APPENDIX A

Construction Stormwater General Permit

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

September 3, 2025

Brian Gouran
Port of Bellingham
PO Box 1677
Bellingham, WA 98227
Sent by email only: briang@portofbellingham.com

RE: Coverage under the Construction Stormwater General Permit (CSWGP)

Permit number:	**WAR314883**	
Site Name:	**Harris Avenue Shipyard**	
Location:	**201 Harris Ave**	
	Bellingham, WA	**County: Whatcom**
Disturbed Acres:	**3.1**	

Dear Brian Gouran:

The Washington State Department of Ecology (Ecology) received your Notice of Intent for coverage under Ecology's Construction Stormwater General Permit (CSWGP). This is your permit coverage letter. Your permit coverage is effective September 3, 2025.

Retain this letter as an official record of permit coverage for your site. You may keep your records in electronic format if you can easily access them from your construction site. You can get the CSWGP, permit forms, and other information at Ecology's CSWGP eCoverage Packet webpage[1]. Contact your Permit Administrator, listed below, if you want a copy of the CSWGP mailed to you. Please read the permit and contact Ecology if you have any questions.

Additional Monitoring
Please refer to the attached Administrative Order, number 24105, for additional monitoring requirements.

Electronic Discharge Monitoring Reports (WQWebDMR)
This permit requires you to submit monthly discharge monitoring reports (DMRs) for the full duration of permit coverage (from first full month of coverage to termination). Your first sampling and reporting period will be for the month of **October** and your first DMR must be submitted by **November 15, 2025**. You must submit DMRs electronically using Ecology's secure online system, WQWebDMR. To sign up for WQWebDMR go to Ecology's

[1] http://www.ecology.wa.gov/eCoverage-packet

WQWebPortal guidance webpage[2]. If you have questions, contact the portal staff at (360) 407-7097 (Olympia area), or (800) 633-6193/option 3, or email WQWebPortal@ecy.wa.gov.

Appeal Process
You have a right to appeal coverage under the general permit to the Pollution Control Hearing Board (PCHB). Appeals must be filed within 30 days of the date of receipt of this letter. Any appeal is limited to the general permit's applicability or non-applicability to a specific discharger. The appeal process is governed by chapter 43.21B RCW and chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2). For more information regarding your right to appeal, please reference Ecology's Focus Sheet: *Appeal of General Permit Coverage*[3].

Annual Permit Fees
RCW 90.48.465 requires Ecology to recover the costs of managing the permit program. Permit fees are invoiced annually until the permit is terminated. Termination conditions are described in the permit. For permit fee related questions, please contact the Water Quality Fee Unit at wqfeeunit@ecy.wa.gov or (800) 633-6193, Option 2. You can also visit Water Quality Permit Fees Webpage[4] for more information.

Ecology Field Inspector Assistance
If you have questions regarding stormwater management at your construction site, please contact your Regional Inspector, Jen Baptist of Ecology's Bellingham Field Office at jen.baptist@ecy.wa.gov, or (564) 565-0327.

Questions or Additional Information
Ecology is here to help. Please review our Construction Stormwater General Permit webpage[5] for more information. If you have questions about the Construction Stormwater General Permit, please contact your Permit Administrator, Melinda Wilson at melinda.wilson@ecy.wa.gov or (360) 870-8290.

Sincerely,



Jeff Killelea, Manager
Permit and Technical Services Section
Water Quality Program

[2] https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance/WQWebPortal-guidance
[3] https://apps.ecology.wa.gov/publications/summarypages/1710007.html
[4] https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-quality-permits/Fees
[5] www.ecology.wa.gov/constructionstormwaterpermit

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

September 3, 2025

Brian Gouran
Port of Bellingham
PO Box 1677
Bellingham, WA 98227-1677

Re: Administrative Order

Administrative Order Docket #	24105
Site Location	Harris Avenue Shipyard 201 Harris Ave Bellingham, WA 98225

Dear Brian Gouran:

The Department of Ecology (Ecology) is issuing the enclosed Administrative Order (Order) requiring the Port of Bellingham to comply with:

- Chapter 90.48 Revised Code of Washington (RCW) - State of Washington Water Pollution Control Act.
- Chapter 173-201A Washington Administrative Code (WAC) - Water Quality Standards for Surface Waters of the State of Washington.
- Construction Stormwater General Permit WAR314883: National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associated with Construction Activity.

If you have questions about this Order, please contact Amy Jankowiak at amy.jankowiak@ecy.wa.gov or 206-594-0165.

Sincerely,

Rachel McCrea

Rachel McCrea
Water Quality Section Manager
Northwest Region Office

Enclosure: Administrative Order Docket #24105

By Certified Mail #9171 9690 0935 0233 1452 61

cc: Steve Germiat, Aspect Consulting
Larry Scholten, Port of Bellingham
PARIS Permit No. WAR314883

State of Washington
Department of Ecology

In the Matter of an Administrative Order Against PORT OF BELLINGHAM BRIAN GOURAN Administrative Order Docket #24105

To: Brian Gouran
Port of Bellingham
PO Box 1677
Bellingham, WA 98227-1677

Administrative Order Docket #	24105
Site Location	Harris Avenue Shipyard 201 Harris Ave Bellingham, WA 98225

The Department of Ecology (Ecology) has issued this Administrative Order (Order) requiring the Port of Bellingham to comply with:

- Chapter 90.48 Revised Code of Washington (RCW) - State of Washington Water Pollution Control Act.
- Chapter 173-201A Washington Administrative Code (WAC) - Water Quality Standards for Surface Waters of the State of Washington.
- Construction Stormwater General Permit WAR314883: National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associated with Construction Activity.

This is an Administrative Order in accordance with General Condition G12 (Additional Monitoring) as set forth in the Construction Stormwater General Permit. RCW 90.48.120(2) authorizes Ecology to issue Administrative Orders to accomplish the purposes of Chapter 90.48 RCW.

1. Order to Comply

The Port of Bellingham is subject to coverage under NPDES Construction Stormwater General Permit (CSGP) WAR314883 for construction activities associated with the construction site known as Harris Avenue Shipyard (201 Harris Ave, Bellingham WA 98225). The project consists of 3.1 disturbed acres. The proposed project involves remediation activities including excavation and proper off-site disposal of contaminated soil, with concurrent dewatering as needed to facilitate soil removal and handling, along with demolition and removal of structural obstructions (asphalt, foundations, etc.).

The receiving waterbody following treatment is Bellingham Bay. Ecology was notified of the presence of onsite groundwater and/or soil contamination, which has the potential to discharge in stormwater and dewatering water due to the proposed construction activity. The Construction Stormwater General Permit does not have water quality sampling or benchmarks for the known contaminants of concern, listed in Table 1, below; however, the permit requires compliance with the Water Quality Standards for Surface Waters of the State of Washington (Chapter 173-201A WAC) and prohibits any discharges of pollutants.

The Order establishes Indicator Levels for the Harris Avenue Shipyard project. Indicator Levels express a pollutant concentration used as a threshold, below which a pollutant is considered unlikely to cause a water quality violation, and above which it may. Indicator Levels in this Administrative Order were derived from Chapter 173-201A WAC and the analytical method's minimum quantitation level.

For these reasons and in accordance with RCW 90.48.120(2) it is ordered that the Port of Bellingham take the following actions. These actions are required at the location known as Harris Avenue Shipyard, located at 201 Harris Ave, Bellingham, WA 98225. In the event of a permit transfer to another Permittee, compliance with this Administrative Order and the actions listed below is required.

The Port of Bellingham must take the following actions to remain in compliance with NPDES Permit WAR314883:

- Install all pre-treatment and treatment systems prior to any discharge of contaminated dewatering water or contaminated construction stormwater to the receiving waterbody.
- Capture, contain, and treat all contaminated dewatering water or contaminated construction stormwater prior to discharge to the receiving waterbody.
- Use an Ecology-approved treatment system and media filtration to treat any contaminated dewatering water or contaminated construction stormwater. Ecology must be notified in advance if any changes in the treatment are made, with the exception of routine maintenance.
- All captured sediment from the treatment of the contaminated dewatering water or contaminated construction stormwater must be transported to an approved disposal facility based on the level of contamination.

The treatment system must have enough capacity to hold treated contaminated dewatering water or contaminated construction stormwater until it has been tested to determine if any of the Indicator Levels listed in Table 1 have been met. No contaminated dewatering water or contaminated construction stormwater may be discharged before it has been tested for the parameters listed in Table 1. If any of the Indicator Levels listed in Table 1 are exceeded, the treated contaminated dewatering water or contaminated construction stormwater must not be

discharged to the receiving waterbody until it has been retested to determine that all parameters are equal to or below the Indicator Levels in Table 1. If any of the Indicator Levels are exceeded after being retested, the Port of Bellingham must modify the existing treatment to increase effectiveness, install an additional Ecology-approved treatment system, or truck the contaminated construction stormwater or groundwater off-site for disposal in an approved manner. The Port of Bellingham may also discharge to sanitary sewer with the approval of the proper sewer authority.

Once the effectiveness of the treatment system has been determined, the Port of Bellingham may revert to a flow-through treatment system after a minimum of two sampling and testing events and upon written approval from Ecology. The flow-through treatment system design and batch sampling results must be submitted to Ecology for review prior to use.

- If a flow-through treatment system is adopted, all contaminated dewatering water or contaminated construction stormwater must be sampled weekly while discharging and tested for the parameters listed in Table 1.

- When using a flow-through treatment system, if any of the Indicator Levels listed in Table 1 are exceeded, the Port of Bellingham must stop the discharge of treated contaminated dewatering water or contaminated construction stormwater to the receiving waterbody until it has been retested to determine that all parameters are equal to or below the Indicator Levels in Table 1. If any of the Indicator Levels are exceeded after being retested, the Port of Bellingham must modify the existing flow-through treatment system to increase its effectiveness, install an additional Ecology-approved treatment system, or truck the contaminated construction stormwater or contaminated dewatering water off-site for disposal in an approved manner. The Port of Bellingham may also discharge the treated water to sanitary sewer in accordance with the conditions of the discharge authorization from the proper sewer authority.

- Sampling for the contaminants listed in Table 1 must be reported on the required Discharge Monitoring Report (DMR) according to Permit Conditions (S5.B Discharge Monitoring Reports).

- If sampling is conducted more frequently than required by this Order, the results of this monitoring must be included in the calculation and reporting of the data that is submitted in the DMR.

- Any discharge to Waters of the State in exceedance of the contaminant Indicator Levels in Table 1 must be reported to the Department of Ecology according to Permit Condition S5.F, Noncompliance Notification as follows:

    - Immediately notify Ecology of noncompliance by calling the regional 24-hour Environmental Report Tracking System (ERTS) phone number (206) 594-0000 (note that this is a new phone number as of 5/17/2021).

  - Cease the discharge until Indicator Levels can be met.
  - Submit a detailed, written report to Ecology within five (5) days, unless requested earlier by Ecology. See Permit condition S5.F.3 for the full written report requirements.
  - For exceedances of the numeric benchmark for pH, refer to Special Condition S4.D.4 of the CSGP.

- All monitoring data must be prepared by a laboratory registered or accredited under the provisions of Accreditation of Environmental Laboratories, Chapter 137-50 WAC.
- All sampling data must be reported monthly on DMRs electronically using Ecology's secure online system WQWebDMR, in accordance to permit condition S5.B. If the measured concentration is below the detection level then the Port of Bellingham must report single analytical values below detection as "less than the detection level (DL)" by entering "<" followed by the numeric value of the detection level (e.g. "<0.1"). All other values above DL must be reported as the numeric value.
- Contaminated soils excavated during construction will be immediately hauled offsite without stock piling to an approved disposal facility based on the level of contamination. When it is not feasible to immediately haul soils offsite, the soils must be placed in a covered area to minimize contact with stormwater.
- Noncompliance with permit requirements or the provisions of this Order (such as exceedances of indicator levels) must be immediately reported to the Northwest Region Office of the Department of Ecology in accordance with Permit Condition S5.F, Noncompliance Notification.
- The Stormwater Pollution Prevention Plan (SWPPP) prepared for Harris Avenue Shipyard must be fully implemented and amended as needed for the duration of the project.
- If a modification of the Order is desired, a written request must be submitted to Ecology and if approved, Ecology will issue an amendment to this Order.

Ecology retains the right to make modifications to this Order through supplemental Order, or amendment to this Order, it if appears necessary to further protect the public interest.

This Order does not exempt the Port of Bellingham from any Construction Stormwater General Permit requirement. This Order automatically terminates when NPDES Construction Stormwater General Permit WAR314883 is terminated.

Table 1. Marine Water Parameters

The Port of Bellingham must use the specified analytical methods, detection limits (DLs) and quantitation levels (QLs) in the following table for monitoring unless the method used produces measurable results in the sample and EPA has listed it as an EPA-approved method in 40 CFR Part 136. If the Port of Bellingham uses an alternative method, not specified in the order and as allowed above, it must report the test method, DL, and QL on the discharge monitoring report.

Pollutant & CAS No. (if available)	Sampling Frequency*	Sample Type	Indicator Level, µg/L unless otherwise noted	Required Analytical Protocol	Detection Level, µg/L unless otherwise noted	Quantitation Level, µg/L unless otherwise noted
PETROLEUM HYDROCARBONS						
BTEX (benzene, toluene, ethylbenzene and O,M,P xylenes)	Batch/Weekly	Grab	2.0 [a]	SW 846 8021/ 8260	1.0	2.0
Diesel and Oil-Range Hydrocarbons (NWTPH-Dx) [b]	Batch/Weekly	Grab	250 [a]	NWTPH-Dx	250	250
Gasoline-Range Hydrocarbons (NWTPH-Gx) [c]	Batch/Weekly	Grab	250 [a]	NWTPH-Gx	250	250
METALS						
Arsenic, Total (7440-38-2)	Batch/Weekly	Grab	69 [d]	200.8	0.1	0.5
Beryllium, Total (7440-41-7)	Batch/Weekly	Grab	0.5 [a]	200.8	0.1	0.5
Cadmium, Total (7440-43-9)	Batch/Weekly	Grab	42.25 [d]	200.8	0.05	0.25
Chromium, Total (7440-47-3)	Batch/Weekly	Grab	1100 [e]	200.8	0.2	1.0
Copper, Total (7440-50-8)	Batch/Weekly	Grab	5.78 [d]	200.8	0.4	2.0
Lead, Total (7439-92-1)	Batch/Weekly	Grab	220.82 [d]	200.8	0.1	0.5
Mercury, Total (7439-97-6)	Batch/Weekly	Grab	2118 [d]	1631E	0.0002	0.0005
Nickel, Total (7440-02-0)	Batch/Weekly	Grab	74.75 [d]	200.8	0.1	0.5
Selenium, Total (7782-49-2)	Batch/Weekly	Grab	290.58 [d]	200.8	1.0	1.0
Zinc, Total (7440-66-6)	Batch/Weekly	Grab	95.14 [d]	200.8	0.5	2.5

Pollutant & CAS No. (if available)	Sampling Frequency*	Sample Type	Indicator Level, µg/L unless otherwise noted	Required Analytical Protocol	Detection Level, µg/L unless otherwise noted	Quantitation Level, µg/L unless otherwise noted
VOLATILE ORGANIC COMPOUNDS (VOCs), SEMI VOCs AND HALOGENATED VOCs						
Acetone (67-64-1)	Batch/Weekly	Grab	5.0 [a]	624.1	5.0	5.0
Benzoic Acid (65-85-0)	Batch/Weekly	Grab	50 [a]	8270	10	50
n-Butylbenzene (104-51-8)	Batch/Weekly	Grab	5.0 [a]	624/8260	5.0	5.0
sec-Butylbenzene (135-98-8)	Batch/Weekly	Grab	5.0 [a]	624/8260	5.0	5.0
Carbazole (86-74-8)	Batch/Weekly	Grab	0.85 [a]	625.1	0.42	0.85
Chloroform (67-66-3)	Batch/Weekly	Grab	4.8 [a]	624.1 or SM6210B	1.6	4.8
Dibenzofuran (132-64-9)	Batch/Weekly	Grab	1.0 [a]	625.1	0.5	1
bis(2-ethylhexyl)phthalate (117-81-7)	Batch/Weekly	Grab	7.5 [a]	625.1	2.5	7.5
Tributyltin (TBT) (688-73-3)	Batch/Weekly	Grab	0.42 [i]	Any Ecology Accredited Method [j]	0.0046	0.05
Methylene chloride (75-09-2)	Batch/Weekly	Grab	8.4 [a]	624.1	2.8	8.4
4-methylphenol (106-44-5)	Batch/Weekly	Grab	10.0 [a]	8270	10	10
N-Nitrosodiphenylamine (86-30-6)	Batch/Weekly	Grab	2.0 [a]	625.1	1.0	2.0
Pentachlorophenol (87-86-5)	Batch/Weekly	Grab	13.0 [d]	625.1	3.6	10.8
n-propylbenzene (103-65-1)	Batch/Weekly	Grab	5.0 [a]	8260	5.0	5.0
1,2,4 –Trimethylbenzene (95-63-6)	Batch/Weekly	Grab	5.0 [a]	8260	5.0	5.0
POLYCYCLIC AROMATIC HYDROCARBONS (PAH) AND CARCINOGENIC PAHs						
Acenaphthene (83-32-9)	Batch/Weekly	Grab	5.7 [a]	625.1	1.9	5.7
Acenaphthylene (208-96-8)	Batch/Weekly	Grab	10.5 [a]	625.1	3.5	10.5
Anthracene (120-12-7)	Batch/Weekly	Grab	5.7 [a]	625.1	1.9	5.7
Benzo(a)anthracene (56-55-3)	Batch/Weekly	Grab	23.4 [a]	625.1	7.8	23.4
Benzo(a)pyrene (50-32-8)	Batch/Weekly	Grab	7.5 [a]	610/625.1	2.5	7.5

Pollutant & CAS No. (if available)	Sampling Frequency*	Sample Type	Indicator Level, µg/L unless otherwise noted	Required Analytical Protocol	Detection Level, µg/L unless otherwise noted	Quantitation Level, µg/L unless otherwise noted
Benzo(b)fluoranthene (205-99-2)	Batch/Weekly	Grab	14.4 [a]	610/625.1	4.8	14.4
Benzo(g,h,i)perylene (191-24-2)	Batch/Weekly	Grab	12.3 [a]	610/625.1	4.1	12.3
Benzo(k)fluoranthene (207-08-9)	Batch/Weekly	Grab	7.5 [a]	610/625.1	2.5	7.5
Chrysene (218-01-9)	Batch/Weekly	Grab	7.5 [a]	610/625.1	2.5	7.5
Cymene/p-Isopropyltoluene (99-87-6)	Batch/Weekly	Grab	5.0 [a]	8260	5.0	5.0
Dibenzo(a-h)anthracene (53-70-3)	Batch/Weekly	Grab	7.5 [a]	625.1	2.5	7.5
Dibutyl phthalate (84-74-2)	Batch/Weekly	Grab	7.5[a]	625.1	2.5	7.5
Dimethyl phthalate (131-11-3)	Batch/Weekly	Grab	4.8 [a]	625.1	1.6	4.8
Fluoranthene (206-44-0)	Batch/Weekly	Grab	6.6 [a]	625.1	2.2	6.6
Fluorene (86-73-7)	Batch/Weekly	Grab	5.7 [a]	625.1	1.9	5.7
Indeno(1,2,3-cd)pyrene (193-39-5)	Batch/Weekly	Grab	11.1 [a]	610/625.1	3.7	11.1
1-Methylnaphthalene (90-12-0)	Batch/Weekly	Grab	1.0 [a]	625.1	0.5	1
2-Methylnaphthalene (91-57-6)	Batch/Weekly	Grab	1.0 [a]	625.1	0.5	1
Naphthalene (91-20-3)	Batch/Weekly	Grab	4.8 [a]	625.1	1.6	4.8
Phenanthrene (85-01-8)	Batch/Weekly	Grab	16.2 [a]	625.1	5.4	16.2
Pyrene (129-00-0)	Batch/Weekly	Grab	5.7 [a]	625.1	1.9	5.7
PESTICIDES/POLYCHLORINATED BIPHENYLS (PCBs)						
PCBs, Total [g]	Batch/Weekly	Grab	10.0 [h]	608.3	0.065	0.195
CONSTRUCTION STORMWATER GENERAL PERMIT BENCHMARKS						
Parameter	**Sampling Frequency***	**Sample Type**	**Benchmark**	**Analytical Method**		
Turbidity	Batch/Weekly	Grab	25 NTU	SM2130 [f]		
pH	Batch/Weekly	Grab	6.5 - 8.5 SU	SM4500-H^+ B		

NOTES	
a	No applicable surface water criterion; value is laboratory quantitation level.
b	NWTPH-Dx = Northwest Total Petroleum Hydrocarbons – Semi-volatile ("diesel") for diesel range organics and heavy oils (includes jet fuels, kerosene, diesel-oils, hydraulic fluids, mineral oils, lubricating oils, and fuel oils).
c	NWTPH-Gx = Northwest Total Petroleum Hydrocarbons – Volatile petroleum products including aviation and automotive gasolines, mineral spirits, Stoddard solvent, and naphtha.
d	Acute – Marine Water Toxic Substances Criteria (WAC 173-201A-240) calculated using conversion factors per Table 240.
e	Indicator Level total chromium is actually for hexavalent chromium using Acute – Marine Water Toxic Substances Criteria (WAC 173-201A-240) because there is no water quality standard for total chromium.
f	Or equivalent.
g	Total PCBs are the sum of all congener or all isomer or homolog or Aroclor analyses.
h	Acute – Marine/Saltwater Toxic Substances Criteria (WAC 173-201A-240) (2016)
i	Acute Marine Aquatic Life Criteria from EPA National Recommended WQ Criteria (2004)
j	Refer to How to choose an analytical laboratory - Washington State Department of Ecology[1] for labs with accredited methods for TBT.
*****	If permission is granted for flow through, sampling will then be weekly.

[1] https://ecology.wa.gov/regulations-permits/permits-certifications/laboratory-accreditation/how-to-choose-an-analytical-laboratory

2. Failure to Comply With This Order

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

3. Your Right to Appeal

You have a right to appeal this Order to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt. The appeal process is governed by RCW 43.21B and WAC 371-08. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal, you must do all of the following within 30 days of the date of receipt of this Order:

- File your notice of appeal and a copy of this Order with the PCHB (see filing information below). "Filing" means actual receipt by the PCHB during regular business hours as defined in WAC 371-08-305 and -335. "Notice of appeal" is defined in WAC 371-08-340.
- Serve a copy of your notice of appeal and this Order on the Department of Ecology mail, in person, or by email (see addresses below).

You must also comply with other applicable requirements in RCW 43.21B and WAC 371-08.

Filing with the PCHB

For the most current information regarding filing with the PCHB, visit: https://eluho.wa.gov/ or call: 360-664-9160.

Service on Ecology

Street Address:
Department of Ecology
Attn: Appeals Processing Desk
300 Desmond Drive SE
Lacey, WA 98503

Mailing Address:
Department of Ecology
Attn: Appeals Processing Desk
PO Box 47608
Olympia, WA 98504-7608

E-Mail Address:
ecologyappeals@ecy.wa.gov

4. Contact Information

Please direct all questions about this Administrative Order to:

Amy Jankowiak
Department of Ecology
Northwest Region Office
P.O. Box 330316
Shoreline, WA 98133-9716

Phone: 206-594-0165
Email: amy.jankowiak@ecy.wa.gov

5. More Information

- **Pollution Control Hearings Board Website:**
  https://www.eluho.wa.gov/
- **Chapter 43.21B RCW – Environmental and Land Use Hearings Office – Pollution Control Hearings Board:**
  https://app.leg.wa.gov/RCW/default.aspx?cite=43.21B
- **Chapter 371-08 WAC – Practice and Procedure**
  https://app.leg.wa.gov/WAC/default.aspx?cite=371-08
- **Chapter 34.05 RCW – Administrative Procedure Act**
  https://app.leg.wa.gov/RCW/default.aspx?cite=34.05
- **Ecology's Laws, Rules, & Rulemaking Website**
  https://ecology.wa.gov/Footer/rulemaking

6. Signature

Rachel McCrea

Rachel McCrea
Water Quality Section Manager
Northwest Region Office

September 3, 2025

Date

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

September 24, 2025

Kyle Gebhardt
Strider Construction Co., Inc.
4721 Northwest Dr
Bellingham, WA 98226
Sent by email only: kyleg@striderconstruction.com

RE: Transfer of coverage under the Construction Stormwater General Permit

Permit number:	**WAR314883**	
Site Name:	**Harris Avenue Shipyard**	
Location:	**201 Harris Ave**	
	Bellingham, WA	**County: Whatcom**
Disturbed Acres:	**3.1**	

Dear Kyle Gebhardt:

The Washington State Department of Ecology (Ecology) received your request to transfer permit coverage under the Construction Stormwater General Permit (CSWGP). Our records have been updated to show Strider Construction Co., Inc. as responsible for permit coverage effective September 5, 2025.

Retain this letter as an official record of permit coverage for your site. You may keep your records in electronic format if you can easily access them from your construction site. You can get the CSWGP, permit forms, and other information at Ecology's CSWGP eCoverage Packet webpage[1]. Contact your Permit Administrator, listed below, if you want a copy of the CSWGP mailed to you. Please read the permit and contact Ecology if you have any questions.

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Electronic Discharge Monitoring Reports (WQWebDMR)
This permit requires you to submit monthly discharge monitoring reports (DMRs) electronically using Ecology's secure online system, WQWebDMR. To sign up for WQWebDMR visit our WQWebPortal guidance webpage[2]. If you have questions, contact the portal staff at (360) 407-7097 (Olympia area), or (800) 633-6193/option 3, or email WQWebPortal@ecy.wa.gov.

Annual Permit Fees
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Ecology Field Inspector Assistance
If you have questions regarding stormwater management at your construction site, please contact your Regional Inspector, Jen Baptist of Ecology's Bellingham Field Office at jen.baptist@ecy.wa.gov, or (564) 565-0327.

Questions or Additional Information
Ecology is here to help. Please review our Construction Stormwater General Permit webpage[4] for more information. If you have questions about the Construction Stormwater General Permit, please contact your Permit Administrator, Melinda Wilson at melinda.wilson@ecy.wa.gov or (360) 870-8290.

Sincerely,



Jeff Killelea, Manager
Permit and Technical Services Section
Water Quality Program

[2] https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance/WQWebPortal-guidance
[3] https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-quality-permits/Fees
[4] www.ecology.wa.gov/constructionstormwaterpermit

APPENDIX B

ASB Discharge Authorizations

Aspect
A Geosyntec Company

August 18, 2025

Mr. Steven Bucy
Industrial Wastewater Permits Unit
Washington State Department of Ecology
Department of Ecology Northwest Regional Office
15700 Dayton Avenue North, Shoreline, Washington

Re: Information for Port of Bellingham ASB NPDES Permit Condition S7
Request to Discharge Dewatering Water to ASB during Cleanup
Project No. AS210195-009-06

Dear Mr. Bucy:

This letter transmits information to satisfy condition S7 for non-routine and unanticipated discharges of water to the Port of Bellingham's (Port) Aerated Stabilization Basin (ASB) under their National Pollutant Discharge Elimination System (NPDES) permit for the facility. The permit condition S7 states:

> *"1. Beginning on the effective date of this permit, the Permittee is authorized to discharge wastewater to the ASB on a case-by-case basis if pre-approved by Ecology. Prior to any discharge, the Permittee must contact Ecology 30 days in advance and at a minimum provide the following information: …"*

Information to address each of the eight listed points is provided below.

a. **The proposed discharge location.** Water would be trucked from the cleanup site to a vault immediately adjacent to the ASB, from where it flows by gravity into the ASB.

b. **The nature of the activity that will generate the discharge.** The Port is undertaking cleanup of the Harris Avenue Shipyard Site (Site) in accordance with Washington State's Model Toxics Control Act (MTCA; Chapter 173-340 WAC) and under an Agreed Order between the Washington State Department of Ecology (Ecology) and the Port. The cleanup action includes demolition and removal of impervious pavements and selected structures, plus excavation and removal of an estimated 17,000 tons of contaminated soil (heavy metals primarily), followed by backfill with gravel borrow and crushed rock, with surface grading to achieve drainage, and construction of a new stormwater management system. One area of excavation (Cleanup Area 2) will be deep enough to extend beneath the water table, and thus require dewatering to allow excavation, handling, and off-site transportation of unsaturated soils. Dewatering of this deeper excavation is expected to generate most of the water to be discharged to the ASB. All water generated from excavation dewatering, or stormwater accumulating within lined material stockpile areas, will be collected, pre-treated to remove settleable solids and, if observed, sheens, and then transported to the ASB for discharge.

c. **Any alternatives to the discharge, such as reuse, storage, or recycling of the water.** Due to the nature of the water generated as a component of a MTCA cleanup, there are no reuse, storage, or recycling alternatives for management of the water generated during the cleanup.

d. **The total volume of the water expected to be discharged.** We estimate a total discharge volume of up to 80,000 gallons over a duration of roughly 3 months (September through November 2025). The majority of discharge would likely occur before the end of October 2025.

e. **Provide the most current tightness test results for conveyance piping from GP-West to the ASB.** A copy of the Memorandum documenting the most recent (August 2024) tightness testing is attached (Attachment 1).

f. **The results of chemical analysis of the water.** As stated above, the majority of water to be discharged is expected to be groundwater generated by dewatering of the Cleanup Area 2 excavation. Therefore, Attachment 2 presents tabulated historical groundwater quality data[1] collected over multiple sampling events from four monitoring wells (MW-02/02A[2], MW-07, MW-11, and MW-12) located proximate to that planned excavation as the most representative water quality data. The groundwater samples were analyzed for Site contaminants of concern as approved by Ecology's Toxics Cleanup Program. The table also includes data from other wells, but the data from the four representative wells are within annotated red rectangles.

g. **The date of proposed discharge and the rate at which the water will be discharged, in gallons per minute.** The cleanup action work is expected to be conducted from September through November 2025. No water discharge will occur prior to September 1. The excavation dewatering system discharge will be pre-treated on-site to remove settleable solids and petroleum sheen (if present) prior to pumping into a water truck(s) for hauling to the ASB. Any water containing total settleable solids greater than 100 milliliters per liter (ml/L) or with visible petroleum sheen must undergo additional treatment prior to hauling to the ASB. Discharge from the water truck into the ASB vault will be conducted in a manner to cause no structural damage to the Port's facilities.

h. **If the proposed discharge is to a municipal storm drain and is approved by the Department, the Permittee shall notify the municipality of the discharge.** No discharge to a municipal storm drain will occur.

Please contact Ben Howard at the Port (360-676-2500) or me (206-778-7022) if we can provide additional clarification regarding this information. Following your review of this letter, the Port requests written authorization for the requested discharge as soon as possible.

[1] Excerpted from Appendix C to the Site Remedial Investigation/Feasibility Study (Floyd|Snider, 2019).
[2] MW-02A was a replacement well for MW-02.

Sincerely,

Aspect consulting, A Geosyntec Company



Eric Marhofer, PE
Principal Environmental Engineer
eric.marhofer@geosyntec.com

Attachments: Attachment 1 – Memorandum Re: NPDES Permit WA0001091, Special Condition S4.A.a.2; Annual ASB Pipeline Tightness Test Results, August 1, 2024 (prepared by Blue Coast Engineering, September 3, 2024)

Attachment 2 –Tabulation of Representative Groundwater Quality Data (Table C.8, annotated, from Floyd|Snider, 2019)

cc: Ben Howard and Sam Shipp, Port of Bellingham

V:\210195 Harris Ave Shipyard Remedial Design\Deliverables\ASB Permit Condition Letter\Letter to satisfy ASB Permit Condition S7 - Harris upland cleanup.docx

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

September 25, 2025

Ben Howard
Port of Bellingham Environmental Project Manager
1801 Roeder Ave
Bellingham, WA, 98225-2257

RE: Authorization to discharge non-routine flows to ASB under NPDES permit condition S7

Dear Ben Howard,
Ecology has reviewed the information supplied regarding an anticipated discharge of dewatering water to the ASB, dated August 18. 2025. Prior to discharge to the ASB, the water will be treated for settleable solids and, if observed, sheens.

Ecology is requiring the Port of Bellingham to submit water quality characterization data for each wastewater truck discharge into the ASB to ensure that the discharge meets the limits established in S1 of the permit. The parameters of Dissolved Oxygen, pH, and Turbidity must be sampled. The results containing the date, volume, and sampling results of the discharge must be sent to Ecology within 15 days of each truck discharge.

The results should be sent via email to the permit manager, Steven Bucy at sbuc461@ecy.wa.gov.

Under these conditions, Ecology approves the temporary discharge for 90 days from receipt of this letter.

Sincerely,

Steven Bucy

Steven Bucy, Permit Manager
Industrial Wastewater Permits Unit – NWRO
Department of Ecology

By electronic mail

ECC: PARIS; Port of Bellingham GPWest -- WA0001091

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

December 1, 2025

Ben Howard
Port of Bellingham Environmental Project Manager
1801 Roeder Ave
Bellingham, WA, 98225-2257

RE: Authorization to discharge non-routine flows to ASB under NPDES permit condition S7

Dear Ben Howard,
Ecology has reviewed the information supplied regarding an anticipated discharge of a wastewater tank to the ASB, dated October 29, 2025.

Ecology approves the one time discharge within 30 days of receipt of this letter.
Notify Ecology when the discharge takes place and provide records of any observations at the time of discharge.

Sincerely,

Steven Bucy

Steven Bucy, Permit Manager
Industrial Wastewater Permits Unit – NWRO
Department of Ecology

By electronic mail

ECC: PARIS; Port of Bellingham GPWest -- WA0001091

Harris Ave Shipyard Upland Cleanup Action | Strider Construction Co, Inc. | Port of Bellingham

Month : October, 2025

Water Quality Tracker

Date	Time	Carrier	Disposal site	D.O.	P.H.	Turbidity	Visible sheen	settleable solid	Gallons	
12/3/25	8am	NWLT	ASB	8.23	7.5	9.88	NO	Ø	5,300	Process water
12/3/25	9:15am	NWLT	ASB	7.42	7.5	8.20	NO	Ø	5,300	
12/3/25	10:30am	NWLT	ASB	7.75	7.5	11.80	NO	Ø	4206	
12/3/25	10:40am	NWLT	ASB	9.83	8	15.88	NO	Ø	1,100	Storm water
12/14/25	8:50am	NWLT	ASB	9.78	7.2	5.20	NO	Ø	5,300	
12/14/25	10:10am	NWLT	ASB	9.79	8.4	14.40	NO	Ø	5,300	
12/14/25	11:20am	NWLT	ASB	9.70	8.4	14.20	NO	Ø	5,300	
12/14/25	12:30pm	NWLT	ASB	10.32	6.8	4	NO	Ø	5,300	
1/20/26	7:50am	NWLT	ASB	10.80	7.8	13.20	NO	Ø	5,300	
1/20/26	9:07am	NWLT	ASB	10.50	7.5	19.50	NO	Ø	5,300	
1/20/26	9:40am	NWLT	ASB	10.60	7.5	26.80	NO	Ø	5,300	
1/20/26	10:35am	NWLT	ASB	10.70	7.4	30.50	NO	Ø	5,300	
1/20/26	11:40am	NWLT	ASB	10.50	7.4	45	NO	Ø	500	

#100 8620 Holly Drive
Everett, WA 98208, USA
T: +1 425 356 2600
F: +1 425 356 2626

October 21, 2025

Matthew von der Ahe
Geosyntec Consultants
520 Pike St
Suite 2600
Seattle, WA 98101

Work Order: **EV25100058**

Laboratory Results for: **AQEA WO210007-02.01 WA-1**

Dear Matthew von der Ahe,

ALS Environmental received 1 sample(s) on Oct 14, 2025 for the analysis presented in the following report.

The analytical data provided relates directly to the samples received by ALS Environmental and for only the analyses requested. Results are expressed as "as received" unless otherwise noted.

