

REMOVAL AND ABATEMENT PLAN

NEW BEDFORD HIGH SCHOOL BUILDING INTERIOR PCB REMOVAL & ABATEMENT PLAN



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1.0 INTRODUCTION

This Removal and Abatement Plan (RAP) for the remediation of Polychlorinated Biphenyl (PCB) Bulk Product Wastes and other building materials containing PCBs regulated under 40 CFR §761.61(a) and (c) has been prepared for the City of New Bedford (City) for the New Bedford High School (NBHS) located at 230 Hathaway Boulevard in New Bedford, Massachusetts. A site location map is provided as Figure 1.

Air sampling within the building indicates that PCB concentrations in air, have dropped significantly when compared to levels of regulatory concern following the duct cleaning, contaminated dust removal, and air handling system rebalancing that was completed between summer 2007 and February 2008. However, TRC has identified certain PCB-containing building materials at NBHS that trigger Federal regulations requiring their removal, as further detailed herein.

TRC has conducted a search for PCB-containing building materials at NBHS and some materials classified as PCB Bulk Product Wastes and PCB Remediation Wastes were removed during the summer break in 2009 (see Removal Action Report TRC February 2010 for additional details). The purpose of this RAP is to finalize the plan for removal and abatement of PCB-containing building materials in order to achieve compliance with applicable regulations. This RAP also prioritizes and outlines maintenance measures that will remove other PCB-containing building materials or reduce the potential for exposure to these materials.

This RAP identifies the PCB-containing building materials that require some type of action under applicable regulations and provides an overall schedule for when the City will address them. Since the work will take time to implement and opportunities to conduct the work are limited to substantial school vacation periods, the RAP by necessity defines criteria for prioritizing materials targeted for removal/abatement. There are also PCB-containing building materials that are not regulated with respect to the federal regulations. This RAP outlines how these materials will be managed to reduce the potential for direct exposure to PCBs and to reduce the overall PCB load within the building.

Subject to regulatory approval, the initial goals of this RAP are summarized below:

1. **Removal Activities.** Target the removal of additional regulated PCB-containing building materials with the highest PCB concentrations, which can be removed during the summer 2010 and 2011 vacation periods.
2. **Maintenance Measures.** Describe, prioritize, and outline a schedule for Maintenance Measures that can reduce the potential for direct exposure and the overall PCB load in the building over time.

With a building the size of NBHS, the removal and abatement can successfully proceed in phases that can accommodate the continued use of the building as an educational facility. Specifically, this RAP describes removal and abatement activities proposed for the school

summer vacations of 2010 and 2011 and outlines the anticipated path forward for future activities. A decision flow chart used to evaluate the order of removal/abatement activities is presented in Figure 2. As indicated above, TRC expects that this RAP will be subject to change/amendment over time as removal and abatement activities proceed and are refined to achieve the final goals. In addition, the implementation of Maintenance Measures outlined in this RAP is not necessarily constrained to school summer vacation periods.

Some PCB-containing building materials targeted for removal are suspected of also being asbestos containing material (ACM) and building materials near or in contact with the targeted PCB-containing building materials are also suspected of containing asbestos (e.g., floor tiles adjacent to Univent systems) and might be disturbed during removal and/or abatement activities. To support the preparation of specifications and public bidding documents for the proposed PCB-containing building material removal and/or abatement activities, TRC will collect a sufficient quantity of building material samples to evaluate asbestos content of the targeted and potentially impacted building materials to help define prospective remedial contractor qualifications, containment approaches (where needed), and disposal impacts, as well as related regulatory compliance issues. The results of these and other related evaluations will guide the preparation of bidding documents and specifications used in the municipal procurement process.

1.1 New Bedford High School Description

NBHS is an approximately 535,000 square foot (sq. ft.) building of principally concrete and masonry construction built during the late 1960s and early 1970s (completed in 1971). The building is capable of housing a maximum of 4,000 students, but current enrollment is approximately 3,300 students. The building is divided into six parts or “blocks” listed below along with a description of the use and/or occupancy of the block. A schematic layout of the building is provided as Figures 3 through 5.

- **A-Block:** The A-Block portion of the building is principally classroom and some office space. Hallways in the A-Block are also lined with lockers.
- **B-Block:** The B-Block portion of the building is also known as the “Core”. The B-Block is a mix of class room space, laboratories, and lecture halls. The B-Block is also the location the boiler rooms, kitchens, and dining hall spaces.
- **C-Block:** The C-Block is a transitional area that houses the main offices, a school store, and hallway space.
- **D-Block:** The D-Block houses a variety of activities including wood shops, auto shop, the main auditorium, a small theater, a rifle range, offices and some classroom space, as well as a large area located beneath the sloped auditorium floor for storage.
- **E-Block:** Boys and girls gymnasiums and locker rooms.
- **F-Block:** The swimming pool facility.

1.2 Sampling Description

Investigations conducted by TRC and others have documented the presence of PCBs in indoor air at NBHS at concentrations greater than United States Environmental Protection Agency (EPA) benchmarks described below as well as in building materials and dust (TRC, 2006a, 2008; BETA, 2006)¹. The following provides a timeline for previously conducted air, dust, and bulk material sampling within NBHS, subsequent remedial actions, and additional bulk material sampling performed to identify other potential source materials:

- Initial indoor air sampling performed by The BETA Group, Incorporated (BETA) in April 2006 found PCB concentrations in indoor air that exceeded the EPA Threshold for Further Investigation of 0.05 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) based on eight indoor air samples.
- A subsequent larger indoor air sampling effort undertaken by TRC in August 2006 found PCB concentrations in indoor air that exceeded the EPA Threshold for Further Investigation of 0.05 $\mu\text{g}/\text{m}^3$ and also one that exceeded the Acceptable Long-Term Average Exposure Concentration of 0.3 $\mu\text{g}/\text{m}^3$. The results are summarized below:
 - *Concentration Range:* 0.0024 $\mu\text{g}/\text{m}^3$ to 0.31 $\mu\text{g}/\text{m}^3$
 - *Results In Excess of EPA Threshold for Further Investigation (0.05 $\mu\text{g}/\text{m}^3$):* 11
 - *Results at or approaching Acceptable Long-Term Average Exposure Concentration (0.3 $\mu\text{g}/\text{m}^3$):* 2
 - *Room B-240* 0.31 $\mu\text{g}/\text{m}^3$
 - *Room A-114-3* 0.26 $\mu\text{g}/\text{m}^3$
- Sampling and analysis of dust within the duct work for the ventilation system, on building surfaces, and beneath lockers also conducted by TRC in August 2006 found PCB concentrations that could serve as a source for PCBs detected in indoor air at NBHS.
- TRC oversaw a remedial program performed in the summer of 2007 that removed the dust from various surfaces including the internal surfaces of duct work. Repairs to the ventilation system were also performed under the direction of NBHS engineering staff and City school officials and the heating, ventilation and air-conditioning (HVAC) system was rebalanced in January/February 2008.

¹ EPA's Action Level of 0.05 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) is considered a threshold for further evaluation. The risk-based Acceptable Long-Term Average Exposure Concentration is 0.3 $\mu\text{g}/\text{m}^3$ represents a long-term average concentration that corresponds to risk benchmarks established by the Massachusetts Department of Environmental Protection (MassDEP) assuming 25 years of daily workplace exposure. Short-term exposures at the EPA Action Level do not represent an immediate threat to health.

- Also during the summer of 2007 remedial program, TRC undertook supplemental diagnostic PCB source sampling that included additional bulk sampling in the two classrooms with the highest detected concentrations of indoor air PCBs in August 2006. This sampling was performed to clarify the relative contributions of potential PCB sources present at these locations and help evaluate appropriate remedial actions for PCB-containing building materials in other portions of the school.
- Indoor air sampling performed by TRC in February 2008 found PCB concentrations in indoor air had decreased beneath the Acceptable Long-Term Average Exposure Concentration of $0.3 \mu\text{g}/\text{m}^3$, but PCBs were still detected in indoor air and in some cases in excess of the EPA Threshold for Further Investigation of $0.05 \mu\text{g}/\text{m}^3$. Additional remedial measures to address PCB-containing building materials were deemed necessary because indoor air PCB concentrations still exceed the EPA Threshold for Further Investigation.
- TRC developed a source/sink sampling program to further characterize possible PCB-containing building materials at the site. This sampling program was based in part on a September 12, 2007 site reconnaissance of NBHS conducted with representatives of the City, EPA, and TRC and was implemented in two parts: a source/sink sampling program followed by quasi-random sampling program:
 - The source/sink sampling took place in July 2008 and included the following:
 - Quantification of PCB-containing building materials through site reconnaissance;
 - Sampling of building materials that are potential PCB source materials or PCB sinks;
 - Evaluation of the quantitative relationship between PCB concentrations in bulk materials and indoor air concentration (TRC, 2008);
 - The second phase of investigation was performed in December 2008 with sampling of additional bulk building materials on a quasi-random basis to complement previous sampling and to provide a general characterization of PCB-containing building materials in the building.
 - An additional round of sampling that focused on Univent interior panel coatings in the B-Block was performed in February 2009 following a site visit with representatives of EPA.

- A third phase of investigation was performed in August 2009 with targeted sampling of additional bulk building materials to complement previous sampling and to fill data gaps in the general characterization of PCB-containing building materials (TRC, 2009).
- Post-removal confirmatory wipe samples were collected at each target location immediately following the August 2009 removal actions, performed concurrently with the bulk building material sampling.
- Removal and abatement actions performed during the summer break 2009 included the removal of cabinets within rooms A-205-4, A-319-3, and B-240 which had laminate adhesive that was classified as PCB Bulk Product Wastes. Painted wallboard and all materials in contact with the paint were also removed from the closet in room A-206-4 as the paint was classified as PCB Bulk Product Waste. There was some additional removal of pads and furniture with polyurethane foam that was classified as PCB Remediation Wastes. As part of this program, ACM consisting of coated sinks and pipe insulation were also removed from the target areas (TRC, 2010). Locations where cabinetry was removed were secured on an interim basis until new cabinetry could be installed in December 2009.

1.3 Working Hypothesis

The current working hypothesis for the continued detection of air-phase concentrations of PCBs at NBHS is that numerous low concentration PCB-containing building materials serve as reservoir sources for the air phase PCBs detected at NBHS. Solid phase PCBs volatilize slowly into the vapor phase; therefore, higher concentrations in indoor air may be expected in locations where building material PCB concentrations are higher. Outdoor air does not appear to be a significant source of PCB found in indoor air since outdoor air samples collected in 2007 concurrently with indoor air samples were either non-detect for PCBs, or had measured concentrations significantly lower (by an order of magnitude or more in many cases) than the corresponding indoor air levels.

Initial indoor air sampling revealed PCB concentrations above EPA's Threshold for Further Investigation of 0.05 ug/m^3 and Acceptable Long-Term Average Exposure Concentration of $0.3 \text{ } \mu\text{g} / \text{m}^3$. The initial remedial action, summer 2007 vent cleaning, was the first step toward a systematic remediation of PCB sources in the building. The subsequent re-testing to evaluate remedial effectiveness documented in the February 2007 indoor air monitoring conducted by TRC highlights the success of the initial remedial effort to reduce indoor air PCB concentrations, but PCBs continue to be detected above the Threshold for Further Investigation of 0.05 ug/m^3 as noted in EPA's October 3, 2007 letter to the City.

EPA further noted in their October 3, 2007 letter to the City that a more comprehensive assessment of building materials is warranted in order to determine the extent of PCB

contamination in NBHS (EPA, 2007). The EPA-requested characterization work has been completed and this RAP represents the second step in the systematic remediation of the building. Following completion of the work described in this RAP, the status of NBHS will be reviewed relative to applicable regulations and evolving EPA guidance to evaluate if additional remedial measures are required.

1.4 Building Material Classifications

Building materials found to contain PCBs are classified into one of three regulatory categories listed below based on regulatory defined criteria discussed herein:

- PCB Bulk Product Wastes;
- PCB Remediation Wastes; or
- Excluded PCB Products.

Table 1 presents the total PCB concentrations for all of the NBHS building materials sampled by TRC and groups the analytical data by building material type (e.g., paint, laminate adhesive, etc). The table also lists the regulatory category for each material, which was determined by following the decision process presented in Figure 2.

PCB Bulk Product Wastes. Materials classified as PCB Bulk Product Wastes include all building materials where the source of PCBs is reasonably believed to be from original manufacture with a PCB concentration equal to or greater than 50 milligrams per kilogram (mg/kg). Based on TRC's evaluations, this category includes the following:

- Coatings found within certain univent systems;
- Certain laminate adhesives, and
- Wall paint in limited areas of the building.

Materials are also classified as PCB Bulk Product Wastes if subsequent construction or building maintenance procedures may have led to a dilution of the original PCB concentration. Where the dilution amount cannot be reasonably determined, then the materials were assumed to have originally contained PCBs at a concentration greater than 50 mg/kg consistent with 40 CFR 761.62. This category of material constitutes an unauthorized use of PCBs under 40 CFR 761.62 and must be removed from the NBHS building.

PCB Remediation Wastes. Building materials classified as PCB Remediation Wastes include all those where the source of the PCBs is the release from a source containing PCBs at a concentration greater than 50 mg/kg and not from manufacture. In the case of building materials, the release from the source would either be from direct contact with the material classified as a PCB Bulk Product Waste or from the deposition of airborne PCBs onto the material (e.g., via adsorption). Because the exact source of PCBs for each of the PCB Remediation Wastes cannot be determined it must be assumed that the source was greater than 50 mg/kg. Currently, this category includes the following:

- Polyurethane foams used in chairs or other pieces of furniture and gymnasium padding.

PCB Remediation Wastes must be removed, but data collected to date by TRC indicate that these materials typically have lower concentrations than the previously discussed PCB Bulk Product Wastes. Remedial actions associated with these materials will be prioritized as discussed herein.

Excluded PCB Products. The final category, Excluded PCB Products, includes all materials with a PCB concentration less than 50 mg/kg where the source is reasonably believed to be from manufacture and not from a release. In addition, these materials must be part of the original construction or be reasonably determined that subsequent construction or maintenance activities that could have led to the dilution of PCBs within the material. This category includes the following:

- Wall divider gaskets;
- Laminate adhesives and paint not determined to be PCB Bulk Product Wastes;
- Window caulking and glazing;
- Vinyl cove base
- Joint sealants;
- Carpets and padding;
- Push-pin materials;
- Mastics (e.g., floor tile and cove base molding); and
- Other building materials (e.g., wallboard, tile, concrete, roofing materials, and insulation).

EPA regulations do not require removals and/or clean-up of Excluded PCB Products as they do with the previously discussed PCB Bulk Product and Remediation Waste categories. However, Excluded PCB Products may still serve as a source of contamination to indoor air or direct exposure. This RAP prioritizes Maintenance Measures that would either remove or encapsulate these PCB-containing materials.

1.5 Abatement and Removal Strategy

The removal and abatement decision flow chart (see Figure 2) provides an outline of the decision process used to determine the prioritization of PCB-containing building material removal or abatement to achieve the initial goals set forth in Section 1. The following further describes the PCB-containing building materials that will receive highest priority for removal, abatement, or other remedial action:

- **Regulatory Driver** – Building materials that fall into the PCB Bulk Product and Remediation Waste categories must be removed or be approved for disposal in place. This RAP proposes the removal of these materials in summer 2010 and 2011. (Note that EPA regulations do not specify the timelines for removal of the PCB Bulk Product and

Remediation Wastes. However, a schedule for compliance with the regulations must be reasonable and protection of public health must be assured until compliance is achieved.)

