

SRSNE Site Group

Remedial Design Work Plan Attachment I

Soil Investigation Plan

Solvents Recovery Service of New England, Inc. (SRSNE) Superfund Site Southington, Connecticut

April 2009

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Solvents Recovery Service of New England, Inc. (SRSNE) Superfund Site Southington, Connecticut

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Executive Summary

This *Soil Investigation Plan* has been prepared to address certain requirements of the Statement of Work (SOW), for the Remedial Design/Remedial Action (RD/RA) activities at the Solvents Recovery Service of New England, Inc. (SRSNE) Superfund Site in Southington, Connecticut. Specifically, Section V.C.1.i of the SOW requires soil investigations to (1) reassess the extent of the area to be capped following implementation of the insitu thermal remediation (ISTR) component of the remedy, and (2) determine background concentrations for dioxin in soil. Although not a specific requirement of the SOW, this *Soil Investigation Plan* also addresses other anticipated soil sampling to confirm or modify (relative to the limits reflected in the Record of Decision [ROD]) the limits of soil removal for five discrete areas on the Cianci Property where soil excavation is proposed as part of the remedial action for the Site.

This Soil Investigation Plan discusses soil sampling for the following purposes:

- To determine background dioxin concentrations four samples are to be collected in consideration of the presumed primary source of dioxins at the Site, topography, primary wind direction, and accessibility.
- To define capping limits approximately 28 samples (collected in two phases) are to be collected to define the extent of the former Operations Area and railroad right-of-way subject to capping. Additional samples may be collected as needed to achieve delineation for this area.
- To delineate removal areas on the Cianci Property approximately 22 samples are to be collected to confirm or modify the horizontal extent of removal in each of the five targeted areas of soil removal. Additional samples will be collected as needed to achieve delineation for each area.

Results of soil sampling to assess background dioxin concentrations, the first phase of cap delineation samples, and delineation of Cianci Property excavation areas are anticipated to be summarized and reported in the Pre-Design Investigation Summary Report. Samples collected following implementation of the in-situ thermal remediation activities (i.e., the second phase of cap delineation samples) will be presented in the conceptual and/or detailed design packages for the capping component of the remedy.

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1. Introduction

1.1 Purpose and Scope

This document has been prepared on behalf of the SRSNE Site Group, an unincorporated association of Settling Defendants to a Consent Decree (CD) and Statement of Work (SOW) for the Remedial Design/Remedial Action (RD/RA) at the Solvents Recovery Service of New England, Inc. (SRSNE) Superfund Site in Southington, Connecticut (Site). The CD was lodged on October 30, 2008 with the United States District Court for the District of Connecticut in connection with Civil Actions No. 3:08cv1509 (SRU) and No. 3:08cv1504 (WWE). The CD was entered by the Court on March 26, 2009.

This *Soil Investigation Plan* has been prepared to address Section V.C.1.i of the SOW, which requires soil investigations to (1) re-assess the extent of the area to be capped following implementation of the in-situ thermal remediation (ISTR) component of the remedy, and (2) determine background concentrations for dioxin¹ in soil. Although not a specific requirement of the SOW, this *Soil Investigation Plan* also addresses other anticipated soil sampling to confirm or modify (relative to the limits reflected in the Record of Decision [ROD]) the limits of soil removal for five discrete areas on the Cianci Property where soil excavation is proposed as part of the remedial action for the Site. The scope of the planned remedial action is described in Section 2.5.2 of the *Remedial Design Work Plan* (RDWP) to which this document is attached.

Section V.C.1.i of the SOW also requires this plan to reassess changes to cleanup levels or guidance documents related to the site-related constituents being investigated. Such reassessment was performed as part of the RDWP development and is provided in Section 2.5.3 of the RDWP. The reassessment concluded that none of the soil-based cleanup levels specified in the ROD and SOW have been modified since those documents were prepared. Once this plan is implemented, the potential for changes to cleanup levels will again be reassessed as part of the evaluation and reporting of the data.

¹ The term "dioxin" is used herein for consistency with the SOW; it refers to the family of organic compounds known as polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (PCDDs/PCDFs).

