

CITY COUNCIL / LRA BOARD

Mayor/Chair

Rachel Hernandez

Council/Authority Members

District 1 — Luis Uribe

District 2 — Cindy Fosi

Vice Mayor, District 3 — John Pimentel

District 4 — Stacy Call



CITY OF RIVERBANK

SPECIAL

City Council and Local Redevelopment Authority Board Meeting

Council Chambers

6707 Third Street, Suite B

Riverbank, CA 95367



SPECIAL MEETING AGENDA

TUESDAY, MARCH 24, 2026 — 6:00 PM

(THE AGENDA PACKET IS ONLINE AT [HTTPS://RIVERBANKCA.PORTAL.CIVICCLERK.COM/](https://riverbankca.portal.civicclerk.com/))

1. **CALL TO ORDER**

2. **FLAG SALUTE**

3. **ROLL CALL**

4. **AGENDA CHANGES**

5. **CONFLICT OF INTEREST**

Any Council/Authority Member who has a direct Conflict of Interest on any scheduled agenda item to be considered is to declare their conflict at this time. Pursuant to Government Code Section 84308 (Levine Act), any Council /Authority Member who has received a contribution of \$500 or more within the preceding 12 months from a party, participant, or their agent related to an item on the agenda must disclose that contribution on the record prior to participation in the discussion or decision on the item and may be required to recuse themselves, as applicable.

6. **NEW BUSINESS**

Item 6.1. Resolution Authorizing the City Manager to Execute Supplemental Lease Amendment No. 6 to Army Lease DACA0505-1-21-508 Thereby Extending the Interim Lease Through March 31, 2066

7. **ADJOURNMENT**

AFFIDAVIT OF POSTING

I hereby certify under penalty of perjury, under the laws of the State of California that the foregoing agenda was posted at the meeting location, on the North City Hall public exterior bulletin board, South City Hall public exterior Bulletin, Riverbank Community Center exterior bulletin, and the City's website 72 hours prior to the meeting in accordance to the California Ralph M. Brown Act.

Posted this 23rd Day of March 2026. /s/*Gabriela Hernandez, C.M.C., City Clerk*



ADA COMPLIANCE STATEMENT

In compliance with the Americans with Disabilities Act, and the Governor’s Executive Order N-29-20, the City will make every effort to make reasonable modifications or accommodations from individuals with disabilities. Contact the Administration Dept. at (209) 863-7122 or the City Clerk at cityclerk@riverbank.org at least (48) hours prior to the meeting to enable the City to make reasonable arrangements for accessibility.

NOTICE REGARDING NON-ENGLISH SPEAKERS

Pursuant to California Constitution Article III, Section IV, establishing English as the official language for the State of California, and in accordance with California Code of Civil Procedures Section 185, which requires proceedings before any State Court to be in English, notice is hereby given that all proceedings before the City of Riverbank City Council/LRA Board shall be in English and anyone wishing to address the Council is required to have a translator present who will take an oath to make an accurate translation from any language not English into the English language.



How to Use Live Spanish Translation/ Como Usar Traducción en Español En Vivo

STEP 1/PASO 1



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STEP 2/PASO 2



Choose Spanish Language

Escoja el idioma Español

STEP 3/PASO 3



Read Captions on Device
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<https://attend.wordly.ai/join/LHDA-5715>

TELECONFERENCE/VIRTUAL PLATFORM PUBLIC PARTICIPATION COMMENT PROCEDURES FOR CITY COUNCIL MEETING HELD IN CONFORMANCE WITH THE BROWN ACT

PUBLIC "LIVE" VIEWING

- Government Channels: Charter — 2 and AT&T U-VERSE — 99
- YouTube Live — City of Riverbank
- Via ZOOM Platform (See instructions below)

SUBMITTING PUBLIC COMMENTS FOR THE RECORD

Written comments must be received before 4:00 p.m. on the date of the meeting in order for them to be distributed to the Council prior to consideration of the matter.

Written comments will not be read aloud at the meeting, but will be reported as received for the record. If you do not receive an acknowledgement of receipt within an hour of submission or by 5:00 p.m., please call the City Clerk's Office at (209) 863-7198 or the Administration Dept. at (209) 863-7122.

ACCEPTABLE METHODS OF SUBMITTING COMMENTS BEFORE THE 5:00 PM DEADLINE

- **Via Mail Service:** Mail comments to City of Riverbank, Attn: City Clerk, 6707 Third Street, Suite A, Riverbank, CA 95367. (Call 209-863-7198 / 209-863-7122 to ensure they were received.)
- **Via Email:** cityclerk@riverbank.org
(*Note: This technology is not a guaranteed method.*)
 - Indicate Agenda Item # in the *subject line*. (Call 209-863-7198 / 209-863-7122 to ensure receipt.)
- **Oral Comments In-Person:** The Mayor will ask the public if anyone wishes to comment, at that time you may approach the podium.
- **Oral Comments Via Zoom:** The Mayor will announce when public comments may be made for a limit of 3 minutes on the agenda item being considered, at which time you will:
 - **Using a computer** — click on the “raise hand” feature in the webinar controls. This will alert staff that you wish to speak, and you will be unmuted.
 - **Using a Phone** — press *9 to “raise the hand”. This will alert staff that you wish to speak, and you will be unmuted.
 - (Please make sure the volume on your device is on and that any nearby device or any nearby device is turned down.)

Teleconference Phone Number: (This system is a backup for ZOOM technical difficulties only when providing oral comments.) If there are technical difficulties or disconnection with ZOOM

while making oral comments, please immediately call the teleconference phone number (209) 863-7151 so that Council may receive your comments. Council will be waiting for your call. Thank you.

JOIN THE MEETING VIA ZOOM PLATFORM

Join by this link: <https://us02web.zoom.us/j/89443415826>

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RIVERBANK CITY COUNCIL / LRA BOARD

AGENDA ITEM NO. 6.1.

SECTION : NEW BUSINESS

Meeting Date:	3/24/2026
Subject:	Resolution Authorizing the City Manager to Execute Supplemental Lease Amendment No. 6 to Army Lease DACA0505-1-21-508 Thereby Extending the Interim Lease Through March 31, 2066
From:	Marisela H. Garcia, City Manager
Submitted by:	Melissa Holdaway, Administrative Analyst II Cody Bridgewater, Director of Public Works

RECOMMENDATION

It is recommended that the Local Redevelopment Authority ("LRA") Board of Directors ("Board") adopt a Resolution authorizing the City Manager to execute Supplemental Agreement No. 6 to the Army Lease DACA05-1-21-508 ("Interim Lease") and thereby extend the Interim Lease agreement through March 31, 2066.

SUMMARY

An Interim Lease was entered into on April 1, 2021, between the US Army and the City of Riverbank LRA for the former Riverbank Army Ammunition Plant, more recently known as the Riverbank Industrial Complex. The Interim Lease was amended in succession, exercising the right to extend the current term with Supplemental Agreements 1 through 5 for additional years, through March 31, 2026.

The LRA has previously requested a Long Term Interim Lease to ensure the financial sustainability of the site and allow for the Master Developer, Aemetis, to have a financeable location for their future development. The LRA requested via a letter to the Army on August 27, 2025 to include Army Parcel No. 4 (Stormwater Ponds) in the leased premises, extend the lease term so that the Lessee has a sufficient interest in the property to allow for the financing of infrastructure improvements on Federal land, and include standard financing terms similar to those provided in Army privatized housing leases; the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships provided a determination of availability, dated February 19, 2026 for the current form Supplemental Agreement No. 6.

With approval, the attached resolution will authorize the City Manager to provide notice of intent to exercise an option to extend the term and also, upon receipt, execute the Supplemental Agreement No. 6 to extend the term another forty (40) years through March 31, 2066.

STRATEGIC PLAN

This action reinforces the City's core value of fiscal responsibility and is in line with the goal of improving and maintaining infrastructure and facilities and achieving and maintaining financial stability and sustainability,

BACKGROUND

In 2005, the Defense Base Closure Commission recommended the closure of the Riverbank Army Ammunition Plant. This recommendation became law when Congress did not overturn the recommendation.

In 2006, the Riverbank Local Redevelopment Authority ("RLRA") was formed to serve as a single entity responsible for the decisions regarding reuse and development of the property.

In October 2008, the City of Riverbank adopted the Reuse Plan for the conversion of the former military site to civilian use. The Reuse Plan and Homeless Submission were forwarded to the U.S. Army and to the Department of Housing and Urban Development ("HUD") for review and approval in November 2008.

In March 2009, the RLRA received notification of approval from HUD and formal recognition from the Department of Defense ("DoD") as an Implementing Local Redevelopment Authority. This designation authorizes the RLRA to begin to execute the Reuse Plan's guidance for successful reuse of the property.

The RLRA submitted an EDC application for approval to the Army in May 2010. The RLRA received a letter dated December 2012 from the Army and concurrence from the Office of the Secretary of Defense on February 12, 2013, authorizing the use of an Economic Development Conveyance for the transfer of the Riverbank Army Ammunition Plant.

In September 2017, an Economic Development Conveyance Memorandum of Understanding ("EDC MOA") was negotiated to articulate the details and intent of the business deal between the Army and the RLRA. The EDC MOA defines certain rights and obligations of the RLRA and the Army and identifies the requirements, restrictions, reservations, conditions, exceptions and procedures for execution.

On October 17, 2017, the City received the quitclaim deed to Parcel B (24.40 approx acreage) and a bill of sale for certain associated personal property and salvage materials. The RLRA released an RFP for a Master Developer of the Riverbank Industrial Complex after reviewing submittals and interviewing candidates in early 2018, the Board began negotiating a contract with Aemetis. The agreement was executed on December 14, 2021. Aemetis officially took over operations of the Riverbank Industrial Complex in April 2022. Aemetis purchased Parcel B as agreed in July 2022.

The Master Developer Agreement included a sublease to the Army. The current Development Agreement will need to be renegotiated as the terms and conditions will change substantially once Amendment No. 6 is executed. Although Aemetis has committed to purchase Parcel 2 and 2a once conveyed to the City outside the Economic Development Conveyance ("EDC") Memorandum of Agreement ("MOA"), they have not committed to purchase Parcel 1 and 1a once they are conveyed to the City outside the EDC MOA.

UPDATED TERMS

Condition No. 3 - Term of Agreement extended for forty (40) additional years with a new expiration date of March 31, 2066.

Condition No. 4.a.(1) - Interim Lease to terminate upon the Tender of a Quitclaim Deed from the

Army to the City/LRA.

Condition No. 7 - sets forth the requirements for how notice is to be remitted to either party.

Condition No. 8 - Premises shall be subject to the general supervision and approval of the Office of the Assistant Secretary of the Army for Installations, Energy, and Environment, Office of the Deputy Assistant Secretary of the Army for Environment, Safety, and Occupational Health, and the Base Realignment and Closure Directorate.

Condition No. 10.b. - Lessor has conducted an inventory and condition survey of the Leased Premises, including an assessment of environmental conditions, documented an updated Environmental Condition of Property Report, dated January 2026, attached hereto as Exhibit E-1, the "Condition Survey". Preceding expiration, revocation, or termination of the Interim Lease for any reason other than conveyance of the Leased Premises to the Lessee, the Lessor and the Lessee will jointly conduct a close-out survey.

Condition No. 21.a. - Lessee and any sublessee hereunder may only extract or use groundwater from the subsurface of the Leased Premises via wells identified under Water System No. 5000211, attached hereto as Exhibit K-1.

Condition No. 25 — The Lessee will use all reasonable means available to protect the environment and natural resources, and where damage nonetheless occurs from activities of the Lessee, the Lessee shall be liable to restore the damaged resources. Lessee shall submit to the Lessor, and maintain thereafter, an Environmental Compliance Plan within 180 days of the lease extension signature or any modification thereafter, which describes, in detail, the program for environmental management and method of compliance, by the user of any portion of the Leased Premises, whether Lessee, with all Lessor, Federal, State, and local laws and regulations for the use, management, generation, storage, treatment, and disposal of all hazardous waste, hazardous materials, and hazardous substances.

Condition No. 31 — The "Property Management Plan for Land Use Controls, Riverbank Army Ammunition Plant," dated January 2026 (hereafter the "Land Use Control Plan") is attached hereto as Exhibit H-1 and made a part of the Interim Lease. The Lessee is responsible for compliance with and adherence to the Land Use Control Plan and shall provide a copy to all subtenants."

Condition No. 43 - the Lessee or sublessee may encumber its (or their) leasehold interest(s) as well as its (or their) interest(s) in the improvements on the Leased Premises by one or more loans secured by a mortgage. The proposed holder of any such mortgage must be approved by the Government prior to the execution of such loan and, upon such approval, which shall not be unreasonably withheld, shall be referred to herein as the "Mortgagee".

Condition No. 44 - Lessee shall promptly discharge or cause to be discharged valid liens, rights in rem, claims, or demands of any kind, except one in favor of the Government, which at any time may arise or exist as a result of any action of Lessee or any sublessee with respect to the Leased Premises or materials or equipment furnished therefore, or any part thereof, and if the same shall not be promptly discharged by the Lessee, or should the Lessee or sublessee be declared bankrupt or make an assignment on behalf of creditors, or should this leasehold estate be taken by execution, the Government reserves the right to take immediate possession without any liability to the Lessee or any sublessee.

Condition No. 45 - All of the Lessee's obligations under this Interim Lease shall survive foreclosure or other transfer of leasehold interest in an insolvency proceeding and become the obligations of any successor for only those obligations arising during the period of ownership of said successor.

FINANCIAL IMPACT

The financial impact is unknown, although the RLRA has lost grant funding and relies on the annual Aemetis payments under the agreement and support of the General Fund. These costs to provide the administrative oversight required by the Army will continue until final conveyance of the land to the RLRA. The RLRA does have a contract with the Army for some operation and maintenance of the Riverbank Industrial Complex for landscape, security, fire, electrical and well maintenance. It remains a pass through that goes to the Master Developer for reimbursement.

ATTACHMENTS

1. LRA Resolution
2. DACA05-1-21-508 RBAAP Interim Lease SA 6 - DRAFT
3. Exhibit A-1 - Legal Description - RBAAP Leased Premises
4. Exhibit A-2 - RBAAP Leased Premises Map
5. Exhibit E-1 - RBAAP ECP Update 2026
6. Exhibit F-1 - Hazardous Substance Notification
7. Exhibit G-1 - RBAAP PCB Containing Equipment
8. Exhibit H-1 - RBAAP LUC Management Plan 2026
9. Exhibit J-1 - RBAAP Environmental Protection Provisions 2026
10. Exhibit K-1 - RBAAP Water System Details

RIVERBANK LOCAL REDEVELOPMENT AUTHORITY

RESOLUTION 2026-

A RESOLUTION OF THE LOCAL REDEVELOPMENT AUTHORITY BOARD OF THE CITY OF RIVERBANK AUTHORIZING THE CITY MANAGER TO EXECUTE AN INTERIM LEASE AMENDMENT TO THE LEASE NO. DACA05-1-21-508 BETWEEN THE SECRETARY OF THE ARMY AND THE CITY OF RIVERBANK

THE RIVERBANK LOCAL REDEVELOPMENT AUTHORITY (HEREAFTER REFERRED TO AS THE “LRA BOARD”) DOES HEREBY RESOLVE THAT:

WHEREAS, on April 1, 2021, the US Army (hereinafter the “Army”) and the City of Riverbank (hereinafter the “City”) entered into that certain Army Lease No. DACA5-1-21-508 (hereinafter the “Interim Lease”), under authority of Title 10 United States Code section 2667 and Title 10 United States Code section 2667 for the Riverbank Army Ammunition Plant, Stanislaus County, California; and

WHEREAS, the City and the Army entered into Supplemental Agreement No. 1 dated July 22, 2021, Supplemental Agreement No. 2 dated August 15, 2022, Supplemental Agreement No. 3 dated September 27, 2023, Supplemental Agreement No. 4 dated August 14, 2024, and

WHEREAS, City and the Army entered into Supplemental Agreement No. 5 dated March 6, 2025 to exercise the third and final option year allowed by the Interim Lease; and

WHEREAS, the City provided a request letter via letter dated August 27, 2025, to include Parcel No. 4 in the leased premises, extend the lease term so that the City has a sufficient interest in the property to allow for the financing infrastructure improvements on Federal land, and include standard financing terms similar to those provided in Army privatizing housing leases; and,

WHEREAS, the Deputy Assistant Secretary to the Army for Installations, Housing, and Partnerships provided a determination of availability, dated February 19, 2026, for the specific request of Leased Premises; and

WHEREAS, the City would like to extend the term of the Interim Lease for Forty (40) years through March 31, 2066; and,

NOW, THEREFORE, be it resolved that the City Council of the City of Riverbank, reconstituted as the Local Redevelopment Authority Board of Directors hereby authorizes the City Manager to request an extension to the Interim Lease, and upon receipt, execute a Supplemental Agreement No. 6 to extend the term of the Interim Lease through March 31, 2066.

PASSED AND ADOPTED by the Local Redevelopment Authority Board of the City of Riverbank at a meeting held on the 24th day of March, 2026; motioned by Authority Member _____, seconded by Authority Member _____, and upon roll call was carried by the following vote of _____ :

AYES:

NAYS:

ABSENT:

ABSTAIN:

ATTEST:

Gabriela Hernandez,CMC
LRA Secretary

APPROVED:

Rachel Hernandez
Chair

**SUPPLEMENTAL AGREEMENT NO. 6
AMENDING
DEPARTMENT OF THE ARMY
INTERIM LEASE NO. DACA05-1-21-508
UNDER BASE REALIGNMENT AND CLOSURE (BRAC)
FOR THE
FORMER RIVERBANK ARMY AMMUNITION PLANT (RBAAP)
STANISLAUS COUNTY, CALIFORNIA**

THIS SUPPLEMENTAL AGREEMENT NO. 6 is made and entered into by and between the **SECRETARY OF THE ARMY**, on behalf of the United States of America (hereafter the “Lessor”), and the **CITY OF RIVERBANK**, (hereafter the “Lessee”).

RECITALS

WHEREAS, on April 1, 2021, Lessor and Lessee entered into that certain Army Interim Lease No. DACA05-1-21-508, under authority of Title 10, United States Code, Section 2667 for the RBAAP, Stanislaus County, CA (hereinafter the “Lease”); and

WHEREAS, on July 22, 2021, Lessor and Lessee entered into that certain Supplemental Agreement No. 1 to the Lease; and

WHEREAS, on August 15, 2022, Lessor and Lessee entered into that certain Supplemental Agreement No. 2 to the Lease; and

WHEREAS, on September 27, 2023, Lessor and Lessee entered into that certain Supplemental Agreement No. 3 to the Lease; and

WHEREAS, on August 14, 2024, Lessor and Lessee entered into that certain Supplemental Agreement No. 4 to the Lease; and

WHEREAS, on March 6, 2025, Lessor and Lessee entered into that certain Supplemental Agreement No. 5 to the Lease to exercise the third and final option year allowed by Condition No. 3. of the Lease extending the term through March 31, 2026; and

WHEREAS, the Lessee provided a request via letter dated August 27, 2025, to include Army Parcel No. 4 in the Leased Premises, extend the lease term so that the Lessee has a sufficient interest in the property to allow for the financing of infrastructure improvements on Federal land, and include standard financing terms similar to those provided in Army privatized housing leases; and

WHEREAS, the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships provided a determination of availability, dated February 19, 2026, for the specific request of Leased Premises;

NOW THEREFORE, Lease No. DACA05-1-21-508 is modified in the following particulars, but no others:

The term under Condition No. 3. is hereby extended for forty (40) additional years with a new expiration of March 31, 2066.

Condition No. 4.a.(1) shall now read:

“Termination Upon Tender of Deed. Upon the occurrence of either of the following, the passing of sixty (60) days after the Government tenders to Lessee, in accordance with applicable law, a good and sufficient Quitclaim Deed conveying fee title to any portion of the Leased Premises, or the acceptance by the Lessee of the Government tendered Quitclaim Deed, whichever occurs first, the Interim Lease shall automatically terminate as to the portion so conveyed as if such date were the stated expiration date contained herein and neither party shall have any further obligations under the Interim Lease, other than any obligations which otherwise would survive termination of the Interim Lease.”

Condition No. 7. shall now read:

7. NOTICES. Except as provided in paragraph 11.C of Exhibit J-1, all correspondence and notices to be given pursuant to the Interim Lease shall be addressed, if to the Lessee, to Executive Director, Riverbank Local Redevelopment Authority, 5300 Claus Road, Suite 1, Riverbank, California 95367, and if to the Lessor, to the Real Estate Contracting Officer, Attention: Chief, Real Estate Division, U.S. Army Corps of Engineers, Sacramento District, 1325 J Street, Sacramento, California 95814, or as may from time to time otherwise be directed by the parties. Notices must be given (1) in a property sealed envelope, addressed as aforesaid, and deposited postage prepaid by either registered mail, return receipt requested, (2) by certified mail, return receipt requested, in a post office regularly maintained by the United States Postal Service, or (3) by electronic mail to an address directed by the parties. Service of the notice shall be deemed complete upon receipt of said notice, or the refusal thereof, by the party to whom it is addressed.”

Condition No. 8. shall now read:

8. SUPERVISION OF THE LEASED PREMISES. The use and occupancy of the Leased Premises shall be subject to the general supervision and approval of Office of the Assistant Secretary of the Army for Installations, Energy and Environment (ASA-IE&E), Office of the Deputy Assistant Secretary of the Army for Environment, Safety and Occupational Health (DASA-ESOH), Base Realignment and Closure (BRAC) Directorate, hereinafter referred to as “Said Officer,” and to such rules and regulations as may be prescribed from time to time by Said Officer.”

Condition No. 10.b. shall now read:

“b. The Lessor has conducted an inventory and condition survey of the Leased Premises, including an assessment of environmental conditions, documented an updated Environmental Condition of Property Report, dated January 2026, attached hereto as **Exhibit E-1**, the "Condition Survey". Preceding expiration, revocation, or termination of

the Interim Lease for any reason other than conveyance of the Leased Premises to the Lessee, the Lessor and the Lessee will jointly conduct a close-out survey. The Lessor will prepare a close-out report. The Lessee shall fully fund the Lessor's preparation of an updated Condition Survey that will document the environmental condition of the Leased Premises at that time as part of the close-out survey. The close-out survey and report will refer to, and incorporate by reference, the updated Condition Survey. All significant variances from the initial Condition Survey shall be clearly documented in the close-out report. This close-out report will constitute the basis for settlement by the parties for any leased property shown to be lost, damaged, contaminated, or destroyed during the lease term, in determining any environmental restoration requirements to be completed by the Lessee, and restoration of the property as required in Condition No. 17. on RESTORATION.”

Condition No. 21.a. shall now read:

“a. The Lessee and any sublessee hereunder may only extract or use groundwater from the subsurface of the Leased Premises via wells identified under Water System No. 5000211, attached hereto as Exhibit K-1.”

Condition No. 25. shall now read:

“25. ENVIRONMENTAL PROTECTION

The Lessee will use all reasonable means available to protect the environment and natural resources, and where damage nonetheless occurs from activities of the Lessee, the Lessee shall be liable to restore the damaged resources. Neither the Lessee nor any sublessees shall discharge waste or effluent from the Leased Premises in such a manner that the discharge will contaminate streams or other bodies of water or otherwise become a public nuisance. The Lessee must obtain approval in writing from the District Engineer before any pesticides or herbicides may be applied to the Leased Premises.

b. The Lessee shall be solely responsible for obtaining at its own cost and expense any regulatory or environmental permits required for the Lessee's operation under the Interim Lease, independent of any existing Riverbank Army Ammunition Plant (“RBAAP”) permits and shall ensure that its sublessees obtain any environmental or other permit required for their operations and activities. The Lessee shall also be required to obtain its own EPA Identification Number, if applicable.

c. The Lessor's rights hereunder specifically include a right of entry to allow the Lessor, its representatives, agents, employees, and contractors to inspect the Leased Premises for compliance with environmental, safety, and occupational health laws and regulations whether or not the Lessor is responsible for enforcing them, to oversee or inspect on-going environmental remediation and restoration work, or to undertake such work. Such inspections are without prejudice to the right of duly constituted enforcement

officials to make such inspections. The Lessor normally will give the Lessee twenty-four (24) hours prior notice of its intention to enter the Leased Premises unless it determines the entry is required for safety, environmental, operations, or security purposes; provided, however, that the Lessor shall have access to common areas of the Leased Premises at any time during normal working hours and without prior notice to the Lessee. The Lessee shall have no claim against the Lessor, its officers, representatives, agents, employees, or contractors on account of any entries within the Leased Premises made hereunder. Lessor will use reasonable efforts to not interfere with Lessee's activities.

d. The Lessor acknowledges that the RBAAP is on the National Priorities List ("NPL") under the Comprehensive Environmental Response, Conservation and Liability Act of 1980 ("CERCLA"), as amended (42 U.S.C. § 9601 et seq.). The Lessor also acknowledges that RBAAP has been issued a Hazardous Waste Facility Permit by the Department of Toxic Substances Control ("DTSC"). The Lessee acknowledges that the Lessor has provided it with a copy of the RBAAP Federal Facility Agreement ("FFA"), dated April 5, 1990, the Hazardous Waste Facility Permit, dated May 6, 2006, and any subsequent modifications to both documents. For so long as the Property remains subject to the FFA and any permits, the Lessee agrees that they will not interfere with the United States Department of the Army activities required by the FFA and any permits. In addition, should any conflict arise between the FFA and any permits, as they presently exist or may be amended, and the provisions of the Interim Lease, the FFA provisions shall take precedence. The Lessee further agrees that notwithstanding any other provision of the Interim Lease, the Lessor assumes no liability to the Lessee should implementation of the FFA or any permits interfere with the Lessee's use of the Leased Premises. The Lessee shall have no claim against the Lessor or its officers, agents, employees, or contractors on account of any such interference, other than for abatement of rent.

e. The Lessee shall submit to the Lessor, and maintain thereafter, an Environmental Compliance Plan within 180 days of the lease extension signature or any modification thereafter, which describes, in detail, the program for environmental management and method of compliance, by the user of any portion of the Leased Premises, whether Lessee, with all Lessor, Federal, State, and local laws and regulations for the use, management, generation, storage, treatment, and disposal of all hazardous waste, hazardous materials, and hazardous substances. Each Environmental Compliance Plan for a portion of the Leased Premises, or request for waiver of the requirement for a plan due to the non-hazardous nature of the proposed use, must be submitted and approved in writing by the Lessor prior to occupancy of the intended portion of the Leased Premises. Thereafter, each such Environmental Compliance Plan shall be incorporated in the Lease and shall be included as an exhibit in the relevant sublease(s). The Lessee shall be responsible for the overall compliance of its operations. The Lessee shall be responsible for ensuring the preparation of all documents, records, and reports associated with the environmental compliance of its operation. No liability or responsibility shall attach to the Leased Premises or the Lessor as a result of the Lessor's review and approval of the Environmental Compliance Plan under this paragraph. The Lessee further agrees that in the event of any assignment or sublease of the Leased Premises, it shall

provide to the EPA Region 9, the DTSC, and the RWQCB Central Valley Office a copy of the assignment or sublease of the Leased Premises, by certified mail, within fourteen (14) days after the effective date of such transaction. The Lessee may delete the financial terms and any other propriety information from the copy of any assignment or sublease furnished pursuant to this condition.

f. The Lessor, the EPA, the California Department of Toxic Substances Control, and the Central Valley Regional Water Quality Control Board, their officers, agents, employees, contractors, and subcontractors are granted a right hereunder to enter upon the Leased Premises, upon reasonable notice to the Lessee, for purposes consistent with the applicable provisions of the FFA and for the following purposes:

(1) to conduct investigations and surveys, including, where necessary, drilling, soil and water sampling, test pitting, soil boring tests, and other activities related to the RBAAP Installation Restoration Program (IRP), FFA, and related environmental requirements;

(2) to inspect field activities of the Lessor and its employees, agents, contractors, and subcontractors in implementing the IRP, FFA, or related environmental requirements;

(3) to conduct any test or survey required by the EPA the California Department of Toxic Substances Control, or the Central Valley Regional Water Quality Control Board relating to the implementation of the FFA or environmental conditions at the Leased Premises, or to verify any data submitted to the EPA, the California Department of Toxic Substances Control, or the Central Valley Regional Water Quality Control Board by the Lessor relating to such conditions; and

(4) to construct, operate, or maintain any other response or remedial action as required or necessary under the IRP or FFA including, but not limited to, monitoring wells, soil removal, pumping wells, and treatment facilities.

g. The Lessee agrees to comply with the provisions of any health or safety plan in effect under the FFA during the course of any above-described response or remedial action. Any inspection, survey, investigation, or other response or remedial action will, to the extent practicable, be coordinated with the Lessee. The Lessor will use reasonable efforts to not interfere with Lessee's activities. The Lessee shall have no claim against the Lessor or any of its officers, agents, employees, contractors, or subcontractors on account of such entries. In addition, the Lessee shall comply with all applicable Federal, state, and local occupational safety and health regulations.

h. The Lessee shall comply with the requirements of 10 U.S.C. § 2692(b)(9) and (10) to obtain the Lessor's approval for the storage, treatment, or disposal of any toxic or hazardous materials not owned by the Department of Defense on the Leased Premises.

SUPPLEMENTAL AGREEMENT NO. 6
TO DEPARTMENT OF THE ARMY
INTERIM LEASE NO. DACA05-1-21-508

i. The Lessee and its sublessees shall comply with the hazardous waste permit requirements under the Resource Conservation and Recovery Act (RCRA), or the State of California equivalent, and all other applicable environmental laws, rules, and regulations. Except as specifically authorized by the Lessor in writing, the Lessee and its sublessees must provide, at their own expense, such hazardous waste management facilities, including storage, treatment, or disposal facilities, complying with all applicable laws and regulations, as may be required. Hazardous waste management facilities of the Lessor will not be available to the Lessee. Any violation of the requirements of this provision shall be deemed a material breach of this Interim Lease.

j. Any of Lessor's accumulation points for hazardous and other wastes shall not be used by the Lessee. The Lessee shall not permit its hazardous waste, or that of any sublessee or licensee, to be commingled with hazardous waste of the Lessor.

k. Should the Lessor provide any personnel or equipment, whether for initial fire response and/or spill containment, or otherwise at the request of the Lessee, or because the Lessee was not, in the opinion of the Lessor, conducting timely cleanup actions, the Lessee hereby agrees to reimburse the Lessor for its reasonable response costs. The Lessee's hazardous waste, fuel and chemical spill response plan may be augmented to reflect changes in the Lessee's use, or its sublessees' use, of toxic, hazardous, or dangerous materials. Each sublessee shall provide the Lessee with individual emergency response and clean-up plans for its activities within its subleased portion of the Leased Premises prior to commencement of the sublessee's operations. Sublessees' individual plans will be incorporated by the Lessee into its overall plan.

l. The Lessee shall not construct or make, or permit its sublessees, licensees or assigns, to construct or make any substantial alterations, additions, or improvements to or installations upon or otherwise modify or alter the Leased Premises in any way which may adversely affect the Lessor's investigations, restoration, or human health or the environment without prior written consent of the Lessor. Such consent may include a requirement to provide the Lessor with a performance and payment bond and such other requirements as may be deemed necessary to protect the interests of the Lessor. Except as such written approval shall expressly provide otherwise, all such approved alterations/additions/modifications, with the exception of any improvements that are lender-financed and required as security, shall become the Lessor's property when annexed to the Leased Premises.

m. The Lessee shall not conduct or permit its sublessees to conduct any subsurface excavation, digging, drilling, or other disturbance of the surface without the prior written approval of the Lessor."

Condition No. 26. shall be changed to Condition No. 26.a. and a new Condition No. 26.b. shall be added to read:

"b. The Lessee shall provide the Lessor with information regarding the types,

conditions, and quantities of toxic or hazardous materials (as listed in 29 CFR 1910 Subpart Z Toxic and Hazardous Substances) that may be temporarily stored, treated, or disposed of on the premises and hold the Lessor harmless from any and all liability for the same in accordance with Condition No. 16. of the Interim Lease.”

Condition No. 31. shall now read:

“31. LAND USE CONTROLS. The "Property Management Plan for Land Use Controls, Riverbank Army Ammunition Plant," dated January 2026 (hereafter the "Land Use Control Plan") is attached hereto as **Exhibit H-1** and made a part of the Interim Lease. The Lessee is responsible for compliance with and adherence to the Land Use Control Plan and shall provide a copy to all subtenants.”

Condition No. 43. shall be added to read:

“43. MORTGAGE OF LEASEHOLD PREMISES

a. Except as herein provided, the Lessee or sublessee shall not: (a) engage in any financing or other transaction creating any mortgage upon the Leased Premises; (b) place or suffer to be placed upon the Leased Premises any lien or other encumbrance; or (c) suffer any levy or attachment to be made on the Lessee's interest in the Leased Premises; any such mortgage, encumbrance or lien shall be deemed a violation of this covenant on the date of its execution or filing of record, regardless of whether or when it is foreclosed or otherwise enforced.

b. During the term of the Interim Lease, the Lessee or sublessee may encumber its (or their) leasehold interest(s) as well as its (or their) interest(s) in the improvements on the Leased Premises by one or more loans secured by a mortgage. The proposed holder of any such mortgage must be approved by the Government prior to the execution of such loan and, upon such approval, which shall not be unreasonably withheld, shall be referred to herein as the "Mortgagee". Notwithstanding any foreclosure, the Lessee shall remain liable for the performance of all obligations of the Interim Lease, which by the terms hereof are to be carried out and performed by the Lessee, and any approved sublease shall remain subject to the terms and conditions of the Interim Lease in accordance with Condition No. 11.b.

c. The Lessee shall notify the Government promptly of any lien or encumbrance which has been created or attached to the improvements or the Lessee's or sublessee's interest in the improvements, whether by act of the Lessee or sublessee or otherwise, of which the Lessee or the sublessee itself has notice. If a Mortgagee or purchaser at foreclosure of the mortgage shall acquire the Lessee's or sublessee's interest in the improvements by virtue of the default by the Lessee or sublessee under the mortgage or otherwise, the Interim Lease shall continue in full force and effect so long as the Mortgagee or purchaser at foreclosure is not in default hereunder. The Mortgagee or purchaser at foreclosure may not appoint an agent or nominee to operate the Interim

Lease on its behalf without obtaining the prior written approval of the Lessor. For the period of time during which the Mortgagee or any purchaser at foreclosure of a mortgage holds the Lessee's or sublessee's interest, the Mortgagee or such purchaser shall become liable and fully bound by the provisions of the Interim Lease for those obligations arising during the period of ownership of said Mortgagee or purchaser.

d. In no event shall the right granted herein to the Lessee or sublessee to mortgage or otherwise encumber Lessee's or sublessee's leasehold interest, created by and pursuant to the Interim Lease, be deemed or interpreted as a subordination of the Government's interest in the Leased Premises to the lien of such mortgage or encumbrance, it being expressly agreed that under no circumstances shall the Lessee or sublessee have the right to mortgage or encumber the interest of the Government in the Leased Premises or subordinate such interests to the lien of any mortgage or encumbrance that Lessee or sublessee may place upon its leasehold state created by and pursuant to the Interim Lease.

e. The Government consents to Lessee's or its sublessee's grant, if any, to the Mortgagee of a security interest in any fixtures, equipment, inventory and/or other personal property owned by the Lessee or its sublessees and located on the Leased Premises. The Government hereby waives any interest that the Government may have in such personal property, by virtue of the Interim Lease.

f. Any mortgages, liens, encumbrances or other interests created pursuant to Condition No. 43. shall not be subject to the provisions of Condition No. 44.

g. Estoppels Certificates. Provided the facts support such a statement, Government and Lessee shall within 10 days of written request by the other, certify by written instrument as to the following:

(5) That the Interim Lease as modified is in full force and effect;

(6) That no default has occurred under the Interim Lease which has not been waived, and no event has occurred which, but for the passage of time and/or the giving of notice, would constitute a default under the Interim Lease;

(7) That to their best knowledge, there are no existing claimed set-offs or defenses against the enforcement of any of the agreements, terms, covenants or conditions of the Interim Lease and any modifications of the Interim Lease on the part of the other party to be performed or complied with; and

(8) The date of expiration of the term.”

Condition No. 44. shall be added to read:

“44. LIENS. Subject to Condition No. 43. above, the Lessee shall promptly

discharge or cause to be discharged valid liens, rights in rem, claims, or demands of any kind, except one in favor of the Government, which at any time may arise or exist as a result of any action of Lessee or any sublessee with respect to the Leased Premises or materials or equipment furnished therefore, or any part thereof, and if the same shall not be promptly discharged by the Lessee, or should the Lessee or sublessee be declared bankrupt or make an assignment on behalf of creditors, or should this leasehold estate be taken by execution, the Government reserves the right to take immediate possession without any liability to the Lessee or any sublessee. The Lessee shall be responsible for all costs incurred by the Government in securing clear title to its property.”

Condition No. 45. shall be added to read:

“45. LESSEE OBLIGATION SURVIVAL. All of the Lessee’s obligations under this Interim Lease shall survive foreclosure or other transfer of leasehold interest in an insolvency proceeding and become the obligations of any successor for only those obligations arising during the period of ownership of said successor.”

All references to “District Engineer” are deleted and replaced with “Real Estate Contracting Officer.”

Exhibit “A” is deleted in its entirety and replaced with **Exhibit “A-1”** and **Exhibit “A-2”** attached hereto and made a part hereof.

Exhibit “E”, and any reference to Exhibit “E”, is deleted in its entirety and replaced with **Exhibit “E-1”** Environmental Condition of Property Report Update attached hereto and made a part hereof.

Exhibit “F” is deleted in its entirety and replaced with **Exhibit “F-1”** Hazardous Substance Notification attached hereto and made a part hereof.

Exhibit “G” is deleted in its entirety and replaced with **Exhibit “G-1”** PCB & PCB-Contaminated Transformers and Equipment attached hereto and made a part hereof.

Exhibit “H” is deleted in its entirety and replaced with **Exhibit “H-1”** Land Use Control Plan attached hereto and made a part hereof.

Exhibit “J”, and any reference to Exhibit “J”, is deleted in its entirety and replaced with **Exhibit “J-1”** Environmental Protection Provisions attached hereto and made a part hereof.

SUPPLEMENTAL AGREEMENT NO. 6
TO DEPARTMENT OF THE ARMY
INTERIM LEASE NO. DACA05-1-21-508

Said Lease is amended in the above particulars only. All other terms and conditions of the Lease shall remain in full force and effect and this Supplemental Agreement No. 6 shall henceforth be considered a part of the said Lease as if fully and completely written therein.

IN WITNESS WHEREOF, I have hereunto set my hand by authority of the Secretary of the Army this _____ day of _____ 2026.

By: _____
ADAM B. OLSON
Chief, Real Estate Division
Real Estate Contracting Officer
USACE Sacramento District

This Supplemental Agreement No. 6 to Interim Lease No. DACA05-1-21-508 is hereby executed by the Lessee this _____ day of _____ 2026.

By: _____
MARISELA H. GARCIA
City Manager
City of Riverbank

EXHIBIT A-1

**Lease Description
U.S. Tract No. A (South Portion)**

**Riverbank Army Ammunition Plant
Stanislaus County, California**

LAND DESCRIPTION

All that real property located in Lots 2, 3, and 4 of Section 31, Township 2 South, Range 10 East, Mount Diablo Baseline & Meridian in the County of Stanislaus, State of California, containing 112.02 acres, more or less, and described as follows:

A portion of that real property transferred by Quitclaim Deed on the 29th day of October, 1948, Document No. 22667 from the Reconstruction Finance Corporation to the United States of America filed in the Office of the Recorder of Stanislaus County described as follows:

Beginning at 2" Iron Pipe and Cap in a Monument Well marking the Southwest corner of Section 31, said corner also being the Southwest Corner of Township 2 South, Range 10 East of the Mount Diablo Baseline and Meridian. Thence leaving said Section corner and going with West line of Section 31 the following call:

North 00 degrees 30 minutes 19 seconds West, 2642.77 feet, more or less, to a Brass Cap in a Monument Well, being a point located in the southwest corner of Lot 2 Section 31 T 2 South, R 10 East of the Mount Diablo Baseline. Thence continuing with said section line the following call:

North 00 degrees 30 minutes 14 seconds West 358.62 feet, more or less, to the intersection of the west line and the southerly line of the Hetch Hetchy Water Supply Right of Way as described in the deed from R.C. Huper to the City and County of San Francisco, dated November 21, 1923 and recorded February 13, 1924 in Volume 56, Page 71 of the Official Records of Stanislaus County. Thence going with the southerly line of said ROW, the following two calls:

- (1) North 61 degrees 07 minutes 25 seconds East 1256.49 feet, more or less,
- (2) North 70 degrees 13 minutes 37 seconds East 354.43 feet, more or less,

Thence leaving said ROW line and going the following two calls:

- (1) South 00 degrees 30 minutes 33 seconds East 3,357.78 feet, more or less,
- (2) South 00 degrees 30 minutes 42 seconds East 368.26 feet, more or less, to a point in the southerly line of Section 31.

Thence going with said southerly section line the follow call:

South 89 degrees 55 minutes 11 West 2755.40 feet, more or less, back to the POB

Containing 112.02 acres, more or less.

EXHIBIT A-1

**Lease Description
U.S. Tract No. A (North Portion)**

**Riverbank Army Ammunition Plant
Stanislaus County, California**

LAND DESCRIPTION

All that real property located in Lot 2 of Section 31, Township 2 South, Range 10 East, Mount Diablo Baseline & Meridian in the County of Stanislaus, State of California described as follows:

A portion of that real property transferred by Quitclaim deed on the 29th day of October, 1948, Document No. 22667 from the Reconstruction Finance Corporation to the United States of America filed in the Office of the Recorder of Stanislaus County described as follows:

Commencing at a 2" Iron Pipe and Cap in a Monument Well Marking the Southwest corner of said Lot 2, said corner also being the West $\frac{1}{4}$ Corner of said Section 31; thence N $00^{\circ}30'14''$ W, a distance of 483.86 feet along the West line of said Section 31 to the Point of Beginning, said point of beginning also being the intersection of the said west line and the North line of the Hetch Hetchy Water Supply Right of Way as described in the deed from R.C. Huper to the City and County of San Francisco, dated November 21, 1923 and recorded February 13, 1924 in Volume 56, Page 71 of the Official Records of Stanislaus County. Thence leaving said Point of Beginning and going with the North line of said Hetch Hetchy Right of Way the following call:

North 61 degrees 07 minutes 25 seconds East 56.88 feet, more or less, to a point in the Easterly Right of Way line of Claus Road. Thence continuing along said North line of said Hetch Hetchy Right of Way the following two calls,

- (1) North 61 degrees 07 minutes 25 seconds East 692.16 feet, more or less,
- (2) North 15 degrees 47 minutes 52 seconds West 20.89 feet, more or less,
- (3) North 28 degrees 00 minutes 19 seconds West 257.56 feet, more or less,
- (4) South 48 degrees 24 minutes 02 seconds West 643.00 feet, more or less, to the Easterly Right of Way line of Claus Road.

Thence continuing on the previous line the following call,

South 48 degrees 24 minutes 02 seconds West 66.41 feet, more or less, to a point in the West line of Section 31. Thence going with said West line the following call,

South $00^{\circ}30'14''$ East 138.24 feet, more or less, back to the Point of Beginning.

Containing 3.25 acres, more or less.

EXHIBIT A-1

Lease Description
U.S. Tract No. A-106, A-107, A-108

Riverbank Army Ammunition Plant
Stanislaus County, California

LAND DESCRIPTION

All that portion of Lot 406 of the Re-plat of the Rush Addition as shown on the map thereof, filed on the 11th day of August, 1914 in Volume 8, Page 18 of the Official Records of Stanislaus County, described as follows:

For a Point of Commencement (POC), go to a point at the intersection of the northerly line of said Lot 406 and the Northwesterly line of the State Highway; reference the survey plat described above for a depiction of said northwesterly line and state highway. Thence going with said northerly lot line the following call:

South 89 degrees 35 minutes 00 seconds West 138.00 feet to a point in the common line of U.S. Tract Nos. A-106 and A-107. Said point being located in the common line between Lots 406 and 407 and being the **Point of Beginning (POB)** of this description. Thence leaving U.S. Tract No. A-107 and going with the easterly line of U.S. Tract No. A-106 the following two calls:

- (1) South 04 degrees 36 minutes 00 seconds West 320.00 feet, more or less.
- (2) North 89 degrees 35 minutes 00 seconds East 22.00 feet, more or less, to the Northwesterly line of said highway.

Thence along said northwesterly line the following three calls:

- (1) South 16 degrees 05 minutes 00 seconds West 437.41 feet, more or less,
- (2) A curve to the right whose radius is 270.00 feet, having a central angle of 30°30'00" and a length of 143.73 feet,
- (3) South 46 degrees 35 minutes 00 seconds West 200.32 feet, more or less, to a point in the most southerly corner of U.S. Tract No. A-106.