- **PCB Concentrations** – Those materials with high concentrations will receive the highest priority as they are believed to pose the greatest potential for direct exposure and release of PCBs to indoor air. Materials having PCB concentrations greater than or equal to 50 mg/kg, are characterized as PCB Bulk Product Wastes, and must be removed from the NBHS building or approved for disposal in place since this category of materials constitutes an unauthorized use of PCBs under 40 CFR 761.62. Materials having PCB concentrations less than 50 mg/kg as a result of manufacture are Excluded PCB Products and not regulated. However, Maintenance Measures that will remove or encapsulate these materials will be prioritized based upon PCB concentrations.
- **Accessibility** – Materials containing PCBs that are easily accessible will receive the highest priority when evaluating the need to remove the material because of the potential for direct exposure. In some cases, Maintenance Measures are proposed to reduce or eliminate exposure to PCB-containing building materials that may not require removal (such as Excluded PCB Products). Note that the Accessibility rating takes into account the potential for building occupants to contact PCB-containing building material directly or indirectly via the air handling system.
- **Occupancy** – Materials containing PCBs that are in locations that have a higher rate of occupancy (i.e., used more frequently) will receive the highest priority when evaluating the need to remove the material because of the increased potential for direct exposure. In some cases, Maintenance Measures are proposed to reduce or eliminate exposure to PCB-containing building materials that may not require removal (such as Excluded PCB Products). Note that the Occupancy rating was judged qualitatively based on building use patterns.

Table 2 summarizes TRC’s proposed classifications of the various PCB-containing building materials, scales the relative accessibility and occupancy, and outlines future activities for all of the building materials sampled.

As noted above, in NBHS PCB Bulk Product Wastes are typically those with the highest PCB concentrations and will be given the highest priority for removal. These PCB Bulk Product Wastes are scheduled to be removed during the upcoming school break in summer 2010.

Materials classified as PCB Remediation Wastes typically contain lower concentrations of PCBs based on the model that at NBHS they serve as a sink for airborne PCBs released from all other classifications of PCB materials. Thus, these materials pose the least potential for exposure and will be dealt with accordingly. After the relatively high concentration PCB Bulk Product Wastes have been removed and Excluded PCB products have been removed or otherwise abated, the PCB Remediation Waste materials will be removed for disposal and replaced. Remaining PCB Remediation Wastes are scheduled for removal during the summer breaks in 2010 and 2011.

Excluded PCB Products (i.e., materials with PCB concentrations less than 50 mg/kg) are considered to be less likely to serve as a source of PCB exposure within the buildings. These PCB-containing building materials will be dealt with by Maintenance Measures where, when building repairs or other activities are being performed, these materials will be totally removed so as to incrementally reduce the total load of PCBs within the building over time or be encapsulated to mitigate against direct exposure.

Removal and abatement processes will be performed in a manner that prevents the further spread of PCB contamination in dust generated during remediation activities. Containment structures will be erected at each location where remediation is performed in a manner that prevents airborne dust from spreading outside the remediation area to other areas of the building interior or the building exterior. Dust monitoring will be performed outside the containment structures prior to, during, and after the removal and abatement activity as described in Section 2.4.

1.6 Notifications and Certification

The removal and abatement measures described within this RAP will be initiated after receiving written approval of the plan from EPA. At least thirty days prior to initiating cleanup of the site, notification will be provided to EPA, the Massachusetts Department of Environmental Protection (MassDEP), and the City. The notification will contain a copy of this RAP and a cover letter describing the activities to be performed and the date on which they will be initiated. The RAP will also be presented at a planned public forum to be held in New Bedford so that members of the community may have a chance to discuss the proposed program. The City will also supply a written certification indicating the location of all reports detailing sample collection and analysis procedures used to assess or characterize the PCB contamination at NBHS and that these reports are available for EPA inspection.

1.7 Report Format

Section 2 of this RAP contains a summary of the three classifications of building materials found within NBHS and a discussion of the prioritization for removal. Also included in Section 2 is a schedule for the remediation activities and an outline for Maintenance Measures, the removal and abatement procedures, waste handling and storage procedures, and waste disposal facilities that will be utilized. Section 3 of this RAP details the types of records that will be generated and maintained during remediation and reporting following the completion of all phases for the removal of PCB-containing building products.

2.0 PLANNED REMOVAL AND ABATEMENT ACTIVITIES

PCB-containing building materials sampled within NBHS were classified as PCB Bulk Product Wastes, PCB Remediation Wastes, or Excluded PCB Products based upon the decision process outlined in Figure 2 and described in subsection 1.4. Procedures for establishing priorities for removal and abatement of the PCB-containing building materials were discussed in subsection 1.5. The main components to the removal actions planned for summer 2010 and 2011 are discussed below and the items targeted are summarized in Table 2 (see also Section 2.4 for a proposed removal and abatement schedule). This RAP also discusses select Maintenance Measures and the rationale for these activities which are presented in subsection 2.3 and Table 3.

- **High Priority Items** - Those PCB-containing items given the highest priority will be included in the areas targeted for removal during the earliest available timeframe. This RAP identifies those high priority items proposed for removal or encapsulation when removal is not feasible during the 2010 summer break.
- **High Accessibility/High Occupancy Items** – Some items that have lower PCB concentrations will also be prioritized for removal as part of a Maintenance Measure during summer 2010 or at other times when such actions may be performed without interfering with school operations based upon accessibility and occupancy.
- **Maintenance Measures** – Maintenance Measures will include procedures to limit potential direct exposure or releases to indoor air or complete removal in coordination with facility improvements. For example, where laminate adhesives or mastics that are classified as Excluded PCB Products are exposed, these areas will be encapsulated in a manner that prevents direct exposure and potentially attenuates the release of PCBs to indoor air until that material can be scheduled for removal. Some otherwise lower priority items based on PCB concentration, occupancy, and/or accessibility are also targeted for removal in conjunction with previously planned and scheduled building maintenance activities. This remediation plan provides a general outline for Maintenance Measures to be performed and procedures that need to be followed during their performance.

Following implementation of this RAP it may be necessary to plan future removal activities. However, no such actions are planned beyond those discussed in this RAP. Future activities will be planned in collaboration with the City and EPA and documented in an amended or revised RAP.

Although PCB concentrations are a major factor in determining appropriate removal and disposal options and priorities, other materials may be present that also affect selected procedures. Specifically, many of the building materials targeted for removal may also contain asbestos given that the building was constructed during a period of time when asbestos building materials were widely available in commerce. Massachusetts state law regulates the removal of ACM and certain prescribed procedures must be followed for the removal of ACM, including

ACM that contains PCBs. TRC will perform ACM testing for materials targeted for removal that are suspected of containing asbestos. TRC will also collect samples of potential asbestos containing materials that are not targeted for removal due to PCB content, but that might be disturbed during the proposed removal activities (an example is vinyl floor tiles which might be damaged or destroyed during the removal of univents). Such testing is required to comply with applicable Massachusetts regulations.

Other hazardous materials may also be present, such as heavy metals (paint containing lead or mercury containing electrical switch gear), and these will also need to be considered when determining appropriate removal and disposal procedures. The specifics of implementation for these items will be reflected in the specifications and bid packages prepared to support the City's procurement process.

Table 1 presents the data for total PCB concentrations and the classification for each item that is discussed below. Figures 3 through 5 show the sample locations indicated on Table 1.

2.1 PCB Bulk Product Wastes

PCB Bulk Product Wastes with PCB concentrations greater than 50 mg/kg represent high priority items. These include coatings found within univents located within the NBHS B-block and paint in rooms B-230, A-211-3, and A-213-4. All of these materials will be removed or encapsulated during the removal and abatement efforts to be performed in summer 2010.

Univents - B-block univents will be totally removed and only the utility hookups (i.e., electric supply, water supply, and air-handling duct work), will be left behind so that when a replacement unit is installed it can be connected to the necessary utilities. The external surfaces of the remaining utility connections shall be decontaminated as required following the self-implementing procedures per the §761.79(c) EPA PCB decontamination standards/procedures to ensure that no PCB contamination remains on the utility connections following univent removal.

Prior to univent removal, the univent will be inspected to determine if the associated electric motor unit is equipped with a capacitor (capacitors of certain vintages have the potential to contain PCBs). The univents currently in place are original to the construction of the high school. Required maintenance for these units has likely included replacement of motors. Based on discussions with school officials and facility engineering staff it is believed that there will be few, if any, of the original motors found given the expected duty cycle of heavily used electrical motors over the nearly 40 years NBHS has been in existence. It is also assumed that the capacitors will have a total volume of less than 100 cubic inches and will meet the definition of a Small Capacitor as stated in as defined in 40 CFR Part 761 (the EPA regulations controlling PCB manufacturing, processing, distribution in commerce and use prohibitions), allowing their disposal as solid waste. However, the City may opt to segregate these items for disposal at an appropriately licensed disposal facility.

Capacitors that are not clearly marked as Non-PCB will be assumed to be a PCB Article as defined in 40 CFR Part 761 and will be handled accordingly by wrapping the material to prevent the release of oil and storing the capacitors separately from other PCB-containing building materials for eventual disposal.

The univent coatings are known ACM and procedures for the removal of ACM will be implemented in conjunction with those for PCB-containing items discussed below in subsection 2.5.

Wall Paint - Paint used on walls within room B-230, A-211-3, and A213-4 has also been determined to be a PCB Bulk Product Waste. Removal of the paint will be performed under containment and will include the complete removal of all wallboard that has been painted (this includes only the painted wall board extending above the ceiling tiles). The external walls of these rooms are constructed of cinder block and masonry and the paint cannot be removed without damaging the structural stability of the external wall. A “false wall” will be constructed over these painted external walls in a manner that will prevent any direct contact with the existing painted surface. The location of these walls and the concentration of PCBs determined in the paint will be recorded on the land record as this will constitute a disposal in place.

The materials to be removed and those materials directly in contact will be tested for asbestos content prior to removal of the wallboard. Containment and decontamination will be the same as discussed above and in subsections 2.5 and 2.6.

Removal of the materials listed above will complete the removal of all known PCB Bulk Product Wastes within NBHS except for the painted external walls which will be encapsulated by the construction of the false wall. Removal or the encapsulation of the wall paints listed will also prevent direct exposure to all materials where wipe samples indicate a surface PCB concentration of equal to or greater than $1.0 \mu\text{g}/100 \text{ cm}^2$ which will reduce direct exposure concerns.

2.2 PCB Remediation Wastes

Materials currently deemed to be PCB Remediation Wastes will be scheduled for removal as set forth below. These materials typically include polyurethane foam associated with chairs and couches and gym mats within the high school. These materials will not be removed under containment but instead will be removed as a whole without breaking the materials down and transported to a storage area for disposal as described in subsection 2.6.

Currently, the following readily removable items are targeted for removal and disposal in summer 2010:

- A-203-4 Leather Chair, A-303-3 Chair, A-217-1 Red-Orange Chair, A-203-4 Leather Chair, A-213-2 Leather Chair, D-136 Blue Mat, B-2424 Chair, and other pieces of furniture with polyurethane foam that are beyond their useful lifetime.

No other removal of materials classified as PCB Remediation Waste is planned for summer 2010 because replacement materials are subject to re-contamination by other PCB sources in the building. TRC recommends the delay of scheduling the large-scale removal of PCB Remediation Wastes, such as auditorium foam cushions, until after significant quantities of PCB source materials are removed from the building during summer 2010 to mitigate the potential for contamination of new materials. Future PCB Remediation Waste abatement will be scheduled in consultation with EPA to help ensure reasonable protection of public health and is anticipated to be performed in summer 2011. This removal action would include removal of all polyurethane foam from the auditoriums and other high occupancy areas and the procedures to be used will be detailed in an additional removal and abatement plan to be submitted to EPA Region 1 for review and approval.

2.3 Excluded PCB Products

Excluded PCB Products are those that were installed during construction and predate the federal regulations concerning PCBs, have PCB concentrations less than 50 mg/kg, and have not had PCB concentrations diluted by construction and maintenance activities performed within the high school. Thus, these PCB-containing building materials are regulated for use as Excluded PCB products under 40 CFR Part 761. Those building materials that fall into the Excluded PCB Products are identified on Table 1. Excluded PCB Products are not required to be removed under applicable EPA regulations. However, building occupants still might be exposed to PCBs in or released to air from these PCB-containing building materials. Thus, the City plans to conduct Maintenance Measures to reduce exposures over time are planned and are detailed below and in Table 3.

Removal or encapsulation of Excluded PCB Products may be beneficial to reducing the overall exposure to PCBs within the building; however, because of their lower concentrations Excluded PCB products do not receive highest priority at this time. An overall Maintenance Measure program is discussed below and will be developed further by the City in consultation with TRC to address these materials. Schedules for implementation beyond that discussed within this RAP will be provided to EPA for concurrence and future verification purposes. These activities could include removal and replacement of windows that would also include removal and replacement of window caulks and glazing which are Excluded PCB Products. If planned facility improvements allow for materials are to be removed and replaced with new materials, then removal actions will be performed in a manner consistent with that described in subsection 2.5 for removal actions that could generate dust.

2.3.1 Removal Action Programs

Removal action programs are proposed for Wall Divider Gaskets and Push Pin Materials. Both of these materials are classified as Excluded PCB Products but are present in classrooms, have higher average PCB concentrations, and cannot be encapsulated. All Wall Divider Gaskets will be removed and replaced over the next three years. Removal will involve scraping to remove all

remnants of the gasket and then replacement with new. (At the City's option, the entire divider wall may be replaced in total.) Push pin materials will be replaced with new. No special handling or disposal methods are proposed but site workers shall be trained in methods to prevent exposure to PCBs during removal actions.

2.3.2 Annual Inspection and Maintenance Programs

Annual Inspection and Maintenance Programs are proposed for paint, window caulking and glazing, vinyl cove base, tile, mastics, joint materials, and laminate adhesives. These programs are designed to ensure that Excluded PCB Products are in good condition and that encapsulation methods are functioning so as to limit potential exposures or releases. Annual inspections will be performed before the end of the school year so that corrective measures can be performed during the following summer break. Inspection reports will be prepared and maintained at the school and any corrective actions performed will also be recorded and maintained at the same location.

Painted surfaces throughout the school buildings will be inspected to ensure that all paint is in good condition. Paint that is found to be chipping, flaking or cracking will be repainted with as much of the damaged paint removed as possible prior to the application of the new paint. Paint removal will be done in a manner that prevents dust from being released. In addition, ten to twenty wipe samples will also be performed at random locations throughout the school as part of the inspection program. Painted surfaces with wipe sample analytical results $\geq 1.0 \mu\text{g}/100 \text{ cm}^2$ will be repainted.

Window caulking and glazing throughout the school will be inspected to ensure that these materials are in good condition and not flaking or cracking. Caulks and glazing that are in poor condition will be completely removed in a manner that prevents dust from being released and replaced with new. Any school wide program of window replacement will also involve total removal and replacement of window caulks and glazing.

