

**HAZARDS AND HAZARDOUS MATERIALS
Previous Environmental Investigations**

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PREVIOUS ENVIRONMENTAL INVESTIGATIONS

1.0 Subsurface Investigations Performed on behalf of TDY Industries (also known as Allegheny Industries)

1.1 *Geosyntec Site Characterization Report 2005*

A Site Characterization Report was prepared by Geosyntec on December 19, 2005, to fulfill the requirements of the CAO. The Geosyntec Site Characterization Report provided a summary of subsurface investigations historically performed at the Project site as follows.

Summary of Previous Environmental Investigations Performed at the Project Site

- PES Environmental 2001 Environmental Assessment Report:

In January 2001, PES Environmental prepared an environmental assessment report that documented environmental conditions at the Project site through a site visit, interviews, and review of agency files, site-related environmental documents, and historical records. From this research, a detailed building-by-building site history was developed, which combined site and agency records of historic use, anecdotal evidence of operational practices, and observations of site conditions.

The following areas have reportedly been previously investigated and remedial actions have been taken, resulting in “no further action” letters from the County of San Diego DEH:

- *Building 142* – A 2,000 gallon UST used for storage of gasoline was removed from the southeast corner of Building 142 in 1990. Thirteen wells were installed to characterize the extent of impacts to groundwater. Of these 13 wells, 10 were proposed for abandonment, and a “no further action” letter was granted by County of San Diego DEH on October 23, 2000.
- *Area A* – Area A is located on the northern property boundary east of Building 115 and north of Building 140. Three USTs containing aviation fuel were located in this area until their removal in 1986. The County of San Diego DEH issued a “no further action” letter for Area A in January 1993.
- *Area B* – Area B is located south of Building 149. Two USTs containing diesel fuel were located in this area until their removal in 1986. The County of San Diego DEH issued a “no further action” letter for Area B in September 1992.
- *Area C* – Area C is located west of Building 157 in the northwest corner of the site. Two USTs containing kerosene were located in this area until their removal in 1986. The County of San Diego DEH issued a “no further action” letter for Area C in November 1992.
- *UST No. 19* – UST No. 19 contained diesel fuel and was located on the south side of Building 156, approximately 100 feet from the west end of the building. On August 29, 1994, County



of San Diego DEH wrote a letter confirming the completion of site investigation and remedial action, noting that approximately 260 pounds of diesel fuel remained in the soil.

- *UST No. 7* – UST No. 7 contained diesel fuel and was located south of Building 149 until it was removed in 1992. The County of San Diego DEH issued a “no further action” letter on September 18, 1992.
- *Chemical Mill Masking Tank Near Building 125* – One UST that stored chemical mill masking fluid (which reportedly contains, toluene, 1,1,2,2-tetrachloroethane, and xylenes) was located next to Building 125. The tank was filled with concrete and inspected by the County of San Diego DEH. No further action was required.
- Geosyntec 2002 Site Investigation:
 - A letter from the San Diego Regional Water Quality Control Board (RWQCB) dated November 8, 2001, required TDY Industries (also known as Allegheny Industries) to perform a site assessment of “chromic acid contamination in the vicinity of Building 158” and “chlorinated hydrocarbon contamination in the vicinity of Building 120.” GeoSyntec Consultants prepared a work plan, performed site assessment activities, and prepared their Report of Site Assessment Activities. The report, prepared for TDY Industries (also known as Allegheny Industries), documents the results of the site assessment activities and recommended additional delineation activities, pending concurrence from the San Diego RWQCB.
- Geosyntec 2002 PCB Investigation:
 - A letter from the San Diego RWQCB, dated November 7, 2001, required TDY Industries (also known as Allegheny Industries) to provide current and historical information related to PCBs at the site. GeoSyntec Consultants prepared a work plan, performed site assessment activities, and prepared a PCB Investigation Technical Report. The report, prepared for TDY Industries (also known as Allegheny Industries), documents the results of historical research concerning the use, storage, and disposal of PCBs at the site, sampling and analysis of storm drains, and a tidal influence investigation to determine whether sediments contained in the storm drain system beneath the site could be transported upgradient and beyond the site property boundary due to tidal action.
- Haley & Aldrich 2003 Site Assessment:
 - After TDY Industries (also known as Allegheny Industries) lease was terminated by the SDUPD, the SDUPD retained Haley & Aldrich to conduct an additional site characterization, including former employee interviews and a site-wide soil, soil gas, and groundwater investigation in 2003. Tank #10, located in Building 102, was removed by Haley & Aldrich in June 2003. Tank #10 previously contained diesel fuel until it was emptied in 1989. The County of San Diego DEH reportedly closed the case on August 11, 2004.