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1.2 Document Organization

The remainder of the report is organized into six sections, each of which is identified and briefly described as follows:

- Section 2 Performance Standards: provides a summary of the Performance Standards pertinent to the various sampling activities described herein.
- Section 3 Investigation of Background Dioxin Concentrations: describes the planned sampling and analysis approach for determining background dioxin concentrations.
- Section 4 Soil Sampling to Define Capping Limits: describes a twopart soil sampling approach intended to confirm or modify the limits of the planned Resource Conservation and Recovery Act (RCRA) cap to be constructed in the former Operations Area following implementation of the ISTR component of the remedy.
- Section 5 Delineation of Removal Areas on the Cianci Property: describes the planned soil sampling and analysis approach to further assess and delineate the extent of soils exceeding applicable cleanup levels in the vicinity of five targeted areas of the Cianci Property where soil excavation is identified as a component of the remedial approach in the ROD.
- Section 6 Schedule and Reporting: identifies the anticipated schedule under which the various investigations will be performed, and the means by which the results will be reported to the United States Environmental Protection Agency (USEPA).
- Section 7 References: lists the references that are cited throughout the text of this plan.

In addition, reference is made to the Sampling and Analysis Plan (SAP), which is provided as Attachments B and C of the *Remedial Design Project Operations Plan* (RD POP). The SAP describes procedures applicable to the soil sampling activities described in this plan. This includes summaries of sample collection methods, sample processing, equipment cleaning, laboratory analysis, data management, and other procedures applicable to sampling activities at the Site.

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2. Performance Standards

Performance Standards associated with the various remedial components for the SRSNE Site are presented in Section IV of the SOW and, pertinent to this plan, soil-related Performance Standards are further discussed in Section 2.5.3 of the RDWP. Specific to the soil and wetland soil areas subject to investigation under this work plan, applicable Performance Standards were specified in Section IV.A.2 of the SOW and further evaluated in Section 2.5.3 of the RDWP. These cleanup levels apply to soil beyond the extent of the planned cap in the former Operations Area, along the railroad right-of-way, and in soil and wetland soil on the Cianci Property at the completion of planned excavation of discrete soil areas. These cleanup levels are summarized in Table L-2 of the ROD and the SOW; a copy of Table L-2 is also provided in Appendix 1 of the RDWP.

With regard to the soil cleanup levels, note that the cleanup level for dioxins will be based on evaluation of the Toxic Equivalence Quotient (TEQ) for 2,3,7,8-tetrachorodibenzon-p-dioxin (2,3,7,8-TCDD). This specific congener is considered to be the most toxic form among the 210 dioxin and furan congeners. Sixteen other dioxin and furan congeners that include chlorine atoms in the 2, 3, 7, and 8-substituted positions have also been assigned specific Toxic Equivalency Factors (TEFs). The TEFs indicate the degree of toxicity relative to 2,3,7,8-TCDD, which is given a TEF value of 1. To calculate the total TCDD TEQ of a dioxin mixture in a sample, the concentration of each of the 17 dioxin and furan congeners for which TEFs are assigned are multiplied by their respective TEF and then summed to determine the 2,3,7,8-TCDD TEQ for a given sample. The TEQ will be calculated based on World Health Organization (WHO) 2005 TEF values, or any updates thereto that may be published prior to remedy implementation.

Note also that the site-specific dioxin-related cleanup level is yet to be determined. Specifically, Table L-2 of the ROD and SOW indicates that the cleanup level for dioxin will be the lesser of the 1 part per billion 2,3,7,8-TCDD TEQ (per USEPA'S OSWER Directive 9200.4-26, April 1998) or the background value, or an alternate value that is consistent with the Connecticut Remediation Standard Regulations (but not lower than background). Accordingly, the background sampling for dioxin described in this *Soil Investigation Plan* will be directly related to establishing the soil cleanup level for the Site.

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The soil cleanup levels specified in Table L-2 of the ROD were based primarily on the standards established in the Connecticut Department of Environmental Protection (CTDEP) Remediation Standard Regulations (RSRs). Based on the groundwater classification at the Site (GA), the applicable criteria for soil are the Residential Direct Exposure Criteria (RDEC) and the Pollutant Mobility Criteria (PMC). A brief summary of each is provided below:

- RDEC applies to soil within 15 feet of the ground surface, regardless of the depth to the water table. Provided that an Environmental Land Use Restriction (ELUR) is placed on the property (a planned component of the ROD-specified remedial approach for this Site), the RDEC do not apply to "inaccessible soil", as defined in 22a-133k-1(a)(28) of the RSRs. This includes soil more than four feet below the ground surface; more than two feet below a three-inch minimum paved surface; beneath an existing building or beneath any other permanent structure approved by the Commissioner of the CTDEP.
- **PMC** applies to soil above the seasonal low water table, per 22a-133k-2(c)(1)(A). The water table at the Site varies between 0 and 10 feet; therefore, the seasonal low water table will need to be evaluated at specific locations and depth intervals when evaluating the applicability of the PMC-based criteria.

