STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

In the Matter of Remedial Action by:

AGREED ORDER for

ExxonMobil Oil Corporation and American Distributing Company

Focused Feasibility Study and Draft Cleanup Action Plan – ExxonMobil ADC Site

No. DE **6184**

TO: ExxonMobil Oil Corporation 1001 Wampanoag Trail Riverside, RI 02915

and

American Distributing Company 13618 45th Avenue NE Marysville, WA 98271

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I. INTRODUCTION

The mutual objective of the State of Washington, Department of Ecology (Ecology), the ExxonMobil Oil Corporation (ExxonMobil), and the American Distributing Company (ADC) under this Agreed Order (Order) is to provide for remedial action at a facility where there has been a release or threatened release of hazardous substances. This Order requires ExxonMobil and ADC to conduct a supplemental Remedial Investigation and Feasibility Study (RI/FS) per WAC 173-340-350, and develop a draft Cleanup Action Plan per WAC 173-340-350 through 173-340-380 to address upland (soil and groundwater) contamination for the Site (see definition of Site in IV.A below). The supplemental RI/FS will be referred to as a Focused Feasibility Study (FFS) in this Order to indicate that additional data will be gathered to determine the nature and extent of site soil and groundwater contamination, and the FS will evaluate a focused set of remedial alternatives. This Order supersedes and incorporates all remaining obligations under the 1998 Agreed Order (DE98TCP-N223) made between Ecology, ExxonMobil, Mr. A.P. Miller (Miller), and ADC as described in Section V.M and included under Section VII.A.1 of this Order. Ecology believes the actions required by this Order are in the public interest.

II. JURISDICTION

This Agreed Order is issued pursuant to the Model Toxics Control Act (MTCA), RCW 70.105D.050(1).

III. PARTIES BOUND

This Agreed Order shall apply to and be binding upon the Parties to this Order, their successors and assigns. The undersigned representative of each party hereby certifies that he or she is fully authorized to enter into this Order and to execute and legally bind such party to comply with this Order. ExxonMobil and ADC agree to undertake all actions required by the terms and conditions of this Order. No change in ownership or corporate status shall alter ExxonMobil's and ADC's responsibility under this Order. ExxonMobil and ADC shall provide a copy of this Order to all agents, contractors, and subcontractors retained to perform work required by this Order, and shall ensure that all work undertaken by such agents, contractors, and subcontractors complies with this Order.

IV. DEFINITIONS

Unless otherwise specified herein, the definitions set forth in Chapter 70.105D RCW and Chapter 173-340 WAC shall control the meanings of the terms in this Order.

- A. <u>Site</u>: The Site is referred to as the ExxonMobil ADC Site and is generally located at 2717 and 2731 Federal Avenue, Everett, Snohomish County, Washington. The Site consists of both the ExxonMobil and the Miller (on which ADC operated) properties which, when combined, are approximately 0.86 acre in size (according to tax records). The Site is defined by the extent of contamination caused by the release of hazardous substances at the Site and is not limited by property boundaries. The Site includes areas where hazardous substances have been deposited, stored, disposed of, placed, or otherwise come to be located (extending both vertically and laterally). The final limits of the Site will be determined in the FFS. The Site is more particularly described in **Exhibit A** to this Order, which includes general site maps (**Exhibit A**, Figures 1 to 6), a site location description, and information from the Snohomish County Assessor's Office. The Site constitutes a Facility under RCW 70.105D.020(5).
- B. <u>Parties</u>: Refers to the State of Washington, Department of Ecology, ExxonMobil, and ADC.
 - C. Potentially Liable Persons (PLPs): Refers to ExxonMobil and ADC.
- D. <u>Agreed Order or Order</u>: Refers to this Order and each of the exhibits to the Order. All exhibits are integral and enforceable parts of this Order. The terms "Agreed Order" or "Order" shall include all exhibits to this Order.
- E. <u>1996 Order</u>: Refers to Agreed Order No. DE 95TC-N402, entered into in 1996 by Ecology, Mobil Oil Corporation, ADC, and Miller.
- F. <u>1998 Order</u>: Refers to Agreed Order No. DE 98TCP-N223, entered into in 1998 by Ecology, Mobil Oil Corporation, ADC, and Miller.
- G. <u>Miller Property</u>: The term "Miller Property" means lots 1 through 9 and part of lot 10 of Block 619, Plat of Everett, Division C, Everett, Washington, also known as 2717 Federal Avenue in Everett, Snohomish County, Washington. See Figure 3 in **Exhibit A**.

H. <u>ExxonMobil Property</u>: The term "ExxonMobil Property" means lots 11 through 14 and part of lot 10 of Block 619, Plat of Everett, Division C, Everett, Washington, also known as 2731 Federal Avenue in Everett, Snohomish County, Washington. <u>See</u> Figure 3 in **Exhibit A**.

V. FINDINGS OF FACT

Ecology makes the following findings of fact, without any express or implied admissions of such facts by the PLPs:

- A. ExxonMobil Corporation was formed in 1999 by the merger of two major oil companies, Exxon and the Mobil Oil Corporation. The Mobil Oil Corporation ("Mobil") is the successor to Socony-Mobil Oil Company, Inc., a New York corporation, which merged in or about 1959 with General Petroleum of Delaware, the successor to General Petroleum of California. General Petroleum of California leased the ExxonMobil and Miller properties from the Great Northern Railway of Minnesota from 1922 until 1927.
- B. Mobil and its predecessors owned and operated a bulk petroleum plant previously located on lots 1 through 14 of Block 619, Plat of Everett, Division C, Everett, Washington, from 1927 to 1974. The operations of Mobil and its predecessors included storing and distributing petroleum products at the Site from 1927 to 1974.
- C. In 1974, Mobil sold to Miller lots 1 through 9 and part of lot 10 of Block 619, Plat of Everett, Division C, Everett, Washington, for use by ADC.
- D. ADC operated those sections of the petroleum bulk plant previously located on lots 1 through 9 and part of lot 10 of Block 619, Plat of Everett, Division C, Everett, Washington, from 1974 until 1990. The operations of ADC included receiving, storing and distributing bulk petroleum heating fuels at the Miller Property. The ADC plant ceased bulk petroleum operations in 1990.
- E. After selling lots 1 through 9 and part of lot 10 to Miller in 1974, Mobil continued to own and operate a bulk petroleum distribution plant (from 1974 until 1987) at the ExxonMobil Property. Mobil's operations included receiving, storing and distributing petroleum products at the ExxonMobil Property. The Mobil plant ceased petroleum bulk operations in 1987.

- F. ExxonMobil currently owns or formerly operated lots 11 through 14 and part of lot 10 of Block 619, Plat of Everett, Division C, Everett, Washington. See Exhibit A.
- G. ADC currently owns or formerly operated lots 1 through 9 and part of lot 10 of Block 619, Plat of Everett, Division C, Everett, Washington. See Exhibit A.
- H. Multiple environmental investigations and remedial actions have been conducted at the Site beginning in 1985. To date, over 100 individual soil borings, 8 test pits, and over 40 monitoring wells have been completed at the Site and surrounding areas. The most recent investigation, which involved the installation of two groundwater wells and the collection of groundwater and soil samples, was conducted in 2007 to document subsurface soil conditions and groundwater quality on the western side of Federal Avenue. Investigation results have found the following contaminants above MTCA cleanup levels in both soil and groundwater at the Site: diesel-, oil-, and gasoline-range total petroleum hydrocarbons (TPH), carcinogenic polycyclic aromatic hydrocarbons (cPAHs), lead, benzene, and xylenes. In addition, ethylbenzene has been found to be present above MTCA cleanup levels in soil. Additional information pertaining to the aforementioned environmental investigations at the Site is contained in the FFS Work Plan.
- I. Liquid phase petroleum hydrocarbons (LPH) have been identified in both soil and groundwater at the Site. LPH typing analysis has indicated that the LPH characteristics are similar to several petroleum products. The LPH identified at the Site is more specifically characterized as Light Non-Aqueous Phase Liquid (LNAPL) petroleum hydrocarbons. Interim remedial actions began at the Property in 1988 with the installation of an LNAPL recovery gallery. Subsequent interim remedial actions and testing included groundwater extraction and treatment, test pit and recovery trench installation, soil vapor extraction, manual LNAPL recovery, LNAPL vacuum recovery, and excavation dewatering. LNAPL gauging and recovery, which commenced in 2002, continues to the present time (using passive recovery methods) and consists of the following activities conducted on a monthly basis: water level gauging of Site monitoring wells, LNAPL removal from select monitoring wells, and replacement of oleophilic socks in wells with LNAPL accumulations. Additional information pertaining to remedial activities at the Site is contained in the FFS Work Plan.

- J. Periodic groundwater monitoring (i.e., collection of groundwater samples for analysis) began at the Site in the early 1990s. Regular quarterly groundwater monitoring commenced in 2002. In 2007, the groundwater monitoring frequency for the Site was reduced from quarterly to semi-annually. Wells sampled during groundwater monitoring events are analyzed for the following constituents: diesel-, oil-, and gasoline-range TPH, benzene, ethylbenzene, toluene, and total xylenes. Information from the latest round of groundwater monitoring activities (from August 2008) is contained in the FFS Work Plan.
- K. In April 1996, Ecology entered into the 1996 Order with Mobil Oil Corporation, ADC, and Miller requiring the cleanup and elimination and/or containment of petroleum releases at and near the City of Everett's combined sewer overflow (CSO) discharge line into Port Gardner Bay. The CSO line is depicted in **Exhibit A**, Figures 2, 4, 5, and 6. The releases were related to a severely corroded and collapsed section of the CSO line approximately 400 feet from Port Gardner Bay. Mobil Oil, ADC, and Miller agreed to perform corrective action work, including replacing the collapsed CSO section, sliplining another CSO section (to prevent leakage of petroleum through the CSO), and cleanup of rip rap, sheetpile seawall, and pilings and docks near the discharge to Port Gardner Bay. The 1996 Order also required pilot testing of LPH recovery technologies and characterization of the areal and vertical distribution and concentration of the free-phase waste petroleum liquid and groundwater contamination. Between June 1996 and January 1997, approximately 23,000 gallons of LPH were recovered. As result of the work performed under the 1996 Order, direct discharge of petroleum into Port Gardner bay via the CSO was eliminated. Ecology acknowledged that the interim containment measures and CSO repair and cleanup were satisfactorily completed with no evidence of on-going releases of heavy oil. Ecology and the PLPs agreed that additional characterization was needed to fully describe the nature and extent of the contamination in the vicinity of the Site.
- L. In October 1998, Ecology, Mobil Oil Corporation, ADC, and Miller entered into the 1998 Order which required the preparation of a Remedial Investigation/Focused Feasibility Study Report ("RI/FFS Report"), an Interim Action Work Plan, and the subsequent implementation and performance of the work described in the Interim Action Work Plan. As part

of the RI/FFS, environmental conditions at the Site were reviewed (analytical data from 1988 to 1996 were compiled and evaluated) and remedial options were evaluated. Based on the results of the RI/FFS, the PLPs prepared and implemented an Interim Action Work Plan. The following interim remedial actions were performed:

- 1. **Demolition of site structures**. Structures that were demolished on the Site included buildings, piping, loading racks, the firewall and the northeast corner of the firewall's foundation, and the above ground storage tank pad.
- **2. Monitoring well abandonment**. A total of 22 groundwater monitoring wells were abandoned in 1998. In addition, three wells were abandoned and then reinstalled in 1999.
- **3.** Construction of interceptor trench. An interceptor trench was constructed along the western and northern Site boundaries.
- **4. Construction of site cover.** The site cover was designed to minimize the potential for infiltration of surface water into subsurface soil. In addition to an asphalt cap, a storm water collection system was included in the design for the cover.
- **5. Water management**. The water management and treatment system was constructed in December 1998. Between December 1998 and September 1999, the system treated approximately 2.5 million gallons of water from the Site.

The above remediation activities commenced in November 1998 and ended in January 2000. As a result of the RI/FFS and subsequent interim remedial actions conducted at the Site, the ExxonMobil and Miller properties were converted into a parking lot for Kimberly-Clark employees. This redevelopment option was selected to allow for possible future remediation activities at the Site. Additional information pertaining to the RI/FFS and interim remedial actions performed at the Site as part of the 1998 Order are contained in the FFS Work Plan.

M. Ecology stated in a March 23, 2000 letter to ExxonMobil and ADC that the construction portion of the interim remedial action at this site has been satisfactorily completed per the 1998 Order. Ecology also stated that as a continued requirement under the 1998 Order, groundwater monitoring and LPH recovery activities must continue at the Site as specified in Appendix G of the February 2000 Closure Report. ExxonMobil and ADC submitted quarterly and annual reports to Ecology.

VI. ECOLOGY DETERMINATIONS

Ecology makes the following determinations, without any express or implied admissions of such determinations by the PLPs.

- A. ExxonMobil is an "owner or operator" as defined in RCW 70.105D.020(17) of a "facility" as defined in RCW 70.105D.020(5).
- B. ADC is an "owner or operator" as defined in RCW 70.105D.020(17) of a "facility" as defined in RCW 70.105D.020(5).
- C. Based upon all factors known to Ecology, a "release" or "threatened release" of "hazardous substance(s)" as defined in RCW 70.105D.020(25) and RCW 70.105D.020(10), respectively, has occurred at the Site.
- D. Based upon credible evidence, Ecology issued PLP status letters to ADC, Mobil Oil Corporation, and Miller pursuant to RCW 70.105D.040, RCW 70.105D.020(21), and WAC 173-340-500. PLP status letters were sent to ADC and Mobil Oil Corporation on November 30, 1995. A PLP status letter was sent to Miller on December 1, 1995. After providing for notice and opportunity for comment, reviewing any comments submitted, and concluding that credible evidence supported a finding of potential liability, Ecology issued determinations that ADC, Mobil Oil Corporation, and Miller are PLPs under RCW 70.105D.040, and notified them of this determination by letter dated January 2, 1996.
- E. Pursuant to RCW 70.105D.030(1) and RCW 70.105D.050(1), Ecology may require PLPs to investigate or conduct other remedial actions with respect to any release or threatened release of hazardous substances, whenever it believes such action to be in the public interest. Based on the foregoing facts, Ecology believes the remedial actions required by this Order are in the public interest.

VII. WORK TO BE PERFORMED

Based on the Findings of Fact and Ecology Determinations, it is hereby ordered that the PLPs take the following remedial actions at the Site, as more fully described in the FFS Work Plan attached to this Order as **Exhibit B**, and that these actions are conducted in accordance with WAC 173-340 unless otherwise specifically provided for herein:

- A. The PLPs shall conduct the remedial actions fully described in **Exhibit B** to this Order. Generally, the PLPs shall perform the following:
 - 1. Continue on-going groundwater monitoring and LPH recovery activities at the Site.
 - 2. Implement the Work Plan for performing a Focused Feasibility Study (FFS) at the Site (FFS Work Plan) (**Exhibit B**).
 - 3. Perform an FFS.
 - 4. Prepare an FFS report.
 - 5. Develop a draft cleanup action plan (CAP) for the Site.
- B. The PLPs shall perform the remedial actions required by this Order according to the work schedule set forth in **Exhibit B**.
- C. If at any time after the first exchange of comments on drafts, Ecology determines that insufficient progress is being made in the preparation of any of the deliverables required under the FFS Work Plan (**Exhibit B**), Ecology may complete and issue the final deliverable.
- D. The PLPs shall submit to Ecology a progress report as required in the FFS Work Plan.

VIII. TERMS AND CONDITIONS OF ORDER

A. Public Notice

RCW 70.105D.030(2)(a) requires that, at a minimum, this Order be subject to concurrent public notice. Ecology shall be responsible for providing such public notice and reserves the right to modify or withdraw any provisions of this Order should public comment disclose facts or considerations which indicate to Ecology that this Order is inadequate or improper in any respect.

B. Remedial Action Costs

The PLPs shall pay to Ecology costs incurred by Ecology pursuant to this Order and consistent with WAC 173-340-550(2). These costs shall include work performed by Ecology or

order preparation, negotiation, oversight, and administration. These costs shall include work performed both prior to and subsequent to the issuance of this Order. Ecology's costs shall include costs of direct activities and support costs of direct activities as defined in WAC 173-340-550(2). The PLPs shall pay the required amount within ninety (90) days of receiving from Ecology an itemized statement of costs that includes a summary of costs incurred, an identification of involved staff, and the amount of time spent by involved staff members on the project. A general statement of work performed will be provided upon request. Itemized statements shall be prepared quarterly. Pursuant to WAC 173-340-550(4), failure to pay Ecology's costs within ninety (90) days of receipt of the itemized statement of costs will result in interest charges at the rate of twelve percent (12%) per annum, compounded monthly.

Pursuant to RCW 70.105D.055, Ecology has authority to recover unreimbursed remedial action costs by filing a lien against real property subject to the remedial actions.

C. Implementation of Remedial Action

If Ecology determines that the PLPs have failed without good cause to implement the remedial action, in whole or in part, Ecology may, after notice to the PLPs, perform any or all portions of the remedial action that remain incomplete. If Ecology performs all or portions of the remedial action because of the PLPs' failure to comply with its obligations under this Order, the PLPs shall reimburse Ecology for the costs of doing such work in accordance with Section VIII.B (Remedial Action Costs), provided that the PLPs are not obligated under this Section to reimburse Ecology for costs incurred for work inconsistent with or beyond the scope of this Order.

Except where necessary to abate an emergency situation, the PLPs shall not perform any remedial actions at the Site outside those remedial actions required by this Order, unless Ecology concurs, in writing, with such additional remedial actions.

D. Designated Project Coordinators

The project coordinator for Ecology is: Andy Kallus

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Toxics Cleanup Program

PO Box 47600, Olympia, Washington 98504

Phone: 360-407-7259

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The project coordinators for the PLP Group are:

Joseph Abel ExxonMobil

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Riverside, Rhode Island 02915

Phone: 401-434-7356

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Gary Dupuy AMEC Geomatrix 600 University, Suite 1020 Seattle, WA 98101

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Each project coordinator shall be responsible for overseeing the implementation of this Order. Ecology's project coordinator will be Ecology's designated representative for the Site. To the maximum extent possible, communications between Ecology and the PLPs, and all documents, including reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order shall be directed through the project coordinators. The project coordinators may designate, in writing, working level staff contacts for all or portions of the implementation of the work to be performed required by this Decree.

Any party may change its respective project coordinator. Written notification shall be given to the other party at least ten (10) calendar days prior to the change.

E. Performance

All geologic and hydrogeologic work performed pursuant to this Order shall be under the supervision and direction of a geologist licensed in the State of Washington or under the direct supervision of an engineer registered in the State of Washington, except as otherwise provided for by Chapters 18.220 and 18.43 RCW.

All engineering work performed pursuant to this Order shall be under the direct supervision of a professional engineer registered in the State of Washington, except as otherwise provided for by RCW 18.43.130.

All construction work performed pursuant to this Order shall be under the direct supervision of a professional engineer or a qualified technician under the direct supervision of a professional engineer. The professional engineer must be registered in the State of Washington, except as otherwise provided for by RCW 18.43.130.

Any documents submitted containing geologic, hydrologic or engineering work shall be under the seal of an appropriately licensed professional as required by Chapter 18.220 RCW or RCW 18.43.130.

The PLPs shall notify Ecology in writing of the identity of any engineer(s) and geologist(s), contractor(s) and subcontractor(s), and others to be used in carrying out the terms of this Order, in advance of their involvement at the Site.

F. Access

Ecology or any Ecology authorized representative shall have the full authority to enter and freely move about all property at the Site that the PLPs either owns, controls, or has access rights to at all reasonable times for the purposes of, *inter alia*: inspecting records, operation logs, and contracts related to the work being performed pursuant to this Order; reviewing the PLPs' progress in carrying out the terms of this Order; conducting such tests or collecting such samples as Ecology may deem necessary; using a camera, sound recording, or other documentary type equipment to record work done pursuant to this Order; and verifying the data submitted to Ecology by the PLPs. The PLPs shall make all reasonable efforts to secure access rights for those properties within the Site not owned or controlled by the PLPs where remedial activities or investigations will be performed pursuant to this Order. Ecology or any Ecology authorized representative shall give reasonable notice before entering any Site property owned or controlled by the PLPs unless an emergency prevents such notice. All persons who access the Site pursuant to this Section shall comply with any applicable Health and Safety Plan(s). Ecology employees and their representatives shall not be required to sign any liability release or waiver as a condition of Site property access.

G. Sampling, Data Submittal, and Availability

With respect to the implementation of this Order, the PLPs shall make the results of all sampling, laboratory reports, and/or test results generated by it or on its behalf available to Ecology. Pursuant to WAC 173-340-840(5), all sampling data shall be submitted to Ecology in both printed and electronic formats in accordance with Section VII (Work to be Performed), Ecology's Toxics Cleanup Program Policy 840 (Data Submittal Requirements), and/or any subsequent procedures specified by Ecology for data submittal. **Exhibit C** contains Ecology Policy 840 (Data Submittal Requirements).

If requested by Ecology, the PLPs shall allow Ecology and/or its authorized representative to take split or duplicate samples of any samples collected by the PLPs pursuant to implementation of this Order. The PLPs shall notify Ecology seven (7) days in advance of any sample collection or work activity at the Site. Ecology shall, upon request, allow the PLPs and/or its authorized representative to take split or duplicate samples of any samples collected by Ecology pursuant to the implementation of this Order, provided that doing so does not interfere with Ecology's sampling. Without limitation on Ecology's rights under Section VIII.F (Access), Ecology shall notify the PLPs prior to any sample collection activity unless an emergency prevents such notice.

In accordance with WAC 173-340-830(2)(a), all hazardous substance analyses shall be conducted by a laboratory accredited under Chapter 173-50 WAC for the specific analyses to be conducted, unless otherwise approved by Ecology.

H. Public Participation

A Public Participation Plan (see WAC 173-340-600) that is required for this Site, has been developed and is included as **Exhibit D**. Ecology shall maintain the responsibility for public participation at the Site. However, the PLPs shall cooperate with Ecology, and shall:

1. If agreed to by Ecology, develop appropriate mailing list, prepare drafts of public notices and fact sheets at important stages of the remedial action, such as the submission of work plans, remedial investigation/feasibility study reports, cleanup action plans, and engineering

design reports. As appropriate, Ecology will edit, finalize, and distribute such fact sheets and prepare and distribute public notices of Ecology's presentations and meetings.

- 2. Notify Ecology's project coordinator prior to the preparation of all press releases and fact sheets, and before major meetings with the interested public and local governments. Likewise, Ecology shall notify the PLPs prior to the issuance of all press releases and fact sheets, and before major meetings with the interested public and local governments. For all press releases, fact sheets, meetings, and other outreach efforts by the PLPs that do not receive prior Ecology approval, the PLPs shall clearly indicate to its audience that the press release, fact sheet, meeting, or other outreach effort was not sponsored or endorsed by Ecology.
- 3. When requested by Ecology, participate in public presentations on the progress of the remedial action at the Site. Participation may be through attendance at public meetings to assist in answering questions or as a presenter.
- 4. When requested by Ecology, arrange and/or continue information repositories to be located at the following locations:
 - a. Everett Public Library 2702 Hoyt Ave Everett, WA 98201
 - b. Department of Ecology
 Toxics Cleanup Program
 Headquarters Office
 300 Desmond Drive SE
 Olympia, Washington 98503

At a minimum, copies of all public notices, fact sheets, and press releases; all quality assured monitoring data; remedial action plans and reports, supplemental remedial planning documents, and all other similar documents relating to performance of the remedial action required by this Order shall be promptly placed in these repositories.

I. Retention of Records

During the pendency of this Order, and for ten (10) years from the date of completion of work performed pursuant to this Order, the PLPs shall preserve all records, reports, documents, and underlying data in its possession relevant to the implementation of this Order and shall insert

a similar record retention requirement into all contracts with project contractors and subcontractors. Upon request of Ecology, the PLPs shall make all records available to Ecology and allow access for review within a reasonable time. PLPs do not waive any right they may have under applicable law to limit disclosure of documents protected by the attorney work-product privilege and/or the attorney-client privilege. If PLPs withhold any requested records based on an assertion of privilege, they shall provide Ecology with a privilege log specifying the records withheld and the applicable privilege. No actual data collected on Site pursuant to this Order shall be considered privileged.

J. Resolution of Disputes

- 1. In the event a dispute arises as to an approval, disapproval, proposed change, or other decision or action by Ecology's project coordinator, or an itemized billing statement under Section VIII.B (Remedial Action Costs), the Parties shall utilize the dispute resolution procedure set forth below.
 - a. Upon receipt of Ecology's project coordinator's written decision or the itemized billing statement, the PLPs has fourteen (14) days within which to notify Ecology's project coordinator in writing of its objection to the decision or itemized statement and seven (7) days thereafter to provide Ecology specific reasons for its objection.
 - b. The Parties' project coordinators shall then confer in an effort to resolve the dispute. If the project coordinators cannot resolve the dispute within twenty-one (21) days, Ecology's project coordinator shall issue a written decision responding to the PLPs' objection.
 - c. The PLPs may then request regional management review of the decision. This request shall be submitted in writing to the Headquarters Land and Aquatic Lands Cleanup Section Manager within fourteen (14) days of receipt of Ecology's project coordinator's written decision.
 - d. The Section Manager shall conduct a review of the dispute and shall endeavor to issue a written decision regarding the dispute within thirty (30) days of a

PLP's request for review. The Section Manager's decision shall be Ecology's final decision on the disputed matter.

- 2. The Parties agree to only utilize the dispute resolution process in good faith and agree to expedite, to the extent possible, the dispute resolution process whenever it is used.
- Implementation of these dispute resolution procedures shall not provide a basis for delay of any activities required in this Order, unless Ecology agrees in writing to a schedule extension.

K. Extension of Schedule

- 1. An extension of schedule shall be granted only when a request for an extension is submitted in a timely fashion, generally at least thirty (30) days prior to expiration of the deadline for which the extension is requested, and good cause exists for granting the extension. All extensions shall be requested in writing. The request shall specify:
 - a. The deadline that is sought to be extended;
 - b. The length of the extension sought;
 - c. The reason(s) for the extension; and
 - d. Any related deadline or schedule that would be affected if the extension were granted.
- 2. The burden shall be on the PLP to demonstrate to the satisfaction of Ecology that the request for such extension has been submitted in a timely fashion and that good cause exists for granting the extension. Good cause may include, but may not be limited to:
 - a. Circumstances beyond the reasonable control and despite the due diligence of a PLP including delays caused by unrelated third parties or Ecology, such as (but not limited to) delays by Ecology in reviewing, approving, or modifying documents submitted by the PLP;
 - b. Acts of God, including fire, flood, blizzard, extreme temperatures, storm, or other unavoidable casualty; or
 - c. Endangerment as described in Section VIII.M (Endangerment).

However, neither increased costs of performance of the terms of this Order nor changed economic circumstances shall be considered circumstances beyond the reasonable control of the PLPs.

- 3. Ecology shall act upon any written request for extension in a timely fashion. Ecology shall give the PLPs written notification of any extensions granted pursuant to this Order. A requested extension shall not be effective until approved by Ecology. Unless the extension is a substantial change, it shall not be necessary to amend this Order pursuant to Section VIII.L (Amendment of Order) when a schedule extension is granted.
- 4. An extension shall only be granted for such period of time as Ecology determines is reasonable under the circumstances. Ecology may grant schedule extensions exceeding ninety (90) days only as a result of:
 - a. Delays in the issuance of a necessary permit which was applied for in a timely manner;
 - b. Other circumstances deemed exceptional or extraordinary by Ecology; or
 - c. Endangerment as described in Section VIII.M (Endangerment).
- 5. Ecology may extend the period for reviewing and commenting on a document (as specified in **Exhibit B**) by providing oral or written notification to the PLPs, prior to expiration of the comment period. Ecology will provide an estimate of the time required for completion of its review. Ecology will provide an extension of schedule for the PLPs' submission of deliverables that corresponds to the extended period for its review of a document.

L. Amendment of Order

The project coordinators may verbally agree to minor changes to the work to be performed without formally amending this Order. Minor changes will be documented in writing by Ecology within seven (7) days of verbal agreement.

Except as provided in Section VIII.N (Reservation of Rights), substantial changes to the work to be performed shall require formal amendment of this Order. This Order may only be formally amended by the written consent of both Ecology and the PLPs. The PLPs shall submit a written request for amendment to Ecology for approval. Ecology shall indicate its approval or

disapproval in writing and in a timely manner after the written request for amendment is received. If the amendment to this Order represents a substantial change, Ecology will provide public notice and opportunity to comment. Reasons for the disapproval of a proposed amendment to this Order shall be stated in writing. If Ecology does not agree to a proposed amendment, the disagreement may be addressed through the dispute resolution procedures described in Section VIII.J (Resolution of Disputes).

M. Endangerment

In the event Ecology determines that any activity being performed at the Site is creating or has the potential to create a danger to human health or the environment on or surrounding the Site, Ecology may direct the PLPs to cease such activities for such period of time as it deems necessary to abate the danger. The PLPs shall immediately comply with such direction.

In the event a PLP determines that any activity being performed at the Site is creating or has the potential to create a danger to human health or the environment, the PLP may cease such activities. The PLPs shall notify Ecology's project coordinator as soon as possible, but no later than twenty-four (24) hours after making such determination or ceasing such activities. Upon Ecology's direction the PLPs shall provide Ecology with documentation of the basis for the determination or cessation of such activities. If Ecology disagrees with the PLP's cessation of activities, it may direct the PLPs to resume such activities.

If Ecology concurs with or orders a work stoppage pursuant to Section VIII.M (Endangerment), the PLPs' obligations with respect to the ceased activities shall be suspended until Ecology determines the danger is abated, and the time for performance of such activities, as well as the time for any other work dependent upon such activities, shall be extended in accordance with Section VIII.K (Extension of Schedule) for such period of time as Ecology determines is reasonable under the circumstances.

Nothing in this Order shall limit the authority of Ecology, its employees, agents, or contractors to take or require appropriate action in the event of an emergency.

N. Reservation of Rights

This Order is not a settlement under Chapter 70.105D RCW. Ecology's signature on this Order in no way constitutes a covenant not to sue or a compromise of any of Ecology's rights or authority. Ecology will not, however, bring an action against the PLPs to recover remedial action costs paid to and received by Ecology under this Order. In addition, Ecology will not take additional enforcement actions against the PLPs regarding remedial actions required by this Order, provided the PLPs comply with this Order.

Ecology nevertheless reserves its rights under Chapter 70.105D RCW, including the right to require additional or different remedial actions at the Site should it deem such actions necessary to protect human health and the environment, and to issue orders requiring such remedial actions. Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from the release or threatened release of hazardous substances at the Site.

O. Transfer of Interest in Property

No voluntary conveyance or relinquishment of title, easement, leasehold, or other interest in any portion of the Site shall be consummated by the PLPs without provision for continued implementation of all requirements of this Order and implementation of any remedial actions found to be necessary as a result of this Order.

Prior to either PLP's transfer of any interest in all or any portion of the Site, and during the effective period of this Order, the PLP shall provide a copy of this Order to any prospective purchaser, lessee, transferee, assignee, or other successor in said interest; and, at least thirty (30) days prior to any transfer, the PLP shall notify Ecology of said transfer. Upon transfer of any interest, the PLPs shall restrict uses and activities to those consistent with this Order and notify all transferees of the restrictions on the use of the property.

P. Compliance with Applicable Laws

1. All actions carried out by PLPs pursuant to this Order shall be done in accordance with all applicable federal, state, and local requirements (see WAC 173-340-710(2)), including requirements to obtain necessary permits, except as provided in RCW 70.105D.090. The permits

or specific federal, state or local requirements that Ecology has determined are applicable and that are known at the time of entry of this Order have been identified in **Exhibit B**.

2. Pursuant to RCW 70.105D.090(1), PLPs are exempt from the procedural requirements of Chapters 70.94, 70.95, 70.105, 77.55, 90.48, and 90.58 RCW and of any laws requiring or authorizing local government permits or approvals. However, PLPs shall comply with the substantive requirements of such permits or approvals. At this time, no state or local permits or approvals have been identified as being applicable but procedurally exempt under this Section.

Each PLP has a continuing obligation to determine whether additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order. In the event either Ecology or a PLP determines that additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order, it shall promptly notify the other party of its determination. Ecology shall determine whether Ecology or one or both of the PLPs shall be responsible to contact the appropriate state and/or local agencies. If Ecology so requires, PLPs shall promptly consult with the appropriate state and/or local agencies and provide Ecology with written documentation from those agencies of the substantive requirements those agencies believe are applicable to the remedial action. Ecology shall make the final determination on the additional substantive requirements that must be met by PLPs and on how PLPs must meet those requirements. Ecology shall inform PLPs in writing of these requirements. Once established by Ecology, the additional requirements shall be enforceable requirements of this Order. PLP s shall not begin or continue the remedial action potentially subject to the additional requirements until Ecology makes its final determination.

3. Pursuant to RCW 70.105D.090(2), in the event Ecology determines that the exemption from complying with the procedural requirements of the laws referenced in RCW 70.105D.090(1) would result in the loss of approval from a federal agency that is necessary for the State to administer any federal law, the exemption shall not apply and PLPs

shall comply with both the procedural and substantive requirements of the laws referenced in RCW 70.105D.090(1), including any requirements to obtain permits.

Q. Indemnification

Each individual PLP agrees to indemnify and save and hold the State of Washington, its employees, and agents harmless from any and all claims or causes of action for death or injuries to persons or for loss or damage to property to the extent arising from or on account of acts or omissions of such individual PLP, its officers, employees, agents, or contractors in entering into and implementing this Order. However, the PLPs shall not indemnify the State of Washington nor save nor hold its employees and agents harmless from any claims or causes of action to the extent arising out of the negligent acts or omissions of the State of Washington, or the employees or agents of the State, in entering into or implementing this Order.

IX. SATISFACTION OF ORDER

The provisions of this Order shall be deemed satisfied upon the PLPs' receipt of written notification from Ecology that the PLPs have completed the remedial activity required by this Order, as amended by any modifications, and that PLPs have complied with all other provisions of this Agreed Order.

X. ENFORCEMENT

Pursuant to RCW 70.105D.050, this Order may be enforced as follows:

- 1. The Attorney General may bring an action to enforce this Order in a state or federal court.
- 2. The Attorney General may seek, by filing an action, if necessary, to recover amounts spent by Ecology for investigative and remedial actions and orders related to the Site.
- 3. In the event a PLP refuses, without sufficient cause, to comply with any term of this Order, that PLP will be liable for:
 - a. Up to three (3) times the amount of any costs incurred by the State of Washington as a result of its refusal to comply; and
 - b. Civil penalties of up to twenty-five thousand dollars (\$25,000) per day for each day it refuses to comply.

Agreed Order No. DE 6184 Page 23 of 23

4. This Order is not appealable to the Washington Pollution Control Hearings Board.

This Order may be reviewed only as provided under RCW 70.105D.060.

Effective date of this Order: March 16, 2010

EXXONMOBIL OIL CORPORATION

STATE OF WASHINGTON, DEPARTMENT OF ECOLOGY

Kurt W. Fischer MICLABL W. SCHWEHR Global Area Manager - Major Projects ExxonMobil Oil Corporation 3225 Gallows Road Fairfax, VA 22037 (703) 846-5956

Agent and Attorney - in - Fact

Tim L. Nord
Section Manager
Toxics Cleanup Program
Land & Aquatic Lands Cleanup Section
Headquarters Office
300 Desmond Drive Southeast
Lacey, Washington 98503
(360) 407-7226

AMERICAN DISTRIBUTING COMPANY

Stephen P. Miller President of ADC 13618 45th Avenue NE Marysville, WA 98271 (360) 658-3751

Agreed Order No. DE 6184 Page 23 of 23

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EXXONMOBIL OIL CORPORATION

STATE OF WASHINGTON, DEPARTMENT OF ECOLOGY

Kurt W. Fischer Global Area Manager - Major Projects ExxonMobil Oil Corporation 3225 Gallows Road Fairfax, VA 22037 (703) 846-5956 Tim L. Nord
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(360) 407-7226

AMERICAN DISTRIBUTING COMPANY

Stephen P. Miller President of ADC

03.08,2010

13618 45th Avenue NE

Marysville, WA 98271 (360) 658-3751

EXHIBIT A

SITE LOCATION AND PROPERTY LOCATION INFORMATION

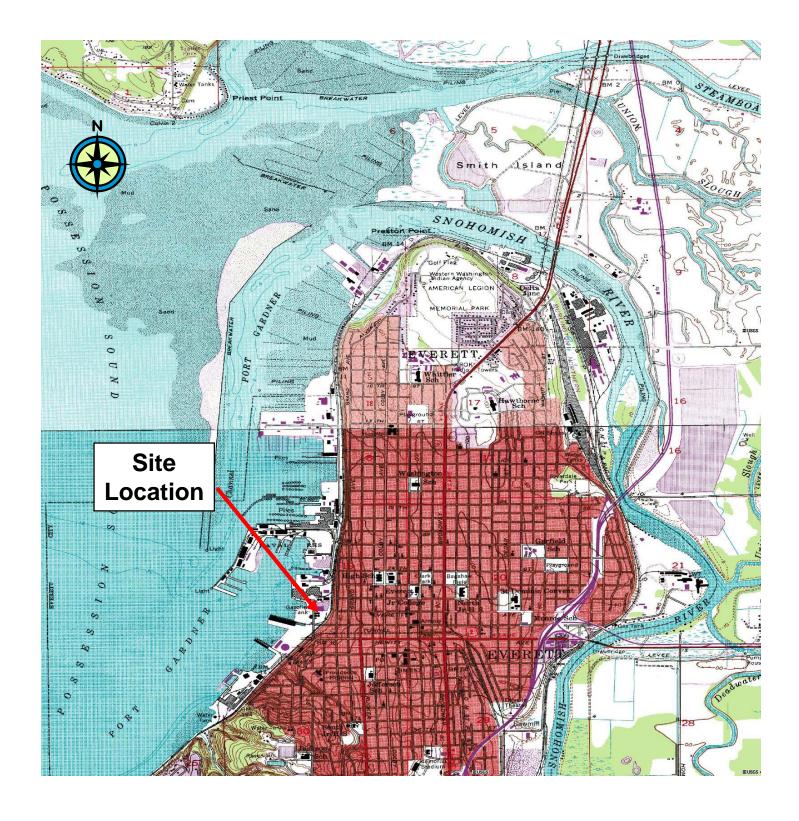
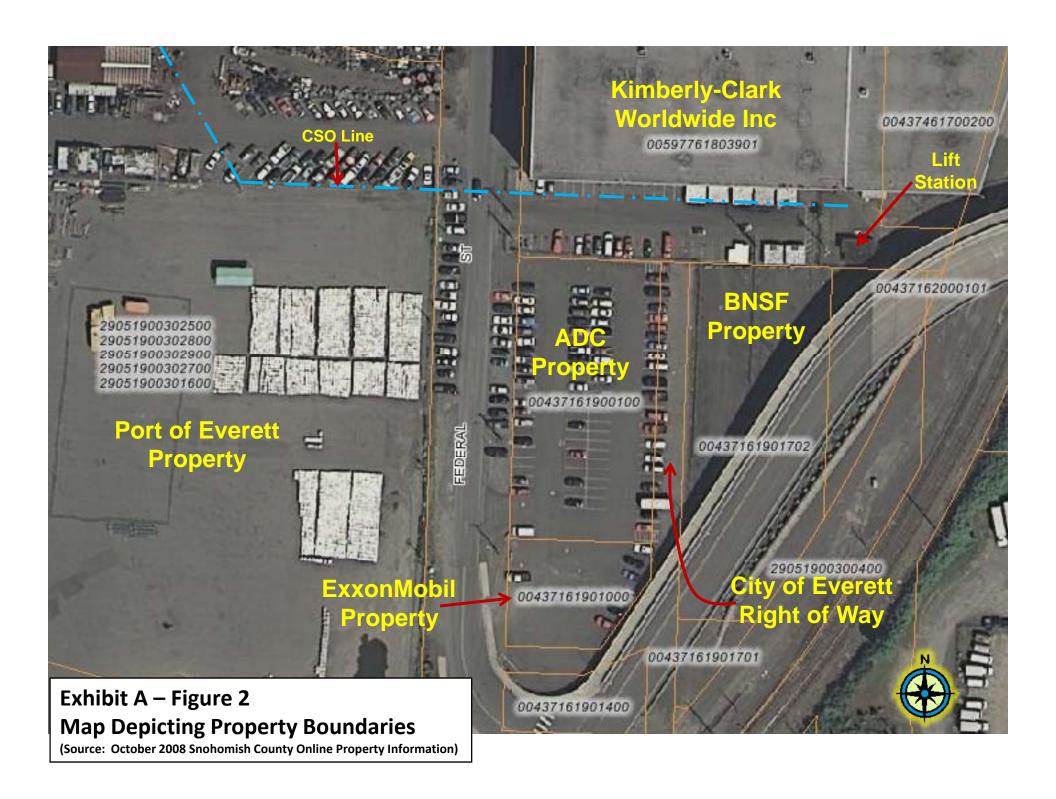


Exhibit A – Figure 1 Site Location Map

(Source: USGS 7.5 Minute Quadrangle Maps; Everett and Marysville Quadrangle Maps; Photo Revised – 1968 and 1973)







A product of the Snohomish County Assessor's Office Map produced on April 02, 2008 THIS IS NOT A SURVEY. IT IS A TAX PARCEL MAP USED FOR THE LOCATION OF PROPERTY ONLY. SNOHOMISH COUNTY DISCLAIMS ANY WARRANTY OF MERCHANTABILITY OR WARRANTY OF FITNESS OF THIS MAP FOR ANY PARTICULAR PURPOSE, EITHER EXPRESS OR IMPLIED. NO REPRESENTATION OR WARRANTY IS MADE CONCERNING THE ACCURACY, CURRENCY, COMPLETENESS OR QUALITY OF DATA DEPICTED ON THIS MAP. ANY USER OF THIS MAP ASSUMES ALL RESPONSIBILITY FOR USE THEREOF, AND FURTHER ACREES TO HOLD SNOHOMISH COUNTY HARMLESS FROM AND AGAINST ANY DAMAGE, LOSS OR LIABILITY ARISING FROM ANY USE OF THIS MAP, PERSONS SEEKING THE MOST CURRENT TAX PARCEL DATA SHOULD CONSULT THE OFFICIAL DATABASE ON FILE WITH THE SNOHOMISH COUNTY ASSESSOR.

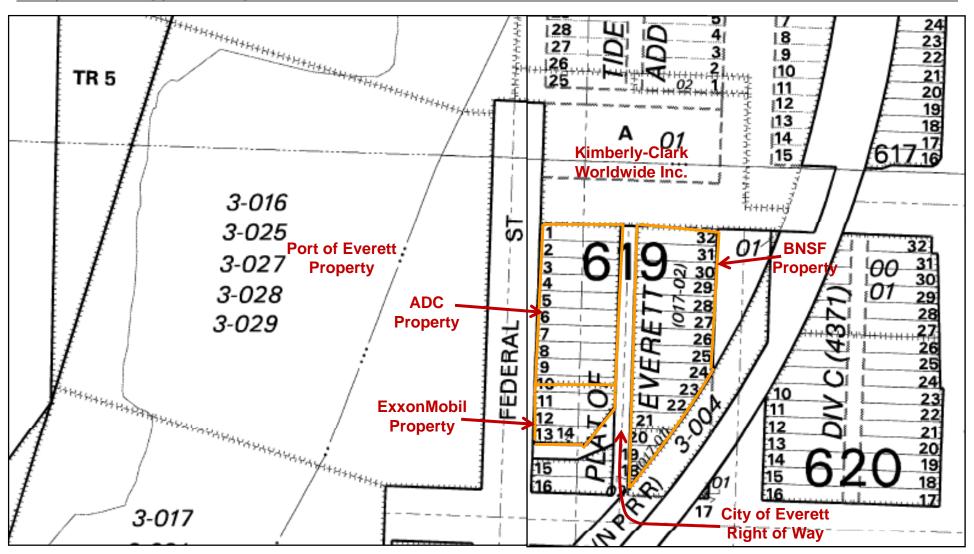
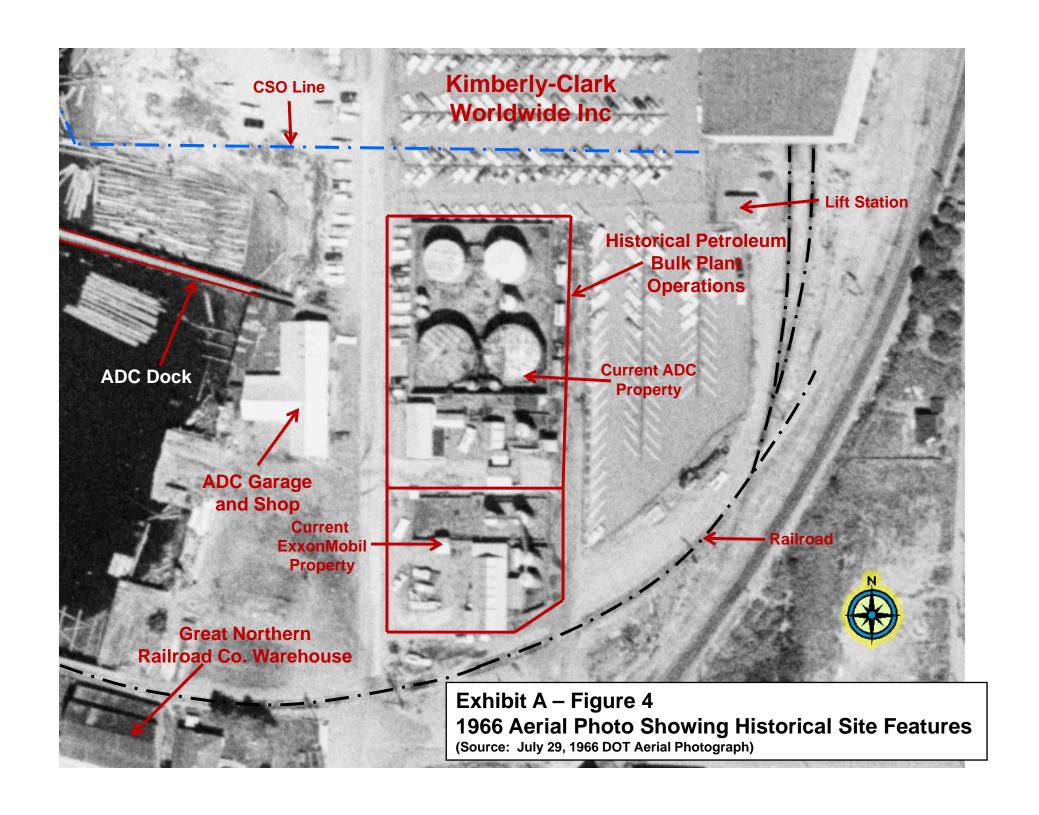
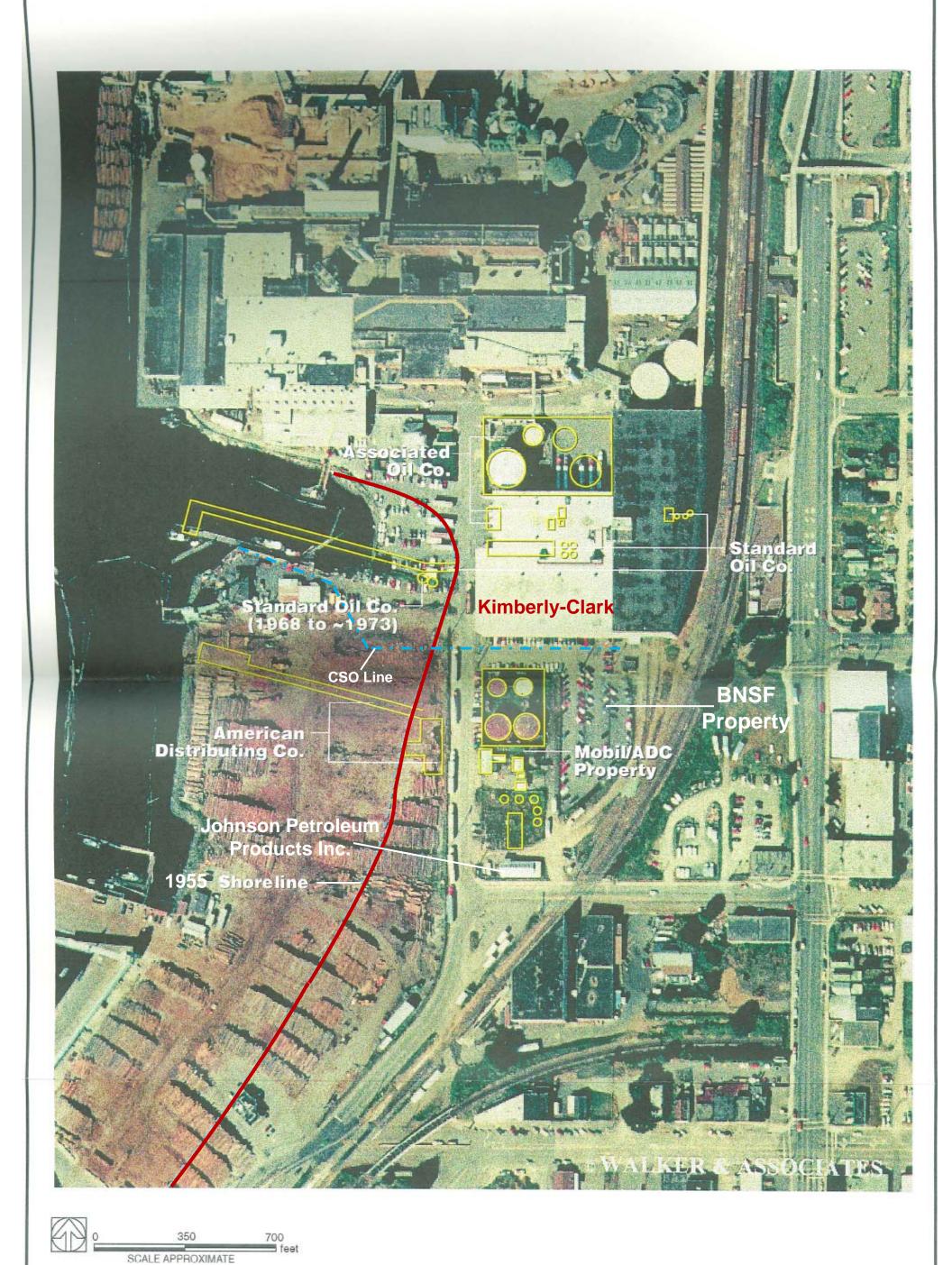


Exhibit A – Figure 3
Snohomish County Assessor's Office Tax Parcel Map

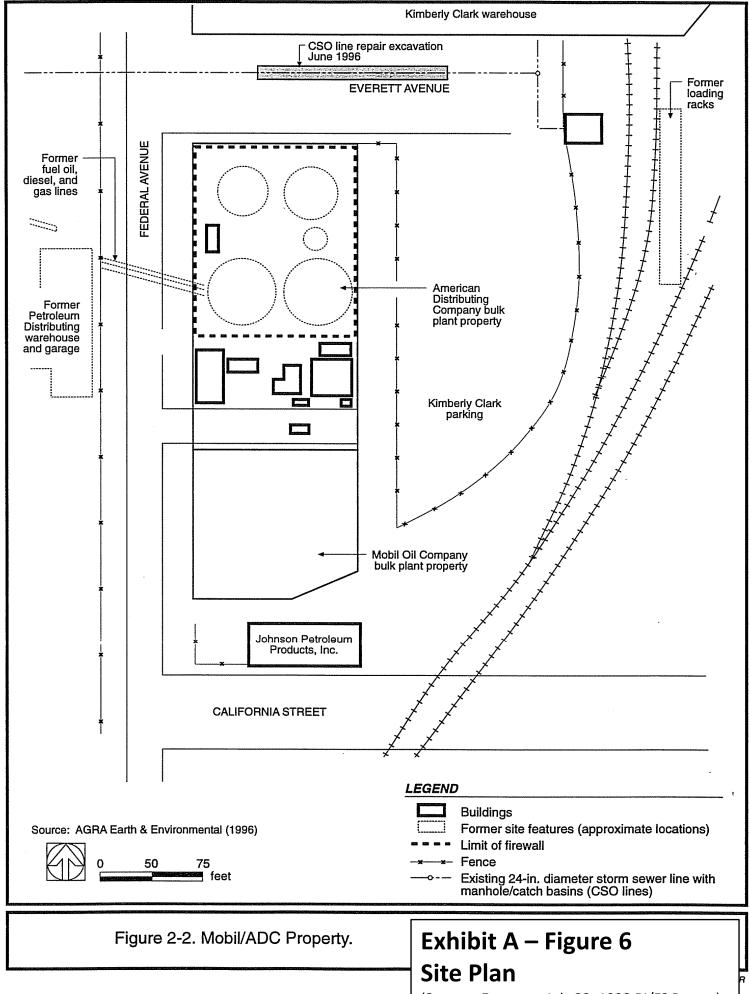






(Source: Exponent July 23, 1998 RI/FS Report)

Figure 2-3. 1955 facility locations superimposed on 1993 aerial photograph of Federal Avenue site.



(Source: Exponent July 23, 1998 RI/FS Report)

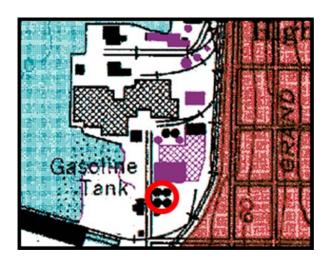
EXXONMOBIL ADC SITE

SITE/PROPERTY LOCATION INFORMATION

The ExxonMobil ADC Site is generally located at 2717 and 2731 Federal Avenue, Everett, Snohomish County, Washington. Site coordinates, a legal description, and county assessor's parcel numbers are provided below.

Coordinates: Latitude: 47°58'53.98" North; Longitude: 122°13'0.05" West.

Latitude/Longitude Reference Point: Location of the former American Distributing Company Above Ground Storage Tanks (see red circle on the figure below).



Legal Description: Section 19, Township 29 North, Range 5 East.

County Assessor's Parcel Numbers (Port of Everett Property): Parcel numbers corresponding to the ExxonMobil and ADC properties include 00437161900100 (A. P. Miller Property) and 00437161901000 (ExxonMobil Property).

Information from the County Assessor's office is attached to this site description.



* R E A L * Property Information

County Home Assessor Home Treasurer Home Information on which Department to contact

Please view <u>Disclaimer</u> If you have questions, comments or suggestions, please <u>Contact Us</u>.

Date/Time:10/13/2008 4:49:15 PM Answers to Frequently Asked Questions about Parcel Data (opens as new window)

Return to Property Information Entry page

Parcel Number 00437161900100 Prev Parcel Reference 43716190010009

View Map of this parcel (opens as new window)

General Information

Taxpayer Name || Address (contact the Treasurer if you have questions)

MILLER AVEN P JR || 926 GRAND - - - EVERETT, WA 98201

If the above mailing address is incorrect and you want to make a change, see the information on Name and Address Changes

Owner Name || Address (contact the Assessor if you have questions)

MILLER AVEN P JR || 926 GRAND - - - EVERETT, WA 98201

If the above name and address is incorrect due to a recent sale, please see the information on Name and Address Changes After a

<u>Sale</u>

Street (Situs) Address (contact the Assessor if you have questions)

2717 FEDERAL AVE - - - EVERETT, WA 98201-3410

Parcel Legal Description

EVERETT DIV C PLAT OF BLK 619 D-00 - TH PTN LOTS 1-2-3-4-5-6-7-8-9 & 10 DAF BAAP ON W LN SD LOT 10 AT INT WLY EXTENSION OF N FACE OF AN 8 INCH CONCRETE FIREWALL SD PT BEING 114.9FT NLY FR SW COR LOT 14 IN SD BLK TH N ALG W LN SD BLK DIST OF 235.1FT TO NW COR SD BLK TH E ALG N LN SD BLK DIST OF 120FT TO NE COR THOF TH S ALG E LN SD BLK DIST OF 234.8FT TO ELY EXTENSION OF THE N FACE AFORMENTIONED 8 INCH CONCRETE FIREWALL TH W ALG SD EXTENSIONS & FACE OF WALL 120FT TO POB

Go to top of page

Treasurer's Tax Information

Taxes For answers to questions about Taxes, please contact the Treasurer's office (opens as new window)

2008 Taxes for this parcel \$1,365.43

Payments: Receipt No. 4608861 5/5/2008 \$682.71

(Taxes may include Surface Water Management and/or State Forest Fire Patrol fees and any fees related to late payments. LID charges, if any, are not included.)

To obtain a duplicate tax statement, either download our <u>Tax Statement Request</u> form or call 425-388-3366 to request it by phone.

Go to top of page

Assessor's Property Data Characteristics and Value Data below are for 2008 tax year.

Please contact the Treasurer's office for answers to questions about Taxes (opens as new window)

For questions ONLY about property characteristics or property values (NOT taxes), please contact the Assessor's Office

Property ValuesValues do not reflect adjustments made due to an exemption, such as a senior or disabled persons exemption. Reductions for exemptions are made on the property tax bill.

Tax Year 2008 Market Land \$143,000 Market Improvement **\$0** Market Total \$143,000 Market Land \$143,000 **\$0** \$143,000 Tax Year 2009 Market Improvement Market Total

Go to top of page

Valuation, Payment, and Property Tax History

View History (opens as new window)

Go to top of page

Property Characteristics

Tax Code Area (TCA) 00010 View Taxing Districts for this Parcel (opens as new window)

Use Code 637 Warehousing & Storage Services

Size Basis ACRE Size 0.65 (Size may include undivided interest in common tracts and road parcels)

Go to top of page

Property Structures

No structures found for this parcel

Go to top of page

Property Sales since 7/31/1999

Explanation of Sales Information (opens as new window)

Sales data is based solely upon excise affidavits processed by the Assessor.

No sales for this parcel have been recorded since 7/31/1999

Go to top of page

Property Maps Township/Range/Section/Quarter, links to maps

Neighborhood 5306000 Explanation of Neighborhood Code (opens as new window)

Township 29 Range 05 Section 19 Quarter SW Find parcel maps for this Township/Range/Section

View Map of this parcel (opens as new window)



* R E A L * Property Information

County Home Assessor Home Treasurer Home Information on which Department to contact

Please view **Disclaimer**

If you have questions, comments or suggestions, please **Contact Us**.

Date/Time:10/13/2008 4:51:40 PM Answers to Frequently Asked Questions about Parcel Data (opens as new window)

Return to Property Information Entry page

Parcel Number **00437161901000** Prev Parcel Reference **43716190100008**

View Map of this parcel (opens as new window)

General Information

Taxpayer Name || Address (contact the Treasurer if you have questions)

MOBIL OIL CORPORATION || PO BOX 4973 - - - HOUSTON, TX 77210

If the above mailing address is incorrect and you want to make a change, see the information on Name and Address Changes

Owner Name || Address (contact the Assessor if you have questions)

MOBIL OIL CORPORATION || PO BOX 53 - - - HOUSTON, TX 77001-0053

If the above name and address is incorrect due to a recent sale, please see the information on Name and Address Changes After a

<u>Sale</u>

Street (Situs) Address (contact the Assessor if you have questions)

2731 FEDERAL AVE - - - EVERETT, WA 98201-3410

Parcel Legal Description

Section 19 Township 29 Range 5 Quarter SE - THAT PTN LOT 10 LY S OF LN DAF BAAP ON W LN LOT 10 235.1FT S OF NW COR SD BLK BEG SD DESC LN TH ELY TAP ON E LN LOT 10 234.8FT S OF NE COR SD BLK TERM SD DESC LN TGW LOTS 11-13 INC & TGW BAAP ON E LN LOT 14 2.6FT S OF NE COR TH N 2.6FT TH TH W 120FT TH S 25FT TH E TO A POINT 52.9FT W OF SE COR LOT 14 TH NELY TO POB EXC THAT PTN LOTS 11 THRU 14 LY S & SELY OF FDL: BAAP ON W LN SD LOT 13 PT BEAR N01*58 49E 75.00FT FR SW COR LOT 16 SD PLAT MEAS ALG W BDY SD LOTS 13-16 TH S87*58 21E 79.84FT TH N33*01 24E 78.25FT M/L TO E BDY SD LOT 11 AND TERM SD DESC LN EXC THAT PTN SD LOT 14 DAF: BAAP ON E LN SD LOT 14 DIST 2.6FT S OF NE COR THOF TH S ALG SD E LN TO SE COR THOF TH W ALG S LN SD LOT 14 DIST 52.9FT TH NELY ALG STRT LN TO POB PER SCC #01-2-03480-2

Go to top of page

Treasurer's Tax Information

Taxes For answers to questions about Taxes, please contact the Treasurer's office (opens as new window)

2008 Taxes for this parcel \$441.13

Payments: Receipt No. 4494514 4/25/2008 \$441.13

(Taxes may include Surface Water Management and/or State Forest Fire Patrol fees and any fees related to late payments. LID charges, if any, are not included.)

To obtain a duplicate tax statement, either download our <u>Tax Statement Request</u> form or call 425-388-3366 to request it by phone.

Go to top of page

Assessor's Property Data Characteristics and Value Data below are for 2008 tax year.

Please contact the Treasurer's office for answers to questions about Taxes (opens as new window)

For questions ONLY about property characteristics or property values (NOT taxes), please contact the <u>Assessor's Office</u>

Property Values

Values <u>do not</u> reflect adjustments made due to an exemption, such as a senior or disabled persons exemption. Reductions for exemptions are made on the property tax bill.

Tax Year	2008	Market Land	\$46,200	Market Improvement	\$0	Market Total	\$46,200
Tax Year	2009	Market Land	\$46,200	Market Improvement	\$0	Market Total	\$46,200

Go to top of page

Valuation, Payment, and Property Tax History

View History (opens as new window)

Go to top of page

Property Characteristics

Tax Code Area (TCA) 00010 View Taxing Districts for this Parcel (opens as new window)

Use Code 637 Warehousing & Storage Services

Size Basis ACRE Size 0.21 (Size may include undivided interest in common tracts and road parcels)

Go to top of page

Property Structures

No structures found for this parcel

Go to top of page

Property Sales since 7/31/1999

Explanation of Sales Information (opens as new window)

Sales data is based solely upon excise affidavits processed by the Assessor.

No sales for this parcel have been recorded since 7/31/1999

Go to top of page

Property Maps Township/Range/Section/Quarter, links to maps

Neighborhood 5306000 Explanation of Neighborhood Code (opens as new window)

Township 29 Range 05 Section 19 Quarter SW Find parcel maps for this Township/Range/Section

View Map of this parcel (opens as new window)



FOCUSED FEASIBILITY STUDY WORK PLAN ExxonMobil / ADC Property, Ecology Site ID 2728 2717/2731 Federal Avenue Everett, Washington

Submitted to:

ExxonMobil Environmental Services

East Providence Terminal 1001 Wampanoag Trail Riverside, Rhode Island 02915

And

American Distributing Company

13618 45th Avenue NE Marysville, Washington 98271

Submitted by:

AMEC Earth & Environmental, Inc.

11810 North Creek Parkway North Bothell, Washington 98011

February 26, 2010

AMEC Project No. 9-915-15716-C



2/26/2010

February 26, 2010 Project No. 9-915-15716-C

ExxonMobil Environmental Services East Providence Terminal 1001 Wampanoag Trail Riverside, Rhode Island 02915

Attention:

Mr. Joseph Abel

American Distributing Company 13618 45th Avenue NE Marysville, Washington 98271

Attention:

Mr. Miller

Subject:

Focused Feasibility Study Work Plan

ExxonMobil / ADC Property, Ecology Site ID 2728 2717/2731 Federal Avenue, Everett, Washington

AMEC Earth & Environmental, Inc. (AMEC) is pleased to submit this Focused Feasibility Study Work Plan that incorporates a Data Gap Investigation sampling and analysis plan for the above-referenced property located in Everett, Washington.

We appreciate the opportunity to have served you on this project. If you have any questions or desire further information, please feel free to contact us at (425) 368-1000.

Sincerely,

AMEC Earth & Environmental, Inc.

Anastasia Speransky, LHg Project Hydrogeologist Gary Dupuy, LHg Principal

AMEC Earth & Environmental, Inc. 11810 North Creek Parkway North Bothell, Washington 98011 (425) 368-1000 Phone (425) 368-1001 Facsimile www.amec.com

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ACRONYMS AND ABBREVIATIONS

ADC American Distributing Company

ADC Parcel northern parcel

AGRA AGRA Earth & Environmental, Inc. **AMEC** AMEC Earth & Environmental, Inc.

ASTs aboveground storage tanks

below ground surface bgs

BNSF Burlington Northern Santa Fe Railway

BTEX benzene, toluene, ethylbenzene, and xylenes

CAP cleanup action plan **Chevron Corporation** Chevron cPAHs carcinogenic PAHs CSM conceptual site model CSO combined sewer overflow **CSTO** California Street Overcrossing

DAHP Washington State Department of Archaeology and Historic Preservation

DO dissolved oxygen

Washington State Department of Ecology **Ecology** U.S. Environmental Protection Agency EPA **EPH** extractable petroleum hydrocarbons ERI Environmental Resolutions, Inc.

ESA Endangered Species Act

ESE Environmental Science and Engineering, Inc.

ExxonMobil ExxonMobil Oil Corporation

ExxonMobil Parcel southern parcel °F degrees Fahrenheit **FFS** Focused Feasibility Study

General Petroleum General Petroleum of California

gallons per minute gpm **GPR** ground penetrating radar

HSA hollow stem auger

indicator hazardous substances IHSs

KC Kimberly-Clark Kleinfelder Kleinfelder, Inc.

liquid-phase petroleum hydrocarbons LPH

micrograms per liter µg/L mg/kg milligram per kilograms MNA

monitored natural attenuation

Mobil Oil Corporation Mobil MSL mean sea level

MTBE methyl tertiary-butyl ether MTCA Model Toxics Control Act

NWTPH-Dx Northwest Total Petroleum Hydrocarbons-Diesel extended **NWTPH-Gx** Northwest Total Petroleum Hydrocarbons-Gasoline extended Order Agreed Order

PAHs polycyclic aromatic hydrocarbons PCS petroleum-contaminated soil PEG Pacific Environmental Group, Inc.

PSO Puget Sound Outfall

P&T groundwater pump-and-treat PTI PTI Environmental Services

PVC polyvinyl chloride

Premier Premier Environmental Services, LLC

Property ExxonMobil/ADC Property

QA quality assurance

RAOs remedial action objectives

RZA Rittenhouse-Zeman & Associates, Inc.

SAP Sampling and Analysis Plan

Scott Paper Company

Standard Oil Company of California

SVE soil vapor extraction

SVOCs semivolatile organic compounds TEQs toxicity equivalent quotients

Texaco Refining and Marketing, Inc.

TPH total petroleum hydrocarbons

TPH-D total petroleum hydrocarbons-diesel TPH-O total petroleum hydrocarbons-oil

TPH-G total petroleum hydrocarbons–gasoline

USCG U.S. Coast Guard

VPH volatile petroleum hydrocarbons WAC Washington Administrative Code

WP Work Plan

WRCC Western Regional Climate Center

FOCUSED FEASIBILITY STUDY WORK PLAN 2717/2731 FEDERAL AVENUE EVERETT, WASHINGTON February 26, 2010

1.0 INTRODUCTION

AMEC Earth & Environmental, Inc. (AMEC), has prepared this Focused Feasibility Study (FFS) Work Plan (WP) on behalf of ExxonMobil Oil Corporation (ExxonMobil) and the American Distributing Company (ADC) for the ExxonMobil/ADC Property (the Property) located at 2717 and 2731 Federal Avenue in Everett, Washington. AMEC prepared this document to provide background for preparing the FFS and to describe the rationale for additional soil and groundwater investigations at the Property and its vicinity. A Sampling and Analysis Plan (SAP), included as Appendix A to this Work Plan, addresses the specific field sampling activities, chemical analyses, and quality assurance (QA) procedures that will be conducted during additional investigations at the Property. This work plan is based on the Washington State Department of Ecology (Ecology) Model Toxics Control Act (MTCA) Cleanup Regulations, Washington Administrative Code (WAC) 173-340.

1.1 Purpose of the Work Plan

The purposes of this Work Plan are to:

- Present the history of past ownership and operations of the Property and its surroundings (Site);
- Summarize past investigation and interim remedial activities;
- Present the Conceptual Site Model (CSM); and
- Identify any remaining data gaps to complete the FFS.

1.2 Organization of the Report

This FFS WP is organized as follows.

Section 1 Purpose and Organization of the FFS WP.

Section 2 Regulatory background and physical setting.

Section 3 Summary of previous investigations and interim remedial actions.

Section 4 Description of ongoing groundwater monitoring program.

Section 5 Discussion of preliminary screening levels.

Section 6 Summary of environmental conditions at the Site.

- **Section 7** Conceptual Site Model and evaluation of potential receptors and exposure pathways.
- **Section 8** Approach to conducting the focused feasibility study, including proposed supplemental investigations for addressing data gaps and a preliminary review of potential remedial technologies.
- **Section 9** List of references cited in the text.

2.0 SITE SETTING AND BACKGROUND

This section summarizes the ownership and history of the Property and surrounding area, regulatory and compliance history, and environmental setting.

2.1 Property and Vicinity Description

The Property is located east of Federal Avenue and between California Street and Everett Avenue in the northwest portion of Everett, in Snohomish County, Washington (Figure 1). The Property consists of two parcels that occupy 0.86 acres of land (Figure 2). According to the Snohomish County Tax Assessor records, the southern parcel (the ExxonMobil Parcel) is located at 2731 Federal Avenue, is owned by the Mobil Oil Corporation of Houston, Texas, and occupies approximately one-third of the Property. The northern parcel (the ADC Parcel) is located at 2717 Federal Avenue. The ADC Parcel is owned by the Estate of Mr. Miller of Everett, Washington, and occupies approximately two-thirds of the Property. Currently, no structures or aboveground or underground storage tanks are present on either parcel. The Property is asphalt-paved and currently leased for parking by the adjacent Kimberly-Clark Corporation (KC) facility. A garage that was leased by ADC from approximately the 1930s and later by ADC and General Petroleum Corporation until early 1970s was formerly located to the west of the Property, across Federal Avenue. The layout of the Property and immediate vicinity are shown on Figure 2.

The KC property is located immediately north of the ADC Parcel, at 2600 Federal Avenue. The KC property includes a manufacturing plant for paper products and a warehouse. Presently, Terminal Avenue overcrosses the Burlington Northern Santa Fe Railway (BNSF) line, which is located to the east and south of the Property. Glacier Cold Storage is located beyond Terminal Avenue and the BNSF railway corridor. The properties to the east are currently occupied by BNSF. The properties to the west, beyond Federal Avenue, are occupied by the Port of Everett and Dunlap Towing. The shoreline of Port Gardner Bay is situated approximately 300 feet to the west.

In this document "the Property" will refer to the two contiguous parcels owned by ExxonMobil and by ADC. The Property and portions of neighboring parcels where releases of hydrocarbon contamination on the Property may have migrated comprise the ExxonMobil/ADC Site (Ecology Facility ID 2728), as defined by MTCA (hereafter referred to as "the Site"). The precise boundaries of the Site (i.e., the extent of soil and groundwater contamination resulting from the historic operations on the Property) have not yet been determined. Locations within the Property boundary may be referenced as the Property or on-Property, and locations outside the Property boundaries may be referenced as off-Property.

2.2 Site Ownership and Operational History

Historical maps and documentation for the Property and surrounding parcels are compiled in Appendix B. Figures 3 through 14 shows the history of the Property and its surroundings by

superimposing features visible on historical maps and aerial and historical aerial photographs over a contemporary aerial photograph from 2003.

ExxonMobil was formed in 1999 by the merger of Exxon and Mobil Oil Corporation. The Mobil Oil Corporation (Mobil) was the successor to Socony-Mobil Oil Company, Inc., a New York corporation, which merged in or about 1959 with General Petroleum of California (General Petroleum).

From at least the 1920s, the Property was used for petroleum bulk storage, transfer, and distribution operations; marine offloading; truck loading; and rail loading and/or unloading operations of petroleum products that included fuel oils, stove oil, Bunker C, diesel, gasoline, and a blend of synthetic and petroleum base fluids specially designed for compressor applications PS300. (AGRA 1996a). However, only small quantities (55-gallon drum or smaller) of PS300 likely were used/stored at the Property.

2.2.1 ExxonMobil/ADC Property

According to the 1902 Sanborn Fire Insurance map, the Property was occupied at that time by wooden residential dwellings that lined the historic shoreline of Port Gardner Bay. The Property is labeled "marsh" on the 1902 Sanborn map. By 1914, the entire Property became vacant as shown on the 1914 Sanborn map. In 1915, the City of Everett passed Ordinance No. 1674 granting the Standard Oil Company of California (Standard; now known as Chevron) permission to construct a tank farm consisting of three aboveground storage tanks (ASTs) on Lot 1 of Block 619 (the northern portion of the ADC Parcel [Appendix B]), with piping leading to Standard's dock on the waterfront. However, it is not certain that the tank farm was actually built. According to the Everett Plant Yard and Tank Elevations Plot Plan, dated April 8, 1946, a portion of the Property was covered by a garbage dump in 1917 (Appendix B). A search for records regarding the dump was conducted at the Washington State Department of Archaeology and Historic Preservation (DAHP) in Olympia and at the Everett Public Library's Northwest History Room. No information was found about the dump existing at the Property and vicinity. Additionally, no evidence was found of previously recorded archaeological sites and/or historic buildings located on this parcel. To date, no Traditional Cultural Properties have been identified (i.e., on record with DAHP) within the project area. Based on historical research, it appears the Property was never used as a formal dump/sanitary landfill that accepted refuse from a city agency or wider geography.

In 1922, Gilmore Oil Co. Ltd. (predecessor to General Petroleum) first leased the Property from the Great Northern Railway of Minnesota (a predecessor to BNSF) for petroleum bulk storage, transfer, and distribution operations; marine offloading; truck loading; and rail loading and/or unloading operations (Appendix B). In 1927, Gilmore Oil Co. Ltd. became an owner of the Property (Appendix B) and General Petroleum and successors to the property, which included Mobil and ADC, continued bulk plant operations. In 1974, Mobil sold the northern two-thirds of the Property (the current ADC Parcel) to Mr. A. P. Miller for use by ADC and continued to operate a small bulk plant on the southern one-third of the Property (the ExxonMobil Parcel) until 1987. ADC continued to operate a terminal until 1990.

In 1985, the recorded on-Property structures on the ExxonMobil Parcel included two warehouse buildings, a pumphouse, and two diked fuel storage areas, each of which included two 25,000-gallon ASTs. Each pair of tanks was completely enclosed by a concrete dike ranging in height from approximately 4 to 12 feet. According to Rittenhouse-Zeman & Associates, Inc. (RZA) (RZA 1985), evidence of surface spillage on the ExxonMobil Parcel was apparent at several areas, including the unloading racks, pumphouse, and near the outdoor drum storage area. RZA (1985) reported that a number of unintentional releases of petroleum products had occurred in the past due to tank leakage, tank overfills, and surface spills associated with the four ASTs. In addition, fuel storage tanks were present prior to the RZA study in the northwest corner of the ExxonMobil Parcel. The structures on the ExxonMobil Parcel were demolished in approximately 1987.

By 1990, four large ASTs with capacities ranging from 5,037 to 9,345 barrels and five small ASTs with capacities ranging from 135 to 714 barrels, surrounded by a 13-foot-high concrete firewall, occupied the northern half of the ADC Parcel. An office building, a warehouse, a boiler room, an oil pump house, loading racks, and overhang canopies were located within the southern portion of the ADC Parcel. In addition, a 1,000-gallon AST, aboveground piping, and a concrete wall were located within the southern portion of the ADC Parcel. All structures on the ADC Parcel were demolished in 1998.

In 1999 the Property, to meet the requirements of the 1998 Agreed Order (DE-98TCP-N223), was asphalt-capped for intermittent use as a parking lot by neighboring businesses.

2.2.2 History of Surrounding Properties

Several other facilities located to the north and northeast of the Property historically operated as petroleum bulk facilities and included fuel pipelines, pumping facilities, storage facilities, railroad spurs, and railroad and maritime loading facilities. AGRA Earth and Environmental, Inc. (AGRA), identified various corporations that had operations that could have resulted in releases of contaminants in the vicinity of the Property. These corporations included BNSF Company, Chevron Corporation (Chevron), KC, Scott Paper Company (Scott), and Texaco Refining and Marketing, Inc. (Texaco).

Historical features and operations of properties that surround the Property to the north, south, east, and west are shown on Figures 3 through 14. A brief summary of operations and activities at the properties is presented below.

North, Northeast, and Northwest

In 1930, the area to the north and northeast of the Property (currently occupied by KC) was occupied by Associated Oil Company (predecessor to Texaco) and Standard, based on the 1930 Great Northern Railway real estate map and Sanborn maps. Two railroad spurs labeled "Associated Oil Co." and "General Petroleum Corp" are located to the east of the Property and extend north. Three small oil ASTs were located at that time at the eastern boundary of the Standard property adjacent to a railroad spur labeled "Standard Oil Co." (Figures 3 and 4).

In 1947, four small and two large ASTs were located on the Associated Oil Company property to the north of the ADC Parcel, and three small Standard Oil ASTs remained next to the railroad spur (Figures 5 and 6).

According to a 1955 aerial photograph (Figure 7), four small ASTs were installed half-way between the Associated Oil Company tank farm and the General Petroleum tank farm (Figure 8). Standard issued a quit claim for the Standard parcel to Scott Paper Company in 1958. In 1963, Standard Oil sold its remaining property to Scott.

According to a 1967 aerial photograph (Figure 9), the number of ASTs present on the Associated Oil property expanded from six to eight (as compared to the 1955 aerial photograph) with the addition of two large fuel oil ASTs. The four small fuel oil ASTs located just south of Associated Oil's fuel farm were also present on the 1967 aerial photograph. By that time, KC's T-shaped warehouse was built over three different former Standard ASTs (Figure 10).

The five ASTs located on the Associated Oil Company fuel farm were still visible in the 1976 aerial photograph (Figures 11 and 12). In addition, two large ASTs located northeast of Associated's fuel farm and north of the KC warehouse appear on the 1976 aerial photograph. The ownership of these two ASTs is not clear, however, according to the Polk City directories Scott Paper Co. was listed as occupying at the area to the north from 1958 to 1995. KC was listed as the owner of this property from 1995 until present.

Two of the Associated Oil Company ASTs remain visible in the 1993 aerial photograph (Figures 13 and 14). The two ASTs north of the KC warehouse are also visible in the 1993 photograph. In 1995, KC purchased the Scott property. A reconnaissance of the Property and vicinity conducted by AGRA in 1996 (AGRA, 1996a) indicated that one of the larger ASTs in the former Standard fuel farm was labeled as containing #3 Fuel Oil, and one of the smaller ASTs was labeled "caustic". The contents of the ASTs north of the KC warehouse are unknown (AGRA, 1996a).

South

In the late 1980s to early 1990s, Mr. Jack Johnston (part-owner of Johnston Petroleum) purchased the adjacent property south of the ExxonMobil Parcel from BNSF. The Johnston property has been used for parking vehicles, storing packaged goods and oils, and receiving containers (e.g. drums) to be shipped to a recycling facility. In 2001, the California Street Overcrossing ramp was constructed covering the Johnston Estate Parcel and the southeast corner of the ExxonMobil Parcel. The former Johnston property is depicted on Figure 14.

West

According to the 1930 Great Northern Railway real estate map, Sanborn maps and a lease document, ADC leased from Great Northern Railway the building located to the west of Federal Avenue and between 26th Street and California Street (Figures 3 to 10). The lease commenced in 1937 and extended till 1971. General Petroleum (predecessor of ExxonMobil) sub-leased the building from ADC between 1951 and 1971. General Petroleum and ADC stored oil and grease and trucks in the warehouse and oil in steel drums adjacent to the warehouse. A wash rack and

boiler room was located in the southern end of the building in 1957 (1957 Sanborn map). According to aerial photographs, the warehouse was removed sometime prior to 1976. In addition, a fuel pier that was adjacent to the warehouse and extended westward into Port Gardner Bay was leased by ADC and sub-leased to General Petroleum. In 1973 the western shoreline was infilled to its current configuration by the Port of Everett. The Port of Everett currently owns the properties to the west of the Property. The Port of Everett uses these properties as a storage yard.

East

According to the 1930 Great Northern Railway real estate map and Sanborn maps, the property to the east has belonged to Burlington Northern (later known as BNSF) since 1930.

Photographs and building plans showed a spur to the east of the Property that with a petroleum-loading rack used to pump oil into railroad tank cars. In a 1947 photograph, the area appears to be unpaved with low-lying vegetation. The area appears to be predominantly used as an open parking lot during 1955, 1967, 1985, 1993, and 2003 (photograph). According to the City of Everett Tax Assessor records, the property to the east belongs to BNSF and is used as an open parking lot for KC workers. The City of Everett right-of-way alley separates the Property from the BNSF parcel.

2.3 Site Regulatory History

Petroleum contamination has been found in soil and groundwater beneath the Property and beneath properties to the west (Port of Everett), north (Everett Avenue right-of-way and adjacent to the KC warehouse), and east (BNSF property and in the vicinity of the former loading racks).

In October 1995, free-phase petroleum liquid characterized as biodegraded heavy fuel oil fractions was observed to have seeped through the City of Everett's combined sewer overflow (CSO) line in Port Gardner Bay. The United States Coast Guard (USCG) performed multiple phases of petroleum hydrocarbon finger printing/typing analysis of the liquid-phase petroleum hydrocarbons (LPH) discharging into Port Gardner Bay from samples collected at the CSO and surrounding wells (Appendix B). Typing analysis of the LPH indicated that the petroleum hydrocarbons in Port Gardner Bay had characteristics similar to several petroleum products, including No. 2 fuel, heavy fuel oil (Bunker C), and weathered crude oil. The results of the fingerprinting indicated that there were likely multiple sources that contributed to the spill observed emerging from the CSO (*i.e.*, some samples from the Bay were similar to petroleum hydrocarbons from the Property but many were not). Fingerprinting of petroleum hydrocarbon from the Property in 1995 and 2006 identified a range of products including degraded diesel mixed with degraded gasoline and heating oil. Samples from the eastern part of the Property collected in 1995 had characteristics of heavy oil similar to Bunker C or crude oil.

There is no history of crude oil storage on the Property as the facility was used for finished product distribution.

In 1995, Mobil and ADC entered into an Agreed Order (Order) (DE-95TC-N402) with Ecology to take necessary steps to clean up, eliminate, and/or contain petroleum releases at and near the City of Everett CSO discharge line and/or diffuser into Port Gardner Bay. The 1995 Order also required pilot testing of petroleum recovery technologies; characterization of the nature of contamination in the vicinity of the CSO line; and repair of the CSO line. Interim remedial actions were undertaken and studies performed at the Site demonstrated that the pathway to the Bay had been removed. Approximately 23,000 gallons of petroleum were recovered within the vicinity of the CSO line by various interim remedial measures. In December 1996, Ecology issued notice of potential liability letters to Kimberly-Clark, Texaco, BNSF, Scott Paper, and Chevron which stated that there was credible evidence of releases of hazardous substances from the properties owned or operated by each of these companies.

In 1998, Mobil and ADC entered into a new Agreed Order (DE-98TCP-N223) with Ecology to complete a remedial investigation/FFS. Remedial action objectives (RAOs) were developed and approved by Ecology using existing analytical data, agreed-upon exposure pathway analyses, and a screening-level risk assessment. The cleanup approach selected to achieve RAOs included an LPH interceptor trench along the western and northern boundaries of the Property and a low-permeability cap over the Property. The interceptor trench and cap were installed in 1999.

Periodic groundwater monitoring began at the Site in the early 1990s. Regular quarterly groundwater monitoring and monthly LPH gauging and removal commenced in 2002, as a continued requirement under the 1998 Agreed order and in accordance with a monitoring program specified by Premier Environmental Services, LLC (Premier) (Premier 2002) and submitted to Ecology.

In 2007, the groundwater monitoring frequency for the Site was reduced from quarterly to semiannually. This change in monitoring frequency was verbally accepted by Ecology in February 2007 and followed up with a letter on May 8, 2007. The acceptance was again confirmed in a meeting with Ecology on August 8, 2007.

In 2009, a third Agreed Order between Ecology, ExxonMobil, and ADC was negotiated for the Site. The draft Agreed Order to be issued for public comment specifies that an FFS and Draft Cleanup Action Plan (CAP) be prepared to identify the nature and extent of site soil and groundwater contamination and a preferred final cleanup action to address contamination in soil and groundwater at the ExxonMobil/ADC Site in compliance with requirements under MTCA.

2.4 Environmental Setting

This section presents a summary of general environmental conditions at the Property and immediate vicinity. The Property is located in the southwest quarter of Section 19, Township 29 North, Range 5 East, Willamette Meridian. The nearest surface water is Port Gardner Bay of Possession Sound, located approximately 300 feet west of the Property.

2.4.1 Topography

The topography of the Property and immediate vicinity is relatively flat with an elevation of approximately 11 feet above mean sea level (MSL). The area slopes gently to the west toward Port Gardner Bay. Higher elevations, up to 150 feet above MSL, exist to the east of the Property. The surrounding area consists of roadways, industrial buildings surrounded by parking lots, and a storage area.

2.4.2 Geology and Hydrogeology

Soil boring, monitoring well, and test pit logs are compiled in Appendix C. The stratigraphy underlying the Site is displayed on geologic cross-sections A-A', B-B', and C-C', which are presented on Figures 16 though 18, respectively. The locations of the cross-sections are shown on Figure 15.

The area surrounding the Property is underlain by Vashon advance outwash deposits (Qva) and Transitional beds (Qtb). The outwash deposits are primarily granular, and the Transitional beds are composed of interbedded clayey, silty fine to medium sand. Based on subsurface investigations conducted at the Property and surrounding vicinity, the area is underlain by a heterogeneous mixture of fill materials consisting of very loose to medium dense brown, brownish gray, and gray silty sand and sand with areas of wood and brick debris extending to depths of approximately 5 to 10 feet below ground surface (bgs).

Previously, the materials encountered beneath the shallow fill were interpreted as additional fill materials extending to approximate depths of 20 to 27 feet bgs. The deeper materials were reported to be consistent in color (gray) and were characterized as silty sand and silt and dark-brown to black peat mixed with wood debris. However, based on review of previous investigations conducted during preparation of this FFS WP, the grey silty sand/silt unit with peat mixed with wood debris can be interpreted as native marsh deposits. Materials that occur beneath the Property at depths greater than 20 to 27 feet bgs consist of dense, moist, brown, medium sand with various amounts of silt and discontinuous stiff, brown, organic-rich, clayey silt with some fine sand. The deeper materials were interpreted to be Quaternary-aged transitional beds, deposited between Fraser and pre-Fraser glaciations.

Due to the proximity of the Site to Port Gardner Bay, shallow unconfined groundwater occurs at the Site and surroundings at depths of 1 to 5 feet bgs. Previous groundwater elevation data indicate fluctuations between high and low seasonal water tables of up to 3 feet. Based on the historical groundwater elevation data, groundwater beneath the Property flows generally to the west and to the northwest (Figure 19).

2.4.3 Surface Water Hydrology

Surface water at the Property flows to the west and northwest, following the surface slope, toward seven catch basins on the Property. The catch basins are located in two linear groups, which are oriented north-south (Figure 2). Catch basins CB05, CB03, CB04, and CB06 (listed south to north) are approximately 70 feet east of the western boundary of the Property. Catch basins CB07, CB01, and CB02 (listed south to north) are approximately 15 feet east of the

western boundary of the Property. The area is served by a combined (storm and sanitary) sewer. Sewage is pumped to and treated at the City of Everett sewage treatment plant. The storm sewer system at the Property is shown on Figure 2.

2.4.4 Meteorology

Everett has a moderate climate usually classified as Marine west coast, typified by wet, cool winters and relative dry, warm summers. Temperature extremes are moderated by the proximity to the adjacent Puget Sound and the greater Pacific Ocean. The region lies in a partial rain shadow, partially protected from Pacific storms by the Olympic Mountains, and from Arctic air by the Cascade Range.

The Western Regional Climate Center (WRCC) provides a summary of Climatological statistics for Everett Junior College (located approximately 2 miles from the Property) (WRCC 2009). The average annual temperature measured at Everett Junior College is 50.6 degrees Fahrenheit (°F). Average monthly temperature varies from about 39°F in January to about 63°F in July and August. Winters are cool and wet with average lows around 35°F on winter nights. Colder weather can occur, but seldom lasts more than a few days. Summers are dry and warm, with average daytime highs around 73°F. Hotter weather usually occurs only during a few summer days. The hottest official recorded temperature was 98°F on June 6, 1955; the coldest recorded temperature was 0°F on November 11, 1993 (WRCC 2009).

Total annual precipitation is about 35.5 inches, with about two-thirds of the rainfall occurring during the wet season from October through March. Monthly average rainfall varies from a maximum of 5.02 inches in December to 1.03 inch in July. Most of the precipitation falls as drizzle or light rain, with only occasional downpours (WRCC 2009). The 10-year and 100-year recurrence interval, 24-hour precipitation events are approximately 2.25 inches and 3.25 inches, respectively (Miller et al. 1973).

2.4.5 Ecological Setting

The Property is located near the marine shoreline in the Snohomish River basin (Water Resource Inventory Area 7), in an area zoned for heavy industrial development. The Everett Naval Station is located to the north and northeast of the Site. No wetlands, streams, shorelines, floodplains, or functional wildlife habitat occur on the Property. Nearby environmentally sensitive areas include Port Gardner and the Snohomish River.

Port Gardner is located 300 feet west of the Property and contains the nearest wildlife area. The portion of Port Gardner shoreline located near the ExxonMobil/ADC Site is classified as Dungeness crab (*Cancer magister*) habitat, according to the City of Everett Fish and Wildlife Habitat Conservation Areas Critical Areas Map (City of Everett, 2006).

Species listed under the Endangered Species Act (ESA) and Washington State Priority Species may be present in Port Gardner. ESA-listed species present in Port Gardner may include Chinook salmon (*Oncorhynchus tshawytscha*), bull trout (*Salvelinus confluentus*), coho salmon (*O. kisutch*), and steelhead (*O. mykiss*). Adult salmonid use of the area is limited to migration

and possibly physiological transition. Juvenile use of the area is similar, but may also include feeding/rearing and refuge from predation (City of Everett 2002).

Common invertebrates present in Port Gardner include snails (*Littorina spp.*), mussels (*Mytilus cf. edulis*), clams (*Macoma balthica, Macoma spp., Cryptomya spp.*), cockles (*Clinocardium sp.*), jingle shells (*Pododesmus macroschisma*), polychaetes (*Nereis spp., Notomastus spp., Nephtys spp., Glycera spp.*), barnacles (*Balanus glandula*), shore crabs (*Hemigrapsus spp.*), isopods (*Gnorimosphaeroma oregonesis*), ghost shrimp (*Callianassa sp.*), blue mud shrimp (*Upogebia pugettensis*), Dungeness crab (*Cancer magister*), red crab (*C. productus*), and anemones (*Mertridium senile*) (City of Everett 2002).

Water quality in Port Gardner meets Washington State requirements for all parameters and is not listed on the Ecology's 303d list.

The Snohomish River is situated east and north of the ExxonMobil/ADC Property, approximately 1.5 miles away at the closest point. The River is separated from the Property by areas of industrial and other development, including the City of Everett's Central Business District, residential and commercial development, and areas of industrial and maritime services along the Snohomish River shoreline.

As mentioned previously, no wetlands, streams, shorelines, floodplains, or functional wildlife habitat occur on the Property or within the immediate vicinity (NWI 2009; City of Everett 2006, 2009). Vegetation in the vicinity of the Property is sparse and generally limited to maintained landscaping, including ornamental shrubs and trees. The nearest stream habitat is Pigeon Creek #1 and its associated wetlands, located approximately 1 mile southwest of the Property.

2.4.6 Tidal Influence

Tidal studies were conducted at the Property by RZA AGRA in 1991 and AMEC in 2008. As reported by Exponent (1998a), AGRA monitored water levels in selected monitoring wells for a 48-hour period to measure the recovery after the 24-hour aquifer test and to assess potential tidal influences in shallow groundwater. During the 48-hour period, no clear evidence of tidal fluctuations was noted. Based on the results of the recovery monitoring, the observed hydraulic gradient at the Property, and the distance from Port Gardner Bay, it was concluded that tidal influences on shallow groundwater at the Property would be expected to be negligible (Exponent, 1998a).

No determinations were made based on AMEC's (2008b) tidal study results, and further tidal influence studies will be conducted (see Section 8.1.4).

2.4.7 Historic and Cultural Resources

Records were researched at the DAHP in Olympia and at the Everett Public Library's Northwest History Room. No information regarding historic and cultural resources was found for the Property. Additionally, there are no previously recorded archaeological sites and/or historic buildings located on the Property. Although no specific Traditional Cultural Properties have been identified within the project area, the Everett waterfront in general has a long history of tribal

use. A brief summary of tribal use associated with the Everett waterfront along with tribal engagement activities that have taken place for the project was provided by Ecology and is set forth below.

Ecology is working with landowners/stakeholders including local Indian tribes to cleanup contaminated sites and sediments in the vicinity of Port Gardner Bay area and the Snohomish River Estuary. Port Gardner Bay is identified as a high-priority, "early-action" cleanup area under the Puget Sound Initiative (PSI). The ExxonMobil/ADC Site has been identified as a cleanup site under the PSI. Local tribes that have been actively engaged by Ecology under the PSI at Port Gardner include the Tulalip, Suquamish, Swinomish, and Lummi. Ecology has worked with a tribal liaison to assist in developing contacts and early engagement with cultural and natural resource sections within each of the aforementioned tribes. Engagement with the tribes has consisted of meetings to discuss PSI cleanup sites and cultural resources, providing the tribes with draft work products for early input, and providing them with a monthly update containing the current status of each PSI site, near term work products for tribal review, project schedules, and a summary of tribal engagement for the Port Gardner Puget Sound Initiative Sites.

Based on Ecology's discussion with the tribes and information provided in a 1973 *Historical Survey of Everett* (Dilgard and Riddle, 1973), people have inhabited the Port Gardner Bay area for thousands of years. For centuries, the northwest point of the peninsula (i.e., Preston Point) was the site of Hebolb, the principal village of the Snohomish tribe. Its location near the mouth off the Snohomish River and next to Port Gardner Bay provided both abundant food and transportation. Native tribes used the Everett shoreline in part for subsistence activities such as shellfish collection, hunting, plant gathering, and fishing. According to local tribes, native long houses were located up and down the Everett waterfront. Local tribes have communicated to Ecology that the Everett waterfront is a culturally sensitive area. With that in mind, the SAP outlines procedures to be used in the event cultural resources are encountered during site activities.

Historic maps and aerial photographs of the project area were also consulted. Sanborn Fire Insurance Maps from the early part of the 20th century depict an emerging industrial area with a few wooden and temporary dwellings lining the historic shoreline of Port Gardner Bay. No information was found to suggest the Property was used as a formal dump/sanitary landfill that was accepting municipal refuse or trash from a wider geography.

3.0 PREVIOUS SITE INVESTIGATIONS AND INTERIM REMEDIAL ACTIONS

This section summarizes previous investigations and interim remedial activities undertaken at the Property and vicinity since 1985. From 1985 to 2009, extensive and focused investigations were undertaken by various consultants at the Property and off the Property. These investigations included drilling soil borings, installation of monitoring wells, test pit excavations, and collection and analytical testing of soil and groundwater samples. In addition, several interim remedial activities, including installation of LPH recovery trenches, manual LPH recovery, and capping the Property, have been conducted at the Property since 1988. Table 1 provides a chronology of previous investigations and interim remedial activities conducted at the Property and vicinity. Figure 15 shows the locations of historical explorations conducted on- and off-Property. Analytical data from previous investigations have been compiled by Ecology into a project database.

3.1 Previous Environmental Investigations Conducted at the Site for Soil and Groundwater

A chronology of subsurface investigation activities conducted at the Property and surrounding area is presented below and in Table 1. Soil boring, test pit, and monitoring well logs are provided in Appendix C. A summary of current environmental conditions for soil and groundwater is presented in Sections 6.1 and 6.2, respectively.

In May 1985, RZA advanced five soil borings, B-1 through B-5, at the ExxonMobil Parcel. The borings were advanced using a hollow-stem auger (HSA) drill rig to depths ranging from 8.4 to 19 feet bgs. The borings were completed as 2-inch-diameter monitoring wells. No soil or groundwater samples were collected during this investigation. The monitoring wells B-1 through B-5 were named MW-1 through MW-5 in several later reports. RZA reported that petroleum odor was noticed in most of the borings, and evidence of contamination was also apparent below the water table. Specifically, petroleum odor or sheen on groundwater was observed in monitoring wells B-1, B-2, B-4, and B-5 (RZA, 1985).

In March 1988, RZA advanced 13 borings throughout the ExxonMobil Parcel to a depth of 11.5 feet bgs. The borings were completed as monitoring wells MW-6 through MW-18. RZA collected soil samples from the borings and groundwater samples from the monitoring wells. After monitoring well installation, 1.29 feet of LPH was measured in MW-14.

In January 1990, Environmental Science and Engineering, Inc. (ESE) advanced 19 hand-auger borings, AD-01 though AD-19, throughout the ADC Parcel to depths ranging from 1 to 4.5 feet bgs and collected soil samples from the borings.

In February 1990, ESE advanced seven HSA borings, W-1 through W-7, on and surrounding the ADC Parcel. Soil borings W-1 through W-6 were each advanced to a depth of 23 feet bgs and completed as 2-inch-diameter monitoring wells. Soil boring W-7 was advanced to the depth of 16 feet bgs and backfilled with bentonite upon completion. In June 1990, ESE advanced 10 hand-auger borings, including W-8 through W-17, to depths ranging from 6 to 10 feet. AMEC

was unable to identify soil analytical data for W-8 through W-17. However, gauging data indicate that free product was observed in 10 of the 17 monitoring wells located at and around the ADC Parcel. ESE suggested that a possible source for some LPH could be a railroad loading rack formerly located east of the ADC Parcel.

In October 1990, RZA collected grid soil samples B-1 through B-25 from the ExxonMobil Parcel using a hand auger. Soil samples were collected from depths ranging from 0.5 to 3 feet bgs. Two samples were studied for the purpose of conducting a slurry bio-feasibility study. Rapid biodegradation of total petroleum hydrocarbons (TPH) in the gasoline range (TPH-G) was observed. Biodegradation of TPH (undifferentiated) was not achieved.

Sometime prior to November 1990, monitoring wells B-3 (MW-3), B-4 (MW-4), and MW-7 were destroyed. AMEC was unable to locate records regarding well decommissioning.

In March 1991, RZA advanced six percussion soil borings to depths ranging from 5 to 5.5 feet bgs and installed 2-inch-diameter shallow monitoring wells MW-19 through MW-24. Wells MW-19, MW-20, and MW-21 were installed to the west of the ExxonMobil Parcel, and wells MW-22, MW-23, and MW-24 were installed at the possible source of free product at the railroad loading rack, to the east of the ADC Parcel. In June 1991, RZA installed two shallow 2-inch-diameter monitoring wells MW-25 and MW-26 on the west side of Federal Avenue. Because monitoring wells MW-25 and MW-26 were found to be either inaccessible or dry and no groundwater samples were collected, the wells were renamed as soil borings B-25 and B-26. On June 20, 1991, RZA installed four 4-inch-diameter monitoring wells MW-27, MW-28, MW-29, and MW-30, each to a depth of 13.5 feet bgs. These monitoring wells were installed to the east of the ADC Parcel. In addition, in June 1991, RZA advanced soil boring B-21-91 to a depth of 29 feet bgs along the eastern boundary of the ADC Parcel. This boring was backfilled with bentonite.

In November 1991, RZA AGRA installed an 8-inch-diameter recovery well, RW-2, and advanced soil boring B-1A to a depth of 31 feet bgs and soil borings B-8A and B-15A to depths of 29 feet bgs. Soil borings B-1A, B-8A, and B-15A were advanced in the vicinity of the existing monitoring wells B-1, MW-8, and MW-15. No soil analytical data for this drilling event were found.

In December 1993, RZA AGRA advanced seven off-Property borings MW-31 through MW-37 and completed six of the borings as 2-inch-diameter monitoring wells screened from 5 to 15 feet bgs. Soil boring MW-33 was advanced to 29 feet bgs and then backfilled up to 15 feet bgs. Soil boring B-34 was drilled and sampled but no well was installed at that location. Monitoring wells MW-31, MW-32, and MW-33 were installed to the west of the ExxonMobil Parcel, across Federal Avenue. A groundwater monitoring event followed monitoring well installation activities. Well B-1, MW-27, and MW-29 contained LPH and were not sampled. In addition, a ground-penetrating radar (GPR) survey was conducted to assess whether underground product lines had been removed. The GPR survey did not identify any linear subsurface features.

In December 1993, RZA AGRA excavated five test pits (TP-1 through TP-5) to depths ranging from 3 to 3.5 feet bgs. The test pits were associated with installation of a recovery trench along the western border of the ExxonMobil Parcel. Monitoring well MW-21 was decommissioned

during the recovery trench installation activities. However, the project database contains analytical results from 2002 for samples identified as originating from MW-21. These database entries may have been incorrectly identified.

In July 1995, RZA AGRA gauged monitoring wells located on the ADC Parcel. Wells W-9, W-12, and W-13 contained LPH.

RZA AGRA conducted a groundwater monitoring event in December 1995. Recovery well RW-2 and monitoring wells B-2, MW-8, MW-9, MW-18, MW-15 through MW-18, MW-27, and MW-28 were gauged. Wells RW-2, MW-9, MW-18, and MW-28 contained LPH and were not sampled.

In March 1996, AGRA advanced 13 push-probe soil borings, GP-1 through GP-13, to depths ranging from 9.5 to 12 feet bgs. These explorations were located generally to the north of the ADC Parcel and were associated with the CSO line repair (see Table 1). Soil samples were collected from the borings. No groundwater samples were collected from temporary screens installed in borings. Soil samples indicated that soil surrounding the damaged portion of the CSO line was impacted with petroleum hydrocarbons. LPH was also observed to accumulate in the temporary wells.

In May 1996, AGRA advanced 14 bobcat borings, BB-1 through BB-14, to depths ranging from 3 to 4 feet bgs at the ADC Parcel and collected soil samples. In addition, seven test pits (TP-1-96 through TP-7-96) were excavated throughout the ADC/Miller Parcel to depths ranging from 1.5 to 6 feet.

On June 5, 1996, AGRA advanced borings VRW-1 and MW-38 to depths of 15 feet bgs and 12.5 feet bgs, respectively, on the northeast corner of the Property. The borings were completed as 4-inch-diameter recovery well VRW-1 and 2-inch-diameter monitoring well MW-38. AGRA gauged wells in August 1996. LPH was found in B-1, VRW-1, MW-27, MW-29, MW-30, MW-38, W-1, W-9, and W-15.