- Ongoing Investigations:
 - Shaw Environmental reportedly prepared a report entitled *Site Evaluation and Request for Closure, Area D*. In a letter dated May 12, 2004, the County of San Diego DEH requested additional information. TDY Industries (also known as Allegheny Industries) was reportedly working with the County of San Diego DEH to close this area.
- Remediation of the Storm Water Conveyance System:

On the Project site, portions of the 54-inch storm drain system were cleaned three times between 1986 and 1991 in response to San Diego RWQCB requirements. Sediment was removed from catch basins by shoveling, followed by vacuuming, power brushing, and cleansing with an alkaline surfactant. Portions of the 60-inch storm drain were cleaned out in 1986, 1987, and twice in 1989. Commencing in 1989, the on-site portion of the 30-inch east storm drain was removed and replaced after detecting high concentrations of PCBs along the line.

1.2 *Geosyntec 2005 Investigation and Site Characterization*

During 2005, an extensive investigation of the site was performed by Geosyntec on behalf of TDY Industries (also known as Allegheny Industries). This investigation consisted of evaluating soil and groundwater quality data to identify data gaps; performing a statistical analysis of analytical data to calculate background concentrations of metals and cyanide; and identifying constituents of potential concern based on historical site use and the prevalence of constituents detected in soil and groundwater. Based on this analysis of existing data, soil, sediment, and groundwater sampling were performed to complete the characterization of the nature and extent of residual constituents at the site and surrounding properties. The following is a summary of findings based on the investigations and studies performed in 2005.

- **Results of Soil and Groundwater Sampling**

Soil and groundwater sampling were conducted to complete the site characterization prior to beginning the Remedial Investigation/Feasibility Study (RI/FS) work. These data more clearly defined impacts in the following areas:

- **Building 180:** Confirmed and defined the extent of a potential VOC and metals source area in the vicinity of the loading dock;
- **Northeast of Building 161:** Confirmed and defined the extent of a potential PCE source area in a former outdoor maintenance yard;
- **North of former solvent aboveground storage tank (AST) near Building 166:** Defined the northern extent of VOC/Semi-VOC (SVOC) impacts;
- **Building 120:** Confirmed and defined the southern extent of VOC impacts;
- **Building 158:** Confirmed the extent of chromium impacts to groundwater; and



- **Building 131/242 Area:** Confirmed and defined the lateral extent of VOC and SVOC impacts to soil and groundwater.

- **Results of Storm Water Conveyance System Investigation**

Geosyntec assessed on- and off-site impacts to the Storm Water Conveyance System (SWCS). Based on results collected in sediment samples from catch basins contributing to the Convair Lagoon, PCBs were identified in sediment originating both on-site and off-site. During the 2005 Site Characterization, SWCS sampling activities determined in which branches of the SWCS PCBs at concentrations above 1.0 mg/kg were present. These were reported to be:

