

**LAND CLEARANCE FOR REDEVELOPMENT AUTHORITY
OF THE COUNTY OF ST. LOUIS**

PCB REMEDIATION OF THE MET CENTER PROJECT

REQUEST FOR PROPOSALS AND CONTRACT DOCUMENTS

**MET Center
6347 Plymouth Avenue
Wellston, Missouri 63133**

**PROJECT MANUAL
VOLUMES 1 THROUGH 3**

**For:
Land Clearance for Redevelopment Authority
120 S. Central Avenue, Suite 200
St. Louis, MO 63105**

**Owner's Environmental Consultant:
Environmental Works, Inc.
Attn: Ed Creaden, Principal Scientist
ecreaden@environmentalworks.com
816.285.8447**

**Contract Type:
Time-and-Materials with Not-to-Exceed Totals by Phase**

**Date of Issue:
Thursday, August 20, 2026**

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ATTACHMENT 1 - PROJECT INFORMATION

PROJECT: PCB Remediation of the MET Center
40 CFR §761.61(c) Risk-Based Cleanup Implementation
6347 Plymouth Avenue, Wellston, MO 63133

OWNER: Land Clearance for Redevelopment Authority
Attn: Josh Ayers, Chief Financial Officer
JAyers@stlpartnership.com
314.615.7674
120 S. Central Ave., Suite 200
St. Louis, MO 63105

**OWNER'S ENVIRONMENTAL
CONSULTANT / OWNER'S
TECHNICAL REPRESENTATIVE FOR
PCB REMEDIATION** Environmental Works, Inc.
Attn: Ed Creaden, Principal Scientist
ecreaden@environmentalworks.com
816.285.8447

REGULATORY AUTHORITY: United States Environmental Protection Agency
Region 7 – TSCA Program
11201 Renner Boulevard
Lenexa, KS 66219

**GOVERNING TECHNICAL
DOCUMENT:** EPA-Approved 40 CFR §761.61(c) Risk-Based Cleanup
and Disposal Application (January 12, 2026) Volume 3,
Exhibit A of this RFP

CONTRACT TYPE: Time-and-Materials with Not-to-Exceed
(T&M NTE) Totals by Phase

EVALUATION METHOD: Best-Value Selection
(Qualifications-weighted; cost at 20% of
100-point evaluation score)

FUNDING: The Project is funded in whole or in part by EPA
Brownfields funding and other Owner-identified funding
sources. All applicable federal funding requirements,
including Davis-Bacon Act requirements, apply to the
Work. The applicable Davis-Bacon wage determination
is attached in Appendix F-1.]

ADVERTISING DATE: **Thursday, August 20, 2026**

ATTACHMENT 2 - ADVERTISEMENT FOR BIDS

LEGAL NOTICE ADVERTISEMENT FOR BIDS

The Land Clearance for Redevelopment Authority for the County of St. Louis (the "LCRA") will accept proposals from qualified firms for PCB remediation services at the MET Center, located at 6347 Plymouth Avenue, Wellston, Missouri 63133 (the "Project"). The Project involves the implementation of a facility-wide PCB remediation program under the EPA-approved 40 CFR §761.61(c) Risk-Based Cleanup and Disposal Application. The Work includes removal and treatment of PCB-impacted coatings, sealants, porous substrates, and dust reservoirs; HVAC cleaning and protection; verification sampling; waste management and disposal under TSCA; and documentation supporting institutional controls and long-term operations and maintenance. The building will remain partially occupied during the Work.

The Project is funded in whole or in part by EPA Brownfields funding and other Owner-identified funding sources. Federal funding requirements, including applicable Davis-Bacon Act requirements and the Davis-Bacon wage determination, are included in Appendix F.

Interested firms or joint ventures should submit one (1) original and two (2) copies of their fully completed and signed Bid Proposal, along with all required documentation in a sealed envelope marked "**CONFIDENTIAL: Proposal for MET Center PCB Remediation Services**" to:

**Land Clearance for Redevelopment Authority
120 S. Central Ave., Suite 200
St. Louis, MO 63105
Attn: Josh Ayers, Chief Financial Officer**

Proposals are due by **3 PM CST on Friday, September 11, 2026**. No award of contract will be made at proposal opening.

There will be one (1) mandatory pre-bid meeting and site visit, scheduled for **2:30 PM (CT) on Wednesday, August 26, 2026**, at the Project site. Attendance is required as a condition of bid eligibility. Any bidder who has special needs addressed by the Americans with Disabilities Act should notify the Owner at the contact information listed in the RFP before the pre-bid meeting.

The Request for Proposals may be obtained at <https://stlpartnership.com/rfp-rfqs/>. All questions shall be submitted in writing by email simultaneously to Sarah Kroner, skroner@stlpartnership.com, Josh Ayers, jayers@stlpartnership.com, and Ed Creaden, ecreaden@environmentalworks.com, no later than **1 PM CT on Friday, August 28, 2026**. Bidders shall not rely on oral responses. Only written addenda issued by the Owner shall modify the Contract Documents.

Bidders must demonstrate experience with TSCA PCB cleanup projects involving building-material PCBs under 40 CFR Part 761, including risk-based cleanup experience under 40 CFR §761.61(c).

The LCRA actively encourages submission of proposals from disadvantaged business enterprises and companies owned by minorities, women, immigrants, and veterans. The LCRA does not discriminate on the basis of race, color, religion, creed, sex, sexual orientation, gender identity, age,

ancestry, national origin, disability, or veteran status in consideration of this award. Equal Opportunity Employer.

The LCRA reserves the right to reject any or all proposals, to waive informalities or irregularities in any proposal, and to negotiate with any firm. The LCRA is not obligated to accept the lowest-cost proposal. Award, if made, will be to the most responsive and responsible proposer based on the evaluation criteria described in the Request for Proposals.

Published: August 20, 2026

Land Clearance for Redevelopment Authority by:



Howl Bean II, Assistant Secretary

ATTACHMENT 3 - INSTRUCTIONS TO BIDDERS

Section A - Request for Proposals and Description of Project

A.1 Request for Proposals

The Land Clearance for Redevelopment Authority for the County of St. Louis (LCRA), in coordination with the St. Louis Economic Development Partnership, is issuing this Request for Proposals (RFP) to procure qualified services to implement the Metropolitan Education and Training (MET) Center PCB cleanup project located at 6347 Plymouth Avenue, Wellston, St. Louis County, Missouri.

For purposes of this Contract 'Owner's Environmental Consultant' and 'Owner's Technical Representative for PCB Remediation' mean Environmental Works, Inc. (EWI), acting as the Owner's designated technical representative for review of PCB remediation submittals, verification documentation, waste-management documentation, and Cleanup Plan implementation records. EWI is not the Contractor, Construction Manager, or designer of contractor means and methods, and EWI does not assume responsibility for contractor health and safety programs. This RFP solicits proposals from qualified contractors to perform PCB remediation and associated compliance documentation consistent with the controlling project cleanup framework described in Exhibit A.

A.2 Project Purpose and Cleanup Framework

The project will implement the MET Center Risk-Based Cleanup and Disposal Application (Cleanup Plan), dated January 12, 2026, as approved by the United States Environmental Protection Agency (EPA) under 40 CFR §761.61(c), including EPA approval conditions issued for the project prior to publication of this RFP.

The Cleanup Plan addresses PCB-impacted building materials, dust reservoirs, and indoor air using a risk-based approach with defined performance endpoints, verification requirements, waste management routing, and long-term management commitments.

The Cleanup Plan is structured using EPA's PCB FAST Toolkit, Tool 4 (TSCA Risk-Based PCB Cleanups Checklist), to support EPA review and implementation traceability.

A.3 MET Center Facility Overview

The MET Center consists of a multi-story office tower, a warehouse complex that includes High Bay, Low Bay, and Diesel Shop areas, and a separate North Tower structure. Current operations are limited to adult training, family services and administrative functions within portions of the office tower. The warehouse bays are currently restricted to controlled access for maintenance and investigation activities only. The North Tower is not used and is proposed to remain permanently closed to occupancy, with access limited to inspections needed to maintain physical security and exterior coating integrity.

A.4 Summary of PCB Conditions and Cleanup Scope

PCBs are present in and on certain building materials and associated dust reservoirs at the MET Center, and indoor air is evaluated within the risk-based cleanup framework. The Cleanup Plan focuses active cleanup on PCB-impacted building materials and dust in areas relevant to current and planned building use, and it uses verification and documentation to confirm that cleanup outcomes meet defined acceptance criteria.

This RFP is issued to procure a Contractor to implement the Cleanup Plan requirements and deliver the documentation required to support verification, waste management, and closeout.

A.5 Performance-Based Contract Approach

This procurement is performance-based. The contract will define required outcomes, including achievement of Cleanup Plan performance endpoints and completion of required verification and documentation packages. The RFP does not prescribe detailed Contractor means and methods, provided the Contractor's selected means and methods comply with TSCA (40 CFR Part 761, including §761.60, §761.61, §761.62, and Subpart N as applicable), OSHA, NESHAP, and other applicable requirements and remain within the Cleanup Plan framework and EPA approval conditions.

The selected Contractor is responsible for selecting and implementing compliant means and methods to achieve the required performance outcomes and for producing the project records required for regulatory compliance and closeout.

The pricing format for this procurement uses time-and-materials billing with phase-level not-to-exceed totals, fixed billing rates, defined unit prices, and Owner authorization requirements. This structure is intended to allow proposers to price specialized TSCA remediation work, verification-driven turnover requirements, waste-management variables, and field-condition contingencies without requiring the Owner to prescribe contractor means and methods. No work may exceed an approved phase NTE amount without prior written authorization from the Owner.

A.6 General Scope Summary

The scope of this procurement is to implement the EPA-approved MET Center Cleanup Plan, including any EPA approval conditions. The Cleanup Plan is incorporated by reference as the governing technical document for this procurement (Volume 3, Exhibit A), including the EPA approval letter and any EPA approval conditions. This RFP does not modify the Cleanup Plan, its decision logic, or its endpoints.

This procurement is performance-based. The Contractor is responsible for selecting means and methods that achieve the required performance outcomes and documentation deliverables, provided the Contractor's means and methods comply with TSCA (40 CFR Part 761, including §761.60, §761.61, §761.62, and Subpart N as applicable), OSHA, NESHAP, and applicable St. Louis County and Missouri requirements, and remain within the Cleanup Plan framework and EPA approval conditions.

Institutional controls (ICs) and long-term operations and maintenance (O&M) are Owner obligations; however, the Contractor shall support implementation by producing project documentation generated from the Contractor's Work that is required for closeout and Owner stewardship record inputs under the Cleanup Plan.

The MET Center will remain an active workforce training and administrative facility during portions of the Work. The Contractor shall plan and execute activities to maintain safe operations, controlled access, and occupant protection in coordination with the Owner and Owner's Environmental Consultant, consistent with the Cleanup Plan's work controls.

All cleanup acceptance criteria, Verification Unit (VU) decision logic and sampling requirements, exceedance response and re-verification rules, waste designation and disposal routing rules, and

closeout documentation gates are established in Volume 2 as the contract implementation framework for this procurement. Volume 2 implements the governing Cleanup Plan. If a conflict exists, the Cleanup Plan and any EPA approval conditions control.

A.6.1 Paints and Coatings (Category A/B/C/D Remedy Framework)

Performance Outcome

1. Remove, treat, or where eligible under the Cleanup Plan, encapsulate PCB-impacted coatings to achieve non-porous wipe and porous bulk acceptance criteria in areas proposed for turnover.
2. Manage coating wastes as PCB Bulk Product Waste or PCB Remediation Waste in accordance with the Cleanup Plan waste designation framework.

Controlling Requirements

Remedy selection framework (Categories A through D), acceptable methods, acceptance criteria, and verification requirements are established in Volume 2, Part V and Cleanup Plan Section 5.1 and Table 5-1. Waste classification and disposal requirements are established in Volume 2, Part VI.

A.6.2 Porous Substrates and Concrete Surfaces

Performance Outcome

1. Perform targeted abatement, repair, or removal of PCB-impacted concrete and masonry substrates in office tower and occupied zones to achieve bulk verification criteria.
2. Implement treatment methods consistent with Cleanup Plan Section 5.3 and the remedy selection framework.

Controlling Requirements

Acceptance criteria, sampling densities, and decision rules for porous substrates are established in Volume 2, Part V. Waste classification and disposal requirements for concrete and masonry debris are established in Volume 2, Part VI.

A.6.3 Expansion Joints, Sealants, and Caulks

Performance Outcome

1. Remove legacy PCB-containing manufactured products, including expansion joints, sealants, and caulks, to achieve complete physical removal of targeted PCB Bulk Product Waste.
2. Manage removed materials as PCB Bulk Product Waste under 40 CFR §761.62. Where product is separated from substrate prior to disposal, manage the contaminated substrate as PCB Remediation Waste under 40 CFR §761.61.

Controlling Requirements

Waste classification decision logic, the Project Bulk Product Rule, and disposal routing requirements are established in Volume 2, Part VI.

A.6.4 HVAC Systems and Dust Reservoir Controls

Performance Outcome

1. Clean existing HVAC components that will be retained and reused to achieve HVAC wipe acceptance criteria.
2. Clean overhead horizontal surfaces, duct tops, ledges, and other dust reservoir surfaces to achieve non-porous wipe acceptance criteria and prevent recontamination of verified areas.

Controlling Requirements

HVAC wipe and indoor air acceptance criteria, sampling densities, and (limited) seasonal monitoring requirements are established in Volume 2, Part V.

A.6.5 North Tower Managed Area

Performance Outcome

1. Confirm and document conditions of existing physical isolation and barriers for the North Tower; no active interior mechanical demolition is included in this procurement.
2. Provide documentation sufficient for the Owner to record an Environmental Covenant, Deed Notice, and O&M Plan for the North Tower.
3. Document North Tower closure conditions, exterior condition observations, and any Owner-directed managed-area exhibits required for IC/O&M support. Do not interpret this procurement to require adjacent-ground-soil verification or a zero-release guarantee unless separately defined and priced by the Owner.

Controlling Requirements

North Tower managed area requirements, IC instrument content, and O&M obligations are established in Volume 2, Parts VII and VIII, and Cleanup Plan Sections 3.3 and 10. North Tower conditions and data do not set cleanup standards for other building areas.

A.6.6 Warehouse Barriers and O&M Deliverables

Performance Outcome

1. Document conditions of existing engineered barrier (concrete cap) in warehouse areas (High Bay, Low Bay, Diesel Shop) sufficient to support the Owner's long-term O&M program.
2. Provide barrier condition assessment, and annual inspection checklist inputs for incorporation into the Owner's IC instrument and O&M program.

Controlling Requirements

Contractor documentation deliverables supporting the Owner's O&M program, including warehouse barrier documentation and annual inspection inputs, are established in Volume 2, Part VII.

A.6.7 Waste Management, Staging, and Decontamination

Performance Outcome

1. Classify, segregate, package, store, and dispose of all PCB waste streams generated by the Work in accordance with TSCA requirements and the Cleanup Plan.
2. Manage temporary waste storage areas in compliance with 40 CFR §761.65(c) standards.
3. Decontaminate staging areas and equipment to meet non-porous wipe criteria prior to demobilization.

Controlling Requirements

Waste classification decision logic, waste stream classification matrix, temporary storage standards, decontamination criteria, manifesting requirements, and the untested materials protocol are established in Volume 2, Part VI.

A.6.8 Health, Safety, and Cross-Contamination Controls

Performance Outcome

1. Implement engineering controls, administrative controls, and cross-contamination prevention measures sufficient to achieve zero regulatory safety violations and zero uncontrolled migration of PCB particulates outside managed zones.
2. Prepare and implement a site-specific HASP with task-specific JSAs.
3. Implement exposure monitoring, PPE, and multi-hazard coordination where suspect or confirmed asbestos-containing materials (ACM) or lead-based paint (LBP) are co-located with PCB-impacted materials.

Controlling Requirements

Minimum health, safety, and cross-contamination control requirements are established in Volume 2, Part VIII, Section 13.

Where suspect or confirmed ACM or LBP is implicated in the Work area, the EWI Hazardous Building Materials Report dated November 2025, provided in Volume 3, Exhibit B, shall be used for material identification, reported locations, and multi-hazard planning inputs for purposes of this Contract.

A.6.9 Greener Cleanup

Performance Outcome

1. Implement practicable energy, resource, and water conservation measures, as well as air quality and emissions controls, during execution.
2. Track and report greener cleanup performance metrics.

Controlling Requirements

Greener cleanup implementation areas and performance metrics are established in Volume 2, Part VIII, Section 14, and Cleanup Plan Section 8.

A.6.10 Contingency and Owner-Directed Items

Performance Outcome

1. Provide unit pricing for step-out concrete coring (exceedance response), supplementary wipe, bulk or air sampling (re-verification), and transport and disposal of unforeseen PCB Remediation Waste at concentrations equal to or greater than 50 mg/kg Total PCBs.
2. Provide pricing for trigger-based optional sampling contingencies if baseline assumptions are invalidated.

These items are Owner-authorized and will not be exercised without prior written authorization from the Owner. Unit pricing and contingency pricing shall be entered on Exhibit X-9 (Unit Price Schedule).

Controlling Requirements

Exceedance response and re-verification procedures are established in Volume 2, Part V. The untested materials protocol is established in Volume 2, Part VI. Conditional implementation checks are described in Volume 2, Part V, Section 5.4.

Section B - Submittal Requirements and Format

B.1 Submittal Deadline and Procedures

Proposals are due no later than **3 PM CT on Friday, September 11, 2026**. Proposals will be opened after the submittal deadline in accordance with applicable law. No award of contract will be made at proposal opening. Faxed or emailed proposals will not be accepted.

B.2 Number of Copies and Submittal Delivery

The submittal must include three (3) hard copies (one original and two copies), in a sealed envelope clearly marked on the outside with the Bidder's Name, "**CONFIDENTIAL: Proposal for MET Center PCB Remediation Services**," and the date of proposal submission.

Send submittals, or hand deliver to:

Land Clearance for Redevelopment Authority c/o St. Louis Economic Development Partnership 120 S. Central Ave., Suite 200, Clayton, Missouri 63105. Attn: Josh Ayers, Chief Financial Officer.

B.3 Required Submittal Content

To be considered for selection, each firm must submit the following information in keeping with the format described below, identifying each item by letter designation. Incomplete submittals or submittals that do not address the required items may be considered non-responsive.

(a) Letter of Introduction

Briefly describe the firm, including legal name and form of organization, office location(s), and the name, title, address, email, and telephone number of the designated contact person for this procurement. Provide a summary of the firm's understanding of the scope of services and the overall approach to performing the Work. This letter should indicate features, skills, and/or services that distinguish the firm for TSCA PCB cleanup work and should state why the firm believes it is the best qualified to perform the services described in this RFP. Describe the firm's management philosophy and style in providing services to public sector clients. Indicate whether any conflicts of interest exist or could arise due to working for the LCRA.

(b) Statement of Qualifications (Non-Promotional)

The Statement of Qualifications shall be factual and non-promotional and shall address the following:

1. Demonstrated TSCA PCB cleanup project experience within the past five (5) years (required). Identify representative contracts the firm is currently undertaking of a similar nature and has undertaken in the recent past and describe the type of services provided under each contract, including project size, duration, and regulatory framework. Provide a scope of services summary for at least one previous or existing TSCA PCB cleanup contract.
2. PCB waste management experience under 40 CFR §761 (required). Demonstrate the firm's experience with PCB waste classification (including the distinction between PCB Remediation Waste under §761.61 and PCB Bulk Product Waste under §761.62), waste routing and manifesting to TSCA-approved disposal facilities, temporary storage under §761.65(c), and equipment decontamination under §761.79.
3. Risk-based cleanup experience under 40 CFR §761.61(c) (preferred). If the firm has performed work under an EPA-approved risk-based cleanup plan, describe the project, the

applicable EPA Region, the verification framework used, and the outcome, including verification-driven turnover decisions and closeout reporting.

4. Experience with occupied-building PCB remediation (preferred). Describe projects where PCB remediation was conducted in or adjacent to occupied spaces, including the engineering and administrative controls implemented to protect building occupants from exposure to PCB-bearing dust and the access or scheduling constraints encountered.
5. Safety record, medical surveillance, and exposure monitoring programs. Discuss the firm's safety record, including its Experience Modification Rate (EMR) for the most recent three (3) years. Describe the firm's medical surveillance program for PCB-exposed workers and its approach to exposure monitoring, including personal air monitoring during intrusive work and biological monitoring where applicable. Describe how site safety and onsite risk management will be handled for this project.
6. IC/O&M implementation support experience (preferred). If the firm has supported institutional control (IC) and operations and maintenance (O&M) implementation on prior projects, describe that experience, including preparation of deed restriction or environmental covenant exhibits, managed-area documentation, as-built control mapping, and any post-remediation inspection or monitoring support provided to building owners or regulatory agencies.

(c) Personnel and Allocation of Resources

1. Provide the names, titles, experience, and qualifications of the following key personnel proposed for this project: Project Manager, Site Superintendent, Health and Safety Officer (or Industrial Hygiene Lead), and QA/QC Manager. Provide resumes for all proposed key personnel. Resumes shall identify relevant TSCA/PCB training and certifications, including 40-hour HAZWOPER training and current 8-hour refresher status, and any additional certifications relevant to PCB remediation (for example, competent person designations, lead/asbestos certifications where co-located hazards exist, and applicable state contractor licenses).
2. Provide the office location that would be servicing the LCRA and the staffing level at that office. Describe the firm's staffing plan for this project, including any proposed rotational schedule for primary field crews and the staffing assumptions used to develop the firm's pricing. If the Bidder elects to use the Owner's pricing-normalization planning assumption in Exhibit X-5 or Exhibit X-8, identify that assumption clearly. Actual scheduling remains Owner-directed and may differ from pricing assumptions.

(d) Technical Approach

The Technical Approach shall be a narrative document, not to exceed twenty (20) pages, that demonstrates the firm's understanding of the project requirements and its proposed approach to achieving the performance outcomes described in this RFP. The Technical Approach shall address the following:

1. Understanding of the Cleanup Plan's risk-based framework.

Describe the firm's understanding of the 40 CFR §761.61(c) risk-based cleanup approach as implemented through the Cleanup Plan, including the remedy selection logic (Categories A

through D), the Verification Unit (VU) framework, and the relationship between source control, verification, and zone turnover.

2. Approach to verification implementation, turnover sequencing, and documentation gates.

Describe the firm's approach to implementing the verification and turnover framework established in Volume 2 and the Cleanup Plan, including Verification Unit implementation and turnover sequencing, management of reporting limits for turnover decisions, exceedance response and re-verification, any conditional or trigger-based checks allowed by the Cleanup Plan, and assembly of Verification Unit turnover documentation packages. Identify proposed analytical methods, target reporting limits, and laboratory turnaround times for wipe, bulk, and indoor air analyses sufficient to support the Volume 2 verification requirements. The proposer's cost proposal shall include laboratory analytical allowances per Exhibit X-7.

3. Waste classification methodology.

Describe the firm's approach to field-level waste classification distinguishing PCB Remediation Waste (40 CFR §761.61) from PCB Bulk Product Waste (40 CFR §761.62), including application of the project's bulk product rule: if a manufactured PCB product remains adhered to a building substrate at the time of removal, the combined item may be managed as PCB Bulk Product Waste under §761.62; if the product is separated from the substrate prior to disposal, the remaining contaminated substrate is PCB Remediation Waste managed under §761.61. Describe the firm's approach to management of untested and newly encountered materials under the Cleanup Plan's default management framework. Identify proposed disposal facility assumptions for each waste stream identified in Exhibit X-6. For each proposed receiving facility, identify any known concentration limits, material-type restrictions, pre-approval requirements, or capacity constraints that could affect disposal routing or schedule for the waste streams anticipated under this project.

4. Occupied-building interface management.

The MET Center will remain an active workforce training, family services and administrative facility during portions of the Work. Describe the firm's approach to maintaining safe building operations and occupant protection during remediation, including: access control and work zone segregation in areas adjacent to occupied spaces; scheduling of high-disruption activities to minimize occupant exposure; containment integrity monitoring and pressure management relative to occupied areas; communication and notification protocols for building management and occupants; and compliance with Owner-directed access and sequencing constraints. The remediation contractor's responsibility is limited to managing its own Work and complying with Owner-directed constraints and does not include direction of other contractors' schedules or means and methods.

5. Approach to health and safety planning, exposure controls, cross-contamination prevention, and multi-hazard coordination.

Describe the firm's approach to preparing and implementing a site-specific Health and Safety Plan (HASP) with task-specific Job Safety Analyses (JSAs), including: engineering controls (negative-pressure containments, point-source capture, HEPA filtration); administrative controls (work-area access limitations, adjacent tenant notification, signage and barrier

plans); cross-contamination prevention (staged dirty and clean zones, tool assignment by zone, change-out procedures, daily supervisor walk-downs); personal protective equipment; exposure monitoring (personal air monitoring during intrusive work); and protection of occupied areas and new HVAC components from contamination during and after intrusive work. Where suspect or confirmed ACM or LBP are co-located with PCB-impacted materials, describe the firm's approach to NESHAP compliance and multi-hazard coordination planning, including how work controls, waste segregation, and worker protection will be managed when multiple regulated materials are encountered concurrently.

The Technical Approach shall identify how the Bidder will use the EWI Hazardous Building Materials Report dated November 2025 to define assumed ACM and LBP work areas, required certifications and licenses, regulatory notification responsibilities, and interfaces between PCB controls and asbestos or lead safe-work requirements.

Describe the firm's incident response procedures, including stop-work authority, corrective action protocols, and communication procedures with the Owner and Owner's Environmental Consultant when a safety event or work control failure occurs.

6. Proposed phasing and scheduling approach.

Provide a preliminary phasing and scheduling narrative consistent with Cleanup Plan Section 12. The narrative shall be organized using the phase structure defined in Exhibit X-8, which defines the following phases for cost and schedule alignment:

- Phase 1: Pre-Mobilization and Submittal Development
- Phase 2: Coatings/Paint Remediation (Source Removal/Treatment)
- Phase 3: Porous Concrete Work (Localized Removal/Treatment)
- Phase 4: HVAC and Dust Reservoir Controls (Cleaning/Protection/Integration)
- Phase 5: Verification Sampling and Data Evaluation (Turnover Support)
- Phase 6: Waste Management, Staging, and Decontamination (Handling)
- Phase 7: IC/O&M Interface Support (As-Built, Managed Areas, O&M Startup)
- Phase 8: Closeout, Completion Report, and Stewardship Record Package

For each phase, identify proposed mobilization blocks, the sequence of Verification Unit work, critical path items (including long-lead analytical turnaround, containment throughput, and verification sampling logistics), and anticipated duration. The narrative shall specifically identify how the Bidder has accounted for extensive Low Bay ceiling-related work, including PCB-impacted drywall ceiling areas and concrete above drywall ceiling areas, in its sequencing, overhead access planning, containment approach, crew loading, and anticipated duration assumptions.

The Bidder shall identify how it will coordinate access, phasing, utility interfaces, containment boundaries, and occupied-building protection with the Owner, EWI, KAI, MET Center operations, and any active renovation or HVAC contractor identified by the Owner if their work remains active during remediation. This coordination requirement does not

transfer the cleanup Contractor's TSCA compliance obligations, health and safety obligations, or means-and-methods responsibility to any other contractor.

7. Change management and EPA coordination.

Describe the firm's understanding of and approach to the Cleanup Plan's change management provisions, including: recognition and documentation of field conditions that trigger change management submittals (for example, discovery of new pathways, planned breach of a managed barrier, or conditions requiring deviation from approved work controls); preparation of field change notices; and coordination with the Owner and Owner's Environmental Consultant when a material change requires EPA coordination prior to implementation. Describe how the firm will support the Owner's obligation to provide monthly progress updates to EPA during active implementation phases.

8. Submittal, data management, and documentation workflow.

Describe the firm's proposed workflow for managing project submittals, field data, and documentation throughout the project, including: chain-of-custody procedures for all verification samples; daily field logs and photo documentation protocols; waste manifesting and tracking procedures; management of verification data packages from field collection through laboratory receipt and QA review; and assembly and transmittal of VU turnover documentation packages to the Owner's Environmental Consultant. Identify the firm's proposed document management system or approach and describe how records will be organized, transmitted, and archived to support the Completion Report, Stewardship Record, and long-term recordkeeping requirements.

(e) References

Provide at least three (3) references that may be contacted for verification of the firm's experience and qualifications. The list of references shall include a minimum of at least one public entity for which similar services have been performed and at least one project involving TSCA PCB cleanup work. Provide names, titles, telephone numbers, and email addresses of personnel who can be contacted with regard to the services provided.

(f) Litigation History

Provide specific information on the firm's performance history, in the last five (5) years, with respect to:

1. Termination for default on any contract.
2. Litigation by or against the firm, including any environmental enforcement actions, consent orders, or administrative proceedings related to TSCA, RCRA, CERCLA, OSHA, or state environmental regulatory programs.
3. Judgments entered for or against the firm.

(g) Bid Forms and Documents

All Bidders MUST complete the Bid Forms and Documents listed below and MAY NOT substitute them with other or similar forms.

Standard LCRA Forms (Attachment 5):

1. Appendix A - Bidder Information Sheet and Statement of Qualifications
2. Appendix B - Bid Proposal
3. Appendix C - Form of Bid Bond (five percent (5%) of the proposed Base Bid Total NTE amount)
4. Appendix D - Affidavit of Compliance with Section 292.675 R.S.Mo
5. Appendix E - Form of Contractor Affidavit
6. Appendix F - Federal Funding Requirements
7. Appendix G - Prevailing Wage Order
8. Appendix H - Site Visit Verification Form
9. Appendix I - Bid Submittal Checklist

Cost and Technical Pricing Forms (Exhibit X Series):

10. Exhibit X-1 - Pricing Instructions and Definitions. Exhibit X-1 provides definitions and pricing instructions applicable to Exhibits X-2 through X-9, including the compensation basis, treatment of burden/fringe, equipment-rate assumptions, mobilization-block assumptions, waste unit-price inclusions, contingency unit-price use, and documentation required to support payment.
11. Exhibit X-2 - Labor Rate Schedule. Enter proposed hourly rates for all listed labor categories (straight time, overtime, and holiday/premium) and include confirmation that burden/fringe is included.
12. Exhibit X-3 - Equipment Rate Schedule. List major equipment with unit rates and identify ownership basis (owned/rented/subcontract), standby rates, and minimum charges.
13. Exhibit X-4 - Materials and Consumables Schedule. Enter allowance amounts (NTE) for each defined material bucket. Billing shall be supported by receipts or invoices as indicated on the form.
14. Exhibit X-5 - Mobilization, Demobilization, and Per Diem. Enter unit rates for each listed item. If the Bidder uses the Owner's pricing-normalization planning assumption, proposers may assume rotational blocks of approximately 10 days on / 4 days off. Actual schedules are Owner-directed.
15. Exhibit X-6 - Waste Management and Disposal Unit Prices. Enter unit prices by waste stream (WS-1 through WS-8, shown below as presented in Exhibit X-6) and indicate which components are included in the unit price (packaging, profiling, transport, disposal fee, manifests/COD). Identify assumed disposal facilities.

Waste Stream ID	Waste Category	Container Type	Unit (ton/drum/box/each)
WS-1	PCB Remediation Waste	Roll-Off	ton
WS-2	PCB Remediation Waste	Drum	drum
WS-3	PCB Remediation Waste	Box	box
WS-4	PCB Bulk Product Waste (Eligible)	Roll-Off	ton
WS-5	PCB Bulk Product Waste (Eligible)	Box	box
WS-6	PCB Articles (Ballasts)	Each	each
WS-7	PCB Liquids / Decon Fluids (If Applicable)	Drum	drum
WS-8	Other (Specify)		

16. Exhibit X-7 - Verification Sampling and Laboratory Allowances. Enter unit rates for sampling event support and laboratory analytical allowances for wipe, bulk, and indoor air analyses. Include data validation and QA review allowances. Identify target reporting limits and standard turnaround time assumptions in the Notes column.
17. Exhibit X-8 - NTE Summary by Phase/Task. Enter NTE amounts by category (labor, equipment, materials/consumables, mobilization/per diem, and waste management handling) for each of the eight defined phases. Phase totals auto-calculate. Include the basis of each NTE (crew size, hours, mobilization blocks, key assumptions) in the designated column.
18. Exhibit X-9 - Unit Price Schedule (Contingency and Owner-Directed Allowances). Enter unit prices for the contingency and allowance items listed. These items are Owner-authorized and will not be exercised without prior written authorization from the Owner.

(h) DBE/MBE/WBE/Veteran Participation

Describe the firm's commitments to Disadvantaged Business Enterprise (DBE), Minority Business Enterprise (MBE), Women's Business Enterprise (WBE), and/or Veteran-owned business participation on this project, including:

1. Participation commitments and documented good-faith outreach efforts undertaken to identify and engage DBE/MBE/WBE/Veteran-owned firms for subcontracting opportunities on this project.
2. A subcontracting plan identifying the proposed subcontractors (if any), the scope of work to be performed by each, the percentage of the total contract value anticipated for each subcontractor, and the firm's approach to tracking and reporting participation throughout the project.

B.4 Proposal Evaluation

B.4.1 Responsiveness Determination (Pass/Fail)

Prior to scored evaluation, each proposal will be screened for responsiveness. A proposal must satisfy all of the following to be considered responsive:

1. All required forms are completed, signed where required, and submitted; all addenda are acknowledged; and Exhibits X-2 through X-9 are completed in accordance with the instructions in Exhibit X-1.
2. The proposal includes a written commitment to meet the Cleanup Plan acceptance criteria and verification framework as described in this RFP, with no alternate endpoints proposed unless through an EPA-approved change process.

3. The proposal contains no conditional exceptions that shift means-and-methods responsibility to the Owner beyond the performance-based framework described in this RFP.
4. Required insurance and licensing confirmations are provided.

A proposal that fails the responsiveness screen will not proceed to scored evaluation.

B.4.2 Scored Evaluation Criteria

Responsive proposals will be evaluated by a selection committee using a weighted scoring matrix. The evaluation criteria, point allocations, and scoring scale are as follows:

Scoring Scale (0 - 5 rating applied to each sub-criterion):

- 5 = Excellent, fully compliant, low risk, substantiated, directly addresses project gates.
- 4 = Very Good, compliant, minor gaps that are easily cured.
- 3 = Acceptable, compliant but moderate gaps or generic approach.
- 2 = Weak, material gaps or unclear commitments, elevated risk.
- 1 = Poor, largely nonresponsive, significant risk.
- 0 = Unacceptable, fails a mandatory element or conflicts with Cleanup Plan.

B.4.3 Evaluation Criteria and Point Allocation

Criterion 1: TSCA PCB Experience and Qualifications (20 points)

Evaluation will emphasize demonstrated TSCA PCB cleanup projects involving building-material PCBs under 40 CFR §761.60, §761.61, and §761.62; risk-based cleanup experience under §761.61(c) including verification-driven turnover and closeout reporting; qualifications and continuity of key personnel (Project Manager, Site Superintendent, QA/QC lead, and IH lead) including occupied-building or phased-turnover work experience; and IC/O&M implementation support experience including deed restriction or environmental covenant exhibits, managed-area documentation, and as-built control mapping.

Criterion 2: Technical Approach and Understanding of Cleanup Plan and Verification Logic (25 points)

Evaluation will focus on the bidder's demonstrated understanding of, and ability to implement, the verification and turnover requirements established in Volume 2 and the Cleanup Plan, including acceptance criteria and decision metric as defined therein, Verification Unit implementation and turnover sequencing, exceedance response and re-verification, turnover documentation package content and assembly, waste classification and routing logic consistent with the Cleanup Plan, and change management and EPA coordination triggers.

Criterion 3: Health and Safety and Exposure Control Program (15 points)

Evaluation will address: OSHA compliance and training plan including containment, HEPA, decontamination, and PCB work practices; demonstrated understanding and use of the EWI Hazardous Building Materials Report dated November 2025 for planning work in areas with suspect or confirmed ACM or LBP; NESHAP and multi-hazard coordination planning (ACM, LBP) as applicable; exposure control and cross-contamination prevention suitable for occupied-building interfaces and protection of HVAC components and building systems from

recontamination attributable to the Contractor's Work; and incident response, stop-work authority, and corrective action protocols.

Criterion 4: Project Management, Schedule, and Integration (15 points)

Evaluation will consider: work planning and phasing logic supporting Verification Unit turnover sequencing; work planning under Owner-directed access constraints, including HVAC dust-reservoir controls and protection of building systems from contamination or recontamination attributable to the Contractor's Work; submittal, data, and documentation workflow (chain of custody, field logs, photo logs, turnover packages); and staffing plan, supervision coverage, and subcontractor control.

Criterion 5: Cost Structure and Internal Consistency of T&M NTE Assumptions (20 points)

Cost will be evaluated in two parts: (a) evaluated total cost using Appendix K Owner-defined evaluation quantities and Owner-entered normalized pricing data drawn from proposer bid forms and rate schedules, 10 points, calculated; and (b) internal consistency and realism of unit rates, productivity assumptions, staffing levels, unit-price assumptions, and phase NTE allocations, 10 points, reviewer-scored. Exhibit X-1 is provided for definitions and instructions only and is not a proposer-completed pricing exhibit. Down-scoring will apply where pricing appears front-loaded, omits key cost elements or conflicts with the proposer's technical approach. The lowest-cost proposal will not necessarily receive the highest cost score.

Criterion 6: Clarity of Subcontracting Plan and Tracking Approach (5 points)

Evaluation will consider the clarity, completeness, and practical enforceability of the Bidder's subcontracting plan and tracking approach, including identification of proposed subcontractors, if any, assigned scopes of work, subcontractor control, documentation flow, and tracking/reporting procedures. DBE/MBE/WBE/Veteran participation commitments and related good-faith outreach efforts, if any, shall be documented in the proposal, but they are not separately scored as part of the point-based evaluation.

Total: 100 points

The LCRA reserves the right to reject any or all proposals, to waive informalities or irregularities in any proposal, and to negotiate with any firm. The LCRA is not obligated to accept the lowest-cost proposal. Award, if made, will be to the most responsive and responsible bidder based on the evaluation criteria described herein.

Section C - Inquiries

All inquiries concerning this RFP, the Project, the Cleanup Plan, or the Contract Documents should be directed via email simultaneously to the following contacts:

Owner:

Land Clearance for Redevelopment Authority

Attn: Josh Ayers, Chief Financial Officer

JAyers@stlpartnership.com

With a copy to Sarah Kroner, skroner@stlpartnership.com

Owner's Environmental Consultant:

Environmental Works, Inc.

Ed Creaden, Principal Scientist

ecreaden@environmentalworks.com

All questions must be submitted in writing by email to both contacts listed above. Oral questions may be asked at the mandatory pre-bid meeting; however, Bidders shall not rely on any oral answers to questions raised at the pre-bid meeting or at any other time. Bidders shall not rely on any interpretation or clarification of, or correction or change to, the Contract Documents, the Cleanup Plan, or any other RFP document unless it is in the form of a written Addendum issued by the LCRA.

Answers to the questions and any addenda to this RFP will be posted on the LCRA's website at <https://stlpartnership.com/rfp-rfqs/> and through the designated plan room. An email will be sent to all firms that participate in the mandatory pre-bid meeting indicating the link to the questions and answers and any addenda.

No Bidder or its agents shall contact EPA Region 7, MoDNR, St. Louis County, or any other regulatory agency regarding this RFP, the Cleanup Plan, or the project's regulatory status. All regulatory communications are exclusively the responsibility of the Owner and the Owner's Environmental Consultant. Unauthorized regulatory contact by a Bidder or its agents may result in disqualification.

Section D - RFP Schedule

The following timeline applies to the RFP; however, the LCRA may change the estimated dates and process as deemed necessary:

Activity	Date
RFP Issued & Advertised	Thursday, August 20, 2026
Mandatory Pre-Bid Meeting and Site Visit	2:30 PM CT on Wednesday, August 26, 2026
Deadline for Submission of Written Questions	1:00 PM CT on Friday, August 28, 2026
Anticipated Answers Returned to Bidders	Wednesday, September 2, 2026
Proposal Due Date	3:00 PM CT on Friday, September 11, 2026

Execution of a contract and issuance of a Notice to Proceed are anticipated as soon as administratively possible following the Proposal Due Date. Questions must be submitted by email to the attention of the contacts listed under Section C.

Project Schedule

Bidders shall submit a proposed project schedule in accordance with Appendix B, Section F, identifying anticipated durations and sequencing for each Exhibit X-8 phase, mobilization blocks, critical-path activities, and proposed substantial and final completion dates. The schedule should reflect the Bidder's proposed staffing, sequencing, and other implementation assumptions and identify any assumptions requiring Owner coordination. The final baseline schedule and contractual milestone dates will be established following award.

Please note that the Notice to Proceed date is contingent upon execution of the Contract. The Owner reserves the right to amend or modify milestone dates at its sole discretion in accordance with applicable law.

The phase designations correspond to the phases defined in Exhibit X-8. Bidders shall use these phase designations in both their Technical Approach narrative (Section B, Item (d)(6)) and their cost proposal (Exhibit X-8).

Section E - Examination of Specifications and Work Site

E.1 Mandatory Pre-Bid Meeting and Site Visit

There will be one (1) mandatory pre-bid meeting and site visit; attendance at the pre-bid meeting is mandatory. The mandatory pre-bid meeting and site visit shall be on **Wednesday, August 26, 2026, at 2:30 PM CT**. The pre-bid meeting will be held at the Project site at 6347 Plymouth Avenue, Wellston, MO 63133.

The pre-bid meeting will include a brief presentation summarizing the Cleanup Plan's risk-based framework, the Verification Unit structure, the HVAC dust-reservoir control requirements and protection requirements, the waste classification and routing framework, and the project's phasing approach. Bidders will have the opportunity to observe site conditions, including representative work areas in the office tower and warehouse complex. Access to the North Tower will not be provided; the North Tower is a permanently closed managed area and is addressed in the Cleanup Plan Section 10 and in Section A.6.5 of this RFP.

All Bidders attending the mandatory pre-bid meeting and site visit shall execute the Site Visit Verification Form (Appendix H) and submit it with their proposal.

E.2 Addenda

The Owner reserves the right to issue Addenda from time to time prior to the date of proposal opening. Failure to acknowledge the Addenda, and include such acknowledgement with the Bid Proposal, may result in the rejection of the Bid Proposal.

E.3 Bidder's Obligation to Examine

The Bidder is expected to examine carefully the Project site, this RFP, the Cleanup Plan (Volume 3, Exhibit A), and all other Contract Documents, before submitting a proposal. The submission of a proposal shall be considered evidence that the Bidder has made such examination and is satisfied as to the conditions to be encountered in performing the Work and as to the requirements of the Contract Documents. Failure of a Bidder to be acquainted with the amount and nature of work required to complete any applicable portion of the Work, in conformity with all requirements of the Contract Documents, will not be considered as a basis for additional compensation.

The Bidder's examination obligation extends to, but is not limited to:

1. The location, condition, layout, and nature of the site and surrounding areas, including occupied-building conditions and access constraints
2. Generally prevailing climatic conditions
3. Anticipated labor supply and costs, including specialized TSCA/PCB remediation labor
4. Availability and cost of materials, tools, and equipment
5. The regulatory framework governing the Work, including 40 CFR Part 761, OSHA, NESHAP, RCRA, and applicable Missouri and St. Louis County requirements
6. The EPA-approved Cleanup Plan including any EPA approval conditions.

7. The EWI Hazardous Building Materials Report dated November 2025, including reported suspect and confirmed ACM and LBP locations and the associated work-planning implications for co-located regulated materials.

E.4 Prevailing Wage and Davis-Bacon Requirements

The Contractor and all subcontractors shall comply with applicable Davis-Bacon Act requirements and the Missouri Prevailing Wage Law. The applicable Davis-Bacon wage determination is attached in Appendix F-1. The Missouri Annual Wage Order for St. Louis County is attached in Appendix G-1. Where both requirements apply to a worker classification, the Contractor shall pay not less than the higher applicable wage rate. The Contractor shall confirm that the wage determinations remain current as required by applicable law and shall post all required wage-rate notices at the Project site.

E.5 St. Louis County Requirements

The requirements of St. Louis County Charter Section 12.020 and St. Louis County Revised Ordinances Section 107.130(7) apply to this solicitation to the extent not prohibited by federal or State funding conditions. Each proposer shall submit, with its proposal, a notarized Affidavit of Compliance (Appendix E) certifying compliance with Charter Section 12.020 and Section 107.130(7). For Section 107.130(7), the proposer shall also attach a copy of its drug-testing policy.

E.6 State Sales Tax Exemption

The Owner is a governmental entity exempt from Missouri sales tax and will provide tax-exemption documentation as applicable. Bidders shall prepare proposals in accordance with the terms of the Owner's tax-exempt certificate and applicable Missouri law. Contractor and subcontractor use of the exemption shall be governed by the Contract Documents and the procedures provided by the Owner.

Section F - Bid Bond and Performance and Payment Bond

Each proposal must include a Bid Bond, Certified Check, Cashier's Check, or an Irrevocable Letter of Credit drawn on a solvent bank, payable to the LCRA, in an amount not less than five percent (5%) of the proposed Base Bid Total NTE amount (Exhibit X-8, Base Bid Total NTE). Cashier's checks and Bid Bonds shall be returned to all unsuccessful Bidders in accordance with this RFP.

As a condition to awarding the contract, the successful Bidder must be able to furnish a Performance and Payment Bond, Irrevocable Letter of Credit, or Certified or Cashier's Check drawn on a solvent bank made jointly payable to the LCRA in an amount equal to one hundred percent (100%) of the Contract price. All bonds must be issued by a surety authorized to do business in the State of Missouri and with a minimum rating of "A-" by A.M. Best. The costs for all performance and payment bonds shall be included in the Bid Proposal.

The Performance Bond shall remain in effect for the duration of the Contract, including any period required for completion of the Completion Report and Stewardship Record Package (Phase 8 per Exhibit X-8) and any warranty or correction period established in the Contract Documents.

Section G - Award of Contract

G.1 Best-Value Selection

Award of a contract, if made, will be to the most responsive and responsible Bidder determined through the best-value evaluation process described in Section B.4 of this RFP. The award will be based on the total scored evaluation across all six criteria, totaling 100 points:

- TSCA PCB Experience and Qualifications
- Technical Approach and Understanding
- Health and Safety and Exposure Control Program
- Project Management, Schedule, and Integration
- Cost Structure and Internal Consistency
- Clarity of Subcontracting Plan and Tracking Approach.

The LCRA is not obligated to award the contract to the lowest-cost proposer.

In no case will an award be made until all necessary investigations are made as to the responsibility of the Bidder to whom it is proposed to award the Contract. The successful Bidder will be notified that its proposal has been accepted and that it will be awarded the Contract.

G.2 LCRA Reserved Rights

The LCRA reserves the right to:

1. Reject any and all proposals for any and all items covered in this RFP
2. Waive informalities or defects in proposals
3. Reject the proposal of a Bidder who, in the LCRA's opinion, is not qualified to perform the Contract
4. Conduct interviews with shortlisted Bidders, if the LCRA determines that interviews would assist in differentiating among competitive proposals
5. Negotiate with any Bidder regarding the scope, schedule, or cost elements of the proposal prior to award
6. Accept any proposal that it deems to be in the best interest of the LCRA.

G.3 Post-Award Regulatory Obligations

Upon award and prior to Notice to Proceed, the successful Bidder and the Owner shall co-execute the certification required by 40 CFR §761.61(a)(3)(i)(E), confirming that sampling and analytical procedures are on file and available for inspection. This certification is a condition precedent to the commencement of intrusive field work under the Cleanup Plan.

Section H - Execution of the Contract

H.1 Execution Deadline

Within ten (10) business days after written notice of award, the successful Bidder shall execute the Contract and deliver all required post-award submittals listed in Section H.2. The Owner may extend this deadline in writing.

H.2 Required Post-Award Submittals

The successful Bidder shall provide, at a minimum, the following as conditions precedent to Contract execution and issuance of Notice to Proceed:

1. Executed Agreement
Executed copies of the Agreement in the form included in Part II, together with any required attachments and exhibits.
2. Bonds and Security
Performance and Payment Bond (or other security if permitted by the Contract Documents), in the amounts and form required by Section F and the Contract Documents.
3. Insurance
Certificates of Insurance and endorsements demonstrating compliance with the insurance requirements summarized in Section L and specified in Part III, Exhibit A. Certificates shall name the additional insureds identified in Section L and shall not contain exclusions inconsistent with the required coverages.
4. Required Affidavits and Forms
Any post-award affidavits or certifications required by the Contract Documents that are not already provided with the proposal.

H.3 Failure to Execute

If the successful Bidder fails to execute the Contract and deliver required post-award submittals within the time required, the Owner may, in its sole discretion, determine that the Bidder is non-responsive for award purposes, withdraw the award, and proceed to award to another Bidder or re-solicit, without liability to the Owner.

H.4 Compliance With Applicable Laws

The successful Bidder shall comply with all applicable federal, state, and local laws, ordinances, and regulations governing performance of the Work, including without limitation TSCA 40 CFR Part 761, OSHA requirements, NESHAP requirements where applicable, and applicable Missouri and St. Louis County requirements, consistent with the performance-based framework of this RFP and the Contract Documents.

H.5 Site Familiarity and Conditions

By executing the Contract, the Contractor represents that it has examined the Project site and Contract Documents as required by Section E and has satisfied itself as to the general conditions to be encountered in performing the Work. The Contractor further represents that it has included in its proposal all costs and requirements necessary to complete the Work in accordance with the Contract Documents.

Section I - Commencement Date

I.1 Notice to Proceed

The Work shall commence upon issuance of a written Notice to Proceed (NTP) by the Owner.

I.2 Conditions Precedent to NTP

The Owner will not issue the NTP until the Contract has been executed and the successful Bidder has provided all post-award submittals required by Section H, and any other conditions precedent identified in the Contract Documents have been satisfied.

Section J - Scope of Work Summary

J.1 General

The Contractor shall furnish all labor, supervision, equipment, materials, tools, incidentals, administration, financing, insurance, and services necessary to perform and complete the Work in strict accordance with the Contract Documents.

J.2 Governing Contract Documents

The Work shall be performed in accordance with the Contract Documents, including Volume 2 (Technical Scope and Compliance Requirements) and the governing technical document incorporated by reference in Volume 3, Exhibit A (EPA-approved 40 CFR §761.61(c) Cleanup Plan and EPA approval conditions). The Contractor shall implement, and shall not modify, the approved performance endpoints, verification framework, and waste management requirements established in the governing technical document.

J.3 Performance-Based Framework and Means and Methods

This procurement is performance-based. The Contractor is responsible for selecting and implementing compliant means and methods to achieve the performance outcomes and documentation deliverables required by the Contract Documents. The Owner does not prescribe detailed means and methods. The Contractor's means and methods must remain TSCA-compliant, OSHA-compliant, and consistent with all other applicable requirements and the Contract Documents.

J.4 Technical Scope Reference

A summary of the Project background and the performance-based scope categories is provided in Attachment 3, Section A. Detailed technical requirements, performance endpoints, verification requirements, documentation packages, and waste management requirements are provided in Volume 2.

J.5 Site Operations During the Work

Portions of the Project site will remain an active workforce training and administrative facility during portions of the Work. The Contractor shall conduct its Work in a manner that maintains safe operations, controlled access, and occupant protection consistent with the Contract Documents and Owner-directed access constraints.

J.6 Scope Boundary

The Contractor's obligations are limited to the Work under this Contract as defined by the Contract Documents. The Contractor is not responsible for the means and methods, schedules, or performance of other contractors.

Section K - Goals for MBE/WBE/DBE Participation

K.1 Policy

The Owner encourages participation by Disadvantaged Business Enterprise (DBE), Minority Business Enterprise (MBE), Women's Business Enterprise (WBE), and veteran-owned firms, consistent with applicable Owner policies and any applicable funding requirements.

K.2 Good-Faith Efforts and Documentation

Each Bidder shall document good-faith efforts and proposed participation commitments in its proposal in accordance with Section B.3(h) and the required bid forms. If awarded, the Contractor shall track and report participation consistent with the Contract Documents.

Section L - Insurance Requirements Summary

L.1 General

The Contractor shall procure and maintain insurance coverages required by the Contract Documents. The categories summarized below are for convenience only. The full insurance requirements, including limits, endorsements, notice provisions, and additional insured requirements, are provided in Part III, Exhibit A. No bidder may infer specific insurance limits from this summary alone. As part of its proposal, each bidder shall submit evidence of the insurance coverage required by Part III, Exhibit A and, if awarded the contract, shall at all times during the term of the contract maintain such insurance. Evidence of insurance coverage may include current coverage or a broker/carrier letter confirming the ability to obtain the required project-specific coverage if awarded.

L.2 Required Coverages

The Contractor shall, at a minimum, carry the following coverage types. Specific limits, endorsements, and bid-time evidence requirements are stated in Part III, Exhibit A.

1. Workers' Compensation and Employer's Liability
2. Commercial General Liability
3. Business Automobile Liability
4. Umbrella and/or Excess Liability
5. Property Insurance (as required by the Contract Documents)
6. Contractor's Pollution Liability (CPL), including coverage applicable to PCB-related remediation work or for transportation and/or disposal of contaminated material under TSCA as required by the Contract Documents.

L.3 Additional Insureds

The Contractor shall name the following as additional insureds on the policies where required by Part III, Exhibit A: the Land Clearance for Redevelopment Authority for the County of St. Louis (LCRA), St. Louis County, and the St. Louis Economic Development Partnership. If a Construction Manager is identified for the contract, the Construction Manager shall also be named as an additional insured where required by the Contract Documents.

L.4 Proof of Insurance

Bid-time and pre-award proof-of-insurance requirements shall be governed by the final Part III, Exhibit A.

Section M - Conflicting Terms

M.1 Order of Precedence

In the event of a direct conflict among Contract Documents, the following order of precedence shall apply, unless a document expressly states a different order for a specific subject:

1. Written contract amendments, change orders, and other post-award modifications executed by the Owner and Contractor
2. Written addenda issued by the Owner before award
3. Executed Agreement
4. Supplementary Conditions and Conditions of the Contract
5. EPA-approved 40 CFR 761.61(c) Cleanup Plan, EPA approval letter, and EPA approval conditions
6. Volume 2, Technical Scope and Compliance Requirements
7. Volume 1, RFP, Instructions to Bidders, bid forms, and procurement documents
8. Remaining reference documents and exhibits.
9. Notwithstanding the order above, the EPA-approved Cleanup Plan, EPA approval letter, and EPA approval conditions control the technical PCB cleanup requirements, acceptance criteria, verification framework, waste-management requirements, institutional-control support requirements, and EPA coordination requirements for the Work. No amendment, addendum, or contract provision shall be interpreted to authorize work inconsistent with the EPA-approved Cleanup Plan or EPA approval conditions unless the Owner has obtained the required regulatory concurrence or approval.

M.2 Interpretation

Where two requirements are not in direct conflict but differ in stringency, the more stringent requirement shall govern. The Contractor shall promptly notify the Owner in writing of any apparent conflict, ambiguity, or discrepancy and shall not proceed with affected Work until the Owner provides written direction.

General Terms

1. **Owner's Right to Request Additional Information**
The Owner may request additional information from any Bidder for the purpose of evaluating proposals, clarifying proposal content, or confirming responsibility.
2. **Owner's Rights; No Obligation to Award**
The Owner reserves the rights described in Section G.2. The Owner may reject any or all proposals, waive informalities, cancel this solicitation, or re-issue the solicitation, as permitted by applicable law.
3. **Public Records**
Proposals and related materials submitted in response to this RFP will be subject to public disclosure in accordance with applicable law. Bidders shall clearly identify any information they contend is exempt from disclosure. The Owner makes no representation that such information will be withheld if disclosure is required by law.

4. No Reimbursement of Proposal Costs

All costs associated with preparation and submission of a proposal are the sole responsibility of the Bidder. The Owner will not reimburse any Bidder for proposal preparation, site visits, interviews, or related costs.

5. Reliance on Written Contract Documents

Bidders shall rely only on the Contract Documents and written addenda issued by the Owner. No statement, explanation, or interpretation made by any person is binding unless incorporated into a written addendum or contract amendment executed by the Owner.

6. Modifications

No modification to the Contract Documents is effective unless issued as a written addendum prior to award or executed as a written contract amendment after award.

ATTACHMENT 4 – TECHNICAL SPECIFICATIONS REFERENCE

Standards and Proposed Equals

The articles, devices, materials, equipment, and other items named in the Contract Documents to denote kind and quality shall be known as standards and all proposals shall be based upon those standards. If the Bidder proposes to use articles, devices, materials, equipment, or other items other than those standards named, the Bidder shall submit information regarding the proposed equal to the Owner and the Owner's Environmental Consultant. The information shall include the name and a complete description of the proposed equal, including performance and test data and other information necessary for a complete evaluation, and a statement setting forth any changes that the proposed equal will require in the Work. The decision to approve or disapprove a proposed equal shall be solely within the discretion of the Owner and shall be final when made. The Owner shall have the discretion to reject a proposed equal for any reason, including the fact that the Bidder failed to provide sufficient information to enable complete evaluation.

Technical Scope Reference

The technical scope of the remediation services is provided in Volume 2 (Technical Scope and Compliance Requirements) of this RFP. The governing technical document for all remediation work is the EPA-approved 40 CFR §761.61(c) Risk-Based Cleanup and Disposal Application (Cleanup Plan), which is incorporated by reference as Volume 3, Exhibit A. Enforceable performance endpoints, verification requirements, waste management requirements, and documentation deliverables are established in Volume 2, Parts IV through VIII.

Remediation Scope Boundary

This procurement covers PCB remediation services performed under the Cleanup Plan. Renovation work performed under the separate PCB Protocol is not within the scope of this procurement. The Contractor shall not rely on, reference, or request the PCB Protocol. PCB wastes generated under this Contract may include PCB remediation waste, PCB bulk product waste, PCB articles, and PCB liquids, as determined under the Cleanup Plan and 40 CFR Part 761.

Documentation for Closeout

The Contractor shall ensure that all remediation activities, engineered controls, verification data, waste documentation, and as-built records are documented in sufficient detail in the Completion Report.

Long-Term Stewardship

The Stewardship Record, IC instruments, and long-term O&M programs will be administered by the Owner or under separate contract. The Contractor's documentation obligations are performance deliverables under this Contract and are specified in the Volume 2 scope categories and the Exhibit X-8 phase structure.

ATTACHMENT 5 – REQUIRED BID FORMS

The following documents marked with an asterisk (*) MUST BE COMPLETED and submitted with the Bid Proposal. Incomplete submissions may be deemed non-responsive.

1. Appendix A – Bidder Information Sheet and Statement of Qualifications *
2. Appendix B – Bid Proposal (T&M NTE Format) *
3. Appendix C – Form of Bid Bond *
4. Appendix D – Affidavit of Compliance with Section 292.675 R.S.Mo. *
5. Appendix E – Form of Contractor Affidavit *
6. Appendix F – Federal Funding Requirements
7. Appendix G – Prevailing Wage Order
8. Appendix H – Site Visit Verification Form *
9. Appendix I – Bid Submittal Checklist *
10. Appendix J – Owner Internal Bid Evaluation Summary (not a bidder submittal)

Exhibit X – Cost and Technical Pricing Forms

Exhibit X-1 – Pricing Instructions and Definitions

Exhibit X-2 – Labor Rate Schedule

Exhibit X-3 – Equipment Rate Schedule

Exhibit X-4 – Materials and Consumables Schedule

Exhibit X-5 – Mobilization, Demobilization, and Per Diem

Exhibit X-6 – Waste Management and Disposal Unit Prices

Exhibit X-7 – Verification Sampling and Laboratory Allowances

Exhibit X-8 – NTE Summary by Phase/Task

Exhibit X-9 – Contingency / Owner-Directed Unit Price Schedule

APPENDIX A**Bidder Information Sheet and Statement of Qualifications**

NOTICE: THIS FORM MUST BE FULLY COMPLETED AND SUBMITTED WITH THE BID PROPOSAL. Where necessary, provide attachments for additional information.

PART 1: COMPANY INFORMATION

1.01 Company Name: _____

☐ Corporation ☐ Partnership ☐ Joint Venture ☐ Individual / Sole Proprietor ☐ LLC

1.02 Number of years in business: _____

If not under present firm name, list previous firm names and types of organization: _____

1.03 Contracts on hand (complete the following schedule):

Project and Address	Owner	Owner's Rep	Contract Amount	% Complete

1.04 General description of work performed on the above contracts: _____

1.05 Representative projects completed in the last five (5) years of a type similar to that now being bid:

Project and Address	Owner	Owner's Rep	Contract Amount	Regulatory Framework

1.06 Percent of work done by own staff: _____% Number of permanent employees: _____

Geographical limits of operation: _____

1.07 There has been no default in any contract, completed or uncompleted, except as noted below:

A. Number of contracts on which default was made: _____

B. Description of defaulted contracts and reasons: _____

1.08 Within the last three (3) years, has any officer or partner of your organization been an officer or partner of another organization when it failed to complete a contract?

☐ NO ☐ YES (If Yes, attach a separate sheet giving details.)

1.09 Is fifty percent (50%) or more of your company owned by a minority? ☐ Yes ☐ No

Is fifty percent or more of your company owned by a woman? ☐ Yes ☐ No

Is your company a veteran-owned business? ☐ Yes ☐ No

1.10 Have any administrative or legal proceedings been started against you alleging violation of any wage and hour regulation or laws? ☐ Yes ☐ No (If Yes, give details.)

1.11 List banking references: _____

1.12 Do you have a current confidential financial statement on file with the LCRA?

☐ Yes

☐ No – I desire to file such statement with this bid, sealed in a separate envelope.

☐ No – Upon request I will, within three (3) days, file a detailed confidential financial statement.

PART 2: TSCA PCB QUALIFICATIONS ADDENDUM

2.01 Number of 40 CFR Part 761 PCB cleanup projects completed in the last 5 years: _____

2.02 Number of risk-based cleanups under 40 CFR §761.61(c) completed: _____

2.03 Experience with EPA Region 7 TSCA coordination? ☐ Yes ☐ No

If Yes, identify the project(s) and EPA contact(s): _____

2.04 Does your firm maintain a medical surveillance program for PCB-exposed workers?

☐ Yes ☐ No

If Yes, briefly describe the program (attach additional sheets if necessary): _____

2.05 Does your firm maintain a biological monitoring program for PCB-exposed workers?

☐ Yes ☐ No

2.06 Experience Modification Rate (EMR) for the most recent three (3) years:

Year 1: _____ Year 2: _____ Year 3: _____

2.07 Has your firm received any TSCA, RCRA, CERCLA, OSHA, or state environmental enforcement actions, consent orders, or administrative proceedings in the last five (5) years?

☐ Yes ☐ No

If Yes, describe each action (attach additional sheets if necessary): _____

APPENDIX B**BID PROPOSAL (TIME-AND-MATERIALS, NOT-TO-EXCEED FORMAT)**

The undersigned, having been duly authorized to execute this Bid Proposal, hereby proposes to furnish all labor, supervision, equipment, materials, tools, incidentals, administration, and services necessary to perform and complete the PCB Remediation Work at the MET Center in strict accordance with the Contract Documents, including Volumes 1, 2, and 3 of the Request for Proposals and all Exhibits, Addenda, and Attachments thereto.

The undersigned is:

() a Corporation organized and existing under the laws of the State of _____

() a partnership or joint venture consisting of _____

() an individual, trading as _____

A. Bid Proposal Submission

The Bidder shall complete and execute this Bid Proposal and enclose it in a sealed envelope clearly marked with the Bidder's Name, "**CONFIDENTIAL: Proposal for MET Center PCB Remediation Services**," and the date of proposal submission. The Bidder must submit its sealed Bid Proposal to the Owner in accordance with the instructions set forth in the Request for Proposals and Instructions to Bidders.

B. Bidder Registration and Licensing

All Bidders must be properly registered with and possess valid contractor or trade licenses from all applicable regulatory agencies required to perform the Work at the time of submission of this Bid Proposal.

C. Subcontractors

The Bidder hereby certifies that the following subcontractors will be used in the performance of the Work and that such subcontractors have agreed to perform the relevant portion of the Work, subject to the LCRA's approval.

NOTE: Failure to list subcontractors or the listing of more than one subcontractor for any category without designating the portion of work to be performed by each may result in rejection of the Bid Proposal. If the Bidder intends to perform any designated subcontract work with its own employees, the Bidder shall indicate this in the space below.

Name and Address of Subcontractor**Work to Be Performed**

Name: _____

Address: _____

Name: _____

Address: _____

Name: _____

Name and Address of Subcontractor**Work to Be Performed**

Address: _____

*(Attach additional sheets if necessary)***D. Submittal Requirements and Format**

The Bidder shall provide all submittal information detailed in the RFP at Attachment 3, Section B, titled "Submittal Requirements and Format," which shall include: (a) Letter of Introduction; (b) Statement of Qualifications; (c) Personnel and Allocation of Resources; (d) Technical Approach, Health and Safety, and Phasing Narrative; (e) References; (f) Litigation History; (g) Bid Forms and Documents; and (h) Subcontracting Plan and DBE/MBE/WBE/Veteran Participation.

E. Pricing Structure

1. The undersigned, as Bidder, declares:
 - o That this Bid Proposal is made without collusion with any other person, firm, or corporation.
 - o That the Bidder has carefully examined the Contract Documents, including the Request for Proposals and Instructions to Bidders, all Addenda, Volumes 1 through 3, and the EPA-Approved 40 CFR §761.61(c) Cleanup Plan (Volume 3, Exhibit A).
 - o That the Bidder has carefully examined the location, condition, and character of the existing building materials and site conditions, including attendance at the mandatory pre-bid meeting and site visit.
 - o That the Bidder agrees to provide all necessary labor, supervision, equipment, materials, tools, containments, and other means necessary to perform and complete the Work in the manner prescribed in the Contract Documents.
 - o That this Bid Proposal is submitted inclusive of all costs of insurance, required bonds, mobilization, and demobilization.
2. In submitting this Bid Proposal, the Bidder agrees:
 - o That the Owner has the right to reject this Bid Proposal in accordance with the Request for Proposals and Instructions to Bidders.
 - o To hold the rates, unit prices, and NTE amounts set forth in this Bid Proposal and in Exhibits X-2 through X-9 open for a period of sixty (60) calendar days from the date of the proposal opening, unless this time period is extended by mutual agreement.
 - o To accomplish the Work at the proposed rates, unit prices, and NTE amounts in accordance with the Contract Documents.
3. Base Bid Total NTE Amount: The Base Bid Total NTE Amount is the sum of all phase NTE amounts entered on Exhibit X-8 (NTE Summary by Phase/Task). In case of a discrepancy between the amount shown in words and the amount shown in figures, the amount shown in words shall govern. In case of a discrepancy between values on Exhibit X-8 and this summary, the values on Exhibit X-8 shall govern.

BASE BID TOTAL NTE AMOUNT:

 (In Words)\$

 (In Figures)

4. Unit Price Schedule: The Bidder shall complete Exhibit X-9 (Unit Price Schedule) for the contingency and Owner-directed items identified therein. Unit prices are not included in the Base Bid Total NTE Amount. Unit-priced work will be authorized individually by the Owner and billed at the proposed unit prices without markup. No item reasonably inferable as required to execute the baseline Work may be billed under X-9.
5. Compensation Basis: Compensation under this Contract shall be on a time-and-materials basis with a not-to-exceed (NTE) limit for each phase defined in Exhibit X-8. The Contractor shall not exceed any phase NTE amount without prior written authorization from the Owner. The total of all phase NTE amounts constitutes the Base Bid Total NTE Amount. Billing shall be supported by daily time sheets, equipment logs, material receipts, and waste manifests as applicable.

F. Proposed Schedule

The Bidder shall attach a proposed schedule identifying anticipated durations for each Exhibit X-8 phase, anticipated mobilization blocks, critical path activities, verification sampling and laboratory turnaround assumptions, waste shipment and disposal-documentation timing, and proposed substantial completion and final completion dates. The proposed schedule shall be consistent with the issued RFP schedule and shall identify assumptions requiring Owner coordination.

G. Bid Bond

The Bidder shall attach to this Bid Proposal a certified cashier's check or Bid Bond having a value of five percent (5%) of the Base Bid Total NTE Amount. Cashier's checks and Bid Bonds shall be returned to all unsuccessful Bidders in accordance with the Request for Proposals and Instructions to Bidders.

H. Addenda Acknowledgment

The Bidder acknowledges receipt of the following Addenda to the Contract Documents:

Addendum Number	Date Received

I. Certifications

By signing this Bid Proposal, the Bidder certifies that:

1. The Bid Proposal is made without collusion with any other person, firm, or corporation.
2. The Bidder has not offered, given, or agreed to give any gratuity, gift, commission, or thing of value to any Owner representative, public official, or person involved in this procurement for the purpose of influencing award.
3. The Bidder will not discriminate on the basis of race, color, religion, creed, sex, sexual orientation, gender identity, age, ancestry, national origin, disability, or veteran status in connection with this Contract.
4. The Bidder will comply with applicable federal, state, and local laws and regulations, including 40 CFR Part 761 as applicable to the Work.
5. The Bidder has disclosed any actual or potential conflict of interest known to the Bidder.

J. Execution

Firm Name: _____

Authorized Signature: _____

Printed Name and Title: _____

Date: _____

Address: _____

Telephone: _____ Email: _____

State of Incorporation (if applicable): _____

Federal Employer Identification Number: _____

APPENDIX C

FORM OF BID BOND

KNOW ALL PERSONS BY THESE PRESENTS:

That we, _____ (hereinafter called the "Principal"), as Principal, and _____ (hereinafter called the "Surety"), as Surety, are held and firmly bound unto the Land Clearance for Redevelopment Authority for the County of St. Louis (hereinafter called the "Owner"), in the penal sum of five percent (5%) of the Base Bid Total NTE Amount submitted by the Principal for the PCB Remediation of the MET Center, for the payment of which sum the Principal and Surety bind themselves, their heirs, executors, administrators, successors, and assigns, jointly and severally.

WHEREAS, the Principal has submitted a Bid Proposal to the Owner for the PCB Remediation of the MET Center, 6347 Plymouth Avenue, Wellston, Missouri 63133, dated _____, 2026, in accordance with the Request for Proposals and Contract Documents.

NOW, THEREFORE, the condition of this obligation is such that if the Principal:

1. Shall not withdraw the Bid Proposal within the period specified therein after the opening of Bid Proposals, or if no period is specified, within sixty (60) calendar days after the opening of Bid Proposals; and
2. Shall, within ten (10) calendar days after the prescribed forms are presented to the Principal for signature, execute a formal contract in accordance with the Bid Proposal as accepted, and furnish a Performance Bond and a Payment Bond, each in the amount of one hundred percent (100%) of the contract price, with surety or sureties satisfactory to the Owner;

Then this obligation shall be void. Otherwise, the obligation shall remain in full force and effect, and the Surety shall pay to the Owner the difference, not to exceed the penal sum hereof, between the amount of the Bid Proposal and the amount for which the Owner may in good faith contract with another party to perform the Work covered by the Bid Proposal.

The Surety, for value received, hereby agrees that the obligation of the Surety and its bond shall not be impaired or affected by any extension of the time within which the Owner may accept the Bid Proposal, and the Surety waives notice of any such extension.

IN WITNESS WHEREOF, the Principal and the Surety have executed this instrument under their separate seals this _____ day of _____, 2026, and each person signing this bond certifies that the person is authorized to execute this bond on behalf of the entity for which the person acts.

PRINCIPAL:

Name: _____

By: _____

Title: _____

(Seal)

SURETY:

Name: _____

By: _____

Title: _____

(Seal)

Name and Address of Surety's Resident Agent in Missouri:

Surety's A.M. Best Rating: _____

Power of Attorney Number: _____

(Attach Power of Attorney and certificate of authority of the agent executing the bond.)

APPENDIX D**AFFIDAVIT OF COMPLIANCE WITH SECTION 292.675 R.S.Mo.**

STATE OF _____

COUNTY OF _____

Before me, the undersigned notary public, personally appeared _____
(Name), who, being duly sworn, deposes and states:

1. That affiant is the _____ (Title) of _____
(Company Name), the Bidder that has submitted the attached Bid Proposal for the PCB Remediation of the MET Center, 6347 Plymouth Avenue, Wellston, MO 63133.
2. That affiant has personal knowledge of the facts stated herein.
3. That the Bidder and all subcontractors employed on this Project will comply with the requirements of Section 292.675 R.S.Mo., which requires that all on-site workers employed on public works projects by the contractor or subcontractor shall have successfully completed a ten-hour course in construction safety and health approved by the Occupational Safety and Health Administration (OSHA) or a similar program approved by the Missouri Department of Labor and Industrial Relations. This requirement applies to all on-site employees, including those performing PCB remediation, waste handling, decontamination, HVAC cleaning, and verification sampling activities.
4. That the Bidder and all subcontractors will provide documentation of the required training for each on-site employee to the Owner or the Owner's Environmental Consultant prior to that employee performing any on-site work.
5. That no employee will perform on-site work on this Project who has not completed the training required by Section 292.675 R.S.Mo. within sixty (60) days of the employee's first day on the Project.
6. That the Bidder understands and acknowledges that a penalty of Two Thousand Five Hundred Dollars (\$2,500.00) per untrained employee will be assessed for each violation of Section 292.675 R.S.Mo., and that such penalty may be withheld from progress payments to the Contractor.

Affiant further states that affiant has read the foregoing Affidavit and that the facts stated herein are true.

Signature of Affiant: _____

Printed Name: _____

Title: _____

Sworn and subscribed to before me this _____ day of _____, 2026.

Notary Public

My commission expires: _____

APPENDIX E**FORM OF CONTRACTOR AFFIDAVIT****ST. LOUIS COUNTY CODE SECTION 107.130 AND ST. LOUIS COUNTY CHARTER SECTION 12.020**

I SWEAR AND AFFIRM that the Contractor will comply with all requirements of Section 107.130 of the St. Louis County Code and St. Louis County Charter Section 12.020, specifically including but not limited to the following representations and obligations (with all terms as defined in Section 107.130):

- (i) That the Contractor has not been barred from bidding on any federal or State projects within the last year.
- (ii) That the Contractor has not had any State or County-issued business, trade, or contracting license suspended or revoked within the last year.
- (iii) That the Contractor has and enforces a drug-testing policy for all employees in the field.
- (iv) That the Contractor participates in or maintains its own Department of Labor-approved apprentice program for each craft which the Contractor employs and has active, registered apprentices for each program.
- (v) That all on-site employees on the project will be employees and that there will be no use of independent contractors or "leased employees" for on-site work.
- (vi) That all employees will be licensed with the appropriate licensing authority.
- (vii) That prevailing wages will be paid to all employees.
- (viii) That all employees and employee supervisors will be OSHA-certified in compliance with then-current OSHA safety requirements prior to working on the Project.
- (ix) That all employees will be ten-hour OSHA certified.
- (x) That all employee supervisors will be thirty-hour OSHA certified.
- (xi) That the Contractor, its subcontractors, and employees will comply with all applicable laws, ordinances, rules, and regulations governing the conduct of business in St. Louis County and the State of Missouri. This obligation includes compliance with the Toxic Substances Control Act (15 U.S.C. 2601 et seq.) and 40 CFR Part 761 as applicable to the Work.
- (xii) That all employees performing PCB remediation work on the Project will hold current 40-hour HAZWOPER training and current 8-hour annual refresher certification as required by 29 CFR 1910.120(e), and that documentation of such training will be maintained on site and available for review by the Owner, the Owner's Environmental Consultant, and regulatory authorities upon request.

Additional Certifications

The Contractor further swears and affirms as follows:

1. No Gratuities. The Contractor has not offered, given, or agreed to give any gratuity, gift, commission, or thing of value to any Owner representative, public official, or person involved in this procurement for the purpose of influencing award or administration of the Contract.
2. No Collusion. The Contractor has not colluded with any other bidder, proposer, contractor, subcontractor, supplier, or person in preparing or submitting its proposal.

No Discrimination. The Contractor will not discriminate on the basis of race, color, religion, creed, sex, sexual orientation, gender identity, age, ancestry, national origin, disability, or veteran status in performance of the Contract or in consideration of subcontracting, employment, or supplier opportunities.

Sworn and subscribed to before me this _____ day of _____, 2026.

Signature of Principal: _____

Printed Name: _____

Title: _____

Notary Public of _____

My commission expires: _____, 20_____

APPENDIX F

FEDERAL FUNDING REQUIREMENTS AND DAVIS-BACON WAGE DETERMINATION

The Project is funded in whole or in part by EPA Brownfields funding and other Owner-identified funding sources. The federal funding requirements in this Appendix apply to the Work. The applicable Davis-Bacon wage determination is attached as Appendix F-1 and is incorporated into the Contract Documents.

F.1 Equal Employment Opportunity

The Contractor will comply with Executive Order 11246 of September 24, 1965, entitled "Equal Employment Opportunity," as amended by Executive Order 11375 of October 13, 1967, and as supplemented in Department of Labor regulations (41 CFR Chapter 60).

F.2 Davis-Bacon Act and Copeland Anti-Kickback Act

The Contractor shall comply with the Davis-Bacon Act (40 U.S.C. 3141-3148), as supplemented by Department of Labor regulations at 29 CFR Part 5, and the Copeland Anti-Kickback Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations at 29 CFR Part 3. The Contractor shall comply with all requirements of 29 C.F.R. § 5.5 (attached hereto as Appendix F-2 and incorporated herein by reference), including but not limited to the payment of prevailing wages, the submission of weekly certified payrolls, the maintenance of payroll records for at least three years, and compliance with the Contract Work Hours and Safety Standards Act. The Contractor shall include the provisions of Appendix F-2 in all subcontracts at any tier and ensure strict compliance by all subcontractors.

F.3 Contract Work Hours and Safety Standards Act

The Contractor will comply with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702, the Contractor must compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week.

F.4 Clean Air Act and Federal Water Pollution Control Act

The Contractor agrees to comply with all applicable standards, orders, or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the awarding agency and the Regional Office of the Environmental Protection Agency.

F.5 Debarment and Suspension

The Contractor certifies that it is not debarred, suspended, or otherwise excluded from or ineligible for participation in federal assistance programs under Executive Order 12549 and Executive Order 12689.

F.6 Byrd Anti-Lobbying Amendment

The Contractor certifies that it will not and has not used federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress

in connection with obtaining any federal contract, grant, or any other award covered by 31 U.S.C. 1352.

F.7 Title VI of the Civil Rights Act of 1964

The Contractor will comply with Title VI of the Civil Rights Act of 1964 as codified in 42 U.S.C. 2000d et seq.

F.8 Telecommunications Prohibition

The Contractor agrees that it will not use telecommunications and video surveillance equipment and services as prohibited by 2 CFR 200.216 and 200.471.

F.9 Domestic Preferences

In accordance with 2 CFR 200.322, the Contractor should, to the greatest extent practicable, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States.

F.10 Buy America, Build America

LCRA received financial support from the U.S. Environmental Protection Agency (EPA) under an assistance agreement to procure the items in this Request for Proposals (RFP). As a result, the Build America, Buy America Act (BABA) may apply to the procurement of item(s) in this RFP. The LCRA is requesting bidders identify whether proposed items meet the criteria of BABA. A bidder that asserts the product can comply with BABA, may be asked to certify compliance, if selected. If the bidder cannot meet BABA requirements, the LCRA requests the bidder provide information as to what it would take to comply and the associated costs. Information about compliance with BABA can be found at <https://www.ecfr.gov/current/title-2/subtitleA/chapter-I/part-184> and <https://www.whitehouse.gov/wp-content/uploads/2023/10/M-24-02-Buy-America-Implementation-Guidance-Update.pdf>.

Bidder Acknowledgment:

Federal funding provisions apply. The Bidder acknowledges and agrees to comply with all provisions of this Appendix.

Signature: _____ Date: _____

Printed Name: _____

APPENDIX F-1
DAVIS-BACON WAGE DETERMINATION

"General Decision Number: MO20260089 05/18/2026"

State: Missouri

Construction Types: Building

Counties: Missouri Counties of
St Louis and Washington

Modification Number	Publication Date
0	01/02/2026
1	05/18/2026

ASBE0001-001 10/07/2024

Rates

Fringes

HEAT & FROST INSULATOR (INCLUDES DUCT, PIPE AND MECHANICAL SYSTEMS).....	\$ 43.48

27.24

BRM0001-009 06/04/2024

Rates

Fringes

BRICKLAYER.....	\$ 41.15

23.90

BRM0018-003 07/05/2023

Rates

Fringes

TILE SETTER.....	\$ 34.09

20.36

CARP1011-002 05/01/2024

Rates

Fringes

CARPENTER.....	\$ 39.78

22.40

CARP1310-002 05/01/2024

Rates

Fringes

FLOOR LAYER: SOFT FLOORS.....	\$ 40.08

21.85

ELEC0001-004 06/22/2025

Rates

Fringes

ELECTRICIAN (COMMUNICATION TECHNICIAN).....	\$ 49.29

33.64

ELEC0001-010 06/22/2025

Rates

Fringes

ELECTRICIAN.....	\$ 49.29

33.64

ELEV0003-004 01/01/2025

Rates

Fringes

ELEVATOR MECHANIC. FOOTNOTES: A. VACATION:
EMPLOYER CONTRIBUTES 8% OF BASIC HOURLY RATE AS
VACATION PAY CREDIT FOR MORE THAN 5 YEARS OF

SERVICE; AND 6% FOR 6 MONTHS TO 5 YEARS OF SERVICE.

B. PAID HOLIDAYS: NEW YEAR'S DAY, MEMORIAL DAY,
INDEPENDENCE DAY, LABOR DAY, VETERANS' DAY,
THANKSGIVING DAY, THE FRIDAY AFTER THANKSGIVING DAY
AND CHRISTMAS DAY.....\$ 62.73 38.44

ENGI0513-023 05/01/2024

Rates

Fringes

POWER EQUIPMENT OPERATOR: FORKLIFT.....\$ 43.46 30.22
POWER EQUIPMENT OPERATOR: BOBCAT/SKID STEER/SKID
LOADER.....\$ 43.46 30.22
POWER EQUIPMENT OPERATOR:
BACKHOE/EXCAVATOR/TRACKHOE.....\$ 43.46 30.22

ENGI0513-026 05/01/2025

Rates

Fringes

POWER EQUIPMENT OPERATOR: OILER.....\$ 39.06 30.38

ENGI0513-027 05/07/2025

Rates

Fringes

POWER EQUIPMENT OPERATOR: BULLDOZER.....\$ 45.96 30.57

ENGI0513-028 05/07/2025

Rates

Fringes

POWER EQUIPMENT OPERATOR: CRANE.....\$ 45.96 30.57

IRON0396-008 08/06/2025

Rates

Fringes

IRONWORKER.....\$ 44.27 31.65

LAB00110-007 06/04/2025

Rates

Fringes

LABORER: PIPELAYER.....\$ 40.82 17.56

LAB00110-009 03/01/2025

Rates

Fringes

LABORER, COMMON OR GENERAL (PROJECTS UNDER
2,000,000).....\$ 32.23 15.91
LABORER, COMMON OR GENERAL (PROJECTS OVER
\$20,000,000).....\$ 35.73 15.91
LABORER, COMMON OR GENERAL (PROJECTS BETWEEN
\$1,000,000 & \$20,000,000).....\$ 34.23 15.91

LAB01104-007 03/01/2025

Rates

Fringes

LABORER: MASON TENDER - CEMENT/CONCRETE.....\$ 31.80 14.91

PADC0058-001 09/01/2024

Rates

Fringes

PAINTER.....\$ 39.40 17.66

PLAS0527-005 04/01/2023

Rates

Fringes

CEMENT MASON/CONCRETE FINISHER.....\$ 38.46 20.15

PLUM0562-018 07/01/2025		
	Rates	Fringes
PIPEFITTER.....	\$ 52.60	29.93

PLUM0562-019 07/01/2025		
	Rates	Fringes
PLUMBER.....	\$ 52.60	29.93

ROOF0002-016 03/01/2025		
	Rates	Fringes
ROOFER.....	\$ 40.00	22.05

SFM00268-005 01/01/2025		
	Rates	Fringes
SPRINKLER FITTER.....	\$ 51.73	29.55

SHEE0036-036 08/01/2025		
	Rates	Fringes
SHEET METAL WORKER.....	\$ 52.00	27.12

UAVGM00002 01/01/2025		
	Rates	Fringes
OPERATOR: ROLLER.....	\$ 39.61	30.15

UAVGM00003 01/01/2025		
	Rates	Fringes
LABORER: MASON TENDER - BRICK.....	\$ 37.58	17.21

WELDERS - Receive rate prescribed for craft performing operation to which welding is incidental.

=====

Note: Executive Order (EO) 13706, Establishing Paid Sick Leave for Federal Contractors applies to all contracts subject to the Davis-Bacon Act for which the contract is awarded (and any solicitation was issued) on or after January 1, 2017. If this contract is covered by the EO, the contractor must provide employees with 1 hour of paid sick leave for every 30 hours they work, up to 56 hours of paid sick leave each year. Employees must be permitted to use paid sick leave for their own illness, injury or other health-related needs, including preventive care; to assist a family member (or person who is like family to the employee) who is ill, injured, or has other health-related needs, including preventive care; or for reasons resulting from, or to assist a family member (or person who is like family to the employee) who is a victim of, domestic violence, sexual assault, or stalking. Additional information on contractor requirements and worker protections under the EO is available at <https://www.dol.gov/agencies/whd/government-contracts>.

Note: Executive Order 13658 generally applies to contracts subject to the Davis-Bacon Act that were awarded on or between January 1, 2015 and January 29, 2022, and that have not been renewed or extended on or after January 30, 2022. Executive Order 13658 does not apply to contracts subject only to the Davis-Bacon Related Acts regardless of when they were awarded. If a contract is subject to Executive Order 13658, the contractor must pay all covered workers

at least \$13.65 per hour (or the applicable wage rate listed on this wage determination, if it is higher) for all hours spent performing on the contract from May 11, 2026, through December 31, 2026. The applicable Executive Order minimum wage rate will be adjusted annually. Additional information on contractor requirements and worker protections under Executive Order 13658 is available at www.dol.gov/whd/govcontracts.

Unlisted classifications needed for work not included within the scope of the classifications listed may be added after award only as provided in the labor standards contract clauses (29CFR 5.5 (a) (1) (iii)).

The body of each wage determination lists the classifications and wage rates that have been found to be prevailing for the type(s) of construction and geographic area covered by the wage determination. The classifications are listed in alphabetical order under rate identifiers indicating whether the particular rate is a union rate (current union negotiated rate), a survey rate, a weighted union average rate, a state adopted rate, or a supplemental classification rate.

Union Rate Identifiers

A four-letter identifier beginning with characters other than **SU**, **UAVG**, **SA**, or **SC** denotes that a union rate was prevailing for that classification in the survey. Example: PLUM0198-005 07/01/2024. PLUM is an identifier of the union whose collectively bargained rate prevailed in the survey for this classification, which in this example would be Plumbers. 0198 indicates the local union number or district council number where applicable, i.e., Plumbers Local 0198. The next number, 005 in the example, is an internal number used in processing the wage determination. The date, 07/01/2024 in the example, is the effective date of the most current negotiated rate.

Union prevailing wage rates are updated to reflect all changes over time that are reported to WHD in the rates in the collective bargaining agreement (CBA) governing the classification.

Union Average Rate Identifiers

The UAVG identifier indicates that no single rate prevailed for those classifications, but that 100% of the data reported for the classifications reflected union rates. EXAMPLE: UAVG-OH-0010 01/01/2024. UAVG indicates that the rate is a weighted union average rate. OH indicates the State of Ohio. The next number, 0010 in the example, is an internal number used in producing the wage determination. The date, 01/01/2024 in the example, indicates the date the wage determination was updated to reflect the most current union average rate.

A UAVG rate will be updated once a year, usually in January, to reflect a weighted average of the current rates in the collective bargaining agreements on which the rate is based.

Survey Rate Identifiers

The **SU** identifier indicates that either a single non-union rate prevailed (as defined in 29 CFR 1.2) for this classification in the survey or that the rate was derived by computing a weighted average rate based on all the rates reported in the survey for that classification. As a weighted

average rate includes all rates reported in the survey, it may include both union and non-union rates. Example: SUFL2022-007 6/27/2024. SU indicates the rate is a single non-union prevailing rate or a weighted average of survey data for that classification. FL indicates the State of Florida. 2022 is the year of the survey on which these classifications and rates are based. The next number, 007 in the example, is an internal number used in producing the wage determination. The date, 6/27/2024 in the example, indicates the survey completion date for the classifications and rates under that identifier.

◆SU◆ wage rates typically remain in effect until a new survey is conducted. However, the Wage and Hour Division (WHD) has the discretion to update such rates under 29 CFR 1.6(c)(1).

State Adopted Rate Identifiers

The ◆SA◆ identifier indicates that the classifications and prevailing wage rates set by a state (or local) government were adopted under 29 C.F.R 1.3(g)-(h). Example: SAME2023-007 01/03/2024. SA reflects that the rates are state adopted. ME refers to the State of Maine. 2023 is the year during which the state completed the survey on which the listed classifications and rates are based. The next number, 007 in the example, is an internal number used in producing the wage determination. The date, 01/03/2024 in the example, reflects the date on which the classifications and rates under the ◆SA◆ identifier took effect under state law in the state from which the rates were adopted.

WAGE DETERMINATION APPEALS PROCESS

1) Has there been an initial decision in the matter? This can be:

- a) a survey underlying a wage determination
- b) an existing published wage determination
- c) an initial WHD letter setting forth a position on a wage determination matter
- d) an initial conformance (additional classification and rate) determination

On survey related matters, initial contact, including requests for summaries of surveys, should be directed to the WHD Branch of Wage Surveys. Requests can be submitted via email to davisbaconinfo@dol.gov or by mail to:

Branch of Wage Surveys
Wage and Hour Division
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Regarding any other wage determination matter such as conformance decisions, requests for initial decisions should be directed to the WHD Branch of Construction Wage Determinations. Requests can be submitted via email to BCWD-Office@dol.gov or by mail to:

Branch of Construction Wage Determinations
Wage and Hour Division
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

2) If an initial decision has been issued, then any interested party (those affected by the action) that disagrees with the decision can request review and reconsideration from the Wage and Hour Administrator (See 29 CFR Part 1.8 and 29 CFR Part 7). Requests for review and reconsideration can be submitted via email to dba.reconsideration@dol.gov or by mail to:

Wage and Hour Administrator

U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

The request should be accompanied by a full statement of the interested party's position and any information (wage payment data, project description, area practice material, etc.) that the requestor considers relevant to the issue.

3) If the decision of the Administrator is not favorable, an interested party may appeal directly to the Administrative Review Board (formerly the Wage Appeals Board). Write to:

Administrative Review Board
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210.

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END OF GENERAL DECISION

"

APPENDIX F-2

DAVIS-BACON REQUIRED CONTRACT PROVISIONS

This content is from the eCFR and is authoritative but unofficial.

Title 29 — Labor

Subtitle A — Office of the Secretary of Labor

Part 5 — Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction (Also Labor Standards Provisions Applicable to Nonconstruction Contracts Subject to the Contract Work Hours and Safety Standards Act)

Subpart A — Davis-Bacon and Related Acts Provisions and Procedures

Source: 48 FR 19540, Apr. 29, 1983, unless otherwise noted.

Authority: 5 U.S.C. 301; Reorganization Plan No. 14 of 1950, 5 U.S.C. appendix; 28 U.S.C. 2461 note; 40 U.S.C. 3141 *et seq.*; 40 U.S.C. 3145; 40 U.S.C. 3148; 40 U.S.C. 3701 *et seq.*; Secretary's Order No. 01-2014, 79 FR 77527; and the laws referenced by § 5.1(a).

Source: 48 FR 19541, Apr. 29, 1983, unless otherwise noted.

Editorial Note: Nomenclature changes to subpart A of part 5 appear at 61 FR 19984, May 3, 1996.

§ 5.5 Contract provisions and related matters.

(a) **Required contract clauses.** The Agency head will cause or require the contracting officer to require the contracting officer to insert in full, or (for contracts covered by the Federal Acquisition Regulation (48 CFR chapter 1)) by reference, in any contract in excess of \$2,000 which is entered into for the actual construction, alteration and/or repair, including painting and decorating, of a public building or public work, or building or work financed in whole or in part from Federal funds or in accordance with guarantees of a Federal agency or financed from funds obtained by pledge of any contract of a Federal agency to make a loan, grant or annual contribution (except where a different meaning is expressly indicated), and which is subject to the labor standards provisions of any of the laws referenced by § 5.1, the following clauses (or any modifications thereof to meet the particular needs of the agency, *Provided*, That such modifications are first approved by the Department of Labor):

(1) **Minimum wages —**

(i) **Wage rates and fringe benefits.** All laborers and mechanics employed or working upon the site of the work (or otherwise working in construction or development of the project under a development statute), will be paid unconditionally and not less often than once a week, and without subsequent deduction or rebate on any account (except such payroll deductions as are permitted by regulations issued by the Secretary of Labor under the Copeland Act (29 CFR part 3)), the full amount of basic hourly wages and bona fide fringe benefits (or cash equivalents thereof) due at time of payment computed at rates not less than those contained in the wage determination of the Secretary of Labor which is attached hereto and made a part hereof, regardless of any contractual relationship which may be alleged to exist between the contractor and such laborers and mechanics. As provided in paragraphs (d) and (e) of this section, the appropriate wage determinations are effective by operation of law even if they have not been attached to the contract. Contributions made or costs reasonably anticipated for bona fide fringe benefits under the Davis-Bacon Act (40 U.S.C. 3141(2)(B)) on behalf of laborers or mechanics are considered wages paid to such laborers or mechanics, subject to the provisions of paragraph (a)(1)(v) of this section; also, regular contributions made or costs incurred for more than a weekly period (but not less often than quarterly) under plans, funds, or programs which cover the particular weekly period, are deemed to be constructively made or incurred

during such weekly period. Such laborers and mechanics must be paid the appropriate wage rate and fringe benefits on the wage determination for the classification(s) of work actually performed, without regard to skill, except as provided in paragraph (a)(4) of this section. Laborers or mechanics performing work in more than one classification may be compensated at the rate specified for each classification for the time actually worked therein: *Provided*, That the employer's payroll records accurately set forth the time spent in each classification in which work is performed. The wage determination (including any additional classifications and wage rates conformed under paragraph (a)(1)(iii) of this section) and the Davis-Bacon poster (WH-1321) must be posted at all times by the contractor and its subcontractors at the site of the work in a prominent and accessible place where it can be easily seen by the workers.

(ii) Frequently recurring classifications.

- (A)** In addition to wage and fringe benefit rates that have been determined to be prevailing under the procedures set forth in 29 CFR part 1, a wage determination may contain, pursuant to § 1.3(f), wage and fringe benefit rates for classifications of laborers and mechanics for which conformance requests are regularly submitted pursuant to paragraph (a)(1)(iii) of this section, provided that:
 - (1)** The work performed by the classification is not performed by a classification in the wage determination for which a prevailing wage rate has been determined;
 - (2)** The classification is used in the area by the construction industry; and
 - (3)** The wage rate for the classification bears a reasonable relationship to the prevailing wage rates contained in the wage determination.
- (B)** The Administrator will establish wage rates for such classifications in accordance with paragraph (a)(1)(iii)(A)(3) of this section. Work performed in such a classification must be paid at no less than the wage and fringe benefit rate listed on the wage determination for such classification.

