



August 14, 2013

Mr. Peter Ramanauskas
U.S. Environmental Protection Agency Region 5
77 W. Jackson Blvd.
LU-9J
Chicago, IL 60604

RE: Addendum #2 to Work Plan for the Investigation of the Soil Stockpile and the Southwest Corner
RACER Trust Property – Toledo, Ohio

Dear Mr. Ramanauskas:

This letter presents the second addendum to the Work Plan for the Investigation of the Soil Stockpile and the Southwest Corner to be conducted at the RACER Trust Property (Site) in Toledo, OH.

SOUTHWEST CORNER – PROPOSED EXCAVATION

Based upon the data gathered from the first and second rounds of investigation of the Southwest Corner, RACER will excavate and dispose PCB impacted soils.

PCB results for BH258-11 indicated total PCBs at 1,800 mg/kg in the 0-4 foot below ground surface (bgs) interval. Eight “step-out” borings were installed around BH258-11 to delineate the area of PCB impacted soils. Based upon the results of the “step-out” borings, the area has been delineated.

The area of impact is centered on BH258-11 and covers an area approximately 20' X 20' X 4' deep. RACER will excavate the entire area (encompassing BH270-12 through BH273-12), collect confirmatory samples, and backfill the excavation.

Confirmatory samples will be collected from each side wall and the bottom of the excavation and analyzed for PCBs. For each side wall confirmatory sample, three grab samples will be

collected at approximately 2-3 feet bgs and composited into one sample for analysis. For the bottom confirmatory sample, five grab samples will be collected and composited into one sample for analysis. Therefore, a total of 5 composite samples will be sent to TestAmerica in North Canton, OH and analyzed for PCBs. A target level of <25 mg/kg Total PCBs has been set for this area of excavation. If Total PCBs for all samples are less than 25 mg/kg then the remediation is considered complete.

All excavated soil will be disposed as TSCA material (>50 ppm). The area will be backfilled with crushed stone and restored to its previous condition.

Conestoga-Rovers and Associates, Inc. (CRA) will complete the field activities and will follow the approved Work Plan for Investigation of the Soil Stockpile and the Southwest Corner unless otherwise specified above.

Should you have any questions on the above, please do not hesitate to contact me.

Yours truly,

A handwritten signature in cursive script that reads "Pamela L. Barnett". The signature is written in black ink on a light-colored background.

Pamela L. Barnett P.G.

Assemble Region Cleanup Manager (DE, LA, MA, OH, PA, VA)

RACER Trust