Update of the

U.S. Army BRAC 2005

Environmental Condition of Property

Phase I Report

Economic Development Conveyance Parcels,

Riverbank Army Ammunition Plant

Riverbank, California

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Riverbank Army Ammunition Plant
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March 2017

EXHIBIT E

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Acronyms

µg/L	micrograms per liter
AGCS	Ahtna Government Services Corporation
AOC	Area of Concern
AR	Army Regulation
ASTM	American Society for Testing and Materials
bgs	below ground surface
CACA	Corrective Action Consent Agreement
CFR	Code of Federal Regulations
DoD	Department of Defense
DTSC	Department of Toxic Substance Control
ECP	Environmental Condition of the Property
EDC	Economic Development Conveyance
EDR	Environmental Data Resources
E/P	evaporation/percolation
EPA	US Environmental Protection Agency
ESCA	Environmental Services Cooperative Agreement
ESD	Explanation of Significant Difference
FOSET	Finding of Suitability for Early Transfer
FOST	Finding of Suitability for Transfer
GWTP	Groundwater Treatment Plant
GWTS	Groundwater Treatment System
HWFP	Hazardous Waste Facility Permit
HWMU	Hazardous Waste Management Unit
IWTP	Industrial Waste Water Treatment Plant
LTM	Long Term Maintenance
MCL	Maximum Contaminant Limit
NFA	No Further Action
PCB	polychlorinated biphenyl
RBAAP	Riverbank Army Ammunition Plant
RCRA	Resource Conservation and Recovery Act
RLRA	Riverbank Local Redevelopment Authority
ROD	Record of Decision
TSCA	Toxic Substance Control Act
USACE	US Army Corp of Engineers
UST	underground storage tank

1.0 INTRODUCTION

An Environmental Condition of Property (ECP) Update has been performed for the RBAAP (the "Property") in accordance with Army Regulation (AR) 200-1 and applicable American Society for Testing and Materials (ASTM) standards. Under ASTM D 6008-96 (reapproved 2014), the following components were completed: site reconnaissance, records review, and the certification by the environmental professional responsible for the assessment.

The RBAAP is located at 5300 Claus Road, Riverbank, Stanislaus County, California, one mile south of the Stanislaus-San Joaquin County border and approximately five miles northeast of the city of Modesto. The RBAAP occupies a total of 168 acres of land and consists of two noncontiguous areas represented by the main plant area (approximately 139.2 acres) and the evaporation/percolation (E/P) ponds (28.8 acres). The property is broken into 7 parcels. The parcels are: A, B, 1, 1a, 2, 2a and 4 (E/P ponds). A description of each parcel is below. Parcels A and B will be transferred to the City of Riverbank Local Redevelopment Authority (RLRA) under an Economic Development Conveyance (EDC). Parcels 1, 1a, 2, 2a and 4 (E/P ponds) will be sold, and are referred to as the sale properties. A parcel map of the site has been prepared and is presented as Figure 1.

- Parcel A occupies 77.678 acres and includes most of the industrial buildings and facilities at RBAAP. The Northwest Storm Water Reservoir Site covers 3.25 acres and temporarily stores storm water from the industrial areas after rain events. Parcel A and the Northwest Storm Water Reservoir Site are collectively the Economic Development Conveyance (EDC) transfer parcels and will be transferred to the City of Riverbank Local Redevelopment Authority (RLRA) under an EDC (Figure 1). A Finding of Suitability for Early Transfer (FOSET) is being prepared for the EDC parcels. Updates to this parcel include: closure of the Resource Conversation and Recovery Act (RCRA) permit and associated Hazardous Waste Management Units (HWMU); Site characterization per the Environmental Services Cooperative Agreement (ESCA); development of ESCA 2; groundwater monitoring reporting; groundwater monitoring well program changes. All updates are described in sections below.
- Parcel B is roughly 24.4 acres in size and is at the north end of the former RBAAP property. Parcel B is crossed by the railroad tracks that service the industrial area at RBAAP. Aside from the railroad tracks Parcel B is undeveloped and uncontaminated. The reuse of Parcel B will be unencumbered. Parcel B will be transferred to the RLRA under an EDC. A Finding of Suitability for Transfer (FOST) has been prepared for Parcel B. Parcel B is north and east of and adjacent to the Northwest Storm Water Reservoir and Parcel 2 (Figure 1). There are no changes to the environmental conditions on this parcel, however, there have been additional sampling events that confirmed the land is not contaminated.
- Parcel 1 is 8.46 acres and Parcel 1a is 4.37 acres. The parcels were used for employee parking during the history of the facility. Parcels 1 and 1a are was investigated for the presence of liquid polychlorinated biphenyls (PCBs) in surface soils in 2013. The investigation confirmed the thought that oil containing PCBs were used for dust suppression in these parking areas (US Army Corps of

Engineers [USACE] 2014c). Following this investigation, a cleanup of PCB impacted soils on Parcels 1 and 1a started in June 2015. Parcels 1 and 1a are south of and adjacent to Parcel A. A FOST document shall be prepared for Parcels 1 and 1a following soil remediation.

- Parcel 2 is 19.56 acres and Parcel 2a is 3.25 acres. These parcels are located north of the main plant. Parcel 2 is mostly open space. Parcel 2a has been used for storage of Mobile homes and Recreational Vehicles. Parcels 2 and 2a are north of and adjacent to Parcel A. Parcel 2 and 2a are between the industrial area and northwest storm water reservoir site. A FOST has been prepared for Parcels 2 and 2a. There are no changes to the environmental conditions on this parcel, however, there have been additional sampling events that confirmed the land is not contaminated.
- Parcel 4 - Evaporation/Percolation (E/P) ponds - were used for disposal of treated industrial wastewater from the plant and currently receives the discharge from the Ground Water Treatment Plant (GWTP). The ponds are located north of the plant on the Stanislaus River. Treated wastewater was piped from the facility to the E/P Ponds. The sale of the E/P Ponds parcel shall be contingent upon the Army being allowed to dispose of GWTP effluent to the E/P Ponds for as long as the groundwater treatment system is required to operate. A FOST has been prepared for the E/P Ponds parcel. There have been no changes to this parcel since the completion of the 2013 ECP Update related to this parcel.

The former RBAAP Property was leased to the RLRA for industrial/commercial reuse. That lease is being re-negotiated. Upon termination of the lease or portions thereof, Parcels 1, 1a, 2, 2a, and the E/P ponds will be sold by public sale. (Figure 1).

2.0 BACKGROUND

The U*.S. Army BRAC 2005 Environmental Condition of Property Report, Riverbank Army Ammunition Plant, Riverbank, CA* was released in November 2006. The purpose of the ECP Report was to characterize the existing environmental conditions at RBAAP. This ECP Report meets the requirements of Title 40, Code of Federal Regulations (CFR), Part 373, § 373.1; AR 200-1; and closely parallels ASTM 6008-96 (2005). The original ECP Report was reviewed and found to meet the requirements set forth in 4.6.2 of ASTM D 6008-96 and the narrative discussion and findings of that report are incorporated by reference into this report as if contained here in its entirety.

The ECP Report classified the study sections of the property into one of seven ECP categories. A total of 45.7 acres were classified as Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas). The U.S. Environmental Protection Agency (EPA) Region IX concurred with the uncontaminated property designations on 4 May 2007.

Since that time, further review and assessment of the property has been conducted. A total of 5.568 acres were originally identified as Category 7 (areas that had not been evaluated or required additional investigation) in the ECP Report. These areas (if accessible due to ongoing operations) were investigated in the *Site Investigation Report,*

Riverbank Army Ammunition Plant, Riverbank, California, in March 2008 and through the RCRA permit closure process. Based on the results of the Site Investigation, the ECP categories were updated for several study sections. EPA Region IX concurred with the results of this investigation in a letter dated 14 December 2007. Subsequently, PCBs and asbestos were detected in the Galbestos panels on the exterior of several buildings. Also, due to other PCB investigations, Parcel 1 and 1A are now ECP Category 5. Also due to new MCLs and on-going groundwater contamination activities, many previously identified ECP Category 3 areas are now Category 5s.

The current ECP categories for the parcels are shown in Table 1 and are presented in Figure 2.

3.0 SITE RECONNAISSANCE

The USACE staff, on behalf of the Army, frequents the property. Additionally, through its lease, the LRA occupies the Property and acts as a caretaker. No known releases of hazardous substances or petroleum, with the exception of the exfoliation of the Galbestos panels and discovery that liquid PCBs were used for dust suppression on Parcels 1 and 1a, have occurred on the property since the ECP Report and Site Investigation Report were prepared.

4.0 INTERVIEWS

James McAllister, USACE

William Millar, Calibre, BRAC Headquarters

5.0 RECORDS REVIEW

A review of environmental documentation was conducted to support the preparation of transfer documents for the RBAAP. All known records and information associated with the environmental condition of the subject property have been documented in the original ECP Report and the Site Investigation Report, with the exception of subsequent investigations of groundwater contamination, changes to the groundwater remedial approach, and PCB contamination in Parcels 1 and 1a, and updated Galbestos information. Information on hydrostratigraphy and the potable water system at the facility have also been updated.

Groundwater Reports: Groundwater sampling occurs during four events per year - two quarterly, one semi-annual, and one annual. The latest sampling results are provided in the *RBAAP 2Q 2016 Groundwater Monitoring & Landfill Post-Closure Report*, by Ahtna Engineering.

