



WASHINGTON STATE  
DEPARTMENT OF  
ECOLOGY

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Southwest Regional Office  
Toxics Cleanup Program  
PO Box 47775  
Olympia, WA 98504-7775  
360-407-6240

## TRANSMITTAL MEMO

Date: March 26, 2013

TO: Mr. Aaron Galer  
Williams – Northwest Pipeline

RE: Northwest Pipeline GP, Deer Island/Kalama #2 MS  
SW1201

Subject: Explanation of Timeline

**NOTE:** The determination date is the date Ecology approved the No Further Action status for the site. Final payment, EIM Data submission, once received, the NFA letter was released.

Ecology Determination date: March 25, 2013

Email Customer Notification: March 26, 2013

Payment received date: May 1, 2013

EIM Data successfully uploaded: March 20, 2013

Ecology Determination letter mailed/sent: May 7, 2013





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

March 25, 2013

Mr. Aaron Galer  
Environmental Scientist III  
Williams – Northwest Pipeline  
295 Chipeta Way # 1  
Salt Lake City, UT 84108-1285

**Re: No Further Action at the following Site:**

- **Name:** Northwest Pipeline GP, Deer Island/Kalama #2 MS
- **Address:** 468 Hendrickson Road, Kalama, WA 98625
- **Facility/Site No.:** 6227324
- **Cleanup/Site ID No.:** 11730
- **VCP Project No.:** SW1201

Dear Mr. Galer:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Northwest Pipeline GP, Deer Island/Kalama #2 MS facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

**Issue Presented and Opinion**

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Is further remedial action necessary to clean up contamination at the Site?

**NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.**

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.



### **Description of the Site**

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This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following confirmed or suspected release(s):

- Mercury in Soil
- Arsenic in Soil

**Enclosure A** includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

### **Basis for the Opinion**

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This opinion is based on the information contained in the following documents:

1. Portnoy Environmental, Inc.; Site Assessment and Remedial Action Report, Deer Island/Kalama #2 Meter Station, 360 Elevator Road, Kalama, Washington, December 2012.
2. Williams Gas Pipeline, Environmental Partners, Inc., and Portnoy Environmental, Inc.; Terrestrial Ecological Evaluation Summary Report, Northwest Pipeline GP, Meter Station Facilities Throughout Washington State, dated November 2011.
3. Northwest Pipeline Corporation; Independent Remedial Action Report on Northwest Pipeline Corporation's Remediation of Mainline Meter Sites, September 28, 1993.
4. Northwest Pipeline Corporation; Report to Washington State Department of Ecology, Southwest Washington Region, Release and Independent Actions for Mercury Contaminated Natural Gas Meter Houses, June 21, 1991.

Those documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. You can make an appointment by calling the SWRO resource contact at (360) 407-6365.

This opinion is void if any of the information contained in those documents is materially false or misleading.

## Analysis of the Cleanup

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Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

### 1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described below and in **Enclosure A**.

Formerly, the facility used two mercury-containing manometers, one positive displacement meter, and two thermowells. Mercury meters and thermowells both have the potential to release mercury. The meters and thermowells were located above grade, over a soil and gravel surface, within a metal-framed building. Site assessment and remedial work in 1990 indicated that mercury soil contamination was present. The 1990 remedial action consisted of the removal of six drums of gravel and soil from under and around the meter stand to a maximum depth of 30 inches. Verification sampling results from a three-point composite sample showed a residual concentration of 14 milligrams per kilogram (mg/kg) mercury in the remediated area. However, this remedial action was poorly documented and does not meet the substantive requirements of MTCA.

Therefore, further Site assessment and remedial work was conducted in 2008 and 2009 that included the collection of 107 surface soil samples and 176 subsurface soil samples from a grid-based and targeted approach. A total of 308 soil samples were submitted for mercury analysis and 115 samples were submitted for arsenic analysis. Arsenic was analyzed because it has previously been detected above cleanup levels at other Northwest Pipeline sites. Several soil samples exceeded the mercury Method A Cleanup Level (CUL) for Unrestricted Land Uses value of 2.0 mg/kg and/or the Site-specific Terrestrial Ecological Evaluation (TEE) arsenic CUL of 16 mg/kg. This assessment was successful in defining the horizontal and vertical extent of contamination. Assessment results are shown in Figures DKMS-3 and -6. Arsenic contamination was limited to areas within the facility boundary and within 24 inches of the ground surface. Mercury contamination extended beyond the fenced boundary of the facility and was within 36 inches of the ground surface. The maximum arsenic and mercury concentrations were 41 mg/kg and 240 mg/kg, respectively.

The Toxicity Characteristic Leaching Procedure (TCLP), EPA Method 1311, was also run on four samples, including the sample with the highest detected mercury concentration (240 mg/kg). This sample had a TCLP result of 0.017 milligrams per liter (mg/L). Concentrations that are greater than the 0.2 mg/L mercury limit require a designation of characteristically hazardous waste under the Resource Conservation and

Recovery Act and a dangerous waste designation under the Washington State Dangerous Waste Regulations (WAC 173-303). In addition, total mercury concentrations greater than 100 mg/kg require a WT02 designation under the Washington Dangerous Waste Regulations.

**2. Establishment of cleanup standards.**

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

The MTCA Method A mercury CUL for Unrestricted Land Use (2 mg/kg) was used for soil. As demonstrated in the above-referenced TEE Summary Report, the Method A CUL is also protective of the terrestrial ecological exposure pathway. However, the Site-specific TEE arsenic CUL of 16 mg/kg was below the arsenic Method A CUL.

Standard points of compliance were used for the Site. For soil cleanup levels based on human exposure via direct contact or other exposure pathways where contact with the soil is required to complete the pathway, the point of compliance was established in the soils throughout the Site from the ground surface to 15 feet below grade.

**3. Selection of cleanup action.**

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The cleanup action consisted of the excavation and removal of source material (excavation and off-Site disposal of mercury- and arsenic-contaminated soil). This work was completed in December 2009 for mercury and June 2012 for arsenic.

**4. Cleanup.**

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

A total of approximately 197.3 tons of non-hazardous soil was transported to Waste Management's Hillsboro landfill near Portland, Oregon. A total of 13.55 tons of WT02 soil were transported to Chemical Waste Management's Subtitle C facility in Arlington, Oregon. Additionally, one drum of soil was generated due to the presence of visible mercury. This drum was disposed at Chemical Waste Management's Retort facility in

Wisconsin. As shown in Table DKMS-3, a total of 77 final performance samples were analyzed for mercury. As shown in Table DKMS-4, a total of nine final performance samples were analyzed for arsenic. As shown in Figures DKMS-4, -4A, -5, -6, -7, -7A, and -8, the maximum depth of the excavation was 36 inches below grade. All final performance sample results were less than the applicable CULs.

### **Listing of the Site**

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Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List.

### **Limitations of the Opinion**

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**1. Opinion does not settle liability with the state.**

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

**2. Opinion does not constitute a determination of substantial equivalence.**

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

**3. State is immune from liability.**

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Mr. Aaron Galer  
March 25, 2013  
Page 6

### **Termination of Agreement**

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Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (SW1201).

For more information about the VCP and the cleanup process, please visit our web site: [www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm](http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm). If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at (360) 407-6247 or via e-mail at [steve.teel@ecy.wa.gov](mailto:steve.teel@ecy.wa.gov).

Sincerely,



Steve Teel, LHG  
Hydrogeologist  
SWRO Toxics Cleanup Program

ST/ksc:Deer Island MS NFA SW1201

Enclosures (1): A – Description and Diagrams of the Site

By certified mail: (7010 2780 0000 2503 5765)

cc: Eric Koltes, Environmental Partners, Inc.  
Mr. Alan Hopkins, P.G., Portnoy Environmental  
Port of Kalama  
Scott Rose – Ecology  
Dolores Mitchell - Ecology

## **Enclosure A**

### **Description and Diagrams of the Site**

The Deer Island/Kalama #2 MS facility is located at 468 Hendrickson Drive in Kalama, Cowlitz County, Washington (45 59 18.45 N, -122 50 10.40 W). The entrance to the facility is at 360 Elevator Road. The facility consists of two adjacent natural gas meter stations within the same fenced enclosure where gas is being regulated and metered to a local distribution company or customer. This facility is part of the Northwest Pipeline/Williams Gas Pipeline (natural gas).

The primary contaminant of potential concern at meter stations is inorganic mercury. Releases of mercury could have occurred due to accidental spills during maintenance or calibration of differential pressure manometers (meters) that contained mercury. Northwest Pipeline/Williams Gas Pipeline (NWPL GP) used these meters to measure pressure on both sides of an orifice plate to calculate flow volumes through the pipeline, laterals, and taps that supply their customers. A secondary source of mercury releases are from "thermowells." Thermowells are test tube shaped "wells" installed in the meter station piping into which thermometers were placed to measure gas temperatures. In some instances, mercury was also placed in the well to improve the thermal conductance between the well and the thermometer. The thermowells did not contain large amounts of mercury, but spillage could occur when they were filled with mercury or when a thermometer was inserted or removed. Use of mercury at meter stations was phased out by 1993.