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

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

Sincerely,

//SR//

Generated By: DORINDA.MCCORMICK
Shawn Robinson
Project Manager

Client: Geosyntec Consultants
Project: AQEA WO210007-02.01 WA-1
Work Order: EV25100058

SAMPLE SUMMARY

Lab Samp ID	Client Sample ID	Matrix	TagNo	Collection Date	Date Received	Hold
EV25100058-01	SW-T-20251014	Water		14-Oct-2025 09:20	14-Oct-2025 11:15	☐

RIGHT SOLUTIONS | RIGHT PARTNER

Client: Geosyntec Consultants **CASE NARRATIVE**
Project: AQEA WO210007-02.01 WA-1
Work Order: EV25100058

Metals by Method EPA-7470

Batch ID: R524251

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

Metals by Method EPA-6020

Batch ID: 234225

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

- P

Subcontracted by Method MISC

Batch ID: R524454

- The test results meet requirements of the current NELAP standards, state requirements or programs where applicable.

RIGHT SOLUTIONS | RIGHT PARTNER

Client: Geosyntec Consultants
Project: AQEA WO210007-02.01 WA-1
Sample ID: SW-T-20251014
Collection Date: 14-Oct-2025 09:20

ANALYTICAL REPORT
WorkOrder:EV25100058
Lab ID:EV25100058-01
Matrix:Water

ANALYSES	RESULT	QUAL	REPORT LIMIT	UNITS	DILUTION FACTOR	DATE ANALYZED
TPH-GASOLINE BY NWTPH-GX		**Method:NWTPH-GX**		Prep:EPA-8021 / 15-Oct-2025		Analyst: MNC
TPH-Volatile Range	ND		50	UG/L	1	15-Oct-2025 16:43
Surr: TFT	*89.4*		*60-140*	*%REC*	*1*	*15-Oct-2025 16:43*
ICP/MS METALS ANALYSIS BY EPA-200.8		**Method:EPA-6020**		Prep:EPA 3010 / 15-Oct-2025		Analyst: EBS
Arsenic	ND		1.0	UG/L	1	15-Oct-2025 16:49
Barium	**350**		**1.0**	**UG/L**	1	15-Oct-2025 16:49
Cadmium	ND		1.0	UG/L	1	15-Oct-2025 16:49
Chromium	ND		2.0	UG/L	1	15-Oct-2025 16:49
Copper	**65**		**2.0**	**UG/L**	1	15-Oct-2025 16:49
Lead	**3.3**		**1.0**	**UG/L**	1	15-Oct-2025 16:49
Selenium	ND		4.0	UG/L	1	15-Oct-2025 16:49
Silver	ND		1.0	UG/L	1	15-Oct-2025 16:49
Zinc	**65**		**2.5**	**UG/L**	1	15-Oct-2025 16:49
CV MERCURY ANALYSIS BY EPA-245.1		**Method:EPA-7470**		Prep:EPA 3010		Analyst: RAL
Mercury	ND		0.20	UG/L	1	17-Oct-2025 13:48
ENVIRONMENTAL ANALYSIS		**Method:MISC**				Analyst: CAS
Miscellaneous Analysis	See Attached			UG/L	1	20-Oct-2025 09:25

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

RIGHT SOLUTIONS | RIGHT PARTNER

Client: Geosyntec Consultants
Project: AQEA WO210007-02.01 WA-1
WorkOrder: EV25100058

DATES REPORT

Sample ID	Client Samp ID	Collection Date	Leachate Date	Prep Date	Analysis Date	DF
Batch ID: 234225 (0)	**Test Name :** ICP/MS METALS ANALYSIS BY EPA-200.8				**Matrix:** Water	
EV25100058-01	SW-T-20251014	14 Oct 2025 09:20		15 Oct 2025 10:00	15 Oct 2025 16:49	1
Batch ID: 234296 (0)	**Test Name :** TPH-GASOLINE BY NWTPH-GX				**Matrix:** Water	
EV25100058-01	SW-T-20251014	14 Oct 2025 09:20		15 Oct 2025 08:00	15 Oct 2025 16:43	1
Batch ID: R524251 (0)	**Test Name :** CV MERCURY ANALYSIS BY EPA-245.1				**Matrix:** Water	
EV25100058-01	SW-T-20251014	14 Oct 2025 09:20			17 Oct 2025 13:48	1
Batch ID: R524454 (0)	**Test Name :** ENVIRONMENTAL ANALYSIS				**Matrix:** Water	
EV25100058-01	SW-T-20251014	14 Oct 2025 09:20			20 Oct 2025 09:25	1

RIGHT SOLUTIONS | RIGHT PARTNER

Client: Geosyntec Consultants
Project: AQEA WO210007-02.01 WA-1
WorkOrder: EV25100058

QC BATCH REPORT

Batch ID: 234296 (0) **Instrument: GBTEX_119** **Method: TPH-GASOLINE BY NWTPH-GX**

MBLK Sample ID: **MBG-101525W** Units: **UG/L** Analysis Date: **15-Oct-2025 13:15**
Client ID: Run ID: **GBTEX_119_524134** SeqNo: **9085771** PrepDate: **15-Oct-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
TPH-Volatile Range	ND	50								
Surr: TFT	*7.723*	*0*	*10*	*0*	*77.2*	*60 - 140*				

LCS Sample ID: **BG-101525W** Units: **UG/L** Analysis Date: **15-Oct-2025 14:33**
Client ID: Run ID: **GBTEX_119_524134** SeqNo: **9085774** PrepDate: **15-Oct-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
TPH-Volatile Range	515.9	50	500	0	103	66.5 - 122.7				
Surr: TFT	*9.477*	*0*	*10*	*0*	*94.8*	*60 - 140*				

LCSD Sample ID: **BGD-101525W** Units: **UG/L** Analysis Date: **15-Oct-2025 14:59**
Client ID: Run ID: **GBTEX_119_524134** SeqNo: **9085775** PrepDate: **15-Oct-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
TPH-Volatile Range	531.4	50	500	0	106	66.5 - 122.7	515.9	2.95	15	
Surr: TFT	*8.835*	*0*	*10*	*0*	*88.4*	*60 - 140*	*9.477*	*7.01*	*25*	

The following samples were analyzed in this batch:

RIGHT SOLUTIONS | RIGHT PARTNER

Client: Geosyntec Consultants
Project: AQEA WO210007-02.01 WA-1
WorkOrder: EV25100058

QC BATCH REPORT

Batch ID: 234225 (0) **Instrument: ICPMS_130** **Method: ICP/MS METALS ANALYSIS BY EPA-200.8**

MBLK Sample ID: **MB-101525W** Units: **UG/L** Analysis Date: **15-Oct-2025 15:35**
Client ID: Run ID: **ICPMS_130_524172** SeqNo: **9086768** PrepDate: **15-Oct-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit Qual
Arsenic	ND	1.0				0 - 1			
Barium	ND	1.0				0 - 1			
Cadmium	ND	1.0				0 - 1			
Chromium	ND	2.0				0 - 2			
Copper	ND	2.0				0 - 2			
Lead	ND	1.0				0 - 1			
Selenium	ND	4.0				0 - 4			
Silver	ND	1.0				0 - 1			
Zinc	ND	2.5				0 - 2.5			

LCS Sample ID: **BS-101525W** Units: **UG/L** Analysis Date: **15-Oct-2025 15:39**
Client ID: Run ID: **ICPMS_130_524172** SeqNo: **9086769** PrepDate: **15-Oct-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit Qual
Arsenic	119.6	1.0	125	0	95.7	89.1 - 110			
Barium	120	1.0	125	0	96.0	88.5 - 108			
Cadmium	126.7	1.0	125	0	101	89.4 - 110			
Chromium	125.6	2.0	125	0	100	88.3 - 110.2			
Copper	129.3	2.0	125	0	103	85.4 - 109			
Lead	119.7	1.0	125	0	95.7	87.5 - 107			
Selenium	117.5	4.0	125	0	94.0	90.2 - 113			
Silver	135.1	1.0	125	0	108	80 - 120			
Zinc	123.3	2.5	125	0	98.6	88.2 - 111			

RIGHT SOLUTIONS | RIGHT PARTNER

Client: Geosyntec Consultants
Project: AQEA WO210007-02.01 WA-1
WorkOrder: EV25100058

QC BATCH REPORT

Batch ID: 234225 (0) **Instrument: ICPMS_130** **Method: ICP/MS METALS ANALYSIS BY EPA-200.8**

LCSD Sample ID: **BSD-101525W** Units: **UG/L** Analysis Date: **15-Oct-2025 15:42**
Client ID: Run ID: **ICPMS_130_524172** SeqNo: **9086770** PrepDate: **15-Oct-2025** DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Arsenic	120.3	1.0	125	0	96.2	89.1 - 110	119.6	0.546	10	
Barium	121.2	1.0	125	0	97.0	88.5 - 108	120	1.04	10	
Cadmium	128.7	1.0	125	0	103	89.4 - 110	126.7	1.57	10	
Chromium	125.2	2.0	125	0	100	88.3 - 110.2	125.6	0.359	10	
Copper	131.6	2.0	125	0	105	85.4 - 109	129.3	1.79	10	
Lead	121.5	1.0	125	0	97.2	87.5 - 107	119.7	1.54	10	
Selenium	120	4.0	125	0	96.0	90.2 - 113	117.5	2.15	10	
Silver	137.7	1.0	125	0	110	80 - 120	135.1	1.9	10	
Zinc	128.4	2.5	125	0	103	88.2 - 111	123.3	4.1	10	

The following samples were analyzed in this batch:

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Client: Geosyntec Consultants
Project: AQEA WO210007-02.01 WA-1
WorkOrder: EV25100058

QC BATCH REPORT

Batch ID: R524251 (0) **Instrument: CVHG_95** **Method: CV MERCURY ANALYSIS BY EPA-245.1**

MBLK Sample ID: **MBLK-R524251** Units: **UG/L** Analysis Date: **17-Oct-2025 13:48**
Client ID: Run ID: **CVHG_95_524251** SeqNo: **9088909** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	ND	0.20								

LCS Sample ID: **LCS-R524251** Units: **UG/L** Analysis Date: **17-Oct-2025 13:48**
Client ID: Run ID: **CVHG_95_524251** SeqNo: **9088908** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	102	0.20	100	0	102	80.6 - 118				

LCSD Sample ID: **LCSD-R524251** Units: **UG/L** Analysis Date: **17-Oct-2025 13:48**
Client ID: Run ID: **CVHG_95_524251** SeqNo: **9088907** PrepDate: DF: **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Mercury	101	0.20	100	0	101	80.6 - 118	102	0.985	7.94	

The following samples were analyzed in this batch:

RIGHT SOLUTIONS | RIGHT PARTNER

Client: Geosyntec Consultants
Project: AQEA WO210007-02.01 WA-1
WorkOrder: **EV25100058**

QUALIFIERS, ACRONYMS, UNITS

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

Acronym	Description
DCS	Detectability Check Study
DUP	Method Duplicate
LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MBLK	Method Blank
MDL	Method Detection Limit
MQL	Method Quantitation Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
PDS	Post Digestion Spike
PQL	Practical Quantitaion Limit
SD	Serial Dilution
SDL	Sample Detection Limit
TRRP	Texas Risk Reduction Program

RIGHT SOLUTIONS | RIGHT PARTNER

Data Qualifiers

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

RIGHT SOLUTIONS | RIGHT PARTNER

Sample Receipt Checklist

Work Order ID: EV25100058 **Date/Time Received:** **14-Oct-2025 11:15**

Client Name: GEO12-SEATTLE **Received by:** **ALS Everett**

Completed By: */S/ Dorinda McCormick* 14-Oct-2025 09:15 **Reviewed by:** _____ _____

eSignature Date/Time eSignature Date/Time

Matrices: **water** Carrier name: **ALS Courier**

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	Not Present ☑
Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
VOA/TX1005/TX1006 Solids in hermetically sealed vials?	Yes ☐	No ☐	Not Present ☑
Chain of custody present?	Yes ☑	No ☐	
Chain of custody signed when relinquished and received?	Yes ☑	No ☐	
Samplers name present on COC?	Yes ☐	No ☑	
Chain of custody agrees with sample labels?	Yes ☑	No ☐	
Samples in proper container/bottle?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	
All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature in compliance?	Yes ☐	No ☑	
Temperature(s)/Thermometer(s):	1.7 c on ice	190	
Cooler(s)/Kit(s):			
Date/Time sample(s) sent to storage:			
Water - VOA vials have zero headspace?	Yes ☐	No ☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	Yes ☑	No ☐	N/A ☐
pH adjusted?	Yes ☐	No ☑	N/A ☐
pH adjusted by:			

Login Notes:

Client Contacted: Date Contacted: Person Contacted:

Contacted By: Regarding:

Comments:

Corrective Action:

RIGHT SOLUTIONS | RIGHT PARTNER

ALS Environmental
8620 Holly Drive, Suite 100
Everett, WA 98208
Phone (425) 356-2600
Fax (425) 356-2626
http://www.alsglobal.com

Chain Of Custody/ Laboratory Analysis Request

EV25100058

Date _____ Page _____ Of _____

PROJECT ID:	AQEA W0210007-02.01 WA-1
REPORT TO COMPANY:	Geosyntec
PROJECT MANAGER:	Matthew vander Ahe
ADDRESS:	data@aspectconsulting.com
	hanaa.winter@geosyntec.com
PHONE:	P.O. #:
E-MAIL:	
INVOICE TO COMPANY:	Anchor QEA
ATTENTION:	Gavin Casson
ADDRESS:	

ANALYSIS REQUESTED

OTHER (Specify)

SAMPLE I.D.	DATE	TIME	TYPE	LAB#	NWTPH-HCID	NWTPH-DX	NWTPH-GX	BTEX by EPA 8021 ☐	BTEX by EPA 8260 ☐	MTBE by EPA 8021 ☐	MTBE by EPA 8260 ☐	Halogenated Volatiles by EPA 8260	Volatile Organic Compounds by EPA 8260	EDB / EDC by EPA 8260 SIM (water)	EDB / EDC by EPA 8260 (soil)	Semivolatile Organic Compounds by EPA 8270	Polycyclic Aromatic Hydrocarbons (PAH) by EPA 8270 SIM	PCB by EPA 8082 ☒	Pesticides by EPA 8081 ☐	Metals-MTCA-5 ☐	RCRA-8 ☒	PH Pol ☐	TAL ☐	Metals Other (Specify) Cu, Zn	TCLP-Metals ☐	VOA ☐	Semi-Vol ☐	Pest ☐	Herbs ☐	cPAHs								NUMBER OF CONTAINERS	RECEIVED IN GOOD CONDITION?
1. SW-T-20251014	10-14-25	0920				X	X											X		X				X						X								9	
2.																																							
3.																																							
4.																																							
5.																																							
6.																																							
7.																																							
8.																																							
9.																																							
10.																																							

SPECIAL INSTRUCTIONS

SIGNATURES (Name, Company, Date, Time):

1. Relinquished By: Scott Colegrossi, Geosyntec, 10-14-25, 1115
   Received By: Mark Berg, ALS 10/14/2025 11:17a
2. Relinquished By: _____
   Received By: _____

TURNAROUND REQUESTED in Business Days*

Organic, Metals & Inorganic Analysis
10 (Standard) | 5 | 3 | 2 | 1 | SAME DAY

Fuels & Hydrocarbon Analysis
5 (Standard) | 3 | 1 | SAME DAY

OTHER:
Specify: (5) day or sooner

1.7°C
ON ICE

*Turnaround request less than standard may incur Rush Charges

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ALS Laboratory Group
ANALYTICAL CHEMISTRY & TESTING SERVICES

SAMPLE RECEIVING CHECKLIST

Client: GeoSyntec
Project: AQETA W0210007-0201 WA-1

ALS Job #: EV2510005B
Login Date: 10/14/2025
Login Time: 1115
Login By: DHM

Type of Shipping Container: ☒ Cooler ☐ Box ☐ Other: _____

Shipped Via: ☐ FedEx Ground ☐ FedEx Express ☐ UPS ☐ External Courier ☒ ALS Courier ☐ Hand Delivered

	Yes	No	N/A
Were custody seals on the outside of the shipping container?	☐	☐	☒
How Many? ____ Where? _____ Date: _____ Name: _____			
Was CoC filled out properly? (in ink, signed, dated, etc.)	☒	☐	☐
Did all bottles have labels?	☒	☐	☐
Did all bottle labels and tags agree with CoC?	☒	☐	☐
Were samples received within hold time?	☒	☐	☐
Did all bottles arrive in good condition?	☒	☐	☐
Was sufficient amount of sample sent for tests requested?	☒	☐	☐
Was correct preservation added to samples?	☒	☐	☐
Subcontract test containers added to subcontract bin?	☒	☐	☐
Wetchem test containers marked with applicable tests?	☐	☐	☒
Short hold time test containers delivered to analysts?	☐	☐	☒
VOA vials checked for bubbles?	☒	☐	☐
Bubbles in sample number(s): NONE (1)			
5035A kits received?	☐	☒	☐
Low kits: _____ High kits: _____			
5035A kits returned?	☐	☒	☐
Low kits: _____ High kits: _____			

Temperature upon receipt: 1.7 °C On ice? ☒ Y ☐ N Thermometer ID: 190

Other discrepancies:

Was client contacted? _____ Who was called? _____ By whom? _____ Date: _____
Outcome of call:

ALS Environmental – Everett
8620 Holly Dr. STE 100
Everett, WA 98012
(425) 356 - 2600

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October 20, 2025 Service Request No:K2510257

Shawn Robinson
ALS Environmental
8620 Holly Drive #100
Everett, WA 98208

Laboratory Results for: EV25100058

Dear Shawn,

Enclosed are the results of the sample(s) submitted to our laboratory October 15, 2025
For your reference, these analyses have been assigned our service request number **K2510257.**

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at www.alsglobal.com. All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3301. You may also contact me via email at Naomi.Pedersen@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

Naomi Pedersen
Project Manager

ADDRESS 1317 S. 13th Avenue, Kelso, WA 98626
PHONE +1 360 577 7222 | FAX +1 360 636 1068
ALS Group USA, Corp.
dba ALS Environmental

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Narrative Documents

ALS Environmental—Kelso Laboratory
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Phone (360) 577-7222 Fax (360) 425-9096
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Client: ALS Environmental - US
Project: EV25100058
Sample Matrix: Water

Service Request: K2510257
Date Received: 10/15/2025

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples for the Tier II level requested by the client.

Sample Receipt:

One water sample was received for analysis at ALS Environmental on 10/15/2025. Any discrepancies upon initial sample inspection are annotated on the sample receipt and preservation form included within this report. The samples were stored at minimum in accordance with the analytical method requirements.

Semivolatiles by GC/MS:

Method 8270E, 10/20/2025:The detection limit for all analytes for sample SW-T-20251014 was elevated due to less than optimal sample volume available for analysis.

Semivoa GC:

The reporting limit was slightly elevated for all analytes in sample SW-T-20251014 due to the sample extract not being able to be concentrated to the final volume necessary to achieve target detection limits.

Approved by _____ Date 10/20/2025

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SAMPLE DETECTION SUMMARY

This form includes only detections above the reporting levels. For a full listing of sample results, continue to the Sample Results section of this Report.

CLIENT ID: SW-T-20251014			Lab ID: K2510257-001			
Analyte	**Results**	**Flag**	**MDL**	**MRL**	**Units**	**Method**
Diesel Range Organics (C12 - C25 DRO)	320	Y		270	ug/L	NWTPH-Dx

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Sample Receipt Information

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Phone (360) 577-7222 Fax (360) 425-9096
www.alsglobal.com

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SAMPLE CROSS-REFERENCE

SAMPLE #	CLIENT SAMPLE ID	DATE	TIME
K2510257-001	SW-T-20251014	10/14/2025	0920

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K2510257

8620 Holly Drive
Suite 100
Everett, WA 98208
T: +1 425 356 2600
F: +1 425 356 2626
www.alsglobal.com

Subcontract Chain of Custody

SAMPLING STATE: **Washington** **COC ID:** **29655**

SUBCONTRACT TO:

ALS Environmental Kelso
1317 S. 13th Avenue
Kelso, WA 98626

Phone: +1 360 501 3312

CUSTOMER INFORMATION:

Company:	ALS Everett
Contact:	Shawn Robinson
Address:	8620 Holly DriveSuite 100
Phone:	+1 425 356 2600
Email:	shawn.robinson@alsglobal.com
Alternate Contact:	Dorinda McCormick
Email:	dorinda.mccormick@alsglobal.com

INVOICE INFORMATION:

Company:	ALS Everett
Contact:	Accounts Payable
Address:	8620 Holly DriveSuite 100
Phone:	+1 425 356 2600
Reference:	EV25100058
TSR:	Everett-House Accounts

	LAB SAMPLE ID	CLIENT SAMPLE ID	MATRIX	COLLECT DATE
	ANALYSIS REQUESTED			DUE DATE
1.	**EV25100058-01**	**SW-T-20251014**	**Water**	**14 Oct 2025 09:20**
	PCBs by 8082, cPAHs by 8270 SIM, NWTPH-DX			21 Oct 2025

Comments: RUSH ASAP TURN, 5-Day marked but client needs ASAP
Please email results and EDD to: USAEnviro.Everett@ALSGlobal.com
Please email EDD.
PO:32-Ev25100058
Client is Geosyntec

QC Level: STD (Standard)

Relinquished By: _____ Date/Time: 10/15/2025 08:32AM

Received By: _____ Date/Time: 10-15-25 1400

Cooler ID(s): _____ Temperature(s): _____

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Cooler Receipt and Preservation Form

PM NP

Client Everett Service Request K25 10257

Received: 10-15-25 Opened: 10-15-25 By: AR Unloaded: 10-15-25 By: AR

1. Samples were received via? *USPS* *Fed Ex* *UPS* *DHL* *PDX* *(Courier)* *Hand Delivered*
2. Samples were received in: (circle) *(Cooler)* *Box* *Envelope* *Other*_____ *NA*
3. Were custody seals on coolers? NA Y (N) If yes, how many and where? _____
   If present, were custody seals intact? Y N If present, were they signed and dated? Y N

Temp Blank	Sample Temp	IR Gun	Cooler #/COC ID / NA	Out of temp indicate with "X"	PM Notified If out of temp	Tracking Number (NA)	Filed
✓	2.7	IR-02	296955				

4. Was a Temperature Blank present in cooler? NA Y (N) If yes, notate the temperature in the appropriate column below:
   If no, take the temperature of a representative sample bottle contained within the cooler; notate in the column "Sample Temp":
5. Were samples received within the method specified temperature ranges? NA (Y) N
   If no, were they received on ice and same day as collected? If not, notate the cooler # below and notify the PM. (NA) Y N

If applicable, tissue samples were received: *Frozen* *Partially Thawed* *Thawed*

6. Packing material: *Inserts* *(Baggies)* *Bubble Wrap* *Gel Packs* *(Wet Ice)* *Dry Ice* *Sleeves* _____
7. Were custody papers properly filled out (ink, signed, etc.)? NA (Y) N
8. Were samples received in good condition (unbroken) NA (Y) N
9. Were all sample labels complete (ie, analysis, preservation, etc.)? NA (Y) N
10. Did all sample labels and tags agree with custody papers? NA (Y) N
11. Were appropriate bottles/containers and volumes received for the tests indicated? NA (Y) N
12. Were the pH-preserved bottles (*see SMO GEN SOP*) received at the appropriate pH? *Indicate in the table below* (NA) Y N
13. Were VOA vials received without headspace? *Indicate in the table below.* (NA) Y N
14. Was C12/Res negative? NA (Y) N
15. Were samples received within method specified time limit? If not, notate the error below and notify the PM. (NA) Y N
16. Were 100mL sterile microbiology bottles filled exactly to the 100mL mark? (NA) Y N Underfilled Overfilled

Sample ID on Bottle	Sample ID on COC	Identified by:

Sample ID	Bottle Count Bottle Type	Head-space	Broke	pH	Reagent	Volume added	Reagent Lot Number	Initials	Time

Notes, Discrepancies, Resolutions: _____

RUSH

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Miscellaneous Forms

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Inorganic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
E	The result is an estimate amount because the value exceeded the instrument calibration range.
J	The result is an estimated value.
U	The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL. *DOD-QSM 4.2 definition* : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
i	The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
X	See case narrative.
Q	See case narrative. One or more quality control criteria was outside the limits.
H	The holding time for this test is immediately following sample collection. The samples were analyzed as soon as possible after receipt by the laboratory.

Metals Data Qualifiers

#	The control limit criteria is not applicable.
J	The result is an estimated value.
E	The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
M	The duplicate injection precision was not met.
N	The Matrix Spike sample recovery is not within control limits. See case narrative.
S	The reported value was determined by the Method of Standard Additions (MSA).
U	The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL. *DOD-QSM 4.2 definition* : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
W	The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
i	The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
X	See case narrative.
+	The correlation coefficient for the MSA is less than 0.995.
Q	See case narrative. One or more quality control criteria was outside the limits.

Organic Data Qualifiers

*	The result is an outlier. See case narrative.
#	The control limit criteria is not applicable. See case narrative.
A	A tentatively identified compound, a suspected aldol-condensation product.
B	The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
C	The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
D	The reported result is from a dilution.
E	The result is an estimated value over the calibration range.
J	The result is an estimated value between the MDL and the MRL.
N	The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
P	The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results.
U	The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL. *DOD-QSM 4.2 definition* : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
i	The MRL/MDL or LOQ/LOD is elevated due to a chromatographic interference.
X	See case narrative.
Q	See case narrative. One or more quality control criteria was outside the limits.

Additional Petroleum Hydrocarbon Specific Qualifiers

F	The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
L	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
H	The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
O	The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
Y	The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
Z	The chromatographic fingerprint does not resemble a petroleum product.

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ALS Group USA Corp. dba ALS Environmental (ALS) - Kelso
State Certifications, Accreditations, and Licenses

Agency	Web Site	Number
Alaska DEH	http://dec.alaska.gov/eh/lab/cs/csapproval.htm	UST-040
Arizona DHS	http://www.azdhs.gov/lab/license/env.htm	AZ0339
Arkansas - DEQ	http://www.adeq.state.ar.us/techsvs/labcert.htm	88-0637
California DHS (ELAP)	http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx	2795
DOD ELAP	http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm	L16-58-R4
Florida DOH	http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm	E87412
Hawaii DOH	http://health.hawaii.gov/	-
ISO 17025	http://www.pjlabs.com/	L16-57
Louisiana DEQ	http://www.deq.louisiana.gov/page/la-lab-accreditation	03016
Maine DHS	http://www.maine.gov/dhhs/	WA01276
Minnesota DOH	http://www.health.state.mn.us/accreditation	053-999-457
Nevada DEP	http://ndep.nv.gov/bsdw/labservice.htm	WA01276
New Jersey DEP	http://www.nj.gov/dep/enforcement/oqa.html	WA005
New York - DOH	https://www.wadsworth.org/regulatory/elap	12060
North Carolina DEQ	https://deq.nc.gov/about/divisions/water-resources/water-resources-data/water-sciences-home-page/laboratory-certification-branch/non-field-lab-certification	605
Oklahoma DEQ	http://www.deq.state.ok.us/CSDnew/labcert.htm	9801
Oregon – DEQ (NELAP)	http://public.health.oregon.gov/LaboratoryServices/EnvironmentalLaboratoryAccreditation/Pages/index.aspx	WA100010
South Carolina DHEC	http://www.scdhec.gov/environment/EnvironmentalLabCertification/	61002
Texas CEQ	http://www.tceq.texas.gov/field/qa/env_lab_accreditation.html	T104704427
Washington DOE	http://www.ecy.wa.gov/programs/eap/labs/lab-accreditation.html	C544
Wyoming (EPA Region 8)	https://www.epa.gov/region8-waterops/epa-region-8-certified-drinking-water-	-
Kelso Laboratory Website	www.alsglobal.com	NA

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. A complete listing of specific NELAP-certified analytes, can be found in the certification section at www.ALSGlobal.com or at the accreditation bodies web site.
Please refer to the certification and/or accreditation body's web site if samples are submitted for compliance purposes. The states highlighted above, require the analysis be listed on the state certification if used for compliance purposes and if the method/anlayte is offered by that state.

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Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LOD	Limit of Detection
LOQ	Limit of Quantitation
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

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Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058/		

Sample Name:	SW-T-20251014	**Date Collected:**	10/14/25
Lab Code:	K2510257-001	**Date Received:**	10/15/25
Sample Matrix:	Water		

Analysis Method	Extracted/Digested By	Analyzed By
8082A	VWILSON	JDEMERS
8270E	JCHRISTENSEN	EBRUNO
NWTPH-Dx	LSWATOSH	JDEMERS

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Sample Results

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Semivolatile Organic Compounds by GC/MS

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Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Collected:**	10/14/25 09:20
Sample Matrix:	Water	**Date Received:**	10/15/25 14:00
Sample Name:	SW-T-20251014	**Units:**	ug/L
Lab Code:	K2510257-001	**Basis:**	NA

Polycyclic Aromatic Hydrocarbons by GC/MS SIM

Analysis Method: 8270E
Prep Method: EPA 3510C

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Benz(a)anthracene	ND U	0.040	1	10/20/25 09:25	10/16/25	
Benzo(a)pyrene	ND U	0.040	1	10/20/25 09:25	10/16/25	
Benzo(b)fluoranthene	ND U	0.040	1	10/20/25 09:25	10/16/25	
Benzo(k)fluoranthene	ND U	0.040	1	10/20/25 09:25	10/16/25	
Chrysene	ND U	0.040	1	10/20/25 09:25	10/16/25	
Dibenz(a,h)anthracene	ND U	0.040	1	10/20/25 09:25	10/16/25	
Indeno(1,2,3-cd)pyrene	ND U	0.040	1	10/20/25 09:25	10/16/25	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Fluorene-d10	85	42 - 131	10/20/25 09:25	
p-Terphenyl-d14	76	32 - 129	10/20/25 09:25	

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Semivolatile Organic Compounds by GC

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Analytical Report

Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Collected:**	10/14/25 09:20
Sample Matrix:	Water	**Date Received:**	10/15/25 14:00
Sample Name:	SW-T-20251014	**Units:**	ug/L
Lab Code:	K2510257-001	**Basis:**	NA

Low Level Polychlorinated Biphenyls (PCBs) by GC

Analysis Method: 8082A
Prep Method: EPA 3511

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Aroclor 1016	ND U	0.0075	1	10/17/25 15:56	10/17/25	
Aroclor 1221	ND U	0.015	1	10/17/25 15:56	10/17/25	
Aroclor 1232	ND U	0.0075	1	10/17/25 15:56	10/17/25	
Aroclor 1242	ND U	0.0075	1	10/17/25 15:56	10/17/25	
Aroclor 1248	ND U	0.0075	1	10/17/25 15:56	10/17/25	
Aroclor 1254	ND U	0.0075	1	10/17/25 15:56	10/17/25	
Aroclor 1260	ND U	0.0075	1	10/17/25 15:56	10/17/25	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Decachlorobiphenyl	57	10 - 140	10/17/25 15:56	

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Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Collected:**	10/14/25 09:20
Sample Matrix:	Water	**Date Received:**	10/15/25 14:00
Sample Name:	SW-T-20251014	**Units:**	ug/L
Lab Code:	K2510257-001	**Basis:**	NA

Semi-Volatile Petroleum Products by GC/FID

Analysis Method: NWTPH-Dx
Prep Method: EPA 3510C

Analyte Name	Result		MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (C12 - C25 DRO)	**320**	**Y**	270	1	10/17/25 14:10	10/16/25	
Residual Range Organics (C25 - C36 RRO)	ND	U	540	1	10/17/25 14:10	10/16/25	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	74	50 - 150	10/17/25 14:10	
n-Triacontane	78	50 - 150	10/17/25 14:10	

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QC Summary Forms

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Semivolatile Organic Compounds by GC/MS

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www.alsglobal.com

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Client: ALS Environmental - US **Service Request:** K2510257
Project: EV25100058
Sample Matrix: Water

SURROGATE RECOVERY SUMMARY
Polycyclic Aromatic Hydrocarbons by GC/MS SIM

Analysis Method: 8270E
Extraction Method: EPA 3510C

Sample Name	Lab Code	Fluorene-d10 42 - 131	p-Terphenyl-d14 32 - 129
SW-T-20251014	K2510257-001	85	76
Method Blank	KQ2518302-01	93	94
Lab Control Sample	KQ2518302-02	89	96
Duplicate Lab Control Sample	KQ2518302-03	76	82

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Analytical Report

Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA
Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KQ2518302-01	**Basis:**	NA

Polycyclic Aromatic Hydrocarbons by GC/MS SIM

Analysis Method: 8270E
Prep Method: EPA 3510C

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Benz(a)anthracene	ND U	0.020	1	10/20/25 08:03	10/16/25	
Benzo(a)pyrene	ND U	0.020	1	10/20/25 08:03	10/16/25	
Benzo(b)fluoranthene	ND U	0.020	1	10/20/25 08:03	10/16/25	
Benzo(k)fluoranthene	ND U	0.020	1	10/20/25 08:03	10/16/25	
Chrysene	ND U	0.020	1	10/20/25 08:03	10/16/25	
Dibenz(a,h)anthracene	ND U	0.020	1	10/20/25 08:03	10/16/25	
Indeno(1,2,3-cd)pyrene	ND U	0.020	1	10/20/25 08:03	10/16/25	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Fluorene-d10	93	42 - 131	10/20/25 08:03	
p-Terphenyl-d14	94	32 - 129	10/20/25 08:03	

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Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Analyzed:**	10/20/25
Sample Matrix:	Water	**Date Extracted:**	10/16/25

Duplicate Lab Control Sample Summary
Polycyclic Aromatic Hydrocarbons by GC/MS SIM

Analysis Method:	8270E	**Units:**	ug/L
Prep Method:	EPA 3510C	**Basis:**	NA
		Analysis Lot:	897485

	Lab Control Sample KQ2518302-02			Duplicate Lab Control Sample KQ2518302-03					
Analyte Name	**Result**	**Spike Amount**	**% Rec**	**Result**	**Spike Amount**	**% Rec**	**% Rec Limits**	**RPD**	**RPD Limit**
Benz(a)anthracene	2.50	2.50	100	2.26	2.50	90	74-124	10	30
Benzo(a)pyrene	2.34	2.50	93	2.10	2.50	84	75-131	11	30
Benzo(b)fluoranthene	2.36	2.50	94	2.11	2.50	84	73-136	11	30
Benzo(k)fluoranthene	2.15	2.50	86	1.87	2.50	75	74-134	14	30
Chrysene	2.31	2.50	92	2.10	2.50	84	74-132	10	30
Dibenz(a,h)anthracene	2.15	2.50	86	1.89	2.50	75	59-135	13	30
Indeno(1,2,3-cd)pyrene	2.39	2.50	96	2.11	2.50	84	63-136	12	30

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Semivolatile Organic Compounds by GC

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360) 577-7222 Fax (360) 425-9096
www.alsglobal.com

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Client: ALS Environmental - US **Service Request:** K2510257
Project: EV25100058
Sample Matrix: Water

SURROGATE RECOVERY SUMMARY
Low Level Polychlorinated Biphenyls (PCBs) by GC

Analysis Method: 8082A
Extraction Method: EPA 3511

Sample Name	Lab Code	Decachlorobiphenyl 10 - 140
SW-T-20251014	K2510257-001	57
Method Blank	KQ2518376-01	73
Lab Control Sample	KQ2518376-02	76
Duplicate Lab Control Sample	KQ2518376-03	73

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Analytical Report

Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA
Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KQ2518376-01	**Basis:**	NA

Low Level Polychlorinated Biphenyls (PCBs) by GC

Analysis Method: 8082A
Prep Method: EPA 3511

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Aroclor 1016	ND U	0.0050	1	10/17/25 14:20	10/17/25	
Aroclor 1221	ND U	0.010	1	10/17/25 14:20	10/17/25	
Aroclor 1232	ND U	0.0050	1	10/17/25 14:20	10/17/25	
Aroclor 1242	ND U	0.0050	1	10/17/25 14:20	10/17/25	
Aroclor 1248	ND U	0.0050	1	10/17/25 14:20	10/17/25	
Aroclor 1254	ND U	0.0050	1	10/17/25 14:20	10/17/25	
Aroclor 1260	ND U	0.0050	1	10/17/25 14:20	10/17/25	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Decachlorobiphenyl	73	10 - 140	10/17/25 14:20	

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Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Analyzed:**	10/17/25
Sample Matrix:	Water	**Date Extracted:**	10/17/25

Duplicate Lab Control Sample Summary
Low Level Polychlorinated Biphenyls (PCBs) by GC

Analysis Method:	8082A	**Units:**	ug/L
Prep Method:	EPA 3511	**Basis:**	NA
		Analysis Lot:	897520

	Lab Control Sample KQ2518376-02			Duplicate Lab Control Sample KQ2518376-03					
Analyte Name	**Result**	**Spike Amount**	**% Rec**	**Result**	**Spike Amount**	**% Rec**	**% Rec Limits**	**RPD**	**RPD Limit**
Aroclor 1016	0.104	0.125	83	0.108	0.125	86	31-164	4	30
Aroclor 1260	0.101	0.125	81	0.107	0.125	85	34-182	5	30

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Confirmation Results

Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Collected:**	NA
Matrix:	Water	**Date Received:**	
Sample Name:	Lab Control Sample		
Lab Code:	KQ2518376-02	**Units:**	ug/L
		Basis:	NA

Low Level Polychlorinated Biphenyls (PCBs) by GC

Analytical Method: 8082A
Prep Method: EPA 3511

Analyte Name	MRL	Primary Result	Confirmation Result	RPD	Q	Dilution Factor	Date Analyzed
Aroclor 1016	0.0050	0.104	0.105	<1		1	10/17/25 14:52
Aroclor 1260	0.0050	0.101	0.103	2		1	10/17/25 14:52

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Confirmation Results

Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Collected:**	NA
Matrix:	Water	**Date Received:**	
Sample Name:	Duplicate Lab Control Sample		
Lab Code:	KQ2518376-03	**Units:**	ug/L
		Basis:	NA

Low Level Polychlorinated Biphenyls (PCBs) by GC

Analytical Method: 8082A
Prep Method: EPA 3511

Analyte Name	MRL	Primary Result	Confirmation Result	RPD	Q	Dilution Factor	Date Analyzed
Aroclor 1016	0.0050	0.108	0.110	2		1	10/17/25 15:24
Aroclor 1260	0.0050	0.107	0.107	<1		1	10/17/25 15:24

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Client: ALS Environmental - US **Service Request:** K2510257
Project: EV25100058
Sample Matrix: Water

SURROGATE RECOVERY SUMMARY
Semi-Volatile Petroleum Products by GC/FID

Analysis Method: NWTPH-Dx
Extraction Method: EPA 3510C

Sample Name	Lab Code	n-Triacontane 50 - 150	o-Terphenyl 50 - 150
SW-T-20251014	K2510257-001	78	74
Method Blank	KQ2518300-01	75	71
Lab Control Sample	KQ2518300-02	74	76
Duplicate Lab Control Sample	KQ2518300-03	73	76

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Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA
Sample Name:	Method Blank	**Units:**	ug/L
Lab Code:	KQ2518300-01	**Basis:**	NA

Semi-Volatile Petroleum Products by GC/FID

Analysis Method: NWTPH-Dx
Prep Method: EPA 3510C

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (C12 - C25 DRO)	ND U	250	1	10/17/25 11:16	10/16/25	
Residual Range Organics (C25 - C36 RRO)	ND U	500	1	10/17/25 11:16	10/16/25	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	71	50 - 150	10/17/25 11:16	
n-Triacontane	75	50 - 150	10/17/25 11:16	

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Client:	ALS Environmental - US	**Service Request:**	K2510257
Project:	EV25100058	**Date Analyzed:**	10/17/25
Sample Matrix:	Water	**Date Extracted:**	10/16/25

Duplicate Lab Control Sample Summary
Semi-Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Dx	**Units:**	ug/L
Prep Method:	EPA 3510C	**Basis:**	NA
		Analysis Lot:	897529

	Lab Control Sample KQ2518300-02			Duplicate Lab Control Sample KQ2518300-03					
Analyte Name	**Result**	**Spike Amount**	**% Rec**	**Result**	**Spike Amount**	**% Rec**	**% Rec Limits**	**RPD**	**RPD Limit**
Diesel Range Organics (C12 - C25 DRO)	2430	3200	76	2380	3200	74	46-140	2	30
Residual Range Organics (C25 - C36 RRO)	1150	1600	72	1190	1600	75	45-159	4	30

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APPENDIX C

Certificates of Disposal for Non-Hazardous Materials

Dirt Works Bellingham Inc.
PO Box 28576
Bellingham WA 98228
Phone: 360 715-3277
Fax 360 650-1158
info@dirtworksbellingham.com

Release of Liability / Certificate of Disposal / Harris Ave Shipyard Project.
Strider Construction and their client are released from liability for recycled concrete disposal.

