APPENDIX A

SEPTEMBER 2008 PORT UPLANDS AREA SUPPLEMENTAL SOIL INVESTIGATION

INTRODUCTION

This appendix presents the results of a supplemental soil investigation completed by the Port of Anacortes (the "Port") in September 2008 at the Port Uplands Area of the Former Scott Paper Mill Site (the "Site") in Anacortes, Washington. The soil investigation supplements previous soil sampling performed at the Port Uplands Area as part of the site-wide remedial investigation (RI). The scope and results of the RI are documented in the RI report (GeoEngineers et al. 2008). The supplemental soil investigation was conducted in accordance with the Supplemental Soil Investigation Sampling and Analysis Plan (SAP) approved by the Washington State Department of Ecology (Ecology) on September 2, 2008 (GeoEngineers 2008).

OBJECTIVES

The supplemental soil investigation had two main objectives:

- 1. Provide data to refine estimates of the extent of soil contamination and the areas potentially requiring cleanup at the Port Uplands Area. Because of existing data gaps, there was some uncertainty regarding the extent of soil contamination that was identified during the RI.
- 2. Provide data to evaluate the potential waste designation of lead-impacted soil that may be removed during future cleanup actions. Toxicity characteristic leaching procedure (TCLP) testing was performed on selected soil samples to support the evaluation of soil disposal options and costs during remedial design.

FIELD PROGRAM

Twenty-five soil borings (GEI-1 through GEI-25) were completed at the Port Uplands Area on September 8, 9, and 10, 2008. Twenty-two of these borings were proposed in the SAP. Three borings (GEI-23, GEI-24, and GEI-25) were added to the scope based on conditions encountered in the field (two were step-out borings, and the third was intended to augment a nearby boring that had poor sample recovery). Figure A-1 shows the approximate locations of the soil borings. The boring locations were measured in the field using a portable Trimble[®] global positioning system instrument.

The soil borings were completed by Cascade Drilling of Woodinville, Washington, using a direct-push drilling rig. A small, mobile attachment to the drilling rig was used to advance boring GEI-22 due to limited access at this location. The borings were advanced to depths between 6 and 14 feet below ground surface (bgs). An attempt was made to collect continuous soil cores at each location for lithologic description and initial field screening; however, subsurface conditions precluded continuous core sampling at some locations. Soil observations and field screening data recorded on boring logs included soil lithology (color, grain size, moisture content, etc.), results of sheen testing, and results of headspace organic vapor screening using a photoionization detector (PID). Field screening procedures are described in the SAP. The boring logs are contained in Attachment 1.

SOIL SAMPLING

Soil sampling was conducted according to the procedures described in the SAP. Soil obtained from each target depth interval was placed in a decontaminated stainless steel bowl and mixed with a stainless steel spoon. Particles of wood, gravel, and other material larger than approximately 2 millimeters in size were removed from the mixed soil sample. A subsample of the mixed soil was placed in a laboratory-supplied glass sample jar, and the filled sample jar was stored in a cooler with ice. Remaining soil in the stainless steel bowl was then field-screened for organic vapors using a PID.

The stainless steel bowl and spoon were decontaminated prior to obtaining each sample by washing with an aqueous solution of Alconox[®] detergent and rinsing with distilled water. Soil cuttings and decontamination water were placed in two 55-gallon drums. The drums were marked and staged near the southeastern corner of Parcel 1.

WATER SAMPLING

Two water samples were collected for chemical analysis during the supplemental soil investigation. One groundwater grab sample was collected from boring GEI-24 to assess petroleum hydrocarbon concentrations in groundwater near the southeastern corner of the Seafarers' Park Building. This sample was obtained using a peristaltic pump, and was collected in laboratory-supplied sample containers. In addition, one equipment rinsate blank (field quality control sample) was collected to assess the effectiveness of the equipment decontamination procedure. The rinsate blank was obtained by swirling a small amount of distilled water in the decontaminated stainless steel mixing bowl, and then slowly pouring the water into laboratory-supplied sample containers.

ANALYTICAL TESTING

The soil and water samples were submitted for chemical analysis to Analytical Resources, Inc. (ARI) in Tukwila, Washington, using standard chain-of-custody protocols. The soil samples were analyzed for one or more of the following parameters in accordance with the soil sampling and analysis matrix (Table 1) contained in the SAP:

- Diesel- and motor oil-range total petroleum hydrocarbons (TPH) by Ecology Method NWTPH-Dx.
- Total metals (arsenic, copper, lead and/or zinc) by U.S. Environmental Protection Agency (EPA) Method 6020. ARI subcontracted the metal analyses to Fremont Analytical, Inc. (Fremont) in Seattle, Washington.
- Carcinogenic polycyclic aromatic hydrocarbons (cPAHs) by EPA Method 8270C-SIM. ARI subcontracted some of the cPAH analyses to Fremont.
- Dioxins and furans by EPA Method 8290. ARI subcontracted the dioxin and furan analyses to Pace Analytical Services, Inc. in Minneapolis, Minnesota.
- Lead by TCLP, EPA Method 1311. ARI subcontracted the TCLP lead analyses to Fremont.

The groundwater grab sample (GEI24-W) was analyzed for diesel- and motor oil-range TPH. The rinsate blank sample (RINSATE) was analyzed for TPH, total metals, and cPAHs.

The analytical results for the soil samples collected at Parcels 1, 2, and 3 are summarized in Tables A-1, A-2, and A-3, respectively. The analytical results for the groundwater and rinsate blank samples are summarized in Table A-4. A data quality assessment summary is included in Attachment 2.

RESULTS

This section summarizes the physical characteristics of the soil encountered in the supplemental soil borings and the analytical testing results for soil and water samples.

SOIL PHYSICAL CHARACTERIZATION

Soil samples obtained from each boring were visually inspected and field-screened (sheen and headspace organic vapor screening) to identify potential soil contamination as described in the SAP. Soil descriptions and field screening results are summarized below.

Parcel 1

Three borings (GEI-15, GEI-18, and GEI-20) were advanced to depths of 6 to 10 feet bgs on Parcel 1. Soils generally consisted of approximately 5 to 10 feet of silty sand with gravel, interpreted as fill material. An approximately 1- to 3-foot-thick, dark grey to dark brown silt horizon was encountered between approximately 5 and 8 feet bgs at borings GEI-18 and GEI-20. At GEI-20, wood debris was encountered between approximately 8 and 9 feet bgs. Silty sand and gravelly sand were encountered below the silt horizon and wood debris.

No field screening evidence of potential soil contamination was observed in borings GEI-15, GEI-18, or GEI-20.