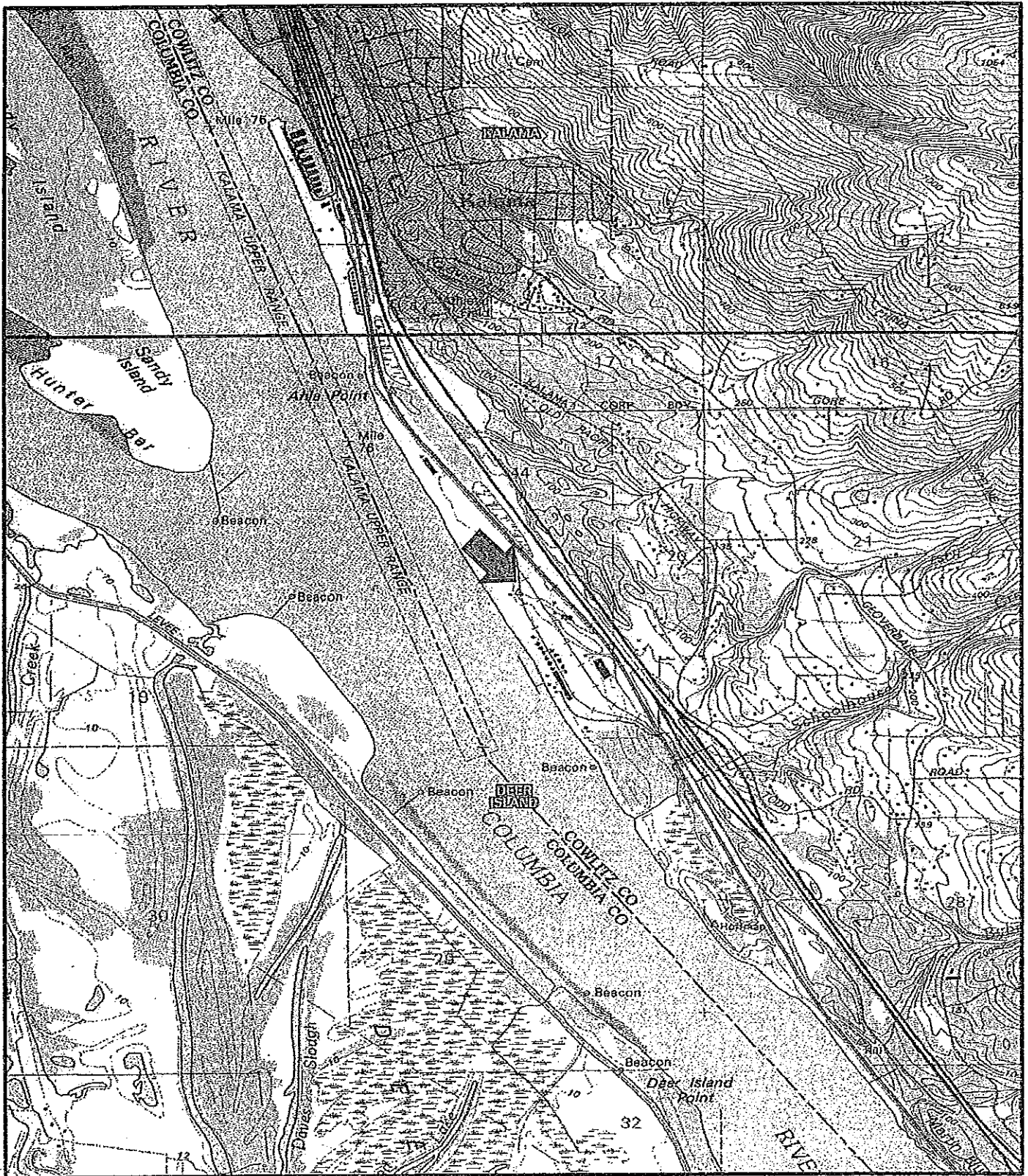
Formerly, the Deer Island portion of the facility used two mercury-containing differential pressure manometers and one thermowell and the Kalama #2 portion of the facility contained one positive displacement meter and one thermowell. Site assessment and remedial activities were conducted in 1990. The Deer Island remedial action consisted of the removal of six drums of gravel and soil from under and around the meter stand to a maximum depth of 30 inches. Verification sampling results from a three-point composite sample showed a residual concentration of 14 milligrams per kilogram (mg/kg) mercury in the remediated area. The 1990 assessment did not identify any contamination in the Kalama #2 portion of the facility. However, these remedial actions were poorly documented and did not meet the substantive requirements of MTCA. Construction and/or remedial activities conducted before 2005 at meter stations also may have resulted in the disturbance and potential spreading of mercury impacted soil. Additionally, at some meter stations, clean fill was placed over contaminated soil. Further assessment activities at the Site in 2008 and 2009, which did meet the substantive requirements of MTCA, confirmed and characterized the extent of mercury and arsenic contamination in soil which was then cleaned up.

#### **ATTACHMENTS (from consultant report)**

Figures DKMS-1 through -8

Tables DKMS-3 and -4





KEY: SOURCE: USGS 7.5 Minute Quadrangle (Topographic)

DEER ISLAND, OR-WA  
KALAMA, WA

PROJECT 10179.07

PREPARED FOR NORTHWEST PIPELINE GP - WILLIAMS GAS PIPELINE

LOCATION 45.98861N, 122.83620W

SHEET 1 of 1

DRAWN BY ET

REVIEWED BY TLJ

DATE 9-14-2011

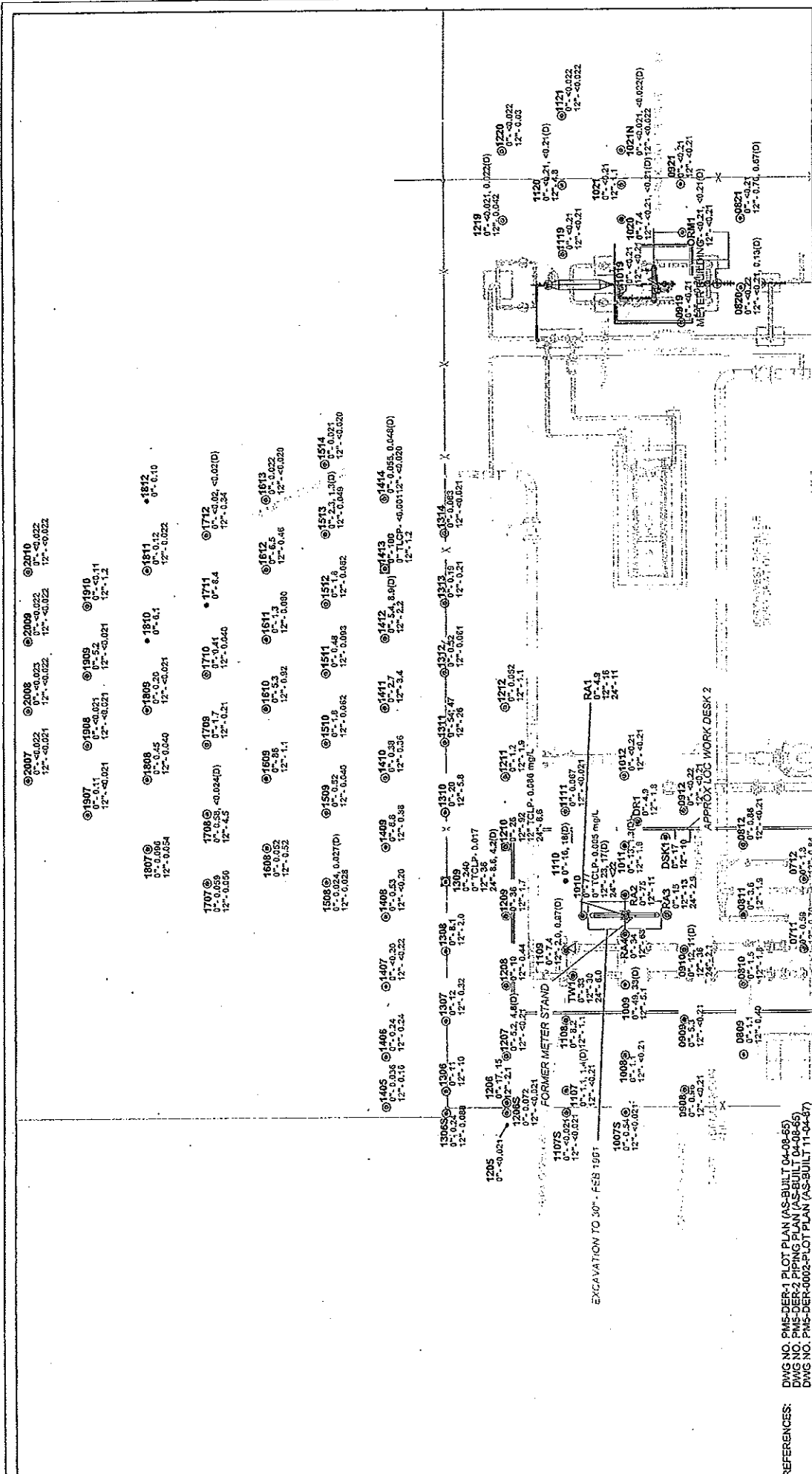
**PEI**

FIGURE DKMS-1  
GENERAL VICINITY MAP  
DEER ISLAND/KALAMA #2 METER STATION



SCALE: APPROX 1"=2000'





