

2022 ANNUAL REPORT FOR GROUNDWATER MONITORED NATURAL ATTENUATION

Pulp & Tissue Mill RAU, Georgia-Pacific West Site

Prepared for: Port of Bellingham

Project No. 140298-A-19 • February 14, 2023 • Final



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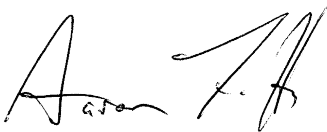
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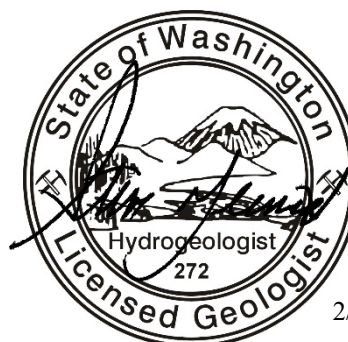
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Aspect Consulting, LLC



Aaron Fitts, LEG
Project Geologist
afitts@aspectconsulting.com



2/14/2023

Steve J. Germiot

Steve Germiot, LHG
Principal Hydrogeologist
sgermiot@aspectconsulting.com

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1 Background for Groundwater Monitoring Program

This report presents results from the 2022 compliance monitoring for the groundwater monitored natural attenuation (MNA) cleanup action selected by the Washington State Department of Ecology (Ecology) for the Pulp and Tissue Mill (PTM) Remedial Action Unit (RAU) at the Georgia-Pacific West Site (Site). The PTM RAU is being cleaned up under the terms of Consent Decree No. 14207008 (Decree) between the Port of Bellingham (Port) and Ecology. Monitoring of the groundwater MNA cleanup action is being conducted by Aspect Consulting, LLC (Aspect) in accordance with the Compliance Monitoring Plan for Groundwater MNA (CMP; Aspect, 2015), which was reviewed and approved by Ecology prior to initiation of the monitoring program.

As described in the Cleanup Action Plan for the PTM RAU (CAP; Ecology, 2014), the highest beneficial use of Site groundwater is discharge to marine water and sediment, not potable use, and groundwater cleanup levels (CULs) for the PTM RAU were established accordingly. Groundwater CULs for individual contaminants are included in the data tables for this report (Tables 1 and 2).

At the time of the CAP preparation in 2014, the contaminants that exceeded CULs in PTM RAU groundwater included:

- Acidic pH and selected metals in the Acid Plant Subarea
- Chlorinated solvent volatile organic compounds (VOCs) tetrachloroethene (PCE) and vinyl chloride (VC) in the LP-MW01 Subarea
- Selected metals in the Miscellaneous Dissolved Metals Exceedances Area (termed here Miscellaneous Metals Area).

Figure 1 depicts the locations of these three areas. Subsequent to the CAP, chlorinated VOC concentrations in the LP-MW01 Subarea were demonstrated to meet groundwater cleanup levels by the end of the 2017 monitoring period; therefore, monitoring for that subarea was terminated, as documented in the 2017 MNA Monitoring Annual Report (Aspect, 2018a). The LP-MW01 Subarea is therefore not discussed further in this report.

As described in the 2017 MNA Monitoring Annual Report (Aspect, 2018a), wells AA-MW01 through AA-MW04, FH-MW01, and GF-MW01 were decommissioned in 2016 prior to construction of the RAU-wide environmental cap and, following cap construction, were replaced with wells that were essentially identical in construction and location. The replacement well names included an 'R' suffix (e.g., AA-MW01R). Wells AA-MW01R and FH-MW01R were subsequently decommissioned in early 2021 to accommodate construction of Harcourt Development's (Harcourt) Granary Avenue Waterfront Residential project, the outline of which is depicted on Figure 1. Those wells will be reestablished for monitoring, in consultation with Ecology, following completion of that redevelopment project. Figure 1 depicts locations of the monitoring wells that have been and are currently being monitored during the MNA program, including wells that were not accessible for monitoring during the 2022 monitoring.

This report documents the groundwater MNA compliance monitoring data collected to date and, in accordance with Section 2.2 of the CMP, presents the plan for the next year of monitoring.

Following this Background section, the structure of the report is as follows:

- Section 2 – Describes the groundwater sampling and analysis completed in 2022.
- Section 3 – Contains an evaluation of the groundwater analytical data with respect to compliance with CULs and long-term trends.
- Section 4 – Presents the plan for monitoring in 2023.

2 2022 Groundwater Sampling and Analysis

In accordance with the CMP (Aspect, 2015) and the findings from the 2021 MNA Monitoring Annual Report (Aspect, 2022), semiannual groundwater monitoring was performed in April and October of 2022. The wells sampled are depicted on Figure 1 and their chemical analyses¹ in 2022 were as follows:

Acid Plant Subarea

- Within the active construction area for Harcourt’s residential redevelopment project, wells FH-MW01R and AA-MW01R were previously decommissioned and, therefore, could not be monitored in 2022. In addition, wells GF-MW01R and BC-MW05 remained inaccessible for monitoring in 2022 because they are located within the active construction area (fenced area).
- The two groundwater samples from well AA-MW04R was analyzed for five dissolved metals: arsenic, cadmium, copper, nickel, and zinc.
- Because wells AA-MW04R and FH-MW01R did not yet meet cleanup levels at the end of 2021, the following wells positioned outside the Acid Plant Subarea were also monitored in accordance with the CMP:
 - Crossgradient from the Acid Plant Subarea, groundwater parameters, including pH, were measured in the field at wells AA-MW02R and AA-MW03R.² If the field measurement of groundwater pH was less than pH 6.2 in a well, then that well was sampled for analysis of the same five dissolved metals as were analyzed at AA-MW04R. During 2022:

¹ Groundwater parameters (temperature, pH, electrical conductance, and oxidation reduction potential [ORP]) were also measured in the field for each monitoring location and event. Dissolved oxygen was measured in the October 2022 event, but the dissolved oxygen probe was not functioning during the April event.

² Well AA-MW03R had pH exceeding the CUL, but no dissolved metals exceedances during the RI/FS period (2009–2013), so is considered on the edge of the Acid Plant Subarea.

- ♦ Well AA-MW03R had a measured pH less than 6.2 during the April and October 2022 monitoring events, so groundwater samples were collected for analysis of the five dissolved metals during both events.
- ♦ Well AA-MW02R had a pH of greater than 6.2 during both monitoring events in 2022. Regardless of pH, well AA-MW02R was sampled for dissolved copper during each round to provide monitoring downgradient of the Miscellaneous Metals Area as required by the CMP and as described below.

Miscellaneous Metals Area

- Within the Miscellaneous Metals Area, groundwater samples from wells LP-MW01 and SC-MW02R were analyzed for dissolved copper.
- Because wells LP-MW01 and SC-MW02R did not meet CULs at the end of 2021, downgradient wells LB-MW01R and AA-MW02R were sampled for dissolved copper in accordance with the CMP.

3 Data Evaluation

The following subsections describe the analytical results from the 2022 groundwater monitoring events for the Acid Plant Subarea and Miscellaneous Metals Area. The 2022 results are compared with CULs and with data from prior monitoring events to assess temporal trends in groundwater pH and metals concentrations. Tables 1 and 2 present the analytical results over the entire period of monitoring for the Acid Plant Subarea and Miscellaneous Metals Area, respectively.

Based on Aspect's independent quality assurance validation of the 2022 analytical data, no data were qualified, and the data are usable for their intended purpose. Appendix A provides Aspect's data validation report and the laboratory reports generated by OnSite Environmental³ for the two rounds of 2022 analytical data.

3.1 Acid Plant Subarea

3.1.1 pH

The groundwater pH exceeded the CUL (pH 6.2)⁴ in well AA-MW04R, located within the acidic source area,⁵ and at crossgradient well AA-MW03R,⁶ during both 2022 monitoring events. The crossgradient shoreline well GF-MW01R, located mill-west of

³ An analytical laboratory accredited by Ecology and located in Redmond, Washington.

⁴ While the term "exceedance" typically refers to a measurement greater than a cleanup level, for acidic pH, it refers to a measurement less than the pH 6.2 CUL.

⁵ The 2004 data from the acidic source area are from well GF-MW02, which was located just mill-west of well AA-MW04/04R (Figure 1), but which could not be found at the start of the RI in 2009.

⁶ This well has data from 2009 to 2022 only; there was not a monitoring well in the AA-MW03R location in 2004.

the Acid Plant Subarea, could not be monitored in 2022 as described in Section 2. The measured pH met the CUL at the crossgradient inland well AA-MW02R during both 2022 monitoring events.

Within the Acid Plant Subarea as a whole, measured pH levels show a gradual, long-term improvement (increase in pH) relative to the earliest measurements in 2004, but with considerable short-term variation. Figure 2 graphically illustrates the long-term pH trends at three well locations within the Subarea since their monitoring began (2004 for AA-MW04R and FH-MW01R⁷; 2009 for AA-MW03R). On all figures in this report, the groundwater pH vertical axis is plotted in reverse order, so that points higher on the axis are farther from the CUL (pH 6.2), consistent with how metals concentrations are plotted. The average annual groundwater pH in these three pH-impacted wells over the past 5 years (no data from decommissioned well FH-MW01R over past 2 years) are tabulated below.

Well	Area represented by samples from well	Average Annual Groundwater pH (CUL = 6.2)				
		2018	2019	2020	2021	2022
AA-MW04R	Acidic metals plume source	4.8	5.5	6.3	5.8	6.4
FH-MW01R	Downgradient from source	5.5	5.7	5.0	NA	NA
AA-MW03R	Crossgradient from source	4.5	5.6	5.8	6.2	5.7

NA: Not monitored.

Observations regarding groundwater pH for wells AA-MW-04R and AA-MW03R are as follows:

- Within the footprint of the historical Acid Plant where the release(s) of acid occurred (“source area” well AA-MW04R), the pH readings measured during both 2022 monitoring events (6.23 and 6.73) were greater than the CUL for the first time in the entire 18-year monitoring period (Table 1). Despite the anomalously low pH of 5.5 measured in October 2021, the acidic pH within the source area is trending toward near-neutral (Figure 2).
- The 2022 measurements from crossgradient well AA-MW03R reversed the trend of increasing pH observed between 2018 and 2021, with the October 2022 reading (pH 5.55) being the lowest value measured since October 2019 (pH 5.47) (Table 1).

3.1.2 Dissolved Metals

AA-MW04R

The 2022 dissolved metals concentrations detected at source area well AA-MW04R were lower than measured during October 2021, and the October 2022 sample was the first, over the 18-year period of monitoring, in which the concentration of every metal met its CUL (Table 1).

Plotting the groundwater pH and the summed concentrations of the five dissolved metals monitored (arsenic, cadmium, copper, nickel, zinc) over time illustrates a general

⁷ Combining data from original wells and replacement wells in those locations.

improvement in groundwater quality since the October 2016 concentration spike created by formation disturbance during drilling of replacement well AA-MW04R, which was described in the 2018 MNA Monitoring Annual Report (Aspect, 2018b). A general correlation between lower pH and higher metals concentrations is also apparent over the past 5 years of data, although the correlation is not perfect (Figure 3).⁸

FH-MW01R

Well FH-MW01R was inaccessible and could not be sampled in 2022, as described in Section 2. Accordingly, no analysis of metals trends beyond that presented in the 2020 MNA Monitoring Annual Report (Aspect, 2021) can be conducted.

