UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 14 2015

REPLY TO THE ATTENTION OF:
LC- 8J

CERTIFIED MAIL: No.7011 1150 0000 2643 8609
RETURN RECEIPT REQUESTED
Mr. Jill Barker
CEO/Superintendent
Anderson Preparatory Academy
101 W. 29th St.
Anderson, Indiana 46016

Consent Agreement and Final Order In the Matter of
Anderson Preparatory Academy Inc. Docket No. **TSCA-05-2015-0010**

Mr. Barker:

Enclosed pleased find a copy of a fully executed Consent Agreement and Final Order (CAFO) in resolution of the above case. This document was filed on August 14, 2015 with the Regional Hearing Clerk.

The civil penalty in the amount of $44,590 is to be paid in the manner described in paragraphs 33 and 35. Please be certain that the docket number is written on both the transmittal letter and on the check.

Thank you for your cooperation in resolving this matter.

Sincerely,

Kendall Moore
Pesticides and Toxics Compliance Section

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**Docket No. TSCA-05-2015-0010**
	)	
Anderson Preparatory Academy, Inc.	)	**Proceeding to Assess a Civil Penalty**
Anderson, Indiana,	)	**Under Section 16(a) of the Toxic**
	)	**Substances Control Act, 15 U.S.C.**
Respondent.	)	**§ 2615(a)**
	)	

Consent Agreement and Final Order

Preliminary Statement

1. This is a civil administrative action commenced and concluded under Section 16(a) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2615(a), and Sections 22.1(a)(5), 22.13(b), and 22.18(b)(2) and (3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), as codified at 40 C.F.R. Part 22.

2. The Complainant is the Director of the Land and Chemicals Division, United States Environmental Protection Agency (EPA), Region 5.

3. The Respondent is Anderson Preparatory Academy, Inc. (Anderson), a non-profit Indiana corporation whose address is 101 West 29th Street, Anderson, Indiana, and whose legal name is "Central Indiana Military Academy, Inc."

4. Where the parties agree to settle one or more causes of action before the filing of an administrative complaint, the action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). See 40 C.F.R. § 22.13(b).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interests and in the public interest.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO, to terms of this CAFO, and to the issuance of the final order hereinafter recited.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional and factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO.

Statutory and Regulatory Background

9. The Polychlorinated Biphenyls (PCBs) Disposal and Marking regulations were lawfully promulgated pursuant to Section 6 of TSCA, 15 U.S.C. § 2605. See 43 Fed. Reg. 7,150 (Feb. 17, 1978). The PCBs Manufacturing, Processing, Distribution in Commerce and Use Prohibitions (PCB rule) incorporated previous disposal and marking regulations. See 44 Fed. Reg. 31,514 (May 31, 1979). The PCB rule was subsequently amended and partially recodified at 40 C.F.R. Part 761.

10. Under 40 C.F.R. § 761.3, PCB waste means those PCBs and PCB Items that are subject to the disposal requirements of Subpart D of 40 C.F.R. Part 761.

11. Under 40 C.F.R. § 761.3, disposal means intentionally or accidentally to discard, throw away, or otherwise complete or terminate the useful life of PCBs and PCB Items. Disposal includes spills, leaks, and other uncontrolled discharges of PCBs.

12. Any person disposing of PCB waste must do so in accordance with Subpart D of 40 C.F.R. Part 761. See 40 C.F.R. § 761.50(a).

13. Under 40 C.F.R. § 761.3, a fluorescent light ballast (FLB) is a device that electrically controls fluorescent light fixtures and that includes a capacitor containing 0.1 kg or less of dielectric.

14. Under 40 C.F.R. § 761.60(a), PCB liquids at concentrations ≥ 50 ppm must be disposed of in an incinerator which complies with 40 C.F.R. § 761.70.

15. Under Sections 15 and 16 of TSCA, 15 U.S.C. §§ 2614 and 2615, any person who fails to comply with any provision of 40 C.F.R. Part 761 may be liable for civil penalties.

16. The Administrator of EPA may assess a civil penalty of up to $37,500 per day for each violation of TSCA that occurred after December 6, 2013, pursuant to Section 16 of TSCA, 15 U.S.C. § 2615, and 40 C.F.R. Part 19.

General Factual Allegations

17. At all times relevant to this CAFO, Respondent was a "person" as defined at 40 C.F.R. § 761.3.

18. At all times relevant to this CAFO, Respondent operated a school at 3205 West 25th Street, Anderson, Indiana 46011 (Anderson facility).

19. On September 24, 2014, an FLB in a kindergarten classroom at the Anderson facility failed, and a black liquid leaked from the FLB onto surfaces of the fixture and onto the floor. The black liquid contained 610 ppm of PCBs.

20. On or about March 17, 2015, EPA and Anderson discovered ten additional FLBs throughout the Anderson facility that contained historic releases of black liquid. The hardened black liquid was tested to contain 580 ppm of PCBs.

Count I – Improper Disposal of PCB Liquids (September 2014 Release)

21. The general factual allegations of this CAFO are incorporated by reference as though set forth here in full.

22. On September 24, 2014, an FLB capacitor at the Anderson facility was leaking liquid that contained 610 ppm of PCBs.

23. Anderson did not dispose of the PCB liquid described in paragraph 22 in accordance with 40 C.F.R. § 761.60(a).

24. Failure to dispose of the PCB liquid described in paragraph 22 in accordance with 40 C.F.R. § 761.60(a) constitutes improper disposal of PCB waste in violation of 40 C.F.R. § 761.50(a).

25. Anderson's failure to comply with 40 C.F.R. § 761.50(a), as described in paragraph 24, violates Section 15(1)(C) of TSCA, 15 U.S.C. § 2614(1)(C).

Count II – Improper Disposal of PCB Liquids (Historic Releases)

26. The general factual allegations of this CAFO are incorporated by reference as though set forth here in full.

27. On or about March 17, 2015, EPA and Anderson discovered ten additional FLBs throughout the Anderson facility that contained historic releases of black liquid that was tested to contain 580 ppm of PCBs.

28. Anderson did not dispose of the PCB liquids described in paragraph 27 in accordance with 40 C.F.R. § 761.60(a).

29. Failure to dispose of the PCB liquids described in paragraph 27 in accordance with 40 C.F.R. § 761.60(a) constitutes improper disposal of PCB waste in violation of 40 C.F.R. § 761.50(a).

30. Anderson's failure to comply with 40 C.F.R. § 761.50(a), as described in paragraph 29, violates Section 15(1)(C) of TSCA, 15 U.S.C. § 2614(1)(C).

Civil Penalty

31. Section 16(a)(2)(B) of TSCA, 15 U.S.C. § 2615(a)(2)(B), requires the Administrator to take into account the nature, circumstances, extent and gravity of the violations

and, with respect to the violator, ability to pay, effect on ability to continue in business, any history of prior such violations, the degree of culpability, and such other matters as justice may require, when determining the amount of a civil penalty for violations of TSCA.

32. Based on an evaluation of the facts alleged in this CAFO and the factors in Section 16(a)(2)(B) of TSCA, Complainant determined that an appropriate civil penalty to settle this action is $44,590.

33. Pursuant to 40 C.F.R. § 22.31(c), Respondent is ordered to pay the $44,590 civil penalty for the TSCA violations no later than September 30, 2015. However, if agreed to by the parties, payment of the civil penalty may be deferred until sixty (60) days after the receipt of an order of remittance or order of nonremittance.

34. Respondent must pay the penalty under paragraph 33 by sending by first class mail a cashier's or certified check, payable to the "Treasurer, United States of America," to:

U.S. EPA
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

The check must note "In the Matter of Anderson Preparatory Academy, Inc." and the docket number of this CAFO.

35. A transmittal letter stating Respondent's name, complete address, the case title, the case docket number, and the billing document number must accompany the payment. Respondent must send a copy of the transmittal letter to:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Kendall Moore (LC-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Robert M. Peachey (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

36. This civil penalty is not deductible for federal tax purposes.

37. If Respondent does not pay the civil penalty timely, EPA may refer the matter to the Attorney General, who will recover such amount by action in the appropriate United States district court under Section 16(a)(4) of TSCA, 15 U.S.C. § 2615(a)(4). The validity, amount, and appropriateness of the civil penalty are not reviewable in a collection action.

38. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following amount overdue under this CAFO. Interest will accrue on any amount overdue from the date payment was due at a rate established by the Secretary of the Treasury. Respondent must pay a $15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

39. This CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in the CAFO.

40. This CAFO does not affect the rights of the U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

41. This CAFO does not affect Respondent's responsibility to comply with TSCA and other applicable federal, state and local laws.

42. Respondent waives any and all remedies, claims for relief, and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this CAFO, including any right of judicial review under Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

43. The terms of this CAFO bind Respondent, its successors and assigns.

44. This CAFO is effective immediately upon filing with the Regional Hearing Clerk.

45. Each person signing this CAFO certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

46. Each party agrees to bear its own costs and attorneys fees in this action.

47. This CAFO constitutes the entire agreement between the parties.

Consent Agreement and Final Order
In the Matter of: Anderson Preparatory Academy, Inc.
Docket No. TSCA-05-2015-0010

Anderson Preparatory Academy, Inc., Respondent

7/20/2015
Date

Jill Marie Barker
Jill Barker
CEO/Superintendent
Anderson Preparatory Academy, Inc.

United States Environmental Protection Agency, Complainant

8/7/2015
Date

Margaret M. Guerriero
Director
Land and Chemicals Division
U.S. Environmental Protection Agency, Region 5

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

12 August 2015
Date

Susan Hedman
Regional Administrator
U.S. Environmental Protection Agency
Region 5

In the matter of: Anderson Preparatory Academy Inc.
Docket Number: **TSCA-05-2015-0010**

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing ***Consent Agreement and Final Order***, which was filed on August 14, 2015, in the following manner to the addressees:

Copy by Certified Mail
Return-receipt:

Mr. Jill Barker
CEO/Superintendent
Anderson Preparatory Academy
101 W. 29th St.
Anderson, Indiana 46016

Copy by E-mail to
Attorney for Complainant:

Robert M. Peachey
Peachey.robert@epa.gov

Copy by E-mail to
Regional Judicial Officer:

Ann Coyle
coyle.ann@epa.gov

Dated: August 14, 2015

LaDawn Whitehead
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5

CERTIFIED MAIL RECEIPT NUMBER(S): **7011 1150 0000 2643 8609**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:	)	**Docket No. TSCA-05-2015-0010**
	)	
Anderson Preparatory Academy, Inc.	)	
Anderson, Indiana,	)	
	)	
Respondent.	)	
	)	

Remittance Agreement

Introduction

On AUG 14 2015, Anderson Preparatory Academy, Inc. ("Anderson" or "Respondent") was assessed a penalty of $44,590 by administrative consent agreement and final order for violations of the Toxic Substances Control Act (TSCA). Pursuant to 40 C.F.R. § 22.31(b), Respondent and the United States Environmental Protection Agency (EPA), Region 5 agree to defer payment of the assessed penalty until issuance of a remittance or nonremittance order. The EPA agrees to remit all of the penalty if the actions described in the attached Compliance Program and Schedule are completed by the date specified in the schedule.

Anderson Preparatory Academy, Inc., Respondent

7/20/2015
Date

Jill Maine Barker
Jill Barker
CEO/Superintendent
Anderson Preparatory Academy, Inc.

United States Environmental Protection Agency, Complainant

8/7/2015
Date

Margaret M. Guerriero
Director
Land and Chemicals Division
U.S. Environmental Protection Agency, Region 5

Compliance Program and Schedule

Final Compliance

It is the goal of this Compliance Program and Schedule that Anderson cleanup and properly dispose of all PCB remediation waste from Anderson's school at 3205 West 25th Street, Anderson, Indiana 46011 (Anderson facility), and submit documentation of these activities, no later than September 15, 2015. Anderson will be deemed to be in compliance with this Compliance Program and Schedule, as detailed below, after all light fixtures listed in Appendix C of Attachment A have been removed and disposed of at a facility approved for disposal under 40 C.F.R. Part 761, Subpart D; Anderson has conducted post-cleanup sampling, analysis, and verification; and Anderson has sent compliance documentation for its cleanup to EPA.

After Respondent achieves final compliance with this Compliance Program and Schedule by the agreed date, and EPA has determined that compliance is satisfactory, EPA will issue an order to Respondent remitting the penalty assessed under the CAFO. If compliance is not satisfactory, EPA will issue an order of non-remittance, and the assessed penalty will be due and payable within sixty (60) days after Respondent receives the order of non-remittance.

Anderson's "Remediation Plan for Fluorescent Light Fixtures Containing Polychlorinated Biphenyls (PCBs)" is incorporated into to this Agreement as Attachment A.

Interim Milestones

1. **Removal and Disposal of PCB Remediation Waste**: Respondent shall remove and dispose of all PCB remediation waste in the Anderson facility by removing all light fixtures listed in Appendix C of Attachment A, disposing of all removed ballasts as PCB waste in accordance with 40 C.F.R. § 761.50(b)(2), and disposing of all removed light fixtures as PCB waste in accordance with 40 C.F.R. § 761.61(a)(5)(ii)(B) and 761.61(b). All disposal of PCB

waste shall take place at a facility approved for disposal under 40 C.F.R. Part 761, Subpart D. In addition, after fixture removal, any contaminated non-porous or porous surfaces, liquids, and cleanup wastes must be cleaned or decontaminated, as appropriate, under 40 C.F.R. § 761.61(a)(4) and 761.79(b)(3)(i)(A).

2. **Post-Cleanup Sampling, Analysis, and Verification**: Respondent shall conduct post-cleanup sampling, analysis, and verification, pursuant to 40 C.F.R. § 761.61(a)(6), at any areas where visible traces of smoke residue or accumulated potting material are found on any surface outside of the light fixture.

3. **Submission of Compliance Documentation**: Respondent shall submit, as a "Cleanup Completion Report," all records of the cleanup required to be kept under 40 C.F.R. § 761.61(a)(9), as well as all the results of post-cleanup sampling, analysis, and verification under 40 C.F.R. § 761.61(a)(6). All documentation shall be submitted to:

Kendall Moore (LC-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Robert M. Peachey (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Schedule

Anderson agrees to comply with this Agreement within the time frames summarized below:

1.	Removal and Disposal of PCB Remediation Waste	August 15, 2015
2.	Post-Cleanup Sampling, Analysis, and Verification	August 15, 2015

3.	Submission of Compliance Documentation	September 15, 2015
4.	Final Compliance Target Date	September 15, 2015

EPA Monitoring

Inspectors from EPA may visit Anderson at any time to exercise the Agency's rights under Section 11 of TSCA and to inspect the Anderson facility to determine compliance with this Agreement.

Notification of Technical Difficulties

If technical difficulties make it impossible for Anderson to meet any of the deadlines in the Compliance Schedule, Anderson shall immediately notify EPA by calling Kendall Moore at (312) 353.1147 and Robert M. Peachey at (312) 353.4510.

Technical Assistance

EPA shall provide reasonable technical assistance to Anderson on questions concerning such matters as sampling and analytical procedures and acceptable disposal options for the purpose of complying with this Agreement.

Amendments

Upon mutual consent of EPA and Anderson, this Agreement may be amended at any time to modify or add technical requirements (such as, but not limited to, deadline modifications necessitated by technical or operational difficulties) for the purpose of achieving compliance by Anderson with 40 C.F.R. Part 761. Any changes and/or amendments to this Agreement shall be incorporated into this Agreement when the amendment(s) have been signed by authorized representatives of EPA and Respondent.

Enforcement

While this Agreement is in effect, EPA shall not initiate additional enforcement action against Anderson for improper disposal of PCB remediation waste in violation of 40 C.F.R. § 761.20(a)(4) with respect to the fluorescent light ballasts in the Anderson facility. In the event that Anderson fails to meet the requirements of this Agreement, EPA may issue a Notice of Reinstatement of Penalty nullifying this Agreement and reinstating the penalty assessed in the CAFO.

This Agreement does not insulate Anderson from compliance monitoring and enforcement actions for TSCA violations not addressed by this Agreement, nor from enforcement actions under other laws enforced by EPA, nor under laws administered by state or local environmental authorities.

This Agreement does not limit or affect the rights of Anderson or the United States as against any third parties.

Confidentiality of Documents

Anderson may claim that any documents submitted to EPA are confidential business information.

