

Analysis of Brownfields Cleanup Alternatives: 100 River Street, Springfield, Vermont

100 River Street, Springfield, Vermont

SMS #972235

July 14, 2026

Prepared for 100 River Street Ventures, LLC

1. Introduction and Background

Stone Environmental, Inc (Stone) has prepared this Analysis of Brownfields Cleanup Alternatives (ABCA) under contract with Mount Ascutney Regional Commission (MARC) on behalf of 100 River Street Ventures LLC for the property located at 100 River Street in Springfield, Vermont (the Site). 100 River Street Ventures is enrolled in the Vermont Brownfields Reuse Environmental Liability Limitation (BRELLA) Program as a prospective purchaser and currently owns the Site. The Site was assigned Sites Management Section (SMS) #972235 by the Vermont Department of Environmental Conservation (VT DEC) based on past releases from machine manufacturing operations and ancillary practices at the Site.

While several contaminants of concern have been identified and remediated to different extents at the Site, this ABCA is specific to the presence of polychlorinated biphenyls (PCBs) in porous media and on certain non-porous surfaces within the main building. Remaining corrective actions for other contaminants will be addressed under separate cover.

1.1. Site Location

The Site is centered approximately at 43.30140° north latitude and 72.48632° west longitude with elevations ranging between 439 to 445 feet above sea level in the Town of Springfield, Windsor County, Vermont. The Site is an 8.75-acre parcel located at 100 River Street and is identified with the City of Springfield as Parcel 23-1-25.

The Site is in a mixed commercial and residential area in the Central Business District of the Town of Springfield. The Site is bound to the northwest by the former Vermont Machine Tool Company (65 Pearl Street), a former machine manufacturing facility. The Black River defines the north and northeast property boundaries, except for a narrow strip of land northeast of the Black River that is an asphalt parking lot serving patrons of businesses within the Site building; River Street is immediately northeast of this auxiliary parking lot. A pedestrian footbridge spans the Black River from the main building to the parking lot. Pearl Street is located southwest of the Site with residences and a machine shop (Gear Works, Inc., 76 Pearl Street) further southwest. Additional residences and a vacant lot (5 Pearl Street) are southeast of the Site.

The Site includes four buildings: a main, former manufacturing building, a former boiler house, a two story, wood framed commercial building known as the 1898 House, and a former, three-story cafeteria building with attached single story, five-bay garage. The main building, which is the focus of this ABCA, measures approximately 255,000 square feet on two stories except for a portion, hereafter referred as the Office Area, which is three stories and a portion of the north end, which is one story. Figure 1 and Figure 2, attached, show the layout of the ground and first floors of the main building. The Office Area is occupied by the Springfield Health Center, operated by Springfield Medical Care Systems, and is used for medical offices. Tenants in other Site areas include the Visiting Nurses Association (VNA) and Vermont Adult Learning on the ground floor. Until recently, other lease spaces were occupied by Vermont Beer Shapers (a commercial brewery and

tasting room in the northwest end of the main building), a pharmacy (first floor, off the Great Hall), and a café (first floor northeast section of the main building).

1.2. Project Goal

100 River Street Ventures intends to redevelop the Site as part of a greater redevelopment project centered at 100 River Street and 5 Pearl Street. Near term, planned improvements include creating self-storage units in the basement and unspecified commercial leases in the remaining upper floor spaces. Potential uses include a range of commercial and community-serving functions, such as healthcare-related services, professional offices, retail storefronts, and a restaurant, brewery, or cafe. Ancillary improvements will include installation of new HVAC and bathrooms.

1.3. Previous Site Uses

The property was originally developed in 1836 and used as a sawmill, wooden doll factory, and carriage painting shop and was developed as a paper mill by 1856. The property use was converted to machine manufacturing by the Fellows Gear Shaper Company who operated at the property from 1896 to 1983. According to available plans for the property, the oldest building that still exists was constructed in 1898 along Pearl Street (i.e., the 1898 House).

Additional buildings were constructed at the property between the original structure and the Black River between 1899 and 1953. These buildings were first used to manufacture machines to fabricate gears. In its original configuration, the business utilized a canal that provided waterpower to the older incarnations of the manufacturing facility. A covered bridge spanned the canal in the area south of the southern loading dock. Prior to 1948, the property was traversed by Opal Street, a now discontinued street that extended from the intersection of Pearl and Morgan Streets, passed under the plant, and beneath the Office Area. Street curb stones are still present and visible within the main building. The footbridge from River Street previously carried vehicles and horse carriage traffic, intersecting with Opal Street beneath the Office Area.

