

Ohio EPA RCRA AND VAP MOA Track: Phase II Property Assessment

| Required Information Component of Phase II Property Assessment | Yes or No (choose one) | Provide response below. Please reference the location [including document name, section and page number(s)] within the Phase II documentation where this information or evaluation is located and also answer any specific questions as indicated. |
|--|-----------------------------|--|
| <p>1. <u>OAC 3745-300-07(E)(1) - Data from prior Phase II Assessments</u></p> <p>1.a. Are data from prior Phase II assessments being used?</p> | <p>Yes: ___ No: ___</p> | |
| <p>1.b. If prior Phase II data are used, please answer the following:</p> | | |
| <p>i. Was the Phase II conducted prior to December 16, 1996?</p> | <p>Yes: ___ No: ___</p> | |
| <p>ii. Is the information gathered and methods used to collect all data consistent with OAC 3745-300-07?</p> <p>If NO, please provide the location of an explanation detailing why this information is considered appropriate for conducting a Phase II Assessment in accordance with OAC 3745-300-07.</p> | <p>Yes: ___ No: ___</p> | <p>Section: Page Number:</p> |
| <p>iii. Were data confirmed by collecting a minimum of 10 % of the samples collected in that identified area, or at least three samples within the identified area (whichever is greater), and analyzing all samples using a certified lab in accordance with OAC 3745-300-07(E)(1)(d)(iii)?</p> <p>If NO, please provide the location of an explanation detailing why this information is considered appropriate for conducting a VAP Phase II Assessment.</p> | <p>Yes: ___ No: ___</p> | <p>Section: Page Number:</p> |
| <p>2. <u>OAC 3745-300-07(E)(3) and (4) - IDENTIFIED AREAS</u></p> | | |
| <p>2.a. Were all potential identified areas evaluated in the VAP Phase II?</p> <p>If Yes, provide a description or narrative of each identified area and provide the rationale for eliminating any areas identified in the Phase I Property Assessment from the Phase II Property Assessment.</p> <p>If No, provide the location of the rationale for not evaluating an identified area.</p> | <p>Yes: ___ No: ___</p> | <p>Section: Page Number:</p> |
| <p>2.b. How many identified areas from the Phase I were evaluated in the Phase II property assessment?</p> | | <p>Number of Identified Areas evaluated:</p> |

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|--|------------------------|--|
| <p>2.c. Provide a map in the Phase II documentation which indicates the locations of the identified areas on the property that were evaluated in the VAP Phase II.</p> | | <p>Section: Page Number:</p> |
| <p>2.d. Provide a list of what media in the identified areas were evaluated. (<i>List all that apply: soils, sediment, surface water, ground water, etc.</i>) Reference the location of the list.</p> <p>NOTE: <i>The table of identified areas from Phase I should be amended if additional identified areas were discovered or eliminated during Phase II activities. Please amend the Identified Area table as necessary and update the identified area map.</i></p> | | <p>Section: Page Number:</p> |
| <p>2.e. Provide a list that indicates what Chemical(s) of Concern (COCs) were evaluated within the identified area(s)? (<i>i.e. include lab analyses that were performed.</i>)</p> | | <p>Section: Page Number:</p> |
| <p>2.f. Provide a list that indicates for each identified area, any source areas that are present. Reference the location of the list.</p> | | <p>Section: Page Number:</p> |
| <p>3. <u>OAC 3745-300-07(E)(6)(a) and OAC 3745-300-07(F)(1)(a)(i)-(iii) - Pathways</u></p> | | |
| <p>Review Table 1: Potential Human Exposure Pathways and Table 2: Potential Ecological Exposure Pathways contained in OAC 3745-300-07 and provide a table listing all the existing and potential exposure pathways evaluated for this voluntary action. Demonstrate if each pathway is complete or incomplete as described below.</p> | | <p>Location of Table: Section: Page Number:</p> |
| <p>The above-mentioned Exposure Pathways Table must also contain the following information (for each exposure pathway identified):</p> <ul style="list-style-type: none"> * All receptor populations on the property; * All receptor populations off the property that are reasonably anticipated to be exposed to COCs emanating from the property; and * All important ecological resources on or adjacent to the property. * All important ecological resources that would have reasonably been associated with the property or adjacent properties were it not for the presence of COCs on or emanating from the property. <p><i>Note: An example of a table which can be used for this</i></p> | | |

