MINUTES OF RESTORATION ADVISORY BOARD (RAB) AND PUBLIC MEETING NOVEMBER 9, 1994

To: NSB-NLON RAB Members

From: Matt Cochran of Halliburton NUS Corporation

Subject: Restoration Advisory Board and Public Meeting - November 9, 1994
Installation Restoration Program
Naval Submarine Base - New London
Groton, Connecticut

Attendees

The Following people attended the meeting.

Sue Pezzullo	RAB Co-Chair
Kymberlee Keckler	USEPA
Barry Giroux	Atlantic Environmental
Felix Prokopus	Groton Resident
Mark Leipert	NORTHDIV
Bart Pearson	Groton Resident
Mark Evans	NORTHDIV
Stacy Gent	COMSUBGRU 2
Harry Watson	RAB Member
Deborah Downie	RAB Member
Andy Stackpole	SUBASE NLON
Christine Williams	USEPA
Mark Lewis	CTDEP
Matt Cochran	HNUS
Tim Evans	HNUS
Franco LaGreca	NORTHDIV
Katherine Fogarty	Menzie-Cura and Associates
Martha Fraenkel	Town of Groton Planning Department
John Hutten	Groton Resident

Andy Stackpole opened the meeting and welcomed all attendees. Andy stated the purpose of the RAB and introduced the new RAB members(Sue Pezzulo, Harry Watson, and Deborah Downie). Each individual stated their objective as a RAB member.

Agenda

The general agenda of the meeting included the following topics

Review of August 11, 1994 meeting minutes

Overview of the IR process

Introduction of sites under investigation

Status of remedial action projects

Review of August 11, 1994 meeting minutes

Andy Stackpole reviewed the minutes from the last RAB meeting.

Overview of IR process

Andy Stackpole introduced Kymberlee Keckler of the USEPA who provided an overview of the IR process. A copy of the overheads and a summary of the discussion provided is included in Attachment 1.

Question: Harry Watson asked how long it would take for the Subase to be delisted from the NPL.

Response: Kymberlee Keckler indicated the RI/FS stage lasts approximately two years. Christine Williams indicated that after the RI/FS for a site is completed, a decision is made regarding the most effective option for site cleanup. Approximately one year after the cleanup has started, a decision is made to determine whether the cleanup process is working properly. After all the sites have gone through this process and cleanup is completed, then the base can be delisted from the NPL. Sue Pezzullo replied that some sites have been under investigation for years.

Introduction of sites under investigation

Andy Stackpole introduced Matt Cochran who provided an introduction of the sites under investigation. A copy of the overheads is included in Attachment 2.

Question from public representative: Where did the ash come from?

Response: Matt Cochran indicated that the ash was derived from burning in an incinerator that existed at the site until 1963.

Question from public representative: What were the pesticide bricks used for and are they still produced?

Response: Matt Cochran indicated that the pesticide bricks were placed on the ice during the winter in the Area A wetland. As the ice melts, the pesticide bricks decompose and provide mosquito control. This practice was most likely discontinued in the 1970s when DDT was outlawed as a pesticide.

Question from public representative: Where is the discharge point for the Torpedo Shops septic system located?

Response: Matt Cochran indicated that the septic system is closed and the discharge is routed to a base sanitary sewer system.

Status of Remedial Action Projects

Andy Stackpole introduced Mark Evans who provided a status of the remedial action activities being conducted at the Area A Landfill, the Spent Acid Storage and Disposal Area, and the DRMO. Mark also discussed the schedule for delivery for the final Site Investigation (SI) report and the upcoming Remedial Investigation (RI) planned for Pier 33 and Berth 16. A copy of the overheads is included in Attachment 3.

Mark Evans introduced Mark Leipert who provided a discussion of the Building 31 Remediation Activities. A copy of the overheads is included in Attachment 4.

Upcoming RAB meeting

The date for the next RAB meeting was set for February 8, 1995 at 7:00 in the Shepard of the Sea Chapel. Andy Stackpole indicated that the intent of the evening meeting was to get more public involvement in the IR process, however, an evaluation will be made based on the attendance of the next meeting regarding optimum meeting times. The preliminary agenda for the next meeting will include:

Review of Minutes - Andrew Stackpole / SUBASE
Status of Current Investigations - Matt Cochran / HNUS
Status of Remedial Actions and FFA - Mark Evans / NORTHDIV
Open Discussion
Set Next Meeting Agenda and Date
Adjourne

Tank Farm Remediation Activities

Andy Stackpole provided a discussion of the planned closure activities for the Tank Farm located at the Ball fields.

Question from public representative: Will the piping be left in place during Closure activities?

Response: Andy Stackpole indicated that accessible piping will be removed whereas the inaccessible piping will be left in place. Some pipes will also be replaced.

Additional discussions / questions

The group discussed RAB member attendance. It was agreed that members who missed two consecutive meetings would be asked to resign from the RAB. An option to this scenario would be to designate alternates to attend the meetings in their absence. Alternates must be approved by the RAB and SUBASE.

Question from public representative: Can solid debris at the OBDA be removed as an Interim Removal Action?