The Jones and Lamson Company used a portion of these facilities to manufacture gun turrets during the World War II era. Machining operations occurred at the property until Fellows Gear Shaper Company moved out of the complex in 1983.

The newest additions to the complex occurred in 1942 and 1953, which included buildings located along the Black River. These buildings were primarily used for office space. Prior to renovations and as recently as 2009, the 100 River Street property was primarily used for the storage of equipment, supplies, chemicals and/or documents.

1.4. Site Assessment Findings and any Previous Cleanup/Remediation

Environmental investigations have been conducted at the 100 River Street property many times since the 1990s because of its long history as an industrial manufacturing facility. A major focus of these investigations has been the release of PCBs to Site media. PCBs were found in or near former transformers, building materials (concrete slabs, masonry wall, and steel columns), exterior soil, asphalt, and residual oil. Investigations also identified other environmental concerns, including chlorinated solvents in soil, soil gas, and groundwater, former underground storage tanks, asbestos-containing materials, and lead-based paint, however, those impacts are addressed under separate cover.

Several cleanup and management actions have been completed at the Site. A Corrective Action Plan (CAP) and Risk-Based Cleanup Plan were completed by Johson Company (JCO) in 2009 to describe remediation and mitigation activities planned for the Site. These included removing PCB-containing transformers and electrical equipment, cleaning up selected transformer areas and an underground vault, addressing PCB-affected concrete and building materials, removing affected outdoor transformer pads and nearby soil, cleaning a cutting oil recycling tank, and removing waste materials from the building. Long-term maintenance and monitoring measures were also established to help manage PCB-affected materials remaining in place, where appropriate. Corrective actions were completed in select areas of the Site and main

building in early 2010s to support redevelopment goals and phasing. A summary of the current status of proposed remedial activities is included as the attached Corrective Action Status by Room table. Additional details of the investigations conducted at the Site can be found in the 2009 JCO CAP and Stone's 2026 Partial CAP Amendment.

1.5. Regional and Site Vulnerabilities

According to the State of Vermont's Initial Vermont Climate Action Plan, climate change is and will continue to result in changes to wind and snowfall, increasing temperatures, and increases in overall precipitation. Impacts of an increase in overall rainfall and flood hazards are most applicable to the remedial strategy at the Site. While located next to the Black River, the Site is not located in a mapped floodplain; however, design considerations will include strategies to support resilience to anticipated extreme weather events from increased temperatures and rainfall.

2. Applicable Regulations and Cleanup Standards

Cleanup alternatives presented in this ABCA were developed to address the potential exposure risk posed by PCBs in building materials within the main building at the Site.

2.1. Cleanup Oversight Responsibility

Corrective action implementation will be overseen by the VT DEC and EPA TSCA. All documents prepared for this Site are submitted to the VT DEC under SMS#97-2235 and EPA TSCA.

2.2. Cleanup Standards for Major Contaminants

PCBs are regulated by the EPA under 40 CFR Part 761, under the authority of EPA TSCA Division. PCBs are present within building materials including porous media (i.e., concrete and masonry walls), and on non-porous surfaces (i.e., steel columns) and require cleanup in accordance with TSCA regulations for the following reasons:

- PCBs are present in proposed high-occupancy areas at levels above 1.0 mg/kg in porous materials and above 10 $\mu\text{g}/100\text{ cm}^2$ on non-porous surfaces,
- PCBs are presumed to have been released from a source or sources with unknown PCB concentrations, and
- PCBs may have, in part, been released after 1978.