Material: Recyclable Concrete

To: Dirt Works Hannegan Recycle Yard
4293 Hannegan Road
Bellingham, WA 98226

From: Harris Avenue Shipyard
Port of Bellingham
Bellingham, WA 98225

Dates Received: 9/16/2025 thru 1/19/2026
Received Via: Strider Construction
Quantity Received: 1,318.55 Tons

Recycling & Disposal Services, Inc
4916 LaBounty Dr.
Ferndale, WA 98248

March 10, 2026

Release of Liability / Certificate of Disposal / Port of Bellingham Harris Avenue Shipyard Cleanup Action. Strider Construction and their client are released from liability for Construction Debris Disposal.

Material Transported: Construction Debris

To: RDS Recycling and Disposal Services, Inc.
4916 LaBounty Dr
Ferndale, WA 98248

From: Harris Ave Shipyard
201 Harris Ave
Bellingham, WA 98225

DATE: September 18, 2025 to January 19, 2026 – 41.15 Tons of Construction Debris

CERTIFICATE OF DESTRUCTION

I, Jeff Sichmeller, of Republic Services (RSI Facility), hereby certify that the entire product described in Section A has been properly and legally disposed of in Roosevelt Regional MSW Landfill on 07/1/2025-03/09/2026 (attach any appropriate documentation).

I understand that due to potential concerns related to such things as health, quality, and loss of goodwill, Strider Construction Co. does not want this product to be distributed to consumers, even through so called "distressed merchandise" channels of trade, and I further certify that these items were destroyed in such a manner that it cannot be sold, and that the company has taken every reasonable step to prevent resale of said items.

Name (print): Jeff Sichmeller

Signature: _____

Title: BU Finance Mgr Post Collection

Date: 03/09/2026

Section A- Products Destroyed (attached additional sheets if needed):

Waste Profile Number (if applicable):41782513131-Jobs TB-13131S, TB-13131F, & BR-0201

Description of Product	*Quantity or Weight*
Contaminated Soil	20,972.57/TN
Clean CDL	74.62/TN

PARBERRY
ENVIRONMENT SOLUTIONS, INC.
Recycling, Storage, Resale & Education
PO BOX 669 Ferndale, WA 98248 Ph 360-734-1112 fax 360-384-5041
DBA Scrap-it

Certificate of Disposal

This is to certify that Strider Construction has properly disposed of and recycled the scrap metal materials generated from the Harris Upland clean-up performed for the Port of Bellingham.

Details of Materials Recycled:

- **Type of Material:** Scrap Metal (ferrous and/or non-ferrous, as applicable)
- **Description:** Ductile, aluminum triplex, 2 shipping containers, heavy melting steel, tin and misc steel that was dug up
- **Estimated Quantity/Weight:** 321,325 pounds
- **Source/Project:** Harris Upland Clean-up
- **Date(s) Received/Processed:** September 2025-January 2026
- **Recycling Method:** The materials were hauled to Scrap-it, a licensed scrap metal recycling facility (Washington State Metal buyer #3334/ Scrap processing # 9900) where they were sorted, processed, and recycled in accordance with all applicable federal, state, and local regulations, including environmental and waste management standards.

This certificate is issued as proof of proper environmental stewardship and compliance with recycling requirements for the benefit of the Port of Bellingham.

Certified by

Brian Parberry (Owner/Operator)

3/10/2026

APPENDIX D

Regulated Building Material Abatement and Disposal Records

LIMITED HAZARDOUS BUILDING MATERIALS SURVEY

Demolition of Harrison Avenue Shipyard Buildings
Port of Bellingham
Bellingham, Washington

Submitted To:

Aspect Consulting, LLC.
103 East Holly Street, Suite 320
Bellingham, Washington 98225

Prepared by:

Med-Tox Northwest
Post Office Box 1446
Auburn, Washington 98071-1446
Telephone: 253-351-0677

Project No. 8660.2rv1



Anthony Fullerton
AHERA BI #190507 Exp. 08/22/2024
September 2023

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Acronyms

AAS	atomic absorption spectroscopy
ACM	asbestos-containing materials
AHERA	Asbestos Hazard Emergency Response Act
ASHARA	Asbestos Schools Hazard Abatement Reauthorization Act
ASTM	American Society of Testing and Materials
CFR	Code of Federal Regulation
DEHP	Di (2-ethylhexyl) phthalate
ECD	electron capture detectors
EPA	U.S. Environmental Protection Agency
GC	gas chromatography
GWB	gypsum wallboard
HBM	hazardous building materials
HID	high intensity discharge
HM	homogeneous material
LBP	lead-based paint
mg/cm^2	milligrams per square centimeter
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
MTNW	Med-Tox Northwest
NIST	National Institute of Standards and Technology
NVLAP	National Voluntary Laboratory Accreditation Program
NWCAA	Northwest Clean Air Agency
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PLM	polarized light microscopy
ppm	parts per million
SAT	Seattle Asbestos Test, LLC.
SF	square feet
TCLP	toxicity characteristic leaching procedure
TSI	thermal system insulation
WAC	Washington Administration Code
WDOC	State of Washington Department of Commerce
WISHA	Washington Industrial Safety and Health Administration
WRD	WISHA Regional Directive
XRF	X-ray fluorescence
% wt	percent by weight

Survey Summary

On August 30, 2023 Anthony Fullerton of Med-Tox Northwest (MTNW) conducted a hazardous building materials (HBM) survey of various buildings at the Harris Avenue Shipyard in Bellingham, Washington. The site is located at 201 Harris Avenue in Bellingham, Washington. This work was conducted under contract to Aspect Consulting, LLC. The client supplied a site drawing that showed the buildings that are going to be impacted by the upcoming project. The buildings surveyed included the Paint Shop building, Sandblast building, Winch building, Water Treatment building, tank farm, Paint building, and the Conex building. There were no other structures or piers included in the survey activities.

A building inspector certified under the Asbestos Hazard Emergency Response Act (AHERA) and employed by MTNW conducted the building material survey in accordance with federal, state, and local regulations to provide for an assessment of asbestos-containing materials (ACM) of the pier and associated structures. The applicable regulations require the building owner to identify and dispose of the identified ACM prior to or during demolition work.

This report identifies building materials that contain asbestos, estimates the quantity of ACM present and documents building materials that potentially contain lead-based paint (LBP), polychlorinated biphenyls (PCBs) and other hazardous materials.

Copies of the inspectors' AHERA building inspector certificate and State of Washington Department of Commerce (WDOC) Risk Assessor certificates are included in **Appendix A**.

Building Information

Photographic documentation of the structure and the major systems described herein are provided in **Appendix B**.

Harris Avenue Shipyard Buildings

The following buildings/tanks were included in the survey activities:

- Paint Shop – Construction date unknown. Single story shop building +/- 1,400 square feet (SF). This wood framed building is finished with corrugated metal siding and roofing. The floor is finished concrete. The interior of the building is finished with gypsum wallboard (GWB) system over fiberglass batt insulation. Rooms in the building include a furnace room, compressor room, and outside covered storage space. Building improvements include a gas-fired furnace for heating and electricity. There were no other improvements observed.
- Sandblast Shed – Construction date unknown. Single story shed building +/- 2,011 SF. This wood framed building is finished with corrugated metal siding and

roofing. The floor is finished concrete. The interior of the building is finished with wood sheeting affixed to the wood framing. At one time the ceiling also had an additional finish (paper-like material attached to the wood framing). At the time of the MTNW survey, there were only remnant pieces of the material left. Rooms in the building include two storage areas located on the east and west sides of the building. The center section appears to have been where sandblasting activities previously took place. At the time of the survey, the area was being used for storage. The building is wired for electricity; there were no other improvements observed.

- Winch House Building – Construction date unknown. Single story building +/- 813 SF. This wood framed building is finished with corrugated metal siding and roofing. The floor is finished concrete. Rooms in the building include a storage room, electrical room, and main winch motor room. The building is wired for electricity; there were no other improvements observed.
- Water Treatment Building – Construction date unknown. Single story building +/- 437 SF. This wood framed building is finished with corrugated metal siding and roofing. The floor is finished concrete. Inside the building are several storage tanks and pipe systems. The building is wired for electricity and plumbing for the water treatment process. Heat is provided by several wall mounted electric space heaters.
- Tank Farm – the tank farm is comprised of eight above ground storage tanks that range in size and construction. Most of the tanks are situated around the exterior of the Water Treatment building. The following tanks were surveyed as part of the tank farm:
    1. Tank #1- steel tank that is 40,000 gallons,
    2. Tank #2- fiberglass tank that is 31,000 gallons,
    3. Tank #3- fiberglass tank that is 20,343 gallons,
    4. Tank #4- fiberglass tank that is 24,000 gallons,
    5. Tank #5- steel tank that is 24,000 gallons,
    6. Tank #6- fiberglass tank inside water treatment building
    7. Tank #7- steel tank that is 8,722 gallons,
    8. Tank #8- steel tank that is 6,392 gallons.
- Paint Building – Construction date unknown. Single story building +/- 325 SF. This small wood-frame structure is finished with corrugated sheet metal siding and roofing. The floor is finished concrete. Interior finishes include fiberglass batt insulation.
- Conex Building – Construction date unknown. Single story building +/- 1,656 SF. This structure consists of two repurposed metal freight containers (one all steel

shipping container and one old refrigerator unit) that are approximately 288 SF each. The containers are spaced apart and there is a metal framed roof structure affixed over the open area to create additional room for covered storage. The storage space is approximately 1,080 SF in size. The north container (refrigerator unit) has several interior finishes and there has been a wall constructed to divide the space. Interior finishes include untextured GWB system and fibrous corrugated wall panels along with caulking on the interior walls and ceiling seams. The roof of the north container has sealant applied to the metal panels. The containers have been wired for electricity, there were no other improvements observed.

Asbestos Survey

The AHERA regulation, 40 Code of Federal Regulations (CFR) 763, is the primary governing regulation when performing asbestos surveys. This regulation was originally enacted for school buildings but has since been applied to public and commercial buildings by the Asbestos School Hazard Abatement Reauthorization Act (ASHARA) in 1994 and by the Occupational Safety and Health Administration's (OSHA) worker protection regulations in 1995, specifically 29 CFR 1926.1101(k).

Northwest Clean Air Agency (NWCAA) also requires compliance with AHERA's survey and sampling requirements. This applies to any renovation or demolition activities where suspected ACM may be disturbed. NWCAA is a local agency that receives statutory authority from the U.S. Environmental Protection Agency (EPA) to enforce environmental regulations.

AHERA divides suspect ACM into three categories: "surfacing materials" (i.e., sprayed fireproofing, popcorn ceiling texture, etc.), "thermal system insulation" (TSI) (i.e., pipe or building insulation, etc.), and "miscellaneous materials" (i.e., flooring material, roofing, construction mastics, etc.). The following sections summarize the potential ACMs identified for each of these three categories. For a complete listing of suspect materials sampled, see **Appendix C**.

Table 1 summarizes ACM identified on the pier and associated sheds surveyed by Med-Tox Northwest. Friability was determined by conditions observed during the survey and by how the material behaves during mechanical demolition.

Table 1. Summary of Asbestos Containing Materials

Material	Location	Friable	Quantity*
Conex Building			
Roof sealant	North container roof	No	288 SF
Paint Shop Building			
There were no asbestos containing materials identified in this building.			
Sandblast Building			

Material	Location	Friable	Quantity*
There were no asbestos containing materials identified in this building.			
Winch Building			
There were no asbestos containing materials identified in this building.			
Water Treatment Building			
There were no asbestos containing materials identified in this building.			
Tank Farm			
There were no asbestos containing materials identified with the associated tanks or piping systems.			
Paint Building			
There were no asbestos containing materials identified in this building.			

SF=square feet. *Quantities are approximate. Note: This table is not to be used without the complete survey document including appendices for additional information.

Homogeneous material (HM) descriptions in the following text are provided to help correlate material descriptions provided in Appendix C.

Surfacing Materials

There was one surfacing material identified in the Conex Building as defined in 40 CFR 763.

- Silver paint on GWB (HM-25). This material was found on the interior demising wall (finished with GWB) of the north container. Three samples were collected of this material based on total square footage observed. This material is negative for asbestos.

The were no surfacing materials observed in the other buildings included in the survey.

Thermal System Insulation

There were five TSI materials identified in the buildings as defined in 40 CFR 763.

Paint Shop Building

- White plastic with mastic and fiberglass batt insulation (HM-01). This material was found on lining the walls and ceiling of the building. Three samples were collected of this material based on total square footage observed. This material is negative for asbestos.

Water Treatment Building

- White plastic with mastic and fiberglass batt insulation (HM-15). This material was found on lining the walls and ceiling of the building. Three samples were collected of this material based on total square footage observed. This material is negative for asbestos.

Tank Farm

- Canvas pipe wrap and white sealant over fiberglass and foam insulation (HM-19). This pipe insulation was observed on the outside of Tank #4. Three samples were collected of this material based on total square footage observed. This material is negative for asbestos.
- Canvas pipe wrap and white sealant over fiberglass and foam insulation (HM-20). This pipe insulation was observed on the outside of Tank #5. Three samples were collected of this material based on total square footage observed. This material is negative for asbestos.

Paint Building

- White plastic with mastic and fiberglass batt insulation (HM-22). This material was found on lining the walls and ceiling of the building. Three samples were collected of this material based on total square footage observed. This material is negative for asbestos.

There were no TSI materials observed in the Sandblast Building, Winch Building, or the Conex Building.

Miscellaneous Materials

Paint Shop Building

- Un-textured gypsum wallboard system (HM-02). This material was observed on the interior walls. Three samples were collected of this material; this material is negative for asbestos.
- Paint coating on floor (HM-03). This material was observed on the concrete floor. Two samples were collected of this material; this material is negative for asbestos.
- Screw gasket (HM-04). This material was observed under the exterior siding screws. Two samples were collected of this material; this material is negative for asbestos.
- Black tar sealant (HM-05). This material was observed on the exterior of the south wall by the main entrance door on the bottom of the wall. Two samples were collected of this material; this material is negative for asbestos.

Sandblast Building

- Remnant ceiling paper (HM-06). This material was observed on the ceiling. Three samples were collected and analyzed for asbestos content; this material was determined to be negative for asbestos.
- Remnant wall mastic (HM-07). This material was observed on the east side of the building on the wood wall panel. Two samples were collected and analyzed for asbestos content; this material was determined to be negative for asbestos.

- Door in-fill caulk (HM-08). This material was observed in the east storage area. Two samples were collected and analyzed for asbestos content; this material was determined to be negative for asbestos.
- Flashing sealant (HM-09). This material was observed on the east side exterior siding. Two samples were collected and analyzed for asbestos content; this material was determined to be negative for asbestos.
- Window frame caulk (HM-10). This material was observed around the exterior window frames. Two samples were collected and analyzed for asbestos content; this material was determined to be negative for asbestos.
- Corrugated metal siding sealant (HM-11). This material was observed on the exterior corrugated metal siding. Two samples were collected and analyzed for asbestos content; this material was determined to be negative for asbestos.
- Screw gasket (HM-12). This material was observed under the exterior siding screws. Two samples were collected of this material; this material is negative for asbestos.

Winch Building

- Blue sheet flooring (HM-13). This material was observed on the floor in the electrical room. Two samples were collected of this material; this material is negative for asbestos.
- Screw gasket (HM-14). This material was observed under the exterior siding and roof screws. Two samples were collected of this material; this material is negative for asbestos.

Water Treatment Building

- Screw gasket (HM-16). This material was observed under the exterior siding screws. Two samples were collected of this material; this material is negative for asbestos.

Tank Farm

- Remnant caulk (HM-17). This material was observed on the side of Tank #1. Two samples were collected and analyzed for asbestos content; this material was determined to be negative for asbestos.
- Black flange gasket (HM-18). This material was observed on the flanges of Tanks #2 and #3. Two samples were collected and analyzed for asbestos content; this material was determined to be negative for asbestos.
- Black flange gasket (HM-21). This material was observed on Tank #5. Two samples were collected and analyzed for asbestos content; this material was determined to be negative for asbestos.

Paint Building

- Green flange gasket (HM-23). This material was observed on the pipes inside the building. Two samples were collected and analyzed for asbestos content; this material was determined to be negative for asbestos.
- Siding caulk (HM-24). This material was observed on the exterior siding and window frame. Two samples were collected of this material; this material is negative for asbestos.

Conex Building

- Fibrous corrugated wall (HM-26). This material was observed on the walls in the north Conex container. Two samples were collected of this material; this material is negative for asbestos.
- Un-textured GWB system (HM-27). This material was observed on the demising wall in the north Conex container. Two samples were collected of this material; this material is negative for asbestos.
- Caulk on interior walls and ceiling seams (HM-28). This material was observed on the walls and ceiling in the north Conex container. Two samples were collected of this material; this material is negative for asbestos.
- **Roof sealant (HM-29).** This material was observed on the roof of the north Conex. Two samples were collected and analyzed for asbestos content; this material was **determined to contain 3% Chrysotile asbestos**.

Table 2 lists all suspect materials sampled that have been determined to be non-asbestos containing.

Table 2. Summary of Suspect Materials Determined Non-Asbestos Containing

Material Location	Material Description
Paint Shop Building	
White plastic with mastic and fiberglass batt insulation (HM-01)	Un-textured GWB system (HM-02)
Paint coating on floor (HM-03)	Screw gasket (HM-04)
Black tar sealant (HM-05)	
Sandblast Building	
Remnant ceiling paper (HM-06)	Remnant wall mastic (HM-07)
Door in-fill caulk (HM-08)	Flashing sealant (HM-09)
Window frame caulk (HM-10)	Corrugated metal siding sealant (HM-11)
Screw gasket (HM-12)	
Winch Building	
Blue sheet flooring (HM-13)	Screw gasket (HM-14)
Water Treatment Building	
White plastic with mastic and fiberglass batt	Screw gasket (HM-16)

Material Location	Material Description
insulation (HM-15)	
Tank Farm	
Remnant caulk (HM-17)	Black flange gasket (HM's 18 and 21)
Canvas wrap and white sealant over fiberglass and foam insulation (HM's 19 and 20)	
Paint Building	
White plastic with mastic and fiberglass batt insulation (HM-22)	Green pipe flange gasket (HM-23)
Siding caulk (HM-24)	
Conex Building	
Silver paint on GWB wall (HM-25)	Fibrous corrugated wall (HM-26)
Un-textured GWB system (HM-27)	Caulk on interior walls and ceiling seams (HM-28)

Note: This table is not to be used without the complete survey document including appendices for additional information.

Lead-Based Paint Summary

Lead was commonly used in most paint products until 1978, when it was banned from residential paints at concentrations greater than 600 parts per million (ppm); however, commercial applications with lead were still utilized and are still available. Lead is poisonous to the human body and presents a potential health hazard during any kind of disturbance (such as maintenance, including grinding, welding, and cutting) and if improperly disposed, where lead can enter drinking water supplies.

EPA defines lead-based paint as a concentration of 1.0 milligram per centimeter squared (mg/cm^2) or greater by x-ray fluorescence (XRF) or 0.5 percent by weight or greater by total lead analysis (equivalent to 5,000 milligram per kilogram [mg/kg]). This EPA action level triggers requirements for protection of the environment, maintenance workers, and building occupants in child occupied facilities. It also triggers training and certification requirements for inspectors, project designers, contractors, supervisors, and workers. Although these requirements only apply to certain residential and/or child occupied structures at this time, they could apply to this type of property sometime in the future.

Washington Industrial Safety and Health Administration (WISHA) worker protection regulations has not defined a minimum concentration for regulating lead and has clarified that lead at any detectable concentration shall be considered regulated (Washington Administrative Code [WAC] 296-155-176, Lead).

Lead in Painted Surfaces

Interior and exterior painted surfaces were tested for LBP using bulk sample collection and chemical analysis. A total of seven (7) paint chip samples were collected. Analytical results are provided in **Table 3**.

Table 3. Summary of Bulk Paint Chip Sample Results.

Sample Number	Location	Component	Substrate	Color	Result (ppm)
Paint Shop Building					
8066.2-AF-01PB	Interior	Wall	GWB	Multi-color	<80
8066.2-AF-02PB	Interior	Wall	GWB	White	<80
8066.2-AF-03PB	Interior slab	Floor	Concrete	Multi-color	<80
Tank Farm					
8066.2-AF-04PB	Tank #1	Exterior	Steel	Beige	<230
8066.2-AF-05PB	Tank #5	Exterior	Steel	Beige/yellow	**140,000**
8066.2-AF-06PB	Tank #8	Exterior	Steel	Black	**630**
Conex Building					
8066.2-AF-07PB	North Conex interior	Wall	GWB	Multi-color	<80

gwb = gypsum wallboard, ppm = parts per million. **Bolded values** – bulk paint chip samples with lead detected above the laboratory reporting limit have been bolded/. The WISHA worker protection regulations have stated that lead at any detectable concentration shall be considered regulated WAC 296-155-176, Lead.

Other Hazardous Building Materials

Chlorofluorocarbons

Med-Tox Northwest inspected the buildings at the site for cooling systems with potential CFCs. None of the buildings had cooling units and no portable air conditioners were observed.

PCB Light Ballasts and Fluorescent Light Tubes

Older fluorescent light ballasts have small capacitors that may contain high concentrations of PCB. Nearly all ballasts manufactured before 1979 contain PCBs. All ballasts manufactured after July 1, 1978 that do not contain PCBs are required to be clearly marked "No PCBs". Unmarked ballasts or ballasts without a date code should be assumed to be PCB ballasts. PCBs are toxic chemicals according to the EPA. While there is only a small amount, about one ounce, of PCBs in each light ballast capacitor, there are a large number of ballasts in the United States. About half of the one billion ballasts, estimated as currently installed, were manufactured before 1979 and usually contain PCBs. Ballasts manufactured after 1978 may contain a PCB replacement called Di (2-ethylhexyl) phthalate (DEHP), a probable human carcinogen. In any case, ballasts should not be disassembled for disposal but collected and sent to a certified recycling/disposal facility.

Fluorescent light fixtures were observed throughout the building. These fixtures were not inspected for the presence of PCB light ballasts due to being in use and the likelyhood that many have been replaced since 1971. Determining how many fluorescent lights actually contain PCB ballasts can only be verified during demolition. Therefore, all light fixtures are assumed to contain PCB light ballasts; light tubes are assumed to contain mercury. Additionally, exit lights, high intensity discharge (HID) lamps, smoke and heat detectors, and fire extinguishers may be regulated as universal or hazardous waste and will require dismantling and special handling. **Table 4** provides a summary of these items in the building:

Table 4. Summary of Light Fixtures.

Location/floor	HID lights	8-foot, 2-bulb	4-foot, 3-bulb	4-foot, 2-bulb	Smoke/ heat detectors	Exit lights
Site wide	16	10	0	13	0	0
Total	**16**	**10**	**0**	**13**	**0**	**0**

Typically, there is one ballast for every two light tubes in a fluorescent light fixture; accordingly, there are approximately 39 ballasts in the light fixtures requiring recycling or PCB hazardous waste disposal. There are also 46 light tubes that will need to be recycled during renovation/ demolition.

PCB in Caulking and Paint

PCBs were used in paint and caulk formulations as drying oils (resins) and plasticizers or softening agents (liquids). Wood, concrete, gypsum wallboard and metal may have painted surfaces containing PCBs.

PCBs were tested in representative paints from the interior and exteriors of the buildings located on the Harris Avenue Shipyard. **Table 5** below provides a summary of PCB sample results.

Table 5. Summary of Bulk PCB Sample Results.

Sample Number	Location	Material	Result (mg/kg*)
Paint Shop Building			
8660.2-AF-01PCB	Interior walls	Paint coating on GWB walls	ND
8660.2-AF-02PCB	Interior floor	Paint coating on concrete floor	ND
Sandblast Building			
8660.2-AF-03PCB	East storage area	Door infill caulk	ND
8660.2-AF-04PCB	Exterior	Siding caulk	ND
Tank Farm			

Sample Number	Location	Material	Result (mg/kg*)
8660.2-AF-05PCB	Tank #1	Remnant caulk on tank exterior	ND
8660.2-AF-06PCB	Tank #1	Paint coating on tank exterior	ND
8660.2-AF-07PCB	Tank #5	Paint coating on tank exterior	ND
8660.2-AF-08PCB	Tank #8	Paint coating on tank exterior	0.65 Aroclor 1254
Paint Building			
8660.2-AF-09PCB	Exterior	Siding and window frame caulk	ND
Conex Building			
8660.2-AF-10PCB	North Conex interior	Caulk on wall and ceiling seams	ND
8660.2-AF-11PCB	North Conex interior	Paint on center GWB wall	ND

gwb = gypsum wallboard, mg/kg= milligrams per kilogram, ND = none detected. Note: Do not use this table without the complete survey document.

Mercury Containing Switches

Heating system thermostats were investigated for mercury containing systems; none were observed.

Laboratory Analytical Methods

Asbestos-Containing Materials

Bulk samples were analyzed by Polarized Light Microscopy (PLM) dispersion staining EPA Method 600/R-93/116 by Seattle Asbestos Test, LLC (SAT). SAT is accredited through the National Voluntary Laboratory Accreditation Program (NVLAP) administered by the National Institute of Standards and Technology (NIST), a division of the U.S. Department of Commerce. This accreditation does not constitute endorsement, but rather a finding of laboratory competence. The NVLAP participant number for SAT is 200876-0 (certification copy is located in **Appendix D**). Analytical results are in **Appendix E**.

Lead-Based Paint

Bulk paint chip samples were submitted to EMSL Analytical, Inc., for analysis. Paint chip samples were analyzed for lead using atomic absorption spectroscopy (AAS) to determine the presence and percentage of lead. Procedures for analyzing metals are found in the American Society of Testing and Materials (ASTM) D-3335-78 and EPA Method Manual SW-846, Method 6010. (EMSL Analytical Inc. used SW 846 3050B*/7000B).

Analytical results for paint chips are provided in **Appendix F**. EMSL Analytical, Inc.'s laboratory certification is attached in **Appendix G**.

PCBs

Bulk PCB samples were submitted to On-Site Environmental, Inc., for analysis using gas chromatography (GC) equipped with electron capture detectors (ECD). Samples were analyzed using EPA Method SW-846 8082A. Analytical results are provided in **Appendix H**. On-Site Environmental, Inc. laboratory certification is attached in **Appendix I**.

A sample location drawing is provided in **Appendix J**.

Comments and Recommendations

Asbestos-Containing Materials

Med-Tox Northwest recommends, and state law requires, that all asbestos materials be removed prior to impact from renovation and/or demolition with few exceptions.

Additional destructive investigation and sampling will be required prior to and during demolition activities including the following:

1. None of the doors in the buildings appeared to be of the type with asbestos fire rating protection; however, prior to demolition and disposal, inspect each door and door frame to verify no suspect fire protection material (potential ACM) is located inside.
2. Prior to demolition activities, inspect all wiring systems for potential ACM.

Med-Tox Northwest recommends that this survey report be placed on-site during renovation and/or demolition and copies provided to the contractor(s) bidding and performing work. WISHA and NWCAA require that the report be on-site and available for review during the entire project duration.

WISHA requires ACM be removed by trained and licensed contractors using certified asbestos abatement workers and supervisors (except for deregulated roofing sealants, mastics, and coatings). A 10-day prior notification is also required before abatement can begin. In addition, NWCAA requires notification and fees prior to beginning asbestos removal, their prior notification requirement is 10 working days.

Med-Tox Northwest recommends third party oversight of asbestos and demolition activities by an AHERA accredited building inspector to ensure regulatory compliance and completion of the additional destructive methods recommended herein. Additionally, Med-Tox Northwest recommends requesting unit pricing from abatement contractors during the bidding process to adjust pricing depending on actual quantities verified in the field.

Lead-Based Paint

With respect to painted surfaces and demolition, OSHA regulates lead at any measurable level and therefore, any paint disturbing activity is subject to compliance with 29 CFR 1926.62. Based on the survey results, the paint on tanks #5 and #8 contain high levels of lead in the paint. It is required that any work with the painted tanks be done in compliance with 29 CFR 1926.62. This requirement will apply to all construction trades, unless painted surfaces are removed during demolition activities, which is typically cost prohibitive. The above-stated regulations pertain specifically to

employee exposure during any maintenance, renovation, demolition, decorating, or new construction project where lead is present.

The leachable lead concentration in the waste stream was not tested at the time of the survey. Based on the results of the lead samples collected, the limited number of painted materials and that most of the buildings/ tanks are constructed of metal (which is recyclable) the waste stream for the demolition debris from the site will most likely be less than 5.0 mg/l.

PCB

There was one (1) paint that was determined to contain PCB's less than 50 ppm. PCB-containing waste in demolition debris cannot be recycled. It may go to a subtitle D landfill. Profiling and special transport requirements (i.e., lined containers) apply.

Work procedures for proper removal and protection of workers should be provided to contractors in accordance with WAC 296-155 and WAC 296-841. This includes Hazardous Communications training as it pertains to PCB's considered a remediation waste.

During demolition, the asbestos abatement contractor should be tasked with dismantling light fixtures, collecting all lighting ballasts for proper disposal, and recycling the light tubes. Ballasts without "No-PCB" labels are considered PCB-containing and must be disposed of as hazardous waste. "No-PCB" ballasts may designate as Washington Dangerous Waste and should be sent to an EPA licensed facility for proper disposal. Light tubes can be recycled as a universal waste for minimal cost or must be disposed of as a hazardous waste.

Other Hazardous Building Materials

Fluorescent light tubes contain mercury and can be recycled as a universal waste for minimal cost. HID lights should be collected and recycled/disposed of appropriately.

Limitations

A good faith effort has been made to identify ACM, LBP and other HBM in preparation for building demolition at Harrison Avenue Shipyard. This survey was performed for complete demolition of the buildings. Additional destructive investigation and sampling will be required depending on inaccessible building systems including mechanical spaces and/or mechanical/electrical system routing.

Sampling was performed consistent with the level of care and skill ordinarily exercised by professionals currently practicing under similar conditions in the area. No other warranty, expressed or implied, is made.

This report has been prepared for the exclusive use of Aspect Consulting, LLC and its' designates for this project only. The analyses, conclusions, and recommendations presented in this report are based on conditions encountered at the time of our survey and our experience and judgment. MTNW cannot be held responsible for interpretation by others of the data contained in this report; any use of this report shall include the entire document. This survey is not intended for use as abatement plans and/or specifications which MTNW recommends for regulatory compliance.

This report reflects Med-Tox Northwest's observations of the condition of the property during the time of field activities and does not cover conditions that may be found at some later time on the property that were not visible during these field activities.

Appendix A
AHERA Building Inspector and WDOC Risk Assessor Certificates

STATE OF WASHINGTON

Department of Commerce

Lead-Based Paint Abatement Program

Anthony L Fullerton

Has fulfilled the certification requirements of
WAC 365-230
and has been certified to conduct lead-based paint activities as a
Risk Assessor

Certification #	Issuance Date	Expiration Date
0242	08/13/2020	04/03/2023

Certificate of Completion

This is to certify that

Anthony L. Fullerton

has satisfactorily completed
4 hours of online refresher training as an

AHERA Building Inspector

to comply with the training requirements of
TSCA Title II, 40 CFR 763 (AHERA)

EPA Provider # 1085

186102
Certificate Number

ARGUS PACIFIC
TRAINING • CONSULTING
A Terracon COMPANY

Aug 25, 2022 Expires in 1 year.
Date(s) of Training

Exam Score: N/A
(if applicable)

Instructor: David Welch

ARGUS PACIFIC, INC / 21905 64th AVE W, SUITE 100 / MOUNTLAKE TERRACE, WASHINGTON 98043 / 206.285.3373 / ARGUSPACIFIC.COM

Appendix B
Building and Building System Photographic Documentation



Photo 1: Paint Shop Building facing southwest.



