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May 16, 2014
Revised: July 11, 2014

Apurva Patil, P.E.
Remedial Project Manager
Remediation & Site Response Program
Toxic Substances Division
District Department of the Environment
1200 First Street, NE, 5th Floor
Washington, DC 20002

Subject: ***Remedial Investigation and Feasibility Study Work Plan Addendum #2 – Cooling Tower Concrete Basins Soil Sampling Activities; Benning Road Facility, 3400 Benning Road, NE, Washington, DC***

Dear Ms. Patil:

AECOM has prepared this Addendum #2 to the Benning Road Facility Remedial Investigation and Feasibility Study (RI/FS) Work Plan to describe the proposed soil sampling activities in the vicinity of the two cooling tower basins at the Benning Power Plant. Potomac Electric Power Company (Pepco) and its affiliate, Pepco Energy Services, Inc. (PES), retained AECOM to develop this Addendum. The Benning Power Plant is located in the western part of the Benning Road facility located at 3400 Benning Road NE, Washington, DC. Pepco owned and operated the power plant from 1906 to 2000. PES acquired the power plant from Pepco in 2000 and ceased power plant operations in June 2012. Pepco and PES are in the process of decommissioning and demolishing the power plant, which occupies less than 20% of the total footprint of the Benning Road facility. The remaining portion of the facility is operated by Pepco as a service center and will remain in operation. A facility map showing the location of the cooling towers is provided in **Figure 1**.

The two cooling towers were constructed in 1969 or 1970. The cooling tower superstructures were demolished and removed in late 2013; only the concrete basins now remain in place. As discussed below, sampling of caulking in cooling tower basin expansion joints in 1995 and 2012 determined that the caulking contains greater than 50 parts per million (ppm) polychlorinated biphenyls (PCBs). When the cooling tower basins are demolished the caulking and other cooling tower basin materials will be managed and disposed of together as PCB *Bulk Product Waste* in accordance with EPA's Toxic Substances Control Act (TSCA) regulations, 40 CFR 761.61. A Self Implementing Remediation Plan (SIP) for the cooling tower concrete basins was prepared in accordance with 40 CFR 761.61(a), and submitted to the USEPA in April 2014. EPA approved the SIP on May 2, 2014. The SIP summarizes previous caulk, soil and concrete sampling data and presents the proposed remediation plan for the concrete basins. The remediation will entail the complete removal of the concrete basins and caulk, and disposal at an approved off-site facility in accordance with the SIP.

Limited soil sampling conducted in 2012 and 2013 indicated that the soil adjacent to the basins contains <50 ppm PCBs, and thus is not subject to the management requirements under the TSCA regulations. Pepco and PES therefore propose to conduct sampling of the soil adjacent to the basins as part of the Benning Facility RI/FS. Soil sampling activities proposed in this Addendum will focus on the area beneath and directly adjacent to the concrete basins to delineate PCBs impacts in soil. The PCBs in soil are believed to result from migration of PCB-containing caulking present in the basin expansion joints. The soil sampling will be conducted before the basins are removed in order to limit the period the subsoil is exposed to the atmospheric elements and to be protective of human health and the environment. The soil sampling data will be evaluated to determine if additional action is needed to address the soil beneath and around the cooling tower concrete basins. If the evaluation determines that a soil removal action is needed, Pepco and PES will prepare a supplemental plan for soil remediation to be

implemented at the same time as the concrete basin remediation to allow the resulting excavation to be backfilled immediately.

Project Background and Historical Remediation and Sampling Events

The two cooling tower basins (units 15 and 16) are each approximately 307 ft. by 57 ft, and were constructed in 1969 or 1970, when PCBs were widely added to sealants, caulks and many industrial products. Each of the unit 15 and 16 basins has four horizontal expansion joints running north to south along the basin floors (57 ft long) and eight vertical expansion joints in the basin walls (approximately 7 ft tall with their bases approximately 2 ft. below grade). Unit 16 has an additional 24 vertical expansion joints in the basin walls, for a total of 32 vertical expansion joints. **Figure 2** and **Figure 3** depict the distribution of floor and wall expansion joints in units 15 and 16, respectively. The caulk in the expansion joints is believed to be the source of PCBs that have been detected in soil.