(iii) Conformance.

- (A)** The contracting officer must require that any class of laborers or mechanics, including helpers, which is not listed in the wage determination and which is to be employed under the contract be classified in conformance with the wage determination. Conformance of an additional classification and wage rate and fringe benefits is appropriate only when the following criteria have been met:
 - (1)** The work to be performed by the classification requested is not performed by a classification in the wage determination; and
 - (2)** The classification is used in the area by the construction industry; and
 - (3)** The proposed wage rate, including any bona fide fringe benefits, bears a reasonable relationship to the wage rates contained in the wage determination.
- (B)** The conformance process may not be used to split, subdivide, or otherwise avoid application of classifications listed in the wage determination.
- (C)** If the contractor and the laborers and mechanics to be employed in the classification (if known), or their representatives, and the contracting officer agree on the classification and wage rate (including the amount designated for fringe benefits where appropriate), a

report of the action taken will be sent by the contracting officer by email to DBAconformance@dol.gov. The Administrator, or an authorized representative, will approve, modify, or disapprove every additional classification action within 30 days of receipt and so advise the contracting officer or will notify the contracting officer within the 30-day period that additional time is necessary.

- (D) In the event the contractor, the laborers or mechanics to be employed in the classification or their representatives, and the contracting officer do not agree on the proposed classification and wage rate (including the amount designated for fringe benefits, where appropriate), the contracting officer will, by email to DBAconformance@dol.gov, refer the questions, including the views of all interested parties and the recommendation of the contracting officer, to the Administrator for determination. The Administrator, or an authorized representative, will issue a determination within 30 days of receipt and so advise the contracting officer or will notify the contracting officer within the 30-day period that additional time is necessary.
 - (E) The contracting officer must promptly notify the contractor of the action taken by the Wage and Hour Division under paragraphs (a)(1)(iii)(C) and (D) of this section. The contractor must furnish a written copy of such determination to each affected worker or it must be posted as a part of the wage determination. The wage rate (including fringe benefits where appropriate) determined pursuant to paragraph (a)(1)(iii)(C) or (D) of this section must be paid to all workers performing work in the classification under this contract from the first day on which work is performed in the classification.
 - (iv) **Fringe benefits not expressed as an hourly rate.** Whenever the minimum wage rate prescribed in the contract for a class of laborers or mechanics includes a fringe benefit which is not expressed as an hourly rate, the contractor may either pay the benefit as stated in the wage determination or may pay another bona fide fringe benefit or an hourly cash equivalent thereof.
 - (v) **Unfunded plans.** If the contractor does not make payments to a trustee or other third person, the contractor may consider as part of the wages of any laborer or mechanic the amount of any costs reasonably anticipated in providing bona fide fringe benefits under a plan or program, *Provided*, That the Secretary of Labor has found, upon the written request of the contractor, in accordance with the criteria set forth in § 5.28, that the applicable standards of the Davis-Bacon Act have been met. The Secretary of Labor may require the contractor to set aside in a separate account assets for the meeting of obligations under the plan or program.
 - (vi) **Interest.** In the event of a failure to pay all or part of the wages required by the contract, the contractor will be required to pay interest on any underpayment of wages.
- (2) **Withholding –**
- (i) **Withholding requirements.** The [write in name of Federal agency or the recipient of Federal assistance] may, upon its own action, or must, upon written request of an authorized representative of the Department of Labor, withhold or cause to be withheld from the contractor so much of the accrued payments or advances as may be considered necessary to satisfy the liabilities of the prime contractor or any subcontractor for the full amount of wages and monetary relief, including interest, required by the clauses set forth in paragraph (a) of this section for violations of this contract, or to satisfy any such liabilities required by any other Federal contract, or federally assisted contract subject to Davis-Bacon labor standards, that is held by the same prime contractor (as defined in § 5.2). The necessary funds may be withheld

from the contractor under this contract, any other Federal contract with the same prime contractor, or any other federally assisted contract that is subject to Davis-Bacon labor standards requirements and is held by the same prime contractor, regardless of whether the other contract was awarded or assisted by the same agency, and such funds may be used to satisfy the contractor liability for which the funds were withheld. In the event of a contractor's failure to pay any laborer or mechanic, including any apprentice or helper working on the site of the work (or otherwise working in construction or development of the project under a development statute) all or part of the wages required by the contract, or upon the contractor's failure to submit the required records as discussed in paragraph (a)(3)(iv) of this section, the [Agency] may on its own initiative and after written notice to the contractor, sponsor, applicant, owner, or other entity, as the case may be, take such action as may be necessary to cause the suspension of any further payment, advance, or guarantee of funds until such violations have ceased.

(ii) **Priority to withheld funds.** The Department has priority to funds withheld or to be withheld in accordance with paragraph (a)(2)(i) or (b)(3)(i) of this section, or both, over claims to those funds by:

- (A) A contractor's surety(ies), including without limitation performance bond sureties and payment bond sureties;
- (B) A contracting agency for its procurement costs;
- (C) A trustee(s) (either a court-appointed trustee or a U.S. trustee, or both) in bankruptcy of a contractor, or a contractor's bankruptcy estate;
- (D) A contractor's assignee(s);
- (E) A contractor's successor(s); or
- (F) A claim asserted under the Prompt Payment Act, 31 U.S.C. 3901-3907.

(3) **Records and certified payrolls —**

(i) **Basic record requirements —**

- (A) **Length of record retention.** All regular payrolls and other basic records must be maintained by the contractor and any subcontractor during the course of the work and preserved for all laborers and mechanics working at the site of the work (or otherwise working in construction or development of the project under a development statute) for a period of at least 3 years after all the work on the prime contract is completed.
- (B) **Information required.** Such records must contain the name; Social Security number; last known address, telephone number, and email address of each such worker; each worker's correct classification(s) of work actually performed; hourly rates of wages paid (including rates of contributions or costs anticipated for bona fide fringe benefits or cash equivalents thereof of the types described in 40 U.S.C. 3141(2)(B) of the Davis-Bacon Act); daily and weekly number of hours actually worked in total and on each covered contract; deductions made; and actual wages paid.
- (C) **Additional records relating to fringe benefits.** Whenever the Secretary of Labor has found under paragraph (a)(1)(v) of this section that the wages of any laborer or mechanic include the amount of any costs reasonably anticipated in providing benefits under a plan

or program described in 40 U.S.C. 3141(2)(B) of the Davis-Bacon Act, the contractor must maintain records which show that the commitment to provide such benefits is enforceable, that the plan or program is financially responsible, and that the plan or program has been communicated in writing to the laborers or mechanics affected, and records which show the costs anticipated or the actual cost incurred in providing such benefits.

(D) ***Additional records relating to apprenticeship.*** Contractors with apprentices working under approved programs must maintain written evidence of the registration of apprenticeship programs, the registration of the apprentices, and the ratios and wage rates prescribed in the applicable programs.

(ii) ***Certified payroll requirements –***

(A) ***Frequency and method of submission.*** The contractor or subcontractor must submit weekly, for each week in which any DBA- or Related Acts-covered work is performed, certified payrolls to the [write in name of appropriate Federal agency] if the agency is a party to the contract, but if the agency is not such a party, the contractor will submit the certified payrolls to the applicant, sponsor, owner, or other entity, as the case may be, that maintains such records, for transmission to the [write in name of agency]. The prime contractor is responsible for the submission of all certified payrolls by all subcontractors. A contracting agency or prime contractor may permit or require contractors to submit certified payrolls through an electronic system, as long as the electronic system requires a legally valid electronic signature; the system allows the contractor, the contracting agency, and the Department of Labor to access the certified payrolls upon request for at least 3 years after the work on the prime contract has been completed; and the contracting agency or prime contractor permits other methods of submission in situations where the contractor is unable or limited in its ability to use or access the electronic system.

(B) ***Information required.*** The certified payrolls submitted must set out accurately and completely all of the information required to be maintained under paragraph (a)(3)(i)(B) of this section, except that full Social Security numbers and last known addresses, telephone numbers, and email addresses must not be included on weekly transmittals. Instead, the certified payrolls need only include an individually identifying number for each worker (e.g., the last four digits of the worker's Social Security number). The required weekly certified payroll information may be submitted using Optional Form WH-347 or in any other format desired. Optional Form WH-347 is available for this purpose from the Wage and Hour Division website at <https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/wh347/.pdf> or its successor website. It is not a violation of this section for a prime contractor to require a subcontractor to provide full Social Security numbers and last known addresses, telephone numbers, and email addresses to the prime contractor for its own records, without weekly submission by the subcontractor to the sponsoring government agency (or the applicant, sponsor, owner, or other entity, as the case may be, that maintains such records).

(C) ***Statement of Compliance.*** Each certified payroll submitted must be accompanied by a "Statement of Compliance," signed by the contractor or subcontractor, or the contractor's or subcontractor's agent who pays or supervises the payment of the persons working on the contract, and must certify the following:

- (1) That the certified payroll for the payroll period contains the information required to be provided under paragraph (a)(3)(ii) of this section, the appropriate information and basic records are being maintained under paragraph (a)(3)(i) of this section, and such information and records are correct and complete;
 - (2) That each laborer or mechanic (including each helper and apprentice) working on the contract during the payroll period has been paid the full weekly wages earned, without rebate, either directly or indirectly, and that no deductions have been made either directly or indirectly from the full wages earned, other than permissible deductions as set forth in 29 CFR part 3; and
 - (3) That each laborer or mechanic has been paid not less than the applicable wage rates and fringe benefits or cash equivalents for the classification(s) of work actually performed, as specified in the applicable wage determination incorporated into the contract.
- (D) **Use of Optional Form WH-347.** The weekly submission of a properly executed certification set forth on the reverse side of Optional Form WH-347 will satisfy the requirement for submission of the "Statement of Compliance" required by paragraph (a)(3)(ii)(C) of this section.
- (E) **Signature.** The signature by the contractor, subcontractor, or the contractor's or subcontractor's agent must be an original handwritten signature or a legally valid electronic signature.
- (F) **Falsification.** The falsification of any of the above certifications may subject the contractor or subcontractor to civil or criminal prosecution under 18 U.S.C. 1001 and 31 U.S.C. 3729.
- (G) **Length of certified payroll retention.** The contractor or subcontractor must preserve all certified payrolls during the course of the work and for a period of 3 years after all the work on the prime contract is completed.
- (iii) **Contracts, subcontracts, and related documents.** The contractor or subcontractor must maintain this contract or subcontract and related documents including, without limitation, bids, proposals, amendments, modifications, and extensions. The contractor or subcontractor must preserve these contracts, subcontracts, and related documents during the course of the work and for a period of 3 years after all the work on the prime contract is completed.
- (iv) **Required disclosures and access —**
- (A) **Required record disclosures and access to workers.** The contractor or subcontractor must make the records required under paragraphs (a)(3)(i) through (iii) of this section, and any other documents that the [write the name of the agency] or the Department of Labor deems necessary to determine compliance with the labor standards provisions of any of the applicable statutes referenced by § 5.1, available for inspection, copying, or transcription by authorized representatives of the [write the name of the agency] or the Department of Labor, and must permit such representatives to interview workers during working hours on the job.
 - (B) **Sanctions for non-compliance with records and worker access requirements.** If the contractor or subcontractor fails to submit the required records or to make them available, or refuses to permit worker interviews during working hours on the job, the Federal agency

may, after written notice to the contractor, sponsor, applicant, owner, or other entity, as the case may be, that maintains such records or that employs such workers, take such action as may be necessary to cause the suspension of any further payment, advance, or guarantee of funds. Furthermore, failure to submit the required records upon request or to make such records available, or to permit worker interviews during working hours on the job, may be grounds for debarment action pursuant to § 5.12. In addition, any contractor or other person that fails to submit the required records or make those records available to WHD within the time WHD requests that the records be produced will be precluded from introducing as evidence in an administrative proceeding under 29 CFR part 6 any of the required records that were not provided or made available to WHD. WHD will take into consideration a reasonable request from the contractor or person for an extension of the time for submission of records. WHD will determine the reasonableness of the request and may consider, among other things, the location of the records and the volume of production.

- (C) **Required information disclosures.** Contractors and subcontractors must maintain the full Social Security number and last known address, telephone number, and email address of each covered worker, and must provide them upon request to the [write in name of appropriate Federal agency] if the agency is a party to the contract, or to the Wage and Hour Division of the Department of Labor. If the Federal agency is not such a party to the contract, the contractor, subcontractor, or both, must, upon request, provide the full Social Security number and last known address, telephone number, and email address of each covered worker to the applicant, sponsor, owner, or other entity, as the case may be, that maintains such records, for transmission to the [write in name of agency], the contractor, or the Wage and Hour Division of the Department of Labor for purposes of an investigation or other compliance action.

(4) **Apprentices and equal employment opportunity –**

(i) **Apprentices –**

- (A) **Rate of pay.** Apprentices will be permitted to work at less than the predetermined rate for the work they perform when they are employed pursuant to and individually registered in a bona fide apprenticeship program registered with the U.S. Department of Labor, Employment and Training Administration, Office of Apprenticeship (OA), or with a State Apprenticeship Agency recognized by the OA. A person who is not individually registered in the program, but who has been certified by the OA or a State Apprenticeship Agency (where appropriate) to be eligible for probationary employment as an apprentice, will be permitted to work at less than the predetermined rate for the work they perform in the first 90 days of probationary employment as an apprentice in such a program. In the event the OA or a State Apprenticeship Agency recognized by the OA withdraws approval of an apprenticeship program, the contractor will no longer be permitted to use apprentices at less than the applicable predetermined rate for the work performed until an acceptable program is approved.
- (B) **Fringe benefits.** Apprentices must be paid fringe benefits in accordance with the provisions of the apprenticeship program. If the apprenticeship program does not specify fringe benefits, apprentices must be paid the full amount of fringe benefits listed on the wage

determination for the applicable classification. If the Administrator determines that a different practice prevails for the applicable apprentice classification, fringe benefits must be paid in accordance with that determination.

- (C) **Apprenticeship ratio.** The allowable ratio of apprentices to journeyworkers on the job site in any craft classification must not be greater than the ratio permitted to the contractor as to the entire work force under the registered program or the ratio applicable to the locality of the project pursuant to paragraph (a)(4)(i)(D) of this section. Any worker listed on a payroll at an apprentice wage rate, who is not registered or otherwise employed as stated in paragraph (a)(4)(i)(A) of this section, must be paid not less than the applicable wage rate on the wage determination for the classification of work actually performed. In addition, any apprentice performing work on the job site in excess of the ratio permitted under this section must be paid not less than the applicable wage rate on the wage determination for the work actually performed.
- (D) **Reciprocity of ratios and wage rates.** Where a contractor is performing construction on a project in a locality other than the locality in which its program is registered, the ratios and wage rates (expressed in percentages of the journeyworker's hourly rate) applicable within the locality in which the construction is being performed must be observed. If there is no applicable ratio or wage rate for the locality of the project, the ratio and wage rate specified in the contractor's registered program must be observed.
- (ii) **Equal employment opportunity.** The use of apprentices and journeyworkers under this part must be in conformity with the equal employment opportunity requirements of Executive Order 11246, as amended, and 29 CFR part 30.
- (5) **Compliance with Copeland Act requirements.** The contractor shall comply with the requirements of 29 CFR part 3, which are incorporated by reference in this contract.
- (6) **Subcontracts.** The contractor or subcontractor must insert in any subcontracts the clauses contained in paragraphs (a)(1) through (11) of this section, along with the applicable wage determination(s) and such other clauses or contract modifications as the [write in the name of the Federal agency] may by appropriate instructions require, and a clause requiring the subcontractors to include these clauses and wage determination(s) in any lower tier subcontracts. The prime contractor is responsible for the compliance by any subcontractor or lower tier subcontractor with all the contract clauses in this section. In the event of any violations of these clauses, the prime contractor and any subcontractor(s) responsible will be liable for any unpaid wages and monetary relief, including interest from the date of the underpayment or loss, due to any workers of lower-tier subcontractors, and may be subject to debarment, as appropriate.
- (7) **Contract termination: debarment.** A breach of the contract clauses in 29 CFR 5.5 may be grounds for termination of the contract, and for debarment as a contractor and a subcontractor as provided in 29 CFR 5.12.
- (8) **Compliance with Davis-Bacon and Related Act requirements.** All rulings and interpretations of the Davis-Bacon and Related Acts contained in 29 CFR parts 1, 3, and 5 are herein incorporated by reference in this contract.
- (9) **Disputes concerning labor standards.** Disputes arising out of the labor standards provisions of this contract shall not be subject to the general disputes clause of this contract. Such disputes shall be resolved in accordance with the procedures of the Department of Labor set forth in 29 CFR parts 5,

6, and 7. Disputes within the meaning of this clause include disputes between the contractor (or any of its subcontractors) and the contracting agency, the U.S. Department of Labor, or the employees or their representatives.

(10) **Certification of eligibility.**

- (i) By entering into this contract, the contractor certifies that neither it nor any person or firm who has an interest in the contractor's firm is a person or firm ineligible to be awarded Government contracts by virtue of 40 U.S.C. 3144(b) or § 5.12(a).
- (ii) No part of this contract shall be subcontracted to any person or firm ineligible for award of a Government contract by virtue of 40 U.S.C. 3144(b) or § 5.12(a).
- (iii) The penalty for making false statements is prescribed in the U.S. Code, Title 18 Crimes and Criminal Procedure, 18 U.S.C. 1001.

(11) **Anti-retaliation.** It is unlawful for any person to discharge, demote, intimidate, threaten, restrain, coerce, blacklist, harass, or in any other manner discriminate against, or to cause any person to discharge, demote, intimidate, threaten, restrain, coerce, blacklist, harass, or in any other manner discriminate against, any worker or job applicant for:

- (i) Notifying any contractor of any conduct which the worker reasonably believes constitutes a violation of the DBA, Related Acts, this part, or 29 CFR part 1 or 3;
- (ii) Filing any complaint, initiating or causing to be initiated any proceeding, or otherwise asserting or seeking to assert on behalf of themselves or others any right or protection under the DBA, Related Acts, this part, or 29 CFR part 1 or 3;
- (iii) Cooperating in any investigation or other compliance action, or testifying in any proceeding under the DBA, Related Acts, this part, or 29 CFR part 1 or 3; or
- (iv) Informing any other person about their rights under the DBA, Related Acts, this part, or 29 CFR part 1 or 3.

(b) **Contract Work Hours and Safety Standards Act (CWHSSA).** The Agency Head must cause or require the contracting officer to insert the following clauses set forth in paragraphs (b)(1) through (5) of this section in full, or (for contracts covered by the Federal Acquisition Regulation) by reference, in any contract in an amount in excess of \$100,000 and subject to the overtime provisions of the Contract Work Hours and Safety Standards Act. These clauses must be inserted in addition to the clauses required by paragraph (a) of this section or 29 CFR 4.6. As used in this paragraph (b), the terms "laborers and mechanics" include watchpersons and guards.

- (1) **Overtime requirements.** No contractor or subcontractor contracting for any part of the contract work which may require or involve the employment of laborers or mechanics shall require or permit any such laborer or mechanic in any workweek in which he or she is employed on such work to work in excess of forty hours in such workweek unless such laborer or mechanic receives compensation at a rate not less than one and one-half times the basic rate of pay for all hours worked in excess of forty hours in such workweek.
- (2) **Violation; liability for unpaid wages; liquidated damages.** In the event of any violation of the clause set forth in paragraph (b)(1) of this section the contractor and any subcontractor responsible therefor shall be liable for the unpaid wages and interest from the date of the underpayment. In addition, such contractor and subcontractor shall be liable to the United States (in the case of work done

under contract for the District of Columbia or a territory, to such District or to such territory), for liquidated damages. Such liquidated damages shall be computed with respect to each individual laborer or mechanic, including watchpersons and guards, employed in violation of the clause set forth in paragraph (b)(1) of this section, in the sum of \$33 for each calendar day on which such individual was required or permitted to work in excess of the standard workweek of forty hours without payment of the overtime wages required by the clause set forth in paragraph (b)(1).

(3) Withholding for unpaid wages and liquidated damages –

(i) **Withholding process.** The [write in the name of the Federal agency or the recipient of Federal assistance] may, upon its own action, or must, upon written request of an authorized representative of the Department of Labor, withhold or cause to be withheld from the contractor so much of the accrued payments or advances as may be considered necessary to satisfy the liabilities of the prime contractor or any subcontractor for any unpaid wages; monetary relief, including interest; and liquidated damages required by the clauses set forth in this paragraph (b) on this contract, any other Federal contract with the same prime contractor, or any other federally assisted contract subject to the Contract Work Hours and Safety Standards Act that is held by the same prime contractor (as defined in § 5.2). The necessary funds may be withheld from the contractor under this contract, any other Federal contract with the same prime contractor, or any other federally assisted contract that is subject to the Contract Work Hours and Safety Standards Act and is held by the same prime contractor, regardless of whether the other contract was awarded or assisted by the same agency, and such funds may be used to satisfy the contractor liability for which the funds were withheld.

(ii) **Priority to withheld funds.** The Department has priority to funds withheld or to be withheld in accordance with paragraph (a)(2)(i) or (b)(3)(i) of this section, or both, over claims to those funds by:

- (A) A contractor's surety(ies), including without limitation performance bond sureties and payment bond sureties;
- (B) A contracting agency for its procurement costs;
- (C) A trustee(s) (either a court-appointed trustee or a U.S. trustee, or both) in bankruptcy of a contractor, or a contractor's bankruptcy estate;
- (D) A contractor's assignee(s);
- (E) A contractor's successor(s); or
- (F) A claim asserted under the Prompt Payment Act, 31 U.S.C. 3901-3907.

(4) **Subcontracts.** The contractor or subcontractor must insert in any subcontracts the clauses set forth in paragraphs (b)(1) through (5) of this section and a clause requiring the subcontractors to include these clauses in any lower tier subcontracts. The prime contractor is responsible for compliance by any subcontractor or lower tier subcontractor with the clauses set forth in paragraphs (b)(1) through (5). In the event of any violations of these clauses, the prime contractor and any subcontractor(s) responsible will be liable for any unpaid wages and monetary relief, including interest from the date of the underpayment or loss, due to any workers of lower-tier subcontractors, and associated liquidated damages and may be subject to debarment, as appropriate.

- (5) **Anti-retaliation.** It is unlawful for any person to discharge, demote, intimidate, threaten, restrain, coerce, blacklist, harass, or in any other manner discriminate against, or to cause any person to discharge, demote, intimidate, threaten, restrain, coerce, blacklist, harass, or in any other manner discriminate against, any worker or job applicant for:
- (i) Notifying any contractor of any conduct which the worker reasonably believes constitutes a violation of the Contract Work Hours and Safety Standards Act (CWHSSA) or its implementing regulations in this part;
 - (ii) Filing any complaint, initiating or causing to be initiated any proceeding, or otherwise asserting or seeking to assert on behalf of themselves or others any right or protection under CWHSSA or this part;
 - (iii) Cooperating in any investigation or other compliance action, or testifying in any proceeding under CWHSSA or this part; or
 - (iv) Informing any other person about their rights under CWHSSA or this part.

(c) **CWHSSA required records clause.** In addition to the clauses contained in paragraph (b) of this section, in any contract subject only to the Contract Work Hours and Safety Standards Act and not to any of the other laws referenced by § 5.1, the Agency Head must cause or require the contracting officer to insert a clause requiring that the contractor or subcontractor must maintain regular payrolls and other basic records during the course of the work and must preserve them for a period of 3 years after all the work on the prime contract is completed for all laborers and mechanics, including guards and watchpersons, working on the contract. Such records must contain the name; last known address, telephone number, and email address; and social security number of each such worker; each worker's correct classification(s) of work actually performed; hourly rates of wages paid; daily and weekly number of hours actually worked; deductions made; and actual wages paid. Further, the Agency Head must cause or require the contracting officer to insert in any such contract a clause providing that the records to be maintained under this paragraph must be made available by the contractor or subcontractor for inspection, copying, or transcription by authorized representatives of the (write the name of agency) and the Department of Labor, and the contractor or subcontractor will permit such representatives to interview workers during working hours on the job.

(d) **Incorporation of contract clauses and wage determinations by reference.** Although agencies are required to insert the contract clauses set forth in this section, along with appropriate wage determinations, in full into covered contracts, and contractors and subcontractors are required to insert them in any lower-tier subcontracts, the incorporation by reference of the required contract clauses and appropriate wage determinations will be given the same force and effect as if they were inserted in full text.

(e) **Incorporation by operation of law.** The contract clauses set forth in this section (or their equivalent under the Federal Acquisition Regulation), along with the correct wage determinations, will be considered to be a part of every prime contract required by the applicable statutes referenced by § 5.1 to include such clauses, and will be effective by operation of law, whether or not they are included or incorporated by reference into such contract, unless the Administrator grants a variance, tolerance, or exemption from the application of this paragraph. Where the clauses and applicable wage determinations are effective by operation of law under this paragraph, the prime contractor must be compensated for any resulting increase in wages in accordance with applicable law.

(The information collection, recordkeeping, and reporting requirements contained in the following paragraphs of this section were approved by the Office of Management and Budget:

Paragraph	OMB Control No.
(a)(1)(ii)(B)	1235-0023
(a)(1)(ii)(C)	1235-0023
(a)(1)(iv)	1235-0023
(a)(3)(i)	1235-0023
(a)(3)(ii)(A)	1235-0023
	1235-0008
(c)	1235-0023

[48 FR 19540, Apr. 29, 1983, as amended at 51 FR 12265, Apr. 9, 1986; 55 FR 50150, Dec. 4, 1990; 57 FR 28776, June 26, 1992; 58 FR 58955, Nov. 5, 1993; 61 FR 40716, Aug. 5, 1996; 65 FR 69693, Nov. 20, 2000; 73 FR 77511, Dec. 19, 2008; 81 FR 43450, July 1, 2016; 82 FR 2225, 2226, Jan. 9, 2017; 83 FR 12, Jan 2, 2018; 84 FR 218, Jan. 23, 2019; 87 FR 2334, Jan. 14, 2022; 88 FR 2215, Jan. 13, 2023; 88 FR 57734, Aug. 23, 2023; 89 FR 1815, Jan. 11, 2024; 90 FR 1859, Jan. 10, 2025]

APPENDIX G

PREVAILING WAGE ORDER & APPLICABLE LEGAL PROVISIONS

The Missouri Annual Wage Order for St. Louis County, issued by the Missouri Department of Labor and Industrial Relations, Division of Labor Standards, is attached as Appendix G-1 and incorporated into the Contract Documents.

The Contractor shall post the applicable prevailing wage rates in a prominent and accessible location at the Project site throughout the duration of the Work. The Contractor shall submit certified payroll records to the Owner on a frequency and in a format consistent with Missouri law and the Contract Documents.

NOTE TO BIDDERS: The Prevailing Wage Order applicable to this Project will be the Annual Wage Order in effect at the time the contract is executed, or as otherwise required by Missouri law. It is the bidder's responsibility to confirm with the Missouri Department of Labor and Industrial Relations – Division of Labor Standards that the attached applicable Annual Wage Order for St. Louis County remains current as of the date the bid is submitted, and to post all required notices at the job site.

It is the bidder's responsibility to use its best efforts to provide a preference for the purchase, acquisition, and use of goods, products, materials, etc. produced within the United States, in the performance of this Agreement pursuant to 2 CFR §200.322. The bidder must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition where the purchase price exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000, procuring solid waste management services in a manner that maximizes energy and resource recovery, and establishing an affirmative procurement program for procurement of recovered materials identified in EPA guidelines. The bidder will follow all applicable environmental requirements, which includes the Clean Air Act (42 U.S.C.A. §7401 et seq.) ("CAA"); Federal Water Pollution Control Act and amendments (33 U.S.C.A. §1251 et seq.) ("Clean Water Act" or "CWA"); and regulations, rules, guidelines, or standards promulgated pursuant to such laws, statute and regulations, as such statutes, regulations, rules, guidelines, and standards, as amended from time to time. The bidder will comply with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702, the bidder is required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. Finally, the bidder will comply with the Davis Bacon Act and Title VI of the Civil Rights Act of 1964 as codified in 42 U.S.C. §2000d et seq. and agrees that it will not use telecommunications and video surveillance equipment and services as prohibited by 2 CFR §200.216 and §200.471.

Bidder Acknowledgment:

The Bidder acknowledges that the prevailing wage rates will apply to all on-site labor performed under this Contract and that the Bidder's proposed labor rates on Exhibit X-2 reflect compliance with the applicable prevailing wage requirements.

Signature: _____ Date: _____

Printed Name: _____

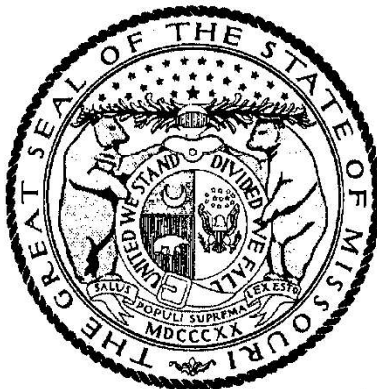
APPENDIX G-1

MISSOURI ANNUAL WAGE ORDER FOR ST. LOUIS COUNTY

Missouri

Division of Labor Standards

WAGE AND HOUR SECTION



MIKE KEHOE, Governor

Annual Wage Order No. 33

Section 100
ST. LOUIS COUNTY

In accordance with Section 290.262 RSMo 2000, within thirty (30) days after a certified copy of this Annual Wage Order has been filed with the Secretary of State as indicated below, any person who may be affected by this Annual Wage Order may object by filing an objection in triplicate with the Labor and Industrial Relations Commission, P.O. Box 599, Jefferson City, MO 65102-0599. Such objections must set forth in writing the specific grounds of objection. Each objection shall certify that a copy has been furnished to the Division of Labor Standards, P.O. Box 449, Jefferson City, MO 65102-0449 pursuant to 8 CSR 20-5.010(1). A certified copy of the Annual Wage Order has been filed with the Secretary of State of Missouri.

Original Signed by

Logan Hobbs, Director
Division of Labor Standards

Filed With Secretary of State: March 10, 2026

Last Date Objections May Be Filed: April 9, 2026

Prepared by Missouri Department of Labor and Industrial Relations

ST. LOUIS COUNTY

OCCUPATIONAL TITLE	**Prevailing Hourly Rate
Asbestos Worker	\$72.26
Boilermaker	\$44.93*
Bricklayer - Stone Mason	\$65.89
Carpenter	\$69.38
Lather	
Linoleum Layers & Cutter	
Millwright	
Pile Driver	
Cement Mason	\$61.40
Plasterer	
Communication Technician	\$67.84
Electrician (Inside Wireman)	\$79.41
Electrician (Outside Lineman)	\$44.93*
Outside - Groundman	
Outside - Groundman Tree Trimmer	
Outside - Lineman Operator	
Outside - Lineman Tree Trimmer	
Elevator Constructor	\$106.30
Glazier	\$71.63
Iron Worker	\$75.80
Laborer	\$58.92
Laborer - First Semi-Skilled	
Laborer - General	
Laborer - Second Semi-Skilled	
Laborer - Skilled	
Mason	\$57.31
Marble Finisher	
Marble Mason	
Terrazzo Finisher	
Terrazzo Worker	
Tile Finisher	
Tile Setter	
Operating Engineer	\$76.62
Operating Engineer - Group I	
Operating Engineer - Group II	
Operating Engineer - Group III	
Operating Engineer - Group III - A	
Operating Engineer - Group IV	
Operating Engineer - Group V	
Painter	\$57.67
Plumber	\$83.99
Pipe Fitter	
Roofer/WaterProofer	\$62.13
Sheet Metal Worker	\$78.63
Sprinkler Fitter - Fire Protection	\$88.12
Truck Driver	\$44.93*
Truck Control Service Driver	
Truck Driver, Teamsters Group I	
Truck Driver, Teamsters Group II	
Truck Driver, Teamsters Group III	
Truck Driver, Teamsters Group IV	

* The Division of Labor Standards received fewer than 1,000 reportable hours for this occupational title. The public works contracting minimum wage is established for this occupational title using data provided by Missouri Economic Research and Information Center.

**The Prevailing Hourly Rate includes any applicable fringe benefit amounts for each occupational title as defined in RSMo Section 290.210.

ST. LOUIS COUNTY

OCCUPATIONAL TITLE	**Prevailing Hourly Rate
Carpenter	\$70.28
Millwright	
Pile Driver	
Electrician (Outside Lineman)	\$77.51
Outside - Groundman	
Outside - Groundman Tree Trimmer	
Outside - Lineman Operator	
Outside - Lineman Tree Trimmer	
Laborer	\$59.45
Laborer - General	
Laborer - Skilled	
Operating Engineer	\$76.52
Operating Engineer - Group I	
Operating Engineer - Group II	
Operating Engineer - Group III	
Operating Engineer - Group IV	
Truck Driver	\$40.45
Truck Control Service Driver	
Truck Driver, Teamsters Group I	
Truck Driver, Teamsters Group II	
Truck Driver, Teamsters Group III	
Truck Driver, Teamsters Group IV	

Use Heavy Construction Rates on Highway and Heavy construction in accordance with the classifications of construction work established in 8 CSR 30-3.040(3).

Use Building Construction Rates on Building construction in accordance with the classifications of construction work established in 8 CSR 30-3.040(2).

If a worker is performing work on a heavy construction project within an occupational title that is not listed on the Heavy Construction Rate Sheet, use the rate for that occupational title shown on the Building Construction Rate Sheet.

*The Division of Labor Standards received fewer than 1,000 reportable hours for this occupational title. Public works contracting minimum wage is established for this occupational title using data provided by Missouri Economic Research and Information Center.

**The Prevailing Hourly Rate includes any applicable fringe benefit amounts for each occupational title.

OVERTIME and HOLIDAYS

OVERTIME

For all work performed on a Sunday or a holiday, not less than twice (2x) the prevailing hourly rate of wages for work of a similar character in the locality in which the work is performed or the public works contracting minimum wage, whichever is applicable, shall be paid to all workers employed by or on behalf of any public body engaged in the construction of public works, exclusive of maintenance work.

For all overtime work performed, not less than one and one-half (1½) the prevailing hourly rate of wages for work of a similar character in the locality in which the work is performed or the public works contracting minimum wage, whichever is applicable, shall be paid to all workers employed by or on behalf of any public body engaged in the construction of public works, exclusive of maintenance work or contractual obligation. For purposes of this subdivision, "**overtime work**" shall include work that exceeds ten hours in one day and work in excess of forty hours in one calendar week; and

A thirty-minute lunch period on each calendar day shall be allowed for each worker on a public works project, provided that such time shall not be considered as time worked.

HOLIDAYS

January first;
The last Monday in May;
July fourth;
The first Monday in September;
November eleventh;
The fourth Thursday in November; and
December twenty-fifth;

If any holiday falls on a Sunday, the following Monday shall be considered a holiday.

APPENDIX H**SITE VISIT VERIFICATION FORM**

**Land Clearance for Redevelopment Authority PCB Remediation of the MET Center
6347 Plymouth Avenue, Wellston, Missouri 63133.**

MANDATORY PRE-BID MEETING AND SITE VISIT

Attendance at the mandatory pre-bid meeting and site visit is required as a condition of bid eligibility. Failure to attend will result in the Bid Proposal being deemed non-responsive.

Date of Pre-Bid Meeting and Site Visit: 2:30 PM CT on Wednesday, August 26, 2026

Location: MET Center, 6347 Plymouth Avenue, Wellston, Missouri 63133

Bidder: _____

Attendee Name: _____

Attendee Title: _____

I acknowledge the following:

1. I have attended the mandatory pre-bid meeting and site visit conducted by the Owner and the Owner's Environmental Consultant (Environmental Works, Inc.) at the MET Center.
2. I have inspected the building areas in which the PCB remediation work is to be performed, including the office tower, warehouse bays (High Bay, Low Bay, Diesel Shop), and the exterior perimeter of the North Tower, to the extent made accessible during the site visit.
3. I have observed the existing building conditions, including the character and extent of legacy coatings, the condition and configuration of existing HVAC systems, the location and condition of engineered barriers in warehouse areas, and the physical isolation and access controls at the North Tower, to the extent made accessible during the site visit.
4. I am aware that the building contains polychlorinated biphenyls (PCBs) in legacy paints and coatings, expansion joint sealants and caulks, dust reservoirs on horizontal surfaces and HVAC components, and porous substrates at localized areas, as documented in the PCB Sampling and Analysis Report (EWI, July 2025) referenced in the Cleanup Plan (Volume 3, Exhibit A).
5. I am aware that asbestos-containing materials (ACM) and lead-based paint (LBP) have been identified in certain areas of the building, as documented in the Hazardous Materials Survey (EWI, November 2025) referenced in the Contract Documents, and that multi-hazard coordination will be required where these materials are co-located with PCB-impacted materials.
6. I am aware that the MET Center is an active workforce training, family services and administrative facility, that portions of the building will remain occupied during remediation activities, and that the Contractor must plan and execute work to maintain safe operations and occupant protection.

7. I understand that I must prevent uncontrolled migration, cross-contamination, or recontamination attributable to my own Work and must protect verified areas, retained systems, and occupied portions of the facility from impacts caused by my operations.
8. My Bid Proposal is based on the conditions observed during the site visit, the information provided during the pre-bid meeting, the Contract Documents including Volumes 1 through 3 and all Exhibits and Addenda, and the EPA-Approved 40 CFR §761.61(c) Cleanup Plan.
9. I understand that this contract implements the EPA-approved Cleanup Plan and that performance of the Work remains subject to the Contract Documents, any EPA approval conditions incorporated into the Contract, and Notice to Proceed prerequisites established by the Owner.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

APPENDIX I

BID SUBMITTAL CHECKLIST

1.1 BID INFORMATION

- A. Bidder: _____
- B. Project Name: PCB Remediation of the MET Center
- C. Project Location: 6347 Plymouth Avenue, Wellston, MO 63133
- D. Owner: Land Clearance for Redevelopment Authority
- E. Owner's Environmental Consultant: Environmental Works, Inc.

1.2 BIDDER'S CHECKLIST

In an effort to assist the Bidder in properly completing all documentation required, the following checklist is provided for the Bidder's convenience. The Bidder is solely responsible for verifying compliance with bid submittal requirements and this list is not guaranteed to be all-inclusive of required information.

Attach this completed checklist to the **outside of the submittal envelope**.

- ☐ 1. Appendix A (Bidder Information Sheet and Statement of Qualifications) fully completed.
- ☐ 2. Appendix B (Bid Proposal, T&M NTE Format) fully completed and signed.
- ☐ 3. Exhibits X-1 through X-9 completed and included.
- ☐ 4. Appendix C (Bid Bond) or certified check for 5% of Base Bid Total NTE amount attached.
- ☐ 5. Appendix D (Affidavit of Compliance, Section 292.675 R.S.Mo.) completed and notarized.
- ☐ 6. Appendix E (Contractor Affidavit) completed and notarized.
- ☐ 7. Appendix F and Appendix F-1 (Federal Funding Requirements and Davis-Bacon Wage Determination) acknowledged. .
- ☐ 8. Appendix G and Appendix G-1 (Missouri Prevailing Wage Requirements and Missouri Annual Wage Order for St. Louis County) acknowledged.
- ☐ 9. Appendix H (Site Visit Verification Form) completed and signed.
- ☐ 10. Appendix I (this Checklist) completed and attached to outside of envelope.
- ☐ 11. All Addenda acknowledged on Appendix B (Bid Proposal).
- ☐ 12. Letter of Introduction (Attachment 3, Section B.3(a)) included.
- ☐ 13. Statement of Qualifications (Attachment 3, Section B.3(b)) included.
- ☐ 14. Personnel and Allocation of Resources (Attachment 3, Section B.3(c)) included, with resumes and TSCA/PCB training certifications for all key personnel.

- ☐ 15. Technical Approach, Health and Safety, and Phasing Narrative included (Attachment 3, Section B.3(d)).
- ☐ 16. Proposed Schedule included.
- ☐ 17. References (Attachment 3, Section B.3(e)), minimum three, including one public entity and one TSCA PCB project.
- ☐ 18. Litigation History (Attachment 3, Section B.3(f)) included.
- ☐ 19. Subcontracting Plan and DBE/MBE/WBE/Veteran Participation documentation (Attachment 3, Section B.3(h)) included.
- ☐ 20. Bid-time insurance evidence included as required by Section L and Part III, Exhibit A.
- ☐ 21. Three (3) hard copies (one original, two copies) prepared.
- ☐ 22. Sealed envelope marked with Bidder's Name, "**CONFIDENTIAL: Proposal for MET Center PCB Remediation Services**," and date of submission.

Bidder Signature: _____

Printed Name: _____ Date: _____

APPENDIX J**BID EVALUATION SUMMARY***FOR OWNER USE ONLY – NOT COMPLETED BY BIDDER*

The evaluation criteria, point allocations, scoring scale, and sub-criteria are provided in the separate evaluation workbook. The evaluation workbook contains the following sheets and functions:

- Summary – Score summary and ranking for all proposers.
- Scoring Matrix – Evaluation criteria (6 criteria, 100 total points), sub-criteria descriptions, and point allocations
- Evaluation Guidance – Reviewer guidance including responsiveness screen (pass/fail) and scoring instructions
- Cost Eval – Criterion 5.1 equalized cost calculation using Appendix K owner-defined evaluation quantities and owner-entered normalized pricing data.
- Proposer Scorecards – Individual scorecards for up to three proposers, with sub-criterion ratings by up to three reviewers, average scoring, and reviewer notes.

Evaluation Criteria Summary

#	Criterion	Points	Source
1	TSCA PCB Experience and Qualifications	20	B.3(b), B.3(c)
2	Technical Approach and Understanding of Cleanup Plan and Verification Logic	25	B.3(d)
3	Health and Safety and Exposure Control Program	15	B.3(d)
4	Project Management, Schedule, and Integration	15	B.3(c), B.3(d)
5	Cost Structure and Internal Consistency of T&M NTE Assumptions	20	Exhibits X-2 to X-9
6	Clarity of Subcontracting Plan and Tracking Approach	5	B.3(h)
Total		100	

This appendix is provided for transparency. The detailed sub-criteria, scoring scale, and proposer scorecards are contained in the evaluation workbook and are for internal Owner use during the evaluation process. Appendix K establishes the planning-level evaluation quantities and assumptions used for Criterion 5.1 equalized cost review.

Appendix K - Evaluation Quantities and Assumptions

K.1 Purpose, Basis, and Use Limitations

1. This Appendix provides evaluation quantities and assumptions to support bid normalization and comparison.
2. Evaluation quantities are not a field-verified takeoff. They are planning-level estimates derived from (a) the building-materials inventory surface-area/linear-foot estimates and (b) the Cleanup Plan's paint-by-location detection record and remedy framework.
3. N/A means Not Available in the cited source documents.
4. NOTE: These are evaluation quantities for bid comparison purposes only. Actual quantities will vary based on field conditions. The T&M NTE contract structure means the Contractor is paid for actual verified work performed, not the evaluation estimates.

Exhibit X-8 phase NTE totals remain bidder pricing and may be reviewed separately for Criterion 5.2 reasonableness. The Owner's equalized cost review, if used, shall rely on Appendix K planning quantities and Owner normalization rather than on bidder phase totals alone.

- Diesel-shop duct dust reservoir cleaning - 420 SF
- Office plaster wall paint - 650 SF
- High Bay brick wall paint - 4,500 SF
- High Bay concrete column paint - 3,640 SF
- Diesel Shop vertical I-beams - 2,200 SF
- Pillar/coated concrete paint areas - 9,500 SF
- Low Bay brick wall coating - 6,300 SF
- Low Bay metal cross beams/ceiling coating - 4,270 SF
- Low Bay drywall ceiling - 25,000 SF
- Low Bay concrete above drywall ceiling - 25,000 SF
- Exterior expansion joint sealant - 745 LF

The Low Bay drywall ceiling and Low Bay concrete above drywall ceiling quantities are included because they are major baseline work drivers affecting overhead access, containment, production rate, verification sequencing, and anticipated duration; their inclusion in Appendix K does not establish payment quantities or require any specific means and methods.

Normalized Evaluation Quantities

The quantities below are derived from the Building Materials and Sample Inventory surface-area and linear-foot estimates and from the Cleanup Plan's paint-by-location detection record and remedy framework.

This Appendix establishes the planning-level evaluation quantities and assumptions for Criterion 5.1 equalized cost review. These quantities are not field-verified takeoffs, do not modify the Work, do not

establish payment quantities, and are provided solely for Owner-side cost normalization and internal comparison of proposals.

Exhibit X – Cost and Technical Pricing Forms

Exhibit X includes the Cost and Technical Pricing Forms required for submission with the Bid Proposal. Bidders shall review Exhibit X-1 and complete Exhibits X-2 through X-9 in full.

Bidders shall enter all required rates, unit prices, quantities where requested, extended totals, assumptions, and not-to-exceed amounts directly into the forms. Blank pricing fields are not permitted. If a line item is not applicable to the Bidder's proposal, the Bidder shall enter "N/A" and provide a brief explanation where necessary to confirm that the omission is intentional and does not exclude required Work.

Pricing shall be complete, internally consistent, and sufficient to evaluate the Bidder's proposed cost structure for the Work. The Bidder's pricing shall include all labor, supervision, equipment, materials, consumables, waste management, verification support, subcontractor costs, insurance, bonds, overhead, profit, and other costs necessary to perform the Work in accordance with the Contract Documents, the EPA-approved 40 CFR 761.61(c) Cleanup Plan, and the applicable approval conditions.

Exhibits X-2 through X-8 establish the Bidder's pricing for baseline Work and phase/task not-to-exceed (NTE) pricing. Exhibit X-9 establishes contingency and Owner-directed unit prices only. Work priced under Exhibit X-9 shall not be performed unless authorized in advance by the Owner in writing.

The following Cost and Technical Pricing Forms are included in the following pages:

- Exhibit X-1 – Pricing Instructions and Definitions
- Exhibit X-2 – Labor Rate Schedule
- Exhibit X-3 – Equipment Rate Schedule
- Exhibit X-4 – Materials and Consumables Schedule
- Exhibit X-5 – Mobilization, Demobilization, and Per Diem
- Exhibit X-6 – Waste Management and Disposal Unit Prices
- Exhibit X-7 – Verification Sampling and Laboratory Allowances
- Exhibit X-8 – NTE Summary by Phase/Task
- Exhibit X-9 – Contingency / Owner-Directed Unit Price Schedule

Exhibit X-1: Pricing Instructions and Definitions

Exhibit X-1: Pricing Instructions and Definitions			
<i>Bidders shall complete Exhibits X-2 through X-9 in accordance with these definitions and instructions. Bidders shall not modify fixed labels, formulas, or instructions in the workbook. Exhibit X-1 is provided for definitions and instructions and is not a bidder-completed pricing form.</i>			
Bid Sheet Item / Term	Applies To	Definition / Instruction	Bidder Entry / Use
Base Bid Total NTE Amount	X-8	The total proposed not-to-exceed amount for the defined base remediation work, calculated from phase-level NTE amounts and supporting bid exhibits. The Base Bid Total NTE provides a comparable baseline for bid evaluation.	Enter phase totals and supporting assumptions in X-8 and related exhibits. Do not include Owner-directed contingency unit prices unless expressly requested.
Phase-Level NTE	X-8	A not-to-exceed cost cap for a defined project phase or work category. No cost may exceed an approved phase NTE without prior written Owner authorization.	Enter a separate NTE for each phase or work category identified in X-8.
Time-and-Materials Billing	X-2 through X-8	Compensation based on documented labor hours, equipment use, materials, subcontracted services, waste costs, and other approved reimbursable items, subject to applicable phase-level NTE amounts.	Use the rates and unit prices submitted in the bid forms. Provide documentation sufficient to support payment.
Fixed Contract Billing Rates	X-2 and X-3	Labor and equipment rates entered on Exhibits X-2 and X-3 shall be the rates the Bidder proposes to use for this Contract. If the Bidder maintains published, standard, or schedule-based rates for comparable work, the Bidder shall identify whether the proposed rates match those rates. Any deviation from the Bidder's standard rate structure shall be explained in the Notes column. The rates entered in Exhibits X-2 and X-3 shall become the Contract billing rates unless modified by written amendment or change order.	Enter proposed contract billing rates by labor category and equipment category. Identify deviations from standard or published rates in Notes.
Fully Burdened Labor Rate	X-2	Labor rates entered on Exhibit X-2 shall be fully burdened contract billing rates. Fully burdened labor rates shall include applicable wages, fringe benefits, payroll burden, payroll taxes, workers' compensation, insurance, overhead, profit, small tools, ordinary task-support supplies, standard personal protective equipment, and routine supervision customarily included in the labor classification, except where a specific cost is separately identified in another exhibit and expressly allowed by the Contract Documents. Additional charges for burden, fringe, payroll adders, labor markups, or ordinary labor-related costs will not be allowed unless expressly authorized by the Contract Documents.	Enter straight-time, overtime, and holiday/premium rates as fully burdened billing rates. Do not enter separate burden, fringe, payroll adders, or labor markups unless expressly authorized elsewhere in the Contract Documents.
Burden / Fringe Included Required	X-2	Burden and fringe must be included in each listed labor rate. A response other than confirmation that burden/fringe is included shall be treated as an exception requiring Owner review and may be considered nonresponsive if inconsistent with the Contract Documents.	Enter "Y" to confirm burden/fringe is included. Use Notes only to clarify rate assumptions, not to reserve separate burden, fringe, or labor-markup charges.
Equipment Rate	X-3	Equipment rates entered on Exhibit X-3 shall identify whether equipment is owned, rented, or subcontracted. Rates shall identify the applicable unit, standby rate, minimum charge, mobilization or delivery charge, and any operator or fuel assumptions. Equipment charges must be supported by daily equipment logs and, where rented or subcontracted, invoices or other documentation required by the Owner.	List major equipment, ownership status, rate unit, unit rate, standby rate, minimum charge, operator/fuel assumptions, and documentation assumptions in Notes.
Owned / Rented / Subcontract	X-3	Indicates whether equipment is owned by the Bidder, rented from a third party, or provided by a subcontractor.	Select or enter the applicable status for each major equipment item.
Standby Rate	X-3	Rate charged when equipment is available for the Project but not actively operating. Standby charges are allowed only if authorized by the Contract Documents and supported by field records.	Enter standby rate, if any, and describe limitations in Notes.
Materials and Consumables Allowance	X-4	A not-to-exceed allowance bucket for materials and consumables used to support remediation, containment, decontamination, PPE, protection, sampling support, and similar work.	Enter allowance amount and identify whether receipts or invoices are required for billing support.
Billing Support Required	X-4, X-6, X-7	Identifies whether invoices, receipts, laboratory reports, manifests, bills of lading, certificates of disposal, or similar backup must be submitted to support payment.	Enter Y or N where requested and provide supporting documentation as required by the Contract.
Mobilization Block	X-5	A pricing-normalization unit for planned mobilization and demobilization of personnel, equipment, temporary facilities, and project support resources.	Enter cost assumptions for mobilization, demobilization, per diem, travel, lodging, and similar support costs.

Exhibit X-1: Pricing Instructions and Definitions			
10-Day-On / 4-Day-Off Assumption	X-5	The 10-day-on / 4-day-off reference in Exhibit X-5 is a pricing-normalization assumption only. It is not a mandatory work schedule and does not limit the Owner’s right to direct phasing, access, or sequencing. Bidders shall use this assumption only to make mobilization, per diem, and field-oversight assumptions comparable across proposals, unless the Bidder proposes and explains a different approach.	Use the assumption for pricing comparability only. Identify and explain any different proposed rotation, mobilization, per diem, or field-support assumption in Notes.
Waste Unit Price	X-6	Waste unit prices entered on Exhibit X-6 shall identify what is included in each unit price, including packaging, containers, liners, labeling, profiling, facility approval, loading, transportation, disposal, manifesting, bills of lading, certificates of disposal or destruction, minimum loads, demurrage, fuel surcharges, taxes or fees, and any excluded costs. Each waste unit price shall identify the assumed receiving facility type and, where known, the assumed receiving facility.	Enter unit prices by waste stream and identify included services, assumed receiving facility type, receiving facility if known, minimum loads, demurrage, surcharges, taxes or fees, and exclusions.
PCB Remediation Waste	X-6	Waste managed under the TSCA remediation waste framework when building materials, dust, or debris are impacted by PCB releases, migration, or residues and are disturbed during the Work.	Price management, transport, and disposal consistent with the Cleanup Plan, RFP, and applicable TSCA requirements.
PCB Bulk Product Waste	X-6	Waste consisting of manufactured PCB-containing products and certain attached substrates where applicable, including caulk, mastics, sealants, or legacy coatings removed in discrete pieces consistent with the RFP and Cleanup Plan waste-routing logic.	Identify assumed disposal route and documentation. Do not assume substrate separation solely to change waste classification.
Receiving Facility Type	X-6	The disposal or destruction facility category assumed for each waste stream, such as TSCA chemical waste landfill, TSCA incinerator, RCRA Subtitle C facility, or eligible Subtitle D facility for qualifying PCB bulk product waste.	Enter assumed facility type and receiving facility, if known. Identify facility acceptance and profiling assumptions.
Verification Sampling Unit Price	X-7	Unit price for verification or documentation sampling, including field labor support, sample handling, laboratory analysis, data review support, and reporting support where applicable.	Enter unit prices for wipe, bulk, air, HVAC, or other verification sample types as requested.
Laboratory Turnaround Time	X-7	Assumed laboratory reporting schedule for samples submitted under the Work. Expedited turnaround should be priced separately where applicable.	Identify standard and expedited turnaround assumptions and related costs.
Contingency Unit Price	X-9	Unit prices entered on Exhibit X-9 apply only to Owner-authorized contingency or Owner-directed work. Unit-priced work is not included in the Base Bid Total NTE unless expressly identified in Exhibit X-8. No work reasonably inferable as required to complete the baseline Work may be billed under Exhibit X-9 without prior written authorization from the Owner.	Enter unit prices for potential contingency or Owner-directed activities. Do not include baseline Work in X-9 unless expressly directed. Do not perform or bill X-9 work without prior written Owner authorization.
Owner Authorization	X-8 and X-9	Written approval required before incurring costs that exceed a phase NTE, performing Owner-directed contingency work, or changing approved scope assumptions.	Identify assumptions that require Owner authorization before implementation.
Documentation and Traceability	All Exhibits	Records must allow labor, equipment, materials, waste, verification, and closeout costs to be traced to work areas, phases, waste streams, or submittal packages where applicable.	Maintain daily logs, invoices, manifests, sample records, certificates, and other backup required by the Contract.
Performance-Based Scope	All Exhibits	The bid forms support a performance-based cleanup procurement. The Contractor remains responsible for selecting compliant means and methods to meet the EPA-approved 40 CFR 761.61(c) Cleanup Plan requirements.	Price the Work to achieve required outcomes without relying on Owner-directed means and methods.
Total PCBs	X-6 and X-7	Decision metric used for project PCB comparisons, calculated as the sum of detected Aroclors for the relevant sample or medium.	Use Total PCBs in waste, verification, and reporting assumptions where PCB analytical results are used.

Exhibit X-2: Labor Rate Schedule

Enter proposed hourly rates.

Labor Category	Straight Time Hourly Rate (\$/hr)	Overtime Hourly Rate (\$/hr)	Holiday/Premium Rate (\$/hr)	Confirmation that Burden/Fringe is Included ⁽¹⁾ ('Yes' Required)	Notes (Minimum Hours, Travel Time Policy, etc.)
Project Manager					
Site Superintendent					
Foreman					
Health and Safety Officer / IH Lead					
Competent Person (If Separate)					
Equipment Operator					
Skilled Laborer					
General Laborer					
Sampling Technician (Wipes/Bulk/Air Support)					
Data/QC Coordinator (Turnover Packages/Closeout)					
Other (Specify)					

Notes:

(1) Burden/fringe must be included in each listed labor rate. Proposed labor rates shall be fully burdened and shall include wages, payroll taxes, fringe benefits, workers’ compensation, insurance, overhead, profit, small tools, ordinary task-support supplies, standard PPE, routine supervision customarily included in the labor classification, and all other labor-related costs except where a specific cost is separately identified in another exhibit and expressly allowed by the Contract Documents. Additional charges for burden, fringe, payroll adders, labor markups, or ordinary labor-related costs will not be allowed unless expressly authorized by the Contract Documents.

Exhibit X-3: Equipment Rate Schedule (Major Items)

List major equipment with unit rates. Use 'Owned/Rented/Subcontract' and identify standby/minimum charges if applicable.

Equipment Description	Ownership (Owned/Rented/Subcontract)	Rate Unit (Hr/Day/Week/Each)	Unit Rate (\$)	Standby Rate (\$) (If Any)	Minimum Charge (If Any)	Notes
Access Equipment (Lifts/Scaffolds/Platforms)						
Negative Air Units / HEPA Filtration Units						
HEPA Vacuums (Industrial)						
Surface Prep / Grinding Equipment						
Generators / Power Distribution						
Compressors / Air Supply						
Decon Trailer / Wash Station						
Air Monitoring / Sampling Support Equipment (If Provided)						
Other (Specify)						

Exhibit X-4: Materials and Consumables Schedule

Use allowance buckets for comparability. Enter allowance amount (NTE) and clarify billing support required.

Bucket Name	Included Items (High Level)	Allowance Amount (NTE) (\$)	Billing Support Required (Receipts/Invoices) (Y/N)	Notes
Containment and Protection Materials	Poly sheeting, barriers, floor protection, tape, signage, access control materials			
PPE and Hygiene Supplies	Disposable PPE, gloves, respirator consumables, hygiene supplies			
Decontamination Supplies	Detergents, wipes, decon pads, rinse water supplies			
Sampling Supplies (Non-Lab)	Templates, wipes, containers, labels, COC forms			
Packaging Materials	Drums/liners, boxes, pallets, labels, absorbents			
Other (Specify)				

Exhibit X-5: Mobilization, Demobilization, and Per Diem

Owner pricing-normalization assumption only: if the proposer uses rotational blocks for pricing buildup, assume approximately 10 days on / 4 days off.
Actual schedule is Owner-directed and this assumption is not a Cleanup Plan requirement.

Item	Unit (Each / Person-Day / Vehicle-Day / Mile)	Unit Rate (\$)	Quantity Assumption	Extended Amount (\$)	Notes
Mobilization (Per Mobilization Block)					
Demobilization (Per Mobilization Block)					
Per Diem - Lodging (Person-Day)					
Per Diem - Meals and Incidentals (Person-Day)					
Vehicle/Truck (Vehicle-Day)					
Mileage (Per Mile)					
Freight/Delivery (Allowance or Unit)					
Other (Specify)					
Total					

Exhibit X-6: Waste Management and Disposal Unit Prices

Enter unit prices by waste stream and facility route. Identify what is included (packaging/profiling/transport/manifests/disposal/COD).

Waste Stream ID	Waste Category	Container Type	Unit (ton/drum/box/each)	Includes Packaging (Y/N)	Includes Profiling (Y/N)	Includes Transport (Y/N)	Includes Disposal Fee (Y/N)	Includes Manifests/COD (Y/N)	Unit Price (\$)	Notes (Facility Assumptions, Minimum Loads, Demurrage)
WS-1	PCB Remediation Waste	Roll-Off	ton							
WS-2	PCB Remediation Waste	Drum	drum							
WS-3	PCB Remediation Waste	Box	box							
WS-4	PCB Bulk Product Waste (Eligible)	Roll-Off	ton							
WS-5	PCB Bulk Product Waste (Eligible)	Box	box							
WS-6	PCB Articles (Ballasts)	Each	each							
WS-7	PCB Liquids / Decon Fluids (If Applicable)	Drum	drum							
WS-8	Other (Specify)									

Exhibit X-7: Verification Sampling and Laboratory Allowances

Enter unit rates and allowances for verification support. Lab costs may be shown as allowance amounts for comparability.

Item	Unit	Unit Rate (\$)	Quantity	Extended Amount (\$)	Notes (Target RL, TAT Assumptions, Included Services)
Wipe Sampling Event Support (Labor)	event				
Bulk Sample Collection Support (Labor)	sample				
Indoor Air Sampling Support (Labor)	sample				
Laboratory Analytical Allowance (Wipes/Bulk/Air)	allowance				
Data Validation / QA Review Allowance	allowance				
Other (Specify)					
Total					

Exhibit X-8: NTE Summary by Phase/Task

Enter NTE amounts by category. Phase Total auto-calculates. Actual sequencing/schedule is Owner-directed; rotation assumptions are for pricing normalization only. Base phase NTE pricing shall reflect the Bidder's assumed effort for baseline Low Bay ceiling-related work, including PCB-impacted drywall ceiling areas and concrete above drywall ceiling areas, to the extent such work is included in the Bidder's implementation of the baseline Cleanup Plan scope.

Pricing Assumptions (For Comparability Only)

Owner pricing-normalization assumption only: if used for pricing buildup, assume approximately 10 days on / 4 days off. Actual schedule is Owner-directed and this assumption is not a Cleanup Plan requirement.

Phase/Task	Labor NTE (\$)	Equipment NTE (\$)	Materials/Consumables NTE (\$)	Mobilization/Per Diem NTE (\$)	Waste Mgmt Handling Only NTE (\$)	Phase Total NTE (\$)	Basis of NTE (Crew, Hours, Mobilization Blocks, Key Assumptions)
For any phase that carries Low Bay ceiling-related baseline work, identify the principal quantity, access, production, and containment assumptions used to develop that phase NTE.							
Phase 1: Pre-Mobilization / Submittal Development							
Phase 2: Coatings/Paint Remediation (Source Removal/Treatment)							
Phase 3: Porous Concrete Work (Localized Removal/Treatment)							
Phase 4: HVAC and Dust Reservoir Controls (Cleaning/Protection/Integration)							
Phase 5: Verification Sampling and Data Evaluation (Turnover Support)							
Phase 6: Waste Management, Staging, and Decontamination (Handling)							
Phase 7: IC/O&M Interface Support (As-Built, Managed Areas, O&M Startup)							
Phase 8: Closeout / Completion Report / Stewardship Record Package							

Base Bid Total NTE		

Note: Criterion 5.1 equalized cost review, if used by Owner, is based on Appendix K planning quantities and Owner normalization, not solely on Exhibit X-8 phase totals.

Exhibit X-9: Unit Price Schedule (Contingency and Owner-Directed Allowances)

Enter unit prices for Owner-authorized contingency items and re-verification triggers. Authorization is required prior to performance. Baseline Low Bay ceiling work, including drywall ceiling work and concrete-above-drywall-ceiling work reasonably inferable as part of the Bidder's implementation of the baseline Cleanup Plan scope, shall not be priced solely as an Exhibit X-9 contingency item.

Unit Price Item	Unit	Unit Rate (\$)	Notes (Trigger / Authorization Basis)
Additional VU Verification Wipes	wipe		
Additional VU Verification Wipe Event	event		
Step-Out Sampling / Re-Verification Event	event		
Localized Cap Repair Support	LS		
Additional Mobilization Block	each		
Extended Work Hours Premium (If Allowed)	hour		
Transport and Disposal of Unforeseen PCB Remediation Waste (≥50 mg/kg Total PCBs)	ton		Owner-authorized; routed to TSCA-approved or RCRA Subtitle C facility
Other (Specify)			

PART II – CONTRACT FORM

Owner will provide the Contract Documents as part of a written addendum issued on or after Wednesday, August 26, 2026.

PART III – CONDITIONS OF THE CONTRACT

Part III contains the Conditions of the Contract and related contract exhibits. These requirements apply to the Work and are incorporated into the Agreement executed under Part II. In the event of a conflict among Contract Documents, the order of precedence stated in Attachment 3, Section M governs.

Exhibit A – Insurance and Bonds

This Exhibit contains the full insurance requirements for the Contract, including required coverages, limits, additional insureds, notice provisions, and required endorsements. It also identifies required bond instruments and bond requirements, where applicable.

1. Insurance

The Contractor shall procure and maintain the required insurance coverages detailed below in this Exhibit A for the duration of the Contract and any required extended reporting or completed operations periods, as specified in this Exhibit. **Contractor's Pollution Liability (CPL) coverage applicable to PCB remediation operations is required.**

2. Bonds

The Contractor shall provide the required bond instruments in the amounts and form specified in the Contract Documents, which shall specifically include both performance and payment bonds.

3. Priority

In the event of conflict between Attachment 3, Section L (Insurance Requirements Summary) and this Exhibit, this Exhibit controls.

Required Insurance Coverages

The Contractor shall purchase from and maintain in a company or companies lawfully authorized to do business in the State of Missouri and acceptable to the Owner such insurance as will protect the Contractor from the following kinds of claims, which may arise out of or result from the Contractor's operations under the Contract and for which the Contractor may be legally liable, whether such operations be by the Contractor or by a Subcontractor or by anyone directly or indirectly employed by any of them, or by anyone for whose acts any of them may be liable: (1) claims under workers' or workman's compensation, disability benefit and other similar employee benefit acts which are applicable to the Work to be performed; (2) claims for damages because of bodily injury, occupational sickness or disease or death of the Contractor's employees; (3) claims for damages because of bodily injury, sickness or disease, or death or any person other than the Contractor's employees; (4) claims for damages insured by usual personal injury liability coverage; (5) claims for damages, other than to the Work itself, because of injury to or destruction of tangible property, including loss of use resulting therefrom; (6) claims for damages because of bodily injury, death of a person or property damage arising out of ownership, maintenance or use of a motor vehicle; (7) claims for bodily injury or property damages arising out of completed operations; and (8) claims involving contractual liability insurance applicable to the Contractor's obligations herein.

Contractor shall purchase and maintain, at Contractor's sole cost and expense, the insurance indicated below issued by insurance companies licensed to do business in the State(s) where the Work is to be performed and having a minimum A.M. Best's rating of A-VI:

FORM OF COVERAGE	MINIMUM POLICY LIMITS
1. Statutory Worker's Compensation and Employer's Liability	Worker's Compensation – as required by Statute. Employer's Liability – (a) \$1 Million Bodily Injury by Accident, per accident; (b) \$1 Million Bodily Injury by Disease, each employee; and (c) \$1 Million Bodily Injury by Disease, policy limit

FORM OF COVERAGE	MINIMUM POLICY LIMITS
2. Commercial General Liability, on a primary and non-contributory basis, including contractual liability and contractor's protective liability (covering all damage to persons or property arising from the Work)	\$1,000,000.00 per occurrence combined single limit for bodily injury, including personal injury and property damage, to apply on a per project basis; \$2,000,000 general aggregate per agreement per agreement, covering bodily injury, personal injury, property damage, loss of use of property, premises/operations, independent contractors, products/completed operations (ten-year term after Project Final Completion or the statute of limitations, whichever is less), and Blanket Contractual Liability, including protection for the Contractor from claims arising out of liability and indemnity obligations in connection with the Contract.
3. Automotive liability, including non-owned and hired car liability	Not less than \$1,000,000.00 per accident combined single limit for bodily injury and property damage
4. Excess or Umbrella Liability (exclusive of defense costs if applicable) in excess of all liability insurance policies referenced above, including but not limited to Commercial General Liability Products and Completed Operations, Automobile liability	Not less than \$5 Million per occurrence and aggregate and all limits to apply on a per project basis
5. Property insurance on an "all risk" or "special risk" form covering all property such as tools, equipment and machinery used by Contractor or applicable subcontractor in the performance of the Work (whether owned or leased) and containing a waiver of subrogation in favor of Owner and Owner's consultants	Limits not less than "Replacement Cost Value"
6. Pollution	Minimum Policy Limits: • Five Million Dollars (\$5,000,000.00) per Claim or Occurrence • Ten Million Dollars (\$10,000,000.00) per Aggregate
7. Professional Liability/Errors and Omissions	Insurance covering liabilities for financial loss resulting or arising from acts, errors or omissions and negligence in rendering services provided under this agreement with a minimum limit of \$5,000,000 per claim and annual aggregate (per project)

All insurance, including insurance provided under the commercial umbrella, shall be written on an occurrence basis, except and only if occurrence-based coverage is not reasonably available, in which event claims-made coverage shall be provided for a claim period acceptable to Owner and shall apply

as primary insurance with respect to any other insurance or self-insurance programs afforded to or maintained by the Owner. Coverages shall be maintained without interruption from date of commencement of the Work until date of final payment and thereafter for any coverage required to be maintained after final payment. The St. Louis Economic Development Partnership shall be added as an additional insured on all policies except Workers' Compensation policies. The Additional Insureds clause shall be ISO Additional Insured Endorsement CG 20 10 11 85 or a substitute providing equivalent coverage under the general liability and umbrella programs. The coverage on all such policies required from Contractor pursuant to this Contract shall be primary to any valid and collectible insurance carried by Owner. Nothing in this Section shall modify or limit contractor's liability as otherwise provided herein.

The Contactor shall maintain in force for the full period of the Contract, pollution liability insurance coverage in the minimum amount set forth herein for the losses caused by sudden and non-sudden pollution conditions that arise from the operations of the Contractor. There shall be no exclusions which would limit coverage for PCB-related work or for transportation and/or disposal of contaminated material. Such insurance shall apply to bodily injury and property damage, including loss of use of the damaged property or property that has not been physically injured, and shall cover cleanup, transportation, disposal, remediation and defense cost, including all expenses incurred in the investigation, defense, payment or settlement of claims. If claims made, the insurance coverage shall be retroactive to the earlier of the date of this Contract or the commencement of the Contractor's work on the Project, and Contractor shall cause the same to remain in effect for a period of at least five (5) years after final acceptance of the Project by the Owner or such other period as may be set forth in the Contract Documents.

Certificates of insurance acceptable to the Owner shall be filed with the Owner prior to commencement of the Work (or before any Subcontractor commences its portion of the work in the case of Subcontractor certificates). Upon request following any claim against the Owner appearing to be within the required coverages, the Contractor shall furnish true and complete copies of all insurance policies. These policies and certificates shall contain a provision that coverages afforded under the policies will not be canceled, amended, allowed to expire until at least 30 days' prior written notice has been given to the Owner and shall set forth evidence of all coverage required herein. Certificates of Insurance shall contain transcripts from the proper office of the insurer, evidencing in particular those insured and specifically setting forth evidence of all coverage required herein, the location and operations in which the insurance applies, the expiration date and notice of cancellation clause. Contractor shall request of all its insurers that they give 60 days written notice before cancellation or expiration. If any of the foregoing insurance coverages are required to remain in force after final payment and are reasonably available, an additional certificate evidencing continuation of such coverage on account of revised limits or claims paid under the General Aggregate, or both, shall be furnished by the Contractor with reasonable promptness in accordance with the Contractor's information and belief. The Contractor shall furnish to the Owner copies of any endorsements that are subsequently issued amending limits of coverage.

Insurance similar to that required of the Contractor (other than excess liability coverage, which shall not be required) shall be provided by or on behalf of all Subcontractors performing work at the Project, to cover their operations performed under the Contract Documents. The Contractor shall be held responsible for any modification of these insurance requirements as they apply to Subcontractor. The Contractor shall maintain Certificates of Insurance from all Subcontractors, enumerating among other things, the waivers in favor of and insured status of the Indemnitees, as required herein and make them available to the Owner upon request. Any variation in the Subcontractors' insurance coverage shall be approved by the Owner in advance, coincident with the Owner's approval of the Subcontractor. For purposes of this Section, the term "Subcontractor(s)" shall include Subcontractors of any tier.

Any insurance policy covering the Contractor's or its Subcontractors' equipment against loss by physical damage shall include an endorsement waiving the insurer's right of subrogation against the Indemnitees. Such insurance shall be the Contractor's and Subcontractors' sole and complete means of recovery for any such loss. Should the Contractor or its Subcontractors choose to self-insure this risk, it is expressly agreed that the Contractor and Subcontractors hereby waive any claim for damage or loss to said equipment in favor of the Indemnitees.

The Contractor shall purchase and maintain property insurance covering all property owned by, or in control of, the Contractor which is not to be incorporated into the Work, including without limitation, tools, equipment and materials. The Contractor shall also require the Subcontractors to provide "all risk" insurance to protect the Contractor for materials in transit or in storage off the Project Site, until either incorporated in the Work or stored on the Project Site, at the full replacement cost value. The Contractor and Subcontractors waive all rights against the Owner and each other for damages caused by fire or other perils or for loss of use to property insured pursuant to this paragraph.

Exhibit B – Governing Technical Documents Incorporated by Reference

The EPA-approved 40 CFR §761.61(c) Risk-Based Cleanup and Disposal Application for the MET Center (Cleanup Plan), including the EPA approval letter and any EPA approval conditions, is the governing technical document for this remediation contract.

1. Incorporation by Reference: The Cleanup Plan is provided in Volume 3, Exhibit A of this RFP and is incorporated by reference into this Contract.
2. Implementation: The Contractor shall implement the Cleanup Plan as written. This Contract does not modify the Cleanup Plan, its decision logic, or its endpoints.
3. Changes: Any material change to the Cleanup Plan implementation approach that could affect protectiveness, acceptance determinations, waste classification or routing, or institutional control boundaries shall follow the change management requirements in Volume 2 and, where applicable, be coordinated through the Owner or Owner's Environmental Consultant for EPA coordination.

The EWI Hazardous Building Materials Report (November 2025) is incorporated by reference as the contract's companion technical reference for suspect and confirmed ACM and LBP locations and for multi-hazard planning where ACM or LBP may be encountered in connection with the Work.

1. Incorporation by Reference: The Hazardous Building Materials Report is provided in Volume 3, Exhibit A of this RFP and is incorporated by reference into this Contract.
2. Implementation: Where suspect or confirmed ACM or LBP is implicated in the Work area, the Contractor shall use the Hazardous Building Materials Report for material identification, reported locations, and multi-hazard work planning inputs, including exposure controls, PPE, waste segregation, and coordination of PCB work practices with applicable asbestos and lead requirements.
3. Hierarchy: The Hazardous Building Materials Report does not modify the Cleanup Plan, the contract hierarchy, or the performance-based means-and-methods framework of this RFP. In the event of conflict regarding PCB remediation requirements, the Cleanup Plan and any EPA approval conditions control.

Exhibit C – Supplementary Administrative Conditions for Performance-Based Remediation

This Exhibit contains Supplementary Conditions that modify and supplement the Agreement and other Contract Documents for this remediation contract. The Supplementary Conditions include TSCA/PCB-specific administrative, documentation, and compliance provisions consistent with the performance-based nature of this procurement.

1. Purpose

The Supplementary Conditions establish contract administration requirements and enforceable documentation deliverables, including turnover documentation package expectations, recordkeeping requirements, and closeout documentation inputs.

2. Scope Firewall

The Contractor's responsibilities are limited to the Work under this remediation Contract and preventing uncontrolled migration or recontamination attributable to the Contractor's Work. The Contractor does not direct or manage the schedules or means and methods of other parties performing work at the Site.

C-1 Governing Technical Documents and Incorporation

C-1.1 Governing Technical Requirements

The Contractor shall perform the Work in accordance with the Contract Documents. All technical performance requirements, acceptance criteria, verification rules, waste designation and disposal routing requirements, and documentation gates are established in **Volume 2** and the **Cleanup Plan** (Volume 3, Exhibit A). The Contractor shall implement those requirements as written.

C-1.2 No Modification of the Cleanup Plan

This Contract implements the Cleanup Plan. The Contractor shall not modify, substitute, or deviate from the Cleanup Plan requirements or Volume 2 requirements except through the change management process described in Section C-8 of this Exhibit and as otherwise authorized in writing by the Owner.

C-1.3 Conflicts

If the Contractor identifies any apparent conflict, ambiguity, or discrepancy among the Contract Documents affecting the Work, the Contractor shall promptly notify the Owner in writing and shall not proceed with the affected Work until the Owner provides written direction. The order of precedence in Attachment 3, Section M governs.

C-2 Performance-Based Means and Methods

C-2.1 Contractor Means and Methods

This procurement is performance-based. The Contractor is solely responsible for selecting and implementing means and methods necessary to meet the requirements of Volume 2 and the Cleanup Plan and to comply with applicable law.

C-2.2 No Direction of Means and Methods by Owner

The Owner and Owner's Environmental Consultant do not direct the Contractor's means and methods. Any review of submittals or field documentation by the Owner or Owner's Environmental

Consultant is for confirmation of contractual compliance and documentation completeness and does not transfer responsibility for means and methods to the Owner.

C-2.3 Compliance Responsibility

The Contractor remains responsible for compliance with all applicable requirements governing the Work, including those referenced in the Contract Documents. No statement or omission in this Contract is intended to reduce or transfer that responsibility.

C-3 Submittals and Acceptance Process

C-3.1 Required Submittals

The Contractor shall provide the submittals required by Volume 2 and any additional submittals required by the Contract Documents. Submittals include, at minimum, pre-mobilization submittals and implementation-phase documentation submittals (as applicable to the Contractor's Work).

C-3.2 Submittal Review Categories

Submittals will be reviewed and returned under one of the following dispositions:

1. Accepted
2. Accepted as Noted
3. Revise and Resubmit
4. Rejected

C-3.3 Effect of Submittal Review

A review disposition does not relieve the Contractor of responsibility for compliance, accuracy, completeness, or performance of the Work. The Contractor shall correct any identified deficiencies and shall provide revised submittals where required.

C-3.4 Proceeding at Risk

The Contractor shall not proceed with Work dependent on a required submittal until the required submittal has been Accepted or Accepted as Noted, unless the Owner provides written authorization to proceed.

C-4 Turnover and Acceptance Milestones

C-4.1 Turnover as a Contract Milestone

"Turnover" is an environmental status milestone supported by verification and documentation as defined in Volume 2 and the Cleanup Plan. Turnover is distinct from general construction completion and is not implied by substantial completion of physical tasks.

C-4.2 Turnover Documentation Package

For each area where Turnover is proposed, the Contractor shall assemble and submit the Turnover Documentation Package required by Volume 2. The Contractor shall not represent an area as suitable for routine use or occupancy until Turnover has been documented in writing by the Owner or Owner's Environmental Consultant.

C-4.3 Final Acceptance and Closeout

Final acceptance of the Work is contingent upon submission of complete closeout deliverables required by Volume 2 and the Contract Documents, including required waste documentation, as-built documentation generated by the Contractor's Work, and completion documentation inputs.

Administrative closeout is a condition precedent to final payment to the extent specified in the Contract Documents.

C-5 Regulatory Communications and Notices

C-5.1 Communication Protocol

Unless expressly stated otherwise in the Contract Documents, formal regulatory communications and notices shall be transmitted by the Owner or the Owner's Environmental Consultant. The Contractor shall not represent the Owner in communications with regulatory agencies.

C-5.2 Contractor Support

The Contractor shall provide draft notices, supporting documentation, and technical information generated by the Contractor's Work as needed to support Owner or Owner's Environmental Consultant communications, approvals, or submissions required under the Contract Documents.

C-5.3 No Independent Commitments

The Contractor shall not make commitments or representations to a regulator on behalf of the Owner. If a regulator requests information directly from the Contractor, the Contractor shall promptly notify the Owner and the Owner's Environmental Consultant and provide requested information only as directed by the Owner.

C-6 Records, Data, and Deliverable Format

C-6.1 Recordkeeping Standard

The Contractor shall maintain complete and accurate records of the Work sufficient to support Volume 2 requirements, turnover decisions, waste documentation, and closeout documentation. Records shall meet the written records requirements of 40 CFR §761.180(a) as applicable to the Work. The Contractor shall retain all project records for a minimum of three (3) years after Contract closeout per 40 CFR §761.180(b), or such longer period as may be required by EPA or by the terms of the EPA approval conditions. Upon Contract closeout, the Contractor shall transfer a complete set of records to the Owner in the format specified in Section C-6.3.

C-6.2 Required Record Types

Records include, as applicable: daily reports; field logs; chain-of-custody documentation; laboratory reports; calibration and equipment logs; photo logs; waste container inventories; shipment documentation; decontamination records; corrective action records; and as-built markups generated by the Contractor's Work.

C-6.3 Deliverable Organization

Unless otherwise directed, the Contractor shall submit deliverables in a location-indexed and Verification Unit-indexed organization sufficient to support traceability and closeout compilation. Digital deliverables shall be submitted in searchable PDF format where practicable, with native files provided where required (for example, spreadsheets and marked-up drawings).

C-7 Waste Shipment Documentation and Reconciliation

C-7.1 Shipment Packages

For each waste shipment generated by the Contractor's Work, the Contractor shall provide a shipment package containing the shipping documentation required by Volume 2 and the receiving facility documentation provided to the Contractor.

C-7.2 Reconciliation

The Contractor shall maintain container inventories and reconcile shipment documentation to container inventories and source area records. Discrepancies shall be identified and resolved promptly and documented in the project record.

C-7.3 Segregation and Traceability

The Contractor shall maintain segregation and traceability of waste streams consistent with Volume 2 and shall not commingle or dilute wastes.

C-8 Change Management

C-8.1 Field Change Identification

The Contractor shall promptly identify unexpected conditions or field circumstances that could affect performance, verification, waste designation, disposal routing, or documentation requirements, and shall document the condition in writing.

C-8.2 Authorization

The Contractor shall not implement material changes to the Work that could affect the governing technical requirements without written authorization from the Owner.

C-8.3 Gap Report and Stop-Work for Unresolved Compliance Pathways

If the Contractor is uncertain about the applicable contract requirement for a condition affecting the Work, the Contractor shall submit a written gap report describing the condition, the affected Work, and the specific decision needed. The Contractor shall suspend the affected activity until the Owner provides written direction.

C-8.4 Field Change Log

The Contractor shall maintain a running log of field changes, deviations, and corrective actions for inclusion in closeout deliverables to the extent required by Volume 2.

C-9 Scope Firewall and Non-Coordination

C-9.1 Scope Firewall

The Contractor's responsibilities are limited to the Work under this remediation Contract as defined by the Contract Documents.

C-9.2 No Management of Other Parties

The Contractor shall not direct or manage the schedules, staffing, means and methods, or performance of other contractors or parties operating at the Site.

C-9.3 No Spread Attributable to Contractor's Work

The Contractor shall implement controls sufficient to prevent uncontrolled migration or recontamination attributable to the Contractor's Work and shall document corrective actions taken in response to any conditions attributable to the Contractor's Work.

C-10 IC and O&M Boundary**C-10.1 Owner Responsibilities**

IC administration and long-term O&M are Owner responsibilities.

C-10.2 Contractor Responsibilities

The Contractor shall provide, as part of closeout, the as-built documentation generated by the Contractor's Work and other stewardship record inputs required by Volume 2 and the Cleanup Plan.

C-10.3 No O&M Manuals or Long-Term Inspection Programs

Unless expressly included by written amendment, the Contractor shall not prepare or update long-term O&M manuals, inspection schedules, or ongoing inspection logs under this Contract.

C-11 EPA Site Access and Cooperation**C-11.1 Right of Access**

The Contractor shall provide EPA Region 7 representatives and their designated agents with access to the Project site, work areas, waste storage areas, equipment, records, and personnel upon request. This obligation is consistent with the inspection authority granted to EPA under the Toxic Substances Control Act (15 U.S.C. 2610) and applies throughout the duration of the Contract.

C-11.2 Cooperation During Inspections

When EPA representatives are on site, the Contractor shall provide reasonable cooperation, including making work areas accessible, making knowledgeable personnel available for questions, and providing copies of requested records within a reasonable time. The Contractor shall not obstruct, delay, or condition EPA access. The Contractor shall notify the Owner and the Owner's Environmental Consultant promptly upon becoming aware of any EPA site visit, inspection request, or information request.

C-12 Post-Closeout Cooperation**C-12.1 Cooperation Obligation**

For a period of twelve (12) months following the date of final payment under this Contract, the Contractor shall provide reasonable cooperation with the Owner and the Owner's Environmental Consultant in connection with:

- a) EPA review of or inquiries regarding the Completion Report, verification data, waste documentation, or other Contract deliverables
- b) Recording of institutional control instruments (Environmental Covenant, Deed Notice, or equivalent) that require Contractor-generated as-built exhibits, boundary descriptions, or managed area documentation.
- c) Clarification or supplementation of Contractor-generated records where the Owner or Owner's Environmental Consultant determines that additional information is needed to respond to EPA or to complete closeout documentation.

C-12.2 Scope and Compensation

Reasonable cooperation includes responding to written inquiries within ten (10) business days, providing copies of retained records, and making knowledgeable personnel available for telephone or video conferences at mutually convenient times. The Contractor shall not be required to perform new field work, sampling, or analysis under this provision. If EPA directs additional field work after Contract closeout, such work shall be separately procured by the Owner.

Cooperation under this provision shall be at no additional cost to the Owner for reasonable inquiry responses and record production. If a specific EPA inquiry requires Contractor effort exceeding eight (8) person-hours in total during the cooperation period, the Owner and Contractor shall negotiate compensation for the additional effort at the Contract's applicable billing rates.

Exhibit D - Owner-Issued Drawing and Specification Lists

Bidders shall rely on the Volume 3, Exhibit C, for drawing and detail references.

1. Relationship to Governing Technical Document

The drawing and specification lists do not modify the Cleanup Plan or the acceptance, verification, or documentation gates established in Volume 2 and the Cleanup Plan.

2. Use

The Contractor shall use the drawings and indices for orientation, access planning, and location referencing for documentation (including as-built markups generated from the Contractor's Work).

VOLUME 2 – TECHNICAL SCOPE AND COMPLIANCE REQUIREMENTS

PART IV – TECHNICAL SCOPE OF REMEDIATION SERVICES

Section 1 – Governing Technical Document and Scope Boundaries

1.1 Governing Technical Document

The Work under this Contract shall implement the EPA-approved MET Center Risk-Based Cleanup and Disposal Application (Cleanup Plan), including any EPA approval conditions issued prior to Notice to Proceed. The Cleanup Plan is the primary governing technical document for this procurement and is incorporated into the Contract Documents as specified in Volume 3. Where suspect or confirmed ACM or LBP may be encountered in connection with the Work, the EWI Hazardous Building Materials Report dated November 2025, as incorporated in Volume 3, shall be used as a companion technical reference for reported material locations, hazard identification, and multi-hazard work planning, but it does not modify the Cleanup Plan or the contract hierarchy.

1.2 Performance-Based Execution and Contractor Means and Methods

This procurement is performance-based. The Contractor shall select and implement compliant means and methods that achieve the Cleanup Plan performance endpoints and the verification and documentation deliverables required by this Volume. The RFP does not prescribe detailed means and methods, provided the Contractor remains within the Cleanup Plan framework and complies with applicable requirements, including TSCA (40 CFR Part 761, including §761.60, §761.61, and §761.62 as applicable), OSHA, NESHAP where applicable, and applicable State and local requirements.

1.3 Operating Facility, Cross-Contamination Control, and Scope Firewall

The Work will be performed in an operating facility. The Contractor shall comply with Owner-directed access restrictions and work-hour constraints and shall implement work controls sufficient to maintain safe operations, controlled access, and occupant protection. The Contractor's responsibility is limited to managing its own Work and preventing uncontrolled migration or recontamination attributable to its Work. The Contractor shall not direct or manage the schedules or means and methods of other parties performing work at the Site.

The Contractor shall implement containment and isolation controls sufficient to prevent uncontrolled migration or spread of PCB materials attributable to the Contractor's Work. This obligation applies to all areas, including currently uncontaminated areas, occupied spaces, verified areas that have achieved acceptance criteria, and areas containing new construction materials or equipment installed by others. If verification sampling demonstrates that the Contractor's Work has caused contamination or recontamination of any area, the Contractor shall remediate the affected area and perform re-verification at the Contractor's cost. The Contractor is not responsible for contamination caused by other parties' work or for coordinating the schedules or means and methods of other contractors.

1.4 IC and O&M Interface

Institutional controls (ICs) and long-term operations and maintenance (O&M) are Owner obligations. The Contractor shall support IC and O&M implementation by providing location-indexed as-built documentation, verification documentation, waste documentation, and other stewardship record inputs generated by the Contractor's Work, as required by the Cleanup Plan and this Volume.

Section 2 – Contractor Minimum Technical Responsibilities

The Contractor shall furnish all labor, supervision, equipment, materials, tools, incidentals, administration, and services necessary to perform and complete the Work in strict accordance with the Contract Documents. Without limiting any other requirements, the Contractor shall:

Implement Work controls sufficient to meet the performance endpoints and verification rules in Part V before any area is proposed for turnover.

Implement waste classification, segregation, packaging, storage, and disposal routing in accordance with Part VI.

Produce the documentation deliverables in Part VII and Part VIII, including turnover documentation packages, as-built documentation generated by the Contractor's Work, and completion documentation inputs.

Implement the Health and Safety and cross-contamination control requirements in Part VIII as minimum performance constraints.

Comply with change management controls in Part VIII, including field change documentation and escalation for material changes requiring EPA coordination through the Owner or the Owner's Environmental Consultant.

Part V – Verification Framework and Acceptance Criteria

Section 3 – Decision Metric and Acceptance Criteria

3.1 Decision Metric

Compliance determinations for turnover decisions shall be based on Total PCBs per sample, defined as the sum of detected Aroclors within the sample matrix. Total PCBs is the primary decision metric for all acceptance criteria determinations under this Contract. Individual Aroclor results shall be reported for each sample, and Total PCBs shall be calculated as the mathematical summation of all detected Aroclors. Reporting limits shall be sufficiently low to support a compliance determination. If a reporting limit exceeds an applicable acceptance criterion in a turnover decision location, the result is inconclusive for turnover purposes and shall be resolved through additional verification consistent with this Part.

3.2 Acceptance Criteria Used for Turnover Decisions

Acceptance criteria are applied on a Total PCBs basis to determine whether the remedy has achieved the performance objectives for turnover and protectiveness. The following acceptance criteria govern turnover decisions:

- Indoor Air: less than or equal to 0.0215 $\mu\text{g}/\text{m}^3$ Total PCBs (21.5 ng/m^3 ; $2.15 \times 10^{-5} \text{ mg}/\text{m}^3$). Applied for turnover of Verification Units to high-occupancy use and for post-installation performance confirmation where required.
- Non-Porous Wipes: less than or equal to 10 $\mu\text{g}/100 \text{ cm}^2$ Total PCBs. Applied for turnover and confirmation of cleaned or controlled non-porous surfaces.
- Porous Bulk Materials: less than or equal to 1 mg/kg Total PCBs. Applied for turnover confirmation where porous removal or treatment is performed.

Analytical reporting limits are performance requirements for the sampling program and are not acceptance criteria. Reporting limits must be sufficiently low to support a compliance determination. Where reporting limits exceed the applicable acceptance criterion, the result is treated as inconclusive for turnover purposes and is resolved by adjusting sampling conditions or by an alternative verification approach consistent with Section 5.1.2.

Section 4 – Verification Unit Framework and Minimum Verification Logic

4.1 Verification Units

For implementation and verification, the facility is divided into discrete Verification Units (VUs). A VU is the smallest practical decision unit for turnover and verification and is defined by all of the following:

1. A contiguous area with a common use condition (high occupancy, restricted low occupancy, or exterior work control only).
2. A common HVAC service condition (served by the same air distribution zone or isolated from it).
3. A common remedy category (for example, coating removal versus in-place management under IC/O&M).

VU boundaries shall be documented on field sketches and in the Completion Report. The Contractor shall propose VU boundaries for Owner and Owner's Environmental Consultant review as part of the pre-mobilization submittal process. VU boundaries may be refined during implementation based on field conditions, provided that refinements are documented through the field change process described in Part VIII.

Verification triggers that require verification sampling are defined in Section 4.2.

4.2 Required Verification Triggers

Verification sampling is required when one or more of the following triggers occurs:

- Turnover Trigger: A VU is proposed for turnover to high-occupancy use or routine access beyond restricted low-occupancy controls.
- Remedy Confirmation Trigger: A remedy element requires confirmation by its nature, including (a) porous-material removal that relies on depth-limited treatment, (b) encapsulation where eligibility is met and ongoing O&M applies, or (c) HVAC cleaning or replacement steps intended to prevent recontamination of new equipment.
- Recontamination Control Trigger: A VU contains or interfaces with a pathway that could recontaminate a cleaned or upgraded area (for example, adjacency to restricted zones, dust reservoirs, or work that opens pathways through the building envelope).

Restricted zones that remain restricted and are not proposed for turnover are managed through IC/O&M and performance monitoring under Part VII, not through broad verification sampling commitments in this Part.

4.3 Contractor Verification Readiness Determination

The Contractor shall notify the Owner's Representative in writing when a Verification Unit is ready for verification sampling. "Ready for verification" means:

1. All source control work planned for that Unit is complete
2. Visual cleanliness has been achieved (no visible residues or dust accumulations)
3. The Contractor has implemented controls sufficient to prevent recontamination during the verification period

4. All Contractor pre-verification quality checks (if any) are complete

The Contractor's readiness determination is a performance decision. Premature verification requests that result in failed sampling or require re-verification due to ongoing dust-generating work are the Contractor's responsibility and cost.

4.4 Non-Porous Wipe Verification Requirements

Wipe sampling is used to confirm that non-porous surfaces within a VU meet the wipe acceptance criterion and that residual dust films have been controlled to prevent transfer and recontamination.

Minimum Requirements Per VU (Turnover Areas): Collect at least five (5) wipe samples per VU, including:

- At least two (2) biased wipes from high-touch or high-transfer points (for example, handrails, door hardware, work surfaces, controls, or frequently contacted edges).
- At least two (2) biased wipes from interfaces and edges (penetrations, perimeter joints, equipment interfaces, transitions between treated and untreated surfaces).
- At least one (1) representative wipe from a typical interior location within the VU.

For large VUs or where complexity is high (multiple interfaces or equipment), collect additional wipes to ensure each distinct interface condition is represented. Wipe locations shall be documented and mapped for traceability.

Decision Rule: Any confirmed wipe result above 10 µg/100 cm² Total PCBs requires corrective cleaning or additional control in the affected area and re-verification before turnover.

4.5 Porous Bulk Verification Requirements

Bulk verification is used only where porous materials are actively treated or removed as part of the remedy and where confirmation is needed to demonstrate the porous acceptance criterion for turnover.

Minimum Requirements:

- For each discrete treated location, collect at least one post-treatment bulk sample from the treated substrate.
- Where treatment spans a large continuous area, collect additional bulk samples so that spatial coverage is representative of the treated extent and any boundary conditions (edges, transitions, visible condition changes) are captured.

Bulk sampling is not required in zones that remain under restricted controls with no turnover objective, unless a defined trigger in Section 5.4 occurs.

Decision Rule: Any confirmed porous bulk result above 1 mg/kg Total PCBs in a turnover VU requires additional treatment or an alternate control consistent with the Cleanup Plan and re-verification before turnover.

4.6 Indoor Air Confirmation Requirements

Indoor air sampling is used as the primary performance confirmation that (1) source controls are effective in receptor zones, (2) HVAC protection measures have prevented recontamination of new or

cleaned components, and (3) barrier and cap performance is protective in areas proposed for high-occupancy use.

Minimum Requirements for Turnover:

- Collect indoor air samples in VUs proposed for high-occupancy turnover, using sampling durations and volumes sufficient to support reporting limits below the indoor air acceptance criterion.
- Indoor air sample placement shall represent typical receptor locations in the VU and any locations important to confirming performance (for example, near served supply zones, near interfaces with restricted areas, or near known prior impact areas relevant to turnover).

Post-Remedy Confirmation Cadence: For VUs transitioned to high occupancy, indoor air confirmation shall be conducted on a biannual basis during the initial post-remedy period as part of performance confirmation and breakthrough monitoring. The locations and extent shall be focused and representative and are not a standing commitment to facility-wide indoor air monitoring in zones that remain restricted and are not proposed for turnover.