Additional discussion of the applicability of the soil cleanup levels is provided in Section 2.5.3 of the RDWP.

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3. Investigation of Background Dioxin Concentrations

As indicated above, soil sampling is required to assess the background concentrations of dioxin because background concentrations have a bearing on the soil cleanup levels for this constituent group. To address this requirement, samples will be collected from four locations shown on attached Figure I-1. These locations were identified in consideration of the presumed primary source of dioxins at the Site (i.e., the former open pit incinerator in the southeast corner of the former Operations Area; Figure I-1), topography, primary wind direction, and accessibility. Specific factors associated with selection of the individual samples are summarized as follows:

Sample Location	Rationale
BDS-01 through -03	Topographically upgradient of the former Operations Area and upwind ² relative to the former open pit incinerator
BDS-04	Accessible location for sampling that is not hydraulically downgradient of the former Operations Area and is side- gradient relative to primary wind direction.

At each location, samples will be collected from the 0- to 1-foot depth increment and analyzed for dioxins and furans using SW-846 Method 8290. The resulting data will be used to calculate a 2,3,7,8-TCDD TEQ using the WHO (2005) TEFs. For the purposes of calculating the TEQ, non-detect congeners will be assigned a value of one-half the detection limit. Specific sampling and analytical methods are described in the *Sampling and Analysis Plan*, which is provided as Attachments B and C of the RD POP.

Because calculated TEQ values are likely to vary among the multiple background samples, a representative "background" concentration will be developed and proposed based on evaluation of the analytical data. The specific statistical approach(es) that may be employed will depend on the nature and distribution of the dataset and will consider applicable CTDEP guidance and regulation regarding background sampling.

² "Upwind is relative to the primary average annual wind direction for the Southington, Connecticut area, which is from the west-southwest based on data from nearby weather stations reported at Weather Underground (<u>www.wunderground.com</u>).

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4. Soil Sampling to Define Capping Limits

Surface capping was a component of the selected remedial approach for portions of the former Operations Area and railroad right-of-way. The estimated extent of capping in these areas is depicted on Figure 8 in the ROD and shown on the attached Figure I-2. Consistent with Sections IV.A.2 and V.C.1.i, the extent of the cap is subject to further evaluation to meet the SOW-specified Performance Standards for soil. Accordingly, soil sampling will be performed for the purpose of defining the extent of the former Operations Area and railroad right-of-way subject to capping.

Soil sampling to further define the cap limits will be performed using a twophased approach. The first phase will be performed as part of initial predesign investigations (i.e., following USEPA approval of the RDWP), and is intended to provide an initial assessment of the presence and extent of dioxin at and near the proposed in the cap limits in the former Operations Area. This focused initial assessment of dioxin concentrations is proposed due to the limited available dataset for dioxin in soils, the extremely low cleanup levels associated with dioxins (i.e., potentially 1 part per billion [ppb] or lower), the recalcitrance of dioxins relative to other site-related organics, and the potential for airborne distribution as a result of the former operation of the open pit incinerator. Considering these factors, this first phase of sampling is intended to assess the extent to which the presence of dioxins may substantially affect the determination of cap limits. Conducting this assessment early in the remedial design process will allow for further evaluation of remedial design options in the event that dioxin concentrations above the cleanup goals are present substantially beyond the preliminary cap limits indicated in the ROD.

The initial sampling phase includes collection of 6 surface soil samples (0- to 1-foot deep) for analysis of dioxins and furans using Method 8290. As shown on Figure I-2, the majority of the samples will be collected from the southern portion of the former operations area and in the primary downwind direction from the former open-pit incinerator. These samples will likely be collected at the same time as the background dioxin samples (Section 3) and prior to any surface grading or site preparation activities associated with the ISTR component of the remedy.

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Based on the results of the initial sampling and evaluation of the results relative to the findings of the background sampling, additional samples may be collected as part of the first phase of cap delineation sampling to further delineate the presence and extent of dioxins in soil. The additional sample locations would be established by stepping outward from the initial sample locations with the objective of delineating the extent of dioxin in surface soils at levels exceeding the cleanup level.

