

## Tasnif-abbasi, Maryam@DTSC

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**From:** Surrency, Ross <RSurrency@trcsolutions.com>  
**Sent:** Tuesday, June 07, 2016 2:59 PM  
**To:** Tasnif-abbasi, Maryam@DTSC; Neal, Greg@DTSC  
**Cc:** rmbeers777@hotmail.com; Vince Bartleman (v.bartleman@verizon.net); Lennon, David  
**Subject:** Riverside Ag Park  
**Attachments:** FRA Ag Park - Work Plan (June 7 2016)(FINAL).pdf

Maryam,

Attached, please find the revised Work Plan for the former Riverside Ag Park. The following changes have been made to the February 10, 2016 version of the plan:

- The Air Monitoring section on page 6 was updated to include a reference to the Air Monitoring Plan Addendum (Appendix A).
- The Cleanup Goal section on page 6 was updated to include a reference to recent soil sampling results (Appendix B).
- Figures 1-4 have been revised to indicate the correct designation of fill vs cut lots.
- Figure 5 has been updated with a current aerial photo.
- The Air Monitoring Plan Addendum was added as Appendix A.
- Appendix B was added and includes a cover letter, data summary tables including results from samples collected from March 22 to May 23, 2016 (data already provided to Greg), a site plan with sample locations, and laboratory data on a CD.

The laboratory data is being send overnight on a CD.

Please let me know if you have any questions or need additional information.

Regards,

Ross Surrency, PG  
Senior Project Geologist



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June 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 SAMPLING AND 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 soil sampling efforts conducted in November 2015, 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 0.22 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**

Work activities will begin following approval of this work plan by DTSC and EPA and are anticipated to take place over a two to three month period. The work will be conducted based on four distinct types of areas or phases as described below:

- Cut Lots - lots where soil was removed to achieve the final grade in Tract 28987;
- Fill Lots - lots where soil was imported and compacted to achieve the final grade in Tract 28987;
- Outside Areas - areas outside of the planned Phase I housing development; and
- Final Lot Sampling - final confirmation soil sampling of all lots in Tract 28987 (Phase I) housing development.

Soil sampling and removal activities for each of these areas will proceed in the following manner:

#### **Cut Lots**

- Collect step-out soil samples in four directions at 25 feet and 50 feet from sample location exceeding PCB cleanup goal. Collect samples prior to soil removal. See Figure 1 for proposed sample locations.
- Remove soil around sample location exceeding cleanup goal to 1 foot deep and out to step-out sample limits (minimum 50 foot by 50 foot square excavation). Do not excavate within 2 feet of existing concrete curbs and gutters or driveway aprons on Jurupa Avenue, Clemente Court, and Drysdale Street. Leave curbs, gutters, and driveway aprons in place.
- Collect one bottom sample per 1,000 square feet with a minimum of three samples per removal area.
- Continue step-out sampling an additional 10 feet until results are below cleanup goal (0.22 mg/kg).
- Dispose of excavated soil offsite.

#### **Fill Lots**

- Collect step-out soil samples in four directions at 60 feet from sample location exceeding PCB cleanup goal. Collect samples prior to soil removal. See Figure 2 for proposed sample locations.
- Remove soil around sample location exceeding cleanup goal to 1 foot deep and out to step-out sample limits (minimum 120 foot by 120 foot square excavation). Do not excavate within 2 feet of existing concrete curbs and gutters or driveway aprons on Jurupa Avenue, Clemente Court, and Drysdale Street. Leave curbs, gutters, and driveway aprons in place.



- Collect one bottom sample per 1,000 square feet with a minimum of three samples per removal area.
- Continue step-out sampling an additional 10 feet until results are below cleanup goal.
- Dispose of excavated soil offsite.

#### Outside Areas

- Re-sample the outside areas on a 62.5 foot grid. If a historic result is within 2 feet of the grid point and is below the cleanup goal then no sample required. See Figure 3 for proposed sample locations.
- Collect step-out soil samples in four directions at 25 and 50 feet from sample location exceeding PCB cleanup goal. Collect samples prior to soil removal.
- Remove soil around sample location exceeding cleanup goal to 1 foot deep and out to step-out sample limits (minimum 50 foot by 50 foot square excavation).
- Collect one bottom sample per 1,000 square feet with a minimum of three samples per removal area.
- Continue step-out sampling an additional 10 feet until results are below cleanup goal.
- Dispose of excavated soil offsite.
- Note: a minimum of 5 feet of clean fill will be imported and placed over all lots included in the future Phase II development area which is still in the planning phase.

#### Tract 28987 Final Lot Sampling - See Figure 4 for proposed sample locations.

- For small lots, as defined in Table 1, collect 6 samples per lot (2 front yard, 2 side yard, and 2 back yard. Soil samples will not be collected in the location of a planned house.
- For large lots, as defined in Table 1, collect 8 samples per lot (2 front yard, 4 side yard, and 2 back yard. Soil samples will not be collected in the location of a planned house.
- For cut lots, collect only surface samples (0-6 inches).
- For fill lots, collect surface samples, two foot deep samples, and for fill 8 feet or deeper, 50% of the depth of the fill (not including concrete fill material).
- For all lots, if any result exceeds the cleanup goal, remove soil in the area 2 feet deep and laterally to adjacent sample location meeting the cleanup goal, then resample.
- Continue removing and sampling until results are below cleanup goal.
- Dispose of excavated soil offsite.

### Backfilling

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 previously tested and meets the DTSC criteria for import fill soil. However, the soil will be resampled in accordance with DTSC import sampling criteria (12 samples for the first 5,000 cubic yards, then 1 sample for every 1,000 cubic yards thereafter) and the analytical results will be provided to DTSC for approval prior to beginning backfill activities.

### Underground Utility Excavation

Excavated soil from underground utility excavations in street areas for water, sewer, storm drain, telephone, gas, electric, and cable television will be stockpiled, tested, and then disposed of offsite at one of the soil disposal facilities listed below. The utility trenches will be backfilled with clean imported material. This work will be conducted after receipt of the certificate of completion from DTSC.

### Offsite Soil Disposal

- The proposed soil disposal facilities for soil containing PCBs below 50 mg/kg include the following:
  - Waste Management, Incorporated (WMI) facility at 2801 Madera Road, Simi Valley, California.
  - WMI Azusa Land Reclamation facility at 1211 W. Gladstone Street, Azusa, California.
  - WMI El Sobrante Landfill at 10910 Dawson Canyon Road, Corona, 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 5 and 6.

### Laboratory Analysis

The soil samples collected during confirmation sampling will be analyzed for PCBs using EPA Method 8082 with extraction by the Soxhlet method. The contract laboratory for this sampling effort will be Test America in Irvine, 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.

### Air Monitoring

Air monitoring will be performed during soil excavation activities according to Appendix E (Workplan for Air Monitoring) of the Frey Environmental *Revised Response Plan* dated June 19, 2006, and the TRC *Air Monitoring Plan Addendum* dated June 7, 2016 (Appendix A).

### Cleanup Goal

In accordance with the Response Plan that was approved by DTSC in 2006, all known PCBs found above the original cleanup level of 0.22 mg/kg in the November 2015 sampling event will be removed during this remediation. The 0.22 mg/kg used throughout the project is a conservative cleanup goal and lower than the level of 1 mg/kg, which EPA and DTSC considers health protective in a residential setting and falls within both agencies' acceptable risk range.

Confirmation samples will be collected during and after soil removal to ensure that the site is suitable for residential development, including sampling of each residential lot with up to eight sample locations. While it is possible that individual residual concentrations above 0.22 mg/kg may be found after the cleanup, the site will still be safe for residential use if the 95% upper confidence limit (UCL) concentrations for individual lots meet the cleanup goal of 0.22 mg/kg. A post-remediation risk evaluation will be developed in such cases for approval by DTSC.

Soil sampling results for samples collected after the initial drafting of this work plan are provided in Appendix B.

### Reporting

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.

### General

TRC will provide field oversight of excavation activities and will perform confirmation soil sampling.

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 the 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

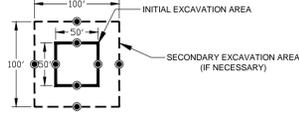
Attachments: Figure 1 - Proposed Soil Sample Locations for Cut Lots  
Figure 2 - Proposed Soil Sample Locations for Fill Lots  
Figure 3 - Proposed Soil Sample Locations for Outside Areas  
Figure 4 - Proposed Soil Sample Locations for Final Lot Sampling  
Figure 5 - Soil Transportation Route to Van Buren Boulevard  
Figure 6 - Soil Transportation Route from Van Buren Boulevard to Highway 60  
Table 1 - Individual Lot Information  
Appendix A – Air Monitoring Plan Addendum  
Appendix B – Soil Sampling Memorandum (with laboratory data provided on a CD)

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

Draft Phase 3  
July 5 2016

LEGEND

- Proposed Soil Sample Locations
- 1732 ● PCB Sample Location  
(Total PCBs < 0.22 mg/kg)
- 1731 ■ PCB Sample Location  
(Total PCBs ≥ 0.22 mg/kg)
- Cut Lots (39 total)
- Fill Lots (70 total)



NOTES:

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



1736 @ 4'	1736 N20'
0.35	52.3
1736	1736 N10'
1.12	59
1736 W20'	1736 E20'
18.59	0.921
133.76	131
1736 S10'	1736 E10'
76.8	
1736 S20'	
37.2	

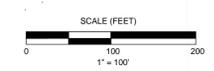


REV.	DATE	BY	DESCRIPTION	CHECKED	DATE	R.S.
DESIGNED	12/17/15	R.M.C.			12/17/15	R.S.
DRAWN	12/17/15	R.M.C.			12/17/15	R.S.
ISSUED FOR REVIEW						



PROJECT:	FORMER AGRICULTURAL PARK
FACILITY:	RIVERSIDE, CALIFORNIA

TITLE:	PROPOSED SOIL SAMPLE LOCATIONS FOR CUT LOTS
FILE NAME:	F:\RIVERSIDE-SP-REV\2015.dwg
DATE:	03/21/2016
REVISION:	
PAGE:	1 of 4
SHEET:	1

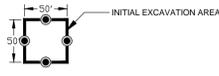


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LEGEND

- Proposed Soil Sample Locations (New 62.5 Grid)
- PCB Sample Location (Total PCBs < 0.22 mg/kg)
- PCB Sample Location (Total PCBs ≥ 0.22 mg/kg)
- Cut Lots (39 total)
- Fill Lots (70 total)



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



REV.	DATE	BY	APP.	DESCRIPTION	DATE	CHECKED	DATE
DESIGNED	12/17/15	R.M.C.			12/17/15	R.S.	12/17/15
DRAFT- ISSUED FOR REVIEW							

PROJECT: FORMER AGRICULTURAL PARK	
FACILITY: RIVERSIDE DRIVE	
LOCATION: RIVERSIDE, CALIFORNIA	

FILE NAME: F:\RIVERSIDE-SP-REV\2015.dwg	REVISION: 3
DATE: 03/21/2016	PAGE: 3 of 4

TITLE: PROPOSED SOIL SAMPLE LOCATIONS FOR OUTSIDE AREAS	
SCALE (FEET): 1" = 100'	