Between November 1997 and January 1998, on behalf of Chevron, Texaco, KC, and BNSF, Pacific Environmental Group, Inc. (PEG), conducted an environmental investigation in the vicinity of several former petroleum bulk plants adjacent to the north and northwest of the Property. PEG advanced 15 soil borings using a hand-auger (Probe-1) and direct-push technology (Probe-2 through Probe-15) to depths ranging from 4 to 13 feet bgs. Borings Probe-7 to Probe-12 were advanced in the vicinity of the CSO line. PEG also advanced two soil borings inside the KC warehouse to depths of 16.5 feet bgs using a HSA drill rig and completed the borings as 2-inch-diameter monitoring wells, KC-1 and KC-2. Monitoring wells KC-1 and KC-2 were screened from 2 to 10 feet bgs and from 1.5 to 11.5 bgs, respectively. PEG submitted three soil samples to the analytical laboratory collected from borings Probe-7, Probe-11, and KC-1 at depths ranging from 3 to 8.5 feet bgs. Groundwater samples were collected from temporary screens installed in each probe (with the exception of Probe-1) and from the two monitoring wells KC-1 and KC-2. During drilling, PEG did not identify LPH in soil borings or monitoring wells. Detected concentrations of TPH-G, TPH in the diesel (TPH-D) and oil (TPH-O) ranges, and toluene in soil samples did not exceed MTCA Method A cleanup levels. Concentrations of TPH-D and TPH-O were detected above MTCA Method A cleanup levels in

groundwater samples collected from Probe-7 and Probe-11 (nearest to CSO line). Concentrations of TPH-O were also detected above MTCA Method A cleanup levels in groundwater samples collected from Probes 13 and -14. Concentrations of TPH-G, benzene, toluene, ethylbenzene, and xylenes (BTEX) were either below the laboratory detection limits or below the MTCA Method A cleanup levels in all groundwater samples. No soil samples were collected in the vicinity of the four ASTs formerly located at the Associated Oil Company property, which was located approximately 400 feet north of the ADC Parcel. One groundwater sample that was collected in the vicinity of the former Associated Fuel Tank Farm (Probe 4) had concentrations of TPH-D, TPH-G, and BTEX below the MTCA Method A cleanup levels. The PEG report (PEG, 1998) is included in Appendix D.

Between November and December 1998, the following groundwater monitoring wells were abandoned: MW-6, MW-8, MW-9, MW-12, MW-13, MW-15, MW-16, MW-17, MW-38, WP-1, B-1, B-2, W-4, W-8, W-11, W-12, W-14, AD-11, AD-12, AD-13, AD-15, AD-19, W-10, W-15, and MW-40. The well abandonment activities were associated with an interim remedial action conducted at the Property in January 1999, which included construction of an interceptor trench along the western and northern boundaries of the Property and a low-permeability cap over the entire Property (Table 1). In addition, nine 4-inch-diameter LPH recovery wells (LPH-1 through LPH-9) were installed in the interceptor trench in January 1999. A storm collection system that connects to the City of Everett sewer system was installed at the Property as part of the cap.

Three monitoring wells (W-10R, W-15R, and MW-40R) were installed on October 1, 1999, to replace abandoned wells W-10, W-15, and MW-40. The monitoring wells were screened from 4 to 14 feet bgs.

In December 1999, Dames and Moore performed geotechnical investigations associated with the California Street Overcrossing (CSTO) Project located at the intersection of California Street and Federal Avenue. Soil samples were collected for petroleum hydrocarbon analyses from borings DM-6, DM-7, and DM-8 located south and southeast of the Property. In September 2000, URS performed a Phase II investigation for the CSTO Project. Push-probe borings UG-1 to UG-12 (originally labeled GP-1 through GP-12) were advanced to the east and south of the Property to collect soil samples. Groundwater samples were collected from temporary screens installed in UG-2 and UG-8 (URS, 2000a).

Petroleum-affected soils along the overcrossing alignment extended from the west side of California Street to the middle of the KC parking lot. The contamination was found to be present generally from 4 to 5 feet bgs. The petroleum-affected soils extended over an area of approximately 25,600 square feet and on average were approximately 8 feet thick. Thus, approximately 7,600 cubic yards of petroleum-contaminated soil (PCS) was calculated to be present along the overcrossing alignment (URS, 2000a).

In July 2001, URS conducted a Phase II investigation on the Johnston Petroleum property adjacent to the south boundary of the ExxonMobil Parcel. URS advanced seven push-probe borings (JP-1 through JP-7) at the Johnston Petroleum parcel and collected soil samples. In addition, groundwater samples were collected from temporary screens installed in JP-1, JP-4, and JP-7. No TPH fractions or BTEX were detected above MTCA Method A cleanup levels in

the soil samples. The grab groundwater sample collected from JP-1 contained TPH-D and TPH-O above MTCA Method A cleanup levels. No TPH-G or BTEX was detected in groundwater samples collected within the Johnston Petroleum parcel (URS, 2001).

In February 2002, Environmental Resolutions, Inc. (ERI) abandoned monitoring wells MW-22, MW-23, MW-24, MW-35, and MW-37 and piezometer DM-6 due to the proximity of the CSTO construction project. Abandoned monitoring wells MW-22 through MW-24 were reported to be 5 feet deep, monitoring wells MW-35 and MW-37 were 15 feet deep, and piezometer DM-6 was 53 feet deep. ERI re-installed monitoring well W-2. Reportedly, well W-2 was screened from 3 to 23 feet bgs. No soil samples were collected during well installation activities. In addition, in July 2002 ERI abandoned shallow monitoring wells MW-20, MW-21, and an unidentified well located south of MW-21. The reported abandonment of MW-21 in 2002 contradicts the reported decommissioning of MW-21 due to installation of the recovery trench to the west of the Property in December 1995.

Since 2002, monthly water level gauging of monitoring wells at the Site; manual LPH removal from monitoring wells where more than 0.02-foot of LPH was detected; oleophilic sock installation and replacement in wells with LPH accumulations; and quarterly groundwater monitoring have been conducted at the Site by Kleinfelder, ERI, and most recently AMEC. The ongoing groundwater monitoring activities are being conducted pursuant to the groundwater monitoring program included in the 1998 Agreed Order (DE98TCP-N-223). The ongoing groundwater monitoring program is described in detail in Section 4.0.

In February 2007, AMEC contracted Bravo Environmental of Kenmore, Washington, to conduct a video survey of the storm drain system that connects to the City of Everett sewer system installed at the Property by Kleinfelder, Inc. (Kleinfelder), in 1999 as part of interim remedial measure (Section 3.2.6). The purpose of the video survey was to verify that groundwater from the Property is not infiltrating into the stormwater system through possible cracks and fissures in the piping and seven catch basins. No significant cracks or fissures within the storm water system were observed during the 2007 video survey.

In 2007, the frequency of groundwater monitoring was reduced to semiannual. In 2008, AMEC installed two additional off-Property wells (MW-A1 and MW-A2) along the west side of Federal Avenue (AMEC, 2008a) and performed a tidal study (AMEC, 2008b). On June 3, 2008, recovery wells LPH-1 through LPH-9 and monitoring wells W-1, W-2, W-3, W-6, W-10R, MW-10, MW-11, W-15R, W-17, RW-2, MW-19, MW-27, MW-28, MW-29, MW-30, MW-40R, and MW-A1 and MW-A2 were surveyed by a professional surveyor.

An investigation along a proposed City of Everett utility alignment adjacent to the perimeter of the Property was undertaken in February 2010. A copy of the SAP Addendum that addresses the activities associated with the investigation is provided in Appendix E.

3.2 Interim Remedial Actions

Interim remedial actions and testing at the Property have included groundwater extraction and treatment, recovery trench installation, soil vapor extraction (SVE), excavation, manual LPH

recovery, LPH vacuum recovery, excavation dewatering, interceptor trench installation along the western and northern Property boundaries, and installation of a low-permeability cap over the entire Property. This section provides a brief description of each of the interim remedial actions.

3.2.1 Infiltration Gallery in Vicinity of MW-14

LPH at a depth of 1.29 feet was observed in monitoring well MW-14 in April 1988. At that time, RZA evaluated the feasibility of extracting LPH beneath the ExxonMobil Parcel by installing a recovery trench, vapor extraction system, and groundwater treatment system consisting of an oil/water separator coupled with an air stripper. In May 1988, an infiltration gallery was installed in the vicinity of MW-14. The infiltration gallery was "T"-shaped and approximately 45 feet long. Construction activities consisted of trench excavation and installation of two modified 55-gallon drums as sumps. The trench was subsequently filled with 1.5–inch-diameter washed gravel with 8 to 12 inches of surrounding ground surface (removed in 1999). On May 12, 1988, a vacuum truck pumped subsurface fluids from the sumps; 1,400 gallons of liquid was removed from the sumps, approximately 50 gallons of which was LPH. As a result of this interim remedial action, the LPH thickness in MW-14 decreased to 0.40 feet in August 1988.

3.2.2 Groundwater Extraction and Treatment

In March 1989, an automated groundwater extraction and treatment system was installed by RZA in the location of the May 1988 infiltration gallery. The system consisted of a fluid extraction sump situated in RW-1 (formerly MW-14), an oil—water separator, an air stripper, and a re-infiltration gallery. The re-infiltration gallery, which was approximately 100 feet long, was constructed parallel to the north side of the ExxonMobil Parcel. It consisted of a perforated, 4-inch-diameter polyvinyl chloride (PVC) pipe surrounded by pea gravel within the excavated trench. The groundwater extraction and treatment system operated at a pumping rate of approximately 2 to 3 gallons per minute (gpm). However, no measurable quantities of LPH were removed, and no LPH was observed in recovery well RW-1. In August 1989, 0.68 and 0.73 feet of LPH was measured in MW-8 and MW-18, respectively. Approximately 7 gallons of free product and oily water were hand bailed from both wells and disposed of in the oil—water separator of the groundwater treatment system at the Property. The groundwater extraction and treatment system was shut down in March 1990 because of flooding of the re-infiltration gallery and has not been restarted.

3.2.3 Recovery Trench In the Vicinity of Side Sewer

In December 1993, an LPH recovery trench was installed on the southwest corner of the ExxonMobil Parcel. The trench was installed in a north-south orientation, to a depth of approximately 4 feet bgs. Two recovery wells that consisted of 8-inch-diameter, schedule 40 PVC screens were placed to a depth of approximately 7 feet in the trench. The trench was backfilled with 7/8-inch-diameter round rock to a depth of approximately 3 feet. The rock was overlain by a filter fabric and covered with compacted pit run, followed by placement of approximately 6 inches of crushed rock over the pit run to bring the excavation to grade. Concrete vaults were then placed over the recovery wells. Underground PVC piping was extended from the vaults to the remediation equipment compound located on the ExxonMobil

Parcel for future access to LPH recovery equipment. Soil excavated during construction was stockpiled on the Property, covered with visqueen, and later disposed of at an external facility.

No LPH accumulated in the recovery trench, and no LPH was recovered from the trench. The trench was re-examined in August 1996; no LPH accumulation was evident.

3.2.4 Combined Sewer Overflow Line Repair

In October 1995, discharge of petroleum product into Everett Harbor from a CSO line prompted an investigation by the U.S. Coast Guard (USCG) Puget Sound Marine Safety Office and the City of Everett to assess the source of the hydrocarbons. The outfall is located on the west side of the 2700 block of Federal Avenue, approximately 175 yards northwest of the ADC Parcel. Camera surveys of the sewer lines that flow to the outfall revealed LPH seepage in the section of the CSO line that runs approximately 40 feet north of the northern boundary of the ADC Parcel. The section of pipe in which the infiltration was observed during the camera survey was discovered to be made of clay tiles that had settled and cracked. On April 16, 1996, a meeting was held at the City of Everett to discuss options for repairing the broken section of the CSO line. The repair option selected at the meeting consisted of replacement of the settled portion of the line and slip lining of the remaining portion of the line.

In June 1996, AGRA began repair activities on the CSO line. The settled portion of the pipe, approximately 25 feet long, was excavated and replaced. Another section of pipe, which was approximately 20 feet long and made of metal, was found to be corroded and out of round. This section of pipe was also excavated and replaced. The excavation to repair the CSO line in this area was approximately 125 feet long. The remaining portions of the CSO line were slip-lined to eliminate the potential for leakage of LPH through the joints of the intact sections of the existing pipe. During the excavation activities, LPH was observed entering the excavation from the wood waste layer where this layer intercepted both the north and south sidewalls. Three 36-inchdiameter, 22-foot-deep dewatering wells (DW-1 through DW-3) were installed prior to excavation of the CSO line. Dewatering was performed throughout the excavation to allow for repair of the CSO line. Throughout construction, pumps operated alternately, both within the CSO line excavation and within the three dewatering wells. The recovered liquid was transferred to an 18,000-gallon baffled tank, then to two 21,000-gallon settling tanks, and finally to an 18,000-gallon baffled tank. Reportedly 1,450,800 gallons of groundwater and 23,050 gallons of LPH were removed during CSO line excavation dewatering activities. During repair of the CSO line, daily LPH recovery volumes varied from 0 gallons to 7,550 gallons. Approximately 80 percent of the total LPH recovered was removed in the first 6 days of CSO line excavation dewatering.

Oleophilic sorbent booms were installed to absorb and contain LPH discharging into Port Gardner Bay. During CSO excavation and repair activities, sorbent pads, oil sweeps, and/or soil snares, sorbent booms, and a mechanical skimmer were used to contain and recover the floating petroleum to the extent practicable.

3.2.5 LPH Vacuum Recovery Pilot Test

In May and June 1996, AGRA conducted an LPH recovery pilot test at the Property. The recovery system consisted of SVE and groundwater/LPH pumping systems installed on the newly installed 4-inch vacuum recovery well (VRW-1) located in the northeast corner of the ADC Parcel. The SVE system discharged directly to the atmosphere, while the groundwater/LPH pumping system transferred the extracted liquid to a 500-gallon LPH settling tank, then to a 6,900-gallon groundwater storage tank. The test was performed for 14 days. During that time, approximately 125 gallons of LPH and 28,228 gallons of groundwater were removed from VRW-1. AGRA concluded that overall efficiency of LPH recovery during the test was 0.43 percent. Daily LPH removal rates could not be measured during the test because of emulsification of LPH with groundwater. LPH thickness in VRW-1 decreased from 9.41 feet to no measurable thickness in 14 days. LPH in MW-38 (observation well) decreased slightly, however, LPH thickness and water levels varied significantly throughout the 14 days of testing. AGRA concluded that the variability of groundwater levels in MW-38 may indicate that this area of the Property is tidally influenced. The thickness of LPH was measured in VRW-1 and MW-38 a month after the recovery pilot testing. Wells VRW-1 and MW-38 contained 1.35 and 0.29 feet of LPH, respectively.

In addition, LPH was removed with a vacuum truck from a test pit (TP-6-96) in May 1996. LPH did not recharge into test pit TP-6-96 during a 2-week period, and no additional LPH was removed. Ecology has since agreed that active removal of LPH is not a viable technology.

3.2.6 Water Management and Treatment System and Asphalt Cap Construction

In February 1997, PTI prepared a memorandum summarizing environmental investigations, LPH recovery activities, and geology of the Site and vicinity (PTI, 1997a). The memorandum stated that long-term, passive (LPH only) recovery was effective in removing LPH. The memorandum also stated that active LPH and groundwater recovery that had been performed up to that time had been effective for short durations, but recovery structures did not continue to recover LPH for extended periods of time when active recovery was employed.

In July 1998, on behalf of Mobil Oil Corporation, ADC, and Mr. A. P. Miller, Exponent prepared a Remedial Investigation and Focused Feasibility Study for the Property (Exponent 1998a). In this study, Exponent summarized the history of the Property and evaluated feasible remedial options for the Site. To achieve the remedial objective, Exponent recommended the installation of LPH recovery trenches and a low-permeability cap over the Property.

In November 1998, Kleinfelder completed an initial survey evaluation of the Property. Kleinfelder also performed an asbestos survey prior to demolition of structures on the Property. Asbestos was found to be present in buildings on the Property, and asbestos abatement was conducted by Performance Abatement Services between November 12 and 17, 1998. Demolition activities at the Property were completed in January 1999. Structures that were demolished on the ADC Parcel included four buildings (an office building, oil pump house building, a warehouse, and boiler room), aboveground piping, loading racks, the firewall (including 40 feet of foundation of the wall in the northeast corner of the Property), and the AST pad. In addition, a trench that was

installed in 1988 in the vicinity of MW-14/RW-1 was demolished. Two modified 55-gallon drums that had been used as sumps were filled with concrete.

Kleinfelder conducted interim remedial actions at the Property from the end of 1998 throughout 1999. These actions consisted of monitoring well abandonment, clearing and grubbing of the ExxonMobil Parcel, demolition of structures on the ADC Parcel, demolition of the firewall on the ADC Parcel, construction of an interceptor trench, abandonment of underground utilities, installation of a downgradient liner and LPH collection piping, installation of a low-permeability cap, and installation of a storm drain system. Demolition activities at the Property were completed in January 1999.

Approximately 162 tons of contaminated shallow soil and vegetation were removed from within the ADC firewall area that was situated on the northern portion of the ADC Parcel surrounding the former ASTs. The soil was disposed of at TPS Technologies in Lakewood, Washington. Approximately 3.5 tons of Class 3 PCS was taken to CRS Associated located in Everett, Washington. Marine Services, Inc., removed 110 gallons of purge water for recycling at an external facility.

Between December 1998 and September 1999, the water management and treatment system constructed at the Property in 1998 treated approximately 2.5 million gallons of water from the Property. The water was treated using an oil—water separator, a settling tank, and a carbon polishing unit. The water then discharged via the storm sewer system to the Everett Water Pollution Control Facility, in accordance with project-specific City of Everett Industrial Waste Discharge Permit No. 154. Approximately 19,900 gallons of oily water and 450 gallons of sludge were collected at the Property between December 1998 and September 1999. Sources of oily water included recovered product from underground pipes prior to removal; water from tank washing prior to removal; water skimmed from excavated areas during interceptor trench construction; and water skimmed from the water treatment system product overflow and flow equalization tanks.

From August to September 1999, cap construction activities were performed and included complete grading of the Property, installation of two layers of geotextile fabric along the entire trench, installation of asphalt-treated base material and paving fabric, and installation of the asphalt cap.

In January 1999, an interceptor trench was constructed along the western and northern Property boundaries. The trench utilized the existing concrete footing structure that is 7 feet deep with an impermeable liner placed over the downgradient side of the trench contiguous with the footing. The trench was backfilled with uniform washed gravel and was constructed to the current grade. Lateral piping and vaults were installed during construction of the Property cover in September 1999. Nine 4-inch-diameter LPH recovery wells (LPH-1 through LPH-9) were installed in the trench.

3.2.7 LPH Bailing and Groundwater Monitoring

Manual bailing of LPH from wells that contain a measurable amount of LPH has been performed on a daily, weekly, and later on a monthly basis since December 1991. LPH recovery activities currently conducted at the Property are based on the groundwater monitoring program included in Ecology's 1998 Agreed Order (DE98TCP-N-223).

The current monthly LPH monitoring consists of water level gauging of nine recovery wells (LPH-1 through LPH-9) and 16 monitoring wells (W-1, W-2, W-3, W-6, MW-10, W-10R, MW-11, W-15R, W-17, MW-18, MW-19, MW-27, MW-28, MW-29, MW-30, MW-40R), LPH removal from select monitoring wells, and replacement of oleophilic socks in wells with measurable accumulations of LPH. More details on the ongoing LPH recovery program are provided in Section 4.0.

3.2.8 Puget Sound Outfall 5 Overflow Structure Project

In July 2008, on behalf of the City of Everett Utilities Department, Floyd | Snider collected soil and water samples from an excavation at the CSO Puget Sound Outfall 5 (PSO 5) Overflow Structure (Figure 15). The overflow structure was built to control overflows from the CSO into Puget Sound. The project was located to the north-northeast of the Property. Water samples were analyzed during excavation dewatering to verify that water discharged to the City sewer system met the requirements of the City's industrial pretreatment requirements. Soil samples were collected to characterize soils for disposal. Soil samples were screened in the field. Soil samples that exhibited signs of contamination were not sampled, but instead disposed of under a Class III soil profile. Apparently clean soil samples were sampled per disposal specifications and disposed of as Class II soils. Appendix B contains the City of Everett's letter to Ecology and analytical data. The locations and depths of contaminated soil were not identified by Floyd | Snider or the City of Everett.

4.0 ONGOING GROUNDWATER MONITORING/PETROLEUM RECOVERY

Periodic groundwater monitoring has been conducted at the Site since the early 1990s and became regular in 2002, pursuant to the groundwater monitoring program included in Ecology's 1998 Agreed Order (DE98TCP-N-223). The monitoring program includes (1) petroleum recovery and (2) collection and analytical testing of groundwater samples. The groundwater samples were collected on the quarterly basis and the LPH recovery was conducted monthly. In 2007, the groundwater monitoring frequency was reduced to semiannual.

4.1 Petroleum Recovery

Manual bailing of LPH from wells that contain measurable accumulations of LPH has been performed on a daily, weekly, or monthly basis since December 1991. The current LPH monitoring program is performed monthly and consists of:

- Water level gauging of nine recovery wells (LPH-1 through LPH-9) and 16 monitoring wells (W-1, W-2, W-3, W-6, MW-10, W-10R, MW-11, W-15R, W-17, MW-18, MW-19, MW-27, MW-28, MW-29, MW-30, MW-40R),
- LPH removal from monitoring wells where more than 0.02 foot of LPH is detected, and
- Replacement of oleophilic socks in wells with measurable accumulations of LPH.

LPH gauging during the most recent semiannual groundwater monitoring event conducted in February 2009 produced the following results.

- The thickness of LPH in LPH-9 fluctuates from no detectable LPH to 0.16 feet.
- The thickness of LPH in W-1 fluctuates from 0.06 to 0.93 feet.
- The thickness of LPH in W-2 fluctuates from no detectable LPH to 0.75 feet.
- The thickness of LPH in MW-29 remains greater than 1 foot.

The average thickness of LPH measured from September 2008 to February 2009 during monthly monitoring events is shown on Figure 20.

4.2 Monitoring of Groundwater Quality

From 2002 to 2007, groundwater samples were collected quarterly from five monitoring wells: MW-11, MW-19, MW-40R, W-3, and W-6. In 2007, the frequency of groundwater monitoring was reduced from quarterly to semiannually. This change in the frequency of groundwater monitoring was verbally accepted by Ecology in February 2007 and verified in a letter dated May 8, 2007. The accepted revised groundwater monitoring schedule was confirmed in a meeting with Ecology on August 8, 2007. Two off-Property monitoring wells (MW-A1 and MW-A2) installed in 2008 are also included in the groundwater gauging and monitoring network.

Groundwater samples are collected using a peristaltic pump and dedicated disposable tubing. The purge water is monitored for field water quality parameters (temperature, pH, specific

conductivity, turbidity, dissolved oxygen, and oxidation-reduction potential) recorded at 5-minute intervals using a Horiba U-22 water quality meter.

Groundwater samples are submitted to Test America Laboratories in Bothell, Washington, for the following analyses:

- TPH-G using Ecology Method Northwest Total Petroleum Hydrocarbons-Gasoline extended (NWTPH-Gx);
- TPH-D and TPH-O using Ecology Method Northwest Total Petroleum Hydrocarbons-Diesel extended (NWTPH-Dx); and
- BTEX using U.S. Environmental Protection Agency (EPA) Method 8020.

The February 2009 groundwater monitoring results produced the following findings.

- The direction of the hydraulic gradient is toward the west to northwest.
- Groundwater samples from monitoring wells MW-11, MW-19, MW-A1, MW-A2, W-3, and W-6, contained concentrations of BTEX below the analytical detection limits. MW-40R contained BTEX concentrations at detectable levels but below MTCA Method A cleanup levels. Concentrations of TPH-G were detected in MW-19, MW-40R, MW-A1, MW-A2, W-3, and W-6. Groundwater from MW-40R contained a TPH-G concentration that exceeded MTCA Method A cleanup levels.
- TPH-D and TPH-O were detected in groundwater samples from monitoring wells MW-19, MW-40R, MW-A1, MW-A2, W-3, and W-6. TPH-D concentrations in all the above wells were above MTCA Method A cleanup levels except monitoring well W-6. TPH-O was detected in the same well set and concentrations only exceeded MTCA Method A cleanup levels in monitoring well MW-40R.
- Groundwater samples from monitoring well MW-11 did not contain analytes at concentrations above the laboratory detection limits.

Analytical results for the August 2008 and February 2009 monitoring events are presented on Figure 21. Analytical results from groundwater monitoring are discussed in detail in Section 6.3

5.0 PRELIMINARY SCREENING LEVELS

This section was prepared consistent with Ecology MTCA cleanup rules (WAC 173-340) and establishes preliminary screening levels for soil and groundwater. Based on the data collected during the Data Gap Investigations and remedy selection criteria under MTCA, the site-specific cleanup levels and, if necessary, remediation levels will be established.

5.1 Preliminary Soil Screening Levels

The applicable MTCA Method A and/or MTCA Method B soil cleanup levels (WAC 173-340-700) are presented along with analytical results for indicator hazardous substances (IHSs) in soil in Tables 2 through 4. Petroleum constituents have been identified in soil samples located off-Property, and therefore MTCA Method A cleanup levels for residential/unrestricted land use will serve as preliminary screening levels for total petroleum hydrocarbons BTEX and carcinogenic polycyclic aromatic hydrocarbons (cPAHs). MTCA Method A cleanup levels for industrial land use will be used as preliminary screening levels for lead since the Property will remain in industrial use for the foreseeable future and existing concentrations of lead in groundwater are below its screening level. Noncarcinogenic polycyclic aromatic hydrocarbons (PAHs) were compared to MTCA Method B residential/unrestricted cleanup levels.

The MTCA Method A unrestricted and industrial (applicable to lead only) land use were selected as preliminary screening levels based on the following considerations: (1) levels protective of human health and the environment for direct contact, inhalation, and ingestion; and (2) levels protective of groundwater. In addition, soil concentrations considered protective of terrestrial receptors (plants and animals) were assessed using a simplified terrestrial ecological evaluation (WAC 173-340-7492). A copy of the evaluation is presented in Appendix F.

5.2 Preliminary Groundwater Screening Levels

The applicable MTCA Method A and/or MTCA Method B groundwater screening levels (WAC 173-340-720) are presented along with analytical results for IHSs in groundwater in Tables 5 through 7. Although the groundwater on the Site is not currently used for potable purposes, preliminary screening criteria for the Site will be established for use of groundwater as potable water. However, based on the historical and current industrial use of properties surrounding the Property, it is not likely that groundwater at the Site could potentially be a future source of drinking water (WAC 173-340-720(2)(c) and (d). The groundwater to surface water pathway will be evaluated as part of the FFS after the data gaps investigation. In the event that IHS's are in contact with surface water, screening criteria will be re-evaluated for groundwater. If it is determined that surface water is not impacted then groundwater will be evaluated in the context of partition since groundwater is considered non-potable. This screening criterion will be based on a MTCATPH calculated value for TPH and Method B or C for other components.

6.0 SUMMARY OF CURRENT ENVIRONMENTAL SITE CONDITIONS

This section summarizes environmental conditions for soil and groundwater at the Property and vicinity, based on results of historical and recent investigations. Soil samples for chemical analyses have been collected from soil borings, test pits, and trench and test pit excavations on the Property and in the vicinity of the Property. Groundwater samples for chemical analyses have been collected from temporary wells and groundwater monitoring and recovery wells. Analytical results of the soil and groundwater samples indicate that heavy-range petroleum hydrocarbons are distributed in soil and groundwater across the Property and vicinity. LPH has been observed in the soil and floating on the water table. TPH-G, BTEX, PAHs, and lead have also been reported to be present in soil and groundwater samples.

Soil and groundwater data collected at the Site since 1988 were imported into a Microsoft Access database and will ultimately be put into the Ecology EIM system. Analytical results for soil samples are presented in Tables 2 through 4. Analytical results for groundwater samples are presented in Tables 5 through 7.

The concentrations of detected chemicals in groundwater are compared against the MTCA Method A cleanup levels for groundwater (drinking water-based). The concentrations of selected PAH compounds with no established MTCA Method A cleanup level are screened against MTCA Method B cleanup levels (Table 7).

6.1 Soil

The general geology, based on the previous subsurface investigations conducted at the Property and its surroundings, is described in Section 2.4.2. Soil boring, monitoring well, and test pit logs are compiled in Appendix C. The stratigraphy underlying the Site is displayed on geologic cross-sections A-A', B-B', and C-C', which are presented on Figures 16 though 18, respectively. The locations of the cross sections are shown on Figure 15.

The thickness and continuation of the silt/clay layer was not completely assessed during previous subsurface investigations. Below is the list of deeper borings drilled in the area that encountered Quaternary-aged transitional beds in the borings. Boring locations are shown on Figure 15.

- B-21 was drilled to 29 feet bgs by RZA in 1991. No silt/clay was encountered to the total depth of the boring. Native sand was encountered at 27 feet bgs.
- MW-33 was drilled to 29 feet bgs. The silt/clay layer was encountered at 25 feet bgs and continued to the total depth of the boring.
- W-2, W-3, and W-6 were drilled to 23 feet bgs. Organic silt (silt/clay) was recorded in each boring at 20 feet bgs and extended to the total depths of the borings.
- B-1A and B-15A were drilled to 30 and 29 feet bgs, respectively. No silt/clay layer was encountered in either boring.

 MW-A1 and MW-A2 were drilled to 26.5 feet bgs. An organic silt/clay layer was encountered from 23 to 25 feet bgs in MW-1A and from 17.5 to 21 feet bgs in MW-2A. In both borings, the layer of silt/clay is underlain by native sand.

Analytical results for soil samples are presented in Tables 2 through 4. The concentrations of detected chemicals in soil reported in Table 2 through 4 are compared with MTCA Method A soil cleanup levels (see Section 5.1). The concentrations of selected PAH compounds presented in Table 4 with no established MTCA Method A soil cleanup level were compared instead with MTCA Method B cleanup levels.

Soil samples have been collected at the Site at various depths and analyzed for the following:

- Petroleum hydrocarbons by EPA Method 8015 Modified and/or 418.1 and Ecology Methods NWTPH-D, NWTPH-Dx, and NWTPH-Gx;
- Oil and grease by EPA Method 413;
- BTEX by EPA Method 8020;
- Semivolatile organic compounds (SVOCs) by EPA Method 8310; and
- Lead by EPA Method 7421.

The majority of the analyzed soil samples were collected from above the water table and/or at the capillary fringe at approximate depths ranging from 0 to 5 feet bgs. Approximately one-third of the analyzed samples were collected at depths ranging from 5 to 14 feet bgs. However, the extent of petroleum contamination (odor and/or discoloration) in soil was evident in several borings to depths of up to approximately 16 feet bgs.

The following subsections summarize the current environmental conditions at the Site for each IHS identified in Section 7.4.

6.1.1 TPH-D, TPH-O, and TPH (undifferentiated)

Soil analytical data for TPH-D, TPH-O, and TPH (undifferentiated) are displayed on Table 2. In this discussion, analytical results for undifferentiated TPH are assumed to be representative of TPH-D, since predominantly diesel-range hydrocarbons have been detected at the Site. The horizontal and vertical distributions of TPH-D and TPH (undifferentiated) in soil are shown on Figures 22 through 25. TPH-D has been found in soil samples collected throughout the Property and adjoining parcels, but not in samples collected on the Johnston Petroleum property adjacent to the southern boundary of the Property (Figure 22). Concentrations of TPH-D and undifferentiated TPH have been detected above the MTCA Method A cleanup level of 2,000 milligrams per kilogram (mg/kg) in samples collected on both Parcels (Figure 22). TPH-D has also been detected in soil samples collected to the north, west, and east of the Property. The vertical extent of TPH-D ranges from near the surface to near the water table (0.5 to 5 feet bgs). Several samples collected below the groundwater table exhibited TPH-D, TPH-O, or TPH (undifferentiated) contamination (Figures 23 through 25). Soil samples with concentrations of TPH-D and/or TPH-O above the MTCA Method A cleanup levels were collected from borings

B-34 and UG-9 (located to the east of the ExxonMobil Parcel) at approximate depths ranging from 10 to 14 feet bgs, GP-9 (located to the north of the Property) at an approximate depth of 8 feet bgs, and MW-A1 and MW-A2 (located to the west of the ADC Parcel) at approximate depths ranging from 7.5 to 9 feet bgs.

The extent of TPH-D impact in soil hydrogeologically downgradient (west and northeast of the Property) cannot be inferred based on existing data. This is considered to be a data gap that will be addressed in the data gaps investigation.

6.1.2 TPH-G

Soil analytical data for TPH-G (with BTEX and lead) are shown on Table 3. The horizontal and vertical distribution of TPH-G detected in soil samples is shown on Figures 26 through 29. Historical analytical data are not available for TPH-G in soil samples collected within the Property. TPH-G was not detected above 30 mg/kg (MTCA Method A cleanup level if benzene is present) in soil samples collected to the south and southwest of the Property. TPH-G greater than 30 mg/kg and less than 100 mg/kg was noted in the southwest of the Site, and concentrations greater than 100 mg/kg were noted to the northwest, north and east of the Site (Figure 26). The western (downgradient) extent of TPH-G impact in soil cannot be inferred based on existing data and this is considered to be a data gap that will addressed in the investigation.

6.1.3 Benzene, Toluene, Ethylbenzene, and Total Xylenes

Soil analytical data for BTEX are shown on Table 3. The horizontal and vertical distribution of benzene detected in soil samples is shown on Figure 30. The horizontal distribution of toluene, ethylbenzene, and total xylenes is shown on Figures 34 through 36, respectively. Soil samples containing concentrations of benzene greater than the MTCA Method A cleanup level of 0.03 mg/kg have been collected from three general areas: the center of the ExxonMobil Parcel; off-Property to the east; and one location off-Property to the northwest (Figure 30). In the case of the first two of these areas, surrounding samples did not have reportable concentrations of benzene. However, the majority of the soil samples were analyzed for BTEX using EPA Method 8020. This analytical method has benzene detection limits greater than the MTCA Method A cleanup level of 0.03 mg/kg. The extent of benzene impact in soil within the center of the ExxonMobil Parcel and off-Property to the east cannot be inferred based on existing data and is considered a data gap that will be addressed in the data gaps investigation

6.1.4 Lead

Soil analytical data for lead are shown on Table 3. The horizontal and vertical distribution of lead in soil is shown on Figures 37 through 40. Historical analytical data for lead are not available for soil samples collected within the ExxonMobil Parcel. No soil samples collected at the Property or neighboring properties contained lead at concentrations above the MTCA Method A cleanup level for industrial land use of 1,000 mg/kg. No lead impact in soil was identified because soil samples did not have lead concentrations above the MTCA Method A cleanup level for industrial land use.

6.1.5 PAHs

Soil analytical data for PAHs are shown on Table 4. Soil samples collected within the Property boundaries have not been analyzed for PAHs. Soil samples for PAH analyses have been collected from 15 locations on neighboring parcels. Noncarcinogenic PAHs were detected in soil samples, but none was found at concentrations that exceeded MTCA Method B cleanup levels. Samples collected west of the Property have not contained detectable concentrations of PAHs. Because no noncarcinogenic PAHs were detected above MTCA Method cleanup levels A (or MTCA Method B if no value for Method A was available), analytical results for noncarcinogenic PAHs are not mapped. cPAH concentrations were evaluated in the context of toxicity equivalencies (WAC 173-340-708(8)(e)). The toxicity equivalent quotients (TEQs) were calculated by assigning one-half of the method reporting limit for nondetected compounds multiplying by their assigned TEQ value and summed. Four soil samples collected at locations north and south from the Property (GP-7, GP-8, GP-9, and MW-32), contained benzo(a)pyrene and/or TEQ-adjusted concentrations of total cPAHs above the MTCA Method A cleanup level for residential land use of 0.1 mg/kg. The horizontal and vertical distribution of TEQ-adjusted concentrations of total cPAHs in soil is shown on Figures 41 and 42, respectively.

6.2 Liquid-Phase Hydrocarbons

Historically, LPH has been observed at greater than trace thicknesses primarily in the northern portion of the Property and on nearby adjacent parcels (Figure 43). Trace amounts of LPH have also been observed on the southern portion of the ExxonMobil Parcel. The observed presence of LPH has largely been associated with wood debris in explorations. It is possible that peat layers are acting as confining layers for the migration of LPH. LPH has not been observed in off-Property wells to the northwest. LPH typing analysis has indicated that LPH recovered from the Property had characteristics of a range of products including degraded diesel mixed with degraded gasoline and heating oil.

The current monthly LPH monitoring regime is described in Section 4.0. The table below lists the maximum thickness of LPH measured in wells with more than trace amounts of LPH at the Property and neighboring parcels since 2002.

Maximum Measured Thickness of LPH

Well Type	Well Name	Maximum LPH Thickness in Feet	Month and Year Measured
Recovery	LPH-5	4.21	January 2003
Recovery	LPH-7	0.01	November 2007
Recovery	LPH-8	0.01	February 2006
Recovery	LPH-9	0.16	October 2008
Monitoring	W-1	4.42	October 2005
Monitoring	W-2	7.43	June 2002
Monitoring	W-10R	1.00	July 2003
Monitoring	W-17	0.1	March 2002
Monitoring	MW-27	2.60	March 2005
Monitoring	MW-29	7.18	October 2002

The maximum thickness of LPH measured in wells at the Property and neighboring parcels since 2002 is displayed on Figure 43.

6.3 Groundwater

Shallow unconfined groundwater occurs at the Site at depths of 1 to 5 feet bgs. Previous groundwater elevation data indicate fluctuations between high and low seasonal water tables of up to 3 feet. Based on the historical groundwater elevation data, groundwater beneath the Property flows generally to the west and to the northwest (Figure 19). The groundwater gradient across the Property averages 0.0455 feet/feet as calculated between wells W-6 and MW-A1.

A 24-hour aquifer test was conducted by RZA AGRA Earth & Environmental, Inc. (RZA AGRA) in December 1991. The aquifer test consisted of pumping groundwater from monitoring well MW-10 at a rate of approximately 1 to 2 gallons per minute and measuring the response in monitoring well MW-18 and recovery wells RW-1 and RW-2. The radius of influence included most of the northeastern quarter of the ExxonMobil Parcel. The aquifer test results indicated that the hydraulic conductivity at the Property ranges from 4.0 to 9.5 feet/day.

According to deep boring logs, no deeper groundwater was encountered. The soils (both silt/clay and sand) become moist at approximately 23 feet bgs in all borings except at MW-1A and MW-2A, where the sand beneath the silt/clay was reported to be saturated.

Groundwater samples collected at the Property and neighboring parcels have been analyzed for one or more of the following analytes: petroleum hydrocarbons by EPA Method 8015 Modified and Ecology Methods NWTPH-D, NWTPH-Dx and NWTPH-Gx; BTEX by EPA Method 8020; VOCs by EPA Method 602 (analytical data not found for VOCs except for BTEX); SVOCs by EPA Method 8310; and total and dissolved lead by EPA Method 7421.

6.3.1 TPH-D or TPH (undifferentiated)

Groundwater analytical data for TPH-D, TPH-O, and TPH (undifferentiated) are shown on Table 5. The historical distribution of TPH-D, TPH-O, and TPH (undifferentiated) in groundwater is shown on Figure 44. TPH-D has been detected at concentrations above the MTCA Method A cleanup level of 500 micrograms per liter (µg/L) throughout the ExxonMobil Parcel and to the west, south, and east of the Property. Historical analytical results for TPH-D and TPH (undifferentiated) in groundwater are limited for the ADC Parcel. However, groundwater samples collected from monitoring wells MW-A1 and MW-A2, both located west of the ADC Parcel, have contained TPH-D and TPH-O at concentrations above the MTCA Method A cleanup level. The extent of downgradient TPH-D impact cannot be inferred based on available data, because no data to the west of monitoring wells MW-A1 and MW-A2 exist. This is considered to be a data gap that will be addressed in the data gaps investigation.

6.3.2 TPH-G

Groundwater analytical data for TPH-G are shown on Table 6. The historical distribution of TPH-G in groundwater is shown on Figure 45. TPH-G has been detected at concentrations above the MTCA Method A cleanup level of 1,000 µg/L if benzene is not present and 800 µg/L if

benzene is present primarily on the ExxonMobil Parcel and along the eastern boundary of the ADC Parcel. Historical groundwater TPH-G data are limited for the ADC Parcel. TPH-G has also been detected at concentrations greater than 1,000 or 800 µg/L in samples collected off-Property to the east and northeast. A groundwater sample collected from MW-22 in December 1991 contained TPH-G with a concentration exceeding the MTCA Method A cleanup level. Concentration of TPH-G in groundwater sample collected from W-6 in February 2009 was reported below MTCA Method A cleanup levels. Monitoring well W-6 is located at the eastern portion of the Property. In addition, eastern monitoring wells W-17 and MW-27 through MW-30 contain various amount of LPH (Figure 43). TPH-G impact to the east of the Property will be further investigated in the data gaps investigation.

6.3.3 Benzene, Toluene, Ethylbenzene, and Total Xylenes

Groundwater analytical data for BTEX are shown on Table 6. The historical distribution of benzene, toluene, ethylbenzene, and total xylenes in groundwater is shown on Figures 46 through 49, respectively. Historical analytical data for benzene in groundwater are limited for the ADC Parcel. Benzene has been detected at concentrations above the MTCA Method A cleanup level of 5 µg/L primarily on the ExxonMobil Parcel and to the east of the Property. Benzene has not been detected in groundwater samples collected south or west of the Property. Benzene concentration were reported in groundwater samples collected from monitoring wells MW-40R, MW-11, MW-19, MW-40R, MW-1A, MW-2A, W-3, and W-6) in February 2009 had either below the laboratory detection limits or below the MTCA Method cleanup levels. No ethylbenzene and/or toluene was detected at concentrations above the respective MTCA Method A cleanup level. One sample collected from MW-18 in 1988 had a concentration of total xylenes exceeding the MTCA Method A cleanup level. The extent of benzene impact downgradient of the Property can be inferred to be within the Federal Avenue right-of-way based on the fact that benzene was not detected in samples collected from MW-A1 and MW-A2, which are west of Federal Avenue. The extent of benzene impact upgradient from the Property can be partially inferred based on the fact that benzene was not detected in samples collected from monitoring wells MW-27 and MW-28. The extent of upgradient benzene impact can be inferred to be east of these monitoring wells and will be confirmed in the data gaps investigation. The extent of upgradient benzene impact to the east of the Property and south of MW-28 cannot be inferred based on available data, and is considered to be a data gap that will be addressed in the data gaps investigation.

6.3.4 Total and Dissolved Lead

Groundwater analytical data for total and dissolved lead are shown on Table 6. The historical distribution of total and dissolved lead in groundwater is shown on Figures 50 and 51, respectively. Total lead has been detected at concentrations above the MTCA Method A cleanup level of 15 μ g/L in groundwater samples collected at the ExxonMobil Parcel. Historical analytical data for total and/or dissolved lead are not available for the ADC Parcel or from the area to the northwest of the Property. The upgradient and downgradient extent of total lead impact cannot be inferred based on available data.

Dissolved lead has not been detected at concentrations above the MTCA Method A cleanup level of 15 μ g/L in samples collected at the Property or on neighboring parcels. Dissolved lead has not been detected to the east of the Property. One groundwater sample collected in 1993 from well MW-33 had a reportable concentration of dissolved lead. However, this concentration was below the MTCA Method A cleanup level. No further work is required.

6.3.5 PAHs

Groundwater analytical data for PAHs are shown on Table 7. Concentrations of cPAHs were evaluated in the context of toxicity equivalencies (WAC 173-340-708(8)(e)). The TEQs were determined assuming one-half of the method reporting limit for nondetected compounds. The historical distribution of cPAHs in groundwater is shown on Figure 52. TEQ-adjusted total cPAH concentrations exceeded the MTCA Method A cleanup level of 0.1 µg/L for water in samples collected primarily in the southern portion of the Property and to the northeast of the Property, in a line roughly corresponding to cross-section A-A'. cPAHs have not been detected in the extreme southern portion of the ExxonMobil Parcel. Historical analytical data for PAHs in groundwater are limited for the ADC Parcel and for the area west and northwest of the Property. Therefore, this is considered to be a data gap that will be addressed in the data gaps investigation.

7.0 CONCEPTUAL SITE MODEL AND PATHWAYS

This section presents the Conceptual Site Model (CSM) with applicable pathways and transport mechanisms based on physical characteristics of the Site. During preparation of the CSM, the following factors were taken into consideration:

- Presence of Indicator Hazardous Substances:
- Concentration of IHSs in relation to screening and other applicable criteria;
- Extent and distribution of IHSs in impacted media;
- Transport mechanisms between media;
- Potential migration to receptors;
- Properties of IHSs;
- Properties of media; and
- Potential for natural attenuation.

As discussed in Section 2,1, "Property" refers to the two contiguous parcels owned by ExxonMobil and by ADC (the ExxonMobil Parcel and the ADC Parcel, respectively). The Property and portions of neighboring parcels to the west (former ADC/General Petroleum Co. warehouse), north (Everett Avenue right-of-way up to the CSO line), and east (BNSF property and in the vicinity of the former loading racks) that are affected by hydrocarbon contamination comprise the ExxonMobil ADC Site (Ecology Facility ID 2728), as defined by MTCA ("Site"). The precise boundaries of the Site have not yet been determined. Locations within the Property boundary may be referenced as the Property or on-Property, and locations outside the Property boundaries may be referenced as off-Property.

7.1 Current and Future Land/Water Uses

Based on the City of Everett Comprehensive Plan, the Property and the land to the north, south, and west are zoned for Heavy Manufacturing (M-2). Zoning to the east is the Central Business District (B-3).

In 1999 as an interim action completed under the 1998 Agreed Order, ExxonMobil/ADC capped the Property with asphalt pavement. The asphalt-capped Property is currently leased to KC for employee parking. The property downgradient from the Property is currently used by the Port of Everett for storage. There is no known proposed future development of the Property; however, it is likely that the Property will remain industrial in the future. In addition the groundwater below the site will never be considered for beneficial use due to the industrial nature of the area, the closeness to salt-water intruded groundwater, the availability of a public potable water supply, and the existence of County and City regulations against use of drinking water wells.

7.2 Sources and Types of Contamination

Petroleum hydrocarbon impacts to soil and groundwater at the Property have resulted from past releases from former operations at the ExxonMobil and ADC Parcels. Beginning in the 1920s or earlier, the Property was used for petroleum bulk storage, transfer, and distribution operations; marine offloading; truck loading; and rail loading and/or unloading operations of petroleum products. The only identified known source of subsurface contamination is a reported spill in the southern portion of the ADC Parcel. There is also a possibility that impacts to soil and groundwater beneath the Property have resulted from off-Property sources, such as facilities located to the north and northeast of the Property (Section 2.2.2). These facilities operated as historic petroleum bulk facilities and included bulk fuel pipelines, pumping facilities, storage facilities, railroad spurs, and railroad and maritime loading facilities. The sources described above are considered primary sources of contamination. Liquid-phase hydrocarbons described in Section 6.2 are considered a secondary source of contamination.

In association with remedial actions undertaken on the Property in 1999, excavations have occurred that removed some of the identified IHS's. These activities include excavation associated with capping the Property, removal of building slabs, excavation of the firewall foundation in the northeast of the ADC Parcel and excavation of the interceptor trench located along the northern and western boundaries of the Property. A comparison of pre-cap Property site contours and finished contours (minus 2.5 feet for the capping material) was used to determine the excavated areas and depths (original and post cap contour maps can be found in Appendix B – historical maps and documentation).

In May 1988, a 45-long infiltration gallery was installed in the vicinity of MW-14. In March 1989, an automated groundwater extraction and treatment system was installed in the location of the May 1988 infiltration gallery. The system consisted of a fluid extraction sump situated in RW-1 (formerly MW-14), an oil—water separator, an air stripper, and infiltration gallery. The infiltration gallery, which was approximately 100 feet long, was constructed parallel to the north side of the ExxonMobil Parcel. In December 1993, an LPH recovery trench was installed to the west of the ExxonMobil Parcel. The trench was installed in a north-south orientation, to a depth of approximately 4 feet bgs. Soil excavated during constructions was stockpiled on the Property, covered with visqueen, and later disposed of at a permitted facility.

Petroleum-affected soils along the overcrossing alignment extended from the west side of California Street to the center portion of the KC parking lot. The contamination was found to be present generally from 4 to 5 feet bgs. The petroleum-affected soils extended over an area of approximately 25,600 square feet and on average were approximately 8 feet thick. Thus, approximately 7,600 cubic yards of petroleum-contaminated soil was calculated to be present along the overcrossing alignment (URS, 2000a). In 2002, these soils were excavated and disposed of during CSTO construction project. According to weight tickets attached to e-mail from Shawn Severn (Premier) to Bill Joyce in 2002, 207.72 tons of contaminated soil associated with CSTO construction was excavated and disposed off at Rinker facility in Everett in 2002. Soil excavation areas are shown on Figure 53.

Presently, five discreet secondary source locations are identified based on the occurrence of free product. The secondary source areas are identified on Figure 54. These areas are vertically delineated based on the deepest occurrence of contaminated soil using the boring logs to determine wood waste containing hydrocarbons or other lithologies with strong odor and/or elevated analysis result.

- Source 1 is situated in the vicinity of well W-1. Well W-1 contains free product with a maximum thickness of 4.42 feet measured in October 2005. In addition, a soil sample that was collected from W-1 at the depth of 3 feet bgs, had 13,000 mg/kg of undifferentiated TPH concentration. Soil contamination to the west of W-1 is delineated by the interceptor trench with no measurable free product noted in the closest recovery wells LPH3 and LPH4. To the east and north high concentrations of TPH were detected in AD-13, AD-14 and AD-10 (boring locations are shown on Figure 22) prior to the placement of the site cap in 1999. These high concentrations would have been removed during the work in 1999, when building slab removal (an office building, oil pump house building, a warehouse, and boiler room, aboveground piping, loading racks) and general excavation occurred. Soil contamination will be verified during the data gap investigations by continuous sampling from 0 to 5 feet of a deep boring to be advanced in the vicinity of AD-10 and AD-11. The lateral extent of Source 1 to the west, south, east, and north is limited to the vicinity of W-1.
- Source 2 is situated in the vicinity of well W-2 and extents laterally towards the northeast. Well W-2 has had frequent trace occurrence of free product. In addition, a soil sample that was collected from W-2 at the depth of 3 feet bgs, had 17,000 mg/kg of undifferentiated TPH concentration.
- Source 3 is limited to the vicinity of well W-10R. Well W-10R inclusive of LPH6 has had frequent occurrence of free product. The lateral extent of Source 3 to the east is defined by TPH concentration below MTCA Method A cleanup level reported in shallow soil sample collected from AD-4. The lateral extent of Source 3 to the west and north is bound by the LPH recovery trench and the firewall foundation. Source 3 lateral extent to the south will be assessed during the data gap investigations with continuous sampling from 0 to 5 feet of a deep boring to be advanced in the vicinity of LPH5.
- Source 4 is situated in the vicinity of former boring B-21-91 where an undifferentiated TPH concentration of 12,000 mg/kg was reported in a soil sample collected from boring B-21-91 at 5 feet bgs. Source 4 extends north towards wells W-17 and LPH9. Both wells have had frequent trace to measurable thickness occurrence of free product. Source 4 does not extend beyond the northern property boundary because no TPH-D and TPH-O above MTCA A cleanup levels were reported in soil samples collected from GP-4 and GP-5. In 1999, the northeast portion of the firewall that was surrounding the former tank farm at the ADC parcel was demolished prior constructing to the cap. The foundation of the firewall in the northeast corner was excavated to the depth of 7 feet bgs (Exponent 2000). This excavation is considered to be the eastern extent of Source 4 and will be verified during the data gaps investigation.

 Source 5 is situated in the vicinity of wells MW-27 and MW-29. The combined area surrounding MW-27 and MW-29 span significant occurrence of wood waste. Both wells have frequent occurrence of free product. The southern extent of Source 5 is unknown and will be assessed during the data gap investigations.

There are no secondary sources of contamination within the ExxonMobil Parcel due to extensive excavation activities on the Parcel and the surrounding properties to the west, east, and south (Figure 53).

7.3 Contaminant Migration Pathways/Media of Potential Concern

This section summarizes applicable transport mechanisms for each affected medium of concern.

7.3.1 Soil

Since the Property is capped, there are two potential transport mechanisms from soil—soil to groundwater, and soil to vapor. Leaching (including infiltration and percolation) can transport soil particles and solubilized constituents to groundwater. The primary area of concern on the site for transport of soil to groundwater is related to the secondary source areas (Figure 54).

Similarly, volatilization of chemicals from soil directly to vapor may allow contaminants to be transported from soil to air. In addition, should the cap be damaged or removed there would be a potential for direct contaminant transport from soil to storm water, surface water, and sediment. Therefore, soil at the Property is a medium of concern. Additionally, paving outside the Property boundary is beyond ExxonMobil's control, so transport mechanisms from soil for the remainder of the Site (outside the Property) should also be considered.

7.3.2 Groundwater

There are two potential mechanisms for transport of contaminants from groundwater – groundwater to vapor and groundwater to surface water. Volatilization of chemicals directly from groundwater to vapor is considered viable. Groundwater can potentially migrate off-Property to Port Gardner Bay. Groundwater migration to the CSO line was observed and mitigated in 1996. Due to extensive repairs to the CSO line made in 1996, subsequent migration of groundwater to the CSO is unlikely. Groundwater that migrates to surface water could also impact sediment via sorption directly from groundwater or from porewater as a result of groundwater flux to surface water. Therefore, groundwater is a medium of concern. At this time, migration of IHSs from groundwater to surface water has not been shown to be occurring although more data is required to confirm this.

7.3.3 Vapor

No potential transport mechanisms from vapor were determined. The vapor phase is considered a terminal endpoint of impact—not a primary source of contaminants to other media. Vapors were evaluated as emanating from other affected media, such as soil and groundwater. Therefore, vapor is not a medium of concern.

7.3.4 Stormwater

No potential transport mechanisms from stormwater were identified. The surface of the Property is capped, and stormwater sheet flows to the catch basins located at the Property and downgradient from the Property. The stormwater system at the Property was video surveyed in 2007, and no breaches or infiltration were observed in the system. Therefore, there is no pathway from soil or groundwater to stormwater, and stormwater is not a medium of concern. However, stormwater has not been shown to have impacts from the Site, so this is an incomplete pathway.

7.3.5 Surface Water

Surface water bodies (e.g. Port Gardner Bay) are considered a terminal endpoint of impact and not a primary source of contaminants to other media. Surface water is a medium of concern due to its status as a terminal endpoint. Surface water transport off the Property is not considered a pathway since the Property is capped with asphalt pavement. Stormwater from the Property discharges to the CSO, which has been reconstructed to eliminate potential contact to affected groundwater. The only pathway to surface water currently is a potential pathway of groundwater to Port Gardner Bay. At this time the completeness of this pathway is not known since the extent of groundwater impacted above screening levels is not fully delineated to the west.

7.3.6 Sediment

No potential transport mechanisms from sediment exist. Sediments are considered a potential terminal endpoint of impact and not a primary source of contaminants to other media. No direct releases from the Property to sediment have been documented, and this transport mechanism is considered not to be a primary source. However, at this time the completeness of this pathway is not known since the extent of groundwater impacted above screening levels is not fully delineated to the west.

7.4 Indicator Hazardous Substances

Under MTCA, "indicator hazardous substances" means the subset of hazardous substances present at the Site that constitute the basis for monitoring and analyses, or the basis for any phase of remedial action for the purpose of characterizing the Site or establishing cleanup requirements for the Site. Consistent with WAC 173-340-703, when defining cleanup requirements at a Site contaminated with a relatively large number of detected chemicals of concern, Ecology might eliminate from consideration those hazardous substances that contribute a small percentage of overall threat to human health and the environment. Historically, TPH-D, TPH-O, TPH-G, benzene, toluene, ethylbenzene, xylenes, PAHs, and lead were found in soil and groundwater at the Property.

The statistical summaries for soil and groundwater results are presented in Tables 8 and Table 9, respectively. The summaries present the number of samples analyzed, the frequency of detection, the minimum and maximum detection limits, the minimum and maximum results, the mean result for each chemical, the number of results that exceed MTCA Method A or MTCA

Method B cleanup levels, and whether or not the chemical is selected as an indicator hazardous substance.

7.4.1 Soil

The Property and its immediate surroundings are zoned for industrial use. The Property is covered by a low-permeability asphalt/concrete cap. Soils at the Property consist of fill overlying recent marshland and transitional beds deposited between Fraser and pre-Fraser glaciations. Heterogeneous mixtures of sands, silts, peat, and wood debris extend to depths of 20 to 27 feet bgs. A discontinuous organic silt/clay unit and a dense, moist, brown, medium sand unit were encountered at greater depths in borings that were advanced to depths greater than 20 feet bgs.

With the asphalt cap on the Property, the potential exposure routes and receptors are limited to:

- Contact (dermal, incidental ingestion, or inhalation) with hazardous substances in soil by construction workers;
- Partitioning of hazardous substances in soil to groundwater.

It is assumed at this point that the cap on the property will either remain in place as part of the final remedy or the soil will be addressed.

Constituents detected in the upper 15 feet of soil were evaluated to assess the potential risk to humans, plants, and small animals posed by contaminated soil. These exceedances appear to be mostly limited to the fill material beneath the Property. In addition, soil concentrations considered protective of terrestrial receptors (plants and animals) were assessed using a simplified terrestrial ecological evaluation (WAC 173-340-7492). A copy of the evaluation is presented in Appendix E. According to the simplified terrestrial ecological evaluation, the Site does not have a substantial potential for posing a threat of significant adverse effects to terrestrial ecological receptors. Thus, ecological receptors will be removed from further consideration during development of cleanup levels.

As shown in Table 8, the following chemicals have been detected in soil samples collected at the Site:

- TPH-D has been detected at concentrations above the MTCA Method A cleanup level of 2,000 mg/kg at the Property and to the north, west, and east (Figures 22 through 25). The majority of the samples with TPH concentrations above the MTCA Method A cleanup level were collected at shallow depths (less than 5 feet bgs). However, soil samples with exceedances of TPH were collected at depths of 7.5 feet bgs and greater in several borings. TPH-D and TPH-O were selected as indicator hazardous substances.
- TPH-G was not detected at concentrations above 30 mg/kg (MTCA Method A cleanup level if benzene is present) in soil samples collected to the south and southwest of the Property, but was detected at concentrations greater than 100 mg/kg in soil samples collected to the north, west, and east of the Site (Figures 26 to 29). Samples collected

on the Property were not analyzed for TPH-G. TPH-G was selected as an indicator hazardous substance.

- Concentrations of benzene above the MTCA Method A cleanup level of 0.03 mg/kg were reported for soil samples collected on- and off-Property (Figures 30 through 33). Samples containing concentrations of benzene greater than 0.03 mg/kg have been collected from three general areas: the center of the ExxonMobil Parcel; off-Property to the east; and one location off-Property to the west (MW-A2) (Figure 30). Benzene was selected as an indicator hazardous substance due to the potential risk to humans, plants, and small animals. Concentrations of ethylbenzene and total xylenes have also been detected above the MTCA Method A cleanup levels (Figures 35 and 36). However, these constituents are associated with benzene, which has already been identified as a hazardous indicator substance, so none of these constituents by itself was selected as an indicator hazardous substance.
- Soil samples collected on the Property and to the west, north, and east of the Property did not contain lead at concentrations above the MTCA Method A cleanup level for industrial land use (1,000 mg/kg) (Figures 37 through 40). Lead was not selected as an indicator hazardous substance.
- Samples collected on the Property have not been analyzed for PAHs. However, toxicity-equivalent concentrations of total cPAHs were reported below MTCA Method A industrial cleanup levels but above MTCA Method A cleanup levels for unrestricted use in four soil samples collected off-Property to the north and to the south (Figures 41 and 42). Three soil samples contained benzo(a)pyrene at a concentration above the MTCA Method A residential cleanup level of 0.1 mg/kg. Thus, cPAHs were selected as indicator hazardous substances.

7.4.2 Groundwater

Groundwater beneath the Site is not currently used as a drinking water source nor is it likely to be considered a drinking water (potable) source in the future as discussed earlier. However, preliminary screening criteria currently used for the Site assume the highest potential beneficial use, which is as a potential source of drinking water.

WAC 173-340-720(2)(c) and (d) provides that even if groundwater is classified as a potential future drinking water source, Ecology recognizes there are sites for which a very low probability exists that the groundwater would be used as a drinking water supply, owing to the proximity of surface water that is unsuitable for use as a domestic supply. The Site's groundwater is in direct proximity to a surface water body not suitable as a potable water supply (Port Gardner Bay). There are no known water supply wells within one-half mile of the Site, and the groundwater does not serve as a current source for drinking water. Neither the Site nor the Port Gardner Bay surface water is hydraulically connected to a future source of groundwater that may be used as a domestic drinking water supply.

The top of the saturated zone is situated within fill materials at approximate depths ranging from 1 to 5 feet bgs. Previous groundwater elevation data indicate fluctuations of up to 3 feet

between high and low seasonal water tables. Based on the historical groundwater elevation data, groundwater beneath the Property flows generally toward the west and northwest. Most likely, the groundwater table is higher currently than in the past due to infill of the coastline to the west of the Property. Groundwater levels gauged in monitoring wells constructed at the Site do not appear to be significantly affected by tidal fluctuations, however, the recent tidal study results were inconclusive to determine the exact tidal influence.

Analytical data from groundwater samples were compared to groundwater cleanup levels protective of human health. The screening levels selected are MTCA Method A unrestricted use cleanup levels, if available. MTCA Method B cleanup levels were used for IHSs for which no Method A cleanup level exists. The groundwater analytical results indicate the following constituents are present in groundwater beneath the Site.

- TPH-D and/or undifferentiated TPH has been detected at concentrations above the MTCA Method A cleanup levels throughout the Site (Figure 44). Therefore, TPH-D was selected as an indicator hazardous substance.
- TPH-G has been detected at concentrations above the MTCA Method A cleanup levels
 in groundwater samples collected from the monitoring wells installed at the Property as
 well as monitoring wells installed to the east and northeast of the Property (Figure 45).
 Therefore, TPH-G was selected as an indicator hazardous substance.
- Benzene has been detected in groundwater samples collected on- and off-Property at concentrations above the MTCA Method A cleanup levels (Figure 46). Therefore, benzene was selected as an indicator hazardous substance. Toluene, ethylbenzene, and total xylenes have also been detected in groundwater samples collected on- and off-Property (Figures 47, 48, and 49, respectively). No samples contained toluene and ethylbenzene at concentrations above the Method A cleanup levels (Figures 47 and 48). Only two samples collected from MW-15 and MW-18 in 1988 contained total xylenes at concentrations exceeding the MTCA Method A cleanup level (Figure 49). Since toluene, ethylbenzene, and total xylenes are not exceeding Method A unrestricted cleanup levels, with the exception of total xylene detections reported in two samples in 1988, those constituents in groundwater do not pose a risk to humans. None of these constituents was selected as an indicator hazardous substance.
- Total lead has been detected at concentrations above the MTCA Method A cleanup level in groundwater samples collected at the Site (Figure 50). Increased turbidity in groundwater samples may be attributed to soil lithology, increased organic content, screen size, and/or purging. High concentrations of total lead occurring in groundwater samples at the Site are most likely due to increased organic content in the formation being sampled. Due to the high turbidity of groundwater samples, total lead results in groundwater are not representative of groundwater quality due to the contribution of lead contained in suspended sediment. Dissolved lead has not been detected at concentrations above the MTCA Method A cleanup level in groundwater samples collected at the Site (Figure 51). Therefore, lead was not selected as an indicator hazardous substance.

 cPAHs have been detected at toxicity-equivalent adjusted concentrations above the MTCA Method A cleanup level in groundwater samples collected at the Site (Figure 52). Therefore, cPAHs were selected as indicator hazardous substances.

7.5 Potential Receptors and Exposure Pathways

In this section, potential exposure pathways are evaluated to assess whether complete pathways exist that could pose a threat to potential receptors. Soils are hydrologically linked to groundwater and surface water systems. One of the objectives of soil remediation at the Site is to manage soil-to-groundwater pathways to prevent unacceptable transfer of contaminants from the soil, which may ultimately affect groundwater and potential surface water use. This section identifies the locations and environmental media (soil and groundwater) at the Site that require cleanup action evaluation in the FFS.

7.5.1 Potential Receptors

Human receptors are the most sensitive receptors to the IHSs under current and likely future land uses. The entire range of activities associated with land use at the Site, on-Property, and off-Property, must be free of appreciable health risks. Potential human receptors are the general public, Kimberly-Clark workers, and future construction workers.

For the Property, ecological receptors are not considered to be present due to the lack of any habitat. Since there remains a potential pathway of groundwater to Port Gardner Bay, there could be potential ecological receptors such as marine life and birds; however, at this time it is not known if Site-affected groundwater has migrated to Port Gardner Bay at concentrations above screening levels. Further data will be collected to delineate the extent of groundwater impacts as part of the FFS work, and this information will determine if ecological receptors need to be further evaluated.

7.5.2 Potential Exposure Pathways

Potential exposure pathways for the public, general workers and construction workers for each medium were evaluated. A descriptive summary of this evaluation is provided below.

7.5.2.1 SOIL

The Property is covered with a low-permeability asphalt surface cap that prevents direct contact with the underlying soil. Therefore, the pathway is currently incomplete for direct exposure to contaminants in soil at the Property by the general public and general workers for the current site use.

Exposure to soil by construction workers via dermal absorption, ingestion, and/or inhalation as a result of subsurface excavation is a potential exposure pathway. This potential exposure pathway will be addressed in the FFS.

7.5.2.2 GROUNDWATER

The Property is currently covered with a low-permeability asphalt surface cap, which prevents direct contact with the underlying groundwater and minimizes infiltration of surface water. Therefore, the pathway is incomplete for direct exposure to contaminants in groundwater at the Site by the general public and general workers. In addition, groundwater beneath the Site is not currently used as a drinking water source nor is it likely to be considered a drinking water (potable) source in the future.

As noted in Section 7.3.2, there is a potential pathway of contaminants from groundwater to surface water (Port Gardner Bay). Potential exposure of receptors to surface water impacted by contaminant transport from groundwater will be addressed in the FFS.

7.5.2.3 STORM WATER

Storm water on the Property drains to storm drains that are connected to a combined sewer. Water entering these storm drains is conveyed to the City of Everett sewage treatment plant. This pathway is considered complete: however, the potential is low for direct exposure to contaminants in storm water at the Site by the general public and general workers.

7.5.2.4 SOIL AND GROUNDWATER TO VAPOR

The Property is currently covered with an asphalt cap that limits vapor migration from soil. Since the cap limits but does not eliminate vapor migration, the pathway remains complete; however, the potential is low for exposure by general workers to contaminants transported to vapor from soil or groundwater at the Property. Exposure to vapor by construction workers at the Site will be addressed in the FFS.

7.5.2.5 GROUNDWATER TO SURFACE WATER

There remains a complete pathway of groundwater to Port Gardner Bay, although data will be obtained as part of the FFS work to evaluate whether groundwater is migrating to the Bay at concentrations above ultimate cleanup levels. It is also noted that groundwater that actually migrates to surface water could also impact sediment via sorption directly from groundwater or from porewater as a result of groundwater flux to surface water. Depending on the results of the groundwater delineation, aquatic organisms and terrestrial organisms in the Bay may be potential receptors of contaminants in groundwater and may need to be evaluated in the FFS. The risk of exposure to contaminants in surface water is low for general workers and construction workers.

The risk of exposure to contaminants in surface water by potential receptors will be addressed in the FFS.

7.6 Overview of Site Conditions

An overview of the secondary source areas and the extent of groundwater impacted at concentrations above screening levels at the Site is presented in Figure 54. LPH is located primarily in the area northeast of the Property boundary in the vicinity of MW-27 and MW-29.

Sporadic occurrences of LPH have been observed in the southern portion and on the western border of the Property. During exploration, LPH has been primarily associated with wood debris. Elevated concentrations of TPH-D, TPH-G, and benzene in soil have also been noted in the vicinity of the LPH. Concentrations of PAHs, cPAHS, lead, toluene, ethylbenzene, and xylenes in soil are not elevated. There is no observed downgradient migration of gasoline or benzene in the dissolved phase. Dissolved-phase concentrations of diesel have been observed downgradient of the Property and will be delineated as part of the data gaps work and addressed in the FFS.

8.0 FOCUSED FEASIBILITY STUDY

This section summarizes the general approach to completing the FFS. Remaining data gaps will be addressed by conducting additional remedial field investigations. Prior to field investigations, appropriate start cards will be obtained from the Ecology Water Resources Program to install monitoring wells. Details of the approach to completing the FFS will be developed based on results of the data gaps investigation.

The investigation of the data gaps described in Section 8.1 is addressed in the SAP, included as Appendix A of this Work Plan. The SAP constitutes a work plan for all drilling, sampling, and other investigative activities to be conducted for the FFS. A schedule of the proposed activities and reporting timelines is provided in Appendix G.

8.1 Data Gaps and Supplemental Field Investigations

The Property and neighboring parcels have been the subject of extensive subsurface investigations to characterize the nature and extent of impacts to soil and groundwater from hydrocarbon releases at the Property. The next step to complete the FFS is to complete the characterization of the nature and extent of soil and groundwater contamination resulting from releases at the Property and select a final remedial approach to address the historic releases.

Five areas of affected soil and groundwater at the Site are illustrated on Figure 54. As detailed in Section 7.0, AMEC has identified certain data gaps to complete the FFS. These data gaps and the proposed supplemental field investigations to complete these data gaps are described below. The proposed field investigations are summarized on Figure 55.

8.1.1 Extent of TPH-D, TPH-O, and TPH-G Impacts in Groundwater

TPH-D, TPH-O, and TPH-G have been observed in the dissolved phase in groundwater beyond the perimeter of the Property boundary. The western, northwestern and northeastern limits of the dissolved-phase plume are not fully defined. In addition, the potential presence of a dissolved-phase plume associated with the ADC Garage and Shop formerly located across Federal Avenue from the Property is unknown.

To address the data gap, four groundwater monitoring wells (MW-A3 through MW-A6) will be installed to depths of less than 20 feet bgs between Port Gardner Bay and the Property, and one groundwater monitoring well (MW-A7 [deep]) will be installed upgradient of the Property (Figure 55). In addition, one grab groundwater sample will be collected from boring AP-1 located in the former ADC Garage and Shop. The wells will aid in defining the limits of petroleum-impacted groundwater. During drilling, soil samples will be collected for analyses of petroleum hydrocarbons to evaluate whether additional petroleum hydrocarbon sources are contributing to the existing plume.

8.1.2 Nature of Aquitard Below Property

Containment as an appropriate strategy will be evaluated to address the hydrocarbon source area. The silt/clay unit that underlies the Property may serve as an aquitard, but past investigations have provided inconsistent information related to the description, depth, and continuity of the layer.

To address this data gap, six deep soil borings (AB-1 through AB-6) will be advanced around the perimeter of the Property to maximum depths of 35 feet bgs to assist in evaluating the lateral extent of the aquitard. In addition, an additional deep boring will be advanced to the east of MW-29. The deep boring will be backfilled and completed as a 2-inch-diameter monitoring well (MW-A7) screened from 3 to 13 feet bgs. As part of this investigation, soil samples will be collected and tested for physical geotechnical properties as needed for design purposes.

8.1.3 Extent of Soil Impacts Surrounding ADC Parcel

To evaluate the limits of any proposed excavation the extent of impacts to soil should be thoroughly characterized. The precise vertical and horizontal extent of hydrocarbon impacts in soil in the area east of the northern portion of the ADC Parcel needs to be assessed to accurately determine the extent and volume of potentially impacted soil. According to the boring log for MW-29, contaminated soil was detected by field screening at a depth of 9 feet bgs in MW-29, but no samples were collected for chemical analyses from depths greater than 2 feet bgs in this boring or nearby locations MW-27, MW-28, and MW-30. LPH was historically present in monitoring well MW-29. Characterizing the vertical and horizontal extent of soil impacts in the vicinity of MW-29 will better quantify the extent of affected soil and support a practicability analysis for remedial alternatives pursuant to MTCA.

To address this data gap, six soil borings (AP-2 through AP-7) will be advanced in the area east of the northern portion of the ADC Parcel (near former General Petroleum Corporation's spur fuel loading rack) to a maximum depth of 15 feet bgs to define the lateral and vertical extent of soil contamination in the vicinity of MW-29. In addition, the additional deep boring advanced to the east of MW-29 to evaluate the containment option for the hydrocarbon source areas (Section 8.1.2) will provide additional information about soil impacts in this area. The deep boring will be backfilled and completed as a 2-inch-diameter monitoring well (MW-A7) screened from 3 to 13 feet bgs.

In addition, four of the six deep soil borings (AB-1. AB-2, AB-5, and AB-6) will be advanced around the perimeter of the Property to assist in evaluating the lateral extent of the secondary source areas 1, 2, and 4 (Section 7.2). Soil samples from borings AB-1 and AB-5 will be collected continuously from approximately 0.5 to 5 feet bgs. Shallow samples (above water table) with the obvious signs of petroleum-hydrocarbon contamination will be analyzed for TPH-D and TPH-O.

8.1.4 Tidal Influences

Minimal groundwater response to tidal fluctuations has been observed during previous investigations.

The potential for tidal influences on groundwater will be evaluated further by undertaking a tidal study incorporating a temporary stilling well in Puget Sound as well as newly installed and existing groundwater monitoring wells.

8.1.5 Extent of Ongoing Natural Attenuation

Natural attenuation appears to be occurring in areas affected by releases from the Property based on the presence of dissolved-phase petroleum hydrocarbons in groundwater. It is not known whether natural attenuation processes are successfully reducing concentrations of hydrocarbons to below preliminary screening levels in the downgradient plume. The rate of degradation within the plume is also unknown.

To assess the rate of natural attenuation, groundwater samples will be collected from wells within the downgradient plume and analyzed for a suite of natural attenuation parameters. The groundwater sampling will be designed so as to collect samples representative of separate wet and dry seasons. Analyses will include general chemistry water quality parameters (i.e., dissolved oxygen, total organic carbon, alkalinity, etc.). The selection of natural attenuation parameters will be consistent with requirements specified in Ecology guidance (Ecology 2005).

8.1.6 Aquifer Properties

To determine the hydraulic conductivity of off-Property aquifer materials, aquifer testing will be performed. The aquifer testing will be performed by conducting slug tests in two of the downgradient monitoring wells installed as part of this Data Gaps Supplemental Investigation.

8.1.7 Analytical Testing

Two soil samples collected from each soil boring installed as part of this Supplemental Investigation will be analyzed for TPH-G, TPH-D, and TPH-O using Ecology methods NWTPH-Gx and NWTPH-Dx; samples with detectable concentrations of TPH-D will be run with a silica gel cleanup to remove any biogenic interference (typically from decaying plant matter).

Soil samples from the downgradient borings (MW-A3 through MW-A6 and AP-1) will be analyzed for BTEX and methyl tertiary-butyl ether (MTBE) using EPA Method 8260B, and low-level PAHs by EPA method 8270D SIM. In addition, select soil samples from these downgradient borings that exhibit contamination based on field screening will be analyzed for 1,2-dichloroethane, ethylene dibromide (dibromoethane), and n-hexane by EPA Method 8260B.

Two soil samples with the highest concentration of detected petroleum hydrocarbons will be analyzed for extractable petroleum hydrocarbons (EPH) and volatile petroleum hydrocarbons (VPH) using Ecology Method WA MTCA-EPH/VPH. The soil sample results will assist in defining the horizontal and vertical extent of soil contamination with IHS. Results of EPH/VPH analyses will be used in calculating remediation levels during the FFS.

Two soil samples collected from the saturated zone of the perimeter borings (AB-1 though AB-6) will be analyzed for total organic carbon, soil bulk density, porosity, volumetric water content, and permeability (Shelby tube). Samples of drill cuttings will be retained from each

boring for use in developing design parameters for a potential slurry wall mix, if necessary. Data from this testing will be used to assist in the development of remedial alternatives.

Groundwater monitoring will be conducted at the Site after the additional wells are installed. The groundwater samples will be collected from five existing wells (MW-11, MW-19, MW40R, MW-A1 and MW-A2) that are currently monitored semiannually, four newly installed downgradient monitoring wells (MW-A3 through MW-A6), and one newly installed upgradient monitoring well (MW-A7). The quarterly groundwater samples will be analyzed for TPH-G, TPH-D, and TPH-O using Ecology Methods NWTPH-Gx and NWTPH-Dx; BTEX and MTBE by EPA Method 8260B; low-level PAHs by EPA method 8270D SIM; and dissolved lead by EPA Method 6020. In addition, selected groundwater samples will be analyzed for 1,2-dichloroethane, ethylene dibromide and n-hexane by EPA Method 8260B. As previously mentioned, groundwater samples will be collected during the dry season and wet season quarterly groundwater monitoring events for analysis of natural attenuation parameters.

8.2 General Approach to Focused Feasibility Study

After the Data Gap Supplemental Investigation has been completed and at least one groundwater monitoring event that incorporates the newly installed wells has been conducted, the FFS will be performed. The purpose of the FSS is to identify and evaluate remedial alternatives for the contaminated subsurface soil to minimize or prevent further releases of pollutants into the groundwater and reduce the off-site migration of contaminated groundwater.

In advance of the FFS report the Remedial Action Objectives have been identified. The RAOs are site-specific goals established to protect human health and the environment. The RAOs provide a framework for developing and evaluating remedial action technologies and alternatives. Three preliminarily RAOs have been identified for the FFS.

- Reduce the potential for IHSs to leach from site soil to groundwater.
- Reduce the potential for IHSs to migrate off site.
- Meet cleanup levels in soil and groundwater at the applicable point of compliance within a reasonable restoration time frame.

Groundwater and soil are the two primary media that will require remedial action. The objective will be to address the remaining exposure pathways/receptors and this can be achieved by reducing concentrations and contaminant mass in soil (source control) which therefore, will address the soil to groundwater pathway and the vapor pathway. Institutional controls will be evaluated to address the remaining direct exposure pathway.

MTCA requires that cleanup levels be met at the point of compliance or at a conditional point of compliance. MTCA (WAC 173-340-720 through 173-340-760) defines development of cleanup levels for groundwater and soil and outlines the process for determining the point of compliance or conditional point of compliance (WAC 173-340-720(8)(c) for each medium. A conditional point of compliance can be at the Property boundary or beyond for sites adjacent to surface

water assuming that all property owners beyond the Property agree to the conditional point of compliance.

MTCA acknowledges that cleanup levels may not be met at the point of compliance initially but requires that cleanup levels be met within a reasonable time frame [WAC 173-340-360 (4)]. MTCA also allows the use of "remediation levels" [WAC 173-340-360 (2)(h)] for sites where cleanup levels cannot necessarily be achieved at the point of compliance or where a more permanent solution is not practical based in part on MTCA's disproportionate cost analysis.

Based on the historical data and the data obtained during the Data Gap Supplemental Investigation, the FFS will:

- Finalize Remedial Action Objectives;
- Establish site-specific cleanup levels, points of compliance for soil and groundwater, and, if necessary, propose remediation levels;
- Identify applicable state and federal laws;
- Evaluate Cleanup Alternatives based on MTCA criteria (WAC 173-340-360), including threshold requirements, permanency of remedial solutions, restoration time frame, public concerns, and cost, including procedures to assess relative benefits versus disproportionate cost; and
- Recommend a Remedial Action Alternative.

The FFS will also present an expected schedule of implementation and a public participation plan.

8.2.1 Review of Potential Remedial Alternatives

A reasonable number and type of cleanup action alternatives have been previously evaluated in an earlier report (Exponent, 1998a). Based on the previous work and discussion with Ecology, the FFS will not redo the screening of technologies section of the previously approved Feasibility Study (FS). Instead, the FFS will proceed directly to the evaluation of feasible remediation alternatives. Consistent with discussions and meeting with Ecology, the FFS will focus on evaluating a select number of remediation alternatives that are considered potentially feasible to address petroleum hydrocarbon impacts in soil and groundwater at the Site. These remediation alternatives include:

- 1. Excavation of secondary source area to the degree practicable, capping of soils, and monitored natural attenuation to address downgradient groundwater;
- 2. Capping of the source area to contain site soils and Monitored Natural Attenuation to address downgradient groundwater;
- 3. Subsurface slurry wall containment barrier and capping of the source area and monitored natural attenuation to address downgradient groundwater; and

4. Enhanced natural attenuation through the use of an oxygen enhancer for downgradient groundwater.

The combinations of two or several remediation alternatives listed above are considered potentially appropriate to address hydrocarbon impacts along with the use of Institutional Controls at the Site. These alternatives will be evaluated in the FFS as standalone cleanup options. The alternatives consist of technologies or combination of technologies to address the source area soils and LPH, combined with one or two technologies to address downgradient groundwater.

The remediation technologies employed in these alternatives are described below.

EXCAVATION OF SECONDARY SOURCE MATERIAL

Remedial excavation involves excavation, transport, and off-site disposal of affected soil. Impacted soil could be removed based on assumptions specific to each of three options: (1) "secondary source area" removal, (2) removal of known source(s), and (3) comprehensive excavation. The limits of practicable soil removal will be evaluated in the FFS in accordance with MTCA's permanence criteria.

SLURRY WALL

A subsurface slurry barrier wall is a relatively narrow (6 inches to 3 feet thick), subsurface, low-permeability barrier wall that is installed using slurry-trenching technology. The wall is designed to impede groundwater flow and eliminate the potential migration of LPH. A slurry wall would be used in conjunction with a remediation system to address impacted soil and/or groundwater. A slurry wall would likely be constructed by mixing native soils with bentonite clay and possibly other admixtures in situ in an alignment partially surrounding the source area. The slurry wall would ideally be constructed such that the bottom of the wall is keyed to an aquitard; however, a "hanging" slurry wall, in which the bottom of the wall is in the aquifer at an appropriate depth below impacted material, may be acceptable, particularly to contain LPH. If the slurry wall is considered as one of the remedial options, groundwater wells will be installed with screens below the bottom of the slurry wall on and off-property to monitor the groundwater quality.

Geotechnical data necessary to design a slurry wall include lithologic descriptions at regular intervals; depth to an aquitard; permeability of the native material at the proposed bottom of the slurry wall; and suitability of the native material as aggregate. These data will be collected during the Data Gap Supplemental Investigation.

MONITORED NATURAL ATTENUATION

Monitored natural attenuation (MNA) is a remedial technology that can lead to permanent destruction of IHSs in a noninvasive manner. The approach relies on natural processes, including biodegradation by indigenous organisms and adsorption to soil, to retard and degrade organic compounds and to retard and immobilize metals in combination with appropriate monitoring. Ecology allows the use of MNA only in conjunction with source removal or control. This technology is especially appropriate to the petroleum hydrocarbon plume at the Site. The

depositional history of the shallow subsurface in the vicinity of the Property has resulted in a substantial amount of natural organic materials in the subsurface. This organic material supports natural microorganisms that can support natural biodegradation of groundwater constituents. The high organic content of soils at the Site is expected to provide a favorable environment for effective natural biodegradation of organic constituents that may be present in affected groundwater.

A monitoring network and program are typically associated with this technology to ensure that hazardous constituent degradation is effective and that cleanup levels are attained. Guidance by Ecology (July 2005) provides technical recommendations regarding the types of monitoring parameters and analyses useful for evaluating the effectiveness of MNA and will be used during data gaps sampling to determine the viability of this approach for the FFS.

OXYGEN ENHANCED BIOREMEDIATION

MNA in some cases may not result in degradation of IHAs that meet cleanup levels or meet cleanup levels in an acceptable time frame. In these cases it may be necessary to enhance the natural biodegradation processes. Since hydrocarbon compounds degrade most quickly by aerobic processes, groundwater needs to be well oxygenated to maximize biodegradation. Where groundwater dissolved oxygen (DO) concentrations are too low, at some sites the addition of air or oxygen to the groundwater can increase the DO and thereby enhance the natural processes. A common means of increases the oxygen content of groundwater is to use a manufactured time release electron acceptor, for example a magnesium peroxide-based powder that slowly releases oxygen when hydrated. This slow release of oxygen is intended to increase the DO concentration in groundwater, facilitating conditions favorable to microbes that consume contaminants such as diesel-range hydrocarbons. Such products can be applied in three ways: (1) by injection into the aquifer in slurry form, typically through direct-push points; (2) by placing a bag ("sock") containing the product in an existing well; and (3) by mixing the product into soil in an excavation.

Data necessary to determine applicability of a time release electron acceptor and an application regime are specified by the supplier. Typical parameters of interest in addition to contaminant concentrations include pH, total organic carbon, and temperature. These data can be collected during sampling of existing wells. The potential effectiveness of this remedial technology will be evaluated in the Focused Feasibility Study.

8.2.2 Contents of FFS

A proposed table of contents for the FFS is presented below.

- 1.0 INTRODUCTION
 - 1.1 Overview
 - 1.2 Purpose and Scope of Work
 - 1.3 Report Organization
- 2.0 BACKGROUND

- 2.1 Site Description and History
- 2.2 Nature and Extent of Contamination
 - 2.2.1 Geology
 - 2.2.2 Hydrogeology
 - 2.2.3 Nature and Extent of Contamination
- 2.3 Beneficial Water and Land Use
- 2.4 MTCA Risk-Based Evaluation (a list of potential applicable or relevant and appropriate requirements is provide in Appendix H).
- 2.5 Ecological Setting and Terrestrial Ecological Evaluation

3.0 FEASIBILITY STUDY SCOPING

- 3.1 Remedial Action Objectives
- 3.2 Regulatory Requirements
 - 3.2.1 Ecology Requirements
 - 3.2.2 Applicable or Relevant and Appropriate Requirements
 - 3.2.3 Permits
- 3.3 Cleanup Levels
 - 3.3.1 Indicator Hazardous Substances
 - 3.3.2 Site-Specific Cleanup Levels
 - 3.3.3 Remediation Levels
- 3.4 Points of Compliance
- 3.5 Areas Needing Remediation
- 4.0 CLEANUP ALTERNATIVES
 - 4.1 Capping with Monitored Natural Attenuation
 - 4.2 Slurry Wall Containment and Capping with Monitored Natural Attenuation
 - 4.3 Secondary Source Excavation and Capping with Monitored Natural Attenuation
 - 4.4 Expanded Excavation in Accordance with MTCA's Permanence Criteria
 - 4.5 Enhanced Natural Attenuation Using Enhanced Aerobic Bioremediation.
 - 4.6 Institutional Controls

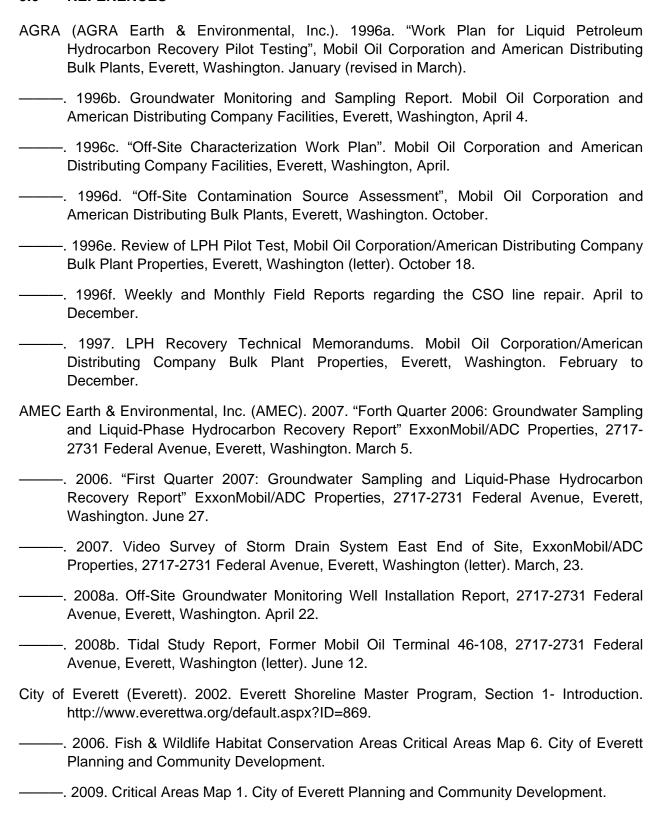
5.0 DETAILED EVALUATION OF CLEANUP ACTION ALTERNATIVES

- 5.1 Evaluation Criteria
 - 5.1.1 MTCA Threshold Requirements
 - 5.1.2 MTCA Disproportionate Cost Analysis
- 5.2 Individual Analysis of Alternatives
- 5.3 Comparative Analysis of Alternatives
- 5.4 Summary Analysis of Alternatives
- 6.0 Recommended Remedial Action Alternative

REFERENCES LIMITATIONS

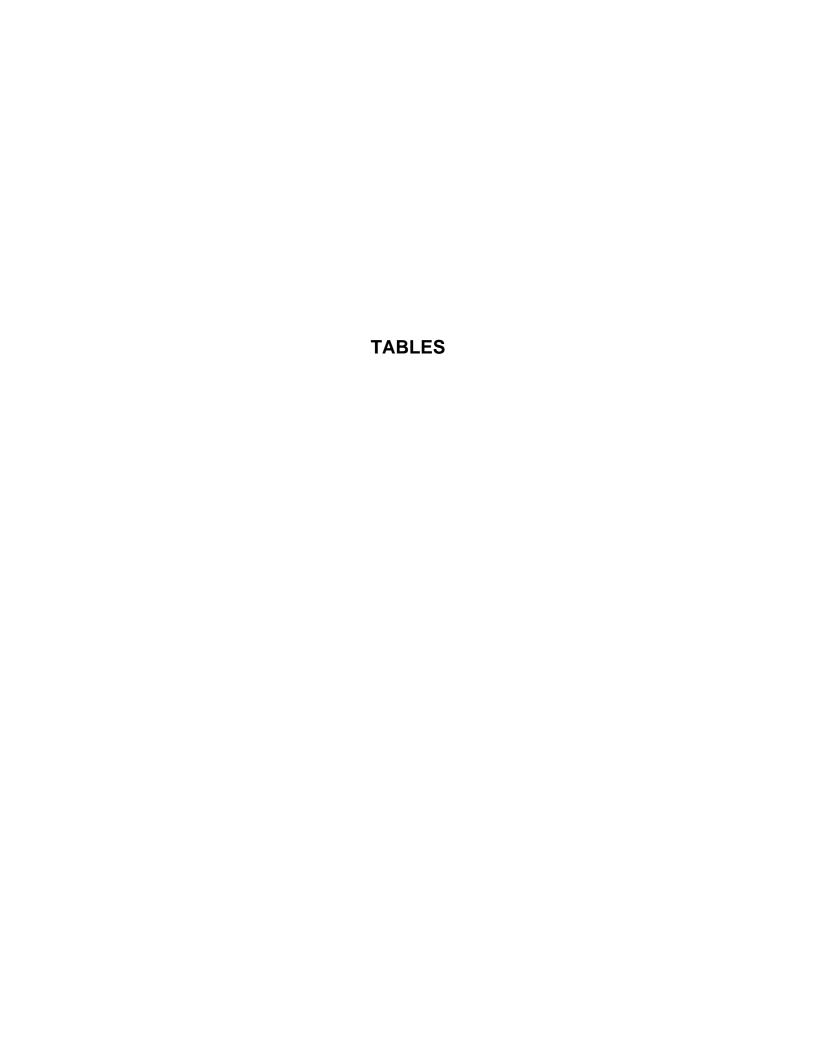
Appendix A Cost Estimates for FFS Remediation Alternatives

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Chronology of Historical On-Site Environmental Investigations and Remedial Actions Table 1

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
May-85	Rittenhouse- Zeman and Associates, Inc. (RZA)	ExxonMobil Parcel		Borings, monitoring well installation	2-inch diameter monitoring wells B-1 through B-5 (MW-1 through MW-5 in several reports) installed.	B-1, B-2, B-4, and B-5. Petroleum odor noticed in borings, evidence found of contamination below groundwater table.
Mar-88	RZA	ExxonMobil Parcel		Borings, monitoring well installation	2-inch diameter monitoring wells MW-6 through MW-18 installed.	Soil and groundwater samples collected. LPH (1.29 feet) measured in MW-14.
Apr-88	RZA	ExxonMobil Parcel		Recovery trench installation, SVE and groundwater treatment system test (oil-water separator and air stripper)	Installation of recovery trench near MW-14, soil vapor extraction system and groundwater treatment system to evaluate feasibility of extracting LPH	Decommissioned in 1998 during construction of low- permeability cap at the Property.
May-88	RZA	ExxonMobil Parcel		Infiltration gallery, pumping subsurface fluids	Infiltration gallery installed in the vicinity of MW-14. Subsurface fluids were pumped with a vacuum truck from the sumps.	The gallery was T-shaped and 45 ft long with two 55 gal drums installed at both ends as sumps. 1,400 gal of liquid removed, 50 gal was LPH. As a result, LPH thickness in MW-14 decreased to 0.40 ft by August 1988.
Mar-89	RZA	ExxonMobil Parcel		Automated groundwater extraction and treatment system	An automated groundwater extraction and treatment system was installed in the location of the infiltration gallery. The system included fluid extraction sump stationed in RW-1 (formerly MW-14), oil-water separator, air stripper, and reinfiltration gallery.	The groundwater extraction and treatment system was shut down in March 1990 due to flooding of the re-infiltration gallery, and has not been restarted.

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Table 1 Chronology of Historical On-Site Environmental Investigations and Remedial Actions

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Jan-90	Environmental Science and Engineering, Inc. (ESE)	ADC Parcel		Borings	Hand auger AD-01 through AD-19	Soil samples collected.
Feb-90	ESE	ADC Parcel		Borings, monitoring well installation	HSA borings W-1 through W-7. 2-inch diameter monitoring wells W-1 through W-6 installed.	W-7 was backfilled.
Jun-90	ESE	ADC Parcel		Hand-auger borings	Hand-auger borings W-8 through W-17 hand	No soil data found for W-8 through W-17.
Oct-90	RZA	ExxonMobil Parcel		Shallow grid soil sampling, bio- feasibility study	Hand auger B-1 through B-25. Two soil sample studies for the purpose of conducting a slurry flask bio-feasibility study.	0-3 ft bgs. Rapid biodegradation of TPH-G fraction was observed. Biodegradation of TPH (undifferentiated) was not achieved.
Nov-90	Unknown	ExxonMobil Parcel		Monitoring wells decommissioning	B-3 (MW-3), B-4 (MW-4), and MW-7 destroyed	No documentation of well decommissioning.
Mar through June-91	RZA	Parcels surrounding ExxonMobil Parcel		Borings, monitoring well installation	2-inch diameter monitoring wells MW-19 through MW-24 and 4-inch diameter monitoring wells MW-27 through MW-30 installed. Soil boring B-21-91 advanced.	MW-25 and MW-26 were inaccessible or dry and later renamed as B-25 and B-26. No well decommissioning records were found.
Jun-91	RZA and ESE	The Property		Quarterly groundwater monitoring	Groundwater monitoring event. New 2-inch diameter monitoring wells MW-25 and MW-26 installed. Gauged wells: RW-1, B-1, B-2, B-5, MW-6, MW-8 through MW-13, MW-15 through MW-18, AD-19, W-1 through W-6, and W-8 through W-15.	B-1, MW-8, AD-19, W-1, W-6, W-9, W-11, W-12, W-13, and W-15 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA.

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Table 1 Chronology of Historical On-Site Environmental Investigations and Remedial Actions

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Nov-91	RZA AGRA	ExxonMobil Parcel		Borings, recovery well	8-inch diameter recovery well RW-2 installed. Deep soil borings B-1A, B-8A, and B-15A advanced.	Soil borings advanced in vicinity of existing wells B-1, B-8, and B-15. No analytical data found for this event.
Dec-91	RZA AGRA Earth & Environmental, Inc. (RZA AGRA)	ExxonMobil Parcel		Quarterly groundwater monitoring, aquifer and tidal study	Quarterly groundwater monitoring. Gauged wells: RW-1, B-1, B-2, B-5, MW-6, MW-8 through MW-13, MW-15 through MW-30, and AD-19. 24-hour pumping from MW-10 at a rate of 1 to 2 gpm and measuring response in MW-18, RW-1, and RW-2 for 48 hours.	B-1, MW-8, MW-11, MW-26, MW-27, MW-29, and AD-19 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA. Hydraulic conductivity at the Site was estimated as 4 to 9.5 ft/day. Minimum tidal influence was observed.
1992	RZA AGRA			Discussions with Ecology	Ecology discussed enforcement with Mobil and RZA AGRA. Ecology decided to allow site to go independent.	
Dec-93	RZA AGRA	West of ExxonMobil Parcel		Off-Property borings, monitoring well installation, GPR survey	2-inch diameter monitoring wells MW-31 through MW-33 and MW-35 through MW-37 were installed; B-34 advanced and backfilled. GPR survey was conducted to assess whether underground product lines had been removed.	Survey did not identify any subsurface linear features.
Dec-93	RZA AGRA	ExxonMobil Parcel and off- site property to the west		Quarterly groundwater monitoring	Groundwater monitoring event. Gauged wells B-1, B-2, MW-6, MW-8 through MW-13, MW-15 through MW-18, MW-27 through MW-33, MW-35 through MW-37.	B-1, MW-27, and MW-29 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA.

ExxonMobil/ADC Everett Facility Project No.: 8-915-15716-C

Table 1 **Chronology of Historical On-Site Environmental Investigations and Remedial Actions**

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Dec-93	RZA AGRA	West of ExxonMobil Parcel		Test pits, recovery trench	Excavated five test pits TP-1 through TP-5. Recovery trench installation along the western border of ExxonMobil Parcel.	Monitoring well MW-21 was decommissioned during the recovery trench installation activities. However, a 2002 decommissioning record was found that stated that MW-21 was decommissioned in 2002.
1995				Agreed Order DE- 95TC-N402		Required evaluation of LPH.
Jul-95	RZA AGRA	ADC Parcel		Quarterly groundwater monitoring	Groundwater monitoring event. Gauged wells: W-3, W-5, W-9, W-10, W-12 through W-15.	W-9, W-12, and W-13 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA.
Oct-95	U.S. Coast Guard Puget Sound Marine Safety Office & City of Everett	North of the Property		Investigation of petroleum product discharge into Everett Harbor	Camera surveys of the sewer lines	Outfall located approximately 175 yards northwest of the ADC parcel, section of Combined Sewer Outflow (CSO) line with LPH seepage.
Nov-95	RZA AGRA	Site		Groundwater monitoring	Groundwater monitoring event. Gauged wells: RW-1, B-1, B-2, MW-6, MW-8 through MW-13, MW-15 through MW-18, and MW-27 through MW-37.	B-1, MW-18, MW-29, and MW-30 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA.
Dec-95	RZA AGRA	Site		Groundwater monitoring	Groundwater monitoring event. Gauged wells: RW-2, B-2, MW-8, MW-9, MW-18, MW-15 through MW-18, MW-27, and MW-28.	RW-2, MW-9, MW-18, and MW-28 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA.

Table 1 Chronology of Historical On-Site Environmental Investigations and Remedial Actions

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Mar-96	AGRA	North of the Property		Borings	Direct-push soil borings GP-1 through GP-13. Borings associated with the CSO line repair.	The collected soil sample results indicated that soil surrounding the damaged portion of the CSO line were impacted with petroleum hydrocarbons. LPH accumulation was noticed in temporary screens installed in soil borings. No groundwater samples were collected from temporary screens.
Apr-96	City of Everett			Meeting	Meeting held to discuss options for repairing the section of CSO line.	Replacement of the settled portion of the line and slip lining of the remaining portion of the line was decided.
May-96	AGRA	ADC Parcel		Borings	Bobcat borings BB-1 through BB-14.	Soil samples collected.
Jun-96	AGRA	North of the Property		CSO line repairs	Excavation of settled portion of pipe replaced. Slip-lining of remaining CSO line. CSO line excavation dewatering.	1,450,800 gal of groundwater and 23,050 gal of LPH were removed during CSO line excavation and dewatering.
Jun-96	AGRA	ADC Parcel		Borings, monitoring wells, and test pits	4-inch diameter recovery well VRW-1 and 2-inch diameter monitoring well MW-38 installed. Seven test pits TP-1-96 through TP-7-96 excavated.	Wells were installed on the northeast corner of the property. Test pits were throughout the ADC Parcel.
Jun-96	AGRA	LPH Vacuum Recovery Pilot Test		LPH vacuum recovery pilot test	14-day test included SVE and groundwater/LPH pumping system.	125 gal of LPH and 28,228 gal of groundwater removed from VRW-1 during test.
Aug-96	AGRA	Site		Monitoring wells	Gauged wells at the property.	LPH found in B-1, VRW-1, MW-27, MW-29, MW-30, MW-38, W-1, W-9, W-15.

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Table 1 **Chronology of Historical On-Site Environmental Investigations and Remedial Actions**

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Feb-97	PTI Environmental Services (PTI)	Site		LPH recovery technical memorandum	Technical memorandum to summarize environmental investigations, LPH recovery activities, and geology.	PTI concluded that long-term, passive (LPH only) recovery may be the most effective method of LPH recovery.
Nov-97 Jan-98	Pacific Environmental Group, Inc. (PEG)	Kimberly-Clark Property		Boring, monitoring well	Direct push borings Probe-1 through Probe-15. 2-inch diameter HSA monitoring wells KC-1 and KC-2 inside the KC warehouse.	Groundwater samples were collected from temporary screens installed in each boring. LPH not identified in soil borings or monitoring wells. TPH-D and TPH-O were detected above MTCA Method A cleanup levels in borings advanced in the vicinity of repaired CSO line. Samples not collected in vicinity of former ASTs.
1998				Agreed Order DE98TC-P-N223		Required remedial investigation/focused feasibility study.
Jul-98	Exponent	Site		Remedial Investigation and Focused Feasibility Study	Report	Exponent recommended the installation of LPH recovery trenches and capping the property.
Nov-98	Kleinfelder, Inc. (Kleinfelder)	ADC Parcel		Survey, geotechnical evaluation	Initial survey. Asbestos survey prior to demolition.	Demolition activities included four buildings on the ADC parcel. Demolition completed in January 1999.

Table 1 **Chronology of Historical On-Site Environmental Investigations and Remedial Actions**

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Dec-98	Kleinfelder	The Property	Reference	Interim remedial action	Removed TPH-impacted soil, graded the property, removed purge water.	162 tons of contaminated shallow soil and vegetation removed from within the ADC firewall area during demolition and transported to TPS Technologies facility for disposal. 3.5 tons of class 3 petroleum-contaminated soil taken to CRS Associated. Marine Services, Inc. removed 110 gal of purge water.
1999	Kleinfelder	The Property		Interim remedial action (continued)	Monitoring well abandonment. Interceptor trench construction along the western and northern property boundaries. Low-permeability cap construction over the property. Recovery wells LPH-1 through LPH-9 installed in interceptor trench. Storm collection system that connects to the City of Everett sewer system was installed.	Monitoring wells abandoned (MW-6, MW-8, MW-9, MW-12, MW-13, MW-15, MW-16, MW-17, MW-38, WP-1, B-1, B-2, W-4, W-8, W-11, W-12, W-14, AD-11, AD-12, AD-13, AD-15, AD-19, W-10, W-15, and MW-40). Completed site grading, installation of two layers of geotextile fabric, asphalt-treated base material, and paving fabric and asphalt cap.
Oct-99	Kleinfelder	The Property		Monitoring wells installation	Monitoring wells W-10R, W-15R, and MW-40R.	Wells installed to replace wells W-10, W-15, and MW-40.
Dec-99	Dames and Moore	To the south and southeast from the Property		Geotechnical drilling and piezometer installation	DM-6, DM-7, and DM-8 were sampled for environmental samples.	Work associated with California Street Overcrossing (CSTO) Project.