In 1995, Pepco found PCBs in caulk samples at levels ranging from 3,300 to 57,655 ppm. At that time, Pepco conducted a cleanup of the area where the PCB-containing caulk and joint filler were found to be impacting the concrete basins, as well as sludge and water in the cooling tower basins, and soil adjacent to the basin wall expansion joints. According to the cleanup reports submitted to USEPA, Pepco sampled, excavated, and replaced soil adjacent to the wall expansion joints around both cooling tower basins as part of the cleanup. An area approximately 1 ft by 1 ft by 3 ft deep adjacent to each wall expansion joint was excavated and restored with clean backfill. The highest levels of PCBs in the excavated soils from units 15 and 16 were 30 ppm and 975 ppm, respectively. In addition to the adjacent subsurface soil samples, surface soil samples were collected at distances of 1 to 2 ft from the basin walls at a depth of 0.5-1 inch below grade. PCBs in these non-excavated surface soils ranged from <1 ppm to 3 ppm.

In January 2012, PES retained AECOM to perform an existing conditions/hazardous materials assessment for the two cooling tower basins. A total of ten soil samples (SS-1 through SS-10) were collected by hand auger from a depth of <1 ft below grade at various locations around the perimeters of the cooling towers. PCB results ranged from <0.1 ppm to 3.3 ppm. The locations of the 2012 soil samples are presented in **Figure 2** and **Figure 3**, and the analytical results are provided in **Table 1**.

In July 2013, AECOM collected additional soil samples as part of the SIP development. Two locations adjacent to the vertical expansion joints were sampled at two depths (0-3" and 3-6" below grade) at each basin, for a total of eight samples. PCB results for these samples ranged from <0.1 ppm to 10.0 ppm. The locations of the 2013 soil samples are presented in **Figure 2** and **Figure 3**, and the analytical results are provided in **Table 1.**

The results of the 2012 and 2013 sampling events at the basins indicated that low levels of PCBs are present in soils adjacent to the basin walls. PCBs were detected in 17 of 18 soil samples and 11 of the 18 samples contained <1 ppm PCBs. Seven samples contained PCBs >1 ppm, ranging from 1.15 to 10 ppm. Based on the 2012 and 2013 sampling data, it appears that PCBs from the caulk in the expansion joints may have recontaminated clean soil that was backfilled following the 1995 PCB cleanup.

No cooling tower basin sub-slab soil sampling has been conducted to date. AECOM conducted pilot coring on May 2, 2014 at one location in each basin on one of the floor joints to verify the thickness of the concrete floor. The floor thickness in each basin at the cored locations was determined to be 18 inches, consistent with the historical construction drawings. The concrete floor in Unit 15 is underlain by sand/silt and the floor in Unit 16 is underlain by gravel, crushed rock, and soil mixture. Pepco is proposing to sample cooling tower basin sub-slab soil sampling through cored holes (similar to the pilot cores) prior to the removal of the concrete basins. The results of this sub-slab soil sampling will be evaluated to determine whether any soil remediation is warranted, and if so, a remediation plan will be developed for DDOE approval in advance of the basin removal work under the SIP so that any such remediation can proceed immediately after the basins are removed.

Field Sampling Plan

The purpose of the proposed sampling is to characterize the horizontal and vertical extent of PCB contamination in soils beneath and around the concrete basins. It is expected that any PCB impacts to soil would be the result of migration from caulk along the expansion joints, not from a discrete release point. PCB impacts would be expected to be similar along all the expansion joints and would be expected to migrate to the same extent away from the joints, both vertically and horizontally. Further, the maximum horizontal and vertical extent of PCB concentrations detected at the horizontal and vertical expansion joints at each cooling tower basin will be applied uniformly to all of the horizontal and vertical expansion joints, respectively, in order to determine the extent of soil removal action at each cooling tower basin. Based on this conceptual site model and proposed remediation methodology, the number and distribution of proposed samples is considered sufficient to characterize any soil contamination associated with the basins.

The proposed sampling plan calls for collecting soil samples from both beneath (sub-slab locations) and around the cooling tower concrete basins (exterior locations). Utility clearance will be performed to identify and mark any utilities located beneath or around the cooling tower concrete basins prior to sampling. A total of 83 locations are proposed to be sampled at various depths, by hand auger or direct push drilling methods. The sample locations for units 15 and 16 are shown in **Figure 2** and **Figure 3**, respectively. The proposed sampling targets the soils adjacent to and below the vertical and horizontal expansion joints, where PCB contamination is expected to be greatest. Sub-slab soils not adjacent to the expansion joints, where PCBs are not expected to be found, are also proposed to be sampled. The approximately 18 inch thick concrete overlying the sub-slab sampling locations will be cored using a mechanized coring device prior to drilling. Sample locations may be modified in the field based on accessibility and safety considerations.

