FAX

MONTGOMERY WATSON

2100 Corporate Drive
Addison, IL 60101

Tel: 630 691-5020
Fax: 630 691-5133

US EPA RECORDS CENTER REGION 5
451205

Date: 30-Dec-96

To:	Sheri Bianchin	Fax No.:	(312) 886-4071
	Jim Chapman	Fax No.:	(312) 353-9281
	Holly Grejda	Fax No.:	(317) 308-3063
	Steve Mrkvika	Fax No.:	(312) 346-4781

From: Peter Vagt

Subject: ACS NPL Site Sediment Sampling

COMMENTS

The following items are attached to provide a summary of the Round 1 and Round 2 Sediment Sample Analyses results:

Table 1. Update of Wetland PCB Sediment Sampling. This table includes the analytical results for PCBs and mercury in the Round 1 analyses and the PCB results for the Round 2 analyses.

Plot of Results through Round 2. This is a two-page tabulation to provide a graphic representation of the results of the first two rounds of analysis.

Table 2. Sample Analysis Selection Matrix. This is a tabulation of all samples collected, with a listing of which samples are being analyzed for each round of analysis. The column titled "**Rd 3 Spls**" indicates the samples that have been submitted for the third round of analysis.

If you do not receive all pages, or if there are any problems with this transmission, please call (608) 231-4747. Operator: _____ *No. of pages including cover:* 11

Update of Wetland PCB Sediment Sampling
American Chemical Service NPL Site
Griffith, Indiana

Table 1

Sample-ID	Depth	AR-1016	AR-1221	AR-1232	AR-1242	AR-1248		AR-1254		AR-1260		Total PCBs mg/kg	Mercury mg/kg
Round 1 Analytical Results - Final, Unvalidated: 12/9/96													
APD-Culvert Outfall	0.5	U	U	U	U	510		810	P	760	P	2.08	0.16 UN
APD-Culvert Downstream	0.5	U	U	U	U	58		110	P	120		0.29	0.11 UN
APD-Culvert Upstream (1)	0.5	U	U	U	U	29	JP	43	JP	27	JP	0.10	0.17 UN
APD-Culvert Upstream (2)	0.5	U	U	U	U	U		U		U		ND	0.19 UN
APD-SDB1	0.5	U	U	U	U	U		15	JP	41	J	0.056	0.43 U
APD-SDB5	0.5	U	U	U	U	250		830		430	P	**1.5**	**0.28**
APD-SDB9	0.5	U	U	U	U	2,100	J	7,100		4,900	P	**14.1**	**0.28**
APD-SDC2	0.5	U	U	U	U	49	JP	99	P	63	JP	0.21	0.24 U
APD-SDC4	0.5	U	U	U	U	72	P	230		130	P	0.432	0.17 U
APD-SDC6	0.5	U	U	U	U	190	JP	940		760		**1.89**	0.12 U
APD-SDC8	0.5	U	U	U	U	23,000		35,000	P	15,000	P	**73**	**0.60**
APD-SDC9	1.0	U	U	U	U	21	JP	49	P	23	JP	0.093	0.12 U
APD-SDC10	0.5	U	U	U	U	170	P	360	P	170	P	0.7	0.12 UN
APD-SDD3	0.5	U	U	U	U	62	P	170		87	P	0.319	0.17 U
APD-SDD7	0.5	U	U	U	U	78	JP	320		250		0.65	0.11 U
APD-SDD9	0.5	U	U	U	U	8	JP	12	JP	6.9	JP	0.021	0.10 U
APD-SDT1 (B)	0.5	U	U	U	U	1,800	JP	4,800	P	3,600		**10.2**	**0.44**
APD-SDT1 (C)	0.5	U	U	U	U	2,300	JP	9,300	P	2,800	J	**14.4**	**1.4**
APD-SDT1 (D)	0.5	U	U	U	U	510	JP	3,500	P	1,200		**5.2**	**2.6**
APD-SDT2 (B)	0.5	U	U	U	U	930	J	3,400	P	2,900	P	**7.23**	0.15 U
APD-SDT2 (C)	0.5	U	U	U	U	99,000		200,000		60,000	JP	**359**	**6.1**
APD-SDT2 (D)	0.5	U	U	U	U	6,700	JP	17,000		5,400	JP	**29**	**1.6**
APD-SDT3 (B)	0.5	U	U	U	U	54,000	P	150,000		30,000	JP	**234**	**1.2**
APD-SDT3 (C)	1.0	U	U	U	U	80	P	100	58	43	JP	0.28	0.13 U
APD-SDT3 (D)	0.5	U	U	U	U	2,200	JP	7,000		6,500	P	**16**	**2.5**
APD-SDT4 (B)	0.5	U	U	U	U	13	JP	80	P	51	P	0.15	0.19 UN
APD-SDT4 (C)	1.0	U	U	U	U	10,000	JP	31,000	JP	19,000	J	**60**	0.28 N
APD-SDT4 (D)	0.5	U	U	U	U	22	JP	590		200		0.81	0.12 UN