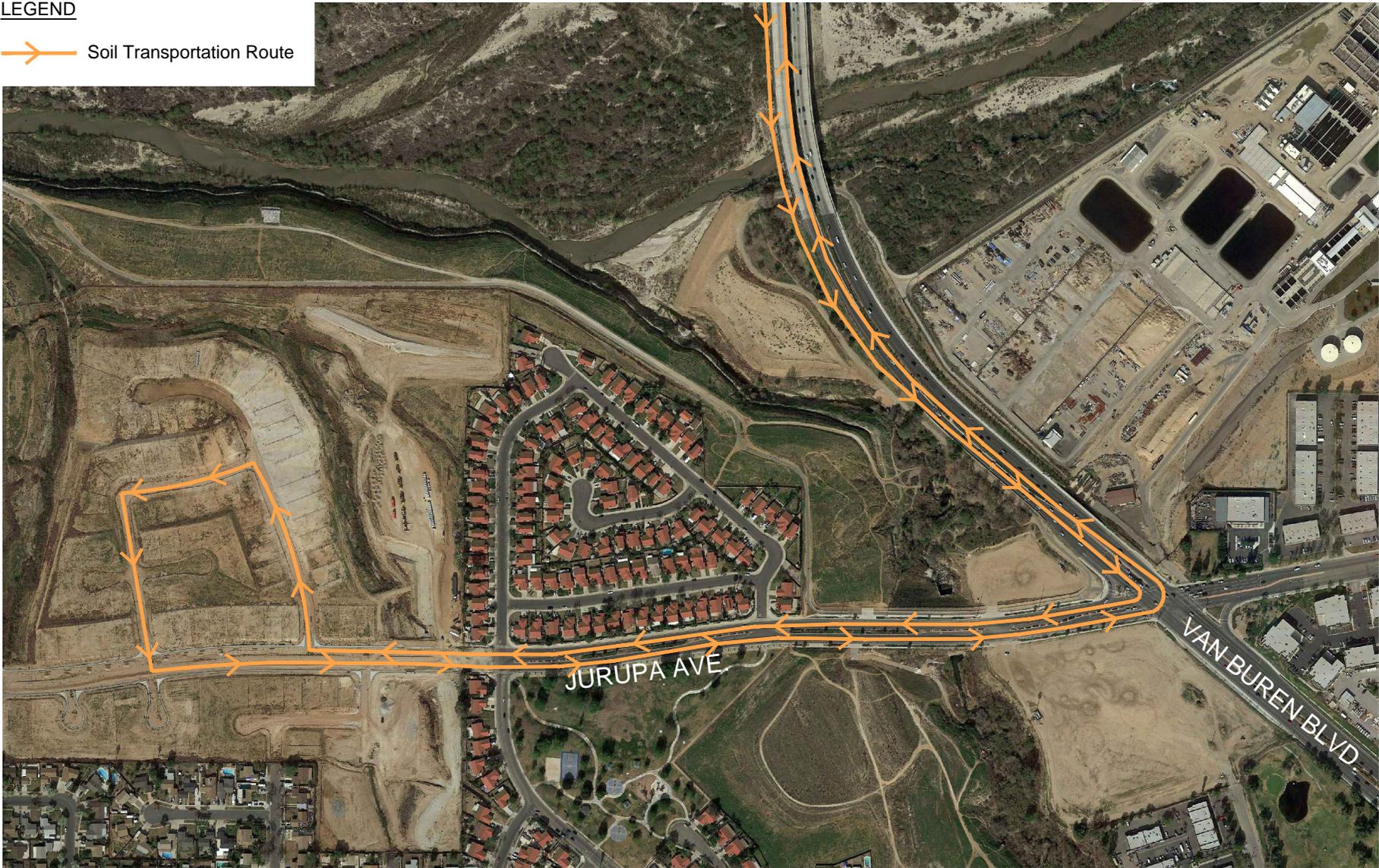
TRC  
TRC CONSULTANTS  
IRVINE, CALIFORNIA

L:\Cadd\Projects\Name\Riverside-FRACADD\FRACADD-FR\REV\2015-SP-Planview.dwg Mar 21, 2016 - 11:03am m.d.m.



**LEGEND**

→ Soil Transportation Route



SCALE (FEET)



**NOTE:**

Map provided by Google Earth Professional, dated 2/9/2016.



PROJECT: 167991

FACILITY:

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

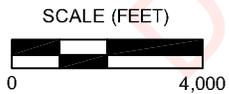
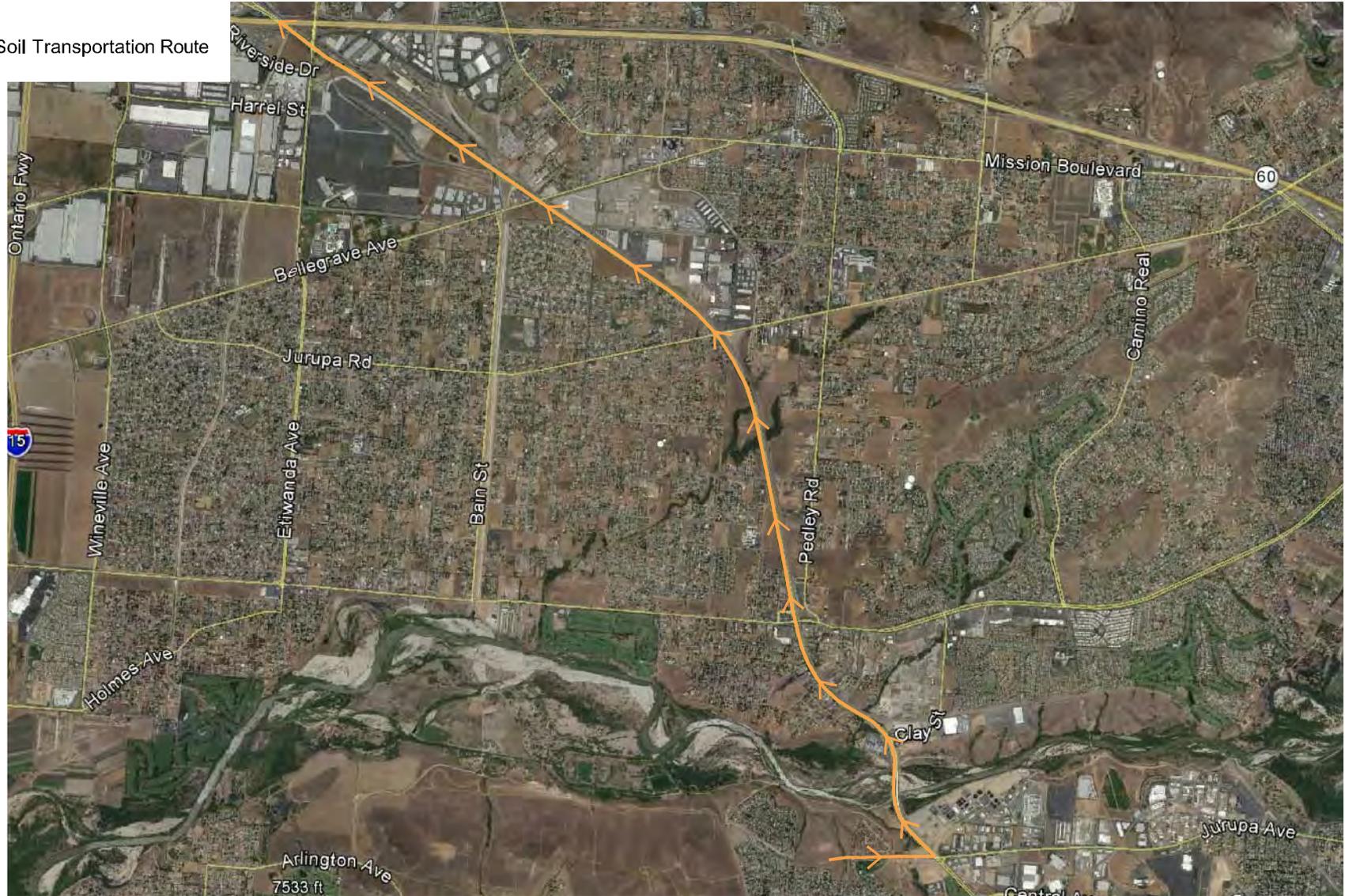
**SOIL TRANSPORTATION ROUTE TO  
VAN BUREN BOULEVARD**

**FIGURE 5**

Draft for Work Group Review

**LEGEND**

→ Soil Transportation Route



**NOTE:**

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



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 6**

Draft for Work Group Review

**Table 1**  
**Individual Lot Information**  
**Former Agricultural Park, Riverside, California**

Tr. 28987				Tr. 28987			
Lot No.	Type of Lot	Lot Size	# of Surface Samples	Lot No.	Type of Lot	Lot Size	# of Surface Samples
1	fill	small	6	58	fill	small	6
2	fill	small	6	59	fill	small	6
3	fill	small	6	60	fill	small	6
4	cut	small	6	61	fill	large	8
5	cut	small	6	62	fill	large	8
6	cut	small	6	63	fill	large	8
7	cut	small	6	64	fill	large	8
8	cut	small	6	65	fill	large	8
9	cut	small	6	66	fill	small	6
10	cut	small	6	67	fill	small	6
11	cut	small	6	68	fill	small	6
12	cut	small	6	69	fill	small	6
13	cut	small	6	70	fill	small	6
14	cut	small	6	71	fill	small	6
15	cut	small	6	72	fill	small	6
16	cut	small	6	73	fill	small	6
17	cut	small	6	74	fill	small	6
18	cut	small	6	75	fill	small	6
19	cut	small	6	76	fill	small	6
20	cut	small	6	77	fill	small	6
21	fill	small	6	78	fill	small	6
22	fill	large	8	79	cut	small	6
23	cut	large	8	80	fill	small	6
24	cut	large	8	81	fill	small	6
25	fill	large	8	82	fill	small	6
26	cut	small	6	83	fill	small	6
27	cut	small	6	84	fill	large	8
28	cut	small	6	85	fill	large	8
29	cut	small	6	86	fill	large	8
30	cut	small	6	87	fill	small	6
31	cut	small	6	88	fill	small	6
32	cut	small	6	89	fill	large	8
33	fill	small	6	90	fill	large	8
34	fill	small	6	91	fill	large	8
35	fill	small	6	92	fill	large	8
36	fill	large	8	93	fill	large	8
37	fill	large	8	94	fill	small	6
38	fill	large	8	95	cut	small	6
39	fill	large	8	96	cut	small	6
40	fill	small	6	97	fill	small	6
41	cut	small	6	98	fill	small	6
42	cut	small	6	99	fill	small	6
43	cut	small	6	100	fill	small	6
44	cut	small	6	101	fill	large	8
45	cut	small	6	102	fill	large	8
46	cut	small	6	103	fill	large	8
47	cut	small	6	104	fill	small	6
48	cut	small	6	105	fill	small	6
49	fill	small	6	106	fill	small	6
50	fill	small	6	107	fill	small	6
51	fill	small	6	108	cut	small	6
52	fill	small	6	109	cut	small	6
53	fill	small	6				
54	fill	large	8				
55	fill	large	8				
56	fill	large	8				
57	fill	small	6				

**APPENDIX A**  
**AIR MONITORING PLAN ADDENDUM**

Draft Phase 3 Excavation Plan  
July 5 2016



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June 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: AIR MONITORING PLAN ADDENDUM

Dear Ms. Tasnif-Abassi:

This document is intended to serve as an addendum to the *Workplan for Air Monitoring* provided as Appendix E in the Frey Environmental *Revised Response Plan – Excavation of Soils Containing PCBs* dated June 19, 2006. This addendum describes proposed methods to conduct upcoming air monitoring during soil removal efforts at the former Riverside Agricultural Park located at 7020 Crest Avenue in Riverside, California. Based on soil sampling efforts conducted in November 2015, 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 0.22 milligrams per kilogram (mg/kg) was present at select locations.

In 2009, Phase I of the remediation effort was conducted including excavation, removal, and proper disposal 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. 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.

In 2013/2014, Phase II of the removal effort was conducted including the excavation, removal, and disposal 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. 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).

Phase III work activities began on March 22, 2016 following approval of the *Soil Sampling and Excavation Work Plan* (TRC, 2016) by DTSC and EPA and are ongoing. The work is being conducted based on four distinct types of areas or phases as described below:

- Cut Lots - lots where soil was removed to achieve the final grade in Tract 28987;
- Fill Lots - lots where soil was imported and compacted to achieve the final grade in Tract 28987;
- Outside Areas - areas outside of the planned Phase I housing development; and
- Final Lot Sampling - final confirmation soil sampling of all lots in Tract 28987 (first phase of housing development).

Please refer to the *Soil Sampling and Excavation Work Plan* (TRC, 2016) for details regarding the sampling and excavation efforts planned for each area.

### **Background**

Construction activities, including excavation and soil loading, are capable of generating soil-derived dust. Suspension and dispersion of dust containing PCBs can be transported to nearby receptors where exposures may potentially occur. While the specific dust mitigation measures to be implemented during excavation and soil loading are intended to reduce the potential for dust generation, a program of measurement and verification is required to address the following objectives:

- Evaluate the influence of excavation activities on downwind dust concentrations,
- Identify the need for additional mitigation measures and/or work stoppage based on the dust levels observed, and
- Confirm that the concentrations of PCBs in air are below levels that are protective of public health.

Measurement of PCB concentrations in air requires the use of air sampling equipment and subsequent laboratory analysis. While air sampling approaches provide reliable measurements for presence of PCBs in air, the typical turnaround time for receipt of laboratory analytical data ranges from several days to weeks. Consequently, standard air sampling approaches may not identify an exceedance of a health-based concentration until days or weeks after the fact. In consideration of this limitation, the proposed air monitoring program is designed to provide both the efficacy of dust mitigation measures and to confirm that the work activities are performed in a manner that is protective of public health.

