Stantec

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VIA Next Day Delivery

August 1, 2016

John Armstead
United States Environmental Protection Agency Region 3
1650 Arch Street
Mail Code 3LC00
Philadelphia, PA 19103

Re: Addendum to June 28, 2016 Notification and Certification of Self-Implementing Cleanup and Disposal of PCB Remediation Waste
Wreck Track Improvement Project
Operable Unit 2 (OU-2)
Amtrak Wilmington Maintenance Facility (DE-0170)
4001 Vandever Ave., Wilmington, DE

Dear Mr. Armstead:

On behalf of National Railroad Passenger Corporation (Amtrak), Stantec has prepared this Addendum to the June 28, 2016 Notification and Certification of Self-Implementing Cleanup & Disposal of PCB Remediation Waste (to be referred to as the "Application") for the Wreck Track Improvement Project at the Amtrak Wilmington Maintenance Facility located along Vandever Avenue in Wilmington, Delaware. This addendum has been prepared for United States Environmental Protection Agency (EPA) review and approval in order to address EPA's comments to the June 28, 2016 submittal provided in their e-mail dated July 22, 2016. Set forth below is the EPA comment followed by the response to each comment.

<u>Comment #1</u>

As discussed in a May 2, 2016 email to Stantec, the use of extraction method 3540C (soxhlet) or 3550B (sonication) must be used, see 40 CFR Section 761.272. These are the only two extraction methods acceptable under the PCB regulation unless you submit a comparison study under the provisions of Subpart Q of the PCB regulation. The Wreck Track submittal includes sample results taken 3-14-16 which were extracted using method 3546 but does not include the 5-11-16 samples referenced in the text. I was copied on a July 1, 2016 draft plan sent to John Cargill which included the 5-11-16 samples which were

extracted using one of the accepted extraction methods, 3550B. I am guessing you mistakenly omitted the 5-11-16 lab results from the submittal to EPA. Please officially submit the results as an amendment.

Response

As noted in comment 1, sampling in the Wreck Track Improvement Project footprint was conducted in March 2016. EPA provided comments to the Building 15.1 Equipment Enclosure Application on April 20, 2016. All sampling previous to this correspondence was conducted in accordance with the DNREC Voluntary Cleanup Program (VCP) requiring extraction by Method 3546. DNREC provided clarification to the extraction method requirements with respect to the VCP on May 11, 2016 which acknowledges TSCA regulations as well as allowing extraction methods 3540C (soxhlet) or 3550B (sonication) for the ongoing VCP program at the site. It is acknowledged that the acceptable extraction methods per TSCA regulations are 3540C (soxhlet) or 3550B (sonication). Future samples for the Wreck Track Improvement Project will be extracted by one of these approved methods.

The results of sampling conducted on May 11, 2016 and reported to DNREC as part of the VCP are provided on the attached **Tables 1** through **Table 5**. PCB analytical results are reported on **Table 4**. The laboratory analytical data provided in **Tables 1** through **Table 5** are from samples collected below the planned depth of excavation for the Wreck Track Improvement Project to the top of the water table. Total PCB concentrations ranged from 0.023 mg/kg (W-4(2.8-3.0) and W-4(3.8-4.0)) to 7.6 mg/kg (W-1(4.3-4.5)). The DNREC RI Report (July 1, 2016) was submitted after submittal of the June 28, 2016 Application.

Comment #2

The cleanup level proposed is 50 ppm which requires fencing in the area of concern and posting a ML label. The fencing you propose appears to be for the entire site not the area of concern, this does meet the intent of the requirement. I don't imagine you can fence in the area of concern since it is a rail track so I suggest proposing to meet the 25 ppm cleanup level under the low occupancy provisions this does not require fencing or posting of the ML mark but still requires the deed restriction.

Response

The revised Section 3.2 is provided below.