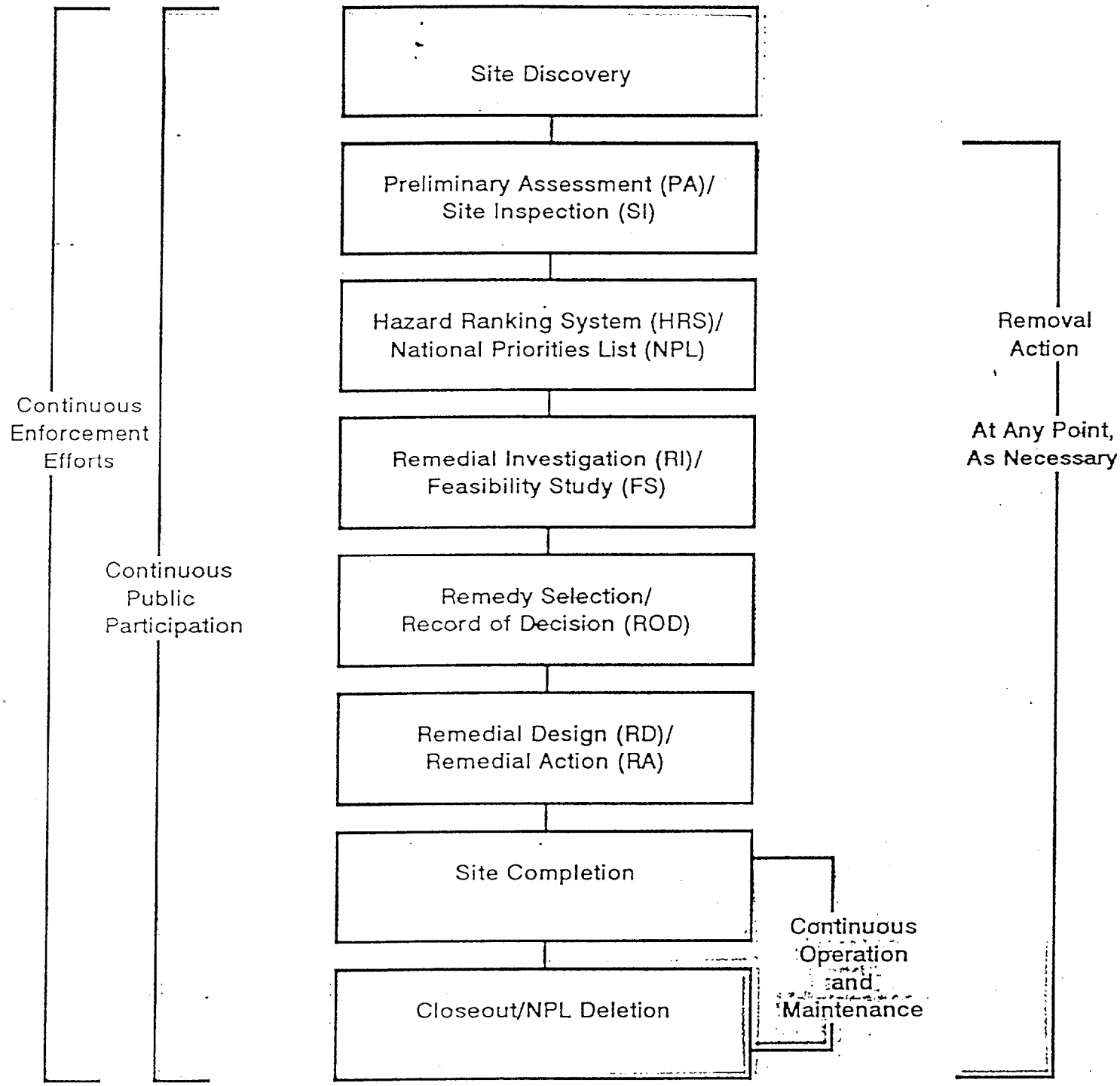
Response: Andy Stackpole indicated that it is not known if contamination exists as a result of the OBDA and if there is no risk, then the site should be left alone. He further emphasized that the OBDA acts as a dam between the Wetland and the Downstream/OBDA. Matt Cochran indicated that the impacts on ecological receptors must also be considered during removal activities.

Question: Harry Watson asked if the Thames River Biota has been analyzed for heavy metals?

Response: Matt Cochran indicated yes and provided a synopsis of the biota sampled and analyses performed with the assistance of Katherine Fogarty.