REFERENCES: DWS NO. PMS-DEB-1 PLOT PLAN (AS-BUILT 04-08-85)  
 DWS NO. PMS-DEB-2 PIPING PLAN (AS-BUILT 04-08-85)  
 DWS NO. PMS-DEB-002 PLOT PLAN (AS-BUILT 11-04-87)

- NOT:
- - SURFACE SAMPLE LOCATION
  - - SUBSURFACE SAMPLE LOCATION
  - ⊙ - BOTH SURFACE AND SUBSURFACE SAMPLE LOCATION
  - GREEN - Hg SAMPLE RESULT - CLEANUP LEVEL
  - RED - Hg SAMPLE RESULT - CLEANUP LEVEL
  - △ - THERMOWELL LOCATION

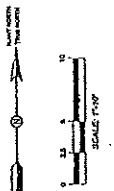
CLEANUP LEVEL  
 Hg - 2 mg/kg

ASSESSMENT SAMPLE NAMING CONVENTION:  
 Unless otherwise noted, the prefix "DKSS-" was applied to each labeled grid node sample followed by a colon with the sample depth indicated in inches (e.g., DKSS-1010:12 represents a sample collected at grid node 1010 at a depth of 12 inches below grade).  
 Field duplicate sample results are denoted with a (D).

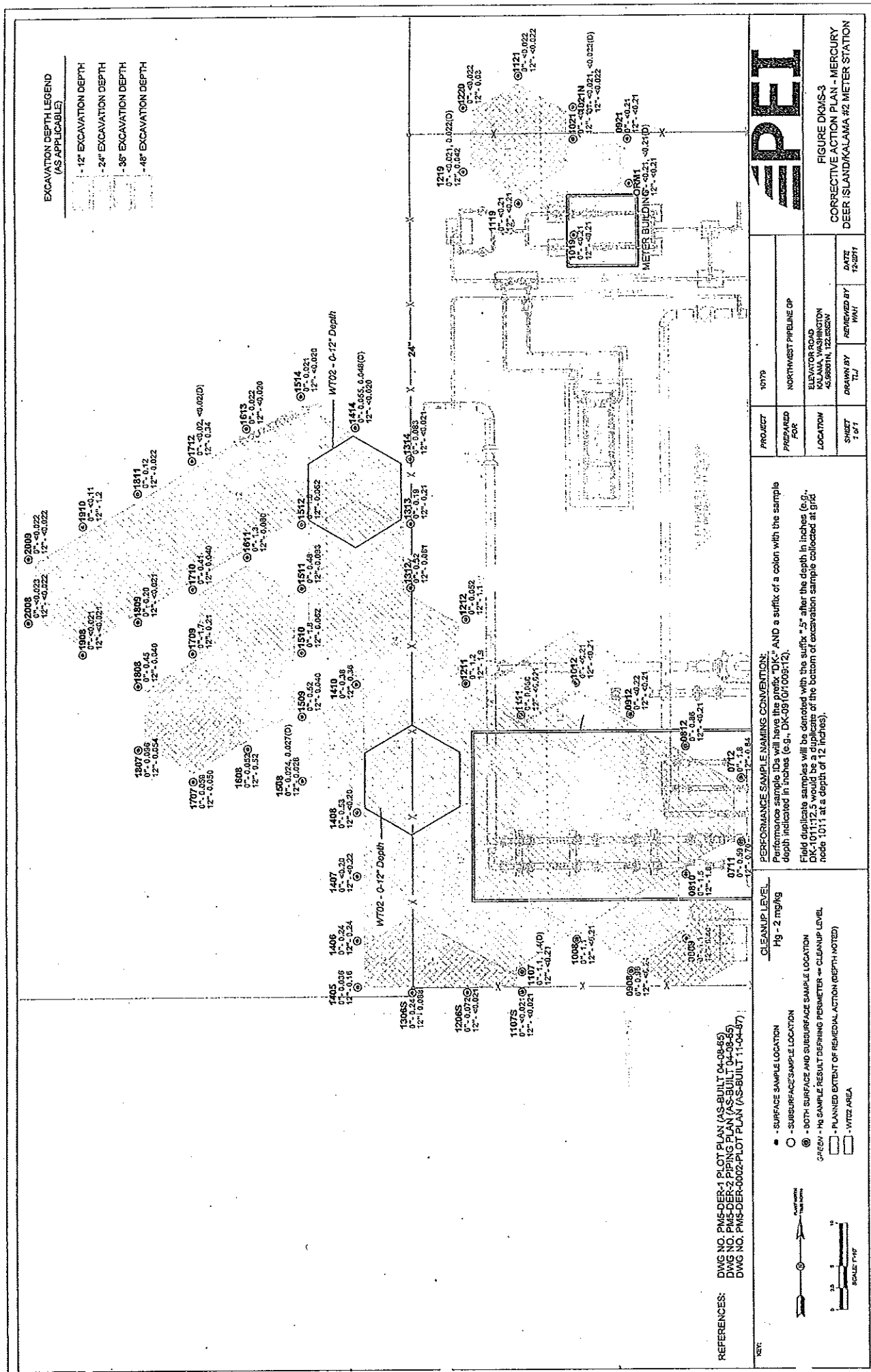
|              |                                                           |
|--------------|-----------------------------------------------------------|
| PROJECT      | 10179                                                     |
| PREPARED FOR | NORTHWEST PIPELINE CO.                                    |
| LOCATION     | ELEVATOR ROAD<br>KALAMA, WASHINGTON<br>AS-BUILT, 12-03-20 |
| SHEET        | 1 of 1                                                    |
| DRAWN BY     | TJL                                                       |
| REVIEWED BY  | MM                                                        |
| DATE         | 12-06-11                                                  |