Real-time particulate monitoring provides more instantaneous feedback regarding the efficacy of the dust mitigation measures, but does not provide a direct measurement of the PCB concentration in air. Thus, the establishment of a health-based dust concentration limit (DCL) which is measureable by real-time air monitoring equipment is critical to preventing public exposures. The results of the particulate monitoring provide advance notice when dust levels at the project fence line approach or exceed the DCL. This allows for prompt action to address and mitigate the condition such as increasing the frequency or volume of water applied to the work area or under extreme conditions, work stoppage. Development of a health-protective DCL is an essential element of the real-time particulate monitoring program. Additional details regarding the methodology utilized to establish a health-based DCL are provided in the following section.

**Health-Based Dust Concentration Limit Determination**

Derivation of the health-based DCL assumes that the concentration of PCBs in dust is proportional to PCB concentration detected in soil. The equation that describes the calculation of the health-based DCL is provided below:

$$DCL = REL_{PCB} / [C_{PCB} \times CF]$$

Where:

DCL = Health-Based Dust Concentration Limit (µg/m<sup>3</sup>)

REL<sub>PCB</sub> = Health-Based Reference Exposure Level for PCBs in Air (µg/m<sup>3</sup>)

C<sub>PCB</sub> = Maximum Concentration of PCBs in Soil (mg/kg)

CF = Correction Factor (1E-6 kg soil/mg soil)

Based on the laboratory analytical results of soil samples collected at the Site, the maximum PCB concentration remaining is 500 mg/kg (Sample O2289-W25 at 0.5 fbg). In order to calculate the health-based DCL, a value representing the health-based reference exposure level for PCBs in air is required. Since the anticipated project duration is on the order of months as opposed to years, a chronic, non-cancer endpoint reference exposure level is a conservative and health-protective value to use for this analysis. The United States Environmental Protection Agency (USEPA) definition of a chronic exposure is one that occurs over a period of 7 years or longer. A summary of potentially applicable health-based reference exposure levels for PCBs in air in a residential setting is provided below:

Reference Exposure Level (µg/m <sup>3</sup> )	Basis for REL Value	Source of REL
7.3E-2	Chronic, Non-Cancer Endpoint (Original Value from Frey, 2006)	EPA Preliminary Remediation Goals, unspecified mixture of PCBs (USEPA, 2004)
8.0E-2	Chronic, Non-Cancer Endpoint	Human Health Risk Assessment Note 3 Table, DTSC-modified Screening Level Reference



Reference Exposure Level ( $\mu\text{g}/\text{m}^3$ )	Basis for REL Value	Source of REL
		Concentration for Aroclor 1254 (DTSC, 2016)
7.0E-2	Chronic, Non-Cancer Endpoint (route-to-route extrapolation from Oral Reference Dose [2E-5 mg/kg-day])	Integrated Risk Information System Oral Reference Dose for Aroclor 1254; extrapolated to Reference Concentration in air (USEPA, 2015)
1.2E-1	Sub-Chronic, Non-Cancer Endpoint (route-to-route extrapolation from Oral Minimum Risk Level [3E-5 mg/kg-day])	Intermediate (15 to 364 days) Oral Minimum Risk Level for PCBs (Aroclor 1254); extrapolated to Reference Concentration in air (ATSDR, 2000)
<p><b>Notes:</b></p> <p>DTSC, 2016. California Department of Toxic Substances Control. Human and Ecological Risk Office. Human Health Risk Assessment Note 3 Tables. Reference Concentration and Residential Air Screening Level for High Risk PCBs (e.g., Aroclor 1254).</p> <p>USEPA, 2004. United States Environmental Protection Agency. Region 9 Preliminary Remediation Goal Table, Air-H20, Non-Cancer Endpoint for Unspecified Mixture of PCBs, High Risk (e.g., Aroclor 1254). October.</p> <p>USEPA, 2015. United States Environmental Protection Agency. Integrated Risk Information System. Reference Exposure Level Extrapolated from Oral Reference Dose for Aroclor 1254 of 2E-5 mg/kg-day based on body weight of 70 kg and 20 m<sup>3</sup>/day inhalation rate for residential exposure.</p> <p>ATSDR, 2000. Agency for Toxic Substances and Disease Registry. Toxicological Profile for Polychlorinated Biphenyls (PCBs). November.</p>		

The potentially applicable reference exposure levels for intermediate to chronic, non-cancer effects range from 0.07 to 0.12  $\mu\text{g}/\text{m}^3$ . These values are consistent with the reference exposure level utilized in the original dust action level calculation (Frey, 2006). For the purpose of calculating an updated DCL for Phase III remediation activities, the reference exposure level of 0.07  $\mu\text{g}/\text{m}^3$  was selected to derive the health-based DCL.

Table 1 provides an overview of the health-based DCL calculation and associated assumptions and references. Based on the current maximum PCB concentration detected in soil and the reference exposure level, the calculated health-based DCL for Phase III activities is approximately 140  $\mu\text{g}/\text{m}^3$ . Dust levels below this value would not result in PCB concentrations in air above the reference exposure level of 0.07  $\mu\text{g}/\text{m}^3$ . The calculated health-based DCL is considered very conservative as it was derived based on a chronic (7 years or longer) reference exposure level and

the maximum PCB concentration detected in soil, even though the anticipated project duration is only several months and the average PCB concentration would have been a more realistic representation of PCB levels that could be carried by dust during the cleanup.

Since the health-based DCL is higher than the  $50 \mu\text{g}/\text{m}^3$   $\text{PM}_{10}$  concentration limit described in SCAQMD Rule 403 (as the difference between upwind and downwind samples) for fugitive dust controls, this lower value will represent the dust action level for the Phase III activities.

Monitoring for dioxins/furans was contemplated in the 2006 Response Plan. However, at the established dust action level ( $50 \mu\text{g}/\text{m}^3$ ) for the Phase III cleanup, the maximum predicted concentration of dioxins in air using the maximum detected concentration in soil ( $4.5\text{E}-6 \text{ mg}/\text{kg}$  after Phase II cleanup) would be  $2\text{E}-13 \text{ mg}/\text{m}^3$  (see the equation above). This value is well below the Community Action Level of  $7\text{E}-9 \text{ mg}/\text{m}^3$ , and thus dioxin/furan sampling is not needed.

It should be noted that upon completion of additional sampling that is currently underway, the health-based DCL calculation will be re-evaluated based on the maximum PCB concentration in soil. If the resulting health-based DCL is determined to be lower than  $50 \mu\text{g}/\text{m}^3$ , the lower value will be used as the dust action level during Phase III activities.

### **Proposed Air Monitoring Activities to be Performed During Phase III**

Air monitoring will be performed during earth moving activities during Phase III of the remedial effort. Air monitoring activities will include wind monitoring, particulate monitoring for dust, and monitoring for PCB concentrations in air.

#### Wind Monitoring

Wind speed and direction will be monitored with a Davis Vantage Pro 2 weather station. The weather station is battery operated and will continuously record wind speed and direction during excavation activities. Analog data will be transmitted from the wind speed and direction sensors to a data logger which will be downloaded at the end of each week.

#### Particulate Monitoring

Air monitoring for particulates ( $\text{PM}_{10}$ ) will be conducted using Met One Instruments E-BAM portable beta attenuation monitors which are Federal Equivalent Method (FEM)-approved monitors. The monitors will be operated continuously during periods of soil disturbance on days where earth moving operations occur (maximum of 8 hours per day). One upwind monitor and two downwind monitors will be placed at the perimeter of the property to provide continuous monitoring of particulate matter. Field calibration checks will be performed on a weekly basis using a BGI deltaCal<sup>®</sup> air flow calibrator.

As previously described, the health-based DCL is approximately  $140 \mu\text{g}/\text{m}^3$ . Since the SCAQMD Rule 403  $\text{PM}_{10}$  concentration is lower than the health-based value, a value of  $50 \mu\text{g}/\text{m}^3$  is selected as the dust action level for Phase III activities. This action level is measured as the difference between the upwind and downwind monitors over a one-hour period. In the event that the

difference between the upwind and downwind monitoring is greater than  $50 \mu\text{g}/\text{m}^3$ , additional dust mitigation corrective measures will be implemented. Potential corrective measures to be considered range from increasing the water application rate and/or frequency, to the suspension of work activities. In addition to continuous logging by the E-BAM units, a TRC technician will hand record hourly dust concentrations on a field data sheet to determine if additional dust mitigation corrective measures are warranted.

It should be noted that the dust action level of  $50 \mu\text{g}/\text{m}^3$  is protective of public health with regard to potential exposures to PCBs in air during Phase III cleanup, as it is more stringent than the conservative health-based DCL of  $140 \mu\text{g}/\text{m}^3$  as discussed above. By way of comparison, the dust action level utilized during Phase I and Phase II activities was  $7 \mu\text{g}/\text{m}^3$  (Frey, 2006). The lower dust action level utilized during Phase I and II activities reflected the higher concentrations of PCBs in soil that existed at the time the Phase I work was performed. The higher dust action level for Phase III activities is reflective of the significant reduction in the maximum PCB concentrations in soil that were present during the Phase I and Phase II soil removal efforts conducted in 2009 and 2013/2014.

#### PCB Air Monitoring

Monitoring for PCBs in air will be performed in accordance with EPA Method TO-10A. Air pumps capable of moving 1 to 5 liters per minute (L/min) of air will be fitted with sorbent tube polyurethane foam (PUF) sampling devices. The pumps will be placed adjacent to each of the downwind E-BAM monitors and will be operated during earth moving activities (maximum of 8 hours per day). A minimum of two samples per day will be collected on days when earth moving activities are occurring. The samples will be sent to EMSL Analytical in Cinnaminson, New Jersey for laboratory analysis for PCBs. The results of the PCB monitoring will be compared to the intermediate to chronic PCB reference exposure levels of  $0.07$  to  $0.12 \mu\text{g}/\text{m}^3$  to confirm that concentrations of PCBs in air are below levels that are protective of public health.

In summary, this Air Monitoring Plan Addendum is intended to supplement the original Air Monitoring Plan that was used for Phase I and Phase II activities (Frey, 2006). In recognition that the current maximum concentration of PCBs in soil is at least an order of magnitude lower than the concentrations that were present prior to the completed removal activities, the health-based DCL was re-evaluated. The results of the analysis indicate that, based on the current maximum concentration of PCBs in soil, the health-based DCL is higher than the SCAQMD Rule 403  $\text{PM}_{10}$  concentration ( $50 \mu\text{g}/\text{m}^3$ ). Consequently, the dust action level to be utilized during Phase III activities is  $50 \mu\text{g}/\text{m}^3$ .

Following completion of the additional soil sampling that is currently underway, the health-based DCL will be re-evaluated to consider the maximum PCB concentration in soil. The lower of the SCAQMD Rule 403  $\text{PM}_{10}$  concentration ( $50 \mu\text{g}/\text{m}^3$ ) or the health-based DCL will be used to evaluate the effectiveness of the dust mitigation measures and trigger implementation of additional dust mitigation corrective measures.



A minimum of two downwind air samples will be collected over a period of up to 8 hours during each day that excavation, loading or earth-moving activities occur. The results of the downwind air sampling will be compared to the intermediate to chronic PCB reference exposure levels of 0.07 to 0.12  $\mu\text{g}/\text{m}^3$  to confirm that concentrations of PCBs in air are below levels that are protective of public health. The air monitoring and sampling results will be reviewed on a daily basis to confirm the adequacy of the dust mitigation measures employed during Phase III activities.