- **General Dynamics–Lindbergh Field:** PCBs above 1.0 mg/kg were detected in all branches of the SWCS contributing to the 60-inch storm drain.
- **Airport:** Existing sediment in the 60-inch SWCS contained PCBs at concentrations above 1.0 mg/kg; and existing sediment at one catch basin (B-18) on a tributary to the 54-inch SWCS contained PCBs above 1.0 mg/kg.
- **Site:** Existing sediment within the 60-inch SWCS and in all contributing branches sampled contained PCBs above 1.0 mg/kg; existing sediment in the A-58 catch basin (tributary to the 54-inch storm drain) and all run-in samples contributing to the 54-inch storm drain from the Building 157/Test Cell #4 area contained PCBs above 1.0 mg/kg; existing and run-in sediment contributing to the 30-inch east storm drain contained PCBs above 1.0 mg/kg; and existing sediment contributing to the 30-inch storm drain to San Diego Bay contained PCBs above 1.0 mg/kg. SWCS sampling activities in 2005 also identified the sources of PCBs in run-in and in-line samples collected in the following SWCS locations:
 - 60-inch line: General Dynamics-Lindbergh Field, airport, and on-site;
 - 54-inch line: Airport and on-site;
 - 30-inch east: on-site; and
 - 30-inch to San Diego Bay: on-site.

- **Areas of Potential Concern**

Fourteen Areas of Potential Concern were identified for further evaluation by TDY Industries (also known as Allegheny Industries) in the Risk Assessment and RI/FS programs. These areas and the associated constituents are as follows:

- Building 180 loading dock area (metals, VOCs, total petroleum hydrocarbons (TPH));
- Outside maintenance yard/tool racks near Building 161 (VOCs);
- Above-ground solvent tank near Building 166 (VOCs, SVOCs);
- Building 120 (metals, VOCs, SVOCs, TPH, PCBs);
- South of Building 121 (PCBs);



- Building 222/228 (metals, VOCs, SVOCs, TPH, PCBs, perchlorate);
- Southeast of Building 146 (VOCs);
- Building 158 (metals, VOCs, TPH);
- Test Cell #4/Area D (TPH, VOCs, SVOCs);
- Building 142 Area (VOCs);
- Building 131/242 Area (VOCs, SVOCs, TPH);
- Building 156 (metals, VOCs, TPH);
- Explosives Area (PCBs); and
- SWCS (PCBs).

1.3 *Remedial Investigation/Feasibility Study Geosyntec March 2007*

On behalf of TDY Industries (also known as Allegheny Industries), Geosyntec Consultants prepared a RI/FS for 2701 North Harbor Drive on March 30, 2007. The RI/FS report presented the results of investigation and feasibility studies required by the CAO. The RI/FS presented the results of site investigation, human health risk assessments, and the evaluation of potential remedial alternatives for each Area of Potential Concern (AOPC) identified in the Site Characterization Report. AOPCs are areas where Chemicals of Potential Concern (COPCs) have been detected above site background or appropriate screening levels in the Site Characterization Report. The AOPCs identified in the RI/FS from west to east are as follows:

- *AOPC Building 131/242* – Soil, groundwater and soil gas impacted predominantly with VOCs located adjacent to Buildings 131 and 242.
- *AOPC Explosives Area* – An area at the northwest corner of the site, where a sample contained greater than 1.0 mg/kg PCBs.
- *AOPC Building 156* – Isolated zones of groundwater impacted with VOCs, TPH, soil impacts with VOCs, TPH, metals and PCBs and soil gas impacted with VOCs located beneath Building 156.
- *AOPC Test Cell #4/Area D* – A UST area formerly containing light non-aqueous phase liquid (LNAPL) impacts (pending closure by San Diego RWQCB).
- *AOPC Building 158* – Soil and groundwater impacted with chromium, hexavalent chromium (CrVI), and isolated LNAPL impacts in Building 158, and VOC impacts in soil gas immediately to the southeast of Building 158.
- *AOPC Building 142* – A former UST site with minor VOC impacts in groundwater.
- *AOPC Southeast of Building 146* – An area near the southeast corner of Building 146 where vinyl chloride was detected in groundwater.



