UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100, BOSTON, MASSACHUSETTS 02109-3912

Certified Mail – Return Receipt Requested

JUL 22 2014

Salvatore Morabito
Manager of Construction, Security and Safety
Fairfield School District
501 Kings Highway East
Fairfield, Connecticut 06825

Re: PCB Cleanup and Risk-Based Disposal Approval under 40 CFR §§ 761.61(a) and (c)
Riverfield Elementary School
1625 Mill Plain Road, Fairfield, Connecticut

Dear Mr. Morabito:

This is in response to the Notification[1] by the Fairfield School District ("Fairfield") for approval of a plan to address PCB-contamination at the Riverfield Elementary School located at 1625 Mill Plain Road in Fairfield, Connecticut, in accordance with the Toxic Substances Control Act ("TSCA"), 15 USC § 2601 *et seq*. Specifically, PCB-contaminated materials (e.g., caulk, waterproofing felt, and associated building substrates) in the 1971 gymnasium addition exceed allowable PCB levels under the PCB regulations at 40 CFR §§ 761.20(a), 761.61, and 761.62 .

Fairfield has proposed a plan that includes removal of non-liquid products that have PCB concentrations greater than or equal to ("≥") 50 parts per million ("ppm"), and removal and/or encapsulation of PCB-contaminated building substrates with PCB concentrations greater than (">") 1 ppm. Fairfield has also proposed in-place interim management of the ≥ 50 ppm PCB PCB-contaminated waterproofing felt and associated PCB-contaminated building substrates (i.e., exterior/interior walls that have been in contact with the PCB-contaminated waterproofing felt) located between the exterior walls and interior walls, except in locations where a wall will be disturbed or demolished as part of the expansion/renovation activities.

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[1] Information was submitted by Woodard & Curran on behalf of the Fairfield School District to support a PCB cleanup and risk-based disposal approach under 40 CFR §§ 761.61(a) and (c). Information was submitted dated January 7, 2014 (PCB Remediation Plan); March 4, 2014 (Response to EPA questions on PCB Remediation Plan); March 28, 2014 (emails Revised Figure 5-1, gymnasium door plan summary, verification sampling and gym wall removal); May 8, 2014 (email gymnasium door and expansion joint plan summary); May 9, 2014 (emails clarification on removal/encapsulation distance); and May 12, 2014 (emails public outreach information). These submittals shall be referred to as the "Notification."

Fairfield has proposed that products located within the 1958/59 construction area and certain products located within the 1971 gym addition area (i.e., louver caulk, vinyl cove base mastic, vinyl floor glue, and wood floor sealant and glue) containing PCB concentrations at less than ("<") 50 ppm meet the criteria for *excluded PCB products* under § 761.3. Under the PCB regulations, *excluded PCB products* are unregulated for cleanup or disposal. However, Fairfield is proposing to remove and dispose of these products under Connecticut Department of Energy and Environmental Protection ("CTDEEP") requirements as part of the renovation work.

With the exception of certain verification sampling requirements under 40 CFR § 761.61(a)(6) and the encapsulation of PCB-contaminated *porous surfaces*, and the proposed in-place interim management of areas of ≥ 50 ppm PCB waterproofing felt and associated substrates, the proposed plan is consistent with the requirements for removal/disposal of *PCB bulk product waste* under § 761.62 and for cleanup and disposal of *PCB remediation waste* under § 761.61(a). Based on the data provided to date, and the proposed abatement plan, the alternative sampling plan is reasonable for the purpose of determining if the PCB cleanup standard has been met and if encapsulation is necessary. The proposed encapsulation of PCB-contaminated *porous surfaces* should effectively prevent direct exposure of the PCB-contaminated *porous surfaces* to building users provided the physical barriers are maintained. However, the management and eventual disposal of the areas of waterproofing felt and associated substrates that are not proposed to be removed as part of the current project, and that will remain in place between the exterior and interior walls of the gymnasium for an additional period of time, will be addressed under a separate consent agreement and final order under the authority of TSCA and 40 CFR Part 22.