Remittance Agreement
In the Matter of: Anderson Preparatory Academy, Inc.
Docket No. TSCA-05-2015-0010

Attachment A

Anderson's Remediation Plan for Fluorescent Light Fixtures Containing Polychlorinated Biphenyls (PCBs)

REMEDIATION PLAN
FOR FLUORESCENT LIGHT FIXTURES CONTAINING POLYCHLORINATED BIPHENYLS (PCBS)

ANDERSON PREPARATORY ACADEMY
ELEMENTARY SCHOOL
3205 WEST 25TH STREET
ANDERSON, INDIANA

REMEDIATION PLAN FOR FLUORESCENT LIGHT FIXTURES CONTAINING POLYCHLORINATED BIPHENYLS (PCBs)

Prepared for:

Anderson Preparatory Academy
Elementary School
3205 West 25th Street
Anderson, Indiana

Prepared by:

Alliance Environmental Group, Inc.
5340 Commerce Circle, Suite E
Indianapolis, Indiana 46237
317-865-3400

Table of Contents

Appendices

Background

Anderson Preparatory Academy Elementary School is located at 3205 West 25th Street in Anderson, Madison County, Indiana. The facility consists of a 33,845 square foot, one story building on 10.080 acres. The building was erected in 1955. The site is owned by Central Indiana Military Academy. The listed transfer date is March 1, 2009. The site is currently used as an elementary school for kindergarten through second grade (K – 2) and operates as a public charter school. The building has 17 classrooms, a gymnasium, a kitchen and office space. The school was originally 25th Street Elementary School, which was closed in the early 2000s. In 2004, the property was rezoned as B-3 Neighborhood Shopping Center, and later rezoned to R-2 Residential. In 2008 a special exception approval was granted to return the facility for use as an elementary school. The site has operated as Anderson Preparatory School since 2008. A mpa locating the site is included in Appendix A.

Nature of Contamination

On Tuesday, September 23, 2014, a fluorescent light ballast failed in a classroom (Room 2) at Anderson Preparatory Academy Elementary School. The failure resulted in a release of smoke into the classroom, as well as leakage of potting material onto the fluorescent light fixture and onto an area rug on the floor. Subsequent investigations found burned potting material or smoke residue on fluorescent fixtures throughout the facility (see Location and Extent of Contaminated Area).

Sampling Summary

On September 26, 2014, the Indiana Department of Environmental Management, Office of Land Quality (IDEM – OLQ) collected seven wipe samples from light fixtures at Anderson Preparatory Academy Elementary School. Information regarding the sample locations, sampling methodology (including the area size of the sample) and sampling media were not provided. Samples were submitted to Microbac Laboratories, Inc. for polychlorinated biphenyl (PCB) analysis. The laboratory reported that sample #2 contained 2,100 micrograms (µg) of PCBs and sample #1 contained 6.4 µg of PCBs. The laboratory reported that the remaining five samples had not detectable levels of PCBs above the laboratory's reporting limit of 1.0 µg. Samples were analyzed by SW 846 Method 8082.

Air samples were collected on October 2, 2014. Two samples were collected from Room 2, where the ballast failure occurred, one sample was collected from Room 10, and one sample was labelled as "Room HW". The samples collected from Room 2 were reported as containing PCBs at levels of 99 nanograms per cubic meter (ng/m^3)

of air and 95 ng/m^3. The sample from "Room HW" was reported as containing 210 ng/m^3, and the sample collected from Room 10 contained 85 ng/m^3.

Copies of these lab reports are included in Appendix B.

On December 8, 2014, the United States Environmental Protection Agency (EPA) collected wipe samples from seven light fixtures at Anderson Preparatory Academy Elementary School, including four samples from Room 2, one sample from the kitchen, on sample in Room 6 and one sample from Room 4. EPA reported, via email, sample concentrations of 11 micrograms per 100 square centimeters (µg/100 cm^2, kitchen), 26 µg/100 cm^2 (Room 6), 75 µg/100 cm^2 (Room 4), and 18, 78, 94 and 1,000 µg/100 cm^2 from the sampled collected from Room 2. Copies of the laboratory report were not provided. A description of sample locations in Room 2 was provided via email.

EPA conducted additional sampling on March 17, 2015, including five wipe samples and one bulk sample of potting material residue on a light fixture in Room 9. EPA reported, via conference call on April 17, 2015, that one wipe sample, obtained from a previously sampled light fixture in the kitchen, had a PCB concentration of 23 cm^2. The remaining four samples had PCB concentrations of less than 10 µg/100 cm^2. The bulk sample of potting material residue contained 610 parts per million (ppm) PCB.

Location and Extent of Contaminated Area

On April 7, 8 and 28, Anderson Preparatory Academy and Alliance Environmental Group conducted a visual inspection and inventory of all light fixtures within Anderson Preparatory Academy Elementary School. Fluorescent light fixtures were opened and the fixture surfaces were observed for any accumulation of burned potting material or smoke residue. A total of 218 light fixtures were identified which require remediation, including 161 fixtures with burned potting material residue and 57 light fixtures with smoke residue. A drawing indicating the location of affected fixtures is provided in Appendix C.

Cleanup Plan

The cleanup plan will consist of removal and disposal of light fixtures which have smoke residue, accumulated burned potting material or unlabeled ballasts. Light fixtures will be wrapped in polyethylene sheeting prior to transport to a licensed disposal facility which is approved to accept PCB waste. All unlabeled ballasts will also be disposed as PCB waste. Unlabeled ballasts will be placed in a drum for transportation and disposal.

The last day for students is May 28, 2015. Anderson Preparatory Academy intends to close the building at that time. The period from May 28 to June 15 will be used to

relocate personnel, furniture and equipment, as necessary, from the building. The building will be vacant by June 15, 2015. Removal of light fixtures will begin on June 15, 2015, and will be completed by August 15, 2015.

The cleanup will be prioritized as follows: 1) removal of fixtures with accumulated potting material, 2) removal of unmarked or PCB ballasts, followed by 3) removal of smoke damaged light fixtures.

Light fixtures will be inspected on a weekly basis until removal begins on June 15. Any fixtures which exhibit new evidence of ballast failure will be removed immediately.

Certifications

I, Jill Barker, Commandant of Anderson Preparatory Academy, certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at Anderson Preparatory Academy Elementary School, are on file at 3205 West 25th Street, Anderson, Indiana, and are available for EPA inspection.

Jill Barker

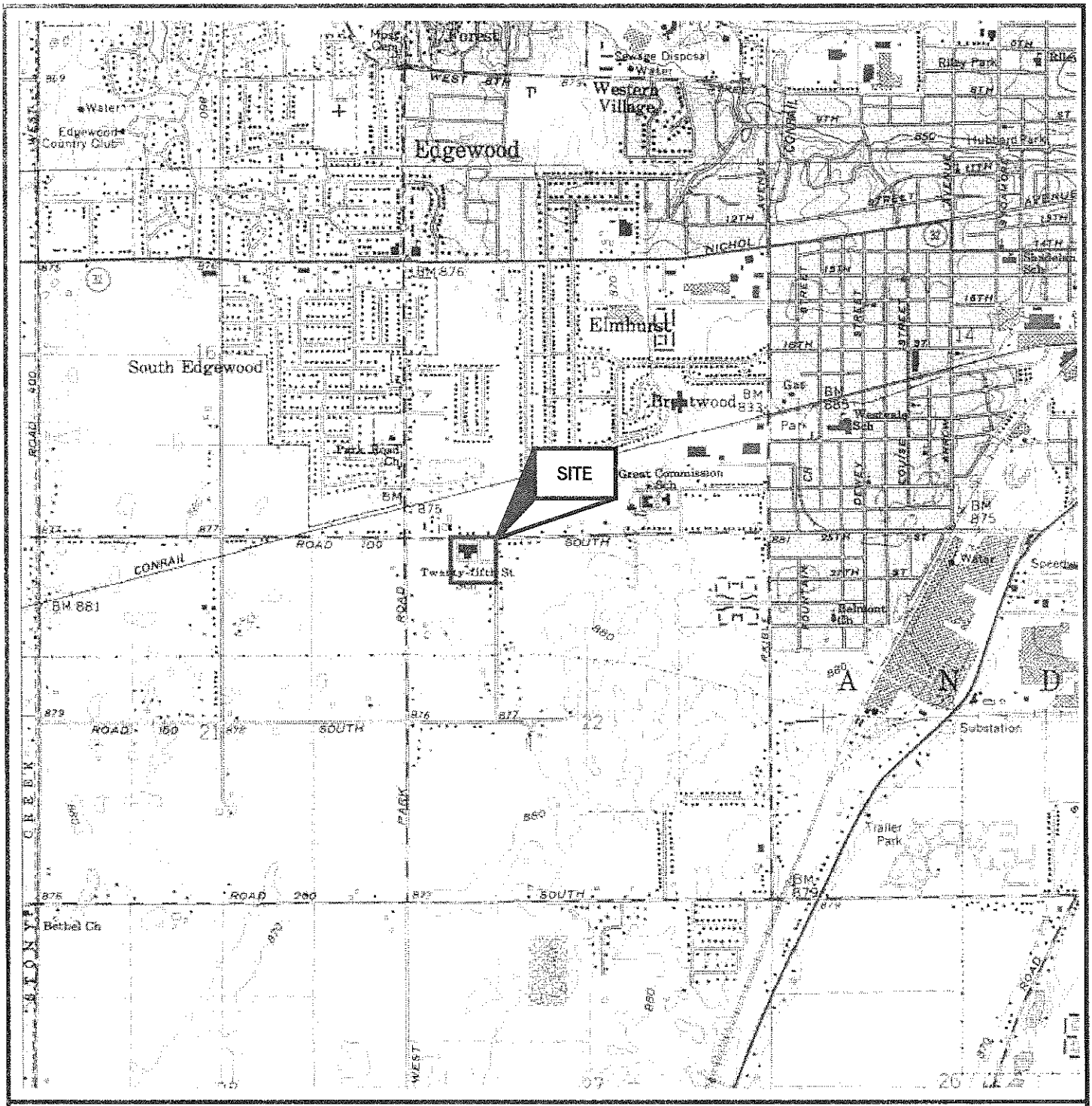
I, Jim Roan, Maintenance Director of Anderson Preparatory Academy and the party supervising this self-implementing cleanup, certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at Anderson Preparatory Academy Elementary School, are on file at 3205 West 25th Street, Anderson, Indiana, and are available for EPA inspection.

