14 January 2015
Revised 22 January 2015

Christos Tsiamis
Project Manager
New York Remediation Branch
USEPA, Region 2
290 Broadway, 20th Floor
New York, NY 10007

Re: 363 Bond Street Supplemental Remedial Measures Plan
363 Bond Street
Brooklyn, New York
Langan Project No. 100287501

Dear Mr. Tsiamis:

This Supplemental Remedial Measures Plan has been developed for the Bond Street Redevelopment project, located at 363 Bond Street and 388 Carroll Street (Block 452, Lots 1 and 15) in the Carroll Gardens neighborhood of Brooklyn, New York (the Site). A Site location figure is provided as Figure 1. The following document is provided to address comments by the United States Environmental Protection Agency (USEPA) to the 3 December 2014 363 Bond Street Supplemental Remedial Investigation Analytical Results Package. These comments identified that in addition to the excavation proposed in the November 2014 Draft Remedial Action Work Plan and the NYSDEC approved Interim Remedial Measures Work Plan (IRMWP) Addendum dated 12 November 2014, additional excavation to address impacts that were identified as part of the Supplemental Remedial Investigation is required. These supplemental remedial measures will be completed in addition to the remedial measures that were identified in the Interim Remedial Measures (IRM) Work Plan that was approved by the New York State Department of Environmental Conservation (NYSDEC) on 13 November 2014.

The remedial measures proposed in both the IRMWP and this Supplemental Remedial Measures Plan were developed based on the findings of several environmental investigations completed at the site to date. These investigation activities included completion of 63 soil borings and test pits and collection of 139 discrete soil samples to identify any potential releases and to characterize the site, and installation and sampling of sixteen groundwater monitoring wells to assess site wide groundwater conditions.

The results of these investigations were detailed in the May 2014 Draft Remedial Investigation Report. Laboratory analytical results of all investigations completed at the site are summarized on Figure 2. Based on these results and the visual observations of the soil conditions indicating the presence of non-aqueous phase liquids (NAPL), remedial measures are proposed as

detailed in the following sections. These measures will be completed in addition to the measures identified in the NYSDEC approved IRM Workplan.

SCOPE OF WORK

Boring Location SB-3

As identified and discussed in further detail in the 363 Bond Street Supplemental Remedial Investigation Analytical Results Package this area was expanded to include the boring locations EPA-13 and EPA-14 to address elevated polycyclic aromatic hydrocarbons (PAHs) that were detected in the two borings. The extents of the excavation may be extended in the field to include areas of elevated PID readings and visual impacts. All impacts will be adequately addressed by the measures included in the NYSDEC approved Interim Remedial Measures Work Plan (IRMWP).

Boring Locations EPA-9, -10 and -11

Laboratory analytical results from these borings identified elevated concentrations of PAHs and metals. Additionally, elevated concentrations of naphthalene were also detected in boring location EPA-9. In order to address these impacts a fifteen-foot by fifteen-foot excavation centered on the boring location and advanced two-feet below the groundwater table (approximately 8 to 10 feet below current grades) will be completed to remove these impacts. The extents of these excavations as well as those identified above are shown on the attached Figure 2.

AOC-6

Prior to issuing the Remedial Action Work Plan for the 363 Bond St site to the public comment period, the NYSDEC requested that an area surrounding LSV-20 be excavated to address an anomalously high concentration in soil vapor. This excavation area (AOC-6) has been extended to the west to also remove the shallow impacts of arsenic that were identified in the EPA-12 boring. The excavation area will be approximately 15-foot by 30-foot and will be advanced two-feet below the groundwater table (approximately 8 to 10 feet below current grades).

Post excavation soil sampling for documentation purposes will be completed in accordance with the approved IRMWP Addendum and NYSDEC DER-10 requirements. In addition to the post excavation sampling, the excavation activities will also be photo documented. The results and photographs will be summarized and provided in the Final Engineering Report that will be submitted to the NYSDEC and USEPA and will document the remediation of the site.