Thence leaving said corner and going with the westerly line of U.S. Tract No. A-106 the following six calls:

- (1) North 26 degrees 12 minutes 00 seconds West 228.77 feet, more or less,
- (2) North 02 degrees 29 minutes 00 seconds West 124.87 feet, more or less,
- (3) North 13 degrees 23 minutes 00 seconds West 299.77 feet, more or less,
- (4) North 07 degrees 08 minutes 00 seconds West 224.80 feet, more or less,

- (5) North 01 degrees 38 minutes 00 seconds East 129.85 feet, more or less,
- (6) North 04 degrees 03 minutes 00 seconds West a distance 19.47 feet to the westerly common corner of U.S. Tract Nos. A-106 and A-107 being also a point in the common line of Lots 406 and 407,

Thence leaving U.S. Tract No. A-106 and going with the westerly line of U.S. Tract No. A-107 the following three calls:

- (1) North 04 degrees 03 minutes 00 seconds West 180.57 feet, more or less,
- (2) North 17 degrees 14 minutes 00 seconds West 85.05 feet, more or less,
- (3) North 03 degrees 40 minutes 00 seconds West 55.47 feet, more or less, to a point in the common line between Lot 407 and 408.

Thence leaving Lot 40 and continuing with the westerly line of U.S. Tract No. A-107 the following four calls:

- (1) North 03 degrees 40 minutes 00 seconds West 100.59 feet, more or less
- (2) North 15 degrees 27 minutes 00 seconds West 150.07 feet, more or less,
- (3) North 19 degrees 41 minutes 00 seconds East 70.01 feet, more or less,
- (4) North 04 degrees 06 minutes 00 seconds East 79.02 feet, more or less, to a point in the common line between Lot 408 and 409.

Thence leaving Lot 408 and continuing with the westerly line of U.S. Tract No. A-107 the following two calls:

- (1) North 04 degrees 06 minutes 00 seconds East 285.92 feet, more or less,
- (2) North 00 degrees 47 minutes 00 seconds East 215.95 feet, more or less, to the Westerly common corner of U.S. Tract Nos. A-107 and A-108.

Thence leaving U.S. Tract No. A-107 and going with the westerly line of U.S. Tract No. A-108 the following three calls:

- (1) North 00 degrees 47 minutes 00 seconds East 284.46 feet, more or less,
- (2) North 24 degrees 08 minutes 00 seconds East 145.18 feet, more or less,
- (3) North 01 degrees 34 minutes 00 seconds East 107.18 feet, more or less, to the northwest corner of U.S. Tract No. A-108.

Thence leaving said westerly line and going with the northerly line of said U.S. Tract the following call:

North 89 degrees 36 minutes 45 seconds East 247.48 feet, more or less, to a point in the northeasterly corner of said U.S. Tract. Thence leaving said northerly line and going with the easterly line of U.S. Tract No. A-108 the following call:

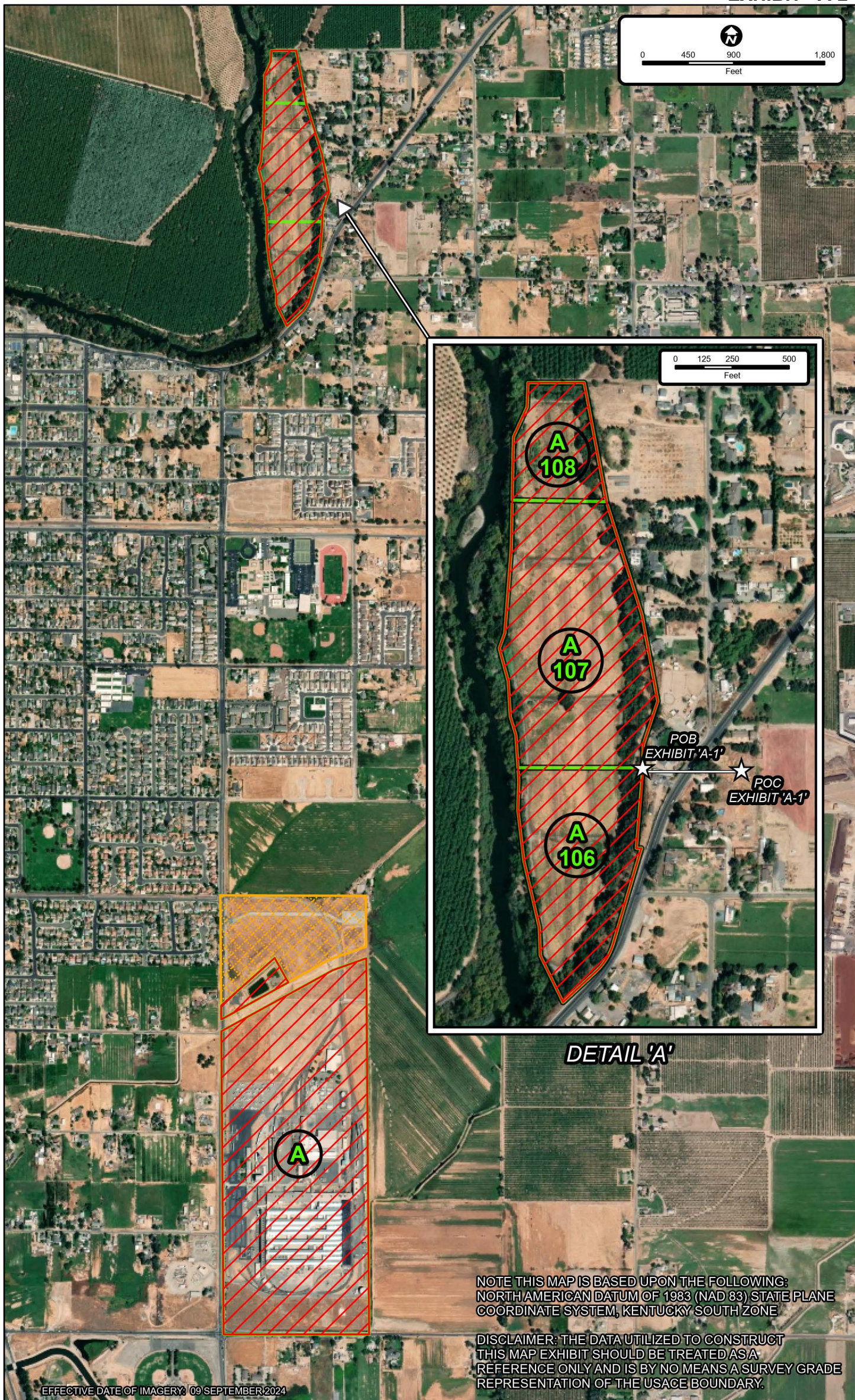
South 10 degrees 55 minutes and 00 seconds East 532.30 feet, more or less, to a point in the easterly common corner of U.S. Tract No. A-107 and A-108, being a point in the common line of Lots 410 and 409. Thence leaving U.S. Tract No. A-108 and going with the Easterly line of U.S. Tract No. A-107 the following call:




South 17 degrees 45 minutes 00 seconds East 524.00 feet, more or less, to a point in the common line of Lots 408 and 409. Thence leaving Lot 409 and continuing with the easterly line of said U.S. Tract the following call:

South 10 degrees 43 minutes 00 seconds East 382.90 feet, more or less, to a point in the common line of Lots 407 and 408. Thence leaving Lot 408 and continuing with the easterly line of U.S. Tract No. A-107 the following two calls:

- (1) South 17 degrees 59 minutes 30 seconds West 201.70 feet, more or less,
- (2) South 01 degrees 10 minutes 00 seconds West 139 feet, more or less, to a point in the easterly common corner of U.S. Tract Nos. A-107 and A-106, also being a point in the common line of Lots 406 and 407. Said point, also being the **POB**.


Containing 28.84 Acres, more or less



LEGEND	
	Leased Premises (144.18 acres)
	USACE Fee Tracts
	Disposed (2017)

RIVERBANK ARMY AMMUNITION PLANT
 U.S. TRACT NOS. A, A-106, A-107, & A-108
 STANISLAUS COUNTY, CALIFORNIA

**US ARMY CORPS
 OF ENGINEERS**
 BASE REALIGNMENT
 AND CLOSURE



Environmental Condition of Property Update Report

Riverbank Army Ammunition Plant

Riverbank, California

Prepared by:

Office of the Deputy Assistant Secretary of the Army
for Environment, Safety and Occupational Health (ESOH)

Base Realignment and Closure (BRAC)

January 2026

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Appendices

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Acronyms

µg/L	micrograms per liter
ACM	Asbestos Containing Materials
AOC	Area of Concern
AM	Action Memorandum
AR	Army Regulation
ASTM	American Society for Testing and Materials
bgs	below ground surface
BRAC	Base Realignment and Closure
BTEX	benzene, toluene, ethylbenzene and xylene
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
COC	Chemical of Concern
CSM	Conceptual Site Model
DTSC	Department of Toxic Substances Control
ECP	Environmental Condition of the Property
EDC	Economic Development Conveyance
EDR	Environmental Data Resources
E/P	evaporation/percolation
EPA	U.S. Environmental Protection Agency
ESCA	Environmental Services Cooperative Agreement
ESD	Explanation of Significant Differences
EW	Extraction Wells
FeSO ₄	Ferrous Iron Sulfate
FYR	Five Year Review
FOSET	Finding of Suitability for Early Transfer
FOST	Finding of Suitability for Transfer
FS	Feasibility Study
GMP	Groundwater Monitoring Program
GW	Groundwater
GWTP	Groundwater Treatment Plant
GWTS	Groundwater Treatment System
HFCS	high fructose corn syrup
IRP	Installation Restoration Program
IWTP	Industrial Wastewater Treatment Plant
LBP	Lead Based Paint
LUC	Land Use Control

LUCRD	Land Use Control Remedial Design
MCL	Maximum Contaminant Level
mg/kg	milligrams/kilogram
MW	Monitoring Wells
NCC	North County Corridor
NFA	No Further Action
NPL	National Priorities List
OID	Oakdale Irrigation District
PA/SI	Preliminary Assessment/Site Inspection
PCB	polychlorinated biphenyl
PFC	Perfluorinated Chemicals
PPM	part per million
RBAAP	Riverbank Army Ammunition Plant
REC	Recognized Environmental Condition
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
RLRA	Riverbank Local Redevelopment Authority
ROD	Record of Decision
RSLs	Regional Screening Levels
SLERA	Screening level ecological risk assessment
SWMU	Solid Waste Management Unit
TPH	total petroleum hydrocarbons
TCRA	Time Critical Removal Action
TSCA	Toxic Substances Control Act
UFP-QAPP	Uniform Federal Policy - Quality Assurance Project Plan
USACE	U.S. Army Corps of Engineers
UST	underground storage tank
VOCs	Volatile Organic Compounds
WDR	Waste Discharge Requirements

1.0 INTRODUCTION

The Army performed an Environmental Condition of Property (ECP) Update for the former Riverbank Army Ammunition Plant (also referred to as the “Property” throughout this document) in accordance with Army Regulation (AR) 200-1 and applicable American Society for Testing and Materials (ASTM) standards. Under ASTM D 6008-22 (reapproved, 2022) *Standard Practice for Determining the Environmental Condition of Federal Property*, the following components were completed: site reconnaissance, records review, and certification by the environmental professional responsible for the assessments (see Section 8.0).

The former Riverbank Army Ammunition Plant (RBAAP) is located at 5300 Claus Road, Riverbank, Stanislaus County, California, one mile south of the Stanislaus-San Joaquin County border and approximately five miles northeast of the city of Modesto. RBAAP occupied a total of 168 acres of land. It consists of two noncontiguous areas represented by the main plant area (approximately 139.2 acres) and the evaporation/percolation (E/P) ponds (28.8 acres). The main plant area of the Property was broken into six parcels and denominated: A, B, 1, 1A, 2, and 2A¹. The E/P ponds is the seventh parcel and is Parcel 4. Parcel B was transferred to the Riverbank Local Redevelopment Authority (RLRA) in September 2017. A parcel map of the former RBAAP is presented as Figure 1. This ECP Update evaluates only the current Army-owned property of the former RBAAP, as shown on Figure 1. The Army leased Parcels A, 1, 1A, 2 and 2A of the former RBAAP property to the RLRA for industrial/commercial reuse. The RLRA is responsible for maintenance, utilities and security of RBAAP.

This document reflects changes and updates from the May 2019 ECP Update Report for Parcels A, 1, 1A, 2, 2A and 4 (Army, 2019). A Finding of Suitability for Early Transfer (FOSET) is being prepared for all parcels in this ECP Update. A brief description of each of these parcels is below.

- Parcel A occupies 77.67 acres and includes most of the industrial buildings and facilities at RBAAP, as well as the Northwest Storm Water Reservoir. The Northwest Storm Water Reservoir is 3.25 acres and temporarily stores storm water from the industrial areas on Parcel A after rain events. Parcel A and the Northwest Storm Water Reservoir will be transferred to the RLRA through an Economic Development Conveyance (EDC). Updates to this parcel include updated soil and groundwater sampling results and Polychlorinated Biphenyl (PCB) contamination removal actions. All updates are described within this ECP Update Report.
- Parcel 1 is 8.46 acres and Parcel 1A is 4.37 acres. Parcels 1 and 1A are located south of and adjacent to Parcel A. The parcels were used for employee parking while RBAAP was operational. Remediation activities related to PCB releases are underway at this parcel. These parcels will be disposed of through a Negotiated Sale.

¹ RBAAP was originally divided into parcels to facilitate transfer of areas as they became eligible for transfer. The Parcels now designate specific Land Use Controls but the entire property will now transfer under Early Transfer Authority as one parcel.

- Parcel 2 is 18.3 acres and is mostly open space. Parcel 2 is north of and adjacent to Parcel A, and south and southeast of the northwest storm water reservoir site. A FOST was prepared for Parcel 2 in 2013 and again in 2024, but transfer did not occur. Parcel 2 will be sold via a Negotiated Sale to the RLRA for reuse. A separate ECP was finalized for this Parcel on March 26, 2024 (Army, 2024).
- Parcel 2A is 3.3 acres. It is north and adjacent to Parcel A, and south of Parcel 2. Parcel 2A is used for storage of mobile homes and recreational vehicles. Several monitoring and extraction wells which support the Installation Restoration Program (IRP) sites (RBAAP-01 and RBAAP-03) remain in place on this parcel. This parcel will be conveyed under the FOSET due to the original groundwater contamination plume related to IRP site RBAAP-03. It will be sold via a Negotiated Sale to the RLRA for reuse.
- Parcel 4 (E/P ponds) was used for disposal of treated industrial wastewater from the former Industrial Wastewater Treatment Plant (IWTP) and is currently designed to receive treated discharge from the Groundwater Treatment Plant (GWTP) located on Parcel A when in operation. Parcel 4 is located approximately 1.5 miles north of RBAAP adjacent to but separated from the Stanislaus River by an elevated levee system. When the GWTP is operational, treated wastewater is piped from the GWTP on Parcel A to the E/P Ponds. The sale of Parcel 4 will include an Army flowage easement allowing disposal of GWTP effluent to the E/P Ponds for as long as the groundwater treatment system is required to operate. This parcel will be disposed of through Negotiated Sale.

2.0 BACKGROUND

The U.S. Army BRAC 2005 *Environmental Condition of Property Report, Riverbank Army Ammunition Plant, Riverbank, CA* was completed in November 2006 (CH2M Hill, 2006)². It is referenced as the “2006 ECP Report” throughout this document. The purpose of the 2006 ECP Report was to characterize the existing environmental conditions at RBAAP. It met the requirements of Title 40, Code of Federal Regulations (CFR) § 373.1; the Base Redevelopment and Realignment Manual DoDI 4165.66-M, AR 200-1; and closely parallels ASTM 6008-96 (2014) (now ASTM 6008-22). It was reviewed and found to meet the requirements set forth in 4.6.2 of ASTM D 6008-22 and the narrative discussion and findings of that report are incorporated by reference into this report as if contained here in its entirety.

Property is categorized in ECP reports into one of seven categories. The Area Types defined in the ASTM D5746 – 98 (Reapproved 2016) *Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities* (ASTM 2016). The seven ECP Area Types are as follows:

- Type 1: An area or parcel of real property where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred

². CH2M Hill, 2006. *U.S. Army BRAC 2005 Environmental Condition of Property Report, Riverbank Army Ammunition Plant, Riverbank, California*. Prepared for United States Army by CH2M Hill, Santa Ana, California. November 17.

(including no migration of these substances from adjacent properties).

- Type 2: An area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred.
- Type 3: An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
- Type 4: An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, and all remedial actions necessary to protect human health and the environment have been taken.
- Type 5: An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred and removal or remedial actions, or both, are under way, but all required actions have not yet been taken.
- Type 6: An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but required response actions have not yet been initiated.
- Type 7: An area or parcel of real property that is unevaluated or requires additional evaluation.

The 2006 ECP Report classified the study sections of the property into one of seven ECP categories. A total of 45.71 acres were classified as Category 1. The U.S. Environmental Protection Agency (EPA) Region IX concurred with the uncontaminated property designations on 4 May 2007 (via email). The remaining acreage was broken into the other six ECP categories.

An ECP Update Report for all the remaining Army owned RBAAP property was completed in 2019 and is referred to as the “2019 ECP Update Report” throughout this document. Table 1 compares the ECP categories between the 2019 and 2021 ECP Update Reports and this ECP Update Report. Other ECP Updates were prepared in 2017 and 2024 (Army 2017a, Army 2017b, Army 2024) and narratives are incorporated into this ECP Update.

3.0 SITE RECONNAISSANCE

A site reconnaissance for this ECP Update Report was performed to characterize on-site conditions and assess surrounding property uses and natural surface features that may have affected conditions of RBAAP. In addition, a reconnaissance was conducted of the surrounding roads and readily accessible adjacent properties to identify obvious potential environmental conditions. Photographs taken as part of the site reconnaissance are provided in Appendix A. The site reconnaissance took place on September 16-18, 2025. All the site reconnaissance actions were conducted by the RBAAP BRAC Environmental Coordinator in a systematic manner focusing initially on the property boundaries and then the structures.

During the site reconnaissance, no obvious potential environmental issues were observed on the adjacent properties. The site conditions during the reconnaissance reflect the conditions described in the sections below.

4.0 INTERVIEWS

There were no new interviews completed for this update.

5.0 RECORDS REVIEW

A review of environmental documentation was conducted to support the preparation of transfer documents for the RBAAP. All known records and information associated with the environmental condition of the subject property have been documented in the 2006 ECP Report, 2017, 2019, and 2024 ECP Update Reports, with the exception of subsequent investigations of groundwater contamination, changes to the groundwater remedial approach, the Final 2021 Five Year Review (FYR) and other investigations described below.

Explanation of Significant Differences (ESD) #2: ESD #2 is in Draft Final status. ESD #2 formalizes restrictions on Parcels A, B, 1, 1A, 2, and 2A. Restrictions in the Draft Final ESD #2 include: the prohibition of residential reuse on Parcels A, 1, 1A, 2, and 2A; a sitewide groundwater restriction; a soil disturbance and soil management plan requirement for Parcels A, 1, 1A, 2A and the NW Storm Water Reservoir; site-wide restrictions on disturbing remedial activities; and land use controls to maintain the integrity of the landfill cap located on Parcel A. The ESD #2 is expected to be signed in 2nd Quarter FY2026.

Land Use Control Remedial Design (LUCRD): The LUCRD required by the ESD #2 is in draft form and under review. This formally documents how the Army will implement the restrictions selected in the ESD #2 on the Parcels A, B, 1, 1A, 2, and 2A.

Groundwater Reports: Groundwater sampling occurs during four events per year. The latest sampling results are provided in the *RBAAP 2Q 2025 Groundwater Monitoring & Landfill Post-Closure Report* (Ahtna, 2025). The groundwater treatment plant monitoring takes place monthly and is reported quarterly (Ahtna, 2025).

2016 Five Year Review: The 2016 FYR was completed and finalized by the Army in July 2020 (U.S. Army Corps of Engineers (USACE), 2020). The FYR concluded that the remedies in place for the landfill and groundwater contamination are short-term protective and that the overall site is protective of human health and the environment. The Army committed to formalizing the institutional controls through the ESD #2.

2021 Five Year Review: The 2021 FYR was completed and finalized by the Army in March 2022 (USACE, 2022). The FYR concluded that the remedies in place for the landfill and groundwater contamination are short-term protective and that the overall site is protective of human health and the environment. The Army recommitted to continue formalizing the institutional controls through the ESD #2. The next FYR is due in September 2026.

Environmental Data Resources, Inc (EDR) Report: The records search for RBAAP, conducted by EDR in June 2006, searched for any potential environmental sites of concern located off Army property within corresponding ASTM search radius distances.

The EDR Report identified five sites located within one mile of the main plant and the E/P ponds. These sites were characterized as having a low potential to impact the property (EDR, 2006). The information presented in this report on adjacent properties remains accurate.

A new record search report was conducted by EDR in May 2013 (EDR, 2013) for the E/P ponds (Parcel 4) and in January 2014 (EDR, 2014) for Parcels A, 2, 2A, 1, and 1A. The results of these reports are consistent with the 2006 database search. An updated EDR search of environmental records for the Property and surrounding sites is not necessary. The May 2013 (Parcel 4) and January 2014 EDR (Main Plant) are current and accurate because the land use at the Property and surrounding areas has not materially changed, and no potential sites of concern were identified in the EDR search.

6.0 UPDATED ENVIRONMENTAL CONDITIONS

This section documents investigations and/or findings, and updates any information associated with the remaining RBAAP Parcels (A, 1, 1A, 2, 2A and 4) since the completion of the 2019 ECP Update Report.

6.1 Parcel 1 and 1A

PCB-Contaminated Soil Remediation Update

As discussed in the 2017 and 2019 ECP Update Reports, the presence of liquid PCBs in surface soils at Parcels 1 and 1A was confirmed through an investigation completed in 2013 (report finalized in 2015) (USACE, 2015). The remedial action goals for soil and sediment were established during a meeting between RBAAP personnel, USACE and Department of Toxic Substances Control (DTSC) in 2017. The remedial action goals established were 0.99 mg/kg (milligrams/kilogram) for soil and 0.22 mg/kg PCBs for sediments.

The soil and sediment removal action began in June 2015 and was completed in December 2017. To achieve the remedial goals, the soils were excavated as planned to approximately 0.5 feet below ground surface (bgs). Several areas (approximately 67-foot squares) were excavated to depths greater than planned. In 44 of 80 areas planned for 0.5 feet, the areas were excavated deeper based on confirmation sample results. Ten areas were planned for excavation to 1.5 feet of which five were excavated deeper based on confirmation sample results. Two areas were planned for excavation to 2.5 feet one of which was excavated to 3 feet based on confirmation sample results. During this effort 43,306.88 tons of non-hazardous soil and 12,296.68 tons of Toxic Substances Control Act (TSCA) soil was removed and disposed of at the appropriate landfills.

After the soil was excavated, the area was partially graded to prevent run-off and fenced. All confirmatory samples were below the established remedial actions goals in the confines of Parcels 1 and 1A. Four of the five grids covering the Oakdale Irrigation District (OID) Drainage Ditch north of Claribel Road and south of the fence line also yielded confirmation samples below the remedial action threshold. One of the grids (D-11) yielded a confirmation sample result of 0.45 mg/kg of Aroclor after excavation below 1.5 feet bgs.

Subsequent comments by the regulatory agencies noted that the result of 0.45 mg/kg exceeded the risk threshold for ecological receptors. In addition, agency comments noted that the Army neglected to acquire sidewall samples during confirmation sample collection. In review of the historic aerial photo record, the Army noted that there were three areas that were not excavated.

In response to these data gaps and in consideration of the impending North County Corridor (NCC) project the Army undertook a Focused Supplemental Remedial Investigation (RI) to acquire data from discrete retroactive sidewall samples and discrete samples for previously unexcavated areas. The Focused Supplemental RI was also initially planned to be conducted in the OID ditches north and south of Claribel Road using the Incremental Sampling Method. However, the conditions in the north ditch led to the conclusion that collecting samples at predesignated depth intervals was infeasible due to native material being encountered before the targeted depth intervals. Consequently, the north OID Ditch decision units were sampled instead at eight discrete locations per decision unit.

An Action Memorandum (AM) is in production and will document the work performed. The AM will serve as a decision document for cleanup of the area impacted by the North County Corridor project. The recommended removal action involves removal and offsite disposal of soil containing PCB concentrations in excess of the screening level threshold of 0.99 milligram per kilogram (mg/kg) of PCBs in soil. The Work Plan was finalized in November 2015 (RORE, 2015). Exposed soil is soil that is not covered by infrastructure or hardscape. In addition, in the area where PCBs have been detected above 15 mg/kg (construction worker risk threshold) the soil will be excavated, stockpiled and disposed of as a separate and segregated waste stream. This approach for the limited area identified for remediation is based on based on conversations held between the Army and the agencies as part of the development of the AM.

An RI/FS will incorporate the findings into cleanup recommendations for the areas that are not part of the NCC Project. Because the ESD #2 will select Land Use Controls for Parcels 1 and 1A, the Record of Decision (ROD) for Parcels 1 and 1A will select No Further Action (NFA). Until the ESD #2 is signed, this area will remain an ECP Category 5.

Groundwater Monitoring Update

Based on groundwater contours, the 2006 ECP identified an area of Parcel 1A that was impacted by groundwater contamination from IRP site RBAAP-03 on Parcel A. Due to this, and the proximity of the Landfill (IRP site RBAAP-01), monitoring wells were installed on Parcels 1 and 1A. There is a cluster of four Groundwater (GW) monitoring wells (MW) on the eastern portion of Parcel 1 (MW61A, MW61A', MW61B and MW61C). There is another cluster of three GW monitoring wells on the southeast portion of Parcel 1A (MW41A, MW41A', and MW41B). Monitoring wells within the cluster MW41 have not been sampled since May 2004. Results for these wells never exceeded ROD cleanup levels. Monitoring wells within the cluster MW61 were most recently sampled during Q3-2023, Q4-2023 and Q1-2024. MW61-A and A' have been dry during these periods. MW61-B and C yielded hexavalent chromium (Cr⁺⁶) results below the current action level of 10 µg/L. Results for these wells never exceeded ROD cleanup levels (Ahtna, 2020c). Even though, the GW monitoring wells on Parcel 1A

have not exceeded the ROD clean-up levels, MW145A' yielded dissolved chromium results above the ROD goal of 50 µg/L and also yielded Cr⁺⁶ results above the ROD goal of 10 µg/L consistently from 2019 through the most recent round of sampling results. .

MW145B also yielded Cr⁺⁶ results above the ROD goal of 10 µg/L during Q2-2020, Q2-2022 and Q4-2022.

MW145A' is on the parcel line between Parcel A and 1A (Ahtna, 2020c). See Figure 4 for the Q2-2025 data. The groundwater contours and recent data indicate that there is a likelihood of Cr⁺⁶ concentrations above the ROD action levels on the western portion of Parcel 1A.

Effective October 1, 2024, the State of California began regulating Hexavalent Chromium in groundwater at 10 micrograms per liter (µg/L). This had impacts on multiple wells across the RBAAP well network and the Army is monitoring all wells accordingly.

Conclusion for Parcels 1 and 1A

Parcel 1 will remain a Category 5 until the ESD #2 formally documents the clean-up actions and future land use controls. Parcel 1A will remain Category 5 until the groundwater treatment is complete or proves to be Operating Properly and Successfully.

6.2 Parcels 2 and 2A

Groundwater Monitoring Update

There are monitoring wells on these parcels related to IRP site RBAAP-03 and the remediation on Parcel A. One monitoring well cluster (MW66) with three groundwater monitoring wells remains on Parcel 2. The wells associated with that cluster are MW66A', MW66B and MW66C. Those wells are sampled annually. The most recent results for MW66B exceeded the 10 µg/L ROD goal for hexavalent chromium until Q2 2023. Therefore, the ECP Category for Parcel 2 has changed from Area Type 3 to Area Type 5.

There are two extraction wells (EW) located on Parcel 2A (EW72B and EW47C). The use of EW47C was discontinued prior to June 2004 due to sustained concentrations below ROD cleanup levels (Ahtna, 2019a). The Water Board approved of the plan to temporarily shut down EW72B to allow for a rebound study. All sample results have been below ROD cleanup levels for EW72B since 2014 (Ahtna, 2020c). The 2006 ECP report noted that the southern area of Parcel 2A will remain an ECP Category 5. The ECP Category may change to Category 4 if the selected groundwater remedy and treatment can be demonstrated to be Operating Successfully and Properly.

Conclusion

The groundwater under Parcels 2 and 2A is impacted by contamination and the groundwater remedy has not met the requirements for an Operating Properly and Successfully Determination. Therefore, both Parcels 2 and 2A are Area Type 5.

6.3 Parcel 4 (E/P Ponds)

Parcel 4 occupies 28.8 acres adjacent to the Stanislaus River and approximately 1.5 miles north of the main installation. The E/P Ponds were constructed in 1952 for the disposal of treated effluent generated at the IWTP (which has since been removed). The E/P Ponds were later used to dispose of water from the GWTP located on Parcel A serving the IRP Sites RBAAP-01: Landfill and RBAAP-03: Groundwater Contamination.

RBAAP continues to use the E/P Ponds for discharge of treated water. This discharge is regulated under Waste Discharge Requirements (WDRs) issued by the Central Valley Regional Water Quality Control Board. The WDRs require ongoing groundwater monitoring at the E/P Ponds. The influent and effluent are monitored monthly for the contaminants associated with the RBAAP groundwater treatment system extraction wells, total chromium and cyanide. The groundwater treatment plant was temporarily shut down to conduct the rebound study starting in April 2020. Extraction of groundwater and treatment of influent water was resumed in 2024. The extraction wells are sampled periodically.

Groundwater Monitoring Update

Due to historic chemicals of concern detected at the IRP sites on Parcel A (RBAAP-01 and RBAAP-03), there are five monitoring wells on Parcel 4 (MWP-1, MWP-2, MWP-3, MWP-4, and MWP-5). See Figure 3 for well locations and data. These wells are monitored quarterly for chromium, cyanide and other chemicals of concern (COCs). The Wells at the E/P ponds have historically yielded results for CoCs below action levels (Ahtna, 2020c). In May 2018, a request to modify the groundwater monitoring program (GMP) was submitted to the Water Board. This proposal requests sampling frequency reduction from quarterly to annually for the wells on Parcel 4 (Ahtna, 2019d).

Risk Assessment

As noted in the 2017 and 2019 ECP Update Report, the 1994 site wide ROD documented zinc contaminated soil. Based on RI findings, a removal action was required to address zinc contaminated soil in 1993. The 1994 site wide ROD documented removal action, and the ROD concluded that no further action was necessary at the ponds (USAEC, 1994). This site was also investigated for PCBs in the Galbestos investigation. None of the sediment samples in the E/P ponds contained PCBs exceeding the TSCA criteria (USACE, 2011a).

A Risk Screening evaluation was drafted, but not finalized, in December 2012. The purpose was to determine if the site constituents exceeded appropriate screening levels after the removal action and after PCB sampling described above. The constituents assessed during this action were metals, total petroleum hydrocarbons (TPH) and PCBs.

In February 2019, the Human Health Risk Assessment was finalized by reevaluating the data from the 2012 report, as well as addressing recent regulatory comments. During this evaluation, the maximum detected concentrations of the constituents were compared to the corresponding EPA November 2018 Residential Regional Screening Levels (RSL). The risk characterization of these sites concluded that the levels within the soil are within acceptable levels for residential receptors. The zinc found within the groundwater is within background levels and under the ecological screening level (USACE, 2019a and

2019b). The EPA has since stated that there is a presumed ecological risk because of high concentrations of zinc. A screening level ecological risk assessment (SLERA) is planned to begin in FY 2026. The results may affect the 1994 ROD NFA conclusion.

Conclusion

There are no other updates to Parcel 4. Due to the planned SLERA, this area is now an ECP Category 5.

6.4 Parcel A

This parcel will be transferred to the RLRA under an EDC. See below for all environmental updates related to Parcel A. Table 1 lists all ECP property area types and the updated ECP Categories.

6.4.1 Updates to Previously Identified Sites Discussed in Earlier ECP Updates

6.4.1.1 Updates to RBAAP-001-R-01, Former Pistol Range (ECP Study Section 12/Parcel A)

This area was reportedly used for small arms target practice in the 1950s. During the 2008 site investigation, the former pistol range was investigated for the presence or absence of small arms munitions and lead contamination in the soil and around the site. During this effort, a metal detector survey was completed, and soil samples were collected and analyzed for lead. The metal detector survey was negative for munitions, and the soil samples indicated that the levels of lead in the ground were below screening levels (USACE, 2008).

This area is adjacent to the stormwater ponds related to the stormwater conveyance system. This area is now part of the remediation efforts as described in Section 6.4.2.3 Parcel A – South of Building 6 PCB Contaminated Soil Activities and Stormwater Reservoir Conveyance System.

6.4.1.2 Updates to IRP Site RBAAP-01, Landfill

The landfill (inactive) is monitored in accordance with the Final Closure and Post-Closure Maintenance Plan (USACE, 1996). The landfill cover is visually inspected weekly to ensure the remedial action is effective and cleanup objectives are attained. The cover shows no sign of degradation, no sink holes, and no surface water drainage, which indicates that the cover continues to be effective.

On April 8, 2025, a semi-truck pulling a trailer created some rutting within the drainage swale between the landfill vegetative cover terminus and the access road. The inspection of the rutting indicates no damage to the GCL liner. Once the drainage swale is restored the remedy will continue to function as designed.

The monitoring wells continue to be analyzed for cyanide (Ahtna, 2020c). These sampling events take place during sampling events for IRP Site RBAAP-03: Groundwater Remediation. All levels of cyanide are below ROD cleanup levels [200 µg/L] (Ahtna, 2020c). Subsequent to the ROD, the cyanide levels were reduced to the State Maximum Contaminant Level (MCL) of 150 µg/L. The landfill remains an ECP

Category 4. The ESD # 2 formally documents the restriction of excavation of the landfill and groundwater usage as a remedy for the landfill. ESD # 2 is expected to be signed in 2nd Quarter FY 2026.

6.4.1.3 Updates to IRP Site RBAAP-03: Groundwater Remediation

Background

The IRP Site RBAAP-03 contains chromium and cyanide groundwater contamination possibly resulting from leakage associated with the original IWTP. The original IWTP at RBAAP was constructed to treat the wastewaters generated from the electroplating, cleaning, and metal finishing processes that were operated on-site. From 1973 to 1980, the IWTP was upgraded. The upgraded IWTP, identified as Solid Waste Management Unit (SWMU) 1, was operated under a Resource Conservation and Recovery Act (RCRA) Part B Permit 05-SAC-06, and has since been closed (Ahtna, 2012, Ahtna 2013a through 2013m, and DTSC, 2016).

In 1985, groundwater samples from six wells located west of the RBAAP yielded concentrations of chromium above the MCL of 50 µg/L. As a result, the Army installed an interim groundwater treatment system (GWTS) and provided bottled drinking water to those affected residents followed by the extension of the Riverbank city water system to all potentially affected residents at the time. The original IWTP redwood tank area was identified as the major source of chromium contamination. The EPA added the RBAAP to the National Priorities List (NPL) on February 21, 1990, primarily due to the presence of groundwater contamination (cyanide and chromium) detected on and off-post.

The groundwater contamination was addressed in the site-wide ROD (USAEC, 1994). In accordance with the ROD, the Army began operating the existing GWTP in 1996 to treat groundwater contaminated with chromium and cyanide. Groundwater contamination plumes are currently identified as areas of groundwater that exceed the MCL for either hexavalent chromium [10 micrograms per liter (µg/L)] or cyanide (150 µg/L). The treated groundwater is discharged to the E/P Ponds under discharge permit 5B50NC00012. Analytical data from groundwater samples collected since initiation of the remedial action show that, overall, the GWTS has been effective at capturing the groundwater contamination plumes and treating groundwater to below the cyanide MCLs. However, the results of the studies indicate the GWTS system was not effective at reducing chromium concentrations to below the MCL in certain small, localized areas. To reach the cleanup goal of 50 µg/L for dissolved chromium (at the time the regulatory threshold), a modified remedial approach using in situ treatment technologies was adopted and memorialized in ESD #1 (Army, 2013).

A Conceptual Site Model (CSM) for groundwater at the RBAAP site has been developed from 30 years of investigative and remediation data. According to the ROD, the two primary sources of groundwater contamination on-site are the landfill at the northeast end of RBAAP and potentially the former IWTP area in the east-central area of RBAAP. A secondary cyanide source area may lie between these two areas as well. Due to recent investigations and data analysis, the large, main production facility at the southern end of RBAAP was found to also be a potential chromium source area (USACE, 2014). Each of

these source areas has had remedial actions or remedial actions are in progress but may still provide a threat of continued groundwater degradation.

In-Situ Treatment Update

The Phase 1A of the in-situ treatment effort as described in the 2017 and 2019 ECP Update Report began August 2017. All completed actions were done in accordance with regulator approved plans. These actions included the installation of 15 injection wells in August/September 2017. All injection wells are located on Parcel A west of Building 13. This effort consisted of two rounds of chemical injections into the injection wells. The first round of injections was completed in late September 2017 and consisted of injecting approximately 10,000 gallons of high fructose corn syrup (HFCS) into the wells. The second round of injections was completed 30 days later, in late October 2017, and consisted of injecting approximately 10,000 gallons of Ferrous Iron Sulfate (FeSO_4) into the wells. The byproducts and other constituents from the injection wells have been analyzed and monitored quarterly starting in January 2018. Post-injection monitoring recommendations included to complete Phase 1B, which included reinjection into all in situ Phase I and IA injection wells in the A'-Zone and B-Zones and monitoring the A', B-, and C-Zone injection wells for dissolved, hexavalent, and total chromium. The objective of reinjection is to renew the Phase I reduction zones and provide additional treatment of dissolved chromium in the Building 13 and Landfill Areas groundwater. The Phase 1B reinjections took place in February 2020 in accordance with the work plan. Ahtna, 2019e). Results are being monitored. A Uniform Federal Policy – Quality Assurance Project Plan (UFP-QAPP) for a new phase of in-situ treatment was completed in 2025. The new phase will consist of the injection to be accomplished in a field rather than a linear configuration.

Updated Groundwater Monitoring Results

Groundwater monitoring consists of four sampling events per year. There are four reports: two quarterly, one semiannual and one annual which include specific sets of wells completed in the various A, A', B, C and D portions of the aquifer. The locations of the monitoring wells are shown in Figure 2. The results of the groundwater sampling from the 2nd quarter of 2025 are shown on Figures 4, 5 and 6 (Ahtna, 2025).

Based on the Q2-2025 groundwater report, eleven A'-Zone wells yielded concentrations exceeding the hexavalent chromium Action Level (10 $\mu\text{g/L}$) in the reporting period:

MW65A' (128 $\mu\text{g/L}$), EW69A' (91 $\mu\text{g/L}$), MW105A' (33.1 $\mu\text{g/L}$), MW110A' (99.1 $\mu\text{g/L}$), MW124A' (20.9 $\mu\text{g/L}$), MW125A' (902 $\mu\text{g/L}$), MW143A' (159 $\mu\text{g/L}$), MW144A' (249 $\mu\text{g/L}$), MW145A' (136 $\mu\text{g/L}$), MW149A' (209-218 $\mu\text{g/L}$), and MW152A' (33.7 $\mu\text{g/L}$). Data gaps remain in the characterization of the Building 13 Area hexavalent chromium plume boundaries in the A'-Zone (Figure 4).

- EW69A', MW145A', and MW149A' yielded groundwater samples with Action Level exceedances in the reporting period, and no A'-Zone wells south-southeast of these locations were sampled.
- MW152A' yielded groundwater samples with Action Level exceedances, and no wells are located downgradient (southwest) of this location.

Landfill Area dissolved chromium plume boundaries in the A'-Zone are identified in Figure 4.

Groundwater Monitoring Plan Information and Update

In 2016, Ahtna submitted an updated groundwater monitoring work plan that proposed to remove six annual sampling wells from the monitoring program, add eight annual sampling wells and add seven semiannual sampling wells to the program. In addition, the sampling frequency of ten wells was proposed to be reduced from quarterly to annual. Also, this plan proposed to abandon 48 monitoring wells. This work plan was approved by the Water Board (Ahtna, 2016; DTSC, 2017 and Ahtna, 2017a). Since the completion of the 2017 ECP Update Report, those actions were completed and implemented. During 2018 additional modifications were requested. These modifications included the shutdown of EW72A and offsite extraction wells, installation of new offsite extraction wells and changing the frequency of sampling for the monitoring wells on the E/P pond parcel. EW72A was shut down in December 2018. A work plan was submitted and approved by Water Board in January 2019 (Ahtna, 2018d). The installation of additional wells off-site was also approved. That work was completed in 2021.

Rebound Study

The groundwater treatment system and EW63A' was placed on standby mode (temporarily shut down) for at least eight quarters to complete a cyanide rebound study. The goal of the rebound study was to determine whether cyanide levels have stabilized at a concentration below the action levels. During this study, groundwater from EW63A' and several downgradient, cross-gradient, and upgradient monitoring wells were sampled and analyzed for cyanide, and additionally EW63A' was sampled for dissolved and hexavalent chromium. The rebound study did not change the frequency of sitewide groundwater sampling. The results indicated that, for the time being, the pump and treat system is still warranted as a remedial action for cyanide. A work plan was submitted and approved in February 2020 (Ahtna, 2020a).

The rebound study began in April 2020. Recent cyanide and chromium concentrations led the State regulators to require a system restart to mitigate ongoing off-site migration and return the system to previously negotiated levels in the ROD. The Army is currently upgrading treatment system components to return the groundwater system to full time operation and will continue sampling and coordination with the regulators with regard to treatment system efficiency.

Tracer Study

The bromide tracer study (AGL, 2021) began in September 2021, and the sixth tracer study sampling event was performed in 2Q24. Six off-base downgradient wells (MW151A', MW151B, MW152A', MW152B, MW153A', and MW153B) were added to the tracer study monitoring network ahead of the 2Q24 event to verify that the tracer had not migrated beyond the monitoring network without detection. Bromide was not detected at the MW150-series wells and not detected above site background levels at the IW130, IW132, or IW133-series wells. The continued tracer absence suggests groundwater velocities at the site may be slower than the historical values used to predict travel times for the *Groundwater Tracer Study Work Plan* (AGL, 2021).

6.4.1.4 Updates to SWMU 1 IWTP (ECP Study Section 13)

There are no updates to the SWMU 1 IWTP. This remains an ECP Category 5 due to its proximity to the groundwater contamination plume IRP Site RBAAP – 03 (Groundwater Contamination).

6.4.1.5 Updates to Building 11, Paint and Oil Storage (ECP Study Section 1011)

As discussed in the 2019 ECP report, this area was sampled for PCBs and TPH compounds. There was one area with the PCB concentrations above 1 mg/kg (7.4 mg/kg PCBs). The TPH sample results were less than the commercial/industrial worker risk levels. The recommendation for this area was to excavate soil that had PCB concentrations above 1 part per million (PPM) and not covered by hardscape. It was recommended to put a land use control on the areas that exceed 1 PPM but were under hardscape or near railroad tracks (Weston, 2018d). The UFP QAPP was approved in June 2020 (Weston, 2020). All actions were completed in accordance with the Time Critical Removal Action (TCRA) Action memo and associated work plan (Weston, 2018a and Weston, 2018b). The Final Completion Report Parcel A Soil/Sediment TCRA was completed in January 2022 (Weston, 2022) and this site will be incorporated into the Final ROD for Parcel A. This area is now ECP Category 5 due to its proximity to the groundwater contamination plume.

6.4.1.6 Updates to Structure 95, Substation No. 1 (ECP Study Section 1095)

This area was excluded from further sampling, as this area is an active outdoor electrical substation. The area is fenced, secured and marked. Previous soil sample results from 2008 had a maximum concentration of 0.26 mg/kg PCBs. These levels are below any action level. The area will remain secured and marked (Weston, 2018d). It is recommended to leave this area as an electrical outdoor substation. Formal documentation is pending regulator approval. Historical dielectric fluid samples indicate that this transformer is PCB contaminated (125 mg/kg PCBs). This area is now ECP Category 5 due to its proximity to the groundwater contamination plume.

6.4.1.7 Updates to Structure 97, Substation No. 3 (ECP Study Section 1097)

As part of the ESCA, this area underwent further PCB and TPH analysis to determine the extent of contamination. The maximum concentration for TPH as diesel was 6,600 mg/kg. The PCB concentrations in both the soil and concrete transformer pad were above 1 mg/kg PCBs. This transformer is inactive, and due to the PCB levels above 1 mg/kg PCBs, it was recommended that the remaining equipment be removed, as well as the contaminated soil and concrete pad (Weston, 2018d). The UFP-QAPP was approved in June 2020 (Weston, 2020). The removal action began in the summer of 2020. All actions were completed in accordance with the TCRA Action memo and associated work plan (Weston, 2018a and Weston, 2018b). The Final Completion Report Parcel A Soil/Sediment TCRA was completed in January 2022 (Weston, 2022) and this site will be incorporated into the Final ROD for Parcel A. This area is now ECP Category 5 due to its proximity to the groundwater contamination plume.