Parcel 2

Fifteen borings (GEI-1, GEI-2, GEI-6 through GEI-14, GEI-16, GEI-19, GEI-22, and GEI-23) were advanced to depths of 10 to 14 feet bgs on Parcel 2. Soils generally consisted of approximately 5 to 10 feet of silty sand with gravel (interpreted as fill material), underlain by up to 5 feet of dark brown silt with varying amounts of wood debris. Wood debris consisting of sawdust, wood chips, and shredded wood was encountered at approximately 10 feet bgs and deeper. A white, decomposed, sawdust-like material was noted between 9.5 and 10 feet bgs in borings GEI-8 and GEI-9, and between 2.5 and 6.5 feet bgs in boring GEI-19. At two locations where borings extended through the wood debris layer (borings GEI-7 and GEI-13), silt interpreted as native marine sediment deposits was encountered at a depth of approximately 13 to 14 feet bgs.

Evidence of potential petroleum contamination (petroleum-like odors and moderate to heavy sheens) was observed in borings GEI-5, GEI-6, GEI-14, GEI-21, GEI-23, and GEI-24. In general, the petroleum-like odors and sheens observed in these borings were present at depths ranging from 10 to 13 feet bgs in a sand and silt horizon overlying wood debris. Although three of these borings (GEI-5, GEI-21, and GEI-24) are located on Parcel 3, they are included in this Parcel 2 discussion because the area of petroleum contamination identified during the RI appears to be continuous in the northeastern portion of the Site, which includes parts of Parcels 2 and 3.

The white, decomposed, sawdust-like material encountered at depths between 2.5 and 10 feet bgs in borings GEI-8, GEI-9, and GEI-19 had a rancid odor. Field screening of this material did not yield evidence of potential contamination; no organic vapors or sheens were noted. However, a moderate to heavy sheen and petroleum-like odor were noted at approximately 4.5 to 5.5 feet bgs in GEI-9. This sheen and petroleum-like odor appeared to be associated with a thin (3-inch) horizon of black-stained wood debris.

Parcel 3

Seven borings (GEI-3 through GEI-5, GEI-17, GEI-21, GEI-24, and GEI-25) were advanced to depths of 6 to 14 feet bgs on Parcel 3. Soils on the eastern portion of Parcel 3 generally consisted of sand, silt, and peat to a depth of approximately 7 to 10 feet bgs. Wood debris consisting of sawdust, wood chips, and shredded wood was encountered at approximately 10 feet bgs and deeper. Hydrogen sulfide-like odors were noted within the wood debris. Concrete and brick debris were encountered in boring GEI-3 from just below ground surface to 12.5 feet bgs, and in boring GEI-25 where drilling refusal was met at 5 feet bgs.

Evidence of potential petroleum contamination was noted in borings GEI-5, GEI-21, and GEI-24 as described in the Parcel 2 discussion, above. No field screening evidence of potential soil contamination was observed in borings GEI-3, GEI-4, GEI-17, or GEI-25.

SOIL ANALYTICAL RESULTS

The soil analytical data for the Port Uplands Area were evaluated in the RI report (GeoEngineers et al. 2008) by comparing the detected chemical concentrations directly to the protective soil concentrations that were considered in the development of the preliminary soil cleanup levels presented in Table 1 of the RI report. These protective soil concentrations include concentrations protective of direct human contact and terrestrial ecological receptors. The soil analytical data from the September 2008 supplemental soil investigation were evaluated in the same manner, as discussed below.

Locations at the Port Uplands Area where one or more constituents were detected in soil during the RI at a concentration exceeding the preliminary cleanup levels protective of direct human contact and terrestrial ecological receptors are shown in Figures 13 through 16 of the RI report. These figures have been updated with the September 2008 supplemental soil data, and are included in the Cleanup Action Plan (CAP) as Figures 3 through 6. The locations of preliminary soil cleanup level exceedances are displayed for four different depth intervals in the CAP figures: 0 to 2 feet bgs (Figure 3), 2 to 6 feet bgs (Figure 4), 6 to 10 feet bgs (Figure 5), and 10 to 15 feet bgs (Figure 6).

Parcel 1

The soil analytical results for Parcel 1 are summarized in Table A-1. Copper, lead, and zinc were detected at concentrations above the preliminary cleanup levels in soil between 2 and 6 feet bgs at boring GEI-15 (CAP Figure 4).

TCLP lead was analyzed in the soil sample obtained from 2 to 6 feet bgs at GEI-15; lead was not detected in the TCLP leachate.

Parcel 2

The soil analytical results for Parcel 2 are summarized in Table A-2. Diesel- and motor oil-range TPH were detected at concentrations above the preliminary cleanup levels in soil between 10 and 14 feet bgs at borings GEI-6 and GEI-23 (CAP Figure 6). At boring GEI-6, total cPAHs (toxicity equivalent quotient [TEQ]) also were detected above the preliminary cleanup level in soil between 10 and 14 feet bgs. The TPH detected at borings GEI-6 and GEI-23 appears to be connected with the area of petroleum contamination immediately west of the Seafarers' Park Building.

Total furans (TEQ) were detected at concentrations above the preliminary cleanup level in soil between 6 and 10 feet bgs at borings GEI-10 and GEI-13 (CAP Figure 5). Total dioxins (TEQ) were detected at a

concentration above the preliminary cleanup level in soil between 10 and 14 feet bgs at boring GEI-1 (CAP Figure 6). Copper was detected at a concentration above the preliminary cleanup level in soil between 10 and 14 feet bgs at borings GEI-1 and GEI-13 (CAP Figure 6).

Parcel 3

The soil analytical results for Parcel 3 are summarized in Table A-3. Diesel-range TPH, copper, and zinc were detected at concentrations above the preliminary cleanup levels in soil between 6 and 14 feet bgs at boring GEI-24 (CAP Figures 5 and 6). Motor oil-range TPH also was detected at a concentration above the preliminary cleanup level at boring GEI-24, in soil between 6 and 10 feet bgs (CAP Figure 5). The TPH detected at boring GEI-24 appears to be connected with the area of petroleum contamination immediately west of the Seafarers' Park Building. Total furans (TEQ) were detected at concentrations above the preliminary cleanup level in soil between 6 and 10 feet bgs at boring GEI-5 (CAP Figure 5).

TCLP lead was analyzed in the primary and duplicate soil samples obtained from 10 to 14 feet bgs at GEI-24; lead was not detected in the TCLP leachate for either sample.

WATER ANALYTICAL RESULTS

The analytical results for the groundwater and rinsate blank samples are summarized in Table A-4. Dieseland motor oil-range TPH were detected at concentrations above the preliminary cleanup levels in the groundwater grab sample obtained from boring GEI-24.

Copper was detected at a concentration equal to the method reporting limit of 0.004 milligrams per liter in the rinsate blank sample. This detection is suspect, as copper had elevated spike recoveries in the laboratory control sample (107%), matrix spike sample (125%), and matrix spike duplicate sample (113%). No other analytes were detected in the rinsate blank sample.