All excavated material will be sampled for waste characterization prior to off-site disposal. Thereafter, the excavation will be immediately backfilled and compacted to the required development grade depth with imported backfill which will meet the requirements of 6 NYCRR 375-6.7(d) and 6 NYCRR 376-5.4(e), covered by the engineered composite site cap.

CONCLUSIONS

Based on the results of previous investigations and comments from the USEPA, the above identified excavation areas in addition to the previously identified AOCs, approved by the NYSDEC, will be completed and will adequately remediate soil impacts at the site.

All excavated material will be sampled for waste characterization prior to off-site disposal. Thereafter, the excavation would be backfilled, immediately upon reaching the extents of the excavation area and compacted to the required development grade depth with imported backfill which will meet the requirements of 6 NYCRR 375-6.7(d) and 6 NYCRR 376-5.4(e), covered by the engineering cap. The above remedial measures will commence on the week of 19 May 2014. Upon approval of this work plan, this excavation work plan will be incorporated in the NYSDEC approved IRM Work Plan.

Please call with any questions.

Sincerely,
Langan Engineering, Environmental, Surveying and Landscape Architecture, D.P.C.

Chris McMahon
Project Geologist

Steven A. Ciambruschini, P.G., L.E.P.
Principal / Vice President

CM:SAC:kn
Enclosure(s): Figures 1 and 2

cc: Brian Carr - USEPA
Mark Green, Frank List, Scott Avram, Pam Horn – Lightstone
Satyajit Vaidya, Amanda Forsburg, Christine Madsen – Langan

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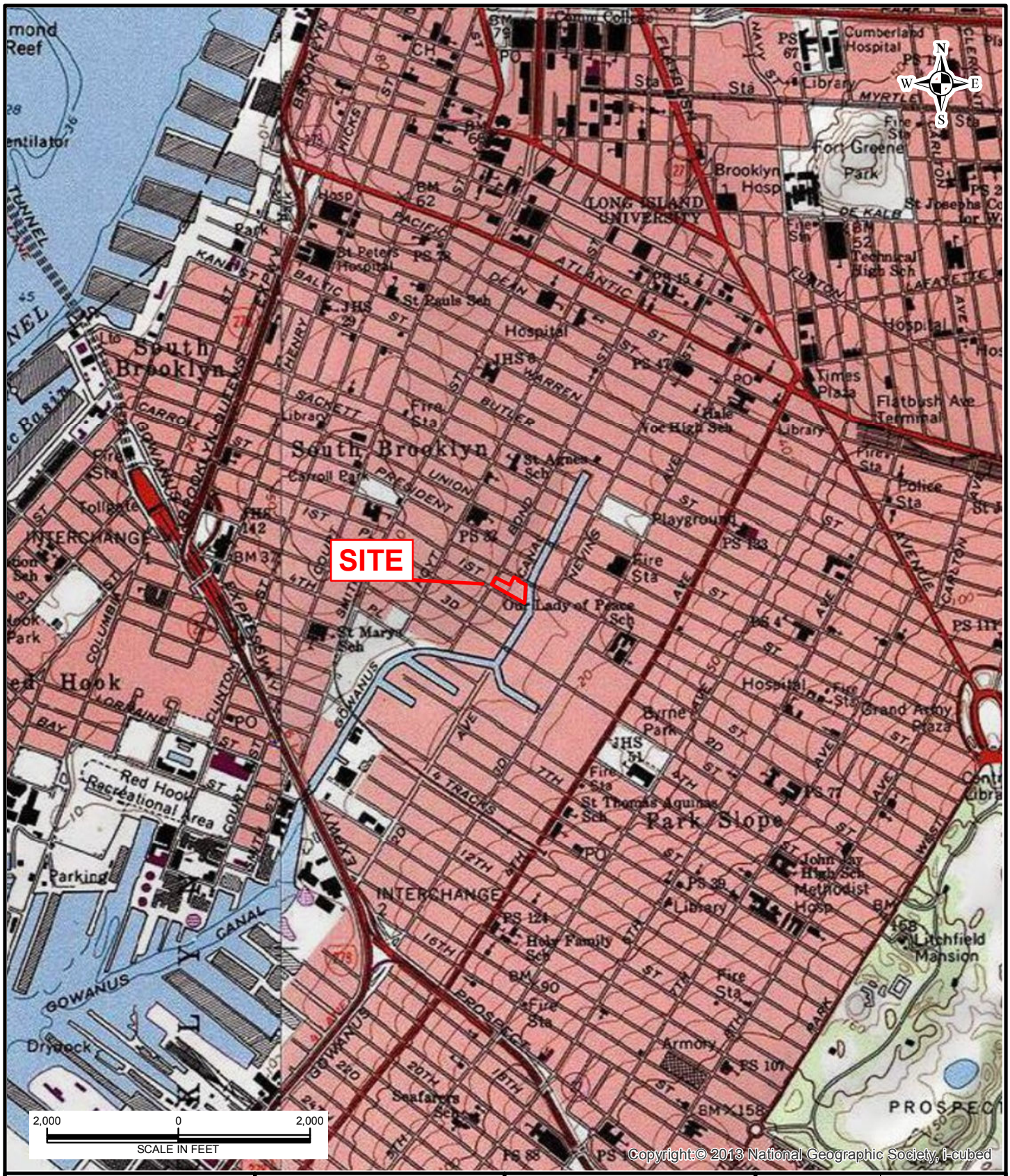
FIGURES