Photo 2: Interior of the Paint Shop Building.



Photo 3: Exterior of the Sandblast Shed Building facing northwest.



Photo 4: Typical finishes observed inside the Sandblast Shed Building.



Photo 5: Winch House Building facing south.



Photo 6: Typical finishes observed in the Winch Building.



Photo 7: Water Treatment Building facing southwest.

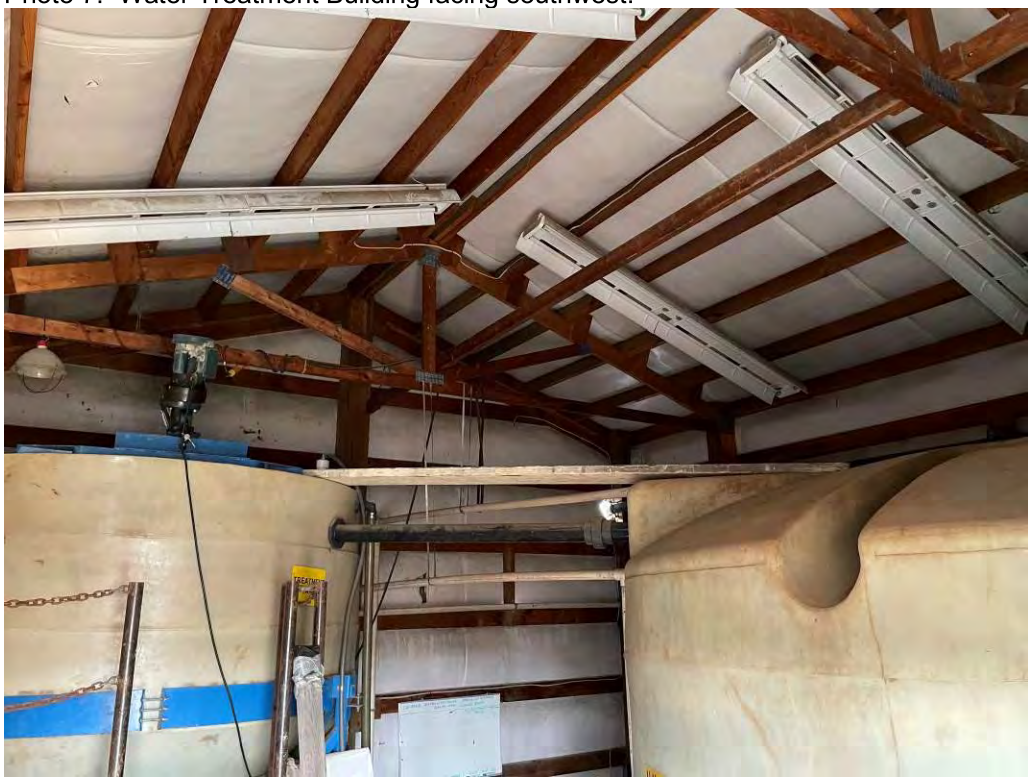


Photo 8: Typical finishes observed inside the Water Treatment Building.



Photo 9: Tank farm tanks #4 and #5 facing north.



Photo 10: Tank #8 with low levels of PCB's in the black paint.



Photo 11: Paint Building facing northwest.



Photo 12: Typical finishes observed inside the Paint Building.



Photo 13: Conex building facing southwest.



Photo 14: ACM roof sealant on north container roof.

Appendix C
Summary of Materials Sampled for Asbestos

Table C-1. Summary of Materials Sampled for Asbestos

Sample	Material	Location	AHERA Type	HM	Result
Paint Shop Building					
8660.2-AF-001	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	ND
8660.2-AF-002	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	ND
8660.2-AF-003	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	ND
8660.2-AF-004	Un-textured GWB system	Interior walls	Misc.	02	ND
8660.2-AF-005	Un-textured GWB system	Interior walls	Misc.	02	ND
8660.2-AF-006	Un-textured GWB system	Interior walls	Misc.	02	ND
8660.2-AF-007	Paint coating on floor	Interior slab	Misc.	03	ND
8660.2-AF-008	Paint coating on floor	Interior slab	Misc.	03	ND
8660.2-AF-009	Screw gasket	Exterior siding and roof	Misc.	04	ND
8660.2-AF-010	Screw gasket	Exterior siding and roof	Misc.	04	ND
8660.2-AF-011	Black tar sealant (10LF)	Exterior- south wall by main entrance door	Misc.	05	ND
8660.2-AF-012	Black tar sealant (10LF)	Exterior- south wall by main entrance door	Misc.	05	ND
Sandblast Building					
8660.2-AF-013	Remnant ceiling paper	Interior at ceiling	Misc.	06	ND
8660.2-AF-014	Remnant ceiling paper	Interior at ceiling	Misc.	06	ND
8660.2-AF-015	Remnant wall mastic	Interior – east wall on wood	Misc.	07	ND
8660.2-AF-016	Remnant wall mastic	Interior – east wall on wood	Misc.	07	ND
8660.2-AF-017	Door infill caulk	Interior	Misc.	08	ND
8660.2-AF-018	Door infill caulk	Interior	Misc.	08	ND
8660.2-AF-019	Flashing sealant	Exterior siding	Misc.	09	ND
8660.2-AF-020	Flashing sealant	Exterior siding	Misc.	09	ND
8660.2-AF-021	Window frame caulk	Exterior windows	Misc.	10	ND
8660.2-AF-022	Window frame caulk	Exterior windows	Misc.	10	ND
8660.2-AF-023	Corrugated metal siding sealant	Exterior siding	Misc.	11	ND
8660.2-AF-024	Corrugated metal siding sealant	Exterior siding	Misc.	11	ND
8660.2-AF-025	Screw gasket	Exterior siding and roof	Misc.	12	ND
8660.2-AF-026	Screw gasket	Exterior siding and roof	Misc.	12	ND
Winch Building					ND
8660.2-AF-027	Blue sheet flooring	Electrical room	Misc.	13	ND

Sample	Material	Location	AHERA Type	HM	Result
8660.2-AF-028	Blue sheet flooring	Electrical room	Misc.	13	ND
8660.2-AF-029	Screw gasket	Exterior siding and roof	Misc.	14	ND
8660.2-AF-030	Screw gasket	Exterior siding and roof	Misc.	14	ND
Water Treatment Building					
8660.2-AF-031	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	15	ND
8660.2-AF-032	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	15	ND
8660.2-AF-033	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	15	ND
8660.2-AF-034	Screw gasket	Exterior siding and roof	Misc.	16	ND
8660.2-AF-035	Screw gasket	Exterior siding and roof	Misc.	16	ND
Tank Farm					
8660.2-AF-036	Remnant caulk	Tank #1	Misc.	17	ND
8660.2-AF-037	Remnant caulk	Tank #1	Misc.	17	ND
8660.2-AF-038	Black flange gasket	Tank #2	Misc.	18	ND
8660.2-AF-039	Black flange gasket	Tank #3	Misc.	18	ND
8660.2-AF-040	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #4	TSI	19	ND
8660.2-AF-041	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #4	TSI	19	ND
8660.2-AF-042	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #4	TSI	19	ND
8660.2-AF-043	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #5	TSI	20	ND
8660.2-AF-044	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #5	TSI	20	ND
8660.2-AF-045	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #5	TSI	20	ND
8660.2-AF-046	Black flange gasket	Tank #5	Misc.	21	ND
8660.2-AF-047	Black flange gasket	Tank #5	Misc.	21	ND
Paint Building					
8660.2-AF-048	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	22	ND

Harrison Avenue Shipyard

Sample	Material	Location	AHERA Type	HM	Result
8660.2-AF-049	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	22	ND
8660.2-AF-050	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	22	ND
8660.2-AF-051	Green pipe flange gasket	Interior piping (north wall)	Misc.	23	ND
8660.2-AF-052	Green pipe flange gasket	Interior piping (north wall)	Misc.	23	ND
8660.2-AF-053	Siding caulk	Exterior siding and window frame	Misc.	24	ND
8660.2-AF-054	Siding caulk	Exterior siding and window frame	Misc.	24	ND
Conex Building					
8660.2-AF-055	Silver paint on GWB wall	Interior wall- north Conex	Surfacing	25	ND
8660.2-AF-056	Silver paint on GWB wall	Interior wall- north Conex	Surfacing	25	ND
8660.2-AF-057	Silver paint on GWB wall	Interior wall- north Conex	Surfacing	25	ND
8660.2-AF-058	Fibrous corrugated wall	Interior walls- north Conex	Misc.	26	ND
8660.2-AF-059	Fibrous corrugated wall	Interior walls- north Conex	Misc.	26	ND
8660.2-AF-060	Un-textured GWB system	Interior wall- north Conex	Misc.	27	ND
8660.2-AF-061	Un-textured GWB system	Interior wall- north Conex	Misc.	27	ND
8660.2-AF-062	Caulk on interior walls and ceiling seams	Interior- north Conex	Misc.	28	ND
8660.2-AF-063	Caulk on interior walls and ceiling seams	Interior- north Conex	Misc.	28	ND
8660.2-AF-064	**Roof sealant**	**North Conex**	**Misc.**	**29**	**3% CHR**
8660.2-AF-065	**Roof sealant**	**North Conex**	**Misc.**	**29**	**3% CHR**

Appendix D
National Voluntary Laboratory Accreditation Program Certificates

United States Department of Commerce
National Institute of Standards and Technology

Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200768-0

Seattle Asbestos Test, LLC

Lynnwood, WA

is accredited by the National Voluntary Laboratory Accreditation Program for specific services, listed on the Scope of Accreditation, for:

Asbestos Fiber Analysis

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).

2022-10-01 through 2023-09-30

Effective Dates

For the National Voluntary Laboratory Accreditation Program

Appendix E
Analytical Reports- Asbestos

SEATTLE ASBESTOS TEST, LLC

Lynnwood Laboratory: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel: 425.673.9850, Fax: 425.673.9810, NVLAP Lab Code: 200768-0

www.seattleasbestostest.com, admin@seattleasbestostest.com

Project Manager:	Anthony Fullerton	Date Analyzed:	9/5/2023
Client:	Med-Tox, Northwest	Client Job#:	8660.2
Address:	PO Box 1446, Auburn, WA 98071-1446	Project Location:	Harrison Ave Shipyard Bellingham, WA
Tel:	253.351.0677	Laboratory batch#:	202213008
Date Report Issued:	9/5/2023	Samples Received:	65

Enclosed please find the test results for the bulk samples submitted to our laboratory for asbestos analysis. Analysis was performed using polarized light microscopy (PLM) in accordance with Test Method US EPA - 40 CFR Appendix E of Part 763, Interim Method of Determination of Asbestos in Bulk Insulation Samples and Test Method US EPA/600/R-93/116.

Percentages for this report are done by visual estimate and relate to the suggested acceptable error ranges by the method. Since variation in data increases as the quantity of asbestos decreases toward the limit of detection, the EPA recommends point counting for samples containing between <1% and 10% asbestos (NESHAP, 40 CFR Part 61). Statistically, point counting is a more accurate method. If you feel a point count might be beneficial, please feel free to call and request one.

The test results refer only to the samples or items submitted and tested. The accuracy with which these samples represent the actual materials is totally dependent on the acuity of the person who took the samples. This report must not be used by the client to claim product certification, approval, or endorsement by Seattle Asbestos Test, LLC, NVLAP, NIST, or any agency of the Federal government. The test report or callbration certificate shall not be reproduced except in full, without written approval of the laboratory. If the sample is inhomogeneous the sub-samples of the components are analyzed separately as layers.This report in its entirety consists of this cover leter, the customer sampling COC or data sheet, and the analytical report which is page numbered.

This report is highly confidential and will not be released without your consent. Samples are archived for 30 days after the analysis, and disposed of as hazardous waste thereafter.

Thank you for using our service and let us know if we can further assist you.

Sincerely

SZhang

Steve (Fanyao) Zhang
Approved Signatory

20221300 8

SEATTLE ASBESTOS TEST, LLC

Analyzing Quality

Lynnwood Lab: 19711 Scriber Lake Road, Suite D, WA 98036, Tel:425.673.9850, Fax:425.673.9810
Bellevue Lab: 12727 Northup Way, Suite 1, Bellevue, WA 98005, Tel:425.861.1111, Fax:425.861.1118
Email: admin@seattleasbestostest.com, Website: www.seattleasbestostest.com

CHAIN OF CUSTODY

☒ Bulk Asbestos ☐ Point Count 400 ☐ Point Count 1000 ☐ Point Count Gravimetric ☐ Other (Specify) _____
☐ 1 Hour ☐ 2 Hours ☐ Same day (4 to 6 Hrs.) ☐ 1 Day ☒ 5 Days

Med-Tox, Northwest

PO Box 1446, Auburn, WA 98071-1446 Tel: 253.351.0677 Fax: 253.351.0688

Number of Samples 65 PO# 8660.2 Project Location Harrison Ave Shipyard Bellingham, WA

Project Manager (Check one or more):

☒	Anthony Fullerton	206.356.8927	fullertona@medtoxnw.com	☐	evansc@medtoxnw.com
☐	Ginnie Kindler		kindlerg@medtoxnw.com	☐ Jon Havelock	havelockj@medtoxnw.com
☐				☐ Teresa Choate	choatet@medtoxnw.com

SEQ#	CLIENT SAMPLE #	SAMPLE DESCRIPTION	LOCATION	NOTES
1	8660.2-AF-001			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11		See Table		
12				
13				
14				
15				
16				
17				
18				
19				
20	8660.2 AF-065			

	Print Name	Signature	Company	Date	Time
Sampled:	A Fullerton		Med-Tox, Northwest	8/30/23	
Relinquished:	A Fullerton		Med-Tox, Northwest	9/1/23	
Delivered:			Med-Tox, Northwest		
Received:	Kingping Lin		Seattle Asbestos Test	9/4/23	13:45
Analyzed:	Kingping Lin		Seattle Asbestos Test	9/5/23	11:00
Reported:			Seattle Asbestos Test		

Seattle Asbestos Test warrants the test results to be of a precision normal for the type and methodology employed for each sample submitted and disclaims any other warrants, expressed or implied, including warranty of fitness for a particular purpose and warranty of merchantability. Seattle Asbestos Test accepts no legal responsibility for the purpose for which the client uses the test results. By signing on this form, the clients agree to relieve Seattle Asbestos Test of any liability that may arise from the test results. It is the client's responsibility to make sure the samples are appropriately taken according to federal and local regulations. Invoices paid late may be charged of interest, and invoices go to collection may be charged 17% to 25% of collection fee. NSF checks will be charged of $50.

Results reporting method: ☐ Phone ☐ Fax ☐ Email ☐ Pick-up

☐ Composite all wallboard samples ☐ Text result to phone ☐ Point count ..... % or less asbestos Page ( ) of ( )

Table C-1. Summary of Materials Sampled for Asbestos

Sample	Material	Location	AHERA Type	HM	Result
Paint Shop Building					
8660.2-AF-001	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	
8660.2-AF-002	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	
8660.2-AF-003	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	
8660.2-AF-004	Un-textured GWB system	Interior walls	Misc.	02	
8660.2-AF-005	Un-textured GWB system	Interior walls	Misc.	02	
8660.2-AF-006	Un-textured GWB system	Interior walls	Misc.	02	
8660.2-AF-007	Paint coating on floor	Interior slab	Misc.	03	
8660.2-AF-008	Paint coating on floor	Interior slab	Misc.	03	
8660.2-AF-009	Screw gasket	Exterior siding and roof	Misc.	04	
8660.2-AF-010	Screw gasket	Exterior siding and roof	Misc.	04	
8660.2-AF-011	Black tar sealant (10LF)	Exterior- south wall by main entrance door	Misc.	05	
8660.2-AF-012	Black tar sealant (10LF)	Exterior- south wall by main entrance door	Misc.	05	
Sandblast Building					
8660.2-AF-013	Remnant ceiling paper	Interior at ceiling	Misc.	06	
8660.2-AF-014	Remnant ceiling paper	Interior at ceiling	Misc.	06	
8660.2-AF-015	Remnant wall mastic	Interior – east wall on wood	Misc.	07	
8660.2-AF-016	Remnant wall mastic	Interior – east wall on wood	Misc.	07	
8660.2-AF-017	Door infill caulk	Interior	Misc.	08	
8660.2-AF-018	Door infill caulk	Interior	Misc.	08	
8660.2-AF-019	Flashing sealant	Exterior siding	Misc.	09	
8660.2-AF-020	Flashing sealant	Exterior siding	Misc.	09	
8660.2-AF-021	Window frame caulk	Exterior windows	Misc.	10	
8660.2-AF-022	Window frame caulk	Exterior windows	Misc.	10	
8660.2-AF-023	Corrugated metal siding sealant	Exterior siding	Misc.	11	
8660.2-AF-024	Corrugated metal siding sealant	Exterior siding	Misc.	11	
8660.2-AF-025	Screw gasket	Exterior siding and roof	Misc.	12	

Sample	Material	Location	AHERA Type	HM	Result
8660.2-AF-026	Screw gasket	Exterior siding and roof	Misc.	12	
Winch Building					
8660.2-AF-027	Blue sheet flooring	Electrical room	Misc.	13	
8660.2-AF-028	Blue sheet flooring	Electrical room	Misc.	13	
8660.2-AF-029	Screw gasket	Exterior siding and roof	Misc.	14	
8660.2-AF-030	Screw gasket	Exterior siding and roof	Misc.	14	
Water Treatment Building					
8660.2-AF-031	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	15	
8660.2-AF-032	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	15	
8660.2-AF-033	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	15	
8660.2-AF-034	Screw gasket	Exterior siding and roof	Misc.	16	
8660.2-AF-035	Screw gasket	Exterior siding and roof	Misc.	16	
Tank farm					
8660.2-AF-036	Remnant caulk	Tank #1	Misc.	17	
8660.2-AF-037	Remnant caulk	Tank #1	Misc.	17	
8660.2-AF-038	Black flange gasket	Tank #2	Misc.	18	
8660.2-AF-039	Black flange gasket	Tank #3	Misc.	18	
8660.2-AF-040	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #4	TSI	19	
8660.2-AF-041	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #4	TSI	19	
8660.2-AF-042	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #4	TSI	19	
8660.2-AF-043	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #5	TSI	20	
8660.2-AF-044	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #5	TSI	20	

Sample	Material	Location	AHERA Type	HM	Result
8660.2-AF-045	Canvas pipe wrap and white sealant over fiberglass and foam insulation	Tank #5	TSI	20	
8660.2-AF-046	Black flange gasket	Tank #5	Misc.	21	
8660.2-AF-047	Black flange gasket	Tank #5	Misc.	21	
Paint Building					
8660.2-AF-048	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	22	
8660.2-AF-049	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	22	
8660.2-AF-050	White plastic with mastic and fiberglass batt insulation	Walls and Ceiling	TSI	22	
8660.2-AF-051	Green pipe flange gasket	Interior piping (north wall)	Misc.	23	
8660.2-AF-052	Green pipe flange gasket	Interior piping (north wall)	Misc.	23	
8660.2-AF-053	Siding caulk	Exterior siding and window frame	Misc.	24	
8660.2-AF-054	Siding caulk	Exterior siding and window frame	Misc.	24	
Conex Building					
8660.2-AF-055	Silver paint on GWB wall	Interior wall- north conex	Surfacing	25	
8660.2-AF-056	Silver paint on GWB wall	Interior wall- north conex	Surfacing	25	
8660.2-AF-057	Silver paint on GWB wall	Interior wall- north conex	Surfacing	25	
8660.2-AF-058	Fibrous corrugated wall	Interior walls- north conex	Misc.	26	
8660.2-AF-059	Fibrous corrugated wall	Interior walls- north conex	Misc.	26	
8660.2-AF-060	Un-textured GWB system	Interior wall- north conex	Misc.	27	
8660.2-AF-061	Un-textured GWB system	Interior wall- north conex	Misc.	27	
8660.2-AF-062	Caulk on interior walls and ceiling seams	Interior- north conex	Misc.	28	
8660.2-AF-063	Caulk on interior walls and ceiling seams	Interior- north conex	Misc.	28	
8660.2-AF-064	Roof sealant	North conex	Misc.	29	
8660.2-AF-065	Roof sealant	North conex	Misc.	29	

SEATTLE ASBESTOS TEST

Lynnwood Laboratory: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel: 425.673.9850, Fax: 425.673.9810, NVLAP Lab Code: 200768-0

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ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton | Client: Med-Tox, Northwest | Address: PO Box 1446, Aubum, WA 98071-1446

Job#: 8660.2 | Batch#: 202213008 | Date Received: 9/1/2023

Samples Rec'd: 65 | Date Analyzed: 9/5/2023 | Samples Analyzed: 65

Project Loc.: Harrison Ave Shipyard Bellingham, WA

Analyzed by: Xingping Lin/ CiCi Xu

Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
1	8660.2-AF-001	1	White plastic		None detected	Plastic		None detected
		2	Clear mastic		None detected	Mastic/binder	4	Cellulose
		3	Yellow fibrous material		None detected	Filler	90	Glass fibers
2	8660.2-AF-002	1	White plastic		None detected	Plastic		None detected
		2	Clear mastic		None detected	Mastic/binder	3	Cellulose
		3	Yellow fibrous material		None detected	Filler	89	Glass fibers
3	8660.2-AF-003	1	White plastic		None detected	Plastic		None detected
		2	Clear mastic		None detected	Mastic/binder	4	Cellulose
		3	Yellow fibrous material		None detected	Filler	91	Glass fibers
4	8660.2-AF-004	1	Trace white powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	25	Cellulose
5	8660.2-AF-005	1	Trace white powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	26	Cellulose
6	8660.2-AF-006	1	Trace white powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	24	Cellulose
7	8660.2-AF-007	1	Gray sandy/brittle material with paint		None detected	Sand, Filler, Binder, Paint	4	Cellulose
8	8660.2-AF-008	1	Gray sandy/brittle material with paint		None detected	Sand, Filler, Binder, Paint	3	Cellulose
9	8660.2-AF-009	1	Black soft/elastic material		None detected	Binder, Filler	4	Cellulose
10	8660.2-AF-010	1	Black soft/elastic material		None detected	Binder, Filler	3	Cellulose
11	8660.2-AF-011	1	Black asphaltic material		None detected	Asphalt/binder	3	Cellulose
12	8660.2-AF-012	1	Black asphaltic material		None detected	Asphalt/binder	4	Cellulose

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ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.:	Anthony Fullerton	**Client:**	Med-Tox, Northwest	**Address:**	PO Box 1446, Auburn, WA 98071-1446
Job#:	8660.2	**Batch#:**	202213008	**Date Received:**	9/1/2023
Samples Rec'd:	65	**Date Analyzed:**	9/5/2023	**Samples Analyzed:**	65
Project Loc.:	Harrison Ave Shipyard Bellingham, WA				

Xingping Lin/ CiCi Xu — **Analyzed by:** Steve (Fanyao) Zhang

SZhang — **Approved Signatory:** Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
13	8660.2-AF-013	1	Tan fibrous material with paint		None detected	Filler, Paint	90	Cellulose
14	8660.2-AF-014	1	Tan fibrous material with paint		None detected	Filler, Paint	89	Cellulose
15	8660.2-AF-015	1	Clear/gray mastic		None detected	Mastic/binder	4	Cellulose
16	8660.2-AF-016	1	Clear/gray mastic		None detected	Mastic/binder	3	Cellulose
17	8660.2-AF-017	1	White soft/elastic material		None detected	Binder, Filler	4	Cellulose
18	8660.2-AF-018	1	White soft/elastic material		None detected	Binder, Filler	5	Cellulose
19	8660.2-AF-019	1	White soft/elastic material		None detected	Binder, Filler	4	Cellulose
20	8660.2-AF-020	1	White soft/elastic material		None detected	Binder, Filler	3	Cellulose
21	8660.2-AF-021	1	Yellow/clear brittle material		None detected	Filler, Binder	2	Cellulose
22	8660.2-AF-022	1	Yellow/clear brittle material		None detected	Filler, Binder	3	Cellulose
23	8660.2-AF-023	1	Gray/clear soft/elastic material		None detected	Binder, Filler	4	Cellulose
24	8660.2-AF-024	1	Gray/clear soft/elastic material		None detected	Binder, Filler	3	Cellulose
25	8660.2-AF-025	1	Trace silver paint		None detected	Paint, Filler	4	Cellulose
		2	Black soft/elastic material		None detected	Binder, Filler	3	Cellulose
26	8660.2-AF-026	1	Trace silver paint		None detected	Paint, Filler	4	Cellulose
		2	Black soft/elastic material		None detected	Binder, Filler	5	Cellulose
27	8660.2-AF-027	1	Blue sheet vinyl		None detected	Vinyl/binder		None detected
		2	Tan woven fibrous material with mastic		None detected	Filler, Binder	20	Cellulose, Glass fibers
28	8660.2-AF-028	1	Blue sheet vinyl		None detected	Vinyl/binder		None detected
		2	Tan woven fibrous material with mastic		None detected	Filler, Binder	20	Cellulose, Glass fibers
29	8660.2-AF-029	1	Black soft/elastic material		None detected	Binder, Filler	5	Cellulose

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ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton | Client: Med-Tox, Northwest | Address: PO Box 1446, Auburn, WA 98071-1446

Job#: 8660.2 | Batch#: 202213008 | Date Received: 9/1/2023

Samples Rec'd: 65 | Date Analyzed: 9/5/2023 | Samples Analyzed: 65

Project Loc.: Harrison Ave Shipyard Bellingham, WA

Analyzed by: Xingping Lin/ CiCi Xu

Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
30	8660.2-AF-030	1	Black soft/elastic material		None detected	Binder, Filler	4	Cellulose
31	8660.2-AF-031	1	White plastic		None detected	Plastic		None detected
		2	Clear mastic		None detected	Mastic/binder	4	Cellulose
		3	Yellow fibrous material		None detected	Filler	90	Glass fibers
32	8660.2-AF-032	1	White plastic		None detected	Plastic		None detected
		2	Clear mastic		None detected	Mastic/binder	3	Cellulose
		3	Yellow fibrous material		None detected	Filler	88	Glass fibers
33	8660.2-AF-033	1	White plastic		None detected	Plastic		None detected
		2	Clear mastic		None detected	Mastic/binder	3	Cellulose
		3	Yellow fibrous material		None detected	Filler	88	Glass fibers
34	8660.2-AF-034	1	Black soft/elastic material		None detected	Binder, Filler	4	Cellulose
35	8660.2-AF-035	1	Black soft/elastic material		None detected	Binder, Filler	3	Cellulose
36	8660.2-AF-036	1	White soft/elastic material		None detected	Binder, Filler	4	Cellulose
		2	Brown wood block		None detected	Wood aggregates	3	Cellulose
37	8660.2-AF-037	1	White soft/elastic material		None detected	Binder, Filler	4	Cellulose
		2	Brown wood block		None detected	Wood aggregates	3	Cellulose
38	8660.2-AF-038	1	Black soft/elastic material		None detected	Binder, Filler	5	Cellulose
		2	Clear soft/elastic material		None detected	Binder, Filler	3	Cellulose
39	8660.2-AF-039	1	Black soft/elastic material		None detected	Binder, Filler	4	Cellulose
		2	Clear soft/elastic material		None detected	Binder, Filler	2	Cellulose
40	8660.2-AF-040	1	Off-white soft/elastic material with debris		None detected	Binder, Filler	5	Cellulose
		2	White woven fibrous material		None detected	Filler, Binder	68	Cellulose, Glass fibers

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[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton | Client: Med-Tox, Northwest | Address: PO Box 1446, Auburn, WA 98071-1446

Job#: 8660.2 | Batch#: 202213008 | Date Received: 9/1/2023

Samples Rec'd: 65 | Date Analyzed: 9/5/2023 | Samples Analyzed: 65

Project Loc.: Harrison Ave Shipyard, Bellingham, WA

Analyzed by: Xingping Lin/ CiCi Xu | Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
40	8660.2-AF-040	3	White soft/elastic material		None detected	Binder, Filler	4	Cellulose
		4	Black foamy material		None detected	Synthetic foam		None detected
41	8660.2-AF-041	1	Off-white soft/elastic material with debris		None detected	Binder, Filler	5	Cellulose
		2	White woven fibrous material		None detected	Filler, Binder	67	Cellulose, Glass fibers
		3	White soft/elastic material		None detected	Binder, Filler	4	Cellulose
		4	Black foamy material		None detected	Synthetic foam		None detected
42	8660.2-AF-042	1	Off-white soft/elastic material with debris		None detected	Binder, Filler	4	Cellulose
		2	White woven fibrous material		None detected	Filler, Binder	65	Cellulose, Glass fibers
		3	White soft/elastic material		None detected	Binder, Filler	3	Cellulose
		4	Black foamy material		None detected	Synthetic foam		None detected
43	8660.2-AF-043	1	Off-white soft/elastic material with debris		None detected	Binder, Filler	4	Cellulose
		2	White woven fibrous material		None detected	Filler, Binder	67	Cellulose, Glass fibers
		3	White soft/elastic material		None detected	Binder, Filler	3	Cellulose
		4	Black foamy material		None detected	Synthetic foam		None detected
44	8660.2-AF-044	1	Beige/gray brittle material		None detected	Filler, Binder	2	Cellulose
		2	White woven fibrous material		None detected	Filler, Binder	64	Cellulose, Glass fibers
		3	White soft/elastic material		None detected	Binder, Filler	3	Cellulose
		4	Green foamy material		None detected	Synthetic foam		None detected
45	8660.2-AF-045	1	Beige/gray brittle material		None detected	Filler, Binder	2	Cellulose
		2	White woven fibrous material		None detected	Filler, Binder	65	Cellulose, Glass fibers

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Samples Rec'd: 65 | Date Analyzed: 9/5/2023 | Samples Analyzed: 65

Project Loc.: Harrison Ave Shipyard, Bellingham, WA

Analyzed by: Xingping Lin/ CiCi Xu

Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
45	8660.2-AF-045	3	White soft/elastic material		None detected	Binder, Filler	3	Cellulose
		4	Green foamy material		None detected	Synthetic foam		None detected
46	8660.2-AF-046	1	Black soft/elastic material		None detected	Binder, Filler	4	Cellulose
47	8660.2-AF-047	1	Black soft/elastic material		None detected	Binder, Filler	3	Cellulose
48	8660.2-AF-048	1	White plastic		None detected	Plastic		None detected
		2	Clear mastic		None detected	Mastic/binder	4	Cellulose
		3	Yellow fibrous material		None detected	Filler	85	Glass fibers
49	8660.2-AF-049	1	White plastic		None detected	Plastic		None detected
		2	Clear mastic		None detected	Mastic/binder	4	Cellulose
		3	Yellow fibrous material		None detected	Filler	86	Glass fibers
50	8660.2-AF-050	1	White plastic		None detected	Plastic		None detected
		2	Clear mastic		None detected	Mastic/binder	3	Cellulose
		3	Yellow fibrous material		None detected	Filler	84	Glass fibers
51	8660.2-AF-051	1	Green brittle material with fibrous material		None detected	Filler, Binder	7	Cellulose
52	8660.2-AF-052	1	Green brittle material with fibrous material		None detected	Filler, Binder	7	Cellulose
53	8660.2-AF-053	1	White soft/elastic material		None detected	Binder, Filler	4	Cellulose
54	8660.2-AF-054	1	White soft/elastic material		None detected	Binder, Filler	5	Cellulose
55	8660.2-AF-055	1	Silver paint		None detected	Paint, Filler	4	Cellulose
		2	Black brittle material with paint		None detected	Filler, Binder, Paint	2	Cellulose
		3	Trace white powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		4	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	25	Cellulose

SEATTLE ASBESTOS TEST

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Job#: 8660.2 | Batch#: 202213008 | Date Received: 9/1/2023

Samples Rec'd: 65 | Date Analyzed: 9/5/2023 | Samples Analyzed: 65

Project Loc.: Harrison Ave Shipyard Bellingham, WA

Analyzed by: Xingping Lin/ CiCi Xu | Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
56	8660.2-AF-056	1	Silver paint		None detected	Paint, Filler	4	Cellulose
		2	Trace brown brittle material with paint		None detected	Filler, Binder, Paint	2	Cellulose
		3	Trace white powdery material with paint and paper		None detected	Binder/filler, Paint	35	Cellulose
		4	Gray soft/elastic material		None detected	Binder, Filler	4	Cellulose
57	8660.2-AF-057	1	Silver paint		None detected	Paint, Filler	4	Cellulose
		2	Trace brown brittle material with paint		None detected	Filler, Binder, Paint	2	Cellulose
		3	Trace white powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		4	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	27	Cellulose
58	8660.2-AF-058	1	White brittle/rigid material with woven fibrous material and paint		None detected	Filler, Binder, Fine particles	65	Cellulose, Glass fibers
		2	Brown mastic		None detected	Mastic/binder	4	Cellulose
59	8660.2-AF-059	1	White brittle/rigid material with woven fibrous material and paint		None detected	Filler, Binder, Fine particles	67	Cellulose, Glass fibers
		2	Brown mastic		None detected	Mastic/binder	3	Cellulose
60	8660.2-AF-060	1	Blue brittle material with paint		None detected	Filler, Binder, Paint	2	Cellulose
		2	Trace brown brittle material with paint		None detected	Filler, Binder, Paint	2	Cellulose
		3	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	26	Cellulose
61	8660.2-AF-061	1	Brown brittle material with paint		None detected	Filler, Binder, Paint	2	Cellulose
		2	Trace silver paint		None detected	Paint, Filler	4	Cellulose
		3	Gray brittle material with paint		None detected	Filler, Binder, Paint	2	Cellulose
		4	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	24	Cellulose

SEATTLE ASBESTOS TEST

Lynnwood Laboratory: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel: 425.673.9850, Fax: 425.673.9810, NVLAP Lab Code: 200768-0

Disclaimer: This report must not be used by the client to claim product certification, approval, or endorsement by Seattle Asbestos Test, LLC, NVLAP, NIST, or any agency of the Federal government.

ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton **Client:** Med-Tox, Northwest **Address:** PO Box 1446, Auburn, WA 98071-1446

Job#: 8660.2 **Batch#:** 202213008 **Date Received:** 9/1/2023

Samples Rec'd: 65 **Date Analyzed:** 9/5/2023 **Samples Analyzed:** 65

Project Loc.: Harrison Ave Shipyard Bellingham, WA

Xingping Lin/ CiCi Xu

Analyzed by: Steve (Fanyao) Zhang

SZhang

Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
62	8660.2-AF-062	1	White soft/elastic material with paint		**None detected**	Binder, Filler, Paint	4	Cellulose
		2	Clear mastic		**None detected**	Mastic/binder	5	Cellulose
63	8660.2-AF-063	1	White soft/elastic material with paint		**None detected**	Binder, Filler, Paint	3	Cellulose
		2	Clear mastic		**None detected**	Mastic/binder	5	Cellulose
64	8660.2-AF-064	1	Gray soft/elastic material	3	**Chrysotile**	Filler, Binder	3	Cellulose
65	8660.2-AF-065	1	Gray soft/elastic material	3	**Chrysotile**	Filler, Binder	4	Cellulose

Appendix F
Analytical Reports- Lead

EMSL Analytical, Inc.
6340 CastlePlace Dr., Indianapolis, IN 46250
Phone/Fax: (317) 803-2997 / (317) 803-3047
http://www.EMSL.com indianapolislab@emsl.com

EMSL Order: 162320295
CustomerID: MEDT50
CustomerPO:
ProjectID:

Attn: **Anthony Fullerton**
Med-Tox Northwest
PO Box 1446
Auburn, WA 98071

Phone: (253) 351-0677
Fax: (253) 351-0688
Received: 9/5/2023 09:47 AM
Collected: 8/30/2023

Project: **8660.2**

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client SampleDescription	*Collected*	*Analyzed*	*Weight*	*RDL*	*Lead Concentration*
8066.2-AF-01PB *162320295-0001*	8/30/2023	9/8/2023 Site: INTERIOR Desc: WALL, GWB, MULTI-COLOR	0.2512 g	80 ppm	<80 ppm
8066.2-AF-02PB *162320295-0002*	8/30/2023	9/8/2023 Site: INTERIOR Desc: WALL, GWB, WHITE	0.2524 g	80 ppm	<80 ppm
8066.2-AF-03PB *162320295-0003*	8/30/2023	9/8/2023 Site: INTERIOR SLAB Desc: FLOOR, CONCRETE, MULTI-COLOR	0.2582 g	80 ppm	<80 ppm
8066.2-AF-04PB *162320295-0004*	8/30/2023	9/8/2023 Site: TANK #1 Desc: EXTERIOR, STEEL, BEIGE	0.0857 g	230 ppm	<230 ppm
8066.2-AF-05PB *162320295-0005*	8/30/2023	9/8/2023 Site: TANK #5 Desc: EXTERIOR, STEEL, BEIGE/YELLOW	0.1924 g	2600 ppm	140000 ppm
8066.2-AF-06PB *162320295-0006*	8/30/2023	9/8/2023 Site: TANK #8 Desc: EXTERIOR, STEEL, BLACK	0.2517 g	80 ppm	630 ppm
8066.2-AF-07PB *162320295-0007*	8/30/2023	9/8/2023 Site: NORTH CONEX INTERIOR Desc: WALL, GWB, MULTI-COLOR	0.2541 g	80 ppm	<80 ppm

Aleksandrea Kuchenbrod

Aleksandrea Kuchenbrod, Inorganic Chemistry
Lab Manager
or other approved signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted.
* Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.008% wt based on the minimum sample weight per our SOP. "<" (less than) result signifies the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. Definitions of modifications are available upon request.