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

Sincerely,



David Lennon  
Principal Consultant



Ross Surrency, PG  
Senior Project Geologist

Attachments:

Table 1 – Calculation of Health-Based Dust Concentration Limit (DCL) for PCBs

cc: Jason Low SCAQMD (electronic copy)  
Katherine Baylor, EPA (electronic copy)  
Greg Neal, DTSC (electronic copy)

**Table 1**  
**Calculation of Health-Based Dust Concentration Limit for PCBs**  
**Phase III Air Monitoring Plan Addendum**  
**Former Agricultural Park**  
**Riverside, California**

Equation		
Health-Based Dust Concentration Limit = REL/ (C <sub>soil max</sub> x CF)		
Symbol and Description	Units	Value
REL = Chronic, Non-Cancer Reference Concentration (EPA, 2015)	µg/m <sup>3</sup>	0.07
C <sub>PCB max</sub> = Maximum Concentration of PCBs in soil <sup>[1]</sup>	mg/kg	500
C <sub>PCB max</sub> = Maximum Concentration of PCBs in soil <sup>[1]</sup>	µg/kg	500,000
CF = Correction factor	kg soil/mg soil	1.00E-06
Health-Based Dust Concentration Limit	mg dust/m <sup>3</sup> air	0.14
Health-Based Dust Concentration Limit	µg dust/m <sup>3</sup> air	140
Notes:		
REL = Reference Exposure Level for PCBs in Air EPA, 2015. Integrated Risk Information System. Reference Exposure Level Extrapolated from Chronic Oral Reference Dose for Aroclor 1254 of 2E-5 mg/kg-day based on body weight of 70 kg and 20 m <sup>3</sup> /day inhalation rate for residential exposure. Levels for Residential Air.		
<sup>[1]</sup> Maximum PCB concentration in soil (500 mg/kg) in Sample O2289-W25 at 0.5 fbg (4/25/16)		
Health-Based Dust Concentration Limit represents the lowest concentration of dust in air that would not result in an exposure above the REL at the FRA Ag Park Fenceline.		
µg/kg = micrograms per kilogram mg/kg = milligrams per kilogram µg/m <sup>3</sup> = micrograms per cubic meter of air mg/m <sup>3</sup> = milligrams per cubic meter of air		

**APPENDIX B**  
**SOIL SAMPLING RESULTS MEMORANDUM**

Draft Phase 3 Excavation Plan  
July 5 2016



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June 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 SAMPLING RESULTS

Dear Ms. Tasnif-Abassi:

This deliverable is provided to update the DTSC with soil sample results for the former Riverside Agricultural Park located at 7020 Crest Avenue in Riverside, California. Work activities began on March 22, 2016 following work plan approval by the DTSC and EPA.

The following documents are provided on the enclosed Compact Disc:

- Data summary tables for the Cut Lots, Fill Lots, and Outside Areas;
- A figure of soil sample locations; and
- Official laboratory reports.

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

Sincerely,

David Lennon  
Principal Consultant

Ross Surrency, PG  
Senior Project Geologist

Enclosure

cc: Greg Neal, DTSC (electronic copy)

**Table 1  
PCB Confirmation Sample Results  
Cut Lots  
Former Agricultural Park, Riverside, California**

Cut Lot Samples					Step Out & Retest					Step Out & Retest					Step Out & Retest				
Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action
C1635-N25	0.5	3/22/2016	0.31	Excavate to 50 ft. point															
C1635-N50	0.5	3/22/2016	0.035	NFA															
C1635-E25	0.5	3/22/2016	0.0231	NFA															
C1635-E50	0.5	3/22/2016	ND	NFA															
C1635-S25	0.5	3/22/2016	0.11	NFA															
C1635-S50	0.5	3/22/2016	0.11	NFA															
C1635-W25	0.5	3/22/2016	0.16	NFA															
C1635-W50	0.5	3/22/2016	0.33	Excavate															
C1636-N25	0.5	3/22/2016	0.27	Excavate to 50 ft. point															
C1636-N50	0.5	3/22/2016	0.22	Step out 10 ft. and retest	C1636-N50	0.5	3/22/2016		No step-out sample collected due to presence of sample O2088 at same location										
C1636-E25	0.5	3/22/2016	0.12	NFA															
C1636-E50	0.5	3/22/2016	0.16	NFA															
C1636-S25	0.5	3/22/2016	0.087	NFA															
C1636-S50	0.5	3/22/2016	0.11	NFA															
C1636-W25	0.5	3/22/2016	0.20	NFA															
C1636-W50	0.5	3/22/2016	0.22	Excavate															
C1637-N25	0.5	3/22/2016	0.24	Excavate to 50 ft. point															
C1637-N50	0.5	3/22/2016	0.17	NFA															
C1637-E25	0.5	3/22/2016	0.27	Excavate to 50 ft. point															
C1637-E50	0.5	3/22/2016	0.23	Excavate															
C1637-S25	0.5	3/22/2016	0.099	NFA															
C1637-S50	0.5	3/22/2016	0.085	NFA															
C1637-W25	0.5	3/22/2016	0.22	Excavate to 50 ft. point															
C1637-W50	0.5	3/22/2016	0.30	Excavate															
C1638-N25	0.5	3/22/2016	0.21	NFA															
C1638-N50	0.5	3/22/2016	0.16	NFA															
C1638-E25	0.5	3/22/2016	0.30	Excavate to 50 ft. point															
C1638-E50	0.5	3/22/2016	0.41	Excavate															
C1638-S25	0.5	3/22/2016	0.036	NFA															
C1638-S50	0.5	3/22/2016	0.12	NFA															
C1638-W25	0.5	3/22/2016	0.33	Excavate to 50 ft. point															
C1638-W50	0.5	3/22/2016	0.31	Excavate															
C1639-N25	0.5	3/23/2016	0.44	Excavate to 50 ft. point															
C1639-N50	0.5	3/23/2016	0.0099J	NFA															
C1639-E25	0.5	3/23/2016	0.29	Excavate to 50 ft. point															
C1639-E50	0.5	3/23/2016	0.41	Excavate															
C1639-S25	0.5	3/23/2016	0.08	NFA															
C1639-S50	0.5	3/23/2016	0.011J	NFA															
C1639-W25	0.5	3/23/2016	0.41	Excavate to 50 ft. point															
C1639-W50	0.5	3/23/2016	0.40	Excavate															
C1640-N25	0.5	3/23/2016	0.17	NFA															
C1640-N50	0.5	3/23/2016	0.15	NFA															
C1640-E25	0.5	3/23/2016	0.30	Excavate to 50 ft. point															
C1640-E50	0.5	3/23/2016	0.58	Excavate															
C1640-S25	0.5	3/23/2016	0.12	NFA															
C1640-S50	0.5	3/23/2016	0.028J	NFA															
C1640-W25	0.5	3/23/2016	0.43	Excavate to 50 ft. point															
C1640-W50	0.5	3/23/2016	0.63	Excavate															
C1640-N25	0.5	3/23/2016	0.10	NFA															
C1640-N50	0.5	3/23/2016	0.17	NFA															
C1640-E25	0.5	3/23/2016	0.32	Excavate to 50 ft. point															
C1640-E50	0.5	3/23/2016	0.26	Excavate															
C1640-S25	0.5	3/23/2016	0.13	NFA															
C1640-S50	0.5	3/23/2016	0.10	NFA															
C1640-W25	0.5	3/23/2016	0.28	Excavate to 50 ft. point															
C1640-W50	0.5	3/23/2016	0.071	NFA															
C1660-N25	0.5	3/23/2016	ND	NFA															
C1660-N50	0.5	3/23/2016	ND	NFA															
C1660-E25	0.5	3/23/2016	0.17	NFA															
C1660-E50	0.5	3/23/2016	0.92	Step out 10 ft. and retest	C1660-E60	0.5	4/21/2016	2.4	Step out 10 ft. and retest	C1660-E60	0.5	4/21/2016		No step-out sample collected due to presence of sample O1659-W45 at same location					
C1660-S25	0.5	3/23/2016	0.30	Excavate to 50 ft. point															
C1660-S50	0.5	3/23/2016	0.0092J	NFA															
C1660-W25	0.5	3/23/2016	0.0085J	NFA															
C1660-W50	0.5	3/23/2016	0.0099J	NFA															
C1676-N25	0.5	3/23/2016	0.037	NFA															
C1676-N50	0.5	3/23/2016	0.011J	NFA															
C1676-E25	0.5	3/23/2016	0.14	NFA															
C1676-E50	0.5	3/23/2016	0.35	Step out 10 ft. and retest	C1676-E50	0.5	3/23/2016		No step-out sample collected due to presence of sample O2225 at same location										
C1676-S25	0.5	3/23/2016	ND	NFA															
C1676-S50	0.5	3/23/2016	0.14	NFA															
C1676-W25	0.5	3/23/2016	ND	NFA															
C1676-W50	0.5	3/23/2016	ND	NFA															
C1674-N25	0.5	3/23/2016	ND	NFA															
C1674-N50	0.5	3/23/2016	0.154	NFA															
C1674-E25	0.5	3/23/2016	0.036	NFA															
C1674-E50	0.5	3/23/2016	0.207	NFA															
C1674-S25	0.5	3/23/2016	0.19	NFA															
C1674-S50	0.5	3/23/2016	0.259	Step out 10 ft. and retest	C1674-S50	0.5	3/23/2016		No step-out sample collected due to presence of sample F1662-N60 at same location										
C1674-W25	0.5	3/23/2016	0.088	NFA															
C1674-W50	0.5	3/23/2016	0.092J	NFA															
C1687-N25	0.5	3/23/2016	0.036	NFA															
C1687-N50	0.5	3/23/2016	0.26	Step out 10 ft. and retest	C1687-N60	0.5	4/11/2016	ND	NFA										
C1687-E25	0.5	3/23/2016	0.253	Excavate to 50 ft. point															
C1687-E50	0.5	3/23/2016	ND	NFA															
C1687-S25	0.5	3/23/2016	0.332	Excavate to 50 ft. point															
C1687-S50	0.5	3/23/2016	0.41	Step out 10 ft. and retest	C1687-S60	0.5	4/11/2016	ND	NFA										
C1687-W25	0.5	3/23/2016	2.16	Excavate to 50 ft. point															
C1687-W50	0.5	3/23/2016	0.594	Step out 10 ft. and retest	C1687-W60	0.5	4/21/2016	0.34	Step out 10 ft. and retest	C1687-W60	0.5	4/21/2016		No step-out sample collected due to presence of sample F1688-E60 at same location					
C1716-N25	0.5	3/24/2016	ND	NFA															
C1716-N50	0.5	3/24/2016	ND	NFA															
C1716-E25	0.5	3/24/2016	ND	NFA															
C1716-E50	0.5	3/24/2016	ND	NFA															
C1716-S25	0.5	3/24/2016	ND	NFA															

**Table 1**  
**PCB Confirmation Sample Results**  
**Cut Lots**  
**Former Agricultural Park, Riverside, California**

Cut Lot Samples					Step Out & Retest					Step Out & Retest					Step Out & Retest									
Sample ID	Sample Depth (fbg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (fbg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (fbg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (fbg)	Date Collected	PCBs (mg/kg)	Action					
C1716-S50	0.5	3/24/2016	ND	NFA																				
C1716-W25	0.5	3/24/2016	0.073	NFA																				
C1716-W50	0.5	3/24/2016	ND	NFA																				
C1714-N25	0.5	3/24/2016	0.0151	NFA																				
C1714-N50	0.5	3/24/2016	0.0251	NFA																				
C1714-E25	0.5	3/24/2016	ND	NFA																				
C1714-E50	0.5	3/24/2016	ND	NFA																				
C1714-S25	0.5	3/24/2016	ND	NFA																				
C1714-S50	0.5	3/24/2016	0.11	NFA																				
C1714-W25	0.5	3/24/2016	0.18	NFA																				
C1714-W45	0.5	3/24/2016	0.068	NFA																				
C1713-N25	0.5	3/24/2016	0.10	NFA																				
C1713-N50	0.5	3/24/2016	0.15	NFA																				
C1713-E25	0.5	3/24/2016	0.0121	NFA																				
C1713-E50	0.5	3/24/2016	0.068	NFA																				
C1713-S25	0.5	3/24/2016	0.099	NFA																				
C1713-S50	0.5	3/24/2016	0.086	NFA																				
C1713-W25	0.5	3/24/2016	0.067	NFA																				
C1713-W50	0.5	3/24/2016	0.12	NFA																				
C1709-N25	0.5	3/24/2016	ND	NFA																				
C1709-N50	0.5	3/24/2016	0.0141	NFA																				
C1709-E25	0.5	3/24/2016	0.27	Excavate to 50 ft. point																				
C1709-E50	0.5	3/24/2016	ND	NFA																				
C1709-S25	0.5	3/25/2016	1.0	Excavate to 50 ft. point																				
C1709-S50	0.5	3/25/2016	0.62	Step out 10 ft. and retest	C1709-S60	0.5	4/11/2016	0.43	Step out 10 ft. and retest	C1709-S70	0.5	4/25/2016	0.38	Step out 10 ft. and retest	C1709-S80	0.5	5/3/2016	0.40	Step out 10 ft. and retest	C1709-S90	0.5	5/12/2016	0.37	No step-out sample collected due to presence of sample C1694 in same vicinity.
C1709-W25	0.5	3/25/2016	0.95	Excavate to 50 ft. point																				
C1709-W50	0.5	3/25/2016	0.57	Step out 10 ft. and retest	C1709-W60	0.5	4/11/2016	0.11951	NFA															

Notes: NFA = No further action. Result is <0.22 mg/kg.  
mg/kg = milligrams per kilogram  
fbg = feet below grade