AA-MW03R

At well AA-MW03R, located on the mill-east edge of the Acid Plant Subarea (Figure 1), the concentrations of dissolved metals were less than CULs (most were nondetect) despite the pH being less than the pH 6.2 CUL during both events. The data indicate that the elevated dissolved nickel concentrations first observed in April 2018, and resulting from the City of Bellingham's adjacent Granary Avenue-Laurel Street (GALS) construction as first described in Aspect's 2018 Annual Report (2018b), have abated (Table 1).

AA-MW01R

Shoreline well AA-MW01R could not be sampled in 2022 as described in Section 2. Accordingly, no analysis of metals trends beyond that presented in the 2020 Annual Report (Aspect, 2021) can be conducted. Following a 2018 spike in dissolved nickel attributable to GALS construction, all metals were nondetect at this shoreline well during each of the five monitoring events from January 2019 through April 2020 (Table 1).

Other Cross-Gradient and Downgradient Wells

During both 2022 monitoring events, dissolved copper remained nondetect at well AA-MW02R located mill-east of the Acid Plant Subarea (Figure 1). Wells GF-MW01R and BC-MW05 were inaccessible and could not be monitored in 2022, as described in Section 2.

3.2 Miscellaneous Metals Area

The Miscellaneous Metals Area encompasses two wells, LP-MW01 and SC-MW02R, that had low-level exceedances of selected metals without pH impacts during the Site remedial investigation/feasibility study (RI/FS).

LP-MW01

Groundwater pH at well LP-MW01 complied with the CUL during both 2022 monitoring events, consistent with prior data. The dissolved copper concentrations detected in the April and October 2022 samples both exceeded the CUL, with the 25 micrograms per

⁸ Figure 3 does not extend back to 2004 because adjacent 2004 well GF-MW02 never had elevated metals concentrations in groundwater, despite having highly acidic groundwater, so it is not meaningful to combine those data for analysis of long-term metals trends back to 2004.

liter ($\mu\text{g/L}$) October result being the highest measured concentration since 2004. The cause of the anomalous dissolved copper result is not known; however, the seasonal pattern of higher concentrations in the dry season versus the wet season continues with the 2022 monitoring data (Table 2). The anomalously high October 2022 result also reverses the general trend of declining average annual copper concentrations that had been observed between 2017 and 2021, as indicated in the tabulation below.

Year	Average Annual Copper in $\mu\text{g/L}$
2017*	7.7
2018	7.5
2019	6.2
2020	6.0
2021	5.8
2022	14.5

* 2017 average includes October 2016 data (see Table 2)

SC-MW02R

At well SC-MW02R, the dissolved copper concentration was slightly below the CUL during the April sampling event, but above it during the October event ($2.5 \mu\text{g/L}$ and $6.6 \mu\text{g/L}$, respectively; Table 2). The resulting 2022 average annual copper concentration ($4.6 \mu\text{g/L}$) is above the CUL and slightly higher than measured in 2020 and 2021, as noted in the tabulation below.

Year	Average Annual Copper in $\mu\text{g/L}$
2017*	3.9
2018	7.8
2019	7.8
2020	3.1
2021	2.6
2022	4.6

* 2017 average includes October 2016 data (see Table 2)

Downgradient Wells AA-MW02R and LB-MW01R

At well AA-MW02R, downgradient of the Miscellaneous Metals Area, dissolved copper remained nondetect, consistent with prior results (Table 2).

At the other downgradient well, LB-MW01R, dissolved copper was less than the CUL during the April sampling event ($1.9 \mu\text{g/L}$), but above it during the October sampling event ($5.2 \mu\text{g/L}$)—the opposite of the relative change observed between those months in 2021 (Table 2). The 2022 average annual dissolved copper concentration at the well was slightly lower than measured in the past 6 years, as indicated in the tabulation below.

Year	Average Annual Copper in µg/L
2017*	5.2
2018	5.6
2019	5.0
2020	5.6
2021	4.6
2022	3.6

* 2017 average includes October 2016 data (see Table 2)

4 Plan for 2023 MNA Monitoring

Following completion of the 2022 MNA monitoring, no wells or analytes qualify for exclusion from the monitoring program based on the decision framework of the CMP (Aspect, 2015). As described in the 2015 CMP and reiterated above, wells AA-MW02R, AA-MW03R, and LB-MW01 must be monitored until other specified wells reach CULs.

Consequently, the semiannual monitoring program conducted in 2022 will be repeated in 2023—the same analytes will be measured from the same wells in April and October 2023, as indicated in Table 3.

Following receipt of data from the 2023 monitoring events, an annual report will be prepared that analyzes the collective data and re-evaluates the scope of the monitoring program for the subsequent (2024) monitoring, in accordance with the CMP.

5 References

- Aspect Consulting, LLC (Aspect), 2015, Compliance Monitoring Plan for Groundwater Monitored Natural Attenuation, Pulp & Tissue Mill RAU, Georgia-Pacific West Site, July 7, 2015.
- Aspect Consulting, LLC (Aspect), 2018a, 2017 Annual Report for Groundwater Monitored Natural Attenuation, Pulp & Tissue Mill RAU, Georgia-Pacific West Site, January 3, 2018.
- Aspect Consulting, LLC (Aspect), 2018b, 2018 Annual Report for Groundwater Monitored Natural Attenuation, Pulp & Tissue Mill RAU, Georgia-Pacific West Site, December 17, 2018.
- Aspect Consulting, LLC (Aspect), 2020, 2019 Annual Report for Groundwater Monitored Natural Attenuation, Pulp & Tissue Mill RAU, Georgia-Pacific West Site, January 17, 2020.
- Aspect Consulting, LLC (Aspect), 2021, 2020 Annual Report for Groundwater Monitored Natural Attenuation, Pulp & Tissue Mill RAU, Georgia-Pacific West Site, January 19, 2021.
- Aspect Consulting, LLC (Aspect), 2022, 2021 Annual Report for Groundwater Monitored Natural Attenuation, Pulp & Tissue Mill RAU, Georgia-Pacific West Site, February 15, 2022.
- Washington State Department of Ecology (Ecology), 2014, Cleanup Action Plan, Pulp/Tissue Mill Remedial Action Unit, Georgia-Pacific West Site, Bellingham, Washington, Exhibit B to Consent Decree No. 14207008, October 30, 2014.

6 Limitations

Work for this project was performed for the Port of Bellingham (Client), and this report was prepared in accordance with generally accepted professional practices for the nature and conditions of work completed in the same or similar localities, at the time the work was performed. This report does not represent a legal opinion. No other warranty, expressed or implied, is made.

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TABLES

Table 1. Groundwater Chemistry Data for Acid Plant Subarea

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Within Acidic Metals Plume												
			GF-MW02	AA-MW04				AA-MW04R							
			07/25/04	09/29/09	03/30/10	02/25/15	10/14/16	11/02/16	01/11/17	04/17/17	07/05/17	01/24/18	04/23/18	07/10/18	10/02/18
Field Parameters															
pH	pH units	6.2	3.34	4.18	4.49	4.50	4.34	4.38	4.51	4.53	4.45	4.58	4.54	5.5	6.5
Temperature	deg C		18.87	15.35	11.12	11.0	15.49	15.48	8.81	11.1	15.95	10.9	12.8	15.1	15.7
Specific Conductance	uS/cm		2442	2345	1716	538.7	2900.6	2123.3	1527.3	1195	1095.6	835	981	1150	1088
Dissolved Oxygen	mg/L		1.55	1.23	0.38	0.51	0.12	0.14	0.15	0.26	0.13	0.4	0.3	0.1	0.11
ORP	mV		393.7	-164	277.9	74.7	204.2	167.4	136.1	158.3	135.4	83	62	44	-177
Turbidity	NTU		5	10	20	2	22	7	13	--	6	--	20	35	0.02
Metals															
Arsenic (Dissolved)	ug/L	5	38	4.73	48	5.3	83	17	6.4	7.1	25	14	3.0 U	8.1	17
Cadmium (Dissolved)	ug/L	8.8	81.1	1650	74.3	7.8	5000	920	120	49	20	14	9.4	47	4.0 U
Copper (Dissolved)	ug/L	3.1	795	2.78	179	1.4	15000	3900	1000	420	240	120	170	130	3.8
Nickel (Dissolved)	ug/L	8.2	626	1560	108	19	1400	320	65	39	42	24	13	83	4.0 U
Zinc (Dissolved)	ug/L	81	2440	7420	836	82	10000	1800	440	250	330	150	83	330	25 U

Analyte	Units	Groundwater Cleanup Level	Wells Within Acidic Metals Plume									
			AA-MW04R (continued)									
			01/13/19	04/08/19	07/24/19	10/09/19	04/21/20	10/07/20	04/29/21	10/20/21	04/27/22	10/26/22
Field Parameters												
pH	pH units	6.2	5.93	5.08	6.28	5.68	6.13	6.43	6.30	5.53	6.23	6.73
Temperature	deg C		12.66	10.6	16.8	15.9	11.4	16.3	12.1	16.1	11.1	15.3
Specific Conductance	uS/cm		1254	1478	1149	1126	770	838	748	823	1022	967
Dissolved Oxygen	mg/L		0.14	0.22	0.61	0.19	0.93	0.28	0.23	0.11	--	0.27
ORP	mV		63	145	-9	68	-135	-39	-202	147	125	-42
Turbidity	NTU		29	17	15	46	12	8	3	4	5	11
Metals												
Arsenic (Dissolved)	ug/L	5	3.0 U	3.0 U	4.3	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	5.0	4.4
Cadmium (Dissolved)	ug/L	8.8	81	54	4.0 U	120	4.0 U	4.0 U	4.0 U	66	23	4.0 U
Copper (Dissolved)	ug/L	3.1	100	300	18	94	1.2	1.0 U	1.2	190	110	3.0
Nickel (Dissolved)	ug/L	8.2	93	60	18	130	38	21	24	44	18	4.0 U
Zinc (Dissolved)	ug/L	81	480	470	68	530	66	44	63	230	110	25 U