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Langan Engineering & Environmental Services, Inc.
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Collectively known as Langan

NJ CERTIFICATE OF AUTHORIZATION No. 24GA27996400

Project	Drawing Title	Project No.	Figure
PROPOSED BOND STREET DEVELOPMENT BLOCK No. 452, LOT Nos. 1 & 15 BROOKLYN KINGS COUNTY NEW YORK	SITE LOCATION MAP	100287501	1
		Date: 1/6/2015	
		Scale: 1"=2000'	
		Drawn By: amf	
		Last Revised: 1/6/2015	

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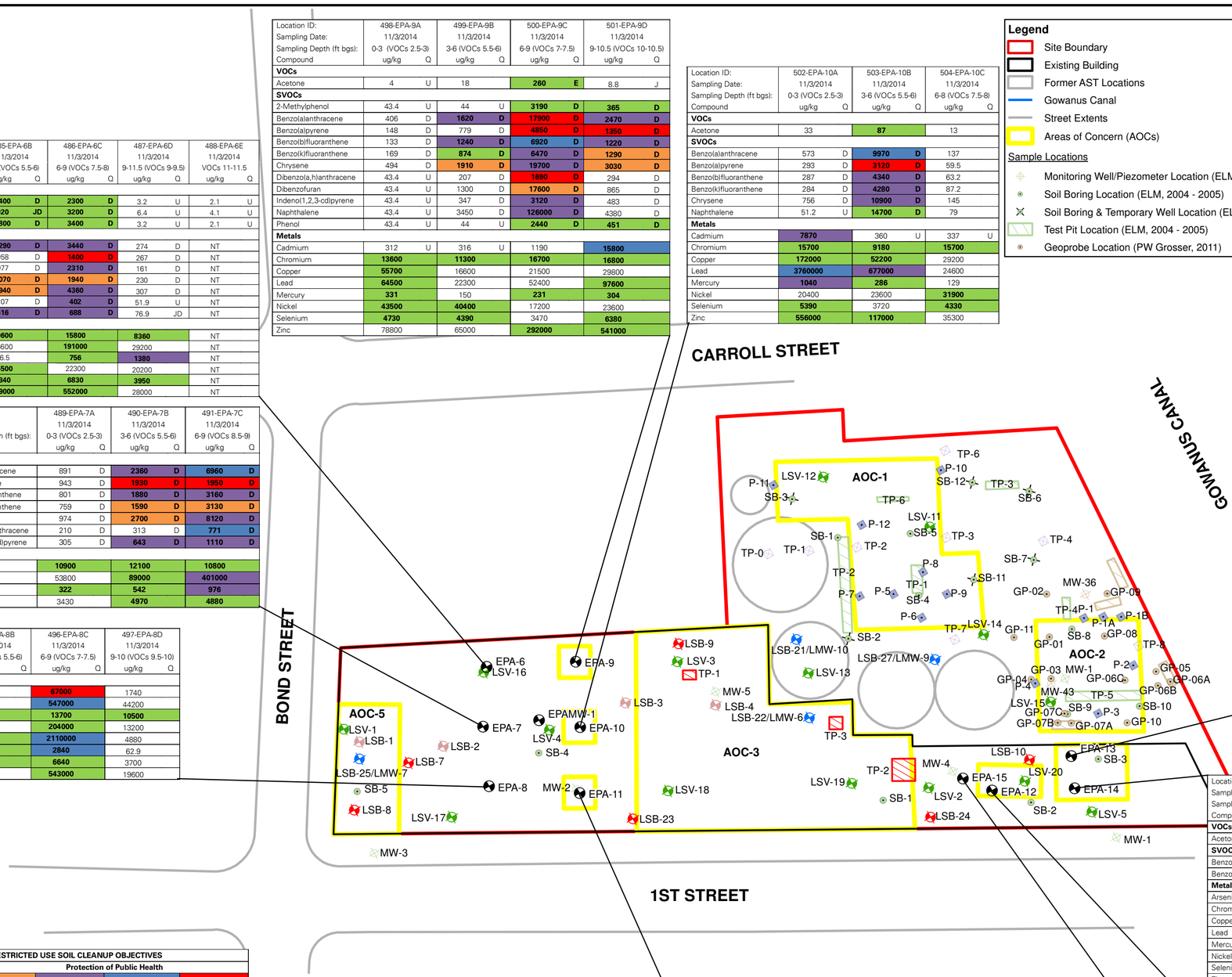
Path: \\langan.com\data\EP\data5\100287501\ArcGIS\ArcMap_Documents\2015-01 DEC Supplemental RWT\Figure 1 - Site Location Plan.mxd