SUMMARY

The September 2008 supplemental investigation was conducted to address data gaps regarding the extent of soil contamination at the Port Uplands Area. The supplemental investigation data are combined with previous RI data in CAP Figures 3 through 6. A summary of constituents detected at concentrations above the RI preliminary cleanup levels in the September 2008 and previous soil samples collected at the Port Uplands Area is presented below.

- 0 to 2 feet bgs (CAP Figure 3). Arsenic was the only constituent detected at concentrations above the preliminary cleanup levels. Arsenic exceeded the preliminary cleanup level at one location in Seafarers' Memorial Park on Parcel 3.
- 2 to 6 feet bgs (CAP Figure 4). Metals (arsenic, lead, zinc, copper, and mercury), dioxins/furans, and cPAHs were detected at concentrations above the preliminary cleanup levels. Copper and dioxins/furans exceeded preliminary cleanup levels in the southern portion of Seafarers' Memorial Park on Parcel 3. Metals (arsenic, lead, zinc, and copper) and cPAHs exceeded preliminary cleanup levels at three locations at the southern end of "R" Avenue. On Parcel 2, cPAHs exceeded the preliminary cleanup level at two locations, copper and zinc exceeded preliminary cleanup levels at one location, and mercury exceeded the preliminary cleanup level at one location.
- 6 to 10 feet bgs (CAP Figure 5). Diesel- and motor oil-range TPH, metals (arsenic, antimony, copper, lead, chromium, nickel, mercury, and zinc), dioxins/furans, polychlorinated biphenyls (PCBs), and cPAHs were detected at concentrations above the preliminary cleanup levels at multiple

locations on Parcels 2 and 3. Arsenic was detected at a concentration above the preliminary cleanup level at one location on Parcel 1.

• 10 to 15 feet bgs (CAP Figure 6). Diesel- and motor oil-range TPH, metals (copper, lead, and zinc), dioxins/furans, and cPAHs were detected at concentrations above the preliminary cleanup levels at multiple locations on Parcels 2 and 3. TPH impacts are primarily located in an area west and northwest of the Seafarers' Park Building. With one exception (lead at location LSB-5), all of the metal exceedances in the 10 to 15-foot depth interval were south of the Seafarers' Park Building.

One of the objectives of the supplemental soil investigation was to provide data to evaluate the potential waste designation of lead-impacted soil that may be removed during future cleanup actions. TCLP lead analyses were performed on two primary soil samples (GEI15-2-6 and GEI24-10-14) and one field duplicate sample (DUP-2; duplicate of GEI24-10-14). These samples that had total lead concentrations of the order of 100 milligrams per kilogram (mg/kg) or greater. Lead was not detected above method reporting limits (0.4 to 4.0 milligrams per liter) in the TCLP leachate for these samples. These results suggest that soil at the Port Uplands Area with total lead concentrations as high as 680 mg/kg (the concentration reported in sample GEI15-2-6) likely would not exhibit the toxicity characteristic for lead, and thus would not be designated as a dangerous waste under Washington State Dangerous Waste Regulations (Washington Administrative Code Chapter 173-303-090).

REFERENCES

- GeoEngineers et al. 2008. Final Remedial Investigation Report Port Uplands Area, MJB North Area, and Marine Area, Former Scott Paper Company Mill Site, Anacortes, Washington. November 7, 2008.
- GeoEngineers. 2008. Final Supplemental Soil Investigation Sampling and Analysis Plan, Former Scott Paper Mill Site, Anacortes, Washington. September 4, 2008.

Tables

- Table A-1. Soil Analytical Data Summary, Port Parcel 1 September 2008
- Table A-2. Soil Analytical Data Summary, Port Parcel 2 September 2008
- Table A-3. Soil Analytical Data Summary, Port Parcel 3 September 2008
- Table A-4. Water Analytical Data Summary September 2008

Figures

Figure A-1. September 2008 Supplemental Sampling Boring Locations

Attachments

Attachment 1Boring LogsAttachment 2Data Quality Assessment Summary

TABLE A-1 SOIL ANALYTICAL DATA SUMMARY, PORT PARCEL 1 - SEPTEMBER 2008 FORMER SCOTT PAPER COMPANY MILL SITE

		Sample Location	GEI-15		GEI-18	GEI-20	
		Sample Name	GEI15-2-6		GEI18-6-10	GEI20-6-10	
	Preliminary Soil	Depth (ft)	2-6		6-10	6-10	
	Cleanup Level*	Sample Date	09-Sep-08		09-Sep-08	09-Sep-08	
Metals (mg/kg)							
Arsenic	20		11		4.9	8.9	
Copper	100		160				
Lead	220		680				
Zinc	270		630				
TCLP Lead (mg/L)			< 4.0	U			
Carcinogenic Polycyclic Aromatic Hydroca	arbons (cPAHs) (u	g/kg)					
Benzo(a)anthracene			82				
Benzo(a)pyrene			93				
Benzo(b)fluoranthene			100				
Benzo(k)fluoranthene			76				
Chrysene			110				
Dibenzo(a,h)anthracene			18				
Indeno(1,2,3-cd)pyrene			35				
Total cPAHs TEQ	140		130				

Notes:

*Preliminary soil cleanup levels are discussed in the Remedial Investigation (RI) report. See Table 1 of RI report.

mg/kg = Milligrams per kilogram

ug/kg = Micrograms per kilogram

TCLP = Toxicity Characteristic Leaching Procedure

TEQ = Toxicity Equivalent Quotient

TEF = Toxicity Equivalency Factor

MTCA = Model Toxics Control Act

cPAH TEQ values for samples with at least one positive cPAH detection were calculated using MTCA TEF values in effect as of January 2008 (see Table 2, Draft Final RI).

Blue text = Value exceeds MTCA terrestrial ecological criteria only (criteria are in Table 1 of RI report).

Red text = Value exceeds MTCA terrestrial ecological and human health criteria, or human health criteria only if no terrestrial ecological criteria established or if

terrestrial ecological criteria are greater than the human health criteria (criteria are in Table 1 of RI report).

-- = Not analyzed/site-specific cleanup level not established

U = The constituent was analyzed, but was not detected above the specified method reporting limit.

