

CORRECTIVE ACTION WORKPLAN

***Recovery School District
Booker T. Washington High School
1201 South Roman Street
New Orleans, Orleans Parish, Louisiana***

Agency Interest ID No. 36659

CB&I Project No. 149184

January 2014

Prepared for:

Recovery School District
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Acronyms and Abbreviations

AOI	Area of Investigation
BMP	Best Management Practice
ft-bgs	feet below ground surface
CAP	Corrective Action Workplan
COC	Constituent of Concern
GW _{3NDW}	Groundwater 3 Non-Drinking Water
HASP	Health and Safety Plan
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MO-1	Management Option 1
NGVD	National Geodetic Vertical Datum
LRS	Limiting RECAP Standard
QA/QC	Quality Assurance/Quality Control
RECAP	Risk Evaluation/Corrective Action Program
RS	RECAP Standard
RSD	Louisiana Recovery School District
ft ²	square feet
SMP	Soil Management Plan
SO	Screening Option
SQL	Sample Quantification Limits
SS	Screening Standards
SWPPP	Stormwater Pollution Prevention Program
TCLP	Toxicity Characteristic Leaching Procedure
USGS	United States Geological Survey

1.0 Introduction

This Corrective Action Workplan has been prepared for the Louisiana Recovery School District (RSD), to address remedial actions for an area of impacted soil at the former Booker T. Washington High School site located at 1201 South Roman Street, in New Orleans, Orleans Parish, Louisiana as shown on Figure 1. The Louisiana Recovery School District is planning to rebuild Booker T. Washington High School on the former site, most of which was demolished in 2013. To support the plans to rebuild the school, several environmental investigations were completed at the site to assess the nature and extent of potential impact to soil and groundwater to determine the need for remedial actions. A risk-based evaluation of the site was completed in August 2013 in accordance with the Louisiana Department of Environmental Quality's (LDEQ's) Risk Evaluation/Corrective Action Program (RECAP). The results of the evaluation were documented in a *Site Investigation and Risk Evaluation/Corrective Action Program (RECAP) Report* (dated August 2013), which indicated that numerous constituents in surface soil (0-15 feet) exhibited concentrations that exceeded the risk-based standards developed for the site.

Based on the results of the site investigations and RECAP evaluation, representatives of CB&I Government Solutions, Inc. (CB&I), formerly Shaw Environmental & Infrastructure, Inc., and RSD (Jacobs/CSRS) met with the LDEQ on August 7, 2013 to review the Site conditions and confer with LDEQ to determine the options for the best approach to adequately address the areas of impact that exceed the final Limiting RECAP Standard (LRS) and the potential exposure pathways and receptors for the intended future development of the property. Based on feedback from the LDEQ, it was agreed that future remedial options should include active remediation (source removal) as well as engineering and/or institutional controls to manage potential exposure pathways and potential receptors with respect to the intended future development of the property as a school.

In correspondence dated November 1, 2013, the LDEQ requested a Corrective Action Workplan (CAP) be submitted to outline the remedial actions to be implemented at the site. A copy of the letter is included in Appendix A.

2.0 Site Description

The subject site is approximately 4.3-acres (Figure 1), located at 1201 South Roman Street in New Orleans, Louisiana. The surrounding land use, cross streets, and adjoining properties are presented on Figure 2.

The site is rectangular in shape and the topography is generally flat with surface drainage along South Roman Street, Earhart Boulevard, and Erato Street. As noted, the site is the location of the former Booker T. Washington High School. The former school was reportedly constructed in the early 1940s and was in continuous operation until it was closed in August 2005 due to storm damage from Hurricane Katrina. Currently, there are only two structures on the site: the auditorium building on the north side of the site adjacent to Earhart Boulevard and a stairwell structure on the east side of the site adjacent to South Roman Street. Concrete foundations and paved parking areas also remain in place over the majority of the site and as shown on Figure 3; other structures on the site have been demolished. The site is surrounded by a locked security fence to prevent public access.

Based on limited historical records, the site was reportedly used as a city dump, known as the “Silver City Dump”, prior to the construction of the school. Boring logs from previous investigations at the site confirm the presence of debris beneath the site that extends from near the ground surface to a maximum depth of approximately 10 to 12 feet below grade. Based on historical information available through the LDEQ, the former dump is believed to extend several blocks north of the Booker T. Washington site. Based on a 1939 USGS 7.5 Minute Topographic Quadrangle entitled New Orleans East, an area of elevated topography existed approximately one block northwest of Claiborne Avenue to five blocks northwest of Claiborne Avenue parallel to Calliope Street (now Earhart Boulevard). The area of soil impact identified at the former Booker T. Washington site is located within the subsurface interval of the former city dump. Geologic cross-sections showing the extent of the debris beneath the site are presented on Figure 4.

3.0 Pertinent Site Background Information

3.1 Area of Investigation (AOI)

The results of the RECAP evaluation documented in the August 2013 *Site Investigation and Risk Evaluation/Corrective Action Program (RECAP) Report* and previous investigations indicated soil and groundwater exhibited constituent concentrations that exceeded the LDEQ RECAP Screening Option (SO) Screening Standards (SS). Further evaluation of these constituents under RECAP Management Option 1 (MO-1) indicated none of the constituent concentrations in groundwater exceeded the MO-1 Limiting RECAP Standard (LRS) for a residential site; however, several metal constituents in surface soil (0-15 feet) exhibited detected constituent concentrations that exceeded the MO-1 LRS developed for the site. The constituents and sample locations that exceeded the final MO-1 RECAP standards are located at depths ranging from near the ground surface to approximately 10 feet below ground surface and are present across the majority of the site. The extent of the impact is believed to be directly related to the former use of the property. A figure showing the locations of the soil samples that exceeded the MO-1 LRS is shown on Figure 5.

3.2 Constituents of Concern (COC)

Based on the results of the August 2013 RECAP evaluation, the constituents of concern (COCs) at the site were identified as the constituents with concentrations that exceeded the RECAP MO-1 LRS developed for the site. None of the groundwater metal constituents (total or dissolved) exhibited detected concentrations or Sample Quantitation Limits (SQLs) that exceeded the groundwater LRS; however, six metals (antimony, arsenic, cadmium, lead, zinc, and mercury) exhibited detected concentrations that exceeded the surface soil LRS. The lateral and vertical distribution of these constituents in the surface soil/fill material across the site is presented on Figure 5.

3.3 Exposure Pathways

Exposure to the impacted soils/debris/fill material at the site may occur during the implementation of the proposed demolition/construction/remedial actions and in the future upon completion of the construction of a school on the Site. This CAP is focused on the potential exposures that may occur due to potential long term exposure to future students, school staff, and the public and potential short term exposure to industrial workers during the site development. The CAP also documents the measures being put in place to prevent and manage the potential for exposure once the school has been constructed and opened to the public.