Legend

- Site Boundary
- Existing Building
- Former AST Locations
- Gowanus Canal
- Street Extents
- Areas of Concern (AOCs)

Sample Locations

- Monitoring Well/Piezometer Location (ELM, 2004 - 2005)
- Soil Boring Location (ELM, 2004 - 2005)
- Soil Boring & Temporary Well Location (ELM, 2004 - 2005)
- Test Pit Location (ELM, 2004 - 2005)
- Geoprobe Location (PW Grosser, 2011)
- Monitoring Well Location (USEPA, 2011)
- Test Pit Location (PW Grosser, 2011)
- Test Pit Location (Zeb Environmental, 2012)
- Test Pit Location (Cosmo Environmental, 1997)
- Soil Vapor Point Location (Langan Due Diligence Investigation, 2012)
- Soil Boring Location (Langan Due Diligence, 2012)
- Soil Vapor Point Location (Langan Remedial Investigation, 2013)
- Monitoring Well Location (Langan Remedial Investigation, 2013)
- Soil Boring Location (Langan Remedial Investigation, 2013)
- Soil Boring Location (2014)
- Soil Boring/Monitoring Well Location (2014)
- Test Pit Location (Langan, 2013)

Location ID:	484-EPA-6A		485-EPA-6B		486-EPA-6C		487-EPA-6D		488-EPA-6E	
Sampling Date:	11/3/2014		11/3/2014		11/3/2014		11/3/2014		11/3/2014	
Sampling Depth (ft bgs):	0-3 (VOCs 2.5-3)		3-6 (VOCs 5.5-6)		6-9 (VOCs 7.5-8)		9-11.5 (VOCs 9-9.5)		VOCs 11-11.5	
Compound	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q
VOCs										
cis-1,2-Dichloroethylene	2.2	U	2400	D	2300	D	3.2	U	2.1	U
Methylene chloride	4.3	U	920	JD	3200	D	6.4	U	4.1	U
Trichloroethylene	2.2	U	3800	D	3400	D	3.2	U	2.1	U
SVOCs										
Benzo(a)anthracene	21.6	U	3290	D	3440	D	274	D	NT	
Benzo(a)pyrene	21.6	U	958	D	1400	D	267	D	NT	
Benzo(b)fluoranthene	21.6	U	977	D	2310	D	161	D	NT	
Benzo(k)fluoranthene	21.6	U	1070	D	1940	D	230	D	NT	
Chrysene	27.8	J	2940	D	4360	D	307	D	NT	
Dibenzo(a,h)anthracene	21.6	U	207	D	402	D	51.9	U	NT	
Indeno(1,2,3-cd)pyrene	21.6	U	516	D	688	D	76.9	JD	NT	
Metals										
Chromium	10200		10600		15800		8360		NT	
Lead	11200		36600		191000		29200		NT	
Mercury	30.9	U	96.5		756		1380		NT	
Nickel	36800		35500		22300		20200		NT	
Selenium	4420		4340		6830		3950		NT	
Zinc	29600		129000		552000		28000		NT	