TABLE A-2 SOIL ANALYTICAL DATA SUMMARY, PORT PARCEL 2 - SEPTEMBER 2008 FORMER SCOTT PAPER COMPANY MILL SITE

		Sample Location	GEI-1	GEI-1	GEI-2	GEI-2	GEI-6	GEI-6	GEI-7	GEI-7	GEI-8	GEI-9	GEI-9	GEI-10	GEI-10	GEI-11	GEI-11	GEI-12	GEI-12	
		Sample Name	GEI1-2-6	GEI1-10-14	GEI2-6-10	GEI2-10-14	GEI6-6-10	GEI6-10-12	GEI7-6-10	GEI7-10-14	GEI8-6-10	GEI9-2-6	GEI9-6-10	GEI10-2-4	GEI10-6-10	GEI11-2-6	GEI11-6-10	GEI12-2-6	GEI12-6-1	10
	Preliminary Soil	Depth (ft)	2-6	10-14	6-10	10-14	6-10	10-12	6-10	10-14	6-10	2-6	6-10	2-4	6-10	2-6	6-10	2-6	6-10	
	Cleanup Level*	Sample Date	10-Sep-08	10-Sep-08	08-Sep-08	08-Sep-08	08-Sep-08	08-Sep-08	09-Sep-08	09-Sep-08	09-Sep-08	09-Sep-08	09-Sep-08	09-Sep-08	09-Sep-08	09-Sep-08	09-Sep-08	09-Sep-08	09-Sep-0	/8
Total Petroleum Hydrocarbons (mg/kg)																				
Diesel-range	460				12	25	200	5,300	32	230			28		23		29		36	
Motor oil-range	2,000				21	96	1,200	34,000	85	460			57		70		88		140	
Metals (mg/kg)																				
Arsenic	20		6.6	6.4		2.2	2.0	2.3												
Copper	100		63	170		43	36	32												
Lead	220		22	65		11	19	37												
Zinc	270		100	120		29	24	93												
TCLP Lead (mg/L)																				
Carcinogenic Polycyclic Aromatic Hydroca	rbons (cPAHs) (ug	ı/kg)		- T - T	-	r - r	- 1	- 1	r	T T	r	-1	T T	T T	-1 - T	r – r				
Benzo(a)anthracene					27	36		< 190 U		38		61		< 4.8 U	J	10		< 4.6 l	J	
Benzo(a)pyrene					27	52		290		60		27		< 4.8 U	J	14		< 4.6 U	J	
Benzo(b)fluoranthene					20	38		< 190 U		40		30		< 4.8 U	J	16		< 4.6 l	J	
Benzo(k)fluoranthene					20	59		< 190 U		48		24		< 4.8 U	J	12		< 4.6 l	J	
Chrysene					32	50		230		50		75		< 4.8 U	J	12		6.0		
Dibenzo(a,h)anthracene					< 4.8	U 14		< 190 U		8.7		5.6		< 4.8 U	J	< 4.6 U)	< 4.6 l	J	
Indeno(1,2,3-cd)pyrene		_			15	28		< 190 U		19		13		< 4.8 U	J	7.4		< 4.6 l	<u> </u>	
I otal cPAHs TEQ	140				36	70		340		76		41		<3.6 U	J	19		3.5		
Dioxins/Furans (ng/kg)				T T	1	г.т. <u>г</u>			<u>г г</u>	r	<u>г т</u>		<u>г г</u>			<u>г г</u>	T			_
1,2,3,4,6,7,8-HpCDD			9.3	220	2.8	J	5				20				120				13	
1,2,3,4,7,8-HxCDD			0.26	J 3.6	J < 0.33	U	< 0.54	U			< 0.55 l	J			1.6 J				< 0.18	UJ
1,2,3,6,7,8-HxCDD			0.63	J 10	< 0.33	UJ	0.84	J			1.3				5.4				0.82	J
1,2,3,7,8,9-HxCDD			< 0.069	J 4.8	J < 0.27	0	< 0.65				1.6				2.8 J				< 0.21	UJ
1,2,3,7,8-PeCDD			< 0.15	J < 1.0 U	JJ < 0.26	UJ	< 0.42				< 0.60	J			1.5 J				< 0.28	
2,3,7,8-TCDD		_	< 0.14 U	J < 2.1	J < 0.082	U	0.32	J			< 0.28	J			< 0.47 U				< 0.27	0
			11	2,000	21		41				220				1,200				110	_
1,2,3,4,6,7,8-HPCDF			2.6	J < 1.6 U	JJ < 0.21	UJ	1.6	J			4.8				21				4.5	<u> </u>
			0.24	J 3.1	J < 0.31		< 0.7				< 0.48	J			1.7 J				0.95	
			< 0.12		JJ < 0.15		< 0.31	JJ			< 0.51				1.9 J				2.0	
		_	< 0.11	4.9	J < 0.16		< 0.33				< 0.00	, <u></u>			< 0.43 UJ				0.64	
1 2 3 7 8-PoCDE		_	< 0.15	2.3	0.10		0.66				< 0.29	,			1.1 J				< 0.04	
2 3 4 6 7 8-HyCDE		-	0.13 0		0.50		0.00	J			< 0.05				0.96 1				0.23	- 03
2,3,4,0,7,0-1100D1			0.44		JJ _ 0.30	J	< 0.45	U			< 0.34	J			2.30 0				1.2	
2,3,4,7,0-FEODF 2,3,7,8,TCDF			0.37		11 0.95		< 0.37				0.47	,			2.3 J			++	0.65	
2,0,7,0-1001			5.0		16		< 1.0				12				/8				13	
Total Dioxins/Eurans TEO (human bealth)			0.62	73	0.45		0.91				13				5.8			++	14	+
Total Dioxins TEO (mammals)	5		0.35	62	0.45		0.74				1.0				43			+	0.54	+
Total Eurans TEQ (mammals)	3		0.26	11	0.20		0.17		<u> </u>		0.25		+ <u>.</u> +	+ +	1.5	<u> </u>	+ +	++	0.89	+
Total Furans TEO (hirds)	3	-	0.91	21	1 1		0.17				0.82				4.6			+	2.4	+
	5		3.01	2.1	1.1		0.77			1	0.02					1	1		2.7	