PCB analytical results from previous environmental investigations were compared to the following regulatory criteria:

- Concrete: TSCA cleanup levels regulated by the EPA under 40 CFR Part 761. Section 761.61(a) of the CFR outlines the following cleanup levels of porous media at PCB contaminated sites:
 - High Occupancy, no cap: less than or equal to ($\leq$) 1.0 mg/kg
 - High Occupancy, with cap: greater than ($>$) 1.0 mg/kg, but $\leq$ 10 mg/kg
 - Low Occupancy, no cap: $\leq$ 25 mg/kg
 - Low Occupancy, no cap, with signage indicating the presence of PCBs: $>$ 25 mg/kg, but $\leq$ 50 mg/kg.
 - Low Occupancy, with cap: $>$ 25 mg/kg, but $\leq$ 100 mg/kg
- Wipe Samples: TSCA cleanup levels for non-porous surfaces include:
 - $\leq$ 10 $\mu\text{g}/100\text{ cm}^2$ for high occupancy use
 - $\leq$ 100 $\mu\text{g}/100\text{ cm}^2$ for low occupancy use

2.3. Laws and Regulations Applicable to the Cleanup

The following laws and regulations apply to the cleanup at this Site:

- VT ANR Environmental Protection Rules, Chapter 25, Investigation and Remediation of Contaminated Properties Rule (IRule; effective Feb. 23, 2024),
- BRELLA program codified at 10 V.S.A. §6641-§6656,
- Lead-Based Paint: Vermont Regulations for Lead Control V.S.A. Title 18, Chapter 38,
- PCBs: EPA under 40 CFR Part 761, under the authority of TSCA,
- OSHA HAZWOPER (29 CFR 1910.120), and
- Applicable permits (e.g., electrical for system power drops).

3. Evaluation of Cleanup Alternatives

Areas of the building addressed in this ABCA include Part E in the ground floor (Figure 1) and Part C, Part H (room H1, H2, H3), Part J, and Part NLD on the first floor (Figure 2). Areas not addressed in this ABCA include portions of the main building that have already been remediated/mitigated under prior remediation actions. These were addressed by installing barriers and conducting long-term monitoring. Other tasks inherent to the cleanup plan, but not included in this alternative analysis include decommissioning of a deep on-site water supply well, closure of a freight elevator, and closure of the old transformer room T2.

3.1. Cleanup Alternatives Considered

To address contamination at the Site in areas that have not yet been addressed, three different alternatives were considered, including:

- Alternative #1: No Action,
- Alternative #2: removal of PCB containing material greater than 1 mg/kg and decontamination of steel columns, and
- Alternative #3: encapsulation/barrier over PCB containing material greater than 1 mg/kg and long-term air monitoring.

3.2. Assessment of Cleanup Alternatives

The effectiveness, implementability, and cost of each alternative is considered below.

3.2.1. Effectiveness – Including Vulnerability/Resiliency Considerations

- Alternative #1: The No Action alternative is not protective and contaminants remain. PCB exposure risk persists to future Site occupants.
- Alternative #2: The removal alternative is very effective as it removes all PCB contamination from the non-remediated areas of the Site main building such that there is no further risk of exposure to site users. No resiliency consideration is necessary. Additional testing may be required to delineate exceedances on the building walls.
- Alternative #3: The encapsulation/barrier alternative uses a 6-mil polyethylene vapor barrier and 4-inches of concrete on the floor and two coats of epoxy paint or a 6-mil polyethylene vapor barrier and painted drywall on the walls to cover PCB contaminated materials and prevent exposure. Any loose/flaking potential lead-based paint will be scraped and primed prior to covering the walls. Long-term maintenance of the barriers and indoor air monitoring is required with this alternative. This method is effective, however, the barriers will require upkeep to prevent future exposure risk. Resiliency considerations for alternative #3 include upkeep of external stormwater management systems to prevent water infiltration and damage/wear to barriers.

3.2.2. Implementability

- Alternative #1: Very easy (no action)

- Alternative #2: Technically challenging as this requires removing and replacing portions of the building that may be structurally significant while minimizing closures or exposure to users of the occupied portions of the building.
- Alternative #3: Technically practical, while this method requires significant construction it consists of mostly standard construction methods such as concrete slab installation, painting, and drywall installation generally requiring non-specialized skills. Epoxy painting of walls may require a specialty contractor to conduct. On-going monitoring and maintenance is required in perpetuity.

3.2.3. Cost

Table 1 below describes the alternative costs. Alternative #3 cost estimate is based on installation and operation and maintenance for 30 years.