Table 1. Groundwater Chemistry Data for Acid Plant Subarea

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Within Acidic Metals Plume											
			FH-MW01				FH-MW01R							
			07/25/04	09/29/09	03/30/10	02/25/15	10/15/16	01/11/17	04/18/17	07/05/17	01/24/18	04/23/18	07/10/18	10/02/18
Field Parameters														
pH	pH units	6.2	4.11	4.36	4.64	5.27	4.92	5.16	5.41	5.08	5.46	5.52	5.35	5.7
Temperature	deg C		20.39	16.53	11.22	11.9	16.91	9.93	12.5	19.52	11.8	12.2	16.3	17.1
Specific Conductance	uS/cm		2305	2132	1613	1877	2085.4	1527.5	1348	1458.5	1152	1563	1899	2086
Dissolved Oxygen	mg/L		0.73	0.82	0.45	0.80	0.1	0.16	0.33	0.35	1.4	0.3	0.1	0.17
ORP	mV		261	-159	72	122	-155	44	83	-114	-22	-7	-57	-174
Turbidity	NTU		3.22	10	10	300	36.1	19.2	--	21.2	--	39	25	3.94
Metals														
Arsenic (Dissolved)	ug/L	5	2	2.72	0.5 U	3 U	3.0 U	3.0 U	3.0 U	3.0 U	5.3	15	88	20
Cadmium (Dissolved)	ug/L	8.8	0.2 U	0.02 U	0.443	4 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	5.9	4.0 U	4.0 U
Copper (Dissolved)	ug/L	3.1	0.8	1.55	1.55	1 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Nickel (Dissolved)	ug/L	8.2	405	209	459	190	140	69	59	77	54	6200	2700	1100
Zinc (Dissolved)	ug/L	81	760	616	1130	530	510	250	180	230	150	950	560	180

Analyte	Units	Groundwater Cleanup Level	Wells Within Acidic Metals Plume									
			FH-MW01R (continued)									
			01/14/19	04/08/19	07/24/19	10/09/19	04/22/20	10/07/20	04/29/21	10/20/21	04/27/22	10/26/22
Field Parameters												
pH	pH units	6.2	5.96	5.71	5.69	5.62	5.00	Not Monitored				
Temperature	deg C		10.82	11.9	16.8	16.7	11.7					
Specific Conductance	uS/cm		2291	2370	2110	1879	1005					
Dissolved Oxygen	mg/L		0.34	0.38	0.29	0.17	0.80					
ORP	mV		32	-10	-24	64	32					
Turbidity	NTU		37	40.5	34.1	11.8	17					
Metals												
Arsenic (Dissolved)	ug/L	5	29	35	25	27	46	Not Monitored				
Cadmium (Dissolved)	ug/L	8.8	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U					
Copper (Dissolved)	ug/L	3.1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U					
Nickel (Dissolved)	ug/L	8.2	2400	2500	990	850	590					
Zinc (Dissolved)	ug/L	81	810	1300	940	840	750					

Table 1. Groundwater Chemistry Data for Acid Plant Subarea

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Outside of Acidic Metals Plume										
			AA-MW01			AA-MW01R							
			09/29/09	03/30/10	02/25/15	10/15/16	01/11/17	04/17/17	07/06/17	01/24/18	04/23/18	07/10/18	10/02/18
Field Parameters													
pH	pH units	6.2	7.56	6.92	6.99	6.99	6.91	6.99	6.74	6.75	6.98	6.82	6.79
Temperature	deg C		18.45	12.8	11.9	16.36	11.01	12.9	17.18	12.9	13.3	16.1	17.5
Specific Conductance	uS/cm		746	848	1526	1503.7	1341.3	1333	1361.2	1586	1437	2720	5075
Dissolved Oxygen	mg/L		1.2	0.47	0.55	0.11	0.16	1	0.13	0.3	0.5	0.2	0.13
ORP	mV		-354	-113	9	-194	-33	-107	-81	-85	-49	-108	-210
Turbidity	NTU		10	10	1.39	27.3	37.3	--	4.54	--	14	12	16.4
Metals													
Arsenic (Dissolved)	ug/L	5	0.11 J	0.5 U	3 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	4.5	3.8	3.0 U
Cadmium (Dissolved)	ug/L	8.8	0.02 U	0.02 U	4 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U
Copper (Dissolved)	ug/L	3.1	0.3	0.58	1 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Nickel (Dissolved)	ug/L	8.2	0.84	1.62	4 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	130	16	11
Zinc (Dissolved)	ug/L	81	0.5 U	0.5 U	25 U	25 U	25 U	10 U	25 U	25 U	25.0 U	25 U	25 U

Analyte	Units	Groundwater Cleanup Level	Wells Outside of Acidic Metals Plume									
			AA-MW01R (continued)									
			01/13/19	04/08/19	07/24/19	10/10/19	04/21/20	10/07/20	04/29/21	10/20/21	04/27/22	10/26/22
Field Parameters												
pH	pH units	6.2	7.38	7.03	6.88	6.88	7.05	Not Monitored				
Temperature	deg C		13.33	12.4	18.4	17.5	12.8					
Specific Conductance	uS/cm		2575.2	1313	5253	5139	1201					
Dissolved Oxygen	mg/L		0.12	0.21	0.32	4.37	0.60					
ORP	mV		-79	-105	-85	41	-77					
Turbidity	NTU		28.8	18.2	9.4	0.88	1.6					
Metals												
Arsenic (Dissolved)	ug/L	5	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	Not Monitored				
Cadmium (Dissolved)	ug/L	8.8	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U					
Copper (Dissolved)	ug/L	3.1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U					
Nickel (Dissolved)	ug/L	8.2	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U					
Zinc (Dissolved)	ug/L	81	25 U	25 U	25 U	25 U	25 U					

Table 1. Groundwater Chemistry Data for Acid Plant Subarea

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Outside of Acidic Metals Plume															
			AA-MW02			AA-MW02R												
			10/01/09	04/01/10	02/25/15	10/14/16	04/17/17	07/05/17	01/24/18	04/24/18	07/10/18	10/03/18	01/13/19	04/08/19	07/24/19	10/09/19	04/22/20	10/07/20
Field Parameters																		
pH	pH units	6.2	7.23	7.24	7.32	7.35	7.41	7.19	7.18	7.33	7.1	7.2	7.56	7.24	7.21	7.25	7.25	7.27
Temperature	deg C		15.13	12.39	12.4	16.46	12.4	16.16	12.3	11.4	14.9	15.1	12.85	12	16.1	14.8	11.7	15.6
Specific Conductance	uS/cm		1337	984	1110	1204.2	1018	883.6	957	807	812	753	925.5	1041	1055	886	806	780
Dissolved Oxygen	mg/L		0.58	0.72	0.54	0.09	0.25	0.23	0.3	0.1	0.1	0.2	0.12	0.21	0.37	0.18	0.63	0.14
ORP	mV		-335.1	-239.1	0.3	-183.2	-41.5	-27.6	59	1	-11	-30.4	-133.1	-10	-42.9	26	13	-228
Turbidity	NTU		10	10	16.3	9.01	--	13.2	--	5	7	0.02	7.84	0.51	8.2	1.04	1.3	0.02
Metals																		
Arsenic (Dissolved)	ug/L	5	0.1 J	0.5 U	3 U	--	3.0 U	3.0 U	--	--	--	--	--	--	--	--	--	--
Cadmium (Dissolved)	ug/L	8.8	0.02 U	0.02 U	4 U	--	4.0 U	4.0 U	--	--	--	--	--	--	--	--	--	--
Copper (Dissolved)	ug/L	3.1	0.67	0.68	1 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Nickel (Dissolved)	ug/L	8.2	2.18	2.3	4 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	--	--
Zinc (Dissolved)	ug/L	81	0.4 J	0.6 J	25 U	--	10 U	25 U	--	--	--	--	--	--	--	--	--	--

Analyte	Units	Groundwater Cleanup Level	Wells Outside of Acidic Metals Plume			
			AA-MW02R (continued)			
			04/28/21	10/20/21	04/27/22	10/26/22
Field Parameters						
pH	pH units	6.2	7.50	7.24	7.40	7.29
Temperature	deg C		12.3	15.7	11.9	15.3
Specific Conductance	uS/cm		696	591.1	661	746
Dissolved Oxygen	mg/L		0.45	0.10	--	0.38
ORP	mV		68	91	-288	-191
Turbidity	NTU		2.8	0.02	2	6
Metals						
Arsenic (Dissolved)	ug/L	5	--	--	--	--
Cadmium (Dissolved)	ug/L	8.8	--	--	--	--
Copper (Dissolved)	ug/L	3.1	1.0 U	1.0 U	1.0 U	1.0 U
Nickel (Dissolved)	ug/L	8.2	--	--	--	--
Zinc (Dissolved)	ug/L	81	--	--	--	--

Table 1. Groundwater Chemistry Data for Acid Plant Subarea

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Outside of Acidic Metals Plume																
			AA-MW03			AA-MW03R													
			09/29/09	03/30/10	02/25/15	10/15/16	01/11/17	04/17/17	07/05/17	01/24/18	04/24/18	07/10/18	10/03/18	01/13/19	04/08/19	07/24/19	10/10/19	04/21/20	10/07/20
Field Parameters																			
pH	pH units	6.2	5.06	4.87	5.52	4.42	4.61	5.27	4.23	4.84	4.4	4.63	4.43	5.67	5.72	5.64	5.47	5.80	5.76
Temperature	deg C		15.94	11.26	12.2	16.55	10.54	11.9	16.95	11.2	11	16	16.9	12.9	11.5	17.4	17.5	12.2	18.1
Specific Conductance	uS/cm		1581	1661	1960	1820.5	1667.8	1820	1600.8	1431	1247	1288	1350	1153	901	976	706	813	805
Dissolved Oxygen	mg/L		0.86	0.92	0.99	0.1	0.51	1.55	0.11	0.9	0.2	0.1	0.12	0.08	0.2	0.35	0.14	0.75	0.45
ORP	mV		-268	69.9	119.3	-141.2	-10.5	-33.2	12	-25	-21	-49	39.4	-155	-77.2	-79.5	-4.4	-137	-30
Turbidity	NTU		10	10	2.55	7.12	--	--	9.34	--	4	4	0.02	8.54	11.8	11.2	2.41	1.9	0.02
Metals																			
Arsenic (Dissolved)	ug/L	5	0.87	0.5 U	3 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U
Cadmium (Dissolved)	ug/L	8.8	0.02 U	0.09	4 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U
Copper (Dissolved)	ug/L	3.1	0.99	1.09	1 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Nickel (Dissolved)	ug/L	8.2	3.01	7.37	8.0	4.3	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	65	33	27	45	12	6.4
Zinc (Dissolved)	ug/L	81	32.3	23.6	25 U	25 U	25 U	10 U	25 U	25 U	25.0 U	25 U	25 U	25 U	25 U	25 U	25 U	25 U	25 U

Analyte	Units	Groundwater Cleanup Level	Wells Outside of Acidic Metals Plume			
			AA-MW03R (continued)			
			04/28/21	10/20/21	04/27/22	10/26/22
Field Parameters						
pH	pH units	6.2	6.06	6.35	6.10	5.55
Temperature	deg C		12.6	17.7	12.2	17.6
Specific Conductance	uS/cm		1126	399.6	992	523
Dissolved Oxygen	mg/L		0.06	0.93	--	0.18
ORP	mV		-39	-149.5	-267	-168
Turbidity	NTU		2.9	0.02	2	8
Metals						
Arsenic (Dissolved)	ug/L	5	3.0 U	--	3.0 U	3.0 U
Cadmium (Dissolved)	ug/L	8.8	4.0 U	--	4.0 U	4.0 U
Copper (Dissolved)	ug/L	3.1	1.0 U	--	2.4	1.0 U
Nickel (Dissolved)	ug/L	8.2	4.0 U	--	4.0 U	4.0 U
Zinc (Dissolved)	ug/L	81	25 U	--	25 U	25 U