Samples analyzed by EMSL Analytical, Inc. Indianapolis, IN AIHA LAP, LLC-ELLAP Accredited #157245, OH E10040

Initial report from 09/12/2023 07:38:17

OrderID: 162320295

Lead (Pb) Chain of Custody

EMSL Order ID *(Lab Use Only)*:

162320295

PHONE:
FAX:

Company: Med-Tox NW		**EMSL-Bill to:** ☐ Different ☐ Same If Bill to is Different note instructions in Comments** *Third Party Billing requires written authorization from third party*	
Street: P.O.BOX 1446			
City: Auburn	**State/Province:** WA	**Zip/Postal Code:** 98071	**Country:** USA
Report To (Name): Anthony Fullerton		**Telephone #:** 253.351.0677	
Email Address: fullertona@medtoxnw.com		**Fax #:**	**Purchase Order:**
Project Name/Number: 86602		**Please Provide Results:** ☐ FAX ☐ E-mail ☐ Mail	
U.S. State Samples Taken: WA		**CT Samples:** ☐ Commercial/Taxable ☐ Residential/Tax Exempt	

Turnaround Time (TAT) Options* - Please Check

☐ 3 Hour | ☐ 6 Hour | ☐ 24 Hour | ☐ 48 Hour | ☐ 72 Hour | ☐ 96 Hour | ☒ 1 Week | ☐ 2 Week

**Analysis completed in accordance with EMSL's Terms and Conditions located in the Price Guide*

Matrix	Method	Instrument	Reporting Limit	Check
Chips ☐ % by wt. ☐ mg/cm² ☒ ppm	SW846-7000B	Flame Atomic Absorption	0.01%	☒
Air	NIOSH 7082	Flame Atomic Absorption	4 µg/filter	☐
	NIOSH 7105	Graphite Furnace AA	0.03 µg/filter	☐
	NIOSH 7300 modified	ICP-AES/ICP-MS	0.5 µg/filter	☐
Wipe* ASTM ☐ non ASTM ☐ *if no box is checked, non-ASTM Wipe is assumed	SW846-7000B	Flame Atomic Absorption	10 µg/wipe	☐
	SW846-6010B or C	ICP-AES	1.0 µg/wipe	☐
	SW846-7000B/7010	Graphite Furnace AA	0.075 µg/wipe	☐
TCLP	SW846-1311/7000B/SM 3111B	Flame Atomic Absorption	0.4 mg/L (ppm)	☐
	SW846-1131/SW846-6010B or C	ICP-AES	0.1 mg/L (ppm)	☐
Soil	SW846-7000B	Flame Atomic Absorption	40 mg/kg (ppm)	☐
	SW846-7010	Graphite Furnace AA	0.3 mg/kg (ppm)	☐
	SW846-6010B or C	ICP-AES	2 mg/kg (ppm)	☐
Wastewater Unpreserved ☐ Preserved with HNO_3 pH < 2 ☐	SM3111B/SW846-7000B	Flame Atomic Absorption	0.4 mg/L (ppm)	☐
	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	☐
	EPA 200.7	ICP-AES	0.020 mg/L (ppm)	☐
Drinking Water Unpreserved ☐ Preserved with HNO_3 pH < 2 ☐	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	☐
	EPA 200.8	ICP-MS	0.001 mg/L (ppm)	☐
TSP/SPM Filter	40 CFR Part 50	ICP-AES	12 µg/filter	☐
	40 CFR Part 50	Graphite Furnace AA	3.6 µg/filter	☐
Other:				☐

Name of Sampler: A Fullerton **Signature of Sampler:**

Sample #	Location	Volume/Area	Date/Time Sampled
86602-	AF- 01Pb		8/30/23
	02Pb		
	03Pb	See Table	
	04Pb		
	05Pb		
	06Pb		
86602-	AF- 07Pb		8/30/23

Client Sample #'s **Total # of Samples:** 7

Relinquished (Client): **Date:** 9/1/23 **Time:** 1115

Received (Lab): **Date:** 9/5/23 **Time:** 9:47

Comments:

Page 1 of 1 pages

Table 3. Summary of Bulk Paint Chip Sample Results.

Sample Number	Location	Component	Substrate	Color	Result (%wt*)
Paint Shop Building					
8066.2-AF-01PB	Interior	Wall	GWB	Multi-color	
8066.2-AF-02PB	Interior	Wall	GWB	White	
8066.2-AF-03PB	Interior slab	Floor	Concrete	Multi-color	
Tank Farm					
8066.2-AF-04PB	Tank #1	Exterior	Steel	Beige	
8066.2-AF-05PB	Tank #5	Exterior	Steel	Beige/yellow	
8066.2-AF-06PB	Tank #8	Exterior	Steel	Black	
Conex Building					
8066.2-AF-07PB	North Conex interior	Wall	GWB	Multi-color	

%wt= percent in weight

Appendix G
EMSL Analytical Inc. Laboratory Certification

AIHA Laboratory Accreditation Programs, LLC

acknowledges that

EMSL Analytical, Inc.

6340 Castleplace Drive Indianapolis, IN 46250

Laboratory ID: LAP-157245

along with all premises from which key activities are performed, as listed above, has fulfilled the requirements of the AIHA Laboratory Accreditation Programs (AIHA LAP), LLC accreditation to the ISO/IEC 17025:2017 international standard, General Requirements for the Competence of Testing and Calibration Laboratories in the following:

LABORATORY ACCREDITATION PROGRAMS

☑	**INDUSTRIAL HYGIENE**	Accreditation Expires: June 01, 2025
☑	**ENVIRONMENTAL LEAD**	Accreditation Expires: June 01, 2025
☑	**ENVIRONMENTAL MICROBIOLOGY**	Accreditation Expires: June 01, 2025
☐	**FOOD**	Accreditation Expires:
☐	**UNIQUE SCOPES**	Accreditation Expires:

Specific Field(s) of Testing (FoT)/Method(s) within each Accreditation Program for which the above named laboratory maintains accreditation is outlined on the attached Scope of Accreditation. Continued accreditation is contingent upon successful on-going compliance with ISO/IEC 17025:2017 and AIHA LAP, LLC requirements. This certificate is not valid without the attached Scope of Accreditation. Please review the AIHA LAP, LLC website (www.aihaaccreditedlabs.org) for the most current Scope.

Cheryl O. Morton

Cheryl O Morton
Managing Director, AIHA Laboratory Accreditation Programs, LLC

Revision21: 05/15/2023

Date Issued: 06/01/2023

AIHA Laboratory Accreditation Programs, LLC

SCOPE OF ACCREDITATION

EMSL Analytical, Inc.
6340 Castleplace Drive Indianapolis, IN 46250

Laboratory ID: LAP-157245
Issue Date: 06/01/2023

The laboratory is approved for those specific field(s) of testing/methods listed in the table below. Clients are urged to verify the laboratory's current accreditation status for the particular field(s) of testing/Methods, since these can change due to proficiency status, suspension and/or withdrawal of accreditation.

The EPA recognizes the AIHA LAP, LLC ELLAP program as meeting the requirements of the National Lead Laboratory Accreditation Program (NLLAP) established under Title X of the Residential Lead-Based Paint Hazard Reduction Act of 1992 and includes paint, soil and dust wipe analysis. Air and composited wipes analyses are not included as part of the NLLAP.

Environmental Lead Laboratory Accreditation Program (ELLAP)

Initial Accreditation Date: 09/01/2002

Component, parameter or characteristic tested	Technology sub-type/Detector	Method	Method Description *(for internal methods only)*
Airborne Dust	AA	NIOSH 7082	N/A
Paint	AA	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 7000B	N/A
	ICP	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 6010D	N/A
Settled Dust by Wipe	AA	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 7000B	N/A
	ICP	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 6010D	N/A
Soil	AA	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 7000B	N/A

Component, parameter or characteristic tested	Technology sub-type/Detector	Method	Method Description *(for internal methods only)*
	ICP	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 6010D	N/A

A complete listing of currently accredited ELLAP laboratories is available on the AIHA LAP, LLC website at:
http://www.aihaaccreditedlabs.org

Appendix H
PCB Results

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

September 18, 2023

Anthony Fullerton
MED-TOX Northwest
P.O. Box 1146
Auburn, WA 98071

Re: Analytical Data for Project 8660.2
Laboratory Reference No. 2309-017

Dear Anthony:

Enclosed are the analytical results and associated quality control data for samples submitted on September 5, 2023.

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

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

Sincerely,

David Baumeister
Project Manager

Enclosures

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

Date of Report: September 18, 2023
Samples Submitted: September 5, 2023
Laboratory Reference: 2309-017
Project: 8660.2

Case Narrative

Samples were collected on August 30, 2023 and received by the laboratory on September 5, 2023. They were maintained at the laboratory at a temperature of 2°C to 6°C.

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

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

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

Date of Report: September 18, 2023
Samples Submitted: September 5, 2023
Laboratory Reference: 2309-017
Project: 8660.2

PCBs EPA 8082A

Matrix: Solid
Units: mg/Kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**8660.2-AF-01PCB**					
Laboratory ID:	09-017-01					
Aroclor 1016	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*63*	*50-127*				
Client ID:	**8660.2-AF-02PCB**					
Laboratory ID:	09-017-02					
Aroclor 1016	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*83*	*50-127*				
Client ID:	**8660.2-AF-03PCB**					
Laboratory ID:	09-017-03					
Aroclor 1016	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*73*	*50-127*				

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

Date of Report: September 18, 2023
Samples Submitted: September 5, 2023
Laboratory Reference: 2309-017
Project: 8660.2

PCBs EPA 8082A

Matrix: Soil
Units: mg/Kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**8660.2-AF-04PCB**					
Laboratory ID:	09-017-04					
Aroclor 1016	**ND**	0.51	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.51	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.51	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.51	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.51	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	0.51	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.51	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.51	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.51	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*66*	*50-127*				
Client ID:	**8660.2-AF-05PCB**					
Laboratory ID:	09-017-05					
Aroclor 1016	**ND**	0.43	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.43	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.43	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.43	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.43	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	0.43	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.43	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.43	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.43	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*91*	*50-127*				
Client ID:	**8660.2-AF-06PCB**					
Laboratory ID:	09-017-06					
Aroclor 1016	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.74	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*87*	*50-127*				

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

Date of Report: September 18, 2023
Samples Submitted: September 5, 2023
Laboratory Reference: 2309-017
Project: 8660.2

PCBs EPA 8082A

Matrix: Soil
Units: mg/Kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**8660.2-AF-07PCB**					
Laboratory ID:	09-017-07					
Aroclor 1016	**ND**	0.83	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.83	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.83	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.83	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.83	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	0.83	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.83	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.83	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.83	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*91*	*50-127*				
Client ID:	**8660.2-AF-08PCB**					
Laboratory ID:	09-017-08					
Aroclor 1016	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**0.65**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.54	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*78*	*50-127*				
Client ID:	**8660.2-AF-09PCB**					
Laboratory ID:	09-017-09					
Aroclor 1016	**ND**	0.53	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.53	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.53	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.53	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.53	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	0.53	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.53	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.53	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.53	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*82*	*50-127*				

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

Date of Report: September 18, 2023
Samples Submitted: September 5, 2023
Laboratory Reference: 2309-017
Project: 8660.2

PCBs EPA 8082A

Matrix: Soil
Units: mg/Kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**8660.2-AF-10PCB**					
Laboratory ID:	09-017-10					
Aroclor 1016	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.56	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	1.4	EPA 8082A	9-7-23	9-7-23	U1
Aroclor 1260	**ND**	1.4	EPA 8082A	9-7-23	9-7-23	U1
Aroclor 1262	**ND**	1.4	EPA 8082A	9-7-23	9-7-23	U1
Aroclor 1268	**ND**	1.4	EPA 8082A	9-7-23	9-7-23	U1
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*83*	*50-127*				
Client ID:	**8660.2-AF-11PCB**					
Laboratory ID:	09-017-11					
Aroclor 1016	**ND**	0.59	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.59	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.59	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.59	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.59	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	0.59	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.59	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.59	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.59	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*78*	*50-127*				

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

Date of Report: September 18, 2023
Samples Submitted: September 5, 2023
Laboratory Reference: 2309-017
Project: 8660.2

PCBs EPA 8082A
QUALITY CONTROL

Matrix: Solid
Units: mg/Kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB0907S1					
Aroclor 1016	**ND**	0.050	EPA 8082A	9-7-23	9-7-23	
Aroclor 1221	**ND**	0.050	EPA 8082A	9-7-23	9-7-23	
Aroclor 1232	**ND**	0.050	EPA 8082A	9-7-23	9-7-23	
Aroclor 1242	**ND**	0.050	EPA 8082A	9-7-23	9-7-23	
Aroclor 1248	**ND**	0.050	EPA 8082A	9-7-23	9-7-23	
Aroclor 1254	**ND**	0.050	EPA 8082A	9-7-23	9-7-23	
Aroclor 1260	**ND**	0.050	EPA 8082A	9-7-23	9-7-23	
Aroclor 1262	**ND**	0.050	EPA 8082A	9-7-23	9-7-23	
Aroclor 1268	**ND**	0.050	EPA 8082A	9-7-23	9-7-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*74*	*50-127*				

Analyte	Result		Spike Level		Source Result	Percent Recovery		Recovery Limits	RPD	RPD Limit	Flags
MATRIX SPIKES											
Laboratory ID:	08-333-01										
	MS	MSD	MS	MSD		MS	MSD				
Aroclor 1260	**0.413**	**0.384**	0.500	0.500	ND	**83**	**77**	41-121	7	28	
Surrogate:											
DCB						*79*	*73*	*50-127*			

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

OnSite Environmental Inc.

Data Qualifiers and Abbreviations

A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.

B - The analyte indicated was also found in the blank sample.

C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.

E - The value reported exceeds the quantitation range and is an estimate.

F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.

H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.

I - Compound recovery is outside of the control limits.

J - The value reported was below the practical quantitation limit. The value is an estimate.

K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.

L - The RPD is outside of the control limits.

M - Hydrocarbons in the gasoline range are impacting the diesel range result.

M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

N1 - Hydrocarbons in diesel range are impacting lube oil range results.

O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.

P - The RPD of the detected concentrations between the two columns is greater than 40.

Q - Surrogate recovery is outside of the control limits.

S - Surrogate recovery data is not available due to the necessary dilution of the sample.

T - The sample chromatogram is not similar to a typical _____.

U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.

U1 - The practical quantitation limit is elevated due to interferences present in the sample.

V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.

W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.

X - Sample extract treated with a mercury cleanup procedure.

X1 - Sample extract treated with a sulfuric acid/silica gel cleanup procedure.

X2 - Sample extract treated with a silica gel cleanup procedure.

Y - The calibration verification for this analyte exceeded the 20% drift specified in methods 8260 & 8270, and therefore the reported result should be considered an estimate. The overall performance of the calibration verification standard met the acceptance criteria of the method.

Y1 - Negative effects of the matrix from this sample on the instrument caused values for this analyte in the bracketing continuing calibration verification standard (CCVs) to be outside of 20% acceptance criteria. Because of this, quantitation limits and sample concentrations should be considered estimates.

Z -

ND - Not Detected at PQL
PQL - Practical Quantitation Limit
RPD - Relative Percent Difference

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

Chain of Custody

Page 1 of 2

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

Laboratory Number: 09-017

npany: MTNW
ject Number: 8660.2
ject Name: Harrison Ave Shipyard
ject Manager: A. Fullerton
mpled by:

Turnaround Request (in working days)
(Check One)
☐ Same Day ☐ 1 Day
☐ 2 Days ☐ 3 Days
☑ Standard (7 Days) (TPH analysis 5 Days)
☐ _____ (other)

ID	Sample Identification	Date Sampled	Time Sampled	Matrix	Number of Containers	NWTPH-HCID	NWTPH-Gx/BTEX	NWTPH-Gx	NWTPH-Dx	Volatiles 8260C	Halogenated Volatiles 8260C	Semivolatiles 8270D/SIM (with low-level PAHs)	PAHs 8270D/SIM (low-level)	PCBs 8082A	Organochlorine Pesticides 8081B	Organophosphorus Pesticides 8270D/SIM	Chlorinated Acid Herbicides 8151A	Total RCRA Metals	Total MTCA Metals	TCLP Metals	HEM (oil and grease) 1664A	% Moisture
1	8660.2-AF- 01PCB	8/30/23		Solid	1									X								
2	02PCB				1									X								
3	03PCB				1									X								
4	04PCB				1									X								
5	05PCB				1									X								
6	06PCB				1									X								
7	07PCB				1									X								
8	08PCB				1									X								
9	09PCB				1									X								
10	8660.2-AF- 10PCB	8/30/23		Solid	1									X								

	Signature	Company	Date	Time
Relinquished		MTNW	9/1/23	1100
Received		OSE	9/5/23	1500
Relinquished				
Received				
Relinquished				
Received				

Comments/Special Instructions

Reviewed/Date

Reviewed/Date

Chromatograms with final report ☐

Data Package: Standard ☐ Level III ☐ Level IV ☐

Electronic Data Deliverables (EDDs) ☐ _____

Chain of Custody

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

Company: MTNW
Project Number: 9660.2
Project Name: Harrison Ave Shipyard
Project Manager: A. Fullerton
Sampled by: A. Fullerton

Turnaround Request (in working days)
(Check One)
☐ Same Day ☐ 1 Day
☐ 2 Days ☐ 3 Days
☑ Standard (7 Days)
(TPH analysis 5 Days)
☐ _____ (other)

Laboratory Number: 09-017

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	Number of Containers	NWTPH-HCID	NWTPH-Gx/BTEX	NWTPH-Gx	NWTPH-Dx	Volatiles 8260C	Halogenated Volatiles 8260C	Semivolatiles 8270D/SIM (with low-level PAHs)	PAHs 8270D/SIM (low-level)	PCBs 8082A	Organochlorine Pesticides 8081B	Organophosphorus Pesticides 8270D/SIM	Chlorinated Acid Herbicides 8151A	Total RCRA Metals	Total MTCA Metals	TCLP Metals	HEM (oil and grease) 1664A					
11	9660.2-AS-11 PCB	8/30/23		Solid	1									X												

	Signature	Company	Date	Time	Comments/Special Instructions
Relinquished		MTNW	9/1/23	1100	
Received		OSE	9/5/23	1500	
Relinquished					
Received					
Relinquished					
Received					
Reviewed/Date		Reviewed/Date			Chromatograms with final report ☐

Data Package: Standard ☐ Level III ☐ Level IV ☐ Electronic Data Deliverables (EDDs) ☐ _____

Appendix I
On-Site Analytical Accreditation

The State of Washington Department of Ecology

OnSite Environmental, Inc.

Redmond, WA

has complied with provisions set forth in Chapter 173-50 WAC and is hereby recognized by the Department of Ecology as an ACCREDITED LABORATORY for the analytical parameters listed on the accompanying Scope of Accreditation.

This certificate is effective July 27, 2023 and shall expire July 26, 2024.

Witnessed under my hand on August 11, 2023.

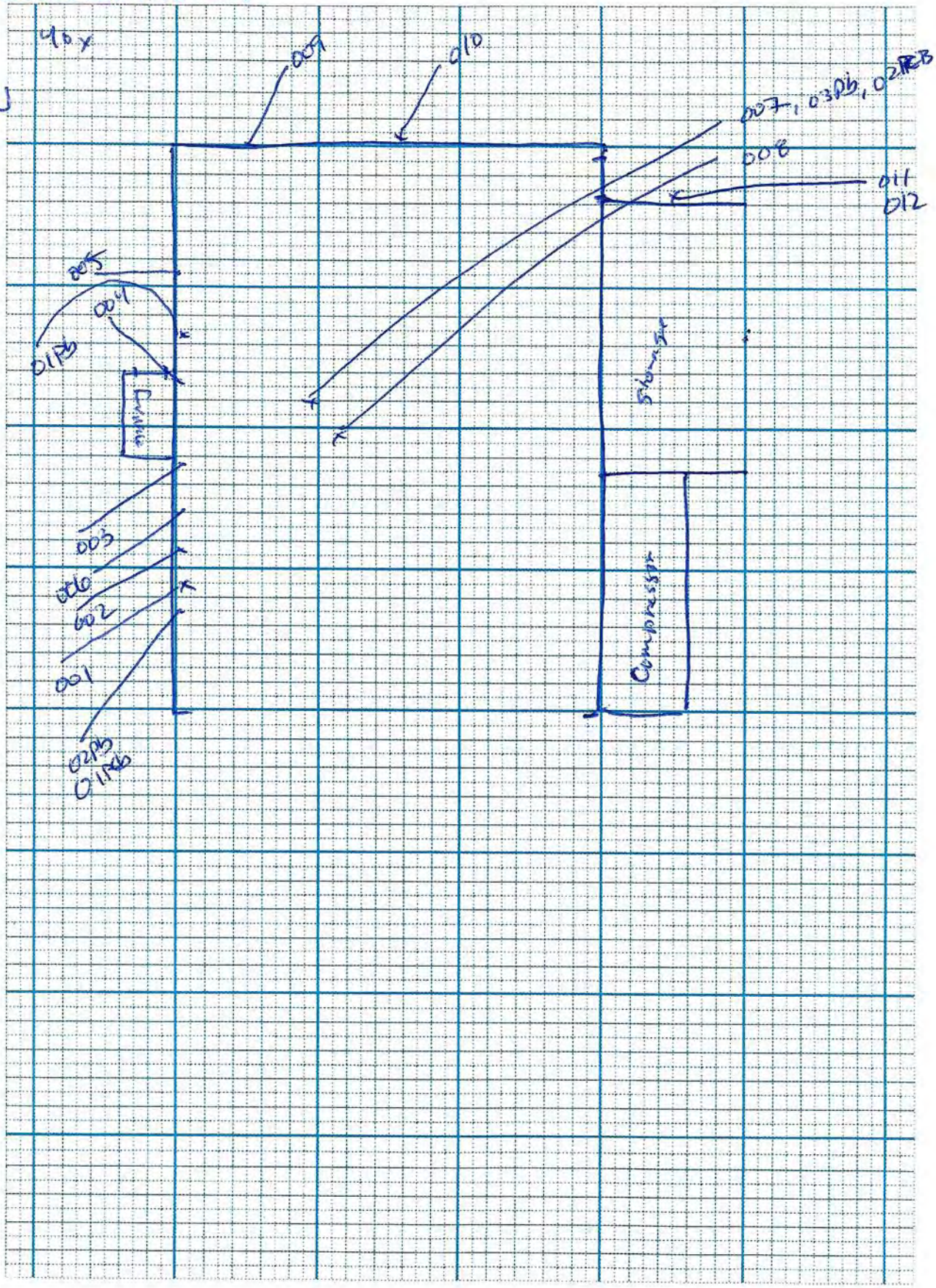
Rebecca Wood
Lab Accreditation Unit Supervisor

Laboratory ID
C591

Appendix J
Sample Location Drawings

MED-TOX NORTHWEST Occupational and Environmental Health e-mail medtoxnw@msn.com	Client Aspect Consulting	Project No. 8660.2
	Project Harris Ave Shipyard	
	Dwg. Name Paint Shop	
	Date 8/30/23	Dwg. No.	Sheet 1 of 6

Block Scale 1/10" = 1'

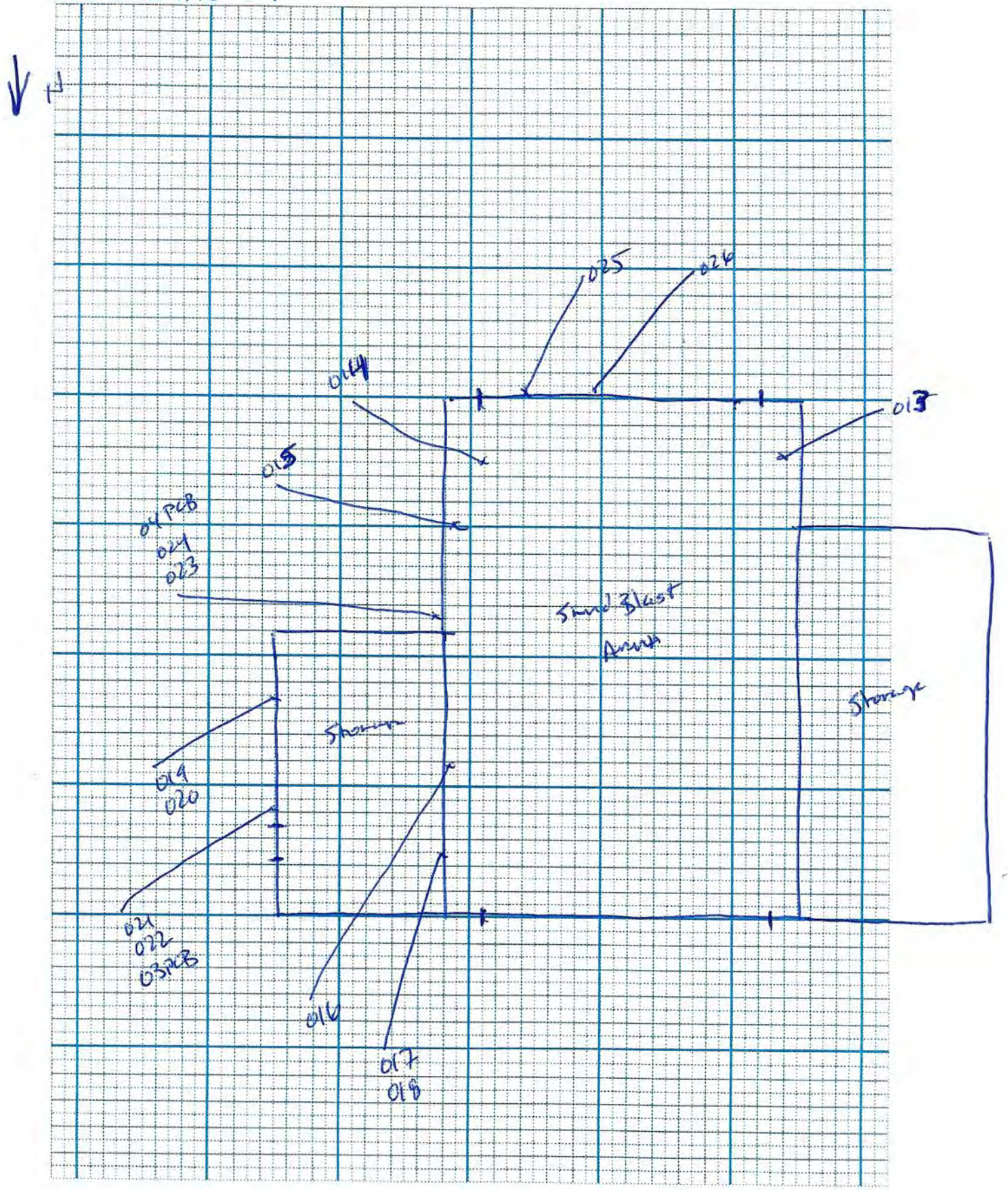


MED-TOX NORTHWEST
Occupational and Environmental Health

e-mail medtoxnw@msn.com

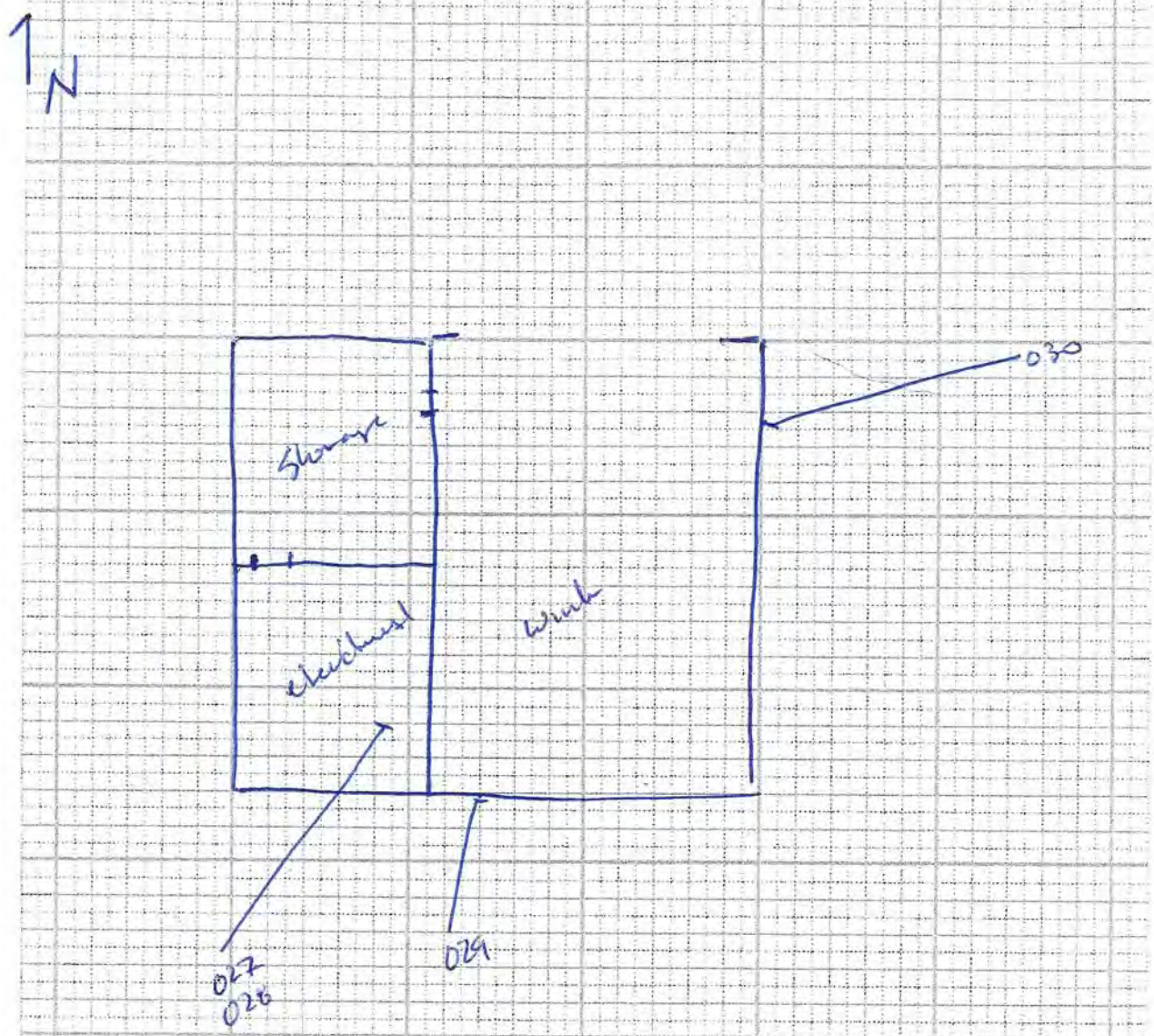
Client Aspect Consulting		Project No. 86602
Project Harris Ave Shipyard		
Dwg. Name Sand Blast Shed		
Date 8/30/23	Dwg. No.	Sheet 2 of 6

Block Scale 1/10" = 1'



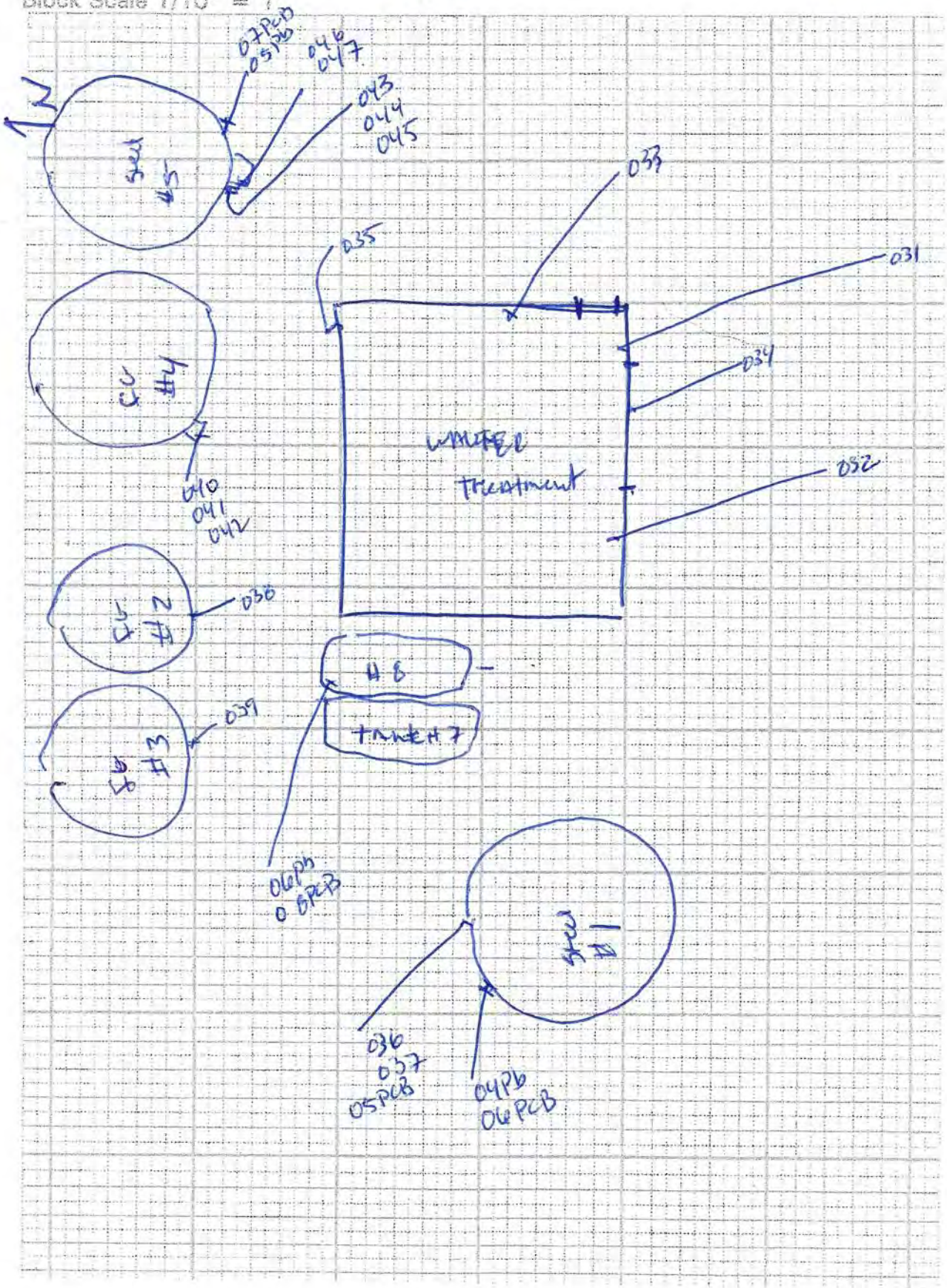
MED-TOX NORTHWEST Occupational and Environmental Health e-mail medtoxnw@msn.com	Client Aspect Consulting		Project No. 8660.2
	Project (Harris Ave Shipyard)		
	Dwg. Name Winch House		
	Date 8/30/23	Dwg. No.	Sheet 3 of 6