Sub-slab soil samples will be collected through the horizontal expansion joints at two locations along each expansion joint for a total of eight (8) sub-slab soil samples taken along the horizontal expansion joints in each cooling tower basin. Eight additional sub-slab soil samples will be collected at five feet from each expansion joint sub-slab soil sample (**Figure 2 and 3**). The sub-slab soil samples will be located twenty feet from the basin walls, and at depths of zero, one, and 2 feet below the bottom of the slab. Soil samples outside the cooling tower basins ("Exterior Samples") will be collected from directly adjacent to the vertical expansion joint, five feet from the joint, and ten feet from the joint. The bottom of the basin foundations extend approximately three feet below grade. Exterior Samples will be collected at 3 feet above the level of the foundation bottom (afb), 2 ft. afb, 1 ft. afb and 0 ft. afb. Exterior Samples will also be collected from one and two feet below the level of the foundation bottom, so that the deepest exterior soil samples will be collected from the same depth as the deepest sub-slab samples. This sampling scheme is depicted in **Figure 4**.

A total of 384 field samples from the 83 locations are proposed. The samples will consist of primary and contingency samples, with the primary samples being those closest to the basins, or at the ground surface. Sub-slab primary samples will be only those collected along the horizontal expansion joints and immediately below the bottom of the slabs. Exterior primary samples will be those collected immediately adjacent to the basin walls (at 0, 1, 2, and 3 ft below grade), and those collected from the surface at 5 feet and 10 feet from the wall. All other samples will be contingency samples, to be put on hold pending the results of the primary samples. A diagram of this sampling scheme is presented in **Figure 4**, and the number and type of proposed soil samples for each basin is provided in **Table 2**.

If any of the deepest samples (either sub-slab or exterior) contains >1 ppm PCBs, an additional sampling phase may be necessary to delineate the full depth of elevated soil concentrations. If any exterior sample collected at 10 ft. from the basin exhibits PCBs at a higher concentration than the samples at 0 and 5 ft. from the basin at that location and the source of PCBs is not readily attributable to the caulk in the expansion joints, Pepco will evaluate the need for additional chemical analysis using PCB congeners to determine the PCB source.

A total of 112 primary samples are proposed, which will be analyzed to determine the extent of PCB contamination in soils beneath the basins, directly adjacent to the basins, and in surface soils up to 10 ft away from the basins. The remaining 272 samples are contingency samples, to be put on hold pending the results of the primary samples. All samples will be submitted to and stored at the lab before analysis. If PCBs are detected in a primary sample at >1.0 ppm, then any contingency samples below or adjacent to that sample location will be analyzed. (The 1.0 ppm threshold corresponds to the high occupancy/no further restrictions cleanup level for PCBs per 40 CFR 761.61(a)(4).) The same procedure will be applied if PCBs are detected in a contingency sample at >1.0 ppm: any other contingency samples below or adjacent to it will then be analyzed.

Per 40 CFR 761.286, the sampling interval will be less than 7.5 centimeters (approximately 3”), and will be collected from the top of the 1-foot target interval. Samples will be placed in a 4-ounce glass sample jar and stored on ice while in the field and during transportation to the laboratory.

The soil sample identification will include “CT15” or “CT16” for the basin number, “SO” for soil, a sequential number for the sample location (starting at SO3), a letter to indicate whether the sample was collected at zero, five, or ten feet from a expansion joint (A, B, or C, respectively; sub-slab floor center samples will have no letter), and sample depth (0, 12, 24, 36, 48, or 60 inches). An example sample ID is CT15SO3B-24.

Sampling equipment, tools, and machinery that contact PCB materials will be decontaminated between sample collection and prior to leaving the site. Decontamination will be done using the procedures as defined in §761.79(c)(2). Specifically, equipment, tools and machinery that are visually clean will be swabbed with solvent solution containing d-limonene (Zepp and Citri-Clean are acceptable solvent cleaners). Grimy non-porous surfaces will be decontaminated following the double wash/rinse procedures specified in §761.375 and as described in the “Wipe Sampling and Double Wash/Double Rinse Cleanup as recommended by the EPA PCB Spill Cleanup Policy” (June 1987, revised April 1991). This decontamination procedure calls for a detergent wash (i.e., Alconox), water rinse, solvent wash followed by wiping the surface dry. Decontamination solids and liquids will be drummed and tested for appropriate disposal, per **POP 106 Investigative Derived Waste Management**, provided in the Field Sampling Plan (FSP) developed for the RI/FS.

Upon completing the soil sampling, all borings, both interior and exterior, will be abandoned by backfilling with bentonite grout, and finished with existing surface cover material (sand or concrete).