6.4.1.8 Updates to Structure 101, Substation spare (ECP Study Section 1101)

As part of the ESCA, this area underwent further PCB analysis to determine the extent of contamination. The transformers are no longer present. The concrete was sampled, and the analytical results for the concrete yielded a PCB concentration of 6.8 mg/kg. The soil concentrations ranged from 0.074 mg/kg to 1.9 mg/kg PCBs. Due to the fact that this area is no longer used and has elevated levels of PCBs, it was recommended that the pad and contaminated soil be removed. The work plan received approval in June 2020 (Weston, 2018d). The UFP-QAPP was approved in June 2020 (Weston, 2020). All actions were completed in accordance with the TCRA Action memo and associated work plan (Weston, 2018a and Weston, 2018b). The Final Completion Report Parcel A Soil/Sediment TCRA was completed in January 2022 (Weston, 2022) and this site will be incorporated into the Final ROD for Parcel A. This area is now ECP Category 5 due to its proximity to the groundwater contamination plume.

6.4.1.9 Updates to Structure 145, Substation 17 (ECP Study Section 1145)

This area is an active outdoor electrical substation. The area is fenced, secured, and marked. Previous soil sample results from 2008 yielded a maximum concentration of 9.5 mg/kg PCBs. Although these results are above Regional Screening Levels (RSLs), it is below the TSCA action levels. The area will remain secured and marked (Weston, 2018d).

During the site reconnaissance for the 2019 ECP effort, the transformers at substation 17 were found to be leaking (weapage). The leaking (weapage) was confirmed from the RLRA with report from an inspection of the transformers. Historical dielectric fluid samples indicate that one transformer within this substation is PCB contaminated, and the other two are non-PCB containing. The RLRA resampled in July 2024, and the western transformer contains 49 mg/kg PCBs. In response to the weapage, the RLRA sampled the transformer and the surrounding concrete. Additional remediation activities are under evaluation and will be incorporated into the Final ROD for Parcel A. This area is now ECP Category 5 due to its proximity to the groundwater contamination plume.

6.4.1.10 Updates to Building 162, Autodin A.B. Terminal Building (ECP Study Section 1162)

No updates. This area remains an ECP Category 5 due to its proximity to the groundwater contamination plume IRP Site RBAAP-03 (Groundwater Contamination).

6.4.1.11 Updates to Building 174, Hazardous Waste Storage Area (ECP Study Section 1174)

No updates. This area remains an ECP Category 5 due to its proximity to the groundwater contamination plume at IRP Site RBAAP-03 (Groundwater Contamination).

6.4.1.12 Updates to Substation 2 (ECP study section 1096)

During site reconnaissance for the 2019 ECP effort, an observation was made that

Substation 2 was possibly leaking (weepage). Since then, the dielectric fluid was sampled by the RLRA, and the results were 3.1 mg/kg PCBs. The leaking transformer, transformer pedestal and soil were removed. All actions were completed in accordance with the TCRA Action memo and associated work plan (Weston, 2018a and Weston, 2018b). The Final Completion Report Parcel A Soil/Sediment TCRA was completed in January 2022 (Weston, 2022) and this site will be incorporated into the Final ROD for Parcel A. The transformer was disposed of offsite. The remaining transformer within Substation 2 is currently operational. This area is now ECP Category 5 due to its proximity to the groundwater contamination plume.

6.4.2 Updates to PCB and Asbestos Containing Materials (ACM) Remediation Activities

Background

PCBs were detected in Galbestos® panels on Buildings 1-8, 11, 12, 15, 33-39, 43, 45-50, 80-83, 107, 133 and 160 and attached structures prior to the completion of the 2017 ECP Update Report. Galbestos® is a galvanized sheet metal siding with a layer of asbestos felt on one side which has been dipped in an asphaltic coating containing PCBs. Over the years, the Galbestos® siding weathered, allowing a non-liquid form of PCBs to be released. Sampling results detected a release of PCBs from the Galbestos® panels above TSCA criteria as well as EPA RSLs in several locations within and adjacent to buildings in the main plant area as well as the Northwest and Southeast Storm Water Reservoirs (USACE, 2013). Studies to locate the areas with Galbestos® Panels (Weston, 2010 and USACE, 2011b), and investigate the asbestos and PCB present in air and dust at the facility (USACE, 2010) were completed.

6.4.2.1 Building Interior Activities Update

An ESCA (ESCA 1) was executed to remove PCB and Galbestos® containing dust from equipment at Riverbank. During these activities, the PCB contaminated paint on the walls below eight feet was removed, as well as the PCB paint from the pits and trenches throughout the industrial area. Seven presses were retained and remediated in-place for future use. A best management plan is in development and currently awaiting regulator approval. While the approval of a Long-Term Management Plan is pending, the Army and LRA are using an extension of the short-term Management Plan to sample areas of concern. Activities are coordinated with the regulators to ensure that there will be no unacceptable exposure to PCB containing dust and chipping paint from surfaces.

Due to the dust from the Galbestos® panels, equipment from inside the building and other materials were characterized and disposed of off-site as appropriate. This report is pending final comments from EPA TSCA.

Currently under the ESCA, various sections of the concrete floors in select buildings that were found to be contaminated with PCBs required scabbling to clearance levels in half inch intervals, or should contamination be deeper in flooring, sections were removed. The scabbling and removal efforts are completed, and future monitoring will be included in the forthcoming ROD for Parcel A.

6.4.2.2 Galbestos Panel Removal Update

The Army and the RLRA executed a second ESCA (ESCA 2) to remove and dispose of the Galbestos® Panels from the buildings, as well as clean up any contamination inside the buildings, and investigate then remediate any soil contamination resulting from the deterioration of the Galbestos® outside the buildings (USACE, 2013). Galbestos® panels were removed and appropriately disposed of offsite during 2018. All actions are complete, the Army submitted the documentation in a Phase 1 report in 2020 and it is pending EPA approval.

As part of the first ESCA, the soil south of Building 6, which was contaminated with PCBs due to the Galbestos deterioration is addressed below. The outdoor, uncovered concrete spaces between the buildings, are referred to as the “courtyards.” In February 2019, a technical memo detailed all the sampling efforts that have taken place within the courtyard areas. It recommended that concrete with PCB results greater than 0.94 mg/kg PCBs be removed (Weston, 2019a). There are six areas that had PCB results above action levels, and they are located between Building 7 and 1, 2 and 3, and 4 and 5 need to have concrete removed. This work was integrated into the same work plan as other PCB remediation activities on site. The UFP - QAPP that includes this work was approved in June 2020 (Weston, 2020). It detailed that the areas that needed PCB removal actions would have concrete removed 10 feet by 20 feet, in half inch intervals until the action levels are achieved. The activities were complete in 2020 and are pending final documentation and will be incorporated into the Final ROD for Parcel A.

6.4.2.3 Parcel A – South of Building 6 - PCB Contaminated Soil Activities and Stormwater Reservoir Conveyance System

As part of preparation for the ESCA, sampling of soil in the industrial area at the south side of the plant near the railroad tracks took place and areas of soil contamination with liquid PCBs were discovered that may have been the result of dust suppression using spent oil containing PCBs during plant operations. This soil contamination was characterized and remediated as part of the ESCA 2 in 2018 as a TCRA. The actions for this area were completed as described by the TCRA Action Memo and Work Plan (Weston, 2018a and Weston, 2018b). During the remediation effort, the soil was excavated to approximately one to four feet bgs. All confirmatory samples were below the industrial action level of 0.95 mg/kg PCBs. As part of the same effort, the soil and sediment in the Northwest and Southeast storm water reservoirs were sampled for PCBs. The concentrations are above industrial action levels. The storm water conveyance system was flushed and cleaned. Soil and sediment removal and restoration with clean fill has been completed. All actions were completed in accordance with the TCRA Action memo and associated work plan (Weston, 2018a and Weston, 2018b). The Final Completion Report Parcel A Soil/Sediment TCRA was completed in January 2022 (Weston, 2022). This area will remain an ECP Category 5 until this site is incorporated into the Final ROD for Parcel A.

6.4.2.4 PCB Equipment Update

The list of PCB-containing and contaminated equipment is provided in Table 3. Since

the completion of 2017 ECP Update Report, various PCB equipment was removed and disposed of properly offsite. During the 2019 ECP Update, a full inventory of transformers and other electrical equipment was completed. Additional PCB sampling will take place in the future to confirm the presence or absence of PCBs within the equipment with missing information.

Transformers at Substation 2 (ECP Study Section 1096) and Substation 17 (ECP Study Section 1145) were found to be leaking (weepage) dielectric fluid. Previous sampling of the Substation 2 transformers dielectric fluid indicate that they are non-PCB contaminated. Further information on Substation 17 can be found in Section 6.4.1.9.

Further analysis is being conducted to determine which potheads are operational.

Potentially PCB impacted equipment was observed inside Building 8 within the Production Area. This equipment was used as reservoir tanks, which part of the heavy metal presses previously used by the Army (11 units). Each unit stored approximately 100 gallons of oil, which was potentially contaminated with PCBs. The oil has been removed, and the equipment was properly disposed of offsite.

Site transformers are operational and properly labeled in accordance with federal and state regulations. Operation and maintenance procedures are in place to address operational transformers as well as leaking transformers that are discovered during inspection activities.

6.4.2.5 Plastic Waste South of Building 6

Plastic waste was stockpiled on top of a concrete area south of Building 6. The initial sampling indicates that there are low levels of PCBs. The plastic waste was addressed under the waste characterization plan approved with conditions by EPA in late 2020 (Weston, 2020). The remedial action for this site was completed and data incorporated into the Final Completion Report Parcel A Soil/Sediment TCRA (Weston, 2022) and will be incorporated into the Final ROD for Parcel A.

6.4.2.6 Former Substation 15, Building 100

Soil samples collected in May 2020 indicated PCB contamination within soil surrounding Former Substation 15 (Building 100) located in the east courtyard between Buildings 1 and 2. Two soil samples were collected and the results were 22 and 23 mg/kg PCBs. The soil was further characterized and remediated. The concrete was scabbled and the soil removed to acceptable levels. The remedial action for this site was completed and data incorporated into the Final Completion Report Parcel A Soil/Sediment TCRA (Weston, 2022) and will be incorporated into the Final ROD for Parcel A. The remedial action for this site was completed and data incorporated into the Final Completion Report Parcel A Soil/Sediment TCRA (Weston, 2022) and will be incorporated into the Final ROD for Parcel A.

6.4.2.7 ACM Survey Update

An ACM survey was completed in 2018 and finalized in 2019 to assess the presence/absence and condition in structures and utilities for RBAAP. During this effort,

147 buildings were assessed. All of them are on Parcel A. Each building has a summary sheet within the final report that provides the condition and estimated quantity of each material tested. Examples of the types of materials found to be ACM are various thermal insulation, gaskets, floor tile mastic, floor tiles and various debris. The assessment confirmed the presence of friable and damaged ACM throughout various buildings (Ahtna, 2019b). An ACM re-inspection was completed in 2022 (Ahtna, 2022). See Appendix B for the table provided from the Asbestos Recertification Survey Report to see the summary of the buildings and ACM inventory.

6.4.2.8 Lead Based Paint (LBP) Survey Update

A LBP Survey was completed in 2018 and finalized in 2019 to identify the location, quantity and condition of the LBP in the buildings on RBAAP. During this effort, 147 buildings were assessed. All of them were on Parcel A. Each Building has a summary sheet within the final report that provides information on sample location, condition, sample results and estimated quantity. The assessment confirms that there is damaged LBP throughout buildings on RBAAP (Ahtna, 2019c). See Appendix C for a table from the final LBP report with a results summary for each building.

6.4.3 Preliminary Assessment/Site Inspection (PA/SI) Report

During the document review, it was noted that ten areas previously had minimal site investigations, and received no further action; however, they still needed proper a PA/SI to be completed in accordance with CERCLA. The PA/SI was completed in May 2018, by Weston Solutions under the ESCA. The areas that are included in the PA/SI are listed below:

- Area of Concern (AOC) 1 – Mortar Line Accumulation Area (Building 4) (ECP Study Section 38)
- AOC 2 – Machine Shop Accumulation Area (Building 9) (ECP Study Section 39)
- AOC 3 – Vehicle Maintenance Accumulation Area (Building 15) (ECP Study Sections 40 and 1015)
- AOC 4 – Grenade Casing Line Accumulation Area (ECP Study Section 41)
- RBAAP-07/AOC-7 – Phosphoric Acid Spill (Building 13, Second Floor) (ECP Study Sections 5, 7, 17, 44)
- AOC 15 – Temporary Wastewater Line (Building 13) (ECP Study Section 55)
- Solid Waste Management Unit (SWMU) 13 – Incinerator (former Building 123) (ECP Study Section 25)
- SWMU-14 – Incinerator (Building 163) (ECP Study Section 1163)
- SWMU 15 – Pesticide Storage Area (West of Building 11) (ECP Study Section 27)
- SWMU 16 – Pesticide Storage Area (Building 165) (ECP Study Section 28 and 1165)

The conclusion for the 10 sites listed above is No Further Action (Weston, 2018c). These areas are located on Parcel A, which will have restrictions pending the finalization of the ESD #2.

6.4.4 Other Analysis

As discussed in the 2019 ECP Update report, as part of the ESCA, the soil around the following buildings were sampled and analyzed for various constituents. The building, constituent and summary of results are listed below. The details can be found in the FOSET Data Gap Report (Weston, 2019b).

- Tool Crib/Warehouse/ Offices, Building 10 (ECP study section 1010) – TPH: The maximum result for TPH-diesel was 5.7 mg/kg, and the maximum result for TPH as motor oil was 38 mg/kg. All results were below commercial/industrial worker risk screening levels of 600 mg/kg (diesel) and 2,200 mg/kg (motor oil). No action is recommended for this area but will have a LUC for restriction on residential reuse, pending final documentation. This area remains an ECP Category 5.
- Boiler House, Building 12 (ECP study section 1012) – TPH and Metals: One sample for TPH as diesel exceed the screening criteria, and the averages do not exceed the screening levels. PCBs within this area are above 1 mg/kg PCBs (maximum is 5.2 mg/kg) in two locations (Sample locations B012S02 and B012S04). The average for metals within the soil does not exceed the risk-based screening levels. The recommendation was to excavate the area with PCB contamination above 1 mg/kg PCBs (near sample B012S02), and to place a land use restriction on the area near B012S04 due to the impracticability of excavating the contaminated soil. The UFP-QAPP was approved in June 2020 (Weston, 2020). The soil removal is complete but pending final documentation. This area remains classified as ECP Category 5. The remedial action for this site was completed and data incorporated into the Final Completion Report Parcel A Soil/Sediment TCRA (Weston, 2022) and will be incorporated into the Final ROD for Parcel A.
- Paint Spraying Facility, Building 169 (ECP study section 1169) – Volatile Organic Compounds (VOCs): Only benzene, toluene, ethylbenzene and xylene (BTEX) compounds were found in the results, and all results were well below screening levels. No actions are recommended. The ROD is pending. This area remains an ECP Category 5.

6.4.5 Wood Debris Pile

During the ECP site reconnaissance, a wood debris pile was located on the northwest corner of Parcel A, next to the train tracks. It is believed that this wood debris pile was composed of treated railroad ties. The railroad maintenance removed the ties and no further investigation is needed.

6.4.6 Perfluorinated Chemicals (PFCs):

Due to the historical metal plating operations in the main production facility on Parcel A, the Army completed a PA and SI. The SI sampled for PFC compounds in the groundwater and confirmed the presence of PFCs (Leidos, 2023). A RI is underway, and the UFP-QAPP was approved in June 2025 (Leidos, 2025). The potable water from the kitchen sink was sampled for PFCs. The results were non-detect (USPHC, 2017). This has no impact on the ECP Category designations.

6.5 Potable Water System

There were a total of six water supply wells on Parcel A. The Army abandoned wells I-02, I-03 and I-04. Wells I-05 and I-06 are now the primary water supply wells on the site. Well I-01 is held in reserve. As noted in Section 6.4.6, the potable water from the kitchen sink was sampled for PFCs. The results were non-detect (USPHC, 2017). In 2024 it was decided based on bacterial contamination concerns that the wells should not be used as a drinking water source. The use of groundwater will be restricted at RBAAP through ESD #2, except for the already permitted water production wells I-05 and I-06.

7.0 CONCLUSION

This ECP Update classifies the subject property into one of seven Department of Defense ECP categories as defined by ASTM D 5746-98 (2016, reapproved), *Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities*. Table 1 summarizes the ECP category by parcel, although all remaining Army owned parcels are planned for transfer under the FOSET. In addition, Table 2 provides further details of the environmental condition of individual sites, as detailed in prior ECP reports.

8.0 CERTIFICATION

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR §312.10 of 40 Code of Federal Regulations 312 and I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property.

The 2006 ECP Report, 2017, 2019, and 2024 ECP Update Reports were reviewed and found to meet the requirements set forth in §4.6.2 of ASTM D6008-22 and the narrative discussion and findings of that report are incorporated by reference into this ECP Report Update as if contained here in its entirety.

PAYTON.R.CURTIS.II. Digitally signed by
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R. Curtis Payton, II
BRAC Environmental Coordinator

9.0 BRAC APPROVAL

Jennifer Solomon
BRAC Program Manager
Office of the Deputy Assistant Secretary of the
Army (ODASA), Environment, Safety and
Occupational Health (ESOH)

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Weston, 2022. *Final Completion Report Parcel A Soil/Sediment Time Critical Removal Action,* January.

Tables

TABLE 1
Summary of Environmental Condition of the Property Findings

Parcel	Acres	ECP 2006	ECP 2019	ECP 2021	ECP 2026	Summary
A	77.67		6	6	5	<p>Historic activities at RBAAP resulted in the release of hazardous substances within the main manufacturing area, Parcel A, including PCBs in soils, and chromium and cyanide in groundwater. Investigations were also conducted for VOCs, SVOCs, metals, propane, TPH, and releases from Galbestos® panel siding.</p> <p>Much of the surface contamination has been completed but is pending regulatory or documentation approval.</p> <p>Several groundwater remedies are in place or underway but have not been determined to be Operating Properly and Successfully.</p>
1	8.46		5	5	5	<p>Releases of dielectric fluid on Parcel 1 resulted in surface soil contamination of PCBs. Most of the remedial action is completed and the remainder of the contamination will be addressed in a FY26 Time Critical Removal Action (TCRA).</p>
1A	4.37		5	5	5	<p>Releases of dielectric fluid on Parcel 1 resulted in surface soil contamination of PCBs. Most of the remedial action is completed and the remainder of the contamination will be addressed in a FY26 Time Critical Removal Action (TCRA).</p>
2	18.3		3	3	5	<p>Much of the study areas on Parcel 2 were documented in the 1994 ROD as No Further Action because contamination fell below regulatory drivers or were closed under the Resource Conservation and Recovery Act Permit or Consent Order which documented no Corrective Action was necessary.</p> <p>On October 1, 2025 the CA MCL for hexavalent chromium went into effect and the historic sampling data could no longer support a Area Type 3 designation.</p>

Table 1

Summary of Environmental Condition of the Property Findings (continued)

Parcel	Acres	ECP 2006	ECP 2019	ECP 2021	ECP 2026	Summary
2A	3.3	3	5	5	5	The chromium groundwater plume has migrated onto Parcel 2A. Several groundwater remedies are in place or underway but have not been determined to be Operating Properly and Successfully.
4	28.8	4	5	5	5	Parcel 4 is a non-contiguous parcel containing the Evaporation/Percolation Ponds (E/P Ponds). A removal action was completed prior to the 1994 ROD. In 2019, a Human Health Risk Assessment was finalized and found no unacceptable risk present for humans but no ecological risk assessment has been completed. Because additional remediation may be necessary once an ecological risk assessment is completed, the Property Area Type is updated to 5.

Environmental Condition of the Property Categories:

Category 1: Areas in which no release or disposal of hazardous substances or petroleum products has occurred, and to which there has been no migration of such substances from adjacent areas.

Category 2: Areas in which only release or disposal of petroleum products has occurred.

Category 3: Areas in which release, disposal, or migration of hazardous substances has occurred, but in concentrations that do not require a removal or other remedial response.

Category 4: Areas in which release, disposal, or migration of hazardous substances has occurred, but all removal or other remedial actions necessary to protect human health and the environment have been taken.

Category 5: Areas in which release, disposal, or migration of hazardous substances has occurred, and removal or other remedial actions are under way, but all required actions have not yet been taken.

Category 6: Areas in which release, disposal, or migration of hazardous substances has occurred, but required remedial actions have not yet been completed.

Category 7: Areas that have not been evaluated or require additional evaluation.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
Parcel 2							
42		AOC 5, Former Windrowed Area	3	3	3	Contamination in soil	No waste was stored in this area. NFA status concurrence received from DTSC in June 1996 (as detailed in the April 15, 1996, Revision 2 of the RFI Phase 1 Work Plan - CH2M HILL, 2002).
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
2004		North Utilities	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
4, 24		RBAAP-04/SWMU12, IWTP Effluent Sewer Line Break	3	3	3	Contamination in soils	1994 ROD documented NFA required. DTSC concurred with NFA status (October 30, 1995, version of the RFI Phase 1 Work Plan) and ROD.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
10, 34	42	Sanitary Wastewater Settling	3	3	3	Contamination in soil	Sampling completed in 1991. The site wide ROD (USAEC, 1994) documented NFA for this site. Based on concerns raised about potential

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
		Ponds/Sludge Beds (RBAAP-10/SWMU 22)					data gaps, the Army is evaluating additional investigation at this site.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1042	42	Building 42, Sewage Disposal Plant	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
2010		West Open Storage	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
2000		Open Land	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
2000		Open Land	3	1	1	No contamination	No known releases.
2001		North Railroad area	1	1	1	No contamination	No known releases.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
Parcel 2A							
Parcel 2A		Open Space	N/A	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
Parcel 2A		Open Space	N/A	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is above the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
Parcel 4 (E/P Ponds)							
35, 1129, 2024		Percolation/Evaporation Ponds (E/P Ponds) (RBAAP-11/ SWMU 23)	35 – 4 1129 – 3 2024 – 5	5	5	PCBs, Metals and TPH in soil	<p>The ROD documented zinc-contaminated soil. This removal action and concluded that no further action was necessary at the ponds (USAEC, 1994).</p> <p>This area continues to be used for discharge of treated water related to RBAAP-03 and is regulated under WDRs. The WDRs require ongoing groundwater monitoring at the E/P Ponds. See RBAAP-03 (ECP Study Section 3) for updates.</p> <p>This site was investigated for PCBs in the Galbestos investigation. None of the sediment samples in the E/P ponds contained PCBs exceeding the TSCA criteria (USACE, 2011).</p> <p>In 2019 a risk assessment was finalized to document that there is no risk to human health, but the regulatory agencies have raised</p>

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							additional concerns. A screening level ecological risk assessment is planned for FY26.
Parcel 1							
49		AOC 10, Former Solid Waste Pile (Southeast Corner)	1	5	5	PCBs in soil	Investigations determined PCB contamination was present in the soil in this area. PCB soil remediation actions are completed. Awaiting final documentation.
2012		South Open Storage	1	5	5	PCBs in soil	Investigations determined PCB contamination was present in the soil. PCB soil remediation actions are completed. Awaiting final documentation.
2003		South Parking (Remainder of Parcel 1)	1	5	5	PCBs in soil	Investigations determined PCB contamination was present in the soil. PCB soil remediation actions are completed. Awaiting final documentation.
Parcel 1A							
2003		South Parking	1	5	5	PCBs in soil	Investigations determined PCB contamination was present in the soil. PCB soil remediation actions are completed. Awaiting final documentation.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
2003		South Parking (remainder of Parcel 1A)	1	5	5	PCBs in soil	Investigations determined PCB contamination was present in the soil. PCB soil remediation actions are completed. Awaiting final documentation.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume. Data from the 3rd Quarter 2020 and subsequent sampling indicate that the groundwater on the northeast corner of this parcel is above the ROD action levels. The groundwater contours indicate that groundwater within this parcel is above ROD action levels.
Parcel A							
N/A	NW of Railroad	Wood Debris Pile (Northwest corner of railroad tracks)	N/A	7	1	Contamination in soil	During the site reconnaissance, a debris pile was observed. The debris appears to be treated railroad ties. Railroad ties were removed from the site.
1106, 1181, 2016		PCB Contamination Area south of Building 6	3	6	5	PCBs in soils	Due to deteriorated Galbestos panels, the soils to the area south of Building 6 was found to have elevated PCBs within the soil. A TCRA was completed and approved in 2018. The removal actions were completed in 2017.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
N/A		Plastic Waste South of Building 6	N/A	N/A	5	PCB in waste	A large stockpile of plastic waste has been stored south of Building 6 on a concrete slab. The plastic was characterized and properly disposed of in 2023. Sampling of the concrete below the waste indicated the risk are below RSLs. This area will be closed out in the planned Parcel A ROD.
1, 22, 23	Landfill	RBAAP-01, Landfill SWMU 10, Landfill (Southern Portion) SWMU 11, Landfill (Northern Portion)	5	4	5	Cyanide and chromium groundwater contamination	The landfill was investigated during the RI/FS (completed in 1993). The RI concluded that it was a major source of cyanide and a minor source of chromium contamination to the groundwater. The landfill underwent formal closure in 1996 and received formal "Construction Complete" certification on October 30, 1995. There are land use controls in place to maintain the cap and conduct groundwater monitoring as required by the 1994 site-wide ROD. Groundwater continues to be monitored. All cyanide results are below ROD levels but lowered hexavalent chromium levels and some total chromium levels are above MCLs in the northern portion of the landfill at MW-65 and 124 A'.
2, 30, 1161	161	RBAAP-02, Waste Salt Disposal Pit (Located near Building 161)	3	3	3	Contamination in soil Chromium groundwater contamination from IRP Site RBAAP-03	NFA determination documented in 1994 Site Wide ROD. This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							See RBAAP-03 (ECP Study Section 3) for updates.
3		RBAAP-03, Groundwater Contamination	5	5	5	Chromium groundwater contamination	<p>ROD signed in 1994 developed the remedial goals for this groundwater contamination.</p> <p>This remains a Category 5 due to the ongoing pump and treat system, and as well the in-situ injections. Groundwater monitoring wells have been abandoned in accordance with the approved groundwater plan from 2017. The rebound study began in April 2020. The tracer study began in 2021 and continues along with groundwater monitoring. Additional in-situ treatment activities are underway.</p>
5, 7, 17, 44	13	RBAAP-05 - Building 13, Chromium Pretreatment	3	5	5	Contaminants in soil	<p>RBAAP-05: NFA status documented in site wide ROD.</p> <p>RBAAP-07/AOC-7: NFA status documented in letter from DTSC dated June 5, 1996, and is detailed in the April 15, 1996, Revision 2 of the RFI phase I Work Plan. PA/SI completed for this area in May 2018. No further action.</p>
		Chromium groundwater contamination from IRP Site RBAAP-03				ECP Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).	

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
6, 43		RBAAP-06, IWTP H ₂ SO ₄ Spill	7	5	5	Sulfuric Acid in soil	This spill was given NFA Status based on investigative results. Documented in closure certifications. The locations within SWMU 1 boundary. The required remediation actions at SWMU 1 (IWTP) were completed in 2015.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going but levels in the area are no longer above the MCL. See RBAAP-03 for updates.
8, 33, 1135	135	RBAAP-08/ SWMU 21 Southeast Storm Reservoir and Storm drain basin	4	6	5	Chromium and cyanide in soils	NFA status of chromium and cyanide in soils documented in 1994 Site Wide ROD.
						PCBs in soils	This area collects storm water runoff from the facility. After soils and storm water conveyance system was cleaned, this area was sampled and remediated as necessary and in accordance with the TCRA. Pending final documentation.
56	135	AOC 16, Substation 5	4	4	4	PCBs in soil	Soil contaminated with PCBs (Arochlor-1260) at concentrations greater than IPRGs has been successfully removed from the gravel and soil areas surrounding Substation 5 and the storm water discharge basin. Confirmation samples collected in 2003 from the excavation were non-detect. Excavated soils were disposed of properly. A ROD to properly document these actions and decisions will be completed.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
9, 32	127	RBAAP-09, Northwest Storm Reservoir/ SWMU 20, Northwest Storm Reservoir	3	6	5	Chromium and cyanide in soils	NFA documented in 1994 Site Wide ROD.
						PCBs in soils	This area collects storm water runoff from the facility. After soils and storm water conveyance system is cleaned, the area was remediated under a TCRA and impacted soils removed.
12		RBAAP-001-R-01, Former Pistol Range	7	6	4	Metals in soil	NFA based on the results of the 2008 SI changed to Category 1. The area was remediated under a TCRA and impacted soils removed.
						PCBs in soils	This area is adjacent to the storm water reservoir ponds which collected runoff from the facility. After soils and storm water conveyance system was cleaned, this area was sampled and remediated as necessary and in accordance with the TCRA.
13, 16, 19, 20, 31, 1043, 1044, 1173	IWTP Area	SWMU 1, Industrial Wastewater Treatment Plant (IWTP)	7	5	5	RCRA Permit Closure	Originally, Category 7 based on location within SWMU 1 boundary. The required remediation actions at SWMU 1 (IWTP) were completed in 2015/2016. Closure granted from DTSC in August 2016. See closure reports.
		SWMU 4 SWMU 7				Galbestos Panels	Building 43 was identified to have Galbestos panels. The panels have been removed.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
		SWMU 8 SWMU 19				Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded Chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
14, 1174	174	SWMU 2, Hazardous Waste Storage Area (Drum Storage Facility)	5	5	5	RCRA Permit Closure	Site is the subject of the Closure Certification Report Hazardous Waste Management Unit #3 Chromium Reduction Unit – Batch Process RCRA Hazardous Waste Facility Permit Closure, RBAAP, 2013. Required actions completed in 2015/2016. DTSC granted closure in August 2016.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going but are no longer above the MCL. See RBAAP-03 for updates.
15	20	SWMU 3, Empty Drum Storage Area (Railroad Car Off-Loading Area)	5	5	5	VOCs and metals in soil	Investigated during RI as potential source area. Soil and soil gas samples collected. No metals above background in soil samples. Soil gas results area unlikely source of VOC contamination. NFA documented in 1994 site wide ROD.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past but are no longer above the MCL. Groundwater remediation is on-going. See RBAAP-03 for updates.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
18, 1180	1	SWMU 6, Chromium Reduction Unit (Building 1)	5	5	5	RCRA permit closure	Site closed under RCRA permit. See closure reports. NFA.
						Galbestos Panels	Building 1 was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
21, 1177	177	SWMU 9, Equipment Wash Facility (Building 177 Triple Rinse Area)	5	5	5	RCRA permit closure	Site closed under RCRA permit. See closure reports. NFA.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
25	123	SWMU 13, Incinerator (Building 123)	5	5	5	Contamination in soils	No reported releases. PA/SI completed for this area in May 2018. NFA.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
26, 1163	163	SWMU 14, Incinerator	5	5	5	Contamination in soils	No reported releases. PA/SI completed for this area in May 2018. NFA.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
		(Building 163)/ Incinerator				Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
27	11	SWMU 15, Pesticide Storage Area (West of Building 11)	5	5	5	Pesticides in soils	PA/SI completed for this area in May 2018. NFA.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
28, 1165	165	SWMU 16, Pesticide Storage Area (Building 165)	5	5	5	Pesticides in soils	Samples previously collected indicate that no contamination was detected above residential levels. PA/SI completed for this area in May 2018. NFA.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
29, 1170	170	SWMU 17, Pesticide Storage Area (Building 170)	5	5	5	Pesticides in soils	Concrete sump removed and chlordane contaminated soil remediated in 1994 with Stanislaus County Environmental Resources Department oversight. A ROD to properly document these actions and decisions will be completed.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
36	N/A	SWMU 24, Industrial Waste Pipe Leak	4	5	5	Contamination in soils	Soil excavated to repair the IWPT pipe leak was disposed of offsite. Site investigated as part of the 1991 RI; no contamination detected. Documented in Site Wide 1994 NFA ROD.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
37	1, 2, 3, 4, 5, 6, 7, 12, 15, 77, 137, 170	SWMU 25, Former Underground Storage Tanks 1, 6, 11A, 12, 12A, 12B, 15A, 15B, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37, T77, T137	1, 6 – 7	3	4	UST abandonment	Tanks 11A, 24, 25, 26, 27, 28, 29, 30, 31, and 32 were removed or closed in-place. NFA status based on closures.
			1, 7, 12, 15, 77, 170 - 5			Galbestos Panels	Buildings 1, 2, 3, 4, 5, 6, 7, 12 and 15 was identified to have Galbestos panels. The panels have been removed.
			2, 3, 4, 5, 6 - 3			Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
			137 - 2				

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
38	4	AOC 1, Mortar Line Accumulation Area (Building 4)	3	5	5	Contamination in soil	After closure of unit, the concrete pad that it was on was in good condition. No sampling required. PA/SI completed for this area in May 2018. NFA.
						Galbestos Panels	Building 4 was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
39	9	AOC 2, Machine Shop Accumulation Area (Building 9)	5	5	5	Contamination in soil	After closure of unit, the concrete pad that it was on was in good condition. No sampling required. PA/SI completed for this area in May 2018. NFA.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
40, 1015	15	AOC 3, Vehicle Maintenance Accumulation Area (Building 15)	5	5	5	Contamination in soil	After closure of unit, the concrete pad that it was on was in good condition. No sampling required. PA/SI completed for this area in May 2018. NFA.
						Galbestos Panels	Building 15 was identified to have Galbestos panels. The panels have been removed.

Table 2

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						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
41	N/A	AOC 4, Grenade Line Accumulation Area	5	5	5	Contamination in soil	After closure of unit, the concrete pad that it was on was in good condition. No sampling required. PA/SI completed for this area in May 2018. NFA.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
45	75	AOC 8A, Horizontal Aboveground Storage Tanks - Propane Storage Tanks	5	5	5	Propane in soils	ASTs were not used for waste. Only propane was stored within the tanks. No further action required.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
46	85	AOC 8B, Horizontal Aboveground Storage Tanks - Transformer Oil	5	5	5	PCBs in soil	ASTs were cleaned and removed. The lines were drained, cleaned and capped (filled with a cement slurry). Known releases. A ROD to properly document these actions and decisions will be completed.

Table 2

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
		Storage Tanks (including the Transformer Oil Distribution System)				Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
47, 1076	76	AOC 9A, Vertical Aboveground Storage Tanks – Fuel Oil Storage Tanks	3	3	3	AST Removal	ASTs were removed. Prior to removal, the tanks were cleaned and visually inspected. The tanks showed no signs on leaks. NFA status based on investigation results.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
48, 1139	139	AOC 9B, Vertical Aboveground Storage Tanks - Fire Sprinkler Storage Tank	1	1	1	No releases	No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the area of groundwater contamination.
50, 1126, 1127	125, 126	AOC 11A, Loading Racks – Propane Farm Loading/Unloading	50, 1126 – 5 1127 - 3	5	5	Propane in soil	NFA because the physical characteristics of propane would cause it to vaporize if there were a release. There is no potential for soil or groundwater to be contaminated.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
51, 1137	137	AOC 11B, Loading Racks – Fire Sprinkler Pumping Station	2	2	2	POL in soil	Category 2 based on small lens of petroleum contaminated soil remaining beneath Building 137, associated with UST T137.
52	Prod. Area and IWTP	AOC 12, Industrial Wastewater Collection System	3	3	3	Contamination in soil	Soil investigations involving collection of soil samples from within and adjacent to the sumps and trenches associated with production lines 2, 3, 4 and 5 were completed in accordance with DTSC-approved work plans. Soil samples were collected from both the production line trenches and sumps. The investigations did not identify contaminants at elevated concentrations in the soil samples. A ROD to properly document these actions is in production.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
53, 1178	178	AOC 13, Draw Lube System (Building 178)	5	5	5	POL in soils	In March 1993, during layaway activities in Building 13, contamination was discovered on the south side of Building 178. Thirteen soil samples were collected and elevated oil and grease concentrations were detected at two locations. Soil excavation took place to remove the contamination, an area 6-feet wide by 16-feet long was excavated immediately adjacent to Building 178. A ROD to properly document these actions and decisions is in development.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded Chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
54	Prod. Area and IWTP	AOC 14, Zinc-Cyanide Wastewater Collection System	3	3	3	Cyanide in soils	Soil samples previously collected below and near sump 6-11 at depths of 11 to 13 feet did not identify elevated cyanide contaminant concentrations. The soil investigation completed for the portions of the cyanide wastewater collection system near production lines 2 through 5 did not identify any significant elevated concentrations. A ROD to properly document these actions and decisions is in development.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
55	13	AOC 15, Building 13 Temporary Wastewater Line	3	5	5	Temporary wastewater line	The temporary wastewater line was removed from Building 13 and is capped outside the building. There is no documentation of any spills or releases associated with this unit. PA/SI completed for this area in May 2018. NFA.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1001	1	Production Line	7	7	5	PCBs in soils	An ESCA was executed to investigate and remove PCBs and Galbestos in the main production buildings located in Parcel A. Remedial actions will be delineated in the forthcoming ROD for Parcel A.
						Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates
1002	2	Production Line	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1003	3	Central and Eastern portion of Production Line 3 Sumps: 3-1, 3-2, 3-3, 3-6, 3-7,	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
		3-8, 3-9, 3-10, 3-11					See RBAAP-03 (ECP Study Section 3) for updates.
1003	3	Western portion of Production Line 3	3	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Sumps: 3-1, 3-2, 3-3, 3-6, 3-7, 3-8, 3-9, 3-10, 3-11				Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the western area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1004	4	Central and Eastern portion of Production Line 4	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Sumps: 4-1, 4-2, 4-3, 4-4, 4-5, 4-6, 4-7, 4-8, 4-9, 4-10, 4-11				Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1004	4	Western Portion of Production Line 4	3	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Sumps: 4-1, 4-2, 4-3, 4-4, 4-5, 4-6, 4-7, 4-8, 4-9, 4-10, 4-11				Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the western area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1005	5	Central and Eastern portion of Production Line 5	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Sumps: 5-1, 5-2, 5-3, 5-5, 5-6, 5-8, 5-10, 5-11				Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1005	5	Western portion of Production Line 5	3	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Sumps: 5-1, 5-2, 5-3, 5-5, 5-6, 5-8, 5-10, 5-11				Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the western area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1006	6	Production Line	7	7	5	PCBs in soil	An ESCA was executed to investigate and remove PCBs and Galbestos in the main production buildings located in Parcel A. Remedial actions will be delineated in the forthcoming ROD for Parcel A.
						Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Groundwater contamination within the western area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See

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Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							updates related to RBAAP-03 (ECP study Section 3).
1006	6	Building 6: Zinc Plater Cyanide Sump	7	7	5	PCBs in soil	An ESCA was executed to investigate and remove PCBs and Galbestos in the main production buildings located in Parcel A. Remedial actions will be delineated in the forthcoming ROD for Parcel A.
						Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Groundwater contamination within the western area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1007	7	Building 7: Production Line	5	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1008	8	Building 8: Production Line – Press Room	7	7	5	PCBs in soil	An ESCA was executed to investigate and remove PCBs and Galbestos in the main production buildings located in Parcel A. Remedial actions will be delineated in the forthcoming ROD for Parcel A.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
		Production Line Sump 4500 Ton Press Pit (Building 8)				Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1009	9	Building 9 - 05Machine Shop/Offices	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1010	10	Crib/Warehouse /Offices, Former National Guard	5	5	5	TPH in soil	Samples were collected in 2018 (FOSET Data gap Report). The maximum result for TPH-diesel was 5.7 mg/kg, and the maximum result for TPH as motor oil was 38 mg/kg. All results were below commercial/industrial worker risk screening levels of 600 mg/kg (diesel) and 2,200 mg/kg (motor oil). No action is recommended for this area. Documentation is pending.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1011	11	Paint and Oil Storage, Oil Recycling and Transport See EBS 1998 (Building 11)	7	6	5	PCBs and TPH in soils	<p>Was originally Category 7 based on soil samples that identified Aroclor-1260 at concentrations ranging from 0.4 mg/kg to 1 mg/kg (above the Industrial PRG of 0.74 mg/kg).</p> <p>Samples were completed in 2018 (FOSET Data gap). There was one area with the PCB concentrations above 1 mg/kg (7.4 mg/kg PCBs). The TPH sample results were less than the commercial/industrial worker risk levels. The recommendation for this area is to excavate soil that has PCB concentrations above 1 mg/kg that is not covered by hardscape. It is recommended to put a land use control on the areas that exceed 1 mg/kg but are currently under hardscape or near railroad tracks. The Uniform Federal Policy QAPP was approved in June 2020 (Weston, 2020). Removal action completed in 2020, and pending final documentation.</p>
						Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1012	12	Boiler House	7	6	5	TPH, Metals and PCBs in soil	Was previously Category 7 based on soil samples that identified chromium in one sample at a concentration of 144 mg/kg (above the industrial PRG of 64 mg/kg).

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							<p>Samples were collected in 2018 (FOSET Data gap Report). One sample for TPH as diesel exceed the screening criteria, and the averages do not exceed the screening levels. PCBs within this area are above 1 mg/kg PCBs (maximum is 5.2 mg/kg) in two locations (Sample locations B012S02 and B012S04). The average for metals within the soil does not exceed the risk-based screening levels. The recommendation is to excavate the area with PCB contamination above 1 mg/kg PCBs (near sample B012S02), and to place a land use restriction on the area near B012S04 due to the impracticability of excavating the contaminated soil. The Uniform Federal Policy QAPP was approved in June 2020 (Weston, 2020). Removal action completed in 2020, and pending final documentation.</p>
						Galbestos Panels	<p>This building was identified to have Galbestos panels. The panels have been removed.</p>
						Chromium groundwater contamination from IRP Site RBAAP-03	<p>This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.</p>
1013	13	Production Line	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	<p>Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).</p>

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1014	14	Dispensary/ Locker Rooms, Security Office	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1016	16	Offices and Gate House	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1017	17	Administrative Offices	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1018	18	Cafeteria and Offices	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1019	19	Production Restrooms	3	3	4	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1021	21	Plant Cafeteria	3	3	4	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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1022	22	Aisleway and Office (within Bldg. 160)	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1022	22A	Training Room (within Bldg. 160) (between Building 1 and 2)	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	2 and 3	Courtyard between Buildings 2 and 3	N/A	3	5	PCB contamination in concrete	In February 2019, a technical memo detailed all the sampling efforts that have taken place within the courtyard areas. It recommended that concrete with PCB results greater than 0.94 mg/kg PCBs be removed (Weston, 2019). There are six areas that had PCB results above action levels, and they are located between Building 7 and 1, and 1 and 2 need to have concrete removed. This work was integrated into the same work plan as other PCB remediation activities on site. The Uniform Federal Policy QAPP that includes this work was approved in June 2020 (Weston, 2020). It detailed that the areas that needed PCB removal actions would have concrete removed 10 feet by 20 feet, in half inch intervals until the action levels are achieved. The activities were

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							completed in 2020 and are pending final documentation.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1023	23	Aisle way and Office (between Building 3 and 4)	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates
1024	24	Aisleway and Gage Laboratory (between Building 4 and 5)	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	4 and 5	Courtyard between Buildings 4 and 5	N/A	N/A	5	PCB contamination in concrete	In February 2019, a technical memo detailed all the sampling efforts that have taken place within the courtyard areas. It recommended that concrete with PCB results greater than 0.94 mg/kg PCBs be removed (Weston, 2019). The are six areas that had PCB results above action levels, and they are located between Building 7 and 1, 2 and 3 and 4 and 5 need to

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							have concrete removed. This work was integrated into the same work plan as other PCB remediation activities on site. The Uniform Federal Policy QAPP that includes this work was approved in June 2020 (Weston, 2020). It detailed that the areas that needed PCB removal actions would have concrete removed 10 feet by 20 feet, in half inch intervals until the action levels are achieved. The activities were completed in 2020 and are pending final documentation.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1025	25	Aisleway and Acctg Storage Area (between Building 5 and 6)	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1026	26	Aisleway and Instrument Storage Area (South of Building 6)	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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1027	27	Restroom and Passage	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1028	28	Restroom and Passage	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1029	29	Restroom	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1030	30	Restroom and Passage	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1031	31	Restroom and Passage	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1032	32	Restroom and Passage	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1033	33	Passage and Distribution PNL – S.S. No. 1 (West passage between Building 7 and 1)	5	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates
1034	34	Passage and Office (West passage between Buildings 1 and 2)	5	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1035	35	Passage and Emerg. Gen No. 7 (West passage between Buildings 2 and 3)	3	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	ECP Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1036	36	Passage (West passage between Buildings 3 and 4)	3	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3)
1037	37	Passage and Office (West passage between Buildings 5 and 6)	3	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1038	38	Passage (West passage between Buildings 6 and 7)	3	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1039	39	Central Salvage Area	3	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.