3.2 Clean-up Level

The low occupancy cleanup level is selected because the footprint is occupied only by railroad equipment with occasional occupancy to remove/replace secondary shunting devices (the occasional occupancy is less than the 6.7 hrs./week as defined in 40 CFR 761.3 for low occupancy. In the event that PCBs are identified in post-excavation samples greater than 25 mg/kg and less than or equal to 50 mg/kg in the footprint of the Wreck Track Improvement Project, Amtrak requests an alternate cleanup level under the provisions of 761.61(a) and 761.61(c), the conditions are:

1) Fencing around the entire property will be utilized to restrict access and will be marked with a PCB M_L mark [761.61(a)(4)(i)(B)(2) and posted at all visible entrances, and

2) Deed restrictions will be implemented [761.61(a)(8)] indicating the location and concentration of PCBs in soils remaining in the footprint of the Wreck Track Project.

In the event that PCBs are identified in post-excavation samples less than or equal to 25 mg/kg, the soils will be left in place without restrictions (761.61(a)(4)(i)(B)(1)) and deed restrictions would be implemented.

Verification sampling will be conducted in accordance with Section 3.3 of the June 28, 2016 Application.

As described previously, because the footprint of the planned Wreck Track Improvement Project is surrounded by areas being considered within the Maintenance Facility (DE-0170) under the Delaware VCP program, the remedy and clean-up criteria for the Maintenance Facility project will apply for areas outside of the footprint. This evaluation is being conducted in accordance with agency (DNREC and EPA) oversight.

If you have any questions regarding the attached document, please feel free to contact me at (610) 840-2538 or Frank Aceto at (610) 840-2566.

Sincerely,

STANTEC CONSULTING SERVICES INC.

Steve Baggett, PG
Principal Hydrogeologist

Enclosure
c. J. Cargill – DNREC, C. Caldwell, A. Enzman, M. Stern – Amtrak, F. Aceto, P. Miller – Stantec, Project File

Table 1
Subsurface Soil - Wreck Track
VOC Analytical Results
May 2016

Amtrak Wilmington Maintenance Facility
4001 Vandever Avenue
Wilmington, Delaware

Analysis Name	Units	DNREC-SIRS Screening Level Soil[1]	8382799 W-1(4.5-5.0) Dry Result	8382802 W-2(2.0-2.5) Dry Result	8382804 W-3(2.0-2.5) Dry Result	8382812 W-4(5.0-5.5) Dry Result
Volatile Organic Compounds						
Acetone	mg/kg	6100	< 0.023	**0.037**	< 0.032	< 0.021
Benzene	mg/kg	1.2	< 0.006	< 0.004	< 0.008	< 0.005
Bromodichloromethane	mg/kg	0.29	< 0.006	< 0.004	< 0.008	< 0.005
Bromoform	mg/kg	19	< 0.006	< 0.004	< 0.008	< 0.005
Bromomethane	mg/kg	0.68	< 0.006	< 0.004	< 0.008	< 0.005
2-Butanone	mg/kg	2700	< 0.012	< 0.009	< 0.016	< 0.010
Carbon Disulfide	mg/kg	77	< 0.006	< 0.004	< 0.008	< 0.005
Carbon Tetrachloride	mg/kg	0.65	< 0.006	< 0.004	< 0.008	< 0.005
Chlorobenzene	mg/kg	28	< 0.006	< 0.004	< 0.008	< 0.005
Chloroethane	mg/kg	1400	< 0.006	< 0.004	< 0.008	< 0.005
Chloroform	mg/kg	0.32	< 0.006	< 0.004	< 0.008	< 0.005
Chloromethane	mg/kg	11	< 0.006	< 0.004	< 0.008	< 0.005
Dibromochloromethane	mg/kg	8.3	< 0.006	< 0.004	< 0.008	< 0.005
1,1-Dichloroethane	mg/kg	3.6	< 0.006	< 0.004	< 0.008	< 0.005
1,2-Dichloroethane	mg/kg	0.46	< 0.006	< 0.004	< 0.008	< 0.005
1,1-Dichloroethene	mg/kg	23	< 0.006	< 0.004	< 0.008	< 0.005
cis-1,2-Dichloroethene	mg/kg	16	< 0.006	< 0.004	< 0.008	< 0.005
trans-1,2-Dichloroethene	mg/kg	160	< 0.006	< 0.004	< 0.008	< 0.005
1,2-Dichloropropane	mg/kg	1	< 0.006	< 0.004	< 0.008	< 0.005
cis-1,3-Dichloropropene	mg/kg	32	< 0.006	< 0.004	< 0.008	< 0.005
trans-1,3-Dichloropropene	mg/kg	5,000	< 0.006	< 0.004	< 0.008	< 0.005
Ethylbenzene	mg/kg	5.8	< 0.006	< 0.004	< 0.008	< 0.005
2-Hexanone	mg/kg	20	< 0.012	< 0.009	< 0.016	< 0.010
4-Methyl-2-pentanone	mg/kg	3300	< 0.012	< 0.009	< 0.016	< 0.010
Methylene Chloride	mg/kg	35	< 0.006	< 0.004	< 0.008	< 0.005
Styrene	mg/kg	600	< 0.006	< 0.004	< 0.008	< 0.005
1,1,2,2-Tetrachloroethane	mg/kg	0.6	< 0.006	< 0.004	< 0.008	< 0.005
Tetrachloroethene	mg/kg	8.1	< 0.006	< 0.004	< 0.008	< 0.005
Toluene	mg/kg	490	< 0.006	< 0.004	< 0.008	< 0.005
1,1,1-Trichloroethane	mg/kg	810	< 0.006	< 0.004	< 0.008	< 0.005
1,1,2-Trichloroethane	mg/kg	0.15	< 0.006	< 0.004	< 0.008	< 0.005
Trichloroethene	mg/kg	0.41	< 0.006	< 0.004	< 0.008	< 0.005
Vinyl Chloride	mg/kg	0.059	< 0.006	< 0.004	< 0.008	< 0.005
Xylene (Total)	mg/kg	58	< 0.006	< 0.004	< 0.008	< 0.005