Draft Phase 3 Exacto/Ally/MS  
July 5 2016

**Table 2**  
**PCB Confirmation Sample Results**  
**Fill Lots**  
**Former Agricultural Park, Riverside, California**

Fill Lot Samples					Step Out & Retest					Step Out & Retest					Step Out & Retest					Step Out & Retest							
Sample ID	Sample Depth (fbg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (fbg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (fbg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (fbg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (fbg)	Date Collected	PCBs (mg/kg)	Action			
F1612-N60	0.5	3/25/2016	0.083	NFA																							
F1612-E60	0.5	3/25/2016	0.052	NFA																							
F1612-S60	0.5	3/25/2016	0.078	NFA																							
F1613-N60	0.5	3/25/2016	0.041	NFA																							
F1613-S60	0.5	3/25/2016	0.37	Step out 10 ft. and retest	F1613-S70	0.5	4/12/2016	0.509	Step out 10 ft. and retest	F1613-S80	0.5	4/27/2016	0.43	Step out 10 ft. and retest	Unable to step out any further due to south fenceline.												
F1614-S60	0.5	3/25/2016	0.23	Step out 10 ft. and retest	F1614-S70	0.5	4/12/2016	1.54	Step out 10 ft. and retest	F1614-S80	0.5	4/27/2016	0.65	Step out 10 ft. and retest	Unable to step out any further due to south fenceline.												
F1614-N60	0.5	3/25/2016	0.15	NFA																							
F1614-W60	0.5	3/25/2016	0.13	NFA																							
F1616-E60	0.5	3/25/2016	0.22	Step out 10 ft. and retest	F1616-E70	0.5	4/12/2016	0.065	NFA																		
F1616-S60	0.5	3/25/2016	0.063	NFA																							
F1616-W60	0.5	3/25/2016	0.041	NFA																							
F1627-S60	0.5	3/25/2016	0.098	NFA																							
F1627-E60	0.5	3/25/2016	0.0080J	NFA																							
F1625-S60	0.5	3/25/2016	0.14	NFA																							
F1619-E60	0.5	3/25/2016	0.080	NFA																							
F1619-W60	0.5	3/25/2016	0.010J	NFA																							
F1619-S60	0.5	3/25/2016	0.027J	NFA																							
F1623-S60	0.5	3/25/2016	0.20	NFA																							
F1623-W60	0.5	3/25/2016	0.89	Step out 10 ft. and retest	F1623-W70	0.5	4/11/2016	0.62	Step out 10 ft. and retest	F1623-W80	0.5	4/27/2016	0.55	Step out 10 ft. and retest	F1623-W90	0.5	5/10/2016	0.30	Step out 10 ft. and retest	F1623-W100	0.5	5/20/2016	0.19	NFA			
F1623-N60	0.5	3/25/2016	0.46	Step out 10 ft. and retest	F1623-N70	0.5	4/11/2016	0.296	Step out 10 ft. and retest	F1623-N78	0.5	4/27/2016	0.25	Step out 10 ft. and retest	F1623-N90	0.5	5/10/2016	0.38	Step out 10 ft. and retest	F1623-N100	0.5	5/20/2016	0.070	NFA			
F1624-N52	0.5	3/28/2016	0.212	NFA																							
F1625-N60	0.5	3/28/2016	0.301	Step out 10 ft. and retest	F1625-N70	0.5	4/11/2016	0.143J	NFA																		
F1641-W60	0.5	3/28/2016	0.47	Step out 10 ft. and retest	F1641-W70	0.5	4/11/2016	0.31	Step out 10 ft. and retest	F1641-W80	0.5	4/27/2016	0.43	Step out 10 ft. and retest	F1641-W90	0.5	5/10/2016	0.47	Step out 10 ft. and retest	F1641-W100	0.5	5/20/2016	0.20	NFA			
F1641-N60	0.5	3/28/2016	0.42	Step out 10 ft. and retest	F1641-N70	0.5	4/11/2016	0.186J	NFA																		
F1004-N60	0.5	3/28/2016	0.091	NFA																							
F1004-E60	0.5	3/28/2016	0.53	Step out 10 ft. and retest																							
F1647-E60	0.5	3/28/2016	0.043	NFA																							
F1647-S60	0.5	3/28/2016	0.104	NFA																							
F1646-S60	0.5	3/28/2016	0.253	Step out 10 ft. and retest	F1646-S70	0.5	4/11/2016	0.877	Step out 10 ft. and retest	F1646-S80	0.5	4/27/2016	0.43	Step out 10 ft. and retest	F1646-S90	0.5	5/10/2016	0.35	Step out 10 ft. and retest	F1646-S100	0.5	5/20/2016	0.17	NFA			
F1646-W60	0.5	3/28/2016	0.132J	NFA																							
F1667-W60	0.5	3/28/2016	0.692	Step out 10 ft. and retest	F1667-W70	0.5	4/11/2016	0.208J	NFA																		
F1669-W60	0.5	3/28/2016	0.071	NFA																							
F1690-W60	0.5	3/28/2016	52.9	Step out 10 ft. and retest	F1690-W70	0.5	4/11/2016	0.52	Step out 10 ft. and retest	F1690-W80	0.5	4/27/2016	0.32	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2289 in same vicinity.												
F1670-N60	0.5	3/28/2016	0.145J	NFA																							
F1690-N60	0.5	3/28/2016	0.487	Step out 10 ft. and retest	F1690-N70	0.5	4/11/2016	0.024J	NFA																		
F1690-E60	0.5	3/28/2016	0.239	Step out 10 ft. and retest	F1690-E70	0.5	4/11/2016	0.233	Step out 10 ft. and retest	F1690-E80	0.5	4/27/2016	0.24	Step out 10 ft. and retest	F1690-E90	0.5	5/10/2016	0.66	Step out 10 ft. and retest	F1690-E100	0.5	5/20/2016	0.12	NFA			
F1670-E60	0.5	3/28/2016	1.38	Step out 10 ft. and retest	F1670-E70	0.5	4/11/2016	1.1	Step out 10 ft. and retest	F1670-E80	0.5	4/27/2016	0.19	NFA													
F1665-N60	0.5	3/28/2016	2.61	Step out 10 ft. and retest	F1665-N70	0.5	4/11/2016	0.26	Step out 10 ft. and retest	F1665-N80	0.5	4/27/2016	0.48	Step out 10 ft. and retest	F1665-N90	0.5	5/10/2016	0.042	NFA								
F1665-E60	0.5	3/28/2016	ND	NFA																							
F1665-S60	0.5	3/28/2016	0.036	NFA																							
F1651-S60	0.5	3/28/2016	2.0	Step out 10 ft. and retest																							
F1651-W60	0.5	3/28/2016	0.16	NFA																							
F1651-E60	0.5	3/28/2016	0.52	Step out 10 ft. and retest	F1651-E70	0.5	4/12/2016	0.071	NFA																		
F1662-W60	0.5	3/28/2016	0.025J	NFA																							
F1662-E60	0.5	3/28/2016	0.50	Step out 10 ft. and retest	F1662-E70	0.5	4/12/2016	0.343	Step out 10 ft. and retest	F1662-E80	0.5	4/27/2016	1.0	Step out 10 ft. and retest	F1662-E90	0.5	5/10/2016	0.43	Step out 10 ft. and retest	F1662-E100	0.5	5/20/2016	0.26	No step-out sample collected due to presence of sample F1661 in same vicinity.			
F1662-N60	0.5	3/28/2016	0.48	Step out 10 ft. and retest																							
F1654-S60	0.5	3/28/2016	0.038	NFA																							
F1654-E60	0.5	3/28/2016	0.92	Step out 10 ft. and retest																							
F1654-N60	0.5	3/28/2016	0.038	NFA																							
F1653-N60	0.5	3/28/2016	0.056	NFA																							
F1653-W60	0.5	3/28/2016	0.43	Step out 10 ft. and retest	F1653-W70	0.5	4/12/2016	0.965	Step out 10 ft. and retest	F1653-W80	0.5	4/27/2016	0.21	NFA													
F1653-S60	0.5	3/28/2016	0.11	NFA																							
F1693-E60	0.5	3/29/2016	0.232	Step out 10 ft. and retest	F1693-E70	0.5	4/11/2016	0.093	NFA																		
F1693-N60	0.5	3/29/2016	0.185J	NFA																							
F1692-N60	0.5	3/29/2016	0.257	Step out 10 ft. and retest	F1692-N70	0.5	4/11/2016	0.054	NFA																		
F1692-W60	0.5	3/29/2016	0.294	Step out 10 ft. and retest	F1692-W70	0.5	4/11/2016	0.60	Step out 10 ft. and retest	F1692-W80	0.5	4/27/2016	0.055	NFA													
F1688-E60	0.5	3/29/2016	0.72	Step out 10 ft. and retest	F1688-E70	0.5	4/11/2016	0.36	Step out 10 ft. and retest	No step-out sample collected due to presence of sample C1687-W60 at same location.																	
F1688-S60	0.5	3/29/2016	0.78	Step out 10 ft. and retest	F1688-S70	0.5	4/11/2016	0.019J	NFA																		
F1688-W60	0.5	3/29/2016	0.079	NFA																							
F1730-N60	0.5	3/29/2016	6.7	Step out 10 ft. and retest	F1730-N70	0.5	4/11/2016	0.187J	NFA																		
F1730-E60	0.5	3/29/2016	0.984	Step out 10 ft. and retest	F1730-E70	0.5	4/11/2016	0.213J	NFA																		
F1730-W60	0.5	3/29/2016	0.288	Step out 10 ft. and retest	F1730-W70	0.5	4/11/2016	0.40	Step out 10 ft. and retest	F1730-W80	0.5	4/27/2016	2.0	Step out 10 ft. and retest	F1730-W90	0.5	5/10/2016	1.5	Step out 10 ft. and retest	F1730-W100	0.5	5/20/2016	1.1	No step-out sample collected due to presence of sample F1006 in same vicinity.			
F1730-S60	0.5	3/29/2016	0.415	Step out 10 ft. and retest	No step-out sample collected due to presence of sample C1714-N50 in same vicinity.																						

Notes: NFA = No further action. Result is <0.22 mg/kg.  
mg/kg = milligrams per kilogram  
fbg = feet below grade