ATTACHMENT 1

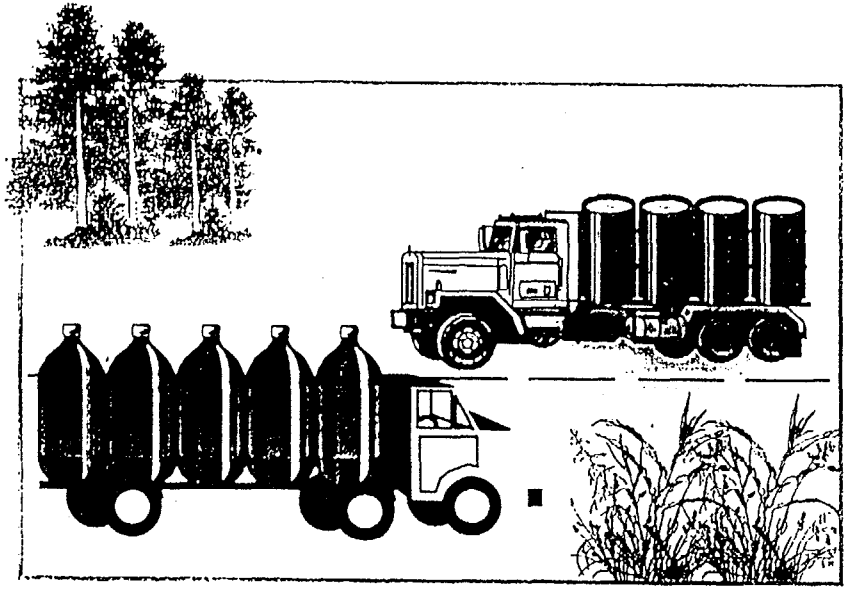
The Superfund Process



Early Actions

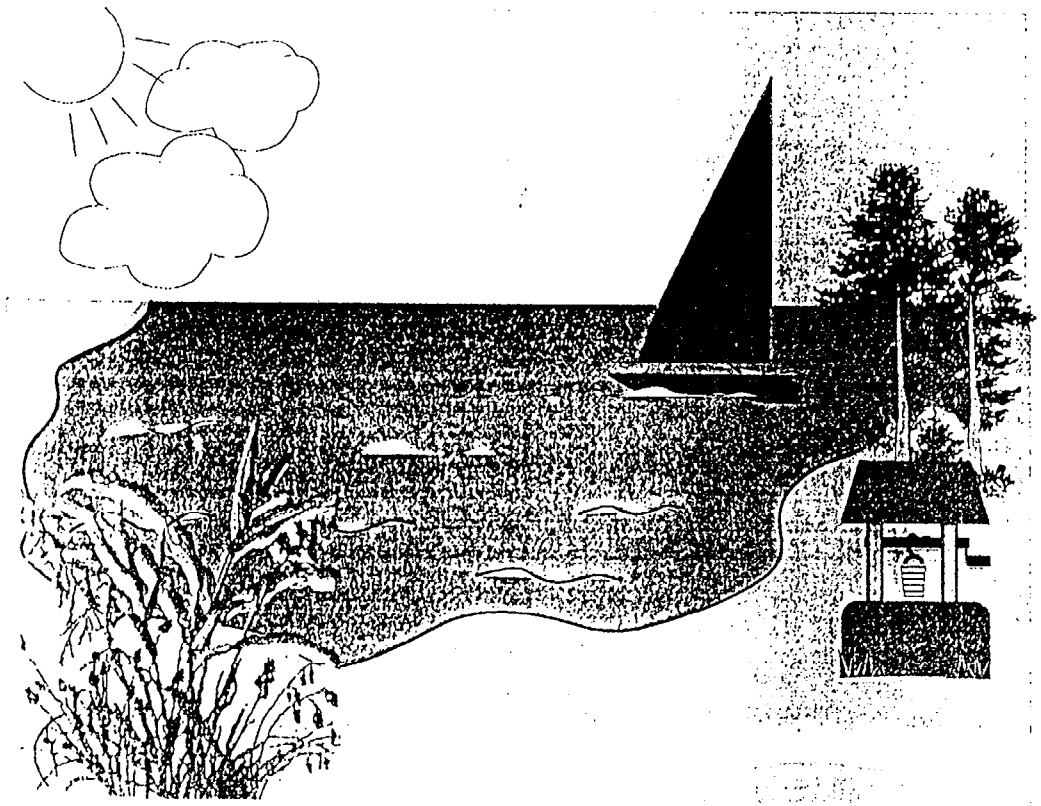
- Early Actions
  - Are used to address or prevent imminent threats
  - May take from a few days to years to complete
  - Usually cost less than $5 million

- Examples Of Early Actions
  - Remove leaking drums
  - Provide community with bottled water

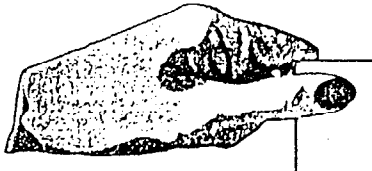


Hazard Ranking System

- Identifies Possible Risks At A Site
- Examines Four Pathways Of Exposure And Migration
  - Groundwater
  - Surface water
  - Soil
  - Air



National Priorities List

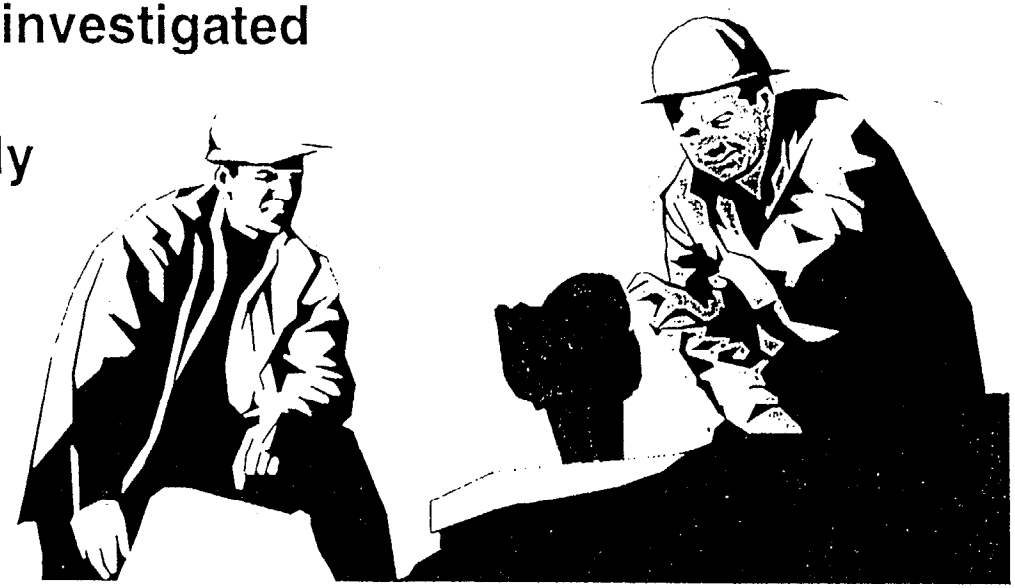


National Priorities List (NPL)

- ☑ Contains abandoned/inactive hazardous waste sites
- ☑ Sites must be studied further to determine cleanup action
- ☑ Public can comment on whether site should be placed on NPL

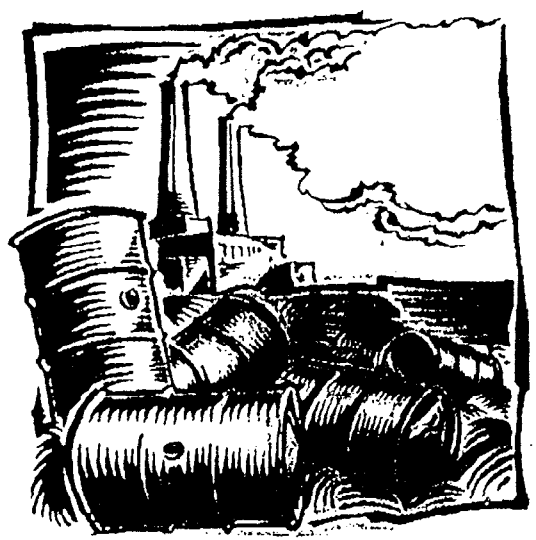
Conduct RI/FS

- Remedial Investigation (RI)
  - Extent of contamination is determined
- Risk Assessments
- Feasibility Study (FS)
  - Treatment options are investigated
- May Occur Simultaneously