The second phase of cap delineation sampling will be conducted following implementation of the ISTR component of the remedy. This phase will specifically address the requirement of Section V.C.1.i of the SOW, which requires soil sampling after implementation of the in-situ thermal component to re-assess the cap limits. Soil sampling after ISTR implementation will provide data representative of the conditions at the time, including site modifications that may occur as a result of grading, operation, and staging of support equipment associated with ISTR implementation.

It is anticipated that the second phase of cap delineation sampling will include sampling at approximately 22 locations around the perimeter of the proposed cap limit. Figure I-2 identifies target locations for this sampling that reflect the preliminary cap limits indicated in the ROD. The actual locations are subject to change based on several factors, including:

- Modifications to the Site made for the purposes of implementing the ISTR component, including grading, fill, and drainage modifications described in the *Pre-ISTR Preparation Plan* (PIPP; Attachment M to the RDWP).
- Analytical data for samples to be collected as part of the PIPP, and any resulting modifications to the scope of work made as a result of those data.
- Grading and modifications of the former Operations Area to provide sufficient access, staging, and support for the ISTR implementation.
- The findings of the initial dioxin investigations to be performed as the initial phase of the cap delineation sampling, including any further sampling that may be necessary to determine the extent of dioxin in soils.

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The second phase of delineation samples will be collected from the 0- to 1foot depth interval and analyzed for dioxins. Similar to the first phase of this approach, additional samples may be warranted to further refine the final cap limits for the purposes of detailed cap design. To the extent that such they are available, other data generated by remedial design activities (e.g., soil sampling proposed as part of the PIPP) will be used to support the cap delineation.

In the course of sampling to delineate the extent of cap, detections of constituents at concentrations exceeding the Performance Standards beyond the proposed cap limits does not represent an automatic trigger for extending the cap limits. Depending on the nature and extent of the exceedance, it may be more appropriate to excavate limited areas of soils exceeding the cleanup levels and consolidate those soils within the cap limits. This would be particularly applicable in areas where only shallow/surficial soils exceed the cleanup levels. The applicability of cap extension versus consolidation of outlying soils beneath the cap will be made as part of the cap design in consideration of the available data at that time.

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5. Pre-Design Sampling of Cianci Property Removal Areas

The remedial approach for the Site includes removal of soils from five discrete areas on the Cianci Property. The purpose of removal in these areas is to address soils in the vicinity of prior sample locations where concentrations of one or more constituents exceeded the cleanup levels for soil and wetland soil indicated in Table L-2 of the ROD. The targeted removal areas are shown on Figure 7 from the ROD. The estimated removal limits for each area were drawn to encompass one or more sample points that exceed the cleanup levels, but were not necessarily bounded by adjacent sample locations that did not exceed the cleanup levels. Accordingly, pre-design sampling is proposed in these areas as a basis for confirming or modifying the horizontal extent of removal in each of the five targeted areas of soil removal on the Cianci Property. Vertical delineation will be achieved during excavation, either through bottom confirmatory samples or the depth-related applicability of the PMC and/or RDEC, as discussed in the *Post-Excavation Confirmatory Sampling Plan* (Attachment G to the RDWP).

For each of the five targeted removal areas, Table I-1 summarizes the sample location(s), depth interval(s), and constituents that exceeded cleanup goals and, therefore, triggered the planned soil removal activities for that area. The sample locations and preliminary removal limits (based on the ROD) are also shown on Figure I-3. Considering the nature of the original exceedance, Table I-1 and Figure I-3 also indicate the locations of and rationale for proposed delineation samples around each planned excavation area. Specifically, Table I-1 indicates the proposed delineation sample locations, depths, and target analytes. Note that, in each case, the constituents targeted for analysis are those that exceeded the cleanup levels in the original sample(s) around which each removal area was established.

For those areas where excavation is to be performed based on an exceedance of PMC-based cleanup levels, Table I-1 also indicates the estimated depth at which the seasonal low water table is expected to occur. Based on existing data, this is applicable to two of the five Cianci Property excavation areas (Excavation Areas 1 and 3). These estimates were made based on previous water level measurements in nearby monitoring wells (i.e., MWD-601 and CPZ-10 for Excavation Area #1 and MWL-309 for Excavation Area #3). In both cases, the depth to the seasonal low water level is greater than the depth to which delineation samples will be collected. As a result, the depth to seasonal low water level is not expected to affect the scope of the delineation sampling.