Table 1: Cost of Each Alternative

Alternative	Description	Estimated Total Cost
#1	No Action	\$0
#2	Contaminated Building Material Removal	\$1,250,000
#3	Encapsulation/Barrier Installation	\$1,200,000

3.3. Recommended Cleanup Alternative

Alternative #3: Encapsulation/Barrier Installation is the recommended alternative. The implementation of Alternative #3 will reduce exposure risk while requiring non-specialty construction and minimizing overall redevelopment costs. For example, Alternative #3 includes drywall installation, which otherwise would need to be constructed after remediation. Additionally, the benefit of eliminating air monitoring is not significant as other portions of the building already require long-term air monitoring.

3.3.1. Green and Sustainable Remediation Measures for Selected Alternative

Best Management Practices (BMPs) issued under ASTM Standard E-2893-16: Standard Guide for Greener Cleanups will be implemented where possible in this effort. The following BMPs have been identified as pertinent to this project:

- Reduced transport of building materials for disposal thereby reducing greenhouse gas emissions from transportation.
- Keep concrete slab thickness to 4-inches to reduce energy intensive material usage.
- Minimize material use and waste generation; reuse existing infrastructure where safe.
- Implement robust storm/weather protection for building to improve resilience to extreme events.

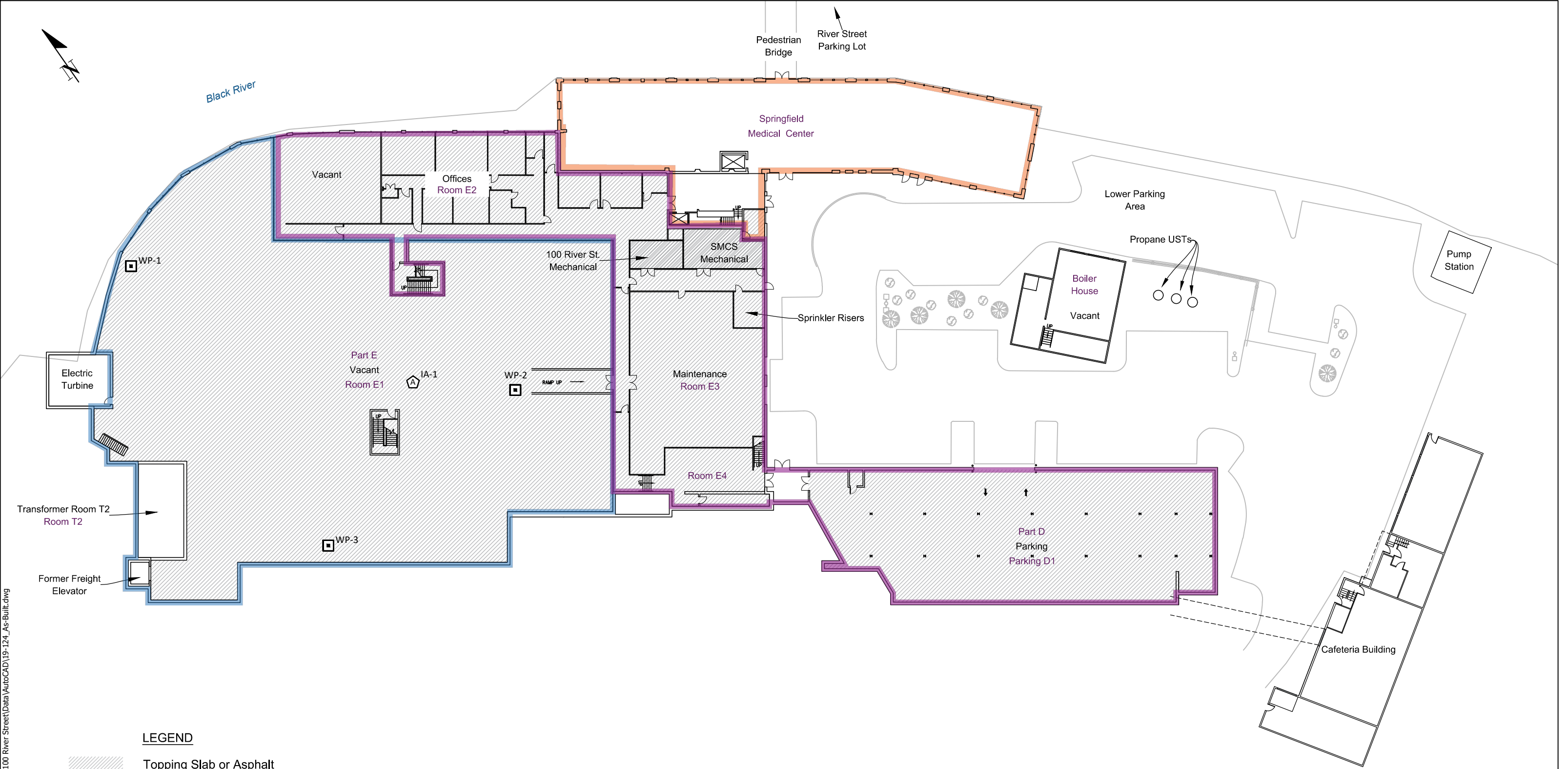
4. Proposed Cleanup