TABLE A-2 SOIL ANALYTICAL DATA SUMMARY, PORT PARCEL 2 - SEPTEMBER 2008 FORMER SCOTT PAPER COMPANY MILL SITE

		Sample Location	GEI-13		GEI-13	GEI-13		GEI-14		GEI-14		GEI-14	GEI-16		GEI-19	GEI-22		GEI-23	T	GEI-23	
		Sample Name	GEI13-2-6		GEI13-6-10	GEI13-10-1	14	GEI14-2-4		GEI14-6-8		GEI14-10-14	GEI16-2-6	G	EI19-7-10	GEI22-6-9		GEI23-6-10		GEI23-10-1-	4
Γ	Preliminary Soil	Depth (ft)	2-6		6-10	10-14		2-4		6-8		10-14	2-6		7-10	6-9		6-10		10-14	
	Cleanup Level*	Sample Date	10-Sep-08		10-Sep-08	10-Sep-08	3	09-Sep-08		09-Sep-08		09-Sep-08	09-Sep-08	0	8-Sep-08	08-Sep-08		09-Sep-08		09-Sep-08	,
Total Petroleum Hydrocarbons (mg/kg)						•															
Diesel-range	460				41	48				< 6.0	U	98						8.9		1,300	
Motor oil-range	2,000				280	120				15		220						25		7,500	
Metals (mg/kg)																					
Arsenic	20		7.8			11						8.3	9.6		1.4			2.5		1.1	
Copper	100		30			113						56	46					35		39	
Lead	220		6.2			52						36	32			35	J	27		11	
Zinc	270		77			240						100	99					45		14	
TCLP Lead (mg/L)																					
Carcinogenic Polycyclic Aromatic Hydrocar	rbons (cPAHs) (ug	/kg)				-	_												- T		
Benzo(a)anthracene		_	< 4.8	U				< 4.6	U			53	56			 		< 5.0	R	8.0	J
Benzo(a)pyrene			< 4.8	U				< 4.6	U			73	80			 		14	J	12	J
Benzo(b)fluoranthene			< 4.8	U				4.6				62	97			 		30	J	28	J
Benzo(k)fluoranthene			< 4.8	U				< 4.6	U			52	80			 		14	J	12	J
Chrysene			6.3					6.5				100	72			 		22	J	17	J
Dibenzo(a,h)anthracene		_	< 4.8	U				< 4.6	U			17	16					16	J	10	
Indeno(1,2,3-cd)pyrene		_	< 4.8	U				< 4.6	U			33	27			 	_	26	J	14	UJ
Total cPAHs TEQ	140		3.7					3.7				96	110					23		19	
Dioxins/Furans (ng/kg)				- 1	40	1					- T			-			-		<u> </u>		_
1,2,3,4,6,7,8-HPCDD		_			42											 	_				+
1,2,3,4,7,8-HXCDD		_			< 0.28 0.											 	_				+
1,2,3,0,7,8-HXCDD		_			1.9 J		_									 	-				+
1,2,3,7,8,9-HXCDD		-		_	1.7 J						-					 	-				+
2 3 7 8 TCDD		-		-	- 0.34 U				_		-					 	-				+
2,3,7,8-1000 OCDD		_		-	530						-					 	-				+
1 2 3 4 6 7 8-HpCDE		_		-	5.8						-					 	-				+
1 2 3 4 7 8 9-HpCDE		_			< 0.66 U		_		-												+
1.2.3.4.7.8-HxCDF		_			1.3 J																+
1,2,3,6,7,8-HxCDF		_		_	1.2 J						_										+
1.2.3.7.8.9-HxCDF					1.0 J																
1.2.3.7.8-PeCDF					< 0.40 U	J I															
2,3,4,6,7,8-HxCDF					1.2 J																
2.3.4.7.8-PeCDF					2.5 J																
2,3,7,8-TCDF					1.4																
OCDF					9.7																
Total Dioxins/Furans TEQ (human health)	11				3.2																+
Total Dioxins TEQ (mammals)	5				1.8																
Total Furans TEQ (mammals)	3				1.4																
Total Furans TEQ (birds)	3				4.5																
Total Furans TEQ (mammals) Total Furans TEQ (birds)	3	-			1.4 4.5																Ē

Notes:

*Preliminary soil cleanup levels are discussed in the Remedial Investigation (RI) report. See Table 1 of RI report.

mg/kg = Milligrams per kilogram

ug/kg = Micrograms per kilogram

ng/kg = Nanograms per kilogram

TCLP = Toxicity Characteristic Leaching Procedure

TEQ = Toxicity Equivalent Quotient

TEF = Toxicity Equivalency Factor

MTCA = Model Toxics Control Act

cPAH and dioxin/furan TEQ values for samples with at least one positive cPAH or dioxin/furan detection were calculated using MTCA TEF values in effect as of January 2008 (see Table 2, Draft Final RI). Blue text = Value exceeds MTCA terrestrial ecological criteria only (criteria are in Table 1 of RI report).

Red text = Value exceeds MTCA terrestrial ecological and human health criteria, or human health criteria only if no terrestrial ecological criteria established or if

terrestrial ecological criteria are greater than the human health criteria (criteria are in Table 1 of RI report).

-- = Not analyzed/site-specific cleanup level not established

U = The constituent was analyzed, but was not detected above the specified method reporting limit.

J = Estimated value reported below method reporting limit, or estimated based on data quality assessment.

R = Data value rejected based on data quality assessment.

TABLE A-3 SOIL ANALYTICAL DATA SUMMARY, PORT PARCEL 3 - SEPTEMBER 2008 FORMER SCOTT PAPER COMPANY MILL SITE

		Sample Location	GEI-3	GEI-3	GEI-3	GEI-4	GEI-5	GEI-5	GEI-17	GEI-21	GEI-21	GEI-24	GEI-24	GEI-24
		Sample Name	GEI3-0-2	GEI3-6-10	GEI3-10-14	GEI4-6-10	GEI5-6-10	GEI5-11-12	2 GEI17-2-6	GEI21-6-10	GEI21-10-14	GEI24-6-10	GEI24-10-14	DUP-2 (GEI24-10-14)
	Preliminary Soil	Depth (ft)	0-2	6-10	10-14	6-10	6-10	11-12	2-6	6-10	10-14	6-10	10-14	10-14
	Cleanup Level*	Sample Date	08-Sep-08	08-Sep-08	08-Sep-08	08-Sep-08	08-Sep-08	08-Sep-08	09-Sep-08	08-Sep-08	08-Sep-08	10-Sep-08	10-Sep-08	10-Sep-08
Total Petroleum Hydrocarbons (mg/kg)	•													· · ·
Diesel-range	460			< 5.8 U	6.0	8.6		33		24	150	1,800	670	480
Motor oil-range	2,000			< 12.0 U	35	26		67		100	610	3,900	1,400	1,200
Metals (mg/kg)		· · ·									· ·			
Arsenic	20		6.0	4.1	3.6	5.7	1.6		11	4.0	3.6	9.2	11	9.6
Copper	100			21	22	40	20		73	48	38	130	160	140
Lead	220	Ι Γ		8.7	3.2	28	14		37	35	9.0	47	93	160
Zinc	270	Ι Γ		55	49	80	36		170	63	30	280	340	290
TCLP Lead (mg/L)		Ι Γ											< 0.4	U < 0.4 U
Carcinogenic Polycyclic Aromatic Hydroca	rbons (cPAHs) (u	g/kg)												
Benzo(a)anthracene				5.3	< 4.7	U			34	32	44	35	21	22
Benzo(a)pyrene		Ι Γ		4.8	< 4.7	U			38	33	72	31	34	38
Benzo(b)fluoranthene				7.2	< 4.7	U			37	32	70	42	36	35
Benzo(k)fluoranthene		Ι Γ		< 4.8 U	< 4.7	U			30	26	70	26	32	41
Chrysene				6.7	< 4.7	U			44	53	74	67	37	42
Dibenzo(a,h)anthracene		Ι Γ		< 4.8 U	< 4.7	U			5.9	5.3	6.5	5.5	9.9	13
Indeno(1,2,3-cd)pyrene		Ι Γ		< 4.8 U	< 4.7	U			13	15	24	11	17	22
Total cPAHs TEQ	140			6.8	<3.5	U			50	45	94	44	46	52
Dioxins/Furans (ng/kg)														
1,2,3,4,6,7,8-HpCDD				4.4 J	3.5	J 3.7	J 25							
1,2,3,4,7,8-HxCDD				0.59 J	0.18	J < 0.20	U 3.1	J						
1,2,3,6,7,8-HxCDD				0.85 J	0.36	J < 0.31	UJ 5.4							
1,2,3,7,8,9-HxCDD				0.68 J	< 0.16	UJ 0.40	J 4.4	J						
1,2,3,7,8-PeCDD				1.1 J	0.13	J < 0.19	UJ < 0.47	UJ						
2,3,7,8-TCDD				0.51 J	< 0.032	U < 0.17	U < 0.32	UJ						
OCDD				23	36	23	66							
1,2,3,4,6,7,8-HpCDF				2.4 J	< 0.044	UJ < 0.21	UJ 7.6							
1,2,3,4,7,8,9-HpCDF				< 0.23 U	0.12	J < 0.23	U 0.87	J						
1,2,3,4,7,8-HxCDF				< 0.25 J	0.20	J < 0.14	U < 0.23	UJ						
1,2,3,6,7,8-HxCDF				0.79 J	0.24	J < 0.13	UJ 1.7	J						
1,2,3,7,8,9-HxCDF				< 0.30 U	< 0.085	U < 0.10	U 0.58	J						
1,2,3,7,8-PeCDF				3.1 J	< 0.095	UJ < 0.22	U 1.8	J						
2,3,4,6,7,8-HxCDF				0.46 J	< 0.069	UJ < 0.10	UJ 2.8	J						
2,3,4,7,8-PeCDF				< 0.25 J	< 0.078	UJ 0.26	J 5.3							
2,3,7,8-TCDF				< 0.13 J	< 0.14	U 0.32	J 4.5							
OCDF		ļ		2.1 J	1.2	J 1.5	J 12							
Total Dioxins/Furans TEQ (human health)	11			2.2	0.33	0.43	4.7							
Total Dioxins TEQ (mammals)	5			1.9	0.25	0.29	2.0							
Total Furans TEQ (mammals)	3			0.32	0.074	0.14	2.7							
Total Furans TEQ (birds)	3			0.68	0.17	0.62	11							