Investigations: During the course of environmental investigation and remediation at the site several Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) have received No Further Action (NFA) determinations from the California Department of Toxic Substance Control (DTSC) and/or the US Environmental Protection Agency (EPA) Region 9. A summary of the documentation of the No Further Actions (NFAs) is presented in Appendix A to this update. Three early versions of the Resource RCRA Facility Investigation Work Plan were discussed as sources of NFA documentation in the original ECP but could not be located for confirmation. Citations to these documents

found are in Appendix A along with tables and lists cross referencing the sites and documents; the complete reports can be found in the Administrative Record.

NFA Designations: The sites designated for NFA have been organized into several types:

- There are NFA sites that were designated as such in the 1994 Record Of Decision (ROD) that are closed;
- There are sites that were closed under the RCRA Permit and any subsurface contamination was addressed and remediated;
- Sites that need to be closed under a new NFA ROD – these sites were investigated and remediated but need to be closed out under CERCLA;
- Sites that need to be closed out under a PA/SI – these sites have had preliminary assessments and some site investigations that resulted in a no action determination but that need proper PA/SI documentation under CERLCA; and
- Sites that do not require any additional action: these are sites that were closed out under the UST program and propane or water storage tanks.

There are sites that may fall under more than one type. A table has been prepared that is included in Appendix A that presents the sites by type.

Sites that Need Additional Work:

- Sites that require additional characterization and potentially remediation before they can be closed out under CERLCA – work on these sites will be conducted under an ESCA.

RCRA Permit: The RCRA permit (05-SAC-06) was originally issued in 1997, renewed in 2006 and then consequently closed in August 2016. The permit required RBAAP to conduct a RCRA facility investigation, and in 2002 a CACA identified 25 SWMUs and 16 AOCs. Of those identified, 6 sites required additional investigation, and all others were given no further action status. Due to this agreement, in 2003, additional investigations took place. The investigations lead to no further action status from the DTSC for all areas, with the exception of the IWTP (SWMU 1). The IWTP consists of the 13 Hazardous Waste Management Units listed below. The RCRA permit for the industrial operations at RBAAP was closed in August 2016. In 2013, Closure Certification Reports for the following HMWU were submitted to DTSC:

- HMWU #1 Industrial Waste Treatment Plant
- HMWU #2 Coolant Recovery Unit
- HMWU #3 Chromium Reduction Unit – Batch Process
- HMWU #4 Chromium Reduction Unit – Continuous Process
- HMWU #5 Equipment Wash Facility,
- HMWU #6 Spent Machine Oil Recycling Unit
- HMWU #7 Spent Solvent Recycling Unit,
- HMWU #8 Drum Storage Facility,

- HMWU #9 Used Oil Tank,
- HMWU #10 Hazardous Waste Accumulation Area,
- HMWU #11 Paint Sludge Dewatering Facility,
- HMWU #12 Reactor Clarifier, and
- HMWU #13 Groundwater Treatment Plant.

Other investigations and reports considered during this ECP Update:

- Site investigation Report, CH2M Hill, March 2008
- Draft Final Galbestos Investigation Report, December 2010
- Final EDC Property & Sale Parcels 2 & 2A Soil Investigation Report, December 2014 (USACE, 2014)
- Final Southern Parcels 1& 1A and OID Drainage Ditch, Soil Data Gap Investigation Report, May 2015

Environmental Data Resources, Inc (EDR) Report: The records search for RBAAP, conducted by EDR, in June 2006, searched for any potential environmental sites of concern located off Army property within corresponding ASTM search radius distances. The EDR report identified five sites located within 1 mile of the main post and the E/P ponds. These sites were characterized as having a low potential to impact the property. The information presented in this report on adjacent properties remains accurate.

A new record search report was conducted by EDR in January 2014 (Appendix B). The results of this report are consistent with the 2006 data base search.

6.0 UPDATED ENVIRONMENTAL CONDITIONS

6.1 Sale Parcels:

The following section updates the Sale Parcels: Parcel 1, 1A, 2, 2A and the E/P Ponds.

6.1.1 - Parcel 1 and 1A:

The USACE investigated the presence of liquid PCBs in surface soils at parcels 1 and 1a at RBAAP in 2013 (report finalized in 2015). During this effort, soil samples were collected in 3 intervals: 0-6" below ground surface (BGS), 12"-18" BGS and 24"-30" BGS. Samples were collected from the soil covering the parcel, the adjacent irrigation drainage ditch and the drainage ditch excavated sediment piles, and in the bottom of the irrigation drainage ditch. The majority of the results were above the RSLs, which confirmed the presence of PCB contamination above Regional Screening Levels (RSLs). Remediation efforts began in June 2015 and are on-going with the estimated completion date of June 2017. The soils are being remediated to less than 0.99 mg/Kg. These areas are no longer Category 1, but are now ECP Category 5. This is a CERCLA action.

6.1.2 - Parcel 2 and 2A:

The most recent ECP update related to this parcel was finalized in May 2013. Since the completion of the 2013 ECP update, the report that addressed PCB, VOC and metal samples was finalized. During this sampling effort, surface (0-6' BGS) and subsurface (12"-18" BGS) soil samples were collected in May 2012. The soil samples were analyzed for PCBs, VOCs and metals. All PCB and VOC results were below industrial RSLs. Arsenic exceeded the calculated background level in one sample on the southwestern side of parcel 2A. This arsenic exceedance can be attributed to the past intended application of arsenical pesticide. There are several groundwater monitoring wells on this parcel. In June 2016, USACE submitted a proposal to update the groundwater monitoring plan related to IRP Site RBAAP-03 in Parcel A. This plan proposes to abandon all wells on parcels 2 and 2A. The wells are: EW47C, MW45A', MW45B, MW45C, MW47B, MW47C, MW66A, MW66B and MW66C.

6.1.3 - Parcel 4 (E/P Ponds):

The E/P Ponds occupy 28.8 acres on the banks of the Stanislaus River approximately 1.5 miles north of the main installation. The E/P Ponds were constructed in 1952 for the disposal of treated effluent generated at the RBAAP. Based on the RI findings, a removal action was completed in 1993 to address zinc-contaminated soil. The ROD documented this removal action and concluded that no further action was necessary at the ponds (USAEC, 1994).

The EP Ponds were sampled for PCBs as a part of the Galbestos investigation at RBAAP. None of the sediment samples in the E/P ponds contained PCBs exceeding the Toxic Substance Control Act (TSCA) criteria. Stained soil was observed along a retaining wall on the east side of the Evaporation Ponds. Soil samples were collected and analyzed or volatile organic compounds (VOCs) and petroleum hydrocarbons. VOCs were not detected in the samples collected. Petroleum hydrocarbons were not detected above applicable screening levels. Additional characterization work was not warranted (USACE document *Evaporation/Percolation Pond Soil Sampling Report, October 2011).*

RBAAP continues to use the E/P Ponds for discharge of treated water. This discharge is regulated under Waste Discharge Requirements (WDRs) issued by the Central Valley Water Board. The WDRs require ongoing groundwater monitoring at the E/P Ponds. This area remains an ECP Category 4.

6.2 EDC Parcels: This section updates EDC parcels B and A. These parcels will be transferred to the LRA.

See table 1 for a list of all ECP study sections and ECP Category.

6.2.1 - Parcel B:

There are no updates since the completion of the ECP update dated January 27 2014. This area remains ECP Category 1.

There is one monitoring well located on this parcel (MW60A), related to the groundwater contamination on Parcel A (IRP site RBAAP-03). This well is active, but has been dry since prior to 2014. This monitoring well will remain in the Groundwater Monitoring Program (GMP). Historical groundwater data indicates that the groundwater is not contaminated in this parcel. Since the completion of the 2014 ECP update, the report that addresses PCB, VOC and metal samples was finalized (December 2014). During this effort surface (0-6' BGS) and subsurface (12"-18" BGS) soil samples were collected in May 2012. The soil samples were analyzed for PCBs, VOCs and metals. All PCB and VOC results were below industrial RSLs, and all metals were below the calculated background level (USACE, 2014).

6.2.2 - Parcel A:

See below for the updates related to the groundwater remediation effort (IRP Site RBAAP-03); IWTP and RCRA Permit Closure (SWMU 1); and newly identified PCB remediation sites.

6.2.2.1 Updates to previously identified sites:

Updates to RBAAP-001-R-01, Former Pistol Range (ECP Study Section 12):

This area was reported used for small arms target practice in the 1950s. During the 2008 site investigation, the former pistol range was investigated for the presence or absence of small arms munitions and lead contamination in the soil at and around the site. During this effort, a metal detector survey was completed, and soil samples were collected and analyzed for lead. The metal detector survey was negative for MEC, and the soil samples indicate that the levels of lead in the ground are below screening levels No further action required. (USACE, 2008).

Updates to IRP Site RBAAP-03: Groundwater Remediation (ECP Study section 3:

The IRP Site RBAAP-03 contains chromium and cyanide groundwater contamination resulting from leakage associated with the original IWTP. The original IWTP at RBAAP was constructed to treat the wastewaters generated from the electroplating, cleaning, and metal finishing processes that were operated on-site. From 1973 to 1980, the IWTP was upgraded. The upgraded IWTP, identified as SWMU 1, was operated under a RCRA Part B Permit 05-SAC-06, and has since been closed.

In 1985, groundwater samples from six wells located west of the RBAAP showed levels of chromium in excess of the MCL of 50 micrograms per liter (µg/L). As a result, the Army installed an interim groundwater treatment system (GWTS) and provided bottled drinking water to those affected residents followed by the extension of the Riverbank city water system to all potentially affected residents. The original IWTP redwood tank area was identified as the major source of chromium contamination. The EPA added the

RBAAP to the NPL on Feb. 21, 1990, primarily due to the presence of groundwater contamination (cyanide and chromium) detected on and off-post. Recent investigations results from the IWTP have created some doubt about the redwood tanks being the major source of the chromium contamination.