Vinyl cove base and tile throughout the school will be inspected to ensure that these materials are in good condition and in-place so that mastics are not exposed. Cove base and tile that are in poor condition or that are missing will be replaced. Prior to replacing these materials all of the mastic used to secure these building materials shall be removed. Mastic on wallboard can be removed by scraping, but mastic on concrete floors may require grinding to completely remove. Any grinding work will be performed with equipment equipped with High Efficiency Particulate Air (HEPA) filtration to prevent the release of dust.

Joint materials will be inspected throughout the school to ensure that these materials are in good condition and in-place. Materials in poor condition will be removed and replaced with new. Joints will be scraped to remove all of the in-place materials and grinding with HEPA filtration equipped equipment may be required to achieve a clean surface prior to installing new materials.

Cabinets and casework within each of the classrooms will be inspected to ensure that laminate is intact and covering all adhesive materials. Laminate in poor condition will be removed along with the securing adhesive in a manner that prevents the release of dust. New laminate and adhesive will be applied. Cabinets and casework found to be in poor condition will be replaced.

2.3.3 Other Building Materials

No removal or inspection programs are proposed for other building materials such as carpets and padding, pipe wrap, wallboard, or concrete are proposed. These materials will be replaced when existing materials have reached the end of their useful life.

2.4 Proposed Removal and Abatement Schedule

The overall goal of the removal and abatement program and related Maintenance Measures is to reduce the potential for building occupant exposure to PCBs in PCB-containing building materials by either removal or encapsulation prevent volatilization or direct exposure. Table 3 lists building material types and proposed dates, if known at this time, when they will be addressed.

Removal and Abatement. The removal and abatement project will be performed during the summer break in 2010 and those materials to be removed are listed on Table 3. The goal will be to remove those PCB Bulk Product Waste that are considered to be the highest priority for removal as they are deemed to pose the highest potential for exposure. These materials include:

- **B-Block Univents** – Those univents that have the PCB-containing coating, typically found in the B-Block area.
- **Laminate Adhesives** – Those laminate adhesives known or suspected to contain higher concentrations of PCBs and classified as PCB Bulk Product Wastes. The area targeted for summer 2009 removal activity is B-Block classroom B-240 and A-Block classrooms A-319-3 and A-205-4.
- **Wall Paints** – Wall paint known or suspected to contain higher concentrations of PCBs in a closet in room A-206-4.

This removal and abatement action will also include the following PCB Remediation Wastes:

- **Seats/Chairs** – A-203-4 Leather Chair, A-303-3 Chair, A-217-1 Red-Orange Chair, A-203-4 Leather Chair, A-213-2 Leather Chair, D-136 Blue Mat, B-2424 Chair.
- **Select Other Furniture** – Any other polyurethane foam furniture deemed to be at the end of its useful life.

Maintenance Measure that can be performed as part of building maintenance activities and that will serve to reduce the potential for direct exposure to PCB-containing building materials will also be given a high priority for implementation. These measures will be performed by the City and are outside the scope of this RAP and have not been fully determined. However, these measures may include:

- **Repairs for Floor Tiles, Cove Base, and Laminate** – Damaged and missing floor tiles, cove base, and laminate surfaces will be replaced. Replacement of these materials will prevent direct exposure to PCB-containing adhesives and mastics.
- **Repainting Surfaces** – If the results from wipe tests to be performed indicate that surface concentrations of PCB exceed $1 \mu\text{g}/100\text{cm}^2$, these surfaces will be repainted to reduce the potential for direct exposure.

In addition, TRC will coordinate with the City regarding a previously planned program for the replacement of windows at NBHS as a Maintenance Measure. TRC will work with the City to develop a plan that will totally remove window caulking and glazing containing PCBs such that the new caulking and glazing materials will not be contaminated by old materials.

EPA will require an implementation schedule for NBHS Maintenance Measures addressing PCB-containing building materials for review and approval.

Subsequent Phases of Removal and Abatement. Subsequent removal and abatement activities will target remaining PCB Bulk Product and PCB Remediation Wastes that are not addressed by the summer 2010 program and that must be removed from the NBHS facility in compliance with applicable EPA regulations. Any such activity will be described in an Amended RAP. Removal of PCB Bulk Product and PCB Remediation Wastes will proceed iteratively during subsequent summer school vacation periods until complete under an EPA approved schedule.

A specific timetable for the removal of all PCB Bulk Product and Remediation Wastes cannot be provided at this time due to the 1) site specific and customized nature of the remedial approaches and 2) the short project access timeframes given the need to maintain the functionality of the facility. However, the removal of all PCB Bulk Product and Remediation Wastes from the interior of the NBHS building will define the end of the removal and abatement activity required under regulation.

In addition, removal and/or abatement plans will be developed and scheduled for the Materials of Undetermined Status if the additional data to be collected indicate that removal and abatement are required under the regulations.

Maintenance Measures for Excluded PCB Products will continue into the foreseeable future as a responsibility of the School Department and facility engineering and maintenance staff. The Maintenance Measures will focus on keeping materials that overlie or otherwise cover PCB-containing building materials classified as Excluded PCB Products to mitigate exposures. In

addition, where opportunities to remove or replace Excluded PCB Products are identified, they will be prioritized and conducted in a manner to prevent the uncontrolled release of PCB-containing building materials to the interior space. Maintenance Measures will be outlined in a schedule provided for EPA concurrence for future verification purposes.

2.5 Removal and Abatement Procedures

Removal and abatement measures described in this RAP will be performed following the procedures outlined in this subsection. All remedial measures will be performed under containment. The Containment Area shall consist of polyethylene sheeting (or equivalent) draped over existing building features or structures constructed specifically for the Containment Area. The Containment Area shall be maintained under negative air pressure by installing an induced draft fan within the Containment Area that will be equipped with HEPA filters to prevent dust particles from being entrained and forced from the Containment Area. The exhaust from the fan will be routed outside the Containment Area and vented outside of the building.

It is anticipated that workers and students will use the NBHS buildings during the summer months while removal and abatement is ongoing. However, to prevent exposure of these persons to contaminated dust, a Control Area will be established outside of the Containment Area. Only properly trained personnel associated with the removal and abatement actions will be allowed within the Control Area that will be established by placing barriers with signs indicating that access to the area is restricted. The TRC field inspector will maintain the Control Area and escort unauthorized personnel from the area promptly. Only those personnel actively working on the removal and abatement will be allowed within the Containment Area and they shall be equipped with Personal Protective Equipment (PPE) as required for ACM removal under Massachusetts regulations or with half-face dust respirators and Tyvek suits if materials to be removed are PCB-containing only.

Dust monitoring will be performed in the Control area immediately outside the Containment Area prior to initiating the remedial action, during performance of the action, and following the remediation which will include the demolition of the Containment Area. Monitoring will be performed for total suspended particulate (TSP) and additional monitoring will be performed for fibers when the removal action includes asbestos containing materials (ACM). Prior monitoring of airborne dust at NBHS indicates that the background concentration of TSP is approximately $50 \mu\text{g}/\text{m}^3$. The background concentration will be verified prior to initiating remedial actions and a remedial area background level will be established. If, during the performance of air monitoring during remediation, dust levels outside the Containment Area are observed to increase by 20-percent over those observed prior to the remediation, the contractor shall be instructed to stop work, reestablish the Containment Area, and then will be required to decontaminate the remainder of the Control Area outside containment prior to restarting work on the remediation. Additional wipe samples will be collected from the decontaminated area outside the containment as described below.

Polyethylene sheeting (or equivalent) used as part of the containment will not be reused for other Containment Areas. The sheeting will be used to wrap PCB Bulk Product Wastes prior to disposal or transported to the disposal storage area for disposal.

Following the remedial actions and demolition of the Containment Area, the selected contractor will wipe the entire area with wet rags to remove any dust from surfaces within the area. These rags will be containerized or wrapped in plastic and transported to the disposal storage area for disposal with the PCB Bulk Storage Wastes. The TRC field inspector will visually inspect the decontaminated area and either instruct the contractor to perform additional decontamination or collect wipe samples from surfaces within the former Containment Area according to the procedures specified in the federal regulations for PCBs provided in §761.123.

A minimum of two wipe samples will be collected for PCB analysis within each Containment Area, preferably from horizontal surfaces where dust is most likely to accumulate. If the surface area within a Containment Area exceeds 8,000 square feet, representing a contained area larger than 20 feet by 20 feet by 20 feet, then a total of four wipe samples will be collected for PCB analysis from within the Containment Area.

Additional wipe samples will be collected during the removal of univents within the B-Block. Five utility connections will remain following removal of each univent, cold water inlet and outlet, hot water inlet and outlet, and a single electrical conduit. Each of these five connections will be wipe sampled following the removal of the first two univent to ensure that decontamination procedures are sufficient. The project monitor will measure the actual area wiped because the size and shape of these utility hookups will not allow for the use of a standard template and measures will be taken to ensure that the area wiped is equal to or greater than 100 square centimeters.

If the wipe samples from the first two univent removals all achieve the remedial goal of $<1\mu\text{g}/100\text{ cm}^2$, the frequency of sampling will be reduced to two wipe samples from the utility connections per univent removed. However, if any of the wipe sample results fail then decontamination procedures will be modified and testing will be resumed at the original frequency until wipe sample results indicate that the new procedures are adequate.

The Containment Area will be considered to be sufficiently decontaminated if all wipe samples collected within the area are less than $1\mu\text{g}/100\text{ cm}^2$. If this standard is not met for all of the wipe samples, the contractor will be required to perform further decontamination of the areas for which the standard has been exceeded. Additional wipe samples will be collected for PCB analysis following this decontamination at the same frequency as stated above. These procedures will be repeated until the $1\mu\text{g}/100\text{ cm}^2$ standard has been achieved.

2.6 Materials Handling and Storage Procedures

All PCB-containing materials scheduled for removal and disposal as described in this RAP will be handled and stored for eventual disposal according to the procedures described within this

section. Following removal and breakdown of materials within containment, all materials to be disposed will be wrapped in polyethylene sheeting (or equivalent) and immediately transported to the designated storage area.

The disposal storage area will be secured by temporary fencing equipped with a lock to prevent easy access to the area. Materials to be disposed will be stored in a container that will be lined and equipped with a tarp that shall cover the entire open top of the container to prevent rainwater infiltration. The container shall be covered at all times except when in use. If PCB capacitors are found within the univents, these will be wrapped and stored in a drum and disposal will be arranged for separately.

Materials designated for disposal will be removed from the site for transport to the designated disposal facility within 30 days. Given the estimated tonnage to be removed, the EPA Region 1 PCB Coordinator may be asked to extend the period of storage and qualify the waste disposal area as a less than 90-day storage area. This will only be done if the container is not filled within the 30-day limit and limited additional material is scheduled for removal. All storage containers, drums and rolloffs, will be clearly marked with the date that materials for disposal were first placed within the container. The TRC field inspector will make note of this date, ensure that removal for disposal occurs within 30 days. NBHS personnel will also note the condition of all storage containers on a daily basis.

2.7 Disposal Facilities

All PCB Bulk Product Wastes and PCB Remediation Wastes will be transported to the Chemical Waste Management Chemical Services Landfill located in Model City, New York if this facility is accepting debris at the time of disposal. If Model City is not accepting wastes of the type that will be generated during this project all of the waste materials will be shipped to either the Waste Management Inc. Landfill located in Emelle, Alabama or the Wayne Disposal Landfill located in Wayne, Michigan. It is estimated that approximately fifteen (15) tons of building materials will be removed during the site remediation performed during summer 2010 for transport and disposal at this facility.

Materials designated for disposal as PCB Remediation Wastes at concentrations less than 50 mg/kg will be stored in the same manner as PCB Bulk Product Wastes and then transported for disposal at the Turnkey Landfill in Rochester, New Hampshire. PCB Remediation Wastes designated for disposal in this manner include chairs and other pieces of furniture with polyurethane foam. These materials will not be removed during remedial actions performed during summer 2010 but are referenced here so that the necessary approvals can be secured at the time they are designated for disposal.

3.0 DOCUMENTATION OF REMOVAL AND ABATEMENT EFFORTS

Documentation of the field activities will be performed on a daily basis by the contractor and TRC during the performance of the remedial measures. The TRC field inspector will be responsible for completing the documentation described below. TRC will prepare a Remedial Action Report (RAR) after the conclusion of the removal and abatement program which will summarize the remedial activities.

3.1 Field Notes

The TRC field inspector will maintain a daily log of on-site activities. That log will include, but not be limited to the following:

- Daily health and safety meetings.
- Personnel and equipment on site.
- Field procedures and observations.
- Removal, abatement, containment, and decontamination progress.
- Sample locations with selection criteria, samples collected, analyses performed, sample handling.
- Telephone or other instructions.
- Health and Safety issues.
- Health and Safety monitoring data including dust monitoring outside containments.
- Estimate of wastes generated and stored.
- Waste transporter information.

3.2 Photographs

Daily photographs will be taken of representative activities, such as removal and abatement work, containment structures, decontamination, sampling, and waste handling and storage. Copies of selected photographs with appropriate captions will be included in the RAR.

3.3 Transport and Treatment/Disposal Certifications

Manifests and/or Bills of Lading for the transportation, treatment and disposal of waste materials and certifications of the treatment of the wastes, if necessary, will be obtained from the transporter and from the treatment/disposal facility. Copies of these forms will be included in the RAR and records will be maintained in accordance with the requirements as specified in 40 CFR 761 Subpart K (PCB Waste Disposal Records and Reports).

3.4 Removal and Abatement Action Report

The RAR will be prepared by TRC upon completion of all remedial activities. The RAR will include the following.