The proposed cleanup will install a vapor barrier and 4-inch concrete slab over the remaining contaminated slab and either two coats of epoxy paint or vapor barrier and painted drywall over remaining contaminated vertical surfaces. This will help to mitigate direct contact and inhalation exposure to remaining PCB impacted materials in the main building. Long-term air monitoring will be required to ensure that the corrective action efficacy is maintained. In addition, the proposed cleanup of the remaining portions of the main building will include closure of the T2 former transformer room using concrete masonry unit (CMU) blocks, closure of the freight elevator using CMU blocks or the vapor barrier/drywall barrier, and abandonment of a bedrock water supply well.

A partial CAP Amendment has been prepared in accordance with §35-606 of the VTDEC IRule, to implement the proposed cleanup.

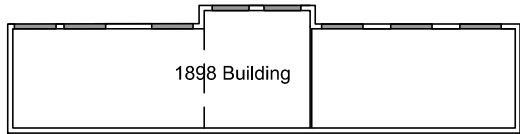
ATTACHMENTS

- Figure 1: Floor Plan & Proposed Verification Samples – Ground Floor
- Figure 2: Floor Plan & Proposed Verification Samples – First-Floor
- Corrective Action Status by Room



LEGEND

- Topping Slab or Asphalt
- Remedial Work Remaining
- Operation and Maintenance (O&M) Required - PCBs
- Operation and Maintenance (O&M) Required - VOCs
- Proposed Indoor Air Sample
- Proposed Wipe Sample



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DRAWING CREDITS	#	Date	Drwn	Chk'd	App'd	Description
	1	8/28/25	LBR	DGJ	8/28/25	Proposed sample locations added
	REVISIONS					
Project No.: 19-124						