The groundwater contamination was addressed in the site-wide ROD (USAEC, 1994). In accordance with the ROD, the Army began operating the existing groundwater treatment system (GWTS) in 1996 to treat groundwater contaminated with chromium and cyanide. Groundwater contamination plumes are defined as areas of groundwater that exceed the Maximum Contaminant Level (MCL) identified in the ROD for either chromium (50 µg/L) or cyanide (200 µg/L). The treated groundwater is discharged to the E/P Ponds under discharge permit 5B50NC00012. Analytical data from groundwater samples collected since initiation of the remedial action show that, overall, the GWTS has been effective at capturing the groundwater contamination plumes and treating groundwater to below the MCLs. However, the results of the studies indicate the GWTS system was not effective at reducing chromium concentrations to below the MCL in certain small, localized areas. To reach the cleanup goal of 50 µg/L for chromium, a modified remedial approach using In situ treatment technologies was adopted (USACE 2011a).

A Conceptual Site Model (CSM) for groundwater at the RBAAP site has been developed from 30 years of investigative and remediation data. According to the ROD, the two primary sources of groundwater contamination on-site are the landfill at the northeast end of RBAAP and potentially the IWTP area in the east-central area of RBAAP. A secondary cyanide source area may lie between these two areas as well. Due to recent investigations and data analysis, the large, main production facility at the southern end of RBAAP was found to also be a potential chromium source area (USACE 2014b). Each of these source areas has had remedial actions or remedial actions are in progress, but may still provide a threat to continued groundwater degradation.

Clean-up Standard Update:

A new State MCL for hexavalent chromium of 10 µg/L was established on July 1, 2014. The Army will work with the regulators to assure that the groundwater remedy at RBAAP will be able to reduce hexavalent chromium concentrations to comply with this new MCL.

In-Situ Treatment information and Update:

In September 2007, the Army initiated, with regulatory approval, a one-year shutdown of the groundwater pump and treatment system to study rebound effects. It also conducted an in situ pilot test of ferrous iron and carbon to determine if this could result in an alternative treatment of residual hexavalent chromium in the groundwater. The localized contamination and plume stability indicated by the results of the Rebound Study support localized in situ treatment for the remaining areas of chromium contamination. The results of the in situ pilot test demonstrated that reductant injections rapidly reduced dissolved chromium concentrations by precipitating chromium (AGSC, 2009a, 2009b).

The IWTP was decommissioned in 2013 and remaining HWMUs were closed under the RCRA Hazardous Waste Facility Permit (HWFP). Starting in 2014 in-situ groundwater treatment cells were installed to address chromium-contaminated groundwater flowing westward from beneath the main production facility and the sanitary landfill. Zinc chromium solutions were historically used for plating of metals related to operations at the ammunition plant at RBAAP, and recent investigative results indicate leaks from product and/or waste pipelines within the facility are likely source(s) of the persistent chromium-impacted groundwater observed to the west (down gradient) of the plant at levels exceeding the MCL (USACE, April 2014b).

In 2014, a Geochemical Fixation In Situ Treatment Work Plan was approved by regulators. The Phase I of the plan was completed from September 2014 through October 2015. The Phase I effort included the use of 27 injection wells in the Building 13 area in the A', B and C-zones, and three wells downgradient of the Landfill in the A'-Zone. Once a groundwater quality baseline was established, the wells were injected with 10,000-gallons of high fructose corn syrup (HFSC) in September 2014, and then injected with 10,000-gallons of ferrous iron sulfate and HFSC mixture in October 2014. The post-injection data showed that the dissolved and hexavalent chromium concentrations were either non-detect or significantly lower than the original MCL.

In December 2016, an addendum to the In Situ Treatment Work Plan was submitted to regulators for comment for eventual approval to address the potential source of chromium contamination near the main production facilities on the southern end of the parcel. This addendum proposes an update to the original plan by the installation of 12 new injection and groundwater monitoring wells, treatment procedures and materials. The locations are to the west of the main production facility. The wells will be injected with the HFSC for the first round of injection, and a HFSC and ferrous sulfate mixture for the second round, one month after the first. Post injection sampling of the injection and on-site monitoring wells will begin at two weeks after the second injection. This plan was approved in January 2017 (Ahtna 2016 – GMP Update and DTSC 2017 Email).

Updated Groundwater monitoring results:

Groundwater monitoring consists of four sampling events per year; two quarterly, one semiannual and one annual which include specific sets of wells completed in the various A, A', B, C and D portions of the aquifer (USACE 2014a). The locations of the monitoring wells are shown in Figure 3. The results of the groundwater sampling from the First quarter of 2016 are shown on Figures 4, 5, 6, 7, and 8 (Ahtna Government Services Corporation [AGSC], 2016).

Based on the most recent quarterly groundwater report, there are eight wells (out of 36 sampled) that have hexavalent chromium above the new MCL (10 ug/L). Some of these wells are located in areas that were previously Category 3, and have now been changed to Category 5 based on the fact that the groundwater contamination is above the MCL. Overall, the groundwater contamination continues to decrease over time. (AGSC, 2016).

Groundwater Monitoring and Plans Information and Update:

In 2016, Ahtna submitted an updated groundwater monitoring work plan proposes to remove six (6) annual sampling wells from the monitoring program, and add eight (8) annual sampling wells and seven (7) semiannual sampling wells to the program. In addition, the sampling frequency of ten (10) wells is proposed to be reduced from quarterly to annual. Also, this plan proposes to abandon 48 monitoring wells. This work plan approved by the DTSC on January 17, 2014 (Ahtna 2016 – GMP Update and DTSC 2017 Email).

Updates to SMWU 1 IWTP (ECP Study Section 13):

The RCRA permit (05-SAC-06) was originally issued in 1997, renewed in 2006 and then consequently closed in August 2016. The permit required RBAAP to conduct a RCRA facility investigation (RFI). The RFI resulted in a CACA that identified 25 SWMUs and 16 AOCs. Of those identified, six (6) sites required additional investigation, and all others were given no further action status. Due to this agreement, in 2003, additional investigations took place. The investigations lead to no further action status from the DTSC for all areas, with the exception of the IWTP (SWMU 1). The IWTP consists of 13 HWMUs. In 2012, the RCRA Hazardous Waste Facility Permit Closure Work Plan was approved (Athna Work Plan, 2012). The final work plan details all specific closure actions and criteria required to close the RCRA permit and associated HMWUs. The closure actions took place during 2012 through 2016. Each HMWU had specific above ground (rinsate from decontamination) and below ground closure (soil samples) criteria. The soil samples collected for each HMWU was analyzed for metals, VOCs and pH at various depths. If decontamination was part of the closure processes, the rinsate was sampled for metals, VOCs, SVOCs and TPH-DRO. During the closure process, total chromium levels above the background criteria were typically seen below 40 ft bgs, and are not necessarily indicative of a release at the specific HWMUs because the chromium was likely associated with groundwater that had previously occupied this zone and then remained in the soil after the zone was dewatered. In 2016, Closure Certification Reports for the following HMWU were submitted to DTSC. The certification reports describe all actions, samples and results of each of the HMWU. Most of the rinsate samples from the decontaminated tanks and surfaces were above the closure criteria, and were therefore demolished in 2015/2016. The area was capped after all aboveground structures were demolished.

In August 2016, the DTSC determined that all HMWUs met the closure criteria as detailed in the approved work plan, and consequently closed the RCRA permit (DTSC 2016). Due to this change in status, some ECP study areas changed from the original ECP category 7 to ECP category 5. Category 5 is based on the groundwater contamination.

Updates to Building 11, Paint and Oil Storage (ECP Study Section 1011): There were reports that this building used to have a radioactive storage sign. There are no records of NRC-licensed materials used on RBAAP. Due to the possibility, the 2008 Site Investigation performed a radiation survey by collecting 31 direct measurements and smear samples for various radiation types. All survey results were below NRC established contamination levels. Also during this site investigation, soil samples were analyzed for PCBs around the building. One soil samples was above detection at 38

ug/kg (USACE 2008). As part of the ESCA, this area will undergo further PCB and TPH analysis the extent of, if any, contamination.

Updates to Structure 95, Substation No. 1 (ECP Study Section 1095): The 2008 Site Investigation collected a composite soil sample and analyzed it for PCBs. The results of this sample was above residential but less than industrial PRGs. As part of the ESCA, this area will undergo further PCB analysis to determine the extent of, if any, PCB contamination. This area is now considered an ECP Category 6.

Updates to Structure 97, Substation No. 3 (ECP Study Section 1097): The 2008 Site Investigation analyzed two composite soil samples at different depths. The result of this analysis was above residential but less than industrial PRGs. As part of the ESCA, this area will undergo further PCB analysis to determine the extent of PCB contamination. This area is now considered an ECP Category 6.

Updates to Structure 101, Substation spare (ECP Study Section 1101): The 2008 Site Investigation analyzed two composite soil samples at different depths (surface and 0.5 – 1 foot BGS) for PCBs. The result of the surface sample was 1,900 ug/kg, which exceeded both the industrial and residential PRGs. The deeper sample result was 33 ug/Kg, lower than both industrial and residential PRGs. As part of the ESCA, this area will undergo further PCB analysis to determine the extent of PCB contamination. This area is now considered an ECP Category 6.

Updates to Structure 145, Substation 17 (ECP Study Section 1145): The 2008 Site Investigation analyzed one composite soil sample from three locations, two surface soil samples (0.5 to 1 foot BGS), and one shallow sub-surface (0.5 to 1 foot BGS) for PCBs. The results indicated that PCBs were in the soil above residential and industrial PRG in two of the samples, but are below TSCA requirements. As part of the ESCA, this area will undergo further PCB analysis to determine the extent of PCB contamination. This area is now considered an ECP Category 6.