- Site description
- A description of field procedures
- Verification sample locations and analytical results
- A photographic record of the removal and abatement, containment structures, and decontamination
- Dust monitoring data
- Waste transport and treatment disposal information
- Copies of waste manifests and bills of lading

TABLES

Table 1
Bulk Product Sample Results
New Bedford High School
New Bedford, MA

| Sample # ¹ | Type of sample | Location | Description | PCB Concentration (mg/kg) | Date Installed | Classification |
|---------------------------|----------------|-----------|---------------------------------|---------------------------|----------------|------------------------|
| Univent Coatings | | | | | | |
| 376 | BULK | B-211 | Univent Coating | 255 | Original | PCB Bulk Product Waste |
| 452 | BULK | B-312 | Univent Coating | 116 | Original | PCB Bulk Product Waste |
| 449 | BULK | B-240 | Univent Coating | 65.4 | Original | PCB Bulk Product Waste |
| 453 | BULK | B-318 | Univent Coating | 33.5 | Original | Excluded PCB Product |
| 448 | BULK | B-129 | Univent Coating | 6.57 | Original | Excluded PCB Product |
| 450 | BULK | B-212 | Univent Coating | 6.53 | Original | Excluded PCB Product |
| 451 | BULK | B-354 | Univent Coating | 4.67 | Original | Excluded PCB Product |
| 478 | BULK | B-116 | Univent Coating | 1.763 | Original | Excluded PCB Product |
| Laminate Adhesives | | | | | | |
| 109 | BULK | B-240 | White Laminate Adhesive | 230 | Original | PCB Bulk Product Waste |
| 325 | BULK | A-319-3 | Lt. Brown Laminate Adhesive | 176.9 | Original | PCB Bulk Product Waste |
| 577 | BULK | A-203-4 | Red Laminate Adhesive | 141.8 | Original | PCB Bulk Product Waste |
| 117 | BULK | A-205-4 | White Laminate Adhesive | 114 | Original | PCB Bulk Product Waste |
| 550 | BULK | B-287 | Red Laminate Adhesive | 13.5 | Original | Excluded PCB Product |
| 371 | BULK | B-211 | Laminate Adhesive | 11.8 | Original | Excluded PCB Product |
| 550 Dup | BULK | B-287 | Red Laminate Adhesive | 10.1 | Original | Excluded PCB Product |
| 337 | BULK | A-316-4 | Laminate Adhesive | 8.12 | Original | Excluded PCB Product |
| 527 | BULK | A-110-4 | Red Laminate Adhesive | 6.45 | Original | Excluded PCB Product |
| 351 | BULK | A-309-1 | Laminate Adhesive | 6.128 | Original | Excluded PCB Product |
| 354 | BULK | A-316-1 | Laminate Adhesive | 5.705 | Original | Excluded PCB Product |
| 526 | BULK | B-265 | Laminate Adhesive | 5.59 | Original | Excluded PCB Product |
| 385 | BULK | B-344 | Laminate Adhesive | 5.39 | Original | Excluded PCB Product |
| 342 | BULK | A-311-4 | Laminate Adhesive | 5.03 | Original | Excluded PCB Product |
| 344 | BULK | A-227-1 | Laminate Adhesive | 4.752 | Original | Excluded PCB Product |
| 428 | BULK | Prep Room | Laminate Adhesive | 4.63 | Original | Excluded PCB Product |
| 348 | BULK | A-213-1 | Laminate Adhesive | 4.531 | Original | Excluded PCB Product |
| 530 | BULK | A-111-3 | Red Laminate Adhesive | 4.29 | Original | Excluded PCB Product |
| 358 | BULK | A-309-4 | Laminate Adhesive | 4.006 | Original | Excluded PCB Product |
| 319 | BULK | A-306-2 | Laminate Adhesive | 3.5 | Original | Excluded PCB Product |
| 355 | BULK | A-311-1 | Laminate Adhesive | 3.496 | Original | Excluded PCB Product |
| 316 | BULK | A-312-2 | Laminate Adhesive | 3.35 | Original | Excluded PCB Product |
| 227 | BULK | A-117-1 | Laminate Adhesive | 3.246 | Original | Excluded PCB Product |
| 432 | BULK | A-309-2 | Laminate Adhesive | 3.22 | Original | Excluded PCB Product |
| 529 | BULK | A-110-3 | Red Laminate Adhesive | 2.93 | Original | Excluded PCB Product |
| 299 | BULK | A-209-2 | Laminate Adhesive | 2.916 | Original | Excluded PCB Product |
| 288 | BULK | A-209-4 | Laminate Adhesive | 2.903 | Original | Excluded PCB Product |
| 528 | BULK | A-111-4 | Red Laminate Adhesive | 2.85 | Original | Excluded PCB Product |
| 334 | BULK | A-319-4 | Laminate Adhesive | 2.528 | Original | Excluded PCB Product |
| 272 | BULK | A-116-4 | Laminate Adhesive | 2.52 | Original | Excluded PCB Product |
| 305 | BULK | A-217-3 | Laminate Adhesive | 2.383 | Original | Excluded PCB Product |
| 401 | BULK | C-216 | Laminate Adhesive | 2.22 | Original | Excluded PCB Product |
| 571 | BULK | A-318-3 | Laminate Adhesive | 2.08 | Original | Excluded PCB Product |
| 314 | BULK | A-308-2 | Laminate Adhesive | 1.97 | Original | Excluded PCB Product |
| 126 | BULK | A-311-2 | Laminate Adhesive | 1.95 | Original | Excluded PCB Product |
| 330 | BULK | A-310-3 | Laminate Adhesive | 1.861 | Original | Excluded PCB Product |
| 104 | BULK | A-114-3 | Laminate Adhesive | 1.314 | Original | Excluded PCB Product |
| 223 | BULK | A-112-1 | Laminate Adhesive | 1.00 | Original | Excluded PCB Product |
| 439 | BULK | B-320 | Laminate Adhesive | 0.943 | Original | Excluded PCB Product |
| 392 | BULK | D-213 | Laminate Adhesive | 0.533 | Original | Excluded PCB Product |
| 549 | BULK | A-209-1 | Red Laminate Adhesive | <0.921 | Original | Excluded PCB Product |
| 547 | BULK | A-210-2 | Laminate Adhesive | <0.965 | Original | Excluded PCB Product |
| 600 | BULK | A-210-4 | Red Laminate Adhesive | <0.962 | Original | Excluded PCB Product |
| 596 | BULK | A-211-1 | Red Laminate Adhesive | <0.954 | Original | Excluded PCB Product |
| 597 | BULK | A-211-2 | Red Laminate Adhesive | <0.958 | Original | Excluded PCB Product |
| 579 | BULK | A-211-3 | Laminate Adhesive | <0.890 | Original | Excluded PCB Product |
| 599 | BULK | A-211-4 | Red Laminate Adhesive | <0.877 | Original | Excluded PCB Product |
| 555 | BULK | A-213-2 | Red Laminate Adhesive | <0.942 | Original | Excluded PCB Product |
| 581 | BULK | A-213-3 | Laminate Adhesive | <0.992 | Original | Excluded PCB Product |
| 598 | BULK | A-213-3 | Red Laminate Adhesive | <0.885 | Original | Excluded PCB Product |
| 578 | BULK | A-227-4 | Laminate Adhesive | <0.940 | Original | Excluded PCB Product |
| 580 | BULK | A-228-3 | Laminate Adhesive | <0.933 | Original | Excluded PCB Product |
| 569 | BULK | A-303-3 | Red Laminate Adhesive | <0.962 | Original | Excluded PCB Product |
| 601 | BULK | A-304-4 | Tan/Blue tint Laminate Adhesive | <0.969 | Original | Excluded PCB Product |
| 602 | BULK | A-308-4 | Red Laminate Adhesive | <0.980 | Original | Excluded PCB Product |
| 575 | BULK | A-319-1 | Laminate Adhesive | <0.938 | Original | Excluded PCB Product |
| 603 | BULK | A-319-2 | Red Laminate Adhesive | <0.973 | Original | Excluded PCB Product |
| 568 | BULK | B-242 | Laminate Adhesive (redo-506) | <0.901 | Original | Excluded PCB Product |
| 551 | BULK | B-309 | Red Laminate Adhesive | <0.859 | Original | Excluded PCB Product |
| 484 | BULK | B-363 | Red Laminate Adhesive | <0.701 | Original | Excluded PCB Product |
| 586 | BULK | D-120 | Laminate Adhesive | <0.850 | Original | Excluded PCB Product |
| 587 | BULK | D-136 | Laminate Adhesive | <0.871 | Original | Excluded PCB Product |
| 524 | BULK | D-216 | Red Laminate Adhesive | <0.923 | Original | Excluded PCB Product |
| 524 Dup | BULK | D-216 | Red Laminate Adhesive | <0.980 | Original | Excluded PCB Product |
| 604 | BULK | D-232 | Red Laminate Adhesive | <0.893 | Original | Excluded PCB Product |
| 393 | BULK | D-218 | Laminate Adhesive | <2.37 | Original | Excluded PCB Product |
| 369 | BULK | B-253 | Laminate Adhesive | <0.477 | Original | Excluded PCB Product |
| 267 | BULK | A-115-2 | Laminate Adhesive | <0.409 | Original | Excluded PCB Product |
| 250 | BULK | A-312-1 | Laminate Adhesive | <0.242 | Original | Excluded PCB Product |
| 275 | BULK | A-110-2 | Laminate Adhesive | <0.158 | Original | Excluded PCB Product |

Table 1
Bulk Product Sample Results
New Bedford High School
New Bedford, MA

| Sample # ¹ | Type of sample | Location | Description | PCB Concentration (mg/kg) | Date Installed | Classification |
|-----------------------|----------------|-------------|---------------------------------|---------------------------|----------------|------------------------|
| Paint | | | | | | |
| 291 | BULK | A-206-4 | Blue Paint | 94.4 | 1999-2000 | PCB Bulk Product Waste |
| 502 | BULK | B-230 | White Paint | 55.7 | 1999-2000 | PCB Bulk Product Waste |
| 507 | BULK | A-211-3 | Paint | 42.69 | 1999-2000 | PCB Bulk Product Waste |
| 133 | BULK | A-213-4 | New paint (blue) | 26.2 | 1999-2000 | PCB Bulk Product Waste |
| 458 | WIPE | A-213-4 | Wipe sample, Blue Paint | 1.02 | 1999-2000 | Not Applicable |
| 380 | BULK | B-320 | Green Paint | 17.81 | 1999-2000 | Excluded PCB Product |
| 469 | WIPE | B-320 | Wipe sample, Light Green Paint | <0.5 | 1999-2000 | Not Applicable |
| 349 | BULK | A-309-1 | Green Paint | 16.72 | 1999-2000 | Excluded PCB Product |
| 463 | WIPE | A-309-1 | Wipe sample, Green Paint | <0.5 | 1999-2000 | Not Applicable |
| 464 | BULK | A-309-1 | Old Yellow Paint | 16.4 | Original | Excluded PCB Product |
| 442 | BULK | A-213-4 | Blue Paint | 16.15 | 1999-2000 | Excluded PCB Product |
| 289 | BULK | A-209-4 | Blue Paint | 14.71 | 1999-2000 | Excluded PCB Product |
| 456 | WIPE | A-209-4 | Wipe sample, Blue Paint | <0.5 | 1999-2000 | Not Applicable |
| 460 | BULK | A-309-4 | Old White Paint | 14.71 | Original | Excluded PCB Product |
| 459 | WIPE | A-309-4 | Wipe sample, Blue Paint | <0.5 | 1999-2000 | Not Applicable |
| 503 | BULK | A-228-3 | Paint | 14.31 | 1999-2000 | Excluded PCB Product |
| 473 | BULK | D-124 | Old Green Paint | 14.3 | Original | Excluded PCB Product |
| 472 | WIPE | D-124 | Wipe sample, Green Paint | <0.5 | 1999-2000 | Not Applicable |
| 483 | BULK | B-363 | Paint | 13.5 | 1999-2000 | Excluded PCB Product |
| 457 | BULK | A-209-4 | Old Light Green Paint | 12.2 | Original | Excluded PCB Product |
| 470 | BULK | B-320 | Old Yellow Paint | 12.0 | Original | Excluded PCB Product |
| 406 | BULK | D-124 | Green Paint | 11.84 | 1999-2000 | Excluded PCB Product |
| 309 | BULK | A-223-3 | Tan Paint | 10.91 | 1999-2000 | Excluded PCB Product |
| 465 | WIPE | A-223-3 | Wipe sample, Tan Paint | 0.91 | 1999-2000 | Not Applicable |
| 409 | BULK | D-115 | Beige Paint | 10.57 | 1999-2000 | Excluded PCB Product |
| 471 | WIPE | D-115 | Wipe sample, Yellow Paint | <0.5 | 1999-2000 | Not Applicable |
| 360 | BULK | A-309-4 | Blue Paint | 10.53 | 1999-2000 | Excluded PCB Product |
| 466 | BULK | A-223-3 | Old Tan Paint | 10.09 | Original | Excluded PCB Product |
| 269 | BULK | A-115-2 | Gold Paint | 9.96 | 1999-2000 | Excluded PCB Product |
| 429 | BULK | A-309-2 | Gold Paint | 9.46 | 1999-2000 | Excluded PCB Product |
| 353 | BULK | A-316-1 | Green Paint | 9.34 | 1999-2000 | Excluded PCB Product |
| 116 | BULK | A-205-4 | Green paint from I-Beams | 8.84 | 1999-2000 | Excluded PCB Product |
| 134 | BULK | A-212/213-4 | Green paint from I-Beams | 8.41 | 1999-2000 | Excluded PCB Product |
| 347 | BULK | A-207-1 | Green Paint | 7.71 | 1999-2000 | Excluded PCB Product |
| 570 | BULK | | Tan Paint | 7.54 | 1999-2000 | Excluded PCB Product |
| 426 | BULK | Prep Room | Green Paint | 7.42 | 1999-2000 | Excluded PCB Product |
| 323 | BULK | A-319-3 | Tan Paint | 7.06 | 1999-2000 | Excluded PCB Product |
| 345 | BULK | A-227-1 | Green Paint | 6.68 | 1999-2000 | Excluded PCB Product |
| 297 | BULK | A-207-2 | Gold Paint | 6.65 | 1999-2000 | Excluded PCB Product |
| 509 | BULK | D-250 | Yellow/Tan Paint | 6.63 | 1999-2000 | Excluded PCB Product |
| 444 | BULK | A-205-4 | Blue Paint | 6.48 | 1999-2000 | Excluded PCB Product |
| 570 Dup | BULK | A-303-3 | Tan Paint over Blue Paint | 6.47 | 1999-2000 | Excluded PCB Product |
| 226 | BULK | A-117-1 | Green Wall Paint | 6.43 | 1999-2000 | Excluded PCB Product |
| 576 | BULK | A-319-1 | Paint | 6.11 | 1999-2000 | Excluded PCB Product |
| 113 | BULK | A-205-4 | New paint (blue) | 6.07 | 1999-2000 | Excluded PCB Product |
| 307 | BULK | A-217-3 | Tan Paint | 6.02 | 1999-2000 | Excluded PCB Product |
| 300 | BULK | A-209-2 | Gold Paint | 5.98 | 1999-2000 | Excluded PCB Product |
| 576 Dup | BULK | A-319-1 | Paint | 5.76 | 1999-2000 | Excluded PCB Product |
| 582 | BULK | A-213-2 | Paint | 5.73 | 1999-2000 | Excluded PCB Product |
| 254 | BULK | A-312-1 | Green Wall Paint (w/ some blue) | 5.57 | 1999-2000 | Excluded PCB Product |
| 122 | BULK | A-311-2 | New paint (beige/gold) | 5.418 | 1999-2000 | Excluded PCB Product |
| 490 | BULK | A-203-4 | Paint | 5.22 | 1999-2000 | Excluded PCB Product |
| 510 | BULK | D-250 | Blue Paint | 5.1 | 1999-2000 | Excluded PCB Product |
| 387 | BULK | B-373 | Green Paint | 4.97 | 1999-2000 | Excluded PCB Product |
| 317 | BULK | A-312-2 | Gold Paint | 4.92 | 1999-2000 | Excluded PCB Product |
| 273 | BULK | A-116-4 | Blue Paint (w/ some yellow) | 4.7 | 1999-2000 | Excluded PCB Product |
| 440 | BULK | A-311-2 | Gold Paint | 4.64 | 1999-2000 | Excluded PCB Product |
| 148 | BULK | A-311-2 | Old paint (blue) | 4.512 | 1999-2000 | Excluded PCB Product |
| 283 | BULK | A-208-4 | Blue Paint | 4.41 | 1999-2000 | Excluded PCB Product |
| 293 | BULK | A-227-4-O | Blue Paint | 4.24 | 1999-2000 | Excluded PCB Product |
| 419 | BULK | A-107-2 | Gold Paint | 4.184 | 1999-2000 | Excluded PCB Product |
| 420 DUP | BULK | B-122 | Green Paint | 4.00 | 1999-2000 | Excluded PCB Product |
| 420 | BULK | B-122 | Green Paint | 3.98 | 1999-2000 | Excluded PCB Product |
| 422 | BULK | B-287 | Green Paint | 3.79 | 1999-2000 | Excluded PCB Product |
| 419 DUP | BULK | A-107-2 | Gold Paint | 3.50 | 1999-2000 | Excluded PCB Product |
| 357 | BULK | A-311-1 | Green Paint | 3.28 | 1999-2000 | Excluded PCB Product |
| 414 DUP | BULK | C-211 | White Paint | 3.163 | 1999-2000 | Excluded PCB Product |
| 411 | BULK | D-301 | Blue Paint | 3.16 | 1999-2000 | Excluded PCB Product |
| 414 | BULK | C-211 | White Paint | 3.118 | 1999-2000 | Excluded PCB Product |
| 312 | BULK | A-308-2 | Gold Paint | 3.06 | 1999-2000 | Excluded PCB Product |
| 413 | BULK | C-216 | Yellow Paint | 2.946 | 1999-2000 | Excluded PCB Product |
| 216 | BULK | A-112-1 | Green Paint | 2.73 | 1999-2000 | Excluded PCB Product |
| 413 DUP | BULK | C-216 | Yellow Paint | 2.701 | 1999-2000 | Excluded PCB Product |
| 404 | BULK | D-143 | Yellow Paint | 2.113 | 1999-2000 | Excluded PCB Product |
| 416 DUP | BULK | E-136 | Beige Paint | 1.556 | 1999-2000 | Excluded PCB Product |
| 135 | BULK | A-213-4 | Old paint (tan) | 1.314 | 1999-2000 | Excluded PCB Product |
| 365 | BULK | B-226 | Green Paint | 1.308 | 1999-2000 | Excluded PCB Product |
| 407 | BULK | D-111 | Green Paint | 1.247 | 1999-2000 | Excluded PCB Product |
| 416 | BULK | E-136 | Beige Paint | 1.15 | 1999-2000 | Excluded PCB Product |
| 477 | BULK | D-115 | Old Beige Paint / Cinder Block | 0.647 | Original | Excluded PCB Product |
| 417 | BULK | Stairs | Beige Paint | 0.526 | 1999-2000 | Excluded PCB Product |
| 114 | BULK | A-205-4 | Old paint (tan) | 0.3344 | 1999-2000 | Excluded PCB Product |
| 274 | BULK | B-145 | Yellow Paint (w/ some blue) | <1.64 | 1999-2000 | Excluded PCB Product |
| 147 | BULK | A-311-2 | Green paint from I-Beams | <0.05 | 1999-2000 | Excluded PCB Product |