FIGURE DKMS-2  
 ASSESSMENT RESULTS - MERCURY  
 DEER ISLAND/KALAMA #2 METER STATION



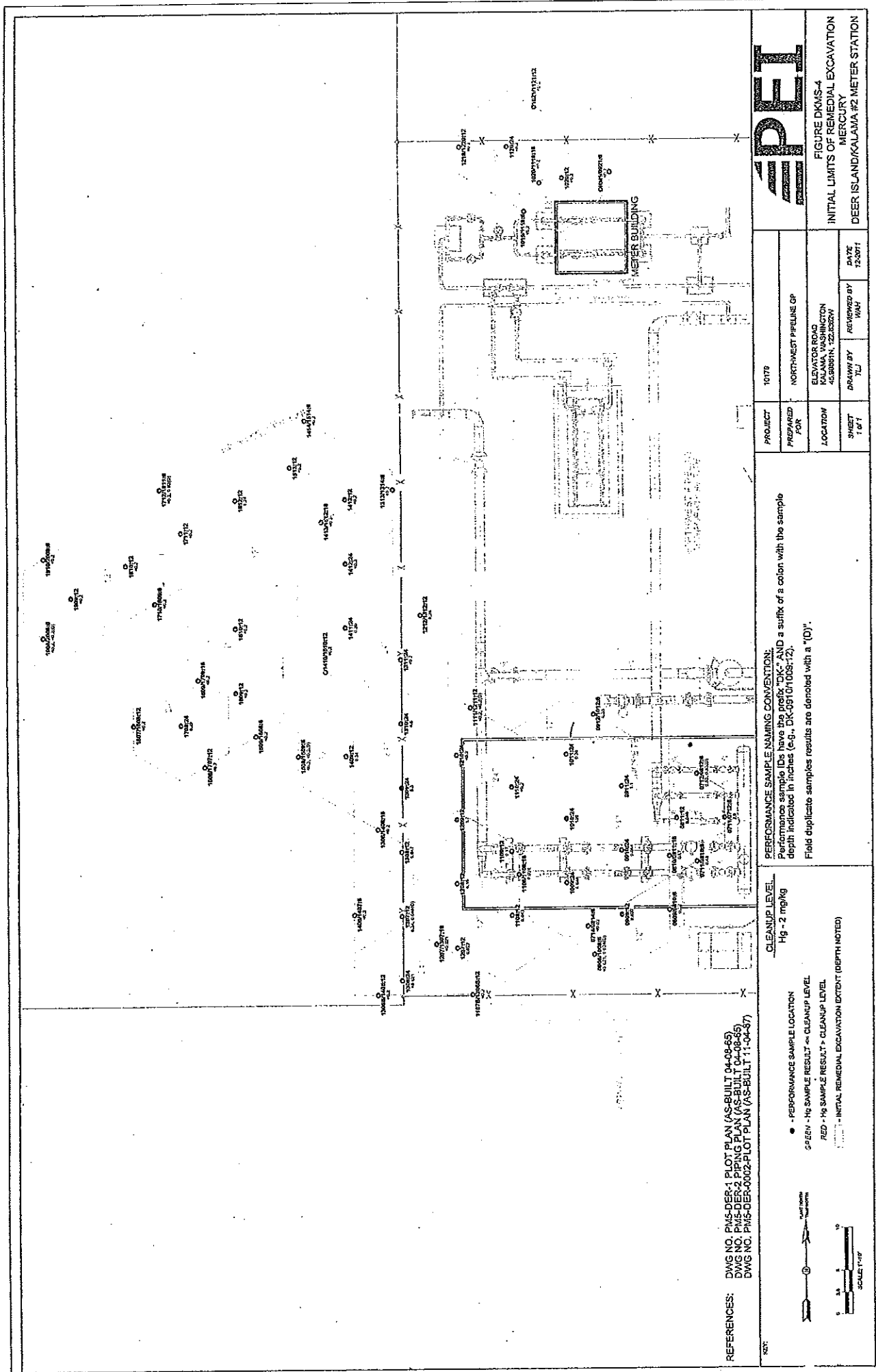












REFERENCES: DWG NO. PHS-DEER-1 PLOT PLAN (AS-BUILT 04-08-85)  
 DWG NO. PHS-DEER-2 PIPING PLAN (AS-BUILT 04-08-85)  
 DWG NO. PHS-DEER-2002-PILOT PLAN (AS-BUILT 11-04-87)

CLEANUP LEVEL  
 Hg - 2 mg/kg  
 • PERFORMANCE SAMPLE LOCATION  
 GREEN - Hg SAMPLE RESULT < CLEANUP LEVEL  
 RED - Hg SAMPLE RESULT > CLEANUP LEVEL  
 --- INITIAL REMEDIAL EXCAVATION EXTENT (DEPTH NOTED)

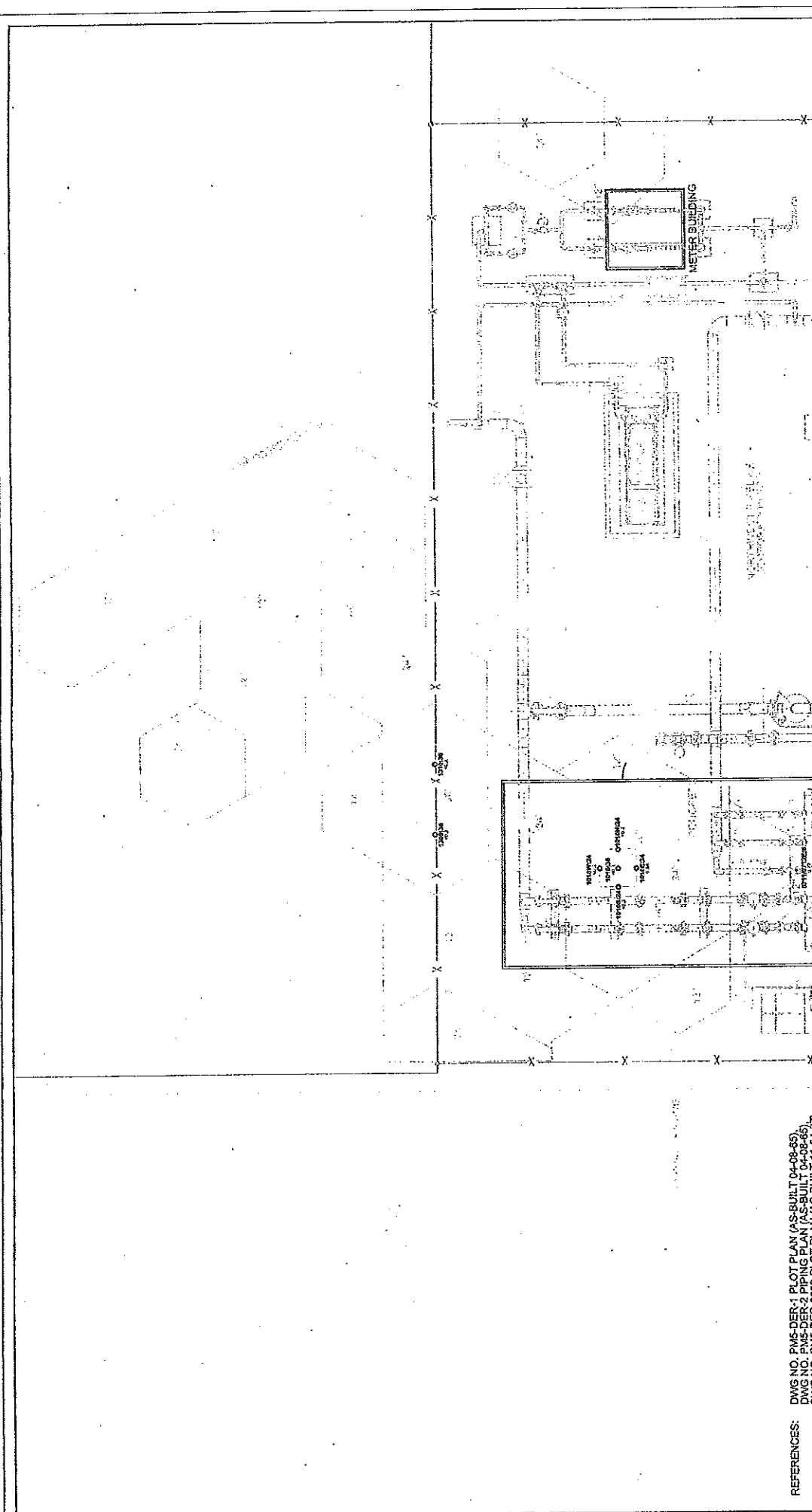
PERFORMANCE SAMPLE NAMING CONVENTION:  
 Performance sample IDs have the prefix "DK" AND a suffix of a colon with the sample depth indicated in inches (e.g., DK-09101008:12).  
 Field duplicate samples results are denoted with a "(D)".

|              |                                                             |
|--------------|-------------------------------------------------------------|
| PROJECT      | 10178                                                       |
| PREPARED FOR | NORTHWEST PIPELINE CORP.                                    |
| LOCATION     | ELEVATOR ROAD<br>KALAMA, WASHINGTON<br>45.98851N, 122.8382W |
| SHEET 1 OF 1 | DRAWN BY TLD<br>REVIEWED BY KAN<br>DATE 12/20/11            |

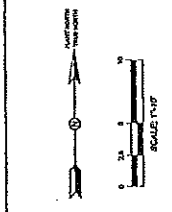


FIGURE DKMS-4  
 INITIAL LIMITS OF REMEDIAL EXCAVATION  
 MERCURY  
 DEER ISLAND/KALAMA #2 METER STATION





REFERENCES: DWS NO. PMS-DER-1 PLOT PLAN (AS-BUILT 04-08-85)  
 DWS NO. PMS-DER-1 PLOT PLAN (AS-BUILT 04-08-85)  
 DWS NO. PMS-DER-2002 PLOT PLAN (AS-BUILT 11-04-87)



- PERFORMANCE SAMPLE LOCATION
- GREEN - Hg SAMPLE RESULT <= CLEANUP LEVEL
- REMEDIAL EXCAVATION EXTENT (DEPTH NOTED) - RE-DIG 1
- REMEDIAL EXCAVATION EXTENT (DEPTH NOTED) - PREVIOUS PHASE

CLEANUP LEVEL  
 Hg - 2 mg/kg

PERFORMANCE SAMPLE NAMING CONVENTION:  
 Performance sample IDs have the prefix "TX" and a suffix of a colon with the sample depth indicated in inches (e.g., DK-09101009:12).  
 Field duplicate samples results are denoted with a "(D)".

|              |                                                             |
|--------------|-------------------------------------------------------------|
| PROJECT      | 10779                                                       |
| PREPARED FOR | NORTHWEST PIPELINE GP                                       |
| LOCATION     | 15 SW 10TH ROAD<br>KALAMA, WASHINGTON<br>411.000N, 122.800W |
| SHEET        | 1 of 1                                                      |
| DRAWN BY     | TJ                                                          |
| REVIEWED BY  | WAT                                                         |
| DATE         | 7/20/11                                                     |