Jim Roan

Appendices

APPENDIX A

SITE LOCATION MAP



U.S. GEOLOGICAL SURVEY
7.5 MINUTE SERIES TOPOGRAPHIC MAP
ANDERSON SOUTH, IND. QUADRANGLE, 1961
PHOTOREVISED 1981 MINOR REVISION 1994
CONTOUR INTERVAL 10 FEET
SCALE: 1:24000

ALLIANCE
Environmental Group, Inc.

FIGURE 1
USGS TOPOGRAPHIC MAP
ANDERSON PREPARATORY ACADEMY ELEMENTARY
3205 WEST 25TH STREET
ANDERSON, INDIANA

APPENDIX B

LABORATORY REPORTS

MICROBAC®

October 1, 2014

Indiana Department of Environmental Management
OLQ, 100 N. Senate Ave., Room N1101
Indianapolis, IN 46204-2251

Work Order No.: 14I1235

Re: OL198 - OL204

Dear David Harrison:

Microbac Laboratories, Inc. - Chicagoland Division received 7 sample(s) on 9/29/2014 2:57:00PM for the analyses presented in the following report as Work Order 14I1235.

The enclosed results were obtained from and are applicable to the sample(s) as received at the laboratory. All sample results are reported on an "as received" basis unless otherwise noted.

All data included in this report have been reviewed and meet the applicable project specific and certification specific requirements, unless otherwise noted. A qualifications page is included in this report and lists the programs under which Microbac maintains certification.

This report has been paginated in its entirety and shall not be reproduced except in full, without the written approval of Microbac Laboratories.

We appreciate the opportunity to service your analytical needs. If you have any questions, please contact your project manager. For any feedback, please contact Robert Crookston, Interim Managing Director, at robert.crookston@microbac.com.

Sincerely,
Microbac Laboratories, Inc.

Kristen Gehlbach
Senior Project Manager

MICROBAC®

WORK ORDER SAMPLE SUMMARY

Date: *Wednesday, October 1, 2014*

Client: Indiana Department of Environmental Management
Project: OL198 - OL204
Lab Order: 14I1235

Lab Sample ID	Client Sample ID	Tag Number	Collection Date	Date Received
14I1235-01	#1		09/26/2014 11:26	9/29/2014 2:57:00PM
14I1235-02	#2		09/26/2014 11:30	9/29/2014 2:57:00PM
14I1235-03	#3		09/26/2014 11:34	9/29/2014 2:57:00PM
14I1235-04	#4		09/26/2014 11:38	9/29/2014 2:57:00PM
14I1235-05	#5		09/26/2014 11:40	9/29/2014 2:57:00PM
14I1235-06	#6		09/26/2014 11:42	9/29/2014 2:57:00PM
14I1235-07	#7		09/26/2014 11:47	9/29/2014 2:57:00PM

MICROBAC®

CASE NARRATIVE **Date:** *Wednesday, October 1, 2014*

Client: Indiana Department of Environmental Management
Project: OL198 - OL204
Lab Order: 14I1235

The 14I1235-02 (#2) sample required a dilution due to target analyte being above the instrument's linear range for the analyte. Reporting limits have been adjusted to reflect the dilution level. The surrogates were diluted out and flagged SD.

MICROBAC®

Analytical Results

Date: *Wednesday, October 1, 2014*

Client: Indiana Department of Environmental Management
Client Project: OL198 - OL204
Client Sample ID: #1
Sample Description:
Matrix: Wipe

Work Order/ID: 14I1235-01
Sampled: 09/26/2014 11:26
Received: 09/29/2014 14:57

Analyses	Certs	AT	Result	MDL	RL	Qual	Units	DF	Analyzed
			Method: **SW-846 8082**						Analyst: **dl**
Polychlorinated Biphenyls									Prep Date/Time: **09/30/2014 08:07**
Aroclor 1016	cgk	A	***ND***	0.16	1.0		µg/Area	1	09/30/2014 17:58
Aroclor 1221	cgk	A	***ND***	0.35	1.0		µg/Area	1	09/30/2014 17:58
Aroclor 1232	cgk	A	***ND***	0.13	1.0		µg/Area	1	09/30/2014 17:58
Aroclor 1242	cgk	A	***6.4***	0.070	1.0		µg/Area	1	09/30/2014 17:58
Aroclor 1248	cgk	A	***ND***	0.040	1.0		µg/Area	1	09/30/2014 17:58
Aroclor 1254	cgk	A	***ND***	0.13	1.0		µg/Area	1	09/30/2014 17:58
Aroclor 1260	cgk	A	***ND***	0.19	1.0		µg/Area	1	09/30/2014 17:58
Aroclor 1262	k	A	***ND***	0.18	1.0		µg/Area	1	09/30/2014 17:58
Aroclor 1268	k	A	***ND***	0.25	1.0		µg/Area	1	09/30/2014 17:58
Surr: Decachlorobiphenyl		S	90.0		25.7-116		%REC	1	09/30/2014 17:58
Surr: Tetrachloro-m-xylene		S	85.0		39.7-130		%REC	1	09/30/2014 17:58
Total PCB's	k	A	***6.4***	1.0	1.0		µg/Area	1	09/30/2014 17:58

MICROBAC®

Analytical Results

Date: *Wednesday, October 1, 2014*

Client: Indiana Department of Environmental Management
Client Project: OL198 - OL204
Client Sample ID: #2
Sample Description:
Matrix: Wipe

Work Order/ID: 14I1235-02
Sampled: 09/26/2014 11:30
Received: 09/29/2014 14:57

Analyses	Certs	AT	Result	MDL	RL	Qual	Units	DF	Analyzed
			Method: **SW-846 8082**						Analyst: **dl**
Polychlorinated Biphenyls									Prep Date/Time: **09/30/2014 08:07**
Aroclor 1016	cgk	A	***ND***	16	100		µg/Area	100	10/01/2014 8:21
Aroclor 1221	cgk	A	***ND***	35	100		µg/Area	100	10/01/2014 8:21
Aroclor 1232	cgk	A	***ND***	13	100		µg/Area	100	10/01/2014 8:21
Aroclor 1242	cgk	A	***2100***	7.0	100		µg/Area	100	10/01/2014 8:21
Aroclor 1248	cgk	A	***ND***	4.0	100		µg/Area	100	10/01/2014 8:21
Aroclor 1254	cgk	A	***ND***	13	100		µg/Area	100	10/01/2014 8:21
Aroclor 1260	cgk	A	***ND***	19	100		µg/Area	100	10/01/2014 8:21
Aroclor 1262	k	A	***ND***	18	100		µg/Area	100	10/01/2014 8:21
Aroclor 1268	k	A	***ND***	25	100		µg/Area	100	10/01/2014 8:21
Surr: Decachlorobiphenyl		S	1000		25.7-116	DSS	%REC	100	10/01/2014 8:21
Surr: Tetrachloro-m-xylene		S			39.7-130	DS	%REC	100	10/01/2014 8:21
Total PCB's	k	A	***2100***	100	100		µg/Area	100	10/01/2014 8:21