- *AOPC Building 120 West* – An area in the west end of Building 120 which contains PCBs above background concentrations in soil.
- *AOPC Building 222/228* – An area northwest of Building 125/126 where elevated chromium, cobalt, lead, mercury, nickel, zinc, and PCBs were detected in soil.
- *AOPC Building 120 South* – An area in the south-central portion of Building 120 where TPH has been detected in soil.
- *AOPC Building 120* – An area beneath and in the vicinity of the former sheet metal fabrication area of Building 120 where PCE, trichlorethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), vinyl chloride (VC), PCBs, and 1,4-dioxane have been detected in soil, soil gas, or groundwater.
- *AOPC Building 121* – An area in the eastern portion of Building 121 where elevated VOCs were detected in groundwater and soil gas, contiguous with “Building 120 impacts.”
- *AOPC South of Building 121* – An area in the vicinity of catch basin CB-155 where PCBs have been detected at concentrations above 1.0 mg/kg in shallow soil.
- *AOPC Building 166 Above Ground Solvent Tank* – An area associated with a former AST, historically containing chlorinated solvents, which was located along the northern border of the site, between Buildings 130 and 166. Groundwater and soil gas contain detections of VOCs; impacts are contiguous with AOPC Building 120.
- *AOPC Former Maintenance Yard* – An area northeast of Building 161 where groundwater and soil gas samples contain elevated PCE concentration.
- *AOPC Building 180* – An area in the vicinity of the loading dock on the south side of Building 180. VOCs have been detected in groundwater and mercury, cobalt, zinc, and lead have been detected at concentrations exceeding background in shallow soils.

Additional investigations were performed on behalf of TDY Industries (also known as Allegheny Industries) at AOPCs to more accurately evaluate, design, and plan remedial options. The additional investigations further delineated the lateral and vertical extent of subsurface impacts. A Site-Wide Human Health Risk Assessment was also conducted to identify areas of the site that would warrant remediation based on reasonable expectations of the future land use at the site. A Feasibility Study (FS) of potential remedial alternatives was conducted for each Area of Concern (AOC) and AOPC. The FS consisted of a screening analysis of potential remedies and a more detailed feasibility analysis of remedies considered potentially appropriate. Based on the FS, recommended remedial options were developed for each AOC and AOPC, and a conceptual RAP was presented.

1.4 Remedial Action Plan, Geosyntec May 2007

The RAP for 2701 North Harbor Drive was prepared on behalf of TDY Industries (also known as Allegheny Industries) on May 30, 2007 and updated in December of 2007 but it has not yet been finalized, by Geosyntec Consultants. The RAP described the conceptual design and recommends alternatives for each AOC based on the results of the RI/FS.



Selected remedial alternatives detailed in the RAP include:

- **Enhanced in-situ bioremediation (EISB)** – EISB will be implemented for groundwater impacted with chlorinated VOCs as presented in the RI/FS. Electron donor and a microbial culture (KB-1®) will be injected into the subsurface to degrade VOCs to innocuous end products. An emulsified vegetable oil (EVO) will be used as the electron donor.
- **In-situ reduction (ISR)** – ISR will be implemented for groundwater impacted with (hexavalent chromium) CrVI as presented in the RI/FS. ISR will be by injection of ferrous sulfate (FeSO₄) into the groundwater to reduce CrVI to trivalent chromium (CrIII).
- **Excavation and off-site disposal (including concrete removal and disposal)** – Excavation and off-site disposal was identified for soils impacted with PCBs, LNAPL, TPH, and VOCs at concentrations that exceed the calculated Risk-Based Concentrations (RBCs). “Pothole excavation” will reportedly be performed in areas where localized elevated concentrations above the site-specific RBCs have been detected. A larger excavation will be performed in Building 120 South AOC, where more widespread concentrations above RBCs were detected.

