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

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

APR 03 2014

Mr. Tom Cullen
Fairfield Board of Education
501 Kings Highway East
Fairfield, Connecticut 06825

Re: PCB Cleanup and Risk-Based Disposal Approval under 40 CFR §§ 761.61(a) and (c) and § 761.79(h)
Osborn Hill Elementary School
Fairfield, Connecticut

Dear Mr. Cullen:

This is in response to the Notification[1] by the Town of Fairfield ("the Town") for the Board of Education for approval of a cleanup and risk-based disposal plan to address PCB contamination at the Osborne Hill Elementary School ("the Site") located at 760 Stillson Avenue in Fairfield, Connecticut. The Site contains PCB-contaminated materials that exceed the allowable PCB levels under 40 CFR § 761.20(a), § 761.61, and § 761.62.

The Town has proposed a PCB abatement plan under 40 CFR §§ 761.61(a) and (c), § 761.79(h), and § 761.62 that includes the following activities:

A. Gymnasium and Hallway

- Remove caulk with greater than or equal to ("≥") 50 parts per million ("ppm") in the gymnasium, associated *non-porous surfaces* (i.e., doors frames), and adjacent *porous surfaces* (i.e., concrete masonry units ("CMU") to a minimum 12-inch distance from the caulk) and dispose as a *PCB bulk product waste* in accordance with § 761.62;

- Remove paint from CMU (gymnasium and hallway) and dispose as a *PCB bulk product waste* in accordance with § 761.62;

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1 Information was submitted by AMC Environmental, LLC on behalf of the Town to support a PCB cleanup and risk-based disposal approach for *PCB remediation waste* under 40 CFR §§ 761.61(a) and (c) and § 761.79(h) and disposal of *PCB bulk product waste* under § 761.62. Attachment 2 is the Administrative Record which provides a list of supporting information for the PCB cleanup and disposal request. The Administrative Record will be referred to as the "Notification".

- Remove and dispose of miscellaneous materials in the gymnasium, including but not limited to gym crash pads, office equipment and furniture, HVAC equipment and sports equipment, as a ≥ 50 ppm *PCB remediation waste* in accordance with 40 CFR § 761.61(a)(5)(i)(B)(*2*)(*iii*);

- Remove gymnasium ceiling, including steel truss and tectum decking, and dispose as a *PCB bulk product waste* in accordance with 40 CFR § 761.62;

- Remove cove base and adhesive (gymnasium and hallway), floor tile and adhesive (gymnasium office) and acoustical panel insulation (gymnasium) and dispose as a *PCB bulk product waste* in accordance with 40 CFR § 761.62;

- Remove PCB-contaminated fire proofing from the steel i-beams to achieve a less than or equal to ("≤") 10 µg/100 cm^2 PCB cleanup standard;

- Decontaminate metal ceiling to achieve a ≤ 10 µg/100 cm^2 PCB cleanup standard;

- Remove gymnasium flooring system and a minimum 1.25 inches of concrete floor and dispose as a *PCB bulk product waste* in accordance with 40 CFR § 761.62;

- Remove interim concrete skim coat and stone flooring in the hallway and dispose as a *PCB bulk product waste* in accordance with 40 CFR § 761.62;

- Conduct verification sampling of *porous surfaces* (e.g., brick, CMU, and concrete floor) to determine if PCB concentrations are ≤ 1 ppm without further restriction or less than ("<") 50 ppm for encapsulation;

- Encapsulate PCB *porous surfaces* in gymnasium (i.e., CMU, concrete columns, and concrete floor) and hallway (e.g., CMU and concrete floor) with PCB concentrations greater than (">") 1 ppm but < 50 ppm with an epoxy-based coating or other equivalent barrier (e.g., new floor); and,

- Record a deed restriction to document that PCBs at > 1 ppm remain at the Site.

B. Classrooms, Hallway Window outside Gym, and 1997 addition

- Remove PCB caulk, associated *non-porous surfaces* (e.g., window/door units, etc), and adjacent *porous surfaces* (i.e., concrete, CMU, brick, and mortar) in classrooms and hallway window and dispose as a *PCB bulk product waste* in accordance with § 761.62;

- Remove window caulk in 1997 addition (Rooms 107, 108, Media Center, and Special Education) and dispose as < 50 ppm *PCB remediation waste* in accordance with § 761.61(a)(5)(i)(B)(*2*)(*ii*);

- Leave in-place less than ("<") 50 ppm PCB-contaminated expansion joint caulk which was previously encapsulated as part of the 2012 interim measures; and,

- Conduct verification sampling of CMU, brick, and mortar to confirm that the PCB cleanup standard of ≤ 1 ppm has been met.

C. Soil and Asphalt

- Remove PCB-contaminated soil and asphalt with > 1 ppm but < 50 ppm;
- Conduct verification sampling in accordance with 40 CFR Part 761, Subpart O to confirm that a PCB cleanup standard of ≤ 1 ppm has been met; and,
- Dispose of all soil and asphalt as a < 50 ppm *PCB remediation waste* at a state-permitted non-hazardous waste landfill in accordance with § 761.61(a)(5)(i)(B)(*2*)(*ii*).

Details on PCB waste to be generated under the Notification and disposal information are included in Attachments 3 and 4.

The Town has determined that certain building materials (e.g., gymnasium roof flashing, window/door caulk in the 1959 addition, and paint) which have PCB concentrations < 50 ppm, are *Excluded PCB Products* as defined under 40 CFR § 761.3. Under the PCB regulations, *Excluded PCB Products* are authorized for use and thus there is no requirement to remove these building materials or to decontaminate surfaces that are in contact with these building materials. As indicated in the Notification, the Town is proposing to manage these products under the Connecticut Department of Energy and Environmental Protection (CTDEEP) requirements.