Table 1 Chronology of Historical On-Site Environmental Investigations and Remedial Actions

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Sep-00	URS Corporation (URS)	To the south, east, and southeast from the Property		Borings	Phase II investigation for the CSTO Project. Push- probe borings UG-1 through UG-12.	Groundwater samples collected from temporary screens installed in UG-2 and UG-8. Estimated 7,600 cubic yards of petroleum-contaminated soil present along the overcrossing alignment.
Jul-01	URS	Johnston Petroleum parcel		Borings	Phase II investigation for Johnson Petroleum parcel. Push-probe borings JP-1 through JP-7.	Soil samples collected. Groundwater samples collected from JP-1, JP-4, and JP-7. No significant contamination found.
Feb-02	Environmental Resolutions, Inc. (ERI)	Site and vicinity		Monitoring wells decommissioning, monitoring well re- installment	Abandonment of monitoring wells (MW-22, MW-23, MW-24, MW-35, and MW-37) and piezometer DM-6 due to proximity to the CSTO Project. Re-installed well W-2.	No soil samples taken during W-2 installation.
2002	Reid Middleton	CSTO		Memorandum to Ecology	Southeast corner of the asphalt cap over the ExxonMobil Parcel removed. Steel piles for concrete foundation were installed.	No information regarding contaminant soil excavation and removal was found.
2002- 2007	Kleinfelder, ERI, AMEC Earth & Environmental, Inc. (AMEC)	Site		Groundwater monitoring	Monthly LPH gauging and quarterly groundwater monitoring.	LPH greater than 0.02 ft thick is bailed manually and oleophilic socks are replaced.
Jul-02	ERI	West of the ExxonMobil Parcel		Well decommissioning	Monitoring wells MW-20, MW-21, and one unidentified well were decommissioned.	The record contradicts the records that indicate that MW-21 was decommissioned during the December 1993 recovery trench installation.

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Table 1 **Chronology of Historical On-Site Environmental Investigations and Remedial Actions**

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
2007- present	AMEC	Site		Groundwater monitoring	AMEC request to change to semiannual groundwater monitoring.	Request was accepted by Ecology.
2008	AMEC	West of the property		Monitoring wells	Off-property monitoring wells MW-A1 and MW-2A installed on the west side of Federal Avenue.	Monitoring wells MW-A1 and MW-2A are incorporated into existing groundwater monitoring network.
Feb-08	AMEC	Site		Tidal study	Tidal response was measured in W-3, W-6, MW-11, MW-28, and MW-40R	Minimal response in each well, except MW-11.
Jun-08	AMEC	Site		Well Head elevations survey	True North Land Surveying of Seattle, Washington, surveyed recovery and monitoring wells located on-site	Recovery wells LPH-1 through LPH-9 and monitoring wells W-1, W-2, W-3, W-6, W-10R, MW-10, MW-11, W-15R, W-17, RW-2, MW-19, MW-27, MW-28, MW-29, MW-30, MW-40R, and MW-A1 and MW-A2.
Jun-08	Floyd Snider	North-Northeast of the property		Excavation and disposal of PCS and dewatering the excavation	Soil associated with Puget Sound Outfall 5 (PSO 5) Overflow Structure project was excavated and disposed off. In addition, dewatering also occurred during excavation.	Soil was field-screen. Soil that exhibited obvious signs of contamination was disposed off as Class II soil without sampling. Soil that appeared to be "clean", was sampled and then disposed as Class II soil. Water from the excavation was sampled for the City sewer discharge requirements.
2009	AMEC	Site		Proposed 2009 Agreed Order		Data Gap Investigations, followed by Focused Feasibility Study, and CAP.

Table 1 Chronology of Historical On-Site Environmental Investigations and Remedial Actions

Abbreviations

ADC = American Distributing Company

AST = Above Ground Storage Tank

bgs = below ground surface

CAP = Cleanup Action Plan

CSO = Combined Sewer Outflow

CSTO = California Street Overcrossing

Ecology = Washington State Department of Ecology

ft = feet

gal = gallons

gpm = gallons per minute

GPR = Ground Penetrating Radar

HSA = Hollow Stem Auger

KC = Kimberly-Clark

LPH = Liquid Petroleum Hydrocarbons

MTCA = Model Toxics Control Act

PCS = petroleum-contaminated soil

SVE = Soil Vapor Extraction

TPH = Total Petroleum Hydrocarbons

TPH-D = Total Petroleum Hydrocarbons-Diesel Range Organics

TPH-G = Total Petroleum Hydrocarbons-Gasoline Range Organics

TPH-O = Total Petroleum Hydrocarbons-Residual Range Organics

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Table 2 Analytical Results for Total Petroleum Hydrocarbons in Soil

	Depth		Oil and Grease	TPH	TPH-Diesel	TPH-Oil
Sample ID	(feet)	Date Sampled	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
MTCA Method A Cle	eanup Level	Unrestricted/Residential	2,000	2,000	2,000	2,000
AD-1	0.5 to 1	1/15/1990		780		
AD-1	3	1/15/1990		3,900		
AD-1	3	1/15/1990		2,380 ¹		
AD-2	0.5 to 1	1/15/1990		250		
AD-2	2.5 to 3	1/15/1990		280		
AD-3	0.5 to 1	1/15/1990		31		
AD-3	1.5 to 2	1/15/1990		9		
AD-4	0.5 to 1	1/15/1990		720		
AD-5	0.5 to 1	1/15/1990		8,800		
AD-5	1.5 to 2	1/15/1990		1,900		
AD-5	2.5 to 3	1/15/1990		2,300		
AD-5	2.5 to 3	1/15/1990		2,100 ¹		
AD-6	0.5 to 1	1/15/1990		2,700		
AD-7	0.5 to 1	1/15/1990		5,800		
AD-8	0.5 to 1	1/15/1990		1,600		
AD-8	2.5 to 3	1/15/1990		2,700		
AD-8	2.5 to 3	1/15/1990		1,530 ¹		
AD-8	4.5 to 5	1/15/1990		6,200		
AD-8	4.5 to 5	1/15/1990		7,080 ¹		
AD-9	0.5 to 1	1/15/1990		630		
AD-9	1.5 to 2	1/15/1990		4,400		
AD-10	0.5 to 1	1/15/1990		33,000		
AD-11	0.5 to 1	1/15/1990		8,000		
AD-11	1 to 1.5	1/15/1990		12,000		
AD-12	0.5 to 1	1/15/1990		230		
AD-12	2.5 to 3	1/15/1990		14,000		
AD-12	2.5 to 3	1/15/1990		9900 ¹		
AD-12	3 to 3.5	1/15/1990		16,000		
AD-12	3 to 3.5	1/15/1990		12,800 ¹		
AD-13	0.5 to 1	1/15/1990		4,400		
AD-13	2 to 2.5	1/15/1990		27,000		
AD-13	2 to 2.5	1/15/1990		24,900 ¹		
AD-13	0.5 to 1	1/15/1990		13,000		
AD-14	2 to 2.5	1/15/1990		17,000		
AD-14	2 to 2.5	1/15/1990		9,500 ¹		
AD-14 AD-15	0.5 to 1	1/15/1990		61		
	-		+	7 1		
AD-15	0.5 to 1	1/15/1990		-		
AD-15	2.5 to 3	1/15/1990		2,400		
AD-15	2.5 to 3	1/15/1990		3,340 1		
AD-16	0.5 to 1	1/15/1990		2,200		
AD-16	0.5 to 1	1/15/1990		1,370 ¹		
AD-17	0.5 to 1	1/15/1990		8,500		
AD-17	0.5 to 1	1/15/1990		8,100 ¹		
AD-18	0.5 to 1	1/15/1990		24		
AD-18	4 to 4.5	1/15/1990		520		
AD-19	0.5 to 1	1/15/1990		23,000		

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Table 2 Analytical Results for Total Petroleum Hydrocarbons in Soil

MTCA Method A Cleanu	1 to 1.5 0 to 1.5 1.5 to 2 0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 1.5 to 3 0 to 1.5 1.5 to 3 1.5 to 3	Date Sampled Unrestricted/Residential 1/15/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990	(mg/kg) 2,000	(mg/kg) 2,000 100,000 2,117 446 90.6 213 831 65.2 701 428 434 126 174 469 643	(mg/kg) 2,000	(mg/kg) 2,000
AD-19 1 B-1_Soil Grab 0 B-1_Soil Grab 1 B-2_Soil Grab 0 B-3_Soil Grab 0 B-3_Soil Grab 1 B-4_Soil Grab 0 B-5_Soil Grab 0 B-5_Soil Grab 0 B-6_Soil Grab 0 B-7_Soil Grab 0 B-8_Soil Grab 1 B-9_Soil Grab 1 B-9_Soil Grab 1 B-10_Soil Grab 1 B-10_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 1 B-12_Soil Grab 1 B-12_Soil Grab 1	1 to 1.5 0 to 1.5 1.5 to 2 0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 1.5 to 3 0 to 1.5 1.5 to 3 1.5 to 3	1/15/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990		100,000 2,117 446 90.6 213 831 65.2 701 428 434 126 174 469		
B-1_Soil Grab 0 B-1_Soil Grab 1 B-2_Soil Grab 0 B-3_Soil Grab 0 B-3_Soil Grab 1 B-4_Soil Grab 0 B-5_Soil Grab 0 B-5_Soil Grab 0 B-6_Soil Grab 0 B-7_Soil Grab 0 B-8_Soil Grab 1 B-9_Soil Grab 1 B-9_Soil Grab 1 B-10_Soil Grab 1 B-10_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 1 B-12_Soil Grab 1	0 to 1.5 1.5 to 2 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990		2,117 446 90.6 213 831 65.2 701 428 434 126 174 469		
B-1_Soil Grab	1.5 to 2 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990		446 90.6 213 831 65.2 701 428 434 126 174 469		
B-2_Soil Grab 0 B-3_Soil Grab 0 B-3_Soil Grab 1 B-4_Soil Grab 0 B-5_Soil Grab 0 B-6_Soil Grab 0 B-7_Soil Grab 0 B-8_Soil Grab 0 B-8_Soil Grab 1 B-9_Soil Grab 1 B-9_Soil Grab 1 B-10_Soil Grab 1 B-10_Soil Grab 0 B-11_Soil Grab 1 B-11_Soil Grab 1 B-12_Soil Grab 1 B-12_Soil Grab 1	0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990		90.6 213 831 65.2 701 428 434 126 174 469		
B-3_Soil Grab 0 B-3_Soil Grab 1 B-4_Soil Grab 0 B-5_Soil Grab 0 B-6_Soil Grab 0 B-7_Soil Grab 0 B-8_Soil Grab 0 B-8_Soil Grab 1 B-9_Soil Grab 1 B-9_Soil Grab 1 B-10_Soil Grab 0 B-10_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 1 B-12_Soil Grab 1	0 to 1.5 1.5 to 3 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990		213 831 65.2 701 428 434 126 174	 	
B-3_Soil Grab 1 B-4_Soil Grab 0 B-5_Soil Grab 0 B-6_Soil Grab 0 B-7_Soil Grab 0 B-8_Soil Grab 1 B-9_Soil Grab 1 B-9_Soil Grab 1 B-10_Soil Grab 1 B-10_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 1 B-12_Soil Grab 1 B-12_Soil Grab 1	1.5 to 3 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 1.5 to 3 1.5 to 3 1.5 to 3 1.5 to 3	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990		831 65.2 701 428 434 126 174 469	 	
B-4_Soil Grab 0 B-5_Soil Grab 0 B-6_Soil Grab 0 B-7_Soil Grab 0 B-8_Soil Grab 0 B-8_Soil Grab 1 B-9_Soil Grab 0 B-9_Soil Grab 1 B-10_Soil Grab 1 B-10_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 1 B-12_Soil Grab 1 B-12_Soil Grab 1	0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990	 	65.2 701 428 434 126 174 469	 	
B-5_Soil Grab 0 B-6_Soil Grab 0 B-7_Soil Grab 0 B-8_Soil Grab 0 B-8_Soil Grab 1 B-9_Soil Grab 0 B-9_Soil Grab 1 B-10_Soil Grab 0 B-10_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 0 B-12_Soil Grab 1	0 to 1.5 0 to 1 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 2 0 to 1.5 1.5 to 2 0 to 1.5	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990	 	701 428 434 126 174 469	 	
B-6_Soil Grab	0 to 1.5 0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 2 0 to 1.5 1.5 to 2 0 to 1.5 1.5 to 3	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990	 	428 434 126 174 469	 	
B-7_Soil Grab 0 B-8_Soil Grab 0 B-8_Soil Grab 1 B-9_Soil Grab 0 B-9_Soil Grab 1 B-10_Soil Grab 0 B-10_Soil Grab 1 B-11_Soil Grab 1 B-11_Soil Grab 1 B-12_Soil Grab 0 B-12_Soil Grab 1	0 to 1.5 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 2 0 to 1.5 1.5 to 2 1.5 to 3	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990	 	434 126 174 469	 	
B-8_Soil Grab 0 B-8_Soil Grab 1 B-9_Soil Grab 0 B-9_Soil Grab 1 B-10_Soil Grab 0 B-10_Soil Grab 1 B-11_Soil Grab 0 B-11_Soil Grab 1 B-12_Soil Grab 0 B-12_Soil Grab 1	0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 2 0 to 1.5 1.5 to 2	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990		126 174 469		
B-8_Soil Grab 1 B-9_Soil Grab 0 B-9_Soil Grab 1 B-10_Soil Grab 0 B-10_Soil Grab 1 B-11_Soil Grab 0 B-11_Soil Grab 1 B-12_Soil Grab 0 B-12_Soil Grab 1	1.5 to 3 0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 2 0 to 1.5 1.5 to 3	10/9/1990 10/9/1990 10/9/1990 10/9/1990 10/9/1990		174 469		
B-9_Soil Grab 0 B-9_Soil Grab 1 B-10_Soil Grab 0 B-10_Soil Grab 1 B-11_Soil Grab 0 B-11_Soil Grab 1 B-12_Soil Grab 0 B-12_Soil Grab 1	0 to 1.5 1.5 to 3 0 to 1.5 1.5 to 2 0 to 1.5 1.5 to 3	10/9/1990 10/9/1990 10/9/1990 10/9/1990		469		
B-9_Soil Grab 1 B-10_Soil Grab 0 B-10_Soil Grab 1 B-11_Soil Grab 0 B-11_Soil Grab 1 B-12_Soil Grab 0 B-12_Soil Grab 1	1.5 to 3 0 to 1.5 1.5 to 2 0 to 1.5 1.5 to 3	10/9/1990 10/9/1990 10/9/1990				
B-10_Soil Grab 0 B-10_Soil Grab 1 B-11_Soil Grab 0 B-11_Soil Grab 1 B-12_Soil Grab 0 B-12_Soil Grab 1	0 to 1.5 1.5 to 2 0 to 1.5 1.5 to 3	10/9/1990 10/9/1990		643		
B-10_Soil Grab 1 B-11_Soil Grab 0 B-11_Soil Grab 1 B-12_Soil Grab 0 B-12_Soil Grab 1	1.5 to 2 0 to 1.5 1.5 to 3	10/9/1990				
B-11_Soil Grab 0 B-11_Soil Grab 1 B-12_Soil Grab 0 B-12_Soil Grab 1	0 to 1.5 1.5 to 3			206		
B-11_Soil Grab 1 B-12_Soil Grab 0 B-12_Soil Grab 1	1.5 to 3	40/0/4000		231		
B-12_Soil Grab 0 B-12_Soil Grab 1		10/9/1990		323		
B-12_Soil Grab 1		10/9/1990		406		
	0 to 1.5	10/9/1990		191		
	1.5 to 3	10/9/1990		11,775		
B-13_Soil Grab 0	0 to 1.5	10/9/1990		277		
B-13_Soil Grab 1	1.5 to 3	10/9/1990		15.9		
B-14_Soil Grab 0	0 to 1.5	10/9/1990		212		
B-14_Soil Grab 1	1.5 to 3	10/9/1990		128		
B-15_Soil Grab 0	0 to 1.5	10/9/1990		132		
B-15_Soil Grab 1	1.5 to 3	10/9/1990		17		
B-16_Soil Grab 0	0 to 1.5	10/9/1990		1,898		
B-16_Soil Grab 1.5	.5 to 2.5	10/9/1990		9,718		
	0 to 1.5	10/9/1990		1,513		
B-17_Soil Grab 1	1.5 to 3	10/9/1990		2,139		
	0 to 1.5	10/9/1990		46		
	1.5 to 3	10/9/1990		738		
	0 to 1.5	10/9/1990		626		
	1.5 to 3	10/9/1990		10,577		
B-20_Soil Grab 0	0 to 1.5	10/9/1990		117		
B-20_Soil Grab 1	1.5 to 3	10/9/1990		46.9		
	0 to 1.5	10/9/1990		2,116		
	1.5 to 3	10/9/1990		1,974		
B-21-91	5	6/24/1991		12,000		
B-21-91	5	6/24/1991		4,700 ¹		
B-21-91	6	6/24/1991		27		
B-21-91	6	6/24/1991		10 U		
	0 to 1.5	10/9/1990		360		
	1.5 to 3	10/9/1990		1,800		
	0 to 1.5	10/9/1990		1,691		
	1.5 to 3	10/9/1990		6,421		
	0 to 1.5	10/9/1990		560		

 Table 2
 Analytical Results for Total Petroleum Hydrocarbons in Soil

	Depth		Oil and Grease	TPH	TPH-Diesel	
Sample ID	(feet)	Date Sampled	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
MTCA Method A Clea	anup Level	Unrestricted/Residential	2,000	2,000	2,000	2,000
B-25_Soil Grab	0 to 1.5	10/9/1990		76		
B-25_Soil Grab	1.5 to 3	10/9/1990		29.8		
B-34/S-2	4 to 5.5	12/6/1993		-	500	
B-34/S-5	12.5 to 14	12/6/1993		-	4,800	
CSO Log yard backfill		6/27/1996		-	3,910	586
CSO Log yard N-2		7/1/1996			58.9	221
CSO Log yard pipe		6/27/1996		-	45.2	25 U
CSO Log yard W-1		7/1/1996		1	27	67.3
DM-6		12/6/1999		1	44.3	25 U
DM-7		12/8/1999			482	225
DM-8		12/1/1999		-	44.4	102
GP-1	10	3/20/1996		-	276	
GP-2	11.5	3/20/1996			322	
GP-3	6	3/20/1996			1,370	
GP-4	6	3/20/1996			297	
GP-5	3	3/20/1996			30.4	
GP-5	8.5	3/20/1996			703.2	
GP-7	5.5	3/20/1996			3,800	4,300
GP-8	7	3/20/1996			77	160
GP-8	8	3/20/1996			6.55	
GP-9	8	3/20/1996			12,000	2,900
GP-10	7 to 7	3/20/1996			383	
GP-11	6.5	3/20/1996			92	60
GP-12	11	3/20/1996			382	
GP-12	12.5	3/20/1996			414	
GP-13	7	3/20/1996			2 U	
GP-13	10	3/20/1996			15	41
JP-1	4 to 8	6/21/2001			73.8	100
JP-2	0 to 3	6/21/2001			134	341
JP-2	3 to 6	6/21/2001			379	942
JP-3	4 to 6	6/21/2001			10 U	25 U
JP-4	3 to 6	6/21/2001			180	58.2
JP-5	3 to 6	6/21/2001			210	375
JP-6	6 to 9	6/21/2001			26.6	69.3
JP-7	1 to 2	6/21/2001			264	923
MW-6	2.5	3/9/1988	180	80		
MW-7	2.5	3/9/1988	605	605		
MW-8	2.5	3/9/1988	1,680	1,580		
MW-9	2.5	3/9/1988	33,500	33,500		
MW-10	2.5	3/9/1988	1,380	1,260		
MW-11	2.5	3/9/1988	10,100	9,480		
MW-12	2.5	3/9/1988	5 U	5 U		
MW-15	2.5	3/9/1988	3,430	3,030		
MW-16	2.5	3/9/1988	5 U	5 U		
MW-17	2.5	3/9/1988	174	124		
MW-18	2.5	3/9/1988	777	777		
MW-19	2 to 3.5	3/11/1991		53		

Table 2 Analytical Results for Total Petroleum Hydrocarbons in Soil

	Depth		Oil and Grease	TPH	TPH-Diesel	TPH-Oil
Sample ID	(feet)	Date Sampled	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
-	• •	Unrestricted/Residential	2,000	2,000	2,000	2,000
MW-19	2 to 3.5	3/11/1991	,	10 U ¹	,	ŕ
MW-19	3.5 to 5	3/11/1991		14		
MW-19	3.5 to 5	3/11/1991		10 U ¹		
MW-20	2 to 3.5	3/11/1991		18		
				10 U ¹		
MW-20	2 to 3.5 3.5 to 5	3/11/1991		20		
MW-20	+	3/11/1991		10 U ¹	-	
MW-20	3.5 to 5	3/11/1991				
MW-21	1.5 to 3	3/11/1991		110		
MW-21	1.5 to 3	3/11/1991		10 U 1		
MW-21	3.5 to 5	3/11/1991		12,000		
MW-21	3.5 to 5	3/11/1991		4,700 ¹		
MW-22	2.5 to 4	3/11/1991		41,000		
MW-22	2.5 to 4	3/11/1991		7,300 ¹		
MW-22	4 to 5.5	3/11/1991		24,000		
MW-22	4 to 5.5	3/11/1991		430 ¹		
MW-23	1 to 2.5	3/11/1991		300		
MW-23	1 to 2.5	3/11/1991		10 U ¹		
MW-24	2.5 to 4	3/11/1991		260		
MW-24	2.5 to 4	3/11/1991		10 U ¹		
MW-24	4 to 5.5	3/11/1991		1,300		
MW-24	4 to 5.5	3/11/1991		10 U ¹		
MW-27	2	6/24/1991		4,700		
MW-27	2	6/24/1991		900		
MW-27	3	6/24/1991		61		
MW-27	3	6/24/1991		10 U ¹		
MW-28	2	6/24/1991		93		
MW-28	2	6/24/1991		10 U ¹		
MW-28	3	6/24/1991		51		
MW-28	3	6/24/1991		10 U ¹		
MW-29	1	6/24/1991		590		
MW-29	1	6/24/1991		220 ¹		
MW-29	2	6/24/1991		730,000		
MW-29	2	6/24/1991		160,000		
MW-30	2	6/24/1991		4,900		
MW-30	2	6/24/1991		820		
MW-30	3	6/24/1991		7,700		
MW-30	3	6/24/1991		3,000		
MW-31	12.5 to 14				49	
MW-31	2.5 to 4	12/6/1993			13	
MW-32	12.5 to 14					
MW-32	7.5 to 9	12/6/1993			10 U	
MW-33	12.5 to 14				11	
MW-33	5 to 6.5	12/6/1993			1,100	
MW-35	12.5 to 14	12/6/1993			16	
MW-35	2.5 to 4	12/6/1993			10 U	
MW-36	12.5 to 14	12/6/1993			22	

Table 2 Analytical Results for Total Petroleum Hydrocarbons in Soil

	Depth		Oil and Grease	TPH	TPH-Diesel	TPH-Oil
Sample ID	(feet)	Date Sampled	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
MTCA Method A Clea	nup Level	Unrestricted/Residential	2,000	2,000	2,000	2,000
MW-36	2.5 to 4	12/6/1993			700	
MW-37	2.5 to 4	12/6/1993			3,500	
MW-37	12.5 to 14	12/6/1993			380	
MW-A1	7.5 to 8	2/4/2008			74.1	79.5
MW-A1	8.5 to 9	2/4/2008			5,160	471 U
MW-A2	6 to 6.5	2/4/2008			33.3	290
MW-A2	7.5 to 8	2/4/2008			2,370	279
RW-1/MW-14	2.5	3/9/1988	1,730	1,730		
TP-2	3.5	12/6/1993			10 U	
TP-2	3.5	12/8/1993				
TP-3	3.5	12/6/1993			16	
TP-3	3.5	12/8/1993				
TP-5	3.5	12/6/1993			10 U	
TP-5	3.5	12/8/1993				
UG-1	5 to 7	9/25/2000			27,100	52,300
UG-2	10 to 12	9/25/2000			364	353
UG-3	7.5 to 9.5	9/25/2000			190	79.5
UG-4	5 to 7	9/25/2000			10 U	25 U
UG-5	5 to 7	9/25/2000			10 U	25 U
UG-6	5 to 7	9/26/2000			10 U	25 U
UG-7	2.5 to 4.5	9/26/2000			402	1,860
UG-8	5 to 7	9/26/2000			5,180	730
UG-9	2.5 to 4.5	9/26/2000			8,560	327
UG-9	10 to 12	9/26/2000			2,170	320
UG-10	5 to 7	9/26/2000			10 U	25 U
UG-11	5 to 7	9/26/2000			153	176
UG-12	5 to 7	9/26/2000			10 U	25 U
W-1	3	2/23/1990		13,000		
W-2	3	2/23/1990		17,000		
W-3	3	2/23/1990		28		
W-4	3	2/23/1990		4,600		
W-5	3	2/23/1990		2,300		
W-6	3	2/23/1990		1,200		
W-7	3	2/23/1990		910		

1. Duplicate result analyzed using EPA Method 8015 Modified. The primary results were analyzed using EPA Method 418.1.

mg/kg = milligrams per kilogram

MTCA = Model Toxics Control Act

TPH = Total Petroleum Hydrocarbon

U = Analyte not detected above the reporting limit indicated

-- = Not analyzed

Bold and cell in orange = Result greater than MTCA A CUL criteria

Table 3 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Soil

							Total	
			TPH-Gas	Benzene	Ethylbenzene	Toluene	Xylene	Lood
Sample ID	Depth	Date Sampled	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	Lead mg/kg
Sample ID	•	•	ilig/kg	ilig/kg	ilig/kg	ilig/kg	ilig/kg	ilig/kg
		MTCA Method A						
	Industria	al Cleanup Level						1,000
MTC		Cleanup Level,	4					
	Unrestri	cted/Residential	100/30 ¹	0.03	6	7	9	250
AD-1	3	1/15/1990		0.4 U	0.8 U	8 U	2 U	22
AD-5	2.5 to 3	1/15/1990		0.4 U	0.8 U	8 U	2 U	76
AD-8	2.5 to 3	1/15/1990		0.4 U	0.8 U	8 U	2 U	10
AD-8	4.5 to 5	1/15/1990		0.4 U	0.8 U	8 U	2 U	2.8
AD-12	2.5 to 3	1/15/1990		0.4 U	1.5	8 U	2 U	
AD-12	3 to 3.5	1/15/1990		0.4 U	2.5	8 U	2 U	44
AD-13	2 to 2.5	1/15/1990		0.4 U	10	8 U	2 U	180
AD-14	2 to 2.5	1/15/1990		5.1	15	8 U	2 U	58
AD-15	0.5 to 1	1/15/1990		0.4 U	0.8 U	8 U	2 U	97
AD-15	2.5 to 3	1/15/1990		0.4 U	0.25	8 U	0.61	14
AD-16	0.5 to 1	1/15/1990		0.4 U	0.8 U	8 U	2 U	7.9
AD-17	0.5 to 1	1/15/1990		0.4 U	0.8 U	8 U	2 U	69
B-21-91	5	6/24/1991		0.035	2	0.53	8.8	30
B-21-91	6	6/24/1991		0.05 U	0.05 U	0.05 U	0.05 U	3.7
B-34/S-2	4 to 5.5	12/6/1993	670	0.63	2.6	0.05 U	0.9	15 U
B-34/S-5	12.5 to 14	12/6/1993	2,600	6.6	14	0.05 U	3.8	860
DM-6		12/6/1999	10.5					
DM-7		12/8/1999	20.1					
DM-8		12/1/1999	5 U					
GP-7	5.5	3/20/1996	150	0.05 U	0.05 U	0.05 U	0.1 U	
GP-8	7	3/20/1996	3.9	0.05 U	0.05 U	0.05 U	0.1 U	
GP-9	8	3/20/1996	880	0.05 U	0.05 U	0.18	0.6	
GP-11	6.5	3/20/1996	160	0.05 U	0.05 U	0.05 U	0.1 U	
GP-13	10	3/20/1996	1 U	0.05 U	0.05 U	0.05 U 0.05 U	0.1 U	
JP-1 JP-2	4 to 8	6/21/2001	5 U 5 U	0.05 U	0.05 U		0.1 U 0.1 U	
	0 to 3	6/21/2001		0.05 U	0.05 U	0.05 U		
JP-2 JP-3	3 to 6	6/21/2001	5 U 5 U	0.05 U	0.05 U 0.05 U	0.05 U	0.1 U 0.1 U	
JP-3 JP-4	4 to 6	6/21/2001 6/21/2001	6.04	0.05 U 0.05 U	0.05 U	0.05 U 0.05 U	0.1 U	
JP-4 JP-5	3 to 6 3 to 6	6/21/2001	5 U	0.05 U	0.05 U	0.05 U	0.1 U	
JP-5 JP-6	6 to 9	6/21/2001	5 U	0.05 U	0.05 U	0.05 U	0.1 U	
JP-7	1 to 2	6/21/2001	26.5	0.05 U	0.05 U	0.05 U	0.1 U	
MW-6	2.5	3/9/1988	20.3	0.03 U	1.001	0.03 U	2.95	
MW-7	2.5	3/9/1988		0.015 U	0.087 U	0.01 U	0.064 U	
MW-8	2.5	3/9/1988		0.015 U	0.01 U	0.01 U	0.004 U	
MW-9	2.5	3/9/1988		0.015 U	0.432	0.01 U	1.207	
MW-10	2.5	3/9/1988		0.015 U	0.432	0.01	1.399	
MW-11	2.5	3/9/1988		0.362	1.994	1.31	10.39	
MW-12	2.5	3/9/1988		0.015 U	0.01 U	0.01 U	0.015 U	
MW-15	2.5	3/9/1988		0.158 U	0.781	0.66	11.018	
MW-16	2.5	3/9/1988		0.015 U	0.701 0.01 U	0.00 U	0.015 U	
MW-17	2.5	3/9/1988		0.015 U	0.01 U	0.01 U	0.015 U	
MW-18	2.5	3/9/1988		0.048	2.685	0.028	10.215	

Analytical Results for TPH as Gasoline, Benzene, Toluene, Table 3 Ethylbenzene, Total Xylenes, and Lead in Soil

					<u> </u>		Total	
			TPH-Gas	Benzene	Ethylbenzene	Toluene	Xylene	Lead
Sample ID	Depth	Date Sampled	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Sample 1D	•	•	ilig/kg	ilig/kg	ilig/kg	ilig/kg	ilig/kg	ilig/kg
		MTCA Method A						4 000
		l Cleanup Level						1,000
MTC		Cleanup Level,	4					
	Unrestri	cted/Residential	100/30 ¹	0.03	6	7	9	250
MW-19	2 to 3.5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-19	3.5 to 5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-20	2 to 3.5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-20	3.5 to 5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-21	1.5 to 3	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-21	3.5 to 5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-22	2.5 to 4	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-22	4 to 5.5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-23	1 to 2.5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-24	2.5 to 4	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-24	4 to 5.5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-27	2 to 2	6/24/1991		0.05 U	0.57	0.05 U	0.64	310
MW-27	3 to 3	6/24/1991		0.05 U	0.05 U	0.05 U	0.05 U	10
MW-28	2 to 2	6/24/1991		0.05 U	0.05 U	0.05 U	0.05 U	15
MW-28	3 to 3	6/24/1991		0.05 U	0.66	0.05 U	1.9	11
MW-29	1 to 1	6/24/1991		0.05 U	0.84	0.55	3.5	29
MW-29	2 to 2	6/24/1991		0.18	2.9	5.3	7.9	89
MW-30	2 to 2	6/24/1991		0.05 U	0.74	0.77	2.6	37
MW-30	3 to 3	6/24/1991		0.5	0.24	0.13	1	570
MW-31	12.5 to 14	12/6/1993	31	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-31	2.5 to 4	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	44
MW-32	12.5 to 14	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	200
MW-32	7.5 to 9	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-33	12.5 to 14	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-33	5 to 6.5	12/6/1993	49	0.05 U	0.05 U	0.05 U	0.1 U	54
MW-35	12.5 to 14	12/6/1993	1.3	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-35	2.5 to 4	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-36	12.5 to 14	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-36	2.5 to 4	12/6/1993	30	0.05 U	0.05 U	0.05 U	0.1 U	26
MW-37	12.5 to 14	12/6/1993	170	0.18	0.19	0.05 U	0.26	15 U
MW-37	2.5 to 4	12/6/1993	180	0.77	1.4	0.05 U	2.3	55
MW-A1	7.5 to 8	2/4/2008	50 U	0.0322 U	0.0322 U	0.0376	0.0965 U	
MW-A1	8.5 to 9	2/4/2008	168	0.0319 U	0.0319 U	0.0319 U	0.0956 U	
MW-A2	6 to 6.5	2/4/2008	10.2 U	0.102 U	0.102 U	0.102 U	0.306 U	
MW-A2	7.5 to 8	2/4/2008	203	0.0355	0.04	0.0313 U	0.6	
RW-1/MW-14	2.5	3/9/1988		0.575	2.348	1.301	12.975	
TP-2	3.5	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	10 U
TP-3	3.5	12/6/1993	3.4	0.05 U	0.05 U	0.05 U	0.1 U	10 U
TP-5	3.5	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	10 U
UG-1	5 to 7	9/25/2000	173					
UG-2	10 to 12	9/25/2000	55.3					
UG-3	7.5 to 9.5	9/25/2000	108					
UG-4	5 to 7	9/25/2000	5 U					

Table 3 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Soil

Sample ID	Depth	Date Sampled	TPH-Gas mg/kg	Benzene mg/kg	Ethylbenzene mg/kg	Toluene mg/kg	Total Xylene mg/kg	Lead mg/kg
		MTCA Method A al Cleanup Level						1,000
MTC		A Cleanup Level, cted/Residential	100/30 ¹	0.03	6	7	9	250
UG-5	5 to 7	9/25/2000	5 U					
UG-6	5 to 7	9/26/2000	5 U					
UG-7	2.5 to 4.5	9/26/2000	5 U					
UG-8	5 to 7	9/26/2000	3410					
UG-9	2.5 to 4.5	9/26/2000	6050	2.5 U	34 U	5.5 U	30.5 U	
UG-9	10 to 12	9/26/2000	630					
UG-10	5 to 7	9/26/2000	5 U					
UG-11	5 to 7	9/26/2000	5 U					
UG-12	5 to 7	9/26/2000	5 U					

1. Cleanup level for TPH-Gas is 100 mg/kg when benzene is absent, and 30 mg/kg in presence of benzene.

mg/kg = milligrams per kilogram

MTCA = Model Toxics Control Act

U = Analyte not detected above the reporting limit indicated

-- = Not analyzed

Bold TPH-Gas = Result greater than 30 mg/kg but presence of benzene is unknown due to high detection limit

Bold and cell in orange = Result greater than MTCA Method A Unrestricted Land Use

cell in yellow = analyte not detected, but detection limit is greater than MTCA Unrestricted Land Use

Bold and cell in green = Result greater than MTCA Unrestricted Land Use but less than MTCA Method A Industrial Cleanup Level

Table 4 Analytical Results for Polycyclic Aromatic Hydrocarbons in Soil

Sample ID	Depth MTCA A	Date Sampled ndustrial CUL	Acenaphthene (mg/kg)	Acenaphthylene (mg/kg)	Anthracene (mg/kg)	Benzo(a) anthracene* (mg/kg)	Benzo(a) pyrene* (mg/kg)	Benzo(b) fluoranthene* (mg/kg)	Benzo(g,h,i) perylene (mg/kg)	Benzo(k) fluoranthene* (mg/kg)	Chrysene* (mg/kg)	Dibenz(a,h) anthracene* (mg/kg)	Indeno(1,2,3-cd) pyrene* (mg/kg)	Naphthalene (mg/kg)	Phenanthrene (mg/kg)	Pyrene (mg/kg)	Total cPAH ¹ TEQ- Adjusted (mg/kg)
MTCA A L	nrestricted/Re						0.1										0.1
WITOTTT		rcinogen CUL					0.14										0.1
МТ	CA B Non-Ca		4,800		24,000		0.11							1,600		2.400	
B-34/S-2	4 to 5.5	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	1.1	0.24	0.1 U	0.0755 U
B-34/S-5	12.5 to 14	12/6/1993	2 U	2 U	4.9	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	4.9	2 U	1.51 U
GP-7	5.5	3/20/1996	0.15 U	0.993	0.261	4.25	0.024	0.468	0.744	0.132	3.43	0.01 U	1.43	0.15 U	0.844	1.3	0.6868
GP-8	7	3/20/1996	0.32	0.168	0.147	0.717	0.166	0.141	0.0728	0.0435	25.2	0.01 U	0.0967	0.15 U	0.669	0.02 U	0.51832
GP-9	8	3/20/1996	1.27	2.98	0.15 U	0.01 U	0.105	0.173	0.412	0.111	12.4	0.409	0.0858	0.15 U	1.3	1.35	0.30738
GP-11	6.5	3/20/1996	0.15 U	0.15 U	0.15 U	0.0859	0.0106	0.053	0.165	0.01 U	0.192	0.0644	0.0483	0.15 U	0.276	0.202	0.03818
GP-13	10	3/20/1996	0.15 U	0.15 U	0.15 U	0.0479	0.0361	0.0173	0.01 U	0.0365	0.0597	0.0312	0.0157	0.15 U	0.15 U	0.0482	0.051557
MW-31	2.5 to 4	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.12	0.14	0.0755 U
MW-31	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-32	7.5 to 9	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-32	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1	0.34	0.26	0.33	0.18	0.16	0.16	0.1 U	0.17	0.1 U	0.68	0.98	0.3666
MW-33	5 to 6.5	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-33	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-35	2.5 to 4	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-35	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-36	2.5 to 4	12/6/1993	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	0.31	0.31	1.51 U
MW-36	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-37	2.5 to 4	12/6/1993	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.3775 U
MW-37	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
TP-2	3.5	12/8/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
TP-3	3.5	12/8/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
TP-5	3.5	12/8/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U

1. Total cPAH concentration expressed as TEQ-adjusted total cPAH concentration adjusted using Toxicity Equivalency Factors for maximum required cPAHs (Table 708-2 under WAC 173-340-708). cPAH = Carcinogenic Polycyclic Aromatic Hydrocarbon

CUL = cleanup level

mg/kg = milligrams per kilogram MTCA = Model Toxics Control Act

TEQ = toxicity-equivalent quotient

U = Sample was analyzed but not detected above the reporting limit indicated

-- = Not analyzed

Bold and cell in blue = Benzo(a)pyrene result greater than MTCA Nethod A CUL Residential and MTCA Method B CUL Carcinogen but less than MTCA Method A CUL Industrial

Bold and cell in yellow = Analyte not detected, but detection limit is greater than MTCA Method A CUL Unrestricted and/or Industrial land use

Bold and cell in orange = Result for TEQ-adjusted total cPAHs greater than MTCA Method A residential/unrestricted CUL.

^{* =} Compounds is a cPAH compound included in calculations of TEQ-adjusted total cPAH concentration. Values for individual cPAH constituents are actual analytical results.

Table 5 Analytical Results for Total Petroleum Hydrocarbons in Groundwater

	T	Τ			
		0.1 - 1 0	TPH	TDU D'	TDU O'
Wall ID	Dete Commissi	Oil and Grease	(undifferentiated)	TPH-Diesel	TPH-Oil
Well ID	Date Sampled MTCA Method A	(µg/L)	(µg/L)	(µg/L)	(µg/L)
		500	500	500	500
	3/27/1991		3,800		
D.O II	6/24/1991		500 U		
B-2_well	12/26/1991			500 U	
	12/9/1993			780	
D.C. well	11/21/1995		4.000 11	4,400	3,900
B-5_well	3/27/1991		1,000 U 86.2		
	3/17/1988	86,200			
	3/27/1991		27,000		
	6/24/1991		500 U		
MW-10	9/26/1991			2,600	
10100-10	12/26/1991			9,000	
	12/9/1993 11/22/1995			10,000	
				4,200	6,800
	12/8/2000			19,000	18,000 J
	2/28/2002	49 400	 41.4	5,700	2,300 J
	3/17/1988	48,400			
	3/27/1991 6/24/1991		15,000 7,200		
	9/26/1991		7,200	3,900	
	12/9/1993			10,000	
	11/22/1995			2,400	1,200
	12/8/2000			230 J	400 U
	3/19/2001			540	310 J
	5/16/2001			760	590
	8/21/2001			670	820
	2/28/2002			460	520
	8/27/2002			3,700	1,300 J
	11/26/2002			480	520
	2/6/2003			460	460 J
	5/15/2003			470	440 J
MW-11	8/20/2003			610	610
	11/14/2003			360	330 J
	2/26/2004			430	410 J
	5/27/2004			270 J	310 J
	11/18/2004			500 J	480 U
	2/24/2005			240	430 J
	5/23/2005			470	380 J
	8/30/2005			79 U	98 U
	11/29/2005			160 J	200 J
	2/23/2006			77 U	96 U
	8/24/2006			93.9 U	93.9 U
	11/27/2006			108	94.3 U
	2/12/2007			93.9 U	141
	8/29/2007			94.3 U	109
	2/11/2008			19,200	1,280
	2/12/2009			94.3 U	94.3 U

Table 5 **Analytical Results for Total Petroleum Hydrocarbons in Groundwater**

Well ID	Date Sampled	Oil and Grease (μg/L)	TPH (undifferentiated) (µg/L)	TPH-Diesel (µg/L)	TPH-Oil (μg/L)
	MTCA Method A	500	500	500	500
	3/17/1988	10,500	4		
	3/27/1991		5,200		
	6/24/1991		500 U		
MW-12	9/26/1991			4,100	
	12/26/1991			500 U	
	12/9/1993			550	
	11/22/1995			2,100	3,600
	3/17/1988	25,000	16.9		
	3/27/1991		8,200		
MW-13	6/24/1991		4,300		
10100-13	9/26/1991			400 U	
	12/9/1993			2,600	
	11/22/1995			6,700	3,100
	3/17/1988	9,500	9.5		
	3/27/1991		4,000		
	6/24/1991		4,000		
MW-15	9/26/1991			860	
	12/26/1991			790	
	12/9/1993			600	
	11/21/1995			1,700	1,700
	3/17/1988	2,700	2.7		
	3/27/1991		1,000 U		
	6/24/1991		500 U		
MW-16	9/26/1991			400 U	
	12/26/1991			910	
	12/9/1993			610	
	11/21/1995			770	1,200
	3/17/1988	3,800	3.8		
	3/27/1991		1,000 U		
N 0 A / 4 =	6/24/1991		500 U		
MW-17	9/26/1991			460	
	12/26/1991			1,000	
	12/9/1993			320	
	11/21/1995	24.000	 18	490	970
	3/17/1988	31,000			
	3/27/1991 6/24/1991		43,000 15,000		
	9/26/1991			5,300	
MW-18	12/26/1991			11,000	
	12/9/1991			46,000	
	11/21/1995	-		16,000	4,400
	2/28/2002			2,500	950 U
	3/27/1991		1,000 U	2,500 	950 0
	6/24/1991		500 U		
	9/26/1991		500 U 	400 U	
MW-19	12/26/1991			1,800	
	12/7/2000			830 J	1,000 U
	3/19/2001			1,600	800

Table 5 Analytical Results for Total Petroleum Hydrocarbons in Groundwater

			TPH		I
		Oil and Grease	(undifferentiated)	TPH-Diesel	TPH-Oil
Well ID	Date Sampled	(µg/L)	(µg/L)	(µg/L)	(µg/L)
Well ID	MTCA Method A	500	500	500	500
	5/16/2001			760	590
	8/21/2001			1,100	1,200
	2/28/2002			1,200	580
	8/27/2002			680	410 J
	11/26/2002			860	570
	2/6/2003			1,900	1,100 J
	5/15/2003			3,300	2,000
	8/20/2003			1,400 J	1,400 J
	11/14/2003			1,400	750
	2/26/2004			1,800 J	4,700 J
	5/27/2004			680	460 J
	8/30/2004			850	460 J
MW-19	11/18/2004			640	190 U
(continued)	2/24/2005			860	500
(continuou)	5/23/2005			1,000	550 J
	8/30/2005			1,200	470 J
	11/29/2005			200 J	180 J
	2/12/2006			1,570	705
	2/23/2006			200 J	100 U
	8/24/2006			1,740	825
	11/27/2006			209	118
	8/29/2007			1,390	547
	2/11/2008			794	587
	8/28/2008			1,050	1,200
	2/12/2009			993	303
	3/27/1991		1,000 U		
	6/24/1991		500 U		
	9/26/1991			400 U	
	12/26/1991			520	
MW-20	12/7/2000			410 J	400 U
	3/19/2001			610	480 J
	5/17/2001			540	390 J
	2/28/2002			540	410 J
	3/27/1991		1,058,000		
MW-21	6/24/1991		63,000		
	2/28/2002			9,800	5,800
1.04/ 00	3/27/1991		800,000		
MW-22	12/26/1991			26,000	
1.01/ 00	3/27/1991		25,000		
MW-23	6/24/1991		500 U		
MW-24	3/27/1991		6,000		
	6/24/1991		16,000		
MW-27	9/26/1991			9,400	
	11/21/1995			4,700	4,400
	1 1/2 1/ 1000			.,. 00	., 100

Table 5 Analytical Results for Total Petroleum Hydrocarbons in Groundwater

		Oil and Grease	TPH (undifferentiated)	TPH-Diesel	TPH-Oil
Well ID	Date Sampled	(µg/L)	(μg/L)	(µg/L)	(µg/L)
	MTCA Method A	500	500	500	500
	6/24/1991		600		
	9/26/1991			400 U	
MW-28	12/26/1991			500 U	
	12/9/1993			2,600	
	11/21/1995			3,400	3,700
	6/24/1991		7,200		
MW-30	9/26/1991			1,300	
10100-30	12/26/1991			3,500	
	12/9/1993			2,200	
MW-31	12/9/1993			470	
10100-31	11/21/1995			470	750 U
MW-32	12/9/1993			490	
10100 32	11/21/1995			400	750 U
MW-33	12/9/1993			5,500	
10100 55	11/21/1995			790	750 U
	12/9/1993			900	
MW-35	11/22/1995			330	1,100
10100-33	12/8/2000			160 J	400 U
	3/19/2001			190 J	200
MW-36	12/9/1993			790	
10100-30	11/21/1995			710	750 U
MW-37	12/9/1993			13,000	
10100 37	11/21/1995			1,600	2,400
	12/8/2000			11,000	6,400 J
	3/19/2001			20,000	14,000
	5/16/2001			18,000	14,000
	8/21/2001 2/28/2002			15,000	8,100
	8/27/2002			13,000 6,600	6,500 2,700
	11/26/2002			5,900	3,600 J
	2/6/2003			9,100	5,300
	5/15/2003			14,000	7,200
	8/20/2003			16,000	6,300 J
	11/14/2003			5,300	2,300 J
	2/26/2004			13,000	4,600 J
MW-40R	5/27/2004			11,000	4,800 J
10100-401	8/30/2004			15,000	5,000
	2/24/2005			4,200	1,900
	5/23/2005			15,000	4,200 J
	8/30/2005			23,000	6,600
	11/29/2005			2,100	790 J
	2/23/2006			2,000	540 U
	8/24/2006 11/27/2006			6,550	2,090 968
	2/12/2006			3,750 3,970	1,060
	8/29/2007			5,970 5,150	520
	2/11/2008			2,840	1,080
	8/28/2008			10,600	8,990
	2/12/2009			3,110	959

Table 5 **Analytical Results for Total Petroleum Hydrocarbons in Groundwater**

			ТРН		
Well ID	Date Sampled	Oil and Grease (µg/L)	(undifferentiated) (µg/L)	TPH-Diesel (µg/L)	TPH-Oil (µg/L)
	MTCA Method A	500	500	500	500
	3/17/1988	12,400	1.1		
	3/27/1991		1,000 U		
	6/24/1991		500 U		
MW-6	9/26/1991			400 U	
	12/26/1991			5,500	
	12/9/1993			670	
	11/21/1995			800	1,400
MW-7	3/17/1988	4,700	1.6		
	3/17/1988	132,000	11.5		
MANA/ O	6/24/1991		1,300		
MW-8	12/9/1993			26,000	
	11/21/1995			3,300	3,100
	3/17/1988	7,600	1.5		
	3/27/1991		1,000 U		
	6/24/1991		500 U		
MW-9	9/26/1991			770	
	12/26/1991			4,800	
	12/9/1993			2,600	
	11/21/1995			3,300	3,300
	2/11/2008			2,060	488
MW-A1	8/28/2008			2,850	2,600
	2/12/2009			2,080	414
	2/11/2008			1,310	550
MW-A2	8/28/2008			1,790	1100
	2/12/2009			1840	339
	8/22/1989		19,000		
	3/27/1991		1,000 U		
RW-1/MW-14	6/24/1991		530		
	9/26/1991			5,100	
	12/26/1991			500 U	
RW-2	2/11/2002			2,500	950 U
UG-2	9/25/2000			95	49
UG-8	9/25/2000			66,500	7,360
VWPT-1	6/6/1995			2,600	1,300
W-15R	2/28/2002			300,000	20,000 U
	12/7/2000			53,000	26,000
W-17	3/19/2001			12,000	6,400
VV 17	5/16/2001			43,000	19,000 J
	8/21/2001			31,000	9,800
W-2	3/2/1990		7,400		
	3/2/1990		530 U		
	12/7/2000			990	350 J
	3/19/2001			900	370 J
W-3	5/17/2001			1,500	440 J
V V 🔾	8/21/2001			700	360 J
	3/1/2002			810	750
	8/27/2002			1,100	540 J
	11/26/2002			850	260 J

Table 5 Analytical Results for Total Petroleum Hydrocarbons in Groundwater

			TPH		
		Oil and Grease		TDU Diseas	TDU OIL
Well ID	Data Sampled	(μg/L)	(undifferentiated) (µg/L)	TPH-Diesel (μg/L)	TPH-Oil (µg/L)
Well ID	Date Sampled MTCA Method A	(μ g/L) 500	(µg/L) 500	(μ g/L) 500	(µg/L) 500
	2/6/2003			2,600	1,200
	5/15/2003			1,000	350 J
	8/20/2003			1,000	290 J
	11/14/2003			820	260 J
	2/26/2004			880	260 J
	5/27/2004			1,600	380 J
	8/30/2004			950	230 J
	11/18/2004			1,800 J	960 U
\\\ O	2/24/2005			1,400	250 J
W-3	5/23/2005			2,000	480 J
(continued)	8/30/2005			470	98 U
	11/29/2005			850	390 J
	2/23/2006			480	110 U
	8/24/2006			683	481
	11/27/2006			1,310	153
	2/12/2007			863	169
	8/29/2007			1,360	95.2 U
	2/11/2008			1,720	508
	8/28/2008			2,100	1,840
	2/12/2009			1,400	364
W-4	3/2/1990		23,200		
W-5	3/2/1990		3,800		
	12/7/2000			32,000	15,000 J
	3/19/2001			25,000	10,000
	5/16/2001			49,000	23,000 J
	8/21/2001			20	6,400 J
	2/28/2002			680	740
	8/27/2002			160,000	71,000
	11/26/2002			3,600	3,300 J
	2/6/2003			8,800	6,300
	5/15/2003			18,000	11,000
	8/20/2003			59,000	29,000
	11/14/2003			6,100	3,700 J
	2/26/2004			20,000	15,000
W-6	5/27/2004			19,000	16,000
	8/30/2004			10,000	6,400
	11/18/2004			900 J	530 J
	2/24/2005			13,000	11,000
	5/23/2005			8,800	5,000 J
	8/30/2005			170,000	120,000
	11/29/2005			1,500	2,600
	2/23/2006			270	610
	8/24/2006			3,300	1,580
	11/27/2006			1,030	429
	2/12/2007			1,660	532
	8/29/2007			2,080	756
	2/21/2008			1,590	890

Table 5 Analytical Results for Total Petroleum Hydrocarbons in Groundwater

Well ID	Date Sampled	Oil and Grease (µg/L)	TPH (undifferentiated) (µg/L)	TPH-Diesel (μg/L)	TPH-Oil (µg/L)
	MTCA Method A	500	500	500	500
W-6	8/26/2008			27,900	23,800
(continued)	2/12/2009			444	323

 $J = The result is an approximation <math>\mu g/L = microgram per liter$

MTCA = Model Toxics Control Act

TPH = Total Petroleum Hydrocarbon

U = Analyte not detected above the reporting limit indicated

-- = Not analyzed

Bold and cell in orange = Result greater than MTCA Method A cleanup level cell in yellow = analyte not detected, but reporting limit is greater than MTCA Method A cleanup level

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

MTCA Method A Cleanup Level 1,000/800 5 3/27/1991 1 U 6/24/1991 1 U 12/26/1991 50 U 0.5 U 12/9/1993 50 U 0.5 U 11/21/1995 50 U 0.78 3/27/1991 1 U 3/17/1988 27 3/27/1991 5 6/24/1991 1 U 9/26/1991 9/26/1991 1,800 19 MW-10 12/26/1991 960 11 12/9/1993 1,100 0.88 11/22/1995 1,300 1.3 12/8/2000 1,100 0.84 J 2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7 12/9/1993 880 90	700 1 U 1 U 0.5 U 0.5 U 0.5 U 1 U 12.7 4	1,000 1 U 1 U 0.5 U 1.1 0.5 U	1,000 1 U 1 U 0.5 U 1 U	15 	15
B-2_well	1 U 0.5 U 0.5 U 0.5 U 1 U 12.7 4	1 U 0.5 U 1.1 0.5 U	1 U 0.5 U		
B-2_well	0.5 U 0.5 U 0.5 U 1 U 12.7	0.5 U 1.1 0.5 U	0.5 U		
12/9/1993 50 U 0.5 U 11/21/1995 50 U 0.78 3/27/1991	0.5 U 0.5 U 1 U 12.7 4	1.1 0.5 U			
12/9/1993 50 U 0.5 U 11/21/1995 50 U 0.78 3/27/1991	0.5 U 0.5 U 1 U 12.7 4	1.1 0.5 U			
3/27/1991 1 U 3/17/1988 27 3/27/1991 5 6/24/1991 1 9/26/1991 1,800 19 9/26/1991 960 11 12/9/1993 1,100 0.88 11/22/1995 1,300 1.3 12/8/2000 1,100 0.84 J 2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7	1 U 12.7 4		1 0	2.8	20
3/17/1988 27 3/27/1991 5 6/24/1991 1 9/26/1991 1,800 19 MW-10 12/26/1991 960 11 12/9/1993 1,100 0.88 11/22/1995 1,300 1.3 12/8/2000 1,100 0.84 J 2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7	12.7 4	4 1 1	1 U		
3/17/1988 27 3/27/1991 5 6/24/1991 1 9/26/1991 1,800 19 MW-10 12/26/1991 960 11 12/9/1993 1,100 0.88 11/22/1995 1,300 1.3 12/8/2000 1,100 0.84 J 2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7	4	1 U	1 U		
6/24/1991 1 9/26/1991 1,800 19 12/26/1991 960 11 12/9/1993 1,100 0.88 11/22/1995 1,300 1.3 12/8/2000 1,100 0.84 J 2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7		30	192		
MW-10	4 1 1	7	6		
MW-10 12/26/1991 960 11 12/9/1993 1,100 0.88 11/22/1995 1,300 1.3 12/8/2000 1,100 0.84 J 2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 6/24/1991 9/26/1991 440 3.7	1 U	1 U	1 U		
MW-10 12/26/1991 960 11 12/9/1993 1,100 0.88 11/22/1995 1,300 1.3 12/8/2000 1,100 0.84 J 2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 6/24/1991 9/26/1991 440 3.7	0.5 U	0.5 U	7.2		
12/9/1993 1,100 0.88 11/22/1995 1,300 1.3 12/8/2000 1,100 0.84 J 2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7	0.5 U	0.55	2.5		
11/22/1995 1,300 1.3 12/8/2000 1,100 0.84 J 2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7	0.5 U	1.6	3.8	2.3	65
12/8/2000 1,100 0.84 J 2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7	0.5 U	0.5 U	2		
2/28/2002 1,100 0.86 J 3/17/1988 149 3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7	4	1.1	4.1		
3/17/1988 149 3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7	1 U	0.73 J	5		
3/27/1991 205 6/24/1991 36 9/26/1991 440 3.7	18.5	12	160		
6/24/1991 36 9/26/1991 440 3.7	68	25	86		
9/26/1991 440 3.7	15	13	20		
	0.5 U	0.5 U	1.1	 	
• (2) (3) (3) (30) (30)	9.9	0.5 U	25	5.5	110
11/22/1995 790 36	1.8	0.8	1.6		
12/8/2000 48 U 2.8	0.2 U	0.22 J	0.6 U	 	
3/19/2001 48 U 0.46 J	0.2 U	0.2 U	0.6 U	 	
5/16/2001 48 U 0.2 U	0.2 U	0.2 U	0.6 U	 	
8/21/2001 48 U 0.2 U	0.2 U	0.2 U	0.6 U		
2/28/2002 48 U 0.2 U	0.2 U	0.2 U	0.6 U	 	
8/27/2002 48 U 1.3	0.2 U	0.2 U	0.6 U	 	
11/26/2002 48 U 0.94 J	0.2 U	0.2 U	0.6 U		
2/6/2003 48 U 0.92 J	0.2 U	0.2 U	0.6 U		
5/15/2003 70 J 4.4	1.5	8.7	9.3		
MW-11 8/20/2003 48 U 0.2 U	0.2 U	0.3 J	0.6 U		
11/14/2003 48 U 0.5 J	0.6 J	0.9 J	3.2		
2/26/2004 48 U 0.2 U	0.5 J	0.9 U	1.7 J		
5/27/2004 48 U 0.2 U	0.3 J	0.2 J	1.7 J		
11/18/2004 48 U 0.9 J	0.6 J	0.8 J	2.4 J		
2/24/2005 48 U 0.2 U	0.5 J	0.4 J	2.4 J		
5/23/2005 140 J 1	3.5	9.5	19		
8/30/2005 48 U 0.2 U	0.2 U	0.2 U	0.6 U		
11/29/2005 48 U 0.2 U	0.2 U	0.2 U	0.6 U		
2/23/2006 51 J 0.9 J	1.8	2.8	6.8		
8/24/2006 100 U 1 U		1 U			
11/27/2006 100 U 1 U	1 I I		3.11		
2/12/2007 100 U 1 U	1 U		3 U		
8/29/2007 1 U 1 U	1 U	1 U	3 U		
2/11/2008 2,300 21.1	1 U 1 U	1 U 1 U	3 U 3 U		
2/11/2009 2,300 21.1 2/12/2009 100 U 1 U	1 U	1 U	3 U		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (μg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (µg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
	3/17/1988		218	2 U	7.2	146.5		
	3/27/1991		1 U	1 U	1 U	3		
	6/24/1991		1 U	1 U	1 U	1 U		
MW-12	9/26/1991	160	2.1	0.42	0.5 U	0.56		
	12/26/1991	65	20	0.5 U	0.43	2.9		
	12/9/1993	50 U	21	0.5 U	0.86	3.2	4.3	23
	11/22/1995	50 U	9.2	0.5 U	0.5 U	1		
	3/17/1988	-	163	42	8.9	169.8		
	3/27/1991		1 U	2	1	1		
MW-13	6/24/1991		1 U	1 U	1 U	1 U		
10100 13	9/26/1991	500 U	0.5 U	0.5 U	0.5 U	0.5 U		
	12/9/1993	50 U	2.2	0.5 U	0.5 U	1 U	5.5	30
	11/22/1995	120	5.2	0.5 U	0.5 U	1 U		
	3/17/1988		850	108	351	1,453		
	3/27/1991		5	31	9	204		
	6/24/1991		7	13	2	29		
MW-15	9/26/1991	220	0.5 U	0.5 U	0.5 U	0.5 U		
	12/26/1991	890	15	34	1.1	69		
	12/9/1993	140	1.4	1.8	0.95	1.8	3.7	19
	11/21/1995	4,800	540	26	9.8	140		
	3/17/1988		2.5 U	2 U	2 U	2 U		
	3/27/1991		1 U	1 U	1 U	1 U		
	6/24/1991		1 U	1 U	1 U	1 U		
MW-16	9/26/1991	500 U	0.5 U	0.5 U	0.5 U	0.5 U		
	12/26/1991	50 U	0.5 U	0.5 U	0.5 U	0.5 U		
	12/9/1993	50 U	0.5 U	0.5 U	0.7	1 U	2.8	21
	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
	3/17/1988		2.5 U	2 U	2 U	2 U		
	3/27/1991		44	1 U	1 U	1 U		
B 40 A / 4 = 7	6/24/1991		280	1	4	2		
MW-17	9/26/1991	2,600	1,100	0.5 U	0.5 U	0.5 U		
	12/26/1991	1,100	480	1.3	2.2	4	 C.F	
	12/9/1993	50 U	20	0.5 U	0.88	1.4	6.5	10
	11/21/1995	50 U	66	0.5 U	0.53	1 U		
	3/17/1988		800	115	194	1,941		
	3/27/1991		141	24	22	158		
	6/24/1991	 750	1 U	1 U	1 U	1 U		
MW-18	9/26/1991	750	0.69	0.5 U	0.5 U	2.4		
	12/26/1991	4,400	223	24	0.5 U	0.5 U	 6.1	220
	12/9/1993	1,700	140	8.3	0.5 U	58 3.7	6.1	230
	11/21/1995	4,000	170	5.9	2 U			
	2/28/2002	1,300	110	0.98 J	1.6	7.8		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (μg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (µg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
	3/27/1991		1 U	1 U	1 U	1 U		
	6/24/1991		1 U	1 U	1 U	1 U		-
	9/26/1991	150	0.5 U	0.5 U	0.5 U	0.5 U		
	12/26/1991	130	0.5 U	0.5 U	0.5 U	0.5 U		
	12/7/2000	700	0.2 U	2.2	0.2 U	3		
	3/19/2001	580	0.2 U	5 U	1 U	6.7		-
	5/16/2001	48 U	0.2 U	0.2 U	0.2 U	0.6 U		-
	8/21/2001	400	0.2 U	0.2 U	1.1	1.3 J		-
	2/28/2002	220 J	0.2 U	0.2 U	0.2 U	2 J		1
	8/27/2002	160 J	0.2 U	0.2 U	0.2 U	0.81 J		
	11/26/2002	210 J	0.21 J	0.2 U	0.2 U	0.92 J		
	2/6/2003	260	0.34 J	0.2 U	0.2 U	0.66 J		
	5/15/2003	300	1.8	0.9 J	5 U	6.6		
	8/20/2003	240 J	15	0.7 J	1.2	2.7 J		
	11/14/2003	220 J	0.3 J	0.3 J	0.3 J	1.4 J		
MW-19	2/26/2004	93 J	0.2 U	0.2 U	0.2 U	0.6 U		
	5/27/2004	210 J	0.2 U	0.2 U	0.2 U	0.6 U		
	8/30/2004	230 J	0.2 U	0.2 U	1 U	1.1 J		
	11/18/2004	130 J	0.2 U	0.2 U	0.2 U	0.6 U		
	2/24/2005	180 J	0.2 U	0.2 U	0.2 U	1.2 J		
	5/23/2005	4,600	63	92	340	530		
	8/30/2005	160 J	0.2 U	0.2 U	0.2 U	0.6 U		
	11/29/2005	48 U	0.2 U	0.2 U	0.2 U	0.6 U		
	2/12/2006	336	1 U	1 U	1 U	3 U		
	2/23/2006	350	0.3 J	0.2 U	0.2 U	0.6 U		
	8/24/2006	100 U	1 U	1 U	1 U	3 U		
	11/27/2006	100 U	1 U	1 U	1 U	3 U		
	8/29/2007	208	1 U	1 U	1 U	3 U		
	2/11/2008	250 U	1 U	1 U	1 U	3 U		
	8/28/2008	135	1 U	1 U	1 U	3 U		
	2/12/2009	187	1 U	1 U	1 U	3 U		
	3/27/1991		1 U	1 U	1 U	1 U		
	6/24/1991		1 U	1 U	1 U	1 U		
	9/26/1991	110	0.5 U	0.5 U	0.5 U	0.5 U		
MW-20	12/26/1991	50 U	0.5 U	0.5 U	0.5 U	0.5 U		
	12/7/2000	84 J	0.21 J	0.2 U	0.2 U	0.99 J		
	3/19/2001	69 J	0.2 U	0.2 U	0.2 U	0.6 U		
	5/17/2001	68 J	0.2 U	0.2 U	0.2 U	0.61 J		
	2/28/2002	56 J	0.2 U	0.2 U	0.2 U	0.6 U		
NAVA (0.4	3/27/1991		3	2	2	25		
MW-21	6/24/1991	210	9	110	220	560		
	2/28/2002	310	0.62 J	1.5	1	2.8 J		
MW-22	3/27/1991	4 500	1 U	1 U	2	7		
		4,500	0.5 U	0.5 U	0.5 U	0.5 U		
MW-23	3/27/1991 6/24/1991		1 U 1 U	1 U 1 U	2 1 U	8 2		
	0/24/1991		10	10	ΙU	۷		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

				Ī				
Well ID	Date Sampled	TPH- Gas (µg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (µg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
MW-24	3/27/1991		1 U	1 U	2	1		
	6/24/1991		1 U	3	7	9		
MW-27	9/26/1991	500 U	0.5 U	0.5 U	0.5 U	0.5 U		
	11/21/1995	160	0.5 U	0.5 U	0.5 U	1 U		
	6/24/1991		1 U	1	1	3		
	9/26/1991	500 U	0.5 U	0.5 U	0.5 U	0.5 U		
MW-28	12/26/1991	59	0.5 U	0.5 U	0.5 U	0.5 U		
	12/9/1993	94	0.5 U	0.5 U	0.5 U	1 U	2 U	120
	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
	6/24/1991		40	0.5 U	150	70		
NAVA (00	9/26/1991	280	1.6	0.5 U	0.5 U	0.68		
MW-30	12/26/1991	680	1.8	0.5 U	0.5 U	0.5 U		
·	12/9/1993	320	1.6	0.5 U	0.5	1.3	2 U	11
1000	12/9/1993	50 U	0.5 U	0.5 U	0.5 U	1 U	2 U	24
MW-31	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
1.01/.00	12/9/1993	50 U	0.5 U	0.5 U	0.5 U	1 U	2.2	92
MW-32	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
	12/9/1993	50 U	0.5 U	0.5 U	1.7	1 U	4.7	99
MW-33	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
	12/9/1993	50 U	2.9	0.5 U	0.5 U	1.6	2.8	77
	11/22/1995	50 U	2.7	0.5 U	0.5 U	1.7		
MW-35	12/8/2000	48 U	0.62 J	0.2 U	0.32 J	3 U		
	3/19/2001	48	0.2 U	0.2 U	0.2 U	0.6 U		
	12/9/1993	50 U	0.5 U	0.5 U	0.75	1 U	2 U	45
MW-36	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
	12/9/1993	3,900	630	26	0.5 U	12	2 U	140
MW-37	11/21/1995	50 U	0.5	0.5 U	0.5 U	1 U		
	12/8/2000	950	19	2.9	3.5	4.2		
	3/19/2001	1,400	28	1.4	3.6	8.4		
	5/16/2001	1,300	25	2.1	5.6	9		
	8/21/2001	1,600	30	3.1	2.3	5.8		
	2/28/2002	1,300	21	1.2	2.4	5.8		
	8/27/2002	1,200	23	1.6	4.4	7.1		
	11/26/2002	1,800	14	0.8 J	1.6	4.9		
	2/6/2003	1,900	21	1.1	2.3	5.1		
	5/15/2003	1,700	21	1.5	5.4	7.9		
MW-40R	8/20/2003	1,200	17	1.6	4.3	7.5		
	11/14/2003	1,600	12	1.7	3	9		
	2/26/2004	1,400	13	1.1	2.8	6.6		
	5/27/2004	980	10	0.9 J	2.4	4.5		
	8/30/2004	1,100	11	1.4	4.2	7.6		
	2/24/2005	1,200	9.1	1.3	2.4	6.7		
	5/23/2005	1,700	17	12	42	69		
	8/30/2005	910	13	2.6	6.4	8.8		
	11/29/2005	1,100	10 U	1.4	2.6	5.6		
	2/23/2006	1,200	10 U	1.4	3.1	5.6		
	2/20/2000	1,200	100	1.7	J. I	5.0		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (μg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (µg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
	8/24/2006	410	6.38	1 U	1.88	7.55		
-	11/27/2006	1,390	6.42	2.68	1.32	5.05		
	2/12/2007	1,560	6.38	3.14	1 U	3 U		
MW-40R	8/29/2007	1,000	6.6	1 U	1.5	3.48		
(continued)	2/11/2008	1,100	3.18	1.09	1.24	7.12		
-	8/28/2008	1,070	4.91	1.2	2.29	5.97		
-	2/12/2009	855	3.65	1.25	3.39	6.4		
	3/17/1988		2.5 U	2 U	2 U	2 U		
-	3/27/1991		1 U	1 U	1 U	1 U		
-	6/24/1991		1	1 U	1 U	1 U		
MW-6	9/26/1991	500 U	0.5 U	0.5 U	0.5 U	0.5 U		
10100	12/26/1991	760	47	45	8.3	19		
-	12/9/1993	50 U	0.5 U	0.5 U	0.83	1 U	12	14
-	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
MW-7	3/17/1988		2.5 U	2 U	2 U	2 U		
10100-7	3/17/1988		1,050	359	37	237		
-	6/24/1991		47	5	72	17		
MW-8	12/9/1993	130	0.71	0.5 U	0.5	1 / 1 U	3.2	79
	11/21/1995	110	7.7	0.5 U	0.5 U	1 U	3.2	
	3/17/1988		2.5 U	2 U	2 U	2 U		
<u>-</u>	3/27/1991		140	8	3	20		
			280	1	4	20		
MW-9	6/24/1991 9/26/1991	220	1.1	0.5 U	0.5 U	0.54		
10100-9				0.5 U		0.54 0.5 U		
-	12/26/1991	50 U	9.3	0.5 U	0.5 U	1 U		
-	12/9/1993 11/21/1995	50 U 50 U	6.7		0.5 U	1 U	4.2	70
		250 U	1.3 1 U	0.5 U 1 U	0.5 U	3 U		
NAVA/ A 4	2/11/2008		1 U	1 U	1 U 1 U	3 U		
MW-A1	8/28/2008	134 145		_				
	2/12/2009		1 U	1 U	1 U	3 U		
NAVA / A O	2/11/2008	250 U	1 U	1 U	1 U	3 U		
MW-A2	8/28/2008	159	1 U 1 U	1 U	1 U	3 U		
	2/12/2009	188		1 U	1 U	3 U		
	8/22/1989		1 U	1 U	1 U	1 U		
RW-1/	3/27/1991		5	1 U	1 U	8		
MW-14	6/24/1991	2 200	1 U	1 U	1 U	1		
	9/26/1991	2,200	410	19	6.4	10		
DW 0	12/26/1991	3,200	590	170	11	56		
RW-2	2/11/2002	1,300 J	110	0.98 J	1.6	7.8		
UG-2	9/25/2000	5.98	61	2.5 U	7.45 U	31 U		
UG-8	9/25/2000	5.31			 7.0			
W-15R	2/28/2002	5,000	520	8.1	7.8	11		
	12/7/2000	2,600	0.67 J	0.2 U	6.6	3.2		
W-17	3/19/2001	2,000	0.2 U	10 U	1.1	11		
	5/16/2001	500	0.2 U	0.2 U	0.51 J	2.8 J		
	8/21/2001	1,900	1 U	0.54 J	0.2 U	0.6 U		
W-2	3/2/1990		0.3 U	0.3 U	0.5	1		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (μg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (μg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
	3/2/1990		0.3 U	0.3 U	0.3 U	0.3 U		
	12/7/2000	410	0.2 U	0.72 UJ	1 U	1.2 J		
	3/19/2001	280	0.2 U	0.2 U	0.2 U	0.8 J		
	5/17/2001	290	0.2 U	0.2 U	0.2 U	0.61 J		
	8/21/2001	230 J	0.2 U	0.2 U	0.47 J	0.6 U		
	3/1/2002	84 J	0.2 U	0.2 U	0.2 U	0.6 U		
	8/27/2002	460	0.2 U	0.2 U	0.2 J	0.6 U		
	11/26/2002	460	1 U	0.2 U	0.2 U	0.6 J		
	2/6/2003	390	1 U	0.2 U	0.26 J	0.94 J		
	5/15/2003	400	1.6	1 J	4.4	6.5		
	8/20/2003	290	0.2 U	0.2 U	0.2 U	0.6 U		
	11/14/2003	370	3.8	1.5	3	7.3		
	2/26/2004	200 J	0.2 J	0.2 U	0.2 U	0.9 J		
W-3	5/27/2004	200 J	0.2 J	0.3 J	0.5 J	1.2 J		
VV-3	8/30/2004	220 J	0.4 J	0.8 J	5 U	5 U		
	11/18/2004	390	1.3	0.9 J	1.3	3.7		
	2/24/2005	230 J	0.2 U	0.2 U	0.2 U	0.6 U		
	5/23/2005	550	2.3	5.3	17	30		
	8/30/2005	170 J	0.2 U	0.2 U	0.2 U	0.6 U		
	11/29/2005	450	0.2 U	0.2 U	0.2 U	0.6 U		
	2/23/2006	270	2 U	1.2	2.2	4.8		
	8/24/2006	100 U	1 U	1 U	1 U	3 U		
	11/27/2006	102	1 U	1 U	1 U	3 U		
	2/12/2007	352	1 U	1 U	1 U	3 U		
	8/29/2007	190	1 U	1 U	1 U	3 U		
	2/11/2008	271	1 U	1 U	1 U	3 U		
	8/28/2008	314	1 U	1 U	1 U	3 U		
	2/12/2009	239	1 U	1 U	1 U	3 U		
W-4	3/2/1990		7	17	7	15		
W-5	3/2/1990		3.5	0.3 U	0.3 U	0.3 U		
	12/7/2000	3,400	0.2 U	0.2 U	1 U	8		
	3/19/2001	3,400	0.39 J	20 U	3.2	27		
	5/16/2001	710	0.2 U	2 U	0.5 J	3.5		
	8/21/2001	2.2	1.1	7.3	0.2 U	0.6 U		
	2/28/2002	120 J	1.7	1.2	0.4 J	3.5		
	8/27/2002	850	1.8	0.2 U	2.5	3 U		
144.0	11/26/2002	2,300	1	1 U	1 U	10 U		
W-6	2/6/2003	400	3.3	0.6 J	0.89 J	2.7 J		
	5/15/2003	400	4.7	1.7	9.4	11		
	8/20/2003	530	1.4	1 U	1.9	3 U		
	11/14/2003	700	12	7.9	14	39		
	2/26/2004	150 J	1 U	2 U	1 U	3 J		
	5/27/2004	380	5	7.2	18	35		
	8/30/2004 11/18/2004	220 J 79 J	0.9 J	0.3 J	1.6	2.2 J 3.9		
	11/10/2004	193	1.8	0.9 J	1.5	ა.ყ		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (µg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	(µg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)	
WITCA Metho	od A Cleanup Level		5	700	1,000	1,000	15	15	
	2/24/2005	230 J	0.8 J	1 U	0.9 J	3 J			
	5/23/2005	2,900	22	53	170	300			
	8/30/2005	190 J	1.2	0.2 U	0.7 J	0.6 U			
	11/29/2005	48 U	0.2 U	0.2 U	0.2 U	0.6 U			
	2/23/2006	48 U	0.2 U	0.2 U	0.2 U	0.6 U			
W-6	8/24/2006	100 U	1 U	1 U	2.33	3 U			
(continued)	11/27/2006	670	1 U	1 U	1 U	3 U			
	2/12/2007	835	1.28	1 U	1.32	3 U			
	8/29/2007	603	1.03	1 U	1.08	3 U			
	2/21/2008	372	1.18	1 U	1 U	3 U			
	8/26/2008	1 U	1 U	1 U	1 U	3 U			
	2/12/2009	280	1 U	1 U	1 U	3 U			

J = The result is an approximation

μg/L = microgram per liter

MTCA = Model Toxics Control Act

TPH = Total Petroleum Hydrocarbon

U = Analyte was not detected above the reporting limit indicated

UJ = Analyte was not detected above the reporting limit. Indicated value is estimated reporting limit.

-- = Not analyzed

Bold and cell in orange = Result greater than MTCA Method A cleanup level

Bold and cell in yellow = Analyte not detected, but reporting limt is greater than MTCA Method A cleanup level.

 Table 7
 Analytical Results for Polycyclic Aromatic Hydrocarbons in Groundwater

					Benzo(a)	Benzo(a)	Benzo(b)	Benzo(g,h,i)	Benzo(k)	.	Dibenz(a,h)			Indeno(1,2,3-cd)		.	_	
Well ID	Date Sampled	Acenaphthene (µg/L)	Acenaphthylene (µg/L)	Anthracene (µg/L)	anthracene* (µg/L)	pyrene* (µg/L)	fluoranthene* (µg/L)	perylene (µg/L)	fluoranthene* (µg/L)	Chysene* (µg/L)	anthracene* (µg/L)	Fluoranthene (µg/L)	Fluorene (µg/L)	pyrene* (μg/L)	Naphthalene (µg/L)	Phenanthrene (µg/L)	Pyrene (µg/L)	cPAHs ¹ (µg/L)
	ITCA Method A					0.4												0.4
	Cleanup Level					0.1												0.1
l N	ITCA Method B Cleanup Level																	
	Carcinogenic																480	
N	ITCA Method B																	
	Cleanup Level																	
No	n-Carcinogenic	960		4,800											160			
B-2_wel	12/1/1993	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
MW-6	12/1/1995 12/1/1993	5 U 5 U	5 U 5 U	5 U 5 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	5 U 5 U	0.1 U 0.1 U	5 U 5 U	5 U 5 U	0.5 U 0.5 U	0.0755 U 0.0755 U
	12/1/1993	1 U	1 U	1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	1 U	0.1 U	1 U	1 U	0.5 U	0.0755 U
MW-8	12/1/1995	5 U	5 U	5 U	0.41	0.1 U	0.1 U	0.1 U	0.1 U	1.2	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0733
MW-9	12/1/1993	1 U	1 U	1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	1 U	0.1 U	1 U	1 U	0.5 U	0.0755 U
10100-9	12/1/1995	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
	12/1/1993	1 U	1 U	1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	1.2	1 U	0.1 U	1 U	1 U	1.1	0.0755 U
MW-10	11/22/1995 12/8/2000	5 U 8.1 U	5 U 9.9 J	5 U 2	0.65 2.75	0.29 2.07	0.15 1.73	0.19 2.1 J	0.1 U 0.58 J	3.7 10.3	0.28 0.3 U	1.5 5.7	5 U 5 J	0.1 U 2.36 J	5 U 8.1 U	5 U 13.1	1.6 19.2	0.445 2.93
	2/28/2002	3 J	9.9 J	0.4	0.1	0.1	0.1 J	0.2 J	0.56 J	0.08 U	0.3 U	0.8	1	0.1 J	1 U	2	19.2	0.1374
	12/1/1993	2.1	1 U	1.1	4.9	1.4	0.1 U	0.1 U	0.45	1.3	0.1 U	1.7	1.8	1	1 U	4.1	3.8	2.058
	12/8/2000	0.76 U	0.76 U	0.028 U	0.019 U	0.019 U	0.036 U	0.095 U	0.0095 U	0.057 U	0.028 U	0.028 U	0.16 U	0.063 U	0.76 U	0.068 U	0.16 U	0.01756
MW-11	3/19/2001	0.76 U	0.76 U	0.038 J	0.047 J	0.03 J	0.036 U	0.095 U	0.0095 U	0.057 U	0.028 U	0.082 J	0.16 U	0.063 U	0.76 U	0.095 J	0.16 U	0.04181
10100 11	5/16/2001	0.8 U	2.7 J	0.11 J	0.04 J	0.04 J	0.4 U	0.09 U	0.017 J	0.19 J	0.03 U	0.054 J	0.43 J	0.07 J	2.7 J	0.07 U	0.52 J	0.0761
	8/21/2001	0.8 U	0.8 U	0.03 U	0.05 J	0.04 J	0.04 U	0.09 U	0.01 J	0.16 J	0.03 U	0.03 U	0.2 U	0.06 U	0.8 U	0.07 U	0.2 U	0.0541
-	2/28/2002 12/1/1993	0.8 U 5 U	0.8 U 5 U	0.04 U 5 U	0.02 U 0.1 U	0.02 U 0.1 U	0.04 U 0.1 U	0.1 U 0.1 U	0.02 U 0.1 U	0.08 U 0.1 U	0.04 U 0.1 U	0.04 U 0.11	0.2 U 5 U	0.08 U 0.1 U	1 U 5 U	0.08 U 5 U	0.2 U 0.5 U	0.0204 U 0.0755 U
MW-12	11/22/1995	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	61	0.1 U	0.11	5 U	0.1 U	5 U	5 U	0.5 U	0.685
NAVA 4 0	12/1/1993	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
MW-13	11/22/1995	5 U	5 U	5 U	0.76	2	1.4	2.2	0.72	2.5	0.83	2.2	5 U	1.2	5 U	5 U	2	2.516
MW-15		5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
MW-16		5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
MW-17	12/1/1993 12/1/1993	5 U 17	5 U 5 U	5 U 5 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 17	5 U 13	0.1 U 0.1 U	5 U 5 U	5 U 5 U	0.5 U 0.5 U	0.0755 U 0.0755 U
MW-18	12/1/1995	8	5 U	5 U	7.4	0.1 U	0.1 U	0.1 U	0.1 U	20	0.1 U	13	13	0.1 U	7.2	23	9.2	1.01
	2/28/2002	1 J	3 J	0.3 U	0.03 J	0.04 J	0.04 U	0.1 U	0.02 U	0.08 U	0.04 U	0.3	0.5 J	0.08 U	1 U	0.4	0.8 U	0.0524
	12/7/2000	0.77 U	2.6 J	0.029 U	0.019 U	0.019 U	0.037 U	0.096 U	0.0096 U	0.123 J		0.029 U	0.16 U	0.064 U	0.77 U	0.067 U	0.16 U	0.01866
	3/19/2001	0.76 U	4.29 J	0.029 U	0.019 U	0.019 U	0.036 U	0.095 U	0.0095 U	0.057 U	0.029 U	0.029 U	0.27 J	0.064 U	0.79 J	0.067 U	0.16 U	0.01766 U
MW-19		0.6 U	6.6 J	0.17 J	0.02 U	0.02 U	0.04 U	0.09 U	0.009 U	0.06 U	0.03 U	0.03 U	0.78 J	0.06 U	0.8 U	0.7 U	0.2 U	0.01825 U
	8/21/2001 2/28/2002	0.8 U 0.8 U	0.8 U 0.8 U	0.03 U 0.04 U	0.02 U 0.02 U	0.02 U 0.02 U	0.04 U 0.04 U	0.09 U 0.1 U	0.009 U 0.02 U	0.06 U 0.08 U	0.03 U 0.04 U	0.03 U 0.04 U	0.21 J 0.2 U	0.06 U 0.08 U	0.8 U 1 U	0.06 U 0.08 U	0.2 U 0.2 U	0.01825 U 0.0204 U
	12/7/2000	1.3 J	2.53 J	0.04 U 0.159 J	0.02 U	0.02 U	0.04 U	0.1 U	0.0098 U	0.059 U	0.04 U	0.04 U	1.03	0.066 U	2.47 J	0.08 J	0.2 U 0.58 J	0.0204 U
NAVA CO	2/10/2001	0.76 U	0.76 U	0.19	0.019 U	0.02 U	0.036 U	0.095 U	0.0095 U	0.053 U	0.028 U	0.056 J	1.05	0.064 U	0.76 U	0.144 J	0.31 J	0.01761 U
MW-20	5/17/2001	0.9 J	2.3 J	0.3	0.02 J	0.02 J	0.04 U	0.1 U	0.01 J	0.06 U	0.035 J	0.16 J	1.3	0.073 J	0.8 U	0.35	1.4	0.0361
	2/28/2002	0.9 U	0.9 U	0.3	0.02 U	0.02 U	0.04 U	0.1 U	0.02 U	0.09 U	0.04 U	0.06 J	0.6 J	0.09 U	1 U	0.09 J	0.9 U	0.01995 U
MW-21	2/28/2002	4 U	4 U	5	2	0.9	2	0.5 U	0.3 J	12	0.3 J	1	6	0.9 J	5 U	7	1 U	1.57
MW-27	12/1/1995	5 U	5 U	5 U	2.1	0.1 U	0.1 U	0.1 U	0.1 U	0.8	0.1 U	1.4	5 U	0.1 U	5 U	5 U	1.5	0.288
MW-28	12/1/1993 12/1/1995	5 U 5 U	5 U 5 U	5 U 5 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.18	0.1 U 0.1 U	0.1 U 0.1 U	5 U 5 U	0.1 U 0.1 U	5 U 5 U	5 U 5 U	0.5 0.5 U	0.0755 U 0.0768
MW-30		5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
MW-35	12/9/2000	0.79 U	0.81 J	0.045 J	0.02 U	0.02 U	0.037 U	0.098 U	0.0098 U	0.294 J	0.031 J	0.029 U	0.17 U	0.066 U	0.79 U	0.069 U	0.17 U	0.02268
	3/19/2001	0.77 U	0.77 U	0.029 U	0.02 J	0.019 U	0.037 U	0.096 U	0.0096 U	0.064 J	0.029 U	0.029 U	0.16 U	0.064 U	0.77 U	0.067 U	0.16 U	0.01912
MW-37	11/22/1995	5 U	5 U	5 U	0.1 U	0.1 U	0.14	0.1 U	0.1 U	0.1 U	2.8	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.3595

Table 7 Analytical Results for Polycyclic Aromatic Hydrocarbons in Groundwater

			Acenaphthylene		anthracene*	Benzo(a) pyrene*	Benzo(b) fluoranthene*		Benzo(k) fluoranthene*		Dibenz(a,h) anthracene*	Fluoranthene			Naphthalene	Phenanthrene	Pyrene	cPAHs ¹
Well ID	Sampled	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(μg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
	CA Method A																	
С	leanup Level					0.1												0.1
MT	CA Method B																	
С	leanup Level																	
	Carcinogenic																480	
MT	CA Method B																	
С	leanup Level																	
Non-	Carcinogenic	960		4,800											160			
	12/8/2000	3.8 U	27.3 J	0.6 J	0.45	0.243 J	0.18 U	0.48 U	0.048 U	1.9	0.14 U	0.73 J	4	0.4 J	4.4 J	2.9	6.4	0.3654
	3/19/2001	7.7 U	29.7 J	0.93 J	0.9	0.33 J	0.37 U	1 U	0.097 U	5.4	0.29 U	0.95 J	4.8 J	0.89 J	7.7 U	3.9	1.6 U	0.60085
MW-40R	5/16/2001	4 U	21 J	0.76 J	0.1 U	0.2 J	0.2 U	0.5 J	0.08 J	0.3 U	0.1 U	1	5	0.63 J	4 J	2.1	13	0.2925
	8/21/2001	8 U	8 U	0.96 J	1.4	0.6 J	0.7	0.9 U	0.2 J	7.7	0.3 U	1.5 J	6.3 J	0.68 J	8 U	5.7	21	0.99
	2/28/2002	4 U	4 U	0.2 U	0.3 J	0.3 J	0.3 J	0.5 U	0.1 U	0.4 U	0.2 U	1	3 J	0.4 U	5 U	3	0.9 U	0.397
W-15R	2/28/2002	50 J	40 J	78	9	5	4	3 J	2	26	0.5 U	51	90	3 J	10 U	200	2 U	7.085
	12/7/2000	4.6 J	5.6 J	2.2	2	1.45	0.97	1.1 J	0.4	8	0.14 U	4	6.5	1.28 J	3.8 U	14.4	27.9	2.002
W-17	3/19/2001	7.9 U	7.9 U	4.3	3.74	2.05	1.63	1.4 J	0.473 J	21.8	0.3 U	5.8	10.1	0.66 U	7.9 U	25.5	58.8	2.9003
	5/16/2001	6 J	6 J	5 5	2.1	1.7	1.1	0.5 U	0.7 0.7	7.6	0.46 J	8	12	2.5	4 U	7	95	2.462
	8/21/2001 12/7/2000	8 U 1.2 J	8 U 6.79 J	0.191 J	4.4 0.02 U	2.1 0.02 U	1.9 0.038 U	0.9 U 0.1 U	0.7 0.01 U	23 0.06 U	0.3 U 0.03 U	0.03 U	19 0.76 J	0.6 U 0.067 U	6 U 1.29 J	37 0.071 J	120 0.17 U	3.075 0.01855 U
	3/19/2001	1.2 J 1.1 J	6.97 J	0.1913	0.02 U	0.02 U	0.036 U	0.1 U	0.0096 U	0.06 U	0.03 U	0.03 U	1.44	0.067 U	1.29 J	0.0713 0.067 U		0.017665 U
W-3	5/17/2001	2.4 J	20	0.33	0.019 U	0.019 U	0.036 U	0.09 U	0.0096 U	0.037 U	0.029 U	0.029 3	3.2	0.06 U	1.33 3	0.007 0	0.10 0	0.017663 U
** 5	8/21/2001	0.9 J	0.8 U	0.03 U	0.02 U	0.02 U	0.04 U	0.09 U	0.009 U	0.06 U	0.03 U	0.03 U	0.9	0.06 U	1.2 J	0.06 U	0.3 T	0.01825 U
	3/1/2002	0.9 U	0.9 U	0.04 U	0.02 U	0.02 U	0.04 U	0.1 U	0.02 U	0.09 U	0.04 U	0.04 U	0.5 J	0.09 U	1 U	0.09 U	0.2 U	0.02095 U
	12/7/2000	130 J	118 J	96	58.1	32	26.9	10 U	5.9 J	341	3 U	110	242	31	80 U	680	728	47.75
	3/19/2001	7.9 U	14 J	2.4	1.41	0.74 J	0.57 J	1 U	0.098 U	0.59 U	0.3 U	2.3	9.5	0.84 J	7.9 U	17.5	1.7 U	1.04485
W-6	5/16/2001	4 U	4 U	0.26 J	0.2 J	0.3 J	0.26 J	0.5 U	0.14 J	0.6 J	0.16 J	0.58 J	0.8 U	0.82 J	4 U	0.49 J	12	0.464
	8/21/2001	8 U	8 U	0.34 J	1.1	0.6 J	0.7	0.9 U	0.26 J	7.2	0.3 U	0.58 J	2.6 J	0.86 J	6 U	1.9 J	22	0.979
	2/28/2002	4 U	4 U	0.2 U	0.2 J	0.3 J	0.4 J	0.5 U	0.1 J	0.4 U	0.2 U	0.5 J	0.9 U	0.8 J	5 U	0.8 J	0.9 U	0.462

J = The result is an approximation

μg/L = microgram per liter

MTCA = Model Toxics Control Act

TEQ = toxicity-equivalent quotient

U = Analyte not detected above the reporting limit indicated

-- = Not analyzed

Bold and cell in orange = Result greater than MTCA Method A cleanup level.

^{*}Compound is cPAH constituent included in TEQ-adjusted total cPAH concentrations. Values for individual cPAH constituents are actual analytical results.

^{1.} Total cPAH concentration expressed as TEQ-adjusted concentration adjusted using Toxicity Equivalency Factors for Maximum Required cPAHs (Table 708-2 under WAC 173-340-708). cPAH = carcinogenic polycyclic aromatic hydrocarbon

Table 8 Statistical Summary of Soil Analytical Results

Parameter	CAS Number	Analyte	MTCA A Unrestricted (mg/kg)	MTCA A Industrial (mg/kg)	MTCA B Carcinogen (mg/kg)	MTCA B Noncarcinogen (mg/kg)	Indicator Hazardous Substance (yes/no)	Number Analyzed	Frequency of Detection (percent)	Maximum Detection Limit (mg/kg)	Minimum Detection Limit (mg/kg)	Maximum Result (mg/kg)	Minimum Result (mg/kg)	Average Result (mg/kg)	Number of Results Exceeding MTCA A Industrial	Number of Results Exceeding MTCA A Unrestricted	Number of Results Exceeding MTCA B Carcinogen	Number of Results Exceeding MTCA B Noncarcinogen
Metals		Lead	250	1000			no	38	71	15	10	860	2.8	108	0	3	0	0
	120-12-7	Anthracene				24,000	no	22	18	2	0.1	4.9	0.1	1.4	0	0	0	0
		Pyrene				2,400	no	22	32	2	0.02	1.35	0.0482	0.62	0	0	0	0
		Benzo(g,h,i)perylene					no	22	23	2	0.01	0.744	0.0728	0.31	0	0	0	0
	193-39-5	Indeno(1,2,3-cd)pyrene					no	22	27	2	0.1	1.43	0.0157	0.31	0	0	0	0
		Benzo(b)fluoranthene					no	22	27	2	0.1	0.468	0.0173	0.20	0	0	0	0
	206-44-0	Fluoranthene				3,200	no	22	36	2	0.1	1.75	0.019	0.52	0	0	0	0
		Benzo(k)fluoranthene					no	22	23	2	0.01	0.16	0.0365	0.097	0	0	0	0
	208-96-8	Acenaphthylene					no	22	14	2	0.1	2.98	0.168	1.4	0	0	0	0
SVOCs	218-01-9	Chysene					no	22	27	2	0.1	25.2	0.0597	6.9	0	0	0	0
		Benzo(a)pyrene	0.1	2	0.14		yes	22	27	2	0.1	0.26	0.0106	0.10	0	3	2	0
	53-70-3	Dibenz(a,h)anthracene					no	22	14	2	0.01	0.409	0.0312	0.17	0	0	0	0
		Benzo(a)anthracene					no	22	23	2	0.01	4.25	0.0479	1.1	0	0	0	0
	83-32-9	Acenaphthene				4,800	no	22	9	2	0.1	1.27	0.32	0.80	0	0	0	0
	85-01-8	Phenanthrene					no	22	41	0.5	0.1	4.9	0.12	1.0	0	0	0	0
	86-73-7	Fluorene				3,200	no	22	18	2	0.1	3.52	0.17	1.6	0	0	0	0
	91-20-3	Naphthalene				1,600	no	22	5	2	0.1	1.1	1.1	1.1	0	0	0	0
	91-20-3	cPAH ¹	0.1	2	0.14		yes	22	27	1.51	0.0755	0.6868	0.03818	0.33	0	4	4	0
	TPH_O&G	Oil and Grease					na	12	83	5	5	33,500	174	5,356	0	0	0	0
Oil and	TPH	TPH	2,000	2,000			yes	152	91	10	5	730,000	7	11,470	58	58	0	0
Grease	TPH-D	TPH-Diesel	2,000	2,000			yes	67	82	10	2	27,100	7	1,627	11	11	0	0
TPH	TPH-G	TPH-Gas	30	30			yes	50	50	50	1	6,050	1	632	17	17	0	0
	TPH-O	TPH-Oil	2,000	2,000			yes	37	76	471	25	52,300	41	2,438	3	3	0	0
	71-43-2	Benzene	0	0			yes	80	30	34	0.01	15	0.04	2.70	3	3	0	0
voc	100-41-4	Ethylbenzene	6	6			no	80	15	8	0.01	5.3	0.02	0.90	0	0	0	0
VOC	108-88-3	Toluene	7	7			no	80	26	30.5	0.015	12.975	0.26	4.07	4	4	0	0
	1330-20-7	Total Xylene	9	9			no	80	15	2.5	0.015	6.6	0.035	1.25	12	12	0	0

1. Total cPAH concentration expressed as TEQ-adjusted concentration adjusted using Toxicity Equivalency Factors for Maximum Required cPAHs (Table 708-2 under WAC 173-340-708). CAS = Chemical Abstract Service

cPAH = carcinogenic polycyclic aromatic hydrocarbons

mg/kg = microgram per kilogram MTCA = Model Toxics Control Act

SVOC = Semivolatile Organic Compound

TPH = Total Petroleum Hydrocarbon

VOC = Volatile Organic Compound

ExxonMobil/ADC Everett Facility Project No.: 8-915-15716-C

 Table 9
 Statistical Summary of Groundwater Analytical Results

Parameter	CAS Number	Analyte	MTCA A Groundwater (μg/L)	MTCA B Carcinogen (µg/L)	MTCA B Noncarcinogen (µg/L)	Indicator Hazardous Substance (yes/no)	Number Analyzed	Frequency of Detection (percent)	Maximum Detection Limit	Minimum Detection Limit	Maximum Result (µg/L)	Minimum Result (µg/L)	Average Result (µg/L)	Number of Results Exceeding MTCA A	Number of Results Exceeding MTCA B Carcinogen	Number of Results Exceeding MTCA B Noncarcinogen
Metals	7439-92-1	Total Lead	15			no	20	100			230	10	65	17		
Wiotalo		Dissolved Lead	15			yes	20	75	2	2	12	2	4	0		
		Anthracene			4,800	no	64	44	5	0.028	96	0.028	4.9	0	0	0
		Pyrene			480	no	64	38	2	0.16	728	0.16	18.25	0	0	1
		Benzo(g,h,i)perylene				no	64	13	10	0.09	10	0.09	0.51	0	0	0
	193-39-5	Indeno(1,2,3-cd)pyrene				no	64	30	0.66	0.06	31	0.06	0.85	0	0	0
		Benzo(b)fluoranthene				no	64	28	0.4	0.036	26.9	0.036	0.77	0	0	0
		Fluoranthene			640	no	64	56	0.1	0.028	110	0.028	3.84	0	0	0
		Benzo(k)fluoranthene				no	64	31	0.1	0.009	5.9	0.009	0.248	0	0	0
	208-96-8	Acenaphthylene				no	64	33	8	0.76	118	0.76	7.7	0	0	0
SVOCs	218-01-9	Chysene				no	64	41	0.59	0.057	341	0.057	8.9	0	0	0
	50-32-8	Benzo(a)pyrene	0.1			yes	64	41	0.1	0.019	32	0.019	0.89	20	0	0
	53-70-3	Dibenz(a,h)anthracene				no	64	13	3	0.028	3	0.028	0.22	0	0	0
	56-55-3	Benzo(a)anthracene				no	64	45	0.1	0.019	58.1	0.019	1.7	0	0	0
	83-32-9	Acenaphthene			960	no	64	23	8.1	0.6	130	0.6	6.46	0	0	0
	85-01-8	Phenanthrene				no	64	44	5	0.06	680	0.06	18.0	0	0	0
	86-73-7	Fluorene			640	no	64	52	5	0.16	242	0.16	8.8	0	0	0
	91-20-3	Naphthalene			160	no	64	16	80	0.76	80	0.76	5.0	0	0	0
		cPAH ¹	0.1		160	yes	64	56	0.0755	0.01761	47.75	0.01756	1.32	36	26	0
	TPH_O&G	Oil and Grease	na			na	12	100			132,000	2,700	31,150	12		
Oil and	TPH	TPH	500			yes	56	66	1,000	500	1,058,000	1.1	38,955	0		
	TPH-D	TPH-Diesel	500			yes	232	93	500	77	300,000	20	7,951	181		
Grease TPH	TPH-G	TPH-Gas	800			yes	231	69	500	1	5,980	1	671	59		
	TPH-O	TPH-Oil	500			yes	181	86	500,000	93.9	500,000	49	6,782	108		
	71-43-2	Benzene	5			yes	286	50	10	0.2	1,100	0.2	37.30	73		
voc	100-41-4	Ethylbenzene	700			no	286	33	20	0.2	359	0.2	6.15	0		
VOC	108-88-3	Toluene	1000			no	286	43	7.45	0.2	351	0.2	7.47	0		
	1330-20-7	Total Xylene	1000			no	286	50	31	0.3	1,941	0.3	26.7	2		

1. Total cPAH concentration expressed as TEQ-adjusted concentration adjusted using Toxicity Equivalency Factors for Maximum Required cPAHs (Table 708-2 under WAC 173-340-708). CAS = Chemical Abstract Service

cPAH = carcinogenic polycyclic aromatic hydrocarbon

μg/L = microgram per liter

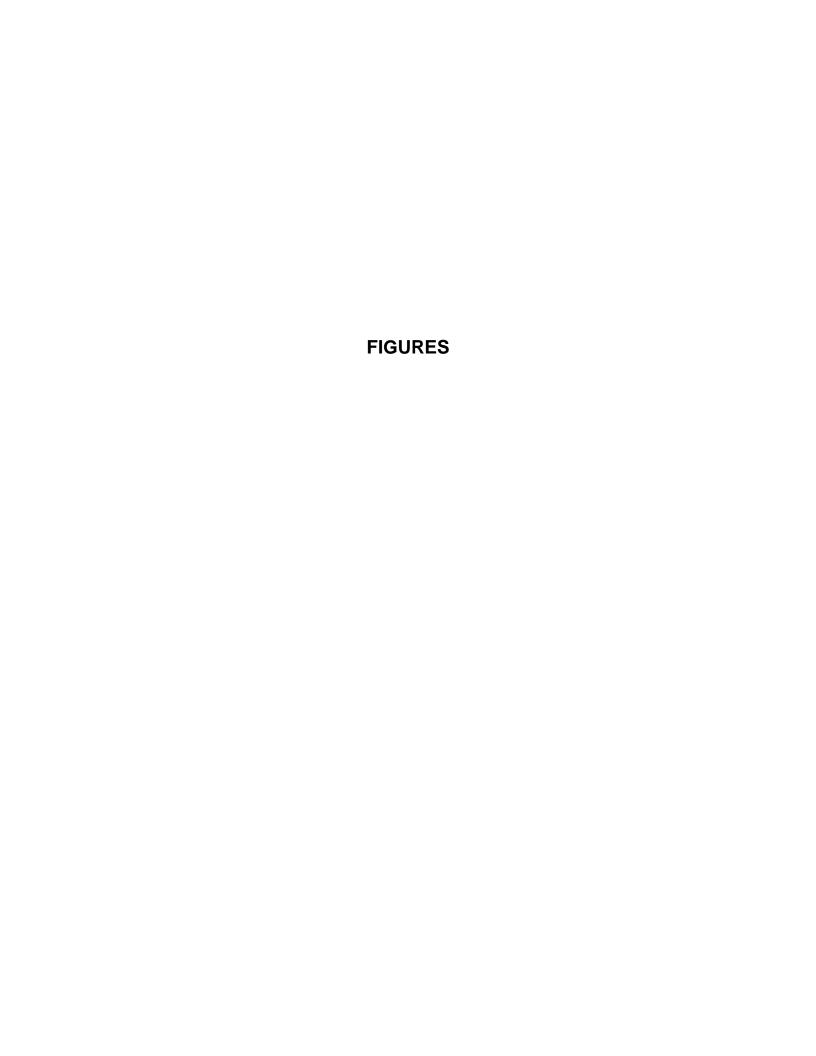
MTCA = Model Toxics Control Act

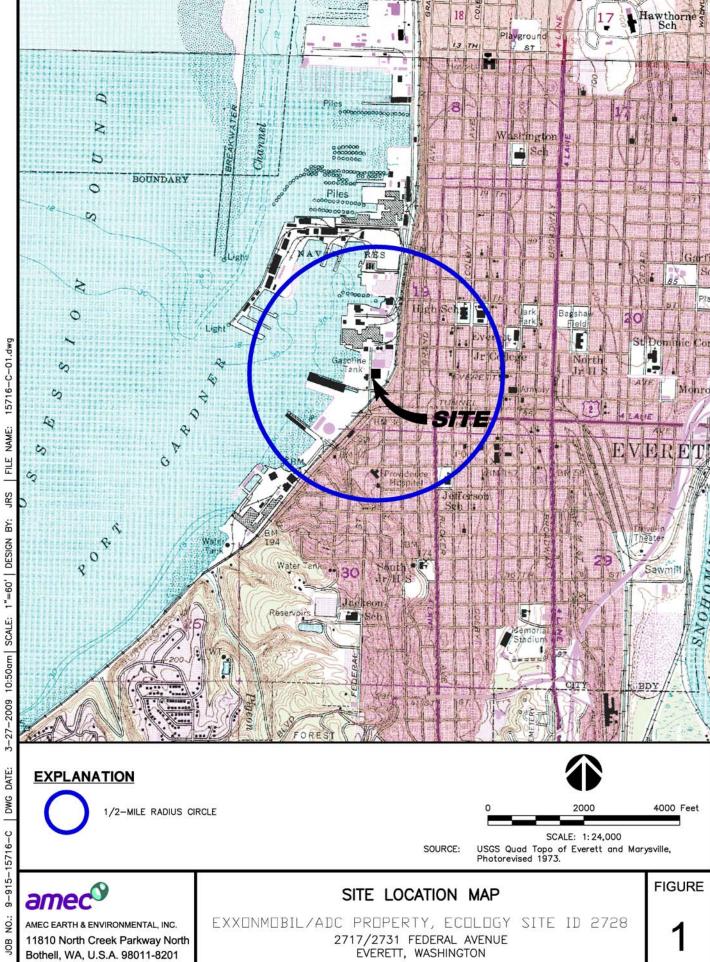
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SVOC = Semivolatile Organic Compound

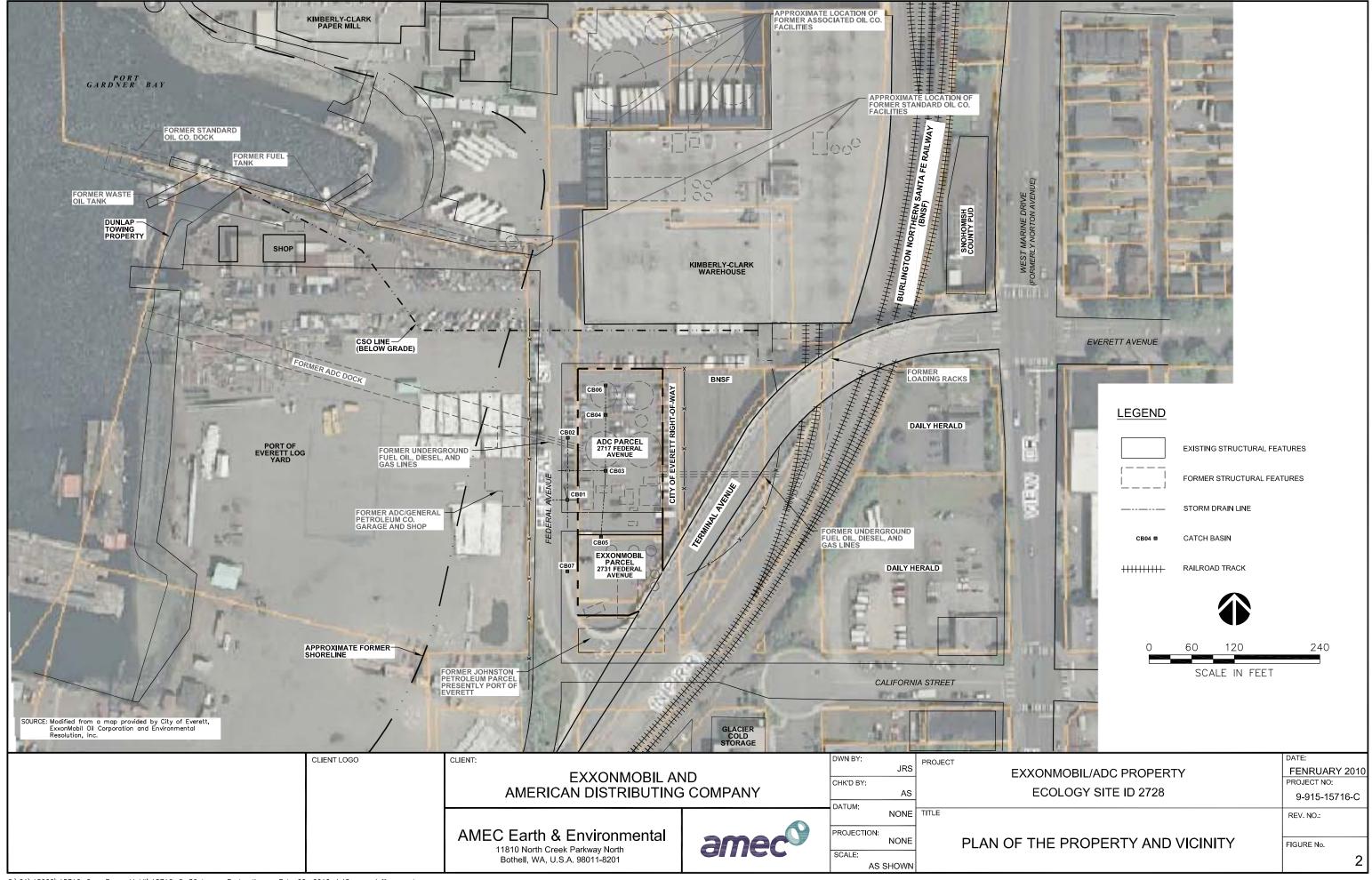
TPH = Total Petroleum Hydrocarbon

VOC = Volatile Organic Compound

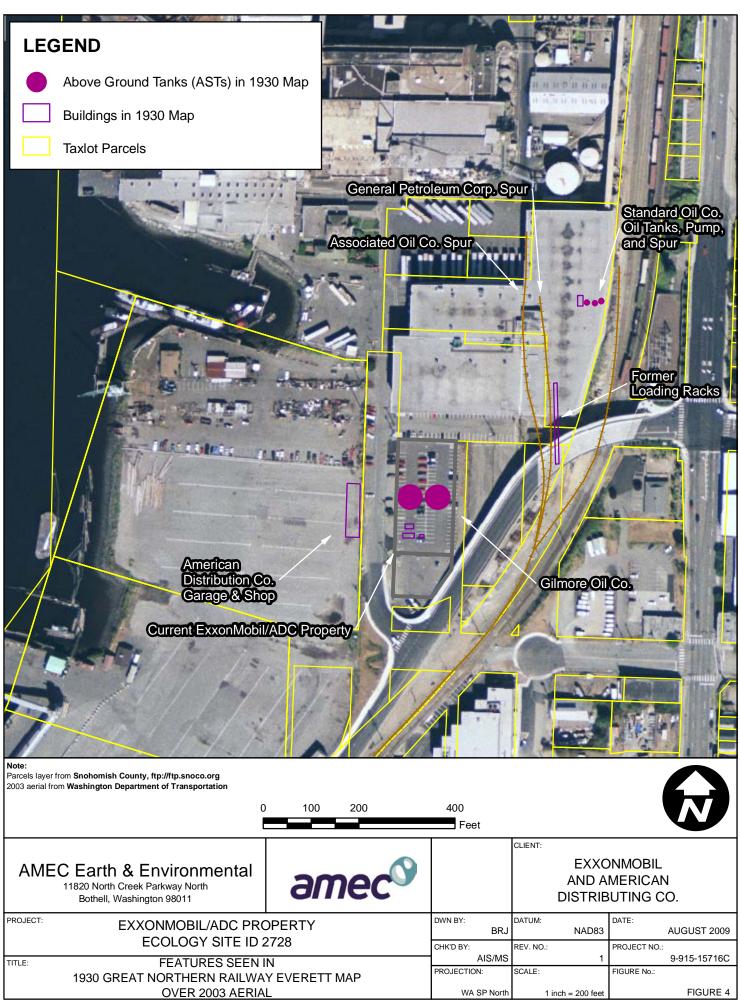




NO.:









Parcels layer from Snohomish County, ftp://ftp.snoco.org 2003 aerial from Washington Department of Transportation

400 100 200 Feet



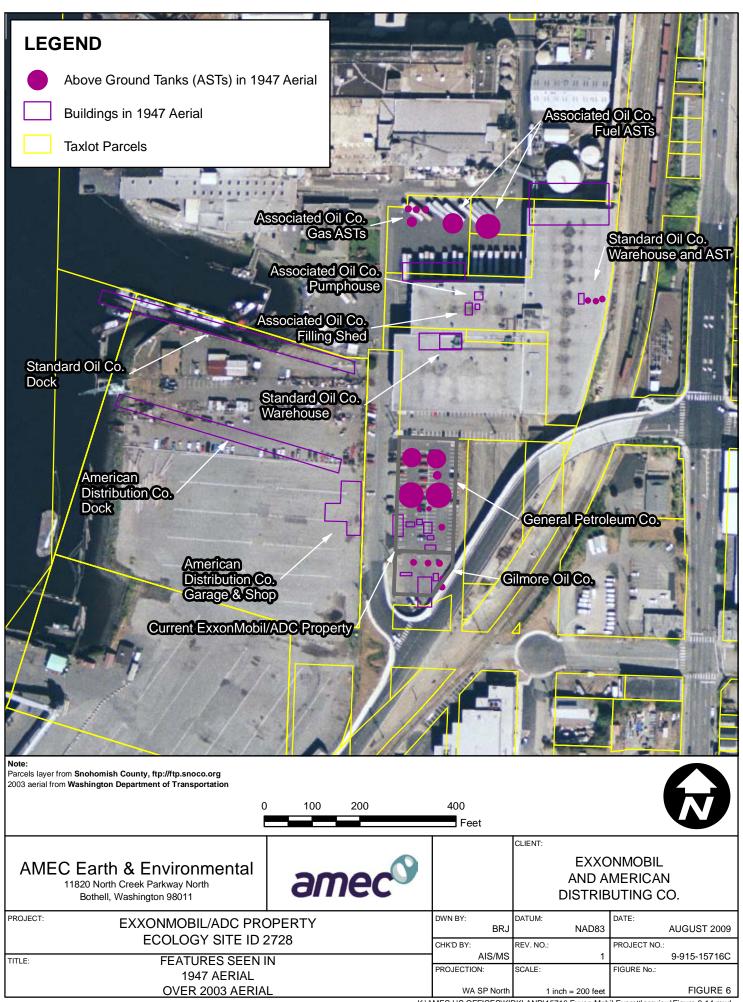
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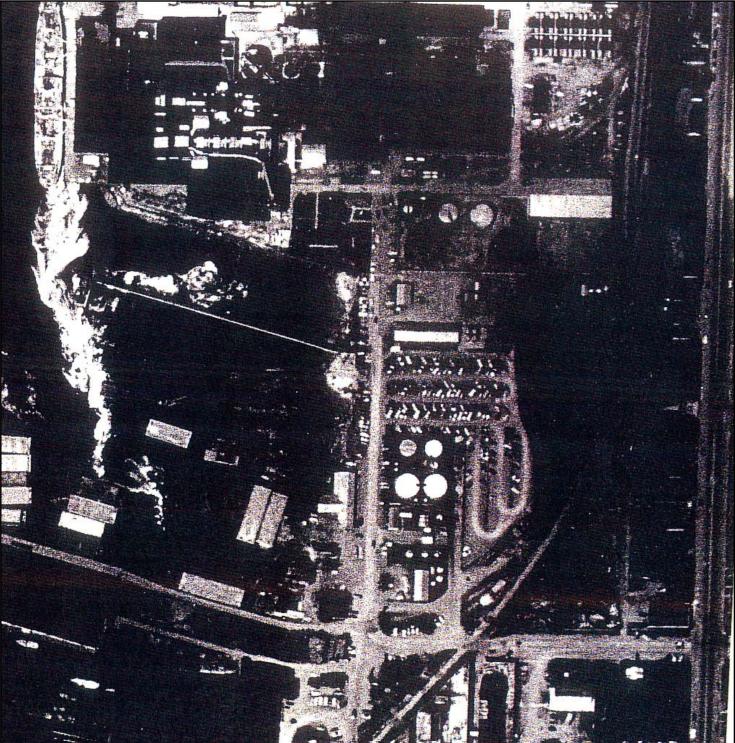
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EXXONMOBIL AND AMERICAN DISTRIBUTING CO.