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|---|------------------------|---|
| <i>requirement is attached. This table may also be used to summarize the applicable standards for each COC exposure pathway.</i> | | |
| 4. OAC 3745-300-07(F)(5)(c) - Evaluation of Soil | | |
| 4.a. Was soil determined to be an affected medium in any identified area(s)? | Yes: ____ No: ____ | Section: _____ Page Number: _____ |
| 4.b. If the answer to 4a is YES, was the collected soil data analyzed by a Certified Laboratory? | Yes: ____ No: ____ | Section: _____ Page Number: _____ |
| 4.c. How were the concentrations of COCs in identified areas determined? | | <p>Choose all of the following that apply:</p> <p>_____ Derived by calculating the 95% UCL of the arithmetic mean for each data set in accordance with OAC 3745-300-07(F)(5)(c)(i). Section: _____ Page Number: _____</p> <p>_____ Derived by the maximum concentration within the identified area in accordance with OAC 3745-300-07(F)(5)(c)(ii). Section: _____ Page Number: _____</p> <p>_____ Derived by incremental sampling in accordance with OAC 3745-300-07(F)(5)(c)(iii). Section: _____ Page Number: _____</p> |
| 4.d. What land use category will be used to evaluate compliance with direct contact soil standards? (<i>i.e. industrial, commercial, residential....</i>) <i>[Note: If the property land use is to be limited to commercial or industrial use, a use restriction must be recorded in the deed records of the county recorder's office.]</i> | | <p>Check One (or more if applicable):</p> <p><input type="checkbox"/> An appropriate land use category will be determined during the property-specific risk assessment</p> <p><input type="checkbox"/> Residential Land Use Category</p> <p><input type="checkbox"/> Commercial Land Use Category</p> <p><input type="checkbox"/> Industrial Land Use Category</p> <p><input type="checkbox"/> Other (please explain) :</p> |
| 4.e. What will be the direct contact point of compliance? Note: If there are multiple points of compliance, provide an attachment to this section indicating <u>all</u> points of compliance for the property. | | <p><input type="checkbox"/> Direct Contact Point of Compliance = _____ ft.</p> <p><input type="checkbox"/> An appropriate direct contact point of compliance will be evaluated during the property-specific risk assessment</p> <p><input type="checkbox"/> Multiple points of compliance, see attached (<i>if applicable</i>)</p> |
| 5. OAC 3745-300-07(F)(5)(d)(i-ii) - Ground Water Evaluation | | |

Ohio EPA RCRA AND VAP MOA Track: Phase II Property Assessment

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|---|---------------------------|--|
| 5.a. Is ground water an affected medium in any identified area? If yes , go to Form #14 to complete the Phase II-Ground Water questions before continuing this form. If no , proceed with Question 6 to continue this form. | Yes: ___ No: ___ | |
| 6. <u>OAC 3745-300-07(F)(9)</u> - Sources or Source Areas which may impact ground water. If you have sources or source areas which may impact ground water, go to Form #14 before continuing with this form. | | |
| 7. <u>OAC 3745-300-07(F)(5)(a)</u> - Surface Water Evaluation | | |
| 7.a. Are surface waters located on or adjacent to the property? Indicate where in the Phase II documentation it is referenced. | Yes: ___ No: ___ | Section: Page Number: |
| 7.b. If the answer to question 7a. is yes, were Surface Water samples collected and analyzed in accordance with <u>both</u> : -Ohio EPA, "Biological Criteria For The Protection of Aquatic Life: Volume II: Users Manual For Biological Field Assessment of Ohio Surface Waters", Oct. 30, 1987, Updated January 1, 1988, Amended Sept., 30, 1989 AND -Section 3.3 of the "Manual of Ohio EPA Surveillance Methods and Quality Assurance Practices" Oct. 1, 1988, Revised Dec. 1991? | Yes: ___ No: ___ | Section: Page Number: |
| 7.c. Is the pathway to a surface water receptor complete? | Yes: ___ No: ___ | |
| 8. <u>OAC 3745-300-07(F)(5)(b)</u> - Sediments | | |
| 8.a. Are there sediments located on or adjacent to the voluntary action property? If yes , go to question 8b . If no , proceed to question #9 . | Yes: ___ No: ___ | Section: Page Number: |
| 8.b. Are chemicals of concern emanating or migrating from the voluntary action property to surface waters and hence the sediments on or adjacent to the voluntary action property? Indicate where it is referenced. | Yes: ___ No: ___ | Section: Page Number: |
| 8.c. Have the sediments been sampled and analyzed for potential chemical(s) of concern? (See OAC 3745-300-09(F)(1) for further clarification) If yes, provide the list of the COCs that have been analyzed. | Yes: ___ No: ___ | Section: Page Number: |
| 9. <u>OAC 3745-300-07(G)</u> - Use of Modeling | | |
| 9.a. Was a model used to describe the saturated or unsaturated zones? Note: Models for ground water and demonstrating protection of ground water meeting unrestricted potable use standards | Yes: ___ No: ___ | |