Block Scale 1/10" = 1'



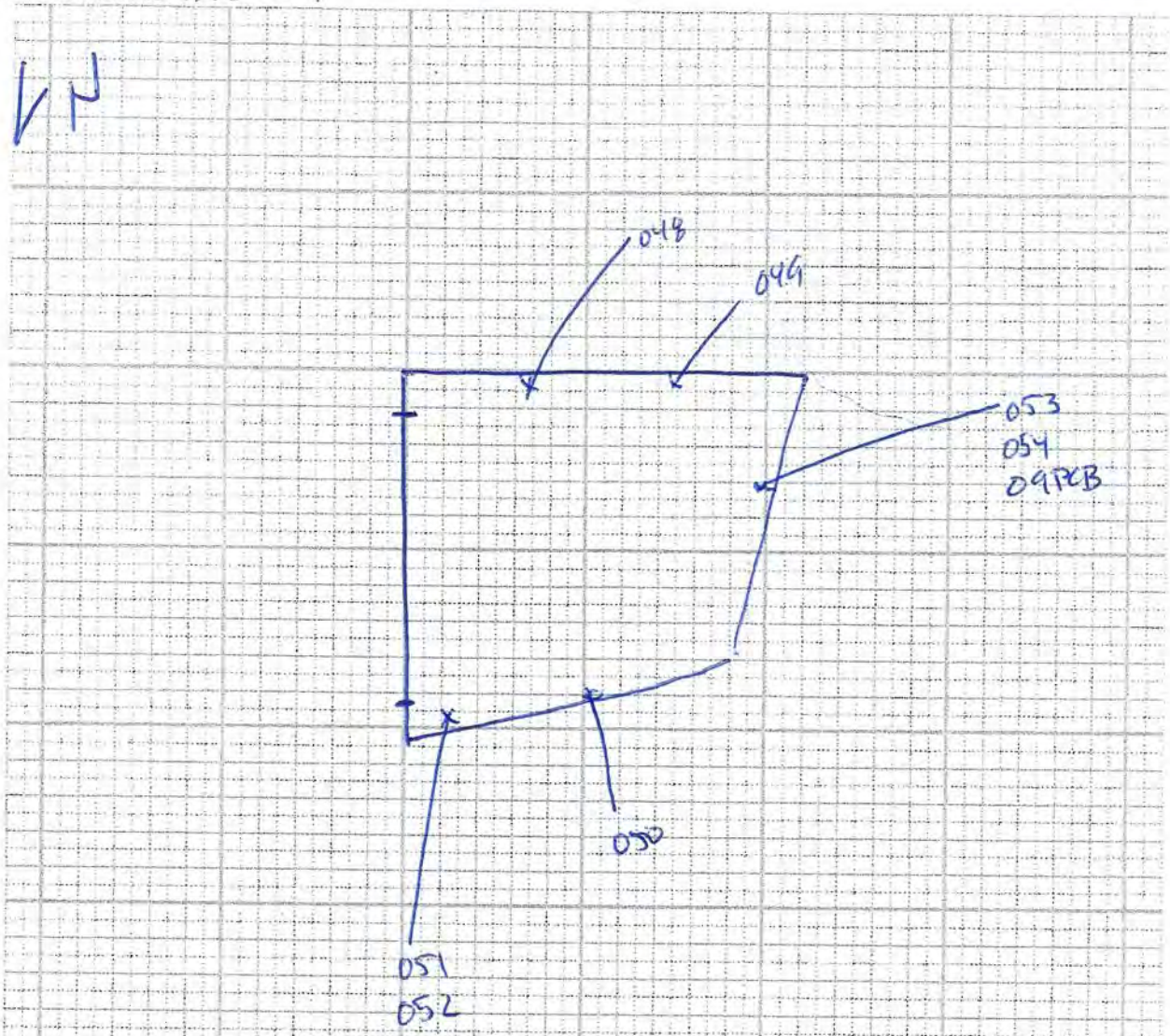
MED-TOX NORTHWEST Occupational and Environmental Health	Client	Aspect Consulting	Project No. 8660.2
	Project	Harris Ave Shipyard	
	Dwg. Name	Tank Farm & WATER TREATMENT Bldg	
e-mail medtoxnw@msn.com	Date 8/30/23	Dwg. No.	Sheet 4 of 6

Block Scale 1/10" = 1'



MED-TOX NORTHWEST Occupational and Environmental Health e-mail medtoxnw@msn.com	Client Aspect Consulting		Project No. 8660.2
	Project Harris Ave Shipyard		
	Dwg. Name Paint Building		
	Date 8/30/23	Dwg. No.	Sheet 5 of 6

Block Scale 1/10" = 1'

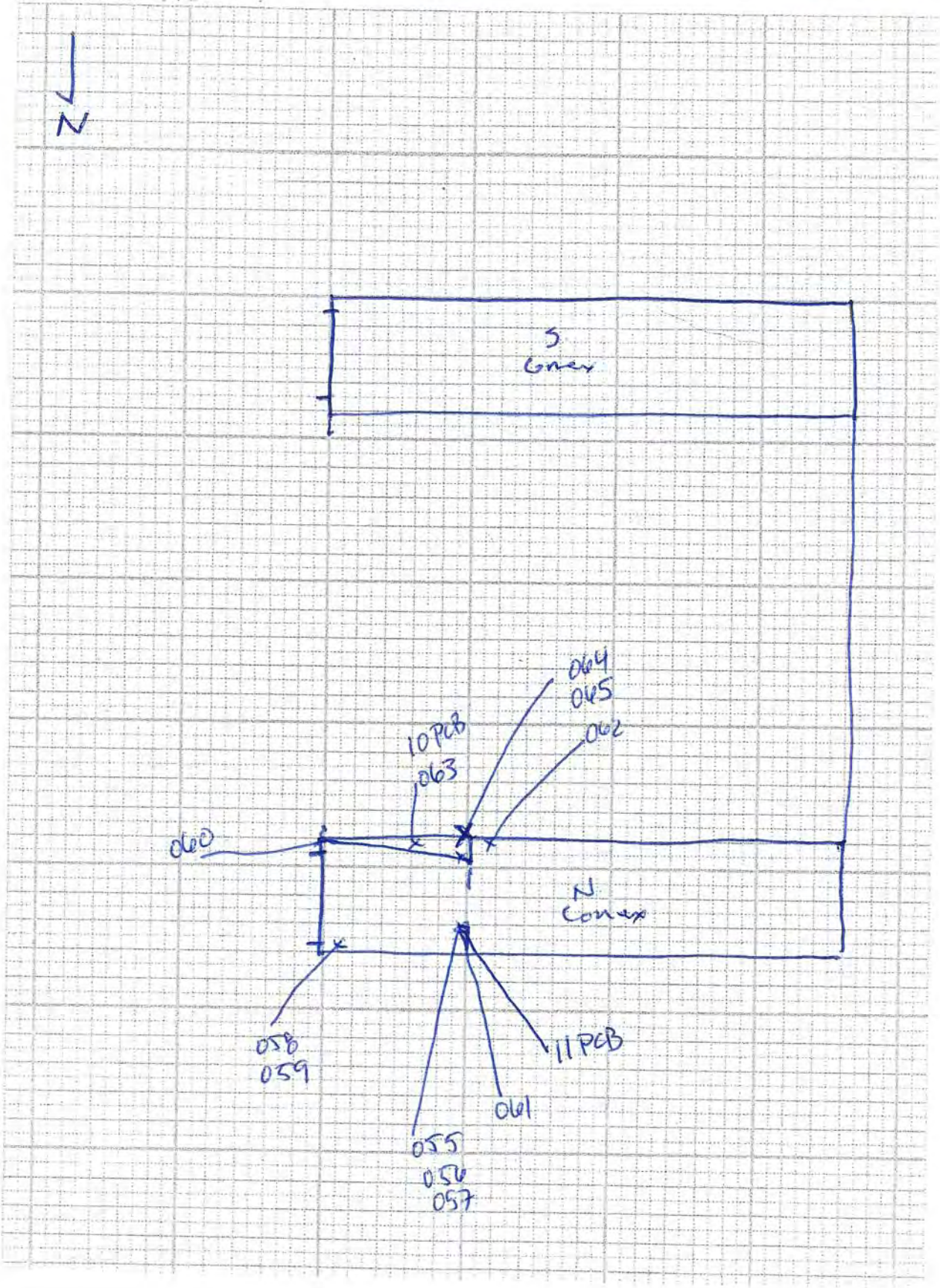


MED-TOX NORTHWEST
Occupational and Environmental Health

e-mail medtoxnw@msn.com

Client Aspect Consulting		Project No. 8660.2
Project Harris Ave Shipyard		
Dwg. Name Conex Building		
Date 8/30/23	Dwg. No.	Sheet 6 of 6

Block Scale 1/10" = 1'



SAFE ENVIRONMENT OF AMERICA, INC. dba
MED-TOX NORTHWEST

September 22, 2025

Colin Eng
WSP
33301 Ninth Avenue South, Suite 300
Federal Way, Washington 98003-2600

Subject: Harris Avenue Shipyard Hazardous Building Materials Survey
Shipping and Receiving Building, Fuel Storage Building and Used Oil Storage Building
201 Harris Avenue, Bellingham, Washington
Med-Tox Northwest Proposal No. 9113.2a

Dear Mr. Eng,

On September 17, 2025, Anthony Fullerton of Med-Tox Northwest (MTNW) conducted site visit to sample potential asbestos containing materials, lead in paint coatings and polychlorinated biphenyls (PCBs) of the shipping/receiving building, fuel storage building and used oil storage building located at the former Harris Avenue Shipyard in Bellingham, Washington. The initial site visit (August 2023) was completed for most of the buildings on the site. These remaining buildings were not part of the initial scope of work. The following buildings were included in the survey activities:

- Shipping and Receiving Building - Construction date unknown. Single story shop building +/- 1,000 square feet (SF) with a 272 SF shipping container attached to the east side for additional storge. This wood framed building is finished with corrugated metal siding and roofing. The floor is finished concrete. The interior of the building is finished with gypsum wallboard (GWB) system over fiberglass batt insulation. Rooms in the building include an office area, main shop area, mezzanine storage space and additional container storage space. The building is wired for electricity and there is an electric furnace for heating
- Fuel Storage Building - Construction date unknown. The concrete masonry unit (CMU) constructed as a three walled building that is approximately 100 SF with concrete parapet and concrete floor. The roof is steel framed and covered with corrugated metal sheeting.
- Used Oil Storage Building- Construction date unknown. The building has metal framed walls with corrugated sheet metal siding and roof. It is approximately 400 SF in size. The floor is finished concrete with a small concrete parapet wall.

Asbestos Bulk Sampling Summary

There were twenty-three (23) samples collected from eleven (11) homogeneous materials (HM) identified. One material was determined to contain asbestos by laboratory analysis. These include:

- **Silver coat paint over sealant (HM's 08 and 09).** This material is located on the roof of the shipping container located on the east side of the building. At the time of the survey, the inspector identified two separate HM's silver coat paint HM-08 and sealant HM-09. Three samples were collected and submitted to the laboratory for analysis. **This material was analyzed to contain 3% Chrysotile asbestos.** The laboratory determined these materials were inseparable from one another, therefore there is only one layer in the analytical report.

There was one additional material; CMU grout (HM-10) located on the fuel storage building that was determined to contain 2% Chrysotile asbestos in the two samples collected. The samples were reanalyzed by the more stringent 400 Point Count method to contain 0.25% to 0.50% asbestos or less than 1% which is below the regulatory limit. All other samples collected and analyzed were determined to be negative for asbestos.

For a complete list of all samples collected from both site visits please refer to the attached Summary of Materials Sampled for Asbestos table.

The purpose of the survey was to provide a "good faith survey" (per Washington Administrative Code (WAC) 296-62-07721, (1)(c)(ii)) and to identify the materials stated above which may require removal and/or special handling before any demolition activities.

Northwest Clean Air Agency (NWCAA) also requires compliance with AHERA's survey and sampling requirements. This applies to any renovation or demolition activities where suspected ACM may be disturbed. NWCAA is a local agency that receives statutory authority from the U.S. Environmental Protection Agency (EPA) to enforce environmental regulations.

Med-Tox Northwest employs inspectors certified by an Environmental Protection Agency (EPA)-approved training provider to provide Asbestos Hazard Emergency Response Act (AHERA) building surveys, including renovation and demolition surveys. A copy of Mr. Fullerton's certificate is attached.

Table 1 provides a complete list of suspect material determined greater than 1% asbestos in the Med-Tox Northwest sampling conducted at the Former Harris Avenue Shipyard.

Table 1. Summary of Asbestos Containing Materials

Material	Location	Friable	Quantity
Shipping and Receiving Building			
Silver coat paint over sealant (HM's 08 and 09)	Shipping container roof	No	120 LF
Fuel Storage Building			
There were no asbestos containing materials identified.			
Used Oil Storage Building			
There were no asbestos containing materials identified.			

LF= linear feet. Note: This table is not to be used without the complete survey document including appendices for additional information.

Table 2 lists all suspect materials sampled that have been determined to be non-asbestos containing.

Table 2. Summary of Suspect Materials Determined Non-Asbestos Containing

Material Description	Material Description
Shipping and Receiving Building	
White plastic with mastic and fiberglass batt insulation (HM-01)	Heavy textured GWB system (HM-02)
Un-textured GWB system (HM-03)	White window frame caulk (HM-04)
Screw gasket (HM-05)	Wood wall seam sealant (HM-06)
Black tar roof sealant (HM-07)	
Used Oil Storage Building	
Screw gasket (HM-11)	

Note: This table is not to be used without the complete survey document including appendices for additional information.

Table 3 lists all suspected materials sampled that have been determined <1% asbestos-containing.

Table 3. Summary of Suspect Materials Determined <1%-Asbestos.

Material Description	Location
CMU mortar (HM-10)	Exterior walls

Note: This table is not to be used without the complete survey document including appendices for additional information.

The material identified in **Table 3** was found to contain 1% Chrysotile or less asbestos. Materials with asbestos content 1% or less will require special handling during removal and/or demolition as detailed in Washington Industrial Safety and Health Act (WISHA) Regional Directive (WRD) 23.10, *Occupational Exposure to Asbestos*.

Lead-Based Paint Summary

Lead was commonly used in most paint products until 1978, when it was banned from residential paints at concentrations greater than 600 parts per million (ppm); however, commercial applications with lead were still utilized and are still available. Lead is poisonous to the human body and presents a potential health hazard during any kind of disturbance (such as maintenance, including grinding, welding, and cutting) and if improperly disposed, where lead can enter drinking water supplies.

EPA defines LBP as a concentration of 1.0 milligrams per centimeter squared (mg/cm^2) or greater by x-ray fluorescence (XRF) or 0.5 percent by weight (% wt.) or greater by total lead analysis; equivalent to 5,000 milligrams per kilogram (mg/kg). This EPA action level triggers requirements for protection of the environment, maintenance workers, and building occupants in child occupied facilities as defined by 40 CFR 745. Additionally, building components exceeding EPA lead levels may cause demolition waste streams to fail waste designation sampling performed for compliance with WAC 173-303.

Washington Industrial Health and Safety Act (WISHA) worker protection regulations has not defined a minimum concentration for regulating lead, and has clarified that lead at any detectable concentration shall be considered regulated by WAC 296-155-176, Lead. Paint sample results can be expressed in mg/kg (same as ppm), % wt. or mg/cm^2 by area depending on the type of analytical methods used. Any positive result, regardless of the reporting method by the laboratory, will require compliance with WAC 296-155-176.

Lead in Painted Surfaces

Interior painted surfaces were tested for LBP using bulk sample collection and chemical analysis. A total of three paint chip samples were collected. Analytical results are provided in **Table 4**.

Table 4. Summary of Bulk Paint Chip Sample Results

Sample Number	Location	Component	Substrate	Color	Result (% wt.)
9113.2a-AF-01PB	Interior	Wall	GWB	White	<0.0064
9113.2a-AF-02PB	Interior	Window frame and sill	Wood	White	<0.0064
9113.2a-AF-03PB	Entry way	Exterior wall	Wood	Tan/beige	<0.0064

% wt. = percent in weight. The WISHA worker protection regulations have stated that lead at any detectable concentration shall be considered regulated WAC 296-155-176, Lead.

Other Hazardous Building Materials

Chlorofluorocarbons

MTNW inspected the building for cooling systems with potential chlorofluorocarbons (CFCs), there were none observed.

PCB Light Ballasts and Fluorescent Light Tubes

Older fluorescent light ballasts have small capacitors that may contain high concentrations of PCBs. Nearly all ballasts manufactured before 1979 contain PCBs. All ballasts manufactured after July 1, 1978 that do not contain PCBs are required to be clearly marked "No PCBs". Unmarked ballasts or ballasts without a date code should be assumed to be PCB ballasts. PCBs are toxic chemicals according to the EPA. While there is only a small amount, about one ounce, of PCBs in each light ballast capacitor, but there are a large number of ballasts in the United States. About half of the one billion ballasts, estimated as currently installed, were manufactured before 1979 and usually contain PCBs. A "No PCB" label means there are less than 50 ppm PCBs however, in the state of Washington PCB in oils are regulated at 2 ppm (WAC 173-303-9904). Ballasts manufactured after 1978/79 may contain a PCB replacement called Di (2-ethylhexyl) phthalate (DEHP), a probable human carcinogen. DEHP, a clear, odorless, synthetic compound, is often used as a plasticizer. By 1985, most manufacturers had stopped using DEHP in ballasts for 4-foot fixtures but continued to use it for most 8-foot and high intensity discharge fixtures until 1991. In any case, ballasts should not be disassembled for disposal but collected and sent to a treatment, storage or disposal facility certified by the state/EPA for disposal of PCBs and/or DEHP.

Fluorescent light fixtures were observed. These fixtures were not inspected due to being in use and Ecology's recommendation to properly manage all light ballasts. Therefore, all light fixtures are assumed to contain PCB light ballasts; light tubes are assumed to contain mercury. Additionally smoke detectors may be regulated as universal or hazardous waste and will require dismantling and special handling. **Table 5** provides a summary of these items:

Table 5. Summary of Fluorescent Lights and Smoke Detectors

Location	8-foot, 2-bulb	4-foot, 4-bulb	4-foot, 3-bulb	4-foot, 2-bulb	Smoke detectors
Shipping and Receiving	9	0	0	4	0
Total	**9**	**0**	**0**	**4**	**0**

Typically, there is one ballast for every two-light tube in a fluorescent light fixture; accordingly, there are approximately 13 ballasts in the light fixtures requiring recycling or PCB hazardous waste disposal. There are also 26 light tubes that will need to be recycled during demolition.

Mercury Containing Switches

Heating system thermostats were investigated for mercury containing systems. There was one mercury-containing thermostat observed in the Shipping and Receiving building.

Summary of Analysis

Asbestos-Containing Materials

Bulk samples were analyzed by polarized light microscopy (PLM) dispersion staining EPA Method 600/R-93/116 by Seattle Asbestos Test, LLC. (SAT). There were two (2) samples re-analyzed using PLM EPA method 600/R- 93/600 400 Point Count. SAT is accredited through the National Voluntary Laboratory Accreditation Program (NVLAP) administered by the National Institute of Standards and Technology (NIST), a division of the U. S. Department of Commerce. This accreditation does not constitute endorsement, but rather a finding of laboratory competence. The NVLAP participant number for SAT is 200768-0 (a certification copy is attached). Analytical results are attached.

Lead-Based Paint

Bulk paint chip samples were submitted to EMSL Analytical, Inc., for analysis. A total of three paint chip samples were analyzed for lead using atomic absorption spectroscopy (AAS) to determine the presence and percentage of lead. Procedures for analyzing metals are found in the ASTM International D-3335-78 and EPA Method Manual SW-846, Method 6010. (EMSL used SW 846 3050B*/7000B) an equivalent analytical method.

Analytical results for paint chip samples and EMSL Analytical, Inc., laboratory certification are attached.

Comments and Recommendations

Asbestos-Containing Materials

Med-Tox Northwest recommends, and state law requires that all asbestos materials identified in **Table 1** be removed prior to demolition or disturbance.

Med-Tox Northwest recommends that this survey report be placed on-site during renovation and/or demolition and copies provided to the contractor(s) bidding and performing work. Washington Industrial Safety and Health Act (WISHA), Occupational Safety and Health Administration (OSHA) and NWCAA require that the report be on-site and available for review during the entire project duration.

Lead-Based Paint

The samples collected for lead were determined to be negative. For lead, any percentage of lead in the material should be an assumed risk to human health. All painted surfaces should be assumed to contain at least trace levels of lead in paint, therefore requiring compliance with WAC 296-155-176 during any disturbance of painted surfaces. The WISHA criteria are used to determine if materials are hazardous during a demolition.

PCB

During demolition, the asbestos abatement contractor should be tasked with dismantling light fixtures, collecting all lighting ballasts for proper disposal, and recycling the light tubes. Ballasts without "No-PCB" labels are considered PCB-containing and must be disposed of as hazardous waste. "No-PCB" ballasts may designate as Washington Dangerous Waste and should be sent to an EPA licensed facility for proper disposal. Light tubes can be recycled as a universal waste for minimal cost or must be disposed of as a hazardous waste.

Other Hazardous Building Materials

Prior to demolition, the mercury containing thermostat should be collected and recycled/disposed of appropriately.

This survey is not intended for use as abatement plans and/or specifications.

If you have any questions or require additional information, please call me at (253) 351-0677.

Sincerely,



Anthony Fullerton
Senior Project Manager

Enclosures

Table C-1. Summary of Materials Sampled for Asbestos

Sample	Material	Location	AHERA Type	HM	Result
Shipping and Receiving Building					
9113.2a-AF-001	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	ND
9113.2a-AF-002	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	ND
9113.2a-AF-003	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	ND
9113.2a-AF-004	Heavy textured GWB system	Office walls and ceiling	Surfacing	02	ND
9113.2a-AF-005	Heavy textured GWB system	Office walls and ceiling	Surfacing	02	ND
9113.2a-AF-006	Heavy textured GWB system	Office walls and ceiling	Surfacing	02	ND
9113.2a-AF-007	Un-textured GWB system	Shop wall- east	Misc.	03	ND
9113.2a-AF-008	Un-textured GWB system	Shop wall- east	Misc.	03	ND
9113.2a-AF-009	White window frame caulk	South end of building-exterior	Misc.	04	ND
9113.2a-AF-010	White window frame caulk	South end of building-exterior	Misc.	04	ND
9113.2a-AF-011	Screw gasket	Exterior siding	Misc.	05	ND
9113.2a-AF-012	Screw gasket	Exterior siding	Misc.	05	ND
9113.2a-AF-013	Wood wall seam caulk	Trailer add-on interior	Misc.	06	ND
9113.2a-AF-014	Wood wall seam caulk	Trailer add-on interior	Misc.	06	ND
9113.2a-AF-015	Black tar roof sealant	Trailer add-on roof	Misc.	07	ND
9113.2a-AF-016	Black tar roof sealant	Trailer add-on roof	Misc.	07	ND
9113.2a-AF-017	**Silver coat paint over sealant**	**Roof perimeter and cross seams**	**Surfacing/ Misc.**	**08 09**	**3% CHR**
9113.2a-AF-018	**Silver coat paint over sealant**	**Roof perimeter and cross seams**	**Surfacing/ Misc.**	**08 09**	**3% CHR**
9113.2a-AF-019	**Silver coat paint over sealant**	**Roof perimeter and cross seams**	**Surfacing/ Misc.**	**08 09**	**3% CHR**
Fuel Storage Building					
9113.2a-AF-020	CMU mortar	Walls	Misc.	10	2% CHR PC 0.25% CHR or less than 1%

Sample	Material	Location	AHERA Type	HM	Result
9113.2a-AF-021	CMU mortar	Walls	Misc.	10	2% CHR PC 0.50% CHR or less than 1%
Used Oil Storage Building					
9113.2a-AF-022	Screw gasket	North wall	Misc.	11	ND
9113.2a-AF-023	Screw gasket	North wall	Misc.	11	ND

CHR = Chrysotile, CMU = cement masonry unit, GWB = gypsum wallboard, HM = homogeneous material, Misc. = Miscellaneous, ND = none detect, PC Point Count, TSI = thermal system insulation.



Photo 1: Shipping and Receiving building facing northeast.


Photo 2: Interior of the Shipping and Receiving building facing south.



Photo 3: Roof of the shipping container used for storage in the Shipping and Receiving building. The silver coat paint and sealant are ACM.



Photo 4: ACM silver coat paint and sealant on the containing attached to the Shipping and Receiving building.



Photo 5: Fuel Storage building facing northeast. The CMU mortar contain less than 1% asbestos.

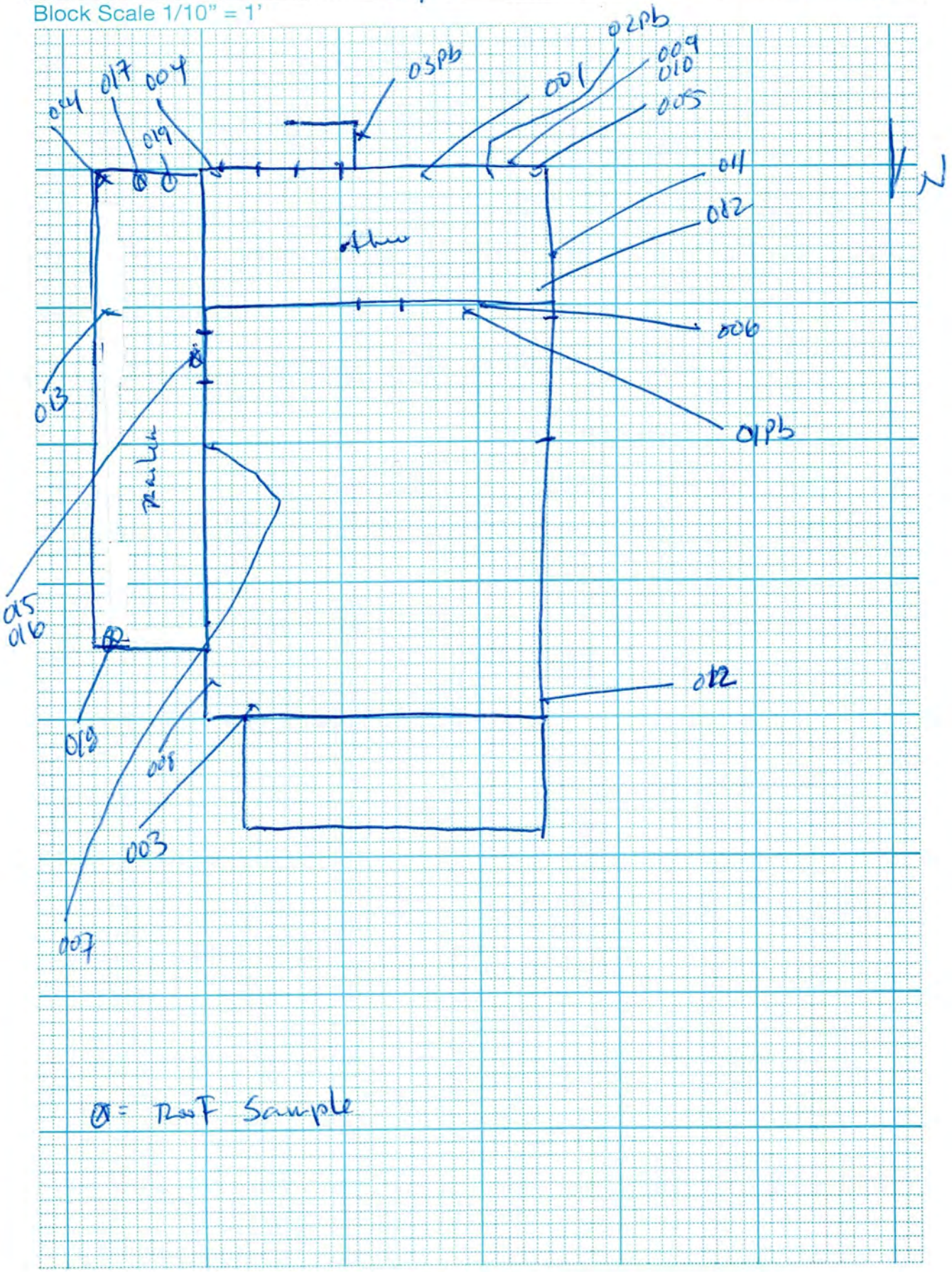


Photo 6: Used Oil Storage building facing east.

SAFE ENVIRONMENT OF AMERICA, INC. dba
MED-TOX NORTHWEST
Occupational and Environmental Health
Website: www.medtoxnw.com

Client WSP			Project No. 9113.24
Project Haris Ave Shipyard			
Dwg. Name Shipping and Receiving			
Date 9/17/25	Dwg. No.	Sheet 1	of 2

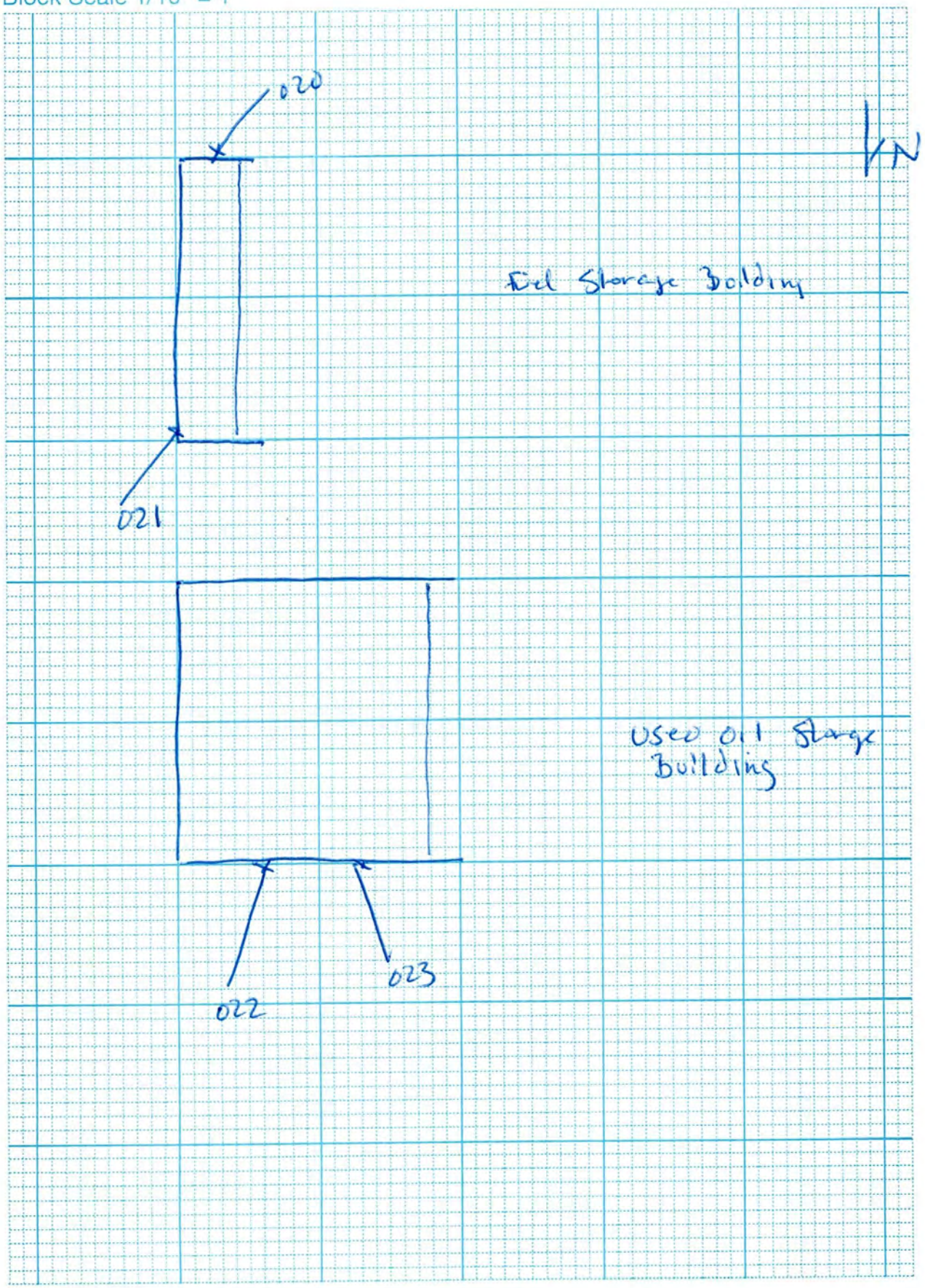
Block Scale 1/10" = 1'



SAFE ENVIRONMENT OF AMERICA, INC. dba
MED-TOX NORTHWEST
Occupational and Environmental Health
Website: www.medtoxnw.com

Client WSP		Project No. 9113.22
Project Harris Ave Shipyard		
Dwg. Name Fuel Storage and Used Oil Storage Bldgs		
Date 9/17/25	Dwg. No.	Sheet 2 of 2

Block Scale 1/10" = 1'



SEATTLE ASBESTOS TEST, LLC

Lynnwood Laboratory: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel: 425.673.9850, Cell & Text:206.369.6421, NVLAP Lab Code: 200768-0

www.seattleasbestostest.com, admin@seattleasbestostest.com

Project Manager:	Anthony Fullerton	Date Analyzed:	9/18/2025
Client:	Med-Tox, Northwest	Client Job#:	9113.2a
Address:	PO Box 1446,Auburn,WA 98071-1446	Project Location:	Harris Ave Shipyard Shipping and Receiving Bldg
Tel:	253.351.0677	Laboratory batch#:	202510518
Date Report Issued:	9/18/2025	Samples Received:	23

Enclosed please find the test results for the bulk samples submitted to our laboratory for asbestos analysis. Analysis was performed using polarized light microscopy (PLM) in accordance with Test Method US EPA - 40 CFR Appendix E of Part 763, Interim Method of Determination of Asbestos in Bulk Insulation Samples and Test Method US EPA/600/R-93/116.

Percentages for this report are done by visual estimate and relate to the suggested acceptable error ranges by the method. Since variation in data increases as the quantity of asbestos decreases toward the limit of detection, the EPA recommends point counting for samples containing between <1% and 10% asbestos (NESHAP, 40 CFR Part 61). Statistically, point counting is a more accurate method. If you feel a point count might be beneficial, please feel free to call and request one.

The test results refer only to the samples or items submitted and tested. The accuracy with which these samples represent the actual materials is totally dependent on the acuity of the person who took the samples. This report must not be used by the client to claim product certification, approval, or endorsement by Seattle Asbestos Test, LLC, NVLAP, NIST, or any agency of the Federal government. The test report or calibration certificate shall not be reproduced except in full, without written approval of the laboratory. If the sample is inhomogeneous the sub-samples of the components are analyzed separately as layers.This report in its entirety consists of this cover leter, the customer sampling COC or data sheet, and the analytical report which is page numbered.

This report is highly confidential and will not be released without your consent. Samples are archived for 30 days after the analysis, and disposed of as hazardous waste thereafter.

Thank you for using our service and let us know if we can further assist you.