Analytical Methods

All PCB samples will be extracted according to SW-846 Method 3550B (sonication) and analyzed according to SW-846 Method 8082A. Based on the cleanup standard for PCBs in soil of 1.0 mg/kg, the reporting limit (RL) for total PCBs will be a minimum of three times below that standard. The nominal reporting detection limit for each Aroclor will be less than 0.33 mg/kg for all solid matrices unless dilutions are required due to PCB detection.

The required laboratory turn-around-time for reporting will be 5 business days from receipt of samples. All sample concentrations will be reported on a dry weight basis in accordance with §761.274. The laboratory deliverables will include a Level 2 PDF report consisting of sample results and batch Quality Control (QC) result information, and an EQuIS 4-file format EDD compliant with the AECOM specifications and checked by EDP. A Level 4 data package including all CLP-forms and raw data will also be required within 21 calendar days from receipt of sample.

All samples that are collected will be accompanied by a COC record. Sample information will be documented on the COC record as soon as is practical after sample collection. All containers used to ship or transport samples (e.g., coolers) will be sealed with custody seals after packaging. All chain-of-custody procedures will be in accordance with **POP 102 Chain-of-Custody Procedures**, provided in the Field Sampling Plan (FSP) developed for the RI/FS.

The following information will be documented on the COC record at minimum:

- Project name and number,
- Initials of sampler,
- The sample identification, date and time collected, and sample type,
- Analysis requested,
- The identification of contingency samples, to be put on hold pending the results of the primary samples,
- Preservative (none needed for PCBs other than storing on ice),
- Any special instructions and/or sample hazards, and
- Signature of sampler in the designated fields, including date and time.

Samples will be packaged properly for shipment and dispatched to the laboratory for analysis with a separate signed COC record enclosed in each sample cooler. Shipping containers will be sealed using fiberglass strapping tape. Custody seals will be adhered to the coolers, with one custody seal on the back of the cooler and one on the front of the cooler. Clear plastic packing tape will be used to seal the custody seal to the cooler.

All sample packaging and shipping procedures will be in accordance with **POP 103 Packaging and Shipment of Environmental Samples**, provided in the Field Sampling Plan (FSP) developed for the Remedial Investigation and Feasibility Study.

Laboratory quality control procedures will be performed in accordance with the requirement in SW-846 Method 8082A, WSC Polychlorinated Biphenyls (PCBs) by Gas Chromatography, and the Laboratory Quality Assurance Plan (LQAP). At a minimum, the QC procedures will include method blanks, laboratory control samples (LCSs), MS/MSDs, and surrogates. A holding time of one year will be applied to the analysis of PCBs in collected soil samples per EPA Method 8082A and Chapter Four of SW-846, Rev.4.

Field QC procedures will include proper sample preservation and the collection of field duplicates at a frequency of one per twenty field samples. Soil samples designated for matrix spiking (one per twenty field samples) will be indicated on the COC. Additional sample volume is not required for the MS/MSD if the sample jars are at least half full. Equipment blank samples will be collected at a frequency of one per 20 samples, and at least one per day, in accordance with the RI/FS Work Plan.

Documentation of field conditions and observations will be done in accordance with **POP 101, Field Records**, which is provided in the Field Sampling Plan (FSP) developed for the RI/FS.

Schedule and Reporting

The sampling event will begin upon DDOE's approval of this Addendum #2 and prior to the cooling tower concrete basin remediation under the SIP. The results of the sub-slab soil sampling will be reported to DDOE along with a proposed remediation plan, if warranted. In addition, a discussion of the basin soil sampling activities and results, and any associated soil remediation, will be included in the draft RI Report.

If you have any questions or comments concerning this RI/FS Addendum #2, please contact Fariba Mahvi of Pepco at (202) 331-6641 or Ravi Damera of AECOM at (240) 565-6510.

Sincerely,

Ben Daniels
Staff Geologist

Ravi Damera, P.E., BCEE
Senior Project Manager

Gary Grinstead, P.G.
Operations Manager

cc: Ms. Fariba Mahvi, Pepco

Attachments:
Tables 1 and 2
Figures 1 through 4

Table 1 - PCB Soil Analytical Results
RI/FS Work Plan Addendum #2
Pepco Benning Road Site

