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January 7, 2016

Ms. Maryam Tasnif-Abassi
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

SITE: FORMER AGRICULTURAL PARK
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

RE: SOIL EXCAVATION WORK PLAN

Dear Ms. Tasnif-Abassi:

This Work Plan is provided to describe upcoming activities that will be conducted at the former Riverside Agricultural Park located at 7020 Crest Avenue in Riverside, California. Based on recent soil sampling efforts as documented in the *Former Riverside Agricultural Park Soil Sampling Report* dated January 6, 2016, it was determined that surface soil with polychlorinated biphenyl (PCB) concentrations above the cleanup goal of 0.23 milligrams per kilogram (mg/kg) was present at select locations. A description of previous remediation activities and planned future work activities are presented in this Work Plan.

Phase I Activities - 2009

The scope of the first phase of soil removal was to excavate, remove, and properly dispose of soils containing PCB concentrations in excess of 50 mg/kg from locations determined by previous Site investigation efforts. In addition, soil samples were collected from select locations and analyzed for dioxins, furans and metals.

The remedial excavation alternative selected for the project included the removal, transportation, and proper disposal of PCB and metals-impacted soil. Between April and July 2009, Friends of the Riverside Airport LLC (FRA) removed soil containing PCB concentrations above 50 mg/kg. All remedial excavation activities were completed in July 2009. Excavation areas were concluded only after all confirmation samples from the excavation sidewalls and bottoms returned laboratory data results that verified the remaining soil was <50 mg/kg for PCBs.

All excavated soil with PCB concentrations at or above 50 mg/kg was transported offsite to the Waste Management, Incorporated, Kettleman Hills facility in Kettleman City, California. Soil containing PCB concentrations above 50 mg/kg at locations identified during previous Site

characterization efforts has been removed, transported offsite, and disposed of properly. A total of ~8,666 tons of PCB- and /or metals-impacted soil were transported offsite for disposal. Additional items removed from the site include brush debris (green waste), PCB-contaminated concrete, sewer pipe, and utility poles.

A total of 31 soil samples were analyzed for dioxin/furan congeners. Of the samples analyzed, 13 contained 2,3,7,8-TCDD Equivalent concentrations in excess of the health-based screening level for residential land-use (i.e., 4.5 picograms per gram [pg/g] or 4.5E-6 mg/kg). This health-based screening level represents the USEPA Regional Screening Level (RSL) established by Region IX (USEPA, 2008). The samples that contained the highest concentrations of 2,3,7,8-TCDD Eq. are TP-30E (4,817.7), TP-30S (8,372.8), and TP-30W (300.7). These three samples are co-located with PCB-impacted soil. Six additional samples exceeded the health-based screening level (B-67, TP-29, S-22+20E, TP-30N, TP-30B, and TP-103). These nine samples are co-located with PCB-impacted areas, and were removed during Phase 2 mass grading activities.

Phase II Activities – 2013/2014

The scope of the second phase of soil removal was to excavate, remove, and properly dispose of soils containing PCB concentrations in excess of 0.22 mg/kg from locations determined by previous site investigation efforts. In addition, soil samples were collected from select locations and analyzed for dioxins, furans and metals.

Between July 2013 and January 2014, FRA removed soil containing PCB concentrations above 0.22 mg/kg. Excavation areas were concluded only after all confirmation samples from the excavation sidewalls and bottoms returned laboratory data results that verified the remaining soil was <0.22 mg/kg for PCBs.

PCB-impacted soil (165,226.64 tons) generated during excavation activities was characterized as a non-hazardous waste and transported to the Waste Management, Inc. Azusa Land Reclamation facility in Azusa, California, for recycling. Additional materials that were removed from the Site included clean soil (30,782 tons), concrete (4,481.37 tons), green waste (422.26 tons), and asbestos-cement pipe (50.82 tons).

Thirteen dioxin/furan-impacted locations identified during Phase 1 activities were addressed by conducting additional excavation and confirmation sampling. Of the 50 confirmation samples collected, 17 were above the health-based screening level (4.5 pg/g). Consequently, additional soil was removed from these locations and more confirmation samples were collected. This procedure was repeated until all final confirmation sample results were below 4.5 pg/g.

