CITY OF RIVERBANK
LOCAL REDEVELOPMENT AUTHORITY
MEETING
City Hall Council Chambers
6707 Third Street • Riverbank • CA 95367

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AGENDA

MONDAY, FEBRUARY 11, 2013 – 6:00 P.M.

CALL TO ORDER: Chair Richard O'Brien

ROLL CALL:
Chair Richard O'Brien
Vice Chair Jeanine Tucker
Authority Member Darlene Barber-Martinez
Authority Member Dotty Nygard
Authority Member (vacant)

CONFLICT OF INTEREST
Authority Members and Staff who would have a direct Conflict of Interest on any scheduled agenda item to be considered are to declare their conflict.

1. PRESENTATIONS There are no presentations scheduled.

2. PUBLIC BUSINESS FROM THE FLOOR (No Action Can Be Taken)

At this time, members of the public may comment on any item not appearing on the agenda, and within the subject matter jurisdiction of the LRA. Individual comments will be limited to a **maximum of 5 minutes** per person and each person may speak once during this time. Time cannot be yielded to another person. Under State Law, matters presented under this item cannot be discussed or acted upon at this time by the LRA. For record purposes, you must step up to the podium, state your name, and speak into the microphone when addressing the LRA.

3. CONSENT CALENDAR

All items listed on the Consent Calendar are to be acted upon by a single action of the Local Redevelopment Authority unless otherwise requested by an individual Authority Member for special consideration. Otherwise, the recommendation of staff will be accepted and acted upon by roll call vote.

Item 3.A: Waive Readings. All Readings of ordinances and resolutions, except by title, are waived.

Item 3.B: **Approval of the November 26, 2012, Local Redevelopment Authority Closed Session Report** – It is recommended that the Local Redevelopment Authority Board approve the LRA Closed Session report as a record of the Board meeting in closed session and what disclosable action was reported.

Item 3.B-1: **Approval of the November 26, 2012, Local Redevelopment Authority Minutes.**

Item 3.C: **Community Advisory Committee Membership Approval** – It is recommended that the Local Redevelopment Authority Board ("Board") review and approve the application of Joe Heaney to fill the vacancy on the Community Advisory Committee ("Committee").

Recommendation: It is recommended that the LRA Board approve the Consent Calendar by roll call vote.

4. UNFINISHED BUSINESS There are no items to consider.

5. PUBLIC HEARINGS There are no items to consider.

6. NEW BUSINESS

Item 6.1: **Resolution Approving Mid-Year Budget Adjustment for the Riverbank Local Redevelopment Authority and Accepting the Quarterly Budget Report** – It is recommended that the Local Redevelopment Authority Board adopt the attached resolution approving a mid-year budget adjustment for the Riverbank LRA and accept the quarterly report.

Item 6.2: **Resolution to Approve a Supplemental Lease Agreement to Army Lease No. DACA05-1-10-525 to Remediate and Remove Surplus Army Personal Property** - It is recommended that the Local Redevelopment Authority ("LRA") Board of Directors ("BOD") review the attached Supplemental Lease Agreement (SLA #5) and adopt a resolution allowing the City Manager to sign an amendment to that certain Army Lease No. DACA05-1-10-525 ("Lease") that includes additional payments to the Local Redevelopment Authority for the performance of specific duties associated with the remediation and removal of surplus Army equipment.

Item 6.3: **Resolution Approving a Supplemental Contract Amendment to the Existing Riverbank Industrial Complex Facility Management Services Contract with San Joaquin Engineering Solutions** – It is recommended that the Local Redevelopment Authority ("LRA") Board of Directors review and approve the attached contract amending the existing facilities management agreement with San Joaquin Engineering Solutions ("SJES") to include additional tasks performed at the Riverbank Industrial Complex, formerly the Riverbank Army Ammunition Plant ("RAAP") in association with the Supplemental Lease Amendment #5 to that certain Army Lease No. DACA05-1-10-525 ("Lease").

Under this amendment, SJES will perform duties in support of the removal of surplus Army equipment not associated with their existing duties as outlined in the January 31, 2011, agreement with the LRA. A scope of work ("SOW") outlining additional, new duties is attached.

7. COMMENTS

Item 7.1: Staff Comments: (Information Only – No Action)

Item 7.2: Authority Comments: (Information Only – No Action)

ADJOURNMENT

AFFIDAVIT OF POSTING

I hereby certify under penalty of perjury, under the laws of the State of California that the foregoing agenda was posted on the City Hall bulletin board 72 hours prior to the meeting.

Dated this 8th day of February, 2013
Annabelle Aguilar, CMC, Acting City Clerk

Notice Regarding Americans with Disabilities Act:

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the City Clerk's Office at (209) 863-7122. Notification 48-hours before the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting [28 CFR 35.102-35.104 ADA Title II].

Notice Regarding Non-English Speakers:

Pursuant to California Constitution Article III, Section IV, establishing English as the official language for the State of California, and in accordance with California Code of Civil Procedures Section 185, which requires proceedings before any State Court to be in English, notice is hereby given that all proceedings before the City of Riverbank Redevelopment Agency shall be in English and anyone wishing to address the Council is required to have a translator present who will take an oath to make an accurate translation from any language not English into the English language.

General Information:	The Local Redevelopment Authority meets on a "as needed" basis.
Agency Agendas:	The Local Redevelopment Authority agenda is available for public review at the City's website at www.riverbank.org and City Clerk's Office, 6707 Third Street, Riverbank, California generally 72 hours prior to the scheduled meeting. Copies and/or subscriptions can be purchased for a nominal fee through the City Clerk's Office.
Public Hearings:	In general, a public hearing is an open consideration within a regular meeting of the City Council, for which special notice has been given and may be required. During a specified portion of the hearing, any resident or concerned individual is invited to present protests or offer support for the subject under consideration.
Questions:	Contact the City Clerk at (209) 863-7198 or aaguilar@riverbank.org

Any documents produced by the City and distributed to a majority of the LRA regarding any item on this agenda will be made available at the City Clerk's counter at City Hall located at 6707 Third Street, Riverbank, CA.

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY
AGENDA ITEM NO. 3.A

SECTION 3: CONSENT CALENDAR

Meeting Date:	February 11, 2013
Subject:	Waiver of Readings
From:	Jill Anderson, City Manager
Submitted by:	Annabelle Aguilar, CMC, LRA Secretary

RECOMMENDATION

It is recommended that the Local Redevelopment Authority approve the waiver of readings of Ordinances and Resolutions, except by title.

SUMMARY

The approval of the waiver of readings will allow Ordinances and Resolutions to be introduced by title only and acted upon without the need to read the entire text of the item into the public record. The documents related to proposed Ordinances and Resolutions are available for review by the public on the City's website and in the City Clerk's office at City Hall (North).

FINANCIAL IMPACT

There is no financial impact.

ATTACHMENTS

There are no attachments.

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY
AGENDA ITEM NO. 3.B

SECTION 3: CONSENT CALENDAR

Meeting Date:	February 11, 2013
Subject:	Approval of the November 26, 2012, Local Redevelopment Authority Closed Session Report
From:	Jill Anderson, City Manager
Submitted by:	Annabelle Aguilar, CMC, LRA Secretary

RECOMMENDATION

It is recommended that the Local Redevelopment Authority Board approve the LRA Closed Session report as a record of the Board meeting in closed session and what disclosable action was reported.

SUMMARY

The Draft Report of the November 26 2012, Local Redevelopment Authority Closed Session has been prepared for the Authority's review and approval.

FINANCIAL IMPACT

There is no financial impact.

ATTACHMENT

1. November 26, 2012, LRA Closed Session Report

CITY OF RIVERBANK
Local Redevelopment Authority
Closed Session
REPORT
MONDAY, NOVEMBER 26, 2012

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This report is a record of the Local Redevelopment Authority Board meeting in Closed Session on this date and time and what disclosable action was taken.

CALL TO ORDER:

The Local Redevelopment Authority (LRA) of the City of Riverbank met this date in a closed session at 5:30 p.m. at the Riverbank Council Chambers, 6707 Third Street, Riverbank, California with Chair Madueño presiding.

ROLL CALL:

Present:	**Chair Virginia Madueño**
	Vice Chair Dotty Nygard
	Authority Member Richard O'Brien
	Authority Member Jeanine Tucker
Absent:	**Authority Member Jesse James White**

CONFLICT OF INTEREST
Declaration by Chair, Authority Members, and Staff who would have a direct Conflict of Interest on any scheduled agenda item to be considered.

No one spoke.

1. PUBLIC BUSINESS FROM THE FLOOR (No Action Can Be Taken)

At this time, members of the public may comment on any item not appearing on the agenda, and within the subject matter jurisdiction of the LRA. Individual comments will be limited to a **maximum of 5 minutes** per person and each person may speak once during this time. Time cannot be yielded to another person. Under State Law, matters presented under this item cannot be discussed or acted upon at this time by the LRA. The public will be invited to make comments on agenda items when the item comes up for Authority consideration. For Closed Session items, the public will be invited to make comments before the meeting is recessed to Closed Session. For record purposes, you must step up to the podium, state your name, and speak into the microphone when addressing the LRA.

No one spoke.

CHAIR MADUENO ANNOUNCED THE CLOSED SESSION ITEM AND RECESSED THE MEETING AT 5:31 P.M.

2. CLOSED SESSION

Item 2.1: **CONFERENCE WITH LEGAL COUNSEL – ANTICIPATED LITIGATION**
Significant exposure to litigation pursuant to subdivision (b) of Government Code § 54956.9: 1 potential case

Recommendation: Council to give direction to Staff.

CHAIR MADUENO RECONVENED THE MEETING AT 6:00 P.M.

3. REPORT FROM CLOSED SESSION

Item 3.1: Report on Closed Session Item 2.1: **CONFERENCE WITH LEGAL COUNSEL – ANTICIPATED LITIGATION**

ACTION: *Chair Madueno announced that direction was given to Staff.*

ADJOURNMENT

There being no further business, Chair Madueño adjourned the meeting at 6:00:43 p.m.

ATTEST: **APPROVED:**

_____ _____

Annabelle Aguilar, Secretary **Virginia Madueño, Chair**

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY
AGENDA ITEM NO. 3.B-1

SECTION 3: CONSENT CALENDAR

Meeting Date:	February 11, 2013
Subject:	Approval of the November 26, 2012, Local Redevelopment Authority Minutes
From:	Jill Anderson, City Manager
Submitted by:	Annabelle Aguilar, CMC, LRA Secretary

RECOMMENDATION

It is recommended that the Local Redevelopment Authority Board approve the LRA meeting minutes.

SUMMARY

The Draft Minutes of the November 26 2012, Local Redevelopment Authority meeting have been prepared for the Authority's review and approval.

FINANCIAL IMPACT

There is no financial impact.

ATTACHMENT

1. November 26, 2012, LRA Minutes

CITY OF RIVERBANK
LOCAL REDEVELOPMENT AUTHORITY
MINUTES
MONDAY, NOVEMBER 26, 2012

choose civility

CALL TO ORDER:

The Local Redevelopment Authority (LRA) of the City of Riverbank met this date in a session at 7:50 p.m. at the Riverbank Council Chambers, 6707 Third Street, Riverbank, California with Chair Madueño presiding.

ROLL CALL:

Present:	**Chair Virginia Madueño**
	Vice Chair Dotty Nygard
	Authority Member Richard O'Brien
	Authority Member Jeanine Tucker
Absent:	**Authority Member Jesse James White**

CONFLICT OF INTEREST
Declaration by Chair, Authority Members, and Staff who would have a direct Conflict of Interest on any scheduled agenda item to be considered.

No one spoke.

1. PRESENTATIONS *There were no presentations.*

2. PUBLIC BUSINESS FROM THE FLOOR (No action can be taken)

At this time, members of the public may comment on any item not appearing on the agenda, and within the subject matter jurisdiction of the LRA. Individual comments will be limited to a **maximum of 5 minutes** per person and each person may speak once during this time. Time cannot be yielded to another person. Under State Law, matters presented under this item cannot be discussed or acted upon at this time by the LRA. The public will be invited to make comments on agenda items when the item comes up for Authority consideration. For Closed Session items, the public will be invited to make comments before the meeting is recessed to Closed Session. For record purposes, you must step up to the podium, state your name, and speak into the microphone when addressing the LRA.

No one spoke.

3. CONSENT CALENDAR

All items listed on the Consent Calendar are to be acted upon by a single action of the Local Redevelopment Authority unless otherwise requested by an individual Authority Member for special consideration. Otherwise, the recommendation of staff will be accepted and acted upon by roll call vote.

Item 3.A: Waive Readings. All Readings of ordinances and resolutions, except by title, are waived.

Item 3.B: Approval of the October 8, 2012, Local Redevelopment Authority Meeting Minutes.

Item 3.C: Out of State Travel Request to Attend an ADC Board of Director's Meeting in San Antonio, Texas.

Recommendation: Approve the Consent Calendar by roll call vote.

ACTION: ***By motion (Tucker / Nygard / passed 4-0) to approve Consent Calendar Item 3.A through Item 3.C as presented; motion carried by roll call vote.***
ABSENT: Authority Member White

4. UNFINISHED BUSINESS

There were no items to consider.

5. PUBLIC HEARINGS

There were no items to consider.

6. NEW BUSINESS

Item 6.1: **Resubmission of Economic Development Administration Grant for Mid-site Renovation at the Riverbank Industrial Complex** – It is recommended that the Board of Directors authorize the re-submit an application to the Economic Development Administration ("EDA") for a grant for economic adjustment assistance to support redevelopment efforts at the Riverbank Industrial Complex (formerly Riverbank Army Ammunition Plant.)

Debbie Olson, LRA Executive Director, presented the staff report.

ACTION: ***By motion (O'Brien / Nygard / passed 4-0); to adopt Resolution No. 2012-008 authorizing the resubmission of the application to the Economic Development Administration ("EDA") for a grant for economic adjustment assistance to support redevelopment efforts at the Riverbank Industrial Complex (formerly Riverbank Army Ammunition Plant.) as presented; motion carried by roll call vote.***
ABSENT: Authority Member White

Item 6.2: **Accept Report on Status of LRA Budget for First Quarter of FY 2012/13** – The LRA Board is asked to receive and approve the attached report on the status of the Budget for the First Quarter Riverbank Local Redevelopment Authority FY 2012/13.

Pam Carder, LRA Project Management Specialist, presented the staff report.

ACTION: ***By motion (Nygard / Tucker / passed 4-0) to approve the First Quarter Budget Report for the LRA as presented; motion carried by roll call vote.***
ABSENT: Authority Member White

7. COMMENTS *No comments were made by the Board or Staff.*

Item 7.1: Staff Comments: (Information Only – No Action)

Mr. Olsen announced that there would be a CNN news story on the Intuitive Motion entrepreneurs and their segway board.

Item 7.2: Authority Comments: (Information Only – No Action)

No Comments were made by the Authority Board Members.

ADJOURNMENT

There being no further business, Chair Madueño adjourned the meeting at 8:10 p.m.

ATTEST: **APPROVED:**

_____ _____

Annabelle Aguilar, Secretary **Virginia Madueño, Chair**

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY
AGENDA ITEM NO. 3.C

SECTION 3: CONSENT CALENDAR

Meeting Date:	February 11, 2013
Subject:	Community Advisory Committee Membership Approval
From:	Jill Anderson, City Manager
Submitted by:	Debbie Olson, Executive Director, Local Redevelopment Authority

RECOMMENDATION

It is recommended that the Local Redevelopment Authority Board ("Board") review and approve the application of Joe Heaney to fill the vacancy on the Community Advisory Committee ("Committee").

SUMMARY

Due to Mrs. Darlene Barber-Martinez becoming a newly elected Councilmember, the Committee is presenting the Board with the application of Joe Heaney to fill the Committee member vacancy. Mr. Heaney has been attending the Committee meetings and shows interest in serving as a Committee member. Below is a short bio of Mr. Heaney based on the information gleaned from his application.

Joe Heaney
(Executive from Manteca)

Mr. Heaney is knowledgeable in the field of management, entrepreneurship, start-ups, marketing and strategy. He serves or has served on Clearwave Energy and Transmag boards as Chairman; a Board member for International Snack Food Association, Cornnuts, East Bay Humane Society, Volunteers of America (Oakland), and Danville Little League; a Member of San Joaquin Angels; and a mentor for Inner City Advisors

FINANCIAL IMPACT

There is no financial impact associated with this report.

ATTACHMENT

There are no attachments to this report.

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY
AGENDA ITEM NO. 6.1

SECTION 6: NEW BUSINESS

Meeting Date:	February 11, 2013
Subject:	**Resolution** Approving Mid-Year Budget Adjustment for the Riverbank Local Redevelopment Authority and Accepting the Quarterly Budget Report
From:	Jill Anderson, City Manager
Submitted by:	Debbie Olson, Executive Director Pam Carder, Project Management Specialist

RECOMMENDATION

It is recommended that the Local Redevelopment Authority Board adopt the attached resolution approving a mid-year budget adjustment for the Riverbank LRA and accept the quarterly report.

SUMMARY

Quarterly the Riverbank Local Redevelopment Authority is presented with an updated account of the status of the LRA's budget revenues and expenditures. At the mid-year point, any needed budget amendments are also discussed.

Year-to-date, despite less than anticipated revenues, the revenues received have exceeded expenditures by more than $211,000. When coupled with the starting reserve, this means that the account has more than $508,000 "in the bank". This is a healthy 20% reserves. However, the Board should be aware that there are a number of expenditures that only occur in the spring so building up the reserves in the early part of the year is only prudent. The detailed budget review is attached that includes explanations of major deviations from what was expected.

In addition, as it is half way through the fiscal year, budget adjustments are included. The first column on the spreadsheet is the budget that was adopted last June. The second column is the revised budget that is being requested with changes noted in bold and explained in the footnotes. All of the changes but one are due to changes in either the approved OEA grant or the submitted EDA grant. Travel has been reduced to

reflect lower than expected costs and to keep the Administrative Expenses the same as originally budgeted.

BACKGROUND

When the LRA first started managing the Riverbank Industrial Complex (formerly Riverbank Army Ammunition Plant) for the Army, the City Council granted staff some additional latitude in managing the site in return for which quarterly reports were required. This report is intended to meet that requirement.

FINANCIAL IMPACT

Overall, if all expenses are incurred, the mid-year budget adjustment will result in more reserves being used. This is largely due to the increased the cost of the future grant match. However, it appears that not all of the personnel expenses will be used and not all of the security will be used because of the delay in amending the lease to allow removal of the equipment being signed. As always staff watches the budget carefully to ensure that actual expenditures do not exceed actual revenues.

Accepting the quarterly report has not financial impact but it might be noted that for the past quarter, revenues exceeded expenditures by more than 41%.

ATTACHMENT

1. Resolution Approving Mid-Year Budget Adjustment and accepting the Quarterly Report
2. Statement of Revenues and Expenses

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY

RESOLUTION

A RESOLUTION OF THE LOCAL REDEVELOPMENT AUTHORITY OF THE CITY OF RIVERBANK APPROVING A MID-YEAR BUDGET ADJUSTMENT AND ACCEPTING THE QUARTERLY BUDGET REPORT

WHEREAS, the Riverbank Local Redevelopment Authority took over operation of the Riverbank Industrial Complex in April, 2010 and were required by the LRA Board to submit quarterly reports; and,

WHEREAS, the quarterly report for the second quarter of Fiscal Year 2012-13 is complete and shows the need for some budget amendments; and,

WHEREAS, the LRA Board has reviewed the quarterly report and mid-year budget adjustment request.

NOW, THEREFORE, BE IT RESOLVED that the Local Redevelopment Authority Board of the City of Riverbank hereby approves the mid-year budget adjustment and accepts the quarterly budget report.

PASSED AND ADOPTED by the Local Redevelopment Authority Board of the City of Riverbank at a meeting held on the 11th day of February, 2013; motioned by Authority Member _____, seconded by Authority Member _____, and upon roll call was carried by the following vote of ___:

AYES:
NAYS:
ABSENT:
ABSTAIN:

ATTEST:	**APPROVED:**
_____	_____
Annabelle Aguilar, CMC	**Richard D. O'Brien**
Secretary	**Chair**

Attachments: Mid Year Budget Adjustment Spreadsheet

Attachment 1

Mid-Year Budget Adjustment

Riverbank Local Redevelopment Authority
2012-13 Proposed Budget

Revenue	2012-13 Budget	Revised Budget
Beginninng Balance	296,538	296,538
OEA Grants	775,476	**637,027**
Rents	1,040,000	1,040,000
Sale of Real Property		
Sale of Personal Property		
DOD Caretaker Revenue	282,240	282,240
CDBG PTA		
EECBG Grant		
ED Bank - Specific Plan	68,000	68,000
Utility Revenue from Tenants	200,000	200,000
General Fund in Fund 213 (Grant Match)		
Miscellaneous Revenue	24,000	24,000
Other Revenue	75,000	75,000
Total Revenue	**2,761,254**	**2,622,805**
Expenditures		
Salaries/Benefits	521,390	**443,361**
Administrative Expenses		
Travel	15,000	**12,360**
Equipment	11,350	11,350
Office Supplies/Legal Ads	13,940	**13,000**
Phones	4,800	4,800
Copier	3,060	**6,060**
Postage	3,000	3,000
Janitorial	1,100	**1,680**
Professional Services		
Legal	130,000	**236,954**
Other Services	155,200	**43,198**
Insurance Premiums	120,000	120,000
Facilty Operations & Maintenance		
Well maintenance	1,500	1,500
Permits	4,000	4,000
Water Testing	5,000	5,000
Electrical PM	100,000	100,000
Fire Supression Maintenance	8,000	8,000
Landscaping	7,000	7,000
Propane	3,000	3,000
Repairs	51,500	51,500
Common Area Costs	350,000	350,000
Infrastructure Improvements	26,000	26,000
Future Grant Match	301,000	**368,721**
Tenant Improvements		
Facility Mgmt/Security Services Contracts		
Security	175,000	175,000
Facility Management	450,000	450,000
Marketing/Branding	5,000	5,000
CDBG PTA Expenditures		
EECBG Grant		
DCE Contract	78,000	78,000
Total Expenditures	**2,543,840**	**2,528,484**
Net Revenues Less Expenditures	**217,414**	**94,321**

Statement of Revenue and Expenses

Riverbank Local Redevelopment Authority
2012-13 Quarterly Budget

Revenue	2012-13 Budget		2012-13 Mid Year Budget		1st Quarter Jul-Sept Rev/Exp	2nd Quarter Oct-Dec Rev/Exp		2012-13 Year to Date	Remaining Balance
Beginninng Balance	296,538		296,538						
OEA Grants	775,476		**637,027**	1		82,423	4	82,423	554,604
Rents	1,040,000		1,040,000		241,438	294,305		535,743	504,257
Sale of Real Property								0	0
Sale of Personal Property								0	0
DOD Caretaker Revenue	282,240		282,240		74,535	94,080		168,615	113,625
ED Bank - Specific Plan	68,000		68,000					0	68,000
Utility Revenue from Tenants	200,000		200,000		8,417	68,236	5	76,653	123,347
Miscellaneous Revenue	24,000		24,000		12,982	4,010		16,992	7,008
Other Revenue	75,000		75,000					0	75,000
Total Revenue	**2,761,254**		**2,622,805**		**337,372**	**543,054**		**880,426**	**1,742,379**
Expenditures									
Salaries/Benefits	521,390		**443,361**	1	**86,223**	95,007		181,230	262,131
Administrative Expenses									
Travel	15,000		**12,360**	2	2,274	790		3,064	9,296
Equipment	11,350		11,350				6	0	11,350
Office Supplies/Legal Ads	13,940		**13,000**	2	731	994	7	1,725	11,275
Phones	4,800		4,800		936	762		1,698	3,102
Copier	3,060		**6,060**	2	2,276	1,057		3,333	2,727
Postage	3,000		3,000		16	30	8	46	2,954
Janitorial	1,100		**1,680**	2		545		545	1,135
Professional Services									
Legal	130,000		**236,954**	1	8,289	15,103	9	23,392	213,562
Other Services	155,200		**43,198**	1		13,898		13,898	29,300
Insurance Premiums	120,000		120,000						120,000
Facilty Operations & Maintenance									
Well maintenance	1,500		1,500				10	0	1,500
Permits	4,000		4,000		24	636		660	3,340
Water Testing	5,000		5,000		985	1,110		2,095	2,905
Electrical PM	100,000		100,000		3,221		11	3,221	96,779
Fire Supression Maintenance	8,000		8,000					0	8,000
Landscaping	7,000		7,000		1,840	1,390		3,230	3,770
Propane	3,000		3,000		479	206		685	2,315
Repairs	51,500		51,500		23,687	15,753		39,440	12,060
Common Area Costs	350,000		350,000		52,500	83,686	5	136,186	213,814
Infrastructure Improvements	26,000		26,000					0	26,000
Future Grant Match	301,000		**368,721**	3				0	368,721
Tenant Improvements									
Facility Mgmt/Security Services Contracts									
Security	175,000		175,000		25,860	38,437	12	64,297	110,703
Facility Management	450,000		450,000		74,314	113,664		187,978	262,022
Marketing/Branding	5,000		5,000		265	1,543		1,808	3,192
DCE Contract	78,000		78,000					0	78,000
Total Expenditures	**2,543,840**		**2,528,484**		**283,920**	**384,611**		**668,531**	**1,859,953**
Net Revenues Less Expenditures	**217,414**		**94,321**		**53,452**	**158,443**		**211,895**	

1	After adoption of the budget, the OEA Grant was required to be changed to the amount shown under revenue. This also affected several expenditure categories.
2	The changes in Administrative Expenses are the result of two factors. First, office supplies/legal ads was affected by the OEA Grant approved. The actual grant amounts differed from what was proposed at the time the budget was completed. Second, in order to keep the total amount allocated to Administrative Services the same, travel was reduced.
3	Following budget adoption, the actual amount of money needed for the EDA grant match was determined and has been adjusted in this budget.
4	OEA Grant revenue is always in arrears as it is on a reimbursement basis.
5	Utility bills from Hetch Hetchy have been late several times during this fiscal year so both revenues and expenditures are less than anticipated.
6	Equipment is in the process of being purchased.
7	Office Supplies are lower than anticipated because they simply werend needed. Legal Ads were also less than expected.
8	Postage has been less than expected because newsletters have been delayed. The intern working on the newletters quit and a new one was just hired so this account should show more activity next quarter.
9	With the delay in the MOA and Amendment 5 of the lease, these funds were not expended as expected.
10	As with many line items, this amount is in case there needs to be some maintenance. None has been needed.
11	Staff is still working on getting quotes for competitive bids on this line item
12	Cost for security was anticipated to go up with the signing of Amendment 5 which has been delayed but is not proceeding.

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY
AGENDA ITEM NO. 6.2

SECTION 6: NEW BUSINESS

Meeting Date:	February 11, 2013
Subject:	**Resolution** to Approve a Supplemental Lease Agreement to Army Lease No. DACA05-1-10-525 to Remediate and Remove Surplus Army Personal Property
From:	Jill Anderson, City Manager
Submitted by:	Debbie Olson, Executive Director

RECOMMENDATION

It is recommended that the Local Redevelopment Authority ("LRA") Board of Directors ("BOD") review the attached Supplemental Lease Agreement (SLA #5) and adopt a resolution allowing the City Manager to sign an amendment to that certain Army Lease No. DACA05-1-10-525 ("Lease") that includes additional payments to the Local Redevelopment Authority for the performance of specific duties associated with the remediation and removal of surplus Army equipment.

BACKGROUND

The Army's active mission at RAAP ended in March 2010, when casing production ceased. On March 31, 2010, the RAAP facility was reclassified by the Department of Defense as closed.

On April 1, 2010, the LRA signed a Lease, with the Army, effectively assigning responsibility for much of the site over to the LRA. As part of this lease, the Army also assigned a variety of operations and security duties associated with the ongoing care of the facility to the City of Riverbank LRA. These provisions are otherwise known as operations and maintenance responsibilities ("O&M").

Under the terms of the Lease, and as consideration to the LRA for O&M on the premises, the Army agreed to provide reimbursement for reasonable costs incurred for security, maintenance, repair, and other costs related to operating the RAAP.

Additional special tasks have been assigned to the LRA since the initial Lease was signed and, as needed, additional payments or adjustments have been made to the

LRA for providing those services. For example, during an extraordinary storm event, breaches in the storm water ponds required repairs. An additional payment from the Army for these maintenance operations was necessary to complete the scope of work because it fell outside the parameters of the existing duties and the existing lease does not allow for major repairs, improvement or other upgrades to the site.

In 2009, PCB-containing Galbestos paneling was discovered as siding and roofing on several of the main RAAP buildings. Subsequent testing found PCB contamination from exfoliated Galbestos particles present on stored equipment and other select surfaces throughout the buildings. Most of the contamination is present as dust particles, although testing also found that some PCB had penetrated building and equipment paint.

REMEDIATION OF CONTAMINATED SURPLUS PERSONAL PROPERTY

The Army has asked the LRA to manage the remediation and removal of contaminated surplus Army personal property across the facility at Army expense. Over the past 15 months, the Army, LRA, environmental consultants and relevant environmental regulatory agencies have met cooperatively to discuss the details of the project and work out an approach to clean up and remove the personal property which generally follows procedures and standards established in the existing EPA regulations and allows the work to start at the earliest possible opportunity.

The following documents are the outcome of the aforementioned meetings:

- An inventory of the surplus Army equipment included in this project
- A detailed scope of work
- Environmental Protection Agency approval letter
- Detailed project costs

The scope of work is included as an attachment to the Lease Amendment #5 staff report. The scope of work is extensive but the tasks generally involve vacuuming surplus equipment, moving the pieces to a cleaning area and then onto a truck for disposal or to a clean storage area for future sale or use.

Most of the work will be performed by sub-contractors and overseen by environmental consultants. The LRA is proposing that a few of the tasks, removal of non-fixed items such as bins, lockers and pallets, be assigned to the existing facility management company. The current facility management company staff has the necessary certifications and training to perform specified tasks and are far more familiar with the facility and the surplus equipment, which has translated into being able to perform certain tasks at a reduced cost.

BENEFITS OF APPROVAL

Critical to the ability for the LRA to attract new tenants and generate revenue to fund additional redevelopment activities is the removal of this surplus equipment to create manufacturing space and to elevate the environmental conditions on and off site.

Approximately 10 individuals are expected to be locally hired for the project. Training in fork lift operations, OSHA Safety and Hazardous Materials Handling will be provided onsite, if needed.

Contracting for the work to be completed under the existing O&M contract helps the Army move the disposal of thousands of pieces of equipment ahead of transfer of the property and reduces the government's exposure to environmental risk.

The LRA, in consultation with Weston Solutions[1] and in coordination with the Army, have been developed a work plan and a safety plan for the project and are prepared to begin almost immediately.

TERMS OF SUPPLEMENTAL LEASE AGREEMENT #5

Under the terms of SLA#5, the Army will pay the LRA between $10,600,000 and $11,200,000 in one lump sum for services outlined in the scope of work. Additional payments for the remainder will be submitted and made upon completion of the equipment removal. This is because the cost assumptions are based on gross weight of the equipment, which will need to be verified at the time of disposal. Additional weight over and above what was estimated will require the Army to make additional payments.

The work is expected to take six months to complete.

FINANCIAL IMPACT:

No general funds will be necessary for the operations and maintenance of the property.

The LRA will receive an estimated $11,200,000 in payments in exchange for providing additional operations and maintenance at the Riverbank Army Ammunition Plant.

ATTACHMENTS:

1. Supplemental Amendment — Amendment to require the Army to pay the LRA for the remediation and removal of certain identified Army-owned personal property

[1] Weston Solutions is an international environmental services contractor publicly procured to support environmental remediation work at the facility

2.	Scope of Work Amendment #5	Scope of Work to be performed under
3.	Resolution	Approves the supplemental amendment to the lease with the Army to require the Army to pay the LRA for remediation and removal of surplus Army personal property.

SAMPLING AND ANALYSIS PLAN
AND
EQUIPMENT INVENTORY

EQUIPMENT REMOVAL PROJECT
RIVERBANK army AMMUNITION PLANT

Riverbank, California

January 2013

Prepared for

Riverbank Local Redevelopment Authority
Riverbank, California

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ABBREVIATIONS AND ACRONYMS

µg/100cm^2	micrograms per 100 square centimeters
COC	chain-of-custody
EDD	electronic data deliverable
EPA	U.S. Environmental Protection Agency
LCD	laboratory control duplicate
LCS	laboratory control sample
LOD	limit of detection
LOQ	limit of quantitation
mg/kg	milligrams per kilogram
NACE	National Association of Corrosion Engineers
PCB	polychlorinated biphenyl
PPE	personal protective equipment
QC	quality control
RAAP	Riverbank Army Ammunition Plant
RCRA	Resource Conservation and Recovery Act
RPD	relative percent difference
SAP	Sampling and Analysis Plan
TSCA	Toxic Substances Control Act
Weston	Weston Solutions, Inc.

1. PURPOSE

The purpose of this Sampling and Analysis Plan (SAP) is to define the types of samples to be collected as part of a Toxic Substances Control Act (TSCA) risk-based project to dispose of equipment from several buildings at the former Riverbank Army Ammunition Plant (RAAP) in Riverbank, California (Figure 1). The SAP also provides procedures for sampling, analysis, and data management and includes a categorized equipment inventory specifying anticipated disposal options. The equipment and items are located within the former Production Area at the RAAP (Figure 2).

The cleaning and sampling procedures described in this SAP are based on the TSCA risk-based disposal approval and amendments received by the U.S. Army from the U.S. Environmental Protection Agency (EPA)[1] (Appendix A). The requirements of the approval letters and the corresponding sections of the SAP where the requirements are addresses are as follows:

EPA Approval Requirements	Location Addressed in SAP
General Conditions	
A.1; Inventory	Section 2 and Appendices B and C
A.2; Equipment not covered	Appendix B, Table B-2.3
A.3; SAP	Sections 5 through 9
Specific Conditions	
B.1.a; Equipment Reuse-Painted Metal	Section 4.3
B.1.b; Reuse-Uncoated Metal	Section 4.3
B.2.a; Disposal Offsite	Sections 3, 4.1, and 4.2
B.3.a; Disposal in a Smelter or Recovery Oven	Not applicable
B.5.a,b; Determining PCB Concentrations for Offsite Disposal	Sections 4 and 5
B.6.a; Land Disposal	Sections 4.1 and 4.2
B.7; Decontamination Wastes	Section 4.1
B.8.a; Sequence of Equipment Cleanup	Section 2 and Appendix C
B.9.a; Oil-Filled Equipment	Section 4.2 and Appendix B
B.10; Limitation of Exposure	Section 3 and Appendix C
B.11; Recordkeeping	Sections 2 and 8.5

[1] EPA Region IX Phase 1 Approval letter dated September 4, 2012, as amended in a letter dated October 29, 2012 and an email dated December 13, 2012 (Appendix A)

In addition to the equipment to be removed, miscellaneous chemicals were encountered during the inventory process, including unused drummed chemicals, which will be characterized, packaged, and transported for disposal at an appropriate disposal facility. Other wastes will also be removed from equipment, e.g., glycol from radiators, motor oil from crankcases, and hydraulic fluids, which will be characterized, drained, packaged, and transported for disposal at appropriate disposal facilities.