Sample ID	Date Collected	Aroclor-1016	Aroclor-1221	Aroclor-1232	Aroclor-1242	Aroclor-1248	Aroclor-1254	Aroclor-1260	Aroclor-1262	Aroclor-1268	PCB, Total Aroclors
Cooling Tower 15											
SS-6	1/12/2012	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	0.2	< 0.1	< 0.066	< 0.066	0.2
SS-7	1/12/2012	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	0.4	< 0.1	< 0.066	< 0.066	0.4
SS-8	1/12/2012	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	3.3	< 0.1	< 0.066	< 0.066	3.3
SS-9	1/12/2012	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	0.2	< 0.1	< 0.066	< 0.066	0.2
SS-10	1/12/2012	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	0.2	< 0.1	< 0.066	< 0.066	0.2
CT15SO1-03	7/9/2013	< 0.28 U	< 0.28 U	< 0.28 U	< 0.28 U	< 0.28 U	2.8	< 0.28 U	< 0.28 U	< 0.28 U	2.8
CT15SO1-06	7/9/2013	< 0.27 U	< 0.27 U	< 0.27 U	< 0.27 U	< 0.27 U	3.6	< 0.27 U	< 0.27 U	< 0.27 U	3.6
CT15SO2-03	7/10/2013	< 0.28 U	< 0.28 U	< 0.28 U	< 0.28 U	< 0.28 U	10	< 0.28 U	< 0.28 U	< 0.28 U	10
CT15SO2-06	7/10/2013	< 0.50 U	< 0.50 U	< 0.50 U	< 0.50 U	< 0.50 U	3.7	< 0.50 U	< 0.50 U	< 0.50 U	3.7
Cooling Tower 16											
SS-1	1/12/2012	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	0.2	< 0.066	< 0.066	0.2
SS-2	1/12/2012	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	0.3	< 0.066	< 0.066	0.3
SS-3	1/12/2012	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	0.1	< 0.066	< 0.066	0.1
SS-4	1/12/2012	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	1.4	< 0.066	< 0.066	1.4
SS-5	1/12/2012	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.066	< 0.066	< 0.1
CT16SO1-03	7/12/2013	< 0.29 U	< 0.29 U	< 0.29 U	0.11 J	< 0.29 U	0.60 J	0.44 J	< 0.29 U	< 0.29 U	1.15
CT16SO1-06	7/12/2013	< 0.26 U	< 0.26 U	< 0.26 U	0.15 J	< 0.26 U	0.44 J	0.12 J	< 0.26 U	< 0.26 U	0.71
CT16SO2-03	7/12/2013	< 0.25 U	< 0.25 U	< 0.25 U	< 0.25 U	< 0.25 U	0.41	< 0.25 U	< 0.25 U	< 0.25 U	0.41
CT16SO2-06	7/12/2013	< 0.24 U	< 0.24 U	< 0.24 U	< 0.24 U	< 0.24 U	0.29	< 0.24 U	< 0.24 U	< 0.24 U	0.29

Notes:

All results are reported in mg/kg

PCB - Polychlorinated Biphenyl

U - Not detected above the reporting limit

J - Estimated value. The analyte was detected but the numeric value is an approximation.

Results in bold indicate a detection above the laboratory detection limit

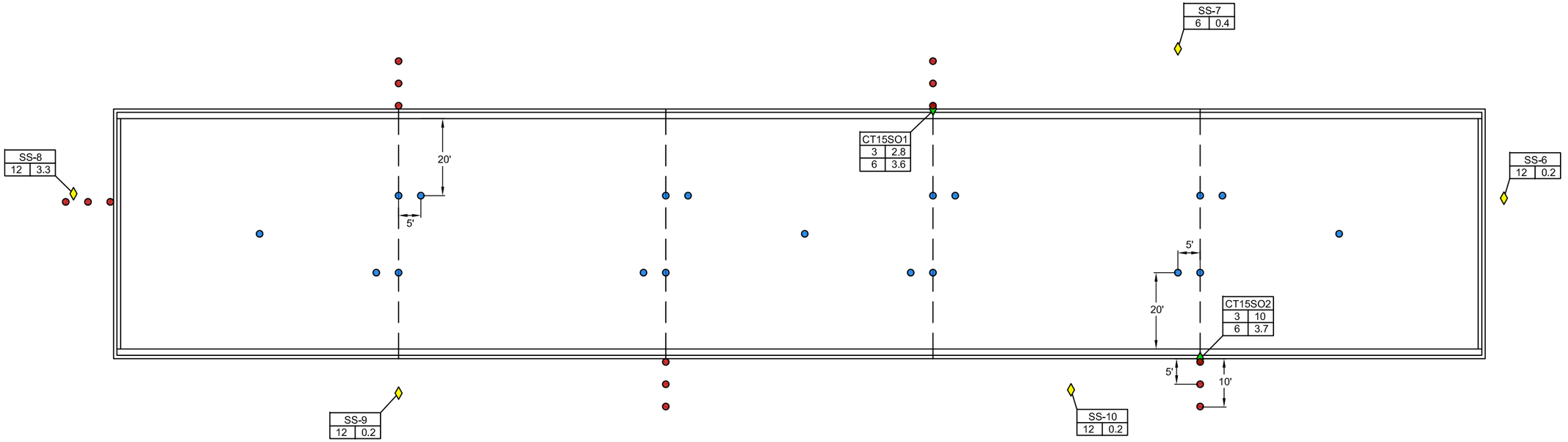
Table 2 - Proposed Samples
RI/FS Work Plan Addendum #2
Pepco Benning Road Site