Planned Remediation Activities for 2016

- Start Date - January 2016
- Estimated schedule – 1 month
- Scope of Work
  - The activities will be conducted in accordance with the FREY Environmental, Inc. *Revised Response Plan – Excavation of Soils Containing PCBs* dated June 19, 2006. Specifically, the work will be conducted in accordance with Section 7.9 of the *Revised Response Plan - Excavation of Soils Containing Greater Than 50 mg/kg of PCBs,* and Section 7.10 *Excavation of Soils Containing Less Than 50 mg/kg of PCBs*. These sections are provided as Appendix A of this Work Plan.
  - In general, soil at grid locations equal to or exceeding 0.23 mg/kg of PCBs (the current RSL) will be excavated and removed from the site. A 10′ wide by 10′ long by 2′ deep excavation will be made at each location. Confirmation soil samples will be collected from the bottom and sidewalls of the excavations. The proposed locations are shown on Figure 1. Confirmation soil samples will be collected following excavation. If confirmation soil samples exceed 0.23 mg/kg for PCBs, additional excavation and confirmation sampling will be conducted.
  - Excavations created during these additional remediation activities will be backfilled and compacted. The import soil will come from a stockpile located south of Jurupa Avenue near the intersection of Jurupa Avenue and Van Buren Boulevard approximately 0.4 mile east of the site. This stockpile has been tested and meets the DTSC criteria for import fill soil. Analytical results are available and will be sent to DTSC for approval prior to beginning backfill activities.
- Offsite Soil Disposal
  - The proposed soil disposal facility for soil containing PCBs below 50 mg/kg is the Waste Management, Incorporated facility at 2801 Madera Road, Simi Valley, California.
  - The proposed soil disposal facility for soil containing PCBs at or above 50 mg/kg is the Waste Management facility at 35251 Old Skyline Road, Kettleman City, California.
  - Proposed haul route maps are provided as Figures 2 and 3.
- TRC will provide field oversight of excavation activities and will perform confirmation soil sampling.
  - TRC site superintendent - Mike Kilbarger (mobile # 562-577-9207).
- Following the completion of excavation activities, a summary report will be prepared.

- The report will include findings, tabulated laboratory results, sample location figures, and copies of manifests.
- A post-removal health risk analysis will be included in the report.

The soil samples collected during confirmation sampling will be analyzed for PCBs using EPA Method 8082 with extraction by Method 3545. The contract laboratory for this sampling effort will be Enthalpy Analytical, Inc. (formerly Associated Laboratories) in Orange, California. Chain of custody protocol will be followed for all samples. The chain of custody form accompanies the samples from the sampling locality to the laboratory, providing a continuous record of possession prior to analysis.

A site-specific health and safety plan will be prepared by TRC and will be available at the site for use by TRC personnel and agency representatives.

The sampling requirements described in this Work Plan can be modified in the field by DTSC or EPA if necessary to meet project objectives.

If you have any comments, please contact David Lennon at (949) 341-7458.

Sincerely,

David Lennon
Principal Consultant

Ross Surrency, PG
Senior Project Geologist

Attachment: Figure 1 - Proposed Soil Sample Locations
Figure 2 - Soil Transportation Route to Van Buren Boulevard
Figure 3 - Soil Transportation Route from Van Buren Boulevard to Highway 60
Appendix A: Excerpts from the Frey Response Plan

cc: Sara Ziff, EPA (electronic copy)
Katherine Baylor, EPA (electronic copy)
Greg Neal, DTSC (electronic copy)