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As shown on Figure I-3, the preliminary sample locations in each removal area encompass the soil sample that exceeded one or more cleanup levels. For excavation areas that surround a single prior sample location that exceeds cleanup levels (i.e., Excavation Areas 1 through 4), four pre-design sample locations surround the prior sample location at a distance of approximately 20 feet from the prior location. For Excavation Area 5, which encompasses several prior sample locations, six pre-design sample locations surround the group of prior samples. In general, the proposed pre-design sample locations are slightly within the preliminary removal limits indicated in the ROD.

In the event that preliminary delineation samples contain constituents that remain above cleanup levels, step-out samples will be collected and analyzed to delineate the extent of impact. It is anticipated that step-out samples will be collected between 10 and 25 feet outward (i.e., away from the center of the removal area) from the initial delineation location.

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6. Schedule and Reporting

The pre-design activities discussed in this *Soil Investigation Plan* will commence upon USEPA approval of the RDWP. It is anticipated that the background dioxin sampling (Section 3), the initial phase of cap delineation sampling (Section 4), and delineation sampling in the vicinity of the five Cianci Property removal areas will be conducted concurrently. This would include any followup sampling that is necessary to further evaluate the presence and extent of dioxin and/or to achieve the delineation objectives for the soil removal areas. The completed scope of sampling activities would then be reported as part of the *Pre-Design Investigation Summary Report* (Section 5 of the RDWP). In the event that one or more of the initial investigation components warrants (e.g., an indication that the extent and/or magnitude of dioxin in soil is greater than currently anticipated), a separate plan may be prepared and submitted to the USEPA to present the data and a proposed approach for addressing the issue.

Following completion of ISTR activities and demobilization of equipment, the second phase of the cap delineation sampling will be completed. Results of this portion of the pre-design activities will be summarized and reported in the Conceptual Design Package for the capping component of the remedial approach (Section V.C.1 of the SOW).

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7. References

BBL and USEPA. 2005. *Feasibility Study Report*. Solvents Recovery Service of New England, Inc. Superfund Site, Southington, Connecticut. May 2005.

CTDEP. 1996. Remediation Standard Regulations. January 30, 1996.

USEPA. 1998. Approach for Addressing Dioxin in Soil at CERCLA and RCRA Sites. OSWER Directive 9200.4-26. April 1998.

USEPA. 2005. Record of Decision Summary, Solvents Recovery Service of New England, Inc. (SRSNE) Site, Southington, Connecticut. September 2005.

Weather Underground. 2009. Yearly Summary for 2009 – Southington, CT. <u>http://www.wunderground.com/weatherstation/WXDailyHistory.asp?ID=MC740</u> <u>3&day=12&year=2009&month=2&graphspan=year</u>. 2009.

World Health Organization. 2005. The 2005 World Health Organization Reevaluation of Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-like Compounds. June 2005.

Table

Table I-1. Pre-Design Sampling of Cianci Property Removal Areas SRSNE Superfund Site, Southington, CT