2. EQUIPMENT INVENTORY

Equipment inventories were conducted in 2011 and 2012 to estimate the weights of large presses and other equipment that may have been impacted by polychlorinated biphenyls (PCBs) released from degradation of Galbestos siding and roofing panels. The estimated equipment totals are 5,082.5 tons for the presses (painted metal) and 2,628 tons for other equipment (2,276 tons of painted metal, 169 tons of bare metal, and 183 tons of miscellaneous porous/trash items). The inventories and estimated weights are attached (Appendix B-1 and Appendix B-2, respectively). The inventories identify specific pieces of equipment that may contain oils. In addition, the inventories are segregated by the anticipated disposal options as listed below:

Appendix B-1	Fixed Hydraulic and Mechanical Presses
Table B-1	Painted Hydraulic and Mechanical Presses Disposal: Landfill Disposal or Paint Removal/Scrap
Appendix B-2	Non-Fixed Process Equipment and Other Miscellaneous Personal Property
Table B-2.1	Painted Equipment Disposal: Landfill Disposal or Paint Removal/Scrap
Table B-2.2	Non-Painted Equipment Disposal: Landfill Disposal or Scrap
Table B-2.3	Miscellaneous Porous/Trash Items Disposal: TSCA Landfill

The actual weights of each category of equipment and other materials will be determined and documented during removal of the items.

3. SUMMARY SCOPE OF WORK

A detailed description of the work sequence and logistics, including cleaning of access corridors, and equipment movement to cleaning stations and temporary staging locations prior to disposal, is provided in Appendix C to this SAP. A summary of work to be performed is as follows:

Equipment will be removed from the designated RAAP buildings, decontaminated of dust, segregated in staging areas, sampled, and transported off-site for landfill disposal. A limited number of presses in Building 8 may remain for use at the former RAAP in a commercial/industrial setting. The presses will be cleaned later, after removal of equipment, as part of a separately permitted activity to clean the interior of buildings and remove the Galbestos panels. Unpainted equipment or painted equipment with high potential scrap value may be decontaminated as described in Section 4.3 to allow unrestricted disposal as scrap (i.e., not at a recovery oven or smelter).

Access corridors will be vacuumed to remove dust from floors, and crews will drain and collect fluids from equipment for characterization and disposal. Forklift crews will retrieve debris and small equipment items from the buildings and transport them to a pressure-washing station where a crew will remove the contaminated surficial dust. The wastewater from this operation will be contained and treated as described in Section 5.5. Hand-wiping with a detergent or a solvent (kerosene, diesel fuel, terpene hydrocarbons or terpene alcohols per EPA Region IX Phase 1 Approval Letter dated September 4, 2012) may also be employed in addition to or in lieu of pressure-washing. Hazardous materials will be collected for appropriate disposal. Once an area has been cleared of debris and small equipment that can be moved by forklifts, the production lines (large ovens, paint spray booths, and presses) will be dismantled or cut into manageable pieces using standard demolition equipment such as plasma cutters, torches, and/or excavator-mounted hydraulic shears. Removed equipment and other items will be segregated as follows:

1. Unpainted metal
2. Painted metal
3. Porous trash/materials
4. Hydraulic fluids

5. Hazardous materials
6. Decontamination and cleanup wastes

Porous/trash materials coated (painted) or unpainted non-porous items (excluding electrical equipment or PCB items), may be assumed to contain PCBs at concentrations above TSCA requirements and transported for disposal at a TSCA landfill without sampling (with the exception of analysis required by the landfill for waste profiling). Some unpainted equipment and painted equipment will be sampled for PCBs as described in Sections 4 and 5 to evaluate the potential for other disposal options such as in-state landfill disposal or possible recycling as scrap. Hazardous materials will be characterized and containerized for appropriate off-site disposal.

At the conclusion of the equipment removal project, sampling equipment and tools will be decontaminated in accordance with EPA regulations (40CFR761.79(c)(2)). Recordkeeping and project documentation will include sampling logs, analytical data, photos of equipment recycled as scrap, and waste manifests documenting equipment and waste disposal offsite.

The sequence of field tasks is shown on the project schedule (Figure 3).

4. SAMPLING REQUIREMENTS

Sampling requirements and disposal evaluation criteria are summarized as follows:

Materials	Sampling Required	PCB Evaluation Criteria	Disposition
Items for direct TSCA landfill disposal (e.g., dust, porous trash, cleanup waste); Appendix B, Table B-2.3	None required (except profiling per landfill requirements)	Not applicable (assumed to be ≥ 50 mg/kg)	TSCA landfill
Pressure-washed equipment - unpainted metal; Appendix B, Table B-2.2	PCB wipe samples, 1 per 50 tons; random locations	≥ 10 µg/100 cm^2 and < 100 µg/100 cm^2	In-state landfill
		≥ 100 µg/100 cm^2	TSCA landfill
Pressure-washed equipment - painted metal; Appendix B, Tables B-1 and B-2.1	PCB paint samples, one 5-point composite per 250 tons; randomly spread	≥ 1 mg/kg and < 50 mg/kg	In-state landfill
		≥ 50 mg/kg	TSCA landfill
Scrap-unpainted or painted metal stripped of paint to NACE No. 2 standard; high-value or high-weight items from Appendix B, Tables B-1, B-2.1, and B-2.2	10% of items in initial subgroup, 10% of second subgroup, and 20% in third group (as described in Section 4.3)	< 10 µg/100 cm^2 and/or < 1 mg/kg	Recycle as scrap if economically viable
Chemicals	Waste profiling	Per RCRA/TSCA requirements	RCRA or TSCA landfill or treatment, storage and/or disposal facility
Waste oil; equipment expected to contain oils are highlighted in the inventory tables in Appendix B	PCBs (and other constituents for reclamation)	< 1 mg/kg	Oil reclamation
		Between 1 mg/kg and 50 mg/kg	In-state landfill
		≥ 50 mg/kg	TSCA facility

4.1 DISPOSAL AT A TSCA LANDFILL

Bags of bulk dust, porous trash, and cleanup wastes will be transported to a TSCA-approved landfill without sampling (or at the minimum rate required by the landfill for profiling). Coated (painted) non-porous items (excluding electrical equipment or PCB items) and smaller uncoated metal items may also be collected for direct disposal at a TSCA-approved landfill without sampling.

4.2 DISPOSAL AT AN IN-STATE LANDFILL

For unpainted metal, wipe samples will be collected at a frequency of 1 sample per every 50 tons. If the results are greater or equal to 10 µg/100 cm^2 but less than 100 µg/100 cm^2, the waste will be transported for disposal to a permitted in-state landfill. If the results are greater or equal to 100 µg/100 cm^2, the waste will be transported for disposal to a TSCA-approved landfill. If it becomes apparent that this waste stream consistently requires disposal at a TSCA-approved landfill, sampling will be reduced to the minimum required by the landfill for profiling.

For painted metal, five-point composite paint samples will be collected at a frequency of 1 sample per every 250 tons. If the results are less than 50 mg/kg, the waste will be transported for disposal to a permitted in-state landfill. If the results are greater or equal to 50 mg/kg, the waste will be transported for disposal to a TSCA-approved landfill. If it becomes apparent that this waste stream consistently requires disposal at a TSCA-approved landfill, sampling will be reduced to the minimum required by the landfill for profiling.

4.3 POST-DECONTAMINATION SAMPLING FOR RECYCLE AS SCRAP

If wipe sample results are less than 10µg/100cm^2, the following additional sampling may be performed to allow disposal by a scrap metal recycler. A minimum of 10% of items (initial subgroup) in each group will be sampled. If PCB concentrations are below 10µg/100cm^2 in all items comprising the initial subgroup, then no additional sampling will be performed for that group of items and the items will be cleared for recycle as scrap. If PCBs are detected at or above 10µg/100cm^2 in any of the items in the initial subgroup, a second 10% of items (second subgroup) not yet tested and remaining in the group will be tested using wipe samples. If PCB concentrations are below 10µg/100cm^2 in all of the second subgroup items, then only the initial subgroup items that failed the wipe test will be re-cleaned. If PCBs are detected at or above 10µg/100cm^2 in any if the second subgroup items, then all remaining equipment will be re-cleaned in addition to the items in the second subgroup that failed the wipe tests; and a minimum of 20% of the re-cleaned items (third subgroup) will be sampled using wipe samples to allow clearance for recycle as scrap. Alternatively, the failed subgroups will be disposed at a landfill as described in Section 4.1.

If paint results from equipment staged for landfill disposal are less than 1 mg/kg, the items within that sample group may be sampled further to allow recycle as scrap. Verification sampling will be performed (10% initial subgroup, 10% second subgroup with disposal in a permitted landfill of any initial group items that fail if all items in the second group are less than 1 mg/kg, or disposal in a permitted landfill of the entire group if there are failures of the second subgroup).

High-value or high-weight painted metal may be stripped of paint and also be evaluated for recycling as scrap. Paint will be removed by chemical stripping or abrasive blasting to the National Association of Corrosion Engineers (NACE) No. 2, Near-White Blast Cleaning standard. This standard covers the requirements for near-white blast cleaning of unpainted or painted steel surfaces by the use of abrasives. These requirements include the end condition of the surface and materials and procedures necessary to achieve and verify the end condition. A near-white metal blast cleaned surface, when viewed without magnification, shall be free of all visible oil, grease, dust, dirt, mill scale, rust, coating, oxides, corrosion products, and other foreign matter, except for staining as noted. Random staining must be limited to no more than 5 percent of each unit area of surface as defined, and may consist of light shadows, slight streaks, or minor discolorations caused by stains of rust, stains of mill scale, or stains of previously applied coating. Verification sampling will be performed (10% initial subgroup, 10% second subgroup, and 20% re-cleaned third subgroup as described previously).

4.4 CHEMICAL SAMPLING

Chemicals and potentially hazardous materials other than PCBs are located throughout the facility. Recyclable materials such as lead core batteries will be reclaimed. Materials regulated under TSCA such as PCBs will be disposed as required by TSCA regulations and the EPA approval letters. Materials that, by their waste characteristics, are defined as Resource Conservation and Recovery Act (RCRA) hazardous will be disposed of at an appropriate RCRA permitted facility. Qualified personnel will characterize, package, and dispose of chemicals in accordance with applicable regulations.

4.5 WASTE OIL SAMPLING

Hydraulic fluids from the presses and other hydraulically operated equipment will be sampled and analyzed for PCBs. Hydraulic fluids will be drained and consolidated based on results of analysis prior to equipment removal. Lubricating oils from abandoned forklifts and other rolling stock will also be drained and analyzed for PCBs. Fluids/oils containing PCB concentrations greater than or equal to 50 mg/kg will not be mixed with fluids with PCB concentrations below 50 mg/kg. After waste profiling, waste oil will be recycled (provided PCBs are not detected at 1 mg/kg or greater) or disposed at an in-state landfill (PCB concentration < 50 mg/kg) or at TSCA-approved facility (PCB concentrations ≥ 50 mg/kg). Additional analyses and frequency of sampling will be per disposal facility requirements.

5. SAMPLE COLLECTION

The following types of samples will be collected during the performance of this project:

- Wipe samples of unpainted metal
- Paint chip samples
- Liquid samples of hydraulic oil
- Water samples
- Characterization samples for compositing and/or disposal of hazardous materials

5.1 WIPE SAMPLES

The following equipment and supplies will be required:

- Wipes: cotton or gauze squares or rectangles
- Stainless steel or Teflon-coated forceps
- Teflon squeeze bottle with hexane
- Pre-cleaned sample containers and labels
- Templates, 100 square centimeters each
- Permanent marker, wax pencils, pens
- Chain-of-Custody (COC) forms
- Disposable sampling gloves
- Safety glasses and other appropriate personal protective equipment (PPE)
- Paper towels
- Field log book
- Sample packaging and shipping supplies

Surface area will be sampled as follows:

1. Organize the sampling supplies in a clean area in the vicinity of the sampling point.

2. Wear disposable gloves, safety glasses, and other appropriate PPE while sampling.
3. Obtain a square or rectangular gauze or cotton wipe, fold it first in half lengthwise, then fold the edges to meet in the center, and finally fold the wipe along the center line. The edges will be inside the folded wipe. Insert the tips of the forceps inside the wipe to hold the edges. Two rectangular wiping surfaces will be available for use.
4. Slightly moisten the wipe with hexane by spraying it from the squeeze bottle.
5. Overlay the template onto the area to be sampled and mark the boundaries with a wax pencil.
6. Cover the surface inside the template with 10 overlapping passes of one side of the folded wipe, every time moving in the same vertical direction (upward or downward) as shown on Figure 4.
7. Turn the forceps over to switch to the unused side of the wipe and cover the surface with another 10 overlapping passes, every time moving in the same horizontal direction (for example, from left to right) as shown on Figure 4.
8. Place the wipe into a sample container.
9. Seal the container with the lid, label it, and place it in a resealing bag inside a cooler with ice.
10. Mark the sampled equipment with a sample ID number.
11. To collect another sample, change gloves, decontaminate the forceps with hexane, and repeat steps 3 through 10.
12. Complete sampling records in the field log book and fill out the COC Form.
13. Pack the samples for shipment as described in Section 8.4.
14. Ship the samples to the laboratory at soon as possible and by the fastest available delivery service.

5.2 PAINT CHIP SAMPLES

To collect paint sample, the following equipment and supplies will be required:

- Pre-cleaned sample containers and labels
- Paint scrapers and steel blades
- COC forms
- Disposable sampling gloves
- Safety glasses and other appropriate PPE
- Paper towels

- Field log book
- Permanent marker, wax pencils, pens
- Sample packaging and shipping supplies

Paint will be sampled as follows:

1. Organize the sampling supplies in a clean area in the vicinity of the sampling point.
2. Wear disposable gloves, safety glasses, and other appropriate PPE while sampling.
3. Identify the area to be sampled.
4. Scrape the area with a new or decontaminated paint scraper or blade and collect paint chip samples into a sample container. For composite samples, samples will be composited by the laboratory on a weight basis.
5. Seal the container with the lid, label it, and place it in a resealing bag inside a cooler with ice.
6. Mark the sampled equipment with a sample ID number.
7. To collect another sample, change gloves, decontaminate blade with a paper towel moistened with hexane, and repeat steps 3 through 6.
8. Complete sampling records in the field log book and fill out the COC Form.
9. Pack the samples for shipment as described in Section 8.4.
10. Ship the samples to the laboratory at soon as possible and by the fastest available delivery service.

5.3 CHEMICAL SAMPLES

Chemicals present in the buildings will be removed for chemical labpacking and disposal. Qualified personnel will characterize, package, and dispose of chemicals in accordance with applicable regulations.

5.4 WASTE OIL SAMPLES

Hydraulic fluid and motor oil drained from equipment will be consolidated in drums and composite samples will be collected and analyzed for PCBs and other required constituents in accordance with recycling and/or disposal facility requirements. Composite samples will be prepared by the laboratory on a weight basis.

5.5 WASTEWATER SAMPLES

Wastewater from the decontamination station will be treated using a skid-mounted filtration and carbon adsorption system and recycled for reuse. Prior to disposal, grab samples of the treated water will be collected and analyzed for parameters as required by the Riverbank Wastewater Treatment Plant or an off-site disposal facility.

6. LABORATORY QUALIFICATIONS

The laboratory facilities that will provide analytical services for the project will be accredited under the State of California Department of Health Services Environmental Laboratory Accreditation Program and the Department of Defense Environmental Laboratory Accreditation Program. Laboratories selected for the project will be capable of providing the required turnaround time and data deliverables required by this SAP. Quality assurance personnel for the laboratory will be designated in each laboratory's Quality Assessment Manual. The analytical laboratory will designate a project manager for this project.

The laboratory will receive a copy of the SAP and its revisions and amendments. At the laboratory, the project manager is responsible for its implementation.

7. DATA QUALITY OBJECTIVES

Data collected at the RAAP from equipment, dust and other matrices will be of sufficient quality and quantity to support the project objective, which is the disposal of removed equipment, dust, and waste oil drained from equipment. This objective does not warrant the collection of field QC samples. Nevertheless, one blank wipe sample will be analyzed to verify the quality of materials used for sampling.

7.1 ANALYTICAL METHOD REQUIREMENTS

Analytical methods utilized over the course of the project will be approved by the EPA, another regulatory agency, or be accepted as industry standard. The following methods of the Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846 (EPA, 1996), latest update, will be used in the course of the project work:

- Extraction of solid matrix (paint)—EPA Methods 3540 (Soxhlet) or 3541 (automated Soxhlet)
- Extraction of wipes—EPA Method 3550 (ultrasonic extraction)
- Extraction of liquid matrix—EPA Methods 3510 (separatory funnel liquid-liquid extraction) or 3520 (continuous liquid-liquid extraction)
- Cleanup of extracts—EPA Method 3665 (sulfuric acid) and/or EPA Method 3660 (sulfur cleanup with copper option)
- Analysis—EPA Method 8082 for all matrices

7.2 LABORATORY QUALITY CONTROL CHECKS

The recovery of known additions is a part of laboratory analytical protocols. The use of additives at known concentrations allows detecting the matrix interferences and estimating the impact of these interferences when present. It also allows evaluating the efficiency of extraction procedures and overall accuracy of analysis. Laboratory internal quality control (QC) checks will be included as applicable and appropriate per the analytical method:

- Laboratory control sample (LCS)

- Laboratory control duplicate (LCD)
- Surrogate standards
- Method and instrument blanks

Matrix spike/matrix spike duplicate samples will not be submitted for laboratory analysis during this project as inappropriate for the matrices being analyzed and for the overall data quality objective, which is disposal characterization. Matrix spikes apply to environmental samples such as soil or groundwater and are inapplicable for matrices such as paint chips and wipes. All decisions related to data quality will be made based on laboratory QC samples described in the following sections.

7.2.1 Laboratory Control Samples

Laboratory control samples are matrix equivalent QC check samples (such as analyte-free water) spiked with a known quantity of specific analytes that are carried through the entire sample preparation and analysis process. The spiking solution used for LCS/LCD preparation is of a source different from the stock that was used to prepare calibration standards.

For laboratory sample duplicate analyses, a sample is prepared and analyzed twice. Laboratory sample duplicates are prepared and analyzed with each batch of samples for most inorganic analyses.

Analytical accuracy will be represented by the recovery of the spiked compound in the LCS/LCD. As a general rule, the recovery of most compounds spiked into samples is expected to fall within a range of 65 to 135 percent. The laboratory will have statistically-based control limits for recovery for each method and matrix.

Analytical precision will be evaluated based on the relative percent difference (RPD) of the LCS/LCD pair. The laboratory will have statistically-based control limits for RPD established for each method of analysis and sample matrix.

7.2.2 Surrogate Standards

Organic compound analyses include the addition, quantitation, and recovery calculation of surrogate standards. Compounds selected to serve as surrogate standards must meet all of the following requirements:

- Are not the target analytes
- Do not interfere with the determination of target analytes
- Are not naturally occurring, yet are chemically similar to the target analytes
- Are compounds exhibiting similar response to target analytes

Surrogate standards are added to every analytical and QC check sample at the beginning of the sample preparation. The surrogate standard recovery is used to monitor matrix effects and losses during sample preparation. Surrogate standard control criteria are applied to all analytical and QC check samples, and if surrogate criteria are not met, re-extraction and reanalysis may be performed.

Analytical accuracy will be also evaluated based on the surrogate standard recovery. The laboratory will have statistically-based control limits for RPD established for each method of analysis and sample matrix. The surrogate standard control limits typically range from 65 to 135 percent for all organic analyses. For paint samples, surrogate standard recovery may not be evaluated due to extract dilution during analysis.

7.2.3 Method Blanks

A method blank is used to monitor the laboratory preparation and analysis for interferences and contamination from glassware, reagents, sample handling, and from the general laboratory environment. A method blank is carried through the entire sample preparation and analysis process, and is included with each batch of samples. Some methods of inorganic analysis do not have a distinctive preparation step. For these tests, an instrument blank, which contains all reagents used with samples, is considered to be the method blank.

7.2.4 Reporting Limits

The laboratory will determine the detection limits for each method, instrument, analyte, and matrix by using the procedure described in 40 Code of Federal Regulations Part 136, Appendix B or another scientifically valid and documented procedure. The detection limit is defined as the smallest analyte concentration that can be demonstrated to be different from zero or a blank concentration at the 99 percent level of confidence. The detection limit for wipe samples will be below 1 microgram per 100 square centimeters.

The limit of detection (LOD) is the smallest amount or concentration that must be present in a sample in order to be detected at a 99 percent confidence level. The LOD is typically two to four times the detection limit. The limit of quantitation (LOQ) is the lowest concentration of a substance that produces quantitative result within specified limit of precision and accuracy; usually set at or above the concentration of the lowest calibration standard.

Once the LOQs have been established, laboratories use them as routine reporting limits in the analysis of interference-free, undiluted samples. The LOQs, however, are highly matrix-dependent and their values increase with sample dilution. Higher reporting limits are expected for samples with matrix interferences such as paint. The LOQs provided by the laboratory will be reviewed to determine whether they are sufficiently low to support project decisions.

8. SAMPLE MANAGEMENT

8.1 SAMPLE CONTAINERS, PRESERVATION, AND HOLDING TIME

Sample containers will be 4-ounce glass jars with a Teflon-lined lid for solids and wipes or 40-ml vials for oil. The containers provided by the laboratory will be pre-cleaned by the manufacturer according to the EPA requirements. Sample temperature preservation will include storage and transportation at ≤6 degrees Celsius. The holding time for analysis will be 14 days; extracts will be analyzed within 40 days.

8.2 SAMPLE NUMBERING AND LABELING

Samples will be uniquely designated using a numbering system that identifies a sampling point and a sample. The numbering system will be as follows: sample type (e.g., OIL for samples of oil, W for bare metal wipe samples, P for paint samples from painted metal), consecutive drum number or stockpile number, consecutive sample number, and in the case of composite samples, a final number to identify samples that will be composited in the laboratory . For example, OIL-001 will be a sample of oil from the first equipment item that is sampled and will be the first sample collected for the Phase 1 equipment removal project. Similarly, W-1-005 will be a wipe sample collected from bare metal surfaces in stockpile one and will be the fifth sample collected. Sample number P-6-024-01 through P-6-024-05 will be 5 point composite paint sample from stockpile 6 and would be the 24th sample collected during the project.

Sample labels will be affixed to each sample container; non-waterproof labels will be covered with clear tape prior to sampling. Sample labels may be preprinted or prepared in the field. The following information will be recorded on the sample label:

- Project name
- Sample identification number
- Analysis to be performed
- Sampler's initials
- Sample collection date (month/day/year)

- Time of start of the sampling (24-hour clock)

8.3 SAMPLE CUSTODY

A sample is under custody, if one or more of the following criteria are met:

- It is in the sampler's possession
- It is in the sampler's view after being in possession
- It is in a designated secure area

In addition to providing a custody exchange record for the samples, the COC form serves as a formal request for sample analyses. Figure 5 includes an example of a COC form that may be used for the project. The COC form lists each sample, the required analyses, and the individuals or organizations performing the sample collection, shipment, and receipt. Sample custody will be the responsibility of the Weston field crew from the time of sample collection until the samples are accepted by the laboratory courier service for delivery to the laboratory or until the samples are accepted for shipment by a commercial courier. Thereafter, the laboratory performing the analysis will maintain custody.

The COC form will be the controlling document to assure that sample custody is maintained. Sampling personnel will complete the COC form prior to transferring samples to the laboratory either by courier service or by overnight delivery service. Each time the sample custody is transferred to a different organization, the former custodian will sign the COC on the "Relinquished By" line, and the new custodian will sign the COC on the "Received By" line. The date, time and company affiliation will accompany each signature. The laboratory will immediately notify Weston personnel if the event the COC is broken. Weston will make a decision as to the fate of the sample(s) in question on a case-by-case basis. The sample(s) will either be processed "as-is" with custody failure noted along with the analytical data or rejected with resampling scheduled, if necessary. The non-conformance associated with the samples will be noted on the appropriate certificate or analysis or in a case narrative.

The COC forms will be completed, signed, and distributed as follows:

- One copy retained by the Weston sample coordinator

- The original sent to the analytical laboratory with the sample shipment

After the laboratory receives the samples, the laboratory sample custodian will inventory each shipment before signing for it and note on the Cooler Receipt Form any discrepancy in the number of samples, temperature of the cooler or broken samples. The laboratory will immediately notify Weston personnel of any problems identified with the shipped samples in order to determine the appropriate course of action.

8.4 SAMPLE PACKING AND SHIPMENT

Samples to be shipped by commercial courier will be packed in sample coolers. A temperature blank will be placed in every cooler. All sample containers will be protected with bubble wrap. Ice, double-bagged in resealing bags, will be added to the cooler in sufficient quantity to keep the samples at ≤6 degrees Celsius for the duration of the shipment to the laboratory. Sample cooler drain spouts will be taped from the inside and outside of the cooler to prevent any leakage.

The COC form will be sealed in a plastic bag, and the bag will then be taped to the inside of the sample cooler lid. If several sample coolers are shipped, all of the COC forms will be enclosed in one cooler and the total number of coolers indicated in the COC form. The cooler will be taped shut with strapping tape. The samples will be shipped to the analytical laboratory by overnight delivery service. A copy of the courier shipping company waybill and copies of the COC forms will be retained for project records. Saturday deliveries will be coordinated with the laboratory.

If samples are picked up by a laboratory courier service, sample containers in resealing bags will be placed in coolers with ice. A temperature blank will be placed in every cooler. The COC form will be completed and signed by the laboratory courier as the custody

8.5 FIELD DOCUMENTATION

Field documentation will include a Field Logbook, and preprinted COC forms. A Field Logbook with consecutively numbered pages will be assigned to this project. All entries will be recorded in indelible ink. At the end of each workday, the responsible sampler will cross out, sign, and date any unused portions of the logbook page last used. If it is necessary to transfer the logbook

to another person, the person relinquishing the logbook will sign and date the last page used, and the person receiving the logbook will sign and date the next page to be used.

At a minimum, the Field Logbook will contain the following information:

- Project name and location (on the first page only)
- Date and time
- Personnel in attendance
- General weather information
- Field observations, if any
- Sampling performed
- Identification of field QC samples
- Descriptions of deviations from the SAP, if any
- Problems encountered and corrective action taken, if any

9. DATA MANAGEMENT

All analytical data generated by the laboratory will be reviewed prior to reporting to assure their validity. This internal laboratory data review process will consist of data reduction, several levels of documented review, and reporting. Review processes will be documented using appropriate checklist forms, or logbooks, that will be signed and dated by the reviewer.

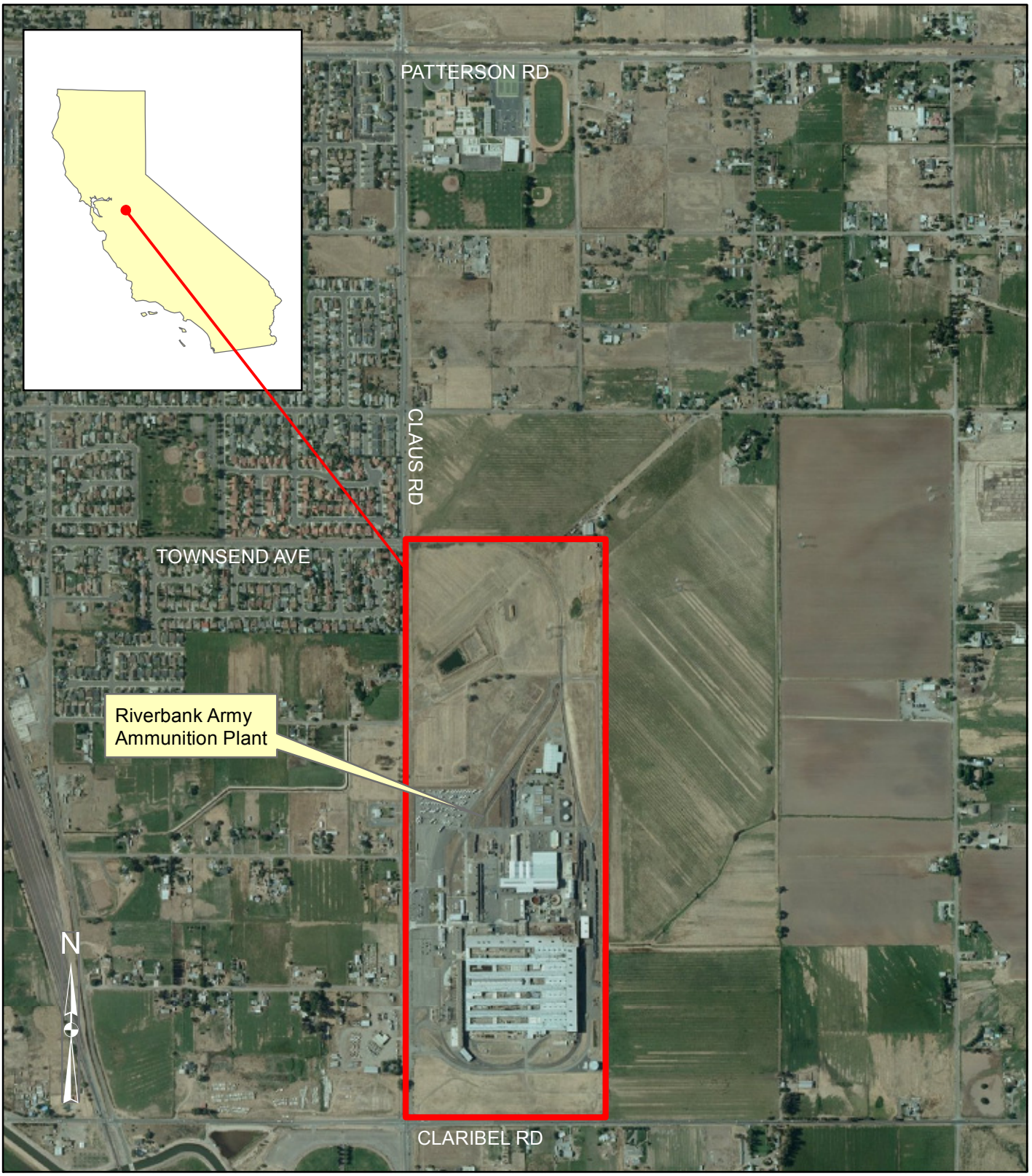
Data reduction involves the mathematical or statistical calculations used by the laboratory to convert raw data to the reported data. Reduction of analytical data will be performed by the laboratory as specified in each of the appropriate analytical methods and the laboratory standard operating procedures. For each method, all raw data results will be recorded using method-specific forms or a standardized output from each of the various instruments.

The laboratory analyst who generates the analytical data will have the primary responsibility for the correctness and completeness of data. Each step of this verification and review process will involve the evaluation of data quality based on both the results of the QC data and the professional judgment of those conducting the review. This application of technical knowledge and experience to the evaluation of data is essential in ensuring that data of known quality are generated consistently. All data generated and reduced will follow well-documented in-house protocols.

Hard Copy Deliverables—All relevant raw data and documentation, including (but not limited to) logbooks, data sheets, electronic files, final reports, *etc.*, will be maintained by the laboratory for at least seven years. All data packages data will be Level III. The data packages will be reviewed by a Weston data reviewer to establish with the data quality objectives were met.

Electronic Deliverables—The electronic data deliverable (EDD) will be in Weston-specific file format. The laboratory will certify that the EDD and the hard copy reports are identical. Both the EDD and the hard copy will provide results to two or three significant figures. For inorganic results, two significant figures will be used for results that are less than ten, and three significant figures will be used for results that are greater than ten. For organic results, one significant figure will be used for results that are less than ten, and two significant figures will be used for results that are greater than ten. The EDDs will be uploaded into the Envirodata database.