FROM :MONTGOMERY WATSON 708 691 5133 1996,12-30 09:00 #008 P.02/11

2

Table 1

Sample-ID	Depth	AR-1016	AR-1221	AR-1232	AR-1242	AR-1248		AR-1254		AR-1260		Total PCBs mg/kg	Mercury mg/kg
Round 2 Analytical Results - Preliminary Draft: 12/23/96													
APD-Culvert Outfall	1.0	U	U	U	U		U	28	JP		U	0.028	na
APD-SDA2	0.5	U	U	U	U		U	130		66		0.196	na
APD-SDA5	0.5	U	U	U	U	4.2	JP	2.8	JP	U		0.007	na
APD-SDA9	0.5	U	U	U	U		U	170		150		0.32	na
APD-SDB1 Dup	0.5	U	U	U	U							ND	na
APD-SDB4	0.5	U	U	U	U	38	J	54	J	4	JP	0.106	na
APD-SDB5	1.0	U	U	U	U		U		U		U	ND	na
APD-SDB6	0.5	U	U	U	U	160	J	370		190	J	0.72	na
APD-SDB8	0.5	U	U	U	U	79	J	250		83	J	0.412	na
APD-SDB9	1.0	U	U	U	U	27	JP	41	JP		U	0.068	na
APD-SDB10	0.5	U	U	U	U	230	J	570		300	JP	1.2	na
APD-SDC5	0.5	U	U	U	U							ND	na
APD-SDC6	1.0	U	U	U	U		U		U		U	ND	na
APD-SDC7	0.5	U	U	U	U		U	450		200		0.65	na
APD-SDC7 Dup	0.5	U	U	U	U		U	20,000			U	20	na
APD-SDC8	1.0	U	U	U	U	68		52			U	0.12	na
APD-SDC10	1.0	U	U	U	U	71		73	P		U	0.144	na
APD-SDC11	0.5	U	U	U	U	U		840		630		1.47	na
APD-SDD6	0.5	U	U	U	U		U		U		U	ND	na
APD-SDD8	0.5	U	U	U	U		U	44	P		U	0.044	na
APD-SDD10	0.5	U	U	U	U		U	95		35		0.13	na
APD-SD T1 (A)	0.5	U	U	U	U		U	570		240		0.81	na
APD-SD T1 (B)	1.0	U	U	U	U	8	JP	35	J	10	J	0.063	na
APD-SD T1 (C)	1.0	U	U	U	U	120	P	250		91	P	0.461	na
APD-SD T1 (D)	1.0	U	U	U	U	U		160		38	JP	0.198	na
APD-SD T1 (E)	0.5	U	U	U	U	57	JP	180	P		U	0.237	na
APD-SD T2 (A)	0.5	U	U	U	U		U	260	P		U	0.26	na
APD-SD T2 (B)	1.0	U	U	U	U		U	220		93		0.313	na
APD-SD T2 (C)	1.0	U	U	U	U		U	1,800			U	1.8	na
APD-SD T2 (D)	1.0	U	U	U	U	U		3,800			U	3.8	na
APD-SD T2 (D) Dup	0.5	U	U	U	U							ND	na
APD-SD T2 (D) Dup	1.0	U	U	U	U							ND	na