Sincerely

SZhang

Steve (Fanyao) Zhang
Approved Signatory

2025/05/18

SEATTLE ASBESTOS TEST, LLC

Analyzing Quality

Lynnwood Lab: 19711 Scriber Lake Road, Suite D, WA 98036, Tel:425.673.9850, Fax:425.673.9810
Bellevue Lab: 12727 Northup Way, Suite 1, Bellevue, WA 98005, Tel:425.861.1111, Fax:425.861.1118
Email. admin@seattleasbestostest.com, Website: www.seattleasbestostest.com

CHAIN OF CUSTODY

☒ Bulk Asbestos ☐ Point Count 400 ☐ Point Count 1000 ☐ Point Count Gravimetric ☐ Other (Specify) _____

☐ 1 Hour ☐ 2 Hours ☐ Same day (4 to 6 Hrs.) ☒ 1 Day ☐ ..... Days

Med-Tox, Northwest

PO Box 1446, Auburn, WA 98071-1446 Tel: 253.351.0677 Fax: 253.351.0688

Number of Samples 23 PO# 9113.2a Project Location Harris Ave Shipyard Shipping and Receiving Bldg

Project Manager (Check one or more):

☒	Anthony Fullerton	206.356.8927	fullertona@medtoxnw.com	☐	evansc@medtoxnw.com
☐	Ginnie Kindler		kindlerg@medtoxnw.com	☐ Jon Havelock	havelockj@medtoxnw.com
☐	Judy Lurvey		lurveyj@medtoxnw.com	☐ Teresa Choate	choatet@medtoxnw.com

SEQ#	CLIENT SAMPLE #	SAMPLE DESCRIPTION	LOCATION	NOTES
1	9113.2a-AF-001			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11		See Data Sheet		
12				
13				
14				
15				
16				
17				
18				
19				
20	9113.2a-AF-023			

	Print Name	Signature	Company	Date	Time
Sampled:	A Fullerton		Med-Tox, Northwest	9/17/25	
Relinquished:	A Fullerton		Med-Tox, Northwest	9/17/25	
Delivered:			Med-Tox, Northwest		
Received:			Seattle Asbestos Test	9/17/25	13:32
Analyzed:			Seattle Asbestos Test	9/18/25	10:38
Reported:			Seattle Asbestos Test		

Seattle Asbestos Test warrants the test results to be of a precision normal for the type and methodology employed for each sample submitted and disclaims any other warrants, expressed or implied, including warranty of fitness for a particular purpose and warranty of merchantability. Seattle Asbestos Test accepts no legal responsibility for the purpose for which the client uses the test results. By signing on this form, the clients agree to relieve Seattle Asbestos Test of any liability that may arise from the test results. It is the client's responsibility to make sure the samples are appropriately taken according to federal and local regulations. Invoices paid late may be charged of interest, and invoices go to collection may be charged 17% to 25% of collection fee. NSF checks will be charged of $50.

Results reporting method: ☐ Phone ☐ Fax ☐ Email ☐ Pick-up

☐ Composite all wallboard samples ☐ Text result to phone ☐ Point count ..... % or less asbestos

Table C-1. Summary of Materials Sampled for Asbestos

Sample	Material	Location	AHERA Type	HM	Result
Shipping and Receiving Building					
9113.2a-AF-001	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	
9113.2a-AF-002	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	
9113.2a-AF-003	White plastic with mastic and fiberglass batt insulation	Ceiling	TSI	01	
9113.2a-AF-004	Heavy textured GWB system	Office walls and ceiling	Surfacing	02	
9113.2a-AF-005	Heavy textured GWB system	Office walls and ceiling	Surfacing	02	
9113.2a-AF-006	Heavy textured GWB system	Office walls and ceiling	Surfacing	02	
9113.2a-AF-007	Un-textured GWB system	Shop wall- east	Misc.	03	
9113.2a-AF-008	Un-textured GWB system	Shop wall- east	Misc.	03	
9113.2a-AF-009	White window frame caulk	South end of building-exterior	Misc.	04	
9113.2a-AF-010	White window frame caulk	South end of building-exterior	Misc.	04	
9113.2a-AF-011	Screw gasket	Exterior siding	Misc.	05	
9113.2a-AF-012	Screw gasket	Exterior siding	Misc.	05	
9113.2a-AF-013	Wood wall seam caulk	Trailer add-on interior	Misc.	06	
9113.2a-AF-014	Wood wall seam caulk	Trailer add-on interior	Misc.	06	
9113.2a-AF-015	Black tar roof sealant	Trailer add-on roof	Misc.	07	
9113.2a-AF-016	Black tar roof sealant	Trailer add-on roof	Misc.	07	
9113.2a-AF-017	Silver coat paint over sealant	Roof perimeter and cross seams	Surfacing/Misc.	08 09	
9113.2a-AF-018	Silver coat paint over sealant	Roof perimeter and cross seams	Surfacing/Misc.	08 09	
9113.2a-AF-019	Silver coat paint over sealant	Roof perimeter and cross seams	Surfacing/Misc.	08 09	
Fuel Storage Building					
9113.2a-AF-020	CMU mortar	Walls	Misc.	10	
9113.2a-AF-021	CMU mortar	Walls	Misc.	10	
Used Oil Storage Building					
9113.2a-AF-022	Screw gasket	North wall	Misc.	11	
9113.2a-AF-023	Screw gasket	North wall	Misc.	11	

SEATTLE ASBESTOS TEST

Lynnwood Laboratory: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel: 425.673.9850, Cell & Text:206.369.6421, NVLAP Lab Code: 200768-0

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ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton **Client:** Med-Tox, Northwest **Address:** PO Box 1446,Auburn,WA 98071-1446

Job#: 9113.2a **Batch#:** 202510518 **Date Received:** 9/17/2025

Samples Rec'd: 23 **Date Analyzed:** 9/18/2025 **Samples Analyzed:** 23

Project Loc.: Harris Ave Shipyard Shipping and Receiving Bldg

Analyzed by: Cici Xu Steve (Fanyao) Zhang

Approved Signatory: SZhang Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
1	9113.2a-AF-001	1	White soft/elastic material with woven fibrous material		None detected	Binder, Filler	20	Synthetic fibers
		2	Clear mastic		None detected	Mastic/binder	3	Cellulose
		3	Yellow fibrous material		None detected	Filler	88	Glass fibers
2	9113.2a-AF-002	1	White soft/elastic material with woven fibrous material		None detected	Binder, Filler	19	Synthetic fibers
		2	Clear mastic		None detected	Mastic/binder	3	Cellulose
		3	Yellow fibrous material		None detected	Filler	90	Glass fibers
3	9113.2a-AF-003	1	White soft/elastic material with woven fibrous material		None detected	Binder, Filler	21	Synthetic fibers
		2	Clear mastic		None detected	Mastic/binder	2	Cellulose
		3	Yellow fibrous material		None detected	Filler	89	Glass fibers
4	9113.2a-AF-004	1	White powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	26	Cellulose
5	9113.2a-AF-005	1	White powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	26	Cellulose
6	9113.2a-AF-006	1	White powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	27	Cellulose
7	9113.2a-AF-007	1	White powdery material		None detected	Binder/filler	35	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	25	Cellulose
8	9113.2a-AF-008	1	White powdery material		None detected	Binder/filler	35	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	24	Cellulose
9	9113.2a-AF-009	1	White soft/elastic material		None detected	Binder, Filler	2	Cellulose

SEATTLE ASBESTOS TEST

Lynnwood Laboratory: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel: 425.673.9850, Cell & Text:206.369.6421, NVLAP Lab Code: 200768-0

Disclaimer: This report must not be used by the client to claim product certification, approval, or endorsement by Seattle Asbestos Test, LLC, NVLAP, NIST, or any agency of the Federal government.

ANALYTICAL LABORATORY REPORT

[PLM] EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton **Client:** Med-Tox, Northwest **Address:** PO Box 1446,Auburn,WA 98071-1446

Job#: 9113.2a **Batch#:** 202510518 **Date Received:** 9/17/2025

Samples Rec'd: 23 **Date Analyzed:** 9/18/2025 **Samples Analyzed:** 23

Project Loc.: Harris Ave Shipyard Shipping and Receiving Bldg

Analyzed by: Cici Xu / Steve (Fanyao) Zhang

Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
10	9113.2a-AF-010	1	White soft/elastic material		None detected	Binder, Filler	3	Cellulose
11	9113.2a-AF-011	1	Black soft/elastic material		None detected	Binder, Filler	4	Cellulose
12	9113.2a-AF-012	1	Black soft/elastic material		None detected	Binder, Filler	3	Cellulose
13	9113.2a-AF-013	1	White soft/elastic material		None detected	Binder, Filler	2	Cellulose
14	9113.2a-AF-014	1	White soft/elastic material		None detected	Binder, Filler	3	Cellulose
15	9113.2a-AF-015	1	Black soft/elastic material		None detected	Binder, Filler	4	Cellulose
16	9113.2a-AF-016	1	Black soft/elastic material		None detected	Binder, Filler	3	Cellulose
17	9113.2a-AF-017	1	Silver soft material with paint	3	Chrysotile	Filler, Binder, Paint	3	Cellulose
18	9113.2a-AF-018	1	Silver soft material with paint	3	Chrysotile	Filler, Binder, Paint	2	Cellulose
19	9113.2a-AF-019	1	Silver soft material with paint	3	Chrysotile	Filler, Binder, Paint	4	Cellulose
20	9113.2a-AF-020	1	Gray sandy/brittle material	2	Chrysotile	Sand, Filler, Binder	3	Cellulose
21	9113.2a-AF-021	1	Gray sandy/brittle material	2	Chrysotile	Sand, Filler, Binder	2	Cellulose
22	9113.2a-AF-022	1	Black soft/elastic material		None detected	Binder, Filler	4	Cellulose
23	9113.2a-AF-023	1	Black soft/elastic material		None detected	Binder, Filler	3	Cellulose

SEATTLE ASBESTOS TEST

NVLAP Accreditation Lab Codes: 200768

19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel:425.673.9850, Fax:425.673.9810
4500 9th Ave., NE, Suite 300, Seattle, WA 98105
Website:www.seattleasbestostest.com, Email:admin@seattleasbestostest.com

PLM by Point Count (400 points)

Attention: Anthony Fullerton
Client: Med-Tox, Northwest
Address: PO Box 1446,Auburn,WA 98071-1446

Client Job #: 9113.2a
Laboratory Batch #: 202510532
Date Received: 9/18/2025
Samples Received: 2
Date Analyzed: 9/18/2025

Project: Harris Ave Shipyard Shipping and Receiving Bldg

Sample Requested for Point Count 9113.2a-AF- 020

Previous Analytical Information

Previously Analyzed by: Cici Xu
Previous Batch #: 202510518
Previous Lab ID: 20
Previous Description: Gray sandy/brittle material
Layer to be Point Counted: 1
Asbestos Type Found: Chrysotile
Asbestos Percentage Found: 2

Point Count Analytical Procedures New Lab ID: 1

	Asbestos Points	Non-Asbestos Points	Total Points Counted
Slide 1	0	50	50
Slide 2	0	50	50
Slide 3	0	50	50
Slide 4	1	49	50
Slide 5	0	50	50
Slide 6	0	50	50
Slide 7	0	50	50
Slide 8	0	50	50
Total	1	399	400

Point Count Summary Results

Type of Asbestos: Chrysotile
Percentage of Asbestos: 0.25%

Analyzed By: Cici Xu

Reviewed by: Steve Zhang, President

SEATTLE ASBESTOS TEST

NVLAP Accreditation Lab Codes: 200768

19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel:425.673.9850, Fax:425.673.9810
4500 9th Ave., NE, Suite 300, Seattle, WA 98105
Website:www.seattleasbestostest.com, Email:admin@seattleasbestostest.com

PLM by Point Count (400 points)

Attention: Anthony Fullerton
Client: Med-Tox, Northwest
Address: PO Box 1446,Auburn,WA 98071-1446

Client Job #: 9113.2a
Laboratory Batch #: 202510532
Date Received: 9/18/2025
Samples Received: 2
Date Analyzed: 9/18/2025

Project: Harris Ave Shipyard Shipping and Receiving Bldg

Sample Requested for Point Count 9113.2a-AF- 021

Previous Analytical Information

Previously Analyzed by: Cici Xu
Previous Batch #: 202510518
Previous Lab ID: 21
Previous Description: Gray sandy/brittle material
Layer to be Point Counted: 1
Asbestos Type Found: Chrysotile
Asbestos Percentage Found: 2

Point Count Analytical Procedures

New Lab ID: 2

	Asbestos Points	Non-Asbestos Points	Total Points Counted
Slide 1	0	50	50
Slide 2	1	49	50
Slide 3	0	50	50
Slide 4	0	50	50
Slide 5	0	50	50
Slide 6	1	49	50
Slide 7	0	50	50
Slide 8	0	50	50
Total	2	398	400

Point Count Summary Results

Type of Asbestos: Chrysotile
Percentage of Asbestos: 0.5%

Analyzed By: Cici Xu

Reviewed by: Steve Zhang, President

EMSL Analytical, Inc.

6340 Castleplace Drive, Indianapolis, IN, 46250
Telephone: 317.803.2997 Fax:317.803.3047
www.emsl.com

EMSL Order ID: 162561185
LIMS Reference ID: CD61185
EMSL Customer ID: MEDT50

Attention: Anthony Fullerton
Med-Tox Northwest [MEDT50]
PO Box 1446
Auburn, WA 98071
(253) 351-0677
fullertona@medtoxnw.com

Project Name: 9113.2A
Customer PO:
EMSL Sales Rep: Natalie Murphy
Received: 09/19/2025 10:20
Reported: 09/22/2025 08:17

Analytical Results

Analyte	Results	RL	Weight(g)	Prep Date & Tech	Prep Method	Analysis Date & Analyst	Analytical Method	Q	DF
Client Sample ID: 9113.2A-AF-01PB/WHITE PAINT ON GWB									**Date Sampled: 09/17/25**
Matrix: Chips									**LIMS Reference ID: CD61185-01**
Lead	<0.0064 % wt	0.0064 % wt	0.2588	09/19/25 CG	SW-846 3050B	09/19/25 CG	SW 846-7000B		1
Sample Comments:									
Client Sample ID: 9113.2A-AF-02PB/WHITE PAINT ON WOOD WINDOW SILL									**Date Sampled: 09/17/25**
Matrix: Chips									**LIMS Reference ID: CD61185-02**
Lead	<0.0064 % wt	0.0064 % wt	0.2539	09/19/25 CG	SW-846 3050B	09/19/25 CG	SW 846-7000B		1
Sample Comments:									
Client Sample ID: 9113.2A-AF-03PB/TAN/BEIGE PAINT ON WOOD SIDING									**Date Sampled: 09/17/25**
Matrix: Chips									**LIMS Reference ID: CD61185-03**
Lead	<0.0064 % wt	0.0064 % wt	0.2515	09/19/25 CG	SW-846 3050B	09/19/25 CG	SW 846-7000B		1
Sample Comments:									

EMSL Analytical, Inc.

6340 Castleplace Drive, Indianapolis, IN, 46250
Telephone: 317.803.2997 Fax:317.803.3047
www.emsl.com

EMSL Order ID: 162561185
LIMS Reference ID: CD61185
EMSL Customer ID: MEDT50

Attention: Anthony Fullerton
Med-Tox Northwest [MEDT50]
PO Box 1446
Auburn, WA 98071
(253) 351-0677
fullertona@medtoxnw.com

Project Name: 9113.2A

Customer PO:
EMSL Sales Rep: Natalie Murphy
Received: 09/19/2025 10:20
Reported: 09/22/2025 08:17

Certified Analyses included in this Report

Analyte	Certifications
SW 846-7000B in Chips	
Lead	16-OHDOH,16-AIHA ELLAP

List of Certifications

Code	Description	Number	Expires
16-MO	Missouri Drinking Water	10180	03/31/2026
16-NYDOH	New York Potable Water, Metals Solid and Hazardous Waste - Asbestos	12130	04/01/2026
16-AIHA ELLAP	American Industrial Hygiene Association (AIHA LAP, LLC) - ELLAP	157245	08/01/2027
16-AIHA IHLAP	American Industrial Hygiene Association (AIHA LAP, LLC) - IHLAP	157245	08/01/2027
16-CA ELAP	California Metals in DW, Chemistry and Bulk Asbestos in Hazardous Waste	2575	06/30/2026
16-A2LA Food	A2LA Food Microbiology	2845.11	01/31/2026
16-A2LA Chemistry	A2LA Environmental and Chemistry	2845.25	11/30/2025
16-IN Metals/Asbestos	Indiana Lead and Metals and Asbestos in Drinking Water	C-49-09	12/31/2026
16-OHDOH	Ohio - Lead in Paint Chips, Wipes, Soil and Air	E10040	05/03/2026
16-FLDOH	Florida Asbestos and Metals in Drinking Water, PCBs	E871170	06/30/2026
16-NJDEP	New Jersey Metals, Organics and Inorganics in DW PCBs	IN002	06/30/2026
16-IN Colilert/HPC	Indiana Colilert and HPC	M-49-06	12/31/2026

Please see the specific Field of Testing (FOT) on www.emsl.com <http://www.emsl.com> for a complete listing of parameters for which EMSL is certified.

Notes and Definitions

Item	Definition
(Dig)	For metals analysis, sample was digested.
[2C]	Reported from the second channel in dual column analysis.
DA	Direct Analysis
DF	Dilution Factor
MDL	Method Detection Limit.
ND	Analyte was NOT DETECTED at or above the detection limit.
NR	Spike/Surrogate showed no recovery.
Q	Qualifier
RCS	Respirable Crystalline Silica
RL	Reporting Limit
Wet	Sample is not dry weight corrected.

Measurement of uncertainty and any applicable definitions of method modifications are available upon request. Per EPA NLLAP policy, sample results are not blank corrected.

EMSL Analytical, Inc.

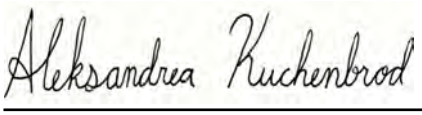
6340 Castleplace Drive, Indianapolis, IN, 46250
Telephone: 317.803.2997 Fax:317.803.3047
www.emsl.com

EMSL Order ID: 162561185
LIMS Reference ID: CD61185
EMSL Customer ID: MEDT50

Attention: Anthony Fullerton
Med-Tox Northwest [MEDT50]
PO Box 1446
Auburn, WA 98071
(253) 351-0677
fullertona@medtoxnw.com

Project Name: 9113.2A

Customer PO:
EMSL Sales Rep: Natalie Murphy
Received: 09/19/2025 10:20
Reported: 09/22/2025 08:17



Aleks Kuchenbrod Laboratory Manager or other approved signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. QC sample results are within quality control criteria and met method specifications unless otherwise noted. All results for soil samples are reported on a dry weight basis, unless otherwise noted.

Analysis following EMSL SOP for the Determination of Environmental Lead by FLAA. The laboratory has a reporting limit of 0.0064% by wt., based upon a minimum sample weight of 0.25g submitted to the lab, and is not responsible for any result or reporting limit provided in mg/cm2 since it is dependent upon an area value provided by non-lab personnel. A "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty and definitions of modifications are available upon request. Results in this report are not blank corrected unless specified.

Lead (Pb) Chain of Custody

EMSL Order ID *(Lab Use Only):*

102511185

PHONE:
FAX:

Company : Med-Tox NW	**EMSL-Bill to:** ☐ Different ☐ Same If Bill to is Different note instructions in Comments**
Street: P.O.BOX 1446	*Third Party Billing requires written authorization from third party*
City: Auburn **State/Province:** WA	**Zip/Postal Code:** 98071 **Country:** USA
Report To (Name): Anthony Fullerton	**Telephone #:** 253.351.0677
Email Address: fullertona@medtoxnw.com	**Fax #:** **Purchase Order:**
Project Name/Number: 9113.2a	**Please Provide Results:** ☐ FAX ☐ E-mail ☐ Mail
U.S. State Samples Taken: WA	**CT Samples:** ☐ Commercial/Taxable ☐ Residential/Tax Exempt

Turnaround Time (TAT) Options* - Please Check

☐ 3 Hour ☐ 6 Hour ☒ 24 Hour ☐ 48 Hour ☐ 72 Hour ☐ 96 Hour ☐ 1 Week ☐ 2 Week

**Analysis completed in accordance with EMSL's Terms and Conditions located in the Price Guide*

Matrix	Method	Instrument	Reporting Limit	Check
Chips ☒ % by wt. ☐ mg/cm² ☐ ppm	SW846-7000B	Flame Atomic Absorption	0.01%	☒
Air	NIOSH 7082	Flame Atomic Absorption	4 µg/filter	☐
	NIOSH 7105	Graphite Furnace AA	0.03 µg/filter	☐
	NIOSH 7300 modified	ICP-AES/ICP-MS	0.5 µg/filter	☐
Wipe* ASTM ☐ non ASTM ☐ *if no box is checked, non-ASTM Wipe is assumed	SW846-7000B	Flame Atomic Absorption	10 µg/wipe	☐
	SW846-6010B or C	ICP-AES	1.0 µg/wipe	☐
	SW846-7000B/7010	Graphite Furnace AA	0.075 µg/wipe	☐
TCLP	SW846-1311/7000B/SM 3111B	Flame Atomic Absorption	0.4 mg/L (ppm)	☐
	SW846-1131/SW846-6010B or C	ICP-AES	0.1 mg/L (ppm)	☐
Soil	SW846-7000B	Flame Atomic Absorption	40 mg/kg (ppm)	☐
	SW846-7010	Graphite Furnace AA	0.3 mg/kg (ppm)	☐
	SW846-6010B or C	ICP-AES	2 mg/kg (ppm)	☐
Wastewater Unpreserved ☐ Preserved with HNO_3 pH < 2 ☐	SM3111B/SW846-7000B	Flame Atomic Absorption	0.4 mg/L (ppm)	☐
	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	☐
	EPA 200.7	ICP-AES	0.020 mg/L (ppm)	☐
Drinking Water Unpreserved ☐ Preserved with HNO_3 pH < 2 ☐	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	☐
	EPA 200.8	ICP-MS	0.001 mg/L (ppm)	☐
TSP/SPM Filter	40 CFR Part 50	ICP-AES	12 µg/filter	☐
	40 CFR Part 50	Graphite Furnace AA	3.6 µg/filter	☐
Other:				☐

Name of Sampler: A Fullerton **Signature of Sampler:** A Fullerton

Sample #	Location	Volume/Area	Date/Time Sampled
9113.2a-AF-01Pb	white paint on GWB - Shipping/Recv		9/17/25
9113.2a-AF-02Pb	white paint on wood window sill		9/17/25
9113.2a-AF-03Pb	Tan/Beige paint on wood Siding		9/17/25

Client Sample #'s - **Total # of Samples:**

Relinquished (Client):		**Date:**		**Time:**	
Received (Lab):		**Date:**	9/19/25	**Time:**	10:30A

Comments: All Samples collected From Shipping and Receiving Bldg

Table 3. Summary of Bulk Paint Chip Sample Results.

Sample Number	Location	Component	Substrate	Color	Result (%wt*)
Shipping and receiving					
9113.2a-AF-01PB	Interior	Wall	GWB	White	
9113.2a-AF-02PB	Interior	Window frame and sill	Wood	White	
9113.2a-AF-03PB	Entry way	Exterior wall	Wood	Tan/beige	

%wt= percent in weight

Certificate of Completion

This is to certify that

Anthony L Fullerton

has satisfactorily completed
4 hours of online refresher training as an

AHERA Building Inspector

to comply with the training requirements of

TSCA Title II, 40 CFR 763 (AHERA)

EPA Provider # 1085

198347
Certificate Number

Instructor: Tracy Bockla

Aug 26, 2025 Expires in 1 year.
Date(s) of Training

Exam Score: N/A
(if applicable)

Terracon
Explore with us

- Facilities
- Environmental
- Geotechnical
- Materials

STATE OF WASHINGTON

Department of Commerce

Lead-Based Paint Activities Program

Anthony L Fullerton

Has fulfilled the certification requirements of WAC 365-230 and has been certified to conduct lead based paint activities as a ***Risk Assessor***.

Certification #	Issuance Date	Expiration Date
0242	06/21/2023	04/03/2026

United States Department of Commerce
National Institute of Standards and Technology

Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200768-0

Seattle Asbestos Test, LLC

Lynnwood, WA

is accredited by the National Voluntary Laboratory Accreditation Program for specific services, listed on the Scope of Accreditation, for:

Asbestos Fiber Analysis

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique on ISO/IEC 17025).

2024-10-01 through 2025-09-30

Effective Dates

For the National Voluntary Laboratory Accreditation Program

AIHA Laboratory Accreditation Programs, LLC

acknowledges that

EMSL Analytical, Inc.

6340 Castleplace Drive Indianapolis, IN 46250

Laboratory ID: LAP-157245

along with all premises from which key activities are performed, as listed above, has fulfilled the requirements of the AIHA Laboratory Accreditation Programs, LLC (AIHA LAP) accreditation to the ISO/IEC 17025:2017 international standard, General Requirements for the Competence of Testing and Calibration Laboratories in the following:

LABORATORY ACCREDITATION PROGRAMS

☑	**INDUSTRIAL HYGIENE**	Accreditation Expires: August 01, 2027
☑	**ENVIRONMENTAL LEAD**	Accreditation Expires: August 01, 2027
☑	**ENVIRONMENTAL MICROBIOLOGY**	Accreditation Expires: August 01, 2027
☐	**FOOD**	Accreditation Expires:
☐	**UNIQUE SCOPES**	Accreditation Expires:
☐	**BE FIELD/MOBILE**	Accreditation Expires:

Specific Field(s) of Testing/Method(s) within each Accreditation Program for which the above named laboratory maintains accreditation is outlined on the attached Scope of Accreditation. Continued accreditation is contingent upon successful on-going compliance with ISO/IEC 17025:2017 and AIHA LAP requirements. This certificate is not valid without the attached Scope of Accreditation. Please review the AIHA LAP website (www.aihaaccreditedlabs.org) for the most current Scope.

Cheryl O. Morton

Cheryl O Morton
Managing Director, AIHA Laboratory Accreditation Programs, LLC

Revision21: 10/24/2023

Date Issued: 08/01/2025

AIHA Laboratory Accreditation Programs, LLC

SCOPE OF ACCREDITATION

EMSL Analytical, Inc.

Laboratory ID: LAP-157245

Issue Date: 08/01/2025

6340 Castleplace Drive Indianapolis, IN 46250

Expire Date: 08/01/2027

The laboratory is approved for those specific field(s) of testing/methods listed in the table below. Clients are urged to verify the laboratory's current accreditation status for the particular field(s) of testing/Methods, since these can change due to proficiency status, suspension and/or withdrawal of accreditation.

Environmental Microbiology Laboratory Accreditation Program (EMLAP)

Initial Accreditation Date: 12/01/2004

EMLAP Scope Category	Field of Testing (FOT)	Component, parameter, characteristic, material, or product tested	Method	Method Description *(for internal methods only)*
Bacterial	Air - Culturable	Air	MICRO-SOP-132	Detection and Enumeration of Culturable Bacteria from Environmental Samples
Bacterial	Air - Culturable	Air	MICRO-SOP-160	Detection and Enumeration of Culturable Microbes from USP 797 Samples
Bacterial	Bulk - Culturable	Bulk (Liquids & Solids)	MICRO-SOP-160	Detection and Enumeration of Culturable Microbes from USP 797 Samples
Bacterial	Bulk - Culturable	Bulks (liquid or solid)	MICRO-SOP-132	Detection and Enumeration of Culturable Bacteria from Environmental Samples
Bacterial	Legionella	Water, Swabs, Soil and Air	MICRO-SOP-105	ISO 11731:2017
Bacterial	Surface - Culturable	Swab or Contact Plate	MICRO-SOP-132	Detection and Enumeration of Culturable Bacteria from Environmental Samples
Bacterial	Surface - Culturable	Swab or Contact Plate	MICRO-SOP-160	Detection and Enumeration of Culturable Microbes from USP 797 Samples
Fungal	Air - Direct Examination	Spore Trap	MICRO-SOP-201	Standard Operating Procedure for the Analysis of Airborne Fungal Spores, Hyphal Fragments, Pollen, Insect Fragments, Skin Fragments and

EMLAP Scope Category	Field of Testing (FOT)	Component, parameter, characteristic, material, or product tested	Method	Method Description *(for internal methods only)*
				Fibrous Particulate by Optical Microscopy of Spore Trap Samples
Fungal	Bulk - Direct Examination	Bulks (liquid or solid)	MICRO-SOP-200	SOP for the Microscopic Examination of Fungal Spores, Fungal Structures, Hyphae, Pollen, Insect Fragments, and Fibrous Particulate from Surface Samples
Fungal	Surface - Direct Examination	Swab or Tape Lift	MICRO-SOP-200	SOP for the Microscopic Examination of Fungal Spores, Fungal Structures, Hyphae, Pollen, Insect Fragments, and Fibrous Particulate from Surface Samples

A complete listing of currently accredited EMLAP laboratories is available on the AIHA LAP, LLC website at: *http://www.aihaaccreditedlabs.org*

Environmental Abatement Services, Inc.

Date 09/10/25 Supervisor Cathy Marquez Card # 016215A

Job Location 201 Harris Ave, Bellingham, WA Job# A25190

Notes Regarding Job

Water Available on site?	YES
Power available on site?	YES
Wage?	PW
Large Ladder?	4-6FT, EXTEN
Rental Equipment:	YES
Survey Included?	YES
Access to Building	**YES**
Scope of Work:	**Removal of 288SF of sealant from conatinaer shed. Remove and recycle 39 ballast & 46 light tubes froum building. Contractor will supply manlift.**
	0
	0
Entry To Property:	**YES**
	Whatcom
Materials disposed	Sealant, ballast & tubes
Job Site Contact:	Jeremy Cox / 360-303-2787
Exact Location	Container Shed - through out building

CALL OFFICE WHEN ON JOB EARLIER THAN 8:00
AM - or - OFF JOB EARLIER
THEN 4:30 PM (or later than 4:30 PM)!!

Environmental Abatement Services, Inc.

Date 10/17/25 Supervisor Cathy Marquez Card # 016215A

Job Location 201 Harris Ave, Bellingham, WA Job# A25190

Notes Regarding Job

Water Available on site?	YES
Power available on site?	YES
Wage?	PW
Large Ladder?	4-6FT, EXTEN
Rental Equipment:	NO
Survey Included?	YES
Access to Building	**YES**
Scope of Work:	**Removal of 20LF of AC pipe**
	0
	0
Entry To Property:	**YES**
	Whatcom
Materials disposed	Sealant, ballast & tubes
Job Site Contact:	Jeremy Cox / 360-303-2787
Exact Location	Container Shed

Steel toes
Hard Hat
Safety vest

CALL OFFICE WHEN ON JOB EARLIER THAN 8:00 AM - or - OFF JOB EARLIER THEN 4:30 PM (or later than 4:30 PM)!!

Environmental Abatement Services, Inc.

Date 10/30/25 Supervisor Cathy Marquez Card # 016215A

Job Location 201 Harris Ave, Bellingham, WA Job# A25190

Notes Regarding Job

Water Available on site?	YES
Power available on site?	YES
Wage?	PW
Large Ladder?	4-6FT, EXTEN
Rental Equipment:	YES
Survey Included?	YES
Access to Building	YES
Scope of Work:	Removal of 288SF of silver coat from containaer shed.
	Supervise 2 concrete walls
	0
	0
Entry To Property:	YES
	Whatcom
Materials disposed	silver coat, concrete
Job Site Contact:	Jeremy Cox / 360-303-2787
Exact Location	Container Shed

CALL OFFICE WHEN ON JOB EARLIER THAN 8:00 AM - or - OFF JOB EARLIER THEN 4:30 PM (or later than 4:30 PM)!!

SEATTLE ASBESTOS TEST

LYNNWOOD LAB: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel:425.673.9850, Fax:435.673.9810

BELLEVUE LAB: 12727 Northup Way, Suite 1, Bellevue, WA 98005, Tel:425.861.1111, Fax:425.861.1116

ASBESTOS & OTHER FIBER ANALYSIS BY NIOSH 7400 (PCM)

Attention: Cathy Marquez
Client: Environmental Abatement Services, Inc.
Address: P. O. Box 2503,Mount Vernon,WA 98273

Batch #: 202510799
Job#: A25190
Samples: 2

Project Location: 201 Harris Ave, Bellingham, WA

1	Sample ID	AM103125-01	Location	Inside cabin on machine								LOQ (MIN)	0.053
	Type	TWA	Activities	Demo concrete building with less <1% ACM								LOQ (MAX)	0.686
	Protection	M	Observation									RL (Fb/cc)	0.004
	Decon		Worker	Brandon	SSN		Cert #					Fb/Fields	19
	Environment	Hepa	StartTime	08:02	End Time	14:07			Min.	365		Fb/mm2	24.20
	Pump #		StartRate	2	End Rate	2	Ave. Rate	2	Liters	730		Fb/cc	0.013
	Date	10/31/2025											
2	Sample ID	AM103125-02	Location	Inside Reg Area								LOQ (MIN)	0.053
	Type	TWA	Activities	Spraying water								LOQ (MAX)	0.693
	Protection	M	Observation									RL (Fb/cc)	0.004
	Decon		Worker	Alfonso Mazcorro	SSN		Cert #					Fb/Fields	17
	Environment	Hepa	StartTime	08:03	End Time	14:04			Min.	361		Fb/mm2	21.66
	Pump #		StartRate	2	End Rate	2	Ave. Rate	2	Liters	722		Fb/cc	0.012
	Date	10/31/2025											

Blank Ave. (f/mm2): 0.0 Microscope View Area (mm2):0.00785 Effective Filtration Area (mm2):385 Precision:16%+/- Accuracy:10%+/-

LOQ: Limits of Quantification; RL: the Reporting Limit

Sampled by: Environmental Abatement Services, Inc.
Analyzed by: Xingping Lin
Reviewed by: Steve (Fanyao) Zhang - President

Date: 11/3/2025
Date: 11/3/2025

SEATTLE ASBESTOS TEST

LYNNWOOD LAB: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel:425.673.9850, Fax:435.673.9810

BELLEVUE LAB: 12727 Northup Way, Suite 1, Bellevue, WA 98005, Tel:425.861.1111, Fax:425.861.1118

ASBESTOS & OTHER FIBER ANALYSIS BY NIOSH 7400 (PCM)

Attention: Cathy Marquez
Client: Environmental Abatement Services, Inc.
Address: P. O. Box 2503,Mount Vernon,WA 98273

Batch #: 202510748
Job#: A25190
Samples: 2

Project Location: 201 Harris Ave, Bellingham, WA

1	Sample ID	RS101725	Location	Outside								LOQ (MIN)		0.642
	Type	B	Activities	Remove pipes								LOQ (MAX)		8.342
	Protection	M	Observation									RL (Fb/cc)		0.045
	Decon		Worker	Brandon	SSN				Cert #			Fb/Fields		2
	Environment	N										Fb/mm2	<	7.00
	Pump #		StartTime	07:45	End Time	08:15			Min.	30		Fb/cc	<	0.045
	Date	10/17/2025	StartRate	2	End Rate	2	Ave. Rate	2	Liters	60				
2	Sample ID	RS101725	Location	Outside								LOQ (MIN)		0.120
	Type	TWA	Activities	Remove pipes								LOQ (MAX)		1.554
	Protection	M	Observation									RL (Fb/cc)		0.008
	Decon		Worker	Brandon	SSN				Cert #			Fb/Fields		5
	Environment	N										Fb/mm2	<	7.00
	Pump #		StartTime	08:15	End Time	10:56			Min.	161		Fb/cc	<	0.008
	Date	10/17/2025	StartRate	2	End Rate	2	Ave. Rate	2	Liters	322				

Blank Ave. (f/mm2): 0.0 Microscope View Area (mm2):0.00785 Effective Filtration Area (mm2):385 Precision:16%+/- Accuracy:10%+/-

LOQ: Limits of Quantification; RL: the Reporting Limit

Sampled by: Environmental Abatement Services, Inc.
Analyzed by: Xingping Lin
Reviewed by: Steve (Fanyao) Zhang - President

Date: 10/23/2025
Date: 10/23/2025

SEATTLE ASBESTOS TEST LYNNWOOD LAB: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel:425.673.9850, Fax:435.673.9610 BELLEVUE LAB: 12727 Northup Way, Suite 1, Bellevue, WA 98005, Tel:425.861.1111, Fax:425.861.1116

ASBESTOS & OTHER FIBER ANALYSIS BY NIOSH 7400 (PCM)

Attention: Cathy Marquez
Client: Environmental Abatement Services, Inc.
Address: P. O. Box 2503,Mount Vernon,WA 98273

Batch #: 202510798
Job#: A25190
Samples: 2

Project Location: 201 Harris Ave, Bellingham, WA

1	Sample ID	AM103025-01	Location	Inside Reg Area									
	Type	B	Activities	Cutting metal & cleaning							LOQ (MIN)	0.642	
	Protection	M	Observation								LOQ (MAX)	8.342	
	Decon		Worker	Eduardo Sontiago	SSN			Cert #			RL (Fb/cc)	0.045	
	Environment	Hepa									Fb/Fields	3	
	Pump #		StartTime	07:43	End Time	08:13			Min.	30	Fb/mm2	<	7.00
	Date	10/30/2025	StartRate	2	End Rate	2	Ave. Rate	2	Liters	60	Fb/cc	<	0.045
2	Sample ID	AM103025-02	Location	Inside Reg Area									
	Type	TWA	Activities	Cleaning silver paint							LOQ (MIN)	0.057	
	Protection	M	Observation								LOQ (MAX)	0.738	
	Decon		Worker	Eduardo Sontiago	SSN			Cert #			RL (Fb/cc)	0.004	
	Environment	Hepa									Fb/Fields	15	
	Pump #		StartTime	08:13	End Time	13:52			Min.	339	Fb/mm2	19.11	
	Date	10/30/2025	StartRate	2	End Rate	2	Ave. Rate	2	Liters	678	Fb/cc	0.011	

Blank Ave. (f/mm2): 0.0 Microscope View Area (mm2):0.00785 Effective Filtration Area (mm2):385 Precision:16%+/- Accuracy:10%+/-

LOQ: Limits of Quantification; RL: the Reporting Limit

Sampled by: Environmental Abatement Services, Inc.
Analyzed by: Xingping Lin Date: 11/3/2025
Reviewed by: Steve (Fanyao) Zhang - President Date: 11/3/2025

ASN 4 ASBESTOS WASTE SHIPMENT REPORT FORM

PLEASE PRINT OR TYPE! If you have any questions, contact your local DEQ Regional Office in Portland at 503-229-5364, Salem at 503-378-8140 ext. 272, Medford at 541-776-6010 ext. 235, or Bend at 541-388-6146 ext. 226. OR call 800-452-4011 for the location of your local regional DEQ office.