With the exception of the verification sampling requirements under 40 CFR § 761.61(a)(6) and the encapsulation of PCB-contaminated *porous surfaces*, the proposed plan is consistent with the requirements for removal/disposal of *PCB bulk product waste* under § 761.62 and for cleanup and disposal of *PCB remediation waste* under § 761.61. Based on the data to date, and the proposed abatement plan, the alternative sampling plan is reasonable for the purpose of determining if the PCB cleanup standards have been met and if encapsulation is necessary. The proposed encapsulation of PCB-contaminated *porous surfaces* should effectively prevent direct exposure of the PCB-contaminated *porous surfaces* to building users provided the physical barriers are maintained.

Based on EPA's review of the information provided, the proposed PCB cleanup and disposal work is acceptable and will create no unreasonable risk of injury to human health or the environment when conducted in accordance with the Notification and this Approval and the conditions of Attachment 1. EPA applies this reasonable risk standard in accordance with the PCB regulations at 40 CFR §761.61(c), and the Toxic Substances Control Act, at 15 USC § 2605(e).

The Town may proceed with its project in accordance with 40 CFR §§ 761.61(a) and (c); § 761.79(h); § 761.62; its Notification; and, this Approval, subject to the conditions of Attachment 1. Under this Approval, EPA is reserving its rights to require additional investigation or mitigation measures should EPA determine that the encapsulation is not effective in eliminating exposure to PCBs.

With respect to the < 50 ppm PCB-contaminated expansion joint caulk, the Town is proposing to leave this caulk in-place under long-term monitoring and maintenance. Please be aware that in the event the Town determines this caulk is not a *PCB remediation waste* as defined under 40 CFR § 761.3, CTDEEP may require that the expansion joint caulk be removed and disposed of. If so, notification to EPA may be required (see Attachment 1 Condition 24).

Please be aware that this Approval requires the Town to post this Approval on the school's website within 3 days of receipt (see Attachment 1, Condition 11). EPA also expects the Town to continue its outreach to school users as well as to other interested stakeholders. This Approval requires that the school's monitoring plan include a community outreach component (see Attachment 1, Condition 28).

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

Questions and correspondence regarding this Approval should be directed to:

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

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

Sincerely,

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

Attachment 1: PCB Approval Conditions
Attachment 2: Administrative Record
Attachment 3: Waste Classification Table – Gymnasium/Hallway
Attachment 4: Waste Classification Table - Windows

cc: Jason Pringle, AMC Environmental
Sal Morabito, Town of Fairfield
Gary Trombly, CTDEEP
Brian Toal, CTDPH

ATTACHMENT 1:

PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS
OSBORN ELEMENTARY SCHOOL ("the Site")
760 STILLSON AVENUE
FAIRFIELD, CONNECTICUT

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to *PCB remediation waste and PCB bulk product waste* identified in the Notification[1] and located at the Site.

2. The Town of Fairfield ("the Town") for the Board of Education shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.

3. In the event that the activities described in the Notifications differ from the conditions specified in this Approval, the conditions of this Approval shall govern.

4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.

5. The Town must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, the Town shall contact EPA within twenty-four (24) hours for direction on sampling and cleanup requirements.

6. The Town is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the Town has or receives information indicating that the Town or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within twenty-four (24) hours of having or receiving the information.

7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the Town are authorized to conduct the activities set forth in the Notification. The Town is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

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[1] Information was submitted by AMC Environmental, LLC on behalf of the Town to support a PCB cleanup and risk-based disposal approach for *PCB remediation waste* under 40 CFR §§ 761.61(a) and (c) and § 761.79(h) and for disposal of *PCB bulk product waste* under § 761.62. Attachment 2 is the Administrative Record which provides a list of supporting information for the PCB cleanup and disposal request. The Administrative Record will be referred to as the "Notification".

8. This Approval does not waive or compromise EPA's enforcement and regulatory authority, nor release the Town from any other applicable requirements of federal, state or local law, including those affecting any other contamination.

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

NOTIFICATION AND CERTIFICATION CONDITIONS

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

11. The Town shall post a copy of the Approval on the school's website within three (3) business days of receipt.

12. The Town shall notify EPA in writing of the scheduled date of commencement of on-site activities at least three (3) business days prior to conducting any work under this Approval.

13. Prior to initiating onsite work under this Approval, the Town shall submit the following information for EPA review and/or approval:

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

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

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

    d. In the event that separate contractors and/or laboratories are utilized for different phases of the PCB work, the requirements specified in Condition 13. a through c shall apply to each.

REMEDIAL AND DISPOSAL CONDITIONS

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

15. PCB-contaminated building materials shall be decontaminated and verification sampling and analysis shall be conducted as described below:

    a. All visible residues of *PCB bulk product waste* (e.g., caulk, glazing, paint, spray applied fireproofing and associated *porous* and *non-porous surfaces* including exterior window and door systems) shall be removed and disposed of in accordance with 40 CFR § 761.62.

    b. The decontamination requirements for PCB-contaminated *non-porous surfaces* to remain (i.e., i-beams, metal ceiling) shall be as follows:

        i) All visible residues of spray applied fireproofing shall be removed, as applicable, and disposed of in accordance with 40 CFR § 761.62.

        ii) The PCB decontamination standard for *non-porous surfaces* shall be ≤ 10 µg/100 cm^2.

        iii) Sampling of *non-porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. µg/100 cm^2) and at the frequency specified in the Notification (see Appendix A).