Based on EPA's review of the information provided, the proposed PCB cleanup and disposal work is acceptable and will not pose an unreasonable risk of injury to health or the environment when conducted in accordance with the Notification and this Approval and the conditions of Attachment 1. EPA applies this unreasonable risk standard in accordance with the PCB regulations at 40 CFR §761.61(c) and with Section 6(e) of TSCA, 15 USC § 2605(e).

Fairfield may proceed with its project in accordance with 40 CFR §§ 761.61(a), 761.61(c), 761.62, the Notification, and this Approval, subject to the conditions of Attachment 1. Please be aware that this Approval requires Fairfield to conduct outreach activities for the school community, including parents, students, and the school employees concerning the PCB remediation work. Documentation of the outreach effort shall be submitted to EPA. (Attachment 1, Approval Condition 9).

This Approval may be revoked, suspended and/or modified as described in Attachment 1 if the EPA determines that implementation of this Approval may present an unreasonable risk of injury to health or the environment. Nothing in this Approval is intended or is to be construed to prejudice any right or remedy concerning PCBs or other federally-regulated contaminants at the Site otherwise available to the EPA under Section 6 of TSCA, 15 USC 2605, 40 CFR Part 761, or other provisions of federal law.

EPA is requiring monitoring of indoor conditions under this Approval and the monitoring plan requirements include a community outreach component (see Attachment 1, Condition 20). EPA is reserving its rights to require additional investigation or mitigation measures at the school should the monitoring results indicate an unreasonable risk of injury to school users.

This Approval does not address the waterproofing felt and associated substrates located between the exterior and interior walls of the gymnasium that will not be removed as part of the current renovation project at the school. As noted above, management of certain areas of waterproofing felt and associated substrates that will remain in place until properly disposed of will be addressed under a separate consent agreement and final order. Areas of waterproofing felt and associated substrates between the gymnasium building walls that will be removed under this Approval will be disposed of in accordance with 40 CFR § 761.62.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been conducted and completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

James T. Owens, III
Director, Office of Site Remediation & Restoration

cc J. Hamel, Woodard & Curran
G. Trombly, CTDEEP
B. Toal, CTDPH
File

Attachment 1: PCB Approval Conditions
Attachment 2: Gymnasium Doors Building Materials PCB Remediation Plan Summary
Attachment 3: Figure 5-1 ≥ 50 ppm PCB Remediation Areas

ATTACHMENT 1

PCB CLEANUP AND RISK-BASED DISPOSAL APPROVAL CONDITIONS
RIVERFIELD ELEMENTARY SCHOOL
1625 MILL PLAIN ROAD
FAIRFIELD, CONNECTICUT

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of TSCA, 15 USC. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Riverfield Elementary School as identified in the Notification [2] and located in the 1971 gymnasium addition (hereinafter "the Site").

   a. In the event that the Fairfield School District ("Fairfield") identifies other PCB-contaminated wastes subject to cleanup and disposal under the PCB regulations, Fairfield will be required to notify EPA and clean up the PCB-contaminated wastes in accordance with 40 CFR Part 761.

   b. Fairfield may submit a separate plan to address the PCB contamination or may modify the Notification to incorporate cleanup of the PCBs under this Approval in accordance with Condition 21.

2. Fairfield shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.

3. In the event that the plan and activities described in the Notification differ from the conditions specified in this Approval, the conditions of this Approval shall govern. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.

4. Fairfield shall be responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in PCB maintenance, abatement, or remedial activities conducted at the Site. If at any time Fairfield has or receives information indicating that Fairfield or any other person has failed, or may have failed, to comply with any provision of this Approval or the federal PCB regulations under 40 CFR Part 761, it shall report the information to EPA in writing within 24 hours of having or receiving the information.

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[2] Information was submitted by Woodard & Curran on behalf of the Fairfield School District to support a PCB cleanup and risk-based disposal approach under 40 CFR §§ 761.61(a) and (c). Information was submitted dated January 7, 2014 (PCB Remediation Plan); March 4, 2014 (Response to EPA questions on PCB Remediation Plan); March 28, 2014 (emails Revised Figure 5-1, gymnasium door plan summary, verification sampling and gym wall removal); May 8, 2014 (email gymnasium door and expansion joint plan summary); May 9, 2014 (emails clarification on removal/encapsulation distance); and May 12, 2014 (email public outreach information). These submittals shall be referred to as the "Notification".

5. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release Fairfield from compliance with any applicable requirements of federal, state or local law; or 3) release Fairfield from liability for, or otherwise resolve any violations of federal, state or local law.

6. Fairfield shall comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes that may be generated at the Site during renovation or maintenance activities while this Approval is in force. In the event of a new spill or release of PCBs during maintenance, renovation, abatement, or remedial activities, Fairfield shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.

7. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761, Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

8. This Approval may be revoked if the EPA does not receive written notification from Fairfield of its acceptance of the conditions of this Approval within 10 business days of receipt.

9. Fairfield shall conduct outreach activities for the school community, to include students, parents, and school employee on the PCB remediation work. Fairfield shall submit information on its outreach activities within 30 days of receipt of this Approval.

10. Prior to initiating onsite PCB work at the school under this Approval, Fairfield shall submit the following information for EPA review and/or approval:

    a. a certification signed by its selected contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;

    b. a contractor work plan, prepared and submitted by the selected contractor(s), detailing the procedures that will be employed for removal of PCB-contaminated materials, for containment design, and for air monitoring during cleanup, removal, and handling of PCB-containing materials. This work plan should also include information on waste storage, handling, and disposal for each waste stream type and for equipment decontamination; and,

    c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical methods and quality assurance requirements specified in the Notification and in this Approval.

CLEANUP AND DISPOSAL CONDITIONS

11. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools or construction of a negative air containment system with a HEPA ventilation system to control emissions, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.

12. All visible residues of PCB-contaminated caulk (i.e., *PCB bulk product waste*) shall be removed and associated *porous surfaces* shall be removed or encapsulated as described in the Notification and as detailed on Attachments 2 and 3.

    a. All post-decontamination verification sampling of *porous surfaces* shall be performed on a bulk basis (i.e., mg/kg). Samples shall be collected in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum sampling depth interval of 0.5 inches and at the frequency detailed in the Notification and shown on Attachment 2.

    b. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.

13. Fairfield shall conduct initial post-abatement indoor air sampling and surface wipe sampling for encapsulated *porous surfaces* for PCBs to determine the effectiveness of the encapsulation.

    a. Initial post-abatement sampling

        i) Indoor air sampling shall be conducted in accordance with EPA Method TO-4A or TO-10A. Sufficient sample volumes shall be collected to provide a minimum laboratory reporting limit of less than ("<") 0.05 $\mu g/m^3$ for total PCBs. PCB analysis shall be conducted for PCB homologues and/or PCB congeners by EPA Method 680, EPA Method 1668 or an equivalent method.

        ii) Surface wipe samples (e.g., encapsulated CMU and brick) shall be collected on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. $\mu g/100\ cm^2$). Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 and chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another method(s) is validated according to Subpart Q.

iii) In the event that the PCB concentration in a wipe sample result or air sample result is greater than (">") 1 µg/100 cm^2 or > 0.10 µg/m^3, respectively, Fairfield shall contact EPA for further discussion and direction on alternatives, which may include development of a site-specific risk exposure assessment or initiation of additional measures and/or removal and disposal of PCBs.

b. Fairfield shall submit a long-term monitoring and maintenance plan ("MMP") for indoor air and encapsulated surfaces to monitor the long-term effectiveness of the encapsulants. (See Condition 20).

14. All PCB waste (regardless of concentration) generated as a result of any activity that disturbs PCB-contaminated materials at the Site, including but not limited to maintenance, renovation, abatement, or remedial activities, shall be marked in accordance with 40 CFR § 761.40; stored in a manner prescribed in 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below:

a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g).

b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).

c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under 40 CFR § 761.60.