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CLIENT:





Note: Parcels layer from Snohomish County, ftp://ftp.snoco.org 2003 aerial from Washington Department of Transportation

400 100 200 Feet



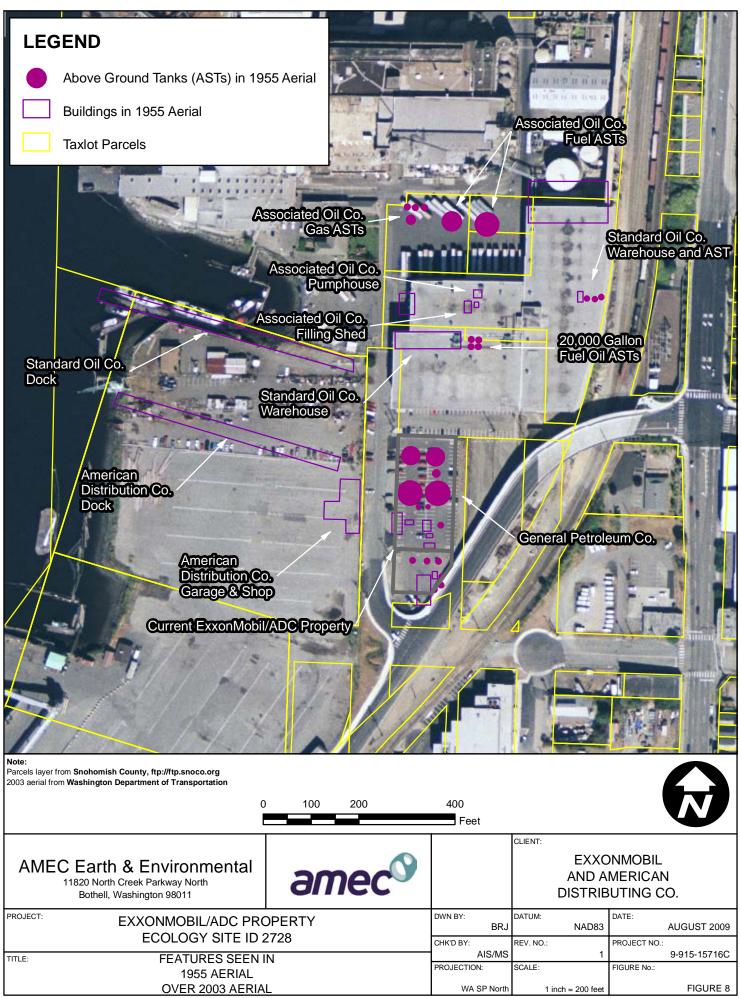
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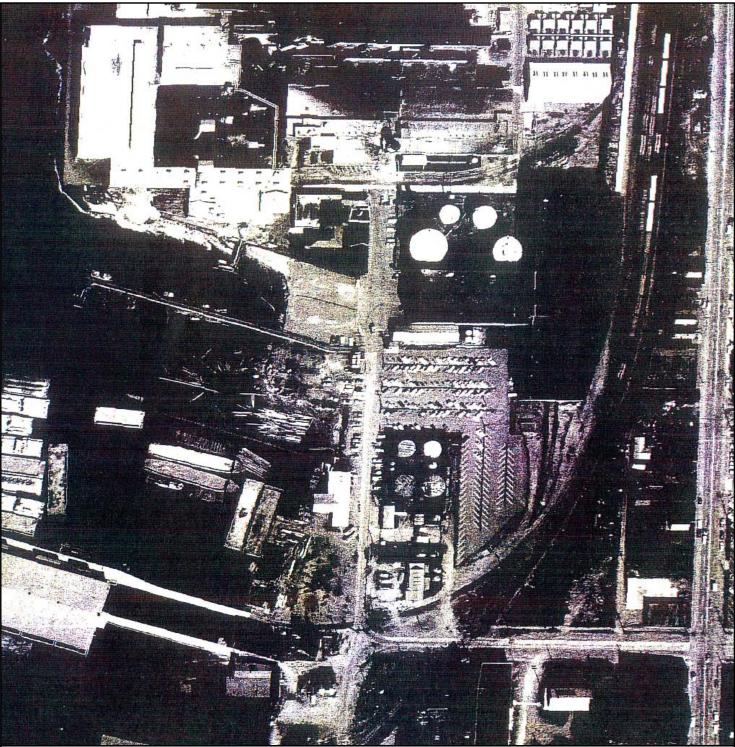
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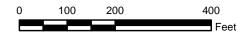
EXXONMOBIL AND AMERICAN DISTRIBUTING CO.

PROJECT: DWN BY: DATUM: EXXONMOBIL/ADC PROPERTY BRJ NAD83 AUGUST 2009 **ECOLOGY SITE ID 2728** CHK'D BY: REV. NO.: PROJECT NO.: AIS/MS 9-915-15716C TITLE: PROJECTION: SCALE: FIGURE No.: AERIAL 1955 1 inch = 200 feet





Note:
Parcels layer from Snohomish County, ftp://ftp.snoco.org
2003 aerial from Washington Department of Transportation





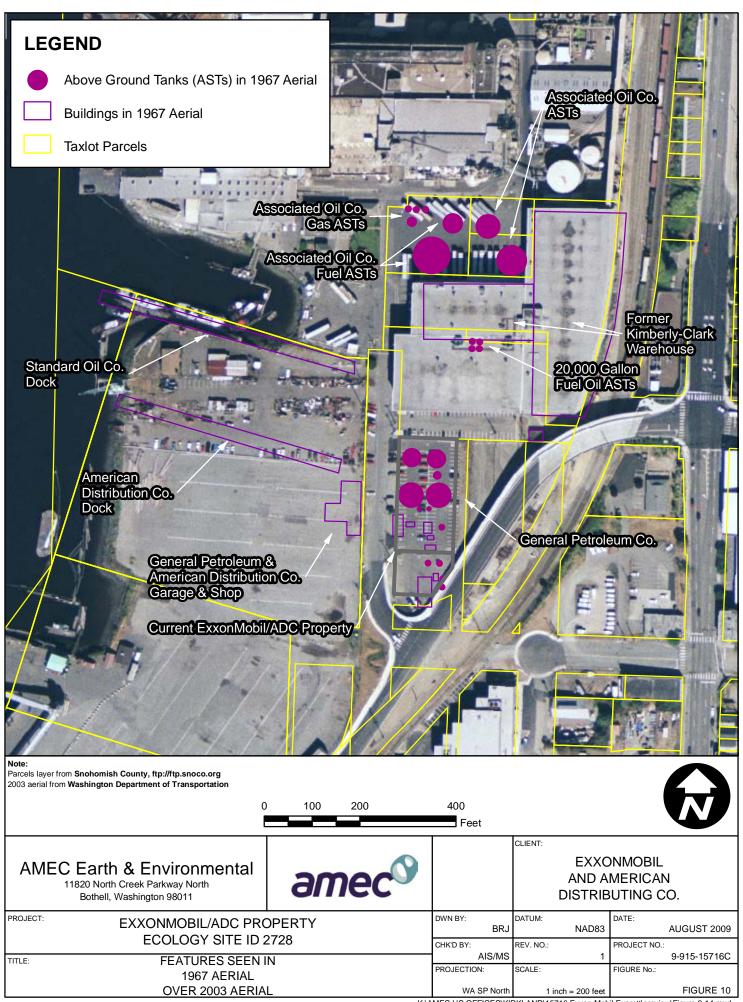
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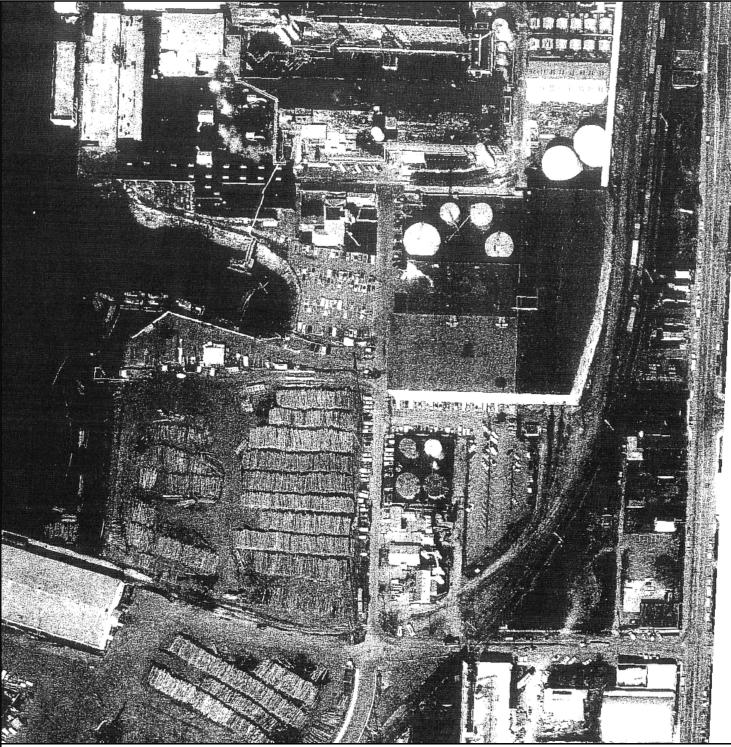
11820 North Creek Parkway North

amec

EXXONMOBIL AND AMERICAN DISTRIBUTING CO.

Bothell, Washington 98011 PROJECT: DWN BY: DATUM: EXXONMOBIL/ADC PROPERTY BRJ NAD83 AUGUST 2009 **ECOLOGY SITE ID 2728** CHK'D BY: REV. NO.: PROJECT NO.: AIS/MS 9-915-15716C TITLE: PROJECTION: FIGURE No.: AERIAL 1967 FIGURE 9 1 inch = 200 feet





Parcels layer from Snohomish County, ftp://ftp.snoco.org 2003 aerial from Washington Department of Transportation

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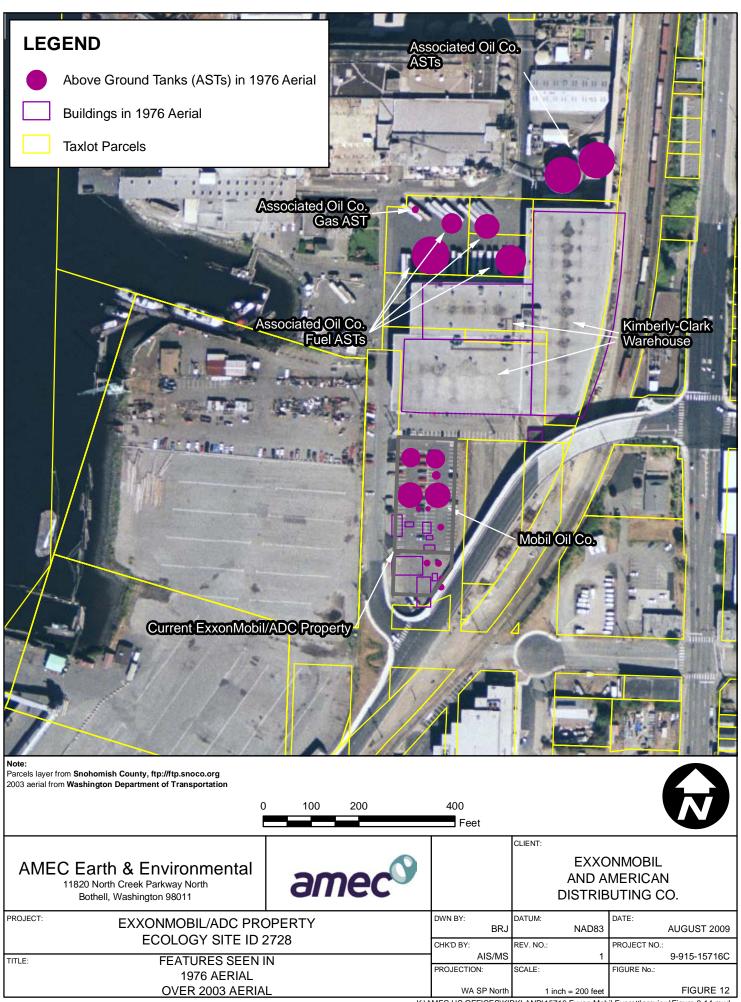
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Note:

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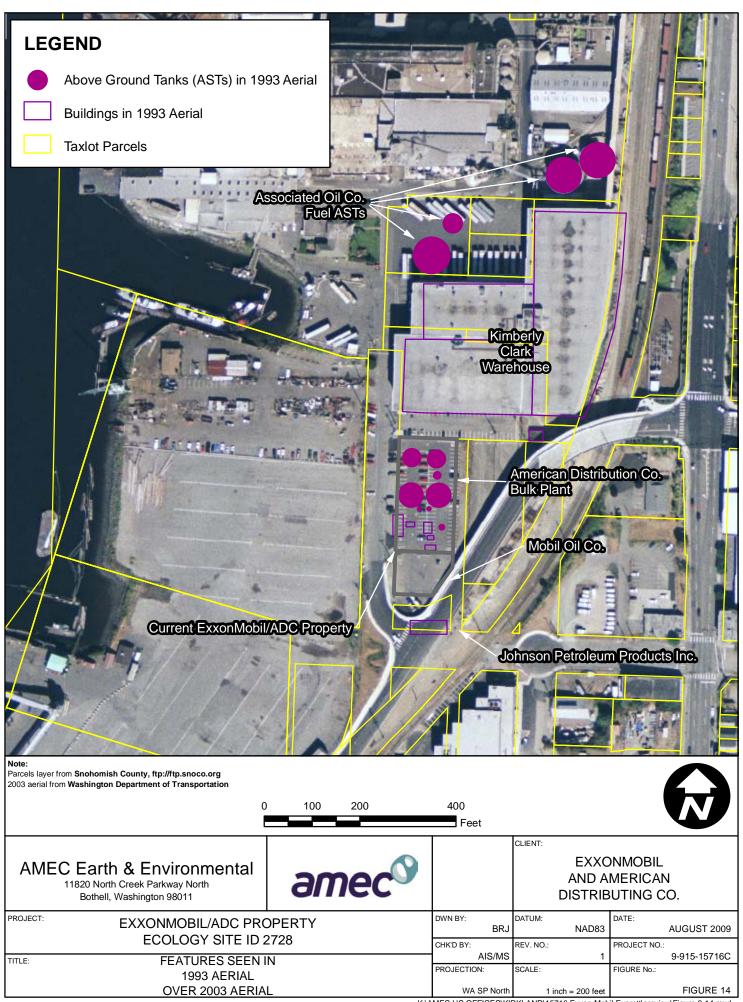


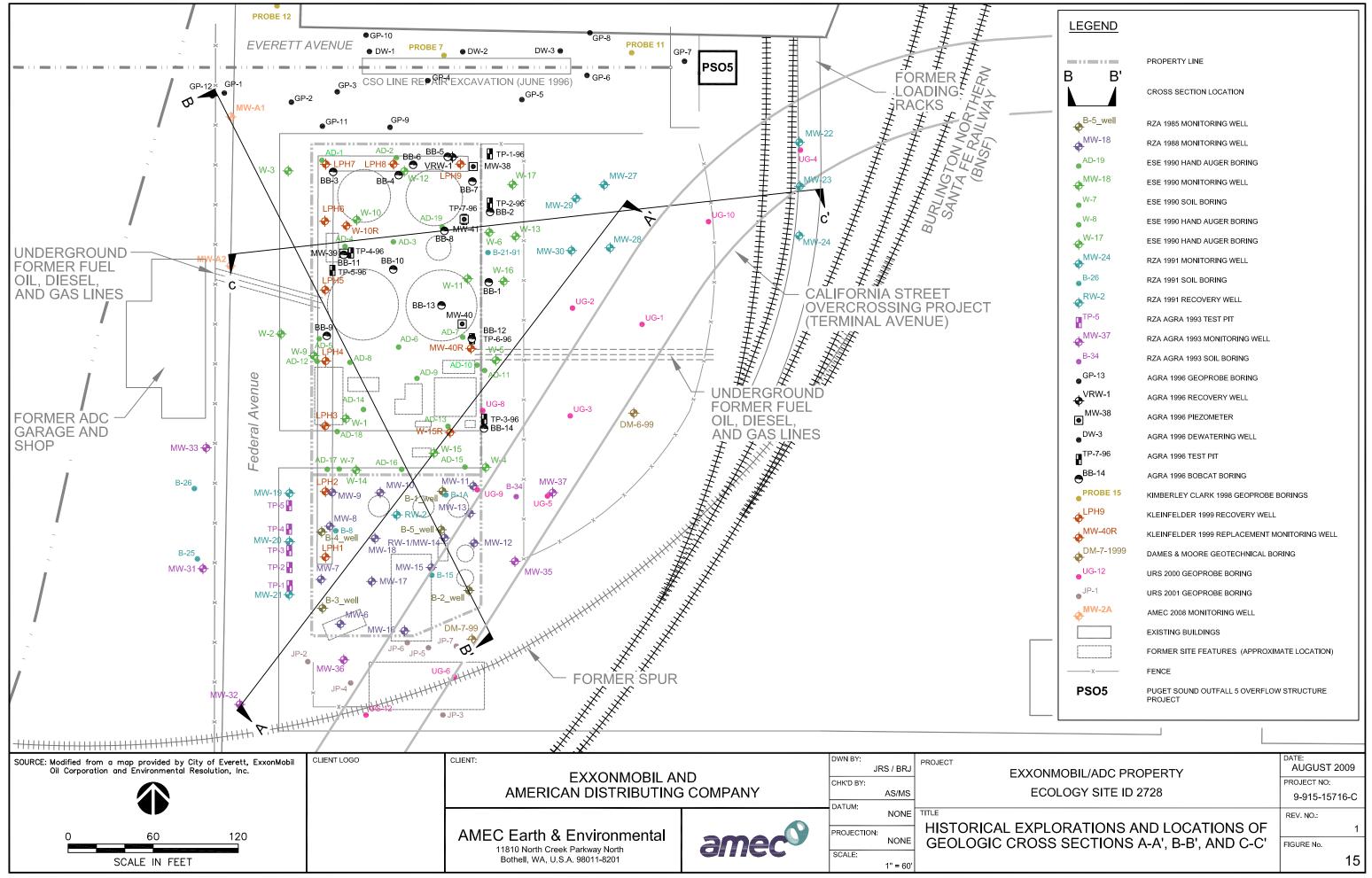
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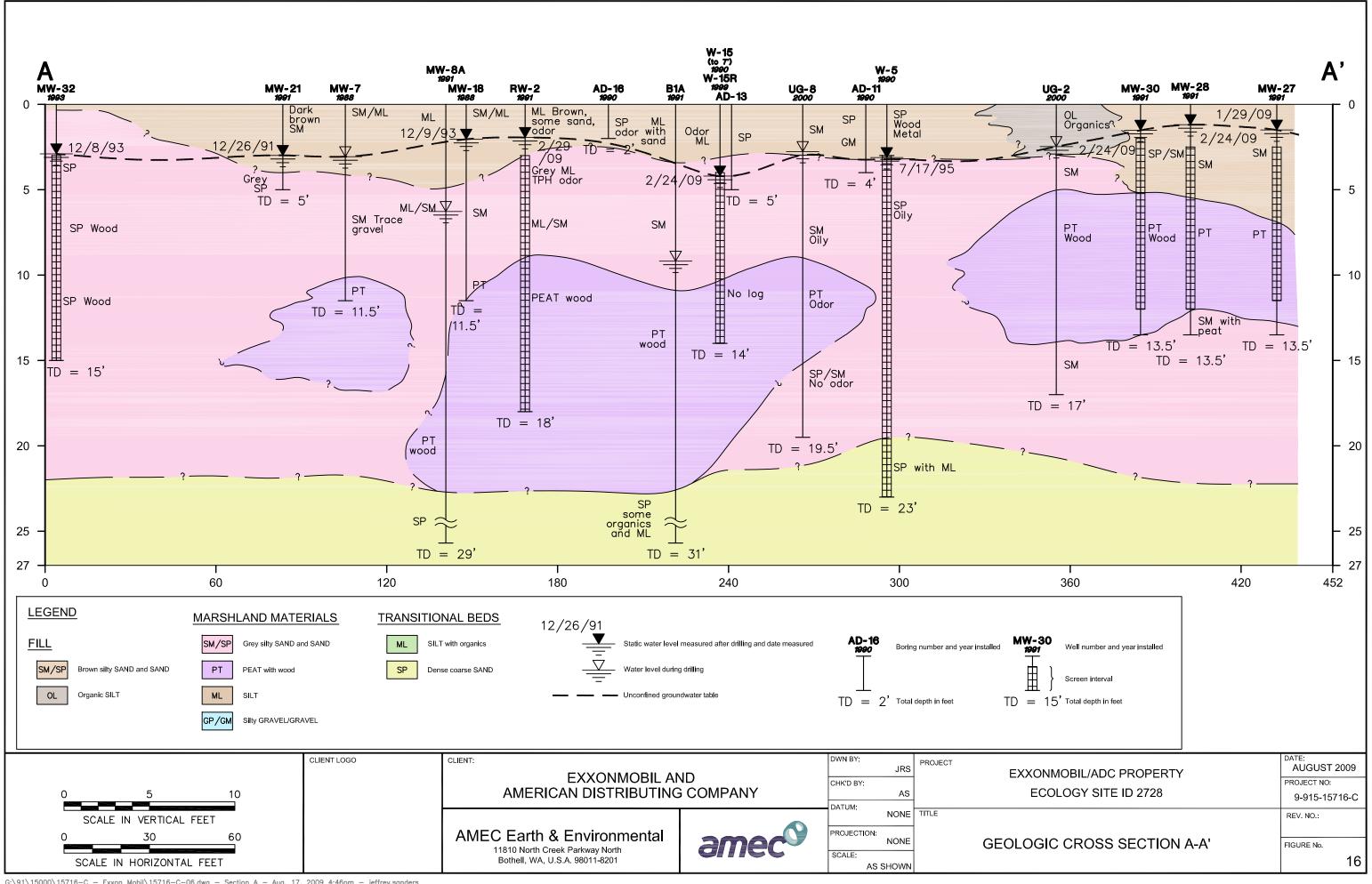
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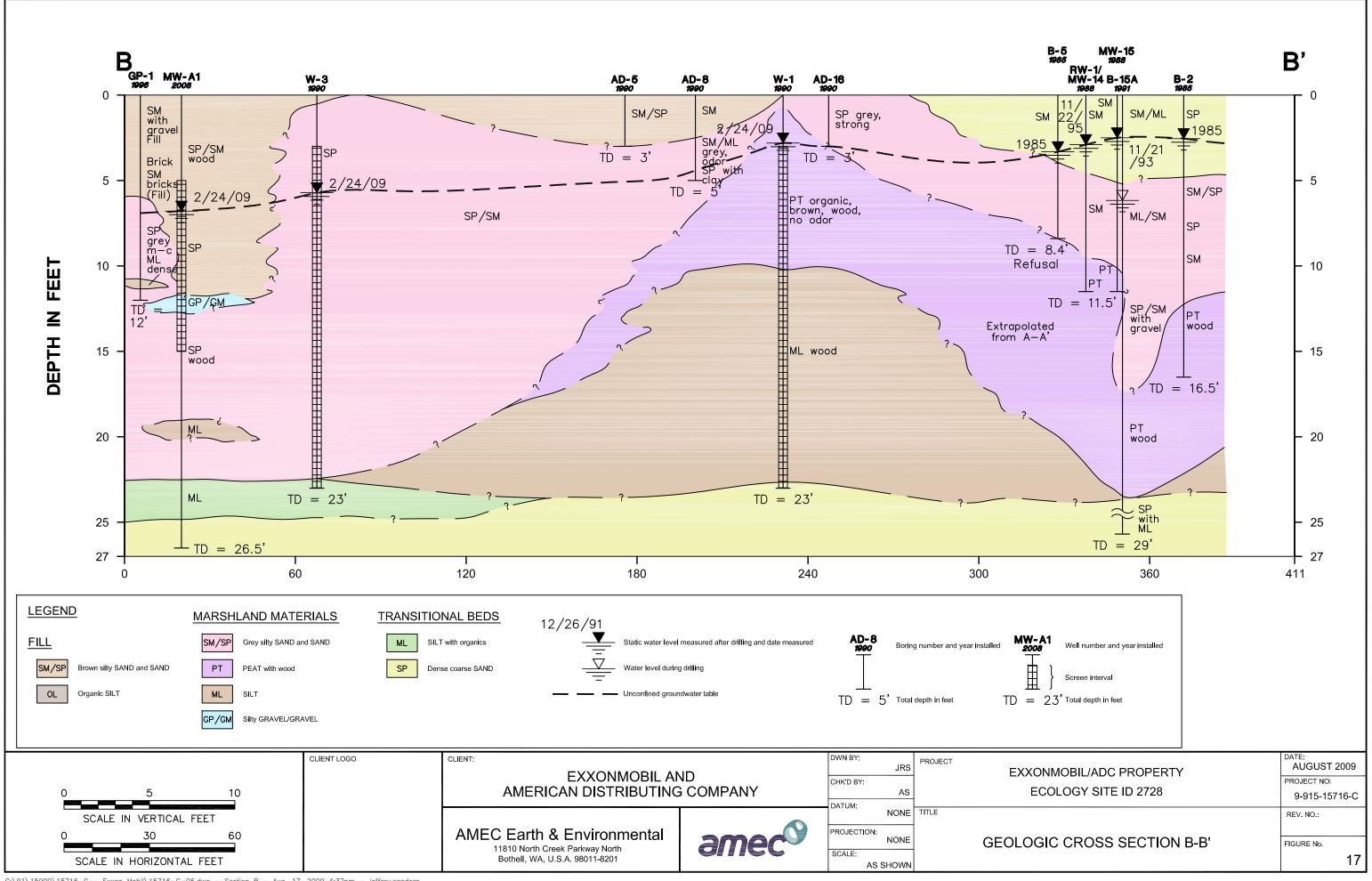
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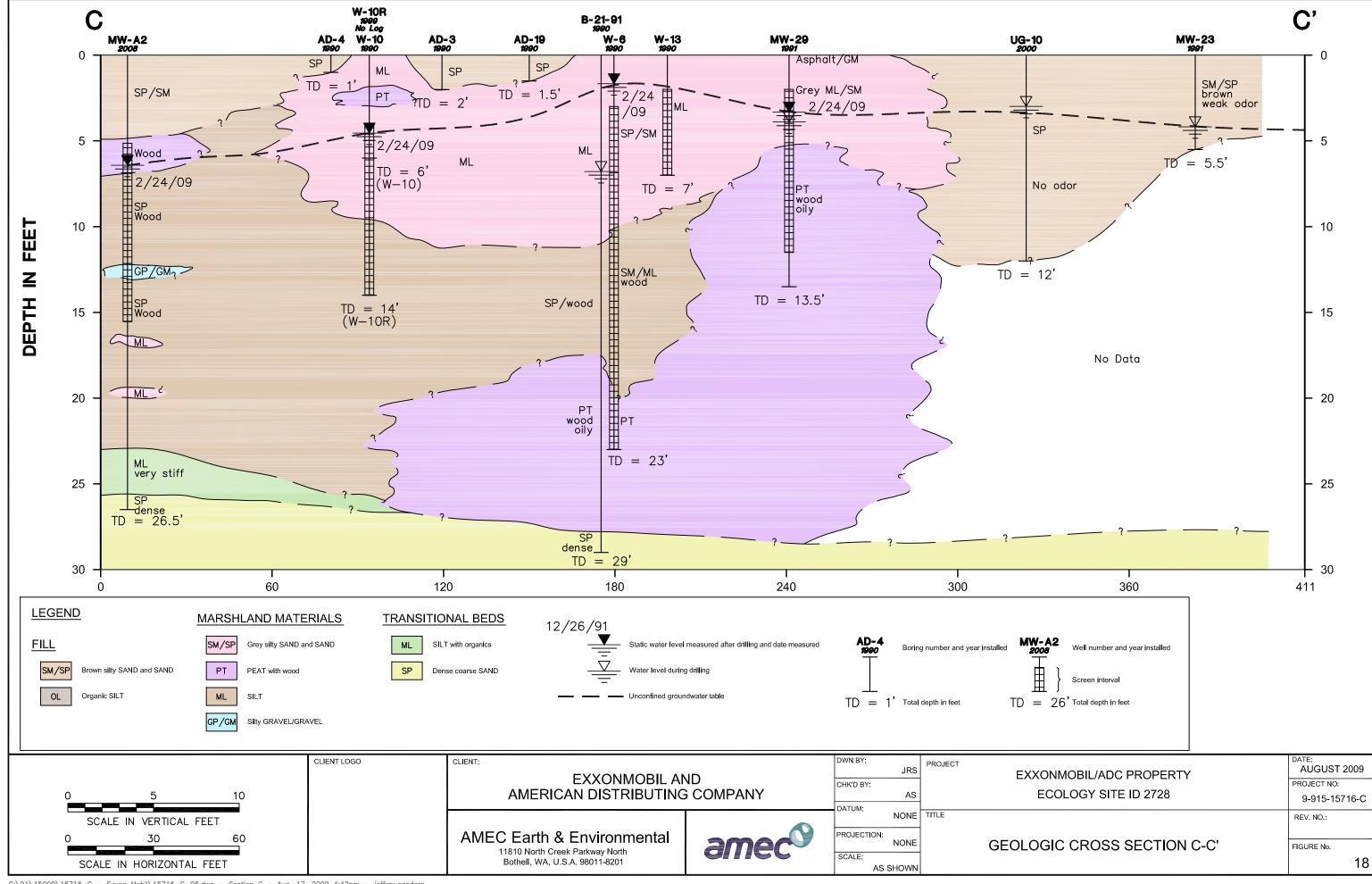
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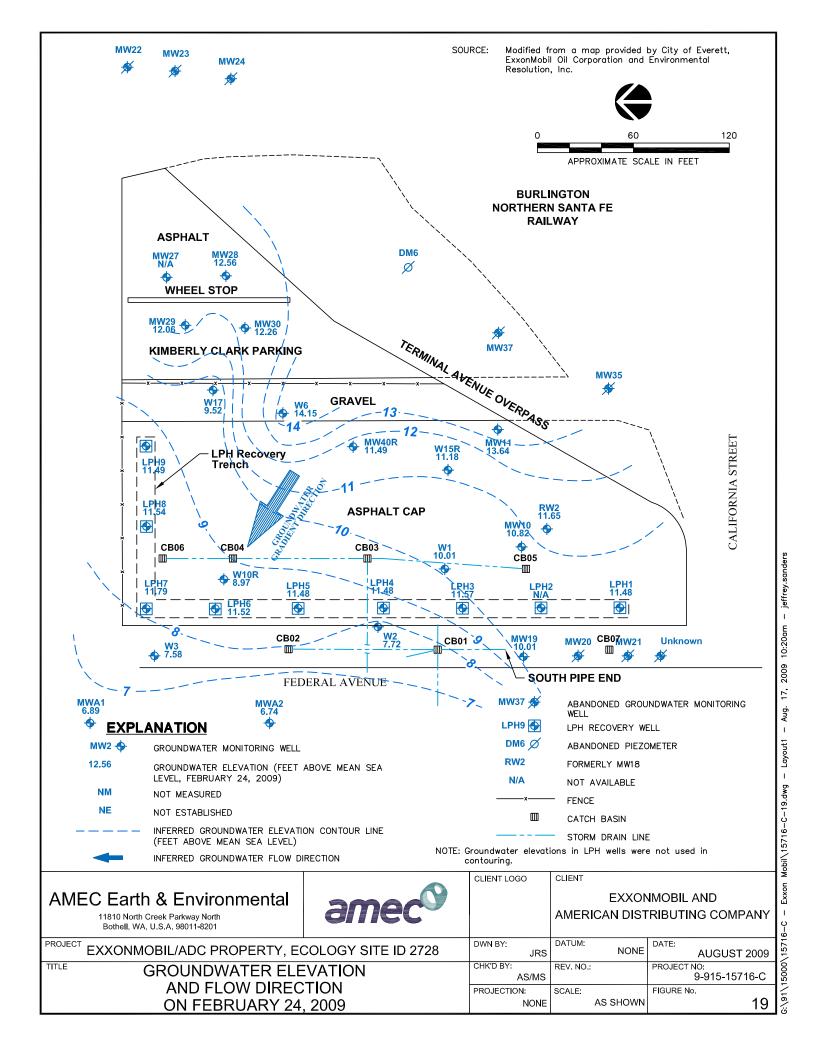