Updates to Building 162, Autodin A.B. Terminal Building (ECP Study Section 1162): Due to potential storage radioactive material storage in this building the 2008 site investigation conducted a radiological survey. The survey sampled for radiation in 30 random locations throughout the building. The survey results were well below screening levels. No further action required (USACE 2008).

Updates to Building 174, Hazardous Waste Storage Area (ECP Study Section 1174): The 2008 Site Investigation conducted a radiological survey to document the absence of radiation throughout the building. During this effort 31 random location were sampled for alpha, beta and gamma radiation. All results were below screening levels. No further action required (USACE, 2008).

6.2.2.2 - Newly Identified PCB and ACM Remediation Activities:

PCBs have been detected in Galbestos panels on Buildings 1-8, 11, 12, 15, 33, 43, 45-50, 80, 81, 133 and 160 and attached structures. Galbestos is a galvanized sheet metal siding with a layer of asbestos felt on one side which has been dipped in an asphaltic coating containing PCBs. Over the years, the Galbestos siding has weathered, allowing a non-

liquid form of PCBs to be released. Sampling results have detected a release of PCBs from the Galbestos panels above TSCA criteria as well as EPA Regional Screening Levels in several locations within and adjacent to buildings in the main plant area as well as the Northwest and Southeast Storm Water Reservoirs (USACE 2013b). Studies to locate the areas with Galbestos Panels (Weston 2010 and USACE 2011b), and investigate the asbestos and PCB present in air and dust at the facility (USACE 2010) have been completed. An ESCA (ESCA 1) has been completed to remove PCB and asbestos containing dust from equipment at Riverbank. The Army and the RLRA will conduct a second ESCA (ESCA 2) to remove and dispose of the Galbestos Panels from the buildings at the facility and investigate and clean up any contamination inside the buildings, and investigate and remediate any soil contamination resulting from the deterioration of the Galbestos outside the buildings (USACE 2013b).

As part of preparation for the ESCA, sampling of soil in the industrial area at the east side of the plant near the railroad tracks took place and areas of soil contamination with liquid PCBs have been discovered that may be the result of dust suppression using spent oil containing PCBs during plant operations. This soil contamination will be characterized and remediated as part of the ESCA 2.

6.2.2.3 - PCB Equipment Update:

The listing of electrical transformers with PCBs has been updated since 2005. The updated information is provided in Table 4. This equipment is operational, properly labeled in accordance with federal and state regulations, and has been determined not to be leaking.

6.2.2.4 - Other future analysis:

Also as part of the ESCA, the soil around the following buildings will be sampled and analyzed for various constituents. The building and the constituent is listed below.

- Tool Crib/Warehouse/ Offices, Building 10 (ECP study section 1010) – TPH
- Boiler House, Building 12 (ECP study section 1012) – TPH and Metals.
- Paint Spraying Facility, Building 169 (ECP study section 1169) - VOCs

6.3 Hydrostratigraphy

The hydrostratigraphy of the RBAAP site has been defined through several remedial investigation phases and subsequent remedial design phases. The presence of discontinuous fine-grained sediment layers creates a complex groundwater flow pattern in the vicinity of the RBAAP. Five zones of relatively coarse-grained sediments, separated by inter-beds of finer grained material, have been identified at RBAAP (Weston, 1991) and confirmed with recent in situ well installations (Ahtna, 2015a). These stratigraphic zones vary in continuity, thickness, and depth at RBAAP and are hydraulically interconnected

- **Zone A** – sand and silty sand; ~10 feet thick, extends from ~30 to 40 feet bgs;

- **Interzone A/A'** – clay and silt; ~25 feet thick, extends from ~40 to 65 feet bgs;
- **Zone A'** – sand and silty sand with clay lenses; ~20 feet thick, extends from ~60 to 85 feet bgs;
- **Interzone A'/B** – clayey silt and and clayey sand interbedded with the A'-Zone, ; ~10 feet thick, extends from ~80 to 90 feet bgs;
- **Zone B** – Well graded and poorly graded sand; ~20 feet thick, extends from ~90 to 110 feet bgs;
- **Interzone B/C** – Clay/silty clay with isolated areas of sandy silt;; ~10 feet thick, extends from ~110 to 110 feet bgs;
- **Zone C** – sand and silty sand with isolated areas of silt and clay; ~25 feet thick, extends from ~120 to 145 feet bgs;
- **Interzone C/D** – silt and clay; ~50 feet thick, extends from ~145 to 195 feet bgs; and
- **Zone D** – gravel and clayey gravel; >45 feet thick, top of unit ~195 feet bgs.

(Ahtna Engineering 2016).

6.4 Potable Water System

There were a total of 6 water supply wells on the EDC parcel. The remaining drinking water well information is presented in Table 2.

The Army has abandoned wells 02, 03 and 04. Wells 05 and 06 are now the primary water supply wells on the site. Well 01 is held in reserve.

The dates of the installation of the wells at RBAAP could not be determined; it is thought the wells were built in 1942. A drawing was found showing the well locations, boring logs and construction logs. The drawing was dated June 1969 and a copy of the drawing and other logs of the wells are provided in Figure 9. A better figure with well locations is presented in Figure 10. Better images of the lithologic logs and well construction logs are also presented in Figures 11-13.

The boring and well construction logs were reviewed to determine which stratigraphic zones the wells are screened in. The first perforated casing in well 5 is roughly 110 feet BGS. There are roughly 20 perforated intervals in the well from 110 feet BGS to approximately 680 feet BGS. The first perforated casing in well 6 is roughly 120 feet BGS. There are roughly 7 perforated intervals starting at 120 feet and extending to 600 feet BGS. Well 1 is 430 feet deep with a perforated casing interval from 150 to 170 feet BGS and no casing from 228 feet to 430 feet. These wells are perforated in Zone C, Interzone C/D, Zone D and deeper. Most of the perforated casing in all of the wells and the pump in each of the wells are in Zone D or deeper.

The drawing indicates that the wells are perforated in the aquifer zones where hexavalent chromium and cyanide contamination was known to be present at the site. Since the plant ceased operations wells 05 and 06 have been the production wells providing potable

water at the facility. Wells 05 and 06 are located in an area designated as Category 3 in the ECP; groundwater contamination was present but has been below the cleanup standards in this area. Contamination in Zone C or deeper has not been detected in this area previously.

Sample results from production wells 01 and 06 were reported in the 1991 RI Report. These samples were collected in 1984, 1985, 1986, and 1987. Samples were analyzed for methylene chloride, nonane, xylenes, chromium, hexavalent chromium, copper, total cyanide and free cyanide, nitrate, phosphate and selenite. Total chromium was detected in all four samples collected at concentrations ranging from 3.76 to 20.0 µg/L (below its MCL), hexavalent chromium was detected in one sample at 10 µg/L, total cyanide was detected in one sample at 7.9 µg/L and free cyanide was detected in one sample at 4.99 µg/L (below its MCL). Hexavalent chromium and free cyanide were detected in one sample each above their current RSLs. The data table from the RI is in Table 3.

A limited review of recent data from the production wells did not contain any data on hexavalent chromium or cyanide. The Army and the RLRA are cooperating on the collection of samples for hexavalent chromium and cyanide analysis from the production wells. Samples were collected for total chromium and hexavalent chromium analysis in June of 2014. The sample collected from Production Well 05 was reported to have total chromium at 7.1 µg/L below its MCL and hexavalent chromium at 5.5 µg/L below the new State MCL of 10 µg/L. The sample collected from Production Well 06 was reported to have total chromium at 6.5 µg/L, below its MCL and hexavalent chromium at 4.6 µg/L below the new State MCL. The total chromium results were flagged as "UN" tentative detection, during the validation process due to high total chromium results in the method blank (Appendix C). Samples for cyanide analysis have not been collected.

7.0 CONCLUSION

This ECP update identified two newly recognized environmental conditions at RBAAP: Galbestos panels containing PCBs and the presence of liquid PCBs in surface soils at Parcels A, 1 and 1a. The Army will work with the RLRA and the regulatory agencies regarding further investigation and remediation.

This ECP Update classifies the subject property into one of seven DoD ECP categories as defined by ASTM D 5746-98 (2002). The current ECP categories for the EDC transfer parcels are provided in Table 1 and in Figure 2.

8.0 CERTIFICATION

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR §312.10 of 40 Code of Federal Regulations 312 and I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property.

The 2006 ECP Report was reviewed and found to meet the requirements set forth in §4.6.2 of ASTM D6008-96(2005) and the narrative discussion and findings of that report are incorporated by reference into this ECP Report Update as if contained here in its entirety.

Erin Mauer 1 March 2017

Erin Mauer
BRAC Environmental Coordinator
Riverbank Army Ammunition Plant

9.0 REFERENCES

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Tables

Table 1
Summary of Environmental Condition of Property Findings
Environmental Condition of Property Report Update

Section	Building or Feature No.	Building Name/ Area Name	ECP Category	Updated ECP Category	Hazardous Substances	Petroleum	PCBs	Asbestos	Lead	Radiological	Radon	MEC	Acreage	Figure Coordinates	Comments
Sale Parcels															
Parcel 2															
42	N/A	AOC 5, Former Windrowed Area	3	3									0.97	D3	NFA status concurrence received from DTSC in June 1996 (as detailed in the April 15, 1996, Revision 2 of the RFI Phase 1 Work Plan - CH2M HILL, 2002). Category 3 based on groundwater contamination present, but below the MCL as defined by the ROD. No updates.
2004	N/A	North Utilities	3	3	V								7.50	C3	Category 3 based on groundwater contamination present, but below the MCLs as defined by the ROD.

