



## ENVISION ENVIRONMENTAL, INC.

February 12, 2012

Mr. Dale Myers  
State of Washington  
Department of Ecology, Northwest Regional Office  
3190 160<sup>th</sup> Avenue, SE  
Bellevue, WA 98008-5452

Re: Spill Incident No. 11-4213  
REXAM Beverage Can Company  
1220 North 2<sup>nd</sup> Avenue  
Kent, King County, WA 98008-5452  
VCP Site No. 35918556  
VCP Reference No. NW1105

ENVISION Project ID: 302.REX

Dear Mr. Myers:

As you are aware, ENVISION ENVIRONMENTAL, INC. (ENVISION) manages the Washington Department of Ecology (WADOE) Voluntary Cleanup Program (VCP) filing for the referenced Rexam Beverage Can Company (REXAM) facility. REXAM has also requested that ENVISION assist with addressing the recent release of hydraulic oil at this Site. This letter report has been prepared as an interim progress report to address this recent release and to document the follow-up activities conducted to date.

### Background

The release was approximately 10- to 15-gallons of hydraulic oil from a pressure fitting on the aluminum scrap baler located at the northeast corner of the Manufacturing Building. The release occurred and was reported to the WADOE on December 17, 2011, and the above referenced Spill Incident Number was assigned. The released hydraulic oil exited the facility through the overhead door located on the east side of the building at its northeast corner. The hydraulic oil impacted the adjacent asphalt pavement and a portion of the oil flowed to the east impacting the soil/gravel area adjacent to and east of the asphalt pavement. The release was immediately addressed by Site personnel by placing oil sorbent booms to prevent additional hydraulic oil from running off the asphalt pavement. Site personnel then used sorbent materials and a floor scrubber to remove the hydraulic oil from the asphalt pavement. No hydraulic oil was released to stormwater drains, the sanitary sewer system or to waterways. The Site contracted with Northwest Stormwater Maintenance (NSM) of Kent, WA to address the impacted soil/gravel area adjacent to the asphalt pavement. NSM excavated the impacted soil and gravel and transported approximately 7,000-pounds of soil/gravel/water removed from the area to AWS of Tacoma, WA for disposal on December 17, 2011. Upon completing the



excavation, the area was inspected and no evidence (visual or olfactory) of the release was observed in the soil/gravel area. The contractor placed plastic sheeting over the area to prevent rain from coming into contact with the excavated area. The resultant excavation measured approximately 12-feet by 20-feet by 4-inches deep. A copy of the report submitted to the King County Department of Natural Resources and Parks was previously forwarded to your attention on December 28, 2011 and is included here for your convenience as Attachment 1.

### Site Description

The Site is situated in an industrial area of Kent, WA and is located at the southeast corner of the intersection of North 2<sup>nd</sup> Avenue and South 228<sup>th</sup> Street. The Site latitude and longitude are 47.39° North Latitude and 122.23° West Longitude. The Site is located on approximately 6-acres of land within an industrial park on the south side of the O'Brien section of Kent. Two (2) 1-story high-bay buildings are located on the Site; consisting of a 130,615-square foot Manufacturing Building built in 1970 and a 100,000-square foot Warehouse Building built between 1977 and 1985. An asphalt parking lot and truck access area are located on the west side of the property. North 2<sup>nd</sup> Street is located to the west of the parking area with industrial/commercial buildings beyond. An unused railroad siding and the Burlington Northern Santa Fe (BNSF) Railroad main lines are located on the east side of the Site. A grassy area is located on the east side of the Manufacturing Building, between the railroad siding and the BNSF main rail lines. The southern side of the Site is also asphalt paved for truck access. Beyond the southern side of the Site are the railroad siding, Route 167 (Valley Freeway) and industrial/commercial buildings. The area north of the Manufacturing Building is now entirely paved and borders South 228<sup>th</sup> Street, which is now an overpass over the BNSF railroad tracks and is above the level of the Site. Industrial/commercial buildings are located across South 228<sup>th</sup> Street.

### Site Geology and Hydrogeology

The Site is located within the Puget Lowland Physiographic Province in King County, WA in the Renton 7.5-Minute Quadrangle. The approximate elevation is 37-feet above mean sea level. The Site topography is relatively flat in the area of the building with a slight regional slope to the west towards the Green River, which is located approximately 1.5-miles west of the Site. The surrounding properties are at approximately the same elevation as the Site. A ridge with approximately 100-feet of relief is located approximately 1-mile east of the Site.

Shallow sediments at the Site are of fluvial origin and are comprised of silts, sands, and gravels. Deeper units in the vicinity of the Site consist of fine-grained sediments and cobbles deposited by glacial advance and retreat. Previous borings conducted at the Site indicate that there appears to be 3-feet to 6-feet of fill materials (silt and sand) overlaying fine to very fine-grained, well-sorted sands and silts. The borings conducted by ENVISION as part of the VCP filing during the March 2005 groundwater investigation of the Site confirmed these findings. The thickness of the unconsolidated material at the Site has not been determined.



Regionally, soils reportedly have a high hydraulic conductivity and low water holding capacity. Depth to the water table is typically more than 6-feet below grade surface (bgs). The regional aquifer system is a prolific valley filled unconfined water table system that extends over 100-miles from Vancouver, Canada to Olympia, WA. The average thickness of the aquifer is approximately 2,000-feet.

Groundwater at the Site has been encountered between approximately 3.5-feet to 8.5-feet bgs. Previous investigations indicated that there appears to be perched water located north of the Manufacturing Building at a depth of approximately 3.5-feet bgs. The work conducted in March 2005 found groundwater in this area of the Site at approximately 8.5-feet bgs. The direction of groundwater flow observed in March 2005 was toward the northwest. Groundwater elevation data from the June 2010 and the April 2011 groundwater monitoring events conducted by ENVISION as part of the VCP filing shows that the direction of groundwater flow is generally to the northwest. Based on the relatively flat topographic gradient and the presence of surface water in the area, the groundwater gradient is likely to fluctuate both regionally and seasonally.

#### Hydraulic Oil Release Field Activities

On December 28, 2011, ENVISION personnel mobilized to the Site in preparation for soil sampling to determine if the soil excavation activities had removed all soil impacted by the hydraulic oil release. The area of the release and subsequent soil investigation is shown in Figure 1. The area was inspected to determine if field evidence of the release was apparent. No visual or olfactory evidence of the release was apparent. Due to heavy rains which had occurred after the release, low points in the excavation (still covered with the plastic sheeting) were filled with water. The excavation was approximately 4-inches deep on average (in many places only 2-inches deep), and was approximately rectangular in shape, about 20-feet by 12-feet in size. The hydrophobic sorbent pads that had been placed along the western side of the excavation by Site personnel, adjacent to the asphalt, were still in place. These were replaced by ENVISION personnel at the end of the soil investigation with sorbent socks as a preventive measure to capture any sheen on stormwater that may run off the adjacent asphalt pavement.

The water on top of the plastic sheeting in the excavation was observed to have a very slight discontinuous sheen. No soil staining was observed when the sheeting was removed. No free product was observed. It was raining moderately on December 28<sup>th</sup> and runoff from the asphalt pavement in the area was observed to have a slight sheen, but it appeared to be typical of paved parking areas. Runoff from upgradient asphalt paved areas that had not been impacted by the hydraulic oil release exhibited similar slight sheens as the runoff from the area of pavement that had been impacted by the release. The upgradient runoff was observed to flow towards the excavation and the nearby drainage swale beyond it along the main railroad line. Pictures of the area and the soil investigation activities are included in the Photo Log in Attachment 2.



The pavement in the area of the hydraulic oil release was in excellent physical condition, with no cracks or deteriorated areas. The joint between the pavement and a concrete sidewalk along the east wall of the building was also in excellent condition. No stains or sheens were observed in the area of the joint and on the building wall. See pictures in the Photo Log.

ENVISION retained ESN Northwest (ESN) of Olympia, WA to conduct the soil borings. ESN had called the Utilities Underground Location Center to mark-out public utilities. In order to verify the public utility mark-out and to determine if any unmarked utilities were present in the area, ENVISION also contracted with Applied Professional Services (APS) of North Bend, WA to survey the area to verify the absence of utilities.

On December 29, 2011, ENVISION supervised the installation of nine (9) soil borings (SB201 – SB209) as shown on Figure 2. The boring installation was conducted by a licensed driller from ESN using a truck-mounted direct push technology (DPT) drill rig. All borings were installed to 4-foot bgs using a 2-inch diameter, 4-foot long stainless steel MacroCore sampler. The sampler was fitted with disposable PVC liners that were changed between samples. The soil cores were screened using an organic vapor monitor (OVM) equipped with a photoionization detector (PID) with a 10.6 eV lamp. The OVM was calibrated in the field before beginning work to a standard of 100 parts per million (ppm) of isobutylene. Lithologies were logged by an ENVISION geologist. Reusable downhole equipment (e.g. steel components of the MacroCore sampler) was decontaminated between borings by washing with a solution of Alconox and water, a tap water rinse, and a final deionized water rinse. Field personnel wore nitrile gloves which were changed between samples. Decontamination water and soil cuttings were placed into 55-gallon steel drums, labeled, and staged in an area designated by Site personnel for subsequent proper offsite disposal.

Soil samples were collected from selected intervals from each boring. The sample intervals are shown on the soil boring logs, which are included as Attachment 3. The sampling intervals were selected based on the likelihood of impact from the release, intervals where field evidence of impact was observed, and intervals that would permit delineation of potential impacts. Soil samples were collected into new laboratory-supplied sample containers using disposable plastic trowels, placed into a laboratory-supplied cooler with ice, and transported under chain of custody procedures to Friedman & Bruya, Inc., a State of Washington accredited analytical laboratory. The samples were submitted for analysis of diesel range organics (DRO) and motor oil range organic fraction via the NWTPH-Dx analytical method and for polycyclic aromatic hydrocarbons (PAHs) via USEPA Method 8270D SIM. These parameters were selected based on the identity of the material released. Polychlorinated biphenyls (PCBs) were not analyzed for since the MSDS for the hydraulic oil did not indicate their presence. Certain samples were placed on hold to be analyzed, if necessary, to provide delineation. A duplicate sample was collected at location SB205A. A field blank sample was also collected for all parameters analyzed for by pouring laboratory-supplied analyte-free water over new sampling equipment and collecting it in appropriately preserved laboratory-supplied sample containers for analysis.

The borings typically encountered approximately 2-feet of gravelly fine sand fill with variable silt and clay content. Dark gray silty clay, which was wet at 3.5-foot bgs, was encountered below



this unit. However, borings SB207 and SB209 exhibited fine sand with few fines to the end of the boring. This is reportedly a typical fill material used in the area. Based on the locations it was encountered, it was probably emplaced when the area was paved during the construction of the South 228<sup>th</sup> Street overpass.

In SB206, a septic odor was observed from 1.5- to 2-foot bgs and a reading of 17 response units was obtained on the PID. From 2- to 2.5-foot bgs, a gasoline-like odor was also observed in this boring. A PID reading of 36 response units was obtained from this interval. No odors were observed below this depth and PID readings were relatively low (5 response units) in the remainder of the boring. None of the remaining borings exhibited PID readings above background or any other field evidence of impact. The background PID readings during the sampling event ranged from 0.1 to 0.2 response units.

#### Analytical Results

The analytical results are summarized in Table 1. No analytes were detected in either the field or the method blanks. The results for the duplicate and the original sample are in general agreement. The laboratory report did not identify any significant issues that would impact data quality, with the exception that laboratory interpretation of the raw data from several samples indicated that there was a contribution from the motor oil range to the DRO analytical results. This would tend to bias the DRO results high. Given the purpose of the data and the results obtained, this is not considered a significant issue. The laboratory results report is included as Attachment 4.

The MTCA Method A criterion for DRO is 2,000 mg/Kg and is comprised of the aggregate of hydrocarbons in the C<sub>10</sub> to C<sub>25</sub> range for diesel and C<sub>25</sub> to C<sub>36</sub> range for motor oil. For the purposes of assessing potential hydraulic oil impacts requiring corrective action, ENVISION compared the motor oil fractions of each sample to the 2,000 mg/Kg criterion for DRO. Hydraulic oil would more likely be expected to be detected within the C<sub>25</sub> to C<sub>36</sub> range. In the samples collected around the excavation, only SB204A exhibited an exceedance of a MTCA Method A criterion with a motor oil concentration of 3,000 mg/Kg. This sample was collected from under asphalt pavement near the eastern edge of the paved area adjacent to the excavation. The deeper sample in this boring did not exhibit detectable concentrations of any TPH fraction.

For the samples collected under asphalt pavement between the Site building and the excavation, motor oil range fractions were detected in samples from boring SB206. Boring SB206 is located adjacent to the Manufacturing Building where the hydraulic oil release originated and exhibited exceedances of the MTCA Method A criterion for motor oil range fractions at 0.5- to 1.0-foot bgs (6,600 mg/Kg); at 1.5- to 2-foot bgs (11,000 mg/Kg); and at 2.0- to 2.5-foot bgs (4,500 mg/Kg). The latter two (2) samples also exhibited DRO fractions above the MTCA Method A criterion at 6,800 mg/Kg and 2,300 mg/Kg, respectively. The sample from SB207 collected at 1.5- to 2.0-foot bgs exhibited motor oil range fractions at 5,900 mg/Kg (above the MTCA Method A criterion). This sample also contained DRO fractions at 2,000



mg/Kg (equal to the MTCA Method A criterion; note that this result was qualified by the laboratory as containing a contribution from the motor oil range). The delineation samples collected from this area did not exhibit significant detections of these analytes.

Trace concentrations of PAHs were detected in several samples. None were above their MTCA Method A cleanup level.

### Discussion

Based on the vertical distribution of the motor oil concentrations observed in SB206, it appears that the impact in this area is not due to the hydraulic oil release. First, if the impact was due to the hydraulic oil release, it would be expected that the shallowest sample would exhibit the highest motor oil concentration, and the concentrations would decrease with increasing depth. In any case, exceedances of the MTCA Method A criteria at depth would not be expected due to the immediate detection and cleanup of the hydraulic oil release; this is not the case. Second, the area is covered by newly installed impervious surfaces, which are in excellent condition. Thus, it appears that these results may be associated with an historical issue in this area. Based on the lack of detections in borings SB208 and SB209, it appears that this historical impact is limited to the area of the building, including the area of boring SB207. As a reminder, impact beneath the building in this area has been observed in the area of the baler, as documented in the VCP filing. The detections reported for borings SB206 and SB207 are probably related to the historical baler room impact and not the recent hydraulic oil release.

The reported exceedance of motor oil above its MTCA Method A criterion in SB204A may also be related to an historical issue as this area of the Site was previously unpaved. The area of boring SB204A was a railroad siding and historically served as an access area for railroad and utility company vehicles and contractors. Prior to construction of the South 228<sup>th</sup> Street overpass, this area would have received run-off from South 228<sup>th</sup> Street as well as from the railroad crossing at South 228<sup>th</sup> Street. Personnel doors and an overhead door that provided access to the north side of the Manufacturing Building were historically accessed from two (2) paved driveways off of South 228<sup>th</sup> Street. During the construction of the South 228<sup>th</sup> Street overpass, this area was also used for staging construction materials and for contractor vehicle parking, both prior to and after being asphalt paved. The exceedance is limited to immediately below the asphalt pavement and immediately adjacent to the excavation.

Based on the post-excavation soil sampling results, ENVISION requests that the Spill Incident for the hydraulic oil release be closed out. The exceedances observed in soil borings SB204, SB206 and SB207 are not associated with the recent hydraulic oil release, but appear to be related to historical issues in this area of the Site. As a result, this area of the Site will be investigated further in the next phase of the ongoing VCP investigation of the Site, and these data will be incorporated into the Site Characterization phase of the VCP Site Investigation Workplan.



Mr. Dale Myers  
WA DOE, Northwest Regional Office  
REXAM Beverage Can Company  
VCP Site No. 35918556  
Spill Incident No. 11-4213  
February 12, 2012  
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Please do not hesitate to contact us if you have any questions or concerns regarding this information.

Very truly yours,

A handwritten signature in blue ink, appearing to read "John H. Weakliem".

John H. Weakliem, P.G.  
Senior Geologist

A handwritten signature in blue ink, appearing to read "Mark P. Roman".

Mark P. Roman  
President

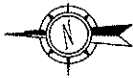
Cc: Frank Brown, REXAM INC.  
Geoff Wortley, REXAM Beverage Can Company  
Scott L. Kriesel, REXAM Beverage Can Company



**FIGURES**

SOUTH 228th STREET

OVERPASS



2nd AVENUE NORTH

ASPHALT PAVEMENT

LOCATION OF  
AREA OF  
INVESTIGATION  
OF HYDRAULIC  
OIL RELEASE

MANUFACTURING  
BUILDING

PAVEMENT

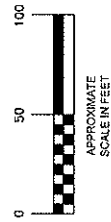
CONCRETE SIDEWALK

RAILROAD SIDING

GRASSY AREA

DRAINAGE SWALE

RAILROAD MAIN LINE



APPROXIMATE  
SCALE IN FEET

NOTES:

RAILROAD SIDINGS SHOWN IN APPROXIMATE LOCATIONS.



REXAM BEVERAGE CAN CO.  
1220 NORTH 2nd AVENUE  
KENT, WASHINGTON 98032  
AREA OF INVESTIGATION

Revisions:

Project No.

302-REX

Date:

01/25/12

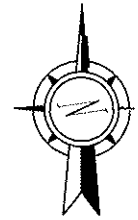
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Drawn by:

Utility No.

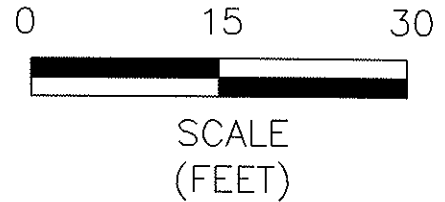
FIGURE 1

# SOUTH 228th STREET OVERPASS

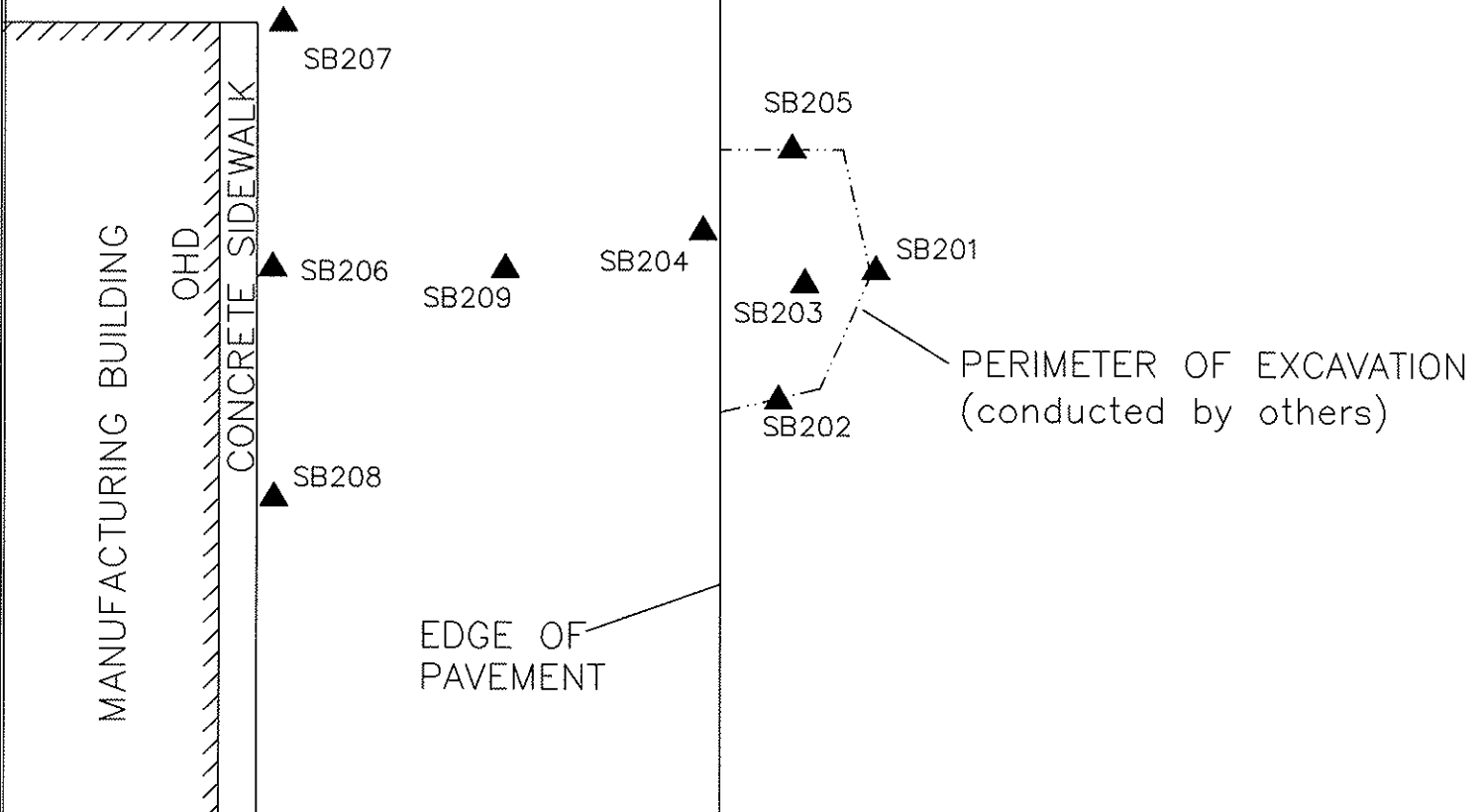


## LEGEND:

- SB201▲ = SOIL BORING
- OHD = OVERHEAD DOOR



ASPHALT  
PAVEMENT



**Envision Environmental, Inc.**  
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REXAM BEVERAGE CAN CO.  
1220 NORTH 2nd AVENUE  
KENT, WASHINGTON 98032  
HYDRAULIC OIL RELEASE  
SOIL BORING LOCATIONS

<i>Revisions:</i>

<i>Project No.</i>	302.REX
<i>Date:</i>	01/25/12
<i>Scale:</i>	As Shown
<i>Drawing No.</i>	FIGURE 2



**TABLES**

TABLE 1  
 Summary of Soil Analytical Results  
 Hydraulic Oil Release Investigation  
 December 2011  
 REXAM BEVERAGE CAN COMPANY  
 Kent, Washington

Sample ID No. Laboratory ID No. Date Sampled Depth (feet below surface)	MTCA Method A Cleanup Level Unrestricted Land Use (mg/Kg)	MTCA Method A Cleanup Level Industrial Properties (mg/Kg)	MTCA Method B Unrestricted Land Use Value (Direct Contact) (mg/Kg)	USEPA Risk- Based SSL Protection of Groundwater (mg/Kg)	SB201A 112394-01 12/29/2011 0.0-0.5 mg/Kg	SB202A 112394-03 12/29/2011 0.0-0.5 mg/Kg	SB203A 112394-05 12/29/2011 0.0-0.5 mg/Kg	SB204A 112394-07 12/29/2011 0.3-0.8 mg/Kg	SB204B 112394-08 12/29/2011 2.0-2.5 mg/Kg
<b>Total Petroleum Hydrocarbons (TPH) (mg/Kg)</b>									
NWTPH-Dx									
Diesel (C10-C25)	2,000	2,000	NE	NE	<50	<50	<50	260 x	<50
Motor Oil (>C25-C36)	2,000	2,000	NE	NE	<250	<250	320	3,000	<250
<b>Polycyclic Aromatic Hydrocarbons (mg/Kg)</b>									
Naphthalene	5	5	1,600	0.00047	<0.01	<0.01	<0.01	<0.01	<0.01
Acenaphthylene	NE	NE	NE	NE	<0.01	<0.01	<0.01	<0.01	<0.01
Acenaphthene	NE	NE	4,800	4.1	<0.01	<0.01	<0.01	<0.01	<0.01
Fluorene	NE	NE	3,200	4.0	<0.01	<0.01	<0.01	<0.01	<0.01
Phenanthrene	NE	NE	NE	NE	0.010	<0.01	<0.01	<0.01	<0.01
Anthracene	NE	NE	24,000	42	<0.01	<0.01	<0.01	<0.01	<0.01
Fluoranthene	NE	NE	3,200	70	0.027	<0.01	<0.01	<0.01	<0.01
Pyrene	NE	NE	2,400	9.5	0.025	0.010	<0.01	<0.01	<0.01
Benzo(a)anthracene*	NE	NE	1.4	0.010	0.013	<0.01	<0.01	<0.01	<0.01
Chrysene*	NE	NE	140	1.10	0.018	0.022	<0.01	<0.01	<0.01
Benzo(a)pyrene*	0.1	2.0	0.14	0.0035	0.015	<0.01	<0.01	<0.01	<0.01
Benzo(b)fluoranthene*	NE	NE	1.4	0.035	0.023	<0.01	<0.01	<0.01	<0.01
Benzo(k)fluoranthene*	NE	NE	14	0.35	<0.01	<0.01	<0.01	<0.01	<0.01
Indeno(1,2,3-cd)pyrene*	NE	NE	1.4	0.12	0.012	<0.01	<0.01	<0.01	<0.01
Dibenz(a,h)anthracene*	NE	NE	0.14	0.011	<0.01	<0.01	<0.01	<0.01	<0.01
Benzo(g,h,i)perylene	NE	NE	NE	NE	0.012	0.012	<0.01	<0.01	<0.01

Notes:  
 Highlighted concentrations equal or exceed a regulatory cleanup criteria.  
 mg/Kg = milligram per kilogram  
 µg/L = microgram per liter

DUP = Duplicate sample collected from sample location SB205A.  
 \* = Carcinogenic PAH. Standard for total carcinogenic PAH via toxicity equivalency method is that of benzo(a)pyrene

x = The sample chromatographic pattern does not resemble the fuel standard used for qualification. The laboratory commented that the chromatograms indicate contribution from motor oil fraction to analytical result.