Decision Rule: Any confirmed indoor air result above 0.0215 µg/m³ Total PCBs in a turnover VU triggers an evaluation of potential sources, pathway controls, and HVAC protection measures, followed by corrective action and re-sampling sufficient to support a compliance determination for that VU before turnover.

4.7 HVAC Wipes and HVAC Protection Confirmation

HVAC confirmation wipes are used to document that HVAC cleaning or replacement activities have controlled residues that could otherwise contaminate served areas or new equipment. Where HVAC cleaning is performed as a protective measure for a served VU:

- Collect confirmation wipes from representative cleaned HVAC interior components where accessible, such as supply-side surfaces, return-side surfaces, and a representative internal component (for example, coil housing or drain pan area).
- The purpose of HVAC wipes is to confirm that residues have been controlled to protect the served area and equipment. HVAC wipes support the protective narrative but do not replace VU turnover verification, which is determined by the acceptance criteria in Section 3.2 and the VU verification results.

HVAC wipe results are evaluated against the non-porous wipe acceptance criterion unless the surface or template condition requires a matrix-appropriate evaluation consistent with the analytical methods in Section 4.9.

4.8 Verification Plan Matrix

The Contractor shall implement the minimum sampling densities, acceptance criteria, and re-test triggers below. Where multiple minimum requirements apply, the more stringent requirement governs.

Matrix	Minimum Density or Coverage	Acceptance Criterion (Total PCBs)	Re-Test Trigger / Required Response	Comments
Non-Porous Surfaces (post-cleaning or post-abatement)	Minimum one wipe per 100 ft ² of treated or cleaned non-porous surface within each VU, plus biased wipes at high-touch and high-dust accumulation points.	≤10 µg/100 cm ²	Any confirmed result >10 µg/100 cm ² , or an inconclusive result where the reporting limit exceeds 10 µg/100 cm ² .	Re-clean and re-sample until compliant. Apply the Total PCBs decision metric and QA/QC rules.
Porous Concrete (treated zones and localized removals)	Depth-discrete cores sufficient to represent the treated zone. Minimum one core per 200 ft ² of treated area, plus at least one core at each treatment boundary and at any biased location.	≤1 mg/kg	Any confirmed result >1 mg/kg, or an inconclusive result where the reporting limit exceeds 1 mg/kg.	Perform additional removal or treatment and re-core until compliant. Document depth intervals and patch locations.
HVAC Interiors (unit interiors, plenums, coils, drain pans)	Minimum three wipes per HVAC unit interior (supply plenum, return plenum, and a coil or drain pan surface), plus additional biased wipes where visible residue is present.	≤10 µg/100 cm ²	Any confirmed result >10 µg/100 cm ² , or an inconclusive result where the reporting limit exceeds 10 µg/100 cm ² .	Re-clean and re-sample. Replace liners or components if cleaning cannot achieve compliance. Protect HVAC components from recontamination.
Duct Tops and Overhead Ledges (reservoir surfaces)	Minimum one wipe per 200 linear feet of accessible duct top or overhead ledge within each served pathway, with biased locations at visible dust accumulation and near supply or return transitions.	≤10 µg/100 cm ²	Any confirmed result >10 µg/100 cm ² , or an inconclusive result where the reporting limit exceeds 10 µg/100 cm ² .	HEPA vacuum and wet clean; re-sample until compliant for turnover. Maintain housekeeping and inspection triggers for restricted areas.
Indoor Air (post-work confirmation in applicable zones)	Minimum one sample per zone of 24-hour duration, unless an alternate duration is justified and documented. Perform at least two seasonal rounds (cooling and heating) where required for turnover or performance confirmation.	≤0.0215 µg/m ³ (21.5 ng/m ³)	Any result >0.0215 µg/m ³ , or an inconclusive result where the reporting limit exceeds 0.0215 µg/m ³ .	Adjust HVAC settings as needed, implement corrective actions, and re-sample consistent with decision rules and EPA approval conditions.

4.9 Analytical Methods and QA/QC

Sampling and analysis methods shall be selected to produce defensible Total PCB results appropriate for decision-making and verification.

- Aroclor Analysis: Bulk and wipe samples shall be analyzed using PCB Aroclor methods consistent with SW-846 8082A or equivalent laboratory procedures, with Total PCBs calculated as the sum of detected Aroclors.
- Wipe Sampling: Wipe collection shall follow 40 CFR §761.123 methods and template requirements unless an alternate equivalent approach is explicitly justified and documented for a specific surface condition.
- Indoor Air: Indoor air sampling shall be performed using EPA TO-10A or TO-4A-equivalent methods, with volumes and durations selected to achieve reporting limits sufficient for comparison to the indoor air acceptance criterion.

Field QA/QC shall include standard elements such as duplicates at a frequency appropriate to the number of samples collected in a given event, equipment blanks where applicable, and chain-of-custody controls. Laboratory QA/QC review shall be performed before results are used for turnover decisions.

The following table summarizes analytical methods, target reporting limits, and sample media.

Matrix	Method or Approach	Target Reporting Limit	Notes
Paint Chips (bulk)	SW-846 Method 8082A or equivalent for Aroclors; report Total PCBs as the sum of detected Aroclors.	At or below 1 mg/kg Total PCBs	Report Aroclor-specific results and Total PCBs. Use discrete results for remedy decisions.
Caulk, Sealant, and Mastic (bulk product)	SW-846 Method 8082A or equivalent for Aroclors; report Total PCBs.	At or below 1 mg/kg Total PCBs	Any laboratory compositing is for screening only and is not used to demonstrate compliance or to change waste type.
Concrete Cores (porous substrate)	SW-846 Method 8082A or equivalent for Aroclors; report Total PCBs. Collect depth-discrete intervals as needed.	At or below 1 mg/kg Total PCBs	Use depth-discrete results to confirm removal or treatment to the porous acceptance criterion. Document depth intervals.
Non-Porous Surface Wipes	Wipe sampling per 40 CFR §761.123 with laboratory analysis for Aroclors and Total PCBs.	At or below 10 µg/100 cm ² Total PCBs	Use a 10 cm by 10 cm template. Report in µg/100 cm ² . Apply Total PCBs decision metric and QA/QC rules.
Indoor Air	EPA Method TO-10A or TO-4A equivalent for Total PCBs.	At or below 0.0215 µg/m ³ Total PCBs	Select sampling volumes and durations to achieve reporting limits sufficient for comparison to the indoor air acceptance criterion.

Section 5 – Data Evaluation, Exceedance Response, and Turnover Determination

5.1 Data Evaluation and Decision Rules

5.1.1 Total PCBs as the Decision Metric

Total PCBs for each sample shall be calculated as the sum of all detected Aroclors reported for that sample. The resulting Total PCB concentration, rather than any individual Aroclor concentration, shall be compared with the applicable project acceptance criterion. Where more than one Aroclor is detected, individual Aroclor results shall not be evaluated separately to determine compliance. Individual Aroclor results shall remain part of the analytical and project record.

5.1.2 Detection Limits and Non-Detect Handling. Compliance determinations shall be made using both detections and reporting limits:

- If no Aroclors are detected and the reporting limit is at or below the applicable acceptance criterion, the sample is considered compliant.
- If Total PCBs are detected below the applicable acceptance criterion, the sample is considered compliant subject to QA/QC review.
- If the reporting limit is above the applicable acceptance criterion, the result is treated as inconclusive for turnover and shall be resolved by adjusting sampling conditions (for example, higher air volume or longer duration) or by alternative verification consistent with this Section.

5.1.3 Comparator Application. Acceptance criteria in Section 3.2 are the controlling basis for turnover verification. EPA Regional Screening Level comparisons are used as screening and interpretive comparators where applied in the Cleanup Plan and are evaluated on a Total PCBs basis consistent with EPA direction.

5.2 Exceedance Response and Re-Verification

If a confirmed exceedance occurs in a turnover VU, the Contractor shall:

1. Identify the affected micro-area and likely source or pathway driver (surface condition, dust reservoir, interface condition, HVAC protection breach, or work control failure).
2. Implement corrective action consistent with the Cleanup Plan remedy framework and the work controls in Part VIII.
3. Re-verify the affected area with sufficient sampling to demonstrate that the applicable acceptance criterion is met before turnover.

Corrective actions shall be documented with sufficient detail to demonstrate the condition was addressed and that re-verification results support compliance. Exceedance response documentation shall be included in the VU turnover package and the Completion Report.

5.3 Turnover Gate

Turnover is a written release of a VU or defined portion of a VU for routine use or high-occupancy use, issued only after review of verification results and documentation demonstrating that the applicable acceptance criteria in Section 3.2 have been met and that required work controls and O&M elements are in place. Turnover is not equivalent to remediation complete or work complete. Remediation

completion describes contractor scope status; turnover is an environmental status determination supported by accepted verification and documented as a written authorization in the project record.

The Contractor shall not represent an area as suitable for routine use unless verification results support that determination and the turnover documentation package has been accepted by the Owner or the Owner's Environmental Consultant. If an exceedance is confirmed, corrective action and re-verification are required before turnover. Turnover determinations and the supporting documentation package shall be maintained in the permanent site record and summarized in completion documentation prepared under this Contract.

5.4 Conditional Implementation Checks and Optional Sampling Contingencies

Conditional implementation checks are optional and are performed only under defined triggers. These checks are limited in scope and are not a commitment to new facility-wide characterization. Where performed, results shall be evaluated on a Total PCBs basis and documented in field memoranda and the Completion Report.

Optional sampling is allowed only if at least one of the following triggers occurs, and any such sampling is limited to the decision purpose and is not a commitment to new facility-wide characterization:

Inconclusive Result Trigger: A reporting limit exceeds an applicable acceptance criterion in a critical turnover decision location and the result cannot support a compliance determination.

Unexpected Condition Trigger: Previously undocumented suspect material conditions are encountered within a VU proposed for turnover and the condition is inconsistent with the assumptions supporting remedy selection, including unexpected dust reservoirs at decision-critical interfaces.

Breakthrough Trigger: Evidence of barrier or encapsulation compromise is observed, or post-remedy performance results indicate a credible recontamination pathway.

Change Management Trigger: Intrusive work is proposed that penetrates or materially alters a barrier in a manner that could create a new pathway relevant to a receptor zone.

EPA-Directed Trigger: EPA requests targeted additional data for a defined decision purpose.

Results from conditional checks or optional sampling, where performed, shall be evaluated on a Total PCBs basis and documented in field memoranda and completion documentation. Conditional sampling performed under these triggers shall be priced under the applicable contingency and Owner-directed line items on Exhibit X-9 (Unit Price Schedule).

Part VI – Waste Management and Disposal Requirements

Section 6 – Waste Classification and Segregation

6.1 Governing Framework

Waste management under this Contract shall conform to the Cleanup Plan (Volume 3, Exhibit A), 40 CFR Part 761, and EPA approval conditions. Waste designation follows TSCA definitions and is based on the nature and origin of the material and how it is removed, not on sampling alone. The Contractor shall maintain waste classification, segregation, packaging, storage, and disposal routing in accordance with this Part throughout the duration of the Work.

6.2 Waste Designation at Point of Generation

Waste designations shall be made in the field at the time of removal based on the configuration and origin of each material and how it is removed, consistent with TSCA definitions and the Cleanup Plan. Sampling may be used to support waste profiling and receiving facility acceptance for a defined waste stream. Sampling does not change which TSCA definition applies.

6.3 Required Waste Classes

PCB Remediation Waste: Contaminated media and substrates impacted by spills, oiling, deposition, or migration, including concrete, masonry, metals, dust, and coating-removal debris. PCB remediation waste is managed under 40 CFR §761.61.

PCB Bulk Product Waste: Manufactured PCB products and product layers such as caulk, sealants, mastics, and similar materials, including substrate pieces removed together with the product when the product remains adhered at removal and designation for disposal. PCB bulk product waste is managed under 40 CFR §761.62.

PCB Articles and PCB Liquids: Items and fluids managed under TSCA article and liquid provisions as applicable, including PCB-containing ballasts under 40 CFR §761.60 and decontamination fluids.

6.4 Project Bulk Product Rule (Adhered vs. Separated)

When a manufactured PCB product remains adhered to a building substrate at the time of removal, the combined item may be managed as PCB Bulk Product Waste under 40 CFR §761.62, consistent with EPA's 2012 bulk product reinterpretation, provided that the primary PCB source is the original product and not historical spill or oiling contamination.

When the product is separated from the substrate prior to disposal, the separated product is PCB Bulk Product Waste and the remaining contaminated substrate is PCB Remediation Waste managed under 40 CFR §761.61. The Contractor shall not separate product from substrate solely to change waste classification.

6.5 Segregation and Prohibition on Dilution

The Contractor shall segregate waste streams by classification at the point of generation and manage each stream to prevent commingling. Waste dilution is prohibited. Materials shall be evaluated based on their discrete in-situ source concentrations. The Contractor shall not commingle clean construction debris with contaminated structural matrices or other regulated materials to artificially achieve mass-averaged concentrations below applicable TSCA thresholds.

Section 7 – Disposal Routing and Facility Requirements

7.1 Disposal Routing for PCB Remediation Waste

PCB remediation waste generated under this Contract shall be routed to disposal facilities as follows:

- Materials with Total PCBs at or above 50 mg/kg shall be managed as TSCA PCB remediation waste and routed to TSCA-approved chemical waste landfills, RCRA Subtitle C hazardous waste landfills, or TSCA high-temperature incinerators.
- Materials with Total PCBs below 50 mg/kg shall be managed as PCB remediation waste under 40 CFR §761.61, with disposal options and facility selection determined on a case-by-case basis in consultation with EPA through the Owner and the Owner's Environmental Consultant and documented in the Completion Report.

Disposal routing for remediation waste shall be documented for each waste stream and included in the Completion Report, with classification, concentration ranges, and disposal facilities identified for each stream.

7.2 Disposal Routing for PCB Bulk Product Waste

PCB bulk product waste such as pre-1978 caulks, certain glazing compounds, mastics, and similar manufactured products (including attached substrate pieces removed with the product intact) shall be managed under 40 CFR §761.62.

- Subtitle D disposal under 40 CFR 761.62(b)(1) or (b)(2) may be used for eligible non-liquid PCB bulk product waste where state and facility conditions are met and the receiving facility has accepted the waste stream. For waste managed under 40 CFR 761.62(b)(1), the Contractor shall prepare and provide the written notice required by 40 CFR 761.62(b)(4)(i) to the receiving facility at least 15 days before the first shipment from the waste stream and shall provide a copy to the Owner and Owner's Environmental Consultant. For waste managed under 40 CFR 761.62(b)(2), the Contractor shall comply with the notice and landfill-condition requirements of 40 CFR 761.62(b)(4)(ii), as applicable. The Contractor shall obtain any required MoDNR special-waste authorization and receiving-facility approval before shipment.
- Where Subtitle D disposal is not available or not appropriate, bulk product wastes shall be sent to TSCA-approved chemical waste landfills or TSCA high-temperature incinerators.

7.3 Disposal of PCB Articles and Liquids

PCB articles and PCB liquids, including any PCB-containing ballasts and oils, shall be managed under 40 CFR §761.60 through vendor-managed programs or TSCA-approved facilities. The Contractor shall not dismantle PCB articles in the field. Chain-of-custody documentation shall be maintained through the vendor program.

7.4 Waste Stream Classification Matrix

All PCB wastes shall be marked, labeled, and manifested consistent with 40 CFR Part §761. The following matrix summarizes classification, packaging, and primary disposal pathways for each major waste stream.

Waste Stream	TSCA Waste Category and Basis	Containers	Typical Receiving Facility Type	Key Notes and Controls
Coating Debris (paint chips, blast fines, spent media)	PCB remediation waste under 40 CFR §761.61. Generated during disturbance and removal activities.	Lined roll-offs, supersacks, or drums; covered and labeled	TSCA-approved disposal facility; RCRA Subtitle C if hazardous waste characteristics apply	Segregate by waste stream. Prevent commingling with bulk product waste. Track loads and maintain waste profiles and manifests.
Sealants and Caulks Removed with Adhered Substrate	PCB bulk product waste under 40 CFR §761.62 when bulk product remains adhered to substrate at removal. Separated substrate is PCB remediation waste under §761.61.	Lined roll-offs or drums; manage to prevent release	Subtitle D where allowed under §761.62(b)(1) or (b)(2), or TSCA-approved facility	Do not separate product from substrate solely to change classification. Provide required notices and meet state and facility acceptance criteria.
Floor Tile and Mastic	PCB bulk product waste under 40 CFR §761.62 for manufactured product. Contaminated residual substrate is PCB remediation waste under §761.61.	Lined roll-offs, covered and labeled	Subtitle D where allowed under §761.62, or TSCA-approved landfill	Keep product waste segregated. Manage dust and debris controls during removal. Treat stained or contaminated substrate as remediation waste if removed.
HVAC Dust, Filters, and Replaceable Components	PCB remediation waste under 40 CFR §761.61. Reservoir materials and filters generated through cleaning and replacement.	Bags within drums, or lined containers; sealed and labeled	TSCA-approved landfill; RCRA Subtitle C if hazardous waste applies	Document component identifiers, locations, and load tracking. Do not blow down or dry-sweep. Maintain cleaning and verification records.
Concrete and Masonry Debris	PCB remediation waste under 40 CFR §761.61. Concrete removed from areas impacted by historical spills, oiling, or dust.	Lined roll-offs; covered and labeled	TSCA-approved disposal facility; RCRA Subtitle C if applicable	Includes cap segments and underlying slab material if removed. Manage based on Total PCBs and other hazardous waste characteristics.
PPE, Poly Sheeting, and Disposable Containment	PCB remediation waste under 40 CFR §761.61. Generated during regulated work.	Bags within drums or lined roll-offs; sealed and labeled	TSCA-approved landfill; other permitted facility where allowed	Use representative profiling consistent with waste stream knowledge. Maintain segregation and prevent release during handling.

Waste Stream	TSCA Waste Category and Basis	Containers	Typical Receiving Facility Type	Key Notes and Controls
Decontamination Fluids	PCB liquids managed under 40 CFR §761.60 and applicable disposal requirements.	Totes or drums; closed and labeled	Approved liquid treatment or disposal facility	Profile each batch before shipment. Prevent discharge to stormwater or sanitary systems unless explicitly permitted and documented.
Fluorescent Light Ballasts (historic PCB-containing)	PCB articles managed under 40 CFR §761.60, typically via vendor-managed collection and disposal.	Approved ballast containers or drums; intact and labeled	TSCA-approved disposal pathway via vendor or approved facility	Do not dismantle ballasts in the field. Maintain chain-of-custody through vendor program.

7.5 Material-Specific Classification Rules

The Contractor shall apply the following material-specific classification rules, which are derived from the Cleanup Plan:

Exterior Brick and Mortar: When removed from historically oiled or dust-impacted areas, brick and mortar shall be classified as PCB remediation waste, regardless of concentration, because PCB impacts are primarily from historical oiling and deposition rather than from a manufactured PCB product.

Interior and Exterior Concrete (including overlays and caps): Concrete removed from areas impacted by historical spills, oiling, or dust shall be managed as PCB remediation waste. The existing 1980s warehouse concrete overlay cap is treated as an engineered barrier; although not currently planned as part of the remediation Work, any removed segments of the cap or underlying slab shall be classified as PCB remediation waste.

Paints, Mastics, and Coatings: Coating debris, blasting media, and dust from historically oiled or dusty areas are classified as PCB remediation waste. Where a discrete manufactured product (for example, a PCB-containing mastic or coating system) can be removed with minimal substrate and its PCB content is dominated by the original product rather than by oil intrusion, that debris may be classified as PCB bulk product waste and managed under §761.62.

Caulks and Sealants: Pre-1978 caulk and expansion joint materials identified as PCB-containing shall generally be managed as PCB bulk product waste, including substrate pieces removed together with the caulk, consistent with EPA's 2012 bulk product reinterpretation, provided that the primary source is the original product. Joint materials demonstrably impacted by oil migration rather than by original product content shall be treated as PCB remediation waste.

North Tower Exclusion: The North Tower is not included in the active removal or encapsulation scope under this Contract. Building materials within the North Tower are not designated as PCB waste at this time and will continue to be managed in place under ICs. If any North Tower materials are disturbed or removed in the future, waste classification and routing will be determined at that time in consultation with EPA. North Tower characterization data are used solely to support the closure-in-

place and institutional control strategy and are not used to drive waste classification decisions for other building areas.

Section 8 – Temporary Storage, Decontamination, and Manifesting

8.1 Temporary Storage Requirements

PCB waste subject to 40 CFR 761.65 shall be stored in compliance with the applicable storage-for-disposal requirements. PCB items and containers qualifying under 40 CFR 761.65(c)(1) may be stored for up to 30 days in an area that does not meet the storage-unit requirements of 40 CFR 761.65(b), provided the applicable dating, marking, container, inspection, and other requirements are met. Any PCB waste stored beyond that 30-day period shall be transferred to a storage area meeting 40 CFR 761.65(b), unless another applicable regulatory provision or EPA approval authorizes the storage arrangement. The Contractor shall minimize onsite accumulation and coordinate shipments to maintain compliance with the applicable disposal time limits in 40 CFR 761.65(a).

PCB remediation wastes and PCB bulk product wastes shall be staged in clearly segregated areas or containers, with labels indicating classification, source area, and intended disposal facility type (TSCA landfill, RCRA Subtitle C landfill, Subtitle D landfill, or TSCA incineration). Containers for PCB articles and liquids shall be segregated from solid wastes, with secondary containment appropriate for liquid management.

8.2 Equipment and Area Decontamination

Reusable tools and equipment shall be decontaminated consistent with 40 CFR §761.79 standards. Rinsates and disposable media generated during decontamination shall be managed as PCB remediation waste unless analytical or wipe data demonstrate that PCB concentrations are below applicable decontamination standards.

Prior to demobilization, designated staging areas and equipment shall meet the non-porous wipe acceptance criterion of 10 µg/100 cm² Total PCBs. The Contractor shall collect decontamination wipe samples and provide clearance results to the Owner and Owner's Environmental Consultant before releasing staging areas or removing equipment from the site.

Any decontamination fluid or detergent not expressly authorized by 40 CFR 761.79(c)(3)(iv) shall not be used unless the required validation study has been completed in accordance with 40 CFR Part 761, Subpart T, consistent with the EPA May 7, 2026 Conditional Approval. The Contractor shall provide the Owner and Owner's Environmental Consultant with the product identification, Safety Data Sheet, applicable validation-study documentation, and confirmation sampling results for inclusion in the Completion Report.

8.3 Manifesting, Storage, and Marking

Containers shall be closed, labeled, and stored on impervious secondary containment with timeframes coordinated to transport scheduling. All PCB wastes shall be marked, labeled, and manifested consistent with 40 CFR §761. Staging shall occur on impervious secondary containment with container closure verified prior to transport.

Waste profiles shall be prepared for each major waste stream (for example, coating debris, concrete rubble, blasting fines, caulks and sealants, filters, personal protective equipment, and investigation-derived waste). Manifests and bills of lading shall be compiled in the Completion Report, with classification (remediation waste, bulk product waste, article, liquid), concentration ranges, and disposal facilities documented for each stream.

Section 9 – Management of Untested and Newly Encountered Materials

During remediation, workers may encounter building materials that were not previously sampled but are suspected for PCB impacts based on age, location, staining, dust accumulation, or contact with historically oiled surfaces. Unless the disturbed material is a discrete manufactured product qualifying as PCB bulk product waste under 40 CFR §761.62, the default designation for known or reasonably suspected PCB-impacted building materials and debris is PCB remediation waste managed under 40 CFR §761.61. The Contractor shall manage untested and newly encountered materials using the following decision controls.

9.1 Field Identification and Segregation at the Point of Generation

Newly encountered materials shall be immediately assigned to one of the following waste stream types based on physical characteristics and the documented setting:

- Discrete Manufactured Product Waste Stream: Items that are manufactured PCB products or assemblies (for example, caulk and sealant beads, glazing compounds, mastics, adhesives, and similar product layers), including product removed with a small amount of attached substrate when the product remains adhered at the time of removal.
- Spill, Oiling, or Deposition Impacted Substrate or Secondary Media: Materials whose PCB impacts are attributable to historical oiling, staining, deposition, or contact, including concrete, masonry, metal substrates, dust, debris, and coating removal residuals generated from impacted areas.
- PCB Articles and Liquids: Articles (for example, light ballasts and other regulated articles) and liquids or decontamination fluids, which are managed under the applicable TSCA requirements for those streams.

Segregation and labeling shall be performed at the point of generation to prevent cross-contamination and to preserve waste designation integrity.

9.2 Default Management Rule for Untested Suspect Materials

For untested materials encountered in areas with documented or reasonably suspected spill, oiling, or dust deposition conditions, the default designation is PCB remediation waste once disturbed, and the material shall be managed and disposed under 40 CFR §761.61, unless it is clearly a discrete manufactured product waste stream as described in Section 9.1.

9.3 Bulk Product versus Remediation Waste Rule for Newly Encountered Materials

If the newly encountered material is a manufactured product layer (for example, caulk, sealant, glazing compound, mastic, adhesive, or a similar product) and the product remains adhered to the substrate at the time of removal, the combined item may be designated and managed as PCB bulk product waste under 40 CFR §761.62, consistent with the project bulk product rule in Section 6.4. If the product is separated from the substrate prior to disposal, the separated product is managed as PCB bulk product waste, and the remaining contaminated substrate is managed as PCB remediation waste under 40 CFR §761.61.

9.4 Limited Confirmatory Sampling

Confirmatory sampling does not change TSCA regulatory definitions. Sampling is used only to support a defensible application of the definitions and to support waste profiling and receiving facility acceptance. Limited confirmatory sampling may be performed only under one of the following conditions:

- **Waste Profile Support for a Discrete Product Stream:** A newly encountered material is reasonably believed to be a manufactured product waste stream and confirmatory sampling of the product component is needed to document PCB concentration for waste profiling and to evaluate available §761.62 disposal options.
- **Volume Threshold for a Defined Stream:** The volume of a single, well-defined stream is sufficiently large that profiling certainty is necessary to avoid mixed designations, to maintain segregation, and to support implementable disposal logistics.

Confirmatory sampling shall not be performed for the purpose of attempting to convert spill, oiling, or deposition impacted substrates or secondary media into PCB bulk product waste. Sampling scope, density, and methods shall follow the conditional sampling framework in Part V (trigger-based approach) and shall be documented in field change notices and the Completion Report.

Unforeseen or newly discovered PCB Remediation Waste with Total PCBs at or above 50 mg/kg shall be managed under the applicable contingency line item on Exhibit X-9 (Unit Price Schedule) and routed to an approved Subtitle C facility with appropriate TSCA/RCRA manifesting.

9.5 Materials Left in Place

Where a suspect material is not removed and remains in service, it is not designated as a waste stream under this Part. Such materials are managed through the remedy controls in the Cleanup Plan and the ICs and O&M program in Part VII, including mapping and inspection triggers where encapsulation or restricted access applies.

Part VII – Institutional Controls and O&M Interfaces

Section 10 – Contractor IC and O&M Support Deliverables

10.1 Scope and Allocation of Responsibilities

Institutional controls, the ICs instrument (deed notice or environmental covenant), the long-term O&M program, and the Stewardship Record are Owner obligations. The Contractor does not prepare, execute, or record the ICs instrument, and the Contractor does not prepare or maintain long-term O&M manuals, inspection schedules, or ongoing inspection logs under this Contract.

The Contractor's obligation under this Part is to produce documentation generated from the Contractor's Work that is sufficient for the Owner and Owner's Environmental Consultant to prepare IC technical attachment exhibits, Stewardship Record updates, and the Completion Documentation Package required under the Cleanup Plan and EPA approval conditions.

10.2 IC Instrument: Required Technical Content

The ICs instrument prepared by the Owner will, at a minimum:

1. Identify and map managed areas and engineered controls (including the warehouse cap and any encapsulated or otherwise restricted areas).
2. Establish enforceable use restrictions and activity restrictions (including restrictions on intrusive work that could compromise engineered barriers).
3. Require an O&M program with defined inspection, monitoring, recordkeeping, and corrective action requirements.
4. Establish notice and coordination requirements for activities that could disturb PCB remediation waste or compromise engineered controls.
5. Require that PCB remediation waste disturbed for any purpose be managed and disposed in accordance with Part VI and 40 CFR §761.61.

The Contractor's documentation deliverables in this Part shall be organized and formatted to support each of the above elements.

10.3 Minimum Required IC Support Deliverables

The Contractor shall provide the following documentation deliverables generated from the Contractor's Work:

10.3.1 As-Built Mapping and Documentation

Provide as-built mapping and documentation of managed areas and engineered controls affected by the Contractor's Work, including:

- Warehouse caps or barriers repaired, restored, or otherwise affected by the Work.
- Restricted zones where applicable.
- North Tower managed area boundary documentation generated from any physical isolation or barrier work performed by the Contractor.

- Encapsulated areas, including a location-indexed inventory with area identification, encapsulation system applied, surface condition at time of encapsulation, and date of application.

As-built mapping shall be prepared to a level of detail and accuracy sufficient for incorporation into Exhibit E-A (Warehouse Cap and Barrier-Controlled Areas), Exhibit E-B (North Tower Managed Area Boundary), and Exhibit E-C (Encapsulated Areas and Controlled Surfaces Inventory) of the IC instrument Technical Attachment. Final exhibits are completed by the Owner using the Contractor's as-built documentation.

10.3.2 Location-Indexed Photo Documentation

Provide location-indexed photographic documentation supporting final conditions and control locations for each managed area, engineered control, encapsulated surface, and restricted-zone boundary affected by the Work.

10.3.3 Engineered Control Interface Identification

Identify engineered control interfaces created, repaired, or modified by the Contractor's Work that are relevant to IC mapping and long-term protectiveness, including barrier penetrations, utility chases, interface transitions between treated and untreated areas, and any conditions requiring post-remedy inspection attention.

10.3.4 Encapsulation Inventory for O&M Tracking

Provide a location-indexed encapsulation inventory for each area where encapsulation is used as an engineered control. The inventory shall include area identification, encapsulation system type, surface dimensions, adhesion and condition documentation at time of encapsulation, and any interface conditions relevant to O&M inspection and repair triggers. This inventory feeds directly into the Stewardship Record and annual inspection checklists.

10.4 O&M Program: Contractor Interface Requirements

The O&M program maintains protectiveness after remedy implementation by ensuring engineered barriers remain effective, restricted-zone controls are maintained, dust reservoirs and recontamination pathways remain controlled, and performance confirmation monitoring is conducted as required. The Contractor's documentation shall support the following O&M program elements:

10.4.1 Engineered Barrier Documentation

For any warehouse cap, building slab barrier, or other engineered barrier element repaired, restored, or otherwise affected by the Contractor's Work, provide as-built condition documentation sufficient for incorporation into the O&M inspection baseline. Documentation shall address barrier integrity, any repairs performed, and conditions observed that may affect long-term performance. The Contractor shall not prepare or update long-term O&M manuals, inspection schedules, or ongoing inspection logs under this Contract.

10.4.2 HVAC System Documentation for O&M

Provide documentation of HVAC cleaning and replacement activities sufficient to establish the post-remedy HVAC baseline for O&M. Documentation shall include identification of cleaned or replaced components, post-cleaning verification wipe results, and any HVAC protection measures implemented

to prevent recontamination. This documentation supports the HVAC system protection, performance, and maintenance requirements in the O&M program.

10.4.3 Restricted Zone and Access Control Documentation

Provide documentation of restricted-zone boundaries, signage locations, lock installations, and access control measures established or modified by the Contractor's Work. Documentation shall be sufficient for the Owner to maintain access control logs, signage inspection records, and barrier condition documentation as part of O&M.

10.4.4 North Tower Managed Area Documentation

For the North Tower managed area, provide documentation generated from the Contractor's Work sufficient to support the legally recorded IC instrument exhibits and the closeout record. The North Tower is a permanently closed, non-occupiable managed area. No active interior mechanical demolition is included in this procurement. North Tower conditions do not set cleanup standards or verification obligations for other building areas.

10.5 Annual Inspection Checklist Inputs

The Contractor's as-built documentation shall include information sufficient for the Owner to establish and conduct annual inspections addressing the following items, consistent with the Cleanup Plan:

Engineered Barriers and Intrusive Work Controls: Warehouse cap condition (cracking, spalling, delamination, penetrations, repairs needed); building slab condition in designated control locations; evidence of unauthorized intrusive work in barrier footprints or restricted zones; review of planned intrusive work procedures.

Coatings and Encapsulation Condition: Encapsulated areas (adhesion, peeling, chipping, abrasion points, impact damage, repairs completed); paint-by-location-detection areas managed in place; interfaces and edges (penetrations, joints, transitions between treated and managed surfaces).

Exterior Materials and Release Prevention: Exterior coatings or sealants within O&M scope (peeling, chalking, chipping, failed sealants, debris accumulation); envelope integrity at openings and penetrations; evidence of exterior debris release or transport pathways.

Housekeeping and Dust Reservoir Controls: Ledges, equipment tops, mechanical interfaces, and other dust reservoir locations in turnover and interface areas; adequacy of cleaning methods and frequency; documentation of enhanced cleaning.

Access Controls and Signage: Restricted zones (locks operational, signage present and legible, entry log controls functioning); evidence of unauthorized access; verification that restricted-zone use conditions remain enforced.

Section 11 - Completion Documentation Inputs

11.1 Contractor Documentation for Completion Report

The Contractor shall provide the following documentation inputs generated from the Contractor's Work for assembly into the Completion Documentation Package required under the Cleanup Plan and EPA approval conditions. The Owner and Owner's Environmental Consultant are responsible for compiling, assembling, and submitting the final Completion Documentation Package to EPA.

Contractor documentation inputs shall include, at a minimum:

1. Summaries of implemented remedies by area and material type, organized by Verification Unit.
2. Verification sampling data sets and evaluation against acceptance criteria for each VU proposed for turnover.
3. Waste management and disposal documentation, including waste profiles, manifests, bills of lading, certificates of disposal or destruction, and classification records for each waste stream.
4. As-built exhibits and location-indexed inventories supporting IC instrument preparation, including encapsulation inventories, barrier documentation, and restricted-zone mapping.
5. Field change notices and supporting documentation for any conditions that required adjustment within the Cleanup Plan framework.
6. Health and safety documentation, including the site-specific HASP, training records, daily safety and containment logs, incident logs, and corrective action records.
7. Greener cleanup implementation summary describing practicable measures implemented during the Work.

11.2 Stewardship Record Contributions

The Stewardship Record is the set of records maintained by the Owner to document ongoing compliance with the ICs instrument and O&M program. The Contractor shall organize and deliver documentation generated from the Contractor's Work in a format compatible with incorporation into the Stewardship Record, including:

- As-built exhibits documenting final engineered control boundaries and encapsulated areas.
- Verification data packages supporting turnover determinations.
- Waste disposal records and receiving facility documentation.
- Post-remedy baseline conditions for O&M inspection elements.

The Contractor shall not prepare or maintain the ongoing Stewardship Record. The Contractor's obligation is limited to providing the documentation inputs described in this Section in a complete, organized format.

11.3 Documentation Format and Delivery

The Contractor shall deliver all documentation in electronic format (searchable PDF and native file format) plus one complete hard copy. Documentation shall be organized by Verification Unit and indexed to allow cross-reference between verification data, waste records, as-built exhibits, and the Volume 2 scope categories and Exhibit X-8 phase structure.

Delivery of documentation associated with each Work element shall occur within 30 calendar days following completion of that Work element, unless otherwise directed by the Owner or the Owner's Environmental Consultant. Final Completion Documentation inputs shall be delivered within 30 calendar days following completion of all Work and, in all cases, sufficiently early to support the Owner's obligation under the EPA May 7, 2026 Conditional Approval to submit the Completion Report to the Regional PCB Coordinator within 60 days of termination of activities subject to the approval.

11.4 Monthly Progress Data Inputs

During active implementation phases, the Contractor shall provide monthly progress data inputs to the Owner's Environmental Consultant to support the Owner's obligation to provide periodic progress updates to EPA Region 7 under Cleanup Plan Section 11.1. Monthly data inputs shall be submitted by the fifth (5th) business day of each calendar month for the preceding month's activities and shall include, at a minimum:

1. Status of source control work by Verification Unit, including percentage complete and description of activities performed.
2. Verification sampling status by Verification Unit, including number of samples collected, results received, and any pending laboratory analyses.
3. Waste shipment summary, including waste classification, volume or weight shipped, receiving facility, and manifest numbers.
4. Schedule status, including comparison of actual progress to the baseline schedule and identification of critical path items.
5. Notable deviations from the approved Cleanup Plan, including any field change notices issued during the reporting period.

The Owner's Environmental Consultant will compile Contractor data inputs into the format required for EPA communication. The Contractor is not responsible for preparing or transmitting the monthly updates to EPA.

PART VIII – SCHEDULE, PHASING, AND PROJECT CONTROLS

Section 12 – Phasing, Sequencing, and Operating Constraints

12.1 Phased Schedule Baseline

The Cleanup Plan establishes a phased schedule baseline organized around four implementation phases: Phase 0 (Work Plan Submittal and EPA Coordination), Phase 1 (Procurement, Mobilization Planning, and Interim Measures), Phase 2 (Remedy Implementation and Verification by Verification Unit), and Phase 3 (Completion Documentation, IC Recording, and Closeout). Milestone dates identified in the Cleanup Plan are planning targets and will be refined after EPA review, contracting, long-lead procurement, and building access sequencing are confirmed. Where EPA approval conditions establish specific timing or reporting intervals, those conditions govern.

12.2 RFP Phase Structure for Cost and Schedule Alignment

For purposes of cost estimation, schedule narrative, and progress tracking, the Work is organized into the phase structure defined in Exhibit X-8. The Contractor shall organize its proposal, NTE estimates, and schedule narrative using the following phases:

1. Phase 1: Pre-Mobilization and Submittal Development.
2. Phase 2: Coatings and Paint Remediation 3(Source Removal and Treatment).
3. Phase 3: Porous Concrete Work (Localized Removal and Treatment).
4. Phase 4: HVAC and Dust Reservoir Controls (Cleaning, Protection, and Integration).
5. Phase 5: Verification Sampling and Data Evaluation (Turnover Support).
6. Phase 6: Waste Management, Staging, and Decontamination (Handling).
7. Phase 7: IC/O&M Interface Support (As-Built, Managed Areas, and O&M Startup).
8. Phase 8: Closeout, Completion Report, and Stewardship Record Package.

Phases are not strictly sequential. Source control, verification, waste management, and documentation activities will overlap as work progresses through successive Verification Units. The Contractor shall identify in its proposal the logical dependencies between phases, anticipated duration of each phase, and critical path items.

For reference, the following general correspondence exists between Cleanup Plan phases and RFP phases: Cleanup Plan Phase 0 (Work Plan Submittal and EPA Coordination) corresponds to pre-NTP activities completed prior to Contract execution. Cleanup Plan Phase 1 (Procurement, Mobilization Planning, and Interim Measures) corresponds to RFP Phase 1. Cleanup Plan Phase 2 (Remedy Implementation and Verification by Verification Unit) corresponds to RFP Phases 2 through 6. Cleanup Plan Phase 3 (Completion Documentation, IC Recording, and Closeout) corresponds to RFP Phases 7 and 8. This mapping is for general reference. The Cleanup Plan phases and RFP phases serve different organizational purposes and are not required to align precisely in timing or sequence.

12.3 Verification and Deliverable Dependencies

The Contractor shall sequence its Work to achieve the performance outcomes required by the Contract Documents. The following dependencies establish the relationship between Contractor performance and Owner actions:

Verification Sampling Dependency: Verification sampling in any Verification Unit cannot occur until the Contractor has completed source control work (coating removal, concrete treatment, caulk and sealant removal) in that Unit and has achieved visual cleanliness (no visible residues or dust accumulations). The Contractor determines when source control work is sufficiently complete to support verification sampling.

Verification Unit Turnover Dependency: The Owner will not issue a Verification Unit turnover determination until verification results (wipe, bulk, and indoor air as required by Part V) demonstrate compliance with acceptance criteria. The Contractor controls the timing of verification sampling through its Work sequencing decisions.

Institutional Control Preparation Dependency: The Owner cannot prepare institutional control instruments until the Contractor completes as-built mapping and documentation deliverables identified in Part VII.

Cross-Contamination Control Obligation: The Contractor shall prevent uncontrolled migration or recontamination attributable to the Contractor's Work (see Part III, Exhibit C, Section C-9.3). Work sequencing decisions that create cross-contamination risk or require rework are the Contractor's responsibility. The Contractor's Technical Approach (Sections B.3(d)(2), B.3(d)(4), and B.3(d)(5) of Volume 1) shall describe the Contractor's proposed work sequencing logic and cross-contamination prevention strategy.

Section 13 – Health, Safety, and Cross-Contamination Controls

13.1 Site-Specific Health and Safety Plan

The Contractor shall prepare and implement a site-specific Health and Safety Plan (HASP) addressing PCB exposures and all other hazards associated with the Work, consistent with the Cleanup Plan Section 9 and applicable OSHA requirements. For areas where suspect or confirmed ACM or LBP may be disturbed, the HASP and associated JSAs shall incorporate the material identification and location information documented in the EWI Hazardous Building Materials Report dated November 2025 and shall identify the specific work controls, exposure controls, waste segregation measures, and regulatory notifications applicable to those co-located hazards.

The HASP shall include a Job Safety Analysis (JSA) for each primary task, including but not limited to coating removal, abrasive blasting, dry ice blasting, chemical stripping, concrete scarification, caulk and sealant removal, HVAC cleaning and replacement, waste handling, and decontamination. Each JSA shall identify task steps, hazards, controls, and stop-work criteria.

13.2 Engineering Controls

The Contractor shall implement engineering controls for dust generation, containment, and migration prevention. At a minimum, engineering controls shall include:

- Negative-pressure containments for intrusive work where dust generation is credible.
- Point-source capture with HEPA filtration.
- Sealing of HVAC openings and penetrations during adjacent intrusive work to maintain pressure control.
- Protection of occupied areas and new building systems from recontamination attributable to the Contractor's Work.

13.3 Administrative Controls

Administrative controls shall include work-area access limitations for trained personnel, adjacent tenant scheduling notices, signage and barrier plans, and coordination of hot-work and after-hours work to reduce occupant exposure.

13.4 Cross-Contamination Prevention

The Contractor shall implement cross-contamination prevention measures consistent with the Cleanup Plan Section 9.3, including:

- Staged dirty and clean zones with tool assignment by zone and change-out procedures.
- Daily supervisor walk-downs to verify compliance with containment, housekeeping, and equipment-use requirements.
- Corrective action for failed containment wipes at boundaries or in adjacent areas, including re-cleaning and documented cause analysis.
- Track-out controls at containment boundaries and building entry points.

13.5 Personal Protective Equipment and Exposure Monitoring

The Contractor shall implement personal protective equipment (PPE) requirements appropriate to the task and hazards identified in the HASP and JSAs. The Contractor shall implement exposure monitoring during intrusive work, including personal air monitoring where applicable, consistent with OSHA requirements and industry practice for PCB remediation in occupied buildings.

13.6 Multi-Hazard Coordination

Where asbestos-containing materials (ACM) or lead-based paint (LBP) are co-located with PCB-impacted materials, the Contractor shall implement controls required for those hazards without reducing TSCA compliance or compromising PCB waste segregation requirements. The Contractor's HASP shall address NESHAP compliance and multi-hazard coordination planning, including how work controls, waste segregation, and worker protection will be managed when multiple regulated materials are encountered concurrently.

13.7 Incident Response and Stop-Work Authority

The Contractor shall implement stop-work authority and incident response procedures. The HASP shall define stop-work criteria, corrective action protocols, and communication procedures with the Owner and the Owner's Environmental Consultant when a safety event or work control failure occurs. The Contractor shall document all incidents, corrective actions, and stop-work events in daily safety logs.

13.8 Documentation

The Contractor shall provide the following health and safety documentation as part of the Completion Documentation inputs required by Part VII:

- Site-specific Health and Safety Plan, including all task-specific JSAs.
- Training records for all personnel performing Work.
- Daily safety and containment logs.
- Incident logs and corrective action documentation.
- Exposure monitoring results.
- Copies of any asbestos or lead-related notifications, exposure monitoring records, clearance or closeout documentation, and waste shipment documentation generated for Work areas where ACM or LBP was disturbed in connection with the Work.

Section 14 – Greener Cleanup Implementation

14.1 Requirement

The Contractor shall implement practicable greener cleanup measures consistent with the Cleanup Plan Section 8 and EPA guidance on incorporating sustainable practices into site remediation. Greener cleanup measures are performance expectations, not alternative endpoints. The Cleanup Plan acceptance criteria and verification requirements in Part V are not modified by this Section.

14.2 Implementation Areas

The Contractor shall identify and implement practicable measures in the following areas, consistent with the Cleanup Plan:

1. **Energy and Resource Conservation:** Minimize energy consumption during cleanup activities through efficient equipment selection, idle-time management, and use of renewable energy sources where practicable.
2. **Air Quality and Emissions Control:** Minimize air emissions through effective containment, dust suppression, and equipment maintenance.
3. **Material and Waste Management Optimization:** Maximize waste diversion from landfill disposal where consistent with TSCA disposal requirements. Minimize generation of secondary waste streams.
4. **Water Conservation and Management:** Minimize water usage during cleaning and decontamination activities. Manage decontamination fluids to prevent uncontrolled discharge.
5. **Transportation and Logistics Optimization:** Minimize transportation miles through logistics planning, load consolidation, and use of local disposal facilities where permitted.

14.3 Performance Metrics and Reporting

Greener cleanup implementation shall be tracked through waste diversion rates, energy consumption documentation, transportation mile reduction, and air emissions reductions through containment effectiveness. The Contractor shall provide a Greener Cleanup performance metrics report as part of the Completion Documentation inputs required by Part VII.

Section 15 – Change Management and Field Change Documentation

15.1 Change Management Framework

Implementation of the Cleanup Plan shall follow the structured change management process established in Cleanup Plan Section 11.3. Adjustments to sequencing, work methods, or building areas shall remain consistent with the risk basis approved under 40 CFR §761.61(c).

15.2 Field Change Documentation

When unexpected conditions or practical constraints require adjustments to the approved Cleanup Plan, the Contractor shall promptly notify the Owner and Owner's Environmental Consultant of the condition in writing consistent with Section C-8. Field change notices or implementation memoranda documenting the authorized adjustment will be prepared by the Owner or the Owner's Environmental Consultant based on the Contractor's notification and any supporting field observations. The Contractor shall provide timely notification of unexpected conditions, field observations, and proposed adjustments. Each field change notice shall describe the change, the reason for it, the affected areas or materials, and how the change remains protective and consistent with the cleanup endpoints, verification strategy, and IC framework described in the Cleanup Plan.

15.3 Material Changes Requiring EPA Coordination

Changes that would expand or materially alter the scope of PCB cleanup in a way that could reduce protectiveness require coordination with EPA Region 7 before implementation. Material changes include, but are not limited to:

- Adding new building zones not described in the Cleanup Plan.
- Substantially reducing verification sampling density below the minimums established in Part V.
- Changing PCB waste classification or disposal routes beyond those anticipated in the Cleanup Plan and Part VI.

The Contractor shall not implement material changes without prior written authorization from the Owner. The Owner or the Owner's Environmental Consultant will coordinate with EPA on material changes.

15.4 Contractor Obligations

The Contractor shall:

- Notify the Owner and the Owner's Environmental Consultant promptly upon encountering unexpected conditions, including previously undocumented suspect materials, conditions inconsistent with the Cleanup Plan assumptions, or conditions requiring adjustment to planned work methods.
- Document unexpected conditions in field logs with photographs and descriptions sufficient to support field change documentation.
- Implement only those adjustments that have been authorized through the field change documentation process.

Retain all field change notices and supporting documentation for inclusion in the Completion Documentation package.

15.5 EPA Modification of Approval Conditions

If EPA Region 7 modifies, adds conditions to, or partially revokes its approval of the Cleanup Plan during the Contract period, the Owner or Owner's Environmental Consultant will notify the Contractor in writing of the modification and its implications for the Work.

EPA-directed modifications to the approval conditions constitute Owner-directed changes and shall be processed through the change management framework established in this Section 15. The Contractor shall comply with EPA-directed modifications upon written direction from the Owner. Cost and schedule impacts attributable to EPA-directed modifications shall be addressed through the Contract's change order provisions.

The Contractor shall not independently negotiate, discuss, or agree to modifications of approval conditions with EPA. All communications regarding approval modifications shall be conducted by the Owner or the Owner's Environmental Consultant consistent with Section C-5.

VOLUME 3 - REFERENCE DOCUMENTS

Volume 3 contains reference documents furnished with this RFP. Exhibit A contains the governing technical documents for the remediation Work and are incorporated by reference into the Contract Documents.

Exhibits B and C are provided for reference and implementation support and do not modify the Cleanup Plan or the requirements of Volume 2. In the event of conflict, the order of precedence in Attachment 3, Section M governs.

Exhibit A - EPA-Approved 40 CFR §761.61(c) Cleanup Plan (Governing Technical Document)

The following documents are provided as Exhibit A:

- Full Cleanup Plan (January 12, 2026), including all sections, tables, figures, and appendices
- EPA Approval Letter with Approval Conditions
- Draft Technical Attachment to Environmental Covenant (included with the Cleanup Plan submittal package)

Note: This Exhibit is the same technical exhibit package incorporated by reference in the Contract Documents (see Part III, Exhibit B). Within this Exhibit, the Cleanup Plan, including the EPA approval letter and any EPA approval conditions, remains the governing technical document for PCB remediation.



REGION 7

LENEXA, KS 66219

VIA EMAIL

Mr. Josh Ayers (jayers@stlpartnership.com)

Chief Financial Officer

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St. Louis, Missouri 63105

RE: Risk Based Cleanup and Disposal Application for the LCRA MET Center
6347 Plymouth Ave., St. Louis, MO 63133
EPA ID # MOR000508796

Dear Mr. Ayers:

The U.S. Environmental Protection Agency, Region 7, has completed a review of the above-referenced polychlorinated biphenyl (PCB, PCBs) cleanup and disposal application, submitted by Environmental Works, Inc. on your behalf, dated January 12, 2026, for the Metropolitan Education and Training (MET) Center in St. Louis, Missouri (Facility). The application was submitted in accordance with 40 C.F.R. § 761.61(c)(1) and 761.79(h).

Facility Status

The presently-operating MET Center occupies an approximately 95,000 square foot building consisting of a six-story office tower on the south and a vaulted ceiling warehouse used for training and as a diesel mechanic shop to the north. See Figure 1. This building is identified as the former Building #9 of the approximately 55-acre industrial complex occupied by Wagner Electric for the manufacturing of electrical transformers, motors, components, and brake linings between the early 1900s and 1982. Building #9 was specifically used for the manufacture, assembly, and storage of PCB electrical transformers. PCB waste was also stored in Building #9 during the demolition and remediation of other portions of the Wagner industrial complex.

Historic PCB detections of the concrete in the building ranged up to 94,800 parts per million (ppm) for Aroclor 1260. After limited remediation efforts were completed in 1984, known detections of 400 ppm PCBs remained in the flooring and are presently managed in place by a concrete cap. Cap design, monitoring, maintenance, occupancy or use restrictions, and institutional controls required by 40 C.F.R. § 761.61 were not implemented at the time of remediation. Sampling in 2025 confirmed the cap remains in place and did not detect any PCB migration into the cap materials. However, the cap does not extend to all contaminated flooring (47.4 ppm PCBs detected in concrete flooring outside the cap

in first floor office area). Current tenant occupancy (e.g., Missouri Division of Youth Services) and use of the building is consistent with “high occupancy use” and impacted building materials are broadly consistent with PCB remediation waste as defined in 40 C.F.R. § 761.3. The Facility is not under any other federal, state, or local regulatory oversight.

Regulatory Background

Pursuant to regulations promulgated under Section 6(e) of the Toxic Substances Control Act and codified in 40 C.F.R. § 761, the EPA requested information on the nature, location, and extent of PCB contamination at the Facility by letter dated on September 23, 2024. The Facility submitted an Indoor Air Sampling Work Plan on September 17, 2024, and amended the submittal on October 9, 2024. On November 12, 2024, EPA issued a conditional risk-based Approval for indoor air sampling and required the completion of building and materials characterization sampling in accordance with Subpart N of the PCB regulations found at 40 C.F.R. § 761.260–761.274. The Facility then submitted the PCB Sampling and Analysis Plan dated January 20, 2025, and amended that plan on January 22, 2025. On April 4, 2025, EPA issued an Approval Modification authorizing the proposed Building #9 materials assessment and PCB sampling work plan with conditions related to deadlines, remediation requirements, deed notices, and completion reporting. The sampling results were subsequently submitted by the Facility on July 22, 2025, and included detections in excess of cleanup values, including but not limited to concrete at 350 ppm PCBs in the High Bay (C-HB-2-2); caulk at 83 and 48 ppm in the Low Bay (CK-LB-1-1 and 2); and chipping paint in the Low Bay, High Bay, Diesel Shop, and North Tower with maximum detections of 860 ppm, 99 ppm, 140 ppm, and 2300 ppm, respectively. On August 13, 2025, the EPA approved enhanced cleaning of accessible surfaces in the Facility.

On December 18, 2025, the EPA issued a letter finding that broad PCB impacts in building materials at the Facility included floor tile, insulation, drywall ceiling, dust, and fluorescent lights. The EPA also determined that concrete pillars, concrete flooring, paint, caulk, and indoor air in multiple locations were contaminated with PCBs above the EPA’s industrial Regional Screening Levels and regulatory cleanup values under 40 C.F.R. § 761.61. The EPA advised occupancy restrictions, interim measures, and submission of a comprehensive remediation work plan. The work plan was submitted by the Facility on January 12, 2026, as part of the comprehensive cleanup and disposal application and is further summarized below.

Cleanup and Disposal Application

While a regulatory finding and determination is being made (see following sections), **other claims and statements in the report are outside the scope of this approval and will be addressed separately.** This includes the draft environmental covenant (referenced but not provided); Exhibit E, “Technical Attachment to Environmental Covenant”; and the “Operations and Maintenance Program” described in Section 10.0.

Nevertheless, the work plan provides details regarding decision logic, implementation criteria, and verification endpoints in Tables 3-1 (PCB Impact Categories and Decision Endpoints), 5-1 (Coating Removal and Encapsulation Decision), 6-1 (Implementation-Phase Characterization and Verification Checks), and 6-2 (Verification Plan Matrix, Density, Criteria, and Triggers), which are enclosed for reference. In pertinent part, the work plan proposes the following:

1. *Prior to high occupancy use, the following cleanup criteria must be verified:*

- a. Indoor Air (Total PCBs): $\leq 0.0215 \mu\text{g}/\text{m}^3$ ($21.5 \text{ ng}/\text{m}^3$; $2.15 \times 10^{-5} \text{ mg}/\text{m}^3$)
- b. Non-Porous Wipes (Total PCBs): $\leq 10 \mu\text{g}/100 \text{ cm}^2$
- c. Porous Bulk Materials (Total PCBs): $\leq 1 \text{ mg}/\text{kg}$ ($1 \text{ mg}/\text{kg}$)

2. *Removal of high-concentration PCB coatings (paints) and discrete porous materials:*

Coatings with $\geq 50 \text{ mg}/\text{kg}$ PCBs, PCB impacted caulks/sealants, as well as discrete porous materials impacted by historical PCB releases, will be removed from occupied zones, mechanically served zones, or where disturbance is planned. Generated debris will be managed as PCB remediation waste unless otherwise classified. Verification will be performed via nonporous wipe sampling and porous bulk sampling, with recleaning or retreatment required if criteria are exceeded.

3. *HVAC replacement, cleaning, and dust control:*

HVAC systems and reservoir surfaces identified as recontamination sources will be subject to HEPA vacuuming, wet cleaning, and replacement as necessary. New HVAC components will be protected from legacy contamination, and performance will be confirmed prior to turnover. Wipe verification and indoor air confirmation are required.

4. *Targeted concrete abatement or repair where localized PCB exceedances occur:*

Concrete with localized shallow impacts (up to $40 \text{ mg}/\text{kg}$ PCBs) in occupied or mechanically served zones will be removed or treated. Barrier-isolated impacts not subject to disturbance will be managed through engineered barriers and institutional controls (ICs). Post-abatement concrete cores in treated areas for verification.

5. *Institutional Controls (ICs) and Operations & Maintenance (O&M) for remaining PCB-impacted areas:*

Areas and materials not remediated to high-occupancy benchmarks will be managed under enforceable ICs and O&M program. All office areas intended for ongoing high-occupancy use will be cleaned and verified to project acceptance criteria prior to re-occupancy. Only the North Tower is proposed to remain above high-occupancy benchmarks and will be managed as a permanently restricted-use zone under ICs and O&M. The existing warehouse engineered barrier (cap) will be retained as an engineered control with inspection and repair obligations.

6. *Waste management:*

All PCB wastes generated during remediation including debris, removed coatings, caulks, concrete, dust, and equipment will be classified and managed in accordance with 40 C.F.R. § 761. PCB remediation waste and bulk product waste will be routed to appropriate TSCA-approved or Subtitle C/D RCRA facilities, with segregation, labeling, and documentation of disposal. Untested or newly-encountered materials suspected for PCB impacts will be conservatively managed as remediation waste unless clearly qualifying as bulk product waste. Additional details are provided in Table 7-1 of the work plan, but not enclosed here.

7. Reporting:

All remediation, verification, waste management, institutional controls, operations and maintenance will be documented in accordance with the work plan. Completion reports, verification data, waste manifests, inspection logs, and performance metrics will be submitted to the EPA for review and approval. Any changes to the approved scope or deviations from the work plan must be reported to the EPA prior to implementation.

EPA Finding and Conditions

The EPA hereby finds that the above-referenced work plan does not pose an unreasonable risk of injury to human health or the environment and approves the proposed work with the following conditions:

1. Any outstanding or unmet conditions required in the previous EPA Approvals cited in the “Regulatory Background” section of this Approval must still be demonstrably complied with. These may be addressed in the completion report required below.
2. Bulk PCB Remediation Waste as defined in 40 C.F.R. § 761.3 includes soils and sediments. Consistent with 40 C.F.R. § 761.61(a)(4)(i)(A) and 761.61(b)(1)(ii)(A), the cleanup level for bulk PCB remediation waste, such as soils and sediments at the facility, is ≤ 1 ppm PCBs.
 - a. Conceptual Site Model, Institutional Controls (including the draft covenant referenced in the work plan but not included), and Long-Term Operations and Maintenance Program and all associated sections/figures/tables must be updated to include facility soil, sediment, and sub-slab soil cleanup or final disposition.
 - b. The Long-Term Operations and Maintenance Program must also be amended to include ongoing monitoring to ensure continued long-term protectiveness of the controls. Such monitoring shall include annual wipe sampling of encapsulated surfaces and annual indoor air sampling in areas where previous detections exceeded industrial screening levels. Although the proposed sampling may demonstrate effectiveness at the time of installation, evaluating long-term protectiveness of engineering and institutional controls requires continued periodic sampling.
 - c. These sections must be amended and resubmitted for EPA approval within 6 months of the date of this Approval. This extended time frame for resubmittal is to allow for cleanup and remediation work to start in support of reuse of the facility. The EPA also acknowledges that while facility soils may not necessarily be remediated during the useful life of the building, their ultimate disposal and management would be required at the termination of use or demolition of the building. This must be reflected in any institutional controls and carried throughout the work plan as appropriate.
3. The “Residual Uncertainties and Planned Disposition” table referenced in the work plan must be provided to the EPA for review and approval as soon as practicable.
4. In accordance with 40 C.F.R. § 761.79(h)(5), the alternative risk-based decontamination as described in the subject work plan is approved.

- a. Any decontamination fluid (referred to as detergent in the subject work plan) that is not expressly listed as approved in 40 C.F.R. § 761.79(c)(3)(iv) must have a validation study completed in accordance with the self-implementing procedures found in 40 C.F.R. § 761, Subpart T. Specific conditions for the performance-based testing from this validation are determined in the validation study.
 - b. Any detergent used, and accompanying validation study information, must be reported in the completion report, supported by confirmation sampling, and Safety Data Sheets must be provided.
5. Building materials known or reasonably suspected to be impacted by PCBs must be disposed of in accordance with 40 C.F.R. § 761.61 once disturbed. This shall include materials disturbed for any purpose including but not limited to renovation, demolition, remediation, and during regular course of operation.
 - a. Removal of a porous surface contaminated with PCBs from its location or current use is prohibited except for removal for disposal in accordance with 40 C.F.R. § 761.61 or 761.79 for surfaces contaminated by spills, or 40 C.F.R. § 761.62 for manufactured porous surfaces.
6. A completion report shall be submitted to the Regional PCB Coordinator within 60 days of termination of activities subject to this approval.
 - a. The completion report shall minimally contain the following: executive summary of all activities, quantity of waste generated, copies of all shipping and disposal manifests, remediation waste profiles and all associated characterization sampling results, sampling designs, locations, as well as summary of equipment decontamination.
 - b. Any modifications to the proposed work plans shall be submitted as part of the completion report, or to the Regional PCB Coordinator as soon as practicable in cases of emergency.

If you have any questions or would like to set up a call to discuss any questions related to this Conditional Approval, please contact the Regional PCB Coordinator Annah Murray by phone at (913) 551-7895 or by email at murray.annah@epa.gov.

Sincerely,

DeAndré Singletary
Director
Land, Chemical & Redevelopment Division

Enclosure

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RISK-BASED CLEANUP AND DISPOSAL APPLICATION

**METROPOLITAN EDUCATION TRAINING CENTER
6347 PLYMOUTH AVENUE
WELLSTON, ST LOUIS COUNTY, MISSOURI**

Prepared For:

Land Clearance Redevelopment Authority
St. Louis, Missouri

Prepared By:

Environmental Works, Inc.
Kansas City, Missouri

EWI Project #252049.01

January 12, 2026

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1.0 INTRODUCTION

1.1 Executive Summary

This Risk-Based Cleanup and Disposal Plan (Plan) serves as the comprehensive remedial work plan and risk-based application requesting United States Environmental Protection Agency (EPA) approval under 40 CFR §761.61(c) for management of PCB-impacted building materials, dust, and indoor air at the MET Center in Wellston, Missouri. The MET Center consists of a multi-story office tower, a warehouse complex (High Bay, Low Bay, and Diesel Shop), and a separate North Tower structure. Current operations are limited to adult training and administrative functions within portions of the office tower. The warehouse bays are restricted to controlled access for maintenance and investigation activities only. The North Tower is not used and is proposed to remain permanently closed to occupancy, with access limited to inspections needed to maintain physical security and exterior coating integrity. This Plan focuses active cleanup on building materials and indoor environments in areas that are currently occupied or that are reasonably expected to be used for adult training and office functions. North Tower characterization data are used solely to support a closure-in-place and institutional control (IC) strategy for that structure and are not used to establish cleanup standards or remedy selection for other building areas.

PCB-impacted building materials at the facility are primarily the result of historical use, handling, and releases of PCB-containing transformer oils and associated residues in and around manufacturing, storage, and utility areas. Over subsequent decades, PCB-bearing oils and residues were transported on equipment, footwear, and air currents from these primary source areas into adjacent warehouse and office spaces, where they infiltrated porous materials and accumulated in dust on structural elements and HVAC components. Building-materials sampling in 2025 documented PCB impacts in painted and coated structural steel, mastics and expansion joints, select concrete floors and wall surfaces, and dust on top of ductwork, with impacts most pronounced in the High Bay, Low Bay, Diesel Shop, and North Tower and more limited occurrences in the occupied office tower. The Plan prioritizes removal or treatment of higher-concentration coatings and dust reservoirs, Heating, Ventilation, and Air Conditioning (HVAC) replacement and dust control, targeted concrete abatement, and ICs for any areas not remediated to high-occupancy benchmarks.

This Plan prioritizes: (1) removal of high-concentration PCB coatings and discrete porous materials; (2) HVAC replacement, cleaning, and dust control; (3) targeted concrete abatement or repair where localized PCB exceedances occur; and (4) ICs and operations and maintenance (O&M) for areas and materials that remain PCB-impacted but are not remediated to high-occupancy benchmarks. All office areas intended for ongoing high occupancy adult use will be cleaned and verified to project acceptance criteria prior to re-occupancy. Only the North Tower is proposed to remain above high-occupancy benchmarks and will be managed as a restricted-use zone under ICs and O&M. The existing warehouse engineered barrier (cap) will be retained as an engineered control with inspection and repair obligations.

The cleanup framework uses an adult worker exposure scenario that reflects current and reasonably anticipated future use of the MET Center. Project acceptance criteria are porous building materials verified to ≤ 1 mg/kg, non-porous surface wipes verified to ≤ 10 ug/100 cm², and indoor air verified to 21.5 ng/m³, all evaluated on a Total PCB basis. Decisions are made on Total PCBs per sample, calculated as the sum of detected Aroclors, and when more than one Aroclor is present the most conservative adult worker comparator is applied. The Plan is structured using EPA's PCB FAST Toolkit Tool 4 (TSCA Risk-Based PCB Cleanups Checklist) so that the conceptual site model, cleanup objectives, verification plan, waste-management approach, and long-term management commitments are presented in a format that supports efficient EPA review.

For building materials and wastes, this Plan distinguishes between PCB remediation waste and PCB bulk product waste in a manner that reflects the TSCA regulations. Building materials that are contaminated primarily by

historical releases and migration of PCB-containing oils (for example warehouse concrete, many coatings in the warehouse and North Tower, associated dust, and certain ceiling and insulation materials) are treated as PCB remediation waste. Materials that are known or reasonably assumed to have been manufactured as PCB-containing products (for example certain caulks, mastics, and legacy coatings) are treated as PCB bulk product waste when removed in discrete pieces with their attached substrates, consistent with EPA's 2012 bulk product reinterpretation, provided that contamination in those assemblies is not dominated by spill-driven oil intrusion. Where there is uncertainty, the Plan favors conservative management as remediation waste or management in place under ICs rather than relying on bulk product classification solely to reduce disposal cost.

1.2 Justification for Risk-Based Cleanup per 761.61(c)

Several aspects of the MET Center cleanup cannot be implemented solely under the self-implementing provisions of 40 CFR §761.61(a). The building is a large, partially occupied, multi-use facility with a mix of PCB remediation waste and PCB bulk product waste distributed across structural steel, masonry, concrete, and mechanical systems. The remedial strategy relies on tailored verification densities, sequencing that protects existing occupants and new HVAC and facade systems, and facility-specific engineering and administrative controls that extend beyond the default 40 CFR §761.61(a) framework.

Accordingly, this Plan is submitted under 40 CFR §761.61(c) as both the risk-based application and the comprehensive remedial work plan for PCB-impacted building materials and indoor environments at the MET Center. It is organized using EPA's PCB FAST Toolkit Tool 4: TSCA Risk-Based PCB Cleanups Checklist so that the conceptual site model, exposure scenarios, cleanup criteria, verification design, waste-classification logic, and long-term IC and O&M program can be evaluated in an integrated manner. Once approved, this Plan will govern implementation, verification, waste routing, and long-term management, with subsequent submittals (such as PCB Cleanup Completion Report and final Exhibits) prepared under this same framework.

1.3 Cleanup Standards, Verification, Waste Routing, and Approval Steps

Cleanup endpoints for this Plan are:

- Porous building materials (for example concrete, masonry, porous ceiling materials) verified by bulk sampling to ≤ 1 mg/kg Total PCBs in the treated zone.
- Non-porous surfaces (for example structural steel, finished concrete, mechanical housings that remain in service) verified by surface wipes to ≤ 10 ug/100 cm² Total PCBs.
- Indoor air in occupied or soon-to-be-occupied areas verified to 2.15 mg/m³ Total PCBs for high occupancy adult workers.

Verification will follow the framework presented in Section 6 and Table 6-2, including targeted high-contact wipes, randomized low-contact wipes, depth-discrete concrete coring in treated areas, and seasonal indoor-air confirmation with operational reporting-limit objectives at or below 1.0×10^{-5} mg/m³. All media decisions will be based on Total PCBs per sample, calculated as the sum of detected Aroclors, and when more than one Aroclor is present the most conservative adult worker comparator will be applied.

Materials characterization and clearance will reference 40 CFR §761 Subpart N where applicable for building-material groupings and statistical sufficiency. PCB wastes will be classified at the time of removal as PCB remediation waste, PCB bulk product waste, or PCB articles/liquids and routed to TSCA/RCRA Subtitle C or Subtitle D facilities, as appropriate, consistent with 40 CFR §761.60, 761.61, and 761.62 and EPA's current policy for PCB-impacted building materials. In general, materials impacted primarily by historic PCB-oil spills or migration are managed as remediation waste, whereas intact PCB-containing products that are removed with their attached substrates in discrete demolition pieces may be managed as bulk product waste under 40 CFR §761.62. For PCB

bulk product waste, routing to Subtitle D facilities will be used where allowed under 40 CFR §761.62(b)(1) or 761.62(b)(2) and where state and facility conditions are met. PCB remediation wastes will be routed to TSCA/RCRA Subtitle C facilities, unless an alternative risk-based management approach is specifically approved.

The Plan includes a concise “Residual Uncertainties and Planned Disposition” table to support discussion with EPA. Intrusive TSCA cleanup field activities under this Plan (including disturbance of suspect PCB-impacted materials, verification sampling, and waste shipment) will proceed only after EPA approval and any required TSCA notifications. Following completion of cleanup activities, the Owner will submit a PCB Cleanup Completion Report summarizing implementation, verification, and waste management within 30 days of field completion, and will implement O&M inspections and reporting for IC areas in accordance with Section 10.

1.4 Certifications

Upon EPA acceptance of this draft application, the Owner and the cleanup contractor will execute the certification required by 40 CFR §761.61(a)(3)(i)(E), confirming that sampling and analytical procedures are on file and available for inspection as described below:

I certify under penalty of law that this cleanup and disposal of PCB remediation waste will be conducted in accordance with the Toxic Substances Control Act (TSCA) and the PCB regulations at 40 CFR part 761, and that all sampling and analytical procedures have been documented and are on file at the facility and are available for inspection. I understand that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.” – 40 CFR §761.61(a)(3)(i)(E)

Any alternate analytical or extraction methods, if used, will be documented with Subpart-Q comparability and retained in project records.

2.0 SITE HISTORY AND CURRENT CONDITIONS

2.1 Purpose

The MET Center (formerly Wagner Electric Building 9) is approximately 95,000 square feet and includes a multi-story office tower, a warehouse complex (High Bay, Low Bay, and Diesel Shop), and a separate tower at the north end of the building referred to as the North Tower. Current operations are limited to adult training and administrative functions in portions of the office tower. The High Bay, Low Bay, Diesel Shop, and North Tower are restricted from routine access. The North Tower has not been occupied for decades, there are no plans for future occupancy or routine use, and it is proposed to remain permanently closed to occupancy under ICs, with only limited inspection access to maintain physical security and exterior condition.

The office tower consists of multiple floors with concrete slabs and pillars, structural steel framing, masonry walls, and mixed interior finishes, including painted concrete and masonry, gypsum board, suspended ceilings, flooring systems, and mechanical spaces. The warehouse bays are characterized by taller open volumes, exposed steel columns and beams, concrete floors (including historically capped areas), masonry walls, and limited ceiling systems. The North Tower contains legacy finishes and mechanical spaces that have not been modernized or reoccupied since the 1980s.

Office-tower areas and warehouse bays are served by separate HVAC systems and are separated by construction joints and fire doors. Under normal operations, the office tower is mechanically conditioned and generally maintains neutral to slightly positive pressure relative to adjacent spaces, while the warehouse bays experience more variable conditions associated with large door openings and stratified air volumes. These physical and mechanical separations, combined with administrative restrictions on access to the warehouse and North Tower, are important elements of the exposure-management framework for this Plan.

2.2 Previous Remedial Measures and Uncertainties

Historic capping and sealing of warehouse concrete floors reduced direct exposure potential but are not fully documented. In the mid-1980s, EPA-directed response actions included surfactant washing, mechanical scarification, vacuum recovery, onsite treatment of wash water, and steam cleaning of affected concrete surfaces, followed by installation of epoxy sealants and concrete capping in portions of the warehouse. These measures significantly reduced measured PCB concentrations at the time, but complete as-built records of cap thickness, lateral extent, and subsequent repairs are limited.

Targeted coring completed in 2025 was designed to evaluate current cap integrity and residual PCB distribution in the warehouse floors. Results indicate that capped warehouse floors are generally compliant with the porous-material cleanup target in the upper portion of the cap, and that PCB concentrations decrease with depth within the capped zones. The coring program also identified an apparently localized shallow exceedance in concrete outside the capped areas. These findings support a focused concrete removal, repair, or cleaning approach in discrete locations rather than broad demolition or wholesale cap removal.

The 2025 investigation further confirmed that earlier response actions focused primarily on floor surfaces. As reflected in the 2025 data and the conceptual site model, other building-material groups now function as long-term PCB sources and reservoirs, particularly in the warehouse and North Tower. The current Plan addresses these remaining sources through a combination of source removal, encapsulation where appropriate, verification sampling, and long-term IC/O&M, while preserving the protective function of the existing warehouse cap where current data demonstrate that it remains effective.

2.3 Regulatory Chronology

EPA regulatory engagement at the MET Center has been continuous from the initial CERCLA oversight of 1984 to 1989 through present. Key milestones include:

- **1984 to 1989:** CERCLA-administered PCB removal, epoxy sealing, and concrete capping in warehouse bays.
- **March 23, 2000:** EPA correspondence confirming floor capping, modifying use restrictions, and noting residual PCB contamination as primary driver for ICs.
- **September 23, 2024:** EPA Region 7 RFI letter requesting complete building characterization under TSCA.
- **October 29, 2024:** EPA site visit identifying multiple suspect PCB materials requiring characterization.
- **November 12, 2024:** Conditional Approval of indoor air sampling plan with requirement for building materials assessment.
- **January 2025:** Submission of integrated materials/air Sampling and Analysis Plan (SAP) under §761.61(c) by Environmental Works, Inc. (EWI).
- **February and May 2025:** SAP execution by EWI confirmed PCB impacts in legacy coatings, isolated concrete surfaces, sealants, and dust reservoirs; indoor air generally compliant with worker RSLs.

This chronology documents continuous federal oversight from 1984 through 1989 CERCLA response actions through the current TSCA §761.61(c) risk-based cleanup process and provides the regulatory framework within which this Plan is submitted and will be implemented.

2.4 Current Occupancy and Controls

The office tower is currently used for adult training and administrative functions by MET Center programs. Occupancy is limited to designated floors and suites of the office tower, where air detections were not in excess of EPA Indoor Worker RSLs, and is supported by ongoing housekeeping, access controls, and planned HVAC modernization. Enhanced housekeeping and routine building maintenance are in place in the occupied office tower areas to manage dust and maintain cleanable surfaces.

The High Bay, Low Bay, and Diesel Shop are restricted to controlled access (low occupancy) by trained personnel for maintenance, investigation, or planned remediation activities. The North Tower is not used for any occupancy or routine maintenance and is proposed to remain permanently closed to occupancy and routine access, with physical barriers and signage maintained to prevent entry. For the North Tower, this Plan relies on closure in place with ICs, rather than active remediation, and uses the characterization data from that structure only to support the closure-in-place and deed-restriction framework, not to set remedial action levels for other portions of the building.

The risk-based cleanup and verification activities in this Plan are focused on: (1) office tower spaces that are currently occupied or reasonably anticipated for future adult use; and (2) selected warehouse areas and connection points that must be accessed, modified, or traversed to support planned structural repair/renovation activities, including facade improvements, HVAC replacement, elevator modernization, high-bay structural repairs, and interior improvements. The existing access restrictions for the High Bay, Low Bay, Diesel Shop, and North Tower will remain in place during implementation.

Locations with PCB detections above applicable benchmarks are summarized in the EWI July 2025 PCB Sampling Report (see indoor air summary and building-material results tables) and are the basis for the managed-area and access-control approach described in Sections 6 through 10. A copy of the July PCB Sampling Report is provided in Appendix A.

The North Tower has not been occupied for decades, there are no plans for it to be occupied or placed back into active use, and it will remain a closed, non-occupiable structure managed under ICs. The Plan anticipates that North Tower conditions will be addressed through continued physical separation from occupied spaces, long-term access restrictions, and, as appropriate, deed restrictions or similar ICs consistent with 40 CFR §761.61(a)(7)-(8). Sampling and characterization results for the North Tower are used to define its containment and institutional control requirements and are not intended to drive cleanup standards or remedial decisions for other areas of the building.

3.0 NATURE AND EXTENT OF PCB IMPACTS

3.1 Building Configuration and Ventilation Context

The office tower and warehouse spaces are separated by construction joints, fire doors, and differing HVAC systems, which reduces air and dust exchange. The warehouse has tall open volumes with stratification and intermittent make-up air from large doors; these conditions create the potential for concentration of particulates on elevated ledges, truss chords, and HVAC duct tops, followed by redistribution with seasonal pressure changes.

The office tower is mechanically conditioned and generally maintains neutral to slightly positive pressure relative to adjacent spaces; vestibules and closed fire doors reduce cross-migration during normal operations.

Mechanical closets and return plenums are potential collection points for fine dust and will be prioritized for cleaning and verification before re-occupancy. Stairwells and handrails are high-contact features; verification wipe criteria will be applied there with appropriate sample densities to reflect elevated contact frequency.

3.2 Materials and Surface Types Influencing Method Selection

Substrate composition and surface condition control both the practical methods for PCB removal and the selection of verification metrics under this Plan. Building materials at the MET Center fall into three primary functional categories for purposes of sampling, cleanup, and data evaluation:

1. Porous Structural Materials:
These include cast-in-place and precast concrete floors, concrete columns, concrete ceilings, masonry walls, brick, and concrete block. PCBs are present in these materials where historical transformer oil releases, oiling of equipment locations, and airborne dust deposition have penetrated into the concrete paste or porous masonry surfaces. For these materials, the cleanup objective is expressed as Total PCBs in bulk solids and verified by depth-discrete concrete or masonry cores.
2. Non-Porous and Low-Porosity Surfaces:
These include structural steel, painted metal components, sealed glazing, handrails, guardrails, and other essentially non-absorptive surfaces. PCB residues on these materials are present predominantly as surface films, paint systems, and fine dust. For these surfaces, the cleanup objective is expressed as Total PCBs in surface wipes and verified by wipe sampling on defined areas.
3. Manufactured PCB Building Products:
These include pre-1979 PCB-containing caulks and sealants, glazing compounds, floor tile and associated mastics, and related manufactured building products used in original construction or historical renovation. Where these materials are removed during work under this Plan, they will generally be evaluated and managed as PCB bulk product waste, with the potential for attached substrate pieces to be included in the bulk product waste stream where the PCB product remains adhered at the time of removal and is the primary source of PCBs in that assembly.

In addition, dust reservoirs and HVAC components (duct tops, plenums, coils, filters, and mechanical closet surfaces) are treated as potential secondary reservoirs that can redistribute PCB-bearing dust. These components are evaluated and verified primarily by wipe sampling and indoor air measurements.

Sub-slab soils and barrier-isolated sources are treated in the CSM as potential PCB-impacted media in historically oiled or dust-impacted areas. This Plan addresses potential sub-slab impacts through maintenance of engineered barriers (building slabs and the historic warehouse cap), strict intrusive-work controls for penetrations, coring, slab

removal, or excavation below slab, and indoor air performance confirmation in receptor zones. Routine sub-slab soil sampling is not part of the baseline remedy framework. Targeted characterization is implemented only when intrusive work triggers the pathway or when needed for proper management of generated spoils.

Exterior building materials and facade-related dust and debris are treated in the CSM as potential sources and pathways for release and recontamination. This Plan addresses exterior pathway uncertainty through containment, sequencing, housekeeping, and verification controls during exterior work to prevent migration of exterior dust into occupied or air-distribution zones. Exterior work does not establish new building-wide cleanup endpoints by itself unless a documented migration pathway to receptor zones is identified.

This materials-based framework aligns with EPA’s PCB FAST Toolkit (Tool 4) expectations for characterizing PCB-impacted building materials and dust, by explicitly distinguishing porous versus non-porous substrates, manufactured PCB products versus contaminated building materials, and the associated decision metrics (bulk concentration versus wipe criteria). It provides the basis for the sampling and verification strategy described in Section 6.0 and Tables 6-1 and 6-2.

Table 3-1 summarizes impact categories, typical concentration ranges, and the corresponding response actions and verification endpoints for each material class identified at the MET Center. These groupings and endpoints reflect the building-material source characterization and decision-framework expectations in FAST Tool 4 and provide the bridge between existing data, proposed additional characterization, and the cleanup and verification program in Sections 5 and 6.

Table 3-1. PCB Impact Categories and Decision Endpoints

Category	Typical Range	Decision Endpoint	Verification
High-Concentration Coatings (≥ 50 mg/kg)	50 to 860 mg/kg Total PCBs (Aroclor 1254/1260 detections in paints and coatings)	Remove coating where present in occupied zones, mechanically served zones, or where disturbance is planned. Where removal exposes or impacts porous substrates, treat the affected zone to meet porous criteria. Manage generated debris as PCB remediation waste unless a separate waste definition applies.	Non-porous wipe verification ≤ 10 $\mu\text{g}/100$ cm^2 . Porous bulk verification (where treated) ≤ 1 mg/kg. Re-clean or re-treat and re-verify if criteria are exceeded.
Moderate-Concentration Coatings (10 to <50 mg/kg)	10 to 49 mg/kg Total PCBs	Clean and encapsulate where coating is intact and low-wear, and where encapsulation is consistent with the exposure model. Remove coating where high-touch, high-wear, or disturbance is expected, or where verification cannot be met.	Wipe verification on representative non-porous contact surfaces ≤ 10 $\mu\text{g}/100$ cm^2 . Encapsulation requires adhesion and condition checks and is subject to O&M inspection and repair triggers.
Low-Concentration Coatings (<10 mg/kg)	1 to 9 mg/kg Total PCBs	Detergent clean and manage with housekeeping and engineered controls. Escalate to encapsulation or removal only if verification fails or if conditions change (for example, new occupancy or disturbance).	Wipe verification where applicable ≤ 10 $\mu\text{g}/100$ cm^2 . If verification is inconclusive due to reporting limits, adjust sampling or analytical approach per Section 6.4.2.

Category	Typical Range	Decision Endpoint	Verification
Sealants, Mastics, and Caulks (Potential PCB Bulk Product Materials)	1 to 83 mg/kg Total PCBs (one location >50 mg/kg)	Where removed, manage as PCB bulk product waste when the material remains adhered to substrate at the time of removal. Do not separate product from substrate solely to change waste classification. If the bulk product has been removed and residual substrate remains contaminated, manage that substrate as PCB remediation waste.	Adjacent non-porous surfaces and work areas verified by wipes $\leq 10 \mu\text{g}/100 \text{ cm}^2$ as needed for turnover. Dust control and containment to prevent recontamination.
Concrete (Localized Shallow Impacts)	<1 to 40 mg/kg Total PCBs (depth-discrete results; localized anomalies)	Where in occupied or mechanically served zones, or where disturbance is planned, remove or treat the impacted interval. Where impacts are barrier-isolated and not disturbed, manage through barriers and ICs consistent with this Plan.	Post-abatement concrete cores in treated zones $\leq 1 \text{ mg/kg}$. Adjacent non-porous surfaces verified by wipes $\leq 10 \mu\text{g}/100 \text{ cm}^2$.
HVAC Dust and Reservoir Surfaces	Wipes 12.8 to 21.6 $\mu\text{g}/100 \text{ cm}^2$ on overhead duct tops and reservoir surfaces (pre-cleaning)	Treat HVAC interiors and reservoir surfaces as a recontamination source. Implement HEPA vacuuming and wet cleaning, protect new HVAC components from recontamination, and confirm performance prior to turnover.	HVAC interior and reservoir wipes $\leq 10 \mu\text{g}/100 \text{ cm}^2$. Indoor air confirmation in applicable zones $\leq 0.0215 \mu\text{g}/\text{m}^3$ (21.5 ng/m^3 ; $2.15 \times 10^{-5} \text{ mg}/\text{m}^3$) Total PCBs for adult workers.

Note:

North Tower data are not included in Table 3-1 decision ranges or used to set building-wide endpoints. The North Tower is managed as a permanently closed, non-occupiable area under ICs.

3.3 North Tower Characterization and Management Approach

The North Tower is a structurally distinct portion of the MET Center complex with legacy interior finishes, mechanical spaces, and coatings that have not been modernized or re-occupied since historical manufacturing operations ceased. The 2025 Sampling and Analysis Plan and subsequent PCB Sampling and Analysis Report documented frequent PCB exceedances in legacy coatings and selected building materials within the North Tower, generally consistent with the building-wide pattern of historical oiling and airborne deposition but at concentrations and areal coverage that would require extensive demolition and reconstruction to reduce to high-occupancy benchmarks.

The North Tower is not mechanically connected to the actively occupied office tower HVAC systems and is physically separable for purposes of access control and ICs. Building configuration, sealed doors, and administrative restrictions currently prevent routine access, and no adult training or office use is planned for the North Tower.

In light of these conditions, LCRA and EPA Region 7 have discussed and agreed in principle that the North Tower will be managed as a permanently closed, non-occupiable zone under ICs, with no active remediation under this Plan. The North Tower characterization data are used to confirm that closure-in-place with physical isolation and periodic exterior inspection is protective for current and reasonably anticipated future uses, given the absence of receptors inside the North Tower. Those data are not used to set cleanup endpoints or remedy selection for other

building areas, which are evaluated based on the building-materials, dust, and indoor-air results in currently occupied or planned-for-use spaces.

Any future proposal to modify, demolish, or repurpose the North Tower would require a separate TSCA evaluation and, as appropriate, a new or amended 40 CFR §761.61(c) submittal. That potential future evaluation is outside the scope of this Plan.

3.4 HVAC Systems - Existing Configuration and Condition

The building is served by seven rooftop units (RTUs), four on the Low Bay roof and three on the office tower roof. Multiple split systems with four air-handling units (AHUs) are on mezzanines in the High Bay technical training area, and approximately 15 gas-fired radiant unit heaters that provide High Bay heat in winter. The RTUs provide direct-expansion (DX) cooling and gas heat; the mezzanine AHUs reject heat to condensers on the Low Bay roof. Much of this equipment is at end of useful life and operates with stand-alone thermostats and interlocks without a Building Automation System (BAS) or Direct Digital Control (DDC), which limits the ability to hold stable pressure relationships or run programmed purge cycles.

In the High Bay, legacy summer ventilation relied on dedicated supply fans and roof exhaust; several of these fans are inoperable or disconnected, and exhaust is intermittent. The combination of aged equipment, disconnected fans, and limited controls increases the likelihood of dust reservoirs in return plenums, duct interiors, coil housings, and on horizontal duct tops. Those reservoirs can re-entrain when doors are opened, pressure reversals occur, or equipment cycles on.

The Low Bay, High Bay and Diesel Shop systems are dedicated and do not interconnect with the occupied office tower systems, reducing cross-transfer risk as long as those zones remain secured until remediation is complete. HVAC work described in this Plan is sequenced with source removal and control so new equipment does not inherit legacy contamination, and seasonal indoor-air confirmation is performed under typical operating modes after each phase.

4.0 RISK EVALUATION AND DECISION LOGIC

4.1 Conceptual Site Model

The Conceptual Site Model (CSM) integrates known and reasonably suspected PCB sources, affected media, transport mechanisms, exposure pathways, and receptors to support the remedy selection, verification program, waste management framework, and ICs in Sections 5 through 10. The CSM is grounded in the July 2025 sampling report and EPA's December 18, 2025 direction that the facility has PCB remediation waste present in multiple building areas and that known or suspected contamination must be addressed in a facility-wide work plan, including sub-slab soils and exterior building materials.

Building Zones and Use Assumptions. For CSM purposes, the facility is organized into four functional zones with distinct receptor assumptions:

1. Office Tower Occupied Zone (High Occupancy).
Adult office staff, instructors, and adult trainees occupy designated office and training spaces on a routine schedule. These spaces are the primary receptor zones driving performance criteria and verification.
2. Warehouse Areas (Restricted, Low Occupancy Until Demonstrably Achieving High Occupancy Criteria).
The High Bay, Low Bay, and Diesel Shop are treated as controlled-access zones. EPA has directed that, at a minimum, areas with indoor-air detections above EPA Indoor Worker RSLs (including the Low Bay and Diesel Shop) be restricted to low occupancy as defined in 40 CFR §761.3, until high occupancy cleanup levels under 40 CFR §761.61 have been demonstrably achieved with confirmation sampling.
3. Exterior Envelope and Facade Work Zone (Intermittent Worker Exposure).
Exterior building materials and building-envelope components are treated as potential sources and pathways during renovation, maintenance, and remediation activities. The CSM explicitly includes exterior building materials as a pathway concern that must be controlled during implementation to prevent off-site releases and to prevent recontamination of indoor spaces.
4. North Tower Closed Management Area (No Receptor Zone).
The North Tower is treated as a permanently closed structural volume with no routine receptors. It is managed by physical barriers and recorded land-use controls. North Tower data are used to define closure-in-place requirements and long-term inspection and maintenance obligations for that structure only and are not used to set cleanup endpoints or remedies for other zones.

Sub-Slab Soils and Historic Floor Contamination. Based on facility history and EPA direction, sub-slab soils are treated as known or suspected PCB-impacted media in localized areas associated with historic use and releases. This Plan does not propose new sub-slab soil sampling as part of the remedy. Instead, the existing building slab and the historic warehouse cap function as engineered barriers. The performance of these barriers is confirmed through indoor-air and surface verification in receptor zones, together with barrier inspection and maintenance requirements and strict controls on penetrations and intrusive work. Any future intrusive work that could disturb the slab, cap, or underlying materials is managed through the change-management and EPA coordination framework.

CSM Graphics. Figure 4-1a (Conceptual Site Model - Current Conditions) and Figure 4-1b (CSM - Managed Conditions (Post-Remedy + IC/O&M)) depict the dominant source-to-receptor linkages and show how the selected remedy elements, verification, and ICs break those pathways for each zone as described below:

- Figure 4-1a depicts PCB sources in building materials, dust reservoirs, HVAC components, and known or suspected sub-slab sources, with pathways to occupied office and training areas and to restricted zones.
- Figure 4-1b depicts the post-remedy condition in which primary pathways to occupied zones are broken by source treatment, encapsulation where allowed, housekeeping, HVAC replacement and commissioning controls, and enforceable restricted-zone controls and O&M.

Figure 4-1a. Conceptual Site Model - Current Conditions

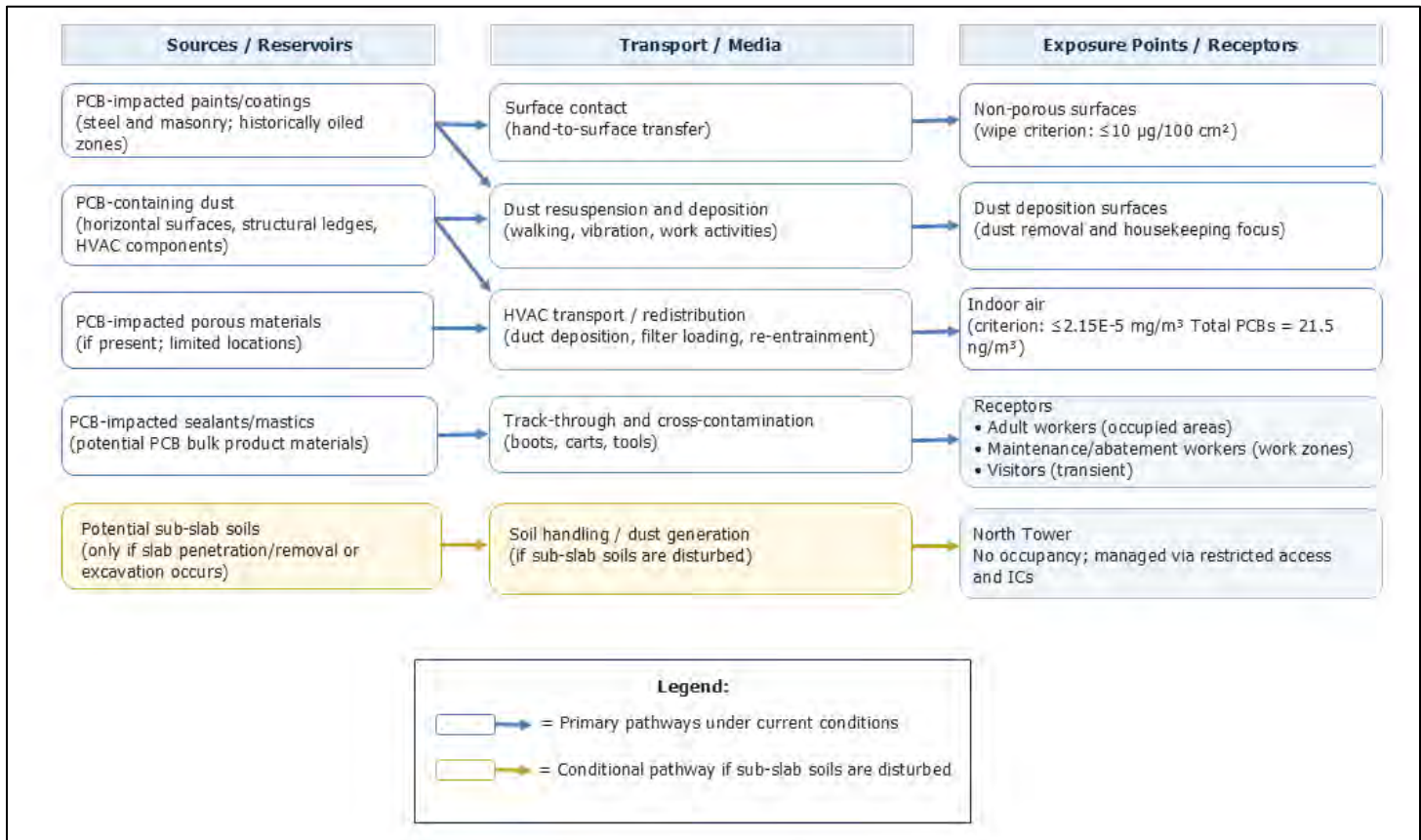
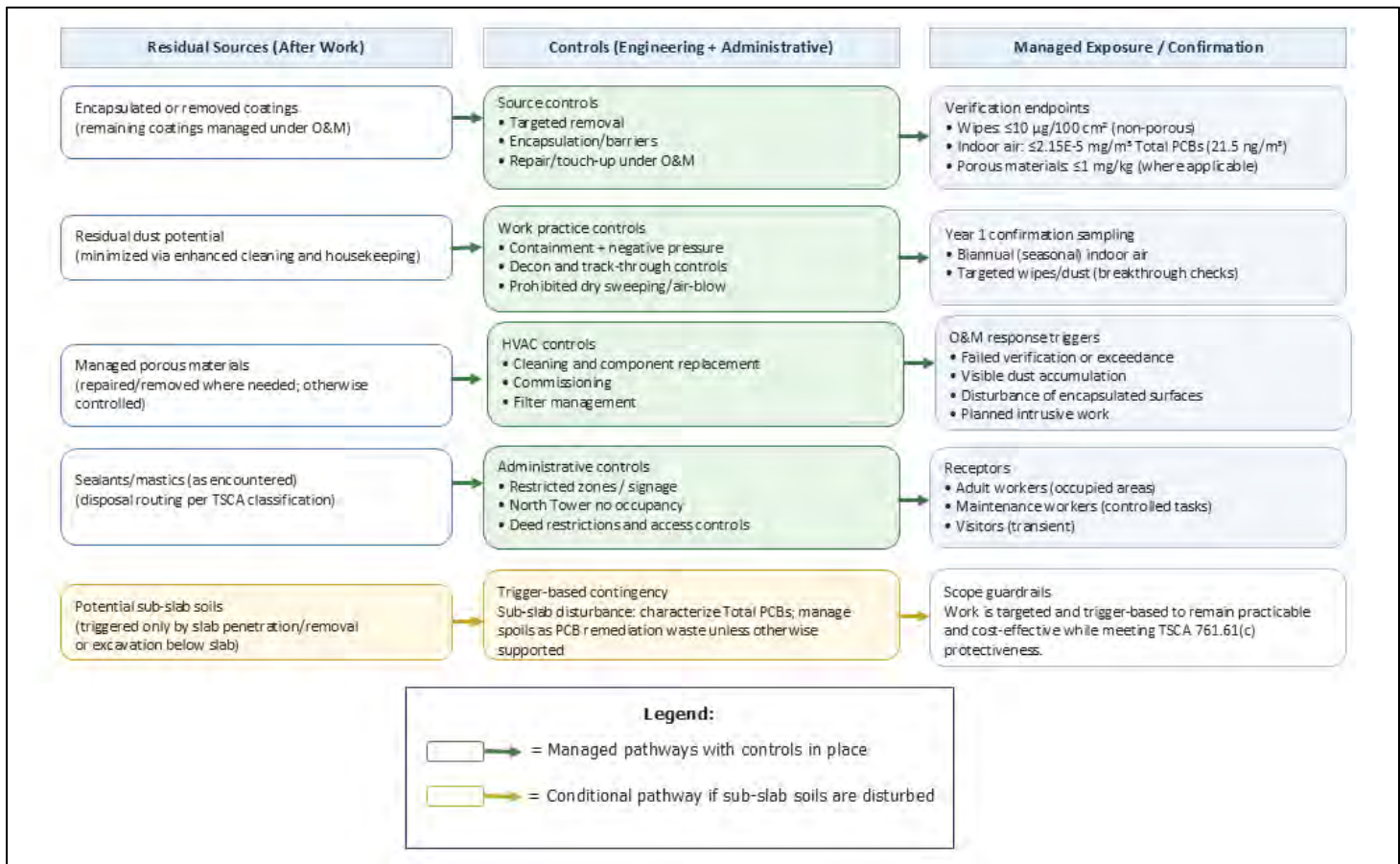


Figure 4-1b. Conceptual Site Model (CSM) - Managed Conditions (Post-Remedy + IC/O&M)

4.1.1 Sources and Media

PCB sources and impacted media at the facility are grouped into distinct categories for decision-making and control:

1. PCB-Impacted building materials and associated contaminated substrates (primary sources).
The July 2025 investigation identified PCB impacts in multiple building materials, including paints/coatings, caulk/sealant materials, concrete and masonry, floor materials, insulation, drywall/ceiling materials, and dust. For purposes of remedy implementation and disturbance, these materials are treated consistently with EPA's direction that building materials known or reasonably suspected to be impacted by PCBs are to be managed under 40 CFR §761.61 once disturbed. Where a material is a manufactured PCB product as defined by TSCA and remains attached to substrate at the time of removal, it is managed under the applicable TSCA disposal framework. The work plan does not assume that all coated or adjacent substrates are PCB products as manufactured; rather, it recognizes that certain impacted coatings and substrates at this facility reflect historical releases, oiling, and deposition and therefore are to be handled as PCB remediation waste when disturbed.
2. Settled dust and surface films (secondary sources).
Settled dust reservoirs on elevated ledges, ductwork and other horizontal equipment surfaces are treated as secondary reservoirs that can transfer PCBs to high-touch surfaces and contribute to indoor-air concentrations through re-entrainment. These reservoirs are a principal cross-media linkage between impacted building materials and receptor zones and will be controlled to protect from recontamination of new HVAC components and cleaned areas.