FIGURES

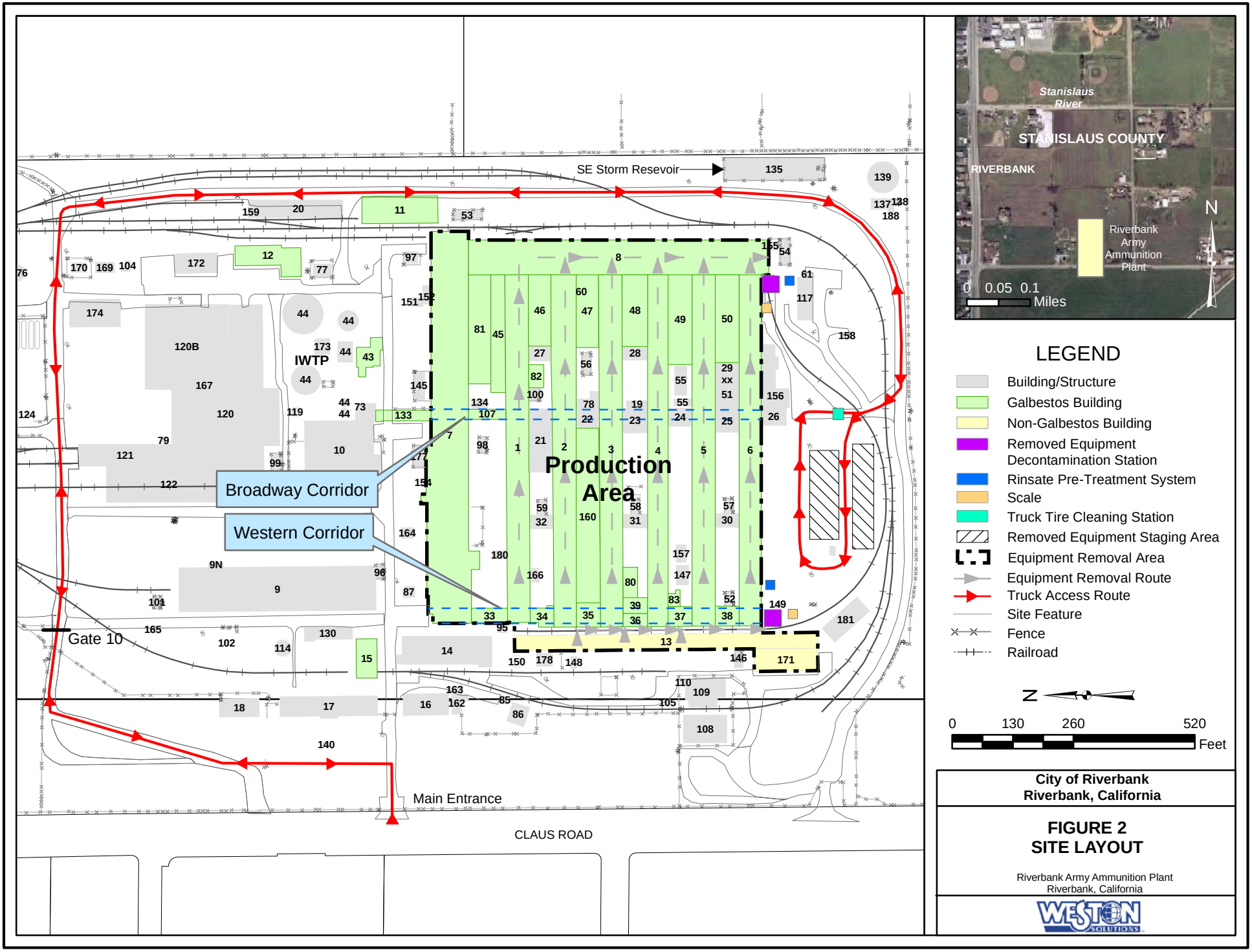


City of Riverbank
Riverbank, California

FIGURE 1
VICINITY MAP

Riverbank Army Ammunition Plant
Riverbank, California

WESTON SOLUTIONS



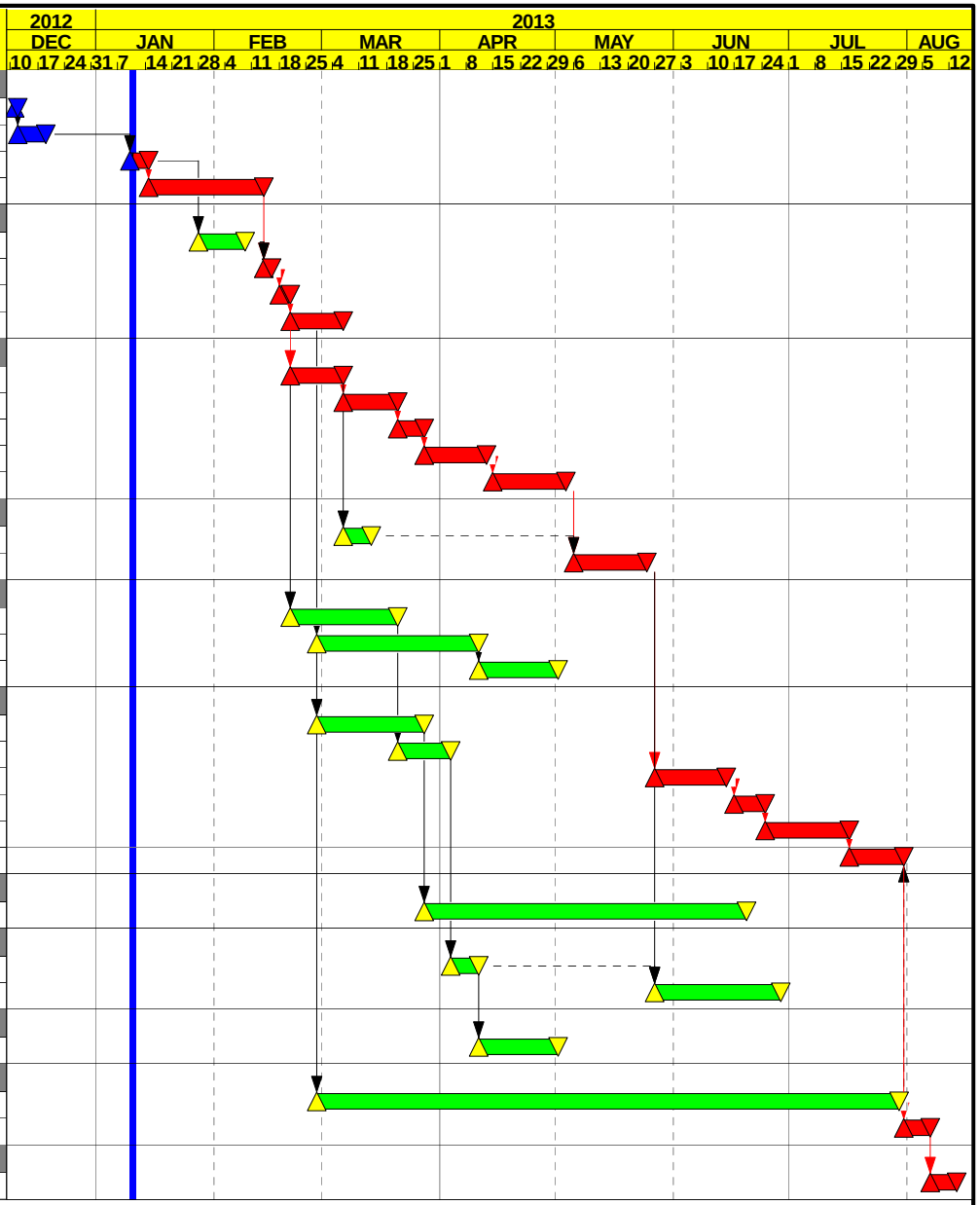
City of Riverbank
Riverbank, California

FIGURE 2
SITE LAYOUT

Riverbank Army Ammunition Plant
Riverbank, California

WESTON SOLUTIONS

Activity ID	Activity Description	Orig Dur	Early Start	Early Finish
SAP				
1.1	SAP Submittal to Army	1	11DEC12A	11DEC12A
1.2	Army Review SAP	7	12DEC12A	18DEC12A
1.3	SAP Revision	3	10JAN13A	14JAN13
1.4	EPA Review/Approval	30	15JAN13	13FEB13
Mobilization				
2.0	Hiring/Training/Procurement	10	28JAN13	08FEB13
3.1	Field Office Setup	2	14FEB13	15FEB13
3.2	Decon Station Setup	3	18FEB13	20FEB13
3.3	Drain Oils from Equipment	10	21FEB13	06MAR13
Building 6				
4.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	10	21FEB13	06MAR13
4.2	Remove Small Plating Line	10	07MAR13	20MAR13
4.3	Remove Rectifiers	5	21MAR13	27MAR13
4.4	Remove Large Plating Line (B156)	12	28MAR13	12APR13
4.5	Remove Oven	15	15APR13	03MAY13
Building 50				
5.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	5	07MAR13	13MAR13
5.2	Remove Ovens	15	06MAY13	24MAY13
Building 13				
6.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	20	21FEB13	20MAR13
6.2	Remove Prodcution Line Equipment	30	28FEB13	10APR13
6.3	Remove Presses	15	11APR13	01MAY13
Building 1				
7.2	Remove Two Presses	20	28FEB13	27MAR13
7.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	10	21MAR13	03APR13
7.3	Remove Oven & Conveyors (West)	15	27MAY13	14JUN13
7.4	Remove Overhead Conveyors	6	17JUN13	24JUN13
7.5	Remove Oven (East)	15	25JUN13	16JUL13
7.6	Remove Overhead Conveyors (East)	10	17JUL13	30JUL13
Building 8				
8.1	Remove Presses	60	28MAR13	19JUN13
Building 171				
9.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	5	04APR13	10APR13
9.2	Remove Production Line	25	27MAY13	28JUN13
Other Buildings & Courtyards				
10.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	15	11APR13	01MAY13
Characterization Sampling & T&D				
11.1	Character. Sampling & T&D (Non-fixed Equip)	107	28FEB13	29JUL13
11.2	Charact. Sampling & T&D (Rinsate)	5	31JUL13	06AUG13
Temporary Facility Removal & Demobilization				
12.1	Temporary Facility Removal & Demob.	5	07AUG13	13AUG13



Start Date 11DEC12
Finish Date 13AUG13

Early Bar
Progress Bar
Critical Activity

RBEQ Sheet 1 of 1

Figure 3 - Riverbank Army Ammunition Plant
Phase 1, Equipment Removal
Project Schedule & Work Sequence

Date	Revision	Checked	Approved

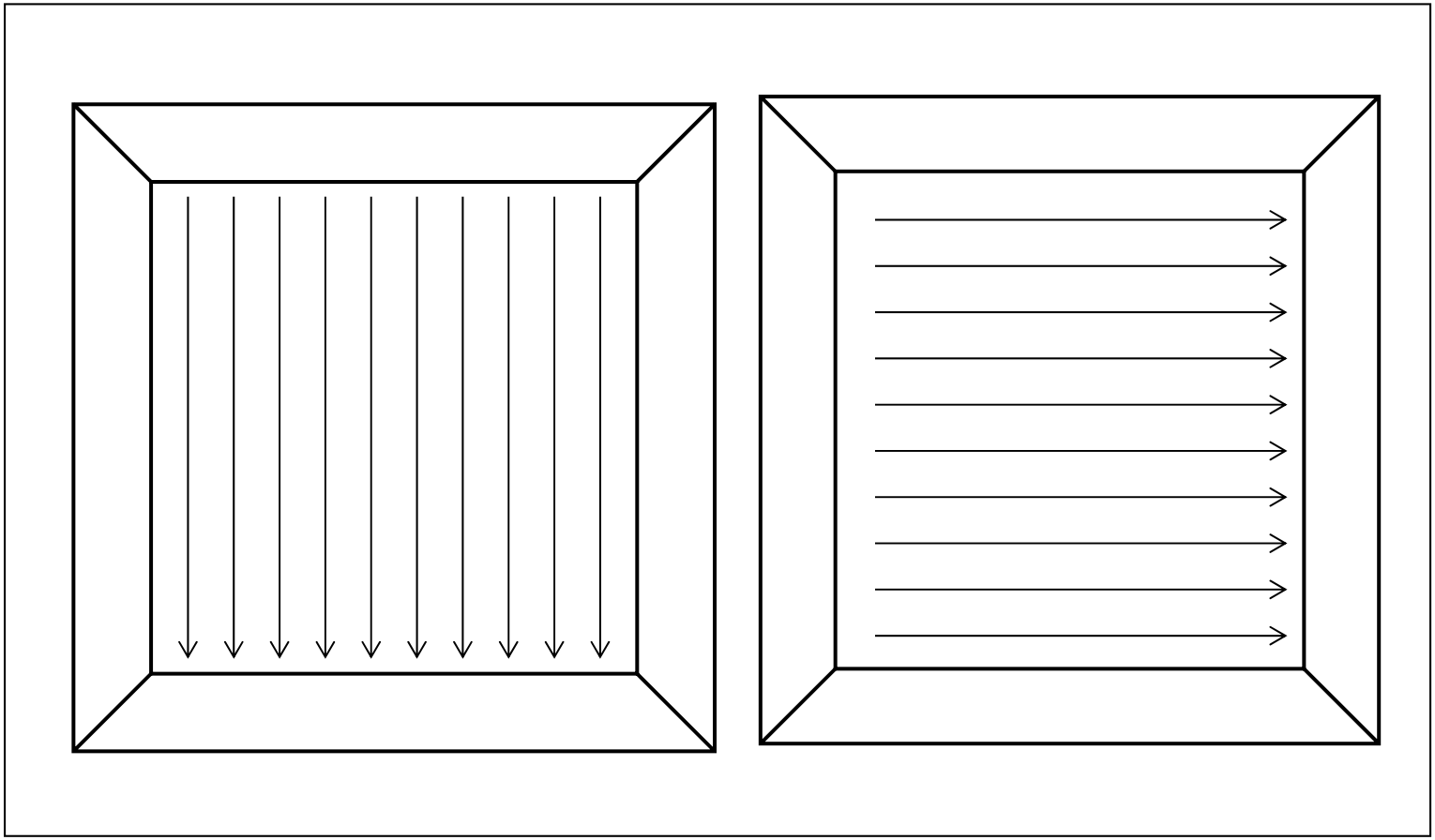


Figure 4 Patterns for Wipe Sampling Using a Template

Figure 5 Example Chain-of-Custody Form

Chain-of-Custody Form

Project Number: 14972.001.001.0100.03	Project Name: Riverbank Army Ammunition Plant						Request for Analysis									Chain of Custody No.:
Sampler's *(Signature)*																Page _ of _
Field Sample ID	Date	Time	Comp.	Grab	Matrix	No. of Containers	PCBs (including 1268) EPA Method 8082									Additional Requirements
Reliquished by: *(Signature and affiliation)*					Date and Time:	Received by: (Signature and affiliation)										Date and Time:
Reliquished by: *(Signature and affiliation)*					Date and Time:	Received by: (Signature and affiliation)										Date and Time:
Reliquished by: *(Signature and affiliation)*					Date and Time:	Received by: (Signature and affiliation)										Date and Time:
Notes: Data package: Level III Turnaround time:																For Laboratory Use Only

APPENDIX A
EPA REGION IX APPROVAL LETTERS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via Electronic and U.S. Postal Service Mail

September 4, 2012

Base Realignment and Closure Division
ATTN: Mr. Warren Switzer
Project Manager Army BRAC-D Office
2530 Crystal Drive Room 500
Taylor Building/NC3
Arlington, VA 22202
warren.h.switzer.civ@mail.mil

Re: Toxic Substances Control Act (TSCA) – Polychlorinated Biphenyls (PCBs)
May 10, 2012 Request for TSCA Risk-Based Disposal and Decontamination Approval
Removal of PCB-Containing Galbestos Siding and Cleanup of Residual Siding Particles
From Building and Equipment Riverbank Army Ammunition Plant (PCB Cleanup
Document) – USEPA R9 Phased Approval

Dear Mr. Warren Switzer:

The U.S. Environmental Protection Agency Region 9 (USEPA) has reviewed the U.S. Army's (Army's) and Local Redevelopment Authority's (LRA) request for a TSCA risk-based PCB cleanup at the Riverbank Army Ammunition Plant in Riverbank, California (RAAP Site). This request is presented in the subject LRA's PCB Cleanup Document (PCD). USEPA is considering the PCD to be the PCB risk-based disposal approval application under 40 CFR 761.61(c) for cleanup of PCBs at the RAAP Site. To expedite the cleanup of the RAAP Site buildings, USEPA is dividing its approval of the work proposed in the PCD (Application) into two phases: (1) Equipment Cleanup and Disposal of PCB Remediation and Bulk Product Wastes (Phase 1 Work); and (2) Building PCB Cleanup, Removal and Disposal of Galbestos, and Disposal of PCB Remediation and Other PCB Containing Wastes (Phase 2 Work).

By this letter, USEPA is approving with conditions the Phase 1 Work consistent with the TSCA regulations for PCBs in 40 CFR 761.61(c). We plan to respond to questions or provide clarifications on this approval during a conference call being scheduled by the LRA for either the week of September 10 or September 18, 2012.

USEPA intends to approve the Phase 2 Work later after the LRA and/or the Army updates its Application (PCD) to make it complete. Therefore, USEPA requests the LRA and/or the Army submits a revised PCD that more fully describes the work to be completed as part of the Phase 2 Work. The current Application does not sufficiently describe this work and establish appropriate risk-based cleanup levels for that cleanup (either derived via a site-specific health risk assessment or application of USEPA's Regional Screening Levels). We will schedule a future conference call to further discuss the submission of an updated PCD and approval of the Phase 2 Work.

In regard to the Phase 1 Work, the PCB contamination of equipment within the RAAP Site has been largely caused by releases from the Galbestos panels (contain PCBs, asbestos, and other contaminants) in the buildings. As such, the building surfaces (e.g., floors, walls, steel frame components) and the equipment where the released PCBs settled are considered PCB remediation waste. Consistent with 40 CFR 761.50(b)(3)(ii) that PCB remediation waste must be cleaned up or disposed of in accordance with the requirements in 40 CFR 761.61.

In regard to the Galbestos panels themselves, they are prohibited and not authorized for use in accordance with 40 CFR 761.20 and 761.30, respectively. The Galbestos panels must be removed and disposed of consistent with 40 CFR 761.62 as PCB bulk product waste. Offsite disposal options for bulk product waste include among others disposal into a TSCA-approved or a RCRA-permitted, or a state permitted municipal solid waste landfill. In the state of California, PCBs are regulated as a hazardous waste and the Galbestos panels would need to be disposed of at a TSCA-approved or RCRA-permitted landfill.

The remainder of this letter contains the terms of approval for the cleanup of PCB-impacted equipment and other personal property items located at the RAAP Site.

Phase 1 Work – USEPA Approval:

Equipment Cleanup and Disposal of PCB Remediation and Bulk Product Wastes

A. General Conditions

1. **July 17, 2012 building contents inventory.** Within 30 days after the date of this letter, the Army and/or LRA must submit a revised inventory of building contents (personal property only)[1] at the RAAP Site clearly identifying each piece of equipment or part and the planned disposition for each piece of equipment or part including and not limited to the following categories: cleanup for distribution in commerce (including reuse at the RAAP and sale to other parties), cleanup for transportation to offsite disposal, cleanup to facilitate disposal via a specific method, and disposal method (e.g., smelter, landfill).

   The inventory shall also indicate, as available, the PCB concentration for each item in the inventory based on adequate characterization sampling and laboratory analysis and the cleanup method to be used. Complete laboratory analysis reports must be made available to USEPA upon request.

   The reuse, salvage, or sale of items (e.g., personal property including equipment, metal parts) currently inside the buildings, once cleaned up, is subject to applicable distribution in commerce prohibitions and use authorizations for PCBs in 40 CFR 761.20 and 40 CFR 761.30, respectively.

[1] The PCD states that an inventory of personal property and photographs were provided to USEPA. However, as the inventory was provided after the LRA's submission of the PCD, this statement in the PCD was not accurate. Moreover, no photographs have been provided.

2. **Equipment, items, and materials not covered by this approval.** This approval does not cover materials such as painted and unpainted wood, painted and unpainted plastics, rubber (including tires), cardboard, ceramic, fiberglass, pallets, office equipment (e.g., typewriter), furniture with cloth (e.g., chair), furnishings (e.g., desks, chairs) and any other items, equipment, or materials that may be impractical to clean up to effectively remove PCBs. Materials or items not covered by this approval must be tested for PCBs and if PCBs are detected in these materials then disposed in accordance with applicable TSCA regulations as well as state and local regulations.

3. **Sampling and analysis plan (SAP).** Within 30 days after the date of this letter, the Army and/or LRA must submit for USEPA approval a SAP that is responsive to the conditions of this approval.

   The SAP must include clear data quality objectives applicable to the RAAP Site and specific to PCBs. In addition and among other information, the SAP must propose the number and types of samples that will be collected consistent with the conditions of this approval, extraction and analysis methods to be used including detection limits, PCB-extract cleanup methods to be applied before analysis of the extracted sample, duplicate samples, laboratory quality control samples (such as surrogate recoveries with a minimum acceptance criteria of 65%, matrix spike and matrix spike duplicates, and method blanks), sampling methods for paint or other coatings on non-porous surfaces that must be sampled, and corrective actions that will be taken by the laboratory when problems are encountered during analysis or preparation of the samples for analysis that are likely to affect data quality. The number and types of samples to be collected must be cross referenced to the items listed in the revised building contents inventory being required in Condition A.1.

   The SAP must include sampling methods for characterization of paint or other coating on metal surfaces that will be disposed at an offsite facility (e.g., smelter, metal recovery oven, landfill). The TSCA regulations specify that extraction of PCBs from non-liquid samples be conducted using either USEPA SW-846 Method 3550B (sonication) or Method 3540C (Soxhlet) before analysis via USEPA SW-846 Method 8082A or latest revision. Based on data quality, performance, and types of materials to be tested, the Soxhlet extraction (Method 3540C) must be used for extraction of PCBs from the sample. USEPA is willing to further discuss the choice of PCB extraction method with the Army and/or LRA.

   Further, the SAP must include the revised inventory required in Condition A.1 above.

B. <u>Specific Conditions</u>

1. **Equipment proposed for reuse.**

   a. **Coating on metal equipment (Coated non-porous surfaces).** USEPA is approving cleanup of metal equipment and/or metal parts coated with porous surfaces such as paint under 40 CFR 761.61(c) using procedures (such as abrasive blasting/NACE #2) to effectively remove all the paint and PCB contamination from the coated non-porous surface. Cleanup verification sampling must be conducted as required below under "Cleanup verification (testing)." In addition, the Army and LRA must keep records for at least three years of pre- and post-cleanup photographic documentation. A copy of such records must be included in the final PCB cleanup report.

Pieces of equipment and/or metal parts cleaned up consistent with this condition must be tested via wipe standard tests (as defined in 40 CFR 761.123) to demonstrate that PCBs do not remain on the equipment and/or metal after cleanup. Therefore, the items in the inventory should be divided into groups of similar kinds of equipment or parts based on construction materials, size, functionality, or type of use. Pieces of equipment and/or parts are referred to below as items.

Cleanup verification (testing). Visual inspection in conjunction with testing is required for cleanup verification. The items in the Initial, Second, and Third Subgroup discussed below must be selected at random.

A minimum of 10% of items (Initial Subgroup) in each group must be tested as indicated above after cleanup of the equipment. If PCBs are not detected in any item comprising the Initial Subgroup, then no additional testing is needed for that group of items. If PCBs are detected in any item in the Initial Subgroup, a second 10% of items (Second Subgroup) not yet tested and remaining in the group must be tested via wipe samples. If no PCBs are detected in all of the Second Subgroup items, then only the Initial Subgroup items that failed the wipe tests need to be re-cleaned. If PCBs are detected in any of the Second Subgroup items, then all remaining equipment must be re-cleaned in addition to the items in the Second Subgroup that failed the wipe tests; and a minimum of 20% of the re-cleaned items (Third Subgroup) must be tested via wipe tests.

In reference to the cleanup verification (testing) required above, if the Army and/or LRA cannot verify that potential end users of pieces of equipment and/or parts that may be distributed in commerce excludes sensitive subgroups, then USEPA must assume that sensitive receptors may come into physical contact with certain pieces of equipment and/or parts. Based on this uncertainty, USEPA is requiring that wipe samples be analyzed at a laboratory using an analytical method detection limit equal to or less than 1 ug/100 cm sq. Analytical results for the individual testing required above would have to be non-detect for unrestricted use.

If the Army and/or LRA, however, can verify the end use of pieces of equipment and/or parts from the RAAP will be restricted to industrial or commercial use, then the analytical results for the individual testing required above would have to be less than 10 ug/100 cm sq.

The paint or other coatings on pieces of equipment and/or metal parts may contain PCBs. The following scenarios are provided to facilitate disposal of paint that will be removed from pieces of equipment and/or metal parts.

Paint manufactured with PCBs and at time of removal from the items (e.g., via abrasives) and based on the paint analysis, the paint contains PCBs above or equal to 50 mg/kg. This also applies to lead-based paint which in many instances has been found to contain PCBs. In addition to have been manufactured with PCBs, the paint may also be contaminated by PCB sources at the RAAP such as Galbestos dust. After removal from the equipment, the paint must be disposed of as a PCB bulk product waste in accordance with 40 CFR 761.62. If this interpretation changes, we will discuss such changes with the Army and LRA. Abrasives mixed with the paint

must be disposed of as PCB remediation waste consistent with 40 CFR 761.61(a)(5). Waste lead-based paint that also contains PCBs and it is removed from equipment and/or metal parts must be disposed of in accordance with the most stringent requirements for this waste.

Paint not manufactured with PCBs and at time of removal and based on analysis of the paint, the paint contains PCBs at levels below 50 mg/kg. The PCBs in the paint may be due to contamination via Galbestos or other PCB sources at the RAAP. After removal from equipment and/or metal parts, the paint must be disposed of as a PCB remediation waste under 40 CFR 761.61(a)(5). Abrasives or other materials used to remove the paint must be disposed as a PCB remediation waste consistent with 40 CFR 761.61(a)(5).

b. **Uncoated metal equipment and bare metal (Uncoated non-porous surfaces).** USEPA is approving the use of abrasive blasting for cleanup of uncoated non-porous surfaces contaminated with Galbestos dust (non-liquid PCBs). The Army/LRA may also use kerosene, diesel fuel, terpene hydrocarbons, mixtures of terpene hydrocarbons, and terpene alcohols to cleanup pieces of equipment, parts of pieces of equipment, and/or metal parts that are not amenable to cleanup via abrasive blasting. Solvents different than those listed here may be used for this purpose, however, the PCBs must have a minimum solubility of 5% in those solvents; and chlorinated solvents are excluded. The Army / LRA must identify and notify USEPA of the alternate solvent that will be used within at least 5 days before starting the cleanup. Cleanup verification testing consistent with Condition B.1.a above must be performed to demonstrate effectiveness of the cleanup.

2. **Equipment proposed for disposal at an offsite facility.**

a. **Preparation of equipment for transportation to offsite disposal facility.** The Army proposes to "wipe down with a solvent" painted equipment and other equipment contaminated with Galbestos dust before transportation for disposal. Under 40 CFR 761.61(c), USEPA is approving the use of solvents to remove Galbestos dust and other PCB containing material (e.g., dirt, debris) from equipment or parts to prevent potential releases of PCBs into the environment and transportation vehicles during transportation.

The disposal of any piece of equipment that meets the definition of a PCB Item in 40 CFR 761.3 must be conducted in accordance with the disposal requirements for that PCB Item stipulated in 40 CFR 761 Subpart D. In addition, the Item must be prepared for transportation to disposal consistent with Subpart D and this condition.

3. **Equipment or parts for disposal in a smelter or scrap metal recovery oven.**

a. **Metal surfaces (e.g., equipment, parts) in contact with non-liquid PCBs (e.g., paint containing PCBs).** These metal surfaces may be disposed of in a scrap metal recovery oven or a smelter subject to the conditions established below.

Conditions.

1. The scrap metal recovery oven or the smelter must be operating in compliance with the requirements in 40 CFR 761.72 and the concentration of non-liquid PCBs in contact with the metal surfaces must be less than 500 ppm (as measured by bulk paint samples). Metal recovery ovens and smelters compliant with 40 CFR 761.72 requirements may not be available in USEPA R9.

2. If the PCB concentration of the non-liquid PCB in contact with the metal surfaces (e.g., equipment or parts) is equal to or above 500 ppm (as measured by analysis of bulk paint samples), the metal surfaces must be cleaned up first in a scrap metal recovery oven operating consistent with 40 CFR 761.72(a) or cleaned up to a surface concentration of less than 100 ug/100 cm^2 (less than 500 ppm) before smelting. Collection and analysis of wipe and bulk paint samples must be performed after cleanup and prior to smelting to ensure the requirements of this condition are met.

3. Representative sampling of the non-liquid PCB (e.g., paint) in contact with the metal surfaces must be conducted in addition to wipe samples to confirm the PCB concentration before disposal via smelting or scrap metal recovery oven.

4. **Tenant equipment inside buildings contaminated with Galbestos dust.**

   a. **Testing and cleanup of tenant equipment.** The scope of the Phase 1 Work is hereby expanded to include testing of tenant-owned equipment located within buildings contaminated with Galbestos dust. This condition modifies the PCD to include this additional work. The Army and/or the LRA shall test such equipment consistent with Condition B.1.a and the sampling and analysis plan (SAP) required in Condition A.3 (Sampling and analysis plan) after approval by USEPA. Tenant equipment and parts found to be contaminated with PCBs due to Galbestos dust or other PCB sources at the RAAP must be cleaned up consistent with the conditions of this approval.

5. **Determining PCB concentration for offsite disposal; land disposal of PCB remediation and PCB bulk product waste; decontamination wastes and residues.**

   a. **Painted materials and equipment. Condition.** Refer to Condition A.3.

   b. **Bare metal and metal equipment. Comment.** Collection and analysis of wipe samples from bare metal parts and equipment may be necessary to determine appropriate offsite disposal option.

6. **Land disposal of PCB remediation and PCB bulk product wastes.**

   a. **Clarifications.** The state of California regulates liquid and non-liquid wastes containing PCBs as a hazardous waste depending on the PCB concentration. Non-liquid wastes containing PCBs equal to or above 50 ppm are regulated for disposal at a RCRA hazardous waste landfill. Wastes

containing PCBs at 50 ppm or greater concentration cannot be disposed in municipal solid waste landfills in California.

Galbestos siding that will be removed for disposal under Phase 2 Work activities is a PCB bulk product waste and disposal of such waste is regulated under 40 CFR 761.62 and not under 40 CFR 761.61(b), which provides additional options for disposal of PCB remediation waste.

7. **Decontamination waste and residues.** Decontamination wastes and residues must be characterized for disposal and disposed of in accordance with the requirements in 40 CFR 761.79(g).

8. **Sequence of equipment cleanup.**

   a. **Condition.** Within 30 days after the date of this letter, provide the sequence for cleanup of personal property including how materials and equipment will be relocated to the areas where it will be cleaned up, locations where the cleanup will be performed, and locations and storage methods for cleaned up materials and equipment. In addition, explain measures that will be taken to prevent recontamination of equipment and/or parts, and contamination of areas due to Galbestos that are not currently contaminated.

9. **Oil-filled equipment.**

   a. **Condition.** Within 30 days after the date of this approval, please submit the following information:

      1. An inventory of oil-filled equipment at the RAAP describing the type of equipment and/or part, current status of equipment (e.g., in service, out of service but in storage), projected disposition of the equipment, PCB concentration (i.e., Aroclor and concentration) for each piece of equipment tested, and supporting laboratory analysis results associated with each piece of equipment and/or part.

      2. The most current laboratory analysis results for the oil from two presses with hydraulic fluid that according to the PCD remain at the RAAP. Based on the PCD the oil inside these presses was changed out about twenty years ago.

      3. Records for oil filled equipment (including electrical equipment) at the RAAP from which PCB-containing oil has been drained and replaced with other oil.

10. **Limitation of exposure and control of releases.** The Army / LRA must conduct all Phase 1 Work in a manner that is protective of workers, the public, and the environment. Decontamination of sampling equipment and tools must be in accordance with 40 CFR 761.79(c)(2).

11. **Sampling and recordkeeping.** The Army / LRA must maintain records of sampling activities and analysis results associated with sampling to demonstrate that cleanup objectives have been met. The Army / LRA is responsible for compliance with all applicable federal, state, and local regulations

during decontamination, movement, relocation, transportation, and disposal of materials and equipment contaminated with PCBs and currently located at the RAAP.

USEPA appreciates the opportunity to being of assistance to the US Army and LRA concerning PCBs at the RAAP. If you have any questions concerning this approval, please call Carmen D. Santos at 415.972.3360.

Sincerely,

Jeff Scott, Director
Waste Management Division

Cc Via Electronic Mail Only

James McCallister, US Army Corp of Engineers
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via U.S. Postal Service and Electronic Mail

October 29, 2012

Base Realignment and Closure Division
ATTN: Mr. Warren Switzer
Project Manager Army BRAC-D Office
2530 Crystal Drive Room 500
Taylor Building/NC3
Arlington, VA 22202
Warren.h.switzer.civ@mail.mil

Re: Polychlorinated Biphenyls (PCBs), Toxic Substances Control Act (TSCA) – Amendment 1 to USEPA R9 Phase 1 Approval of U.S. Army / LRA PCB Cleanup Document – Riverbank Army Ammunition Plant, Riverbank, California

Dear Mr. Warren Switzer:

Thank you for your electronic mail (e-mail) messages (attached) dated September 27, 2012 and September 19, 2012. Those messages requested the U.S. Environmental Protection Agency Region 9 (USEPA) to amend several conditions in its September 4, 2012 Phase 1 Approval of the U.S. Army (Army) and Local Redevelopment Authority's (LRA's)[1] PCB Cleanup Document (PCD)[2]. In this letter, USEPA is modifying and/or clarifying several of its conditions in that Approval in response to your request. Therefore, this letter serves as Amendment 1 to USEPA's September 4, 2012 Phase 1 Approval. Cleanup of PCBs is being conducted at the Riverbank Army Ammunition Plant (RAAP).

This Amendment is based on USEPA's September 14, 2012 e-mail message (attached) summarizing preliminary responses to the Army's request for an amendment to the Phase 1 Approval.[3] Furthermore, the Army/LRA and USEPA discussed the requested amendments and USEPA's preliminary response during our conference call and meeting on September 13 and 20, 2012, respectively.

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[1] The LRA is the City of Riverbank.
[2] The PCB Cleanup Document (PCD) is the "Request for TSCA Risk-Based Disposal and Decontamination Approval Removal of PCB-Containing Galbestos Siding and Cleanup of Residual Siding Particles from Building and Equipment Riverbank Army Ammunition Plant" dated May 10, 2012.
[3] September 14, 2012 message sent at 3: 00 PM to the Army (James P. McAllister) and LRA's consultant (John Woodyard, Weston Solutions).

Mr. Warren Switzer
Re: Riverbank Army Ammunition Plant
USEPA Amendment 1, Phase 1 Approval
October 29, 2012

USEPA Amendment 1, Phase 1 Approval - Army/LRA PCD for the RAAP

The conditions in this approval do not replace or supersede the conditions in the September 4, 2012 Phase 1 Approval unless specified below.

1. **Amendment to Condition A.2 (Equipment, items, and materials not covered by this approval).** In accordance with 40 CFR 761.61(a)(5)(B)(2)(ii) instead of conducting sampling of the waste, a cleanup party may assume the waste contains PCB concentrations above 50 mg/kg total PCBs. This assumption is made in reference to PCB bulk remediation waste. Under 40 CFR 761.61(c), USEPA is allowing the application of this assumption to disposal of porous surfaces (e.g., concrete, wood) and cleanup wastes. This assumption is not applicable to non-porous surfaces and non-porous surfaces that are coated. Porous surfaces, non-porous surfaces, and cleanup wastes are types of PCB remediation wastes.

   If the Army/LRA plans to dispose non-porous surfaces via a smelter or recovery oven the waste must be sampled to determine the actual PCB concentration. Sampling and analysis of the waste is necessary for smelter compliance with the requirements in 40 CFR 761.72. See Condition 3, September 4, 2012 Phase 1 Approval.

   Items not covered under this approval and that do not meet the definition of PCB remediation waste are subject to the applicable disposal requirements in other sections of the PCB regulations in Subpart D and any state and local regulations that may apply.

2. **Amendment to Deadlines in Conditions A.1 (July 17, 2012 building contents inventory), A.3 (Sampling and analysis plan), B.8 (Sequence of equipment cleanup), and B.9 (Oil-filled equipment).** The Army / LRA have proposed to submit the deliverables in (1) Conditions A.1 and A.3 within 30 days, (2) Condition B.8 within 45 days, and (3) Condition B.9 within 60 days after the date of the September 20, 2012 meeting.

   USEPA is modifying the deliverable schedule for Conditions A.1, A.3, B.8, and B.9 as established in the table below.

September 4, 2012 Conditions of Approval	USEPA Original Schedule	USEPA Revised Schedule
A.1, July 17, 2012 Building contents inventory.	Within 30 days after 09/04/2012 approval.	Within 60 days after 09/20/2012 meeting.
A.3, Sampling and analysis plan.	Within 30 days after 09/04/2012 approval.	Within 60 days after 09/20/2012 meeting.
B.8, Sequence of equipment cleanup.	Within 30 days after 09/04/2012 approval.	Within 60 days after 09/20/2012 meeting.
B.9, Oil-filled equipment.	Within 30 days after 09/04/2012 approval.	Within 90 days after 09/20/2012 meeting.

In addition, USEPA clarifies that Condition B.9 (Oil-filled equipment) applies to both personal and real property items within the RAAP.

3. **Amendment to Condition A.3 in relation to extraction method.** The TSCA PCB regulations in 40 CFR 761.272 require the use of either the Soxhlet or Ultrasonic extraction Methods 3540C or 3550B, respectively. However, both extraction methods may not be equally effective in extracting PCBs from certain matrices such as soils and solids. The latest revision of the Ultrasonic extraction method is Method 3550C. The Scope and Application section of that method states that:

> ". . . Because of the limited contact time between the solvent and the sample, ultrasonic extraction may not be as rigorous as other extraction methods for soils/solids."

USEPA believes that Soxhlet extraction may be a more efficient extraction method for bulk product than Ultrasonic extraction. USEPA will evaluate the results of surrogate recoveries and other laboratory quality control samples in context to the matrix being analyzed. If the Army / LRA prefer the ultrasonic extraction (EPA Method 3550C), submit a side-by-side comparison of analytical results for a limited number of bulk product samples analyzed via USEPA Method 8082A after extracted via Ultrasonic and Soxhlet methods.

4. **Amendment to Condition B.1.a (Coating on metal equipment [Coated non-porous surfaces]).** USEPA is amending this condition to add the use of chemical strippers to remove paint from certain items (e.g., large hydraulic presses) that would be damaged or their mechanical parts be compromised by the use of abrasives to remove the paint. The testing required in Condition B.1.a must be conducted. The Revised Inventory required in Condition A.1 of USEPA's Phase 1 Approval must indicate which items in that Inventory will be subject to chemical stripping and abrasives.

   In addition, spent stripper and/or spent abrasives (cleanup residues) can be temporarily stored in containers at the cleanup site that meet DOT requirements for PCB containing waste. The waste must be stored in a manner that prevents releases to the environment. Such containerized waste must be transported to the selected off-site disposal facility within 30 days after waste generation.

   The concentration for disposal of cleanup residues must be based on analysis of the actual waste. The Army/LRA may assume the cleanup residues contain PCBs at levels equal to or above 50 mg/kg and shall dispose of the waste consistent with the requirements for disposal of PCBs at that concentration. Disposal of liquid PCB remediation waste must be in accordance with the requirements in 40 CFR 761.61(b).

5. **Amendment to Condition B.2.a (Preparation of equipment for transportation to offsite disposal facility).** This Condition already allows the use of solvents to "wipe down" equipment or items planned for transportation offsite. USEPA is amending Condition B.2.a

to allow the use of vacuuming to clean and detergent to "wipe down" items at the RAAP identified for offsite disposal in the Revised Inventory required in Condition A.1. However, the Army / LRA must describe in the Inventory the disposal method for the generated cleanup waste (e.g., vacuumed dust, vacuum cleaner parts not amenable to decontamination). Methods to decontaminate the vacuum cleaner and associated parts that contacted PCBs must also be included in the inventory.