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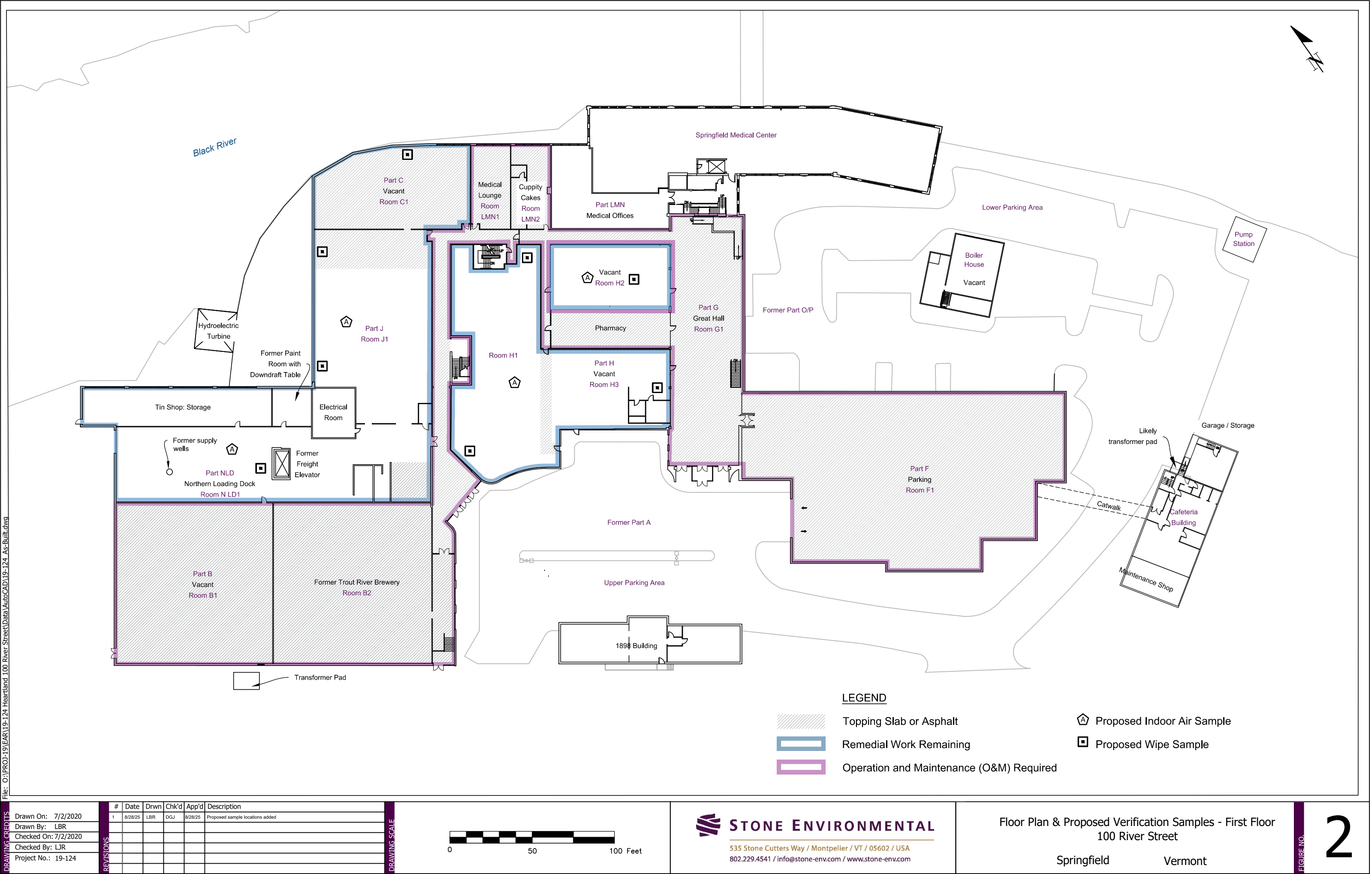
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Floor Plan & Proposed Verification Samples - Ground Floor
100 River Street

Springfield Vermont

FIGURE NO.

1



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DRAWING CREDITS	REVISIONS					
	#	Date	Drwn	Chk'd	App'd	Description
	1	8/28/25	LBR	DGJ	8/28/25	Proposed sample locations added
DRAWING SCALE						
Drawn On: 7/2/2020						
Drawn By: LBR						
Checked On: 7/2/2020						
Checked By: LJR						
Project No.: 19-124						



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Floor Plan & Proposed Verification Samples - First Floor
100 River Street
Springfield Vermont

Corrective Action Status by Room
100 River Street, Springfield, VT
(SMS# 97-2235)