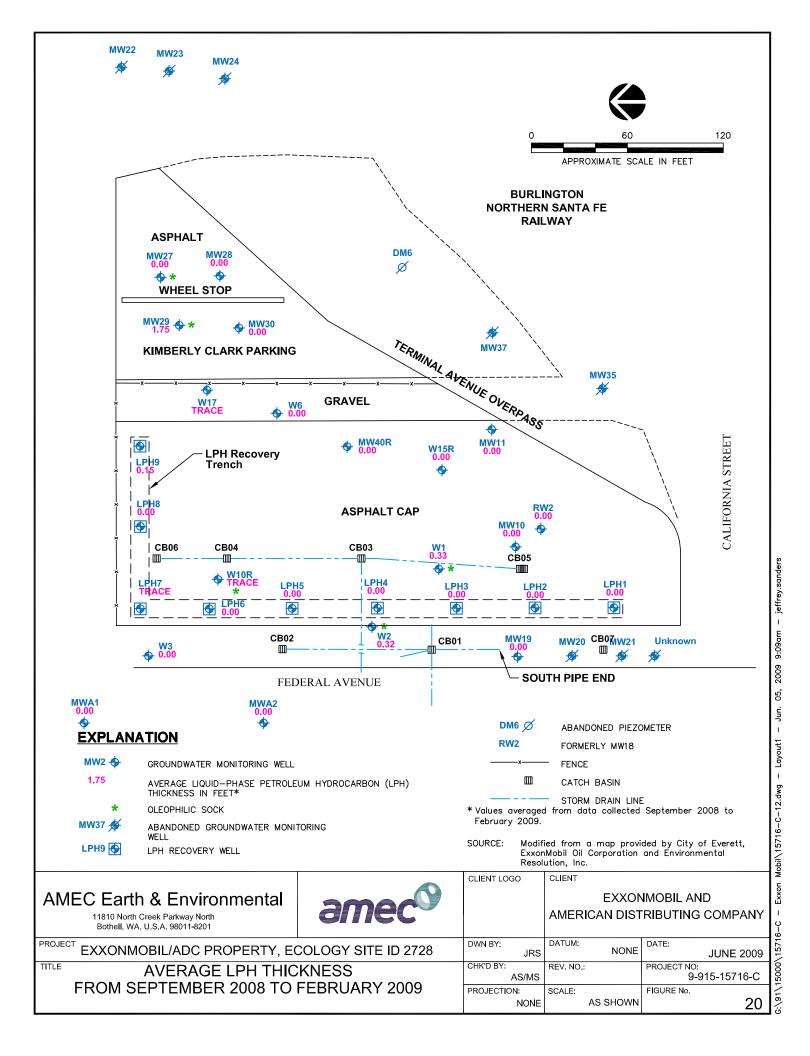


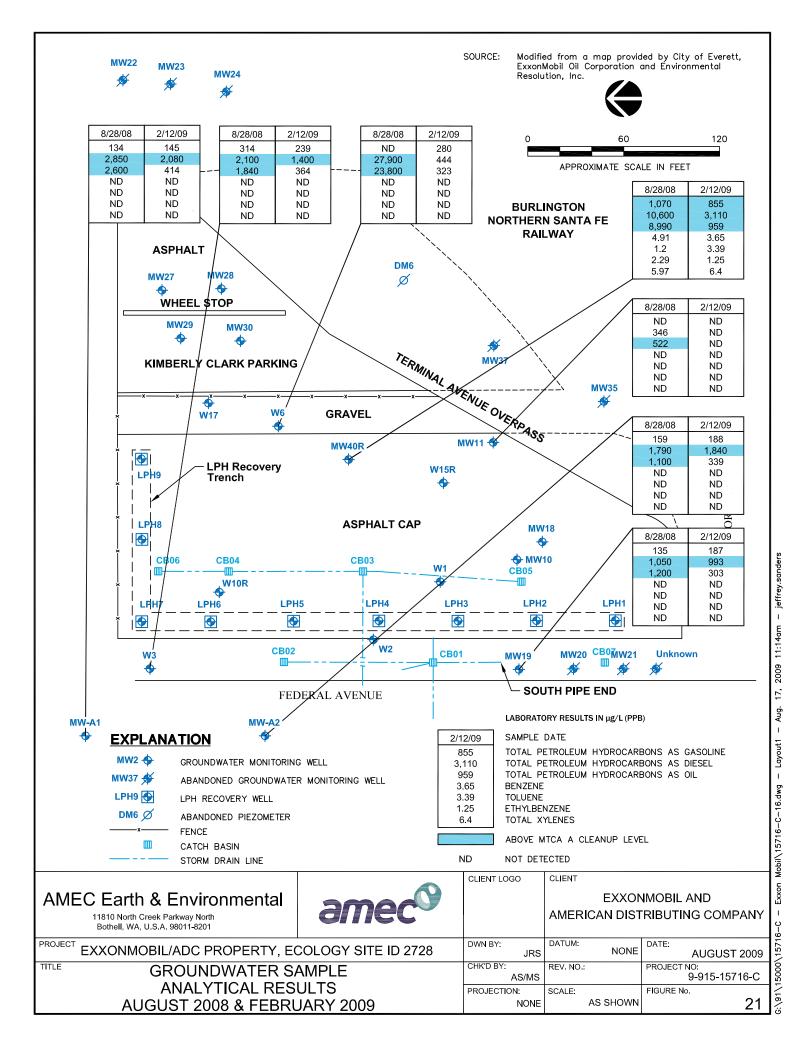


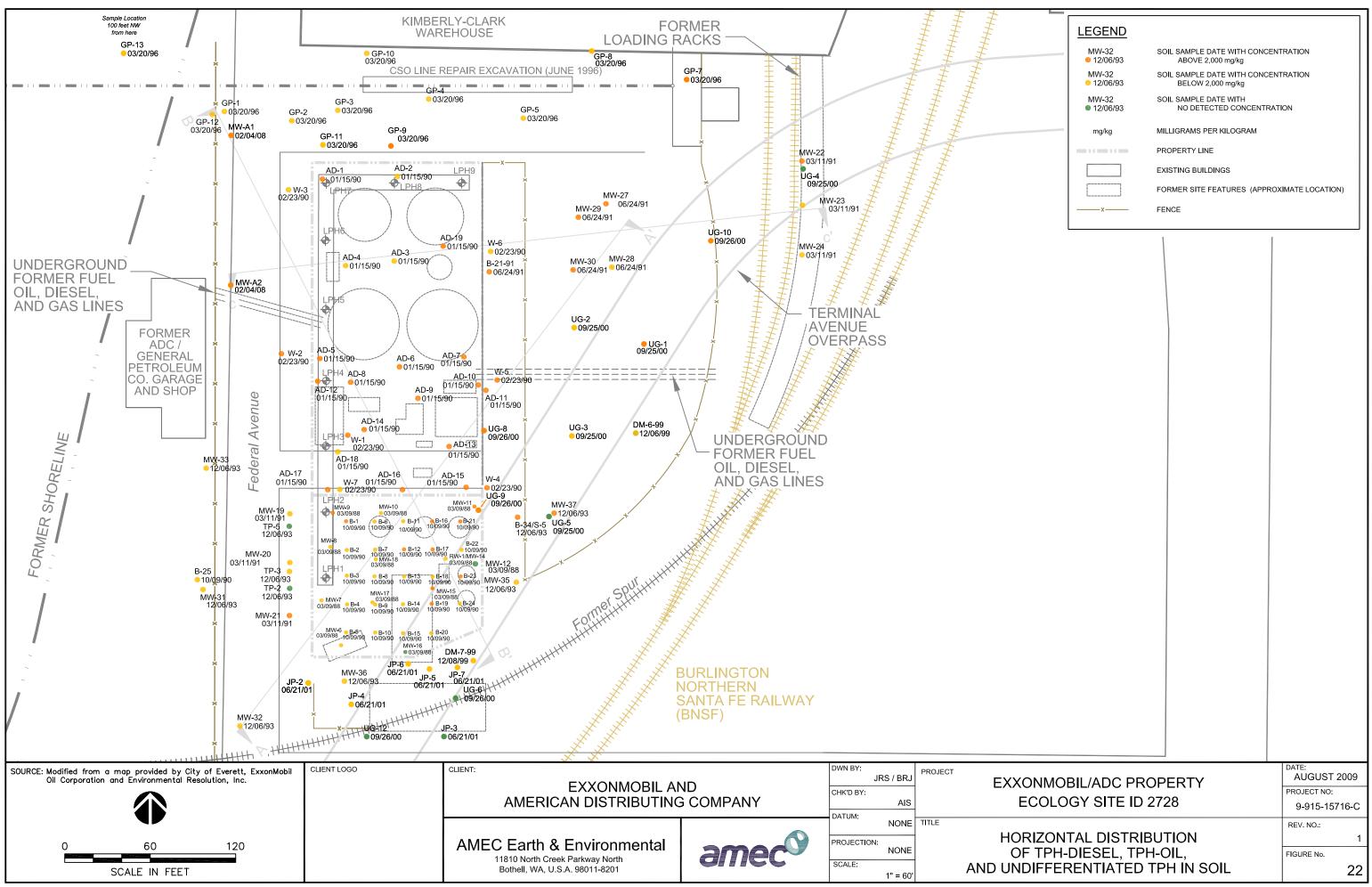


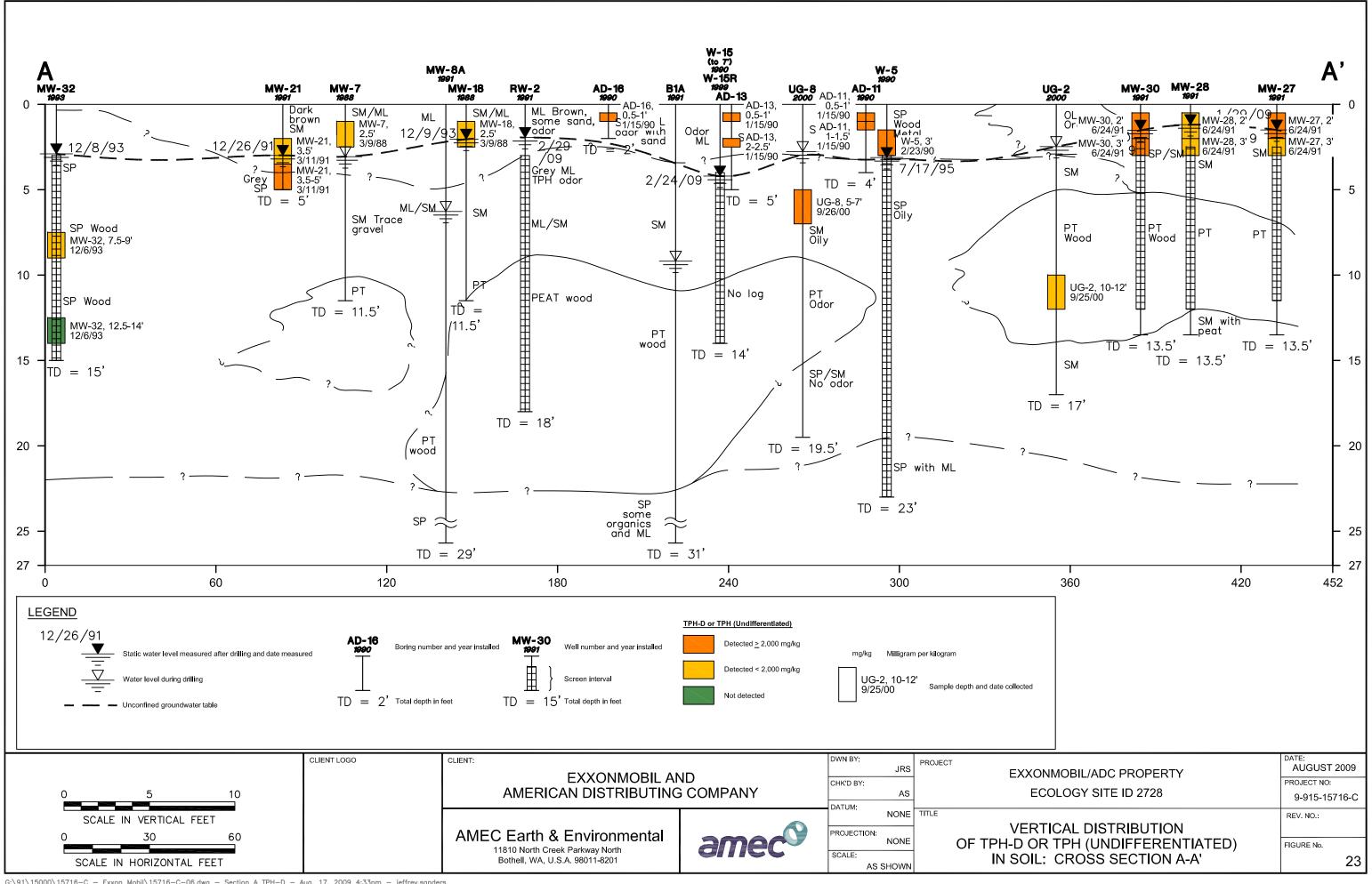


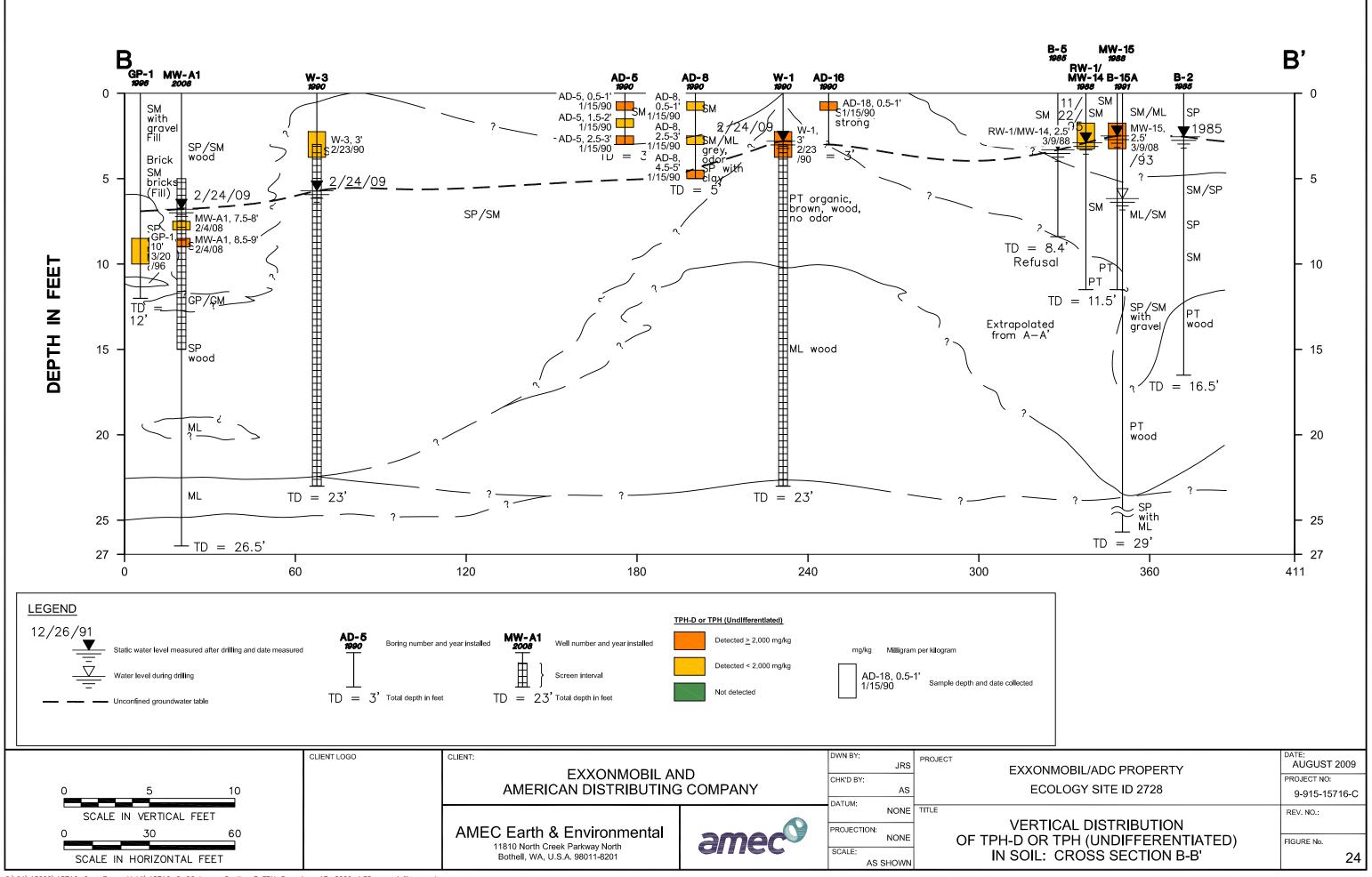


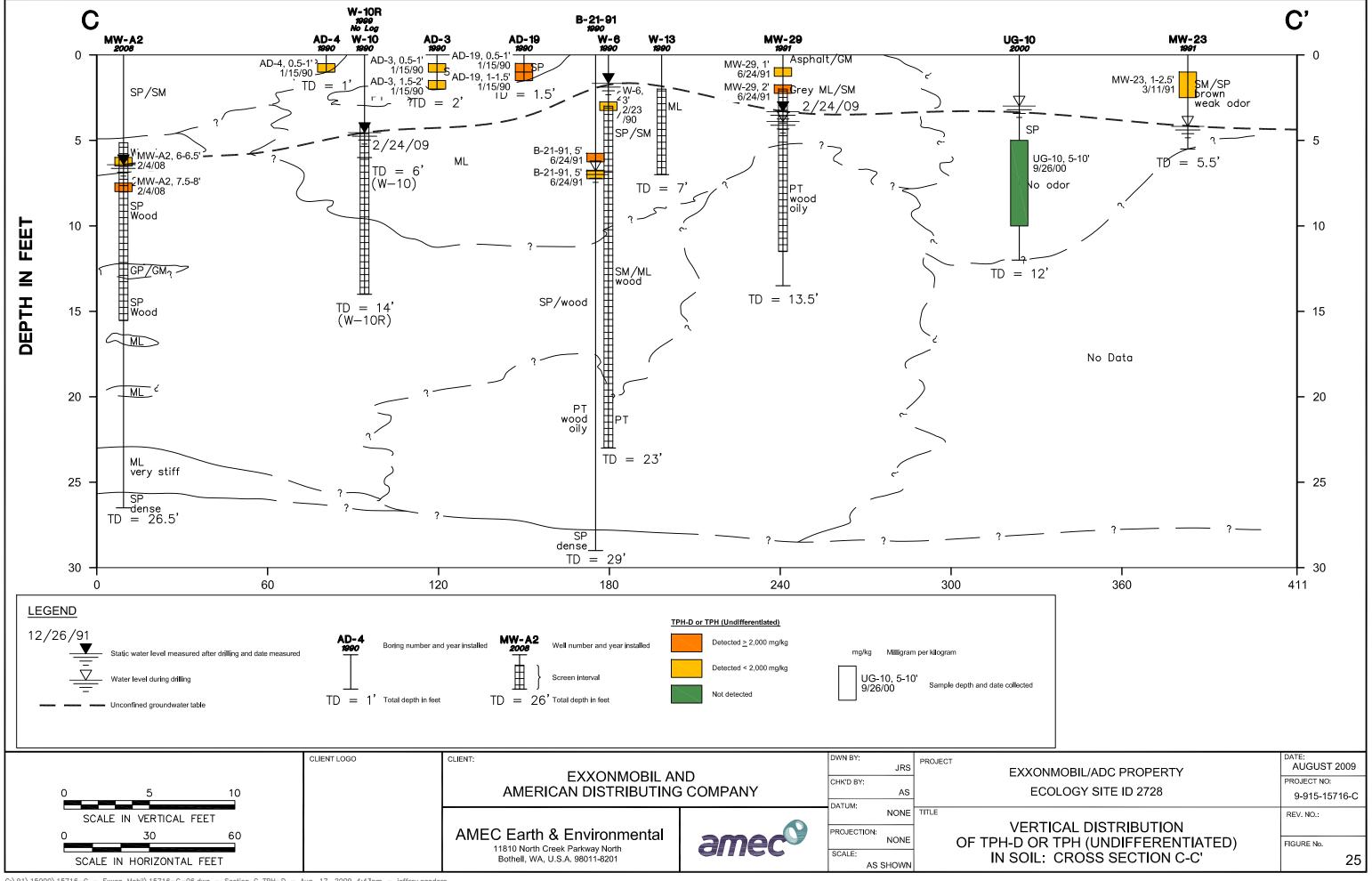


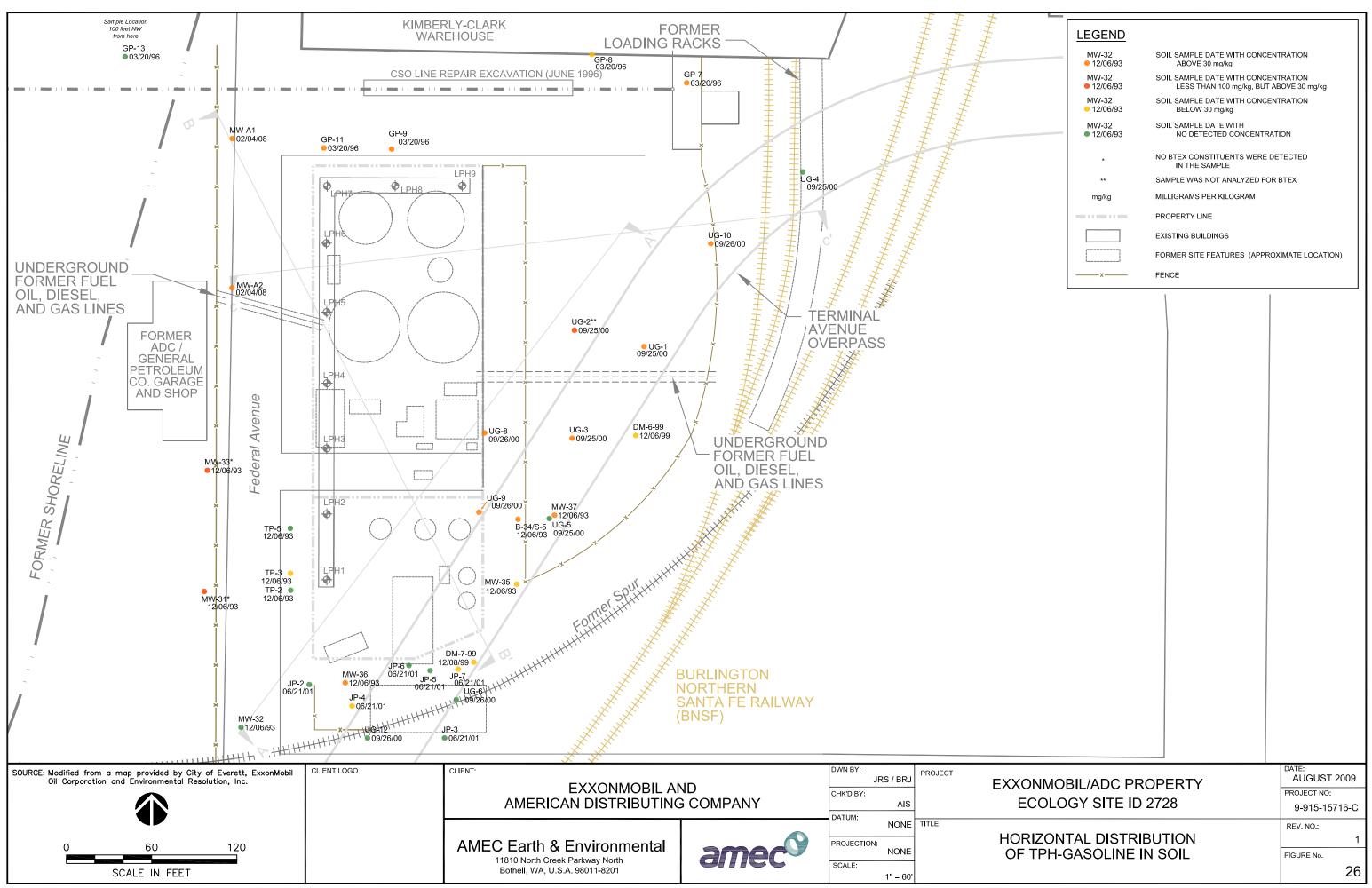


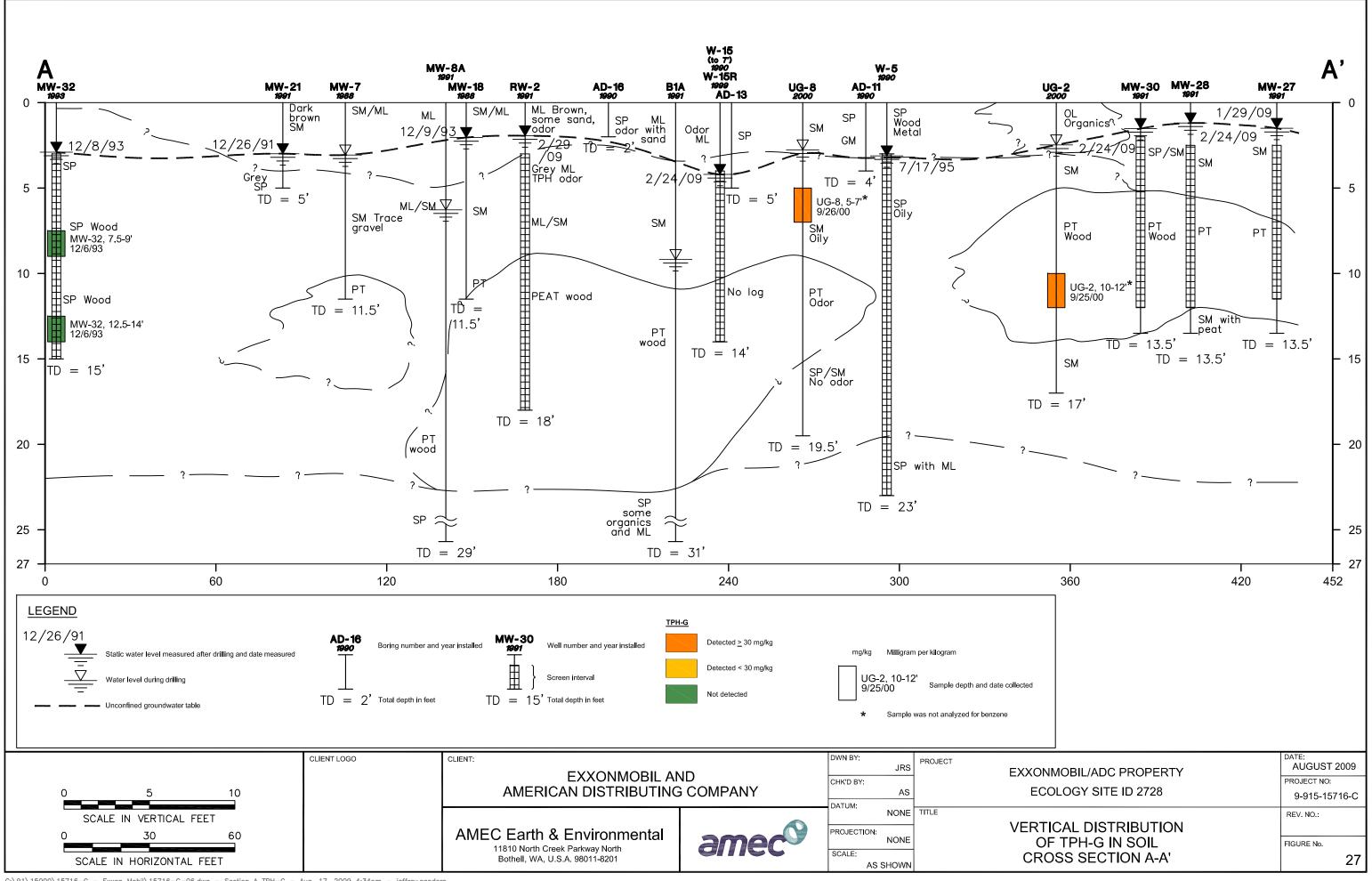


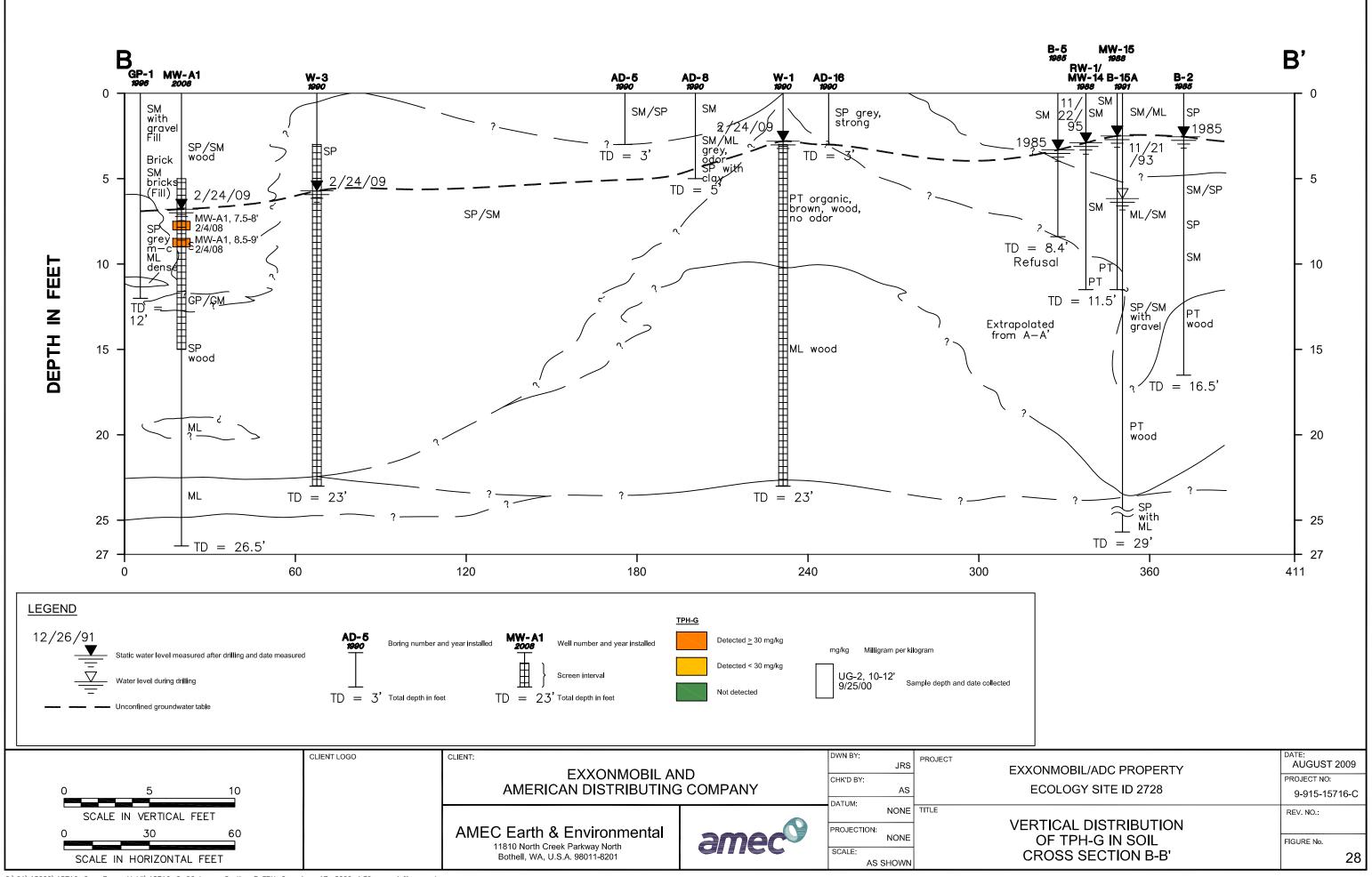


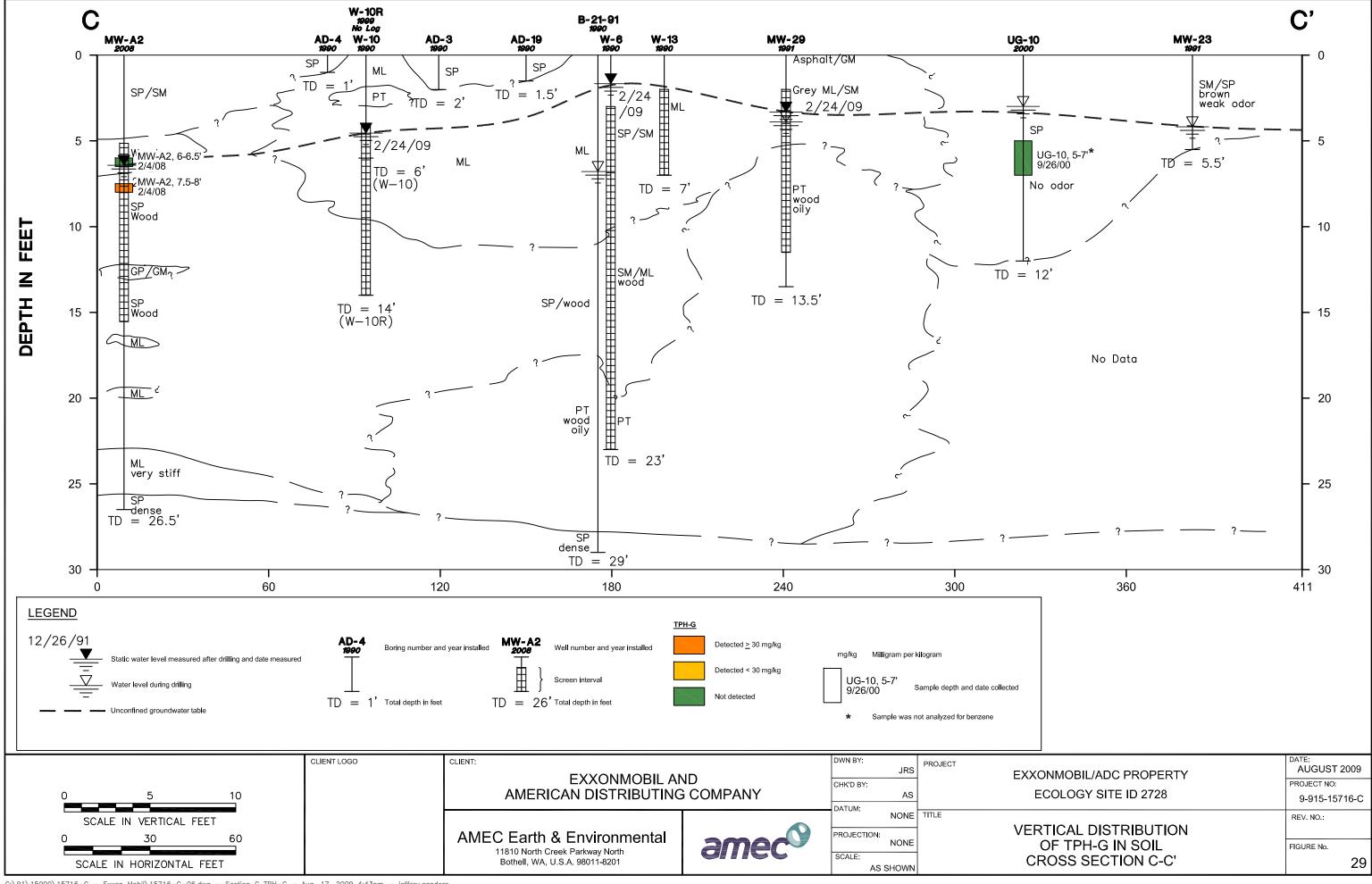


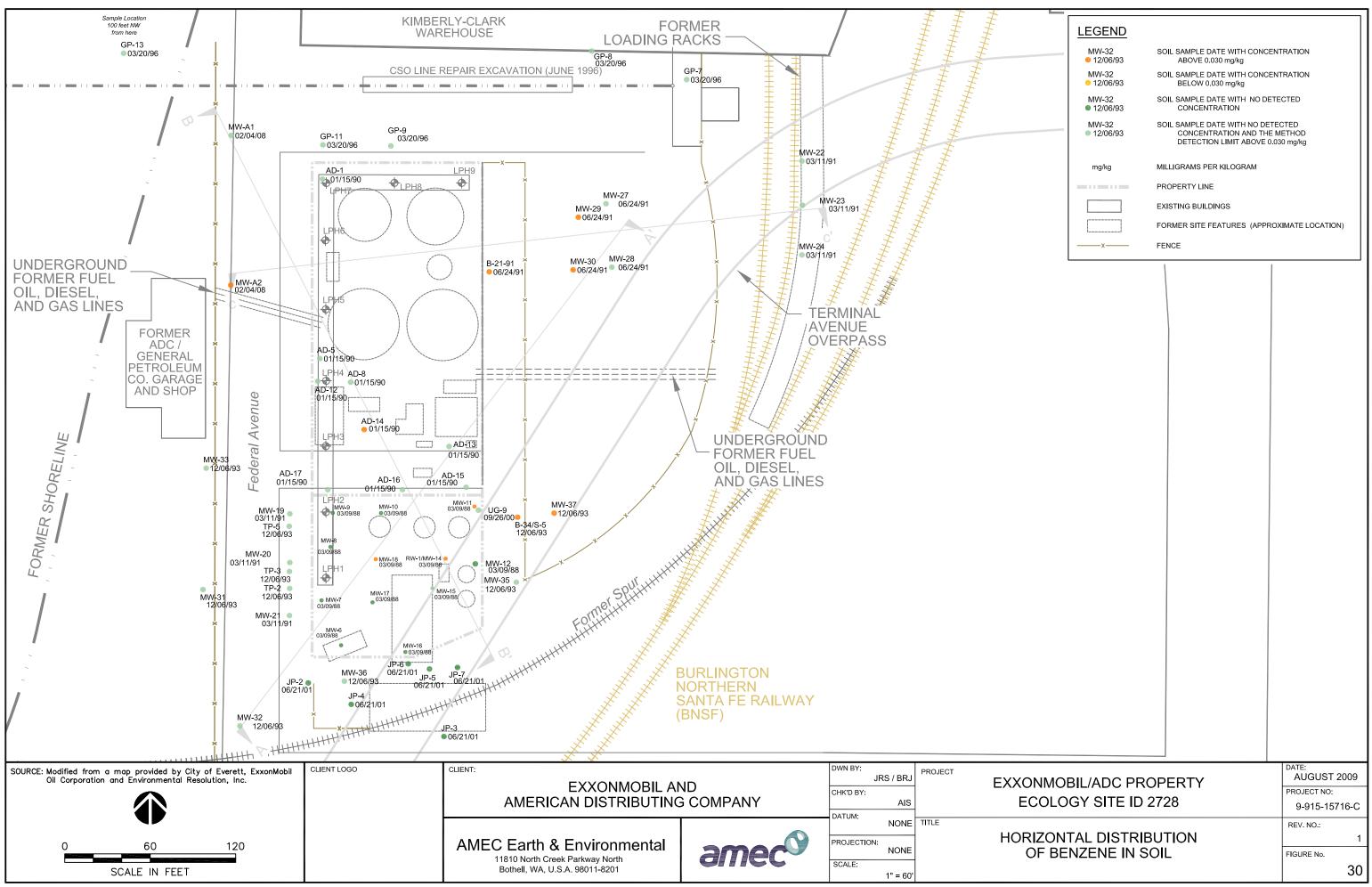


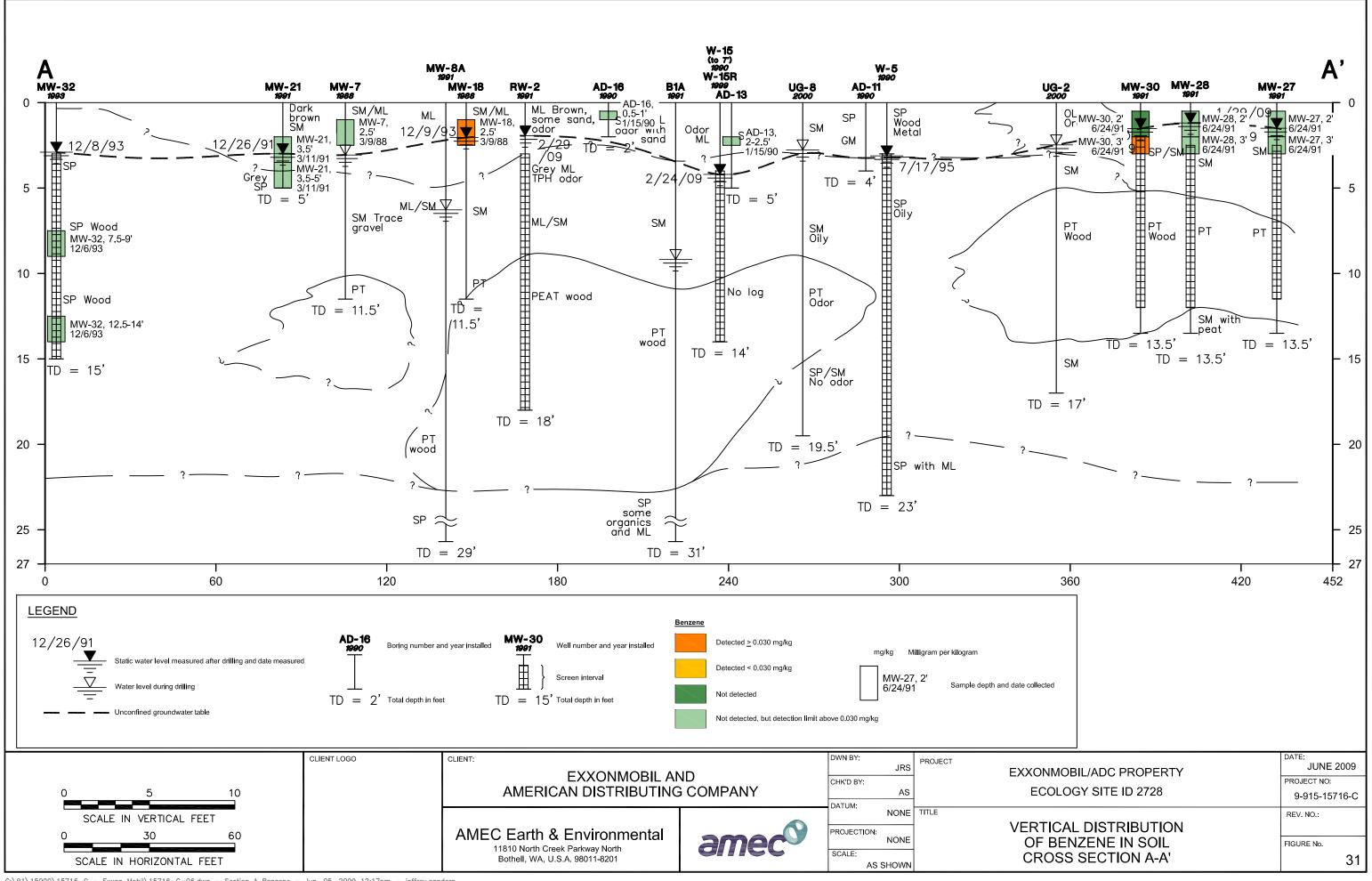


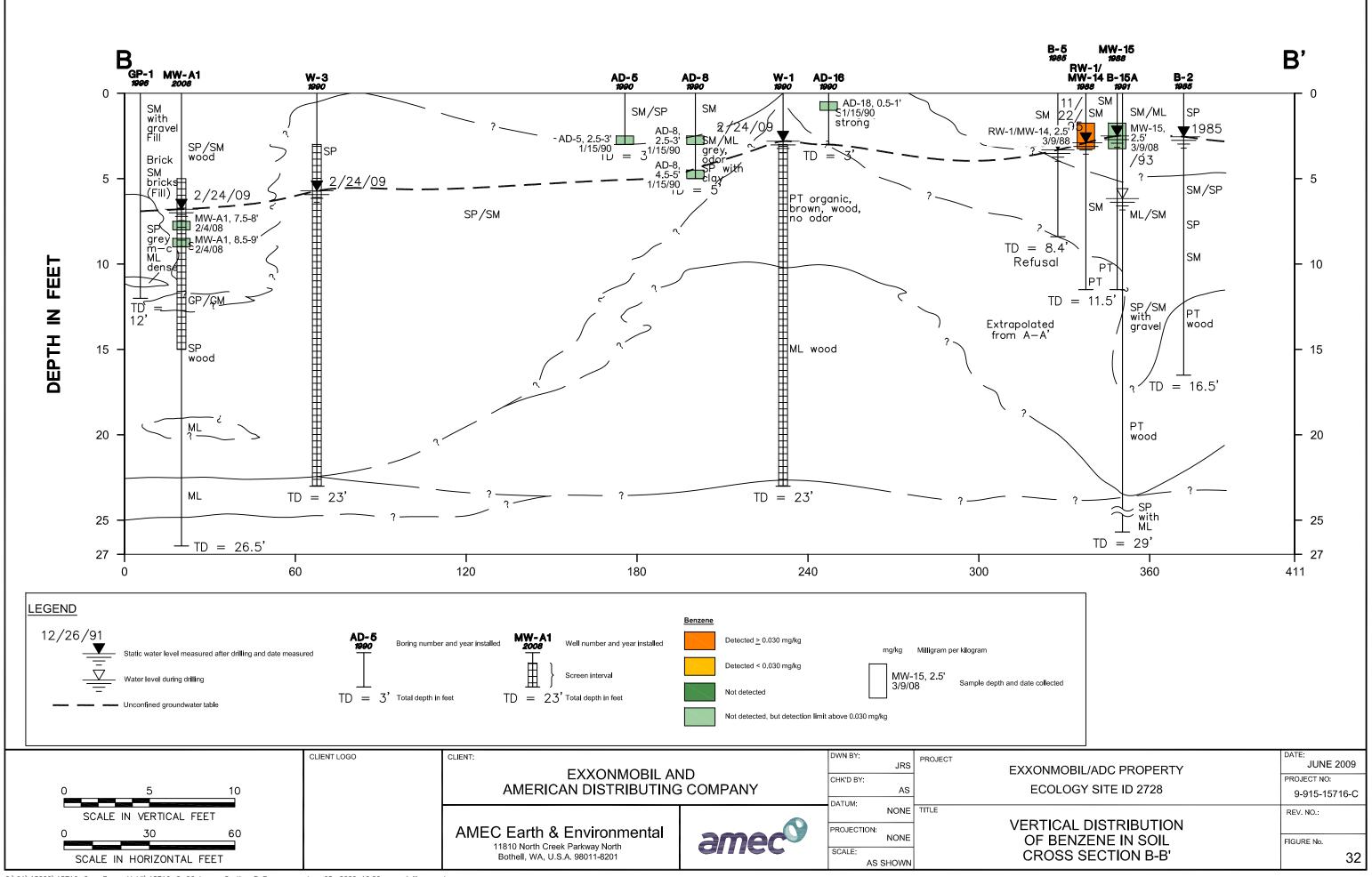


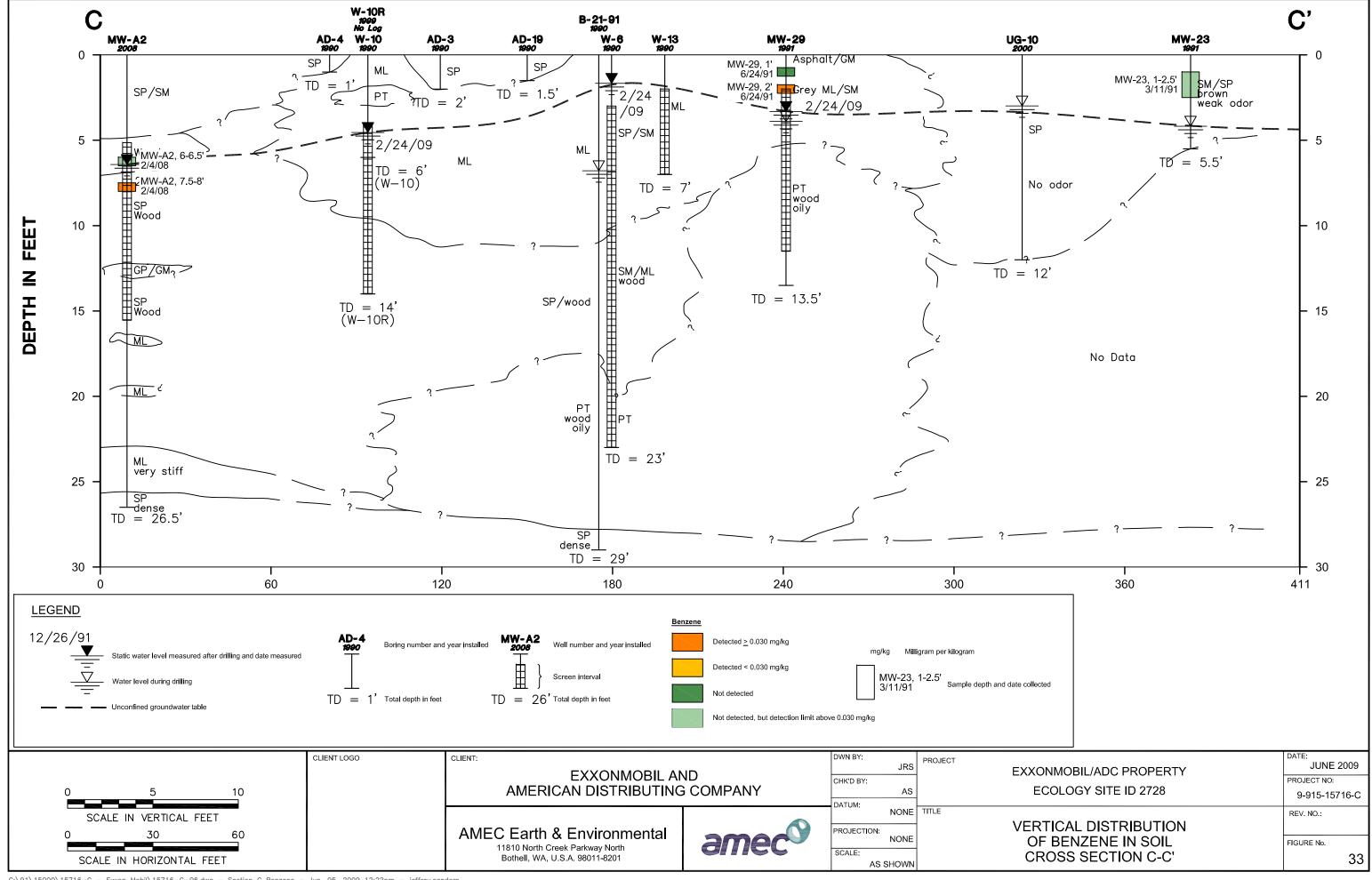


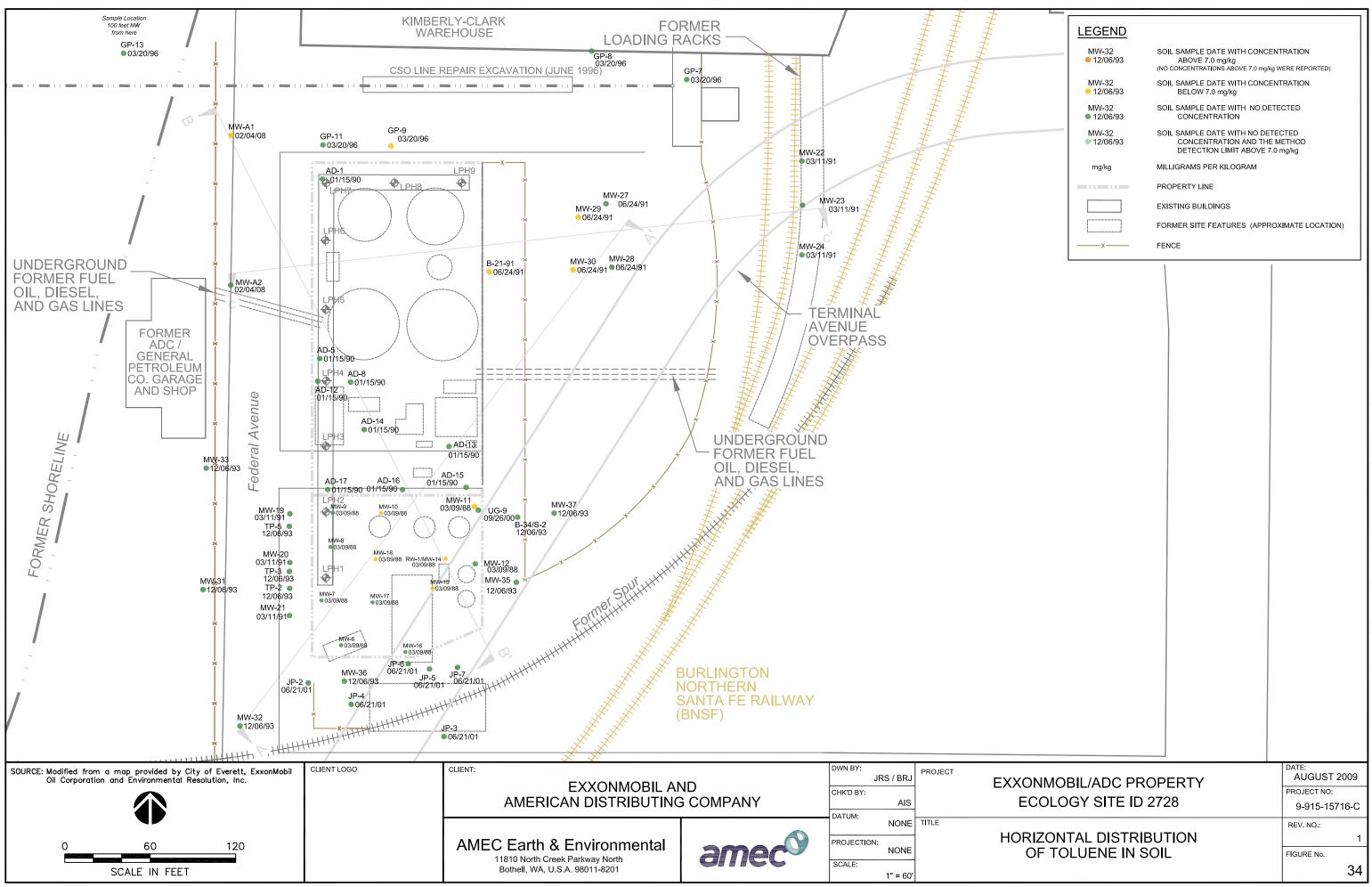


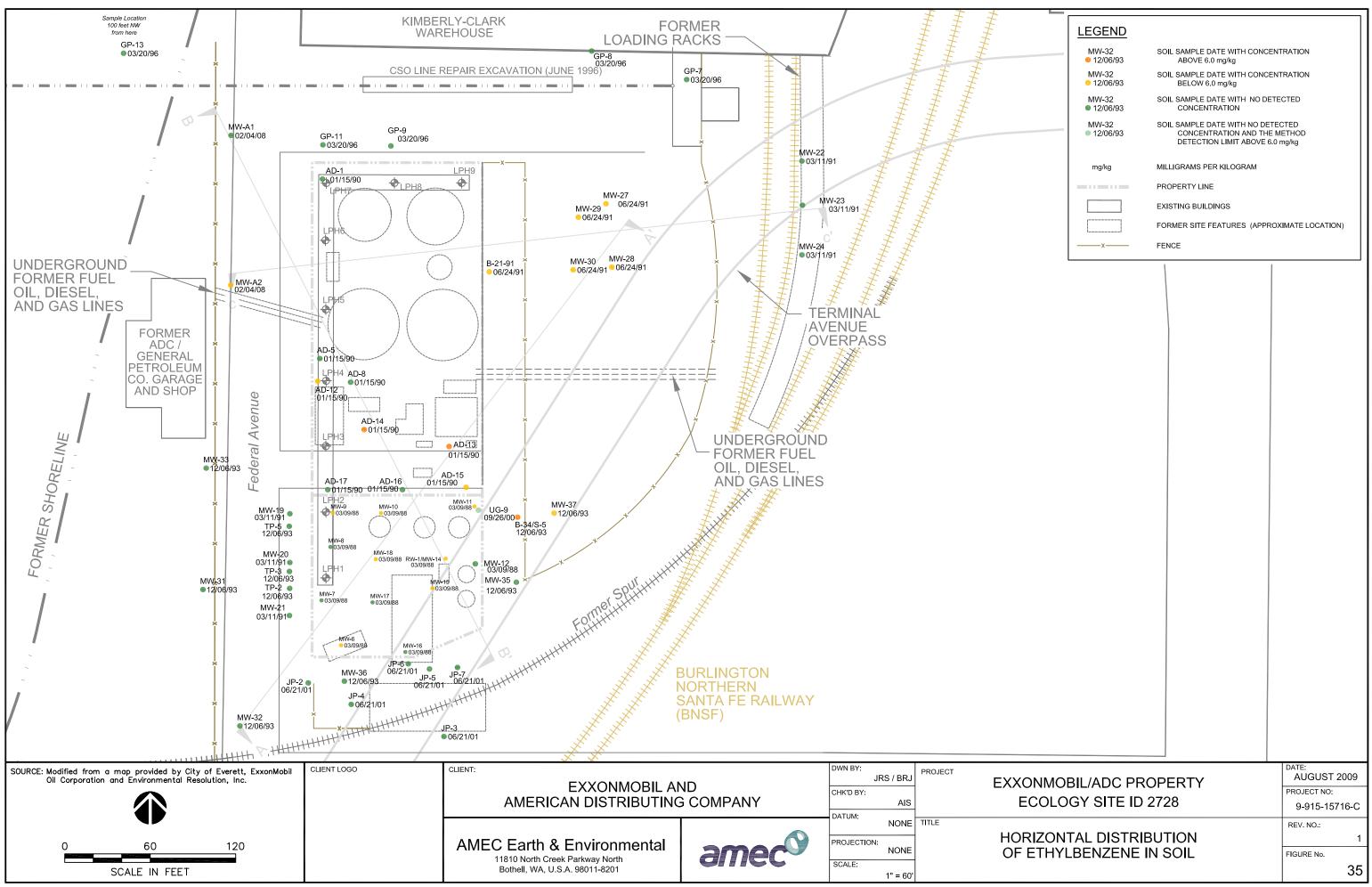


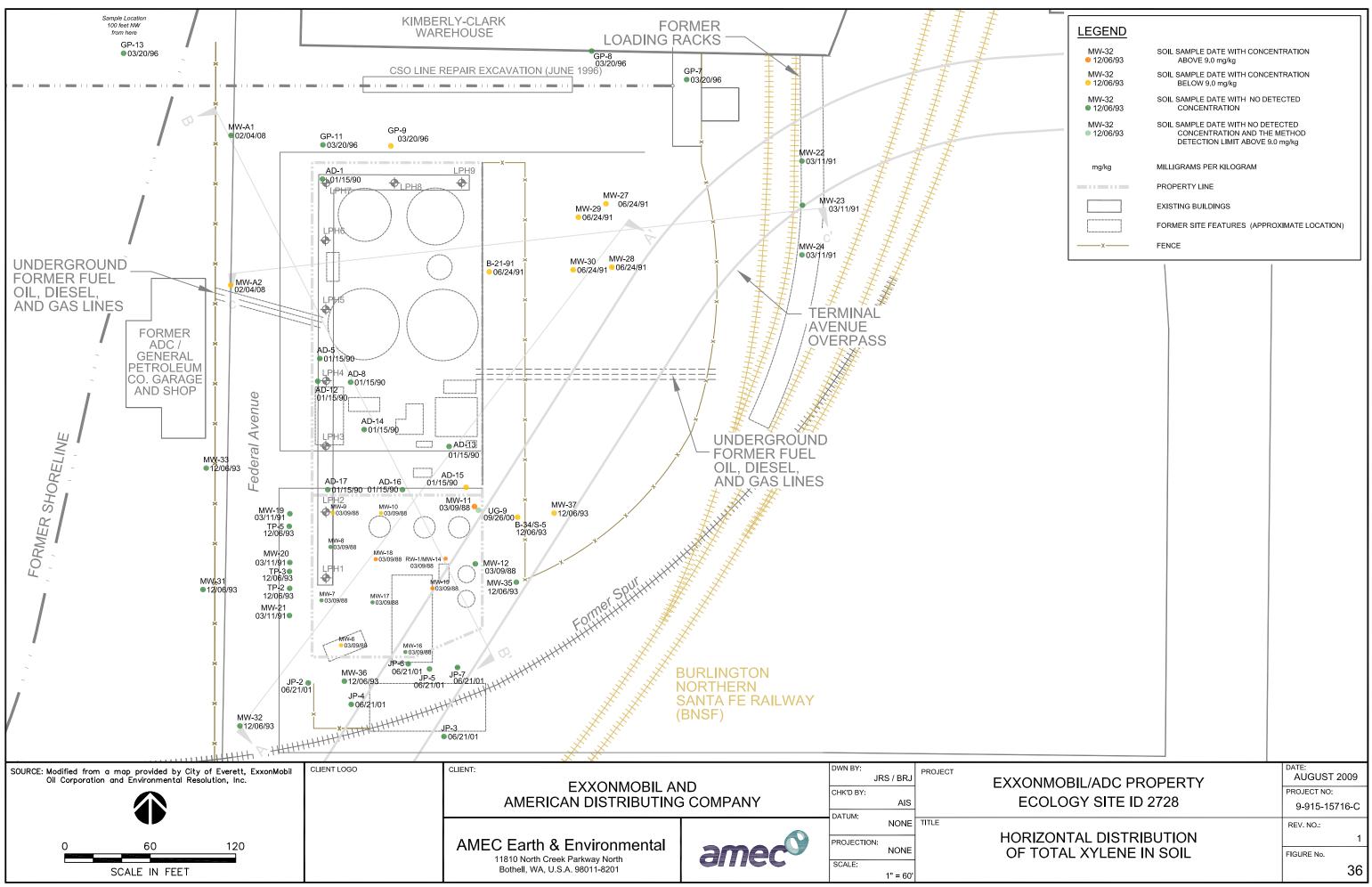


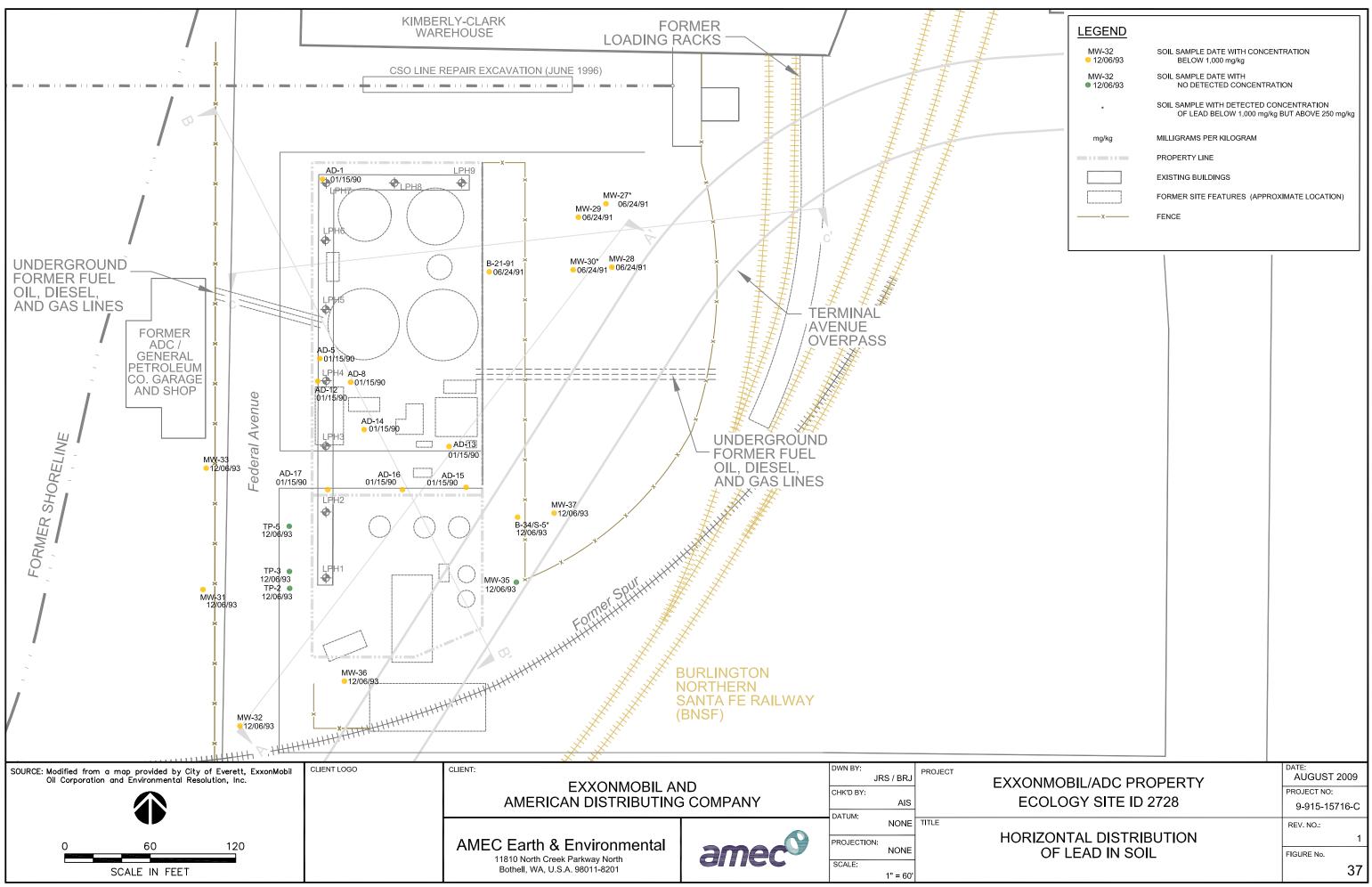


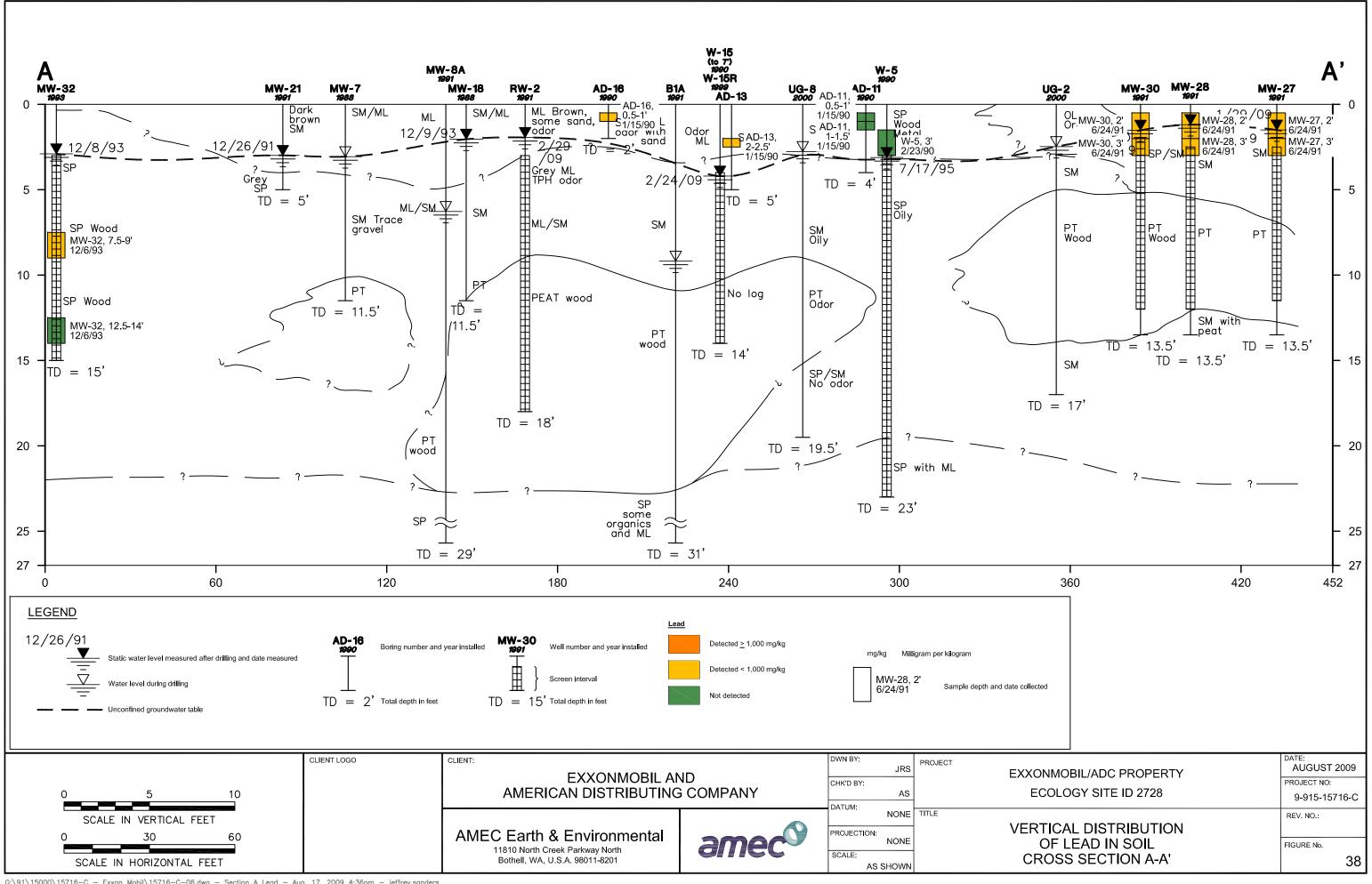


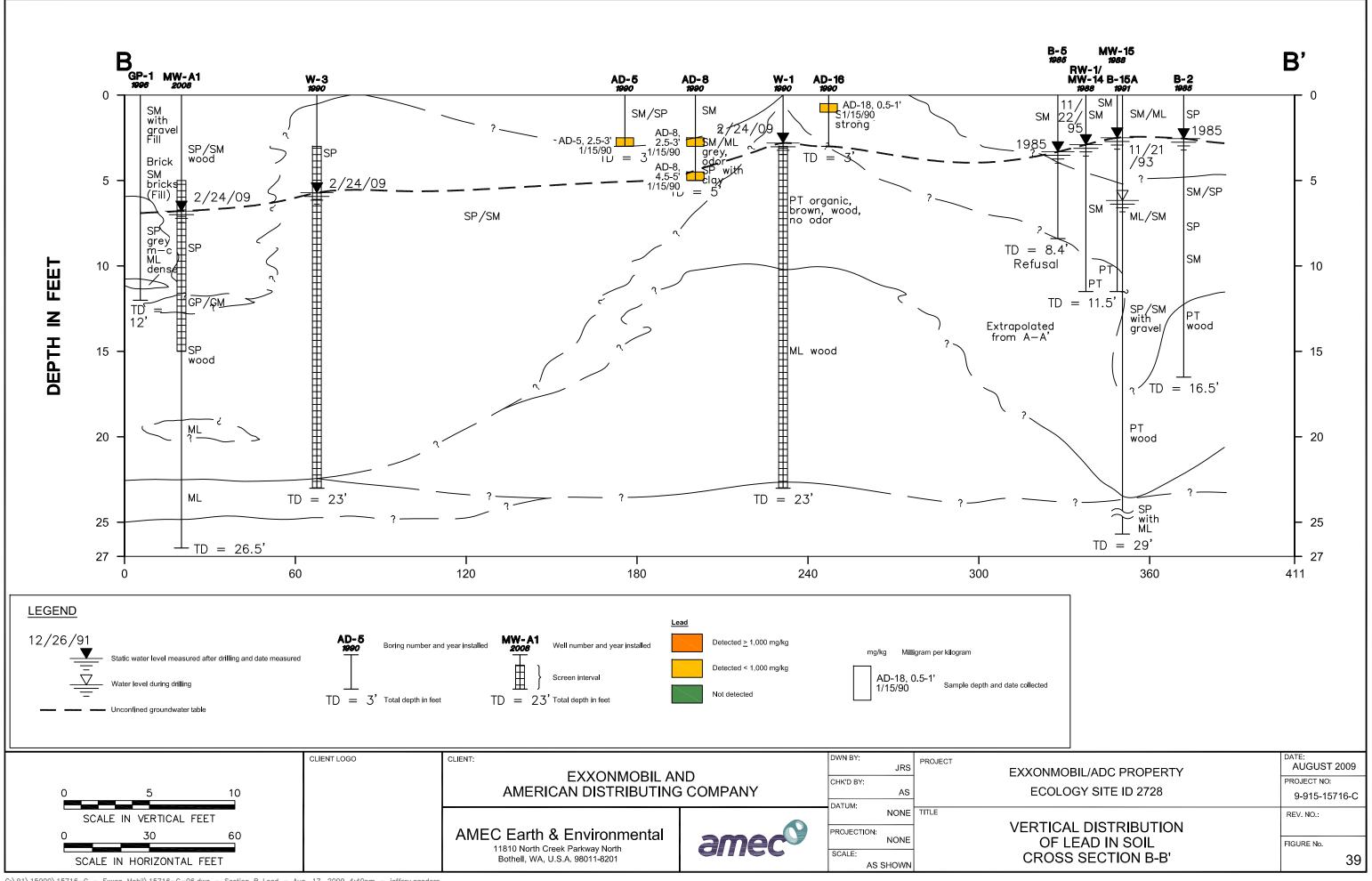


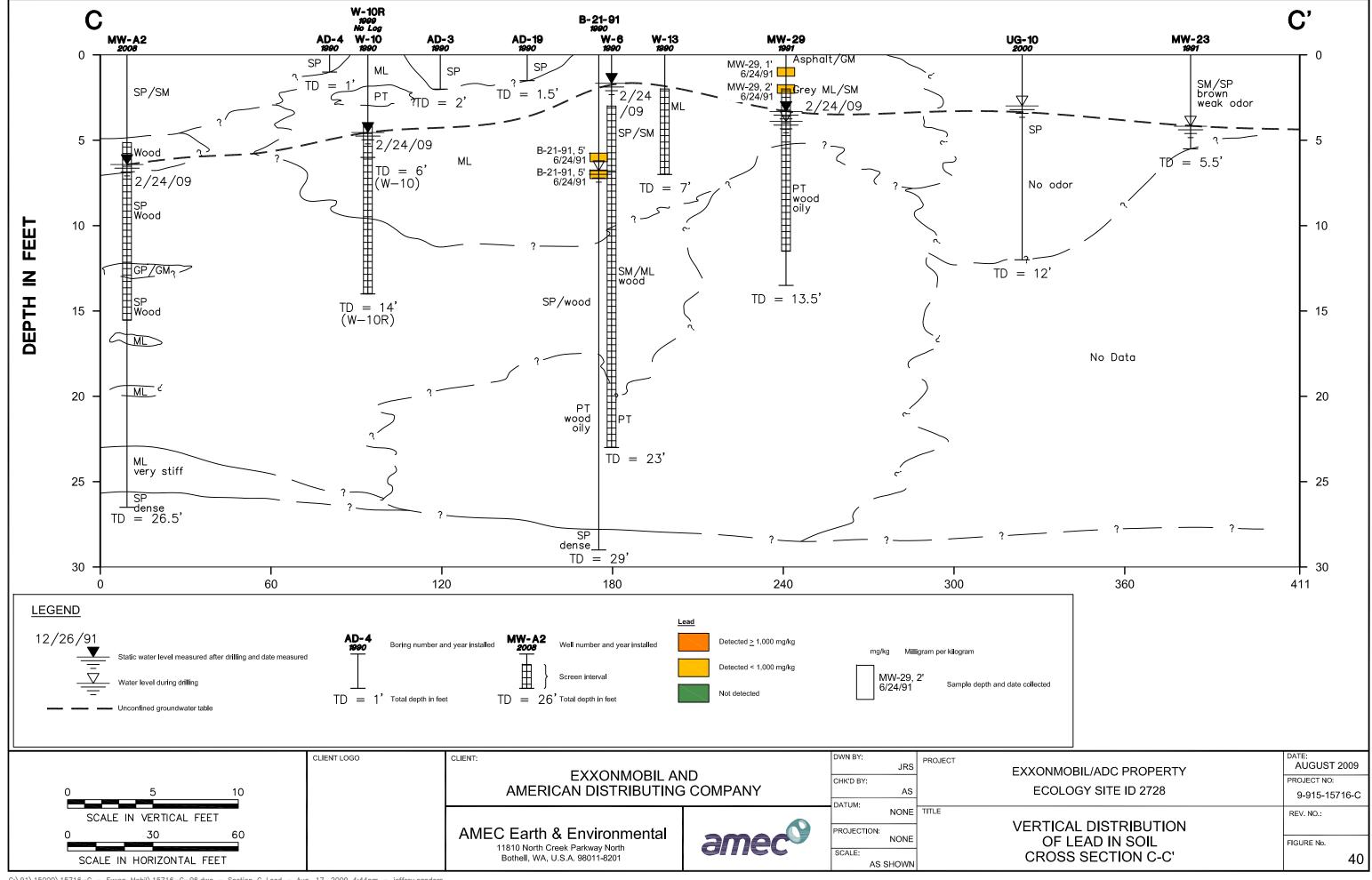


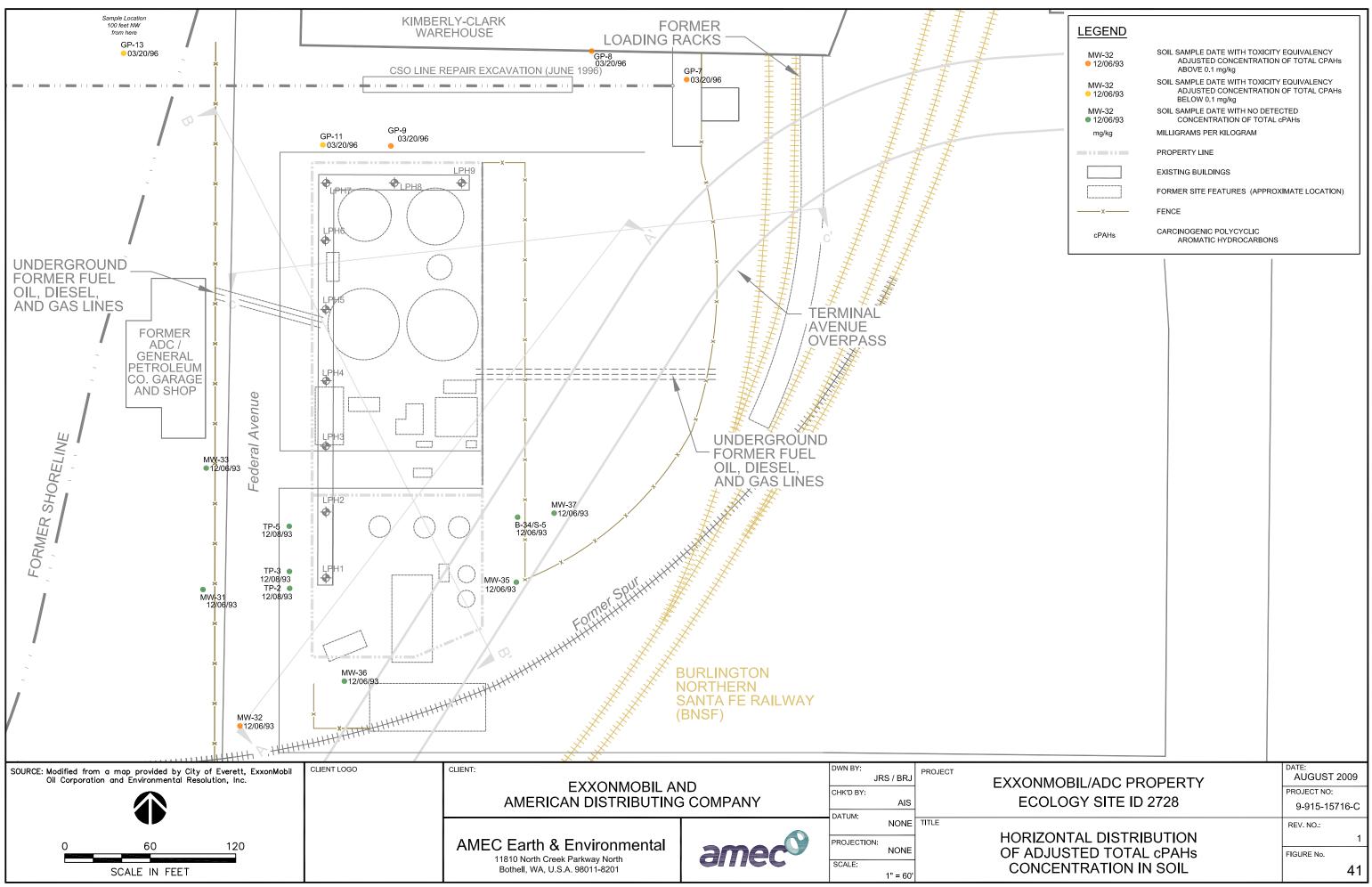


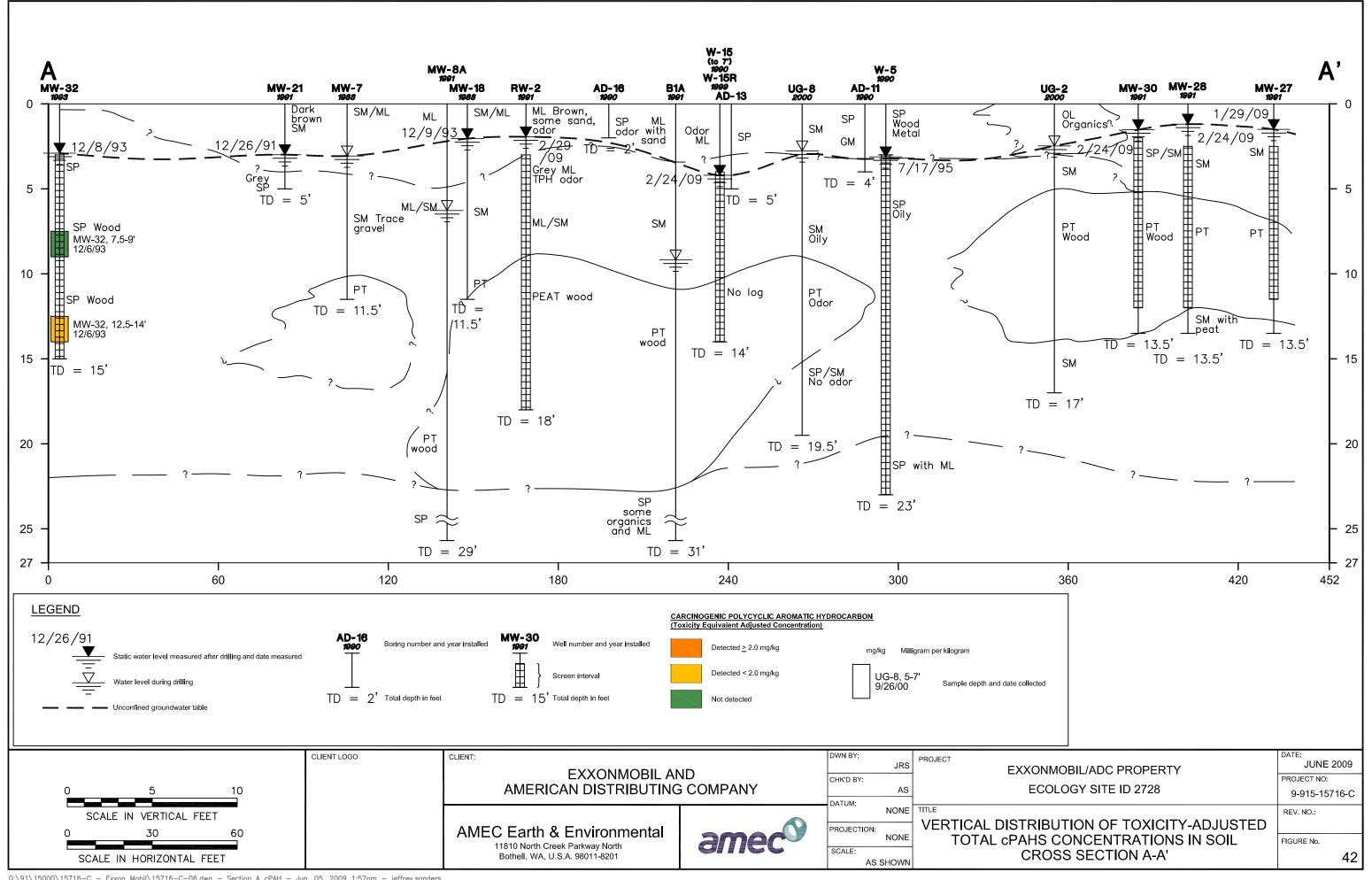


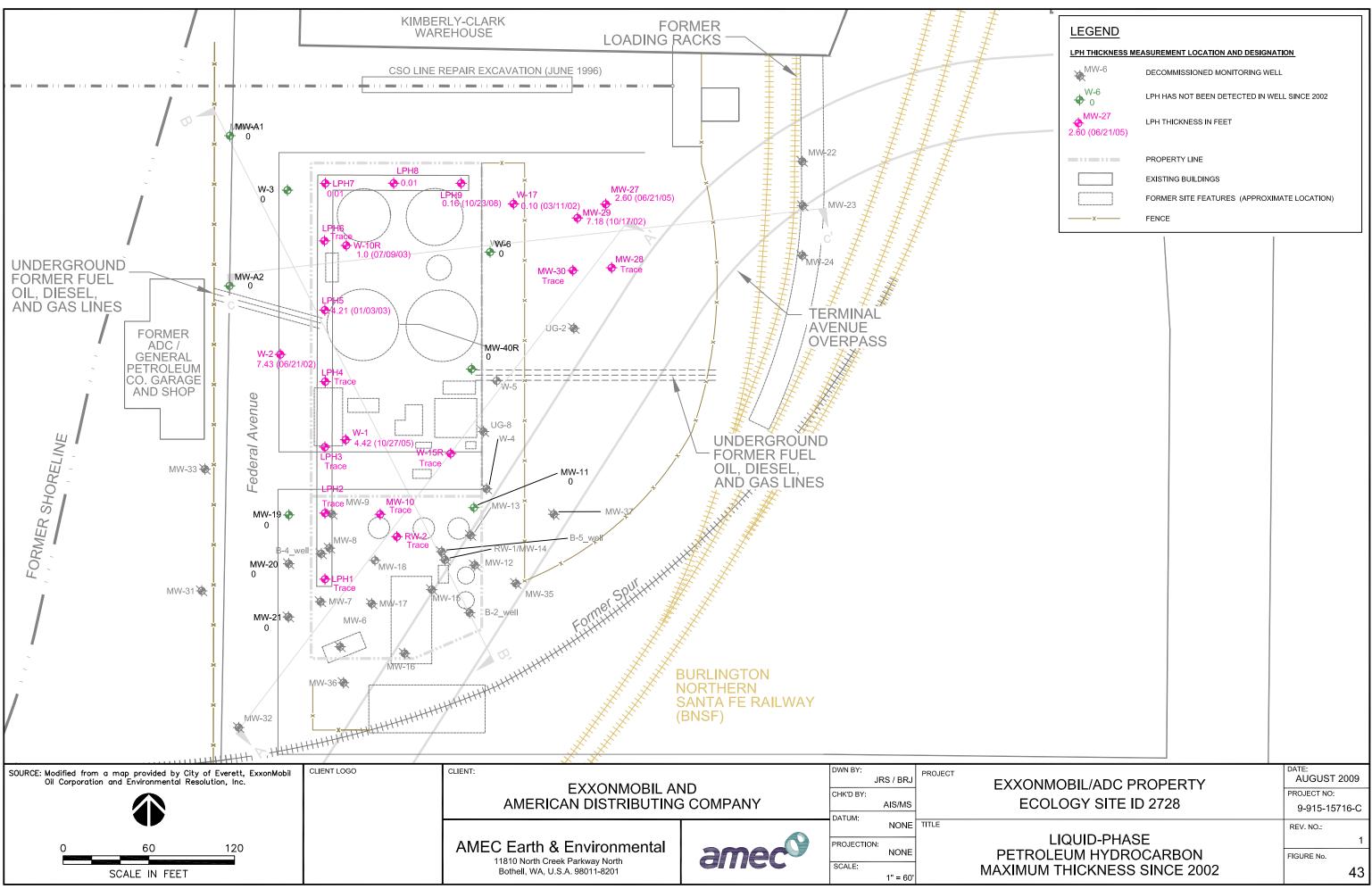


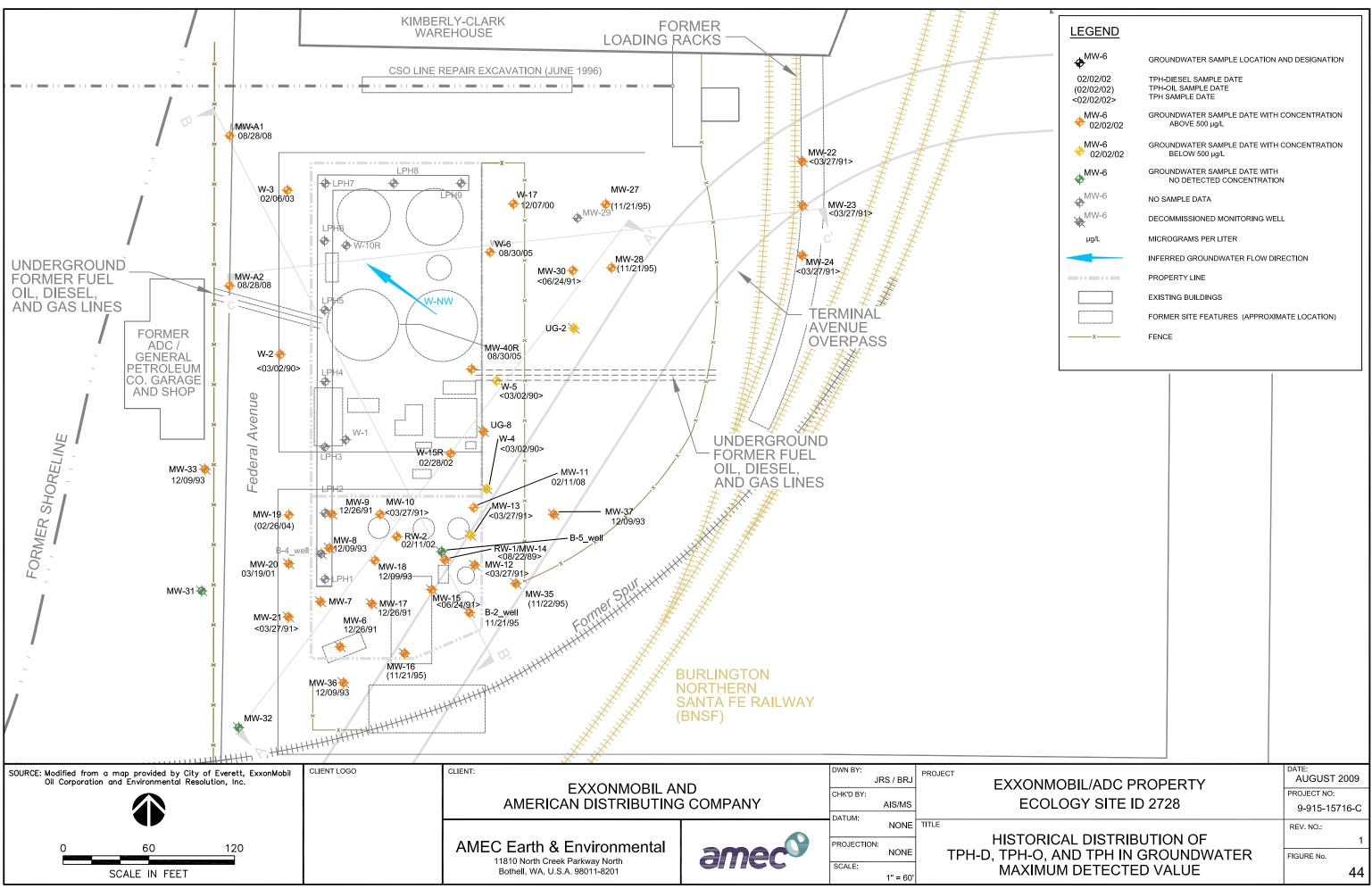


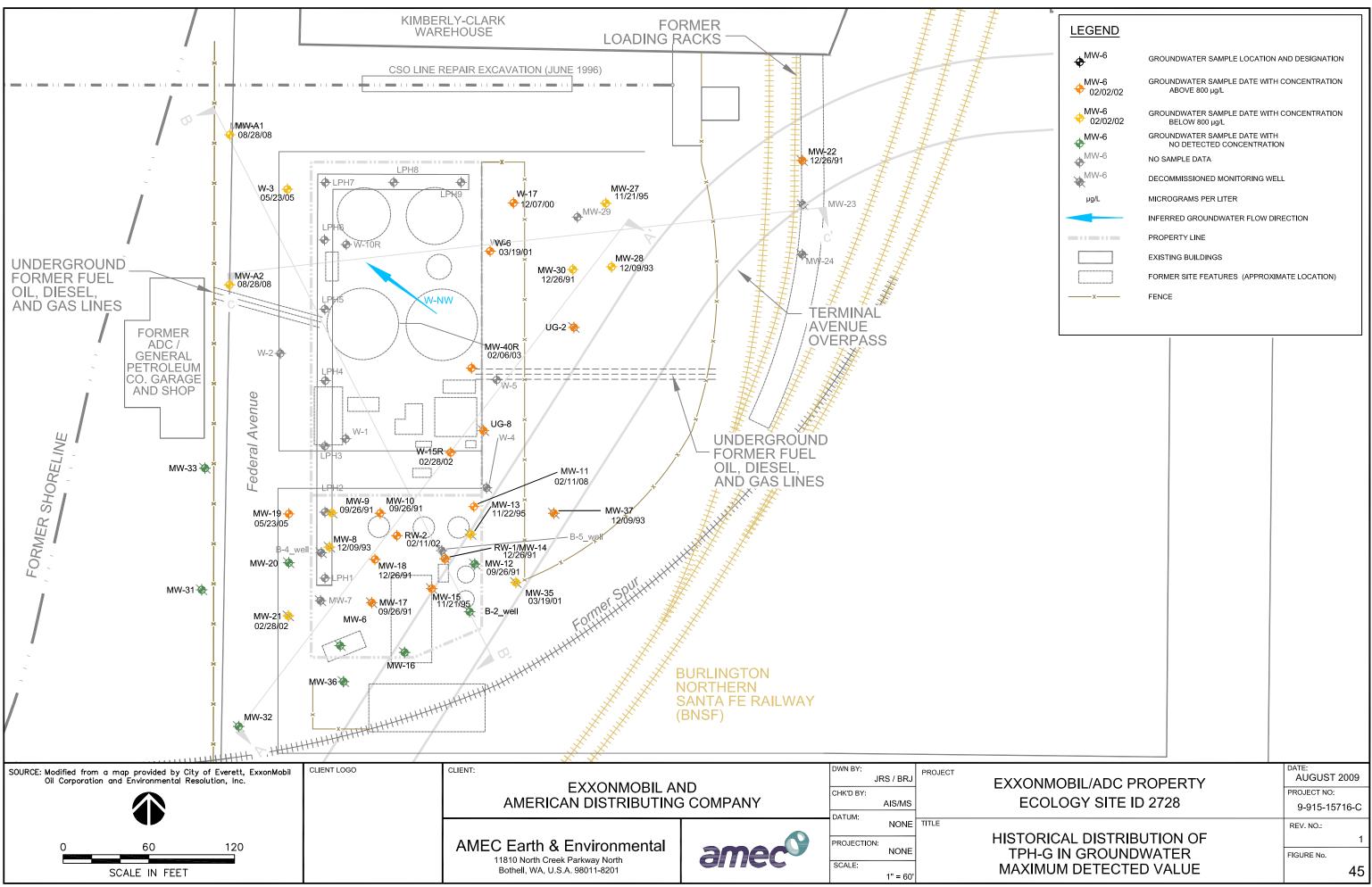


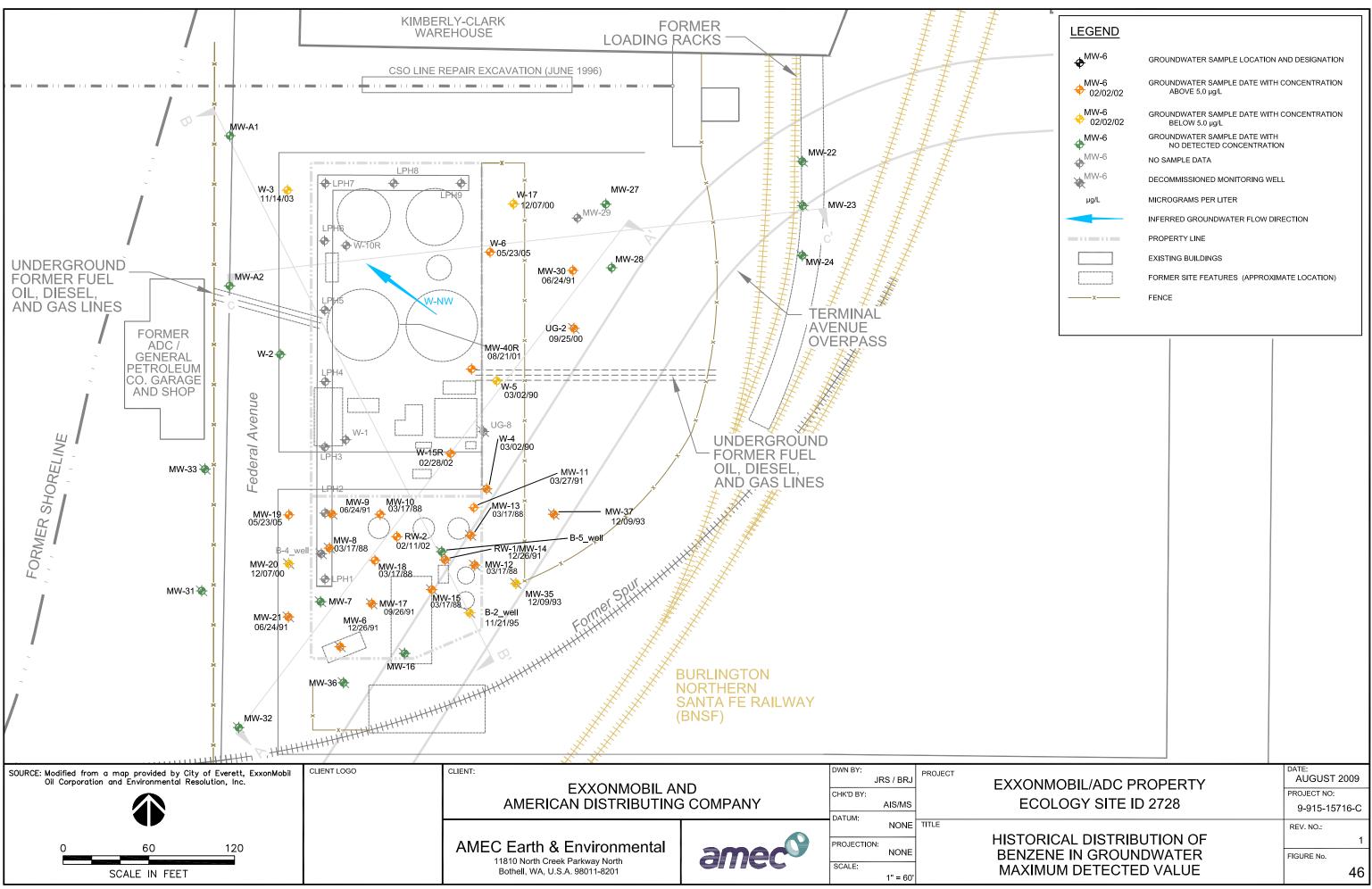


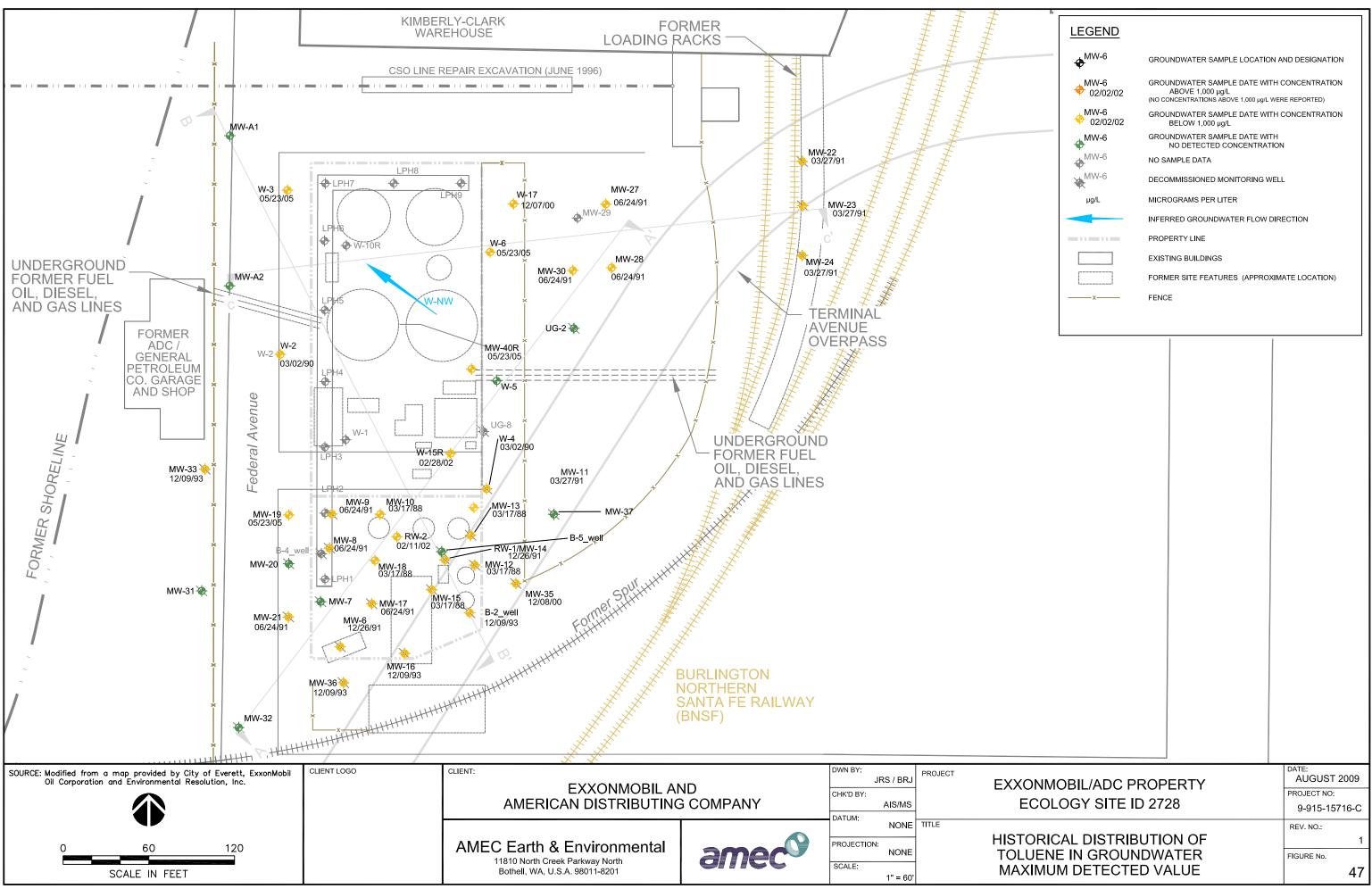


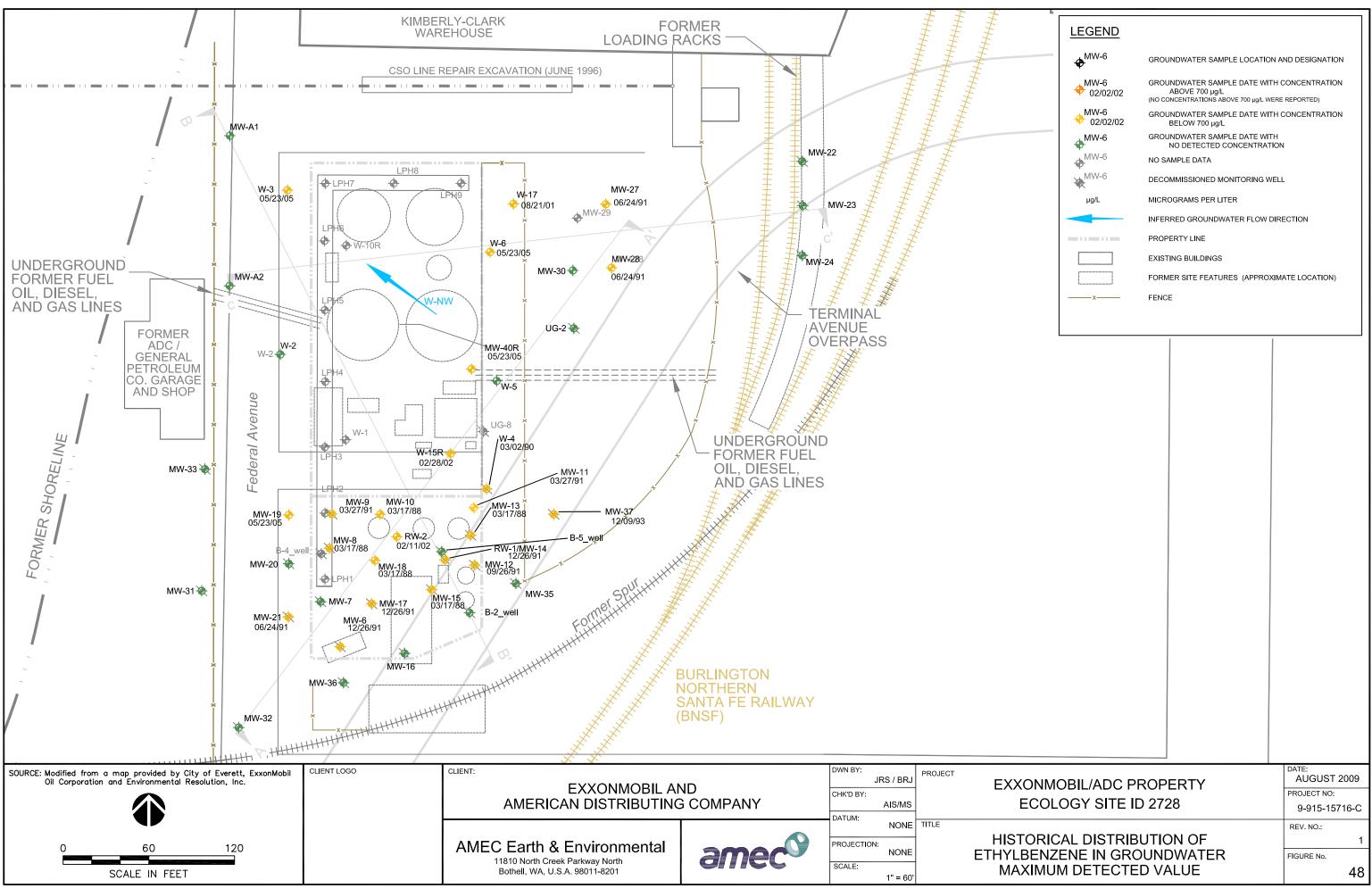


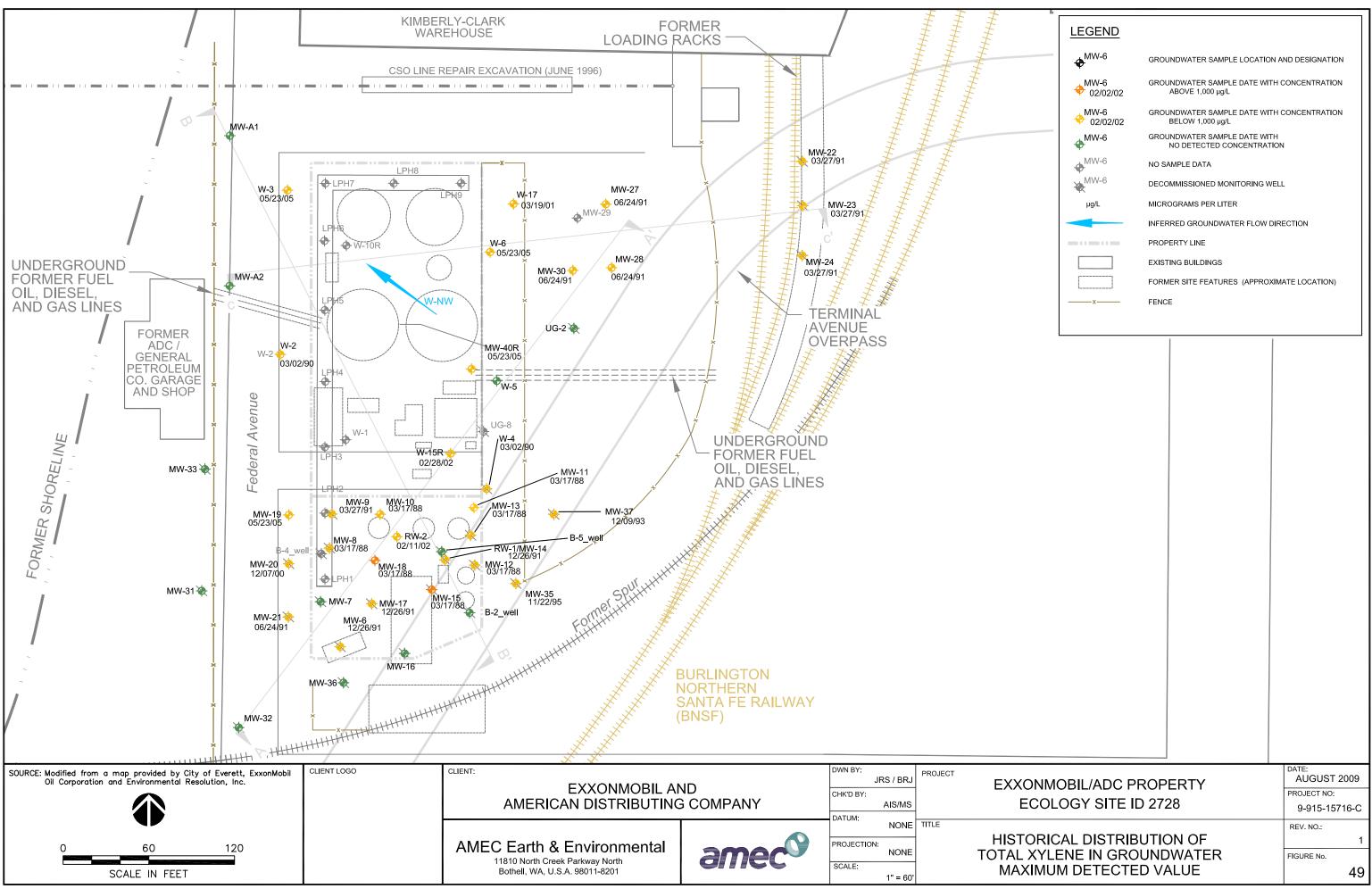


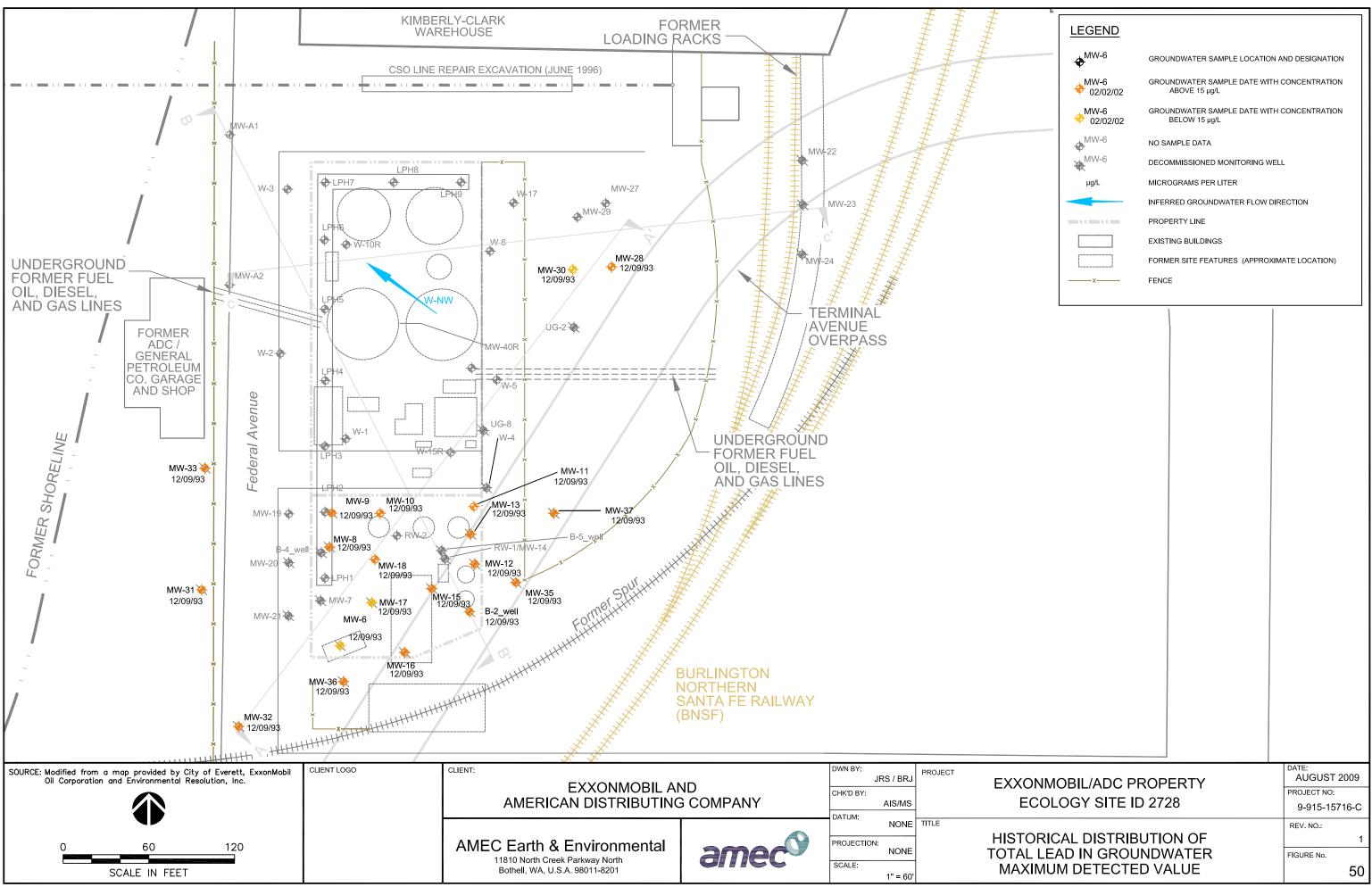


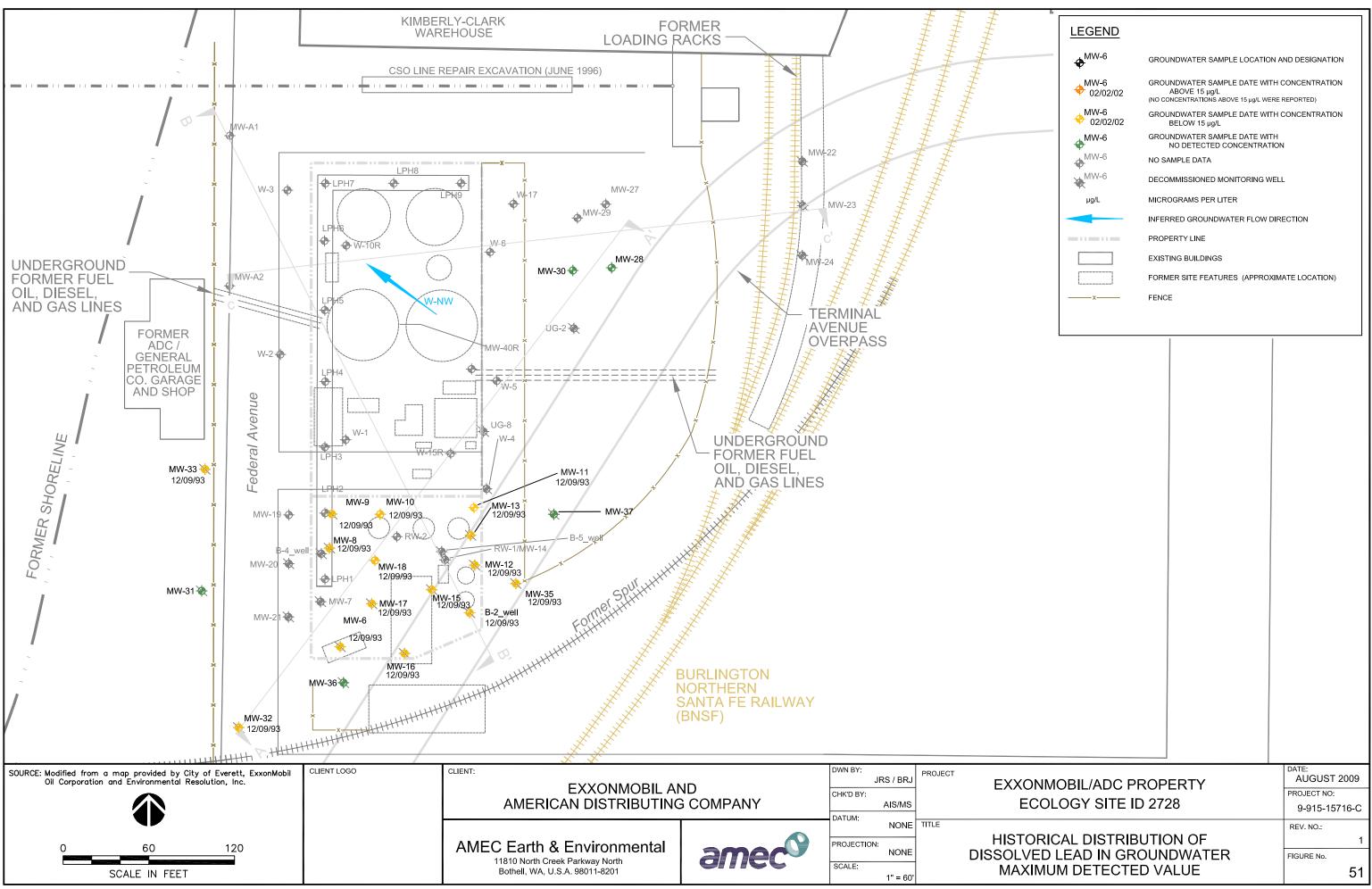


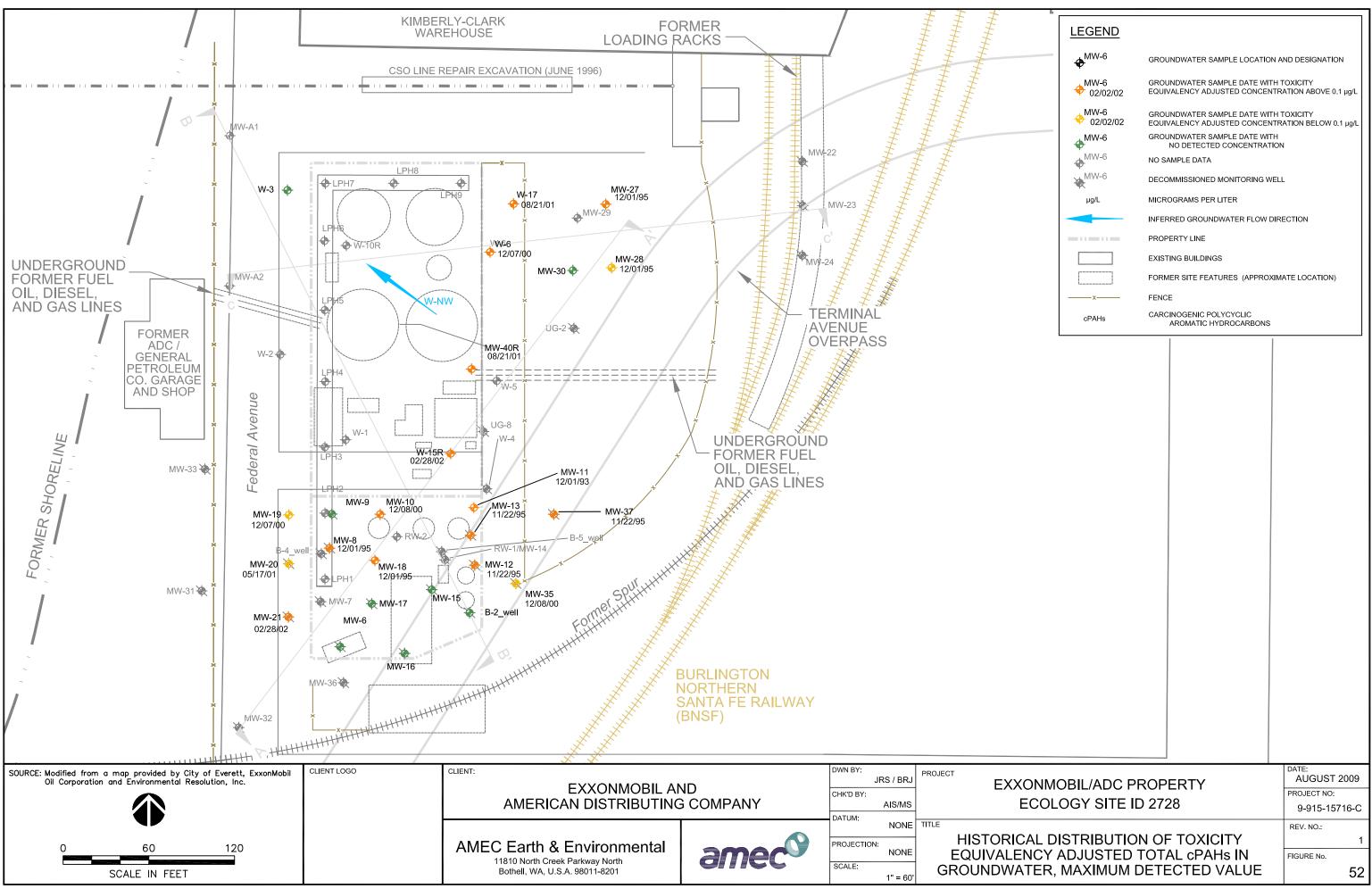


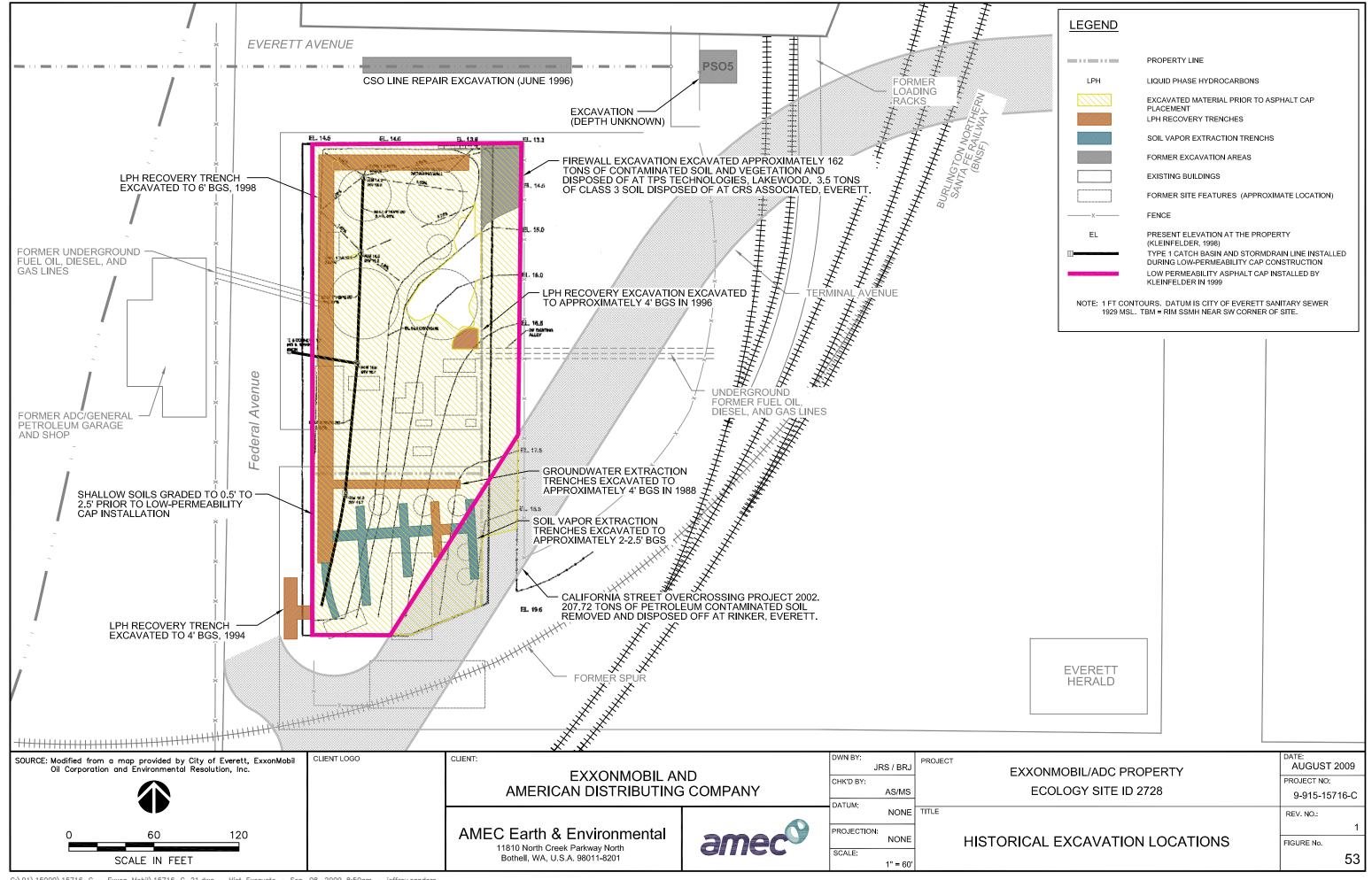


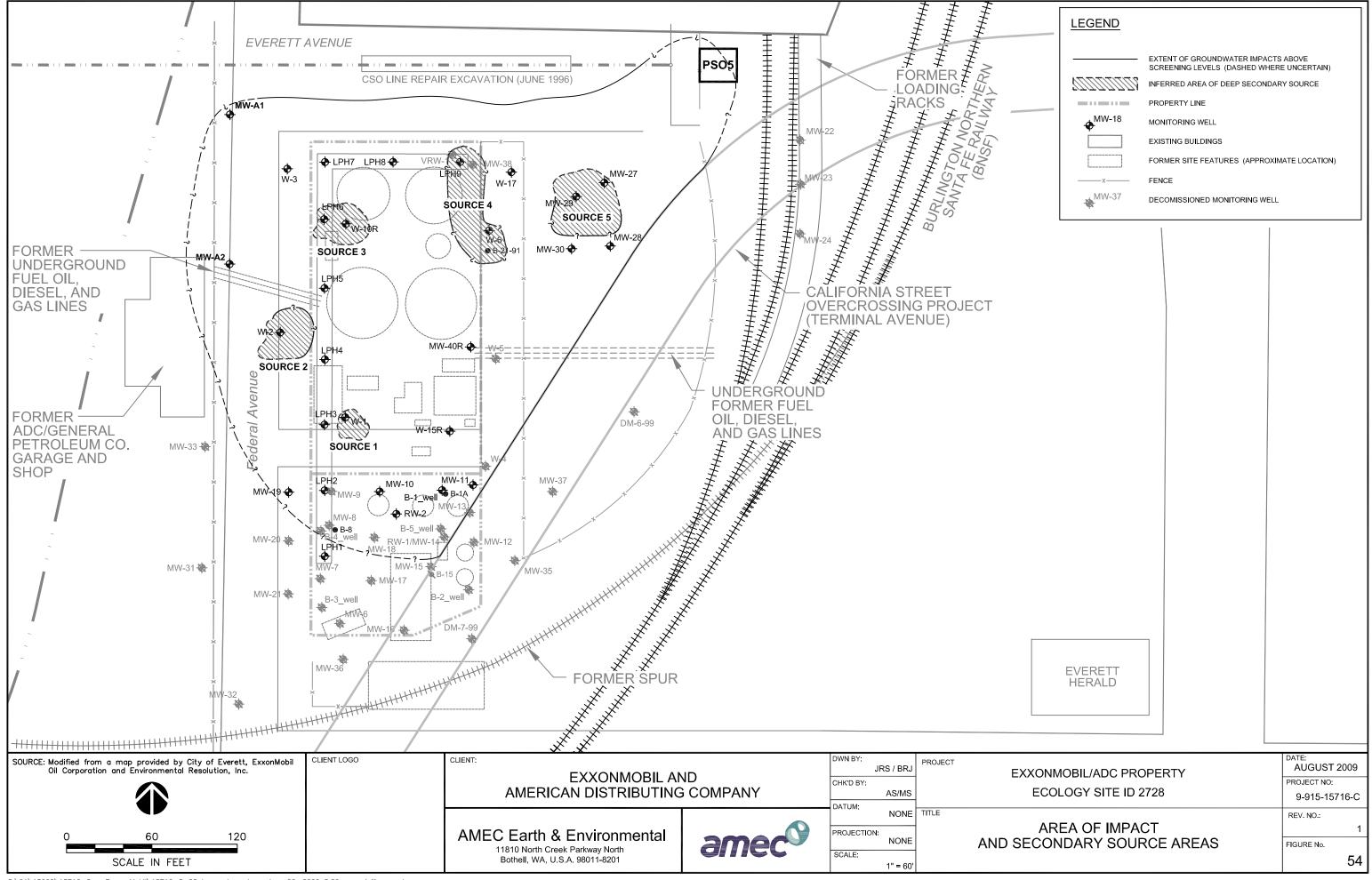


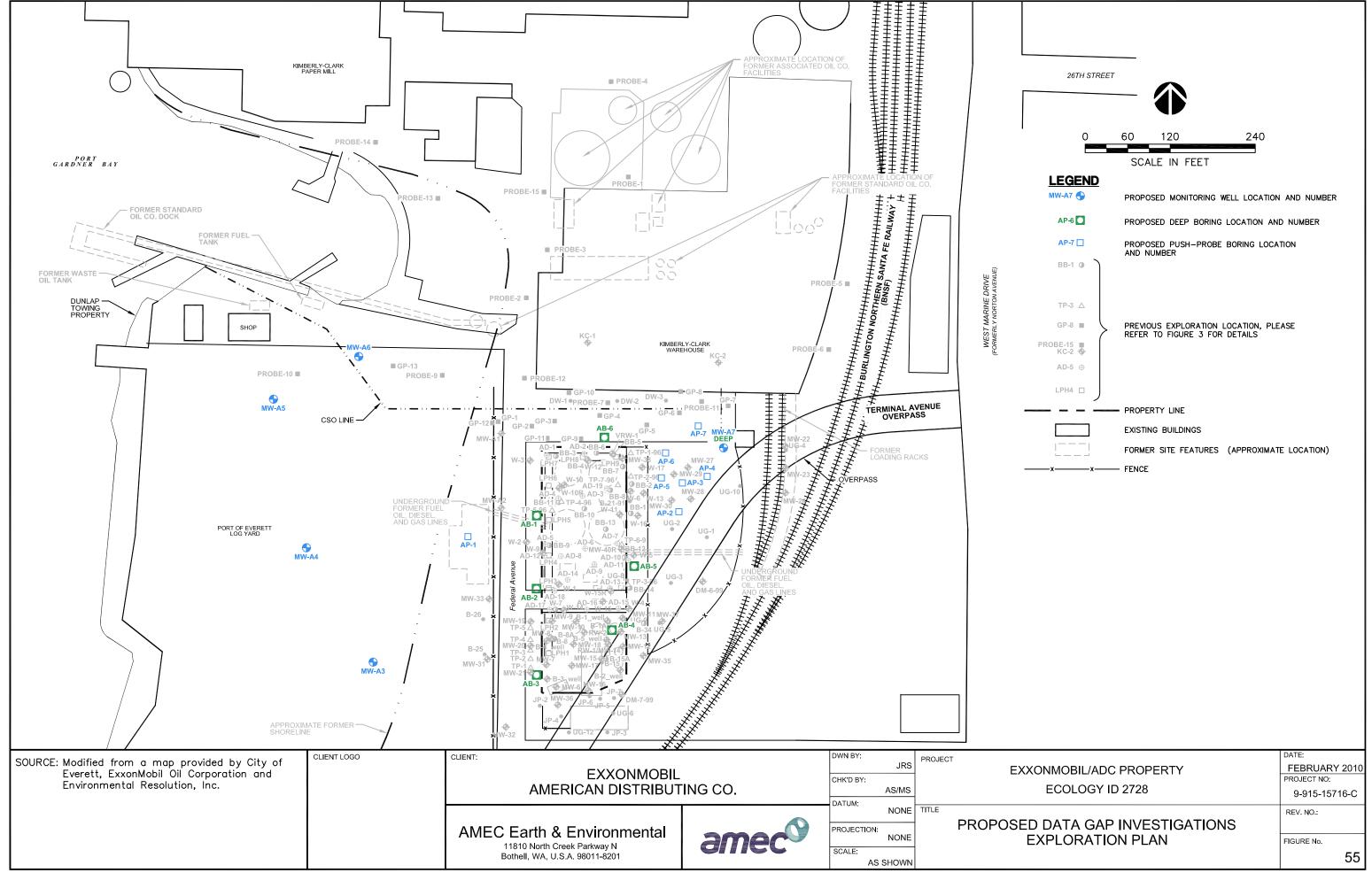












APPENDIX A

Sampling and Analysis Plan



SAMPLING AND ANALYSIS PLAN ExxonMobil / ADC Property, Ecology Site ID 2728 2717/2731 Federal Avenue Everett, Washington

Submitted to:

ExxonMobil Environmental Services

East Providence Terminal 1001 Wampanoag Trail Riverside, Rhode Island 02915

and

American Distributing Company

13618 45th Avenue NE Marysville, Washington 98271

Submitted by:

AMEC Earth & Environmental, Inc.

11810 North Creek Parkway North Bothell, Washington 98011

February 26, 2010

AMEC Project No. 8-915-15716-C

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ACRONYMS AND ABBREVIATIONS

ADC American Distributing Company
AMEC AMEC Earth & Environmental, Inc.

bgs below ground surface

BTEX benzene, toluene, ethylbenzene, and xylenes

COC chain-of-custodies
CSS Colorado silica sand

DAHP Washington State Department of Archaeology and Historic Preservation

DQIs data quality indicators
DQOs data quality objectives

Ecology Washington State Department of Ecology

EDB ethylene dibromide EDC 1,2-dichloroethane

EPA U.S. Environmental Protection Agency EPH extractable petroleum hydrocarbons

ExxonMobil ExxonMobil Oil Corporation
FFS Focused Feasibility Study
HASP Health and Safety Plan
HSA hollow stem auger

IDW investigation derived waste mg/kg milligram per kilograms

mg/L milligram/liter

MDLs method detection limits

MS/MSD matrix spike/matrix spike duplicate

mV millivolt

NTUs nephelometric turbidity units
PAHs polycyclic aromatic hydrocarbons

PID photoionization detector

PPE personal protective equipment

ppm parts per million PVC polyvinyl chloride

Property ExxonMobil/ADC Property

QA quality assurance QC quality control

RPD relative percent difference SAP Sampling and Analysis Plan

SD standard deviation

TPH-D total petroleum hydrocarbons—diesel
TPH-O total petroleum hydrocarbons—oil
TPH-G total petroleum hydrocarbons—gasoline

VOCs volatile organic compounds
VPH volatile petroleum hydrocarbons
WAC Washington Administrative Code

WP Work Plan

SAMPLING AND ANALYSIS PLAN 2717/2731 FEDERAL AVENUE EVERETT, WASHINGTON February 26, 2010

1.0 INTRODUCTION

AMEC Earth & Environmental, Inc. (AMEC), has prepared this Sampling and Analysis Plan (SAP) as part of the Focused Feasibility Study (FFS) Work Plan (WP) on behalf of ExxonMobil Oil Corporation (ExxonMobil) and the American Distributing Company (ADC) for the ExxonMobil/ADC Property (the Property) located at 2717 and 2731 Federal Avenue in Everett, Washington (Figure 1). This SAP outlines supplemental field investigations that will be conducted at and near the Property to fill remaining data gaps and obtain the information required to complete the FFS for the Exxon Mobil/ADC Site (Washington State Department of Ecology [Ecology] Ecology Facility ID 2728). This SAP addresses the specific field sampling activities, chemical analyses, and quality assurance (QA) procedures that will be conducted during additional investigations at the Property.

2.0 OBJECTIVES

The objective of the soil and groundwater investigation is to collect additional data needed to define the nature and extent of contamination, support decisions regarding future environmental cleanup, and fill existing data gaps to provide the information necessary to complete the FFS. The soil and groundwater investigation will include the following activities.

- 1. Install five new groundwater monitoring wells (MW-A3 through MW-A7) to the maximum depth of 15 feet bgs to define the western, northwestern, and northeastern limits of the dissolved-phase plume and to identify potential contamination associated with the former ADC Garage and Shop. Soil samples will be collected from each soil boring for laboratory analysis to ensure that additional petroleum hydrocarbon sources are not contributing to the existing plume (Figure 2).
- 2. Advance seven deep soil borings around the perimeter of the Property (AB-1 through AB-6) and off-Property to the northeast (MW-A7) to a maximum depth of 35 feet below ground surface (bgs) to determine if a silt layer is present beneath the fill and collect samples for geotechnical analysis. Deep boring MW-A7 will be backfilled to a depth of 13 feet bgs and converted to a shallow monitoring well screened from 3 to 13 feet bgs.
- 3. Four of the six deep soil borings (AB-1, AB-2, AB-5, and AB-6) will be advanced around the perimeter of the Property to assist in evaluating the lateral extent of the secondary source areas 1, 2, and 4 (Section 7.2 in FFS WP). Soil samples from borings AB-1 and AB-5 will be collected continuously from approximately 0.5 to 5 feet bgs. Shallow samples (above water table) with obvious signs of petroleum-hydrocarbon contamination will be analyzed for TPH-D and TPH-O.

- 4. Advance seven shallow soil borings (AP-1 through AP-7) to a maximum depth of 15 feet bgs. Six soil borings will be drilled east portion of the Property (near former General Petroleum Corporation's spur fuel loading racks) to define the lateral and vertical extent of soil contamination in the vicinity of MW-29. The seventh boring (AP-1) will be drilled in the area of the former ADC Garage and Shop to determine if any hydrocarbons are present in soils beneath the shop floor. A grab groundwater sample will be collected from AP-1.
- 5. Perform four quarters of groundwater sampling in all new monitoring wells and in five existing wells for natural attenuation parameters. Groundwater sampling for chemistry parameters will be conducted to be representative of separate wet and dry seasons. During two of the four quarterly sampling events, the groundwater sampling program will include general chemistry water quality parameters (i.e., dissolved oxygen, total organic carbon, alkalinity), in addition to the standard suite of laboratory analytical methods in select monitoring wells.
- 6. Conduct aquifer testing in two monitoring wells to determine the hydraulic conductivity of off-Property aquifer materials. The aquifer testing will consist of slug tests conducted in newly constructed monitoring wells MW-A5 and MW-A6.
- 7. Undertake a comprehensive tidal influence study incorporating a temporary stilling well in Puget Sound as well as newly installed and existing groundwater monitoring wells.

3.0 PROJECT ORGANIZATION AND RESPONSIBILITIES

AMEC Earth & Environmental, Inc. (AMEC) is the environmental consultant for this project.

The project is organized as follows:

ExxonMobil and ADC are the owners of the Site.

- Gary Dupuy (phone number 206-342-1777) and Meg Strong (phone number 425-368-0966) are the client managers for the project
- Leah Vigoren (phone number 206-838-8470) is the project manager and is responsible for project management. Technical and administrative elements are included in her project management responsibilities.
- Anastasia Speransky (phone number 206-838-1776) is the task manager for the project and quality assurance manager for this project, which includes data quality objectives, and quality assurance/quality control (QA/QC) objectives.
- Heather Vick (phone number 206-838-8463) is the project hydrogeologist. She is responsible for hydrogeological field activities as well as health and safety.
- Test America, Inc., in Tacoma, Washington, is responsible for managing analyses of the samples collected. The laboratory is also responsible for sample preparation and ensuring that the QA/QC results from the laboratory are valid.

4.0 DATA QUALITY OBJECTIVES

Data Quality Objectives (DQOs) is a quality management tool developed by the U.S. Environmental Protection Agency (EPA) that is used to facilitate the planning of data collection activities. The DQO process provides a systematic procedure for defining criteria in the data collection design. The primary reference for the formal DQO process is EPA's guidance document (EPA 1994). The DQO process consists of the following seven key steps.

- 1. State the problem.
- 2. Identify the decision.
- 3. Identify the inputs to the decision.
- 4. Define the boundaries of the study.
- 5. Develop a decision rule.
- 6. Specify tolerable limits on decision errors.
- 7. Optimize the design for obtaining data.

DQOs are qualitative and quantitative statements, developed using the DQO process, that are intended to clarify study objectives, define an appropriate type of data, and specify tolerable levels of potential decision errors that will be used as the basis for establishing the quality and quantity of data needed to support decisions.

Table 1 provides the DQOs for the work described in this SAP. Table 2 provides a list of the indicator hazardous substances and their MTCA cleanup criteria.

Data Quality Indicators (DQI) (accuracy, precision, completeness, representativeness, comparability, and method detection limits) refer to quality control criteria established for various aspects of data gathering, sampling, or analysis activity. In defining DQIs specifically for the project, the level of uncertainty associated with each measurement is determined.

Accuracy is the degree of agreement of a measurement with a known or true value. To determine accuracy, a laboratory or field value is compared to a known or true concentration. Accuracy is determined by such quality control (QC) indicators as: matrix spikes (MS), surrogate spikes, laboratory control samples (blind spikes) and performance samples. The frequency of analysis of laboratory control samples will be as follows: Method NWTPH-Gx:1 every 20 samples; Method NWTPH-Dx:1 every 10 samples; Method NWTPH-VPH: 1 every 20 samples; Method NWTPH EPH: 1 every 20 samples; Method 8260B: 1 every 12 hours and Method 8270: 1 every 20 samples.

Precision is the degree of mutual agreement between or among independent measurements of a similar property (usually reported as a standard deviation [SD] or relative percent difference [RPD]). This indicator relates to the analysis of duplicate laboratory or field samples. An RPD of ≤50% for water and ≤50% for soil, depending upon the chemical being analyzed, is generally

acceptable. Typically field precision is assessed by field duplicates and laboratory precision is assessed using laboratory duplicates, matrix spike duplicates, or laboratory control sample duplicates).

Completeness is expressed as percent of valid usable data actually obtained compared to the amount that was expected. Due to a variety of circumstances, sometimes either not all samples scheduled to be collected can be collected or else the data from samples cannot be used (for example, samples lost, bottles broken, instrument failures, laboratory errors, etc.). The minimum percent of completed analyses defined in this section depends on how much information is needed for decision making. Generally, completeness percent goals increase when the fewer the number of samples are collected per event or the more critical the data are for decision making. Goals in the 90 to 95% range are typical.

Representativeness is the expression of the degree to which data accurately and precisely represent a characteristic of an environmental condition or a population. It relates both to the area of interest and to the method of taking the individual sample. The idea of representativeness should be incorporated into discussions of sampling design. Representativeness is best assured by a comprehensive statistical sampling design, but it is recognized that this is usually outside the scope of most one-time events. Most one-time event SAP's focus on issues related to judgmental sampling and why certain areas are included or not included and the steps being taken to avoid either false positives or false negatives.

Comparability expresses the confidence with which one data set can be compared to another. The use of methods from EPA or "Standard Methods" or from some other recognized sources allows the data to be compared facilitating evaluation of trends or changes in a site, a river, groundwater, etc. Comparability also refers to the reporting of data in comparable units so direct comparisons are simplified (e.g., this avoids comparison of milligram/liter (mg/L) for nitrate reported as nitrogen to mg/L of nitrate reported as nitrate, or parts per million (ppm) vs. mg/L discussions).

Detection Limit(s) [usually expressed as method detection limits (MDLs) or Quantitation Limit(s)] for all analytes or compounds of interest for all analyses requested is presented on Table 1. These limits should be related to any decisions that will be made as a result of the data collection effort. A critical element to be addressed is how these limits relate to any regulatory or action levels that may apply.

Data Review and Management

Data management will commence during the field investigation. Each soil and groundwater sample collected will be recorded in a bound field book which will include a description of the location, depth, matrix, sample ID, and date and time of collection. Once data has returned from the laboratory, the electronic deliverables will be reviewed to ensure the receipt of all requested analytes and again cross-checked with chain-of-custodies (COCs). Data will be tabulated in electronic spreadsheets and again checked to ensure proper entry before use in reporting.

Assessment Oversight

The project manager will ensure that sample methods and documentation are being practiced. Quality assurance (QA) systems will be emplaced at regular intervals during the data management process as described above. Finally, a peer review process by a senior technical staff will be conducted on the final reporting.

Corrective Actions

Corrective actions, if necessary, shall be completed. If acceptance criteria were not met and a corrective action was not successful or corrective action was not performed, data will be flagged appropriately. Requirements and procedures for documenting the need for corrective actions are described in this section.

Items requiring corrective action in the laboratory shall be documented by the use of a corrective action report. The QA coordinator or any other laboratory member can initiate the corrective action report request in the event QC results exceed acceptability limits, or upon identification of some other laboratory problem. Corrective actions can include reanalysis of the sample or samples affected, resampling and analysis, or a change in procedures, depending upon the severity of the problem.

5.0 PRE- FIELD ACTIVITIES

AMEC will arrange to clear the existing utilities in the project area prior to initiation of field activities. AMEC will contract a private utility locating service in addition to contacting the underground utilities location center (Call Before You Dig). Prior to field activities, AMEC will complete the following activities.

- 1. Prepare a site-specific Health and Safety Plan (HASP) (Attachment A1).
- 2. Mark the proposed boring and monitoring well locations.
- 3. Acquire appropriate permits for drilling and installing monitoring wells.

5.1 Field Health and Safety Procedures

Field personnel will adhere to the health and safety procedures detailed in the *Site-Specific Health and Safety Plan*. Potential hazards that may be encountered include heat stress, slips, trips, falls, and exposure to insects.

The hospital closest to the Site is Providence Hospital. An emergency contact list and a map illustrating the emergency route to Providence Hospital is located in the *Health and Safety Plan*.

It is anticipated that all fieldwork will be performed using Level D modified personal protective equipment (PPE), which includes safety glasses, steel-toed boots, and nitrile and/or leather gloves. At a minimum, each on-Site worker will be required to wear safety footwear (steel-toed boots), hard hat, hearing protection, eye protection, and a high visibility safety vest. PPE will be

upgraded whenever there is a potential for direct contact with contaminated soil or groundwater. Changes in the required PPE will be based on changed work conditions and field observations. PPE upgrades may consist of the following:

- Nitrile gloves (surgical-type);
- Tyvek Coveralls if a splash transfer is considered likely;
- Additional PPE upgrades that may be required, depending on breathing zone levels of petroleum hydrocarbons detected.

Eating, drinking, chewing gum or tobacco, smoking, or any practice that involves hand-to mouth contact increases the probability of contaminant ingestion and is prohibited in any area where the possibility of contamination exists.

Potential physical hazards that may be encountered include heat stress, slips, trips, and falls.

The AMEC field team will have current certifications for first aid, and a cell phone will be available at all times while personnel are in the field. All emergency response services will be reached by calling 911, from a land line if available.

6.0 FIELD PROCEDURES

This section presents the field investigation procedures for the soil and groundwater sampling effort. The field investigation will consist of drilling soil borings, installing monitoring wells, and collecting soil and groundwater samples. The proposed soil boring and monitoring well locations are illustrated on Figure 1. The proposed soil boring locations are listed in Table 3.

6.1 Utility Survey

AMEC will identify all aboveground and overhead power lines. Proposed boring locations that are within 25 feet of an overhead power line will be moved until clearance is achieved. AMEC will also oversee a geophysical survey conducted by a private utility locator to identify subsurface utilities within 25 feet of the proposed soil boring locations. The presence of belowgrade utilities will be identified, and their inferred locations will be marked on the ground surface at the site. In addition, subsurface activity locations may be reviewed with the owner or the representative of the owner, if available at the time.

6.2 Calibration of Field Equipment

Field instrument calibration will occur daily at the beginning of field activities. Calibration results and times will be recorded in the field notes. Field equipment requiring calibration includes the photoionization detector (PID) and the Horiba U-22 (or equivalent) water quality meter.

Calibration instructions for the PID and water quality meter are included with the equipment manuals enclosed in the equipment cases. In general, the PID will be used to screen soil for the presence of lighter end petroleum hydrocarbons, such as gasoline and benzene. A Horiba U-22

water quality meter will be used to measure water quality parameters, such as dissolved oxygen, temperature, oxidation-reduction potential, and turbidity. The Horiba U-22 (or equivalent) will be calibrated daily in accordance with the manufacturer's instructions. A record of the daily calibration will be entered in the field log book.

6.3 Soil Borings

Proposed soil borings are listed in Table 3. Seven shallow soil borings (AP-1 through AP-7) will be advanced to a maximum depth of 15 feet bgs using direct-push technology drilling. These borings will be advanced in the vicinity of MW-29 and the former ADC Garage and Shop. Soil samples will be collected continuously from the surface to the total maximum depth of the borings. A soil sample will be collected at the soil/groundwater interface in each soil boring location. An additional sample will be collected based on odor, staining, PID readings, or sheen. If no soil samples exhibit any of these characteristics, the soil sample will be collected from the bottom of the boring to delineate the vertical extent of contamination. A grab groundwater sample will be collected from AP-1 using a temporary screen.

Seven deep soil borings (AB-1 through AB-6 and MW-A7) will be advanced around the western and northern perimeter of the Property to a maximum depth of 35 feet bgs to determine the lithologic conditions underlying that portion of the Site. The borings will be completed at a depth of 35 feet bgs since any proposed slurry wall can be completed as a hanging wall if there is no silt confining layer to key the wall into. The borings will be advanced using a hollow-stem auger (HSA) rig. A soil sample will be collected at the soil/groundwater interface in each soil boring location. An additional sample will be collected based on odor, staining, PID readings, or sheen. If no soil samples exhibit any of these characteristics, the soil sample will be collected from the bottom of the boring to delineate the vertical extent of contamination.

Four soil borings (MW-A3, MW-A4, MW-A5, and MW-A6) will be advanced on the Port of Everett property and will be completed as shallow monitoring wells using a direct-push drill rig equipped with HSA. The wells will be used to determine the western extent of the dissolved plume. A deep soil boring (MW-A7) drilled to a depth of 35 feet will be backfilled to a depth such that MW-A7 will be installed as a shallow monitoring well which straddles the water table (13 feet bgs).

6.4 Soil Sample Collection

Soil samples will be collected from the proposed soil boring and proposed monitoring well locations shown on Figure 1. All soil boring and monitoring well locations are subject to change based on observed conditions in the field (aboveground and belowground utilities, existing equipment, etc.).

Soil samples from the proposed push-probe soil borings/monitoring wells will be collected continuously using a 4-foot stainless steel sampler with a disposable liner.

Soil samples from the five proposed deep soil borings will be collected continuously for lithologic characterization. AMEC will inspect all soil samples and screen the soil samples for volatile organic compounds (VOCs) using a PID.

Each soil sample will be examined and relevant sample information (e.g., depth of sample collection, date and time of sample acquisition, PID measurement, etc.) will be recorded. To prevent cross contamination, any equipment repeatedly in contact with the soil will be decontaminated before and after each individual sampling attempt.

AMEC will select at least two soil samples per soil boring for laboratory analyses. The sample will be selected at the discretion of AMEC on the basis of field observations including a sheen test. A soil sample will be collected for analysis at the soil/groundwater interface in each soil boring location. An additional sample will be collected based on odor, staining, PID readings or sheen. If no soil samples exhibit any of these characteristics, the soil sample will be collected from the bottom of the boring to delineate the vertical extent of contamination.

Samples will be selected from intervals exhibiting petroleum staining and/or elevated PID measurements, the capillary fringe, and/or within an artificial fill unit.

6.5 Sample Containers, Preservation and Storage

Soil and groundwater samples will be collected and placed into precleaned sample containers provided by the analytical laboratory in accordance with Table 4. Upon collection, sample containers will be sealed, labeled, chilled to 4°C in a cooler with ice, and maintained with AMEC's custody until delivery to the project analytical laboratory, Test America, Inc., in Tacoma, Washington.

6.6 Sample Labeling

Each sample container sent to the lab will have a unique sample identification label.

The following information will be included on the sample label:

- Project name and location;
- Project number;
- Sample identification number including sample collection depth;
- Sample depth;
- Date and time of collection;
- Analyses to be performed; and
- Initials of the sampler.

Each soil sample will be assigned a unique alphanumeric code that will be used to identify the source of the sample location. Soil samples will be identified by a label indicating the boring or

monitoring well number followed by a dash followed by the depth (feet) below the ground surface that the sample was collected.

6.7 Soil Sample Analyses

Selected soil samples will be submitted to the laboratory for the area-specific chemical analysis. The laboratory analysis will include one or more of the following:

- Total Petroleum Hydrocarbons as Gasoline (TPH-G) by Ecology Method Northwest Total Petroleum Hydrocarbon–Gasoline (NWTPH-G);
- TPH as Diesel and Oil (TPH-D and TPH-O) by Ecology Method NWTPH-Diesel Extended (NWTPH-Dx); TPH-Dx detections with chromatograms that will be run with a silica gel cleanup to remove any biogenic interference (typically from decaying plant matter);
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX) and methyl tertiary butyl ether (MTBE) by U.S. Environmental Protection Agency (EPA) Method 8260B;
- Low-level polycyclic aromatic hydrocarbons (PAHs) by EPA method 8270D SIM;
- 1,2-Dichloroethane (EDC), ethylene dibromide (EDB), and n-hexane in select soil samples that exhibit contamination based on field screening;
- Extractable Petroleum Hydrocarbons (EPH) by Method NW-EPH;
- Volatile Petroleum Hydrocarbons (VPH) by Method NW-VPH.

Soil samples for TPH-G, VOC, and EPH/VPH analyses will be collected using a plastic syringe and placed into laboratory-supplied, preweighed volatile organic analyte vials in accordance with EPA soil sampling method 5035A. Soil samples for all other analyses will be placed in laboratory-supplied glass sample jars and securely fitted with Teflon-lined plastic lids. Particles greater than 2 centimeters in diameter will be removed from the samples and discarded with the drilling cuttings.

EPH and VPH analysis will be requested for soil samples with the highest concentrations of petroleum hydrocarbons and benzene.

Soil sample methods, required sample containers, preservation requirements, and holding times are provided in Table 4.

6.8 Soil Geotechnical Analyses

Two soil samples collected from the saturated zone of the perimeter borings will be analyzed for the following: total organic carbon, soil bulk density, porosity, volumetric water content, and permeability (Shelby tube). Samples of drill cuttings will be retained from each boring for use in slurry wall mix design, if necessary. Two 5-gallon buckets of drill cuttings from the 5- to 15-foot depth interval will be collected from each boring location. Shelby tube samples will be collected from fine-grained materials as undisturbed samples. The Shelby tube sampler will be pushed

into undisturbed soil following retrieval of a split-spoon sample that indicates that a fine-grained formation has been encountered. Data from this testing will be used to assist in the development of remedial alternatives. Geotechnical analytical methods are listed in Table 5.

6.9 Monitoring Well Installation and Development

One deep and four shallow monitoring wells (MW-A3, MW-A4, MW-A5, MW-A6, and MW-A7) will be installed using an HSA drill rig and equipment. Soil borings for the monitoring wells will be advanced using 8-inch inside diameter augers. Soil samples to be collected from the monitoring well borings are listed in Table 3. The monitoring wells will be installed in accordance with Washington Administrative Code (WAC) 173-160 Minimum Standards for Construction and Maintenance of Wells.

Each of the monitoring wells will be constructed using 2-inch-diameter, flush-threaded Schedule 40 polyvinyl chloride (PVC) with a 10-foot-long prepack slotted screen with 0.010-inch slots and a 12/20 Colorado silica sand (CSS) pack. A prepack screen is proposed in order to minimize turbidity that has been observed at other monitoring wells in the Site vicinity. The prepack screens also allow rapid construction, since the soil in the area has been observed to heave. The well screens will be installed to straddle the water table. Additional sand (10/20 CSS) will be placed in the annular space surrounding the prepack screens. The sand pack will extend to a height of at least 1 foot above the top of the screen. Placement of the well screen will be determined in the field based on drilling conditions. The wells will be completed with a grout seal to the ground surface. The surface completion will conform to State of Washington standards and will be an 8-inch-diameter, flush-mounted, traffic-rated well monument. Monuments on the Port of Everett property will be constructed of materials that have the same or similar specifications to an eight inch Sherwood monitoring well cover with an 18 inch sonotube concrete surround.

All monitoring wells will be fitted with water-tight locking well caps and locks that are keyed alike.

Following well installation, the monitoring wells will be developed by surging with a surge block, followed by removing water by pumping until the water is clear and free of suspended solids. A minimum of six well volumes will be removed from each newly installed monitoring well. If the well purges dry, well development will resume when the water in the well recharges to 80 percent of the original recorded volume. Well development will cease upon stabilization of temperature, pH, and specific conductivity and turbidity measurements and the removal of six well volumes or two cycles of purging dry, whichever occurs first. AMEC will record the volume of water removed and water quality parameters during well development. An objective of the well development will be to obtain a turbidity value of 5 nephelometric turbidity units (NTU) or as low as is practically possible. The monitoring well development water will be contained in 55-gallon drums and stored at the Property.

6.10 Surveying of Monitoring Wells

The horizontal locations and the elevations of the tops of inner and outer casings of the newly installed monitoring wells will be surveyed by a Washington licensed surveyor. Elevations will be established to the nearest 0.01 foot; locations to the nearest 0.1 foot. The monitoring wells will be surveyed to tie into the existing monitoring well network. Both horizontal and vertical controls used for the new well survey will be consistent with horizontal and vertical controls used previously for surveying monitoring wells

6.11 Groundwater Level Measurements

Groundwater surface elevations will be used to make an initial assessment of the groundwater potentiometric surface, surface gradient, and direction of groundwater flow. During each groundwater sampling event, two groundwater elevation surveys will be conducted. One survey will be conducted during the high tidal stage, and one survey will be conducted during the low tidal stage.

The groundwater elevation will be measured with a decontaminated electronic water level meter or oil/water interface probe with an accuracy of plus or minus 0.01 feet. The groundwater elevation measurement will be made from a reference point on the top of the PVC well casing (to be surveyed and marked by land surveyors).

The water level probe will be decontaminated between each use, and wells with known or suspected contamination will be measured last.

6.12 Groundwater Sample Collection

Groundwater samples will be collected from the newly installed monitoring wells after a minimum of 7 days following development. Existing monitoring wells that do not have a history of containing liquid petroleum hydrocarbons (LPH) will also be sampled. Existing monitoring wells (MW-11, MW 19, MW40R, MW-A1 and MW-A2) and newly installed monitoring wells (MW-A3 through MW-A7) will be sampled using low-flow groundwater sampling techniques (Puls and Barcelona 1996). The groundwater sampling procedure will consist of the following steps.

- 1. Open well cap and allow well to equilibrate for several minutes.
- 2. Place an interface probe into the well to determine if LPH is present and measure thickness, if present. The well will not be sampled if LPH is present.
- 3. Measure depth to water from established top of casing measuring point and record on groundwater sampling field data sheet. Determine the middle depth of the water column that is within the screened interval.
- 4. Using dedicated (cutter used only for this purpose and kept in a plastic bag) tubing cutter, cut a length of new, low-density polyethylene tubing to extend to the middle depth

- of the water column in the well. Connect the end of the tubing to peristaltic pump using dedicated silicone or MasterflexTM tubing.
- 5. Connect additional tubing to pump discharge line and flow-through cell. Establish flow rate of less than 200 milliliters/minute.
- 6. Record readings every 3 to 5 minutes with Horiba U-22 or equivalent water quality meter of the following parameters: temperature, pH, specific conductance, dissolved oxygen, oxidation-reduction potential, and turbidity.
- 7. Also record every 3 to 5 minute measurements of flow rate and depth to water. If drawdown in well exceeds 0.30 feet, reduce flow rate.
- 8. Stabilization of water quality parameters is assumed when measured parameters are within the following ranges:
 - ± 10 percent pH (standard units)
 - ± 3 percent electrical conductivity (milli-Siemens per centimeter [mS/cm])
 - ± 10 percent oxidation-reduction potential (millivolt [mV])
 - ± 10 percent turbidity (Nephelometric Turbidity Units [NTUs])
 - ± 10 percent dissolved oxygen (milligram per liter [mg/L])
 - ± 10 percent temperature (degrees Centigrade)
- 9. After stabilization of water quality parameters is achieved, disconnect tubing from flow-through cell and begin sample collection directly from pump discharge tubing.
- 10. Reduce flow rate to minimal possible flow for collection of volatile organic compound fraction.

6.13 Groundwater Sample Analyses

Increased turbidity in groundwater samples is attributed to soil lithological characteristics, increased organic content and/or improper purging and sampling rates during groundwater sample collection. High concentrations of total metals such as lead occurring in groundwater samples is most likely due to increased organic content in the formation being sampled.

Select groundwater samples will be submitted to the laboratory for the area-specific chemical analysis. The laboratory analysis will include one or more of the following:

- TPH using Ecology methods NWTPH-G and NWTPH-Dx;
- BTEX and MTBE by U.S. EPA Method 8260B;
- EDC, EDB, and n-hexane by U.S. EPA 8260B Selected groundwater samples;

- Low-level PAHs by EPA method 8270D SIM;
- Dissolved lead by EPA Method 6020;
- Natural attenuation parameters (see Table 6).

6.14 Equipment Decontamination

Decontamination of sampling equipment will be performed to maintain data quality, to prevent cross contamination, and to prevent the potential introduction of contaminants into previously unimpacted areas. Reusable sampling equipment, including the drill rig, down-hole drilling equipment, and stainless-steel materials, will be decontaminated prior to each sampling event. General decontamination procedures for nondedicated soil sampling equipment and accessories are as follows.

- Physically remove soils using a nonphosphate detergent solution.
- Rinse with noncontaminated tap water.
- Rinse with deionized water.
- Rinse with Isopropyl alcohol.
- Air dry.