Table 1
Bulk Product Sample Results
New Bedford High School
New Bedford, MA

| Sample # ¹ | Type of sample | Location | Description | PCB Concentration (mg/kg) | Date Installed | Classification |
|------------------------------------|----------------|-------------|---------------------------------------|---------------------------|----------------|-----------------------|
| Polyurethane Foam Materials | | | | | | |
| 492 | BULK | A-203-4 | Seat Cushion from Leather Chair | 47.43 | Not Determined | PCB Remediation Waste |
| 481 | BULK | A-303-3 | Seat Cushion | 31.3 | Not Determined | PCB Remediation Waste |
| 500 | BULK | A-217-1 | Seat Cushion from Red-Orange Chair | 17.71 | Not Determined | PCB Remediation Waste |
| 487 | BULK | A-203-4 | Seat Cushion from Leather Chair | 14.58 | Not Determined | PCB Remediation Waste |
| 499 | BULK | A-213-2 | Seat Cushion from Brown Leather Chair | 13 | Not Determined | PCB Remediation Waste |
| 522 | BULK | D-136 | Cushion from Blue Mat | 13 | Not Determined | PCB Remediation Waste |
| 505 | BULK | B-242 | Seat Cushion | 10.65 | Not Determined | PCB Remediation Waste |
| 494 | BULK | A-205-4 | Seat Cushion from Yellow Office Chair | 8.41 | Not Determined | PCB Remediation Waste |
| 512 Dup | BULK | B-242 | Seat Cushion in Windmill Lounge Chair | 6.27 | Not Determined | PCB Remediation Waste |
| 512 | BULK | B-242 | Seat Cushion Windmill Lounge Chair | 6.20 | Not Determined | PCB Remediation Waste |
| 491 Dup | BULK | A-203-4 | Seat Cushion from Leather Chair | 5.596 | Not Determined | PCB Remediation Waste |
| 518 | BULK | A-310-1 | Seat Cushion Brown Leather Chair | 5.50 | Not Determined | PCB Remediation Waste |
| 493 | BULK | A-205-4 | Cushion from Black office Couch | 5.30 | Not Determined | PCB Remediation Waste |
| 491 | BULK | A-203-4 | Seat Cushion from Black Leather Chair | 4.883 | Not Determined | PCB Remediation Waste |
| 136 | BULK | A-205-4 | Couch foam, black couch | 3.809 | Original | PCB Remediation Waste |
| 488 | BULK | A-203-4 | Seat Cushion from Blue Fabric Chair | 3.269 | Not Determined | PCB Remediation Waste |
| 567 | BULK | Auditorium | Auditorium Seat Cushion (redo-513) | 3.09 | Original | PCB Remediation Waste |
| 515 | BULK | D-273 | Auditorium Seat Cushion | 3.08 | Original | PCB Remediation Waste |
| 514 | BULK | D-273 | Auditorium Seat Cushion | 2.93 | Original | PCB Remediation Waste |
| 517 | BULK | D-273 | Auditorium Seat Cushion | 2.59 | Original | PCB Remediation Waste |
| 516 | BULK | D-273 | Auditorium Seat Cushion | 2.44 | Original | PCB Remediation Waste |
| 561 | BULK | Girl's Gym | Cushion from Blue High Jump Mat | 2.26 | Not Determined | PCB Remediation Waste |
| 558 | BULK | Girl's Gym | Cushion from Wrestling Mats | 1.87 | Not Determined | PCB Remediation Waste |
| 559 | BULK | Girl's Gym | Cushion from older Red Wall Mats | 1.59 | Not Determined | PCB Remediation Waste |
| 521 | BULK | D-136 | Cushion from White Mats | 1.26 | Not Determined | PCB Remediation Waste |
| 558 Dup | BULK | Girl's Gym | Cushion from Wrestling Mats | 1.23 | Not Determined | PCB Remediation Waste |
| 519 | BULK | A-318-1 | Seat Cushion from Blue office Chair | 0.721 | Not Determined | Not Regulated |
| 556 | BULK | Boy's Gym | Cushion from Red Wall Mats | <0.962 | Not Determined | Not Regulated |
| 557 | BULK | Boy's Gym | Cushion from Red Folding Gym Mat | <0.859 | Not Determined | Not Regulated |
| 560 | BULK | Girl's Gym | Cushion from Red High Jump Mat | <0.867 | Not Determined | Not Regulated |
| 562 | BULK | Girl's Gym | Cushion from Blue Tumble Mat | <0.890 | Not Determined | Not Regulated |
| 563 | BULK | Girl's Gym | Cushion from Red Mesh Mat | <0.867 | Not Determined | Not Regulated |
| Wall Divider Gaskets | | | | | | |
| 235 | BULK | A-213-1 | Wall divider gasket | 28.5 | Original | Excluded PCB Product |
| 131 | BULK | A-212/213-4 | Wall divider gasket | 26.4 | Original | Excluded PCB Product |
| 328 | BULK | A-310-3 | Wall divider gasket | 12.42 | Original | Excluded PCB Product |
| 340 | BULK | A-311-4 | Wall divider gasket | 10.6 | Original | Excluded PCB Product |
| 340 DUP | BULK | A-311-4 | Wall divider gasket | 10.2 | Original | Excluded PCB Product |
| 243 | BULK | A-311-1 | Wall divider gasket | 9.14 | Original | Excluded PCB Product |
| 370 | BULK | B-253 | Wall divider gasket | 7.76 | Original | Excluded PCB Product |
| Window Caulk | | | | | | |
| 128 | BULK | A-212/213-4 | Window Caulk | 25.1 | Original | Excluded PCB Product |
| 232 | BULK | A-212-4 | Window Caulk | 19.6 | Original | Excluded PCB Product |
| 285 | BULK | A-209-4 | Window Caulk | 17.38 | Original | Excluded PCB Product |
| 374 | BULK | B-211 | Window Caulk | 13 | Original | Excluded PCB Product |
| 361 | BULK | A-309-4 | Window Caulk | 10.58 | Original | Excluded PCB Product |
| 377 | BULK | B-320 | Window Caulk | 9.84 | Original | Excluded PCB Product |
| 338 | BULK | A-316-4 | Window Caulk | 9.04 | Original | Excluded PCB Product |
| 240 | BULK | A-309-1 | Window Caulk | 8.79 | Original | Excluded PCB Product |
| 252 | BULK | A-316-1 | Window Caulk | 5.69 | Original | Excluded PCB Product |
| 341 | BULK | A-311-4 | Window Caulk | 4.896 | Original | Excluded PCB Product |
| 237 | BULK | A-227-1 | Window Caulk | 4.85 | Original | Excluded PCB Product |
| 433 | BULK | D-230 | Window Caulk | 4.71 | Original | Excluded PCB Product |
| 327 | BULK | A-310-3 | Window Caulk | 4.58 | Original | Excluded PCB Product |
| 234 | BULK | A-213-1 | Window Caulk | 4.34 | Original | Excluded PCB Product |
| 263 | BULK | A-306-2 | Window Caulk | 4.203 | Original | Excluded PCB Product |
| 281 | BULK | A-208-4 | Window Caulk | 4.13 | Original | Excluded PCB Product |
| 295 | BULK | A-209-2 | Window Caulk | 4.102 | Original | Excluded PCB Product |
| 277 | BULK | A-110-2 | Window Caulk | 3.834 | Original | Excluded PCB Product |
| 230 | BULK | A-103-1 | Window Caulk | 3.343 | Original | Excluded PCB Product |
| 244 | BULK | A-311-1 | Window Caulk | 3.274 | Original | Excluded PCB Product |
| 111 | BULK | A-205-4 | Window Caulk | 3.209 | Original | Excluded PCB Product |
| 266 | BULK | A-115-2 | Window Caulk | 3.132 | Original | Excluded PCB Product |
| 311 | BULK | A-308-2 | Window Caulk | 3.13 | Original | Excluded PCB Product |
| 384 | BULK | B-344 | Window Caulk | 2.99 | Original | Excluded PCB Product |
| 248 | BULK | A-312-1 | Window Caulk | 2.927 | Original | Excluded PCB Product |
| 257 | BULK | A-309-2 | Window Caulk | 2.84 | Original | Excluded PCB Product |
| 303 | BULK | A-217-3 | Window Caulk | 2.76 | Original | Excluded PCB Product |
| 321 | BULK | A-319-3 | Window Caulk | 2.56 | Original | Excluded PCB Product |
| 260 | BULK | A-312-2 | Window Caulk | 2.454 | Original | Excluded PCB Product |
| 331 | BULK | A-319-4 | Window Caulk | 2.27 | Original | Excluded PCB Product |
| 394 | BULK | D-218 | Window Caulk | 2.013 | Original | Excluded PCB Product |
| 367 | BULK | B-253 | Window Caulk | 2.01 | Original | Excluded PCB Product |
| 120 | BULK | A-311-2 | Window Caulk | 1.741 | Original | Excluded PCB Product |
| 222 | BULK | A-112-1 | Window Caulk | 1.43 | Original | Excluded PCB Product |
| 391 | BULK | D-213 | Window Caulk | 1.397 | Original | Excluded PCB Product |
| 164 | BULK | Exterior | Exterior Window Caulk | 0.848 | Original | Excluded PCB Product |
| 167 | BULK | Exterior | Exterior Window Caulk | 0.597 | Original | Excluded PCB Product |
| 137 | BULK | Exterior | Exterior Window Caulk | 0.334 | Original | Excluded PCB Product |