Table 2

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1045	45	Production Line	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1046	46	Production Line	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1047	47	Production Line and Emerg. Gen No. 2 (Generator Removed)	3	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 based on groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation is on-going. See RBAAP-03 (ECP Study Section 3) for updates.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1048	48	Production Line and Office	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1049	49	Production Line and Emerg. Gen No. 4 and 5	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1050	50	Production Line and Emerg. Gen No. 6	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1051	51	Laboratory, Chemical and Metallurgical	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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1052	52	Transformer Area – Substation No. 10	3	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
56, 1053	53	AOC-16; Transformer Area – Substation No. 5	4	4	4	PCBs in soil	Soil contaminated with PCBs (Arochlor-1260) at concentrations greater than IPRGs has been successfully removed from the gravel and soil areas surrounding Substation 5 and the storm water discharge basin. Confirmation samples collected in 2003 from the excavation were non-detect. Excavated soils were disposed of properly. The final RFI recommended NFA for AOC 16b (CH2M HILL 2005a). DTSC concurred by approving the Final RFI Report. ROD to properly capture PCB remediation to be completed. The transformers have been removed from Substation 5.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1054	54	Transformer Area – Substation No. 13	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1055	55	Transformer Area –	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
		Substation No. 9					See RBAAP-03 (ECP Study Section 3) for updates.
1056	56	Transformer Area – Substation No. 7	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1057	57	Transformer Area – Substation No. 12	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1058	58	Transformer Area – Substation No. 8	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1059	59	Transformer Area – Substation No. 6	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1060	60	Transformer Area – Substation No. 11	3	3	4	Galbestos Panels	The building where this substation is located was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							See RBAAP-03 (ECP Study Section 3) for updates.
1061	61	Cooling Tower Control House	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1062	62	Facilities Eng. Store House	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1064	64	Fuel Oil Unloading Serv. Bldg.	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded Chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1073	73	Hose Cart House No. 1, Storage	7	5	5	Contaminants in soil	This area is within the boundary of SWMU 1 (IWTP). The required remediation actions at SWMU 1 were completed in 2015/2016.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded Chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1074	74	Compressor House, Propane Storage. Area	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							See RBAAP-03 (ECP Study Section 3) for updates.
1075	75	Propane Storage Area	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1077	77	Sulfuric Acid and Caustic Soda Storage	7	5	5	Contaminants in soil	This area is within the boundary of SWMU1. The required remediation actions at SWMU 1 (IWTP) were completed in 2015/2016.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1078	78	Oil Room Building	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1080	80	Varnish Stripping Building	3	3	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1081	81	Production Line	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1082	82	Tocco Generator and Emergency. Generator No. 9	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1083	83	Plating Rack Repair Area	3	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1084	84	Loading Dock with Canopy	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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1085	85	Transformer Oil Pump Building	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1087	87	Storage Building	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1095	95	Transformer Area – Substation No. 1	7	6	5	PCBs in soil	This area was excluded from further sampling, as this area is an active outdoor electrical substation. The area is fenced, secured and marked. Previous soil sample results from 2008 had a maximum concentration of 0.26 mg/kg PCBs. These levels are below any action level. The area will remain secured and marked (Weston, 2018d). The recommendation is to leave this area as an electrical substation and maintain the area as such. This recommendation is pending regulatory concurrence.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1096	96	Transformer Area – Substation No. 2	3	7	5	PCBs in soil	During the site reconnaissance, western transformer was within this Substation was found to be leaking (weapage). The PCB concentration of the leaking transformer was 3.6 mg/kg PCBs. The transformer was taken

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							offline and the area remediated. Remedial actions will be delineated in the forthcoming ROD for Parcel A.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates
1097	97	Transformer Area – Substation No. 3	7	6	5	TPH and PCBs in soil	Category 6 based on potential for PCBs to have impacted the soil adjacent from two transformers (PCB concentrations of 64 mg/kg and 33 mg/kg). As part of the FOSET Data gap report effort, this area underwent further PCB and TPH analysis to determine the extent of contamination. The maximum concentration for TPH as diesel was 6,600 mg/kg. The PCB concentrations in both the soil and concrete transformer pad were above 1 mg/kg PCBs. This transformer is inactive, and due to the PCB levels above 1 mg/kg PCBs, it was recommended that the remaining equipment be removed, as well as the contaminated soil and concrete pad (Weston, 2018d). The Uniform Federal Policy QAPP was approved in June 2020 (Weston, 2020). Removal action completed in 2020 and is pending final documentation in the Parcel A ROD.
						Chromium groundwater contamination from IRP Site RBAAP-03	The groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates

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1098	98	Transformer Area – Substation No. 4	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1099	99	Transformer Area – Substation No. 14	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1100	100	Transformer Area – Substation No. 15	3	3	5	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
						PCBs in soil	PCB contaminated soil was discovered in a May 2020 sampling event. Concrete and soil remediation was completed in 2024, and further action will be included in the Parcel A ROD.

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1101	101	Transformer Area – Substation Spare	7	6	5	PCBs in soil	In 2018 as part of the FOSET Data gap effort, this area underwent further PCB analysis to determine the extent of PCB contamination. The transformers are no longer present. The concrete was sampled, and the results for PCBs were 6.8 mg/kg. The soil concentrations ranged from 0.074 mg/kg to 1.9 mg/kg PCBs. Because this area is no longer used and has elevated levels of PCBs, it is recommended that the pad and contaminated soil be removed. The Uniform Federal Policy QAPP was approved in June 2020 (Weston, 2020). Removal action completed in 2020, and further action will be included in the Parcel A ROD.
						Chromium groundwater contamination from IRP Site RBAAP-03	The groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1102	102	Water Well No. 1	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1103	103	Water Well No. 2	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This is the area of a former potable water well. This well was abandoned. This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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1104	104	Water Well No. 3	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	This is the area of a former potable water well. This well was abandoned. Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1105	105	Water Well No. 4	4	5	5	Well	This is the area of a former potable water well. This well was abandoned.
						PCBs in soil	Originally Category 4 based on location with AOC 8B. ASTs were cleaned and removed. The lines were drained, cleaned and capped (filled with a cement slurry). No known releases. A ROD to properly document these actions and decisions will be completed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCL as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1106	106	Water Well No. 5	3	3	4	PCBs in soils	This area represents a used potable water well. This is within the area of the PCB-contaminated soils due to deteriorated Galbestos panel. A TCRA was completed and approved in 2018. The removal actions were

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							completed in 2018. Awaiting final documentation.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1107	107	Covered Passage	5	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates
1108	108	Main Transformer Subst. No. 1	3	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1109	109	Main Transformer Subst. No. 2 and 3	7	5	5	PCBs in soil	Originally a Category 7 based on potential for PCBs to have impacted the soil adjacent from two transformers. Transformers are currently not leaking. Historical dielectric sampling for these transformers indicate that these are non-PCB containing transformers.

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						Chromium groundwater contamination from IRP Site RBAAP-03	The groundwater contamination within this area currently exceeds chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1110	110	Terminal House	4	5	5	PCBs in soil	Originally a Category 4 because of its location within AOC 8B. ASTs were cleaned and removed. The lines were drained, cleaned and capped (filled with a cement slurry). Known releases. A ROD to properly document these actions will be completed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1114	114	Tank, Water, Storage, 100,000 Gallons	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1117	117	Cooling Tower, Main Plant	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1118	118	Cooling Tower, Boiler House	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater

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							remediation is on-going. See RBAAP-03 for updates.
1119	119	Cooling Tower, Steel Plant	7	5	5	Contaminants in soil	Originally Category 7 based on location within SWMU 1 boundary. The required remediation actions at SWMU 1 (IWTP) were completed in 2015.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1120	120	Steel Plant and Emerg. Gen. No. 10	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1121	121	Loading Dock, Steel Plant	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1122	122	Crane Runway and Steel Storage Area	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1127	127	Storage Sewage Disposal Plant	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD.

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							See RBAAP-03 (ECP Study Section 3) for updates.
1130	130	Garage	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1131	131	Process Water Tank and System	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1133	133	Aisleway from Bldg. 10 to Line 7	5	5	5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1134	134	Restroom at Line 7	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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1145	145	Transformer Substation No. 17	7	6	5	PCBs in Soil	<p>Originally Category 7 based on potential for PCBs to have impacted the soil adjacent from two transformers (PCB concentrations of 28 mg/kg and 134 mg/kg).</p> <p>This area was excluded from further sampling, as this area is an active outdoor electrical substation. The area is fenced, secured and marked. Previous soil sample results from 2008 had a maximum concentration of 9.5 mg/kg PCBs. Although these results are above RSLs, it is below the TSCA action levels. The area will remain secured and marked (Weston, 2018d).</p> <p>During the site reconnaissance in 2019 and then confirmed by the RLRA in 2020, one transformer was within this substation was found to be leaking (weapage). Historical dielectric fluid sampling indicates that easternmost transformer is PCB contaminated, and the other two are non-PCB containing. The transformer pad was double rinse washed. Additional remediation activities will be incorporated into the Final ROD for Parcel A.</p> <p>This area is now ECP Category 5 due to its proximity to the groundwater contamination plume.</p>
						Chromium groundwater contamination from IRP Site RBAAP-03	<p>Groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.</p>

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1146	146	Transformer Substation No. 18	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1147	147	Transformer Substation No. 19	3	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1148	148	Cooling Tower, Building 13	3	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1150	150	Compressor, Air	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1151	151	Compressor, Air	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1152	152	Motor Generator Housing	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							remediation is on-going. See RBAAP-03 for updates.
1154	154	Compressor, Air	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1155	155	Compressor, Air	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1156	156	Production Building – Heat Treat	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1157	157	Compressor, Air	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1158	158	Water Well No. 6	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area represents a used potable water well. This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1159	159	Sandblast Building	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1160	160	Covered Storage Warehouse	3	3	4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates
1162	162	Autodin A.B. Terminal Bldg. - Training Rm	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1164	164	Paint Pumping Building	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1166	166	Paint Pumping Building	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1167	167	Air Compressor No. 8	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1169	169	Paint Spraying Facility	5	5	5	VOCs in soil	Samples collected in 2018 (FOSET Data gap): BTEX compounds were found in the results, but all results were below screening levels.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1171	13	Austempler Facility – Furnace room	3	3	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1172	172	Former Fire Department	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1175	175	Generator Building	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1176	176	Switching Station (Electrical)	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1177	177	Equipment Wash Facility, Sump, Oil water separator.	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1181	181	Phosphate Facility	3	3	5	PCBs in soils	This is within the area of the PCB contaminated soils due to deteriorated Galbestos panel. A TCRA was completed and approve in 2018. The removal actions were completed in 2018 and further action will be included in the Parcel A ROD.
						Chromium groundwater contamination from IRP Site RBAAP-03	The groundwater within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1182	182	Ground Water Treatment Facility	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1184	184	Flammable Storage Warehouse	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1185	185	Air Compressor Building	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1186	186	Haz-Bin Storage Containment Structure	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1187	187	Haz-Bin Storage Containment Structure	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1188	188	Haz-Bin Storage Containment Structure	1	1	1	No contamination	No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the area of groundwater contamination.
1189	189	Land Vehicle Fuel Disp Sta Gas/Diesel	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1190	190	Land Vehicle Fuel Disp Sta Propane	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
1192	192	Ground Water Treatment Plant Office	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
1195	195	Transformer Substation No. 20	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
1196	196	Transformer Substation No. 21	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
2002		West Parking	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
2003		South Parking	3	3	5	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume, and the northwestern portion of this location is within an area that has exceeded chromium MCLs. See RBAAP-03 (ECP Study Section 3) for updates.
2005		West Utilities	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
2006		East Utilities	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
2007		Southeast Utilities	1	1	1	No contamination	No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the Area of groundwater contamination.
2007		Southeast Utilities	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
2008		South Utilities	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
2009		North Open Storage	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
2011		Central Storage	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
2013		North Warehouse Storage	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
2014		West Warehouse Storage	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
2015		Water Storage	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
2016		South Warehouse Storage	3	6	5	PCBs in soils	This is within the area of the PCB contaminated soils. The soils are contaminated with PCBs due to deteriorated Galbestos panels. A TCRA was completed and approved in 2018. The removal actions were completed in 2018. Final actions will be included in the forthcoming ROD for Parcel A.
						Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates
2017		West Railroad Storage	3	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs

Table 2

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
							as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
2018		East Railroad Storage	3	3	3	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume, however the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
2019		Fuel Storage	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
2020		Hazardous Waste Storage	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
2021		Administration Open Area	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
2022		Medical Open Area	5	5	5	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

Table 2

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ECP Section (2006)	Location (Building or Feature #)	Site Name/Identifier (Location)	ECP Category (2006)	ECP Category (2019)	ECP Category (2026)	Constituent (potential and confirmed)	Remedial actions
2023	7	Production Open Area (courtyard area within Building 7)	5	7	5	PCB Contamination in Concrete	In February 2019, a technical memo detailed all the sampling efforts that have taken place within the courtyard areas. It recommended that concrete with PCB results greater than 0.94 mg/kg PCBs be removed (Weston, 2019). There are six areas that had PCB results above action levels, and they are located between Building 7 and 1, and 1 and 2 need to have concrete removed. This work was integrated into the same work plan as other PCB remediation activities on site. The Uniform Federal Policy QAPP that includes this work was approved in June 2020 (Weston, 2020). It detailed that the areas that needed PCB removal actions would have concrete removed 10 feet by 20 feet in half-inch intervals until the action levels are achieved. The activities were completed in 2020 and are pending final documentation in the Parcel A ROD.
						Galbestos panels	This building was identified to have Galbestos panels. The panels have been removed.
						Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

Environmental Condition of the Property Categories:

Category 1: Areas in which no release or disposal of hazardous substances or petroleum products has occurred, and to which there has been no migration of such substances from adjacent areas.

Table 2

Notification of Hazardous Substance Storage, Release, or Disposal
Environmental Condition of Property Report Update (2026)

Category 2: Areas in which only release or disposal of petroleum products has occurred.

Category 3: Areas in which release, disposal, or migration of hazardous substances has occurred, but in concentrations that do not require a removal or other remedial response.

Category 4: Areas in which release, disposal, or migration of hazardous substances has occurred, but all removal or other remedial actions necessary to protect human health and the environment have been taken.

Category 5: Areas in which release, disposal, or migration of hazardous substances has occurred, and removal or other remedial actions are under way, but all required actions have not yet been taken.

Category 6: Areas in which release, disposal, or migration of hazardous substances has occurred, but required remedial actions have not yet been completed.

Category 7: Areas that have not been evaluated or require additional evaluation.

Table 3: RIVERBANK AAP TRANSFORMERS AND OTHER PCB CONTAINING EQUIPMENT

	Transformer Location	Transformer Volume (Gallons)	Manufacture Date	Containing Oil During Operation (Yes/No)	Condition (Good/Poor)	Laboratory Results (mg/L) (Year Sampled)	Comment
	Main #1	1,633	Unknown	Y	G	10 (1996); 14 (2001)*; 18 (2002)*	
	Main #2	1633	Unknown	Y	G	7 (1996)	
	Main #3	1633	Unknown	Y	G	13 (1996)	
	SUB 1	450	Unknown	Y	G	125 (1996)	
	SUB 2 East	450	Unknown	Y	G	3 (1996)	
	SUB 2 West	450	Unknown	Y	P	14 (1996)	SUB 2 West leakng.
	SUB 4 East	129	Unknown	Y	G	Unknown	
	SUB 4 Center	129	Unknown	Y	G	Unknown	
	SUB 4 West	129	Unknown	Y	G	Unknown	
	SUB 6	600	1986	Y	G	50 (2002)*; 44.6 (2016)	
	SUB 7	680	Unknown	Y	G	Unknown	
	SUB 8	680	1954	Y	G	4.2 (2016)	
	SUB 9	Unknown	Unknown	Y	G	Unknown	
	SUB 10	680	1954	Y	G	7 (2002)*; 5.8 (2016)	
	SUB 11	unknown	unknown	Y	G	Unknown	
	SUB 12	975	1952	Y	G	2.1 (2016)	
	SUB 13 West	800	1952	Y	G	60 (1996); 53 (2002)*	
	SUB 13 Center	750	1952	Y	G	57 (1996); 46 (2002)*	
	SUB 13 East	750	1952	Y	G	443 (1996); 363 (2002)*	
	SUB 14 West	145	Unknown	Y	G	3 (1996)	
	Sub 14 Center	145	Unknown	Y	G	<1 (1996)	
	Sub14 East	145	Unknown	Y	G	<1 (1996)	
	SUB 16	210	Unknown	Y	G	73 (1996)	
	SUB 17 Center	750	Unknown	Y	P	44 (1996); 34 (2001)*; 38 (2002)*	SUB 17 is leaking.
	SUB 17 West	750	Unknown	Y	P	196 (1996); 163 (2001)*; 187 (2002)*	SUB 17 is leaking.
	SUB 17 East	750	1952	Y	P	50 (1996); 30 (2001)*; 33 (2002)*	SUB 17 is leaking.
	SUB 18	966	Unknown	Y	G	5246.5 (2016)	
	SUB 19	Unknown	Unknown	Y	G	Unknown	
	SUB 20	Not Oil Containing	Unknown	N	G	-----	
	SUB 21	Not Oil Containing	Unknown	N	G	-----	
	SUB 22	536	2004	Y	G	3.4 (2016)	
Potheads							
	SUB 8	12	Unknown	Y	P	Unknown	1 Pothead
	SUB 9	12	Unknown	Y	P	Unknown	1 Pothead
	SUB 10	12	Unknown	Y	P	Unknown	1 Pothead
	SUB 12	12	Unknown	Y	P	Unknown	1 Pothead
	Former Sub 15 (Building 1)	12	Unknown	Y	P	Unknown	1 Pothead
	Building 8	12	Unknown	Y	P	Unknown	1 Pothead
	Building 13	12	Unknown	Y	P	Unknown	2-Potheads

Oil Reservoir Tanks

11 Units located within Building 8	100 each (1,100 total)	Unknown	Y		Unknown	Each oil reservoir tank stores approximately 100 gallons of oil. Equipment no longer in use and oil has been drained. This equipment is stored inside. They will be disposed of off-site.
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Transformer Equipment Removed from RBAAP

SUB 3	450, 450	Unknown	Y	-----	Unknown	
SUB 5	1250, 1250, 1250	Unknown	Y	-----	24 (2016)	When operational, had three transformers within this substation. All have been removed.
SUB 15	680, 680	Unknown	Y	-----	Unknown	

Note: The table was taken from the 2019 ECP Update Report. During the 2019 ECP Update, a full inventory of transformers and other electrical equipment was completed.

Sources:

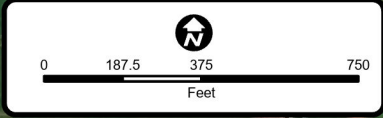
2016 = Applied Power Testing Inspection Lab Sheets

2001 and 2002 *= SD Meyers Inspection Report Data

1996 = Norris Industries Transformer Inspection Lab data



* Source does not have Labsheets. Data came from Lab Inspections from SD Meyers 2005

Figures



DISCLAIMER: THE DATA UTILIZED TO CONSTRUCT THIS MAP EXHIBIT SHOULD BE TREATED AS A Microsoft Vantor REFERENCE ONLY AND IS BY NO MEANS A SURVEY GRADE REPRESENTATION OF THE USAGE BOUNDARY.

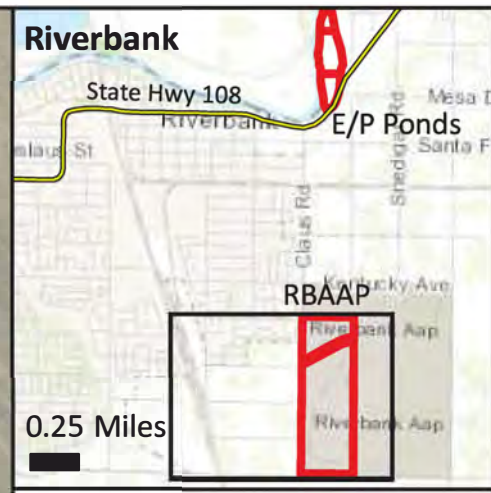
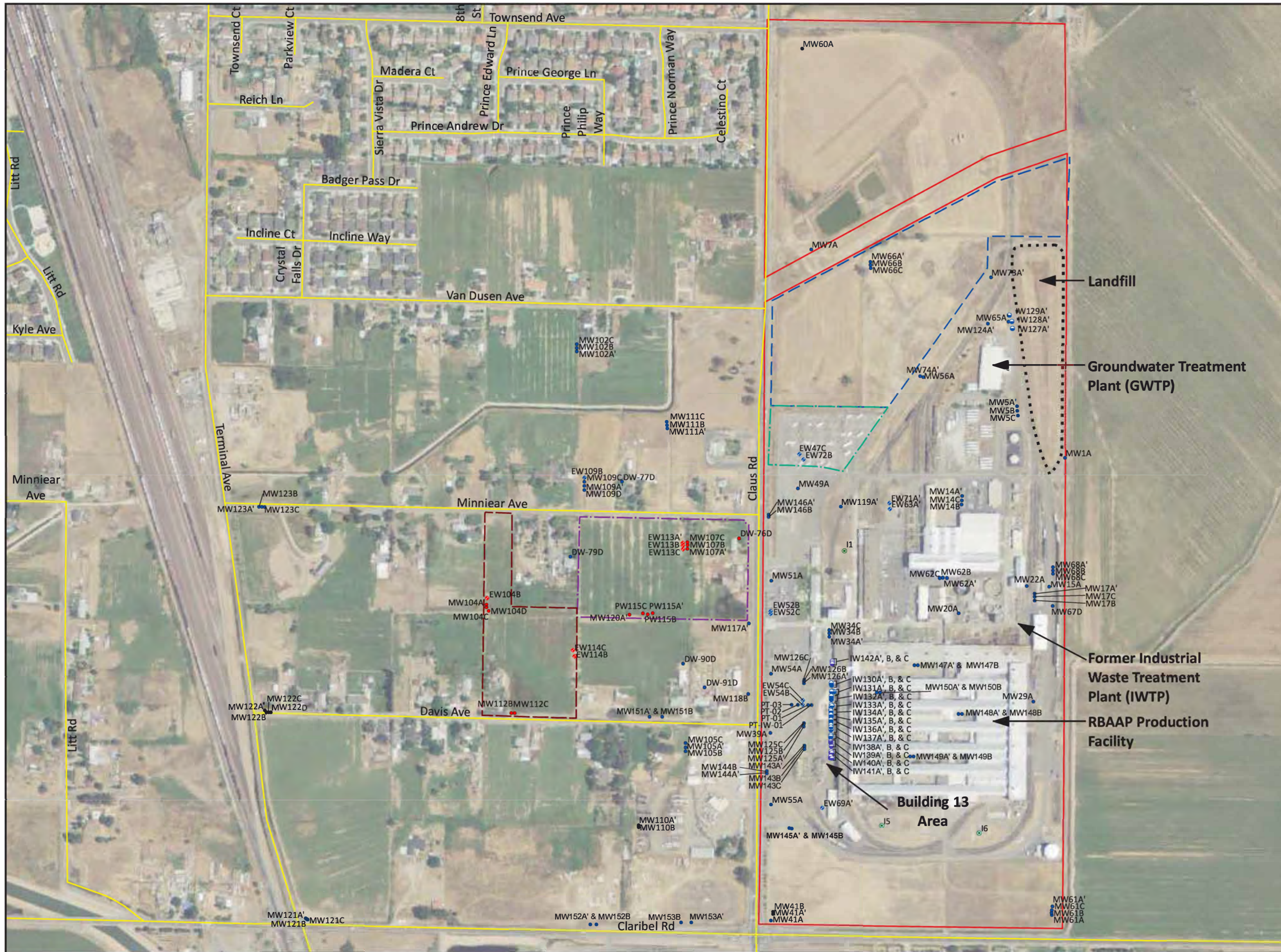
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LEGEND	
	BRAC Parcels
	Disposed October 2017

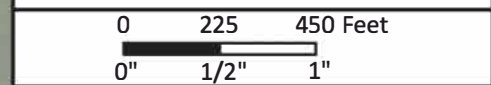
RIVERBANK ARMY AMMUNITION PLANT
BRAC PARCELS,
STANISLAUS COUNTY, CALIFORNIA

US ARMY CORPS
OF ENGINEERS
BASE REALIGNMENT
AND CLOSURE



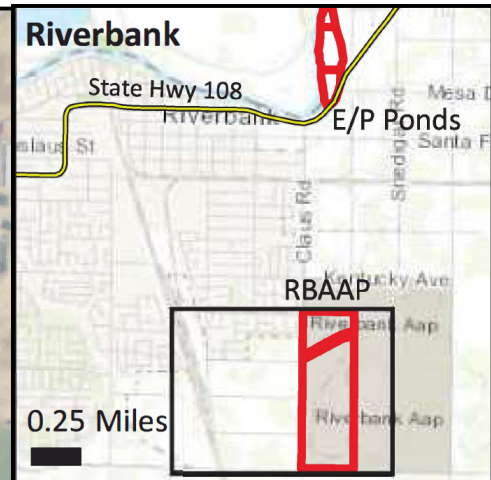
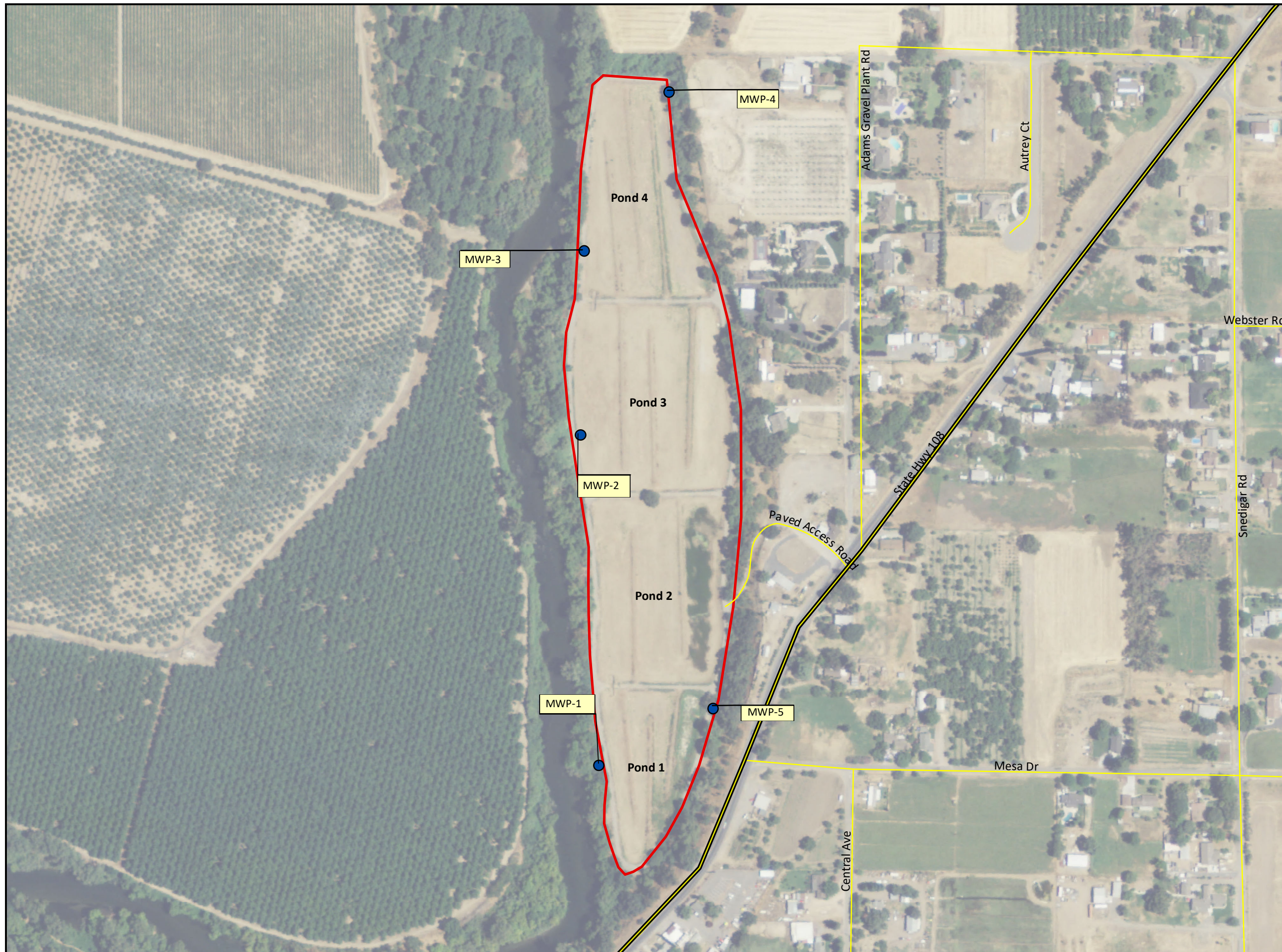


- Notes:**
- Monitoring Well
 - ⊕ Extraction Well
 - ⊕ Inaccessible Monitoring Well
 - ⊕ Inaccessible Extraction Well
 - ⊕ Injection Well
 - ⊕ Production Well
 - Streets
 - Highways
 - ▭ RBAAP Boundary
 - ⋯ Landfill Boundary
 - ▭ Parcel 2
 - ▭ Parcel 2A
 - ▭ APN 075023007
 - ▭ APN 075023005

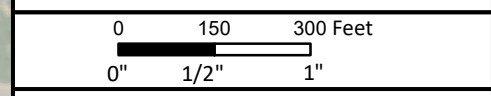


Well Location Map

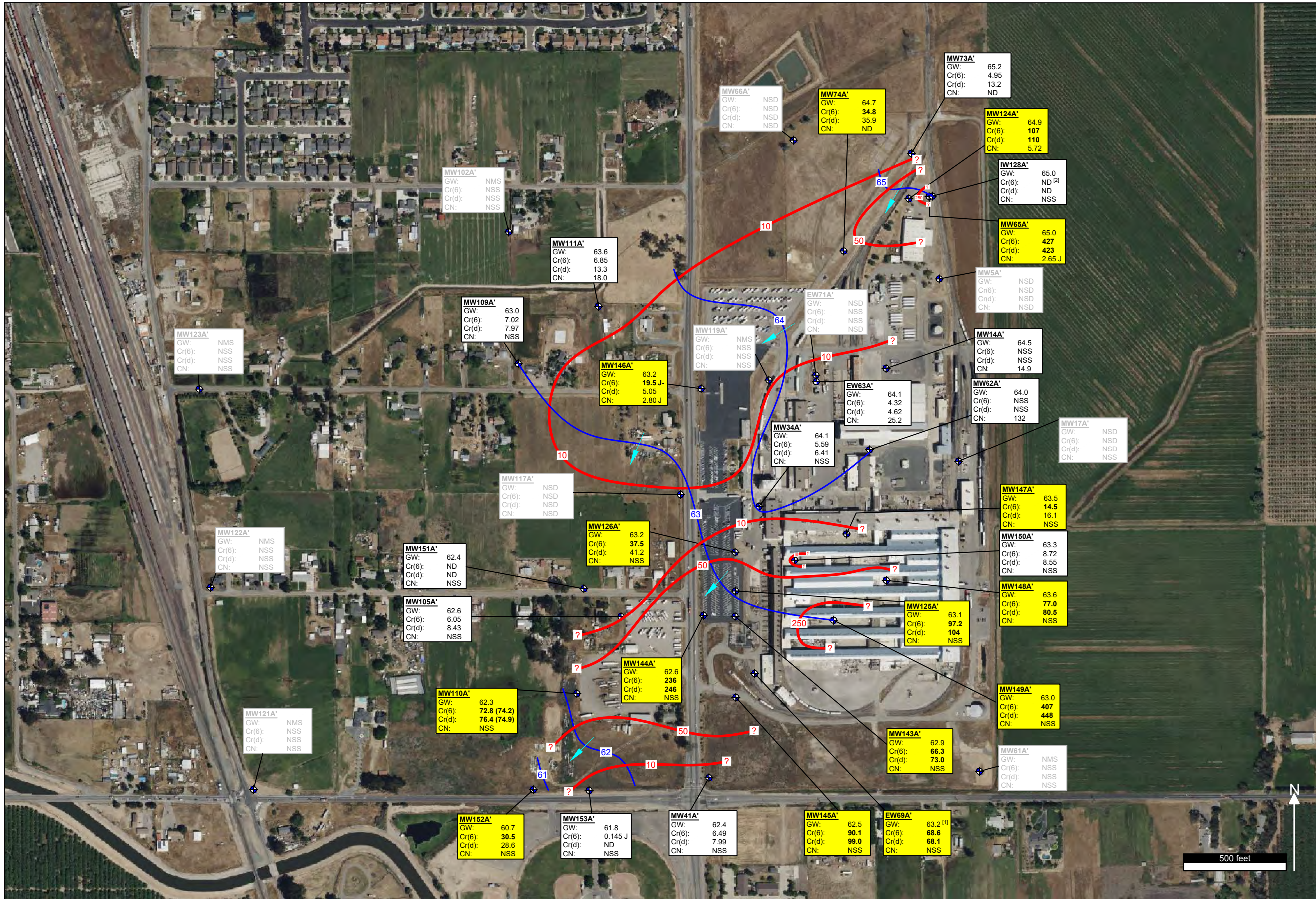
Ahtna Figure **2**



- Notes:**
- Monitoring Well
 - Highways
 - Streets
 - Evaporation/Percolation Pond Boundary (approximate; not a product of survey)



Evaporation/Percolation Pond Map



Legend

- Groundwater Well
- Lines of equal groundwater elevation
- Groundwater Flow Direction
- Lines of equal hexavalent chromium concentration
- 10** Hexavalent chromium concentration in micrograms per liter (ug/L)
- ?** Indicates uncertainty in the plume extents consequent to data gaps

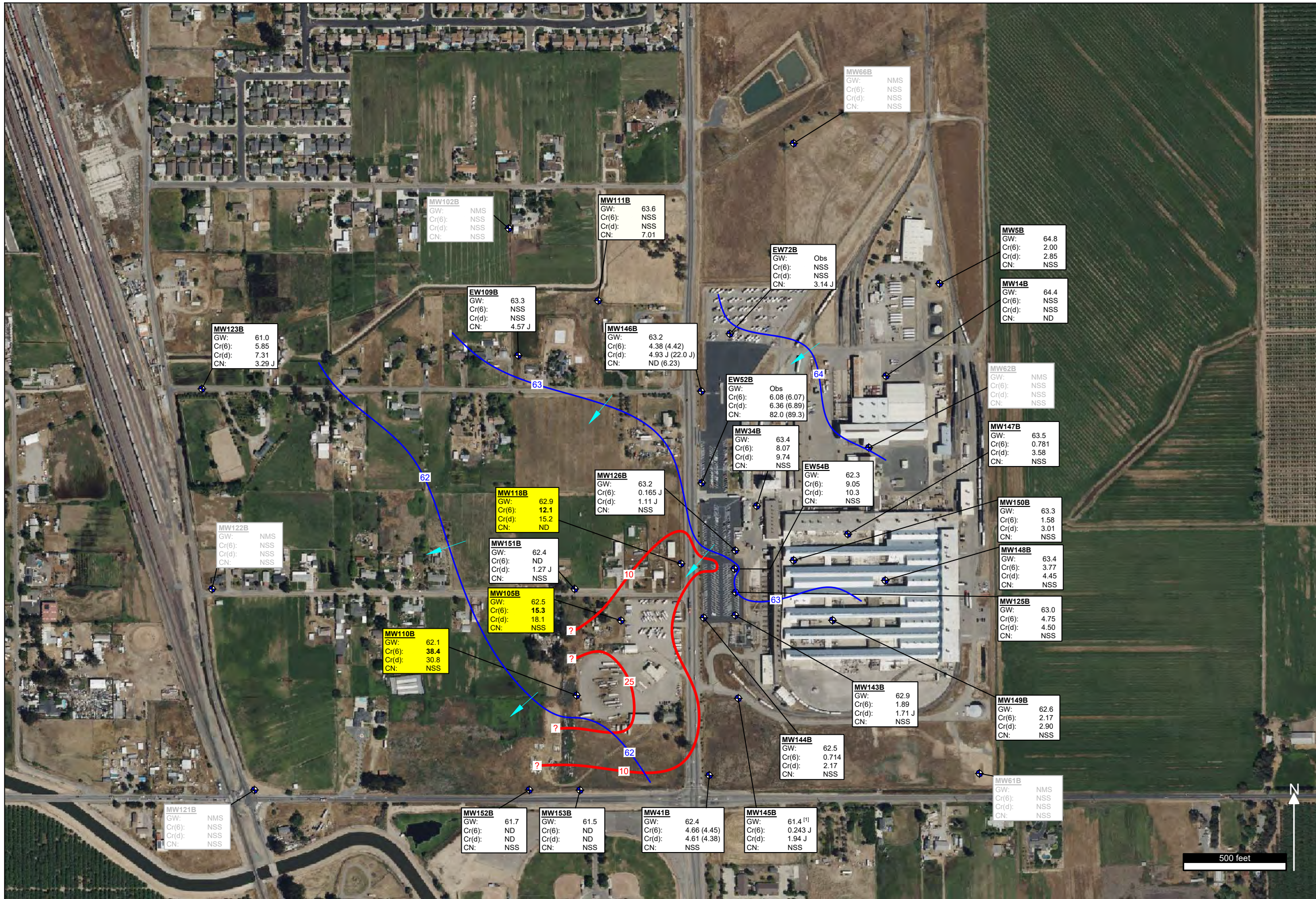
- Notes:**
- [1] The groundwater elevation from EW69A' was excluded from the contouring analysis.
 - [2] The hexavalent chromium concentration at IW128A' was excluded from the contouring analysis.
- The Action Levels are 10 ug/L for hexavalent chromium, 50 ug/L for dissolved chromium and 150 ug/L for cyanide. Concentrations exceeding the Action Levels are indicated in **BOLD** and with yellow data boxes
 - Results from field duplicate samples are provided in parentheses
 - CN: Cyanide
 - COC: Constituent of concern
 - Cr(6): Hexavalent chromium
 - Cr(d): Dissolved chromium
 - GW: Groundwater elevation in feet above mean sea level (2-3 June 2025)
 - J: Estimated value, (+/-) high or low bias
 - ND: Analyte not detected
 - NSD: No sample, dry well or insufficient water for sampling
 - NMS: No measurement scheduled
 - NSS: No sample scheduled

Groundwater Isocontour and COC Isoconcentration Map (2Q25, A'-Zone)

Semiannual Groundwater Monitoring, Landfill, and Groundwater Treatment Report (2025 Second Quarter)
Riverbank Army Ammunition Plant
Riverbank, California

Figure

4



Legend

- Groundwater Well
- Lines of equal groundwater elevation
- Groundwater Flow Direction
- Lines of equal hexavalent chromium concentration
- 10** Hexavalent chromium concentration in micrograms per liter (ug/L)
- ?** Indicates uncertainty in the plume extents consequent to data gaps

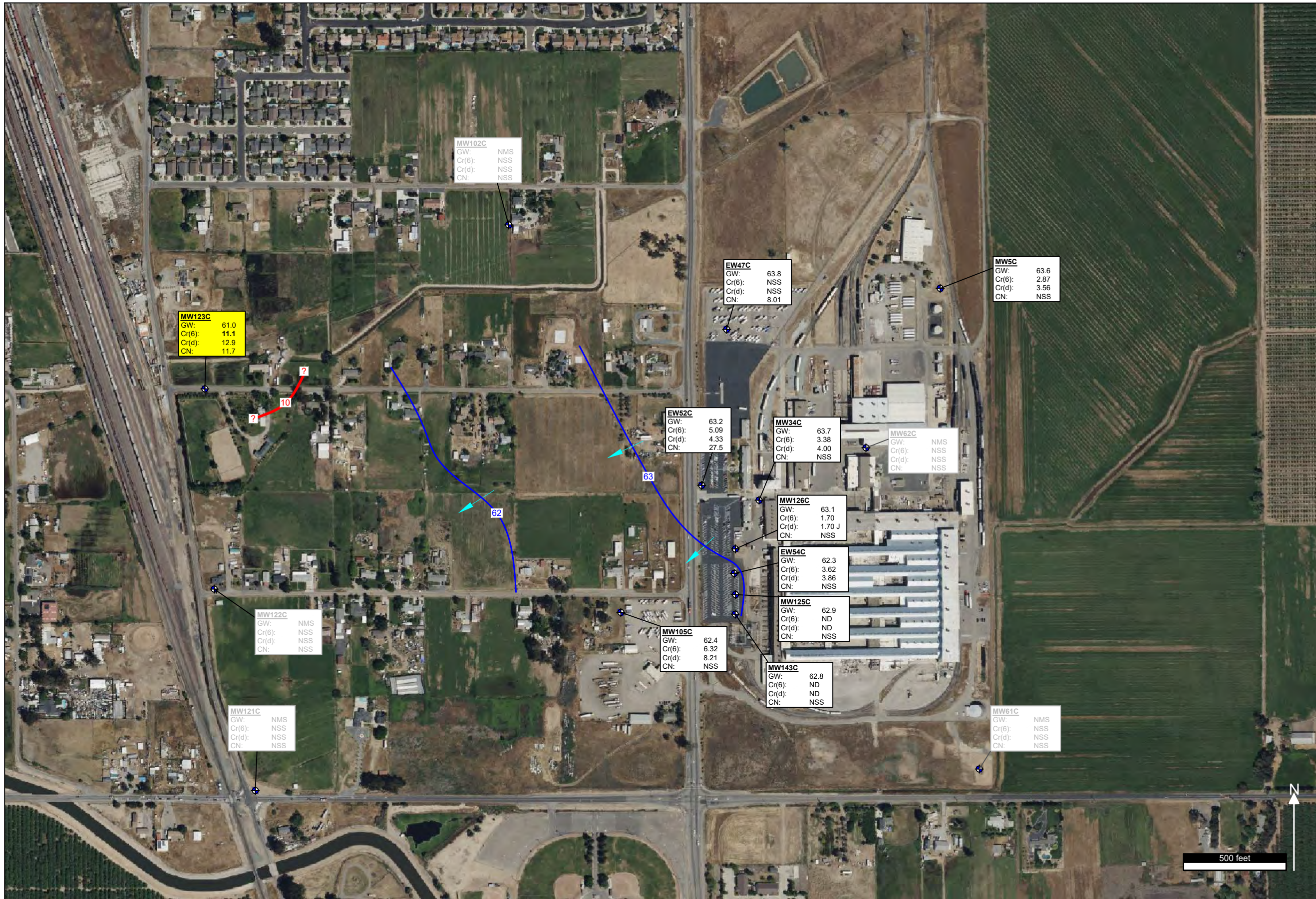
- Notes:**
- [1] The groundwater elevation at MW145B was excluded from the contouring analysis due to a suspected erroneous measurement.
 - The Action Levels are 10 ug/L for hexavalent chromium, 50 ug/L for dissolved chromium and 150 ug/L for cyanide. Concentrations exceeding the Action Levels are indicated in **BOLD** and with yellow data boxes
 - Results from field duplicate samples are provided in parentheses
 - CN: Cyanide
 - COC: Constituent of concern
 - Cr(6): Hexavalent chromium
 - Cr(d): Dissolved chromium
 - GW: Groundwater elevation in feet above mean sea level (2-3 June 2025)
 - J: Estimated value, (+/-) high or low bias
 - ND: Analyte not detected
 - NMS: No measurement scheduled
 - NSS: No sample scheduled
 - Obs: Water level could not be measured due to an obstruction in the well

Groundwater Isocontour and COC Isoconcentration Map (2Q25, B-Zone)

Semiannual Groundwater Monitoring, Landfill, and Groundwater Treatment Report (2025 Second Quarter)
Riverbank Army Ammunition Plant
Riverbank, California

Figure

5



Legend

- Groundwater Well
- Lines of equal groundwater elevation
- Groundwater Flow Direction
- Lines of equal hexavalent chromium concentration
- 10** Hexavalent chromium concentration in micrograms per liter (ug/L)
- ?** Indicates uncertainty in the plume extents consequent to data gaps

- Notes:**
- The Action Levels are 10 ug/L for hexavalent chromium, 50 ug/L for dissolved chromium and 150 ug/L for cyanide. Concentrations exceeding the Action Levels are indicated in **BOLD** and with yellow data boxes
 - Results from field duplicate samples are provided in parentheses
 - CN: Cyanide
 - COC: Constituent of concern
 - Cr(6): Hexavalent chromium
 - Cr(d): Dissolved chromium
 - GW: Groundwater elevation in feet above mean sea level (2-3 June 2025)
 - J: Estimated value, (+/-) high or low bias
 - ND: Analyte not detected
 - NMS: No measurement scheduled
 - NSS: No sample scheduled

Groundwater Isocontour and COC Isoconcentration Map (2Q25, C-Zone)

Semiannual Groundwater Monitoring, Landfill, and Groundwater Treatment Report (2025 Second Quarter)
Riverbank Army Ammunition Plant
Riverbank, California