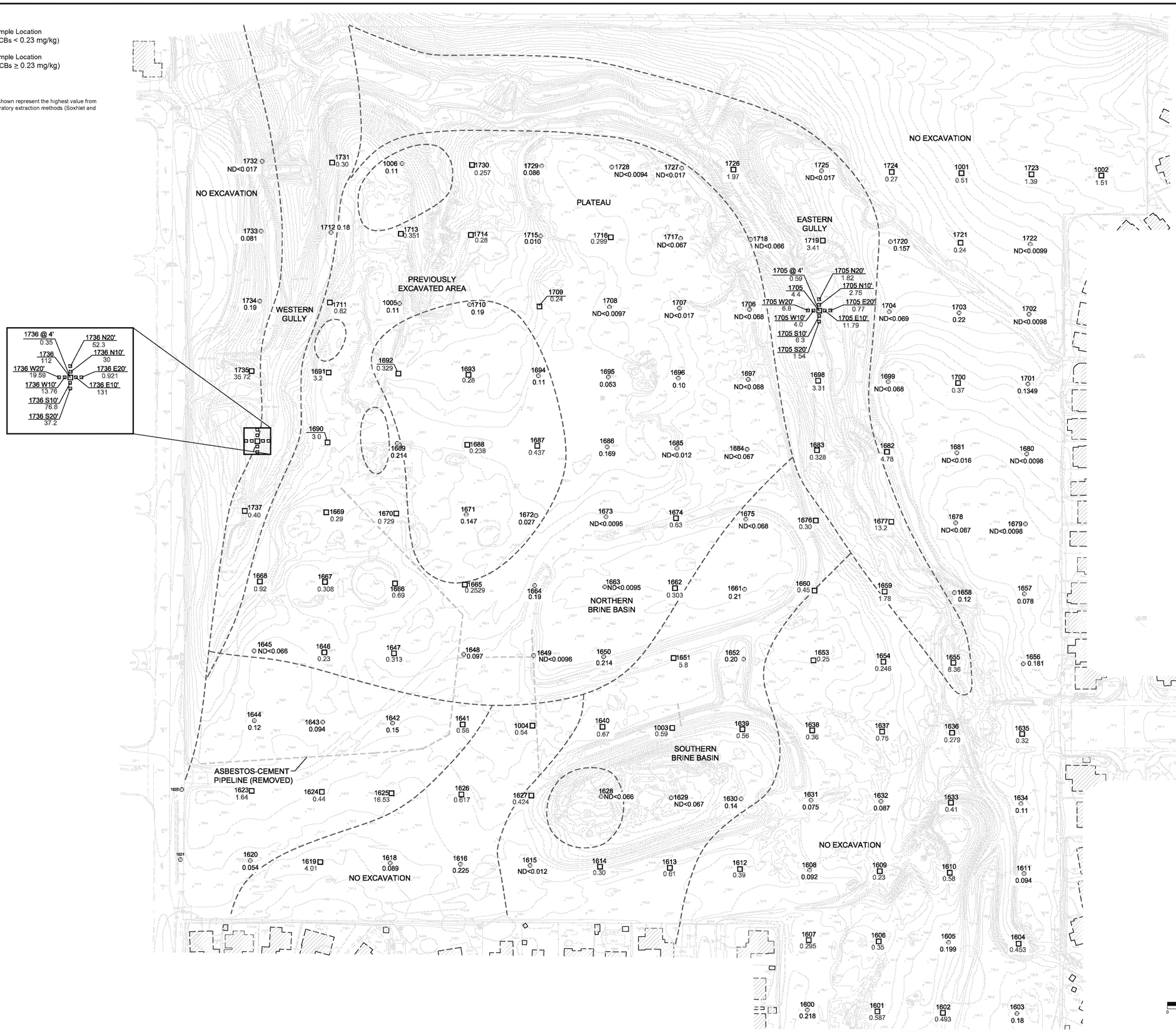
LEGEND

1732 0.18 PCB Sample Location (Total PCBs < 0.23 mg/kg)

1731 131 PCB Sample Location (Total PCBs ≥ 0.23 mg/kg)

NOTES:

PCB concentrations shown represent the highest value from the two different laboratory extraction methods (Soxhlet and Method 3545).



N

DRAFT - ISSUED FOR REVIEW

REV	DATE	BY	APP	DESCRIPTION
	12/17/2015			

DESIGNED	DATE	DRAWN BY	DATE	CHECKED	DATE
R.S.	12/17/15	R.M.C.	12/17/15	R.S.	12/17/15

TRC
9685 RESEARCH DRIVE
IRVINE, CALIFORNIA 92618
(949) 727-9336

PROJECT: 234976.0000.0000

FACILITY: FORMER AGRICULTURAL PARK
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

TITLE: GRID SAMPLE LOCATIONS NOVEMBER 2015

REVISION: -

SHEET: 1

FILE NAME: FRA RIVERSIDE-SP-REV2015.dwg

DATE: 12/17/2015

Page: 1 of 2

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SCALE (FEET)

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NOTE:

Map provided by Google Earth Professional, dated 6/7/12.

TRC

PROJECT: 167991

FACILITY:

FRIENDS OF THE RIVERSIDE AIRPORT, LLC
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

SOIL TRANSPORTATION ROUTE TO VAN BUREN BOULEVARD

FIGURE 2

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LEGEND

Soil Transportation Route

SCALE (FEET)

0 4,000

NOTE:

Map provided by Google Earth Professional, dated 6/7/12.