Site Discovery

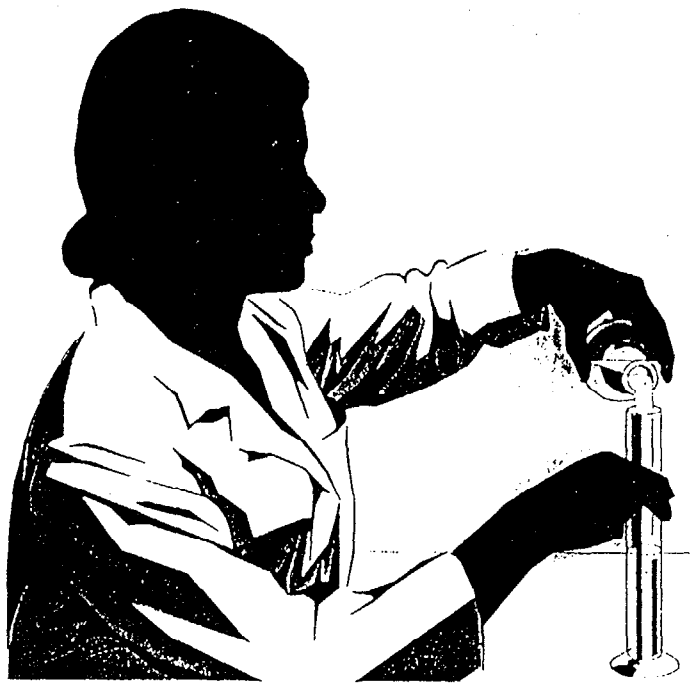
- Sites Can Be Discovered By:
  - Federal, State, and local agencies
  - EPA
  - You



- Call National Response Center (1-800-424-8802) And/Or Notify State And Local Authorities

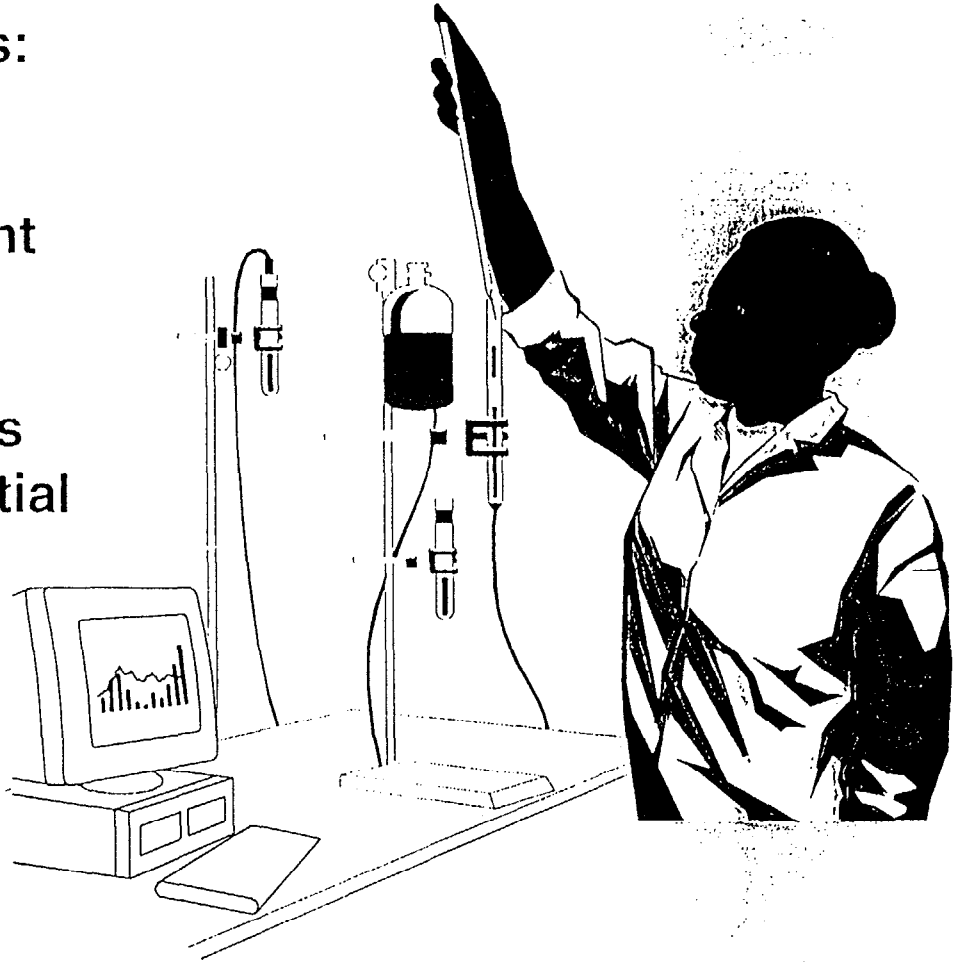
Gathering Information

- Preliminary Assessment And Site Inspection Provide Information On Nature And Extent Of Hazard
- Some Sampling May Be Done
- Action Is Taken Based On Results



Assessing Site Hazards

- Site Assessment Includes:
  - Site discovery
  - Preliminary assessment
  - Site inspection
  - Evaluate potential risks
  - Assess removal potential
  - Consider placing on National Priorities List



Nine Evaluation Criteria

- State acceptance
- Community acceptance

EPA's Proposed Remedy

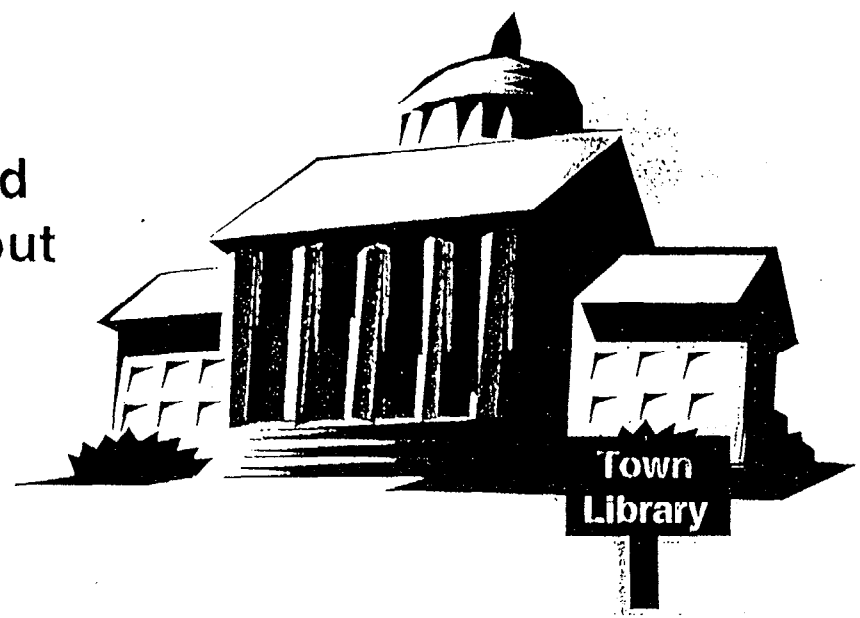
- Long-term effectiveness and permanence
- Reduction of toxicity, mobility, or volume
- Short-term effectiveness
- Implementability
- Cost