+ = The sample was diluted and reanalyzed for Polycyclic Aromatic Hydrocarbons.  
 J = The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.  
 <0.01 = Not detected at reported concentration.

NA = Not applicable  
 NE = Not established

MTCA Method B values are most stringent values taken from CLARC database. These are not standards, but are provided for comparison purposes for analytes with no Method A standard.

USEPA Risk Based Soil Screening Levels (SSL) for protection of groundwater are provided for comparison purposes for analytes with no Method A standard.

MTCA = Model Toxics Control Act

CLARC = Cleanup Levels and Risk Calculation

USEPA = United States Environmental Protection Agency

TABLE 1  
 Summary of Soil Analytical Results  
 Hydraulic Oil Release Investigation  
 December 2011  
 REXAM BEVERAGE CAN COMPANY  
 Kent, Washington

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<b>Total Petroleum Hydrocarbons (TPH) (mg/Kg)</b>									
NWTPH-DX									
Diesel (C10-C25)	2,000	2,000	NE	NE	110 x	<50	880 x	6,800	---
Motor Oil (>C25-C36)	2,000	2,000	NE	NE	370	<250	6,600	11,000	---
<b>Polycyclic Aromatic Hydrocarbons (mg/Kg)</b>									
Naphthalene	5	5	1,600	0.00047	<0.01	<0.01	<0.1	0.47	<0.5
Acenaphthylene	NE	NE	NE	NE	<0.01	<0.01	<0.1	0.60	<0.5
Acenaphthene	NE	NE	4,800	4.1	<0.01	<0.01	<0.1	<0.1	<0.5
Fluorene	NE	NE	3,200	4.0	<0.01	<0.01	<0.1	<0.1	<0.5
Phenanthrene	NE	NE	NE	NE	<0.01	<0.01	<0.1	<0.1	<0.5
Anthracene	NE	NE	24,000	42	<0.01	<0.01	<0.1	<0.1	<0.5
Fluoranthene	NE	NE	3,200	70	<0.01	<0.01	<0.1	<0.1	<0.5
Pyrene	NE	NE	2,400	9.5	<0.01	<0.01	<0.1	0.28	<0.5
Benzo(a)anthracene*	NE	NE	1.4	0.010	<0.01	<0.01	<0.1	<0.1	<0.5
Chrysene*	NE	NE	140	1.10	<0.01	<0.01	<0.1	0.23	<0.5
Benzo(a)pyrene*	0.1	2.0	0.14	0.0035	<0.01	<0.01	0.15	<0.1 J	<0.5
Benzo(b)fluoranthene*	NE	NE	1.4	0.035	<0.01	<0.01	<0.1	<0.1 J	<0.5
Benzo(k)fluoranthene*	NE	NE	14	0.35	<0.01	<0.01	<0.1	<0.1 J	<0.5
Indeno(1,2,3-cd)pyrene*	NE	NE	1.4	0.12	<0.01	<0.01	<0.1	<0.1 J	<0.5
Dibenz(a,h)anthracene*	NE	NE	0.14	0.011	<0.01	<0.01	<0.1	<0.1 J	<0.5
Benzo(g,h,i)perylene	NE	NE	NE	NE	<0.01	<0.01	0.12	<0.1 J	<0.5

Notes:

Highlighted concentrations equal or exceed a regulatory cleanup criteria.

mg/Kg = milligram per kilogram

µg/L = microgram per liter

DUP = Duplicate sample collected from sample location SB205A.

\* = Carcinogenic PAH. Standard for total carcinogenic PAH via toxicity equivalency method is that of benzo(a)pyrene  
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USEPA = United States Environmental Protection Agency

TABLE 1  
 Summary of Soil Analytical Results  
 Hydraulic Oil Release Investigation  
 December 2011  
 REXAM BEVERAGE CAN COMPANY  
 Kent, Washington

Sample ID No. Laboratory ID No.	MTCA Method A Cleanup Level Unrestricted Land Use (mg/Kg)	MTCA Method A Cleanup Level Industrial Properties (mg/Kg)	MTCA Method B Unrestricted Land Use Value (Direct Contact) (mg/Kg)	USEPA Risk- Based SSL Protection of Groundwater (mg/Kg)	SB206C 112394-13 12/29/2011 2.0-2.5 mg/Kg	SB206C* 112394-13 12/29/2011 2.0-2.5 mg/Kg	SB206D 112394-14 12/29/2011 3.5-4.0 mg/Kg	SB207A 112394-15 12/29/2011 1.5-2.0 mg/Kg	SB207A* 112394-15 12/29/2011 1.5-2.0 mg/Kg
<b>Total Petroleum Hydrocarbons (TPH) (mg/Kg)</b>									
NWTPH-DX									
Diesel (C10-C25)	2,000	2,000	NE	NE	2,300	---	79 x	2,000 x	---
Motor Oil (>C25-C36)	2,000	2,000	NE	NE	4,500	---	<250	5,900	---
<b>Polycyclic Aromatic Hydrocarbons (mg/Kg)</b>									
Naphthalene	5	5	1,600	0.00047	1.2	1.2	0.018	<0.01	<0.01
Acenaphthylene	NE	NE	NE	NE	<0.01	0.13	<0.01	<0.01	<0.01
Acenaphthene	NE	NE	4,800	4.1	0.035	<0.1	<0.01	<0.01	<0.01
Fluorene	NE	NE	3,200	4.0	0.065	<0.1	<0.01	<0.01	<0.01
Phenanthrene	NE	NE	NE	NE	0.21	0.23	<0.01	<0.01	<0.01
Anthracene	NE	NE	24,000	42	<0.01	<0.1	<0.01	<0.01	<0.01
Fluoranthene	NE	NE	3,200	70	0.015	<0.1	<0.01	<0.01	<0.01
Pyrene	NE	NE	2,400	9.5	0.13 J	<0.1	<0.01	0.019 J	<0.01
Benzo(a)anthracene*	NE	NE	1.4	0.010	0.011 J	<0.1	<0.01	0.012 J	<0.01
Chrysene*	NE	NE	140	1.10	0.061 J	<0.1	<0.01	0.016 J	<0.01
Benzo(a)pyrene*	0.1	2.0	0.14	0.0035	<0.01 J	<0.1	<0.01	<0.01 J	<0.01
Benzo(b)fluoranthene*	NE	NE	1.4	0.035	<0.01 J	<0.1	<0.01	<0.01 J	<0.01
Benzo(k)fluoranthene*	NE	NE	14	0.35	<0.01 J	<0.1	<0.01	<0.01 J	<0.01
Indeno(1,2,3-cd)pyrene*	NE	NE	1.4	0.12	<0.01 J	<0.1	<0.01	0.015 J	<0.01
Dibenz(a,h)anthracene*	NE	NE	0.14	0.011	<0.01 J	<0.1	<0.01	<0.01 J	<0.01
Benzo(g,h,i)perylene	NE	NE	NE	NE	<0.01 J	<0.1	<0.01	0.020 J	<0.01

**Notes:**

Highlighted concentrations equal or exceed a regulatory cleanup criteria.

mg/Kg = milligram per kilogram

µg/L = microgram per liter

DUP = Duplicate sample collected from sample location SB205A.

\* = Carcinogenic PAH. Standard for total carcinogenic PAH via toxicity equivalency method is that of benzo(a)pyrene  
 x = The sample chromatographic pattern does not resemble the fuel standard used for qualification. The laboratory  
 commented that the chromatograms indicate contribution from motor oil fraction to analytical result.

+ = The sample was diluted and reanalyzed for Polycyclic Aromatic Hydrocarbons.

J = The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.  
 <0.01 = Not detected at reported concentration.

NA = Not applicable

NE = Not established

MTCA Method B values are most stringent values taken from CLARC database. These are not standards, but are

provided for comparison purposes for analytes with no Method A standard.

USEPA Risk Based Soil Screening Levels (SSL) for protection of groundwater are provided for comparison purposes for  
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<b>Total Petroleum Hydrocarbons (TPH) (mg/Kg)</b>							
NW/TPH-Dx							
Diesel (C10-C25)	2,000	2,000	NE	NE	<50	<50	<50
Motor Oil (>C25-C36)	2,000	2,000	NE	NE	<250	<250	<250
<b>Polycyclic Aromatic Hydrocarbons (mg/Kg)</b>							
Naphthalene	5	5	1,600	0.00047	0.038	<0.01	<0.01
Acenaphthylene	NE	NE	NE	NE	<0.01	<0.01	<0.01
Acenaphthene	NE	NE	4,800	4.1	<0.01	<0.01	<0.01
Fluorene	NE	NE	3,200	4.0	<0.01	<0.01	<0.01
Phenanthrene	NE	NE	NE	NE	<0.01	<0.01	<0.01
Anthracene	NE	NE	24,000	42	<0.01	<0.01	<0.01
Fluoranthene	NE	NE	3,200	70	<0.01	<0.01	<0.01
Pyrene	NE	NE	2,400	9.5	<0.01	<0.01	<0.01
Benzo(a)anthracene*	NE	NE	1.4	0.010	<0.01	<0.01	<0.01
Chrysene*	NE	NE	140	1.10	<0.01	<0.01	<0.01
Benzo(a)pyrene*	0.1	2.0	0.14	0.0035	<0.01	<0.01	<0.01
Benzo(b)fluoranthene*	NE	NE	1.4	0.035	<0.01	<0.01	<0.01
Benzo(k)fluoranthene*	NE	NE	14	0.35	<0.01	<0.01	<0.01
Indeno(1,2,3-cd)pyrene*	NE	NE	1.4	0.12	<0.01	<0.01	<0.01
Dibenz(a,h)anthracene*	NE	NE	0.14	0.011	<0.01	<0.01	<0.01
Benzo(g,h,i)perylene	NE	NE	NE	NE	<0.01	<0.01	<0.01

Notes:

Highlighted concentrations equal or exceed a regulatory cleanup criteria.

mg/Kg = milligram per kilogram

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+ = The sample was diluted and reanalyzed for Polycyclic Aromatic Hydrocarbons.

J = The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.  
 <0.01 = Not detected at reported concentration.

NA = Not applicable  
 NE = Not established

MTCB Method B values are most stringent values taken from CLARC database. These are not standards, but are provided for comparison purposes for analytes with no Method A standard.

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Sample ID No.	MTCA Method A Cleanup Level Unrestricted Land Use (mg/Kg)	MTCA Method A Cleanup Level Industrial Properties (mg/Kg)	MTCA Method B Unrestricted Land Use Value (Direct Contact) (mg/Kg)	USEPA Risk-Based SSL Protection of Groundwater (mg/Kg)	SB209A 112394-19 12/29/2011 1.5-2.0 mg/Kg	SB209B 112394-20 12/29/2011 2.0-2.25 mg/Kg	Field Blank 112394-22 12/29/2011 NA
<b>Total Petroleum Hydrocarbons (TPH) (mg/Kg)</b>							
NWTPH-Dx							
Diesel (C10-C25)	2,000	2,000	NE	NE	<50	<50	<50
Motor Oil (>C25-C36)	2,000	2,000	NE	NE	<250	<250	<250
<b>Polycyclic Aromatic Hydrocarbons (mg/Kg)</b>							
Naphthalene	5	5	1,600	0.00047	<0.01	<0.01	<0.1
Acenaphthylene	NE	NE	NE	NE	<0.01	<0.01	<0.1
Acenaphthene	NE	NE	4,800	4.1	<0.01	<0.01	<0.1
Fluorene	NE	NE	3,200	4.0	<0.01	<0.01	<0.1
Phenanthrene	NE	NE	NE	NE	<0.01	<0.01	<0.1
Anthracene	NE	NE	24,000	42	<0.01	<0.01	<0.1
Fluoranthene	NE	NE	3,200	70	<0.01	<0.01	<0.1
Pyrene	NE	NE	2,400	9.5	<0.01	<0.01	<0.1
Benzo(a)anthracene*	NE	NE	1.4	0.010	<0.01	<0.01	<0.1
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Benzo(a)pyrene*	0.1	2.0	0.14	0.0035	<0.01	<0.01	<0.1
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Benzo(k)fluoranthene*	NE	NE	14	0.35	<0.01	<0.01	<0.1
Indeno(1,2,3-cd)pyrene*	NE	NE	1.4	0.12	<0.01	<0.01	<0.1
Dibenz(a,h)anthracene*	NE	NE	0.14	0.011	<0.01	<0.01	<0.1
Benzo(g,h,i)perylene	NE	NE	NE	NE	<0.01	<0.01	<0.1

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**ATTACHMENT 1**

Report to King County Department of Natural Resources and Parks



December 28, 2011

Mr. Dale Myers  
State of Washington  
Department of Ecology, Northwest Regional Office  
3190 160<sup>th</sup> Avenue, SE  
Bellevue, WA 98008-5452

Re: Spill Incident 11-4213  
REXAM Beverage Can Company  
1220 North 2<sup>nd</sup> Avenue  
Kent, King County, WA 98032  
Site No. 35918556

ENVISION Project ID: 302.REX

Dear Mr. Myers:

Enclosed please find a copy of a report that was submitted by Rexam Beverage Can Company to the King County Department of Natural Resources and Parks pertaining to a December 17, 2011 release of hydraulic fluid at the referenced facility (Spill Incident 11-4213). The enclosed report contains the details on the release incident and the associated corrective actions conducted to date.

Please note that Abraham Platt of ENVISION ENVIRONMENTAL, INC. (ENVISION) attempted to contact you regarding this issue on December 19, 2011. Since you were on vacation at the time of our call, Mr. Platt spoke to your supervisor – Mr. Russ Olsen. ENVISION discussed this release incident with Mr. Olsen, and according to Mr. Olsen, this release incident and the associated corrective actions can be reported as part of the existing VCP filing. As a result, ENVISION will provide the Washington Department of Ecology with the results of the release investigation in the next VCP submission. Please note that ENVISION is scheduled to collect soil samples from the area of the release on December 29, 2011. We will contact you to discuss this issue upon your return from vacation on January 3, 2012.

Please do not hesitate to contact us if you have any questions or concerns regarding this information.

Very truly yours,

Mark P. Roman  
President

December 20, 2011

CERTIFIED

Department of Natural Resources & Parks  
130 Nickerson Street  
Suite 200  
Seattle, WA. 98109-1658

**RE: Rexam Beverage Can Co., Kent, Washington  
Spill incident 11-4213**

Dear Sir or Madam:

In accordance with our SPCC Plan, this written report is being sent to you for your review. On Saturday December 17, 2011 a leak occurred at our facility which resulted in hydraulic oil coming in contact with soil on our property. Attached please find all required information regarding the incident, clean-up, and continued follow up.

We trust this information fulfills our reporting obligations to date and reserve the right to supplement or amend this submittal should new information so warrant. If you have any questions regarding this submittal, please contact Scott Kriesel at (253) 854-5580 or Geoff Wortley at (773) 399-3389.

Sincerely,

Otto Sosapavone  
Plant Manager

Attachment

cc: S. Kriesel, Rexam, Kent  
G. Wortley, Rexam, Chicago

## SPILL DOCUMENTATION FORM

**Facility Name & Location:** Rexam Beverage Can Company  
1220 North 2<sup>nd</sup> Avenue  
Kent, WA 98032

**Date and Time of Spill Event:** 12/17/11 – 1:00 AM Weather: Clear; no rain

**Product Spilled:** Mobil DTE 26 Hydraulic Oil (see attached MSDS)

**Medium Affected:** Asphalt and Soil/Gravel

**Location of Spill:** Northern most bay door on east side of building  
(see attached figure)

### **Description of Event:**

Maintainer was called to the baler (a scrap metal compactor), where hydraulic oil was spraying out of area behind baler. Maintainer shut it down and called supervisor to the baler. The ½” pressure gauge hose coming off of the east pump pressure regulator had broken the fitting between the flexible line and the regulator body and hydraulic fluid was spraying out of the unit. The baler had been down the last couple of days for maintenance and both hydraulic pumps had been replaced. There was a large pile of scrap aluminum east of the baler and the hydraulic fluid was spraying into that pile. After the maintainer had repaired the leak and got the baler back on line, he moved some of the scrap to ensure the hydraulic fluid had flowed into the floor trench surrounding the baler area. There was very little fluid in the trench. As he looked around for the hydraulic fluid, he noticed the released hydraulic fluid passed through the pile of scrap aluminum and had been hitting the bay door behind it. The scrap was too deep to approach the door from the inside, so he went around outside and found the hydraulic fluid had run under the door, onto the asphalt then ran down to the gravel / soil beyond it. He immediately notified a supervisor and the spill team gathered the oil booms from the spill kits and tried to prevent anymore oil from running off the asphalt. Approximately 10-15 gallons of oil was released to the asphalt with a portion of that subsequently released to ground cover. No oil was released to storm drains, sewer systems, or waterways.

**Personnel Involved:** Mike Murphy (Supervisor)  
Rafael Sarmiento (Front End Maintainer)

**Personnel Notified:** Scott Kriesel

**Agencies Notified:** WDOE  
Incident # - 11-4213

### **Countermeasures:**

Broken fittings replaced. Oil removed from asphalt with absorbent media and floor scrubber machine. Northwest Stormwater Maintenance (NSM) of Kent, WA was contracted immediately to excavate all impacted soil/gravel. Approximately 7,000 lbs. of soil/gravel/water were

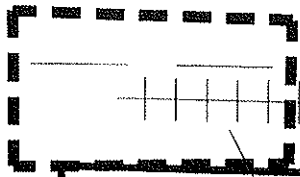
excavated on 12/17/11 by NSM and transported to AWS in Tacoma for disposal. All visually impacted material was excavated, which resulted in an excavation that is approximately 10 feet x 15 feet x 4 inches deep. After completing the excavation, the area was closely inspected and no evidence (visual or olfactory) of the released hydraulic fluid was observed in the soil/gravel area. Plastic tarps were placed over the area to prevent rain water from coming into contact with the excavated area. All excavated materials and clean-up wastes were disposed of by NSM. Envision Environmental, Inc. will be conducting soil testing during the week of December 26, 2011 to confirm that all impacted material has been excavated. Soil samples will be collected for NWTPII-Dx and carcinogenic PAH analyses. Please note that this facility is currently enrolled under the WA DOE VCP for a facility-wide investigation (VCP Site No. 35918556 and VCP Reference No. NW1105). According to the WA DOE (Russ Olsen), this hydraulic fluid release investigation can be reported as part of the existing VCP filing. As a result, we will provide the WA DOE with the results of the release investigation in the next VCP submission. The facility's WA DOE VCP Case Manager Dale Myers (Russ Olsen is Mr. Myers' supervisor) is on vacation until January 3, 2012. Mr. Myers will be contacted upon his return from vacation to update him on the release investigation.

**Preventative Measures:**

Annual inspection preventive maintenance will be instituted for this piece of equipment. The floor on outside of door will have a concrete berm installed to mitigate any potential releases from exiting building.

SOUTH 228th STREET

2nd AVENUE NORTH



APPROXIMATE  
LOCATION OF  
EXCAVATION  
AREA

MANUFACTURING  
BUILDING

RAILROAD SIDING

NOTES:

RAILROAD LINES SHOWN IN APPROXIMATE  
LOCATIONS.



*Envision Environmental, Inc.*  
11 Shady Hollow Court, Kenton, MI 48849  
Phone: 609-268-1855 Fax: 609-268-1899

REXAM BEVERAGE CAN CO.  
1220 NORTH 2nd AVENUE  
KENT, WASHINGTON 98032  
WORK AREA

Project No.	302-REX
Date	12/19/11
Scale	M.I.S.
Drawn By	
Checked By	
FIGURE A	

602649-00 MOBIL DTE 26  
MATERIAL SAFETY DATA BULLETIN

1. PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: MOBIL DTE 26 *Delvaco*  
SUPPLIER: MOBIL OIL CORP.  
NORTH AMERICA MARKETING AND REFINING  
3225 GALLOWES RD.  
FAIRFAX, VA 22037  
24 - Hour Emergency (call collect): 609-737-4411  
Product and MSDS Information: 800-662-4525 856-224-4644  
CHEMPREC: 800-424-9300 202-483-7616

2. COMPOSITION/INFORMATION ON INGREDIENTS

CHEMICAL NAMES AND SYNONYMS: PET. HYDROCARBONS AND ADDITIVES  
INGREDIENTS CONSIDERED HAZARDOUS TO HEALTH:  
This product is not formulated to contain ingredients which have exposure limits established by U.S. agencies. It is not hazardous to health as defined by the European Union Dangerous Substances/Preparations Directives. See Section 15 for a regulatory analysis of the ingredients.  
See Section 15 for European Label Information.  
See Section 8 for exposure limits (if applicable).

3. HAZARDS IDENTIFICATION

US OSHA HAZARD COMMUNICATION STANDARD: Product assessed in accordance with OSHA 29 CFR 1910.1200 and determined not to be hazardous.  
EFFECTS OF OVEREXPOSURE: No significant effects expected.  
EMERGENCY RESPONSE DATA: Amber Liquid. Note: Pressurized mists may form a flammable mixture. DOT ERG No. - NA

4. FIRST AID MEASURES

EYE CONTACT: Flush thoroughly with water. If irritation occurs, call a physician.  
SKIN CONTACT: Wash contact areas with soap and water. High pressure accidental injection through the skin requires immediate medical attention for possible incision, irrigation and/or debridement.  
INHALATION: Not expected to be a problem.  
INGESTION: Not expected to be a problem. However, if greater than 1/2 liter (pint) ingested, seek medical attention.

5. FIRE-FIGHTING MEASURES

EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical and water fog.  
SPECIAL FIRE FIGHTING PROCEDURES: Water or foam may cause frothing. Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.  
SPECIAL PROTECTIVE EQUIPMENT: For fires in enclosed areas, fire fighters must use self-contained breathing apparatus.  
UNUSUAL FIRE AND EXPLOSION HAZARDS: Note: Pressurized mists may form a flammable mixture. Flash Point C(F): > 204(399) (ASTM D-92).  
Flammable limits - LEL: NA, UEL: NA.  
NFPA HAZARD ID: Health: 0, Flammability: 1, Reactivity: 0  
HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide. Metal oxides. Elemental oxides.