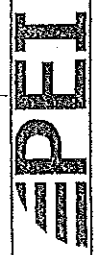
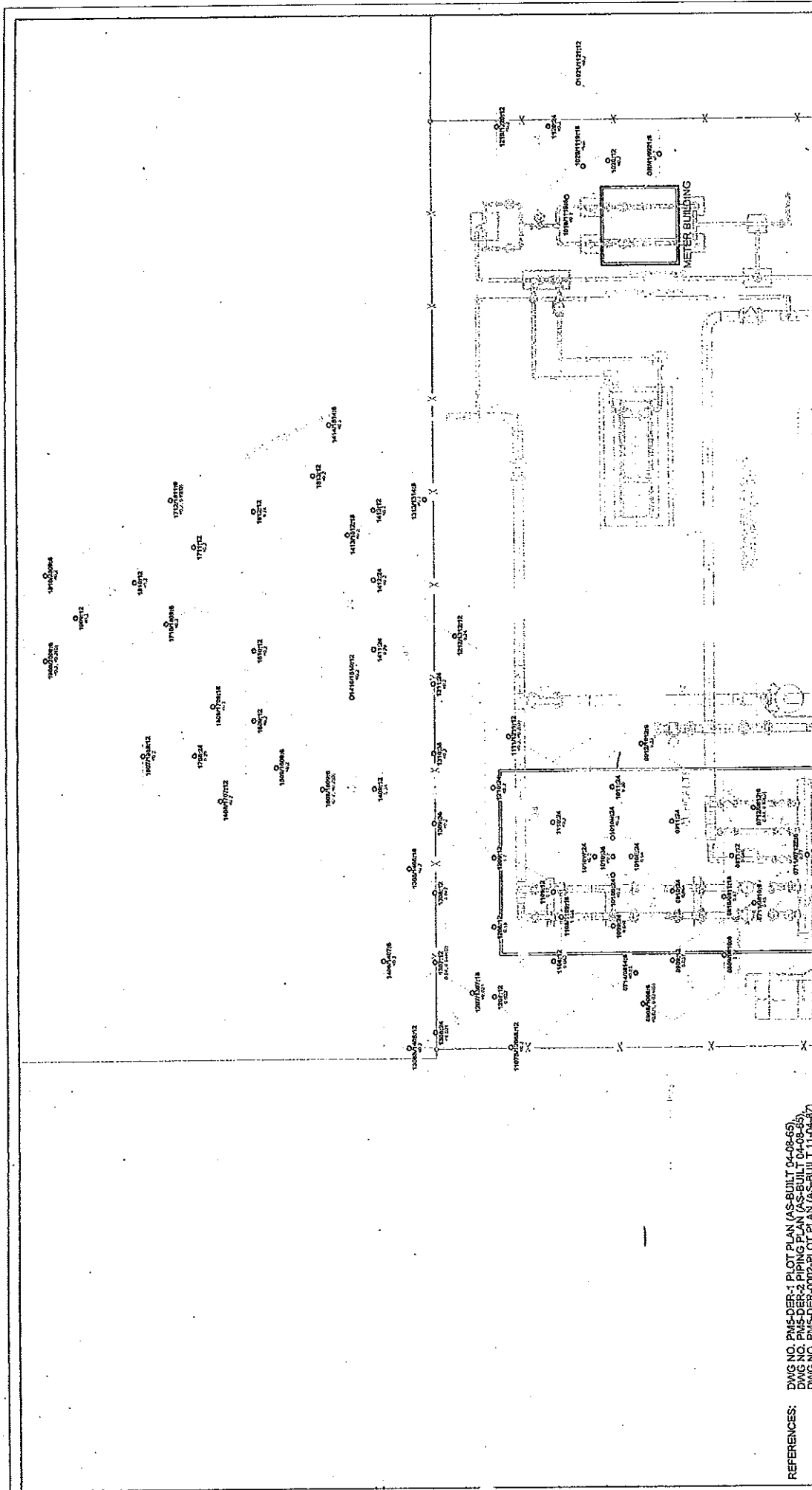


FIGURE DWS-4A  
 LIMITS OF REMEDIAL EXCAVATION  
 RE-DIG 1 - MERCURY  
 DEER ISLAND/KALAMA #2 METER STATION





REFERENCES: DWS NO. PMS-DER-1 PLOT PLAN (AS-BUILT 04-08-65)  
 DWS NO. PMS-DER-2 PIPING PLAN (AS-BUILT 04-08-65)  
 DWS NO. PMS-DER-002 PLOT PLAN (AS-BUILT 11-04-87)

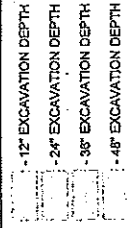
NOTE:  
 ● - PERFORMANCE SAMPLE LOCATION  
 GREEN - Hg SAMPLE RESULT < CLEANUP LEVEL  
 [Hatched Area] - REMEDIAL EXCAVATION EXTENT (DEPTH NOTED) - FINAL  
 CLEANUP LEVEL  
 Hg - 2 mg/kg

PERFORMANCE SAMPLE NAMING CONVENTION:  
 Performance sample IDs have the prefix 'DK-' and a suffix of a colon with the sample depth indicated in inches (e.g., DK-4910/100812).  
 Field duplicate samples results are denoted with a '(D)'.

|             |                                                            |                                                                                                        |
|-------------|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| PROJECT     | 10179                                                      | PEI<br>PACIFIC ENVIRONMENTAL INC.                                                                      |
|             | PREPARED FOR                                               |                                                                                                        |
|             | NORTHWEST PIPELINE CO                                      |                                                                                                        |
| LOCATION    | ELEVATOR ROAD<br>KALAMA, WASHINGTON<br>45.8866N, 122.4032W | FIGURE DKMS-5<br>FINAL LIMITS OF REMEDIAL EXCAVATION<br>MERCURY<br>DEER ISLAND/KALAMA #2 METER STATION |
|             |                                                            |                                                                                                        |
| SHEET       | 1 of 1                                                     | DATE                                                                                                   |
| DRAWN BY    | TJ                                                         |                                                                                                        |
| REVIEWED BY | WAF                                                        | 12-08-11                                                                                               |



EXCAVATION DEPTH LEGEND  
(AS APPLICABLE)



REFERENCES: DWG NO. PM5-DER-1 PLOT PLAN (AS-BUILT 04-08-85)  
DWG NO. PM5-DER-2 PIPING PLAN (AS-BUILT 04-08-85)  
DWG NO. PM5-DER-0002-PLOT PLAN (AS-BUILT 11-04-87)

- SURFACE SAMPLE LOCATION  
○ SUBSURFACE SAMPLE LOCATION  
◎ BOTH SURFACE AND SUBSURFACE SAMPLE LOCATION  
GREEN - Hg SAMPLE RESULT DEPENDING PERMETER → CLEANUP LEVEL  
□ PLANNED EXTENT OF REMEDIAL ACTION (DEPTH NOTED)

CLEANUP LEVEL  
Hg - 2 mg/kg  
As - 15 mg/kg

PERFORMANCE SAMPLE NAMING CONVENTION:  
Performance sample IDs will have the prefix "DK" AND a suffix of a colon with the sample depth indicated in inches (e.g., DK-0910100812).  
Field duplicate samples will be denoted with the suffix ".5" after the depth in inches (e.g., DK-101112.5 would be a duplicate of the bottom of excavation sample collected at grid node 1011 at a depth of 12 inches).

PROJECT 10179

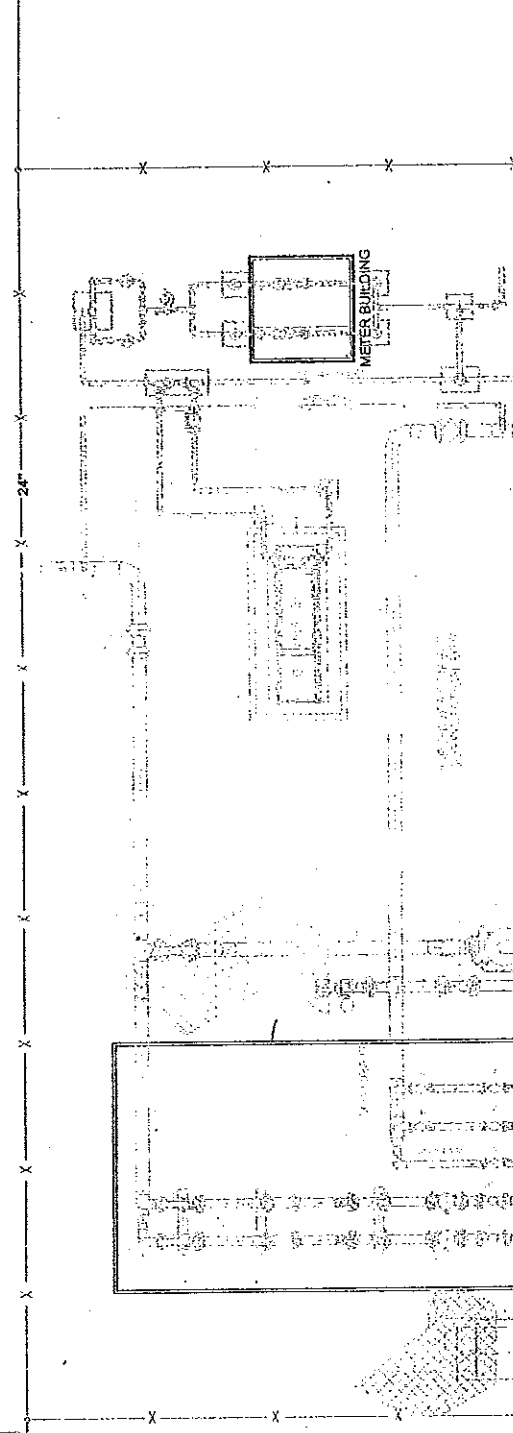
PREPARED FOR NORTHWEST PIPELINE CO

LOCATION ELVATOR ROAD  
KALAMA, WASHINGTON  
45.08851N, 122.6822W

SHEET 1 OF 1 DRAWN BY TLI REVIEWED BY WWH DATE 12/28/11

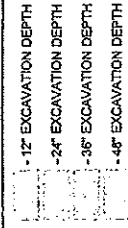
PEI  
PACIFIC ENVIRONMENTAL  
INCORPORATED