During the implementation of the site development and remedial actions, potential exposure to the soil/fill material may occur during the following site development activities: demolition of current site surface and subsurface features (concrete foundations and paved parking areas, removal of existing utilities, etc); installation of new subsurface utilities; excavation and removal of existing impacted soil, placement of clean fill material, fill grading, and other related construction activities. The main concern for exposure during these activities is the direct contact with soil/fill material and/or exposure to dust generated by the construction activities. Specific construction practices and procedures will be implemented to manage the potential for exposure during these activities. These practices/procedures are discussed in more detail in Section 4.

4.0 Remedial Activities

The proposed remedial activities to be implemented at the site include limited active source removal, as well as engineering and institutional controls. This plan also identifies the construction activities that could result in potential exposure to industrial workers from impacted soil/fill material at the site. Generally, the planned construction and/or remedial activities include:

- Removal of existing concrete foundations and paved parking areas. This includes removal of one of the two basement structures that currently exist at the site.
- Removal of the existing foundation pile caps and upper portion of the existing piles to accommodate the excavation and removal of soil and later new construction.
- Excavation and removal of 3-feet of existing soil material across the entire site (excluding the areas beneath the existing buildings/structures that remain on the property followed by placement of a geotextile fabric at the bottom of the excavation.
- Management of the excavated soil/fill material, concrete/pavement, and related waste for characterization and proper disposal.
- Placement of approximately 3 or more feet of clean fill material at varying depths throughout the site depending on the final desired site elevations.
- Implementation of a site cap by construction of new concrete building slabs and concrete/asphalt parking lots and/or driveways. These features will include the installation of piles to support the foundations/structures and placement of approximately 3 feet of additional fill material beneath the new building foundations.

Additional pertinent details concerning the construction and remedial activities follow.

4.1 Initial Demolition Activities

Initial site work will include the demolition and removal from the property of concrete foundations, paved parking areas, and foundation pile caps and piles to a depth of 3 feet below existing ground surface with the exception of the one existing basement that will remain as identified on Figure 3. Concrete foundations and foundation-pile construction materials will be sampled and characterized for disposal. Once waste characterization is

complete, these materials will be removed and properly disposed offsite at an approved facility.

4.2 Source Removal and Fill Activities

The area where the constituents of concern are present on site has been identified as the Area of Investigation (AOI) and is illustrated on the site plan included in Figure 5. Once the building and foundation slabs and other paved areas are demolished, surface soil will be excavated to a depth of approximately 3 ft-bgs across the site for off-site disposal. Cross-sections illustrating the depth of the excavation and approximate elevation variances throughout the site are presented on Figure 4.

There are two areas at the site where previous building basements are located. The basement area near the center of the site will be removed to depths of approximately 14 feet below grade and backfilled to construction grade with clean fill material. The second basement area on the north side of the site will not be removed and is shown on Figure 3.

Soil will not be removed from beneath existing buildings.

Clean fill material needed to bring the site to construction grades will be obtained from an off-site borrow source. Approximately 3 feet of fill will be placed across the entire site (excluding the areas beneath/adjacent to the existing buildings). It is expected to be placed in lifts of 8 inches and 95% compaction. Future structures/buildings will be elevated with additional clean fill material to approximately 3 feet above existing grade (following the placement of 3 feet of fill material to grade as noted above).

4.3 Construction of Foundations and Paved Areas

New foundation piles will be driven beneath the areas of the new buildings. The design of the piles and depth of penetration is currently being designed by the civil and geotechnical engineers as contracted to RSD.

The site will be developed such that approximately 60% of the total area will be covered by structures/buildings, 30% by pavement (concrete and/or asphalt) and 10% by green space.

4.4 Exposure Pathway Control/Management

Soil management practices/procedures have been prepared in order to provide measures to manage and minimize potential exposure during implementation of the demolition/construction activities at the site. The planned remedial actions have been designed to control and manage potential exposure to the impacted soils (that will remain at depth of greater than 3 ft bgs) once the school has been constructed and is opened to

the public. Pertinent practices for management of the potential for exposure during demolition/construction and implementation of the remedial actions are as follows.

4.4.1 Exposure Management for Demolition/Construction Activities

During demolition/construction activities, potential exposure to impacted soil/fill material will be managed as follows:

Dust Suppression - During decommissioning and construction activities, the AOI shall be thoroughly wetted on a daily basis or more frequently if needed, to suppress dust and potential for airborne release. Wetting shall mean moistening the soil, but not saturation, so as to avoid tracking mud from the AOI to other areas of the site or onto public roadways.

If construction traffic through the AOI is necessary, then construction traffic channels shall be wetted on a more frequent basis, as necessary. Alternatively, placement of a covering of crushed stone or matting may also be considered to control dust or control tracking mud at the entrance/exit of the site.

Soil Management - Soils excavated from within the AOI that require removal from the site shall be stockpiled on top of, and covered with sheet plastic polyethylene with a minimum thickness of 6 millimeters (mil) or placed into dedicated, roll-off containers, or loaded directly into trucks for transport to the identified disposal facility. The excavated soil will be sampled and properly characterized prior to disposal.

Upon excavation of the top 3 feet of soil across the site, a geotextile fabric will be placed on the exposed surface and used as a base layer to separate the existing soils from the overlying clean fill material. The geotextile fabric will conform to Louisiana Department of Transportation and Development Class D in accordance with Section 1019 of the Louisiana Standard Specifications for Roads and Bridges, 2006 edition and latest revisions, or as amended herein. This fabric should be on a Louisiana Qualified Product List. Once in place, this fabric will help control the potential for generation of dust from site traffic and exist as a barrier. Should future intrusive work be required at the site, the geotextile fabric would indicate the boundary between the clean fill and the underlying soil/debris/fill from the former landfill.

Trenching may be required for the installation of subsurface utilities, like a sprinkler system or water service, in some areas of the site. Spoils generated during trenching operations will be stockpiled adjacent to the origin of excavation and returned to the immediate area, if suitable to maintain the 3 feet of clean fill above the landfill material, once the conduits have been installed. Excess spoils or unsuitable materials from the trenching operations will be characterized for off-site disposal.

Water Management – The Louisiana Pollutant Discharge Elimination System (LPDES) stormwater permit program requires operators of construction projects of one to five acres to obtain authorization to discharge stormwater under an LPDES stormwater permit for small construction sites (LAR200000). A Storm Water Pollution Prevention Program (SWPPP) must be developed for the site and will be described in further detail under a site specific Best Management Practices Plan (BMP).