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4,24	N/A	RBAAP-04/SWMU12, IWTP Effluent Sewer Line Break	3	3	V								0.71	A2	DTSC concurred with NFA status (October 30, 1995, version of the RFI Phase 1 Work Plan) and ROD. Category 3 based on groundwater contamination currently present, but below MCLs as defined by the ROD.
10, 34	42	Sanitary Wastewater Settling Ponds/Sludge Beds (RBAAP-10/SWMU 22)	3	3	V								2.21	C2	The sitewide ROD (USAEC, 1994) documented NFA for this site. Category 3 based on groundwater contamination currently present, but below MCLs as defined by the ROD. No updates.
1042	42	Building 42, Sewage Disposal Plant	3	3	V			A					0.01		Category 3 based on groundwater contamination present, but below the MCLs as defined by the ROD. No updates.

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2010		West Open Storage	3	3									5.93		Category 3 based on groundwater contamination present, but below the MCLs as defined by the ROD.
2000-GW		Open Area	3	3									2.14	E2	Category 3 based on groundwater contamination below the MCLs as defined by the ROD. No updates.
2000		Open Area	1	1										B2	None. No updates.
2001		North Railroad area	1	1										B2	None. No updates
Parcel 2A															
Parcel 2A		Open Space	3	3											Category 3 based on groundwater contamination present, but below the MCLs as defined by the ROD. No updates.
Parcel 4 (E/P Ponds)															

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1129 2024		Percolation/Evaporation Ponds (E/P Ponds) (RBAAP-11/ SWMU 23)	4	4			A	A					28.8		The ROD documented zinc-contaminated soil. This removal action and concluded that no further action was necessary at the ponds (USAEC, 1994). This area continues to be used for discharge of treated water, and is regulated under WDRs. The WDRs require ongoing groundwater monitoring at the E/P Ponds. This site was investigated for PCBs in the Galbestos investigation. None of the sediment samples in the E/P ponds contained PCBs exceeding the TSCA criteria (USACE, 2011).
Parcel 1															
49	N/A	AOC 10, Former Solid Waste Pile (Southeast Corner)	1	5			V						0.44	A7	Investigations determined PCB contamination was present in the soil. Remediation actions are underway.

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2012	N/A	South Open Storage	1	5			V						1.38	B7	Investigations determined PCB contamination was present in the soil. Remediation actions are underway.
2003	N/A	South Parking (Remainder of Parcel 1)	1	5			V						6.64		Investigations determined PCB contamination was present in the soil. Remediation actions are underway.
Parcel 1A															
2003	N/A	South Parking	1	5			V						2.13	E7	Investigations determined PCB contamination was present in the soil. Remediation actions are underway.
2003	N/A	South Parking (remainder of Parcel 1A)	3	5			V						2.24	E7	Originally Category 3 due to the groundwater contamination. Due to the recent soil investigations, PCB contamination was confirmed. Remediation actions underway.
EDC Parcels															
Parcel B															
2000	N/A	Open Land	1	1									31.0	A1, B1, C1, D1, E1	No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the area of Groundwater contamination.

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2001	N/A	North Railroad Area	1	1									2.12	B2	No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the area of Groundwater contamination.
Parcel A															
1, 22, 23	N/A	RBAAP-01, Landfill/ SWMU 10, Landfill (Southern Portion)/ SWMU 11, Landfill (Northern Portion)	5	4	V								5.52	A3	The landfill was investigated during the RI/FS (completed in 1993). The RI concluded that it was a major source of cyanide and a minor source of chromium contamination to the groundwater. The landfill underwent formal closure in 1996, and received formal "Construction Complete" certification on October 30, 1995. There are land use controls in place to maintain the cap and conduct groundwater monitoring as required by the site-wide ROD.

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2, 30, 1161	161	RBAAP-02, Waste Salt Disposal Pit	3	3	A								0.47	B3	Category 3 based on groundwater contamination present, but below the MCLs as defined by the ROD. NFA status for the Salt Disposal pit based on investigation results.
3	N/A	RBAAP-03, Groundwater Contamination	5	5	V								1.76	B5	Category 5 based on continuing LTM and operations of the GWTS until 2023. The MCLs have been updated and the groundwater monitoring plan has been updated since the last ECP.

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5, 7, 17, 44	13	RBAAP-05, Building 13, Chromium Pretreatment; RBAAP - 07 Phosphate Spill	3	3	V								0.09	D7	RBAAP-05: NFA status documented in site wide ROD. RBAAP-07: NFA status documented in letter from DTSC dated June 5, 1996, and is detailed in the April 15 1996 Revision 2 of the RFI phase I Work Plan. Category 3 based on groundwater contamination being below the MCLs as defined by the ROD. No updates
6, 43	N/A	RBAAP-06, IWTP H_2SO_4 Spill	7	5	V								0.05	B5	This spill was given NFA Status based on investigative results. Originally Category 7 based on location within SMWU 1 boundary. Update: The required remediation actions at SWMU 1 (IWTP) were completed in 2015. This area is now a Category 5 based on the groundwater contamination exceeds MCLs.

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8, 33, 56 1135	135	RBAAP-08, Southeast Storm Reservoir/ SWMU 21, Southeast Storm Reservoir/ AOC 16, Substation 5 and Storm Drain Discharge Basin/ Storm Drain Station	4	4	R			A					0.39, 0.32, 0.24, 0.27	A6	Category 4 based on investigation results. NFA status
9, 32	127	RBAAP-09, Northwest Storm Reservoir/ SWMU 20, Northwest Storm Reservoir	3	3	V								1.55	D2	Category 3 based on investigation results. NFA status. This area is outside of the groundwater contamination plume.
12	N/A	RBAAP-001-R-01, Former Pistol Range	7	1				A				S	0.35	E2	Originally Category 7 based on potential for metals contamination in soil. Results of the 2008 SI changed to Category 1. This area is outside of the groundwater contamination.

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13, 16, 19, 20, 31, 1043, 1044, 1173	IWTP Area	SWMU 1, Industrial Wastewater Treatment Plant (IWTP) SWMU 4 SWMU 7 SWMU 8 SWMU 19	7	5	V		G	V – 1043 A-1044					1.60	B5	Originally Category 7 based on location within SMWU 1 boundary. Update: The required remediation actions at SWMU 1 (IWTP) were completed in 2015/2016. Closure granted from DTSC in August 2016. Building 43 has galbestos panels, and will undergo remediation under the ESCA. Category 5 because groundwater contamination exceeds MCLs. .
14, 1174	174	SWMU 2, Hazardous Waste Storage Area (Drum Storage Facility)	5	5	V								0.14	B4	NFA status based on investigation results. Category 5 because groundwater contamination exceeds MCLs. .
15	20	SWMU 3, Empty Drum Storage Area (Railroad Car Off-Loading Area)	5	5	S								0.18	A5	NFA status based on investigation results. Category 5 because groundwater contamination exceeds MCLs. .

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18, 1180	1	SWMU 6, Chromium Reduction Unit (Building 1)	5	5	S		G						0.01	C5	NFA status based on investigation results. Galbestos panels were identified in building 1. These will be remediated under the ESCA. Category 5 because groundwater contamination exceeds MCLs. PCB remediation is on-going
21, 1177	177	SWMU 9, Equipment Wash Facility (Building 177 Triple Rinse Area)	5	5	V								0.03	C5	NFA status based on investigation results. Category 5 because groundwater contamination exceeds MCLs.
25	123	SWMU 13, Incinerator (Building 123)	5	5	S								0.01	B4	NFA status based on investigation results. Category 5 because groundwater contamination exceeds MCLs.
26, 1163	163	SWMU 14, Incinerator (Building 163)/ Incinerator	5	5	S			s					0.01	D5	NFA status based on investigation results. Category 5 because groundwater contamination exceeds MCLs.

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27	N/A	SWMU 15, Pesticide Storage Area (West of Building 11)	5	5	S								0.02	A5	NFA status based on investigation results. Category 5 because groundwater contamination exceeds MCLs. .
28, 1165	165	SWMU 16, Pesticide Storage Area (Building 165)	5	5	V								0.02	D4	NFA status based on investigation results. Category 5 because groundwater contamination exceeds MCLs. .
29, 1170	170	SWMU 17, Pesticide Storage Area (Building 170)	5	5	R			S					0.06	A4	NFA status based on investigation results. Category 5 because groundwater contamination exceeds MCLs.
36	N/A	SWMU 24, Industrial Waste Pipe Leak	4	5	R								0.02	D6	Category 4 based on investigation results. NFA status. Category 5 because groundwater contamination exceeds MCLs.

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37	1, 2, 3, 4, 5, 6, 7, 12, 15, 77, 137, 170	SWMU 25, Former Underground Storage Tanks 1, 6, 11A, 12, 12A, 12B, 15A, 15B, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37, T77, T137	3	3	V	V	G						N/A	A6, C6	Tanks 11A, 24, 25, 26, 27, 28, 29, 30, 31, and 32 were removed or closed in-place. NFA status based on investigation results. Category 3 based on groundwater contamination below the MCLs as defined by the ROD. Galbestos panels were identified in buildings 1, 2, 3, 4, 5, 6, 7, 12 and 15. These will be remediated under the ESCA.
38	4	AOC 1, Mortar Line Accumulation Area (Building 4)	3	3	S		G						0.04	D6	NFA status based on investigation results. Category 3 based on groundwater contamination below original MCLs as defined by the ROD. Galbestos panels were identified in building 4. These will be remediated under the ESCA.