Notes:

*Preliminary soil cleanup levels are discussed in the Remedial Investigation (RI) report. See Table 1 of RI report.

mg/kg = Milligrams per kilogram

ug/kg = Micrograms per kilogram

ng/kg = Nanograms per kilogram

TCLP = Toxicity Characteristic Leaching Procedure

TEQ = Toxicity Equivalent Quotient

TEF = Toxicity Equivalency Factor

MTCA = Model Toxics Control Act

cPAH and dioxin/furan TEQ values for samples with at least one positive cPAH or dioxin/furan detection were calculated using MTCA TEF values in effect as of January 2008 (see Table 2, Draft Final RI).

Blue text = Value exceeds MTCA terrestrial ecological criteria only (criteria are in Table 1 of RI report).

Red text = Value exceeds MTCA terrestrial ecological and human health criteria, or human health criteria only if no terrestrial ecological criteria established or if

terrestrial ecological criteria are greater than the human health criteria (criteria are in Table 1 of RI report).

-- = Not analyzed/site-specific cleanup level not established

U = The constituent was analyzed, but was not detected above the specified method reporting limit.

J = Estimated value reported below method reporting limit, or estimated based on data quality assessment.

TABLE A-4 WATER ANALYTICAL DATA SUMMARY - SEPTEMBER 2008 FORMER SCOTT PAPER COMPANY MILL SITE

		Sample Location	GEI-24 (a)	(b)
	Preliminary Groundwater	Sample Name	GEI24-W	RINSATE
	Cleanup Level*	Sample Date	10-Sep-08	09-Sep-08
Total Petroleum Hydrocarbons (mg/L)				
Diesel-range	0.5		1.8	<0.25 U
Motor oil-range	0.5		3.2	<0.50 U
Metals (mg/L)				
Arsenic				<0.002 U
Copper				0.004
Lead				<0.002 U
Zinc				<0.01 U
Carcinogenic Polycyclic Aromatic Hydroca	arbons (cPAHs) (ug/L)			
Benzo(a)anthracene				<0.10 U
Benzo(a)pyrene				<0.10 U
Benzo(b)fluoranthene				<0.10 U
Benzo(k)fluoranthene				<0.10 U
Chrysene				<0.10 U
Dibenzo(a,h)anthracene				<0.10 U
Indeno(1,2,3-cd)pyrene				<0.10 U

Notes:

(a) Groundwater grab sample obtained from direct-push boring

(b) Equipment rinsate blank (field quality control sample)

*Preliminary groundwater cleanup levels are discussed in the Remedial Investigation (RI) report. See Table 4 of RI report.

mg/L = Milligrams per liter

ug/L = Micrograms per liter

MTCA = Model Toxics Control Act

Red text = Value exceeds MTCA human health criteria (criteria are in Table 4 of RI report).

-- = Not analyzed/not applicable

U = The constituent was analyzed, but was not detected above the specified method reporting limit.