Ohio EPA RCRA AND VAP MOA Track: Phase II Property Assessment

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|--|------------------------|--|
| (POGWMUPUS) are described and reported in Form 14. Proceed using this section for models used for any media other than ground water. | | |
| 9.b. Was a model used to describe the concentrations of chemicals of concern? | Yes: ___ No: ___ | Section: _____ Page Number: _____ |
| 9.c. If the answer to 9b. is yes, what model(s) was used? | | Name of model(s) used: _____ |
| 9.d. If modeling was used, questions 9e.through 9k.must be answered. If modeling was not used, please proceed to Question 10. | | |
| 9.e. Was the model peer reviewed as required in OAC 3745-300-07(G)(2)(a)? Please provide the location within the Phase II documentation where this is addressed. | Yes: ___ No: ___ | Section: _____ Page Number: _____ |
| 9.f. Provide the location in the Phase II documentation of how the model was verified. | | Section: _____ Page Number: _____ |
| 9.g. Provide the location in the Phase II documentation of how the model was field validated. | | Section: _____ Page Number: _____ |
| 9.h. Were conditions consistent throughout the modeled area? | Yes: ___ No: ___ | |
| 9.i. Was the model used consistent with the information contained in the Phase II documentation? | Yes: ___ No: ___ | |
| 9.j. Was the model calibrated to geologic, hydrogeologic and physical conditions throughout the modeled area? | Yes: ___ No: ___ | |
| 9.k. Indicate the location in the Phase II documentation of an explanation of how the assumptions used in the model (including any statistical methods used) were verified. | | Section: _____ Page Number: _____ |
| 10. OAC 3745-300-07(H) - Background | | |
| 10.a. Was a comparison to background made at the property for any medium in the identified area? | Yes: ___ No: ___ | Section: _____ Page Number: _____ |
| 10.b. In what medium (media) were background samples taken? | | Identify the media: ___ Soils ___ Ground Water Section: _____ Page Number: _____ |
| 11. OAC 3745-300-07 (H)(1)(a) - Background Levels in Soils | | |