TRC

PROJECT: 167991

FACILITY:

FRIENDS OF THE RIVERSIDE AIRPORT, LLC
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

SOIL TRANSPORTATION ROUTE FROM VAN BUREN BOULEVARD TO HIGHWAY 60

FIGURE 3

APPENDIX A

EXCERPTS FROM FREY RESPONSE PLAN

REVISED RESPONSE PLAN
EXCAVATION OF SOILS CONTAINING PCBS
AGRICULTURAL PARK
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

Prepared for:

FRIENDS OF THE RIVERSIDE AIRPORT LLC
8175 Limonite Avenue
Riverside, CA 92509

Prepared by:

FREY Environmental, Inc.
2817A Lafayette Ave.
Newport Beach, California 92663-3715
(949) 723-1645

Project No.: 485-01

June 19, 2006

7.8 EXCAVATION OF SOILS CONTAINING GREATER THAN 1,000 MG/KG OF PCBS

Six soil samples previously collected by FREY and Geomatrix contained concentrations of PCBs in excess of 1,000 mg/kg. Soil samples TP29-0.5 (3,100 mg/kg), B37-0.75 (3,877 mg/kg), B37- 1.5 (1,092 mg/kg), B47-1.5 (2,181 mg/kg), B67-0.75 (9,560 mg/kg) and Sample #1 (1,800 mg/kg) contained total PCB concentrations in excess of 1,000 mg/kg. Sample locations are shown on Figure 2. These boring and test pit locations will be staked by a State of California Registered Land Surveyor prior to excavation.

An approximate 10 foot by 10 foot area will be excavated around the four locations noted above. Soils will be excavated to depths of approximately 2 feet bgs in the areas of B37, B47 and TP29. Soils will be excavated to a depth of approximately 1 foot bgs in the area of boring B67 and Sample #1. It is estimated that a total of 50 tons of soil will be removed from these areas using an excavator. These soils will be loaded directly onto trucks licensed to haul hazardous waste and transported to a Class I disposal facility owned and operated by WMI.

One soil sample will be collected from the base of each of the four excavation areas and from the center of each excavation sidewall immediately after excavation to confirm that soils containing concentrations of PCBs in excess of 1,000 mg/kg have been removed from the Site. The soil samples will be analyzed on a 24 hour turnaround. In addition, the confirmation soil samples collected from the TP29 excavation will also be analyzed for Title 22 metals.

A minimum 5 foot by 5 foot area of soil will be excavated around a confirmation sample if that sample contains PCBs in excess of 1,000 mg/kg. The 5 foot square area will be excavated to a minimum depth of one foot below the elevation at which the concentration of 1,000 mg/kg was detected. Soil samples will be collected from the base of the additional excavation and from center of each sidewall. These additional soil samples will be analyzed for PCBs. This operation will be repeated until soils containing greater than 1,000 mg/kg of PCBs have been removed from the Site.

The location and elevation of each soil sample will be surveyed by a State of California Registered Land Surveyor on the day of sample collection. The surveyor will record the sample number and corresponding northing and easting, and the northing and easting of each of the four excavation boundaries, into a record book which will be maintained in the on Site office. The surveyor will record the information in a duplicate record book which will be stored in a secure off-Site location.

7.9 EXCAVATION OF SOILS CONTAINING GREATER THAN 50 MG/KG OF PCBS

A total of 62 soil samples, out of the 658 soil samples collected and analyzed during previous investigations, contained concentrations of PCBs between 50 mg/kg and 1,000 mg/kg. Soils which contain between 50 mg/kg and 1,000 mg/kg of PCBs are primarily located in the area of the former sewage treatment plant and sludge beds with an additional area located in the western portion of the southern brine basin. Figure 9 presents the areas of the Site which will initially be excavated to

remove soils containing concentrations of PCBs in excess of 50 mg/kg. The surface area is estimated to be 3.5 acres. Of the 62 soil samples, 49 were collected from depths of 0.5 feet bgs or 0.75 feet bgs, 9 soil samples were collected from depths of 1.5 feet bgs, 2 soil samples were collected from 2.5 feet bgs and one sample was collected from a depth of 15 feet bgs.

The surveyor will locate and stake the previous boreholes, test pits and surface soil sample locations which comprise the lateral extent of soils which contain concentrations of PCBs in excess of 50 mg/kg. The exclusion zone as discussed in the health and safety plan will incorporate the approximate area outlined by the surveyor.

