12674-11-2	50	47 U		50 U		20 U		4.8 U	
PCB-1221	11104-28-2	50	47 U		50 U		20 U		4.8 U	
PCB-1232	11141-16-5	50	47 U		50 U		20 U		4.8 U	
PCB-1242	53469-21-9	50	47 U		50 U		20 U		20	
PCB-1248	12672-29-6	50	47 U		50 U		20 U		4.8 U	
PCB-1254	11097-69-1	50	47 U		50 U		20 U		16	
PCB-1260	11096-82-5	50	47 U		50 U		20 U		12	
PCB-1262	37324-23-5	50	47 U		50 U		20 U		4.8 U	
PCB-1268	11100-14-4	50	47 U		50 U		20 U		4.8 U	
Total PCBs	1336-36-3	50	47 U		50 U		20 U		48	

Key
TSCA - Toxic Substance Control Act
mg/kg - milligrams per kilogram (parts per million)
Bold results indicate detections of the analyte

Shaded results indicate an exceedance of TSCA

Q - laboratory result qualifier

U - Analyte not detected; limit of quantitation listed

* - The PCB pattern did not resemble any of the standards, but most closely resembles a mixture of the Aroclors 1232 and 1254 and 1260. The PCB is quantitated as a timed group and is reported as the Aroclor 1254.

Table B-7:
2025 Supplemental Site Investigation - Kitchen
Polychlorinated Biphenyl Concentrations in Building Materials

Sample ID		TSCA PCB Bulk Product Waste	CAFEA-MS-01-3	Q	CAFEA-MS-01-6	Q	CAFEA-MS-01-9	Q	CAFEA-MS-02-3	Q	CAFEA-MS-02-6	Q	CAFEA-MS-02-9	Q	CAFEA-MS-03-3	Q	CAFEA-MS-03-6	Q
Sample Date	CAS#	mg/Kg	11/24/2025		11/24/2025		11/24/2025		11/24/2025		11/24/2025		11/24/2025		11/24/2025		11/24/2025	
PCB-1016	12674-11-2	50	0.40 U		0.39 U		0.099 U		0.40 U		0.10 U		0.10 U		0.98 U		0.38 U	
PCB-1221	11104-28-2	50	0.40 U		0.39 U		0.099 U		0.40 U		0.10 U		0.10 U		0.98 U		0.38 U	
PCB-1232	11141-16-5	50	0.40 U		0.39 U		0.099 U		0.40 U		0.10 U		0.10 U		0.98 U		0.38 U	
PCB-1242	53469-21-9	50	0.40 U		0.39 U		0.099 U		0.40 U		0.10 U		0.10 U		0.98 U		0.38 U	
PCB-1248	12672-29-6	50	0.40 U		0.39 U		0.099 U		0.40 U		0.10 U		0.10 U		0.98 U		0.38 U	
PCB-1254	11097-69-1	50	1.7		2.4		0.53		1.9		0.61		0.38		7.0		1.5	
PCB-1260	11096-82-5	50	0.40 U		0.39 U		0.099 U		0.40 U		0.10 U		0.10 U		0.98 U		0.38 U	
PCB-1262	37324-23-5	50	0.40 U		0.39 U		0.099 U		0.40 U		0.10 U		0.10 U		0.98 U		0.38 U	
PCB-1268	11100-14-4	50	0.40 U		0.39 U		0.099 U		0.40 U		0.10 U		0.10 U		0.98 U		0.38 U	
Total PCBs	1336-36-3	50	1.7		2.4		0.53		1.9		0.61		0.38		7.0		1.5	

Sample ID		TSCA PCB Bulk Product Waste	CAFEA-MS-03-9	Q	CAFEA-MS-04-3	Q	CAFEA-MS-04-3-FD	Q	CAFEA-MS-04-6	Q	CAFEA-MS-04-9	Q	CAFEA-MS-05-3	Q	CAFEA-MS-05-6	Q	CAFEA-MS-05-9	Q	RPD
Sample Date	CAS#	mg/Kg	11/24/2025		11/24/2025		11/24/2025		11/24/2025		11/24/2025		11/24/2025		11/24/2025		11/24/2025		(CAFEA-MS-04-3)
PCB-1016	12674-11-2	50	0.10 U		0.39 U		0.4 U		0.098 U		0.099 U		0.39 U		0.10 U		0.097 U		-
PCB-1221	11104-28-2	50	0.10 U		0.39 U		0.4 U		0.098 U		0.099 U		0.39 U		0.10 U		0.097 U		-
PCB-1232	11141-16-5	50	0.10 U		0.39 U		0.4 U		0.098 U		0.099 U		0.39 U		0.10 U		0.097 U		-
PCB-1242	53469-21-9	50	0.10 U		0.39 U		0.4 U		0.098 U		0.099 U		0.39 U		0.10 U		0.097 U		-
PCB-1248	12672-29-6	50	0.10 U		0.39 U		0.4 U		0.35		0.24		0.39 U		0.10 U		0.097 U		-
PCB-1254	11097-69-1	50	0.78		5.0		4.9		0.55		0.42		3.0		0.82		0.22		2%
PCB-1260	11096-82-5	50	0.10 U		0.39 U		0.4 U		0.098 U		0.099 U		0.39 U		0.10 U		0.097 U		-
PCB-1262	37324-23-5	50	0.10 U		0.39 U		0.4 U		0.098 U		0.099 U		0.39 U		0.10 U		0.097 U		-
PCB-1268	11100-14-4	50	0.10 U		0.39 U		0.4 U		0.098 U		0.099 U		0.39 U		0.10 U		0.097 U		-
Total PCBs	1336-36-3	50	0.78		5.0		4.9		0.90		0.66		3.0		0.82		0.22		2%