Table 1
Bulk Product Sample Results
New Bedford High School
New Bedford, MA

| Sample # ¹ | Type of sample | Location | Description | PCB Concentration (mg/kg) | Date Installed | Classification |
|--------------------------|----------------|-------------|-------------------|---------------------------|----------------|----------------------|
| Window Glaze | | | | | | |
| 335 | BULK | A-316-4 | Window Glaze | 24.67 | Original | Excluded PCB Product |
| 127 | BULK | A-212/213-4 | Window Glaze | 22.8 | Original | Excluded PCB Product |
| 386 | BULK | B-344 | Window Glaze | 12.67 | Original | Excluded PCB Product |
| 373 | BULK | B-211 | Window Glaze | 12.12 | Original | Excluded PCB Product |
| 378 | BULK | B-320 | Window Glaze | 11.58 | Original | Excluded PCB Product |
| 373 DUP | BULK | B-211 | Window Glaze | 11.41 | Original | Excluded PCB Product |
| 238 | BULK | A-309-1 | Window Glaze | 10.53 | Original | Excluded PCB Product |
| 368 | BULK | B-253 | Window Glaze | 8.95 | Original | Excluded PCB Product |
| 238 DUP | BULK | A-309-1 | Window Glaze | 8.45 | Original | Excluded PCB Product |
| 251 DUP | BULK | A-316-1 | Window Glaze | 6.8 | Original | Excluded PCB Product |
| 233 | BULK | A-213-1 | Window Glaze | 5.79 | Original | Excluded PCB Product |
| 251 | BULK | A-316-1 | Window Glaze | 5.50 | Original | Excluded PCB Product |
| 278 | BULK | A-110-2 | Window Glaze | 5.35 | Original | Excluded PCB Product |
| 112 | BULK | A-205-4 | Window Glaze | 4.40 | Original | Excluded PCB Product |
| 397 | BULK | D-124 | Window Glaze | 3.952 | Original | Excluded PCB Product |
| 284 | BULK | A-209-4 | Window Glaze | 3.80 | Original | Excluded PCB Product |
| 280 | BULK | A-208-4 | Window Glaze | 3.50 | Original | Excluded PCB Product |
| 256 | BULK | A-309-2 | Window Glaze | 3.456 | Original | Excluded PCB Product |
| 363 | BULK | A-309-4 | Window Glaze | 3.42 | Original | Excluded PCB Product |
| 259 | BULK | A-312-2 | Window Glaze | 3.41 | Original | Excluded PCB Product |
| 241 | BULK | A-311-1 | Window Glaze | 3.30 | Original | Excluded PCB Product |
| 326 | BULK | A-310-3 | Window Glaze | 3.29 | Original | Excluded PCB Product |
| 339 | BULK | A-311-4 | Window Glaze | 3.17 | Original | Excluded PCB Product |
| 229 | BULK | A-103-1 | Window Glaze | 3.161 | Original | Excluded PCB Product |
| 236 | BULK | A-227-1 | Window Glaze | 3.16 | Original | Excluded PCB Product |
| 390 DUP | BULK | D-213 | Window Glaze | 2.554 | Original | Excluded PCB Product |
| 262 | BULK | A-306-2 | Window Glaze | 2.32 | Original | Excluded PCB Product |
| 425 DUP | BULK | D-244 | Window Glaze | 2.292 | Original | Excluded PCB Product |
| 320 | BULK | A-319-3 | Window Glaze | 2.246 | Original | Excluded PCB Product |
| 302 | BULK | A-217-3 | Window Glaze | 2.012 | Original | Excluded PCB Product |
| 121 | BULK | A-311-2 | Window Glaze | 1.98 | Original | Excluded PCB Product |
| 396 | BULK | D-218 | Window Glaze | 1.925 | Original | Excluded PCB Product |
| 217 | BULK | A-112-1 | Window Glaze | 1.89 | Original | Excluded PCB Product |
| 302 DUP | BULK | A-319-3 | Window Glaze | 1.767 | Original | Excluded PCB Product |
| 390 | BULK | D-213 | Window Glaze | 1.755 | Original | Excluded PCB Product |
| 310 | BULK | A-308-2 | Window Glaze | 1.549 | Original | Excluded PCB Product |
| 246 | BULK | A-312-1 | Window Glaze | 1.52 | Original | Excluded PCB Product |
| 332 | BULK | A-319-4 | Window Glaze | 1.299 | Original | Excluded PCB Product |
| 425 | BULK | D-243 | Window Glaze | 1.292 | Original | Excluded PCB Product |
| 294 | BULK | A-209-2 | Window Glaze | 1.20 | Original | Excluded PCB Product |
| 265 | BULK | A-115-2 | Window Glaze | 1.087 | Original | Excluded PCB Product |
| Push-Pin Material | | | | | | |
| 375 | BULK | B-211 | Push-pin Material | 19.3 | Original | Excluded PCB Product |
| 382 | BULK | B-320 | Push-pin Material | 15.48 | Original | Excluded PCB Product |
| 336 | BULK | A-316-4 | Push-pin Material | 12.04 | Original | Excluded PCB Product |
| 286 | BULK | A-209-4 | Push-pin Material | 10.6 | Original | Excluded PCB Product |
| 455 | BULK | A-209-4 | Push-pin Material | 8.77 | Original | Excluded PCB Product |
| 468 | BULK | B-320 | Push-pin Material | 8.71 | Original | Excluded PCB Product |
| 108 | BULK | B-240 | Push-pin Material | 7.53 | Original | Excluded PCB Product |
| 359 | BULK | A-309-4 | Push-pin Material | 7.521 | Original | Excluded PCB Product |
| 249 | BULK | A-316-1 | Push-pin Material | 7.28 | Original | Excluded PCB Product |
| 474 | BULK | B-211 | Push-pin Material | 7.24 | Not Determined | Excluded PCB Product |
| 462 | BULK | A-316-4 | Push-pin Material | 6.38 | Original | Excluded PCB Product |
| 383 | BULK | B-344 | Push-pin Material | 6.02 | Original | Excluded PCB Product |
| 239 | BULK | A-309-1 | Push-pin Material | 5.053 | Original | Excluded PCB Product |
| 261 | BULK | A-306-2 | Push-pin Material | 4.41 | Original | Excluded PCB Product |
| 231 | BULK | A-213-1 | Push-pin Material | 4.2 | Original | Excluded PCB Product |
| 296 | BULK | A-209-2 | Push-pin Material | 3.979 | Original | Excluded PCB Product |
| 247 | BULK | A-312-1 | Push-pin Material | 3.947 | Original | Excluded PCB Product |
| 264 | BULK | A-115-2 | Push-pin Material | 3.71 | Original | Excluded PCB Product |
| 343 | BULK | A-311-4 | Push-pin Material | 3.53 | Original | Excluded PCB Product |
| 225 | BULK | A-117-1 | Push-pin Material | 3.412 | Original | Excluded PCB Product |
| 258 | BULK | A-312-2 | Push-pin Material | 3.31 | Original | Excluded PCB Product |
| 242 | BULK | A-311-1 | Push-pin Material | 3.1 | Original | Excluded PCB Product |
| 255 | BULK | A-309-2 | Push-pin Material | 3.039 | Original | Excluded PCB Product |
| 102 | BULK | A-114-3 | Push-pin Material | 2.97 | Original | Excluded PCB Product |
| 329 | BULK | A-310-3 | Push-pin Material | 2.83 | Original | Excluded PCB Product |
| 333 | BULK | A-319-4 | Push-pin Material | 2.71 | Original | Excluded PCB Product |
| 304 | BULK | A-217-3 | Push-pin Material | 2.589 | Original | Excluded PCB Product |
| 366 | BULK | B-226 | Push-pin Material | 2.482 | Original | Excluded PCB Product |
| 398 | BULK | D-124 | Push-pin Material | 2.478 | Original | Excluded PCB Product |
| 218 | BULK | A-112-1 | Push-pin Material | 2.474 | Original | Excluded PCB Product |
| 324 | BULK | A-319-3 | Push-pin Material | 2.38 | Original | Excluded PCB Product |
| 279 | BULK | A-110-2 | Push-pin Material | 2.136 | Original | Excluded PCB Product |
| 271 | BULK | A-116-4 | Push-pin Material | 2.123 | Original | Excluded PCB Product |
| 313 | BULK | A-308-2 | Push-pin Material | 1.94 | Original | Excluded PCB Product |
| 389 | BULK | D-213 | Push-pin Material | 1.701 | Original | Excluded PCB Product |
| 395 | BULK | D-218 | Push-pin Material | 1.58 | Original | Excluded PCB Product |
| 405 | BULK | D-143 | Push-pin Material | 1.383 | Original | Excluded PCB Product |
| 454 | BULK | A-209-4 | Push-pin Mastic | 0.476 | Original | Excluded PCB Product |
| 461 | BULK | A-316-4 | Push-pin Mastic | 0.233 | Original | Excluded PCB Product |
| 400 | BULK | C-216 | Push-pin Material | <0.46 | Original | Excluded PCB Product |
| 467 | BULK | B-320 | Push-pin Mastic | <0.195 | Original | Excluded PCB Product |
| Vinyl Cove Base | | | | | | |
| 105 | BULK | B-240 | Vinyl cove base | 7.84 | Original | Excluded PCB Product |
| 101 | BULK | A-114-3 | Vinyl cove base | 3.67 | Original | Excluded PCB Product |
| 130 | BULK | A-212/213-4 | Vinyl cove base | 1.78 | Original | Excluded PCB Product |

Table 1
Bulk Product Sample Results
New Bedford High School
New Bedford, MA

| Sample # ¹ | Type of sample | Location | Description | PCB Concentration (mg/kg) | Date Installed | Classification |
|------------------------|----------------|-------------------|-------------------------------------|---------------------------|----------------|----------------------|
| Joint Materials | | | | | | |
| 540 | BULK | B-230 | Gray Joint Sealant / White Paint | 41.7 | Original | Excluded PCB Product |
| 149 | BULK | Roof | Flashing joint patch near chimney | 7.06 | New | Excluded PCB Product |
| 140 | BULK | Boiler Room | Adhesive around joints (north side) | 6.25 | Original | Excluded PCB Product |
| 541 | BULK | Faculty Base Room | Gray Joint Sealant | 3.714 | Original | Excluded PCB Product |
| 533 | BULK | Muralled Lobby | Gray Join Sealant / Yellow Paint | 3.548 | Original | Excluded PCB Product |
| 539 | BULK | A-211-4 | Gray Joint Sealant / Blue Paint | 2.675 | Original | Excluded PCB Product |
| 536 | BULK | B-354 | Gray Joint Sealant / L. Green Paint | 2.654 | Original | Excluded PCB Product |
| 532 | BULK | C Block Hall | Gray Join Sealant / No Paint | 2.512 | Original | Excluded PCB Product |
| 533 Dup | BULK | Muralled Lobby | Gray Join Sealant / Yellow Paint | 2.45 | Original | Excluded PCB Product |
| 534 | BULK | Main Lobby | Brown Joint Sealant | 2.306 | Original | Excluded PCB Product |
| 525 | BULK | B-265 | Gray Join Sealant / White Paint | 2.186 | Original | Excluded PCB Product |
| 538 | BULK | B-Block Hall | Gray Joint Sealant | 2.18 | Original | Excluded PCB Product |
| 537 | BULK | A-304-2 | Gray Joint Sealant / Yellow Paint | 1.923 | Original | Excluded PCB Product |
| 531 | BULK | 1st floor Hall | Gray Joint Sealant / Green Paint | 1.78 | Original | Excluded PCB Product |
| 588 | BULK | D-216 | Joint Sealant | 1.647 | Original | Excluded PCB Product |
| 501 | BULK | A-217-1 | Gray Joint Sealant / Green Paint | 1.43 | Original | Excluded PCB Product |
| 535 | BULK | A-310-4 | Gray Joint Sealant / Blue Paint | 1.36 | Original | Excluded PCB Product |
| 589 | BULK | D-213 | Joint Sealant | 1.257 | Original | Excluded PCB Product |
| 146 | BULK | Boiler Room | Expansion joint | 1.124 | Original | Excluded PCB Product |
| 496 | BULK | A-213-2 | Gray Join Sealant / Yellow Paint | 0.993 | Original | Excluded PCB Product |
| 496 Dup | BULK | A-213-2 | Gray Joint Sealant / Yellow Paint | 0.943 | Original | Excluded PCB Product |
| 145 | BULK | Boiler Room | Flue joint material | 0.734 | Original | Excluded PCB Product |
| 584 | BULK | A-303-3 | Joint Sealant | 0.667 | Original | Excluded PCB Product |
| 154 | BULK | Exterior | Expansion joint stuffing | 0.375 | Original | Excluded PCB Product |
| 166 | BULK | Exterior | Exterior Door Caulk | 0.158 | Original | Excluded PCB Product |
| 152 | BULK | C-Block | Interior expansion joint stuffing | <0.146 | Original | Excluded PCB Product |
| Carpet | | | | | | |
| 158 | BULK | D-219 | Green carpet, fine arts office | 15.37 | Not Determined | Excluded PCB Product |
| 156 | BULK | D-250 | Red carpet little theater | 3.652 | Not Determined | Excluded PCB Product |
| 511 | BULK | D-250 | Carpet Cushion under Red Carpet | 2.55 | Not Determined | Excluded PCB Product |
| 155 | BULK | D-237 | Blue carpet from auditorium | 1.717 | Not Determined | Excluded PCB Product |
| 162 | BULK | B-292 | Brown carpet, media room | 1.525 | Not Determined | Excluded PCB Product |
| 161 | BULK | B-275 | Brown carpet, library office | 1.434 | Not Determined | Excluded PCB Product |
| 163 | BULK | B-375 | Green carpet, science media center | 1.398 | Not Determined | Excluded PCB Product |
| 160 | BULK | main office | Light brown carpet | 1.01 | Not Determined | Excluded PCB Product |
| 159 | BULK | D-208 | Blue/tan carpet glued to vinyl tile | <1.06 | Not Determined | Excluded PCB Product |
| 157 | BULK | D-250 | Carpet pad, little theater | <0.176 | Not Determined | Excluded PCB Product |
| Mastics | | | | | | |
| 132 | BULK | A-212/213-4 | Tile gaps (floor mastic) | 32.51 | Original | Excluded PCB Product |
| 107 | BULK | B-240 | Floor tile mastic | 10 | Original | Excluded PCB Product |
| 352 | BULK | A-316-1 | Vinyl Cove Base Mastic | 5.19 | Original | Excluded PCB Product |
| 410 | BULK | D-115 | Vinyl Cove Base Mastic | 3.75 | Original | Excluded PCB Product |
| 228 | BULK | A-117-1 | Vinyl Cove Base Mastic | 3.73 | Original | Excluded PCB Product |
| 446 | BULK | A-114-3 | Vinyl Cove Base Mastic, soft, white | 3.72 | Original | Excluded PCB Product |
| 268 | BULK | A-115-2 | Vinyl Cove Base Mastic | 3.56 | Original | Excluded PCB Product |
| 124 | BULK | A-311-2 | Tile gaps (floor mastic) | 3.33 | Original | Excluded PCB Product |
| 115 | BULK | A-205-4 | Vinyl Cove Base Mastic | 3.03 | Original | Excluded PCB Product |
| 287 | BULK | A-209-4 | Vinyl Cove Base Mastic | 2.751 | Original | Excluded PCB Product |
| 224 | BULK | A-112-1 | Vinyl Cove Base Mastic | 2.64 | Original | Excluded PCB Product |
| 276 | BULK | A-110-2 | Vinyl Cove Base Mastic | 2.58 | Original | Excluded PCB Product |
| 372 | BULK | B-211 | Vinyl Cove Base Mastic | 2.355 | Original | Excluded PCB Product |
| 207 | BULK | A-213-4 | Floor tile mastic | 1.906 | Original | Excluded PCB Product |
| 118 | BULK | A-205-4 | Tile gaps (floor mastic) | 1.849 | Original | Excluded PCB Product |
| 350 | BULK | A-309-1 | Vinyl Cove Base Mastic | 1.791 | Original | Excluded PCB Product |
| 308 | BULK | A-223-3 | Vinyl Cove Base Mastic | 1.71 | Original | Excluded PCB Product |
| 318 | BULK | A-312-2 | Vinyl Cove Base Mastic | 1.54 | Original | Excluded PCB Product |
| 213 | BULK | A-311-2 | Floor tile mastic | 1.493 | Original | Excluded PCB Product |
| 270 | BULK | A-116-4 | Vinyl Cove Base Mastic | 1.37 | Original | Excluded PCB Product |
| 253 | BULK | A-312-1 | Vinyl Cove Base Mastic | 1.36 | Original | Excluded PCB Product |
| 214 | BULK | A-311-2 | Vinyl Cove Base Mastic | 1.34 | Original | Excluded PCB Product |
| 298 | BULK | A-207-2 | Vinyl Cove Base Mastic | 1.331 | Original | Excluded PCB Product |
| 202 | BULK | B-240 | Vinyl Cove Base Mastic | 1.308 | Original | Excluded PCB Product |
| 290 | BULK | A-227-4-O | Vinyl Cove Base Mastic | 1.19 | Original | Excluded PCB Product |
| 356 | BULK | A-311-1 | Vinyl Cove Base Mastic | 1.16 | Original | Excluded PCB Product |
| 306 | BULK | A-217-3 | Vinyl Cove Base Mastic | 1.08 | Original | Excluded PCB Product |
| 208 | BULK | A-213-4 | Vinyl Cove Base Mastic | 1.02 | Original | Excluded PCB Product |
| 201 | BULK | B-240 | Floor tile mastic | 0.954 | Original | Excluded PCB Product |
| 301 | BULK | A-209-2 | Vinyl Cove Base Mastic | 0.927 | Original | Excluded PCB Product |
| 292 | BULK | A-206-4 | Vinyl Cove Base Mastic | 0.923 | Original | Excluded PCB Product |
| 362 | BULK | A-309-4 | Vinyl Cove Base Mastic | 0.899 | Original | Excluded PCB Product |
| 388 | BULK | B-373 | Vinyl Cove Base Mastic | 0.896 | Original | Excluded PCB Product |
| 129 | BULK | A-212/213-4 | Vinyl Cove Base Mastic | 0.853 | Original | Excluded PCB Product |
| 322 | BULK | A-319-3 | Vinyl Cove Base Mastic | 0.828 | Original | Excluded PCB Product |
| 346 | BULK | A-227-1 | Vinyl Cove Base Mastic | 0.728 | Original | Excluded PCB Product |
| 123 | BULK | A-311-2 | Vinyl Cove Base Mastic | 0.728 | Original | Excluded PCB Product |
| 110 | BULK | A-114-3 | Floor tile mastic | 0.694 | Original | Excluded PCB Product |
| 315 | BULK | A-308-2 | Vinyl Cove Base Mastic | 0.652 | Original | Excluded PCB Product |
| 379 | BULK | B-320 | Vinyl Cove Base Mastic | 0.632 | Original | Excluded PCB Product |
| 399 | BULK | D-124 | Vinyl Cove Base Mastic | 0.592 | Original | Excluded PCB Product |
| 430 | BULK | A-309-2 | Vinyl Cove Base Mastic | 0.56 | Original | Excluded PCB Product |
| 402 | BULK | C-216 | Vinyl Cove Base Mastic | 0.547 | Original | Excluded PCB Product |
| 282 | BULK | A-208-4 | Vinyl Cove Base Mastic | 0.517 | Original | Excluded PCB Product |
| 418 DUP | BULK | Stairs | Vinyl Cove Base Mastic | 0.494 | Original | Excluded PCB Product |
| 427 | BULK | Prep Room | Vinyl Cove Base Mastic | 0.483 | Original | Excluded PCB Product |
| 364 | BULK | B-226 | Vinyl Cove Base Mastic | 0.412 | Original | Excluded PCB Product |
| 424 | BULK | D-243 | Vinyl Cove Base Mastic | 0.382 | Original | Excluded PCB Product |
| 412 | BULK | D-301 | Vinyl Cove Base Mastic | 0.343 | Original | Excluded PCB Product |
| 403 | BULK | D-143 | Vinyl Cove Base Mastic | 0.307 | Original | Excluded PCB Product |
| 408 | BULK | D-111 | Vinyl Cove Base Mastic | 0.286 | Original | Excluded PCB Product |
| 423 | BULK | A-114-4 | Vinyl Cove Base Mastic | <2.37 | Original | Excluded PCB Product |
| 421 | BULK | B-287 | Vinyl Cove Base Mastic | <0.248 | Original | Excluded PCB Product |
| 418 | BULK | Stairs | Vinyl Cove Base Mastic | <0.243 | Original | Excluded PCB Product |
| 415 | BULK | C-211 | Vinyl Cove Base Mastic | <0.21 | Original | Excluded PCB Product |