6. ACCIDENTAL RELEASE MEASURES

NOTIFICATION PROCEDURES: Report spills as required by appropriate authorities. In U.S. Coast Guard regulations require immediate reporting of spills that could reach any waterway including inland/estuary creeks. Report spill to Coast Guard toll free number (800) 474-8602. In case of accident or road spill notify CHEMTREC (800) 424-9300.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: Absorb in fire retardant coated sawdust, diatomaceous earth, etc. Pick up and dispose of at an appropriate waste disposal facility in accordance with current applicable laws and regulations, and product characteristics at time of disposal.

ENVIRONMENTAL PRECAUTIONS: Prevent spills from entering storm sewers or drains and contact with soil.

PERSONAL PRECAUTIONS: See Section B

**7. HANDLING AND STORAGE**

HANDLING: High pressure injection poses the risk of injury due to the nature of pressurized lines. Always seek medical attention.

STORAGE: Do not store in open or unlabelled containers. Store away from strong oxidizing agents or combustible material.

**8. EXPOSURE CONTROLS/PERSONAL PROTECTION**

VEGETATION: No special requirements under ordinary conditions of use and with adequate ventilation.

RESPIRATORY PROTECTION: No special requirements under ordinary conditions of use and with adequate ventilation.

EYE PROTECTION: Normal industrial eye protection practices should be employed.

SKIN PROTECTION: No special equipment required. However, good personal hygiene practices should always be followed.

EXPOSURE LIMITS: This product does not contain any components which have recognized exposure limits. However, a exposure limit of 5.00 mg/m3 is suggested for oil mist.

**9. PHYSICAL AND CHEMICAL PROPERTIES**

Typical physical properties are given below. Consult Product Data Sheet

for specific details.

APPEARANCE: Liquid

COLOR: Amber

ODOR: Mild

ODOR THRESHOLD-ppm: NE

pH: NA

BOILING POINT C(F): > 316(600)

MELTING POINT C(F): NA

FLASH POINT C(F): > 204(399) (ASTM D-92)

FLAMMABILITY: NE

AUTO FLAMMABILITY: NE

EXPLOSIVE PROPERTIES: NA

OXIDIZING PROPERTIES: NA

VAPOR PRESSURE-mmHg 20 C: < 0.1

VAPOR DENSITY: > 2.0

EVAPORATION RATE: NE

RELATIVE DENSITY, 15/4 C: 0.89

SOLUBILITY IN WATER: Negligible

PARTICULAR COEFFICIENT: > 3.5

VISCOSITY AT 40 C, GM/5 GR/2

INFLUENCY AT 40 C, GM/5 GR/2

WATER CONTENT (%) 8 - 10, 12

FREEZING POINT (C/F) 10

VOLENTILE ORGANIC COMPOUNDS 10

FOR FURTHER TECHNICAL INFORMATION, CONTACT YOUR MARKETING REPRESENTATIVE

## 10. STABILITY AND REACTIVITY

STABILITY (THERMAL, LIGHT, ETC.): Stable.

CONDITIONS TO AVOID: Extreme heat.

INCOMPATIBILITY (MATERIALS TO AVOID): Strong oxidizers.

HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide, Metal oxides, Elemental oxides.

HAZARDOUS POLYMERIZATION: Will not occur.

## 11. TOXICOLOGICAL DATA

### --- ACUTE TOXICOLOGY ---

ORAL TOXICITY (RATS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.

DERMAL TOXICITY (RABBITS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.

INHALATION TOXICITY (RATS): Not applicable ---Harmful concentrations of mist and/or vapors are unlikely to be encountered through any customary or reasonably foreseeable handling, use, or misuse of this product.

EYE IRRITATION (RABBITS): Practically non-irritating. (Draize score: greater than 6 but 15 or less). ---Based on testing of similar products and/or the components.

SKIN IRRITATION (RABBITS): Practically non-irritating. (Primary Irritation Index: greater than 0.5 but less than 3). ---Based on testing of similar products and/or the components.

OTHER ACUTE TOXICITY DATA: The acute toxicological results summarized above are based on testing of representative Mobil products.

### --- SUBCHRONIC TOXICOLOGY (SUMMARY) ---

Representative Mobil formulations have been tested at the Mobil Environmental and Health Sciences Laboratory by dermal applications to rats 7 days/week for 90 days at doses significantly higher than those expected during normal industrial exposure. Extensive evaluations, including microscopic examination of internal organs and clinical chemistry of body fluids, showed no adverse effects.

### --- REPRODUCTIVE TOXICOLOGY (SUMMARY) ---

Dermal exposure of pregnant rats to representative formulations did not cause adverse effects in either the mothers or their offspring.

### --- CHRONIC TOXICOLOGY (SUMMARY) ---

The base oils in this product are severely solvent refined and/or severely hydrotreated. Chronic mouse skin painting studies of severely treated oils showed no evidence of carcinogenic effects. These results are confirmed on a continuing basis using various screening methods such as the Mouse Modified Ames Test and IP-346.

### --- GENOTOXICITY (SUMMARY) ---

representative Mobil Formulations have not shown any mutagenicity in Ames tests.

## 12. ECOLOGICAL INFORMATION

**ENVIRONMENTAL FATE AND EFFECTS:** This product is considered to be essentially biodegradable. There is no evidence to suggest bioaccumulation will occur. It is not expected to be toxic to aquatic organisms.

Volatilization of spillage may lead to penetration into surface and groundwater. However, there is no evidence that this would cause adverse ecological effects.

## 13. DISPOSAL CONSIDERATIONS

**WASTE DISPOSAL:** Product is suitable for burning in an enclosed, controlled burner for fuel value or disposal by coprocessed incineration. Such burning may be limited pursuant to the Resource Conservation and Recovery Act. In addition, the product is suitable for processing by an approved recycling facility or can be disposed of at an appropriate government waste disposal facility. One of these methods is subject to user compliance with applicable laws and regulations and consideration of product characteristics at time of disposal.

**RCRA INFORMATION:** The unused product, in our opinion, is not specifically listed by the EPA as a hazardous waste (40 CFR, Part 261.0), nor is it formulated to contain materials which are listed hazardous wastes. It does not exhibit the hazardous characteristics of ignitability, corrosivity, or reactivity and is not formulated with contaminants as determined by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.

## 14. TRANSPORT INFORMATION

DOT CODE: NOT REGULATED BY DOT CODE.

STB/ADRI: NOT REGULATED BY STB/ADRI.

IMO: NOT REGULATED BY IMO.

IATA: NOT REGULATED BY IATA.

## 15. REGULATORY INFORMATION

**Governmental Inventory Status:** All components comply with TSCA, EPCRA/CLPDCS, and DSL.

**EU Labeling:** EU Labeling not required.

**U.S. Superfund Amendments and Reauthorization Act (SARA) Title III:** This product contains no "EXTREMELY HAZARDOUS SUBSTANCES".

**SARA (311/312) REPORTABLE HAZARD CATEGORIES:** None.

This product contains no chemicals reportable under

SARA (313) toxic release program.

**THIS PRODUCT HAS BEEN AUTHORIZED BY UNDA FOR USE UNDER THE FOLLOWING CATEGORY:** R2 - Lubricants with No Food Contact.

The following product ingredients are cited on the lists below:

CHEMICAL NAME	CAS NUMBER	LIST CITATION
ZINC (ELEMENTAL ANALYSIS) (0.10%)	7440-66-6	22
PHOSPHOROTRICHOIC ACID, O,O-DI	68649-42-3	22
C11-14-ALKYL ESTERS, ZINC SALTS (2:1) (ZDDP) (0.67%)		

REGULATORY LISTS SEARCHED

OSHA 302, 302.6, 302.7, 302.8, 302.9, 302.10, 302.11, 302.12, 302.13, 302.14, 302.15, 302.16, 302.17, 302.18, 302.19, 302.20, 302.21, 302.22, 302.23, 302.24, 302.25, 302.26, 302.27, 302.28, 302.29, 302.30, 302.31, 302.32, 302.33, 302.34, 302.35, 302.36, 302.37, 302.38, 302.39, 302.40, 302.41, 302.42, 302.43, 302.44, 302.45, 302.46, 302.47, 302.48, 302.49, 302.50, 302.51, 302.52, 302.53, 302.54, 302.55, 302.56, 302.57, 302.58, 302.59, 302.60, 302.61, 302.62, 302.63, 302.64, 302.65, 302.66, 302.67, 302.68, 302.69, 302.70, 302.71, 302.72, 302.73, 302.74, 302.75, 302.76, 302.77, 302.78, 302.79, 302.80, 302.81, 302.82, 302.83, 302.84, 302.85, 302.86, 302.87, 302.88, 302.89, 302.90, 302.91, 302.92, 302.93, 302.94, 302.95, 302.96, 302.97, 302.98, 302.99, 303.00, 303.01, 303.02, 303.03, 303.04, 303.05, 303.06, 303.07, 303.08, 303.09, 303.10, 303.11, 303.12, 303.13, 303.14, 303.15, 303.16, 303.17, 303.18, 303.19, 303.20, 303.21, 303.22, 303.23, 303.24, 303.25, 303.26, 303.27, 303.28, 303.29, 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1. ACTION 41	2. LABEL 22	12. DATA 502	17. CA 904	22. MI 254
1. ACTION 42	2. LABEL 23	12. DATA 503	17. CA 905	22. MI 255
1. ACTION 43	2. LABEL 24	12. DATA 504	17. CA 906	22. MI 256
1. ACTION 44	2. LABEL 25	12. DATA 505	17. CA 907	22. MI 257
1. ACTION 45	2. LABEL 26	12. DATA 506	17. CA 908	22. MI 258

27. PI 11K

Note: ROW: DATA (Continued); NOT Suspended from service. (P) (S) (M) (D) (E) (F) (G) (H) (I) (J) (K) (L) (M) (N) (O) (P) (Q) (R) (S) (T) (U) (V) (W) (X) (Y) (Z) (AA) (AB) (AC) (AD) (AE) (AF) (AG) (AH) (AI) (AJ) (AK) (AL) (AM) (AN) (AO) (AP) (AQ) (AR) (AS) (AT) (AU) (AV) (AW) (AX) (AY) (AZ) (BA) (BB) (BC) (BD) (BE) (BF) (BG) (BH) (BI) (BJ) (BK) (BL) (BM) (BN) (BO) (BP) (BQ) (BR) (BS) (BT) (BU) (BV) (BW) (BX) (BY) (BZ) (CA) (CB) (CC) (CD) (CE) (CF) (CG) (CH) (CI) (CJ) (CK) (CL) (CM) (CN) (CO) (CP) (CQ) (CR) (CS) (CT) (CU) (CV) (CW) (CX) (CY) (CZ) (DA) (DB) (DC) (DD) (DE) (DF) (DG) (DH) (DI) (DJ) (DK) (DL) (DM) (DN) (DO) (DP) (DQ) (DR) (DS) (DT) (DU) (DV) (DW) (DX) (DY) (DZ) (EA) (EB) (EC) (ED) (EE) (EF) (EG) (EH) (EI) (EJ) (EK) (EL) (EM) (EN) (EO) (EP) (EQ) (ER) (ES) (ET) (EU) (EV) (EW) (EX) (EY) (EZ) (FA) (FB) (FC) (FD) (FE) (FF) (FG) (FH) (FI) (FJ) (FK) (FL) (FM) (FN) (FO) (FP) (FQ) (FR) (FS) (FT) (FU) (FV) (FW) (FX) (FY) (FZ) (GA) (GB) (GC) (GD) (GE) (GF) (GG) (GH) (GI) (GJ) (GK) (GL) (GM) (GN) (GO) (GP) (GQ) (GR) (GS) (GT) (GU) (GV) (GW) (GX) (GY) (GZ) (HA) (HB) (HC) (HD) (HE) (HF) (HG) (HH) (HI) (HJ) (HK) (HL) (HM) (HN) (HO) (HP) (HQ) (HR) (HS) (HT) (HU) (HV) (HW) (HX) (HY) (HZ) (IA) (IB) (IC) (ID) (IE) (IF) (IG) (IH) (II) (IJ) (IK) (IL) (IM) (IN) (IO) (IP) (IQ) (IR) (IS) (IT) (IU) (IV) (IW) (IX) (IY) (IZ) (JA) (JB) (JC) (JD) (JE) (JF) (JG) (JH) (JI) (JJ) (JK) (JL) (JM) (JN) (JO) (JP) (JQ) (JR) (JS) (JT) (JU) (JV) (JW) (JX) (JY) (JZ) (KA) (KB) (KC) (KD) (KE) (KF) (KG) (KH) (KI) (KJ) (KK) (KL) (KM) (KN) (KO) (KP) (KQ) (KR) (KS) (KT) (KU) (KV) (KW) (KX) (KY) (KZ) (LA) (LB) (LC) (LD) (LE) (LF) (LG) (LH) (LI) (LJ) (LK) (LL) (LM) (LN) (LO) (LP) (LQ) (LR) (LS) (LT) (LU) (LV) (LW) (LX) (LY) (LZ) (MA) (MB) (MC) (MD) (ME) (MF) (MG) (MH) (MI) (MJ) (MK) (ML) (MM) (MN) (MO) (MP) (MQ) (MR) (MS) (MT) (MU) (MV) (MW) (MX) (MY) (MZ) (NA) (NB) (NC) (ND) (NE) (NF) (NG) (NH) (NI) (NJ) (NK) (NL) (NM) (NO) (NP) (NQ) (NR) (NS) (NT) (NU) (NV) (NW) (NX) (NY) (NZ) (OA) (OB) (OC) (OD) (OE) (OF) (OG) (OH) (OI) (OJ) (OK) (OL) (OM) (ON) (OO) (OP) (OQ) (OR) (OS) (OT) (OU) (OV) (OW) (OX) (OY) (OZ) (PA) (PB) (PC) (PD) (PE) (PF) (PG) (PH) (PI) (PJ) (PK) (PL) (PM) (PN) (PO) (PP) (PQ) (PR) (PS) (PT) (PU) (PV) (PW) (PX) (PY) (PZ) (QA) (QB) (QC) (QD) (QE) (QF) (QG) (QH) (QI) (QJ) (QK) (QL) (QM) (QN) (QO) (QP) (QQ) (QR) (QS) (QT) (QU) (QV) (QW) (QX) (QY) (QZ) (RA) (RB) (RC) (RD) (RE) (RF) (RG) (RH) (RI) (RJ) (RK) (RL) (RM) (RN) (RO) (RP) (RQ) (RR) (RS) (RT) (RU) (RV) (RW) (RX) (RY) (RZ) (SA) (SB) (SC) (SD) (SE) (SF) (SG) (SH) (SI) (SJ) (SK) (SL) (SM) (SN) (SO) (SP) (SQ) (SR) (SS) (ST) (SU) (SV) (SW) (SX) (SY) (SZ) (TA) (TB) (TC) (TD) (TE) (TF) (TG) (TH) (TI) (TJ) (TK) (TL) (TM) (TN) (TO) (TP) (TQ) (TR) (TS) (TT) (TU) (TV) (TW) (TX) (TY) (TZ) (UA) (UB) (UC) (UD) (UE) (UF) (UG) (UH) (UI) (UJ) (UK) (UL) (UM) (UN) (UO) (UP) (UQ) (UR) (US) (UT) (UU) (UV) (UW) (UX) (UY) (UZ) (VA) (VB) (VC) (VD) (VE) (VF) (VG) (VH) (VI) (VJ) (VK) (VL) (VM) (VN) (VO) (VP) (VQ) (VR) (VS) (VT) (VU) (VV) (VW) (VX) (VY) (VZ) (WA) (WB) (WC) (WD) (WE) (WF) (WG) (WH) (WI) (WJ) (WK) (WL) (WM) (WN) (WO) (WP) (WQ) (WR) (WS) (WT) (WU) (WV) (WW) (WX) (WY) (WZ) (XA) (XB) (XC) (XD) (XE) (XF) (XG) (XH) (XI) (XJ) (XK) (XL) (XM) (XN) (XO) (XP) (XQ) (XR) (XS) (XT) (XU) (XV) (XW) (XX) (XY) (XZ) (YA) (YB) (YC) (YD) (YE) (YF) (YG) (YH) (YI) (YJ) (YK) (YL) (YM) (YN) (YO) (YP) (YQ) (YR) (YS) (YT) (YU) (YV) (YW) (YX) (YZ) (ZA) (ZB) (ZC) (ZD) (ZE) (ZF) (ZG) (ZH) (ZI) (ZJ) (ZK) (ZL) (ZM) (ZN) (ZO) (ZP) (ZQ) (ZR) (ZS) (ZT) (ZU) (ZV) (ZW) (ZX) (ZY) (ZZ)

NOTE: HYDRAULIC OIL

MOBIL MOBIL PRODUCTS ARE NOT FORMULATED TO CONTAIN PCBs. Please call the Customer Response Center at 800-662-4129 for information.

For Internal Use Only: MFC: 1272 NA 1-1, MPEP: A, ORN: 6/18/93, QIN: 4823, CMGON: 57319, REG: US - MARKETING, MARK USE: 1, MFL Approval Date: 2/21/93.

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**ATTACHMENT 2**

Photo Log



View looking east from the South 228<sup>th</sup> Street overpass at the northeast corner of the Site. Note the stormwater flow pattern to the east-southeast with a slight sheen on the asphalt pavement from typical parking lot runoff.



View looking south from the South 228<sup>th</sup> Street overpass showing the Manufacturing Building, release area, covered excavation, utility markings and drainage swale adjacent to the railroad main line.



View of the northeast corner of the Manufacturing Building. Note the slight sheen from typical parking lot runoff flowing towards the hydraulic oil release area from the upgradient asphalt paved area.



View looking south, note the slight sheen accumulation near the pavement edge downgradient of the hydraulic oil release area. This sheen is from typical parking lot runoff from an upgradient area.



View looking southeast of the asphalt pavement adjacent to the overhead door to the Baler area of the Manufacturing Building where the hydraulic oil was released.



View of the joint between the concrete walk and the asphalt pavement below the overhead door in the Baler area. Joint integrity is good. Note lack of staining. Soil boring SB206 collected at this location.



Sorbent socks placed at edge of gravel to capture any sheen on stormwater runoff from the asphalt pavement. White flags demark soil boring locations in center of and on four (4) sides of excavation.



View looking west at the overhead door in the Baler area. The white flags demark soil boring SB209 (foreground) and (left to right) soil borings SB208, SB206, and SB207.



View looking southeast from the excavation area at the drainage swale approximately 20-feet (centered) east of the excavation edge. No sheen observed.



**ATTACHMENT 3**

Soil Boring Logs

# SOIL BORING LOG



**PROJECT LOCATION:** Kent, WA  
**BORING LOCATION:** East side of excavation  
**JOB No:** 302.REX  
**GEOLOGIST:** J. Weakliem/M. DeGregory  
**TOTAL DEPTH:** 4'  
**BORING DIAMETER:** 2"  
**DATES DRILLED:** 12/29/11

**BORING ID:** SB201  
**CLIENT:** RBCC  
**SITE NAME:** REXAM - Kent  
**SITE ADDRESS:** 1220 N. 2nd Av.  
 Kent, WA  
**DRILLING CO.:** ESN Northwest  
**DRILLER:** Carlos Trujillo  
**RIG & BIT TYPE:** Geoprobe, 4' MacroCore  
**METHOD OF DRILLING:** Direct Push

**DEPTH TO WATER:** 3.5'

0

DEPTH (Feet)	DTW	SOIL SYMBOLS/ FIELD TEST DATA	Soil Description	Blows (per 6 inch)	PID (response units)	Samples	Comments
			SC: Dark brown wet clayey sand, soft.			SB201A	
			SP: Brown, moist gravelly fine sand, loose, some silt and clay. Gray clay pockets in lower 6 inches.	N/A	All background	SB201B	4' recovery
			CL: Dark gray, moist silty clay, soft. Wet at 3.5 feet.				Boring backfilled with bentonite, hydrated in lifts, topped with soil.
			End of boring at 4'.				

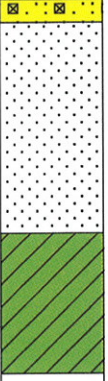


# SOIL BORING LOG

**PROJECT LOCATION:** Kent, WA  
**BORING LOCATION:** South side of excavation  
**JOB No:** 302.REX  
**GEOLOGIST:** J. Weakliem/M. DeGregory  
**TOTAL DEPTH:** 4'  
**BORING DIAMETER:** 2"  
**DATES DRILLED:** 12/29/11

**BORING ID:** SB202  
**CLIENT:** RBCC  
**SITE NAME:** REXAM - Kent  
**SITE ADDRESS:** 1220 N. 2nd Av.  
 Kent, WA  
**DRILLING CO.:** ESN Northwest  
**DRILLER:** Carlos Trujillo  
**RIG & BIT TYPE:** Geoprobe, 4' MacroCore  
**METHOD OF DRILLING:** Direct Push

**DEPTH TO WATER:** 3.5'

DEPTH (Feet)	DTW	SOIL SYMBOLS/ FIELD TEST DATA	Soil Description	Blows (per 6 inch)	PID (response units)	Samples	Comments
0			GP: Ballast.  SP: Brown, moist gravelly fine sand, loose, some silt and clay.	N/A	All background	SB202A	4' recovery
			CL: Dark gray, moist silty clay, soft. Wet at 3.5 feet.			SB202B	Boring backfilled with bentonite, hydrated in lifts, topped with gravel to match surface.
			End of boring at 4'.				

# SOIL BORING LOG



**PROJECT LOCATION:** Kent, WA  
**BORING LOCATION:** Center of excavation  
**JOB No:** 302.REX  
**GEOLOGIST:** J. Weakliem/M. DeGregory  
**TOTAL DEPTH:** 4'  
**BORING DIAMETER:** 2"  
**DATES DRILLED:** 12/29/11

**BORING ID:** SB-203  
**CLIENT:** RBCC  
**SITE NAME:** REXAM - Kent  
**SITE ADDRESS:** 1220 N. 2nd Av.  
 Kent, WA

**DRILLING CO.:** ESN Northwest  
**DRILLER:** Carlos Trujillo  
**RIG & BIT TYPE:** Geoprobe, 4' MacroCore  
**METHOD OF DRILLING:** Direct Push

**DEPTH TO WATER:** 3.5'

DEPTH (Feet)	DTW	SOIL SYMBOLS/ FIELD TEST DATA	Soil Description	Blows (per 6 inch)	PID (response units)	Samples	Comments
0			SC: Dark brown wet clayey sand, soft.			SB-203A	
			SP: Brown, moist gravelly fine sand, loose, some silt and clay. Grades into lower unit.	N/A	All background		4' recovery
			CL: Dark gray, moist silty clay, soft. Wet at 3.5 feet.			SB-203B	Boring backfilled with bentonite, hydrated in lifts, topped with soil.
			End of boring at 4'.				

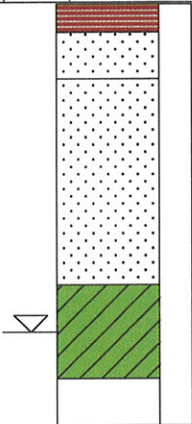
# SOIL BORING LOG



**PROJECT LOCATION:** Kent, WA  
**BORING LOCATION:** West side of excavation  
**JOB No:** 302.REX  
**GEOLOGIST:** J. Weakliem/M. DeGregory  
**TOTAL DEPTH:** 4'  
**BORING DIAMETER:** 2"  
**DATES DRILLED:** 12/29/11

**BORING ID:** SB204  
**CLIENT:** RBCC  
**SITE NAME:** REXAM - Kent  
**SITE ADDRESS:** 1220 N. 2nd Av.  
 Kent, WA  
**DRILLING CO.:** ESN Northwest  
**DRILLER:** Carlos Trujillo  
**RIG & BIT TYPE:** Geoprobe, 4' MacroCore  
**METHOD OF DRILLING:** Direct Push

**DEPTH TO WATER:** 3.5'

DEPTH (Feet)	DTW	SOIL SYMBOLS/ FIELD TEST DATA	Soil Description	Blows (per 6 inch)	PID (response units)	Samples	Comments
0			ASPHALT: Pavement. SP: Gray sand and angular gravel. Loose SP: Brown, moist gravelly fine sand, loose, some silt and clay. Grades into lower unit in bottom 6 inches. CL: Dark gray, moist silty clay, soft. Wet at 3.5 feet. End of boring at 4'.	N/A	All background	SB204A  SB204B	3' recovery  Boring backfilled with bentonite, hydrated in lifts, topped with blacktop patch.