6.15 Investigation Derived Waste Management

Investigation Derived Waste (IDW) generated during the course of the field investigation will be labeled and securely stored on the Property in 55-gallon drums approved by the U.S. Department of Transportation. Drums will be stored at a designated location. The various waste streams will include the following:

- Potentially contaminated liquids, including fluids derived from purging, development of monitoring wells, and equipment decontamination water; and
- Potentially contaminated solids, principally soil cuttings

Each drum will be labeled with standardized IDW drum labels to indicate its contents, date of collection, location from which the IDW originated, and other pertinent information. In addition, all drums will also be labeled with indelible paint sticks or pens. AMEC will maintain an inventory of the drums. On completion of the project, the IDW will be disposed of at an appropriate off-site facility, following a review of the investigation analytical data.

6.16 Aquifer Testing

Aquifer testing will be performed to determine the horizontal hydraulic conductivity of water bearing materials at the Site. The hydraulic conductivity (K) is an important hydraulic parameter for estimating groundwater flow rates and other aquifer characteristics. Slug testing will be

performed to estimate K using monitoring wells MW-A5 and MW-A6, which are located west of the site.

A slug test involves the instantaneous injection or withdrawal of a volume or slug of water or solid cylinder of known volume. This is accomplished by displacing a known volume of water from a well and measuring the artificial fluctuation of the groundwater level in the well. Water level changes are usually measured with pressure transducers and recorded by an electronic data logger.

The following equipment will be used to perform the slug test:

- Tape measure (subdivided into tenths of feet)
- Pressure transducer and data logger
- Electronic water level indicator
- Stainless steel or copper slug of known volume
- Dedicated nylon twine for each well to be tested
- Watch or stopwatch with second hand
- Waterproof logbook and pen
- Laptop computer with data logger software preinstalled prior to field event;
- Supplies for decontaminating slug, including alconox soap, scrub brush, deionized water, and tap water

The following procedure will be used for slug testing each monitoring well.

- 1. Open the monitoring well and allow several minutes for the well to equilibrate to atmospheric pressure.
- 2. Measure and record static water level in well. Be sure to allow time for equilibration with atmospheric pressure for wells with unvented caps. If a dedicated bailer or other sampling apparatus in place interferes with initial reading, minimize disturbance as much as possible, and allow time for re-equilibration. Wait and repeat measurement to confirm the well is at steady state.
- 3. Remove any equipment in the well that would interfere with placing the transducer or conducting the slug test.
- 4. Measure and record the total depth of the well to verify the well depth and verify that the well screen has not been partly silted in. Sediment in the well screen can affect the slug test results.
- 5. Place pressure transducer in well to appropriate depth (see depth limits for individual transducers, or manufacturers specifications). Use measuring tape to determine point on

- cable to set in well. Do not place transducer so that its range will be exceeded, or so that the transducer cable interferes with movement of the slug.
- 6. Place slug in well, above the transducer. If desired, a falling head test can be run at this point. It is often found in highly permeable materials, however, that the time required for the slug to fall through the water column may be comparable to the recovery time, and these data may therefore not be usable.
- 7. When the water level has returned to static height, initialize the data logger.
- 8. Remove the slug. Use auto-start feature if available, or start data logger by hand.
- Test may be terminated after recovery is complete, or after 10 to 15 minutes for wells with slow recovery. If possible, screen data in the field to ensure data quality prior to demobilization.
- 10. Plot data using laptop computer to assure slug test is representative. If data are ambiguous or insufficient, repeat test.

The slug test data will be analyzed using the Bouwer and Rice method (Bouwer 1976, 1989a, 1989b) to obtain estimates of K for each monitoring well tested.

6.17 Tidal Study

A tidal influence study will be conducted to determine if groundwater beneath the Site is affected by tides. Permission will be requested from the Port of Everett to install a temporary stilling well on their dock. The stilling well will be in position for the duration of the Tidal Study at the Site.

Pressure transducers and data loggers will be installed in the four new groundwater monitoring wells on the Port of Everett property (MW-A3, MW-A4, MW-A5, MW-A6) and in existing monitoring wells MW-A1, MW-A2, W-3, MW-11, W-17, W-18 MW-19, MW-28, and MW-40R to record groundwater levels in the zone that is potentially tidally influenced. Specifications of the wells are provided in Table 7. The wells were selected to provide upgradient, on-Site/middle of the site, and downgradient information and are also wells that do not have measured concentrations of free product that would clog the transducers. Monitoring well MW-40R may contain LPH and, if so, will not be used in the tidal influence study.

Elevation measurements will be recorded automatically every 6 minutes for a minimum period of 76 hours. Tidal measurements recorded at the stilling well, located approximately 540 yards to the west of the Site, will be compared to the transducer data.

The data collected from the automatic transducers will be stored in the data logger and downloaded to a computer at the end of the tidal study data collection period. An hour after installation of the in-well transducer, a computer will be linked up to check that it is accurately recording data. On completion, the downloaded data will be corrected for actual groundwater depth and correlated with data from the stilling well. Tidal time lag and tidal efficiencies will be calculated for each monitoring well location. In addition, the tidal study data will be analyzed to determine the mean hydraulic gradient at the site using the method described by Serfes (1991).

The data and the results of the study will be presented in a report to the Washington State Department of Ecology, including maps showing the mean hydraulic gradient at low and high tide and data implications with respect to tidal influence.

6.18 Historic or Cultural Resources

Buried cultural artifacts such as chipped or ground stone, historic refuse, buildings foundations, or human bone could be discovered during subsurface activities, although this is highly unlikely. Initial field activities will include the installation of soil borings and monitoring wells which will result in a minimal amount of site disturbance. As such, a professional archaeologist may not be needed on-site during these activities. Cultural Resource review and the need for any on-site archaeologist will be determined by Ecology in communication with the Department of Archaeology and Historic Preservation (DAHP) and the concerned tribal government.

If any excavations (e.g., test pits) are required for the investigation, a separate cultural resources assessment and work plan will be developed in communication with DAHP and the concerned tribal governments pursuant to RCW 27.44 (Indian graves and records) and 27.53 (Archaeological sites and resources) and a professional archaeologist may required to be onsite to oversee the activities.

If any archaeological resources are discovered during field activities, work will be stopped immediately and Ecology, the DAHP, the City of Everett Planning and Community Development Department, and the Tulalip Tribes Cultural Resources Department will be notified by the close of business. A professional archaeologist will arrange an on-site inspection and invite the parties to attend. The professional archaeologist shall document the discovery and provide a professionally documented site form and report to the above listed parties. In the event of an inadvertent discovery of human remains, work will be immediately halted in the discovery area, the remains will be covered and secured against further disturbance, and the Everett Police Department and Snohomish County Medical Examiner will be immediately contacted, along with DAHP and authorized Tribal representatives. A treatment plan by the professional archaeologist shall be developed in consultation with the above listed parties consistent with RCW 27.44 and RCW 27.53 and implemented according to WAC 25-48.

7.0 DOCUMENTATION

The integrity of data obtained from samples collected during the field investigation depends on proper sample management and handling. Proper sample management includes sample labeling, which includes assignment of a specific identification number and affixing proper identification and markings to the collected samples. Proper handling includes proper packing and transport of the sample containers.

7.1 Field Logbook

The field logbook serves as the primary record of field activities. Entries shall be made chronologically and in sufficient detail to allow the writer or a knowledgeable reviewer to

reconstruct the applicable events. The field logbook shall be bound with consecutively numbered and water repellent pages.

At a minimum, the following information will be recorded in either the field logbook or a separate sample log sheet during the collection of each sample:

- Sample location and description;
- Sampler's name(s);
- Date and time of sample collection;
- Type of sample (soil, groundwater, or surface water);
- Type of sampling equipment used;
- Field instrument readings and calibration; and
- Field observations and details related to analysis or integrity of samples (e.g., weather conditions, noticeable odors, colors, etc.).

7.2 Labeling

Each sample container sent to the lab will have a unique sample identification label. The following information will be included on the sample label:

- Project name and location;
- Project number;
- Sample identification number;
- Date and time of collection; and
- Initials of the sampler.

Each soil sample will be named by the location and depth of sample collection in feet. For example, a soil sample collected from soil boring AP-1 at a depth of 2 feet will have a sample designation as "AP1-2." Groundwater samples will be named by the monitoring well location and the date of sample collection. For example, a groundwater sample collected from MW-A2 on March 7, 2010, would be named "XOMADC-02072010-MWA2."

Duplicate samples will be sent to the laboratory blindly. However, the location of the sample will not be revealed to the laboratory. Instead, duplicate samples will be named sequentially as Dup-1 and Dup-2. The location of the duplicate sample collection will be recorded in the field notebook.

7.3 Sample Chain of Custody

COC forms will be completed at the end of each sampling day. The completed COC form(s) and samples will be kept in the possession of the field team until relinquishing the samples to the

laboratory or courier service. One copy of the completed COC form will be kept by the field team, and the original COC form will be stored in a resealable plastic bag and transported in the sample container with the laboratory samples. Custody seals will be placed along the seal of each sample container in order to prevent tampering with the samples. A copy of the COC form is included in Attachment A2.

8.0 DATA VALIDATION

Data validation is the procedure of reviewing data against a known set of criteria to verify data validity prior to its use. Data validation procedures have been developed by the US EPA to standardize the validation process for analytical results for both water-quality and soil-quality investigations and are documented as the *US EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review,* US EPA, Office of Solid Waste and Emergency Response, Washington, D.C., Publication 9240.1-48, US EPA-540/R-08-01 (US EPA 2008). The Functional Guidelines are intended to be used as a guide for evaluation of data generated under statements of work for organic and inorganic analyses associated with the US EPA Contract Laboratory Program (CLP). The Functional Guidelines also provide general data validation guidelines that can be applied to data generated by non-CLP analytical methods.

One hundred percent (100%) of the analytical data for soil and groundwater investigation samples will be validated using EPA Stage 4 data validation level. Stage 4 validation includes an examination of sample and QC raw data and instrument printouts to check for technical, calculation, analyte identification, analyte quantitation, and transcription or reduction errors. At a minimum 10% of reported results on summary forms should be confirmed by recalculation. The data validation staff will review field documents and laboratory data report packages, and if needed, apply data qualifiers to the data. The data reviewer will determine if the project data quality objectives have been met, and will calculate the data completeness for the project.

9.0 QUALITY CONTROL

This SAP has been prepared to provide instructions and guidance to ensure the sample chemical data collected in support of the site soil and groundwater sampling activities are scientifically valid. Indicator hazardous substances at the Site are listed in Table 2. The sections below outline methods and processes to meet these objectives.

9.1 Field Quality Control Samples

To evaluate quality control (QC), two types of QC samples will be collected (trip blank and blind field duplicate). One trip blank will be collected daily and the field duplicate samples will be collected at a frequency of 5 percent of the samples for each matrix (soil and groundwater).

Two trip blank vials provided by the laboratory will be placed into the cooler designated to store samples to be analyzed for VOCs to evaluate the potential for cross-contamination. The trip blanks will be analyzed for TPH using method NWTPH-Gx and for BTEX and MTBE using EPA Method 8260B. Field duplicates are replicate samples collected at the same location during the same sampling session (roughly at the same time). The field duplicate samples will be collected

in the same container types and handled and analyzed in the same manner, as all other soil and groundwater samples. The field duplicates will be analyzed for the same analytes as the primary sample.

9.2 Laboratory Quality Control Samples

Laboratory QC samples are analyzed as part of standard laboratory practice. The laboratory monitors the precision and accuracy of the results of its analytical procedures through analysis of QC samples. In part, laboratory QC samples consist of Matrix Spike/Matrix Spike Duplicate (MS/MSD) samples for organic analyses, and MS/MSD for inorganic analyses. The term "matrix" refers to use of the actual media collected in the field (e.g., routine soil and water samples). Laboratory QC samples are an aliquot (subset) of the field sample. They are not separate samples, but a special designation of an existing sample. The laboratory QC samples will be analyzed for the same analytes as the standard samples.

9.3 Field Variances

As conditions in the field may vary, it may become necessary to implement minor modifications to the sampling as presented in this plan. When appropriate, ExxonMobil, ADC, and Ecology will be notified and a verbal (followed by a written verification) approval will be obtained before implementing the changes. Modifications to the approved plan will be documented in the sampling project report.

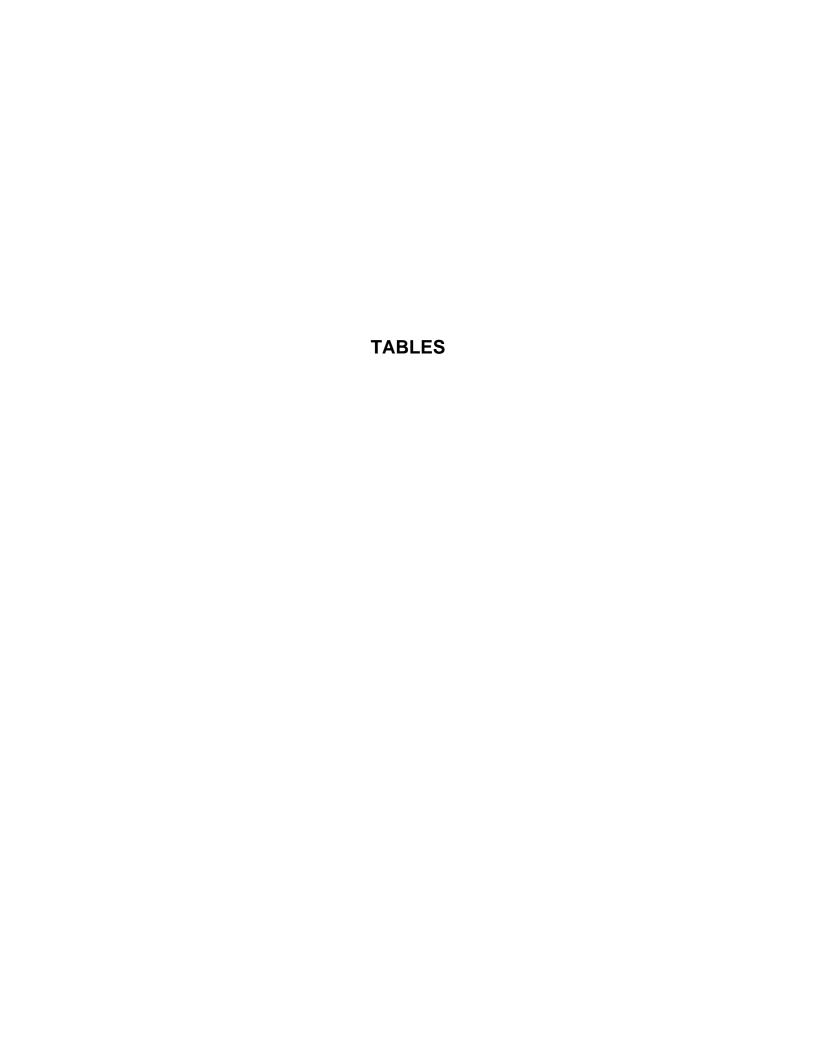
9.4 Data Management

Data management will commence during the field investigation. Each soil and groundwater sample collected will be recorded on field logs, which will include a description of the location, depth, matrix, sample ID, and date and time of collection. All data submittals will be consistent with Ecology Policy 840 (dated March 31, 2008) Environmental Information Management (EIM) submittal requirement format. Once data have been provided by the laboratory, the electronic deliverables will be reviewed to ensure the receipt of all requested analytes and again cross-checked with COCs.

10.0 REFERENCES

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Data Quality Objectives Table 1

					Surrogate	Duplicate	Matri	x Spike	Blan	k Spike	
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS#
				SOIL							
NWTPH-Gx											
NWTPH-Gx	Gasoline Range Hydrocarbons	0.5	5.00	mg/kg dry wt	-	50	10-145	50	80-120	50	8006-61-9
NWTPH-Gx	a,a,a-Trifluorotoluene			Surrogate	50-150	-	-	-	-	-	98-08-8
NWTPH-Dx (w/o	Acid/Silica Gel Clean-up)										
NWTPH-Dx	Diesel Range Hydrocarbons	2.00	4.00	mg/kg dry wt	-	48	10-154	48	55-123	48	68476-34-6
NWTPH-Dx	Lube Oil Range Hydrocarbons	2.00	4.00	mg/kg dry wt	-	39	19-146	39	57-128	39	NA
NWTPH-Dx	o-Terphenyl			Surrogate	50-150	-	-	-	-	-	84-15-1
Extractable Petr	oleum Hydrocarbons										
WA MTCA-EPH	C8-C10 Aliphatics	1.90	5.00	mg/kg dry wt	-	25	50-150	25	50-150	25	NA
WA MTCA-EPH	C10-C12 Aliphatics	1.00	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C12-C16 Aliphatics	1.40	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C16-C21 Aliphatics	2.00	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C21-C34 Aliphatics	3.20	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C8-C10 Aromatics	2.50	5.00	mg/kg dry wt	-	25	50-150	25	50-150	25	NA
WA MTCA-EPH	C10-C12 Aromatics	0.60	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C12-C16 Aromatics	1.70	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C16-C21 Aromatics	3.10	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C21-C34 Aromatics	4.40	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C-35			Surrogate	60-140	-	-	-	-	-	94-36-0
WA MTCA-EPH	o-Terphenyl			Surrogate	60-140	-	-	-	-	-	84-15-1
WA MTCA-EPH	2-Fluorobiphenyl			Surrogate	60-140	-	-	-	-	-	321-60-8
WA MTCA-EPH	2-Bromonaphthalene			Surrogate	60-140	-	-	-	-	-	580-13-2
WA MTCA-EPH	1-Chlorooctadecane			Surrogate	60-140	-	-	-	-	-	3386-33-2
Volatile Petroleu	ım Hydrocarbons		·•	-	-		•				-
WA MTCA-VPH	C5-C6 Aliphatics	2.00	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C6-C8 Aliphatics	0.90	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C8-C10 Aliphatics	2.25	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C10-C12 Aliphatics	3.65	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C8-C10 Aromatics	2.40	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C10-C12 Aromatics	0.30	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C12-C13 Aromatics	0.50	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	2,5-Dibromotoluene (FID)			Surrogate	70-130			-	-	-	615-59-8
WA MTCA-VPH	2,5-Dibromotoluene (PID)			Surrogate	70-130	_		-	-	-	615-59-8

Data Quality Objectives Table 1

					Surrogate	Duplicate	Matri	x Spike	Blan	k Spike	
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS#
				SOIL (conti	nued)						
Volatile Organic	Compounds (Selected List)				•						•
EPA 8260B	Benzene	0.67	2.00	μg/kg dry wt	-	50	42-141	50	78-126	50	71-43-2
EPA 8260B	1,2-Dibromethane (EDB)	0.52	2.00	μg/kg dry wt	-	45	30-155	45	30-155	45	106-93-4
EPA 8260B	1,2-Dichloroethane (EDC)	0.67	2.00	μg/kg dry wt	-	50	32-155	50	70-139	50	107-06-2
EPA 8260B	Ethylbenzene	0.67	2.00	μg/kg dry wt	-	50	21-165	50	79-130	50	100-41-4
EPA 8260B	n-Hexane	0.45	10.000	μg/kg dry wt	-	48	10-180	48	55-136	48	110-54-3
EPA 8260B	Toluene	0.400	2.00	μg/kg dry wt	-	50	45-145	50	76-126	50	108-88-3
EPA 8260B	Total Xylenes	1.30	5.00	μg/kg dry wt	-	50	31-159	50	80-130	50	1330-20-7
Polynuclear Aro	matic Hydrocarbons by GC/MS	S-SIM									
EPA 8270C-SIM	Acenaphthene	0.0003	0.00333	mg/kg dry wt	-	32	42-120	32	44-120	40	83-32-9
EPA 8270C-SIM	Acenaphthylene	0.0004	0.00333	mg/kg dry wt	-	34	39-127	34	46-127	34	208-96-8
EPA 8270C-SIM	Anthracene	0.0007	0.00333	mg/kg dry wt	-	31	39-139	31	49-139	40	120-12-7
EPA 8270C-SIM	Benzo(a)anthracene	0.0003	0.00333	mg/kg dry wt	-	43	31-132	43	53-132	43	56-55-3
EPA 8270C-SIM	Benzo(a)pyrene	0.0004	0.00333	mg/kg dry wt	-	41	22-125	41	57-125	41	50-32-8
EPA 8270C-SIM	Benzo(b)fluoranthene	0.0016	0.00333	mg/kg dry wt	-	50	10-147	50	36-140	50	205-99-2
EPA 8270C-SIM	Benzo(k)fluoranthene	0.0003	0.00333	mg/kg dry wt	-	38	23-140	38	49-140	38	207-08-9
EPA 8270C-SIM	Benzo(ghi)perylene	0.0003	0.00333	mg/kg dry wt	-	50	10-151	50	54-139	50	191-24-2
EPA 8270C-SIM	Chrysene	0.0006	0.00333	mg/kg dry wt	-	40	20-139	40	47-139	40	218-01-9
EPA 8270C-SIM	Dibenz(a,h)anthracene	0.0004	0.00333	mg/kg dry wt	-	50	18-150	50	58-141	50	53-70-3
EPA 8270C-SIM	Fluoranthene	0.0004	0.00333	mg/kg dry wt	-	47	29-135	47	34-135	47	206-44-0
EPA 8270C-SIM	Fluorene	0.0005	0.00333	mg/kg dry wt	-	38	38-129	38	47-129	38	86-73-7
EPA 8270C-SIM	Indeno(1,2,3-cd)pyrene	0.0003	0.00333	mg/kg dry wt	-	46	13-146	46	53-142	46	193-39-5
EPA 8270C-SIM	1-Methylnaphthalene	0.0004	0.00333	mg/kg dry wt	-	35	20-120	35	41-120	35	90-12-0
EPA 8270C-SIM	2-Methylnaphthalene	0.0004	0.00333	mg/kg dry wt	-	38	28-124	38	48-121	38	91-57-6
EPA 8270C-SIM	Naphthalene	0.0007	0.00333	mg/kg dry wt	-	36	10-135	36	42-120	36	91-20-3
EPA 8270C-SIM	Phenanthrene	0.0004	0.00333	mg/kg dry wt	-	46	33-134	46	52-134	46	85-01-8
EPA 8270C-SIM	Pyrene	0.0003	0.00333	mg/kg dry wt	-	50	26-153	50	56-144	50	129-00-0
EPA 8270C-SIM	Nitrobenzene-d5			Surrogate	17-120						4165-60-0
EPA 8270C-SIM	2-Flourobiphenyl			Surrogate	14-120						321-60-8
EPA 8270C-SIM	p-Terphenyl-d14			Surrogate	18-120	-	-		-	-	1718-51-0
				GROUNDW	ATER						
NWTPH-Gx											
NWTPH-Gx	Gasoline Range Hydrocarbons	40.0	100.0	μg/L	-	37	58-139	37	65-129	37	8006-61-9
NWTPH-Gx	a,a,a-Trifluorotoluene			Surrogate	50-150	-	-	-	-	-	98-08-8

Data Quality Objectives Table 1

					Surrogate	Duplicate	Matrix	x Spike	Blan	k Spike	
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS#
			GR	OUNDWATER	(continued)						
NWTPH-Dx (w/o	Acid/Silica Gel Clean-up)				•						
NWTPH-Dx	Diesel Range Hydrocarbons	28.0	50.0	mg/L	-	41	10-134	41	50-123	41	68476-34-6
NWTPH-Dx	Lube Oil Range Hydrocarbons	28.0	50.0	mg/L	-	32	18-147	32	49-117	32	NA
NWTPH-Dx	o-Terphenyl			Surrogate	27-150	-	-	-	-	-	84-15-1
Extractable Petr	oleum Hydrocarbons										
WA MTCA-EPH	C8-C10 Aliphatics	3.0	20.0	μg/L	-	25	50-150	25	50-150	25	NA
WA MTCA-EPH	C10-C12 Aliphatics	2.0	10.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C12-C16 Aliphatics	9.0	30.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C16-C21 Aliphatics	12.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C21-C34 Aliphatics	19.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C8-C10 Aromatics	25.0	50.0	μg/L	-	25	50-150	25	50-150	25	NA
WA MTCA-EPH	C10-C12 Aromatics	1.0	10.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C12-C16 Aromatics	3.0	40.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C16-C21 Aromatics	4.0	30.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C21-C34 Aromatics	7.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C-35			Surrogate	60-140						94-36-0
WA MTCA-EPH	o-Terphenyl			Surrogate	60-140	-	-	-	-	-	84-15-1
WA MTCA-EPH	2-Fluorobiphenyl			Surrogate	60-140						321-60-8
WA MTCA-EPH	2-Bromonaphthalene			Surrogate	60-140						580-13-2
WA MTCA-EPH	1-Chlorooctadecane			Surrogate	60-140	-	-	-	-	-	3386-33-2
Volatile Petroleu	ım Hydrocarbons										
WA MTCA-VPH	C5-C6 Aliphatics	1.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C6-C8 Aliphatics	1.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C8-C10 Aliphatics	3.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C10-C12 Aliphatics	0.90	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C8-C10 Aromatics	2.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C10-C12 Aromatics	0.30	50.0	μg/L		25	70-130	25	70-130	25	NA
WA MTCA-VPH	C12-C13 Aromatics	0.30	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	2,5-Dibromotoluene (FID)			Surrogate	70-130	-	-	-	-	-	615-59-8
WA MTCA-VPH	2,5-Dibromotoluene (PID)			Surrogate	70-130	-	-	-	-	-	615-59-8

Data Quality Objectives Table 1

					Surrogate	Duplicate	Matri	x Spike	Blanl	k Spike	
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS#
			GR	OUNDWATER	(continued)						
Volatile Organic	Compounds(Selected List)										
EPA 8260B	Benzene	0.410	1.0	μg/L	-	25	70-130	25	70-130	25	71-43-2
EPA 8260B	1,2-Dibromethane (EDB)	0.460	1.0	μg/L	-	10	70-152	10	80-135	10	106-93-4
EPA 8260B	1,2-Dichloroethane (EDC)	0.350	1.0	μg/L	-	25	72-137	25	70-134	25	107-06-2
EPA 8260B	Ethylbenzene	0.350	1.0	μg/L	-	25	70-130	25	70-130	25	100-41-4
EPA 8260B	n-Hexane	0.230	2.0	μg/L	-	13	39-167	13	70-130	13	110-54-3
EPA 8260B	Toluene	0.350	1.0	μg/L	-	25	70-130	25	70-130	25	108-88-3
EPA 8260B	Total Xylenes	0.730	3.0	μg/L	-	25	70-130	25	70-130	25	1330-20-7
Polynuclear Aro	matic Compounds by GC/MS v	with High Vo	olume Inje	ection							
EPA 8270C-HVI	Acenaphthene	0.029	0.100	μg/L	-	35	25-140	35	43-122	35	83-32-9
EPA 8270C-HVI	Acenaphthylene	0.031	0.100	μg/L	-	31	36-135	31	43-129	31	208-96-8
EPA 8270C-HVI	Anthracene	0.076	0.100	μg/L	-	38	20-145	38	50-125	38	120-12-7
EPA 8270C-HVI	Benzo(a)anthracene	0.018	0.100	μg/L	-	50	10-129	50	50-135	50	56-55-3
EPA 8270C-HVI	Benzo(a)pyrene	0.014	0.100	μg/L	-	50	10-136	50	46-136	50	50-32-8
EPA 8270C-HVI	Benzo(b)fluoranthene	0.044	0.100	μg/L	-	50	10-147	50	37-147	50	205-99-2
EPA 8270C-HVI	Benzo(k)fluoranthene	0.027	0.100	μg/L	-	50	10-135	50	47-135	50	207-08-9
EPA 8270C-HVI	Benzo(ghi)perylene	0.018	0.100	μg/L	-	50	10-145	50	30-145	50	191-24-2
EPA 8270C-HVI	Chrysene	0.020	0.100	μg/L	-	50	10-138	50	47-138	50	218-01-9
EPA 8270C-HVI	Dibenz(a,h)anthracene	0.018	0.100	μg/L	-	50	10-144	50	36-144	50	53-70-3
EPA 8270C-HVI	Fluoranthene	0.018	0.100	μg/L	-	40	28-143	40	51-139	40	206-44-0
EPA 8270C-HVI	Fluorene	0.035	0.100	μg/L	-	39	28-144	39	47-128	39	86-73-7
EPA 8270C-HVI	Indeno(1,2,3-cd)pyrene	0.023	0.100	μg/L	-	50	10-142	50	32-142	50	193-39-5
EPA 8270C-HVI	1-Methylnaphthalene	0.030	0.100	μg/L	-	27	37-126	27	37-126	27	90-12-0
EPA 8270C-HVI	2-Methylnaphthalene	0.028	0.100	μg/L	-	29	29-127	29	41-121	29	91-57-6
EPA 8270C-HVI	Naphthalene	0.028	0.100	μg/L	-	32	24-120	32	38-120	32	91-20-3
EPA 8270C-HVI	Pentachlorophenol	0.460	1.00	μg/L	-	32	34-163	32	34-147	32	87-86-5
EPA 8270C-HVI	Phenanthrene	0.051	0.100	μg/L	-	47	31-142	47	45-133	47	85-01-8
EPA 8270C-HVI	Pyrene	0.024	0.100	μg/L	-	37	10-158	37	50-146	37	129-00-0
EPA 8270C-HVI	Nitrobenzene-d5			Surrogate	27-120	-	-		-	-	4165-60-0
EPA 8270C-HVI	2-Flourobiphenyl			Surrogate	29-120	-	-	-	-	-	321-60-8
EPA 8270C-HVI	p-Terphenyl-d14			Surrogate	13-120	-	-	_	-	-	1718-51-0

Table 1 Data Quality Objectives

					Surrogate	Duplicate	Matri	x Spike	Blanl	k Spike	
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS#
			GR	OUNDWATER	(continued)						
Dissolved Metal	s by EPA 6000/7000 Series Me	thods									
EPA 6020 - Diss	Lead; dissolved	0.10	2.00	mg/L	-	20	75-125	20	80-120	20	7439-92-1
Natural Attenua	tion Parameters										
EPA 300.0	Sulfate	0.11	1.00	mg/L	-	20	80-120	20	90-110	20	14808-79-8
EPA 300.0	Nitrate	0.01	0.10	mg/L	-	20	80-120	20	90-110	20	14797-55-8
EPA 6020	Manganese (total; soluble)	0.60	5.00	mg/L	-	20	75-125	20	80-120	20	7439-96-5
RSK-175	Methane	10.0	26.0	μg/L	70-120	33	46-142	33	80-120	33	74-82-8
EPA 310.1	Alkalinity	5.00	10.0	mg/L	-	20	80-120	20	90-110	20	-

CAS = chemical Abstracts Service

FID = flame ionization detector

MDL = method detection limit

 μ g/L = micrograms per liter

μg/kg = microgram per kilograms

mg/kg = milligram per kilograms

mg/L = milligram perliter

MRL = method reporting limit

PID = photoionization detector

%R = percent Recovery

RPD = relative percent difference

VPH = volatile petroleum hydrocarbons

¹Titration method; no method detection limit

Table 2 Indicator Hazardous Substances

					MTCA Me	thod A	MTCA	Method B
Method	Analyte	MDL	MRL	Unit	Unrestricted	Industrial	Carcinogenic	Noncarcinogenic
Petroleum Hydro	ocarbons by NWTPH-Gx and NV	VTPH-Dx i	n Soil					
NWTPH-Gx	Gasoline Range Hydrocarbons	1.40	5.00	mg/kg dry wt	30/100 ¹	30/100 ¹	NR	NR
NWTPH-Dx	Diesel Range Hydrocarbons	2.00	10.0	mg/kg dry wt	2,000	2,000	NR	NR
NWTPH-Dx	Lube Oil Range Hydrocarbons	4.00	25.0	mg/kg dry wt	2,000	2,000	NR	NR
Volatile Organic	Compounds per EPA Method 8	260B in Sc	oil					
EPA 8260B	Benzene	0.0004	0.0015	μg/kg dry wt	0.03	0.03	18	320
EPA 8260B	Toluene	0.0004	0.0015	μg/kg dry wt	7	7	NR	6,400
EPA 8260B	Ethylbenzene	0.0004	0.004	μg/kg dry wt	6	6	NR	800
EPA 8260B	Total Xylenes	0.0015	0.01	μg/kg dry wt				
EPA 8260B	Methyl tert-butyl ether	0.0006	0.001	μg/kg dry wt				
EPA 8260B	1,2-Dichloroethane (EDC)	0.0006	0.00125	μg/kg dry wt	NoD	NoD	11	1,600
EPA 8260B	1,2-Dibromoethane (EDB)	0.0006	0.005	μg/kg dry wt				
EPA 8260B	n-Hexane	0.0008	0.005	μg/kg dry wt				
Polynuclear Aron	matic Hydrocarbons by GC/MS	-SIM in Soi	il					
EPA 8270C-SIM	Acenaphthene	0.00170	0.0100	mg/kg dry wt	NoD	NoD	NR	4,800
EPA 8270C-SIM	Acenaphthylene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	Anthracene	0.00170	0.0100	mg/kg dry wt	NoD	NoD	NR	24,000
EPA 8270C-SIM	Benzo(a)anthracene	0.00170	0.0100	mg/kg dry wt	2	0.1	NR	NR
EPA 8270C-SIM	Benzo(a)pyrene	0.00170	0.0100	mg/kg dry wt	2	0.1	0.14	NR
EPA 8270C-SIM	Benzo(b)fluoranthene	0.00170	0.0100	mg/kg dry wt	2	0.1	Tef	NR
EPA 8270C-SIM	Benzo(k)fluoranthene	0.00170	0.0100	mg/kg dry wt	2	0.1	Tef	NR
EPA 8270C-SIM	Benzo(b & k)fluoranthene	0.00330	0.0200	mg/kg dry wt				
EPA 8270C-SIM	Benzo(ghi)perylene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	Chrysene	0.00170	0.0100	mg/kg dry wt	2	0.1	Tef	NR
EPA 8270C-SIM	Dibenz(a,h)anthracene	0.00170	0.0100	mg/kg dry wt	2	0.1	Tef	NR
EPA 8270C-SIM	Fluoranthene	0.00170	0.0100	mg/kg dry wt	NoD	NoD	NR	3,200
EPA 8270C-SIM	Fluorene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	Indeno(1,2,3-cd)pyrene	0.00170	0.0100	mg/kg dry wt	2	0.1	Tef	NR
EPA 8270C-SIM	1-Methylnaphthalene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	2-Methylnaphthalene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	Naphthalene	0.00170	0.0100		5	5	NR	1,600
EPA 8270C-SIM	Pentachlorophenol	0.0023	0.01	mg/kg dry wt				
EPA 8270C-SIM	Phenanthrene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	Pyrene	0.00170	0.0100	mg/kg dry wt	NoD	NoD	NR	24,000

Table 2 Indicator Hazardous Substances

					MTCA Method A	MTCA	Method B
Method	Analyte	MDL	MRL	Unit	Unrestricted	Carcinogenic	Noncarcinogenic
Petroleum Hydro	carbons by NWTPH-Gx and NV	VTPH-Dx ii	n Water				
NWTPH-Gx	Gasoline Range Hydrocarbons	38.0	50.0	μg/L	800/1000 ¹	NR	NR
NWTPH-Dx	Diesel Range Hydrocarbons	2.00	10.0	μg/L	500	NR	NR
NWTPH-Dx	Lube Oil Range Hydrocarbons	4.00	25.0	μg/L	500	NR	NR
Volatile Organic	Compounds by EPA Method 82	260B in Wa	iter				
EPA 8260B	Benzene	0.0470	0.200	μg/L	5	0.8	32
EPA 8260B	Toluene	0.0210	0.200	μg/L	1,000	NR	640
EPA 8260B	Ethylbenzene	0.0660	0.200	μg/L	700	NR	800
EPA 8260B	Total Xylenes	0.247	0.750	μg/L	1,000	NR	1,600
EPA 8260B	Methyl tert-butyl ether	0.0930	1.00	μg/L	20	24	6,900
EPA 8260B	1,2-Dichloroethane (EDC)	0.0420	0.200	μg/L	5	0.48	160
EPA 8011	1,2-Dibromoethane (EDB)	0.600	5.00	μg/L	0.01	0.00051	NR
EPA 8260B	n-Hexane	0.129	1.00	μg/L	NoD	NR	480
Polynuclear Aron	matic Compounds by GC/MS w	ith High Vo	olume Injec	tion in Water			
EPA 8270C-HVI	Acenaphthene	0.00600	0.100	μg/L	NoD	NR	160
EPA 8270C-HVI	Acenaphthylene	0.00700	0.100	μg/L			
EPA 8270C-HVI	Anthracene	0.00900	0.100	μg/L	NoD	NR	4,800
EPA 8270C-HVI	Benzo(a)anthracene	0.00500	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	Benzo(a)pyrene	0.00600	0.0100	μg/L	0.1	0.012	NR
EPA 8270C-HVI	Benzo(b)fluoranthene	0.00600	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	Benzo(k)fluoranthene	0.00600	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	Benzo(ghi)perylene	0.00700	0.100	μg/L			
EPA 8270C-HVI	Chrysene	0.00600	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	Dibenz(a,h)anthracene	0.00500	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	Fluoranthene	0.00900	0.100	μg/L	NoD	NR	640
EPA 8270C-HVI	Fluorene	0.00800	0.100	μg/L	NoD	NR	640
EPA 8270C-HVI	Indeno(1,2,3-cd)pyrene	0.00600	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	1-Methylnaphthalene	0.00600	0.100	μg/L	NR	NR	NR
EPA 8270C-HVI	2-Methylnaphthalene	0.00800	0.100	μg/L	NR	NR	32
EPA 8270C-HVI	Naphthalene	0.00600	0.100	μg/L	160	NR	160
EPA 8270C-SIM	Pentachlorophenol	0.0068	0.01	μg/L	NoD	0.73	480
EPA 8270C-HVI	Phenanthrene	0.00800	0.100	μg/L	NR	NR	NR
EPA 8270C-HVI	Pyrene	0.00700	0.100	μg/L	NoD	NR	480

Table 2 Indicator Hazardous Substances

					MTCA Method A	MTCA Method B					
Method	Analyte	MDL	MRL	Unit	Unrestricted	Carcinogenic	Noncarcinogenic				
Dissolved Metals	Dissolved Metals by EPA 6000/7000 Series Methods in Water										
EPA 6020 - Diss	Dissolved Lead	0.000900	0.00100	mg/L	15	NR	NR				

Notes:

TPH gasoline with benzene present/TPH gasoline without benzene present MTCA = Model Toxics Control Act
 NoD = No data

NOD = No data
NR = Not researched
μg/kg = microgram per kilogram
μg/L = microgram per liter
mg/kg = milligram per kilogram
mg/L = milligram per liter

Tef = Toxic equivalency factor

Table 3 Soil and Groundwater Sampling Locations

Sample	Soil	Drilling	Maximum	No. of Soil	Screen	No. of Groundwater
Location	Sample Label	Method	Depth (feet)	Samples	Elevation ¹	Samples
Soil Borings						
AP-1	AP-1-(depth in feet)	Direct push	15	2	N/A	0
AP-2	AP-2-(depth in feet)	Direct push	15	2	N/A	0
AP-3	AP-3-(depth in feet)	Direct push	15	2	N/A	0
AP-4	AP-4-(depth in feet)	Direct push	15	2	N/A	0
AP-5	AP-5-(depth in feet)	Direct push	15	2	N/A	0
AP-6	AP-6-(depth in feet)	Direct push	15	2	N/A	0
AP-7	AP-7-(depth in feet)	Direct push	15	2	N/A	0
Duplicate soil sample ²	DUP-S-1			1		
AB-1	AB-1-(depth in feet)	HSA	35	2	N/A	0
AB-2	AB-2-(depth in feet)	HSA	35	2	N/A	0
AB-3	AB-3-(depth in feet)	HSA	35	2	N/A	0
AB-4	AB-4-(depth in feet)	HSA	35	2	N/A	0
AB-5	AB-5-(depth in feet)	HSA	35	2	N/A	0
AB-6	AB-6-(depth in feet)	HSA	35	2	N/A	0
AB-7	AB-7-(depth in feet)	HSA	35	2	N/A	0
MW-A7	MW-A7-(depth in feet)	HSA	35	2	N/A	0
Duplicate soil sample ²	DUP-S-2			1		
Monitoring Wells						
MW-A3	MW-A3-(depth in feet)	HSA	15	2	0 to 10	4
MW-A4	MW-A4-(depth in feet)	HSA	15	2	0 to 10	4
MW-A5	MW-A5-(depth in feet)	HSA	15	2	0 to 10	4
MW-A6	MW-A6-(depth in feet)	HSA	15	2	0 to 10	4
MW-A7	(3)	HSA	15	(3)	0 to 10	4
Duplicate groundwater sample ⁴	DUP-GW-1					4
Total Samples				40		24

- 1. Approximate elevation in feet above mean sea level.
- 2. Duplicate samples will be collected from intervals exhibiting evidence of potential contamination, such as staining or odor.
- 3. Soil samples for this boring are listed under soil borings.
- 4. A duplicate groundwater sample will be collected each quarter.

HSA = hollow-stem auger N/A = not applicable

Table 4 Sample Containers, Preservation and Storage

Analysis	Method	Sample Container	Number of Containers	Preservation and Storage	Holding Times
Soil	•				
Hydrocarbon Identification	NWTPH-HCID	8 oz. CWM jar with PTFE lid	1	4° C	14 days
Gasoline Range Organics	NWTPH-Gx	VOA vial w/MeOH	1	10 mL MeOH	14 days
Diesel Range Organics ¹	NWTPH-Dx	8 oz. CWM jar ² with PTFE lid	1	4° C	14 days
EPH	MTCA-NW EPH	8 oz. CWM jar ² with PTFE lid	1	HCl pH<2; 4° C	14 days
VPH	MTCA-NW VPH	8 oz. CWM jar ² with PTFE lid	1	HCl pH<2; 4° C	14 days
Volatile Organic Compounds ^{3,4}	EPA 8260B	VOA vial w/stir bar ⁵	2	Freeze within 48 hrs	14 days
Polycyclic Aromatic Hydrocarbons	EPA 8270D	8 oz. CWM jar ² with PTFE lid	1	4° C	14 days
Water					
Gasoline Range Organics	NWTPH-Gx	VOA vial w/MeOH	3	HCl pH<2, 4° C	14 days
Diesel Range Organics	NWTPH-Dx	500-mL amber bottle	2	HCl pH<2, 4° C	14 days
Volatile Organic Compounds ^{3,4}	EPA 8260B ⁶	VOA vial	3	HCl pH<2, 4° C	14 days
Polycyclic Aromatic Hydrocarbons	EPA 8270D	1-Liter Amber	2	None	7 days
Dissolved Lead ⁷	EPA 6020	500-mL polyethylene	1	None	180 days ⁸

- 1. Silica gel cleanup will be performed on samples where the chromatograph indicates a possible biogenic influence.
- 2. Sample fraction would come from the same 8 oz jar that was collected for NWTPH-HCID.
- 3. Includes benzene, toluene, ethylbenzene, total xylenes, and methyl tertiary-butyl ether.
- 4. Includes 1,2-dichloroethane, 1,2-dibromoethane, and n-hexane for selected samples that appear to be contaminated based on field screening.
- 5. Sample volume = 5 ounces
- 6. 1,2-Dibromoethane will be analyzed using EPA Method 8011.
- 7. Sample to be filtered in the lab.
- 8. Sample must be filtered within 48 hours of collection for this holding time to apply.

CWM jar = Clear, wide-mouth glass jar

EPH = Extractable petroleum hydrocarbons

HCI = Hydrochloric acid

MeOH = Methanol

PTFE = teflon

VOA = volatile organic analysis

VPH = Volatile petroleum hydrocarbons

		Sample Container	Number of	Preservation	Holding
Geotechnical Parameter	Analytical Method	and Volume	Containers	and Storage	Time
Fraction organic carbon	Organic content burn	5-gallon bucket	2	None	180 days
Soil bulk density	Unit weight/volume	5-gallon bucket	2	None	180 days
Total soil porosity	(1)	5-gallon bucket	2	None	180 days
Volumetric water content	(2)	5-gallon bucket	2	None	180 days
Permeability		Shelby tube	1	Seal ends and store upright	180 days
Volumetric air content		5-gallon bucket	2	None	180 days

- 1. Calculated w/ bulk density and particle density.
- 2. Calculated w/ gravimetric water content.

Table 6 Natural Attenuation Parameter Sampling Containers, Preservation, and Storage

Natural Attenuation Parameter Analysis ¹	Method	Sample Container	Number of Containers	Preservation and Storage	Holding Time
Dissolved oxygen (DO)	Field-measured	N/A	N/A	N/A	N/A
Oxidation-reduction potential (ORP)	Field-measured	N/A	N/A	N/A	N/A
рН	Field-measured	N/A	N/A	N/A	N/A
Specific conductance	Field-measured	N/A	N/A	N/A	N/A
Temperature	Field-measured	N/A	N/A	N/A	N/A
Sulfate	EPA 300.0	500 mL unpreserved polyethylene	1	none	28 days
Nitrate	EPA 300.0	500 mL unpreserved polyethylene	1	none	2 days
Ferrous iron (soluble)	Field-measured	N/A	N/A	N/A	N/A
Manganese (soluble)	EPA 6020	500 mL HNO ₃ polyethylene	1	HNO ₃	180 days
Methane	RSK175	40 mL HCl Vials	3	HCI	14 days
Alkalinity	EPA 310.1	500 mL unpreserved polyethylene	1	none	14 days

¹Ecology, 2005

HCI = hydrochloric acid

 $HNO_3 = nitric acid$

NA = not applicable

VOAs = volatile organic analysis

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Table 7 Tidal Study Well Specifications

Well No.	Date Installed	Well Depth (feet)	Screened Interval (feet)	TOC Elevation ¹	Depth to Water ²	Groundwater Elevation ³	Summary of Lithology
W-3	Feb-90	22.9 ⁴	3 to 23	13.27	5.88	7.39	sand; H ₂ S odor
W-6	Feb-90	6.54		14.95	2.83	12.12	sand; organic clay;H ₂ S odor
MW-11	Mar-88	18.72 ⁴	NS in log	16.28	2.71	13.57	sand (fill); peat
MW-19	Mar-91	5.26 ⁴	NS in log	12.79	2.76	10.03	sand
MW-28	June-91	12.18 ⁴	2.5 to 11.5	13.86	1.25	12.61	silty sand; peat
MW-40R	No log	12.51 ⁴	No log	15.56	3.35	12.21	No log
MW-A1	Feb-08	15.5	5.5 to 15.5	14.07	7.18 ⁵	6.89	sand & gravel (fill)
MW-A2	Feb-08	15.5	5.5 to 15.5	12.56	5.82 ⁵	6.74	sand & silt (fill)
MW-A3	TBI	TBD	25 to 35 ⁶	TBD	TBD	TBD	TBD
MW-A4	TBI	TBD	25 to 35 ⁶	TBD	TBD	TBD	TBD
MW-A5	TBI	TBD	25 to 35 ⁶	TBD	TBD	TBD	TBD
MW-A6	TBI	TBD	25 to 35 ⁶	TBD	TBD	TBD	TBD
MW-A7	TBI	TBD	25 to 35 ⁶	TBD	TBD	TBD	TBD

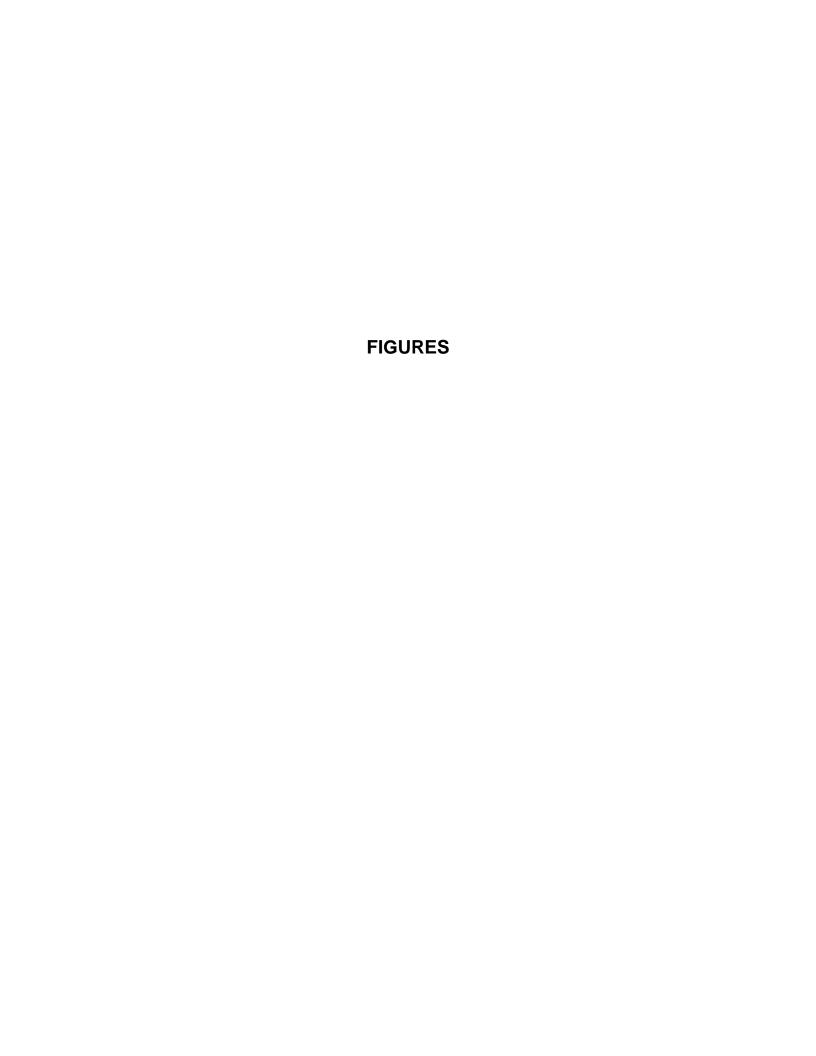
- 1. TOC elevation is in feet above mean sea level.
- 2. Depth to water in feet below ground surface measured prior to installation of pressure transducer on February 21, 2008.
- 3. Groundwater elevation is in feet above mean sea level measured prior to installation of pressure transducer on February 21, 2008.
- 4. Total depth of well measured on February 21, 2008.
- 5. Depth to water measured on February 24, 2009.
- 6. Screened interval depth is approximate as wells have not been installed.

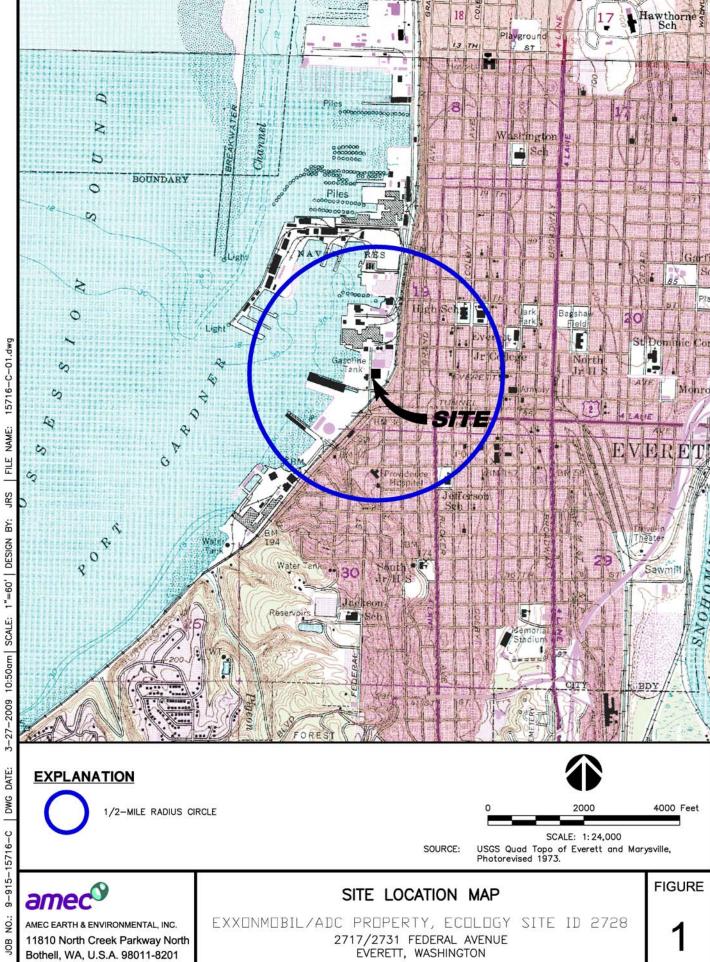
 H_2S = hydrogen sulfide

NS = Not specified

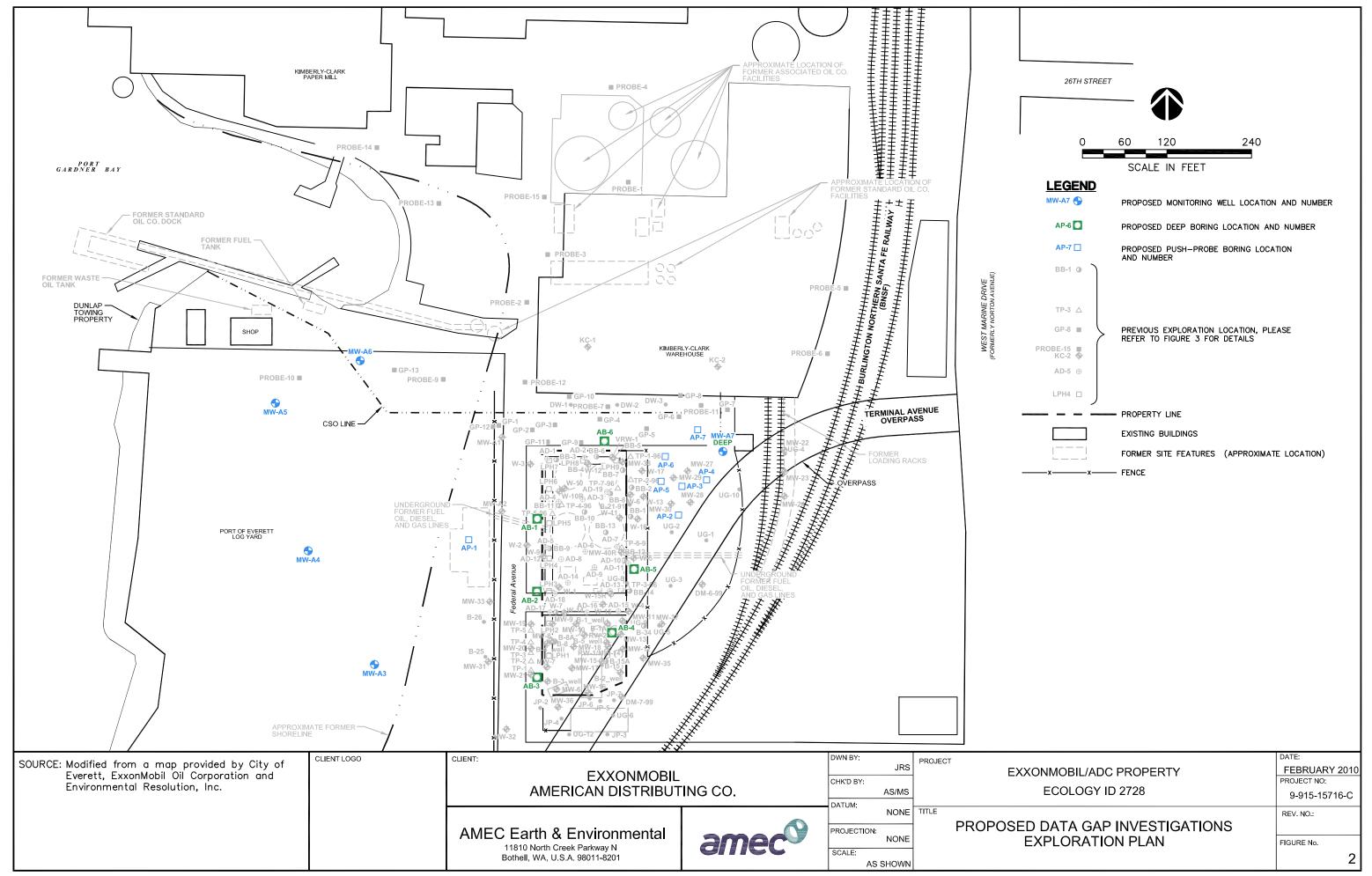
TBI = To be installed

TBD = To be determined





NO.:



ATTACHMENT A1

Site-Specific Health and Safety Plan





Site Safety Plan: Updated 09.01.09

Project Name: Site Former Mobile Oil Terminal 46-108, Everett, Washington

SITE SPECIFIC HEALTH AND SAFETY PLAN

Project Name: ExxonMobil/ADC Property, Ecology Site ID 2728

Project Location: 2717/2731 Federal Avenue, Everett, Washington

Project Number: 9-91-51571-6C

THIS SITE SPECIFIC HEALTH AND SAFETY PLAN APPLIES ONLY TO AMEC PERSONNEL.

All site personnel must have completed the 8-hour ExxonMobil LPS Training prior to undertaking any field work at the site.

A PRE-ENTRY BRIEFING MUST BE HELD PRIOR TO INITIATING ANY SITE ACTIVITY AND AT OTHER TIMES AS NECESSARY TO ENSURE EMPLOYEES ARE APPRISED OF THE SITE HEALTH AND SAFETY PLAN.

SAFETY PERSONNEL:

Health and Safety Coordinators:

Project Engineers:

Leah Vigoren and Anastasia Speransky
Leah Vigoren and Stephen Dailey
Meg Strong and Gary Dupuy

Site Safety Coordinator (SSC): Leah Vigoren

Client Contact: Joe Abel: ExxonMobil Environmental Services (EMES)

EMERGENCY CONTACTS:

Hospital / Emergency Room: Providence Medical Center 425-258-7555

Map showing shortest route to Hospital is attached to this document.

Fire: 911
Police: 911
Poison Control Center: 1-800-222-1222
Emergency Water Shut-off: Everett 1-425-257-8821
Electric Utility: Snohomish County PUD 1-877-783-1000
Washington State Patrol: 911

Health and Safety Coordinator: Leah Vigoren (Cell Phone: 206-351-9449)

Project Manager: Meg Strong (Cell Phone: 425-864-2096)

206-342-1760 (w)
425-368-0966 (w)

AMEC Earth & Environmental, Inc. 11810North Creek Parkway Bothell, Washington USA 98011 (425) 368-1000 Phone (425) 368-1001 Facsimile



Site Safety Plan: Updated 09.01.09 Project Number: 9-91-51571-6C

SITE HISTORY

The approximate 1-acre site was purchased by ExxonMobil's historic predecessors in 1922, and was utilized as a petroleum bulk storage distribution facility between 1922 and 1974. In 1974, the then Mobile Company sold two thirds of the site (northern portion) to A.P. Miller (Miller), for use by the American Distributing Company (ADC). In 1987, Mobile discontinued petroleum storage and dispensing operations on their portion of the site and removed all storage tanks and ancillary equipment. In 1990, petroleum distribution was discontinued on the ADC parcel, and some improvements and tanks were removed from the parcel. Since then, the site has been turned into a parking lot and is leased to the Kimberly Clark facility located to the north of the site. Activities that have occurred on the site since this time have been environmental investigations and remedial activities to address petroleum impacts to soil and groundwater.

In 1985, site characterization activities were initiated to define the nature and extent of petroleum impacts beneath the site. Between 1988 and 1996, a variety of Interim Remedial Action Measures (IRAMs) were implemented to address the free product. In 1998, a Remedial Investigation/Focused Feasibility Study (RI/FFS) was performed in coordination of the Washington State Department of Ecology (Ecology) under the Consent Order. Remedial Action Objectives (RAOs) were developed for the site based on the RI data and baseline human health risk assessment. The remedy selected to achieve RAOs included the following.

- Construction of an interceptor trench along the down gradient margins of the site (entire western and northern boundaries) to mitigate the off-site migration of the light non-aqueous phase liquid (LNAPL) present on the shallow water table.
- Placement of low-permeability cap across the entire site surface

Project Name: Site Former Mobile Oil Terminal 46-108, Everett, Washington

- Ongoing removal and disposal of recovered LNAPL from site monitoring wells and interceptor trench; and
- Quarterly groundwater monitoring.

ORGANIZATIONAL STRUCTURE

Project Manager(s):

Gary Dupuy (phone number 206-342-1777) and Meg Strong (phone number 425-368-0966) are the client managers for the project. Responsibilities include remaining in contact with regulatory agencies such as the Department of Ecology, overseeing the Project and ensuring client satisfaction from commencement to closeout.

Site Safety and Health Supervisor:

Leah Vigoren (phone number 206-838-8470) and Anastasia Speransky (phone number 206-838-1776) are the acting Health and Safety Coordinators (HSCs). Primarily the duties of the HSC entail coordination with the Project manager for preparation of site health and safety plans, assessment of chemical hazards and selection of safety / monitoring equipment.

The HSC will also take on the duties of the Site Safety Coordinator. The SSC has the responsibility of implementing the Site Health and Safety Plan while at the Site. The SSC / HSC will be involved with the Project Manager in preparation of the Site Health and Safety Plan. If the plan is not being implemented or if unanticipated situations arise, the SSC / HSC may stop all proceedings and see that all personnel depart the site. The SSC / HSC will have charge of all instruments and see to their proper use and function.



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Project Name: Site Former Mobile Oil Terminal 46-108, Everett, Washington

Project Name : Site Former Mobile Oil Terminal 46-108, Everett, Washington

Project Engineer:

Stephen Dailey (phone number 206-342-1775) is the project engineer and is responsible for developing the site conceptual model and providing engineering input to the FFS.

Field Technicians:

Joseph C. Petrick, and Danah Palik are the Field Technicians whose responsibilities include obtaining groundwater samples and other data, as required, from monitoring wells. Keeping field records (I.e. Daily Field Logs) describing field activities, observations and site events. Supplying daily reports and reporting all incidents to the Project Engineer.

Subcontractor

Transport and disposal company (Clear Harbors: AWSL Subcontractor) is responsible for removing all waste from the jobsite and transferring it to a certified facility for disposal.

Drilling company "Cascade Drilling, Inc." is responsible for the advancement of soil borings and the installation of monitoring wells on the site.

ON SITE TASKS

AMEC to remove light non-aqueous phase liquid (LNAPL) monthly and continue the quarterly groundwater monitoring program at the site. Groundwater samples will be collected and analyzed for diesel and heavy oil range organics using Method Northwest Total Petroleum Hydrocarbons Diesel Extended (NWTPH: NWTPH-D, which includes NWTPH-oil (O)) with Silica Gel clean-up), gasoline range organic compounds using Method NWTPH-gasoline Extended (Gx), and benzene, toluene, ethyl benzene, and total xylenes (BTEX) using U.S. Environmental Protection Agency (EPA) Method 8260B.

During monthly O&M events LNAPL is collected by AMEC personnel and stored in two 55-gallon drums within a secured shed on the project site. To mitigate spill hazards, and possible drum failure, these drums are placed on a secondary containment platform which would collect any spilled free liquids. When the drums are full a certified waste transporter and disposal company (ASWL Subcontractor) is contacted to transport the drums for disposal.

AMEC will oversee the advancement of 18 soil borings and the installation of 5 new monitoring wells on the site. Cascade Drilling of Woodinville Washington will conduct the drilling on the site and provide all equipment and personnel necessary. This work will require utility clearances prior to the initiation of drilling. Drilling involves the use of heavy equipment which will require safety precautions during set up and operation. Drilling and sampling at the site brings potentially-contaminated subsurface materials to the surface where Cascade drilling personnel or AMEC personnel overseeing the drilling may be exposed. Soil samples will be collected from each soil boring; a total of 2 samples per boring will be submitted for analyses including NWTPH-Dx, NWTPH-Gx, and BTEX by 8260B. After monitoring well installation, the 5 new wells will be sampled as part of AMEC's ongoing quarterly groundwater monitoring program at the site.

AMEC will be conducting a tidal influence study in which a stilling well will need to be installed on a portion of the Everett pier. The stilling well will need to extend into the water such that the lower portion of it is always submerged. The tidal influence study will consist of programming and installing pressure transducers and data loggers in approximately 12 monitoring wells which will measure water level fluctuations which will be analyzed for the presence and extent of tidal influence.

Site Safety Plan: Updated 09.01.09 Project Number: 9-91-51571-6C Project Name: Site Former Mobile Oil Terminal 46-108, Everett, Washington

SAFETY & HEALTH HAZARDS ANALYSIS

a) Physical Hazards

Physical hazards that may be encountered during site activities include noise, manual lifting, powerful moving parts and weather related hazards (cold, heat stress, wind). Hard hats, safety glasses, hearing protection and steel-toed boots will be required for all personnel working in the vicinity of heavy equipment.

Identified hazards may be mitigated by using safe work practices at all times. The SSC has total responsibility for ensuring that all AMEC personnel on-site perform work tasks in a safe and sensible manner. If at any time the SSC determines that safe work practices are not followed, the tasks will be suspended and corrective actions will be taken.

Because of the potential of explosion hazard presented during groundwater monitoring (i.e., W-2) SMOKING WILL NOT BE ALLOWED WITHIN 50 FEET OF THE WORK ZONE.

The following are all additional site related hazards:.

1) Traffic

a. Cones will be set out around the work area and safety reflective vests will be worn.

2) Personnel or property damage from vehicle movement.

- a. When moving vehicles the following precautions must be taken
- b. Equipment must be stowed and secured
- A spotter must be used due to the presence of blind spots in the driver's field of vision.
- d. The spotter must identify any surface obstruction / anomalies
- e. Audible warning signals and hand signals must be used.
- Operator must yield to pedestrians.

3) Personal injury from handling heavy objects.

- a. Use proper lifting techniques; keeping back straight and lift with arms and legs; keep load near body: avoid reaching.
- Do not attempting to lift anything that weighs more than 60 pounds.
- c. Use mechanical equipment such as a cart to carry / lift large, heavy or awkward loads.

Slips, trips and falls.

- a. Scan area prior to start of work.
- b. Group all equipment and waste in one designated area.
- c. Return tools not in use to storage.

5) Pinch points on drum and well covers.

a. Personnel will wear leather gloves when working with well and drum covers.

6) Broken Glassware

- a. Personnel will use bubble wrap and blue ice when transporting samples in glass containers.
- b. Personnel will not overtighten caps on glass bottles.

b) Chemical Hazards

Chemical hazards that could possibly be encountered include Gasoline. BTEX, hydrogen sulfide (H₂S), and methane (CH₄). The Permissible Exposure Limit (PEL) for Gasoline, BTEX, and hydrigen sulfide, and the Threshhold Limit Value (TLV) for methane are listed in the attached table. The nature of this project precludes continuous exposure to any potential contaminant.

Per past anecdotal evidence, monitoring well (MW) 30 occasionlly has contained small amounts of hydrogen sulfide gas. In addition, during installation, well (W) 2 contained methane gas exceeding the lower explosive limit (LEL). AMEC will conduct initial air monitoring using a multi-gas combustible gas





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indicator (CGI) upon opening wells for sampling. Ensure that the atmosphere is less than 10% LEL, contains between 19.5% and 23.5% oxygen, less than 10 parts per million (ppm) H₂S and less than 10 ppm carbon monozide prior to proceeding with sampling. Each well will be continuously monitored during sampling. The CGI will alarm if atmospheric concentrations exceed the levels required for entry. (Subsequent air monitoring for the year following installation indicates that no hazardous amounts of CH₄ have been detected in or nearby W2 since installation.

1) Personal Injury from chemical contact / exposure / inhalation.

- Inspect drums before handling to ensure they are not leaking or bulging, or show any signs of loss of integrity.
- b. AMEC personnel will place themselves upwind when opening monitoring wells.

2) Personal injury from vapor ignition.

a. AMEC personnel will use metal buckets when collecting and moving product.

c) Biological Hazards

The project site is a flat graded parking lot which eliminates most biological hazards. Current biological hazards are limited to the possibility of insects and / or rodents residing within the monitoring wells. AMEC personnel will take caution when opening the wells and will be wearing leather gloves to mitigate this hazard.

TRAINING

All AMEC personnel will review the site specific Heath and Safety plan before accessing the site. Personnel onsite will also have current 40-Hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Certification.

Certificates of HAZWOPER completion will be maintained at the Kirkland office and will be available to regulatory personnel upon request. All Personnel shall carry current 40-hour HAZWOPER training cards or appropriate paperwork while working onsite. The SSC / HSC shall be first aid and CPR trained.

In addition all site personnel must have completed the **8 hour ExxonMobil LPS Training** prior to undertaking any field work.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

AMEC will wear Level D PPE which consists of steel-toed, chemical resistant rubber boots, inner glove of PVC or latex, outer gloves of Nitrile or equivalent, safety glasses, Tyvek coveralls, and a hard hat. During construction activities, minimal PPE hearing protection will consist of soft foam ear-bud style plugs.

MEDICAL SURVEILLANCE

Evidence of a current physical examination in the form of a letter from an examining physician will be maintained at the Bothell office and will be available to regulatory personnel upon request.

Air Monitoring

AMEC will conduct initial air monitoring using a photoionization detector (PID) upon opening wells for sampling. PID utilizes ultaviolet light to ionize gas molecules and is commonly employed in the detection of volatile organic compounds (VOCs). AMEC will ensure that the concentrations of VOCs are less than 5 parts per million (ppm) in breathing zone prior to proceeding with sampling. Each well will be continuously monitored during sampling. The





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PID will alarm if VOC concentrations exceed the levels required for breathing.

AMEC will calibrate the PID both pre and post site visits using Isobutylene calibration gas with compatible regulator.

Air monitoring wil be conducted during drilling and soil sampling activities.

Decontamination

Disposable PPE will be stored in a secured 55-gallon drum onsite. Monthly, a certified waste transporter and disposal company (ASWL Subcontractor) is contacted to transport the drum for disposal.

Water depth meters will be decon'd between depth recordings of individual monitoring wells using a clean metal bucket with distilled water and 1/10 parts cleaning solution.

Site Control

AMEC personnel will be provided with a site map and be required to review the Health and Safety plan prior to entry into the site. A copy of this HASP shall be on hand at all times with emergency contact numbers and directions to the nearest medical facilities easily accessible. When necessary (e.g. quarterly sampling), cones, caution tape or a suitable alternative will be used to deny public access to the work area. Cones will also be used to define an exclusion zone redirecting motorists and pedestrians away from the work area.

In all emergencies AMEC is to document the action taken and notify the HSC, Project Manager and client official of the event and subsequent response.

In the Event of an Injury

If an injury is life-threatening, follow steps 1 though 8 below. If the injury is not life threatening, perform necessary first aid and consider the need for decontamination prior to transport. The SSC shall be first aid and CPR trained.

- 1) Perform first aid necessary to determine victim(s) medical status
- Call emergency transport.
- 3) Give specific directions to location of emergency
- Give phone from which you are calling;
- 5) Tell emergency services what happened. Inform that victim(s) may be wearing contaminated clothing.
- 6) Inform emergency services how many persons need help.
- 7) Inform emergency services what is being done for the victim(s)
- 8) Stay on telephone until told to hang up.

Transport to hospital, if possible.

Work Permits

Copies of the permits will be available onsite during drilling activities. Cascade Drilling will obtain start cards required for drilling from the Washington State Department of Ecology.

Security

No unauthorized persons will be allowed in the work zone. Unauthorized persons are those without appropriate training, without proof of medical surveillance, and those with no business on the site.



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Confined Space Entry Procedures

AMEC will not be entering confined spaces at the Site.

Spill Containment Program

The site specific accidental spill / release action plan consists of the following:

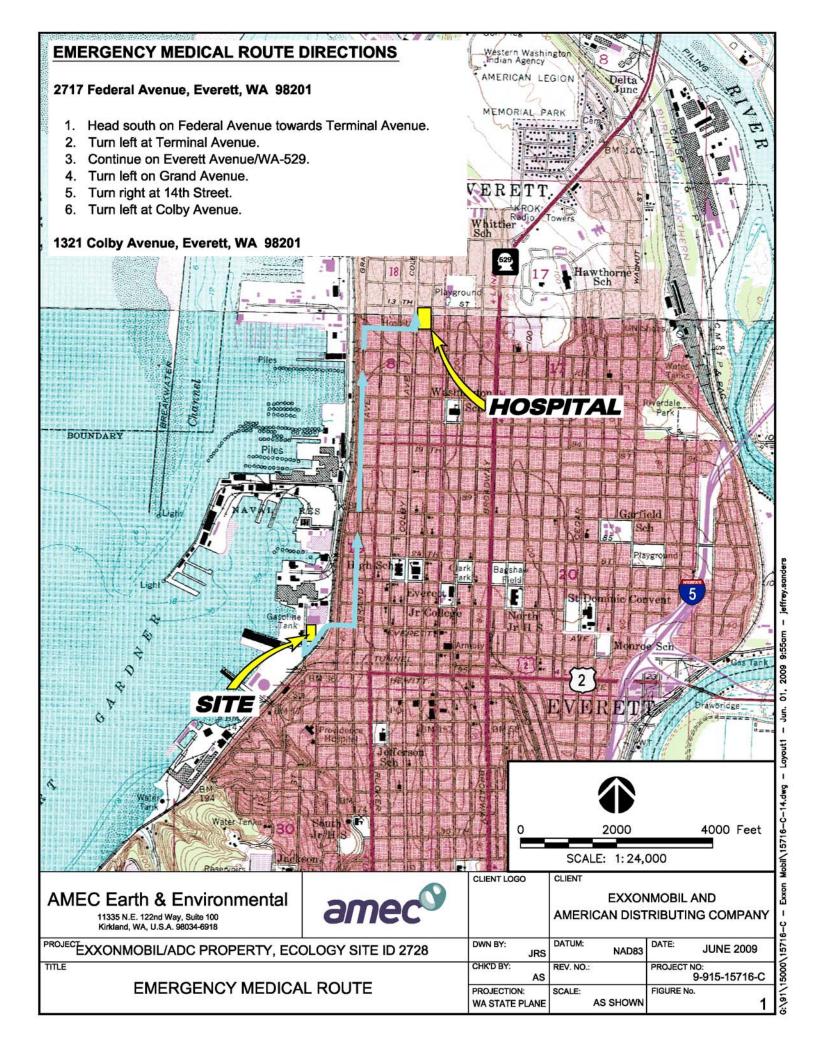
- 1) Pick up, isolate, or contain spill;
- 2) Evacuate area, if necessary;
- 3) Contact emergency agencies, if necessary.

Incident Reporting Requirements

In all emergencies, document action taken and notify the HSC / SSC, Project Manager and client officials of occurrences.

AMEC will report all incidents and Near Loss Incidents (NLI) to the ExxonMobil contact within 24 hours of the occurrence along with a written report and the launching of an accident investigation.

Attendance/Sign-In (name, date)	
	-



ATTACHMENT A2

Field Documentation Forms



AMEC Earth & Environmental, Inc.

 11810 North Creek Parkway N
 Tel
 (425) 368-1000

 Bothell, Washington 98011
 Fax
 (425) 368-1001

DAILY FIELD REPORT

PROJECT NAME		PROJECT NO.	FIELD REPORT NO.
Mobil/ADC Everett Facility		9915-15716-0	
ADDRESS		DATE	PAGE
2717/2731 Federal Avenue			OF
CITY OR COUNTY	PERMIT NO.	ARRIVAL TIME	DEPARTURE TIME
Everett, WA			
CLIENT	AMEC PROJECT MANAGER	R/PHONE NO.	
ExxonMobil			
GENERAL CONTRACTOR	AMEC FIELD REPRESENTA	TIVE/ MOBILE NO.	
SUBCONTRACTOR	WEATHER		
TYPE OF WORK PERFORMED			
EQUIPMENT USED			

COMMENTS

AMEC (REV. 8/00)



LOW-FLOW GROUNDWATER SAMPLING LOG

WELL NO:		LOCATION:					PROJI	ECT NO:	
DATE:		TIME:			CLIMAT	IC CONDITIONS:			
OVA/PID REA	ADING WHEN WEL	L OPENED:			DEPTH	TO PRODUCT (T	OC):		
STATIC WAT	ER LEVEL (TOC):				TOTAL I	DEPTH OF WELL	(TOC):		
	METHOD OF	REMOVAL:				PUMF	PING RATE:		
			Gallons	Temp.		Sp. Cond.	Turbidity	DO	REDOX
WELL	DTW	Time	Removed	(C₀)	pН	(mS/cm)	(NTU)	(mg/L)	(mv)
PURGE									
DATA									
			· <u></u>						
			· <u></u>						
SAMPLE WIT	HDRAWAL METHO	OD:					SAMPLED	BY:	
SAMPLE NUI	MBER(S) AND TIMI								
NOTES:									
LAB ANALYS	SIS PARAMETERS	AND PRESERVA	ATIVES:						
NI IMBER AN	D TYPES OF SAMI	PLE CONTAINE	RS LISED:						
NOMBLITAN	D I II LO OI OAWI	I LL OONTAINL	IO OOLD.						
DECON. PRO	OCEDURES:								
SAMPLES DE	ELIVERED TO:				TRANSI	PORTER:			
	DATE:				_	TIME:			

SOIL BORING LOG

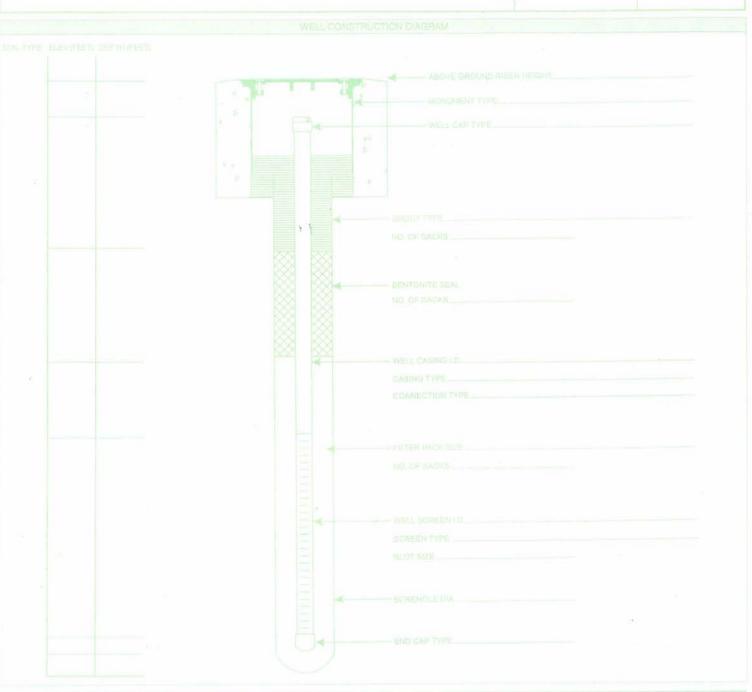


	2.				



AS-BUILT WELL LOG

PROJECT NO. 1	
	DATE COMPLETED
INSTALLABOR THE	



DOMMENTS

Seattle
11720 North Creek Parkway N
Suite 400
Bothell, WA 98011
phone 425.420.9200 fax 425.420.9210

Chain of Custody Record

TestAmerica

TestAmerica Laboratories, Inc.

Client Contact	Project Manager: Leah Vigoren		Site Contact: Leah Vigoren	Date:		COC No:
AMEC Earth & Environmental, Inc.	Tel/Fax: (206) 838-8470		Lab Contact:	Carrier:		of COCs
600 University Street Suite 1020	Analysis Turnaround Time	nd Time				Job No.
Seattle, WA 98101	Calendar (C) or Work Days (W)	(W)				
(206) 342-1760 Phone	TAT if different from Below					
(206) 342-1761 FAX	2 weeks					SDG No.
Project Name: ExxonMobil/ADC	1 week					
Site: Everett	2 days					
P O # 9915-15716C	1 day		aidin			
Sample Identification	Sample Sample Sample Date Time Type	# of Matrix Cont.	g& bə1911171			Sample Specific Notes:
Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other	H; 6= Other					
Possible Hazard Identification Non-Hazard Flammable Skin Irritant	Poison B Unknown		Sample Disposal (A fee may be assessed if samples are retained longer than 1 month) Return To Client Disposal By Lab Monte	assessed if sar Disposal By Lab	imples are retained lor b	d longer than 1 month) For Months
Special Instructions/QC Requirements & Comments: Send electronic data to leah.vigoren@amec.com	nic data to leah.vigoren@amec.c	mo				
Relinquished by:	Company:	Date/Time:	Received by:	Company:	ny:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received by:	Company:	ny:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received by:	Company:	ny:	Date/Time:

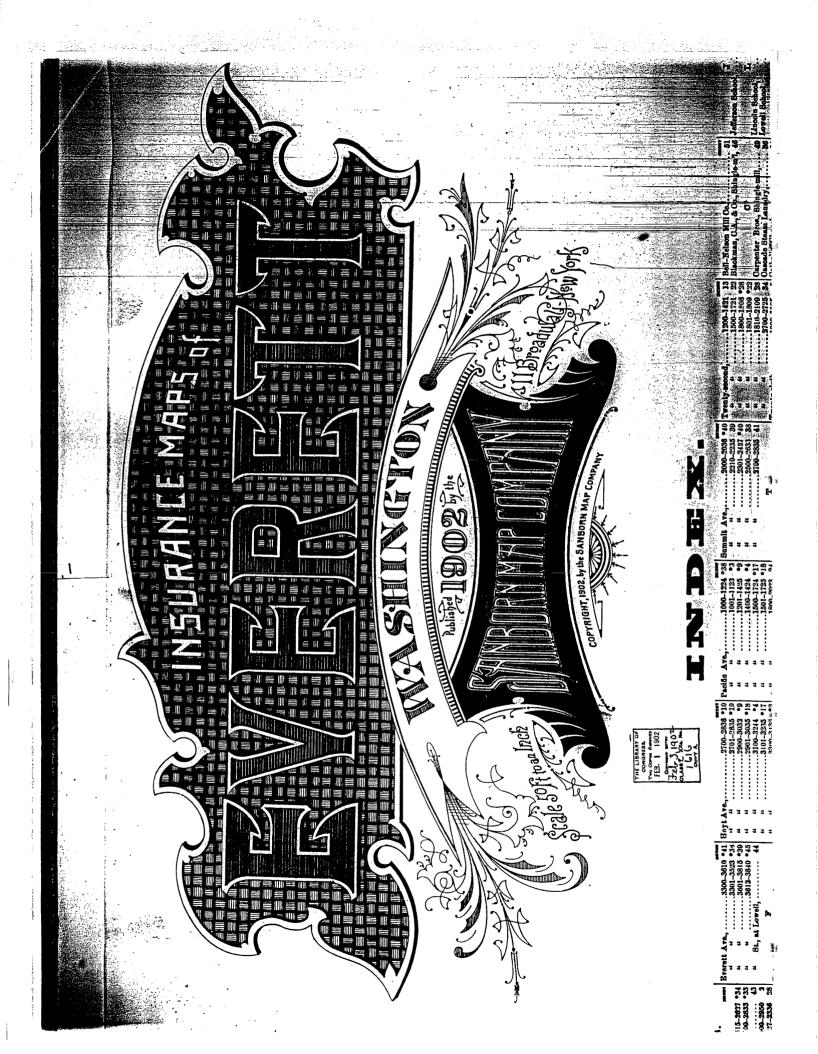


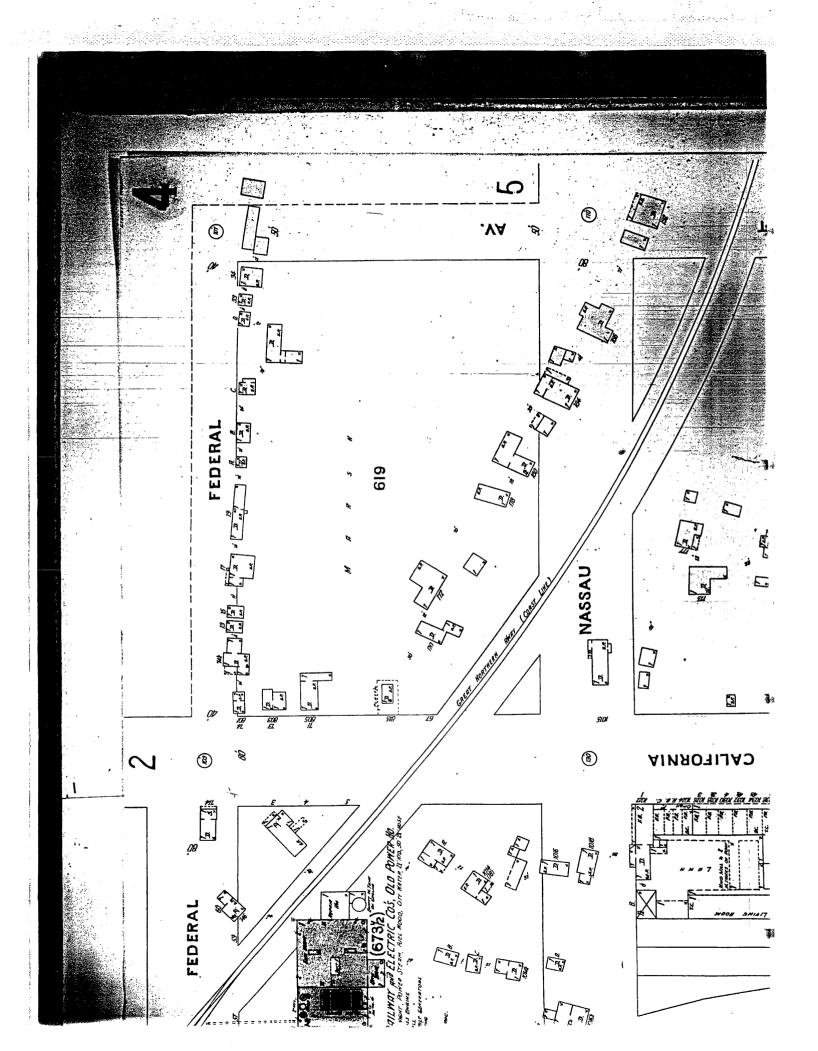
PROJECT WELL NO. WELL DEVELOPMENT LOG JOB NO. DATE PREPARED BY METHOD REMARKS: OVERPUMPAGE _ INITIAL WATER LEVEL FINAL WATER LEVEL **BAILER** VOLUME BETWEEN CASING AND HOLE CAPACITY OF CASING SURGE **BLOCK** (GALLONS/LINEAR FOOT) (GALLONS/LINEAR FOOT) (ASSUMING 40% POROSITY) AIR LIFT 2" = 0.162" CASING AND 6" HOLE - 0.52 4" = 0.652" CASING AND 8" HOLE - 0.98 OTHER 6" = 1.47 4" CASING AND 10" HOLE = 1.37 4" CASING AND 12" HOLE - 2.09 HOLE DIAMETER WELL VOLUME CALCULATION: WELL CASING INSIDE DIAMETER $d_wID = ___$ CASING VOLUME = $V_c = \Pi \left(\frac{d_w ID}{2} \right)^2 (TD - H) = 3.14 \left(\frac{1}{2} \right)^2 \left(\frac{1}{2} \right)^2$ OUTSIDE DIAMETER $d_wOD =$ $$\begin{split} \text{FILTER PACK PORE VOLUME} \ = \ V_{\text{f}} = & \Pi \! \left[\left(\frac{d_{\text{h}}}{2} \right)^{\! 2} - \! \left(\frac{d_{\text{w}} OD}{2} \right)^{\! 2} \right] \! \left[\text{TD} - (\text{S or H *})(\text{P}) = \underline{\hspace{1cm}} \right] \\ & (*\text{if S} > \text{H, use S; if S} < \text{H, use H}) \\ & = 3.14 \! \left[\left(\frac{}{2} \right)^{\! 2} - \! \left(\frac{}{2} \right)^{\! 2} \right] \! \left[\frac{}{2} - \frac{}{2} \right]$$ DEPTH TO: WATER LEVEL BASE OF SEAL BASE OF WELL TD **EST. FILTER PACK** TOTAL WELL VOLUME = $VT = Vc + Vf = \underline{\hspace{1cm}} + \underline{\hspace{1cm}} = \underline{\hspace{1cm}} ft.^3 \times 7.48 = \underline{\hspace{1cm}}$ DEVELOPMENT LOG: CUMULATIVE WATER QUALITY WATER REMOVED COMMENTS FLOW TIME ELAPSED RATE CONDUC-TURBID-GALLONS REDOX DTW BEGIN/END METHOD TIME TEMP TIVITY D.O.* (gpm)

^{* =} Dissolved Oxygen

APPENDIX B

Historical Maps and Documentation

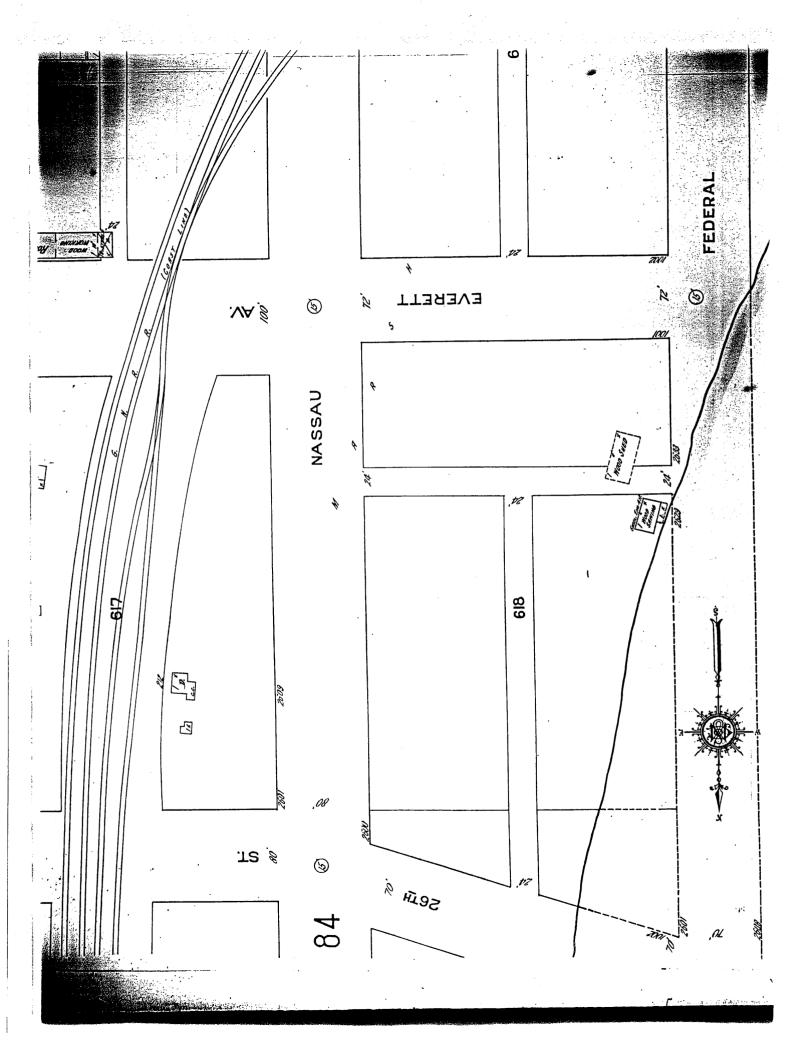








Copyright 1914 by the Sanborn Map Company



FEDERAL ~ *57.* MASSAU

The regular Administrative Session of the City Council was held August 16, 1915, at 10:30 A.M. with Mayor Clay in the Chair and Commissioners Clay, Kelly and Salter present at roll call.

On motion minutes approved as of record. Moved by Kelly, seconded by Salter, that bills of A. C. Chilson for \$6.00 and H. J. Linden for \$11.65 for services as registration clerks beallowed and ordered paid.

Carried unanimously

Moved by Kelly, seconded by Salter that the City Attorney be instructed to prepare an ordinance covering the installation of oil tanks north of the G. N. Dock.

Carried unanimously

Moved by Kelly, seconded by Clay that the City Attorney be instructed to prepare an ordinance regulating the speed of Street Railway cars to conform to the speed allowed autos.

Carried unanimously

On motion Council adjourned at 11:00 A. M.

City Clerk

Lee

City Clerk

Local

Company

Com

An ordinance granting to the Standard Oil Company, a corporation, a permit to locate, erect, operate and maintain a ware-house or tankage, or both, and other necessary buildings, on a certain tract of land in the city of Everett described as follows: Lot 1, block 619, Plat of Everett, at the corner of Everett Avenue and Federal Street, for the storage and distribution of petroleum and its products, and other kinds of merchandise, by said company, and declaring an emergency.

THE CITY OF EVERETT DOES ORDAIN:

Section 1: That the Standard Oil Company, a corporation, be and it is hereby granted permission to locate, erect, operate and maintain a warehouse or tankage, or both, and other necessary buildings, upon that certain tract of Tand in the city of Everett described as follows: Lot 1, block 619, Plat of Everett, at the corner of Everett Avenue and Federal Street, for the storage and distribution of petroleum and its products, and other kinds of merchandise handled by said company, said warehouse, tankage and buildings to be constructed in accordance with the plans and specifications therefor filed by said company with the city clerk of the city of Everett and now on file in the office of said clerk.

Section 2: WHEREAS, it is desirous to begin the construction of said warehouse, tankage and buildings immediately, an emergency is declared to exist, and this ordinance shall take effect upon its passage and publication.

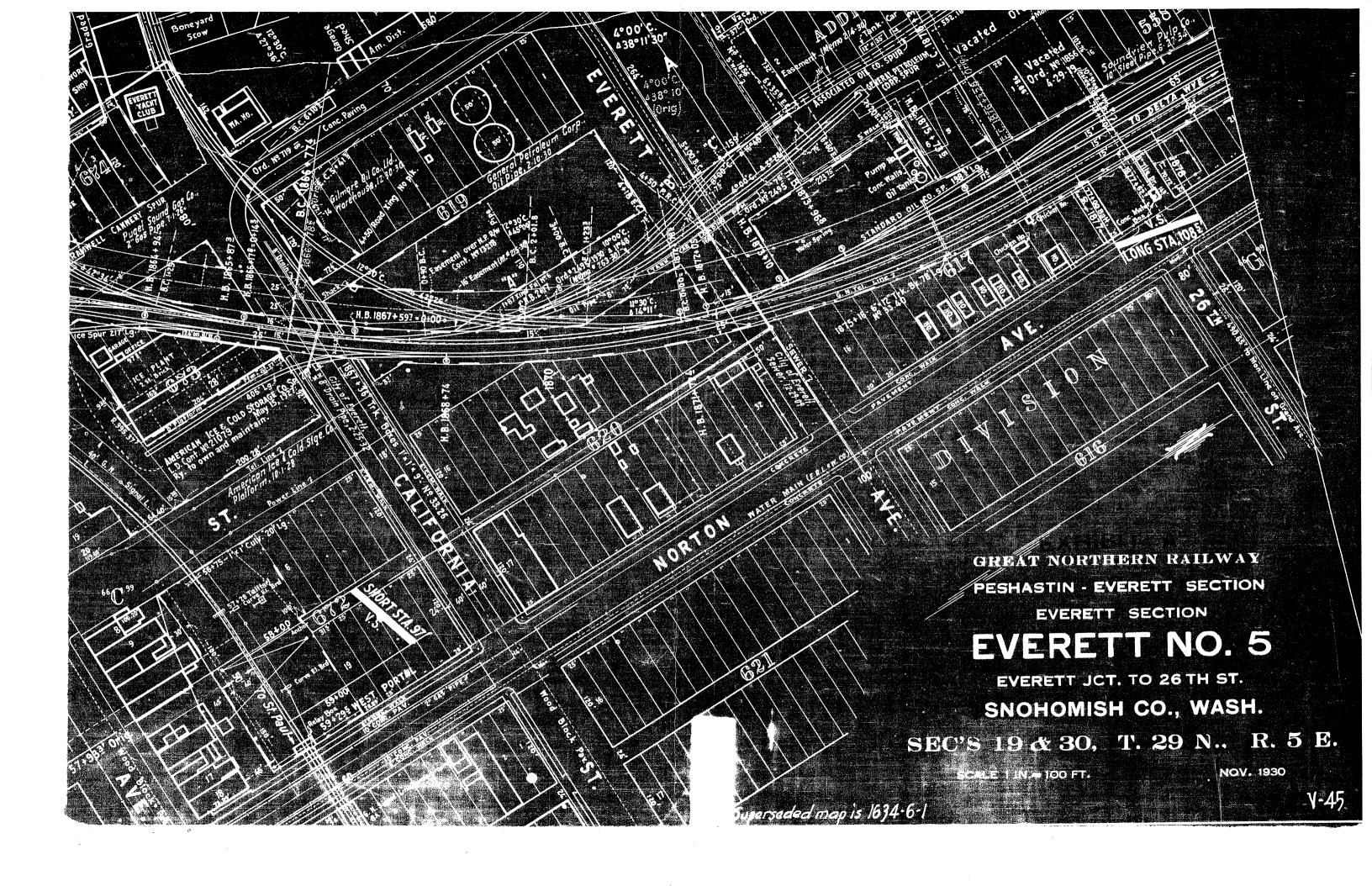
Passed AUG 2 4 19

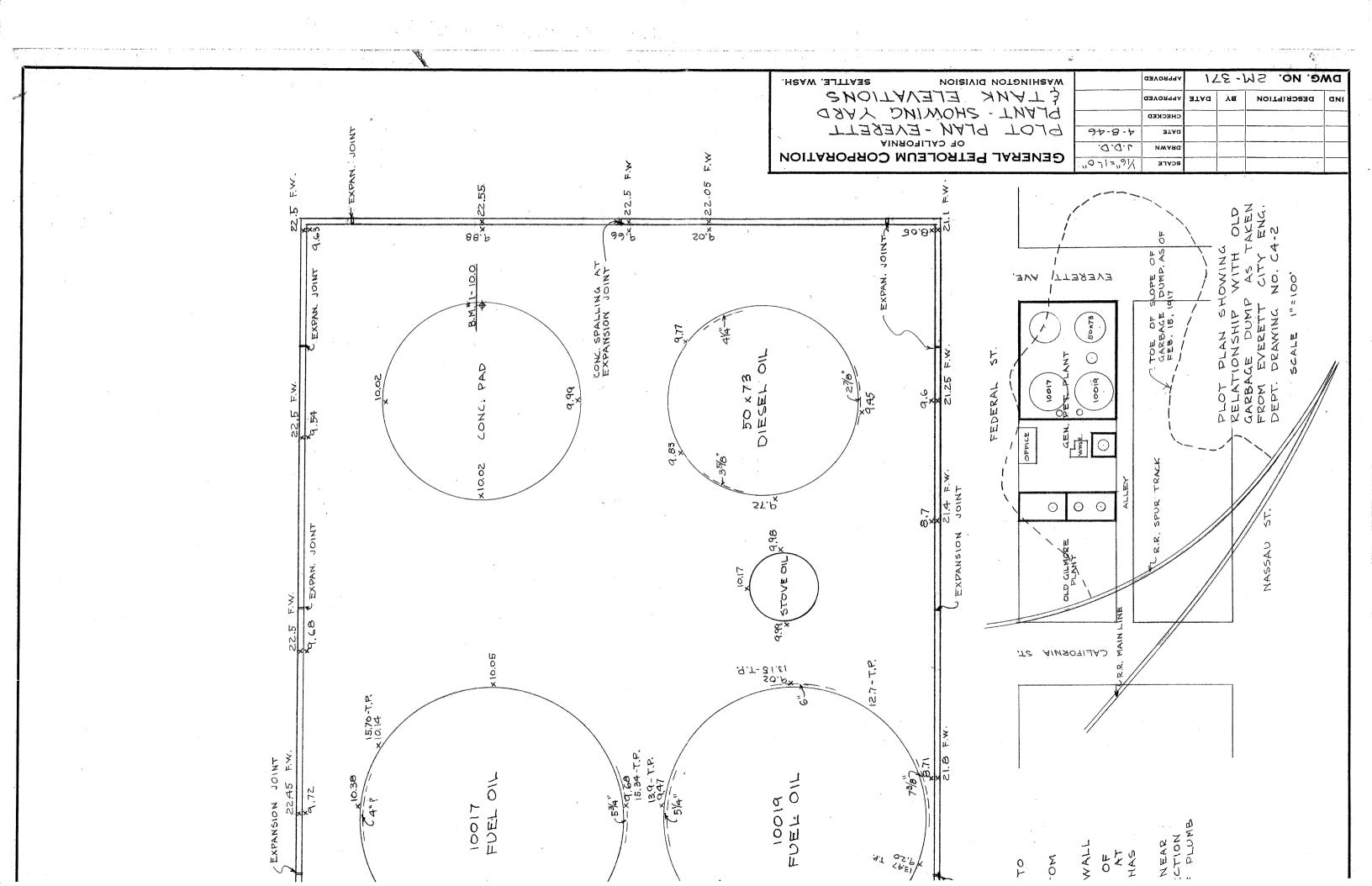
Published

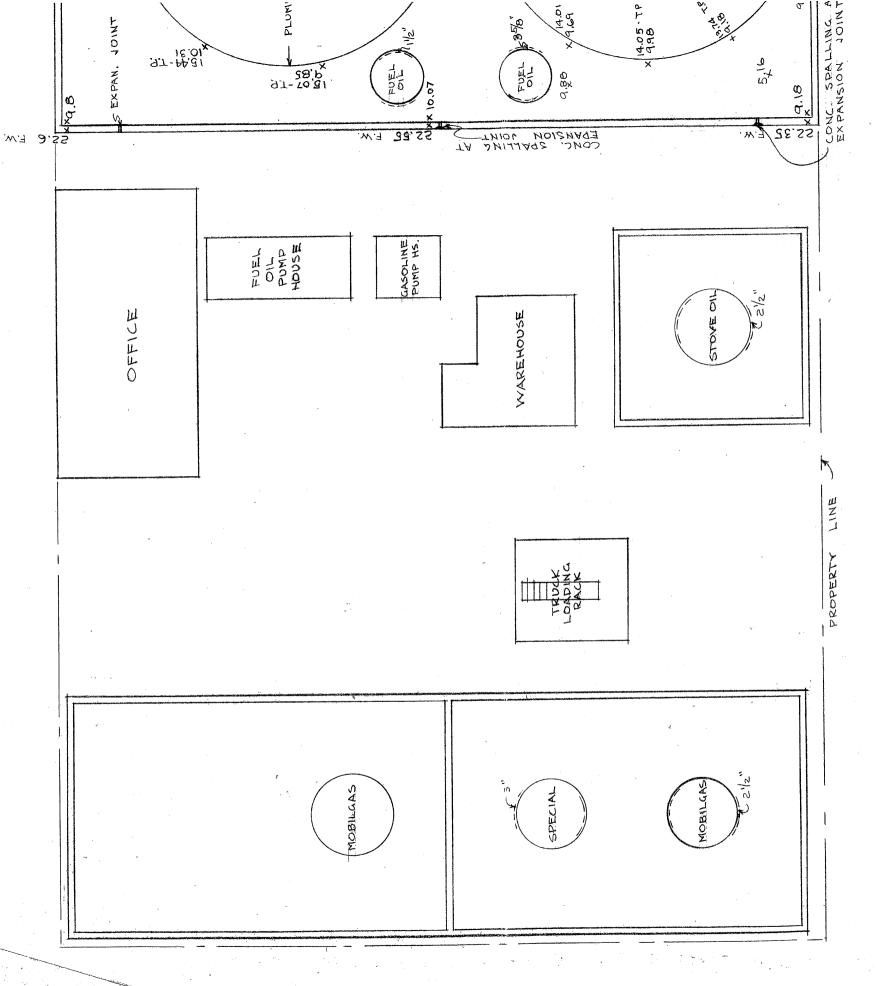
Attest Zeu Zelfk.