**Table 1
Bulk Product Sample Results
New Bedford High School
New Bedford, MA**

| Sample # ¹ | Type of sample | Location | Description | PCB Concentration (mg/kg) | Date Installed | Classification |
|--|----------------|-------------|---------------------------------|---------------------------|----------------|----------------------|
| Other Building Materials | | | | | | |
| 475 | BULK | B-116 | Cork-type pipe wrap | 4.66 | Original | Excluded PCB Product |
| 476 | BULK | B-116 | Foam-type pipe wrap | 2.03 | Original | Excluded PCB Product |
| 142 | BULK | Boiler Room | Air handler door insulation | 0.826 | Original | Excluded PCB Product |
| 150 | BULK | Roof | Roof Edge Patch by chimney | <0.05 | New | Excluded PCB Product |
| Tile | | | | | | |
| 106 | BULK | B-240 | Vinyl tile, brown | 2.558 | Original | Excluded PCB Product |
| 125 | BULK | A-311-2 | Vinyl tile | 1.182 | Original | Excluded PCB Product |
| 119 | BULK | A-205-4 | Vinyl tile, blue | 0.388 | Original | Excluded PCB Product |
| 103 | BULK | A-114-3 | Vinyl tile | 0.176 | Original | Excluded PCB Product |
| Wallboard | | | | | | |
| 443 | BULK | A-213-4 | Wallboard under paint | 0.362 | Original | Excluded PCB Product |
| 445 | BULK | A-205-4 | Wallboard under paint | 0.344 | Original | Excluded PCB Product |
| 206 | BULK | B-240 | Wallboard under cove base | 0.2172 | Original | Excluded PCB Product |
| 431 | BULK | A-309-2 | Wallboard under cove base | 0.162 | Original | Excluded PCB Product |
| 441 | BULK | A-311-2 | Wallboard under paint | 0.133 | Original | Excluded PCB Product |
| 209 | BULK | A-213-4 | Wallboard under cove base | 0.271 | Original | Excluded PCB Product |
| 447 | BULK | A-114-3 | Wallboard under cove base | <0.0893 | Original | Excluded PCB Product |
| 215 | BULK | A-311-2 | Wallboard under cove base | <0.05 | Original | Excluded PCB Product |
| Concrete | | | | | | |
| 245 | BULK | A-212-4 | Concrete (0 - 0.5") | 1.247 | Original | Not Regulated |
| 436 | BULK | A-212-4 | Concrete (0.5 - 1") | 0.327 | Original | Not Regulated |
| 434 | BULK | A-205-4 | Concrete (0 - 0.5") | 0.198 | Original | Not Regulated |
| 593 | BULK | A-319-3 | Concrete (0 - 0.5") | 0.179 | Original | Not Regulated |
| 203 | BULK | B-240 | Concrete (0 - 0.5") | 0.113 | Original | Not Regulated |
| 590 | BULK | A-206-4 | Concrete (0 - 0.5") | <0.0500 | Original | Not Regulated |
| 591 | BULK | A-206-4 | Concrete (0.5 - 1") | <0.0500 | Original | Not Regulated |
| 592 | BULK | A-206-4 | Concrete (1 - 1.5") | <0.0791 | Original | Not Regulated |
| 594 | BULK | A-319-3 | Concrete (0.5 - 1") | <0.0500 | Original | Not Regulated |
| 595 | BULK | A-319-3 | Concrete (1 - 1.5") | <0.0599 | Original | Not Regulated |
| 221 | BULK | A-311-2 | Concrete (1 - 1.5") | <0.10 | Original | Not Regulated |
| 211 | BULK | A-213-4 | Concrete (0.5 - 1") | <0.0993 | Original | Not Regulated |
| 205 | BULK | B-240 | Concrete (1 - 1.5") | <0.0988 | Original | Not Regulated |
| 204 | BULK | B-240 | Concrete (0.5 - 1") | <0.0985 | Original | Not Regulated |
| 212 | BULK | A-213-4 | Concrete (1 - 1.5") | <0.0983 | Original | Not Regulated |
| 435 | BULK | A-205-4 | Concrete (0.5 - 1") | <0.098 | Original | Not Regulated |
| 220 | BULK | A-311-2 | Concrete (0.5 - 1") | <0.0976 | Original | Not Regulated |
| 438 | BULK | A-209-2 | Concrete (0.5 - 1") | <0.0956 | Original | Not Regulated |
| 437 | BULK | A-209-2 | Concrete (0 - 0.5") | <0.0871 | Original | Not Regulated |
| 210 | BULK | A-213-4 | Concrete (0 - 0.5") | <0.0511 | Original | Not Regulated |
| 219 | BULK | A-311-2 | Concrete (0 - 0.5") | <0.05 | Original | Not Regulated |
| Wipe Samples | | | | | | |
| 138 | WIPE | Boiler Room | Bearing lube wipe, air handler | 7.07 | Original | Not Regulated |
| 139 | WIPE | Boiler Room | Johnson controls floor wipe | 2.307 | Original | Not Regulated |
| 151 | WIPE | A-207-1 | Pneumatic panel, 2nd floor wipe | 1.55 | Original | Not Regulated |
| 144 | WIPE | Boiler Room | West compressor wipe | 1.53 | Original | Not Regulated |
| 141 | WIPE | Boiler Room | Electric motor wipe sample | 1.349 | Original | Not Regulated |
| 143 | WIPE | Boiler Room | East compressor wipe | <0.5 | Original | Not Regulated |
| 153 | WIPE | Boiler Room | Wipe inside of GE control panel | <0.5 | Original | Not Regulated |
| 165 | WIPE | Exterior | Wipe Inside Univent | <0.5 | Original | Not Regulated |
| <p>Notes: Units for total PCB Concentrations presented are mg/kg for wipe samples which are ug/100cm². Total PCB Concentrations in BOLD exceed 50 mg/kg. Reported sample results highlighted in green represent materials that have already been removed from the building. Reported sample results highlighted in blue represent materials that are scheduled for removal from the building in summer 2010. Reported sample results highlighted in orange represent materials that are scheduled for removal from the building in summer 2011.</p> | | | | | | |

Table 2
Classifications of PCB-Containing Building Materials and Planned Activities
New Bedford High School
New Bedford, MA

| Material | Location | Occupancy Status ¹ | Accessibility ² | Planned Activity |
|------------------------------------|-----------------------------|-------------------------------|----------------------------|---|
| PCB Bulk Product Wastes | | | | |
| Univent Coatings | B-Block univents only | High | High | Removal and replacement of univents in summer 2010 |
| Laminate adhesive | A-203-4 | High | High | Removal and replacement of cabinets and casework in summer 2010 |
| Paint (limited area) | B-230, A-211-3, and A-213-4 | High | High | Removal and replacement of painted wallboard in summer 2010 |
| PCB Remediation Wastes | | | | |
| Couch/upholstrey foam | Throughout Buildings | Low to High (varies) | Low to High (varies) | Removal and replacement of materials in summer 2010 and 2011 |
| Excluded PCB Products | | | | |
| Wall divider gasket | Throughout Buildings | High | Low | Maintenance Measures (see Table 3) |
| Paint | Throughout Buildings | High | High | |
| Window glazing | Throughout Buildings | High | High | |
| Window caulking | Throughout Buildings | High | High | |
| Push Pin Material | Classrooms | High | High | |
| Vinyl cove base | Throughout Buildings | Low to High (varies) | Low | |
| Joint Materials | Throughout Buildings | Low to High (varies) | Low | |
| Carpet | Throughout Buildings | High to medium | High | |
| Laminate adhesive | Throughout Buildings | High | Low | |
| Mastics | Throughout Buildings | Low to High (varies) | Low | |
| Other Bldg. Materials ³ | Throughout Buildings | Low to High (varies) | Low to High (varies) | |
| Tile | Throughout Buildings | High | High | |
| Wallboard | Throughout Buildings | Low to High (varies) | Low to High (varies) | |
| Concrete | Throughout Buildings | High | High | |

Note:

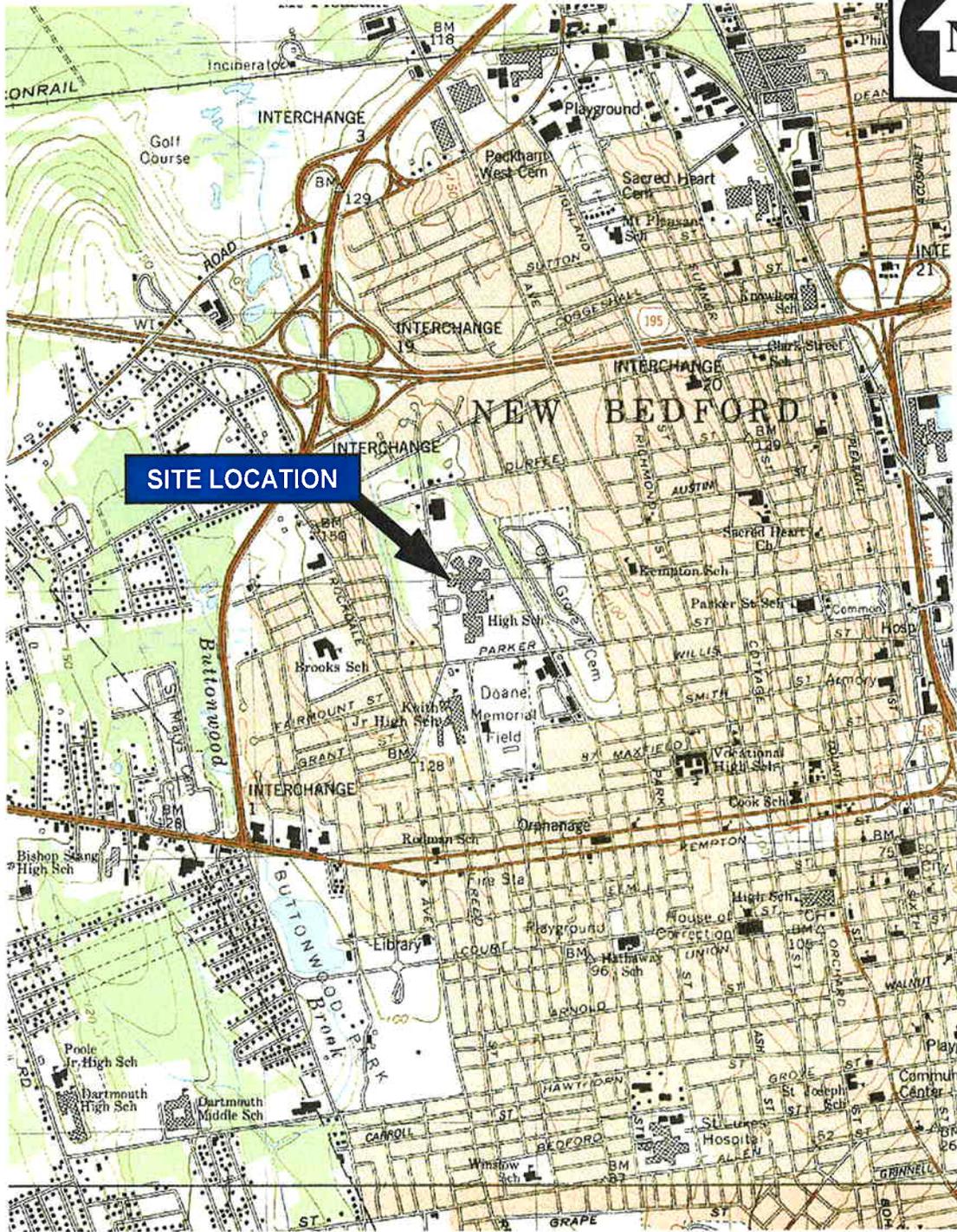
- 1 - Occupancy judged qualitatively based on building use patterns that were researched through consultations with facility personne and direct observation during visits.
- 2 - The Accessibility rating took into account the potential for building occupants to contact PCB-containing building material directly or indirectly via the air handling system.
- 3 - Includes insulation, pipe wrap, roofing materials and patch repairs.