DEED RESTRICTION AND USE CONDITIONS

15. Within sixty (60) days of completing the activities described in the Notification and authorized under this Approval, Fairfield shall submit for EPA review and approval, a draft deed restriction for the Site. The deed restriction shall include:

a. a description of the extent and levels of contamination at the Site following cleanup and removal of PCB-containing materials;

b. a description of the actions taken at the Site and of the use restrictions for the Site, as applicable, and a figure identifying the locations of encapsulated surfaces;

c. the monitoring requirements for indoor air and encapsulated surfaces, which may be addressed by the MMP (see Condition 20); and,

d. within seven (7) days of receipt of EPA's approval of the draft deed restriction, Fairfield shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

SALE, LEASE, OR TRANSFER CONDITIONS

16. The Site owner shall notify the EPA of the sale, lease or grant of any real estate interest in the Site, in writing, no later than sixty (60) days prior to such action. This notification shall include the name, address, and telephone number of the new owner(s). In the event that the Site owner sells, leases, or grants any real estate interest affecting a portion of the Site, the Site Owner shall continue to be bound by all the terms and conditions of this Approval, unless EPA allocates some or all of this Approval's responsibilities to the new owner(s), lessee or grantee. The notification procedures are as follows:

    a. The new owner(s), lessee or grantee must request, in writing, that the EPA transfer some or all obligations and responsibilities under the Approval to the new owner(s), lessee or grantee;

    b. The EPA reviews the request, and determines whether to allocate some or all of the obligations and responsibilities under the Approval to the new owner(s), lessee, or grantee; and,

    c. The new owner(s), lessee or grantee provides written notification to the EPA of its acceptance of and intention to comply with the terms and conditions of the Approval or new approval, should EPA deem a new approval is necessary. The Approval or new approval may be withdrawn if the EPA does not receive written notification from the new owner(s), lessee or grantee of its acceptance of, and intention to comply with, the terms and conditions of the Approval or new approval within thirty (30) days of its receipt of the Approval or the new approval. Under such circumstances, all terms and conditions of this Approval will continue to be binding on the Site owner.

17. In the event that the sale, lease or grant of a real estate interest in the Site will involve or result in a change in the use of the Site, EPA may revoke, suspend, and/or modify this Approval or the new approval if it finds, due to the change in use, that this cleanup and disposal action will not be protective of health or the environment. The new owner or grantee shall record any amendment to the deed restriction, resulting from any approved modification(s), within sixty (60) days of such change(s).

18. In any sale, lease or grant of a real estate interest in the Site, the Site owner shall retain sufficient access rights to enable it to continue to meet its obligations under this Approval, except as provided above.

19. In the event that Fairfield sells, leases, or transfers any portion of the school where the waterproofing felt remains in-place, Fairfield and/or the new owner shall be required to develop a plan to address the waterproofing felt in accordance with 40 CFR § 761.61 and § 761.62.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

20. Within sixty (60) days of receipt of this Approval, Fairfield shall submit for EPA review and approval, and thereafter implement, a long-term MMP for indoor air and for encapsulated surfaces that includes the following:

    a. a description of the indoor sampling activities that will be conducted, including sampling protocols, sampling frequency, and analytical criteria and, reporting requirements.

    b. a communications component which details how the monitoring results will be communicated to the school users, other on-site workers, and interested stakeholders.

    c. submission of monitoring results to EPA. Based on its review of the monitoring results, EPA may determine that modification to the MMP is necessary in order to monitor and/or evaluate the long-term effectiveness of the coatings and/or other barriers.

    d. continuation of activities required under the MMP until EPA determines, in writing, that such activities are no longer necessary.

21. Any modification(s) in the plan, specifications, or information submitted by Fairfield, contained in the Notification, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. No action may be taken to implement any such modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification. If such modification involves a change in the use of the school which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this cleanup and risk-based disposal approval may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from Fairfield to make a determination regarding potential risk.

22. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

23. Any misrepresentation or omission of any material fact in the Notification or in any future records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

24. Approval for these activities may be revoked, modified or otherwise altered: if EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; if EPA finds that these activities pose an unreasonable risk of injury to health or the environment; or if EPA finds that changes are necessary to comply with new rules, standards, or guidance. Fairfield may apply for appropriate modifications in the event new rules, standards, or guidance comes into effect.

25. Fairfield shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by Fairfield to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

RECORDKEEPING AND REPORTING CONDITIONS

26. Fairfield shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup measures and the analytical sampling shall be established and maintained by Fairfield in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.

27. Fairfield shall submit a Final Completion Report ("Report") to the EPA within 120 days of completion of the activities described in the Notification and authorized under this Approval. At a minimum, the Report shall include: a discussion of the project activities; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCBs removed and disposed off-site; copies of manifests; and, copies of certificates of disposal or similar certifications issued by the disposer, if applicable. The Report shall also include a copy of the recorded deed restriction and a certification signed by a Fairfield official verifying that the authorized activities have been implemented in accordance with this Approval and the Notification.