FROM :MONTGOMERY WATSON 708 691 5133 1996.12-30 09:01 #006 P.03/11

Update of Wetland PCB Sediment Sampling

Table 1

American Chemical Service NPL Site
Griffith, Indiana

Sample-ID	Depth	AR-1016	AR-1221	AR-1232	AR-1242	AR-1248		AR-1254		AR-1260	Total PCBs mg/kg	Mercury mg/kg
APD-SD T2 (E)	0.5	U	U	U	U		U		U	U	ND	na
APD-SD T3 (A)	0.5	U	U	U	U	5,000	PD	6,600	PD	U	11.6	na
APD-SD T3 (B)	1.0	U	U	U	U	13,000	PD	14,000	PD	U	27	na
APD-SD T3 (D)	1.0	U	U	U	U	61	P	89	P	U	0.15	na
APD-SD T3 (E)	0.5	U	U	U	U	U		320		400	0.72	na
APD-SD T4 (C)	1.5	U	U	U	U		U	7,600		3,600	11.2	na

Notes:
This table presents results for sediment samples collected at the ACS Site in Griffith, Indiana between November 20 and 22, 1996. Samples were analyzed in rounds. Round 1 was determined by mutual agreement between all parties. Round two samples were selected to include intervals to the side and beneath any sample with total PCBs greater than 1 ppm. Results are added to this table as the become available. The last date of revision is presented in each round's header line.

U = undetected
J = The associated numerical value is an estimated quantity, because the value was less than the CRQL.
P = This flag is used for a pesticide/PCB target compound when there is greater than 25% difference for the detected concentrations between the two GC columns. The lower of the two values is reported.
N = Indicates spike sample recovery was not within control limits.
na = Not analyzed.

FROM MONTGOMERY WATSON 708 691 5133 1996,12-30 09:02 #008 P.04/11

4

6

Plot of Results through Round 2

Transect Samples

depth										
0.5	T1 (A)	0.81	*T1 (B)*	**10**	*T1 (C)*	**14**	*T1 (D)*	4.2	T1 (E)	0.24
1.0		E		0.063		0.46		0.20		E
1.5		E		E		E		E		E
0.5	T2 (A)	0.26	*T2 (B)*	**7.2**	*T2 (C)*	**359**	*T2 (D)*	**29**	T2 (E)	ND
1.0		A		0.313		1.8		3.8		E
1.5		E		E		A		A		E
0.5	T3 (A)	**12**	*T3 (B)*	**234**	*T3 (C)*	SD35=17	*T3 (D)*	**16**	T3 (E)	0.72
1.0		A		**27**		0.281		0.15		E
1.5		E		A				E		E
0.5	T4 (A)	A	*T4 (B)*	0.15	*T4 (C)*	SD21-13	*T4 (D)*	0.8	T4 (E)	
1.0						**60**				
1.5						11.2				

Culvert Samples

0.5	*Dwnstrm*	0.29	***Outfall***	**2.1**
1.0				0.028
1.5				E
0.5			*Upstrm 1*	0.099
1.0				
1.5				
0.5			*Upstrm 2*	ND
1.0				
1.5				

5

Plot of Results through Round 2

SEDIMENT SAMPLE PCB RESULTS

Grid Samples

depth									
0.5	A1	E	*B1*	0.056	C1		D1		
1.0		E							
1.5		E							
0.5	A2	0.190	B2	E	C2	0.21	D2		
1.0		E		E					
1.5		E		E					
0.5	A3	E	B3	E	C3		*D3*	0.32	
1.0		E		E					
1.5		E		E					
0.5	A4	E	B4	0.11	*C4*	0.43	D4		
1.0		E		E					
1.5		E		E					
0.5	A5	0.007	***B5***	**1.51**	C5	ND	D5	E	
1.0		E		ND		E		E	
1.5		E		E		E		E	
0.5	A6	E	B6	0.72	***C6***	**1.9**	D6	ND	E6 E
1.0		E		E		ND		E	E
1.5		E		E		E		E	E
0.5	A7	E	B7	A	C7	0.65	*D7*	0.65	E7
1.0		E		E		A			
1.5		E		E		E			
0.5	A8	E	B8	0.41	***C8***	**73**	D8	0.044	E8 E
1.0		E		E		0.12		E	E
1.5		E		E		E		E	E
0.5	A9	0.32	***B9***	**14.1**	C9	SD33=126	*D9*	0.021	
1.0		E		0.068		0.093			
1.5		E		E					
0.5	A10	A	B10	**1.2**	***C10***	0.7	D10	0.13	
1.0		E		A		0.14		E	
1.5		E		E		E		E	
0.5			B11	A	C11	1.47	D11	A	
1.0				E		A		E	
1.5				E		E		E	