3. Known or suspected sub-slab and capped floor sources (barrier-isolated sources).
Historic floor contamination beneath the warehouse cap and known or suspected sub-slab contamination are treated as barrier-isolated sources. These sources are not addressed by intrusive removal under this Plan. They are managed through maintaining the slab and cap as engineered barriers, controlling penetrations and intrusive work, and confirming performance through indoor-air and surface verification in receptor zones.
4. Exterior building materials.
Exterior building materials, including facade-related coatings and sealants and other envelope elements, are included as potential sources during renovation and maintenance activities. These exterior sources can present direct worker exposure pathways during facade work and can create indirect pathways to indoor receptor zones if the building envelope is compromised or if dust is transported indoors.

4.1.2 Transport and Exposure Pathways

The primary mechanisms linking sources to media and receptors at the facility include:

1. Volatilization to indoor air.
PCBs can volatilize from impacted building materials and dust reservoirs into indoor air, particularly in enclosed spaces or where airflow patterns move air from restricted zones into adjacent occupied zones.
2. Dust generation, transfer, and re-entrainment.
Wear, flaking, maintenance activity, vibration, and airflow can mobilize dust from impacted surfaces and reservoirs, potentially leading to transfer to high-touch surfaces and re-entrainment into indoor air.
3. Direct contact with impacted surfaces during work activities.
Maintenance, renovation, and remediation work can create direct dermal contact pathways and can generate debris, chips, and dust requiring strict containment, decontamination, and waste handling.
4. Exterior disturbance and envelope pathways.
Disturbance of certain exterior materials during facade work can generate PCB-bearing dust and debris. If building envelope integrity is not maintained, exterior dust may potentially migrate indoors through openings, penetrations, or temporary negative pressure conditions, creating recontamination risks.
5. Barrier breach or penetration pathways from sub-slab sources. Where sub-slab sources exist, the intact building slab and warehouse flooring concrete cap limit exposure. Potential pathways arise primarily from penetrations, cracks, utility work, coring, or other intrusive activities. The Plan manages these pathways through barrier integrity requirements, penetration controls, and reliance on indoor-air confirmation as the performance indicator for barrier effectiveness in receptor zones.

4.1.3 Receptors and Exposure Scenarios

The CSM uses adult receptors and distinguishes exposure scenarios by zone:

- High Occupancy Receptors (Office Tower Occupied Zone).
- Adult office staff, instructors, and administrative personnel in designated office-tower spaces.
- Adult trainees participating in training programs conducted in office-tower classrooms and other spaces approved for high-occupancy use following cleanup and verification.
- Low Occupancy and Controlled-Access Receptors (Restricted Warehouse Zones).
- Adult maintenance staff and adult construction or remediation workers who access warehouse bays, the Low Bay, and Diesel Shop under controlled conditions.

Consistent with EPA direction, areas with indoor-air detections above EPA Indoor Worker RSLs are treated as low-occupancy zones until the Plan's high-occupancy criteria have been demonstrably achieved with confirmation sampling. "Low occupancy" is applied consistent with 40 CFR §761.3 and is enforced through restricted access, administrative controls, and work practices.

- **Exterior Work Receptors:**
Adult construction, maintenance, and remediation personnel performing facade and envelope work. Exposures are controlled through containment, debris management, decontamination, and perimeter controls that prevent releases and prevent indoor recontamination.
- **North Tower:**
The North Tower is not a receptor zone in this CSM. It is managed as a closed area with no routine occupancy. Any future proposal for intrusive work or changes to that status is addressed through EPA coordination and a separate evaluation framework, rather than by expanding the current remedy standards to other building zones.

4.1.4 Chemicals of Concern and Risk Benchmarks

The chemical of concern for this application is Total PCBs, evaluated as the sum of all detected Aroclors in a sample for each medium (bulk solids, wipes, and indoor air). Total PCBs is the decision metric applied throughout the remedy and verification framework.

- **Regulatory and Risk Benchmarks Used in Decision Logic:**
TSCA PCB remediation waste cleanup framework: The Plan is developed to meet the requirements and performance expectations of 40 CFR §761.61 for impacted building materials and contaminated media that are disturbed or managed as part of this facility-wide action.
- **High occupancy and low occupancy use conditions:**
EPA has directed that building use and occupancy be restricted to low occupancy use in areas where indoor-air detections exceed EPA Indoor Worker RSLs, and that the building may return to unrestricted use when high occupancy cleanup levels required under 40 CFR §761.61(a)(4)(i)(A) have been demonstrably achieved with confirmation sampling consistent with 40 CFR §761.61(a)(6).
- **RSL decision points:**
Where EPA RSLs are used as decision points, the Plan applies EPA's direction that applicable RSLs use a target hazard quotient of 0.1 and target cancer risk of 1E-06, and that comparisons are made using Total PCBs (sum of Aroclors) rather than individual Aroclors.
- **Performance Criteria for Verification (Applied in Occupied and Mechanically Served Areas):**
The Plan's verification framework uses the acceptance criteria presented in Section 6.2 for porous materials, non-porous wipe surfaces, and indoor air. These criteria are used to confirm that source-to-receptor pathways to high-occupancy zones have been broken and that new or cleaned HVAC components are protected from recontamination.

4.1.5 Uncertainties and Data Management

The January 2025 PCB Sampling and Analysis Plan (SAP), as conditionally approved by EPA on April 4, 2025, provides the primary data foundation for this Plan. EPA has not required additional site-wide characterization as a condition of moving forward with a facility-wide remediation work plan. Residual uncertainties are managed through the following:

1. Conservative pathway controls

2. Verification and confirmation sampling tied to occupancy and zone turnover
3. Enforceable restricted-zone and barrier integrity requirements, and
4. A long-term O&M framework.

Within that framework:

- A. Seasonal variability and indoor air performance confirmation.
Indoor-air verification is treated as the principal performance confirmation that caps, barriers, source controls, and HVAC controls are effective in receptor zones. Where EPA requests additional confirmation, or where initial post-remedy results indicate seasonal effects, the Owner will conduct additional focused indoor-air confirmation consistent with the verification framework.
- B. Sub-slab soils and barrier-isolated sources. Known or suspected sub-slab sources are addressed in this Plan through barrier management and indoor-air confirmation, not by new sub-slab soil sampling. The slab and warehouse cap remain the engineered barriers. Penetrations, coring, or intrusive work that could compromise these barriers are managed through strict work controls and the change-management and EPA coordination process.
- C. Exterior pathway uncertainties. Exterior work is treated as a potential pathway for release and recontamination. The Plan manages this uncertainty through containment and work sequencing tied to facade scope, with verification and housekeeping requirements that prevent migration of exterior dust into occupied zones.
- D. North Tower. The North Tower remains a managed closure-in-place area. Data from that structure are used to define inspection and maintenance obligations and to support ICs for that structure only.

4.1.6 Conceptual Site Model Summary Tables

Tables 4-1A and 4-1B summarize the CSM for this Plan in a format intended to support implementation and EPA review. Table 4-1A identifies the primary PCB-impacted media, exposure pathways, receptors, and the existing and planned controls that manage those pathways.

Table 4-1B provides a crosswalk from each key CSM element to the Plan sections that implement the corresponding controls, verification, and long-term management requirements. These tables are intended to clarify how the performance-based remedy, verification approach, and ICs work together to support turnover decisions and long-term protectiveness.

Table 4-1A. - Conceptual Site Model Summary Matrix

Source or Location	Medium	Primary Pathways	Primary Receptors	Existing Controls	Proposed Controls and Cleanup Endpoint
PCB-impacted coatings and adjacent substrates in occupied office-tower areas and mechanically served zones	Coatings on steel, masonry, and concrete; adjacent surfaces and dust	Disturbance during renovation, dust entrainment, contact transfer, and HVAC transport	Adult workers and future adult occupants in areas served by HVAC	Separate HVAC between office tower and warehouse; limited current occupancy; fire doors and physical separations	Remove or treat sources driving exposure, confirm wipe and porous criteria per Section 6.2, and confirm indoor air performance in turnover areas.
PCB-impacted coatings, porous surfaces, and dust reservoirs in warehouse bays and other restricted areas	Coatings and dust on steel, masonry, and concrete; overhead reservoirs	Re-entrainment during intrusive work, maintenance access, or barrier breach	Construction workers and maintenance staff during controlled activities	Restricted access and limited occupancy; existing barriers and housekeeping practices	Maintain restricted-zone controls, implement enhanced housekeeping during work, and apply verification per Section 6.2 for any turnover or change in use.
Legacy caulk, sealants, mastics, and expansion joints (interior and exterior)	Manufactured sealant products; adjacent substrates where disturbed	Disturbance and debris generation; localized dust migration to receptor zones	Construction workers; adult occupants if in served zones	Work sequencing and containment practices during renovation	Manage removed adhered sealants as PCB bulk product waste under 40 CFR §761.62 when applicable; verify adjacent surfaces and control dust to prevent recontamination; route waste per Section 7.
Localized concrete impacts (including uncapped floor areas and shallow anomalies)	Porous concrete (cores and shallow interval impacts)	Disturbance during demolition or repair; contact and dust generation	Construction and maintenance workers; adult occupants in turnover zones	Existing cap or barrier in capped areas; restricted access where applicable	Remove or treat impacted intervals where required to meet porous criteria; manage barrier-isolated sources in place; confirm indoor air performance in receptor zones as applicable.
Settled dust on ductwork, ledges, and equipment reservoir surfaces	Dust films and adhered particulates on overhead and HVAC surfaces	Re-entrainment and HVAC transport; contact transfer during maintenance	Construction workers and adult occupants in served zones	Separate HVAC systems and restricted access in non-occupied areas	HEPA vacuuming and wet cleaning; verification wipes per Section 6.2; ongoing housekeeping, inspection, and corrective action triggers per Section 10.

Source or Location	Medium	Primary Pathways	Primary Receptors	Existing Controls	Proposed Controls and Cleanup Endpoint
Known or suspected sub-slab sources beneath slab or cap (barrier-isolated sources)	Soils beneath slab or cap; potential vapor or particulate pathway if barrier is breached	Barrier breach during intrusive work; migration through penetrations	Construction workers during intrusive work; adult occupants only if pathway is created	Existing caps, slabs, and barriers; controlled access to restricted areas	Address through barrier integrity, change-management triggers, and EPA coordination for intrusive work; implement protective controls and confirm performance in receptor zones rather than routine new soil sampling.
Exterior building materials and facade work zones	Exterior coatings, dust, and demolition debris	Generation and migration of exterior dust into occupied zones; track-in and resuspension	Construction workers; adult occupants if recontamination occurs	Work area controls and building separations	Apply containment, negative pressure where needed, housekeeping, and verification to prevent indoor recontamination; manage waste streams consistent with Section 7.
North Tower (closed)	Closed building area	No routine pathway (sealed and physically isolated from occupied areas)	None for routine use; construction workers only under a controlled future scope	Managed closure-in-place; physical sealing and planned ICs	Maintain closure and barrier integrity under ICs; data support North Tower stewardship only and do not set cleanup endpoints for other building areas; any future intrusive work subject to EPA coordination.

Table 4-1B. - Conceptual Site Model Crosswalk to Plan Sections

CSM Element or Pathway	Plan Sections That Implement Controls and Verification
PCB-impacted paints and coatings (steel, masonry, concrete)	Remedy selection and work controls: Sections 5 and 6. Verification criteria and decision rules: Section 6.2 through Section 6.4. Long-term management and corrective action triggers: Section 10.
PCB-containing dust (horizontal surfaces, ledges, HVAC components)	Housekeeping and cleaning requirements: Sections 5 and 10. Verification wipes and indoor air confirmation: Section 6.2 and Section 6.3. Inspection schedule and response triggers: Section 10.
HVAC transport and redistribution (duct deposition, filter loading, recontamination risk)	HVAC protection and cleaning approach: Section 5. Verification wipes and performance confirmation (indoor air): Section 6.2 and Section 6.3. O&M, inspection, and corrective actions: Section 10.

CSM Element or Pathway	Plan Sections That Implement Controls and Verification
PCB-impacted porous materials (limited locations; where applicable)	Porous verification criteria and treatment confirmation: Section 6.2 and Section 6.4. Treatment methods and documentation: Section 5. Barrier management where not treated: Section 10 and ICs.
Sealants and mastics (potential PCB bulk product materials)	Waste designation and routing: Section 7. Containment and verification to prevent recontamination: Section 6. Decision metric is Total PCBs for verification; waste category is based on material type and removal configuration.
Sub-slab soils and barrier-isolated sources (trigger-based management)	Barrier integrity and restricted-zone requirements: Section 10. Change-management triggers and EPA coordination for intrusive work: Section 6.4.4 and Section 10. Waste designation of generated spoils as PCB remediation waste unless otherwise clearly supported: Section 7.
Exterior pathway uncertainties (facade work, release and recontamination risk)	Work controls, containment, and housekeeping: Section 5 and Section 10. Verification framework for turnover areas: Section 6. Change-management if unexpected pathways or releases are identified.
North Tower (managed closure-in-place)	Basis, restrictions, and ICs: Sections 2 and 10. North Tower stewardship obligations only and does not drive building-wide endpoints.

5.0 Cleanup Approach and Technologies

Section 5 describes the remedy implementation framework and the set of acceptable technologies that may be used to meet the performance criteria in Section 6.2. This Section is structured to support a performance-based approach under 40 CFR §761.61(c) in which the remedy is defined by (1) the pathway(s) being controlled, (2) the target acceptance criteria, and (3) work practices that prevent migration, cross-contamination, and recontamination.

This Plan does not require selection of a single technology for all areas or substrates. Instead, the remedy is implemented through:

1. **Technology Toolbox:**
Acceptable methods and minimum constraints for removing, treating, or controlling PCB-impacted materials and reservoirs.
2. **Location-Based Selection:**
A decision table that selects from the toolbox using paint by location detection, zone occupancy classification, and pathway relevance. The location-based selection framework is intended to remain implementable across changing field conditions without expanding the scope of characterization beyond what is needed to confirm performance.
3. **Performance Criteria Reference:**
Unless explicitly stated otherwise in Section 6.2, cleanup and release of surfaces and zones are demonstrated by meeting the acceptance criteria for:
 - Porous materials: ≤ 1 mg/kg Total PCBs
 - Non-porous wipe surfaces: ≤ 10 $\mu\text{g}/100$ cm² Total PCBs
 - Indoor air: ≤ 0.0215 $\mu\text{g}/\text{m}^3$ Total PCBs (21.5 ng/m³).
4. **North Tower:**
The North Tower is not within the scope of active remediation technologies described in Sections 5.1 through 5.5. North Tower controls are limited to managed-area closure elements and O&M activities described in Section 10.

5.1 Paint and Coatings Remedy Framework

Paints and coatings are addressed using the paint by location detection approach. Each location with a paint/coating detection, or a location reasonably tied to a documented detection by building zone and surface type, is assigned to one of the remedy categories in Table 5-1. Table 5-1 consolidates the coating removal and encapsulation methods by substrate along with the clearance endpoints used to release each surface, and is the primary mechanism that ties documented detections to implementable remedy decisions.

Table 5-1. Coating Removal and Encapsulation Decision

Substrate	PCB Range	Condition and Exposure Context	Required Action	Acceptance Criteria and Verification
Structural Steel (beams, columns, rails)	≥50 mg/kg, or any concentration where coating is deteriorated and in a turnover or mechanically served zone	High-touch or high-wear surfaces; renovation disturbance expected; potential dust generation	Remove coating using controlled methods (for example abrasive blasting or equivalent), implement dust controls, and recoat as required by design.	Non-porous wipe verification ≤10 µg/100 cm ² after final cleaning. Re-clean and re-test until compliant. Document surface preparation and coating system installed.
Structural Steel (low-wear surfaces in restricted areas)	10 to <50 mg/kg where coating is intact and the area remains restricted, or <10 mg/kg where controls are protective	Low contact potential; no planned change in occupancy; restricted-zone management	Clean and encapsulate with a durable system where needed to prevent deterioration and dusting. Maintain restricted access and O&M inspection obligations.	Wipe verification in representative areas ≤10 µg/100 cm ² where turnover is required. Encapsulation subject to adhesion and condition checks and corrective action triggers.
Masonry and Brick (painted surfaces)	≥50 mg/kg in turnover zones, or 10 to <50 mg/kg where disturbance is planned or where verification cannot be achieved by cleaning	Porous substrate with potential for retained residues; surface disturbance can generate debris	Remove coating using methods that minimize substrate damage and control dust. Where encapsulation is used, apply on prepared surfaces with performance confirmation.	Non-porous wipe verification of adjacent contact surfaces ≤10 µg/100 cm ² . Where porous substrate is treated, confirm treated zone ≤1 mg/kg Total PCBs by bulk sampling as applicable.
Concrete Columns and Other Porous Concrete Surfaces	Localized impacts and treated zones; including coating impacts where present	Porous substrate; treatment may require shallow removal or surface treatment	Remove coating and treat affected porous concrete where needed to meet porous criteria. Repair and seal surfaces as required for durability and dust control.	Post-abatement cores in treated zones ≤1 mg/kg Total PCBs. Adjacent non-porous surfaces verified by wipes ≤10 µg/100 cm ² .
Ceilings, Overhead Reservoir Surfaces, and Duct Tops	Any condition where dust reservoirs have confirmed wipe exceedances or where disturbance will mobilize dust	Overhead dust accumulation and potential re-entrainment; maintenance access	HEPA vacuum and wet clean. Remove or treat adjacent sources where required. Implement containment and housekeeping controls.	Verification wipes ≤10 µg/100 cm ² in turnover areas. Apply ongoing housekeeping and inspection triggers for areas that remain restricted.

Substrate	PCB Range	Condition and Exposure Context	Required Action	Acceptance Criteria and Verification
Historic Capped Floors and Barrier Interfaces	Barrier-isolated sources beneath cap or slab	No routine exposure pathway unless barrier is breached or penetrations are created	Manage in place as an engineered control with inspection, repair, and change-management requirements. Coordinate intrusive work with EPA as required.	Barrier integrity documented by inspection and repair records. If a localized repair or breach occurs, verify affected surfaces and zones consistent with Section 6.2.

5.1.1 Remedy Categories and Selection Rules

Paint and coatings locations are assigned to one of the following categories:

- **Category A: Removal Required.**
Locations that require coating removal because the condition, concentration range, or pathway relevance indicates that encapsulation or in-place management cannot reliably prevent exposure or recontamination of mechanically served or high-touch areas.
- **Category B: Cleaning Plus Limited Encapsulation Allowed.**
Locations where coatings are well-bonded, in low-wear settings, and can be reliably maintained under O&M, and where verification demonstrates that the surface can meet wipe acceptance prior to encapsulation and remain stable thereafter.
- **Category C: In-Place Management Under IC/O&M.**
Locations that are outside occupied and mechanically served areas, are controlled-access, and are maintained under restricted-zone controls, housekeeping, and periodic inspection.
- **Category D: Exterior Work-Control Only.**
Locations addressed through exterior containment, debris control, and sequencing integrated with facade work. This category is used where the primary objective is to prevent release and prevent indoor recontamination rather than to turn the exterior surface into an occupied-zone condition.

Selection of the remedy category is controlled by the paint by location detection record and by the pathway drivers summarized in Table 5-1. This framework is intended to prevent overly broad commitments such as removing coatings everywhere, while still ensuring that locations that drive exposure in occupied or mechanically served zones are actively addressed.

Table 5-2 on the following page summarizes paint and coatings findings by major building area based on the July 2025 paint chip sampling results and organizes those findings into the planning-level remedy approach for each area. The table is intended to serve as the primary reference for where PCB-impacted coatings have been documented, the data-supported basis for remedy selection, and the corresponding verification and stewardship considerations.

During implementation, the location-level detection information summarized here is evaluated using the pathway-driver decision framework in Table 5-1 to select the appropriate remedy category for each work area and to focus active coating removal or durable encapsulation in occupied or mechanically served zones, while avoiding unnecessary coating disturbance in areas that do not drive exposure.

Table 5-2. Paint and Coatings Summary by Area and Detection Basis

Area	Component and Substrate	Location Description	Sample ID	Sample Date	Detected Aroclor(s)	Total PCBs (mg/kg)	Category	Exceeds 50 mg/kg	Planned Remedy Category
Office	Paint on Plaster Walls	Plaster walls, 6th floor office	PC-OF-7-1	5/21/2025	1260	11	10 to <50	No	Encapsulate or Maintain with Cleaning and Verification in Work Zones
Office	Paint on Plaster Walls	Plaster walls, 6th floor office	PC-OF-7-2	5/21/2025	1260	5.7	<10	No	Clean and Verify in Work Zones; Maintain Coating if Intact
Office	Paint on Plaster Walls	Plaster walls, 6th floor office	PC-OF-7-3	5/21/2025	1260	6.6	<10	No	Clean and Verify in Work Zones; Maintain Coating if Intact
Office	Paint on Concrete Pillars	Concrete pillars (Office)	PC-OF-1-3	5/21/2025	1254, 1260	13.6	10 to <50	No	Encapsulate or Maintain with Cleaning and Verification in Work Zones
Low Bay	Paint on Metal Cross Beams and Ceiling	Cross beams and ceiling areas (Low Bay)	PC-LB-2-1	5/20/2025	1260	80	≥50	Yes	Remove Where Feasible; Otherwise Encapsulate
Low Bay	Paint on Metal Cross Beams and Ceiling	Cross beams and ceiling areas (Low Bay)	PC-LB-2-2	5/20/2025	1260	180	≥50	Yes	Remove Where Feasible; Otherwise Encapsulate
Low Bay	Paint on Concrete Pillars	Concrete pillars (Low Bay)	PC-LB-1-1	5/20/2025	1260	93	≥50	Yes	Remove Where Feasible; Otherwise Encapsulate
Low Bay	Paint on Concrete Pillars	Concrete pillars (Low Bay)	PC-LB-1-2	5/21/2025	1260	45	10 to <50	No	Encapsulate or Maintain with Cleaning and Verification in Work Zones
Low Bay	Paint on Brick Wall	Brick wall (Low Bay)	PC-LB-4-1	5/21/2025	1260	860	≥50	Yes	Remove Where Feasible; Otherwise Encapsulate
Low Bay	Paint on Brick Wall	Brick wall (Low Bay)	PC-LB-4-2	5/21/2025	1260	73	≥50	Yes	Remove Where Feasible; Otherwise Encapsulate
Low Bay	Paint on Metal Cross Beams and Ceiling	Cross beams and ceiling areas (Low Bay)	PC-LB-2-3	5/20/2025	1260	86	≥50	Yes	Remove Where Feasible; Otherwise Encapsulate
Low Bay	Paint on Vertical I-Beams	Vertical I-beams (Low Bay)	PC-LB-3-1	5/20/2025	1260	170	≥50	Yes	Remove Where Feasible; Otherwise Encapsulate
Diesel Shop	Paint on Vertical I-Beams	Vertical I-beams (Diesel Shop)	PC-DS-3-2	5/21/2025	1260	140	≥50	Yes	Remove Where Feasible; Otherwise Encapsulate
Diesel Shop	Paint on Vertical I-Beams	Vertical I-beams (Diesel Shop)	PC-DS-3-3	5/21/2025	1260	36	10 to <50	No	Encapsulate or Maintain with Cleaning and Verification in Work Zones
Diesel Shop	Paint on Brick Wall	Brick wall (Diesel Shop)	PC-DS-4-3	5/21/2025	1260	78	≥50	Yes	Remove Where Feasible; Otherwise Encapsulate
High Bay	Paint on Vertical I-Beams	Vertical I-beams (High Bay)	PC-HB-3-4	5/21/2025	1260	59	≥50	Yes	Targeted Removal Plus Encapsulation Strategy
High Bay	Paint on Concrete Columns	Concrete columns (High Bay)	PC-HB-5-1	5/21/2025	1260	44	10 to <50	No	Targeted Removal Plus Encapsulation Strategy
High Bay	Paint on Concrete Columns	Concrete columns (High Bay)	PC-HB-5-2	5/21/2025	1260	26	10 to <50	No	Targeted Removal Plus Encapsulation Strategy
High Bay	Paint on Concrete Columns	Concrete columns (High Bay)	PC-HB-5-3	5/21/2025	1260	11	10 to <50	No	Targeted Removal Plus Encapsulation Strategy
High Bay	Paint on Brick Wall	Brick wall (High Bay)	PC-HB-6-1	5/21/2025	1260	99	≥50	Yes	Targeted Removal Plus Encapsulation Strategy
High Bay	Paint on Brick Wall	Brick wall (High Bay)	PC-HB-6-2	5/21/2025	1260	40	10 to <50	No	Targeted Removal Plus Encapsulation Strategy
High Bay	Paint on Brick Wall	Brick wall (High Bay)	PC-HB-6-3	5/21/2025	1260	19	10 to <50	No	Targeted Removal Plus Encapsulation Strategy

- Notes:
- Total PCBs for each paint-chip sample was calculated as the sum of detected Aroclors in the July 2025 paint-chip results
 - All non-detects were treated as zero for the Total PCBs summation where one or more Aroclor concentrations in the sample exceeds 1 mg/kg.
 - North Tower samples excluded.

5.1.2 Technology Toolbox for Paints and Coatings

The following paint and coatings technologies are acceptable for use under this Plan when implemented with the minimum constraints below. The contractor may select among these methods by location to achieve the Section 6.2 acceptance criteria, provided that the selection remains consistent with Table 5-1 and the work controls in Section 9 and Section 10.

- A. Mechanical Removal with On-Tool Capture.
Acceptable for localized areas and complex geometry where controlled, selective removal is required. Minimum constraints: HEPA on-tool capture, controlled debris handling, and work practices that prevent track-out and cross-contamination into occupied areas.
- B. Recyclable Media Blasting within Containment.
Acceptable for larger surface areas where uniform coating removal is needed while minimizing fugitive dust and waste generation. Minimum constraints: fully enclosed containment where required by proximity to occupied areas; negative pressure with HEPA exhaust; media recovery controls; and documented cleanup of the containment prior to release.
- C. Vacuum Blasting Systems with Point-of-Impact Recovery.
Acceptable for sound, accessible surfaces where higher production and aggressive removal are required. Minimum constraints: maintained seal at the blast head, recovery-train HEPA filtration, and surface damage controls on masonry and other fragile substrates.
- D. Dry Ice Blasting as a Cleaning or Pre-Clean Method.
Acceptable for non-porous surfaces and equipment where minimizing secondary media and reducing waste volume is important. Minimum constraints: containment where needed, carbon dioxide accumulation controls, and confirmation that the method achieves the required wipe acceptance criteria.
- E. Contained Chemical Stripping for Limited, Non-Routine Cases.
Acceptable only where mechanical or blasting methods are not practicable and where full containment and residue capture can be maintained. Minimum constraints: contained residue collection, compatible waste handling, and prohibition of uncontrolled rinsate generation.
- F. Limited Encapsulation.
Encapsulation is allowed only where Table 5-1 identifies the location as eligible and where the coating is well-bonded, low-wear, and maintainable under O&M. Minimum constraints: surface preparation to achieve wipe acceptance prior to encapsulation; documented coating system thickness and adhesion checks; mapping of encapsulated areas for O&M; and defined triggers for repair or escalation.

No method is deemed acceptable if it cannot be implemented with dust control adequate to protect occupied areas and new HVAC components from recontamination.

5.1.3 Paint and Coatings Remedy Selection Table

Table 5-1 is the controlling paint and coatings selection table and is built around paint by location detection. It assigns each location to a remedy category and identifies the acceptable toolbox methods, required work controls, and required verification for that location.

5.2 Expansion Joints, Sealants, and Caulks

Expansion joints, perimeter sealants, and similar sealant materials are addressed through controlled removal and replacement where those materials are identified as PCB-impacted or are being removed as part of planned renovation scope. The objective is to remove the sealant bead and associated residues without dispersing debris and to restore the joint to a serviceable condition that does not retain dust or create migration pathways.

Minimum constraints include: controlled scoring and extraction; point-of-removal HEPA capture; chase cleaning and verification of clean, sound joint shoulders; controlled installation of backer rod and replacement sealant consistent with movement and service conditions; and verification of adjacent wipe surfaces in areas where wipe acceptance is required for zone turnover.

Sealant work sequencing must be coordinated with paint/coatings work and with LBP and ACM controls where applicable.

5.3 Porous Substrates and Concrete Surfaces

Porous substrates that require active treatment under this Plan are addressed using controlled surface removal or other treatment methods capable of achieving the porous material acceptance criterion in Section 6.2. The purpose is to remove or treat the impacted surface zone while limiting dust generation, preventing track-out, and preserving structural function.

Acceptable methods include shrouded surface removal equipment with on-tool HEPA capture and other controlled methods that can demonstrate removal depth and post-treatment conditions.

Where porous surface treatment is performed, verification is conducted using the verification approach in Section 6.2. This Section does not establish a universal depth of removal. Removal depth and extent are set by the documented detection condition and by the practical limits required to achieve the acceptance criterion without introducing avoidable structural or constructability impacts.

5.4 HVAC Remediation and Replacement Integration

HVAC work is treated as a core risk-reduction control because HVAC systems can accumulate dust reservoirs and can redistribute PCB-bearing dust if not managed during renovation. The HVAC approach is based on: (1) isolating air circuits by zone before intrusive work, (2) preventing contamination of new components, and (3) confirming performance using the indoor air acceptance criterion in Section 6.2 following zone turnover.

5.4.1 Minimum HVAC Work Controls

Minimum HVAC controls include: isolation of work zones; protection of occupied areas from cross-flow; controlled opening and handling of dust-bearing components; and cleaning or removal of components that cannot be effectively decontaminated.

5.4.2 HVAC Sequencing for Zone Turnover

HVAC sequencing is coordinated with source control in the served zone. Source control for paints, coatings, sealants, and dust reservoirs is completed in the zone before final commissioning of new equipment where practicable. Where sequencing constraints exist, the contractor implements protective measures that prevent contamination of new equipment and defines the verification steps used to confirm indoor air performance following turnover.

5.4.3 Performance Confirmation

Post-installation verification is conducted per Section 6.2, with indoor air monitoring serving as the primary performance confirmation for controls and barriers in mechanically served areas.

5.5 Integration with Facade and Elevator Projects

PCB cleanup activities are integrated with planned facade improvements, HVAC replacement, and elevator modernization to reduce rework and to prevent recontamination of cleaned areas and new building systems. Integration is executed through work sequencing and controls that address EPA's pathway concerns for exterior work and migration.

5.5.1 Coordination with Facade Work

Facade-related work that disturbs exterior paints, coatings, and sealants is managed as a controlled exterior work activity. The objective is to prevent release to the environment and to prevent migration of exterior dust and debris into interior receptor zones.

Minimum constraints include: exterior containments where disturbance occurs; debris capture and controlled removal; controlled staging and decontamination; and protection of envelope openings and penetrations that could transport dust indoors. Where exterior work interfaces with interior mechanically served zones, housekeeping and verification steps are implemented to prevent contamination of indoor spaces.

5.5.2 Coordination with HVAC Replacement

HVAC replacement sequencing is aligned with building-material source control so that new components are installed and commissioned in a condition protected from legacy dust reservoirs. Where HVAC replacement occurs before full source control, protective measures are implemented and documented, and final performance confirmation is conducted following source control completion and zone turnover.

5.5.3 Coordination with Elevator Modernization

Elevator modernization work is coordinated with containment, access control, and housekeeping requirements to prevent debris migration along shafts, chases, and adjacent circulation areas. Any work in or adjacent to controlled zones is performed under restricted-zone protocols and does not expand the remedy footprint beyond documented locations.

5.6 Technology Selection Documentation

For each zone and major work area, the contractor documents:

1. Selected toolbox methods
2. Work controls used to prevent migration and recontamination
3. Verification results supporting zone turnover
4. Waste handling pathways applied under Section 7.

This documentation is part of the project record and supports the closure documentation described in Section 11.

6.0 Sampling and Analysis: Characterization and Verification

This Section defines the sampling and data evaluation steps required to:

1. Support compliant implementation of the remedy described in Section 5, and
2. Verify that cleanup performance criteria have been achieved in areas intended for high-occupancy use or turnover to routine use.

This Section is intentionally structured to avoid commitments to additional characterization beyond what is necessary to execute the remedy and confirm protectiveness. The January 2025 SAP dataset provides the primary characterization basis for this Plan.

This Section distinguishes between:

- **Verification Sampling:** Required when a zone is turned over to high occupancy or when a specific remedy element requires confirmation
- **Conditional Implementation Checks:** Allowed only under defined triggers, and not a standing commitment to new characterization.

All decisions in this Section are made on a Total PCBs basis, defined as the sum of detected Aroclors in a sample (Section 6.4.1).

6.1 Verification Units and Sampling Triggers

6.1.1 Verification Unit Definition

For implementation and verification, the facility is divided into discrete Verification Units (VUs). A VU is the smallest practical decision unit for turnover and verification and is defined by all of the following:

1. A contiguous area with a common use condition (high occupancy, restricted low occupancy, or exterior work control only)
2. A common HVAC service condition (served by the same air distribution zone or isolated from it)
3. A common remedy category (for example coating removal versus in-place management under IC/O&M) VU boundaries are documented on field sketches and in the Completion Report.

6.1.2 Required Verification Triggers

Verification sampling is required when one or more of the following triggers occurs:

- **Turnover Trigger:** A VU is proposed for turnover to high-occupancy use or routine access beyond restricted low-occupancy controls
- **Remedy Confirmation Trigger:** A remedy element requires confirmation by its nature, including (a) porous-material removal that relies on depth-limited treatment, (b) encapsulation where eligibility is met and ongoing O&M applies, or (c) HVAC cleaning or replacement steps intended to prevent recontamination of new equipment
- **Re-contamination Control Trigger:** A VU contains or interfaces with a pathway that could re-contaminate a cleaned or upgraded area (for example adjacency to restricted zones, dust reservoirs, or work that opens pathways through the building envelope)

- Restricted zones that remain restricted and are not proposed for turnover are managed through IC/O&M and performance monitoring under Section 10, not through broad verification sampling commitments in Section 6.

6.2 Verification at a Glance

- Decision Metric: Total PCBs per sample (sum of detected Aroclors)
- Acceptance Criteria Used for Turnover Decisions (Section 6.2.1):
 - o Indoor Air (Total PCBs): $\leq 0.0215 \mu\text{g}/\text{m}^3$ ($21.5 \text{ ng}/\text{m}^3$; $2.15 \times 10^{-5} \text{ mg}/\text{m}^3$)
 - o Non-Porous Wipes (Total PCBs): $\leq 10 \mu\text{g}/100 \text{ cm}^2$
 - o Porous Bulk Materials (Total PCBs): $\leq 1 \text{ mg}/\text{kg}$ ($1 \text{ mg}/\text{kg}$)

Minimum Verification Logic (Applied by Verification Unit):

1. Non-Porous Wipes:
Collect a minimum of 5 wipes per VU in turnover areas, including biased wipes at high-touch points, edges, penetrations, and interfaces, plus additional wipes for large VUs or complex interfaces (Section 6.2.2).
2. Porous Bulk Verification:
Where porous removal is performed, collect at least one post-treatment bulk sample per discrete treated location, plus additional samples where treatment spans a large continuous surface (Section 6.2.3).
3. Indoor Air Confirmation:
Collect indoor air samples in VUs proposed for high-occupancy turnover and in representative receptor locations needed to confirm performance of barriers, source controls, and HVAC protection (Section 6.2.4).
4. HVAC Wipes:
Where HVAC cleaning is used as a protective control, collect confirmation wipes from cleaned HVAC interiors or representative components to document that residues have been controlled (Section 6.2.5).
5. Response to Exceedances:
Any confirmed exceedance of an acceptance criterion triggers corrective action and re-verification in the affected VU before turnover (Section 6.4.4 and Section 6.4.5).

6.2.1 Acceptance Criteria

Acceptance criteria are applied on a Total PCBs basis to determine whether the remedy has achieved the performance objectives for turnover and protectiveness:

- Indoor Air: $\leq 0.0215 \mu\text{g}/\text{m}^3$ Total PCBs
- Non-Porous Wipes: $\leq 10 \mu\text{g}/100 \text{ cm}^2$ Total PCBs
- Porous Bulk Materials: $\leq 1 \text{ mg}/\text{kg}$ Total PCBs.

Analytical reporting limits are performance requirements for the sampling program and are not acceptance criteria. Reporting limits must be sufficiently low to support a compliance determination. Where reporting limits exceed the applicable acceptance criterion, the result is treated as inconclusive for turnover purposes and is

resolved by adjusting sampling conditions or by an alternative verification approach consistent with Sections 6.3 and 6.4.2.

6.2.2 Non-Porous Wipe Verification - Turnover and High-Touch Surfaces

Wipe sampling is used to confirm that non-porous surfaces within a VU meet the wipe acceptance criterion and that residual dust films have been controlled to prevent transfer and recontamination.

Minimum Requirements Per VU (Turnover Areas):

- Collect at least 5 wipe samples per VU, including:
 - o At least 2 biased wipes from high-touch or high-transfer points (for example handrails, door hardware, work surfaces, controls, or frequently contacted edges)
 - o At least 2 biased wipes from interfaces and edges (penetrations, perimeter joints, equipment interfaces, transitions between treated and untreated surfaces)
 - o At least 1 representative wipe from a typical interior location within the VU.

For large VUs or where complexity is high (multiple interfaces or equipment), collect additional wipes to ensure each distinct interface condition is represented. Wipe locations are documented and mapped for traceability.

Decision Rule: Any confirmed wipe result above 10 µg/100 cm² requires corrective cleaning or additional control in the affected area and re-verification before turnover.

6.2.3 Porous Bulk Verification (Concrete, Masonry, and Other Porous Substrates)

Bulk verification is used only where porous materials are actively treated or removed as part of the remedy and where confirmation is needed to demonstrate the porous acceptance criterion for turnover.

Minimum Requirements:

- For each discrete treated location, collect at least one post-treatment bulk sample from the treated substrate
- Where treatment spans a large continuous area, collect additional bulk samples so that spatial coverage is representative of the treated extent and any boundary conditions (edges, transitions, visible condition changes) are captured.

Bulk sampling is not required in zones that remain under restricted controls with no turnover objective, unless a defined trigger in Section 6.6 occurs.

Decision Rule: Any confirmed porous bulk result above 1 mg/kg in a turnover VU requires additional treatment or an alternate control consistent with Section 5 and re-verification before turnover.

6.2.4 Indoor Air Confirmation - Performance Confirmation for Controls and Barriers

Indoor air sampling is used as the primary performance confirmation that (1) source controls are effective in receptor zones, (2) HVAC protection measures have prevented recontamination of new or cleaned components, and (3) barrier and cap performance is protective in areas proposed for high-occupancy use.

Minimum Requirements for Turnover:

- Collect indoor air samples in VUs proposed for high-occupancy turnover, using sampling durations and volumes sufficient to support reporting limits below the indoor air acceptance criterion

- Indoor air sample placement is selected to represent typical receptor locations in the VU and any locations that are important to confirming performance (for example near served supply zones, near interfaces with restricted areas, or near known prior impact areas relevant to turnover).

Post-Remedy Confirmation Cadence:

- For VUs transitioned to high occupancy, indoor air confirmation is conducted on a biannual basis during the initial post-remedy period as part of performance confirmation and breakthrough monitoring. The locations and extent are focused and representative and are not a standing commitment to facility-wide indoor air monitoring in zones that remain restricted and are not proposed for turnover.

Decision Rule:

- Any confirmed indoor air result above the indoor air acceptance criterion in a turnover VU triggers an evaluation of potential sources, pathway controls, and HVAC protection measures, followed by corrective action and re-sampling sufficient to support a compliance determination for that VU before turnover.

6.2.5 HVAC Wipes and HVAC Protection Confirmation

HVAC confirmation wipes are used to document that HVAC cleaning or replacement activities have controlled residues that could otherwise contaminate served areas or new equipment. Where HVAC cleaning is performed as a protective measure for a served VU:

- Collect confirmation wipes from representative cleaned HVAC interior components where accessible, such as supply-side surfaces, return-side surfaces, and a representative internal component (for example coil housing or drain pan area)
- The purpose of these wipes is to confirm that residues have been controlled to protect the served area and equipment. HVAC wipes support the protective narrative but do not replace VU turnover verification, which is determined by the acceptance criteria in Section 6.2.1 and the VU verification results.

HVAC wipe results are evaluated against the non-porous wipe acceptance criterion unless the surface or template condition requires a matrix-appropriate evaluation consistent with Section 6.3.

6.3 Analytical Methods and QA/QC

Sampling and analysis methods are selected to produce defensible Total PCB results appropriate for decision-making and verification.

- Aroclor Analysis: Bulk and wipe samples are analyzed using PCB Aroclor methods consistent with SW-846 8082A or equivalent laboratory procedures used in the SAP dataset, with Total PCBs calculated as the sum of detected Aroclors
- Wipe Sampling: Wipe collection follows 40 CFR §761.123 methods and template requirements unless an alternate equivalent approach is explicitly justified and documented for a specific surface condition

- Indoor Air: Indoor air sampling is performed using EPA TO-10A or TO-4A-equivalent methods consistent with the SAP approach, with volumes and durations selected to achieve reporting limits sufficient for comparison to the indoor air acceptance criterion.

Field QA/QC includes standard elements such as duplicates at a limited frequency appropriate to the number of samples collected in a given event, equipment blanks where applicable, and chain-of-custody controls. Laboratory QA/QC review is performed before results are used for turnover decisions.

6.4 Data Evaluation and Decision Rules

6.4.1 Total PCBs as the Decision Metric

Total PCBs for each sample are calculated as the sum of detected Aroclors reported for that sample. Total PCBs is the primary decision metric for all acceptance criteria determinations in this Plan.

6.4.2 Detection Limits and Non-Detect Handling

Compliance determinations are made using both detections and reporting limits:

- If no Aroclors are detected and the reporting limit is at or below the applicable acceptance criterion, the sample is considered compliant
- If Total PCBs are detected below the applicable acceptance criterion, the sample is considered compliant subject to QA/QC review
- If the reporting limit is above the applicable acceptance criterion, the result is treated as inconclusive for turnover and is resolved by adjusting sampling conditions (for example higher air volume or longer duration) or by alternative verification consistent with this Section.

6.4.3 Comparator Application

Acceptance criteria in Section 6.2.1 are the controlling basis for turnover verification. EPA RSL comparisons are used as screening and interpretive comparators where applied in the Plan and are evaluated on a Total PCBs basis consistent with EPA direction.

6.4.4 Exceedance Response and Re-Verification

If a confirmed exceedance occurs in a turnover VU:

1. Identify the affected micro-area and likely source or pathway driver (surface condition, dust reservoir, interface condition, HVAC protection breach, or work control failure)
2. Implement corrective action consistent with Section 5 and the work controls in Sections 9 and 10
3. Re-verify the affected area with sufficient sampling to demonstrate that the applicable acceptance criterion is met before turnover.

6.4.5 Documentation and Turnover Determination

Turnover is a written release of a Verification Unit (VU) or defined portion of a VU for routine use or high-occupancy use, issued only after review of verification results and documentation demonstrating that the applicable acceptance criteria in Section 6.2.1 have been met and that required work controls and O&M elements are in place. Turnover is not equivalent to construction complete or work complete. Construction completion describes contractor scope status; turnover is an environmental status determination supported by

accepted verification and documented as a written authorization in the project record. If an exceedance is confirmed, corrective action and re-verification are required before turnover. Turnover determinations and the supporting documentation package are maintained in the permanent site record and are summarized in completion documentation prepared under this Plan.

6.5 Conditional Implementation Checks - Not a Standing Commitment

Conditional implementation checks are optional and are performed only under the defined triggers in Section 6.6. These checks are limited in scope and are not a commitment to new facility-wide characterization. Where performed, results are evaluated on a Total PCBs basis and are documented in field memoranda and the Completion Report.

6.6 Optional Sampling Contingencies - Trigger-Based and Conditional Only

Optional sampling is allowed only if at least one of the following triggers occurs:

1. Inconclusive Result Trigger:
A reporting limit exceeds an applicable acceptance criterion in a critical turnover decision location and the result cannot support a compliance determination.
2. Unexpected Condition Trigger:
Previously undocumented suspect material conditions are encountered within a VU proposed for turnover (for example deteriorated coating condition inconsistent with documented paint by location detection assumptions, or unexpected dust reservoirs on critical interfaces).
3. Breakthrough Trigger:
Evidence of breakthrough, deterioration, or compromise of an engineered barrier or encapsulated surface is observed during inspection, or post-remedy indoor air performance indicates a credible recontamination pathway.
4. Change Management Trigger:
Intrusive work is proposed that penetrates or materially alters a barrier (slab, cap, encapsulation) in a manner that could create a new pathway relevant to a receptor zone.
5. EPA-Directed Trigger:
EPA requests targeted additional data for a defined decision purpose. When an optional sampling trigger occurs, the sampling scope is limited to the decision purpose and does not expand the remedy footprint or convert the Plan into a re-characterization program.

The following Tables 6-1 through 6-4 summarize the Section 6 implementation framework for characterization, verification, and data defensibility. Table 6-1 identifies the expected checks by activity type and condition. Table 6-2 consolidates the verification matrix, including density, criteria, and triggers that require additional confirmation or corrective action. Table 6-3 documents the analytical methods and target reporting limits used to support verification decisions. Table 6-4 summarizes the field and laboratory QA/QC elements and data usability checks that support reliance on verification results for turnover determinations.

Table 6-1. Implementation-Phase Characterization and Verification Checks

Location or Unit	Rationale	Minimum Sampling and Documentation	Notes
Concrete (office tower and mechanical spaces; localized detections or treated zones)	Confirm depth-discrete conditions where impacts were identified and confirm treatment or removal endpoints.	Depth-discrete concrete cores at treated locations, generally 4 to 6 cores per work area or Verification Unit, plus any biased cores at treatment boundaries.	Include appropriate field duplicates where practical. Patch cores and document locations with photographs and sketches.
Structural Steel (low bay and high bay; representative and elevated members)	Confirm condition of coated steel surfaces and support remedy selection and turnover verification.	Non-porous wipe samples from representative steel surfaces within each Verification Unit, plus biased wipes at high-touch and high-dust accumulation points.	Coordinate access, fall protection, and containment. Use a 10 cm by 10 cm template per 40 CFR §761.123 where applicable.
Brick and Masonry (select walls and painted masonry features)	Assess potential retention in porous substrates and confirm effectiveness of cleaning, removal, or encapsulation approaches.	Bulk paint chip samples where needed to define coating concentration categories, plus non-porous wipes on representative contact surfaces for turnover decisions.	Avoid spalling and uncontrolled debris. Where porous substrate is treated, use bulk sampling to confirm ≤ 1 mg/kg in the treated zone as applicable.
HVAC (unit interiors, plenums, coils, drain pans, and accessible duct-top reservoirs)	Define and eliminate reservoir sources that could recontaminate cleaned or turned-over zones and protect new HVAC components.	Wipe samples of unit interiors and reservoir surfaces before and after cleaning, plus duct-top and ledge wipes in representative served pathways.	Document unit and component identifiers, locations, and cleaning steps. Maintain chain-of-custody and photo logs.
Expansion Joints, Sealants, and Caulks (remaining seams and targeted areas)	Confirm whether suspect sealant materials remain in place and inform waste designation and work controls where removal is planned.	Targeted bulk sealant samples where needed for decision support and waste profiling.	Any laboratory compositing is for screening only and is not used to demonstrate compliance at turnover.
Indoor Air (seasonal performance confirmation)	Confirm protective performance in turned-over and mechanically served zones under representative seasonal conditions.	Post-work indoor air sampling for Total PCBs in applicable zones, typically one sample per zone per season for a minimum 24-hour duration, with at least two seasonal rounds (cooling and heating).	Sampling volume and duration are set to achieve reporting limits at or below $0.0215 \mu\text{g}/\text{m}^3$ Total PCBs.

Table 6-2. Verification Plan Matrix, Density, Criteria, and Triggers

Matrix	Minimum Density or Coverage	Acceptance Criteria	Re-Test Trigger	Comments
Non-Porous Surfaces (post-cleaning or post-abatement)	Minimum one wipe per 100 ft ² of treated or cleaned non-porous surface within each Verification Unit, plus biased wipes at high-touch and high-dust accumulation points.	≤10 µg/100 cm ² Total PCBs	Any confirmed result >10 µg/100 cm ² , or an inconclusive result where the reporting limit exceeds 10 µg/100 cm ²	Re-clean and re-sample until compliant. Apply the Total PCBs decision metric and QA/QC rules in Section 6.4.
Porous Concrete (treated zones and localized removals)	Depth-discrete cores sufficient to represent the treated zone. As a minimum, one core per 200 ft ² of treated area, plus at least one core at each treatment boundary and at any biased location (for example, staining or prior detections).	≤1 mg/kg (1 mg/kg) Total PCBs in the treated zone	Any confirmed result >1 mg/kg, or an inconclusive result where the reporting limit exceeds 1 mg/kg	Perform additional removal or treatment and re-core until compliant. Document depth intervals and patch locations.
HVAC Interiors (unit interiors, plenums, coils, drain pans)	Minimum three wipes per HVAC unit interior (representing supply plenum, return plenum, and a coil or drain pan surface), plus additional biased wipes where visible residue is present.	≤10 µg/100 cm ² Total PCBs	Any confirmed result >10 µg/100 cm ² , or an inconclusive result where the reporting limit exceeds 10 µg/100 cm ²	Re-clean and re-sample. Replace liners or components if cleaning cannot achieve compliance. Protect new HVAC components from recontamination.
Duct Tops and Overhead Ledges (reservoir surfaces)	Minimum one wipe per 200 linear feet of accessible duct top or overhead ledge within each served pathway, with biased locations at visible dust accumulation and near supply or return transitions.	≤10 µg/100 cm ² Total PCBs	Any confirmed result >10 µg/100 cm ² , or an inconclusive result where the reporting limit exceeds 10 µg/100 cm ²	HEPA vacuum and wet clean; re-sample until compliant for turnover. Maintain housekeeping and inspection triggers for restricted areas.

Matrix	Minimum Density or Coverage	Acceptance Criteria	Re-Test Trigger	Comments
Indoor Air (post-work confirmation in applicable zones)	Minimum one sample per zone per season with a minimum 24-hour duration, unless an alternate duration is justified and documented. Perform at least two seasonal rounds (cooling and heating) where required for turnover or performance confirmation.	$\leq 0.0215 \mu\text{g}/\text{m}^3$ ($21.5 \text{ ng}/\text{m}^3$; $2.15 \times 10^{-5} \text{ mg}/\text{m}^3$) Total PCBs	Any result $> 0.0215 \mu\text{g}/\text{m}^3$, or an inconclusive result where the reporting limit exceeds $0.0215 \mu\text{g}/\text{m}^3$	Adjust Heating, Ventilation, and Air Conditioning settings as needed, implement corrective actions, and re-sample consistent with Section 6.4 and EPA approval conditions.

Table 6-3. Analytical Methods, Target Reporting Limits, and Sample Media

Matrix	Method or Approach	Target Reporting Limit	Notes
Paint Chips (bulk; steel, brick, concrete coatings)	SW-846 Method 8082A or equivalent for Aroclors; report Total PCBs as the sum of detected Aroclors.	At or below 1 mg/kg (1 mg/kg) Total PCBs where used for decision support	Report Aroclor-specific results and Total PCBs. Use discrete results for remedy decisions.
Caulk, Sealant, and Mastic (bulk product materials)	SW-846 Method 8082A or equivalent for Aroclors; report Total PCBs.	At or below 1 mg/kg (1 mg/kg) Total PCBs where used for decision support	Any laboratory compositing is for screening only and is not used to demonstrate compliance or to change waste type. Waste type is based on material definition and removal configuration per Section 7.
Concrete Cores (porous substrate; depth-discrete intervals)	SW-846 Method 8082A or equivalent for Aroclors; report Total PCBs. Collect depth-discrete intervals as needed.	At or below 1 mg/kg Total PCBs for turnover-related porous verification	Use depth-discrete results to confirm removal or treatment to $\leq 1 \text{ mg}/\text{kg}$ in treated zones. Document depth intervals.
Non-Porous Surface Wipes	Wipe sampling per 40 CFR §761.123 with laboratory analysis for Aroclors and Total PCBs.	At or below $10 \mu\text{g}/100 \text{ cm}^2$ Total PCBs	Use a 10 cm by 10 cm template. Report in $\mu\text{g}/100 \text{ cm}^2$. Apply Total PCBs decision metric and QA/QC rules.
Indoor Air (performance confirmation)	EPA Method TO-10A or TO-4A equivalent for Total PCBs as implemented in the approved Sampling and Analysis Plan.	At or below $0.0215 \mu\text{g}/\text{m}^3$ Total PCBs	Sampling duration and volume are selected to achieve reporting limits at or below the acceptance criterion. Include field blanks and laboratory QA/QC consistent with the SAP.

Matrix	Method or Approach	Target Reporting Limit	Notes
HVAC Reservoir Surfaces and Interior Components	Wipe sampling per 40 CFR §761.123 with analysis for Aroclors and Total PCBs.	At or below 10 µg/100 cm ² Total PCBs	Used for pre-cleaning characterization and post-cleaning verification on plenums, coils, drain pans, duct tops, and similar reservoir surfaces.

Table 6-4. Field and Laboratory QA/QC Summary

QC Element	Frequency	Purpose
Field Duplicates	At least 10 percent of samples per event where practical	Precision check on sampling and analysis
Equipment Blanks	Daily during sampling activities or per equipment decontamination batch	Detect field and equipment cross-contamination
Trip Blanks (air sampling media where applicable)	One per shipment or cooler	Verify transport integrity and identify contamination during handling
Laboratory QA and QC	Per analytical method requirements	Method blanks, surrogates, matrix spikes where applicable, and laboratory control samples to support data usability

7.0 Waste Management and Decontamination

7.1 Classification and Disposal

PCB wastes generated under this Plan are classified and managed consistent with 40 CFR Part 761, EPA's current policy for building materials impacted by historical spills and PCB-containing products, EPA's 2012 PCB bulk product reinterpretation, and EPA's 2015 PCBs in Building Materials Q&A. For characterization purposes, this Plan distinguishes between: (1) PCB-containing manufactured products (for example certain legacy caulks, sealants, mastics, coatings, and floor tile/mastic systems), and (2) materials that are not PCB products as manufactured but have become contaminated through spills, historic oiling, or PCB-bearing dust (for example brick, concrete, spray-on insulation, ceiling materials, and later-applied paint systems).

For disposal purposes, final waste designations (PCB remediation waste, PCB bulk product waste, PCB articles, or PCB liquids) are made in the field at the time of removal based on the configuration and origin of each material, consistent with 40 CFR §761.61 and 761.62 and EPA's bulk-product guidance.

For structural repair and renovation activities executed under the project PCB Protocol, the Protocol governs the supporting documentation workflow for these designations (including segregation, labeling, Location ID-based waste tracking, and photo documentation) and the maintenance of records in the site file consistent with Section 13.

This Plan governs performance endpoints, verification requirements, and turnover determinations (including the acceptance criteria in Table 3-1 and the method and verification logic in Table 5-1 and Section 6). The project PCB Protocol is an implementing document for renovation activities. The Protocol governs field execution details, including work practices, worker protection controls, segregation and labeling practices, and the waste designation documentation workflow (including Location ID-based tracking, photo documentation, and load/shipment recordkeeping) used to support TSCA waste designations under Section 7. The Protocol does not modify TSCA regulatory definitions or the acceptance criteria and turnover process established by this Plan.

Three principal categories are used:

- **PCB remediation waste (40 CFR §761.3, 761.61):** Building materials, dust, and other media that contain PCBs primarily due to spills, leaks, oiling, or migration from historically contaminated oils and dust. At the MET Center this category generally includes interior and exterior concrete, brick and masonry, concrete overlays, blasting media and fines, coating debris in historically oiled or dust-impacted areas, accumulated dust reservoirs, and joint materials impacted by oil migration rather than by original product content.
- **PCB bulk product waste (40 CFR §761.3, 761.62):** Discarded manufactured products and materials in which PCBs were intentionally added or present as contaminants in pre-1978 building materials, such as certain caulks, glazing compounds, mastics, and resilient flooring systems. Consistent with EPA's 2012 reinterpretation, building-material pieces removed together with PCB-containing caulk, sealant, mastic, or similar products may, where the product remains adhered at the time of removal and is the primary source of PCBs in that assembly, be managed as PCB bulk product waste under 40 CFR §761.62.
- **PCB articles and PCB liquids (40 CFR §761.60):** PCB-containing ballasts, transformers, capacitors, oils, and other manufactured items that meet the definition of PCB articles or PCB liquids.

EPA Region 7 has indicated that, given the facility's history as a PCB spill and remedial-action site, its default expectation is that many PCB-impacted building-material wastes generated by this cleanup will be managed as PCB remediation waste, particularly where impacts are clearly driven by historical oiling and/or airborne deposition rather than solely by the original manufactured PCB content of a product. This Plan acknowledges that expectation and, in clearly spill-impacted zones (for example historic High Bay, Low Bay, and Diesel Shop surfaces and associated secondary reservoirs), anticipates managing most steel and masonry coatings, concrete, and brick as PCB remediation waste, even where concentrations exceed 50 mg/kg. However, the Plan does not assume that all PCB-impacted building materials at the MET Center are remediation waste in the sense of building-material origin and preserves the ability to apply the PCB bulk product provisions of 40 CFR §761.62 in those instances where the configuration and origin of a removed material clearly fit EPA's bulk-product framework.

For PCB remediation waste:

- Non-liquid PCB remediation waste, including coating debris, blasting fines, dust and sweepings, concrete and masonry rubble, filters, personal protective equipment, and investigation-derived waste, will be managed under 40 CFR §761.61.
- Materials with Total PCBs at or above 50 mg/kg will be managed as TSCA PCB remediation waste and routed primarily to TSCA-approved or RCRA Subtitle C hazardous waste landfills, or to TSCA incineration as needed.
- Materials with Total PCBs below 50 mg/kg will be managed as PCB remediation waste under 40 CFR §761.61, with disposal options and facility selection determined on a case-by-case basis in consultation with EPA and the receiving facility and documented in the Completion Report.

For PCB bulk product waste:

- PCB bulk product waste such as pre-1978 caulks, certain glazing compounds, mastics, and similar manufactured products (including attached substrate pieces removed with the product intact) will be managed under 40 CFR §761.62.
- Subtitle D disposal under 40 CFR §761.62(b)(1) or (b)(2) may be used for non-liquid PCB bulk product waste where state and facility conditions are met and after pre-approval by the receiving facility. Where Subtitle D disposal is not available or not appropriate, bulk product wastes will be sent to TSCA landfills or TSCA incineration.

PCB articles and PCB liquids, including any PCB-containing ballasts and oils, will be managed under 40 CFR §761.60 through vendor-managed programs or TSCA-approved facilities, with no field dismantling of PCB articles.

Waste profiles will be prepared for each major waste stream (for example coating debris, concrete rubble, blasting fines, caulks and sealants, filters, personal protective equipment, and investigation-derived waste). Manifests and bills of lading will be compiled in the Completion Report, with classification (remediation waste, bulk product waste, article, liquid), concentration ranges, and disposal facilities documented for each stream.

The North Tower is not included in the active removal or encapsulation scope under this Plan. Because that structure will remain closed to occupancy and routine access, building materials within the North Tower are not designated as PCB waste at this time and will continue to be managed in place under ICs. If any North

Tower materials are disturbed or removed in the future, waste classification and routing for those materials will be determined at that time in consultation with EPA using the same TSCA framework for remediation waste and bulk product waste described in this section. The North Tower characterization data included in the 2025 Sampling and Analysis Report are used solely to support the closure-in-place and institutional control strategy and are not used to drive waste classification decisions for other building areas.

Waste designation under this Plan follows TSCA definitions and is based on the nature and origin of the material and how it is removed, not on sampling alone. PCB bulk product waste (40 CFR §761.62) applies to manufactured PCB products and product layers such as caulk, sealants, mastics, and similar materials. PCB remediation waste (40 CFR §761.61) applies to contaminated media and substrates impacted by spills, oiling, deposition, or migration, including concrete, masonry, metals, dust, and coating-removal debris. Consistent with the project bulk product rule, when a manufactured PCB product remains adhered to a building substrate at the time of removal, the combined item may be managed as PCB bulk product waste under §761.62; when the product is separated from the substrate prior to disposal, the separated product is PCB bulk product waste and the remaining contaminated substrate is PCB remediation waste managed under §761.61. Sampling may be used, where needed, to support waste profiling and receiving facility acceptance for a defined waste stream. Sampling does not change which TSCA definition applies. For the facade structural repairs/renovations work planned to begin in early 2026, waste designation documentation follows a contractor-facing PCB Protocol presumptive greater than 50 mg/kg approach for bulk product waste streams, and sampling (if performed) is limited to receiving facility profiling or other defined needs that do not alter TSCA definitions.

7.2 Temporary Storage and Decontamination

Storage areas will meet 40 CFR §761.65(c) standards, including marking, spill-resistant floors or curbing, and compliance with storage time limits. Accumulation time will be minimized and coordinated to enable direct shipment so that wastes do not remain on site longer than necessary.

PCB remediation wastes and PCB bulk product wastes will be staged in clearly segregated areas or containers, with labels indicating classification, source area, and intended disposal facility type (TSCA landfill, RCRA Subtitle C landfill, Subtitle D landfill, or TSCA incineration). Containers for PCB articles and liquids will be segregated from solid wastes, with secondary containment appropriate for liquid management.

Reusable tools and equipment will be decontaminated consistent with 40 CFR §761.79. Rinsates and disposable media generated during decontamination will be managed as PCB remediation waste unless analytical or wipe data demonstrate that PCB concentrations are below applicable decontamination standards.

7.3 Waste Stream Classification Matrix

All PCB wastes will be marked, labeled, and manifested consistent with 40 CFR Part 761. Staging will occur on impervious secondary containment with container closure verified prior to transport. The waste stream matrix in this section summarizes classification (PCB remediation waste, PCB bulk product waste, PCB articles, or PCB liquids), packaging, and primary disposal pathways for each major waste stream, based on 40 CFR Part 761, EPA's 2012 bulk product reinterpretation, and the MET Center building-materials data.

For key building materials:

- Exterior brick and mortar: When removed from historically oiled or dust-impacted areas, brick and mortar will be classified as PCB remediation waste, regardless of concentration, because PCB impacts are primarily from historical oiling and deposition rather than from a manufactured PCB product.

- Interior and exterior concrete (including overlays and caps):
Concrete removed from areas impacted by historical spills, oiling, or dust will be managed as PCB remediation waste. The existing 1980s warehouse concrete overlay cap is treated as an engineered barrier; any removed segments of the cap or underlying slab will be classified as PCB remediation waste.
- Paints, mastics, and coatings:
Coating debris, blasting media, and dust from historically oiled or dusty areas are classified as PCB remediation waste. Where a discrete manufactured product (for example a PCB-containing mastic or coating system) can be removed with minimal substrate and its PCB content is dominated by the original product rather than by oil intrusion, that debris may be classified as PCB bulk product waste and managed under 761.62.
- Caulks and sealants:
Pre-1978 caulk and expansion joint materials identified as PCB-containing will generally be managed as PCB bulk product waste, including substrate pieces removed together with the caulk, consistent with EPA's 2012 bulk product reinterpretation, provided that the primary source is the original product. Joint materials demonstrably impacted by oil migration rather than by original product content will be treated as PCB remediation waste.
- Glazing systems and window components:
Where PCB impacts are associated with manufactured glazing compounds or sealant components and these can be removed as discrete product assemblies, they will be managed as PCB bulk product waste. Window frames or sills with PCB impacts from spills or airborne deposition will be treated as PCB remediation waste.

The waste stream matrix identifies, for each stream, whether Subtitle C, Subtitle D (for eligible bulk product wastes), TSCA landfill, or TSCA incineration is the primary disposal route. Subtitle D disposal under 761.62(b)(1) or (b)(2) is used only for non-liquid PCB bulk product wastes where facility conditions, state requirements, and EPA expectations are met and pre-approval is documented.

Table 7-1 provides the waste stream classification matrix linking source materials to their TSCA categories, packaging and staging requirements, and primary disposal pathways.

Table 7-1. Waste Streams, Profiles, Containers, and Receiving Facilities

Waste Stream	TSCA Waste Category and Basis	Containers	Typical Receiving Facility Type	Key Notes and Controls
Coating Debris (paint chips, blast fines, spent media)	PCB remediation waste under 40 CFR §761.61. Generated during disturbance and removal activities. Manage based on Total PCBs and other hazardous waste characteristics, if any.	Lined roll-offs, supersacks, or drums as appropriate; covered and labeled	TSCA-approved disposal facility; RCRA Subtitle C facility if hazardous waste characteristics apply	Segregate by waste stream. Prevent commingling with bulk product waste. Track loads and maintain waste profiles and manifests.

Waste Stream	TSCA Waste Category and Basis	Containers	Typical Receiving Facility Type	Key Notes and Controls
Sealants and Caulks Removed with Adhered Substrate Fragments	PCB bulk product waste under 40 CFR §761.62 when the bulk product remains adhered to substrate at the time of removal. If the bulk product has been removed and residual substrate remains contaminated, that residual substrate is PCB remediation waste under 40 CFR §761.61.	Lined roll-offs or drums; manage to prevent release of fragments and dust	Subtitle D facility where allowed and conditions are met under 40 CFR §761.62(b)(1) or (b)(2), or TSCA-approved landfill or incineration as applicable	Do not separate product from substrate solely to change classification. Provide any required notices and meet state and facility acceptance criteria.
Floor Tile and Mastic	Removed tile and associated mastic, when managed as a manufactured product waste stream, are generally PCB bulk product waste under 40 CFR §761.62. Any contaminated residual substrate remaining after product removal is PCB remediation waste under 40 CFR §761.61.	Lined roll-offs, covered and labeled	Subtitle D facility where allowed under 40 CFR §761.62, or TSCA-approved landfill as applicable	Keep product waste segregated. Manage dust and debris controls during removal. Treat any stained or contaminated underlying substrate as remediation waste if removed.
HVAC Dust, Filters, and Replaceable Components	PCB remediation waste under 40 CFR §761.61. Reservoir materials and filters are generated through cleaning and replacement activities.	Bags within drums, or lined containers; sealed and labeled	TSCA-approved landfill; RCRA Subtitle C facility if hazardous waste characteristics apply	Document component identifiers, locations, and load tracking. Do not blow down or dry-sweep. Maintain cleaning and verification records.
PPE, Poly Sheeting, and Disposable Containment Materials	PCB remediation waste under 40 CFR §761.61. Generated during regulated work and managed as contaminated debris.	Bags within drums or lined roll-offs; sealed and labeled	TSCA-approved landfill; other permitted facility only where allowed by TSCA and state requirements	Use representative profiling consistent with waste stream knowledge and conditions. Maintain segregation and prevent release during handling.
Decontamination Fluids (water or solvent rinsates)	PCB liquids managed under 40 CFR §761.60 and applicable disposal requirements.	Totes or drums; closed and labeled	Approved liquid treatment or disposal facility	Profile each batch before shipment and maintain documentation. Prevent discharge to stormwater or sanitary systems unless explicitly permitted and documented.

Waste Stream	TSCA Waste Category and Basis	Containers	Typical Receiving Facility Type	Key Notes and Controls
Fluorescent Light Ballasts (historic PCB-containing ballasts, if present)	PCB articles managed under 40 CFR §761.60, typically via vendor-managed collection and disposal.	Approved ballast containers or drums; intact and labeled	TSCA-approved disposal pathway via vendor or approved facility	Do not dismantle ballasts in the field. Maintain chain-of-custody documentation through the vendor program.

7.4 Manifesting, Storage, and Marking

Containers will be closed, labeled, and stored on impervious secondary containment with timeframes coordinated to transport scheduling. Reusable tools and equipment will be decontaminated to 40 CFR §761.79 standards; rinsates will be managed as remediation waste unless shown clean by wipe or analysis.

7.5 Management of Untested and Newly Encountered Materials

During interim renovations (including facade work, HVAC replacement, elevator modernization, high-bay structural repairs, and interior improvements performed while other zones remain under controls) and during final remediation, workers may encounter building materials that were not previously sampled but are suspected for PCB impacts based on age, location, staining, dust accumulation, or contact with historically oiled surfaces. EPA has directed that building materials known or reasonably suspected to be PCB-impacted must be managed under TSCA when disturbed (including disturbance for renovation, demolition, remediation, or routine operations). Unless the disturbed material is a discrete manufactured product qualifying as PCB bulk product waste under 40 CFR §761.62, the default designation for known or reasonably suspected PCB-impacted building materials and debris is PCB remediation waste managed under 40 CFR §761.61.

This Plan manages untested and newly encountered materials using the following decision controls, which are designed to be conservative without creating a standing commitment to new characterization.

1. Field Identification and Segregation at the Point of Generation.

Newly encountered materials are immediately assigned to one of the following waste stream types based on physical characteristics and the documented setting:

- **Discrete Manufactured Product Waste Stream:** Items that are manufactured PCB products or assemblies (for example caulk and sealant beads, glazing compounds, mastics, adhesives, and similar product layers), including product removed with a small amount of attached substrate when the product remains adhered at the time of removal.
- **Spill, Oiling, or Deposition Impacted Substrate or Secondary Media:** Materials whose PCB impacts are attributable to historical oiling, staining, deposition, or contact, including concrete, masonry, metal substrates, dust, debris, and coating removal residuals generated from impacted areas.
- **PCB Articles and Liquids:** Articles (for example light ballasts and other regulated articles) and liquids or decontamination fluids, which are managed under the applicable TSCA requirements for those streams.

Segregation and labeling are performed at the point of generation to prevent cross-contamination and to preserve waste designation integrity.

2. Default Management Rule for Untested Suspect Materials.

For untested materials encountered in areas with documented or reasonably suspected spill, oiling, or dust deposition conditions, the default designation is PCB remediation waste once disturbed and the material is managed and disposed under 40 CFR §761.61, unless it is clearly a discrete manufactured product waste stream as described above.

This default rule implements EPA's direction for materials that are "known or reasonably suspected" to be impacted, while avoiding expansion of the remedy footprint beyond documented conditions.

3. Established Bulk Product versus Remediation Waste Rule for Newly Encountered Materials.

If the newly encountered material is a manufactured product layer (for example caulk, sealant, glazing compound, mastic, adhesive, or a similar product) and the product remains adhered to the substrate at the time of removal, the combined item may be designated and managed as PCB bulk product waste under 40 CFR §761.62, consistent with the project bulk product rule. If the product is separated from the substrate prior to disposal, the separated product is managed as PCB bulk product waste, and the remaining contaminated substrate is managed as PCB remediation waste under 40 CFR §761.61.

4. Limited Confirmatory Sampling (Conditional, Not a Reclassification Tool)

Confirmatory sampling does not change TSCA regulatory definitions. Sampling is used only to support a defensible application of the definitions and to support waste profiling and receiving facility acceptance.

Accordingly, limited confirmatory sampling may be performed only under one of the following conditions:

- Waste Profile Support for a Discrete Product Stream:

A newly encountered material is reasonably believed to be a manufactured product waste stream (for example caulk, sealant, glazing compound, mastic) and confirmatory sampling of the product component is needed to document PCB concentration for waste profiling and to evaluate available §761.62 disposal options, including consideration of Subtitle D routing under §761.62(b) where TSCA conditions and receiving facility acceptance criteria are met.

- Volume Threshold for a Defined Stream:

The volume of a single, well-defined stream is sufficiently large that profiling certainty is necessary to avoid mixed designations, to maintain segregation, and to support implementable disposal logistics.

Confirmatory sampling is not performed for the purpose of attempting to convert spill, oiling, or deposition impacted substrates or secondary media into PCB bulk product waste. Sampling scope, density, and methods follow the conditional sampling framework in Section 6 (trigger-based approach) and are documented in field change notices and the Completion Report.

5. Materials Left in Place Are Not Wastes

Where a suspect material is not removed and remains in service, it is not designated as a waste stream under this Section. Such materials are managed through the remedy controls in Section 5 and

the ICs and O&M program in Section 10, including mapping and inspection triggers where encapsulation or restricted access applies.

6. Interim Renovations and Documentation Controls

For interim renovation activities that proceed before all planned remedy elements are complete, contractors implement the default management rule in Item 2, apply the containment, decontamination, and housekeeping controls in Section 9, and maintain waste stream segregation. Any confirmatory sampling performed under Item 4 and any resulting refinements to waste profiles or routing are documented through field change notices and incorporated into the Completion Report.

8.0 Greener Cleanup Practices Implementation

This PCB cleanup application incorporates EPA's Principles for Greener Cleanups and adheres to applicable Best Management Practices from ASTM Standard Guide E2893-13 to minimize the environmental footprint of remediation activities while maintaining protection of human health and the environment.

8.1 Energy and Resource Conservation Measures

HVAC System Optimization:

Priority remediation of occupied zones allows continued use of existing building infrastructure, avoiding energy-intensive temporary ventilation systems. Post-cleanup HVAC commissioning will improve overall building energy efficiency.

Waste Minimization:

Source removal techniques (coating removal, caulk replacement, targeted material removal) minimize waste volumes compared to wholesale building material replacement. Selective removal reduces both waste generation and replacement material consumption.

Equipment Selection:

Use of low-emission, electric-powered equipment where feasible, including HEPA vacuum systems and electric-powered containment fans, reducing diesel fuel consumption and associated emissions.

8.2 Air Quality and Emissions Control

Visual Dust Monitoring:

Routine visual observation of dust levels at work areas and containment boundaries will be used to verify that engineering controls are preventing visible dust migration and unnecessary releases, reducing the potential for post-release corrective measures.

Negative Pressure Containments:

Point-source capture systems with HEPA filtration prevent environmental release and reduce overall project air emissions compared to uncontrolled removal activities.

Low-Emission Removal Techniques:

Preference for chemical stripping and dry ice blasting over abrasive techniques where applicable reduces airborne particulate generation.

8.3 Material and Waste Management Optimization

Segregation and Recycling:

Non-PCB building materials removed during cleanup will be segregated for recycling where possible, reducing landfill burden and conserving raw materials.

Packaging Optimization:

Waste containerization using appropriately-sized containers and efficient loading reduces transportation impacts and packaging material consumption.

Local Disposal Preference:

Selection of TSCA-approved disposal facilities considering transportation distance to minimize fuel consumption and associated emissions.

8.4 Water Conservation and Management

Wet Cleaning Protocols:

Use of minimal water volumes for post-removal cleaning, with recovery and reuse where possible to reduce both consumption and wastewater generation.

Stormwater Protection:

Containment systems prevent potential PCB-containing water from entering storm drains, eliminating downstream treatment requirements.

8.5 Green Technology Integration

HVAC Filter Upgrades: Installation of high-efficiency filters during HVAC system remediation improves long-term indoor air quality while reducing energy consumption compared to standard filtration.

Coating Systems:

Selection of low-VOC encapsulant coatings where encapsulation is preferred over removal reduces both environmental impact and worker exposure.

8.6 Transportation and Logistics Optimization

Coordinated Scheduling:

Phased implementation approach reduces overall site mobilization events and associated transportation impacts.

Consolidated Shipments:

Waste consolidation and scheduling optimization reduces transportation frequency and associated emissions.

8.7 Long-Term Environmental Benefits

ICs:

The deed restriction and O&M program prevents future uncontrolled exposures, eliminating the need for more intensive future remedial actions.

Building Preservation:

Interior remediation approach preserves the existing building infrastructure, avoiding demolition waste and new construction environmental impacts.

Energy Efficiency Enhancement:

HVAC system improvements implemented during cleanup will provide ongoing energy savings throughout building operation.

8.8 Performance Metrics and Monitoring

Greener cleanup implementation will be tracked through:

- Waste diversion rates from landfill disposal

- Energy consumption documentation during cleanup activities
- Transportation mile reduction through logistics optimization
- Air emissions reductions through containment effectiveness.

These measures demonstrate that effective PCB risk management can be achieved while minimizing environmental footprint, consistent with EPA's commitment to sustainable remediation practices.

9.0 Health, Safety, and Exposure Controls

9.1 Engineering Controls

Negative-pressure containments, point-source capture, and HEPA filtration will be used for all intrusive work. Penetrations and HVAC openings will be sealed during adjacent activities to maintain pressure control.

9.2 Administrative Controls

Work-area access will be limited to trained personnel. Adjacent tenants will receive scheduling notices. Signage and barrier plans will be posted. Hot-work and after-hours work will be coordinated to reduce occupant exposure.

9.3 Cross-Contamination Prevention

Staged dirty and clean zones will be established, with tool assignment by zone and change-out procedures to minimize cross-contamination between work areas and adjacent occupied spaces. Daily supervisor walk-downs will verify compliance with containment, housekeeping, and equipment-use requirements and will identify opportunities for improvement. Failed wipes at containment boundaries or in adjacent areas will be addressed by re-cleaning and a brief cause analysis, with corrective actions documented.

9.4 Site-Specific Health and Safety Plan and Job Safety Analyses

A site-specific Health and Safety Plan (HASP) will be prepared and implemented for all remediation work. The HASP will include a Job Safety Analysis (JSA) for each primary task (for example, coating removal, abrasive blasting, dry ice blasting, chemical stripping, concrete scarification/planing, caulk removal, HVAC cleaning and replacement, waste handling, and decontamination). JSAs will identify task steps, hazards, controls, and stop-work criteria. Protective measures will address both workers and building occupants and will include negative-pressure containments, local capture with high-efficiency particulate air filtration, access control, communication and scheduling to avoid sensitive periods, hazard communication, personal protective equipment, exposure monitoring, decontamination procedures, emergency response, and medical surveillance, as applicable.

10.0 Institutional Controls and Long-Term Operations and Maintenance

This Section establishes the ICs and long-term O&M requirements necessary to maintain protectiveness and compliance with the EPA-approved risk-based cleanup under 40 CFR §761.61(c). ICs and O&M apply to:

1. PCB remediation waste that remains in place under engineered barriers or managed-area controls
2. Any encapsulated or otherwise controlled surfaces
3. Controlled-access restricted zones, and
4. Conditions relevant to EPA's concerns regarding exterior building materials and known or suspected sub-slab soils, without creating a new sub-slab sampling program.

This Section implements EPA's direction that the facility-wide work plan include post-remediation confirmation sampling and monitoring for breakthrough of capped or encapsulated areas, and that all PCB remediation waste expected to be managed or to remain onsite be documented in EPA-approved ICs with a long-term monitoring and maintenance plan.

Key Presumption and Control

For purposes of long-term protectiveness:

- Sub-slab soils are presumed PCB-impacted in localized areas based on site history and EPA direction
- The existing building slab and the warehouse cap function as engineered barriers that isolate these materials
- No new sub-slab soil sampling is proposed as part of routine O&M. Ongoing protectiveness is demonstrated through engineered barrier inspections, restricted-zone controls, and indoor air performance confirmation in receptor zones.

North Tower Scope

The North Tower is a managed-area closure-in-place zone. North Tower controls are implemented through physical access restrictions, deed restrictions, and inspection and maintenance to preserve enclosure integrity. North Tower conditions do not set cleanup standards for other building areas.

The North Tower is treated as a permanently closed, non-occupiable managed area. North Tower sampling results are used solely to define North Tower containment, access restrictions, and O&M obligations, and are not used to establish cleanup standards, acceptance criteria, or verification obligations for other building areas.

10.1 Institutional Controls Instrument and Use Conditions

ICs will be implemented through an ICs instrument (deed notice or environmental covenant) recorded against the property. The instrument will:

1. Identify and map managed areas and engineered controls (including the warehouse cap and any encapsulated or otherwise restricted areas)
2. Establish enforceable use restrictions and activity restrictions (including restrictions on intrusive work that could compromise engineered barriers)

3. Require an O&M program with defined inspection, monitoring, recordkeeping, and corrective action requirements consistent with Section 10.3
4. Establish notice and coordination requirements for activities that could disturb PCB remediation waste or compromise engineered controls.

ICs are structured to support continued facility use by allowing turnover of areas to routine use only when verification demonstrates that acceptance criteria in Section 6 are met and when required O&M elements are in place.

10.2 Deed Notice and Covenant Requirements

The ICs instrument will include, at a minimum, the enforceable elements listed below. Final legal drafting will be completed by counsel, but the technical content and enforceable commitments shall remain consistent with this Section.

Draft ICs instrument language and the Technical Attachment exhibit framework included in this Plan are provided to illustrate intended structure and enforceable technical concepts. The recorded ICs instrument package, including Exhibits E-A and E-B, is not attached to this initial 40 CFR §761.61(c) submittal. Plan-scale draft exhibits and instrument language will be made available upon request during EPA review. Final recordable ICs language and final exhibits will be finalized after remediation outcomes are known and as-built conditions are documented, and will be submitted as part of the post-remedy as-built ICs package consistent with EPA approval conditions.

The draft covenant-related exhibit included with this Plan (Technical Attachment to Environmental Covenant) is provided to illustrate the intended IC structure and technical content and is not the final recorded instrument.

The final ICs instrument and any incorporated technical attachment will be finalized after remedy implementation and verification outcomes are known, including incorporation of the Completion Report and as-built exhibits identifying final managed-area boundaries and engineered control locations.

10.2.1 Managed Areas and Engineered Controls Covered by the Instrument

The instrument will identify and map the following, as applicable:

- Warehouse cap footprint and any other engineered barrier areas
- Restricted zones (at a minimum including the Low Bay and Diesel Shop; other zones as identified in the Completion Report based on remedy status and verification outcomes)
- North Tower managed-area closure boundaries
- Encapsulated areas or other locations where PCB remediation waste remains in place under engineered controls
- Areas of known or reasonably suspected PCB remediation waste remaining onsite, including conditions addressed through barriers and controls rather than removal.

10.2.2 Use Restrictions and Activity Restrictions

The instrument will include enforceable restrictions that:

- Prohibit routine occupancy of restricted zones except under controlled-access conditions defined in Section 10.3.7
- Require the warehouse cap and building slab to remain intact and effective as engineered barriers
- Prohibit intrusive activity within engineered control footprints or restricted zones (including excavation, coring, saw-cutting, anchoring, or penetrations) unless conducted under a written, TSCA-compliant work plan consistent with this Plan and coordinated with EPA as required by the approval conditions.
- Require that PCB remediation waste disturbed for any purpose be managed and disposed in accordance with Section 7 and 40 CFR §761.61.

10.2.3 Exterior Materials and Release Prevention Commitments

The instrument will require that exterior building materials that are known or reasonably suspected to be PCB-impacted and that are retained in place under the selected remedy be managed to prevent releases. This is accomplished through:

- Periodic visual inspection of exterior coatings, sealants, and envelope interfaces that are within the O&M scope
- Timely stabilization and repair of deteriorated coatings or sealants that could generate debris or dust
- Work controls and waste handling requirements for any exterior maintenance or renovation that disturbs suspect materials, consistent with Section 9 and Section 7.

These requirements are intended to address EPA's exterior pathway concerns through practical controls and maintenance, not through routine exterior sampling.

10.2.4 North Tower Closed Management Area Requirements

The instrument will define the North Tower as a closed management area with:

- No routine occupancy or routine access
- Access limited to authorized inspection and maintenance personnel as necessary to preserve the enclosure and controls, under written procedures and appropriate controls
- No intrusive work or change in status without EPA coordination consistent with the approval conditions and the change-management process.

10.3 Operations and Maintenance Program

The O&M Program maintains protectiveness after remedy implementation by ensuring engineered barriers remain effective, restricted-zone controls are maintained, dust reservoirs and re-contamination pathways remain controlled, and performance confirmation monitoring is conducted as required.

10.3.1 General Requirements and Scope

O&M applies to the following program elements:

Engineered barrier maintenance for the warehouse cap and the building slab as barrier systems in managed areas.

- Monitoring and maintenance of encapsulated coatings and other engineered controls
- Housekeeping and dust control practices to prevent re-contamination and transfer
- Restricted-zone access controls and signage
- Performance monitoring and post-remediation confirmation sampling as required by the EPA approval conditions, including indoor air confirmation and monitoring for breakthrough of engineered controls
- Exterior condition monitoring and practical release prevention for retained suspect exterior materials within the O&M scope
- Corrective actions and documentation.

O&M does not create a standing commitment to new characterization. Sampling under O&M is limited to performance confirmation and breakthrough monitoring, and to defined trigger-based contingencies in Section 6.

10.3.2 Inspection Frequencies and Protocols

Initial Period (Year 1): Quarterly inspections to establish baseline performance and identify early failure modes for engineered barriers, encapsulated areas, access controls, and housekeeping controls.

Long-Term Period (Years 2 and Beyond):

Semiannual inspections thereafter, with additional inspections triggered by events or conditions that could compromise controls, including severe weather, water intrusion, significant building repairs, or unauthorized access. Each inspection includes, at a minimum, the checklist elements in Section 10.3.2.1.

Annual Comprehensive Inspection Checklist Elements

At least once per year, an inspection shall include a documented review of:

- Warehouse cap integrity and slab integrity at designated control locations
- Encapsulated coating condition and evidence of chipping, peeling, abrasion, or impact damage
- Exterior envelope conditions within the O&M scope, including deteriorated coatings or sealants that could generate debris, and conditions at openings and penetrations that could allow dust migration
- Housekeeping condition in occupied and interface areas, including dust reservoirs at ledges, equipment, and hard-to-clean surfaces
- Restricted-zone access controls, locks, signage, and evidence of unauthorized entry
- O&M records completeness, including corrective actions performed, sampling performed, and any deviations or change-management actions.

10.3.3 Engineered Barrier Maintenance for Warehouse Cap and Building Slab

The warehouse cap and the building slab are treated as engineered barriers that isolate PCB remediation waste and presumed impacted sub-slab materials. The O&M program maintains these barriers through:

- Routine visual inspection for cracking, spalling, delamination, penetrations, or other conditions that could compromise barrier function
- Controls on penetrations, coring, anchoring, saw-cutting, and other intrusive work within barrier footprints and restricted zones. Such activities are permitted only under written procedures consistent with this Plan, with EPA coordination as required by approval conditions
- Prompt repair of barrier defects using methods that restore barrier integrity and prevent dust generation and migration. Repair debris is managed as PCB remediation waste once disturbed unless clearly demonstrated to be a discrete manufactured product waste stream under Section 7.

Sub-Slab Soils Integration:

No routine sub-slab soil sampling is conducted under O&M. Protectiveness for presumed impacted sub-slab materials is demonstrated by maintaining barrier integrity and by indoor air performance confirmation in areas where turnover or routine occupancy occurs.

10.3.4 Encapsulated Coating Monitoring

Encapsulation is an engineered control used only where allowed by the remedy selection logic and where the surface is maintainable under O&M. Encapsulated areas are mapped and tracked. O&M requirements include:

- Periodic inspection for adhesion, damage, wear, and impact points
- Repair procedures for localized failures, including containment and debris controls as needed
- Breakthrough monitoring through inspection and performance confirmation sampling as described in Section 10.3.8
- Encapsulation is not treated as a substitute for verification. Turnover to routine use is based on Section 6 acceptance criteria and VU documentation.

10.3.5 HVAC System Protection, Performance, and Maintenance

HVAC systems are managed to prevent recontamination of served areas and to prevent redistribution of PCB-bearing dust. O&M includes:

- Filter change and maintenance practices consistent with protecting indoor air performance in turnover areas
- Inspection and cleaning practices for accessible dust reservoirs relevant to served areas, as applicable
- Documentation that HVAC work and maintenance do not compromise controls in adjacent restricted zones.

HVAC confirmation wipes and indoor air confirmation are used as performance support tools where required by the verification framework and approval conditions.

10.3.6 Housekeeping and Dust Control

Housekeeping is an ongoing control that reduces secondary reservoirs and recontamination potential.

Housekeeping requirements include:

- Use of methods designed to minimize dust re-entrainment and migration
- Targeted attention to ledges, equipment, ventilation interfaces, and other surfaces prone to dust accumulation
- Documentation of enhanced cleaning utilized as needed, including the enhanced cleaning program previously approved by EPA.

Housekeeping does not create a commitment to routine facility-wide wipe sampling. Wipe and dust sampling are applied as performance confirmation and breakthrough monitoring tools, and under defined triggers.

10.3.7 Management of Restricted Zones

Restricted zones remain closed to routine occupancy and are controlled through enforceable access restrictions and O&M. At a minimum, areas with indoor air detections above EPA Indoor Worker RSLs that EPA identified for low-occupancy restriction remain restricted unless and until high-occupancy criteria are demonstrably achieved with confirmation sampling consistent with Section 6 and applicable TSCA requirements.

10.3.8 Signage, Right-to-Know, and Service Contractor Notification

Signage expectations:

- Post signage at each entry point to Restricted Zones and at each Controlled-Access work area boundary established under this Plan
- Signage will identify the area status (Restricted Zone or Controlled-Access Zone), entry authorization requirements, and key prohibitions, including no routine occupancy and no unapproved intrusive work that could disturb PCB-impacted media or generate PCB waste
- Signage and barriers will be maintained in place and legible for the duration of restricted status or controlled-access conditions and will be evaluated during routine inspections.

Janitorial, maintenance, and short-term service contractor boundaries:

- Janitorial services are not authorized to enter Restricted Zones or Controlled-Access work areas unless specifically approved in writing under this Plan and performed under controlled-access procedures
- Maintenance activities within Restricted Zones or that could disturb known or suspect PCB-impacted media elsewhere in the facility will be performed only by authorized personnel under written procedures consistent with Section 9 controls and Section 7 waste requirements
- Short-term service contractors (including elevator, HVAC, IT, fire protection, and utilities) will be notified of Restricted Zone and Controlled-Access boundaries before mobilization. If access is necessary, they will be escorted or otherwise controlled through documented authorization, boundary controls, and housekeeping requirements appropriate to the task and location

- Any scope change that introduces disturbance of PCB-impacted media or potential PCB waste generation triggers plan-governed work controls and documentation prior to continuing work.

Documentation and recordkeeping linkage to access restriction:

- Maintain an Access Control Log documenting authorized entries into Restricted Zones and Controlled-Access work areas (date, personnel, purpose, escort if applicable, and any observed conditions requiring corrective action)
- Maintain Contractor Notification and Briefing Records for service contractors and maintenance providers, including boundaries communicated, access limitations, and any work-specific controls required
- Maintain Training Records for personnel authorized for controlled access, consistent with the administrative control approach in Section 9 and the site record requirements in Section 13
- Maintain Signage and Barrier Inspection Documentation as part of O&M inspections, including corrective actions where signage, barriers, or access controls are degraded.

Restricted-zone O&M includes:

- Locked access with entry limited to authorized personnel under written procedures
- Signage identifying the restricted-zone status and key prohibitions, including no routine occupancy and no unapproved intrusive work
- Maintenance of engineered barriers and stabilization controls in the restricted zone to prevent releases and migration
- Inspection and documentation of access controls, barrier condition, water intrusion, and visible deterioration.

The North Tower is treated as a closed managed-area zone. Access is limited to inspection and maintenance necessary to preserve enclosure integrity and controls.

10.3.9 Performance Monitoring and Post-Remediation Confirmation Sampling

Performance monitoring demonstrates that engineered controls remain protective and that areas turned over to routine use continue to meet performance expectations.