28. As required under Condition 20 of this Approval, Fairfield shall submit the results of the long-term monitoring and maintenance activities to EPA as specified in the final MMP to be approved by EPA.

29. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

30. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

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END OF ATTACHMENT 1

Attachment 2.

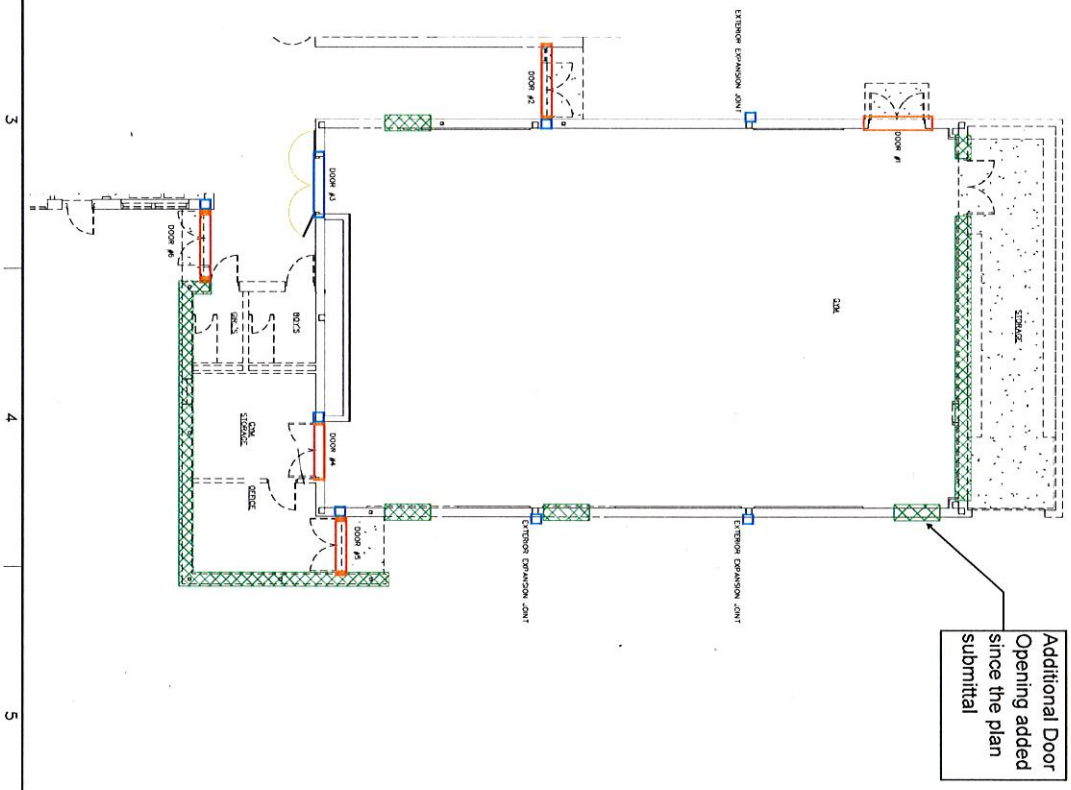
Gymnasium Doors Building Materials
PCB Remediation Plan Summary - Riverfield Elementary School

Door	Left Vertical		Right Vertical		Upper Horizontal		Verification Sampling Summary	
	Interior Wall	Exterior Wall	Interior Wall	Exterior Wall	Interior Wall	Exterior Wall	Vertical Joints	Upper Horizontal Joints
1	CMU - to be removed	Brick - to be removed	CMU - to be removed	Brick - to be removed	CMU - to be removed	Brick - to be removed	2 interior CMU 2 exterior brick	1 header
2	Brick - to be removed	Brick - to be removed	Brick - to be encapsulated	Brick - to be encapsulated	CMU - to be removed	CMU - to be removed	2 interior brick 2 exterior brick	1 header
3	CMU - to be encapsulated	Brick - to be encapsulated	CMU - to be encapsulated	Brick - to be encapsulated	CMU - to be encapsulated	Brick - to be encapsulated	2 interior CMU 2 exterior brick	1 header
4	CMU - to be encapsulated	Brick - to be encapsulated	CMU - to be removed	Brick - to be removed	CMU - to be removed	Brick - to be removed	2 interior CMU 2 exterior brick	1 header
5	Brick - to be encapsulated	Brick - to be encapsulated	Brick - to be removed	Brick - to be removed	CMU - to be removed	CMU - to be removed	1 interior brick 1 exterior brick	1 header
6	Brick - to be encapsulated	Brick - to be encapsulated	Brick - to be removed	Brick - to be removed	CMU - to be removed	CMU - to be removed	1 interior brick 1 exterior brick	1 header
					Total Number of Samples		20	6