- Protection of human health and the environment
- Compliance with State and Federal requirements

Community Involvement

- Information About The Site And Community Involvement Activities Are Located In Information Repositories Near A Site

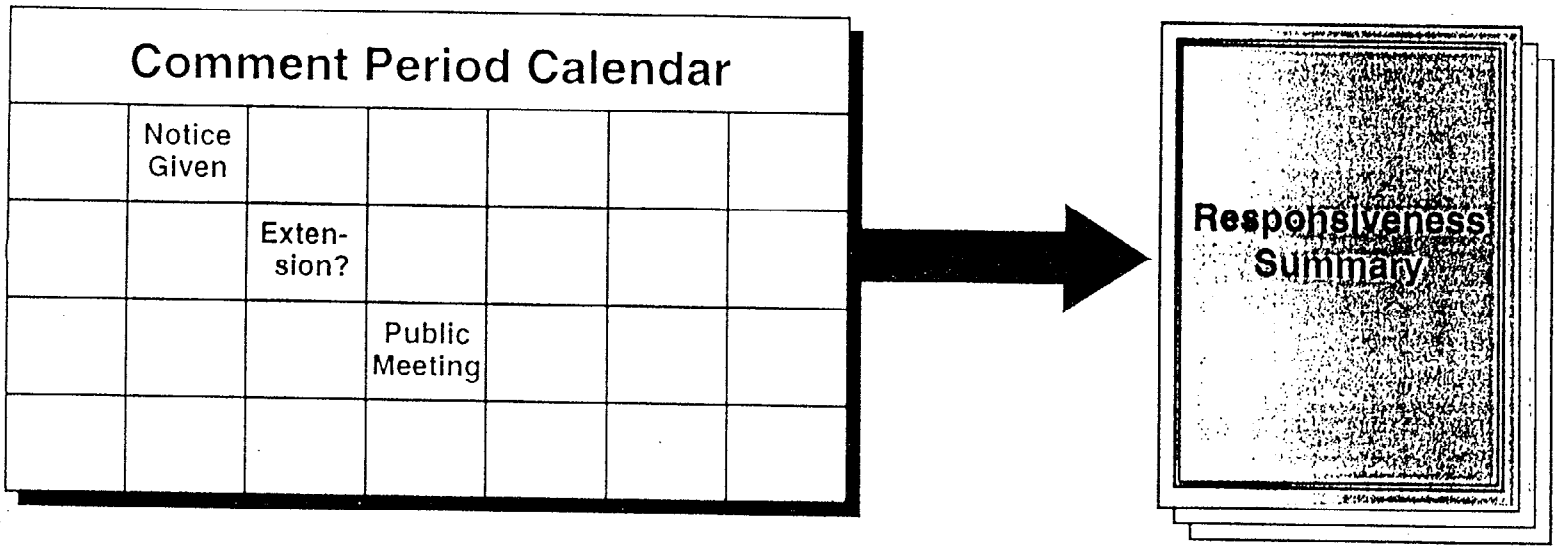
- The Administrative Record Contains Information About The Site And All Decision Documents



Cleanup Selection And Implementation

- Site Investigation, Cleanup Selection, And Implementation Are Complex And Time Consuming
- Much Information Is Needed To Select The Best Method Of Cleanup
- The Unique Circumstances Of Each Site Must Be Evaluated

Community Involvement



Community Involvement

- Community Working Groups (CWG)

- Technical Assistance Grants (TAGs)

For more information on the grant, or any other aspect of the EPA's involvement in the cleanup, contact:

Mike McGagh, TAG Program Manager
U.S. Environmental Protection Agency, Region I
JFK Federal Building (HPC-CAN7)
Boston, MA 02203-2211
(617) 223-5534

Kymberlee Keckler, Remedial Project Manager
U.S. Environmental Protection Agency, Region I
JFK Federal Building (HAN-CAN1)
Boston, MA 02203-2211
(617) 573-5777

Leo Kay, Community Relations Coordinator
U.S. Environmental Protection Agency, Region I
JFK Federal Building (RPS)
Boston, MA 02203-2211
(617) 565-34232

Community Involvement

Why Should You Become Involved?

Introduction

Congress created the Superfund program in 1980 primarily to provide for direct federal response for the cleanup of hazardous waste sites that threaten human health or the environment. The National Contingency Plan is the basic regulatory framework for Superfund and provides an organizational structure and procedures for preparing and responding to discharges and releases of hazardous substances, pollutants and contaminants.

There are currently about 1,300 Superfund sites in the United States, 92 of which are in New England. Superfund is unique in that it addresses contamination (or threatened contamination) to all media - surface water, soil, air, and groundwater.

Unlike private sites where the Environmental Protection Agency or private parties serve as the lead for the cleanup, the federal facility is the designated lead agency. The EPA serves as the "oversight authority" at military installations, ensuring that the Department of Defense adheres to state and federal requirements in investigating and cleaning up sites.

Some of the main differences between hazardous waste cleanups at private sites and those at federal facilities are:

- Department of Defense/Military Service is the lead agency instead of EPA

- EPA provides oversight

- The Superfund Trust Fund does not finance federal facility cleanups. The Defense Environmental Restoration Account funds the cleanup work at federal facilities.

- EPA does not search for Potentially Responsible Parties to recover costs for the cleanup since the federal facility has accepted responsibility for the site

- Federal facilities are composed of several discrete areas of contamination (commonly referred to as "operable units" or "areas of contamination") instead of one consolidated area

At federal facilities, EPA personnel:

- Assist and provide guidance on work plans and other technical documents submitted by the Department of Defense;

- Conduct "split samplings" to verify the accuracy

of field data;

- Must agree with proposals for cleanup plans;

- Oversee cleanup design and construction activities.

The working relationship among the Navy, EPA, and the Connecticut Department of Environmental Protection is outlined in a Federal Facility Agreement ("FFA") that establishes the cornerstone of EPA's federal facility enforcement program. The general purpose of the FFA is to establish a timetable and procedural framework for developing, implementing, and monitoring appropriate response actions under the Superfund program. The FFA also allows for enforcement actions, should they be necessary. The agreement also facilitates cooperation, exchange of information, and participation of all involved parties.