Trailer

WASTE GENERATOR: 0 Commercial ☒ Residential ☐ Job # **A25190**

Asbestos removal site name and address: **201 Harris Ave, Bellingham, WA**

Port of Bellingham Whatcom

Street/City/State/ZIP/County

Contact person/phone: **Jeremy Cox / 360-303-2787**

2. Operator's name and address: **Environmental Abatement Services, Inc.** Phone: **360-755-1085**

PO Box 2503 / 18365 W. Lincoln	**Mount Vernon, WA**	**Skagit**	**98273**
Street	City/State	County	Zip

3. Waste disposal site: **Wasco County Landfill** Phone: **541-296-4082**

2550 Steele Road	**The Dalles, OR**	**Wasco**	**97058**
Street	City/State	County	Zip

4 Describe asbestos materials: **Sealant, ballast & tubes**

5. Containers: Number: 2 bags Type: **6 Mil Doubled**

6 Total quantity (cubic yards): 0.82 Yards

7 **OPERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and Accurately described above by proper shipping name and are classified, packaged, and labeled, and are in all repects in proper condition for transport according to all government regualtions. All movement of this asbestos-containing material is recorded on this Waste Shipment Record Form.

Name: Catherine Marquez Company: Environmental Abatement Services, Inc.

Signature: _____ Date: 10/17/25

TRANSPORTER(S):

8 Transporter #1: (Acknowledgement of receipt of materials)

Agent: Audrey Zhuk / Allstate Transport Inc. Company: **Allstate Transporting**

Address: ~~1905 Lincoln Ave, Tacoma, WA 98421~~ Puyallup, WA 98421 Phone: **253-383-3826**

Signature: _____ Date: 10.23.25

9 Transporter #2: (Acknowledgement of receipt of materials)

Agent: _____ Company: _____

Address: _____ Phone: _____

Signature: _____ Date: _____

Disposal: (Certification of receipt of asbestos materials covered by this manifest, except as noted in item 11 below.)

Waste Disposal; Site: WASCO COUNTY LANDFILL

Name and Title: Ashley Dill Date: NOV 0 3 2025

Signature: _____ Phone: 541-296-4082

DISCREPANCY SPACE: (Add attachments as needed)

ASN 4 ASBESTOS WASTE SHIPMENT REPORT FORM

PLEASE PRINT OR TYPE! If you have any questions, contact your local DEQ Regional Office in Portland at 503-229-5364, Salem at 503-378-8140 ext. 272, Medford at 541-776-6010 ext. 235, or Bend at 541-388-6146 ext. 226. OR call 800-452-4011 for the location of your local regional DEQ office.

WASTE GENERATOR: 0 Storage building ~~House~~ Comemercial ☒ Residential ☒ Job # **A25190**

Asbestos removal site name and address: **201 Harris Ave, Bellingham, WA**

Port of Bellingham

Street/City/State/ZIP/County

Contact person/phone: **Jeremy Cox / 360-303-2787**

2. Operator's name and address: **Environmental Abatement Services, Inc.** Phone: **360-755-1085**

PO Box 2503 / 18365 W. Lincoln	**Mount Vernon, WA**	**Skagit**	**98273**
Street	City/State	County	Zip

3. Waste disposal site: **Wasco County Landfill** Phone: **541-296-4082**

2550 Steele Road	**The Dalles, OR**	**Wasco**	**97058**
Street	City/State	County	Zip

4 Describe asbestos materials: **Sealant, ballast & tubes**

5. Containers: Number: 3 bags Type: **6 Mil Doubled**

6 Total quantity (cubic yards): _____

7 **OPERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and Accurately described above by proper shipping name and are classified, packaged, and labeled, and are in all repects in proper condition for transport according to all government regualtions. All movement of this asbestos-containing material is recorded on this Waste Shipment Record Form.

Name: Catherine Marquez Company: Environmental Abatement Services, Inc.

Signature: Roberto Date: 9.10.2025

TRANSPORTER(S):

8 Transporter #1: (Acknowledgement of receipt of materials)

Agent: Audrey Zhuk / Allstate Transport Inc. Company: **Allstate Transporting**

Address: ~~19051 E Lincoln Ave, Tacoma, WA 98421~~ 19051 E Lincoln Ave., Tacoma, WA 98421 Phone: **253-383-3826**

Signature: _____ Date: 9.29.25

9 Transporter #2: (Acknowledgement of receipt of materials)

Agent: _____ Company: _____

Address: _____ Phone: _____

Signature: _____ Date: _____

Disposal: (Certification of receipt of asbestos materials covered by this manifest, except as noted in item 11 below.)

Waste Disposal; Site: WASCO COUNTY LANDFILL

Name and Title: Sabrina Johnson Date: ~~OCT 1 3 2025~~

Signature: _____ Phone: ~~541-296-4082~~

DISCREPANCY SPACE: (Add attachments as needed) _____

ASN 4 ASBESTOS WASTE SHIPMENT REPORT FORM

PLEASE PRINT OR TYPE! If you have any questions, contact your local DEQ Regional Office in Portland at 503-229-5364, Salem at 503-378-8140 ext. 272, Medford at 541-776-6010 ext. 235, or Bend at 541-388-6146 ext. 226. OR call 800-452-4011 for the location of your local regional DEQ office.

House

WASTE GENERATOR: 0 Comemercial ☐ Residential ☒ Job # **A25190**

Asbestos removal site name and address: **201 Harris Ave, Bellingham, WA** 98225

Port of Bellingham Whatcom

Street/City/State/ZIP/County

Contact person/phone: **Jeremy Cox / 360-303-2787**

2. Operator's name and address: **Environmental Abatement Services, Inc.** Phone: **360-755-1085**

PO Box 2503 / 18365 W. Lincoln	**Mount Vernon, WA**	**Skagit**	**98273**
Street	City/State	County	Zip

3. Waste disposal site: **Wasco County Landfill** Phone: **541-296-4082**

2550 Steele Road	**The Dalles, OR**	**Wasco**	**97058**
Street	City/State	County	Zip

4 Describe asbestos materials: **silver coat, concrete**

5. Containers: Number: 13 bags Type: **6 Mil Doubled**

6 Total quantity (cubic yards): 0.7 yards

7 **OPERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and Accurately described above by proper shipping name and are classified, packaged, and labeled, and are in all repects in proper condition for transport according to all government regualtions. All movement of this asbestos-containing material is recorded on this Waste Shipment Record Form.

Name: Catherine Marquez Company: Environmental Abatement Services, Inc.

Signature: Catherine Marquez Date: 10-31-2025

TRANSPORTER(S):

8 Transporter #1: (Acknowledgement of receipt of materials)

Agent: Audrey Zhuk / Allstate Transport Inc. Company: **Allstate Transporting**

Address: ~~1905 E lincoln Ave, Tacoma, WA 98421~~ 1905 Lincoln Ave., Tacoma, WA 98421 Phone: **253-383-3826**

Signature: Date: 11-25-25

9 Transporter #2: (Acknowledgement of receipt of materials)

Agent: Company:

Address: Phone:

Signature: Date:

Disposal: (Certification of receipt of asbestos materials covered by this manifest, except as noted in item 11 below.)

Waste Disposal; Site: WASCO COUNTY LANDFILL

Name and Title: Ashley Dill Date: DEC 0 3 2025

Signature: Phone: 541-296-4082

DISCREPANCY SPACE:(Add attachments as needed)

APPENDIX E

Waste Disposal Manifests

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
VSQG	2	(800)337-7455	027705294 JJK

GENERATOR

5. Generator's Name and Mailing Address
Port of Bellingham-Harris Ave Shipyard
1801 Roeder Ave
Bellingham WA 98225
Generator's Phone: 360 676-2500
Attn: Alice Cords

Generator's Site Address (if different than mailing address)
Port of Bellingham
201 Harris Ave
Bellingham WA 98225

6. Transporter 1 Company Name
DH Environmental Inc.
U.S. EPA ID Number
WAH000047217

7. Transporter 2 Company Name
Chemical Waste Management
U.S. EPA ID Number
ORD089452353

8. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT, INC
17629 CEDAR SPRINGS LANE
ARLINGTON OR 97812
Facility's Phone: 541 454-2643
U.S. EPA ID Number
ORD089452353

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN1263, Paint Related Material, 3, PGIII	01	DM	150	P	NONE
X	2. UN2735, Amines, liquid, corrosive, n.o.s., (Benzyl Alcohol, Ethanolamine), 8, PGIII	01	DF	10	P	NONE
	3. Non-RCRA, non-DOT (Grease OR365988)	01	DM	50	P	NONE
	4. Non-RCRA, non-DOT (Glass Flakes OR365985)	02	DF	10	P	NONE

14. Special Handling Instructions and Additional Information
1) Profile# OR365976 Site is VSQG would otherwise designate as D001, D035 ERG#128 2) Profile# OR365987 Site is VSQG would otherwise designate as D002. ERG#153 3) Profile# OR365988 4) Profile# OR365985

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Matthew Vander Ark on behalf of Port of Bellingham
Signature:
Month: 12 Day: 18 Year: 25

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Jacob Briere
Signature:
Month: 12 Day: 18 Year: 25

Transporter 2 Printed/Typed Name: Alvaro Ubilla
Signature:
Month: 12 Day: 19 Year: 25

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name:
Signature:
Month: Day: Year:

TRANSPORTER COPY

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number: VSQG

22. Page: 2 of 2

23. Manifest Tracking Number: 027705294JJK

24. Generator's Name: Port of Bellingham-Harris Ave Shipyard

25. Transporter _____ Company Name: <none> U.S. EPA ID Number:

26. Transporter _____ Company Name U.S. EPA ID Number:

GENERATOR

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
	(5) Non-RCRA, non-DOT (Silica Gel OR365986)	01	PM	300	P	NONE
	(6) Non-RCRA, non-DOT (Baypure DS100 OR366012)	02	DF	600	P	NONE
	(7) Non-RCRA, non-DOT (Oily Debris OR366016)	01	DM	150	P	NONE

32. Special Handling Instructions and Additional Information: (5) Profile# OR365986 (6) Profile OR366012 (7) Profile OR366016

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials

Printed/Typed Name Signature Month Day Year

34. Transporter _____ Acknowledgment of Receipt of Materials

Printed/Typed Name Signature Month Day Year

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

THIS MEMORANDUM

is an acknowledgement that a bill of lading has been issued and is not the Original Bill of Lading, not a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No. VSQG

Carrier DH Environmental SCAC Carrier's No. WA1100047317 Date 12/10/15

TO:	FROM:
Consignee Chemical Waste Management	
Street 17629 Cedar Springs Ln N	
Destination Arlington OR Zip 97812	Origin Bellingham WA 98225 Zip

Route | Vehicle Number 10811 | U.S. DOT Hazmat Reg. No.

Number and Type of Packages	HM	I.D. Number	Description of Articles	Hazard Class	Pkg. Grp.	Total Quantity (mass, volume, or activity)	Weight (subject to correction)	Class or Rate
1 - Roll off			Waste Gasoline, ignitable UN 1203, 3, PG II	D001			470	110

Remit COD to:
Address:
City: State: Zip:

NOTE: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ Per

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

COD AMT: $

TOTAL CHARGES: $

COD FEE: Prepaid ☐ Collect ☐ $

FREIGHT CHARGES: ☐ Prepaid ☐ Collect

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request; and all applicable state and federal regulations; the Property described above, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to delivery at said destination, if on its route, or otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said Property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said Property that every service to be performed hereunder shall be subject to all the conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

NOTE: Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. 14706(c)(1)(A) and (B).

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. Per

PLACARDS REQUIRED NO

PLACARDS SUPPLIED ☐ BY SHIPPER ☐ BY CARRIER

DRIVER'S SIGNATURE:

SHIPPER: PER: DATE:

CARRIER: DH Environmental PER: DATE: 12/10/15

EMERGENCY RESPONSE TELEPHONE NUMBER:

NAME OR CONTRACT NUMBER OR OTHER UNIQUE IDENTIFIER:

209-BLC-Q 3 12461 (Rev. 9/10)

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number
NoneRequired	1	(800) 337-7455	POB-DW-120825

GENERATOR

5. Generator's Name and Mailing Address
Port of Bellingham-Harris Ave Shipyard
1801 Roeder Ave
Bellingham, WA 98225
360.676.2500 Attn: Alice Cordo

Generator's Site Address (if different than mailing address)
Port of Bellingham-Harris Ave Shipyard
201 Harris Ave
Bellingham, WA 98225

Generator's Phone:

6. Transporter 1 Company Name
DH Environmental, Inc.

U.S. EPA ID Number
WAH000047217

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address
Services
1516 S Graham St
Seattle, WA 98108
206.762.0240

U.S. EPA ID Number
WAD980974521

Facility's Phone:

	9. Waste Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
1.	Non-RCRA, non-DOT (Oily Water)	01	TT	2700	G	
2.						
3.						
4.						

13. Special Handling Instructions and Additional Information
1) Profile# DH Oily Water

14. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name	Signature	Month	Day	Year
Matthew Vander Ave on behalf of Port of Bellingham	MVde	12	08	25

INT'L

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:

Transporter Signature (for exports only): Date leaving U.S.:

TRANSPORTER

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name	Signature	Month	Day	Year
A Lastang		12	8	25
Transporter 2 Printed/Typed Name	Signature	Month	Day	Year

DESIGNATED FACILITY

17. Discrepancy

17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator)	Month	Day	Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name	Signature	Month	Day	Year
DKS: Troy V.		12	9	25

TRANSPORTER #1

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number
None Required	1	(800) 424-9300 (Chemtrec)	POB-SOIL-010725

GENERATOR

5. Generator's Name and Mailing Address

Port of Bellingham Harris Shipyard
301 Harris Ave
Bellingham, WA 98226
360.676.2500 Attn: Alex Gerla

Generator's Site Address (if different than mailing address)

301 Harris Ave
Bellingham, WA 98226

Generator's Phone:

6. Transporter 1 Company Name: DH Environmental, Inc. — U.S. EPA ID Number: WAH000047217

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address

Manke
5400 W Marginal Way SW
Seattle, WA 98106
(206) 933-5618

U.S. EPA ID Number: N/A

Facility's Phone:

	9. Waste Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
1.	Material Not Regulated by DOT (non-regulated soil/sediment)	2	DM	2	T	
2.						
3.						
4.						

13. Special Handling Instructions and Additional Information

4 DH-STRUER-HARRIS SOIL

14. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name — Signature — Month — Day — Year

INT'L

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:

Transporter Signature (for exports only): Date leaving U.S.:

TRANSPORTER

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name — Signature — Month — Day — Year

Transporter 2 Printed/Typed Name — Signature — Month — Day — Year

DESIGNATED FACILITY

17. Discrepancy

17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator) — Month — Day — Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name — Signature — Month — Day — Year

GENERATOR'S/SHIPPER'S INITIAL COPY

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

December 10, 2025

Nathan Kruse
DH Environmental, Inc.
1011 SW Klickitat Way, Suite 107
Seattle, WA 98103

Re: Analytical Data for Project J-1389
Laboratory Reference No. 2511-265B

Dear Nathan:

Enclosed are the analytical results and associated quality control data for samples submitted on November 25, 2025.

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

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

Sincerely,

David Baumeister
Project Manager

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

Rainier ENVIRONMENTAL

Dangerous Waste Characterization

Sample ID: OWS #1; OWS #3

Report date: December 10, 2025

Submitted to:

OnSite Environmental
14648 NE 95th Street
Redmond, WA 98052

Rainier Environmental
5013 Pacific Hwy East
Suite 20
Tacoma, WA 98424

1.0 INTRODUCTION

A dangerous waste characterization using the test organism *Oncorhynchus mykiss* (rainbow trout) was conducted on two samples submitted by Onsite Environmental to Rainier Environmental. Testing was conducted following the Washington State Department of Ecology Publication 80-12.

2.0 METHODS

The samples, identified as OWS #1 and OWS #3 were received in the laboratory on December 5, 2025. Upon arrival at the laboratory the samples were inspected and contents verified against information provided on the chain-of-custody form. The samples were stored at 4°C in the dark until use. The test procedure is outlined in Table 1.

Table 1. Summary of Dangerous Waste Characterization Test Conditions

Parameter	Standard Fish Toxicity Test
Test numbers	2512-010; 2512-011
Sample ID's	OWS #1; OWS #3
Test initiation date; time	12/6/2025; 0830h
Test termination date; time	12/10/2025; 0830h
Endpoint	Mortality at 96-hours
Test chamber	7.5 L Plastic tank
Test temperature	12 ± 1°C
Dilution water	Moderately hard synthetic water
Test solution volume	6 L
Test concentrations (mg/L)	100, 10, 0
Number of organisms/chamber	10
Number of replicates	3
Test organism	*Oncorhynchus mykiss* (rainbow trout)
Feeding	No feeding during test
Photoperiod	16 hours light/ 8 hours dark
Extraction	Rotary agitation (30 +/- 2 rpm) for 18 hours
Reference Toxicant	Copper sulfate
Deviations	None

The test organisms used in the test are outlined in Table 2. The samples were tested using fish received on December 2, 2025.

Table 2. Test organisms (*Oncorhynchus mykiss*)

Test organism age	20 days post swim-up (hatch date 11/2/2025)
Mean weight	0.31 g
Mean length	31 mm
Ratio of longest to shortest	1.2
Loading	0.52 g/L
Test organism source	Thomas Fish; Anderson, CA

3.0 RESULTS

A summary of results for the dangerous waste characterization conducted on samples OWS #1 and OWS #3 are contained in Table 3. There was no mortality during the tests. Based on these results, the samples do not designate as either a dangerous or extremely hazardous waste. Copies of the laboratory bench sheets, statistical summaries of reference toxicant tests, and chain-of-custody form are provided in Appendices A through C.

Table 3. Summary of Results

Sample ID	Concentration (mg/L)	Survival (# fish, N=30)	Percent Mortality	Dangerous Waste Designation
Control	0	30	0	NA
OWS #1	10	30	0	None
	100	30	0	
OWS #3	10	30	0	None
	100	30	0	

4.0 QUALITY ASSURANCE

The most recently completed reference toxicant test was initiated November 26, 2025. The LC_{50} of 123 µg/L copper fell within the acceptable range of mean ± two standard deviations of historical test results indicating that the test organisms were of an appropriate degree of sensitivity. The coefficient of variation (CV) for the last 20 tests was 28.1 percent, which is considered excellent by the Biomonitoring Science Advisory Board.

5.0 REFERENCES

WDOE. 2016. Laboratory Guidance and Whole Effluent Toxicity Test Review Criteria. Washington State Department of Ecology. Water Quality Program. Publication number: WQ-R-95-80, Revised June 2016.

WDOE. 2020. Biological Testing Methods 80-12 for the Designation of Dangerous Waste. Washington State Department of Ecology. Hazardous Waste and Toxics Reduction Program. Publication number: 80-12, Revised June 2020.

Appendix A

Oncorhynchus mykiss Dangerous Waste Toxicity Test

Raw Bench Sheets

Dangerous Waste Toxicity Test

Client: ONSITE ENVIRONMENTAL
Sample ID: OWS#1; OWS #3
Test #: 2512-010; 2512-011
Log In #: T25-669; T25-670

Start Date & Time: 12/6/2025 0830
End Date & Time: 12/10/2025 0830
Test Organism: *Oncorhynchus mykiss*
Test Protocol: **Washington State Department of Ecology Publ. 80-12**

Rep	Conc.	Cont #	Number of Live Organisms 0	24	48	72	96	Dissolved Oxygen (mg/L) 0	24	48	72	96	pH (units) 0	24	48	72	96	Conductivity (umhos/cm) 0	24	48	72	96	Temperature (°C) 0	24	48	72	96	Percent Survival
1	CON	17	10	10	10	10	10	8.9	8.5	8.3	8.1	7.8	8.08	7.87	7.69	7.42	7.21	311				319	11.8	11.7	12.1	11.8	12.1	
2		25	10	10	10	10	10	8.9	8.3	8.1	7.8	7.5	8.05	7.91	7.59	7.45	7.18	310				317						
3		7	10	10	10	10	10	9.0	8.7	8.4	8.3	8.0	8.04	7.91	7.61	7.41	7.24	316				316						
1	10PPM	27	10	10	10	10	10	8.7	8.3	8.0	7.7	7.5	8.03	7.85	7.66	7.43	7.24	308				314	11.8	11.8	12.0	12.0	11.9	
2	OWS#1	5	10	10	10	10	10	9.1	8.7	8.4	8.3	7.9	8.05	7.84	7.63	7.39	7.21	308				319						
3	T25-669	20	10	10	10	10	10	9.1	8.5	8.4	8.1	8.0	8.04	7.88	7.59	7.42	7.21	309				317						
1	100PPM	9	10	10	10	10	10	9.0	8.5	8.3	8.1	7.7	8.04	7.90	7.64	7.41	7.18	310				311	11.8	11.7	12.1	11.8	11.9	
2	OWS#1	4	10	10	10	10	10	8.8	8.4	8.2	8.0	7.6	8.07	7.91	7.60	7.41	7.20	311				316						
3	T25-669	14	10	10	10	10	10	8.7	8.3	8.1	7.8	7.5	8.11	7.87	7.54	7.39	7.24	310				319						
1	10PPM	22	10	10	10	10	10	9.1	8.7	8.6	8.4	8.2	8.08	7.85	7.62	7.44	7.19	311				317	11.8	11.7	12.1	11.9	12.0	
2	OWS #3	10	10	10	10	10	10	9.0	8.4	8.2	8.2	7.8	8.05	7.85	7.66	7.45	7.22	312				320						
3	T25-670	1	10	10	10	10	10	9.0	8.5	8.1	7.9	7.6	8.11	7.87	7.61	7.42	7.17	308				322						
1	100PPM	24	10	10	10	10	10	9.0	8.5	8.4	8.3	7.7	8.07	7.91	7.60	7.40	7.16	310				321	11.8	11.7	12.0	11.9	12.1	
2	OWS #3	15	10	10	10	10	10	8.9	8.4	8.2	8.0	7.7	8.04	7.90	7.61	7.43	7.24	310				319						
3	T25-670	11	10	10	10	10	10	8.9	8.5	8.0	7.8	7.5	8.07	7.87	7.63	7.41	7.20	312				316						
1																												
2																												
3																												
1																												
2																												
3																												
Technician Initials			JH	JH	DH	JH	DH	JH	JH	DH	JH	DH																

Sample	Alk. (init.)	Hard. (init.)	Alk. (fin.)	Hard. (fin.)	Chlorine
	(mg/L as CaCO3)				(mg/L Cl2)
Control	64	84	64	84	<0.03
OWS#1	64	84	64	84	
OWS#3	64	84	64	84	

Animal Source: Thomas Fish Co.
Date Received: 12/2/2025

Test Volume: 6.0L
Date of Hatch: 11/2/2025
Date of Swim up: 11/16/2025

Weights (g): .31 .28 .32 .31 .30 .31 .34 .32 .30 .31 μ = .31 Rainier Environmental
Lengths(mm): 30 28 34 31 30 30 31 31 32 30 μ = 31 Washington Laboratory
Length max/min: 34/28 1.2 Loading: 0.52 g/L

5013 Pacific HWY E Suite 20
Tacoma, WA 98424

Dilution Water Source: MHSW 16C QA Check JH

Appendix B

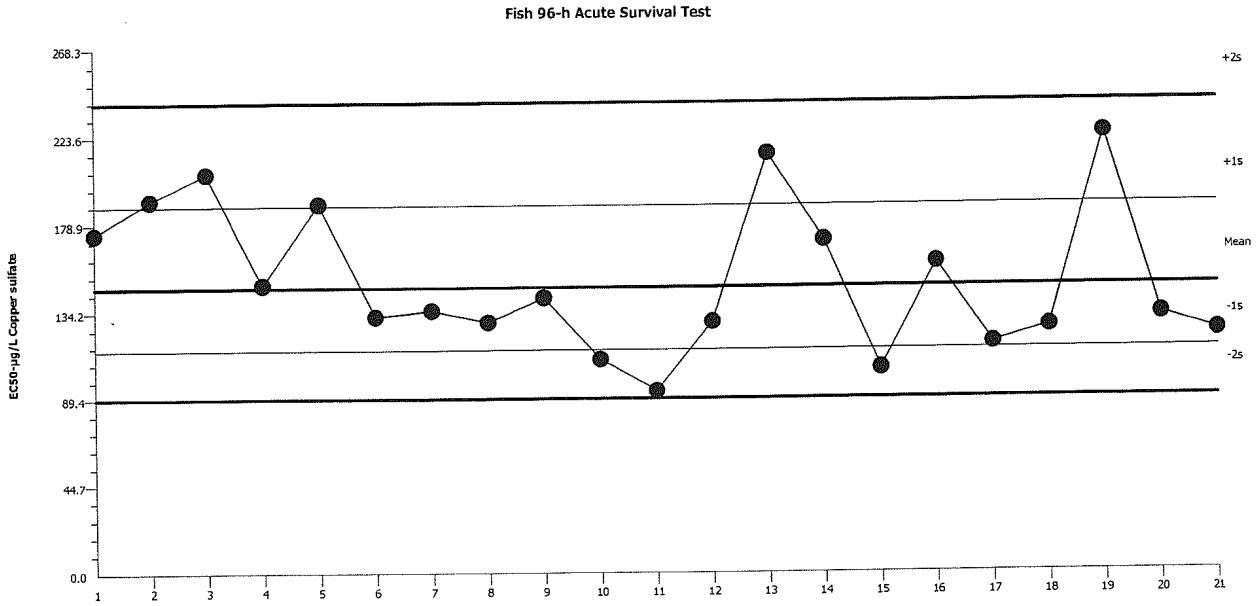
Reference Toxicant Test

Control Chart and Statistical Summary

CETIS QC Plot

Fish 96-h Acute Survival Test — **Rainier Environmental Laboratory**

Test Type:	Survival (96h)	**Organism:**	Oncorhynchus mykiss (Rainbow Tro	**Material:**	Copper sulfate
Protocol:	Not Applicable	**Endpoint:**	96h Survival Rate	**Source:**	Reference Toxicant-REF



Mean:	146.8	**Count:**	20	**-1s Warning Limit:**	114.6	**-2s Action Limit:**	89.42
Sigma:	NA	**CV:**	28.10%	**+1s Warning Limit:**	188.1	**+2s Action Limit:**	241

Quality Control Data

Point	Year	Month	Day	QC Data	Delta	Sigma	Warning	Action	Test ID	Analysis ID
1	2024	Mar	19	174.1	27.32	0.6888			17-8944-3511	21-3767-5567
2		Apr	22	191	44.18	1.062	(+)		12-5083-4514	21-2334-3383
3		May	21	204.7	57.89	1.341	(+)		04-9930-3905	05-6960-4894
4		Jun	21	148.1	1.32	0.03613			07-9850-8633	03-3750-8073
5		Jul	22	189.1	42.27	1.021	(+)		21-2874-5567	15-1487-5792
6		Aug	23	132	-14.84	-0.4301			20-3091-7165	05-6925-0005
7		Sep	23	135	-11.75	-0.3368			07-7395-1160	10-3061-0294
8		Oct	23	128.9	-17.85	-0.5233			18-6784-6821	00-0938-5502
9		Nov	22	141.4	-5.368	-0.1503			00-9890-5311	13-4181-7309
10		Dec	23	109.7	-37.11	-1.176	(-)		16-3405-7546	02-0817-2446
11	2025	Jan	24	93.3	-53.49	-1.829	(-)		16-1287-2973	13-6823-2428
12		Feb	24	128.9	-17.85	-0.5233			14-8585-1609	03-8199-2861
13		Mar	24	214.4	67.57	1.528	(+)		20-6977-8950	00-1612-4623
14		Apr	24	170.1	23.34	0.5956			07-2225-2298	03-1260-8123
15		May	22	104.7	-42.06	-1.362	(-)		10-2575-3774	11-5919-9173
16		Jun	23	158.7	11.95	0.3159			04-3834-0690	10-1484-4226
17		Jul	23	117.6	-29.23	-0.8963			01-2104-5309	06-2383-4762
18		Aug	25	126	-20.8	-0.6165			10-7146-0598	20-9455-6065
19		Sep	23	224.5	77.7	1.714	(+)		16-1525-2826	14-7249-2891
20		Oct	24	132	-14.84	-0.4301			20-1406-4047	20-9367-6610
21		Nov	26	123.1	-23.68	-0.7098			05-0649-7363	03-0586-8081

CETIS Summary Report

Test Code: RA112625OM | 05-0649-7363

Fish 96-h Acute Survival Test — **Rainier Environmental Laboratory**

Batch ID:	05-3766-0939	**Test Type:**	Survival (96h)	**Analyst:**	Eric Tollefson
Start Date:	26 Nov-25 08:30	**Protocol:**	Not Applicable	**Diluent:**	Mod-Hard Synthetic Water
Ending Date:	30 Nov-25 08:30	**Species:**	Oncorhynchus mykiss	**Brine:**	
Duration:	96h	**Source:**	Trout Lodge Fish Farm	**Age:**	64d
Sample ID:	20-6331-2474	**Code:**	RA112625OM	**Client:**	Internal Lab
Sample Date:	26 Nov-25	**Material:**	Copper sulfate	**Project:**	
Receive Date:	26 Nov-25	**Source:**	Reference Toxicant		
Sample Age:	8h	**Station:**	In House		

Comparison Summary

Analysis ID	Endpoint	NOEL	LOEL	TOEL	PMSD	TU	Method
03-0633-8465	96h Survival Rate	50	100	70.71	7.97%		Dunnett Multiple Comparison Test

Point Estimate Summary

Analysis ID	Endpoint	Level	µg/L	95% LCL	95% UCL	TU	Method
03-0586-8081	96h Survival Rate	LC50	123.1	111.3	136.2		Spearman-Kärber

96h Survival Rate Summary

C-µg/L	Control Type	Count	Mean	95% LCL	95% UCL	Min	Max	Std Err	Std Dev	CV%	%Effect
0	Dilution Water	3	1	1	1	1	1	0	0	0.0%	0.0%
25		3	1	1	1	1	1	0	0	0.0%	0.0%
50		3	1	1	1	1	1	0	0	0.0%	0.0%
100		3	0.8	0.7627	0.8373	0.7	0.9	0.05774	0.1	12.5%	20.0%
200		3	0	0	0	0	0	0	0		100.0%
400		3	0	0	0	0	0	0	0		100.0%

96h Survival Rate Detail

C-µg/L	Control Type	Rep 1	Rep 2	Rep 3
0	Dilution Water	1	1	1
25		1	1	1
50		1	1	1
100		0.9	0.7	0.8
200		0	0	0
400		0	0	0

96h Survival Rate Binomials

C-µg/L	Control Type	Rep 1	Rep 2	Rep 3
0	Dilution Water	10/10	10/10	10/10
25		10/10	10/10	10/10
50		10/10	10/10	10/10
100		9/10	7/10	8/10
200		0/10	0/10	0/10
400		0/10	0/10	0/10

Appendix C
Chain-of-Custody Form

OnSite Environmental Inc.

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

Laboratory Reference #: 11-265

Laboratory: Rainier Environmental

Attention: Eric Tollefson

Address: 5013 Pacific Highway E, Suite 20, Fife, WA 98424

Phone Number: (253) 922-8898

Turnaround Request

1 Day 2 Day 3 Day

Standard

Other: 1 Week

Project Manager: David Baumeister

email: dbaumeister@onsite-env.com

Project Number: J-1389

Project Name:

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	# of Cont.	Requested Analyses
	OWS #1	11/24/25	13:34	S	1	Fish Bioassay (Dangerous Waste 80-12 Test) T25-669
	OWS #3	11/24/25	14:22	S	1	Fish Bioassay (Dangerous Waste 80-12 Test) T25-670

Signature	Company	Date	Time	Comments/Special Instructions
Relinquished by:	OSE	12/4/25	1600	
Received by:	UPS			
Relinquished by:	UPS			
Received by: Eric Tollefson	RAINIER	12/5/25	1340	
Relinquished by:				
Received by:				

Chain of Custody

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

Company: DH ENVIRONMENTAL
Project Number: J-1389 PO 1188
Project Name: FAIRHAVEN SHIPYARD
Project Manager: NATHAN KRUSE
Sampled by: N. KRUSE

Turnaround Request (in working days)

(Check One)

☐ Same Day ☒ 1 Day
☐ 2 Days ☐ 3 Days
☐ Standard (7 Days)
☐ _____ (other)

Laboratory Number: 11-265

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	Number of Containers	NWTPH-HCID	NWTPH-Gx/BTEX (8021☐ 8260☐)	NWTPH-Gx	NWTPH-Dx (SG Clean-up☐)	Volatiles 8260 D	Halogenated Volatiles 8260	EDB EPA 8011 (Waters Only)	Semivolatiles 8270/SIM (with low-level PAHs)	PAHs 8270/SIM (low-level)	PCBs 8082	Organochlorine Pesticides 8081	Organophosphorus Pesticides 8270/SIM	Chlorinated Acid Herbicides 8151	Total RCRA Metals + Cu, Ni, Zn	Total MTCA Metals	TCLP Metals	HEM (oil and grease) 1664	TX 9076	FLASH		Fish Bioassay	% Moisture
1	OIL AST	11/24	1300	PROD	5										X				X				X	X			
2	DRUM	11/24	1312	H_2O	6					X					X				X								
3	OWS #1	11/24	1334	SOLID	6					X					X				X							(X)	X
4	OWS #3	11/24	1422	SOLID	6					X					X				X							(X)	X
5	OWS #2	11/24	1443	H_2O	6					X					X				X								

	Signature	Company	Date	Time
Relinquished		DH Enviro	11/25/25	11:50
Received	Aidan Prell	OSE	11/25/25	1150
Relinquished				
Received				
Relinquished				
Received				
Reviewed/Date		Reviewed/Date		

Comments/Special Instructions

PLEASE SEND RESULTS TO DATA@DHENVIRO.COM

(X) Added 12/4/25 - DB (1 week TAT)

Data Package: Standard ☐ Level III ☐ Level IV ☐

Chromatograms with final report ☐ Electronic Data Deliverables (EDDs) ☐