At a minimum, post-remediation confirmation sampling includes:

- Biannual indoor air sampling in representative turnover areas during the initial performance confirmation period, and thereafter at a frequency consistent with EPA approval conditions and performance history
- Wipe and dust sampling as part of post-remediation confirmation and breakthrough monitoring, at least annually in representative turnover areas and at key interface locations, with increased frequency if triggers are observed (for example evidence of barrier deterioration, unusual dust accumulation, water intrusion, or indoor air results indicating potential recontamination)

- Breakthrough monitoring for engineered controls (caps, encapsulated areas, and other barriers) through documented inspections and, where needed, focused confirmation sampling.

Performance monitoring does not include routine sub-slab sampling. If evidence indicates a credible pathway change related to barrier compromise, corrective actions and confirmation are implemented based on the decision-trigger framework in Section 6.

10.3.10 Corrective Action Procedures

Corrective actions are initiated when inspections or performance monitoring indicate control degradation, breakthrough potential, or a compliance concern. Corrective actions may include:

- Localized repair of engineered barriers or encapsulated areas
- Enhanced housekeeping and dust reservoir control
- Strengthening of access controls or signage
- Targeted additional verification or confirmation sampling consistent with Section 6 triggers
- Coordination with EPA for any material change in conditions affecting the approval basis.

10.3.11 Training and Competency Requirements

Personnel performing O&M inspections, maintenance, housekeeping in controlled areas, or work that could disturb suspect materials shall be trained on:

- Restricted-zone requirements and prohibited activities
- Dust control and decontamination practices
- Waste segregation and routing requirements under Section 7
- Procedures for change-managed intrusive work affecting engineered controls.

10.3.12 Recordkeeping and Reporting

O&M records include:

- Inspection logs and photographs where appropriate
- Maintenance and repair records for barriers, encapsulated areas, and exterior stabilization actions
- Indoor air and confirmation sampling results and data validation summaries
- Documentation of enhanced cleaning utilized as needed
- Waste tracking documentation for any maintenance-generated debris
- Reporting to EPA, including frequency and content, shall be consistent with the §761.61(c) approval conditions.

10.3.13 Compliance with Institutional Controls Instrument

The Owner shall maintain ongoing compliance with recorded ICs by:

- Enforcing restricted-zone access controls and activity restrictions
- Ensuring intrusive activities within engineered-control footprints occur only under written procedures consistent with this Plan and coordinated with EPA as required
- Maintaining required O&M inspections, performance monitoring, and corrective actions
- Updating maps and control documentation if control locations change due to approved work.

The instrument-related bullets below describe the intended enforceable elements and structure for counsel drafting. The final recorded instrument and any incorporated technical attachment will be finalized after remediation outcomes are known and after completion documentation and as-built exhibits are available.

- Record an ICs instrument (e.g., deed notice or environmental covenant, as applicable) that identifies PCB remediation waste that is managed in place or remains onsite, and the engineered controls and managed areas implemented to maintain protectiveness
- Define and map engineered controls and managed areas, including:
 - o The warehouse cap footprint and associated engineered-barrier and access controlled zones.
 - o Restricted zones subject to low-occupancy and controlled-access conditions (at a minimum including the Low Bay and Diesel Shop; and other zones as identified and documented in the Completion Report).
 - o North Tower managed-area closure boundaries.
 - o Encapsulated areas or other engineered controls where PCB remediation waste is managed in place.
- Prohibit routine occupancy of restricted zones by non-authorized personnel, except under controlled-access conditions (authorized personnel only, pursuant to written procedures)
- Require the warehouse cap and building slab to be maintained as engineered barriers and prohibit intrusive activities within engineered-control footprints or restricted zones (including excavation, coring, anchoring, saw-cutting, and penetrations) except where conducted under a written, TSCA-compliant work plan approved or otherwise authorized in accordance with the EPA-approved cleanup and coordinated with EPA to the extent required by approval conditions
- Require that building materials known or reasonably suspected to be PCB-impacted, when disturbed for any purpose, be managed and disposed of in accordance with 40 CFR §761.61 or other applicable TSCA provisions, and any EPA-approved waste management provisions
- Address EPA's exterior pathway concern by providing for periodic inspection and maintenance, as appropriate, of retained exterior coatings or sealants within the O&M scope to minimize the potential for releases, and by applying controlled work practices and compliant waste handling where exterior materials are disturbed

- Define the North Tower as a closed managed area with restricted access and no routine occupancy, with access limited to periodic inspection and maintenance activities, and with material changes in use or intrusive work coordinated with EPA to the extent required under applicable approval conditions
- Provide for a long-term O&M program commensurate with site conditions including inspection, periodic performance monitoring (including biannual indoor air confirmation monitoring during the initial post-remedy period, unless otherwise approved by EPA), recordkeeping, and appropriate corrective action triggers.

10.3.14 Annual Inspections Checklist

The following items will be included in the annual inspection checklist for each area as described.

Engineered Barriers and Intrusive Work Controls

- Warehouse cap condition: cracking, spalling, delamination, penetrations, repairs needed
- Building slab condition in designated control locations: cracks, penetrations, utility chases, signs of deterioration
- Evidence of unauthorized intrusive work in barrier footprints or restricted zones
- Review of any planned intrusive work: confirm written procedures and EPA coordination where required.

Coatings and Encapsulation Condition

- Encapsulated areas: adhesion, peeling, chipping, abrasion points, impact damage, repairs completed
- Paint by location detection areas managed in place: visible deterioration that could generate chips or dust
- Interfaces and edges: penetrations, joints, transitions between treated and managed surfaces

Exterior Materials and Release Prevention

- Exterior coatings or sealants within O&M scope: peeling, chalking, chipping, failed sealants, debris accumulation
- Envelope integrity at openings and penetrations that could allow dust migration indoors
- Evidence of exterior debris release or transport pathways to entrances, louvers, relief openings, and mechanical intakes.

Housekeeping and Dust Reservoir Controls

- Ledges, equipment tops, mechanical interfaces, and other dust reservoir locations in turnover and interface areas
- Adequacy of cleaning methods and frequency for areas with prior impacts
- Documentation that enhanced cleaning is utilized as needed and recorded.

Access Controls and Signage

- Restricted zones: locks operational, signage present and legible, entry log controls functioning
- Evidence of unauthorized access to restricted zones or the North Tower
- Verification that restricted-zone use conditions remain enforced.

Indoor Air and Performance Confirmation

- Confirm required biannual indoor air event(s) were completed for the period, with results reviewed against acceptance criteria
- Confirm wipe and dust sampling performed per the performance monitoring plan, or document basis for any risk-based deferral consistent with approval conditions
- Evaluate whether results indicate potential breakthrough or recontamination, triggering corrective action or targeted confirmation under Section 6 triggers.

Corrective Actions and Documentation

- Review prior-year corrective actions: completion status, effectiveness, and whether re-verification was documented
- Confirm waste documentation for any maintenance-generated debris and that disposal followed Section 7
- Confirm O&M records are complete and retained, with photographs and maps updated where applicable.

11.0 Communications, Submittals, and Change Management

This section describes how communications with EPA Region 7 and other stakeholders will be managed during implementation of this risk-based cleanup, how key submittals will be structured, and how changes to this Plan will be documented and, where appropriate, coordinated with regulators.

11.1 Environmental Protection Agency Coordination

A pre-submittal framework meeting with EPA Region 7 will be used to confirm scope, milestones, and facility-specific verification expectations under EPA's PCB FAST Tool 4 structure. EPA Region 7 will remain the primary regulatory point of contact for TSCA matters under this Plan.

During implementation, the Owner or its designated environmental consultant will provide periodic email or virtual updates to EPA Region 7 during active field phases. These updates are anticipated to occur on a roughly monthly basis during major implementation phases and will summarize status of PCB source control, verification sampling progress, PCB waste classification and shipments, and notable deviations from the approved Plan.

If EPA Region 7 requests additional information or interim documentation, the Owner will respond in writing and will reference the applicable sections of this Plan, the PCB Sampling and Analysis Report, and approved addenda.

11.2 Submittals

Submittals to EPA Region 7 associated with this Plan will follow EPA's PCB FAST Tool 4 structure and will include at minimum the following:

- The final 40 CFR §761.61(c) risk-based cleanup and disposal application package (this document) and approved addenda
- Brief implementation memoranda or field change notices that document variances from the approved Plan where those variances could affect cleanup endpoints, verification coverage, PCB waste classification, or IC boundaries
- A Cleanup Completion Notification and associated Completion Report submitted within 30 days after the final shipment of PCB waste leaves the site for offsite disposal.

The Cleanup Completion Notification and Completion Report will describe completed activities; present figures and tables summarizing building-material cleanup areas and verification results; compile indoor-air, bulk-material, and surface-wipe verification datasets; summarize PCB waste volumes, types, and routing with manifests and certificates of disposal; document decontamination activities; and attach the final O&M Plan and the executed deed restriction or environmental covenant, if required. Underlying records and supporting documentation will be managed in accordance with Section 13.2 - Records Management.

11.3 Change Management and Stakeholder Communication

Implementation of this Plan will follow a structured change management process so that adjustments to sequencing, work methods, or building areas remain consistent with the risk basis approved under 40 CFR §761.61(c).

Field Change Documentation:

During implementation, the Owner or its consultant will prepare short field change notices or implementation memoranda when unexpected conditions or practical constraints require adjustments to the approved Plan. Each document will describe the change, the reason for it, the affected areas or materials, and how the change remains protective and consistent with the cleanup endpoints, verification strategy, and IC framework described in this Plan.

Material Changes Requiring EPA Coordination:

Changes that would expand or materially alter the scope of PCB cleanup in a way that could reduce protectiveness, such as adding new building zones not described in this Plan, substantially reducing verification sampling density, or changing PCB waste classification or disposal routes beyond those anticipated here, will be discussed with EPA Region 7 before implementation, unless EPA's approval specifies a different process.

Tenant and Local Agency Communication:

Building management will coordinate work sequencing, access restrictions, and potential noise or HVAC impacts with MET Center tenants and program operators through advance notices and coordination meetings, consistent with Section 9.0 and the Owner's Worker Protection and Hazard Communication Plan. Coordination with state and local agencies will occur through existing permitting, inspection, and notification processes, including those associated with building, fire, and health codes, where applicable. Notifications related to intrusive work or changes in use that are required under deed restrictions or other instruments will be provided in accordance with Section 10.3.13 - Compliance with Institutional Controls Instrument.

Integration with Records Management:

Change management documents, EPA correspondence, tenant notices, and local agency communications generated under this section will be retained as part of the permanent site file in accordance with Section 13.2 - Records Management.

12.0 Schedule and Milestones

This Plan is submitted as the facility-wide comprehensive remediation work plan requested by EPA in its December 18, 2025 response letter. The schedule in this Section is provided to show logical dependencies between:

1. PCB source control and waste management
2. Verification and performance confirmation
3. Integration with planned renovation activities (including structural repairs/renovations, HVAC replacement, elevator modernization, high-bay structural repairs, and interior improvements). It is not intended to create self-imposed commitments to additional characterization, addenda, or resubmittals beyond what EPA has requested.

With the exception of EPA's stated submittal timeframe, milestone dates are planning targets and will be refined after EPA review, contracting, long-lead procurement, and building access sequencing are confirmed. Where EPA approval conditions establish specific timing or reporting intervals, those conditions will govern.

12.1 Phased Schedule Baseline

The work proceeds in four phases. For scheduling purposes, "Implementation Start" means the first date of intrusive work that disturbs PCB-impacted or suspect PCB-impacted materials under the controls of this Plan.

Phase 0: Work Plan Submittal and EPA Coordination

- Submit this facility-wide remediation work plan within 60 days of EPA's December 18, 2025 letter
- Resolve EPA review comments, if any, through a focused response and document update
- Coordinate with EPA on any approval conditions that affect verification cadence, breakthrough monitoring expectations, and institutional control documentation.

Phase 1: Procurement, Mobilization Planning, and Interim Measures

- Procure long-lead HVAC components
- Procure specialty contractor(s) through LCRA's Request for Proposal process
- Remediation specialty contractor to plan containments, sequencing, and controls that prevent migration and protect new building systems from recontamination
- Implement interim measures and enhanced cleaning where needed to maintain restricted-zone controls and reduce near-term exposure potential, consistent with EPA direction.

Phase 2: Remedy Implementation and Verification by Verification Unit

- Perform PCB source control and related work by VU, coordinated with HVAC replacement, structural repair and renovation work, elevator modernization, high-bay structural repairs, and other interior improvements

- Complete VU-specific verification and turnover decisions using the acceptance criteria and decision logic in Section 6
- Maintain restricted-zone access controls where turnover criteria are not yet met or where areas are designated for long-term managed use.

Phase 3: Completion Documentation, ICs, and O&M Startup

- Finalize and record the deed notice or environmental covenant and any associated maps and use conditions required to manage PCB remediation waste that remains onsite, engineered barriers (warehouse cap, encapsulated areas), and managed areas (North Tower)
- Initiate the O&M and performance monitoring program described in Section 10, including breakthrough monitoring of engineered controls and the indoor air confirmation cadence required by EPA approval conditions
- Submit the completion documentation package to EPA as described in Section 12.2.

Table 12-1. Schedule with Milestone Dates and Dependencies

Milestone	Target Timing	Dependencies	Notes
Submit Facility-Wide Comprehensive Remediation Work Plan (This Plan)	Target: January 12, 2026. No later than February 16, 2026 (60 days from December 18, 2025).	Finalize this Plan and supporting attachments.	This submittal is intended to satisfy EPA's request for a facility-wide comprehensive remediation work plan. No separate sampling addendum is assumed.
EPA Review and Approval or Conditional Approval	January 12, 2026 to March 1, 2026 (estimated).	EPA receives and reviews the work plan submittal.	Respond to EPA information requests within 10 business days unless an alternate schedule is agreed.
Interim Measures and Enhanced Cleaning Documentation	As needed during implementation.	Identification of conditions that warrant interim measures or enhanced cleaning.	Document interim measures consistent with this Plan and EPA direction, including scope, methods, and verification where applicable.
Procurement and Mobilization Planning	Parallel with EPA review, to the extent practicable.	Owner procurement processes and availability of contractors and vendors.	Mobilization planning must maintain controls that prevent dust migration and protect new HVAC components from recontamination.
Begin Intrusive Implementation Work Under Plan Controls	After EPA approval or conditional approval, or as otherwise coordinated with EPA.	EPA approval conditions and any prerequisites (for example, approved work controls and documentation templates).	Coordinate sequence with EPA and implement TSCA-compliant controls, work practices, and documentation.

Milestone	Target Timing	Dependencies	Notes
Verification Unit Turnover Decisions (High-Occupancy Areas)	During implementation, as areas are completed.	Completion of removal, cleaning, and encapsulation work within each Verification Unit.	Turnover is based on Section 6 acceptance criteria and the required documentation and verification results.
Record ICs Instrument	Prior to or concurrent with completion documentation, as required by EPA approval conditions.	Final delineation of managed areas, controlled areas, and restrictions.	Instrument must describe engineered controls, managed areas, and restrictions needed for protectiveness, including North Tower closure requirements.
Submit Completion Documentation Package to EPA	After implementation and turnover verification are complete.	Compilation of required verification results, as-built exhibits, and institutional control documentation.	Submit completion documentation consistent with EPA approval conditions, including notifications, completion reporting, and recordkeeping elements.

12.2 Key PCB Milestones and Submittals

The following milestones and submittals are directly tied to EPA's stated expectations and to the implementation and compliance needs of this Plan:

1. Facility-Wide Remediation Work Plan Submittal
 - Submit this Plan as the facility-wide comprehensive remediation work plan within EPA's requested timeframe
 - Address EPA comments through focused revision of the Plan, limited to items required for EPA approval or conditional approval.
2. Interim Measures and Enhanced Cleaning (As Needed)
 - Utilize enhanced cleaning and interim measures where needed to support restricted-zone controls and to reduce exposure and migration potential, and document these actions in project records and completion documentation.
3. Implementation by Verification Unit (VU)
 - Implement remedy elements by VU, using the Section 5 toolbox and the location-based decision logic tied to paint by location detection, and verify performance using Section 6 acceptance criteria and decision rules.
4. Performance Confirmation and Breakthrough Monitoring
 - Conduct post-remedy confirmation sampling and breakthrough monitoring for engineered controls (encapsulation, caps, managed areas) consistent with Section 6 and Section 10 and consistent with any EPA approval conditions
 - Biannual indoor air confirmation is performed in turnover areas during the initial performance confirmation period or as otherwise required by EPA approval conditions. Wipe

and dust-reservoir confirmation (as applicable to the remedy and O&M elements) is used to document control of recontamination pathways.

5. ICs and O&M Startup

- Finalize and record the ICs instrument and initiate the O&M program, including inspection, maintenance, and performance monitoring requirements for engineered controls and managed areas (including the North Tower).

6. Completion Documentation Package

- Provide EPA with the completion documentation package required by the approval conditions, including verification summaries, waste documentation, institutional control recording documentation, and O&M initiation records.

Table 12-2. Regulatory Submittals and Status

Submittal	Purpose	Status	Timing
Facility-Wide Comprehensive Remediation Work Plan (this Plan)	Provide the facility-wide comprehensive plan addressing sources, pathways, controls, verification, waste management, and ICs under 40 CFR §761.61(c).	Complete	Submission January 12, 2026. No later than 60 days of EPA letter dated December 18, 2025 (by February 16, 2026).
Focused Response and Revision to Address EPA Comments	Address EPA review comments and incorporate requested revisions into the final approved Plan.	To be prepared if EPA issues comments.	After EPA review, per EPA schedule.
ICs Instrument (Deed Notice or Environmental Covenant)	Record enforceable restrictions, managed areas, engineered controls, and stewardship obligations needed for protectiveness.	To be prepared.	As required by EPA approval conditions, prior to or concurrent with completion documentation.
Completion Documentation Package (Completion Report or Notification)	Document completed work, verification results, as-built exhibits, waste disposal documentation, and ICs consistent with EPA approval conditions.	To be prepared.	After implementation and required verification, per EPA approval conditions.
Optional Targeted Sampling Memorandum	Document limited, decision-support sampling performed to resolve a change-management trigger, support a turnover decision, or address an EPA-coordinated decision point.	Optional as needed.	Only if a targeted sampling need is identified and coordinated with EPA prior to sampling.

Submittal	Purpose	Status	Timing
Change-Management Submittal to EPA	Coordinate intrusive work or scope changes when change-management triggers occur (for example, discovery of new pathways or a planned breach of a managed barrier).	Optional as needed.	Only if a change-management trigger occurs, prior to the action.

12.3 Critical Path and Contingencies

The primary critical-path drivers are long-lead HVAC procurement, containment throughput, access sequencing in an operating facility, and the time required to complete verification and resolve any exceedances identified during turnover verification.

This Plan does not commit to broad supplemental characterization, a separate sampling addendum, or automatic resubmittal sequencing. Additional sampling, if any, is limited to the conditional, decision-triggered contingencies defined in Section 6 and is coordinated with EPA when the purpose is to support an EPA decision point, to address an inconclusive result, or to respond to a defined breakthrough or change-management trigger. If extraordinary field conditions or EPA review timing materially affect the planning targets, the Owner will coordinate schedule adjustments with EPA while maintaining the cleanup performance standards and control framework described in this Plan.

13.0 Roles, Responsibilities, and Recordkeeping

13.1 Responsibilities

The Owner is responsible for overall TSCA compliance, implementation of this Plan, communication with EPA (directly or through a designated representative), and execution and long-term administration of deed instruments and ICs.

The cleanup contractor is responsible for means and methods, containments, removal and cleaning activities, chain of custody, data validation, verification planning, waste packaging and shipment consistent with this Plan, housekeeping, field quality control, and daily reporting to the Owner and the Owner's environmental representative.

The environmental consultant is responsible for sampling design, oversight of field implementation as the owner's representative, regulatory interpretation support, and preparation or technical review of submittals and reports under this Plan.

13.2 Records Management

A project file will be maintained as part of the permanent site record, including the sampling and analysis plan, standard operating procedures, instrument calibration records, chain of custody forms, laboratory reports, quality control summaries, photo logs, field notebooks, daily reports, field change notices, manifests, training records, and the inspection, monitoring, and correspondence records described in Section 10.3.12 - Record Keeping and Reporting.

Records supporting the certification required by 40 CFR §761.61(a)(3)(i)(E) will be retained by the Owner for at least 3 years after completion of cleanup activities and for the duration of applicable ICs and will be made available to EPA upon request.

14.0 REFERENCES

1. Environmental Works, Inc. (EWI). PCB Sampling and Analysis Plan (SAP), MET Center, Wellston (St. Louis County), Missouri, January 2025.
2. Environmental Works, Inc. (EWI). PCB Sampling and Analysis Report, MET Center, Wellston (St. Louis County), Missouri, July 2025.
3. Environmental Works, Inc. (EWI). MET Center PCB Protocol (DRAFT), September 2025.
4. U.S. Environmental Protection Agency (EPA). Code of Federal Regulations, Title 40, Part 761, Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions (including §761.3, §761.61, §761.62, §761.65, §761.79, and §761.123), current edition.
5. U.S. Environmental Protection Agency (EPA). PCB Facility Approval Streamlining Toolbox (FAST), Tool 4 (Risk-Based Cleanup and Disposal Approval Under 40 CFR §761.61(c)), 2017.
6. U.S. Environmental Protection Agency (EPA). Principles for Greener Cleanups, current edition.
7. U.S. Environmental Protection Agency (EPA). Regional Screening Levels (RSLs) for Chemical Contaminants at Superfund Sites, current edition.
8. U.S. Environmental Protection Agency (EPA). Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846), Method 8082A, Polychlorinated Biphenyls (PCBs) by Gas Chromatography, current edition.
9. U.S. Environmental Protection Agency (EPA). Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air, Method TO-4A and Method TO-10A, current edition.
10. U.S. Environmental Protection Agency (EPA). Interpretation regarding PCB bulk product waste and building substrates when PCB bulk product remains adhered at the time of designation for disposal (bulk product waste reinterpretation), 2012.
11. U.S. Environmental Protection Agency (EPA), Region 7. Correspondence dated March 23, 2000 regarding PCB conditions and controls at the MET Center.
12. U.S. Environmental Protection Agency (EPA), Region 7. Request for Information letter dated September 23, 2024 regarding TSCA building characterization at the MET Center.
13. U.S. Environmental Protection Agency (EPA), Region 7. Conditional approval correspondence dated November 12, 2024 regarding indoor air sampling and required building materials assessment.
14. U.S. Environmental Protection Agency (EPA), Region 7. Correspondence dated December 18, 2025 regarding the MET Center and EPA review and coordination expectations for the TSCA submittal.

EXHIBITS

Exhibit E.

Technical Attachment to Environmental Covenant (Draft)

Exhibit E-A.

Plan-Scale Exhibit: Warehouse Cap and Barrier-Controlled Areas (Available upon request during EPA review; not attached to initial Plan submittal)

Exhibit E-B.

Plan-Scale Exhibit: North Tower Managed Area Boundary (Available upon request during EPA review; not attached to initial Plan submittal)

Exhibit E-C.

As-Built Exhibit: Encapsulated Areas and Controlled Surfaces Inventory (To be Provided with Completion Documentation)

Exhibit E.

Technical Attachment to Environmental Covenant - DRAFT MET Center PCB Engineered Controls, Use Restrictions, and O&M Requirements Property: MET Center, 6347 Plymouth Avenue, Wellston/St. Louis County, Missouri

This Technical Attachment is provided in draft form as part of this Plan to illustrate the intended technical scope and enforceable structure of the institutional controls (ICs). The final recorded instrument and any incorporated technical attachment will be finalized after remedy implementation based on the Completion Report and as-built exhibits, and in accordance with EPA approval conditions.

North Tower provisions are permanent no-occupancy controls; North Tower data are used only to define North Tower containment and IC obligations and are not used to set cleanup standards elsewhere at the Property. This Technical Attachment is intended to be incorporated by reference into an Environmental Covenant or similar ICs Instrument (Instrument). This Technical Attachment provides the technical scope, controlled areas, activity restrictions, engineered control obligations, and stewardship requirements necessary to maintain protectiveness and TSCA compliance as set forth in the EPA-approved 40 CFR §761.61(c) risk-based cleanup plan for the Property.

1.0 Purpose and Applicability

1.1 Purpose

The purpose of this Technical Attachment is to establish enforceable, implementable technical requirements to maintain protectiveness where PCB remediation waste remains in place and is managed through engineered controls, controlled access, and operations and maintenance (O&M).

1.2 Applicability

The requirements in this Technical Attachment apply to all persons and entities bound by the Instrument, including the Owner and any successors, assigns, tenants, operators, contractors, and other persons conducting activities on the Property.

1.3 Governing Cleanup Plan

This Technical Attachment is based on, and shall be implemented consistent with, the EPA-approved risk-based cleanup and disposal plan under 40 CFR §761.61(c) (EPA-Approved Cleanup Plan). Where the EPA-Approved Cleanup Plan includes approval conditions, those approval conditions govern implementation and reporting.

2.0 Defined Terms

For purposes of the Instrument and this Technical Attachment, the following terms apply.

2.1 As-Built Exhibits

The final record drawings and location-indexed inventories prepared following completion of work that document the final boundaries and locations of engineered controls, including encapsulated areas and any repaired or modified cap areas.

2.2 Change-Managed Activity

Any activity that could compromise an Engineered Control, disturb Controlled Materials, change Controlled Area boundaries, or create a new exposure pathway, including Intrusive Work in Controlled Areas.

2.3 Controlled Areas

Collectively, the areas on the Property subject to restrictions and obligations under the Instrument, including the Warehouse Cap Area, North Tower Managed Area, Encapsulated Areas, Restricted Zones, and any additional barrier-controlled areas identified in the Stewardship Record consistent with the EPA-Approved Cleanup Plan.

2.4 Controlled Materials

Materials that are known or reasonably suspected to be PCB-impacted and that are managed under the EPA-Approved Cleanup Plan, including PCB remediation waste that remains in place under Engineered Controls or within Controlled Areas.

2.5 Engineered Controls

Physical controls used to isolate, contain, or prevent exposure to Controlled Materials, including but not limited to the existing warehouse floor cap, building slabs functioning as barriers to presumed impacted sub-slab materials, encapsulation systems, and physical isolation features used to maintain the North Tower Managed Area.

2.6 Encapsulated Areas

Locations where encapsulation is used as an Engineered Control pursuant to the EPA-Approved Cleanup Plan.

2.7 EPA

United States Environmental Protection Agency, Region 7, or its successor agency.

2.8 EPA-Approved Cleanup Plan

The EPA-approved facility-wide risk-based cleanup and disposal plan submitted under 40 CFR §761.61(c), including any EPA approval conditions and any EPA-approved updates.

2.9 Intrusive Work

Activities that penetrate, breach, or remove an Engineered Control or otherwise disturb Controlled Materials, including excavation, coring, saw-cutting, drilling, trenching, anchoring, utility penetrations, demolition, and any similar intrusive construction or maintenance activities.

2.10 North Tower Managed Area

The North Tower area that is permanently restricted from occupancy and managed as a closed, restricted-access area under the Instrument and the O&M Program.

2.11 O&M Program

The O&M program required by the EPA-Approved Cleanup Plan and approval conditions, including inspections, maintenance, housekeeping controls where applicable, performance confirmation monitoring, recordkeeping, and corrective action procedures.

2.12 Performance Confirmation Monitoring

Monitoring and sampling performed to confirm that Engineered Controls and remedy elements remain protective, including indoor air confirmation and breakthrough monitoring required by EPA approval conditions and the EPA-Approved Cleanup Plan. Performance Confirmation Monitoring does not include routine sub-slab soil characterization.

2.13 Restricted Zones

Areas subject to controlled access and use limitations under the EPA-Approved Cleanup Plan and recorded in the Stewardship Record, where routine occupancy is prohibited or limited to authorized controlled access.

2.14 Stewardship Record

The set of records maintained by the Owner to document ongoing compliance with the Instrument and O&M Program, including the Exhibits listed in Section 3, As-Built Exhibits, inspection and maintenance logs, corrective action records, and any performance monitoring documentation.

2.15 TSCA

The Toxic Substances Control Act and implementing regulations at 40 CFR Part 761.

2.16 Warehouse Cap Area

The warehouse floor cap footprint and related barrier-controlled areas identified on Exhibit E-A.

3.0 Exhibits and Technical Reference Documents

3.1 Exhibit List

The following Exhibits are incorporated into the Instrument and this Technical Attachment:

Exhibit E-A. Warehouse Cap and Barrier-Controlled Areas (Plan-Scale Exhibit for EPA Review)

Exhibit E-B. North Tower Managed Area Boundary (Plan-Scale Exhibit for EPA Review)

Exhibit E-C. Encapsulated Areas and Controlled Surfaces Inventory (As-Built Exhibit to Be Provided in Completion Documentation)

3.2 Plan-Scale Exhibits and As-Built Finalization

Exhibits E-A and E-B are provided at plan scale for EPA review and implementation planning. Encapsulation locations and extents are field-selected under the performance-based remedy framework and cannot be fully defined until work is complete. Exhibit E-C shall be finalized as an As-Built Exhibit package with a location-indexed inventory log following completion of work and shall be maintained in the Stewardship Record and provided to EPA as part of completion documentation required by EPA approval conditions.

Exhibits E-A and E-B are not attached to the initial 40 CFR §761.61(c) submittal; plan-scale draft exhibits are available upon request during EPA review and may be used for implementation planning.

3.3 No Survey-Grade Mapping Commitment

This Technical Attachment does not require survey-grade mapping for initial submittal. Where As-Built Exhibits are prepared, they shall be sufficiently accurate and unambiguous to support enforceability and long-term stewardship.

4.0 General Use Restrictions and Activity Controls

4.1 Prohibition on Uncontrolled Disturbance

No person shall disturb Controlled Materials or compromise Engineered Controls except as allowed under a written work plan or procedure that is consistent with the EPA-Approved Cleanup Plan and the O&M Program, and that includes appropriate TSCA-compliant controls and waste management provisions.

4.2 Waste Management for Disturbed Materials

Any Controlled Materials that are disturbed or removed for any purpose shall be managed and disposed in compliance with TSCA and the EPA-Approved Cleanup Plan, including applicable waste segregation and routing requirements.

4.3 No Reclassification by Sampling

Sampling and analytical results, if collected for a defined decision purpose, may be used to support implementation and stewardship decisions but do not change TSCA waste definitions or the applicability of restrictions and obligations in the Instrument.

4.4 Notice and Coordination for Change-Managed Activities

The Owner shall implement Change-Managed Activities only in accordance with the EPA-Approved Cleanup Plan and any EPA approval conditions that require EPA coordination or notification for specific actions.

5.0 Engineered Control Specific Requirements

5.1 Warehouse Cap Area

5.1.1 Cap Integrity Requirement

The Warehouse Cap Area identified on Exhibit E-A shall be maintained as an Engineered Control. The Owner shall maintain the cap in a condition that preserves its barrier function.

5.1.2 Prohibited Activities

Intrusive Work within the Warehouse Cap Area is prohibited unless performed under a written work plan consistent with the EPA-Approved Cleanup Plan and the O&M Program.

5.1.3 Repair Documentation

Cap repairs or modifications shall be documented in the Stewardship Record. If repairs or modifications change the effective cap footprint, the Owner shall document the final repaired or modified footprint in the As-Built Exhibits and include it in completion documentation required by EPA approval conditions.

5.2 Building Slab Barrier Areas and Presumed Impacted Sub-Slab Materials

5.2.1 Presumption and Control

Localized sub-slab materials beneath building slabs are presumed to have the potential for PCB impacts based on site history and EPA direction. Building slabs function as Engineered Controls that isolate these materials. This Technical Attachment does not require routine sub-slab soil sampling.

5.2.2 Intrusive Work Controls

Intrusive Work that penetrates or compromises the slab within Controlled Areas, or that could create a pathway from presumed impacted sub-slab materials to indoor receptor zones, is prohibited unless performed under a written work plan consistent with the EPA-Approved Cleanup Plan and O&M Program.

5.2.3 Barrier Integrity Inspections

The Owner shall implement periodic inspections of slab integrity at designated control locations as part of the O&M Program and shall implement corrective actions where needed to preserve barrier function.

5.3 Encapsulated Areas

5.3.1 Encapsulation as an Engineered Control

Where encapsulation is used pursuant to the EPA-Approved Cleanup Plan, Encapsulated Areas are Engineered Controls that shall be maintained to preserve adhesion and integrity and to prevent deterioration that could generate debris or dust.

5.3.2 Encapsulation Inventory and As-Built Documentation

Encapsulated Areas shall be documented in Exhibit E-C as an As-Built Exhibit package with a location-indexed inventory log. The Owner shall maintain Exhibit E-C in the Stewardship Record.

5.3.3 Prohibition on Uncontrolled Disturbance

No person shall sand, grind, blast, abrade, remove, or otherwise disturb encapsulated surfaces except under a written procedure consistent with the EPA-Approved Cleanup Plan and the O&M Program.

5.3.4 Repair and Waste Handling

Repairs to encapsulated surfaces shall be performed under controls appropriate to prevent debris migration and to ensure compliant management of any disturbed materials. Repair debris and residues shall be managed in accordance with TSCA and the EPA-Approved Cleanup Plan.

5.4 North Tower Managed Area

5.4.1 Permanent No-Occupancy Restriction

Routine occupancy of the North Tower Managed Area identified on Exhibit E-B is prohibited.

5.4.2 Access Restriction

Access is limited to authorized inspection and maintenance personnel performing activities necessary to preserve physical security and enclosure integrity, and such activities shall be performed under written procedures consistent with the O&M Program.

5.4.3 Prohibited Intrusive Work and Status Change

Intrusive Work, demolition, renovation, or change in use status within the North Tower Managed Area is prohibited unless implemented consistent with the EPA-Approved Cleanup Plan and coordinated with EPA as required by EPA approval conditions.

5.4.4 North Tower Scope Limitation

North Tower conditions and data are managed as North Tower-specific controls and do not establish cleanup endpoints or standards for other building areas.

5.5 Restricted Zones

5.5.1 Restricted Use

Restricted Zones are subject to controlled access and use limitations. Routine occupancy is prohibited except as allowed under written controlled access procedures consistent with the O&M Program.

5.5.2 Access Controls

The Owner shall maintain locks, signage, and controlled access procedures for Restricted Zones and shall document compliance consistent with the O&M Program.

5.5.3 Disturbance Controls

Any activity in Restricted Zones that disturbs Controlled Materials shall be conducted under controls consistent with the EPA-Approved Cleanup Plan and shall include compliant waste management.

6.0 O&M Program Requirements

6.1 O&M Program Implementation

The Owner shall implement and maintain an O&M Program consistent with the EPA-Approved Cleanup Plan and EPA approval conditions. The O&M Program applies to all Controlled Areas and Engineered Controls.

6.2 Inspection

Inspections shall be performed at a frequency and scope consistent with the EPA-Approved Cleanup Plan and approval conditions. At a minimum, inspections shall address Engineered Control integrity, Encapsulated Area condition, access controls, housekeeping and dust reservoir controls where applicable, and conditions that could affect protectiveness.

6.3 Performance Confirmation Monitoring

Performance Confirmation Monitoring shall be conducted as required by the EPA-Approved Cleanup Plan and EPA approval conditions. This Technical Attachment does not create a standing obligation for facility-wide supplemental characterization or routine sub-slab sampling.

6.4 Corrective Actions

If inspections or Performance Confirmation Monitoring indicate a condition that could compromise protectiveness, the Owner shall implement corrective actions consistent with the EPA-Approved Cleanup Plan and shall document actions taken in the Stewardship Record.

6.5 Recordkeeping

The Owner shall maintain the Stewardship Record and make it available to EPA upon request, consistent with EPA approval conditions.

7.0 Exhibit Maintenance and Updates

7.1 As-Built Exhibits

As-Built Exhibits documenting final engineered control boundaries and Encapsulated Areas shall be prepared following completion of work and maintained in the Stewardship Record. Exhibit E-C shall be finalized as part of the As-Built Exhibits.

7.2 Updates and Amendments

If Controlled Area boundaries or Engineered Control locations change due to approved work, the Owner shall update the As-Built Exhibits and Stewardship Record. If the Instrument requires recorded amendments for exhibit changes, counsel shall implement the appropriate amendment mechanism consistent with the Instrument and EPA approval conditions.

8.0 Enforcement and Interpretation

8.1 No Expansion of Obligations

This Technical Attachment shall be interpreted to maintain protectiveness and TSCA compliance consistent with the EPA-Approved Cleanup Plan, without creating commitments to new characterization programs, additional phases of investigation, or survey-grade mapping as prerequisites to implementation.

8.2 Conflicts

If a conflict exists between this Technical Attachment and the EPA-Approved Cleanup Plan or EPA approval conditions, the EPA-Approved Cleanup Plan and approval conditions control.

APPENDIX A
PCB SAMPLING AND ANALYSIS REPORT (EWI, JULY 2025)

*NOTE: LOCATED IN EXHIBIT B OF RFP

Exhibit B - Site Characterization and Supporting Data Package

The following documents are provided as Exhibit B:

- PCB Sampling and Analysis Report (EWI, July 2025), includes data summary tables and figures relevant to PCB-impacted building materials, dust reservoirs, indoor air, and cap evaluation
- Site plans showing functional zones and sampling locations referenced in the Cleanup Plan, for use in developing proposed Verification Unit boundaries
- EWI Hazardous Building Materials Report (November 2025), provided for ACM/LBP identification, reported material locations, and multi-hazard work planning where ACM or LBP may be encountered in connection with the Work.



PCB SAMPLING AND ANALYSIS REPORT

**METROPOLITAN EDUCATION AND TRAINING (MET) CENTER
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MISSOURI 63133**

Prepared For:

St. Louis Economic Development Partnership &
Land Clearance for Redevelopment Authority
St. Louis, Missouri

Prepared By:

Environmental Works, Inc.

July 22, 2025

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1.0 EXECUTIVE SUMMARY

EWI prepared this report to describe the procedures and findings from the investigation of polychlorinated biphenyls (PCBs) at the Metropolitan and Education Training (MET) Center building addressed at 6347 Plymouth Avenue, Wellston, Missouri (the Site). Sampling activities were conducted in accordance with the PCB Sampling and Analysis Plan (SAP) dated January 2025 approved by EPA on April 4, 2025.

The MET Center is occupied by multiple tenants who provide workforce training and placement and career development services. The building includes a six-story "office" and a vaulted warehouse which is divided into "high bay" and "low bay". The northeast corner of the low bay is further classified as the "diesel shop". The Site also includes the abandoned and unoccupied "north tower" consisting of five stories. Currently, employees and visitors primarily occupy the office on the first and third floors. The office spaces on the second and fifth floors are partially occupied while the fourth and sixth floors are vacant. The high bay, low bay (including the diesel shop), and north tower are currently unoccupied and restricted for access.

This report summarizes two (2) seasonal rounds of indoor air testing performed on February 11, 2025 and May 19, 2025 and the investigation of building materials, concrete floor coring, and a fluorescent light ballast (FLB) inventory which were conducted from May 20 – 23, 2025. Sampled media included brick, mortar, cinder block, concrete, caulking, floor tile, spray-on insulation, paint and dust.

The following table briefly summarizes where PCBs have been identified in the building in exceedance of EPA Cleanup Levels:

Summary of PCB Results by Area				
Homogenous Area	Occupancy	Materials with PCBs above Cleanup Level	FLBs Suspect for PCBs	Indoor Air detected with PCBs
Low Bay	Unoccupied, restricted for access	Expansion joint, floor tile, drywall and concrete ceilings, paint on concrete pillars, paint on metal cross beams and ceiling of #9A, paint on vertical I-beams, paint on brick wall	Yes	Yes – detected during May 2025 event
Diesel Shop	Unoccupied,	Insulation, paint on	Yes	Yes – detected

	restricted for access	vertical I-beams, paint on brick wall, dust on air ducts		during May 2025 event
High Bay	Unoccupied, limited access and low occupancy	Concrete column, expansion joint, paint vertical I-beams, paint on concrete columns and paint on brick wall	No	No
Office	Office tenants (7am-4pm); occupy 1 st & 3 rd , partially occupy 2 nd & 5 th ; not present on 4 th & 6 th	Paint on concrete pillars (2 nd floor), paint on plaster walls (6 th floor), concrete floor (1 st floor)	No	No
North Tower	Unoccupied, restricted for access	Concrete surfacing, concrete ceiling, window caulking, wall paint, paint on stair riser, paint on stair rail, paint on concrete pillars, ceiling paint, and elevator oil staining	N/A	Not sampled

Based on findings from this investigation, PCBs were detected above EPA Cleanup Levels in various media throughout the Site. The majority of PCB detections were found in paint and largely located within the unoccupied and restricted north tower, high and low bays, and diesel shop. In office areas, PCB detections were limited to concrete floor on the 1st floor, pillar paint on the partially occupied 2nd floor, and plaster wall paint on the unoccupied 6th floor.

2.0 INTRODUCTION

EWI was retained by St. Louis Economic Development Partnership and Land Clearance for Redevelopment Authority (LCRA) (the Client) to conduct sampling activities at the MET Center addressed at 6347 Plymouth Avenue, Wellston, Missouri (**Figure 1.0**). The work was performed in collaboration with the United States Environmental Protection Agency (EPA) Region 7 PCB Program to assure compliance with Toxic Substances Control Act (TSCA) regulations. The work was also conducted in accordance with the SAP dated January 2025 approved by EPA on April 4, 2025.

2.1 Site History and Description

The Site is occupied by an approximately 95,000 square foot (ft²) building identified as the MET Center. The MET Center is occupied by multiple tenants who provide workforce training and placement and career development services. The MET Center includes a six-story "office" and a vaulted warehouse which is divided into "high bay" and "low bay". The northeast corner of the low bay is further classified as the "diesel shop". The Site also includes the abandoned and unoccupied "north tower" consisting of four stories and approximately 5,200 ft² adjacent to the MET Center on the northwest corner. Currently, employees and visitors primarily occupy the office spaces on the first and third floors. The office spaces on the second and fifth floors are partially occupied while the fourth and sixth floors are vacant. The high bay, low bay (including the diesel shop), and north tower are currently unoccupied and restricted for access. These areas are identified on **Figure 2.0**.

2.2 Background

The MET Center (Site) was previously a portion of an approximately 55-acre industrial complex occupied by Wagner Electric (Wagner) for the manufacturing of electrical transformers, motors, components and brake linings from the early 1900's until decommission in 1982. The Site was identified as "Building 9" which was used for the manufacturing and assembly of electrical transformers known to contain PCBs. PCBs were reportedly distributed via piping to Building 9 from former PCB storage tanks located east of the building (current day parking lot).

EWI was contracted by the Client to conduct a file search for the Site which included an internal document review and records requests submitted to EPA and Missouri Department of Natural Resources (MoDNR) on May 9, 2024. Pertinent documentation which has been received by relevant agencies and review to date is summarized below.

EPA was notified in April 1983 of possible PCB contamination at Wagner and conducted an inspection in May 1983 which resulted in TSCA violations and fines against the former owners. Not long after, the Wagner complex was donated to LCRA/St. Louis County (the Client) as part of an area-wide development project known as the "Wagner Reuse Project". A recommendation from the demolition contractor led LCRA to contract with an independent consulting firm, Sitex Corporation, to investigate possible contamination.

EWI reviewed a Hazardous Waste Management Plan produced by Sitex Corporation dated July 25, 1984. The Hazardous Waste Management Plan was developed to summarize the presence of hazardous and toxic materials at the Wagner Reuse Project and recommend procedures for disposal of materials identified. The Client, on recommendation of EPA, undertook cleanup of the contaminated property and through correspondence with EPA Region 7 AWRM/TOPE, several months of sampling and remediation occurred. These efforts were conducted by O.H. Materials Company in September 1984 which included the scraping of floors within Building 9 for composite analysis of Aroclor 1260. Concentrations of Aroclor 1260 ranged from 600 parts per million (ppm) on the south side of the building to 32,400 ppm on the north side of the building. Room 9A, previously located on the east side of the building, was sampled separately with a composite concentration of 94,800 ppm.

A Phase II remediation event was conducted by O.H. Materials Company in December 1984 which involved the use of a scarifier to remove hard encrusted material on the concrete floors. A surfactant/water mixture was applied to the floors with bristle brooms and a high-pressure water washer was used. The wash and rinse water were contained, recovered by a vacuum unit and discharged to an on-site treatment system. The treatment system included flocculation/clarification, multimedia filtration and carbon absorption. The water was then discharged to the Metropolitan St. Louis Sewer District after analysis indicated "minimal" acceptable parts per billion (ppb) amounts of PCBs. A confirmation sample was collected from the floors after cleaning which detected Aroclor 1260 at 400 ppm. As a result of these efforts and funds spent to date, the Client met with EPA in February 1985 to discuss problems at the Site. A meeting was conducted with EPA and the LCRA in February 1985 to determine whether the Site would apply under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

EPA performed an Immediate Removal Action Assessment dated March 6, 1985 which determined areas of concern at the Wagner Reuse Project. EPA issued a consent order to Wagner Electric which led to additional sampling and a remedial action plan under guidance of EPA CERCLA Superfund on July 2, 1985.

EWI reviewed several investigations and remedial work plans carried out by Cooper Industries for the Wagner Reuse Project under EPA oversight. A Final Report was issued on January 22, 1988 which summarizes work performed under the consent order. As a remedy to the high levels of PCBs within Building 9, portions of the building were cleaned with surfactant, shot-blasted and sealed with an epoxy flooring system. The area of the former PCB storage tanks located east of the building was excavated and backfilled with clean soil. Based on the remedial activities performed, the consent order was closed by EPA CERCLA Superfund in a letter dated January 17, 1989.

The Client provided an additional letter from EPA Region 7 dated March 23, 2000. The letter summarizes conclusions from a meeting which occurred between EPA, MoDNR, U.S. Department of Commerce, Economic Development Agency (EDA) and the St. Louis County Economic Development Council in September 1999. The purpose of the meeting was to discuss the future of the facility and to evaluate the use restrictions imposed after CERCLA closure. Reportedly, the floor was sealed with a two-part epoxy resin since the action level for PCBs could not be attained in the concrete floor. This letter also indicates "total renovation" of Building 9 including capping of the floor with several inches of concrete was also completed. EPA states in a letter that residual PCB contamination in the building floors was the primary reason for imposing land use restrictions. Residential use of the facility should not be considered and the structures should not be used for childcare or food preparation activities. No additional reference or documentation of institutional controls or deed restriction on the building has been identified to date.

The Client also provided several files related to a Voluntary Cleanup Investigation (VCP) at the Wagner Reuse Project – documented as Plymouth Industrial Complex from approximately 2000 to 2004. Exhibits documenting VCP boundaries exclude the footprint of the Site. In addition, the Final Report of Remedial Actions dated September 13, 2004 states that the MET Center building was excluded from VCP activities.

In response to this records review, EWI contacted EPA to determine whether the CERCLA closure actions in 1989 would still be considered viable. An initial framework meeting was conducted with EPA and additional testing was requested. In response, EWI submitted a PCB Indoor Air Sampling Work Plan including a summary of Site documentation reviewed to date on behalf of the Client on September 17, 2024. A request for information letter was issued by EPA on September 23, 2024 regarding the date, nature, location and extent of PCB contamination.

On October 29, 2024, a Site walkthrough was performed by Ms. Annah Murray, Region 7 PCB Coordination, who was accompanied by representatives of EWI and the Client. As part of the visit, Ms. Murray identified various potential PCB sources throughout the building. The Client received a Conditional

Approval of the PCB Indoor Air Sampling Work Plan from EPA on November 13, 2024 which included a request for a building materials assessment and sampling and additional considerations for the proposed indoor air sampling. EWI submitted a revised PCB Sampling and Analysis Plan in January 2025 which received EPA approval on April 4, 2025.

2.3 Objective

The objective of this report is to provide the results of the data collected to characterize potential sources and the extent of PCB contamination to support an application for PCB cleaning meeting all applicable requirements of TSCA. Sampled media included brick, mortar, cinder block, concrete, caulking, floor tile, spray-on insulation, paint and dust. Indoor air sampling was also conducted to establish safe occupancy of the Site.

3.0 INVESTIGATIVE ACTIVITIES

The investigative activities were conducted in accordance with the approved SAP. This report summarizes two (2) seasonal rounds of indoor air testing performed on February 11, 2025 and May 19, 2025 and the investigation of building materials, concrete floor coring, and a FLB inventory which were conducted from May 20 – 23, 2025. In addition, EWI conducted a suspect building materials inventory which is included as **Table 1**.

No significant deviations from the approved SAP were noted, aside from minimal deviations discussed in the sections below.

3.1 Indoor Air

Indoor air sampling was conducted to establish safe occupancy of the office tower and north warehouse. Sample locations were pre-selected and approved based on conditions representative of worker occupancy and potential variations in ventilation throughout the building. Currently, the office tower is equipped with a fully integrated heating, ventilation and air conditioning system (HVAC). The classrooms in the high bay are equipped with separate split HVAC systems. Offices within the diesel shop are equipped with individual wall-mounted A/C units. The operational status, connectivity and usage of various HVAC system components are not fully understood by EWI based on documents and other information provided by the client. Indoor air sample locations are documented on **Figures 2.0 – 2.5**.

Both indoor air sampling events were conducted in accordance with the approved SAP; however, several modifications were implemented during the May 2025 sampling event due to limitations encountered in the initial sampling. The following adjustments were made to increase sample volume and ensure laboratory reporting limits could be achieved:

- The sampling flow rate was increased from 3.5 liters per min (L/min) in February 2025 to 4 L/min in May 2025;
- The sampling duration was increased from 8 hours to approximately 12 hours; and
- A different analytical laboratory, EMSL Analytical, Inc., was selected.

In addition, the duplicate sample broke during sampling in the May 2025 event. This sample could not be submitted for analysis.

3.2 Concrete Floors

Coring and discrete sampling of concrete floors was conducted according to the scope of work approved in the SAP. Four (4) targeted areas were sampled: Building 9A – small transformer assembly area, large transformer assembly area, south end of warehouse and the first floor office space. The two transformer assembly areas were divided into four 10' x 10' grid cells following Subpart N methods. A core penetration of approximately 4 inches (10 cm) was advanced within each grid cell. A single core of approximately 4 inches (10 cm) was also advanced in the south warehouse area. These cores were installed in the assumed capped portions of the concrete floor and segmented into three samples for discrete analysis: 0.5 to 2 cm (surface sample), 4 to 6 cm (near surface/approximate middle of cap); and 8 to 10 cm (base of core/source area). Each sample was analyzed to evaluate the vertical profile of contamination and potential upward migration from near the original floor surface beneath the cap.

A single concrete core was also advanced in the mechanical closet of the first floor office area, which is believed to be outside the concrete cap area. The core was completed to approximately 4 inches (10 cm) and was segmented into three samples: 0.5 to 2 cm (surface sample); 4 to 6 cm (near surface sample); and 6 to 8 cm (anticipated base of core).

Each core was assessed for visual evidence of the sealant and concrete thickness. Concrete floor cores are documented on **Figure 3.0**.

3.3 Building Materials Inventory and Sampling

Prior to building materials sampling, EWI developed a suspect building materials inventory derived from materials identified in the EPA Conditional Approval letter. These building materials were further divided into homogenous sampling areas based on construction history, material type, and historical use patterns. Three (3) samples of each homogenous bulk material were collected according to Subpart N of the PCB Regulations found at 40 CFR 761.260 – 761.274.

Each sample was assigned a unique identifier based on the following naming convention:
[Material Type] – [Location or Homogenous Area] – [Material Number] – [Sample Number]

For example, CK-NT-1-1 represents:

- CK: Material type (i.e. caulk)
- NT: General location or homogenous area (i.e. north tower)
- 1: Homogenous material number (i.e. the first distinct type of caulk observed in that area)

- 1: Sample number (i.e. the first sample collected from that specific homogenous material)

The unique identifiers for each sample and associated sample locations are documented on **Figures 4.0 – 4.8**. A building materials and sample inventory which includes material definitions, descriptions and locations is also included as **Table 1**.

3.4 Wipe Samples

Wipe sampling was performed on areas suspected to be impacted by PCB-laden dust or oils. Wipe samples were conducted in accordance with the methods outlined in the SAP. Large, nearly flat surfaces were selected for wiping based on accessibility at the time of the sampling, as some areas required use of a lift or access via mezzanine. Priority was given to visually impacted areas and surfaces that could be safely reached.

Each wipe sample was assigned a unique identifier based on the above naming convention, except the material type was "W" for wipe. Wipe sample locations are identified on **Figures 5.0 – 5.7**.

3.5 Fluorescent Light Ballast Inventory

As part of this assessment, an inventory of historical FLBs potentially containing PCBs was developed. Construction specifications indicate FLBs were replaced in the office tower during renovations in approximately 2000-2018. EWI observed fifteen (15) historical ballasts in the former Building 9A area of the low bay and twenty-four (24) historical ballasts in the diesel shop. EWI was unable to dismantle the FLBs for inspection; however, based on age and original construction, these ballasts are assumed to contain PCBs. In the future, these FLBs should be further inspected and or otherwise treated as PCB-containing.

3.6 Sample Containers and Preservatives

Samples of various building materials were collected during this investigation which were placed in laboratory provided 4-ounce clear glass jars. Wipe samples were collected using a laboratory-provided absorbent gauze wetted with hexane and placed in a 2-ounce clear jar after use. Indoor air samples were collected using pre-packaged sampling cartridges. All samples were preserved on ice to maintain a temperature of 4° Celsius (° C) +/- 2 ° C. Building material samples were shipped by overnight courier under chain-of-custody protocol to EMSL Analytical, Inc. (EMSL) in Cinnaminson, NJ. Indoor air samples were collected by courier and delivered to Teklab, Inc. in Collinsville, IL or shipped by overnight courier to

EMSL. The samples collected from IDW were collected by courier and delivered to Teklab, Inc. These laboratories are National Environmental Laboratory Accreditation Program (NELAP)-certified.

3.7 Decontamination Procedures

Re-usable sampling tools were decontaminated between each sample using the following method:

- Washing the tool with Alconox and distilled water wash, using a brush if necessary;
- Distilled water rinse; and
- Hexane rinse.

Decontamination fluids were captured in a designated 5-gallon bucket which was sampled to make a waste determination.

3.8 Investigation-Derived Waste

All supplies and PPE used during sampling were containerized in a 55-gallon drum and decontamination fluids were kept in a designated 5-gallon bucket. The drum and bucket were placed along the east wall of the low bay for temporary storage prior to disposal. A composite sample of the investigation-derived waste (IDW) within the 55-gallon drum was sampled for analysis of PCBs to make a waste determination. The decontamination fluids were sampled for PCBs, Toxic Characteristic Leaching Procedure (TCLP) Volatile Organic Compounds (VOCs), flashpoint and corrosivity/pH. Based on analytical results, the IDW was determined to be non-hazardous and was disposed via Terra Environmental. Waste manifests are attached in Appendix B.

3.9 Quality Assurance / Quality Control

The purpose of Quality Assurance / Quality Control (QA/QC) procedures is to produce data of known and expected quality. A combination of field samples and laboratory quality control methods were used to assess the data quality objectives of precision, accuracy, representativeness, completeness and comparability.

Holding Times

Sample batches #AD21660, #AD21881, and #AD22681 were received by the laboratory above the acceptable temperature criteria. The samples were packed on ice in coolers and shipped overnight to the laboratory. Due to the inherent thermal stability of PCBs and relatively short transit time, the elevated temperature is not expected to have affected the integrity or accuracy of the analytical results.

Laboratory Data Validation

The following samples were diluted and reporting limits were elevated: CK-LB-1-1, CK-LB-1-2, PC-LB-1-1, PC-LB-2-1, PC-LB-2-2, PC-LB-2-3, PC-LB-3-1, PC-LB-1-2, PC-OF-1-3, PC-LB-4-1, PC-LB-4-2, PC-DS-4-3, PC-DS-3-2, PC-DS-3-3, PC-HB-3-4, PC-HB-5-1, PC-HB-5-2, PC-HB-5-3, PC-HB-6-1, PC-HB-6-2, PC-HB-6-3, PC-NT-8-1, PC-NT-8-2, PC-NT-8-3, PC-NT-10-1, PC-NT-10-2, PC-NT-10-3, PC-NT-11-1, PC-NT-11-2, PC-NT-11-3, PC-NT-12-1, PC-NT-12-2, CK-NT-4-1, CK-NT-4-2, CK-J, PC-J, PC-J-2, C-HB-2-2, W-DS-6-2, and CF-OF-1 (0.5-2). Since concentrations of PCBs were detected above the elevated reporting limits, contamination is confirmed and data objectives have been met.

The analytical results from the February 2025 indoor air sampling event were non-detect; however, the laboratory detection limits were above EPA Indoor Worker RSLs for all analytes except Aroclor 1016. EWI was unable to determine if concentrations of PCBs were present at concentrations above the EPA Indoor Worker RSLs in samples collected during February 2025.

The surrogate recovery was outside the control limits due to dilution in the following samples: C-HB-2-2, PC-LB-2-2, PC-LB-4-1, PC-HB-3-4, PC-HB-5-1, PC-HB-6-1, PC-HB-6-2, PC-NT-11-1, PC-NT-11-2, PC-NT-11-3. The associated LCS quality control results passed acceptable criteria; therefore, there is no effect on data usability. The data is considered acceptable.

MS/MSD recovery was outside control limits due to dilution associated with analysis batches BDF0550 and BDF1133 for Aroclor 1016 and Aroclor 1260. The associated LCS/LCSD passed acceptable criteria; therefore there is no effect on data usability. The data is considered acceptable.

Field Quality Control Samples

Field QA/QC sampling included submittal of field blanks, duplicates, matrix spikes, and matrix spike duplicates, as appropriate. Field quality control samples are intended to help evaluate conditions resulting from field activities and are intended to accomplish two primary goals; assessment of field contamination and assessment of sampling variability. One duplicate sample was collected from each building material at a rate of 10% of the number of primary samples, except where limited sample volume was available. The representative percent difference (RPD) between the original and duplicate was calculated using the following equation:

$$RPD (\%) = ((C1-C2)) / ((C1+C2)/2) * 100, \text{ where:}$$

- RPD = Relative percent difference
- C1 = Larger of the two observed values

- C2 = Smaller of the two observed values

The results are summarized in the table below.

Sample ID	Concentration PCB-1254 (ppm)	RPD %	Concentration PCB-1260 (ppm)	RPD %	Media Type
IA-1-LB-M IA-J (DUP)	<0.000056 <0.000056	NA	<0.000056 <0.000056	NA	Indoor Air
CF-ST-4 (8-10) CF-ST-J (DUP)	<0.23 <0.24	NA	<0.23 <0.24	NA	Concrete Floor
CF-LT-4 (8-10) CF-LT-J (DUP)	<0.24 <0.24	NA	<0.24 <0.24	NA	Concrete Floor
CF-SW-1 (8-10) CF-SW-1-J (DUP)	<0.25 <0.24	NA	<0.25 <0.24	NA	Concrete Floor
CK-NT-4-2 CK-J (DUP)	12 11	8.7	3.5 2.9	18.8	Caulk
M-NT-1-2 M-J (DUP)	<0.25 <0.25	NA	<0.25 <0.25	NA	Mortar
C-NT-6-3 C-J (DUP)	<0.25 <0.24	NA	5.1 7.7	40.6	Concrete
C-NT-5-3 C-J-2 (DUP)	0.30 0.39	26.1	0.46 0.57	21.4	Concrete
BR-DS-5-1 BR-J (DUP)	<0.26 <0.25	NA	<0.26 <0.25	NA	Brick
BR-NT-4-1 BR-J-2 (DUP)	<0.24 <0.25	NA	<0.24 <0.25	NA	Brick
PC-NT-12-1 PC-J (DUP)	21 <0.24	NA	35 32	9	Paint Chip
PC-NT-10-1 PC-J-2 (DUP)	15 15	0	35 35	0	Paint Chip
PC-NT-13-4 PC-J-3 (DUP)	2.6 1.4	60	<0.25 3.7	NA	Paint Chip

"<" indicates the analyte was not detected in the sample above the laboratory reporting limit.

NA – Not applicable due to non-detections in the original and / or duplicate samples.

RPDs for PCB-1254 concentrations in the PC-NT-10-1/PC-J-2, C-NT-5-3/C-J-2 and CK-NT-4-2/CK-J duplicate pairs are below 30%, confirming high precision in laboratory methods and consistency in field sampling methods. The RPDs for PCB-1260 concentrations in the PC-NT-10-1/PC-J-2, PC-NT-12-1/PC-J, C-NT-5-3/C-J-2 and CK-NT-4-2/CK-J duplicate pairs are likewise below 30%.

Seven of the duplicate pairs did not contain PCBs above their respective reporting limits; therefore, calculation of an RPD is not applicable.

RPDs for PCB-1254 in duplicate pair PC-NT-13-4/PC-J-3 and PCB-1260 in duplicate pair C-NT-6-3/C-J are high. The samples were either concrete or paint chips. Although the original/duplicate pairs were collected simultaneously, the heterogeneous nature of solid materials can result in elevated RPD values such as those observed which are not necessarily representative of laboratory precision or field collection methods.

Field blanks were collected during air sampling. No PCBs were detected above the reporting limit during either sampling event.

The above QA/QC assessment indicates that the laboratory results are considered usable for the purposes of this investigation.

Copies of all laboratory analytical reports are provided in Appendix C.

4.0 INVESTIGATIVE RESULTS

4.1 Indoor Air

Analytical results compared to EPA Regional Screening Levels (RSLs) for Indoor Worker are summarized on **Table 2**. The RSLs were calculated based on a hazard quotient of 1 and target risk of 10^{-6} . The OSHA Permissible Exposure Limits (PELs), NIOSH Recommended Exposure Limits (RELs) and MoDNR Non-Residential Risk-Based Target Levels (RBTLS) were also used for comparison of the indoor air data. Results are summarized by seasonal event as follows:

February 2025

- Concentrations of PCBs were not detected above laboratory reporting limits.

May 2025

- PCB-1260 was detected in indoor air samples collected from the unoccupied low bay (IA-LB-M and I-LB-S) and unoccupied 1st level of the diesel shop (IA-LB-N). These concentrations range from 0.0000280 to 0.0000744 milligrams per meter cubed (mg/m^3) above the EPA Indoor Worker RSL of 0.0000215 mg/m^3 . The remaining samples were not detected with PCBs above the laboratory reporting limit.

4.2 Concrete Floors

Analytical results compared to the EPA Cleanup and Bulk Remediation Waste levels for high occupancy areas are summarized on **Table 3**. Results are summarized as follows:

- PCB-1254 and PCB-1260 were detected at concentrations of 7.4 and 40 parts ppm respectively, in sample CF-OF-1 (0.5-2) collected from the surface of the concrete floor core in the mechanical closet of the first floor office area. The combined PCB concentrations from CF-OF-1 (0.5-2) are below the Bulk Remediation Waste level of 50 ppm. The remaining concrete floor samples, including the deeper intervals collected from the same location at 4-6 cm and 6-8 cm, were not detected with PCBs above the laboratory reporting limits.

EWI also assessed each core for visual evidence of sealant and concrete thickness. No evidence of sealant(s) were observed in any of the concrete cores. With the exception of the office space core (CF-OF-1), all concrete cores exhibited a matrix with a high volume of coarse aggregate, including large gravel chunks. In contrast, CF-OF-1 is thought to be located outside the concrete cap area and

represents a separate concrete installation. CF-OF-1 was observed with a thinset layer from 0-0.5 cm followed by a distinctly different concrete composition through the remainder of the core depth.

4.3 Building Materials

Analytical results compared to the EPA Cleanup and Bulk Remediation Waste levels for high occupancy areas are summarized on **Table 4**. Results are summarized by building material as follows:

Concrete

- PCB-1254 was detected in concrete samples C-NT-5-1 and C-NT-5-2 at concentrations of 1.1 and 1.3 ppm above the EPA Cleanup Level of 1 pm. These samples were collected from the surfacing surrounding the freight elevator in the north tower which is currently unoccupied.
- PCB-1260 was detected in concrete sample C-HB-2-2 at a concentration of 350 ppm above the EPA Waste Determination Level of 50 ppm. This sample was collected from a concrete column in the high bay which is currently unoccupied.
- PCB-1260 was also detected in concrete samples C-NT-6-1 and C-NT-6-3 at concentrations of 2.6 and 5.1 ppm above the EPA Cleanup Level of 1 pm. These samples were collected from the crumbling ceiling on the 1st floor of the north tower which is currently unoccupied.
- The remaining ten (10) concrete samples were not detected with concentrations of PCBs above laboratory reporting limits and/or the EPA Cleanup Level.

Brick

- Twenty-four (24) brick samples were collected and not detected with concentrations of PCBs above laboratory reporting limits and/or the EPA Cleanup Level.

Cinder Block

- Three (3) cinder block samples were collected and not detected with concentrations of PCBs above laboratory reporting limits and/or the EPA Cleanup Level.

Plaster

- Three (3) plaster samples were collected and not detected with concentrations of PCBs above laboratory reporting limits and/or the EPA Cleanup Level.

Mortar

- Nine (9) mortar samples were collected and not detected with concentrations of PCBs above laboratory reporting limits and/or the EPA Cleanup Level.

Ceiling Materials

- PCB-1260 was detected in drywall ceiling samples DW-LB-1-1, DW-LB-1-2 and DW-LB-1-3 at concentrations ranging from 1.0 to 4.7 ppm above the EPA Cleanup Level of 1 ppm. These samples were collected from the drywall ceilings located throughout the low bay which is currently unoccupied.
- PCB-1260 was detected in concrete ceiling sample C-LB-3-3 at a concentration of 3.7 ppm above the EPA Cleanup Level of 1 ppm. This sample was collected from the concrete material above and adjacent to the drywall ceilings in the low bay which is currently unoccupied.
- The two (2) remaining ceiling samples were not detected with concentrations of PCBs above laboratory reporting limits and/or the EPA Cleanup Level.

Insulation

- PCB-1260 was detected in insulation sample I-DS-1-1 at a concentration of 3.8 ppm above the EPA Cleanup Level of 1 ppm. This sample was collected from spray-on window insulation located in the diesel shop which is currently unoccupied.
- The fourteen (14) remaining insulation samples were not detected with concentration of PCBs above laboratory reporting limits and/or the EPA Cleanup Level.

Caulk

- PCB-1254 was detected in caulk samples CK-NT-4-1 and CK-NT-4-2 at concentrations of 11 and 12 ppm above the EPA Cleanup Level of 1 ppm. PCB-1260 was also detected in these samples at 2.4 and 3.5 ppm, respectively. These samples were collected from the residual window caulk in the north tower stairwell which is currently unoccupied.

- PCB-1260 was detected in expansion joint samples CK-LB-1-1, CK-LB-1-2 and CK-LB-1-3 at concentrations ranging from 1.8 to 83 ppm above the EPA Cleanup Level of 1 ppm. The sample CK-LB-1-1 was also detected above the EPA Waste Determination Level of 50 ppm. These samples were collected from the expansion joint along the exterior walls of the north warehouse. The north warehouse consists of both the high and low bays and is currently unoccupied.
- The three (3) remaining caulk samples were not detected with concentrations of PCBs above laboratory reporting limits and/or the EPA Cleanup Level.

Floor Tile

- PCB-1260 was detected in floor tile sample FT-LB-1-1 at a concentration of 2.6 ppm above the EPA Cleanup Level of 1 ppm. This sample was collected from an office corridor between the low and high bays which is currently unoccupied.
- The two (2) remaining floor tile samples were not detected with concentrations of PCBs above laboratory reporting limits and/or the EPA Cleanup Level.

Paint Chips

- PCB-1254 and/or PCB-1260 were detected in all forty-two (42) paint chip samples at concentrations ranging from 1.4 to 2,300 ppm above the EPA Cleanup Level of 1 ppm. Paint chip samples PC-LB-1-1, PC-LB-2-1, PC-LB-2-2, PC-LB-2-3, PC-LB-3-1, PC-DS-3-2, PC-HB-3-4, PC-LB-4-1, PC-LB-4-2, PC-DS-4-3, PC-HB-6-1, PC-NT-11-1, PC-NT-11-2 and PC-NT-11-3 were also detected above the EPA Waste Determination Level of 50 ppm. These paint samples were collected from concrete pillars, metal cross beams/ceilings, vertical I-beams and brick walls in the low bay, vertical I-beams and brick walls in the diesel shop, vertical I-beams and brick walls in the high bay, and stair rails in the north tower. The high bay, low bay (including the diesel shop), and north tower are currently unoccupied.

4.4 Wipe Samples

Analytical results compared to the EPA Cleanup and Bulk Remediation Waste levels for high occupancy areas are summarized on **Table 5**. Results are summarized as follows:

- PCB-1260 was detected in dust wipe samples W-DS-6-2 and W-DS-6-3 at concentrations of 21.6

and 12.8 micrograms per square centimeter ($\text{ug}/100 \text{ cm}^2$) above the EPA Cleanup Level of $10 \text{ ug}/100 \text{ cm}^2$. These samples were collected from dust on top of ducting in the diesel shop which is currently unoccupied.

- PCB-1254 was detected in the staining wipe W-NT-12-1 at a concentration of $10.2 \text{ ug}/100 \text{ cm}^2$ above the EPA Cleanup Level of $10 \text{ ug}/100 \text{ cm}^2$. This sample was collected from a grease stain surrounding the freight elevator in the north tower which is currently unoccupied. The freight elevator is not in use.

5.0 CONCLUSIONS AND RECOMMENDATIONS

EWI has performed two (2) seasonal rounds of indoor air testing, building materials sampling, concrete floor coring, and a FLB inventory at the MET Center. **Table 1** provides a summary of suspect building materials sampled for PCBs.

Concentrations of PCBs above Indoor Worker RSLs were detected in indoor air samples collected from the low bay, including the diesel shop during the May 2025 event. These areas are currently unoccupied and restricted for access. Indoor air samples collected from remaining areas including the office tower were below laboratory reporting limits. PCBs were not detected above laboratory reporting limits in the February 2025 event. Additional indoor air sampling may be warranted to assess potential seasonal variability.

Concrete floor coring was conducted to evaluate the integrity of the remedial measures implemented in the 1980s (i.e. epoxy sealant and concrete thickness) and assess potential upward migration of PCBs. Nine (9) cores were collected from historically impacted areas within the warehouse where the concrete cap was reportedly installed. One additional core (CF-OF-1) was collected from the first floor office area to assess conditions outside the capped area. PCB contamination was detected only in the surface interval (0.5-2 cm) of CF-OF-1. Based on visual observations and construction history, this location appears to be outside the remedial cap area. The results of remaining samples effectively suggest that the migration of PCBs has not occurred in the concrete cap area. Any additional sampling and characterization of PCBs in this area may be discussed with the EPA Region 7 PCB Coordinator and, if appropriate, addressed under a separate work plan.

Various PCB-contaminated building materials and wiped-areas were identified during this assessment. Historical FLBs in the unoccupied low bay and diesel shop were also determined to be suspect for PCBs. The majority of PCB detections were found in paint and largely located within the unoccupied and restricted north tower, high and low bays, and diesel shop. A summary of PCB detections exceeding EPA Cleanup Levels are as follows:

- Concrete surfacing surrounding the freight elevator in the north tower;
- A concrete column in the high bay;
- The crumbling concrete ceiling on the 1st floor of the north tower;
- Drywall and associated concrete ceilings located throughout the low bay;
- Spray-on window insulation located in the diesel shop;
- Residual window caulk in the north tower stairwell;

- Expansion joint along the exterior walls of the north warehouse;
- Floor tile in the office corridor between the low and high bays;
- Dust collected from on top of ducts in the diesel shop;
- Grease surrounding the freight elevator in the north tower;
- And paint chips on the 2nd and 6th floors of the office, north warehouse and north tower.

Further characterization of the materials identified may be warranted to better evaluate the extent of PCB impacts and to inform potential future actions. If needed, additional sampling would be outlined in a separate work plan currently under consideration by EWI. Any resulting data would help inform decision-making regarding potential remediation approaches, including options such as removal, encapsulation, phased implementation, or institutional controls.

TABLES

TABLE 1
Building Materials and Sample Inventory

BUILDING MATERIALS AND SAMPLE INVENTORY		
Low Bay (LB)		
Homogenous Material	Location(s)	Sample(s)
Brick Wall	East exterior wall of structure	BR-LB-1-1, BR-LB-1-2
Expansion Joint	Along all exterior walls of north warehouse	CK-LB-1-1, CK-LB-1-2
Concrete Pillars	Throughout office area and bordering the south wall of low bay	C-LB-1-1, C-LB-1-2
Floor Tiles	Corridor and offices between low and high bay	FT-LB-1-1 , FT-LB-1-2, FT-LB-1-3
Drywall Ceiling	Throughout low and high bay	DW-LB-1-1, DW-LB-1-2, DW-LB-1-3
Concrete above Drywall Ceiling	Throughout low and high bay	C-LB-3-1, C-LB-3-2, C-LB-3-3
Paint on Concrete Pillars	Throughout office area and bordering the south wall of low bay	PC-LB-1-1, PC-LB-1-2
Paint on Metal Cross Beams and Ceiling	Throughout low bay including ceiling above former Building 9A	PC-LB-2-1, PC-LB-2-2, PC-LB-2-3
Paint on Vertical I-Beams	Throughout low and high bay	PC-LB-3-1
Paint on Brick Wall	East exterior wall of structure	PC-LB-4-1, PC-LB-4-2
Dust on Metal Cross Beams	Throughout low bay	W-LB-1-1, W-LB-1-2, W-LB-1-3
Dust on Window Sills	Along east wall of low bay	W-LB-2-1, W-LB-2-2, W-LB-2-3
Diesel Shop (DS)		
Brick Wall	East exterior wall of structure	BR-LB-1-3
Spray-on Insulation	In former window wells of north and east walls	I-DS-1-1 , I-DS-1-2, I-DS-1-3
Stained spray-on insulation	In former window wells of north and east walls, resulting from water damage	I-DS-2-1, I-DS-2-2, I-DS-2-3
Paint on Vertical I-Beams	Throughout low and high bay	PC-DS-3-2, PC-DS-3-3
Paint on Brick Wall	East exterior wall of structure	PC-DS-4-3
Dust on Air Ducts	Throughout diesel shop area	W-DS-6-1, W-DS-6-2, W-DS-6-3
Dust on Metal Cross Beams	Throughout diesel shop area	W-DS-7-1, W-DS-7-2, W-DS-7-3
Brick Exterior	North and east walls of diesel shop	BR-DS-5-1, BR-DS-5-2, BR-DS-5-3
Brick Mortar	Between exterior bricks	M-DS-3-2
High Bay (HB)		
Brick Wall	South wall above offices and northwest corner of high bay	BR-HB-2-1, BR-HB-2-2, BR-HB-2-3
Concrete Columns	Along west exterior wall	C-HB-2-1, C-HB-2-2 , C-HB-2-3
Fiberglass Insulation	Behind west exterior wall near the overhead door	I-HB-4-1, I-HB-4-2, I-HB-4-3
Spray-on Insulation	Above classroom ceilings	I-HB-6-1, I-HB-6-2, I-HB-6-3
Expansion Joint	Along all exterior walls of north warehouse	CK-HB-1-3

TABLE 1
Building Materials and Sample Inventory

Window Caulking	West windows	CK-HB-2-1, CK-HB-2-2, CK-HB-2-3
Paint on Vertical I-Beams	Throughout low and high bay	PC-HB-3-4
Paint on Concrete Columns	Along west exterior wall	PC-HB-5-1, PC-HB-5-2, PC-HB-5-3
Paint on Brick Wall	South wall above offices and northwest corner of high bay	PC-HB-6-1, PC-HB-6-2, PC-HB-6-3
Dust on Window Sills	Along west wall	W-HB-3-1, W-HB-3-2
Dust on Metal Cross Beams	Throughout high bay	W-HB-4-1, W-HB-4-2, W-HB-4-3
Dust on top of Return Vents	Along east wall of high bay	W-HB-5-1, W-HB-5-2, W-HB-5-3
Office (OF)		
Concrete Pillars	Throughout office area and bordering the south wall of low bay	C-LB-1-3
Brick Wall	Exposed behind walls on 6th floor	BR-OF-8-1, BR-OF-8-2, BR-OF-8-3
Plaster Wall	Located in stairwells	PL-OF-1-1, PL-OF-1-2, PL-OF-1-3
Spray-on Insulation	Sprayed on ceilings and walls of 6th floor office	I-OF-5-1, I-OF-5-2, I-OF-5-3
Paint on Concrete Pillars	Throughout office area and bordering the south wall of low bay	PC-OF-1-3
Paint on Plaster Walls	On plaster walls of 6th floor office	PC-OF-7-1, PC-OF-7-2, PC-OF-7-3
Dust on Concrete Pillars	Observed on 1st, 2nd and 3rd floors of office	W-OF-8-1, W-OF-8-2, W-OF-8-3
Dust in Stairwell	Located on flat surfaces including window sills and ledging	W-OF-9-1, W-OF-9-2, W-OF-9-3
Exterior Brick	Surrounding main building (office and east wall of warehouse)	BR-OF-7-1, BR-OF-7-2, BR-OF-7-3
Brick Mortar	Between exterior bricks	M-OF-3-3
North Tower (NT)		
Concrete Pillars	Throughout north tower	C-NT-4-1, C-NT-4-2, C-NT-4-3
Concrete Surfacing	Surrounding elevator	C-NT-5-1, C-NT-5-2, C-NT-5-3
Crumbling Concrete Ceiling	Southwest corner of 1st floor	C-NT-6-1, C-NT-6-2, C-NT-6-3
Elevator Brick	Surrounding elevator	BR-NT-3-1, BR-NT-3-2, BR-NT-3-3
Brick Wall	North and east walls	BR-NT-4-1, BR-NT-4-2, BR-NT-4-3
Cinder Block	Surrounding dock area	CB-NT-1-1, CB-NT-1-2, CB-NT-1-3
Brick Mortar	Between bricks surrounding elevator	M-NT-1-1, M-NT-1-2, M-NT-1-3
Cinder Block Mortar	Between cinder blocks in dock area	M-NT-2-1, M-NT-2-2, M-NT-2-3
Window Caulking	Former window wells on west wall of stairwell	CK-NT-4-1, CK-NT-4-2
Wall Paint	Green and white paint on concrete stairwell walls	PC-NT-8-1, PC-NT-8-2, PC-NT-8-3, PC-NT-10-1, PC-NT-10-2, PC-NT-10-3

**TABLE 1
Building Materials and Sample Inventory**

Paint on Stair Riser	Black paint on stair riser	PC-NT-9-1
Paint on Stair Rail	Yellow paint on stair rails	PC-NT-11-1, PC-NT-11-2, PC-NT-11-3
Paint on Concrete Pillars	Throughout north tower	PC-NT-12-1, PC-NT-12-2, PC-NT-12-3, PC-NT-13-1, PC-NT-13-2, PC-NT-13-3
Ceiling Paint	Ceilings of the north tower	PC-NT-13-4
Concrete Staining	Observed on ceiling and pillars in 1st floor dock area	W-NT-10-1, W-NT-10-2, W-NT-10-3
Exterior Brick Staining	Observed along northeast exterior	W-NT-11-1
Elevator Oil Staining	Surrounding west and south walls of freight elevator on 2nd floor	W-NT-12-1, W-NT-12-2
Brick Staining	East wall of 2nd floor	W-NT-13-1
Brick Staining	North wall of 2nd floor	W-NT-14-1
Brick Staining	East wall of 3rd floor	W-NT-15-1
Brick Staining	North wall of 3rd floor	W-NT-16-1
Brick Exterior	North and east walls of building	BR-NT-6-1, BR-NT-6-2, BR-NT-6-3
Brick Mortar	Between exterior bricks	M-NT-3-1

Bold = PCBs above Cleanup Level

BR = Brick

C = Concrete

CB = Cinder Block

CK = Caulk

DW = Drywall

FT = Floor Tile

I = Insulation

M = Mortar

PC = Paint Chip

PL = Plaster

W = Wipe

TABLE 2
Summary of Analytical Results
Indoor Air

July 2025

Sample ID	Sample Date	PCBs								
		PCB-1016	PCB-1221	PCB-1232	PCB-1242	PCB-1248	PCB-1254	PCB-1260	PCB-1262	PCB-1268
EPA Method TO-10A										
mg/m ³										
OSHA Permissible Exposure Limit		1	1	1	1	1	0.5	0.5	0.5	0.5
NIOSH Recommended Exposure Limit		0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001
EPA RSL - Indoor Worker		0.000613	0.0000215	0.0000215	0.0000215	0.0000215	0.0000215	0.0000215	0.0000215*	0.0000215*
ModNRR Non-Residential RBTl		0.000477	0.0000954	0.0000954	0.0000954	0.0000954	0.0000954	0.0000954	0.0000954*	0.0000954*
IA-1-HB-S	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020
IA-1-HB-M	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199
IA-1-HB-N	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000316	<0.0000316	<0.0000316	<0.0000316	<0.0000316	<0.0000316	<0.0000316	<0.0000316	<0.0000316
IA-1-HB-CL	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199
IA-1-LB-N	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	0.0000280	<0.0000199	<0.0000199
IA-1-LB-O	2/11/2025	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	NA	<0.000020
	5/19/2025	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020	<0.000020
IA-1-LB-M	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	0.0000744	<0.0000198	<0.0000198
IA-1-LB-S	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	0.0000510	<0.0000199	<0.0000199
IA-1-N	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198
IA-1-S	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199
IA-2-W	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197
IA-2-E	2/11/2025	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	NA	<0.0000198
	5/19/2025	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198	<0.0000198
IA-3-W	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000193	<0.0000193	<0.0000193	<0.0000193	<0.0000193	<0.0000193	<0.0000193	<0.0000193	<0.0000193
IA-3-E	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199	<0.0000199
IA-4-E	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197
IA-4-W	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197
IA-5-N	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000193	<0.0000193	<0.0000193	<0.0000193	<0.0000193	<0.0000193	<0.0000193	<0.0000193	<0.0000193
IA-5-S	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197	<0.0000197
IA-6-E	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000195	<0.0000195	<0.0000195	<0.0000195	<0.0000195	<0.0000195	<0.0000195	<0.0000195	<0.0000195
IA-6-W	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028
	5/19/2025	<0.0000196	<0.0000196	<0.0000196	<0.0000196	<0.0000196	<0.0000196	<0.0000196	<0.0000196	<0.0000196
IA-J (DUP)	2/11/2025	<0.000056	<0.000076	<0.000076	<0.000083	<0.000042	<0.000056	<0.000056	NA	<0.000028

Notes:

< = Analyte not detected above the laboratory reporting limit

mg/m³ = milligrams per cubic meter of air

NIOSH REL = National Institute for Safety and Health Recommended Exposure Limit

OSHA = Occupational Safety and Health Administration

PCB = Polychlorinated biphenyl

REL = Permissible Exposure Limit

RSL = Regional Screening Level - Select Hazard Quotient 1, Target Risk 10-6

MoDNR = Missouri Department of Natural Resources

RBTl = Risk Based Target Level

Missouri Risk-Based Corrective Action (MRBCA) Technical Guidance: Appendix B - Default Target Levels and Tier 1 Risk-Based Target Levels, dated June 1, 2006

*= Aroclor 1254 was used to screen Aroclor 1262/1268 since no values specific to Aroclor 1262/1268 exist.