Equipment Cleaning - Equipment used to excavate or handle soils within the AOI shall be properly cleaned prior to demobilization. At a minimum, equipment cleaning will consist of removal of excess impacted soils and removal of remaining impacted soils utilizing pressurized water and/or steam generation. All cleaning will be performed within the AOI in which the equipment was operating. All fluids/waste generated during the cleaning process will be contained and managed for off-site disposal.

Adherence to Health and Safety Plans – Site-specific Health and Safety Plans (HASPs) will be developed for conducting the demolition/construction, remediation, and related site activities. It is expected that each Louisiana Recovery School District contractor will develop and implement their own site specific HASP while performing work at the site. Appropriate Personal Protective Equipment will be specified in the HASP to prevent and manage the potential for exposure to impacted soil/fill material at the site.

Site Security and Posting – Currently, the site is surrounded by a locked security fence to prevent public access. Prominent signs will be posted to notify the public of restricted site access due to a remedial cleanup.

4.4.2 Exposure Management Based on Remedial Actions

Once the school is open to the public, the planned remedial actions are designed to manage the potential for exposure as follows:

- Post construction inhalation and dermal exposure pathways are to be eliminated with removal of approximately 3 feet or more of the upper surface soils, placement of a geotextile fabric at the bottom of the excavation, backfilling the excavation to grade with clean fill material, placement of an additional 3 feet of fill beneath building foundations, and placement of concrete and/or paved areas over 90 percent of the site.
- A Soil Management Plan (SMP) will be developed and maintained at the site to address the requirements for management of potential exposures to potentially impacted soil during intrusive subsurface excavation or related work at the site, should this type of subsurface work be necessary in the future once the school is opened. The SMP will identify the areas and depths of interest where constituent

concentrations in soil may exceed the risk-based standards developed for the site and provide measures to minimize/manage the potential for exposure. This plan will be developed under separate cover prior to completion of the construction and opening of the new school.

- A conveyance notice on the property to identify the area of soil that exceed the applicable RECAP standards for the intended future property use will be submitted to the appropriate regulatory agencies in accordance with RECAP.

4.5 Sampling and Analysis

4.5.1 Confirmation Sampling

Following excavation of the upper 3 feet of soil/fill at the site, confirmation samples will be collected as discrete samples from the floor and sidewall of the excavation per 22,500 square feet (a grid with 150 foot by 150 foot spacing). A minimum of one confirmation soil sample will be collected from the area underlying the demolished basement.

Soil samples will be collected using a decontaminated hand-auger or stainless-steel spoon. The soil will be placed in the appropriate sample containers as provided by the subcontracted analytical laboratory. The sample containers will be labeled with the appropriate sample identification number, depth of sample, date and time of sample collection, parameters for analyses, and the sample collector's name. Samples will be preserved on ice and transported under strict chain-of-custody to an LDEQ accredited laboratory for analyses. Confirmation soil samples will be analyzed for the metals parameters that failed the MO-1 LRS (antimony, arsenic, cadmium, lead, zinc, and mercury), by EPA Method 6020/7471B.

The data from this confirmation sampling will provide a snapshot of concentrations present at the base of the 3 feet of excavated soils. The RSD's contractor will not excavate further than the 3 feet as agreed upon during the August 7, 2013 meeting between the LDEQ, RSD, and CB&I.

4.5.2 Waste Sampling

A minimum of one representative composite sample of any material generated during demolition activities that might require disposal will be collected based on the disposal facility requirements. This may include concrete foundations, asphalt pavement, or piles. Collection of these samples may include fragmented or chipped samples. Samples of excess or excavated soils that require disposal will also be collected and retained for laboratory analyses.

All Samples retained for laboratory analyses will be placed in the appropriate laboratory-supplied containers and labeled with the appropriate sample identification number, depth

of sample, date and time of sample collection, parameters for analyses, and the sample collector's name. Samples will be preserved on ice and transported under strict chain-of-custody to an LDEQ accredited laboratory for analyses. Samples will be analyzed for constituents and by methods required by the designated disposal facility. This typically consists of Toxicity Characteristic Leaching Procedure (TCLP) volatiles, TCLP semi-volatiles, TCLP metals, reactivity, corrosivity, and ignitability.

4.5.3 Borrow Source Sampling

Clean fill used in the protective cover layer will be laboratory tested prior to placement. A minimum of one representative sample per 10,000 cubic feet of fill shall be taken from each borrow source, collected from a presumed unimpacted area, with additional samples being submitted based on changes in material. The fill should be typical fill used for buildings such as sand fill AASHTO A-3 non-plastic PL=0, free of roots, clay lumps and other deleterious materials with no more than 10% by weight of material passing a U.S. Standard No. 200 mesh sieve. The Geotechnical testing will be under the direction of the RSD geotechnical engineers and may include the following:

- Atterberg Limits (ASTM D4318)
- Fractional organic carbon (foc) (ASTM D2974)
- Moisture content ASTM D2216)
- Particle Size Analysis (ASTM D422)
- Hydraulic conductivity – falling head (ASTM D5084).

Soil samples will be analyzed for chemical constituents using the following methods:

- EPA Method 6020/7471 – Metals, total and dissolved
- EPA Method 8270c – Semivolatile organic compounds
- EPA Method 8260B – Volatile organic compounds
- EPA Method 8081A – Pesticides
- EPA Method 8082 – Polychlorinated biphenyls.

4.6 Waste Disposal

During the course of demolition/construction activities, impacted soils, materials such as concrete, asphalt, piles, equipment decontamination wastes, and potential accumulations of rainwater runoff in excavations will be segregated into like materials, characterized,

and transported to an approved disposal facility. Waste profile samples will be collected to facilitate acceptance of the waste at the receiving facility. Waste profile forms will be completed and submitted to the designated disposal facility. The waste will be shipped and disposed under the approved profile. Upon disposal, a copy of the disposal documentation will be provided to the LDEQ in the final report of the completion of the remedial actions.

During the remediation efforts, three types of water are expected to be encountered during demolition/construction activities.

1. The first type of water is stormwater run-off. Efforts will be made to route accumulated stormwater to either double-walled frac tanks or directed toward the adjacent stormwater system, if allowed by the agency. Any water contained in frac tanks will be sampled and disposed of in accordance with LDEQ and City of New Orleans regulations.
2. Accumulated rainwater or stormwater run-off may be encountered in the basement area that is to be excavated. Run-off control measures will be implemented to prevent stormwater run-off from entering excavations. This water will be managed the same as described for the stormwater run-off. As a precautionary measure, any water encountered in basement area will be captured in double-walled frac tank(s) and analyzed for site metal contaminants. In the event no metals exceedances are encountered, this water will be treated as the stormwater run-off as described in #1 above.
3. Lastly, if groundwater is encountered by the contractor during excavation or construction, the groundwater will be pumped from the excavation to double-walled frac tank(s) which will be sampled and the water disposed of in accordance with LDEQ Regulations.