MICROBAC®

Analytical Results

Date: *Wednesday, October 1, 2014*

Client: Indiana Department of Environmental Management
Client Project: OL198 - OL204
Client Sample ID: #3
Sample Description:
Matrix: Wipe

Work Order/ID: 14I1235-03
Sampled: 09/26/2014 11:34
Received: 09/29/2014 14:57

Analyses	Certs	AT	Result	MDL	RL	Qual	Units	DF	Analyzed
			Method: **SW-846 8082**						Analyst: **dl**
Polychlorinated Biphenyls									Prep Date/Time: **09/30/2014 08:07**
Aroclor 1016	cgk	A	***ND***	0.16	1.0		µg/Area	1	09/30/2014 18:35
Aroclor 1221	cgk	A	***ND***	0.35	1.0		µg/Area	1	09/30/2014 18:35
Aroclor 1232	cgk	A	***ND***	0.13	1.0		µg/Area	1	09/30/2014 18:35
Aroclor 1242	cgk	A	***ND***	0.070	1.0		µg/Area	1	09/30/2014 18:35
Aroclor 1248	cgk	A	***ND***	0.040	1.0		µg/Area	1	09/30/2014 18:35
Aroclor 1254	cgk	A	***ND***	0.13	1.0		µg/Area	1	09/30/2014 18:35
Aroclor 1260	cgk	A	***ND***	0.19	1.0		µg/Area	1	09/30/2014 18:35
Aroclor 1262	k	A	***ND***	0.18	1.0		µg/Area	1	09/30/2014 18:35
Aroclor 1268	k	A	***ND***	0.25	1.0		µg/Area	1	09/30/2014 18:35
Surr: Decachlorobiphenyl		S	95.0		25.7-116		%REC	1	09/30/2014 18:35
Surr: Tetrachloro-m-xylene		S	85.0		39.7-130		%REC	1	09/30/2014 18:35
Total PCB's	k	A	***ND***	1.0	1.0		µg/Area	1	09/30/2014 18:35

MICROBAC®

Analytical Results

Date: *Wednesday, October 1, 2014*

Client: Indiana Department of Environmental Management
Client Project: OL198 - OL204

Client Sample ID: #4
Sample Description:
Matrix: Wipe

Work Order/ID: 14I1235-04
Sampled: 09/26/2014 11:38
Received: 09/29/2014 14:57

Analyses	Certs	AT	Result	MDL	RL	Qual	Units	DF	Analyzed
			Method: SW-846 8082						Analyst: dl
Polychlorinated Biphenyls									Prep Date/Time: 09/30/2014 08:07
Aroclor 1016	cgk	A	ND	0.16	1.0		µg/Area	1	09/30/2014 18:53
Aroclor 1221	cgk	A	ND	0.35	1.0		µg/Area	1	09/30/2014 18:53
Aroclor 1232	cgk	A	ND	0.13	1.0		µg/Area	1	09/30/2014 18:53
Aroclor 1242	cgk	A	ND	0.070	1.0		µg/Area	1	09/30/2014 18:53
Aroclor 1248	cgk	A	ND	0.040	1.0		µg/Area	1	09/30/2014 18:53
Aroclor 1254	cgk	A	ND	0.13	1.0		µg/Area	1	09/30/2014 18:53
Aroclor 1260	cgk	A	ND	0.19	1.0		µg/Area	1	09/30/2014 18:53
Aroclor 1262	k	A	ND	0.18	1.0		µg/Area	1	09/30/2014 18:53
Aroclor 1268	k	A	ND	0.25	1.0		µg/Area	1	09/30/2014 18:53
Surr: Decachlorobiphenyl		S	75.0		25.7-116		%REC	1	09/30/2014 18:53
Surr: Tetrachloro-m-xylene		S	85.0		39.7-130		%REC	1	09/30/2014 18:53
Total PCB's	k	A	ND	1.0	1.0		µg/Area	1	09/30/2014 18:53

MICROBAC®

Analytical Results

Date: *Wednesday, October 1, 2014*

Client: Indiana Department of Environmental Management
Client Project: OL198 - OL204
Client Sample ID: #5
Sample Description:
Matrix: Wipe

Work Order/ID: 14I1235-05
Sampled: 09/26/2014 11:40
Received: 09/29/2014 14:57

Analyses	Certs	AT	Result	MDL	RL	Qual	Units	DF	Analyzed
			Method: SW-846 8082						Analyst: dl
Polychlorinated Biphenyls									Prep Date/Time: 09/30/2014 08:07
Aroclor 1016	cgk	A	ND	0.16	1.0		µg/Area	1	09/30/2014 19:12
Aroclor 1221	cgk	A	ND	0.35	1.0		µg/Area	1	09/30/2014 19:12
Aroclor 1232	cgk	A	ND	0.13	1.0		µg/Area	1	09/30/2014 19:12
Aroclor 1242	cgk	A	ND	0.070	1.0		µg/Area	1	09/30/2014 19:12
Aroclor 1248	cgk	A	ND	0.040	1.0		µg/Area	1	09/30/2014 19:12
Aroclor 1254	cgk	A	ND	0.13	1.0		µg/Area	1	09/30/2014 19:12
Aroclor 1260	cgk	A	ND	0.19	1.0		µg/Area	1	09/30/2014 19:12
Aroclor 1262	k	A	ND	0.18	1.0		µg/Area	1	09/30/2014 19:12
Aroclor 1268	k	A	ND	0.25	1.0		µg/Area	1	09/30/2014 19:12
Surr: Decachlorobiphenyl		S	75.0		25.7-116		%REC	1	09/30/2014 19:12
Surr: Tetrachloro-m-xylene		S	85.0		39.7-130		%REC	1	09/30/2014 19:12
Total PCB's	k	A	ND	1.0	1.0		µg/Area	1	09/30/2014 19:12

MICROBAC

Analytical Results

Date: *Wednesday, October 1, 2014*

Client:	Indiana Department of Environmental Management		
Client Project:	OL198 - OL204		
Client Sample ID:	#6	**Work Order/ID:**	14I1235-06
Sample Description:		**Sampled:**	09/26/2014 11:42
Matrix:	Wipe	**Received:**	09/29/2014 14:57

Analyses	Certs	AT	Result	MDL	RL	Qual	Units	DF	Analyzed
			Method: SW-846 8082						Analyst: dl
Polychlorinated Biphenyls									Prep Date/Time: 09/30/2014 08:07
Aroclor 1016	cgk	A	ND	0.16	1.0		µg/Area	1	09/30/2014 19:31
Aroclor 1221	cgk	A	ND	0.35	1.0		µg/Area	1	09/30/2014 19:31
Aroclor 1232	cgk	A	ND	0.13	1.0		µg/Area	1	09/30/2014 19:31
Aroclor 1242	cgk	A	ND	0.070	1.0		µg/Area	1	09/30/2014 19:31
Aroclor 1248	cgk	A	ND	0.040	1.0		µg/Area	1	09/30/2014 19:31
Aroclor 1254	cgk	A	ND	0.13	1.0		µg/Area	1	09/30/2014 19:31
Aroclor 1260	cgk	A	ND	0.19	1.0		µg/Area	1	09/30/2014 19:31
Aroclor 1262	k	A	ND	0.18	1.0		µg/Area	1	09/30/2014 19:31
Aroclor 1268	k	A	ND	0.25	1.0		µg/Area	1	09/30/2014 19:31
Surr: Decachlorobiphenyl		S	85.0		25.7-116		%REC	1	09/30/2014 19:31
Surr: Tetrachloro-m-xylene		S	90.0		39.7-130		%REC	1	09/30/2014 19:31
Total PCB's	k	A	ND	1.0	1.0		µg/Area	1	09/30/2014 19:31