Excavation Area	Sample(s) Exceeding Cleanup Levels				Delineation	Sample	Analytical	Seasonal Low		
	Location ID	Depth (ft bgs)	Constituent	Exceedance Type	Location IDs ² (Depth (ft bgs)	Parameters	Depth	Rationale ³	
1	SB-905	0-2	Pb	PMC	EA1-1			~4'	To delineate the horizontal extent of lead exceeding cleanup levels in	
					EA1-2	0.0	1		removal limits. Sample depth consistent with prior exceedance.	
					EA1-3	0-2	PD			
					EA1-4					
2	SS3-B2	0-0.5	SVOCs	RDEC	EA2-1			NA	To delineate the horizontal extent of SVOCs and manganese	
			Mn		EA2-2	0.4	0\/00a Ma		a basis for establishing removal limits. Sample depth increment	
					EA2-3	0-1	SVOCs, Mn		consistent with anticipated initial removal depth.	
					EA2-4					
3	SS3-B4	0-0.5	SVOCs	PMC & RDEC	EA3-1			~3	To delineate the horizontal extent of SVOCs, PCBs, cadmium and	
			PCBs		EA3-2	0.4			and provide a basis for establishing removal limits. Sample depth	
			Cd	RDEC	EA3-3	0-1	SVOUS, PUBS, Ud/Ur		increment consistent with anticipated initial removal depth.	
			Cr		EA3-4					
4	SB-907	2-4	SVOCs	RDEC	EA4-1			NA	To delineate the horizontal extent of SVOCs exceeding cleanup levels	
					EA4-2	0-2 &	0.400		anup levels. 0-2' and 2-4' samples proposed to delineate horizontal	
					EA4-3	2-4	SVOUS		extent of removal.	
					EA4-4					
5	SB-915	0-2	PCBs	RDEC	EA5-1		PCBs	NA	To delineate the horizontal extent of PCBs and beryllium exceeding	
	SS3-B3	0-0.5	Be		EA5-2		PCBs		SD3-34, SD3-35 and SD3-36 and provide a basis for establishing	
	SD1-05	0-0.5			EA5-3		PCBs, Be		removal limits. Sample depths consistent with prior exceedances and	
	SD3-34	0-0.5			EA5-4	0-2	PCBs, Be		מוזוסיסמפט החנומו ופוווטימו טבענוו.	
	SD3-35	0-0.5			EA5-5		PCBs			
	SD3-36	0-0.5			EA5-6		PCBs			

Notes:

ft bgs - feet below ground surface Mn - manganese

mg/kg - milligrams per kilogram

PMC - Pollutant Mobility Criteria

- RDEC Residential Direct Exposure Criteria
- SPLP Synthetic Precipitation Leaching Procedure

SVOCs - semi-volatile organic compounds

PCBs - polychlorinated biphenyls

Cd - cadmium Be - beryllium

Pb - lead

Cr - chromium

- NA not applicable
- mg/L milligrams per liter

1. Where metals exceed PMC-based criteria, samples will initially be analyzed for total metals concentration. If the mass result (mg/kg) divided by 20 is greater than the PMC (mg/L), then SPLP analysis will be performed, with results compared to the PMC.

2. Additional step-out samples (~10-25 feet from initial delineation sample) will be collected, as needed (i.e., if initial delineation samples do not meet cleanup goals).

3. Vertical delineation will be achieved during excavation, either through bottom confirmatory samples or the depth-related applicability of the PMC and/or RDEC.

Figures





FIGURE **I-1**

PROPOSED BACKGROUND DIOXIN SAMPLE LOCATIONS

SRSNE SUPERFUND SITE SOUTHINGTON, CONNECTICUT SOIL INVESTIGATION PLAN

GRAPHIC SCALE

1. BASEMAP INFORMATION OBTAINED FROM A FIGURE CREATED BY CONKLIN & SOROKA, INC., ENTITLED "TOPOGRAPHIC SURVEY" DATED 1/13/09 AT A SCALE OF 1"=50'.

- PROPERTY LINE 147-5 PROPERTY ID - ADJOINER - BUILDING BUILDING - ADJOINER ----- FORMER BUILDING RAILROAD ROAD GRAVEL ROAD DRAINAGE SWALE RIVER 160----INDEX CONTOUR INTERMEDIATE CONTOUR EASEMENT - CHAINLINK FENCE - SHEETPILE ------ FORCEMAIN - PIPE ٥, UTILITY POLE -T----- TELEPHONE SERVICE TREELINE TREE ٠ BOLLARD PROPOSED DIOXIN SAMPLE LOCATIONS 0

LEGEND:

FLARED END INV = 159.41

- 24" RCP

NOTES:

2. ALL LOCATIONS ARE APPROXIMATE.





	PROPERTY LINE		SHEETPILE
	PROPERTY LINE - ADJOINER		TREELINE
	BUILDING	٠	TREE
	ROAD	•	BOLLARD
	GRAVEL ROAD	<u> </u>	WETLAND
	DRAINAGE SWALE	SB-915	SOIL SAMPLING LOCATIO
	RIVER	- P-10	MONITORING WELL
	FLOODPLAIN - 100 YEAR	● PZR-3	NTCRA 1 PIEZOMETER
	INDEX CONTOUR	CPZ-10	NTCRA 1 COMPLIANCE
	INTERMEDIATE CONTOUR	💮 RW-1	NTCRA OVERBURDEN E>
x	CHAINLINK FENCE	▲ EA5-3	PROPOSED DELINEATION
	ESTIMATED REMOVAL LIMITS PER FIGURE		