The use of pressure washing is not a preferred alternative due to the large volumes of waste that would be generated and need for proper containment of the water during cleanup of items or equipment.

However, USEPA is allowing pressure washing under the condition that:
(a) A minimum volume of water is used for pressure washing,
(b) The containment system be demonstrated not to leak and to be of a capacity large enough to contain all the water being used for cleanup (including photos of such containment), and
(c)The water be tested for PCBs to determine the applicable disposal method.

If water from pressure washing activities will be treated onsite at the RAAP, the Army/LRA must propose the treatment method that will be used for USEPA approval. Filtration of the water is allowed under the current regulations. The spent filtration media would be subject to disposal under the TSCA PCB regulations.

6. **Condition B.3.a (Metal surfaces [e.g., equipment, parts] in contact with non-liquid PCBs (e.g., paint containing PCBs).** Sampling methods for disposal of PCB waste must be included in the SAP requested in Condition A.3. The approach to conduct sampling required in Condition B.3a must be described in the SAP. The September 4, 2012 Approval covers cleanup and disposal of "items" (defined in the Approval to include equipment and materials) at the RAAP. Decisions to dispose of certain items via a smelter or recovery oven must be supported by proper sampling and analysis of the waste. Disposal via a smelter must be supported by proper sampling of items that will be subject to that type of disposal. The Army / LRA may consult with the smelter or recovery oven facility of their choosing on waste sampling methodology when drafting the SAP required in Condition A.3.

7. **Condition B.4.a (Testing and cleanup of tenant equipment).** This Condition remains as established in the September 4, 2012 Phase 1 Approval. However, USEPA clarifies that cleanup of fixed tenant equipment can be conducted under the future Phase 2 Approval.

8. **Condition B.6 (Land disposal of PCB remediation and PCB bulk product wastes). Clarification.** PCB remediation wastes with a total PCB concentration of less than 50 mg/kg must be disposed consistent with the requirements in 40 CFR 761.61(a)(5). Disposal requirements are established in that section of the regulation for each type of PCB remediation waste.

In addition to the above, USEPA clarifies that under 40 CFR 761.61(c), sampling and cleanup of PCBs must be conducted in accordance with plans approved by USEPA. Depending on circumstances, storage for disposal and disposal of PCBs may also need prior approval from USEPA.

USEPA appreciates the opportunity to assist the Army/LRA on the PCB matters associated with the Riverbank Army Ammunition Plant. If you have any questions concerning the amendments to the Phase 1 Approval, please call Carmen D. Santos at 415.972.3360. Thank you for your cooperation.

Sincerely,

for Jeff Scott, Director
Waste Management Division

Enclosures (3)

Cc Via Electronic Mail Only

James P. McAllister, USACOE
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Mr. Warren Switzer
Re: Riverbank Army Ammunition Plant
USEPA Amendment 1, Phase 1 Approval
October 29, 2012

Steve Armann, USEPA R9 - WMD
Armann.steve@epa.gov

Carmen D. Santos, USEPA R9 - WMD
Santos.carmen@epa.gov

PCBs: Riverbank Army Ammunition Plant - Follow Up to September 13, 2012 Conference Call
Carmen Santos
to:
James.p.mcalister, John.Woodyard
09/14/2012 03:08 PM
Cc:
DOlson, Carmen Santos
Hide Details
From: Carmen Santos/R9/USEPA/US
To: James.p.mcalister@usace.army.mil, John.Woodyard@WestonSolutions.com,
Cc: DOlson@riverbanklra.org, Carmen Santos/R9/USEPA/US@EPA
Hello James and John:

Thank you for the dialogue that we had via conference call on September 13, 2012 regarding the Army / LRA's comments on certain conditions in EPA's September 4, 2012 PCB cleanup approval under 40 CFR 761.61(c) (Approval) for equipment at the RAAP. I understand the Army / LRA may formally request an amendment to that Approval. We recommend that agreements be reached amongst the Army, LRA, and EPA on matters the Army / LRA intend to propose in an amendment request before that request is submitted to EPA for approval. This approach will expedite review of the Army / LRA's future amendment. During the September 13, 2012 call, the Army Corp of Engineers (Mr. James McAlister) and Weston Solutions (Mr. John Woodyard) represented the Army and LRA, respectively.

In connection to the summary presented below, I am making here some general clarifications also communicated during our conference call. The September 4, 2012 Approval is similar to a permit. As such, the conditions in that approval must be implemented as established in the approval unless amended by EPA. The September 4, 2012 Approval is in general for personal property (i.e., building contents that are not at this time part of the real property). However, in relation to cleanup of some of the equipment that is currently part of the real property, some of the Conditions in the September 4, 2012 may also be applicable and as such are likely to be referenced in the future EPA Phase 2 Approval. In addition, under 40 CFR 761.61(c), characterization and cleanup of PCBs must be conducted in accordance with plans approved by EPA and not before receipt of such approval. Certain disposal issues may also be subject to this same requirement.

I am also clarifying that Condition B.9 (Oil-filled equipment) applies to both personal and real property items within the RAAP. This clarification was not addressed during the September 13, 2012 conference call.

Below is a brief summary of the high points of our dialogue. This summary includes preliminary responses provided by me during the September 13, 2012 call based on an extremely limited information exchange during that call. The preliminary responses provided below do not amend the September 4, 2012 Approval and are presented below only for informational purposes and to facilitate a summary of the September 13, 2012 dialogue with the Army and LRA.

Summary of September 13, 2012 Conference Call Amongst Army, LRA, and EPA Region 9

1. Condition A.2 (Equipment, items, and materials not covered by this approval): The Army / LRA propose that instead of testing the equipment, items, and materials addressed in Condition A.2 that they be able to assume for offsite disposal purposes that all the equipment, items, and materials addressed in Condition A.2 contain or it is contaminated with PCBs at levels equal to or above 50 mg/kg (ppm). **EPA's preliminary response:** 40 CFR 761.61(a)(5)(B)(2)(ii) allows the use of such an assumption for disposal in lieu of sampling but only in connection to Bulk PCB Remediation Waste, which does not include porous (e.g., concrete) and non-porous (e.g., uncoated metal) surfaces. EPA will look further into the Army / LRA's request in context to the 761.61(c) regulatory requirements.

2. Deadlines in Conditions A.1 (July 17, 2012 building contents inventory), A.3 (Sampling and analysis plan), and B.8 (Sequence of equipment cleanup): The Army / LRA plan to request extensions to these deadlines which EPA established in response to the urgency expressed by the Army / LRA in moving forward with equipment cleanup. **EPA's preliminary response:** EPA will consider the Army / LRA's request in context to the overall project schedule the Army has offered to provide to EPA.

3. Condition B.1.a (Coating on metal . . .Third paragraph under "*Cleanup verification (testing)*"): The Army / LRA mentioned they have no plans on selling equipment or items to parties outside the RAAP and that requirements in the third paragraph under *Cleanup verification (testing)* may not be necessary. **EPA's preliminary response:** EPA has no assurances from the Army / LRA that personal property (that is the subject of the September 4, 2012 Approval) will not be distributed in commerce to parties outside the RAAP.

4. Conditions B.3.a (Metal surfaces [e.g., equipment, parts] in contact with non-liquid PCBs (e.g., paint containing PCBs): The Army / LRA have asked if they can work directly with the smelter to determine the level of sampling necessary to determine if the waste is amenable to smelting. **EPA's preliminary response:** Sampling methods for disposal of PCB waste must be included in the SAP requested in Condition A.3. The approach to conduct the sampling required in Condition B.3.a must be included in the SAP required in Condition A.3 (not discussed during the September 13, conference call). The September 4, 2012 Approval covers cleanup and disposal of "items" (defined in the Approval to include equipment and materials) at the RAAP. Disposal via a smelter must be supported by proper sampling of items that will be subject to that type of disposal. If the Army / LRA want to consult with the smelter facility of their choosing to inform the SAP required in Condition A.3, EPA supports that approach.

5. Condition A.3 (Sampling and analysis plan), analytical issue: The Army / LRA commented that not many laboratories run the Soxhlet extraction method and would request flexibility to instead use the Sonication extraction method. **EPA's preliminary response:** EPA's preferred extraction method is Soxhlet. In reference to the Army / LRA's comment, selection of the extraction method should be based on the matrix to be extracted. Paints and other non liquid PCBs are more effectively extracted via the Soxhlet method. Our experience indicate successful extraction of PCBs via Sonication is very much laboratory dependent and may not be the most effective extraction method for certain matrices such as paint. Preliminarily, EPA may consider the requested flexibility on the extraction method in context to the different matrices that would be subject to PCB extraction / analysis.

6. Use of abrasives for equipment cleanup. The Army / LRA indicated that certain equipment or items could be damaged if cleaned up via the use of abrasives and would like to propose other cleanup methods such as solvent stripping. **EPA preliminary response:** EPA may consider the Army / LRA's proposal in connection to specific equipment. Waste management, including containment, containerization, sampling for disposal, and disposal of the cleanup waste to be generated must be included as part of such proposals.

7. Disposal of waste containing PCBs at less than 50 ppm. The Army / LRA mentioned the September 4, 2012 Approval is silent on this matter and asked if EPA would approve the disposal site to where less than 50 ppm PCB waste would be taken for disposal. **EPA's preliminary response:** As the generator of the waste, the Army / LRA must meet all applicable TSCA,other federal, state, and local disposal requirements and select the appropriate off-site disposal facility that can accept the waste in compliance with operating permits from EPA or state and local regulatory agencies.

8. Condition B.4.a (Testing and cleanup of tenant equipment): The Army / LRA requested that EPA clarify which tenant equipment is covered under Condition B.4.a. Does the condition include personal or real property or both? **EPA's preliminary response:** EPA will clarify this

condition in response to the Army / LRA's question.

Please review the above summary and let me know if it accurately represents our September 13, 2012 dialogue.

Thank you for your courtesies and for sharing your preliminary comments on the September 4, 2012 Approval with me.

Sincerely,
Carmen

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!"Dr. Seuss

RE: PCBs: Important: EPA's Phase 1 Approval for Riverbank Army Ammunition Plant, Riverbank, CA (UNCLASSIFIED)

Switzer, Warren H CIV USARMY HQDA ACSIM (US) 09/19/2012 12:15 PM

To: Carmen Santos
Cc: "Orloski, Edward F CTR (US)", Debbie Olson , "Woodyard, John (John.Woodyard@WestonSolutions.com)", "McAlister, James P SPK", "Lederle, Thomas E CIV USARMY HQDA ACSIM (US)",
This message is digitally signed.

From:	"Switzer, Warren H CIV USARMY HQDA ACSIM (US)" <warren.h.switzer.civ@mail.mil>
To:	Carmen Santos/R9/USEPA/US@EPA,
Cc:	"Orloski, Edward F CTR (US)" <edward.f.orloski.ctr@mail.mil>, Debbie Olson <DOlson@riverbankira.org>, "Woodyard, John (John.Woodyard@WestonSolutions.com)" <John.Woodyard@WestonSolutions.com>, "McAlister, James P SPK"
History:	This message has been replied to and forwarded.

Classification: UNCLASSIFIED
Caveats: NONE

Ms Santos -

Thank you for taking time to discuss our comments on the September 4 approval for cleaning equipment at Riverbank, and for your prompt e-mail with your informal responses.

We look forward to the meeting on Thursday 20 September, where we hope to clarify and resolve any remaining issues on the Phase 1 approval and receive your initial thoughts on the upcoming Phase 2 proposal.

In advance of the meeting, and in consideration of the limited available time, we are respectfully requesting via e-mail that the following approval conditions be amended or clarified:

Section A.2, Items not covered by the approval: The current language requires that we sample any items being disposed of in a PCB landfill. We propose that A.2 be amended to allow us to assume that any equipment or other items "containing PCBs as the result of a...release" (in this case from exfoliated Galbestos dust) be considered PCB Remediation Waste for purposes of disposal, and can be disposed of in a PCB landfill without sampling. This would include the items listed in A.2, as well as any painted or unpainted equipment for which cleaning for salvage is not feasible or not economically prudent.

Sections A.1, A.3, B.8 and B.9, Setting deliverable schedules: The approval requires that we submit several items to you within 30 days following the date of the approval. Because this requirement is infeasible at this point, we suggest that due dates be proposed for each item as part of the overall schedule, and that commencement of any work impacted by each deliverable begin after you have had sufficient time to review it and comment (typically 30 days). While a more formal project schedule will be sent shortly under separate cover, we propose the following general schedule:

* A.1 Building Inventory: A revised equipment inventory will be submitted within 30 days after our 20 September meeting. This inventory would be accompanied by cleaning method, proposed disposition, and any sampling data, to the extent possible for that equipment.

* A.3 Sampling and Analysis Plan (SAP): A draft SAP will be submitted within 30 days after our 20 September meeting.

* B.8 Sequence of Equipment Cleaning: A draft of our general cleaning plan and sequence will be submitted within 45 days following the 20 September meeting.

* B.9 Oil-filled equipment inventory: An inventory of all oil-filled equipment (including sampling results and lab reports) will be submitted to you at least 30 days before beginning work on any such equipment. (We project this would occur within 60 days following the 20 September meeting.)

Section A.3, Sampling Method: EPA has requested that we use Soxhlet extraction for pre-disposal analysis of paint samples from equipment. In our experience, Soxhlet is intended to extract PCBs from insoluble matrices such as soil, sludge and concrete. In comparison, paint samples need to be completely dissolved (typically in methylene chloride/acetone as required by Method 3550) and exchanged into hexane for analysis.

In the approval, EPA indicated it would consider allowing the use of sonication if we could achieve at least 65% recovery for two surrogates. However, because of the typical size of paint samples (1-2 grams), the concentration of PCB in the paint (up to 500 ppm), and the dilution required, surrogates are not a good measure of data quality because they usually get diluted out. Surrogates are a better QA/QC tool for soil and concrete samples, where the sample is larger and the concentrations are often lower. At high-concentration levels requiring dilutions (even for soil), there is no matrix-related QC; only laboratory QC such as appropriate calibrations, calibration verification checks at required frequency, and laboratory QC samples that meet laboratory criteria for recovery, including surrogate standard associated with these laboratory QC check samples.

We request that the approval be amended to allow the use of either method, subject to EPA's review of the corresponding laboratory SOPs for accuracy and precision, and agreement on acceptable laboratory QC protocols such as those mentioned above. The laboratory we have been using and will continue to use is DOD ELAP accredited and follows the procedures for QC and QA of the DOD Quality Systems Manual for Environmental Laboratories, Version 4.1 (it is the most rigorous protocol). The laboratory is also accredited under the state of California ELAP. We are confident that we can work with EPA and the laboratory to satisfy your need for high quality data.

Section B.1.a, Removal of coating from metal equipment: The approval allows removal of coatings using procedures "such as abrasive blasting/NACE #2". Some equipment items (e.g., presses projected for reuse) may be irrevocably damaged by the blasting grit. We propose using chemical paint stripping followed by confirmation wipe sampling for such equipment in lieu of potentially damaging blasting. The current language of the approval is general and may already allow this process, but we would like either confirmation from EPA that paint stripping is acceptable or clear language in the approval conditions.

Section B.2.a, Preparation of equipment for transportation. EPA approved our proposal to dust off any equipment destined for disposal to avoid cross-contamination, in which we indicated that we planned to solvent wipe the equipment. After further consideration, we propose to expand the list of dusting options to include vacuuming, detergent wiping and possibly pressure washing. If pressure washing is used, we plan to contain the area to avoid overspray, collect all water into tanks, and either:

(a) treat the water to <0.5 ug/L before discharge for irrigation, to

surface waters, or to the sanitary sewer in accordance with 40 CFR 761.79(b)(1)(iii), or
(b) remove the water for off-site treatment at a facility permitted to accept such material.

Section B.1.a, Paint containing <50 ppm PCB from Galbestos dust. The first full paragraph on Page 5 indicates that removed paint and blast media containing <50 ppm PCB can be disposed of as PCB remediation waste consistent with 40 CFR 761.61(a)(5), which includes disposal at a state-approved landfill permitted to accept this material. The approval, however, is silent regarding disposal of equipment coated with the same <50 ppm PCB paint. The current language of the approval is general and may allow this, but we would like either confirmation from EPA that disposal of such equipment in the same manner as removed paint is acceptable, or clear language in the approval conditions so stating.

Section B.4, Tenant Equipment. We understand that any fixed equipment that will remain at the RAAP is not part of this approval, and will be addressed in the (Phase 2) approval for building decontamination and Galbestos panel removal. Most of the non-fixed tenant equipment has been in the buildings for less than five years and is not likely to be contaminated, but we agree to include sampling of selected, non-fixed, tenant equipment as part of our SAP to confirm this. Wipe sampling of selected fixed equipment in the Phase 1 SAP also will be included as a precautionary measure, and paint sampling of fixed tenant equipment will be deferred until Phase 2. Any non-fixed tenant equipment tested and determined to be subject to the approval conditions will be cleaned or disposed of accordingly.

Again, thank you for your prompt response and we look forward to a productive exchange on 20 September.

Sincerely,

Warren Switzer, PhD
Program Manager for RBAAP
OACSIM BRAC-D
703-545-2515

-----Original Message-----
From: Carmen Santos [mailto:Santos.Carmen@epamail.epa.gov]
Sent: Tuesday, September 04, 2012 6:55 PM
To: Switzer, Warren H CIV USARMY HQDA ACSIM (US)
Cc: dolson@riverbanklra.org; Eric Esler; Ivan Lieben; james.p.mcalister@usace.army.mil; John Chesnutt; john.woodyard@westonsolutions.com; Lewis Mitani; Steve Armann
Subject: PCBs: Important: EPA's Phase 1 Approval for Riverbank Army Ammunition Plant, Riverbank, CA

Dear Mr. Warren Switzer:

I am resending the message addressed to you and sent by me on September 4, 2012 (transmitting Phase 1 Approval for RAAP, Riverbank, CA) because I pressed the "send" button too quickly, before I completed the subject line.

Thank you for your courtesies and patience.

Sincerely,

Carmen D. Santos

PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!" Dr. Seuss

****

From: Carmen Santos/R9/USEPA/US
To: warren.h.switzer.civ@mail.mil,
Cc: dolson@riverbanklra.org, john.woodyard@westonsolutions.com, james.p.mcalister@usace.army.mil, John Chesnutt/R9/USEPA/US@EPA, Eric Esler/R9/USEPA/US@EPA, Lewis Mitani/R9/USEPA/US@EPA, Ivan Lieben/R9/USEPA/US@EPA, Steve Armann/R9/USEPA/US@EPA
Date: 09/04/2012 03:36 PM
Subject: PCBs: Important:

Dear Mr. Warren Switzer:

A request was submitted by the LRA in Riverbank, California for a risk-based PCB cleanup at the RAAP buildings. EPA has divided its approval into Phase 1 and Phase 2. The attached letter is the Phase 1 approval and among other things, it involves equipment cleanup and disposal of wastes associated with that cleanup. In the letter we refer to this work as Phase 1 Work to be conducted under the Phase 1 Approval.

Please call me if you have any questions on the Phase 1 approval.

Sincerely,

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the thinks you

can think up if only you try!" Dr. Seuss

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Classification: UNCLASSIFIED
Caveats: NONE

Clean-up particulars at former Riverbank Army Ammunition Plant (RBAAP) (UNCLASSIFIED)

Switzer, Warren H CIV USARMY HQDA ACSIM (US) 09/27/2012 12:48 PM

To: Carmen Santos
"Gibson, Jennifer L CTR USARMY HQDA ACSIM (US)" ,
Cc: "Orloski, Edward F CTR (US)" , "Woodyard, John" , Debbie Olson, "McAlister, James P SPK", "Smith, Robert S CIV (US)",
This message is digitally signed.

From: "Switzer, Warren H CIV USARMY HQDA ACSIM (US)" <warren.h.switzer.civ@mail.mil>
To: Carmen Santos/R9/USEPA/US@EPA,
Cc: "Gibson, Jennifer L CTR USARMY HQDA ACSIM (US)" <jennifer.l.gibson66.ctr@mail.mil>, "Orloski, Edward F CTR (US)" <edward.f.orloski.ctr@mail.mil>, "Woodyard, John" <John.Woodyard@WestonSolutions.com>, Debbie Olson <DOlson@riverbankIra.org>,

Classification: UNCLASSIFIED
Caveats: NONE

Ms Santos -

Thank you for taking time last Thursday to discuss our comments on the September 4 approval for cleaning equipment at Riverbank Thursday. While we seemed to have successfully resolved most of the issues raised in my recent e-mail, you had requested additional detail regarding several points, particularly related to management of wastes generated during the equipment cleaning. The following information will hopefully meet your needs:

Section B.1.a, Removal of coating from metal equipment: EPA has agreed to allow the removal of paint from equipment using either blasting or chemical paint stripping.

Waste generated from blasting will be collected in drums meeting DOT Hazardous Material Regulation requirements and stored as PCB remediation waste in a designated storage area inside the RAAP. Blasting waste will be disposed of as PCB remediation waste at its existing concentration in accordance with 40 CFR 761.79(g).

Waste generated from chemical paint stripping will be collected and stored in the same manner as blasting waste. Chemical paint stripping waste will be incinerated at a facility meeting the requirements of 40 CFR 761.70(a) regardless of PCB concentration.

Section B.2.a, Preparation of equipment for transportation. EPA has agreed to allow us to dust off any equipment destined for disposal to avoid cross-contamination, using any techniques serving this purpose. Techniques we propose for dusting off the equipment include solvent wiping, detergent wiping, vacuuming, and pressure washing.

Solid waste generated from solvent wiping, detergent wiping and vacuuming will be collected and stored in the same manner as blasting waste. No PCB-impacted liquid waste will be generated during the use of these dusting methods. The solid wastes will be disposed of as PCB remediation waste, either based on the existing PCB concentration if sampling is feasible (as will be the case with vacuum dust), or assuming the waste is >50 ppm if sampling is infeasible (as may be the case with rags).

Items being pressure washed will either be placed in a constructed plastic

or metal containment, with solid curbing and sufficient height to avoid escape of overspray. Items that cannot be moved and place in a constructed containment will have a containment assembled around it in-place, meeting the same requirements as the constructed containment. Waste water generated during pressure washing will be collected with wet vacuums and stored in drums or other containers meeting DOT Hazardous Material Regulation requirements. Unless the containers are new, the containers' interior surfaces will first be sampled for PCB to avoid cross contamination of the waste water. We then plan to either: (a) treat the water to <0.5 ug/L before discharge for to the sanitary sewer in accordance with 40 CFR 761.79(b)(1)(iii), or (b) remove the water for off-site treatment at a facility permitted to accept such material. The containments will be disassembled after use, sampled, and disposed of according to their existing concentration.

I hope this fulfills your requirements for completing the approval. Please call either the undersigned or John Woodyard if you need additional information or clarification.

Sincerely,

Warren Switzer, PhD
Program Manager for RBAAP
OACSIM BRAC-D
703-545-2515

Classification: UNCLASSIFIED
Caveats: NONE

TETRA TECH EM INC.
TASK ORDER SUMMARY
Contract No. EP-W-07-019
Reporting Period: 08/27/2012 - 09/30/2012

Task Order No.	054	**Related Invoice No:**	TO 054-20
Title:	Pollution Prevention and Resource Conservation Technical Assistance	**Date of Report:**	10/09/12
		Project Manager:	Patrick Woollever
TO Type:	Fixed Rate Ceiling	**Phone No:**	510-302-6240
% of Work Completed:	90.00%	**TO COR:**	Kevin Castro
$ of Work Completed:	$ 85,072.13	**POP:**	10/01/2010 - 12/31/2012
Region:	EPA Region 09		
		Approved Budget:	102,090.00
		Current Funded Amount:	102,090.00
		Cumulative Paid:	83,504.71

	Current Hours	Current Amount	Cumulative Hours	Cumulative Amount
Labor Cost				
Sr Engineer	13.5	1,776.22	464.0	61,048.87
Sr Environmental Scientist	0.0	0.00	0.5	55.54
Staff Environmental Scientist	0.0	0.00	213.5	18,548.88
Jr Environmental Scientist	0.0	0.00	0.0	0.00
Clerical / Admin	0.0	0.00	2.0	116.00
Total Labor Hours and Costs	13.5	1,776.22	680.0	79,769.29
Other Direct Costs				
Photocopies		(11.30)		77.27
Mail/Delivery		0.00		57.08
Telecommunications		0.00		32.12
Computer		(177.82)		1,628.64
Supplies		0.00		0.00
Equipment Rental		0.00		0.00
All Others		0.00		0.00
Total Other Direct Costs		(189.12)		1,795.11
Travel		0.00		3,008.29
Subcontractors Costs		0.00		0.00
G&A on Non-Labor		(19.68)		499.44
TOTAL COSTS		1,567.42		85,072.13
Suspended/Reinstated		0.00		0.00
TOTAL BILLED		1,567.42		85,072.13

TETRA TECH EM INC.
TASK ORDER SUMMARY BY TASK
Contract No. EP-W-07-019
Reporting Period: 08/27/2012 - 09/30/2012

Task Order No.	054	**Related Invoice No:**	TO 054-20
Title:	Pollution Prevention and Resource Conservation Technical Assistance	**Date of Report:**	10/09/12
		Project Manager:	Patrick Woollever
TO Type:	Fixed Rate Ceiling	**Phone No:**	510-302-6240
% of Work Completed:	90.00%	**TO COR:**	Kevin Castro
$ of Work Completed:	$ 85,072.13	**POP:**	10/01/2010 - 12/31/2012
Region:	EPA Region 09		
		Estimate at Completion:	102,090.00
		Cumulative Paid:	83,504.71

Task No.	Task Name	Current Hours	Current Amount	Cumulative Hours	Cumulative Amount	Current Funding	% Funding Expended	Approved Hours	Approved Amount
01	Waste Characterization Audits and Trainings	6.0	736.41	330.0	47,637.19	47,351.00	100.60%	390.0	47,351.00
02	Green Lodging Programs	7.5	831.01	350.0	37,434.94	54,739.00	68.39%	546.0	54,739.00
Total for Task Order 054		13.5	1,567.42	680.0	85,072.13	102,090.00	83.33%	936.0	102,090.00
Suspended			0.00		0.00				
Total Billed			1,567.42		85,072.13				

TETRA TECH EM INC.
CURRENT LABOR REPORT
Contract No. EP-W-07-019
Reporting Period: 08/27/2012 - 09/30/2012

Task Order No. 054
Title: Pollution Prevention and Resource Conservation Technical Assistance
TO Type: Fixed Rate Ceiling
% of Work Completed: 90.00%
$ of Work Completed: $ 85,072.13
Region: EPA Region 09

Related Invoice No: TO 054-20
Date of Report: 10/09/12
Project Manager: Patrick Woollever
Phone No: 510-302-6240
TO COR: Kevin Castro
POP: 10/01/2010 - 12/31/2012

Company/Labor Category	Employee Name	Rate	Current Hours	Current Amount	Cumulative Hours	Cumulative Amount
Task Number: 01	**Task Name: Waste Characterization Audits and Trainings**					
Tetra Tech						
Clerical / Admin	Winkler, Chauna D	57.99			1.0	58.00
Sr Engineer	Michaels, Jean M	131.57			1.0	131.57
	Woollever, Patrick F	131.57	6.0	789.43	327.5	43,089.39
Sr Environmental Scientist	Brown, David L	111.07			0.5	55.54
Total for Tetra Tech			6.0	789.43	330.0	43,334.50
Total for Task 01			6.0	789.43	330.0	43,334.50
Task Number: 02	**Task Name: Green Lodging Programs**					
Tetra Tech						
Clerical / Admin	Dancy, Mattie R	57.99			0.5	29.00
	Winkler, Chauna D	57.99			0.5	29.00
Sr Engineer	Woollever, Patrick F	131.57	7.5	986.79	135.5	17,827.91
Staff Environmental Scientist	Henderson, Christine L	86.88			8.0	695.04
	Johnson, Rebecca L	86.88			205.5	17,853.64
Total for Tetra Tech			7.5	986.79	350.0	36,434.79
Total for Task 02			7.5	986.79	350.0	36,434.79
Total for Task Order 054			13.5	1,776.22	680.0	79,769.29

TETRA TECH EM INC.
CURRENT OTHER DIRECT COST REPORT
Contract No. EP-W-07-019
Reporting Period: 08/27/2012 - 09/30/2012

Task Order No. 054
Title: Pollution Prevention and Resource Conservation Technical Assistance
TO Type: Fixed Rate Ceiling
% of Work Completed: 90.00%
$ of Work Completed: $ 85,072.13
Region: EPA Region 09

Related Invoice No: TO 054-20
Date of Report: 10/09/12
Project Manager: Patrick Woollever
Phone No: 510-302-6240
TO COR: Kevin Castro
POP: 10/01/2010 - 12/31/2012

Vendor Name	Account Name	Office	Amount	Invoice #	Transaction Description
Task Number: 01	**Task Name: Waste Characterization Audits and Trainings**				
Other Direct Costs	Other Direct Costs - Computer	103 Oakland	(48.01)		Computer Usage Time
Total for Task 01			(48.01)		
Task Number: 02	**Task Name: Green Lodging Programs**				
Other Direct Costs	Other Direct Costs - Computer	103 Oakland	(129.81)		Computer Usage Time
Materials/Equipment	Other Direct Costs - Reproduction	103 Oakland	(11.30)		Reproduction (each)
Total for Task 02			(141.11)		
Total for Task Order 054			(189.12)		

TETRA TECH EM INC.
TASK ORDER DISBURSEMENT HISTORY
Contract No. EP-W-07-019
Reporting Period: 8/27/2012 - 9/30/2012

Task Order No:	054	Related Invoice No.	TO 054-20
Title:	Pollution Prevention, Resource Conservation Assistance	Date of Report:	10/9/2012
TO Type:	Fixed Rate Ceiling	Project Manager:	Patrick Woollever
% of Work Compl:	90.00%	Phone No:	510-302-6240
$ of Work Compl:	$85,072.13	TOCOR:	Michelle Baker
Region:	EPA Region 9	POP:	10/01/2010-12/31/2012

Invoice Date	For Period Ending	Invoice Number	Invoice Amount	Amount Paid	Amount Not Paid
03/08/11	02/27/11	TO 054-01	$2,766.92	$2,766.92	$0.00
04/12/11	04/03/11	TO 054-02	$2,631.92	$2,631.92	$0.00
05/10/11	05/01/11	TO 054-03	$2,030.31	$2,030.31	$0.00
06/07/11	05/29/11	TO 054-04	$5,653.15	$5,653.15	$0.00
07/12/11	07/03/11	TO 054-05	$3,137.72	$3,137.72	$0.00
08/09/11	07/31/11	TO 054-06	$5,006.63	$5,006.63	$0.00
09/06/11	08/28/11	TO 054-07	$4,362.76	$4,362.76	$0.00
10/11/11	10/02/11	TO 054-08	$787.98	$787.98	$0.00
11/08/11	10/30/11	TO 054-09	$1,817.03	$1,817.03	$0.00
12/06/11	11/27/11	TO 054-10	$4,172.45	$4,172.45	$0.00
01/10/12	01/01/12	TO 054-11	$9,419.65	$9,419.65	$0.00
02/07/12	01/29/12	TO 054-12	$9,339.88	$9,339.88	$0.00
03/06/12	02/26/12	TO 054-13	$5,674.82	$5,674.82	$0.00
04/10/12	04/01/12	TO 054-14	$11,089.54	$11,089.54	$0.00
05/08/12	04/29/12	TO 054-15	$2,281.85	$2,281.85	$0.00
06/05/12	05/27/12	TO 054-16	$7,297.66	$7,297.66	$0.00
07/10/12	06/30/12	TO 054-17	$3,207.90	$3,207.90	$0.00
08/07/12	07/29/12	TO 054-18	$1,749.77	$1,749.77	$0.00
09/04/12	08/26/12	TO 054-19	$1,076.77	$1,076.77	$0.00
10/09/12	09/30/12	TO 054-20	$1,567.42		
TOTALS			$85,072.13	$83,504.71	$0.00

TETRA TECH EM INC.
TASK ORDER MODIFICATION HISTORY
Contract No. EP-W-07-019
Reporting Period: 8/27/2012 - 9/30/2012

Task Order No: 054

Modification Number	Modification Date	Funding	Description
Award	09/29/10	$37,449.00	Award and partially fund the project
01	03/25/11	$9,641.00	Approve TOP dated 3/8/11; add funding
02	04/03/11	$0.00	Clarify TO Ceiling Amount as $48,205
03	12/08/11	$40,000.00	Approve TOP dtd 11/23/11; add funding; extend POP
04	12/23/11	$0.00	Administrative correction to Mod 3; extend POP
05	04/05/12	$15,000.00	Approve TOP dtd 4/2/12; add funding
06	06/22/12	$0.00	Approve TOP dtd 6/19/12; extend POP
TOTALS		$102,090.00	

TETRA TECH EM INC.
TASK ORDER COST PERFORMANCE SELF-REPORTING
Contract No. EP-W-07-019
Reporting Period: 3/31/2012 - 9/30/2012

Task Order No:	054	Related Invoice No.	TO 054-20
Title:	Pollution Prevention, Resource Conservation Assistance	Date of Report:	10/9/2012
TO Type:	Fixed Rate Ceiling	Project Manager:	Patrick Woollever
% of Work Compl:	90.00%	Phone No:	510-302-6240
$ of Work Compl:	$85,072.13	TOCOR:	Michelle Baker
Region:	EPA Region 9	POP:	10/01/2010-12/31/201

Task	Task Name	Negotiated Costs	Percent Complete	Value Completed	Actual Costs	% Variance (Over)/Under	Performance Score
01	Waste Characterization Training	$47,351.00	100%	$47,351.00	$47,637.19		
02	Green Lodging Programs	$54,739.00	82%	$44,885.98	$37,434.94		
TOTALS		$102,090.00	90%	$92,236.98	$85,072.13	8%	3.0

TETRA TECH EM INC.
TASK ORDER ON-TIME PERFORMANCE SELF-REPORTING
Contract No. EP-W-07-019
Reporting Period: 3/31/2012 - 9/28/2012

Task Order No: 054

Task	Deliverable Name	Scheduled Due Date	Submittal Date	On Time	Performance Score
Quarter 1 - 2011				100%	4.3
Quarter 2 - 2011				90%	4.2
Quarter 3 - 2011				88%	4.2
Quarter 4 - 2011				90%	4.3
Quarter 1 - 2012				90%	4.3
	March MPR	04/20/12	04/16/12	Yes	5.0
02	Draft Final Public Green Lodging Program Matrix	04/18/12	04/18/12	Yes	4.0
01	Picayune Workshop H&S Plan	05/07/12	05/07/12	Yes	4.0
02	Detailed Description: Standard Development and Conformity Assessment	05/07/12	05/07/12	Yes	4.0
01	Picayune Workshop	05/10/12	05/10/12	Yes	4.0
	April MPR	05/18/12	05/10/12	Yes	5.0
02	Final Public Green Lodging Program Matrix	06/04/12	06/01/12	Yes	5.0
	May MPR	06/15/12	06/11/12	Yes	5.0
	June MPR	07/20/12	07/20/12	Yes	4.0
02	Revised Final Public Green Lodging Program Matrix	07/23/12	07/23/12	Yes	4.0
01	Draft Picayune Waste Characterization Follow-Up Report	08/10/12	08/10/12	Yes	4.0
	July MPR	08/17/12	08/13/12	Yes	5.0
	August MPR	09/14/12	09/11/12	Yes	5.0
01	Final Picayune Waste Characterization Follow-Up Report	09/25/12	09/25/12	Yes	5.0
TOTAL	Cumulative On-Time Percent			93%	4.4

From: "Santos.Carmen@epamail.epa.gov" <Santos.Carmen@epamail.epa.gov>
Date: December 13, 2012, 7:07:33 PM CST
To: "warren.h.switzer.civ@mail.mil" <warren.h.switzer.civ@mail.mil>
Cc: "DOlson@riverbanklra.org" <DOlson@riverbanklra.org>, "Edward.Orloski@calibresys.com" <Edward.Orloski@calibresys.com>, "Esler.Eric@epamail.epa.gov" <Esler.Eric@epamail.epa.gov>, "Lieben.Ivan@epamail.epa.gov" <Lieben.Ivan@epamail.epa.gov>, "Armann.Steve@epamail.epa.gov" <Armann.Steve@epamail.epa.gov>, "james.m.stuhltrager.civ@mail.mil" <james.m.stuhltrager.civ@mail.mil>, "James.P.McAlister@usace.army.mil" <James.P.McAlister@usace.army.mil>, "jennifer.l.gibson66.ctr@mail.mil" <jennifer.l.gibson66.ctr@mail.mil>, "Chesnutt.John@epamail.epa.gov" <Chesnutt.John@epamail.epa.gov>, "Mitani.Lewis@epamail.epa.gov" <Mitani.Lewis@epamail.epa.gov>, "thomas.e.lederle.civ@mail.mil" <thomas.e.lederle.civ@mail.mil>, "william.j.odonnell50.civ@mail.mil" <william.j.odonnell50.civ@mail.mil>, "Woodyard, John" <John.Woodyard@WestonSolutions.com>

Subject: PCBs: Riverbank Army Ammunition Plant: September 4, 2012 Phase 1 Approval - Amendment 2

Dear Mr. Switzer:

We appreciate the attached December 10, 2012 electronic mail (e-mail) message that John Woodyard (Weston Solutions) sent on behalf of the U.S. Army (Army) and the LRA to USEPA Region 9 (USEPA). Below, I am replying to certain items in that message. Therefore, this message serves as Amendment 2 to the Phase 1 Approval dated September 4, 2012. Amendment 2 also modifies Conditions 1 and 2 in Amendment 1 to the Phase 1 Approval.