Location ID:	489-EPA-7A		490-EPA-7B		491-EPA-7C	
Sampling Date:	11/3/2014		11/3/2014		11/3/2014	
Sampling Depth (ft bgs):	0-3 (VOCs 2.5-3)		3-6 (VOCs 5.5-6)		6-9 (VOCs 8.5-9)	
Compound	ug/kg	Q	ug/kg	Q	ug/kg	Q
SVOCs						
Benzo(a)anthracene	891	D	2360	D	6960	D
Benzo(a)pyrene	943	D	1930	D	1950	D
Benzo(b)fluoranthene	801	D	1880	D	3160	D
Benzo(k)fluoranthene	759	D	1590	D	3130	D
Chrysene	974	D	2700	D	8120	D
Dibenzo(a,h)anthracene	210	D	313	D	771	D
Indeno(1,2,3-cd)pyrene	305	D	643	D	1110	D
Metals						
Chromium	10900		12100		10800	
Lead	53800		89000		401000	
Mercury	322		542		976	
Selenium	3430		4970		4880	

Location ID:	494-EPA-8A		495-EPA-8B		496-EPA-8C		497-EPA-8D	
Sampling Date:	11/3/2014		11/3/2014		11/3/2014		11/3/2014	
Sampling Depth (ft bgs):	0-3 (VOCs 2.5-3)		3-6 (VOCs 5.5-6)		6-9 (VOCs 7-7.5)		9-10 (VOCs 9.5-10)	
Compound	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q
Metals								
Arsenic	3490		4710		67000		1740	
Barium	58200		64300		547000		44200	
Chromium	15400		15600		13700		10500	
Copper	24200		29800		204000		13200	
Lead	52500		163000		2110000		4880	
Mercury	154		280		2840		62.9	
Selenium	4120		4180		6640		3700	
Zinc	53100		62700		543000		19600	

Location ID:	498-EPA-9A		499-EPA-9B		500-EPA-9C		501-EPA-9D	
Sampling Date:	11/3/2014		11/3/2014		11/3/2014		11/3/2014	
Sampling Depth (ft bgs):	0-3 (VOCs 2.5-3)		3-6 (VOCs 5.5-6)		6-9 (VOCs 7-7.5)		9-10.5 (VOCs 10-10.5)	
Compound	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q
VOCs								
Acetone	4	U	18		260	E	8.8	J
SVOCs								
2-Methylphenol	43.4	U	44	U	3190	D	365	D
Benzo(a)anthracene	406	D	1620	D	17900	D	2470	D
Benzo(a)pyrene	148	D	779	D	4850	D	1350	D
Benzo(b)fluoranthene	133	D	1240	D	6920	D	1220	D
Benzo(k)fluoranthene	169	D	874	D	6470	D	1290	D
Chrysene	494	D	1910	D	19700	D	3030	D
Dibenzo(a,h)anthracene	43.4	U	207	D	1690	D	294	D
Dibenzofuran	43.4	U	1300	D	17600	D	865	D
Indeno(1,2,3-cd)pyrene	43.4	U	347	D	3120	D	483	D
Naphthalene	43.4	U	3450	D	126000	D	4380	D
Phenol	43.4	U	44	U	2440	D	451	D
Metals								
Cadmium	312	U	316	U	1190		15800	
Chromium	13600		11300		16700		16800	
Copper	55700		16600		21500		29800	
Lead	64500		22300		52400		97600	
Mercury	331		150		231		304	
Nickel	43500		40400		17200		23600	
Selenium	4730		4390		3470		6380	
Zinc	78800		65000		292000		541000	