Table 1. Groundwater Chemistry Data for Acid Plant Subarea

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Outside of Acidic Metals Plume																		
			BC-MW05																		
			12/19/10	10/15/16	04/17/17	07/06/17	01/24/18	04/25/18	07/10/18	10/02/18	01/13/19	04/08/19	07/23/19	10/09/19	04/21/20	10/07/20	04/28/21	10/20/21			
Field Parameters																					
pH	pH units	6.2	7.64	7.25	7.4	7.2	7.2	7.42	7.21	7.26	7.54	7.25	7.17	7.12	7.22	Not Monitored					
Temperature	deg C		10.82	15.04	12.2	16.78	11.5	12.4	15	16	11.37	11.2	17.2	14.9	11.4						
Specific Conductance	uS/cm		25250	9868.8	4674	11489.4	5766	10857	13952	31689	15228	10350	11949	13024	13070						
Dissolved Oxygen	mg/L		0.22	0.12	0.2	0.16	0.3	0.1	1.9	0.53	0.18	0.23	0.33	0.27	6.77						
ORP	mV		-313.1	-326.5	-297.7	-327.8	-325	-207	-161	-294	-305.09	-290	-266.9	-187.4	-309						
Turbidity	NTU		2.75	13.7	--	7.72	--	--	--	0.02	80	8.19	7.8	0.87	0.4	Not Monitored					
Metals																					
Arsenic (Dissolved)	ug/L	5	--	--	--	--	--	--	--	--	--	--	--	--	--				Not Monitored		
Cadmium (Dissolved)	ug/L	8.8	--	--	--	--	--	--	--	--	--	--	--	--	--						
Copper (Dissolved)	ug/L	3.1	--	--	--	--	--	--	--	--	--	--	--	--	--						
Nickel (Dissolved)	ug/L	8.2	--	--	--	--	--	--	--	--	--	--	--	--	--						
Zinc (Dissolved)	ug/L	81	--	--	--	--	--	--	--	--	--	--	--	--	--						

Analyte	Units	Groundwater Cleanup Level	Wells Outside of Acidic Metals Plume	
			BC-MW05 (cont'd)	
			04/27/22	10/26/22
Field Parameters				
pH	pH units	6.2	Not Monitored	
Temperature	deg C			
Specific Conductance	uS/cm			
Dissolved Oxygen	mg/L			
ORP	mV			
Turbidity	NTU			
Metals				
Arsenic (Dissolved)	ug/L	5	Not Monitored	
Cadmium (Dissolved)	ug/L	8.8		
Copper (Dissolved)	ug/L	3.1		
Nickel (Dissolved)	ug/L	8.2		
Zinc (Dissolved)	ug/L	81		

Table 1. Groundwater Chemistry Data for Acid Plant Subarea

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Outside of Acidic Metals Plume															
			GF-MW01R															
			10/15/16	01/11/17	04/19/17	07/06/17	01/24/18	04/25/18	07/10/18	10/02/18	01/13/19	04/08/19	07/23/19	10/09/19	04/22/20	10/07/20	04/28/21	10/20/21
Field Parameters																		
pH	pH units	6.2	6.13	6.44	6.4	6.23	6.26	6.25	6.23	6.52	6.91	6.34	6.24	6.5	6.13	Not Monitored		
Temperature	deg C		16.95	10.73	12	16.42	12	13.4	15.8	17.6	12.99	11.3	17.2	17.1	11.9			
Specific Conductance	uS/cm		7059.1	7950.7	3687	1125.2	8380	1231	1764	19073	3445.7	4901	3204	2012	1464			
Dissolved Oxygen	mg/L		0.1	0.15	0.19	0.17	0.5	0.2	0.1	0.08	0.09	0.21	0.19	0.17	1.18			
ORP	mV		-219.6	-168.4	-127.7	-14.9	-90	-61	-95	-277.6	-254.3	-127	-61.3	-67.7	8.5			
Turbidity	NTU		6.47	9.7	--	7.72	--	--	5	0.02	3.17	--	8.1	3.99	1.9			
Metals																		
Arsenic (Dissolved)	ug/L	5	3.0 U	--	--	--	--	--	--	--	--	--	--	--	3.0 U	Not Monitored		
Cadmium (Dissolved)	ug/L	8.8	4.0 U	--	--	--	--	--	--	--	--	--	--	--	4.0 U			
Copper (Dissolved)	ug/L	3.1	1.0 U	--	1.0 U	--	--	--	--	--	--	--	--	--	1.0 U			
Nickel (Dissolved)	ug/L	8.2	4.0 U	--	4.0 U	--	--	--	--	--	--	--	--	--	4.0 U			
Zinc (Dissolved)	ug/L	81	25 U	--	--	--	--	--	--	--	--	--	--	--	25 U			

Analyte	Units	Groundwater Cleanup Level	Wells Outside of Acidic Metals Plume	
			GF-MW01R (cont'd)	
			04/27/22	10/26/22
Field Parameters				
pH	pH units	6.2	Not Monitored	
Temperature	deg C			
Specific Conductance	uS/cm			
Dissolved Oxygen	mg/L			
ORP	mV			
Turbidity	NTU			
Metals				
Arsenic (Dissolved)	ug/L	5	Not Monitored	
Cadmium (Dissolved)	ug/L	8.8		
Copper (Dissolved)	ug/L	3.1		
Nickel (Dissolved)	ug/L	8.2		
Zinc (Dissolved)	ug/L	81		

Notes

Wells AA-MW01R, BC-MW05, FH-MW01R, and GF-MW01R not monitored because they were within the Harcourt construction zone.

U - Not detected at PQL. Yellow - exceeded cleanup level. "--" indicates analysis not conducted.

deg C - degrees Celsius, ug/L - micrograms per liter, uS/cm -microsiemens per centimeter, mg/L - miligrams per liter, mV - millivolts, NTU - Nephelometric Turbidity Unit

Table 2. Groundwater Chemistry Data for Miscellaneous Metals Area

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Within Miscellaneous Metals Area											
			LP-MW01											
			07/27/04	09/30/09	03/29/10	02/26/15	10/14/16	01/11/17	04/17/17	07/06/17	01/23/18	04/23/18	07/10/18	10/03/18
Field Parameters														
pH	pH units	6.2	7.20	7.09	7.79	6.94	6.71	7.04	7.23	6.88	6.85	6.56	6.50	6.59
Temperature	deg C		19.14	19.1	11.39	10.8	16.11	7.6	11.2	18.79	9.1	11.7	18	16.9
Specific Conductance	uS/cm		863	712	222	193.3	277.5	237.2	509.8	430.2	317	164	590	670
Dissolved Oxygen	mg/L		0.73	0.99	3.14	0.60	7.46	1.79	0.21	0.16	0.4	1.2	0.1	3.21
ORP	mV		-27	-289	98	-179	77	30	-96	-193	121	-50	-111	77
Turbidity	NTU		17	10	10	4	3	1	--	5	10	9	7	0.02
Metals														
Arsenic (Dissolved)	ug/L	5	14.1	3.18	1.1 J	--	--	--	--	--	--	--	--	--
Cadmium (Dissolved)	ug/L	8.8	1.5	0.097	0.061	--	--	--	--	--	--	--	--	--
Copper (Dissolved)	ug/L	3.1	45	3.10	4.41	3.5	4.1	4.5	11	11	6.5	4.4	10	9.1
Nickel (Dissolved)	ug/L	8.2	7	1.61	1.2	4 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	--	4.1	--
Zinc (Dissolved)	ug/L	81	10	0.56	0.5 U	--	--	--	--	--	--	--	--	--

Analyte	Units	Groundwater Cleanup Level	Wells Within Miscellaneous Metals Area									
			LP-MW01 (continued)									
			01/14/19	04/09/19	07/24/19	10/08/19	04/20/20	10/07/20	04/29/21	10/21/21	04/28/22	10/26/22
Field Parameters												
pH	pH units	6.2	7.13	6.26	6.47	6.40	6.09	6.59	6.57	6.35	6.63	6.56
Temperature	deg C		10.39	11.1	17.6	14.9	12.3	16.7	12.8	14.9	11.2	16.2
Specific Conductance	uS/cm		166	265	563.6	273.4	190	385	243	284.5	239.8	1618
Dissolved Oxygen	mg/L		2.5	0.92	0.22	0.23	0.64	0.38	0.13	1.01	--	2.25
ORP	mV		-3	84	86	15	-121	140	60	-48	-241	-18
Turbidity	NTU		5	0.1	7	2	1	1	6	0.02	1	12
Metals												
Arsenic (Dissolved)	ug/L	5	--	--	--	--	--	--	--	--	--	--
Cadmium (Dissolved)	ug/L	8.8	--	--	--	--	--	--	--	--	--	--
Copper (Dissolved)	ug/L	3.1	3.9	4.2	7.4	9.1	3.1	8.8	2.1	9.4	4.0	25
Nickel (Dissolved)	ug/L	8.2	--	--	--	--	--	--	--	--	--	--
Zinc (Dissolved)	ug/L	81	--	--	--	--	--	--	--	--	--	--

Table 2. Groundwater Chemistry Data for Miscellaneous Metals Area

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Within Miscellaneous Metals Area										
			SC-MW02				SC-MW02R						
			07/27/04	09/30/09	04/01/10	02/26/15	10/14/16	04/17/17	07/05/17	01/23/18	04/23/18	07/10/18	10/02/18
Field Parameters													
pH	pH units	6.2	6.05	6.41	6.56	6.78	6.89	6.94	6.34	6.7	6.69	6.51	6.71
Temperature	deg C		15.28	16.58	10.89	11.3	16.51	11.6	17.38	11.1	11.1	16.1	15.3
Specific Conductance	uS/cm		6685	4137	2920	3325	1765.5	1726	1855.5	1389	1024	2557	4233
Dissolved Oxygen	mg/L		0.68	0.65	4.58	0.58	0.12	0.1	0.1	0.6	--	0.1	0.06
ORP	mV		-385	-497	-272	-194	-303	-178	-269	-62	-92	-215	230
Turbidity	NTU		56	10	15	9	28	--	--	--	12	38	0
Metals													
Arsenic (Dissolved)	ug/L	5	12.2	2.94	1.67 U	--	--	--	--	--	--	--	--
Cadmium (Dissolved)	ug/L	8.8	0.5 U	0.043	0.067 U	--	--	--	--	--	--	--	--
Copper (Dissolved)	ug/L	3.1	17	4.78	0.412	2 U	4.4	3.1	4.1	3.7	4.1	16	7.3
Nickel (Dissolved)	ug/L	8.2	29	8.42	1.67 U	13	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	17	28
Zinc (Dissolved)	ug/L	81	20	4.13	1.67 U	--	--	--	--	--	--	--	--