Soils will be excavated to an initial depth of 1.25 feet over the area outlined in Figure 9. A bulldozer will be used to rip the soils to a depth of approximately 1 foot bgs. Two scrappers will be used to remove the surficial first foot of "ripped" soil in addition to an additional 0.25 feet of soil. Areas not suitable for scrapper work will be removed with an excavator or backhoe to the specified depth. The excavated soil will be hauled by scrapper to the designated stockpile area.

At the completion of this phase of excavation, the surveyor will re-stake the location of borings B38, B53, B58, B67, B70, B80, B85, B93, B136 and B136A, trench pits TP30 and TP39 and MW7 (Figure 9). These areas will be excavated to depths anticipated to range from 1.5 feet bgs to 3 feet bgs. Figure 9 shows the proposed location of bottom samples for this phase of the excavation.

An approximate 10 foot by 10 foot area will be excavated around MW7 and extended to an estimated depth of 18 feet bgs. Soil samples collected from MW7 from depths of 15 feet bgs and 20 feet bgs contained 330 mg/kg and 0.130 mg/kg of PCBs. Excavation to these depths is anticipated to be difficult. Standard excavation methods as well as the use of a pneumatic breaker will be employed to allow for the excavation of soils at depth. One soil sample will be collected from each sidewall of the MW7 excavation and from the bottom of the MW7 excavation. In the event that soils containing greater than 0.220 mg/kg of PCBs can not be excavated, then these soils will be incorporated into the risk assessment as detailed in Appendix J.

Neptune conducted a statistical analysis of data collected in order to provide a statistically defensible number of confirmation soil samples required to determine whether the Site is suitable for residential development. Neptune concluded that a grid interval of 125 feet could be implemented (which would yield a total of 10 confirmation soil samples) over the approximate 3.5 acre excavated area. Thus, a grid will be constructed with sample collection points at the intersection of each north-south and east-west grid line. For discussion purposes, the origin of the grid could conveniently be located at existing groundwater monitoring well GMW-2. Construction of a grid in this fashion yields a total of 13 confirmation soil samples over the approximate 3.5 acre area. Neptune's statistical memorandum dated July 5, 2005 has been attached in Appendix G. Figure 9 presents confirmation soil sample locations for the excavation of soils containing greater than 50 mg/kg of PCBs.

In the event that a confirmation soil sample contains greater than 50 mg/kg of PCBs, then soil samples will be collected 20 feet to the east, west, north and south of the sample containing greater than 50 mg/kg of PCBs. In the event that all four samples contain less than 50 mg/kg of PCBs, then one vertical foot of soil will be excavated from the area. One soil sample will be collected from the newly excavated bottom and submitted for laboratory analyses. This process will be repeated until concentrations of soils containing PCBs in excess of 50 mg/kg have been removed.

The surveyor will record the location and elevation of each soil sample collected on the same date as the sample collection. The surveyor will record the sample number and corresponding northing and easting of each soil sample into a record book which will be maintained in the on Site office. The surveyor will record the information in a duplicate record book which will be stored in a secure off-Site location.

It has been estimated that 11,000 tons of soils containing concentrations of PCBs in excess of 50 mg/kg but less than 1,000 mg/kg will be excavated from the Site and stockpiled on plastic in the southwestern area of the Site in an approximate area outlined by test pits TP11, TP65, TP98 and B22. This location has been selected for soil stockpiling based on the prevailing wind direction of west to east. In the downwind direction, the nearest residential homes will be located nearly 1,200 feet from the soil pile.

7.10 EXCAVATION OF SOILS CONTAINING LESS THAN 50 MG/KG OF PCBS

Soils which contain less than 50 mg/kg but greater than 0.220 mg/kg of PCBs comprise the greatest volume of soil required to be removed from the Site. As shown on Figure 10, soils containing concentrations of PCBs in excess of 0.220 mg/kg are located over an approximate surficial area of 35 to 40 acres and will be excavated as the final phase to this remedial project. Soils from these areas may also be excavated concurrently with soils containing greater than 50 mg/kg of PCBs depending upon Site conditions.

The excavation of soils containing less than 50 mg/kg but greater than 0.22 mg/kg of PCBs will be conducted in five separate areas of the Site: 1) isolated areas, 2) previously excavated areas, 3) the eastern gully, 4) the western gully, and; 5) the remaining area.