**Table 3  
PCB Confirmation Sample Results  
Outside Areas  
Former Agricultural Park, Riverside, California**

Outside Area Samples					Step Out & Retest					Step Out & Retest					Step Out & Retest					Step Out & Retest						
Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	
O1601-S25	0.5	3/29/2016	0.51	Step out 10 ft. and retest	O1601-S35	0.5	4/12/2016	0.162J	NFA																	
O1601-E25	0.5	3/29/2016	0.047	NFA																						
O1601-N25	0.5	3/29/2016	0.88	Step out 10 ft. and retest	O1601-N35	0.5	4/12/2016	0.817	Step out 10 ft. and retest	O1601-N45	0.5	4/27/2016	0.15	NFA												
O1601-W25	0.5	3/29/2016	0.28	Step out 10 ft. and retest	O1601-W35	0.5	4/12/2016	0.334	Step out 10 ft. and retest	O1601-W45	0.5	4/27/2016	4.3	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2070 in same vicinity											
O1607-W25	0.5	3/29/2016	ND	NFA																						
O1607-S25	0.5	3/29/2016	0.40	Step out 10 ft. and retest	O1607-S35	0.5	4/12/2016	0.533	Step out 10 ft. and retest	O1607-S45	0.5	4/27/2016	0.95	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2061 in same vicinity											
O1607-N25	0.5	3/29/2016	0.15	NFA																						
O1607-E25	0.5	3/29/2016	0.11	NFA																						
O1606-S25	0.5	3/29/2016	0.12	NFA																						
O1606-W25	0.5	3/29/2016	0.086	NFA																						
O1606-E25	0.5	3/29/2016	0.053	NFA																						
O1606-N25	0.5	3/29/2016	0.12	NFA																						
O1609-S25	0.5	3/29/2016	0.32	Step out 10 ft. and retest	O1609-S35	0.5	4/12/2016	0.180J	NFA																	
O1609-E25	0.5	3/29/2016	0.19	NFA																						
O1609-W25	0.5	3/29/2016	ND	NFA																						
O1609-N25	0.5	3/29/2016	0.17	NFA																						
O1602-N25	0.5	3/29/2016	0.20	NFA																						
O1602-W25	0.5	3/29/2016	0.20	NFA																						
O1602-S25	0.5	3/29/2016	0.13	NFA																						
O1602-E25	0.5	3/29/2016	0.037	NFA																						
O1610-S25	0.5	3/29/2016	0.162	NFA																						
O1610-N25	0.5	3/29/2016	0.212	NFA																						
O1610-W25	0.5	3/29/2016	0.153	NFA																						
O1610-E25	0.5	3/29/2016	0.15	NFA																						
O2008	0.5	3/30/2016	0.034	NFA																						
O2009	0.5	3/30/2016	0.27	Step out 25 ft. in 4 directions and retest	O2009-E25	0.5	4/13/2016	0.13	NFA	O2009-W25	0.5	4/13/2016	0.17	NFA	Could not step out south due to fence Could not step out north due to a rock pile.											
O2010	0.5	3/30/2016	0.15	NFA																						
O2012	--	--	--	Not sampled due to rock pile.																						
O2013	0.5	3/30/2016	0.11	NFA																						
O2011	0.5	3/30/2016	0.11	NFA																						
O2014	0.5	3/30/2016	0.14	NFA																						
O2016	0.5	3/30/2016	0.061	NFA																						
O2017	0.5	3/30/2016	0.11	NFA																						
O1604-S25	0.5	3/30/2016	0.14	NFA																						
O1604-W25	0.5	3/30/2016	0.090	NFA																						
O1604-E25	0.5	3/30/2016	0.026J	NFA																						
O1604-N25	0.5	3/30/2016	0.15	NFA																						
O2085	0.5	3/30/2016	0.12	NFA																						
O2084	0.5	3/30/2016	0.72	Step out 25 ft. in 4 directions and retest	O2084-N25	0.5	4/13/2016	0.060	NFA	O2084-E35	0.5	4/27/2016	0.16	NFA	No step-out sample collected due to presence of sample O1602-N25 at same location											
					O2084-E25	0.5	4/13/2016	0.38	Step out 10 ft. and retest																	
					O2084-S25	0.5	4/13/2016	0.25	Step out 10 ft. and retest																	
					O2084-W25	0.5	4/13/2016	0.13	NFA																	
O2080	0.5	3/30/2016	0.24	Step out 25 ft. in 4 directions and retest	O2080-N25	0.5	4/13/2016	0.13	Step out 10 ft. and retest	O2080-N35	0.5	4/27/2016	0.26	Step out 10 ft. and retest	O2080-N45	0.5	5/11/2016	0.057	NFA							
					O2080-E25	0.5	4/13/2016	0.17	NFA																	
					O2080-S25	0.5	4/13/2016	0.57	Step out 10 ft. and retest	O2080-S35	0.5	4/27/2016	0.013 J	NFA												
					O2080-W25	0.5	4/13/2016	0.045	NFA																	
O2079	0.5	3/30/2016	0.21	NFA																						
O2049	0.5	3/30/2016	0.145	NFA																						
O2022	0.5	3/30/2016	ND	NFA																						
O2050	0.5	3/30/2016	0.689	Step out 25 ft. in 4 directions and retest	O2050-N25	0.5	4/13/2016	ND	NFA	O2050-E35	0.5	4/27/2016	0.51	Step out 10 ft. and retest	O2050-E45	0.5	5/11/2016	0.36	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2049 in same vicinity						
					O2050-E25	0.5	4/13/2016	0.40	Step out 10 ft. and retest	O2050-S35	0.5	4/27/2016	0.13	NFA												
					O2050-S25	0.5	4/13/2016	0.57	Step out 10 ft. and retest	O2050-W35	0.5	4/27/2016	0.74	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1606-E25 in same vicinity											
					O2050-W25	0.5	4/13/2016	1.7	Step out 10 ft. and retest																	
O2078	0.5	3/30/2016	0.245	Step out 25 ft. in 4 directions and retest	O2078-N25	0.5	4/13/2016	0.082	NFA																	
					O2078-E25	0.5	4/13/2016	0.072	NFA																	
					O2078-S25	0.5	4/13/2016	0.17	NFA																	
					O2078-W25	0.5	4/13/2016	0.15	NFA																	
O2051	0.5	3/30/2016	0.033	NFA																						
O2063	0.5	3/30/2016	ND	NFA																						
O2064	0.5	3/30/2016	0.031	NFA																						
O2065	0.5	3/30/2016	0.50	Step out 25 ft. in 4 directions and retest	O2065-N25	0.5	4/13/2016	0.052	NFA	O2065-E25	0.5	4/13/2016	0.13	NFA	O2065-S15	0.5	4/13/2016	0.20	NFA	O2065-W25	0.5	4/13/2016	0.183J	NFA		
					O2065-E25	0.5	4/13/2016	0.13	NFA																	
					O2065-S15	0.5	4/13/2016	0.20	NFA																	
					O2065-W25	0.5	4/13/2016	0.183J	NFA																	
O2066	0.5	3/30/2016	0.031J	NFA																						
O2067	0.5	3/30/2016	0.058	NFA																						
O2068	0.5	3/30/2016	0.551	Step out 25 ft. in 4 directions and retest	O2068-E25	0.5	4/13/2016	0.20	NFA	O2068-S25	0.5	4/13/2016	0.079													



**Table 3**  
**PCB Confirmation Sample Results**  
**Outside Areas**  
**Former Agricultural Park, Riverside, California**

Outside Area Samples					Step Out & Retest					Step Out & Retest					Step Out & Retest					Step Out & Retest						
Sample ID	Sample Depth (ftg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ftg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ftg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ftg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ftg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	
					O2131-E25	0.5	4/19/2016	0.067	NFA																	
					O2131-S25	0.5	4/19/2016	0.66	Step out 10 ft. and retest	O2131-S35	0.5	5/3/2016	0.383	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2130 in same vicinity											
					O2131-W25	0.5	4/19/2016	ND	NFA																	
O2130	0.5	4/1/2016	ND	NFA																						
O2129	0.5	4/1/2016	--	Container broke during shipping. Retest.	O2129	0.5	4/13/2016	0.25	Step out 25 ft. in 4 directions and retest	O2129-N25	0.5	4/28/2016	0.065	NFA												
O2118	0.5	4/1/2016	ND	NFA						O2129-E25	0.5	4/28/2016	ND	NFA												
O2110	0.5	4/1/2016	ND	NFA						O2129-W25	0.5	4/28/2016	0.025 J	NFA												
O2109	0.5	4/1/2016	ND	NFA						O2129-S25	0.5	4/28/2016	0.18	NFA												
O2108	0.5	4/1/2016	ND	NFA																						
O2132	0.5	4/1/2016	ND	NFA																						
O1703-W25	0.5	4/1/2016	0.013J	NFA																						
O1703-N25	0.5	4/1/2016	0.031J	NFA																						
O1703-E25	0.5	4/1/2016	0.023J	NFA																						
O1703-S25	0.5	4/1/2016	0.022J	NFA																						
O2133	0.5	4/1/2016	0.26	Step out 25 ft. in 4 directions and retest	O2133-N25	0.5	4/19/2016	0.053	NFA																	
					O2133-E25	0.5	4/19/2016	0.25	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2167 at same location																
					O2133-S25	0.5	4/19/2016	0.10	NFA																	
					O2133-W25	0.5	4/19/2016	ND	NFA																	
O2164	0.5	4/1/2016	0.01J	NFA																						
O2134	0.5	4/1/2016	0.34	Step out 25 ft. in 4 directions and retest	O2134-N25	0.5	4/19/2016	0.11	NFA																	
					O2134-E25	0.5	4/19/2016	0.077	NFA																	
					O2134-S25	0.5	4/19/2016	0.11	NFA																	
					O2134-W25	0.5	4/19/2016	0.13	NFA																	
O2135	0.5	4/1/2016	--	Container broke during shipping. Retest.	O2135	0.5	4/13/2016	0.047	NFA																	
O2169	0.5	4/1/2016	ND	NFA																						
O1721-N25	0.5	4/1/2016	0.05	NFA																						
O1721-W25	0.5	4/1/2016	0.059	NFA																						
O1721-E25	0.5	4/1/2016	0.089	NFA																						
O1721-S25	0.5	4/1/2016	0.081	NFA																						
O2161	0.5	4/1/2016	0.016J	NFA																						
O2163	0.5	4/1/2016	0.048	NFA																						
O2162	0.5	4/1/2016	0.0086J	NFA																						
O1001-S25	0.5	4/1/2016	0.068	NFA																						
O1001-E25	0.5	4/1/2016	0.17	NFA																						
O1001-W25	0.5	4/1/2016	0.94	Step out 10 ft. and retest	O1001-W35	0.5	4/15/2016	0.57	Step out 10 ft. and retest	O1001-W45	0.5	4/29/2016	1.2	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2137 in same vicinity											
O1001-N25	0.5	4/1/2016	0.32	Step out 10 ft. and retest	O1001-N35	0.5	4/15/2016	0.54	Step out 10 ft. and retest	O1001-N42	0.5	4/29/2016	0.111J	NFA												
O2156	0.5	4/1/2016	ND	NFA																						
O2155	0.5	4/1/2016	ND	NFA																						
O2154	0.5	4/1/2016	ND	NFA																						
O2153	0.5	4/1/2016	ND	NFA																						
O2136	0.5	4/1/2016	0.38	Step out 25 ft. in 4 directions and retest	O2136-N25	0.5	4/19/2016	0.61	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2137-S25 at same location																
					O2136-E25	0.5	4/19/2016	0.028J	NFA																	
					O2136-S25	0.5	4/19/2016	0.11	NFA																	
					O2136-W25	0.5	4/19/2016	0.10	NFA																	
O2137	0.5	4/1/2016	0.35	Step out 25 ft. in 4 directions and retest	O2137-N25	0.5	4/19/2016	0.78	Step out 10 ft. and retest	O2137-N35	0.5	4/29/2016	0.20	NFA												
					O2137-E25	0.5	4/19/2016	0.53	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2136-N25 at same location																
					O2137-S25	0.5	4/19/2016	0.62	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1724-E25 at same location																
					O2137-W25	0.5	4/19/2016	0.62	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1001-W35 at same location																
O2142	0.5	4/1/2016	0.12	NFA																						
O2152	0.5	4/1/2016	ND	NFA																						
O1724-S25	0.5	4/1/2016	0.29	Step out 10 ft. and retest	O1724-S35	0.5	4/19/2016	0.051	NFA																	
O1724-E25	0.5	4/1/2016	0.12	NFA																						
O2186	0.5	4/1/2016	0.13	NFA																						
O1724-N25	0.5	4/1/2016	0.12	NFA																						
O1724-W25	0.5	4/1/2016	0.12	NFA																						
O1723-N25	0.5	4/1/2016	--	Container broke during shipping. Retest.	O1723-N25	0.5	4/13/2016	0.81	Step out 10 ft. and retest	O1723-N35	0.5	4/29/2016	0.083	NFA												
O1723-W25	0.5	4/1/2016	0.14	NFA																						
O1723-S25	0.5	4/1/2016	0.11	NFA																						
O1723-E25	0.5	4/1/2016	0.028J	NFA																						
O1002-W25	0.5	4/4/2016	0.48	Step out 10 ft. and retest	O1002-W35	0.5	4/15/2016	0.52	Step out 10 ft. and retest	O1002-W45	0.5	4/29/2016	0.59	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2147 in same vicinity											
O1002-N25	0.5	4/4/2016	0.41	Step out 10 ft. and retest	O1002-N35	0.5	4/15/2016	0.14	NFA																	
O1002-S25	0.5	4/4/2016	0.62	Step out 10 ft. and retest	O1002-S35	0.5	4/15/2016	0.31	Step out 10 ft. and retest	O1002-S45	0.5	4/29/2016	ND	NFA												
O1002-E25	0.5	4/4/2016	0.66	Step out 10 ft. and retest	O1002-E35	0.5	4/15/2016	0.52	Step out 10 ft. and retest	O1002-E45	0.5	4/29/2016	0.35	Step out 10 ft. and retest	O1002-E55	0.5	5/20/2016	0.32	Step out 10 ft. and retest	No step-out sample collected due to presence of property fence line						
O2197	0.5	4/4/2016	0.17	NFA																						
O2147	0.5	4/4/2016	0.44	Step out 25 ft. in 4 directions and retest	O2147-N25	0.5	4/15/2016	0.23	Step out 10 ft. and retest	O2147-N35	0.5	4/29/2016	0.14	NFA												
					O2147-W25	0.5	4/15/2016	0.50	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1723-E25 at same location																
					O2147-S25	0.5	4/15/2016	0																		