Ohio EPA RCRA AND VAP MOA Track: Phase II Property Assessment

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|---|------------------------|--|
| 11.a. If background sampling was conducted for soils, answer all the questions in this section. If background sampling for soils was not conducted, please proceed to Question 12. | | |
| 11.b. Reference the location in the Phase II documentation of the background sampling information. | | Section: Page Number: |
| 11.c. Were background samples taken in fill areas? | Yes: ___ No: ___ | |
| 11.d. Were background samples taken in areas where management, treatment, handling, storage or disposal activities of any of the following are known or suspected to have occurred: hazardous substances, petroleum, solid waste, hazardous waste, or waste waters? | Yes: ___ No: ___ | |
| 11.e. Were background samples taken in any material handling areas? | Yes: ___ No: ___ | |
| 11.f. Were background samples taken within three feet of a roadway? | Yes: ___ No: ___ | |
| 11.g. Were background samples taken on a parking lot or in areas surrounding a parking lot? | Yes: ___ No: ___ | |
| 11.h. Were background samples on railroad tracks, railway areas or areas affected by runoff from a railway? | Yes: ___ No: ___ | |
| 11.i. Were background samples taken in areas of concentrated air pollution deposition or areas affected by their runoff? | Yes: ___ No: ___ | |
| 11.j. Were background samples taken in storm drains or ditches presently or historically receiving industrial or urban runoff? | Yes: ___ No: ___ | |
| 11.k. Were background samples taken in any spill areas? | Yes: ___ No: ___ | |
| 11.l. Were background samples taken at the same soil depth interval or zone as those samples to which they will be compared? (See OAC 3745-300-07(H)(1)(a) for more information) | Yes: ___ No: ___ | |
| 11.m. Were at least eight background samples collected as required under OAC 3745-300-07? | Yes: ___ No: ___ | |
| 11.n. Please provide the location of the calculation sheets which describe how the numerical value for background concentrations for COCs in soils at the property were determined. | | Section: Page Number: |
| 12. OAC 3745-300-07(H)(3) - Background Levels in Ground | | |

Ohio EPA RCRA AND VAP MOA Track: Phase II Property Assessment

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|--|------------------------|--|
| Water | | |
| 12.a. Were ground water background samples taken? If yes, answer the following questions in this section. If no, proceed to Question 13. | Yes: ___ No: ___ | |
| 12.b. Where were ground water samples taken? <i>Reference description of the sample locations or location of a map containing sample locations.</i> | | Section: Page Number: |
| 12.c. Please indicate the relative location of the background sampling. | | Circle one: Upgradient Downgradient Sidegradient Crossgradient |
| 12.d. Were procedures used to control or correct for seasonal and spatial variability? If yes, provide location where procedures are described in the Phase II documentation. | Yes: ___ No: ___ | Section: Page Number: |
| 12.e. If a statistical method was used, provide location, in Phase II documentation, where method is described. | | Section: Page Number: |
| 12.f. If a statistical method was used, provide location, in the Phase II documentation, where it is described if the data were normally distributed or, if the data were not normally distributed and what data transformations were performed. | | Section: Page Number: |
| 12.g. Does the result of the statistical analysis comply with the performance standards set in: <u>U.S. EPA Statistical Analysis of Ground Water Monitoring data at RCRA Facilities, Interim Final Guidance, April 1989</u> or <u>U.S. EPA Addendum to the Interim Final Guidance for Statistical Analysis of Ground Water Monitoring at RCRA Facilities, April 1992</u> ? | Yes: ___ No: ___ | |
| 12.h. Was an off-property investigation used to determine background level? If yes, provide location, in the Phase II documentation, where it is explained why an off-property investigation was performed in lieu of an on-property investigation. | Yes: ___ No: ___ | Section: Page Number: |
| 12.i. If off-property investigations were used to determine background levels, provide location, in the Phase II documentation, of the description of the off-property investigation, including an explanation of why it was not possible to find appropriate on-property sampling locations to determine background. | | Section: Page Number: |
| 13. Conclusions and Need for PSRA or Remedial Activities | | |
| 13.a. Do concentrations of COCs detected in any media exist in | Yes: ___ | |