MICROBAC

Analytical Results

Date: *Wednesday, October 1, 2014*

Client: Indiana Department of Environmental Management
Client Project: OL198 - OL204
Client Sample ID: #7
Sample Description:
Matrix: Wipe

Work Order/ID: 14I1235-07
Sampled: 09/26/2014 11:47
Received: 09/29/2014 14:57

Analyses	Certs	AT	Result	MDL	RL	Qual	Units	DF	Analyzed
			Method: **SW-846 8082**						Analyst: **dl**
Polychlorinated Biphenyls									Prep Date/Time: **09/30/2014 08:07**
Aroclor 1016	cgk	A	***ND***	0.16	1.0		µg/Area	1	09/30/2014 19:49
Aroclor 1221	cgk	A	***ND***	0.35	1.0		µg/Area	1	09/30/2014 19:49
Aroclor 1232	cgk	A	***ND***	0.13	1.0		µg/Area	1	09/30/2014 19:49
Aroclor 1242	cgk	A	***ND***	0.070	1.0		µg/Area	1	09/30/2014 19:49
Aroclor 1248	cgk	A	***ND***	0.040	1.0		µg/Area	1	09/30/2014 19:49
Aroclor 1254	cgk	A	***ND***	0.13	1.0		µg/Area	1	09/30/2014 19:49
Aroclor 1260	cgk	A	***ND***	0.19	1.0		µg/Area	1	09/30/2014 19:49
Aroclor 1262	k	A	***ND***	0.18	1.0		µg/Area	1	09/30/2014 19:49
Aroclor 1268	k	A	***ND***	0.25	1.0		µg/Area	1	09/30/2014 19:49
Surr: Decachlorobiphenyl		S	90.0		25.7-116		%REC	1	09/30/2014 19:49
Surr: Tetrachloro-m-xylene		S	90.0		39.7-130		%REC	1	09/30/2014 19:49
Total PCB's	k	A	***ND***	1.0	1.0		µg/Area	1	09/30/2014 19:49

FLAGS, FOOTNOTES AND ABBREVIATIONS (as needed)

B = Detected in the associated method Blank at a concentration above the routine RL
b- = Detected in the associated method Blank at a concentration greater than 2.2 times the MDL
b* = Detected in the associated method Blank at a concentration greater than half the RL
CFU = Colony forming units
D = Dilution performed on sample
DF = Dilution Factor
g = Gram
E = Value above quantitation range
H = Analyte was prepared and/or analyzed outside of the analytical method holding time
I = Matrix Interference
J = Analyte concentration detected between RL and MDL (Metals / Organics)
LOD = Limit of Detection
m3 = Meters cubed
MDL = Method Detection Limit
mg/Kg = Milligrams per Kilogram (ppm)
mg/L = Milligrams per Liter (ppm)
NA = Not Analyzed
ND = Not Detected at the Reporting Limit (or the Method Detection Limit, if used)
NR = Not Recovered
R = RPD outside accepted recovery limits
RL = Reporting Limit
S = Spike recovery outside recovery limits
Surr = Surrogate
U = Undetected
> = Greater than
< = Less than
% = Percent

ANALYTE TYPES: (AT)

A,B = Target Analyte
I = Internal Standard
M = Summation Analyte
S = Surrogate
T = Tentatively Identified Compound (TIC, concentration estimated)

QC SAMPLE IDENTIFICATIONS

BLK = Method Blank
DUP = Method Duplicate
BS = Method Blank Spike
MS = Matrix Spike
ICB = Initial Calibration Blank
CCB = Continuing Calibration Blank
CRL = Client Required Reporting Limit
PDS = Post Digestion Spike
QCS = Quality Control Standard
ICSA = Interference Check Standard "A"
ICSAB = Interference Check Standard "AB"
BSD = Method Blank Spike Duplicate
MSD = Matrix Spike Duplicate
ICV = Initial Calibration Verification
CCV = Continuing Calibration Verification
OPR = Ongoing Precision and Recovery Standard
SD = Serial Dilution

CERTIFICATIONS (Certs)

Below is a list of certifications maintained by the Microbac Merrillville Laboratory. All data included in this report has been reviewed for and meets all project specific and quality control requirements of the applicable accreditation, unless otherwise noted. Complete lists of individual analytes pursuant to each certification below are available upon request.

a The American Association for Laboratory Accreditation [A2LA] for Biological Testing, ISO/IEC 17025 (Certificate# 3045.01)
b The American Association for Laboratory Accreditation [A2LA] for Environmental Department of Defense Testing, ISO/IEC 17025 (Certificate# 3045.02)
c Illinois EPA for the analysis wastewater and solid waste in accordance with the requirements of the National Environmental Laboratory Accreditation Program [NELAP] (accreditation #200064)
d Illinois Department of Public Health for the microbiological analysis of drinking water (registry #1755266)
- Indiana DEM approved support laboratory for solid waste and wastewater analyses
e Indiana SDH for the chemical analysis of drinking water (lab #C-45-03)
f Indiana SDH for the microbiological analysis of drinking water (lab #M-45-8)
g Kansas Department of Health and Environment for the analysis of drinking water, wastewater, and solid hazardous waste in accordance with the requirements of the National Environmental Laboratory Accreditation Program [NELAP] (Certificate No. E-10397)
h Kentucky EPPC for the analysis of samples applicable to the Underground Storage Tank program (lab #75)
i New York SDOH in accordance with the requirements of the National Environmental Laboratory Accreditation Program [NELAP] (Lab#12006;accreditation #49179)
j New York SDOH in accordance with the requirements of the National Environmental Laboratory Accreditation Program [NELAP] (Lab# 12006; accreditation #49386)
k North Carolina DENR for the environmental analysis for NPDES effluent, surface water, groundwater, and pretreatment regulations(certificate #597)
l Pennsylvania Department of Environmental Protection [NELAP] (Lab# 68-04863)
m Washington State Department of Ecology in accordance to Ch. 173-50 WAC (lab #C992)
n Wisconsin DNR for the chemical analysis of wastewater and solid waste (lab #998036710)

MICROBAC

COOLER INSPECTION

Date: Wednesday, October 1, 2014

Client Name: Indiana Department of Environmental Management

Date/Time Received: 09/29/2014 14:57

Work Order Number: 14I1235

Received by: Karen Ziolkowski

Checklist completed by: 9/29/2014 3:16:00PM | James Meyer

Reviewed by: 9/30/2014 | KG

Carrier Name: Microbac

Cooler ID: Default Cooler

Container/Temp Blank Temperature: 4.6° C

After-Hour Arrival?	Yes	☐	No	☑		
Shipping container/cooler in good condition?	Yes	☑	No	☐	Not Present	☐
Custody seals intact on shipping container/cooler?	Yes	☐	No	☐	Not Present	☑
Custody seals intact on sample containers?	Yes	☐	No	☐	Not Present	☑
COC present?	Yes	☑	No	☐		
COC included sufficient client identification?	Yes	☑	No	☐		
COC included sufficient sample collector information?	Yes	☑	No	☐		
COC included a sample description?	Yes	☑	No	☐		
COC agrees with sample labels?	Yes	☑	No	☐		
COC identified the appropriate matrix?	Yes	☑	No	☐		
COC included date of collection?	Yes	☑	No	☐		
COC included time of collection?	Yes	☑	No	☐		
COC identified the appropriate number of containers?	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	☐		
If the samples are preserved, are the preservatives identified?	Yes	☑	No	☐		

If No, adjusted by? _____

COC included the requested analyses?	Yes	☑	No	☐		
COC signed when relinquished and received?	Yes	☑	No	☐		
Samples received on ice?	Yes	☑	No	☐		
Samples properly preserved?	Yes	☑	No	☐		
Voa vials for aqueous samples have zero headspace?	Yes	☐	No	☐	No VOA vials submitted	☑

Cooler Comments:

ANY "NO" EVALUATION (excluding After-Hour Receipt) REQUIRES CLIENT NOTIFICATION.