Analyte	Units	Groundwater Cleanup Level	Wells Within Miscellaneous Metals Area									
			SC-MW02R (continued)									
			01/14/19	04/09/19	07/24/19	10/08/19	04/20/20	10/07/20	04/29/21	10/21/21	04/28/22	10/26/22
Field Parameters												
pH	pH units	6.2	7.12	6.37	6.55	6.56	6.33	6.73	6.87	6.55	7.03	6.92
Temperature	deg C		9.53	10.3	15.7	14.6	12.1	16.0	12.2	15.9	11.4	15.2
Specific Conductance	uS/cm		1187	1587	2267	1053	1577	2799	2083	1067	1564	3771
Dissolved Oxygen	mg/L		0.15	0.79	0.11	0.47	0.47	0.16	0.16	0.11	0.17	-324
ORP	mV		-216	-116	-341	-44	-154	-300	-286	-209		-353
Turbidity	NTU		18	42	38	8	70	9	17	6	11	13
Metals												
Arsenic (Dissolved)	ug/L	5	--	--	--	--	--	--	--	--	--	--
Cadmium (Dissolved)	ug/L	8.8	--	--	--	--	--	--	--	--	--	--
Copper (Dissolved)	ug/L	3.1	14	4.8	7.4	5.1	2.9	3.3	2.8	2.4	2.5	6.6
Nickel (Dissolved)	ug/L	8.2	4.0 U	4.0 U	6.2	4.0 U	--	--	--	--	--	--
Zinc (Dissolved)	ug/L	81	--	--	--	--	--	--	--	--	--	--

Table 2. Groundwater Chemistry Data for Miscellaneous Metals Area

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Downgradient of Miscellaneous Metals Area									
			AA-MW02			AA-MW02R						
			10/01/09	04/01/10	02/25/15	10/14/16	04/17/17	07/05/17	01/24/18	04/24/18	07/10/18	10/03/18
Field Parameters												
pH	pH units	6.2	7.23	7.24	7.32	7.35	7.41	7.19	7.18	7.33	7.1	7.2
Temperature	deg C		15.13	12.39	12.4	16.46	12.4	16.16	12.3	11.4	14.9	15.1
Specific Conductance	uS/cm		1337	984	1110	1204.2	1018	883.6	957	807	812	753
Dissolved Oxygen	mg/L		0.58	0.72	0.54	0.09	0.25	0.23	0.3	0.1	0.1	0.2
ORP	mV		-335	-239	0	-183	-42	-28	59	1	-11	-30
Turbidity	NTU		10	10	16	9	--	13	--	5	7	0.02
Metals												
Arsenic (Dissolved)	ug/L	5	0.1 J	0.5 U	3 U	--	3.0 U	3.0 U	--	--	--	--
Cadmium (Dissolved)	ug/L	8.8	0.02 U	0.02 U	4 U	--	4.0 U	4.0 U	--	--	--	--
Copper (Dissolved)	ug/L	3.1	0.67	0.68	1 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Nickel (Dissolved)	ug/L	8.2	2.18	2.3	4 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U
Zinc (Dissolved)	ug/L	81	0.4 J	0.6 J	25 U	--	10 U	25 U	--	--	--	--

Analyte	Units	Groundwater Cleanup Level	Wells Downgradient of Miscellaneous Metals Area									
			AA-MW02R (continued)									
			01/13/19	04/08/19	07/24/19	10/09/19	04/22/20	10/07/20	04/28/21	10/20/21	04/28/22	10/26/22
Field Parameters												
pH	pH units	6.2	7.56	7.24	7.21	7.25	7.25	7.27	7.50	7.24	7.40	7.29
Temperature	deg C		12.85	12	16.1	14.8	11.7	15.6	12.3	15.7	11.9	15.3
Specific Conductance	uS/cm		925.5	1041	1055	886	806	780	696	591.1	661	746
Dissolved Oxygen	mg/L		0.12	0.21	0.37	0.18	0.63	0.14	0.45	0.10	--	0.38
ORP	mV		-133	-10	-43	26	13	-228	68	91	-288	-191
Turbidity	NTU		8	1	8	1	1	0.02	3	0.02	2	6
Metals												
Arsenic (Dissolved)	ug/L	5	--	--	--	--	--	--	--	--	--	--
Cadmium (Dissolved)	ug/L	8.8	--	--	--	--	--	--	--	--	--	--
Copper (Dissolved)	ug/L	3.1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Nickel (Dissolved)	ug/L	8.2	4.0 U	4.0 U	4.0 U	4.0 U	--	--	--	--	--	--
Zinc (Dissolved)	ug/L	81	--	--	--	--	--	--	--	--	--	--

Table 2. Groundwater Chemistry Data for Miscellaneous Metals Area

Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Analyte	Units	Groundwater Cleanup Level	Wells Downgradient of Miscellaneous Metals Area											
			LB-MW01				LB-MW01R							
			07/27/04	10/01/09	04/01/10	02/26/15	10/14/16	01/11/17	04/19/17	07/05/17	01/24/18	04/23/18	07/10/18	10/02/18
Field Parameters														
pH	pH units	6.2	6.60	6.79	6.84	6.70	6.93	7	7.23	7.04	6.95	7.19	7.39	7.74
Temperature	deg C		20.00	18.3	11.38	11.3	16.09	10.93	11	16.33	10.7	12.3	15.1	15.3
Specific Conductance	uS/cm		858	1001	702	607	1008	723.3	540.1	478.9	589	376	1001	1489
Dissolved Oxygen	mg/L		0.86	0.61	0.95	0.53	0.15	0.22	0.15	0.06	0.3	0.1	0.1	0.01
ORP	mV		-295	-379	-251	57	-207	-44	-18	-51	47	-43	-33	-299
Turbidity	NTU		6	10	10	4	19	11	--	2	--	5	8	--
Metals														
Arsenic (Dissolved)	ug/L	5	0.5 U	0.5 U	0.5 U	3 U	--	--	--	--	--	--	--	--
Cadmium (Dissolved)	ug/L	8.8	0.5 U	0.02 U	0.02 U	4 U	--	--	--	--	--	--	--	--
Copper (Dissolved)	ug/L	3.1	1 U	1.4	0.79	8.7	5.9	2.0	2.0	11.0	6.7	6.0	5.4	4.1
Nickel (Dissolved)	ug/L	8.2	1 U	0.86	2	4 U	4.0 U	4.0 U	4.0 U	4.0 U	4.0 U	4 U	4.0 U	4.0 U
Zinc (Dissolved)	ug/L	81	10 U	0.72	0.6 J	25 U	--	--	--	--	--	--	--	--

Analyte	Units	Groundwater Cleanup Level	Wells Downgradient of Miscellaneous Metals Area									
			LB-MW01R (continued)									
			01/13/19	04/09/19	07/24/19	10/09/19	04/21/20	10/07/20	04/28/21	10/20/21	04/28/22	10/26/22
Field Parameters												
pH	pH units	6.2	7.45	7.64	7.62	7.45	7.44	7.66	8.24	7.10	7.75	8.39
Temperature	deg C		11.1	10.8	15	14.7	11.4	15.5	12.3	15.4	11.3	14.8
Specific Conductance	uS/cm		634.9	1364	1361	1197	626	1122	995	760	471.5	905
Dissolved Oxygen	mg/L		0.13	0.22	0.08	0.12	1.17	0.18	0.11	1.96		0.11
ORP	mV		-170	-146	-66	-18	-188	-95	-273	-146	-147	-250
Turbidity	NTU		2	0.1	9	2	3	2	3	0.02	2	7
Metals												
Arsenic (Dissolved)	ug/L	5	--	--	--	--	--	--	--	--	--	--
Cadmium (Dissolved)	ug/L	8.8	--	--	--	--	--	--	--	--	--	--
Copper (Dissolved)	ug/L	3.1	3.4	5.7	7.1	3.7	5.5	5.6	7.4	1.7	1.9	5.2
Nickel (Dissolved)	ug/L	8.2	4.0 U	4.0 U	4.0 U	4.0 U	--	--	--	--	--	--
Zinc (Dissolved)	ug/L	81	--	--	--	--	--	--	--	--	--	--

Notes

Wells AA-MW02R and SC-MW02R not monitored 1/11/17 due to iced-in monuments.

U - Not detected at PQL. Yellow - exceeded cleanup level. "--" indicates analysis not conducted.

deg C - degrees Celsius, ug/L - micrograms per liter, uS/cm -microsiemens per centimeter, mg/L - miligrams per liter, mV - millivolts, NTU - Nephelometric Turbidity Unit

Table 3. Wells and Analytes for 2023 Groundwater Monitoring

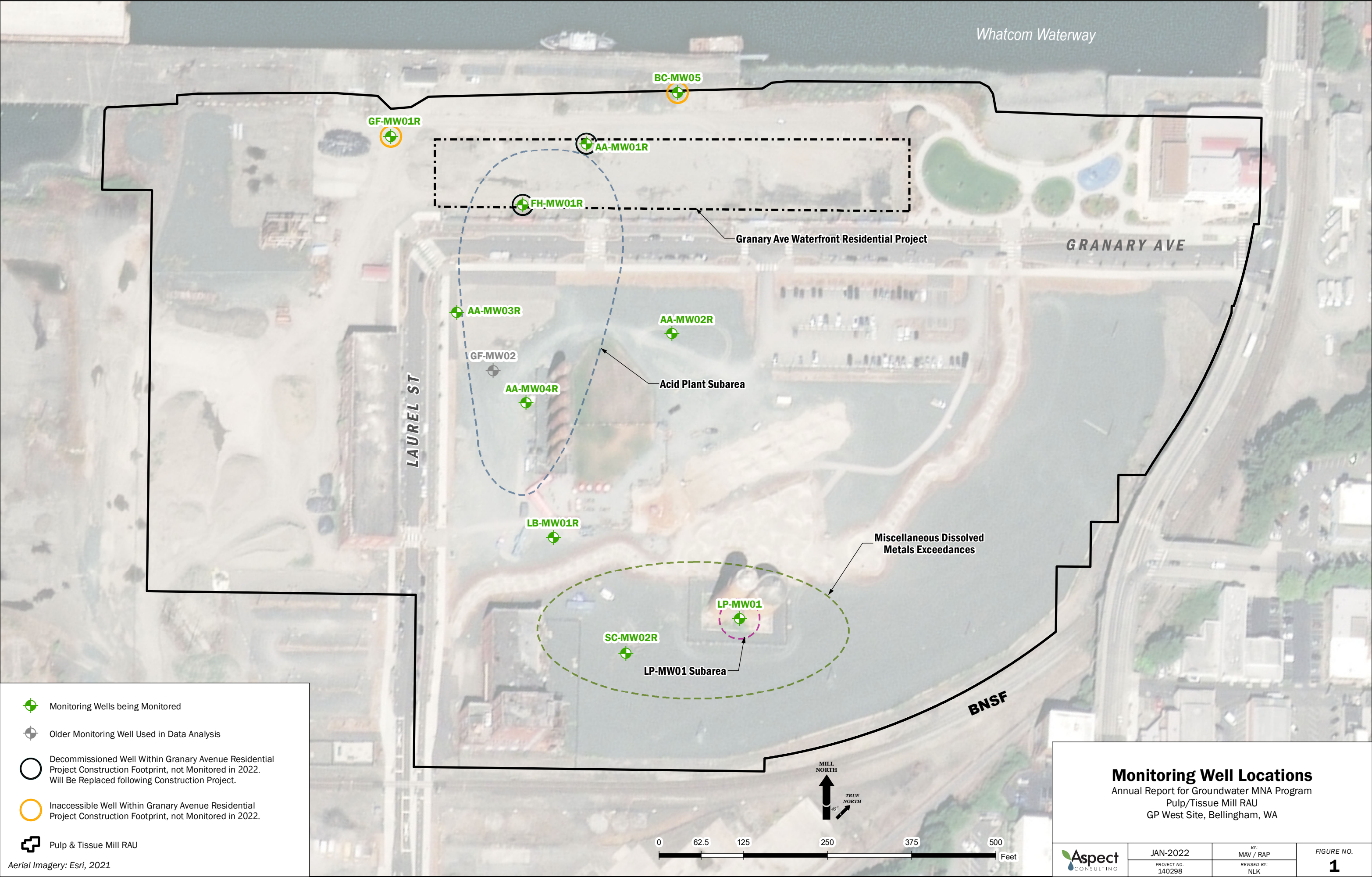
Project No. 140298-A, Georgia-Pacific West Site, Bellingham, Washington