All alternative methods of water disposal will be examined to minimize treatment costs and disposal costs. In all cases, the Best Available Technology will be utilized for the management and treatment of site waters.

4.7 Health and Safety

CB&I and each of Louisiana Recovery School District's contractors will be responsible for developing and implementing their own project specific health and safety plan. Currently, specific contractors have not been selected for this project. The HASPs will specify procedures to be followed by CB&I personnel and the contractors during field activities. During all sampling activities, CB&I field personnel will adhere to the HASP to insure that all excavations, sample collection, and decontamination activities are performed in a safe manner. The purpose of this plan is to assign responsibilities,

establish personnel protection standards, specify safe operating procedures, and provide for contingencies that may arise while conducting these remedial activities. It is expected that each Louisiana Recovery School District contractor will develop and implement their own site specific HASP while performing work at the site.

Prior to commencement of field activities the designated site health and safety officer (Field Supervisor) will conduct a safety briefing. During this meeting, all personnel will be informed of the possible chemical and physical hazards and will be required to read and sign the HASP. The HASP will be readily available in the field at all times. Regular safety meetings will be conducted by each contractor prior to work each day to advise workers of ongoing and new health and safety concerns.

4.8 Reporting

Upon completion of the remedial actions, CB&I, on the behalf of Louisiana Recovery School District, will submit a Corrective Action Report documenting the completion of the remedial action. The report will include the following:

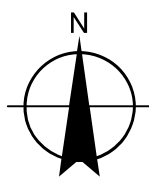
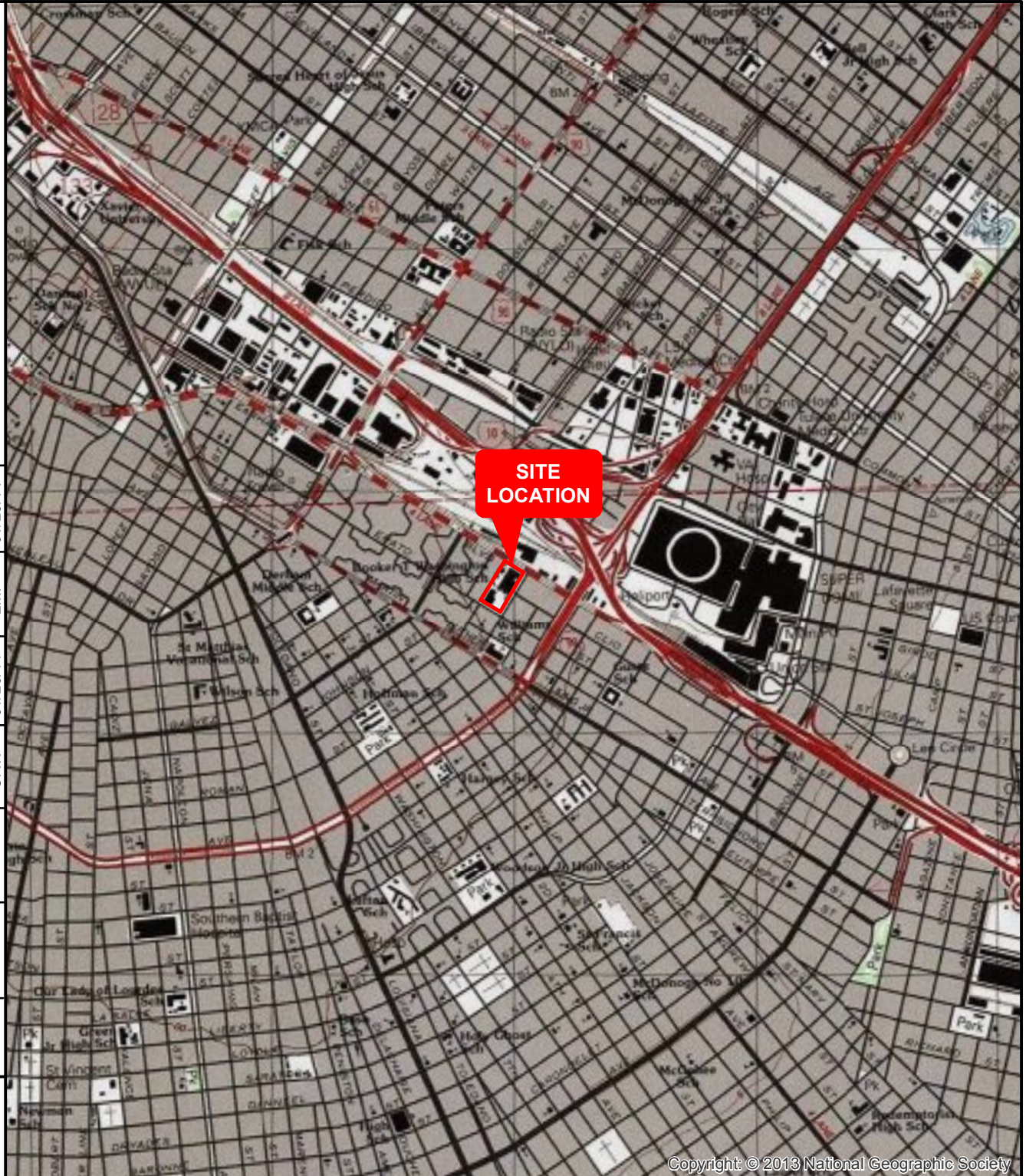
- Description of the remedial action activities;
- Demonstration that the remedial action goals were attained;
- Documentation that the physical control for protection against potential dermal and inhalation (dust) exposure were implemented; and
- Description of the volume and final disposal location of removed contaminated soils and other materials, including copies of the waste manifests.

5.0 Project Schedule

The Louisiana RSD anticipates remediation activities to start in the second quarter of 2014 with construction of the new school directly following.