FIGURE DK14S-6  
CORRECTIVE ACTION PLAN/ARSENIC  
DEER ISLAND/KALAMA #2 METER STATION





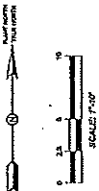
EXCAVATION DEPTH LEGEND  
(AS APPLICABLE)



REFERENCES: DWG NO. PMS-DER-1 PLOT PLAN (AS-BUILT 04-08-85)  
DWG NO. PMS-DER-2 PIPING PLAN (AS-BUILT 04-08-85)  
DWG NO. PMS-DER-0002-PILOT PLAN (AS-BUILT 11-04-87)

CLEANUP LEVEL  
As - 16 mg/kg

- PERFORMANCE SAMPLE LOCATION
- GREEN - 16 mg/kg SAMPLE RESULT < CLEANUP LEVEL
- RED - 16 mg/kg SAMPLE RESULT > CLEANUP LEVEL
- INITIAL REMEDIAL EXCAVATION EXTENT (DEPTH NOTED)



PERFORMANCE SAMPLE NAMING CONVENTION:  
Performance sample IDs have the prefix "DK" and a suffix of a colon with the sample depth indicated in inches (e.g., DK-0870/100812).  
Field duplicate samples results are denoted with a "D".

PROJECT 10178

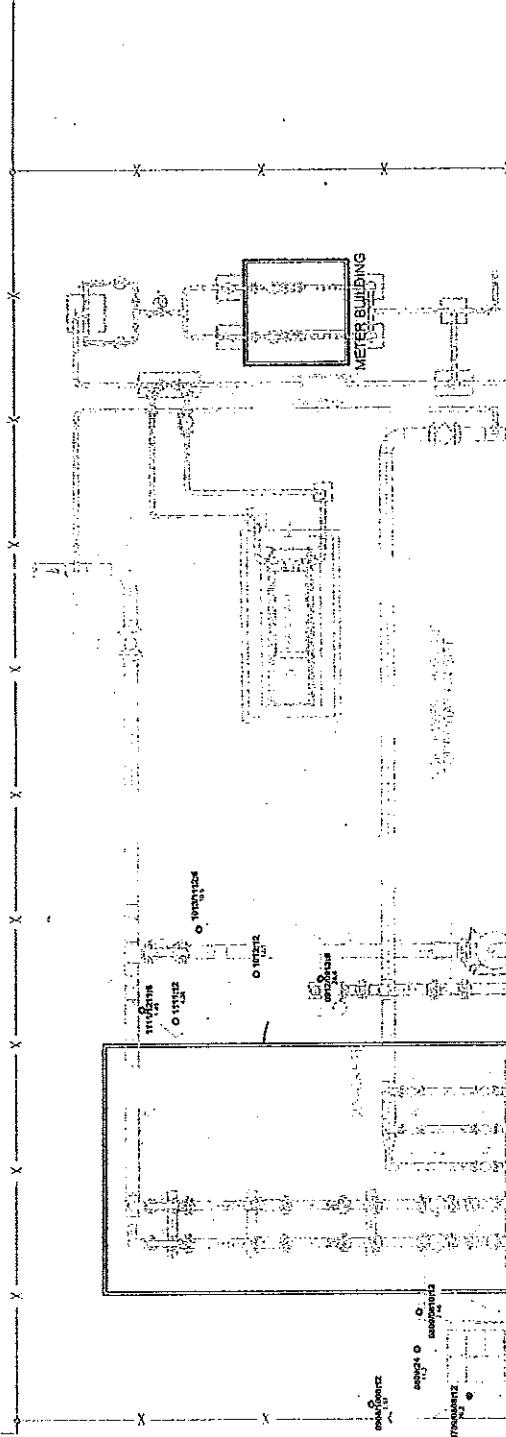
PREPARED FOR NORTHWEST PIPELINE GP

LOCATION ELEVATOR ROAD  
KALAMA WASHINGTON  
45.88871N, 122.8826W

SHEET 1 OF 1 DRAWN BY TJJ REVIEWED BY WAT DATE 12-2011

**PEI**  
PACIFIC ENVIRONMENTAL  
INCORPORATED  
2007 1ST AVENUE  
SUITE 200  
SEASIDE, CA 94062  
TEL: 415.762.1234  
WWW.PEI-INC.COM

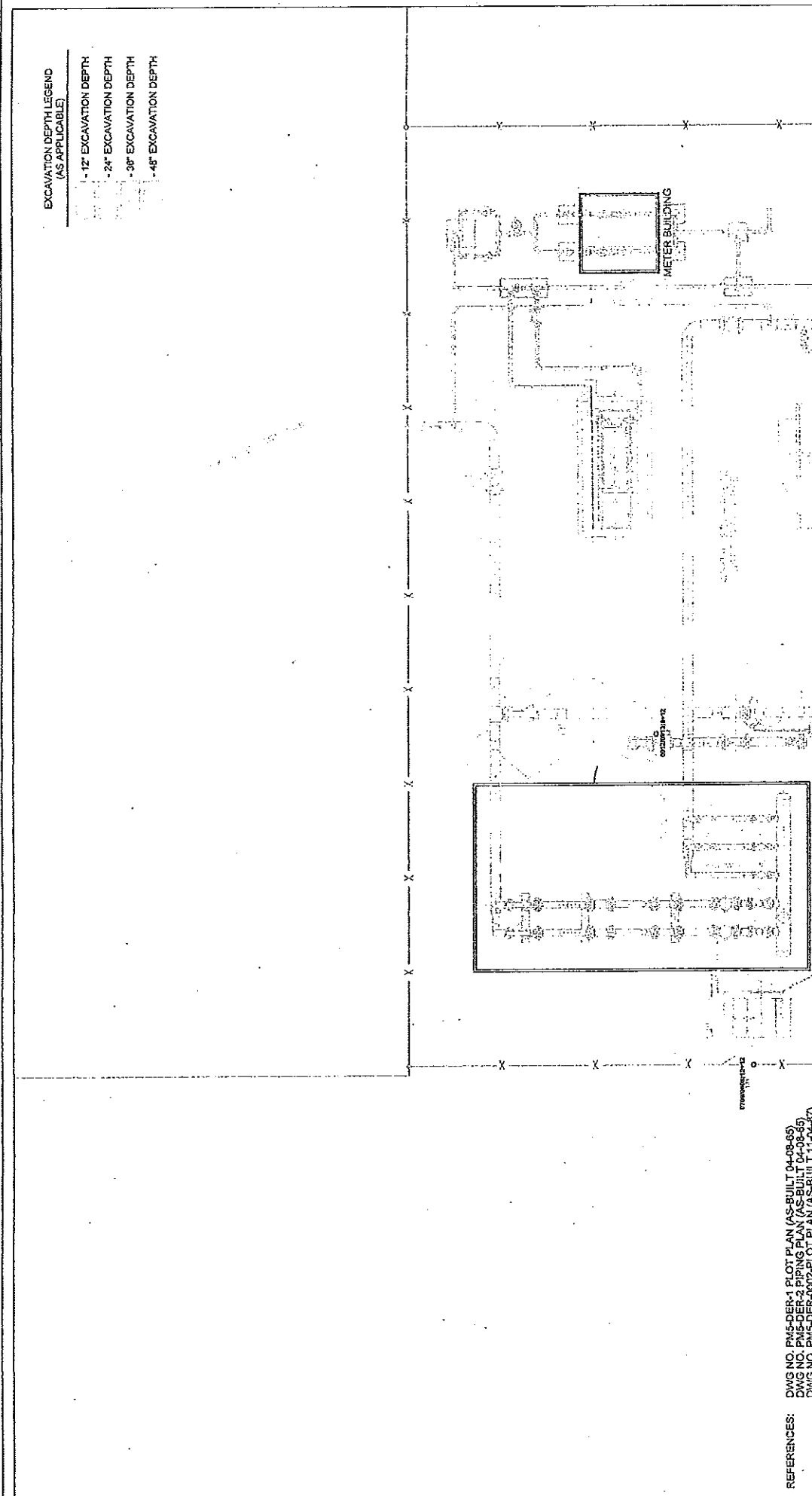
FIGURE DKMS-7  
INITIAL LIMITS OF REMEDIAL EXCAVATION  
ARSENIC  
DEER ISLAND/KALAMA #2 METER STATION