In the attached e-mail message, Weston Solutions proposes that USEPA review and approve deliverables required in Conditions A.1, A.3, B.8, and B.9 in the Phase 1 Approval within 30 days after receipt of the deliverables. Please refer to Item 2 below concerning this matter.

USEPA December 13, 2012 Amendment 2 to Phase 1 Approval

1. Request to extend the Army / LRA deadlines to submit deliverables required in several conditions of approval. USEPA is granting a time extension for the Army / LRA to submit the deliverables in Conditions A.1, A.3, B.8, and B.9 in the September 4, 2012 Phase 1 Conditional Approval to **not later than 120 days after October 29, 2012.** The October 29, 2012 date is the date of Amendment 1 to the Phase 1 Approval.

Please note that via its September 19, 2012 e-mail message the Army proposed revised deadlines to the schedule in the Phase 1 Approval to submit the deliverables required in the conditions referenced above. Based on that proposal, the Army would submit the deliverables within 30 days after the date of the September 20, 2012 meeting. And the Army indicated that it would submit a formal proposed revised schedule shortly after the September 19, 2012 message. On September 20, 2012 we agreed to the revised schedule proposed in the Army's September 19, 2012 message. USEPA did not receive a formal revised schedule from the Army as indicated in the message.

Amendment 1 (dated October 29, 2012) to the Phase 1 Approval modified the schedule to submit the deliverables required in Conditions A.1, A.3, B.8, and B.9 that was agreed to by the Army and USEPA on

September 20, 2012. Based on the revised deliverable schedule established in Amendment 1 the deliverables required in Conditions A.1, A.3, and B.8 were due by November 20, 2012 and B.9 by December 20, 2012. However, that schedule was not met by the Army / LRA.

This message (Amendment 2) is amending for the third time the schedule for the Army / LRA to submit the deliverables required in Conditions A.1, A.3, B.8, and B.9. We have been under the understanding that both the Army and LRA want to move fast with cleanup of the personal property so that cleanup of the building structures, including Galbestos removal and disposal, can begin sooner than later.

2. Request for a 30-day USEPA review after receipt of deliverables. Under 40 CFR 761.61(c) USEPA does not have a regulatory requirement to review and approve deliverables within a certain specific time frame. Therefore, USEPA is not agreeing to a 30-day review time for deliverables it has required be submitted for approval. However, USEPA will make its best effort to review and approve deliverables within a reasonable time frame.

3. Assumption of PCB concentration for disposal of PCB remediation waste in landfill. Modification to Condition A.2 in Phase 1 Approval and Condition 1 in Amendment 1 to Phase 1 Approval. The Army / LRA requested that it be allowed to assume that ". . . any material removed from the RAAP facility for landfill disposal contains PCB concentrations above 50 mg/kg including porous surfaces (such as painted metal), without sampling the material . . ." This request was made in the Army's November 26, 2012 electronic mail message.

Amendment 1 to the Phase 1 Approval allowed application of the PCB concentration assumption (applicable to bulk PCB remediation waste) in lieu of sampling for disposal established in 40 CFR 761.61(a)(5)(B)(2)(i). This was allowed in Amendment 1 for disposal of PCB remediation waste porous surfaces (e.g., wood or concrete) and PCB cleanup wastes at a TSCA approved or RCRA permitted landfill. The assumption established in 761.61(a)(5)(B)(2)(i) refers to a total PCB concentration for disposal equal to or greater than 50 ppm (mg/kg) and not just to concentrations above 50 ppm.

In this Amendment 2 consistent with 40 CFR 761.61(c), USEPA is extending the use of that assumption to PCB remediation waste non-porous surfaces (e.g., metal) that are coated **and will not be disposed via a smelter or scrap metal recovery oven.** Coated PCB remediation waste non-porous surfaces are considered porous surfaces if the coating is not removed prior to disposal.

The above assumptions for disposal **do not apply to any electrical equipment** including transformers which must be disposed of consistent with the disposal requirements in 40 CFR 761.60.

The above assumptions for disposal do not apply to PCB Items that may be present at the RAAP (e.g., compressors, hydraulic presses). Such Items must be disposed of in accordance with the applicable regulatory requirements in 40 CFR 761.60. Some of the PCB Items (e.g., PCB Articles) present at the RAAP may be specifically listed in 40 CFR 761.60. PCB Items must be disposed of consistent with the most stringent requirements among 761.60 and 761.61(a) if the Items are also contaminated with Galbestos dust.

If not sampled for disposal, uncoated non-porous surfaces must be disposed of in accordance with the disposal requirements for bulk PCB remediation waste containing PCB concentrations equal to or above 50 mg/kg.

Amendment 2 does not modify the sampling requirements for PCB remediation waste non-porous (coated and not coated) surfaces that will be disposed of at a smelter or scrap metal recovery oven facility.

The generator of the PCB waste at the RAAP is responsible for making accurate waste disposal determinations and selecting the appropriate disposal site. The generator must comply with all applicable requirements in 40 CFR 761, Subpart J (General Records and Reports) and K (PCB Waste Disposal

Records and Reports). The generator of the PCB waste must comply with all applicable state and local regulations in addition to other applicable federal regulations.

End of Amendment 2 to September 4, 2012 Phase 1 Approval

Please call me at 415.972.3360 if you have any questions concerning this message and Amendment 2 to the Phase 1 Approval.

Thank you for your courtesies and patience.

Sincerely,

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
santos.carmen@epa.gov

***"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!"* Dr. Seuss**

****

APPENDIX B
EQUIPMENT AND MISCELLANEOUS WASTE INVENTORIES

APPENDIX B-1
FIXED HYDRAULIC AND MECHANICAL PRESSES

Table B-1 Painted Hydraulic and Mechanical Presses
Disposal: Landfill Disposal or Paint Removal/Scrap [1]

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
1,000,000	8	22W	1	Press, 3500 ton Hydraulic	14803
1,000,000	8	27-28E	1	Press, 3500 ton Hydraulic	4086
750,000	8	7E	1	Press, 2500 ton Hydraulic	1082
750,000	8	12E	1	Press, 2500 ton Hydraulic	1084
500,000	8	7W	1	Press, 1500 ton Hydraulic	1083
500,000	8	12W	1	Press, 1500 ton Hydraulic	1085
500,000	8	17E	1	Press, 2500 ton Hydraulic	4776
500,000	8	17W	1	Press, 1500 ton Hydraulic	4702
400,000	8	1	1	Press, 2000 ton Mechanical	13982
400,000	8	1	1	Press, 2000 ton Mechanical	14010
400,000	8	1	1	Press, 2000 ton Mechanical	14252
350,000	1		1	Press, 800 ton Mechanical	14009
350,000	8	1	1	Press, 1600 ton Mechanical	14011
300,000	1		1	Press, 800 ton Mechanical	13983
300,000	48	1-2	1	Press, 800 ton Hydraulic	21780
120,000	13	11A-12A	1	Danly 400 Ton Press	USA# 17688/Tag #133
120,000	13	12C-13C	1	Danly 400 Ton Press	USA 17687
100,000	8	1	1	Press, 300 ton Mechanical	18976
100,000	8	1	1	Press, 300 ton Mechanical	18977
100,000	8	1	1	Press, 300 ton Mechanical	18979
75,000	8	5	1	Press, 250 ton Hydraulic	14103
75,000	8	5	1	Press, 250 ton Hydraulic	1050
75,000	8	5	1	Press, 250 ton Hydraulic	1051
75,000	8	5	1	Press, 250 ton Hydraulic	14101
75,000	8	6	1	Press, 250 ton Hydraulic	13981
75,000	8	6	1	Press, 250 ton Hydraulic	14016
75,000	8	6	1	Press, 250 ton Hydraulic	14021
75,000	8	6	1	Press, 250 ton Hydraulic	14102
75,000	8	10CE	1	Press, 250 ton Hydraulic	1061
75,000	8	10E	1	Press, 250 ton Hydraulic	1059
75,000	8	15E	1	Press, 250 ton Hydraulic	1063
75,000	8	20E	1	Press, 250 ton Hydraulic	1070
75,000	8	21E	1	Press, 250 ton Hydraulic	1071
60,000	8	25C	1	Press, 200 ton Hydraulic	116
50,000	8	10CW	1	Press, 150 ton Hydraulic	1053
50,000	8	15CE	1	Press, 150 ton Hydraulic	1060
50,000	8	20C	1	Press, 150 ton Hydraulic	1062
50,000	8	25C	1	Press, 150 ton Hydraulic	536
40,000	8	10W	1	Press, 125 ton Hydraulic	1055
40,000	8	15CW	1	Press, 125 ton Hydraulic	1057
40,000	8	20C	1	Press, 125 ton Hydraulic	1058
35,000	8	1	1	Press, 100 ton Hydraulic	121
35,000	8	25W	1	Press, 100 ton Hydraulic	117
30,000	8	7C	1	Press, Hydraulic,80 Ton	1073
30,000	8	12C	1	Press, Hydraulic,80 Ton	1069
30,000	8	17C	1	Press, Hydraulic,80 Ton	4070
25,000	8	11E	1	Press, Hydraulic,75 Ton	1064
25,000	8	15W	1	Press, Hydraulic,75 Ton	1065
25,000	8	20W	1	Press, Hydraulic,75 Ton	1078
12,500	13	18C-19C	1	Press 45 Ton Press w/ control stand	USA 18443
12,500	13	18C-19C	1	Press 45 Ton	USA 18444

Table B-1 Painted Hydraulic and Mechanical Presses
Disposal: Landfill Disposal or Paint Removal/Scrap [1]

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
10,000	8	10E	1	Press 45 Ton Mechanical	20505
10,165,000			**52**	**Total Hydraulic and Mechanical Presses (tons): 5,082.5**	

5082.5 tons

Equipment that may contain oils

Note 1: A limited number of presses in Building 8 may remain at RAAP in a continued commercial/industrial setting.

APPENDIX B-2
NON-FIXED PROCESS EQUIPMENT AND OTHER MISCELLANEOUS PERSONAL PROPERTY

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
150,000	1	3A-8A	1	Furnace/spray booth lines	
150,000	1	9A-15A	10	Lathes, Detroit 424-21	
150,000	1	18A-25A	1	Large processing equipment, overhead conveyors	
150,000	1/2	West Courtyard	300	Bins, contents	
150,000	6	10B-16B	1	Machine, processing, heavy industrial	20186
150,000	45	2-5	1	Furnace/spray booth lines	
125,000	4/5	West Courtyard	250	Baskets, contents	
120,000	6	13A-15A	3	Lathes, heavy industrial equipment	
100,000	1	31A-37A	1	Processing equipment	
100,000	13	6A-9A	1	Furnance/Oven, Fan, Misc Equipment	
100,000	50	3A-11A	1	Furnance, Lathes, Misc Process Equipment	
80,000	6	3-10N	1	FURNACE ANNEALING GAS FIRED	5801
80,000	6	3-10S	1	FURNACE ANNEALING GAS FIRED	5802
80,000	171		2	Industrial Furnaces	USA16716
50,000	8	14-15	5	Lathes	
40,000	5	1A-4A	1	Misc processing equipment	
40,000	6	20A-23A	1	Processing equipment	4055
40,000	45	9A-14A	1	Lathe, Acme Gridley	11154
40,000	45	9A-14A	1	Lathe, Acme Gridley	10972
40,000	45	9A-14A	1	Lathe, Acme Gridley	10909
40,000	45	9A-14A	1	Lathe, Acme Gridley	10964
40,000	45	9A-14A	1	Lathe, Acme Gridley	11086
40,000	45	9A-14A	1	Lathe, Acme Gridley	10969
40,000	45	9A-14A	1	Lathe, Acme Gridley	10986
40,000	45	9A-14A	1	Lathe, Acme Gridley	10963
40,000	171		1	Triple Hopper w/ up/down conveyors	
39,500	4/5	West Courtyard	158	Metal pallet, heavy industrial	
35,500	7/1	West Courtyard	71	Steel framing sections	
30,000	6	32A-34A	1	Processing equipment	USA 14559
28,000	1	18A-19A	14	Heavy industrial machinery, tarped	
28,000	13/171		112	Various Items	
27,000	13/171		27	Various Items	
25,000	1	25A-28A	1	Trench Diamond Plating (~2,500 Ft^2)	
25,000	6	15A-16A	3	Machine components, heavy	
25,000	6	23A-31A	1	Conveyor system	USA 2017
25,000	13/171		50	Various Items	
24,500	3/4	West Courtyard	7	Machine components, 2.5'L x 6'H x 2.5'W	
20,000	1	13B-15B	1	Conveyor, Monorail, 1-5, 600'	15596
20,000	1	32A-34A	1	Process equipment	14247
20,000	1	32A-34A	1	Process equipment	14248
20,000	4	31A-32A	1	Processing equipment, 20'L x 5'H x 3'W	
20,000	8	21-22	1	Misc tooling/dyes	
20,000	9	4A-5A	2	Lathe	USA 17043/Tag 197
20,000	9	9A-10A	2	Mill	
20,000	48	10A-11A N	4	Process equipment	
18,000	1	4A-6A	12	Steel beam, 25'L	
15,000	4	2A-4A N	2	Lathe threading machine components	21740, 21741
15,000	4	4A-7A N	1	Mechanical Press component - skid w/ motor	
15,000	4	9A-10A N	4	Hopper, misc equipment	
15,000	5	21A-23A	30	Pallet, assorted machine components, heavy	
15,000	5	27A-28A	3	Machine, processing, heavy industrial	
15,000	6	13A-15A	3	Trimming machine	
15,000	6	14B	3	Machine, Trimming,V & O, Trims	1993
15,000	6	15A-16A	3	Conveyor section, rollers, 12'L x 6'H x 2.5'W	
15,000	8	2-3	1	Lathe, Engine, Manual, 11- Swing	16902
15,000	8	15-16	1	Lathe, Engine, Manual, 10- Swing	
15,000	13	4C-5C	1	Parts Wash Cleaning Machine	Tag#130/SN#3E-1278/Model # RD-118
15,000	13	13A-14A	1	Parts Wash Cleaning Machine	Tag#130/SN#3E-1278/Model # RD-118
12,500	160	A	25	Shelving unit, steel, 10'L x 12'H x 3.5'W	

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
12,000	8	8-9	6	Process equipment	
12,000	13	Upper 10C-11C	2	Hoppers with scaffold	
11,000	4/5	West Courtyard	22	Bin, rolling	
10,000	1	1A-4A	1	Storage tank / hopper, 15'H x 8'D	
10,000	1	6A-8A	1	Machine, heavy industrial	
10,000	1	8A-9A	2	Pallet, heavy machine components	
10,000	1	18A-19A	2	Wood bin, heavy machine components	
10,000	4	23A-26A	2	Lift machines	
10,000	4	26A-28A	1	Lift	
10,000	4	31B-32B S	2	Process equipment components	
10,000	4	34S-35B S	2	Process equipment components	
10,000	4	36B-37B S	6	Process equipment components (on pallets)	
10,000	4	38B-39B S	2	Process equipment	
10,000	5	6A-10A	4	Control box, 10'L x 4'H x 5'W	
10,000	6	2-3A	1	Washer,Industrial,Soap Removal	5794
10,000	6	2-3B	1	Washer,Industrial,Soap Removal	5795
10,000	6	3-10N	1	Conveyors, overhead	
10,000	6	19A-20A	1	Lathe, Cartridge Case 5- O.D.	13296
10,000	6	19N	1	Trimming Machine, C.C.	19771
10,000	6	19S	1	Trimming Machine, C.C.	19770
10,000	7/1	West Courtyard	20	Steel shelving units / cabinets	
10,000	8	10	1	Conveyor,Monorail, 6A,585'Long	5594
10,000	8	28-29	1	Forklift	
10,000	9	3A-4A	1	Lathe	USA 13020/Tag 116
10,000	9	4A-5A	1	Mill	
10,000	9	5A-6A	1	Lathe	USA 19978/Tag 201/NI-0261
10,000	9	5A-6A	1	Mill	
10,000	9	6A-7A	1	Lathe	
10,000	9	13A-14A	1	Grinder	
10,000	9	15C-16C	1	Lathe	
10,000	9	20B-21B	1	Lathe	USA 2917/Tag 231
10,000	9	21B-22B	1	Lathe	
10,000	9	21B-22B	1	Grinding machine	
10,000	13	Upper 22C-23C	2	Assembly Machine Horizon - M46 Grenade	USA 17422
10,000	50	9	1	Acid Recrys Unit	21797
10,000	171		1	Hopper/Conveyor w/ 4'h railing	USA17704
10,000	171		1	Large Beige Equipment	USA 17776/Tag # 156
9,000	13	Upper 11C-13C	3	Debur machine	
8,800	6	36A-39A	11	Bin, 3'L x 4'H x 3'W	
8,500	4/5	West Courtyard	17	Bin, rolling	
8,000	1	1A-4A	2	Conveyor, rollers, 8 - 15'L x 3'H x 4'W	
8,000	1	27A-28A	4	Thread rolling machines	
8,000	4	9A-10A N	1	Misc parts	
8,000	5	28A-30A	1	Large motor, air compressor, misc	
8,000	6	19A-23A	1	Conveyor, rollers, 80'L x 12'H x 15'W	
7,500	1	9A-13A	3	Pallet, heavy machine components	
7,500	1	13B-15B	3	Pallet, heavy machine components	
7,500	1	18A-19A	3	Wood bin, heavy machine components	
7,500	1	25A-28A	1	Lathe, LR-250 #1	11154
7,500	1	25A-28A	1	Lathe, LR-250 #10	10972
7,500	1	25A-28A	1	Lathe, LR-250 #2	10909
7,500	1	25A-28A	1	Lathe, LR-250 #3	10964
7,500	1	25A-28A	1	Lathe, LR-250 #4	11086
7,500	1	25A-28A	1	Lathe, LR-250 #5	10969
7,500	1	25A-28A	1	Lathe, LR-250 #6	10986
7,500	1	25A-28A	1	Lathe, LR-250 #7	10963
7,500	1	25A-28A	1	Lathe, LR-250 #8	10988
7,500	1	25A-28A	1	Lathe, LR-250 #9	10997
7,500	3/4	East Courtyard	5	Steel platforms	
7,500	4	20A-22A	5	Storage tank / hopper, 4'L x 8'H x 4'W	
7,500	5	8A	1	Lathe	19778

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
7,500	5	9A	1	Lathe	278
7,500	5	9A	1	Lathe	10906
7,500	5	9A	1	Lathe	12098
7,500	5	21A-23A	15	Wood bin, assorted machine components	
7,500	6	18A	1	Lathe, Chucking, 6-Spindle	19764
7,500	13	20C-21C	1	Industrial Machine - Acme-Gridley	LI144/LAV16639
7,500	13	21C-24C	1	Industrial Machine - Acme-Gridley	LI145/LAV16603
7,500	13	21C-24C	1	Industrial Machine - Acme-Gridley	LI146/LAV18586
7,500	13	21C-24C	1	Industrial Machine - Acme-Gridley	LI147/LAV18032
7,500	13	21C-24C	1	Industrial Machine - Acme-Gridley	LI148/LAV16641
7,500	13	21C-24C	1	Industrial Machine - Acme-Gridley	LI149/LAV16643
7,500	13	21C-24C	1	Industrial Machine - Acme-Gridley	LI150/LAV16642
7,500	13	21C-24C	1	Industrial Machine - Acme-Gridley	L151/LAV16578
7,500	13	21C-24C	1	Industrial Machine - Acme-Gridley	L152/LAV18587
7,500	13	21C-24C	1	Industrial Machine - Acme-Gridley	L153/LAV18505
7,500	13	Upper 11C-13C	1	Lathe	USA 18568/Tag 164
7,500	13	Upper 11C-13C	1	Lathe	Tag 153
7,500	13	Upper 11C-13C	1	Lathe	USA 16759/ Tag 162
7,500	13	Upper 11C-13C	1	Lathe	Tag 161
7,500	13	Upper 11C-13C	1	Lathe	USA 16580 / Tag 160
7,500	13	Upper 11C-13C	1	Lathe	
7,500	51	Lab	1	Lathe, Engine, Manual, 12- Swing	17938
7,500	160	A	30	Shelving unit, 8'L x 10'H x 3'W	
7,000	4	32B-34 S	14	Control boxes	
7,000	8	24-25	1	Hydroblaster	
7,000	8	24-25	1	Sandblaster	
6,250	4	4A-7A N	5	Mechanical Press component - misc	
6,250	5	23A-24A	25	Crate, assorted machine components, small	
6,000	1	19A-22A	4	Pallet, hanging rack components	
6,000	4	2A-4A N	4	Lathe threading machine component - beams	
6,000	5	19A-21A	4	Pallet, assorted machine components	
6,000	13	13A-14A	3	Threading machines	
5,500	5	1A-4A	11	Generator	
5,000	1	4A-6A	1	Machine, heavy industrial	19856
5,000	1	4A-6A	1	Machine component, heavy	
5,000	1	8A-9A	2	Conveyor, rollers, 6'L x 3'H x 4'W	
5,000	1	8A-9A	1	Storage unit, 20'L x 5'H x 3'W	
5,000	1	28A-30A	1	Conveyors, roller	
5,000	1	37A-39A	1	Sealing Machine Case (Box) Tap	16302
5,000	4	2A-4A N	2	Lathe threading machine component - conveyors	
5,000	4	11A-12A N	1	Sand-blast booth	
5,000	4	17A-18A N	1	Diamond plate catwalk / stairs	
5,000	4	20A-22A	1	Storage tank / hopper, 4'L x 10'H x 4'W	
5,000	4	22A-23A	1	Storage tank / hopper, 4'L x 10'H x 4'W	
5,000	4	30B-31B S	1	Forklift	
5,000	5	27A-28A	7	Pallet, assorted machine components	
5,000	5	38A-39A	1	Lathe, rollers	
5,000	6	11-23S	1	Conveyor, Monorail, 6B, 581' L	5596
5,000	6	11A	1	Heater,Heat Treating,Induction	19781
5,000	7/1	East Courtyard	1	Loader Arm Hydraulic DICO 1600	15901
5,000	8	1-2	1	Furnance	
5,000	8	10-12	1	Overhead frame section	
5,000	8	30-31	1	Motor, misc piping	
5,000	8	32-33	1	Crane hook/shackle	
5,000	13	8C-9C	1	Industrial Hopper/Machine	USA 18984/MSAAP000562/Tag 131
5,000	13	15C-16C	1	Process equipment	USA 17449
5,000	13	16A-17A	2	Vibratory debur machines	
5,000	13	17C-18C	1	Industrial Machine (grinder)	USA 14365
5,000	39	S Wall	2	Lathe, heavy industrial	19948; 3652

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
5,000	39	W Wall	1	Lathe, heavy industrial	19782
5,000	39		1	Lathe, Machine THREADING Machine	21740
5,000	39		1	Lathe, Machine THREADING Machine	21741
5,000	39		1	System, Automatic Vapor Degreaser	21728
5,000	80		1	Process equipment	12397
5,000	120	L10.7	1	Heavy Industrial Machine	USA5916/LI28, 25
5,000	156		1	Heat Treating System	20186
5,000	156		1	Press, Mech.Pwr.Vert.Horning	12360
5,000	156		1	Steam Generator	20203
5,000	156		1	Steam Generator	20204
5,000	171		1	Large Bin w/ Unknown Equipment atop center	
5,000	171		2	Motor	
4,500	1	4A-6A	3	Metal bin, assorted machine components	
4,500	3/4	West Courtyard	9	Baskets, grated	
4,500	4	19A-20A N	3	Hoppers / loaders	
4,500	5	13A-15A	9	Processing equipment	
4,500	5	30A-33A	18	Shop equipment	
4,500	7/1	West Courtyard	9	Work bench / table, 6'L x 4'H x 3'W	
4,500	13	10A-11A	3	Hopper Stands	
4,450	13/171		89	Various Items	
4,000	1	19A-22A	2	Machine, heavy industrial	
4,000	1	30A-31A	3	Tanks	
4,000	3/4	West Courtyard	4	Baskets, grated	
4,000	3/4	West Courtyard	2	Coils, tubing	
4,000	4	19A-20A N	8	Framing sections	
4,000	4	31A-32A	1	Storage container, Haulaway, 25'L x 8'H x 10'W	
4,000	4	36B-37B S	8	Boxes with extra small process components	
4,000	13	3C-4C	1	Conveyor Parts, Vapor Degreaser Fan Unit, Misc	
4,000	13	16A-17A	1	Vibratory debur machine	
4,000	13	18A-19A	2	Centrifugal cleaning machines	
4,000	13	Upper 27C-28C	2	Debur machine	
4,000	15	1-4 N	1	Forklift	10170
4,000	45	1A-9A	8	Equipment components	
4,000	80		2	Forklifts	
3,750	5	17A-19A	15	Assorted machine componenets	
3,750	5	24A-27A	15	Pallet, assorted machine equipment	
3,750	5	24A-27A	15	Pallet, machine components	
3,500	4	38A-39A	14	Motor, ventilation / fan	
3,500	7/1	West Courtyard	7	Pipe racks	
3,500	13	14A-15A	1	Bluing table	
3,500	80		7	Motor components	
3,000	1	1A-4A	3	Steel beams, 10 - 15'L	
3,000	4	2A-4A N	6	Lathe threading machine component - control panels	
3,000	4	4A-7A N	2	Mechanical Press component - motors	
3,000	4	26A-28A	1	Steel structure, scaffolding, 15'L x 30'H x 8'W	
3,000	4	32B-34 S	6	Process equipment components	
3,000	4	38A-39A	2	Storage tank / hopper	
3,000	7/1	East Courtyard	3	Chutes	16037-39
3,000	7/1	West Courtyard	6	Carts	
3,000	7/1	West Courtyard	12	Pallet, assorted machine components	
3,000	8	21-22	1	Band Saw	
3,000	9	18A-19A	1	Contour projector	Tag 236
3,000	13	Upper 13C-14C	1	Chiller/misc equipment	
2,800	50	N Wall	7	Machine components, industrial	
2,500	1	1A-4A	1	Machine component, heavy	
2,500	1	4A-6A	1	Conveyor, rollers, 10'L x 3'H x 4'W	
2,500	1	37A-39A	1	Conveyors for case sealer	
2,500	3/4	East Courtyard	1	Exhaust system component	
2,500	4	4A-7A N	1	Mechanical Press component - bin	
2,500	4	37A-38A	2	Machine, unknown	
2,500	4	38A-39A	1	Tank	

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
2,500	4/5	West Courtyard	5	Lift platforms, railing	
2,500	4/5	West Courtyard	5	Cart, rolling	
2,500	5	15A	1	Machine, Tapping, Lead Screw	21832
2,500	5	21A-23A	5	Bin, assorted machine components	
2,500	5	27A-28A	1	Ultrasonic Inspection System	20356
2,500	6	1	1	Marking Machine, Dot Peen	21959
2,500	6	1	1	Press, Mech, Pierce, Flywheel	1183
2,500	6	1	1	Trimming Machine, C.C.	19769
2,500	8	4-5	1	Conveyor,Monorail	
2,500	8	5-6	1	Conveyor,Monorail	
2,500	6	11A-12A	5	Pallet, assorted machine components	
2,500	6	19N	1	Induction Heating Unit,Mouth	2759
2,500	6	Exterior	5	Processing equipment	
2,500	7/1	East Courtyard	5	Steel I-beams	
2,500	7/1	West Courtyard	3	Platform, diamond plate, stairs / railing, 8'L x 8'H x 3'W	
2,500	7/1	West Courtyard	5	Steel beam, 6'L	
2,500	7/1	West Courtyard	10	Rails / beams, 5'L	
2,500	8	2-3	1	Conveyor,Monorail	
2,500	8	13-14	2	Conveyor,Monorail, 6A,585'Long	
2,500	8	14-15	1	Grinder, Centerless, CNC	20742
2,500	8	29-30	1	Misc tooling/dyes	
2,500	9	18B-19B	1	Drilling-grinding machine	USA 3586/Tag 233
2,500	9	18B-19B	1	Drilling-grinding machine	USA 3586-1
2,500	13	5C-6C	1	Roller System with Conveyor System	USA# 18984/#00652, Model# 33D5A436K
2,500	13	20C-24C	1	Conveyor, Ceiling	LAV18028
2,500	13	21C-24C	1	Conveyor/Chute	USA16653
2,500	13	26C-27C	1	Conveyor Belt 6" wide adaptable	USA 16784
2,500	39	N Wall	1	Machine component, heavy	
2,500	39		1	BandING Press	21729
2,500	39		1	BandING Press	21730
2,500	45	9-13	1	Conveyor, Chip Collection, 96'	16036
2,500	48	1-2	1	Machine, Trimming,V & O	19779
2,500	48	1-2	1	Machine, Trimming,V & O, Trims	19777
2,500	48	1-3	1	Machine, Trimming, V & O	19952
2,500	48	5A-6A	3	Metal bin, open-sided	
2,500	49	7A-8A N	5	Fans	
2,500	80		1	Diamond Plating (250 Ft^2)	
2,500	156		1	Scrubber, Salt 2000	20066
2,400	1	22A-24A	2	Hydrostatic test machines	
2,100	4	34S-35B S	21	Cone-shaped components (on pallets)	
2,000	1	1A-4A	1	Tank, recirculating pump, 5'L x 6'H x 5'W	
2,000	1	1A-4A	1	Ventilation fan component	
2,000	1	1A-4A	2	Rectifier / solid state convertor	
2,000	1	4A-6A	1	Agitator machine, 3 tanks, pumps, P-500	
2,000	1	4A-6A	1	Chiller unit, 8'L x 4'H x 3'W	
2,000	3/4	West Courtyard	8	Steel rod - tables	
2,000	4	1A-2A N	2	Sandblaster components	21732
2,000	4	1A-2A N	1	Sandblaster component - tank/motor	
2,000	4	2A-4A N	2	Lathe threading machine component - skids	
2,000	4	2A-4A N	2	Lathe threading machine component - motor skids	
2,000	4	2A-4A N	4	Lathe threading machine component - motors	
2,000	4	17A-18A N	1	Hopper cart	
2,000	4	19A-20A N	1	Cooler	
2,000	4	22A-23A	4	Pallet, assorted machine components	
2,000	4	23A-26A	1	Steel structure, scaffolding, 30'L	
2,000	4	28A-31A	8	Workbench / table, 2 - 8'L x 2.5 - 4'H x 1.5 - 5'W	
2,000	4	34A-35A	4	Motor	
2,000	5	12A-13A	2	Crate, assorted machines, heavy industrial	
2,000	5	27A-28A	4	Pallet, assorted machine components, heavy	
2,000	5	28A-30A	8	Pallet, assorted machine components	

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
2,000	5	30A-33A	8	Shop tools / machines	
2,000	5	30A-33A	2	Bin, assorted machine components	
2,000	5	33A-34A	2	Machine / equipment	
2,000	6	13A-15A	2	Chain conveyor	
2,000	6	Exterior	20	Structure, support framework	
2,000	7/1	West Courtyard	2	Diamond plates w/ beams	
2,000	7/1	West Courtyard	8	Ladders	
2,000	8	14-15	4	Control Panels	
2,000	8	14-15	2	Conveyor components	
2,000	9	13C-15C	2	pit furnace 3' diameter	USA2765, USA2767
2,000	9	17A-18A	1	Jig Grinder	USA 033351/Tag 235
2,000	13	8C-9C	1	Feeder/Loader Machine	USA 18984/MSAAP000562
2,000	13	9A-10A	1	Control panels	
2,000	13	10A-11A	1	Danly Press Feed Conveyor Part System	USA # 17841
2,000	13	14A-15A	1	Threading machine	
2,000	13	15C-16C	1	Syntron Vibrating Coneyor	LAV-18025
2,000	13	20A-21A	8	Shelves	
2,000	13	27B-27C	8	Control Panels	
2,000	13	Upper 23C-24C	1	Hopper	
2,000	15	Exterior N	1	Forklift	
2,000	33		1	Forklift, Elec, 4000#, #153	14794
2,000	33		1	Forklift, Elec, 4000#, #409	19758
2,000	33		1	Forklift, Elec, 4000#, #409	19758
2,000	33		1	Forklift, Propane, 5000#, #212	21550
2,000	33		1	Forklift, Propane, 5150#, #93	12972
2,000	33		1	Forklift, Propane, 5300#, #155	14929
2,000	39		1	Welder	21736
2,000	39		1	Welder	21737
2,000	39		1	Welder	21738
2,000	45	1A-9A	4	Medium steel components (on pallet)	
2,000	50	N Wall	1	Pallet, assorted machine components	
2,000	120	Bay 19	2	Furnace, swindell	USA7805/USA7806
2,000	120	H8	2	Pioneer Air System	
2,000	120		2	Various Items	
2,000	171		1	Exhaust system	17947
1,500	1	1A-4A	1	Compressor	
1,500	1	1A-4A	1	Lift machine	
1,500	1	1A-4A	1	Metal bin, scrap wire / metal	
1,500	1	8A-9A	1	Metal bin, scrap / trash	
1,500	1	36A-37A	3	Cabinets	
1,500	1	37A-39A	3	Control Panels	
1,500	4	4A-7A N	3	Mechanical Press component - control boxes	
1,500	4	4A-7A N	1	Mechanical Press component - conveyor skid	
1,500	4	17A-18A N	3	Framing sections	
1,500	4	28A-31A	3	Generator	
1,500	4	29B-30B S	3	Diamond plates (8')	
1,500	4	35A-36A	10	Motor	
1,500	4	38A-39A	6	Motor, ventilation / fan	
1,500	4	38A-39A	3	Motor	
1,500	4	38B-39B S	3	Control Boxes	
1,500	8	5-6	3	Process equipment	
1,500	6	12A	1	Motor Generator, 200 KW	19783
1,500	7/1	West Courtyard	3	Electrical panel, 3.5'L x 12'H x 2'W	
1,500	7/1	West Courtyard	3	Compressed gas tanks	
1,500	8	14-15	3	Comparators	20365
1,500	13	3C-4C	1	Vapor Hood	
1,500	13	3C-4C	1	Vapor Still Control Unit	
1,500	13	9A-10A	1	Hopper Stand	USA# 17452
1,500	13	25A-26A	1	Control Panel	
1,500	13	Upper 10C-11C	1	Conveyor System - Acme Feed	USA 17840
1,500	13	Upper 18C-19C	1	Identification Machine	USA 17581