FIGURES

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RECOVERY SCHOOL DISTRICT

CORRECTIVE ACTION WORKPLAN
BOOKER T. WASHINGTON HIGH SCHOOL, NEW ORLEANS, LA

FIGURE NUMBER

1

SITE LOCATION



CB&I Government Solutions, Inc.
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Baton Rouge, Louisiana 70809

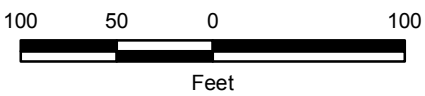
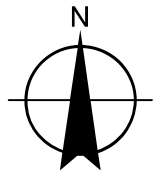
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Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Legend

- Property Boundary
- Existing Buildings Remaining on Property
- Existing Basement Remaining on Property



RECOVERY SCHOOL DISTRICT

CORRECTIVE ACTION WORKPLAN
BOOKER T. WASHINGTON HIGH SCHOOL, NEW ORLEANS, LA

FIGURE NUMBER

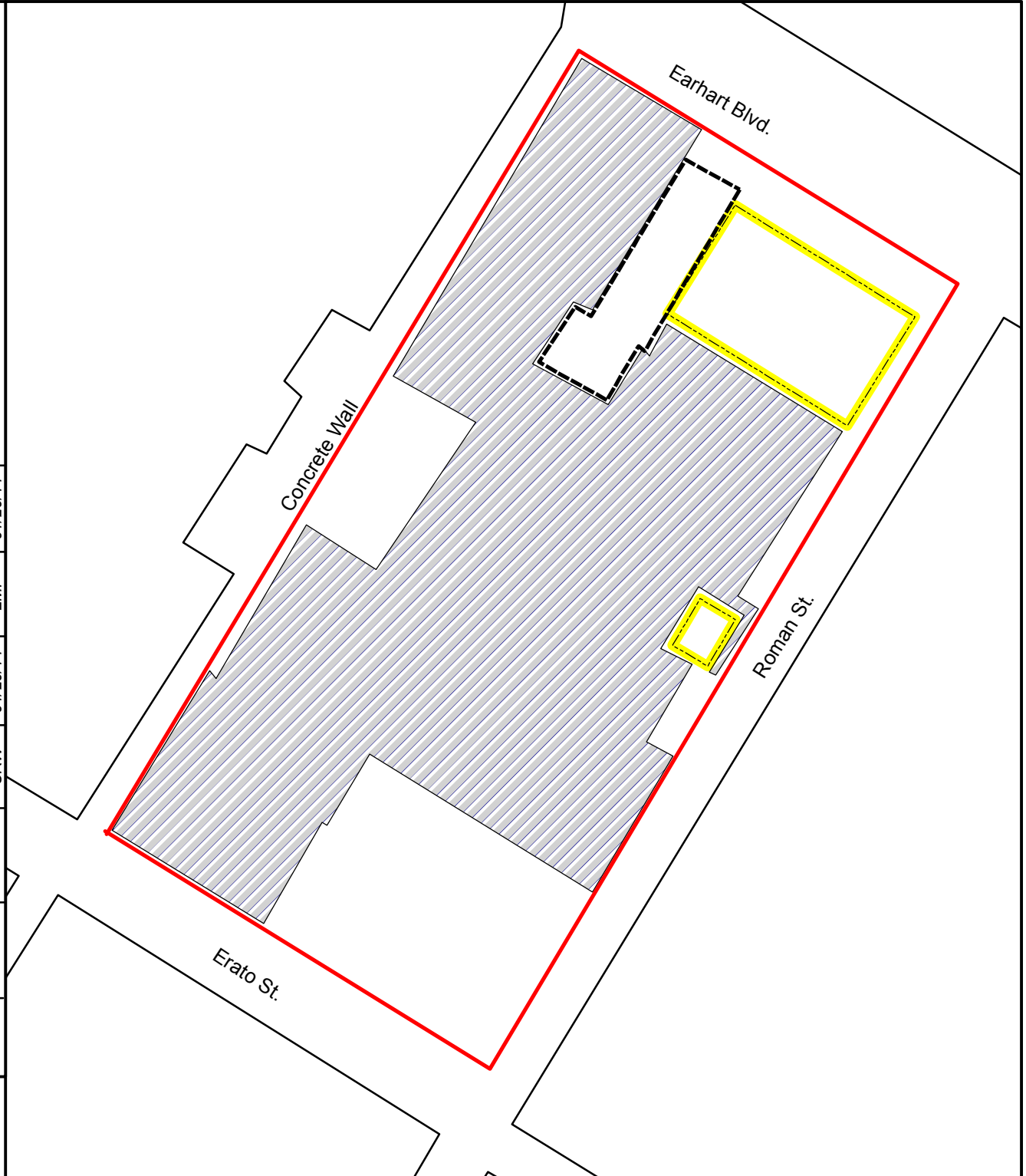
2

SITE LAYOUT



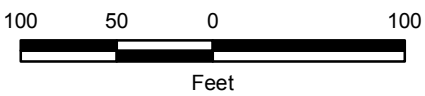
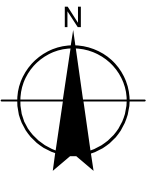
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 DRAWN BY: D. Comeaux 01/20/14
 CHECKED BY: CRW 01/20/14
 APPROVED BY: LMP 01/20/14
 DRAWING NUMBER: rsd_149184_0015_current_conditions



Legend

- Property Boundary/Soil Area of Investigation
- Basement Remaining on Property
- Slab and Paved Parking
- Buildings Remaining on Property