[1] - DNREC SIRS Screening Levels for Soil Updated February 2016
Bold - indicates constituent was detected above the Method Detection Limit (MDL)
Bold and Shaded - Indicates constituent was detected above the DNREC-SIRS Screening Level for Soil (updated Feb 2016)
mg/kg - milligrams per kilogram
< 0.15 - Indicates the constituent was not detected at the method detection limit
NS - No standard for the given constituent

Table 2
Subsurface Soil - Wreck Track
SVOC Analytical Results
May 2016

Amtrak Wilmington Maintenance Facility
4001 Vandever Avenue
Wilmington, Delaware

Analysis Name	Units	DNREC-SIRS Screening Levels Soil[1]	8382800 W-1(4.0-5.0) Dry Result	8382802 W-2(2.0-2.5) Dry Result	8382804 W-3(2.0-2.5) Dry Result	8382816 W-4(4.0-5.5) Dry Result
Semi-Volatile Organic Compounds						
Acenaphthene	mg/kg	360	< 0.020	< 0.019	< 0.025	< 0.021
Acenaphthylene	mg/kg	NS	**0.081**	< 0.019	< 0.025	< 0.021
Anthracene	mg/kg	1800	**0.190**	**0.030**	< 0.025	< 0.021
Benzo(a)anthracene	mg/kg	0.82	**0.130**	**0.130**	**0.036**	< 0.021
Benzo(a)pyrene	mg/kg	0.24	**0.180**	**0.055**	**0.026**	< 0.021
Benzo(b)fluoranthene	mg/kg	1.11	**0.430**	**0.170**	**0.048**	**0.026**
Benzo(g,h,i)perylene	mg/kg	NS	**0.260**	**0.045**	< 0.025	< 0.021
Benzo(k)fluoranthene	mg/kg	1.6	**0.140**	**0.061**	< 0.025	< 0.021
4-Bromophenyl-phenylether	mg/kg	NS	< 0.040	< 0.037	< 0.049	< 0.042
Butylbenzylphthalate	mg/kg	290	< 0.200	< 0.190	< 0.250	< 0.210
Di-n-butylphthalate	mg/kg	630	< 0.200	< 0.190	< 0.250	< 0.210
Carbazole	mg/kg	290	**0.057**	< 0.037	< 0.049	< 0.042
4-Chloro-3-methylphenol	mg/kg	630	< 0.040	< 0.037	< 0.049	< 0.042
4-Chloroaniline	mg/kg	2.7	< 0.079	< 0.075	< 0.099	< 0.084
bis(2-Chloroethoxy)methane	mg/kg	19	< 0.040	< 0.037	< 0.049	< 0.042
bis(2-Chloroethyl)ether	mg/kg	0.23	< 0.040	< 0.037	< 0.049	< 0.042
2-Chloronaphthalene	mg/kg	480	< 0.039	< 0.037	< 0.049	< 0.042
2-Chlorophenol	mg/kg	39	< 0.040	< 0.037	< 0.049	< 0.042
4-Chlorophenyl-phenylether	mg/kg	NS	< 0.040	< 0.037	< 0.049	< 0.042
2,2'-oxybis(1-Chloropropane)	mg/kg	310	< 0.040	< 0.037	< 0.049	< 0.042
Chrysene	mg/kg	16	**0.210**	**0.280**	**0.068**	< 0.021
Dibenz(a,h)anthracene	mg/kg	0.17	**0.065**	< 0.019	< 0.025	< 0.021
Dibenzofuran	mg/kg	7.3	**0.063**	< 0.037	< 0.049	< 0.042
1,2-Dichlorobenzene	mg/kg	180	< 0.040	< 0.037	< 0.049	< 0.042
1,3-Dichlorobenzene	mg/kg	5,000	< 0.040	< 0.037	< 0.049	< 0.042