Figure

6

Appendix A
Site Reconnaissance Photos

ENCLOSURE 1 – RBAAP Parcel A – 2025 Reconnaissance Photos



Building 7 – View toward East
16 SEPTEMBER 2025



Courtyard Between Bldgs. 7 & 1 – View toward East
16 SEPTEMBER 2025



Courtyard Between Bldgs. 1 & 2 – View toward East
16 SEPTEMBER 2025



Building 1 – View toward East
16 SEPTEMBER 2025



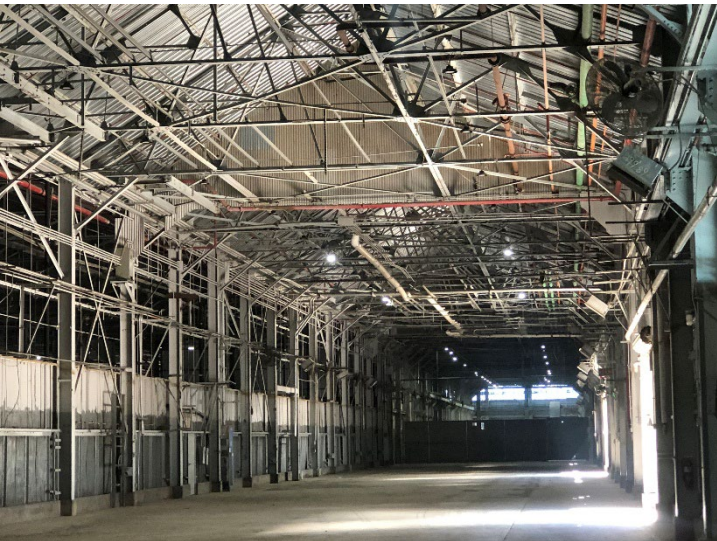
Building 2 – View toward East
16 SEPTEMBER 2025



Bldg. 160 Between Bldgs. 2 & 3 – View toward East
16 SEPTEMBER 2025



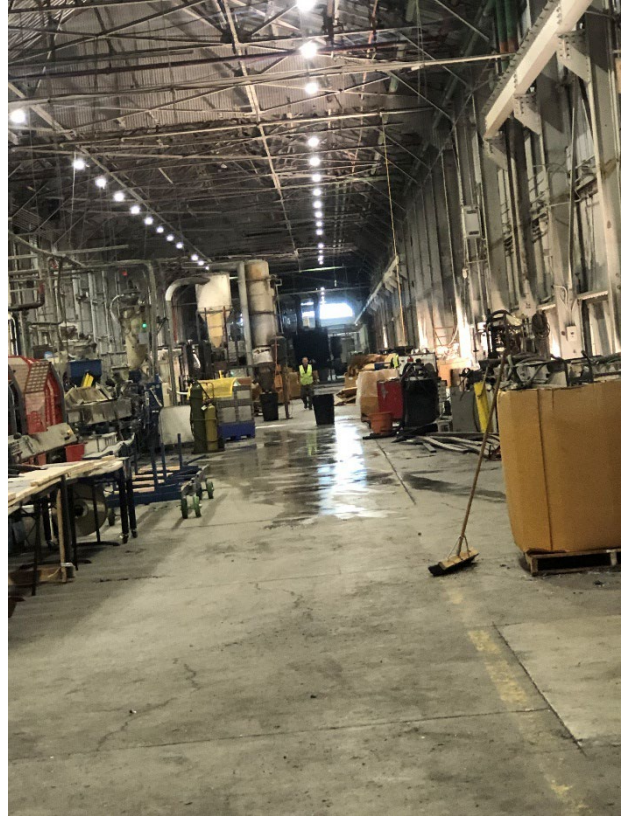
Bldg. 16 Between Bldgs. 3 & 4 – View toward East
16 SEPTEMBER 2025



Building 3 – View toward East
16 SEPTEMBER 2025



Bldg. 80 Between Bldgs. 3 & 4
16 SEPTEMBER 2025



Bldg. 4 – View toward East
16 SEPTEMBER 2025



Bldg. 83 Between Bldgs. 3 & 4
16 SEPTEMBER 2025



Bldgs. 147 & 157 Between Bldgs. 4 & 5
16 SEPTEMBER 2025



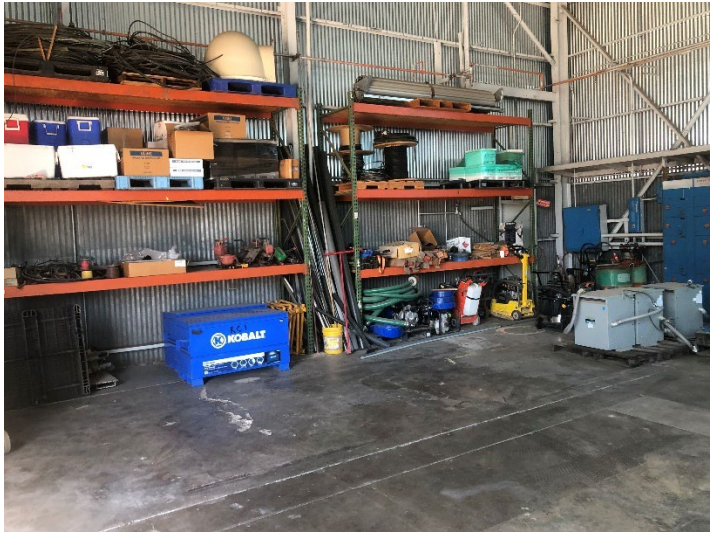
Bldg. 6 – View toward East
16 SEPTEMBER 2025



Bldg. 5 – View toward West
16 SEPTEMBER 2025

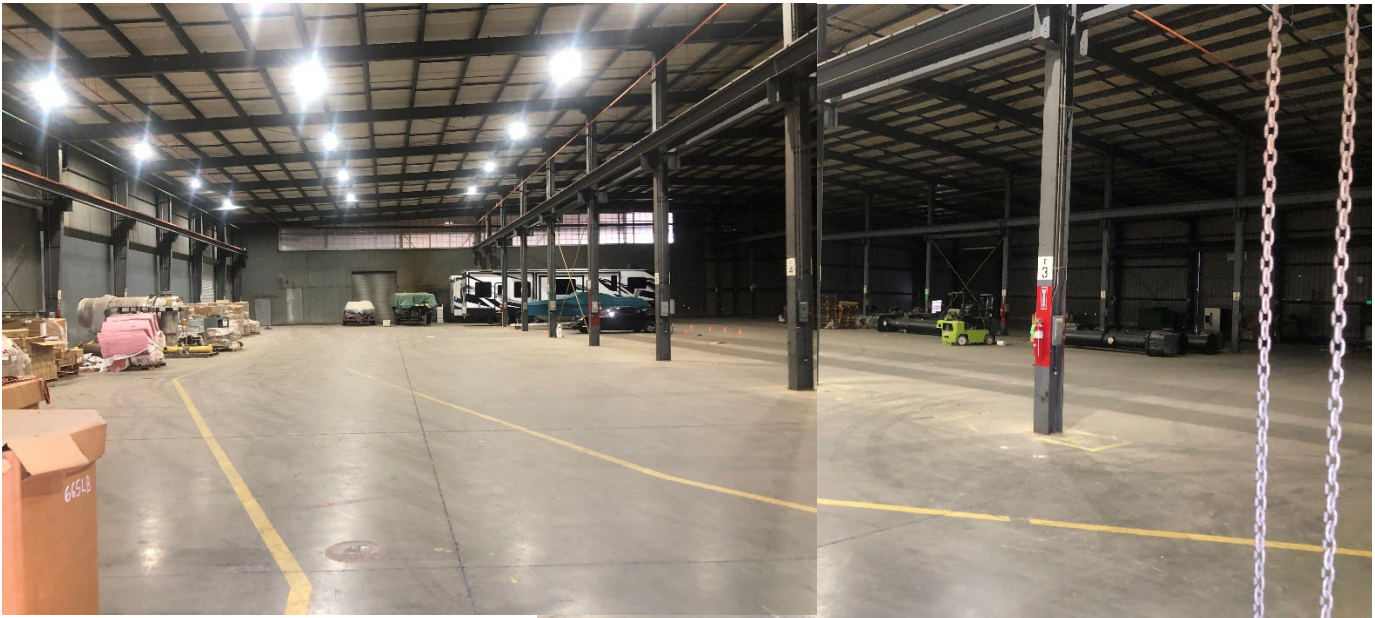


Bldgs. 43 & 173 – View toward Southwest
16 SEPTEMBER 2025



Bldg. 12 – View toward South
16 SEPTEMBER 2025

Bldg. 12 – View toward Northeast
16 SEPTEMBER 2025



Bldg. 120H – View toward West and Northwest
16 SEPTEMBER 2025



Bldg. 120 – View toward South
16 SEPTEMBER 2025



Bldg. 172 – View toward East
16 SEPTEMBER 2025



Bldg. 169 – View toward Northeast
16 SEPTEMBER 2025



Bldg. 159 – View toward North
16 SEPTEMBER 2025



Bldg. 11 – View toward South
16 SEPTEMBER 2025



Bldg. 11 – View toward South
16 SEPTEMBER 2025



Bldg. 137 – View toward Southeast
16 SEPTEMBER 2025



Bldg. 156 – View toward Southwest
16 SEPTEMBER 2025



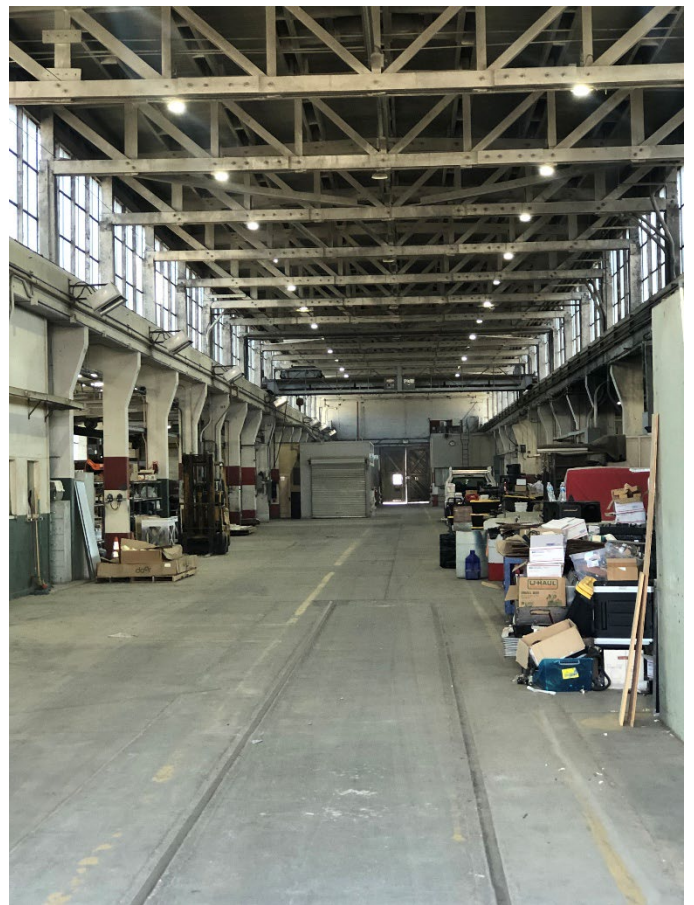
Bldg. 15 – View toward West
17 SEPTEMBER 2025



Bldg. 130 – View toward Northwest
17 SEPTEMBER 2025



Poles at Rail Spur – View toward Southeast
17 SEPTEMBER 2025



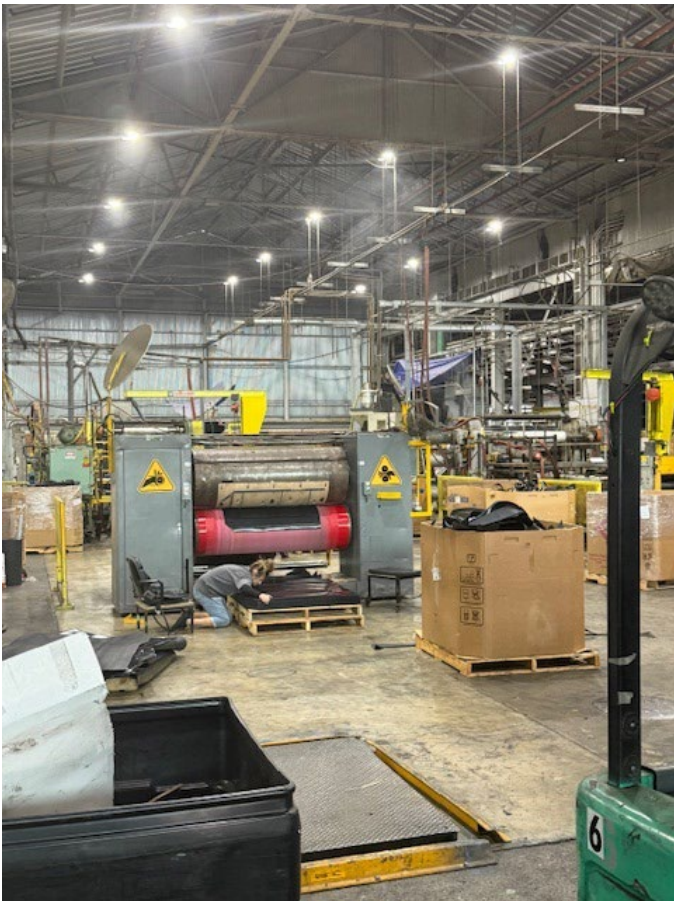
Bldg. 9 – View toward South
17 SEPTEMBER 2025



Bldg. 15 – View toward East
17 SEPTEMBER 2025



Bldg. 8 – View toward South
18 SEPTEMBER 2025



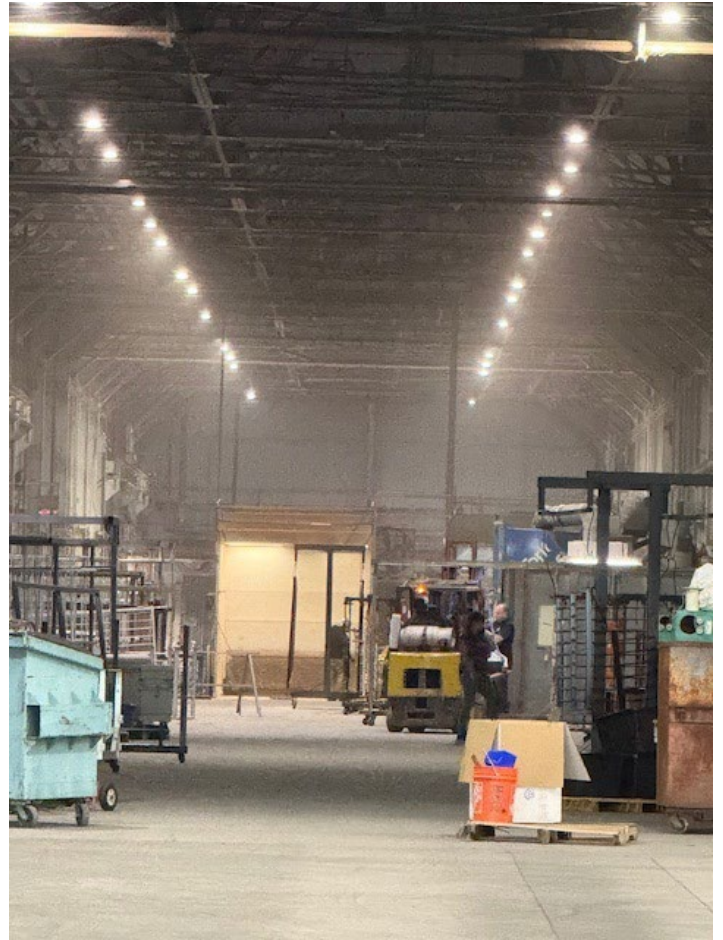
Bldg. 46 – View toward West
18 SEPTEMBER 2025



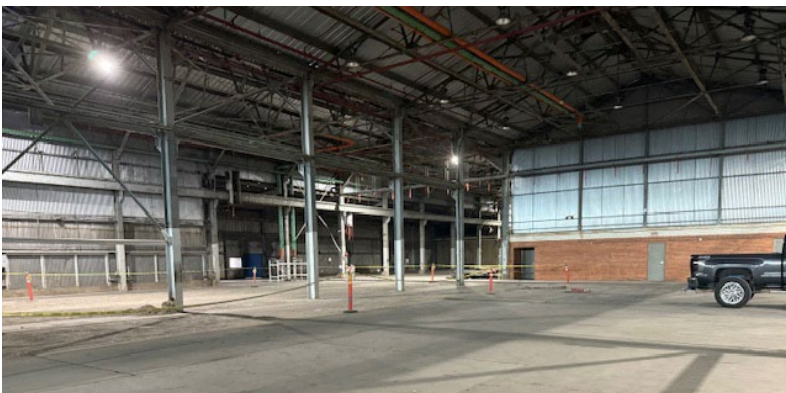
Bldg. 48 – View toward Southwest
18 SEPTEMBER 2025



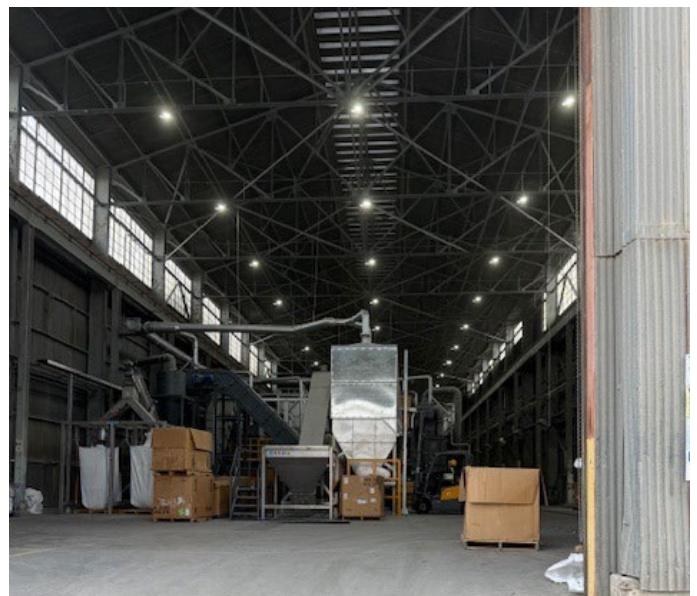
Bldg. 49 – View toward West
18 SEPTEMBER 2025



Bldg. 5 – View toward West
18 SEPTEMBER 2025



Bldg. 50 – View toward Southwest
18 SEPTEMBER 2025



Bldg. 120 – View toward East
18 SEPTEMBER 2025

RECONNAISSANCE PHOTOS OF TRANSFORMER SUBSTATIONS



Substation 4 – View toward Southwest
17 SEPTEMBER 2025



Substation 1 – View toward East
17 SEPTEMBER 2025



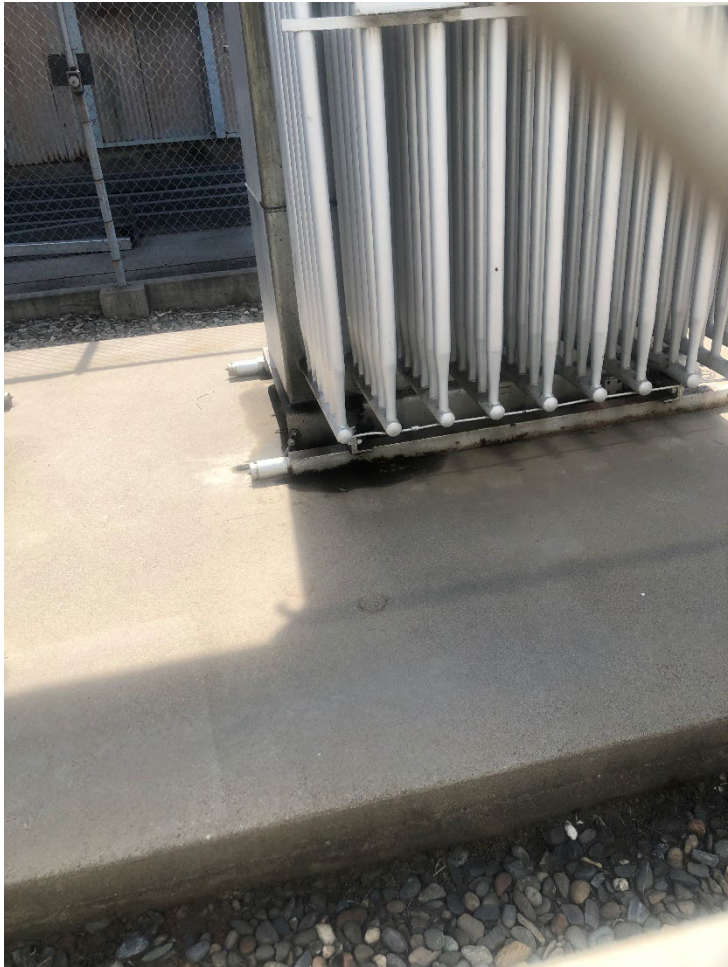
Substation 12 – View toward Northeast
17 SEPTEMBER 2025



Substation 12 – View toward West
17 SEPTEMBER 2025



Substation 7 – View toward North
17 SEPTEMBER 2025



Substation 7 – View toward South
17 SEPTEMBER 2025



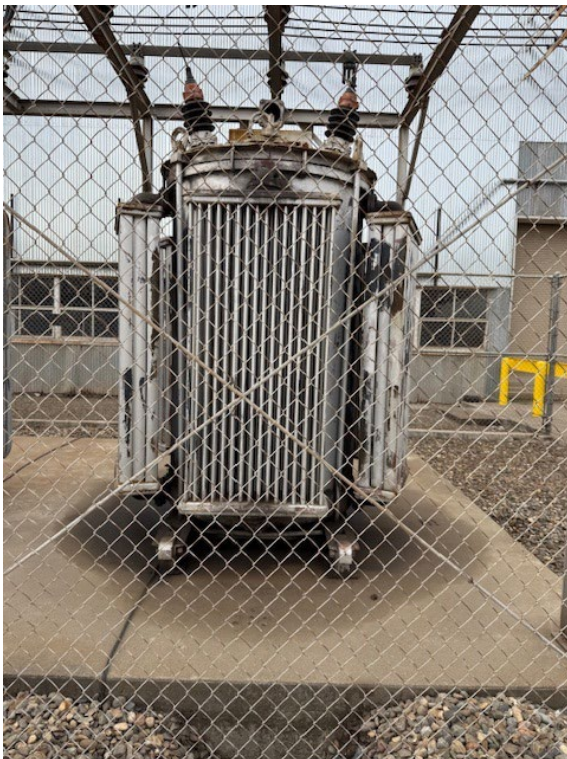
Transformer West of Building 13 –
View toward West
17 SEPTEMBER 2025



Substation 18 – View toward Southeast
18 SEPTEMBER 2025



Substation 18 – View toward Southeast
18 SEPTEMBER 2025



Substation 17 (west transformer) –
View toward South
18 SEPTEMBER 2025



Substation 17 (center transformer) –
View toward South
18 SEPTEMBER 2025



Substation 17 (east transformer) –
View toward South
18 SEPTEMBER 2025



Substation 14 (east transformer) –
View toward South
18 SEPTEMBER 2025



Substation 14 (center transformer) –
View toward South
18 SEPTEMBER 2025



Substation 14 (west transformer) –
View toward South
18 SEPTEMBER 2025

Appendix B

Table 1 from ACM Inspection Report: Asbestos Inventory Summary

Table 1. Asbestos Inventory Summary

Building No.	Name	Year Built	Area (ft ²)	Survey Dates		Number of Samples		Asbestos?	Friable?	Non-Friable?	Damaged ACM?	Asbestos Debris?
				Begin	End	Asbestos PLM	Asbestos Point Count					
1	Former Production Line Area	1951	34,201	7/11/2018	7/12/2018	78	3	Yes	Yes	Yes	Yes	Yes
2	Former Production Line Area	1951	34,201	7/12/2018	7/12/2018	54	0	Yes	Yes	Yes	Yes	Yes
3	Former Production Line Area	1951	34,201	7/13/2018	7/13/2018	54	0	Yes	Yes	Yes	Yes	Yes
4	Former Production Line Area	1951	34,201	7/16/2018	7/16/2018	51	0	Yes	Yes	Yes	Yes	Yes
5	Former Production Line Area	1951	34,201	7/13/2018	7/13/2018	66	0	Yes	Yes	Yes	Yes	Yes
6	Former Production Line Area	1951	34,201	7/16/2018	7/16/2018	87	0	Yes	Yes	Yes	Yes	Yes
7	Former Production Line Area	1951	71,622	7/17/2018	7/17/2018	140	6	Yes	Yes	Yes	Yes	Yes
8	Former Production Line Area	1951	48,225	7/17/2018	7/18/2018	66	3	Yes	Yes	Yes	Yes	Yes
9	Machine Shop Offices	1951	37,800	7/3/2018	7/4/2018	114	0	Yes	Yes	Yes	Yes	No
10	Crib/Warehouse/Office National Guard	1951	20,338	6/27/2018	6/28/2018	85	0	Yes	No	Yes	No	No
11	Paint & Oil Storage, Recycling & Transport	1951	12,451	7/3/2018	7/4/2018	54	0	Yes	No	Yes	Yes	Yes
12	Former Boiler House - Now Tenant Occupied	1951	6,240	6/26/2018	6/26/2018	54	0	Yes	No	Yes	Yes	No
13	Production Line - Rectifier House	1951	38,000	6/28/2018	6/29/2018	125	0	Yes	Yes	Yes	Yes	Yes
14	Security Office & Locker Rooms	1951	10,888	7/2/2018	7/2/2018	78	6	Yes	No	Yes	No	No
15	Transformer Servicing Facility	1951	3,200	6/27/2018	6/27/2018	21	0	Yes	Yes	Yes	No	No
16	Office and Gate House	1951	3,740	7/3/2018	7/4/2018	93	0	Yes	Yes	Yes	Yes	No
17	Administrative Office	1951	7,308	7/3/2018	7/4/2018	87	3	Yes	No	Yes	No	No
18	Cafeteria and Offices	1951	2,819	7/2/2018	7/2/2018	57	3	Yes	Yes	Yes	Yes	No
19	Production Restrooms	1951	501	6/19/2018	6/19/2018	33	3	Yes	Yes	Yes	Yes	No
20	Empty Barrel Storage	1951	14,800	6/5/2018	6/5/2018	0	0	No	NA	NA	NA	No
21	Plant Cafeteria	1951	6,916	7/9/2018	7/9/2018	78	4	Yes	Yes	Yes	No	No
22	Aisleway and Office	1951	1,976	6/20/2018	7/9/2018	39	0	Yes	No	Yes	Yes	No
23	Aisleway and Office	1951	2,652	6/20/2018	6/20/2018	60	3	Yes	No	Yes	Yes	No
24	Aisleway and Gage Laboratory	1952	1,976	7/9/2018	7/9/2018	54	0	Yes	No	Yes	Yes	No
25	Aisleway and Accounting Storage Area	1952	2,652	6/13/2018	6/19/2018	60	6	Yes	No	Yes	Yes	No
26	Aisleway and Instrument Storage Area	1951	1,976	6/18/2018	6/18/2018	69	3	Yes	No	Yes	Yes	No
27	Restroom and Passage	1951	1,053	7/9/2018	7/9/2018	45	3	Yes	No	Yes	Yes	Yes
28	Restroom and Passage	1951	1,053	7/9/2018	7/9/2018	48	0	Yes	No	Yes	Yes	No
29	Restroom	1951	1,053	6/19/2019	6/19/2019	33	2	Yes	No	Yes	No	No
30	Restroom and Passage	1951	1,053	6/13/2018	6/20/2018	66	0	Yes	Yes	Yes	No	No
31	Restroom and Passage	1951	1,053	6/20/2018	6/20/2018	45	0	Yes	No	Yes	Yes	No
32	Restroom and Passage	1951	1,053	7/5/2018	7/5/2018	51	6	Yes	No	Yes	Yes	No
33	Passage and Distribution PNL	1951	1,520	6/21/2018	6/21/2018	24	0	Yes	No	Yes	Yes	No
34	Passage and Office	1952	1,539	7/5/2018	7/6/2018	39	3	Yes	Yes	Yes	Yes	No
35	Passage and Emergency Generator #7	1952	1,539	7/5/2018	7/6/2018	39	0	Yes	Yes	Yes	Yes	No
36	Passage	1952	1,053	6/21/2018	6/21/2018	24	3	Yes	Yes	Yes	No	No
37	Passage and Office	1952	1,539	7/5/2018	7/6/2018	30	3	Yes	Yes	Yes	Yes	No
38	Passage	1951	1,539	6/21/2018	6/21/2018	19	0	Yes	Yes	Yes	No	No
39	Central Salvage Area	1952	2,112	7/5/2018	7/6/2018	21	0	Yes	No	Yes	No	No
43	Acid Neutralization/Cyanide Lab	1952	1,558	6/6/2018	6/6/2018	33	0	No	NA	NA	NA	No

Table 1. Asbestos Inventory Summary

Building No.	Name	Year Built	Area (ft ²)	Survey Dates		Number of Samples		Asbestos?	Friable?	Non-Friable?	Damaged ACM?	Asbestos Debris?
				Begin	End	Asbestos PLM	Asbestos Point Count					
44	Acid Neutralization/Cyanide Destruction	1952	12,240	6/7/2018	6/7/2018	15	0	Yes	No	Yes	No	No
45	Production Line	1952	7,293	7/10/2018	7/18/2018	18	0	Yes	Yes	Yes	Yes	No
46	Production Line	1952	8,200	7/10/2018	7/18/2018	21	0	Yes	Yes	Yes	Yes	No
47	Production Line and Emergency Gen #2	1952	8,360	7/10/2018	7/18/2018	30	3	Yes	Yes	Yes	Yes	No
48	Production Line and Office	1952	8,400	7/10/2018	7/18/2018	30	0	Yes	Yes	Yes	Yes	No
49	Production Line and Emergency Gen #4/5	1952	10,548	7/11/2018	7/18/2018	39	0	Yes	Yes	Yes	Yes	No
50	Production Line and Emergency Gen #6	1952	10,420	7/11/2018	7/18/2018	33	0	Yes	Yes	Yes	Yes	No
51	Laboratory Chemical and Metallurgical	1952	3,800	6/19/2018	6/19/2018	24	2	Yes	Yes	Yes	Yes	No
52	Transformer Area - Substation #10	1951	700	6/4/2018	6/4/2018	0	0	Yes	No	Yes	Yes	No
53	Transformer Area - Substation #5	1952	1,200	6/4/2018	6/4/2018	0	0	Yes	No	Yes	Yes	No
54	Transformer Area - Substation #13	1952	1,200	6/4/2018	6/4/2018	0	0	Yes	Yes	Yes	Yes	No
55	Transformer Area - Substation #9	1952	1,868	6/4/2018	6/4/2018	0	0	Yes	No	Yes	No	No
56	Transformer Area - Substation #7	1952	600	6/4/2018	6/4/2018	0	0	Yes	No	Yes	Yes	No
57	Transformer Area - Substation #12	1952	600	6/4/2018	6/4/2018	0	0	Yes	Yes	Yes	Yes	No
58	Transformer Area - Substation #8	1952	600	6/5/2018	6/5/2018	0	0	Yes	No	Yes	Yes	No
59	Transformer Area - Substation #6	1952	600	6/5/2018	6/5/2018	0	0	Yes	No	Yes	Yes	No
60	Transformer Area - Substation #11	1952	564	7/10/2018	7/10/2018	0	0	Yes	No	Yes	No	No
61	Cooling Tower Control House	1952	300	6/11/2018	6/18/2018	15	6	Yes	No	Yes	Yes	No
73	Tuff Shed	Unknown	455	7/19/2018	7/19/2018	6	0	No	NA	NA	NA	No
74	Compressor House, Propane Storage Area	1951	1,240	6/8/2018	6/8/2018	12	0	Yes	No	Yes	No	No
75	Propane Storage Area	1952	83,400	6/8/2018	6/8/2018	9	0	Yes	No	Yes	No	No
76	Fuel Oil Storage Area, Water Tanks (2)	1951	1,600	6/5/2018	6/5/2018	21	0	No	NA	NA	NA	No
77	Sulfuric Acid and Caustic Soda Storage	1952	1,591	6/6/2018	6/6/2018	3	0	No	NA	NA	NA	No
78	Oil Room Building	1951	1,100	6/20/2018	6/20/2018	33	0	Yes	No	Yes	No	No
79	Scale House	1952	66	6/25/2018	6/25/2018	3	0	No	NA	NA	NA	No
80	Varnish Stripping Building	1953	2,211	7/5/2018	7/5/2018	36	0	Yes	Yes	Yes	Yes	No
81	Production Line	1953	11,001	7/10/2018	7/10/2018	33	0	Yes	Yes	Yes	Yes	No
82	Tocco Generator & Emergency Gen #9	1953	1,638	7/10/2018	7/19/2018	18	0	Yes	No	Yes	Yes	No
83	Plating Rack Repair Area	1951	714	6/13/2018	6/13/2018	24	0	Yes	No	Yes	No	No
84	Loading Dock with Canopy	1951	764	7/5/2018	7/6/2018	9	0	No	NA	NA	NA	No
85	Transformer Oil Pump Building	1951	169	6/6/2018	6/6/2018	18	0	Yes	No	Yes	No	No
87	Storage Building	1951	270	6/28/2018	6/28/2018	21	0	Yes	No	Yes	No	No
95	Transformer Area - Substation #1	1951	280	6/4/2018	6/4/2018	0	0	Yes	No	Yes	No	No
96	Transformer Area - Substation #2	1952	540	6/4/2018	6/4/2018	0	0	Yes	No	Yes	Yes	No
97	Transformer Area - Substation #3	1952	1,050	6/4/2018	6/4/2018	0	0	Yes	No	Yes	Yes	No
98	Transformer Area - Substation #4	1953	400	6/5/2018	6/5/2018	0	0	Yes	No	Yes	Yes	No
99	Transformer Area - Substation #14	1953	600	6/4/2018	6/4/2018	0	0	Yes	No	Yes	Yes	No
100	Transformer Area - Substation #15	1952	600	6/5/2018	6/5/2018	0	0	No	NA	NA	NA	No
101	Transformer Area - Substation Spare	1953	600	6/4/2018	6/4/2018	0	0	Yes	No	Yes	Yes	No
102	Water Well #1	1951	64	6/6/2018	6/6/2018	24	0	Yes	No	Yes	No	No

Table 1. Asbestos Inventory Summary

Building No.	Name	Year Built	Area (ft ²)	Survey Dates		Number of Samples		Asbestos?	Friable?	Non-Friable?	Damaged ACM?	Asbestos Debris?
				Begin	End	Asbestos PLM	Asbestos Point Count					
106	Water Well #5	1951	199	6/8/2018	6/8/2018	18	0	Yes	No	Yes	Yes	No
107	Covered Passage	1951	178	7/6/2018	7/6/2018	33	0	Yes	No	Yes	Yes	No
108	Main Transformer Substation #1	1951	8,050	6/4/2018	6/4/2018	0	0	Yes	No	Yes	Yes	No
109	Main Transformer Substation #2 and 3	1951	9,650	6/4/2018	6/4/2018	0	0	Yes	No	Yes	No	No
109A	Transformer Substation	Unknown	900	6/4/2018	6/4/2018	0	0	Yes	No	Yes	No	No
110	Terminal House	1951	270	6/4/2018	6/4/2018	0	0	Yes	No	Yes	No	No
114	Tank Water Storage 100,000 Gallons	1951	NA	6/6/2018	6/6/2018	3	0	No	NA	NA	NA	No
117	Cooling Tower, Main Plant	1952	NA	6/11/2018	6/11/2018	0	0	Yes	NA	NA	NA	No
120	Former Steam Plant & Emergency Generator #10	1953	58,066	6/25/2018	6/25/2018	100	6	Yes	Yes	Yes	Yes	Yes
120H	Addition to Building 120	2006	28,000	6/22/2018	6/22/2018	24	0	Yes	No	Yes	No	No
121	Loading Dock, Steel Plant	1953	420	6/25/2018	6/25/2018	3	0	Yes	NA	NA	NA	No
122	Crane Runway and Steel Storage Area	1953	18,332	6/25/2018	6/25/2018	3	0	Yes	No	Yes	No	No
125	Unloading Station No. 1 Propane	1951	8	6/8/2018	6/8/2018	6	0	Yes	No	Yes	No	No
126	Unloading Station No. 2 Propane	1951	48	6/8/2018	6/8/2018	9	0	Yes	No	Yes	Yes	No
127	Storage Sewage Disposal Plant	1951	160	7/19/2018	7/19/2018	6	0	Yes	No	Yes	No	No
130	Garage	1954	2,280	6/27/2018	6/25/2018	6	0	No	NA	NA	NA	No
131	Process Water Tank & System	1953	441	6/12/2018	6/12/2018	18	0	Yes	No	Yes	No	No
133	Aisleway from Building 10 to Line 7	1951	183	6/27/2018	6/28/2018	24	0	Yes	No	Yes	No	No
134	Restroom at Line 7	1953	82	7/6/2018	7/6/2018	36	2	Yes	No	Yes	No	No
135	Storm Drain Station	1953	108	6/7/2018	6/7/2018	6	0	No	NA	NA	NA	No
137	Pump House - Sprinkler System	1956	400	6/11/2018	6/11/2018	24	0	Yes	No	Yes	No	No
138	Transformer Substation No. 16	1956	120	6/7/2018	6/7/2018	0	0	Yes	No	Yes	No	No
139	Tank Water Storage 1,000,000 Gallons	1952	2,739	6/11/2018	6/11/2018	6	0	Yes	No	Yes	No	No
145	Transformer Substation #17	1967	1,321	6/4/2018	6/4/2018	0	0	Yes	Yes	Yes	Yes	No
146	Transformer Substation #18	1967	406	6/4/2018	6/4/2018	0	0	Yes	No	Yes	Yes	No
147	Transformer Substation #19	1967	960	6/13/2018	7/19/2018	15	0	Yes	No	Yes	No	No
148	Cooling Tower Building 13	1966	368	6/6/2018	6/6/2018	9	0	Yes	No	Yes	No	No
150	Compressor Air	1969	150	6/6/2018	6/6/2018	12	0	Yes	No	Yes	No	No
151	Compressor Air	1969	150	6/28/2018	6/28/2018	9	0	Yes	No	Yes	No	No
152	Motor Generator Housing	1967	636	6/28/2018	6/28/2018	3	0	Yes	No	Yes	Yes	No
154	Compressor Air	1969	168	6/13/2018	6/13/2018	9	0	Yes	No	Yes	No	No
155	Compressor Air	1969	150	6/11/2018	6/11/2018	12	0	Yes	No	Yes	Yes	Yes
156	Production Building - Heat Treat	1970	5,286	6/18/2018	6/18/2018	69	0	Yes	No	Yes	Yes	No
157	Compressor Air	1969	725	6/12/2018	6/12/2018	15	0	Yes	No	Yes	No	No
158	Water Well #6	1969	240	6/11/2018	6/11/2016	30	0	Yes	No	Yes	No	No
159	Sandblast Building	1972	144	6/5/2018	6/5/2018	6	0	Yes	No	Yes	No	No
160	Covered Storage Building	1969	21,033	7/16/2018	7/16/2018	12	0	Yes	No	Yes	No	No
162	Autodin A.B. Terminal Building	1971	1,036	6/12/2018	6/12/2018	48	2	Yes	No	Yes	Yes	No
163	Incinerator	1971	27	6/6/2018	6/6/2018	9	0	Yes	No	Yes	No	No
164	Paint Pumping Building	1974	506	7/11/2018	7/11/2018	3	0	No	NA	NA	NA	No

Table 1. Asbestos Inventory Summary

Building No.	Name	Year Built	Area (ft ²)	Survey Dates		Number of Samples		Asbestos?	Friable?	Non-Friable?	Damaged ACM?	Asbestos Debris?
				Begin	End	Asbestos PLM	Asbestos Point Count					
165	Shed, Former Pesticide Storage	1975	196	6/6/2018	6/6/2018	12	0	Yes	No	Yes	Yes	No
166	Paint Pumping Building	1976	480	6/21/2018	6/21/2018	6	0	Yes	No	Yes	No	No
168	Security Lighting Emergency Generator	1978	176	6/7/2018	6/7/2018	0	0	Yes	No	Yes	No	No
169	Paint Spraying Facility	1978	800	6/8/2018	6/8/2018	12	0	Yes	No	Yes	No	No
170	Pesticide Facility	1978	600	6/7/2018	6/7/2018	12	0	Yes	No	Yes	No	No
171	Austemper Facility - Furnace Room	1978	5,376	6/12/2018	7/19/2018	33	0	Yes	No	Yes	No	No
172	Former Fire Department	1982	3,600	6/26/2018	6/26/2018	74	2	Yes	No	Yes	No	No
173	Environmental Test Facility	1982	992	6/7/2018	6/7/2018	51	0	Yes	No	Yes	No	No
175	Generator Building	1984	187	6/12/2018	6/12/2018	6	0	Yes	No	Yes	No	No
176	Switching Station	1985	90	7/19/2018	7/19/2018	0	0	Yes	NA	NA	NA	No
177	Equipment Wash Facility	1985	1,440	6/7/2018	6/7/2018	6	0	No	NA	NA	NA	No
178	Lubrication System Facility	1985	389	6/6/2018	6/6/2018	15	0	Yes	Yes	Yes	Yes	No
180	Chrome Reduction Facility	1991	576	7/6/2018	7/6/2018	12	0	No	NA	NA	NA	No
181	Phosphate Facility	1992	4,000	6/12/2018	6/12/2018	21	0	Yes	No	Yes	No	No
182	Groundwater Treatment Facility	1992	10,000	7/11/2018	7/11/2018	33	0	Yes	No	Yes	No	No
184	Flammable Storage Warehouse	1992	144	7/19/2018	7/19/2018	6	0	No	NA	NA	NA	No
185	Air Compressor Building	1994	104	6/5/2018	6/5/2018	9	0	No	NA	NA	NA	No
187	Haz-Bin Storage Containment Structure	1995	172	7/19/2018	7/19/2018	9	0	No	NA	NA	NA	No
188	Haz-Bin Storage Containment Structure	1995	172	7/19/2018	7/19/2018	9	0	No	NA	NA	NA	No
192	US Army Commander's Representative Office	Unknown	968	7/19/2018	7/19/2018	27	0	No	NA	NA	NA	No

Notes:ft²: square feet

PLM: Polarized Light Microscopy

ACM: asbestos containing material (asbestos >1.0%)

NA: not applicable

Appendix C

Table 1 from LBP Inspection Report: LBP Inventory Summary

Table 1. Lead-Based Paint Inventory Summary

Building No.	Name	Year Built	Area (ft ²)	Survey Dates		Number of Lead Bulk Samples	Lead-Based Paint?	Damaged?
				Begin	End			
1	Former Production Line Area	1951	34,201	7/11/2018	7/12/2018	9	Yes	Yes
2	Former Production Line Area	1951	34,201	7/12/2018	7/12/2018	9	Yes	Yes
3	Former Production Line Area	1951	34,201	7/13/2018	7/13/2018	9	Yes	Yes
4	Former Production Line Area	1951	34,201	7/16/2018	7/16/2018	9	Yes	Yes
5	Former Production Line Area	1951	34,201	7/13/2018	7/13/2018	10	Yes	Yes
6	Former Production Line Area	1951	34,201	7/16/2018	7/16/2018	6	Yes	Yes
7	Former Production Line Area	1951	71,622	7/17/2018	7/17/2018	13	Yes	Yes
8	Former Production Line Area	1951	48,225	7/17/2018	7/18/2018	13	Yes	Yes
9	Machine Shop Offices	1951	37,800	7/3/2018	7/4/2018	16	Yes	Yes
10	Crib/Warehouse/Office National Guard	1951	20,338	6/27/2018	6/28/2018	14	Yes	Yes
11	Paint & Oil Storage, Recycling & Transport	1951	12,451	7/3/2018	7/4/2018	12	Yes	Yes
12	Former Boiler House - Now Tenant Occupied	1951	6,240	6/26/2018	6/26/2018	12	Yes	Yes
13	Production Line - Rectifier House	1951	38,000	6/28/2018	6/29/2018	14	Yes	Yes
14	Security Office & Locker Rooms	1951	10,888	7/2/2018	7/2/2018	9	Yes	Yes
15	Transformer Servicing Facility	1951	3,200	6/27/2018	6/27/2018	7	Yes	Yes
16	Office and Gate House	1951	3,740	7/3/2018	7/4/2018	6	Yes	Yes
17	Administrative Office	1951	7,308	7/3/2018	7/4/2018	10	Yes	Yes
18	Cafeteria and Offices	1951	2,819	7/2/2018	7/2/2018	7	Yes	Yes
19	Production Restrooms	1951	501	6/19/2018	6/19/2018	5	Yes	No
20	Empty Barrel Storage	1951	14,800	6/5/2018	6/5/2018	1	Yes	Yes
21	Plant Cafeteria	1951	6,916	7/9/2018	7/9/2018	10	Yes	Yes
22	Aisleway and Office	1951	1,976	6/20/2018	7/9/2018	6	Yes	Yes
23	Aisleway and Office	1951	2,652	6/20/2018	6/20/2018	5	Yes	Yes
24	Aisleway and Gage Laboratory	1952	1,976	7/9/2018	7/9/2018	8	Yes	Yes
25	Aisleway and Accounting Storage Area	1952	2,652	6/13/2018	6/19/2018	5	Yes	Yes
26	Aisleway and Instrument Storage Area	1951	1,976	6/18/2018	6/18/2018	10	Yes	Yes
27	Restroom and Passage	1951	1,053	7/9/2018	7/9/2018	6	Yes	Yes
28	Restroom and Passage	1951	1,053	7/9/2018	7/9/2018	7	Yes	Yes
29	Restroom	1951	1,053	6/19/2019	6/19/2019	7	Yes	No
30	Restroom and Passage	1951	1,053	6/13/2018	6/20/2018	9	Yes	Yes
31	Restroom and Passage	1951	1,053	6/20/2018	6/20/2018	5	Yes	Yes
32	Restroom and Passage	1951	1,053	7/5/2018	7/5/2018	7	Yes	Yes
33	Passage and Distribution PNL	1951	1,520	6/21/2018	6/21/2018	7	Yes	Yes
34	Passage and Office	1952	1,539	7/5/2018	7/6/2018	8	Yes	Yes
35	Passage and Emergency Generator #7	1952	1,539	7/5/2018	7/6/2018	8	Yes	Yes
36	Passage	1952	1,053	6/21/2018	6/21/2018	7	Yes	Yes
37	Passage and Office	1952	1,539	7/5/2018	7/6/2018	8	Yes	Yes
38	Passage	1951	1,539	6/21/2018	6/21/2018	7	Yes	Yes
39	Central Salvage Area	1952	2,112	7/5/2018	7/6/2018	8	Yes	Yes
43	Acid Neutralization/Cyanide Lab	1952	1,558	6/6/2018	6/6/2018	3	Yes	Yes