**Table 3  
PCB Confirmation Sample Results  
Outside Areas  
Former Agricultural Park, Riverside, California**

Outside Area Samples					Step Out & Retest					Step Out & Retest					Step Out & Retest					Step Out & Retest							
Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ft)	Date Collected	PCBs (mg/kg)	Action	Sample ID		
O1719-E25	0.5	4/6/2016	1.9	Step out 10 ft. and retest	Could not step out due to a concrete debris pile.																						
O1719-N25	0.5	4/6/2016	0.69	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2248-S25 at same location																						
O1719-S25	0.5	4/6/2016	0.011J	NFA																							
O1719-W25	0.5	4/6/2016	3.6	Step out 10 ft. and retest	O1719-W35	0.5	5/2/2016	1.5	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2273-E25 in same vicinity																	
O2248	0.5	4/6/2016	1.9	Step out 25 ft. in 4 directions and retest	O2248-N25	0.5	4/20/2016	0.029J	NFA																		
					O2248-E25	0.5	4/20/2016	1.8	Step out 10 ft. and retest	O2248-E35	0.5	5/2/2016	0.16	NFA													
					O2248-S25	0.5	4/20/2016	0.62	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1719-N25 at same location																	
					O2248-W25	0.5	4/20/2016	0.024J	NFA																		
O2272	0.5	4/6/2016	0.80	Step out 25 ft. in 4 directions and retest	O2272-N25	0.5	4/21/2016	1.0	Step out 10 ft. and retest	O2272-N35	0.5	5/3/2016	0.86	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2271 in same vicinity												
					O2272-E25	0.5	4/21/2016	ND	NFA																		
					O2272-S25	0.5	4/21/2016	4.3	Step out 10 ft. and retest	O2272-S35	0.5	5/3/2016	1.2	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2273-E35 in same vicinity												
					O2272-W25	0.5	4/21/2016	0.99	Step out 10 ft. and retest	O2272-W35	0.5	5/3/2016	1.2	Step out 10 ft. and retest	O2272-W45	0.5	5/12/2016	0.13	NFA								
O2271	0.5	4/6/2016	0.046	NFA																							
O2270	0.5	4/6/2016	0.064	NFA																							
O2500	0.5	4/6/2016	5.7	Step out 25 ft. in 4 directions and retest	O2500-N25	0.5	4/25/2016	1.1	Step out 10 ft. and retest	O2500-N35	0.5	5/3/2016	1.4	Step out 10 ft. and retest	O2500-N45	0.5	5/12/2016	0.23	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2268-S35 in same vicinity							
					O2500-E25	0.5	4/25/2016	0.37	Step out 10 ft. and retest	O2500-E35	0.5	5/3/2016	7.9	Step out 10 ft. and retest	O2500-E45	0.5	5/12/2016	2.0	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2270 in same vicinity							
					O2500-S25	0.5	4/25/2016	30	Step out 10 ft. and retest	O2500-S35	0.5	5/3/2016	3.5	Step out 10 ft. and retest	O2500-S45	0.5	5/12/2016	2.1	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1726-N35 in same vicinity							
					O2500-W25	0.5	4/25/2016	6.2	Step out 10 ft. and retest	O2500-W35	0.5	5/3/2016	0.38	Step out 10 ft. and retest	O2500-W45	0.5	5/12/2016	12	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2260 in same vicinity							
O2277	0.5	4/6/2016	0.11	NFA																							
O2278	0.5	4/6/2016	0.040	NFA																							
O2279	0.5	4/6/2016	ND	NFA																							
O2280	0.5	4/6/2016	ND	NFA																							
O2281	0.5	4/6/2016	ND	NFA																							
O1668-S25	0.5	4/6/2016	0.015J	NFA																							
O1668-N25	0.5	4/6/2016	0.32	Step out 10 ft. and retest	O1668-N35	0.5	4/21/2016	0.40	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2286-S25 at same location																	
O1668-W25	0.5	4/6/2016	2.86	Step out 10 ft. and retest	O1668-W35	0.5	4/21/2016	0.038	NFA																		
O1668-E25	0.5	4/6/2016	0.251	Step out 10 ft. and retest	O1668-E35	0.5	4/21/2016	0.011J	NFA																		
O2286	0.5	4/6/2016	0.53	Step out 25 ft. in 4 directions and retest	O2286-N25	0.5	4/21/2016	5.6	Step out 10 ft. and retest	O2286-N35	0.5	5/3/2016	3.9	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1737-E25 in same vicinity												
					O2286-E25	0.5	4/21/2016	0.31	Step out 10 ft. and retest	O2286-E35	0.5	5/3/2016	0.043	NFA													
					O2286-S25	0.5	4/21/2016	0.33	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1668-N35 at same location																	
					O2286-W25	0.5	4/21/2016	0.10	NFA																		
O2306	0.5	4/6/2016	6.92	Step out 25 ft. in 4 directions and retest	O2306-N25	0.5	4/21/2016	4.9	Step out 10 ft. and retest	O2306-N35	0.5	5/3/2016	2.9	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1737-W35 in same vicinity												
					O2306-E25	0.5	4/21/2016	ND	NFA																		
					O2306-S25	0.5	4/21/2016	17	Step out 10 ft. and retest	O2306-S35	0.5	5/3/2016	ND	NFA													
					O2306-W25	0.5	4/21/2016	0.056	NFA																		
O2287	0.5	4/6/2016	0.31	Step out 25 ft. in 4 directions and retest	O2287-N25	0.5	4/21/2016	0.055	NFA																		
					O2287-E25	0.5	4/21/2016	0.58	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2286-E25 at same location																	
					O2287-W25	0.5	4/21/2016	0.75	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1737-E25 at same location																	
					No east step-out sample collected due to presence of sample F1669-W60 at same location																						
O1737-E25	0.5	4/6/2016	ND	NFA																							
O1737-S25	0.5	4/6/2016	ND	NFA																							
O1737-N25	0.5	4/6/2016	0.013J	NFA																							
O1737-W25	0.5	4/6/2016	2.6	Step out 10 ft. and retest	O1737-W35	0.5	4/21/2016	1.2	Step out 10 ft. and retest	O1737-W45	0.5	5/3/2016	0.72	Step out 10 ft. and retest	O1737-W55	0.5	5/12/2016	0.29	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2307 in same vicinity							
O2307	0.5	4/6/2016	0.058	NFA																							
O2312	0.5	4/6/2016	0.18	NFA																							
O2311	0.5	4/6/2016	1.3	Step out 25 ft. in 4 directions and retest	O2311-N25	0.5	4/21/2016	2.6	Step out 10 ft. and retest	O2311-N35	0.5	5/3/2016	3.2	Step out 10 ft. and retest	O2311-N45	0.5	5/12/2016	3.2	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1736-S20 in same vicinity							
					O2311-E25	0.5	4/21/2016	4.3	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2288-W25 at same location																	
					O2311-S25	0.5	4/21/2016	0.012J	NFA																		
					O2311-W25	0.5	4/21/2016	ND	NFA																		
O2314	0.5	4/6/2016	15	Step out 25 ft. in 4 directions and retest	O2314-N25	0.5	4/22/2016	18	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2322-S25 in same vicinity																	
					O2314-E25	0.5	4/22/2016	0.60	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2318-W25 in same vicinity																	
					O2314-S25	0.5	4/22/2016	8.1	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2313-N25 in same vicinity																	
					O2314-W25	0.5	4/22/2016	1.4	Step out 10 ft. and retest	O2314-W35	0.5	5/10/2016	0.039	NFA													
O2313	0.5	4/6/2016	0.24	Step out 25 ft. in 4 directions and retest	O2313-N25	0.5	4/21/2016	1.6	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2314-S25 in same vicinity																	
					O2313-E25	0.5	4/21/2016	1.8	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1716-W20 in same vicinity																	
					O2313-S25	0.5	4/21/2016	0.85	Step out 10 ft. and retest	O2313-S35	0.5	5/10/2016	0.45	Step out 10 ft. and retest	O2313-S45	0.5	5/23/2016	0.72	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2312 in same vicinity							
					O2313-W25	0.5	4/21/2016	0.064	NFA	O2313-W35	0.5	5/10/2016	0.25	Step out 10 ft. and retest	O2313-W45	0.5	5/23/2016	ND	NFA								
O2318	0.5	4/6/2016	14	Step out 25 ft. in 4 directions and retest	O2318-N25	0.5	4/22/2016	19	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1735-S35 in same vicinity																	
					O2318-E25	0.5	4/22/2016	0.047	NFA																		
					O2318-S25	0.5	4/22/2016	8.3	Step out 10 ft. and retest	No step-out sample collected due to presence of DTSC sample B4-N20 in same vicinity																	
					O2318-W25	0.5	4/22/2016	20	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2314-E35 in same vicinity																	
O1735-W25	0.5	4/6/2016	0.12	NFA																							
O1735-S25	0.5	4/6/2016	4.2	Step out 10 ft. and retest	O1735-S35	0.5	4/22/2016	2.2	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2318-N25 in same vicinity																	
O1735-N20	0.5	4/6/2016	0.096	NFA																							
O1735-E25	0.5	4/6/2016	0.99	Step out 10 ft. and retest	O1735-E35	0.5	4/22/2016	25	Step out 10 ft. and retest	O1735-E45	0.5	5/10/2016	1.6	Step out 10 ft. and retest	O1735-E55	0.5	5/23/2016	0.21</									

**Table 3  
PCB Confirmation Sample Results  
Outside Areas  
Former Agricultural Park, Riverside, California**

Outside Area Samples					Step Out & Retest					Step Out & Retest					Step Out & Retest					Step Out & Retest							
Sample ID	Sample Depth (ftg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ftg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ftg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ftg)	Date Collected	PCBs (mg/kg)	Action	Sample ID	Sample Depth (ftg)	Date Collected	PCBs (mg/kg)	Action	Sample ID		
O1711-S25	0.5	4/7/2016	0.017J	NFA																							
O1711-W25	0.5	4/7/2016	0.96	Step out 10 ft. and retest	O1711-W35	0.5	4/25/2016	0.49	Step out 10 ft. and retest	O1711-W45	0.5	5/10/2016	10	Step out 10 ft. and retest	O1711-W55	0.5	5/23/2016	0.16	NFA								
O2295	0.5	4/7/2016	0.054	NFA																							
O2300	0.5	4/7/2016	0.22	Step out 25 ft. in 4 directions and retest	O2300-N25	0.5	4/25/2016	1.078	Step out 10 ft. and retest	O2300-N35	0.5	5/10/2016	1.1	Step out 10 ft. and retest	O2300-N45	0.5	5/23/2016	0.24	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1712 in same vicinity							
					O2300-E25	0.5	4/25/2016	1.366	Step out 10 ft. and retest	O2300-E35	0.5	5/10/2016	3.9	Step out 10 ft. and retest	O2300-E45	0.5	5/23/2016	0.083	NFA								
					O2300-W25	0.5	4/25/2016	9.8	Step out 10 ft. and retest	O2300-W35	0.5	5/10/2016	1.6	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2501-E25 in same vicinity												
					No south step-out sample collected due to presence of sample O1711-N25 at same locator																						
O2301	0.5	4/7/2016	0.10	NFA																							
O1731-N25	0.5	4/7/2016	0.18	NFA																							
O1731-E25	0.5	4/7/2016	0.14	NFA																							
O1731-S25	0.5	4/7/2016	0.41	Step out 10 ft. and retest	O1731-S35	0.5	4/25/2016	0.37	Step out 10 ft. and retest	O1731-S45	0.5	5/12/2016	0.21	NFA													
O1731-W25	0.5	4/7/2016	0.012J	NFA																							
O2322	0.5	4/7/2016	9.89	Step out 25 ft. in 4 directions and retest	O2322-N25	0.5	4/25/2016	2.2	Step out 10 ft. and retest	O2322-N35	0.5	5/12/2016	0.76	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2323 in same vicinity												
					O2322-E25	0.5	4/25/2016	5.9	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1735-W25 in same vicinity																	
					O2322-S25	0.5	4/25/2016	5.52	Step out 10 ft. and retest	O2322-S35	0.5	5/12/2016	8.4	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2314-N25 in same vicinity												
					O2322-W25	0.5	4/25/2016	0.25	Step out 10 ft. and retest	O2322-W35	0.5	5/12/2016	0.17	NFA													
O2323	0.5	4/7/2016	0.137J	NFA																							
O2325	0.5	4/7/2016	ND	NFA																							
O2326	0.5	4/7/2016	0.010J	NFA																							
O2327	0.5	4/7/2016	ND	NFA																							
O2328	0.5	4/7/2016	ND	NFA																							
O2329	0.5	4/7/2016	ND	NFA																							
O2330	0.5	4/7/2016	0.169J	NFA																							
O2331	0.5	4/7/2016	8.0	Step out 25 ft. in 4 directions and retest	O2331-N25	0.5	4/25/2016	21	Step out 10 ft. and retest	O2331-N35	0.5	5/12/2016	70	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2504-S25 in same vicinity												
					O2331-E25	0.5	4/25/2016	4.9	Step out 10 ft. and retest	O2331-E35	0.5	5/12/2016	0.72	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2301 in same vicinity												
					O2331-S25	0.5	4/25/2016	7.3	Step out 10 ft. and retest	O2331-S35	0.5	5/12/2016	4.8	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2503-N25 in same vicinity												
					O2331-W25	0.5	4/25/2016	0.66	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2330 in same vicinity																	
O2332	0.5	4/7/2016	ND	NFA																							
O2324	0.5	4/7/2016	3.9	Step out 25 ft. in 4 directions and retest	O2324-N25	0.5	4/25/2016	0.018J	NFA																		
					O2324-S25	0.5	4/25/2016	3.1	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O1735-N20 in same vicinity																	
					O2324-W25	0.5	4/25/2016	0.049	NFA																		
					No east step-out sample collected due to presence of sample O2505-W25 at same locator																						
O2501	0.5	4/7/2016	1.44	Step out 25 ft. in 4 directions and retest	O2501-N25	0.5	4/18/2016	2.8	Step out 10 ft. and retest	O2501-N35	0.5	5/2/2016	0.88	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2503-S25 in same vicinity												
					O2501-E25	0.5	4/18/2016	7.4	Step out 10 ft. and retest	O2501-E35	0.5	5/2/2016	0.14	NFA													
					O2501-S25	0.5	4/18/2016	0.45	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2502-N25 at same locator																	
					O2501-W25	0.5	4/18/2016	43	Step out 10 ft. and retest	O2501-W35	0.5	5/2/2016	1.9	Step out 10 ft. and retest	No step-out sample collected due to presence of sample O2332 in same vicinity												