**Table 3
Maintenance Measures for Excluded PCB Products
New Bedford High School
New Bedford, MA**

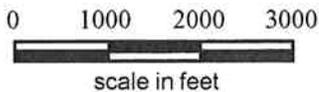
| Material | Sample Count/ Non-Detects | Maximum (mg/kg) | Minimum (mg/kg) | Average (mg/kg) | Encapsulation Methods | Potential Removal Actions | Priority | Comments |
|-----------------------|------------------------------|--------------------|--------------------|--------------------|--|---|---|--|
| Wall divider gasket | 7/0 | 28.5 | 7.76 | 15 | None | Remove gasket, scrape area clean, replace with new. | High due to concentrations observed. | A program to remove and replace all existing gaskets to be implemented over the next three years. |
| Paint | 72/0 | 17.81 | 0.025 | 6.6 | Paint over surfaces | None | Medium due to concentrations observed but wipe tests performed on painted surfaces to remain indicate that PCB concentrations are non-detect. | An annual inspection program to be instituted that evaluates condition of paint and removes that which is flaking and chipping to be implemented. In addition, 10 to 20 wipe samples to be performed annually at random locations throughout the buildings to evaluate effectiveness of encapsulation with additional paint to be applied to when analytical results are $\geq 1.0 \mu\text{g}/100 \text{ cm}^2$. |
| Window caulking | 38/0 | 25.1 | 0.334 | 5.4 | Seal with new caulk | Remove caulk, scrape area clean, replace with new. | Medium due to concentrations observed. | An annual inspection program to be instituted that evaluates condition of caulk and removes and replaces that which is flaking and chipping to be implemented. |
| Window glazing | 41/0 | 24.67 | 1.087 | 5.3 | Seal with new glazing | Remove glazing, scrape area clean, replace with new. | Medium due to concentrations observed. | An annual inspection program to be instituted that evaluates condition of glazing and removes and replaces that which is flaking and chipping to be implemented. |
| Push Pin Materials | 41/2 | 19.3 | <0.195 | 4.7 | None | Remove and replace with new. | Medium due to concentrations observed and presence in classrooms. | A program to remove and replace all existing push pin materials to be implemented over the next five years. |
| Vinyl cove base | 3/0 | 7.84 | 1.78 | 4.4 | None | Remove and replace with new. | Low due to concentrations observed. | An annual inspection program to be instituted that evaluates condition of vinyl cove base and removes and replaces that which is found in poor condition. See Mastics entry for more details. |
| Joint Materials | 26/1 | 41.7 | <0.146 | 3.6 | None | Remove materials from construction joints, scrape area clean, replace with new. | Medium due to concentrations observed. | An annual inspection program to be instituted that evaluates condition of joint materials and removes and replaces that which is found in poor condition. |
| Carpet | 10/0 | 15.37 | <0.176 | 3 | None | Remove and replace with new. | Low due to concentrations observed. | Carpets to be replaced when found in poor condition. |
| Laminate adhesive | 66/30 | 13.5 | <0.158 | 2.5 | Repair laminate surface when adhesive is exposed. | Scrape area clean, replace with new. | Low due to concentrations observed and low probability of exposure unless the adhesive is exposed. | Cabinets with laminate adhesives to be replaced when found in poor condition. |
| Mastics | 55/4 | 32.51 | <0.21 | 2.1 | Replace tile or cove base when mastics are exposed | Scrape or grind area clean, replace with new. | Low due to concentrations observed and low probability of exposure unless the mastic is exposed. | An annual inspection program to be instituted that evaluates condition of vinyl cove base and tile and removes and replaces that which is found in poor condition. Mastics on wallboard can be completely removed by scraping. Mastics on concrete floors may need grinding to completely remove. Any grinding should be done with HEPA filtration equipped grinding tools. |
| Other Bldg. Materials | 4/1 | 4.66 | <0.05 | 1.9 | None | As needed. | Low due to concentrations observed. | Other building materials to be replaced when found in poor condition. |
| Tile | 4/0 | 2.558 | 0.176 | 1.1 | None | Remove and replace with new. | Low due to concentrations observed. | An annual inspection program to be instituted that evaluates condition of tile and removes and replaces that which is found in poor condition. See Mastics entry for more details. |
| Wallboard | 8/2 | 0.362 | <0.05 | 0.19 | Paint over surfaces | Wallboard can be removed during renovation projects if needed. | Very low | No inspection or removal program proposed. |
| Concrete | 21/16 | 1.247 | <0.05 | 0.13 | None | None | Very low | No inspection or removal program proposed. |

Notes: Sample counts, maximums, and averages do not include analytical data for materials that are scheduled to be removed.
Averages calculated using half the reporting limit for non-detect analytical results
Other Bldg. Materials includes roofing, insulation, and pipe wrap materials

FIGURES



BASE MAP IS A PORTION OF THE FOLLOWING 7.5' X 15' USGS TOPOGRAPHIC QUADRANGLES: NEW BEDFORD NORTH, MA, 1979; NEW BEDFORD SOUTH, MA 1977



QUADRANGLE LOCATION

**NEW BEDFORD HIGH SCHOOL
NEW BEDFORD, MASSACHUSETTS**

SITE LOCATION MAP



Wannalancit Mills
650 Suffolk Street
Lowell, MA 01854
978-970-5600

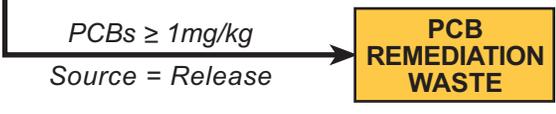
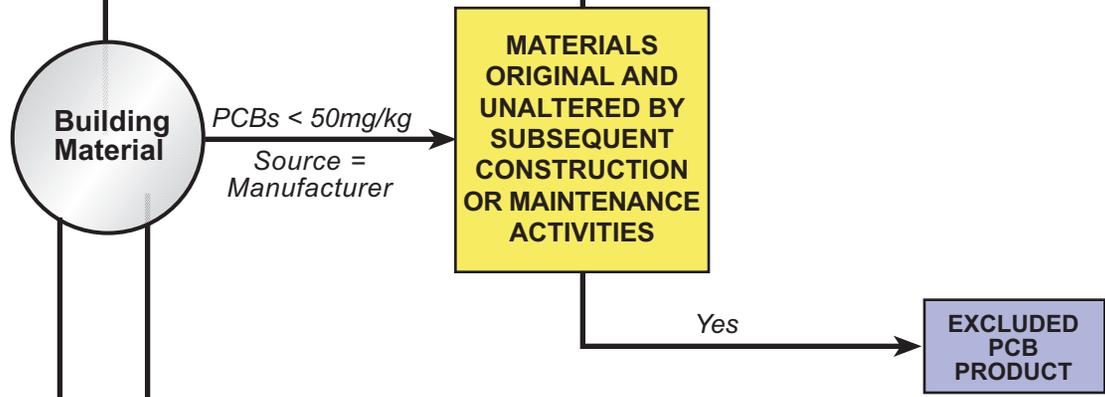
**FIGURE
1**

Drawn: HWB

SCALE: AS SHOWN

Checked: DS

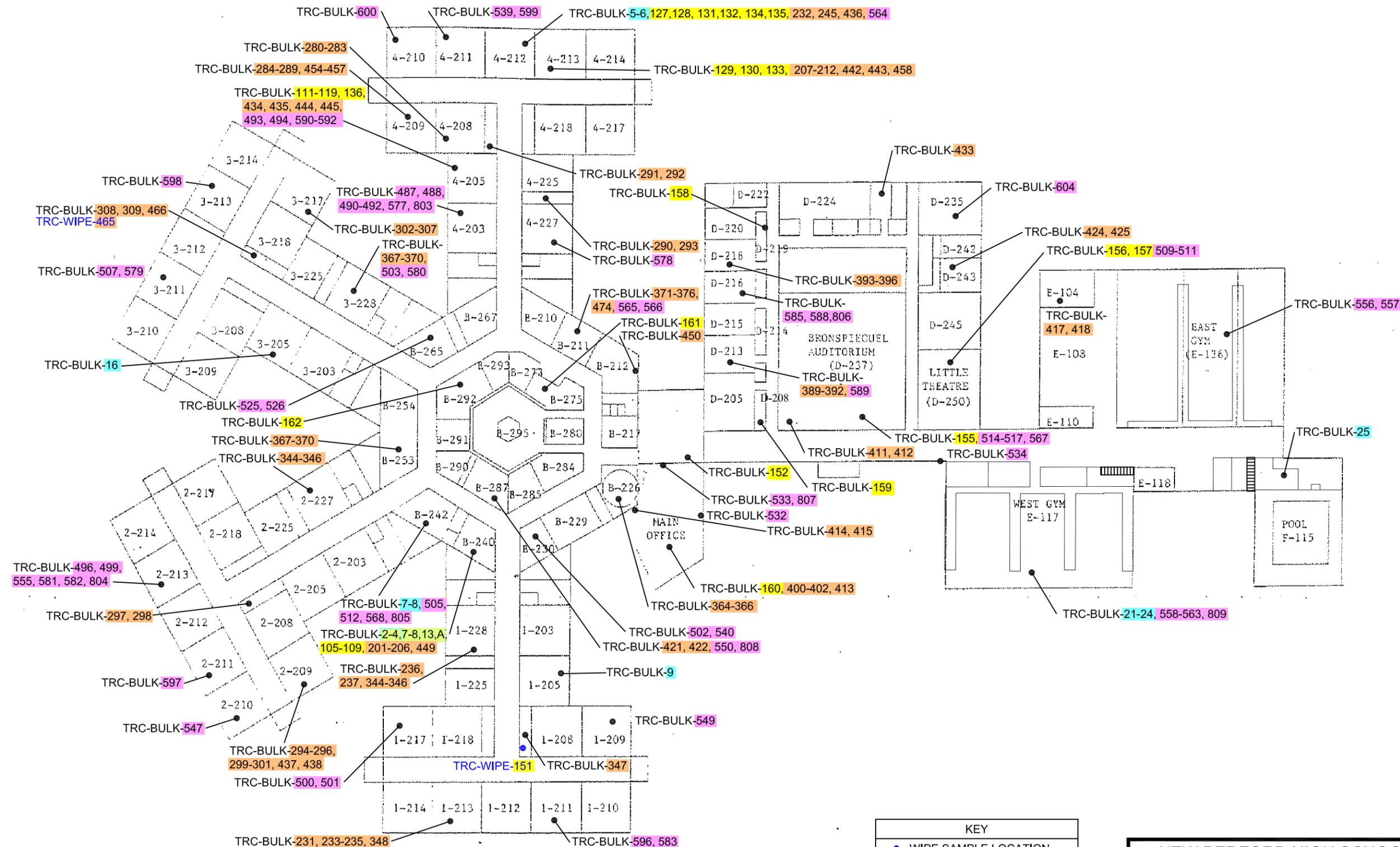
Date: OCT 2008



**NEW BEDFORD HIGH SCHOOL
230 HATHAWAY BLVD
NEW BEDFORD, MASSACHUSETTS**

BUILDING MATERIAL REMOVAL AND ABATEMENT DECISION FLOWCHART

| | | |
|---|--|---------------------|
|  | Wannalancit Mills 650 Suffolk St. Lowell, MA 01854 (978) 970-5600 | FIGURE 2 |
| | DRAWN BY: JW CHECKED BY: MB | |



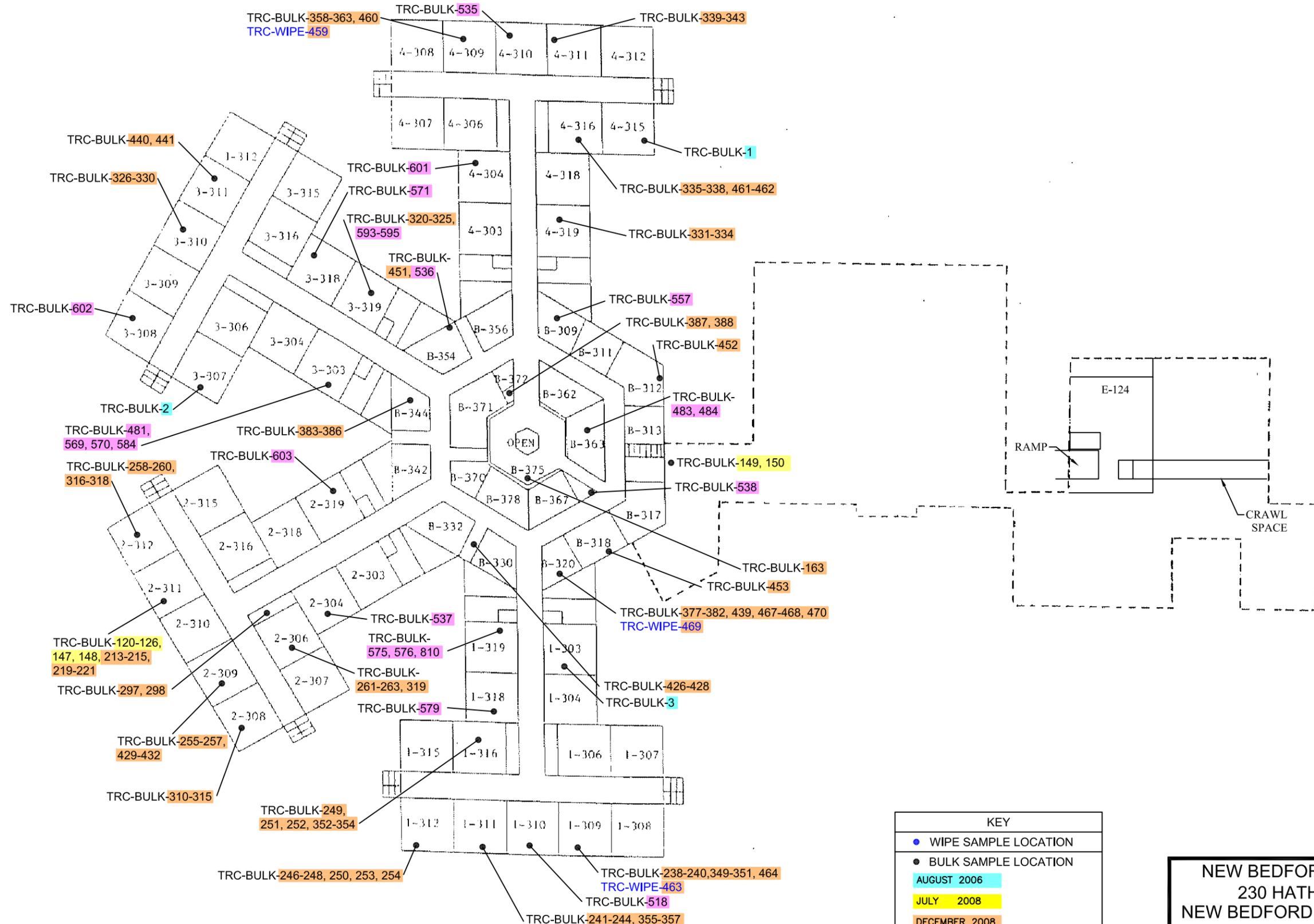
| KEY | |
|-----|----------------------|
| ● | WIPE SAMPLE LOCATION |
| ● | BULK SAMPLE LOCATION |
| ● | AUGUST 2006 |
| ● | AUGUST 2007 |
| ● | JULY 2008 |
| ● | DECEMBER 2008 |
| ● | AUGUST 2009 |

ALL LOCATIONS ARE APPROXIMATE

NEW BEDFORD HIGH SCHOOL
 230 HATHAWAY BLVD
 NEW BEDFORD, MASSACHUSETTS

A-D BLOCK SAMPLING
 SECOND FLOOR

| | |
|--|----------------------------|
| <p style="font-size: small; margin-top: 5px;">Wannalancit Mills 650 Suffolk Street Lowell, MA 01854 (978) 970-5600</p> | <p>FIGURE 4</p> |
| DRAWN BY: HWB CHECKED BY: AW | DATE: OCT 2009 |



| KEY | |
|-----|----------------------|
| ● | WIPE SAMPLE LOCATION |
| ● | BULK SAMPLE LOCATION |
| ■ | AUGUST 2006 |
| ■ | JULY 2008 |
| ■ | DECEMBER 2008 |
| ■ | AUGUST 2009 |

ALL LOCATIONS ARE APPROXIMATE

NEW BEDFORD HIGH SCHOOL
 230 HATHAWAY BLVD
 NEW BEDFORD, MASSACHUSETTS

A & B BLOCK SAMPLING
 THIRD FLOOR

TRC Wannalancit Mills
 650 Suffolk Street
 Lowell, MA 01854
 (978) 970-5600

DRAWN BY: HWB
 CHECKED BY: AW

DATE:
 OCT 2009

FIGURE
 5