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ATTACHMENT 1 Boring Logs

	SO	IL CLASSIF	ADDITIONAL MATERIAL SYMBOLS					
М	AJOR DIVISI	ONS	SYME GRAPH	OLS LETTER	TYPICAL DESCRIPTIONS	SYM GRAPH	BOLS LETTER	TYPICAL DESCRIPTIONS
	GRAVEL	CLEAN GRAVELS		GW	WELL-GRADED GRAVELS, GRAVEL - SAND MIXTURES		сс	Cement Concrete
	AND GRAVELLY SOILS	(LITTLE OR NO FINES)		GP	POORLY-GRADED GRAVELS, GRAVEL - SAND MIXTURES		AC	Asphalt Concrete
COARSE GRAINED SOILS	MORE THAN 50% OF COARSE	GRAVELS WITH FINES		GM	SILTY GRAVELS, GRAVEL - SAND - SILT MIXTURES		CR	Crushed Rock/ Quarry Spalls
	FRACTION RETAINED ON NO. 4 SIEVE	(APPRECIABLE AMOUNT OF FINES)		GC	CLAYEY GRAVELS, GRAVEL - SAND - CLAY MIXTURES		тѕ	Topsoil/
	SAND	CLEAN SANDS		SW	WELL-GRADED SANDS, GRAVELLY SANDS			Forest Duil/Sou
RETAINED ON NO. 00 SIEVE	AND SANDY SOILS	(LITTLE OR NO FINES)		SP	POORLY-GRADED SANDS, GRAVELLY SAND	\Box	Measured	d groundwater level in on, well, or piezometer
	MORE THAN 50% OF COARSE FRACTION	SANDS WITH FINES		SM	SILTY SANDS, SAND - SILT MIXTURES		Groundw	ater observed at time of
	PASSING NO. 4 SIEVE	(APPRECIABLE AMOUNT OF FINES)		SC	CLAYEY SANDS, SAND - CLAY MIXTURES		Perched v	water observed at time of
				ML	INORGANIC SILTS, ROCK FLOUR, CLAYEY SILTS WITH SLIGHT PLASTICITY		Measured	d free product in well or
FINE	SILTS AND CLAYS	LIQUID LIMIT LESS THAN 50		CL	INORGANIC CLAYS OF LOW TO MEDIUM PLASTICITY, GRAVELLY CLAYS, SANDY CLAYS, SILTY CLAYS, LEAN CLAYS	_	piezomet	
SOILS				OL	ORGANIC SILTS AND ORGANIC SILTY CLAYS OF LOW PLASTICITY		Stratigra	aphic Contact
MORE THAN 50% PASSING NO. 200				МН	INORGANIC SILTS, MICACEOUS OR DIATOMACEOUS SILTY SOILS		Distinct of geologic	contact between soil strat units
SIEVE	SILTS AND CLAYS	LIQUID LIMIT GREATER THAN 50		СН	INORGANIC CLAYS OF HIGH PLASTICITY		Gradual o geologic	change between soil strat units
			hip	ОН	ORGANIC CLAYS AND SILTS OF MEDIUM TO HIGH PLASTICITY		Approxim change w	nate location of soil strata vithin a geologic soil unit
н	GHLY ORGANIC	SOILS	<u> </u>	РТ	PEAT, HUMUS, SWAMP SOILS WITH HIGH ORGANIC CONTENTS			
OTE: Multiple	e symbols are u	sed to indicate bo	rderline or c	lual soil cl	assifications	<u>La</u>	aborator	y / Field Tests
	Sample	r Symbol De	escriptio	ons		%F AL	Percent f Atterberg	ines limits analysia
	2.4-	-inch I.D. split I	barrel	SDT)		CA CP CS	Laborato Consolid	ry compaction test ation test
		elby tube		511)		DS HA	Direct sh Hydrome	ear ter analysis
	Pis	ton				MC MD	Moisture Moisture	content content and dry density
	Dire	ect-Push				PM PP	Permeab	ility or hydraulic conducti
	Bul	k or grab				SA TX	Sieve ana Triaxial c	alysis ompression
Blow of blo distan and d A "P" drill r	count is reco ows required nce noted). { Irop. ' indicates sa ig.	orded for driver to advance sa See exploratior Impler pushed	n sampler: mpler 12 i n log for h using the	s as the nches (o ammer weight	number or weight of the	VS NS SS MS HS NT	Vane she Sheen C No Visibl Slight Sh Moderate Heavy Sh Not Teste	Classification Classification e Sheen esh Sheen een een een
NOTE: The Description representat	e reader must n s on the logs ap tive of subsurfa	efer to the discus pply only at the sp ce conditions at o	sion in the r becific explo ther locatio	eport text pration loc ns or time	and the logs of explorations f ations and at the time the exp s.	or a proper unde lorations were m	rstanding o ade; they a	f subsurface conditions. re not warranted to be
			KEY	то	EXPLORATIO	N LOG	5	
C	GEOEN	IGINEE	RS /	7			Figu	re A-1

Figure A-1



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Figure A-2 Sheet 1 of 1



Project Location: Anacortes, Washington

Project Number: 5147-007-03

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GEOENGINEERS

Figure A-3 Sheet 1 of 1



ENVBORING W:\SEATTLE\PROJECTS\5\5\147007\03\FINALS\5\14700703.GPJ GEIV6_1.GDT 10/24/08

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Figure A-5 Sheet 1 of 1



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Figure A-6 Sheet 1 of 1



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Figure A-7 Sheet 1 of 1



Project Location: Anacortes, Washington

Project Number: 5147-007-03

ENVBORING W:\SEATTLE\PROJECTS\5\5\147007\03\FINALS\5\14700703.GPJ GEIV6_1.GDT 10/24/08

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GEOENGINEERS

Figure A-8 Sheet 1 of 1







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Project Number: 5147-007-03

Figure A-12 Sheet 1 of 1





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Figure A-14 Sheet 1 of 1



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Figure A-15 Sheet 1 of 1









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Figure A-19 Sheet 1 of 1



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Figure A-20 Sheet 1 of 1



Figure A-21

Sheet 1 of 1

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Figure A-24 Sheet 1 of 1



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ATTACHMENT 2 DATA QUALITY ASSESSMENT SUMMARY



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www.geoengineers.com

To:	Cindy Bartlett and Rob Leet
FROM:	Tonya Kauhi
DATE:	October 29, 2008
FILE:	5147-007-03
SUBJECT:	Former Scott Paper Mill Site – Data Quality Assessment Summary

This memorandum presents a summary of the analytical data quality assessment for soil and water samples collected by GeoEngineers, Inc. on September 8-10, 2008, at the Port Uplands Area of the Former Scott Paper Mill Site in Anacortes, Washington. The samples were submitted to Analytical Resources, Inc. (ARI) in Tukwila, Washington. Chemical analyses were performed by ARI and two laboratories subcontracted by ARI: Fremont Analytical (Seattle, Washington) and Pace Analytical (Minneapolis, Minnesota). Thirty-nine (39) soil samples and two (2) water samples were analyzed by one or more of the following analytical methods:

- Total metals by EPA Method 6020
- Lead by EPA Method 1311/6020 (TCLP extraction)
- Petroleum hydrocarbons by Ecology Method NWTPH-D
- Polycyclic aromatic hydrocarbons by EPA Method 8270-SIM
- Dioxin/furans by EPA Method 8290

OBJECTIVE

The objective of the data quality assessment was to review laboratory analytical procedures and quality control (QC) results to evaluate whether:

- The samples were analyzed using well-defined and acceptable methods that provide detection limits below applicable regulatory criteria;
- The precision and accuracy of the data are well defined and sufficient to provide defensible data; and
- The quality assurance/quality control (QA/QC) procedures utilized by the laboratory meet acceptable industry practices and standards.

DATA ASSESSMENT CRITERIA

The following QC elements were reviewed:

- Chain-of-custody (COC) documentation
- Temperature preservation and holding times
- Method blanks
- Surrogate recoveries

Memorandum to Cindy Bartlett and Rob Leet October 29, 2008 Page 2

- Matrix spikes/matrix spike duplicates (MS/MSD)
- Laboratory control samples
- Laboratory replicates/duplicates

DATA QUALITY ASSESSMENT SUMMARY

The results for each of the QC elements are summarized below. The data assessment was performed using guidance in *the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review* (USEPA 2002) and USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (USEPA 1999).

Chain-of-Custody Documentation:

COC forms were provided with the laboratory analytical reports. There were no anomalies noted on the COC forms; proper COC protocols appear to have been followed.