EXCAVATION DEPTH LEGEND  
(AS APPLICABLE)

- 12" EXCAVATION DEPTH
- 24" EXCAVATION DEPTH
- 36" EXCAVATION DEPTH
- 48" EXCAVATION DEPTH



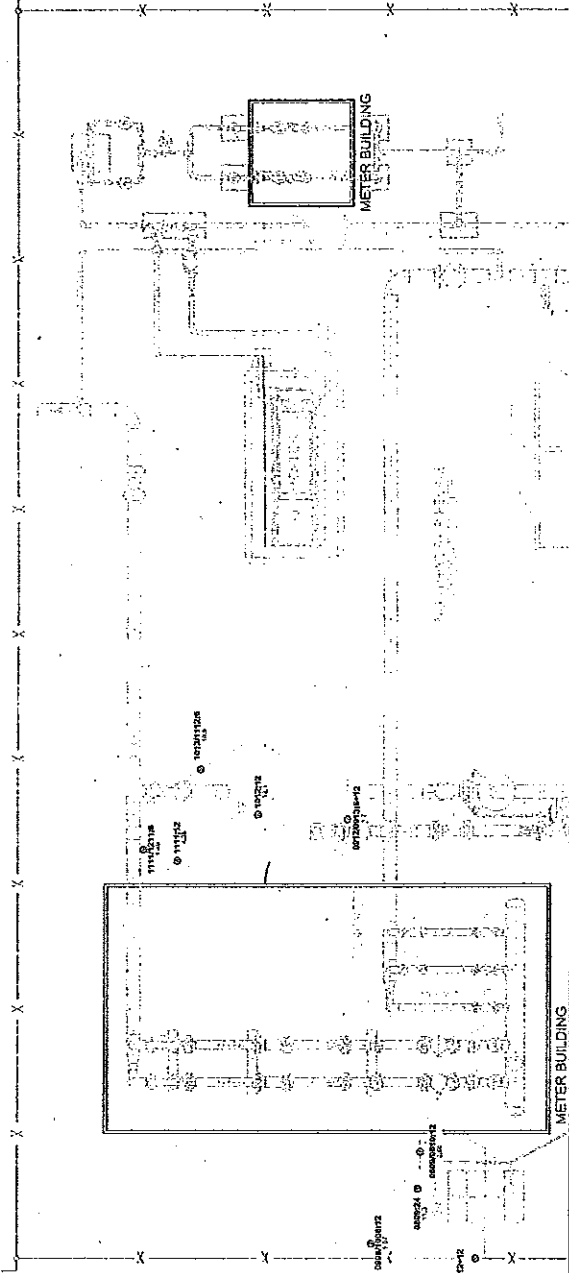
REFERENCES: DWG NO. PM5-DER-1 PLOT PLAN (AS-BUILT 04-08-85)  
 DWG NO. PM5-DER-2 PIRING PLAN (AS-BUILT 04-08-85)  
 DWG NO. PM5-DER-002-2 PLOT PLAN (AS-BUILT 11-04-87)

|                                                  |  |                                                                   |  |                                                                                                                                                 |  |
|--------------------------------------------------|--|-------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <div>1073</div> <div>NORTHWEST PIPELINE GP</div> |  | <div>ELEVATOR ROAD<br/>ALBANY, NY 12203</div> <div>LOCATION</div> |  | <div>FIGURE DKMS-7A</div> <div>LIMITS OF REMEDIAL EXCAVATION</div> <div>RE-DIG 1 - ARSENIC</div> <div>DEER ISLAND/KALAMA #2 METER STATION</div> |  |
| <div>PROJECT</div> <div>PREPARED FOR</div>       |  | <div>DATE</div> <div>12-20-11</div>                               |  | <div>REVIEWED BY</div> <div>PAH</div>                                                                                                           |  |
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# EXCAVATION DEPTH LEGEND (AS APPLICABLE)

- 12" EXCAVATION DEPTH
- 24" EXCAVATION DEPTH
- 36" EXCAVATION DEPTH
- 48" EXCAVATION DEPTH

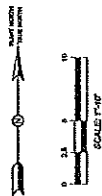


REFERENCES: DWG NO. PM5-DER-1 PLOT PLAN (AS-BUILT 04-08-65)  
 DWG NO. PM5-DER-2 PIPING PLAN (AS-BUILT 04-08-65)  
 DWG NO. PM5-DER-0002-PLOT PLAN (AS-BUILT 11-04-87)

- - PERFORMANCE SAMPLE LOCATION
- GREEN - HS SAMPLE RESULT < CLEANUP LEVEL
- REMEDIAL EXCAVATION EXTENT (DEPTH NOTED) - FINAL

CLEANUP LEVEL  
 As - 16 mg/kg

PERFORMANCE SAMPLE NAMING CONVENTION:  
 Performance sample IDs have the prefix "TK" and a suffix of a colon with the sample depth indicated in inches (e.g., TK-03101000:12).  
 Field duplicate samples results are denoted with a "DY".



REV

|              |                                                 |
|--------------|-------------------------------------------------|
| PROJECT      | 10170                                           |
| PREPARED FOR | NORTHWEST PIPELINE OF ELEVATOR ROAD             |
| LOCATION     | DEER ISLAND/KALAMA #2 METER STATION             |
| SHEET 1 of 1 | DRAWN BY TLJ<br>REVIEWED BY WHW<br>DATE 12-2011 |

**PEI**

FIGURE DKAWS-8  
 FINAL LIMITS OF REMEDIAL EXCAVATION  
 ARSENIC  
 DEER ISLAND/KALAMA #2 METER STATION



Table DKMS-3  
Performance Sample Analytical Results - Mercury  
Deer Island/Kalama #2 Meter Station  
VCP Project No.:SW1201

| Sample Designation                                          | Depth<br>(inches) | Date<br>Collected | Sample Type |        |           | Final<br>Performance<br>Sample | Total Mercury<br>Concentration<br>(mg/kg) |
|-------------------------------------------------------------|-------------------|-------------------|-------------|--------|-----------|--------------------------------|-------------------------------------------|
|                                                             |                   |                   | Sidewall    | Bottom | Duplicate |                                |                                           |
| DK-0809/0810:6                                              | 6                 | 12/2/09           | X           |        |           | X                              | 0.32                                      |
| DK-0908/1008:18                                             | 18                | 12/3/09           | X           |        |           | X                              | < 0.021                                   |
| DK-0908/1008:6                                              | 6                 | 12/2/09           | X           |        |           | X                              | < 0.021                                   |
| DK-0908/1008:6.5                                            | 6                 | 12/2/09           | X           |        | X         | X                              | 0.024                                     |
| DK-0909:12                                                  | 12                | 12/2/09           |             | X      |           | X                              | 0.037                                     |
| DK-1108:12                                                  | 12                | 12/3/09           |             | X      |           | X                              | 0.043                                     |
| DK-1207/1307:18                                             | 18                | 12/3/09           | X           |        |           | X                              | < 0.021                                   |
| DK-1207:12                                                  | 12                | 12/3/09           |             | X      |           | X                              | 0.022                                     |
| DK-1208:12                                                  | 12                | 12/3/09           |             | X      |           | X                              | 0.15                                      |
| DK-1209:12                                                  | 12                | 12/3/09           |             | X      |           | X                              | 1.7                                       |
| DK-1306:24                                                  | 24                | 12/3/09           |             | X      |           | X                              | < 0.021                                   |
| DK-1307:12                                                  | 12                | 12/3/09           |             | X      |           | X                              | 0.24                                      |
| DK-1307:12.5                                                | 12                | 12/3/09           |             | X      | X         | X                              | 0.048                                     |
| DK-1308:12                                                  | 12                | 12/3/09           |             | X      |           | X                              | 0.042                                     |
| DKSS-0711/0712:6                                            | 6                 | 12/4/09           | X           |        |           | Excavated                      | 2.9                                       |
| DKSS-0711/0712E:6                                           | 6                 | 12/8/09           | X           |        |           | X                              | 0.77                                      |
| DKSS-0711/0810:6                                            | 6                 | 12/4/09           | X           |        |           | X                              | 0.45                                      |
| DKSS-0712/0812:6                                            | 6                 | 12/4/09           | X           |        |           | X                              | 0.53                                      |
| DKSS-0712/0812:6.5                                          | 6                 | 12/4/09           | X           |        | X         | X                              | 0.83                                      |
| DKSS-0810/0811:18                                           | 18                | 12/4/09           | X           |        |           | X                              | 0.67                                      |
| DKSS-0811:12                                                | 12                | 12/4/09           |             | X      |           | X                              | 0.046                                     |
| DKSS-0910:24                                                | 24                | 12/4/09           |             | X      |           | X                              | 0.064                                     |
| DKSS-0911:24                                                | 24                | 12/5/09           |             | X      |           | X                              | 1.1                                       |
| DKSS-0912/1012:6                                            | 12                | 12/5/09           | X           |        |           | X                              | 0.33                                      |
| DKSS-1009:24                                                | 23                | 12/4/09           |             | X      |           | X                              | 0.048                                     |
| DKSS-1010:24                                                | 23                | 12/5/09           |             | X      |           | Excavated                      | 120                                       |
| DKSS-1010:36                                                | 36                | 12/8/09           |             | X      |           | X                              | <0.2                                      |
| DKSS-1010E:2                                                | 2                 | 12/8/09           |             | X      |           | X                              | 0.64                                      |
| DKSS-1010N:2                                                | 2                 | 12/8/09           |             | X      |           | X                              | <0.2                                      |
| DKSS-1010S:2                                                | 2                 | 12/8/09           |             | X      |           | X                              | <0.2                                      |
| DKSS-1010W:2                                                | 2                 | 12/8/09           |             | X      |           | X                              | <0.2                                      |
| DKSS-1011:24                                                | 24                | 12/5/09           |             | X      |           | X                              | 0.30                                      |
| MTCA Method A Soil Cleanup Level for Unrestricted Land Uses |                   |                   |             |        |           |                                | 2.0                                       |