1,4-Dichlorobenzene	mg/kg	2.6	< 0.040	< 0.037	< 0.049	< 0.042
3,3'-Dichlorobenzidine	mg/kg	1.2	< 0.400	< 0.370	< 0.490	< 0.420
2,4-Dichlorophenol	mg/kg	19	< 0.040	< 0.037	< 0.049	< 0.042
Diethylphthalate	mg/kg	5100	< 0.200	< 0.190	< 0.250	< 0.210
2,4-Dimethylphenol	mg/kg	130	< 0.040	< 0.037	< 0.049	< 0.042
Dimethylphthalate	mg/kg	5,000	< 0.200	< 0.190	< 0.250	< 0.210
4,6-Dinitro-2-methylphenol	mg/kg	0.51	< 0.590	< 0.560	< 0.740	< 0.630
2,4-Dinitrophenol	mg/kg	13	< 1.200	< 1.100	< 1.500	< 1.300
2,4-Dinitrotoluene	mg/kg	1.7	< 0.200	< 0.190	< 0.250	< 0.210
2,6-Dinitrotoluene	mg/kg	0.36	< 0.040	< 0.037	< 0.049	< 0.042
bis(2-Ethylhexyl)phthalate	mg/kg	39	< 0.200	< 0.190	< 0.250	< 0.210
Fluoranthene	mg/kg	240	**0.170**	**0.340**	**0.032**	< 0.021
Fluorene	mg/kg	240	< 0.020	< 0.019	< 0.025	< 0.021
Hexachlorobenzene	mg/kg	0.21	< 0.020	< 0.019	< 0.025	< 0.021
Hexachlorobutadiene	mg/kg	1.2	< 0.040	< 0.037	< 0.049	< 0.042
Hexachlorocyclopentadiene	mg/kg	0.18	< 0.590	< 0.560	< 0.740	< 0.630
Hexachloroethane	mg/kg	1.8	< 0.200	< 0.190	< 0.250	< 0.210
Indeno(1,2,3-cd)pyrene	mg/kg	1.3	**0.240**	**0.040**	< 0.025	< 0.021
Isophorone	mg/kg	570	< 0.040	< 0.037	< 0.049	< 0.042
2-Methylnaphthalene	mg/kg	24	**0.140**	**0.023**	**0.086**	< 0.021
2-Methylphenol	mg/kg	320	< 0.040	< 0.037	< 0.049	< 0.042
4-Methylphenol	mg/kg	630	< 0.040	< 0.037	< 0.049	< 0.042
Naphthalene	mg/kg	3.8	**0.098**	**0.021**	**0.042**	< 0.021
2-Nitroaniline	mg/kg	63	< 0.040	< 0.037	< 0.049	< 0.042
3-Nitroaniline	mg/kg	NS	< 0.200	< 0.190	< 0.250	< 0.210
4-Nitroaniline	mg/kg	25	< 0.200	< 0.190	< 0.250	< 0.210
Nitrobenzene	mg/kg	5.1	< 0.040	< 0.037	< 0.049	< 0.042
2-Nitrophenol	mg/kg	NS	< 0.040	< 0.037	< 0.049	< 0.042
4-Nitrophenol	mg/kg	1,600	< 0.590	< 0.560	< 0.740	< 0.630
N-Nitroso-di-n-propylamine	mg/kg	0.078	< 0.040	< 0.037	< 0.049	< 0.042
N-Nitrosodiphenylamine	mg/kg	110	< 0.040	< 0.037	< 0.049	< 0.042
Di-n-octylphthalate	mg/kg	63	< 0.200	< 0.190	< 0.250	< 0.210
Pentachlorophenol	mg/kg	1	< 0.200	< 0.190	< 0.250	< 0.210
Phenanthrene	mg/kg	180	**0.150**	**0.044**	**0.140**	< 0.021
Phenol	mg/kg	1900	< 0.040	< 0.037	< 0.049	< 0.042
Pyrene	mg/kg	180	**0.160**	**0.430**	**0.041**	< 0.021
1,2,4-Trichlorobenzene	mg/kg	5.8	< 0.040	< 0.037	< 0.049	< 0.042
2,4,5-Trichlorophenol	mg/kg	630	< 0.040	< 0.037	< 0.049	< 0.042
2,4,6-Trichlorophenol	mg/kg	6.3	< 0.040	< 0.037	< 0.049	< 0.042