Expansion Joint	Left Vertical	Right Vertical	Upper Horizontal	Verification Sampling Summary
South (1)	Direct contact and brick away from the joint to be encapsulated	Direct contact and brick away from the joint to be encapsulated	Not Applicable	2 exterior brick (2 per joint)
Northwest (1)	Direct contact and brick away from the joint to be encapsulated	Direct contact and brick away from the joint to be encapsulated	Not Applicable	2 exterior brick (2 per joint)
Northeast (1)	Direct contact and brick away from the joint to be encapsulated	Partial brick to be removed at door opening; remaining to be encapsulated	Not Applicable	2 exterior brick (2 per joint)
			Total Number of Samples	6

Notes:
1. Left and Right vertical based on left and right sides of individual doors except for Door #1 where the right is on the top of the page and the left is on the bottom of the page as shown on the plan view of revised Figure 5-1.
2. Interior walls of doors considered to be on the inside of the gymnasium for Doors 1, 3, and 4 and on the inside of the building for Doors 2, 5, and 6 (exterior is opposite).
3. Material removal to be conducted to a distance of 8 lateral inches from interior and exterior caulked joints at locations described above. Extent of removal as PCB waste to be based on results of verification sampling.
4. Encapsulation to be conducted to a distance of 8 lateral inches from interior and exterior caulked joints at locations described above. Extent of encapsulation to be based on results of verification sampling.
5. Verification samples to be collected at a distance of 8 lateral inches from interior and exterior caulked joints to determine waste segregation cut line or extent of required encapsulation. Locations of samples along joints to be determined using a random number generator based on the length of the individual joint. Samples to be collected as follows:
Vertical Joints - 2 samples to be collected from interior wall and 2 samples to be collected from exterior wall of each door for an approximate sampling frequency of 1 sample per 8 l.f. of caulked joint (Note: verification samples not to be collected along right vertical joints at Doors 5 and 6 locations where doors are in direct contact with portion of exterior wall to be removed for disposal as $\geq$ 50 ppm PCB waste)
Upper Horizontal Joints - 1 sample to be collected from either the interior or the exterior wall of each door for an approximate sample frequency of 1 sample per 12 l.f. of caulked joint. Wall to be randomly selected.

Attachment 3.



Additional Door Opening added since the plan submittal

LEGEND:

AREA OF PCB IMPACTED BUILDING MATERIAL REMOVAL

AREA OF PCB-IMPACTED BUILDING MATERIAL IMPLACE MANAGEMENT

AREA OF GYMNASIUM WALL TO BE REMOVED (LOCATION OF WATERPROOFING FELT REMOVAL)

SOURCE: ORIGINAL DESIGN DRAWINGS BY KENNETH BORGSON ARCHITECTS DATED JANUARY 1, 2014 "FIRST FLOOR DEMOLITION PLAN"

FIGURE 5-1

RIVERFIELD ELEMENTARY SCHOOL RENOVATION
FAIRFIELD, CONNECTICUT

PCB REMEDIATION PLAN

≥ 50 ppm PCB
REMEDIATION AREAS
1971 GYMNASIUM AREA

JOB NO. 227361
DATE: DECEMBER 2013
SCALE: NOT TO SCALE
SHEET: OF

REV	DESCRIPTION	DATE
DESIGNED BY: GJF	CHECKED BY: GJF	
DRAWN BY: PFT/EVR	227361-FIG 2-1_2-3_5-1.DWG	

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22x34 SHEET 1:2