Note: ".5" denotes field duplicate sample.



Table DKMS-3 (cont.)  
Performance Sample Analytical Results - Mercury  
Deer Island/Kalama #2 Meter Station  
VCP Project No.:SW1201

| Sample Designation                                          | Depth (inches) | Date Collected | Sample Type |        |           | Final Performance Sample | Total Mercury Concentration (mg/kg) |
|-------------------------------------------------------------|----------------|----------------|-------------|--------|-----------|--------------------------|-------------------------------------|
|                                                             |                |                | Sidewall    | Bottom | Duplicate |                          |                                     |
| DKSS-1019/1119:6                                            | 6              | 12/5/09        | X           |        |           | X                        | <0.2                                |
| DKSS-1020/1119:18                                           | 18             | 12/5/09        | X           |        |           | X                        | <0.2                                |
| DKSS-1020:12                                                | 12             | 12/5/09        |             | X      |           | X                        | <0.2                                |
| DKSS-1021/1121:12                                           | 12             | 12/5/09        | X           |        |           | X                        | <0.2                                |
| DKSS-1108/1109:18                                           | 18             | 12/4/09        | X           |        |           | X                        | 0.038                               |
| DKSS-1109:12                                                | 12             | 12/4/09        |             | X      |           | X                        | 0.17                                |
| DKSS-1110:24                                                | 24             | 12/5/09        |             | X      |           | X                        | <0.2                                |
| DKSS-1111/1211:12                                           | 12             | 12/8/09        | X           |        |           | X                        | <0.2                                |
| DKSS-1111/1211:12.5                                         | 12             | 12/8/09        | X           |        | X         | X                        | <0.2                                |
| DKSS-1120:24                                                | 24             | 12/5/09        |             | X      |           | X                        | <0.2                                |
| DKSS-1210:24                                                | 24             | 12/8/09        |             | X      |           | X                        | <0.2                                |
| DKSS-1212/1312:12                                           | 12             | 12/8/09        | X           |        |           | X                        | 0.24                                |
| DKSS-1219/1220:12                                           | 12             | 12/5/09        | X           |        |           | X                        | <0.2                                |
| DKSS-1308/1408:18                                           | 18             | 12/8/09        | X           |        |           | X                        | <0.2                                |
| DKSS-1309:24                                                | 24             | 12/8/09        |             | X      |           | Excavated                | 5.3                                 |
| DKSS-1309:36                                                | 36             | 12/10/09       |             | X      |           | X                        | <0.2                                |
| DKSS-1310:24                                                | 24             | 12/8/09        |             | X      |           | Excavated                | 4.6                                 |
| DKSS-1310:36                                                | 36             | 12/10/09       |             | X      |           | X                        | <0.2                                |
| DKSS-1311:24                                                | 24             | 12/10/09       |             | X      |           | X                        | <0.2                                |
| DKSS-1313/1314:6                                            | 6              | 12/8/09        | X           |        |           | X                        | <0.2                                |
| DKSS-1406/1407:6                                            | 6              | 12/10/09       | X           |        |           | X                        | <0.2                                |
| DKSS-1409:12                                                | 12             | 12/8/09        |             | X      |           | X                        | 0.34                                |
| DKSS-1410/1510:12                                           | 12             | 12/10/09       | X           |        |           | X                        | <0.2                                |
| DKSS-1411:24                                                | 24             | 12/10/09       |             | X      |           | X                        | 0.20                                |
| DKSS-1412:24                                                | 24             | 12/10/09       |             | X      |           | X                        | <0.2                                |
| DKSS-1413/1512:18                                           | 18             | 12/10/09       | X           |        |           | X                        | <0.2                                |
| DKSS-1413:12                                                | 12             | 12/8/09        |             | X      |           | X                        | <0.2                                |
| DKSS-1414/1514:6                                            | 6              | 12/10/09       | X           |        |           | X                        | <0.2                                |
| DKSS-1508/1509:6                                            | 6              | 12/8/09        | X           |        |           | X                        | <0.2                                |
| DKSS-1508/1509:6.5                                          | 6              | 12/8/09        | X           |        | X         | X                        | <0.2                                |
| DKSS-1509/1608:6                                            | 6              | 12/10/09       | X           |        |           | X                        | <0.2                                |
| DKSS-1513:12                                                | 12             | 12/10/09       |             | X      |           | X                        | <0.2                                |
| MTCA Method A Soil Cleanup Level for Unrestricted Land Uses |                |                |             |        |           |                          | 2.0                                 |

Note: ".5" denotes field duplicate sample.



Table DKMS-3 (cont.)  
Performance Sample Analytical Results - Mercury  
Deer Island/Kalama #2 Meter Station  
VCP Project No.:SW1201

| Sample Designation                                          | Depth<br>(inches) | Date<br>Collected | Sample Type |        |           | Final<br>Performance<br>Sample | Total Mercury<br>Concentration<br>(mg/kg) |
|-------------------------------------------------------------|-------------------|-------------------|-------------|--------|-----------|--------------------------------|-------------------------------------------|
|                                                             |                   |                   | Sidewall    | Bottom | Duplicate |                                |                                           |
| DKSS-1608/1707:12                                           | 12                | 12/10/09          | X           |        |           | X                              | <0.2                                      |
| DKSS-1609/1709:18                                           | 18                | 12/10/09          | X           |        |           | X                              | <0.2                                      |
| DKSS-1609:12                                                | 12                | 12/10/09          |             | X      |           | X                              | <0.2                                      |
| DKSS-1610:12                                                | 12                | 12/10/09          |             | X      |           | X                              | <0.2                                      |
| DKSS-1612:12                                                | 12                | 12/10/09          |             | X      |           | X                              | 0.24                                      |
| DKSS-1708:24                                                | 24                | 12/10/09          |             | X      |           | X                              | 0.29                                      |
| DKSS-1710/1809:6                                            | 6                 | 12/10/09          | X           |        |           | X                              | <0.2                                      |
| DKSS-1711:12                                                | 12                | 12/10/09          |             | X      |           | X                              | <0.2                                      |
| DKSS-1712/1811:6                                            | 6                 | 12/10/09          | X           |        |           | X                              | <0.2                                      |
| DKSS-1712/1811:6.5                                          | 6                 | 12/10/09          | X           |        | X         | X                              | 0.92                                      |
| DKSS-1807/1808:12                                           | 12                | 12/10/09          | X           |        |           | X                              | <0.2                                      |
| DKSS-1810:12                                                | 12                | 12/10/09          |             | X      |           | X                              | <0.2                                      |
| DKSS-1908/2008:6                                            | 6                 | 12/10/09          | X           |        |           | X                              | <0.2                                      |
| DKSS-1908/2008:6.5                                          | 6                 | 12/10/09          | X           |        | X         | X                              | <0.2                                      |
| DKSS-1909:12                                                | 12                | 12/10/09          |             | X      |           | X                              | <0.2                                      |
| DKSS-1910/2009:6                                            | 6                 | 12/10/09          | X           |        |           | X                              | <0.2                                      |
| DKSS-ORM1/0921:6                                            | 6                 | 12/5/09           | X           |        |           | X                              | <0.2                                      |
| MTCA Method A Soil Cleanup Level for Unrestricted Land Uses |                   |                   |             |        |           |                                | 2.0                                       |

Note: ".5" denotes field duplicate sample.



**VCP Project No.:SW1201**

## CUL Based on TEE