Notes: NFA = No further action. Result is <0.22 mg/kg.  
mg/kg = milligrams per kilogram  
ftg = feet below grade

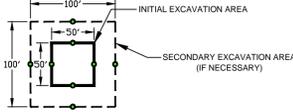
Draft Phase 3 Excavation  
July 5 2016

- LEGEND**
- 1732 ● PCB Sample Location  
(Total PCBs < 0.22 mg/kg)
  - 0.18 ■ PCB Sample Location  
(Total PCBs < 0.22 mg/kg)
  - 1731 ■ PCB Sample Location  
(Total PCBs ≥ 0.22 mg/kg)
  - Cut Lots (39 total)
  - Fill Lots (70 total)

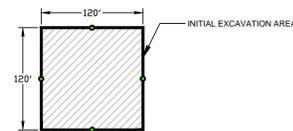
**Outside Area Samples 2016**



**Cut Lot Samples 2016**

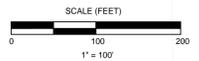
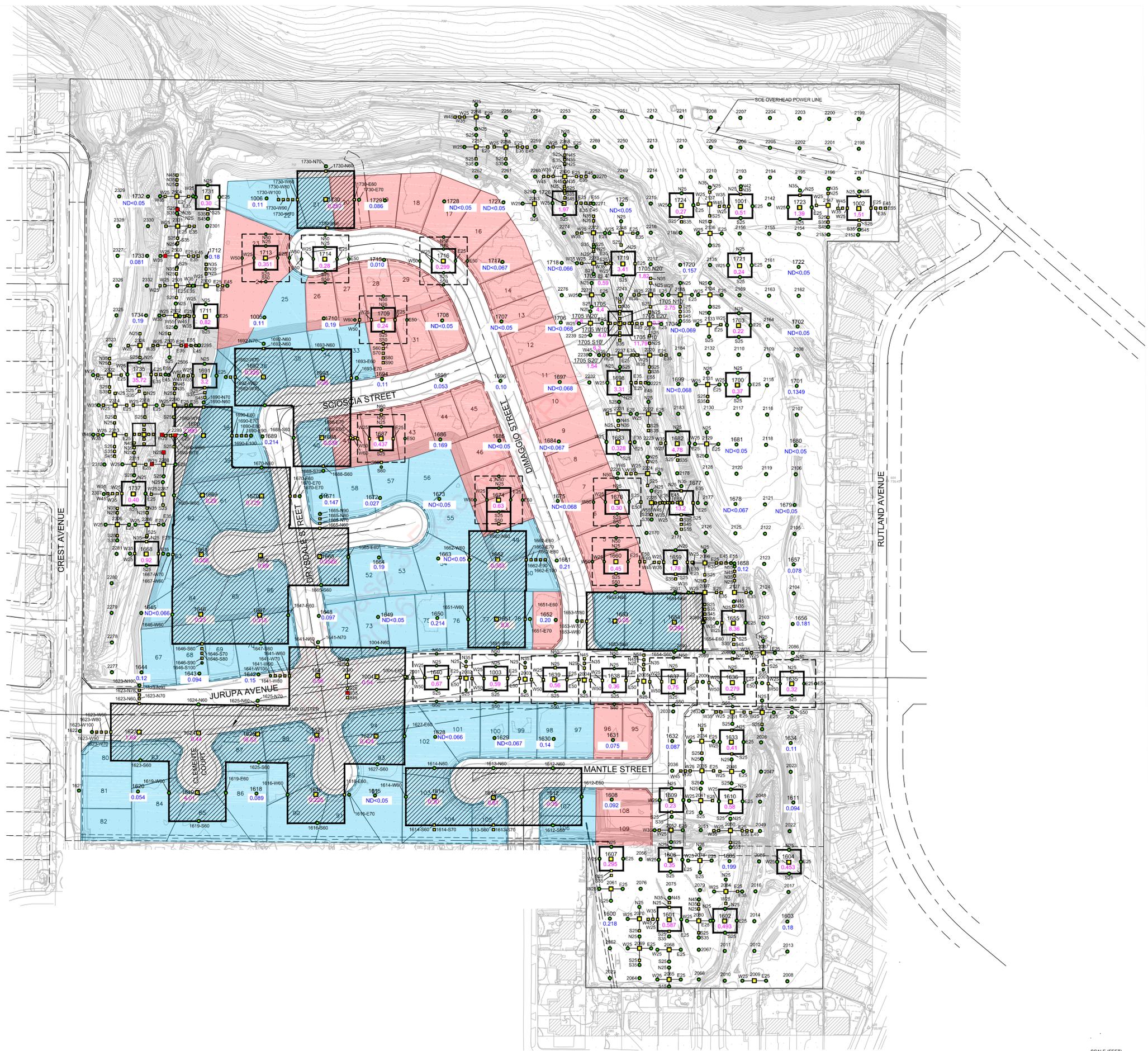


**Fill Lot Samples 2016**



**NOTES:**

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



PROJECT: FORMER AGRICULTURAL PARK		DRAFT-ISSUED FOR REVIEW	
FACILITY: RIVERSIDE DRIVE		DATE: 04/12/2016	DATE: 12/17/15
SITE: RIVERSIDE - CALIFORNIA		DESIGNED: R.S.	CHECKED: R.S.
DRAWN BY: [Name]		DATE: 12/17/15	DATE: 12/17/15
REVISED BY: [Name]		DATE: 12/17/15	DATE: 12/17/15
DATE: 04/12/2016		REVISED: R.S.	DATE: 12/17/15
FILE NAME: F:\RIVERSIDE-SP-REV\0105.dwg		REVISION: [ ]	SHEET: 5
DATE: 04/12/2016		PAGE: 3 of 4	

**SOIL SAMPLE LOCATIONS**

LEGEND

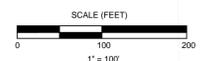
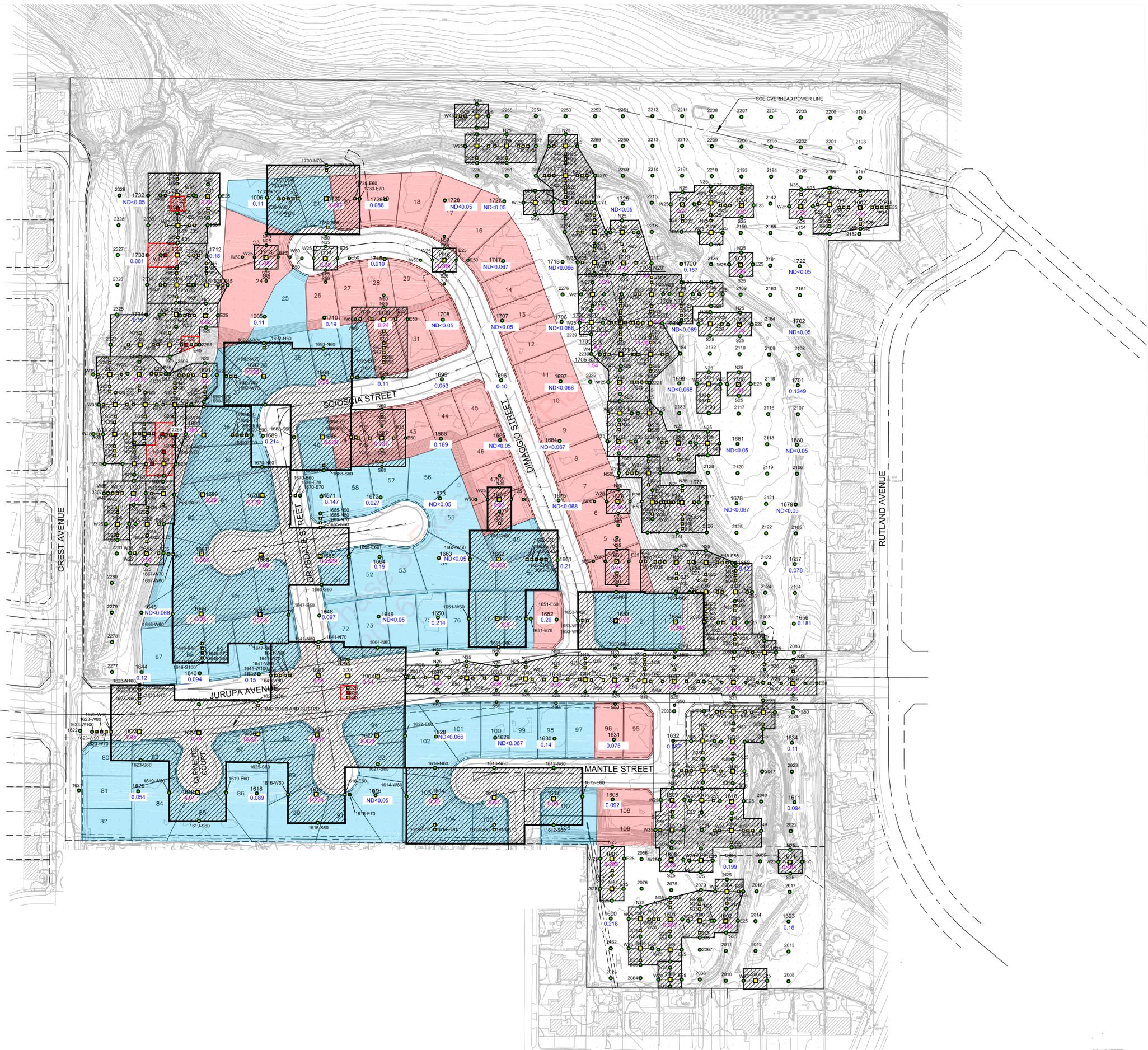
- 1732 ● PCB Sample Location  
(Total PCBs < 0.22 mg/kg)
- 0.18
- 1731 ■ PCB Sample Location  
(Total PCBs ≥ 0.22 mg/kg)
- 131
- 2288-N25 ■ PCB Sample Location  
(Total PCBs ≥ 50 mg/kg)
- Cut Lots (39 total)
- Fill Lots (70 total)

AREAS TO BE EXCAVATED



NOTES:

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



REV.	DATE	BY	APP.	DESCRIPTION	DATE	CHECKED	DATE
DESIGNED	12/17/15	R.M.C.			12/17/15	R.S.	12/17/15
DRAWN BY							
DRAFT-ISSUED FOR REVIEW							



PROJECT:	234976.0000.0000
FACILITY:	FORMER AGRICULTURAL PARK
ADDRESS:	7020 CREST AVENUE RIVERSIDE, CALIFORNIA

TITLE:	SOIL REMOVAL AREAS
FILE NAME:	F:\RIVERSIDE-SP-REV\2015.dwg
DATE:	04/12/2016
REVISION:	-
PAGE:	3 of 4
SHEET:	5