# SOIL BORING LOG



**PROJECT LOCATION:** Kent, WA  
**BORING LOCATION:** North side of excavation  
**JOB No:** 302.REX  
**GEOLOGIST:** J. Weakliem/M. DeGregory  
**TOTAL DEPTH:** 4'  
**BORING DIAMETER:** 2"  
**DATES DRILLED:** 12/29/11

**BORING ID:** SB205  
**CLIENT:** RBCC  
**SITE NAME:** REXAM - Kent  
**SITE ADDRESS:** 1220 N. 2nd Av.  
 Kent, WA  
**DRILLING CO.:** ESN Northwest  
**DRILLER:** Carlos Trujillo  
**RIG & BIT TYPE:** Geoprobe, 4' MacroCore  
**METHOD OF DRILLING:** Direct Push

**DEPTH TO WATER:** 3.5'

DEPTH (Feet)	DTW	SOIL SYMBOLS/ FIELD TEST DATA	Soil Description	Blows (per 6 inch)	PID (response units)	Samples	Comments
0			SP: Gray sand and angular gravel  SP: Brown, moist gravelly fine sand, loose, some silt and clay. Wet zone at 2.5' with slightly coarser gravel.  CL: Dark gray, moist silty clay, soft. Wet at 3.5 feet.  End of boring at 4'.	N/A	All background	SB205A/DUP  SB205B	3.7' recovery  Boring backfilled with bentonite, hydrated in lifts, topped with gravel to match surface.



# SOIL BORING LOG

**PROJECT LOCATION:** Kent, WA  
**BORING LOCATION:** Building wall by overhead door  
**JOB No:** 302.REX  
**GEOLOGIST:** J. Weakliem/M. DeGregory  
**TOTAL DEPTH:** 4'  
**BORING DIAMETER:** 2"  
**DATES DRILLED:** 12/29/11

**BORING ID:** SB-206  
**CLIENT:** RBCC  
**SITE NAME:** REXAM - Kent  
**SITE ADDRESS:** 1220 N. 2nd Av.  
 Kent, WA  
**DRILLING CO.:** ESN Northwest  
**DRILLER:** Carlos Trujillo  
**RIG & BIT TYPE:** Geoprobe, 4' MacroCore  
**METHOD OF DRILLING:** Direct Push

**DEPTH TO WATER:** 3.5'

0

DEPTH (Feet)	DTW	SOIL SYMBOLS/ FIELD TEST DATA	Soil Description	Blows (per 6 inch)	PID (response units)	Samples	Comments
			ASPHALT: Pavement.				
			SP: Gray, gravelly fine sand.	N/A	Background	SB206A	4' recovery
			SP: Brown fine sand and angular gravel, wet. Septic odor at 1.5 to 2.0 feet. Gasoline odor at 2.0 to 2.5 feet.		17	SB206B	
					36	SB206C	
			CL: Dark gray, moist silty clay, soft. Wet at 3.5 feet. No odors.		5		Boring backfilled with bentonite, hydrated in lifts, topped with blacktop patch.
			End of boring at 4'.		5	SB206D	



# SOIL BORING LOG

**PROJECT LOCATION:** Kent, WA  
**BORING LOCATION:** Northeast corner of building  
**JOB No:** 302.REX  
**GEOLOGIST:** J. Weakliem/M. DeGregory  
**TOTAL DEPTH:** 4'  
**BORING DIAMETER:** 2"  
**DATES DRILLED:** 12/29/11

**BORING ID:** SB207  
**CLIENT:** RBCC  
**SITE NAME:** REXAM - Kent  
**SITE ADDRESS:** 1220 N. 2nd Av.  
 Kent, WA  
**DRILLING CO.:** ESN Northwest  
**DRILLER:** Carlos Trujillo  
**RIG & BIT TYPE:** Geoprobe, 4' MacroCore  
**METHOD OF DRILLING:** Direct Push

**DEPTH TO WATER:** 3.5'

DEPTH (Feet)	DTW	SOIL SYMBOLS/ FIELD TEST DATA	Soil Description	Blows (per 6 inch)	PID (response units)	Samples	Comments
0			ASPHALT: Pavement. SP: Gray sand and angular gravel. Loose SP: Brown, moist fine sand, loose (fill). Wet at 3.5'. End of boring at 4'.	N/A	All background	SB207A SB207B	4' recovery  Boring backfilled with bentonite, hydrated in lifts, topped with blacktop patch.

# SOIL BORING LOG



**PROJECT LOCATION:** Kent, WA  
**BORING LOCATION:** South of SB206  
**JOB No:** 302.REX  
**GEOLOGIST:** J. Weakliem/M. DeGregory  
**TOTAL DEPTH:** 4'  
**BORING DIAMETER:** 2"  
**DATES DRILLED:** 12/29/11

**BORING ID:** SB208  
**CLIENT:** RBCC  
**SITE NAME:** REXAM - Kent  
**SITE ADDRESS:** 1220 N. 2nd Av.  
 Kent, WA  
**DRILLING CO.:** ESN Northwest  
**DRILLER:** Carlos Trujillo  
**RIG & BIT TYPE:** Geoprobe, 4' MacroCore  
**METHOD OF DRILLING:** Direct Push

**DEPTH TO WATER:** 3.5'

DEPTH (Feet)	DTW	SOIL SYMBOLS/ FIELD TEST DATA	Soil Description	Blows (per 6 inch)	PID (response units)	Samples	Comments
0			ASPHALT: Pavement. SP: Gray sand and angular gravel. Loose SP: Brown, moist gravelly fine sand, loose, some silt and clay. Grades into lower unit in bottom 6 inches. CL: Dark gray, moist silty clay, soft. Wet at 3.5 feet. End of boring at 4'.	N/A	All background	SB208A SB208B	4' recovery  Boring backfilled with bentonite, hydrated in lifts, topped with blacktop patch.

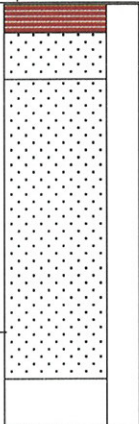
# SOIL BORING LOG



**PROJECT LOCATION:** Kent, WA  
**BORING LOCATION:** Between building and excavation  
**JOB No:** 302.REX  
**GEOLOGIST:** J. Weakliem/M. DeGregory  
**TOTAL DEPTH:** 4'  
**BORING DIAMETER:** 2"  
**DATES DRILLED:** 12/29/11

**BORING ID:** SB209  
**CLIENT:** RBCC  
**SITE NAME:** REXAM - Kent  
**SITE ADDRESS:** 1220 N. 2nd Av.  
 Kent, WA  
**DRILLING CO.:** ESN Northwest  
**DRILLER:** Carlos Trujillo  
**RIG & BIT TYPE:** Geoprobe, 4' MacroCore  
**METHOD OF DRILLING:** Direct Push

**DEPTH TO WATER:** 3.5'

DEPTH (Feet)	DTW	SOIL SYMBOLS/ FIELD TEST DATA	Soil Description	Blows (per 6 inch)	PID (response units)	Samples	Comments
0			ASPHALT: Pavement. SP: Gray sand and angular gravel. Loose SP: Brown, moist fine sand, loose (fill). Wet at 3.5'. End of boring at 4'.	N/A	All background	SB209A SB209B	4' recovery  Boring backfilled with bentonite, hydrated in lifts, topped with blacktop patch.



**ATTACHMENT 4**

Laboratory Deliverables Package

**ATTACHMENT 4**

Laboratory Deliverables Package

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D.  
Yelena Aravkina, M.S.  
Bradley T. Benson, B.S.  
Kurt Johnson, B.S.

3012 16th Avenue West  
Seattle, WA 98119-2029  
TEL: (206) 285-8282  
e-mail: fbi@isomedia.com

January 10, 2012

Mark Roman, Project Manager  
Envision Environmental, Inc.  
11 Sleepy Hollow Ct.  
Allentown, NJ 08501

Dear Mr. Roman:

Included are the results from the testing of material submitted on December 29, 2011 from the Rexam-Kent, WA 302.REX(A), F&BI 112394 project. There are 35 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

We appreciate this opportunity to be of service to you and hope you will call if you should have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.



Michael Erdahl  
Project Manager

Enclosures  
c: Mark DeGregory  
NAA0110R.DOC

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on December 29, 2011 by Friedman & Bruya, Inc. from the Envision Environmental Rexam-Kent, WA 302.REX(A), F&BI 112394 project. Samples were logged in under the laboratory ID's listed below.

<u>Laboratory ID</u>	<u>Envision Environmental</u>
112394-01	SB201A
112394-02	SB201B
112394-03	SB202A
112394-04	SB202B
112394-05	SB203A
112394-06	SB203B
112394-07	SB204A
112394-08	SB204B
112394-09	SB205A
112394-10	SB205B
112394-11	SB206A
112394-12	SB206B
112394-13	SB206C
112394-14	SB206D
112394-15	SB207A
112394-16	SB207B
112394-17	SB208A
112394-18	SB208B
112394-19	SB209A
112394-20	SB209B
112394-21	DUPLICATE
112394-22	FIELD BLANK

An 8270D internal standard failed the acceptance criteria for samples SB206B, SB207A, and SB206C due to matrix interferences. The sample was diluted and reanalyzed. The data were flagged accordingly.

Naphthalene in the 8270D water laboratory control sample duplicate exceeded the acceptance criteria. The analyte was not detected in the sample, therefore the data were acceptable.

All other quality control requirements were acceptable.

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 01/10/12

Date Received: 12/29/11

Project: Rexam-Kent, WA 302.REX(A), F&BI 112394

Date Extracted: 12/30/11 and 01/05/12

Date Analyzed: 12/30/11, 12/31/11, 01/03/12, and 01/05/12

**RESULTS FROM THE ANALYSIS OF SOIL SAMPLES  
FOR TOTAL PETROLEUM HYDROCARBONS AS  
DIESEL AND MOTOR OIL  
USING METHOD NWTPH-Dx**

Results Reported on a Dry Weight Basis

Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	<u>Diesel Range</u> (C <sub>10</sub> -C <sub>25</sub> )	<u>Motor Oil Range</u> (C <sub>25</sub> -C <sub>36</sub> )	<u>Surrogate</u> (% Recovery) (Limit 50-150)
SB201A 112394-01	<50	<250	120
SB202A 112394-03	<50	<250	120
SB203A 112394-05	<50	320	115
SB204A 112394-07	260 x	3,000	116
SB204B 112394-08	<50	<250	104
SB205A 112394-09	110 x	370	114
SB206A 112394-11	880 x	6,600	113
SB206B 112394-12	6,800	11,000	127
SB206C 112394-13	2,300	4,500	112
SB206D 112394-14	79 x	<250	127
SB207A 112394-15	2,000 x	5,900	115
SB207B 112394-16	<50	<250	116

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 01/10/12

Date Received: 12/29/11

Project: Rexam-Kent, WA 302.REX(A), F&BI 112394

Date Extracted: 12/30/11 and 01/05/12

Date Analyzed: 12/30/11, 12/31/11, 01/03/12, and 01/05/12

**RESULTS FROM THE ANALYSIS OF SOIL SAMPLES  
FOR TOTAL PETROLEUM HYDROCARBONS AS  
DIESEL AND MOTOR OIL  
USING METHOD NWTPH-Dx**

Results Reported on a Dry Weight Basis

Results Reported as mg/kg (ppm)

<u>Sample ID</u> Laboratory ID	<u>Diesel Range</u> (C <sub>10</sub> -C <sub>25</sub> )	<u>Motor Oil Range</u> (C <sub>25</sub> -C <sub>36</sub> )	<u>Surrogate</u> (% Recovery) (Limit 50-150)
SB208A 112394-17	<50	<250	116
SB208B 112394-18	<50	<250	119
SB209A 112394-19	<50	<250	120
SB209B 112394-20	<50	<250	117
DUPLICATE 112394-21	<50	<250	118
Method Blank 01-2303 MB	<50	<250	113
Method Blank 02-015 MB2	<50	<250	105

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 01/10/12

Date Received: 12/29/11

Project: Rexam-Kent, WA 302.REX(A), F&BI 112394

Date Extracted: 12/29/11

Date Analyzed: 12/30/11

**RESULTS FROM THE ANALYSIS OF WATER SAMPLES  
FOR TOTAL PETROLEUM HYDROCARBONS AS**

**DIESEL AND MOTOR OIL  
USING METHOD NWTPH-Dx**

Results Reported as ug/L (ppb)

<u>Sample ID</u> Laboratory ID	<u>Diesel Range</u> (C <sub>10</sub> -C <sub>25</sub> )	<u>Motor Oil Range</u> (C <sub>25</sub> -C <sub>36</sub> )	<u>Surrogate</u> (% Recovery) (Limit 47-140)
FIELD BLANK 112394-22	<50	<250	82
Method Blank 01-2308 MB	<50	<250	83

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB201A	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-01 1/5
Date Analyzed:	01/04/12	Data File:	010425.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	93	50	150
Benzo(a)anthracene-d12	94	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	0.010
Anthracene	<0.01
Fluoranthene	0.027
Pyrene	0.025
Benz(a)anthracene	0.013
Chrysene	0.018
Benzo(a)pyrene	0.015
Benzo(b)fluoranthene	0.023
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	0.012
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	0.012

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB202A	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-03 1/5
Date Analyzed:	01/06/12	Data File:	010537.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	104	50	150
Benzo(a)anthracene-d12	108	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	0.010
Benz(a)anthracene	<0.01
Chrysene	0.022
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	0.012

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB203A	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-05 1/5
Date Analyzed:	01/04/12	Data File:	010427.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	95	50	150
Benzo(a)anthracene-d12	112	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID: SB204A	Client: Envision Environmental
Date Received: 12/29/11	Project: Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted: 12/30/11	Lab ID: 112394-07 1/5
Date Analyzed: 01/06/12	Data File: 010534.D
Matrix: Soil	Instrument: GCMS6
Units: mg/kg (ppm)	Operator: YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	91	50	150
Benzo(a)anthracene-d12	117	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID: SB204B	Client: Envision Environmental
Date Received: 12/29/11	Project: Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted: 01/05/12	Lab ID: 112394-08 1/5
Date Analyzed: 01/09/12	Data File: 010910.D
Matrix: Soil	Instrument: GCMS6
Units: mg/kg (ppm)	Operator: YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	93	50	150
Benzo(a)anthracene-d12	94	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB205A	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-09 1/5
Date Analyzed:	01/04/12	Data File:	010428.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	95	50	150
Benzo(a)anthracene-d12	106	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB206A	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-11 1/50
Date Analyzed:	01/06/12	Data File:	010622.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	88	50	150
Benzo(a)anthracene-d12	290 ds	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.1
Acenaphthylene	<0.1
Acenaphthene	<0.1
Fluorene	<0.1
Phenanthrene	<0.1
Anthracene	<0.1
Fluoranthene	<0.1
Pyrene	<0.1
Benzo(a)anthracene	<0.1
Chrysene	<0.1
Benzo(a)pyrene	0.15
Benzo(b)fluoranthene	<0.1
Benzo(k)fluoranthene	<0.1
Indeno(1,2,3-cd)pyrene	<0.1
Dibenz(a,h)anthracene	<0.1
Benzo(g,h,i)perylene	0.12

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID: SB206B	Client: Envision Environmental
Date Received: 12/29/11	Project: Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted: 12/30/11	Lab ID: 112394-12 1/50
Date Analyzed: 01/06/12	Data File: 010621.D
Matrix: Soil	Instrument: GCMS6
Units: mg/kg (ppm)	Operator: YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	66	50	150
Benzo(a)anthracene-d12	63	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	0.47
Acenaphthylene	0.60
Acenaphthene	<0.1
Fluorene	<0.1
Phenanthrene	<0.1
Anthracene	<0.1
Fluoranthene	<0.1
Pyrene	0.28
Benz(a)anthracene	<0.1
Chrysene	0.23
Benzo(a)pyrene	<0.1 J
Benzo(b)fluoranthene	<0.1 J
Benzo(k)fluoranthene	<0.1 J
Indeno(1,2,3-cd)pyrene	<0.1 J
Dibenz(a,h)anthracene	<0.1 J
Benzo(g,h,i)perylene	<0.1 J

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB206B	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-12 1/250
Date Analyzed:	01/06/12	Data File:	010535.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower	Upper
Anthracene-d10	23 ds	Limit:	Limit:
Benzo(a)anthracene-d12	222 ds	50	150
		35	159

Compounds:	Concentration
	mg/kg (ppm)
Naphthalene	<0.5
Acenaphthylene	<0.5
Acenaphthene	<0.5
Fluorene	<0.5
Phenanthrene	<0.5
Anthracene	<0.5
Fluoranthene	<0.5
Pyrene	<0.5
Benz(a)anthracene	<0.5
Chrysene	<0.5
Benzo(a)pyrene	<0.5
Benzo(b)fluoranthene	<0.5
Benzo(k)fluoranthene	<0.5
Indeno(1,2,3-cd)pyrene	<0.5
Dibenz(a,h)anthracene	<0.5
Benzo(g,h,i)perylene	<0.5

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB206C	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-13 1/5
Date Analyzed:	01/04/12	Data File:	010429.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower	Upper
Anthracene-d10	96	Limit:	Limit:
Benzo(a)anthracene-d12	199 J vo	50	150
		35	159

Compounds:	Concentration
	mg/kg (ppm)
Naphthalene	1.2
Acenaphthylene	<0.01
Acenaphthene	0.035
Fluorene	0.065
Phenanthrene	0.21
Anthracene	<0.01
Fluoranthene	0.015
Pyrene	0.13 J
Benz(a)anthracene	0.011 J
Chrysene	0.061 J
Benzo(a)pyrene	<0.01 J
Benzo(b)fluoranthene	<0.01 J
Benzo(k)fluoranthene	<0.01 J
Indeno(1,2,3-cd)pyrene	<0.01 J
Dibenz(a,h)anthracene	<0.01 J
Benzo(g,h,i)perylene	<0.01 J

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB206C	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-13 1/50
Date Analyzed:	01/05/12	Data File:	010524.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	63	50	150
Benzo(a)anthracene-d12	99	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	1.2
Acenaphthylene	0.13
Acenaphthene	<0.1
Fluorene	<0.1
Phenanthrene	0.23
Anthracene	<0.1
Fluoranthene	<0.1
Pyrene	<0.1
Benz(a)anthracene	<0.1
Chrysene	<0.1
Benzo(a)pyrene	<0.1
Benzo(b)fluoranthene	<0.1
Benzo(k)fluoranthene	<0.1
Indeno(1,2,3-cd)pyrene	<0.1
Dibenz(a,h)anthracene	<0.1
Benzo(g,h,i)perylene	<0.1

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID: SB206D	Client: Envision Environmental
Date Received: 12/29/11	Project: Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted: 12/30/11	Lab ID: 112394-14 1/5
Date Analyzed: 01/04/12	Data File: 010430.D
Matrix: Soil	Instrument: GCMS6
Units: mg/kg (ppm)	Operator: YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	97	50	150
Benzo(a)anthracene-d12	109	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	0.018
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB207A	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-15 1/5
Date Analyzed:	01/04/12	Data File:	010431.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	96	50	150
Benzo(a)anthracene-d12	177 J vo	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	0.019 J
Benz(a)anthracene	0.012 J
Chrysene	0.016 J
Benzo(a)pyrene	<0.01 J
Benzo(b)fluoranthene	<0.01 J
Benzo(k)fluoranthene	<0.01 J
Indeno(1,2,3-cd)pyrene	0.015 J
Dibenz(a,h)anthracene	<0.01 J
Benzo(g,h,i)perylene	0.020 J

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID: SB207A	Client: Envision Environmental
Date Received: 12/29/11	Project: Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted: 12/30/11	Lab ID: 112394-15 1/50
Date Analyzed: 01/05/12	Data File: 010525.D
Matrix: Soil	Instrument: GCMS6
Units: mg/kg (ppm)	Operator: YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	90	50	150
Benzo(a)anthracene-d12	100	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.1
Acenaphthylene	<0.1
Acenaphthene	<0.1
Fluorene	<0.1
Phenanthrene	<0.1
Anthracene	<0.1
Fluoranthene	<0.1
Pyrene	<0.1
Benz(a)anthracene	<0.1
Chrysene	<0.1
Benzo(a)pyrene	<0.1
Benzo(b)fluoranthene	<0.1
Benzo(k)fluoranthene	<0.1
Indeno(1,2,3-cd)pyrene	<0.1
Dibenz(a,h)anthracene	<0.1
Benzo(g,h,i)perylene	<0.1

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB207B	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-16 1/5
Date Analyzed:	01/04/12	Data File:	010432.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	97	50	150
Benzo(a)anthracene-d12	101	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	0.038
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID: SB208A	Client: Envision Environmental
Date Received: 12/29/11	Project: Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted: 12/30/11	Lab ID: 112394-17 1/5
Date Analyzed: 01/04/12	Data File: 010433.D
Matrix: Soil	Instrument: GCMS6
Units: mg/kg (ppm)	Operator: YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	95	50	150
Benzo(a)anthracene-d12	100	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB208B	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-18 1/5
Date Analyzed:	01/05/12	Data File:	010434.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	96	50	150
Benzo(a)anthracene-d12	95	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID: SB209A	Client: Envision Environmental
Date Received: 12/29/11	Project: Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted: 12/30/11	Lab ID: 112394-19 1/5
Date Analyzed: 01/05/12	Data File: 010435.D
Matrix: Soil	Instrument: GCMS6
Units: mg/kg (ppm)	Operator: YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	96	50	150
Benzo(a)anthracene-d12	96	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	SB209B	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-20 1/5
Date Analyzed:	01/05/12	Data File:	010522.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	94	50	150
Benzo(a)anthracene-d12	93	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	DUPLICATE	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	112394-21 1/5
Date Analyzed:	01/05/12	Data File:	010523.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	95	50	150
Benzo(a)anthracene-d12	96	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	Method Blank	Client:	Envision Environmental
Date Received:	NA	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	01/05/12	Lab ID:	02-0020 mb 1/5
Date Analyzed:	01/05/12	Data File:	010518.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	103	50	150
Benzo(a)anthracene-d12	98	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	Method Blank	Client:	Envision Environmental
Date Received:	NA	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	12/30/11	Lab ID:	01-2311 mb 1/5
Date Analyzed:	01/04/12	Data File:	010424.D
Matrix:	Soil	Instrument:	GCMS6
Units:	mg/kg (ppm)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	88	50	150
Benzo(a)anthracene-d12	91	35	159

Compounds:	Concentration mg/kg (ppm)
Naphthalene	<0.01
Acenaphthylene	<0.01
Acenaphthene	<0.01
Fluorene	<0.01
Phenanthrene	<0.01
Anthracene	<0.01
Fluoranthene	<0.01
Pyrene	<0.01
Benz(a)anthracene	<0.01
Chrysene	<0.01
Benzo(a)pyrene	<0.01
Benzo(b)fluoranthene	<0.01
Benzo(k)fluoranthene	<0.01
Indeno(1,2,3-cd)pyrene	<0.01
Dibenz(a,h)anthracene	<0.01
Benzo(g,h,i)perylene	<0.01

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	FIELD BLANK	Client:	Envision Environmental
Date Received:	12/29/11	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	01/03/12	Lab ID:	112394-22
Date Analyzed:	01/04/12	Data File:	010423.D
Matrix:	Water	Instrument:	GCMS6
Units:	ug/L (ppb)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	96	50	150
Benzo(a)anthracene-d12	89	50	129