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Section	Building or Feature No.	Building Name/ Area Name	ECP Category	Updated ECP Category	Hazardous Substances	Petroleum	PCBs	Asbestos	Lead	Radiological	Radon	MEC	Acreage	Figure Coordinates	Comments
39	9	AOC 2, Machine Shop Accumulation Area (Building 9)	5	5	S								0.06	D4	NFA status based on investigation results. No updates. Category 5 because groundwater contamination remediation is on-going.
40, 1015	15	AOC 3, Vehicle Maintenance Accumulation Area (Building 15)	5	5	V	V	G	V					0.02	D5	NFA status based on investigation results. Galbestos panels were identified in building 15. These will be remediated under the ESCA. Category 5 because groundwater contamination exceeds MCLs. PCB remediation is on-going.
41	N/A	AOC 4, Grenade Line Accumulation Area	5	5	S								0.03	D5	NFA status based on investigation results. No updates. Category 5 because groundwater contamination exceeds MCLs. .

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45	75	AOC 8A, Horizontal Aboveground Storage Tanks - Propane Storage Tanks	5	5	A								0.32	B4	NFA status based on investigation results. No updates. Category 5 because groundwater contamination exceeds MCLs. .
46	85	AOC 8B, Horizontal Aboveground Storage Tanks - Transformer Oil Storage Tanks (including the Transformer Oil Distribution System)	5	5	R								0.66	D6	NFA status based on investigation results. No updates. Category 5 because groundwater contamination exceeds MCLs. .
47, 1076	76	AOC 9A, Vertical Aboveground Storage Tanks – Fuel Oil Storage Tanks	3	3	S			A					0.07	A4	NFA status based on investigation results. Category 3 based on groundwater contamination below MCLs as defined by the ROD.
48, 1139	139	AOC 9B, Vertical Aboveground Storage Tanks - Fire Sprinkler Storage Tank	1	1	A			A					0.08	A7	No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the Area of Groundwater contamination. No updates.

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50, 1126, 1127	125, 126	AOC 11A, Loading Racks – Propane Farm Loading/Unloading	5	5	V								0.02	C4	NFA status based on investigation results. No updates. Category 5 because groundwater contamination exceeds MCLs. .
51, 1137	137	AOC 11B, Loading Racks – Fire Sprinkler Pumping Station	2	2	A			A					0.03	A7	Category 2 based on small lens of petroleum contaminated soil remaining beneath Building 137, associated with UST T137. No updates. This area is outside of the groundwater contamination plume.
52	Prod. Area and IWTP	AOC 12, Industrial Wastewater Collection System	3	3	V									B6	Category 3 based on investigation results. NFA status.
53, 1178	178	AOC 13, Draw Lube System (Building 178)	5	5	R			A					0.01	D6	NFA status based on investigation results. No updates. Category 5 because groundwater contamination exceeds MCLs. .

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54	Prod. Area and IWTP	AOC 14, Zinc-Cyanide Wastewater Collection System	3	3	S									B6	NFA status based on investigation results. Category 3 based on groundwater below MCLs as defined by the ROD.
55	13	AOC 15, Building 13 Temporary Wastewater Line	3	3	S									D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1001	1	Production Line	7	7			G	V	V		B		0.85	C6	Category 7 based on the potential for the soil beneath the remaining sumps or pits to be impacted by hazardous substances. This building was identified to have galbestos panels and is undergoing remediation under the ESCA. This area also falls with-in the groundwater contamination plume

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1002	2	Production Line	3	3			G	V	V				0.86	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building was identified to have galbestos panels and is undergoing remediation under the ESCA.
1003	3	Production Line	3	3			G	V	V				0.86	C6	Originally Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building was identified to have galbestos panels and is undergoing remediation under the ESCA.
	3	Sump 3-1	3	3										C6	
	3	Sump 3-2	3	3										C6	
	3	Sump 3-3	3	3										C6	
	3	Sump 3-6	3	3										C6	
	3	Sump 3-7	3	3										C6	
	3	Sump 3-8	3	3										C6	
	3	Sump 3-9	3	3										C6	
	3	Sump 3-10	3	3										C6	
	3	Sump 3-11	3	3										C6	
1004	4	Production Line	3	3			G	V					0.85	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
	4	Sump 4-1	3	3										C6	
	4	Sump 4-2	3	3										C6	
	4	Sump 4-4	3	3										C6	
	4	Sump 4-5	3	3										C6	

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	4	Sump 4-6	3	3										C6	This building was identified to have galbestos panels and is undergoing remediation under the ESCA. .
	4	Sump 4-7	3	3										C6	
	4	Sump 4-8	3	3										C6	
	4	Sump 4-9	3	3										C6	
	4	Sump 4-10	3	3										C6	
	4	Sump 4-11	3	3										D6	
1005	5	Production Line	3	3			G	V	V				0.86	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building was identified to have galbestos panels and is undergoing remediation under the ESCA.
	5	Sump 5-1	3	3										C6	
	5	Sump 5-2	3	3										C6	
	5	Sump 5-3	3	3										C6	
	5	Sump 5-5	3	3										C6	
	5	Sump 5-6	3	3										C6	
	5	Sump 5-8	3	3										C6	
	5	Sump 5-10	3	3										C6	
	5	Sump 5-11	3	3										C6	

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1006	6	Production Line	7	7	V		G	V	V				0.90	C6	Category 7 based on potential for the soil beneath the remaining sumps or pits to be impacted by hazardous substances. This building was identified to have galbestos panels and is undergoing remediation under the ESCA. This area also falls with-in the groundwater contamination plume
1006	6	Zinc Plater Cyanide Sump	7	7	V										Building 6 is Category 7 based on the potential for the soil beneath the remaining sumps or pits to be impacted by hazardous substances. No updates.
1007	7	Production Line	5	5			G	V	V				1.31	C5	No Updates. Category 5 because groundwater contamination exceeds MCLs. .
1008	8	Production Line – Press Room	7	7		V	G	V					1.13	A6	Building 8 is Category 7 based on the potential for the soil beneath the remaining sumps or
	8	Production Line Sump	7	7		V								A6	

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	8	4500 Ton Press Pit	7	7										A6	pits to be impacted by hazardous substances. This building was identified to have galbestos panels and is undergoing remediation under the ESCA. This area also falls with-in the groundwater contamination plume.
1009	9	Machine Shop/Offices	5	5	V	V		V			B		0.92	D5	No Updates. Category 5 because groundwater contamination remediation is on-going.
1010	10	Crib/Warehouse/Offices, Former National Guard	5	5				V					0.48	C5	Category 5 because groundwater contamination exceeds MCLs. . Pending further TPH analysis.

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1011	11	Paint and Oil Storage, Oil Recycling and Transport See EBS 1998	7	7	V	V	V G	V					0.22	A5	Category 7 based on soil samples that identified Aroclor-1260 at concentrations ranging from 0.4 mg/kg to 1 mg/kg (above the Industrial PRG of 0.74 mg/kg). This building has galbestos panels, and will undergo remediation under the ESCA. This also falls within groundwater contamination plume. Pending further TPH and PCB analysis.

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1012	12	Boiler House	7	7	V	V	G	V	V				0.16	A5	Category 7 based on soil samples that identified chromium in one sample at a concentration of 144 mg/kg (above the industrial PRG of 64 mg/kg). This building has galbestos panels, and will undergo remediation under the ESCA. This also falls within groundwater contamination plume. Pending further TPH and Metals analysis.
1013	13	Production Line	5	5				V			B		0.08	D6	No Updates. Category 5 because groundwater contamination exceeds MCLs. .
1014	14	Dispensary/Locker Rooms, Security Office	5	5		V		V			B		0.28	D5	No Updates. Category 5 because groundwater contamination exceeds MCLs. .

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1016	16	Offices and Gate House	5	5				S			B		0.11	E5	No Updates. Category 5 because groundwater contamination exceeds MCLs. .
1017	17	Administrative Offices	5	5				S	V				0.20	E5	No Updates. Category 5 because groundwater contamination exceeds MCLs. .
1018	18	Cafeteria and Offices	5	5				A					0.07	E5	No Updates. Category 5 because groundwater contamination exceeds MCLs. .
1019	19	Production Restrooms	3	3				V					0.01	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1021	21	Plant Cafeteria	3	3				V					0.16	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.

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1022	22	Aisleway and Office	3	3				V					0.05	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1022	22A	Training Room	3	3				V						C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1023	23	Aisleway and Office	3	3				V					0.06	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1024	24	Aisleway and Gage Laboratory	3	3				V					0.05	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1025	25	Aisleway and Acctg Storage Area	3	3				V	V				0.06	C6	Category 3 based on groundwater contamination below MCLs at the time of the ROD.

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1026	26	Aisleway and Instrument Storage Area	3	3				V					0.05	C6	Category 3 based on groundwater contamination below MCLs at the time of the ROD.
1027	27	Restroom and Passage	3	3				S					0.04	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1028	28	Restroom and Passage	3	3				S					0.03	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1029	29	Restroom	3	3				S	V				0.03	B6	Category 3 based on groundwater contamination present but below MCLs as defined by the ROD.
1030	30	Restroom and Passage	3	3				S	V				0.03	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.

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1031	31	Restroom and Passage	3	3				S					0.03	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1032	32	Restroom and Passage	3	3				S	V				0.03	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1033	33	Passage and Distribution PNL – S.S. No. 1	5	5			G	S	V				0.06	D6	This building has galbestos panels, and will undergo remediation under the ESCA. Category 5 because groundwater contamination exceeds MCLs.
1034	34	Passage and Office	5	5				S					0.05	D6	No updates. Category 5 because groundwater contamination remediation is on-going.
1035	35	Passage and Emerg. Gen No. 7	3	3				S	V				0.06	D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.