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

        v) For decontaminated *non-porous surfaces* that have PCB concentrations at greater than (>) 10 µg/100 cm^2, the Town may conduct additional decontamination to achieve the required decontamination standard or must store and dispose of these materials as TSCA-regulated waste in accordance with 40 CFR Part 761.

c. The PCB cleanup standards for *porous surfaces* (e.g., concrete, concrete masonry unit ("CMU"), brick, and mortar) located adjacent to *PCB bulk product waste* shall meet the requirements under 40 CFR § 761.61(a)(4) and § 761.61(c) as follows (see Appendices A and B):

i) Classrooms, Hallway window outside gym, and 1997 Section. The PCB cleanup standard for *PCB remediation waste* (e.g., CMU, brick, mortar to remain in-place) shall be less than or equal to ("≤") 1 part per million ("ppm") PCBs.

ii) Gymnasium and Hallway. The PCB cleanup standard for *PCB remediation waste* (e.g., CMU and concrete to remain in-place) shall be less than ("<") 50 ppm (see Condition 15.c.v, below).

iii) Verification sampling of *porous surfaces* shall be performed on a bulk basis (i.e., mg/Kg) and analytical results shall be reported on a dry weight basis. Samples shall be collected according to the EPA Region 1 *Standard Operating Procedure For Sampling Porous Surfaces* dated May 5, 2011 to a maximum depth of 0.5 inches. Samples shall be collected at the frequency described in the Notification.

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

v) In the event the less than or equal to ("≤") 1 ppm PCB cleanup standard for *porous surfaces* cannot be met, the PCB-contaminated *porous surfaces* shall be encapsulated as described in the Notification.

d. Following encapsulation of PCB-contaminated *porous surfaces*, sampling shall be conducted to determine the effectiveness of the encapsulation.

i) Wipe sampling of encapsulated surfaces shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. µg/100 cm^2). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.

ii) Indoor air sampling shall be conducted in accordance with EPA Method TO-4A or TO-10A. Sufficient sample volumes shall be collected to provide a minimum laboratory reporting limit of < 0.05 µg/m^3 for total PCBs. At a minimum, PCB analysis shall include PCB homologues and/or PCB congeners.

iii) In the event that PCB concentrations in the wipe samples are greater than (">)" 1 µg/100 cm^2 or air sample results are > 0.10 µg/m^3, the Town shall contact EPA for further discussion and direction on alternatives, which may include development of a site-specific risk exposure assessment.

iv) The Town shall submit a monitoring and maintenance plan (MMP) to monitor the long-term effectiveness of the encapsulants. (see Condition 28).

16. The PCB cleanup standard for soils and asphalt shall be ≤ 1 ppm.

a. Verification samples shall be collected on a bulk basis (i.e., mg/Kg) and PCB analytical results shall be reported on a dry weight analysis. Verification sampling shall be conducted in accordance with 40 CFR Part 761, Subpart O.

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

17. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with § 761.40; stored in a manner prescribed in § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below:

a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).

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

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

DEED RESTRICTION AND USE CONDITIONS

18. Within thirty (30) days of completing the activities described in the Notification and in the Approval, the Town shall submit for EPA review and approval, a draft deed restriction for the Site. The deed restriction shall include: a description of the PCB remedial actions taken at the Site; a description of the nature and extent of PCB contamination remaining at the Site following abatement; a description of the use

restrictions for the Site; and the long-term monitoring and maintenance requirements on the Site. Within seven (7) days of receipt of EPA's approval of the draft deed restriction, the Town shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

SALE, LEASE, OR TRANSFER CONDITIONS

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

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

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

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

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

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

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

22. Approval for these activities may be revoked, modified or otherwise altered: if EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; if EPA finds that these activities present an unreasonable risk to public health or the environment; if EPA finds that there is migration of PCBs from the Site; or if EPA finds that changes are necessary to comply with new rules, standards, or guidance for such approvals. The Town may apply for appropriate modifications in the event new rules, standards, or guidance comes into effect.

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

24. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii). If such modification involves a change in the use of the Site which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from the Town to make a determination regarding potential risk.

25. The Town shall record any amendment to the deed restriction, resulting from any approved change or modification(s), within sixty (60) days of such change(s). (See Condition 18).

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

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

28. Within 60 days of completion of the work authorized under this Approval, the Town shall submit for EPA's review and approval, a detailed monitoring and maintenance plan (MMP) for the surface encapsulants and for indoor air, as applicable. The Town shall incorporate any changes to the MMP required by EPA.

    a. The MMP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols and frequency, and analytical criteria; and reporting requirements.

    b. The MMP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including building users, other on-site workers, and interested stakeholders.

    c. The MMP shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the building coatings/barriers.

    d. The Town shall submit the results of these long-term monitoring and maintenance activities to EPA. Based on its review of the results, EPA may determine that modification to the MMP is necessary in order to monitor and/or evaluate the long-term effectiveness of the coatings and/or barriers.

    e. Activities required under the MMP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.

RECORDKEEPING AND REPORTING CONDITIONS

29. The Town shall prepare and maintain all records and documents required by 40 CFR Part 761, including, but not limited to, the records required by Subparts J and K. The Town shall maintain a written record of the cleanup and the analytical sampling for activities conducted under this Approval at the Site. All records shall be made available for inspection by authorized representatives of the EPA, until such time as EPA approves in writing a request for an alternative disposition of such records.