Well ID	Field Parameters	Dissolved Metals				
		Arsenic	Cadmium	Copper	Nickel	Zinc
AA-MW01R	X	X	X	X	X	X
AA-MW04R	X	X	X	X	X	X
FH-MW01R	X	X	X	X	X	X
LB-MW01R	X			X		
LP-MW01	X			X		
SC-MW02R	X			X		
AA-MW02R	X	X if pH <6.2	X if pH <6.2	X	X if pH <6.2	X if pH <6.2
AA-MW03R	X	X for As, Cd, Cu, Ni, Zn if pH <6.2				
BC-MW05	X					
GF-MW01R	X					

Notes

If pH < 6.2 in AA-MW02R, AA-MW03R, BC-MW05R, or GF-MW01R, analyze that well for full suite of dissolved metals (As, Cd, Cu, Ni, Zn). However, AA-MW02R is analyzed for Cu and Ni each event regardless of pH (refer to text).

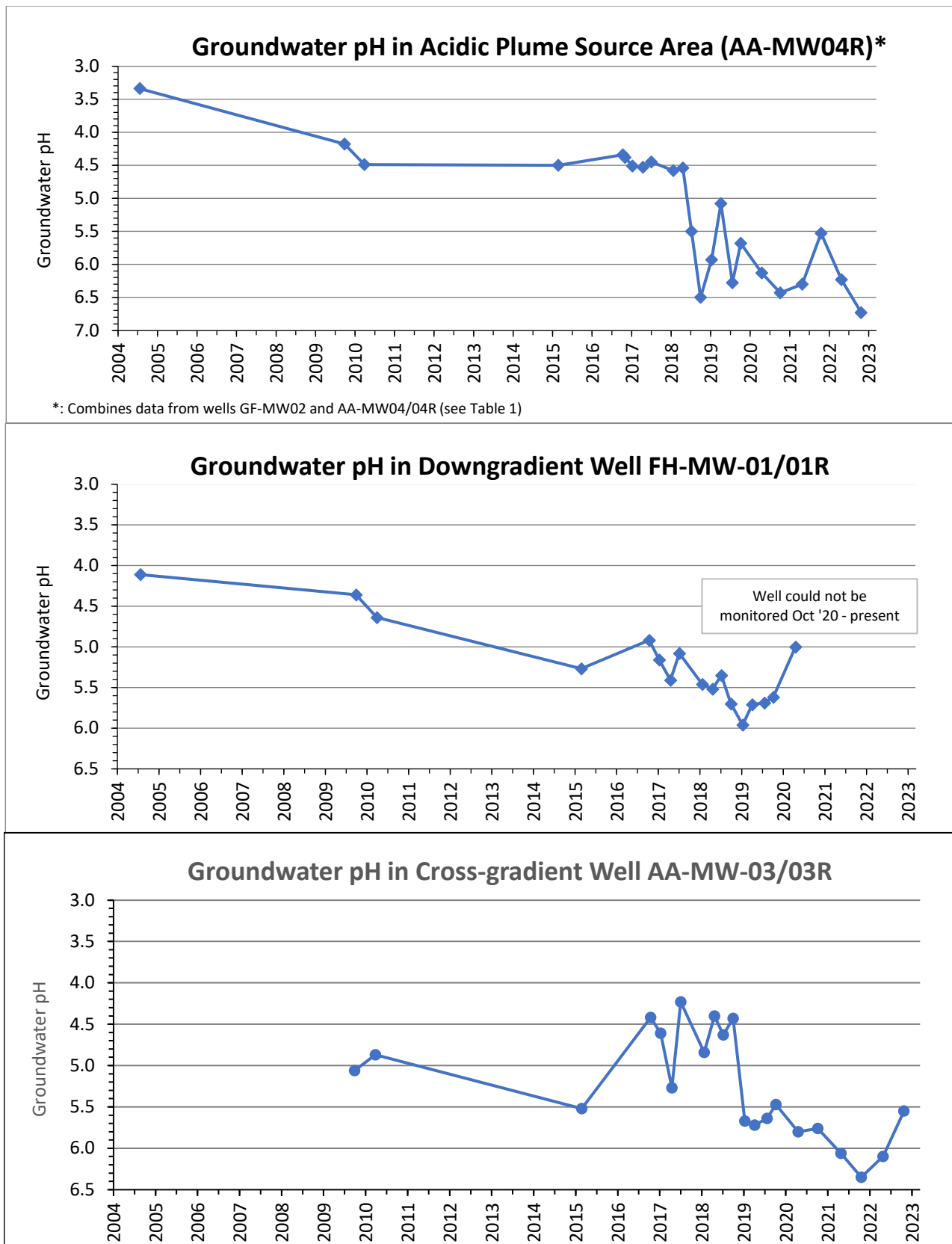
FIGURES



Aerial Imagery: Esri, 2021

Basemap Layer Credits || Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Path: G:\projects\Port_of_Bellingham\Delivered\Monitoring\Plan\GW\Natural\Attenuation\Annual Report for GWMNA Program\01 MW Locations.mxd



Note: Groundwater pH axis is plotted in reverse order so higher on axis is farther from pH 6.2 CUL.

Figure 2
Acidic Plume Groundwater pH Trends Over Time, 2004-2022

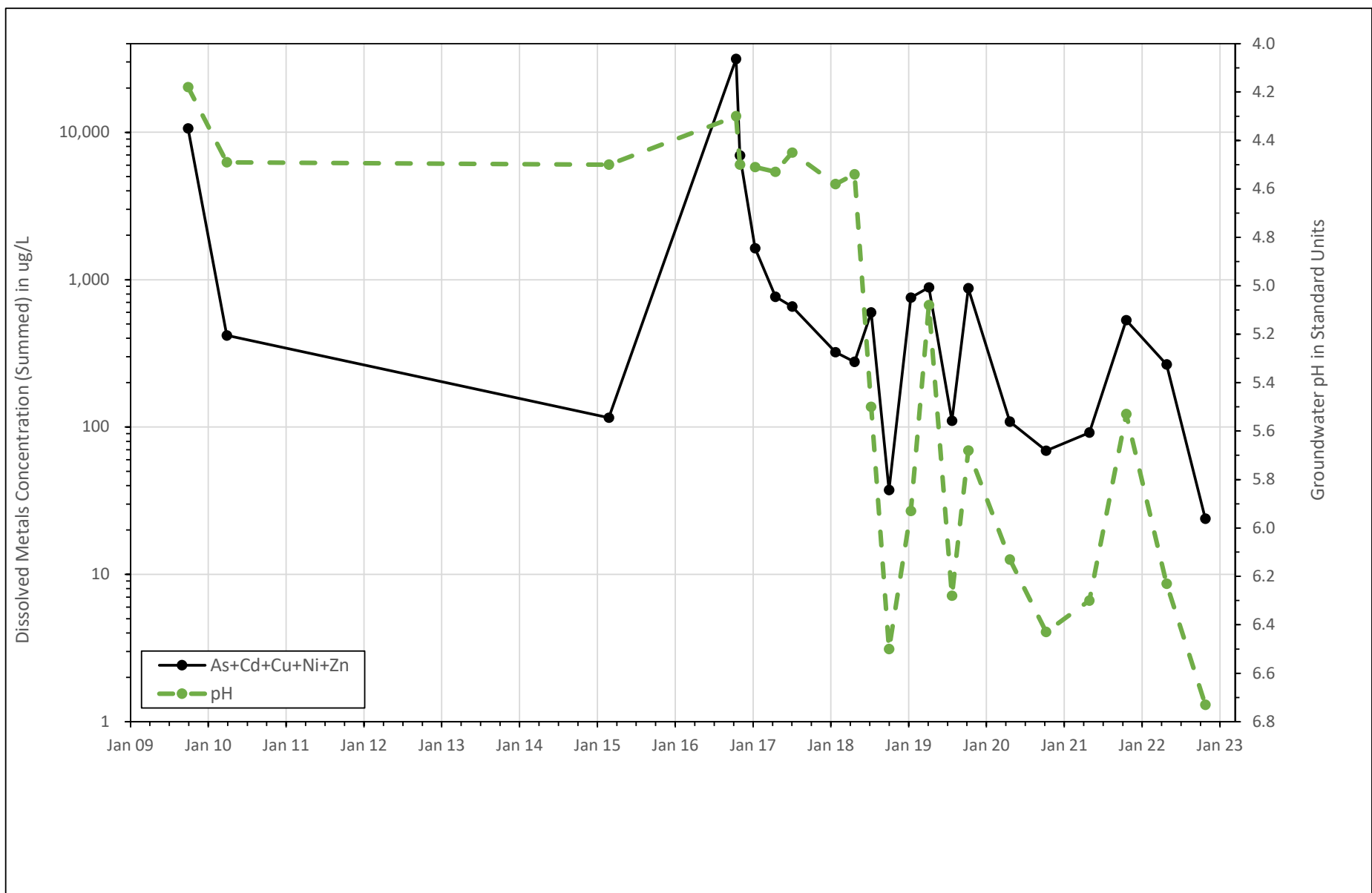


Figure 3
Concentration Trends Over Time for Wells AA-MW04/04R

APPENDIX A

Data Validation Report and Laboratory Reports from OnSite Environmental

DATA VALIDATION REPORT
Pulp/Tissue Mill RAU of GP West Site
2022 Groundwater Sampling
November 2022
Sample Delivery Groups 2204-340, 2210-322

Prepared by:
Aspect Consulting, LLC
710 2nd Ave, Suite 550
Seattle, WA 98104

1 Introduction

This report summarizes the findings of a U.S. Environmental Protection Agency (USEPA) Stage 2A data validation performed on analytical data groundwater samples collected in November 2022 for the GP West Pulp and Tissue Mill Remedial Action Unit groundwater monitoring program.