EXHIBIT

AUG 2 5 1915







OW WATER WATER

このと

MATER WATER LOW WA

EME HIGH HIGH W LOWER

EXTREME MEAN HIC MEAN LOI EXTREME

108,92 106,66 103,16 92,68 88.68

10.00

B.M.

4.24 - 6.24 - 10.24

DAHOM

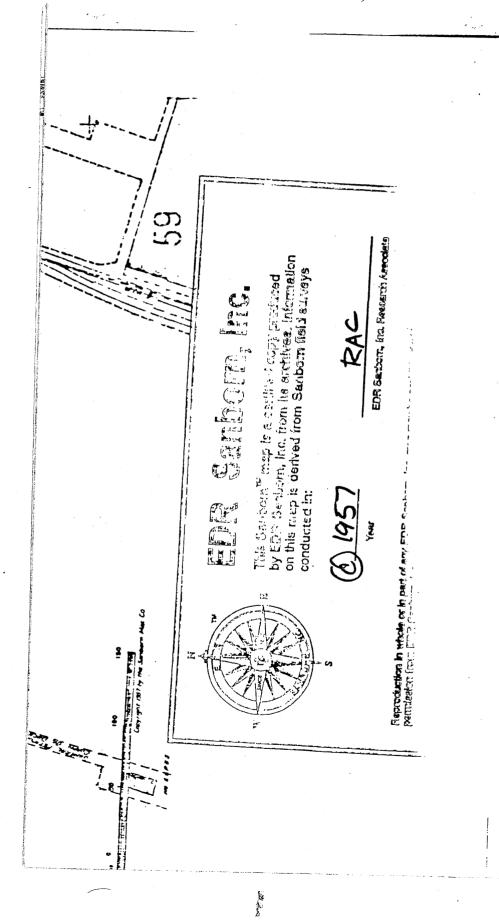
T CITY ELEV.

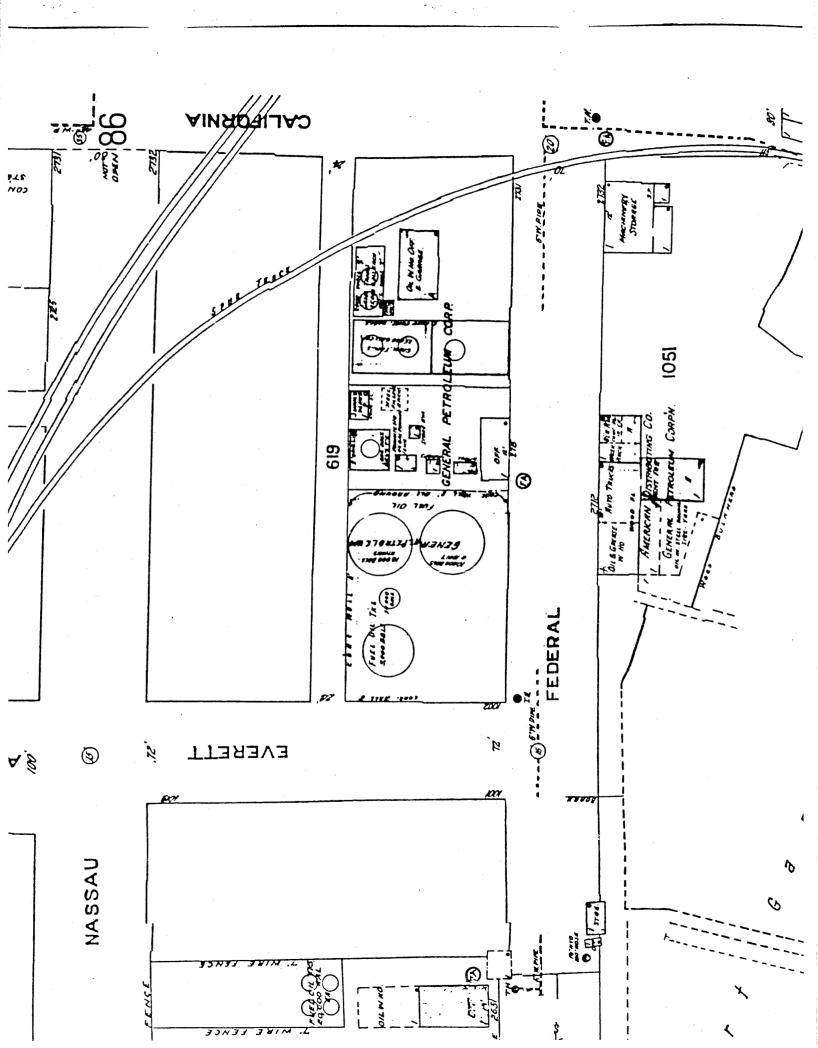
EVERET

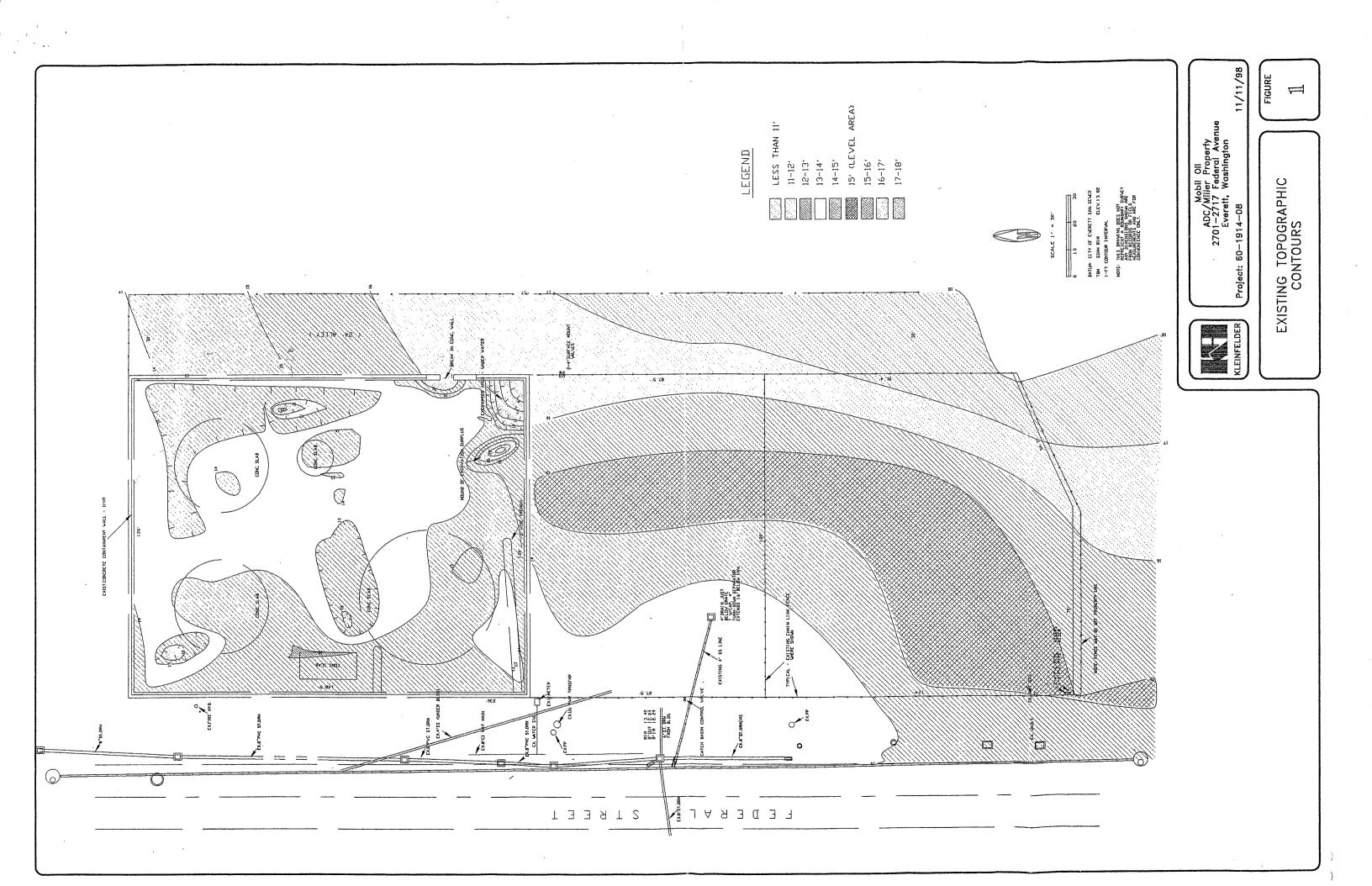
ELEV.

NOTES

ARE Ø EXCE NG PAI INCHE HE D BELOW Z AND DIMENSIONS
OF TANKS INDICATE
IN WHICH THEY INDICATED 7 AROUND OF CO COVERED ELEVATION T AS EVELS 10019 BEEN ELEVATIONS EXCEPT YARD GROUND LE T.P. INDICATES E DOTTED LINES OUTSIDE EDGE AND DISTANCE INDICATES ELEVATIONS TANKS ARE TANK NO. 10 SUNK AND F. W.









December 27, 2006 6-914-15716-0

ExxonMobil–Global Remediation 4580 Klahanie Drive SE PMB 507 Issaquah, Washington 98029

Attention:

Mr. Tim Strawn

Subject:

Forensic Evaluation of Petroleum

Hydrocarbons ExxonMobil and ADC/Miller

Parcel

2717/2731 Federal Avenue

Everett, Washington

Dear Mr. Strawn:

AMEC Earth & Environmental, Inc. (AMEC) has prepared this letter in response to the request from ExxonMobil to review forensic data from NewFields Environmental Practice, LLC (NewFields) for the former Mobil Oil/American Distribution Corporation (ADC) Terminal at 2717/2713 Federal Avenue, Everett, Washington (the Site).

AMEC chemists reviewed the report titled *Chemical Characterization of NAPL Samples Former Mobil Oil Terminal (46-108), Everett, Washington* (NAPL Report), prepared by NewFields dated May 31, 2006, along with data supplied by NewFields from chemical analysis performed by Alpha Analytical Woods Hole Laboratory of Woods Hole, Massachusetts (AWHL). A copy of the New Fields report and AWHL data are attached as Exhibit 1. The NAPL Report presents an evaluation of data generated by AWHL for three light nonaqueous phase liquid (LNAPL) samples, designated MW-29, W-1, and W-2. Sample MW-29 and sample W-1 were collected from monitoring wells at the Site, while sample W-2 was collected from an off-site location. A map of the Site, showing the location of the groundwater monitoring wells is attached to this letter as Exhibit 2.

This review was performed by AMEC on behalf of ExxonMobil in order to evaluate whether findings presented in the NAPL Report were consistent with the analytical data from AWHL, and to identify whether the analytical data was suggestive of the possible presence of off-site sources of the petroleum hydrocarbons in LNAPL samples collected.

Based on examination of the data included with the NAPL Report, AMEC concludes that LNAPL samples collected from on-site wells MW-29 and W-1 are similar to each other, but different from LNAPL collected from off-site well W-2, and that the presence of LNAPL in W-2 is not a result of transport of petroleum hydrocarbons from the on-site wells, MW-29 and W-1, to the off-site well, W-2.



The remainder of this letter will present specific details of AMEC's evaluation of the NAPL Report. The associated data, as related to the visual examination of bulk composition using chromatograms from whole oil analysis LNAPL samples, and a discussion of the specific diagnostic ratios of biomarkers and sulfur-bearing compounds taken from the detailed chemical analyses performed by AWHL for Newfields (as shown in the NAPL Report) will also be presented.

Evaluation of Bulk Composition of LNAPLs from On-site and Off-site Wells

Based on AMEC's inspection of whole oil chromatograms from samples MW-29, W-1 and W-2, as presented in the Newfields Report (see Page 3 of Exhibit 1), the following conclusions about bulk composition of LNAPL from the three samples can be drawn:

- The two on-site LNAPL samples (MW-29 and W-1) appear to be predominantly mixtures
 of degraded diesel mixed with degraded gasoline and small amounts of residual-range
 hydrocarbons. The diesel-range chromatograms for the on-site samples exhibit a nontypical diesel pattern, which is likely the result of gasoline present in LNAPL and
 enhanced solubilization of organic materials from the surrounding soil caused by the
 gasoline, as opposed to straight diesel.
- LNAPL from the off-site sample (W-2) appears to consist predominantly of highly degraded diesel with only a trace amount of gasoline. Based on visual examination of the whole oil chromatograms, the diesel in sample W-2 appears much more degraded than the diesel in the on-site samples, and is likely from a much older release.
- NAPL samples from MW-29, W-1, and W-2 all contain residual-range hydrocarbons. No
 quantitative results for gasoline, diesel, or residual-range petroleum hydrocarbons were
 included in the NAPL report, but based on visual examination of the whole oil
 chromatograms, relative concentrations of residual-range hydrocarbons appear to be
 higher in the on-site samples (MW-29, and W-1) than the off-site sample (W-2), possibly
 due to enhanced solubilization of asphalt or other high molecular weight petroleum
 hydrocarbons from soil or fill due to the presence of gasoline.
- In the professional opinion of AMEC, based on the visual inspection of the two Total Petroleum Hydrocarbon (TPH) chromatograms for MW-29 and W-1, LNAPL collected from MW-29 appears less degraded than LNAPL collected from W-1. LNAPL collected from MW-29 also appears to have a higher abundance of gasoline-range compounds relative to diesel-range compounds than LNAPL collected from MW-1. As stated above, both on-site LNAPL samples appear to be less degraded than LNAPL collected from offsite well W-2.



Examination of Diagnostic Ratios Related to Sulfur Content, and Select Biomarkers

The most direct evidence that LNAPL samples collected from on-site wells MW-29 and W-1 are similar to each other, but different from LNAPL collected from off-site well W-2, involves comparison of relative sulfur concentrations in LNAPLs from the three wells using diagnostic ratios of the concentrations of dibenzothiopenes (sulfur-containing polycyclic aromatic hydrocarbons [PAH] analogs) to phenanthrenes (sulfur-free PAHs). In the NAPL Report, ratios of C₂-substituted dibenzothiopenes to the sum of C₂-substituted dibenzothiopenes and C₂-substituted phenanthrenes were plotted against ratios of C₃-substituted dibenzothiopenes to the sum of C₃-substituted phenanthrenes in order to allow comparison of relative sulfur abundances between the three LNAPL samples. The resulting plots (see Exhibit 1, page 6, Figure 3) demonstrate that LNAPL samples collected from MW-29 and W-1 had sulfur abundances similar to each other, but distinct from, and lower than, the sulfur abundance for LNAPL collected from W-2. Based on this analysis, LNAPLs in MW-29 and W-1 are derived from a petroleum source that has a lower sulfur concentration than the petroleum source from which LNAPL in W-2 is derived.

Alkylcyclohexanes are a family of petroleum constituents that are resistant to degradation, and that have been used as forensic markers in multiple investigations involving diesel fuels, as their concentration in diesel fuels is typically greater than the concentrations of many other biomarker families. Inspection of the m/z 83 ion chromatograms (see pages 33-36 of Exhibit 1), which corresponds to the molecular weight of the base ion for alkylcyclohexane compounds, also reinforces the assertion that LNAPL samples collected from MW-29 and W-1 are similar to each other, but distinct from LNAPL collected at W-2. The chromatographic traces from MW-29 and W-1 exhibited unresolved chromatographic envelopes (UCEs) with similar retention times, but slightly differing peak patterns. The peak pattern for LNAPL collected from MW-29 exhibits higher relative contributions by early-eluting peaks than the peak pattern from LNAPL collected at W-1, and although enhancement of lower molecular weight alkylcyclohexanes can sometimes be related to degradation of higher molecular weight alkylcyclohexanes (a sign of a more highly degraded material), the pattern of peaks in this case does not support that assertion, but is strongly indicative of a less degraded sample. The m/z 83 ion chromatogram for the LNAPL sample collected from W-2, on the other hand, shows nearly universal decreases in peak height for all the alkycyclohexanes compared to the matching peaks for sample MW-29 and W-1, again indicating that the diesel component of LNAPL in W-2 originated from an older release.

Retene is a naturally-occurring PAH often associated with coniferous resins or other higher plant matter. The retene concentration detected in the LNAPL collected from W-1 is more than two-fold higher than the retene concentration in LNAPL collected from MW-29, and more than four-fold higher than the retene concentration in LNAPL collected from W-2 (570 mg/kg in W-1 versus 230 mg/kg in MW-29 and 130 mg/kg in W-2). It is also inconsistent with the retene concentrations in these two samples. Considering the known disposal of wood waste on the Site, the anomalous retene concentration may be a result of solubilization of retene from wood waste by the mixture of



diesel fuel and gasoline, but it could also indicate that the diesel fuel contained in sample W-1 is derived from a source distinctly different from the diesel in LNAPL from MW-29.

Finally, as stated above, the gasoline and diesel in LNAPL collected from MW-29 appears less degraded than the gasoline and diesel in LNAPL collected from W-1. In addition, MW-29 is located at a distance from W-1 and near the upgradient side of the property. It is possible that the gasoline in LNAPL, collected from MW-29, originates from an off-site source.

In conclusion, based on examination of information provided in the NAPL Report, AMEC concludes that:

- 1) LNAPLs from MW-29 and W-1 are derived from sources with lower sulfur concentrations than the source from which LNAPL in W-2 is derived.
- 2) LNAPLs from MW-29 and W-1 consist predominantly of a mixture of weathered diesel and weathered gasoline, while LNAPL from W-2 consists predominantly of diesel fuel with small amounts of gasoline.
- 3) LNAPLs from all three locations contain small amounts of residual range petroleum hydrocarbons, which are likely related to solubilization of asphalt or other high molecular weight petroleum hydrocarbons from soil or fill at the site.
- 4) LNAPL in W-2 is more highly weathered, and therefore, likely older than LNAPLs in MW-29 and W-1.
- 5) LNAPL in W-1 contains two-fold higher levels of retene than LNAPL in MW-29, which may indicate different sources or may be the result of the presence of higher plant matter in the soil in the area in which W-1 is located.
- 6) LNAPL in W-1 contains anomalously high levels of decalins and C1-naphthalenes compared to LNAPL in MW-29, which suggests influence of a distinct source or release.
- 7) Diesel in LNAPL from MW-29 appears to be less highly weathered than the diesel in LNAPL from W-1, and LNAPL from MW-29 also contains more gasoline than LNAPL from W-1.

Chromatographic patterns, relative sulfur abundances, and PAH analyses all point to similarities between LNAPL collected from MW-29 and LNAPL collected from W-1, and differences between these LNAPLs and LNAPL collected from W-2. Samples MW-29 and W-1 appear to consist primarily of degraded mixtures of gasoline and diesel with a small residual-range component, while LNAPL collected from W-2 appears to be degraded diesel with trace amounts of gasoline-range and residual-range compounds. The diesel-range analytes in MW-29 and W-1 are similar enough to indicate a common original source, but are different enough to exclude a common release. The diesel-range analytes detected in W-2 are different from both MW-29 and W-1. AMEC was unable to evaluate the gasoline component of LNAPL samples because of a lack of additional analyses of gasoline-range organics.



ExxonMobil-Global Remediation December 27, 2006

6-914-15716-0 Page 5

Based on these conclusions and the location of MW-29, distant from W-1 and near the upgradient property boundary, the origin of at least some portion of LNAPL in MW-29 from a source distinct from W-1 cannot be ruled out. If viable third-party sources can be identified in the vicinity of W-1 or W-29, AMEC recommends that Exxon-Mobil/ADC may wish to consider the acquisition of new LNAPL samples from wells at the Site, and analysis of a forensic suite that includes analyses that will yield more information related to the gasoline-range component of LNAPL.

If you have any questions or require further information, please do not hesitate to contact us.

Sincerely,

AMEC Earth & Environmental, Inc.

Sean Gormley, EAC, CHMM Chemist

sea.gormlev@amec.com

Senior Associate/Environmental Chemist

Meg Strong

meg.strong@amec.com

L.G. Senior Technical Manager

CC:

William Joyce, Salter Joyce Ziker PLLC Diana Martin, Bingham McCutchen, LLP

ENVIRONMENTAL CHEMISTS

Andrew John Friedman James E. Bruys, Ph.D. (208) 285-8282.

3012 16th Avenue West Seattle, WA 98119-2029 FAX: (206) 283-5044

November 27, 1995

Tim Peter, Project Leader AGRA Earth & Environmental, Inc. 11335 NE 12204 Way, Suite 100 Kirkland, WA 95034-6918

Dear Mr. Poter:

Enclosed are the results from the testing of material submitted on November 22, 1995 from your 11-04558-07 project.

Samples MW-30 and MW-29 contained a heavy fuel oil such as Bunker C, or alternatively, a weathered crude oil. The two samples were very similar, and could easily be from the same source. Sample B-1 contained a heavily westbered Diesel fuel or heating oil. B-1 did not contain the high boiling fraction seen MW-29 and MW-30.

Sample Marihole appeared to contain the water soluble fraction of a middle or heavy petroleum distillate. The GC/FID trace showed patterns of C3-benzenes, naphthalene, methylnaphthalenes, and dimethylnaphthalenes. These components tend to be the more water soluble fraction of middle and heavy distillates. A small amount of whole product may also be present, but the water soluble compounds dominate the GC/FID trace.

MW-29 , MW-30 and B-1 may have all been sources to Machole. It is also possible that Manhole has an entirely different source, origin unknown.

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

Sincerely,

FRIEDMAN'S BRUYA, INC.

Beth Albertson Chemist

keh Enclosures FAX: 821-3814 AEE127RD00

ENVIRONMENTAL CHEMISTS

Date of Report: November 27, 1995 Date Received: November 22, 1995

Project: 11-04558-07

Date Samples Extracted: November 24, 1995

RESULTS FROM THE ANALYSIS OF PRODUCT SAMPLES
FOR FINGERPRINT CHARACTERIZATION
BY CAPILLARY GAS CHROMATOGRAPHY
USING A FLAME IONIZATION DETECTOR (FID)
AND ELECTRON CAPTURE DETECTOR (ECD)

Sample III

B-1

GC Characterization

The GC trace using the flame ionization detector (FID) showed the presence of medium balling compounds. The patterns displayed by these peaks are indicative of diesel fuel or heating oil.

The medium boiling compounds appeared as a pattern of peaks eluting from n-C6 to n-C24 showing a maximum near n-C17. The material appears to have undergone chemical/biological degradation due to the presence of a broad unresolved hump of peaks and to the loss of the n-alkane peaks.

The large peak seen near 25 minutes on the GC/FID trace is pentagosane, added as a quality assurance check for this GC analysis. There is a second internal standard peak seen on the GC/ECD trace at about 26 minutes which is dibutyl chlorendate.

The GC trace using the flame ionization detector (FID) showed the presence of low, medium and high boiling compounds. The patterns displayed by these peaks are indicative of a heavy fuel oil such as Bunker C or a crude oil.

The low, medium and high boiling compounds appeared as a ragged pattern of peaks eluting from n-C6 to n-C84 showing a maximum near n-C17. A lack of a dominant pattern of n-alkanes was seen. n-Alkanes are preferentially consumed by microorganisms, and a lack of n-alkanes may be correlated to biological weathering.

The large peak seen near 25 minutes on the GC/FID trace is pentacosane, added as a quality assurance check for this GC analysis. There is a second internal standard peak seen on the GC/ECD trace at about 26 minutes which is dibutyl chlorendate.

MW-30

ENVIRONMENTAL CHEMISTS

Date of Report: November 27, 1995 Date Received: November 22, 1995

Project: 11-04558-07

Date Samples Extracted: November 24, 1995

RESULTS FROM THE ANALYSIS OF PRODUCT SAMPLES
FOR FINGERPRINT CHARACTERIZATION
BY CAPILLARY GAS CHROMATOGRAPHY
USING A FLAME IONIZATION DETECTOR (FID)
AND ELECTRON CAPTURE DETECTOR (ECD)

Sample ID

MW-29

GC Characterization

The GC trace using the flame ionization detector (FID) showed the presence of low, medican and high boiling compounds. The patterns displayed by these peaks are indicative of a heavy fuel oil such as Bunker C or a crude oil.

The low, medium and high boiling compounds appeared as a ragged pattern of peaks eluting from n-C6 to n-C34 showing a maximum near n-C17. A lack of a dominant pattern of n-alkanes was seen. n-Alkanes are preferentially consumed by microorganisms, and a lack of n-alkanes may be correlated to biological weathering. The material present is very similar, though not identical, to the product in MW-30.

The large peak seen near 25 minutes on the GC/FID trace is pentagosane, added as a quality assurance check for this GC analysis. There is a second internal standard peak seen on the GC/ECD trace at about 26 minutes which is dibutyl chlorendate.

ENVIRONMENTAL CHEMISTS

Date of Report: November 27, 1995 Date Received: November 22, 1995

Project: 11-04558-07

Date Samples Extracted: November 24, 1995

RESULTS FROM THE ANALYSIS OF WATER SAMPLES
FOR FINGERPRINT CHARACTERIZATION
BY CAPILLARY GAS CHROMATOGRAPHY
USING A FLAME IONIZATION DETECTOR (FID)
AND ELECTRON CAPTURE DETECTOR (ECD)

Sample II)

GC Characterization

Manhole

The GC trace using the flame ionization detector (FID) showed the presence of medium builing compounds. The patterns displayed by these peaks are indicative of the water soluble fraction of a petroleum product.

The medium boiling compounds appeared as a ragged pattern of peaks cluting from n-Ce to n-C22 on the GC/FID trace. An irregular pattern of n-alkanes is seen from n-C11 to n-C19. n-Alkanes have poor solubility in water. It is possible that small amounts of whole product are mixed into the water phase. The major peaks seen between eight and fourteen minutes are likely to be alkylated benzenes, naphthalene, and alkylated naphthalenes. These compounds typically dominate the water soluble fraction of diesels and heavy heating oils. The material present was seen in low concentration, making product identification tentative. The detection limit for this analysis is 200, 400 and 800 ppb (µg/L) for gasoline, diesel and motor oil, respectively.

The large peak seen near 25 minutes on the GC/FID trace is pentacosane, added as a quality assurance check for this GC analysis. There is a second internal standard peak seen on the GC/ECD trace at about 26 minutes which is dibutyl chlorendate.

NRW-1

The GC trace using the flame ionization detector (FID) and the GC electron capture detector (ECD) trace showed an absence of volatile and semi-volatile compounds. The detection limit for this analysis is 500, 1,000, and 2,000 ppb (µg/L) for gasoline, diesel and motor oil respectively.



18939 120th Avenue N.E., Suite 101 • Bothell, WA 98011-9508 East 11115 Montgomery, Suite B • Spokane, WA 99206-4776 9405 S.W. Nimbus Avenue + Beavenon, OR 9/008-7132

(509) 924-9200 • FAX 924-9290

(503) 643-9200 • FAX 644-2202

(208) 481-9200 - FAX 485-2992

11335 NE 122nd Way, #100 Attention: Tim Peter First Sample #: B511431-02 Reported: Nov 27, 1995

Sample Matrix:

AGRA Earth & Environmental Client Project ID: Mobil Everett Analyzed: Nov 26-27, 1995

TOTAL PETROLEUM HYDROCARBONS-GASOLINE RANGE

Sample Number	Sample Description	Sample Result µg/L (ppb)	Surrogate Recovery %	
B511431-02	te-ww	N.D.	80	
B511431-03	ES-WM	N.D.	80	
B511431-04	MW-96	N.D.	. 80	
B511431-05	MW-32	N.D.	84	
8511431-06	MW-6	N.D.	85	
B811431-07	MW-18	N.D.	86	
B611431-08	B-2	N.D.	. 88	
8511431-09	MW-18	4,800	S-2	
B511431-10	MW-17	N.D.	92	
B511431-11	MW-18	4,000 G-1	8-2	
	The state of the s	·		

Reporting	Limit:
-----------	--------

50

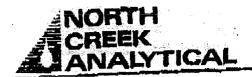
4-Bromofluorobanzene surrogate recovery control limits are 50 - 150 %. Volatife Total Petroleum Hydrocarbone are quantitated as Gasoline Rarige Organics (toluene - dedecane). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CREEK ANALYTICAL Inc. Picese Note:

5-2 - The Stirrogate Recovery for this sample cannot be accurately quantified due to interference from coeluting organic compounds present in the sample.

Good Manager

511431,AGR 43>



19939 120th Avenue N.E., Suite 101 • Bothes, WA 98011-9508 East 11115 Montgumery, Suite B . Spokane, WA 99298-4776 3406 S.W. Nimbres Avenue • Beaverton, OR 97008-7132

(206) 401-9200 - FAX 485-2992 (500) 924-9200 • FAX 924-9290

(000) 843 9200 • FAX 544-2202

11335 NE 122nd Way, #100

Nov 22, 1905

Sample Matrix:

Analyzed: Nov 26-27, 1995

Attention: Tim Peter First Sample #: B511431-12 Reported: Nov 27, 1995 TOTAL PETROLEUM HYDROCARBONS-GASOLINE RANGE

	,		
Sample Number	Sample Description	Sample Result µg/L (p¢b)	Surrogate Recovery %
B511431-12	MW-8	110	105
B611431-13	WM-a	N.D.	88
B511431-14	MW-27	160 G-1	92
B511431-15	MW-28	N.D.	86
8511431-16	MW-10 11/22/98	1,300	, \$-2
B611431-17	MW-11 11/22/95	790	S-2
B511431-18	MW-12 11/22/95	N.D.	83
B511431-19	MW-15 11/22/85	120	95
B511431-20	MW-85 ⊕ 11/22/95	· N.D.	77
8611431-21	MW-37	N.D.	70

50 Reporting Limit:

4-Bromofluorobanzene surrogate recovery control limits and 50 - 150 %.

Volatile Total Petroleum Hydrocarbons are quantitated as Gasoline Range Organics (toluene - dedecane). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CHEEK ANALYTICAL Inc. Please Note:

S-2 = The Surrogate Recovery for this sample cannot be accurately quantified due to interference from coaluting organic compounds present in the sample.

Shannon Stowell Project Manager

511431.AGH <4>



18939 120th Avenue N.E., Suite 101 • Bothell, WA 98011-9508 East 11115 Montgomery, Suite B • Spokene, WA 99206-4778

9405 S.W. Nimbus Avenue * Beaverton, OR 97008-7132

(206) 481-9200 • FAX 485-2992 (509) 924-9200 + FAX 924-9290 (503) 643-6200 • FAX 644-2202

AGRA Earth & Environmental Client Project ID: Mobil Everett 11335 NE 122nd Way, #100 Attention: Tim Peter First Sample #: BLK112695 Reported: Nov 27, 1995

Sample Matrix:

Method Blank WTPH-G

Analyzed: Nov 26-27, 1995

TOTAL PETROLEUM HYDROCARBONS-GASOLINE RANGE

Sample Number	Sample Description	Sample Result µg/L (ppb)	Surrogate Recovery %
BLK112695	Method Blank	N.D.	78

Reporting Umit:

50

4-Bromofluorobenzene surrogate recovery control limits and 50 - 150 %. Volatile Total Petroleum Hydrocustions are quantitated as Gasoline Range Organica (toluene - dodecane). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CREEK ANALYTICAL Inc.

Shannon Stowell Project Manager

48× ADVIENTE



18909 120th Avenue N.C., Suite 101 + Bothall, WA 98011-9506 (206) 481-9200 = FAX 485-2992 Sast 11115 Mortgomery, Suite B + Spokene, WA 99208-4778 (509) 924-9200 + FAX 924-9290 (503) 645-9200 • FAX 644-2302 9405 S.W. Ninibus Avenue + Beaverton, OR 97008-7132

PRECISION ASSESSMENT

1335 NE 122nd Way, #100 Irkland, WA 98034

GRA Earth & Environmental Client Project ID: Mobil Everett Sample Matrix: Water Analysis Method: WTPH-G Unite: µg/L (ppb)

Analyzed: Nov 26-27, 1995 Reported: Nov 27, 1996

HYDROCARBON QUALITY CONTROL DATA REPORT

ACCURACY ASSESSMENT Laboratory Control Sample			Gas	Sample Duplicat	
	Gasoline		1	Organics	
Spike Conc. Added:	100	•	Sample Number: 6	511431-10	B611431-18
Spiko Result:	95		Original Result:	N.D.	N.D.
% Recovery:	95	,	Duplic ate Result:	N.D.	N.D.
Upper Control Limit %:	132		of Difference:	elative Percent Differe sported at sample conv see than 10 times the f	contration levels
Lower Control	56 ·	•	Maximum RPD:	50	క 0

NORTH CREEK ANALYTICAL Inc.

Shamon Stowell Project Manager

Spike Result Spike Concentration Added × 100

Relative % Difference:

x 100

Original Result - Duplicate Result (Original Result + Duplicate Result) / 2

(206) 481-9200 • FAX 485-2992 (509) 924-9200 • FAX 924-9290 (503) 643-9200 + FAX 644-2202

11335 NE 122nd Way, #100 Attention: Tim Peter First Sample #: B511431-02 Reported: Nov 27, 1995

Sample Matrix:

AGRA Earth & Environmental Client Project ID: Mobil Everett Analyzed: Nov 26-27, 1995

BTEX DISTINCTION

		DIEVA	יטוו טוון פול				
Sample Number	Sample Description	Benzene µg/L (ppb)	Taluene µg/L (ppb)	Ethyl Benzene µg/L (ppb)	Xylenes µg/L (ppb)	Surrogate Recovery %	
B511431-02	te-wa	N.D.	N.D.	N.D.	N.D.	76	
B511431-03	MW-33	N.D.	N.D.	N.D.	N.D.	74	
B511431-04	àe-wm	N.D.	N.D.	Ņ.Ď.	N.D.	73	
B511431-05	MW-32	N.D.	N.D.	N.D.	N.D.	76	,
B511431-06	ww- 8	· N.D.	N.D.	N.D.	N.D.	78	
B511431-07	MW-15	N.D.	N.D.	N.D.	Ŋ,D.	80	
B511431-08	8 -⊉	0.78	N.D.	N.D.	N.D.	ยง	
B511431-09	Ww-18	640	9.8	26	140	127	
B511431-10	MW-17	66	0.53	N.O.	N.D.	78	
D811431-11	MW-18	170	N.D. (F.L. = 2.0)	5.8	3.7	105	
Reporting Limit	8:	0. 5 0	0.50	0.50	1.0		

4-Bromofluorobenzene surrogate recovery control limits are \$9 - 144 %. Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CREEK ANALYTICAL Inc.

Shapport Stowell Project Manager



(206) 481-9200 + FAX 485-2892 19930 120th Avenue N.E. Suite 101 • Botnell, WA 98011-9308 East 11115 Montgomery, Suite B • Spokeno, WA 99206-4776 gane S.W. Nimbus Avenue + Degreton, OR 97008-7132

(609) 024-9200 - FAX 924-9290 (500) 543-8200 - FAX 544-2202

AGRA Earth & Environmental Client Project ID: Mobil Everett 11335 NE 122nd Way, #100 Kirkland, WA 98034 Attention: Tim Peter First Sample #:

Sample Matrix:

EPA 8020

Nov 22, 1995

Analyzed: Nov 26-27, 1995 Nov 27, 1995 Reported:

Analysis Method:

BTEX DISTINCTION

		BIEY	Net filikara.				
Sample Number	Sample Description	Benzen e µg/L (ppb)	Toluene ug/L (ppb)	Ethyl Benzeñe µg/L (µpb)	Xylenes µg/L (ppb)	Surrogate Recovery %	
B511431-12	MW-B	7.7	N.D.	N.D.	N.D.	88	
B611431-13	MW-8	1,3	N.D.	N.D.	N.D.	79	
	MW-27	N.D.	N.D.	N.D.	N.D.	83	
B511431-14	MW-28	N.D.	N.D.	N.D.	N.D.	79	
B511431-15	MW-10	1.3	N.D.	N.D.	2.0	S-2	·
B511431-16	1 1/22/95 MW-11	36	0.80	1.8	1,8	109	•
B511431-17	11/22/98 MW-12	9.2	N.D.	N.D.	1.0	77	·
B511431•18	11/22/95 MW-13	5.2	N.D.	N.D.	N.D.	88	• .
B511431-19	11/22/98 MW-35	2.7	N.D.	N.D.	1.7	74	
B811431-20	11/22/95 MW-87	0,50	N.D.	N.D.	N.D.	69	
B511431-21	WAAAOI				1.0		Bankier
Reporting Limit	s:	0. 5°	0.50	0.50			

4-Bromofluorobenzene surrogate recovery control limits and 50 - 142 %. Analytes reported as N.D. were not detected above the stat. a Limit.

NORTH CREEK ANALYTICAL Inc. Please Note:

Shannon Slowell Project Manager

5-2 - The Surrogate Recovery for this for

and he accurately quentified due to interference

from cos ing orga

went in the sample.



18939 120th Avenue N.E., Suttle 101 • Bothell, WA 98011-9505 (206) 481-9200 • FAX 485-2992 East 11115 Montgomery, Suite B + Spokeno, WA 99209-4776 (503) 543-9200 + FAX 644-9202 8405 8.W. Nimbus Avenue + Beaverton, OR 97008-7132

11335 NE 122nd Way, #100 ALEMBOR: THE FELT OC Sample #: B511431-02

Reported: Nov 27, 1998

Reported: Nov 27, 1998

Reported: Nov 27, 1998

Project Mans.

apprend begrande de la company de la company

Sample Matrix: Water

Analysis Method: EPA 8020

Nov 26, 1995 Analyzed:

MATRIX SPIKE QUALITY CONTROL DATA REPORT

								\neg
NALYTE	Berizene	Tolyene	Ethyl Benzana	Xylenes				
Sample Result:	N.D.	N.O.	N.D.	N.D.		٠,		
Spike Conc. Added:	10.0	10.0	10.0	30.0		•		
Spike Result:	9.7	9. 5	9.9	31 4				
Spike % Recovery:	97%	95%	99%	105%				
Spike Dup. Assult:	9.4	9.83	9.6	30.5				
Spike Duplicate % Recovery:	94%	98%	96%	102%	•	•		
Upper Control Limit %:	115	116	122	122	•			•
Lower Control Limit %:	82	81	8 5	.85				
Relativo % Difference:	3.1%	1.4%	3.1%	2.9%				
Maximum нPD:	16	18	16	17		x 100		
NODEL C	FIGA	5		iks Result - Samp Spike Conc. A	dded	, parents	•	
NORTH C	,	isiativo % Difference	: <u>Spiles</u>	ke Rosult - Solke I Result + Space D		x 100		
Shafinon Sa			1-6			511	431.AGR <10	(>



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Surrogate

(206) 481-9200 + FAX 485-X962 (509) 924-9200 • FAX 924-9290 (503) 643-9200 + FAX 644-2202

11335 NE 122nd Way, #100 Kirkland, WA 98034

Sample Matrix: Analysis Method:

First Sample #:

WTPH-D Extended B511431-02

negation production and the second se Nov 22-26, 1995 Analyzed: Nov 26-27, 1995 Nov 27, 1995 Reported:

TOTAL PETROLEUM HYDROCARBONS - DIESEL RANGE EXTENDED

Heavy Qil

Sample Number	Sample Description	Diesel Resült mg/L (ppm)	Result mg/_ (ppm)	Recovery %	•		
B511431-02	MW-31	0.47	N.D.	79			
B511431-03	WM-83	0.79	N.D.	81			
B511431-04	MW-36	0.71	N.Ď.	76			
B511431-05	WM-35	0,40	N.D.	78	,		
B511431-06	MW-8	0,80	1.4	72			
B611431-07	MW-18	0.77	1.2	74		•	
B511431-08	B-2	4.4	3.9	ВО			
B511431-09	MW-15	1.7 D-1	1.7	83		•	
B511431-10	MW-17	0,49	0.97	81	,		
B611431-11	MW-18	18	4.4	111	Andreas and the second of the		
Reporting Lim	it:	0.25	0.75				
				-		•	

2-Pluombiphenyl surrogate recovery control limits are 50 - 150%. Extractable Hydrocarbuna are quantitated as Dieset Range Organics (C12 - C24) and Heavy Oil Range Organics (>C24). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH-OREEK ANALYTICAL Inc.

Shannon Stowell Project Manager 511431.AGR <11>

Surrogate

(205) 481-9200 • FAX 485-2992 (509) 824-9200 = FAX 924-9290 (509) 843-9200 • FAX 844-2207

11335 NE 122nd Way, #100 Kirkland, WA 98034 Attention: Tim Peter

Sample Matrix: Analysis Method:

First Sample #: "

Water

WTPH-D Extended

B511431-12

AGRA Earli & Environmental Client Project ID: Mobil Everett Nov 22, 1995

Extracted: Nov 22-26, 1996 Analyzed: Nov 26-27, 1996

Nov 27, 1995 Reported:

. opendo. Nov 27, 1903 . opendopens promining de la compansión de TOTAL PETROLEUM HYDROCARBONS - DIESEL RANGE EXTENDED

Heavy Oil

Sample Number	Sample Description	Diesel Result mg/L (ppm)	Heavy Oil Result mg/l (ppm)	Recovery			
B511431-12	8-WM	3.3	3.1	91	•		
B511431-13	MW-9	. 3.3	3,3	90	,		
B511431-14	MW-27	4.7	4.4	98			
B611431-15	MW-28	3.4	3,7	94		·	•
₿511431-16	MW-10 11/22/95	4.2	6.8	84			
B511431-17	MW-11 11/22/95	2.4	1.2	93			•
B511431-18	MW-12 11/22/95	2.1	3.6	84	·		
B511431-19	MW-13 11/22/95	8.7	3.1	98			
B511431-20	MW-38 11/22/96	0.33	(1.1	93	·		
B511431-21	MW-37	1.6	2.4	84			
Reporting Limi	t:	0.25	0.75				

2-Pluoroblphenyl surrogate recovery control limits are 50 - 150%. Extreosable Hydrocarbone are quantitated as Diesel Range Organics (C12 - C24) and Heavy Oil Range Organics (>C24). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NOBTH-CREEK ANALYTICAL Inc.

Hatinor Slowell Project Manager



10939 120th Avenue N.E., Suite 101 • Bothell, WA 980 11-9508 East 11115 Montgomery, Suite B • Spokane, WA 99206-4778 9405 S.W. Nimbus Avanue & Beaverton, OR 97008-7132

(206) 481-9200 + FAX 485-2992 (509) 924-9200 • FAX 924-9290 (503) 643-9200 • FAX 644-2202

335 NE 122nd Way, #100 rkland, WA 98034

Sample Matrix: Analysis Method: First Sample #:

WTPH-D Extended BLK112295

A Earth & Environmental Client Project ID: Mobil Everett Analyzed: Nov 26-27, 1995 Nov 27, 1995 Reported:

Tabolisa in a second de la company de la TOTAL PETROLEUM HYDROCARBONS - DIESEL HANGE EXTENDED

Sample Numbor	Sample Description	Diesel Result mg/L (ppm)	Henvy Oil Heault mg/L (ppm)	Surrogate Recovery %
BLK112295	Method Blank	N.D.	N.D.	84
BLK112695	Method Blank	N.D.	Ń.D.	85

Reporting Limit:

0.25

0.75

Extractable Hydrocarbons are quantitated as Diseal Range Organics (C12 - C24) and Heavy Oli Range Organics (>C24). Analysis's reported as N.D. were not detected above the stated Reporting Limit.

NORTH-CREEK ANALYTICAL Inc.

Project Manager

511431,AGR <13>



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11335 NE 122nd Way, #100

Project Manager

Kirkland, WA 98034 neponec: Nov Z/, 1990 կ
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and propagation of the second second

Analysis Method: WTPH-D

Units: mg/L (ppm)

Analyzed: Nov 26-27, 1995

Reported:

Nov 2/, 1995

HYDROCARBON QUALITY CONTROL DATA REPORT

	HYU	HOCKUPON GENERAL	PRECISION A	SSESSMENT
ACCURACY ASSESSMENT Laboratory Control Sample			Sample Du Diesel Hange Organics	Diesel Hange Organics
	Diesel			
Spike Conc. Added:	2.04		Sample Number: B511431-09	B511398-02
Spike Result:	1.91		Original Result: 1.7	1.9
% Recovery:	94	•	Duplicate Result: 1,4	2.2
Upper Control	107		1.1=1==	ent Difference values are not mple concentration levels mes the Reporting Limit
Lower Control	69		Maximum RPD: 44	44

X 100 Spiko Flecult NORTH CREEK ANALYTICAL Inc. % Recovery. Spike Concentration Added x 100 Original Result - Duplicate Result (Original Result + Duplicate Result) / 2 Relative % Difference: 511431.AGR <145 -Shannon Stowell



(206) 481-9200 • FAX 485-2997 18939 120th Avenue N.E., Suite 101 + Botherl, WA 98011-9508 (509) 924-9200 - FAX 924-9290 East 11115 Montgomery, Suite B - Spokane, WA 99206-4776 (503) 643-9200 • FAX 644-2202 9405 S.W. Himbus Avenue • Beaverton, OR 97008-7132

VGRA Earth & Environmental Client Project ID: Mobil Everett 1335 NE 122nd Way, #100 Kirkland, WA 98034

Sample Mainx: Water

Analysis Method: WTPH-D

Units: mg/L (ppm)

Nov 26, 1995 Extracted: Analyzed: Nov 28-27, 1995

Reported: Nov 27, 1995

HYDROCARBON QUALITY CONTROL DATA REPORT

PRECISION ASSESSMENT ACCURACY ASSESSMENT Sample Duplicate Laboratory Control Sample Diesel Hange Organics Diesel **Sample** Number: B511431-19 Spike Conc. 2.04 Added: Original Spike 6.7 Result: 1.61 Result: Duplicate 5.7 Result: 79 Recovery: Relative **Upper Control** 16 % Difference: 107 Limit %: Maximum Lower Control 44 RPD: 69 Limit %:

NORTH CREEK ANALYTICAL Inc.

Shannon Stowell Project Manager % Recovery:

Solke Remait Spike Concentration Added x 100

Relative % Difference:

Original Result - Duplicate Resul (Original Result + Duplicate Result) / 2 x 100

511431.AGR x15>

18939-120th Avenue N.E., Suite 101 + Bother, WA 98011-9505 (206) 481-9200 • FAX 485-2992 East 11115 Montgomery, Suite B + Spokane, WA 99206-4776 (509) 924-9200 + FAX 924-9290 94US S.W. Nimbus Avenus • Requerton, OR 97008-7132 (503) 843-9200 • FAX 644-2202

HYDROCARBON ANALYSIS FOOTNOTES

2/94, Rev. 3

VOLATILE HYDROCARBONS - GA	SOLINE RANGE ORGANICS
----------------------------	-----------------------

- This sample appears to contain extractable diesel range organics. G 1
- The chromatogram for this sample does not resemble a typical gasoline pattern. Please refer to the sample G 2 chromatogram.
- The total hydrocarbon result usualls sample is primarily due to an individual compound(s) eluting in the volatile hydrocarbon range. Identification and quantitation by EPA 8010, 8021 or 8240 is recommended. G 3
- This sample commins compound(s) not identified as Benzene, Toluene, Ethyl benzene of Xylene. () *
- This sample appears to contain or be saturated with gasoline product. G 5

EXTRACTABLE HYDROCARBONS - DIESEL RANGE ORGANICS

- This sample appears to contain volatile gasoline range organics. D 1
- The hydrocarbons present in this sample resemble heavy, non-resolvable oil range organics. Quantitation by D 2 TPH-Diesel Extended or TPH 418.1 is recommended.
- The hydrocarbon concentration result in this sample is partially due to an individual peak(s) eluting in the D 3 diesel / motor oil carbon range.
- The hydrocarbons present in this sample are a complex mixture of diesel range and heavy oil range organics. D4 -
- The hydrocarbon result shown is an estimated (greater than) value due to the high concentration. Reanalysis is being performed to yield a quantitative result. An amended report will follow. D 5
- The sample chromatographic pattern does not resemble the fuel standard used for quantitation. A fuel fingerprint

D 6	The sample chromatographic pattern does not received a la advised.		
p 7	This sample appears to contain or be saturated with diesel product.	Oils and Lubricants]
•	(TRPH 418.1	
	Diesel & Fuel Oils		,
	Extractable Hydrocarbons (TPH-D)		
	Gasoline	·	

Volatile Hydrocarbons (TPH-G)

MOI

HYDROCARBON BOILING POINT RANGE LOW TO MEDIUM

MEDIUM TO HIGH MEDIUM

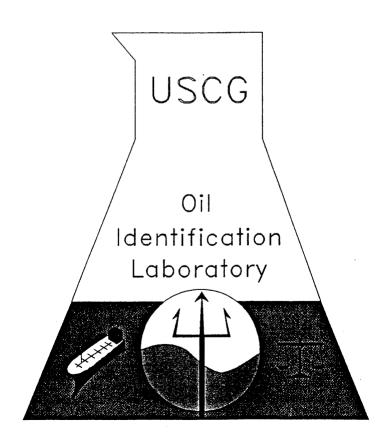
VERY HIGH

6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31+ CARBON RANGE:

OIL SAMPLE ANALYSIS REPORT

MARINE SAFETY OFFICE PUGET SOUND CASE NUMBER MC95015622

MARINE SAFETY LABORATORY CASE NUMBER 96-013





Commanding Officer
U. S. Coast Guard
Marine Safety
Laboratories

1082 Shennecossett Road Groton, CT 06340-6094 Phone: (860) 441-2645 Fax: (860) 441-2641

16400

OCT 1 8 1995

From: Commanding Officer, Marine Safety Laboratories

To: Commanding Officer, Marine Safety Office Puget Sound

Subj: OIL SAMPLE ANALYSIS REPORT, MSO PUGET SOUND CASE# MC95015622

MSL CASE #96-013

1. The laboratory analysis of this case has been completed and our report is forwarded. The technical data supporting the report (spectrograms and chromatograms) have been archived at our facility and are available upon request. We will maintain the oil samples in refrigerated storage pending final case disposition.

2. Questions concerning this report or the analytical methods used should be directed to the Supervisor of Analysis, Dr. Hendrick.

M. S. HENDRICK
By direction

Marshad Hendrick

Encl: (1) MSL Report 96-013

(2) OIS Addendum

UNITED STATES COAST GUARD OIL IDENTIFICATION LABORATORY

OIL SPILL IDENTIFICATION REPORT

LABORATORY CASE NUMBER: 96-013

REQUESTOR: MSO PUGET SOUND UNIT CASE NUMBER: MC95015622

RECEIVED: 160CT95 VIA: U.S. MAIL

NUMBER OF SAMPLES: TEN (10)

LAB NO. OF SPILLS: 1,2,5,6 AND 7 LAB NO. OF SUSPECTS: 3,4,8,9 AND 10

ANALYSIS METHODS:

GAS CHROMATOGRAPHY (GC)
GAS CHROMATOGRAPHY/MASS SPECTROMETRY (GC/MS)

RESULTS:

- 1. Samples 1,2,5,6 and 7 were specified to have been representative of spilled oil. Analysis indicates:
- a. Samples 1,2,5 and 6 are similar and contain a severely biodegraded and evaporatively weathered heavy fuel oil mixed with lubricating oil.
- b. Sample 7 contains only traces of a severely biodegraded heavy fuel oil mixed with lubricating oil. The characteristics of sample 7 are similar to those expected for a severely weathered version of samples 1,2,5 and 6.
- 2. Suspected source sample 8 is observed to contain a heavy fuel oil with characteristics similar to those of the heavy fuel oil component of the spilled oil. Most differences are consistent with biodegradative and evaporative weathering of the spilled oil; However, this sample contains no lubricating oil.
- 3. Suspected source samples 3 and 4 are observed to contain biodegraded light fuel oil with characteristics different from those of the spilled oil.
- 4. Suspected source samples 9 and 10 are observed to contain mixtures of fuel oil and lubricating oil with characteristics different from those of the spilled oil.

CONCLUSIONS:

- 1. Spill samples 1,2,5,6 and 7 represent different portions of the same spilled oil.
- 2. The heavy fuel oil in suspected source sample 8 and the spill samples 1,2,5,6 and 7 may be derived from a common source. Biodegradation, as noted in the spilled oil samples, is characteristic of oil that has been retained in a contaminated

CONTINUATION OF OIL SPILL IDENTIFICATION REPORT 96-013

environment for an extended period of time. Not all differences noted are consistent with biodegradative weathering of the spilled oil. It should be noted that lubricating oil contamination is very common in sewers. For this reason, the area in proximity to the location from which sample 8 was collected should be investigated further as the most likely source of the spilled oil.

3. None of suspected source samples 3,4,9 or 10 are derived from a common source of the spill samples 1,2,5 and 6.

Marthad Hendrick

UNITED STATES COAST GUARD OIL IDENTIFICATION LABORATORY

SAMPLE CHECK-IN LOG, COIL CASE NUMBER: 96-013

REQUESTOR: MSO PUGET SOUND UNIT CASE# MC95015622

!		METHOD OF DELIVERY		DATE RECEIVED
U	JS MAIL	MESSENGER	OTHER	
NUMBER	DATE MAILED	O/A		1
N/A	11 OCT 95			16 OCT 95

Samples were observed to be: broken NO, tampered with NO, leaking NO, or subject to contamination NO. For these and other unusual conditions, place an asterisk (*) next to the sample(s) in question and describe condition of sample(s) in remarks below.

LAB NO.	SAMPLE DESCRIPTION	SPILL	SUSPECT
LAB NO.	[1] OIL FROM PIPE OF SEWER OUTFALL AT BREAK		!
96-013-1	·	xxxxx	Ì
96-013-1	[2] SAMPLE OF FUEL IN THE WATER		1
96-013-2	02 OCT 95 0850	xxxxx	1
90-013-2	[3] POSSIBLE SOURCE FROM HOLE IN GROUND AT		1
96-013-3	AMERICAN DISTRIBUTING 02 OCT 95 1010		XXXXX
	! [4] POSSIBLE SOURCE AMERICAN DISTRIBUTING		!
96-013-4	HOLE IN GROUND 02 OCT 95 1012		XXXXX
70 010 1	HOLE IN GROUND 02 OCT 95 1012 [5] DRAIN LINE IN YARD DOCK. BY FENCE LINE		-
96-013-5	!IN LOG YARD 05 OCT 95 1155	XXXXX	1
<u> </u>	[6] SEWER OUTFALL IN YARD DOCK BY FENCE LINE		1
96-013-6	IN LOG YARD 05 OCT 95 1200	XXXXX	1
	[7] SEWER OUTFALL UNDER LOG ROLE IN LOG YARD		!
96-013-7	02 OCT 95 1615	XXXXX	1
	[8] POSSIBLE SOURCE OF BLACK OIL IN PIPE IN		-
96-013-8	IN GARAGE OLD ENGINE ROOM 05 OCT 95 1210		<u> </u>
	[9] BILGE SIDE OF TANK AT DUNLAP TOWING		
96-013-9	05 OCT 95 1233	L	; XXXXX
	[10] BILGE TANK OF POSSIBLE SOURCE OF TANK		ł
96-013-10	DUNLAP TOWING 05 OCT 95 1233		XXXXX
!			
		<u></u>	<u> </u>
			1
		<u>. </u>	
		! !	! !
		! !	!
	j 1	! !	•
REMARKS:			

Samples checked-in by:	Date:	16 OCT 95
		16 00795
Supervisor of Analysis: Manthas Hendwick	Date:	17 Oct 95

From: COMMANDING OFFICER, MARINE SAFETY OFFICE PUGET SOUND
To: Commanding Officer, Marine Safety Laboratories
Subj: REQUEST FOR OIL SAMPLE ANALYSIS
1. Request analysis of the samples listed on attached Chain of Custody Record to assist in our investigation of spill case FPN 13-1001 MC95015622 (Federal Project Number and Marine Casualty "MC" number)
2. Questions concerning this case should be directed to BM2 CHRIS P. Schrberry COMMERICAL# 266-217-6232.
3. The spill samples were collected from SENER BUTFALL FACILITY. SENER DEAIN AND BAY (river, outfall, shore, etc)
(river, outlair, shore, etc)
4. Estimated number of gallons spilled 50; Estimated cost of cleanup \$3,000.
5. Wind conditions:mild breeze;Very Windy; X Calm.
6. Air Temperature:below 32F; X 32 to 60F;60 to 85F85 to 95F;over 95F.
7. Sky conditions: X_Overcast; Bright Sun; Rain; Other (specify)
8. Spill involves seepage of oil through the soil: Yes X No. If Yes, estimated distance to the nearest possible suspected source:
9. List any possible non-petroleum contamination sources in the area pope
10. Are all samples involved in this case being sent to the laboratory? YES If not, explain
11. Have all possible suspect sources been sampled If NO, include a detailed explanation of possible sources not sampled. Provide any additional information about the samples or overall situation which may be helpful to lab personnel:
12. Specify prosecution type: X Class 1; Class 2; DOJ.
(SIGNATURE)

C-2

UNITED STATES COAST GUARD CHAIN OF CUSTODY RECORD

				AMANDING OFFICER
TIKU)	AND ADI	DRESS)	ບ.ຣ.	COAST GUARD
				INE SAFETY OFFICE ET SOUND
			1519	ALASKAN WAY SOUTH
				TTLE, WA. 98134-1192
SPILL	SOURCE	SAMPLE	NO.	DESCRIPTION OF SAMPLES FOR CASE# MC95015622
XXX		1		OIL FROM PIPE OF SEWER OUTFALL AT BREAKWALL
XXX	·	٦		Sample of fuel in the mater
	×××	3		POSSIBLE SOURCE FROM HOLE IN GREALD OF AMERICANDI
	xxY	<u> </u>		POSSIBLE Source FROM amoercian Distributings Hole Ingl
XXX	! !	5		DRAIN LING IN YARD DOCK by POPUE LINE. TOS FOR
×××	i I I	4		SEVER OUT PALL IN YARD DOCK by FONCELING, Lag YAN
×××	 	17		Somer outfact under log role in log takes
	l 1 1	8		Possible Source of Black on in Garage of all engineers
×××	! !	9		BILGE-SIDE OF TONK DUNLER TOMING CILSIDE
	×××	! `		BILSE TANK OF Ounterpring Bilse Site
	×××	10		1 2/2/2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
ı	!	i 1		1 1
! -	! !	1		
 	; ;	:		
1	1			TIME/DATE

PERSON A	SSUMING RESPONSIBII	ITY FO	R SAMPLES .	! ! !	TIME/DATE
SAMPLE NUMBER	RELINQUISHED BY:	DATE/ TIME	RECEIVED BY:	DATE/	REASON FOR CHANGE OF CUSTODY
1-10	BMZ 4RSCARbonax	1495 1503	MGT - HonX	02 Ostas	STORALE
SAMPLE NUMBER	RELINQUISHED BY:	DATE/	RECEIVED BY:	DATE/	OF CUSTODY
1-10	My Many	110295	BM2CP. Scarboury	1430	Ship to Coil
SAMPLE NUMBER	RELINQUISHED BY:	DATE/	RECEIVED BY:	DATE/ TIME 00 30	REASON FOR CHANGE OF CUSTODY
1-1D	BM & Schebarry	1437	MGT3 ATMGL	1600775	BEASON FOR CHANGE
SAMPLE NUMBER	RELINQUISHED BY:	DATE/ TIME	RECEIVED BY:	DATE/	REASON FOR CHANGE OF CUSTODY
• • • •	 	1	1 1 1	1	1

PAGE / OF /

MARINE SAFETY LABORATORIES OIL IDENTIFICATION LABORATORY

SAMPLE PREPARATION SHEET

21 20	me ppenapen. // O	77.85						
DIL CASE NUMBER: 96-013 DA	IE PREPARED:	les The						
l samples were obtained using preparation techniques listed below. The mples were then placed into a vial and identified with the COIL case mber and sample number along with the corresponding preparation code(s).								
il samples eliminated by IR screening metho	d:							
he Quality Control sample is a duplicate of	sample: <u>- 76-0/3</u>	5-8						
SAMPLE NUMBERS (sequential portion only)	PREPARATION CODE	RATIO						
12348910.00	2							
1,2,3,4,8,9,10,0C 5.6,7	4.7							
PREPARATION CO	DDES							
1. Portion of neat sample taken from sample jar (c								
nortion of sample taken from sample jar, anhydr	ous MgSO ₄ added, then c	entrifuged.						
3 Portion of sample taken from sample jar, dilute	ed with cyclohexane, anh	ydrous MgSO ₄						
added, then centrifuged. 4. Entire sample extracted with cyclohexane, anhy								
5. Entire sample extracted with two separate 10 m	l portions of cyclohexar then centrifuged.	ie, annydrous						
6. Cyclohexane Solution: ratio of oil to cyclohex column.	ane is known and shown	in "ratio"						
7. Cyclohexane Solution of unknown concentration.								
8. Solvent evaporated with heat and a stream of h	12. Sample of unknown c	oncentration						
9. Others:								
Propager's Signature: Buy Alt	Date: <u>//</u>	10 =0.0						

Revised 4/95

MARINE SAFETY LABORATORIES OIL IDENTIFICATION LABORATORY

QUALITY CONTROL SHEET

COIL CASE NUMBER: 96-013 DATE PREPARED: 160CT 95
1. A Quality Control (QC) sample was analyzed along with the other samples in this case. The Quality Control (QC) is a duplicate of sample 96-0/3-8 Due to limited sample quantity in all samples involved in the case, reference oil from the COIL Library was used for the Quality Control (QC) and it's duplicate sample. Infrared Spectroscopy used for screening samples before final sample preparation. No QC sample available during IR screening.
2. ANALYTICAL METHODS. SAT N/A INFRARED SPECTROSCOPY GAS CHROMATOGRAPHY FLUORESCENCE SPECTROSCOPY GAS CHROMATOGRAPHY/MASS SPECTROMETRY
3. The data and conclusions for the QC and it's duplicate were identical: YesX No COMMENTS:

SUPERVISOR OF ANALYSIS: Many had Dendrice DATE: 180CT95

UNITED STATES COAST GUARD MARINE SAFETY LABORATORY

OIL SPILL IDENTIFICATION ANALYSES COST RECOVERY DOCUMENTATION

LABORATORY CASE NUMBER: 96-013

REQUESTOR: MARINE SAFETY OFFICE PUGET SOUND

UNIT CASE NUMBER: MC95015622

NUMBER OF SAMPLES: 10

NUMBER OF ANALYSES: 18

COST PER ANALYSIS: \$97.00

TOTAL COSTS: \$1746.00

This documentation is provided for purposes of Phase IV - Documentation and Cost Recovery under the National Oil and Hazardous Substances Pollution Contingency Plan(40 CFR Part 300).

MARTHA S. HENDRICK DATE: 180CT95
Chemist

OIL SPILL IDENTIFICATION SYSTEM (OIS)

RELEVANCE TO SPILL SOURCE DETERMINATION

Petroleum is a complex mixture of thousands of different organic compounds formed from a variety of organic materials that are chemically converted under differing geological conditions over long periods of time. The infinitely variable nature of these factors results in distinct chemical differences between oils formed under dissimilar conditions and/or environments. While oil from one crude oil field is readily distinguishable from another, differences in the makeup of oils from the same crude oil field can sometimes be observed as well. Refined oils are fractions usually derived by distillation of crude oil. Two refined oils of the same type differ because of dissimilarities in the characteristics of their crude oil feed stocks as well as variations in refinery processes and any subsequent contact with other oils mixed in during transfer operation from residues in tanks, ships, pipes, hoses etc... Thus, all petroleum oils, to some extent have chemical compositions that differ from each other.

The characteristic properties of an oil can be explored by a variety of analytical methods. The results of analysis by any of these methods can be presented in graph form. In general, when the graphical data for two oils produced by a particular method are compared, the differences between the graphs reflect differences between the oils.

The OIS System, developed during the mid-1970s at the Coast Guard Research and Development Center, is based on a multi-method approach to "fingerprinting" oils. In 1978, the Central Oil Identification Laboratory (COIL) was established as the operating facility to implement the OIS. In 1988, COIL was renamed the Marine Safety Laboratories (MSL), though the acronym COIL is still widely used. OIS is designed to determine the unique, intrinsic chemical properties of oils via analytical techniques and establish whether or not a common source relationship exists between samples of spilled oil and samples of oil from a suspected source. Since 1978, MSL/COIL has analyzed over 39,000 samples, involving more than 5,700 spill cases, in support of oil pollution investigations.

DATA PRODUCTION AND INTERPRETATION

Oil sample preparation, testing and storage are conducted in accordance with American Society for Testing and Materials (ASTM) consensus standards. MSL/COIL currently utilizes three primary analytical techniques: Gas Chromatography (GC) (ASTM D-3328), Fluorescence Spectroscopy (FL) (ASTM D 3650), Infrared Spectroscopy (IR) (ASTM D-3414), and Gas Chromatography-Mass Spectrometry (GC-MS) (ASTM D-5739) that is used as a complementary analytical method. A rigorous laboratory quality assurance program monitors both instrument performance and sample preparation to ensure that data are accurate and reproducible.

All samples in a given case are initially analyzed by one method to determine the class of petroleum product. Samples can be excluded from further analysis based on results from the initial analysis. Further analyses are performed on samples which are potential matches to the source of the oil.

The Supervisor of Analysis interprets the data from all test methods performed and draws conclusions concerning whether or not certain spilled oil and suspected source samples were derived from the same chemical source. Data interpretation in oil spill source identification is non-trivial and fundamentally different from typical chemical analyses because the chemical properties of spilled oil are altered when oil is introduced into the environment. From the moment oil enters the environment, evaporation, dissolution, photochemical oxidation, biodegradation and other forces begin to alter the oil's characteristics or "fingerprint". These combined processes are termed weathering and can significantly complicate data interpretation. Contamination of the spilled oil with other oils or substances is another complicating factor. The experienced oil spill analyst is familiar with the complexities of the weathering processes and is able to distinguish real differences between two oils from those apparent differences resulting from weathering alterations. Interferences from contaminants can usually be recognized as such and discounted when weighing the test results. However, at times, severe weathering and/or contamination can mask many of the inherent differences between oils of a similar type.

REPORTING

The typical MSL/COIL OIS Report consists of four parts: case identifying information, a listing of analysis techniques performed, the results section and the conclusions section. The results section describes the types of petroleum observed in the samples provided, and comments on chemical similarities or dissimilarities between spill samples and/or between spill and suspected source samples. In all cases the Supervisor of Analysis bases the written results on interpretations from the aggregate of all data generated.

The conclusions section establishes whether or not a common source relationship exists between samples of spilled oil and samples of oil from a suspected source. There are two outcomes most frequently found in the conclusions section of the typical MSL/COIL OIS Report: "derived from a common source" and "not derived from a common source". However, to maintain the high degree of reliability for both "common source" and "not a common source" determinations, it is necessary to exclude some comparisons from these categories. Oil spill cases vary widely in possible explanations for why a determination could not be Instead of using only a statement of "inconclusive", the comments will concisely explain the reason for the outcome for each individual case. For example, some sources are highly inhomogeneous, and a sample of such a spill may not reflect the composition of the product remaining in such a source. The spill may contain very little oil, or it may be excessively weathered or contaminated. Of important note, MSL/COIL conclusions address chemical comparisons and not physical aspects of evidence. Additionally, chemical evidence provided in a MSL/COIL conclusion that is other than "common source" might still be used by the investigating officer, when combined with physical evidence to establish a preponderance of the evidence argument against an alleged responsible party.

MSL/COIL OIS Reports are submitted to Marine Safety Offices (MSO's) for inclusion, as chemical evidence, in Marine Violation/Casualty Reports. The outcomes in the conclusions section of the OIS Report define the nature of the chemical evidence provided. MSO personnel are advised to combine the chemical evidence provided in the MSL/COIL OIS Reports with physical and circumstantial evidence developed during the investigation when writing Marine Violation Reports. Inquiries challenging the technical content of MSL/COIL OIS Reports by representatives of the alleged responsible party should be handled at the Hearing Officer level. Explicit guidance describing the communications process between the Hearing Officer and the MSL/COIL Supervisor of Analysis on technical issues involving chemical evidence is given in Commandant (G-LMI) memorandum 16460 dated 26 January 1981.

PERSONNEL QUALIFICATIONS

MSL/COIL laboratory technicians performing sample preparation and testing are graduates of the Coast Guard Marine Science Technician School. Each MSL/COIL technician has successfully completed a comprehensive training program at the MSL/COIL facility. Additionally, many have received supplemental training at leading civilian institutions in their specialty area.

The Supervisor of Analysis monitors all aspects of the analysis, certifies and interprets the test results, and prepares the final MSL/COIL report. This individual is a professionally trained chemist experienced in oil spill source identification. Individuals currently qualified to perform this function are:

Lieutenant Commander Kristy L. Plourde, U.S. Coast Guard Commanding Officer

B.S. Physical Sciences, 1983, US Coast Guard Academy M.S. Chemistry, 1989, University of Connecticut

Dr. Martha Hendrick

Chemist

B.A. Chemistry, 1969, Rhodes College

M.A. Education, 1974, Stanford University

Ph.D. Analytical Chemistry, 1985, University of Connecticut Chair, ASTM Subcommittee D19.31, Waterborne Oils

REFERENCES

A more technical description of the OIS is contained in Report CG-D-52-77 "Oil Spill Identification System", Final Report, June 1977, USCG R&D Center. This document is available through the National Technical Information Service, Springfield, VA 22161.

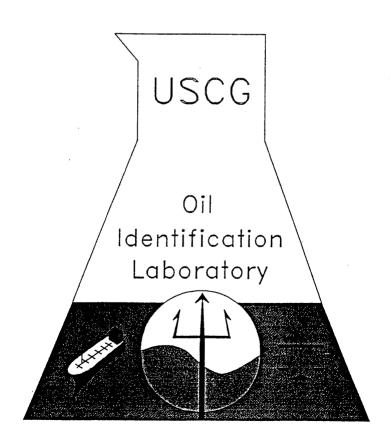
For information concerning the ASTM standards used in Oil Spill Identification, consult "Oil in the Environment", Martha S. Hendrick, Ph.D., ASTM Standardization News, April 1991.

For additional information regarding the applicability of the Coast Guard's OIS, see "Chemical Identification of Oil Spill Sources", Allen P. Bentz, Ph.D., The Forum, Volume XIII, Number 2, Winter 1978. Dr. Bentz is a research scientist at the Coast Guard Research and Development Center and a recognized expert in the field of oil spill source identification. He has been closely involved with most of the development work leading to the present state-of-the-art.

OIL SAMPLE ANALYSIS REPORT

MARINE SAFETY OFFICE PUGET SOUND CASE NUMBER MC95015622

MARINE SAFETY LABORATORY CASE NUMBER 96-097



Commanding Officer
U. S. Coast Guard
Marine Safety
Laboratories

1082 Shennecossett Road Groton, CT 06340-6094 Phone: (860) 441-2645 Fax: (860) 441-2641

16400

DEC 20 1995

From: Commanding Officer, Marine Safety Laboratories

To: Commanding Officer, Marine Safety Office Puget Sound

Subj: OIL SAMPLE ANALYSIS REPORT, MSO PUGET SOUND CASE# MC95015622

MSL CASE #96-097

1. The laboratory analysis of this case has been completed and our report is forwarded. The technical data supporting the report (spectrograms and chromatograms) have been archived at our facility and are available upon request. We will maintain the oil samples in refrigerated storage pending final case disposition.

2. Questions concerning this report or the analytical methods used should be directed to the Supervisor of Analysis, Dr. Hendrick.

Manthas Hendurk

M. S. HENDRICK By direction

Encl: (1) MSL Report 96-097

(2) OIS Addendum

UNITED STATES COAST GUARD MARINE SAFETY LABORATORIES OIL IDENTIFICATION LABORATORY

OIL SPILL IDENTIFICATION REPORT

LABORATORY CASE NUMBER: 96-097

REQUESTOR: MSO PUGET SOUND UNIT CASE NUMBER: MC95015622

RECEIVED: 14DEC95 VIA: CERTIFIED MAIL (# P 902 422 199)

NUMBER OF SAMPLES: FIVE (05)
LAB NO. OF SPILLS: 3 AND 4
LAB NO. OF SUSPECTS: 1.2 AND 5

ANALYSIS METHODS:

GAS CHROMATOGRAPHY (GC)
GAS CHROMATOGRAPHY/MASS SPECTROMETRY (GC/MS)

SPECIAL INSTRUCTIONS:

1. Compare the samples submitted with spill samples from COIL Case 96-013.

RESULTS:

- 1. Samples 96-097-3 and 4 were specified to have been representative of spilled oil. Analysis indicates they do not contain a detectable quantity of petroleum oil.
- 2. Samples 96-013-1,2,5,6 and 7 were specified to have been representative of previously spilled oil. Analysis indicates:
- a. Samples 96-013-1,2,5 and 6 are similar and contain a severely biodegraded and evaporatively weathered heavy fuel oil mixed with lubricating oil.
- b. Sample 96-013-7 contains only traces of a severely biodegraded heavy fuel oil mixed with lubricating oil. The characteristics of sample 96-013-7 are similar to those expected for a severely weathered version of samples 96-013-1,2,5 and 6.
- 3. Suspected source sample 96-097-2 is observed to contain a severely biodegraded and evaporatively weathered heavy fuel oil mixed with lubricating oil. The characteristics are similar to those of the heavy fuel oil component of the spilled oil. However, this sample contains signficantly less lubricating oil than the spill samples.
- 4. Suspected source sample 96-097-5 is observed to contain a heavy fuel oil with characteristics different from those of the spilled oil.
- 5. Suspected source sample 96-097-1 is observed to contain only traces of petroleum oil. Results are of no value for comparison purposes.

CONCLUSIONS:

- 1. Comparison of spill samples 96-097-3 and 4 is inconclusive because they do not contain a sufficient quantity of petroleum oil for comparison purposes.
- 2. Suspected source sample 96-097-2 and the spill samples 96-013-1,2,5,6 and 7 are closely related and appear to be derived from common sources of petroleum oil. Sample 96-097-2 appears to represent another portion of spilled oil, rather than the origin of the spill. The difference in the proportion of lubricating oil indicates that more than one source is probably responsible for the problem. Biodegradation, as noted in these oil samples, is characteristic of oil that has been retained in a contaminated environment for an extended period of time. The source from which sample 96-013-8 (previously discussed in case 96-013) was collected is a likely source of the fuel oil portion of the spilled oil.
- 3. Suspected source sample 96-096-5 is not derived from a common source of the spilled oil. $\mathcal{L}_{\mathcal{A}}$
- 4. Comparison of suspected source sample 96-097-1 is inconclusive because they do not contain a sufficient quantity of petroleum oil for comparison purposes.

Manthas Hendrick

U. S. COAST GUARD

MARINE SAFETY LABORATORIES

MSL CASE #: 96-097

REQUESTOR MSO PUGET SOUND UNIT CASE MC95015622

METHOD OF DELIVERY: CERTIFIED MAIL

TRACKING #: P 902 422 199

FPN: 13-6001

DATE MAILED: 07-Dec-95 DATE RECEIVED: 14-Dec-95 SAMPLES TAMPERED WITH?

No CRIMINAL? No No

SAMPLES E	BROKE	N?	No	SAMPLE	S LEAP	KING?	No	NETS?	No	CRIMI	NAL?	No
MSL#			DE	SCRIPTIC	N			DATE	TIMETA	AKEN	SPIL	L/SOURCE
96-097-1	WELL ON RIGHT SIDE OF ROAD NEAR FE LINE MOBIL WELL							E 06 DEC 95 1200			SOURCE	
96-097-2	2			INSIDE O		NMENT A	REA		06 DEC	95 1225	S	OURCE '
96-097-3	3	FROM V	VATER	OUTLET A	AT DUNI	LAP TOW	'ING		06 DEC	95 1340		SPILL
96-097-4	4	SAMPLE	OF OL	JTFALL AT	T DUNL/	AP TOWII	NG		06 DEC	95 1345		SPILL
96-097-5	5	NO 3 TA YARD #		OTT PAPE	R IN CO	MAIATAC	ENT		06 DEC	95 1315		
33 33. 3	To be a second reason of the s											DURCE
							,					
				***					·			
	to being a special and a speci							Transportation on the value of				

REMARKS: COMPARE TO CASE 96-013

Samples checked in by: James J. Brigg	Date:	15 DEC 95
Sample Custodian:	Date:	1505095
Supervisor of analysis: Manthas Hendrick	Date:	18 Dec 95

PAGE: 1 OF:

From: Zommanoine Officor, marine SAFETY OFFICE PAGET SOUND
To: Commanding Officer, Marine Safety Laboratories
Subj: REQUEST FOR OIL SAMPLE ANALYSIS
1. Request analysis of the S samples listed on attached Chain of Custody Record to assist in our investigation of spill case FPN 13 6001 MC45015622
(Federal Project Number and Marine Casualty "MC" number)
2. Questions concerning this case should be directed to BM2 CHRIS P. SCARBORRY COMMERICAL#266-2(7-6232.
3. The spill samples were collected from Schercuspall, Mobile. WEIL, AMORICAN DISTRIBUTION WELL, FARTANK (river, outfall, shore, etc)
4. Estimated number of gallons spilled 50; Estimated cost of cleanup 35,000.
5. Wind conditions:mild breeze;Very Windy; X Calm.
6. Air Temperature:below 32F; \(\square 32\) to 60F;60 to 85F85 to 95F;over 95F.
7. Sky conditions:Overcast;Bright Sun;Rain;
8. Spill involves seepage of oil through the soil: XYes No. If Yes, estimated distance to the nearest possible suspected source:
9. List any possible non-petroleum contamination sources in the area NonE
10. Are all samples involved in this case being sent to the laboratory? (5) If not, explain
•
11. Have all possible suspect sources been sampled, If NO, include a detailed explanation of possible sources not sampled. Provide any additional information about the samples or overall situation which may be helpful to lab personnel:
12. Specify prosecution type: X Class 1; Class 2; DOJ.
MST3 DON LAISUNG
C-2

UNITED STATES COAST GUARD CHAIN OF CUSTODY RECORD

			MARINE SAFETY OFFICE PUGET SOUND 1519 ALASKAN WAY SOUTH SEATTLE, WA. 98134-1192							
SPILL	SOURCE	SAMPLE NO.	DESCRIPTION OF SAMPLES FOR CASE# m<95615622							
	××レ	I	WELL ON RIGHT SIDE OFROMO WEAR							
	XXX	2	BACK NE WELL INSIDE CONTAINMENT ARM							
XXX		3	FROM WATER OUTLET AT DUNLAP TOWING							
XXX		4	From water outlet At Dunlap towing							
	×××	5	FROM CONTAINER YARD AT SCOTT PAPOR #3 TANK CONTAINS #6 FUEL SIL							
	; ; ; ; ; ;									
PERSO	ON ASSUM	IING RESPON	SIBILITY FOR SAMPLES TIME/DATE							
SAMPI NUMBE	Bm2	INQUISHED C.P.Scheborg INQUISHED	TIME DON LAISUNE, USTS 1654 REASON FOR CHANGE							
1-5	Dor	LAISUNE, US,								
SAMPI NUMBE	TR O	inquished in P.Scol	TIME OF CUSTODY 12-7-95- Round Reperier, 40ec							
SAMPI NUMBE		INQUISHED	BY: DATE/ RECEIVED BY: DATE/ REASON FOR CHANGE TIME OF CUSTODY							

SAMPLE PREPARATION SHEET

COIL CASE NUMBER: 96-097			
Oil samples were obtained using preparation samples were then placed into a vial and idenumber and sample number along with the corresponding to the corresp	responding preparati	JIL Case	
Oil samples eliminated by IR screening method	od:	11	
and the second s		4,00	
The Quality Control sample is a duplicate or	f sample: <u>96-697</u>	-2	
SAMPLE NUMBERS (sequential portion only)	PREPARATION CODE	RATIO	
13.4	5,7		
2.20	2		
5	3,7		
		·	
PREPARATION CO	DES		
1. Portion of neat sample taken from sample jar (cl			
2. Portion of sample taken from sample jar, anhydro	us MgSO4 added, then ce	ntrifuged.	
3. Portion of sample taken from sample jar, diluted with cyclohexane, anhydrous MgSO ₄ added, then centrifuged.			
4. Entire sample extracted with cyclohexane, anhydr			
5. Entire sample extracted with two separate 10 ml portions of cyclohexane, anhydrous MgSO ₄ added to the combined cyclohexane solution, then centrifuged.			
6. Cyclohexane Solution: ratio of oil to cyclohexan column.		n "ratio"	
7. Cyclohexane Solution of unknown concentration.			
8. Solvent evaporated with heat and a stream of N_2 .	Sample of unknown cor	icentration.	
9. Others:			
Preparer's Signature: Jung 7- Bright	Date: 150	11/95	
The state of the s		4	

QUALITY CONTROL SHEET

COLL CASE NUMBER: 96-097	DATE PREPARED: 15DEC 95
1. A Quality Control (QC) s	ample was analyzed along with the other
samples in this case.	3 3 90
The Quality Control (Q	c) is a duplicate of sample 96-897-2
Due to limited sample	quantity in all samples involved in the
case, reference oil	from the COIL Library
used for the Quality C	ontrol (QC) and it's duplicate sample.
Infrared Spectroscopy	used for screening samples before final
sample preparation. N	o QC sample available during IR screening
2. ANALYTICAL METHODS.	
	SAT ! N/A
INFRARED SPECTROSCOPY	
GAS CHROMATOGRAPHY	
FLUORESCENCE SPECTROSCOP	<u> </u>
GAS CHROMATOGRAPHY/MASS	SPECTROMETRY
a mba dama and conclusion	s for the QC and it's duplicate were
identical:	Yes_X No
COMMENTS:	

SUPERVISOR OF ANALYSIS: Marthad Hendrich

UNITED STATES COAST GUARD MARINE SAFETY LABORATORY

OIL SPILL IDENTIFICATION ANALYSES COST RECOVERY DOCUMENTATION

LABORATORY CASE NUMBER: 96-097

REQUESTOR: MARINE SAFETY OFFICE PUGET SOUND

UNIT CASE NUMBER: MC95015622

NUMBER OF SAMPLES: 05

COST PER SAMPLE PREPARED: \$20.00

TOTAL COSTS OF SAMPLE PREPARATION: \$100.00

NUMBER OF ANALYSES: 15

COST PER ANALYSIS: \$85.98

TOTAL COSTS FOR ANALYSIS: \$1289.70

TOTAL COSTS: \$1389.70

This documentation is provided for purposes of Phase IV - Documentation and Cost Recovery under the National Oil and Hazardous Substances Pollution Contingency Plan(40 CFR Part 300).

Marthad Hendorch

MARTHA S. HENDRICK DATE: 20DEC95 Chemist

OIL SPILL IDENTIFICATION SYSTEM (OIS)

RELEVANCE TO SPILL SOURCE DETERMINATION

Petroleum is a complex mixture of thousands of different organic compounds formed from a variety of organic materials that are chemically converted under differing geological conditions over long periods of time. The infinitely variable nature of these factors results in distinct chemical differences between oils formed under dissimilar conditions and/or environments. While oil from one crude oil field is readily distinguishable from another, differences in the makeup of oils from the same crude oil field can sometimes be observed as well. Refined oils are fractions usually derived by distillation of crude oil. Two refined oils of the same type differ because of dissimilarities in the characteristics of their crude oil feed stocks as well as variations in refinery processes and any subsequent contact with other oils mixed in during transfer operation from residues in tanks, ships, pipes, hoses etc... Thus, all petroleum oils, to some extent have chemical compositions that differ from each other.

The characteristic properties of an oil can be explored by a variety of analytical methods. The results of analysis by any of these methods can be presented in graph form. In general, when the graphical data for two oils produced by a particular method are compared, the differences between the graphs reflect differences between the oils.

The OIS System, developed during the mid-1970s at the Coast Guard Research and Development Center, is based on a multi-method approach to "fingerprinting" oils. In 1978, the Central Oil Identification Laboratory (COIL) was established as the operating facility to implement the OIS. In 1988, COIL was renamed the Marine Safety Laboratories (MSL), though the acronym COIL is still widely used. OIS is designed to determine the unique, intrinsic chemical properties of oils via analytical techniques and establish whether or not a common source relationship exists between samples of spilled oil and samples of oil from a suspected source. Since 1978, MSL/COIL has analyzed over 39,000 samples, involving more than 5,700 spill cases, in support of oil pollution investigations.

DATA PRODUCTION AND INTERPRETATION

Oil sample preparation, testing and storage are conducted in accordance with American Society for Testing and Materials (ASTM) consensus standards. MSL/COIL currently utilizes three primary analytical techniques: Gas Chromatography (GC) (ASTM D-3328), Fluorescence Spectroscopy (FL) (ASTM D 3650), Infrared Spectroscopy (IR) (ASTM D-3414), and Gas Chromatography-Mass Spectrometry (GC-MS) (ASTM D-5739) that is used as a complementary analytical method. A rigorous laboratory quality assurance program monitors both instrument performance and sample preparation to ensure that data are accurate and reproducible.

All samples in a given case are initially analyzed by one method to determine the class of petroleum product. Samples can be excluded from further analysis based on results from the initial analysis. Further analyses are performed on samples which are potential matches to the source of the oil.

The Supervisor of Analysis interprets the data from all test methods performed and draws conclusions concerning whether or not certain spilled oil and suspected source samples were derived from the same chemical source. Data interpretation in oil spill source identification is non-trivial and fundamentally different from typical chemical analyses because the chemical properties of spilled oil are altered when oil is introduced into the environment. From the moment oil enters the environment, evaporation, dissolution, photochemical oxidation, biodegradation and other forces begin to alter the oil's châracteristics or "fingerprint". These combined processes are termed weathering and can significantly complicate data interpretation. Contamination of the spilled oil with other oils or substances is another complicating factor. The experienced oil spill analyst is familiar with the complexities of the weathering processes and is able to distinguish real differences between two oils from those apparent differences resulting from weathering alterations. Interferences from contaminants can usually be recognized as such and discounted when weighing the test results. However, at times, severe weathering and/or contamination can mask many of the inherent differences between oils of a similar type.

REPORTING

The typical MSL/COIL OIS Report consists of four parts: case identifying information, a listing of analysis techniques performed, the results section and the conclusions section. The results section describes the types of petroleum observed in the samples provided, and comments on chemical similarities or dissimilarities between spill samples and/or between spill and suspected source samples. In all cases the Supervisor of Analysis bases the written results on interpretations from the aggregate of all data generated.

The conclusions section establishes whether or not a common source relationship exists between samples of spilled oil and samples of oil from a suspected source. There are two outcomes most frequently found in the conclusions section of the typical MSL/COIL OIS Report: "derived from a common source" and "not derived from a common source". However, to maintain the high degree of reliability for both "common source" and "not a common source" determinations, it is necessary to exclude some comparisons from these categories. Oil spill cases vary widely in possible explanations for why a determination could not be made. Instead of using only a statement of "inconclusive", the comments will concisely explain the reason for the outcome for each individual case. For example, some sources are highly inhomogeneous, and a sample of such a spill may not reflect the composition of the product remaining in such a source. The spill may contain very little oil, or it may be excessively weathered or contaminated. Of important note, MSL/COIL conclusions address chemical comparisons and not physical aspects of evidence. Additionally, chemical evidence provided in a MSL/COIL conclusion that is other than "common source" might still be used by the investigating officer, when combined with physical evidence to establish a preponderance of the evidence argument against an alleged responsible party.

MSL/COIL OIS Reports are submitted to Marine Safety Offices (MSO's) for inclusion, as chemical evidence, in Marine Violation/Casualty Reports. The outcomes in the conclusions section of the OIS Report define the nature of the chemical evidence provided. MSO personnel are advised to combine the chemical evidence provided in the MSL/COIL OIS Reports with physical and circumstantial evidence developed during the investigation when writing Marine Violation Reports. Inquiries challenging the technical content of MSL/COIL OIS Reports by representatives of the alleged responsible party should be handled at the Hearing Officer level. Explicit guidance describing the communications process between the Hearing Officer and the MSL/COIL Supervisor of Analysis on technical issues involving chemical evidence is given in Commandant (G-LMI) memorandum 16460 dated 26 January 1981.

PERSONNEL QUALIFICATIONS

MSL/COIL laboratory technicians performing sample preparation and testing are graduates of the Coast Guard Marine Science Technician School. Each MSL/COIL technician has successfully completed a comprehensive training program at the MSL/COIL facility. Additionally, many have received supplemental training at leading civilian institutions in their specialty area.

The Supervisor of Analysis monitors all aspects of the analysis, certifies and interprets the test results, and prepares the final MSL/COIL report. This individual is a professionally trained chemist experienced in oil spill source identification. Individuals currently qualified to perform this function are:

Lieutenant Commander Kristy L. Plourde, U.S. Coast Guard Commanding Officer

B.S. Physical Sciences, 1983, US Coast Guard Academy M.S. Chemistry, 1989, University of Connecticut

Dr. Martha Hendrick

Chemist

B.A. Chemistry, 1969, Rhodes College

M.A. Education, 1974, Stanford University

Ph.D. Analytical Chemistry, 1985, University of Connecticut Chair, ASTM Subcommittee D19.31, Waterborne Oils

REFERENCES

A more technical description of the OIS is contained in Report CG-D-52-77 "Oil Spill Identification System", Final Report, June 1977, USCG R&D Center. This document is available through the National Technical Information Service, Springfield, VA 22161.

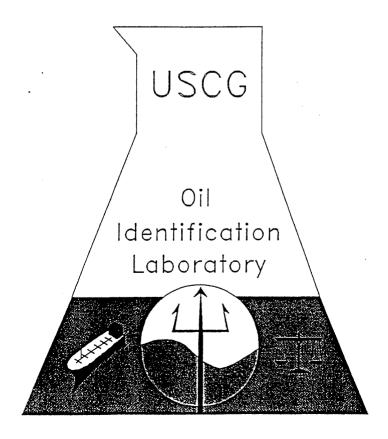
For information concerning the ASTM standards used in Oil Spill Identification, consult "Oil in the Environment", Martha S. Hendrick, Ph.D., ASTM Standardization News, April 1991.

For additional information regarding the applicability of the Coast Guard's OIS, see "Chemical Identification of Oil Spill Sources", Allen P. Bentz, Ph.D., The Forum, Volume XIII, Number 2, Winter 1978. Dr. Bentz is a research scientist at the Coast Guard Research and Development Center and a recognized expert in the field of oil spill source identification. He has been closely involved with most of the development work leading to the present state-of-the-art.

OIL SAMPLE ANALYSIS REPORT

MARINE SAFETY OFFICE PUGET SOUND CASE NUMBER MC95015622

MARINE SAFETY LABORATORY CASE NUMBER 96-117





Commanding Officer
U. S. Coast Guard
Marine Safety
Laboratories

1082 Shennecossett Road Groton, CT 06340-6094 Phone: (860) 441-2645 Fax: (860) 441-2641

16400

JAN 16 1996

From: Commanding Officer, Marine Safety Laboratories

To: Commanding Officer, Marine Safety Office Puget Sound

Subj: OIL SAMPLE ANALYSIS REPORT, MSO PUGET SOUND CASE# MC95015622

MSL CASE #96-117

1. The laboratory analysis of this case has been completed and our report is forwarded. The technical data supporting the report (spectrograms and chromatograms) have been archived at our facility and are available upon request. We will maintain the oil samples in refrigerated storage pending final case disposition.

2. Questions concerning this report or the analytical methods used should be directed to the Supervisor of Analysis, LCDR Plourde.

K. L. PLOURDE

Encl: (1) MSL Report 96-117

(2) OIS Addendum

UNITED STATES COAST GUARD MARINE SAFETY LABORATORIES OIL IDENTIFICATION LABORATORY

OIL SPILL IDENTIFICATION REPORT

LABORATORY CASE NUMBER: 96-117

REQUESTOR: MARINE SAFETY OFFICE PUGET SOUND

UNIT CASE NUMBER: MC95015622

RECEIVED: 12JAN96 VIA: CERTIFIED MAIL (# P 902 422 187)

NUMBER OF SAMPLES: FIVE (05) LAB NO. OF SPILLS: 96-117-1

LAB NO. OF SUSPECTS: 96-117-3, 4 AND 5

LAB NO. OF CLEAN WATER: 96-117-2

ANALYSIS METHODS:

GAS CHROMATOGRAPHY (GC)

RESULTS:

- 1. Sample 1 was specified to have been representative of spilled oil. Analysis indicates that it contains a slightly weathered and severely biodegraded petroleum oil.
- 2. Suspected source samples 3, 4, and 5 are observed to contain heavy fuel oils with characteristics different than those observed for the spilled oil sample.
- 3. Sample 2 was designated as a clean water sample. No petroleum oil was detectable by Gas Chromatography.

CONCLUSIONS:

- 1. Because of the severely biodegraded condition of spill sample 1, comparison with suspected source samples 3, 4 and 5 is inconclusive. Suspected source samples 3, 4, and 5 do not appear to be the source of spill sample 1. The slightly weathered and severely biodegraded condition of sample 1 is characteristic of an oil that has been retained in a contaminated environment, such as soil, for an extended period of time.
 - 2. Sample 2 represents essentially oil-free water.

SUPERVISOR OF ANALYSIS K. L. PLOURDE, LCDR, USCG DATE: 16JAN96
Commanding Officer/Chemist

UNITED STATES COAST GUARD OIL IDENTIFICATION LABORATORY

SAMPLE CHECK-IN LOG, COIL CASE NUMBER: 96-117

REQUESTOR: MSO PUGET SOUND UNIT CASE#: MC95015622

MET	HOD OF DELIVERY		DATE RECEIVED
XXXXXXXXX/CERTIFIED MAIL	MESSENGER	OTHER	
NUMBER DATE MAILED O/A	and the second s	4	- - - - - - - - - -
P 902 422 187; 09 JAN 96			<u> 12 JAN 96 </u>

Samples were observed to be: broken NO, tampered with NO, leaking YES, or subject to contamination NO. For these and other unusual conditions, place an asterisk (*) next to the sample(s) in question and describe condition of sample(s) in remarks below.

LAB NO.	SAMPLE DESCRIPTION	SPILL	SUSPECT
LAB NO.	[1] OIL RECOVERED IN THE WATER		1
96-117-1	08 JAN 96 1503	XXXXX	<u> </u>
	[2] FRESH WATER SAMPLE	.	!
96-117-2	08 JAN 96 1529	XXXXX	<u> </u>
	[3] PIPE OUTSIDE PUMP STATION O8 JAN 96 1400		XXXXX
96-117-3 **	[4] SOUTH WALL FUEL YARD MIDDLE		l AAAAA
96-117-4	! 08 JAN 96 1410		XXXXX
90-11/-4	[5] MIDDLE SOUTH WALL STAND PIPE		!
96-117-5	08 JAN 96 1415		XXXXX
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REMARKS:	96-117-4 WAS RECEIVED LEAKING		
^^ SAMPLE	YO-II-04 WAS RECEIVED DEARING		

Samples checked-in by:	Date:	12 Jan (-)6
Sample Custodian:	Date:	17 TAN 46
Supervisor of Analysis: Ke Plondo	Date:	167AN96

PAGE 1 OF 1 PAGES

From: Commading OFFICER, MARINE SAFETY OFFICE HIGET Some
To: Commanding Officer, Marine Safety Laboratories
Subj: REQUEST FOR OIL SAMPLE ANALYSIS
1. Request analysis of the samples listed on attached Chain of Custody Record to assist in our investigation of spill case 13-6001 mc95015622 (Federal Project Number and Marine Casualty "MC" number)
2. Questions concerning this case should be directed to Bm 2 CHRIS P. SCARGORRY COMMERICAL# 206 217-6232
3. The spill samples were collected from ONTFALL, BAY, SAWERP, PORCE
(river, outfall, shore, etc)
4. Estimated number of gallons spilled 360; Estimated cost of cleanup 10,000.
5. Wind conditions:mild breeze;Very Windy; Calm.
6. Air Temperature:below 32F; 32 to 60F; 60 to 85F 85 to 95F;over 95F.
7. Sky conditions: X Overcast; Bright Sun; Rain; Other (specify) RIT PARTLY Survy
8. Spill involves seepage of oil through the soil: Yes No. If Yes, estimated distance to the nearest possible suspected source:
9. List any possible non-petroleum contamination sources in the area $-\infty$
10. Are all samples involved in this case being sent to the laboratory? YES If not, explain
11. Have all possible suspect sources been sampled, YCS If NO, include a detailed explanation of possible sources not sampled. Provide any additional information about the samples or overall situation which may be helpful to lab personnel:
NUED MOST ALURATE TEST DOPE, NUED GAS.
CHROMATOGRAPHY SONT TO MATT FOR SCOLOGY STUDY.
12. Specify prosecution type:Class 1;Class 2;DOJ.
(SIGNATURE) C-2
- -

UNITED STATES COAST GUARD CHAIN GEAGUSTGUFREGERD U.S. COAST GUARD

			U.S. COAST GUARD		
(UNIT	AND AD	DRESS)*****	FORT SOUND 1519 ALASKAN WAY SOUTH SEATTLE, WA. 98134-1192		
SPILL	SOURCE	SAMPLE NO.	DESCRIPTION OF SAMPLES FOR CASE# MC95015622		
沐木		1	DIL RECOVERED FROM WATER		
XXX	! !	2	FRESHWATER SAMPLE 160 YAKIDS FACIN SPILL		
	XXX	3	PIPE OUTSIDE Pump Station		
	XXX	4	South WALL FUEL YARD MIDDLE		
	XXX	5	South WALL FUEL YAND STAND PIPÉ		
	1				
,					
	1				
			1 1 1 1		
PERSO	ON ASSUM	MING RESPON	SIBILITY FOR SAMPLES TIME/DATE		
SAMPI NUMBI		INQUISHED	BY: DATE/ RECEIVED BY: DATE/ REASON FOR CHANGE TIME VOTSCAISURE TIME OF CUSTODY STATE 1800 MCT?		
SAMPI NUMBE	LE REI	14PSedur LINQUISHED 513 LAISURE	DATE/ RECEIVED BY: DATE/ REASON FOR CHANGE TIME TIME OF CUSTODY SMALL Ship BM2 Sender 6700 To Coil		
SAMPI NUMBI		INQUISHED			
SAMPI	-	LINQUISHED	BY: DATE/ RECEIVED BY: DATE/ REASON FOR CHANGE		
	i				

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CODE: R = Return Receipt F RW = Returned to Writer. Do	Requested OS C = Received in	= Officially Sealed. RE = Re-env n Damaged Condition.	eloped. SD = Special Delivery.	,	Postmark Office C
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PS Form 3883, March 1991

*U.S. Government Printing Office: 1992 — 323-151

COIL CASE NUMBER: 16-17 D	ATE PREPARED: 🔼)AN TE
Oil samples were obtained using preparation samples were then placed into a vial and id number and sample number along with the cor	responding preparat	below. T OIL case ion code(
Oil samples eliminated by IR screening meth		-
The Quality Control sample is a duplicate o	of sample: 96-1/7	-3.
SAMPLE NUMBERS (sequential portion only)	PREPARATION CODE	RATIO
145	3,7	
	47	
3 01.		
7 1 3 3		
PREPARATION CO	DDES	
1. Portion of neat sample taken from sample jar (c	lean fuel oils).	
2. Portion of sample taken from sample jar, anhydr	ous MgSO ₄ added, then o	centriluged
3. Portion of sample taken from sample jar, dilute added, then centrifuged.		
4. Entire sample extracted with cyclohexane, anhyd	irous MgSO ₄ added, then	centriluge
5. Entire sample extracted with two separate 10 ml MgSO ₄ added to the combined cyclohexane solution, t		
6. Cyclohexane Solution: ratio of oil to cyclohexa column.	nne is known and shown	in "ratio"
7. Cyclohexane Solution of unknown concentration.		
8. Solvent evaporated with heat and a stream of N.	2. Sample of unknown c	oncentratio
9. Others:		
The signature Vine G. Valence	Date: [2]	SANGL
Preparer's Signature: //www.		