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

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

32. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, Massachusetts 02109-3912

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

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END OF ATTACHMENT 1

Materials to be Abated and Verification Sample Estimates
Osborn Hill Elementary School - Gymnasium and Hallway
Fairfield, CT

Removal Location	Building Material to be Removed	Adjacent Porous Building Material Substrate to be Removed	Verification Samples (1)
Gymnasium (Main)	Approximately 320 linear feet of Expansion Joint Caulk containing ≥50 PPM PCBs	Approximately 320 linear feet (12") of porous CMU Block Wall/Concrete Column Casing in contact with expansion joint caulk	6 chip samples from the porous concrete block
	Approximately 100 linear feet of Door Frame Caulk containing ≥50 PPM PCBs	Approximately 100 linear feet (12") of CMU Block Wall in contact with door frame caulk	3 chip samples from the porous block 2 wipe samples from poly sheeting/equipment
	Approximately 4000 square feet of Wall Paint containing ≥50 PPM PCBs	n/a	35 chip samples from the porous concrete block 20 wipe samples on encapsulated vertical walls
	Approximately 2500 square feet of Spray Applied Fireproofing containing ≥50 PPM PCBs Approximately 2500 square feet of Tectum Decking containing ≥50 PPM PCBs	n/a	10 wipe samples from steel I-beams that will remain in place
	Approximately 2500 square feet of Rubber Flooring/Adhesive containing ≥50 PPM PCBs Approximately 2500 square feet of Hardwood Flooring, Sealant & associated Foam containing ≥50 PPM PCBs Approximately 220 linear feet of Cove Base/Adhesive containing ≥50 PPM PCBs	Approximately 2500 square feet of 1 1/4 inches of porous Concrete Slab in contact with rubber flooring/adhesive, hardwood flooring, sealant & associated foam	25 chip samples from the porous concrete slab 12 wipe samples from the encapsulated concrete slab 6 chip samples from the porous CMU wall
	Approximately 200 square feet of Accousitcal Panel Insulation containing ≥50 PPM PCBs	n/a (wall paint already being removed)	(chip sampling included in paint removal)

(1) Chip (bulk) samples shall be collected in accordance with the EPA Region 1 SOP for Sampling Porous Surfaces dated May 5, 2011. Wipe samples shall be collected in accordance with 40 CFR § 761.123

Materials to be Abated and Verification Sample Estimates
Osborn Hill Elementary School - Gymnasium and Hallway
Fairfield, CT

Removal Location	Building Material to be Removed	Adjacent Porous Building Material Substrate to be Removed	Verification Samples (1)
Gymnasium (Office)	Approximately 570 square feet of Wall Paint containing ≥50 PPM PCBs	n/a	4 chip samples from the porous CMU Block 4 wipe samples on encapsulated vertical walls
	Approximately 220 square feet of Floor Tile and adhesive containing ≥50 PPM PCBs	n/a	3 chip samples from the porous concrete slab 3 wipe samples on encapsulated floor (if needed)
	Cleaning of approximately 220 square feet of corregated metal ceiling	n/a	6 wipe samples from metal ceiling
Gymnasium (storage)	Approximately 265 square feet of 1/2" Concrete Slab containing ≥50 PPM PCBs	n/a	3 chip samples from the porous concrete slab 4 wipe samples from poly sheeting and equipment
	Cleaning of approximately 265 square feet of corregated metal ceiling	n/a	7 wipe samples from the metal ceiling
Hallway - Main/Gym	Approximately 1680 square feet of Floor Tile, Stone Flooring and Concrete Skim Coat containing ≥50 PPM PCBs Approximately 280 linear feet of Cove Base and Adhesive containing ≥50 PPM PCBs	n/a	25 chip samples from the concrete slab 8 chip samples from the porous CMU Block 2 wipe samples from poly sheeting and equipment
Hallway - O/S Rooms 112 to Room 116	Approximately 3100 square feet of Wall Paint containing ≥50 PPM PCBs	n/a	40 chip samples from the porous block 2 wipe samples on poly sheeting/equipment
Hallway - O/S Room 119	Approximately 200 square feet of Floor Tile, Stone Flooring and Concrete Skim Coat containing ≥50 PPM PCBs Approximately 40 linear feet of Cove Base and Adhesive containing ≥50 PPM PCBs	n/a	4 chip samples from the concrete slab 2 chip samples from the porous CMU Block 2 wipe samples from poly sheeting/equipment

(1) Chip (bulk) samples shall be collected in accordance with the EPA Region 1 SOP for Sampling Porous Surfaces dated May 5, 2011. Wipe samples shall be collected in accordance with 40 CFR § 761.123

Materials to be Abated and Verification Sample Estimates
Osborn Hill Elementary School - Window Project
Fairfield, CT

Removal Location	Caulking Compounds to be Removed	Glazing Compounds to be Removed	Adjacent Porous Building Material Substrate to be Removed	Verification Samples (1)
1969 Section - Type 5 Room 116 Room 117 Room 118	Approximately 130 linear feet of exterior window caulking, approximately 130 linear feet of interior window frame caulking and approximately 63 linear feet of interior door frame caulk compounds containing ≥50 PPM PCBs	Approximately 384 linear feet of interior glazing compounds containing ≥50 PPM PCBs around perimeter of windows in contact with window frame and glass	Approximately 55 square feet (6") of porous exterior brick and mortar in contact with window caulk. Approximately 87 square feet (8") of porous interior CMU block/mortar in contact with window caulk. Approximately 63 square feet (8") of interior CMU block and mortar in contact with door frame caulk.	3 chip samples from the porous concrete block/mortar 3 chip samples from the porous brick/mortar 2 wipe samples on poly sheeting within each containment for a total of 6 wipe samples assuming 3 containments for removal in this location
1969 Section - Type 5 Room 119 Room 120 Room 121	Approximately 130 linear feet of exterior window caulking, approximately 130 linear feet of interior window frame caulking and approximately 63 linear feet of interior door frame caulk compounds containing ≥50 PPM PCBs	Approximately 384 linear feet of interior glazing compounds containing ≥50 PPM PCBs around perimeter of windows in contact with window frame and glass	Approximately 115 square feet (12") of porous exterior brick and mortar in contact with window caulk. Approximately 175 square feet (16") of porous interior CMU block/mortar in conact with window caulk. Approximately 80 square feet (16") of interior block and mortar in contact with door frame caulk.	6 chip samples from the porous concrete block/mortar 3 chip samples from the porous brick 3 chip samples from the porous brick mortar 2 wipe samples on poly sheetring within each containment for a total of 6 wipe samples assuming 3 containments for removal in this location

(1) Chip (bulk) samples shall be collected in accordance with the EPA Region 1 SOP for Porous Surfaces dated May 5, 2011. Wipe samples shall be collected in accordance with 40 CFR § 761.123.