Location	Sampling Scheme	Number of Samples	Number of Primary Samples	Number of Contingency Samples
Cooling Tower 15				
Sub-Slab Samples				
Floor Seam	Four seams, sampled at two locations, at two distances from each seam (0' and 5') and three depths (0', 1', and 2')	4 x 2 x 2 x 3 = 48	8	40
Floor Center	Three centers, sampled at three depths (0', 1', and 2')	3 x 3 = 9	3	6
Exterior Samples				
Wall Seam	Four seams, sampled at three distances from each seam (0', 5', and 10') and six depths (0', 1', 2', 3', 4', and 5')	4 x 3 x 6 = 72	24	48
West Wall	One wall, sampled at three distances from the wall (0', 5', and 10') and six depths (0', 1', 2', 3', 4', and 5')	1 x 3 x 6 = 18	6	12
	Total for Cooling Tower 15	147	41	106
Cooling Tower 16				
Sub-Slab Samples				
Floor Seam	Four seams, sampled at two distances from each seam (0' and 5') and three depths (0', 1', and 2')	4 x 2 x 2 x 3 = 48	8	40
Floor Center	Three centers, sampled at three depths (0', 1', and 2')	3 x 3 = 9	3	6
Exterior Samples				
Wall Seam	Ten seams, sampled at three distances from each seam (0', 5', and 10') and six depths (0', 1', 2', 3', 4', and 5')	10 x 3 x 6 = 180	60	120
	Total for Cooling Tower 16	237	71	166
	Grand Total	384	112	272

Notes:

Sub-slab primary samples will be those collected at expansion joints and immediately below the slab.
Exterior primary samples will be those collected immediately adjacent to the basin wall (at 0, 1, 2, and 3 ft below grade), and from the surface at 5 feet and 10 feet from the wall.
All other samples will be contingency samples, to be put on hold and analyzed only if an adjacent primary sample contains >1 ppm PCBs.
Greater number of samples in Cooling Tower 16 is due to the greater number of vertical expansion joints in that basin.

	Site Map **Benning Road Facility** 3400 Benning Road NE, Washington, D.C.	**Potomac Electric Power Company (Pepco)** **and** **Pepco Energy Services (PES)** July 2014	AECOM **Figure 1** www.aecom.com



COOLING TOWER 15 - PLAN VIEW

SCALE: 1" = 25'

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LEGEND:

- EXPANSION JOINT
- SUB-SLAB PROPOSED SAMPLING LOCATION
- EXTERIOR PROPOSED SAMPLING LOCATION
- 2012 SAMPLING LOCATION
- 2013 SAMPLING LOCATION
- PCBs POLYCHLORINATED BIPHENYLS
- mg/kg MILLIGRAMS PER KILOGRAM

DATA BOX KEY:

SAMPLE ID	
DEPTH BELOW GRADE (inches)	TOTAL PCBs (mg/kg)

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Remedial Investigation and Feasibility Study Work Plan Addendum #2