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
1,500	13	Upper 19C-20C	1	Identification Machine	USA 17602
1,500	13	Upper 20C-21C	1	Identification Machine	
1,500	13	Upper 27C-28C	1	Conveyor System	
1,500	49	6A-7A	6	Heater	
1,500	51	Lab	1	Analyzer, Gas, Infrared	20653
1,500	51	Lab	1	Corrosion Test Cabinet	19955
1,500	51	Lab	1	Heating/Cooling HVAC Unit	21792
1,500	51	Lab	1	Material Testing Machine	20496
1,500	51	Lab	1	Milling Machine, Horiz.	19946
1,500	51	Lab	1	Modular Assembly Plating Thickness Gage	21826
1,500	51	Lab	1	Sawing & Filing Machine, Band,	16995
1,500	51	Lab	1	Strength Of Materials	20500
1,500	51	Lab	1	Ultrascope	20652
1,500	51	Lab	1	Ultrasonic Flaw Detector NDT-1	17986
1,500	80		1	Furnace	
1,500	80		3	Exhaust / filters	
1,400	4	37B-38B S	7	Process equipment	
1,250	4	37A-38A	5	Motor, ventilation / fan	
1,250	5	28A-30A	5	Shop tools / machines	
1,200	9	15C-16C	1	Furnace	USA 2763/Tag 216
1,200	9	15C-16C	1	Furnace	USA 2750/Tag 215
1,200	9	15C-16C	1	Furnace	USA 17058/Tag 218
1,150	3/4	East Courtyard	23	55-gallon drums - empty	
1,100	7/1	West Courtyard	22	55-gallon drums - empty	
1,000	1	4A-6A	2	Control box, 6'L x 8'H x 3'W	
1,000	1/2	Central Courtyar	1	Chute	16652
1,000	1/2	East Courtyard	2	Dilution tank, 200G	
1,000	3/4	Center Courtyard	2	Shelving unit, 16'L x 6'H x 3'W	
1,000	3/4	East Courtyard	2	Rectangular tanks	
1,000	3/4	East Courtyard	2	Steel plates	
1,000	3/4	West Courtyard	2	Shelving units	
1,000	4	2A-4A N	1	Lathe threading machine component - loader	
1,000	4	17A-18A N	1	Hopper loader	
1,000	4	18A-19A N	2	Carts	
1,000	4	19A-20A N	1	Triangular component on pedestal	
1,000	4	20A-22A	2	Control box, electrical, 3'L x 3'H x 1.5'W	
1,000	4	23A-26A	1	Pipe, 30'L x 2'D	
1,000	4	28A-31A	1	Platform, forklift	
1,000	4	28A-31A	1	Drill press, pedestal	
1,000	4	28B-29B S	1	Process equipment components (in bin)	
1,000	4	30B-31B S	2	Motors with pedestals	
1,000	4	34A-35A	2	Motor	
1,000	4	36A-37A	2	Motor	
1,000	4	36B-37B S	2	CO_2 Pumps	
1,000	4	36B-37B S	2	Compressor filters	
1,000	4/5	West Courtyard	1	Machine, industrial, box duct	20455
1,000	5	1A-4A	10	Generator	
1,000	5	4A-6A	2	Conveyor section, rollers	
1,000	5	11A	1	Cutoff Machine, Band, Vert.	20477
1,000	5	13A	1	Machine, Trimming,V & O, Trims	19780
1,000	5	19A-21A	10	Wood bin, assorted machine components	
1,000	8	5-6	2	Steel boxes	
1,000	8	8-9	1	Compressor	
1,000	6	10B-16B	1	Tank, 5'L x 15'H x 5'W	
1,000	6	12A	1	Motor Generator, 150KW	19784
1,000	6	37C	1	Machine, Stretch Wrap	20390
1,000	6	38A	1	Manipulator, Industrial Box Handler	21292
1,000	6	Exterior	1	Washer,Industrial,Single Tun'l	14559
1,000	7/1	East Courtyard	1	Conveyor, Metal Piano Hinged B	16037
1,000	7/1	East Courtyard	1	Conveyor, Metal Piano Hinged B	16038
1,000	7/1	East Courtyard	1	Conveyor, Metal Piano Hinged B	16039

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
1,000	7/1	East Courtyard	1	Crusher, Chip, Multiapplication	15900
1,000	7/1	East Courtyard	1	Exhaust fan / furnace	
1,000	7/1	East Courtyard	1	Funnel	15900
1,000	7/1	East Courtyard	2	Carts	
1,000	7/1	West Courtyard	3	Steel structure, heavy industrial	
1,000	7/1	West Courtyard	1	Steel structure, motor scaffolding, 4'L x 7'H x 4'W	
1,000	7/1	West Courtyard	1	Support structure, steel beam, 4'L x 5'H x 3'W	
1,000	7/1	West Courtyard	2	Pipe shelves	
1,000	7/1	West Courtyard	2	Platform, 6 - 7'L x 4 - 9'W, railing	
1,000	7/1	West Courtyard	2	Cart, rolling, 2.5L x 3'H x 2.5W	
1,000	7/1	West Courtyard	4	Sawhorse, heavy industrial	
1,000	8	14-15	2	Engines / motors	
1,000	8	14-15	2	Compressor system	20366
1,000	8	25-26	6	Metal benches	
1,000	9	13C-15C	1	pit furnace 5' diameter	USA2766
1,000	9	16C	1	Furnace, Heat Treating Bath	USA 12229/Tag # 219
1,000	13	1A-1B	1	Roll-up Door	
1,000	13	2C-3C	1	Autosonics hopper/degreaser	USA 21728
1,000	13	4C-5C	1	Conveyor Belt System	
1,000	13	5C-6C	1	Metal Grating attached to Tag #130	
1,000	13	8A-9A	1	Equipment - Unknown	USA 13311
1,000	13	8C-9C	1	Conveyor ind Machine	USA 18984/MSAAP000562/Tag 131
1,000	13	10A-11A	1	Conveyor System Parts	USA # 17841
1,000	13	10C-11C	1	Magnetic Feeder	
1,000	13	11A-12A	1	Conveyor System (Part 4)	USA # 17650
1,000	13	12C-13C	4	Control Panels	
1,000	13	13A-14A	1	Conveyor System	USA 18021
1,000	13	17C-18C	1	Metal Bin w/ grinder	LAV-14365
1,000	13	19A-20A	4	Filing Cabinet	
1,000	13	19C-20C	1	Feeder Bowl	USA17684/USA17436
1,000	13	19C-20C	1	Steel Stand	USA17752/USA17751
1,000	13	23A-24A	1	Ventillation Piping	
1,000	13	26A-27A	7	Conveyor Systems Conduits	
1,000	13	26B-27B	1	Unknown Industrial Equipment	
1,000	13	Upper 11C-14C	2	Conveyor Belts attached to steel studs	
1,000	13	Upper 13C-14C	1	Misc conveyor parts, equipment	
1,000	13	Upper 15C-17C	1	Conveyor System Machine	USA 16661
1,000	13	Upper 15C-17C	1	Conveyor System Machine	USA 16666
1,000	13	Upper 17C-18C	1	Conveyor System - unknown type	USA 18569
1,000	13	Upper 17C-18C	1	Conveyor System	USA 16665
1,000	13	Upper 18C-19C	1	Conveyor System	
1,000	13	Upper 19C-20C	1	Stairs- metal	
1,000	13	Upper 19C-21C	1	Conveyor System	USA 17839/SN 16355
1,000	13	Upper 21C-22C	1	Conveyor System	
1,000	13	Upper 22C-23C	1	Basic Assembly Marchine - Rotary	USA 18409
1,000	13	Upper 23C-24C	1	Conveyor System	
1,000	13	Upper 27C-28C	1	Feed System - Stud Machine	USA 17437
1,000	39		1	Band Etching System	21731
1,000	39		1	Heater, Induction, Pillar	21742
1,000	39		1	Keyseat Slotter	21684
1,000	39		1	Robot, Industrial	21619
1,000	39		1	Stripping System, Shot Blast	21732
1,000	39		1	System, Coolant	21739
1,000	45	1A-9A	1	Conveyor component	
1,000	45	9A-14A	2	Dye presses	
1,000	48	5A-6A	2	Pallet, assorted machine components	
1,000	48	7A-8A N	2	Diamond plates	
1,000	48	10A-11A N	2	Diamond Plates	
1,000	49	6A	1	Comparator, Projection Contour	19183

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
1,000	49	7A-8A N	2	Motor components	
1,000	49	7A-8A N	2	Control Panels	
1,000	49	8A-9A	2	Fans	
1,000	50	5	1	Magnetic Particle Insp Unit	20475
1,000	50	N Wall	1	Drill press, pedestal	
1,000	51	Chem Lab	1	Analyzer, Infrared, Portable	20630
1,000	51	Chem Lab	1	Polisher/Grinder, Buelher	20495
1,000	51	Test Room	1	Microhardness Tester	20621
1,000	51	Test Room	1	Universal Camera Microscope	21920
1,000	78		2	Oil tanks	
1,000	80		1	Exhaust / furnace	
1,000	120	H8	1	Autobend 1V - Cincinnati	
1,000	120	K10.7	1	Blast Cleaning and Finishing	USA4999
1,000	171		1	Conveyor - Piano Hinged	USA 16963
1,000	171		1	Ventillation Duct	
1,000	171		1	Conveyor	USA 167165
1,000	171		1	Air Rachet	USA 17627/Tag # 157
900	5	1A-4A	9	Generator	
800	2/3	East Courtyard	16	Drum, 55G, hydraulic oil	
800	4	37B-38B S	4	Process equipment components (in tote)	
800	13	Upper 18A-19A	1	Control Panel	
800	13	Upper 27C-28C	1	Control Panel	
750	1	22A-27A	15	Filing cabinet (3 items)	
750	1	36A-37A	3	Filing cabinet	
750	1	37A-39A	3	Desk / Cabinets	
750	4	32B-34 S	3	Jacks	
750	4/5	West Courtyard	3	Pallet, hanging rack components	
750	8	6-7	3	Tables	
750	7/1	West Courtyard	3	Tank bins	
750	13	11A-12A	3	Control Panel	
750	15	1-4 N	3	Tanks, compressed gas	
750	49	7A-8A N	3	Pedestals	
750	160	A	3	Filing cabinets	
750	160	A	3	Pallet, shelving components, 10'L	
700	6	Exterior	7	Loading station, equipment	
600	4	22A-23A	3	Motor	
550	1	22A-27A	11	Filing cabinet (3 items)	
500	1	1A-4A	1	Control box, 2.5'L x 2.5'H x 1'W	
500	1	4A-6A	1	Control box, 3'L x 8'H x 1.5'W	
500	1	6A-8A	1	Railing, steel, 30'L x 5'H x 3'W	
500	1	9A-13A	1	Wood bin, heavy machine components	
500	1	9A-13A	2	Wood bin, machine components	
500	1	32A-34A	1	Bin	
500	1	36A-37A	1	Cement mixer	
500	1/2	Central Courtyar	1	A/C fan unit	19721
500	1/2	East Courtyard	1	Grated skid, railing	
500	1/2	East Courtyard	1	A/C unit, 3'L x 4.5'H x 2.5'W	
500	2/3	East Courtyard	1	Bin, rolling	
500	2/3	East Courtyard	1	Cart, rolling	
500	2/3	East Courtyard	2	Storage tank	
500	3/4	Center Courtyard	1	Steps, grated, 8'L x 3'H x 3'W	
500	3/4	East Courtyard	1	Framing section	
500	3/4	East Courtyard	1	Steel bins	
500	3/4	West Courtyard	1	Pallet, hanging grate components (14 items)	
500	3/4	West Courtyard	1	Platform, 5'L x 1.5'H x 3'W	
500	3/4	West Courtyard	1	Wall window, steel beam	
500	3/4	West Courtyard	2	Shelving unit, 10'L x 12'H x 5'W	
500	4	1A-2A N	1	Sandblaster component - control panel	
500	4	1A-2A N	1	Sandblaster component - tank/pipe	
500	4	9A-10A N	1	Bin with trash	
500	4	10A-12A N	2	Shelving units	

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
500	4	13A-14A N	1	Switchboard	
500	4	14A-15A N	1	Rotart grinder	15905
500	4	17A-18A N	1	Control panel	
500	4	19A-20A N	1	Fan	
500	4	20A-22A	1	Pipe, 8'L x 6"D	
500	4	26A-28A	1	Workbench, 7'L x 5'H x 6'W	
500	4	28A-31A	1	Metal bin, containing tiedowns / chains / hoists	
500	4	28A-31A	1	Tool chest, rolling	
500	4	28A-31A	2	Sawhorse	
500	4	28A-31A	1	Pump / motor, valves	
500	4	28B-29B S	1	Steel bin	
500	4	29B-30B S	5	8' railings	
500	4	31B-32B S	1	Motor / spool	
500	4	31B-32B S	1	Small process components (in bin)	
500	4	32B-34 S	1	Motor	
500	4	34A-35A	1	Generator	
500	4	34S-35B S	1	Engine with fan on skid	
500	4	36A-37A	1	Steel structure, scaffolding	
500	4	36B-37B S	1	Auger motor	
500	4	36B-37B S	1	Mag drive motor	
500	4	38A-39A	2	Pallet, small machine components	
500	4	38A-39A	1	Motor, ventilation/fan	
500	4	38B-39B S	1	Compressor	
500	4	38B-39B S	2	Pallets with misc small process components	
500	4/5	East Courtyard	1	Platform, 8'L x 1.5'H x 5'W	
500	4/5	West Courtyard	1	Lift platform, ladder	
500	5	22A-23A	1	Gage, Precision Thickness	21881
500	5	30A-33A	10	Filing cabinet	
500	5/6	East Courtyard	1	Tent structure, pole, 20'L x 10'H x 10'W	
500	8	5-6	2	Tables	
500	8	6-7	1	Drill & Pedestal	
500	6	Exterior	1	Conveyor	20335
500	6	Exterior	1	Machine component, exhaust	
500	6	Exterior	5	Conveyor section, rollers	
500	7/1	East Courtyard	1	Diamond Plating (150 Ft^2)	
500	7/1	East Courtyard	2	Motor components	
500	7/1	West Courtyard	1	Control box, 4'L x 7'H x 2'W, rolling cart	
500	7/1	West Courtyard	1	Conveyor component	
500	7/1	West Courtyard	1	Exhaust funnel	
500	7/1	West Courtyard	1	Machine component, gears	
500	7/1	West Courtyard	1	Machine, 6'L x 8'H x 2.5'W	
500	7/1	West Courtyard	1	Mesh bin w/ misc small steel components	
500	7/1	West Courtyard	1	Pallet, scrap, heavy industrial	
500	7/1	West Courtyard	1	Pile, assorted equipment components	
500	7/1	West Courtyard	1	Platform, diamond plate, 5'L x 3'H x 4'W	
500	7/1	West Courtyard	1	Platform, drum, 55G	
500	7/1	West Courtyard	1	Roll-up door	
500	7/1	West Courtyard	1	Steel table	
500	7/1	West Courtyard	1	Storage tank, 2.5'L x 4'H x 2.5'W, machine components	
500	7/1	West Courtyard	1	Storage unit, grated, 15'L x 7'H x 3'W	
500	7/1	West Courtyard	1	Vacuum filtration unit	
500	7/1	West Courtyard	1	Cart, machine equipment	
500	7/1	West Courtyard	1	Cart, rolling, grated metal	
500	8	2-3	1	Tank, cut in half	
500	9	4A-5A	1	Tool Grinder	Tag 199
500	9	16C	1	Furnace, Metal Heat Treat Box, Electric	USA 4129/Tag 217
500	13	4C-5C	1	Dryer/Refrigerator	
500	13	4C-5C	1	Compressor	
500	13	4C-5C	1	Water Chiller	
500	13	5A-6A	1	Edison Workbench	
500	13	5C-6C	1	Control Panel	None

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
500	13	5C-6C	1	Riser with stairs	
500	13	10A-11A	1	Conveyor system components	USA 17841
500	13	11A-12A	1	Work Bench	
500	13	11A-12A	2	Work Bench	
500	13	12C-13C	1	Control Panel - Danly	USA CA58
500	13	13A-14A	1	Cabinet	USA 16791-1
500	13	13A-14A	1	Hot Water Rinser	Tag #135
500	13	13A-14A	1	Control Panel	USA 17851/SN# PS-123-66
500	13	24A-25A	1	Wooden Bin with metal pipes	
500	13	24A-25A	1	Piece of green conveyor belt	
500	13	24C-25C	1	Industrial Machine Conveyor	LAV16627
500	13	24C-25C	1	Industrial Machine Conveyor	LAV16628
500	13	24C-25C	1	Industrial Machine Conveyor	LAV18023
500	13	26B-27B	1	Oven	USA 17599/Tag 208
500	13	26B-27B	1	Conveyor Belt System	
500	13	26B-27B	2	Hanging Lamps - Fallen on equipment	
500	13	27B-27C	1	Air conditioner stand	USA 16689
500	13	Upper 18C-19C	1	Riser	
500	13	Upper 21C-22C	1	Cabinet	
500	13	Upper 22B-23B	1	Unknown equipment	USA 18409/2
500	13	Upper 22C-23C	1	Unknown equipment	USA 7422/2
500	15	1-2 S	1	Condensor (in trench)	
500	15	1-2 S	1	Welding tank compressor	13498
500	15	1-2 S	1	Control Panel	
500	15	1-2 S	1	Disassembled heater	
500	15	2-3 S	1	Tool cage (20' x 8')	
500	15	4-5 N	1	Drill & Pedestal	
500	15	4-5 S	1	Cart	
500	15	Exterior N	1	Engine hoist - 2000 lbs	
500	15	Exterior N	1	Scraper	7765
500	39	E Wall	1	Machine, heavy industrial	2506
500	39	E Wall	1	Control box, 7'H	
500	39	N Wall	1	Band saw	19960
500	39	N Wall	1	Drill press, pedestal	2879
500	39	W Wall	1	Cart, rolling	
500	45	1A-9A	1	Steel box of spare coils	
500	45	1A-9A	2	Heavy steel cylinders	
500	45	9A-14A	1	Framing section	
500	48	5A-6A	1	Pallet, machine components	
500	48	6A-7A	1	Conveyor, 8'L x 5'H x 2.5'W	
500	48	6A-7A	1	Fan, industrial	
500	48	6A-7A	1	Machine component, heavy	
500	48	6A-7A	1	Platform, 8'L x 2'H x 5'W	
500	48	6A-7A	1	Ramp, 8'L x 7'H x 1.5'W	
500	48	7A-8A N	1	Bin	
500	48	10A-11A N	1	Compressor system	
500	48	10A-11A S	1	Bin	
500	48	10A-11A S	1	Steel pipe pile (in bin)	
500	48	10A-11A S	1	Cart	
500	49	7A-8A N	1	Control Panels	
500	49	7A-8A N	1	Exhaust component	
500	49	7A-8A N	1	Jack footing	
500	49	7A-8A N	1	Skid	
500	49	8A-9A	1	Metalligraph	287
500	49	8A-9A	1	Skid	
500	50	N Wall	1	Generator	
500	51	Lab	1	Eddy Current Harness Tester	19184
500	51	Lab	1	Eddy Current Tester Programmab	18411
500	51	Lab	1	Electromagnetic Inspection Uni	20656
500	51	Lab	1	Electromagnetic Inspection Uni	20657
500	51	Lab	1	Electromagnetic Inspection Uni	20658

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
500	51	Lab	1	Electromagnetic Inspection Uni	20659
500	51	Lab	1	Electromagnetic Inspection Uni	20660
500	51	Lab	1	Electromagnetic Inspection Uni	20661
500	51		1	Drill & Pedestal	20498
500	51		1	Grinder	8435
500	51		1	Process equipment	19946
500	51		1	Testing equipment	
500	51		1	Cabinet	
500	51		1	Drill & Pedestal	390
500	80	SALV	1	Industrial Plant Varnish Strip	5309
500	80		1	Bin	
500	80		1	Cart	
500	80		1	Exhaust component	
500	80		1	Small components pile (in bin)	
500	80		1	Control Panels	
500	80		2	Tables	
500	120	E8	1	Unknown	USA 7986
500	120	F8	1	Tank w/ valves	
500	160	A	1	Machine components, steel rotary	
500	160	A	2	Pallet, ammunition boxes (50 items)	
500	171		1	Conveyor System w/ 2 control panels	
500	171		2	Control Panel	
450	1/2	East Courtyard	3	Ladder, wall-mounted	
400	1	4A-6A	2	Control box	
400	4	37A-38A	2	Pallet, small motors	
400	4	38A-39A	2	Pallet, small motors	
400	5	4A-6A	8	Grates, 8'L	
400	5	10A-12A	2	Pallet, assorted machine components	
400	6	Exterior	4	Conveyor section, rollers	
400	13	25A-26A	4	Metal duct wrapped in plastic	
400	33	Exterior	4	Bin, scrap wood / trash	
375	5	24A-27A	15	Lights, overhead	
350	5	33A-34A	7	Filing cabinet	
300	6	17A-19A	3	Control box, 4'L x 8'H x 1.5'W	19765; 10414; 19767
300	13	4A-5A	1	Coolent Tank Chiller	Tag #1
300	50	N Wall	3	Load station	
250	1	1A-4A	1	Desk	
250	1	4A-6A	1	Railing structure, ladder, 5'L x 7'H x 2.5'W	
250	1	36A-37A	1	Table	
250	3/4	West Courtyard	1	Pallet, grates	
250	4	18A-19A N	1	Railing	
250	4	18A-19A N	1	Switchboard	
250	4	26A-28A	1	Ladder / light structure	
250	4	26A-28A	1	Test station, PVC, 3'L x 5'H x 3'W	
250	4	28A-31A	1	Control box, electrical, 3'L x 12'H x 2'W	
250	4	28A-31A	1	Grinder, pedestal	
250	4	28A-31A	1	Pallet jack	
250	4	28A-31A	1	Stepladder, 6'H	
250	4	34S-35B S	1	Small process components (in bin)	
250	4	35A-36A	1	Steel structure, 4'L x 4'H x 2'W	
250	4	35A-36A	1	Motor, Vibco	
250	4	38B-39B S	1	I-beam, 4'x4'	
250	4/5	West Courtyard	1	Metal bin	
250	4/5	West Courtyard	1	Metal pallet, railing	
250	4/5	West Courtyard	1	Pile, hanging rack components	
250	8	3-4	1	Table	
250	7/1	West Courtyard	1	Lockers, 3'L x 7'H x 2'W	
250	7/1	West Courtyard	1	Metal bin, shallow	
250	7/1	West Courtyard	1	Pile, scrap, long equipment pieces	
250	7/1	West Courtyard	1	Sheet rack	
250	7/1	West Courtyard	1	Steel framing sections	

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
250	7/1	West Courtyard	1	Structure, steel, railings, 3'L x 4'H	
250	7/1	West Courtyard	1	Tank cart	
250	8	14-15	1	Table saw	
250	13	4A-5A	1	Metal Lockers, Cabinets	
250	13	4A-5A	1	Metal Gate Piece	
250	13	5A-6A	1	Cabinet	
250	13	7A-8A	1	Spayer-Alkota	USA 19160
250	13	7A-8A	1	Unknown equipment	
250	13	8A-9A	1	Pallet with hose fan, wheels for USA 13311	USA 13311
250	13	8A-9A	1	Pallet with equipment	SN: FP1U873754
250	13	8A-9A	1	Cabinet	USA 18676
250	13	8A-9A	1	Cabinet	USA 14821
250	13	8A-9A	1	Unknown	
250	13	8A-9A	1	Workbench	USA 8714
250	13	11A-12A	2	Control Panel	
250	13	11A-12A	1	Desk	
250	13	11A-12A	1	Control Panel	
250	13	12C-13C	1	Work Bench	
250	13	13A-14A	1	Riser	
250	13	14A-15A	1	Unknown metal equip - Lubrication System	
250	13	14A-15A	1	Metal Debris	
250	13	15A-16A	1	Drawers	
250	13	15A-16A	1	Pallet with various metal parts	
250	13	16A-17A	1	Control Panel	
250	13	18A-19A	1	Cabinet	
250	13	18A-19A	1	Scale - Pratt & Whitney	SN: 2554
250	13	21A-22A	1	Industrial Equipment with electrical cord	
250	13	24A-26A	1	Duskolector	USA 3639 / SN: 62278
250	13	24A-26A	1	Duskolector	
250	13	24A-26A	1	Duskolector	USA 3644/ SN: 6283
250	13	24A-26A	1	Duskolector	
250	13	24A-26A	1	Duskolector	USA 3631/ SN: 6280
250	13	24A-26A	1	Duskolector	USA 2854/ SN: 6245
250	13	24A-26A	1	Duskolector	
250	13	24A-26A	1	Duskolector	
250	13	25C-26C	1	Safety Shower	
250	13	25C-26C	1	Cabinet	
250	13	25C-26C	1	Table	
250	13	26B-27B	1	Pump Controller - Rogers	
250	13	26B-27B	1	Control Panel	
250	13	26B-27B	1	Unknown Industrial Equipment	
250	13	26B-27B	1	Workstation	
250	13	26C-27C	1	Pallet w/ metal stands	
250	13	26C-27C	1	Conveyor System	
250	13	27A-28A	1	Industrial equipment - unknown	
250	13	Upper 10C-11C	1	Metal scrap	
250	13	Upper 11C-12C	1	Stand - Steel w/ 4x4 sp tube acme trim	USA 17755
250	13	Upper 12C-13C	1	Stand - Steel w/ 4x4 sp tube acme trim	USA 17753
250	13	Upper 13C-14C	1	Stand - Steel w/ 4x4 sp tube acme trim	USA 17756
250	13	Upper 18A-19A	1	Workbench	
250	13	Upper 20C-21C	1	Control Panel	
250	13	Upper 21C-22C	1	Workbench w/ drawers	
250	15	1-2 S	1	Filing cabinet	
250	15	1-2 S	1	Shelving unit	
250	15	1-4 N	1	Shelving unit, 3'L x 7'H x 2'W	
250	15	2-3 S	1	Shelving unit	
250	15	4-5 N	1	Grinder w/ pedestal	
250	15	4-5 N	1	Spark plug service box	
250	15	4-5 N	1	Tire changer	
250	15	4-5 S	1	Lift truck-scooter	
250	15	4-5 S	1	Tire rack	

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
250	31		1	Locker cabinet	
250	32		1	Locker cabinet	
250	34		1	Filing cabinet	
250	39	E Wall	1	Heating unit	
250	39	E Wall	1	Machine component	
250	39	E Wall	1	Shelving unit	
250	39	S Wall	1	Shelving unit	
250	39	W Wall	1	Metal bin, metal shavings	
250	39	W Wall	1	Metal bin, open-sided, empty	
250	48	5A-6A	1	Motor, stirring rod, 6'L	
250	48	5A-6A	1	Stair, broken, 4'L x 4'H x 3'W	
250	48	5A-6A	1	Wood bin, metal hanging racks (50 count)	
250	48	10A-11A N	1	Table	
250	49	6A-7A	1	Filing cabinet, drawers	
250	171		1	Control Panel	
250	171		1	Control Panel	
250	171		1	Conveyor Belt wide w/ cleats	USA 15431
250	171		1	Filing Cabinet	USA 5399
250	171		1	Filing Cabinet	USA 18466
250	171		1	Heat Treater	
250	171		1	Water Piping	
200	4	38A-39A	1	Wood bin, assorted machine components	
200	5	15A-16A	2	Workbench, rolling	
200	5	17A-19A	2	Bin	
200	5	19A-21A	2	Bin, assorted machine components	
200	6	13A-15A	2	Grease trap, 5'L x 3'H x 2'W	
200	6	13A-15A	2	Lathe cartridge case	
200	6	24A-31A	2	Work table	
200	7/1	West Courtyard	1	55-gallon drums - kerosene	
200	45	1A-9A	2	Fan motors	
200	50	S Wall	2	Load station	
200	50	W Wall	2	Lockers, 8'L x 7'H x 2'W	
150	2/3	East Courtyard	3	Drum, 55G, empty	
150	4	28A-31A	3	Tool chest	
150	15	1-4 N	3	Drum, 55G, hydraulic / motor oil, grease	
150	15	3-4 S	1	Ladder	
150	49	6A-7A	3	Fan, industrial	
140	7/1	West Courtyard	14	Fire extinguisher	
120	1	37A-39A	6	Jacks	
120	49	6A-7A	6	Racks, 7'L	
100	4	19A-20A N	1	Compressor	
100	5	1A-4A	1	Pallet, assorted machine components / grates	
100	5	28A-30A	1	Pallet, scrap / trash	
100	6	11A-12A	1	Workbench, rolling	
100	6	15A-16A	1	Crate, 5'L x 7'H x 3'W	19961
100	6	17A-19A	1	Bin, scrap metal / trash	
100	6	17A-19A	1	Tank, Shell gasoline, 3'L x 5'H x 3'W	
100	6	17B-18B	1	Pile, pipe (12 items)	
100	6	19A-20A	1	Control box, wall-mounted, 3.5'L x 4.5'H x 1.5'W	
100	6	19A-20A	1	Load station	
100	6	32A	1	Control box, electrical	
100	48	8A-9A N	2	Engine components (in wood box)	
100	49	6A-7A	2	Fan, industrial	
100	50	N Wall	1	Assorted machine componenets	
100	50	S Wall	1	Bin, scrap / trash	
90	1	29A-30A	9	Lights, overhead	
80	1	36A-37A	4	A/C fan units	
60	1	36A-37A	3	Stools	
60	4	38A-39A	3	Benches	
50	1	13B-15B	1	Fencing structure, 12'L x 8'H	
50	1	32A-34A	1	Eyewash	

Table B-2.1 Non-Fixed Painted Equipment
Disposal: Landfill Disposal or Paint Removal/Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Asset Number
50	1/2	East Courtyard	1	Drum, 55G, empty	
50	4	28A-31A	1	Drum, 55G, containing wire	
50	4	28A-31A	1	Engine, oil containers	
50	4	31B-32B S	1	Filing cabinets	
50	6	24A-31A	2	Eye wash station	
50	7/1	West Courtyard	1	Fan, industrial	
50	15	1-4 N	2	Workbench, 8'L x 4'H x 3'W	
50	15	1-4 N	1	Eye wash station	
50	15	2-3 S	1	55-gallon drum - empty	
50	15	3-4 S	1	55-gallon drum w/ rags	
50	39	E Wall	1	Drum, 55G, empty	
40	4	19A-20A N	2	Bins of small components	
40	4	20A-22A	2	Pallet, assorted machine components	
40	5/6	East Courtyard	2	Ladder, 8 - 10'L	
40	7/1	West Courtyard	2	Stools	
30	4/5	East Courtyard	3	Spool, electrical wire	
25	5	12A-13A	1	Pallet, lights / lamps	
25	5	17A-19A	1	Pallet, lights / lamps	
25	6	17A-19A	3	Folding chair	
25	6	24A-31A	1	Fan, industrial	
25	6	32A	1	Light, standing	
20	1	13B-15B	1	Pipe, 8'L x 3"D	
20	2/3	East Courtyard	1	Bucket	
20	2/3	East Courtyard	1	Wagon, toy	
20	3/4	Center Courtyard	1	Coat rack, hanging	
20	3/4	Center Courtyard	1	Eye wash station	
20	4	26A-28A	1	Motor, valve	
20	4	28A-31A	1	Ladder	
20	4	31A-32A	1	Stepladder	
20	4	34A-35A	1	Drip tray / trap	
20	4	35A-36A	1	Pallet, assorted machine components	
20	4/5	East Courtyard	1	Pallet, assorted machine components	
20	7/1	West Courtyard	1	Cart, rolling	
20	7/1	West Courtyard	1	Heating unit	
20	15	1-2 S	1	Various small maintenance equipment	
20	15	1-4 N	1	Pallet, assorted machine components	
20	15	1-4 N	1	Shelf	
20	15	2-3 S	1	Appliance cart	
20	15	2-3 S	1	Car jack	
20	15	2-3 S	1	Lawnmower	
20	15	2-3 S	1	Propane tank (20-gallon)	
20	15	2-3 S	1	Various small maintenance equipment	
20	15	2-3 S	1	Various small tools	
20	15	3-4 S	1	30-gallon drum w/ lube oil	
20	15	3-4 S	1	Gas can	
20	15	4-5 S	1	Eye wash kit	
20	21		1	Control Panels	
20	39	W Wall	1	Plastic bin, assorted machine parts	
20	48	6A-7A	1	Wood bin, assorted small metal components	
20	48	10A-11A N	1	Pedestal	
10	1	1A-4A	1	Spool, electrical wire	
10	1	8A-9A	1	Stool	
10	1	13B-15B	1	Pile, machine components	
10	1	13B-15B	1	Trash can	
10	39	N Wall	1	Ventilation tube, tarp, 4'L	
4,551,240				**Total Non-Fixed Painted Equipment (Tons): 2,276**	

2276 tons

Equipment that may contain oils

Table B-2.2 Non-Painted Equipment
Disposal: Landfill Disposal or Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description
80,000	1/2	West Courtyard	400	Mesh bins
40,000	7/1	West Courtyard	200	Steel pipes
37,500	3/4	East Courtyard	15	Equipment components
15,000	6	Exterior	75	Storage bin, grated
10,000	3/4	West Courtyard	10	Mesh baskets
10,000	4	32A-34A	80	Scrap metal, 20'L x 5'W
10,000	6	10A-17A	1	Grated conveyor, overhead, 150'L x 3'H x 3'W
10,000	7/1	West Courtyard	20	Diamond plate, heavy industrial, sheets, 0.5" thick
7,500	7/1	West Courtyard	15	Diamond plate, heavy industrial, sheets, 0.5" thick
7,000	6	Exterior	35	Storage bin
6,000	4	31A-32A	30	Pipes, 20 - 25'L x 1 - 4"D
5,000	7/1	West Courtyard	10	Grates, 60 items
5,000	7/1	West Courtyard	25	Sheets
5,000	171		2	Storage Holding Metal piping w/ nozzle
4,750	13/171		19	Various Items
4,500	7/1	West Courtyard	9	Steel pipes
4,000	3/4	West Courtyard	4	Mesh baskets
4,000	13	2A-3A	1	A/C Units, misc items
4,000	13	2C-3C	1	Conveyor Parts, Vapor Degreaser Fan Unit, Misc
4,000	13	26A-27A	8	Metal Pipes
4,000	45	1A-9A	8	Extra small steel components (on pallet)
4,000	50	Overhead	1	Conveyor, grated, overhead, 120'L x 3'H x 2'W
3,200	4	4A-7A N	8	Mechanical Press component - 15' pipes
2,500	13/171		5	Various Items
2,000	3/4	Center Courtyard	1	Platform, 24'L x 16'W
2,000	6	24A-31A	1	Drainage grate, sections, 140'L total
1,600	6	23A-24A	8	Pallet, grates
1,500	1	32A-34A	3	Extra small steel components (in wood bin)
1,500	2/3	East Courtyard	30	Skids, steel
1,500	4	31A-32A	1	Structure, scaffold
1,500	160	A	1	Ventilation / fan machine, industrial
1,000	3/4	West Courtyard	5	Corrugated siding
1,000	4	36B-37B S	1	Reboiler
1,000	5/6	East Courtyard	1	Storage tank, 12'H x 5'D
1,000	7/1	West Courtyard	2	Tank, 4'L x 5'H x 4.W
1,000	13	9C-10C	1	Metal Grated Stairs
1,000	13	10C-11C	1	1 Pile Conveyor Belt
1,000	13	16A-17A	4	Cabinets - various sizes 2 - 4 '
1,000	13	26C-27C	4	Cart - wood and metal with metal parts
1,000	13/171		20	Various Items
1,000	49	7A-8A N	2	Steel cylinders
1,000	171		1	Pallet w/ metal rods (`100)
800	1/2	East Courtyard	4	Pile, rods, 5 - 8'L x 2"D
800	2/3	East Courtyard	4	Skids, steel
800	5	1A-4A	2	Bin
800	7/1	West Courtyard	4	Fencing, chainlink
750	4	31B-32B S	1	Air Compressor
750	7/1	West Courtyard	3	Sheet racks
600	7/1	West Courtyard	3	Bin, 3'L x 4'H x 3'W
600	7/1	West Courtyard	12	Sheets
600	48	7A-8A N	12	Steel grates
600	49	7A-8A N	3	Steel pipe bundles
500	1/2	East Courtyard	1	Pile, rods, 8'L x 2"D
500	3/4	East Courtyard	1	Shelving units
500	3/4	East Courtyard	1	Steel pipe pile
500	4	14A-15A N	1	25' steel pipe/beam bundle
500	4	32A-34A	1	Davet
500	4	32A-34A	1	Grate