Materials to be Abated and Verification Sample Estimates
Osborn Hill Elementary School - Window Project
Fairfield, CT

Removal Location	Caulking Compounds to be Removed	Glazing Compounds to be Removed	Adjacent Porous Building Material Substrate to be Removed	Verification Samples (1)
1969 Section - Type 5 Room 122 Room 123 Room 124	Approximately 130 linear feet of exterior window caulking, approximately 130 linear feet of interior window frame caulk and approximately 63 linear feet of interior door frame caulk compounds containing ≥50 PPM PCBs	Approximately 384 linear feet of interior glazing compounds containing ≥50 PPM PCBs around perimeter of windows in contact with window frame and glass	Approximately 55 square feet (6") of porous exterior brick and mortar in contact with window caulk. Approximately 87 square feet (8") of porous interior CMU block/mortar in contact with window caulk. Approximately 63 square feet (8") of interior CMU block and mortar in contact with door frame caulk.	3 chip samples from the porous concrete block/mortar 3 chip samples from the porous brick/mortar 2 wipe samples on poly sheeting within each containment for a total of 6 wipe samples assuming 3 containments for removal in this location
1958 Section - Type M Corridor o/s Gym	Approximately 54 linear feet of exterior window caulking compounds containing ≥50 PPM PCBs	Approximately 65 linear feet of interior glazing and 65 linear feet of exterior glazing compounds containing ≥50 PPM PCBs	Approximately 27 square feet (6") of adjacent porous concrete column in contact with exterior window caulking	2 chip samples from the concrete column 2 wipe samples on poly sheeting within each containment for a total of 4 wipe samples assuming 2 containments for removal in this location
1958 Section - Type 1 Room 101 Room 102 Room 103 Room 104 Room 105	Approximately 160 linear feet of exterior door caulking and 320 linear feet of exterior window caulking compounds containing < 50 PPM PCBs	N/A	N/A	7 chip samples from the porous block/mortar 2 wipe samples on poly sheeting within each containment for a total of 10 wipe samples assuming 5 containments for removal in this location

(1) Chip (bulk) samples shall be collected in accordance with the EPA Region 1 SOP for Porous Surfaces dated May 5, 2011. Wipe samples shall be collected in accordance with 40 CFR § 761.123.

Materials to be Abated and Verification Sample Estimates
Osborn Hill Elementary School - Window Project
Fairfield, CT

Removal Location	Caulking Compounds to be Removed	Glazing Compounds to be Removed	Adjacent Porous Building Material Substrate to be Removed	Verification Samples (1)
1958 Section - Type 1 Room 106	Approximately 21 linear feet of exterior door caulking and 86 linear feet of exterior window caulking compounds containing < 50 PPM PCBs	N/A	N/A	2 chip samples from the porous block/mortar 2 wipe samples on poly sheeting within each containment for a total of 2 wipe samples assuming 1 containment for removal in this location
1958 Section - Type 1 Room 109	Approximately 21 linear feet of exterior door caulking and 64 linear feet of exterior window caulking compounds containing < 50 PPM PCBs	N/A	N/A	2 chip samples from the porous block/mortar 2 wipe samples on poly sheeting within each containment for a total of 2 wipe samples assuming 1 containment for removal in this location
1997 Section - Type 3 Room 107 Room 108	Approximately 96 linear feet of interior window caulking and 96 linear feet of exterior window caulking compounds containing < 50 PPM PCBs	N/A	N/A	2 chip samples from the porous block/mortar 2 wipe samples on poly sheetingwithin each containment for a total of 4 wipe samples assuming 2 containments for removal in this location

(1) Chip (bulk) samples shall be collected in accordance with the EPA Region 1 SOP for Porous Surfaces dated May 5, 2011. Wipe samples shall be collected in accordance with 40 CFR § 761.123.

Materials to be Abated and Verification Sample Estimates
Osborn Hill Elementary School - Window Project
Fairfield, CT

Removal Location	Caulking Compounds to be Removed	Glazing Compounds to be Removed	Adjacent Porous Building Material Substrate to be Removed	Verification Samples (1)
1958 Section - Type 2 Room 105 (façade D)	Approximately 21 linear feet of exterior door caulking and 45 linear feet of exterior window caulking compounds containing < 50 PPM PCBs	N/A	N/A	2 chip samples from the porous block/mortar 2 wipe samples on poly sheeting within each containment for a total of 2 wipe samples assuming 1 containment for removal in this location
1958 Section - Type 2 Room 106 (façade D)	Approximately 21 linear feet of exterior door caulking and 66 linear feet of exterior window caulking compounds containing < 50 PPM PCBs	N/A	N/A	2 chip samples from the porous block/mortar 2 wipe samples on poly sheeting within each containment for a total of 2 wipe samples assuming 1 containment for removal in this location
1958 Section - Type 1 Room 109 Room 110	Approximately 21 linear feet of exterior door caulking and 66 linear feet of exterior window caulking compounds containing < 50 PPM PCBs	N/A	N/A	2 chip samples from the porous block/mortar 2 wipe samples on poly sheeting within each containment for a total of 4 wipe samples assuming 2 containment for removal in this location

(1) Chip (bulk) samples shall be collected in accordance with the EPA Region 1 SOP for Porous Surfaces dated May 5, 2011. Wipe samples shall be collected in accordance with 40 CFR § 761.123.