Conc in ppm

Bold = > 1 ppm PCBs

E = Rd 2 Extract Only

7

Table 2

Sample Analysis Selection Matrix
ACS NPL Site

		Rd 1 Spls	Rd 2 Spls		Rd 3 Spls	ALL ROUNDS
Sample ID	Depth	Total PCBs	Extract	Total PCBs	Analyze	Total PCBs
APD-SDA1	0.5		E			E
APD-SDA1	1.0		E			E
APD-SDA1	1.5		E			E
APD-SDA2	0.5		E	0.196		0.196
APD-SDA2	1.0		E			E
APD-SDA2	1.5		E			E
APD-SDA3	0.5		E			E
APD-SDA3	1.0		E			E
APD-SDA3	1.5		E			E
APD-SDA4	0.5		E			E
APD-SDA4	1.0		E			E
APD-SDA4	1.5		E			E
APD-SDA5	0.5		E	0.007		0.007
APD-SDA5	1.0		E			E
APD-SDA5	1.5		E			E
APD-SDA6	0.5		E			E
APD-SDA6	1.0		E			E
APD-SDA6	1.5		E			E
APD-SDA7	0.5		E			E
APD-SDA7	1.0		E			E
APD-SDA7	1.5		E			E
APD-SDA8	0.5		E			E
APD-SDA8	1.0		E			E
APD-SDA8	1.5		E			E
APD-SDA8 Dup	0.5		E			E
APD-SDA8 Dup	1.0		E			E
APD-SDA8 Dup	1.5		E			E
APD-SDA8 (1)	0.5		E			E
APD-SDA8 (1)	1.0		E			E
APD-SDA8 (1)	1.5		E			E
APD-SDA9	0.5		E	0.32		0.32
APD-SDA9	1.0		E			E
APD-SDA9	1.5		E			E
APD-SDA10	0.5		E		A	A
APD-SDA10	1.0		E			E
APD-SDA10	1.5		E			E
APD-SDB1	0.5	0.056				0.056
APD-SDB1	1.0					
APD-SDB1	1.5					
APD-SDB1 Dup	0.5		E	ND		ND
APD-SDB1 Dup	1.0					
APD-SDB1 Dup	1.5					
APD-SDB2	0.5		E			E
APD-SDB2	1.0		E			E
APD-SDB2	1.5		E			E
APD-SDB3	0.5		E			E
APD-SDB3	1.0		E			E
APD-SDB3	1.5		E			E
APD-SDB4	0.5		E	0.106		0.106
APD-SDB4	1.0		E			E
APD-SDB4	1.5		E			E

Table 2

Sample Analysis Selection Matrix
ACS NPL Site

Sample ID	Depth	Rd 1 Spls Total PCBs	Rd 2 Spls Extract	Rd 2 Spls Total PCBs	Rd 3 Spls Analyze	ALL ROUNDS Total PCBs
APD-SDB5	0.5	1.51				1.51
APD-SDB5	1.0		E	ND		ND
APD-SDB5	1.5		E			E
APD-SDB6	0.5		E	0.72		0.72
APD-SDB6	1.0		E			E
APD-SDB6	1.5		E			E
APD-SDB7	0.5		E		A	A
APD-SDB7	1.0		E			E
APD-SDB7	1.5		E			E
APD-SDB8	0.5		E	0.412		0.412
APD-SDB8	1.0		E			E
APD-SDB8	1.5		E			E
APD-SDB9	0.5	14.1				14.1
APD-SDB9	1.0		E	0.068		0.068
APD-SDB9	1.5		E			E
APD-SDB10	0.5		E	1.2		1.2
APD-SDB10	1.0		E		A	A
APD-SDB10	1.5		E			E
APD-SDB11	0.5		E		A	A
APD-SDB11	1.0		E			E
APD-SDB11	1.5		E			E
APD-SDC1	0.5					
APD-SDC1	1.0					
APD-SDC1	1.5					
APD-SDC2	0.5	0.21				0.211
APD-SDC2	1.0					
APD-SDC2	1.5					
APD-SDC3	0.5					
APD-SDC3	1.0					
APD-SDC3	1.5					
APD-SDC4	0.5	0.432				0.432
APD-SDC4	1.0					
APD-SDC4	1.5					
APD-SDC5	0.5		E	ND		ND
APD-SDC5	1.0		E			E
APD-SDC5	1.5		E			E
APD-SDC6	0.5	1.89				1.89
APD-SDC6	1.0		E	ND		ND
APD-SDC6	1.5		E			E
APD-SDC7	0.5		E	0.65		0.65
APD-SDC7	1.0		E		A	A
APD-SDC7	1.5		E			E
APD-SDC7 Dup	0.5		E	20		20
APD-SDC7 Dup	1.0		E			E
APD-SDC7 Dup	1.5		E			E
APD-SDC8	0.5	73				73
APD-SDC8	1.0		E	0.12		0.12
APD-SDC8	1.5		E			E
APD-SDC9	0.5	SD33=126				SD33=126
APD-SDC9	1.0	0.093				0.093
APD-SDC9	1.5					