Ohio EPA RCRA AND VAP MOA Track: Phase II Property Assessment

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|---|--------------------------------|--|
| any identified area? | _No: ____ | |
| 13.b. Are exposure pathway(s) originating from COCs in an identified area complete to a receptor or a point of compliance? | Yes: ____ _No: ____ ____ | |
| <p>13.c. Can and are all existing or reasonably anticipated complete exposure pathways being evaluated using only generic numerical standards from rule 3745-300-08 of the OAC or background levels determined in accordance with rule 3745-300-07 of the OAC?</p> <p>If NO, go to Question 13d. A property-specific risk assessment is required; therefore, compliance with applicable standards and the need for remedial activities will be demonstrated using Form 15, which is completed during the Property-Specific Risk Assessment and Remedial Action Work Plan portion of the MOA-track.</p> <p>If YES, go to Question 14 to demonstrate compliance with applicable standards and the need for remedial activities. If ground water on the property exceeds UPUS, then Sub-section 7 of Form 14 must be completed. Answers to questions in Sub-section 7 of Form 14 verify that all ground water response requirements are addressed appropriately and provide guidance on when a property-specific risk assessment is needed, as well as guidance on the need for remedial activities.</p> | Yes: ____ _No: ____ | Section: Page Number: |
| <p>13d. A table of all existing or reasonably anticipated complete exposure pathways, all potential receptors, and a summary of the concentrations of COCs and whether the source of the COCs is located on or off-property for each identified area must be attached to this form. Proceed next to Question 15.</p> | | Section: Page Number: |
| <p>14. Demonstrating compliance with applicable standards or the need for remedial activities without a property-specific risk assessment.</p> | | |
| <p>14a. A table of all existing or reasonably anticipated complete exposure pathways for each identified area must be attached to this form. The table should also include (see Attachment 1):</p> <ul style="list-style-type: none"> • A summary of the identified areas and the media of concern within each identified area • A summary of the pathways, receptors and any applicable points of compliance; • A summary of the concentrations of COCs in each identified area; | | Document: Section: Page Number: |

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|---|------------------------|--|
| <ul style="list-style-type: none"> A summary of the applicable standards for each exposure pathway within each identified area; An indication of the method used to determine the applicable standard for each COC and the method of achieving compliance with applicable standards; and An indication of whether the applicable standard is met or if remedial activities are required to meet applicable standards. Note: If remedial activities (including, but not limited to, engineering and institutional controls) are required, Form 16 must be completed. | | |
| <p>14b. Were cumulative adjustments made to the applicable standards to achieve the risk goal(s), because multiple noncarcinogenic COCs and/or multiple carcinogenic COCs exist?</p> <p>If YES, provide the location where the calculation(s) used to conduct all the cumulative adjustments are contained in the documentation. (See <u>Demonstrating Compliance with Generic Standards</u> - Attachment I of the OEPA/VAP NFA Form - for clarification and guidance with respect to this question. Available at http://www.epa.state.oh.us/derr/derrmain.html).</p> <p>Note: Cumulative adjustments must be conducted when there are multiple COCs and/or multiple exposure pathways.</p> | Yes: ___ No: ___ | Document: Section: Page Number: |
| <p>14c. Does the property conform with the exposure assumptions used to calculate generic standards?</p> <p>Note: If answer to above is no, be aware that problems may exist regarding the applicable standards applied to the property.</p> | Yes: ___ No: ___ | Document: Section: Page Number: |
| <p>15. OAC 3745-300-07(E)(1)(b) - Phase I Updates</p> | | |
| <p>15.a. Were data from the Phase I Property Assessment used in the Phase II Property Assessment?</p> | Yes: ___ No: ___ | |
| <p>15.b. Has more than 180 days elapsed since the completion of a VAP Phase I?</p> <p>If YES, go to Question 15c.</p> <p>If NO, go to Question 16.</p> | Yes: ___ No: ___ | Date VAP Phase I Property Assessment completed: |
| <p>15.c. If more than 180 days have elapsed since the completion of a Phase I Property Assessment, has the VAP Phase I been amended as required?</p> | Yes: ___ No: ___ | Date VAP Phase I Property Assessment Amended completed: |
| <p>16. OAC 3745-300-07(E)(1)(c) - Data from Prior Phase I Assessments</p> | | |
| <p>16.a. If prior non-VAP Phase I information was used, provide</p> | | Document: |