Materials to be Abated and Verification Sample Estimates
Osborn Hill Elementary School - Window Project
Fairfield, CT

Removal Location	Caulking Compounds to be Removed	Glazing Compounds to be Removed	Adjacent Porous Building Material Substrate to be Removed	Verification Samples (1)
1958 Section - Type 1 Room 112 Room 113 Room 114 Room 115	Approximately 84 linear feet of exterior door caulking and 265 linear feet of exterior window caulking compounds containing < 50 PPM PCBs	N/A	N/A	2 chip samples from the porous block/mortar 2 wipe samples on poly sheeting within each containment for a total of 8 wipe samples assuming 4 containments for removal in this location
1958 Section - Type 1 Room 125 Boys/Girls Toilet Room	Approximately 31 linear feet of exterior window caulking compounds containing < 50 PPM PCBs	N/A	N/A	1 chip samples from the porous block/mortar 2 wipe samples on poly sheeting within each containment for a total of 4 wipe samples assuming 2 containment for removal in this location
1958 Section - Type 1A Cafeteria	Aproximately 55 linear feet of exterior window caulk containing <50 PPM PCBs	N/A	N/A	2 chip samples from the porous block/mortar 2 wipe samples on poly sheeting within each containment for a total of 2 wipe samples assuming 1 containments for removal in this location

(1) Chip (bulk) samples shall be collected in accordance with the EPA Region 1 SOP for Porous Surfaces dated May 5, 2011. Wipe samples shall be collected in accordance with 40 CFR § 761.123.

Materials to be Abated and Verification Sample Estimates
Osborn Hill Elementary School - Window Project
Fairfield, CT

Removal Location	Caulking Compounds to be Removed	Glazing Compounds to be Removed	Adjacent Porous Building Material Substrate to be Removed	Verification Samples (1)
1958 Section - Type 1A Principal's Office Nurse's Office Main Office	Aproximately 132 linear feet of exterior window caulk containing <50 PPM PCBs	N/A	N/A	3 chip samples from the porous block/mortar 2 wipe samples on poly sheeting within each containment for a total of 6 wipe samples assuming 3 containments for removal in this location

(1) Chip (bulk) samples shall be collected in accordance with the EPA Region 1 SOP for Porous Surfaces dated May 5, 2011. Wipe samples shall be collected in accordance with 40 CFR § 761.123.

Materials to be Abated and Verification Sample Estimates
Osborn Hill Elementary School - Window Project
Fairfield, CT

Removal Location	Caulking Compounds to be Removed	Glazing Compounds to be Removed	Adjacent Porous Building Material Substrate to be Removed	Verification Samples (1)
1997 Section - Library and Special Ed Room	Approximately 220 linear feet of exterior window caulking and 220 linear feet of interior window caulking compounds containing < 50 PPM PCBs Remediation Waste	N/A	N/A	12 chip samples from the porous block/mortar 12 chip samples from the porous brick/mortar 2 wipe samples on poly sheetingwithin each containment for a total of 6 wipe samples assuming 3 containments for removal in this location
SOIL. 1969 Section Type 5 windows outside Rooms 122, 123, and 124	Remove approximately 5 cubic yards of soil containing PCBs greater than 1 ppm			Subpart O. 20-30 soil grab samples within remediation area
ASPHALT. 1969 Section Type 5 windows outside Rooms 116, 117, 118, 119, 120, 121, and 122	Remove approximately 4 cubic yards of asphalt containing PCBs greater than 1 ppm			Subpart O. 15-25 soil grab samples (below asphalt) within remediation area

(1) Chip (bulk) samples shall be collected in accordance with the EPA Region 1 SOP for Porous Surfaces dated May 5, 2011. Wipe samples shall be collected in accordance with 40 CFR § 761.123.

ATTACHMENT 2

ADMINISTRATIVE RECORD
OSBORN HILL ELEMENTARY SCHOOL
FAIRFIELD, CONNECTICUT

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Performance-Based Disposal Plan/Risk Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways, March 31, 2014. (FINAL) Email April 2, 2014*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Self-Implementing On Site Cleanup and Disposal Plan, March 31, 2014, Rev. 2. (FINAL) Email April 2, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Self-Implementing On Site Cleanup and Disposal Plan, March 31, 2014. Email April 1, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Performance-Based Disposal Plan/Risk Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways, March 31, 2014. Email March 31, 2014*

- *Kimberly Tisa (EPA) to Sandy Owen (AMC Environmental, LLC), Comments on Self-Implementing On Site Cleanup and Disposal Plan, March 27, 2014. Email March 30, 2014.*

- *Kimberly Tisa (EPA) to Sandy Owen (AMC Environmental, LLC), EPA Comments on Performance-Based Disposal Plan/Risk Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways, March 27, 2014. Email March 30, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Self-Implementing On Site Cleanup and Disposal Plan, March 27, 2014. Email March 27, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Performance-Based Disposal Plan/Risk Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways, March 27, 2014. Email March 27, 2014*

- *Sandy Owen (AMC Environmental LLC) to Kimberly Tisa (EPA), AMC Response to March 23, 2014 EPA Comments on Self-Implementing Cleanup and Disposal Plan, March 18, 2014. Email March 27, 2014*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA, Response to March 24, 2014 EPA Comments on Performance-Based Disposal Plan/Risk Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways, March 18, 2014. Email March 27, 2014.*

- *Kimberly Tisa (EPA) to Sandy Owen (AMC Environmental, LLC), EPA Comments on Performance-Based Disposal Plan/Risk Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways, March 18, 2014. Email March 24, 2014.*