Key
TSCA - Toxic Substance Control Act
mg/kg - milligrams per kilogram (parts per million)
Bold results indicate detections of the analyte
RPD- Relative Percent Difference
Q - laboratory result qualifier
U - Analyte not detected; limit of quantitation listed

Appendix C: Detailed Cost Estimate

Project No.: 20231031						
Project Name: U32 Partial CAP: Kitchen						
Detailed Cost Estimate						
Task Number/Name		Description	Unit Rate	Unit	Units	Amount
1 - Project Management						\$ 4,894
Professional Services					27	\$ 4,894
	Scientist	Senior Professional 3	\$ 220.42	Hours	2	\$ 441
	Scientist	Senior Professional 2	\$ 201.88	Hours	16	\$ 3,230
	Scientist	Senior Professional 2	\$ 201.88	Hours	2	\$ 404
	Scientist	Staff Professional 2	\$ 121.54	Hours	2	\$ 243
	Engineer	Senior Professional 1	\$ 192.61	Hours	1	\$ 193
	Scientist	Administrative Associate	\$ 95.79	Hours	4	\$ 383
2 - Pre-Construction						\$ 6,523
Professional Services					40	\$ 6,485
	Scientist	Project Professional 2	\$ 154.50	Hours	8	\$ 1,236
	Engineer	Senior Professional 1	\$ 192.61	Hours	8	\$ 1,541
	Scientist	Project Professional 2	\$ 154.50	Hours	24	\$ 3,708
Subcontractors/Consultants					0	\$ -
External Expenses					48	\$ 38
	Mileage		\$ 0.73	Miles	48	\$ 38
3 - PCB Materials Abatement						\$ 32,848
Professional Services					46	\$ 6,555
	Scientist	Senior Professional 2	\$ 201.88	Hours	12	\$ 2,423
	Scientist	Staff Professional 2	\$ 121.54	Hours	34	\$ 4,132
Subcontractors/Consultants					329	\$ 25,922
	Abatement Contractor - Mobilization & S		\$ 10,000.00	LS	1	\$ 11,000
	Abatement Contractor - Abatement & Di		\$ 35.00	SF	325	\$ 12,513
	Waste Characterization - Analytical - TC		\$ 110.00	Each	1	\$ 121
	Analytical - PCBs in Water		\$ 80.00	Each	1	\$ 88
	Transport & Disposal - Decontamination		\$ 2,000.00	Drum	1	\$ 2,200
External Expenses					67	\$ 84
	Mileage		\$ 0.73	Miles	64	\$ 51
	Field Supplies & Equipment		\$ 10.00	Each	3	\$ 33
Internal Expenses					8	\$ 288
	PPE		\$ 22.00	Day/Staff	4	\$ 88
	Samsung Field Tablet		\$ 50.00	Day	3	\$ 150
	55-Gallon Drum		\$ 50.00	Each	1	\$ 50
4 - Cleanup Verification Sampling						\$ 4,265
Professional Services					13	\$ 1,741
	Scientist	Senior Professional 2	\$ 201.88	Hours	2	\$ 404
	Scientist	Staff Professional 2	\$ 121.54	Hours	11	\$ 1,337
Subcontractors/Consultants					25	\$ 2,200
	Analytical - PCBs Solid		\$ 80.00	Each	24	\$ 2,112
	Analytical - PCBs Wipe		\$ 80.00	Each	1	\$ 88
External Expenses					19	\$ 205
	Shipping/Freight		\$ 125.00	Each	1	\$ 138
	Field Supplies & Equipment		\$ 25.00	Each	2	\$ 55
	Mileage		\$ 0.73	Miles	16	\$ 13
Internal Expenses					4	\$ 119

	PPE		\$ 22.00	Day/Staff	2	\$ 44
	Cordless Milwaukee Hammer Drill		\$ 25.00	Day	1	\$ 25
	Samsung Field Tablet		\$ 50.00	Day	1	\$ 50
5 - Confirmatory Indoor Air Sampling						\$ 2,233
Professional Services					9	\$ 1,255
	Scientist	Senior Professional 2	\$ 201.88	Hours	2	\$ 404
	Scientist	Staff Professional 2	\$ 121.54	Hours	7	\$ 851
Subcontractors/Consultants					4	\$ 506
	Analytical - PCBs by TO-10A		\$ 115.00	Each	4	\$ 506
External Expenses					34	\$ 191
	Field Supplies & Equipment		\$ 25.00	Each	1	\$ 28
	Shipping/Freight		\$ 125.00	Each	1	\$ 138
	Mileage		\$ 0.73	Miles	32	\$ 26
Internal Expenses					12	\$ 282
	Samsung Field Tablet		\$ 50.00	Day	2	\$ 100
	Tygon .375 inch OD, .25 inch ID		\$ 5.80	Feet	4	\$ 23
	PPE		\$ 22.00	Day/Staff	2	\$ 44
	SKC Airchek 52		\$ 30.00	Day	3	\$ 90
	SKC Chek Mate Calibrator		\$ 25.00	Day	1	\$ 25
6 - CACCR						\$ 7,091
Professional Services					46	\$ 7,091
	Scientist	Senior Professional 3	\$ 220.42	Hours	2	\$ 441
	Scientist	Senior Professional 2	\$ 201.88	Hours	8	\$ 1,615
	Scientist	Project Professional 1	\$ 142.14	Hours	24	\$ 3,411
	Scientist	Project Professional 1	\$ 142.14	Hours	8	\$ 1,137
	Scientist	Staff Professional 2	\$ 121.54	Hours	4	\$ 486
TOTAL						\$ 57,854
CONTINGENCY (30%)						\$ 17,356
GRAND TOTAL						\$ 75,210