The EPA, the State and the Department of Defense work as a team to develop environmentally protective options that address hazardous waste sites on federal facilities. The Restoration Advisory Board builds on this concept to include community members as a part of this team as well.

The Process

The Superfund cleanup process is composed of numerous steps that ultimately lead to the cleanup of contaminated sites. The chart on the screen depicts the different stages each individual site goes through on its way to eventual cleanup. If at any time the site is determined to pose an immediate threat to human health and the environment, the typical Superfund process is shelved in favor of immediate action.

Removal Actions

- Removal Actions can be taken at any time within the process to remove or stabilize an imminent threat to human health or the environment. Removal actions are generally intended to reduce or eliminate imminent threats from contamination and are short-term actions. Environmental problems such as area-wide contamination of groundwater are not normally addressed, unless an imminent threat exists.

- Removal Actions may reduce the cost of longer-term cleanup by controlling migration of the hazardous substance or by eliminating the source of the additional contamination.

• The NSBNL is currently undertaking several removal actions to date, including Building 31, DRMO Yard, and the Spent Acid Storage and Disposal Area.

Site Discovery

• Identify places where a hazardous substance problem may exist.

• Many site discoveries result from information and reports from States, communities, local authorities, businesses and citizens.

Preliminary Assessment/Site Inspection

• Limited analysis (desk-top review)

• Review any available documents about the site

• Site visit and sample collection to define and further characterize the site's problems

Hazard Ranking System/National Priorities List

• Conduct a preliminary evaluation to assess the degree of contamination

• The Hazard Ranking System is a numerically based scoring system that uses information from the site inspection. The score is based on: 1) the likelihood that a site has released (or has the potential to release) contaminants to the environment, 2) the characteristics of the substance (*e.g.*, toxicity and quantity), and 3) the people or sensitive environments affected by the release.

• Site may be listed on the National Priorities List in three ways: 1), Scoring 28.5 on the Hazard Ranking System 2) Nomination by the State, or 3) Nomination by the Agency for Toxic Substances and Disease Registry

• While the NSBNL has many sites that are currently being evaluated, the base was originally listed on the NPL because of contamination at the Area A Landfill, the DRMO yard, and the Over Bank Disposal Area. After evaluating contamination in surface water, groundwater, and air, the NSBNL scored 36.53 on the HRS. NSBNL was formally listed on the NPL on

August 30, 1990.

Remedial Investigation/Feasibility Study

- The Remedial Investigation emphasizes data collection and site characterization. During the Remedial Investigation the nature and extent of the contamination at the site is determined.

- The Feasibility Study focuses on development of specific remedies based on general response actions identified in the Remedial Investigation to address contamination problems. The FS evaluates a range of alternatives, including the "No Action" alternative.

- Most of the sites on the NSBNL are in the RI/FS phase. Mark Evans will give more details about where different sites on the base are in the process.

Remedy Selection/Record of Decision

- A remedy is usually proposed during the feasibility study process and is presented to the public for comment in a Proposed Plan. There is a 30 day comment period on the Proposed Plan.

• The Department of Defense shall make the Administrative Record available to the public for review. The Administrative Record includes all documents and information contributing to the final remedy selection.

• If EPA and the Department of Defense disagree on the proposed remedy, the ultimate decision on remedy selection resides with EPA.

• A Record of Decision is a decision document indicating that the remedy has been selected. A Record of Decision is developed after the comments on the Proposed Plan are received and evaluated. A "Responsiveness Summary" is included in the ROD that responds to comments received on the Proposed Plan.

• A Record of Decision is planned for the Area A Landfill for June 30, 1995.

Remedial Design/Remedial Action

• Remedial Design is the preparation of the plans and specifications to accomplish the remedial action.

• The Remedial Action is the implementation or

construction of the remedy itself. Significant on-site activity related to the remedy must begin within 15 months from the date of ROD signature.

Site Completion

- Once the remedy implemented is operational and functional and meets its designated environmental, technical, legal and institutional requirements, it will be considered a site completion. Site completions at federal facilities can occur for individual operable units, but does not occur for the base until all of the operable units are completed.

- Once the remedial actions are completed site operation and maintenance activities are conducted, as needed, to maintain the effectiveness of the remedy and to ensure that no new threat to human health or the environment arises.

Closeout/NPL Deletion

- When planning for a site closeout, EPA must ensure that all waste is properly disposed, that all equipment is decontaminated and demobilized, that temporarily

relocated citizens are returned to their homes, and that response related damages are remedied. In other words, the site is restored.

Public Participation

Finally, one of the most important components of the Superfund law involves the concept of public participation. The EPA will work with the Department of Defense, the State and members of the community to ensure that members of the community have input to the decision-making process regarding cleanup at the installation. The RAB serves as an integral aspect of this program.

The Navy has developed a Community Relations Plan for the NSBNL that briefly describes the base and the Superfund process. The Community Relations Plan for the NSBNL is one of the better plans submitted to EPA.

In addition, the EPA offers up to $50,000 initially for a technical assistance grants ("TAG") to any groups wishing to hire an independent technical advisor to follow progress at the site. For more information on the grant, or any other aspect of the EPA's involvement

in the cleanup, contact:

Mike McGagh, TAG Program Manager
U.S. Environmental Protection Agency, Region I
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ATTACHMENT 2