Table B-2.2 Non-Painted Equipment
Disposal: Landfill Disposal or Scrap

Estimated Weight (lbs)	Building	Building Section	Quantity	Description
500	4	36B-37B S	2	H_2O Chillers
500	4/5	West Courtyard	1	Metal bin
500	7/1	East Courtyard	1	Steel pipe pile
500	7/1	West Courtyard	1	Metal bin, half tank, 0.5" thick, steel
500	7/1	West Courtyard	1	Platform
500	7/1	West Courtyard	1	Platform, grated, 6'L x 6'W, hanging
500	7/1	West Courtyard	1	Steel beam
500	7/1	West Courtyard	1	Steel coil / conduit pipe
500	8	14-15	1	Bins
500	13	9A-10A	1	Crate with Two large metal dyes
500	13	14A-15A	2	Hot Water Tank
500	13	14A-15A	2	Hot Water Tank
500	13	17A-18A	1	Industrial Pipe Clamp
500	13	24A-25A	1	Industrial Pipe Holder Part
500	45	1A-9A	1	Framing section
500	120	E9.2	1	Equipment
500	120	E9.2	1	Equipment
500	120	E9.2	1	Equipment
500	171		2	Pallet - metal piping with nozzle
500	171		1	Pallets with metal tubes w/ nozzle labeled "good old tubes"
400	1/2	East Courtyard	2	Rod, 15'L x 2"D
400	3/4	West Courtyard	2	Steel pipes
400	4	30B-31B S	2	Steel pipes
400	7/1	West Courtyard	2	Fence gate, chainlink
400	15	3-4 S	1	Fan w/ pedestal
300	13	26A-27A	3	Metal duct wrapped in plastic
280	13/171		28	Various Items
250	4	36B-37B S	1	Boiler / filter
250	13	12C-13C	1	Metal Pipe
250	13	14A-15A	1	Trash Can full of gravel on pallet w/ various metel debris
250	13	15A-16A	1	Crate 3104
250	13	16A-17A	1	Super Micrometer - Collins
250	13	16A-17A	1	Internal supermicrometer
250	13	25C-26C	1	Duct
250	13	26B-27B	1	Machine
250	13	26B-27B	1	Cabinet
250	13	26C-27C	1	Pipe Fastener
250	13	27A-28A	1	Metal grating
250	13	Upper 10C-11C	1	Coil - wrapped in drop-cloth
250	13	Upper 13C-14C	1	Standing Lamp
250	13	Upper 22B-23B	1	Stairs
250	171		1	Conveyor Chain
200	1	36A-37A	1	Extra small steel components (on pallet)
200	3/4	West Courtyard	1	Fencing, chainlink
200	3/4	West Courtyard	1	Pipe, 12'L x 6"D
200	3/4	West Courtyard	1	Pipe, 5'L x 4"D
200	3/4	West Courtyard	1	Steel grating on pallet
200	4	31B-32B S	1	Steel pipe bundle
200	6	17B-18B	1	Fence posts, aluminum, 6'H (20 items)
200	6	19A-20A	1	Drainage grate, 8'L x 1'W
200	7/1	East Courtyard	1	Steel bar pile
200	7/1	West Courtyard	1	Corrugated siding, stacked, 10 items
200	15	2-3 S	1	Fan w/ pedestal
200	48	10A-11A S	1	Steel fittings pile (in wood bin)
200	50	S Wall	1	Storage tank, underground
50	7/1	West Courtyard	1	Cart
10	3/4	Center Courtyard	1	Machine, equipment
338,640		**Total Non-Fixed Bare Metal (tons): 169**		

169 tons

Table B-2.3 Miscellaneous Porous/Trash Items
Disposal: TSCA Landfill

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Material
375	5	21A-23A	15	Drum, 55G, scrap / trash	Cardboard
105	48	6A-7A	70	Boxes, empty	Cardboard
90	48	5A-6A	60	Boxes, empty	Cardboard
69	48	6A-7A	46	Cylinders, 4'H x 10"D	Cardboard
27	1	19A-22A	18	Boxes, empty	Cardboard
18	48	6A-7A	12	Boxes, empty	Cardboard
14	39	N Wall	14	Boxes, cartridge case	Cardboard
3	49	6A-7A	2	Pallet, scrap / trash	Cardboard
2	49	6A-7A	1	Box, 4'L x 3'H x 4'W	Cardboard
50	7/1	West Courtyard	1	Urinal	Ceramic
2,000	1	32A-34A	1	Concrete pile (in bin)	Concrete
1,500	7/1	West Courtyard	5	Stacked concrete	Concrete
500	6	Exterior	1	Tank, 600G	Fiberglass
200	4	37A-38A	4	Insulation, rolls	Fiberglass
100	4	38A-39A	2	Insulation, rolls	Fiberglass
80,000	6	23A-31A	1	Zinc Plating Machine	Mixed
25,000	3/4	Center Courtyard	1	Structure, corrugated metal siding, 45'L x 20'H x 40'W	Mixed
20,000	3/4	West Courtyard	1	Structure, corrugated metal siding, 20'L x 12'H x 30'W	Mixed
7,500	4	13A-14A N	5	Press components	Mixed
5,000	4	10A-12A N	6	Pallets with misc equipment, conveyor parts	Mixed
5,000	6	20 OS PAD	1	Nitrogen Storage Tank	Mixed
4,000	3/4	Center Courtyard	1	Structure, corrugated metal siding, 16'L x 6'H x 3'W	Mixed
4,000	13/171		16	Various Items	Mixed
3,000	4	35A-36A	2	Shelving unit, 10'L x 15'H x 5'W	Mixed
3,000	13/171		12	Various Items	Mixed
2,500	3/4	Center Courtyard	1	Structure, corrugated metal siding, 10'L x 8'H x 5'W	Mixed
2,200	48	8A-9A N	11	Adapters (in wood box)	Mixed
2,150	160	A	43	Pallet, chain lubricant	Mixed
2,000	6	18C	1	Conveyor, Flex Chain, 16'L	Mixed
2,000	6	18C-19N	1	Conveyor, Flex Chain, 20'6"L	Mixed
2,000	6	18S-19N	1	Conveyor, Flex Chain, 33'L	Mixed
2,000	13	4C-5C	8	Overhead lights	Mixed
1,500	15	4-5 S	1	Floor sweeper	Mixed
1,000	3/4	West Courtyard	1	Wood and sheet metal shelter	Mixed
1,000	4	38A-39A	2	Shelving unit, 10'L x 15'H x 5'W	Mixed
1,000	6	19N-20C	1	Conveyor, Flex Chain, 29'6"L	Mixed
1,000	6	35-38	1	Conveyor System, Roller, Pack	Mixed
1,000	13	12C-13C	4	55-gallon drums with plastic pieces	Mixed
1,000	82		50	Misc office supplies	Mixed
750	4	18A-19A N	5	Boxes of office supplies	Mixed
750	13/171		3	Various Items	Mixed
750	15	3-4 S	1	Golf cart	Mixed
750	21		1	Refrigerator	Mixed
500	4	34A-35A	1	Shelving unit, 10'L x 15'H x 5'W	Mixed
500	4	38A-39A	1	Autoclave	Mixed
500	5	17A-19A	10	Table	Mixed
500	7/1	West Courtyard	1	Electrical equipment, insulators	Mixed
500	7/1	West Courtyard	1	Platform, bin	Mixed
500	8	14-15	1	Comparator Projection Contour	Mixed
500	13	5A-6A	1	Shop Machine - Unknown	Mixed
500	13	15A-16A	2	Trash cans filled w/aggregate	Mixed
500	13	15A-16A	2	Cabinet - metal and wood	Mixed
500	15	4-5 N	1	Pesticide sprayer w/ tank	Mixed
500	171		1	Workbench w/ attached motor	Mixed
400	1	27A-29A	8	Wood bin, scrap / trash	Mixed
400	48	10A-11A N	20	Flourescent light fixtures	Mixed
360	1	32A-34A	18	5-gallon buckets clay pack	Mixed
300	4	9A-10A N	6	Overhead light fixtures with control boxes	Mixed
300	4	31B-32B S	15	Boxes of misc office supplies	Mixed
300	4	34A-35A	2	Pallet, assorted machine components	Mixed
300	7/1	West Courtyard	3	Electrical components	Mixed

Table B-2.3 Miscellaneous Porous/Trash Items
Disposal: TSCA Landfill

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Material
250	4	38A-39A	1	Oven / kiln	Mixed
250	5	33A-34A	5	Wood bin, scrap / trash	Mixed
250	5	34A-38A	40	Pallet, assorted office equipment	Mixed
250	5	34A-38A	5	Pallet, assorted office equipment	Mixed
250	5	34A-38A	12	Pallet, assorted office equipment	Mixed
250	7/1	West Courtyard	5	Metal / glass window frames	Mixed
250	13	4A-5A	1	Wooden Sign w/ metal stand	Mixed
250	13	4C-5C	1	55-gallon drum - Rags and Gloves	Mixed
250	13	5A-6A	1	Crate #3726 w/ debris and squeegee, etc.	Mixed
250	13	5C-6C	1	Work bench with vice and misc. metal parts	Mixed
250	13	5C-6C	1	Crate #449 w/ chair parts, etc.	Mixed
250	13	9A-10A	1	Pallet with metal parts and particle board desk	Mixed
250	13	9A-10A	1	Crate with rags and oily filter	Mixed
250	13	11A-12A	1	Crate # 4888 with debris and tools	Mixed
250	13	11A-12A	1	Create # 4767 Unknown	Mixed
250	13	11A-12A	1	Pallet with Misc. Metal and Plastic Parts	Mixed
250	13	11A-12A	1	Desk - metal and wood	Mixed
250	13	12C-13C	1	Crate #4921 - Gauges and Debris	Mixed
250	13	15A-16A	1	Pallet with fans, metal cart, various pails, etc.	Mixed
250	13	18A-19A	1	Pallet with variuos debris and metal parts	Mixed
250	13	22A-23A	1	Desk - metal and wood	Mixed
250	13	25C-26C	1	Parts Warmer	Mixed
250	13	26B-27B	1	Crate 2069 w/ various wood metal electronic debris	Mixed
250	13	26B-27B	1	Workbench - wood and metal w/ lamp	Mixed
250	13	26C-27C	1	Workbench - metal w/ various cables on top	Mixed
250	13	27A-28A	1	Cabinet - wood containing numberous metal parts	Mixed
250	13	Upper 21C-22C	1	55-gallon drum w/ trash and rags	Mixed
250	13	Upper 23C-24C	1	Cabinet - wood various metal debris	Mixed
250	25		5	Office chairs	Mixed
250	171		1	Railing - wood and metal	Mixed
250	171		1	Pallet with rubber hose	Mixed
240	4	19A-20A N	12	Boxes of light fixtures	Mixed
200	7/1	West Courtyard	2	Assorted equipment, hoses, rollers	Mixed
200	7/1	West Courtyard	4	Rubber / steel pipes	Mixed
180	13/171		36	Various Items	Mixed
150	49	7A-8A N	3	Hosing piles	Mixed
125	4	10A-12A N	5	Boxes of office supplies	Mixed
120	4	9A-10A N	6	Boxes with misc wires	Mixed
100	1	13B-15B	2	Wood bin, 3.5"L x 1.5'H x 2.5'W, assorted hoses	Mixed
100	1	13B-15B	5	Coils, firehose	Mixed
100	4	17A-18A S	1	Fence, sliding door	Mixed
100	4	31B-32B S	5	Boxes of paint	Mixed
100	4	37A-38A	2	Shelving unit	Mixed
100	7/1	West Courtyard	1	Cart	Mixed
100	7/1	West Courtyard	1	Concrete posts, tubing	Mixed
100	7/1	West Courtyard	2	Platform, 10'L x 5'W	Mixed
100	15	1-4 N	1	Golf cart	Mixed
100	39	W Wall	1	Drum, 55G, scrap / trash	Mixed
100	82		5	Office chairs	Mixed
80	4	31A-32A	4	Pallet, assorted tarps / containers	Mixed
75	1	29A-31A	15	Boxes, lamp components	Mixed
70	4	26A-28A	14	Batteries	Mixed
70	15	1-4 N	14	Assorted lubricants / cleaner	Mixed
60	1	13B-15B	3	Coils, firehose	Mixed
60	4	28A-31A	3	Pallet, assorted shop tools / parts	Mixed
60	15	1-4 N	3	Assorted oil / grease	Mixed
50	4	28A-31A	5	Shop tools	Mixed
50	4	28A-31A	1	Pallet, assorted chains / straps / shackles	Mixed
50	4	28A-31A	1	Pallet, assorted shop tools / parts	Mixed
50	4	28A-31A	1	Pallet, protective gear	Mixed
50	4	36B-37B S	1	Sliding gate	Mixed

Table B-2.3 Miscellaneous Porous/Trash Items
Disposal: TSCA Landfill

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Material
50	4	37A-38A	1	Wire, spool	Mixed
50	7/1	West Courtyard	1	Platform, 4.5'L x 1.5'H x 3.5'W	Mixed
50	7/1	West Courtyard	1	Workbench, 12'L x 4'H x 4'W	Mixed
50	15	1-2 S	1	Misc Paperwork / Manuals	Mixed
50	15	1-4 N	10	Shop tools / batteries	Mixed
50	15	1-4 N	1	Suspended hose, overhead	Mixed
50	15	4-5 S	1	Pallet of hosing	Mixed
50	39	E Wall	1	Workbench	Mixed
50	39	N Wall	1	Pallet, scrap / trash	Mixed
50	48	10A-11A N	1	Insulated drywall sheet	Mixed
50	48	10A-11A N	1	Misc wire pile	Mixed
50	49	6A-7A	1	Machine, stirring rod and engine	Mixed
50	82	N WALL TOP	1	Sampler, Automatic, Portable	Mixed
40	1	1A-4A	2	Coils, hose	Mixed
40	1	9A-13A	2	Coils, firehose	Mixed
40	4	38A-39A	2	Batteries	Mixed
40	7/1	West Courtyard	2	Coil, wire	Mixed
40	15	1-2 S	2	Office chairs	Mixed
40	48	10A-11A N	2	5-gallon buckets - lube oil	Mixed
30	1	8A-9A	6	Window screens	Mixed
30	15	1-4 N	6	Assorted lubricants / fuel / batteries	Mixed
25	4	30B-31B S	1	Box of solvent cans	Mixed
25	6	13B-14B	1	Crate, buckets (sodium hydroxide)	Mixed
20	1	13B-15B	1	Sack, soda ash	Mixed
20	1	19A-22A	1	Drum, 55G, scrap / trash	Mixed
20	3/4	West Courtyard	1	Coil, industrial hose, 2"D	Mixed
20	4	23A-26A	1	Pallet, assorted scrap / trash	Mixed
20	7/1	West Courtyard	1	Bench, padded	Mixed
20	15	2-3 S	1	Small cleaning supply cans	Mixed
20	15	3-4 S	1	Golf cart charger	Mixed
20	15	3-4 S	1	Sprayer cart	Mixed
20	15	4-5 S	1	Battery charger	Mixed
20	15	4-5 S	1	Spill kit	Mixed
20	48	10A-11A N	1	Oil can	Mixed
81,000	4	20A-22A	27	Sack, polyester flake	Plastic
8,000	7/1	West Courtyard	40	PVC pipes	Plastic
7,500	1	37A-39A	150	Plastic bins	Plastic
7,200	3/4	East Courtyard	12	Totes	Plastic
2,000	4	31B-32B S	1	2500-gallon tank	Plastic
1,900	160	A	38	Tank, oil	Plastic
1,300	13	4A-5A	13	Spill Containment Pallets	Plastic
1,250	78		25	Oil buckets	Plastic
1,200	4	22A-23A	6	Sack, polyester flake	Plastic
750	6	Exterior	1	Bundle, plastic, 4'L x 4'H x 4'W	Plastic
500	3/4	East Courtyard	10	55-gallon drums - empty	Plastic
400	48	10A-11A N	8	Misc equipment	Plastic
400	50	S Wall	1	Storage tank	Plastic
350	4	28A-31A	7	Buckets, unknown chemicals	Plastic
300	1	6A-8A	6	Pipes, PVC, 30'L x 3"D	Plastic
300	15	1-4 N	6	Drum, 55G, scrap / trash	Plastic
250	1	6A-8A	5	Pipe, curved, 8 - 10'L x 2.5'D	Plastic
200	1	37A-39A	1	Plastic pile in wood box	Plastic
200	1/2	East Courtyard	1	Storage tank, 400G, grated metal skid	Plastic
200	4	22A-23A	4	Drum, 55G	Plastic
200	7/1	West Courtyard	1	Cooling tower	Plastic
200	13	27B-27C	2	Air conditioning Unit	Plastic
150	1	36A-37A	3	55-gallon drums - empty	Plastic
150	2/3	East Courtyard	3	Bucket, oil / lubricant	Plastic
150	4	20A-22A	3	Drum, 55G, polyester flake	Plastic
150	4	22A-23A	3	Pallet, assorted plastics and drum	Plastic
150	4	28B-29B S	3	55-gallon drums - trash	Plastic

Table B-2.3 Miscellaneous Porous/Trash Items
Disposal: TSCA Landfill

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Material
150	4	34A-35A	1	Packaging bands, spool	Plastic
150	7/1	West Courtyard	3	55-gallon drums - empty	Plastic
150	49	7A-8A N	3	Dual cylinder plastic tubes	Plastic
100	1	1A-4A	2	Tank, 2'D	Plastic
100	1	6A-8A	2	Ventilation tubing, 25'L	Plastic
100	4	34A-35A	2	Tarp, bundles	Plastic
100	6	13B-14B	1	Drum, 55G, unknown chemicals	Plastic
100	15	3-4 S	2	Cones	Plastic
100	32		2	55-gallon drums - trash	Plastic
100	48	10A-11A N	2	55-gallon drums - empty	Plastic
100	49	7A-8A N	2	10-gallon nalgene bottles	Plastic
50	1	6A-8A	1	Pipe, branched, 8'L x 1.5'D	Plastic
50	1	13B-15B	1	Drum, 55G, Hyde Cleaner	Plastic
50	2/3	East Courtyard	1	Drum, 55G, scrap / trash	Plastic
50	3/4	West Courtyard	1	Artillery casing tubes	Plastic
50	3/4	West Courtyard	1	Pallet, cannon projectile cases	Plastic
50	4	9A-10A N	1	Plastic monitor	Plastic
50	4	17A-18A N	1	Plastic screen	Plastic
50	4	18A-19A N	1	Tote	Plastic
50	4	20A-22A	1	Pallet, assorted plastic items	Plastic
50	4	28A-31A	1	Drum, 55G, scrap / trash	Plastic
50	4	29B-30B S	1	Sack of plastic scraps	Plastic
50	4	31B-32B S	1	55-gallon drum - empty	Plastic
50	4/5	West Courtyard	1	Drum, 55G, polyester flake	Plastic
50	5/6	East Courtyard	1	Drum, 55G, empty	Plastic
50	7/1	West Courtyard	1	Grease / oil trap, 5'L x 2'H x 4.5'W	Plastic
50	7/1	West Courtyard	1	Storage tank, 4'H x 2.5'D	Plastic
50	15	2-3 S	1	Drum spill containment	Plastic
50	15	2-3 S	1	Ladder	Plastic
50	15	3-4 S	1	Ladder	Plastic
50	15	3-4 S	1	Trash bin	Plastic
50	37		1	55-gallon drum - trash	Plastic
10	5/6	West Courtyard	1	Box, flashlights	Plastic
10	7/1	West Courtyard	2	Bin	Plastic
10	48	6A-7A	2	Bin	Plastic
1,500	15	4-5 N	30	Used tires	Rubber
650	15	4-5 S	13	Used tires	Rubber
150	15	Exterior E	3	Hoses	Rubber
100	15	Exterior S	2	Hoses	Rubber
50	15	1-2 S	1	Tire	Rubber
3,000	171		30	Pallet with plating dry racks (`12 each)	Rubber and metal
1,500	13	Upper - throughout	15	Plating racks with plating racks through 13 upper level	Rubber and metal
9,000	7/1	West Courtyard	180	Pallets	Wood
1,250	37		25	Pallets	Wood
1,200	7/1	West Courtyard	12	Power line pole	Wood
1,000	1	37A-39A	20	Wood boxes	Wood
1,000	7/1	West Courtyard	100	Pallet	Wood
1,000	33	Exterior	40	Pallet	Wood
1,000	48	10A-11A N	20	Pallets	Wood
1,000	49		20	Crate	Wood
800	7/1	West Courtyard	8	Wood 2" x 10" x 20'	Wood
800	13/171		8	Various Items	Wood
750	6	34A	15	Ammo boxes, 2'L x 2'H x 3'W	Wood
750	48	10A-11A S	15	Wood boxes	Wood
600	160	A	6	Storage cabinet	Wood
560	13/171		28	Various Items	Wood
500	13/171		2	Various Items	Wood
500	45	9A-14A	10	Wood boxes	Wood
500	49		25	Pallet	Wood
500	80		5	Wood boxes	Wood
350	6	11A-12A	7	Bin, 3'L x 5'H x 2.5'W	Wood

Table B-2.3 Miscellaneous Porous/Trash Items
Disposal: TSCA Landfill

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Material
300	4	34A-35A	3	Lumber, bundles, 12'L x 2"H x 4"W	Wood
300	7/1	West Courtyard	3	Wood boxes	Wood
300	7/1	West Courtyard	6	Wood bin, 5'L x 3'H x 4'W	Wood
300	13	21A-22A	3	Wooden Cabinets	Wood
300	80		3	Shelving units	Wood
250	8	5-6	5	Tables	Wood
250	7/1	East Courtyard	1	Shelving units	Wood
250	8	2-3	5	Pallets	Wood
250	13	18A-19A	1	Work Bench	Wood
250	25		5	Office tables	Wood
250	45	1A-9A	5	Wood boxes	Wood
250	82		15	Shelving units	Wood
250	82		5	Desks	Wood
210	4/5	West Courtyard	21	Pallet	Wood
200	8	2-3	2	Wood boxes	Wood
200	13	8A-9A	2	Crates	Wood
200	13	20A-21A	2	Cabinets - wood	Wood
200	13	26C-27C	2	Wooden Pallet	Wood
200	13	27A-28A	2	Shelves	Wood
200	15	Exterior N	1	ER Trailer	Wood
200	49	6A-7A	20	Lumber, wood sheets	Wood
150	4	31B-32B S	3	Desks	Wood
150	5	17A-19A	3	Crate	Wood
150	8	4-5	3	Platform	Wood
150	25		3	Bookcases	Wood
150	34		3	Shelving units	Wood
150	80		3	Tables	Wood
120	4	28A-31A	12	Broomsticks	Wood
100	1	13B-15B	2	Lumber, 10'L x 4"H x 2"W	Wood
100	1	37A-39A	1	Shelving units	Wood
100	1	37A-39A	1	Wood boxes	Wood
100	2/3	East Courtyard	2	Cart, rolling	Wood
100	3/4	Center Courtyard	2	Doors, broken	Wood
100	4	23A-26A	1	Workbench, 6'L x 7'H x 2'W	Wood
100	4	23A-26A	2	Office desk, chair	Wood
100	4	26A-28A	1	Workbench, 15'L x 4'H x 3'W	Wood
100	4	36A-37A	1	Pallet, 20'L x 10'W	Wood
100	13	5B-6B	1	Wooden Belt	Wood
100	13	5C-6C	1	Desk	Wood
100	13	8A-9A	1	Cabinet	Wood
100	13	15A-16A	1	Pallet on top of Crate 3104	Wood
100	13	19A-20A	1	Work Bench w/ plastic cup containing oily fluid and unkn	Wood
100	13	22A-23A	1	Cabinet	Wood
100	13	25C-26C	1	Table	Wood
100	13	26C-27C	1	Cabinet - wood	Wood
100	13	Upper 10C-11C	1	Desk - wood w/ debris and cardboard boxes	Wood
100	13	Upper 18A-19A	1	Workbench	Wood
100	13	Upper 21C-22C	1	Workbench	Wood
100	15	1-2 S	1	Wood office cubicle	Wood
100	15	1-4 N	1	Storage cabinet	Wood
100	15	2-3 S	2	Shelving units	Wood
100	39	Cage	1	Storage cabinet	Wood
100	48	8A-9A N	2	Wood boxes	Wood
100	49	8A-9A	2	Wood boxes	Wood
100	160	A	1	Scrap / trash pile	Wood
100	171		1	Workbench	Wood
100	171		1	Crate - wood marked granade gages	Wood
100	171		1	Workbench w/ box of recorder charts	Wood
90	48	6A-7A	9	Pallet	Wood
80	4	26A-28A	8	Pallet	Wood
80	48	5A-6A	8	Pallet	Wood

Table B-2.3 Miscellaneous Porous/Trash Items
Disposal: TSCA Landfill

Estimated Weight (lbs)	Building	Building Section	Quantity	Description	Material
60	5/6	East Courtyard	6	Pallet	Wood
50	1	4A-6A	1	Wood crate, 5'L x 5'H x 6'W	Wood
50	1	37A-39A	1	Cabinet	Wood
50	1	37A-39A	1	Desk	Wood
50	1	37A-39A	1	Shelving units	Wood
50	4	26A-28A	1	Office desk, chair	Wood
50	4	31B-32B S	1	Bookcases	Wood
50	4/5	West Courtyard	1	Wood bin, 5'L x 3'H x 4'W	Wood
50	8	3-4	1	Table	Wood
50	8	14-15	1	Table	Wood
50	15	1-2 S	1	Desk	Wood
50	15	1-4 N	1	Oil / lube station, front counter, 8'L x 5'H	Wood
50	15	4-5 N	1	Corkboard	Wood
50	24		1	Desk	Wood
50	48	6A-7A	1	Pallet, lumber / wood sheets	Wood
50	48	8A-9A N	1	Cardboard pile (in wood box)	Wood
50	160	A	1	Storage cabinet	Wood
40	24		4	Bookcases	Wood
30	49	6A-7A	3	Lumber, wood sheets	Wood
25	13/171		5	Various Items	Wood
365,798				**Total Trash (tons): 183**	

183 tons

APPENDIX C
WORK SEQUENCE AND APPROACH

WORK SEQUENCE AND APPROACH

EQUIPMENT REMOVAL PROJECT
RIVERBANK ARMY AMMUNITION PLANT

Riverbank, California

January 2013

Prepared for

Riverbank Local Redevelopment Authority
Riverbank, California

Prepared by

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ABBREVIATIONS AND ACRONYMS

µg/100 cm^2	microgram per 100 square centimeters
EPA	U.S. Environmental Protection Agency
HAZWOPER	Hazardous Waste Operations and Emergency Response
mg/kg	milligrams per kilogram
PCB	polychlorinated biphenyl
RAAP	Riverbank Army Ammunition Plant
RCRA	Resource Conservation and Recovery Act
TSCA	Toxic Substances Control Act
Weston	Weston Solutions, Inc.

1. PURPOSE

The purpose of this description of field work activities is to provide an overview of the planned approach to remove and dispose of equipment and miscellaneous waste located within several buildings at the former Riverbank Army Ammunition Plant (RAAP) Production Area in Riverbank, California (Figures 1 and 2). This work sequence and approach document is provided in response to Condition B.8.a of the TSCA risk-based disposal approval and amendment received by the U.S. Army from the U.S. Environmental Protection Agency (EPA)[1]. This work will be performed as the initial step of a Toxic Substances Control Act (TSCA) risk-based polychlorinated biphenyl (PCB) cleanup at the former RAAP. This phase of work will consist of cleaning equipment surfaces of dust that may be contaminated with PCBs, dismantling or size-reducing equipment as required, and removing the equipment from the buildings for disposal at a permitted landfill or recycle as scrap. If economically feasible, painted equipment may be cleaned to bare metal to allow for disposal as scrap. Miscellaneous wastes such as unused bulk chemicals will be collected for disposal at an appropriate permitted facility.

The RAAP was originally constructed as an aluminum reduction plant and operated from 1943 to 1944. In the early 1950s the plant was modified to produce steel munitions casings. The RAAP was designated as a Base Realignment and Closure facility in 2005 and completed its mission in May of 2009. The Riverbank Local Redevelopment Authority took over maintenance and operations for the facility on April 1, 2010. Conveyance of the facility from the U.S. Army to the City of Riverbank is anticipated to take place in 2013 through an early transfer as defined under the Comprehensive Environmental Response, Compensation, and Liability Act. The removal of materials and equipment containing PCBs located within a portion of the RAAP will be performed prior to the early transfer under the provisions of TSCA. The Army has applied to the EPA for a risk-based PCB cleanup to remove the buildings' contents. The risk-based cleanup and disposal of equipment will be conducted in accordance with the EPA Region IX Phase 1 Approval letter dated September 4, 2012, as amended in a letter dated October 29, 2012 and an

[1] EPA Region IX Phase 1 Approval letter dated September 4, 2012, as amended in a letter dated October 29, 2012 and an email dated December 13, 2012 (Sampling and Analysis Plan, Appendix A)

email dated December 13, 2012. The work will be performed consistent with EPA requirements, TSCA, and this document.

Equipment inventories were conducted in 2011 and 2012 to estimate the weights of large presses and other equipment that may have been impacted by PCBs released from degradation of Galbestos siding and roofing panels. The estimated equipment totals are 5,082.5 tons for the presses and 2,628 tons for other equipment (2,276 tons of painted metal, 169 tons of bare metal, and 183 tons of miscellaneous porous/trash items). In addition to the equipment to be removed, miscellaneous chemicals were encountered during the inventory process, including unused drummed chemicals, which will be characterized, packaged, and transported for disposal at an appropriate disposal facility. Other wastes will also be removed from equipment, e.g., glycol from radiators, motor oil from crankcases, and hydraulic fluids, which will be characterized, drained, packaged, and transported for disposal at appropriate disposal facilities.

2. SUMMARY OF PROJECT FIELD TASKS

Following mobilization, equipment will be removed from the designated RAAP buildings, decontaminated of dust, segregated in staging areas, sampled, and transported off-site for landfill disposal or recycle as scrap. The site layout is presented in Figure 2 and a more detailed view showing equipment removal routes through the buildings is shown in Figure 3. The overall duration of the field work associated with equipment removal is estimated to require six months. The estimated Phase 1 project schedule is included as Figure 4.

A limited number of presses from Building 8 may be cleaned during a subsequent phase of the project to allow continued use at Riverbank in a commercial/industrial setting. There are no other plans for reuse of RAAP equipment. There are no plans to send equipment to a smelter or scrap metal recovery oven for disposal. It is anticipated that the bulk of the equipment will be disposed in an out-of-state TSCA landfill. Equipment may be sampled to allow disposal in an in-state landfill or recycle as unregulated metal scrap. In some situations, paint may be removed from painted metal equipment to allow recycle as unregulated metal scrap. Efforts to recycle or dispose a portion of the equipment in an in-state landfill are consistent with project sustainability and green remediation objectives. The cleaning and disposal options are described in more detail

below. Health and safety protection requirements and procedures are provided in the Accident Prevention Plan / Site-Specific Safety and Health Plan.

2.1 MOBILIZATION AND SITE SET-UP

Equipment and personnel required for the Phase 1 effort will be transported to the former RAAP. An administration area will be set up, and OSHA hazardous waste worker (HAZWOPER) and site-specific personnel training will be conducted.

Exclusion safety zones will be established within portions of the buildings where equipment removal activities will commence. Only authorized and trained personnel will be located within the exclusion zones. Exclusion zones will be modified as the project progresses and as appropriate to minimize the disturbance of operations for existing tenants.

With the exception of Buildings 1 and 6, most or all of the equipment to be removed has been relocated to the eastern portion of the Production Buildings. Because of height restrictions within the "western corridor" that connects the western end of Buildings 1 through 7 and within the "Broadway corridor" that connects the midpoint of these buildings, equipment within Buildings 1 through 6 will be moved from the Production Area Buildings eastward into Building 8 and from there will be moved south to the rollup door at the southern end of Building 8 (Figure 3). Equipment in Buildings 13 and 171 will be moved outside those buildings along the adjacent railroad track corridor, as shown on Figure 3, to minimize impact to tenants. A pressure-washing station will be set up outside of the rollup door at the eastern end of Building 8 for decontamination of painted and unpainted metal equipment. Scales for weighing the equipment and a wastewater pre-treatment system will also be located nearby (Figure 3). The pressure-washing station and scales may later be relocated as shown on Figure 3 to decontaminate equipment removed from Buildings 13 and 171. Rinsate generated by the removal of contaminated dust from the small equipment and the process lines will be pre-treated using filtration and activated carbon. Treated water will be stored in steel tanks, periodically sampled, and recycled to the pressure-washing decontamination station.

Staging areas will be established south of Building 6 for removed equipment prior to sampling and transportation off-site for recycle or disposal.

Trucks will access the site though the truck entrance gate at Gate 10 using the designated truck route (Figure 2). Trucks exiting the equipment staging area will pass through a tire cleaning station to remove potentially contaminated soil using dry-brush or water methods.

2.2 EQUIPMENT REMOVAL

This section describes the sequence of tasks to be performed during equipment removal.

2.2.1 Air Monitoring

Two stationary air monitoring stations will be established inside the building(s) near locations where work is conducted. One station, located within the exclusion zone, will be used to collect continuous samples daily during working hours and analyzed on a weekly basis for PCBs (collected using a low-flow pump per National Institute for Occupational Safety and Health Method 5503) and asbestos in particulates. The second station, which will utilize a high-flow pump to collect PCB samples (per EPA Method TO-4A), will be located outside the exclusion zone and will collect samples once each month while field activities are in progress. The stationary air stations will be relocated as the work progresses through the buildings. In addition, a personal air monitor measuring particulates in real time (pDR-1000 or equivalent) will be assigned to one of the work crews each day.

2.2.2 Vacuum Floors

The main thoroughfares of the buildings will be vacuumed prior to and periodically during the removal of equipment to mitigate the potential for spreading PCB-contaminated dust and to remove biological hazards such as rodent and/or bird droppings. Crews will use vacuums equipped with high-efficiency particulate air filters to remove standing dust prior to, and as needed, during removal operations. Bagged dust will be staged for disposal at a TSCA-approved landfill.

2.2.3 Remove Chemicals

Chemicals and potentially hazardous materials are located in portions of the facility. These chemicals will be moved to a centralized staging area. Qualified personnel will characterize, package, and dispose of chemicals in accordance with applicable regulations. Materials that can

be recycled, such as lead core batteries, will be reclaimed and recycled. Materials regulated under TSCA such as PCBs will be disposed as required by TSCA regulations, while materials that, by their waste characteristics, are defined as California or Resource Conservation and Recovery Act (RCRA) hazardous waste will be disposed of at appropriate permitted disposal facilities.