Table 1. Lead-Based Paint Inventory Summary

Building No.	Name	Year Built	Area (ft ²)	Survey Dates		Number of Lead Bulk Samples	Lead-Based Paint?	Damaged?
				Begin	End			
44	Acid Neutralization/Cyanide Destruction	1952	12,240	6/7/2018	6/7/2018	4	Yes	Yes
45	Production Line	1952	7,293	7/10/2018	7/18/2018	6	Yes	Yes
46	Production Line	1952	8,200	7/10/2018	7/18/2018	7	Yes	Yes
47	Production Line and Emergency Gen #2	1952	8,360	7/10/2018	7/18/2018	9	Yes	Yes
48	Production Line and Office	1952	8,400	7/10/2018	7/18/2018	6	Yes	Yes
49	Production Line and Emergency Gen #4/5	1952	10,548	7/11/2018	7/18/2018	10	Yes	Yes
50	Production Line and Emergency Gen #6	1952	10,420	7/11/2018	7/18/2018	6	Yes	Yes
51	Laboratory Chemical and Metallurgical	1952	3,800	6/19/2018	6/19/2018	9	Yes	Yes
52	Transformer Area - Substation #10	1951	700	6/4/2018	6/4/2018	0	Yes	Yes
53	Transformer Area - Substation #5	1952	1,200	6/4/2018	6/4/2018	0	Yes	Yes
54	Transformer Area - Substation #13	1952	1,200	6/4/2018	6/4/2018	0	Yes	Yes
55	Transformer Area - Substation #9	1952	1,868	6/4/2018	6/4/2018	0	Yes	No
56	Transformer Area - Substation #7	1952	600	6/4/2018	6/4/2018	0	Yes	No
57	Transformer Area - Substation #12	1952	600	6/4/2018	6/4/2018	0	Yes	No
58	Transformer Area - Substation #8	1952	600	6/5/2018	6/5/2018	0	Yes	Yes
59	Transformer Area - Substation #6	1952	600	6/5/2018	6/5/2018	0	Yes	Yes
60	Transformer Area - Substation #11	1952	564	7/10/2018	7/10/2018	0	Yes	No
61	Cooling Tower Control House	1952	300	6/11/2018	6/18/2018	4	Yes	Yes
73	Tuff Shed	Unknown	455	7/19/2018	7/19/2018	3	No	NA
74	Compressor House, Propane Storage Area	1951	1,240	6/8/2018	6/8/2018	3	No	NA
75	Propane Storage Area	1952	83,400	6/8/2018	6/8/2018	2	Yes	Yes
76	Fuel Oil Storage Area, Water Tanks (2)	1951	1,600	6/5/2018	6/5/2018	4	No	NA
77	Sulfuric Acid and Caustic Soda Storage	1952	1,591	6/6/2018	6/6/2018	0	No	NA
78	Oil Room Building	1951	1,100	6/20/2018	6/20/2018	6	Yes	Yes
79	Scale House	1952	66	6/25/2018	6/25/2018	3	Yes	Yes
80	Varnish Stripping Building	1953	2,211	7/5/2018	7/5/2018	10	Yes	Yes
81	Production Line	1953	11,001	7/10/2018	7/10/2018	9	Yes	Yes
82	Tocco Generator & Emergency Gen #9	1953	1,638	7/10/2018	7/19/2018	7	Yes	Yes
83	Plating Rack Repair Area	1951	714	6/13/2018	6/13/2018	5	Yes	Yes
84	Loading Dock with Canopy	1951	764	7/5/2018	7/6/2018	3	Yes	Yes
85	Transformer Oil Pump Building	1951	169	6/6/2018	6/6/2018	2	Yes	Yes
87	Storage Building	1951	270	6/28/2018	6/28/2018	1	Yes	Yes
95	Transformer Area - Substation #1	1951	280	6/4/2018	6/4/2018	0	Yes	No
96	Transformer Area - Substation #2	1952	540	6/4/2018	6/4/2018	0	Yes	Yes
97	Transformer Area - Substation #3	1952	1,050	6/4/2018	6/4/2018	0	Yes	No
98	Transformer Area - Substation #4	1953	400	6/5/2018	6/5/2018	0	Yes	Yes
99	Transformer Area - Substation #14	1953	600	6/4/2018	6/4/2018	0	Yes	No
100	Transformer Area - Substation #15	1952	600	6/5/2018	6/5/2018	0	No	NA
101	Transformer Area - Substation Spare	1953	600	6/4/2018	6/4/2018	0	Yes	Yes
102	Water Well #1	1951	64	6/6/2018	6/6/2018	5	Yes	Yes

Table 1. Lead-Based Paint Inventory Summary

Building No.	Name	Year Built	Area (ft ²)	Survey Dates		Number of Lead Bulk Samples	Lead-Based Paint?	Damaged?
				Begin	End			
106	Water Well #5	1951	199	6/8/2018	6/8/2018	5	Yes	Yes
107	Covered Passage	1951	178	7/6/2018	7/6/2018	9	Yes	Yes
108	Main Transformer Substation #1	1951	8,050	6/4/2018	6/4/2018	0	Yes	Yes
109	Main Transformer Substation #2 and 3	1951	9,650	6/4/2018	6/4/2018	0	No	NA
109A	Transformer Substation	Unknown	900	6/4/2018	6/4/2018	0	No	NA
110	Terminal House	1951	270	6/4/2018	6/4/2018	0	Yes	Yes
114	Tank Water Storage 100,000 Gallons	1951	NA	6/6/2018	6/6/2018	1	Yes	Yes
117	Cooling Tower, Main Plant	1952	NA	6/11/2018	6/11/2018	0	No	NA
120	Former Steam Plant & Emergency Generator #10	1953	58,066	6/25/2018	6/25/2018	19	Yes	Yes
120H	Addition to Building 120	2006	28,000	6/22/2018	6/22/2018	7	No	NA
121	Loading Dock, Steel Plant	1953	420	6/25/2018	6/25/2018	2	Yes	Yes
122	Crane Runway and Steel Storage Area	1953	18,332	6/25/2018	6/25/2018	3	No	NA
125	Unloading Station No. 1 Propane	1951	8	6/8/2018	6/8/2018	4	Yes	Yes
126	Unloading Station No. 2 Propane	1951	48	6/8/2018	6/8/2018	4	Yes	Yes
127	Storage Sewage Disposal Plant	1951	160	7/19/2018	7/19/2018	1	No	NA
130	Garage	1954	2,280	6/27/2018	6/25/2018	4	Yes	Yes
131	Process Water Tank & System	1953	441	6/12/2018	6/12/2018	4	Yes	Yes
133	Aisleway from Building 10 to Line 7	1951	183	6/27/2018	6/28/2018	10	Yes	Yes
134	Restroom at Line 7	1953	82	7/6/2018	7/6/2018	5	Yes	No
135	Storm Drain Station	1953	108	6/7/2018	6/7/2018	3	Yes	Yes
137	Pump House - Sprinkler System	1956	400	6/11/2018	6/11/2018	3	Yes	Yes
138	Transformer Substation No. 16	1956	120	6/7/2018	6/7/2018	0	Yes	No
139	Tank Water Storage 1,000,000 Gallons	1952	2,739	6/11/2018	6/11/2018	4	Yes	Yes
145	Transformer Substation #17	1967	1,321	6/4/2018	6/4/2018	0	Yes	Yes
146	Transformer Substation #18	1967	406	6/4/2018	6/4/2018	0	Yes	Yes
147	Transformer Substation #19	1967	960	6/13/2018	7/19/2018	4	Yes	Yes
148	Cooling Tower Building 13	1966	368	6/6/2018	6/6/2018	4	Yes	Yes
150	Compressor Air	1969	150	6/6/2018	6/6/2018	3	Yes	Yes
151	Compressor Air	1969	150	6/28/2018	6/28/2018	4	Yes	Yes
152	Motor Generator Housing	1967	636	6/28/2018	6/28/2018	4	Yes	Yes
154	Compressor Air	1969	168	6/13/2018	6/13/2018	4	Yes	No
155	Compressor Air	1969	150	6/11/2018	6/11/2018	3	Yes	No
156	Production Building - Heat Treat	1970	5,286	6/18/2018	6/18/2018	10	Yes	Yes
157	Compressor Air	1969	725	6/12/2018	6/12/2018	6	Yes	Yes
158	Water Well #6	1969	240	6/11/2018	6/11/2016	4	Yes	No
159	Sandblast Building	1972	144	6/5/2018	6/5/2018	0	No	NA
160	Covered Storage Building	1969	21,033	7/16/2018	7/16/2018	5	Yes	Yes
162	Autodin A.B. Terminal Building	1971	1,036	6/12/2018	6/12/2018	3	Yes	Yes
163	Incinerator	1971	27	6/6/2018	6/6/2018	1	No	NA
164	Paint Pumping Building	1974	506	7/11/2018	7/11/2018	3	No	NA

Table 1. Lead-Based Paint Inventory Summary

Building No.	Name	Year Built	Area (ft ²)	Survey Dates		Number of Lead Bulk Samples	Lead-Based Paint?	Damaged?
				Begin	End			
165	Shed, Former Pesticide Storage	1975	196	6/6/2018	6/6/2018	2	No	NA
166	Paint Pumping Building	1976	480	6/21/2018	6/21/2018	7	Yes	Yes
168	Security Lighting Emergency Generator	1978	176	6/7/2018	6/7/2018	5	Yes	Yes
169	Paint Spraying Facility	1978	800	6/8/2018	6/8/2018	4	No	NA
170	Pesticide Facility	1978	600	6/7/2018	6/7/2018	4	Yes	No
171	Austemper Facility - Furnace Room	1978	5,376	6/12/2018	7/19/2018	7	Yes	Yes
172	Former Fire Department	1982	3,600	6/26/2018	6/26/2018	5	No	NA
173	Environmental Test Facility	1982	992	6/7/2018	6/7/2018	6	Yes	No
175	Generator Building	1984	187	6/12/2018	6/12/2018	1	No	NA
176	Switching Station	1985	90	7/19/2018	7/19/2018	0	No	NA
177	Equipment Wash Facility	1985	1,440	6/7/2018	6/7/2018	0	No	NA
178	Lubrication System Facility	1985	389	6/6/2018	6/6/2018	7	Yes	No
180	Chrome Reduction Facility	1991	576	7/6/2018	7/6/2018	3	No	NA
181	Phosphate Facility	1992	4,000	6/12/2018	6/12/2018	11	Yes	Yes
182	Groundwater Treatment Facility	1992	10,000	7/11/2018	7/11/2018	10	Yes	No
184	Flammable Storage Warehouse	1992	144	7/19/2018	7/19/2018	1	No	NA
185	Air Compressor Building	1994	104	6/5/2018	6/5/2018	2	No	NA
187	Haz-Bin Storage Containment Structure	1995	172	7/19/2018	7/19/2018	2	No	NA
188	Haz-Bin Storage Containment Structure	1995	172	7/19/2018	7/19/2018	2	No	NA
192	US Army Commander's Representative Office	Unknown	968	7/19/2018	7/19/2018	3	No	NA

Notes:ft²: square feet

NA: not applicable

Notification of Hazardous Storage, Release, or Disposal

Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
	AOC 5, Former Windrowed Area	Contamination in soil	No waste was stored in this area. NFA status concurrence received from DTSC in June 1996 (as detailed in the April 15, 1996, Revision 2 of the RFI Phase 1 Work Plan - CH2M HILL, 2002).
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD ¹ . See RBAAP-03 (ECP Study Section 3) for updates.
	North Utilities	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	RBAAP-04/SWMU12, IWTP Effluent Sewer Line Break	Contamination in soils	1994 ROD documented NFA required. DTSC concurred with NFA status (October 30, 1995, version of the RFI Phase 1 Work Plan) and ROD.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
42	Sanitary Wastewater Settling Ponds/Sludge Beds (RBAAP-10/SWMU 22)	Contamination in soil	Sampling completed in 1991. The site wide ROD (USAEC, 1994) documented NFA for this site. Based on concerns raised about potential data gaps, the Army is evaluating additional investigation at this site.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

Lease No. DACA05-1-21-508
Exhibit F-1
Notification of Hazardous Storage, Release, or Disposal

Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
42	Building 42, Sewage Disposal Plant	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	West Open Storage	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	Open Land	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	Open Land	No contamination	No known releases.
	North Railroad area	No contamination	No known releases.
	Open Space	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	Open Space	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is above the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	Percolation/Evaporation Ponds (E/P)	PCBs, Metals and TPH in soil	The ROD documented zinc-contaminated soil. This removal action and concluded that no further action was necessary at the ponds (USAEC, 1994).

Lease No. DACA05-1-21-508
Exhibit F-1
Notification of Hazardous Storage, Release, or Disposal

Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
	Ponds) (RBAAP-11/ SWMU 23)		<p>This area continues to be used for discharge of treated water related to RBAAP-03 and is regulated under WDRs. The WDRs require ongoing groundwater monitoring at the E/P Ponds. See RBAAP-03 (ECP Study Section 3) for updates.</p> <p>This site was investigated for PCBs in the Galbestos investigation. None of the sediment samples in the E/P ponds contained PCBs exceeding the TSCA criteria (USACE, 2011).</p> <p>In 2019 a risk assessment was finalized to document that there is no risk to human health, but the regulatory agencies have raised additional concerns. A screening level ecological risk assessment is planned for FY26.</p>
	AOC 10, Former Solid Waste Pile (Southeast Corner)	PCBs in soil	Investigations determined PCB contamination was present in the soil in this area. PCB soil remediation actions are completed. Awaiting final documentation.
	South Open Storage	PCBs in soil	Investigations determined PCB contamination was present in the soil. PCB soil remediation actions are completed. Awaiting final documentation.
	South Parking (Remainder of Parcel 1)	PCBs in soil	Investigations determined PCB contamination was present in the soil. PCB soil remediation actions are completed. Awaiting final documentation.
	South Parking	PCBs in soil	Investigations determined PCB contamination was present in the soil. PCB soil remediation actions are completed. Awaiting final documentation.
	South Parking (remainder of Parcel 1A)	PCBs in soil	Investigations determined PCB contamination was present in the soil. PCB soil remediation actions are completed. Awaiting final documentation.
		Chromium groundwater	This area is within the chromium contaminated groundwater plume. Data from the 3rd Quarter 2020 and subsequent sampling indicate that the groundwater on the

Lease No. DACA05-1-21-508
Exhibit F-1
Notification of Hazardous Storage, Release, or Disposal

Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
		contamination from IRP Site RBAAP-03	northeast corner of this parcel is above the ROD action levels. The groundwater contours indicate that groundwater within this parcel is above ROD action levels.
NW of Railroad	Wood Debris Pile (Northwest corner of railroad tracks)	Contamination in soil	During the site reconnaissance, a debris pile was observed. The debris appears to be treated railroad ties. Railroad ties were removed from the site.
	PCB Contamination Area south of Building 6	PCBs in soils	Due to deteriorated Galbestos panels, the soils to the area south of Building 6 was found to have elevated PCBs within the soil. A TCRA was completed and approved in 2018. The removal actions were completed in 2017.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	Plastic Waste South of Building 6	PCB in waste	A large stockpile of plastic waste has been stored south of Building 6 on a concrete slab. The plastic was characterized and properly disposed of in 2023. Sampling of the concrete below the waste indicated the risk are below RSLs. This area will be closed out in the planned Parcel A ROD.
Landfill	RBAAP-01, Landfill SWMU 10, Landfill (Southern Portion) SWMU 11, Landfill (Northern Portion)	Cyanide and chromium groundwater contamination	The landfill was investigated during the RI/FS (completed in 1993). The RI concluded that it was a major source of cyanide and a minor source of chromium contamination to the groundwater. The landfill underwent formal closure in 1996 and received formal "Construction Complete" certification on October 30, 1995. There are land use controls in place to maintain the cap and conduct groundwater monitoring as required by the 1994 site-wide ROD. Groundwater continues to be monitored. All cyanide results are below ROD levels but lowered hexavalent chromium levels and some total chromium levels are above MCLs in the northern portion of the landfill at MW-65 and 124 A'.

Notification of Hazardous Storage, Release, or Disposal

Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
161	RBAAP-02, Waste Salt Disposal Pit (Located near Building 161)	Contamination in soil	NFA determination documented in 1994 Site Wide ROD.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	RBAAP-03, Groundwater Contamination	Chromium groundwater contamination	<p>ROD signed in 1994 developed the remedial goals for this groundwater contamination.</p> <p>This remains a Category 5 due to the ongoing pump and treat system, and as well the in-situ injections. Groundwater monitoring wells have been abandoned in accordance with the approved groundwater plan from 2017. The rebound study began in April 2020. The tracer study began in 2021 and continues along with groundwater monitoring. Additional in-situ treatment activities are underway.</p>
13	RBAAP-05 - Building 13, Chromium Pretreatment	Contaminants in soil	<p>RBAAP-05: NFA status documented in site wide ROD.</p> <p>RBAAP-07/AOC-7: NFA status documented in letter from DTSC dated June 5, 1996, and is detailed in the April 15, 1996, Revision 2 of the RFI phase I Work Plan. PA/SI completed for this area in May 2018. No further action.</p>
	RBAAP -07/AOC-7 Phosphate Spill SWMU 5 Chromium Reduction Unit (Building 13)	Chromium groundwater contamination from IRP Site RBAAP-03	ECP Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).

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	RBAAP-06, IWTP H ₂ SO ₄ Spill	Sulfuric Acid in soil	<p>This spill was given NFA Status based on investigative results. Documented in closure certifications.</p> <p>The locations within SWMU 1 boundary. The required remediation actions at SWMU 1 (IWTP) were completed in 2015.</p>
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going but levels in the area are no longer above the MCL. See RBAAP-03 for updates.
135	RBAAP-08/ SWMU 21 Southeast Storm Reservoir and Storm drain basin	Chromium and cyanide in soils	NFA status of chromium and cyanide in soils documented in 1994 Site Wide ROD.
		PCBs in soils	This area collects storm water runoff from the facility. After soils and storm water conveyance system was cleaned, this area was sampled and remediated as necessary and in accordance with the TCRA. Pending final documentation.
135	AOC 16, Substation 5	PCBs in soil	Soil contaminated with PCBs (Arochlor-1260) at concentrations greater than IPRGs has been successfully removed from the gravel and soil areas surrounding Substation 5 and the storm water discharge basin. Confirmation samples collected in 2003 from the excavation were non-detect. Excavated soils were disposed of properly. A ROD to properly document these actions and decisions will be completed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
127	RBAAP-09, Northwest Storm	Chromium and cyanide in soils	NFA documented in 1994 Site Wide ROD.

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	Reservoir/ SWMU 20, Northwest Storm Reservoir	PCBs in soils	This area collects storm water runoff from the facility. After soils and storm water conveyance system is cleaned, the area was remediated under a TCRA and impacted soils removed.
	RBAAP-001-R-01, Former Pistol Range	Metals in soil	NFA based on the results of the 2008 SI changed to Category 1. The area was remediated under a TCRA and impacted soils removed.
		PCBs in soils	This area is adjacent to the storm water reservoir ponds which collected runoff from the facility. After soils and storm water conveyance system was cleaned, this area was sampled and remediated as necessary and in accordance with the TCRA.
IWTP Area	SWMU 1, Industrial Wastewater Treatment Plant (IWTP)	RCRA Permit Closure	Originally, Category 7 based on location within SWMU 1 boundary. The required remediation actions at SWMU 1 (IWTP) were completed in 2015/2016. Closure granted from DTSC in August 2016. See closure reports.
	SWMU 4	Galbestos Panels	Building 43 was identified to have Galbestos panels. The panels have been removed.
	SWMU 7 SWMU 8 SWMU 19	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded Chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
174	SWMU 2, Hazardous Waste Storage Area (Drum Storage Facility)	RCRA Permit Closure	Site is the subject of the Closure Certification Report Hazardous Waste Management Unit #3 Chromium Reduction Unit – Batch Process RCRA Hazardous Waste Facility Permit Closure, RBAAP, 2013. Required actions completed in 2015/2016. DTSC granted closure in August 2016.
		Chromium groundwater	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going but are no longer above the MCL. See RBAAP-03 for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
		contamination from IRP Site RBAAP-03	
20	SWMU 3, Empty Drum Storage Area (Railroad Car Off-Loading Area)	VOCs and metals in soil	Investigated during RI as potential source area. Soil and soil gas samples collected. No metals above background in soil samples. Soil gas results area unlikely source of VOC contamination. NFA documented in 1994 site wide ROD.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past but are no longer above the MCL. Groundwater remediation is on-going. See RBAAP-03 for updates.
1	SWMU 6, Chromium Reduction Unit (Building 1)	RCRA permit closure	Site closed under RCRA permit. See closure reports. NFA.
		Galbestos Panels	Building 1 was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
177	SWMU 9, Equipment Wash Facility (Building 177 Triple Rinse Area)	RCRA permit closure	Site closed under RCRA permit. See closure reports. NFA.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
123		Contamination in soils	No reported releases. PA/SI completed for this area in May 2018. NFA.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
	SWMU 13, Incinerator (Building 123)	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
163	SWMU 14, Incinerator (Building 163)/ Incinerator	Contamination in soils	No reported releases. PA/SI completed for this area in May 2018. NFA.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
11	SWMU 15, Pesticide Storage Area (West of Building 11)	Pesticides in soils	PA/SI completed for this area in May 2018. NFA.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
165	SWMU 16, Pesticide Storage Area (Building 165)	Pesticides in soils	Samples previously collected indicate that no contamination was detected above residential levels. PA/SI completed for this area in May 2018. NFA.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
170	SWMU 17, Pesticide Storage	Pesticides in soils	Concrete sump removed and chlordane contaminated soil remediated in 1994 with Stanislaus County Environmental Resources Department oversight. A ROD to properly document these actions and decisions will be completed.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
	Area (Building 170)	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
N/A	SWMU 24, Industrial Waste Pipe Leak	Contamination in soils	Soil excavated to repair the IWPT pipe leak was disposed of offsite. Site investigated as part of the 1991 RI; no contamination detected. Documented in Site Wide 1994 NFA ROD.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1, 2, 3, 4, 5, 6, 7, 12, 15, 77, 137, 170	SWMU 25, Former Underground Storage Tanks 1, 6, 11A, 12, 12A, 12B, 15A, 15B, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37, T77, T137	UST abandonment	Tanks 11A, 24, 25, 26, 27, 28, 29, 30, 31, and 32 were removed or closed in-place. NFA status based on closures.
		Galbestos Panels	Buildings 1, 2, 3, 4, 5, 6, 7, 12 and 15 was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
4	AOC 1, Mortar Line Accumulation Area (Building 4)	Contamination in soil	After closure of unit, the concrete pad that it was on was in good condition. No sampling required. PA/SI completed for this area in May 2018. NFA.
		Galbestos Panels	Building 4 was identified to have Galbestos panels. The panels have been removed.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
9	AOC 2, Machine Shop Accumulation Area (Building 9)	Contamination in soil	After closure of unit, the concrete pad that it was on was in good condition. No sampling required. PA/SI completed for this area in May 2018. NFA.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
15	AOC 3, Vehicle Maintenance Accumulation Area (Building 15)	Contamination in soil	After closure of unit, the concrete pad that it was on was in good condition. No sampling required. PA/SI completed for this area in May 2018. NFA.
		Galbestos Panels	Building 15 was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
N/A	AOC 4, Grenade Line Accumulation Area	Contamination in soil	After closure of unit, the concrete pad that it was on was in good condition. No sampling required. PA/SI completed for this area in May 2018. NFA.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
75	AOC 8A, Horizontal Aboveground Storage Tanks - Propane Storage Tanks	Propane in soils	ASTs were not used for waste. Only propane was stored within the tanks. No further action required.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
85	AOC 8B, Horizontal Aboveground Storage Tanks - Transformer Oil Storage Tanks (including the Transformer Oil Distribution System)	PCBs in soil	ASTs were cleaned and removed. The lines were drained, cleaned and capped (filled with a cement slurry). Known releases. A ROD to properly document these actions and decisions will be completed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
76	AOC 9A, Vertical Aboveground Storage Tanks – Fuel Oil Storage Tanks	AST Removal	ASTs were removed. Prior to removal, the tanks were cleaned and visually inspected. The tanks showed no signs on leaks. NFA status based on investigation results.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
139	AOC 9B, Vertical Aboveground Storage Tanks -	No releases	No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the area of groundwater contamination.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
	Fire Sprinkler Storage Tank		
125, 126	AOC 11A, Loading Racks – Propane Farm Loading/Unloading	Propane in soil	NFA because the physical characteristics of propane would cause it to vaporize if there were a release. There is no potential for soil or groundwater to be contaminated.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
137	AOC 11B, Loading Racks – Fire Sprinkler Pumping Station	POL in soil	Category 2 based on small lens of petroleum contaminated soil remaining beneath Building 137, associated with UST T137.
Prod. Area and IWTP	AOC 12, Industrial Wastewater Collection System	Contamination in soil	Soil investigations involving collection of soil samples from within and adjacent to the sumps and trenches associated with production lines 2, 3, 4 and 5 were completed in accordance with DTSC-approved work plans. Soil samples were collected from both the production line trenches and sumps. The investigations did not identify contaminants at elevated concentrations in the soil samples. A ROD to properly document these actions is in production.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
178	AOC 13, Draw Lube System (Building 178)	POL in soils	In March 1993, during layaway activities in Building 13, contamination was discovered on the south side of Building 178. Thirteen soil samples were collected and elevated oil and grease concentrations were detected at two locations. Soil excavation took place to remove the contamination, an area 6-feet wide by 16-feet

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
			long was excavated immediately adjacent to Building 178. A ROD to properly document these actions and decisions is in development.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded Chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
Prod. Area and IWTP	AOC 14, Zinc-Cyanide Wastewater Collection System	Cyanide in soils	Soil samples previously collected below and near sump 6-11 at depths of 11 to 13 feet did not identify elevated cyanide contaminant concentrations. The soil investigation completed for the portions of the cyanide wastewater collection system near production lines 2 through 5 did not identify any significant elevated concentrations. A ROD to properly document these actions and decisions is in development.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
13	AOC 15, Building 13 Temporary Wastewater Line	Temporary wastewater line	The temporary wastewater line was removed from Building 13 and is capped outside the building. There is no documentation of any spills or releases associated with this unit. PA/SI completed for this area in May 2018. NFA.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
1	Production Line	PCBs in soils	An ESCA was executed to investigate and remove PCBs and Galbestos in the main production buildings located in Parcel A. Remedial actions will be delineated in the forthcoming ROD for Parcel A.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
		Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates
2	Production Line	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
3	Central and Eastern portion of Production Line 3 Sumps: 3-1, 3-2, 3-3, 3-6, 3-7, 3-8, 3-9, 3-10, 3-11	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
3	Western portion of Production Line 3 Sumps: 3-1, 3-2, 3-3, 3-6, 3-7, 3-8, 3-9, 3-10, 3-11	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the western area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
4	Central and Eastern portion of Production Line 4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
	Sumps: 4-1, 4-2, 4-3, 4-4, 4-5, 4-6, 4-7, 4-8, 4-9, 4-10, 4-11	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
4	Western Portion of Production Line 4	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
	Sumps: 4-1, 4-2, 4-3, 4-4, 4-5, 4-6, 4-7, 4-8, 4-9, 4-10, 4-11	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the western area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
5	Central and Eastern portion of Production Line 5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
	Sumps: 5-1, 5-2, 5-3, 5-5, 5-6, 5-8, 5-10, 5-11	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
5	Western portion of Production Line 5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
	Sumps: 5-1, 5-2, 5-3, 5-5, 5-6, 5-8, 5-10, 5-11	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the western area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
6	Production Line	PCBs in soil	An ESCA was executed to investigate and remove PCBs and Galbestos in the main production buildings located in Parcel A. Remedial actions will be delineated in the forthcoming ROD for Parcel A.
		Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Groundwater contamination within the western area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
6	Building 6: Zinc Plater Cyanide Sump	PCBs in soil	An ESCA was executed to investigate and remove PCBs and Galbestos in the main production buildings located in Parcel A. Remedial actions will be delineated in the forthcoming ROD for Parcel A.
		Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Groundwater contamination within the western area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
7	Building 7:	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
	Production Line	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
8	Building 8: Production Line – Press Room	PCBs in soil	An ESCA was executed to investigate and remove PCBs and Galbestos in the main production buildings located in Parcel A. Remedial actions will be delineated in the forthcoming ROD for Parcel A.
	Production Line Sump	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
	4500 Ton Press Pit (Building 8)	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
9	Building 9 - 05Machine Shop/Offices	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
10	Crib/Warehouse/O ffices, Former National Guard	TPH in soil	Samples were collected in 2018 (FOSET Data gap Report). The maximum result for TPH-diesel was 5.7 mg/kg, and the maximum result for TPH as motor oil was 38 mg/kg. All results were below commercial/industrial worker risk screening levels of 600 mg/kg (diesel) and 2,200 mg/kg (motor oil). No action is recommended for this area. Documentation is pending.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
11	Paint and Oil Storage, Oil Recycling and Transport See EBS 1998 (Building 11)	PCBs and TPH in soils	<p>Was originally Category 7 based on soil samples that identified Aroclor-1260 at concentrations ranging from 0.4 mg/kg to 1 mg/kg (above the Industrial PRG of 0.74 mg/kg).</p> <p>Samples were completed in 2018 (FOSET Data gap). There was one area with the PCB concentrations above 1 mg/kg (7.4 mg/kg PCBs). The TPH sample results were less than the commercial/industrial worker risk levels. The recommendation for this area is to excavate soil that has PCB concentrations above 1 mg/kg that is not covered by hardscape. It is recommended to put a land use control on the areas that exceed 1 mg/kg but are currently under hardscape or near railroad tracks. The Uniform Federal Policy QAPP was approved in June 2020 (Weston, 2020). Removal action completed in 2020, and pending final documentation.</p>
		Galbestos Panels	<p>This building was identified to have Galbestos panels. The panels have been removed.</p>
		Chromium groundwater contamination from IRP Site RBAAP-03	<p>This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.</p>
12	Boiler House	TPH, Metals and PCBs in soil	<p>Was previously Category 7 based on soil samples that identified chromium in one sample at a concentration of 144 mg/kg (above the industrial PRG of 64 mg/kg).</p> <p>Samples were collected in 2018 (FOSET Data gap Report). One sample for TPH as diesel exceed the screening criteria, and the averages do not exceed the screening levels. PCBs within this area are above 1 mg/kg PCBs (maximum is 5.2 mg/kg) in two locations (Sample locations B012S02 and B012S04). The average for metals within the soil does not exceed the risk-based screening levels. The recommendation is to excavate the area with PCB contamination above 1 mg/kg PCBs (near sample B012S02), and to place a land use restriction on the area near B012S04 due to the impracticability of excavating the contaminated soil. The</p>

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
			Uniform Federal Policy QAPP was approved in June 2020 (Weston, 2020). Removal action completed in 2020, and pending final documentation.
		Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
13	Production Line	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
14	Dispensary/ Locker Rooms, Security Office	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
16	Offices and Gate House	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
17	Administrative Offices	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
18	Cafeteria and Offices	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
19	Production Restrooms	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
21	Plant Cafeteria	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
22	Aisleway and Office (within Bldg. 160)	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
22A	Training Room (within Bldg. 160) (between Building 1 and 2)	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
2 and 3	Courtyard between Buildings 2 and 3	PCB contamination in concrete	In February 2019, a technical memo detailed all the sampling efforts that have taken place within the courtyard areas. It recommended that concrete with PCB results greater than 0.94 mg/kg PCBs be removed (Weston, 2019). There are six areas that had PCB results above action levels, and they are located between Building 7 and 1, and 1 and 2 need to have concrete removed. This work was integrated into the same work plan as other PCB remediation activities on site. The Uniform Federal Policy QAPP that includes this work was approved in June 2020 (Weston, 2020). It detailed that the areas that needed PCB removal actions would have concrete removed 10 feet by 20 feet, in half inch intervals until the action levels are achieved. The activities were completed in 2020 and are pending final documentation.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
23	Aisle way and Office <i>(between Building 3 and 4)</i>	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates
24	Aisleway and Gage Laboratory <i>(between Building 4 and 5)</i>	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
4 and 5	Courtyard between Buildings 4 and 5	PCB contamination in concrete	In February 2019, a technical memo detailed all the sampling efforts that have taken place within the courtyard areas. It recommended that concrete with PCB results greater than 0.94 mg/kg PCBs be removed (Weston, 2019). There are six areas that had PCB results above action levels, and they are located between Building 7 and 1, 2 and 3 and 4 and 5 need to have concrete removed. This work was integrated into the same work plan as other PCB remediation activities on site. The Uniform Federal Policy QAPP that includes this work was approved in June 2020 (Weston, 2020). It detailed that the areas that needed PCB removal actions would have concrete removed 10 feet by 20 feet, in half inch intervals until the action levels are achieved. The activities were completed in 2020 and are pending final documentation.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
25	Aisleway and Acctg Storage Area (between Building 5 and 6)	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
26	Aisleway and Instrument Storage Area (South of Building 6)	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
27	Restroom and Passage	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
28	Restroom and Passage	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
29	Restroom	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
30	Restroom and Passage	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
31	Restroom and Passage	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
32	Restroom and Passage	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
33	Passage and Distribution PNL – S.S. No. 1 <i>(West passage between Building 7 and 1)</i>	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates
34	Passage and Office <i>(West passage between Buildings 1 and 2)</i>	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
35	Passage and Emerg. Gen No. 7	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
	(West passage between Buildings 2 and 3)	Chromium groundwater contamination from IRP Site RBAAP-03	ECP Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
36	Passage	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed
	(West passage between Buildings 3 and 4)	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3)
37	Passage and Office	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed
	(West passage between Buildings 5 and 6)	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
38	Passage	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
	(West passage between Buildings 6 and 7)	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
39	Central Salvage Area	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
45	Production Line	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
46	Production Line	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
47	Production Line and Emerg. Gen No. 2 (Generator Removed)	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 based on groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation is on-going. See RBAAP-03 (ECP Study Section 3) for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
48	Production Line and Office	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
49	Production Line and Emerg. Gen No. 4 and 5	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
50	Production Line and Emerg. Gen No. 6	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
51	Laboratory, Chemical and Metallurgical	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
52	Transformer Area – Substation No. 10	Chromium groundwater	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
		contamination from IRP Site RBAAP-03	
53	AOC-16; Transformer Area – Substation No. 5	PCBs in soil	Soil contaminated with PCBs (Arochlor-1260) at concentrations greater than IPRGs has been successfully removed from the gravel and soil areas surrounding Substation 5 and the storm water discharge basin. Confirmation samples collected in 2003 from the excavation were non-detect. Excavated soils were disposed of properly. The final RFI recommended NFA for AOC 16b (CH2M HILL 2005a). DTSC concurred by approving the Final RFI Report. ROD to properly capture PCB remediation to be completed. The transformers have been removed from Substation 5.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
54	Transformer Area – Substation No. 13	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
55	Transformer Area – Substation No. 9	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
56	Transformer Area – Substation No. 7	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
57	Transformer Area – Substation No. 12	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
58	Transformer Area – Substation No. 8	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
59	Transformer Area – Substation No. 6	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
60	Transformer Area – Substation No. 11	Galbestos Panels	The building where this substation is located was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
61	Cooling Tower Control House	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
62	Facilities Eng. Store House	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
64	Fuel Oil Unloading Serv. Bldg.	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded Chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
73	Hose Cart House No. 1, Storage	Contaminants in soil	This area is within the boundary of SWMU 1 (IWTP). The required remediation actions at SWMU 1 were completed in 2015/2016.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded Chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
74	Compressor House, Propane Storage. Area	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
75	Propane Storage Area	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
77	Sulfuric Acid and Caustic Soda Storage	Contaminants in soil	This area is within the boundary of SWMU1. The required remediation actions at SWMU 1 (IWTP) were completed in 2015/2016.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
78	Oil Room Building	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
80	Varnish Stripping Building	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
81	Production Line	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
82	Tocco Generator and Emergency Generator No. 9	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
83	Plating Rack Repair Area	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
84	Loading Dock with Canopy	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
85	Transformer Oil Pump Building	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
87	Storage Building	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
95	Transformer Area – Substation No. 1	PCBs in soil	This area was excluded from further sampling, as this area is an active outdoor electrical substation. The area is fenced, secured and marked. Previous soil sample results from 2008 had a maximum concentration of 0.26 mg/kg PCBs. These levels are below any action level. The area will remain secured and marked (Weston, 2018d). The recommendation is to leave this area as an electrical substation and maintain the area as such. This recommendation is pending regulatory concurrence.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
96	Transformer Area – Substation No. 2	PCBs in soil	During the site reconnaissance, western transformer was within this Substation was found to be leaking (weapage). The PCB concentration of the leaking transformer was 3.6 mg/kg PCBs. The transformer was taken offline and the area remediated. Remedial actions will be delineated in the forthcoming ROD for Parcel A.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates
97	Transformer Area – Substation No. 3	TPH and PCBs in soil	Category 6 based on potential for PCBs to have impacted the soil adjacent from two transformers (PCB concentrations of 64 mg/kg and 33 mg/kg). As part of the FOSET Data gap report effort, this area underwent further PCB and TPH analysis to determine the extent of contamination. The maximum concentration for TPH as diesel was 6,600 mg/kg. The PCB concentrations in both the soil and concrete transformer pad were above 1 mg/kg PCBs. This transformer is inactive, and due to the PCB levels above 1 mg/kg PCBs, it was recommended that the remaining equipment be removed, as well as the contaminated soil and concrete pad (Weston, 2018d). The Uniform Federal Policy QAPP was approved in June 2020 (Weston, 2020). Removal action completed in 2020 and is pending final documentation in the Parcel A ROD.
		Chromium groundwater contamination from IRP Site RBAAP-03	The groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates
98	Transformer Area – Substation No. 4	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
99	Transformer Area – Substation No. 14	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
100	Transformer Area – Substation No. 15	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
		PCBs in soil	PCB contaminated soil was discovered in a May 2020 sampling event. Concrete and soil remediation was completed in 2024, and further action will be included in the Parcel A ROD.
101	Transformer Area – Substation Spare	PCBs in soil	In 2018 as part of the FOSET Data gap effort, this area underwent further PCB analysis to determine the extent of PCB contamination. The transformers are no longer present. The concrete was sampled, and the results for PCBs were 6.8 mg/kg. The soil concentrations ranged from 0.074 mg/kg to 1.9 mg/kg PCBs. Because this area is no longer used and has elevated levels of PCBs, it is recommended that the pad and contaminated soil be removed. The Uniform Federal Policy QAPP was approved in June 2020 (Weston, 2020). Removal action completed in 2020, and further action will be included in the Parcel A ROD.
		Chromium groundwater contamination from IRP Site RBAAP-03	The groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
102	Water Well No. 1	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
103	Water Well No. 2	Chromium groundwater contamination from IRP Site RBAAP-03	This is the area of a former potable water well. This well was abandoned. This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
104	Water Well No. 3	Chromium groundwater contamination from IRP Site RBAAP-03	This is the area of a former potable water well. This well was abandoned. Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
105	Water Well No. 4	Well	This is the area of a former potable water well. This well was abandoned.
		PCBs in soil	Originally Category 4 based on location with AOC 8B. ASTs were cleaned and removed. The lines were drained, cleaned and capped (filled with a cement slurry). No known releases. A ROD to properly document these actions and decisions will be completed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCL as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
106	Water Well No. 5	PCBs in soils	This area represents a used potable water well. This is within the area of the PCB- contaminated soils due to deteriorated Galbestos panel. A TCRA was completed and approved in 2018. The removal actions were completed in 2018. Awaiting final documentation.
		Chromium groundwater	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
		contamination from IRP Site RBAAP-03	
107	Covered Passage	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates
108	Main Transformer Subst. No. 1	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
109	Main Transformer Subst. No. 2 and 3	PCBs in soil	Originally a Category 7 based on potential for PCBs to have impacted the soil adjacent from two transformers. Transformers are currently not leaking. Historical dielectric sampling for these transformers indicate that these are non-PCB containing transformers.
		Chromium groundwater contamination from IRP Site RBAAP-03	The groundwater contamination within this area currently exceeds chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
110	Terminal House	PCBs in soil	Originally a Category 4 because of its location within AOC 8B. ASTs were cleaned and removed. The lines were drained, cleaned and capped (filled with a cement slurry). Known releases. A ROD to properly document these actions will be completed.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
114	Tank, Water, Storage, 100,000 Gallons	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
117	Cooling Tower, Main Plant	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
118	Cooling Tower, Boiler House	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
119	Cooling Tower, Steel Plant	Contaminants in soil	Originally Category 7 based on location within SWMU 1 boundary. The required remediation actions at SWMU 1 (IWTP) were completed in 2015.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
120	Steel Plant and Emerg. Gen. No. 10	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

Notification of Hazardous Storage, Release, or Disposal

Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
121	Loading Dock, Steel Plant	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
122	Crane Runway and Steel Storage Area	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
127	Storage Sewage Disposal Plant	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
130	Garage	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
131	Process Water Tank and System	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
133	Aisleway from Bldg. 10 to Line 7	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
134	Restroom at Line 7	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
145	Transformer Substation No. 17	PCBs in Soil	<p>Originally Category 7 based on potential for PCBs to have impacted the soil adjacent from two transformers (PCB concentrations of 28 mg/kg and 134 mg/kg).</p> <p>This area was excluded from further sampling, as this area is an active outdoor electrical substation. The area is fenced, secured and marked. Previous soil sample results from 2008 had a maximum concentration of 9.5 mg/kg PCBs. Although these results are above RSLs, it is below the TSCA action levels. The area will remain secured and marked (Weston, 2018d).</p> <p>During the site reconnaissance in 2019 and then confirmed by the RLRA in 2020, one transformer was within this substation was found to be leaking (weapage). Historical dielectric fluid sampling indicates that easternmost transformer is PCB contaminated, and the other two are non-PCB containing. The transformer pad was double rinse washed. Additional remediation activities will be incorporated into the Final ROD for Parcel A.</p> <p>This area is now ECP Category 5 due to its proximity to the groundwater contamination plume.</p>
		Chromium groundwater contamination from IRP Site RBAAP-03	Groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
146	Transformer Substation No. 18	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
147	Transformer Substation No. 19	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
148	Cooling Tower, Building 13	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
150	Compressor, Air	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
151	Compressor, Air	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
152	Motor Generator Housing	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
154	Compressor, Air	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
155	Compressor, Air	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
156	Production Building – Heat Treat	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
157	Compressor, Air	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
158	Water Well No. 6	Chromium groundwater contamination from IRP Site RBAAP-03	This area represents a used potable water well. This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
159	Sandblast Building	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
160	Covered Storage Warehouse	Galbestos Panels	This building was identified to have Galbestos panels. The panels have been removed.
		Chromium groundwater	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
		contamination from IRP Site RBAAP-03	
162	Autodin A.B. Terminal Bldg. - Training Rm	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
164	Paint Pumping Building	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
166	Paint Pumping Building	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
167	Air Compressor No. 8	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
169	Paint Spraying Facility	VOCs in soil	Samples collected in 2018 (FOSET Data gap): BTEX compounds were found in the results, but all results were below screening levels.
		Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
13	Austempler Facility – Furnace room	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
172	Former Fire Department	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
175	Generator Building	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
176	Switching Station (Electrical)	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
177	Equipment Wash Facility, Sump, Oil water separator.	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
181	Phosphate Facility	PCBs in soils	This is within the area of the PCB contaminated soils due to deteriorated Galbestos panel. A TCRA was completed and approved in 2018. The removal actions were completed in 2018 and further action will be included in the Parcel A ROD.
		Chromium groundwater	The groundwater within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
		contamination from IRP Site RBAAP-03	
182	Ground Water Treatment Facility	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
184	Flammable Storage Warehouse	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
185	Air Compressor Building	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
186	Haz-Bin Storage Containment Structure	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
187	Haz-Bin Storage Containment Structure	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
188	Haz-Bin Storage Containment Structure	No contamination	No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the area of groundwater contamination.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
189	Land Vehicle Fuel Disp Sta Gas/Diesel	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
190	Land Vehicle Fuel Disp Sta Propane	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
192	Ground Water Treatment Plant Office	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
195	Transformer Substation No. 20	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
196	Transformer Substation No. 21	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
	West Parking	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
	South Parking	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume, and the northwestern portion of this location is within an area that has exceeded chromium MCLs. See RBAAP-03 (ECP Study Section 3) for updates.
	West Utilities	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
	East Utilities	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
	Southeast Utilities	No contamination	No release or disposal of hazardous substances or petroleum products has occurred. Does not fall within the Area of groundwater contamination.
	Southeast Utilities	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	South Utilities	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
	North Open Storage	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
	Central Storage	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
	North Warehouse Storage	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
	West Warehouse Storage	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
	Water Storage	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
	South Warehouse Storage	PCBs in soils	This is within the area of the PCB contaminated soils. The soils are contaminated with PCBs due to deteriorated Galbestos panels. A TCRA was completed and approved in 2018. The removal actions were completed in 2018. Final actions will be included in the forthcoming ROD for Parcel A.
		Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the chromium contaminated groundwater plume; however, the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates

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Location (Building or Feature #)	Site Name/Identifier	Constituent (potential and confirmed)	Remedial actions
	West Railroad Storage	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within the area of this study section currently exceeds the chromium MCLs as defined by the ROD. Groundwater remediation on-going. See updates related to RBAAP-03 (ECP study Section 3).
	East Railroad Storage	Chromium groundwater contamination from IRP Site RBAAP-03	This area is within the Chromium contaminated groundwater plume, however the groundwater is below the MCLs as defined by the ROD. See RBAAP-03 (ECP Study Section 3) for updates.
	Fuel Storage	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
	Hazardous Waste Storage	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
	Administration Open Area	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
	Medical Open Area	Chromium groundwater contamination from IRP Site RBAAP-03	Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.
7	Production Open Area (courtyard)	PCB Contamination in Concrete	In February 2019, a technical memo detailed all the sampling efforts that have taken place within the courtyard areas. It recommended that concrete with PCB results

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Location <i>(Building or Feature #)</i>	Site Name/Identifier	Constituent <i>(potential and confirmed)</i>	Remedial actions
	area within Building 7)		greater than 0.94 mg/kg PCBs be removed (Weston, 2019). The are six areas that had PCB results above action levels, and they are located between Building 7 and 1, and 1 and 2 need to have concrete removed. This work was integrated into the same work plan as other PCB remediation activities on site. The Uniform Federal Policy QAPP that includes this work was approved in June 2020 (Weston, 2020). It detailed that the areas that needed PCB removal actions would have concrete removed 10 feet by 20 feet in half-inch intervals until the action levels are achieved. The activities were completed in 2020 and are pending final documentation in the Parcel A ROD.
Galbestos panels		This building was identified to have Galbestos panels. The panels have been removed.	
Chromium groundwater contamination from IRP Site RBAAP-03		Category 5 because groundwater contamination within this area has exceeded chromium MCLs in the past. Groundwater remediation is on-going. See RBAAP-03 for updates.	