[1] - DNREC SIRS Screening Levels for Soil Updated February 2016
Bold - indicates constituent was detected above the Method Detection Limit (MDL)
Bold and Shaded - Indicates constituent was detected above the DNREC-SIRS Screening Level for Soil (updated Feb 2016
ug/kg - micrograms per kilogram
< 0.036 - Indicates the constituent was not detected at the method detection limit
NS - No standard for the given constituent

Table 3
Subsurface Soil - Wreck Track
Metal Analytical Results
May 2016

Amtrak Wilmington Maintenance Facility
4001 Vandever Avenue
Wilmington, Delaware

Analysis Name	Units	DNREC-SIRS Screening Levels Soil[1]	8382800 W-1(4.0-5.0) Dry Result	8382802 W-2(2.0-2.5) Dry Result	8382804 W-3(2.0-2.5) Dry Result	8382816 W-4(4.0-5.5) Dry Result
Metals						
Aluminum	mg/kg	51200	**15,800**	**20,500**	**7,940**	**17,500**
Antimony	mg/kg	3.1	< 3.67	< 3.19	< 4.59	< 4.03
Arsenic	mg/kg	11^	< 3.67	< 3.19	**7.23**	< 4.03
Barium	mg/kg	1500	**75.3**	**79.2**	**59.4**	**90.0**
Beryllium	mg/kg	16	< 0.918	< 0.798	< 1.15	< 1.01
Cadmium	mg/kg	7.1	< 0.918	< 0.798	< 1.15	< 1.01
Calcium	mg/kg	NS	**132**	**431**	**1,860**	**487**
Chromium	mg/kg	214	**28.7**	**13.3**	**11.4**	**29.6**
Cobalt	mg/kg	34	**24.0**	**4.08**	**6.92**	**4.89**
Copper	mg/kg	310	**14.6**	**14.0**	**42.3**	**11.7**
Iron	mg/kg	74767	**31,000**	**13,800**	**18,900**	**11,200**
Lead	mg/kg	400	**7.43**	**27.1**	**47.9**	**8.93**
Magnesium	mg/kg	NS	**861**	**882**	**440**	**2,310**
Manganese	mg/kg	2100	**849**	**92.3**	**213**	**85.7**
Nickel	mg/kg	150	**9.67**	**8.39**	**14.0**	**11.4**
Potassium	mg/kg	NS	**560**	**715**	**422**	**1,330**
Selenium	mg/kg	39	< 3.67	< 3.19	< 4.59	< 4.03
Silver	mg/kg	39	< 0.918	< 0.798	< 1.15	< 1.01
Sodium	mg/kg	NS	< 184	< 160	< 229	< 202
Thallium	mg/kg	0.078	< 5.51	< 4.79	< 6.88	< 6.05
Vanadium	mg/kg	134	**43.8**	**24.0**	**12.6**	**28.5**
Zinc	mg/kg	2300	**35.0**	**36.8**	**39.4**	**48.4**
Mercury	mg/kg	1.1	< 0.114	< 0.105	< 0.142	< 0.122