COOLING TOWER BASINS
BENNING ROAD FACILITY
WASHINGTON, DC

PREPARED FOR

PEPCO ENERGY SERVICES
BENNING ROAD FACILITY
3400 BENNING ROAD, NE
WASHINGTON, DC 20019

PREPARED BY

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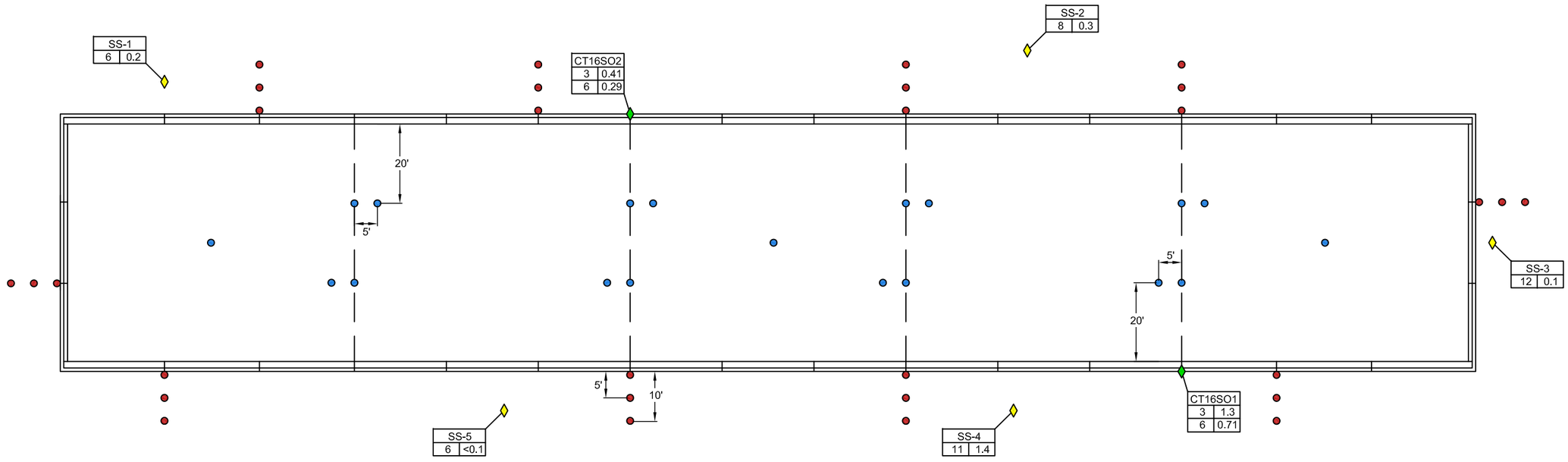
DATE
06.09.2014

PROJECT NUMBER
60287343

FIGURE TITLE
Cooling Tower 15
Historic and Proposed
Sampling Locations

FIGURE NUMBER
2

Project Management Initials: Designer:____ Checked:____ Approved:____
Last saved by: CAMPBELLC (2014-06-03) Last Plotted: 2014-06-09
Filename: Z:\CAD\PROJECTS\PEPCO\2014\WASHINGTON, DC\BENNING ROAD FACILITY\HISTORIC & PROPOSED SOIL SAMPLING_60287343.07\DWG\COOLING TOWER 15_FIGURE 2_HISTORIC & PROPOSED SAMPLE LOC_2014.DWG



COOLING TOWER 16 - PLAN VIEW
SCALE: 1" = 25'

LEGEND:

- EXPANSION JOINT
- SUB-SLAB PROPOSED SAMPLING LOCATION
- EXTERIOR PROPOSED SAMPLING LOCATION
- 2012 SAMPLING LOCATION
- 2013 SAMPLING LOCATION
- PCBs POLYCHLORINATED BIPHENYLS
- mg/kg MILLIGRAMS PER KILOGRAM

DATA BOX KEY:

SAMPLE ID	
DEPTH BELOW GRADE (inches)	TOTAL PCBs (mg/kg)

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PROJECT

Remedial Investigation and Feasibility Study Work Plan Addendum #2

COOLING TOWER BASINS
BENNING ROAD FACILITY
WASHINGTON, DC

PREPARED FOR

PEPCO ENERGY SERVICES
BENNING ROAD FACILITY
3400 BENNING ROAD, NE
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PREPARED BY