Compounds:	Concentration ug/L (ppb)
Naphthalene	<0.1
Acenaphthylene	<0.1
Acenaphthene	<0.1
Fluorene	<0.1
Phenanthrene	<0.1
Anthracene	<0.1
Fluoranthene	<0.1
Pyrene	<0.1
Benz(a)anthracene	<0.1
Chrysene	<0.1
Benzo(a)pyrene	<0.1
Benzo(b)fluoranthene	<0.1
Benzo(k)fluoranthene	<0.1
Indeno(1,2,3-cd)pyrene	<0.1
Dibenz(a,h)anthracene	<0.1
Benzo(g,h,i)perylene	<0.1

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Semivolatile Compounds By EPA Method 8270D SIM

Client Sample ID:	Method Blank	Client:	Envision Environmental
Date Received:	NA	Project:	Rexam-Kent, WA 302.REX(A), F&BI 112394
Date Extracted:	01/03/12	Lab ID:	02-0004 mb
Date Analyzed:	01/04/12	Data File:	010421.D
Matrix:	Water	Instrument:	GCMS6
Units:	ug/L (ppb)	Operator:	YA

Surrogates:	% Recovery:	Lower Limit:	Upper Limit:
Anthracene-d10	94	50	150
Benzo(a)anthracene-d12	92	50	129

Compounds:	Concentration ug/L (ppb)
Naphthalene	<0.1
Acenaphthylene	<0.1
Acenaphthene	<0.1
Fluorene	<0.1
Phenanthrene	<0.1
Anthracene	<0.1
Fluoranthene	<0.1
Pyrene	<0.1
Benz(a)anthracene	<0.1
Chrysene	<0.1
Benzo(a)pyrene	<0.1
Benzo(b)fluoranthene	<0.1
Benzo(k)fluoranthene	<0.1
Indeno(1,2,3-cd)pyrene	<0.1
Dibenz(a,h)anthracene	<0.1
Benzo(g,h,i)perylene	<0.1

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 01/10/12

Date Received: 12/29/11

Project: Rexam-Kent, WA 302.REX(A), F&BI 112394

**QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES  
FOR TOTAL PETROLEUM HYDROCARBONS AS  
DIESEL EXTENDED USING METHOD NWTPH-Dx**

Laboratory Code: 112394-01 (Matrix Spike)

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	103	104	63-146	1

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Diesel Extended	mg/kg (ppm)	5,000	98	79-144

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 01/10/12

Date Received: 12/29/11

Project: Rexam-Kent, WA 302.REX(A), F&BI 112394

**QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES  
FOR TOTAL PETROLEUM HYDROCARBONS AS  
DIESEL EXTENDED USING METHOD NWTPH-Dx**

Laboratory Code: 201008-01 (Matrix Spike)

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Percent Recovery MSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	mg/kg (ppm)	5,000	<50	104	101	63-146	3

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Acceptance Criteria
Diesel Extended	mg/kg (ppm)	5,000	105	79-144

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 01/10/12

Date Received: 12/29/11

Project: Rexam-Kent, WA 302.REX(A), F&BI 112394

**QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER  
SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS  
DIESEL EXTENDED USING METHOD NWTPH-Dx**

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Diesel Extended	ug/L (ppb)	2,500	87	92	61-133	6

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 01/10/12

Date Received: 12/29/11

Project: Rexam-Kent, WA 302.REX(A), F&BI 112394

**QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL  
SAMPLES FOR PNA'S BY EPA METHOD 8270D SIM**

Laboratory Code: 112394-01 1/5 (Matrix Spike)

Analyte	Reporting Units	Spike Level	Sample Result	Percent Recovery MS	Acceptance Criteria
Naphthalene	mg/kg (ppm)	0.17	<0.01	96	44-129
Acenaphthylene	mg/kg (ppm)	0.17	<0.01	97	52-121
Acenaphthene	mg/kg (ppm)	0.17	<0.01	98	51-123
Fluorene	mg/kg (ppm)	0.17	<0.01	98	37-137
Phenanthrene	mg/kg (ppm)	0.17	0.010	104	45-124
Anthracene	mg/kg (ppm)	0.17	<0.01	98	32-124
Fluoranthene	mg/kg (ppm)	0.17	0.027	106	50-125
Pyrene	mg/kg (ppm)	0.17	0.025	114	41-135
Benz(a)anthracene	mg/kg (ppm)	0.17	0.013	96	23-144
Chrysene	mg/kg (ppm)	0.17	0.018	104	45-122
Benzo(b)fluoranthene	mg/kg (ppm)	0.17	0.023	101	31-144
Benzo(k)fluoranthene	mg/kg (ppm)	0.17	<0.01	99	45-130
Benzo(a)pyrene	mg/kg (ppm)	0.17	0.015	99	39-128
Indeno(1,2,3-cd)pyrene	mg/kg (ppm)	0.17	0.012	96	28-146
Dibenz(a,h)anthracene	mg/kg (ppm)	0.17	<0.01	100	46-129
Benzo(g,h,i)perylene	mg/kg (ppm)	0.17	0.012	92	37-133

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Naphthalene	mg/kg (ppm)	0.17	98	99	61-115	1
Acenaphthylene	mg/kg (ppm)	0.17	97	98	63-110	1
Acenaphthene	mg/kg (ppm)	0.17	99	101	60-115	2
Fluorene	mg/kg (ppm)	0.17	96	99	59-116	3
Phenanthrene	mg/kg (ppm)	0.17	98	98	60-113	0
Anthracene	mg/kg (ppm)	0.17	89	89	56-103	0
Fluoranthene	mg/kg (ppm)	0.17	95	96	60-116	1
Pyrene	mg/kg (ppm)	0.17	99	99	60-116	0
Benz(a)anthracene	mg/kg (ppm)	0.17	87	90	53-109	3
Chrysene	mg/kg (ppm)	0.17	98	99	61-116	1
Benzo(b)fluoranthene	mg/kg (ppm)	0.17	95	98	57-118	3
Benzo(k)fluoranthene	mg/kg (ppm)	0.17	94	97	61-118	3
Benzo(a)pyrene	mg/kg (ppm)	0.17	81	82	53-108	1
Indeno(1,2,3-cd)pyrene	mg/kg (ppm)	0.17	95	94	46-127	1
Dibenz(a,h)anthracene	mg/kg (ppm)	0.17	101	96	55-121	5
Benzo(g,h,i)perylene	mg/kg (ppm)	0.17	96	94	56-118	2

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 01/10/12

Date Received: 12/29/11

Project: Rexam-Kent, WA 302.REX(A), F&BI 112394

**QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL  
SAMPLES FOR PNA'S BY EPA METHOD 8270D SIM**

Laboratory Code: 201011-01 1/250 (Duplicate)

Analyte	Reporting Units	Sample Result	Duplicate Result	Relative Percent Difference (Limit 20)
Naphthalene	mg/kg (ppm)	4.2	4.1	2
Acenaphthylene	mg/kg (ppm)	<0.5	<0.5	nm
Acenaphthene	mg/kg (ppm)	<0.5	<0.5	nm
Fluorene	mg/kg (ppm)	1.8	1.8	0
Phenanthrene	mg/kg (ppm)	4.5	4.3	5
Anthracene	mg/kg (ppm)	<0.5	4.4	nm
Fluoranthene	mg/kg (ppm)	<0.5	<0.5	nm
Pyrene	mg/kg (ppm)	<0.5	<0.5	nm
Benz(a)anthracene	mg/kg (ppm)	<0.5	<0.5	nm
Chrysene	mg/kg (ppm)	<0.5	<0.5	nm
Benzo(b)fluoranthene	mg/kg (ppm)	<0.5	<0.5	nm
Benzo(k)fluoranthene	mg/kg (ppm)	<0.5	<0.5	nm
Benzo(a)pyrene	mg/kg (ppm)	<0.5	<0.5	nm
Indeno(1,2,3-cd)pyrene	mg/kg (ppm)	<0.5	<0.5	nm
Dibenz(a,h)anthracene	mg/kg (ppm)	<0.5	<0.5	nm
Benzo(g,h,i)perylene	mg/kg (ppm)	<0.5	<0.5	nm

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Naphthalene	mg/kg (ppm)	0.17	102	104	61-115	2
Acenaphthylene	mg/kg (ppm)	0.17	99	97	63-110	2
Acenaphthene	mg/kg (ppm)	0.17	101	100	60-115	1
Fluorene	mg/kg (ppm)	0.17	99	100	59-116	1
Phenanthrene	mg/kg (ppm)	0.17	101	100	60-113	1
Anthracene	mg/kg (ppm)	0.17	95	93	56-103	2
Fluoranthene	mg/kg (ppm)	0.17	96	99	60-116	3
Pyrene	mg/kg (ppm)	0.17	94	93	60-116	1
Benz(a)anthracene	mg/kg (ppm)	0.17	89	90	53-109	1
Chrysene	mg/kg (ppm)	0.17	99	98	61-116	1
Benzo(b)fluoranthene	mg/kg (ppm)	0.17	94	94	57-118	0
Benzo(k)fluoranthene	mg/kg (ppm)	0.17	99	100	61-118	1
Benzo(a)pyrene	mg/kg (ppm)	0.17	89	86	53-108	3
Indeno(1,2,3-cd)pyrene	mg/kg (ppm)	0.17	100	96	46-127	4
Dibenz(a,h)anthracene	mg/kg (ppm)	0.17	117	109	55-121	7
Benzo(g,h,i)perylene	mg/kg (ppm)	0.17	103	98	56-118	5

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Date of Report: 01/10/12

Date Received: 12/29/11

Project: Rexam-Kent, WA 302.REX(A), F&BI 112394

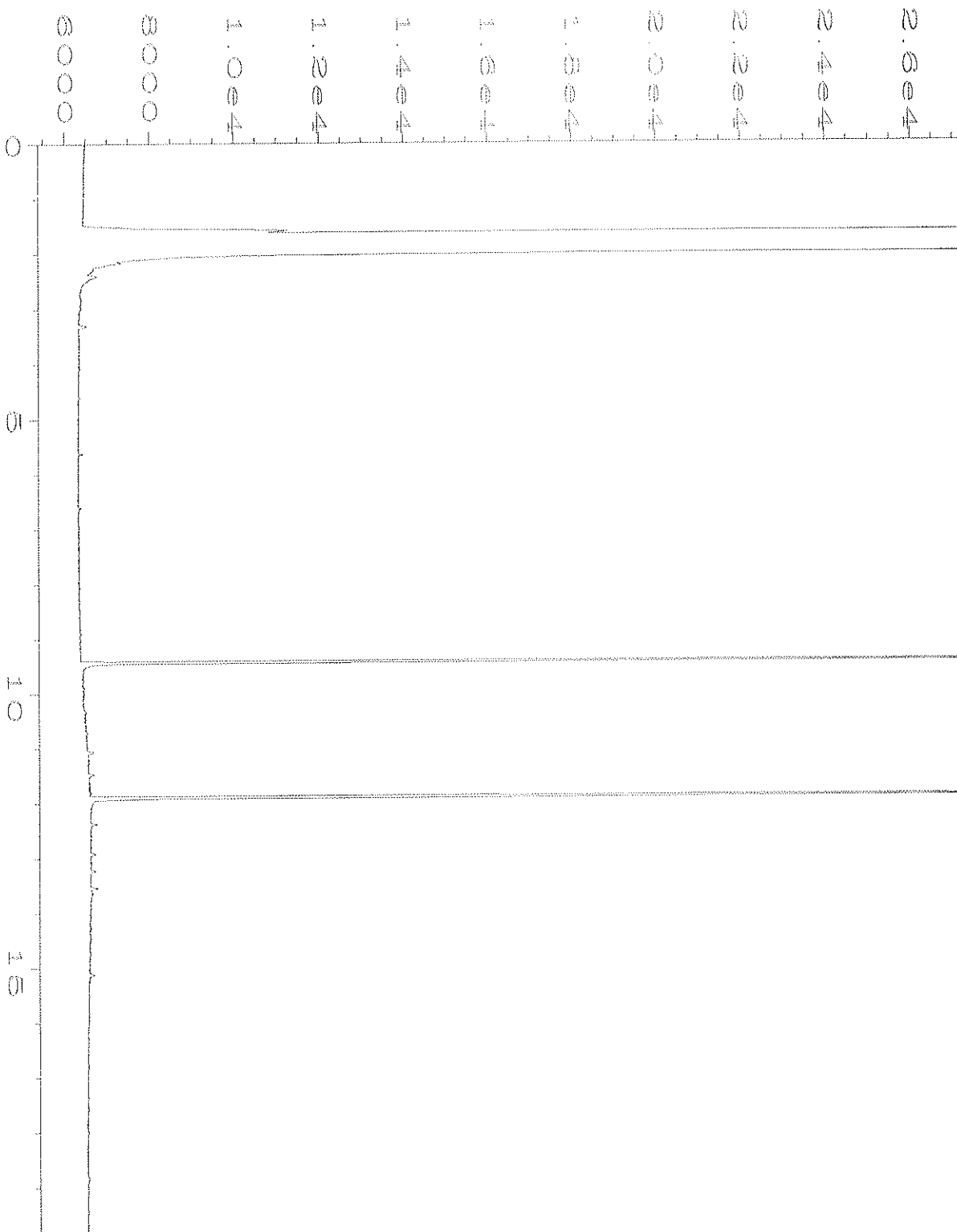
**QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER  
SAMPLES FOR PNA'S BY EPA METHOD 8270D SIM**

Laboratory Code: Laboratory Control Sample

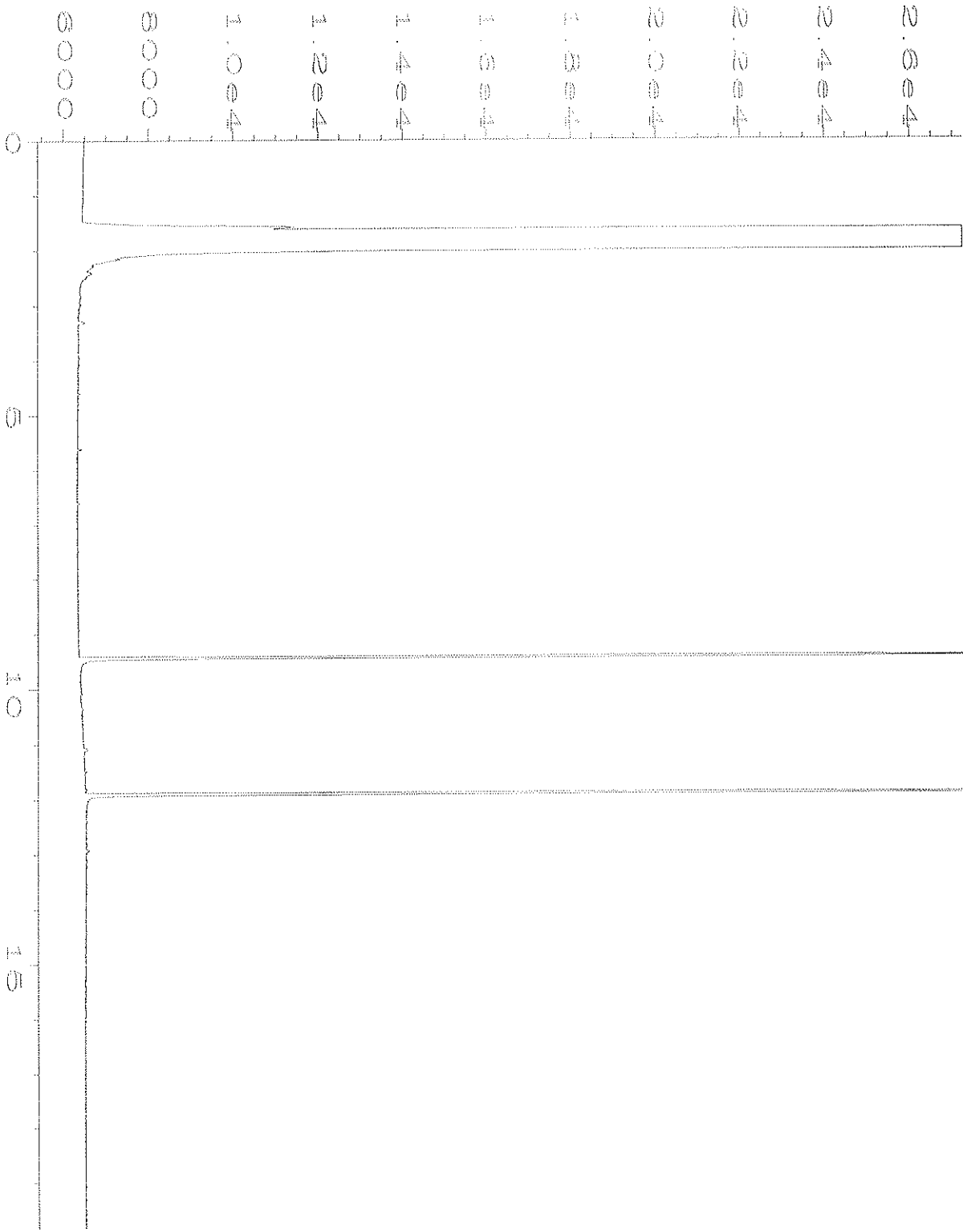
Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Naphthalene	ug/L (ppb)	1	95	102 vo	64-100	7
Acenaphthylene	ug/L (ppb)	1	93	93	67-104	0
Acenaphthene	ug/L (ppb)	1	94	95	65-103	1
Fluorene	ug/L (ppb)	1	93	93	64-106	0
Phenanthrene	ug/L (ppb)	1	94	94	66-106	0
Anthracene	ug/L (ppb)	1	91	92	67-112	1
Fluoranthene	ug/L (ppb)	1	92	91	69-116	1
Pyrene	ug/L (ppb)	1	97	94	68-115	3
Benz(a)anthracene	ug/L (ppb)	1	86	85	59-100	1
Chrysene	ug/L (ppb)	1	94	93	66-103	1
Benzo(b)fluoranthene	ug/L (ppb)	1	93	89	59-114	4
Benzo(k)fluoranthene	ug/L (ppb)	1	88	95	55-111	8
Benzo(a)pyrene	ug/L (ppb)	1	86	88	54-111	2
Indeno(1,2,3-cd)pyrene	ug/L (ppb)	1	86	88	35-124	2
Dibenz(a,h)anthracene	ug/L (ppb)	1	88	91	35-116	3
Benzo(g,h,i)perylene	ug/L (ppb)	1	88	89	39-114	1

**Data Qualifiers & Definitions**

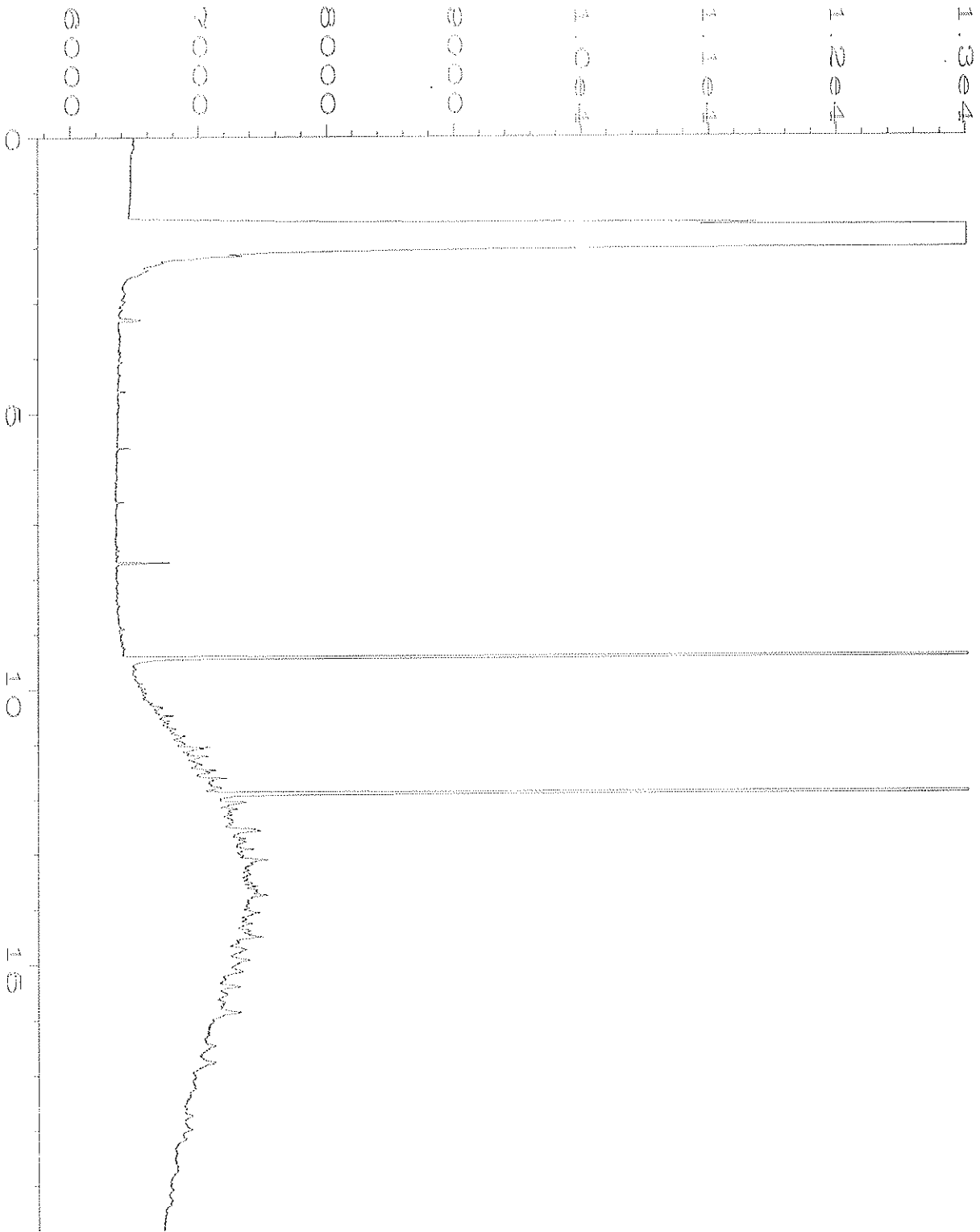
- a - The analyte was detected at a level less than five times the reporting limit. The RPD results may not provide reliable information on the variability of the analysis.
- A1 - More than one compound of similar molecule structure was identified with equal probability.
- b - The analyte was spiked at a level that was less than five times that present in the sample. Matrix spike recoveries may not be meaningful.
- ca - The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.
- c - The presence of the analyte indicated may be due to carryover from previous sample injections.
- d - The sample was diluted. Detection limits may be raised due to dilution.
- ds - The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.
- dv - Insufficient sample was available to achieve normal reporting limits and limits are raised accordingly.
- fb - Analyte present in the blank and the sample.
- fc - The compound is a common laboratory and field contaminant.
- hr - The sample and duplicate were reextracted and reanalyzed. RPD results were still outside of control limits. The variability is attributed to sample inhomogeneity.
- ht - Analysis performed outside the method or client-specified holding time requirement.
- ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.
- j - The result is below normal reporting limits. The value reported is an estimate.
- J - The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.
- jl - The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.
- jr - The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.
- js - The surrogate associated with the analyte is out of control limits. The reported concentration should be considered an estimate.
- lc - The presence of the compound indicated is likely due to laboratory contamination.
- L - The reported concentration was generated from a library search.
- nm - The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.
- pc - The sample was received in a container not approved by the method. The value reported should be considered an estimate.
- pr - The sample was received with incorrect preservation. The value reported should be considered an estimate.
- ve - Estimated concentration calculated for an analyte response above the valid instrument calibration range. A dilution is required to obtain an accurate quantification of the analyte.
- vo - The value reported fell outside the control limits established for this analyte.
- x - The sample chromatographic pattern does not resemble the fuel standard used for quantitation.