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1036	36	Passage	3	3				S					0.03	D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1037	37	Passage and Office	3	3				S	V				0.05	D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1038	38	Passage	3	3				S					0.05	D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1039	39	Central Salvage Area	3	3			G	S					0.04	D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.

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1045	45	Production Line	3	3			G	A					0.17	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.
1046	46	Production Line	3	3			G	V					0.17	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.
1047	47	Production Line and Emerg. Gen No. 2 (Generator Removed)	3	3			G	V					0.16	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.

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1048	48	Production Line and Office	3	3			G	V					0.18	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.
1048	48A	Former Office	3	3			G	A						B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.
1049	49	Production Line and Emerg. Gen No. 4 and 5	3	3			G	V					0.23	B6	Category 3 based on groundwater contamination present but below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.

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1050	50	Production Line and Emerg. Gen No. 6	3	3			G	S					0.22	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.
1051	51	Laboratory, Chemical and Metallurgical	3	3				V					0.07	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1052	52	Transformer Area – Substation No. 10	3	3				S					0.01	A6	Category 3 based on groundwater contamination below MCLs as defined by the ROD..
56, 1053	53	AOC-16; Transformer Area – Substation No. 5	4	4									0.03	A5	Category 4 based on investigation results. NFA status. No updates. .

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1054	54	Transformer Area – Substation No. 13	3	3			V	S					0.03	A6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. .
1055	55	Transformer Area – Substation No. 9	3	3				S					0.05	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1056	56	Transformer Area – Substation No. 7	3	3				S					0.02	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1057	57	Transformer Area – Substation No. 12	3	3				S	V				0.01	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1058	58	Transformer Area – Substation No. 8	3	3				S					0.01	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.

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1059	59	Transformer Area – Substation No. 6	3	3				S					0.02	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1060	60	Transformer Area – Substation No. 11	3	3				S					0.02	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. .
1061	61	Cooling Tower Control House	3	3				S					0.01	A7	Category 3 based on groundwater contamination below MCLs as defined by the ROD. .
1062	62	Facilities Eng. Store House	3	3				S					0.01		Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1064	64	Fuel Oil Unloading Serv. Bldg.	5	5				A					0.01	A4	No updates. Category 5 because groundwater contamination exceeds MCLs. .

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1073	73	Hose Cart House No. 1, Storage	7	5				A					0.01	B5	Originally Category 7 based on location within SMWU 1 boundary. Update: The required remediation actions at SWMU 1 (IWTP) were completed in 2015/2016. Category 5 because groundwater contamination exceeds MCLs. .
1074	74	Compressor House, Propane Stor. Area	3	3		V							0.03	B4	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1075	75	Propane Storage Area	5	5	V			A						B4	No updates. Category 5 because groundwater contamination exceeds MCLs. .

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Section	Building or Feature No.	Building Name/ Area Name	ECP Category	Updated ECP Category	Hazardous Substances	Petroleum	PCBs	Asbestos	Lead	Radiological	Radon	MEC	Acreage	Figure Coordinates	Comments
1077	77	Sulfuric Acid and Caustic Soda Storage	7	5				A					0.02	A5	Originally Category 7 based on location within SMWU 1 boundary. Update: The required remediation actions at SWMU 1 (IWTP) were completed in 2015/2016. Category 5 because groundwater contamination exceeds MCLs. .
1078	78	Oil Room Building	3	3				V					0.03	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1080	80	Varnish Stripping Building	3	3			G	V					0.05	D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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Environmental Condition of Property Report Update

Section	Building or Feature No.	Building Name/ Area Name	ECP Category	Updated ECP Category	Hazardous Substances	Petroleum	PCBs	Asbestos	Lead	Radiological	Radon	MEC	Acreage	Figure Coordinates	Comments
1081	81	Production Line	3	3			G	S					0.25	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.
1082	82	Tocco Generator and Emergency. Generator No. 9	3	3				A					0.04	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1083	83	Plating Rack Repair Area	3	3				V					0.01	D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1084	84	Loading Dock with Canopy	3	3				A							Category 3 based on groundwater contamination below MCLs as defined by the ROD.

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1085	85	Transformer Oil Pump Building	5	5				A					0.01	E6	No updates. Category 5 because groundwater contamination remediation exceeds MCLs. .
1087	87	Storage Building	5	5				A					0.01	D5	No updates. Category 5 because groundwater contamination remediation exceeds MCLs. .
1095	95	Transformer Area – Substation No. 1	7	6			V	A					0.01	D5	Category 7 based on potential for PCBs to have impacted the soil adjacent from the transformer (PCB concentration of 106 ppm). Pending further PCB Analysis and remediation
1096	96	Transformer Area – Substation No. 2	3	3			V	A					0.01	D5	Category 3 based on groundwater contamination below MCLs as defined by the ROD.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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1097	97	Transformer Area – Substation No. 3	7	6			V	A					0.02	A5	Category 7 based on potential for PCBs to have impacted the soil adjacent from two transformers (PCB concentrations of 64 ppm and 33 ppm). Pending further PCB Analysis and remediation.
1098	98	Transformer Area – Substation No. 4	5	5				A					0.02	C6	No updates. Category 5 because groundwater contamination remediation exceeds MCLs. .
1099	99	Transformer Area – Substation No. 14	5	5				A					0.02	C5	No updates. Category 5 because groundwater contamination remediation exceeds MCLs. .
1100	100	Transformer Area – Substation No. 15	3	3				A					0.02	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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1101	101	Transformer Area – Substation Spare	7	6				A					0.01	D4	Category 7 based on potential for PCBs to have impacted the soil adjacent from two transformers. Pending further PCB Analysis and remediation.
1102	102	Water Well No. 1	5	5	V			A					0.01	D5	No updates. Category 5 because groundwater contamination remediation exceeds MCLs. .
1103	103	Water Well No. 2	3	3				A					0.01	N/A	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1104	104	Water Well No. 3	5	5				A					0.01	A4	No updates. Category 5 because groundwater contamination exceeds MCLs.
1105	105	Water Well No. 4	4	4				A					0.01	E6	Originally Category 4 based on location with AOC 8B. No updates.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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1106	106	Water Well No. 5	3	3	V			A					0.01	C7	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1107	107	Covered Passage	5	5				S					0.04	C6	No updates. Category 5 based on groundwater contamination exceeding MCLs
1108	108	Main Transformer Subst. No. 1	3	3			S	A					0.12	E6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1109	109	Main Transformer Subst. No. 2 and 3	7	7			S	A					0.11	E6	Category 7 based on potential for PCBs to have impacted the soil adjacent from two transformers. No updates.
1110	110	Terminal House	4	4				A					0.01	D6	Originally Category 4 based on location with AOC 8B. No updates.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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1114	114	Tank, Water, Storage, 100,000 Gallons	5	5	N	N	N	A		N		N	0.02	D5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1117	117	Cooling Tower, Main Plant	3	3	S			A					0.06	B7	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1118	118	Cooling Tower, Boiler House	5	5				A					0.01	A5	Category 5 because groundwater contamination remediation exceeds MCLs. .
1119	119	Cooling Tower, Steel Plant	7	5				A					0.01	B5	Originally Category 7 based on location within SMWU 1 boundary. Update: The required remediation actions at SWMU 1 (IWTP) were completed in 2015. Category 5 because groundwater contamination exceeds MCLs. .
1120	120	Steel Plant and Emerg. Gen. No. 10	5	5	V	V		V			B		1.31	C5	No updates. Category 5 because groundwater contamination exceeds MCLs. .

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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Environmental Condition of Property Report Update

Section	Building or Feature No.	Building Name/ Area Name	ECP Category	Updated ECP Category	Hazardous Substances	Petroleum	PCBs	Asbestos	Lead	Radiological	Radon	MEC	Acreage	Figure Coordinates	Comments
1121	121	Loading Dock, Steel Plant	5	5				A					0.20	C4	No updates. Category 5 because groundwater contamination remediation is on-going.
1122	122	Crane Runway and Steel Storage Area	5	5				S					0.45	C4	No updates. Category 5 because groundwater contamination remediation is on-going.
1127	127	Storage Sewage Disposal Plant	3	3	V			A					1.55	E2	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1130	130	Garage	5	5		V		A					0.06	D5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1131	131	Process Water Tank and System	3	3				A						A7	Category 3 based on groundwater contamination below MCLs as defined by the ROD.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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Section	Building or Feature No.	Building Name/ Area Name	ECP Category	Updated ECP Category	Hazardous Substances	Petroleum	PCBs	Asbestos	Lead	Radiological	Radon	MEC	Acreage	Figure Coordinates	Comments
1133	133	Aisleway from Bldg. 10 to Line 7	5	5			G	S					0.06	B5	Category 5 because groundwater contamination exceeds MCLs. This building has galbestos panels, and will undergo remediation under the ESCA.
1134	134	Restroom at Line 7	5	5				S					0.02	C6	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1145	145	Transformer Substation No. 17	7	6			V	S					0.03	B5	Category 7 based on potential for PCBs to have impacted the soil adjacent from two transformers (PCB concentrations of 28 ppm and 134 ppm). Pending further PCB Analysis and remediation
1146	146	Transformer Substation No. 18	3	3			V	S					0.02	D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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Section	Building or Feature No.	Building Name/ Area Name	ECP Category	Updated ECP Category	Hazardous Substances	Petroleum	PCBs	Asbestos	Lead	Radiological	Radon	MEC	Acreage	Figure Coordinates	Comments
1147	147	Transformer Substation No. 19	3	3				S					0.02	D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1148	148	Cooling Tower, Building 13	3	3				A					0.01	D6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1150	150	Compressor, Air	5	5		V		A					0.01	D6	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1151	151	Compressor, Air	5	5		V		A					0.01	B5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1152	152	Motor Generator Housing	5	5		V		S					0.02	B5	No updates. Category 5 because groundwater contamination exceeds MCLs. .