Location ID:	502-EPA-10A		503-EPA-10B		504-EPA-10C	
Sampling Date:	11/3/2014		11/3/2014		11/3/2014	
Sampling Depth (ft bgs):	0-3 (VOCs 2.5-3)		3-6 (VOCs 5.5-6)		6-8 (VOCs 7.5-8)	
Compound	ug/kg	Q	ug/kg	Q	ug/kg	Q
VOCs						
Acetone	33		87		13	
SVOCs						
Benzo(a)anthracene	573	D	9970	D	137	
Benzo(a)pyrene	293	D	3120	D	59.5	
Benzo(b)fluoranthene	287	D	4340	D	63.2	
Benzo(k)fluoranthene	284	D	4280	D	87.2	
Chrysene	756	D	10900	D	145	
Naphthalene	51.2	U	14700	D	79	
Metals						
Cadmium	7870		360	U	337	U
Chromium	15700		9180		15700	
Copper	172000		52200		29200	
Lead	3760000		677000		24600	
Mercury	1040		286		129	
Nickel	20400		23600		31900	
Selenium	5390		3720		4330	
Zinc	556000		117000		35300	

Location ID:	515-EPA-13A		516-EPA-13B		517-EPA-13C		518-EPA-13D	
Sampling Date:	11/3/2014		11/3/2014		11/3/2014		11/3/2014	
Sampling Depth (ft bgs):	0-3 (VOCs 2.5-3)		3-6 (VOCs 5.5-6)		6-9 (VOCs 7.5-8)		VOCs 9-9.5	
Compound	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q
VOCs								
Acetone	7.3	U	150		31000	U	6.1	U
n-Butylbenzene	3.6	U	3.5	U	26000	JD	3.1	U
n-Propylbenzene	3.6	U	3.5	U	46000	D	14	
sec-Butylbenzene	3.6	U	3.5	U	20000	JD	8.2	
SVOCs								
Benzo(a)anthracene	358	D	705	D	33700	D	NT	
Benzo(a)pyrene	283	D	602	D	23100	D	NT	
Benzo(b)fluoranthene	276	D	475	D	16100	D	NT	
Benzo(k)fluoranthene	286	D	536	D	20000	D	NT	
Chrysene	420	D	826	D	39900	D	NT	
Dibenzo(a,h)anthracene	44.8	U	50.5	U	2630	D	NT	
Indeno(1,2,3-cd)pyrene	106	D	184	D	6030	D	NT	
Metals								
Chromium	15900		11000		8690		NT	
Copper	179000		134000		31100		NT	
Lead	236000		154000		161000		NT	
Mercury	366		779		717		NT	
Nickel	42000		23200		24200		NT	
Selenium	6110		4310		5130		NT	
Zinc	1270000		55500		94100		NT	

Location ID:	510-EPA-14A		511-EPA-14B		512-EPA-14C		513-EPA-14D		514-EPA-14E	
Sampling Date:	11/3/2014		11/3/2014		11/3/2014		11/3/2014		11/3/2014	
Sampling Depth (ft bgs):	0-3 (VOCs 2.5-3)		3-6 (VOCs 5.5-6)		6-9 (VOCs 6.5-7)		9-12 (VOCs 9.5-10)		VOCs 12-12.5	
Compound	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q
VOCs										
Acetone	6.4	J	8.2	U	860	U	7.1	U	97	
SVOCs										
Benzo(a)pyrene	342	D	460	D	417	D	1240	D	NT	
Benzo(k)fluoranthene	364	D	435	D	415	D	1040	D	NT	
Metals										
Arsenic	39000		12500		8120		11000		NT	
Chromium	14500		10200		11600		13400		NT	
Copper	292000		76700		61500		53000		NT	
Lead	366000		510000		3290000		214000		NT	
Mercury	976		584		1030		717		NT	
Nickel	33200		20600		19100		25600		NT	
Selenium	11900		4120		4610		5150		NT	
Zinc	176000		154000		155000		71500		NT	