Floor	Room Assignment	Status (December 2025)	CAP Requirements	Remaining Corrective Actions - Scope of Work	O&M Requirements ¹
Ground	Room E1	Incomplete	- Section off hallways and eastern portion from main machine shop and transformer room - Install 4-inch concrete cap with vapor barrier - Paint walls and columns with 2 coats of epoxy paint or encapsulate with vapor barrier and gypsum board physical barrier.	- Stabilize walls and columns - Cover concrete cap floor with poly sheeting - If painting: Stabilize paint by scraping to refusal in lead-safe manner - If physical barrier: Remove any large loose paint flakes in lead-safe manner - When finished dispose of poly sheeting as PCB remediation waste - Encapsulate walls and columns - If painting: Prime and apply two coats of epoxy paint to walls - If physical barrier: install aluminum frame, min. 6-mil poly sheeting vapor barrier, min. 1/2" gypsum board and finish with latex paint. - Conduct confirmation sampling - Complete O&M requirements including these observed repairs: - Repair concrete cap - Seal cracks in slab with joint filler - Grind joint filler flush with slab after it has cured	- Concrete surfaces inspection and maintenance - Painted and physical barrier wall surfaces inspection and maintenance - Indoor air sampling for PCBs - Document findings and repairs on appropriate forms of MMIP
Ground	Room E2	Complete - O&M Only		None - Complete O&M requirements	
Ground	Room E3	Complete - O&M Only		None - Complete O&M requirements	
Ground	Room E4	Complete - O&M Only		None - Complete O&M requirements	
Ground	Room E4 to F1	Complete - O&M Only (protective barriers need immediate repairs)	Paint floor and walls with 2 coats of epoxy paint	- Complete O&M requirements including these observed repairs: - Repair floor paint: - Cover other surfaces with poly sheeting - Stabilize paint by scraping to refusal in lead-safe manner - Prime and apply 1 or 2 coats of epoxy paint to floor where needed - Dispose of poly sheeting as PCB remediation waste if bottom paint coat was removed during scraping	- Painted wall and floor surfaces inspection and maintenance - Indoor air sampling for PCBs - Document findings and repairs on appropriate forms of MMIP
Ground & First	Freight Elevator (Part E & NLD)	Incomplete	- Drain hydraulic fluids from elevator components - Seal elevator access	- Drain elevator gearbox and other associated vessels containing free liquids and dispose of fluid as PCB remediation waste - Wall up and seal elevator access on first and second floor using concrete masonry blocks - Complete O&M requirements	- Inspection and maintenance of sealed access ways to elevator - Document findings and repairs on appropriate forms of MMIP
Ground	Room T2	Incomplete	- Abandon underground vault - Wall up access to the room - Apply waterproof seal to exterior wall to reduce groundwater/stormwater infiltration	- Abandon underground vault: - Pump vault dry and contain contents in 350-gallon totes or drums - Fill vault with concrete - Sample vault contents for waste characterization and appropriately dispose of off-site based on the sample results - Wall up and seal eastern door using concrete masonry blocks - Seal southern door using lockable mandoor - Apply water sealant to exterior wall inside transformer room - Complete O&M requirements	- Inspection and maintenance of walls, locked door, and signage - Document findings and repairs on appropriate forms of MMIP
Ground & First	Parking F1/D1	Complete - O&M Only (protective barriers need immediate repairs)	- Demolish southeastern portion of the garage - Install asphalt cap - Paint walls with 2 coats of epoxy paint	- Complete O&M requirements including these observed repairs: - Repair wall paint: - Cover existing cap and nearby equipment with poly sheeting - Stabilize paint by scraping to refusal in lead-safe manner - Prime and apply 1 or 2 coats of epoxy paint to walls where needed - Dispose of poly sheeting as PCB remediation waste if bottom paint coat was removed during scraping - Repair asphalt cap with new hot asphalt patch	- Asphalt surface inspection and maintenance - Painted wall surfaces inspection and maintenance - Document findings and repairs on appropriate forms of MMIP

Corrective Action Status by Room
100 River Street, Springfield, VT
(SMS# 97-2235)