ⁱ The Maximum Contaminant Level (MCL) for chromium used in this exhibit is for total chromium as stated in the signed 1994 Record of Decision (ROD). This MCL will be updated for hexavalent chromium in the forthcoming Explanation of Significant Differences (ESD).

Exhibit G-1: Riverbank AAP Transformers and Other PCB-Containing Equipment

	Transformer Location	Transformer Volume (Gallons)	Manufacture Date	Containing Oil During Operation (Yes/No)	Condition (Good/Poor)	Laboratory Results (mg/L) (Year Sampled)	Comment
	Main #1	1,633	Unknown	Y	G	10 (1996); 14 (2001)*; 18 (2002)*	
	Main #2	1633	Unknown	Y	G	7 (1996)	
	Main #3	1633	Unknown	Y	G	13 (1996)	
	SUB 1	450	Unknown	Y	G	125 (1996)	
	SUB 2 East	450	Unknown	Y	G	3 (1996)	
	SUB 2 West	450	Unknown	Y	P	14 (1996)	SUB 2 West leakng.
	SUB 4 East	129	Unknown	Y	G	Unknown	
	SUB 4 Center	129	Unknown	Y	G	Unknown	
	SUB 4 West	129	Unknown	Y	G	Unknown	
	SUB 6	600	1986	Y	G	50 (2002)*; 44.6 (2016)	
	SUB 7	680	Unknown	Y	G	Unknown	
	SUB 8	680	1954	Y	G	4.2 (2016)	
	SUB 9	Unknown	Unknown	Y	G	Unknown	
	SUB 10	680	1954	Y	G	7 (2002)*; 5.8 (2016)	
	SUB 11	unknown	unknown	Y	G	Unknown	
	SUB 12	975	1952	Y	G	2.1 (2016)	
	SUB 13 West	800	1952	Y	G	60 (1996); 53 (2002)*	
	SUB 13 Center	750	1952	Y	G	57 (1996); 46 (2002)*	
	SUB 13 East	750	1952	Y	G	443 (1996); 363 (2002)*	
	SUB 14 West	145	Unknown	Y	G	3 (1996)	
	Sub 14 Center	145	Unknown	Y	G	<1 (1996)	
	Sub14 East	145	Unknown	Y	G	<1 (1996)	
	SUB 16	210	Unknown	Y	G	73 (1996)	
	SUB 17 Center	750	Unknown	Y	P	44 (1996); 34 (2001)*; 38 (2002)*	SUB 17 is leaking.
	SUB 17 West	750	Unknown	Y	P	196 (1996); 163 (2001)*; 187 (2002)*	SUB 17 is leaking.
	SUB 17 East	750	1952	Y	P	50 (1996); 30 (2001)*; 33 (2002)*	SUB 17 is leaking.
	SUB 18	966	Unknown	Y	G	5246.5 (2016)	
	SUB 19	Unknown	Unknown	Y	G	Unknown	
	SUB 20	Not Oil Containing	Unknown	N	G	-----	
	SUB 21	Not Oil Containing	Unknown	N	G	-----	
	SUB 22	536	2004	Y	G	3.4 (2016)	
Potheads							
	SUB 8	12	Unknown	Y	P	Unknown	1 Pothead
	SUB 9	12	Unknown	Y	P	Unknown	1 Pothead
	SUB 10	12	Unknown	Y	P	Unknown	1 Pothead
	SUB 12	12	Unknown	Y	P	Unknown	1 Pothead
	Former Sub 15 (Building 1)	12	Unknown	Y	P	Unknown	1 Pothead
	Building 8	12	Unknown	Y	P	Unknown	1 Pothead
	Building 13	12	Unknown	Y	P	Unknown	2-Potheads

Oil Reservoir Tanks						
11 Units located within Building 8	100 each (1,100 total)	Unknown	Y		Unknown	Each oil reservoir tank stores approximately 100 gallons of oil. Equipment no longer in use and oil has been drained. This equipment is stored inside. They will be disposed of off-site.

Transformer Equipment Removed from RBAAP						
SUB 3	450, 450	Unknown	Y	-----	Unknown	
SUB 5	1250, 1250, 1250	Unknown	Y	-----	24 (2016)	When operational, had three transformers within this substation. All have been removed.
SUB 15	680, 680	Unknown	Y	-----	Unknown	

Note: The table was taken from the 2019 ECP Update Report. During the 2019 ECP Update, a full inventory of transformers and other electrical equipment was completed.

Sources:

2016 = Applied Power Testing Inspection Lab Sheets

2001 and 2002 *= SD Meyers Inspection Report Data

1996 = Norris Industries Transformer Inspection Lab data

* Source does not have Labsheets. Data came from Lab Inspections from SD Meyers 2005

**Property Management Plan
For
Land Use Controls
Riverbank Army Ammunition Plant**

Prepared By
Office of the Deputy Assistant Secretary of the Army
Environment, Safety and Occupational Health
Base Realignment and Closure

January 2026

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Acronyms

µg/L	micrograms per liter
BMP	Best Management Practice
BRAC	Base Realignment and Closure
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRUP	Covenant to Restrict the Use of Property
DTSC	Department of Toxic Substances Control
E/P	evaporation/percolation
EPA	United States Environmental Protection Agency
ESD	Explanation of Significant Differences
FFA	Federal Facility Agreement
FOSET	Finding of Suitability for Early Transfer
GWTP	Groundwater Treatment Plant
GWTS	Groundwater Treatment System
HWMU	Hazardous Waste Management Unit
IC	Institutional Control
IRP	Installation Restoration Program
IWTP	Industrial Wastewater Treatment Plant
LUC	Land Use Controls
LUCC	LUC Compliance
LUCRD	Land Use Control Remedial Design
MCL	Maximum Contaminant Limit
mg/kg	milligrams/kilogram
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
NWSWR	Northwest Stormwater Reservoir
PCB	polychlorinated biphenyl
PMP	Property Management Plan
ppm	Part Per Million
QAPP	Quality Assurance Project Plan
RBAAP	Riverbank Army Ammunition Plant
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation/Feasibility Study
RLRA	Riverbank Local Redevelopment Authority
ROD	Record of Decision
RWQCB	Central Valley Regional Water Quality Control Board
SWMU	Solid Waste Management Unit
TCRA	Time Critical Removal Action
TPH	Total Petroleum Hydrocarbons
TSCA	Toxic Substance and Control Act
USACE	United States Army Corp of Engineers

1.0 INTRODUCTION

This Property Management Plan (PMP) for the implementation of Land Use Controls (LUCs) describes the LUCs that apply to activities, site access, and reuse of the former Riverbank Army Ammunition Plant (RBAAP). Some of the LUCs have been or will be selected in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)(42 U.S.C. §9601 *et. seq.*) site-wide Record of Decision (ROD) (Army, 1994) and Explanation of Significant Differences (ESD) #1 (Army, 2013), for the former RBAAP, and others are selected and incorporated as industry best management practices (BMPs). The 1994 ROD selected individual unit-based LUCs specific to the landfill while also relying on an industrial/commercial reasonably foreseeable reuse without specifying that reuse as LUC component of the final remedy. Subsequent remedial investigations, environmental response actions, and the closure and subsequent leave of the site have necessitated additional LUCs described herein. There is a second ESD (ESD #2) that will be finalized in 2026. The purpose of ESD #2 is to select the reasonably foreseeable reuse of industrial/commercial as a LUC, thus prohibiting residential exposure at the site. In the interim, the LUCs are being documented in Environmental Protection Provisions (EPPS) in the lease documents. The LUCs are specifically related to the following cleanup sites:

- RBAAP-01: Landfill
- RBAAP-03: Contaminated Groundwater
- Solid Waste Management Unit (SWMU)1: Industrial Wastewater Treatment Plant (IWTP) Area
- RBAAP 14: Galbestos Panel Removal (and other Parcel A removal actions)
- RBAAP-17: Parcel 1 and 1A on-post removal

The majority of the LUCs specified herein were chosen in accordance with CERCLA and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP)(40 CFR Part 300). The LUCs are intended to be protective of human health and the environment under the current and reasonably anticipated future land use of each site and to prevent unacceptable human health risks from exposure to contaminated soils or groundwater.

1.1 PMP Performance Objectives

The objective of this PMP is the preservation of controls put in place to protect human health and the environment at those sites where contamination remains above levels allowable for unrestricted use. These sites include areas encompassing groundwater contamination resulting from the former IWTP operations, the landfill site, SWMU 1 (IWTP) addressed under the former Resource Conservation and Recovery Act (RCRA) Permit and industrial operation areas where contaminants in soil remain above levels allowing for unrestricted use. The sites will remain subject to CERCLA as long as the contaminants present a threat to human health and the environment. The controls described in this document shall be implemented to achieve the following objectives:

- The continued compliance with all terms and conditions of the 1994 ROD, the planned Parcel A ROD, the ESD #1 and future ESD #2, and the Environmental Protection Provisions of the lease in accordance with CERCLA and with the requirements of the former RCRA Permit;
- Ensure that activities at a site or future uses remain in compliance with the restrictions outlined in the implementation plan for that site or environmental media;
- Prevent excavation and construction that would compromise the integrity of any protective structures such as the landfill cap or pavement in the vicinity of the IWTP with the exception of Army and agency authorized activities;
- Prohibit the human consumption of groundwater on-post that exceeds Federal Maximum Contaminant Levels (MCLs);
- Provide landowners in the vicinity of the off-post groundwater contamination via Stanislaus County Department of Environmental Resources with annual notifications regarding the status of the cleanup efforts and advised use restrictions; and
- Ensure that routine maintenance activities required to ensure the integrity of the landfill cap and groundwater treatment/monitoring are performed, including inspections and maintenance to prevent damage or unauthorized modifications.

2.0 SITE NAME, LOCATION AND DESCRIPTION

RBAAP is located at 5300 Claus Road, Riverbank, Stanislaus County, California, one mile south of the Stanislaus-San Joaquin County border and approximately five miles northeast of the city of Modesto (Figure 1). Prior to closure, RBAAP occupied a total of 168 acres of land and consists of two noncontiguous areas represented by the main plant area (approximately 139.2 acres) and the Evaporation/Percolation (E/P) ponds. After closure, RBAAP was subdivided into parcels, with the intent of accelerating property transfer as each parcel was prioritized for environmental remediation. The current intent is to transfer the entire RBAAP under a Finding of Suitability of Early Transfer (FOSET), thus negating the need to prioritize the subdivided parcels; however, the parcel identification nomenclature is still used to designate specific LUCs and areas distinct from adjacent parcels. This PMP applies to the Main Plant area, which is Parcels A, 1, 1A, 2 and 2A (including the NW Stormwater Reservoir (NWSWR). See Figure 2 for a map of these parcels and Figure 3 for the historical land use at RBAAP.

Parcel A is approximately 77.68 acres and includes most of the industrial buildings and facilities on RBAAP. The NWSWR is approximately 3.25 acres and receives stormwater from Parcel A. Parcel 1 is 8.46 acres and Parcel 1A is 4.37 acres. Parcels 1 and 1A are south of and adjoining to Parcel A. The parcels were used for employee parking while RBAAP was operational. Parcel 2 is 19.563 acres, has no known releases of hazardous substances or pollutants and contaminants requiring a remedial action, and is mostly open space. Parcel 2 is north of and adjacent to Parcel A and the NWSWR.

Parcel 2A is approximately 3.25 acres and is adjacent to the western side of Parcel A. Parcel 2A is leased to the Riverbank Local Redevelopment Authority (RLRA) and is used for the storage of mobile homes and recreational vehicles.

Studies indicated that there was chromium and cyanide in the groundwater above state and federal MCLs under some areas of the property and some down gradient off site areas due to historical industrial activities. This contamination led to RBAAP being placed on the National Priorities List (NPL) on February 21, 1990. In June 1990 a Federal Facility Agreement (FFA) was signed for RBAAP under CERCLA Section 120. The FFA established the framework for CERCLA response actions. In 1994 a site-wide ROD was finalized and signed by the United States Environmental Protection Agency (EPA), California EPA-Department of Toxic Substances Control (DTSC), the California EPA- Central Valley Regional Water Quality Control Board (RWQCB) and the U.S. Army. The ROD established the remedial activities for several environmental sites, discussed below.

The Army published ESD #1 in January 2013 to change the groundwater remedy for chromium in the 1994 ROD to add in situ treatment for chromium to the groundwater remedy. The FFA Parties plans to finalize ESD #2 to clarify and select LUCs as part of the final remedy and to incorporate the connection to the municipal water system. There are other planned future RODs related to releases, but the LUCs selected in the future RODs will align with ESD #2.

2.1 RBAAP-01: Landfill

RBAAP-01 is approximately 4.5 acres and is located in the northern section of the main plant near the eastern boundary. The landfill location is shown in Figure 4. The landfill was the site of surface and trench disposal and burning from 1942 to 1966. The disposal operations in this area consisted of two discrete disposal trenches and a surface disturbance area. According to records from 1942 to 1966, the landfill at the RBAAP was used for the incineration and disposal of paper, dunnage, oils, grease, solvents, hospital wastes, construction debris, and industrial sludges (Weston, 1991). In 1966, onsite disposal operations were discontinued, and the area was filled with dirt and construction rubble. The Army installed and maintained a clay cap at the landfill as required by the final Site-Wide 1994 ROD. The 20-year maintenance period for the landfill is complete, however, due to the ongoing groundwater treatment and potential ongoing chromium and cyanide source at the landfill, it is recommended that the landfill cover continue to be maintained until no unacceptable risk to human health and the environment is found in the vicinity of the landfill (USACE, 2022).

2.2 RBAAP-03: Contaminated Groundwater

The Installation Restoration Program (IRP) Site RBAAP-03 contains chromium and cyanide groundwater contamination that was initially suspected to result from leakage associated with the original IWTP. The original IWTP at RBAAP was constructed to treat the wastewaters generated from the electroplating, cleaning, and metal finishing processes that operated on-site. The original storage and equalization tanks used for the IWTP were made of redwood.

From 1973 to 1980, the IWTP was upgraded and the redwood tanks were replaced with concrete tanks (Weston, 1991).

The original IWTP redwood tank area was initially identified as the major source of chromium contamination. However, results from investigations at the IWTP show that this area is not the source of chromium contamination. High concentrations of chromium or cyanide were not detected in shallow soils in the area, detections from 20 feet to 60 feet were present but not at concentrations that would support the idea that the source area of the groundwater chromium or cyanide contamination was the former redwood tank area. The suspected source of the contamination is the general industrial operations of the plant.

The groundwater contamination was addressed in the site-wide ROD (U.S. Army, 1994). The ROD required expansion of the interim Groundwater Treatment System (GWTS). The expanded system began operation in 1997 and removes contamination from the extracted water by means of ion exchange. The cleanup goals for chromium and cyanide were established in the ROD and are 50 micrograms per liter ($\mu\text{g/L}$) and 150 $\mu\text{g/L}$, respectively. The treated groundwater is discharged to the E/P Ponds under discharge permit 5B50NC00012. The cleanup goals since the 1994 ROD have been updated to reflect current day requirements. The original ROD cited a MCL of 200 $\mu\text{g/L}$ for cyanide, but the California MCL for cyanide has since been reduced to 150 $\mu\text{g/L}$. Additionally, ESD #2 will memorialize the change of the chromium remedial goal from the prior State MCL of 50 micrograms per liter ($\mu\text{g/L}$) to the revised State MCL of 10 $\mu\text{g/L}$ for hexavalent chromium.

The Army also conducted an in-situ pilot test of ferrous iron and carbon injection to determine if this could result in an alternative treatment of chromium in the groundwater. The results of the in-situ pilot test demonstrated that reductant injections rapidly reduced dissolved chromium concentrations by precipitating chromium (AGSC, 2009a, 2009b).

In 2013, the Army finalized ESD #1 to conduct in-situ treatment to address chromium in groundwater (U.S. Army, 2013). In 2014, the EPA and DTSC approved a Geochemical Fixation In Situ Treatment Work Plan (AES, 2013). The Central Valley RWQCB issued a Notice of Applicability R5-2008-0149-053 to cover the remedial activities implemented under the work plan. The post-injection data showed that the dissolved and hexavalent chromium concentrations were either non-detect or significantly lower than the starting concentrations at the points of injection (AES, 2016).

In January 2017, EPA and DTSC concurred with Addendum 1 to the In Situ Treatment Work Plan to address the potential source of chromium contamination near the main production facilities on the southern end of the parcel (AES, 2017). The Central Valley RWQCB issued Notice of Applicability R5-2015-0012-031 to cover the remedial activities implemented under the addendum. Army completed the installation of the injection wells in September 2017. Initial results indicated that the treatment had lowered dissolved chromium concentrations (AES, 2019). However, subsequent monitoring results suggested that the in-situ Phase I reduction zone at the Building 13 Area had diminished (AES, 2019). The Army completed supplemental

injections in accordance with Addendum 2 to the Geochemical Fixation In-Situ Treatment Work Plan (Ahtna Global, LLC [AGL], 2019).

The Army is implementing additional in-situ treatment activities. Although previous phases have shown substantial decreases in dissolved and hexavalent chromium concentrations near the treatment areas; the effects have been localized and additional action is necessary to address the Building 13 Area chromium plume. The field efforts for this work began in November 2025 (Ahtna, 2025).

The Army is implementing a Remedial Investigation/Feasibility Study (RI/FS) related to PFAS releases caused by the Army. The LUCs related to PFAS releases, if required, are anticipated to remain the same as those documented in the EPPs and future ESD #2.

Remedial actions at RBAAP-03 will continue until remedial goals have been reached. The Army will retain responsibility for all remediation activities associated with the groundwater contamination.

Due to groundwater contamination, the proximity of parcels, and out of abundance of caution, groundwater use restrictions have been placed on Parcels A, 1, 1A, 2, 2A and NWSWR. The site-wide groundwater restriction is required under the future ESD #2. Figure 2 depicts the area of on-post groundwater use restrictions.

The GW remediation and monitoring is on-going, so the LUCs for all parcels include the restriction of any activity that may interfere with the remedial efforts and monitoring systems. Figure 5 shows the well locations for the Main Production Area and Figure 6 shows the well locations at the E/P Ponds.

2.3 SWMU 1: IWTP

RBAAP held a RCRA Part B Hazardous Waste Facility Permit (Permit No. CA7210020759) for the treatment and storage of hazardous waste. In August 2016, the RCRA permit, which included the IWTP facility, was closed in accordance with the closure requirements of that RCRA permit and State approval. The location of the IWTP is shown on Figure 7.

The IWTP was a treatment facility for industrial wastewater generated at the installation from electroplating, cleaning, and metal finishing processes. The primary treatment technologies were coagulation, flocculation, and clarification. The former IWTP was located to the immediate north of the production plant at the installation. Treated effluent water was discharged to the E/P Ponds via underground piping.

The IWTP was built after the Army acquired the facility in 1951. From 1952 to 1954, production lines 5 and 6 produced zinc-plated shells for the Navy. Because the zinc was electroplated from a cyanide solution, a separate system was required to treat waste from this area. Cyanide solutions were diverted to a special tank in the IWTP where chlorine was added

for neutralization. The neutralized cyanide waste joined the normally treated waste and both were transported to the E/P Ponds. The cyanide treatment tanks have not been in use since 1954. A Phase I RI was conducted between January 1987 and November 1998. However, in a letter dated July 27, 1998, DTSC recommended discontinuation of the investigation. DTSC believed that, due to the presence of existing system components, additional characterization of the IWTP should wait until Permit closure.

In 2012, the Army began the decommissioning, investigation, and remediation of the IWTP in accordance with the closure requirements of the RCRA Permit. The Army issued the *Closure Certification Report Hazardous Waste Management Unit #1 Industrial Waste Treatment Plant RCRA Hazardous Waste Facility Permit Closure, RBAAP, California* in 2013, which details the sampling conducted in the IWTP as part of the RCRA closure. Soil borings were advanced next to several of the IWTP sub-units and soil samples were collected and analyzed at these locations.

In February 2014, the Army submitted Closure Certification Reports for the 13 Hazardous Waste Management Units (HWMUs) to the DTSC for various areas of the Property as part of the larger RCRA Permit closure. Closure activities for the IWTP continued throughout 2014-2016. On August 1, 2016, the Army obtained closure certification for the RCRA Permit including all 13 HWMUs and the IWTP from DTSC.

The entire IWTP area is now covered with concrete or asphalt. The groundwater under the IWTP is being addressed under the site RBAAP-03 under CERCLA.

2.4 RBAAP 14: Galbestos Panel Removal (and other removal actions) on Parcel A

2.4.1 Parcel A - Galbestos Panel Removal and associated soil contamination: Polychlorinated biphenyl (PCBs) were detected in Galbestos® panels on Buildings 1-8, 11, 12, 15, 33-39, 43, 45-50, 80-83, 107, 133 and 160 and attached structures (USACE, 2011). Galbestos® is a galvanized sheet metal siding with a layer of asbestos felt on one side which had been dipped in an asphaltic coating containing PCBs. Over the years, the Galbestos® siding weathered, allowing a non-liquid form of PCBs to be released. Sampling results detected a release of PCBs from the Galbestos® panels above Toxic Substance and Control Act (TSCA) criteria as well as EPA Regional Screening Levels in several locations adjacent to buildings in the main plant area (Parcel A) and the NWSWR and Southeast Storm Water Reservoir [United States Army Corps of Engineers (USACE), 2013].

The Galbestos® panels were removed and appropriately disposed of offsite during 2018. All actions are complete and pending final documentation (final report was submitted to EPA in 2020).

Due to the deterioration of the Galbestos® panels, the soil south of Building 6 was contaminated with PCBs. A Time Critical Removal Action (TCRA, 40 CFR 300.415(b)) was conducted to remove contaminated soil. This soil contamination was characterized and

remediated in 2018. The actions for this area were completed as described by the TCRA Action Memo and Work Plan (Weston, 2018a and Weston, 2018b). During the remediation effort, the soil was excavated to approximately one to four feet below ground surface. All confirmatory samples were below the industrial action level of 0.95 parts per million (ppm) PCBs. As part of the same effort, the soil and sediment in the Northwest and Southeast stormwater reservoirs were sampled for PCBs and the stormwater conveyance system was flushed and cleaned of any soil contamination. These actions were completed in accordance with the TCRA Action memo and associated work plan (Weston, 2018a and Weston, 2018b). Site investigations and a final CERCLA remedy will be completed through the RI/FS, Proposed Plan and ROD process. The related documentation is currently under review, including additional requested sampling and analysis in several areas. It is unlikely the additional data will change the LUCs required to prevent residential uses.

2.4.2. Parcel A – Building 11, Paint and Oil Storage area: This area was sampled for PCBs and total petroleum hydrocarbon (TPH) compounds. There was one area with the PCB concentrations above 1 ppm (7.4 ppm PCBs). The TPH sample results were less than the commercial/industrial worker exposure risk levels, but above residential levels. Through the TRCA work plan associated with the Galbestos® panels (Weston, 2020), the soil that contained PCB concentrations above 1 ppm was excavated. LUCs will be formally documented in the upcoming ESD #2.

2.4.3. Parcel A – Structure 95, Substation No. 1: Previous soil sample results from 2008 yielded a maximum concentration of 0.26 ppm PCBs. These levels are below any action level. The area will remain secured and marked (Weston, 2018c). It is recommended to leave this area as an electrical outdoor substation. LUCs will be formally documented in the upcoming ESD #2.

2.4.4 Parcel A - Structure 97, Substation No. 3: This area underwent PCB and TPH analysis to characterize the extent of contamination. The maximum concentration for TPH as diesel was 6,600 mg/kg. The PCB concentrations in both the soil and concrete transformer pad were above 1 ppm PCBs. This transformer is inactive, and due to the PCB levels above 1 ppm PCBs, the remaining equipment was removed, and the contaminated soil was removed. LUCs will be formally documented in the upcoming ESD #2.

2.4.5 Parcel A – Structure 101, Substation Spare: This area underwent PCB analysis to characterize the extent of contamination. The transformers are no longer present. The concrete was sampled, and yielded results of 6.8 ppm of PCBs. The soil concentrations ranged from 0.074 ppm to 1.9 ppm PCBs. Due to the fact that this area is no longer used and has elevated levels of PCBs, the pad and contaminated soil was removed as part of the TRCA work. The work plan received approval in June 2020 (Weston, 2018c). The Uniform Federal Policy Quality Assurance Program Plan (QAPP) was approved in June 2020 to help delineate remedial actions (Weston, 2020). LUCs will be formally documented in the upcoming ESD #2.

2.5 Parcel 1 and 1A on post PCB remediation

Parcels 1 and 1A were used for employee parking while RBAAP was operational. The presence of PCBs in surface soils was confirmed during an investigation in 2013 (USACE, 2015). Following the 2013 investigation, a cleanup of PCB impacted soils on Parcels 1 and 1A was conducted from November 2015 through June 2017. The remedial action goals established were 0.99 milligrams/kilogram (mg/kg) for soil and 0.22 mg/kg PCBs for sediments. After excavation of grids established for the TCRA, the fencing at the south and east boundaries of the two parcels was restored and an elevated soil berm was placed in the areas where the fence was restored to arrest off-post migration of precipitation. A RI/FS and ROD are being completed to select LUCs specific to residual soil contamination at Parcels 1 and 1A. Additional sampling and removal actions are planned, however the LUCs are not anticipated to change.

The remedies selected under the Site-Wide ROD, ESD #1 and ESD #2 outline restrictions on future use of the property, including the prohibition of residential use and the requirement to utilize an approved soil management plan when undergoing soil disturbance activities in specific areas. These remedies are implemented by the Army through the LUC Remedial Design (LUCRD) and deed restrictions, as described in the Environmental Protection Provisions, and are meant to protect human health and the environment. They are further implemented outside of the CERCLA process by the State of California in the Covenant to Restrict the Use of Property (CRUP). The dual layers of protection provide the best use of administrative controls to protect the public health and welfare, and the environment but only the LUCRD is considered an enforceable CERCLA remedial design document. The general responsibilities of the Army and potential future property owners and/or lessees are described in the Subsections below, *i.e.*, LUC implementation, notification, and inspection reporting and enforcement for the LUCs.

2.6 Evaporation/Percolation Ponds

The E/P Ponds are identified as SWMU-23 in the June 2002 Corrective Action Consent Order (DTSC, 2002). The unlined ponds were constructed in 1952 for the disposal of treated industrial wastewater generated at RBAAP and continue to be used for that purpose. The four ponds are on land owned by the U.S. Army adjacent to the Stanislaus River. The ponds are operated independently based upon the volume of effluent flow. A sediment removal action was completed in 1993 to address elevated zinc in sediments. The E/P Ponds were determined to require no further remedial action in the 1994 ROD but undergo quarterly groundwater monitoring as specified in the Waste Discharge Requirements Order No. 5-01-200.

The Army is preparing to conduct an ecological risk assessment to determine if the 1993 Removal Action eliminated the unacceptable risk to the ecological receptor.

3.0 RBAAP LAND USE CONTROLS

3.1 On-Post Land Use Restrictions and Requirements

The LUCs for RBAAP are identified below and consist of soil and groundwater restrictions, residential use restrictions, deed restrictions, and environmental covenants. These LUCs will be incorporated into the RLRA Master Development Plan. Declaration of Covenants, Conditions, and Restrictions provide additional layers of protection and are described in further detail in the subsections. The expected LUC duration is until the concentration of hazardous substances in the soil and/or the groundwater have been reduced to levels that allow for unlimited use and unrestricted exposure. Figure 2 shows the areas at RBAAP subject to land use restrictions.

The Army is responsible for implementing, maintaining, reporting on, and enforcing the LUCs. Although the Army intends to transfer these procedural responsibilities to another party by contract, property transfer agreement, or through other means, the Army shall retain responsibility for remedy integrity. Any activity that is inconsistent with the institutional controls (IC) objectives or use restrictions, or any other action that may interfere with the effectiveness of the ICs will be addressed by the Army as soon as practicable, but in no case will the process be initiated later than ten days after the Army becomes aware of the breach. The Army will notify EPA and the State as soon as practicable but no longer than ten days after discovery of any activity that is inconsistent with the IC objectives or use restrictions, or any other action that may interfere with the effectiveness of the ICs. The Army will notify EPA and the State regarding how the Army has addressed or will address the breach within ten days of sending EPA and the State notification of the breach. Prior to seeking approval from the EPA and the State, the recipient of the property must notify and obtain approval from the Army of any proposals for a land use change at a site inconsistent with the use restrictions and assumptions described in the 1994 ROD, ESD #1 and the future ESD #2. The Army shall not modify or terminate LUCs, implementation actions, or modify land use without approval of EPA and concurrence of the State, as set forth in the FFA for RBAAP. The Army shall seek prior concurrence before an anticipated action that may disrupt the effectiveness of the LUCs or an anticipated action that may alter or negate the need for LUCs.

The Land Use Controls for Parcels A, 1, 1A, 2, 2A and the NWSWR includes the following:

3.1.1 On-Post Residential Use Restriction: Parcels A, 1, 1A, 2, 2A and the NWSWR shall be used solely for commercial or industrial activities and not for residential purposes. "Residential" includes, but is not limited to:

- (a) A residence, including any mobile home or factory-built housing, constructed or installed for use as residential human habitation.
- (b) A hospital for humans.
- (c) A public or private school for persons under 18 years of age.
- (d) A day care center for children.

3.1.2 On-Post Groundwater Use Restriction. Groundwater on Parcel A, 1, 1A, 2, 2A and the NWSWR shall not be accessed or used for any purpose. For the purpose of this restriction, groundwater shall have the same meaning as in §101(12) of CERCLA. This restriction does not apply to removal actions, remedial actions, or any remediation efforts. Prohibited activities include:

- (a) Drilling for any water, oil, or gas, without the prior written consent of the FFA Parties.
- (b) Extraction or removal of groundwater without the prior written consent of the FFA Parties
- (c) Exception. This section does not apply to three wells (I1, I5 and I6) that are currently permitted under RWQCB Water System No. CA5000211.

3.1.3. On-Post Restriction on the Interference with Remedial Efforts and Monitoring Systems. Activity on Parcels A, 1, 1A, 2, 2A and the NWSWR that may alter, interfere with, or otherwise affect the integrity or effectiveness of, or the access to, any investigative, remedial, monitoring, operation or maintenance system (e.g., cap, vapor extraction system, monitoring system, groundwater extraction system and infrastructure, groundwater wells, groundwater well heads, in situ treatment systems, etc.) is prohibited without prior written approval of the FFA Signatories.

3.1.4. Restriction on Access, Excavation and Other Soil Disturbing Activities on the Landfill on Parcel A. The Owner or Occupant shall not conduct or permit others to conduct any excavation activities (including but not limited to digging, drilling, or any other excavation or disturbance of the land surface or subsurface) on the landfill as described in Figure 4, or any other activities that may damage the landfill soil cover and liner. The Owner or Occupant shall not construct, make, or permit any alterations, additions, or improvements to the landfill in any way without prior written approval of FFA Signatories.

3.1.5. Restricting Soil Disturbances for Parcels A, 1, 1A and the NWSWR. No activities that will disturb the soil (including but not limited to digging, drilling, or any other excavation or disturbance of the land surface or subsurface) shall be allowed on Parcels A (not including the landfill that is covered under Section 3.2.4 above), A, 1, 1A and the NWSWR without a Soil Management Plan pre-approved by the FFA Signatories in writing. This restriction does not apply to removal actions, remedial actions, or any remediation efforts.

Any soil brought to the surface by grading, excavation, trenching, or backfilling shall be managed in accordance with all applicable provisions of state and federal law.

3.1.6. Best Management Practices for Soils within Parcels 2 and 2A. While there is no CERCLA remedy specific to a known release on Parcels 2 and 2A, the unimproved land is adjacent to parcels with known contamination. SWMU 22 (Sanitary Wastewater Settling Ponds) were located on Parcel 2 and was properly closed under the RCRA Permit. SWMU 22 was then further investigated under the Corrective Action Consent Agreement. No release of a hazardous substance, pollutant, or contaminant was identified. Due to the potential for

adjacent releases, Parcels 2 and 2A is subject to the best management practice of sampling for contaminants of concern whenever earthmoving activities disturb one-half acre or more of soil. The soil management plan should describe the contaminants to be sampled, the method of sampling, and the contingency activities that will be required if contamination is identified (i.e., accumulation areas, personal protective equipment, and off-post disposals).

3.1.7 The area defined as the E/P Ponds is currently used as a discharge basin for treated water from the groundwater treatment plant (GWTP) at RBAAP. The ponds receive water from RBAAP via a 3.4-mile underground pipe. Discharge to the ponds is conducted in accordance with the RWQCB Waste Discharge Requirements Order No. 5-01-200 (RWQCB, 2001). The E/P ponds will continue to be maintained for this purpose until no longer needed for the GWTP operations.

This use will be maintained until the conclusion of the ecological risk assessment to determine if further restrictions are necessary.

4.0 REPORTING

Beginning upon approval of the PMP and continuing until the effective date of property conveyance, the Army will provide to EPA, DTSC and the RWQCB an annual LUC Compliance Report. Following property conveyance, either the Army or new property owner will continue to provide annual LUC Compliance (LUCC) Reports as will be determined in the terms of the transfer and documented in the deed.

As the basis for the LUC Compliance Report, the LUCC or designee shall inspect the sites to evaluate compliance with required restrictions. The compliance report will be submitted annually as a letter report containing the following information:

- Identification of the site and associated restrictions;
- A summary of the physical site inspections at each site;
- Information on any violations. Should any violation or deficiency be found during a site inspection, the Army will provide a written explanation describing the deficiency and what efforts or measures have or will be undertaken to correct the deficiency;
- Identification any corrective actions found to be necessary as a result of changes in site conditions;
- Any proposed changes to inspection and reporting frequency.

5.0 DOCUMENTATION OF RESTRICTIONS

5.1 Signage

Information signs will be upgraded and placed at the landfill site informing people accessing

these areas that there are use restrictions. The signs will indicate that the area is subject to land use controls and will identify the organization to contact regarding questions or concerns.

5.2 Map of LUC Locations

Maps showing the locations of sites with land use controls will be provided to all users of the property.

6.0 ENFORCEMENT

A site will continue to be subject to regulations under CERCLA until such time that it is shown that the remedy is complete, or the site conditions no longer represents a threat to human health or the environment.

Should a site be transferred, the Army shall include all existing regulatory restrictions on the transfer deed in the form of restrictive covenants or deed restrictions. The deed provisions will include requirements for the Army or future owner to enforce, maintain, and annually inspect the sites and associated controls.

7.0 TERMINATION OF LAND USE CONTROLS

Land Use Controls will be maintained until the concentration of hazardous substances in the soil and groundwater are at such levels to allow for unrestricted use. The following options are available with regulatory concurrence should the Army or future property owner decide that the land use controls at a site need to be modified:

- A new evaluation of the site. The evaluation may include an evaluation of historical data against current standards. The evaluation could find that contamination levels are below the protective standard values.
- Performance of additional remediation such that use restrictions would no longer be required.

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USACE, 2022. *Final Fifth Five Year Review for Riverbank Army Ammunition Plant*. Riverbank Army Ammunition Plant, March.

Weston. 1991. *Riverbank Army Ammunition Plant Remedial Investigation Report*. Prepared for U.S. Army Toxic and Hazardous Materials Agency, Aberdeen Proving Ground, Maryland 21010-5401. July.

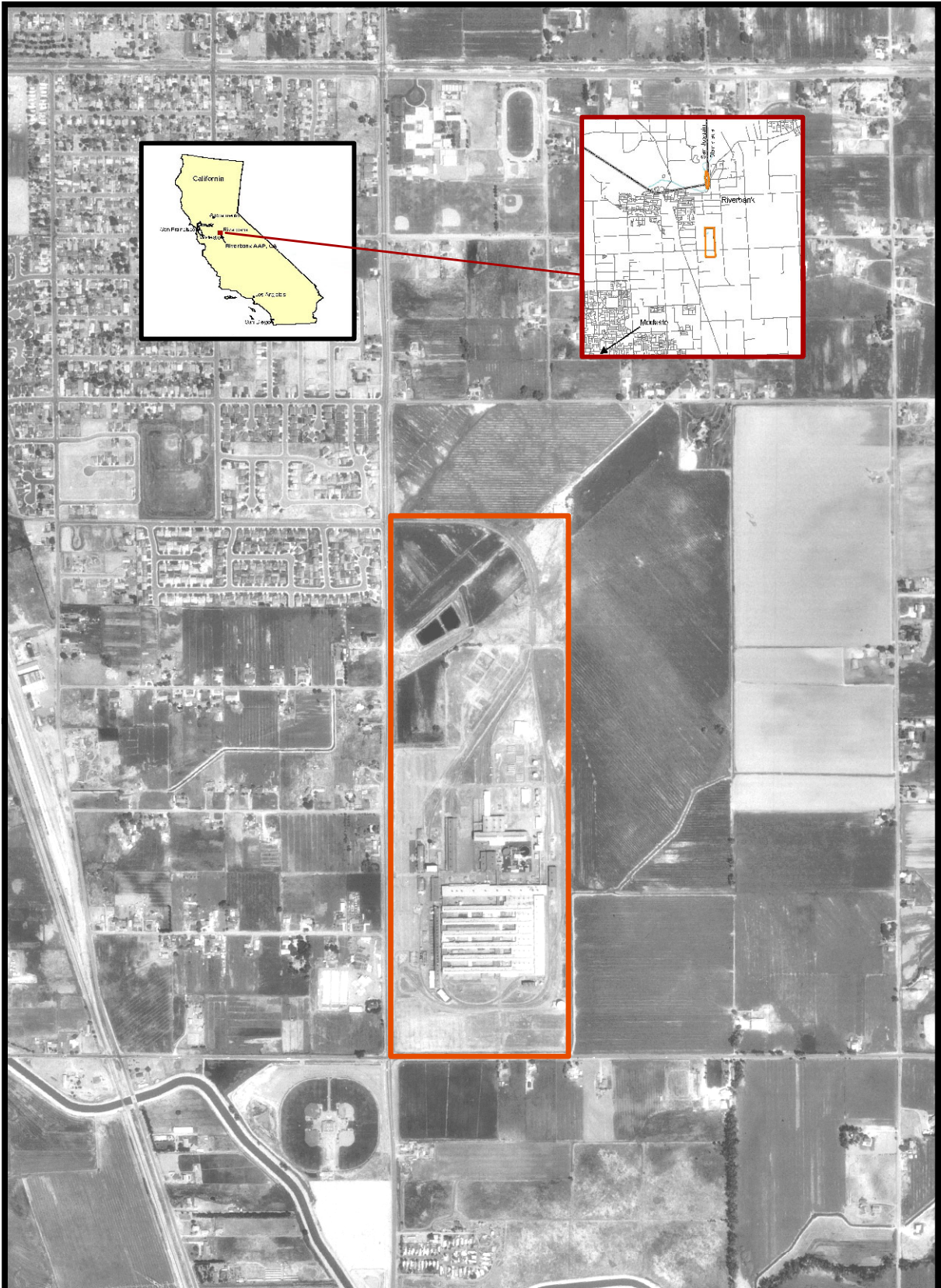
Weston, 2018a. *Final Action Memo Parcel A Soil/Sediment Time-Critical Removal Action. Former Riverbank Army Ammunition Plant, California*. January.

Weston, 2018b. *Final Work Plan Parcel A Soil/Sediment Time-Critical Removal Action. Former Riverbank Army Ammunition Plant*. February.

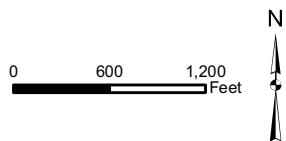
Weston, 2018c. *Draft Final Finding of Suitability Early Transfer (FOSET) Data Gap Sampling Report*, October.

Weston, 2020. *Uniform Federal Policy – Quality Assurance Project Plan FOSET Datagap and Courtyard Remediation*. May.