The RAP details remedial actions by area of concern. The RAP requirements specified in the CAO contain a provision for the development and implementation of a Groundwater Monitoring and Reporting Plan (GMRP) to demonstrate the effectiveness of the selected remedial action. The plan outlines the evaluation of trends in hydrogeologic conditions and groundwater quality at the site. As requested by the RWCQB, a groundwater monitoring and reporting plan was initiated by TDY Industries (also known as Allegheny Industries) prior to remedial activities to monitor temporal variation in groundwater quality and to monitor potential impacts to San Diego Bay. The RAP GMRP incorporated the previous plan and expanded it to further incorporate additional monitoring within the proposed AOCs.

The RAP also includes the requirement of a Cleanup and Abatement Completion Report, to be prepared after remediation is deemed complete. The report will reportedly contain details of the procedures followed for implementing each phase of the RAP and a summary of all data generated during implementation of the RAP including:

- Field activity logs;
- Analytical results of all soil, groundwater, and soil gas samples;
- A summary of the targeted risk assessments performed at each AOC during the remediation process; and
- The Post-Remediation Risk Assessment.

The remediation activities as described in the RAP will proceed independently of the Proposed Project under the oversight and jurisdiction of the San Diego RWQCB pursuant to the CAO.



1.5 *PCB Summary Report, Geosyntec January 27, 2009*

The PCB Summary Report for 2701 North Harbor Drive presented the results of investigations and remedial actions that have been performed to evaluate and mitigate PCBs at the site. The Report also presented site specific remedial standards a feasibility study of remedial solutions and a conceptual remedial action plan. In summary, a total of 15 historical PCB usage areas were identified at the site. All PCV containing materials at these locations were removed by 1990. No known PCB sources remain on the site, however, areas with elevated concentrations of PCBs in surface sediment remain. PCBs were identified throughout the SWCS as well as in soil in the following areas:

- Explosives area
- Building 156 are
- West of Building 120
- Building 222/228 Area
- North of Building 130
- North and West of Building 161
- Building 166
- South of Building 180/181
- South of Building 121

Information regarding PCBs in building materials in located in Section 2.0.

2.0 Hazardous Building Materials Investigations Performed on behalf of SDUPD

2.1 *Ninyo & Moore Master Hazardous Building Materials Survey Report, 2701 North Harbor Drive, February 28, 2003*

Ninyo & Moore performed Hazardous Building Materials Surveys (HBMS) of the buildings and structures located at the former Teledyne Ryan Aeronautical facility. The objective of the survey was to identify, sample, and analyze building materials for ACMs and LBP, and to quantify miscellaneous items that would potentially present an environmental concern, including potential mercury-containing thermostats and switches, light ballasts and switches that might contain PCBs, fluorescent light tubes, exit signs, air conditioning systems, lead-acid batteries and batteries associated with emergency lighting systems, and Freon-containing refrigeration systems. Transformers were not assessed based on Ninyo & Moore's confirmation that all PCB-containing transformers had been removed from the facility (Ninyo & Moore, 2003). During January and February 2003, Ninyo & Moore personnel conducted site-specific HBMS of the designated buildings and structures. The HBMS included an ACM survey utilizing a certified laboratory for asbestos analysis, and assessment of miscellaneous items that may present an environmental concern to the facility. The LBP survey was conducted by Allstate Environmental Services, Inc. under oversight of Ninyo & Moore. Based on the results of visual assessments, x-ray fluorescence (XRF) readings, and laboratory analyses of samples for asbestos content, hazardous building materials were identified in all of the buildings and structures surveyed.