- *Kimberly Tisa (EPA) to Sandy Owen (AMC Environmental, LLC), Comments on Self-Implementing On Site Cleanup and Disposal Plan, March 18, 2014. Email March 23, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Confirmation on Table 5 revision. Email March 20, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Transmittal of Tables 4 and 5 Waste Classification tables. Email March 20, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Transmittal of March 3, 2014 Memo from Salvatore Morabito to Dr. David Title and Members of the Board of Education with March 20, 2014 Osborn Hill Building Committee draft meeting minutes regarding Osborn Hill School Remediation Plan. Email March 20, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Self-Implementing On Site Cleanup and Disposal Plan, March 18, 2014. Email March 19, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Performance-Based Disposal Plan/Risk Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways, March 18, 2014. Email March 18, 2014*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA, Response to March 1, 2014 EPA Comments on Performance-Based Disposal Plan/Risk Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways, February 17, 2014. Email March 18, 2014.*

- *Kimberly Tisa (EPA) to Sandy Owen (AMC Environmental LLC), Comments on Waste Quantification and Waste Classification. Emails March 17, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Waste Quantification and Waste Classification Tables. Email March 14, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Clarification on cost estimates for gym and operations/maintenance. Email March 14, 2014.*

- *Sandy Owen (AMC Environmental, LLC) to Kimberly Tisa (EPA), Clarification that March 3, 2014 Self-Implementing On Site Cleanup and Disposal Plan should be considered draft copy. Email March 6, 2014.*

- *Kimberly Tisa (EPA) to Sandy Owen (AMC Environmental LLC), Clarification on 40 CFR Part 761 disposal options for Osborn waste. Email March 4, 2014.*

- *Sandy Owen (AMC Environmental LLC) to Kimberly Tisa (EPA), AMC Response to February 27, 2014 EPA Comments on Self-Implementing Cleanup and Disposal Plan, February 17, 2014. Email March 4, 2014*

- *Sandy Owen (AMC Environmental LLC) to Kimberly Tisa (EPA), Self-Implementing On Site Cleanup and Disposal Plan, March 3, 2014. Email March 4, 2014.*

- *Kimberly Tisa (EPA) to Sandy Owen (AMC Environmental, LLC), Comments on Performance-Based Disposal Plan/Risk Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways, February 17, 2014. Email March 1, 2014.*

- *Kimberly Tisa (EPA) to Sandy Owen (AMC Environmental, LLC), Comments on Self-Implementing Cleanup and Disposal Plan, February 17, 2014. Email February 27, 2014.*

- *Sal Morabito (Fairfield Board of Education) to Kimberly Tisa (EPA), Clarification on Town contact for school PCB project. Email February 24, 2014.*

- *Kimberly Tisa (EPA) to Sal Morabito (Fairfield Board of Education), Clarification on Town contact for school PCB project. Email February 22, 2014.*

- *Jason Pringle (AMC Environmental, LLC) to Kimberly Tisa (EPA), Self-Implementing On Site Cleanup and Disposal Plan, February 17, 2014.*

- *Jason Pringle (AMC Environmental, LLC) to Kimberly Tisa (EPA), Performance-Based Disposal Plan/Risk Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways. February 17, 2014.*

- *Jason Pringle (AMC Environmental, LLC) to Kimberly Tisa (EPA) Response to EPA February 4, 2014 Comments on AMC Environmental January 24, 2014 Response to November 13, 2013 EPA Comments on September 23, 2013 and October 1, 2013 PCB cleanup notifications for Osborn Hill Elementary School and December 20, 2013 PCB cleanup notifications. Email February 17, 2014*

- *Sandy Owen (AMC Environmental LLC) to Kimberly Tisa (EPA), Project Cost Revisions letter, February 10, 2014. Email February 11, 2014.*

- *Kimberly Tisa (EPA) to Sal Morabito (Fairfield Board of Education), EPA Comments on January 24, 2014 Response to November 13, 2013 EPA Comments on September 23, 2013 and October 1, 2013 PCB cleanup notifications for Osborn Hill Elementary School and December 20, 2013 PCB cleanup notifications. Email February 4, 2014.*

- *Kimberly Tisa (EPA) to Sal Morabito (Fairfield Board of Education), EPA Comments on January 24, 2014 Response to November 13, 2013 EPA Comments on September 23, 2013 and October 1, 2013 PCB cleanup notifications for Osborn Hill Elementary School and December 20, 2013 Window SIP. Email January 30, 2014.*

- *Jason Pringle (AMC Environmental, LLC) to Kimberly Tisa (EPA), Response to November 13, 2013 EPA Comments on September 23, 2013 and October 1, 2013 PCB cleanup notifications for Osborn Hill Elementary School. January 24, 2014.*

- *Jason Pringle (AMC Environmental, LLC) to Kimberly Tisa (EPA), Self-Implementing On Site Cleanup and Disposal Plan, December 20, 2013.*

- *Jason Pringle (AMC Environmental, LLC) to Kimberly Tisa (EPA), Performance-Based Disposal Plan for PCB-Containing Building Materials Gymnasium and Hallways. December 20, 2013.*

- *Kimberly Tisa (EPA) to Tom Cullen (Fairfield Board of Education), Comments on September 23, 2013 and October 1, 2013 PCB cleanup notifications for Osborn Hill Elementary School. November 13, 2013.*

- *Jason Pringle (AMC Environmental, LLC) to Kimberly Tisa (EPA), Performance-Based Disposal Plan for PCB-Containing Building Materials Gymnasium, October 1, 2013.*

- *Jason Pringle (AMC Environmental, LLC) to Kimberly Tisa (EPA), Self-Implementing On Site Cleanup and Disposal Plan, September 23, 2013.*