RECOVERY SCHOOL DISTRICT

CORRECTIVE ACTION WORKPLAN
 BOOKER T. WASHINGTON HIGH SCHOOL, NEW ORLEANS, LA

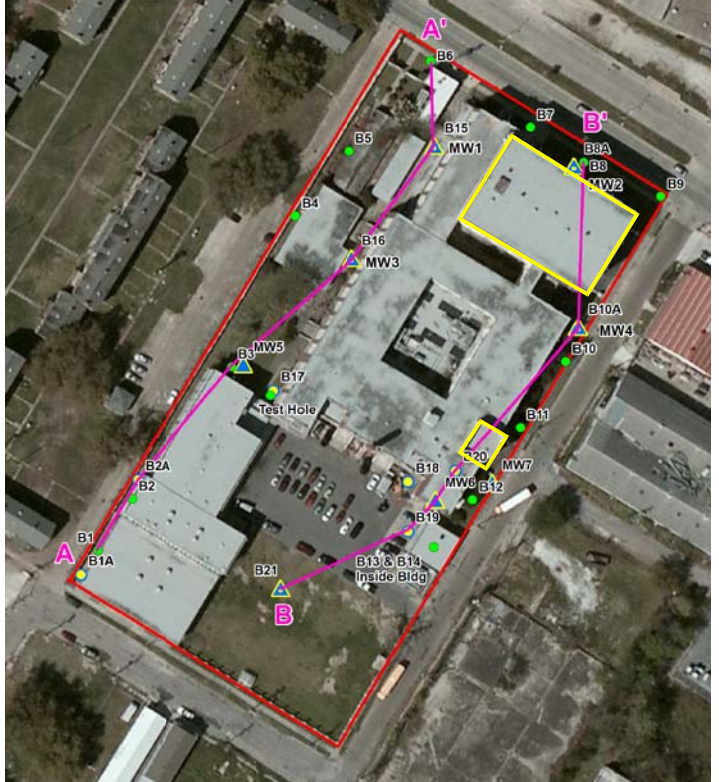
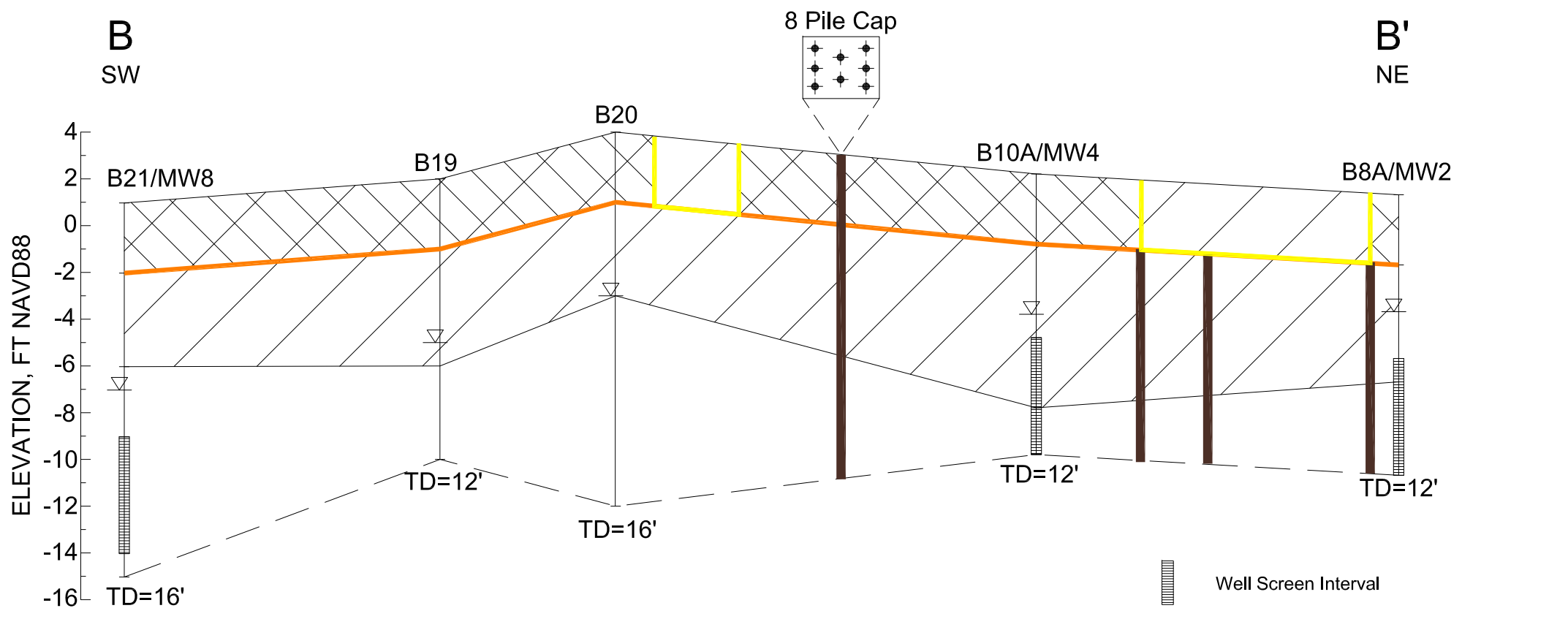
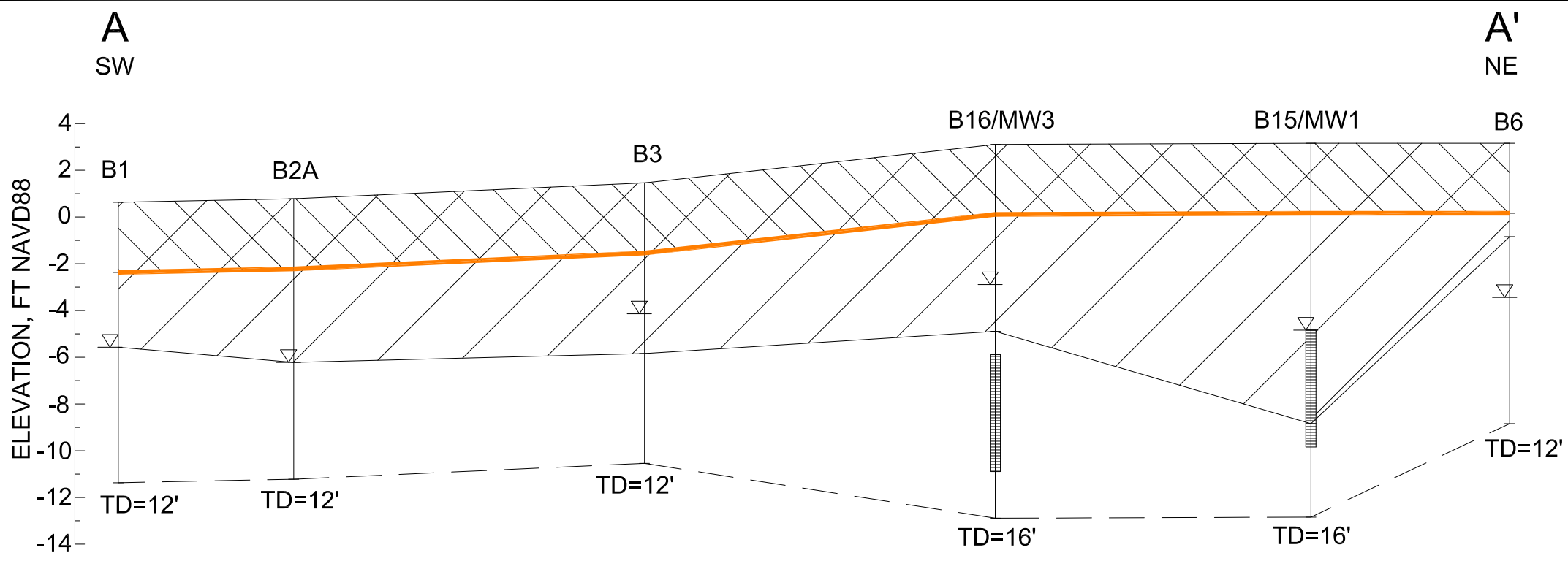
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3

CURRENT SITE CONDITIONS

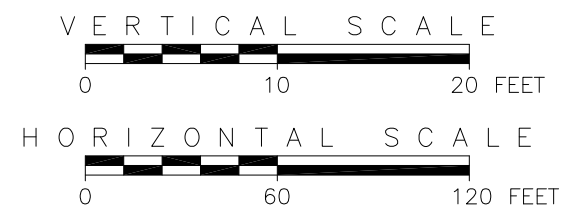


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- Legend**
- Previous Sample Location (June 2012)
 - ▲ Monitoring Well Location (April 2013)
 - ▲ Monitoring Well and Borehole Location (April 2013)
 - Borehole Location (April 2013)
 - Property Boundary
 - ▭ Buildings Remaining on Property