TABLE 3
Summary of Analytical Results
Concrete Floor Cores

Sample ID	Sample Date	Depth (cm)	PCB-1016	PCB-1221	PCB-1232	PCB-1242	PCB-1248	PCB-1254	PCB-1260	PCB-1262	PCB-1268
			Method 8082								
			ppm (mg/kg)								
Cleanup Level			1	1	1	1	1	1	1	1	1
EPA Waste Determination Level			50	50	50	50	50	50	50	50	50
Small Transformer Assembly											
CF-ST-1	5/22/2025	0.5-2	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
		4-6	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
		8-10	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
CF-ST-2	5/22/2025	0.5-2	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
		4-6	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
		8-10	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
CF-ST-3	5/22/2025	0.5-2	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
		4-6	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
		8-10	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
CF-ST-4	5/22/2025	0.5-2	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
		4-6	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23
		8-10	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23
CF-ST-J (DUP)	5/22/2025	8-10	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
Large Transformer Assembly											
CF-LT-1	5/21/2025	0.5-2	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
		4-6	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
		8-10	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
CF-LT-2	5/21/2025	0.5-2	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
		4-6	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
		8-10	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
CF-LT-3	5/21/2025	0.5-2	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
		4-6	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
		8-10	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
CF-LT-4	5/21/2025	0.5-2	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23
		4-6	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
		8-10	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
CF-LT-J (DUP)	5/21/2025	8-10	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
South Warehouse											
CF-SW-1	5/20/2025	0.5-2	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
		4-6	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
		8-10	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
CF-SW-1-J (DUP)	5/20/2025	8-10	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
Office											
CF-OF-1	5/20/2025	0.5-2	<2.5	<2.5	<2.5	<2.5	<2.5	7.4	40	<2.5	<2.5
		4-6	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
		6-8	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22

CF = concrete floor

LT = large transformer area

OF = office

PCB = polychlorinated biphenyl

ST = small transformer area

SW = south warehouse

Bold = concentration above laboratory reporting limit

< = concentration below indicated laboratory reporting limit

mg/kg = milligrams per kilogram

ppm = parts per million

green highlight = concentration exceeds cleanup level

pink highlight = concentration exceeds EPA definition for remediation waste

TABLE 4
Summary of Analytical Results
Building Materials

Sample ID	Sample Date	Location	PCB-1016	PCB-1221	PCB-1232	PCB-1242	PCB-1248	PCB-1254	PCB-1260	PCB-1262	PCB-1268
			Method 8082								
			ppm (mg/kg)								
Cleanup Level			1	1	1	1	1	1	1	1	
EPA Waste Determination Level			50	50	50	50	50	50	50	50	
Concrete											
C-LB-1-1	5/21/2025	Low Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	0.43	<0.25	<0.25
C-LB-1-2	5/21/2025	Low Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
C-OF-1-3	5/21/2025	Office	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	0.46	<0.25	<0.25
C-HB-2-1	5/22/2025	High Bay	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	0.74	<0.24	<0.24
C-HB-2-2	5/22/2025	High Bay	<100	<100	<100	<100	<100	<100	350	<100	<100
C-HB-2-3	5/22/2025	High Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	0.86	<0.25	<0.25
C-NT-4-1	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
C-NT-4-2	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	0.96	<0.24	<0.24
C-NT-4-3	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	0.33	<0.25	<0.25
C-NT-5-1	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	1.1	<0.25	0.49	<0.25
C-NT-5-2	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	1.3	<0.24	<0.24	<0.24
C-NT-5-3	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	0.30	0.46	<0.25	<0.25
C-J-2 (DUP)	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	0.39	0.57	<0.25	<0.25
C-NT-6-1	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	2.6	<0.24	<0.24
C-NT-6-2	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	0.54	<0.24	<0.24
C-NT-6-3	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	5.1	<0.25	<0.25
C-J (DUP)	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	7.7	<0.24	<0.24
Brick											
BR-LB-1-1	5/21/2025	Low Bay	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	0.69	<0.24	<0.24
BR-LB-1-2	5/21/2025	Low Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
BR-DS-1-3	5/21/2025	Diesel Shop	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
BR-HB-2-1	5/22/2025	High Bay	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
BR-HB-2-2	5/22/2025	High Bay	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
BR-HB-2-3	5/22/2025	High Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
BR-NT-3-1	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
BR-NT-3-2	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
BR-NT-3-3	5/23/2025	North Tower	<0.26	<0.26	<0.26	<0.26	<0.26	0.76	<0.26	0.45	<0.26
BR-NT-4-1	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
BR-J-2 (DUP)	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
BR-NT-4-2	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
BR-NT-4-3	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
BR-DS-5-1	5/23/2025	Diesel Shop	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
BR-J (DUP)	5/23/2025	Diesel Shop	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
BR-DS-5-2	5/23/2025	Diesel Shop	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
BR-DS-5-3	5/23/2025	Diesel Shop	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
BR-NT-6-1	5/23/2025	North Tower	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
BR-NT-6-2	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
BR-NT-6-3	5/23/2025	North Tower	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
BR-OF-7-1	5/23/2025	Office	<0.26	<0.26	<0.26	<0.26	<0.26	0.38	<0.26	<0.26	<0.26
BR-OF-7-2	5/23/2025	Office	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
BR-OF-7-3	5/23/2025	Office	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
BR-OF-8-1	5/23/2025	Office	<0.25	<0.25	<0.25	<0.25	<0.25	0.57	0.32	<0.25	<0.25
BR-OF-8-2	5/23/2025	Office	<0.25	<0.25	<0.25	<0.25	<0.25	0.27	<0.25	<0.25	<0.25
BR-OF-8-3	5/23/2025	Office	<0.24	<0.24	<0.24	<0.24	<0.24	0.28	<0.24	<0.24	<0.24
Cinder Block											
CB-NT-1-1	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
CB-NT-1-2	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
CB-NT-1-3	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
Plaster											
PL-OF-1-1	5/22/2025	Office	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
PL-OF-1-2	5/22/2025	Office	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
PL-OF-1-3	5/22/2025	Office	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24

TABLE 4
Summary of Analytical Results
Building Materials

Sample ID	Sample Date	Location	PCB-1016	PCB-1221	PCB-1232	PCB-1242	PCB-1248	PCB-1254	PCB-1260	PCB-1262	PCB-1268
			Method 8082								
			ppm (mg/kg)								
Cleanup Level			1	1	1	1	1	1	1	1	1
EPA Waste Determination Level			50	50	50	50	50	50	50	50	50
Mortar											
M-NT-1-1	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
M-NT-1-2	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
M-J (DUP)	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
M-NT-1-3	5/23/2025	North Tower	<0.26	<0.26	<0.26	<0.26	<0.26	0.74	<0.26	0.37	<0.26
M-NT-2-1	5/23/2025	North Tower	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
M-NT-2-2	5/23/2025	North Tower	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	0.43	<0.24	<0.24
M-NT-2-3	5/23/2025	North Tower	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	0.41	<0.23	<0.23
M-NT-3-1	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
M-DS-3-2	5/23/2025	Diesel Shop	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
M-OF-3-3	5/23/2025	Office	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24
Ceiling Materials											
DW-LB-1-1	5/22/2025	Low Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	4.7	<0.25	<0.25
DW-LB-1-2	5/22/2025	Low Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	1.0	<0.25	<0.25
DW-LB-1-3	5/22/2025	Low Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	1.4	<0.25	<0.25
C-LB-3-1	5/22/2025	Low Bay	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	0.88	<0.24	<0.24
C-LB-3-2	5/22/2025	Low Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	0.67	<0.25	<0.25
C-LB-3-3	5/22/2025	Low Bay	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	3.7	<0.26	<0.26
Insulation											
I-DS-1-1	5/21/2025	Diesel Shop	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	3.8	<0.49	<0.49
I-DS-1-2	5/21/2025	Diesel Shop	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	0.92	<0.47	<0.47
I-DS-1-3	5/21/2025	Diesel Shop	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47
I-DS-2-1	5/21/2025	Diesel Shop	<0.43	<0.43	<0.43	<0.43	<0.43	<0.43	0.50	<0.43	<0.43
I-DS-2-2	5/21/2025	Diesel Shop	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49	<0.49
I-DS-2-3	5/21/2025	Diesel Shop	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	0.92	<0.50	<0.50
I-HB-4-1	5/21/2025	High Bay	<0.51	<0.51	<0.51	<0.51	<0.51	<0.51	<0.51	<0.51	<0.51
I-HB-4-2	5/22/2025	High Bay	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
I-HB-4-3	5/22/2025	High Bay	<0.96	<0.96	<0.96	<0.96	<0.96	<0.96	<0.96	<0.96	<0.96
I-OF-5-1	5/21/2025	Office	<0.86	<0.86	<0.86	<0.86	<0.86	<0.86	<0.86	<0.86	<0.86
I-OF-5-2	5/21/2025	Office	<0.89	<0.89	<0.89	<0.89	<0.89	<0.89	<0.89	<0.89	<0.89
I-OF-5-3	5/21/2025	Office	<0.96	<0.96	<0.96	<0.96	<0.96	<0.96	<0.96	<0.96	<0.96
I-HB-6-1	5/22/2025	High Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
I-HB-6-2	5/22/2025	High Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
I-HB-6-3	5/22/2025	High Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
Caulk											
CK-LB-1-1	5/20/2025	Low Bay	<7.5	<7.5	<7.5	<7.5	<7.5	<7.5	83	<7.5	<7.5
CK-LB-1-2	5/20/2025	Low Bay	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	48	<5.1	<5.1
CK-HB-1-3	5/20/2025	High Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	1.8	<0.25	<0.25
CK-HB-2-1	5/21/2025	High Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	0.42	<0.25	<0.25
CK-HB-2-2	5/21/2025	High Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
CK-HB-2-3	5/21/2025	High Bay	<0.82	<0.82	<0.82	<0.82	<0.82	<0.82	<0.82	<0.82	<0.82
CK-NT-4-1	5/23/2025	North Tower	<0.79	<0.79	<0.79	<0.79	<0.79	11	2.4	<0.79	<0.79
CK-NT-4-2	5/23/2025	North Tower	<0.98	<0.98	<0.98	<0.98	<0.98	12	3.5	<0.98	<0.98
CK-J (DUP)	5/23/2025	North Tower	<0.98	<0.98	<0.98	<0.98	<0.98	11	2.9	<0.98	<0.98
Floor Tile											
FT-LB-1-1	5/23/2025	Low Bay	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	2.6	<0.24	<0.24
FT-LB-1-2	5/23/2025	Low Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
FT-LB-1-3	5/23/2025	Low Bay	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	0.31	<0.25	<0.25

TABLE 4
Summary of Analytical Results
Building Materials

Sample ID	Sample Date	Location	PCB-1016	PCB-1221	PCB-1232	PCB-1242	PCB-1248	PCB-1254	PCB-1260	PCB-1262	PCB-1268
			Method 8082								
			ppm (mg/kg)								
Cleanup Level			1	1	1	1	1	1	1	1	1
EPA Waste Determination Level			50	50	50	50	50	50	50	50	50
Paint Chips											
PC-LB-1-1	5/20/2025	Low Bay	<9.8	<9.8	<9.8	<9.8	<9.8	<9.8	93	<9.8	<9.8
PC-LB-1-2	5/21/2025	Low Bay	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	45	<5.0	<5.0
PC-OF-1-3	5/21/2025	Office	<1.0	<1.0	<1.0	<1.0	<1.0	5.9	7.7	<1.0	<1.0
PC-LB-2-1	5/20/2025	Low Bay	<7.7	<7.7	<7.7	<7.7	<7.7	<7.7	80	<7.7	<7.7
PC-LB-2-2	5/20/2025	Low Bay	<26	<26	<26	<26	<26	<26	180	<26	<26
PC-LB-2-3	5/20/2025	Low Bay	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3	86	<7.3	<7.3
PC-LB-3-1	5/20/2025	Low Bay	<12	<12	<12	<12	<12	<12	170	<12	<12
PC-DS-3-2	5/21/2025	Diesel Shop	<13	<13	<13	<13	<13	<13	140	<13	<13
PC-DS-3-3	5/21/2025	Diesel Shop	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	36	<4.9	<4.9
PC-HB-3-4	5/21/2025	High Bay	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	59	<5.0	<5.0
PC-LB-4-1	5/21/2025	Low Bay	<50	<50	<50	<50	<50	<50	860	<50	<50
PC-LB-4-2	5/21/2025	Low Bay	<7.6	<7.6	<7.6	<7.6	<7.6	<7.6	73	<7.6	<7.6
PC-DS-4-3	5/21/2025	Diesel Shop	<7.6	<7.6	<7.6	<7.6	<7.6	<7.6	78	<7.6	<7.6
PC-HB-5-1	5/21/2025	High Bay	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	44	<5.1	<5.1
PC-HB-5-2	5/21/2025	High Bay	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	26	<2.5	<2.5
PC-HB-5-3	5/21/2025	High Bay	<1.3	<1.3	<1.3	<1.3	<1.3	<1.3	11	<1.3	<1.3
PC-HB-6-1	5/21/2025	High Bay	<12	<12	<12	<12	<12	<12	99	<12	<12
PC-HB-6-2	5/21/2025	High Bay	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	40	<5.0	<5.0
PC-HB-6-3	5/21/2025	High Bay	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	19	<2.5	<2.5
PC-OF-7-1	5/21/2025	Office	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	11	<2.5	<2.5
PC-OF-7-2	5/21/2025	Office	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	5.7	<0.25	<0.25
PC-OF-7-3	5/21/2025	Office	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	6.6	<0.25	<0.25
PC-NT-8-1	5/23/2025	North Tower	<1.3	<1.3	<1.3	<1.3	<1.3	12	14	<1.3	<1.3
PC-NT-8-2	5/23/2025	North Tower	<1.2	<1.2	<1.2	<1.2	<1.2	9.4	11	<1.2	<1.2
PC-NT-8-3	5/23/2025	North Tower	<0.75	<0.75	<0.75	<0.75	<0.75	<0.75	11	<0.75	<0.75
PC-NT-9-1	5/23/2025	North Tower	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	22	<1.0	<1.0
PC-NT-10-1	5/23/2025	North Tower	<2.4	<2.4	<2.4	<2.4	<2.4	15	35	<2.4	<2.4
PC-J-2 (DUP)	5/23/2025	North Tower	<2.4	<2.4	<2.4	<2.4	<2.4	15	35	<2.4	<2.4
PC-NT-10-2	5/23/2025	North Tower	<0.48	<0.48	<0.48	<0.48	<0.48	4.8	8.5	<0.48	<0.48
PC-NT-10-3	5/23/2025	North Tower	<1.2	<1.2	<1.2	<1.2	<1.2	7.9	12	<1.2	<1.2
PC-NT-11-1	5/23/2025	North Tower	<51	<51	<51	<51	<51	<51	1200	<51	<51
PC-NT-11-2	5/23/2025	North Tower	<99	<99	<99	<99	<99	<99	2200	<99	<99
PC-NT-11-3	5/23/2025	North Tower	<120	<120	<120	<120	<120	<120	2300	<120	<120
PC-NT-12-1	5/23/2025	North Tower	<2.5	<2.5	<2.5	<2.5	<2.5	21	35	<2.5	<2.5
PC-J (DUP)	5/23/2025	North Tower	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	32	<2.4	<2.4
PC-NT-12-2	5/23/2025	North Tower	<1.2	<1.2	<1.2	<1.2	<1.2	7.3	15	<1.2	<1.2
PC-NT-12-3	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	3.7	<0.25	<0.25
PC-NT-13-1	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	4.2	4.8	<0.25	<0.25
PC-NT-13-2	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	2.4	5.1	<0.25	<0.25
PC-NT-13-3	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	5.0	<0.25	<0.25
PC-NT-13-4	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	2.6	<0.25	0.32	<0.25
PC-J-3 (DUP)	5/23/2025	North Tower	<0.25	<0.25	<0.25	<0.25	<0.25	1.4	3.7	<0.25	<0.25

PCB = polychlorinated biphenyl

< = concentration below indicated laboratory reporting limit

Bold = concentration above laboratory reporting limit

mg/kg = milligrams per kilogram

ppm = parts per million

green highlight = concentration exceeds cleanup level

pink highlight = concentration exceeds EPA definition for remediation waste

TABLE 5
Summary of Analytical Results
Wipe Samples

Sample ID	Sample Date	PCB-1016	PCB-1221	PCB-1232	PCB-1242	PCB-1248	PCB-1254	PCB-1260	PCB-1262	PCB-1268
		Method 8082								
		ppm (µg/100cm ²)								
EPA High Occupancy Cleanup Level		10	10	10	10	10	10	10	10	10
EPA Waste Determination Level		100	100	100	100	100	100	100	100	100
Low Bay										
W-LB-1-1	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	3.04	<0.50	<0.50
W-LB-1-2	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	2.42	<0.50	<0.50
W-LB-1-3	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	7.04	<0.50	<0.50
W-LB-2-1	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	5.40	<0.50	<0.50
W-LB-2-2	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	0.62	<0.50	<0.50
W-LB-2-3	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
High Bay										
W-HB-3-1	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-HB-3-2	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-HB-4-1	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	6.61	<0.50	<0.50
W-HB-4-2	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	1.96	<0.50	<0.50
W-HB-4-3	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-HB-5-1	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-HB-5-2	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-HB-5-3	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	1.32	<0.50	<0.50
Diesel Shop										
W-DS-6-1	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	4.35	<0.50	<0.50
W-DS-6-2	5/22/2025	<5	<5	<5	<5	<5	<5	21.6	<5	<5
W-DS-6-3	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	12.8	<0.50	<0.50
W-DS-7-1	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-DS-7-2	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-DS-7-3	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	0.884	<0.50	<0.50
Office										
W-OF-8-1	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-OF-8-2	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-OF-8-3	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	0.511	<0.50	<0.50
W-OF-9-1	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-OF-9-2	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-OF-9-3	5/22/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	1.30	<0.50	<0.50
North Tower										
W-NT-10-1	5/23/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-NT-10-2	5/23/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-NT-10-3	5/23/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-NT-11-1	5/23/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	3.70	<0.50	<0.50
W-NT-12-1	5/23/2025	<0.50	<0.50	<0.50	<0.50	<0.50	10.2	<0.50	<0.50	<0.50
W-NT-12-2	5/23/2025	<0.50	<0.50	<0.50	<0.50	<0.50	1.01	<0.50	<0.50	<0.50
W-NT-13-1	5/23/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	0.627	<0.50	<0.50
W-NT-14-1	5/23/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	2.56	<0.50	<0.50
W-NT-15-1	5/23/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
W-NT-16-1	5/23/2025	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50

PCB = polychlorinated biphenyl

< = concentration below indicated laboratory reporting limit

Bold = concentration above laboratory reporting limit

J = estimated at a concentration below laboratory reporting limit

mg/kg = milligrams per kilogram

ppm = parts per million

green highlight = concentration exceeds cleanup level

pink highlight = concentration exceeds EPA definition for remediation waste

FIGURES



NORTH



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SCALE IN FEET

0 100 200



APPROXIMATE



ENVIRONMENTAL WORKS

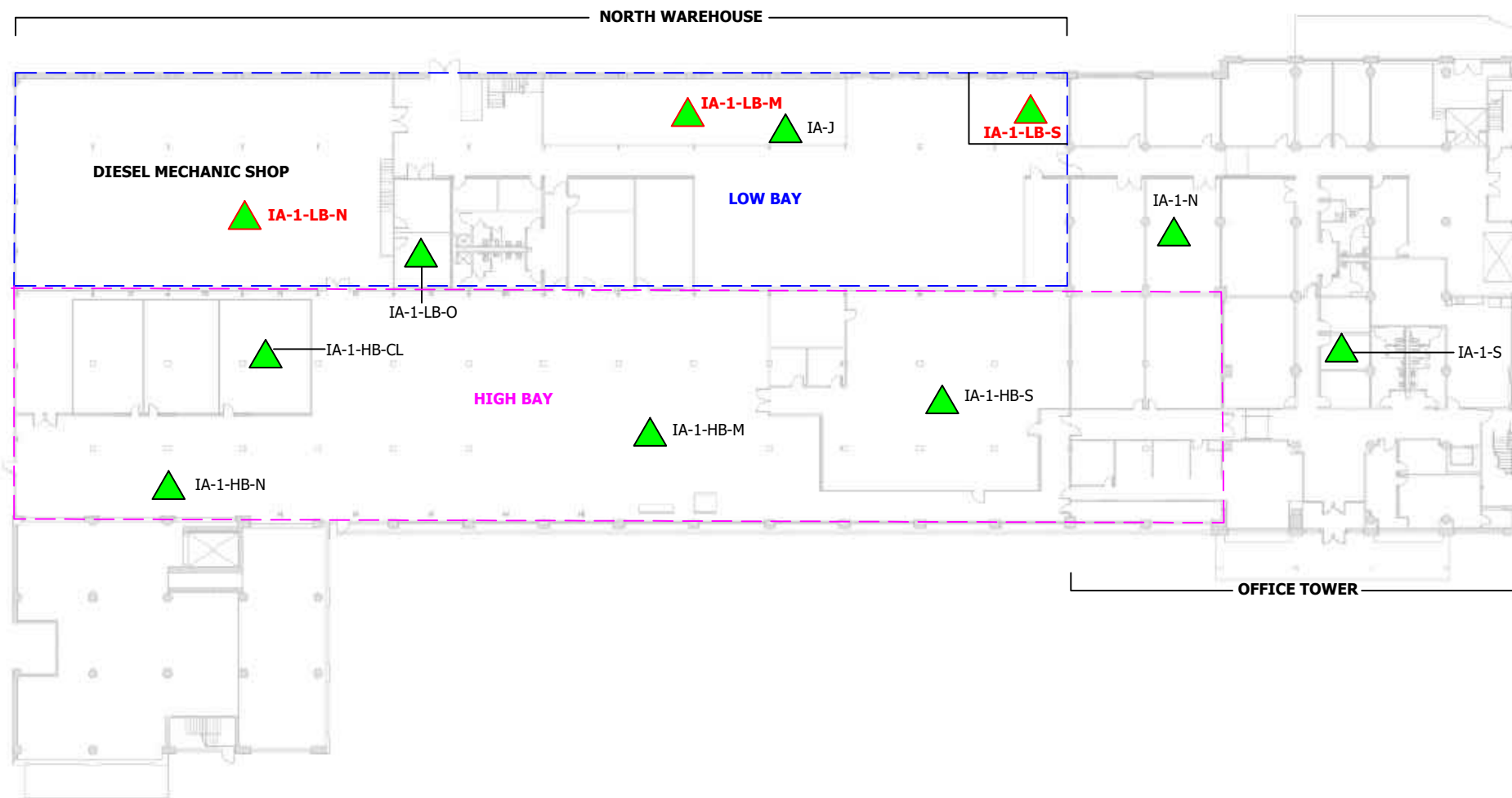
1455 E. Chestnut Expressway, Springfield, MO 65802

SITE LOCATION MAP

MET CENTER
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

1.0



LEGEND	
	= INDOOR AIR SAMPLE
	= INDOOR AIR SAMPLE ABOVE INDOOR WORKER RSL

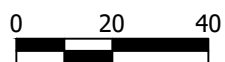
NORTH



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July 22, 2025

SCALE IN FEET



APPROXIMATE



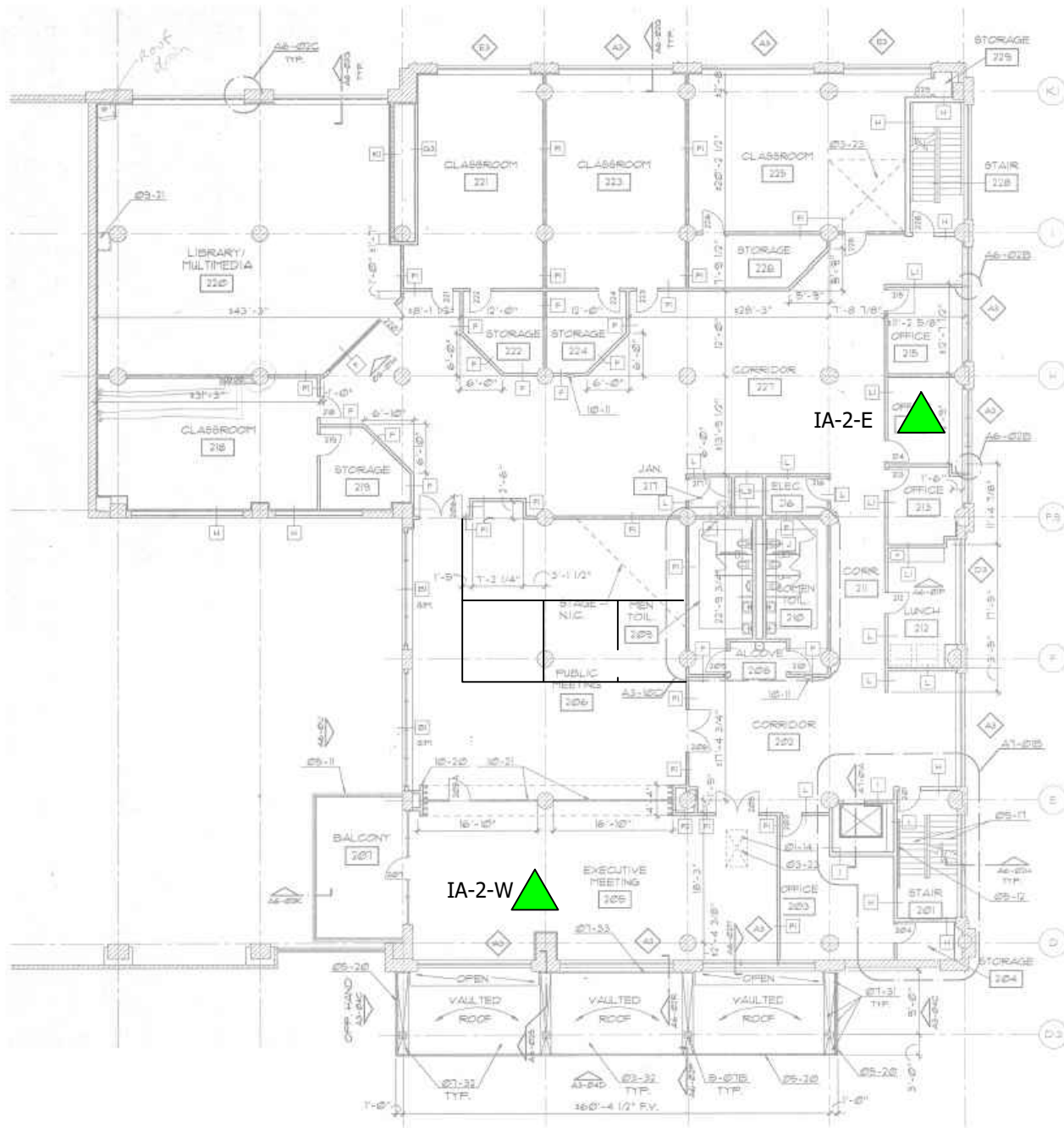
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Kansas City, MO 64108
Phone: (816) 285-8410

INDOOR AIR SAMPLE LOCATIONS

MET CENTER - 1ST FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

2.0



NORTH



LEGEND

▲ = INDOOR AIR SAMPLE

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SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

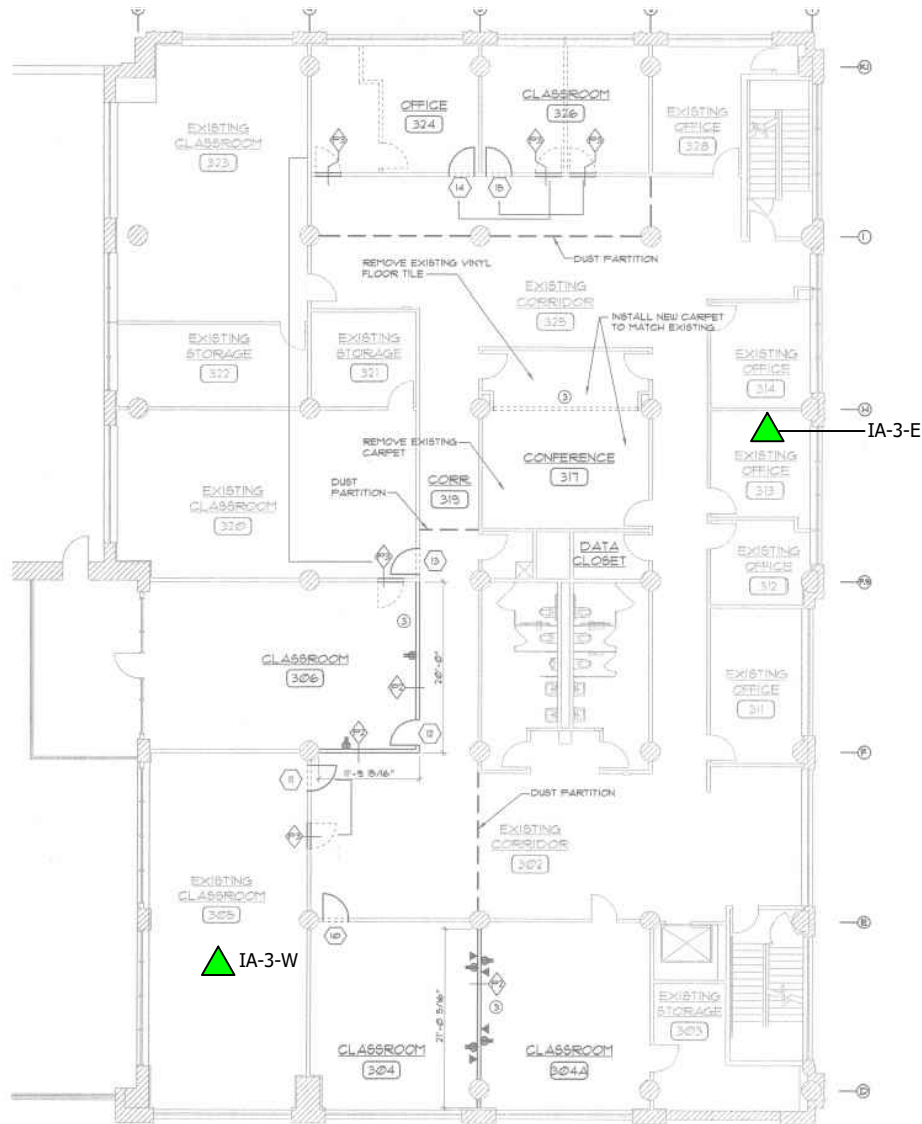
1455 E. Chestnut Expressway, Springfield, MO 65802

INDOOR AIR SAMPLE LOCATIONS

MET CENTER - 2ND FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

2.1



NORTH



LEGEND

▲ = INDOOR AIR SAMPLE

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SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

1455 E. Chestnut Expressway, Springfield, MO 65802

INDOOR AIR SAMPLE LOCATIONS

MET CENTER - 3RD FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

2.2



NORTH



LEGEND

▲ = INDOOR AIR SAMPLE

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SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

1455 E. Chestnut Expressway, Springfield, MO 65802

INDOOR AIR SAMPLE LOCATIONS

MET CENTER - 4TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

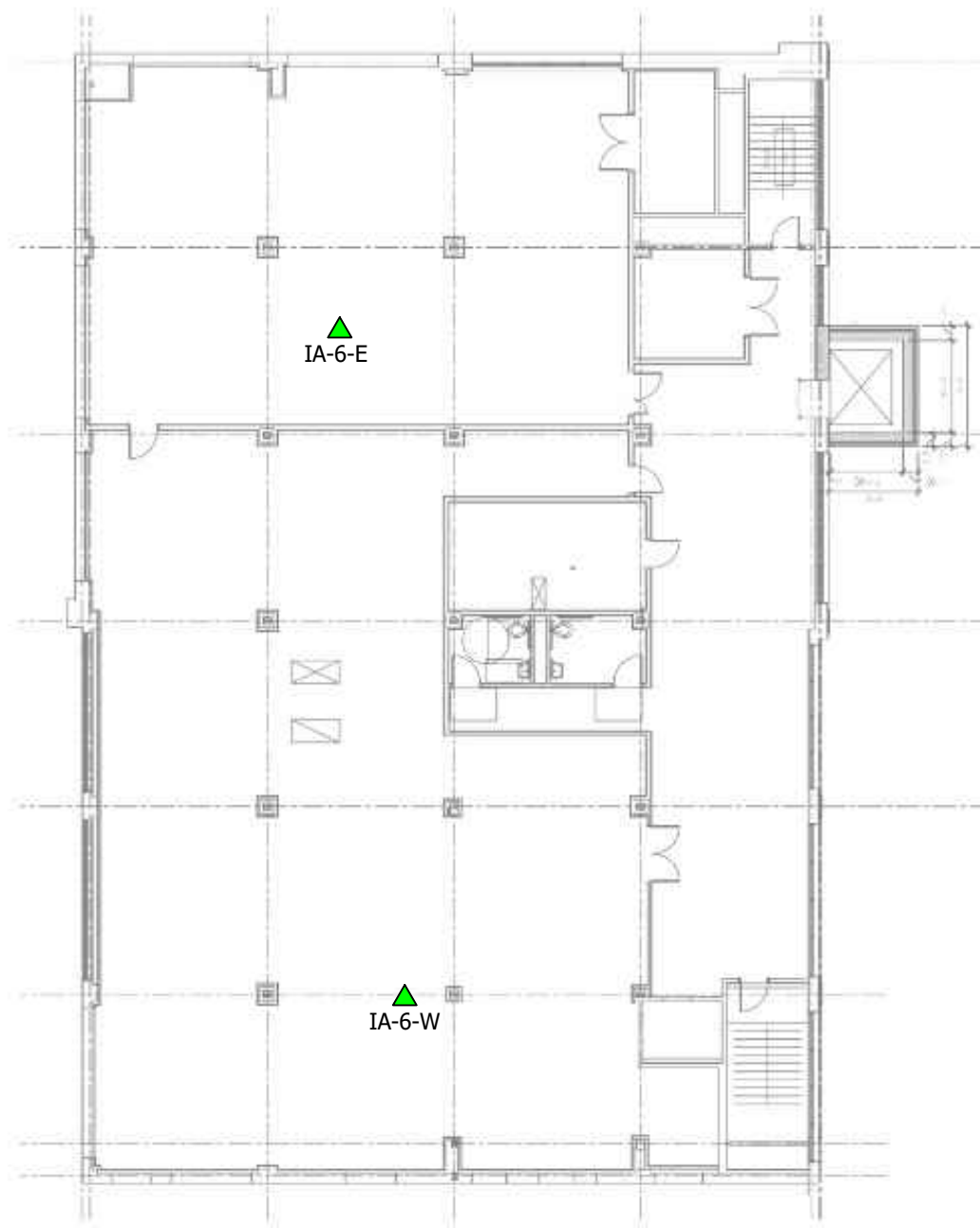
FIGURE

2.3



LEGEND
▲ = INDOOR AIR SAMPLE

CHECKED BY: N. WISE E.W.I. # 252049 DRAWN BY: HMC July 22, 2025	SCALE IN FEET 0 10 20 APPROXIMATE	 ENVIRONMENTAL WORKS 1455 E. Chestnut Expressway, Springfield, MO 65802	INDOOR AIR SAMPLE LOCATIONS	FIGURE 2.4
			MET CENTER - 5TH FLOOR 6347 PLYMOUTH AVENUE WELLSTON, ST. LOUIS COUNTY, MO	



NORTH



LEGEND

▲ = INDOOR AIR SAMPLE

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SCALE IN FEET

0 10 20



APPROXIMATE



ENVIRONMENTAL WORKS

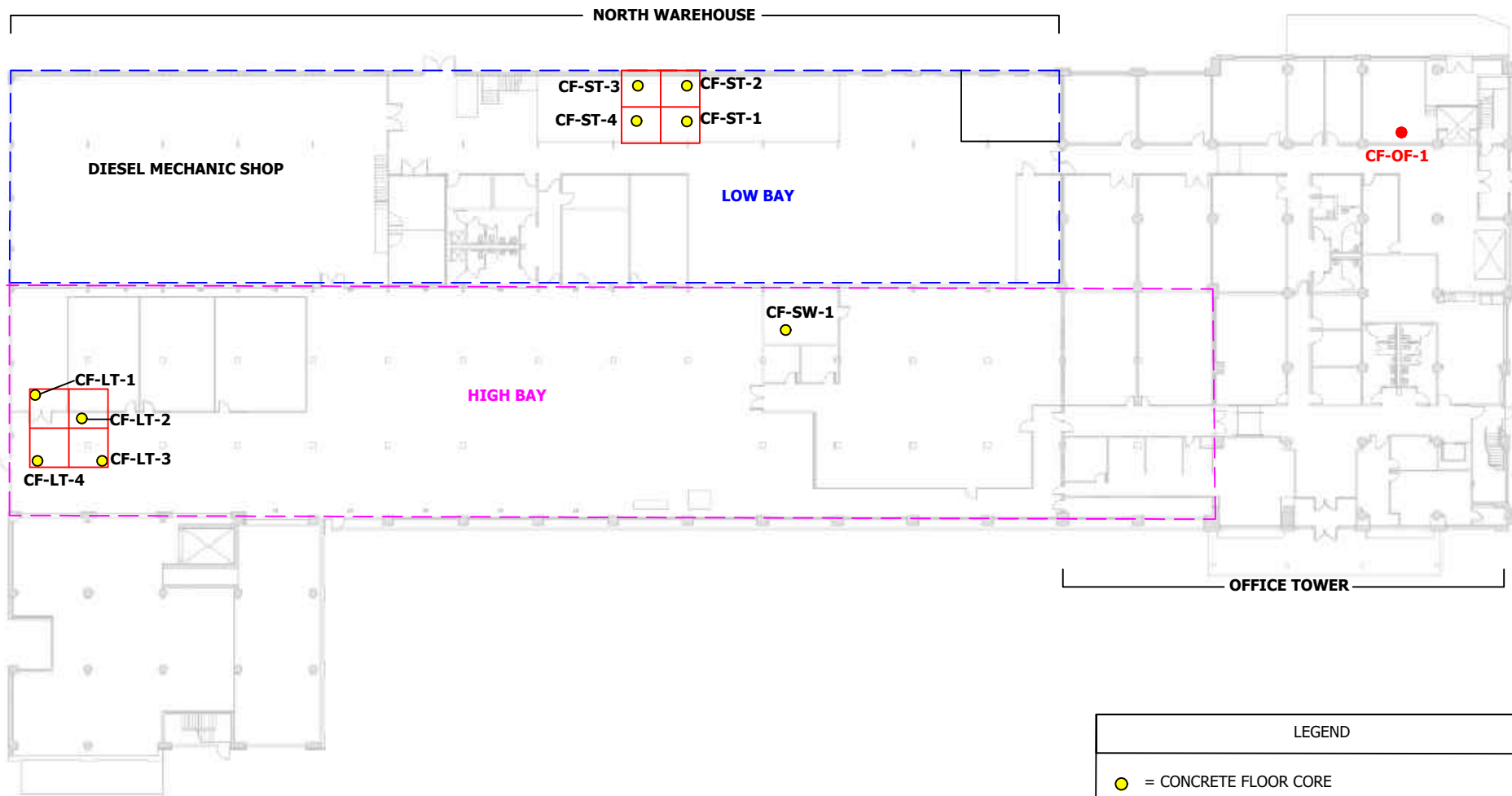
1455 E. Chestnut Expressway, Springfield, MO 65802

INDOOR AIR SAMPLE LOCATIONS

MET CENTER - 6TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

2.5



LEGEND	
●	= CONCRETE FLOOR CORE
●	= CONCRETE FLOOR CORE WITH SAMPLE >1 PPM PCBs
	= 20'x20' RECTANGULAR FLOOR GRID

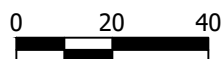
NORTH



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SCALE IN FEET



APPROXIMATE



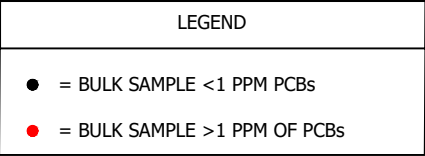
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CONCRETE FLOOR CORES

MET CENTER - 1ST FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

3.0



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SCALE IN FEET

0 20 40



APPROXIMATE

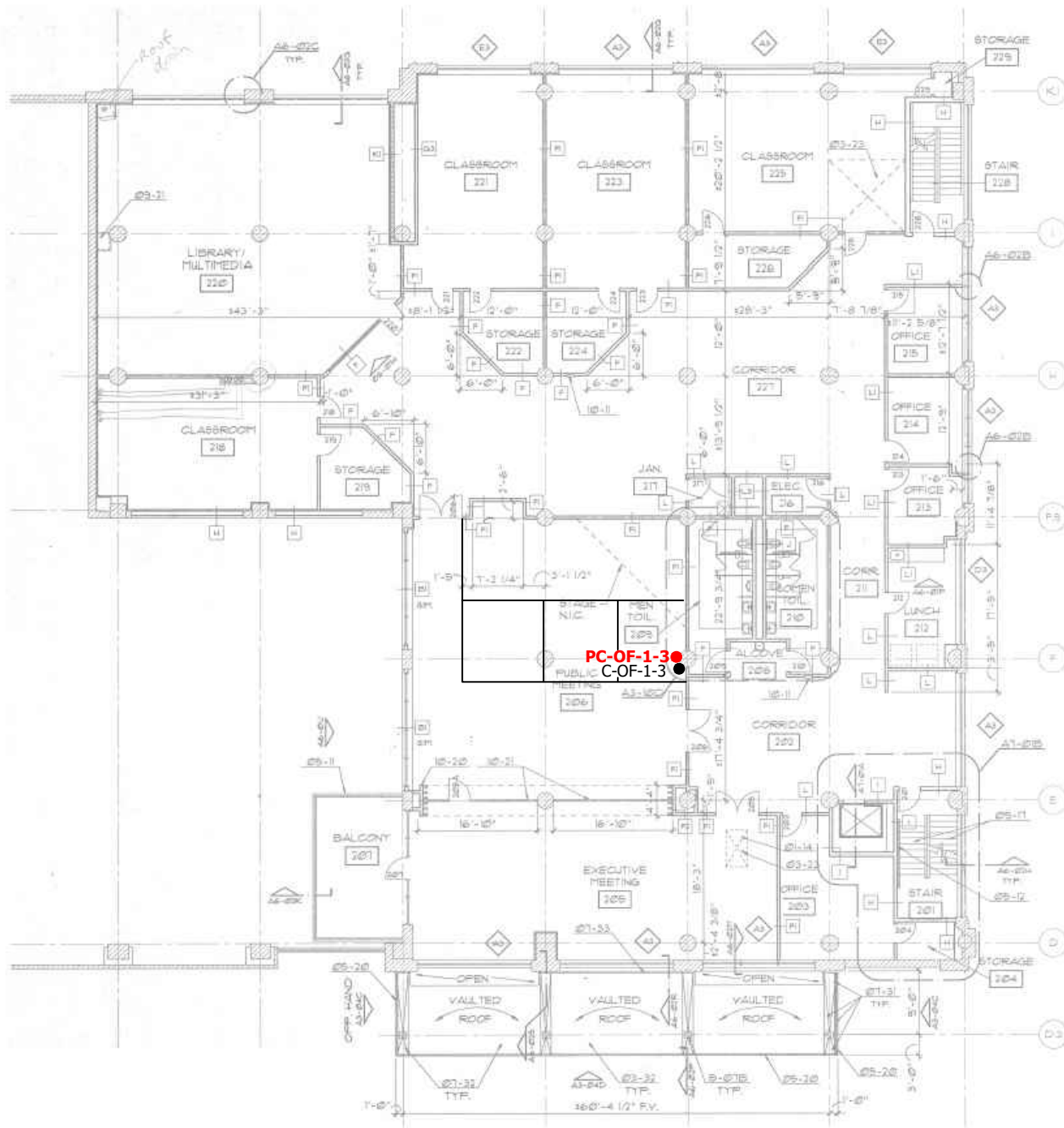


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BULK SAMPLE LOCATIONS

MET CENTER - 1ST FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE
4.0



NORTH



LEGEND

- = BULK SAMPLE <1 PPM PCBs
- = BULK SAMPLE >1 PPM OF PCBs

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July 22, 2025

SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

1455 E. Chestnut Expressway, Springfield, MO 65802

BULK SAMPLE LOCATIONS

MET CENTER - 2ND FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

4.1



NORTH



LEGEND

- = BULK SAMPLE <1 PPM PCBs
- = BULK SAMPLE >1 PPM OF PCBs

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SCALE IN FEET

0 10 20



APPROXIMATE



ENVIRONMENTAL WORKS

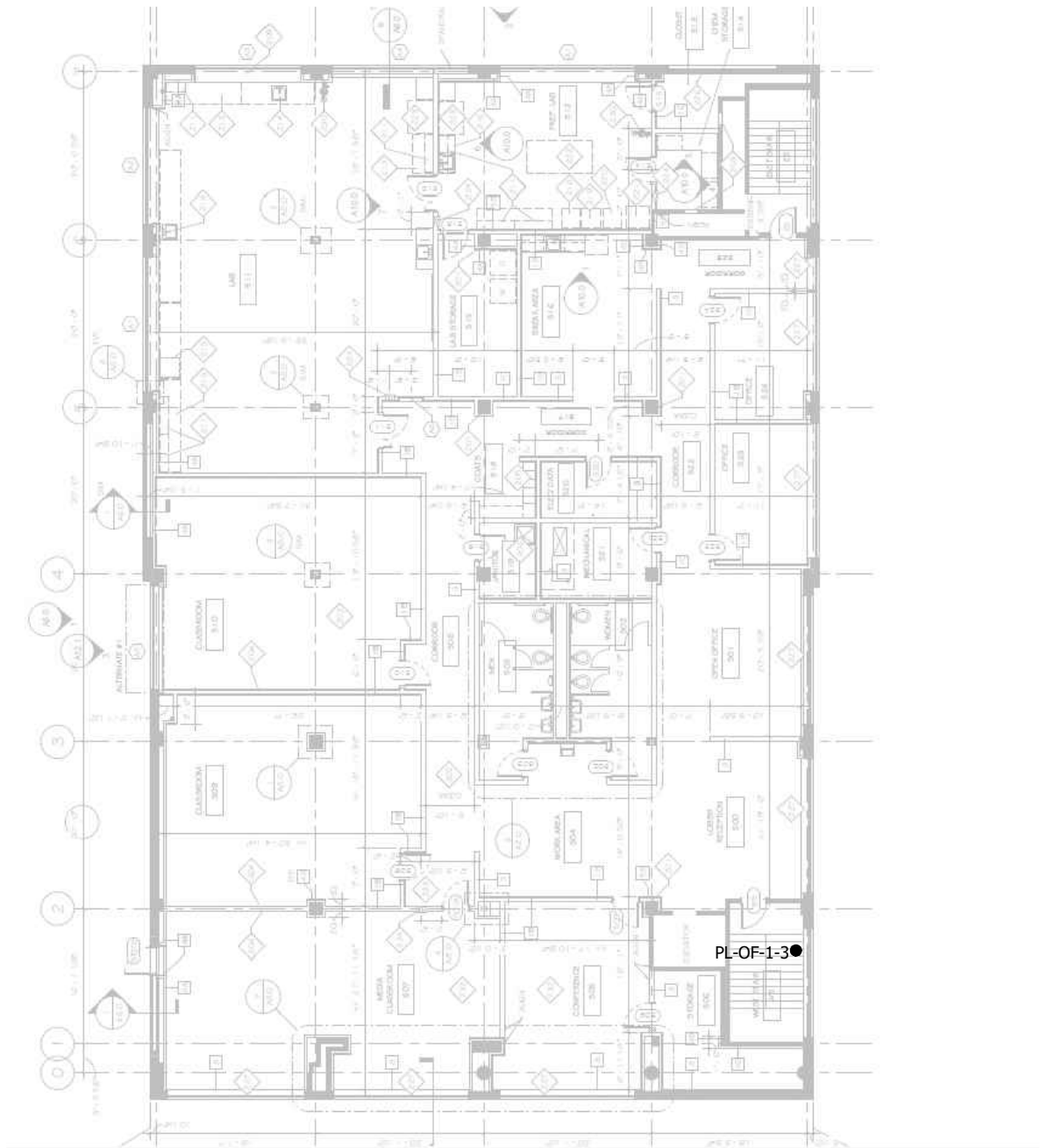
1455 E. Chestnut Expressway, Springfield, MO 65802

BULK SAMPLE LOCATIONS

MET CENTER - 4TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

4.2



NORTH



LEGEND

- = BULK SAMPLE <1 PPM PCBs
- = BULK SAMPLE >1 PPM OF PCBs

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E.W.I. # 252049
DRAWN BY: HMC
July 22, 2025

SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

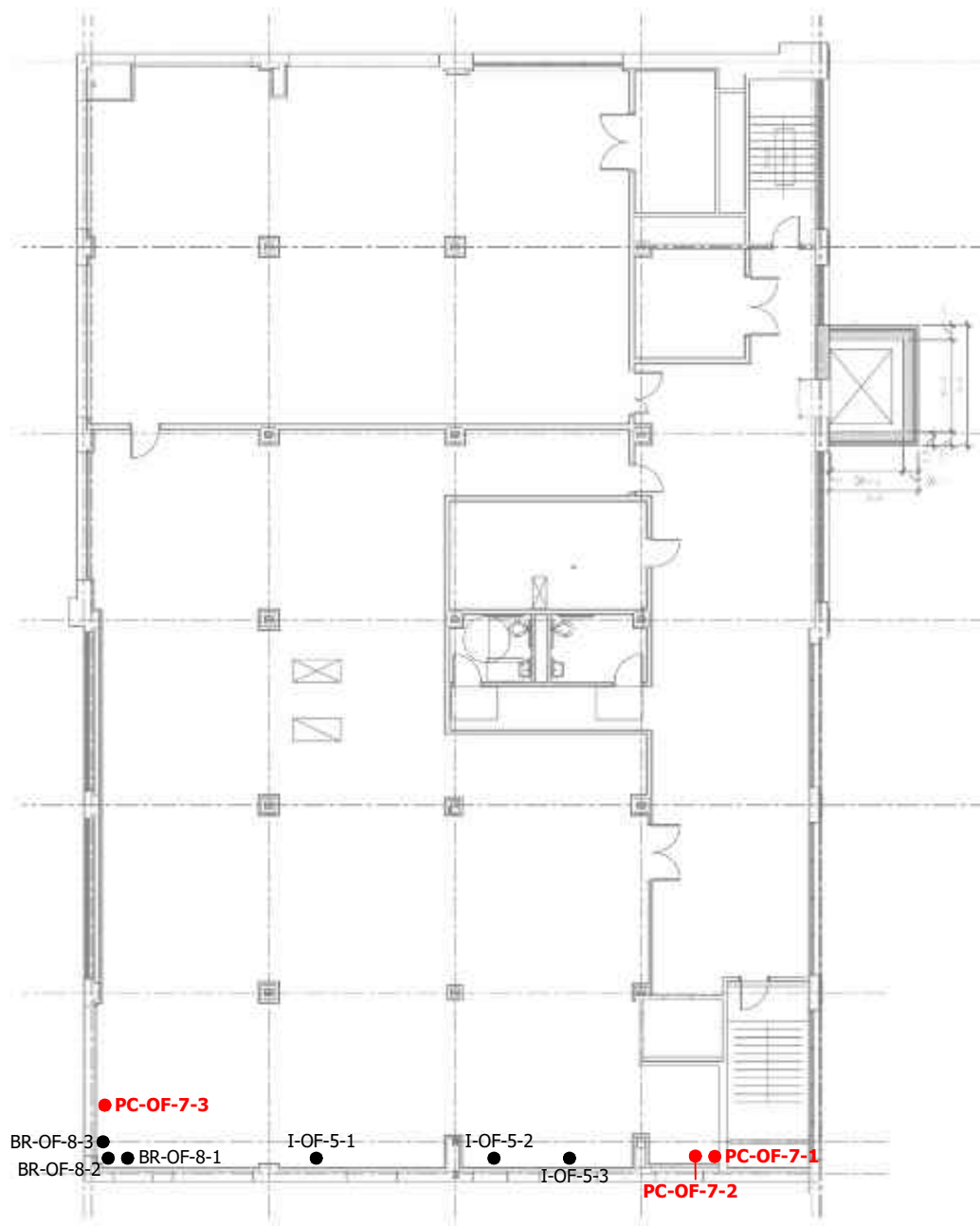
1455 E. Chestnut Expressway, Springfield, MO 65802

BULK SAMPLE LOCATIONS

MET CENTER - 5TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

4.3



NORTH



LEGEND

- = BULK SAMPLE <1 PPM PCBs
- = BULK SAMPLE >1 PPM OF PCBs

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E.W.I. # 252049
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July 22, 2025

SCALE IN FEET

0 10 20



APPROXIMATE



ENVIRONMENTAL WORKS

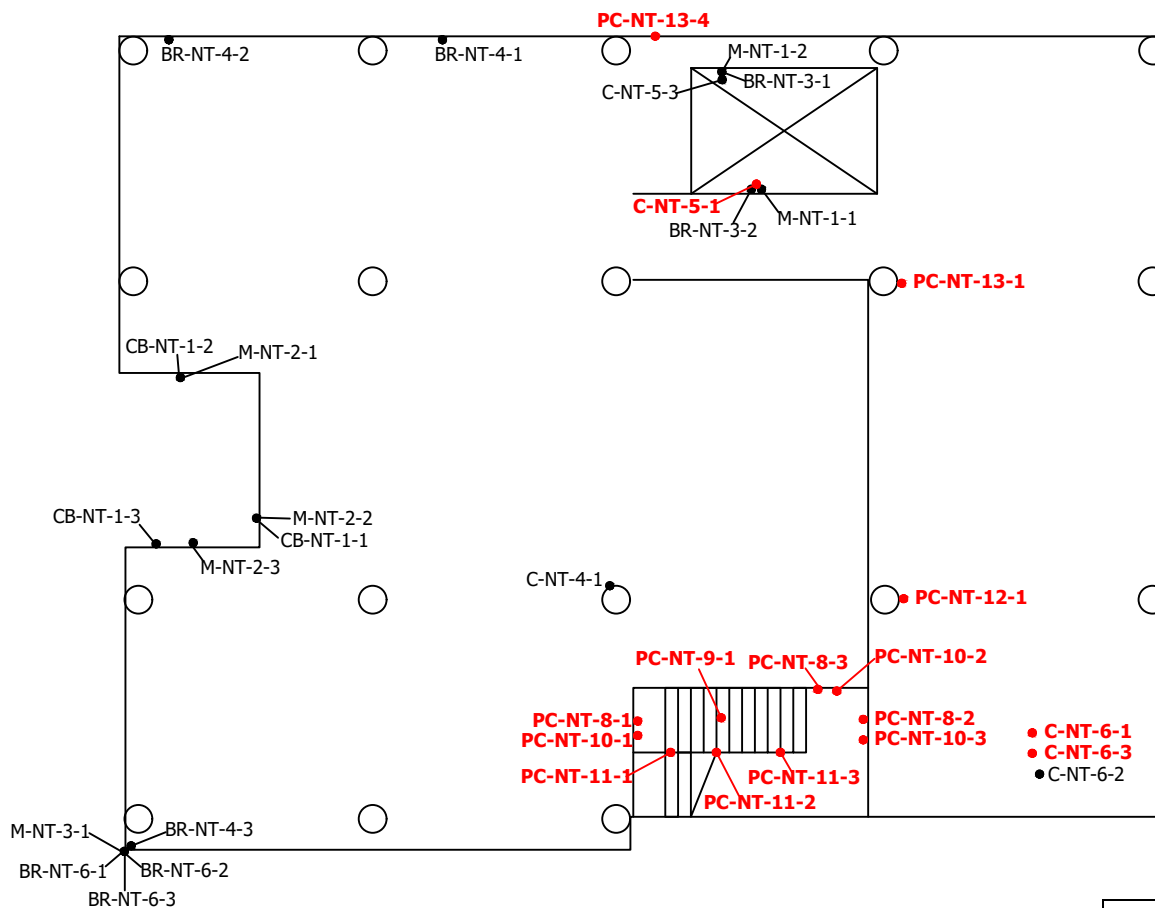
1455 E. Chestnut Expressway, Springfield, MO 65802

BULK SAMPLE LOCATIONS

MET CENTER - 6TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

4.4



LEGEND
● = BULK SAMPLE <1 PPM PCBs
● = BULK SAMPLE >1 PPM OF PCBs

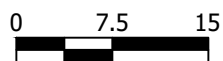
NORTH



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July 22, 2025

SCALE IN FEET



APPROXIMATE



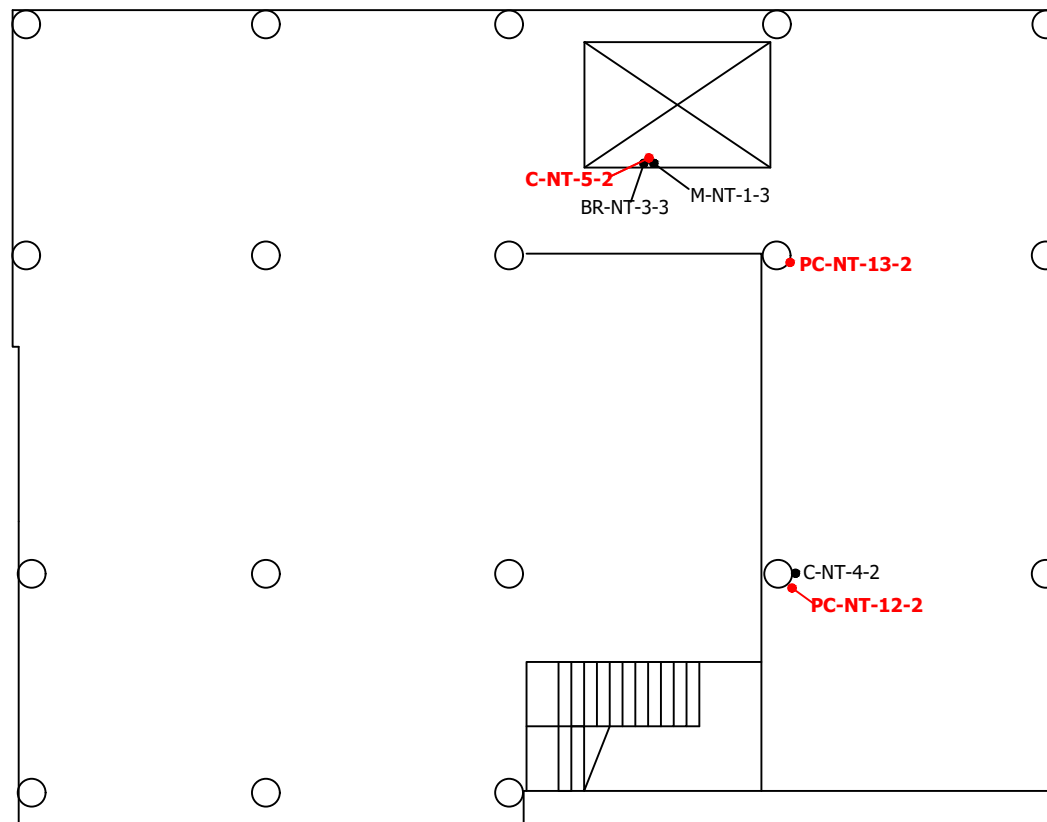
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Kansas City, MO 64108
Phone: (816) 285-8410

BULK SAMPLE LOCATIONS

MET CENTER - NORTH TOWER - 1ST FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

4.5



LEGEND
● = BULK SAMPLE <1 PPM PCBs
● = BULK SAMPLE >1 PPM OF PCBs

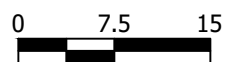
NORTH



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E.W.I. # 252049
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July 22, 2025

SCALE IN FEET



APPROXIMATE



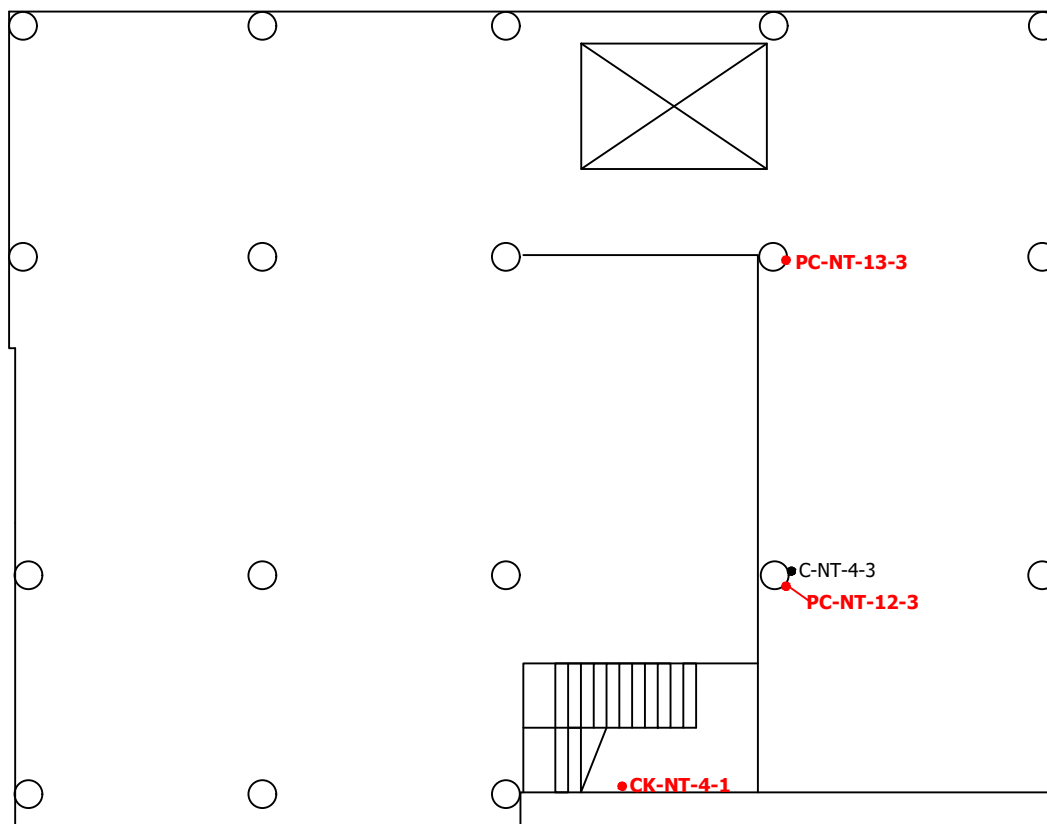
Kansas City Office Location:
1731 Locust Street
Kansas City, MO 64108
Phone: (816) 285-8410

BULK SAMPLE LOCATIONS

MET CENTER - NORTH TOWER - 2ND FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

4.6



LEGEND
● = BULK SAMPLE <1 PPM PCBs
● = BULK SAMPLE >1 PPM OF PCBs

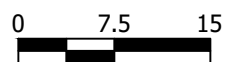
NORTH



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N. WISE

E.W.I. # 252049
DRAWN BY: HMC
July 22, 2025

SCALE IN FEET



APPROXIMATE



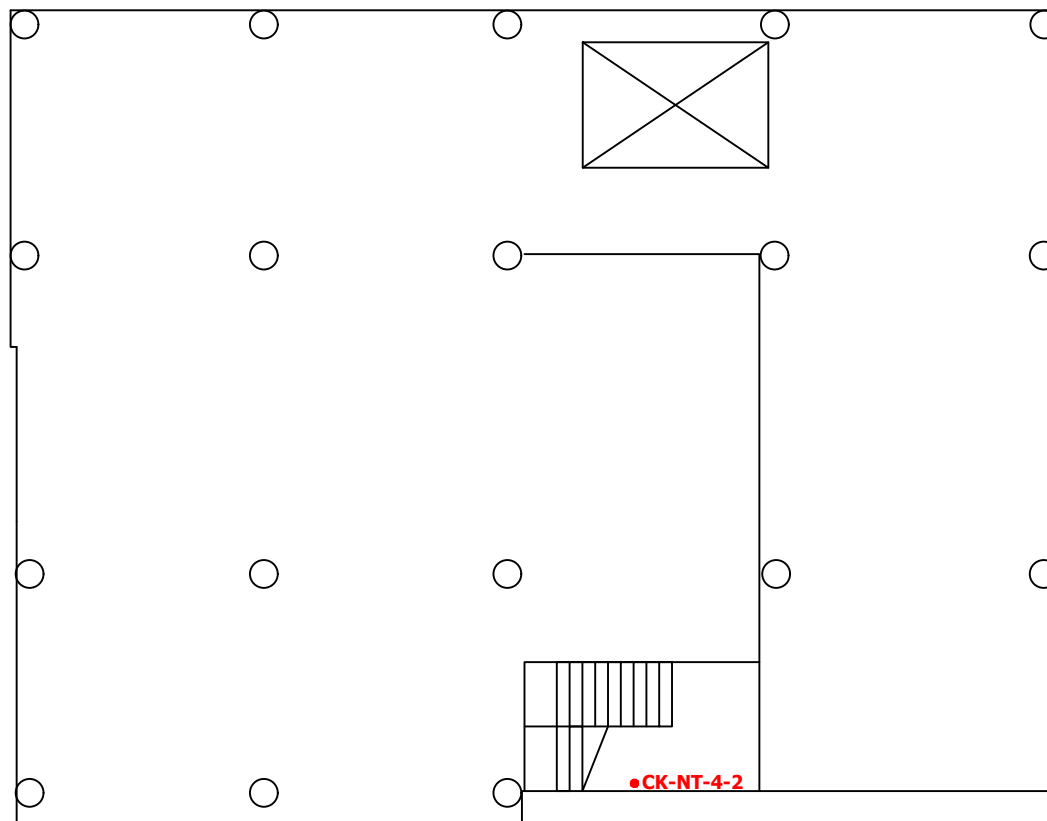
Kansas City Office Location:
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Kansas City, MO 64108
Phone: (816) 285-8410

BULK SAMPLE LOCATIONS

MET CENTER - NORTH TOWER - 3RD FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

4.7



LEGEND	
●	= BULK SAMPLE <1 PPM PCBs
●	= BULK SAMPLE >1 PPM OF PCBs

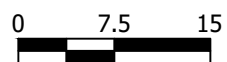
NORTH



CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HMC
Ver. 1: 6/27/25

SCALE IN FEET



APPROXIMATE



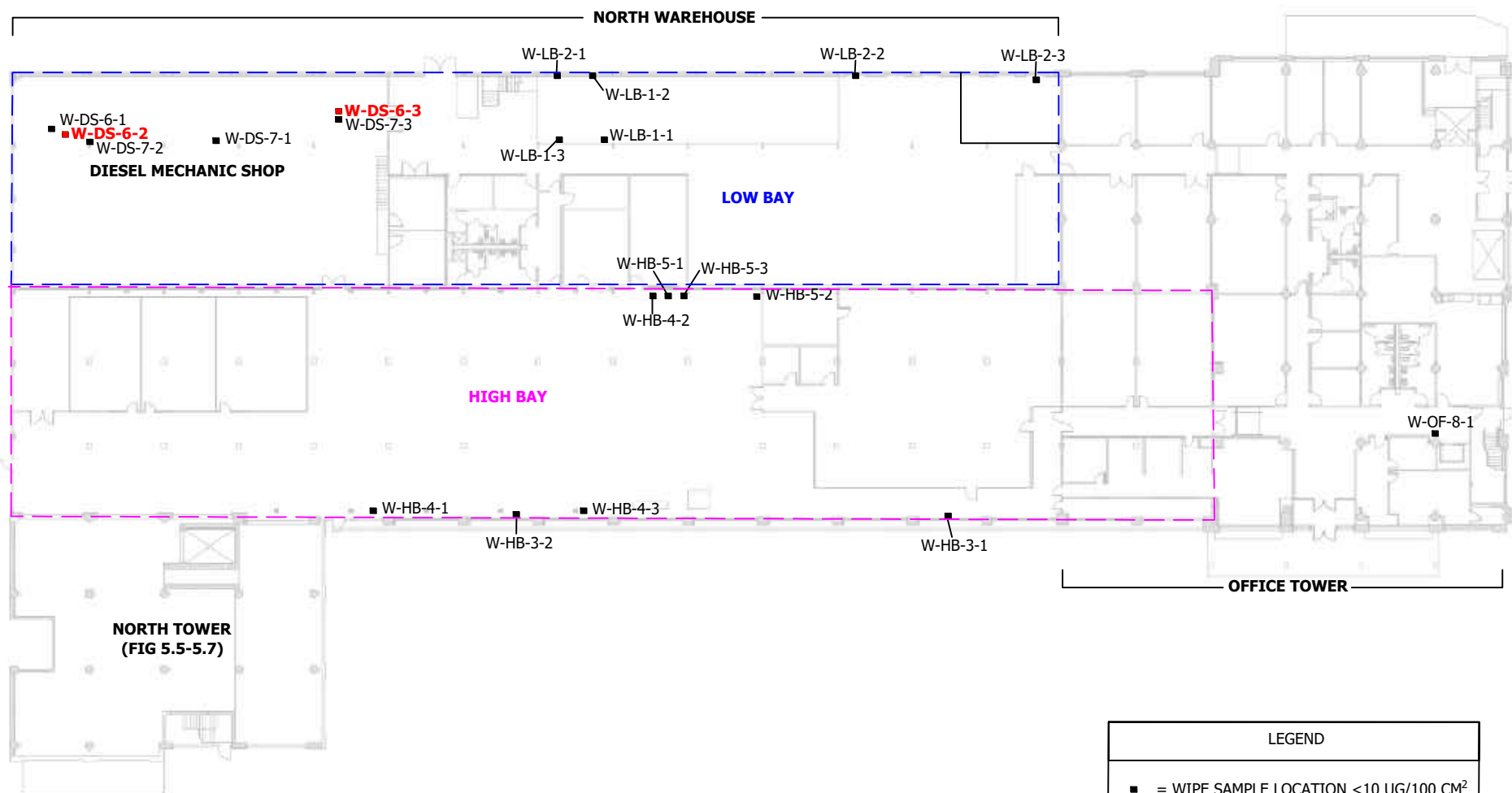
Kansas City Office Location:
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Kansas City, MO 64108
Phone: (816) 285-8410

BULK SAMPLE LOCATIONS

MET CENTER - NORTH TOWER - 4TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

4.8



LEGEND

- = WIPE SAMPLE LOCATION <10 UG/100 CM²
- = WIPE SAMPLE LOCATION >10 UG/100 CM²

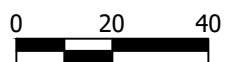
NORTH



CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HMC
July 22, 2025

SCALE IN FEET



APPROXIMATE



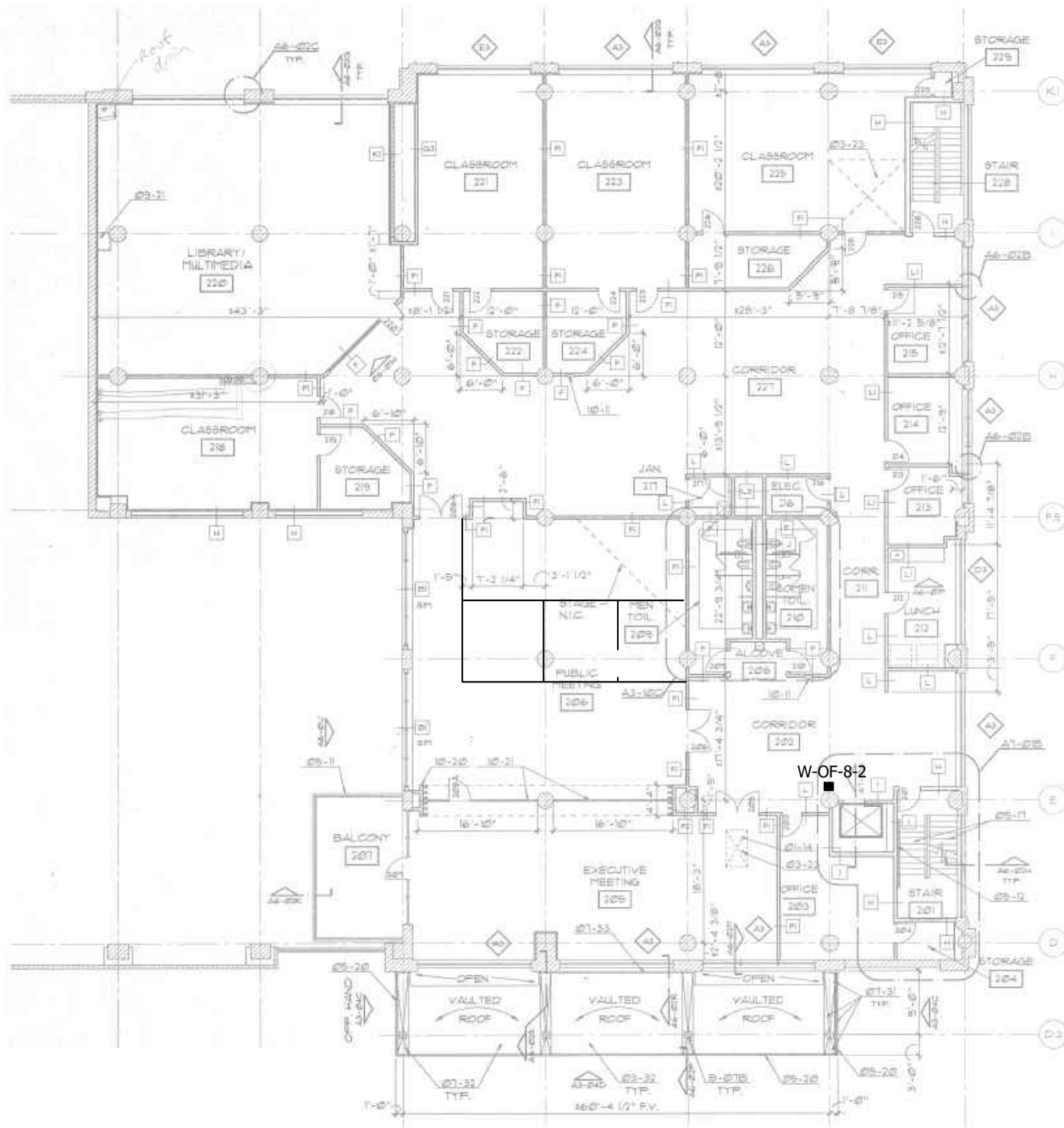
Kansas City Office Location:
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Kansas City, MO 64108
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WIPE SAMPLE LOCATIONS

MET CENTER - 1ST FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

5.0



NORTH



LEGEND

- = WIPE SAMPLE LOCATION <10 UG/100 CM²
- = WIPE SAMPLE LOCATION >10 UG/100 CM²

CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HMC
July 22, 2025

SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

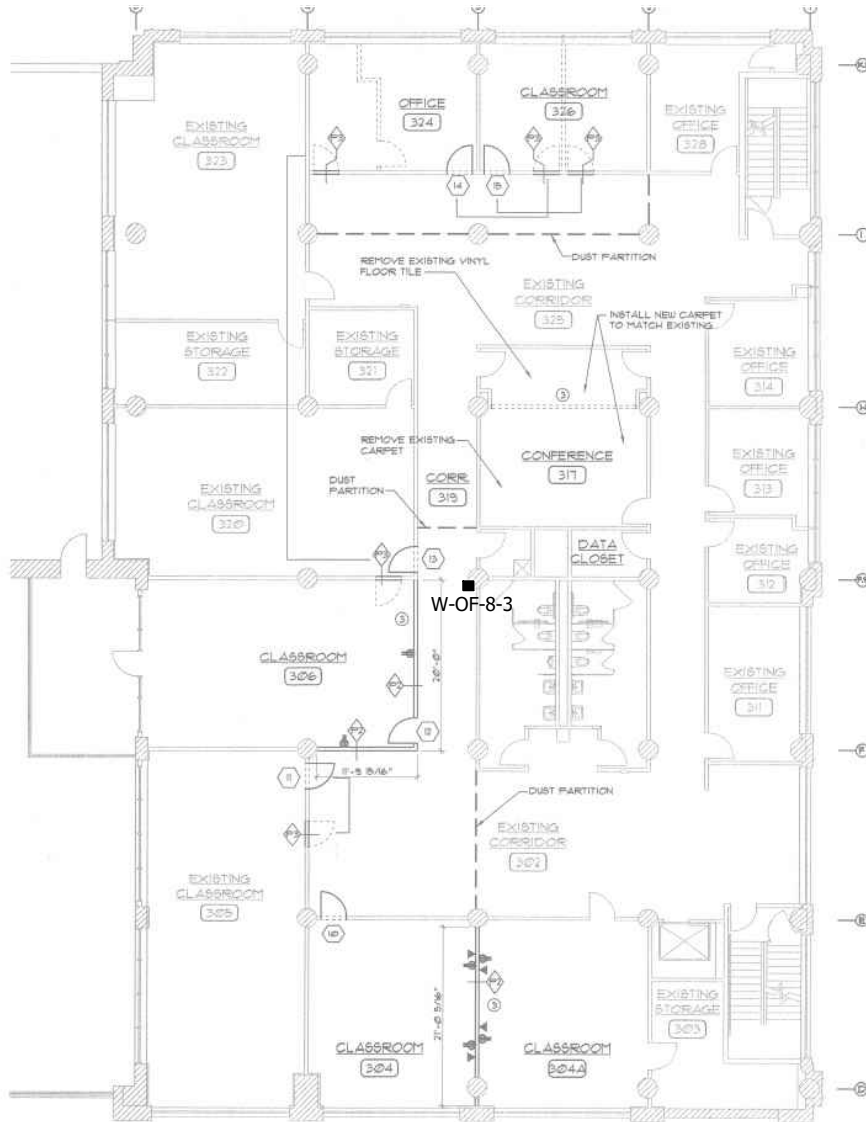
1455 E. Chestnut Expressway, Springfield, MO 65802

WIPE SAMPLE LOCATIONS

MET CENTER - 2ND FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

5.1



NORTH



LEGEND

- = WIPE SAMPLE LOCATION <10 UG/100 CM²
- = WIPE SAMPLE LOCATION >10 UG/100 CM²

CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HMC
July 22, 2025

SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

1455 E. Chestnut Expressway, Springfield, MO 65802

WIPE SAMPLE LOCATIONS

MET CENTER - 3RD FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

5.2



NORTH



LEGEND

- = WIPE SAMPLE LOCATION <10 UG/100 CM²
- = WIPE SAMPLE LOCATION >10 UG/100 CM²

CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HMC
July 22, 2025

SCALE IN FEET

0 10 20



APPROXIMATE



ENVIRONMENTAL WORKS

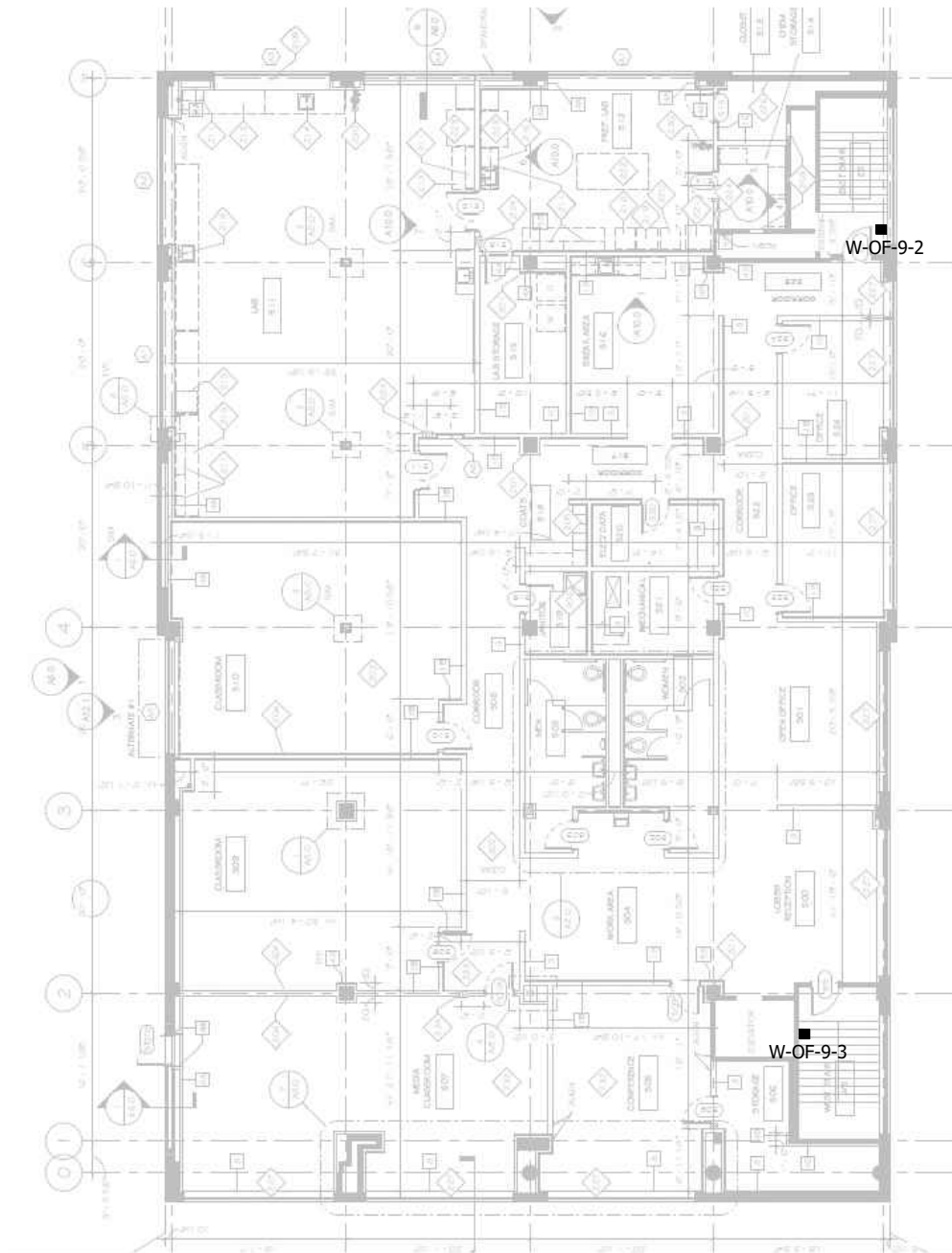
1455 E. Chestnut Expressway, Springfield, MO 65802

WIPE SAMPLE LOCATIONS

MET CENTER - 4TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

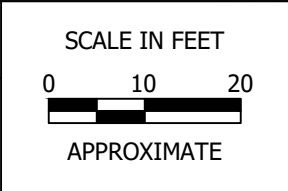
5.3



LEGEND	
■	= WIPE SAMPLE LOCATION <10 UG/100 CM ²
■	= WIPE SAMPLE LOCATION >10 UG/100 CM ²

CHECKED BY:
N. WISE

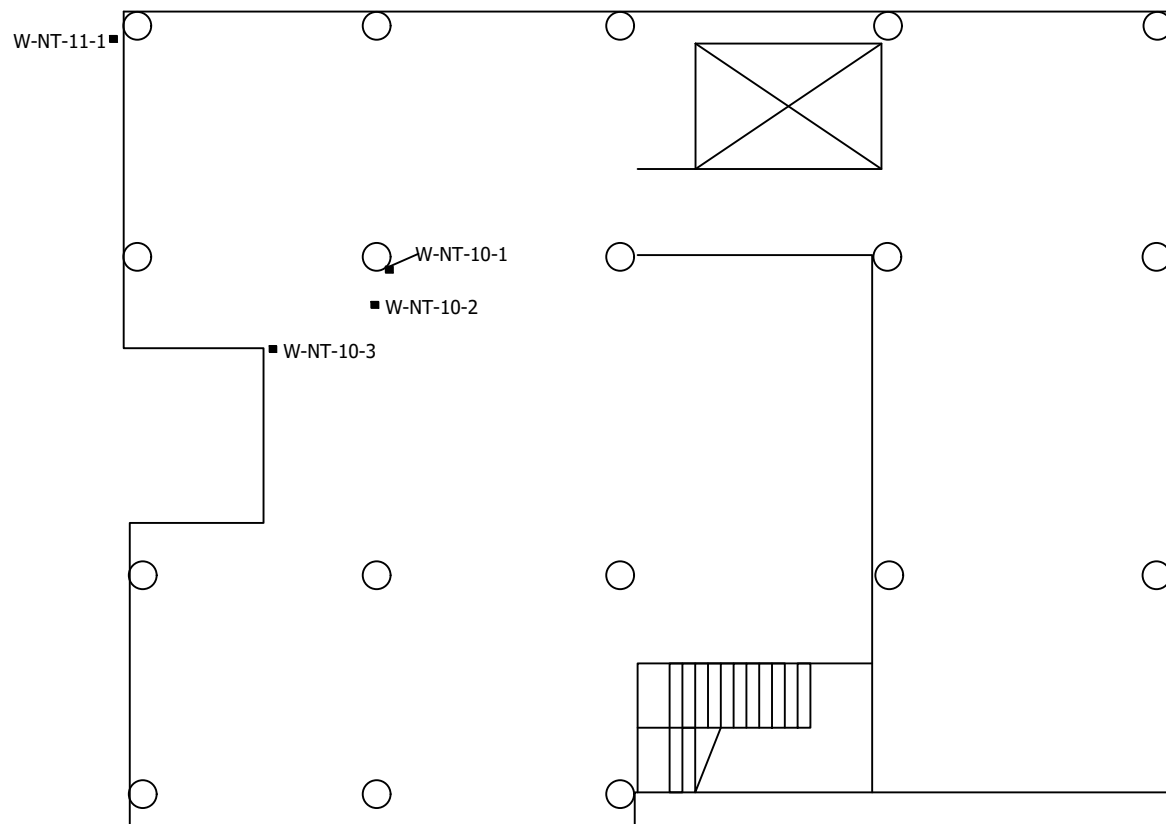
E.W.I. # 252049
DRAWN BY: HMC
July 22, 2025



WIPE SAMPLE LOCATIONS

MET CENTER - 5TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE
5.4



LEGEND	
■	= WIPE SAMPLE LOCATION <10 UG/100 CM ²
■	= WIPE SAMPLE LOCATION >10 UG/100 CM ²

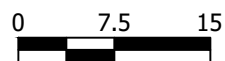
NORTH



CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HMC
July 22, 2025

SCALE IN FEET



APPROXIMATE



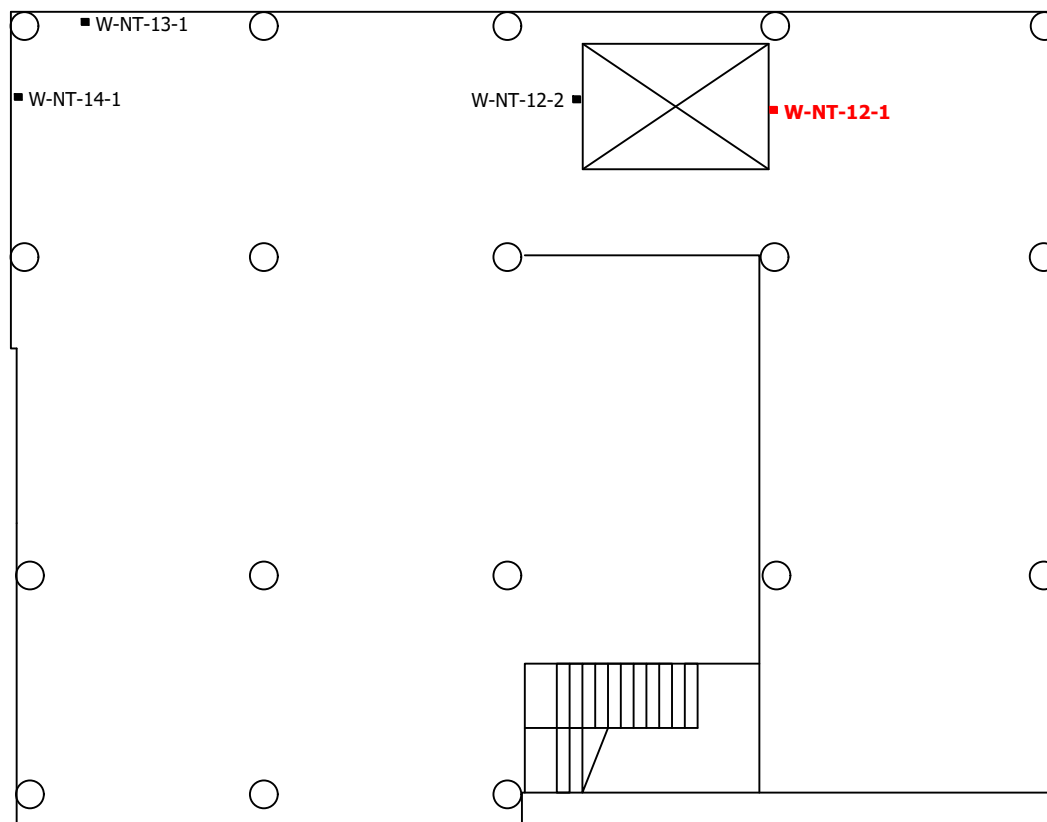
Kansas City Office Location:
1731 Locust Street
Kansas City, MO 64108
Phone: (816) 285-8410

WIPE SAMPLE LOCATIONS

MET CENTER - NORTH TOWER - 1ST FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

5.5



LEGEND	
■	= WIPE SAMPLE LOCATION <10 UG/100 CM ²
■	= WIPE SAMPLE LOCATION >10 UG/100 CM ²

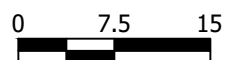
NORTH



CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HMC
July 22, 2025

SCALE IN FEET



APPROXIMATE



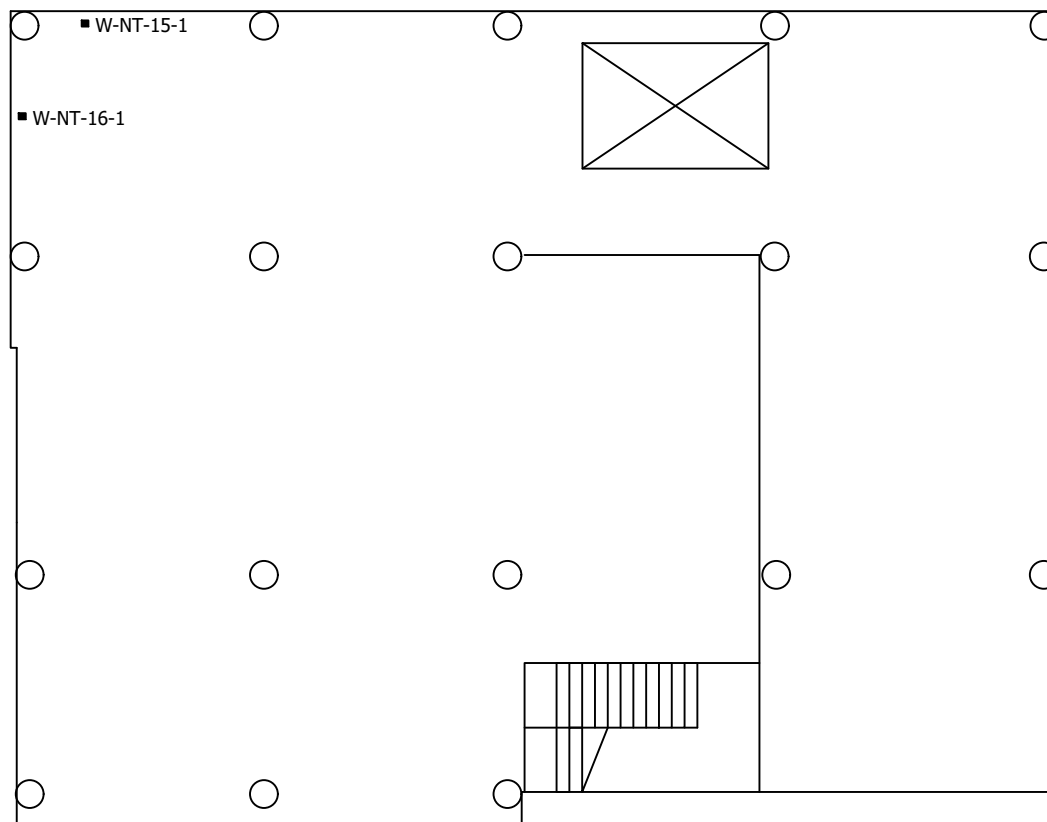
Kansas City Office Location:
1731 Locust Street
Kansas City, MO 64108
Phone: (816) 285-8410

WIPE SAMPLE LOCATIONS

MET CENTER - NORTH TOWER - 2ND FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

5.6



LEGEND	
■	= WIPE SAMPLE LOCATION <10 UG/100 CM ²
■	= WIPE SAMPLE LOCATION >10 UG/100 CM ²

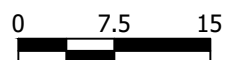
NORTH



CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HMC
July 22, 2025

SCALE IN FEET



APPROXIMATE



Kansas City Office Location:
1731 Locust Street
Kansas City, MO 64108
Phone: (816) 285-8410

WIPE SAMPLE LOCATIONS

MET CENTER - NORTH TOWER - 3RD FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

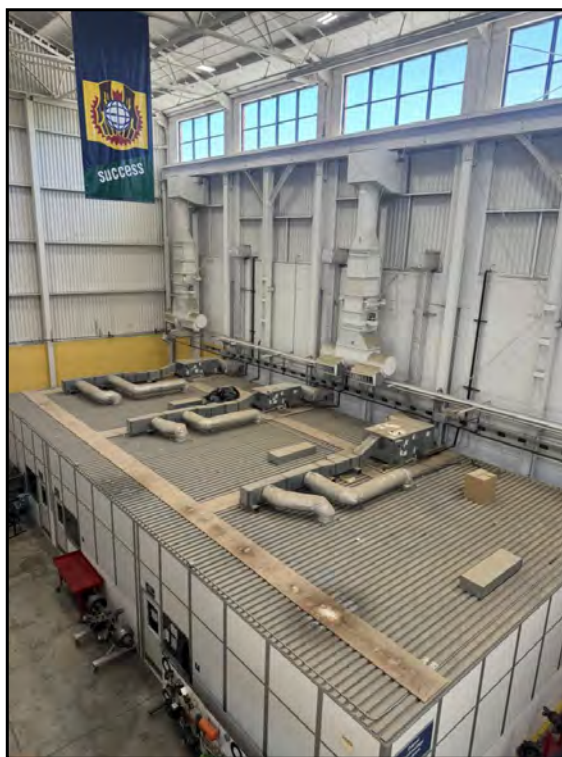
5.7

APPENDIX A

Photographic Documentation



1: Overview of high bay looking south from the central portion.



2: Overview of high bay looking northeast from the central portion. Split HVAC systems for the classrooms are visible.



3: View looking towards the former Building 9A area and mezzanine in the low bay.



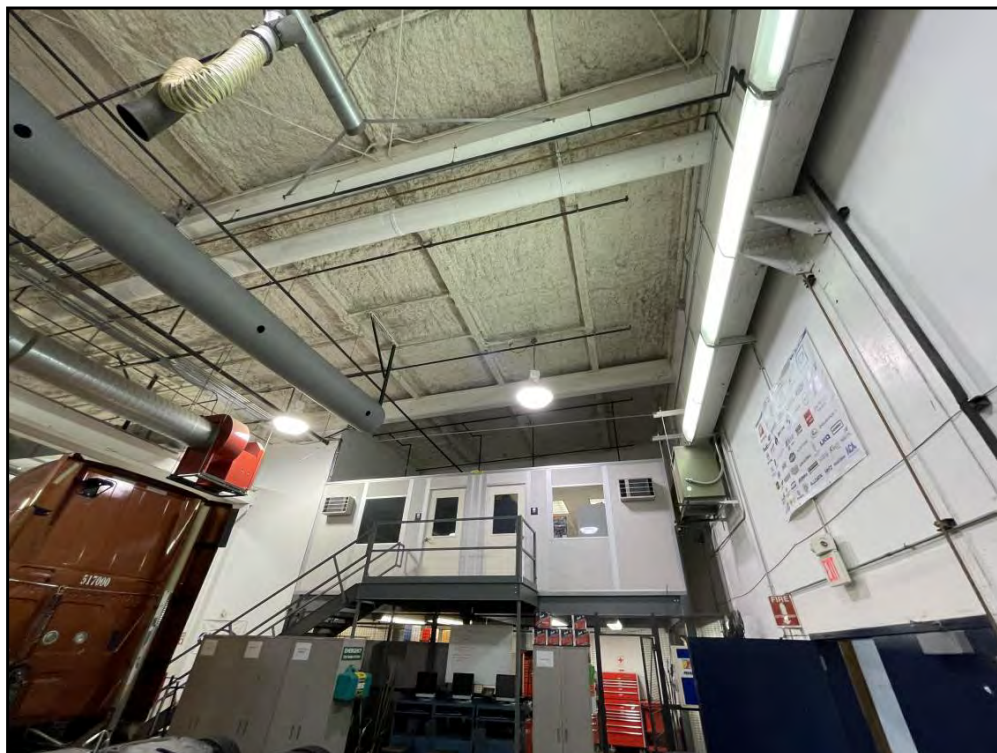
4: View of ceiling construction, cross beams and vertical I-beams in low bay.



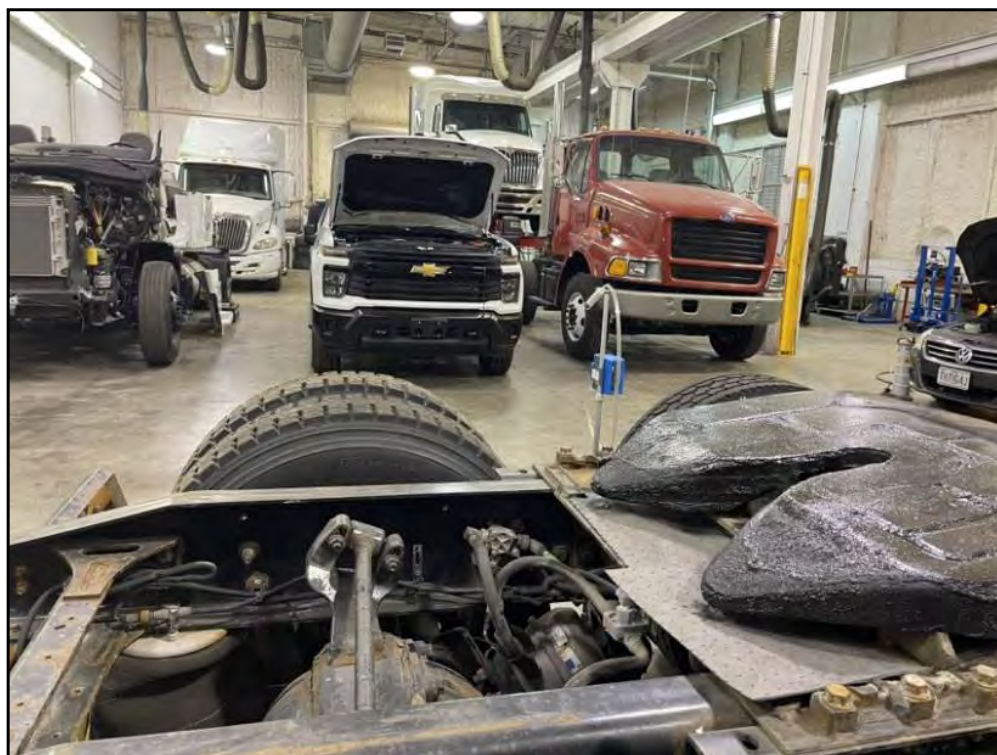
5: View of corridor between low and high bays.



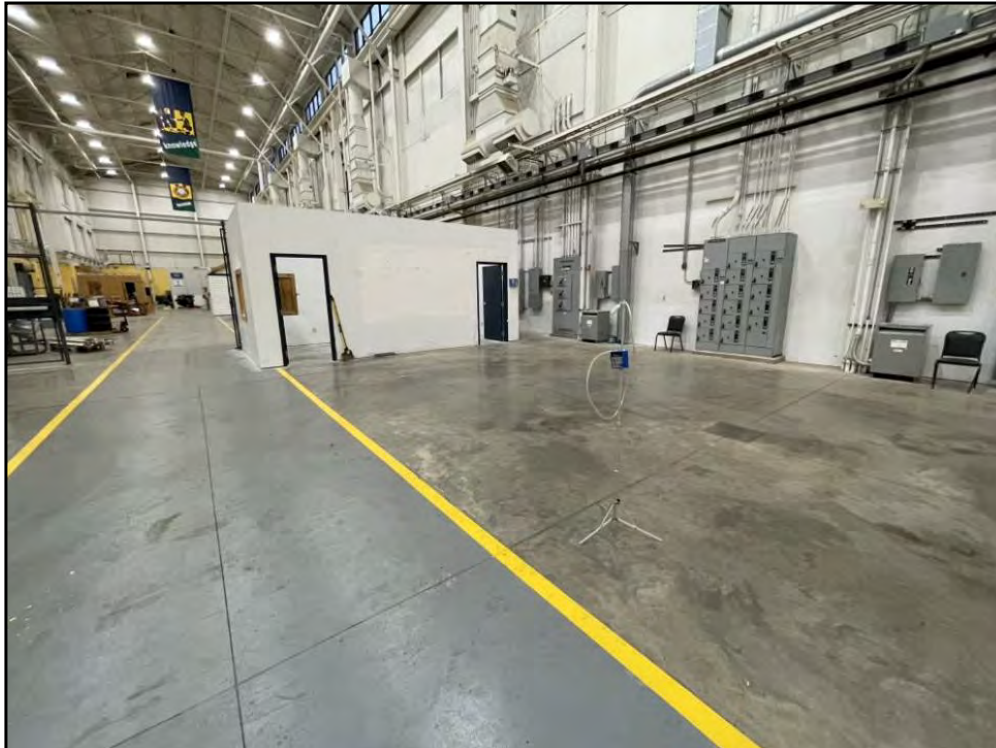
6: View of diesel shop area in low bay.



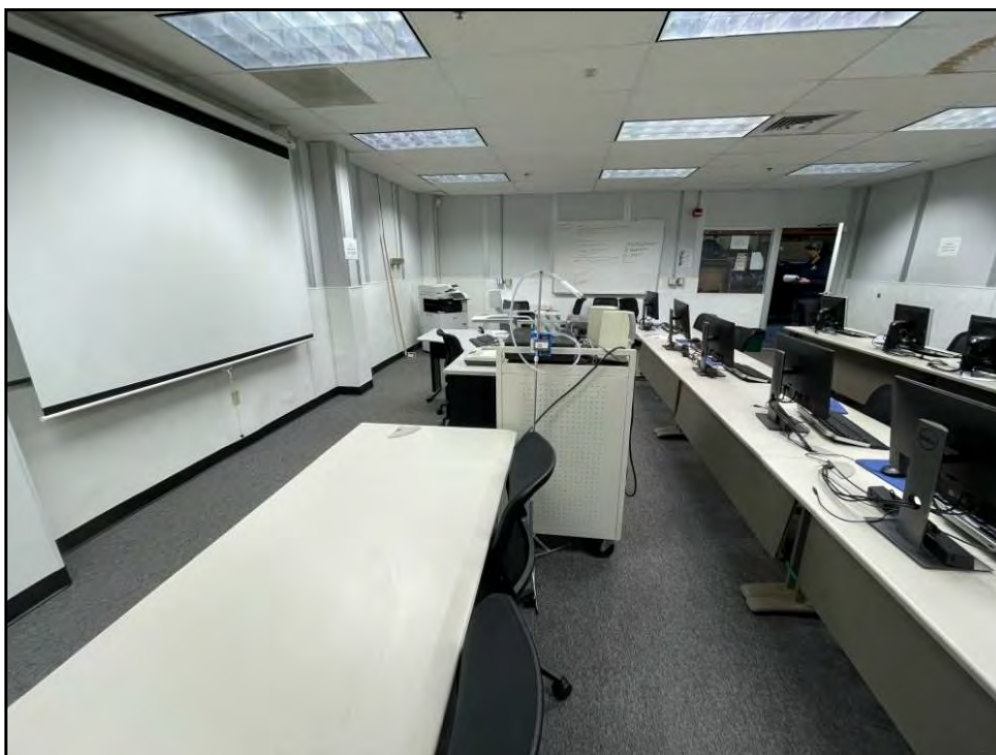
7: View of diesel shop looking towards the office spaces.



8: View of indoor air sampling in diesel shop (IA-1-LB-N).



9: View of indoor air sampling in high bay (IA-1-HB-S).



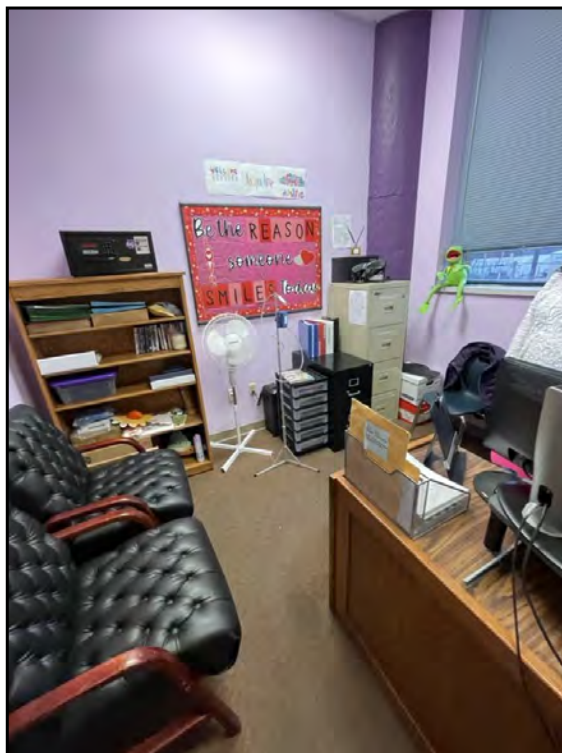
10: View of indoor air sampling in high bay classrooms (IA-1-HB-CL).



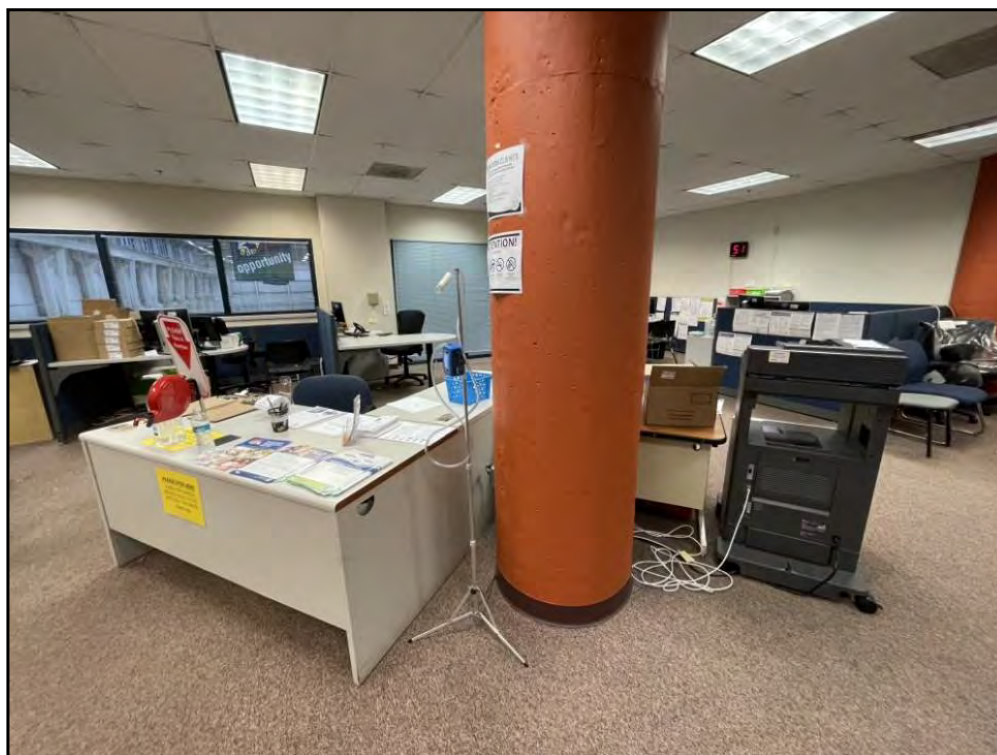
11: View of indoor air sampling in low bay (IA-1-LB-M and DUP).