Waste Classification and Disposal Table - Gymnasium/Hallway

Osborn Hill Elementary School, Fairfield, CT

Material	Locations	Waste Classification	Regulatory Citation	Waste Disposal Facility
Spray applied fireproofing	Gymnasium	PCB Bulk Product Waste	40 CFR 761.62(a) or (b)*	TBD
Crash Pads & associated foam	Gymnasium	PCB Remediation Waste ≥50 ppm PCBs	40 CFR 761.61(a)(5)(i)(B)(2)(iii)	EQ Michigan or equivalent
Movable Objects (desks, gym supplies, crash pads, acoustical panel insulation, etc.)	Gymnasium & Gym Office	PCB Remediation Waste ≥50 ppm PCBs	40 CFR 761.61(a)(5)(i)(B)(2)(iii)	EQ Michigan or equivalent
HVAC equipment and fixed object (i.e. basketball hoop)	Gymnasium	PCB Remediation Waste ≥50 ppm PCBs	40 CFR 761.61(a)(5)(i)(B)(2)(iii)	EQ Michigan or equivalent
Hardwood flooring, sealant & associated foam below floor	Gymnasium	PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Rubber gym flooring and associated mastic	Gymnasium	Mixed asbestos containing PCB Bulk Product Waste	40 CFR 761.62(a) or (b) CGS 22a-463-469	TBD
Floor tile and adhesive	Gymnasium Office	PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Cove base and adhesive	Gymnasium, outside room 119, main hallway	PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Expansion Caulk	Gymnasium	Mixed asbestos containing PCB Bulk Product Waste	40 CFR 761.62(a) or (b) CGS 22a-463-469	TBD
Metal Truss	Gymnasium	PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Tectum decking	Gymnasium	PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Wall paint	Gymnasium & Hallways	PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Block wall	Gymnasium	PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Door caulk	Gymnasium	Mixed asbestos containing PCB Bulk Product Waste	40 CFR 761.62(a) or (b) CGS 22a-463-469	TBD
Concrete slab	Gymnasium	PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Floor tile, stone flooring, concrete skim coat	Outside Room 119 and main hallway	PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Roof flashing/tar	Gymnasium	RCRA Title D/CT Regulated Waste	CGS 22a-463-469	Model City, NY or equivalent
Rolled roofing	Gymnasium	Construction Debris	n/a	
Built-up roofing	Gymnasium	Construction Debris	n/a	

Waste Classification and Disposal Table - Gymnasium/Hallway

Osborn Hill Elementary School, Fairfield, CT

Material	Locations	Waste Classification	Regulatory Citation	Waste Disposal Facility
Roof Insulation	Gymnasium	Construction Debris	n/a	
Solid Decontamination Waste	Gymnasium/Hallway	PCB Remediation Waste	40 CFR 761.61(a)(5)(i)(B)(2)(ii	EQ Michigan or equivalent
Liquid Decontamination Waste	Gymnasium/Hallway	PCB Liquid Waste	40 CFR 761.60(a) or 40 CFR 761.79(b)	TBD

Waste Classification and Disposal Table - Windows
Osborn Hill Elementary School, Fairfield CT

Material	Locations	Waste Classification	Regulatory Citation	Waste Disposal Facility
Exterior window caulking, interior window caulking, interior glazing compound, interior door frame caulk, associated non-porous window/door frame,window glass, interior adjacent CMU block/mortar, exterior adjacent porous brick/mortar	Rooms: 116, 117, 118, 119, 120, 121, 122, 123, 124	Mixed waste asbestos containing PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Exterior window caulking, interior glazing compound, associated non-porous window frame, window glass and cut back porous concrete	Hallway outside Gymnasium	Mixed waste asbestos containing PCB Bulk Product Waste	40 CFR 761.62(a) or (b)	TBD
Exterior door caulking, exterior window caulking, interior window glazing compounds, associated non-porous door frame and window frames	Rooms: 112, 113, 114, 115, 125, 110, 106, 105, 104, 103, 102, 101	Mixed waste asbestos containing <50 ppm PCB CT Regulated Waste	40 CFR 761.61(a)(5)(i)(B)(2)(ii) CGS 22a-463-469	Rochester, NH or equivalent
Exterior door caulking, exterior window caulking, associated non-porous door frame and window frame	Cafeteria, Main Office, Nurse's Office, Princpals Office	RCRA Title D/CT Regulated Waste	CGS 22a-463-469	Rochester, NH or equivalent
Interior window caulking, exterior window caulking	Rooms 107, 108, Media Center, Special Education	PCB Remediation Waste <50 ppm PCB	40 CFR 761.61(a)(5)(i)(B)(2)(ii)	Rochester, NH or equivalent
Asphalt	Outside Rooms 116, 117, 118, 119, 120, 121, 122	PCB Remediation Waste <50 ppm PCB	40 CFR 761.61(a)(5)(i)(B)(2)(ii)	Rochester, NH or equivalent
Soil	Outside Room 122, 123, 124	PCB Remediation Waste <50 ppm PCB	40 CFR 761.61(a)(5)(i)(B)(2)(ii)	Rochester, NH or equivalent

Waste Classification Table - Windows

Osborn Hill Elementary School, Fairfield CT

Material	Locations	Waste Classification	Regulatory Citation	Waste Disposal Facility
Solid Decontamination Waste	Windows	PCB Remediation Waste <50 ppm PCB	40 CFR 761.61(a)(5)(i)(B)(2)(ii)	Rochester, NH or equivalent
Liquid Decontamination Waste	Windows	PCB Liquid Waste	40 CFR 761.60 (a) or 40 CFR 761.79(b)	TBD