Ohio EPA RCRA AND VAP MOA Track: Phase II Property Assessment

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| the location in the Phase II report of the non-VAP Phase I and answer the following: | | Section: Page Number: |
| (i) Was the prior non-VAP Phase I conducted prior to December 16, 1996? | Yes: ___ No: ___ | |
| (ii) Was the non-VAP information gathered and was the methodology used to collect and evaluate the data consistent with OAC 3745-300-06? | Yes: ___ No: ___ | |
| (iii) Was the non-VAP Phase I assessment amended to comply with OAC 3745-300-06? Note: An amendment to the Phase I must be performed when the Phase I was conducted more than 180 days prior to conducting the Phase II and if the Phase I did not meet all the requirements of OAC 3745-300-06. | Yes: ___ No: ___ | |
| 17. OAC 3745-300-07(J) - VAP Phase II Report Contents Required | | |
| 17.a. Does the Phase II report include: a legal description of the property; the dates over which the VAP Phase I and Phase II were conducted; the date that the written reports for the Phase I and Phase II were finalized and the name and job title of each person conducting the Phase II? | Yes: ___ No: ___ | |
| 17.b. Was a summary of any amendment to the Phase I provided in the Phase II report? | Yes: ___ No: ___ | |
| 17.c. Was a statement of any limitations or qualifications which impact the Phase II provided in the Phase II? | Yes: ___ No: ___ | |
| 17.d. Was a summary of all data collection activities conducted, provided in the Phase II report? | Yes: ___ No: ___ | |
| 17.e. Provide a brief summary of the rationale for all the sampling and testing activities conducted. | | Section: Page Number: |
| 17.f. Was a summary of the determinations and rationale made under OAC 3745-300-07(F)(1) to (F)(9) provided in the Phase II report? | Yes: ___ _No: ___ - | |
| 17.g. Was a summary of all sampling procedures utilized provided in the Phase II report? | Yes: ___ _No: ___ - | |
| 17.h. Was a summary of all background activities conducted under OAC 3745-300-07(J)(7) with the supporting documentation provided in the Phase II report? | Yes: ___ _No: ___ - | |
| 17.i. If modeling was performed, was a summary of all models | Yes: ___ | |

Ohio EPA RCRA AND VAP MOA Track: Phase II Property Assessment

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| used and a description of how the models were calibrated and field validated provided in the Phase II report? | _No: ____ - | |
| 17.j. Is a bibliography of references used for the Phase II property assessment provided in the Phase II report? | Yes: ____ _No: ____ - | |
| 17.k. Are appendices for all supporting documents used for the Phase II property assessment provided in the Phase II report? | Yes: ____ _No: ____ - | |
| 17.l. Were statements provided in the Phase II Report that indicate whether: <ul style="list-style-type: none"> • The property meets applicable generic numerical standards • A property-specific risk assessment is needed; and • Remedial activities are required to meet applicable generic numerical standards? | Yes: ____ _No: ____ - | |

END OF FORM #13

Attachment 1
MOA Phase II Property Assessment
Summary of Demonstration of Compliance with Applicable Standards Table

| Identified Area | Affected Media | Exposure Pathway and Receptor | Point of Compliance | Chemical of Concern | Concentration of Chemical of Concern | Applicable Standard | Method of Determining Applicable Standard | Method of Achieving Compliance with Applicable Standard |
|-----------------|----------------|-------------------------------|-----------------------------|---------------------|--|-----------------------------|---|--|
| 1 | Soil | Direct Contact to Humans | 2.0 feet below grade | mercury | 150 mg/kg | 250 mg/kg | Generic numerical standard | Concentration below applicable standard |
| 1 | Soil | Leaching to Ground Water | Top of Upper Saturated Zone | mercury | 100 mg/kg in soil | 0.002 mg/L in ground water | Generic numerical standard | Ground water zone was assumed to be meet UPUS, weight-or-evidence demonstration used to show it will continue to meet UPUS |
| 2 | Soil | Direct Contact to Humans | 2.0 feet below grade | benzo(a)pyrene | 340 mg/kg | 3.2 mg/kg | Generic numerical standard | Remedy will be used |
| 2 | Soil | Leaching to Ground Water | Top of Upper Saturated Zone | benzo(a)pyrene | 50 mg/kg in soil; not detected in ground water | 0.0002 mg/L in ground water | Generic numerical standard | weight-or-evidence demonstration used to show it will continue to meet UPUS |
| 6 | Ground water | Potable Use | Human receptors | thallium | 0.005 mg/L | 0.008 mg/L | Comparison to background level | Concentration below background level |

Note: Use of this table is recommended, but not required, but a table or tables similar to the example provided must be attached to Form #13.