12: View of indoor air sampling in low bay vacant office (IA-1-LB-S).



13: View of indoor air sampling in 2nd floor office space (IA-2-E).



14: View of indoor air sampling in 3rd floor office space (IA-3-W).



15: View of historical FLBs in former Building 9A/low bay.



16: View of 10'x10' floor grid in the low bay/small transformer area.



17: View of concrete coring activities in the high bay/large transformer area.



18: View of CF-OF-1 in 1st floor office area.



19: View of CF-ST-1 in low bay/small transformer area.



20: View of CF-LT-4 in the high bay/large transformer area.



21: View of CF-SW-1 in high bay/south warehouse with epoxy seal.



22: View of expansion joint along exterior walls of low bay (CK-LB-1-1).



23: View of floor tile located in corridor between low and high bays (FT-LB-1-1).



24: View of DW-LB-1-1 and C-LB-3-3 in low bay.



25: View of concrete pillar paint (PC-LB-1-1) and corresponding concrete sample (C-LB-1-1).



26: View of concrete pillar paint (PC-OF-1-3) collected from pillar on the 2nd floor.



27: View of paint on ceilings/cross beams in low bay (PC-LB-2-3).



28: View of paint on vertical I-beams in low bay (PC-LB-3-1).



29: View of paint on east exterior brick wall in low bay (PC-LB-4-1).



30: View of historical FLBs in diesel shop.



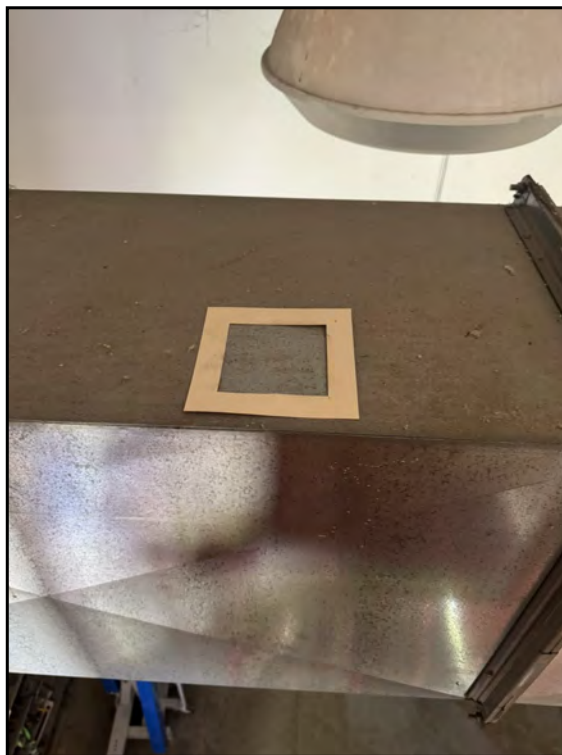
31: View of paint on vertical I-beams in diesel shop (PC-DS-3-3).



32: View of insulation in former window wells of diesel shop (I-DS-1-1).



33: View of W-DS-6-2 wipe sample on ducts in diesel shop.



34: View of W-DS-6-3 wipe sample on ducts in diesel shop.



35: View of expansion joint along exterior walls of high bay (CK-HB-1-3).



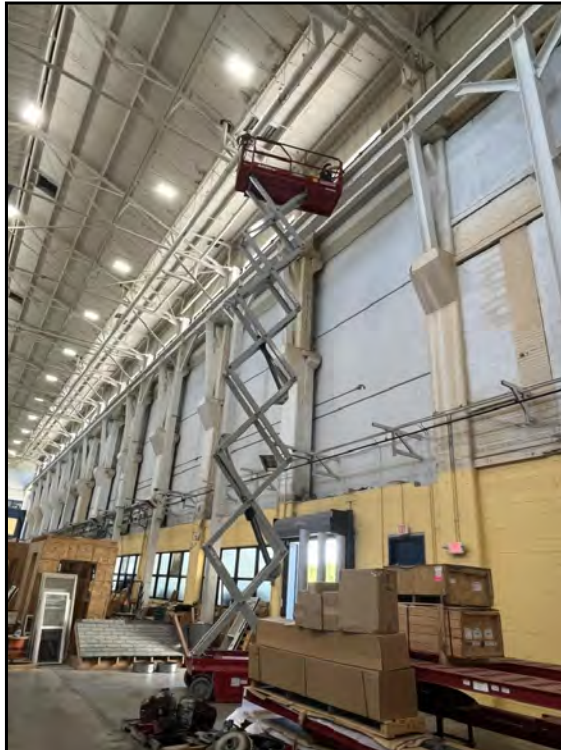
36: View of concrete column (C-HB-2-2) along west wall of high bay.



37: View of paint on concrete columns along west wall of high bay (PC-HB-5-3).



38: View of paint on brick wall on south wall of the high bay (PC-HB-6-3).



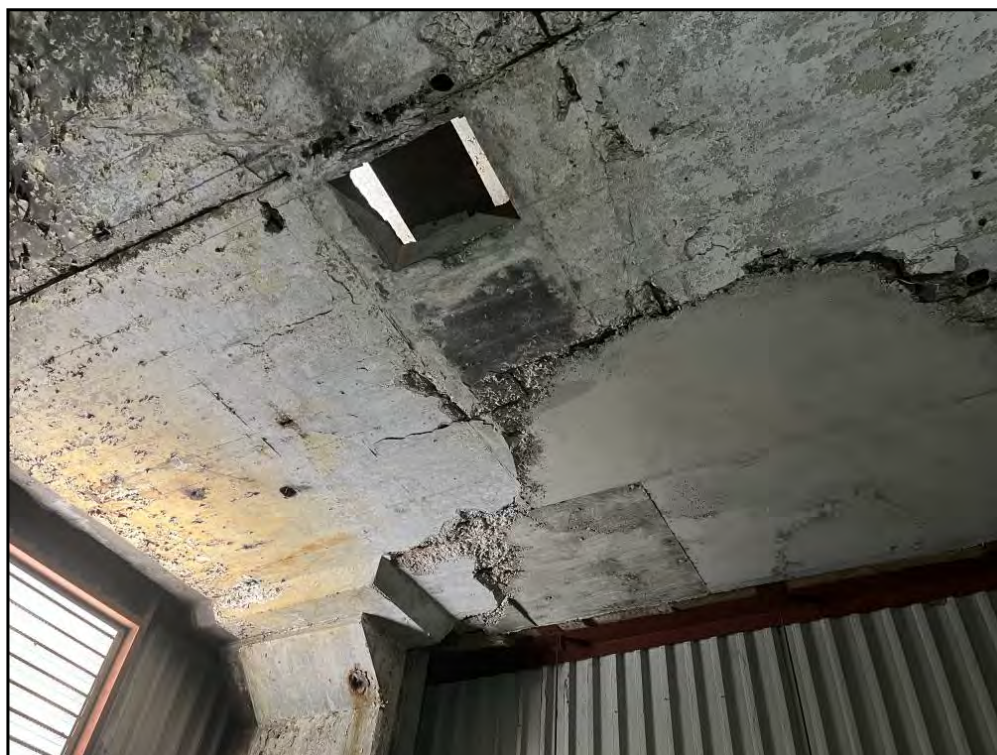
39: View of wipe sampling activities on cross beams in high bay.



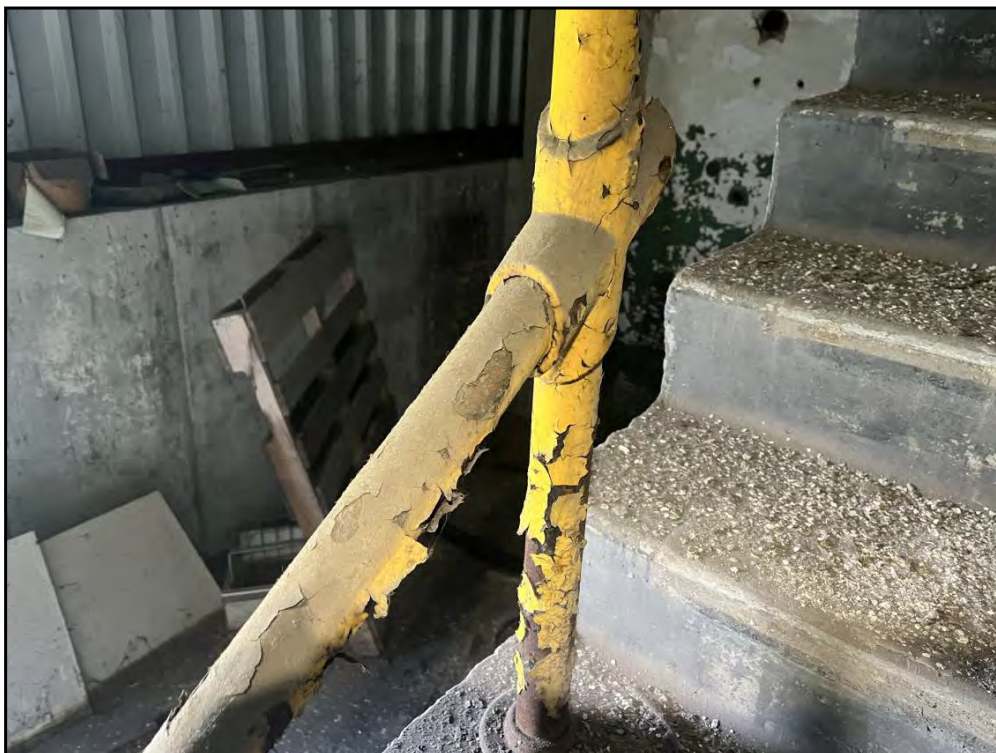
40: View of paint on plaster walls of the 6th floor office (PC-OF-7-1).



41: View of wipe sampling activities on concrete pillars in office areas.



42: View of crumbling concrete ceiling in north tower (C-NT-6-1 and C-NT-6-3).



43: View of paint on stairwell of north tower (PC-NT-11-1). Black stair riser paint is also visible (PC-NT-9-1).



44: View of concrete pillar paint in north tower (PC-NT-12-1).



45: View of stairwell wall paint in north tower (PC-NT-8-2 and PC-NT-10-3).



46: View of wipe sample area W-NT-12-1 on front of freight elevator on the 2nd floor of north tower.



47: Staged IDW in low bay pending analytical.

APPENDIX B

Waste Documentation

**NON-HAZARDOUS
WASTE MANIFEST**

1. Generator ID Number
CE5Q6

2. Page 1 of
1

3. Emergency Response Phone
636-333-2336

4. Waste Tracking Number

5. Generator's Name and Mailing Address
**Metropolitan Education And Training Center
120 S Central Avenue
St. Louis, MO 63105**

Generator's Site Address (if different than mailing address)
**6347 Plummer Avenue
Wellston, MO 63105**

Generator's Phone:

6. Transporter 1 Company Name

Environmental Works, Inc

U.S. EPA ID Number

100981728504

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address
**Terra Environmental
3600 South 1st St.
St. Louis, MO 63118**

U.S. EPA ID Number

Facility's Phone:

9. Waste Shipping Name and Description

10. Containers

No. Type

11. Total
Quantity

12. Unit
Wt/Vol.

1. **Decon Fluids**

1

DF

1

G

2.

3.

4.

13. Special Handling Instructions and Additional Information

Approval # : LAND - 2025 - 07 - 00202

Bill EWI PO: 252049

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offor's Printed/Typed Name

Nicole Wise

Signature

Nicole Wise

(as agent Per)

Month Day Year
10/21/25

15. International Shipments

☐ Import to U.S.

☐ Export from U.S.

Port of entry/exit:

Date leaving U.S.:

Transporter Signature (for exports only):

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name

Jonathan Boehme

Signature

J Boehme

Month Day Year
7/21/25

Transporter 2 Printed/Typed Name

Signature

Month Day Year

17. Discrepancy

17a. Discrepancy Indication Space

☐ Quantity

☐ Type

☐ Residue

☐ Partial Rejection

☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator)

U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator)

Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name

Michael McKenzie

Signature

Michael McKenzie

Month Day Year
7/21/25

**NON-HAZARDOUS
WASTE MANIFEST**

1. Generator ID Number
CES95

2. Page 1 of
1

3. Emergency Response Phone
636-333-3336

4. Waste Tracking Number

5. Generator's Name and Mailing Address
**Metropolitan Education and Training (MET) Center
120 S. Central Avenue
St. Louis, MO 63105**

Generator's Site Address (if different than mailing address)
**6347 Plymouth Avenue
Wellman, MO 63105**

Generator's Phone:

6. Transporter 1 Company Name

Environmental Works Inc.

U.S. EPA ID Number

MOB98728504

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address
**Terra Environmental
3600 South 14 St.
St. Louis, MO 63118**

U.S. EPA ID Number

Facility's Phone:

9. Waste Shipping Name and Description

1. **Spent PPE & HEPA Filters**

10. Containers

No.

Type

11. Total
Quantity

12. Unit
Wt/Vol.

1

Drum

50

lbs.

2.

3.

4.

13. Special Handling Instructions and Additional Information

Approval # LAND-2025-07-00201

Bill EWS PO: 252049

**(Weigh in 5500 lbs)
(Weigh out 5440 lbs)**

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Officer's Printed/Typed Name

Nicole Wise

(as agent for)

Signature

Nicole Wise

Month Day Year
07 21 25

15. International Shipments

☐ Import to U.S.

☐ Export from U.S.

Port of entry/exit:

Date leaving U.S.:

Transporter Signature (for exports only):

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name

Jonathan Backme

Signature

JB

Month Day Year
7 21 25

Transporter 2 Printed/Typed Name

Signature

Month Day Year

17. Discrepancy

17a. Discrepancy Indication Space

☐ Quantity

☐ Type

☐ Residue

☐ Partial Rejection

☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator)

U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator)

Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in item 17a

Printed/Typed Name

Michael McKeown

Signature

Michael McKeown

Month Day Year
7 21 25



THIRD PARTY SIGNATURE AUTHORIZATION for Special Waste Disposal

Date: **July 17, 2025**

This Authorization is only valid for 3 years
from the above date.

To Whom It May Concern:

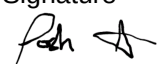
Please be advised that the following company/individual has been appointed to work as our agent for purposes of managing waste materials that we may generate.

Name of Authorized Agent Nicole Wise	Title Senior Project Manager
Name of Company Environmental Works, Inc.	Telephone Number 816-285-8427

The above broker/individual is authorized to act as our authorized agent for the following purposes:

- ☒ Complete and sign Special Waste Profile.
- ☒ Complete and sign Special Waste Profile-Recertification.
- ☒ Authorize amendments to Special Waste Profile.
- ☒ Sign contracts to dispose and/or transport material.
- ☒ Sign certifications necessary to comply with landfill requirements.
- ☒ Sign manifests to initiate shipment to disposal facilities.

Our authorized agent will notify us prior to any action stated above, and will provide us with copies of any documents bearing our name.

Name of Company LCRA c/o STL Economic Development Partnership	Mailing Address 120 S. Central, Suite 200, St. Louis, MO 63105
Generator Contact (Print Name) Josh Ayers	Title Chief Financial Officer
Signature 	Telephone Number 3146157663

July 08, 2025

Nicole Wise
Environmental Works, Inc.
1731 Locust Street
Kansas City, MO 64108
TEL: (816) 285-8410
FAX:



Illinois	100226
Illinois	1004652024-2
Kansas	E-10438
Kansas	E-10374
Louisiana	05002
Louisiana	05003
Oklahoma	9978

RE: 252049 MET Center

WorkOrder: 25062312

Dear Nicole Wise:

TEKLAB, INC received 2 samples on 6/26/2025 4:31:00 PM for the analysis presented in the following report.

Samples are analyzed on an as received basis unless otherwise requested and documented. The sample results contained in this report relate only to the requested analytes of interest as directed on the chain of custody. NELAP accredited fields of testing are indicated by the letters NELAP under the Certification column. Unless otherwise documented within this report, Teklab Inc. analyzes samples utilizing the most current methods in compliance with 40CFR. All tests are performed in the Collinsville, IL laboratory unless otherwise noted in the Case Narrative.

All quality control criteria applicable to the test methods employed for this project have been satisfactorily met and are in accordance with NELAP except where noted. The following report shall not be reproduced, except in full, without the written approval of Teklab, Inc.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,



Paul Schultz
Project Manager

Pschultz@teklabinc.com



Report Contents

<http://www.teklabinc.com/>

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

This reporting package includes the following:

Cover Letter	1
Report Contents	2
Definitions	3
Case Narrative	5
Accreditations	6
Laboratory Results	7
Quality Control Results	9
Receiving Check List	17
Chain of Custody	Appended

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

Abbr Definition

* Analytes on report marked with an asterisk are not NELAP accredited

CCV Continuing calibration verification is a check of a standard to determine the state of calibration of an instrument between recalibration.

CRQL A Client Requested Quantitation Limit is a reporting limit that varies according to customer request. The CRQL may not be less than the MDL.

DF Dilution factor is the dilution performed during analysis only and does not take into account any dilutions made during sample preparation. The reported result is final and includes all dilution factors.

DNI Did not ignite

DUP Laboratory duplicate is a replicate aliquot prepared under the same laboratory conditions and independently analyzed to obtain a measure of precision.

ICV Initial calibration verification is a check of a standard to determine the state of calibration of an instrument before sample analysis is initiated.

IDPH IL Dept. of Public Health

LCS Laboratory control sample is a sample matrix, free from the analytes of interest, spiked with verified known amounts of analytes and analyzed exactly like a sample to establish intra-laboratory or analyst specific precision and bias or to assess the performance of all or a portion of the measurement system.

LCSD Laboratory control sample duplicate is a replicate laboratory control sample that is prepared and analyzed in order to determine the precision of the approved test method. The acceptable recovery range is listed in the QC Package (provided upon request).

MBLK Method blank is a sample of a matrix similar to the batch of associated sample (when available) that is free from the analytes of interest and is processed simultaneously with and under the same conditions as samples through all steps of the analytical procedures, and in which no target analytes or interferences should present at concentrations that impact the analytical results for sample analyses.

MDL "The method detection limit is defined as the minimum measured concentration of a substance that can be reported with 99% confidence that the measured concentration is distinguishable from method blank results."

MS Matrix spike is an aliquot of matrix fortified (spiked) with known quantities of specific analytes that is subjected to the entire analytical procedures in order to determine the effect of the matrix on an approved test method's recovery system. The acceptable recovery range is listed in the QC Package (provided upon request).

MSD Matrix spike duplicate means a replicate matrix spike that is prepared and analyzed in order to determine the precision of the approved test method. The acceptable recovery range is listed in the QC Package (provided upon request).

MW Molecular weight

NC Data is not acceptable for compliance purposes

ND Not Detected at the Reporting Limit

NELAP NELAP Accredited

PQL Practical quantitation limit means the lowest level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operation conditions.

RL The reporting limit the lowest level that the data is displayed in the final report. The reporting limit may vary according to customer request or sample dilution. The reporting limit may not be less than the MDL.

RPD Relative percent difference is a calculated difference between two recoveries (ie. MS/MSD). The acceptable recovery limit is listed in the QC Package (provided upon request).

SPK The spike is a known mass of target analyte added to a blank sample or sub-sample; used to determine recovery deficiency or for other quality control purposes.

Surr Surrogates are compounds which are similar to the analytes of interest in chemical composition and behavior in the analytical process, but which are not normally found in environmental samples.

TIC Tentatively identified compound: Analytes tentatively identified in the sample by using a library search. Only results not in the calibration standard will be reported as tentatively identified compounds. Results for tentatively identified compounds that are not present in the calibration standard, but are assigned a specific chemical name based upon the library search, are calculated using total peak areas from reconstructed ion chromatograms and a response factor of one. The nearest Internal Standard is used for the calculation. The results of any TICs must be considered estimated, and are flagged with a "T". If the estimated result is above the calibration range it is flagged "ET"

TNTC Too numerous to count (> 200 CFU)

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

Qualifiers

# - Unknown hydrocarbon	B - Analyte detected in associated Method Blank
C - RL shown is a Client Requested Quantitation Limit	E - Value above quantitation range
H - Holding times exceeded	I - Associated internal standard was outside method criteria
J - Analyte detected below quantitation limits	M - Manual Integration used to determine area response
ND - Not Detected at the Reporting Limit	R - RPD outside accepted recovery limits
S - Spike Recovery outside recovery limits	T - TIC(Tentatively identified compound)
X - Value exceeds Maximum Contaminant Level	



Case Narrative

<http://www.teklabinc.com/>

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

Cooler Receipt Temp: 7.1 °C

Locations

Collinsville

Address 5445 Horseshoe Lake Road
Collinsville, IL 62234-7425
Phone (618) 344-1004
Fax (618) 344-1005
Email jhriley@teklabinc.com

Collinsville Air

Address 5445 Horseshoe Lake Road
Collinsville, IL 62234-7425
Phone (618) 344-1004
Fax (618) 344-1005
Email EHurley@teklabinc.com

Springfield

Address 3920 Pintail Dr
Springfield, IL 62711-9415
Phone (217) 698-1004
Fax (217) 698-1005
Email KKlostermann@teklabinc.com

Chicago

Address 1319 Butterfield Rd.
Downers Grove, IL 60515
Phone (630) 324-6855
Fax
Email arenner@teklabinc.com

Kansas City

Address 8421 Nieman Road
Lenexa, KS 66214
Phone (913) 541-1998
Fax (913) 541-1998
Email jhriley@teklabinc.com

Client: Environmental Works, Inc.**Work Order:** 25062312**Client Project:** 252049 MET Center**Report Date:** 08-Jul-25

State	Dept	Cert #	NELAP	Exp Date	Lab
Illinois	IEPA	100226	NELAP	1/31/2026	Collinsville
Illinois	IEPA	1004652024-2	NELAP	4/30/2026	Collinsville
Kansas	KDHE	E-10438	NELAP	7/31/2026	Collinsville
Kansas	KDHE	E-10374	NELAP	4/30/2026	Collinsville
Louisiana	LDEQ	05002	NELAP	6/30/2026	Collinsville
Louisiana	LDEQ	05003	NELAP	6/30/2026	Collinsville
Oklahoma	ODEQ	9978	NELAP	8/31/2025	Collinsville
Arkansas	ADEQ	88-0966		3/14/2026	Collinsville
Illinois	IDPH	17584		5/31/2025	Collinsville
Iowa	IDNR	430		6/1/2026	Collinsville
Kentucky	KWLCP	KY98050		12/31/2025	Collinsville
Kentucky	KWLCP	KY98006		12/31/2025	Collinsville
Kentucky	UST	0073		1/31/2026	Collinsville
Mississippi	MSDH			4/30/2026	Collinsville
Missouri	MDNR	930		1/31/2028	Collinsville
Missouri	MDNR	00930		10/31/2026	Collinsville



Laboratory Results

<http://www.teklabinc.com/>

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

Lab ID: 25062312-001

Client Sample ID: MET-L-20250626

Matrix: AQUEOUS

Collection Date: 06/26/2025 13:48

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Batch
STANDARD METHOD 4500-H B 2000, 2011, LABORATORY ANALYZED								
Lab pH	NELAP	1.00	H	10.2		1	06/30/2025 13:25	R367415
SW-846 1020B								
Ignitability, Closed Cup	NELAP	60		>200	°F	1	07/02/2025 13:31	R367571
SW-846 3510C, 8082A, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD								
Aroclor 1016	NELAP	0.00200		ND	mg/L	1	07/02/2025 19:30	241187
Aroclor 1221	NELAP	0.00200		ND	mg/L	1	07/02/2025 19:30	241187
Aroclor 1232	NELAP	0.00200		ND	mg/L	1	07/02/2025 19:30	241187
Aroclor 1242	NELAP	0.00200		ND	mg/L	1	07/02/2025 19:30	241187
Aroclor 1248	NELAP	0.00200		ND	mg/L	1	07/02/2025 19:30	241187
Aroclor 1254	NELAP	0.00200		ND	mg/L	1	07/02/2025 19:30	241187
Aroclor 1260	NELAP	0.00200		ND	mg/L	1	07/02/2025 19:30	241187
Surr: Decachlorobiphenyl	*	1-156		2.9	%REC	1	07/02/2025 19:30	241187
Surr: Tetrachloro-meta-xylene	*	38.9-133		60.5	%REC	1	07/02/2025 19:30	241187
<i>Elevated reporting limit due to sample composition.</i>								
SW-846 1311, 5030B, 8260B, VOLATILE ORGANIC COMPOUNDS IN TCLP EXTRACT BY GC/MS								
1,1-Dichloroethene	NELAP	0.400		ND	mg/L	200	07/02/2025 18:29	241408
1,2-Dichloroethane	NELAP	0.400		ND	mg/L	200	07/02/2025 18:29	241408
1,4-Dichlorobenzene	NELAP	0.400		ND	mg/L	200	07/02/2025 18:29	241408
2-Butanone	NELAP	2.00		ND	mg/L	200	07/02/2025 18:29	241408
Benzene	NELAP	0.100		ND	mg/L	200	07/02/2025 18:29	241408
Carbon tetrachloride	NELAP	0.400		ND	mg/L	200	07/02/2025 18:29	241408
Chlorobenzene	NELAP	0.400		ND	mg/L	200	07/02/2025 18:29	241408
Chloroform	NELAP	0.400		ND	mg/L	200	07/02/2025 18:29	241408
Tetrachloroethene	NELAP	0.100		ND	mg/L	200	07/02/2025 18:29	241408
Trichloroethene	NELAP	0.400		ND	mg/L	200	07/02/2025 18:29	241408
Vinyl chloride	NELAP	0.400		ND	mg/L	200	07/02/2025 18:29	241408
Surr: 1,2-Dichloroethane-d4	*	80-120		98.9	%REC	200	07/02/2025 18:29	241408
Surr: 4-Bromofluorobenzene	*	80-120		99.4	%REC	200	07/02/2025 18:29	241408
Surr: Dibromofluoromethane	*	80-120		98.8	%REC	200	07/02/2025 18:29	241408
Surr: Toluene-d8	*	80-120		101.7	%REC	200	07/02/2025 18:29	241408

Elevated reporting limit due to sample composition.



Laboratory Results

<http://www.teklabinc.com/>

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

Lab ID: 25062312-002

Client Sample ID: MET-S-20250626

Matrix: SOLID

Collection Date: 06/26/2025 14:20

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Batch
SW3550C_5035A_ASTM2974								
Percent Moisture	*	0.1		4.8	%	1	07/01/2025 13:36	R367513
SW-846 3546, 8082A, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD								
Aroclor 1016	NELAP	0.276		ND	mg/Kg-dry	1	07/02/2025 1:48	241273
Aroclor 1221	NELAP	0.276		ND	mg/Kg-dry	1	07/02/2025 1:48	241273
Aroclor 1232	NELAP	0.276		ND	mg/Kg-dry	1	07/02/2025 1:48	241273
Aroclor 1242	NELAP	0.276		ND	mg/Kg-dry	1	07/02/2025 1:48	241273
Aroclor 1248	NELAP	0.276		ND	mg/Kg-dry	1	07/02/2025 1:48	241273
Aroclor 1254	NELAP	0.276		ND	mg/Kg-dry	1	07/02/2025 1:48	241273
Aroclor 1260	NELAP	0.276		ND	mg/Kg-dry	1	07/02/2025 1:48	241273
Surr: Decachlorobiphenyl	*	12.6-130		86.1	%REC	1	07/02/2025 1:48	241273
Surr: Tetrachloro-meta-xylene	*	14-109		81.6	%REC	1	07/02/2025 1:48	241273
<i>Elevated reporting limit due to sample composition.</i>								



Quality Control Results

<http://www.teklabinc.com/>

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

STANDARD METHOD 4500-H B 2000, 2011, LABORATORY ANALYZED

Batch R367415		SampType: LCS		Units							
SampID: LCS											Date Analyzed
Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit		
Lab pH		1.00		6.99	7.000	0	99.9	99.29	100.7	06/30/2025	

Batch R367415		SampType: DUP		Units				RPD Limit 10			
SampID: 25062312-001CDUP											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Lab pH			1.00	H	10.2				10.21	0.00	06/30/2025

Batch R367415		SampType: DUP		Units				RPD Limit 10				Date Analyzed
SampID: 25062017-001ADUP												
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD		
Lab pH			1.00	H	7.94				7.930	0.13	06/30/2025	

Batch R367415		SampType: DUP		Units				RPD Limit 10			
SampID: 25062135-002ADUP											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Lab pH			1.00	H	7.57				7.580	0.13	06/30/2025

Batch R367415		SampType: DUP		Units				RPD Limit 10			
SampID: 25062206-002ADUP											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Lab pH			1.00	H	8.21				8.180	0.37	06/30/2025

Batch R367415		SampType: DUP		Units				RPD Limit 10			
SampID: 25062255-001ADUP											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Lab pH			1.00	H	7.31				7.330	0.27	06/30/2025

Batch R367415		SampType: DUP		Units				RPD Limit 10			
SampID: 25062255-002ADUP											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Lab pH			1.00	H	8.00				8.000	0.00	06/30/2025

Batch R367415		SampType: DUP		Units				RPD Limit 10			
SampID: 25062288-001ADUP											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Lab pH			1.00	H	8.68				8.640	0.46	06/30/2025



Quality Control Results

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Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

STANDARD METHOD 4500-H B 2000, 2011, LABORATORY ANALYZED

Batch R367415		SampType: DUP		Units				RPD Limit 10			Date Analyzed	
SampID: 25062349-001ADUP												
Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD			
Lab pH		1.00	H	7.00				7.020	0.29			
											06/30/2025	

Batch R367415		SampType: DUP		Units				RPD Limit 10			Date Analyzed	
SampID: 25062413-002ADUP												
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD		
Lab pH			1.00	H	6.01				6.010	0.00		

Batch R367415		SampType: DUP		Units				RPD Limit 10				Date Analyzed
SampID: 25062426-002ADUP												
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD		
Lab pH			1.00	H	7.99				7.980	0.13		
06/30/2025												

Batch R367415		SampType: DUP		Units				RPD Limit 10				Date Analyzed
SampID: 25062442-001ADUP												
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD		
Lab pH			1.00	H	1.75				1.750	0.00		

Batch R367415		SampType: DUP		Units				RPD Limit 10				Date Analyzed
SampID: 25062444-001CDUP												
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD		
Lab pH			1.00	H	8.97				8.960	0.11		
06/30/2025												

Batch R367415		SampType: DUP		Units				RPD Limit 10				Date Analyzed
SampID: 25062454-001BDUP												
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD		
Lab pH			1.00	H	8.10				8.090	0.12		
06/30/2025												



Quality Control Results

<http://www.teklabinc.com/>

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

SW3550C_5035A_ASTM2974

Batch R367513		SampType: LCS		Units %							
SampID: LCS											Date
Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit	Analyzed	
Percent Moisture	*	0.1		99.0	99.00	0	100.0	90	110	07/01/2025	
Percent Moisture	*	0.1		99.0	99.00	0	100.0	90	110	07/01/2025	
Percent Moisture	*	0.1		99.0	99.00	0	100.0	90	110	07/01/2025	
Percent Moisture	*	0.1		99.0	99.00	0	100.0	90	110	07/01/2025	
Percent Moisture	*	0.1		99.0	99.00	0	100.0	90	110	07/01/2025	
Percent Moisture	*	0.1		99.0	99.00	0	99.9	90	110	07/01/2025	
Percent Moisture	*	0.1		99.0	99.00	0	100.0	90	110	07/01/2025	

SW-846 1020B

Batch R367571		SampType: LCS		Units °F							
SampID: LCS											Date
Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit	Analyzed	
Ignitability, Closed Cup		60		83	81.00	0	102.5	97	103	07/02/2025	

Batch R367571		SampType: DUP		Units °F				RPD Limit 5			
SampID: 25062277-004ADUP											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Ignitability, Closed Cup			60		>200				0	0.00	07/02/2025

Batch R367571		SampType: DUP		Units °F				RPD Limit 5			
SampID: 25062405-001ADUP											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Ignitability, Closed Cup			60		>200				0	0.00	07/02/2025

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

SW-846 3510C, 8082A, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD
Batch 241187 **SampType:** MBLK Units mg/L

SampleID: MBLK-241187

Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit	Date Analyzed
Aroclor 1016		0.00100		ND						07/02/2025
Aroclor 1221		0.00100		ND						07/02/2025
Aroclor 1232		0.00100		ND						07/02/2025
Aroclor 1242		0.00100		ND						07/02/2025
Aroclor 1248		0.00100		ND						07/02/2025
Aroclor 1254		0.00100		ND						07/02/2025
Aroclor 1260		0.00100		ND						07/02/2025
Surr: Decachlorobiphenyl	*			0.29	0.2500		115.3	36.2	155	07/02/2025
Surr: Tetrachloro-meta-xylene	*			0.24	0.2500		97.7	34.6	138	07/02/2025

Batch 241187 **SampType:** LCSD Units mg/L

RPD Limit 36.4

SampleID: LCSDPCB-241187

Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Aroclor 1016		0.00100		0.00566	0.0050	0	113.2	0.00501	12.26	07/02/2025
Aroclor 1260		0.00100		0.00529	0.0050	0	105.8	0.00478	10.13	07/02/2025
Surr: Decachlorobiphenyl	*			0.31	0.2500		125.6			07/02/2025
Surr: Tetrachloro-meta-xylene	*			0.27	0.2500		107.6			07/02/2025

Batch 241187 **SampType:** LCS Units mg/L

SampleID: LCSPCB-241187

Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit	Date Analyzed
Aroclor 1016		0.00100		0.00501	0.0050	0	100.1	51.1	140	07/02/2025
Aroclor 1260		0.00100		0.00478	0.0050	0	95.6	40.7	142	07/02/2025
Surr: Decachlorobiphenyl	*			0.28	0.2500		112.0	36.2	155	07/02/2025
Surr: Tetrachloro-meta-xylene	*			0.24	0.2500		97.0	34.6	138	07/02/2025

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

SW-846 3546, 8082A, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD
Batch 241273 **SampType:** MBLK **Units** mg/Kg

SampleID: MBLK-241273

Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit	Date Analyzed
Aroclor 1016		0.0375		ND						07/01/2025
Aroclor 1221		0.0375		ND						07/01/2025
Aroclor 1232		0.0375		ND						07/01/2025
Aroclor 1242		0.0375		ND						07/01/2025
Aroclor 1248		0.0375		ND						07/01/2025
Aroclor 1254		0.0375		ND						07/01/2025
Aroclor 1260		0.0375		ND						07/01/2025
Surr: Decachlorobiphenyl	*			12.2	16.67		73.1	36.1	109	07/01/2025
Surr: Tetrachloro-meta-xylene	*			9.2	16.67		55.5	27.3	84.1	07/01/2025

Batch 241273 **SampType:** LCS **Units** mg/Kg

SampleID: LCSPCB-241273

Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit	Date Analyzed
Aroclor 1016		0.0375		0.215	0.333	0	64.5	40.7	88.4	07/01/2025
Aroclor 1260		0.0375		0.251	0.333	0	75.4	45.8	94.7	07/01/2025
Surr: Decachlorobiphenyl	*			14.8	16.67		88.9	36.1	109	07/01/2025
Surr: Tetrachloro-meta-xylene	*			9.8	16.67		58.6	27.3	84.1	07/01/2025

Batch 241273 **SampType:** MS **Units** mg/Kg-dry

SampleID: 25062263-002AMS

Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit	Date Analyzed
Aroclor 1016		0.0493		0.332	0.438	0	75.9	18.4	106	07/01/2025
Aroclor 1260		0.0493		0.294	0.438	0	67.1	19.4	106	07/01/2025
Surr: Decachlorobiphenyl	*			16.7	21.90		76.2	12.6	130	07/01/2025
Surr: Tetrachloro-meta-xylene	*			14.7	21.90		67.0	14	109	07/01/2025

Batch 241273 **SampType:** MSD **Units** mg/Kg-dry

RPD Limit 46.5

SampleID: 25062263-002AMSD

Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Aroclor 1016		0.0485		0.309	0.431	0	71.6	0.332	7.36	07/01/2025
Aroclor 1260		0.0485		0.293	0.431	0	68.0	0.294	0.15	07/01/2025
Surr: Decachlorobiphenyl	*			16.7	21.56		77.6			07/01/2025
Surr: Tetrachloro-meta-xylene	*			13.7	21.56		63.4			07/01/2025



Quality Control Results

<http://www.teklabinc.com/>

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

SW-846 1311, 5030B, 8260B, VOLATILE ORGANIC COMPOUNDS IN TCLP EXTRACT BY GC/MS

Batch 241408		SampType: MBLK		Units mg/L							
SampID: MBLK-AM250702A-1											
Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit	Date Analyzed	
1,1-Dichloroethene		0.0020		ND						07/02/2025	
1,2-Dichloroethane		0.0020		ND						07/02/2025	
1,4-Dichlorobenzene		0.0020		ND						07/02/2025	
2-Butanone		0.0100		ND						07/02/2025	
Benzene		0.0005		ND						07/02/2025	
Carbon tetrachloride		0.0020		ND						07/02/2025	
Chlorobenzene		0.0020		ND						07/02/2025	
Chloroform		0.0020		ND						07/02/2025	
Tetrachloroethene		0.0005		ND						07/02/2025	
Trichloroethene		0.0020		ND						07/02/2025	
Vinyl chloride		0.0020		ND						07/02/2025	
Surr: 1,2-Dichloroethane-d4	*			48.4	50.00		96.8	80	120	07/02/2025	
Surr: 4-Bromofluorobenzene	*			48.8	50.00		97.6	80	120	07/02/2025	
Surr: Dibromofluoromethane	*			49.4	50.00		98.8	80	120	07/02/2025	
Surr: Toluene-d8	*			50.5	50.00		101.1	80	120	07/02/2025	

Batch 241408		SampType:	LCS	Units mg/L							
SampID:		LCS-AM250702A-1									
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit	Date Analyzed
1,1-Dichloroethene			0.0020		0.0455	0.0500	0	91.1	79.9	119	07/02/2025
1,2-Dichloroethane			0.0020		0.0449	0.0500	0	89.7	73.8	119	07/02/2025
1,4-Dichlorobenzene			0.0020		0.0529	0.0500	0	105.8	85.7	116	07/02/2025
2-Butanone			0.0100		0.123	0.125	0	98.4	72.4	131	07/02/2025
Benzene			0.0005		0.0495	0.0500	0	99.0	86.3	117	07/02/2025
Carbon tetrachloride			0.0020		0.0524	0.0500	0	104.8	78.9	124	07/02/2025
Chlorobenzene			0.0020		0.0525	0.0500	0	104.9	85.9	116	07/02/2025
Chloroform			0.0020		0.0470	0.0500	0	94.0	84	116	07/02/2025
Tetrachloroethene			0.0005		0.0534	0.0500	0	106.7	84.1	123	07/02/2025
Trichloroethene			0.0020		0.0495	0.0500	0	99.1	86.2	117	07/02/2025
Vinyl chloride			0.0020		0.0480	0.0500	0	95.9	65.1	128	07/02/2025
Surr: 1,2-Dichloroethane-d4		*			48.1	50.00		96.2	80	120	07/02/2025
Surr: 4-Bromofluorobenzene		*			49.0	50.00		98.0	80	120	07/02/2025
Surr: Dibromofluoromethane		*			50.5	50.00		101.0	80	120	07/02/2025
Surr: Toluene-d8		*			50.4	50.00		100.8	80	120	07/02/2025



Quality Control Results

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Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

SW-846 1311, 5030B, 8260B, VOLATILE ORGANIC COMPOUNDS IN TCLP EXTRACT BY GC/MS

Batch	241408	SampType:	LCSD	Units mg/L				RPD Limit 20			
SampID: LCSD-AM250702A-1											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
1,1-Dichloroethene			0.0020		0.0464	0.0500	0	92.8	0.0455	1.89	07/02/2025
1,2-Dichloroethane			0.0020		0.0452	0.0500	0	90.5	0.0449	0.82	07/02/2025
1,4-Dichlorobenzene			0.0020		0.0528	0.0500	0	105.6	0.0529	0.19	07/02/2025
2-Butanone			0.0100		0.131	0.125	0	105.0	0.123	6.57	07/02/2025
Benzene			0.0005		0.0508	0.0500	0	101.5	0.0495	2.49	07/02/2025
Carbon tetrachloride			0.0020		0.0532	0.0500	0	106.4	0.0524	1.57	07/02/2025
Chlorobenzene			0.0020		0.0525	0.0500	0	105.1	0.0525	0.13	07/02/2025
Chloroform			0.0020		0.0474	0.0500	0	94.8	0.0470	0.85	07/02/2025
Tetrachloroethene			0.0005		0.0532	0.0500	0	106.4	0.0534	0.32	07/02/2025
Trichloroethene			0.0020		0.0507	0.0500	0	101.5	0.0495	2.39	07/02/2025
Vinyl chloride			0.0020		0.0491	0.0500	0	98.3	0.0480	2.43	07/02/2025
Surr: 1,2-Dichloroethane-d4		*			48.6	50.00		97.2			07/02/2025
Surr: 4-Bromofluorobenzene		*			48.7	50.00		97.4			07/02/2025
Surr: Dibromofluoromethane		*			50.6	50.00		101.2			07/02/2025
Surr: Toluene-d8		*			49.8	50.00		99.7			07/02/2025

Batch 241408		SampType:	LCSG		Units %REC						
SampID: LCSG-AM250702A-1											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit	Date Analyzed
Surr: 1,2-Dichloroethane-d4		*			47.8	50.00		95.5	80	120	07/02/2025
Surr: 4-Bromofluorobenzene		*			48.2	50.00		96.4	80	120	07/02/2025
Surr: Dibromofluoromethane		*			49.5	50.00		98.9	80	120	07/02/2025
Surr: Toluene-d8		*			50.9	50.00		101.7	80	120	07/02/2025

Batch	241408	SampType:	LCSGD	Units %REC							RPD Limit 0	
SampID: LCSGD-AM250702A-1												
Analyses			Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
Surr: 1,2-Dichloroethane-d4			*			49.6	50.00		99.1			07/02/2025
Surr: 4-Bromofluorobenzene			*			49.6	50.00		99.2			07/02/2025
Surr: Dibromofluoromethane			*			49.5	50.00		98.9			07/02/2025
Surr: Toluene-d8			*			51.7	50.00		103.4			07/02/2025



Quality Control Results

<http://www.teklabinc.com/>

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

SW-846 1311, 5030B, 8260B, VOLATILE ORGANIC COMPOUNDS IN TCLP EXTRACT BY GC/MS

Batch 241408		SampType: MS		Units mg/L							Date Analyzed
SampID: 25062312-001BMS											
Analyses	Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	Low Limit	High Limit		Date Analyzed
1,1-Dichloroethene		0.400		7.62	10.00	0	76.2	58.4	102		07/02/2025
1,2-Dichloroethane		0.400		9.03	10.00	0	90.3	73.2	128		07/02/2025
1,4-Dichlorobenzene		0.400		10.7	10.00	0	107.1	80.4	124		07/02/2025
2-Butanone		2.00		21.9	20.00	0	109.4	65.5	144		07/02/2025
Benzene		0.100		9.50	10.00	0	95.0	74.1	118		07/02/2025
Carbon tetrachloride		0.400		9.86	10.00	0	98.6	73.2	131		07/02/2025
Chlorobenzene		0.400		9.93	10.00	0	99.3	77.5	113		07/02/2025
Chloroform		0.400		9.15	10.00	0	91.5	78.9	122		07/02/2025
Tetrachloroethene		0.100		10.1	10.00	0	101.4	73.3	115		07/02/2025
Trichloroethene		0.400		9.15	10.00	0	91.5	75.6	114		07/02/2025
Vinyl chloride		0.400		9.02	10.00	0	90.2	41.7	136		07/02/2025
Surr: 1,2-Dichloroethane-d4	*			9.52	10.00		95.2	80	120		07/02/2025
Surr: 4-Bromofluorobenzene	*			9.76	10.00		97.6	80	120		07/02/2025
Surr: Dibromofluoromethane	*			9.90	10.00		99.0	80	120		07/02/2025
Surr: Toluene-d8	*			10.1	10.00		100.6	80	120		07/02/2025

Batch 241408		SampType: MSD		Units mg/L				RPD Limit 20			
SampID: 25062312-001BMSD											
Analyses		Cert	RL	Qual	Result	Spike	SPK Ref Val	%REC	RPD Ref Val	%RPD	Date Analyzed
1,1-Dichloroethene			0.400		6.99	10.00	0	69.9	7.618	8.54	07/02/2025
1,2-Dichloroethane			0.400		8.39	10.00	0	83.9	9.032	7.32	07/02/2025
1,4-Dichlorobenzene			0.400		10.1	10.00	0	100.9	10.71	5.96	07/02/2025
2-Butanone			2.00		19.6	20.00	0	97.8	21.88	11.17	07/02/2025
Benzene			0.100		8.91	10.00	0	89.1	9.504	6.45	07/02/2025
Carbon tetrachloride			0.400		9.28	10.00	0	92.8	9.858	6.02	07/02/2025
Chlorobenzene			0.400		9.34	10.00	0	93.4	9.926	6.04	07/02/2025
Chloroform			0.400		8.62	10.00	0	86.2	9.154	5.96	07/02/2025
Tetrachloroethene			0.100		9.55	10.00	0	95.5	10.14	5.95	07/02/2025
Trichloroethene			0.400		8.59	10.00	0	85.9	9.154	6.40	07/02/2025
Vinyl chloride			0.400		8.24	10.00	0	82.4	9.020	9.01	07/02/2025
Surr: 1,2-Dichloroethane-d4		*			9.23	10.00		92.3			07/02/2025
Surr: 4-Bromofluorobenzene		*			9.51	10.00		95.1			07/02/2025
Surr: Dibromofluoromethane		*			9.93	10.00		99.3			07/02/2025
Surr: Toluene-d8		*			10.0	10.00		100.2			07/02/2025



Receiving Check List

<http://www.teklabinc.com/>

Client: Environmental Works, Inc.

Work Order: 25062312

Client Project: 252049 MET Center

Report Date: 08-Jul-25

Carrier: Employee

Received By: EG

Completed by:

On:

26-Jun-25

Laura E Henson

Reviewed by:

On:

26-Jun-25

Ellie Hopkins

Pages to follow:

Chain of custody

1

Extra pages included

0

Shipping container/cooler in good condition?

Yes ☒

No ☐

Not Present ☐

Temp °C

7.1

Type of thermal preservation?

None ☐

Ice ☒

Blue Ice ☐

Dry Ice

☐

Chain of custody present?

Yes ☒

No ☐

Chain of custody signed when relinquished and received?

Yes ☒

No ☐

Chain of custody agrees with sample labels?

Yes ☒

No ☐

Samples in proper container/bottle?

Yes ☒

No ☐

Sample containers intact?

Yes ☒

No ☐

Sufficient sample volume for indicated test?

Yes ☒

No ☐

All samples received within holding time?

Yes ☐

No ☒

Reported field parameters measured:

Field ☐

Lab ☒

NA ☐

Sample analyses to be measured in the field and/or within 15 minutes of collection were analyzed in the lab as soon as practicable. These analyses include Chlorine (demand, free and/or residual), Carbon Dioxide, Dissolved Oxygen, Ferrous Iron, pH, and Sulfite.

Container/Temp Blank temperature in compliance?

Yes ☒

No ☐

When thermal preservation is required, samples are compliant with a temperature between 0.1°C - 6.0°C, or when samples are received on ice the same day as collected.

Water – at least one vial per sample has zero headspace?

Yes ☐

No ☐

No VOA vials ☒

Water - TOX containers have zero headspace?

Yes ☐

No ☐

No TOX containers ☒

Water - pH acceptable upon receipt?

Yes ☒

No ☐

NA ☐

NPDES/CWA TCN interferences checked/treated in the field?

Yes ☐

No ☐

NA ☒

Any No responses must be detailed below or on the COC.

☐ Downers Grove, IL ☐ Lenexa, KS
☐ Springfield, IL ☒ Collinsville, IL

pg. 1 of 1 Work order # 250.2312

TEKLAB, INC. 5445 Horseshoe Lake Road - Collinsville, IL 62234 - Phone: (618) 344-1004

Client: Environmental Works, Inc. Address: 108 Coulter Rd City / State / Zip: Dupro, IL Contact: Nicole Wise E-Mail: nwise@environmentalworks.com Phone: (816) 285-8410 Fax:	Samples on: ☒ ICE ☐ BLUE ICE ☐ NO ICE <u>7.1</u> °C LTG# <u>10</u> Preserved in: ☐ LAB ☐ FIELD <u>FOR LAB USE ONLY</u> Lab Notes Client Comments: _____ Report QC LVL: _____

Are these samples known to be involved in litigation? If yes, a surcharge will apply. ☐ Yes ☒ No

Are these samples known to be hazardous? If yes, include details of the hazard. ☐ Yes ☒ No

Are there any required reporting limits to be met on the requested analysis? If yes, please provide limits in the comment section. ☐ Yes ☒ No

Client Comments: Report QC LVL: _____
FIELD pH = 9-10 FOR "MET-L-20250626"

[illegible]

The individual signing this agreement on behalf of the client, acknowledges that he/she has read and understands the terms and conditions of this agreement, and that he/she has the authority to sign on behalf of the client. See www.teklabinc.com for terms and conditions.

BottleOrder: 101486



ENC 6/26/25

APPENDIX C

Laboratory Analytical Results and Chain of Custody

***NOTE:** LABORATORY REPORTS OMITTED FROM RFP DOCUMENT FOR BREVITY. AVAILABLE UPON REQUEST TO ALL BIDDERS.



Environmental Works, Inc.

HAZARDOUS MATERIALS SURVEY

**METROPOLITAN EDUCATION TRAINING CENTER
6347 PLYMOUTH AVENUE
WELLSTON, ST LOUIS COUNTY, MISSOURI**

Prepared For:

Land Clearance Redevelopment Authority
St. Louis, Missouri

Prepared By:

Environmental Works, Inc.
Kansas City, Missouri

EWI Project #252049, C1

November 14, 2025

Prepared By:

Ms. Nicole Wise
Senior Project Manager
Asbestos/Lead Inspector

Reviewed By:

Ms. Gracie Tiffany
Operations Manager
Assessment

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1.0 INTRODUCTION

Environmental Works, Inc. (EWI) performed a Hazardous Materials Survey on the Metropolitan Education Training (MET) Center located at 6347 Plymouth Avenue, Wellston, Missouri (Site). The Hazardous Materials Survey included an asbestos inspection and lead-based paint (LBP) survey. Mr. Andrew Barchak and Ms. Nicole Wise of EWI conducted the survey activities on September 22 and 23, 2025. The location of the Site is displayed on Figure 1.0.

1.1 Survey Objectives

The purpose of the survey was to determine the presence, location, condition, and quantity of asbestos containing materials (ACM) and LBP within the building, so that they can be managed properly during daily activities and future demolition/renovation activities. The asbestos inspection was conducted in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations. The LBP survey was conducted generally in accordance with the procedures specified in the Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing by a State of Missouri licensed Lead Inspector.

1.2 Building Description

The Site building was constructed in the early 1900's and consists of approximately 95,000 square feet (ft²). The building operates as the MET Center and is partially occupied by office and workforce training tenants. The building consists of a six-story office tower and a vaulted warehouse which is divided into "high bay" and "low bay". The northeast corner of the low bay is further classified as the "diesel shop". The building is brick and concrete block construction. The vaulted warehouse area mainly consists of concrete floors and exposed brick or concrete walls with limited areas of drywall. The ceilings consist of metal framing, wallboard and concrete panels. The high bay is covered with a pitched membrane-covered roof while the low bay is covered with a flat membrane-covered roof and a limited area in the southeast corner which is asphalt-covered.

The 1st, 2nd and 3rd floors of the office tower are comprised of concrete framing and flooring covered by carpet or floor tile. The 4th, 5th, and 6th floors of the office tower are comprised of metal framing with concrete slabs on top mostly covered by carpet or floor tile. Limited areas of exposed concrete floors are present. Wall systems throughout the office tower consist of drywall with limited areas of plaster walls and/or exposed brick. Acoustic drop ceiling tiles are located throughout the office and classroom areas, with concrete ceilings above on the 1st, 2nd, and 3rd floors, and metal ceilings above on the 4th, 5th and 6th floors. The office tower consists of a flat membrane-covered roof.

1.3 Previous Reports and Documentation

Prior to conducting the inspection, EWI requested documentation of previous inspections, sampling, or abatement activities conducted at the Site.

EWI reviewed a Limited Site-Specific Environmental Assessment conducted by Woodward-Clyde Consultants dated April 6, 1992 which included a brief suspect ACM inventory for the Site building. The Site building (Building 9) was identified with the following suspect ACMs: two areas of 11' x 19' floor tile, 17' x 9' floor tile, and 200 ft² of sprayed-on material on the 1st floor, and 120' x 80' floor and ceiling tile on the 4th, 5th and 6th floors. No asbestos sampling results were included in the report provided to EWI by the Client.

The Client provided a copy of an Air Monitoring Results report by M.J. Environmental Inc. for asbestos abatement conducted at the Site from October to November 1995. The report documents air monitoring results during removal of sprayed-on fireproofing, vinyl floor tile, and pipe insulation from the interior of the building, and removal of transite and galbestos from the exterior. No additional sampling or correspondence was available for review regarding asbestos or LBP at the Site.

2.0 ASBESTOS INSPECTION

The asbestos inspection was conducted in accordance with the NESHAP regulations and Missouri Department of Natural Resources (MoDNR) regulations for inspections. The inspection was completed by an Asbestos Hazard Emergency Response Act (AHERA) accredited State licensed inspector. Copies of the inspector's licenses are provided in Appendix A.

2.1 Purpose

The air toxics provisions of the Clean Air Act (CAA) require US EPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112 of the CAA, US EPA established the Asbestos NESHAP (40 CFR Part 61, Subpart M) to include specific compounds or hazardous air pollutants (HAP) that are known or suspected to cause cancer or other serious health effects. Asbestos was one of the first HAPs regulated under the air toxics program and were amended to cross-reference citations to US Occupational Safety and Health Administration (US OSHA), US Department of Transportation (US DOT) and US EPA requirements for disposal of asbestos waste.

NESHAP regulations require a thorough inspection where demolition or renovation operation will occur and the owner or operator of a commercial building to notify the regulatory authority before permanent removal (abatement) of certain thresholds and types of regulated asbestos-containing materials (RACM). The MoDNR is delegated authority by US EPA to regulate and enforce renovation and demolition projects involving RACM. The US EPA and MoDNR require a thorough inspection of all regulated structures that will be subject to renovation or demolition by a Missouri certified asbestos inspector to determine if any ACMs are present. St. Louis County Department of Public Health additionally regulates asbestos projects in St. Louis County, Missouri. Additionally, the US EPA requires building inspectors be accredited under the AHERA.

US EPA and MoDNR define ACM as any material containing more than 1% asbestos. Materials containing <1% asbestos do not meet the definition of ACM under US EPA NESHAP; however, are regulated by US OSHA.

ACMs are distinguished between friable or non-friable forms. Friable ACMs are materials that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. Non-friable ACMs can release fibers when damaged or disturbed, therefore EPA has defines two categories of non-friable ACM. RACM includes friable ACMs, Category I nonfriable ACM that has become friable, Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting or abrading, or Category II nonfriable ACM that has a high probability of becoming or has become crumbled,

pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

2.2 Inspection Activities

EWI conducted a visual survey of the Site prior to sampling to determine the presence, location, and condition of suspect ACMs. The suspect ACMs were grouped into homogeneous sampling areas, which are defined as an area of suspect materials that appear to be similar throughout in appearance, color, texture and material construction/application dates.

EWI inspected the accessible areas of the interior and exterior of the Site where suspect asbestos materials may be present. The inspection included common areas, utility spaces, mechanical rooms, attics, above ceilings, and throughout pipe chases, as access allowed and within the agreed upon scope of work for the project. Based on the nature of this inspection, EWI used destructive sampling methods to complete the inspection.

To avoid damaging the roof and the building integrity, EWI conducted limited sampling of the roofing parapet wall materials and did not sample sublayers of roofing materials. ACMs may be present in the subsurface layers of the roof. It is recommended that in the event of any future work to the roof is to be completed; a roofing contractor would need to be hired to repair coring activities from a full inspection of the roofing materials at the Site.

2.3 Sample Protocol

EWI collected bulk samples of homogenous suspect ACMs identified during the visual reconnaissance to confirm or deny the presence of asbestos and provide a comprehensive understanding of quantities, condition and locations of ACMs throughout the building. The number of samples collected for each homogenous material was dependent on the type of material, estimated quantity of the material and material locations, and inspector judgment.

Care was taken to prevent cross-contamination of collected samples. The bulk samples were placed into individual sample containers, and labeled with individual laboratory identification numbers. A unique sample identification number was assigned to each sample. The sample identification numbers, notes pertaining to the material description, condition, and sample location of the suspect materials were recorded on the field forms.

The samples were shipped via overnight carrier under proper chain-of-custody protocol and analyzed for asbestos by Environmental Microbiology Laboratory, Inc., Aerotech Laboratories, Inc., (EMLab P&K) of Phoenix, Arizona, a National Voluntary Laboratory Accreditation Program (NVLAP)-certified laboratory.

2.4 Laboratory Analytical Method

Bulk samples were analyzed using Polarized Light Microscopy (PLM) in conjunction with Dispersion Staining (DS) techniques, as outlined in USEPA Method, 600/R-93-116. The PLM Summary Report from the laboratory provides the type and percentage of asbestos (if any), as well as the type and percentage of other non-asbestos fibers. The PLM Summary Report is included in Appendix C.

2.5 Suspect Asbestos-Containing Materials

EWI identified 42 homogenous suspect materials and collected 93 samples for laboratory analysis. An Asbestos Sample Summary is provided as Table 1.0 and includes the complete list of suspect ACMs observed and sampled, sample ID numbers, material descriptions, sample locations, and analytical results. Sample Locations are provided on Figures 2.0 through 2.5.

2.6 Sample Results

Materials determined to contain greater than one percent ($>1\%$) of any type of asbestos fibers are considered an ACM by the US EPA. Materials containing less than one percent ($<1\%$) of asbestos fibers do not meet the definition of ACM under US EPA NESHAP; however, are regulated by US OSHA.

Based on the analytical results, 3 samples were identified with $>1\%$ asbestos. The following table provides a list of the samples containing asbestos or assumed to be ACM and the material locations, condition, and approximate quantities identified at the Site. Photographic documentation of the ACM identified at the Site during the inspection is included in Appendix B.

Sample Summary

Sample ID	Material	Sample Location	Analytical Results - Laboratory Description
25-1	Black Cove Base	6 th Level, Storage Room	8% Chrysotile-Black Cove Base
39-1	Parapet Wall Black Mastic	3 rd Level, Exterior Wall Roofing Mastic	12% Chrysotile-Black Mastic
39-2	Parapet Wall Black Mastic	3 rd Level, Exterior Wall Roofing Mastic	12% Chrysotile-Black Mastic
NS	Roofing Materials	All Roofing	Assumed

NS = Not Sampled (Assumed)

The following miscellaneous materials were determined to contain asbestos:

- Black mastic along the 3rd floor roof parapet wall was observed above the current roofing system. EWI believes the asbestos-containing wall mastic is associated with a former roofing system. The mastic was observed to be in damaged condition.
- Black cove base was observed along the 6th floor southwest storage room walls. This material was observed in damaged condition.

The following materials were not sampled and are assumed to be ACMs (per the NESHAP rule, suspect miscellaneous ACM must be assumed to be ACM, unless proven otherwise by appropriate bulk sampling and laboratory analyses):

- The building currently has a rubber membrane roof system, except for the southeast portion of the low bay. It is possible that ACMs may be present in these roofing materials or in the materials below the membrane. EWI did not conduct destructive sampling of roofing materials to avoid damage to the integrity of the structure; therefore, roofing materials are assumed to be asbestos containing.

3.0 LEAD-BASED PAINT SURVEY

The testing protocol utilized during this inspection focused on a surface investigation for the presence of LBP. The survey was conducted in general accordance with the HUD Guidelines for the Evaluation and Control of Lead-Based Paint in Housing (June 1995), updated Chapter 7 (July 2012). Accessible interior and exterior surfaces of the building (ceilings, walls, doors, door frames, windows framing, trim, and accessories [pipe hangers, air duct grates, etc.]) were tested for the presence of LBP.

3.1 Inspected Areas

The exposed accessible painted surfaces throughout the buildings of the Site were inspected for LBP. The LBP Survey Record Sheet provided as Table 2.0 details the field data including colors, locations, substrates, conditions, rooms and X-ray fluorescence (XRF) results obtained during this LBP survey.

3.2 Sample Collection Procedures/Methodology

The Site was surveyed to determine the presence, location, condition, and lead content of the painted/stained and or metal surfaces. The inspection utilized an XRF analyzer (NITON – XLp702A, Serial #106544). The performance of the XRF analyzer was checked against a standard, pursuant to the manufacturer's specifications, by analyzing pre-determined lead paint sample chips produced by the National Institute of Standards and Testing (NIST). These quality control measures produce a 95% confidence level that XRF readings accurately reflect the actual level of lead in the tested surfaces. The XRF was checked against the standardized paint chips every time it was turned on, every four (4) hours thereafter and prior to shutting the device off. A copy of the XRF Performance Characteristic Sheet and the User's Certification are included in Appendix D.

Each side of the building is assigned a letter (Side 'A', Side 'B', Side 'C', and Side 'D'). The side of the building where the front entrance is located is designated Side 'A'. The three remaining sides of the building are labeled clockwise as follows: standing inside the building, with back to the front entrance (the 'A' side), the side on the left is 'B', the rear side is 'C', and the side to the right is 'D'. For exterior surfaces, when facing the front entrance of the building, the front entrance side is 'A', and, proceeding clockwise, the left side is 'B', the rear side is 'C', and the right side is 'D'.

Within the building, the sides of each room are assigned letters in the same way as the interior as a whole. That is, when standing in any interior room, with the front entrance of the building behind where one is standing, the side which is parallel to the front entrance is designated side 'A', and, again proceeding clockwise, the side on the left is 'B', the side facing (parallel to the rear side of the building) is 'C', and the right side is 'D'. A description of XRF field data is included in Appendix E.

Test locations were selected based on observed painted/stained surfaces at the Site and accessibility for the XRF unit. By conducting a random sampling of the buildings and statistically analyzing the results of the XRF data, the existence and location of LBP at the Subject Site is identified.

3.3 XRF Results

According to the US EPA and HUD, positive detections of LBP is defined as XRF measurements greater than or equal to 1.0 milligrams per square centimeter (mg/cm²). Table 2.0 LBP Survey Record Sheet provides a complete list of XRF results and description of the testing combinations. A description of XRF field data including paint condition, building description, and room designation are provided in Appendix E.

The following XRF readings were greater than 1.0 mg/cm² and determined to be lead-based:

Reading Number	Building/ Floor	Material/Location	Paint color	Condition	XRF Result (lead in mg/cm ²)
7, 46, 47, 49	Diesel Shop & Low Bay	Eastern Brick Wall	White	Intact	1.27 – 5.18
10, 11, 25, 26, 40, 84, 92	Diesel Shop & High Bay	Metal Vertical Beams	White	Intact	1.19 – 3.92
43, 71	Low Bay	Metal Vertical Beams	Grey	Intact	1.04 - 4.04
59	Low Bay	Stair Rail	Grey	Intact	2.14
66, 67	Low Bay	Concrete Pillars	Green/White	Peeling	1.33 – 2.23
79, 80, 81	High Bay	Brick Wall and Concrete Trim (Northwest Corner)	Yellow	Intact	1.24 – 5.37
88, 221	High Bay	Bottom of Concrete Columns	Yellow	Intact	1.00 - 1.01
116	6 th Floor Office	Cross Beam	Red	Intact	1.28
123, 203	2 nd and 6 th Floor Office Stairwell	Stair Rail	Blue	Intact	1.01 - 1.07
147	5 th Floor Office	Concrete Pillar	White	Intact	1.31
158, 179, 208	1 st , 2 nd , 3 rd Floor Office	Concrete Pillar	Orange/White	Intact	1.2 - 2.75
161, 162	3 rd Floor Office Stairwell	Brick Wall and Concrete Trim	White	Intact	1.53 – 1.57
174	High Bay	Horizontal Metal Beam	White	Intact	7.01
191, 192, 198	2 nd Floor Office	Concrete Columns	White	Intact	1.53 – 1.65

4.0 CONCLUSIONS AND RECOMMENDATIONS

On September 22 and 23, 2025, Andrew Barchak and Nicole Wise performed a Hazardous Materials Survey including an asbestos inspection and LBP survey on the MET Center building located at 6347 Plymouth Avenue, Wellston, Missouri.

4.1 Asbestos Inspection

The following table summarizes the homogeneous materials confirmed or assumed to be a RACM, and the locations, conditions, and the approximate quantities:

Material	Material locations	Friable	Condition ¹	Approximate Quantity (feet) ²
Cove Base	6 th Floor southwest storage room	No	Damaged	60 ln ft
Exterior Black Wall Mastic	3 rd Floor roof parapet walls	No	Damaged	750 ln ft
Roofing Materials	All Roofing Systems	No	Good	~ 50,000 sq ft

¹ Condition: Based on EWI's visual assessment, good=no damage/very limited damage, Damaged=less than 10% localized or distributed damage, Significantly damaged=more than 10% damaged.

² Note: Approximate quantities were determined based on visual estimates made during the inspection and are subject to any limitations of this inspection or approved scope of work. It is possible that ACMs may be concealed in areas inaccessible to EWI during this inspection.

- Cove base, exterior wall mastic and asphaltic roofing materials are considered NESHAP Category I Non-Friable ACM. Category I Non-Friable ACM includes non-friable materials that will be or have been subject to sanding, grinding, cutting, or abrading.

4.2 Lead-Based Paint Survey

According to the US EPA and HUD, LBP is defined as XRF measurements greater than or equal to 1.0 mg/cm². Based on the XRF results, LBP was identified in the following locations:

- Diesel Shop – Eastern brick wall and vertical beams. The LBP was observed in good condition in residual quantities beneath existing paint.
- Low Bay – Eastern brick wall, stair rail to mezzanine and vertical beams. The LBP on these components was observed in good condition in residual quantities beneath existing paint. Concrete columns along the south wall adjoining the office tower were also identified with

LBP. The paint was observed to be peeling and exposed or in residual quantities beneath existing paint.

- High Bay – Northwestern brick wall and concrete trim, vertical beams and the bottom half of concrete columns (yellow-painted) along the western wall. The LBP on these components was observed in good condition in residual quantities beneath existing paint. A horizontal beam which was accessed from the 3rd floor mezzanine was also identified with LBP. The paint was observed to be in good condition.
- Office Tower – Red metal cross beams above drop ceilings on 4th, 5th and 6th floors, and concrete pillars and columns throughout the 1st, 2nd, 3rd, 4th and 5th floors. The LBP on pillars and columns was observed in good condition in residual quantities beneath existing paint.
- Office Tower Stairwell – Stair rails, brick walls and concrete trim below windows. The LBP on these components was observed in good condition in residual quantities beneath existing paint.

5.0 LIMITATIONS

5.1 ACM Survey Limitations

This assessment was conducted by an AHERA-Certified Asbestos Inspector. The conclusions presented in this report are based solely upon the reported analytical results from an independent laboratory.

To avoid damaging the roof and the building integrity, EWI conducted limited sampling of the roofing parapet wall materials and did not sample sublayers of roofing materials.

5.2 LBP Survey Limitations

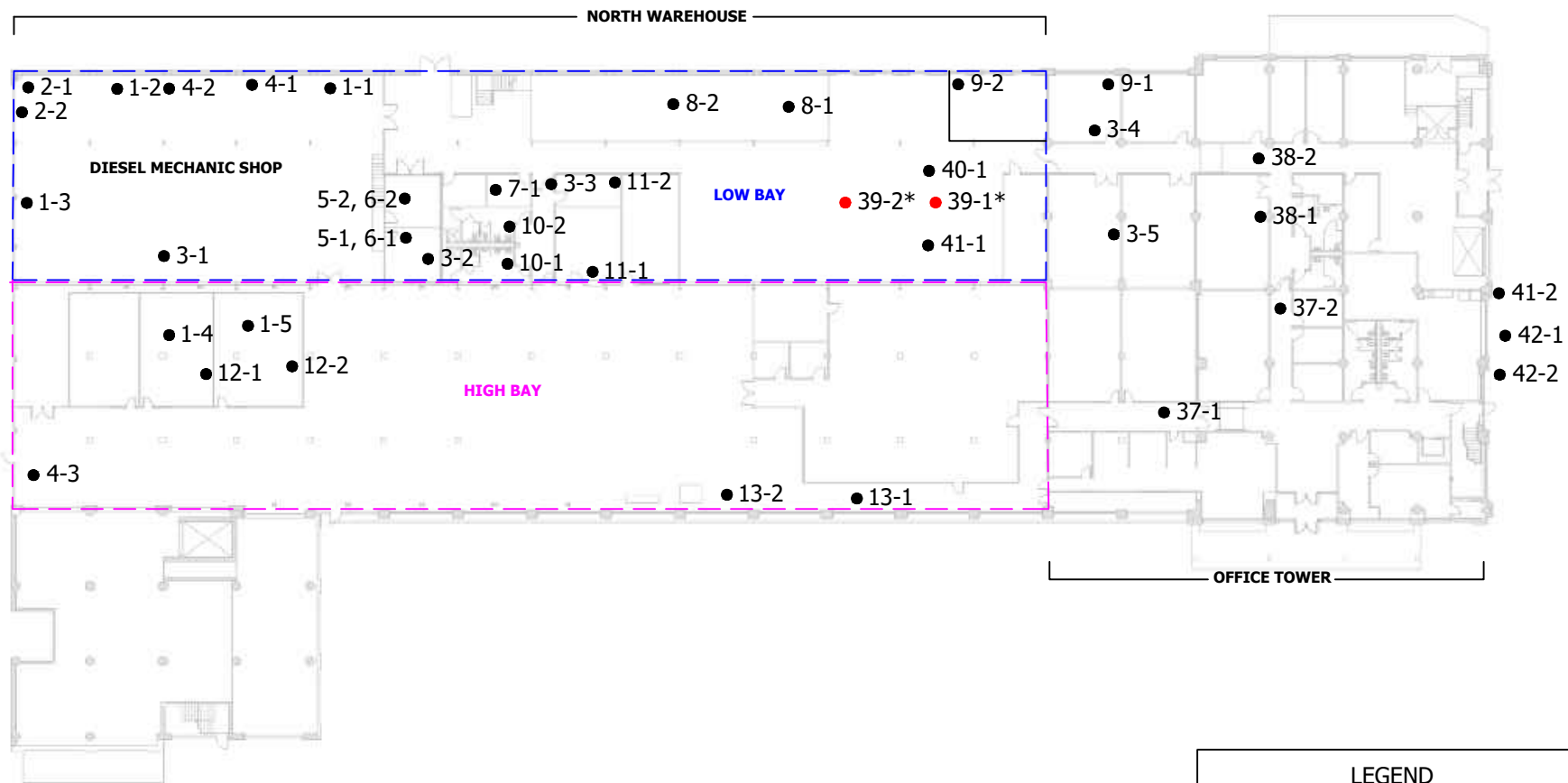
This assessment was conducted by a Lead Inspector licensed in the state of Missouri. The conclusions presented in this report are based solely upon the reported analytical results from the XRF readings for LBP.

This report was prepared based on interpretation of information obtained during the survey of the Site. The conclusions of this report are professional opinions based solely upon those visual site observations, information supplied by the client during the time of the Survey and interpretations of sample findings as described in our report. Locations where sampling was performed were described as approximate locations. The data collected during the limited inspection and short term sample collection only allows us to determine if the results correspond to the characteristics of a building at the time of the survey. Our opinions and recommendations are intended exclusively for client use. Additionally, the opinions presented herein apply to the Site conditions existing at the time of our inspection. Therefore, our opinions may not apply to future conditions that may develop at the Site, which we have not had the opportunity to evaluate.

This assessment was performed at the request of Land Clearance Redevelopment Authority utilizing methods and procedures consistent with good commercial or customary practices designed to conform with acceptable industry standards and is not for use of other parties without the expressed written authorization of EWI. The independent conclusions represent Environmental Works, Inc.'s best professional judgment based on the conditions that existed and the information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided to Reliant Parties, or their representative has been assumed to be correct and complete.



CHECKED BY: N. WISE	SCALE IN FEET 0 100 200  APPROXIMATE	 ENVIRONMENTAL WORKS 1455 E. Chestnut Expressway, Springfield, MO 65802	SITE LOCATION MAP	FIGURE 1.0
E.W.I. # 252049 DRAWN BY: HMC Ver. 1: 6/27/25			MET CENTER 6347 PLYMOUTH AVENUE WELLSTON, ST. LOUIS COUNTY, MO	



LEGEND
● = NEGATIVE ASBESTOS SAMPLE
● = POSITIVE ASBESTOS SAMPLE
* = COLLECTED FROM ROOF

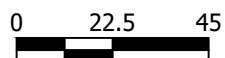
NORTH



CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HC
OCT. 14, 2025

SCALE IN FEET



APPROXIMATE



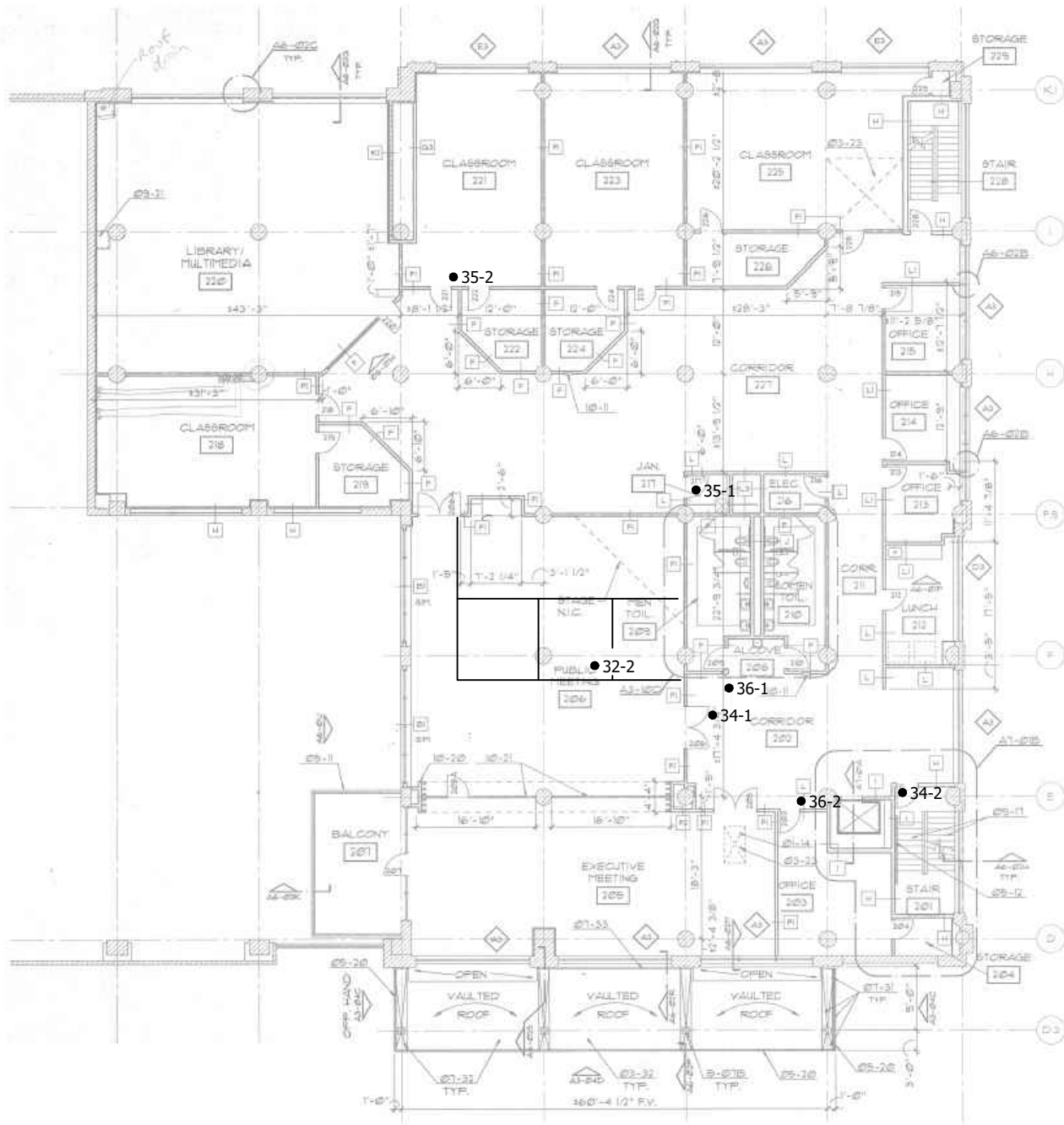
Kansas City Office Location:
1731 Locust Street
Kansas City, MO 64108
Phone: (816) 285-8410

ASBESTOS SAMPLE LOCATIONS

MET CENTER - 1ST FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

2.0



NORTH



LEGEND

● = NEGATIVE ASBESTOS SAMPLE

CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HC
OCT. 14, 2025

SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

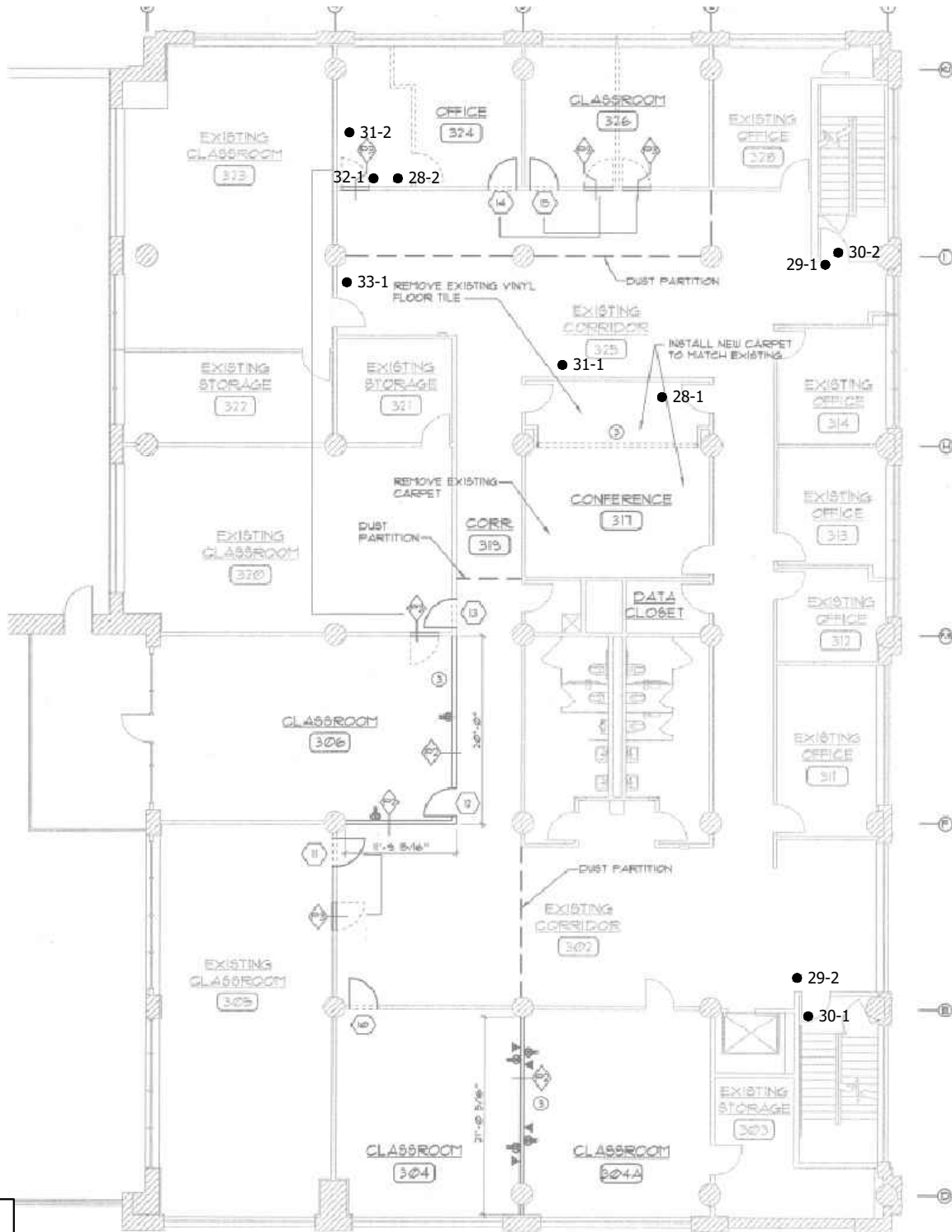
1455 E. Chestnut Expressway, Springfield, MO 65802

ASBESTOS SAMPLE LOCATIONS

MET CENTER - 2ND FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

2.1



NORTH



LEGEND

● = NEGATIVE ASBESTOS SAMPLE

CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HC
OCT. 14, 2025

SCALE IN FEET

0 17.5 15



APPROXIMATE



ENVIRONMENTAL WORKS

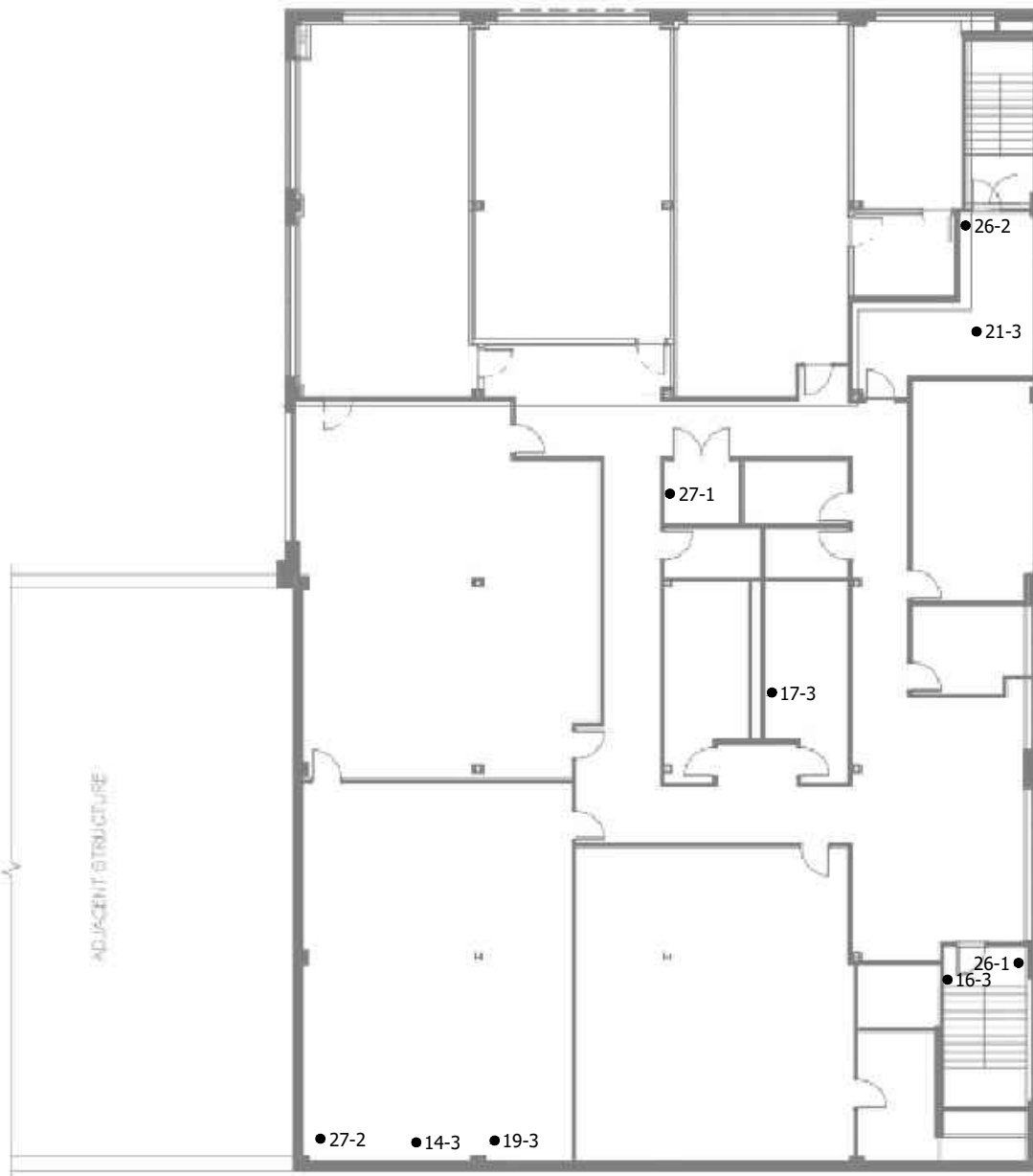
1455 E. Chestnut Expressway, Springfield, MO 65802

ASBESTOS SAMPLE LOCATIONS

MET CENTER - 3RD FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

2.2



NORTH



LEGEND

● = NEGATIVE ASBESTOS SAMPLE

CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HC
OCT. 15, 2025

SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

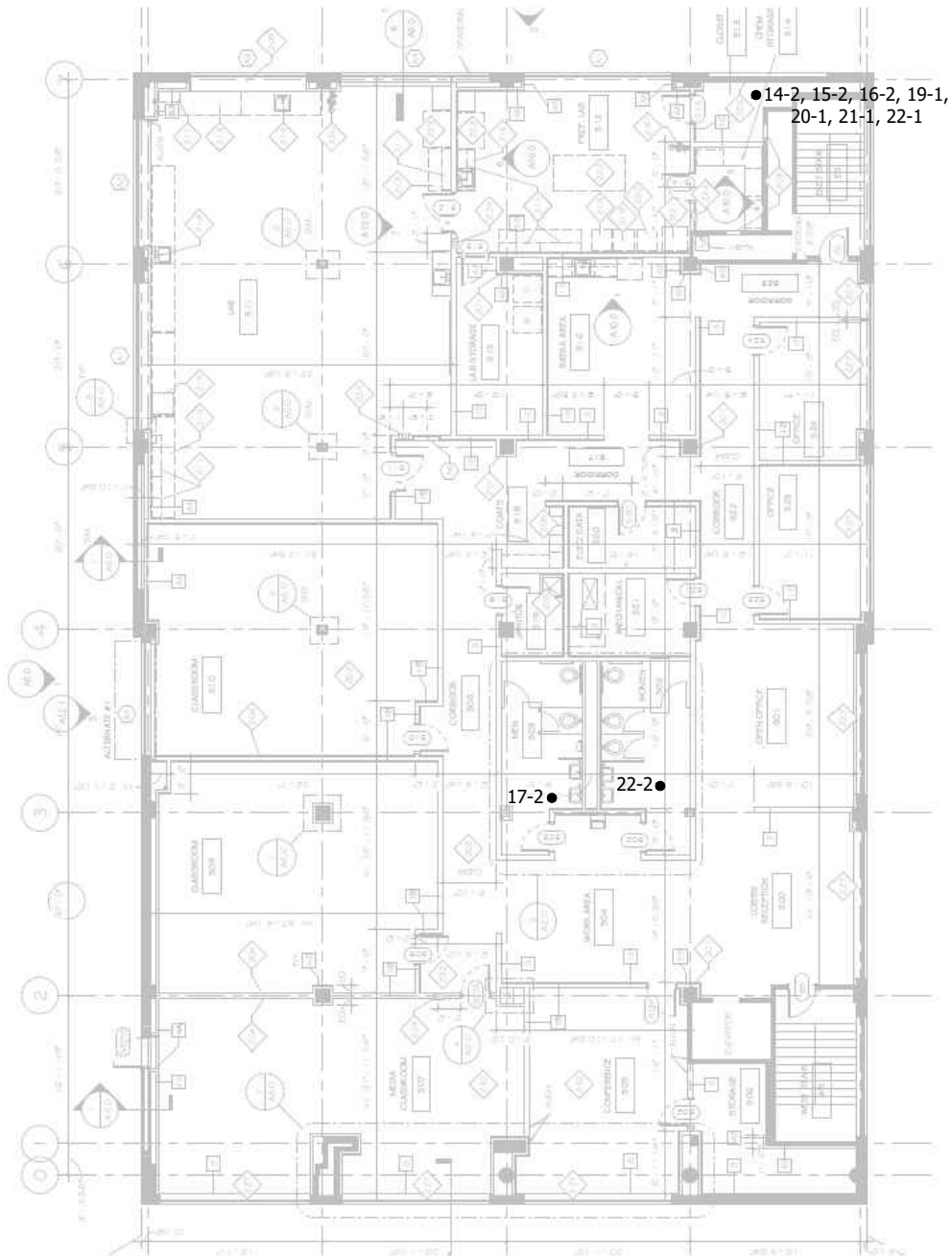
1455 E. Chestnut Expressway, Springfield, MO 65802

ASBESTOS SAMPLE LOCATIONS

MET CENTER - 4TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

2.3



NORTH



LEGEND

● = NEGATIVE ASBESTOS SAMPLE

CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HC
OCT. 15, 2025

SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

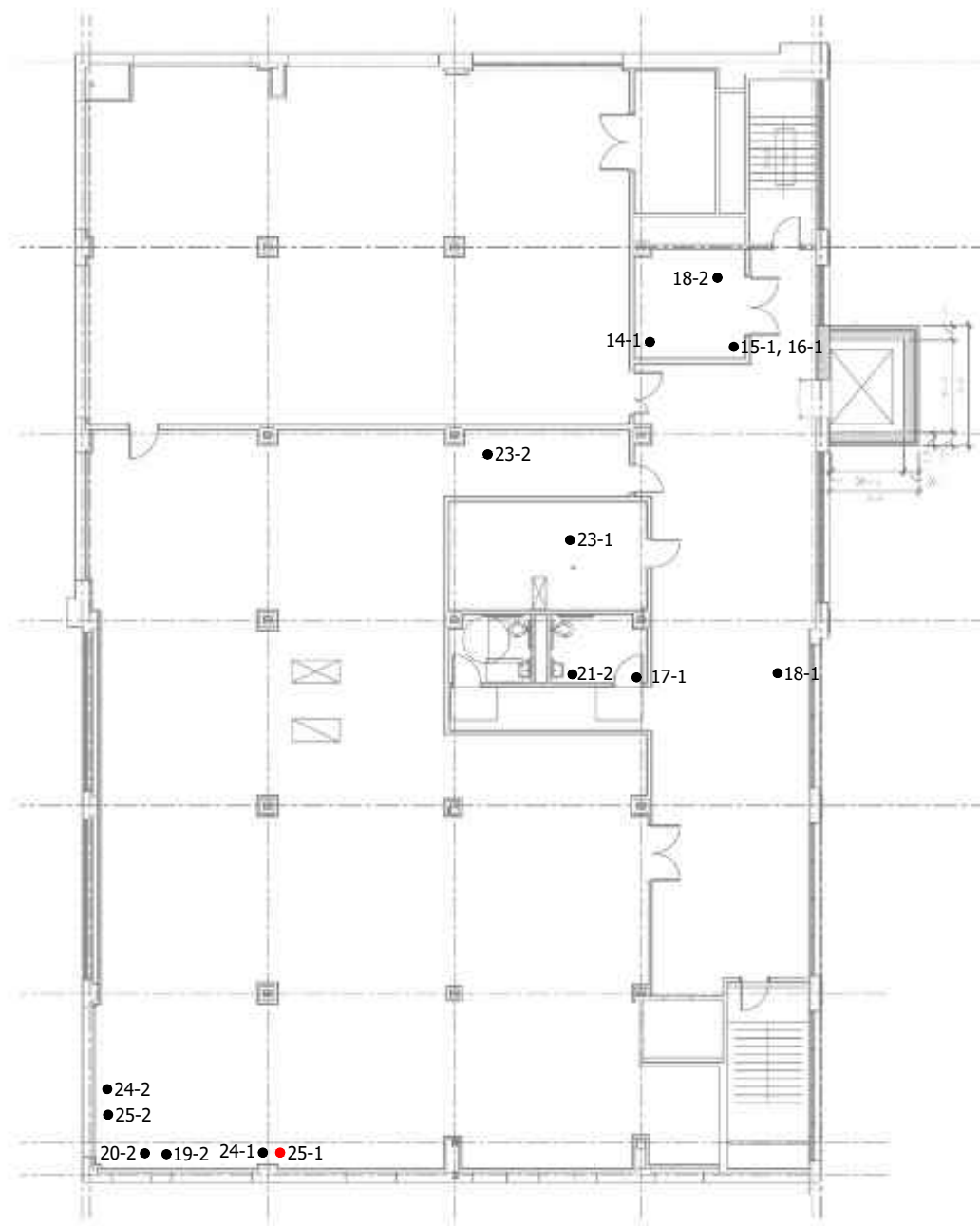
1455 E. Chestnut Expressway, Springfield, MO 65802

ASBESTOS SAMPLE LOCATIONS

MET CENTER - 5TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

2.4



NORTH



LEGEND

- = NEGATIVE ASBESTOS SAMPLE
- = POSITIVE ASBESTOS SAMPLE

CHECKED BY:
N. WISE

E.W.I. # 252049
DRAWN BY: HC
OCT. 15, 2025

SCALE IN FEET

0 10 20

APPROXIMATE



ENVIRONMENTAL WORKS

1455 E. Chestnut Expressway, Springfield, MO 65802

ASBESTOS SAMPLE LOCATIONS

MET CENTER - 6TH FLOOR
6347 PLYMOUTH AVENUE
WELLSTON, ST. LOUIS COUNTY, MO

FIGURE

2.5

Table 1.0 Asbestos Sample Summary

Hazardous Materials Survey MET Center 6347 Plymouth Avenue Wellston, Missouri

Sample determined to contain >1% asbestos
Sample determined to contain <1% asbestos
 ND = Non Detect, asbestos was not identified