Asbestos Survey

Previous asbestos surveys were conducted at the site by TEST Environmental Surveys in 1989, 1996, 1997, and 1998. The 2003 Master HBMS Report was reportedly conducted to determine the accuracy of



all the previous surveys, and to collect samples of any suspect ACMs that had not been previously sampled or for which an inadequate number of samples had previously been collected. A preliminary visual assessment and bulk sampling survey of suspect ACMs was performed. Representative samples of suspect ACMs were collected after identification of homogenous sampling areas (areas in which the materials are uniform in color, texture, construction or application date, and general appearance). Each homogenous area was observed for material type, location, condition, and friability. Samples were collected in general accordance with the EPA AHERA sampling approach. During the 2003 survey, 1,204 samples were collected, using a wet method to minimize fiber release, and sent to an accredited laboratory. The materials assessed during all of the ACM surveys, their location, condition, and asbestos content are contained in the individual HBMS reports included as an appendix to the Ninyo & Moore 2003 report.

Lead-Based Paint Survey

Prior to 2003, a LBP survey had reportedly not been previously conducted for the facility. During January and February 2003, Allstate performed a LBP survey of the designated buildings and structures at the facility. Following a visual assessment, XRF technology was utilized in general accordance with the U.S. Department of Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-based Paint Hazards in Housing, and Title 17 CFR, Work Practice in Lead-Related Construction. The materials assessed, and their location, color, and condition, are contained in the individual HBMS reports included as an appendix to the Ninyo & Moore 2003 report.

Miscellaneous Hazardous Materials Survey

Ninyo & Moore conducted a visual assessment and quantification of miscellaneous items that would potentially present an environmental concern at the facility. Positive identification of these materials, via analytical testing, was not performed. The results of the surveys are contained in the individual HBMS reports included as an appendix to the Ninyo & Moore 2003 report.

Based on the information provided in the Ninyo & Moore Report, hazardous materials were identified to be widespread in all subject site buildings.

2.2 Winzler & Kelly Consulting Engineers, Draft Pre-Demolition Hazardous Building Material Survey Report, September 2007

Winzler & Kelly performed a pre-demolition hazardous building material update for the former Teledyne Ryan Aeronautical Facility located at 2701 North Harbor Drive. The survey update was performed in planning for demolition activities at buildings and structures located at the site. The Hazardous Material Survey Update was conducted to identify and update the hazardous materials and quantities from the Ninyo & Moore Master Hazardous Building Materials Survey Report dated 2003, and to identify and sample suspect ACMs and asbestos-containing construction materials (ACCMs), to sample representative building components for the presence of lead-containing surface coatings (LCSCs), LBPs, and lead-bearing substances (LBSs), and to identify potential PCB-containing light fixture ballasts, FLTs, mercury-



containing thermostat switches, and other Universal Waste Rule (UWR) materials. Suspect PCB-containing transformers were not included as part of the survey.

Asbestos Survey Update

The asbestos survey update was conducted to identify and update the ACMs/ACCMs and quantities from the 2003 Ninyo & Moore Report in preparation for pre-demolition activities. If necessary, samples of suspect ACMs/ACCMs were collected. Each suspect ACM or ACCM identified was sampled in accordance with sampling guidelines established by the USEPA and 8 CCR 1529. All bulk samples were analyzed by Polarized Light Microscopy (PLM) in accordance with appropriate U.S. EPA methods. The results of the pre-demolition survey update indicated that ACMs and ACCMs are present in all facility buildings.

Lead-Containing Surface Coatings, Lead-Based Paints, and Lead-Bearing Substances Testing Update

The update was conducted to identify and update the LCSCs, LBPs, and LBSs and quantities, if applicable, from the 2003 Ninyo & Moore Report in preparation for pre-demolition activities. During the lead testing services update, Winzler & Kelly only tested painted surfaces in poor condition that were not previously tested. Therefore, painted surfaces in fair or intact condition not previously tested may contain detectable amounts of lead and either may be assumed to be LBP and handled accordingly, or may be sampled and analyzed to assess whether they are LBP. Potential LCSCs, LBPs, and LBSs were identified by visual identification. When necessary, lead testing was performed. The representative, suspect surface coatings were measured on-site through the use of a NITON XL XRF spectrum analyzer. A total of 410 XRF measurements (including calibration readings) for the determination of lead content were collected from the site buildings from July 25 to August 14, 2007. The results of the lead-testing update indicate that building components coated with LCSC, LBP, and LBS are present at the site buildings. The report included tables that list the hazardous materials identified within all subject site buildings, and the location and estimated total quantity of the identified hazardous materials, if applicable.