SUBPART 375-6 (Revised Brownfields)	RESTRICTED USE SOIL CLEANUP OBJECTIVES				
		Protection of Public Health			
	Unrestricted Use Objectives	Residential	Restricted - Residential	Restricted - Commercial	Restricted - Industrial
	ug/kg	ug/kg	ug/kg	ug/kg	ug/kg
VOCs					
Acetone	50	100000	100000	500000	1000000
Benzene	60	2900	4800	44000	89000
cis-1,2-Dichloroethylene	250	59000	100000	500000	1000000
Methylene chloride	50	51000	100000	500000	1000000
n-Butylbenzene	12000	100000	100000	500000	1000000
n-Propylbenzene	3900	100000	100000	500000	1000000
p- & m- Xylenes	260	100000	100000	500000	1000000
sec-Butylbenzene	11000	100000	100000	500000	1000000
Toluene	700	100000	100000	500000	1000000
Trichloroethylene	470	10000	21000	200000	400000
Xylenes, Total	260	100000	100000	500000	1000000
SVOCs					
2-Methylphenol	330	100000	100000	500000	1000000
Benzo(a)anthracene	1000	1000	1000	5600	11000
Benzo(a)pyrene	1000	1000	1000	1000	1100
Benzo(b)fluoranthene	1000	1000	1000	5600	11000
Benzo(k)fluoranthene	800	1000	3900	56000	110000
Chrysene	1000	1000	3900	56000	110000
Dibenzo(a,h)anthracene	330	330	330	560	1100
Dibenzofuran	7000	14000	59000	350000	1000000
Indeno(1,2,3-cd)pyrene	500	500	500	5600	11000
Naphthalene	12000	100000	100000	500000	1000000
Phenol	330	100000	100000	500000	1000000
Metals					
Arsenic	13000	16000	16000	16000	16000
Barium	350000	350000	400000	400000	10000000
Cadmium	2500	2500	4300	9300	60000
Chromium	1000	22000	110000	400000	800000
Copper	50000	270000	270000	270000	10000000
Lead	63000	400000	400000	1000000	3900000
Mercury	180	810	810	2800	5700
Nickel	30000	140000	310000	310000	10000000
Selenium	3900	36000	180000	1500000	6800000
Zinc	109000	2200000	10000000	10000000	10000000

Location ID:	505-EPA-11A		506-EPA-11B		507-EPA-11C		508-EPA-11D	
Sampling Date:	11/3/2014		11/3/2014		11/3/2014		11/3/2014	
Sampling Depth (ft bgs):	0-3 (VOCs 2.5-3)		3-6 (VOCs 5.5-6)		6-9 (VOCs 8.5-9)		9-12 (VOCs 11.5-12)	
Compound	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q
SVOCs								
Benzo(a)anthracene	326	D	23.5	U	12700	D	5950	D
Benzo(a)pyrene	359	D	23.5	U	5710	D	3460	D
Benzo(b)fluoranthene	337	D	23.5	U	7540	D	3030	D
Benzo(k)fluoranthene	321	D	23.5	U	7540	D	2800	D
Chrysene	435	D	23.5	U	16000	D	7590	D
Dibenzo(a,h)anthracene	75.9	JD	23.5	U	1260	D	479	D
Indeno(1,2,3-cd)pyrene	141	D	23.5	U	2880	D	1180	D
Metals								
Chromium	30600		11900		7160		17300	
Copper	26600		12100		79700		26700	
Lead	1480000		10000		312000	B	263000	B
Mercury	1330		45.9		492		1160	
Nickel	34600		23500		15900		34000	
Selenium	4730		4320		6460		4470	
Zinc	69200		29300		226000		62300	