9

Sample Analysis Selection Matrix
ACS NPL Site

Table 2

Sample ID	Depth	Rd 1 Spls Total PCBs	Rd 2 Spls Extract	Rd 2 Spls Total PCBs	Rd 3 Spls Analyze	ALL ROUNDS Total PCBs
APD-SDC10	0.5	0.7				0.7
APD-SDC10	1.0		E	0.144		0.144
APD-SDC10	1.5		E			E
APD-SDC11	0.5		E	1.47		1.47
APD-SDC11	1.0		E		A	A
APD-SDC11	1.5		E			E
APD-SDD1	0.5					
APD-SDD1	1.0					
APD-SDD1	1.5					
APD-SDD1 Dup	0.5					
APD-SDD1 Dup	1.0					
APD-SDD1 Dup	1.5					
APD-SDD2	0.5					
APD-SDD2	1.0					
APD-SDD2	1.5					
APD-SDD3	0.5	0.319				0.319
APD-SDD3	1.0					
APD-SDD3	1.5					
APD-SDD4	0.5					
APD-SDD4	1.0					
APD-SDD4	1.5					
APD-SDD5	0.5		E			E
APD-SDD5	1.0		E			E
APD-SDD5	1.5		E			E
APD-SDD6	0.5		E	ND		ND
APD-SDD6	1.0		E			E
APD-SDD6	1.5		E			E
APD-SDD7	0.5	0.65				0.648
APD-SDD7	1.0					
APD-SDD7	1.5					
APD-SDD8	0.5		E	0.044		0.044
APD-SDD8	1.0		E			E
APD-SDD8	1.5		E			E
APD-SDD9	0.5	0.021				0.021
APD-SDD9	1.0					
APD-SDD9	1.5					
APD-SDD10	0.5		E	0.13		0.13
APD-SDD10	1.0		E			E
APD-SDD10	1.5		E			E
APD-SDD11	0.5		E		A	A
APD-SDD11	1.0		E			E
APD-SDD11	1.5		E			E
APD-SDE6	0.5		E			E
APD-SDE6	1.0		E			E
APD-SDE6	1.5		E			E
APD-SDE6 Dup	0.5		E			E
APD-SDE6 Dup	1.0		E			E
APD-SDE6 Dup	1.5		E			E
APD-SDE7	0.5					
APD-SDE7	1.0					
APD-SDE7	1.5					