Sample ID	Material	Sample Location	Analytical Results - Laboratory Description
1-1	Fireproofing (1)	Diesel Shop - East Wall	ND - Yellow Foam ND - White Non-Fibrous Material ND - White Fibrous Material
1-2	Fireproofing (1)	Diesel Shop - East Wall	ND - Yellow Foam ND - White Fibrous Material
1-3	Fireproofing (1)	Diesel Shop - North Wall	ND - Yellow Foam ND - White Fibrous Material
1-4	Fireproofing (1)	High Bay Classrooms	ND - White Fibrous Material
1-5	Fireproofing (1)	High Bay Classrooms	ND - White Fibrous Material
2-1	Duct Mastic	Diesel Bay - East Wall	ND - Gray Mastic ND - Gray Mastic 2
2-2	Duct Mastic	Diesel Shop - North Wall	ND - Gray Mastic
3-1	Drywall Composite (Tape/Joint/Drywall) - White (1)	Diesel Shop - West Wall	ND - White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape ND - White Compound with Paint
3-2	Drywall Composite (Tape/Joint/Drywall) - White (1)	Diesel Shop - South Wall	ND - White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape ND - White Compound with Paint
3-3	Drywall Composite (Tape/Joint/Drywall) - White (1)	Low Bay - Entry Wall	ND - White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape ND - White Compound with Paint
3-4	Drywall Composite (Tape/Joint/Drywall) - White (1)	Low Bay - Office Wall	ND - White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape ND - White Compound with Paint
3-5	Drywall Composite (Tape/Joint/Drywall) - White (1)	Low Bay - Storage Wall	ND - White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape
4-1	Expansion Joint	Diesel Shop - East Wall	ND - Brown Fibrous Material
4-2	Expansion Joint	Diesel Shop - East Wall	ND - Yellow Foam ND - Brown Fibrous Material
4-3	Expansion Joint	High Bay - NW Corner Wall	ND - Brown Fibrous Material ND - Grey Non-Fibrous Material with Paint
5-1	Floor Tile + Mastic (Diesel Offices)	Diesel Shop - Mezz Office	ND - Brown Wood ND - Yellow Mastic ND - White Floor Tile
5-2	Floor Tile + Mastic (Diesel Offices)	Diesel Shop - Mezz Office	ND - Brown Wood ND - Yellow Mastic ND - White Floor Tile
6-1	ACT (Diesel Offices)	Diesel Shop - Mezz Office	ND - Yellow Insulation ND - Beige Ceiling Tile with White Surface
6-2	ACT (Diesel Offices)	Diesel Shop - Mezz Office	ND - Yellow Insulation ND - Beige Ceiling Tile with White Surface
7-1	Yellow Wall Mastic	Low Bay - Utility Closet	ND - White Drywall with Brown Paper ND - Yellow Mastic

Table 1.0 **Asbestos Sample Summary**

Hazardous Materials Survey **MET Center** **6347 Plymouth Avenue** **Wellston, Missouri**

Sample determined to contain >1% asbestos
Sample determined to contain <1% asbestos
 ND = Non Detect, asbestos was not identified

Sample ID	Material	Sample Location	Analytical Results - Laboratory Description
8-1	Ceiling Drywall (Lower Bay)	Low Bay - Ceiling	ND - White Drywall with Brown Paper ND - Silver Non-Fibrous Material with Paint
8-2	Ceiling Drywall (Lower Bay)	Low Bay - Ceiling	ND - White Drywall with Brown Paper ND - Silver Non-Fibrous Material with Paint
9-1	Cove Base + Mastic (Lower Bay)	Low Bay - Offices	ND - Yellow Mastic ND - Gray Cove Base
9-2	Cove Base + Mastic (Lower Bay)	Low Bay - Offices	ND - Yellow Mastic ND - Gray Cove Base
10-1	Grout (high bay bath)	Low Bay - Mens Bath	ND - White Grout
10-2	Grout (high bay bath)	Low Bay - Womens Bath	ND - White Compound ND - Gray Grout
11-1	Light Brown Floor Tile + Mastic	Low Bay - Hallway Bath	ND - Black Mastic ND - Yellow Mastic ND - Tan Floor Tile
11-2	Light Brown Floor Tile + Mastic	Low Bay - Class 157	ND - White Compound ND - Yellow Mastic ND - Tan Floor Tile
12-1	Wall Sheeting + Mastic	High Bay Classrooms	ND - Tan Mastic ND - White Non-Fibrous Material ND - White Caulk
12-2	Wall Sheeting + Mastic	High Bay Classrooms	ND - Tan Mastic ND - White Non-Fibrous Material ND - White Caulk
13-1	Window Caulk	High Bay - West Wall	ND - Gray Caulk with Paint
13-2	Window Caulk	High Bay - West Wall	ND - Gray Caulk with Paint
14-1	Fireproofing (2)	6th Level - Storage Ceiling	ND - Gray Fireproofing
14-2	Fireproofing (2)	5th Level - Lab Storage Ceiling	ND - Gray Fireproofing
14-3	Fireproofing (2)	4th Level - SW Storage Ceiling	ND - Beige Fireproofing
15-1	White Floor Tile + Yellow Mastic	6th Level - Storage Closet	ND - White Cementitious Material ND - Yellow Mastic ND - White Floor Tile
15-2	White Floor Tile + Yellow Mastic	5th Level - Lab Closet	ND - White Cementitious Material ND - Yellow Mastic ND - White Floor Tile
15-3	White Floor Tile + Yellow Mastic	4th Level - Edge of Stairs	ND - Yellow Mastic ND - White Floor Tile
16-1	Grey Cove Base + Mastic	6th Level - Storage Closet	ND - Yellow Mastic ND - Gray Cove Base
16-2	Grey Cove Base + Mastic	5th Level - Lab Closet	ND - White Fibrous Material with Paint ND - Yellow Mastic ND - Gray Cove Base
16-3	Grey Cove Base + Mastic	4th Level - Edge of Stairs	ND - Yellow Mastic ND - Gray Cove Base
17-1	Bathroom Grout	6th Level - Bath	ND - Gray Grout
17-2	Bathroom Grout	5th Level - Bath	ND - Gray Grout
17-3	Bathroom Grout	4th Level - Bath	ND - Gray/White Grout ND - Gray Ceramic Tile
18-1	ACT (2) (6th Offices)	6th Level - Open Area	ND - Gray Ceiling Tile with White Surface

Table 1.0 **Asbestos Sample Summary**

Hazardous Materials Survey **MET Center** **6347 Plymouth Avenue** **Wellston, Missouri**

Sample determined to contain >1% asbestos

Sample determined to contain <1% asbestos

ND = Non Detect, asbestos was not identified

Sample ID	Material	Sample Location	Analytical Results - Laboratory Description
18-2	ACT (2) (6th Offices)	6th Level - Storage Closet	ND - Gray Ceiling Tile with White Surface
19-1	Plaster + Skim Coat (top 3 levels)	5th Level - Lab Closet	ND - Tan Plaster ND - Beige Plaster ND - White Skim Coat with Paint
19-2	Plaster + Skim Coat (top 3 levels)	6th Level - Storage	ND - Beige Plaster ND - White Skim Coat with Paint
19-3	Plaster + Skim Coat (top 3 levels)	4th Level - SW Storage	ND - Tan Plaster ND - Beige Plaster ND - White Skim Coat with Paint
20-1	Black Wall Coating	5th Level - Lab Closet	ND - Off-White Cementitious Material ND - Black Coating
20-2	Black Wall Coating	6th Level - Storage	ND - Off-White Cementitious Material ND - Black Coating
21-1	Drywall Composite (Tape/Joint/Drywall) - White (2)	5th Level - Lab Closet	ND - White Drywall with Brown Paper ND - White Compound with Paint
21-2	Drywall Composite (Tape/Joint/Drywall) - White (2)	6th Level - Storage Closet	ND - White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape ND - White compound with Paint
21-3	Drywall Composite (Tape/Joint/Drywall) - White (2)	4th Level - Stairs Foyer	ND - White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape ND - White Compound with Paint
22-1	ACT (3) (4/5 Offices)	5th Level - Lab Closet	ND - Beige Ceiling Tile with White Surface
22-2	ACT (3) (4/5 Offices)	5th Level - Bath	ND - Beige Ceiling Tile with White Surface
23-1	Drywall Composite (Tape/Joint/Drywall) - (Pink)	6th Level - Electrical Room	ND - Off-White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape ND - White Compound with Paint
23-2	Drywall Composite (Tape/Joint/Drywall) - (Pink)	6th Level - Storage	ND - White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape ND - White compound with Paint
24-1	Red Brick + Black Coating	6th Level - Storage	ND - Red Brick ND - Black Coating
24-2	Red Brick + Black Coating	6th Level - Storage	ND - Red Brick ND - Black Coating
25-1	Black Cove Base + Mastic (6th)	6th Level - Storage	Yellow Mastic 8% Chrysotile - Black Cove Base ND - White Semi-Fibrous Material
26-1	Grey Flooring (6th Stairs)	4th Level - Stairs Entry	ND - Gray Flooring
26-2	Grey Flooring (6th Stairs)	4th Level - Stairs Foyer	ND - Gray Non-Fibrous Material ND - Yellow Mastic ND - Gray Flooring
27-1	Beige Floor Tile + Mastic	4th Level - Closet	ND - Yellow Mastic ND - Beige Floor Tile ND - Yellow Mastic 2

Table 1.0 Asbestos Sample Summary

Hazardous Materials Survey MET Center 6347 Plymouth Avenue Wellston, Missouri

Sample determined to contain >1% asbestos
Sample determined to contain <1% asbestos
 ND = Non Detect, asbestos was not identified

Sample ID	Material	Sample Location	Analytical Results - Laboratory Description
27-2	Beige Floor Tile + Mastic	4th Level - NW Room	ND - Yellow Mastic ND - Beige Floor Tile ND - Yellow Mastic 2
28-1	Grey Splotch Floor Tile + Black Mastic (3rd)	3rd Level - Copy Room	ND - Gray Floor Tile ND - Black mastic
28-2	Grey Splotch Floor Tile + Black Mastic (3rd)	3rd Level - NE Office	ND - Gray Floor Tile ND - Black mastic
29-1	Brown Floor Tile + Yellow Mastic (3rd)	3rd Level - Stairs Entry	ND - Multicolored Debris ND - White Leveling Compound ND - Gray Non-Fibrous Material ND - Yellow Mastic ND - Brown Floor Tile
29-2	Brown Floor Tile + Yellow Mastic (3rd)	3rd Level - Stairs Entry	ND - Multicolored Debris ND - Transparent Non-Fibrous Material ND - Brown Floor Tile
30-1	Grey Stair Tiles + Mastic (3rd)	3rd Level - Stairs Entry	ND - Brown Debris ND - Yellow Mastic ND - Gray Stair Tread
30-2	Grey Stair Tiles + Mastic (3rd)	3rd Level - Stairs Entry	ND - Brown Debris ND - Yellow Mastic ND - Gray Stair Tread
31-1	ACT (4) (3rd Offices)	3rd Level - East Common Area	ND - Beige Ceiling Tile with White Surface
31-2	ACT (4) (3rd Offices)	3rd Level - NE Office	ND - Beige Ceiling Tile with White Surface
32-1	Drywall Composite (Tape/Joint/Drywall) - White (3)	3rd Level - NE Office	ND - White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape ND - White Compound with Paint
32-2	Drywall Composite (Tape/Joint/Drywall) - White (3)	2nd Level - SW Offices	ND - White Drywall with Brown Paper ND - White Joint Compound ND - Beige Tape ND - White compound with Paint
33-1	White Cove Base + Mastic	3rd Level - East Common Area	ND - White Cove Base ND - Yellow Mastic
34-1	Yellow Checkered Floor Tile + Mastic	2nd Level - SW Offices Entry	ND - Gray Debris ND - Yellow Mastic ND - Tan Floor Tile ND - Yellow Mastic 2
34-2	Yellow Checkered Floor Tile + Mastic	2nd Level - SW Stairs	ND - Gray Debris ND - Yellow mastic ND - Tan Floor Tile ND - Yellow Mastic 2
35-1	Grey Splotch Floor Tile + Black Mastic (2nd)	2nd Level - NE Mop Sink Room	ND - Black Mastic ND - Yellow Mastic ND - Gray Floor Tile ND - Yellow Mastic 2 ND - Multicolored Debris

Table 1.0 Asbestos Sample Summary

Hazardous Materials Survey MET Center 6347 Plymouth Avenue Wellston, Missouri

Sample determined to contain >1% asbestos

Sample determined to contain <1% asbestos

ND = Non Detect, asbestos was not identified

Sample ID	Material	Sample Location	Analytical Results - Laboratory Description
35-2	Grey Splotch Floor Tile + Black Mastic (2nd)	2nd Level - NE Classroom	ND - Black Mastic
			ND - Yellow Mastic
			ND - Gray Floor Tile
			ND - Yellow Mastic 2
			ND - Multicolored Debris
36-1	Light Brown Cove Base + Mastic	2nd Level - Bath	ND - Light Brown Cove Base ND - Yellow Mastic
36-2	Light Brown Cove Base + Mastic	2nd Level - Entry	ND - Light Brown Cove Base
			ND - Yellow Mastic
			ND - Beige Fibrous Material with Paint
37-1	Floor Grout (1st)	1st Level - Entry	ND - Gray Grout
37-2	Floor Grout (1st)	1st Level - Hallway	ND - Gray Grout
38-1	Black Cove Base + Mastic (1st)	1st Level - Conference Room	ND - Yellow Mastic
			ND - Black Cove Base
38-2	Black Cove Base + Mastic (1st)	1st Level - East Hallway	ND - Yellow Mastic
			ND - Black Cove Base
39-1	Parapet Wall Black Mastic (3rd)	Exterior - 3rd Level Parapet Wall	12% Chrysotile - Black Mastic
39-2	Parapet Wall Black Mastic (3rd)	Exterior - 3rd Level Parapet Wall	12% Chrysotile - Black Mastic
40-1	White Roof Seam Caulk (3rd)	Exterior - 3rd Level Parapet Wall	ND - White Caulk
41-1	Wall Grout Exterior	Exterior - 3rd Level Parapet Wall	ND - Gray Grout
41-2	Wall Grout Exterior	Exterior - 1st Level Wall (south)	ND - Gray Grout
42-1	Window Caulk	Exterior - 1st Level Wall (south)	ND - Gray Caulk
42-2	Window Caulk	Exterior - 1st Level Wall (south)	ND - Gray Caulk

Table 2.0
Lead-Based Paint Survey Record Sheet with XRF Results

Inspector: Nicole Wise

Inspection Date: 9/22/25-9/23/25

Sample #	Paint Color	Description	Substrate	Room Number/ Location	Analysis (mg/cm ²)	Positive/ Negative	Side	Condition
1	N/A	Standardization - Calibration	N/A	N/A	1.00	N/A	N/A	N/A
2	N/A	Standardization - Calibration	N/A	N/A	0.96	N/A	N/A	N/A
3	N/A	Standardization - Calibration	N/A	N/A	1.02	N/A	N/A	N/A
4	N/A	Standardization - Calibration	N/A	N/A	1.00	N/A	N/A	N/A
5	White	Wall	CMU	Diesel Shop	0	Negative	C	Intact
6	White	Wall	Brick	Diesel Shop	0.03	Negative	C	Intact
7	White	Wall	Brick	Diesel Shop	1.34	Positive	C	Intact
8	White	Trim	Concrete	Diesel Shop	0.24	Negative	C	Intact
9	White	Beam	Metal	Diesel Shop	0.33	Negative	C	Intact
10	White	Vertical Beam	Metal	Diesel Shop	3.92	Positive	C	Intact
11	White	Vertical Beam	Metal	Diesel Shop	1.19	Positive	A	Intact
12	White	Trim	Concrete	Diesel Shop	0	Negative	B	Intact
13	White	Vertical Beam	Metal	Diesel Shop	0	Negative	B	Intact
14	White	Vertical Beam	Metal	Diesel Shop	0	Negative	B	Intact
15	Grey	Door	Metal	Diesel Shop	0	Negative	B	Intact
16	Blue	Door	Metal	Diesel Shop	0	Negative	B	Intact
17	Red	Trim	Metal	Diesel Shop	0	Negative	B	Intact
18	Red	Trim	Metal	Diesel Shop	0	Negative	B	Intact
19	White	Trim	Metal	Diesel Shop	0	Negative	B	Intact
20	White	Wall	Drywall	Diesel Shop	0	Negative	A	Intact
21	White	Beam	Metal	Diesel Shop	0.59	Negative	A	Intact
22	White	Beam	Metal	Diesel Shop	0.28	Negative	A	Intact
23	White	Beam	Metal	Diesel Shop	0.51	Negative	A	Intact
24	White	Beam	Metal	Diesel Shop	0.33	Negative	A	Intact
25	White	Vertical Beam	Metal	Diesel Shop	2.32	Positive	A	Intact
26	White	Vertical Beam	Metal	Diesel Shop	2.96	Positive	A	Intact
27	Blue	Door Frame	Metal	Diesel Shop	0	Negative	A	Intact
28	White	Door Frame	Metal	Diesel Shop	0	Negative	C	Intact
29	Grey	Stairs	Metal	Diesel Shop	0	Negative	A	Intact
30	Grey	Stair Rail	Metal	Diesel Shop	0	Negative	A	Intact
31	Grey	Trim	Metal	Diesel Shop	0	Negative	A	Intact
32	White	Trim	Metal	Diesel Shop	0	Negative	D	Intact
33	White	Door Frame	Metal	Diesel Shop	0	Negative	D	Intact
34	White	Door	Metal	Diesel Shop	0	Negative	D	Intact
35	White	Wall	Drywall	Low Bay	0	Negative	B	Intact
36	White	Wall	Drywall	Low Bay	0	Negative	A	Intact
37	White	Wall	CMU	Low Bay	0	Negative	C	Intact
38	White	Wall	Brick	Low Bay	0.48	Negative	C	Intact
39	White	Wall	Brick	Low Bay	0.18	Negative	C	Intact

Table 2.0
Lead-Based Paint Survey Record Sheet with XRF Results

40	White	Vertical Beam	Metal	Low Bay	1.18	Positive	C	Intact
41	White	Wall	Brick	Low Bay	0.23	Negative	C	Intact
42	White	Wall	Brick	Low Bay	0.62	Negative	C	Intact
43	Grey	Vertical Beam	Metal	Low Bay	4.04	Positive	A	Intact
44	White	Wall	Concrete	Low Bay	0	Negative	C	Intact
45	White	Wall	Concrete	Low Bay	0	Negative	C	Intact
46	White	Wall	Brick	Low Bay	1.27	Positive	C	Intact
47	White	Wall	Brick	Low Bay	5.18	Positive	C	Intact
48	White	Wall	Brick	Low Bay	0.39	Negative	C	Intact
49	White	Wall	Brick	Low Bay	1.33	Positive	C	Intact
50	White	Wall	Brick	Low Bay	0.7	Negative	C	Intact
51	White	Wall	Brick	Low Bay	0.35	Negative	C	Intact
52	White	Wall	Brick	Low Bay	0.36	Negative	C	Intact
53	White	Wall	Drywall	Low Bay	0.59	Negative	C	Intact
54	White	Wall	Drywall	Low Bay	0.55	Negative	C	Intact
55	White	Horizontal Beam	Metal	Low Bay	0.42	Negative	C	Intact
56	White	Horizontal Beam	Metal	Low Bay	0.25	Negative	C	Intact
57	White	Horizontal Beam	Metal	Low Bay	0.29	Negative	C	Intact
58	White	Horizontal Beam	Metal	Low Bay	0.26	Negative	C	Intact
59	Grey	Stair Rail	Metal	Low Bay	2.14	Positive	C	Intact
60	Grey	Stairs	Metal	Low Bay	0.59	Negative	C	Intact
61	Grey	Stair Riser	Metal	Low Bay	0.9	Negative	C	Intact
62	Grey	Stair Riser	Metal	Low Bay	0.25	Negative	C	Intact
63	Grey	Stair Riser	Metal	Low Bay	0.26	Negative	C	Intact
64	White	Wall	Drywall	Low Bay	0	Negative	B	Intact
65	White	Wall	Drywall	Low Bay	0	Negative	C	Intact
66	Green	Pillar	Concrete	Low Bay	2.23	Positive	D	Peeling
67	White	Pillar	Concrete	Low Bay	1.33	Positive	D	Peeling
68	Grey	Trim	Metal	Low Bay	0	Negative	D	Intact
69	Grey	Trim	Wood	Low Bay	0	Negative	D	Intact
70	White	Trim	Wood	Low Bay	0	Negative	D	Intact
71	Grey	Vertical Beam	Metal	Low Bay	1.04	Positive	D	Intact
72	White	Wall	Drywall	Low Bay Classrooms	0	Negative	C	Intact
73	White	Wall	Drywall	Low Bay Classrooms	0	Negative	D	Intact
74	Blue	Door	Metal	Low Bay Classrooms	0	Negative	A	Intact
75	Blue	Wall	Drywall	Low Bay Bathroom	0	Negative	C	Intact
76	Beige	Wall	Ceramic	Low Bay Bathroom	0	Negative	D	Intact
77	Yellow	Wall	Drywall	High Bay	0	Negative	C	Intact
78	Grey	Wall	Concrete	High Bay	0	Negative	C	Intact
79	Yellow	Wall	Brick	High Bay	1.24	Positive	A	Intact
80	Yellow	Trim	Concrete	High Bay	1.55	Positive	A	Intact
81	Yellow	Trim	Concrete	High Bay	5.37	Positive	A	Intact
82	Yellow	Wall	CMU	High Bay	0	Negative	A	Intact

Table 2.0
Lead-Based Paint Survey Record Sheet with XRF Results

83	Yellow	Wall	Vinyl	High Bay	0	Negative	B	Intact
84	White	Vertical Beam	Metal	High Bay	3.66	Positive	C	Intact
85	Blue	Door	Metal	High Bay	0	Negative	B	Intact
86	Blue	Door Frame	Metal	High Bay	0.25	Negative	B	Intact
87	Blue	Door Frame	Metal	High Bay	0.17	Negative	B	Intact
88	Yellow	Column	Concrete	High Bay	1.01	Positive	A	Intact
89	Yellow	Column	Concrete	High Bay	0.52	Negative	A	Intact
90	Yellow	Column	Concrete	High Bay	0.48	Negative	A	Intact
91	Yellow	Column	Concrete	High Bay	0.34	Negative	A	Intact
92	White	Vertical Beam	Metal	High Bay	3.39	Positive	A	Intact
93	Blue	Window	Vinyl	High Bay	0	Negative	A	Intact
94	Blue	Window Frame	Vinyl	High Bay	0	Negative	A	Intact
95	White	Wall	Drywall	High Bay	0	Negative	C	Intact
96	White	Wall	Drywall	High Bay	0	Negative	D	Intact
97	White	Wall	Brick	High Bay	0.14	Negative	C	Intact
98	White	Wall	Brick	High Bay	0.26	Negative	C	Intact
99	White	Wall	Brick	High Bay	0.04	Negative	C	Intact
100	Blue	Wall	Brick	High Bay	0.45	Negative	D	Intact
101	Blue	Wall	Brick	High Bay	0.44	Negative	D	Intact
102	Blue	Wall	Brick	High Bay	0.64	Negative	D	Intact
103	Blue	Column	Concrete	High Bay	0.62	Negative	D	Intact
104	Blue	Column	Concrete	High Bay	0.31	Negative	D	Intact
105	Yellow	Column	Concrete	High Bay	0	Negative	A	Intact
106	White	Wall	Drywall	6th Floor Office	0	Negative	D	Intact
107	White	Wall	Drywall	6th Floor Office	0	Negative	D	Intact
108	Blue	Door Frame	Metal	6th Floor Office	0	Negative	A	Intact
109	Blue	Door Frame	Metal	6th Floor Office	0	Negative	A	Intact
110	Blue	Door Frame	Metal	6th Floor Office	0	Negative	A	Intact
111	White	Wall	Drywall	6th Floor Office	0	Negative	B	Intact
112	White	Wall	Drywall	6th Floor Office	0	Negative	C	Intact
113	White	Wall	Ceramic	6th Floor Office	0	Negative	B	Intact
114	Blue	Window	Vinyl	6th Floor Office	0	Negative	D	Intact
115	Blue	Window Frame	Vinyl	6th Floor Office	0	Negative	D	Intact
116	Red	Cross Beam	Metal	6th Floor Office	1.28	Positive	D	Intact
117	Grey	Wall	Concrete	6th Floor Office Stairwell	0.79	Negative	D	Intact
118	Grey	Trim	Concrete	6th Floor Office Stairwell	0.2	Negative	D	Intact
119	White	Trim	Metal	6th Floor Office Stairwell	0.31	Negative	D	Intact
120	White	Stairs	Concrete	6th Floor Office Stairwell	0.47	Negative	D	Intact
121	White	Stairs	Concrete	6th Floor Office Stairwell	0.56	Negative	D	Intact
122	Blue	Stairs	Metal	6th Floor Office Stairwell	0.49	Negative	D	Intact
123	Blue	Stair Rail	Metal	6th Floor Office Stairwell	1.07	Positive	D	Intact

Table 2.0
Lead-Based Paint Survey Record Sheet with XRF Results

124	White	Wall	Drywall	5th Floor Office	0	Negative	A	Intact
125	White	Wall	Drywall	5th Floor Office	0	Negative	B	Intact
126	White	Wall	Drywall	5th Floor Office	0	Negative	B	Intact
127	White	Wall	Drywall	5th Floor Office	0	Negative	C	Intact
128	White	Wall	Drywall	5th Floor Office	0	Negative	C	Intact
129	Blue	Door Frame	Metal	5th Floor Office	0	Negative	D	Intact
130	Blue	Door Frame	Metal	5th Floor Office	0	Negative	D	Intact
131	Green	Wall	Plaster	5th Floor Office	0.22	Negative	C	Peeling
133	N/A	Standardization - Calibration	N/A	N/A	1.02	N/A	N/A	N/A
133	N/A	Standardization - Calibration	N/A	N/A	1.04	N/A	N/A	N/A
134	N/A	Standardization - Calibration	N/A	N/A	1.07	N/A	N/A	N/A
135	N/A	Standardization - Calibration	N/A	N/A	1.00	N/A	N/A	N/A
136	N/A	Standardization - Calibration	N/A	N/A	1.00	N/A	N/A	N/A
137	N/A	Standardization - Calibration	N/A	N/A	0.99	N/A	N/A	N/A
138	N/A	Standardization - Calibration	N/A	N/A	1.06	N/A	N/A	N/A
139	N/A	Standardization - Calibration	N/A	N/A	1.02	N/A	N/A	N/A
140	Green	Wall	Plaster	6th Floor Office	0.41	Negative	B	Peeling
141	Green	Wall	Plaster	6th Floor Office	0.01	Negative	B	Peeling
142	Green	Wall	Plaster	6th Floor Office	0.44	Negative	B	Peeling
143	Green	Wall	Plaster	6th Floor Office	0.13	Negative	B	Peeling
144	Black	Wall	Brick	6th Floor Office	0	Negative	A	Intact
145	Green	Wall	Concrete	6th Floor Office	0.09	Negative	A	Intact
146	Red	Horizontal Beam	Metal	6th Floor Office	0	Negative	B	Intact
147	White	Pillar	Concrete	5th Floor Office	1.31	Positive	A	Intact
148	Grey	Wall	Plaster	4th Floor Office Stairwell	0.03	Negative	D	Intact
149	Grey	Stairs	Metal	4th Floor Office Stairwell	0.71	Negative	D	Intact
150	White	Stairs	Metal	4th Floor Office Stairwell	0.68	Negative	D	Intact
151	White	Wall	Drywall	4th Floor Office	0	Negative	D	Intact
152	White	Door Frame	Metal	4th Floor Office	0	Negative	C	Intact
153	White	Wall	Drywall	4th Floor Office	0	Negative	C	Intact
154	White	Wall	Drywall	4th Floor Office	0	Negative	B	Intact
155	White	Wall	Drywall	4th Floor Office	0	Negative	A	Intact
156	Orange	Pillar	Concrete	3rd Floor Office	0.1	Negative	C	Intact
157	Orange	Pillar	Concrete	3rd Floor Office	0.02	Negative	C	Intact
158	Orange	Pillar	Concrete	3rd Floor Office	1.2	Positive	C	Intact
159	Orange	Pillar	Concrete	3rd Floor Office	0.16	Negative	C	Intact
160	Beige	Wall	Drywall	3rd Floor Office	0	Negative	C	Intact
161	White	Wall	Brick	3rd Floor Office Stairwell	1.57	Positive	D	Intact
162	White	Trim	Concrete	3rd Floor Office Stairwell	1.53	Positive	D	Intact
163	Beige	Wall	Drywall	3rd Floor Office	0	Negative	A	Intact
164	Beige	Wall	Drywall	3rd Floor Office	0	Negative	B	Intact
165	Beige	Wall	Concrete	3rd Floor Office	0.49	Negative	B	Intact

Table 2.0
Lead-Based Paint Survey Record Sheet with XRF Results

166	Beige	Ceiling	Concrete	3rd Floor Office	0.55	Negative	B	Intact
167	Beige	Ceiling	Concrete	3rd Floor Office	0.72	Negative	B	Intact
168	Beige	Ceiling	Concrete	3rd Floor Office	0.84	Negative	B	Intact
169	White	Wall	Brick	High Bay	0.27	Negative	C	Intact
170	White	Trim	Vinyl	High Bay	0	Negative	C	Intact
171	Black	Railing	Metal	High Bay	0	Negative	B	Intact
172	Blue	Trim	Wood	High Bay	0.04	Negative	D	Intact
173	Blue	Column	Concrete	High Bay	0.02	Negative	D	Intact
174	White	Horizontal Beam	Metal	High Bay	7.01	Positive	C	Intact
175	N/A	Standardization - Calibration	N/A	N/A	1.01	N/A	N/A	N/A
176	N/A	Standardization - Calibration	N/A	N/A	1.06	N/A	N/A	N/A
177	N/A	Standardization - Calibration	N/A	N/A	1.03	N/A	N/A	N/A
178	White	Pillar	Concrete	2nd Floor Office	0.2	Negative	D	Intact
179	White	Pillar	Concrete	2nd Floor Office	2.08	Positive	D	Intact
180	White	Pillar	Concrete	2nd Floor Office	0	Negative	B	Intact
181	White	Pillar	Concrete	2nd Floor Office	0.03	Negative	B	Intact
182	White	Pillar	Concrete	2nd Floor Office	0.16	Negative	B	Intact
183	White	Pillar	Concrete	2nd Floor Office	0.18	Negative	B	Intact
184	White	Wall	Drywall	2nd Floor Office	0	Negative	C	Intact
185	White	Wall	Drywall	2nd Floor Office	0	Negative	D	Intact
186	Orange	Pillar	Concrete	2nd Floor Office	0.11	Negative	C	Intact
187	Orange	Pillar	Concrete	2nd Floor Office	0.05	Negative	C	Intact
188	White	Wall	Drywall	2nd Floor Office	0	Negative	A	Intact
189	White	Wall	Drywall	2nd Floor Office	0	Negative	A	Intact
190	White	Wall	Drywall	2nd Floor Office	0	Negative	A	Intact
191	White	Column	Concrete	2nd Floor Office	1.56	Positive	B	Intact
192	White	Column	Concrete	2nd Floor Office	1.65	Positive	B	Intact
193	Blue	Column	Concrete	2nd Floor Office	0.28	Negative	D	Intact
194	Blue	Column	Concrete	2nd Floor Office	0.34	Negative	D	Intact
195	Blue	Column	Concrete	2nd Floor Office	0.34	Negative	D	Intact
196	White	Column	Concrete	2nd Floor Office	0.41	Negative	A	Intact
197	White	Column	Concrete	2nd Floor Office	0.48	Negative	A	Intact
198	White	Column	Concrete	2nd Floor Office	1.53	Positive	A	Intact
199	Orange	Pillar	Concrete	2nd Floor Office	0	Negative	C	Intact
200	Orange	Wall	Drywall	2nd Floor Office	0	Negative	D	Intact
201	Red	Pillar	Concrete	2nd Floor Office	0.21	Negative	B	Intact
202	Blue	Wall	Drywall	2nd Floor Office	0	Negative	B	Intact
203	Blue	Stair Rail	Metal	2nd Floor Office Stairwell	1.01	Positive	B	Intact
204	N/A	Standardization - Calibration	N/A	N/A	1	N/A	N/A	N/A
205	N/A	Standardization - Calibration	N/A	N/A	1.04	N/A	N/A	N/A
206	N/A	Standardization - Calibration	N/A	N/A	1.02	N/A	N/A	N/A
207	Orange	Pillar	Concrete	2nd Floor Office	0.03	Negative	C	Intact
208	Orange	Pillar	Concrete	1st Floor Office	2.75	Positive	D	Intact
209	Orange	Pillar	Concrete	1st Floor Office	0	Negative	D	Intact
210	Orange	Wall	Drywall	1st Floor Office	0	Negative	C	Intact

Table 2.0
Lead-Based Paint Survey Record Sheet with XRF Results

211	Orange	Wall	Drywall	1st Floor Office	0	Negative	B	Intact
212	White	Wall	Drywall	1st Floor Office	0	Negative	A	Intact
213	Blue	Door Frame	Plaster	1st Floor Office	0	Negative	C	Intact
214	White	Door Frame	Metal	1st Floor Office	0	Negative	C	Intact
215	Blue	Window	Vinyl	1st Floor Office	0	Negative	C	Intact
216	White	Column	Concrete	High Bay	0.53	Negative	C	Intact
217	Yellow	Column	Concrete	High Bay	0.12	Negative	C	Intact
218	Yellow	Column	Concrete	High Bay	0.58	Negative	A	Intact
219	Yellow	Column	Concrete	High Bay	0.94	Negative	A	Intact
220	Yellow	Column	Concrete	High Bay	1.07	Negative	A	Intact
221	Yellow	Column	Concrete	High Bay	1.00	Positive	A	Intact
222	N/A	Standardization - Calibration	N/A	N/A	1.04	N/A	N/A	N/A
223	N/A	Standardization - Calibration	N/A	N/A	1.03	N/A	N/A	N/A
224	N/A	Standardization - Calibration	N/A	N/A	1.02	N/A	N/A	N/A
225	N/A	Standardization - Calibration	N/A	N/A	0.96	N/A	N/A	N/A
226	N/A	Standardization - Calibration	N/A	N/A	0.96	N/A	N/A	N/A
227	N/A	Standardization - Calibration	N/A	N/A	0.96	N/A	N/A	N/A
228	N/A	Standardization - Calibration	N/A	N/A	0.96	N/A	N/A	N/A
229	Blue	Column	Concrete	Exterior	0	Negative	A	Intact
230	Blue	Column	Concrete	Exterior	0.01	Negative	A	Intact
231	Blue	Wall	Concrete	Exterior	0.01	Negative	A	Intact
232	White	Wall	Concrete	Exterior	0	Negative	A	Intact
233	N/A	Standardization - Calibration	N/A	N/A	1.02	N/A	N/A	N/A
234	N/A	Standardization - Calibration	N/A	N/A	1.02	N/A	N/A	N/A
235	N/A	Standardization - Calibration	N/A	N/A	1.07	N/A	N/A	N/A

CERTIFICATION NUMBER:
7000121720MOAS17997

THIS CERTIFIES
Andrew J. Barchak
HAS COMPLETED THE CERTIFICATION
REQUIREMENTS FOR
Air Sampling Professional



APPROVED: **12/17/2020**


Director of Air Pollution Control Program

CERTIFICATION NUMBER:
7011012425MOSR17997

THIS CERTIFIES
Andrew J. Barchak
HAS COMPLETED THE CERTIFICATION
REQUIREMENTS FOR
Supervisor



APPROVED: **02/20/2025**
EXPIRES: **02/20/2026**

TRAINING DATE: **01/24/2025**

Director of Air Pollution Control Program

CERTIFICATION NUMBER:
7011012325MOIR17997

THIS CERTIFIES
Andrew J. Barchak
HAS COMPLETED THE CERTIFICATION
REQUIREMENTS FOR
Inspector



APPROVED: **01/24/2025**
EXPIRES: **01/24/2026**

TRAINING DATE: **01/23/2025**

Director of Air Pollution Control Program

CERTIFICATION NUMBER:
7011030525MOPDR17997

THIS CERTIFIES
Andrew J. Barchak
HAS COMPLETED THE CERTIFICATION
REQUIREMENTS FOR
Project Designer



APPROVED: **03/07/2025**
EXPIRES: **03/07/2026**

TRAINING DATE: **03/05/2025**

Director of Air Pollution Control Program

CERTIFICATION NUMBER:
7011012325MOMPR17997

THIS CERTIFIES
Andrew J. Barchak
HAS COMPLETED THE CERTIFICATION
REQUIREMENTS FOR
Management Planner



APPROVED: **01/24/2025**
EXPIRES: **01/24/2026**

TRAINING DATE: **01/23/2025**

Director of Air Pollution Control Program

STATE OF MISSOURI
DEPARTMENT OF HEALTH AND SENIOR SERVICES

LEAD OCCUPATION LICENSE REGISTRATION

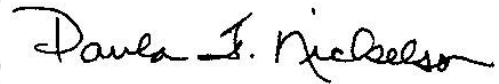
Issued to:

Nicole M. Wise

The person, firm or corporation whose name appears on this certificate has fulfilled the requirements for licensure as set forth in the Missouri Revised Statutes 701.300-701.338, as long as not suspended or revoked, and is hereby authorized to engage in the activity listed below.

Lead Inspector
Category of License

Issuance Date: **3/16/2024**
Expiration Date: **3/16/2026**
License Number: **200316-300005977**



Paula F. Nickelson
Director

Department of Health and Senior Services

Lead Licensing Program, PO Box 570, Jefferson City, MO 65102

APPENDIX B

Photographic Documentation

**Hazardous Materials Survey
MET Center
6347 Plymouth Avenue
Wellston, Missouri**

**Photographed by: Andrew Barchak and Nicole Wise
on September 22 and 23, 2025**



Representative view of south and west sides of the building.



Representative view of east side of the building.

**Hazardous Materials Survey
MET Center
6347 Plymouth Avenue
Wellston, Missouri**

**Photographed by: Andrew Barchak and Nicole Wise
on September 22 and 23, 2025**



1. View of 6th level southwest storage room, black cove base tested positive for asbestos with a content of 8% Chrysotile. (Sample 25-1)



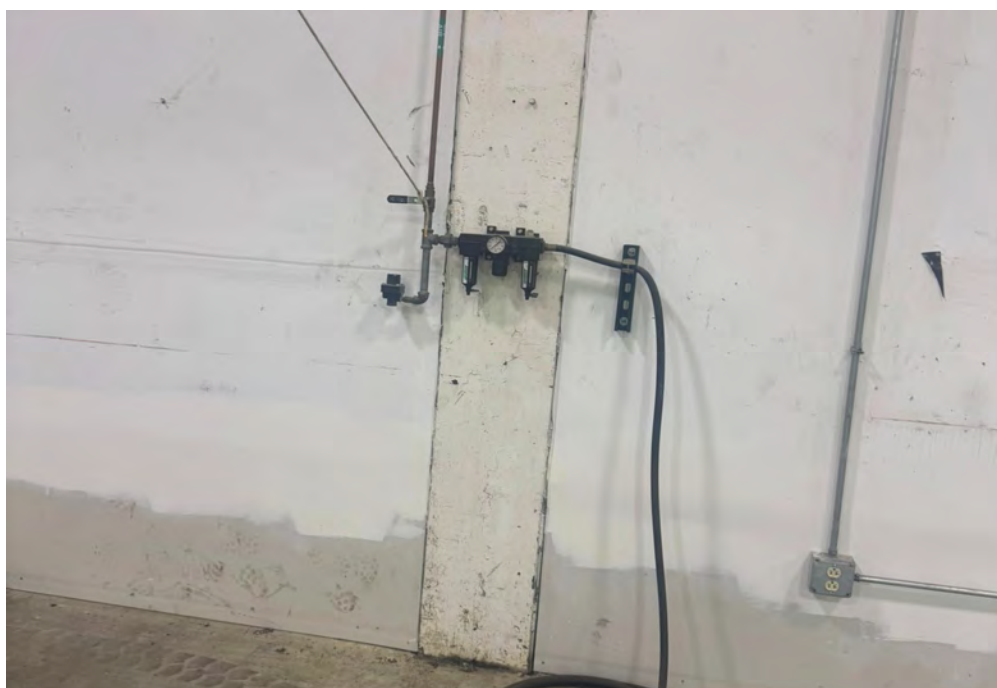
2. View of exterior 3rd level southeast roof, black mastic tested positive for asbestos with a chrysotile content of 12%. (Samples 39-1 and 39-2)

**Hazardous Materials Survey
MET Center
6347 Plymouth Avenue
Wellston, Missouri**

**Photographed by: Andrew Barchak and Nicole Wise
on September 22 and 23, 2025**



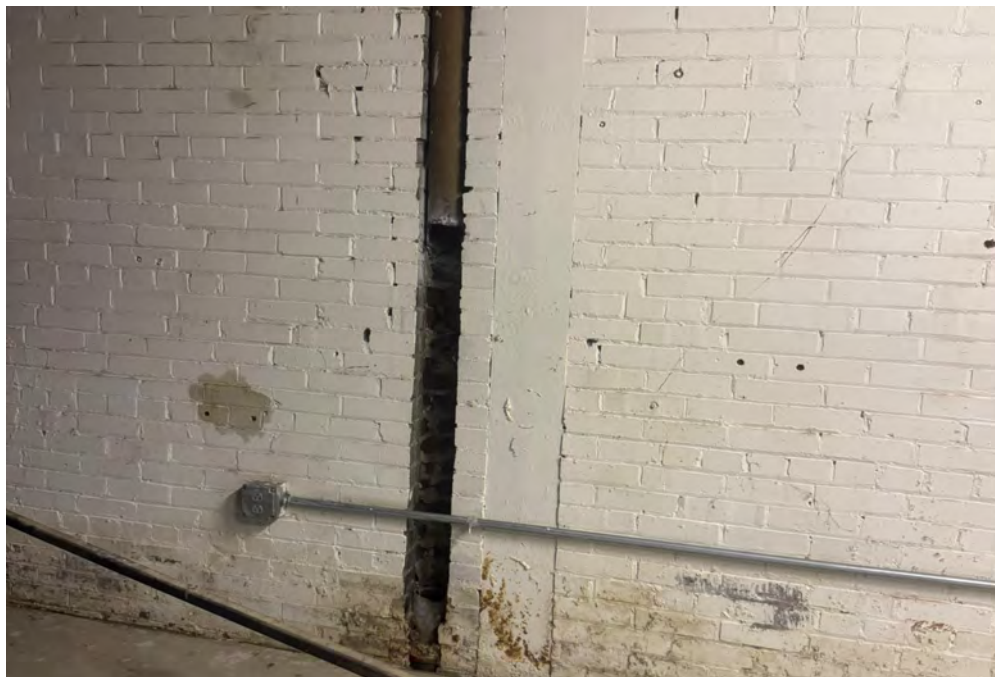
3. View of LBP on brick wall along east side of Diesel Shop (#7)



4. View of LBP on metal vertical beam in Diesel Shop (#25, 26)

**Hazardous Materials Survey
MET Center
6347 Plymouth Avenue
Wellston, Missouri**

**Photographed by: Andrew Barchak and Nicole Wise
on September 22 and 23, 2025**



5. View of LBP on brick wall and metal vertical beam along east wall of Low Bay (#46, 40)



6. View of LBP on metal vertical beam in Low Bay (#43)

**Hazardous Materials Survey
MET Center
6347 Plymouth Avenue
Wellston, Missouri**

**Photographed by: Andrew Barchak and Nicole Wise
on September 22 and 23, 2025**



7. View of LBP on concrete pillar along south wall of Low Bay (#66, 67)



8. View of LBP on brick wall and concrete trim along northwestern side of High Bay (#79, 80, 81)

**Hazardous Materials Survey
MET Center
6347 Plymouth Avenue
Wellston, Missouri**

**Photographed by: Andrew Barchak and Nicole Wise
on September 22 and 23, 2025**



9. View of LBP on vertical metal beam in High Bay (#92)



10. View of concrete column with LBP in High Bay along west wall (#88)

**Hazardous Materials Survey
MET Center
6347 Plymouth Avenue
Wellston, Missouri**

**Photographed by: Andrew Barchak and Nicole Wise
on September 22 and 23, 2025**



11. View of LBP on stair rail in office tower stairwells (#123)



12. View of LBP on concrete pillar in the 5th floor office (#147)

**Hazardous Materials Survey
MET Center
6347 Plymouth Avenue
Wellston, Missouri**

**Photographed by: Andrew Barchak and Nicole Wise
on September 22 and 23, 2025**



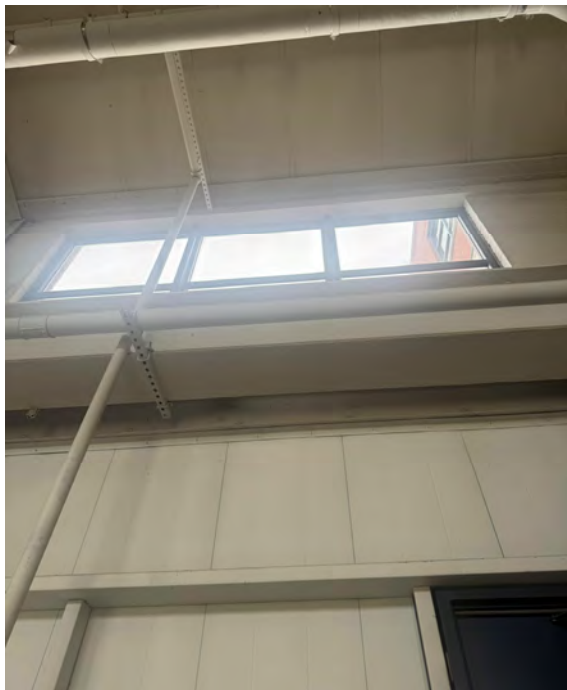
13. View of LBP on concrete pillar in 3rd floor office (#158)



12. View of LBP on brick wall and concrete trim in office stairwell (#161, 162)

**Hazardous Materials Survey
MET Center
6347 Plymouth Avenue
Wellston, Missouri**

**Photographed by: Andrew Barchak and Nicole Wise
on September 22 and 23, 2025**



15. View of horizontal beam in High Bay with LBP (#174)



16. View of LBP on concrete column in 2nd floor office (#191)

Report for:

Mr Andrew Barchak, Nick Godfrey, Nicole Wise
Environmental Works
1455 E. Chestnut Expy
Springfield, MO 65802

Regarding: Eurofins Built Environment Testing East, LLC
Project: 252049.01; Asbestos Inspection - 6347 Plymouth Ave, St. Louis, MO 63133
EML ID: 4242277

Approved by:

Dates of Analysis:
Asbestos PLM: 09-29-2025



Approved Signatory
Alexis Starrett

Service SOPs: Asbestos PLM (EPA 40CFR App E to Sub E of Part 763 & EPA METHOD 600/R-93-116, SOP EB-AS-S-1267)
NVLAP Lab Code 201060-0

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. The results relate only to the samples as received and tested. The results include an inherent uncertainty of measurement associated with estimating percentages by polarized light microscopy. Measurement uncertainty data for sample results with >1% asbestos concentration can be provided when requested.

Eurofins Built Environment Testing East, LLC ("the Company"), a member of the Eurofins Built Environment Testing group of companies, shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Client: Environmental Works
C/O: Mr Andrew Barchak, Nick Godfrey, Nicole
Wise
Re: 252049.01; Asbestos Inspection - 6347 Plymouth
Ave, St. Louis, MO 63133

Eurofins Built Environment Testing East, LLC
6215 Regency Parkway, Suite 900, Norcross, GA 30071
(866) 871-1984 www.eurofinsus.com/Built

Date of Sampling: 09-23-2025
Date of Receipt: 09-25-2025
Date of Report: 09-30-2025

ASBESTOS PLM REPORT

Total Samples Submitted:	93
Total Samples Analyzed:	93
Total Samples with Layer Asbestos Content > 1%:	3

Location: 1-1, Fireproofing (1)

Lab ID-Version‡: 21218209-1

Sample Layers	Asbestos Content
Yellow Foam	ND
White Non-Fibrous Material	ND
White Fibrous Material	ND
Composite Non-Asbestos Content:	40% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 1-2, Fireproofing (1)

Lab ID-Version‡: 21218210-1

Sample Layers	Asbestos Content
Yellow Foam	ND
White Fibrous Material	ND
Composite Non-Asbestos Content:	60% Cellulose
Sample Composite Homogeneity:	Good

Location: 1-3, Fireproofing (1)

Lab ID-Version‡: 21218211-1

Sample Layers	Asbestos Content
Yellow Foam	ND
White Fibrous Material	ND
Composite Non-Asbestos Content:	60% Cellulose
Sample Composite Homogeneity:	Good

Location: 1-4, Fireproofing (1)

Lab ID-Version‡: 21218212-1

Sample Layers	Asbestos Content
White Fibrous Material	ND
Composite Non-Asbestos Content:	95% Mineral Wool
Sample Composite Homogeneity:	Good

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All components not quantified as asbestos content and non-asbestos content are considered to be non-fibrous matrix components. Matrix components may include, but are not limited to, gypsum, paint, silicate minerals, vinyl, binder, calcium carbonate, tar, and foam.

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Wise
Re: 252049.01; Asbestos Inspection - 6347 Plymouth
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ASBESTOS PLM REPORT

Location: 1-5, Fireproofing (1)

Lab ID-Version‡: 21218213-1

Sample Layers	Asbestos Content
White Fibrous Material	ND
Composite Non-Asbestos Content:	95% Mineral Wool
Sample Composite Homogeneity:	Good

Location: 2-1, Duct Mastic

Lab ID-Version‡: 21218214-1

Sample Layers	Asbestos Content
Gray Mastic	ND
Gray Mastic 2	ND
Composite Non-Asbestos Content:	2% Cellulose
Sample Composite Homogeneity:	Good

Location: 2-2, Duct Mastic

Lab ID-Version‡: 21218215-1

Sample Layers	Asbestos Content
Gray Mastic	ND
Sample Composite Homogeneity:	Good

Location: 3-1, Drywall Composite (Tape/Joint/Drywall) - White (1)

Lab ID-Version‡: 21218216-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

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ASBESTOS PLM REPORT

Location: 3-2, Drywall Composite (Tape/Joint/Drywall) - White (1)

Lab ID-Version‡: 21218217-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 3-3, Drywall Composite (Tape/Joint/Drywall) - White (1)

Lab ID-Version‡: 21218218-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 3-4, Drywall Composite (Tape/Joint/Drywall) - White (1)

Lab ID-Version‡: 21218219-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

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ASBESTOS PLM REPORT

Location: 3-5, Drywall Composite (Tape/Joint/Drywall) - White (1)

Lab ID-Version‡: 21218220-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 4-1, Expansion Joint

Lab ID-Version‡: 21218221-1

Sample Layers	Asbestos Content
Brown Fibrous Material	ND
Composite Non-Asbestos Content:	85% Cellulose
Sample Composite Homogeneity:	Good

Location: 4-2, Expansion Joint

Lab ID-Version‡: 21218222-1

Sample Layers	Asbestos Content
Yellow Foam	ND
Brown Fibrous Material	ND
Composite Non-Asbestos Content:	85% Cellulose
Sample Composite Homogeneity:	Good

Location: 4-3, Expansion Joint

Lab ID-Version‡: 21218223-1

Sample Layers	Asbestos Content
Brown Fibrous Material	ND
Gray Non-Fibrous Material with Paint	ND
Composite Non-Asbestos Content:	85% Cellulose
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT

Location: 5-1, Floor Tile + Mastic (Diesel Offices)

Lab ID-Version‡: 21218224-1

Sample Layers	Asbestos Content
Brown Wood	ND
Yellow Mastic	ND
White Floor Tile	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 5-2, Floor Tile + Mastic (Diesel Offices)

Lab ID-Version‡: 21218225-1

Sample Layers	Asbestos Content
Brown Wood	ND
Yellow Mastic	ND
White Floor Tile	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 6-1, ACT (Diesel Offices)

Lab ID-Version‡: 21218226-1

Sample Layers	Asbestos Content
Yellow Insulation	ND
Beige Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	50% Mineral Wool 40% Cellulose
Sample Composite Homogeneity:	Good

Location: 6-2, ACT (Diesel Offices)

Lab ID-Version‡: 21218227-1

Sample Layers	Asbestos Content
Yellow Insulation	ND
Beige Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	50% Mineral Wool 40% Cellulose
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT

Location: 7-1, Yellow Wall Mastic

Lab ID-Version‡: 21218228-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
Yellow Mastic	ND
Composite Non-Asbestos Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 8-1, Ceiling Drywall (Lower Bay)

Lab ID-Version‡: 21218229-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
Silver Non-Fibrous Material with Paint	ND
Composite Non-Asbestos Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 8-2, Ceiling Drywall (Lower Bay)

Lab ID-Version‡: 21218230-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
Silver Non-Fibrous Material with Paint	ND
Composite Non-Asbestos Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 9-1, Cove Base + Mastic (Lower Bay)

Lab ID-Version‡: 21218231-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Gray Cove Base	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT

Location: 9-2, Cove Base + Mastic (Lower Bay)

Lab ID-Version‡: 21218232-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Gray Cove Base	ND
Sample Composite Homogeneity: Good	

Location: 10-1, Grout (high bay bath)

Lab ID-Version‡: 21218233-1

Sample Layers	Asbestos Content
White Grout	ND
Sample Composite Homogeneity: Good	

Location: 10-2, asdfGrout (high bay bath)

Lab ID-Version‡: 21218234-1

Sample Layers	Asbestos Content
White Compound	ND
Gray Grout	ND
Sample Composite Homogeneity: Good	

Location: 11-1, Light Brown Floor Tile + Mastic

Lab ID-Version‡: 21218235-1

Sample Layers	Asbestos Content
Black Mastic	ND
Yellow Mastic	ND
Tan Floor Tile	ND
Sample Composite Homogeneity: Moderate	

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ASBESTOS PLM REPORT

Location: 11-2, Light Brown Floor Tile + Mastic

Lab ID-Version‡: 21218236-1

Sample Layers	Asbestos Content
White Compound	ND
Yellow Mastic	ND
Tan Floor Tile	ND
Sample Composite Homogeneity: Moderate	

Location: 12-1, Wall Sheeting + Mastic

Lab ID-Version‡: 21218237-1

Sample Layers	Asbestos Content
Tan Mastic	ND
White Non-Fibrous Material	ND
White Caulk	ND
Sample Composite Homogeneity: Moderate	

Location: 12-2, Wall Sheeting + Mastic

Lab ID-Version‡: 21218238-1

Sample Layers	Asbestos Content
Tan Mastic	ND
White Non-Fibrous Material	ND
White Caulk	ND
Sample Composite Homogeneity: Moderate	

Location: 13-1, Window Caulk

Lab ID-Version‡: 21218239-1

Sample Layers	Asbestos Content
Gray Caulk with Paint	ND
Sample Composite Homogeneity: Good	

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ASBESTOS PLM REPORT

Location: 13-2, Window Caulk

Lab ID-Version‡: 21218240-1

Sample Layers	Asbestos Content
Gray Caulk with Paint	ND
Sample Composite Homogeneity:	Good

Location: 14-1, Fireproofing (2)

Lab ID-Version‡: 21218241-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Non-Asbestos Content:	45% Cellulose
Sample Composite Homogeneity:	Good

Location: 14-2, Fireproofing (2)

Lab ID-Version‡: 21218242-1

Sample Layers	Asbestos Content
Gray Fireproofing	ND
Composite Non-Asbestos Content:	45% Cellulose
Sample Composite Homogeneity:	Good

Location: 14-3, Fireproofing (2)

Lab ID-Version‡: 21218243-1

Sample Layers	Asbestos Content
Beige Fireproofing	ND
Composite Non-Asbestos Content:	20% Cellulose 3% Vermiculite
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT

Location: 15-1, White Floor Tile + Yellow Mastic

Lab ID-Version‡: 21218244-1

Sample Layers	Asbestos Content
White Cementitious Material	ND
Yellow Mastic	ND
White Floor Tile	ND
Sample Composite Homogeneity: Moderate	

Location: 15-2, White Floor Tile + Yellow Mastic

Lab ID-Version‡: 21218245-1

Sample Layers	Asbestos Content
White Cementitious Material	ND
Yellow Mastic	ND
White Floor Tile	ND
Sample Composite Homogeneity: Moderate	

Location: 15-3, White Floor Tile + Yellow Mastic

Lab ID-Version‡: 21218246-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
White Floor Tile	ND
Sample Composite Homogeneity: Good	

Location: 16-1, Grey Cove Base + Mastic

Lab ID-Version‡: 21218247-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Gray Cove Base	ND
Sample Composite Homogeneity: Good	

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ASBESTOS PLM REPORT

Location: 16-2, Grey Cove Base + Mastic

Lab ID-Version‡: 21218248-1

Sample Layers	Asbestos Content
White Fibrous Material with Paint	ND
Yellow Mastic	ND
Gray Cove Base	ND
Composite Non-Asbestos Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 16-3, Grey Cove Base + Mastic

Lab ID-Version‡: 21218249-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Gray Cove Base	ND
Sample Composite Homogeneity:	Good

Location: 17-1, Bathroom Grout

Lab ID-Version‡: 21218250-1

Sample Layers	Asbestos Content
Gray Grout	ND
Sample Composite Homogeneity:	Good

Location: 17-2, Bathroom Grout

Lab ID-Version‡: 21218251-1

Sample Layers	Asbestos Content
Gray Grout	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT

Location: 17-3, Bathroom Grout

Lab ID-Version‡: 21218252-1

Sample Layers	Asbestos Content
Gray/White Grout	ND
Gray Ceramic Tile	ND
Sample Composite Homogeneity: Good	

Location: 18-1, ACT (2) (6th Offices)

Lab ID-Version‡: 21218253-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	45% Cellulose 45% Mineral Wool
Sample Composite Homogeneity: Good	

Location: 18-2, ACT (2) (6th Offices)

Lab ID-Version‡: 21218254-1

Sample Layers	Asbestos Content
Gray Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	45% Cellulose 45% Mineral Wool
Sample Composite Homogeneity: Good	

Location: 19-1, Plaster + Skim Coat (top 3 levels)

Lab ID-Version‡: 21218255-1

Sample Layers	Asbestos Content
Tan Plaster	ND
Beige Plaster	ND
White Skim Coat with Paint	ND
Sample Composite Homogeneity: Moderate	

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Ave, St. Louis, MO 63133

Eurofins Built Environment Testing East, LLC
6215 Regency Parkway, Suite 900, Norcross, GA 30071
(866) 871-1984 www.eurofinsus.com/Built

Date of Sampling: 09-23-2025
Date of Receipt: 09-25-2025
Date of Report: 09-30-2025

ASBESTOS PLM REPORT

Location: 19-2, Plaster + Skim Coat (top 3 levels)

Lab ID-Version‡: 21218256-1

Sample Layers	Asbestos Content
Beige Plaster	ND
White Skim Coat with Paint	ND
Sample Composite Homogeneity: Good	

Location: 19-3, Plaster + Skim Coat (top 3 levels)

Lab ID-Version‡: 21218257-1

Sample Layers	Asbestos Content
Tan Plaster	ND
Beige Plaster	ND
White Skim Coat with Paint	ND
Sample Composite Homogeneity: Moderate	

Location: 20-1, Black Wall Coating

Lab ID-Version‡: 21218258-1

Sample Layers	Asbestos Content
Off-White Cementitious Material	ND
Black Coating	ND
Sample Composite Homogeneity: Good	

Location: 20-2, Black Wall Coating

Lab ID-Version‡: 21218259-1

Sample Layers	Asbestos Content
Off-White Cementitious Material	ND
Black Coating	ND
Sample Composite Homogeneity: Good	

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ASBESTOS PLM REPORT

Location: 21-1, Drywall Composite (Tape/Joint/Drywall) - White (2)

Lab ID-Version‡: 21218260-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	5% Cellulose
Sample Composite Homogeneity:	Good

Location: 21-2, Drywall Composite (Tape/Joint/Drywall) - White (2)

Lab ID-Version‡: 21218261-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 21-3, Drywall Composite (Tape/Joint/Drywall) - White (2)

Lab ID-Version‡: 21218262-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 22-1, ACT (3) (4/5 Offices)

Lab ID-Version‡: 21218263-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	60% Cellulose 30% Mineral Wool
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT

Location: 22-2, ACT (3) (4/5 Offices)

Lab ID-Version‡: 21218264-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	60% Cellulose 30% Mineral Wool
Sample Composite Homogeneity:	Good

Location: 23-1, Drywall Composite (Tape/Joint/Drywall) - (Pink)

Lab ID-Version‡: 21218265-1

Sample Layers	Asbestos Content
Off-White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 23-2, Drywall Composite (Tape/Joint/Drywall) - (Pink)

Lab ID-Version‡: 21218266-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 24-1, Red Brick + Black Coating

Lab ID-Version‡: 21218267-1

Sample Layers	Asbestos Content
Red Brick	ND
Black Coating	ND
Sample Composite Homogeneity:	Good

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ASBESTOS PLM REPORT

Location: 24-2, Red Brick + Black Coating

Lab ID-Version‡: 21218268-1

Sample Layers	Asbestos Content
Red Brick	ND
Black Coating	ND
Sample Composite Homogeneity: Good	

Location: 25-1, Black Cove Base + Mastic (6th)

Lab ID-Version‡: 21218269-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Black Cove Base	8% Chrysotile
White Semi-Fibrous Material	ND
Composite Non-Asbestos Content: 3% Cellulose	
Sample Composite Homogeneity: Moderate	

Location: 26-1, Grey Flooring (6th Stairs)

Lab ID-Version‡: 21218270-1

Sample Layers	Asbestos Content
Gray Flooring	ND
Sample Composite Homogeneity: Good	

Location: 26-2, Grey Flooring (6th Stairs)

Lab ID-Version‡: 21218271-1

Sample Layers	Asbestos Content
Gray Non-Fibrous Material	ND
Yellow Mastic	ND
Gray Flooring	ND
Sample Composite Homogeneity: Moderate	

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ASBESTOS PLM REPORT

Location: 27-1, Beige Floor Tile + Mastic

Lab ID-Version‡: 21218272-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Beige Floor Tile	ND
Yellow Mastic 2	ND
Sample Composite Homogeneity: Moderate	

Location: 27-2, Beige Floor Tile + Mastic

Lab ID-Version‡: 21218273-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Beige Floor Tile	ND
Yellow Mastic 2	ND
Sample Composite Homogeneity: Moderate	

Location: 28-1, Grey Splotch Floor Tile + Black Mastic (3rd)

Lab ID-Version‡: 21218274-1

Sample Layers	Asbestos Content
Black Mastic	ND
Gray Floor Tile	ND
Sample Composite Homogeneity: Good	

Location: 28-2, Grey Splotch Floor Tile + Black Mastic (3rd)

Lab ID-Version‡: 21218275-1

Sample Layers	Asbestos Content
Black Mastic	ND
Gray Floor Tile	ND
Sample Composite Homogeneity: Good	

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ASBESTOS PLM REPORT

Location: 29-1, Brown Floor Tile + Yellow Mastic (3rd)

Lab ID-Version‡: 21218276-1

Sample Layers	Asbestos Content
Multicolored Debris	ND
White Leveling Compound	ND
Gray Non-Fibrous Material	ND
Yellow Mastic	ND
Brown Floor Tile	ND
Composite Non-Asbestos Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 29-2, Brown Floor Tile + Yellow Mastic (3rd)

Lab ID-Version‡: 21218277-1

Sample Layers	Asbestos Content
Multicolored Debris	ND
Transparent Non-Fibrous Material	ND
Brown Floor Tile	ND
Composite Non-Asbestos Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 30-1, Grey Stair Tiles + Mastic (3rd)

Lab ID-Version‡: 21218278-1

Sample Layers	Asbestos Content
Brown Debris	ND
Yellow Mastic	ND
Gray Stair Tread	ND
Composite Non-Asbestos Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

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ASBESTOS PLM REPORT

Location: 30-2, Grey Stair Tiles + Mastic (3rd)

Lab ID-Version‡: 21218279-1

Sample Layers	Asbestos Content
Brown Debris	ND
Yellow Mastic	ND
Gray Stair Tread	ND
Composite Non-Asbestos Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 31-1, ACT (4) (3rd Offices)

Lab ID-Version‡: 21218280-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	60% Cellulose 30% Mineral Wool
Sample Composite Homogeneity:	Good

Location: 31-2, ACT (4) (3rd Offices)

Lab ID-Version‡: 21218281-1

Sample Layers	Asbestos Content
Beige Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	60% Cellulose 30% Mineral Wool
Sample Composite Homogeneity:	Good

Location: 32-1, Drywall Composite (Tape/Joint/Drywall) - White (3)

Lab ID-Version‡: 21218282-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

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ASBESTOS PLM REPORT

Location: 32-2, Drywall Composite (Tape/Joint/Drywall) - White (3)

Lab ID-Version‡: 21218283-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Beige Tape	ND
White Compound with Paint	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 33-1, White Cove Base + Mastic

Lab ID-Version‡: 21218284-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
White Cove Base	ND
Sample Composite Homogeneity:	Good

Location: 34-1, Yellow Checkered Floor Tile + Mastic

Lab ID-Version‡: 21218285-1

Sample Layers	Asbestos Content
Gray Debris	ND
Yellow Mastic	ND
Tan Floor Tile	ND
Yellow Mastic 2	ND
Composite Non-Asbestos Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

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ASBESTOS PLM REPORT

Location: 34-2, Yellow Checkered Floor Tile + Mastic

Lab ID-Version‡: 21218286-1

Sample Layers	Asbestos Content
Gray Debris	ND
Yellow Mastic	ND
Tan Floor Tile	ND
Yellow Mastic 2	ND
Composite Non-Asbestos Content:	2% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 35-1, Grey Splotch Floor Tile + Black Mastic (2nd)

Lab ID-Version‡: 21218287-1

Sample Layers	Asbestos Content
Black Mastic	ND
Yellow Mastic	ND
Gray Floor Tile	ND
Yellow Mastic 2	ND
Multicolored Debris	ND
Composite Non-Asbestos Content:	3% Cellulose
Sample Composite Homogeneity:	Moderate

Location: 35-2, Grey Splotch Floor Tile + Black Mastic (2nd)

Lab ID-Version‡: 21218288-1

Sample Layers	Asbestos Content
Black Mastic	ND
Yellow Mastic	ND
Gray Floor Tile	ND
Yellow Mastic 2	ND
Multicolored Debris	ND
Composite Non-Asbestos Content:	3% Cellulose
Sample Composite Homogeneity:	Moderate

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ASBESTOS PLM REPORT

Location: 36-1, Light Brown Cove Base + Mastic

Lab ID-Version‡: 21218289-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Light Brown Cove Base	ND
Sample Composite Homogeneity: Good	

Location: 36-2, Light Brown Cove Base + Mastic

Lab ID-Version‡: 21218290-1

Sample Layers	Asbestos Content
Beige Fibrous Material with Paint	ND
Yellow Mastic	ND
Light Brown Cove Base	ND
Composite Non-Asbestos Content:	2% Cellulose
Sample Composite Homogeneity: Moderate	

Location: 37-1, Floor Grout (1st)

Lab ID-Version‡: 21218291-1

Sample Layers	Asbestos Content
Gray Grout	ND
Sample Composite Homogeneity: Good	

Location: 37-2, Floor Grout (1st)

Lab ID-Version‡: 21218292-1

Sample Layers	Asbestos Content
Gray Grout	ND
Sample Composite Homogeneity: Good	

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ASBESTOS PLM REPORT

Location: 38-1, Black Cove Base + Mastic (1st)

Lab ID-Version‡: 21218293-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Black Cove Base	ND
Sample Composite Homogeneity: Good	

Location: 38-2, Black Cove Base + Mastic (1st)

Lab ID-Version‡: 21218294-1

Sample Layers	Asbestos Content
Yellow Mastic	ND
Black Cove Base	ND
Sample Composite Homogeneity: Good	

Comments: Insufficient compound with paint present for analysis.

Location: 39-1, Parapet Wall Black Mastic (3rd)

Lab ID-Version‡: 21218295-1

Sample Layers	Asbestos Content
Black Mastic	12% Chrysotile
Sample Composite Homogeneity: Good	

Location: 39-2, Parapet Wall Black Mastic (3rd)

Lab ID-Version‡: 21218296-1

Sample Layers	Asbestos Content
Black Mastic	12% Chrysotile
Sample Composite Homogeneity: Good	

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ASBESTOS PLM REPORT

Location: 40-1, White Roof Seam Caulk (3rd)

Lab ID-Version‡: 21218297-1

Sample Layers	Asbestos Content
White Caulk	ND
Sample Composite Homogeneity: Good	

Location: 41-1, Wall Grout Exterior

Lab ID-Version‡: 21218298-1

Sample Layers	Asbestos Content
Gray Grout	ND
Sample Composite Homogeneity: Good	

Location: 41-2, Wall Grout Exterior

Lab ID-Version‡: 21218299-1

Sample Layers	Asbestos Content
Gray Grout	ND
Sample Composite Homogeneity: Good	

Location: 42-1, Window Caulk

Lab ID-Version‡: 21218300-1

Sample Layers	Asbestos Content
Gray Caulk	ND
Sample Composite Homogeneity: Good	

Location: 42-2, Window Caulk

Lab ID-Version‡: 21218301-1

Sample Layers	Asbestos Content
Gray Caulk	ND
Sample Composite Homogeneity: Good	

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All components not quantified as asbestos content and non-asbestos content are considered to be non-fibrous matrix components. Matrix components may include, but are not limited to, gypsum, paint, silicate minerals, vinyl, binder, calcium carbonate, tar, and foam.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.

‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

Client: Environmental Works
C/O: Mr Andrew Barchak, Nick Godfrey, Nicole
Wise
Re: 252049.01; Asbestos Inspection - 6347 Plymouth
Ave, St. Louis, MO 63133

Eurofins Built Environment Testing East, LLC
6215 Regency Parkway, Suite 900, Norcross, GA 30071
(866) 871-1984 www.eurofinsus.com/Built

Date of Sampling: 09-23-2025
Date of Receipt: 09-25-2025
Date of Report: 09-30-2025

ASBESTOS PLM REPORT

PROJECT ANALYST AND SIGNATORY REPORT

Project Analyst



Analyst: Catherine Bailey

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‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

CHAIN OF CUSTODY
www.eurofinsus.com/Built

New Jersey: 3000 Lincoln Drive East, Suite A, Marlton, NJ 08053 * (866) 871-1984
Phoenix, AZ: 1501 West Knudsen Drive, Phoenix, AZ 85027 * (800) 651-4802
Burlingame, CA: 111 Anza Blvd., Suite 122, Burlingame, CA 94010 * (833) 465-5857

Table with 6 columns: Weather, Fog, Rain, Snow, Wind, Clear. Includes a Level column with options: None, Light, Moderate, Heavy.

Table with 2 columns: EMLab ID, 4242277

REQUESTED SERVICES (Use checkboxes below)
Asbestos PLM
Grid of checkboxes for requested services.

CONTACT INFORMATION
PROJECT INFORMATION
TURN AROUND TIME CODES (TAT)
Table with 7 columns: Sample ID, Description, Sample Type, TAT, Volume / Area, ISO Class, Notes.

SAMPLE TYPE CODES
RELINQUISHED BY
DATE & TIME
RECEIVED BY
DATE & TIME

CHAIN OF CUSTODY
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Table with 6 columns: Weather, Fog, Rain, Snow, Wind, Clear. Includes a Level section with options: None, Light, Moderate, Heavy.

Table with 2 columns: EMLab ID, 4242277

REQUESTED SERVICES (Use checkboxes below)
Asbestos PLM
Grid of checkboxes for service selection.

CONTACT INFORMATION
PROJECT INFORMATION
TURN AROUND TIME CODES (TAT)
Table with 7 columns: Sample ID, Description, Sample Type, TAT, Volume / Area, ISO Class, Notes. Includes a large text block for TAT codes and a detailed sample log.

SAMPLE TYPE CODES
RELINQUISHED BY
DATE & TIME
RECEIVED BY
DATE & TIME
Signature and date fields for sample handover.

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Table with 6 columns: Weather, Fog, Rain, Snow, Wind, Clear. Includes a Level column with options: None, Light, Moderate, Heavy.

Table with 2 columns: EMLab ID, 4242277

REQUESTED SERVICES (Use checkboxes below)
Asbestos PLM
Grid of checkboxes for various services.

CONTACT INFORMATION
PROJECT INFORMATION
TURN AROUND TIME CODES (TAT)
Table with 7 columns: Sample ID, Description, Sample Type, TAT, Volume / Area, ISO Class, Notes. Includes a large text block for TAT codes.

SAMPLE TYPE CODES
RELINQUISHED BY
DATE & TIME
RECEIVED BY
DATE & TIME
Table with 5 columns for tracking sample types and signatures.

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Burlingame, CA: 111 Anza Blvd., Suite 122, Burlingame, CA 94010 * (833) 465-5857

Table with 6 columns: Weather, Fog, Rain, Snow, Wind, Clear. Includes a Level column with options: None, Light, Moderate, Heavy.

Table with 2 columns: EMLab ID, 4242277

REQUESTED SERVICES (Use checkboxes below)
Asbestos PLM
Grid of checkboxes for various services.

CONTACT INFORMATION
PROJECT INFORMATION
TURN AROUND TIME CODES (TAT)
Table with 7 columns: Sample ID, Description, Sample Type, TAT, Volume / Area, ISO Class, Notes. Includes a large text block for TAT codes and a table for sample data.

SAMPLE TYPE CODES
RELINQUISHED BY
DATE & TIME
RECEIVED BY
DATE & TIME
Signature of Sheri McGraw, Laboratory Manager

CHAIN OF CUSTODY
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Burlingame, CA: 111 Anza Blvd., Suite 122, Burlingame, CA 94010 * (833) 465-5857

Table with 6 columns: Weather, Fog, Rain, Snow, Wind, Clear. Includes a Level section with options: None, Light, Moderate, Heavy.

Table with 2 columns: EMLab ID, 4242277

REQUESTED SERVICES (Use checkboxes below)
Asbestos PLM
Grid of checkboxes for various services.

CONTACT INFORMATION
PROJECT INFORMATION
TURN AROUND TIME CODES (TAT)
Table with 7 columns: Sample ID, Description, Sample Type, TAT, Volume / Area, ISO Class, Notes. Includes a large table for sample details.

SAMPLE TYPE CODES
RELINQUISHED BY
DATE & TIME
RECEIVED BY
DATE & TIME
Table for sample tracking and signatures.

CHAIN OF CUSTODY
www.eurofinsus.com/Built

New Jersey: 3000 Lincoln Drive East, Suite A, Marlton, NJ 08053 * (866) 871-1984
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Burlingame, CA: 111 Anza Blvd., Suite 122, Burlingame, CA 94010 * (833) 465-5857

Table with 6 columns: Weather, Fog, Rain, Snow, Wind, Clear. Includes a Level column with options: None, Light, Moderate, Heavy.

Table with 2 columns: EMLab ID, 4242277

REQUESTED SERVICES (Use checkboxes below)
Asbestos PLM
Grid of checkboxes for requested services.

CONTACT INFORMATION
PROJECT INFORMATION
TURN AROUND TIME CODES (TAT)
Table with 7 columns: Sample ID, Description, Sample Type, TAT, Volume / Area, ISO Class, Notes. Includes a large text block for TAT codes and a detailed sample log table.

SAMPLE TYPE CODES
RELINQUISHED BY
DATE & TIME
RECEIVED BY
DATE & TIME
Table for sample tracking and signatures.

CHAIN OF CUSTODY
www.eurofinsus.com/Built

New Jersey: 3000 Lincoln Drive East, Suite A, Marlton, NJ 08053 * (866) 871-1984
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Table with 6 columns: Weather, Fog, Rain, Snow, Wind, Clear. Includes a Level section with options: None, Light, Moderate, Heavy.

Table with 1 column: EMLab ID. Value: 4242277

REQUESTED SERVICES
(Use checkboxes below)

Table for Asbestos PLM with 10 columns and 10 rows of checkboxes.

CONTACT INFORMATION
Company: Environmental Works (30602) Address: 1455 E. Chestnut Expy Springfield, MO 65802
Contact: Andrew Barchak, Nicole Wise, Nick Godfrey Special Instructions:
Phone: 816-285-8433

PROJECT INFORMATION
Project ID: 252049.01
Project Description: Asbestos Inspection - 6347 Plymouth Ave, St. Louis, MO 63133
Project Zip Code: 63133 Sampling Date & Time: 09/23/2025 07:00 AM
PO Number: 252049.01 Sampled By: Andrew Barchak

TURN AROUND TIME CODES (TAT)
STD - Standard (DEFAULT)
ND - Next Business Day
SD - Same Business Day Rush
WH - Weekend / Holiday
Rushes received after 2pm or on weekends, will be considered received the next business day. Please alert us in advance of weekend analysis needs.

Sample ID Description Sample Type TAT Volume / Area ISO Class Notes
28-2 Grey Splotch Floor Tile + Black Mastic (3rd) B STD N/A
29-1 Brown Floor Tile + Yellow Mastic (3rd) B STD N/A
29-2 Brown Floor Tile + Yellow Mastic (3rd) B STD N/A
30-1 Grey Stair Tiles + Mastic (3rd) B STD N/A
30-2 Grey Stair Tiles + Mastic (3rd) B STD N/A
31-1 ACT (4) (3rd Offices) B STD N/A
31-2 ACT (4) (3rd Offices) B STD N/A
32-1 Drywall Composite (Tape/Joint/Drywall) - White (3) B STD N/A
32-2 Drywall Composite (Tape/Joint/Drywall) - White (3) B STD N/A
33-1 White Cove Base + Mastic B STD N/A
34-1 Yellow Checkered Floor Tile + Mastic B STD N/A

Table with 5 columns: SAMPLE TYPE CODES, RELINQUISHED BY, DATE & TIME, RECEIVED BY, DATE & TIME. Includes signature of Sheri McGraw, Laboratory Manager.

CHAIN OF CUSTODY
www.eurofinsus.com/Built

New Jersey: 3000 Lincoln Drive East, Suite A, Marlton, NJ 08053 * (866) 871-1984
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Burlingame, CA: 111 Anza Blvd., Suite 122, Burlingame, CA 94010 * (833) 465-5857

Table with 6 columns: Weather, Fog, Rain, Snow, Wind, Clear. Includes a Level section with options: None, Light, Moderate, Heavy.

Table with 2 columns: EMLab ID, 4242277

REQUESTED SERVICES (Use checkboxes below)
Asbestos PLM
Grid of checkboxes for requested services.

CONTACT INFORMATION
PROJECT INFORMATION
TURN AROUND TIME CODES (TAT)
Table with 7 columns: Sample ID, Description, Sample Type, TAT, Volume / Area, ISO Class, Notes. Includes a section for Asbestos PLM.

SAMPLE TYPE CODES
RELINQUISHED BY
DATE & TIME
RECEIVED BY
DATE & TIME
Table with 5 columns for tracking sample types and signatures.

CHAIN OF CUSTODY
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Table with 6 columns: Weather, Fog, Rain, Snow, Wind, Clear. Includes a Level section with options: None, Light, Moderate, Heavy.

Table with 1 column: EMLab ID. Value: 4242277

REQUESTED SERVICES (Use checkboxes below)
Asbestos PLM
Grid of checkboxes for service selection.

CONTACT INFORMATION
PROJECT INFORMATION
TURN AROUND TIME CODES (TAT)
Table with columns: Sample ID, Description, Sample Type, TAT, Volume / Area, ISO Class, Notes.

SAMPLE TYPE CODES
RELINQUISHED BY
DATE & TIME
RECEIVED BY
DATE & TIME
Signature: Sheri McGraw, Laboratory Manager

APPENDIX D

XRF Performance Characteristic Sheet

Performance Characteristic Sheet

EFFECTIVE DATE: February 1, 2022

MANUFACTURER AND MODEL:

Make: **SciAps**
 Models: **Model X-550**
 X-Ray Source: **Rhodium (Rh) or Gold (Au) Anode**

FIELD OPERATION GUIDANCE

ACTION LEVEL SETTING IN THE INSTRUMENT: 1.0 mg/cm²

NOTE: This PCS is not applicable at other Action Level settings; the Action Level setting of the instrument must be 1.0 mg/cm² to use this PCS.

OPERATING PARAMETERS:

Timed mode: fixed 10-second reading.

Quick mode: variable-time reading (approximately 2-6 seconds).

XRF CALIBRATION CHECK LIMITS:

0.8 to 1.2 mg/cm² (inclusive) on NIST SRM 2579 (1.02 mg/cm²)/NIST SRM 2573, or equivalent

SUBSTRATE CORRECTION:

Not applicable

INCONCLUSIVE RANGE OR THRESHOLD:

Rh Anode (Timed or Quick) READING DESCRIPTION	SUBSTRATE	THRESHOLD (mg/cm ²)
Results not corrected for substrate bias on any substrate	Brick	0.5
	Concrete	0.5
	Drywall	0.5
	Metal	0.5
	Plaster	0.5
	Wood	0.5
Au Anode (Timed or Quick) READING DESCRIPTION	SUBSTRATE	INCONCLUSIVE RANGE (mg/cm ²)
Results not corrected for substrate bias on any substrate	Brick	(0.4-0.6)
	Concrete	(0.4-0.6)
	Drywall	(0.4-0.6)
	Metal	(0.4-0.6)
	Plaster	(0.4-0.6)
	Wood	(0.4-0.6)

BACKGROUND INFORMATION

EVALUATION DATA SOURCE AND DATE:

This sheet is supplemental information to be used in conjunction with Chapter 7 of the HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*, 2012 Edition ("HUD Guidelines"). Performance parameters shown on this sheet are calculated using test results on building components in the HUD archive. Testing was conducted on 146 test samples in February 2022, with two separate instruments of each Anode type, operated in both Timed and Quick modes.

OPERATING PARAMETERS

Performance parameters shown in this sheet are applicable only when properly operating the instrument using the manufacturer's instructions and procedures described in Chapter 7 of the HUD Guidelines.

XRF CALIBRATION CHECK:

The calibration of the XRF instrument should be checked using the paint film nearest 1.0 mg/cm² in the NIST Standard Reference Material (SRM) used (e.g., for NIST SRM 2579, use the 1.02 mg/cm² film; for NIST SRM 2579a, use film 2573 (1.04 mg/cm²)).

If the average (rounded to 1 decimal place) of three readings is outside the acceptable calibration check range, follow the manufacturer's instructions to bring the instrument into control before XRF testing proceeds.

EVALUATING THE QUALITY OF XRF TESTING:

Randomly select ten testing combinations for retesting from each house or from two randomly selected units in multifamily housing.

Conduct XRF re-testing at the ten testing combinations selected for retesting.

Determine if the XRF testing in the units or house passed or failed the test by applying the steps below. Compute the Retest Tolerance Limit by the following steps:

Determine XRF results for the original and retest XRF readings. In single-family and multifamily housing, a result is defined as a single reading. Therefore, there will be ten original and ten retest XRF results for each house or for the two selected units.

Calculate the average of the original XRF result and the retest XRF result for each testing combination.

Square the average for each testing combination.

Add the ten squared averages together. Call this quantity C.

Multiply the number C by 0.0072. Call this quantity D.

Add the number 0.032 to D. Call this quantity E.

Take the square root of E. Call this quantity F.

Multiply F by 1.645. The result is the Retest Tolerance Limit.

Compute the average of all ten original XRF readings.

Compute the average of all ten re-test XRF readings.

Find the absolute difference of the two averages.

If the difference is less than the Retest Tolerance Limit, the inspection has passed the retest. If the difference of the overall averages equals or exceeds the Retest Tolerance Limit, this

procedure should be repeated with ten new testing combinations. If the difference of the overall averages is equal to or greater than the Retest Tolerance Limit a second time, then the inspection should be considered deficient.

Use of this procedure is estimated to produce a spurious result approximately 1% of the time. That is, results of this procedure will call for further examination when no examination is warranted in approximately 1 out of 100 dwelling units tested.

TESTING TIMES:

The reading time in Archive tests was 10 seconds in Timed mode and from 2-6 seconds in Quick mode, for both the Rh Anode and Au Anode.

CLASSIFICATION OF RESULTS:

XRF results for the Rh Anode in Timed or Quick mode are classified as **positive** if they are **greater than or equal** to 0.5 mg/cm² and **negative** if they are **less than** 0.5 mg/cm².

XRF results for the Au Anode in Timed or Quick mode are classified as **positive** if they are **greater than or equal** to 0.6 mg/cm², **negative** if they are **less than or equal** to 0.4 mg/cm² and **inconclusive** if they are **greater** than 0.4 mg/cm² **AND less than** 0.6 mg/cm².

DOCUMENTATION:

A report titled *Methodology for XRF Performance Characteristic Sheets* (EPA 747-R-95-008) provides an explanation of the statistical methodology used to develop Performance Characteristic Sheets at the Federal standard (Action Level) of 1.0 mg/cm² and provides empirical results from using the recommended inconclusive ranges or thresholds for specific XRF instruments. The report may be downloaded at <http://www2.epa.gov/lead/methodology-xrf-performance-characteristic-sheets-epa-747-r-95-008-september-1997>. The methodology was subsequently generalized by QuanTech for application to other Action Levels.

APPENDIX E

Interpretation of XRF Field Data

INTERPRETATION OF XRF FIELD DATA

PAINT CONDITIONS

During the inspection, the paint is categorized as being in one of three conditions: Intact, Fair or Poor. The categorization of paint condition is based on total area of deteriorated paint on each component pursuant to the HUD chart below:

Type Of Building Component	Intact	Fair	Poor/Defective
Large Exterior Surfaces	Entire Surface is intact	Less than or equal to 10 sq/ft	More than 10 sq/ft
Interior Components of large surfaces: ceiling walls, doors, ceilings	Entire Surface is intact	Less than or equal to 2 sq/ft	More than 2 sq/ft
Interior & Exterior small surface areas: windows sills, baseboards, etc	Entire Surface is intact	Less than or equal to 10% of total surface areas	More than 10% of total surface area

Intact - Intact is defined as paint, which is not flaking, peeling or chalking (i.e. you cannot lift the paint from the substrate with your fingernail). Components coated with intact LBP do not pose a lead hazard to the occupants. However, since conditions can change over time, the owner should inspect the lead positive components periodically for indications of damage. Moreover, the owner should possess an Operations & Maintenance Plan describing safe ways reducing the likelihood of developing lead hazards.

Fair - Fair surfaces should be repaired but are not yet considered a lead hazard.

Poor/Defective Surface - LBP in poor condition (i.e. flaking or peeling) poses a lead hazard and should be corrected. Poor paint will continue to erode, increasing the likelihood of lead dust or paint chips falling to the ground. At a minimum, poor surfaces should be stabilized via wet scraping or sanding and then repainted. We recommend that the owner retain a Department of Health Services certified lead abatement worker or contractor supervisor to perform the wet sanding or scraping.

BUILDING DESCRIPTIONS

Each side of the building is assigned a letter (Side 'A', Side 'B', Side 'C', and Side 'D'). The side of the building where the front entrance is located is designated Side 'A'. The three remaining sides of the building are labeled clockwise as follows: standing inside the building, with back to the front entrance (the 'A' side), the side on the left is 'B', the rear side is 'C', and the side to the right is 'D'. For exterior surfaces, when facing the front entrance of the building, the front entrance side is 'A', and, proceeding clockwise, the left side is 'B', the rear side is 'C', and the right side is 'D'.

Within the building, the sides of each room are assigned letters in the same way as the interior as a whole. That is, when standing in any interior room, with the front entrance of the building behind where one is standing, the side which is parallel to the front entrance is designated side 'A', and, again proceeding clockwise, the side on the left is 'B', the side one is facing (parallel to the rear side of the building) is 'C', and the right side is 'D'.

ROOM DESIGNATIONS

Each room is assigned a number. The number assigned each room is provided on Figures and is indicated as the room on the LBP Survey Record Sheet.

SUBSTRATE

The material to which a coating such as paint is applied. Residential substrates are usually wood, plaster, masonry, gypsum board, or metal, including components such as doors and door frames, windows and window trim, other trim, walls, ceilings, cabinets, and other built-in storage.

SURFACE

The outer or topmost boundary of a substrate.

"LEAD SPEAK" – A BRIEF GLOSSARY

Lead-Based Paint: Paint or other surface coatings that contain lead equal to or exceeding 1.0 milligram per square centimeter or 0.5 percent by weight or 5,000 parts per million (ppm) by weight.

Lead-Containing Paint – Paint or other surface coatings that contain lead greater than 0.0 mg/cm² of lead, but less than 1.0 mg/cm² of lead, as determined by XRF.

Lead-Based Paint Hazards: Any condition that causes exposure to lead from dust-lead hazards, soil-lead hazards, or lead-based paint that is deteriorated or present in chewable surfaces, friction surfaces, or impact surfaces, and that would result in adverse human health effects.

Visual Assessment: A visual inspection of interior and exterior surfaces to identify specific conditions that may be lead-based paint hazards. A visual inspection does not identify lead-based paint. The assessment may be performed by a person trained in visual assessment. Training for visual assessment is available on HUD's website at www.hud.gov/offices/lead.

LEAD HAZARD EVALUATION

Paint Testing: Testing of specific surfaces, by XRF (x-ray fluorescence) or lab analysis, to determine the lead content of these surfaces, performed by a federal or state-certified lead-based paint inspector or risk assessor.

Lead-Based Paint Inspection: A surface-by-surface investigation to determine the presence of lead-based paint and the provision of a report explaining the results of the investigation. It is performed by a certified paint inspector or risk assessor.

Risk Assessment: A comprehensive evaluation for lead-based paint hazards that includes paint testing, dust and soil sampling, and a visual evaluation. The risk assessment report identifies lead hazards and appropriate lead hazard reduction methods. A certified risk assessor must conduct the assessment.

Lead Hazard Screen: A limited risk assessment activity that can be performed instead of a risk assessment in units that meet certain criteria (e.g. good condition). The screen must be performed by a certified risk assessor. If the unit fails the lead hazard screen, a full risk assessment must be performed.

Clearance Examination: Clearance is performed after hazard reduction, rehabilitation or maintenance activities to determine if a unit is safe for occupancy. It involves a visual assessment, analysis of dust samples, and preparation of report. The certified risk assessor, paint inspector, or lead sampling technician (called a clearance technician in the HUD regulation) performing clearance must be independent from the entity/individual conducting paint stabilization or hazard reduction.

LEAD HAZARD REDUCTION

Paint Stabilization: An interim control method that stabilizes painted surfaces and addressed the underlying cause of deterioration. Steps include repairing defective surfaces, removing loose paint and applying new paint.

Interim Controls: Set of measures to temporarily control lead-based paint hazards. Interim control methods must be completed by qualified workers using safe work practices. Follow-up monitoring is needed.

Standard Treatments: A complete set of interim control methods that when used together temporarily control all potential lead hazards in a unit. Because they address all conditions, a risk assessment or other evaluation is not needed. Standard treatments must be completed by qualified workers using safe work practices. As with interim controls, follow-up monitoring is needed.

Abatement: Measures to permanently control (i.e., 20 years or more) lead-based paint or lead-based paint hazards. EPA regulations exclude from the definition of abatement "renovation, remodeling, landscaping or other activities, when such activities are not designed to permanently eliminate lead-based paint hazards, but instead are designed to repair, restore, or remodel a given structure or dwelling, even though these activities may incidentally result in a reduction or elimination of lead-based paint hazards." [40 CFR 745.223]

Action Level: Employee exposure, without regard to the use of respirators, to an airborne concentration of lead in micrograms per cubic meter of air (µg/m³) calculated as an eight hour time-weighted average (TWA). The action level for lead is 30 µg/m³.

Permissible Exposure Limit: Employee exposure, the maximum exposure level to an airborne concentration of lead in micrograms per cubic meter of air (µg/m³) calculated as an eight hour time-weighted average (TWA). The PEL for lead is 50 µg/m³.

LEAD POISONING

Environmental Intervention Blood Lead Level: The level of lead in blood that requires intervention in a child under age six. This is defined as a blood lead level of 20 µg/dL (micrograms per deciliter) of whole blood or above for a single test, or blood lead levels of 15-19 µg/dL in two tests taken at least three months apart.

Lead: The word "lead" when used in these projects means elemental lead, all inorganic lead compounds and a class of organic lead compounds called lead soaps. Lead is a heavy metal at room temperature and pressure and is a basic chemical element. It can combine with various other substances to form lead compounds.

KEY UNITS OF MEASUREMENT

µg (Microgram): A microgram is 1/1000th of a milligram (or one millionth of a gram).

*To put this unit into perspective, a penny weighs 2 grams. To get a microgram, you would need to divide the penny into 2 million pieces. A microgram is one of those two million pieces.

ft² (Square foot): One square foot is equal to an area that has a length of one foot (12 inches) and a width of one foot (12 inches).

µg/dL: Micrograms per deciliter used to measure the level of lead in children's blood to establish whether intervention is needed. A deciliter (1/10th of liter) is a little less than half a cup.

*As noted above, a microgram is the same weight as one penny divided into two million parts.

µg/gram: Micrograms per gram of sample, equivalent to parts per million (ppm) by weight.
Used to measure lead in soil.

µg/ft²: Micrograms per square feet is the measurement used to measure levels of lead in dust samples.
The clearance report should have the dust sampling results listed in µg/ft² (micrograms per square foot).

mg/cm²: Milligrams per square centimeter. Used to measure lead in paint.

percent: Percent by weight, used usually for lead-based paint (1 percent = 10,000 µg/gram)

ppm: Parts per million by weight, equivalent to µg/gram (10,000 ppm = 1 percent).
Used to measure lead in paint and soil.

LEAD-BASED PAINT STANDARDS

Paint – Definition of Lead-Based Paint

Paint coating that contains at least:

- 1 mg/cm² of lead (HUD);
- 0.5 percent lead; or 5,000 parts per million lead by dry weight.

Paint – Definition of Lead-Containing Paint

Paint coating that contains at least:

- Any amount above 0.0 mg/cm² of lead (OSHA);

* In 1978 the Consumer Product Safety Commission banned the residential use of lead-based paint that contained greater than or equal to 0.06 percent or 600 ppm of lead.

Dust – Federal Thresholds for Lead-Contamination (Risk Assessment/Clearance)

➤ Floors	40 µg/ft ²
➤ Interior window sills	250 µg/ft ²
➤ Window troughs (Clearance only)	400 µg/ft ²

Soil – Federal Thresholds for Bare Soil Contamination

➤ Play areas used by children under age 6	400 µg/gram
➤ Other areas, if more than 9ft ² in total area of bare soil per property	2,000 µg/gram
➤ Abatement required by HUD	5,000 µg/gram

LIST OF ACRONYMS

AIHA:	American Industrial Hygiene Association
AL:	Action Level
ANSI:	American National Standards Institute
ASA:	American Standards Association
ASTM:	American Society for Testing & Materials
CFR:	Code of Federal Regulations
CERCLA:	Comprehensive Environmental Response, Compensation & Liability Act (42 USC 9601ff)
CIH:	Certified Industrial Hygienist
DOT:	U.S. Department of Transportation
EPA:	U.S. Environmental Protection Agency
FR:	Federal Register
GFCI:	Ground Fault Circuit Interrupter
GISO:	General Industry Safety Orders
HEPA:	High Efficiency Particulate Air (filter with 99.97% efficiency to 0.3 microns)
HVAC:	Heating, ventilation and air conditioning system
HUD:	U.S. Department of Housing and Urban Development
IH:	Industrial Hygienist
LBP:	Lead-Based Paint
LCP:	Lead-Containing Paint
OSHA:	Occupational Safety and Health Administration
PEL:	Permissible Exposure Limit
NAM:	Negative Air (Filtration) Machine
NEA:	Negative Exposure Assessment
NEC:	National Electrical Code
NESHAPS:	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61 M)
NFPA:	National Fire Protection Association
NIOSH:	National Institute of Occupational Safety and Health
PAPR:	Powered Air-Purifying Respirator
PEL:	Permissible Exposure Limit
RCRA:	Resource Conservation and Recovery Act
SDS:	Safety Data Sheet
TWA:	Time Weighted Average
XRF:	X-ray Fluorescence

Exhibit C - Owner-Furnished Building Drawing and Detail Index

LCRA will identify and furnish available existing building drawings and details applicable to the remediation Work as part of Exhibit C or by addendum prior to the bid due date.