[1] - DNREC SIRS Screening Levels for Soil Updated February 2016
Bold - indicates constituent was detected above the Method Detection Limit (MDL)
Bold and Shaded - Indicates constituent was detected above the DNREC-SIRS Screening Level for Soil (updated Feb 2016)
mg/kg - milligrams per kilogram
< 0.539 - Indicates the constituent was not detected at the method detection limit
NS - No standard for the given constituent

Table 4
Subsurface Soil - Wreck Track
PCB Aroclor, DRO, and GRO Analytical Results
May 2016

Amtrak Maintenance Facility
4001 Vandever Avenue
Wilmington, Delaware

Analysis Name	Units	DNREC-SIRS Screening Levels Soil[1]	8382790 W-1(2.3-2.5) Dry Result	8382791 W-1(2.8-3.0) Dry Result	8382792 W-1(3.3-3.5) Dry Result	8382793 W-1(3.8-4.0) Dry Result	8382794 W-1(4.3-4.5) Dry Result	8382795 W-1(4.8-5.0) Dry Result	8382800 W-1(4.0-5.0) Dry Result	8382801 W-2(2.3-2.5) Dry Result	8382802 W-2(2.0-2.5) Dry Result
PCB-1016	mg/kg	0.41	< 0.021	< 0.099	< 0.19	< 1.9	< 2.0	< 2.0	n.a.	< 0.096	n.a.
PCB-1221	mg/kg	0.2	< 0.021	< 0.099	< 0.19	< 1.9	< 2.0	< 2.0	n.a.	< 0.096	n.a.
PCB-1232	mg/kg	0.17	< 0.021	< 0.099	< 0.19	< 1.9	< 2.0	< 2.0	n.a.	< 0.096	n.a.
PCB-1242	mg/kg	0.23	< 0.021	< 0.099	< 0.19	< 1.9	< 2.0	< 2.0	n.a.	< 0.096	n.a.
PCB-1248	mg/kg	0.23	< 0.021	< 0.099	< 0.19	< 1.9	< 2.0	< 2.0	n.a.	< 0.096	n.a.
PCB-1254	mg/kg	0.12	< 0.021	< 0.099	< 0.19	< 1.9	< 2.0	< 2.0	n.a.	< 0.096	n.a.
PCB-1260	mg/kg	0.24	**0.061**	**0.28**	**1.0**	**7.1**	**7.6**	**6.9**	n.a.	**0.62**	n.a.
Total PCB Aroclors	mg/kg	0.23	**0.061**	**0.28**	**1.0**	**7.1**	**7.6**	**6.9**	n.a.	**0.62**	n.a.
TPH-GRO soil C6-C10	mg/kg	500	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	< 0.0012	n.a.	< 0.011
TPH-DRO soil C10-C28 microwave	mg/kg	2,000	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	**0.160**	n.a.	**0.140**

Analysis Name	Units	DNREC-SIRS Screening Levels Soil[1]	8382803 W-3(2.3-2.5) Dry Result	8382804 W-3(2.0-2.5) Dry Result	8382805 W-4(2.3-2.5) Dry Result	8382806 W-4(2.8-3.0) Dry Result	8382807 W-4(3.3-3.5) Dry Result	8382808 W-4(3.8-4.0) Dry Result	8382809 W-4(4.3-4.5) Dry Result	8382810 W-4(4.8-5.0) Dry Result	8382811 W-4(5.3-5.5) Dry Result	8382816 W-4(4.0-5.5) Dry Result
PCB-1016	mg/kg	0.41	< 0.11	n.a.	< 0.021	< 0.020	< 0.020	< 0.020	< 0.020	< 0.022	< 0.020	n.a.
PCB-1221	mg/kg	0.2	< 0.11	n.a.	< 0.021	< 0.020	< 0.020	< 0.020	< 0.020	< 0.022	< 0.020	n.a.
PCB-1232	mg/kg	0.17	< 0.11	n.a.	< 0.021	< 0.020	< 0.020	< 0.020	< 0.020	< 0.022	< 0.020	n.a.
PCB-1242	mg/kg	0.23	< 0.11	n.a.	< 0.021	< 0.020	< 0.020	< 0.020	< 0.020	< 0.022	< 0.020	n.a.
PCB-1248	mg/kg	0.23	< 0.11	n.a.	< 0.021	< 0.020	< 0.020	< 0.020	< 0.020	< 0.022	< 0.020	n.a.
PCB-1254	mg/kg	0.12	< 0.11	n.a.	< 0.021	< 0.020	< 0.020	< 0.020	< 0.020	< 0.022	< 0.020	n.a.
PCB-1260	mg/kg	0.24	**0.23**	n.a.	**0.088**	**0.023**	**0.029**	**0.023**	**0.057**	**0.085**	**0.120**	n.a.
Total PCB Aroclors	mg/kg	0.23	**0.23**	n.a.	**0.088**	**0.023**	**0.029**	**0.023**	**0.057**	**0.085**	**0.120**	n.a.
TPH-GRO soil C6-C10	mg/kg	500	n.a.	< 0.0015	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	< 0.0013
TPH-DRO soil C10-C28 microwave	mg/kg	2,000	n.a.	< 0.018	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	< 0.015