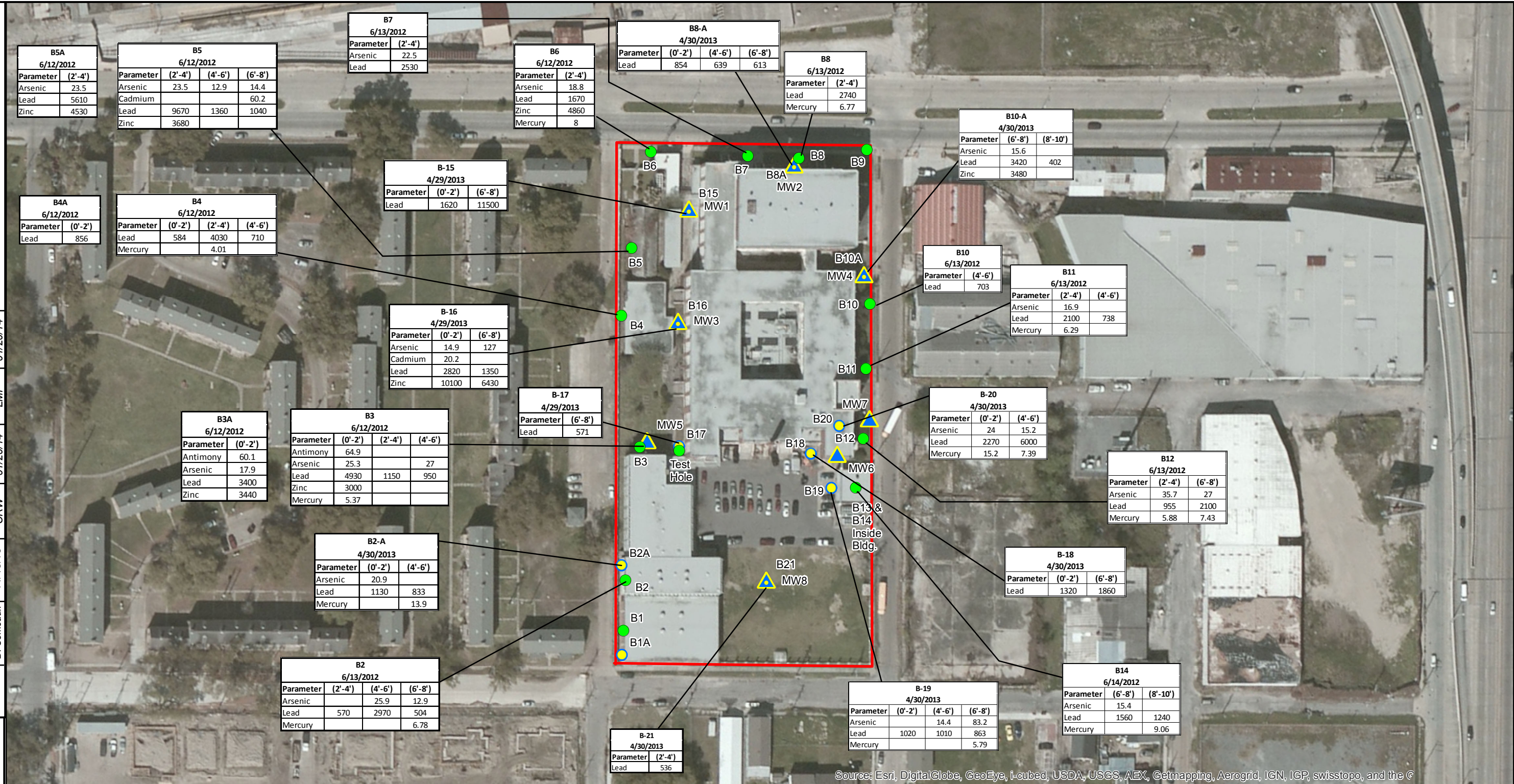


- LEGEND**
- ▨ Proposed Extent of Excavation
 - ▨ Fill - Predominately Silty Clay to Silty Sand with abundant fill debris (brick, glass, wood, coal, gravel, shells) and some intervals of abundant humus/organics (at B15/MW1, B19 and B20).
 - Native Soil - Predominately Clay with some Silty Clay

- ▨ Well Screen Interval
- ▽ Depth to first-encountered water at time of boring installation
- TD Total Depth of boring, in feet, below ground surface
- Proposed geotextile fabric layer
- ▭ Approximate Footprint of Remaining Buildings
- ▬ Existing Pile Cap

RECOVERY SCHOOL DISTRICT	
CORRECTIVE ACTION WORKPLAN BOOKER T. WASHINGTON HIGH SCHOOL, NEW ORLEANS, LA	
FIGURE NUMBER 4	SOIL CROSS-SECTIONS A-A' AND B-B'
CBI Government Solutions, Inc. 4171 Essen Lane Baton Rouge, Louisiana 70809 www.CBI.com	

OFFICE: BTR
 DRAWN BY: D. Comeaux 11/15/13
 CHECKED BY: CRW 01/20/14
 APPROVED BY: LMP 01/20/14
 DRAWING NUMBER: rsd_149184_0014_soil_concentrations MO1



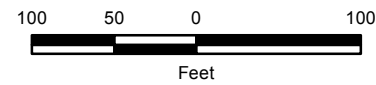
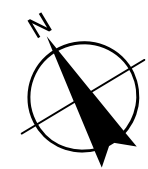
Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the ©

Legend

- Previous Sample Location (June 2012)
- ▲ Monitoring Well Location (April 2013)
- ▲ Monitoring Well and Borehole Location (April 2013)
- Borehole Location (April 2013)
- Property Boundary/Area of Investigation

NOTES:

- 1) Only constituent concentrations that exceed the RECAP Management Option-1 (MO-1) Standards are shown.
- 2) Concentration units are in milligrams per kilogram (mg/kg).