Universal Waste Rule Materials Update

The update was conducted to identify and update the UWR materials. The report included tables that list the hazardous materials identified within the subject site buildings, and the location and estimated total quantity of the identified hazardous material, if applicable.

Based on the information provided in the Winzler & Kelly Report, hazardous materials were identified to be widespread in all subject site buildings.

2.3 Geosyntec, PCB Summary Report, 2701 North Harbor Drive, January 27, 2009

The PCB Summary Report for 2701 North Harbor Drive presented the results of investigations and remedial actions that have been performed to evaluate and mitigate PCBs at the site. The Report also summarized available information regarding PCBs identified in building materials from previous investigations as follows



- 2002 Haley & Aldrich Building Material Report
 - Between May and June 2003, surface sediment, concrete and building paints were sampled for PCBs across the site. Surface sediment concentrations from the 86 samples collected ranged from non-detect to 237 mg/kg. Concrete chip concentrations from the 33 samples collected ranged from non-detect to 47 mg/kg. Paint chip sample concentrations from the 18 samples collected ranged from non-detect to 26 mg/kg. The highest sediment concentrations were reportedly located in the vicinity of Buildings 157, 158, 150, 120, 126, and 166. The highest concrete chip concentrations were reportedly located in the vicinity of Building 157, 126, 166, 120, and 152. The highest paint chip concentrations were reportedly from Building 152, 156, 150, 140, 128, 166, and 182.
- December 2005 Surface Source Sampling Event
 - In December 2005, TDY collected samples of surface sediment, paint, concrete joint compound, window sealant, asphalt and felt material to identify potential ongoing sources of PCBs on-site. Three interior sediment samples ranged in concentrations from 1.9 mg/kg to 12 mg/kg, with an average concentration of 7.2 mg/kg. Twenty-three exterior sediment samples range in concentration from non-detect to 86 mg/kg with an average concentration of 23 mg/kg. Paint concentrations ranged from non-detect to 10 mg/kg in 6 samples with an average concentration of 5.7 mg/kg. The two felt samples collected contained concentrations of non-detect and 390 mg/kg, respectively. The window sealant contained a PCB concentration of 0.2 mg/kg and the asphalt aggregate contained a PCB concentration of 7.3 mg/kg. Two samples of concrete joint compound were collected. These samples contained concentrations of non-detect and 7,800 mg/kg respectively. The high concentration of joint compound was located immediately to the east of Building 166.
- January 2006 Off-Site Sampling Event
 - In January 2006, TDY collected samples of surface sediment, paint, asphalt, and joint compound to identify potential ongoing sources of PCBs off-site. The surface sediment compound was non-detect for PCBs. The two paint chip samples contained 2.76 mg/kg of PCBs. Of the eight samples of joint compound, six were non-detect for PCBs. The remaining two samples contained 0.60 and 1.97 mg/kg of PCBs respectively.
- April 2006 Transite Sampling
 - In April 2006, TDY collected a sample of the transite paneling from the southern wall of Building 128. The material contained 6.22 mg/kg of PCBs.
- West Site Concrete Chip Sampling
 - In October 2005, Haley & Aldrich collected samples from 50 locations across the western portion of the site. PCB concentrations ranged from non-detect to 62 mg/kg.
- Interim Excavation Activity Concrete Data



- PCBs were detected in concrete chip samples collected from concrete removed during interim remedial actions in Building 156 and 180. The two samples from Building 156 contained 8.5 mg/kg and 13 mg/kg respectively. The concrete sample from the Building 180 excavation contained 0.16 mg/kg.