Sample ID	Client Sample ID	Comments
14I1235-01	#1	ICOC Required
14I1235-02	#2	ICOC Required
14I1235-03	#3	ICOC Required
14I1235-04	#4	ICOC Required
14I1235-05	#5	ICOC Required
14I1235-06	#6	ICOC Required
14I1235-07	#7	ICOC Required

SAMPLE CUSTODY CHAIN - IDEM OFFICE OF LAND QUALITY

State Form 42091 (R2/10-06)

Please Send Report to:
IDEM
OLQ Chemistry Section
Attn: QA Officer
MC 66-20 IGCN N1101
100 N Senate Avenue
Indianapolis, IN 46204-2251
www.idem.IN.gov

(1) SAMPLE CERTIFICATION - I certify the following samples were collected by me or in my presence:

Print Name: George Ritchotte

Sample Date(s): September 26, 2014

Signature: George Ritchotte

(2A-2C) SAMPLE INFORMATION			(2D) COUNTS				(2E-2F) ANALYSES REQUESTED	(2G) COMMENTS	(2H-2J) DATE & TIME			
Laboratory Control Number (Lab Use)	IDEM Sample Number	Matrix or Sample Type	Glass Bottles	Plastic Bottles	40 ml Vials	Other	Total PCBs	14I1235	Date	Time	AM	PM
-01	#1	PCB wipe				✓	✓		9/26/14	11:26	✓	
-02	#2	" "				✓	✓		9/26/14	11:30	✓	
-03	#3	" "				✓	✓		9/26/14	11:34	✓	
-04	#4	" "				✓	✓		9/26/14	11:38	✓	
-05	#5	" "				✓	✓		9/26/14	11:40	✓	
-06	#6	" "				✓	✓		9/26/14	11:42	✓	
-07	#7	" "				✓	✓		9/26/14	11:47	✓	

14I1235 Kristen Gehlbach IDEM - Indianapolis, IN IDEM TESTING 08/29/2014

REQUIRED TURNAROUND TIME (with full documentation)

30 days | 14 days | 7 days | 2 days

COMMENTS

FOR LABORATORY USE ONLY:

Temp: 4.5 + 0.1 = 4.6° oz

Sample Condition:

(5) TRANSFER OF CUSTODY - I certify that I received the above samples.

	Sign	Date	Time
Relinquished by:	George A. Ritchotte	9/26/14	1415
Received by:	Kristen Gehlbach		AM / PM
Relinquished by:	Kristen Gehlbach	9/30/14	1235
Received by:			AM / PM

(6) LABORATORY RECEIPT OF SAMPLES

I certify that I received the above samples. After recording these samples in the official logbook, they will remain in the custody of competent lab personnel or be secured in a locked area at all times. 9/-

	Sign	Date	Time
Received by:	9/29/14 1335 1457		
Laboratory:			
Address:		9/29/14	1457 AM / PM

10/06 Revision

(7) DISTRIBUTION: PINK COPY - IDEM Sampler YELLOW COPY - Lab (Keep) WHITE COPY - Lab (To be Returned to IDEM with Data Package)

ALS Environmental

07-Oct-2014

Keith Hughes
QEPI, Inc.
1611 S. Franklin Road
Indianapolis, IN 46239

Tel: (618) 922-9985
Fax: (317) 351-4265

Re: Anderson Preparatory School Work Order: **1410111**

Dear Keith,

ALS Environmental received 4 samples on 03-Oct-2014 08:38 AM for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested.

QC sample results for this data met laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from ALS Laboratory Group. Samples will be disposed in 30 days unless storage arrangements are made.

The total number of pages in this report is 7.

If you have any questions regarding this report, please feel free to contact me.

Sincerely,

Rob Nieman

Electronically approved by: Rob Nieman

Rob Nieman
Project Manager

ALS Environmental

Date: 07-Oct-14

Client: QEPI, Inc.
Project: Anderson Preparatory School
Work Order: **1410111**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
1410111-01	APS-ROOM2A-141002	Air		10/2/2014	10/3/2014 08:38	☐
1410111-02	APS-ROOM2B-141002	Air		10/2/2014	10/3/2014 08:38	☐
1410111-03	APS-ROOMHW-141002	Air		10/2/2014	10/3/2014 08:38	☐
1410111-04	APS-ROOM10-141002	Air		10/2/2014	10/3/2014 08:38	☐

ALS Environmental

Date: *07-Oct-14*

Client: QEPI, Inc.
Project: Anderson Preparatory School

Work Order: 1410111

Analytical Results

Lab ID: 1410111-01A
Client Sample ID: APS-ROOM2A-141002

Collection Date: 10/2/2014
Matrix: AIR

Analyses

PCBS BY EPA TO-10		Method: ETO10A	Air Volume (L): 6900	Analyst: SAD
Date Analyzed: 10/7/2014	µg/sample	Reporting Limit µg/sample	mg/m3	
Aroclor 1016	ND	0.25	<0.000036	
Aroclor 1221	ND	0.25	<0.000036	
Aroclor 1232	ND	0.25	<0.000036	
Aroclor 1242	**0.68**	**0.25**	**0.000099**	
Aroclor 1248	ND	0.25	<0.000036	
Aroclor 1254	ND	0.25	<0.000036	
Aroclor 1260	ND	0.25	<0.000036	

Lab ID: 1410111-02A
Client Sample ID: APS-ROOM2B-141002

Collection Date: 10/2/2014
Matrix: AIR

Analyses

PCBS BY EPA TO-10		Method: ETO10A	Air Volume (L): 6900	Analyst: SAD
Date Analyzed: 10/7/2014	µg/sample	Reporting Limit µg/sample	mg/m3	
Aroclor 1016	ND	0.25	<0.000036	
Aroclor 1221	ND	0.25	<0.000036	
Aroclor 1232	ND	0.25	<0.000036	
Aroclor 1242	**0.65**	**0.25**	**0.000095**	
Aroclor 1248	ND	0.25	<0.000036	
Aroclor 1254	ND	0.25	<0.000036	
Aroclor 1260	ND	0.25	<0.000036	

Note:

Client: QEPI, Inc.
Project: Anderson Preparatory School

Work Order: 1410111

Analytical Results

Lab ID: 1410111-03A
Client Sample ID: APS-ROOMHW-141002

Collection Date: 10/2/2014
Matrix: AIR

Analyses

PCBS BY EPA TO-10		Method: ETO10A	Air Volume (L): 6900	Analyst: SAD
Date Analyzed: 10/7/2014	µg/sample	Reporting Limit µg/sample	mg/m3	
Aroclor 1016	ND	0.25	<0.000036	
Aroclor 1221	ND	0.25	<0.000036	
Aroclor 1232	ND	0.25	<0.000036	
Aroclor 1242	**1.4**	**0.25**	**0.00021**	
Aroclor 1248	ND	0.25	<0.000036	
Aroclor 1254	ND	0.25	<0.000036	
Aroclor 1260	ND	0.25	<0.000036	

Lab ID: 1410111-04A
Client Sample ID: APS-ROOM10-141002

Collection Date: 10/2/2014
Matrix: AIR

Analyses

PCBS BY EPA TO-10		Method: ETO10A	Air Volume (L): 6825	Analyst: SAD
Date Analyzed: 10/7/2014	µg/sample	Reporting Limit µg/sample	mg/m3	
Aroclor 1016	ND	0.25	<0.000037	
Aroclor 1221	ND	0.25	<0.000037	
Aroclor 1232	ND	0.25	<0.000037	
Aroclor 1242	**0.58**	**0.25**	**0.000085**	
Aroclor 1248	ND	0.25	<0.000037	
Aroclor 1254	ND	0.25	<0.000037	
Aroclor 1260	ND	0.25	<0.000037	

Note:

ALS Environmental

Date: 07-Oct-14

Client: QEPI, Inc.

Work Order: 1410111

Project: Anderson Preparatory School

QC BATCH REPORT

Batch ID: **24636** Instrument ID: **GC3** Method: **ETO10A**

MBLK Sample ID: **MBLK-24636-24636** Units: **µg/sample** Analysis Date: **10/7/2014**

Client ID: Run ID: **GC3_141007A** SeqNo: **922773** Prep Date: **10/6/2014** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Aroclor 1016	ND	0.25								
Aroclor 1221	ND	0.25								
Aroclor 1232	ND	0.25								
Aroclor 1242	ND	0.25								
Aroclor 1248	ND	0.25								
Aroclor 1254	ND	0.25								
Aroclor 1260	ND	0.25								
Surr: Decachlorobiphenyl	0.254	0	*0.05*	0	*508*		0			
Surr: Tetrachloro-m-xylene	0.25	0	*0.05*	0	*500*		0			

LCS Sample ID: **LCS-24636-24636** Units: **µg/sample** Analysis Date: **10/7/2014**

Client ID: Run ID: **GC3_141007A** SeqNo: **922774** Prep Date: **10/6/2014** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Aroclor 1260	4.768	0.25	5	0	95.4	70-130	0			
Surr: Decachlorobiphenyl	0.2355	0	*0.05*	0	*471*		0			
Surr: Tetrachloro-m-xylene	0.2265	0	*0.05*	0	*453*		0			

The following samples were analyzed in this batch:

1410111-01A 1410111-02A 1410111-03A
1410111-04A

Note: See Qualifiers Page for a list of Qualifiers and their explanation.