7.10.1 Confirmation Soil Sampling Frequency

On page 5 of their July 5, 2005 memorandum (Appendix F), Neptune concludes that 10 soil samples per sub-area are sufficient to statistically determine that the Site is "clean" (i.e. remaining soils contain less than 0.22 mg/kg of PCBs). According to Neptune, 10 confirmation samples would need to be collected from each of the following areas: 1) isolated areas, 2) previously excavated areas, 3) eastern gully, 4) western gully, and; 5) the remaining areas of the Site. Thus, a total of 50 soil samples has been statistically determined to be sufficient to state that soils remaining on Site contain less than 0.22 mg/kg of PCBs. DTSC memorandums dated November 16, 2005, February 7, 2006

and May 5, 2006 requested that additional soil samples be collected and analyzed for PCBs. These soil sample locations have been incorporated into Figure 10. In addition, these proposed confirmation soil sample locations have been tabulated as shown on Table 19. DTSC will provide oversight for the collection of post-excavation confirmation samples, and the DTSC geologist may modify the locations and depths of the samples based on field conditions.

7.10.2 Isolated Areas of the Site

The surveyor will locate previously collected soil sample borings and test pit locations which contained PCBs but were surrounded by soil samples which did not contain PCBs. For example, soil sample SS70 was collected near the eastern property line and contained 2.5 mg/kg of PCBs. The nearest soil samples to SS70, soil samples from B161, TP17 and TP54, either did not contain PCBs or contained PCBs in concentrations less than 0.220 mg/kg.

A 10 foot by 10 foot section of soil will be excavated to a depth of one foot bgs in the location of SS70. An excavation area of 10 feet by 10 feet is proposed as soil samples collected from adjacent locations less than 10 feet away (for example TP17) were either non-detect for PCBs, or contained PCBs in concentrations below 0.220 mg/kg.

Following Neptune's statistical analyses, two confirmation soil samples will be collected from each of the isolated soil sample locations (SS54, SS56, SS70, TP4 and TP76) after excavation and submitted for laboratory analyses. If concentrations of PCBs are present in the confirmation samples in excess of 0.220 mg/kg, then an additional 10 foot by 10 foot section, 1 foot deep, shall be excavated around the sample which contained PCBs. Two additional confirmation soil samples shall be collected from the newly excavated surface and submitted for laboratory analyses. This process will be repeated until soils containing PCBs in excess of 0.220 mg/kg have been removed.

All soil sampling locations will be surveyed for northing, easting and elevation by a State of California registered land surveyor.

This excavated soil will be stockpiled on plastic adjacent to each excavated area to ensure soil containing PCBs does not come into contact with soils which do not contain PCBs. At the termination of excavation activities at each isolated location, soils will be transported by backhoe to a stockpile designated area located in the southwestern portion of the Site.

7.10.3 Excavation of Soils from the Eastern Gully and Western Gully

Eastern Gully

A significant amount of concrete will be removed from the eastern gully. The eastern gully will initially be excavated to a depth of 1.5 feet bgs, or to bedrock, whichever is less, based upon the soil samples results collected from TP16, TP26, TP36 and TP44 and soil boring B163. Soils will be excavated to a depth of 3 feet in the location of test pit TP16 as the soil sample collected from 2 feet bgs contained PCBs at a concentration of 0.39 mg/kg and to a depth of 5 feet bgs at the location of EarthSafe B-18 (i.e. 1.58 mg/kg of PCBs at 3 feet bgs).

The eastern gully is a somewhat linear feature estimated to be approximately 1,800 feet in length and 6 acres in size. Neptune's statistical analyses states that 10 confirmation soil samples will need to be collected from the eastern gully to confirm soils containing PCBs have been removed. The DTSC memorandum dated February 7, 2006 requested an additional 16 soil sidewall samples be collected in the eastern gully. In addition, two areas (B-18 and TP16) in the eastern gully will be excavated to greater depths than the surrounding areas. Thus, a total of 36 soil samples will be collected from the eastern gully and submitted for laboratory analyses. Figure 10 shows the proposed soil sample locations. Specific sampling locations will be determined by the presence of bedrock and previously analyzed soils samples collected near or in the gully which contained PCBs.

Soil samples will be surveyed for location and elevation by the surveyor. In the event that a soil sample contains greater than 0.220 mg/kg of PCBs, then a 20 foot by 20 foot area will be excavated one additional vertical foot and two additional soil samples collected from the freshly excavated surface. This pattern will continue until soils which contain greater than 0.220 mg/kg of PCBs have been excavated from the eastern gully.