10

Sample Analysis Selection Matrix
ACS NPL Site

Table 2

		Rd 1 Spls	Rd 2 Spls		Rd 3 Spls	ALL ROUNDS
Sample ID	Depth	Total PCBs	Extract	Total PCBs	Analyze	Total PCBs
APD-SDE8	0.5		E			E
APD-SDE8	1.0		E			E
APD-SDE8	1.5		E			E
APD-SD T1 (A)	0.5		E	0.81		0.81
APD-SD T1 (A)	1.0		E			E
APD-SD T1 (A)	1.5		E			E
APD-SD T1 (B)	0.5	10.2				10.2
APD-SD T1 (B)	1.0		E	0.063		0.063
APD-SD T1 (B)	1.5		E			E
APD-SD T1 (C)	0.5	14.4				14.4
APD-SD T1 (C)	1.0		E	0.461		0.461
APD-SD T1 (C)	1.5		E			E
APD-SD T1 (D)	0.5	5.21				5.21
APD-SD T1 (D)	1.0		E	0.198		0.198
APD-SD T1 (D)	1.5		E			E
APD-SD T1 (E)	0.5		E	0.237		0.237
APD-SD T1 (E)	1.0		E			E
APD-SD T1 (E)	1.5		E			E
APD-SD T2 (A)	0.5		E	0.26		0.26
APD-SD T2 (A)	1.0		E		A	A
APD-SD T2 (A)	1.5		E			E
APD-SD T2 (B)	0.5	7.23				7.23
APD-SD T2 (B)	1.0		E	0.313		0.313
APD-SD T2 (B)	1.5		E			E
APD-SD T2 (C)	0.5	359				359
APD-SD T2 (C)	1.0		E	1.8		1.8
APD-SD T2 (C)	1.5		E		A	A
APD-SD T2 (D)	0.5	29				29.1
APD-SD T2 (D)	1.0		E	3.8		3.8
APD-SD T2 (D)	1.5		E		A	A
APD-SD T2 (D) Dup	0.5		E	ND		ND
APD-SD T2 (D) Dup	1.0		E	ND		ND
APD-SD T2 (D) Dup	1.5		E			E
APD-SD T2 (E)	0.5		E	ND		ND
APD-SD T2 (E)	1.0		E			E
APD-SD T2 (E)	1.5		E			E
APD-SD T3 (A)	0.5		E	11.60		11.6
APD-SD T3 (A)	1.0		E		A	A
APD-SD T3 (A)	1.5		E			E
APD-SD T3 (B)	0.5	234				234
APD-SD T3 (B)	1.0		E	27		27
APD-SD T3 (B)	1.5		E		A	A
APD-SD T3 (C)	0.5	SD35=17				SD35=17
APD-SD T3 (C)	1.0	0.28				0.281
APD-SD T3 (C)	1.5					
APD-SD T3 (D)	0.5	15.7				15.7
APD-SD T3 (D)	1.0		E	0.15		0.15
APD-SD T3 (D)	1.5		E			E
APD-SD T3 (E)	0.5		E	0.72		0.72
APD-SD T3 (E)	1.0		E			E
APD-SD T3 (E)	1.5		E			E

Sample Analysis Selection Matrix
ACS NPL Site

Table 2

								ALL
		Rd 1 Spls		Rd 2 Spls			Rd 3 Spls		ROUNDS
Sample ID	Depth	Total PCBs		Extract	Total PCBs		Analyze		Total PCBs
APD-SD T4 (A)	0.5						A		A
APD-SD T4 (A)	1.0								
APD-SD T4 (A)	1.5								
APD-SD T4 (B)	0.5	0.15							0.154
APD-SD T4 (B)	1.0								
APD-SD T4 (B)	1.5								
APD-SD T4 (C)	0.5	SD21=13							SD21=13
APD-SD T4 (C)	1.0	60							60
APD-SD T4 (C)	1.5			E	11.2				11.2
APD-SD T4 (D)	0.5	0.81							0.812
APD-SD T4 (D)	1.0								
APD-SD T4 (D)	1.5								
APD-SD T4 (E)	0.5								
APD-SD T4 (E)	1.0								
APD-SD T4 (E)	1.5								
APD-Culvert Outfall	0.5	2.08							2.08
APD-Culvert Outfall	1.0			E	0.028				0.028
APD-Culvert Outfall	1.5			E					E
APD-Culvert Downstream	0.5	0.29							0.288
APD-Culvert Downstream	1.0								
APD-Culvert Downstream	1.5								
APD-Culvert Upstream (1)	0.5	0.099							0.099
APD-Culvert Upstream (1)	1.0								
APD-Culvert Upstream (1)	1.5								
APD-Culvert Upstream (2)	0.5	ND							ND
APD-Culvert Upstream (2)	1.0								
APD-Culvert Upstream (2)	1.5								
APR-Rinsate	1								
Total		28		0	57		0		

Notes:
All sediment samples collected November 20 and 21, 1996 are included here.

Total PCBs = sum of PCB results (generally ARs 1248, 1254, and 1260), converted to mg/kg.
E = Extraction requested (extracts have a holdtime of 40 days after the extraction date).

Round 1 = samples from 0.5' (or 1.0' for C9 & T4(C)) as selected by agencies. Earlier sediment samples collected at grid points are also included for reference.
Round 2 = Analyze all samples on each side and beneath any Rd 1 samples > 1 ppm PCBs. Extract samples further out to meet reasonable worst case scenario.
Round 3 = Analyze samples extracted in Round 2 using same criteria as Rd 2.