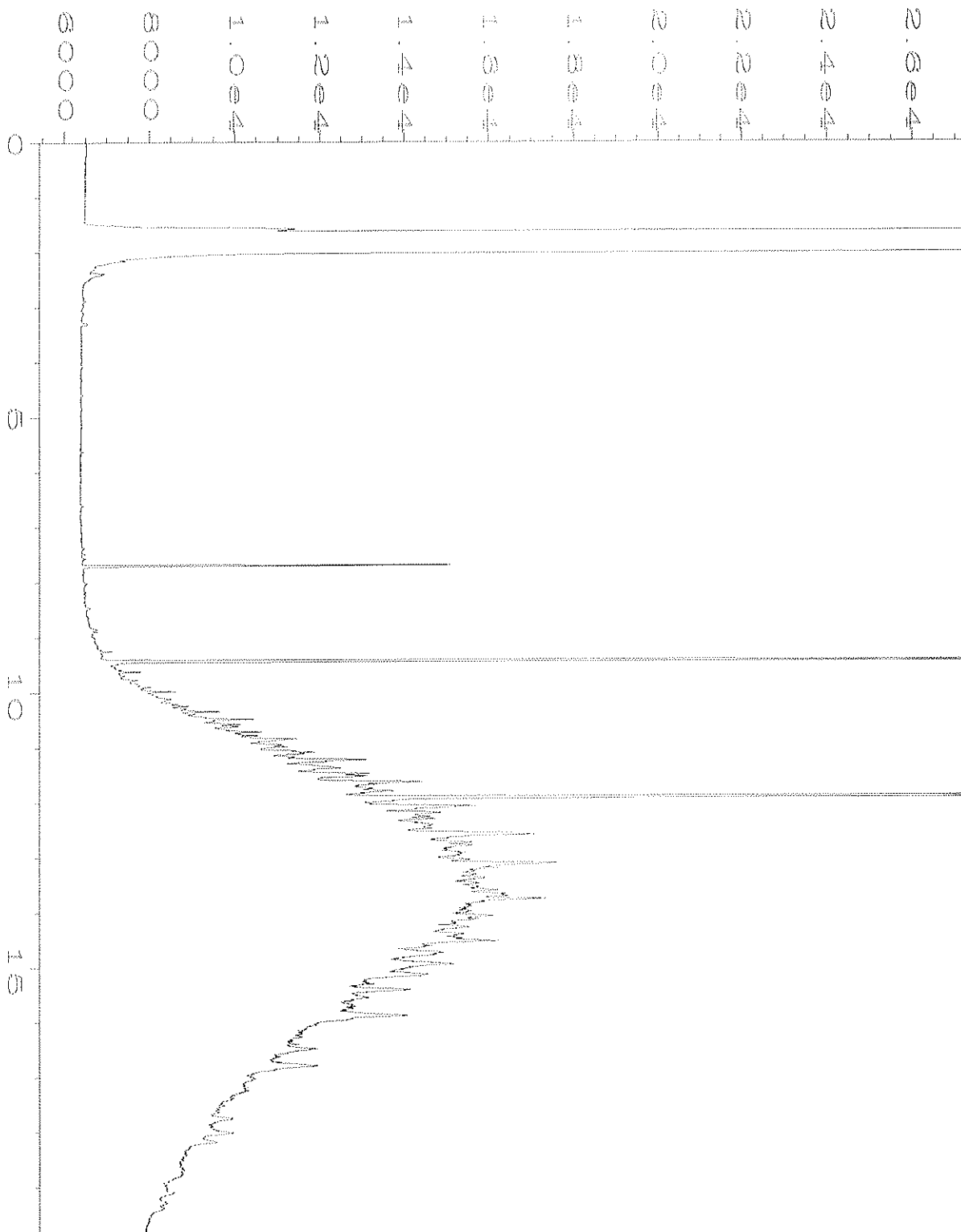
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Operator	: ML	Vial Number	: 15
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-01	Sequence Line	: 7
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 05:58 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:04 AM		



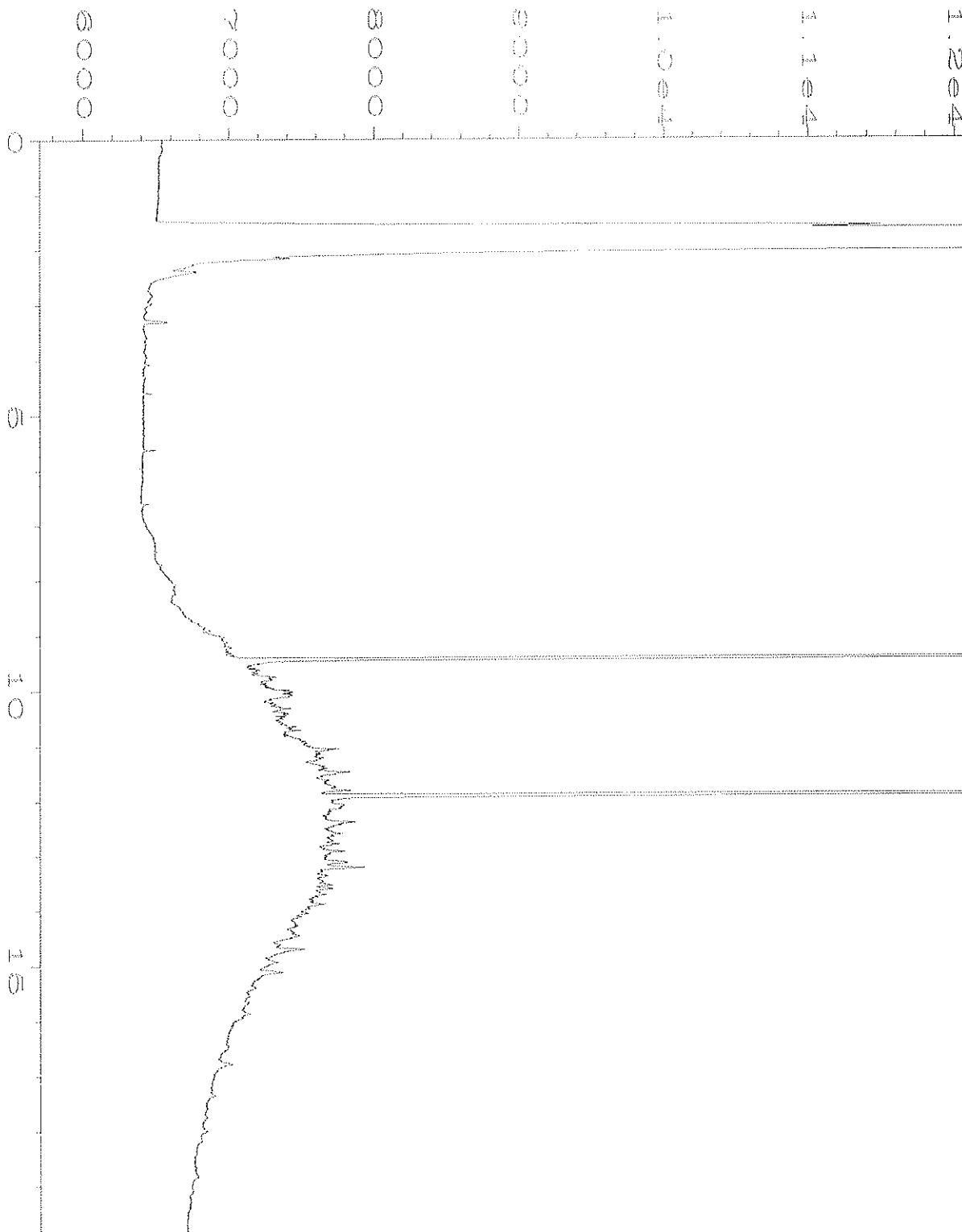
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Operator	: ML	Vial Number	: 16
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-03	Sequence Line	: 7
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 06:25 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:04 AM		



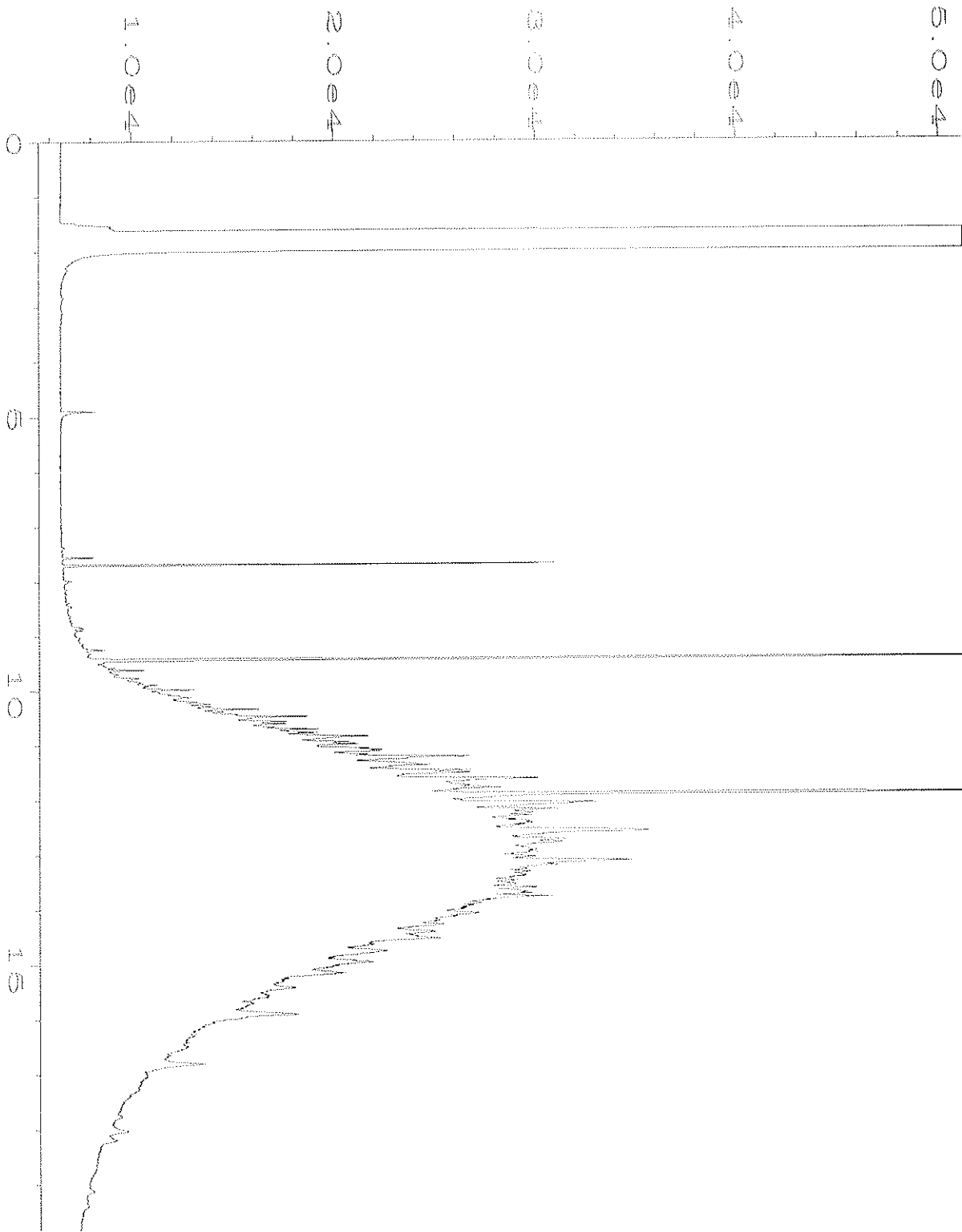
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\017F0701.D	Page Number	: 1
Operator	: ML	Vial Number	: 17
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-05	Sequence Line	: 7
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 06:52 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:04 AM		



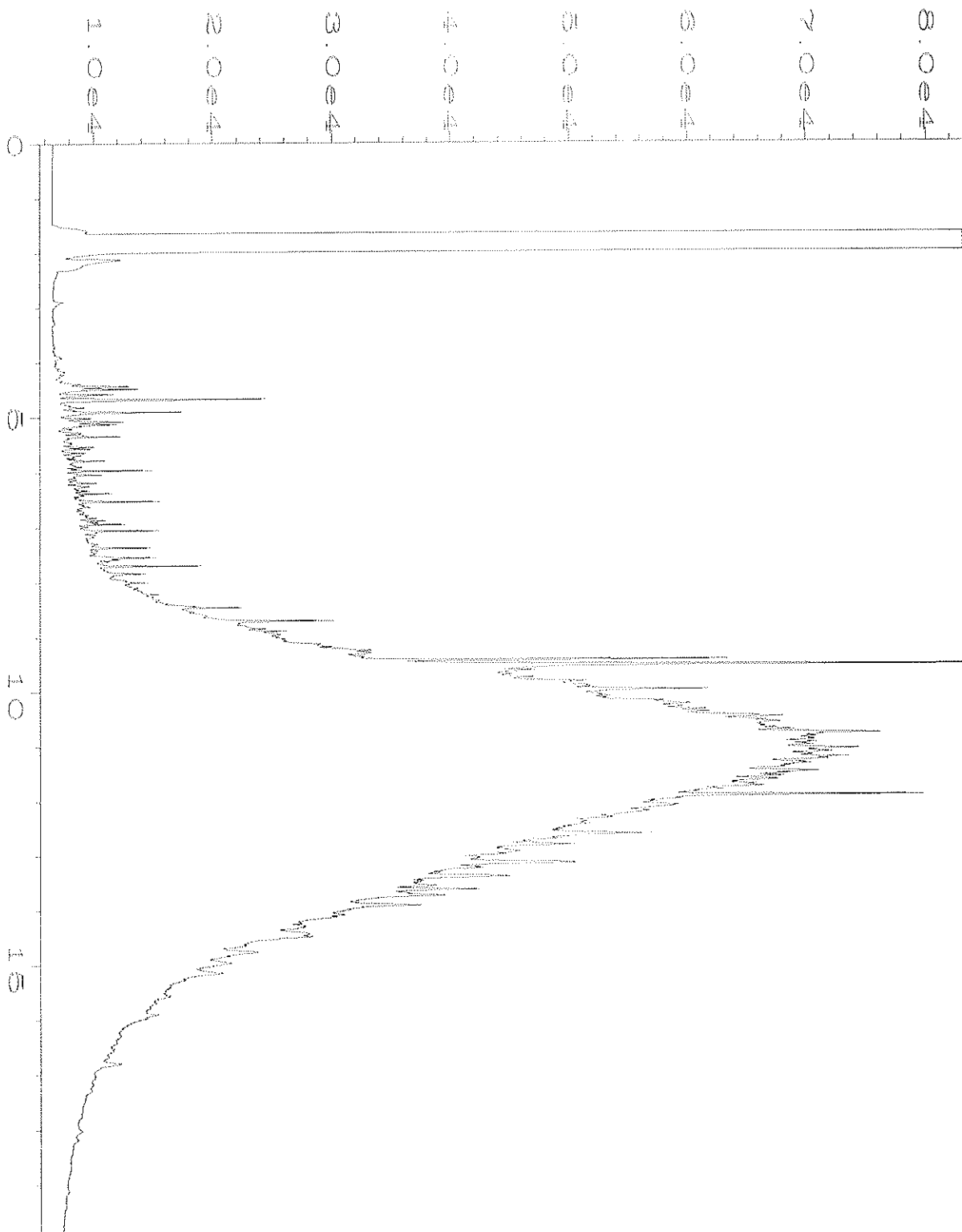
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\018F0701.D	Page Number	: 1
Operator	: ML	Vial Number	: 18
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-07	Sequence Line	: 7
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 07:20 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:04 AM		



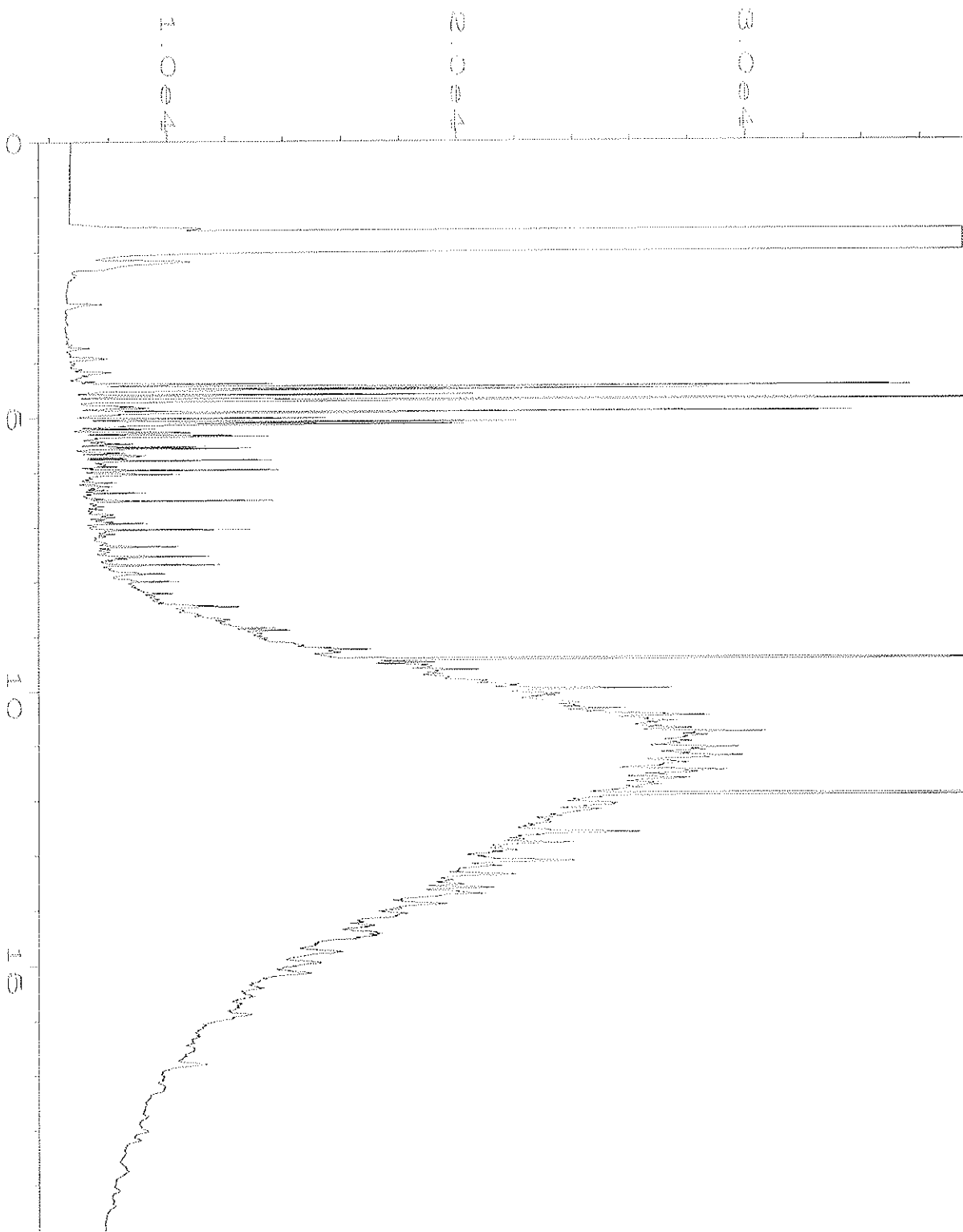
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\019F0701.D	Page Number	: 1
Operator	: ML	Vial Number	: 19
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-09	Sequence Line	: 7
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 07:47 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:05 AM		



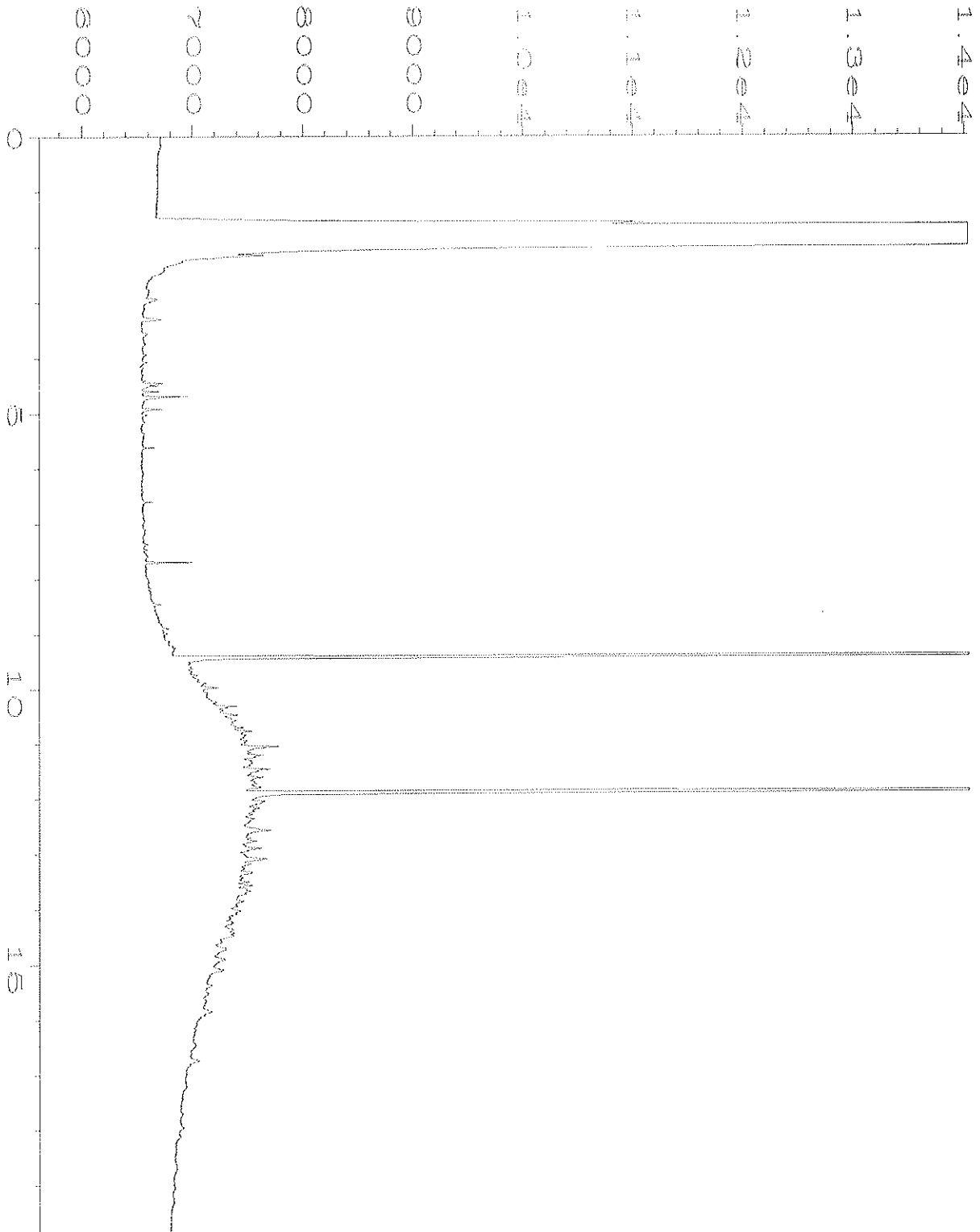
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\020F0701.D	Page Number	: 1
Operator	: ML	Vial Number	: 20
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-11	Sequence Line	: 7
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 08:14 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:05 AM		