2.2.4 Drain Fluids from Equipment

Hydraulic fluids from the presses and other hydraulically operated equipment will be sampled and analyzed for PCBs as part of the inventory process. Hydraulic fluids will be drained and consolidated prior to equipment removal. Lubricating oils from abandoned forklifts and other rolling stock will also be drained and analyzed for PCBs. After waste profiling, waste oil will be recycled (provided PCBs are not detected) or disposed at a TSCA-approved facility.

2.2.5 Remove and Pressure-Wash Equipment

Smaller Equipment and Debris. The equipment removal operation will commence as the equipment transportation route for each building has been vacuumed. Plastic sheeting will be hung at the perimeter of the work areas to mark exclusion zones and minimize the potential for spread of dust. However, the plastic sheeting will not obstruct the "western" or "Broadway" corridors. Forklift crews will first retrieve items not requiring size-reduction for off-site transportation to recycling or disposal facilities and transport them to the decontamination station where a crew will remove the surficial dust from non-porous (i.e., metal) items by pressure-washing. The rinse water from this operation will be contained, treated, and recycled. Painted equipment with significant weight or high scrap value (e.g., copper) may be cleaned of paint using chemical stripping or abrasive blasting to the NACE #2 standard and staged for possible recycling if economically viable. Small equipment that can be moved by forklift will be staged as follows:

1. Unpainted metal will be transported to the decontamination station for pressure-washing and/or other cleaning, weighed, and staged with other unpainted metal in the staging area.
2. Painted metal will be transported to the decontamination station for pressure-washing and/or other cleaning, weighed, and staged with other painted metal in the staging area.
3. Painted metal that is stripped of paint will be staged with unpainted metal.

4. Porous trash will be staged together for disposal at a TSCA-approved landfill.

Large/Fixed Equipment. Once an area has been cleared of debris and small equipment that can be moved by forklifts without size-reduction, the production lines, which consist of large ovens, paint spray booths, presses, and other large equipment, will be dismantled and/or cut into manageable pieces using standard demolition equipment such as plasma cutters, torches, and excavator-mounted hydraulic shears. Painted equipment with significant weight may be cleaned of paint using chemical stripping or abrasive blasting to the NACE #2 standard and staged for possible recycling if practical. Large non-fixed equipment and fixed equipment will be staged as follows:

1. Unpainted metal will be transported to the decontamination station for pressure-washing and/or other cleaning, weighed, and staged with other unpainted metal in the staging area.
2. Painted metal will be transported to the decontamination station for pressure-washing and/or other cleaning, weighed, and staged with other painted metal in the staging area.
3. Painted metal that is stripped of paint will be staged with unpainted metal.

Equipment inventories were conducted in 2011 and 2012 to estimate the weights of large presses and other equipment that may have been impacted by PCBs released from degradation of Galbestos siding and roofing panels. The estimated equipment totals are 5,082.5 tons for the presses and 2,628 tons for other equipment (2,276 tons of painted metal, 169 tons of bare metal, and 183 tons of miscellaneous trash items). A limited number of presses within Building 8 may remain for on-site reuse at RAAP in a commercial/industrial setting. These presses will be sampled and decontaminated at a later time if required. The other presses will be dismantled or size reduced and moved by qualified riggers using forklifts and cranes for off-site recycling or disposal.

2.3 SAMPLING FOR LANDFILL DISPOSAL OR RECYCLE AS SCRAP

Equipment or other materials will be segregated into the following three categories:

1. Unpainted metal or metal stripped of paint
2. Painted metal
3. Porous trash and miscellaneous waste

Wipe samples will be collected from materials containing unpainted metal or metal stripped of paint at a frequency of 5 samples per every 250 tons (the frequency specified by the in-state landfill for disposal of waste with PCB concentrations less than 50 mg/kg). If the results are greater or equal to 10µg/100cm^2 but less than 100µg/100cm^2, the waste will be transported for disposal to a permitted in-state landfill. If the results are greater or equal to 100µg/100cm^2, the waste will be transported for disposal to a TSCA-approved landfill. If it becomes apparent that this waste stream consistently requires disposal at a TSCA-approved landfill, sampling will be reduced to the minimum required by the landfill for profiling.

If wipe sample results are less than 10µg/100cm^2, the following additional sampling may be performed to allow disposal by a scrap metal recycler. A minimum of 10% of items (initial subgroup) in each group will be sampled. If PCB concentrations are below 10µg/100cm^2 in all items comprising the initial subgroup, then no additional sampling will be performed for that group of items and the items will be cleared for recycle as scrap. If PCBs are detected at or above 10µg/100cm^2 in any of the items in the initial subgroup, a second 10% of items (second subgroup) not yet tested and remaining in the group will be tested using wipe samples. If PCB concentrations are below 10µg/100cm^2 in all of the second subgroup items, then only the initial subgroup items that failed the wipe test will be re-cleaned. If PCBs are detected at or above 10µg/100cm^2 in any if the second subgroup items, then all remaining equipment will be re-cleaned in addition to the items in the second subgroup that failed the wipe tests; and a minimum of 20% of the re-cleaned items (third subgroup) will be sampled using wipe samples to allow clearance for recycle as scrap.

Five-point composite paint samples will be collected from the painted metal at a frequency of 1 sample per every 250 tons. If the results are less than 50 mg/kg, the waste will be transported for disposal to a permitted in-state landfill. If the results are greater or equal to 50 mg/kg, the waste will be transported for disposal to a TSCA-approved landfill. If it becomes apparent that this waste stream consistently requires disposal at a TSCA-approved landfill, sampling will be reduced to the minimum required by the landfill for profiling.

If the results are less than 1 mg/kg, the waste may be sampled further to allow recycle as scrap. Verification sampling will be performed (10% initial subgroup, 10% second subgroup with

disposal in a permitted landfill of any initial group items that fail if all items in the second group are less than 1 mg/kg, or disposal in a permitted landfill of the entire group if there are failures of the second group).

Bags of bulk dust, porous trash, and cleanup wastes will be transported to a TSCA-approved landfill without sampling (or at the minimum rate required by the landfill for profiling).

2.4 TRANSPORTATION AND DISPOSAL

Once sample results have been obtained, trucks will be loaded for disposal or recycle as scrap. Records will be maintained for quantities of materials that are recycled. Waste manifests will be used to track and document disposal at municipal or TSCA landfills.

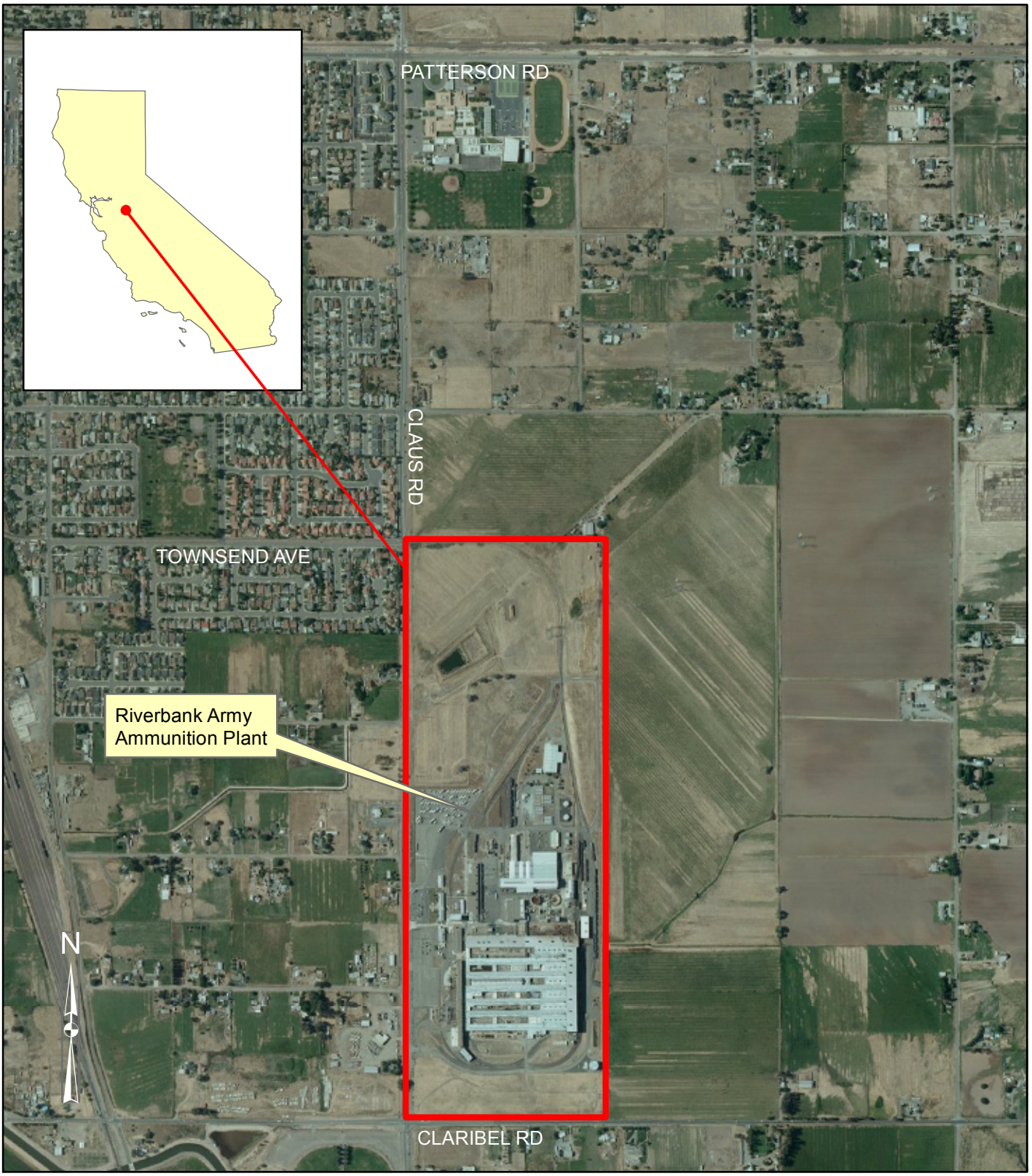
Trucks will enter the site at Gate 10 and follow the route shown on Figure 2. Upon leaving the equipment staging area, trucks will pass through a tire cleaning station where potentially contaminated dirt will be removed, as required, using dry-brush or wet methods.

2.5 DEMOBILIZATION

Rental equipment used during the project will be wipe-tested to confirm that no residual PCB contamination remains (e.g., results greater than 10µg/100cm^2) prior to demobilization.

The treated water remaining in the wastewater pretreatment system will be sampled and discharged to the Riverbank Wastewater Treatment Plant. Media will be disposed at a TSCA-approved landfill and the vessels will be wipe tested to confirm that no residual PCB contamination remains (e.g., results greater than 10µg/100cm^2).

FIGURES

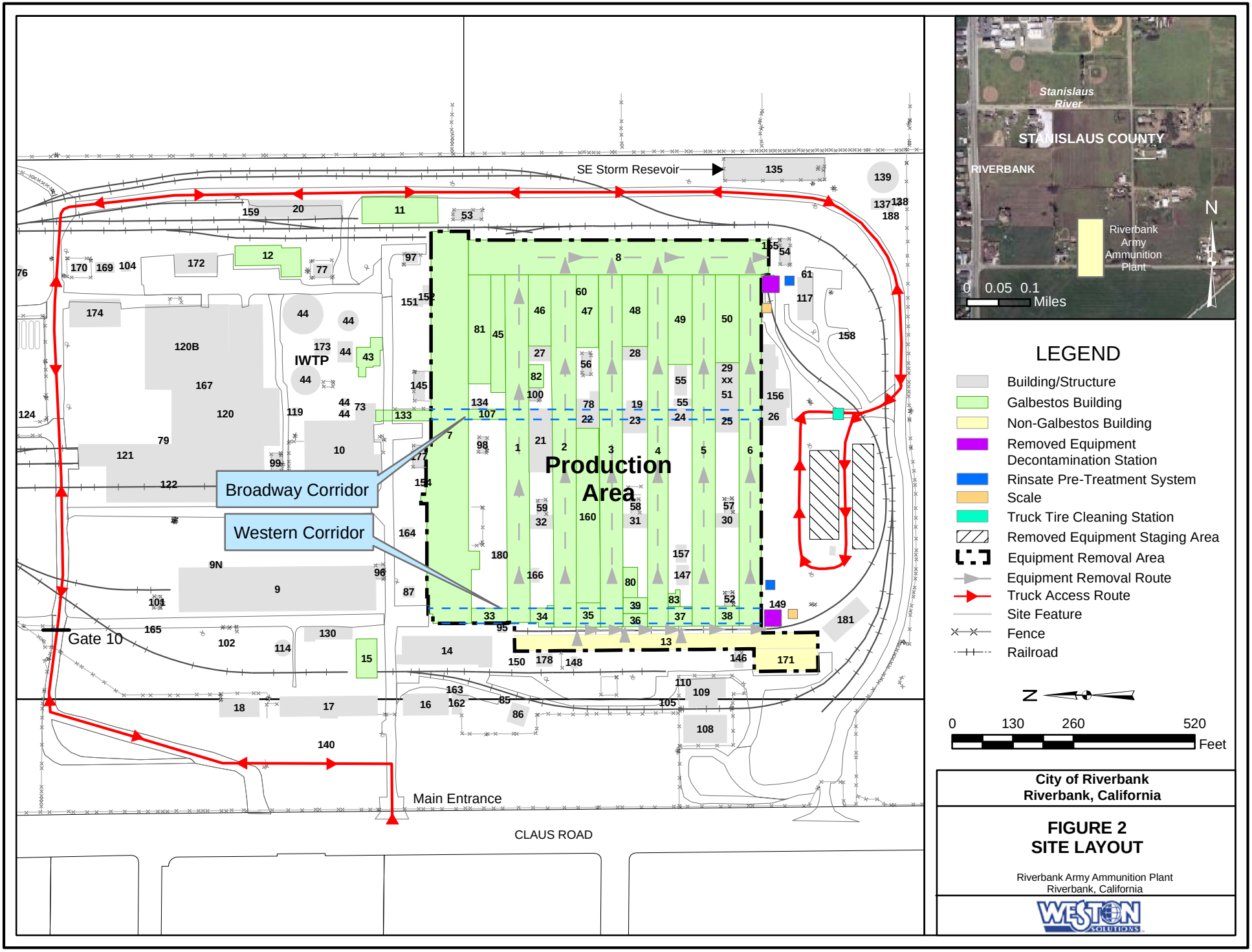


City of Riverbank
Riverbank, California

FIGURE 1
VICINITY MAP

Riverbank Army Ammunition Plant
Riverbank, California

WESTON SOLUTIONS

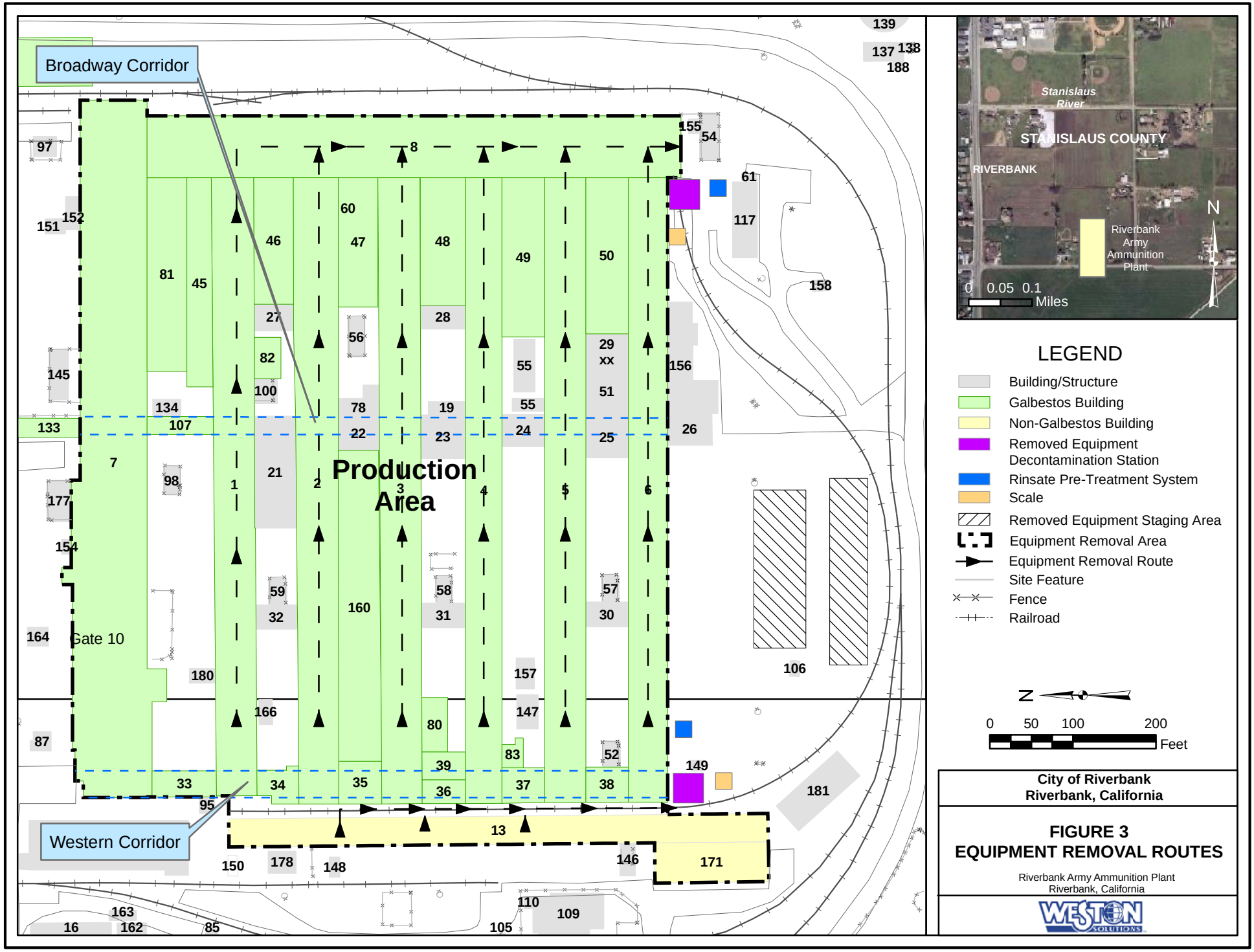


City of Riverbank
Riverbank, California

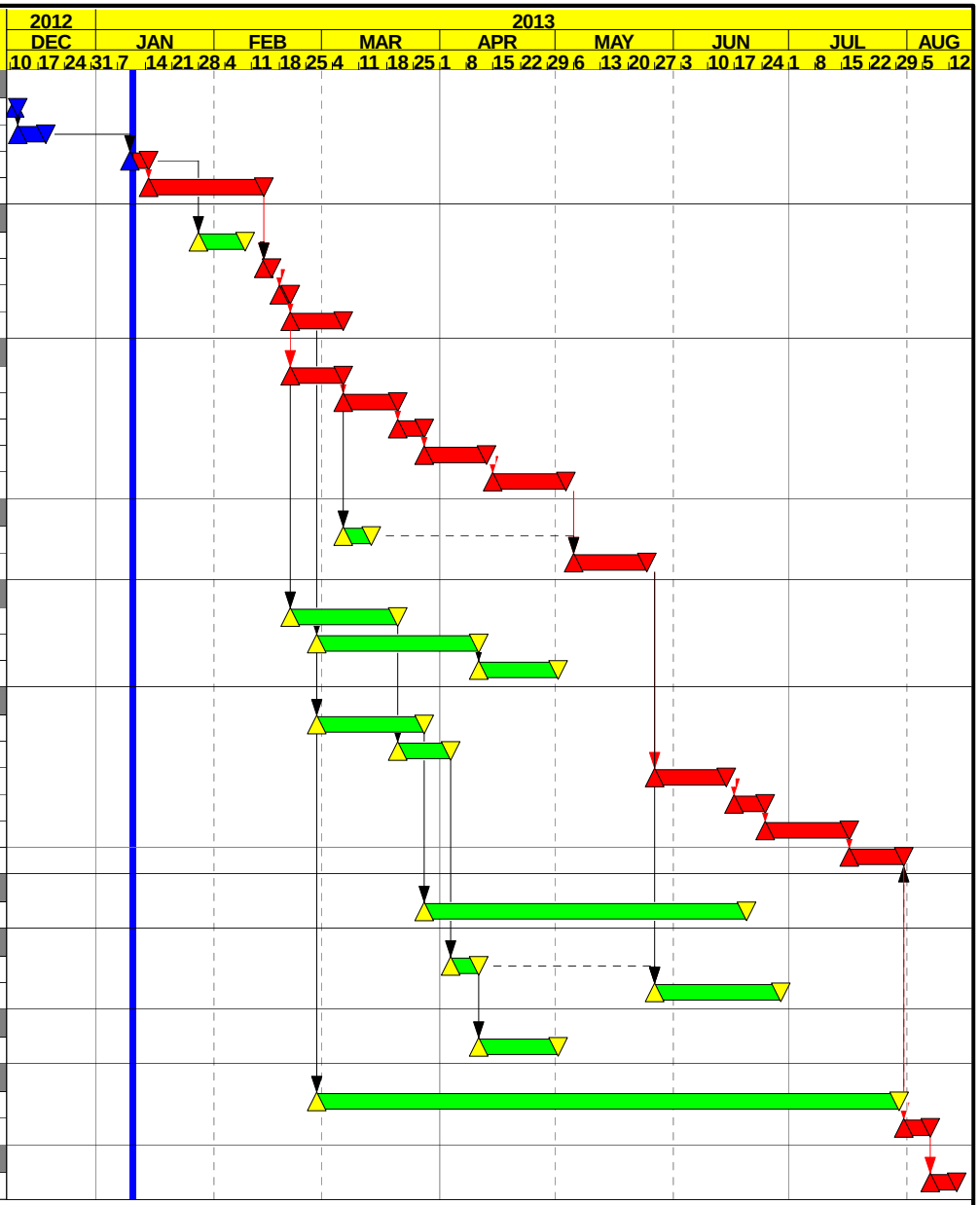
FIGURE 2
SITE LAYOUT

Riverbank Army Ammunition Plant
Riverbank, California

WESTON SOLUTIONS


Broadway Corridor
Western Corridor
Production Area
Gate 10
Stanislaus River
STANISLAUS COUNTY
RIVERBANK
Riverbank Army Ammunition Plant
0 0.05 0.1 Miles
N
LEGEND
Building/Structure
Galbestos Building
Non-Galbestos Building
Removed Equipment Decontamination Station
Rinsate Pre-Treatment System
Scale
Removed Equipment Staging Area
Equipment Removal Area
Equipment Removal Route
Site Feature
Fence
Railroad
0 50 100 200 Feet
City of Riverbank
Riverbank, California
FIGURE 3
EQUIPMENT REMOVAL ROUTES
Riverbank Army Ammunition Plant
Riverbank, California
WESTON SOLUTIONS

Activity ID	Activity Description	Orig Dur	Early Start	Early Finish
SAP				
1.1	SAP Submittal to Army	1	11DEC12A	11DEC12A
1.2	Army Review SAP	7	12DEC12A	18DEC12A
1.3	SAP Revision	3	10JAN13A	14JAN13
1.4	EPA Review/Approval	30	15JAN13	13FEB13
Mobilization				
2.0	Hiring/Training/Procurement	10	28JAN13	08FEB13
3.1	Field Office Setup	2	14FEB13	15FEB13
3.2	Decon Station Setup	3	18FEB13	20FEB13
3.3	Drain Oils from Equipment	10	21FEB13	06MAR13
Building 6				
4.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	10	21FEB13	06MAR13
4.2	Remove Small Plating Line	10	07MAR13	20MAR13
4.3	Remove Rectifiers	5	21MAR13	27MAR13
4.4	Remove Large Plating Line (B156)	12	28MAR13	12APR13
4.5	Remove Oven	15	15APR13	03MAY13
Building 50				
5.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	5	07MAR13	13MAR13
5.2	Remove Ovens	15	06MAY13	24MAY13
Building 13				
6.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	20	21FEB13	20MAR13
6.2	Remove Prodcution Line Equipment	30	28FEB13	10APR13
6.3	Remove Presses	15	11APR13	01MAY13
Building 1				
7.2	Remove Two Presses	20	28FEB13	27MAR13
7.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	10	21MAR13	03APR13
7.3	Remove Oven & Conveyors (West)	15	27MAY13	14JUN13
7.4	Remove Overhead Conveyors	6	17JUN13	24JUN13
7.5	Remove Oven (East)	15	25JUN13	16JUL13
7.6	Remove Overhead Conveyors (East)	10	17JUL13	30JUL13
Building 8				
8.1	Remove Presses	60	28MAR13	19JUN13
Building 171				
9.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	5	04APR13	10APR13
9.2	Remove Production Line	25	27MAY13	28JUN13
Other Buildings & Courtyards				
10.1	Vacuum Access Rte & Remv Chem & Non-fixed Equip	15	11APR13	01MAY13
Characterization Sampling & T&D				
11.1	Character. Sampling & T&D (Non-fixed Equip)	107	28FEB13	29JUL13
11.2	Charact. Sampling & T&D (Rinsate)	5	31JUL13	06AUG13
Temporary Facility Removal & Demobilization				
12.1	Temporary Facility Removal & Demob.	5	07AUG13	13AUG13



Start Date 11DEC12
Finish Date 13AUG13

Early Bar
Progress Bar
Critical Activity

RBEQ Sheet 1 of 1

Figure 4 - Riverbank Army Ammunition Plant
Phase 1, Equipment Removal
Project Schedule & Work Sequence

Date	Revision	Checked	Approved

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY

RESOLUTION

A RESOLUTION OF THE LOCAL REDEVELOPMENT AUTHORITY BOARD OF THE CITY OF RIVERBANK AUTHORIZE THE CITY MANAGER TO ENTER INTO A LEASE AMENDMENT WITH THE ARMY FOR EXTENDING OPERATIONS AND MAINTENANCE PAYMENTS FOR THE RIVERBANK ARMY AMMUNITION PLANT

WHEREAS, on May 16, 2005, the Secretary of Defense published in the Federal Register and transmitted to the Congressional Defense Committees and the Defense Base Closure and Realignment Commission a list of military installations that the Secretary of Defense recommends for closure or realignment; and,

WHEREAS, the Riverbank Army Ammunition Plant was placed on the list of military installations recommended for closure; and,

WHEREAS, the City Council is a duly elected body of the City of Riverbank, and as such, the designated authority with zoning authority over the closing base; and,

WHEREAS, and the Riverbank City Council, as the recognized and designated Local Redevelopment Authority for Riverbank Army Ammunition Base, has submitted a Reuse Plan for the redevelopment of the Riverbank Army Ammunition Plant as required under BRAC law and regulation; and,

WHEREAS, the Local Redevelopment Authority now wishes to oversee the fulfillment of the vision, goals and objectives as stated by the community and presented in the Reuse Plan; and,

WHEREAS, to do so, the Local Redevelopment Authority deemed it necessary to enter into a lease with the Army to allow the LRA to operate the Riverbank Army Ammunition Plant beginning April 1, 2010; and,

WHEREAS, according to the lease, the Local Redevelopment Authority agrees to perform certain duties associated with maintenance, operations and security on behalf of the Army; and,

WHEREAS, certain personal property located on the leased premises is contaminated with non-liquid polychlorinated biphyenyls; and,

WHEREAS, the Army has requested, and the Local Redevelopment Authority is proposing to perform the remediation and/or disposal of such personal property at Army expense; and,

WHEREAS, determined the most efficient way to handle additional responsibility associated with tasks is to amendment existing lease; and,

WHEREAS, the lease and amendment associated with proposed additional remediation and removal responsibilities has been reviewed by Local Redevelopment Authority counsel.

NOW, THEREFORE, BE IT RESOLVED that the Local Redevelopment Authority Board of the City of Riverbank hereby authorizes the City Manager to execute a lease amendment with the Army regarding the level of Operations and Maintenance of the Riverbank Army Ammunition Plant to the LRA for the remediation of specific surplus Army personal property.

PASSED AND ADOPTED by the Local Redevelopment Authority Board of the City of Riverbank at a meeting held on the 11th day of February, 2013; motioned by Authority Member _____, seconded by Authority Member _____, and upon roll call was carried by the following vote of ___:

AYES:
NAYS:
ABSENT:
ABSTAIN:

ATTEST:	**APPROVED:**
_____	_____
Annabelle Aguilar, CMC	**Richard O'Brien**
Secretary	**Chair**

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY
AGENDA ITEM NO. 6.3

SECTION 6: NEW BUSINESS

Meeting Date:	February 11, 2013
Subject:	**Resolution** Approving a Supplemental Contract Amendment to the Existing Riverbank Industrial Complex Facility Management Services Contract with San Joaquin Engineering Solutions
From:	Jill Anderson, City Manager
Submitted by:	Debbie Olson,Executive Director, Local Redevelopment Authority

RECOMMENDATION

It is recommended that the Local Redevelopment Authority ("LRA") Board of Directors review and approve the attached contract amending the existing facilities management agreement with San Joaquin Engineering Solutions ("SJES") to include additional tasks performed at the Riverbank Industrial Complex, formerly the Riverbank Army Ammunition Plant ("RAAP") in association with the Supplemental Lease Amendment #5 to that certain Army Lease No. DACA05-1-10-525 ("Lease").

Under this amendment, SJES will perform duties in support of the removal of surplus Army equipment not associated with their existing duties as outlined in the January 31, 2011, agreement with the LRA. A scope of work ("SOW") outlining additional, new duties is attached.

SUMMARY

The Army has asked the LRA to manage the remediation and removal of surplus Army personal property across the RAAP facility at Army expense. To that end, the LRA and the Army have worked to prepare a concise scope of work associated with the Army requested remediation and removal duties.

The LRA will receive an estimated $11,200,000 to perform the activities associated with this remediation and removal project. An amendment[1] to the existing operations and maintenance duties has been prepared for LRA Board approval and is the vehicle

[1] Supplemental Lease Amendment #5 to the existing Army Lease No. DACA05-1-10-525 on the February 11, 2013 agenda for approval by the LRA Board of Directors

necessary for the LRA to receive payment for performance of remediation and removal duties.

Subcontractors will be used for much of the performance of the work on this project, but the LRA has identified several duties that may be more efficiently, cost effectively and safely handled by the existing facility management group because of their experience, their existing certifications and an in-depth knowledge of the facility and the surplus equipment involved.

Duties identified under the developed SJES scope of work include, but are not limited to, removal of small, non-fixed items from the designated project areas to the processing and disposal area. These items include a cornucopia of objects. Examples of loose items include lockers, file cabinets, surplus lighting fixtures, plastic sheeting, wooden pallets, wire bins and baskets and other misc. loose objects cluttering the buildings. Additionally, they are being asked to drain and dispose of used motor oil from forklifts and other non-fixed equipment that should be cleared before moving. The oil recycling business on the facility will be handling the disposal of this oily waste.

BACKGROUND

The Army's active mission at RAAP ended in March 2010, when casing production ceased. On March 31, 2010, the RAAP facility was reclassified by the Department of Defense as closed.

On April 1, 2010, the LRA signed a Lease[2], with the Army, effectively assigning responsibility for much of the site over to the LRA. As part of this Lease, the Army also assigned a variety of operations and security duties associated with the ongoing care of the facility to the City of Riverbank LRA. These provisions are otherwise known as operations and maintenance responsibilities ("O&M").

Under the terms of the Lease, and as consideration to the LRA for O&M on the premises, the Army agreed to provide reimbursement for reasonable costs incurred for security, maintenance, repair, and other costs related to operating the RAAP.

Additional special tasks have been assigned to the LRA since the initial Lease was signed and additional payments or adjustments have been made to the LRA for providing those services. For example, during an extraordinary storm event, breaches in the storm water ponds required repairs. An additional payment from the Army for these maintenance operations was necessary to complete the scope of work because it fell outside the parameters of the existing duties and the existing lease does not allow for major repairs, improvement or other upgrades to the site.

In an effort to satisfy federal statutes regarding the conveyance of surplus property and comply with environmental regulatory guidelines, the Army must address contaminated

[2] Army Lease No. DACA05-1-10-525 executed on March 31, 2010

surplus personal property at the facility. Generally speaking, the Army must prepare a plan to deal with contamination on the property prior to conveyance, including contaminated surplus personal property. The remediation plan is reviewed and approved by the regulatory agencies with respective oversight.

In 2009, PCB-containing Galbestos paneling was discovered as siding and roofing on several of the main RAAP buildings. Subsequent testing by the U.S. Army Corps of Engineers found PCB contamination from exfoliated Galbestos particles present on stored equipment and other select surfaces throughout the buildings. Most of the contamination is present as dust particles, although testing also found that some PCB had penetrated building and equipment paint. Non-liquid PCBs are the primary contaminant being remediated, although hydraulic fluids from surplus equipment will also be disposed of during the remediation process.

The US Environmental Protection Agency has reviewed the proposed remediation and removal process and provided the Army and the LRA with a letter of approval to proceed with the activities.

The LRA and the Army are prepared to move forward with the remediation and removal actives associated with the surplus personal property upon LRA Board approval.

FINANCIAL IMPACT

No general funds will be necessary for the performance or payment of this contract amendment.

The LRA will receive an estimated $11,200,000 to perform services. SJES will receive payment as a subcontractor to the project for time, materials and project management costs, billed monthly as the project progresses. The contract amendment provides for payment of services at not-to-exceed amount of $**467,260.**

Failure of the Army to pay completely for the designated services voids the SJES supplemental contract amendment.

ATTACHMENT

1. Resolution
2. Scope of Work

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY

RESOLUTION

A RESOLUTION OF THE LOCAL REDEVELOPMENT AUTHORITY BOARD OF THE CITY OF RIVERBANK APPROVING A SUPPLEMENTAL CONTRACT AMENDMENT TO THE EXISTING RIVERBANK INDUSTRIAL COMPLEX FACILITY MANAGEMENT SERVICES CONTRACT WITH SAN JOAQUIN ENGINEERING SERVICES

WHEREAS, the Riverbank Local Redevelopment Authority (LRA) manages the former Riverbank Army Ammunition Plant for the Army; and,

WHEREAS, the Army pays the Riverbank LRA to manage the site; and,

WHEREAS, it is necessary to remove excess contaminated equipment from the site; and,

WHEREAS, the Army desires the Riverbank LRA to manage this removal and is processing an amendment to the Lease with the LRA to fund this effort.

NOW, THEREFORE, BE IT RESOLVED that the Local Redevelopment Authority Board of the City of Riverbank hereby approves an amendment to the contract with San Joaquin Engineering Services in an amount not to exceed $467,260 to handle a portion of the project.

PASSED AND ADOPTED by the Local Redevelopment Authority Board of the City of Riverbank at a meeting held on the 11th day of February, 2013; motioned by Authority Member _____, seconded by Authority Member _____, and upon roll call was carried by the following vote of ___:

AYES:
NAYS:
ABSENT:
ABSTAIN:

ATTEST:

_____
Annabelle Aguilar, CMC
Secretary

APPROVED:

_____
Richard D. O'Brien
Chair

San Joaquin Engineering Solutions
Lease Amendment #2

Scope of Work

1) <u>Moving Small, Non-Fixed Items from the Following Buildings to Processing Location</u>

Bldgs 1/45, Bldgs 4/48, Bldgs 5/49, Bldgs 6/50
Bld 8,9,15; Bldgs 13/171, Bldgs 20s, Bldgs 30s
Bld 51 Lab, Bldgs 80s, Bldgs 120, 156, all Courtyards

2) Removal and Disposal of Non-Fixed Drums & Miscellaneous Waste

3) Drain and Dispose of Engine Oils

4) Freon Capture and Disposal from Non-fixed Equipment

TOTAL (Not to exceed) $467,260