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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Environmental Condition of Property Report Update

Section	Building or Feature No.	Building Name/ Area Name	ECP Category	Updated ECP Category	Hazardous Substances	Petroleum	PCBs	Asbestos	Lead	Radiological	Radon	MEC	Acreage	Figure Coordinates	Comments
1154	154	Compressor, Air	5	5		V		A					0.01	C5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1155	155	Compressor, Air	3	3		V		A					0.01	A6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. .
1156	156	Production Building – Heat Treat	3	3				A					0.12	B6	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1157	157	Compressor, Air	3	3				A					0.02	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. .
1158	158	Water Well No. 6	3	3	V			A					0.01	B7	Category 3 based on groundwater contamination present but below MCLs as defined by the ROD.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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Section	Building or Feature No.	Building Name/ Area Name	ECP Category	Updated ECP Category	Hazardous Substances	Petroleum	PCBs	Asbestos	Lead	Radiological	Radon	MEC	Acreage	Figure Coordinates	Comments
1159	159	Sandblast Building	5	5				A					0.01	A5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1160	160	Covered Storage Warehouse	3	3			G	V					0.44	C6	Category 3 based on groundwater contamination below MCLs as defined by the ROD. This building has galbestos panels, and will undergo remediation under the ESCA.
1162	162	Autodin A.B. Terminal Bldg - Training Rm	5	5				S			X		0.03	E5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1164	164	Paint Pumping Building	5	5				V					0.02	D5	No updates. Category 5 because groundwater contamination exceeds MCLs. .

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1166	166	Paint Pumping Building	5	5				A					0.01	D6	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1167	167	Air Compressor No. 8	5	5				A					0.01	B4	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1169	169	Paint Spraying Facility	5	5	V			S					0.02	A4	Pending further VOC Analysis. Category 5 because groundwater contamination exceeds MCLs. .
1172	172	Former Fire Department	5	5				S			B		0.09	A4	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1175	175	Generator Building	3	3				A							Category 3 based on groundwater contamination below MCLs as defined by the ROD.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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Section	Building or Feature No.	Building Name/ Area Name	ECP Category	Updated ECP Category	Hazardous Substances	Petroleum	PCBs	Asbestos	Lead	Radiological	Radon	MEC	Acreage	Figure Coordinates	Comments
1176	176	Switching Station (Electrical)	3	3				S							Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1177	177	Equipment Wash Facility, Sump, Oil water separator.	5	5	V			A					0.03	C5	No updates. Category 5 because groundwater contamination remediation is exceeds MCLs. .
1181	181	Phosphate Facility	3	3				A					0.09	D7	Category 3 based on groundwater contamination below MCLs as defined by the ROD. .
1182	182	Ground Water Treatment Facility	3	3	V			A					0.24	B3	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
1184	184	Flammable Storage Warehouse	5	5	V			A						D5	No updates. Category 5 because groundwater contamination exceeds MCLs. .

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1185	185	Air Compressor Building	3	3				A							Category 3 based on groundwater contamination below MCLs as defined by the ROD. .
1186	186	Haz-Bin Storage Containment Structure	5	5	V			A						B5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1187	187	Haz-Bin Storage Containment Structure	5	5	V			A						D5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1188	188	Haz-Bin Storage Containment Structure	1	1	V			A					0.01	A7	No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the area of Groundwater contamination. No updates.
1189	189	Land Vehicle Fuel Disp Sta Gas/Diesel	5	5		V								D5	No updates. Category 5 because groundwater contamination exceeds MCLs. .

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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1190	190	Land Vehicle Fuel Disp Sta Propane	5	5	V			A						D5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1192	192	Ground Water Treatment Plant Office	3	3	N	N	N	A		N			0.02	B3	Category 3 based on groundwater contamination below MCLs as defined by the ROD. .
1195	195	Transformer Substation No. 20	5	5			A							C5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
1196	196	Transformer Substation No. 21	5	5			A							B5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2002		West Parking	5	5									6.38	E3	No updates. Category 5 because groundwater contamination exceeds MCLs. .

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2003		South Parking	3	3									2.24	E7	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
2005		West Utilities	5	5									1.59	D4	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2006		East Utilities	5	5									1.28	A4	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2007		Southeast Utilities	1	1									3.92	A7	No updates. No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the Area of Groundwater contamination
2007		Southeast Utilities	3	3									3.08	A7	Category 3 based on groundwater contamination below MCLs as defined by the ROD.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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2008		South Utilities	5	5									1.38	E6	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2009		North Open Storage	5	5									2.40	C3	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2011		Central Storage	5	5									3.49	C5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2013		North Warehouse Storage	5	5									1.40	B4	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2014		West Warehouse Storage	5	5									0.22	D5	No updates. Category 5 because groundwater contamination exceeds MCLs. .

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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2015		Water Storage	5	5									0.16	A4	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2016		South Warehouse Storage	3	3									3.39	C7	Category 3 based on groundwater contamination below MCLs as defined by the ROD. .
2017		West Railroad Storage	3	3									0.99	E7	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
2018		East Railroad Storage	3	3									3.34	A4	Category 3 based on groundwater contamination below MCLs as defined by the ROD.
2019		Fuel Storage	5	5									1.31	B4	No updates. Category 5 because groundwater contamination exceeds MCLs. .

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

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Environmental Condition of Property Report Update

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2020		Hazardous Waste Storage	5	5									1.17	B4	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2021		Administration Open Area	5	5									1.43	E5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2022		Medical Open Area	5	5									0.78	D5	No updates. Category 5 because groundwater contamination exceeds MCLs. .
2023		Production Open Area	5	7									8.52	C5	No updates. This buildings around this area have been identified to have galbestos panels. Changed to Category 7 due to pending PCB soil investigation.

Environmental Condition of the Property Categories:

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

Category 1: Areas in which no release or disposal of hazardous substances or petroleum products has occurred, and to which there has been no migration of such substances from adjacent areas.

Category 2: Areas in which only release or disposal of petroleum products has occurred.

Category 3: Areas in which release, disposal, or migration of hazardous substances has occurred, but in concentrations that do not require a removal or other remedial response.

Category 4: Areas in which release, disposal, or migration of hazardous substances has occurred, but all removal or other remedial actions necessary to protect human health and the environment have been taken.

Category 5: Areas in which release, disposal, or migration of hazardous substances has occurred, and removal or other remedial actions are under way, but all required actions have not yet been taken.

Category 6: Areas in which release, disposal, or migration of hazardous substances has occurred, but required remedial actions have not yet been completed.

Category 7: Areas that have not been evaluated or require additional evaluation.

Notes: V – Verified; S – Suspected; N – Not Suspected; A – Absent; R – Removed/Remediated; X – Radon measured > 4.0 pCi/L; B – Radon measured < 4.0 pCi/L; G – PCBs galbestos siding.

TABLE 2 – Riverbank Army Ammunition Plant Drinking Water Wells

Name	Status	Station Code	Well Depth (feet)
Well 01	Standby Raw	5000211-001	372
Well 05	Active Raw	5000211-004	90
Well 06	Active Raw	5000211-003	185
Well 01 – Treated	Standby Treated	5000211-00701TC	430
Well 05 – Treated	Active Treated	5000211-00505TC	710
Well 06 – Treated	Active Treated	5000211-00606TC	605

TABLE 3 – Production Wells 1 & 6 Analytical Data 1984 thru 1987

From the 1991 RBAAP Remedial Investigation Table 6-6

Table 6-6

Summary of Chemicals Detected in Production Wells 1 & 6
at the RBAAP Facility
(Units: ug/L) (a)

Chemical	Frequency of Detection (b)	Range of Detection Limits	Range of Detected Concentrations	Range of Background Concentrations (d)
Organics:				
* Methylene chloride	1/2	6.9	45.0	NA
* Nonane	1/1	NR	100.0	NA
* Xylenes	1/1	NR	40.0	NA
Inorganics:				
* Chromium (total)	4/4	NR	3.76-20.0	<2.5
* Hexavalent chromium	1/3	5.00-10.00	10.0	<2.5
* Copper	2/2	NR	1.0-2.0	<25.0
* Cyanide (total)	1/4	11	7.9	<2.5
* Cyanide (free)	1/1	NR	4.99	<2.5
Nitrate	2/2	NR	3,960-4,000 (c)	3,200
* Phosphate	1/2	40	40.0	<200
* Selenium	2/2	NR	4.0	<5.0

(a) Data from samples collected on July 25, 1984, March 8, 1985, January 13, 1986, and October 23, 1987. Only certain parameters were analyzed on certain dates from the two wells.
(b) The number of samples in which the contaminant was detected divided by the total number of samples analyzed.
(c) Nitrate/nitrite - non-specific.
(d) Background concentrations from wells MW-67D, MW-61C, and MW-68C. (Data from aquifer C were used to fill data gaps).

NA = Not analyzed.
NR = Not reported.

TABLE 4 – PCB AND PCB-CONTAMINATED TRANSFORMERS

Location	Transformer	PCB (ppm)
Substation 1	1	106
Substation 3	1	64
Substation 6	1	50
Substation 13	1	248
	3	53
Substation 16	1	60
Substation 17	1	134
Substation 18	1	35,000

Figures

Appendix A

Documentation of No Further Action (NFA) Determinations

Appendix B

EDR Report for RBAAP
24 January 2014

Appendix C

Ahtna Report August 11, 2014
Chromium and Hexavalent Chromium Results
For Production Wells 5 and 6