Location ID:	519-EPA-15A		520-EPA-15B		521-EPA-15C		522-DUP-1 (EPA-15C)		523-EPA-15D	
Sampling Date:	11/3/2014		11/3/2014		11/3/2014		11/3/2014		11/3/2014	
Sampling Depth (ft bgs):	0-3 (VOCs 2.5-3)		3-6 (VOCs 5.5-6)		6-9 (VOCs 7-7.5)		6-9 (VOCs 7-7.5)		VOCs 9.5-10	
Compound	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q
VOCs										
Benzene	2.7	U	1100	D	300	U	360	U	2.2	U
p- & m- Xylenes	5.5	U	1200	D	590	U	720	U	4.5	U
Toluene	2.7	U	1200	D	300	U	360	U	2.2	U
Xylenes, Total	8.2	U	1300	JD	890	U	1100	U	6.7	U
SVOCs										
Benzo(a)anthracene	1500	D	208		59.3		28.8	U	NT	
Benzo(k)fluoranthene	1270	D	178		63.2		28.8	U	NT	
Chrysene	1950	D	245		81.4		28.8	U	NT	
Metals										
Arsenic	3740		13100		7070		6870		NT	
Chromium	14000		11600		11400		11700		NT	
Copper	71400		106000		72400		90200		NT	
Lead	142000		274000		330000		384000		NT	
Mercury	273		951		586		1320		NT	
Selenium	4450		6050		5390		3960		NT	
Zinc	78100		128000		129000		208000		NT	

Location ID:	524-EPA-12A		525-EPA-12B		526-EPA-12C		527-EPA-12D	
Sampling Date:	11/4/2014		11/4/2014		11/4/2014		11/4/2014	
Sampling Depth (ft bgs):	0-3 (VOCs 2.5-3)		3-6 (VOCs 5.5-6)		6-9 (VOCs 7.5-8)		VOCs 8.5-9	
Compound	ug/kg	Q	ug/kg	Q	ug/kg	Q	ug/kg	Q
VOCs								
Acetone	5.3	U	11	J	1500	U	87	
SVOCs								
Benzo(a)anthracene	2720	D	99.6	JD	344	D	NT	
Benzo(a)pyrene	2390	D	95.2	JD	254	D	NT	
Benzo(b)fluoranthene	2000	D	54.3	U	198	D	NT	
Benzo(k)fluoranthene	1990	D	77.9	JD	249	D	NT	
Chrysene	3560	D	126	D	382	D	NT	
Indeno(1,2,3-cd)pyrene	780	D	54.3	U	50.9	U	NT	
Metals								
Arsenic	7910		41500		5540		NT	
Chromium	10700		21300		10100		NT	
Copper	60600		147000		48200		NT	
Lead	459000		247000		91600		NT	
Mercury	1110		519		237		NT	
Nickel	18100		38700		19700		NT	
Selenium	4230		7870		3040		NT	
Zinc	129000		377000		99900		NT	

0 40 80

SCALE IN FEET

Notes:
1. Map features are based on aerial photographs, tax maps, and the following ELM reports: Phase II Investigation Report, 363 Bond Street (May 2005); and Phase II Investigation Report, 400 Carroll Street (May 2005).
2. All ELM sample locations are approximate and based on the reports identified in Note 1.
3. AOC-1: Proposed Excavation Area - 388 Carroll Street, North; AOC-2: Proposed Excavation Area - 388 Carroll Street, South; AOC-3: Proposed Excavation Area - 363 Bond Street; AOC-5: Former UST Area

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Project
PROPOSED BOND STREET DEVELOPMENT
BLOCK No. 452, LOT No. 1 & 15
BROOKLYN
KINGS COUNTY NEW YORK

Drawing Title
SOIL ANALYTICAL RESULTS

Project No.	100287503
Date	11/17/2014
Scale	1"=40'
Drawn By	ATR
Last Revised	1/22/2015
Figure	2

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Path: \\Langan.com\data\EP\data5\100287501\ArcGIS\ArcMap_Documents\2014-11 - USEPA Supplemental RI (363)\Figure 2 - Soil Analytical Results (Revised 2015-01-22).mxd