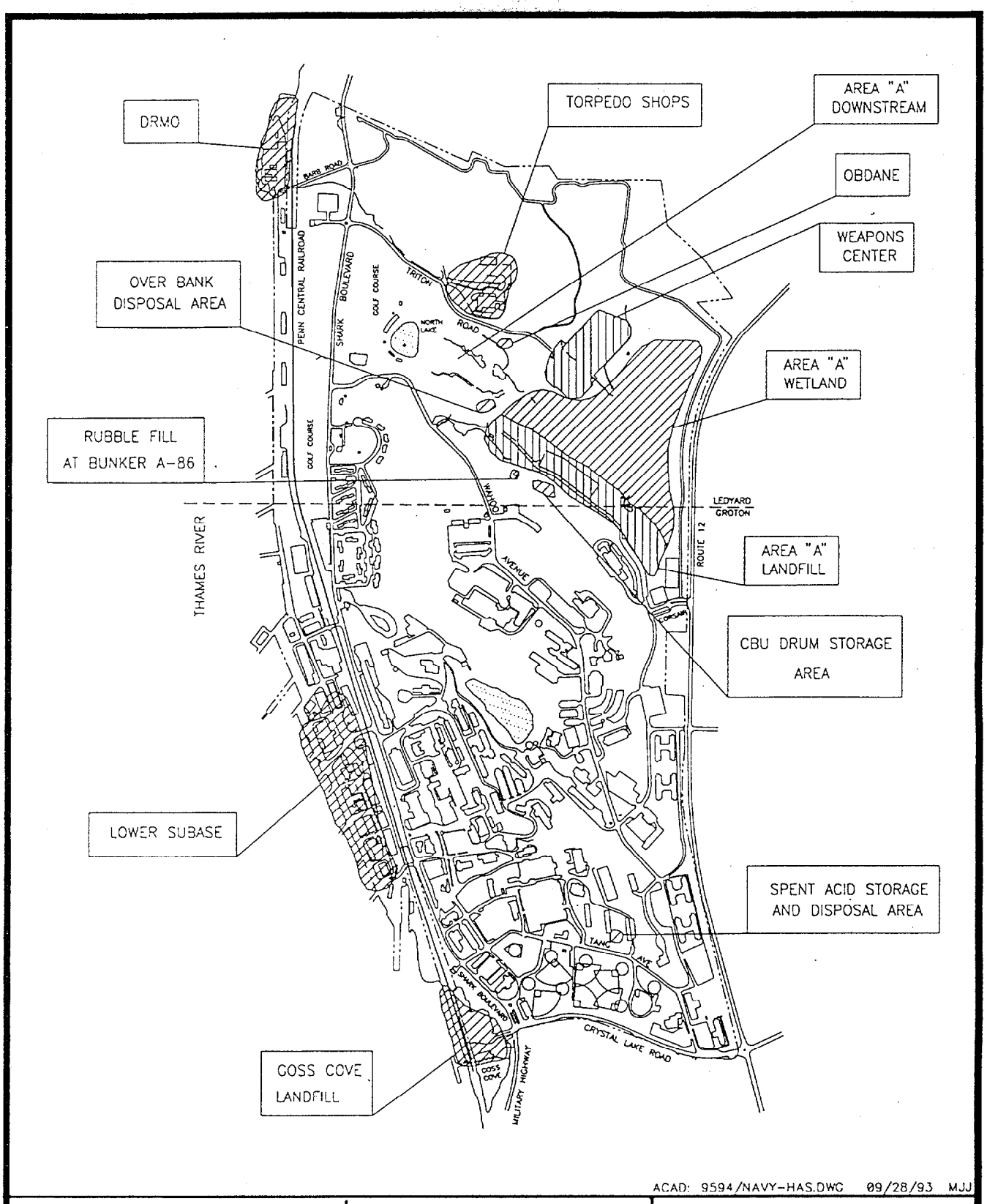
RESTORATION ADVISORY BOARD MEETING

INSTALLATION RESTORATION PROGRAM

NAVAL SUBMARINE BASE - NEW LONDON
GROTON, CONNECTICUT

NOVEMBER 9, 1994

Halliburton NUS
CORPORATION



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INSTALLATION RESTORATION STUDY
NAVAL SUBMARINE BASE - NEW LONDON
GROTON, CT

SOURCE: Naval Submarine Base
Existing Conditions
April 1985
Loureiro Engineering Associates

N

0 600 1200
GRAPHIC SCALE IN FEET

FIGURE 3
INSTALLATION RESTORATION
STUDY SITES

ATLANTIC ENVIRONMENTAL SERVICES, INC.

PHASE II RI SITES

1) GOSS COVE LANDFILL

2) SPENT ACID STORAGE AND DISPOSAL AREA

3) LOWER SUBASE

4) CBU DRUM STORAGE AREA

5) RUBBLE FILL AT BUNKER A-86

6) AREA A LANDFILL

7) AREA A WETLAND

8) AREA A DOWNSTREAM / OBDA

9) AREA A WEAPONS CENTER

10) OBDANE

11) TORPEDO SHOPS

12) DRMO

13) THAMES RIVER

GOSS COVE LANDFILL

LANDFILL FROM 1946 - 1957

ASH, RUBBLE, GAS CYLINDERS

NAUTILUS MUSEUM BUILT IN 1985

SPENT ACID STORAGE AND DISPOSAL AREA

12' X 4' X 4' UST USED FOR BATTERY ACID STORAGE

NO LONGER USED

LOWER SUBASE

AREA OF ORIGINAL SUBASE

ORIGINALLY CONSTRUCTED IN 1867

EXPANSION IN EARLY 1900s PRIOR TO WWI AND WWII

SUMPS, LINES, AND USTS CONTAINING FUELS

SPILL AREAS IN AND AROUND BUILDINGS

CBU DRUM STORAGE AREA

15' X 30' AREA

26 DRUMS FOUND IN 1982, 2 IN 1988

DRUMS CONTAINED WASTE OIL AND PAINT MATERIALS

ALL DRUMS REMOVED

RUBBLE FILL AT BUNKER A-86

25' X 60' AREA

FOUND IN 1982

DISCARDED CONSTRUCTION MATERIALS OVER AN EMBANKMENT (CONCRETE, ASPHALT, TAR BUCKETS, WOOD, GRAVEL)