Temperature Preservation and Holding Times:

According to the cooler receipt form, the measured cooler temperatures were 20.8 (cooler #1) and 18.6 (cooler #2) degrees Celsius. Guidance suggests that when temperatures exceed the acceptable range, non-detect results should be qualified as unusable ("R" flag) and detected results should be considered estimated values and qualified with a "J" flag, based on the reviewer's professional judgment. The basis for rejection depends on a variety of factors including the duration of elevated temperatures, the magnitude of the temperature exceedance, the matrix being analyzed, the amount of head space in the sample container, and the class of target analytes (i.e., non-volatile or semivolatile compounds versus volatile compounds).

In this instance, the samples were stored on ice from the time the samples were collected until they were delivered to the analytical laboratory. On the afternoon that the samples were delivered to the laboratory, the samples were transferred to different coolers and repacked with ice approximately 2 hours before the coolers were dropped off at the laboratory. The laboratory measured and recorded the ambient cooler temperatures, not the temperature of the samples. Since it can take approximately 6 to 8 hours for ambient cooler temperatures to reach the recommended temperature range of 2 to 6 degrees Celsius after being loaded with ice, the measured cooler temperatures likely did not accurately reflect the temperature of the samples. Accordingly, no data were qualified based on temperature preservation.

Samples GEI23-6-10 and GEI23-10-14 were extracted and analyzed outside of the recommended holding time of 14 days. The samples were extracted within 41 days of sampling. Guidance suggests that if holding times are grossly exceeded (e.g., by greater than two times the recommended holding time), non-detect results should be qualified as unusable ("R" flag) and detected results should be considered estimated values and qualified with a "J" flag. Based on these criteria the following actions were taken:

• The non-detect results for benzo(a)anthracene in sample GEI23-6-10 were qualified as unusable ("R" flag), and the detected results for benzo(a)anthracene, chrysene, benzo(b)fluoranthene, benzo(k)-fluoranthene, indeno(1,2,3-cd)pyrene, and dibenzo(a,h)anthracene in sample GEI23-6-10 were qualified as estimated ("J" flag).

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• The detected results for benzo(a)anthracene, chrysene, benzo(b)fluoranthene, benzo(k)fluoranthene, indeno(1,2,3-cd)pyrene, and dibenzo(a,h)anthracene in sample GEI23-10-14 were qualified as estimated ("J" flag).

All other samples were analyzed within recommended holding times.

Method Blanks:

Several polychlorodibenzo-p-dioxins/polychlorodibenzofurans (PCDD/PCDF) congeners were detected in an associated method blank sample (Blank-17755). Since the sample results for these congeners were greater than five times the blank result, the sample results were not qualified.

No additional method blank detections were reported.

Surrogate Recoveries:

Surrogates are only evaluated for organic analyses. No surrogate recovery exceedances were reported.

Matrix Spikes/Matrix Spike Duplicates (MS/MSD):

No MS/MSD spike exceedances were reported.

Laboratory Control Samples (LCS):

No laboratory control sample spike exceedances were reported.

Laboratory Replicates/Duplicates:

The relative percent difference (RPD) values for lead exceeded the control limit of 30% in sample GEI22-6-9 due to sample matrix effects. Guidance suggests if the results from a duplicate analysis exceed the control limit, detected results should be qualified as estimated ("J" flag), and the reporting limit for non-detect results should be qualified as estimated ("UJ" flag). Based on these criteria, the detected lead result in sample GEI22-6-9 was qualified as estimated ("J" flag).

No additional laboratory replicate exceedances were reported.

Additional Data Quality Issues:

The laboratory flagged several PCDD and PCDF results with an "I" (interference present) or "E" (polychlorinated diphenyl ether [PCDE] interference) where interfering substances reduced confidence in the sample result. Consequently, we qualified the results for the samples listed below as estimated ("J" flag).

Sample Location	Start Depth (Feet)	End Depth (Feet)	Analyte
GEI-1	2	6	1,2,3,7,8,9-HxCDD
GEI-1	10	14	1,2,3,7,8-PeCDD
GEI-1	10	14	2,3,7,8-TCDF

GEI-1	10	14	2,3,4,7,8-PeCDF
GEI-1	2	6	1,2,3,7,8-PeCDF
GEI-1	2	6	1,2,3,6,7,8-HxCDF
GEI-1	10	14	2,3,4,6,7,8-HxCDF
GEI-1	10	14	1,2,3,4,6,7,8-HpCDF
GEI-1	2	6	1,2,3,4,7,8-HxCDF
GEI-1	10	14	1,2,3,4,7,8-HxCDF
GEI-2	6	10	1,2,3,6,7,8-HxCDF
GEI-2	6	10	2,3,4,7,8-PeCDF
GEI-2	6	10	1,2,3,6,7,8-HxCDD
GEI-2	6	10	1,2,3,7,8-PeCDD
GEI-2	6	10	1,2,3,4,7,8-HxCDF
GEI-2	6	10	1,2,3,4,6,7,8-HpCDF
GEI-3	6	10	1,2,3,4,7,8-HxCDF
GEI-3	6	10	2,3,4,7,8-PeCDF
GEI-3	10	14	2,3,4,7,8-PeCDF
GEI-3	6	10	2,3,7,8-TCDF
GEI-3	10	14	1,2,3,7,8,9-HxCDD
GEI-3	10	14	1,2,3,4,6,7,8-HpCDF
GEI-3	10	14	2,3,4,6,7,8-HxCDF
GEI-3	10	14	1,2,3,7,8-PeCDF
GEI-4	6	10	1,2,3,6,7,8-HxCDF
GEI-4	6	10	2,3,4,6,7,8-HxCDF
GEI-4	6	10	1,2,3,6,7,8-HxCDD
GEI-4	6	10	1,2,3,7,8-PeCDD
GEI-4	6	10	1,2,3,4,6,7,8-HpCDF
GEI-5	6	10	1,2,3,4,7,8-HxCDF
GEI-5	6	10	1,2,3,7,8-PeCDD
GEI-5	6	10	2,3,7,8-TCDD
GEI-6	6	10	2,3,7,8-TCDF
GEI-6	6	10	2,3,4,7,8-PeCDF
GEI-6	6	10	1,2,3,4,7,8-HxCDF
GEI-8	6	10	2,3,4,6,7,8-HxCDF
GEI-8	6	10	1,2,3,4,7,8,9-HpCDF
GEI-10	6	10	1,2,3,6,7,8-HxCDF
GEI-12	6	10	1,2,3,7,8-PeCDF
GEI-12	6	10	1,2,3,7,8,9-HxCDD
GEI-12	6	10	1,2,3,4,7,8-HxCDD
GEI-13	6	10	1,2,3,4,7,8-HxCDD
GEI-13	6	10	1,2,3,7,8-PeCDF

CONCLUSIONS

The analytical data generated during the September 2008 supplemental soil investigation at the Port Uplands Area of the Former Scott Paper Mill Site are useable for decision-making purposes. This data quality assessment was performed by GeoEngineers, Inc. using best professional judgment. Data users may review and re-interpret data quality for specific uses.