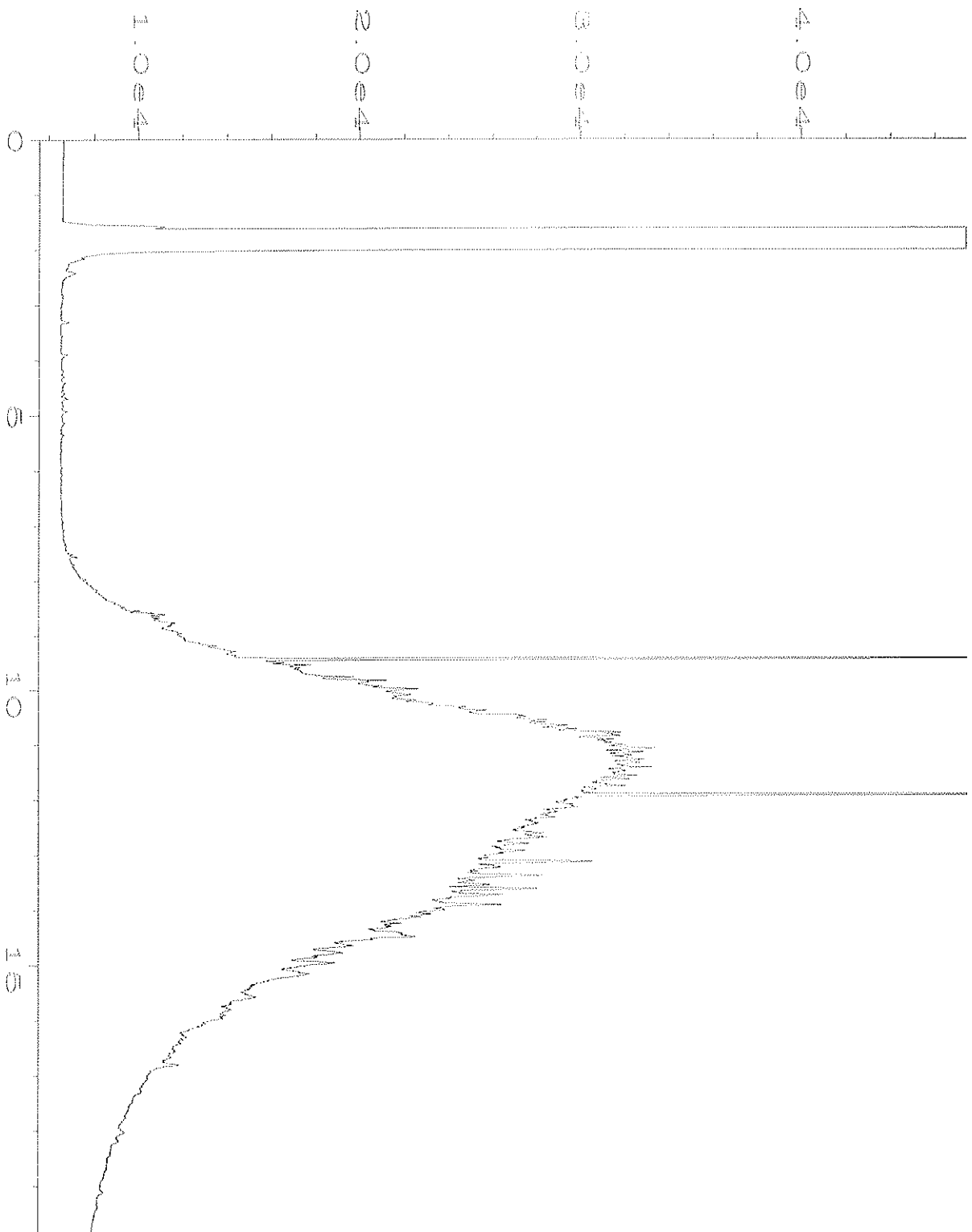
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\021F0701.D	Page Number	: 1
Operator	: ML	Vial Number	: 21
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-12	Sequence Line	: 7
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Acquired on	: 30 Dec 11 08:41 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:05 AM		



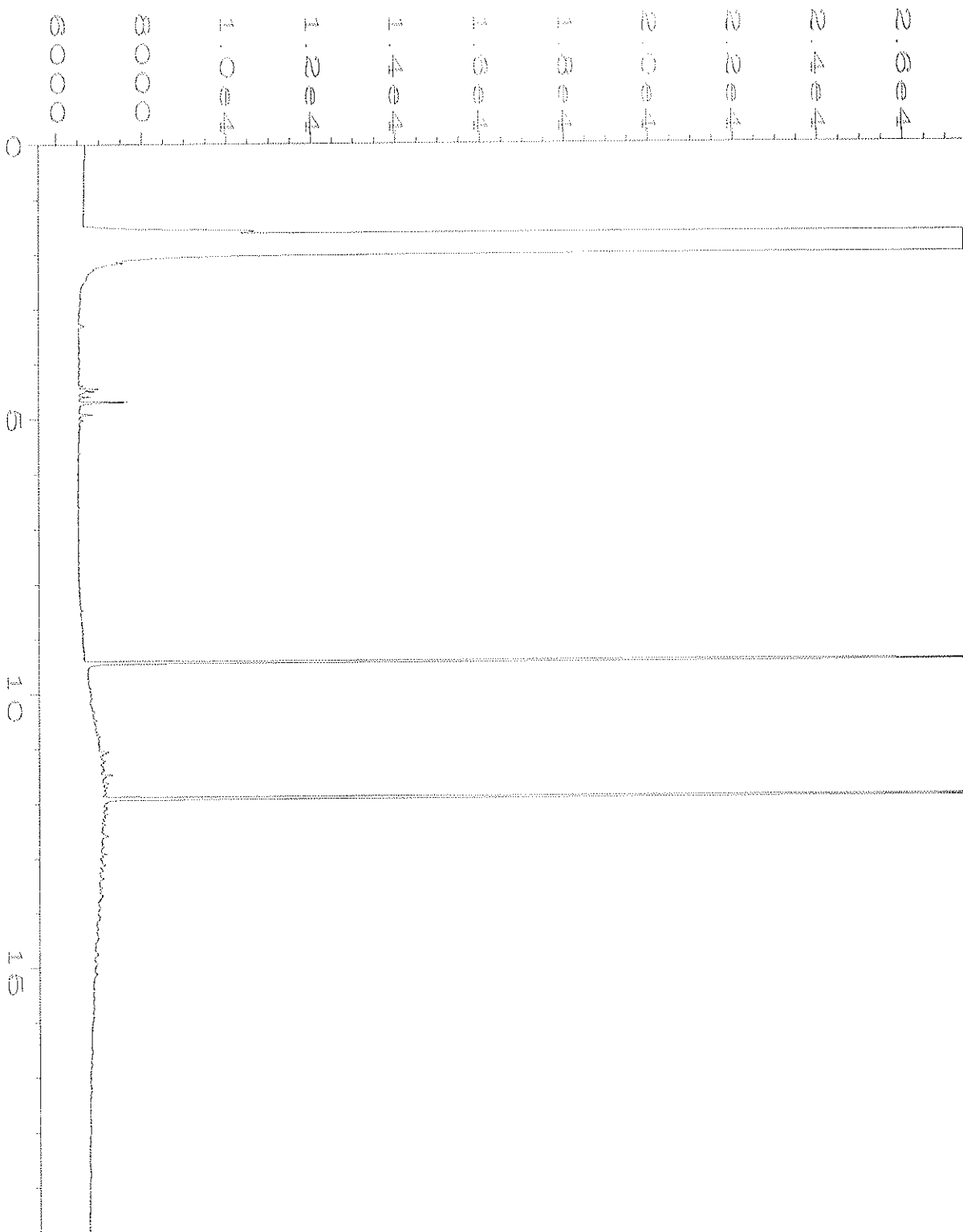
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\022F0701.D	Page Number	: 1
Operator	: ML	Vial Number	: 22
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-13	Sequence Line	: 7
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 09:09 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:05 AM		



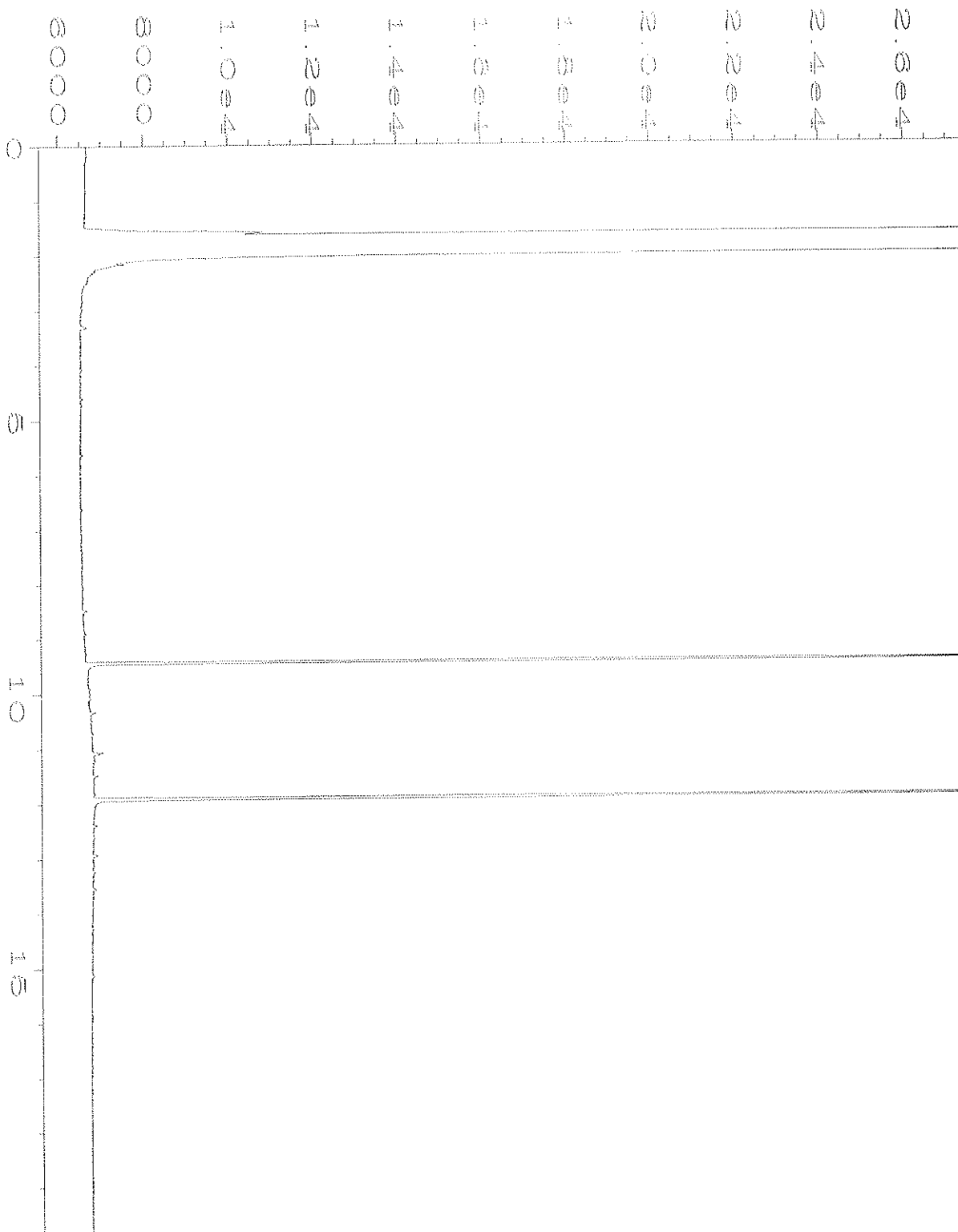
Data File Name	: C:\HPCHEM\1\DATA\01-03-12\081F0401.D	Page Number	: 1
Operator	: ML	Vial Number	: 81
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-14	Sequence Line	: 4
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 03 Jan 12 01:23 PM	Analysis Method	: TPHD.MTH
Report Created on:	04 Jan 12 09:10 AM		



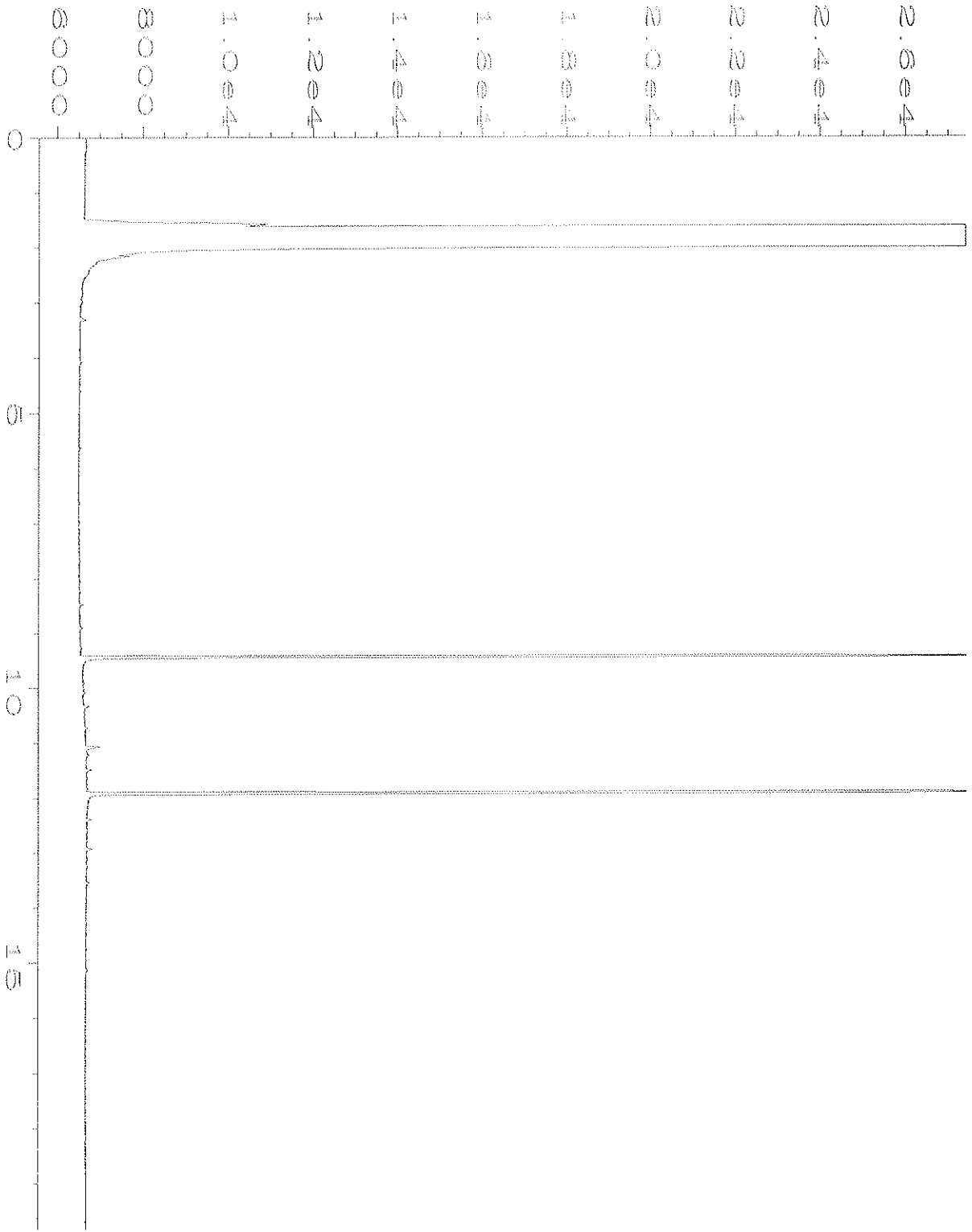
Data File Name : C:\HPCHEM\1\DATA\12-30-11\024F0701.D  
 Operator : ML  
 Instrument : GC1  
 Sample Name : 112394-15  
 Run Time Bar Code:  
 Acquired on : 30 Dec 11 10:03 PM  
 Report Created on: 03 Jan 12 09:06 AM  
 Page Number : 1  
 Vial Number : 24  
 Injection Number : 1  
 Sequence Line : 7  
 Instrument Method: TPHD.MTH  
 Analysis Method : TPHD.MTH



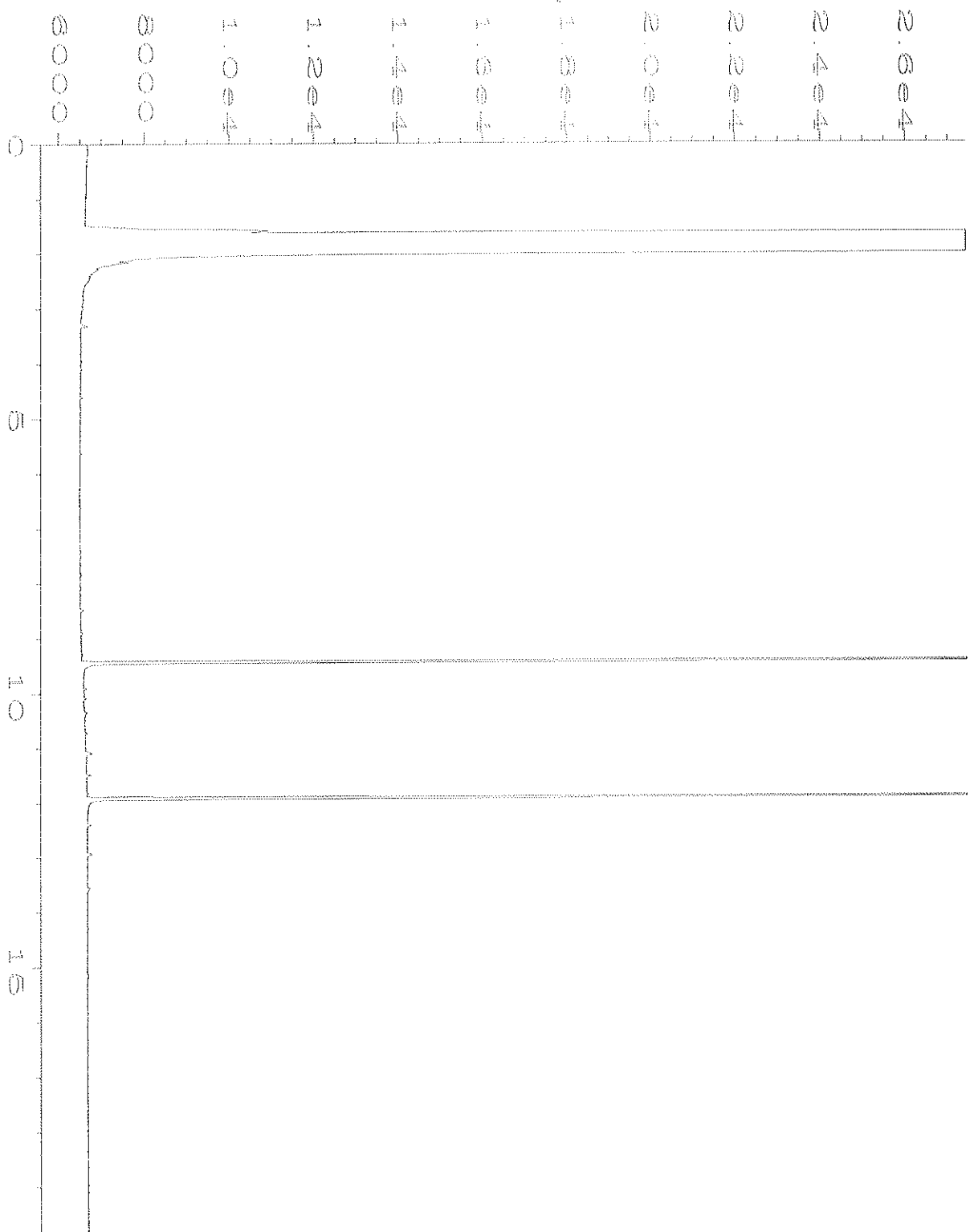
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\025F0901.D	Page Number	: 1
Operator	: ML	Vial Number	: 25
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-16	Sequence Line	: 9
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 11:24 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:06 AM		



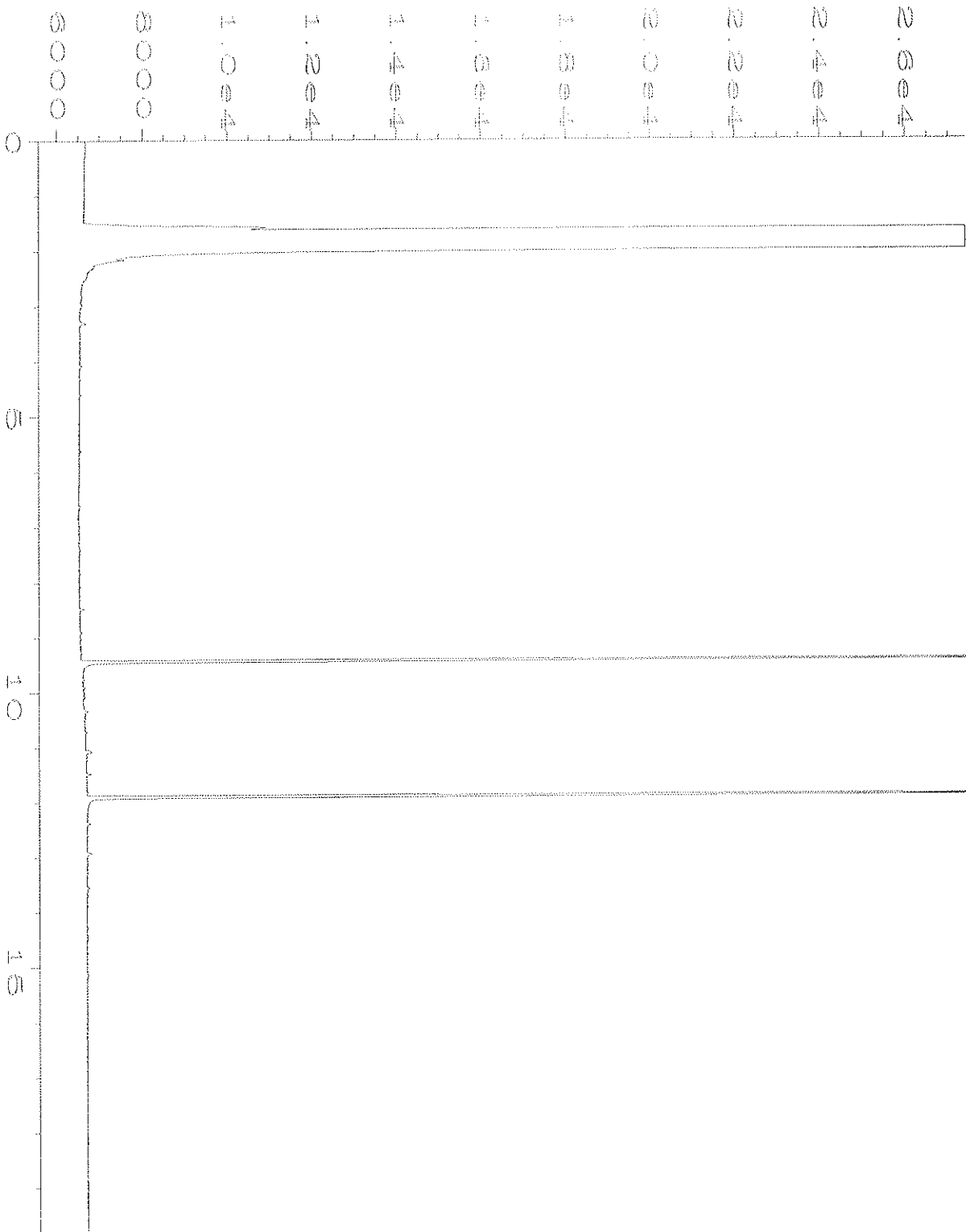
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\026F0901.D	Page Number	: 1
Operator	: ML	Vial Number	: 26
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-17	Sequence Line	: 9
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 11:51 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:06 AM		