RECOVERY SCHOOL DISTRICT

CORRECTIVE ACTION WORKPLAN
BOOKER T. WASHINGTON HIGH SCHOOL, NEW ORLEANS, LA

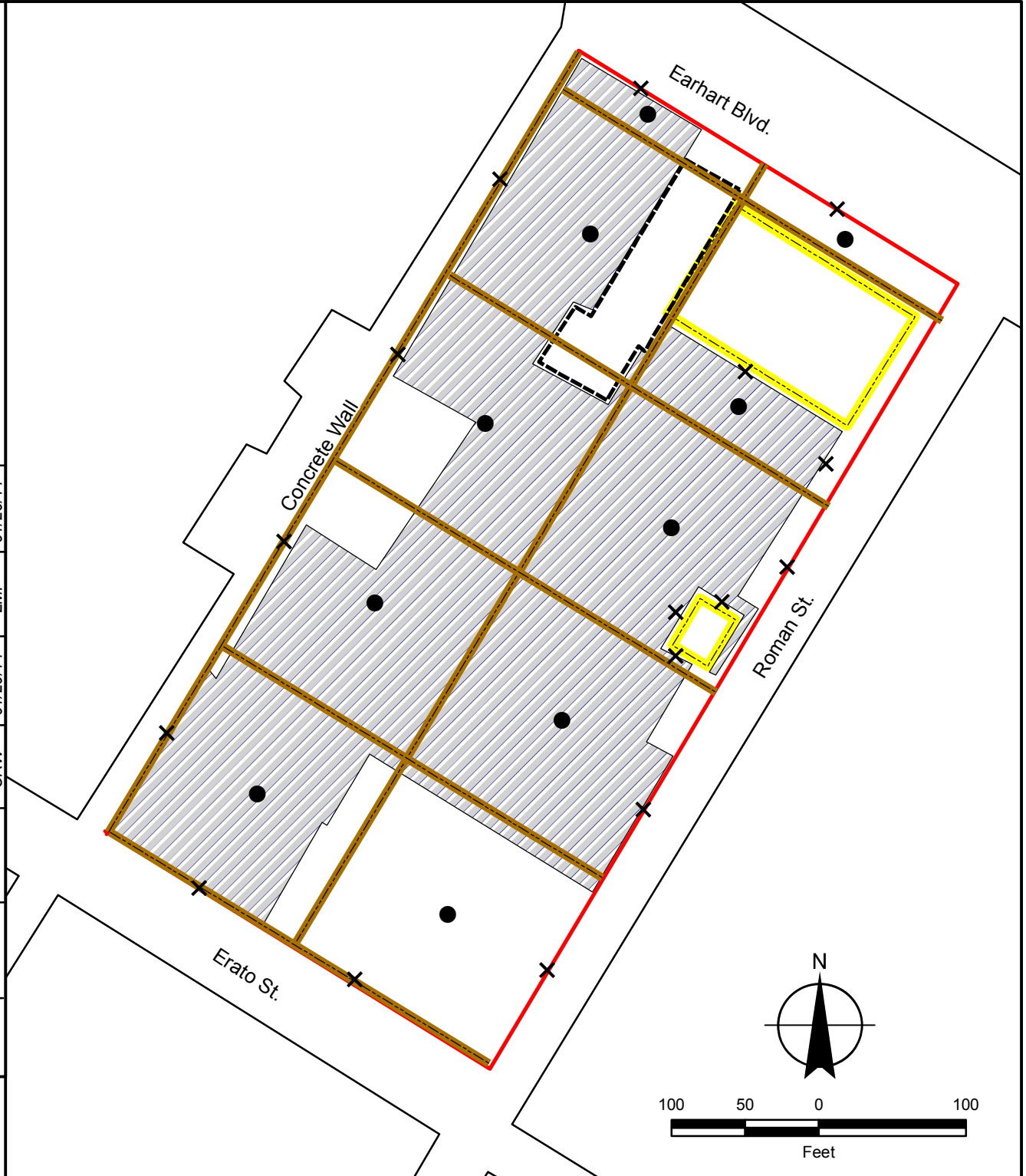
FIGURE NUMBER
5

**SURFACE SOIL COC
CONCENTRATIONS EXCEEDING
RECAP MO-1 STANDARDS**




CB&I Government Solutions, Inc.
4171 Essen Lane
Baton Rouge, Louisiana 70809

OFFICE: BTR
 DRAWN BY: D. Comeaux 01/20/14
 CHECKED BY: CRW 01/20/14
 APPROVED BY: LMP 01/20/14
 DRAWING NUMBER: rsd_149184_0016_confirmation_sampling



- Legend**
- Bottom Confirmation Sample
 - × Sidewall Confirmation Sample
 - Confirmation Sampling Grid 150' x 150'
 - Property Boundary/Soil Area of Investigation
 - - - Basement Remaining on Property
 - ▨ Slab and Paved Parking
 - ▭ Buildings Remaining on Property

RECOVERY SCHOOL DISTRICT	
CORRECTIVE ACTION WORKPLAN BOOKER T. WASHINGTON HIGH SCHOOL, NEW ORLEANS, LA	
FIGURE NUMBER 6	CONFIRMATION SAMPLING LAYOUT
 CB&I Government Solutions, Inc. 4171 Essen Lane Baton Rouge, Louisiana 70809	

APPENDIX A
LDEQ APPROVAL LETTER

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

November 1, 2013

Ms. Lona Hankins, Director of Capital Improvements
Louisiana Recovery School District
909 Poydras; Suite 1200
New Orleans, LA 70112

RE: Corrective Action Work Plan Request
Booker T. Washington School; **AI Number (36659)**
1201 S. Roman
New Orleans, LA, Orleans Parish

Dear Ms. Hankins:

As indicated in our September 16, 2013 letter, the Louisiana Department of Environmental Quality-Underground Storage Tank and Remediation Division (LDEQ/USTRD) accepted the recommendations contained within the August 20, 2013, Site Investigation and Risk Evaluation Corrective Action Program Report for the referenced site. You are hereby requested to submit, for approval, a corrective action work plan detailing the proposed recommendations.

A corrective action plan capable of providing remediation of all phases of contamination in soil and groundwater is requested to be submitted to the LDEQ within 60 days of receiving this letter. Please note that the plan should include conceptual plans for implementation utilizing site diagrams in plan view and cross section, with projections for the time required to complete remediation and the basis for the projections. The diagrams should designate the areas to be treated and the locations and type of treatment equipment to be used.

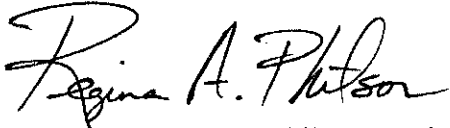
Please contact this office at (225) 219-3691 with any questions. All correspondence must include the AI number and be submitted in triplicate to:

Mr. Thomas F. Harris, Administrator
Underground Storage Tank and Remediation Division
P.O. Box 4312
Baton Rouge, LA 70821-4312

Ms. Lona Hankins
Page 2

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "Regina A. Philson". The signature is written in black ink and is positioned above the typed name.

Regina Atterberry Philson, Environmental Scientist III
Underground Storage Tank and Remediation Division

/rap

c: Imaging Operations – SW
Lisa Pultz, CB&I