Samples were analyzed for select metals by EPA method 200.8 by Onsite Environmental, Inc. in Redmond, Washington (Onsite). Refer to the table below for further information.

Table 1. Analytical Methods

Analysis	Method	Laboratory
Metals (arsenic [As], copper [Cu], Cadmium [Cd], nickel [Ni], zinc [Zn])	EPA 200.8	OnSite

The validation followed the procedures documented in the analytical methods, and the *National Functional Guidelines for Organic Data Review* (USEPA, 2017), and *Contract Laboratory Program SOW* (USEPA, 2016).

Data assigned a J qualifier (estimated) may be used for site evaluation purposes but the reasons for qualification should be considered when interpreting sample concentrations. Data marked as rejected (R) should not be used under any circumstances. Values without qualification meet all data measurement quality objectives and are suitable for use.

No data were qualified in the course of this review; all quality control (QC) requirements were met.

2 Data Validation Findings for Sample Delivery Group 2204-340

Water samples in this sample delivery group (SDG), and the chemical analyses performed on them, are tabulated below. The sections below describe the results of the data quality review.

Table 2. Sample Index

Sample Name	Sample Date	Sample Matrix	Metals (As, Cu, Cd, Ni, Zn)
LPMW01-20220428	2022-04-28 15:30:00	Water	x
AAMW04R-20220427	2022-04-27 13:40:00	Water	x
AAMW02R-20220427	2022-04-27 16:25:00	Water	x
SCMW02R-20220428	2022-04-28 14:23:00	Water	x
AAMW03R-20220428	2022-04-28 12:27:00	Water	x
LBMW01R-20220428	2022-04-28 11:29:00	Water	x

2.1 Metals (EPA 200.8)

2.1.1 Sample Receipt, Preservation, and Holding Times

Sample receipt and preservation (2-6 degrees C) were acceptable. Samples were analyzed within the requisite holding time limit.

2.1.2 Method Blanks / Detection Levels

Target analytes were not detected at or above the reporting levels in the method blank. No qualification or action was needed.

2.1.3 Laboratory Control Samples

All laboratory control sample (LCS) percent recoveries (%R) were within the laboratory specified control limits for requested analytes. No qualification or action was needed.

2.1.4 Laboratory Duplicate Sample

All laboratory duplicate sample relative percent differences (RPDs) were within the laboratory specified control limits for all target analytes. No qualification or action was needed.

2.1.5 Matrix Spike / Matrix Spike Duplicates

All matrix spike (MS) and MS duplicate sample %Rs and RPDs were within the laboratory specified control limits for all target analytes. No qualification or actions were needed.

2.1.6 Overall Assessment

Accuracy was acceptable based on the LCS and MS/MSD %Rs and precision was acceptable based on the laboratory duplicate and MS/MSD RPD values. The data are of known quality and are acceptable for use.

3 Data Validation Findings for Sample Delivery Group 2210-322

Water samples in this sample delivery group (SDG), and the chemical analyses performed on them, are tabulated below. The sections below describe the results of the data quality review.

Table 3. Sample Index

Sample Name	Sample Date	Sample Matrix	Metals (As, Cu, Cd, Ni, Zn)
AA-MW03R-2022-10-26	2022-10-26 11:04:00	Water	x
AA-MW02R-2022-10-26	2022-10-26 12:17:00	Water	x
AA-MW04R-2022-10-26	2022-10-26 09:15:00	Water	x
SC-MW02R-2022-10-25	2022-10-26 10:15:00	Water	x
LP-MW01-2022-10-25	2022-10-26 11:45:00	Water	x
LB-MW01R-2022-10-25	2022-10-26 14:51:00	Water	x

3.1 Metals (EPA 200.8)

3.1.1 Sample Receipt, Preservation, and Holding Times

Sample receipt and preservation (2-6 degrees C) were acceptable. Samples were analyzed within the requisite holding time limit.

3.1.2 Method Blanks / Detection Levels

Target analytes were not detected at or above the reporting levels in the method blank. No qualification or action was needed.

3.1.3 Laboratory Control Samples

All laboratory control sample (LCS) percent recoveries (%R) were within the laboratory specified control limits for requested analytes. No qualification or action was needed.

3.1.4 Laboratory Duplicate Sample

All laboratory duplicate sample relative percent differences (RPDs) were within the laboratory specified control limits for all target analytes. No qualification or action was needed.

3.1.5 Matrix Spike / Matrix Spike Duplicates

All matrix spike (MS) and MS duplicate sample %Rs and RPDs were within the laboratory specified control limits for all target analytes. No qualification or actions were needed.

3.1.6 Overall Assessment

Accuracy was acceptable based on the LCS and MS/MSD %Rs and precision was acceptable based on the laboratory duplicate and MS/MSD RPD values. The data are of known quality and are acceptable for use.

4 Qualified Data Summary

No sample results were qualified in the course of the Stage 2A validation performed.

5 Data Qualifier Definitions

Data Qualifier	Definition
J	The analyte was detected above the reported quantitation limit, and the reported concentration was an estimated value.
R	The sample results are unusable due to the quality of the data generated because certain criteria were not met. The analyte may or may not be present in the sample.
U	The analyte was analyzed for but was considered not detected at the reporting limit or reported value.
UJ	The analyte was analyzed for, and the associated quantitation limit was an estimated value.

6 References

- U.S. Environmental Protection Agency (USEPA), 2017 National Functional Guidelines for Organic Methods Data Review, Office of Superfund Remediation and Technology Innovation (OSRTI), USEPA Publication No. 540-R-2017-002, January.
- U.S. Environmental Protection Agency (USEPA), 2016, Contract Laboratory Program (CLP) Statement of Work (SOW) for Organic Superfund Methods, Multi-Media, Multi-Concentration, SOM02.4, October.



14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

May 9, 2022

Steve Germiot
Aspect Consulting
Dexter Horton Building
710 2nd Avenue, Suite 550
Seattle, WA 98104

Re: Analytical Data for Project 140298
Laboratory Reference No. 2204-340

Dear Steve:

Enclosed are the analytical results and associated quality control data for samples submitted on April 29, 2022.

The standard policy of OnSite Environmental, Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "DB", with a long horizontal stroke extending to the right.

David Baumeister
Project Manager

Enclosures



OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3881

This report pertains to the samples analyzed in accordance with the chain of custody, and is intended only for the use of the individual or company to whom it is addressed.

Date of Report: May 9, 2022
Samples Submitted: April 29, 2022
Laboratory Reference: 2204-340
Project: 140298

Case Narrative

Samples were collected on April 27 and 28, 2022 and received by the laboratory on April 29, 2022. They were maintained at the laboratory at a temperature of 2°C to 6°C.

Please note that any and all soil sample results are reported on a dry-weight basis, unless otherwise noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.



Date of Report: May 9, 2022
 Samples Submitted: April 29, 2022
 Laboratory Reference: 2204-340
 Project: 140298

DISSOLVED METALS
EPA 200.8

Matrix: Water
 Units: ug/L (ppb)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	LPMW01-20220428					
Laboratory ID:	04-340-01					
Copper	4.0	1.0	EPA 200.8		5-6-22	

Client ID:	AAMW04R-20220427					
Laboratory ID:	04-340-02					
Arsenic	5.0	3.0	EPA 200.8		5-6-22	
Cadmium	23	4.0	EPA 200.8		5-6-22	
Copper	110	1.0	EPA 200.8		5-6-22	
Nickel	18	4.0	EPA 200.8		5-6-22	
Zinc	110	25	EPA 200.8		5-6-22	

Client ID:	AAMW02R-20220427					
Laboratory ID:	04-340-03					
Copper	ND	1.0	EPA 200.8		5-6-22	

Client ID:	SCMW02R-20220428					
Laboratory ID:	04-340-04					
Copper	2.5	1.0	EPA 200.8		5-6-22	

Client ID:	AAMW03R-20220428					
Laboratory ID:	04-340-05					
Arsenic	ND	3.0	EPA 200.8		5-6-22	
Cadmium	ND	4.0	EPA 200.8		5-6-22	
Copper	2.4	1.0	EPA 200.8		5-6-22	
Nickel	ND	4.0	EPA 200.8		5-6-22	
Zinc	ND	25	EPA 200.8		5-6-22	

Client ID:	LBMW01R-20220428					
Laboratory ID:	04-340-06					
Copper	1.9	1.0	EPA 200.8		5-6-22	



Date of Report: May 9, 2022
 Samples Submitted: April 29, 2022
 Laboratory Reference: 2204-340
 Project: 140298

**DISSOLVED METALS
 EPA 200.8
 QUALITY CONTROL**

Matrix: Water
 Units: ug/L (ppb)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB0506D1					
Arsenic	ND	3.0	EPA 200.8		5-6-22	
Cadmium	ND	4.0	EPA 200.8		5-6-22	
Copper	ND	1.0	EPA 200.8		5-6-22	
Nickel	ND	4.0	EPA 200.8		5-6-22	
Zinc	ND	25	EPA 200.8		5-6-22	

Analyte	Result	Spike Level	Source Result	Percent Recovery	Recovery Limits	RPD	RPD Limit	Flags
DUPLICATE								
Laboratory ID:	04-340-05							
	ORIG	DUP						
Arsenic	ND	ND	NA	NA	NA	NA	NA	20
Cadmium	ND	ND	NA	NA	NA	NA	NA	20
Copper	2.36	2.38	NA	NA	NA	NA	1	20
Nickel	ND	ND	NA	NA	NA	NA	NA	20
Zinc	ND	ND	NA	NA	NA	NA	NA	20

MATRIX SPIKES

Laboratory ID:	04-340-05									
	MS	MSD	MS	MSD		MS	MSD			
Arsenic	88.4	88.6	80.0	80.0	ND	111	111	75-125	0	20
Cadmium	80.0	81.2	80.0	80.0	ND	100	102	75-125	1	20
Copper	69.2	69.0	80.0	80.0	2.36	84	83	75-125	0	20
Nickel	76.0	76.0	80.0	80.0	ND	95	95	75-125	0	20
Zinc	80.6	80.0	80.0	80.0	ND	101	100	75-125	1	20

SPIKE BLANK

Laboratory ID:	SB0506D1									
Arsenic	77.4		80.0		N/A	97		85-115		
Cadmium	80.4		80.0		N/A	101		85-115		
Copper	75.2		80.0		N/A	94		85-115		
Nickel	75.4		80.0		N/A	94		85-115		
Zinc	77.2		80.0		N/A	97		85-115		