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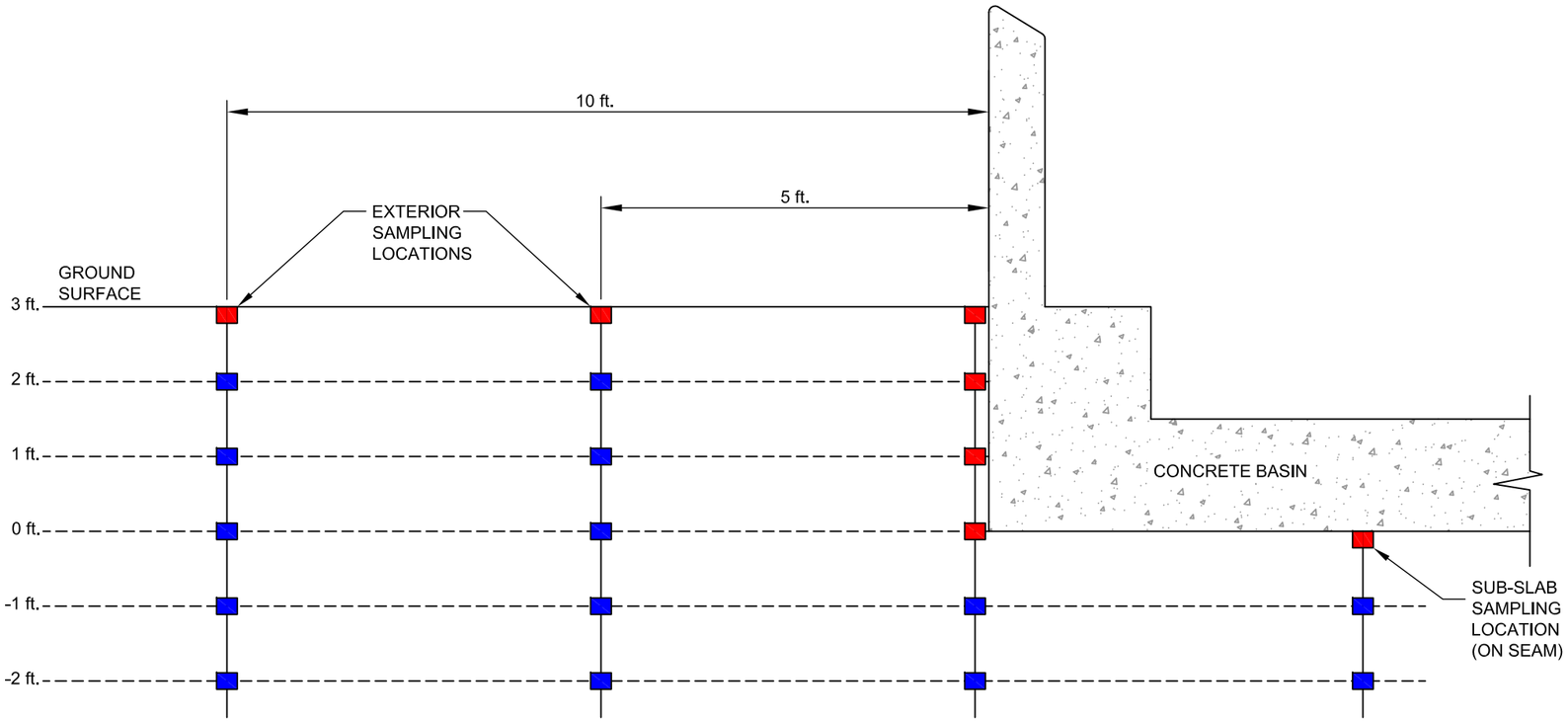
FIGURE TITLE
Cooling Tower 16
Historic and Proposed
Sampling Locations

FIGURE NUMBER
3

Project Management Initials: Designer:____ Checked:____ Approved:____
Last saved by: CAMPBELLC (2014-06-03) Last Plotted: 2014-06-09
Filename: Z:\CAD\PROJECTS\P\PEPCO\2014\WASHINGTON, DC\BENNING ROAD FACILITY\HISTORIC & PROPOSED SOIL SAMPLING_60287343.07\DWG\COOLING TOWER 16_FIGURE 3_HISTORIC & PROPOSED SAMPLE LOC_2014.DWG



SAMPLING LOCATIONS - PROFILE VIEW

SCALE: 1" = 2'

LEGEND:

- PRIMARY SAMPLE
- CONTINGENCY SAMPLE

NOTE: CONTINGENCY SAMPLES WILL BE PUT ON HOLD PENDING THE RESULTS OF THE PRIMARY SAMPLES. IF A PRIMARY SAMPLE IS >1 PPM PCBs THEN ANY CONTINGENCY SAMPLES BELOW OR ADJACENT TO IT WILL BE ANALYZED.

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Remedial Investigation and Feasibility Study Work Plan Addendum #2

COOLING TOWER BASINS
BENNING ROAD FACILITY
WASHINGTON, DC

PREPARED FOR

PEPCO ENERGY SERVICES
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DATE
06.09.2014

PROJECT NUMBER
60287343

FIGURE TITLE
Soil Sampling Scheme

FIGURE NUMBER
4

Project Management Initials: Designer:____ Checked:____ Approved:____

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Filename: Z:\CAD\PROJECTS\P\PEPCO\2014\WASHINGTON, DC\BENNING ROAD FACILITY\HISTORIC & PROPOSED SOIL SAMPLING_60287343.07\DWG\FIGURE 4_SOIL SAMPLING SCHEME_2014.DWG