Western Gully

The gully located on the west side of the Site is heavily vegetated. Vegetation will be removed from the gully and disposed of as green-waste. Bedrock is reportedly located at depths as shallow as 2-feet bgs in the western gully. Soils will be excavated from the gully bottom to a depth of 2.5 feet or until bedrock is encountered.

Neptunes statistical analyses states that 10 confirmation soil samples will need to be collected from the western gully to confirm soils containing PCBs have been removed. The western gully area is estimated to be approximately 3.5 acres in size. The February 7, 2006 DTSC memorandum requested an additional 12 soil sidewall samples be collected in the eastern gully. Thus, a total of 23 soil samples will be collected from the western gully and submitted for laboratory analyses. Figure 10 shows the proposed soil sample locations. Specific sampling locations will be determined by the presence of bedrock and previously analyzed soil samples collected near or in the gully which contained PCBs.

Soil samples will be surveyed for location and elevation by the surveyor. In the event that a soil sample contains greater than 0.220 mg/kg of PCBs, then a 20 foot by 20 foot area will be excavated one additional vertical foot and two additional soil samples collected from the freshly excavated surface. This pattern will continue until soils which contain greater than 0.220 mg/kg of PCBs have been excavated from the eastern gully.

7.10.4 Previously Excavated Areas

The areas of the Site proposed to be excavated as described in 7.8 and 7.9 will be excavated to additional depths ranging from 2.5 feet to approximately 18 feet bgs (at groundwater monitoring wells MW7 and MW8) to remove soils which contain PCBs in concentrations greater than 0.220 mg/kg. The surveyor will plot borehole and test pit locations in this area which require additional excavation.

For example, soil samples collected from boring B36 from depths of 0.75 feet bgs and 1.5 feet bgs contained concentrations of PCBs of 103.2 mg/kg and 27.920 mg/kg, respectively. However, the soil sample collected from 3 feet bgs did not contain PCBs. Therefore, this area will be initially excavated to 1.25 feet bgs (as described in Section 7.8) to remove soils containing PCBs in excess of 50 mg/kg. Soils will then be further excavated to 2.5 feet bgs to remove soils containing PCBs in excess of 0.22 mg/kg. It is not anticipated that soils will be excavated to depths of greater than 2.5 feet bgs as the soil sample collected from B36 from 3 feet bgs did not contain PCBs. A confirmation sample will be collected from the location of B36 at the base of the excavation to confirm the removal of PCB impacted soils.

A second example would be soil samples collected from test pit TP29. The soil sample collected from 7.5 feet bgs contained PCBs at a concentration of 0.93 mg/kg while the sample collected from 10 feet bgs contained a PCB concentration of 0.12 mg/kg. This area will be excavated to a depth of 8 feet bgs.

An approximate 10 foot by 10 foot area will be excavated around MW8 and extended to an estimated depth of 18 feet bgs. Soil samples collected from MW8 from depths of 15 feet bgs and 20 feet bgs contained 1.5 mg/kg and less than 0.050 mg/kg of PCBs (non detect). Excavation to these depths is anticipated to be difficult. Standard excavation methods as well as the use of a pneumatic breaker will be employed to allow for the excavation of soils at depth. One soil sample will be collected from each excavation sidewall and from the bottom of the excavation. In the event that soils containing greater than 0.220 mg/kg of PCBs can not be excavated, then these soils will be incorporated into the risk assessment as detailed in Appendix J.

Neptune's statistical analyses states that 10 confirmation soil samples will need to be collected from the area of the Site which was previously excavated to remove soils containing PCBs in excess of 50 mg/kg. This area of the Site is located within the sub-area discussed in Section 7.10.5. Therefore, confirmation soil sampling will be conducted in conjunction with the sub-area discussed in Section 7.10.5

7.10.5 Remaining Areas of the Site

The remaining areas of the Site which have been documented to contain PCBs in concentrations of less than 50 mg/kg but greater than 0.220 mg/kg encompass an estimated area of between 25 and 30 acres. The majority of PCBs in soils in these areas were detected at depths of less than 1 foot. Soils will initially be excavated to a depth of one foot bgs over a majority of this area.