[1] - DNREC SIRS Screening Levels for Soil Updated February 2016
Bold - indicates constituent was detected above the Method Detection Limit (MDL)
Bold and Shaded - Indicates constituent was detected above the DNREC-SIRS Screening Level for Soil (updated Feb 2016)
mg/kg - milligrams per kilogram
ug/kg - micrograms per kilogram
< 0.016 - Indicates the constituent was not detected at the method detection limit
n.a. - not analyzed
ND - no detection of PCBs for any aroclor above the method detection limit
NS - No standard for the given constituent

Table 5
Subsurface Soil - Wreck Track
TCLP Analytical Results
May 2016

Amtrak Wilmington Maintenance Facility
4001 Vandever Avenue
Wilmington, Delaware

Analysis Name	Units	TCLP Screening Levels Soil	8382821 Wreck-TCLP Dry Result	8382822 Wreck-TCLP Dry Result
TCLP				
Benzene	mg/l	0.5	n.a.	< 0.020
2-Butanone	mg/l	200	n.a.	< 0.20
Carbon Tetrachloride	mg/l	5	n.a.	< 0.020
Chlorobenzene	mg/l	100	n.a.	< 0.020
Chloroform	mg/l	6	n.a.	< 0.020
1,2-Dichloroethane	mg/l	0.5	n.a.	< 0.020
1,1-Dichloroethene	mg/l	0.7	n.a.	< 0.020
Tetrachloroethene	mg/l	0.7	n.a.	< 0.020
Trichloroethene	mg/l	0.5	n.a.	< 0.020
Vinyl Chloride	mg/l	0.2	n.a.	< 0.020
1,4-Dichlorobenzene	mg/l	7.5	< 0.005	n.a.
2,4-Dinitrotoluene	mg/l	0.13	< 0.025	n.a.
Hexachlorobenzene	mg/l	0.13	< 0.003	n.a.
Hexachlorobutadiene	mg/l	0.5	< 0.005	n.a.
Hexachloroethane	mg/l	3	< 0.025	n.a.
2-Methylphenol	mg/l	200	< 0.005	n.a.
4-Methylphenol	mg/l	400	< 0.005	n.a.
Nitrobenzene	mg/l	2	< 0.005	n.a.
Pentachlorophenol	mg/l	100	< 0.025	n.a.
Pyridine	mg/l	5	< 0.025	n.a.
2,4,5-Trichlorophenol	mg/l	400	< 0.005	n.a.
2,4,6-Trichlorophenol	mg/l	2	< 0.005	n.a.
Arsenic	mg/l	5	< 0.0200	n.a.
Barium	mg/l	100	**0.415**	n.a.
Cadmium	mg/l	1	< 0.0050	n.a.
Chromium	mg/l	5	< 0.0150	n.a.
Lead	mg/l	5	< 0.0150	n.a.
Selenium	mg/l	1	< 0.0400	n.a.
Silver	mg/l	5	< 0.0050	n.a.
Mercury	mg/l	0.2	< 0.00020	n.a.

Bold - indicates constituent was detected above the TCLP screening levels
Bold and Shaded - Indicates constituent was detected above the TCLP screening levels
mg/L - milligrams per liter
< 0.539 - Indicates the constituent was not detected at the method detection limit
NS - No standard for the given constituent