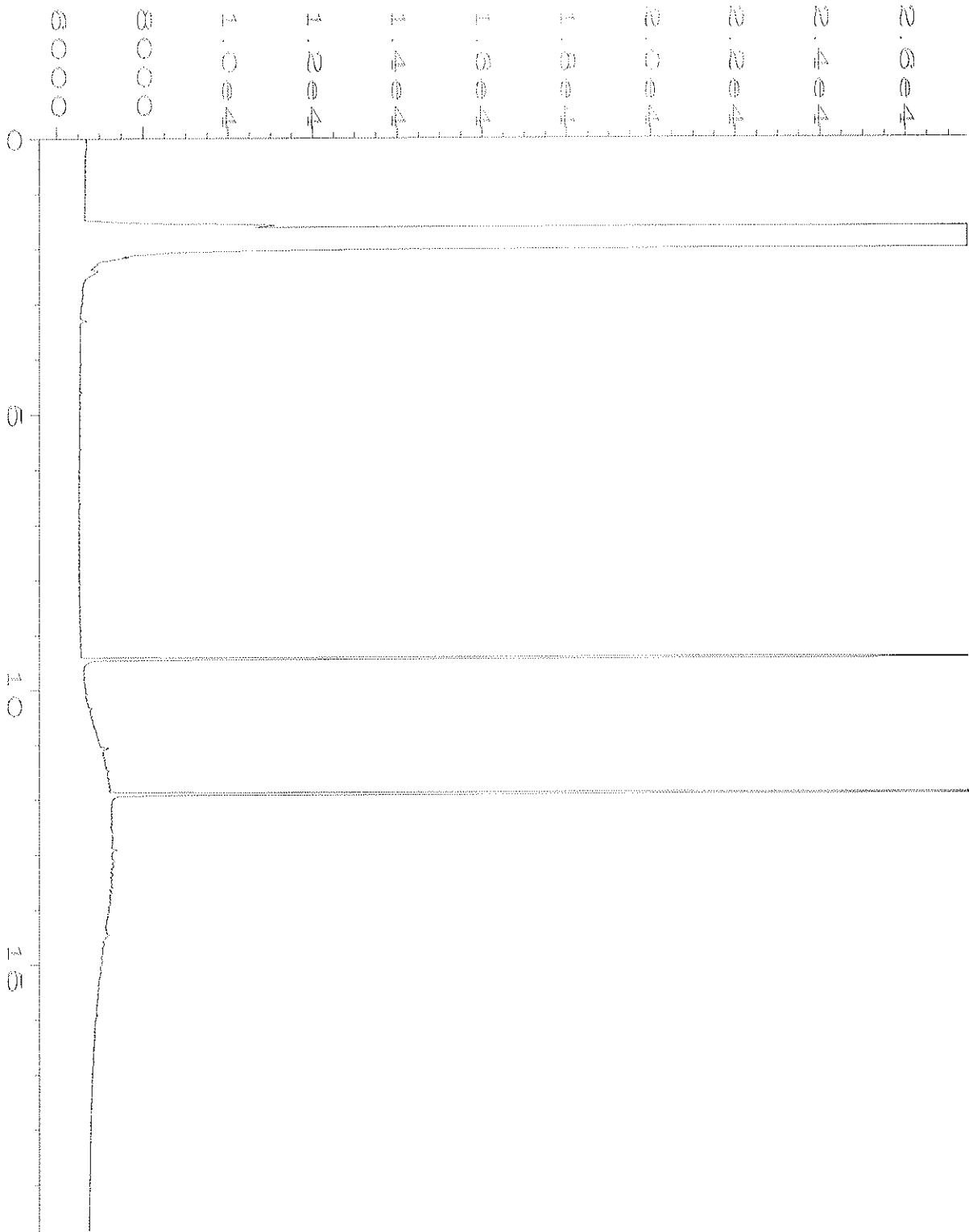
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\027F0901.D	Page Number	: 1
Operator	: ML	Vial Number	: 27
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-18	Sequence Line	: 9
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 31 Dec 11 00:18 AM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:06 AM		



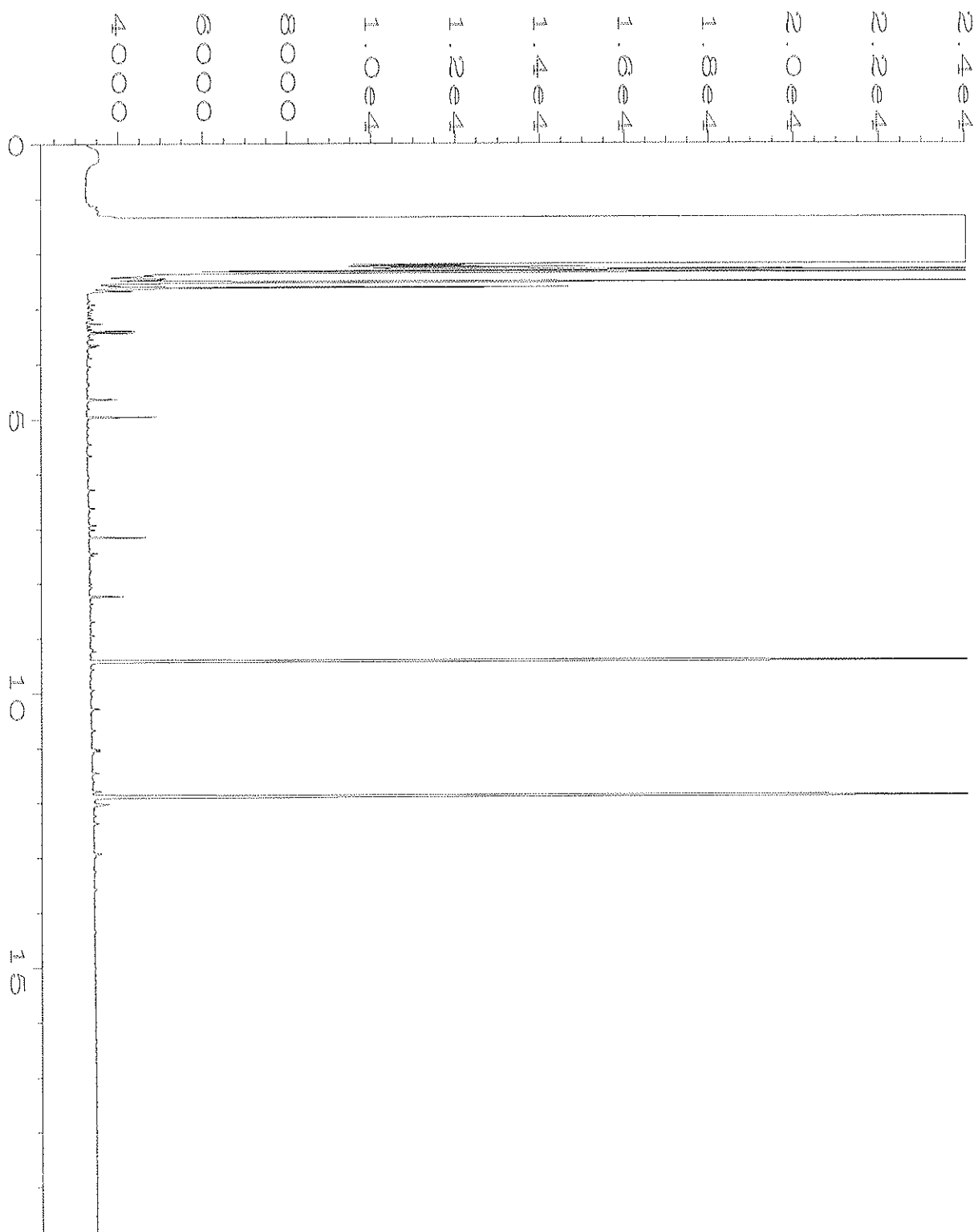
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\028F0901.D	Page Number	: 1
Operator	: ML	Vial Number	: 28
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-19	Sequence Line	: 9
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 31 Dec 11 00:45 AM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:06 AM		



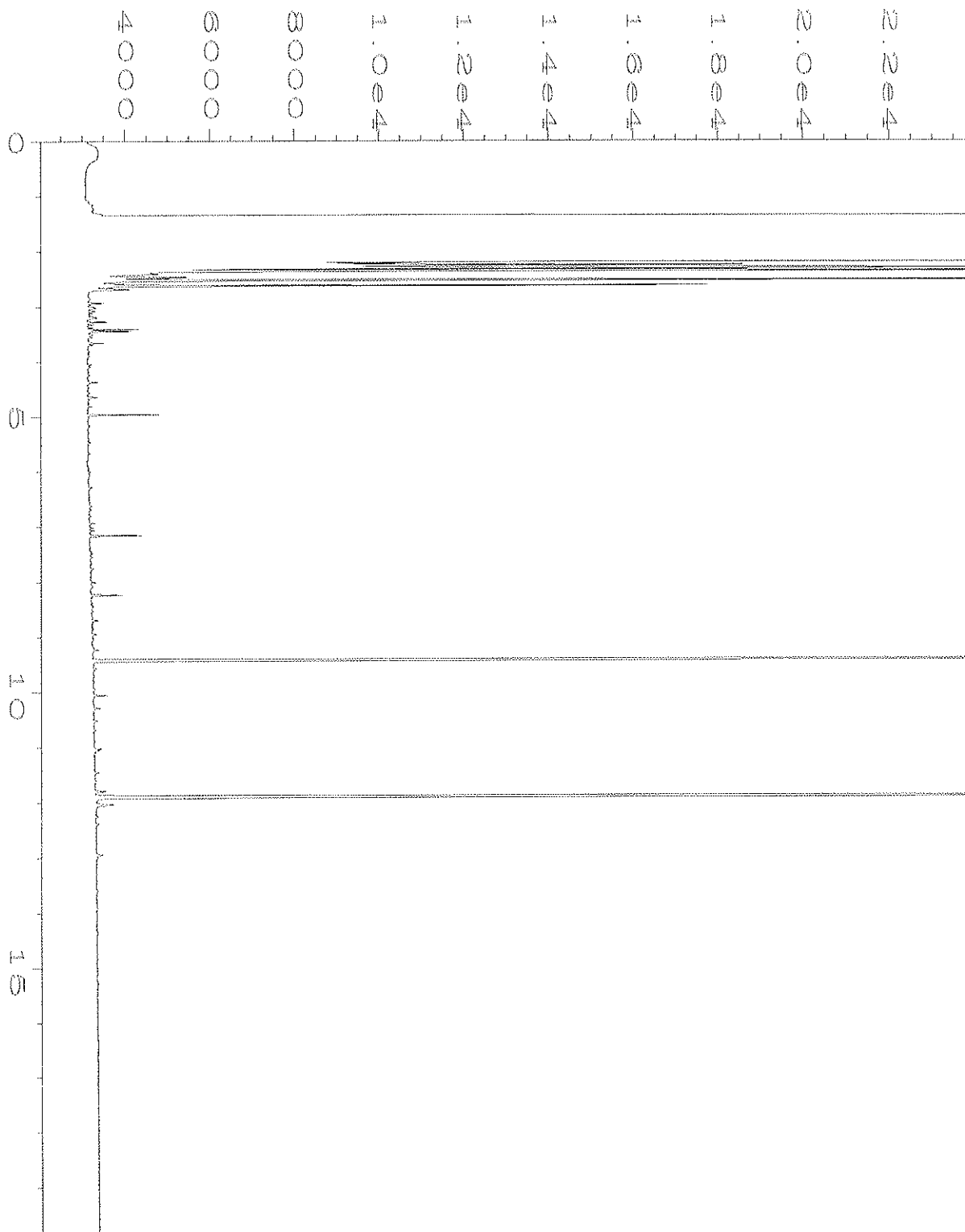
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\029F0901.D	Page Number	: 1
Operator	: ML	Vial Number	: 29
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-20	Sequence Line	: 9
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 31 Dec 11 01:12 AM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:06 AM		



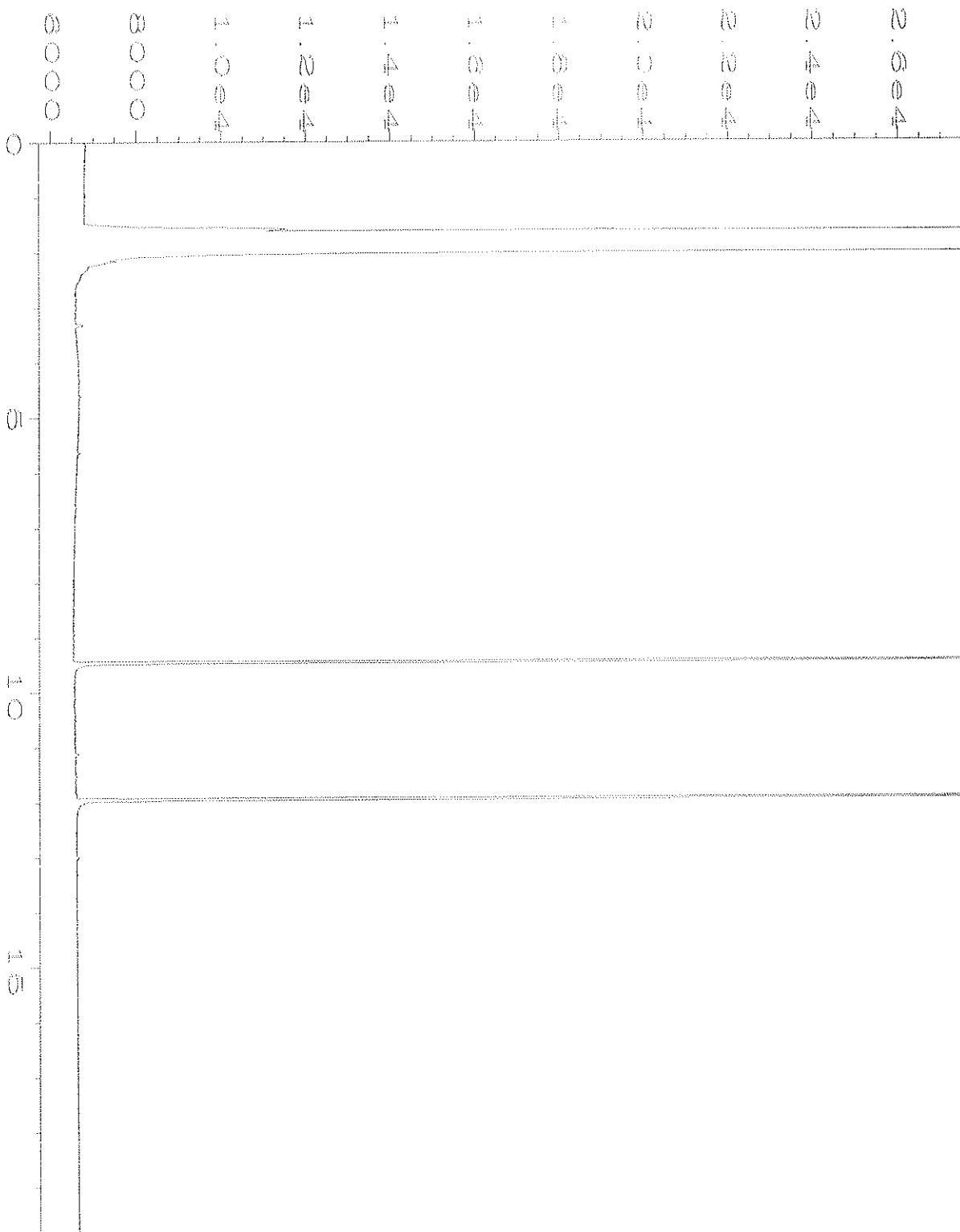
Data File Name	: C:\HPCHEM\1\DATA\12-30-11\030F0901.D	Page Number	: 1
Operator	: ML	Vial Number	: 30
Instrument	: GC1	Injection Number	: 1
Sample Name	: 112394-21	Sequence Line	: 9
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 31 Dec 11 01:39 AM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:06 AM		



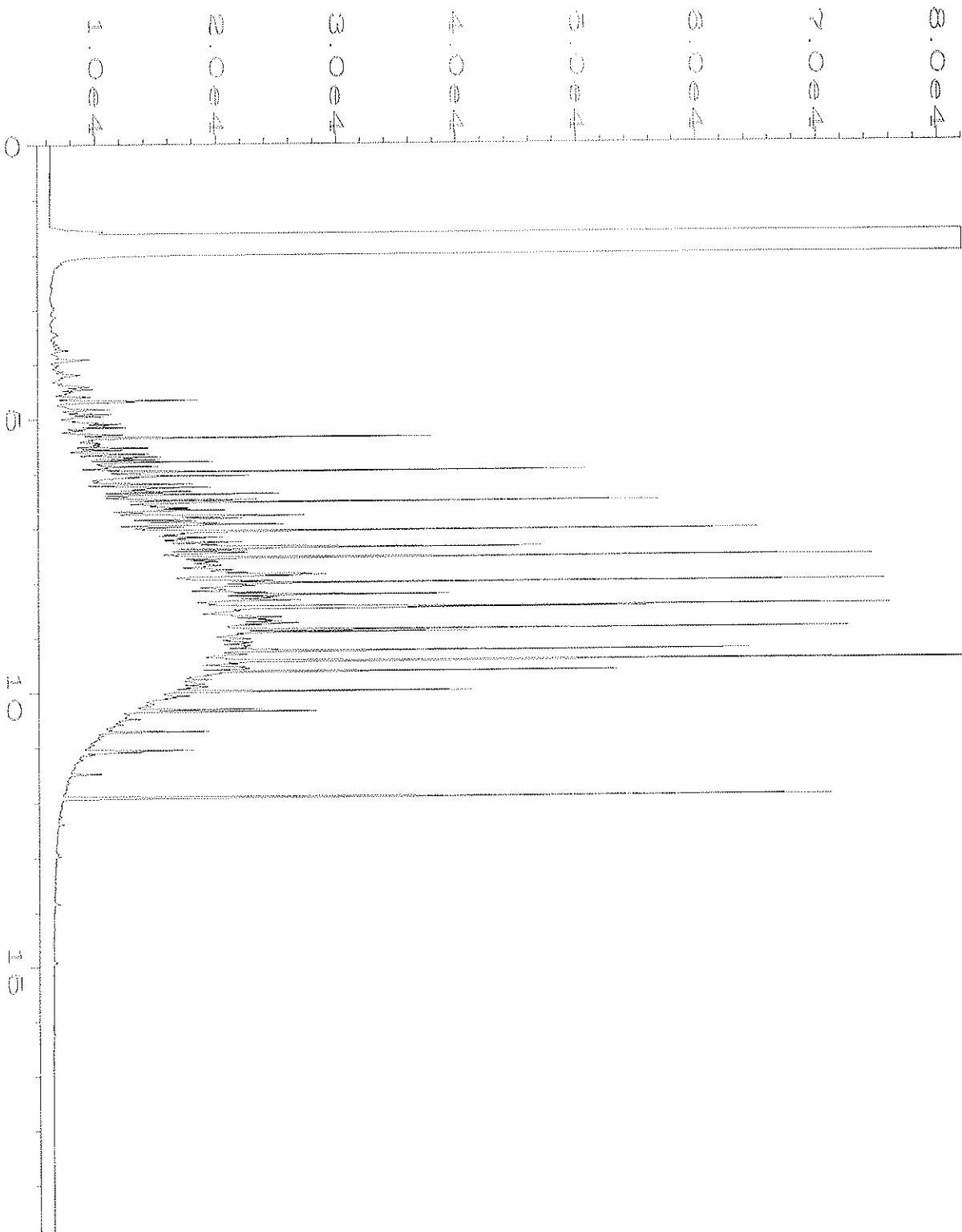
Data File Name	: C:\HPCHEM\4\DATA\12-30-11\010F0401.D	Page Number	: 1
Operator	: ML	Vial Number	: 10
Instrument	: GC#4	Injection Number	: 1
Sample Name	: 112394-22	Sequence Line	: 4
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 12:04 PM	Analysis Method	: BAKEOUT.MTH
Report Created on:	03 Jan 12 09:27 AM		



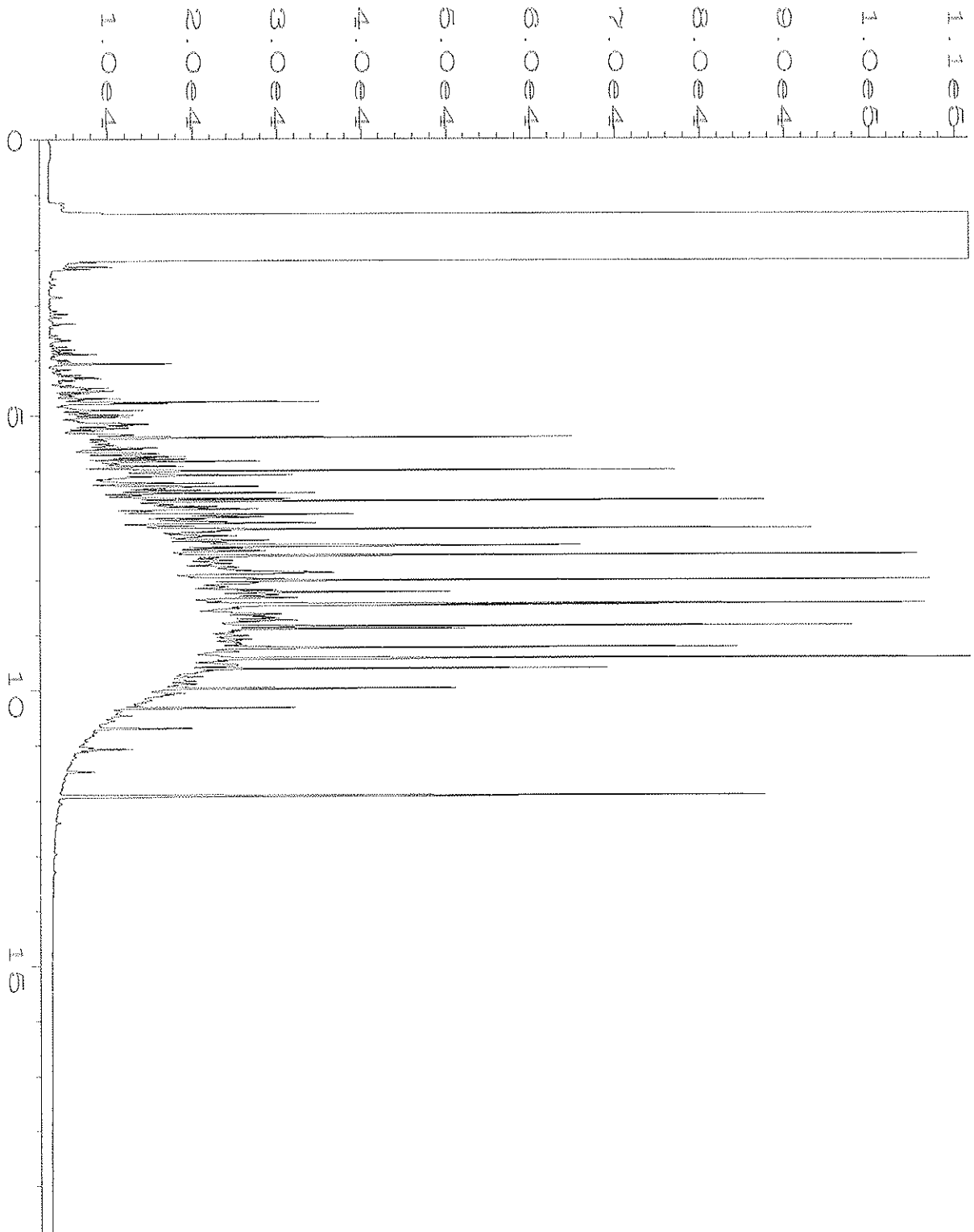
Data File Name	: C:\HPCHEM\4\DATA\12-30-11\007F0401.D	Page Number	: 1
Operator	: ML	Vial Number	: 7
Instrument	: GC#4	Injection Number	: 1
Sample Name	: 01-2308 mb	Sequence Line	: 4
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 10:45 AM	Analysis Method	: BAKEOUT.MTH
Report Created on:	03 Jan 12 09:26 AM		



Data File Name	: C:\HPCHEM\1\DATA\12-30-11\011F0401.D	Page Number	: 1
Operator	: ML	Vial Number	: 11
Instrument	: GC1	Injection Number	: 1
Sample Name	: 01-2303 mb	Sequence Line	: 4
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 02:22 PM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:04 AM		



Data File Name	: C:\HPCHEM\1\DATA\12-30-11\003F0201.D	Page Number	: 1
Operator	: ML	Vial Number	: 3
Instrument	: GC1	Injection Number	: 1
Sample Name	: 500 WADF 37-06B	Sequence Line	: 2
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 09:39 AM	Analysis Method	: TPHD.MTH
Report Created on:	03 Jan 12 09:04 AM		



Data File Name	: C:\HPCHEM\4\DATA\12-30-11\003F0301.D	Page Number	: 1
Operator	: ML	Vial Number	: 3
Instrument	: GC#4	Injection Number	: 1
Sample Name	: 500 WADF 37-06B	Sequence Line	: 3
Run Time Bar Code:		Instrument Method:	TPHD.MTH
Acquired on	: 30 Dec 11 10:19 AM	Analysis Method	: BAKEOUT.MTH
Report Created on:	03 Jan 12 09:26 AM		