Additional soils will be excavated from areas of the Site where soils containing PCBs in excess of 0.220 mg/kg are present at depths greater than 0.75 feet bgs. The surveyor will locate and stake previously sampled locations documented to contain PCBs at depths in excess of 0.75 feet bgs.

The number of soil confirmation samples required to be collected over the previously excavated area and the remaining area of the Site, to be statistically significant, is 20, according to the analyses performed by Neptune. DTSC memorandums dated November 15, 2005, February 7, 2006 and May 5, 2006 requested the collection of a significant additional number of samples from this subarea. Thus, a total of 145 confirmation soil samples will be collected from this area of the Site. Table 19 lists the confirmation samples by number and Figure 10 contains a graphical presentation of the soil sample locations.

In the event that a confirmation soil sample contains greater than 0.220 mg/kg of PCBs, then soil samples will be collected 20 feet to the east, west, north and south of the sample containing greater than 0.220 mg/kg of PCBs. In the event that all four samples contain less than 0.220 mg/kg of PCBs, then one vertical foot of soil will be excavated from the area. One soil sample will be collected from the newly excavated bottom and submitted for laboratory analyses. This process will be repeated until concentrations of soils containing PCBs in excess of 0.220 mg/kg have been removed.

Additional confirmation soil samples will also be collected from areas excavated to additional depths in comparison to the excavated surface area. For example, soil samples collected from boring B53 indicate that PCBs in excess of 0.220 mg/kg extend to a depth in excess of 5 feet bgs. An approximate 10 foot by 10 foot "pothole" will excavated to a depth of 7 feet bgs at boring B53 while the surrounding surface area is proposed to be excavated to a depth of 2.5 feet bgs. A confirmation soil sample will be collected from the center of the bottom of the excavation and from the center of each sidewall.

Additional areas which will be "potholed" to depths greater than excavated surface areas include the locations of TP9, TP20, TP29, TP69, TP79, TP105, TP109, TP113, B37, B43, B58, B81, MW7 and MW8. Confirmation soil samples will be collected from the center of the bottom and each sidewall. Confirmation soil sample locations have been summarized in Table 19 and presented graphically on Figure 10.

The surveyor will plot the location and elevation of each soil sample on the same date of sample collection. The surveyor will record the sample number and corresponding northing and easting into a record book which will be maintained in the on Site office. The surveyor will record the information in a duplicate record book which will be stored in a secure off-Site location.

Excavated soils will be stockpiled in the southwestern quarter of the Site. Each soil pile will be covered with plastic at the end of each working day or when stockpiling activities have been completed at that particular pile. Any soil pile not subject to work activities will remain covered.

Twenty-one confirmation soil samples will be collected and submitted for dioxin and furan analyses per the DTSCs May 5, 2006 letter. Confirmation soil samples will be collected from the final depth of excavation in the location of B67 (proposed to be 4 feet bgs) and TP29 (proposed to be 8 feet bgs), from a depth of 3 feet bgs at the location of B136, from a depth of 2.5 feet bgs at the location of SS21, B23, TP43, and TP107 and from a depth of 1 foot bgs in the location of TP99 and TP103. In addition, confirmation soil samples will be collected from depths of 0.75 feet from the location of B123, B126, B132, B174, B168, B162, B159, B144, B147 and B148. Finally, confirmation samples will be collected from depths of 0.75 feet bgs from a point 20 feet east of Sample #22 and from a point 20 feet south of Sample #23.

7.11 SOIL SAMPLE COLLECTION PROCEDURES

Confirmation soil samples will be collected by inserting a 4 ounce jar directly into the freshly exposed excavation surface. The glass jars will be filled so that no headspace exists. Teflon tape will be placed over the mouth of each jar. An air tight, screw cap will be tightened on each jar. Each sample will be labeled with the sample number, time, date, sample depth and job number.

The soil samples will then be placed in a cooler chilled with ice. The laboratory, or a courier, will transport the soil samples, following chain of custody procedures to the laboratory at the end of each work day. The soil samples will be analyzed on 24 hour, 72 hour, or five day turnaround as needed. The turnaround time will be dependent upon the urgency of the sample result at the time of collection.

All sampling equipment will be decontaminated using a brush and tap water rinse followed by a brush and TSP solution (non-phosphate soap), a tap water rinse, and a deionized water rinse. All sampling equipment will be dried by air or with a towel prior to sampling. Disposable latex gloves and ziploc bags will be used to prevent cross contamination of the samples.