Figures



SOURCE: USACE, 2006



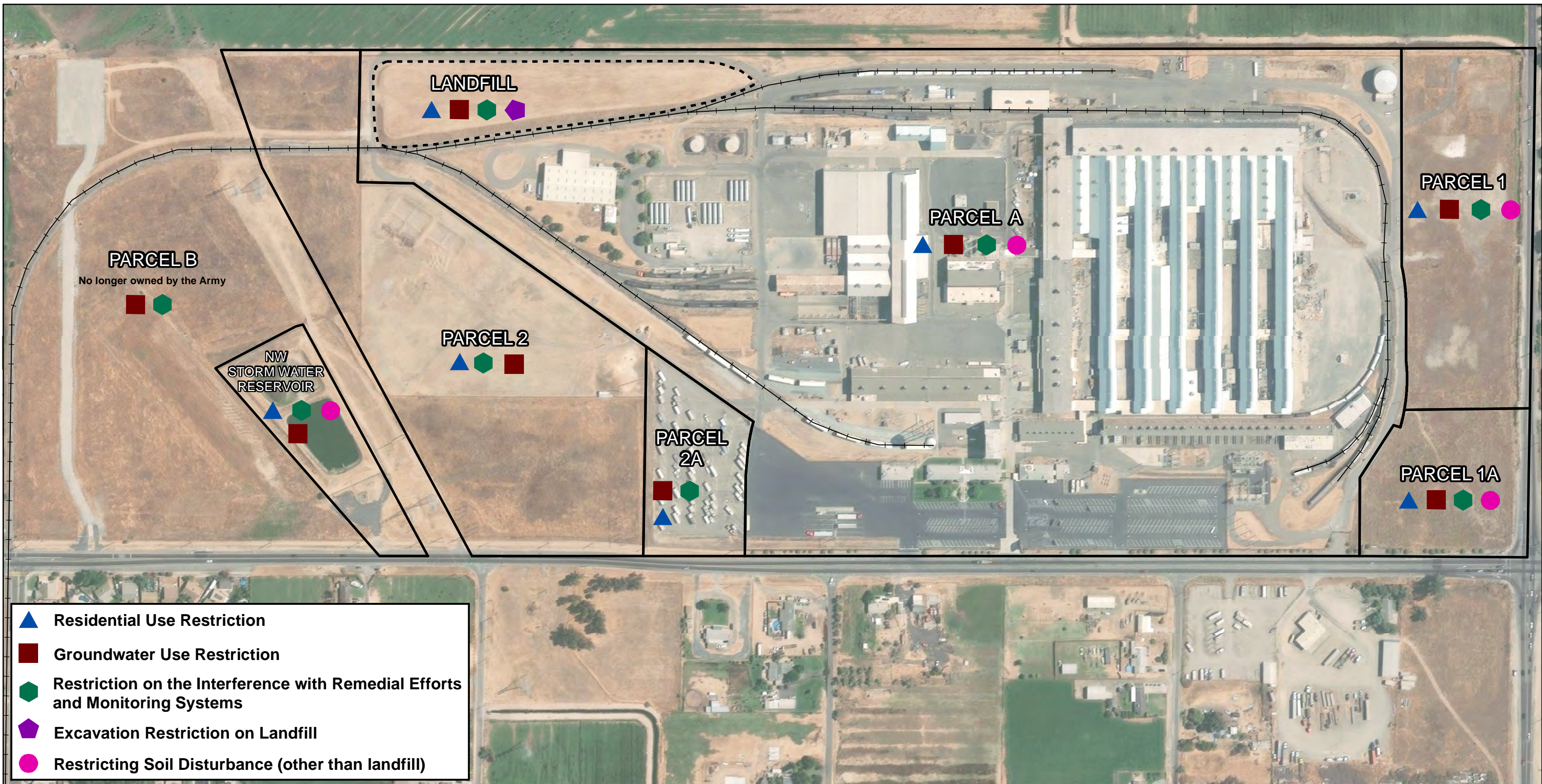
LEGEND






 RBAAP PROPERTY BOUNDARY





**FIGURE 1
RBAAP Location**

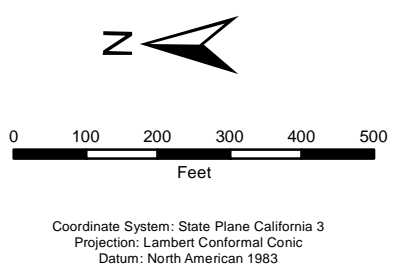
*Riverbank Army Ammunition Plant
Riverbank, California*

CH2MHILL



-  Residential Use Restriction
-  Groundwater Use Restriction
-  Restriction on the Interference with Remedial Efforts and Monitoring Systems
-  Excavation Restriction on Landfill
-  Restricting Soil Disturbance (other than landfill)

- Legend**
-  Parcel Boundary
 -  Landfill
 -  Carve Out
 -  Railroad



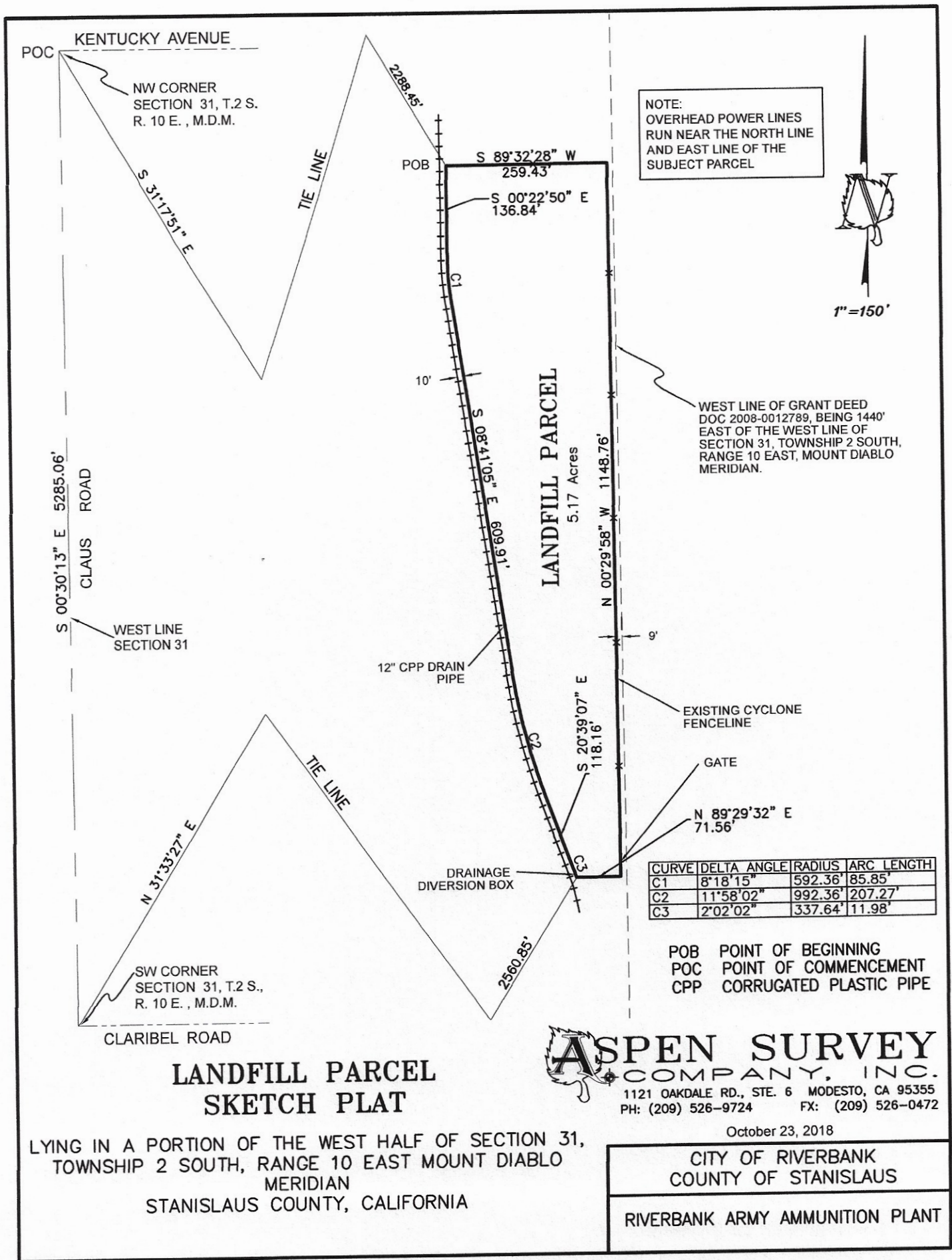
Riverbank Parcel Use Restrictions

Riverbank Army Ammunition Plant
 Riverbank, California
 Stanislaus County



The data depicted in these GIS layers are the result of digital analyses performed on a database consisting of information from a variety of governmental and other credible sources. The accuracy of the information presented is limited to the collective accuracy of the database on the date of the analysis. This information is believed accurate, and reasonable efforts have been made to ensure the accuracy of the data. However, the U.S. Army Corps of Engineers, Sacramento District GIS Unit expressly disclaims responsibility for damages or liability that may arise from using this data. This product is the property of the U.S. Army Corps of Engineers, Sacramento District GIS Team, and this product's use is thereby restricted.

EXHIBIT F Landfill Survey



**LANDFILL PARCEL
SKETCH PLAT**

LYING IN A PORTION OF THE WEST HALF OF SECTION 31,
TOWNSHIP 2 SOUTH, RANGE 10 EAST MOUNT DIABLO
MERIDIAN
STANISLAUS COUNTY, CALIFORNIA

ASPEN SURVEY
COMPANY, INC.
1121 OAKDALE RD., STE. 6 MODESTO, CA 95355
PH: (209) 526-9724 FX: (209) 526-0472

October 23, 2018

CITY OF RIVERBANK
COUNTY OF STANISLAUS
RIVERBANK ARMY AMMUNITION PLANT

EXHIBIT "E"
Legal Description
Landfill Parcel

All that portion of the west half of Section 31, Township 2 South, Range 10 East, M. D. B. & M., described as follows:

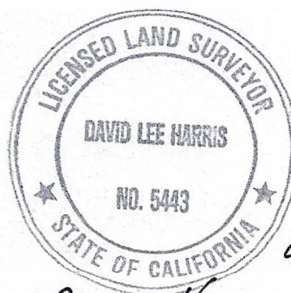
COMMENCING at the northwest corner of said Section 31 at the intersection of Claus Road and Kentucky Avenue; thence South $31^{\circ}17'51''$ East along a tie line, 2288.85 feet to the Point of Beginning, said point being 10 feet easterly from the center line of the set of main railroad tracks; thence southerly, 10 feet easterly from and parallel with said railroad tracks the following courses and distances:

1. South $00^{\circ}22'50''$ East, 136.84 feet
2. a curve concave to the east, having a radius of 592.36 feet, a central angle of $8^{\circ}18'15''$, and an arc length of 85.85 feet;
3. South $08^{\circ}41'05''$ East, 609.91
4. a curve concave to the northeast having a radius of 992.36 feet, a central angle of $11^{\circ}58'02''$, and an arc length of 207.27 feet;
5. South $20^{\circ}39'07''$ East, 118.16 feet;
6. a curve concave to the west having a radius of 337.64 feet, a central angle of $2^{\circ}02'02''$ and an arc length of 11.98 feet, to a point that bears North $31^{\circ}33'27''$ East, 2560.85 feet from the southwest corner of said Section 31; thence leaving said parallel line North $89^{\circ}29'32''$ East, 71.56 feet to an existing cyclone fence, said fence being 9 feet west of the west line of property described in Grant Deed Document Number 2008-0012789, Official Records of Stanislaus County; thence along said fence line North $00^{\circ}29'58''$ West, parallel with and 9 feet west of said west line of Grant Deed, 1148.76 feet to the northeast corner of said cyclone fence; thence continuing along said fence South $89^{\circ}32'28''$ West, 259.43 feet to the Point of Beginning.

Containing 5.17 acres

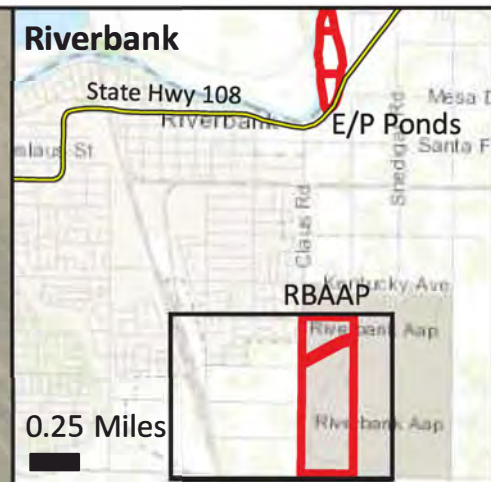
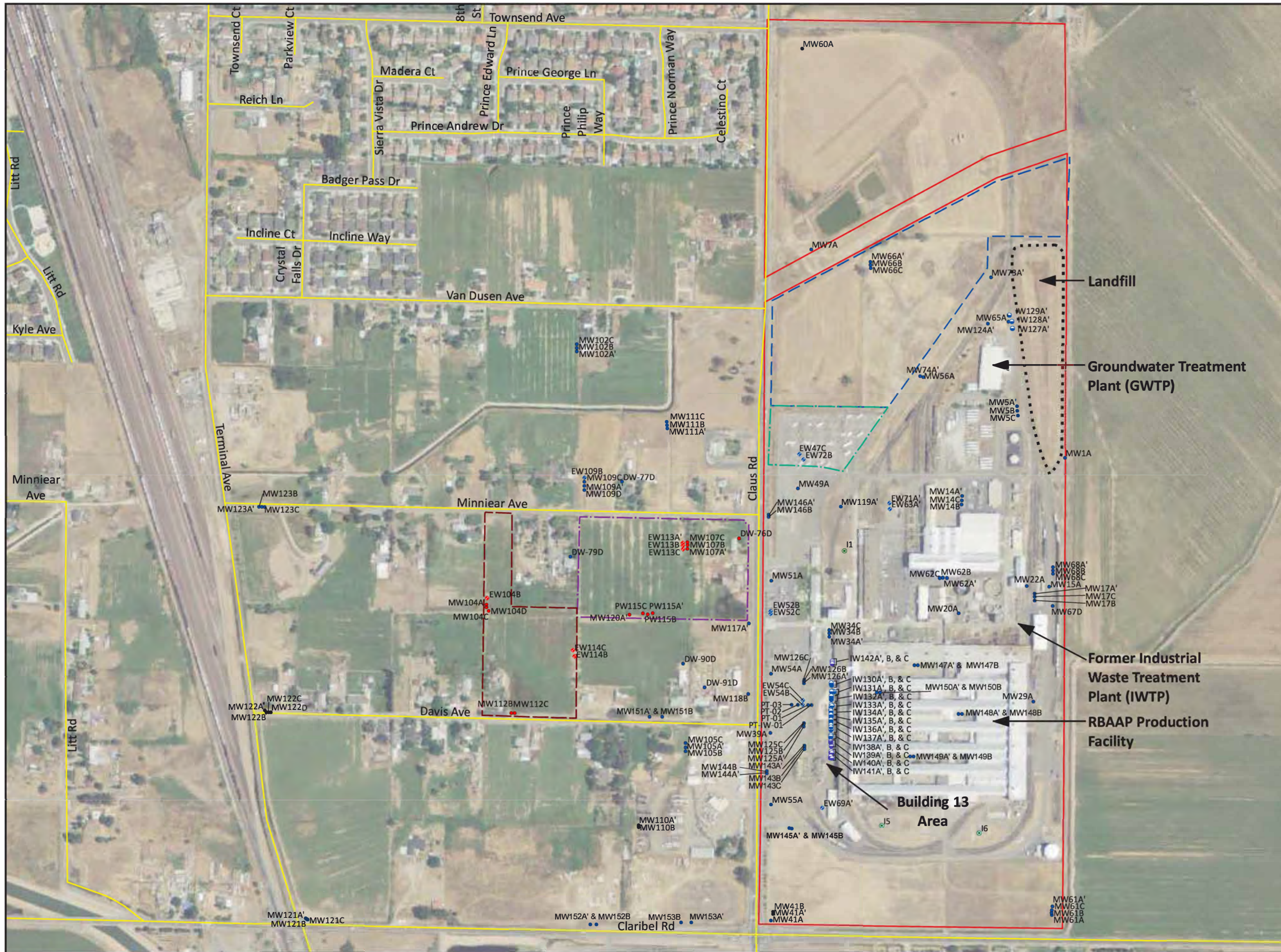
APN: 062 031 005 (portion)

The above described Parcel being subject to all easements and rights of way of record including, but not limited to overhead power lines and also rights for drainage using existing facilities along the western boundary line. Said existing drainage facilities may be in use by others and may be nonexclusive in nature.

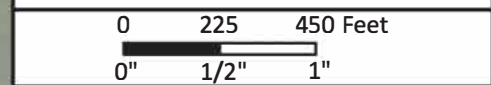


October 23, 2018

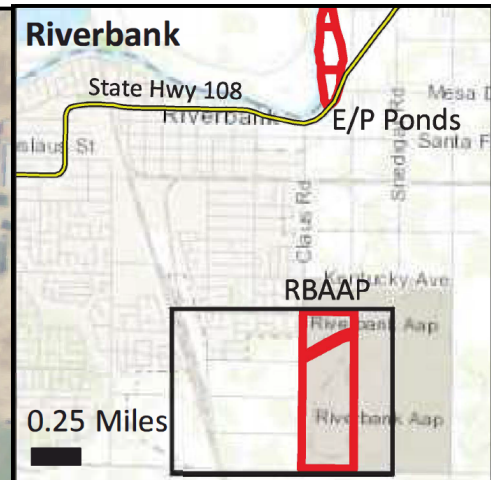
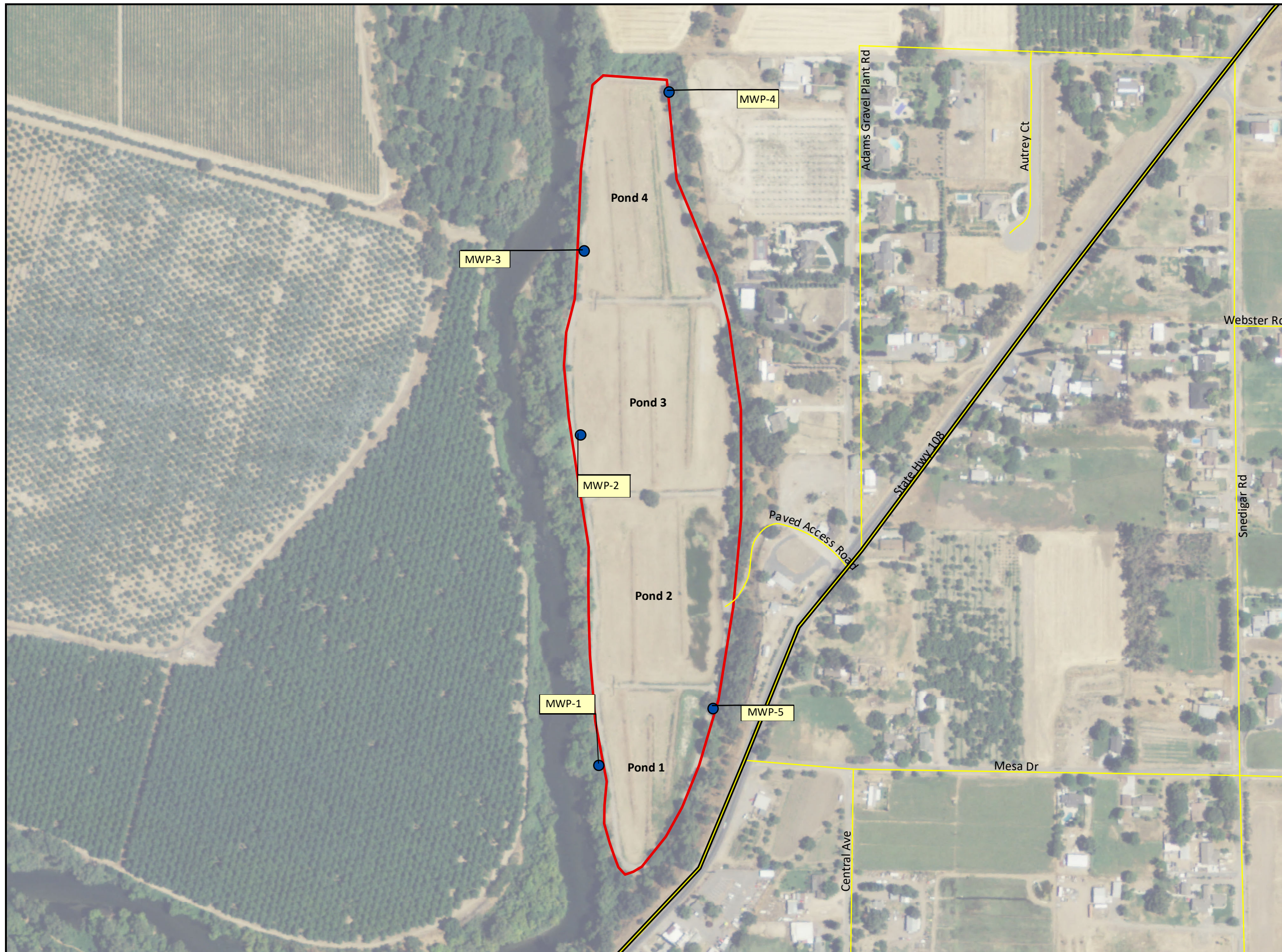
A handwritten signature in black ink, appearing to read "David Lee Harris", written over the bottom portion of the professional seal.



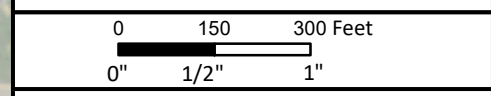
- Notes:**
- Monitoring Well
 - ⊕ Extraction Well
 - ⊕ Inaccessible Monitoring Well
 - ⊕ Inaccessible Extraction Well
 - ⊕ Injection Well
 - ⊕ Production Well
 - Streets
 - Highways
 - ▭ RBAAP Boundary
 - ⋯ Landfill Boundary
 - ▭ Parcel 2
 - ▭ Parcel 2A
 - ▭ APN 075023007
 - ▭ APN 075023005



Well Location Map

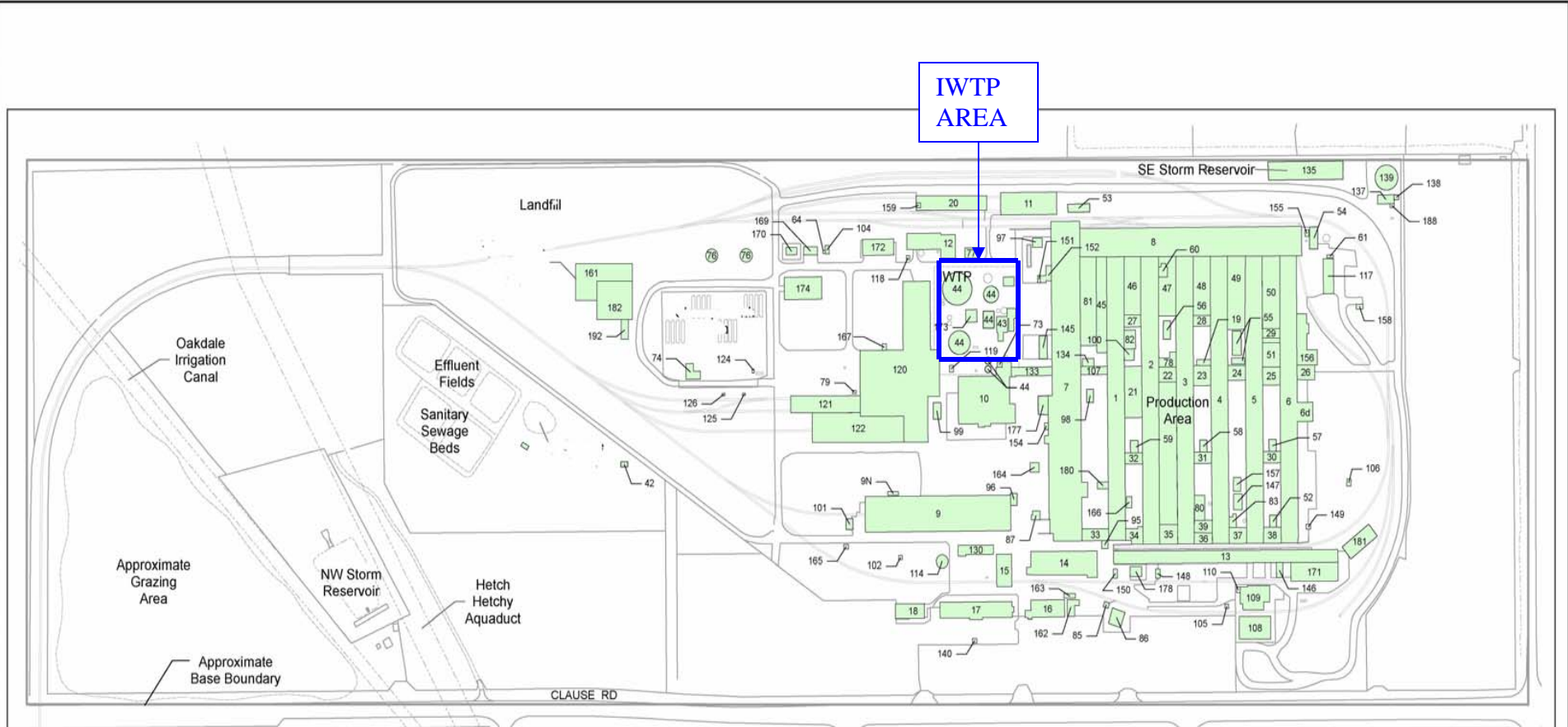


- Notes:**
- Monitoring Well
 - Highways
 - Streets
 - Evaporation/Percolation Pond Boundary (approximate; not a product of survey)



Evaporation/Percolation Pond Map

Ahtna **6** Figure



Legend:

- Approximate Boundary of the IWTP Site (SWMU-1) Defining Area Subject to ROD contingency and RCRA Part B Permit**
- Buildings**

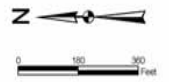


FIGURE 7
RBAAP Former
IWTP Site

EXHIBIT J-1

ENVIRONMENTAL PROTECTION PROVISIONS

1. USE OF THE PROPERTY

The sole purpose for which premises and improvements thereon may be used, absent written approval from the Lessor for any other use, is for commercial/industrial use.

2. SUBSEQUENT TRANSFERS

The Lessee shall neither transfer nor assign this lease or any interest therein or any property on the leased premises, nor sublet the leased premises or any part thereof or any property thereon, nor grant any interest, privilege, or license whatsoever in connection with this lease without the prior written consent of the Lessor. Such consent shall not be unreasonably withheld or delayed. Every lease or sublease shall contain the environmental protection provisions contained herein.

3. REGULATORY OR ENVIRONMENTAL PERMITS

The Lessee shall be solely responsible for obtaining at its own cost and expense any regulatory or environmental permits required for its operation under the lease, independent of any existing Riverbank Army Ammunition Plant ("RBAAP") permits. The Lessee shall also be required to obtain its own EPA Identification Number, if applicable. Permits that may be required include Stormwater Pollution Prevention Plans or permits under the National Pollutant Discharge Elimination System, construction permits, or other Federal, State, or local permits.

4. LESSEE COMPLIANCE

The Lessee shall comply with all lawful statutes, regulations, permits, or orders affecting the activity hereby authorized when such are issued by the Environmental Protection Agency; the California Department of Toxic Substances Control ("DTSC"); the Regional Water Quality Control Board Central Valley Office ("RWQCB"); or any other Federal, State, interstate, or local government agency having jurisdiction to abate or prevent pollution. The disposal of any toxic or hazardous materials within the leased premises by the Lessee or any sublessee is prohibited.

5. INTERFERENCE WITH ON-GOING ENVIRONMENTAL REMEDIATION

The Lessee shall not disrupt, inflict damage, obstruct, or impede on-going environmental restoration work on the leased premises or anywhere else on RBAAP. The Lessee shall indemnify the Government for any costs incurred as a result of Lessee's breach of this provision.

6. LESSOR ACCESS CLAUSE

The Lessor's rights under this Lease specifically include the right of the Lessor to inspect, upon reasonable notice, the Leased Premises for compliance with environmental, safety, and occupational health laws and regulations, whether or not the Lessor is responsible for enforcing them. Such inspections are without prejudice to the right of duly constituted enforcement officials to make such inspections. The Lessor normally will give the Lessee twenty-four (24) hours prior notice of its intention to enter the leased premises unless it determines the entry is required for safety, environmental, operations, or security purposes. The Lessee shall have no claim against the United States or any officer, agent, employee, or contractor thereof on account of any entries.

7. FEDERAL FACILITY AGREEMENT AND HAZARDOUS WASTE FACILITY PERMIT

The Lessor acknowledges that the RBAAP is on the National Priorities List ("NPL") under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA" 42 U.S.C. §9601 et. seq.), as amended. The Lessor also acknowledges that RBAAP had been issued a Hazardous Waste Facility Permit by the DTSC. The Lessee acknowledges that the Lessor has provided a copy of the RBAAP Federal Facility Agreement ("FFA"), dated April 5, 1990, the Hazardous Waste Facility Permit, dated May 6, 2006, and any subsequent modifications to both documents. For so long as the Property remains subject to the FFA and any permits, the Lessee, its successors and assigns, agree that they will not interfere with the United States Department of the Army activities required by the FFA and any permits. In addition, should any conflict arise between the FFA and any permits, as they presently exist or may be amended, and the lease provisions, the FFA provisions shall take precedence. The Lessee further agrees that notwithstanding any other provision of the Lease, the Lessor assumes no liability to the Lessee should implementation of the FFA or any permits interfere with the Lessee's use of the Leased Premises. The Lessee shall have no claim on account of any such interference against the United States or an officer, agent, employee or contractor thereof, other than for abatement of rent.

8. CERCLA ACCESS CLAUSE

The Lessor and its officers, agents, employees, contractors, subcontractors, and state and federal regulatory officials shall have the right, upon reasonable notice to the Lessee, to enter upon the Leased Premises in any case in which a response or corrective action is found to be necessary, or is in progress on the Leased Premises, or such access is necessary to carry out a response or corrective action on adjoining property. Right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, test-pitting, installing monitoring or pumping wells, or other treatment facilities, response action, corrective action, or any other action necessary for the Lessor to meet its responsibilities under applicable laws and as provided for in this Lease.

9. LESSEE COMPLIANCE DURING RESPONSE OR CORRECTIVE ACTION

The Lessee agrees to comply with the provisions of the appropriate health or safety plan in effect during the course of any of the above-described actions. Any inspection, survey, investigation, or other corrective or response action will, to the extent practicable, be coordinated with representatives designated by the Lessee or any sublessees. The

Lessee and sublessees shall have no claim, on account of such entries, against the United States or any officer, agent, employee, contractor, or subcontractor thereof. In addition, the Lessee and any sublessees shall comply with all the applicable Federal, State, and local occupational safety and health regulations.

10. ENVIRONMENTAL COMPLIANCE PLANS

The Lessee shall submit to the Lessor, and maintain thereafter, an Environmental Compliance Plan which describes, in detail, the program for environmental management and method of compliance, by the user of any portion of the Leased Premises, whether Lessee, with all Lessor, Federal, State, and local laws and regulations for the use, management, generation, storage, treatment, and disposal of all hazardous waste, hazardous materials, and hazardous substances. Each Environmental Compliance Plan for a portion of the Leased Premises, or request for waiver of the requirement for a plan due to the non-hazardous nature of the proposed use, must be submitted and approved in writing by the Lessor prior to occupancy of the intended portion of the Leased Premises. Thereafter, each such Environmental Compliance Plan shall be incorporated in the Lease, and shall be included as an exhibit in the relevant sublease(s). The Lessee shall be responsible for the overall compliance of its operations. The Lessee shall be responsible for ensuring the preparation of all documents, records, and reports associated with the environmental compliance of its operation. No liability or responsibility shall attach to the Leased Premises or the Lessor as a result of the Lessor's review and approval of the Environmental Compliance Plan under this paragraph.

The Lessee further agrees that in the event of any assignment or sublease of the Leased Premises, it shall provide to the EPA Region 9, the DTSC, and the RWQCB Central Valley Office a copy of the assignment or sublease of the Leased Premises, by certified mail, within fourteen (14) days after the effective date of such transaction. The Lessee may delete the financial terms and any other propriety information from the copy of any assignment or sublease furnished pursuant to this condition.

11. LAND USE RESTRICTIONS

- a. The United States Department of the Army has undertaken careful environmental study of the Leased Premises and concluded that the land use restrictions set forth below are required to ensure protection of human health and the environment. The Lessee shall not undertake nor allow any activity on or use of the Leased Premises that would violate the land use restrictions contained herein.
 - i. **Residential Use Restriction.** The Lessee shall not use the Leased Premises for residential purposes. For purposes of this provision, residential use includes, but is not limited to: single family or multi-family residences; childcare facilities; nursing home or assisted living facilities; and any type of educational purpose for children/young adults in grades kindergarten through 12.
 - ii. **Groundwater Restriction.** Lessee is hereby informed and acknowledges that the groundwater under the Leased Premises has contamination consisting of hexavalent chromium, total chromium (all

valence states) and cyanide at levels exceeding the remediation level State Drinking Water Maximum Contaminant Level. The Lessee shall not access or use groundwater underlying of the Leased Premises for any purpose without the prior written approval of the United States Department of the Army, the U.S. EPA Region 9, the DTSC, and the RWQCB Central Valley Region. For the purposes of this restriction, "groundwater" shall have the same meaning as in §102(12) of CERCLA.

- iii. **Notice of Groundwater Monitoring Wells.** The Lessee is hereby informed and does acknowledge the presence of approximately 150 groundwater monitoring wells, injection wells, and extraction wells on the Leased Premises. The Lessee shall not disturb or permit others to disturb the wells on the Leased Premises without prior written approval from the Lessor, the U.S. EPA Region 9, the DTSC, and the RWQCB Central Valley Region. Upon the Lessor's determination that a well is no longer necessary, the Lessor will close such well at the Lessor's sole cost and expense in accordance with applicable laws, regulations, and ordinances.
 - iv. **Excavation and Development Restrictions.** The Lessee shall not conduct or permit others to conduct any excavation activities (i.e. digging, drilling, or any other excavation or disturbance of the land surface or subsurface) at the former Industrial Wastewater Treatment Plant ("IWTP"), or any other activities that may damage the IWTP cover, without prior written approval of the Lessor, the U.S. EPA Region 9, the DTSC, and the RWQCB Central Valley Region. The IWTP is a closed former Resource Conservation and Recovery Act site. The regulatory prescribed remedy at the IWTP (cover) shall remain in place. Any damage to this cover shall be promptly repaired. Any proposed alteration to the cover requires Lessor approval prior to execution of the alteration. No subsurface activities shall be permitted within the IWTP area.
 - v. **Landfill Restriction.** The Lessee shall not conduct or permit others to conduct any excavation activities (i.e. digging, drilling, or any other excavation or disturbance of the land surface or subsurface) at the landfill, or any other activities that may damaged the RBAAP Landfill soil cover and liner. The Lessee or any approved contractor, shall not construct, make, or permit any alterations, additions, or improvements to the landfill in any way that may violate this restriction. The Lessor will be notified of any breach of the landfill cover within twenty-four (24) hours. The Lessee and any sublessee will take immediate steps to control access to such breach and begin corrective measures to restore the landfill cover.
- b. **Modifying Restrictions.** Nothing contained herein shall preclude the Lessee from undertaking, in accordance with all applicable laws and regulations and without any cost to the Lessor, such additional action necessary to allow for other less restrictive use of the Leased Premises. Prior to such use of the Leased Premises, the Lessee shall consult with and obtain the prior written approval of the Lessor, the U.S. EPA, the DTSC, and the RWQCB Central Valley Region. Upon the Lessee's obtaining these approvals, the Lessor agrees to revise the lease.

c. **Submissions.** The Lessee shall submit any requests for modifications to the above restrictions to the Lessor, the U.S. EPA, the DTSC and the RWQCB Central Vally Region, by first class mail, postage prepaid, and addressed as follows:

- i. Lessor: 1325 J Street, Sacramento, California 95814
ATTN: Chief, Real Estate Division
- ii. U.S. EPA Region IX: 75 Hawthorne Street, (SFD-8-3); San Francisco, CA 94105
Attn: Xuan-Mai Tran
- iii. DTSC: 8800 Cal Center Drive; Sacramento, CA 95826-3200
Attn: Shahid Mahmood
- iv. CV-RWQCB: 11020 Sun Center Drive, Suite 200; Rancho Cordova, CA 95670-6114
Attn: Nate Manley

12. HAZARDOUS WASTE MANAGEMENT

The Lessee is only authorized to store hazardous materials on the Leased Premises in accordance with the February 2, 2026 Authorization of Waiver to Store Non-Department of War Owned Hazardous Materials at the Former Riverbank Army Ammunition Plant Per 10 U.S.C. §2692(b)(9). The Lessee shall strictly comply with hazardous waste management requirements under RCRA and the State of California Hazardous Waste Management Rules, including proper hazardous waste characterization, labeling, storage, disposal, and documentation requirements. Except as specifically authorized by the Lessor in writing, the Lessee must provide, at its own expense, such hazardous waste management facilities, as needed to maintain compliance with all laws and regulations. Lessor hazardous waste management facilities shall not be available to the Lessee.

13. EXISTING HAZARDOUS WASTE

The Lessee shall not use RBAAP hazardous waste accumulation points. Neither shall the Lessee permit its hazardous wastes to be commingled with the Lessor's hazardous waste.

14. LESSEE RESPONSE PLAN

The Lessee shall submit to the Lessor, and maintain thereafter, a plan for responding to hazardous waste, fuel, and other chemical spills prior to commencement of operations on the Leased Premises. Such plan shall be independent of the Lessor's Spill Contingency Plan and, except for initial fire response and/or spill containment, shall not rely on use of RBAAP installation personnel or equipment. Should the Lessor provide any personnel or equipment, whether for initial fire response and/or spill containment, or otherwise on request of the Lessee, or because the Lessee was not, in the opinion of the Lessor, conducting timely cleanup actions, the Lessee agrees to reimburse the Lessor for its response costs.

15. ALTERATIONS, ADDITIONS AND IMPROVEMENTS TO THE LEASED PREMISES

The Lessee shall not construct, make or permit any alterations, additions, or improvements to the Leased Premises in any way which may adversely affect the Lessor's investigations, restoration, or human health or the environment without prior written consent of the Lessor. Such consent may include a requirement to provide the Lessor with a performance and payment bond and such other requirements as may be deemed necessary to protect the interests of the Lessor. Except as such written approval shall expressly provide otherwise, all such approved alterations/additions/modifications shall become the Lessor's property when annexed to the Leased Premises.

16. NOTICE OF THE PRESENCE OF ASBESTOS AND COVENANT

- a. The Lessee is hereby informed and does acknowledge that friable and non-friable asbestos or asbestos-containing materials ("ACM") have been found on the Leased Premises, as described in the *Asbestos Recertification Survey Report, Riverbank Army Ammunition Plant, Riverbank, California*. Prepared for U.S. Army Corps of Engineers, Sacramento District, Sacramento, CA by Ahnta Global, LLC, Pleasant Hill, CA 94523. To the best of the Lessor's knowledge, the ACM on the Leased Premises does not currently pose a threat to human health or the environment.
- b. In addition to the Lessee's general indemnity contained in Condition No. 16, titled "Indemnity and Hold Harmless," above, the Lessee covenants and agrees that its use and occupancy of the Leased Premises shall comply with all applicable laws relating to asbestos and ACM. The Lessee similarly covenants and agrees that the Lessor assumes no liability for future remediation of asbestos, or for damages for personal injury, illness, disability, or death of the Lessee, its sublessees, successors or assigns, or any other person, including members of the general public, arising from, in incident to, the lease, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with asbestos on the Leased Premises during the duration of the Lease and to be responsible for any future remediation or abatement of any asbestos hazard found to be necessary on the Leased Premises.
- c. The Lessee acknowledges that it has inspected or has had the opportunity to inspect the Leased Premises as to its asbestos and ACM content and condition, and any hazardous or environmental conditions relating thereto. The Lessee shall be deemed to have relied solely on its own judgement in assessing the overall condition of all or any portion of the Leased Premises, including, without limitation, any asbestos or ACM hazards or concerns.

17. NOTICE OF THE PRESENCE OF LEAD-BASED PAINT AND COVENANT AGAINST THE USE OF THE PROPERTY FOR RESIDENTIAL PURPOSES

- a. The Leased Premises do not contain residential housing and are not being leased for residential purposes. The Lessee is notified that the Leased Premises contain buildings built prior to 1978 that contain lead-based paint ("LBP"). Exposure to lead from LBP may place young children at risk of developing lead

poisoning. Lead poisoning in young children may result in permanent neurological damage, including learning disabilities, reduced intelligence quotient, behavioral problems, and impaired memory. A risk assessment or inspection by Lessee for possible LBP hazards is recommended prior to its execution of this lease.

- b. Information concerning known LBP and/or LBP hazards, a list of the location of LBP and/or LBP hazards, and a chart showing the condition of painted surfaces are contained in the Environmental Condition of Property Update (2026), attached hereto as Exhibit E-1 and previously provided to the Lessee. Additionally, the Lessee has been provided a copy of the federally-approved pamphlet on lead poisoning prevention. The Lessee hereby acknowledges receipt of all the information described in this paragraph.
- c. The Lessee acknowledges that it has had the opportunity to conduct a risk assessment or inspection for the presence of LBP and/or LBP hazards prior to execution of this Lease.
- d. The Lessee shall not permit use of any existing buildings or structures on the Leased Premises for residential habitation.

18. PCB NOTIFICATION AND COVENANT

- a. The following PCB-Containing equipment is located on the Leased Premises: electrical transformers and large industrial presses. This equipment is in operation, properly labeled in accordance with federal and state regulations, but have been determined to be in poor condition. A list of electrical transformers containing PCBs in excess of 50 parts per million ("ppm") is presented in Exhibit G-1 hereto. In addition, PCBs are present in the paint and coating on the exterior siding of several buildings.
- b. Sampling results have detected PCBs above Toxic Substance Control Act ("TSCA") criteria in several locations within and adjacent to buildings in the main plant area of the RBAAP facility and within the soils of Parcels 1 and 1A. The Lessor and Lessee are undergoing remediation to address these PCB releases.
- c. If the Lessee causes, creates or exacerbates a release of PCBs from any equipment located within the Leased Premises the Lessee agrees to undertake any and all necessary abatement or remediation costs at its sole expense.

19. "AS IS"

The Lessee acknowledges that it has inspected or has had the opportunity to inspect the Leased Premises and accepts the condition and state of repair of the Leased Premises. The Lessee understands and agrees that the Leased Premises and any part thereof is leased "AS IS" without any representation, warranty, or guarantee by the Lessor as to quantity, quality, title, character, condition, size, or kind, or that the same is in condition or fit to be used for the purpose(s) intended by the Lessee, and no claim for allowance or deduction upon such grounds will be considered.

No warranties, either express or implied, are given with regard to the condition of the Leased Premises, including, without limitation, whether the Leased Premises does or does not contain asbestos, lead-based paint, or PCB-containing equipment. The Lessee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Leased Premises, including, without limitation, any asbestos, lead-based paint, PCB-containing equipment or other conditions on the Lease Premises. The failure of the Lessee to inspect, or to exercise due diligence to be fully informed as to the condition of all or any portion of the Leased Premises, will not constitute grounds for any claim or demand against the Lessor.

Nothing in this "AS IS" provision will be construed to modify or negate the Lessor's obligation under CERLCA or any other statutory obligations.

20. HOLD HARMLESS

To the extent authorized by law, the Lessee, its successors and assigns, covenant and agree to indemnify and hold harmless the Lessor, its officers, agents, and employees from: (1) any and all claims, damages, judgments, losses, and costs, including fines and penalties, arising out of the violation of the Environmental Protection Provisions in this Lease by the Lessee, its successors and assigns; and (2) any and all claims, damages, and judgments arising out of, or in any manner predicated upon, human exposure to asbestos, lead-based paint, PCB-containing equipment, or other condition on any portion of the Leased Premises after the Effective Date of this Lease.

The Lessee, its successors and assigns, covenant and agree that the Lessor shall not be responsible for any costs associated with modification or termination of the Environmental Protection Provisions in this Lease, including without limitation, any costs associated with additional investigation or remediation of asbestos, lead-based paint, PCB-containing equipment or other condition on any portion of the Property.

Nothing in this Hold Harmless provision will be construed to modify or negate the Lessor's obligation under CERCLA or any other statutory obligation.

CA Drinking Water Watch

Links

Water System Details

[PS Code Transition](#)

[Water System Details](#)

[Water System Facilities](#)

[Monitoring Schedules](#)

[Monitoring Results](#)

[Monitoring Results By Analyte](#)

Lead And Copper Sampling

[Violations/Enforcement Actions](#)

[Site Visits](#)

Consumer Confidence Reports

Lead Service Line Documents

Return Links

[Water System Search](#)

[County Map](#)

[Glossary](#)

[Contact Info](#)

Water System No. :	CA5000211	Federal Type :	NTNC
Water System Name :	RIVERBANK LRA	State Type :	NTNC
Principal County Served :	STANISLAUS	Primary Source :	GW
Status :	A	Activity Date :	03-22-1979
Distribution System Classification :	D1	Max Treatment Plant Classification :	TD

Water System Contacts			
Type	Address	Phone	Email - Web Address
Physical Location Contact	CA5000211- RIVERBANK LRA 5300 CLAUS RD STE 1 RIVERBANK CA 95357	There is no phone	There is no email address. There is no web address.
Administrative Contact	6707 Third Street RIVERBANK CA 95367	209-869-7128	cbridgewater@riverbank.org

Division of Drinking Water District / County Health Dept. Info

Name	Phone	Email	Address
DISTRICT 10 - STOCKTON	209-948-7696	dwpdist10@waterboards.ca.gov	31 E. CHANNEL STREET ROOM 270 STOCKTON CA 95202

Annual Operating Periods & Population Served

Service Connections

Start Month	Start Day	End Month	End Day	Population Type	Population Served	Type	Count	Meter Type	Meter Size Measure
1	10	12	31	NT	156				
						AG	0	ME	0
						AG	0	UM	0
						CM	0	ME	0
						CM	0	UM	0
						IN	8	ME	0
						IN	16	UM	0
						RS	0	ME	0
						RS	0	UM	0

Sources of Water

Service Areas

Name	Type Code	Status
WELL NO. 01 - STANDBY	WL	A
WELL NO. 05	WL	A
WELL NO. 06	WL	A

Code	Name
NT	INDUSTRIAL/AGRICULTURAL

Water Purchases

Seller Water System No.	Water System Name	Seller Facility Type	Seller State Asgn ID No.	Buyer Facility Type	Buyer State Asgn ID No.
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