Floor	Room Assignment	Status (December 2025)	CAP Requirements	Remaining Corrective Actions - Scope of Work	O&M Requirements ¹
First	Room B1	Complete - O&M Only (protective barriers need immediate repairs)	- Construct interior wall to divide space in two (B1 & B2) - Install 4-inch concrete cap with vapor barrier - Paint walls with 2 coats of epoxy paint	- Complete O&M requirements and including these observed repairs: - Repair wall paint: - Cover existing cap and nearby equipment with poly sheeting - Stabilize paint by scraping to refusal in lead-safe manner - Prime and apply 1 or 2 coats of epoxy paint to walls where needed - Dispose of poly sheeting as PCB remediation waste if bottom paint coat was removed during scraping	- Concrete surfaces inspection and maintenance - Painted wall surfaces inspection and maintenance - Indoor air sampling for PCBs - Document findings and repairs on appropriate forms of MMIP
First	Room B2	Complete - O&M Only		None - Complete O&M requirements	
First	Room C1	Incomplete	- Construct wall to divide the space into two sections (Room C1 and portion included in J1-see below). - Install 4-inch concrete cap with vapor barrier - Paint walls and columns with 2 coats of epoxy paint or encapsulate with vapor barrier and gypsum board physical barrier.	- Stabilize walls and columns and encapsulate with paint or physical barrier (see E1) - Conduct confirmation sampling - Complete O&M requirements	- Concrete surfaces inspection and maintenance - Painted and physical barrier wall surfaces inspection and maintenance - Indoor air sampling for PCBs - Document findings and repairs on appropriate forms of MMIP
First	Room G1 (Great Hall)	Complete - O&M Only (protective barriers need immediate repairs)	- Install 4-inch concrete cap with vapor barrier - Paint walls with 2 coats of epoxy paint	- Complete O&M requirements including these observed repairs: - Repair concrete cap: - Seal cracks with joint filler - Grind joint filler flush with slab after it has cured	- Concrete surfaces inspection and maintenance - Painted wall surfaces inspection and maintenance - Indoor air sampling for PCBs - Document findings and repairs on appropriate forms of MMIP
First	Room H1	Incomplete	- Construct divider walls to section off into 4 spaces. - Install 4-inch concrete cap with vapor barrier - Paint walls and columns with 2 coats of epoxy paint or encapsulate with vapor barrier and gypsum board physical barrier.	- Stabilize walls and columns and encapsulate with paint or physical barrier (see E1) - Pour 4-inch concrete cap with vapor barrier - Conduct confirmation sampling - Complete O&M requirements	- Concrete surfaces inspection and maintenance - Painted and physical barrier wall surfaces inspection and maintenance - Indoor air sampling for PCBs - Document findings and repairs on appropriate forms of MMIP
First	Room H2	Incomplete			
First	Room H3	Incomplete			
First	Pharmacy	Complete - O&M Only		None - Complete O&M requirements.	
First	Room J1	Incomplete	- Install 4-inch concrete cap with vapor barrier (except for portion of Part C now included in Room J1) - Paint walls and columns with 2 coats of epoxy paint or encapsulate with vapor barrier and gypsum board physical barrier.	- Stabilize walls and columns and encapsulate with paint or physical barrier (see E1) - Pour 4-inch concrete cap with vapor barrier except for portion near Part C where concrete cap was already installed - Conduct confirmation sampling - Complete O&M requirements	- Concrete surfaces inspection and maintenance - Painted and physical barrier wall surfaces inspection and maintenance - Indoor air sampling for PCBs - Document findings and repairs on appropriate forms of MMIP
First	Room LMN1	Complete - O&M Only	- Install 4-inch concrete cap with vapor barrier - Paint walls with 2 coats of epoxy paint	None - Complete O&M requirements	- Concrete surfaces inspection and maintenance - Painted wall surfaces inspection and maintenance - Indoor air sampling for PCBs - Document findings and repairs on appropriate forms of MMIP
First	Room LMN2				
First	Medical Offices (Part LMN)	N/A	No corrective actions required	N/A	N/A
First	Room NLD1	Incomplete	- Install 4-inch concrete cap with vapor barrier - Paint walls and columns with 2 coats of epoxy paint or encapsulate with vapor barrier and gypsum board physical barrier. - Abandon supply well	- Hire licensed driller to abandon the supply well - Stabilize walls and columns and encapsulate with paint or physical barrier (see E1) - Pour 4-inch concrete cap with vapor barrier - Conduct confirmation sampling - Complete O&M requirements	- Concrete surfaces inspection and maintenance - Painted wall and physical barrier surfaces inspection and maintenance - Indoor air sampling for PCBs - Document findings and repairs on appropriate forms of MMIP

Corrective Action Status by Room
100 River Street, Springfield, VT
(SMS# 97-2235)

Floor	Room Assignment	Status (December 2025)	CAP Requirements	Remaining Corrective Actions - Scope of Work	O&M Requirements ¹
Ground	Springfield Medical Center	Complete - O&M Only	• Install sub-slab depressurization system	• None - Complete O&M requirements	• Collect system performance parameters • Indoor air sampling for VOCs • Document findings and repairs on appropriate forms of MMIP
Ground	Hallways and mechanical rooms	Complete - O&M Only	• Install 4-inch concrete cap with vapor barrier • Paint walls with 2 coats of epoxy paint	• None - Complete O&M requirements	• Concrete surfaces inspection and maintenance • Painted wall surfaces inspection and maintenance • Indoor air sampling for PCBs • Document findings and repairs on appropriate forms of MMIP
First	Hallways	Complete - O&M Only	• Install 4-inch concrete cap with vapor barrier • Paint exterior walls with 2 coats of epoxy paint	• None - Complete O&M requirements	• Concrete surfaces inspection and maintenance • Painted wall surfaces inspection and maintenance • Indoor air sampling for PCBs • Document findings and repairs on appropriate forms of MMIP

Notes:

1. O&M Requirements detailed in Long-Term Monitoring and Maintenance Implementation Plan (MMIP) for Risk-Based PCB Cleanup (Stone, 2012)