Data Qualifiers and Abbreviations

- A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.
- B - The analyte indicated was also found in the blank sample.
- C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.
- E - The value reported exceeds the quantitation range and is an estimate.
- F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.
- H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.
- I - Compound recovery is outside of the control limits.
- J - The value reported was below the practical quantitation limit. The value is an estimate.
- K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.
- L - The RPD is outside of the control limits.
- M - Hydrocarbons in the gasoline range are impacting the diesel range result.
- M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.
- N - Hydrocarbons in the lube oil range are impacting the diesel range result.
- N1 - Hydrocarbons in diesel range are impacting lube oil range results.
- O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.
- P - The RPD of the detected concentrations between the two columns is greater than 40.
- Q - Surrogate recovery is outside of the control limits.
- S - Surrogate recovery data is not available due to the necessary dilution of the sample.
- T - The sample chromatogram is not similar to a typical _____.
- U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
- U1 - The practical quantitation limit is elevated due to interferences present in the sample.
- V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.
- W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.
- X - Sample extract treated with a mercury cleanup procedure.
- X1 - Sample extract treated with a sulfuric acid/silica gel cleanup procedure.
- X2 - Sample extract treated with a silica gel cleanup procedure.
- Y - The calibration verification for this analyte exceeded the 20% drift specified in methods 8260 & 8270, and therefore the reported result should be considered an estimate. The overall performance of the calibration verification standard met the acceptance criteria of the method.
- Y1 - Negative effects of the matrix from this sample on the instrument caused values for this analyte in the bracketing continuing calibration verification standard (CCVs) to be outside of 20% acceptance criteria. Because of this, quantitation limits and sample concentrations should be considered estimates.
- Z -
- ND - Not Detected at PQL
- PQL - Practical Quantitation Limit
- RPD - Relative Percent Difference





**Onsite
Environmental Inc.**

Analytical Laboratory Testing Services
14648 NE 95th Street • Redmond, WA 98052
Phone: (425) 883-3881 • www.onsite-env.com

Chain of Custody

Company: <u>Aspect</u>		Turnaround Request (in working days)			Laboratory Number: 04-340															
Project Number: <u>140298</u>		<input type="checkbox"/> Same Day <input type="checkbox"/> 1 Day																		
Project Name: <u>GP PTM RAV MVA</u>		<input type="checkbox"/> 2 Days <input type="checkbox"/> 3 Days																		
Project Manager: <u>Steve Gerniat</u>		<input checked="" type="checkbox"/> Standard (7 Days)																		
Sampled by: <u>Aaron Fitts</u>		<input type="checkbox"/> (other) _____																		
Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	Number of Containers															
1	CPM01-20220426	4/28/22	15:30	GL	1	NWTPH-HCID														
2	AAW04R-20220427	4/27/22	13:40	GL	1	NWTPH-Gx/BTEX (8021 <input type="checkbox"/> 8260 <input type="checkbox"/>)														
3	AAW02R-20220427	4/27/22	16:25	GL	1	NWTPH-Gx														
4	SCMW02R-20220428	4/28/22	14:23	GL	1	NWTPH-Dx (Acid / SG Clean-up <input type="checkbox"/>)														
5	AAW03R-20220428	4/28/22	12:27	GL	1	Volatiles 8260														
6	LB MW01R-20220426	4/28/22	11:29	GL	1	Halogenated Volatiles 8260														
						EDB EPA 8011 (Waters Only)														
						Semivolatiles 8270/SIM (with low-level PAHs)														
						PAHs 8270/SIM (low-level)														
						PCBs 8082														
						Organochlorine Pesticides 8081														
						Organophosphorus Pesticides 8270/SIM														
						Chlorinated Acid Herbicides 8151														
						Total RCRA Metals														
						Total MTCA Metals														
						TCLP Metals														
						HEM (oil and grease) 1664														
						Cu Dis														
						As, Cd, Ni, Zn Dis.														
						% Moisture														
Signature:		Company: <u>Aspect</u>		Date: <u>4/28/22</u>		Time: <u>4:40 PM</u>		Comments/Special Instructions												
Relinquished		Received		Relinquished		Received		• All samples field filtered 0.45u												
Relinquished		Received		Relinquished		Received		• E.C. > 1,000 for samples AAW04R + SCMW02R												
Relinquished		Received		Relinquished		Received		Data Package: Standard <input type="checkbox"/> Level III <input type="checkbox"/> Level IV <input type="checkbox"/>												
Reviewed/Date		Reviewed/Date		Reviewed/Date		Reviewed/Date		Chromatograms with final report <input type="checkbox"/> Electronic Data Deliverables (EDDs) <input type="checkbox"/>												



14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

November 7, 2022

Steve Germiot
Aspect Consulting
Dexter Horton Building
710 2nd Avenue, Suite 550
Seattle, WA 98104

Re: Analytical Data for Project 140298
Laboratory Reference No. 2210-322

Dear Steve:

Enclosed are the analytical results and associated quality control data for samples submitted on October 27, 2022.

The standard policy of OnSite Environmental, Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read 'DB', with a long horizontal stroke extending to the right.

David Baumeister
Project Manager

Enclosures



OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3881

This report pertains to the samples analyzed in accordance with the chain of custody, and is intended only for the use of the individual or company to whom it is addressed.

Date of Report: November 7, 2022
Samples Submitted: October 27, 2022
Laboratory Reference: 2210-322
Project: 140298

Case Narrative

Samples were collected on October 25, 26, 2022 and received by the laboratory on October 27, 2022. They were maintained at the laboratory at a temperature of 2°C to 6°C.

Please note that any and all soil sample results are reported on a dry-weight basis, unless otherwise noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.



Date of Report: November 7, 2022
 Samples Submitted: October 27, 2022
 Laboratory Reference: 2210-322
 Project: 140298

DISSOLVED METALS
EPA 200.8

Matrix: Water
 Units: ug/L (ppb)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID: AA-MW03R-2022-10-26						
Laboratory ID: 10-322-01						
Arsenic	ND	3.0	EPA 200.8		11-2-22	
Cadmium	ND	4.0	EPA 200.8		11-2-22	
Copper	ND	1.0	EPA 200.8		11-2-22	
Nickel	ND	4.0	EPA 200.8		11-2-22	
Zinc	ND	25	EPA 200.8		11-2-22	

Client ID: AA-MW02R-2022-10-26

Laboratory ID: 10-322-02

Copper	ND	1.0	EPA 200.8		11-2-22	
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Client ID: AA-MW04R-2022-10-26

Laboratory ID: 10-322-03

Arsenic	4.4	3.0	EPA 200.8		11-2-22	
Cadmium	ND	4.0	EPA 200.8		11-2-22	
Copper	3.0	1.0	EPA 200.8		11-2-22	
Nickel	ND	4.0	EPA 200.8		11-2-22	
Zinc	ND	25	EPA 200.8		11-2-22	

Client ID: SC-MW02R-2022-10-25

Laboratory ID: 10-322-04

Copper	6.6	1.0	EPA 200.8		11-2-22	
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Client ID: LP-MW01-2022-10-25

Laboratory ID: 10-322-05

Copper	25	1.0	EPA 200.8		11-2-22	
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Client ID: LB-MW01R-2022-10-25

Laboratory ID: 10-322-06

Copper	5.2	1.0	EPA 200.8		11-2-22	
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Date of Report: November 7, 2022
 Samples Submitted: October 27, 2022
 Laboratory Reference: 2210-322
 Project: 140298

**DISSOLVED METALS
 EPA 200.8
 QUALITY CONTROL**

Matrix: Water
 Units: ug/L (ppb)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB1031F1					
Arsenic	ND	3.0	EPA 200.8	10-31-22	11-2-22	
Cadmium	ND	4.0	EPA 200.8	10-31-22	11-2-22	
Copper	ND	1.0	EPA 200.8	10-31-22	11-2-22	
Nickel	ND	4.0	EPA 200.8	10-31-22	11-2-22	
Zinc	ND	25	EPA 200.8	10-31-22	11-2-22	

Analyte	Result	Spike Level	Source Result	Percent Recovery	Recovery Limits	RPD	RPD Limit	Flags
DUPLICATE								
Laboratory ID:	10-354-01							
	ORIG	DUP						
Arsenic	ND	ND	NA	NA	NA	NA	NA	20
Cadmium	ND	ND	NA	NA	NA	NA	NA	20
Copper	7.60	7.42	NA	NA	NA	NA	2	20
Nickel	ND	ND	NA	NA	NA	NA	NA	20
Zinc	28.2	27.8	NA	NA	NA	NA	1	20

MATRIX SPIKES

Laboratory ID:	10-354-01									
	MS	MSD	MS	MSD		MS	MSD			
Arsenic	83.6	82.2	80.0	80.0	ND	105	103	75-125	2	20
Cadmium	80.6	80.8	80.0	80.0	ND	101	101	75-125	0	20
Copper	83.8	82.2	80.0	80.0	7.60	95	93	75-125	2	20
Nickel	77.6	76.2	80.0	80.0	ND	97	95	75-125	2	20
Zinc	108	107	80.0	80.0	28.2	100	99	75-125	1	20

SPIKE BLANK

Laboratory ID:	SB1031F1					
Arsenic	81.0		80.0	N/A	101	85-115
Cadmium	80.2		80.0	N/A	100	85-115
Copper	78.4		80.0	N/A	98	85-115
Nickel	78.2		80.0	N/A	98	85-115
Zinc	81.8		80.0	N/A	102	85-115





Data Qualifiers and Abbreviations

- A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.
- B - The analyte indicated was also found in the blank sample.
- C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.
- E - The value reported exceeds the quantitation range and is an estimate.
- F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.
- H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.
- I - Compound recovery is outside of the control limits.
- J - The value reported was below the practical quantitation limit. The value is an estimate.
- K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.
- L - The RPD is outside of the control limits.
- M - Hydrocarbons in the gasoline range are impacting the diesel range result.
- M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.
- N - Hydrocarbons in the lube oil range are impacting the diesel range result.
- N1 - Hydrocarbons in diesel range are impacting lube oil range results.
- O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.
- P - The RPD of the detected concentrations between the two columns is greater than 40.
- Q - Surrogate recovery is outside of the control limits.
- S - Surrogate recovery data is not available due to the necessary dilution of the sample.
- T - The sample chromatogram is not similar to a typical _____.
- U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
- U1 - The practical quantitation limit is elevated due to interferences present in the sample.
- V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.
- W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.
- X - Sample extract treated with a mercury cleanup procedure.
- X1 - Sample extract treated with a sulfuric acid/silica gel cleanup procedure.
- X2 - Sample extract treated with a silica gel cleanup procedure.
- Y - The calibration verification for this analyte exceeded the 20% drift specified in methods 8260 & 8270, and therefore the reported result should be considered an estimate. The overall performance of the calibration verification standard met the acceptance criteria of the method.
- Y1 - Negative effects of the matrix from this sample on the instrument caused values for this analyte in the bracketing continuing calibration verification standard (CCVs) to be outside of 20% acceptance criteria. Because of this, quantitation limits and sample concentrations should be considered estimates.
- Z -
- ND - Not Detected at PQL
- PQL - Practical Quantitation Limit
- RPD - Relative Percent Difference