AREA A LANDFILL

7 ACRE AREA STARTED AFTER 1957 - 1973

ASH DISPOSED UNTIL 1963

UNBURNED REFUSE UNTIL 1973

SPENT ACID AND PETROLEUM COMPOUNDS

CONCRETE PAD AFTER 1973 FOR INDUSTRIAL WASTE STORAGE

42 DRUMS, 87 TRANSFORMERS, AND 60 TO 80 SWITCHES FOUND IN 1982 (ALL MATERIALS REMOVED)

AREA A WETLAND

30 ACRE AREA

THAMES RIVER DREDGE SPOILS PUMPED IN LATE 1950s

PESTICIDE BRICKS PLACED IN WETLAND FOR MOSQUITO CONTROL

AREA A DOWNSTREAM / OBDA

DRAINS THE AREA A WETLAND AND LANDFILL

OBDA CONTAINS SCRAP LUMBER AND FUEL TANKS

AREA A WEAPONS CENTER

BUILDING 524 AND BUNKERS FOR WEAPONS STORAGE

BUNKERS FIRST PRESENT IN 1969

BUILDING 524 AND ADDITIONAL BUNKERS BUILT IN 1991

SMALL QUANTITIES (1-5 GALLONS) OF CLEANING AND LUBRICATING COMPOUNDS, PAINTS, AND ADHESIVES

OBDANE

FIBER DRUMS DUMPED OVER AN EMBANKMENT

DISCOVERED IN 1982

TORPEDO SHOPS

TORPEDO OVERHAUL AND ASSEMBLY FACILITY

BUILDING 325 BUILT IN 1955

BUILDING 450 BUILT IN 1974

FUELS, SOLVENTS, AND PETROLEUM DISCHARGED TO SEPTIC SYSTEM UNTIL 1983

USTS LOCATED IN AREA

SANITARY SEWERS INSTALLED IN 1983

DRMO

LANDFILL AND BURNING GROUND FROM 1950 TO 1969

CONSTRUCTION MATERIALS, SCRAP, AND NON - SALVAGEABLE WASTE

PRESENTLY USED FOR STORAGE OF ITEMS FOR SALE

BATTERY ACID HANDLING FACILITY

THAMES RIVER

DISCHARGE POINT FOR SURFACE WATER RUNOFF AND GROUNDWATER DISCHARGE FROM SUBASE NLON

ATTACHMENT 3

NAVAL SUBMARINE BASE - NEW LONDON
REMEDIAL ACTION PROJECT STATUS

AREA "A" LANDFILL

- INTERIM REMEDIAL ACTION (CAP)
- REVISED DRAFT FEASIBILITY STUDY COMPLETE
- DRAFT FINAL FEASIBILITY STUDY - JANUARY 1995
- DRAFT PROPOSED PLAN - DECEMBER 31, 1994
- DRAFT ROD - MARCH 31, 1995
- CONSTRUCTION AWARD - FY 1995

NAVAL SUBMARINE BASE - NEW LONDON
REMOVAL ACTION PROJECT STATUS

DRMO

- TIME-CRITICAL REMOVAL ACTION
  (HOT SPOT REMOVAL AND CAP)

- CONSTRUCTION BEGAN IN OCTOBER 1994

- SOIL EXCAVATION COMPLETE BY 16 NOVEMBER 1994

- BEGIN INSTALLING CAP - 28 NOVEMBER 1994

NAVAL SUBMARINE BASE - NEW LONDON
REMOVAL ACTION PROJECT STATUS

SPENT ACID STORAGE AND DISPOSAL AREA

- TIME CRITICAL REMOVAL ACTION (SOIL EXCAVATION AND OFF-SITE DISPOSAL)
- CONSTRUCTION WILL BEGIN FOLLOWING THE EXCAVATION PHASE OF THE DRMO REMOVAL ACTION
- ACTION MEMORANDUM WAS PREPARED FOR BOTH THE DRMO AND SPENT ACID REMOVAL ACTIONS

NAVAL SUBMARINE BASE - NEW LONDON
PROJECT STATUS

PIER 33\BERTH 16 SITES

- DRAFT SITE INSPECTION REPORT COMPLETE
- FINAL SITE INSPECTION - DECEMBER 1994
- SI RECOMMENDED MOVING INTO REMEDIAL INVESTIGATION PHASE
- FFA SCHEDULE
  DRAFT RI REPORT - MARCH 1, 1996
- RI WORK PLAN WILL BE SUBMITTED IN FY 1995

ATTACHMENT 4

BUILDING 31 LEAD REMEDIATION SUCCESS STORY

- USED AS A HAZARDOUS MATERIAL STORAGE BUILDING
- SOIL UNDERNEATH THE FLOOR WAS COLLECTED AND ANALYZED . REVEALED ELEVATED LEAD LEVELS
- ABBREVIATED FIELD SAMPLING PLAN - FEBRUARY 1993
- TOTAL LEAD CONCENTRATIONS IN SOIL UP TO 16,900 mg/kg
- ACTION MEMORANDUM - MAY 1993
  - ESTABLISHED CLEAN-UP LEVELS OF 500 mg/kg
- HALLIBURTON NUS COMPLETED DESIGN
- CONSTRUCTION CONTRACT AWARDED - 30 SEPTEMBER 1993 TO NATIONAL ENVIRONMENTAL SERVICES CORPORATION , BLOOMINGTON, INDIANA
- FORRESTER ENVIRONMENTAL SERVICES, INC. PERFORMED TREATABILITY STUDY

BUILDING 31 (CONT.)

- TREATABILITY STUDY PROBLEMS
  - WHEN STABILIZED MATERIAL WAS EXPOSED TO WET/DRY CYCLES OF SALINE SOLUTION IT WOULD NOT PASS TCLP TEST
  - HAD TO DO TREATABILITY STUDY OVER USING DIFFERENT MIXTURE
    - » 1 % MONO AMMONIUM PHOSPHATE
    - » 5 % PORTLAND CEMENT (TYPE II)
- COMPLETED TIME CRITICAL REMOVAL ACTION
  - FEBRUARY 1994 TO JUNE 1994
- STABILIZATION/SOLIDIFICATION
  - 1072 CUBIC YARDS OF SOIL INSIDE BLDG 31
  - 202 TONS OF SOIL/ROCK OUTSIDE OF BUILDING WAS SHIPPED TO AN APPROVED LANDFILL
- THIRD ROUND ANALYTICAL RESULTS OF GROUNDWATER SHOW THE QUALITY OF GROUNDWATER UNDER BUILDING 31 IS ESSENTIALLY THE SAME AS LOCAL BACKGROUND.

BUILDING 31 (CONT.)

  - USED LOW FLOW PURGING AND SAMPLING DURING THE THIRD ROUND OF SAMPLING
  - TOTAL LEAD AND SOLUBLE LEAD WERE NON-DETECTABLE
  - STABILIZED SOILS WERE LESS THAN 5 mg/L FOR TCLP LEAD. MOST WERE LESS THAN 1 mg/L
- CONRETE CAP (FLOOR) IS IN PLACE.
- POST REMOVAL ACTION REPORT - JULY 1994
- PROCEEDING WITH RENOVATION OF BUILDING 31