Client: QEPI, Inc.
Project: Anderson Preparatory School
WorkOrder: 1410111

QUALIFIERS, ACRONYMS, UNITS

Qualifier	Description
*	Value exceeds Regulatory Limit
a	Not accredited
B	Analyte detected in the associated Method Blank above the Reporting Limit
E	Value above quantitation range
H	Analyzed outside of Holding Time
J	Analyte detected below quantitation limit
n	Not offered for accreditation
ND	Not Detected at the Reporting Limit
O	Sample amount is > 4 times amount spiked
P	Dual Column results percent difference > 40%
R	RPD above laboratory control limit
S	Spike Recovery outside laboratory control limits
U	Analyzed but not detected above the MDL

Acronym	Description
DUP	Method Duplicate
E	EPA Method
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitaion Limit
SDL	Sample Detection Limit
SW	SW-846 Method

Units Reported	Description
µg/sample	

ALS Environmental

Sample Receipt Checklist

Client Name: QEPI - INDIANAPOLIS Date/Time Received: 03-Oct-14 08:38

Work Order: 1410111 Received by: RDN

Checklist completed by: Rob Nieman (eSignature) 03-Oct-14 (Date) Reviewed by: Rob Nieman (eSignature) 03-Oct-14 (Date)

Matrices:

Carrier name: FedEx

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	Not Present ☑
Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
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 ☐	
Container/Temp Blank temperature in compliance?	Yes ☐	No ☑	
Temperature(s)/Thermometer(s):	19.3		
Cooler(s)/Kit(s):			
Water - VOA vials have zero headspace?	Yes ☐	No ☐	No VOA vials submitted ☐
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☐
pH adjusted?	Yes ☐	No ☐	N/A ☐
pH adjusted by:			

Login Notes:

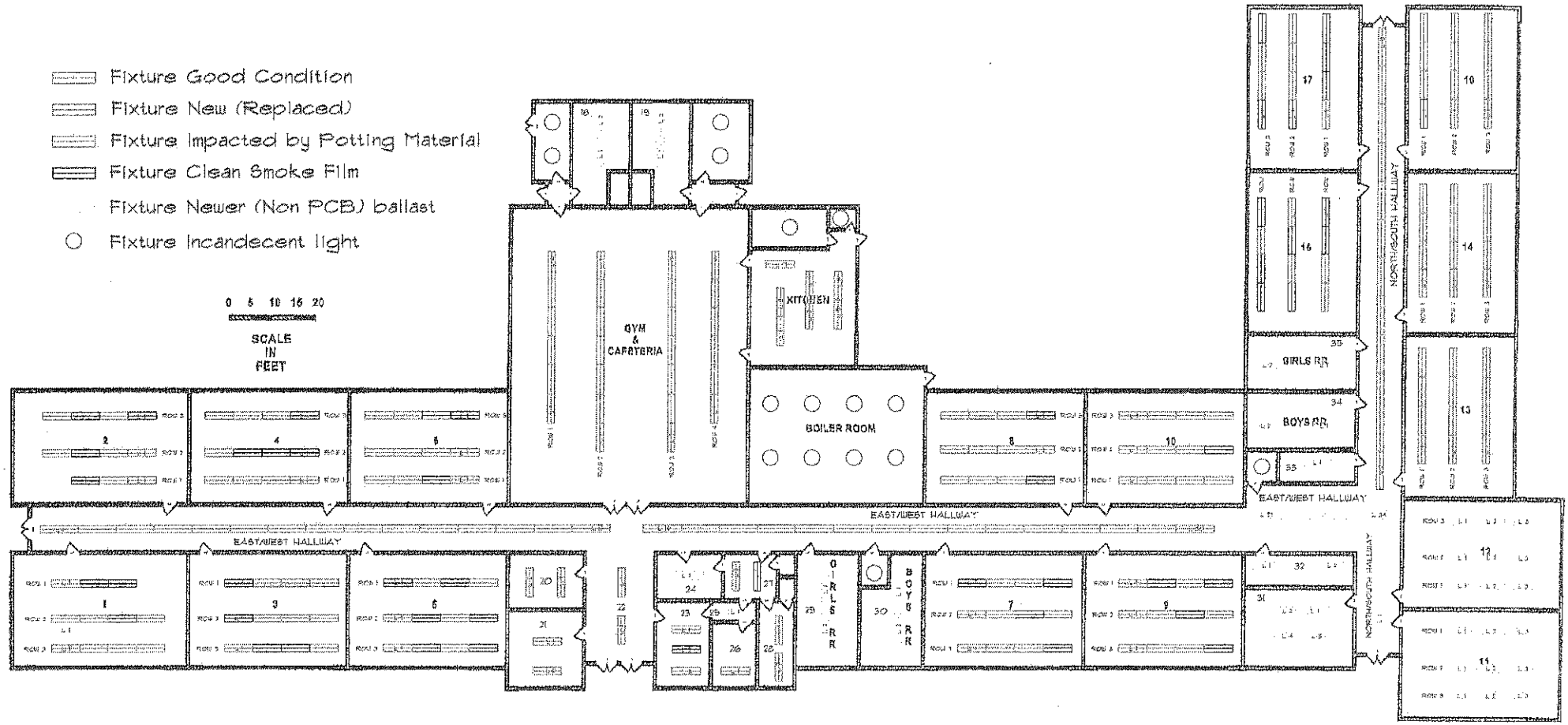
Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

CorrectiveAction:

APPENDIX C
AFFECTED FIXTURES


Fixture Good Condition
Fixture New (Replaced)
Fixture Impacted by Potting Material
Fixture Clean Smoke Film
Fixture Newer (Non PCB) ballast
Fixture Incandecent light
0 5 10 15 20
SCALE IN FEET
GYM & CAFETERIA
KITCHEN
BOILER ROOM
GIRLS RR
BOYS RR
EAST/WEST HALLWAY
NORTH/SOUTH HALLWAY

Anderson Preparatory Academy
25th Street Elementary
PCB Materials Inventory and Quantification Chart

Room ID	8' Light Fixture Potting Material Impact	8' Light Fixture Smoke Damaged	8" Fixtures Total Count	8' Fluorescent Bulb	4' Fluorescent Bulb	PCB Ballast
1	7	3	11	22	0	7
2	4	4	9	18	0	7
3	4	4	12	24	0	9
4	5	4	11	22	0	7
5	5	6	11	22	0	9
6	9	2	12	24	0	7
7	7	4	12	24	0	9
8	7	2	12	24	0	9
9	7	4	12	24	0	9
10	11	1	12	24	0	9
11	0	0	0	0	0	0
12	0	0	0	0	0	0
13	10	0	12	0	48	8
14	11	0	12	0	48	9
15	5	7	12	0	48	7
16	9	1	12	0	48	9
17	6	6	12	0	48	10
18	0	0	0	0	0	0
19	0	0	0	0	0	0
20	0	0	0	0	0	0
21	1	0	2	0	4	2
22	1	0	2	0	8	4
23	1	1	3	6	0	3
24	0	0	0	0	0	0
25	0	0	1	2	0	0
26	0	0	1	2	0	1
27	1	1	2	4	0	2
28	2	0	2	4	0	2
29	0	0	0	0	0	0
30	0	0	0	0	0	0
31	0	0	0	0	0	0
32	0	0	0	0	0	0
33	0	0	0	0	0	0
34	0	0	0	0	0	0
35	0	0	0	0	0	0
Boiler Room	0	0	0	0	0	0
Gymnasium	0	0	26	52	0	11
Kitchen	6	0	6	12	0	3
East/West Hallway	30	0	30	0	120	50
North/South Hallway	12	0	12	12	0	10
Total Quantities:	**161**	**50**	**261**	**322**	**372**	**213**