Revised 4/95

QUALITY CONTROL SHEET

	•
COIL CASE NUMBER: 96-117 DA	TE PREPARED: 12 JAN96
1. A Quality Control (QC) sample was a	analyzed along with the other
samples in this case.	0/ 1/7-3
The Quality Control (QC) is a dur	plicate of sample 16-117
Due to limited sample quantity in	n all samples involved in the
case, reference oil	from the COIL Library v
used for the Quality Control (QC	
Infrared Spectroscopy used for se	creening samples before final
Infrared Spectroscopy used for so	e available during IR screening
sample preparation. No QC sample	e avaitable during in serse-
2. ANALYTICAL METHODS.	
	SAT ! N/A
	\downarrow \downarrow $\bar{\downarrow}$
INFRARED SPECTROSCOPY	
GAS CHROMATOGRAPHY	<u>\</u>
FLUORESCENCE SPECTROSCOPY	
GAS CHROMATOGRAPHY/MASS SPECTROMETI	RY
GAD GIMCHILL GULLS SOL,	
	oc and it's duplicate were
3. The data and conclusions for the	OC and it a dubited to work
identical:	
Yes	No
COMMENTS:	

Heplande DATE: 167/11

UNITED STATES COAST GUARD MARINE SAFETY LABORATORIES OIL IDENTIFICATION LABORATORY GAS CHROMATOGRAPHY (GC) WORKSHEET

Case Number: 16-117 Instrument: ANA 2 Date of Analysis: 16 JANY6 cyclo-Comparison Spills hexane soln (unk. conc.) I I 1. Method/Analytical Conditions: ASTM D 3328 SOP: MSLINST 5200.8 Column Used FROND/ REAR HP program used: Column: DB-5, 30m x 0.32mm ID COIL Method Film Thickness: 0.1 micron
Column Number: 3768743 GAS Method OTHER: __ 2. Sample Preparation: Solvent: Cyclohexane Concentration: ______Other: _____Other: _____Other: _____Other: 3. Comments: Do comparisons show all spill samples the same? ___ Yes ___ No \succeq N/A Supervisor:

10/95 gcwk.doc

שמנם דודב: C. \mrCmmn1 \&\Dmin\\\++&\ 9:59:13 PM Seq. Line: Injection Date: 1/12/96 Vial No.: Acq. Method: OIL1.M Inj. No.: 1 Operator: 96-081-BLANK Inj. Vol.: not available Sample Name: Comments: 2400 2100 **7** 5 20 25

Seq. Line: Injection Date: 1/12/96 8:52:03 PM Vial No.: Acq. Method: OIL1.M Inj. No.: Operator: 96-117-QC Inj. Vol.: not available Sample Name: Comments: 5 15 20 30

Sample Name: 96-117-QC

vala riic. Injection Date: 1/12/96 3:16:33 PM Acq. Method: OIL1.M Operator:

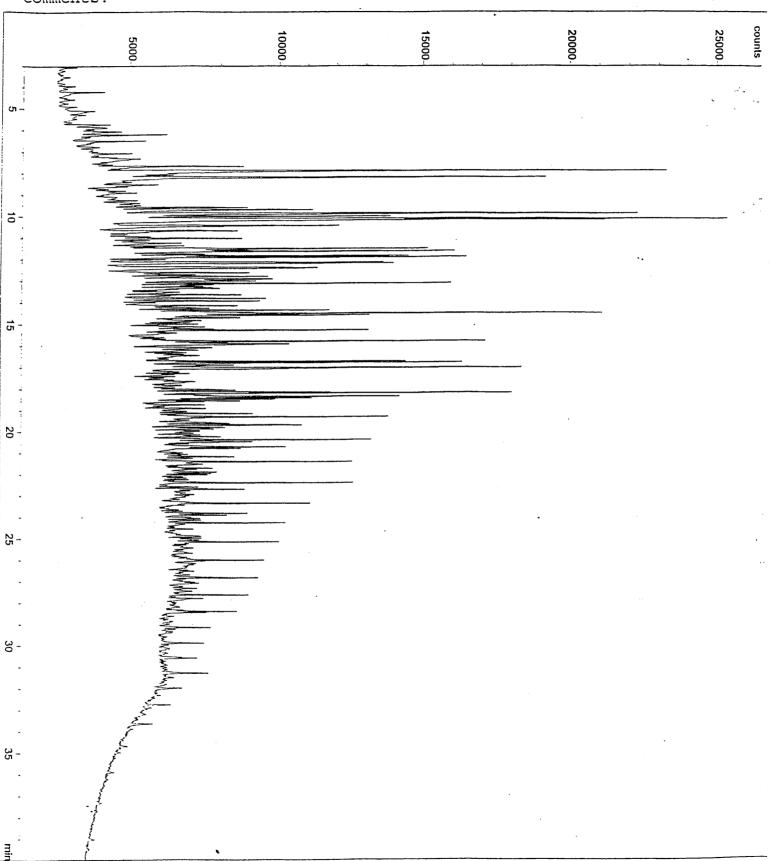
Seq. Line: Vial No.: 2 Inj. No.: 1

Sample Name: 96-117-03, QCM

96-117-03, QCM Sample Name:

Inj. Vol.: not available

Comments:



Data File. Seq. Line: 1/12/96 4:23:38 PM Injection Date: Vial No.: 3 Acq. Method: OIL1.M Inj. No.: 1 Operator: Inj. Vol.: not available Sample Name: 96-117-01, SPILL Comments: 10000

5

15

20

25

30 -

Data Fire. Seq. Line: Injection Date: 1/12/96 5:30:45 PM Vial No.: OIL1.M Acq. Method: Inj. No.: Operator: 96-117-02, SPILL Inj. Vol.: not available Sample Name: Comments: 2100-10 15

25

Injection Date:

Acq. Method: Operator:

Sample Name:

OIL1,M

1/12/96 6:37:49 PM

Seq. Line: Vial No.:

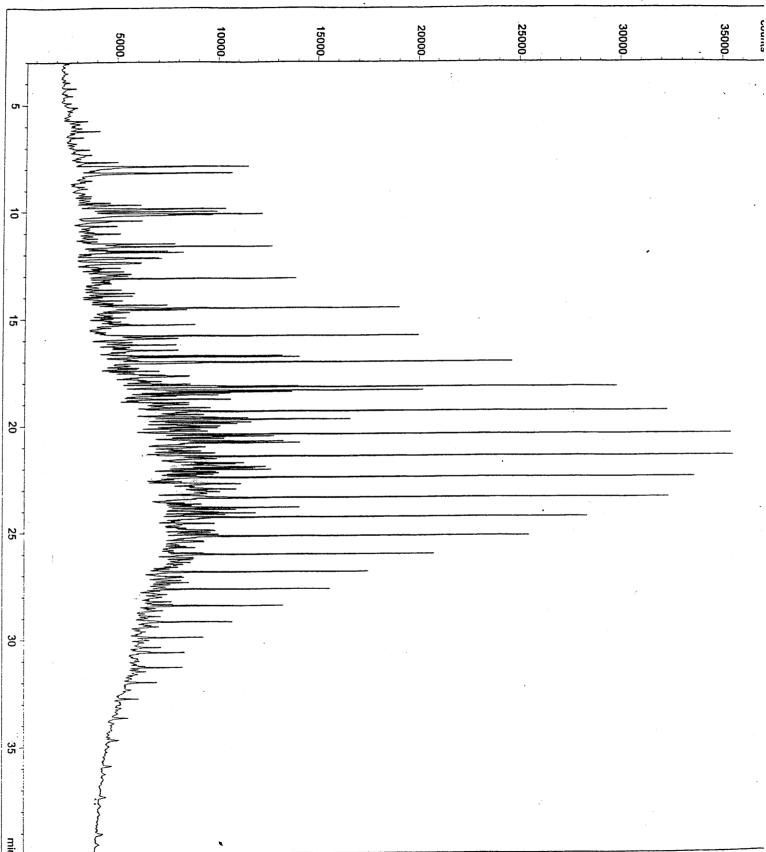
Sample Name: 96-117-04

Inj. No.:

96-117-04

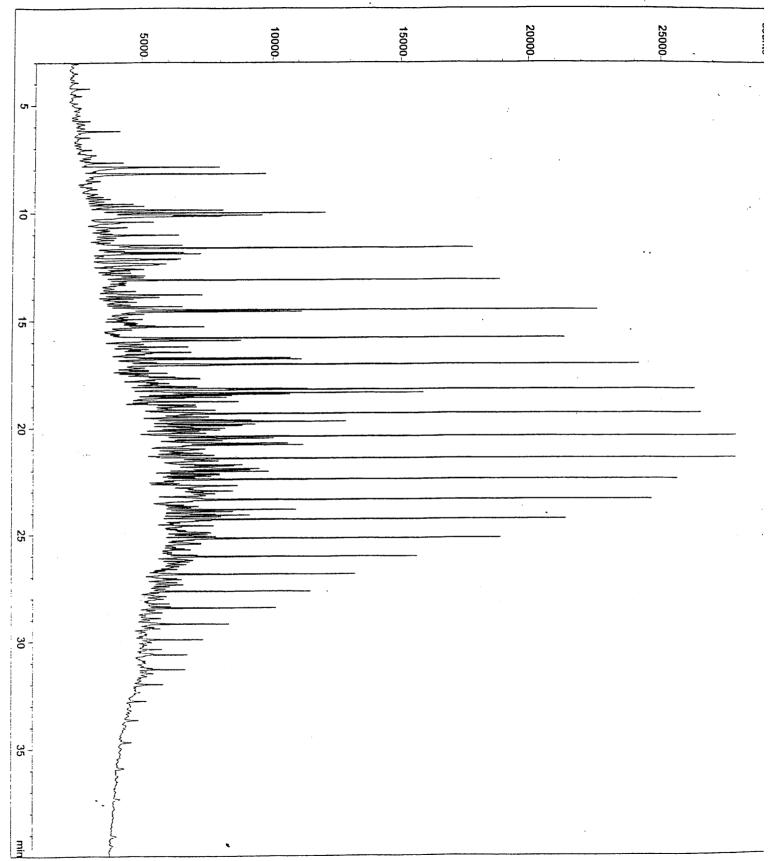
Inj. Vol.: not available

Comments:



Data File: C:\HPCHEM1\2\DATA\0112\96-11706.D Seq. Line: 1/12/96 7:44:55 PM Injection Date: OIL1.M, Vial No.: Acq. Method: Inj. No.: Operator: Inj. Vol.: not available 96-117-05 Sample Name:

Comments:



Sample Name: 96-117-05

UNITED STATES COAST GUARD MARINE SAFETY LABORATORY

OIL SPILL IDENTIFICATION ANALYSES COST RECOVERY DOCUMENTATION

LABORATORY CASE NUMBER: 96-117

REQUESTOR: MARINE SAFETY OFFICE PUGET SOUND

UNIT CASE NUMBER: MC95015622

NUMBER OF SAMPLES: 05

COST PER SAMPLE PREPARED: \$20.00

TOTAL COSTS OF SAMPLE PREPARATION: \$100.00

NUMBER OF ANALYSES: 06

COST PER ANALYSIS: \$85.98

TOTAL COSTS FOR ANALYSIS: \$515.88

TOTAL COSTS: \$615.88

This documentation is provided for purposes of Phase IV - Documentation and Cost Recovery under the National Oil and Hazardous Substances Pollution Contingency Plan(40 CFR Part 300).

K. L. PLOURDE DATE: 16JAN96

Commanding Officer

OIL SPILL IDENTIFICATION SYSTEM (OIS)

RELEVANCE TO SPILL SOURCE DETERMINATION

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The typical MSL/COIL OIS Report consists of four parts: case identifying information, a listing of analysis techniques performed, the results section and the conclusions section. The results section describes the types of petroleum observed in the samples provided, and comments on chemical similarities or dissimilarities between spill samples and/or between spill and suspected source samples. In all cases the Supervisor of Analysis bases the written results on interpretations from the aggregate of all data generated.

The conclusions section establishes whether or not a common source relationship exists between samples of spilled oil and samples of oil from a suspected source. There are two outcomes most frequently found in the conclusions section of the typical MSL/COIL OIS Report: "derived from a common source" and "not derived from a common source". However, to maintain the high degree of reliability for both "common source" and "not a common source" determinations, it is necessary to exclude some comparisons from these categories. Oil spill cases vary widely in possible explanations for why a determination could not be made. Instead of using only a statement of "inconclusive", the comments will concisely explain the reason for the outcome for each individual case. For example, some sources are highly inhomogeneous, and a sample of such a spill may not reflect the composition of the product remaining in such a source. The spill may contain very little oil, or it may be excessively weathered or contaminated. Of important note, MSL/COIL conclusions address chemical comparisons and not physical aspects of evidence. Additionally, chemical evidence provided in a MSL/COIL conclusion that is other than "common source" might still be used by the investigating officer, when combined with physical evidence to establish a preponderance of the evidence argument against an alleged responsible party.

MSL/COIL OIS Reports are submitted to Marine Safety Offices (MSO's) for inclusion, as chemical evidence, in Marine Violation/Casualty Reports. The outcomes in the conclusions section of the OIS Report define the nature of the chemical evidence provided. MSO personnel are advised to combine the chemical evidence provided in the MSL/COIL OIS Reports with physical and circumstantial evidence developed during the investigation when writing Marine Violation Reports. Inquiries challenging the technical content of MSL/COIL OIS Reports by representatives of the alleged responsible party should be handled at the Hearing Officer level. Explicit guidance describing the communications process between the Hearing Officer and the MSL/COIL Supervisor of Analysis on technical issues involving chemical evidence is given in Commandant (G-LMI) memorandum 16460 dated 26 January 1981.

PERSONNEL QUALIFICATIONS

MSL/COIL laboratory technicians performing sample preparation and testing are graduates of the Coast Guard Marine Science Technician School. Each MSL/COIL technician has successfully completed a comprehensive training program at the MSL/COIL facility. Additionally, many have received supplemental training at leading civilian institutions in their specialty area.

The Supervisor of Analysis monitors all aspects of the analysis, certifies and interprets the test results, and prepares the final MSL/COIL report. This individual is a professionally trained chemist experienced in oil spill source identification. Individuals currently qualified to perform this function are:

Lieutenant Commander Kristy L. Plourde, U.S. Coast Guard Commanding Officer

B.S. Physical Sciences, 1983, US Coast Guard Academy

M.S. Chemistry, 1989, University of Connecticut

Dr. Martha Hendrick

Chemist

B.A. Chemistry, 1969, Rhodes College

M.A. Education, 1974, Stanford University

Ph.D. Analytical Chemistry, 1985, University of Connecticut Chair, ASTM Subcommittee D19.31, Waterborne Oils

REFERENCES

A more technical description of the OIS is contained in Report CG-D-52-77 "Oil Spill Identification System", Final Report, June 1977, USCG R&D Center. This document is available through the National Technical Information Service, Springfield, VA 22161.

For information concerning the ASTM standards used in Oil Spill Identification, consult "Oil in the Environment", Martha S. Hendrick, Ph.D., ASTM Standardization News, April 1991.

For additional information regarding the applicability of the Coast Guard's OIS, see "Chemical Identification of Oil Spill Sources", Allen P. Bentz, Ph.D., The Forum, Volume XIII, Number 2, Winter 1978. Dr. Bentz is a research scientist at the Coast Guard Research and Development Center and a recognized expert in the field of oil spill source identification. He has been closely involved with most of the development work leading to the present state-of-the-art.

APPENDIX C

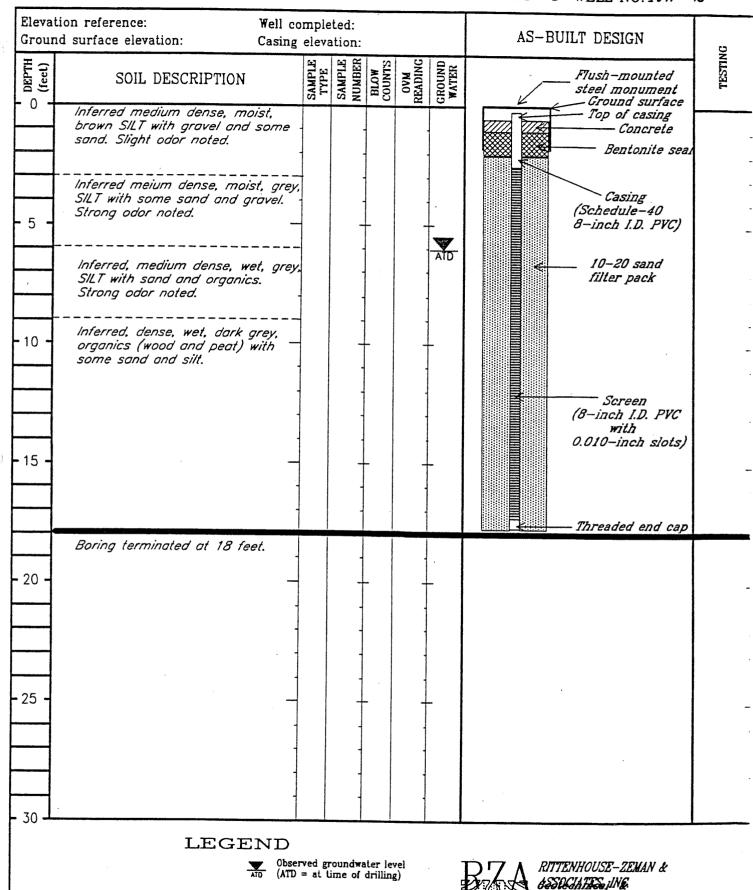
Boring Logs, Monitoring Well Logs, and Test Pit Logs

Appendix B

Lithologic Logs

10.01

Environmental Consultants



Drilling started: 07 November 1991 Drilling completed: 07 November 1991 Logged by: JK

SAMPLING

I 2' OD SPLIT SPOON SAMPLE

3' OD SHELBY SAMPLE

2.5' ID RING SAMPLE

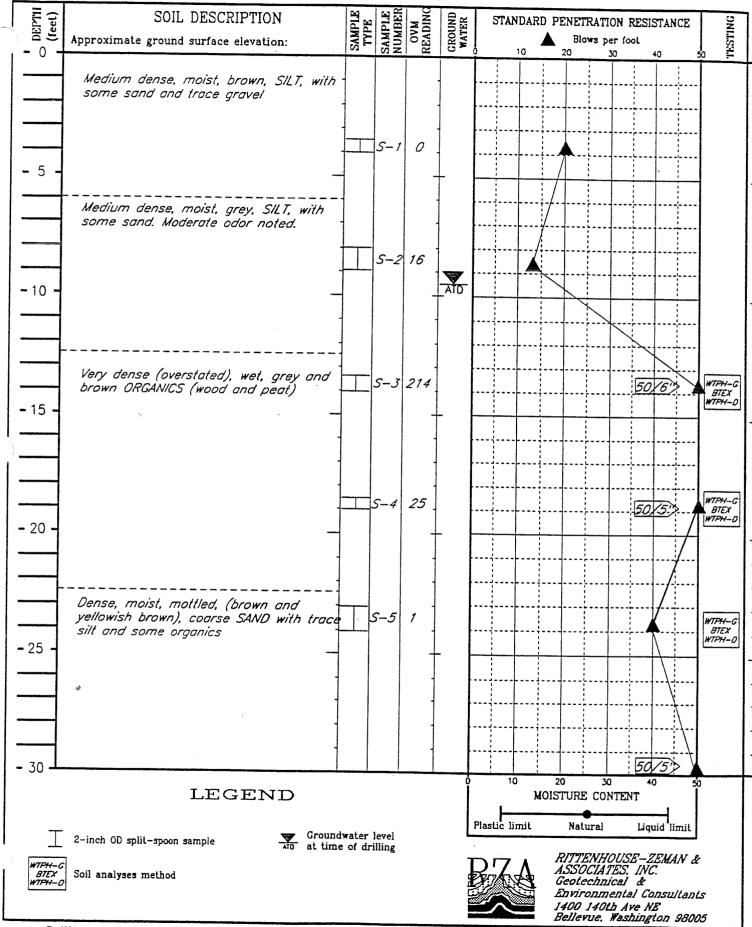
BULK SAMPLE

* SAMPLE NOT RECOVERED

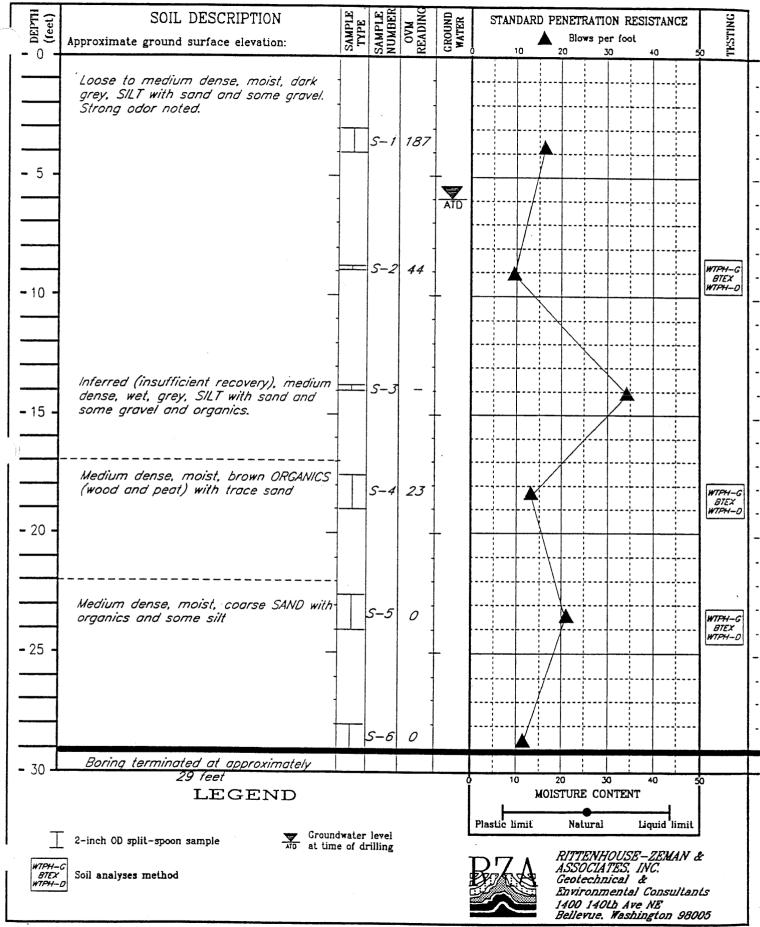
GROUND WATER SEAL
DATE
WATER LEVEL TO OBSERVATION
WELL TIP

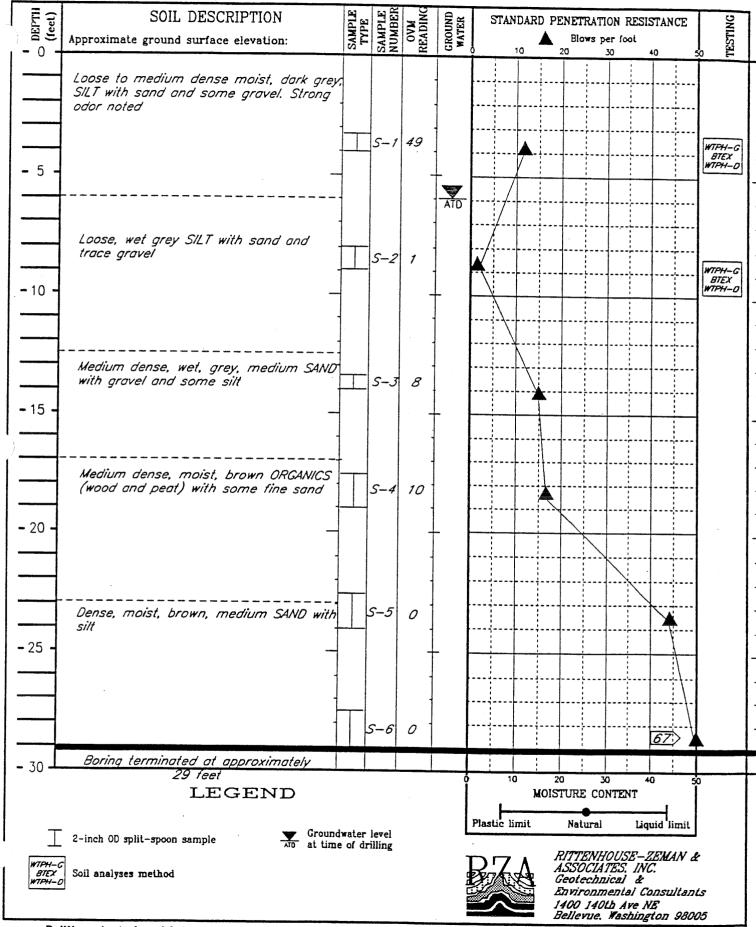
35

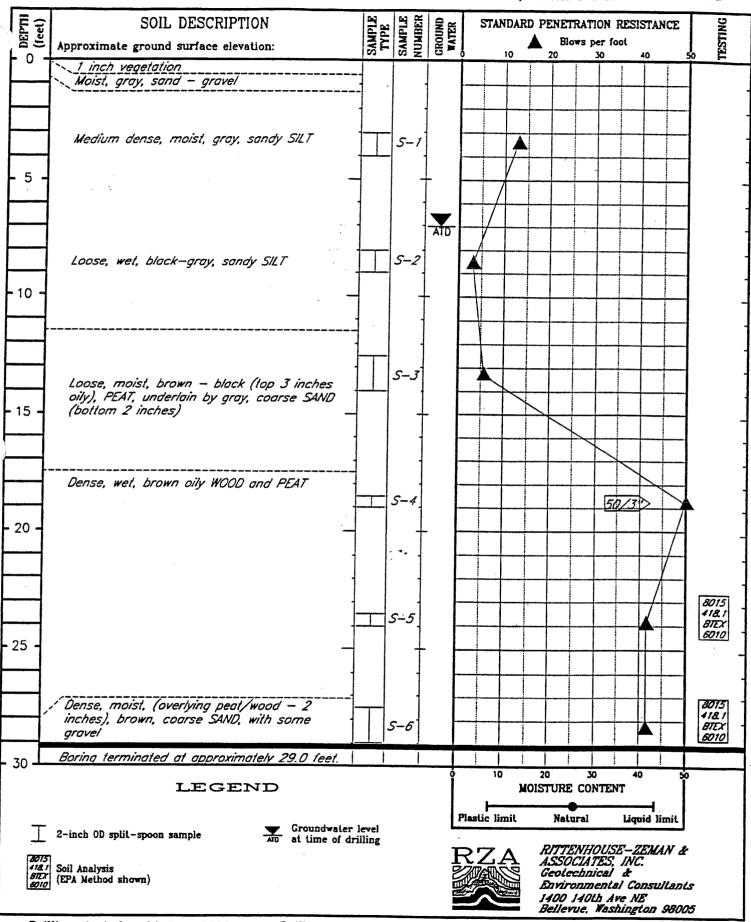
 $^{\perp}$ PLASTIC LIMIT



Creet)	SOIL DESCRIPTION		SAMPLE	SAMPLE NUMBER	OVM READING	GROUND	STANDARD PENETRATION RESISTANCE	JNI
0 -	Approximate ground surface elevation:					GRC WA	Blows per foot 10 20 30 40 50	TESTING
				S-6	. 0			
	Boring terminated at approximately 31 feet							
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	LEGEND					ó	10 20 30 40 50 MOISTURE CONTENT	
	LEGEND						 	
Т	2-inch OD split-spoon sample					Į	Plastic limit Natural Liquid limit	
<u>.</u>	_ ~ men ob spire spoon sample					- (RITTENHOUSE - ZEMAN & ASSOCIATES, INC. Geolechnical & Environmental Consultants 1400 140th Ave NE	







PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. B-34 Elevation reference: N/A Well completed: N/A Page 1 AS-BUILT DESIGN Ground surface elevation: N/A Casing elevation: N/A of 1 OVM READING DEPTH (feet) BLOW SOIL DESCRIPTION TESTING 0 Boring abandoned by backfilling with bentonite. Loose, moist, brown, silty, fine to medium SAND interbedded with gray, S-1 5 17 sandy SILT with trace gravel S-2 69 5 ATD S-3 Medium dense to dense, saturated, gray, silty, fine to medium SAND with S-4 41 80 some wood debris 10 Grades to grayish-black, silty, medium to coarse SAND S-5 12 Bottom of boring at 14 feet. 15 Petroleum-like staining and odor observed in all samples. Field FT-IR analysis of sample S-5 indicated > 10,000 ppm TPH. 20 25 30 **LEGEND** RZA AGRA, Inc. 2-inch O.D. Observed groundwater level Geotechnical & Environmental Group split-spoon sample ATD = at time of drilling 11335 NE 122nd Way, Suite 100 3-inch OD Shelby sampler Kirkland, Washington 98034-6918

Bobcat Boring Logs

BB-1

Gray, moist to wet, silty, gravelly SAND with some cobbles. Slow seepage at approximately 1.0 foot; no other seepage encountered; soil exhibits a petroleum hydrocarbon-like odor. No LPH observed. Met with refusal at approximately 3.0 feet.

BB-2

Gray, moist to wet, gravelly SAND. Slow seepage at approximately 1.5 feet; no other seepage encountered; soil exhibits a petroleum hydrocarbon-like odor. Seepage from 1.5 foot depth pooled at bottom of boring and exhibits an irridescent sheen. No LPH observed. Boring terminated at a depth of approximately 4.0 feet.

BB-3

Gray, moist to wet, gravelly SAND with some gravel. Slow seepage below approximately 2.5 feet; soil exhibits a petroleum hydrocarbon-like odor. Discontinuous blebs of LPH observed on water pooled at the bottom of the boring. Boring terminated at a depth of approximately 4.0 feet. Boring allowed to remain open approximately two hours; discontinuous blebs of LPH still present on the water pooled in the bottom of the boring.

BB-4

Gray, moist to wet, silty, gravelly SAND with some wood debris. Slow seepage at approximately 1.0 foot; soil exhibits a petroleum hydrocarbon-like odor. Moderate seepage observed below approximately 3.5 feet. Approximately 0.01 to 0.02 feet of LPH accumulated on groundwater in the boring. Boring terminated at a depth of approximately 4.0 feet.

BB-5

Dark gray, wet, SAND with some silt, gravel, and wood debris. Moderate seepage observed below approximately 3.0 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet; caved to approximately 3.5 feet. Gauged fluid at bottom of boring using Colorcut paste; it appeared to be 100% LPH. Collected two bottles of LPH for potential future laboratory analysis; collected one bag sample of soil for possible sieve analysis.

BB-6

Gray, moist to wet, gravelly, SAND with some silt. LPH seepage observed at approximately 3.8 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste; it appeared to be 100% LPH.

BB-7

Gray, moist to wet, gravelly, SAND with some silt and wood debris. Slow water and LPH seepage observed at approximately 1.0 feet; rapid LPH seepage observed below approximately 3.5 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste; it appeared to be 100% LPH.

Logged By TJP 5/22/96

Page 1

BB-8

Gray, moist to wet, gravelly SAND with some silt; scattered glass shards. LPH observed on tip of auger at approximately 2.5 feet. Slow seepage observed below approximately 3.8 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste approximately one hour after drilling boring; LPH thickness approximately 0.05 feet.

BB-9

Gray, moist to wet, gravelly SAND with some silt. Slow seepage observed at approximately 1.5 feet. Slow seepage observed again below approximately 3.8 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste; fluid appears to be a mixture of LPH and water (stains tape black like LPH but changes Colorcut from yellow to red like water).

BB-10

Gray, moist to wet, gravelly SAND with some silt and cobbles. No seepage observed; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet.

BB-11

Gray, moist to wet, gravelly SAND with some silt. No seepage observed in boring but soil and auger tip appears to be saturated with water; no LPH observed. Soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Boring left open overnight. Fluid level in boring in 5/23/96 was at approximately 3.0 feet. Gauged fluid with Colorcut paste; LPH thickness measured in boring using this method was approximately four inches. Collected two bottles of LPH for potential future laboratory analysis; collected one bag sample of soil for possible sieve analysis.

BB-12

Gray, wet, gravelly SAND with some silt. Rapid seepage observed below approximately 3.0 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Seepage accumulated in the boring to a depth of approximately 2.0 feet. Gauged fluid at bottom of boring using Colorcut paste; LPH thickness approximately 0.01 feet. Collected two bottles of LPH for potential future laboratory analysis.

BB-13

Gray, moist, gravelly SAND overlying saturated %-inch minus round rock at approximately 2.0 feet. LPH on tip of auger when removed from the boring. However, boring caved as fast as the auger was removed; consequently, LPH thickness was indeterminate; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet.

BB-14

Gray, moist, gravelly SAND with some silt and scattered metal debris. No seepage observed; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet.

Logged By TJP 5/22/96

			LOG	OF		Project No: 05-487-002 Boring No: W-1
		EXE	LORATOR	Y BORING		Date: 2-23-90
						Client: American Distributing Co Driller: Geotech
	ocation of b	ooring:				Location: Bulk Terminal-Everett, Drilling Method: CMEC-55 Hollow Stem Auger
						Logged by: G. Stuesse Hole Diameter: 7"
						Installation Data: (See Below) Page No: 1 of 1
		1	1		T	
th	Graphic	Blow/ft	Vapor Concen-	1	Soil Group Symbol	Water Level Time: Date: Comments:
:)	Log		tration		(U.S.C.S.)	
			(ppm)	1		
_						
-						0-3.0" Asphalt
-						·
				Ring @	Pt	3.0' Organic debris, silty, brown, loose, moist, primarily
- 6		4.00		3.0'		wood shavings, slight organic odo
- [
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- [10.0' Silt, brown, soft, wet, wood shavings, slight odor.
-					ML	
-		1				
		ļ				
		İ				15.0' Silt, brown, soft, wet, wood shavings, slight
- 4					ML.	petroleum sheen on cuttings.
- 1						postosem anden on enterings.
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	TD=23.0'					
						Installation Data:
			-			Screen: 23.0' - 3.0'
	.					Blank: 3.0' - 0
			1			Sand: 23.0' - 2.0'
			1			Bentonite: 2.0' - 1.0'
			ļ			Concrete: 1.0' - 0
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		PV	LOG			Project No: 05-487-002 Boring No: W-2						
		EA	PLORATOR	BORING		Date: 2-22-90 Client: American Distributing Co Driller: Geotech						
7	location of h			_								
	TOCACION OI I	ooring.				Location: Bulk Terminal-Everett, Drilling Method: CMEC-55						
						Hollow Stem Auger						
						Logged by:			Hole Diameter: 7"			
						Installation	n Data: (Se	e Below)	Page No: 1 of 1			
			Vapor	Sample type	Soil Group	Water Level	Time:	Date:	Comments:			
pth	Graphic	Blow/ft	Concen-	and Depth	Symbol							
ft)	Log		tration		(U.S.C.S.)				-			
			(ppm)									
		 										
-			TIP II			0-3" Gravel						
				į	1				cose, very moist, occasional			
-					SW				e oily odor, dark brown, oily			
-		11	60	Ring @		film on	outside of	sampler.				
-				3.0'					•			
- [5.0' Sand,	fine-coarse	e, grey, l	oose, wet, occasional fine			
- [sw				ily, odor, dark brown oily fil			
-							side of sam		-			
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			1						pose, wet, occasional coarse			
Ţ.			1		sw				odor, dark brown oily film			
-					-	on cuts	ide of samp	pler.				
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-					sw	20.0' Sand, f	ine coarse,	grey, lo	cose, wet, occasional coarse			
- lii	liimiimiii	1		-		gravel,	slight-med	iium oily	odor, dark brown oily film			
-	,,,,,,,,,,,,,,,		1	1	OF		ide of samp					
- Ш			1	_	:	23.0' Clay,	brown, soft	, wet, po	ssible organic, very slight			
-	TD=23.0'	1					c odor.	•				
•			ļ									
-]			13			well cou	ld not be sand packed due to			
-						heavin	g sands.		•			
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				į]]	installation I	ata:					
		ļ		1		5	creen:	23.0′ -	3.0'			
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		EXI	LOG O			Project No: 05 Client: Ameri			Boring No: W-3 Date: 2-22-90 Driller: Geotech
<u>.</u>	location of b	ooring:				Location: Bulk			
						Logged by: G. Installation D			Hole Diameter: 7" Page No: 1 of 1
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time:	Date:	Comments:
0 -						0-3" Asphalt			
2 -		11		Ring @	SP			, fine-med	ium, grey, loose, moist,
6 - 8 - -					SP			, fine-med , no odor.	ium, grey, loose, wet,
- .2 - - 4 -									
8 -					SP	15.0' Sand, slig			iium, grey, loose, wet,
2 -				-	SP	20.0' Sand, slig occasional			lium, grey, loose, wet,
4 -	TD=23.0'				1	OTE: Vapors fr	com well	have H2S c	dor.
-					I	Bla San Ben	een: ink: id: itonite:	23.0' - 3 3.0' - 23.0' - 2 2.0' - 1 1.0' -	0' .0'
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	and the statement of the statement		LOG	OF		Project No:	05-497-	-003		Boring No: W-4
		EXI	PLORATOR'	Y BORING		110,000	03-407-	-003.	Date: 2/22/90	
						_ Client: Ame	rican D	Distributin	g Co.	Driller:
í	ocation of h	oring:				Location: Bu	lk Term	ninal		Drilling Method:
						Eve	Hole Diameter: 7"			
						Logged By:				Page No: 1 of 1
						Installation	Data:	See Below		
			Vapor	Sample typ	e Soil Group	Water Level	Time	Date	Commen	
epth	Graphic	Blow/ft	Concen-	and Depth	Symbol					
(ft)	Log		tration		(U.S.C.S.)					
•			(ppm)							
0 -		<u> </u>			-	0 -3" Concret		l		
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2 -										
-			ŀ		SM					
4 -		16	0	Ring @ 4'		@ 4' Sand, si	lty, f	ine to medi	um grain	ned, gray/brown, loose,
-						wet, moderate	odor,	film of br	own oil	on sampler.
6 -										
-										
8 -										
-										
0 -		1				@ 10' Sand, s:	ilty, f	ine to med	ium grai	ned, gray/brown, loose, wet,
2 -		1				moderate odor	, piece	s of glass	, metal	and wood.
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- 4	† 		1			@ 15' Clay, or	ganic.	brown. so:	ft. wet.	pieces of wood, very
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0 -	+ + + + + + 4						ganic,	brown, so	ít, wet,	pieces of wood, very
-	[[4]4]4]4]4]4]					slight odor.				
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			LOG	OF		Project No:	05-487	-003		Boring No: W-5
		EXI	PLORATOR	BORING						Date: 2/22/90
7.						_ Client: Ame			ng Co.	Driller:
)1	location of h	oring:				Location: Bu				Drilling Method:
						1	erett,	WA		Hole Diameter: 7"
						Logged By:				Page No: 1 of 1
						Installation	Data:			
			Vapor	ł	-	Water Level	Time	Date	Commen	ts:
h	Graphic	Blow/ft	Concen-	1 -						
)	Log		tration (ppm)		(U.S.C.S.)					
			(ppm)							
-						0 - 6" Gravel		1	l	
.										
		28	50	Ring @ 3'	-	21 0-1				
			30	Kind 6 2	SP	moist, slight	ne to :	medium gra:	ined, sl:	ightly silty, gray, loose,
						moist, slight	odor,	pieces of	wood and	d metal.
1						@ 6' Sand, fir	ne to m	medium grai	ned, sli	ightly silty, gray, loose,
						wet, slight or	dor, fi	cuttings.		
		ļ	İ							
	:::::::::::	1				•				
		l	ı		1					
				ļ	SP	0 15' Sand, fi	ne to i	medium gra	ined, sl:	ightly silty, gray, loose,
)`	wet, slight od	or, fi	lm of brown	n oil on	cuttings.
		-								
					(20' Sand, fi	ne to m	medium grai	ined, sli	ightly silty, gray, loose,
					•	vet, slight odd	or, Cut	ttings coat	ed with	brown oil film
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				1	1	nstallation Da	ata: S	creen	23' - 3	,,
	.		į						3' - 0	
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	ecation of b		LOG PLORATOR	OF Y BORING		Project No: 05-487-003 Boring No: W-6 Date: 2/23/90 Client: American Distributing Co. Driller: Location: Bulk Terminal Drilling Method: Everett, WA Hole Diameter: 7" Logged By: Page No: 1 of 1 Installation Data: See Below					
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	ts:	
0 - 2 - 4	TD=23'	19	30	Ring @ 3'	OL	@ 6' Sand, sl. wet, slight of water and cut: @ 10' Sand, ve slight odor, s water and cuts	ightly dor, so tings. ery sil some gr tings.	silty, find the gravel, ty, fine the gravel, piece dark brown	e to med pieces o medium es of wo	0 2' 1'	

- 1	location of b		LOG (Project No: Client: Am Location: B E Logged By: (Installation	erican D ulk Term verett, G. Stues	Distributin Minal WA Se	Boring No: W-7 Date: 2/21/90 Driller: Geotech Drilling Method: CMEC-55 Hollow-Stem Auger Hole Diameter: 7" Page No: 1 of 1		
th	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	nts:	
	TD=16'	5	TIP# 400	Ring @ 3'	SM	@ 3' Sand, s wet, gravel,	ilty, fi	oily odor.	se grai	ned, gray to da	rk gray, loose

			LOG (Project No:						
	ocation of b		PLORATOR	E BORING		Date: 6/28/90 Client: American Distributing Co. Driller: ESE Location: Bulk Terminal Drilling Method: Hand Auge Everett, WA Hole Diameter: 4" Logged By: G. Stuesse Page No: 1 of 1 Installation Data: See Below						
-			Vapor		Soil Group	Water Level	Time	Date	Commen	· · · · · · · · · · · · · · · · · · ·	-	
n)	Graphic Log	Blow/ft	Concen- tration	1	Symbol (U.S.C.S.)			<u> </u>				
			(ppm)		(
_					SM	0 - 3' Sand,	silty,	brown, loc	se, mois	t to wet, no odor	•	
-					ML	@ 3' - 10' s:	iic, gr	ay, soft, w	et, slig	ht odor.		
	TD=10'					Installation		Screen Blank	10' -			
								Sand	2' - 6	· ·		
								Bentonite Concrete				
								0001 6.0	., .	•		
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LOG OF EXPLORATORY BORING location of boring:						Project No: 05-487-003 Boring No: W-9 Date: 5/28/90 Client: American Distributing Co. Driller: Location: Bulk Terminal Drilling Method: Han Everett, WA Hole Diameter: 7" Logged By: Page No: 1 of 1					
Depth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	1	Installation Water Level	Data:	Date	Commen		
0 2 4 6					ML	0 - 3' Silt, 0 3' - 7.5' S					
8 -	TD=7.5'					Installation i		Screen Blank Sand Bentonite Concrete	1.5' - 7.5' - 1.0' -	0 1.0' 0.5'	
-											
-											
-											
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	,	EXE	LOG		***************************************	Project No: 0			-,	Boring No: W-10 Date: 6/28/90		
	location of h	boring:				Client: Amer Location: Bul Eve Logged By: Installation	k Term rett,	inal WA	g Co.	Co. Driller: Drilling Method: Hand Auger Hole Diameter: 7" Page No: 1 of 1		
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	ts:		
0 2 4					ML Pt	0 - 2' Silt, b @ 2' - 6' Peat	rown,	moist, pie	oces of v	wood and metal, no odor.		
-	TD=6'					Installation D	;	Screen Blank Sand Bentonite	6.0' - 2.0' - 6.0' - 1.5' -	0 1.5'		
-												
-						·						
-												
-												
-												

LOG OF Project No: 05-487-003 Boring No: W-11 EXPLORATORY BORING Date: 6/28/90 Client: American Distributing Co. Driller: ocation of boring: Location: Bulk Terminal Drilling Method: Hand Auger Everett, WA Hole Diameter: 7" Logged By: Page No: 1 of 1 Installation Data: See Below Sample type Soil Group Water Level Vapor Date Comments: Graphic 2pth Blow/ft Concenand Depth Symbol 'ft) Log tration (U.S.C.S.) (ppm) 0 - 2' Peat, silty, brown, moist, no odor. Pt @ 2' - 6.5' Peat, brown, wet, brown, oil sheen. TD=6.5' Installation Data: Screen 6.5' - 1.5' Blank 1.5' - 0 6.5' - 1.0' Bentonite 1.0' - 0.5' Concrete 0.5' - 0

			LOG	OF		Project No:	: 05-487	7-003		Boring No: W-12	
		EXI	PLORATOR	RY BORING		Date: 6/28/90					
						_ Client: An	merican	Distribution	na Co.	Driller:	
-< \	location of b	oring:				Location: E	Bulk Ter	minal		Drilling Method: Hand Auger	
						Everett, WA Hole Diameter: 7					
						Logged By:				Page No: 1 of 1	
						Installatio	n Data:	See Below			
	·										
			Vapor	Sample ty	pe Soil Grou	p Water Level	Time	Date	Commen	Ťa.	
epth	Graphic	Blow/ft	Concen-	- and Dept							
(ft)	Log	ł	tration	n	(U.S.C.S.)	-		·		
			(ppm)								
							l				
0 -							-1	- !	l		
-					SM	0 - 3' Sand	ail+	hen		- 4	
2 -						3 501.0	, silly,	Drown, mo	ist, no	odor.	
-							Dase -				
4 -					Pt	1	reat, s	ilità, plom	n, wet, s	slight odor.	
-					1						
6 -				1						•	
_					1						
8 -	TD=7.5'	1				Tage 13 ::		_			
_						Installation	Data:		7.5′ -		
_	ĺ	j						Blank	1.5' -		
_								Sand	7.5′ -		
								Bentonite			
	ļ	1						Concrete	0.5′-	0	
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		EX	LOG (PLORATOR			Project No: 05-487-003				Boring No: W-13 Date: 6/28/90		
iel	d location of b	ooring:				Logged By:	lk Term erett,	minal WA	Driller: Drilling Method: Hand Auger Hole Diameter: 7" Page No: 1 of 1			
				,		Installation		See Below				
epti		Blow/ft	Vapor Concen- tration (ppm)	and Depth) Water Level	Time	Date	Commen	ts:		
0 - 2 - 4 - 6 -					ML	cobbles, no c	0 - 4' Silt, some sand and gravel, brown, moist, occasional cobbles, no odor. 4' - 7' Silt, some sand and gravel, brown, moist, occasional cobbles, no odor.					
- 8 - - - - -	TD=7'					Installation	,	Screen Blank Sand Bentonite Concrete		0 1, 5,		
		·						,				
-												

		EX	LOG (Project No:			77. Co	Boring No: 1 Date: 6/28/	
	ocation of h	ooring:				Location: Bu	lk Term erett,	uinal WA	ig Co.		
pth [t]	Graphic Log	Blow/ft	Vapor Concen- tration	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	ts:	
-			(ppm)		ML	0 - 6.5' Silt	, sandy	y, moist to	D Wet, ve	ery slight od	or.
	TD=6.5'	-				Installation		Screen Blank Sand Bentonite Concrete	6.5' - 2.0' - 6.5' - 1.0' - 0.5' -	0 1.0' 0.5'	
	·										

		EXI	LOG PLORATOR	OF Y BORING		Project No:	05-487	-003		Boring No		
₹ र	location of	boring:				Client: Ame Location: Bu Ev Logged By: Installation	lk Tern erett,	minal WA	g Co.	Driller:	Method: Hand	Auger
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth		Water Level	Time	Date	Commen	ts:		
0 - - 2 - - 4 - - 6 -					MI	0 - 7' Silt,	some s	and and con	bbles, mo	dist to wet	, slight odo	r.
8 -	TD=7'					Installation (Screen Blank Sand Bentonite Concrete	6.0' - 1.5' - 6.0' - : 1.0' - (0 1.0' 0.5'		
									·			
-												
-											P	
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		7 22	LOG			Project No:	05-487	-003		Boring No: W-16
		EX	PLORATOR	Y BORING						Date: 6/28/90
<u> </u>	ocation of b					_ Client: Ame	rican I	Distributir	ng Co.	Driller:
•	ocation of i	of flig.				Location: Bu				Drilling Method: Band Auger
						1	erett,	WA		Hole Diameter: 7"
						Logged By:				Page No: 1 of 1
						Installation	Data:	See Below		
			Vapor	Sample typ	e Soil Group	Water Level	Time	Date	Commen	
≥pth	Graphic	Blow/ft	Concen-					Date	Contine	
ft)	Log	1	tration		(U.S.C.S.)				-	
			(ppm)							
			.l							
0 -								•	1	
-				1	ML	0 - 6' Silt,	some sa	and and gra	avel, mo:	ist to wet, occasional
2 -			1			cobbles, oil	on gro	und water	surface.	
-										
4 -			1		1					
-				1	1					
6 -					<u> </u>					
-	TD=6'					Installation			6' - 2	2'
-	1							Blank	2' - 0	
	1	- 1						Sand	6' - 1	
_		1						Bentonite		
-		1						Concrete	.5' - 0	•
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LOG OF Project No: 05-487-003 Boring No: W-17 EXPLORATORY BORING Date: 6/28/90 Client: American Distributing Co. Driller: location of boring: Location: Bulk Terminal Drilling Method: Hand Auger Everett, WA Hole Diameter: 7" Logged By: Page No: 1 of 1 Installation Data: See Below Vapor Sample type Soil Group Water Level Date Comments: Symbol Blow/ft Concenand Depth Jepth Graphic (ft) Log tration (U.S.C.S.) (ppm) 0 - 6' Silt, some sand and gravel, moist to wet, occasional ML cobbles, oil on ground water surface. Installation Data: Screen 6' - 2' 2' - 0 Blank Sand 6' - 1' Bentonite 1' - .5' Concrete .5' - 0

Mobil Oll/ADC Bulk W.O. 11-04558-09 WELL NO. GP-1 PROJECT: Plant Properties Elevation reference: Unknown Well completed: 19 March 1996 Page 1 AS-BUILT DESIGN Ground surface elevation: Unknown of 1 Casing elevation: Unknown SAMPLE NUMBER BLOW COUNTS SAMPLE TYPE OVM READING DEPTH (cet) Flush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Gravel Surfacing over moist, brown, sitty, Top of casing gravelly SAND, non-odorous **Asphalt** Weathered, red clay brick **Bentonite** GP-1/ Moist, brown, silty, fine SAND with some 0.0 3.0 Castna gravel and minor brick fragments (Schedule-80 1-Inch I.D. PVC) 5 Moist to wet, gray, fine to medium SAND. 10-20 sand petroleum odor at 7.0 feet filter pack GP-1/ 27.0 8.0 Grades to wet, gray, fine to coarse SAND Screen (3-Inch fine sandy sitt layer at 10.0 feet) (1-inch I.D. PVC GP-1/ 10 7.0 WIPH-D with 10.0 0.028-Inch slots) Slip end cap Bottom of boring at 12 feet. 15 20 25 **LEGEND**

Z-inch O.D. Geoprobe sample Observed groundwater level

AGRA
Earth & Environmental

11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918

Cheerved groundwater level
AID = at time of drilling

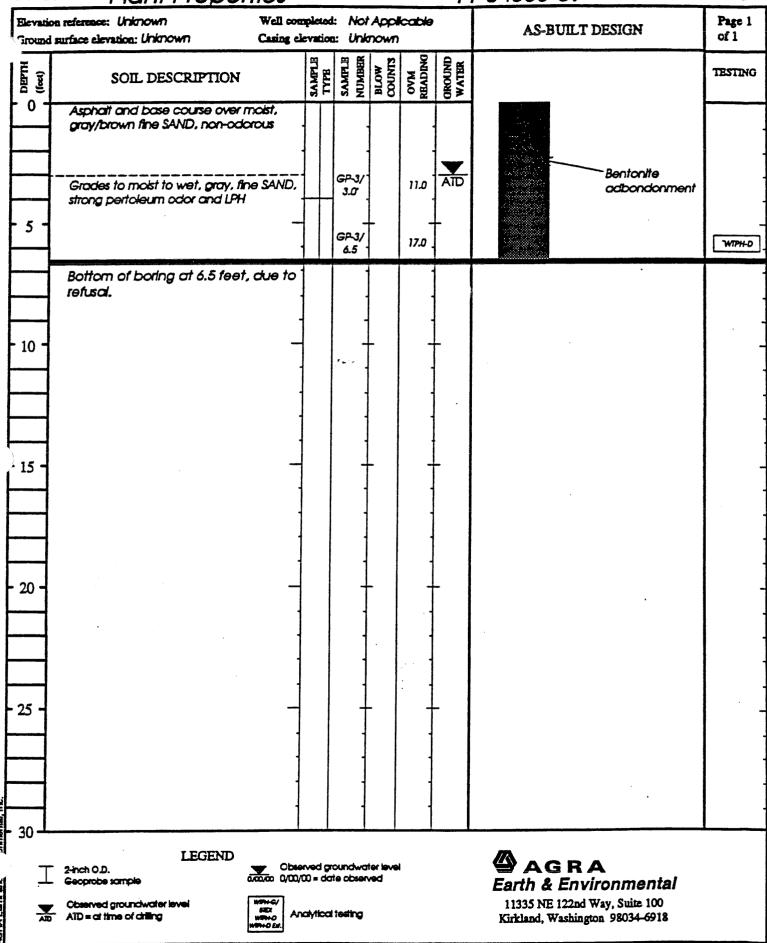
Analytical testing

W.O. 11-04558-09 WELL NO. GP-2 Plant Properties PROJECT: Page 1 Well completed: 19 March 1996 Elevation reference: Unknown AS-BUILT DESIGN of 1 round surface elevation: Unknown Caring elevation: Unknown OVM READING Flush-mounted DEPTH (feet) TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt and base course over moist. Top of casing gray/brown, sitty, gravelly SAND Asphalt Moist, gray, fine to coarse SAND with **Bentonite** some sitt, non-odorous GP-2/ 0.0 3.5 Cadna Grades to gray/brown, sity, fine to (Schedule-80 medium SAND, non-odorous 1-inch I.D. PVC) 5 10-20 sand filter pack 11.0 2-inch fine sandy SILT layer at 7.3 feet GP-2/ 8.0 Grades to saturated, stained black, fine Screen to medium SAND, strong petroleum (1-inch I.D. PVC odor and LPH globules with 10 0.028-inch slots) GP-2/ Fine SAND interbedded with fine wood 11.0 WTPH-D 11.0 Slip end cap fragments Bottom of boring at 12 feet. 15 20 25 **LEGEND GAGRA** Observed groundwater level 2-inch O.D. acción 0/00/00 = date observed Earth & Environmental Geoprobe sample 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing Kirkland, Washington 98034-6918

ATD = at time of atting

PROJECT: Plant Properties

W.O. 11-04558-09 WELL NO. GP-3



W.O. 11-04558-09 WELL NO. GP-4 Plant Properties PROJECT: Well completed: 19 March 1996 Page 1 Elevation reference: Unknown AS-BUILT DESIGN of 1 Casing elevation: Unknown Fround surface elevation: Unknown OVM RBADING BLOW Rush-mounted DEPTH (feet) TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt over base course over Top of casing gray/brown, gravelly, silty SAND, non-odorous Cement Aschalt Moist, brown/black/gray, silty, fine to GP-4/ Cadna 0.0 medium SAND with some gravel, wood 4.0 (Schedule-80 and brick fragments, non-odorous 1-Inch I.D. PVC) 5 Moist to wet, gray/brown, fine SAND, GP-4/ WIPH-D moderate petroleum odor 7.0 6.0 10-20 sand filter pack Wood debris and LPH GP-4/ 11.0 Screen 8.0 (1-Inch I.D. PVC with 10 Fine grained wood fragments, slight 0.028-inch slots) petroleum staining and odor Silp end cap Bottom of boring at 12 feet. 15 20 25 30 **LEGEND** AGRA Observed groundwater level 2-inch O.D. Earth & Environmental 0,00,00 = date observed Geoprobe sample

Observed groundwater level

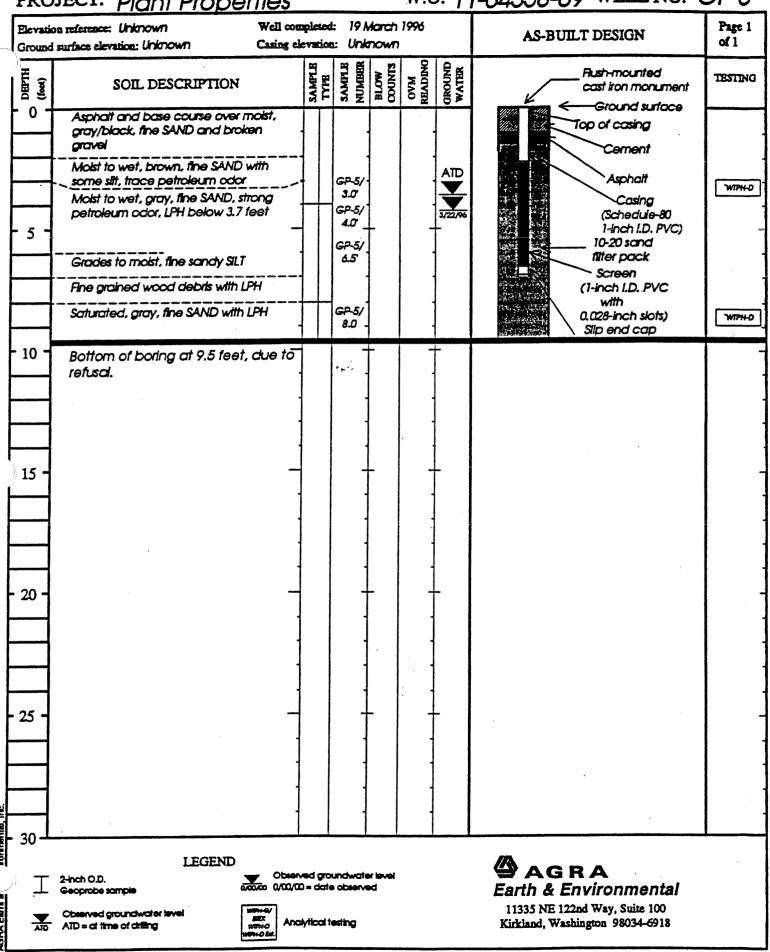
ATD = at time of drilling

Analytical testing

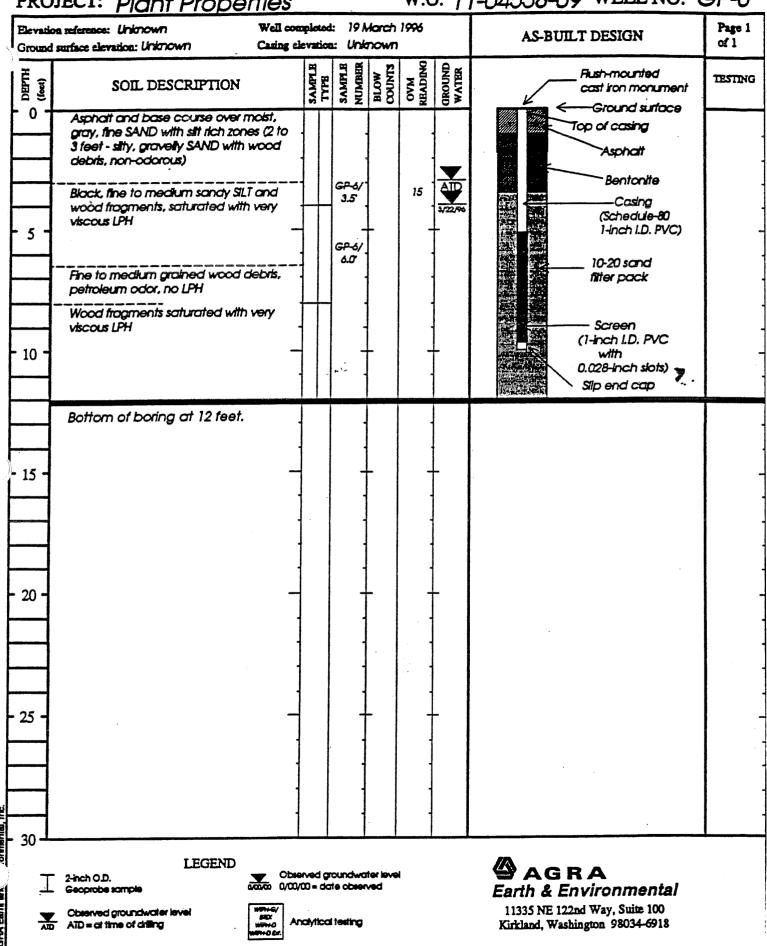
11335 NE 122nd Way, Suite 100

Kirkland, Washington 98034-6918

PROJECT: Plant Properties W.O. 11-04558-09 WELL NO. GP-5



PROJECT: Plant Properties W.O. 11-04558-09 WELL NO. GP-6



Mobil Oll/ADC Bulk W.O. 11-04558-09 WELL NO. GP-7 PROJECT: Plant Properties Well completed: Not Applicable Page 1 Elevation reference: Unknown AS-BUILT DESIGN of 1 Ground surface elevation: Unknown Casing elevation: Unknown SAMPLE TYPE SAMPLE NUMBER OVM READING BLOW OROUND WATER DEPTH (feet) TESTING SOIL DESCRIPTION 0 Asphalt and base course over moist, brown, fine SAND with some sit (5-inch sandy SILT layer at 3.0 feet). non-odorous Bentonite GP-7/ adbondonment AID 40 Moist, brown, sitty, gravelly SAND with wood debris and very viscous LPH WTPH-G/ GP-7/ 5 grading to fine grained wood debris ETFY 5.5 WIPH-D Ed. Bottom of boring at 7.0 feet, due to refusal. 10 15 20 25 LEGEND AGRA Observed groundwater level 2-inch O.D. Devreedo etce consorved

Drilling started: 20 March 1996

Observed groundwater isvel

ATD = at time of drilling

Geoprobe sample

Drilling completed: 20 March 1996

Analytical testing

Logged by: CCC

Earth & Environmental

11335 NE 122nd Way, Suite 100

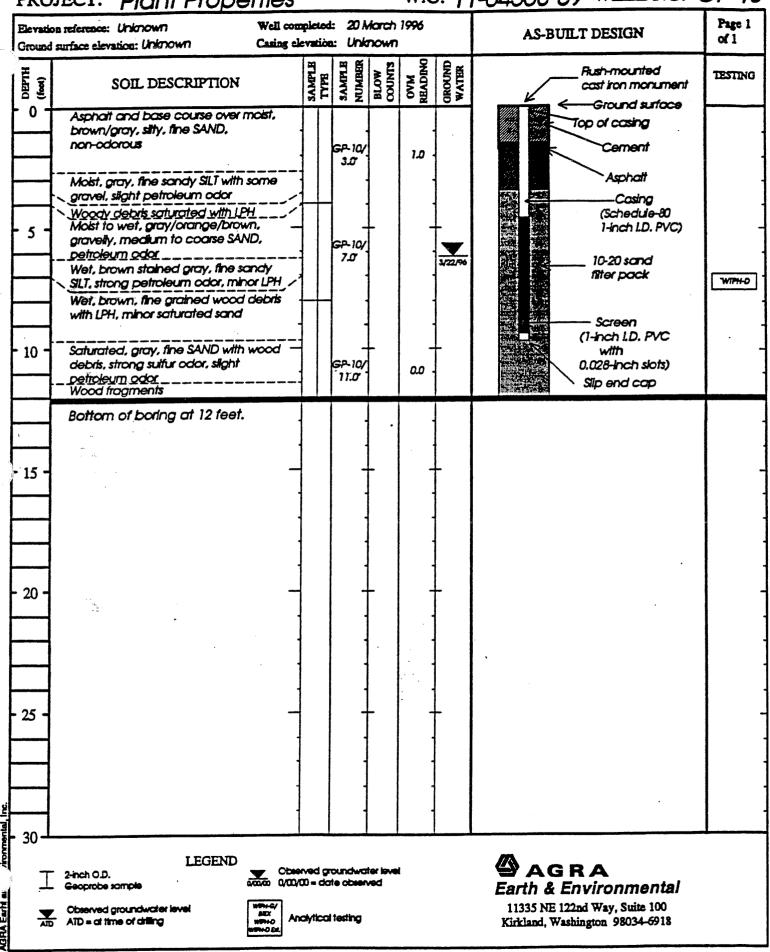
Kirkland, Washington 98034-6918

PROJECT:

W.O. 11-04558-09 WELL NO. GP-8 Plant Properties Well completed: 20 March 1996 Page 1 Elevation reference: Unknown AS-BUILT DESIGN Ground surface elevation: Unknown Casing elevation: Unknown of 1 OVM READING BLOW DEPTH (feet) Flush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt and base course Top of casing GP-8/ **Asphalt** 3.0 **Bentonite** Minor recovery, moist, dark gray SAND. slight petroleum odor 3/22/96 Cadna Molst, black to gray/green, fine sandy (Schedule-80) SILT with wood debris, 1" thick zone of 1-Inch I.D. PVC) 5 LPH 10-20 sand GP-8/ filter pack 11 Fine grained wood debris saturated with 9.0 Screen LPH over gray/green SILT WIPH-G/ (1-inch I.D. PVC ETEX with WIPH-D Bd Mionr recovery - sitty, fine SAND over 0.028-inch slots) fine grained wood debris, petroleum odor 10 Stip end cap Bottom of boring at 11 feet. 15 20 25 LEGEND AGRA Observed groundwater level 1-inch O.D. 0/00/00 = date observed Earth & Environmental Geoprobe sample 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing ATD = at time of drilling Kirkland, Washington 98034-6918

W.O. 11-04558-09 WELL NO. GP-9 Plant Properties PROJECT: Well completed: 20 March 1996 Elevation reference: Unknown Page 1 AS-BUILT DESIGN Caring elevation: Unknown of 1 Ground surface elevation: UnithOWN BLOW OVM DEPTH (feet) Flush-mounted TESTING SOIL DESCRIPTION cost iron monument 0 Ground surface Asphalt and base course Top of casing **Asphalt Bentonite** Trace recovery; minor gravel and wood fraaments Casina (Schedule-80 5 1-inch L.D. PVC) 3/22/96 Minor recovery; moist, gray, fine SAND 10-20 sand over minor wood debris and sandy SILT filter pack with gravel, strong petroleum odor WIPH-G/ MEY GP-9/ 3.0 VIPH-D Bd 8.0 Screen WIPHD (1-Inch I.D. PVC 10 0.028-inch slots) Silp end cap No recovery Bottom of boring at 12 feet. 15 20 25 **LEGEND** 🖴 AGRA Observed groundwater level 2-inch O.D. acción 0/00/00 = date observed Earth & Environmental Geoprobe sample 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing Kirkland, Washington 98034-6918 ATD = at time of drilling

PROJECT: Plant Properties W.O. 11-04558-09 WELL NO. GP-10



W.O. 11-04558-09 WELL NO. GP-11 PROJECT: Plant Properties Elevation reference: Unknown Well completed: 20 March 1996 Page 1 AS-BUILT DESIGN of 1 Ground surface elevation: UNICOWN Casing elevation: Unknown SAMPLE NUMBER OVM READING BLOW GROUND WATER DEPTH (feet) Rush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface n Asphalt and base course over moist, Top of casing brown, sitty, fine SAND, non-odorous GP-11/ **Asphalt a**o 3.0 **Bentonite** Moist, gray, sitty, fine SAND with mottling and some shells and wood debris -Casing Moist, tan grading to gray, fine sandy (Schedule-80 SILT with interbedded wood debris, slight 5 1-inch I.D. PVC) petroleum odor at 4.0 feet 45 Wet to saturated, brown, sitty, gravelly 10-20 sand WIPH D SAND, strong petroleum odor, minor LPH filter pack WIPH-G/ MEX Saturated, black, fine SAND, trace WTPH-D WIPH-D Bd. petroleum odor 0.0 8.0 Screen (1-Inch I.D. PVC 10 with 0.028-inch slots) SP-11/ Sip end cap 12.0 Bottom of boring at 12 feet. 15 20 25 **LEGEND 4**AGRA Observed groundwater level 2-inch O.D. CONTROL O/00/00 = date observed Geoprobe sample Earth & Environmental 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing ATD = at time of drilling Kirkland, Washington 98034-6918

W.O. 11-04558-09 WELLNO. GP-12 PROJECT: Plant Properties Elevation reference: Unknown Well completed: 20 March 1996 Page 1 AS-BUILT DESIGN of 1 Casing elevation: Unknown Ground surface elevation: Unknown SAMPLE OVM RBADING BLOW DEPTH (feet) Rush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt and base course over moist, Top of cosing black, gravelly SAND, slight petroleum odar Cement Moist, gray/brown, fine to coarse SAND grading to brown, fine SAND with some **Aschalt** gravel, non-odorous Casina (Schedule-80 1-inch LD. PVC) 5 10-20 sand SP-12/ 8.0 filter pack Screen (1-Inch I.D. PVC with 0.028-inch stots) :D.12/ Wet, gray stained globules black, fine 10.0 10 SAND with gravel, strong petroleum GP-12/. odor and minor LPH globules WITHO 11.0 Stip end cap GP-12/ Saturated, gray, fine SAND with some 3.2 WIPHO 12.5 gravel, strong petroleum odor, minor alobules of LPH 15 Bottom of boring at 14 feet. 20 25 LEGEND △ AGRA Observed groundwater level 2-inch O.D. 0/00/00 = date observed Earth & Environmental Geoprobe somple 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing Kirkland, Washington 98034-6918 ATD = at time of drilling

PROJECT: Plant Properties W.O. 11-04558-09 WELL NO. GP-13 Elevation reference: Unknown Well completed: 20 March 1996 Page 1 AS-BUILT DESIGN Ground surface elevation: Unknown Casing elevation: Unknown of 1 SAMPLE BLOW OVM 3 SOIL DESCRIPTION TESTING 0 Asphalt over dense, moist, gray, gravely, fine to coarse SAND. non-odorous 3P-13/ 3.5 Bentonite adbandonment 5 Grades to moist, gray/black, gravelly, fine to medium SAND, non-odorous WIPH-D 7.0 WIPH-G/ VIPH-D Ed SP-13/ 10 ATD WIPH-D Wet/saturated, gray/black, sitty, fine 10.0 SAND with some gravel and some wood debris, organic odor Bottom of boring at 12 feet. 15 20 25 30 LEGEND **⇔**AGRA 2-inch O.D. Observed groundwater level ovava o/00/00 = date observed Geoprobe sample Earth & Environmental Observed groundwater leval 11335 NE 122nd Way, Suite 100

ATD = of time of drilling

Analytical testing

Kirkland, Washington 98034-6918

RITTENHOUSE-ZEMAN & ASS Geotechnical / Hydrogeological C	OC., onsul	INC. Itants				NAME			_	Ever			558-1 'lant		-
SOIL DESCRIPTION	DEPTH (FEET)	LAB TESTS	SAMPLING	GROUND WATER	8	STAN		▲ BI	LOWS	RATI S PER er, 30	F00	Γ		CE	
Ground Surface Elevation Approximately Feet	<u> </u>	, ב	ŝ	৳ >	0		10		20		30		40	5	0
Loose, wet to saturated, brown-gray, silty fine SAND and fine sandy SILT with a trace of gravel (Fill)	-		I	▽		A									
Very loose to loose, saturated, gray, silty fine to medium SAND with a trace of grayel (Fill)	-5 -		T							-					
Soft, saturated, brown, silty PEAT	-10									-	-				
Total depth 11½ feet Boring completed 9 March 1988										-					
	-15														
	-20			-											
	- - -														
	-25								-	-	*******			• •	
	-30 -								·			*************			
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SAMPLING GR	OUND	WAT	ER ⊄	SEAL				LAI	BOR	ATOF	RY T	EST	3		
工 2° OD SPLIT SPOON SAMPLE 工 3° OD SHELBY SAMPLE			4							TER C			_		
3 Et ID DING ON ELE	/ATED	LEVEL	<u> </u>	DATE						I PLAS					
ULK SAMPLE AT TIME	E OF DE	RILLING	品	OBSER	VATIC	N		,	-•		— LI		LIMIT		•
* SAMPLE NOT RECOVERED			L		L TIP		Z	PLAST	FIC LII	CC	ATURA ONTEI	L WA	TER		

RITTENHOUSE-ZEMAN & ASS	30C.,	INC.		BOF	ING N	NUMBE	R _M	I-8			W.O.	. <u>W-6</u>	4558- <u>1</u>	
Geotechnical / Hydrogeological (Consul	ltants		PRO	JECT	NAME		bil ()il -	Ever	ett E	Bulk F	'lant	
SOIL DESCRIPTION Ground Surface Elevation Approximately Fee		LAB TESTS	SAMPLING	GROUND	0			▲ Bi D lb. h	LOW	8 PER er, 30	F00	T drop)	STAN) 40	CE
Loose to medium dense, wet to saturated, gray and	0 1					T	1			1	1	_	+0	_
brown-gray, silty fine SAND and fine sandy SILT with a trace of gravel (Fill)	-		T	又			A							
Very loose to loose, saturated, gray, silty fine SAND with a trace of gravel (Fill)	-5		T											
Soft, saturated, brown, silty PEAT	-10													
otal depth 11½ feet Oring completed 9 March 1988	+										**************************************	With the same of t		
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	-30													
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3° OD SHELBY SAMPLE 2.5° ID RING SAMPLE	AOUND	LEVEL	∇	SEAL DATE OBSER		ON		• 9	6 WA	TER (CONT		S	
SAMPLE NOT RECOVERED	IC OF DI	HILLING			L TIP		Ź	/ PLAST	ric Li	N.		AL WA		

Geotechnical / Hydrogeolog			Т	PRO	JECT	NAM	E _M	obil	0il -	Eve	rett (Bulk	Plant	
SOIL DESCRIPTION	DEPTH (FEET)	LAB TESTS	SAMPLING	GROUND WATER	5	AATE		A E	SLOW	S PEF	ION I	T		ICE
Ground Surface Elevation Approximately	1 001	Š	SA	GR WA	0		10		20		30		40	5
Loose, wet to saturated, dark brown, grave silty, fine SAND with a trace to some wood (Fill)	elly, d debris		I	又		A								
/ery loose, saturated, wood debris			—			ļ	ļ							
ery loose to loose, saturated, dark brown nd gray, silty, fine SAND (Fill)	n-gray		<u>+</u>		A									
oft, saturated, brown, silty PEAT	10													
otal depth 11½ feet oring completed 9 March 1988														
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MPLING 2° OD SPLIT SPOON SAMPLE 3° OD SHELBY SAMPLE 2.5° ID RING SAMPLE	GROUNE WATER		1	SEAL DATE				•		TER C	RY T		S	لحجيد

RITTENHOUSE-ZEMAN Geotechnical / Hydrogeolog	gical Con	sult	ants	1		JECT					Ever	w.o. ett B		558-1 lant	
SOIL DESCRIPTION		ОЕРТН (FEET)	LAB TESTS	SAMPLING	GROUND WATER	s	STAN		▲ BI	LOWS	PER	ON F	Γ		CE
Ground Surface Elevation Approximately	Feet		- K	SAI	₩ Š ×	0		10		20		30		40	
coose to medium dense, wet to saturated, or prown, gravelly, silty, fine to coarse SAN a trace to some wood debris (Fill)	lark ID with	-0 = - -		Ι	<u> </u>										
ery loose, saturated, dark brown and gray ine SAND (Fill)	, silty	-5		Ι											
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oft, saturated, brown, silty PEAT		10													
ring completed 9 March 1988	}	15													
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MPLING 2° OD SPLIT SPOON SAMPLE 3° OD SHELBY SAMPLE	GROL	JND	WAT	ER d	SEAL					BOR.		RY T		S	

PLASTIC LIMIT

SOIL DESCRIPTION SOIL DESCRIPTION SOIL DESCRIPTION STANDARD PENETRATION RI BLOWS PER FOOT	ZEMAN & ASSOC., INC. BORING NUMBER MW-11 W.O. W-4558-1 drogeological Consultants PROJECT NAME Mobil 0il - Everett Bulk Plant
Very loose, wet to saturated, gray and brown-gray, silty, fine SAND with a trace of gravel and wood debris (Fill) Loose to medium dense, saturated, gray, silty fine SAND with some fine sandy SILT and a trace of gravel (Fill) Soft, saturated, brown, silty PEAT Total depth 11s feet Boring completed 9 March 1988 -15 -20 -25	ON STANDARD PENETRATION RESISTANCE A BLOWS PER FOOT (140 lb. hammer, 30 inch drop)
debris (Fill) Lose to medium dense, saturated, gray, silty fine -5 SAND with some fine sandy SILT and a trace of gravel (Fill) Soft, saturated, brown, silty PEAT Total depth 11½ feet Boring completed 9 March 1988 -15 -20 -25	-0 10 20 30 40 50
SARU With Some fine sandy SILT and a trace of gravel (Fill) Soft, saturated, brown, silty PEAT Total depth 11½ feet Boring completed 9 March 1988 -15 -20 -25	grayel and wood
Soft, saturated, brown, silty PEAT Total depth 11½ feet Boring completed 9 March 1988 -15 -20 -30	, gray, stity fine of the nd a trace of the nd a
Total depth 11½ feet Boring completed 9 March 1988 -15 -20 -25 -30	
-20	
-25	-15
-25 -25 -30 	
	-20
-30	-25
40	40
SAMPLING I 2' OD SPLIT SPOON SAMPLE II 3' OD SHELBY SAMPLE SEAL LABORATORY TE WATER CONTE NP NON PLASTIC LK SAMPLE AT TIME OF DRILLING ATD OBSERVATION	GROUND WATER SEAL DATE WATER LEVEL AT TIME OF DRILLING ATD OBSERVATION LABORATORY TESTS WATER CONTENT NP NON PLASTIC LIQUID LIMIT

WELL TIP

* SAMPLE NOT RECOVERED

-NATURAL WATER

CONTENT

∠ PLASTIC LIMIT

RITTENHOUSE-ZEMAN & Geotechnical / Hydrogeologic	ASSUC cal Cons	, IN ultai	IC. nts					R Mw	-13 bil 0)i] -	Ever			558-1	
SOIL DESCRIPTION Ground Surface Elevation Approximately	, , , ,	DEPTH (FEET)		SAMPLING	GROUND WATER		STAN	DAR	D PE	NET	RATI PER er, 30	ON F	RESIS T drop)	STAN	CE
Loose, wet to saturated, brown-gray, silty f	fina	o —				T	ī	Ī	Ī			-	-	+0	1
SAND with a trace to some gravel and wood de (Fill)	ebris			I	又										
Loose, saturated, gray, silty SAND with some gravel (Fill)		5				_									
	Ī			В											
Soft, saturated, brown, silty PEAT	— — ⁻¹	0													
oring completed 9 March 1988	-1:	5											ļ		
	-	J			_						-				
) h	-21	0													
	ŀ									····					
	-25	5													
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	-30	ס										* ************************************			
	ŀ														
	-35 -	5													
	40									٠.					
AMPLING		ID W	A TE	,							·				
2° OD SPLIT SPOON SAMPLE 3° OD SHELBY SAMPLE 2.5° ID RING SAMPLE BULK SAMPLE SAMPLE NOT RECOVERED	GROUN WATE AT TIME OF	R LEV	ÆL '	∇	SEAL DATE OBSERY WEL		N	1	• %	WA.	ATOF TER C I PLAS	ONTI	ENT	LIMIT	

LIQUID LIMIT
NATURAL WATER
CONTENT

∠ PLASTIC LIMIT

WELL TIP

* SAMPLE NOT RECOVERED

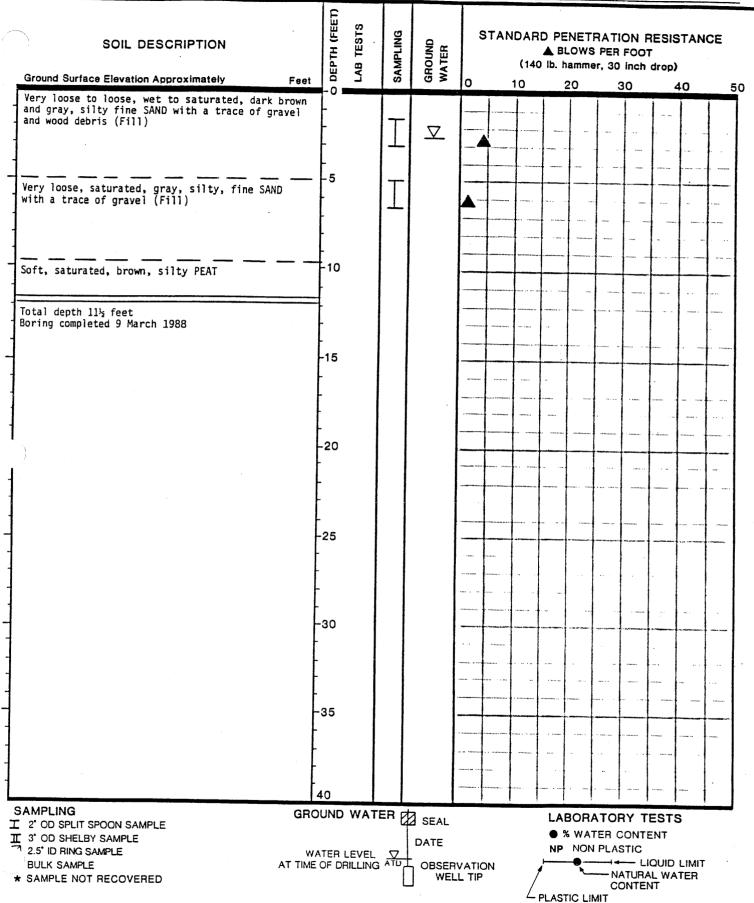
NATURAL WATER

- PLASTIC LIMIT

BORING NUMBER MW-15

W.O. <u>W-4558-1</u>

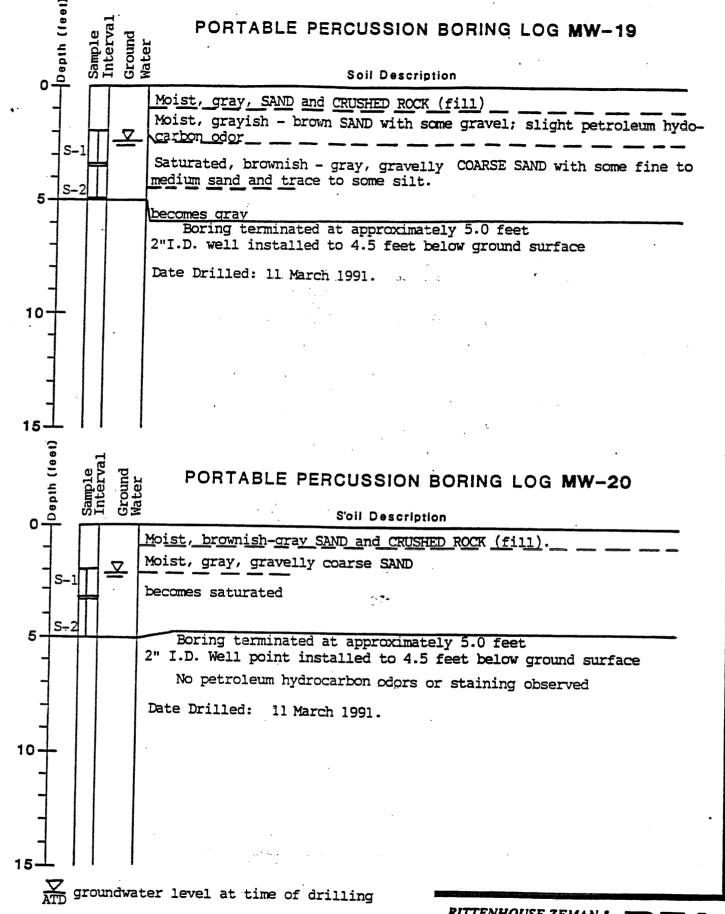
PROJECT NAME _Mobil Oil - Everett Bulk Plant



RITTENHOUSE-ZEMAN & Geotechnical / Hydrogeolog	ical Consu	iltants				NAME				- Eve			4558- Plant	
SOIL DESCRIPTION	DEPTH (FEET)	3 TESTS	SAMPLING	GROUND	5	STAN		▲ B	LOW:	S PEF	F00	RESIS	STAN	ICE
Ground Surface Elevation Approximately	Feet 0	LAB	SAI	G.W.	0		10		20		30		, 40	5
Loose to medium dense, wet to saturated, by gray, gravelly, silty SAND with a trace to wood debris (Fill)	rown- some			∇										
	-5		_	·									-	
	<i>t</i>					ļ	A	ļ. 						
Soft, saturated, brown, silty PEAT)										-		
Total depth 11½ feet Boring completed 9 March 1988												-		
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	-25					.,		,						
	-													
	-30													
	-35										-			
	-													
SAMPLING	40													
SAMPLING L 2' OD SPLIT SPOON SAMPLE T 3' OD SHELBY SAMPLE 7 2.5' ID RING SAMPLE	GROUNI	LEVEL		SEAL DATE		-		• 9	% WA	ATO TER (CONT	ESTS	S	

Geotechnical / Hydrogeolog	zicai con	_	iunis	T	PHO	JECT	NAM	E	0011	ווט	- Eve	rett	Bulk	Plant	
SOIL DESCRIPTION		DEPTH (FEET)	LAB TESTS	SAMPLING	GROUND WATER	5	1AT6			BLOW	TRAT 'S PEI ner, 3	R FOO	T	STAN	1CE
Ground Surface Elevation Approximately	Feet	. OE	_5	SA		0		10		20	, •	30		4 0	
Loose to medium dense, wet to saturated, I gray to gray, silty, fine to medium SAND v trace of gravel (Fill) Very loose, saturated, gray, silty, fine to SAND with trace of gravel, wood debris and organics (Fill)	with a	5		I I	∇										
		10													
oft, saturated, brown, silty PEAT otal depth 11½ feet oring completed 10 March 1988		10													
	-1 -	15													
	-2 -2	20													
	- -2 -	5		,											
	-3	0											And the stand of t		
	-3	5													
MPLING	40														•
AMPLING 2° OD SPLIT SPOON SAMPLE 3° OD SHELBY SAMPLE 2.5° ID RING SAMPLE JULK SAMPLE SAMPLE NOT RECOVERED	GROUI WATE AT TIME OF	ER L	EVEL	∇	SEAL DATE OBSERV WELL		N	,	•	% W A	N	CONT STIC	ENT IQUID AL WA	LIMIT	

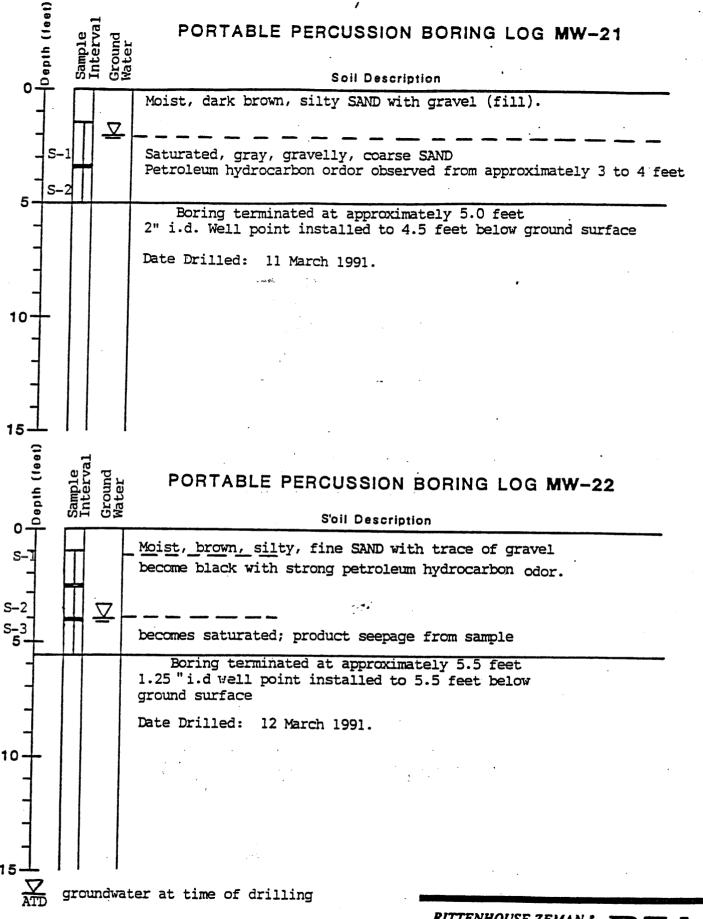
RITTENHOUSE-ZEMAN & A Geotechnical / Hydrogeologica	l Consult	INC.			RING NUM				1 -	Ever			4558- Plant	
SOIL DESCRIPTION	DEPTH (FEET)	LAB TESTS	SAMPLING	GROUND	ST		ARD 4 (140 I	BLO	ows	PER	FOO	T		ICE
	001	2	Ś	উ ≯	0	10		20			30		40	56
Loose to medium dense, wet to saturated, dark to black, gravelly, silty, fine SAND (Fill)	brown _		I	∇										
Loose, saturated, gray, silty, fine to medium with a trace to some gravel and wood debris (F	5 SAND ill)		\mathbb{I}			A								
Soft, saturated, brown, silty PEAT														
Total depth 11½ feet Boring completed 10 March 1988	-15													
				·										
	-20			·										
	-25													
													2.4442 13.	
	-30 - -													
	-35													
SAMPLING	40										,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
I 3' OD SHELBY SAMPLE 2.5' ID RING SAMPLE	WATER LE	EVEL '	\overline{a}	SEAL DATE OBSERV WELL			•	% (WAT	 NA	ONTI	ENT QUID L WA	LIMIT	



RITTENHOUSE-ZEMAN & ASSOCIATES, INC.
Geotechnical Consultants
1400 140th N.E.
Bellerue, Washington 98007

(206) 746-8020



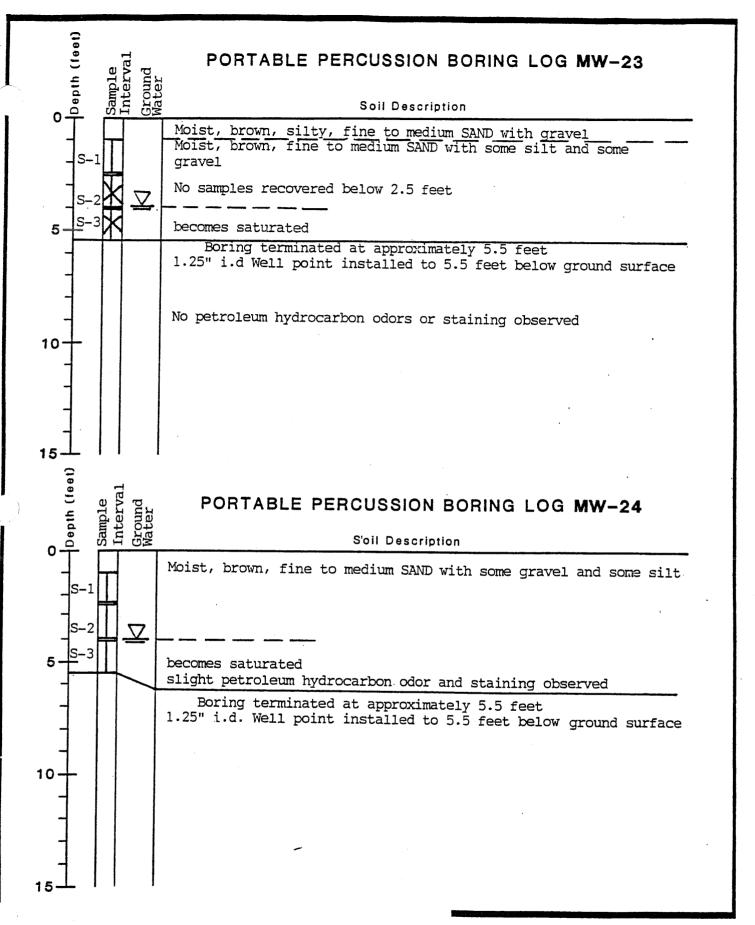


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Geotechnical Consultants

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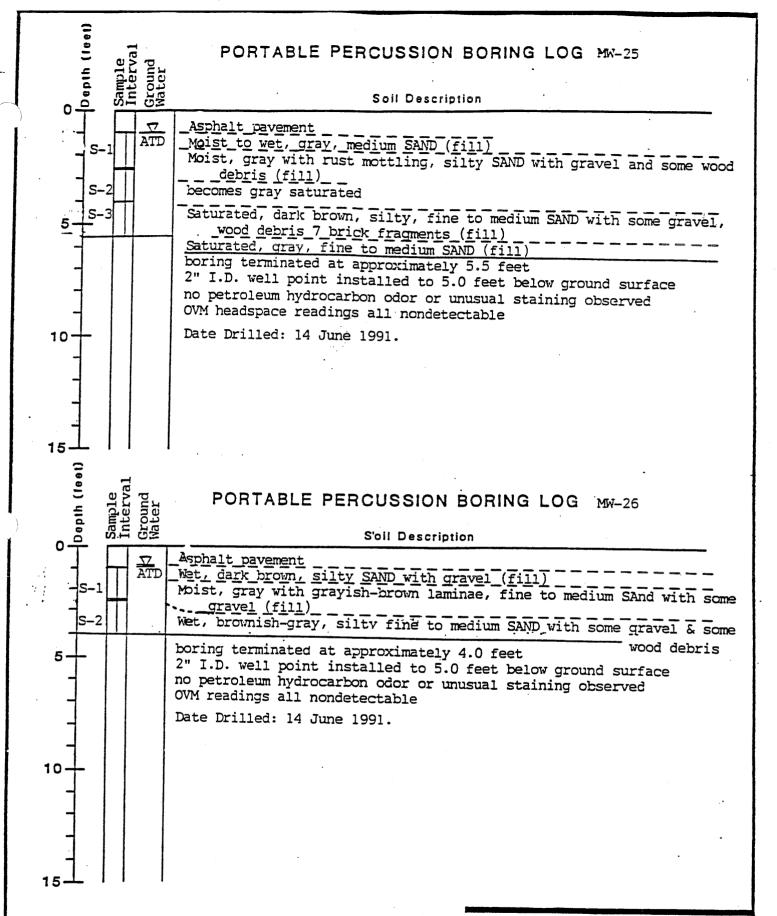




RITTENHOUSE-ZEMAN & ASSOCIATES, INC. Geotechnical Consultants

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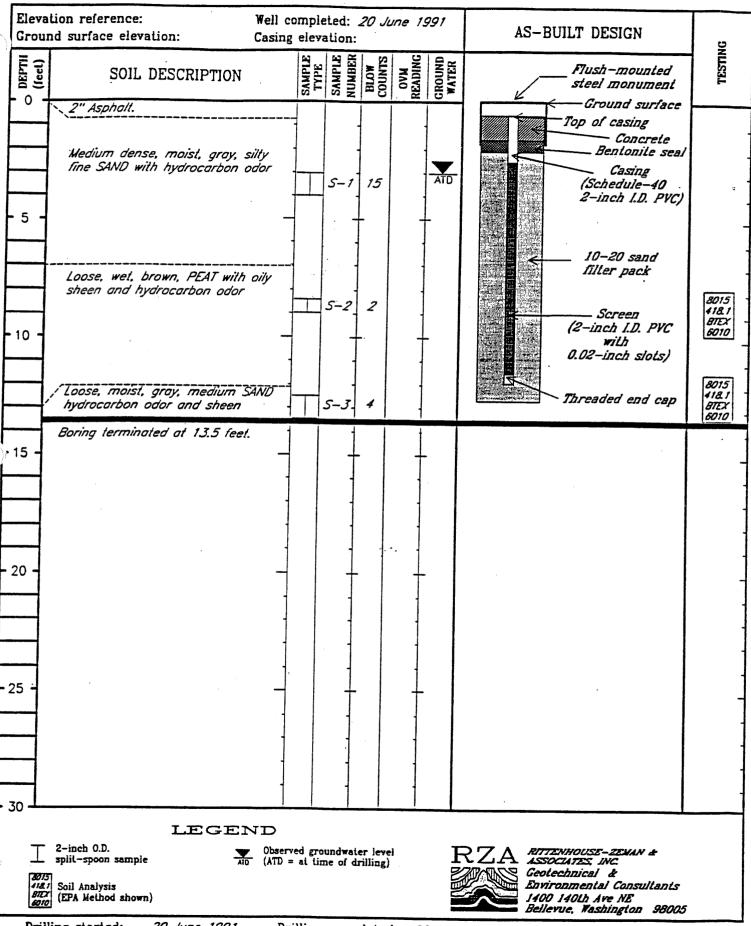


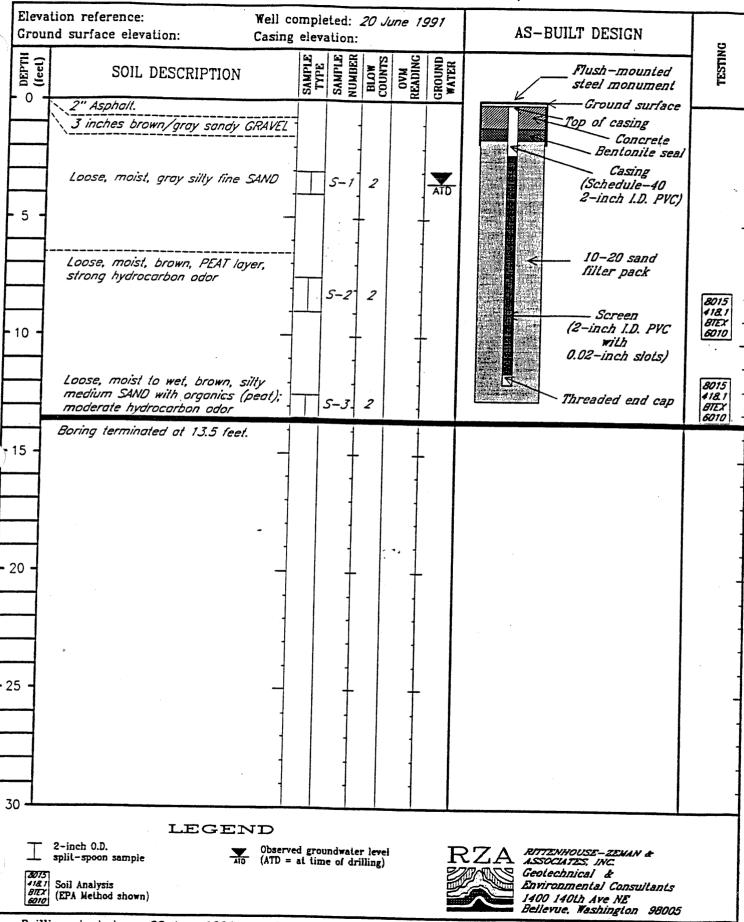
▼ groundwater level at time of drilling

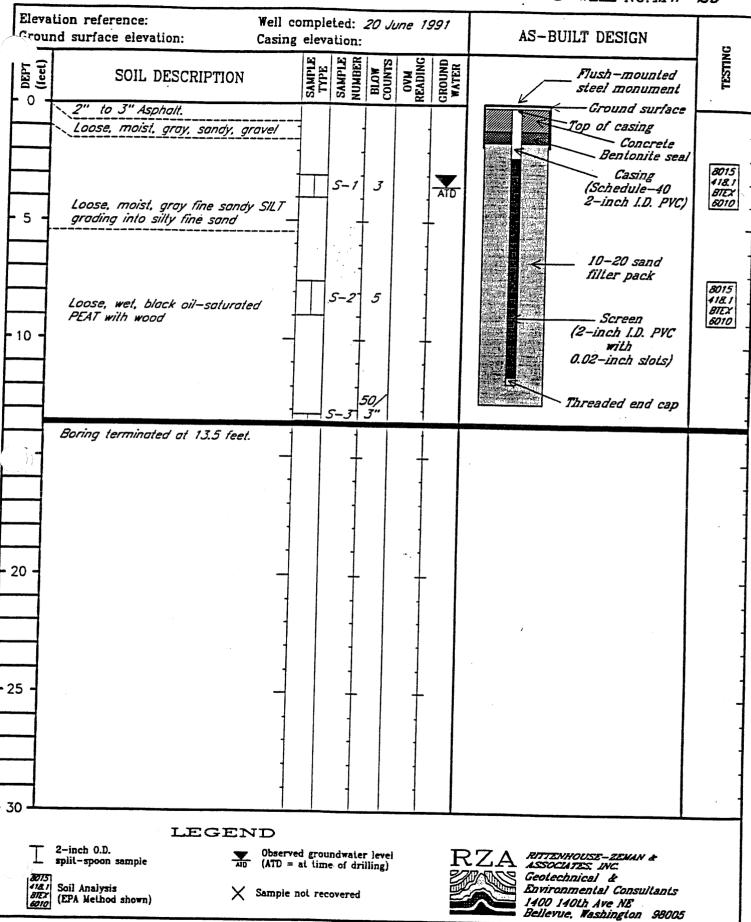
RITTENHOUSE-ZEMAN & ASSOCIATES, INC.
Geotechnical Consultants

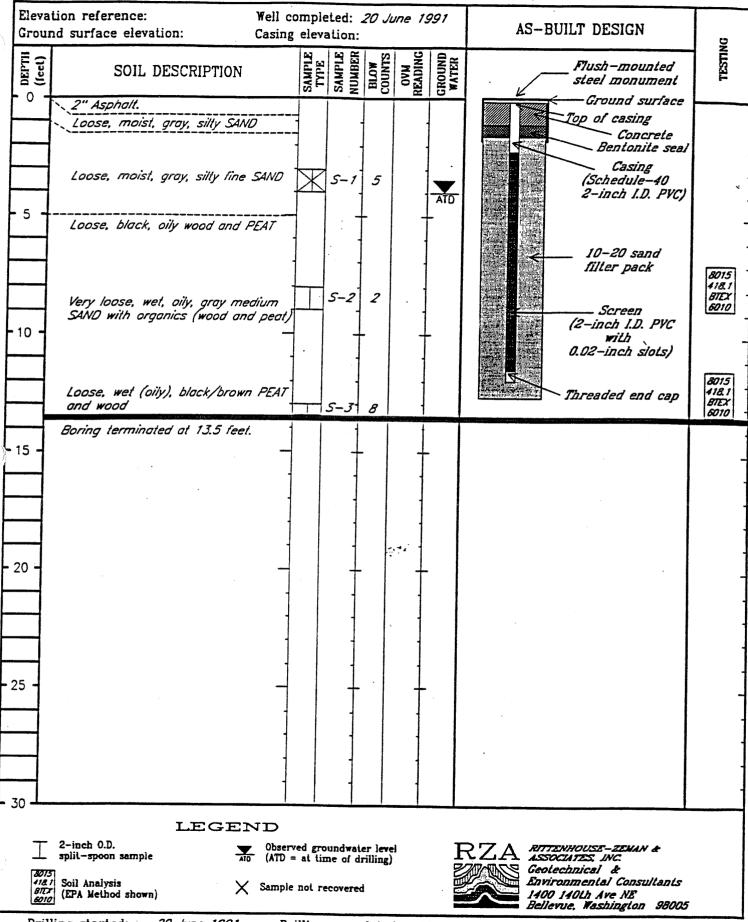
1400 140th N.E. Bellerue, Washington 98007 (206) 746-8020











PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-3 Elevation reference: 100.00 feet Well completed: 07 December 1993 Ground surface elevation: Unknown Page 1 AS-BUILT DESIGN Casing elevation: 98.58 feet of I DEPTH (feet) SAMPLE NUMBER SAMPLE TYPE OVM READING BLOW SOIL DESCRIPTION Flush-mounted TESTIN steel monument 0 Asphaltic Concrete Ground surface Top of casing Cement Medium dense, wet, brownish-gray, fine SAND with gravel (Fill). Slight pertoleum-S-1 Bentonite 25 5 like odor observed Casing 5 (Schedule-40 2-inch I.D. PVC) 10-20 sand 12/8/93 filter pack Loose, wet to saturated, dark greenishgray, SAND with some gravel and wood S-2 6 5 debris (Fill) Screen 10 (2-Inch I.D. PVC with 0.010-inch slots) Medium dense, saturated, dark gray, medium SAND with wood debris S-3 22 5 Riveted slip cap 15 Bottom of boring at 15 feet. 20 25 30 LEGEND RZA AGRA, Inc. 2-inch O.D. Geotechnical & Environmental Group split-spoon sample Observed groundwater level 0/00/00 = date observed 11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918 Drilling started:

07 December 1993

Drilling completed:

07 December 1993

Logged by:

TJP

PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-32 Elevation reference: 100.00 feet Well completed: 07 December 1993 Page 1 Ground surface elevation: Unknown AS-BUILT DESIGN Casing elevation: 99.17 feet of 1 SAMPLE NUMBER OVM READING DEPTH (fect) SAMPLE TYPE BLOW GROUND WATER SOIL DESCRIPTION Flush-mounted TESTING steel monument 0 Ground surface Gravel surface Top of casing Cement Mediun dense, wet to saturated, greenish-gray, gravelly, medium SAND Bentonite S-1 13 5 12/8/93 - Casing (Schedule-40 5 2-inch-I.D. PVC) 10-20 sand filter pack Medium dense, saturated, grayish-dark brown, medium SAND with gravel, some S-2 17 5 silt and wood fragments Screen 10 (2-inch I.D. PVC with 0.010-inch slots) Medium dense, saturated, grayish-dark brown, silty, fine to medium SAND with S-3 17 5 Riveted slip cap some gravel and wood fragments 15 Bottom of boring at 15 feet. No unusual staining or petroleumlike odors observed. 20 25

LEGEND

2-inch O.D. split-spoon sample

Observed groundwater level 0/00/00 = date observed

RZA AGRA, Inc. Geotechnical & Environmental Group

11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918

30

PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-35 Elevation reference: 100.00 feet Well completed: 07 December 1993 Ground surface elevation: Unknown Page 1 Casing elevation: 97.64 feet AS-BUILT DESIGN of 1 DEPTH (feet) SAMPLE TYPE SAMPLE NUMBER BLOW COUNTS OVM READING GROUND WATER SOIL DESCRIPTION Flush-mounted TESTING steel monument 0 Asphaltic Concrete Ground surface Top of casing Cement Medium dense, wet to saturated, gray, medium to coarse SAND with some S-1 12/8/93 21 Bentonite 5 gravel (Fill) Casing 5 Medium dense, saturated, greenish-gray, (Schedule-40 2-inch I.D. PVC) silty, fine to medium SAND (Fill) S-2 11 5 10-20 sand filter back Loose, saturated, brown, silty PEAT S-3 5 5 Screen 10 Loose to medium dense, saturated, gray (2-inch I.D. PVC to brownish-gray, SAND with trace to with S-A 8 5 0.010-inch slots) some silt, gravel and wood fragments (Chunk of wood stuck in sample tube; \$-5_ blow count probably not representative) 50/ S-5 5 Riveted slip cap 15 S-6 11 5 S-7 5 20 S-8 10 Native soil 5 backfill (caved) 5-9 17 5 25 S-10 14 5 Very stiff, saturated, brown, clayey SILT with organics (PEAT-Like) S-11] 17 5 Bottom of boring at 29 feet. 30 -No unusual staining or petroleumlike odors observed. RZA AGRA, Inc. **LEGEND**

Geotechnical & Environmental Group 2-inch O.D. Observed groundwater level 0/00/00 = date observed 11335 NE 122nd Way, Suite 100 split-spoon sample Kirkland, Washington 98034-6918 Drilling stanted: 07 December 1993 Drilling completed: 07 December 1993 Logged by:

ΤJP

PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-35 Elevation reference: 100.00 feet Well completed: 06 December 1993 Page 1 Ground surface elevation: Unknown AS-BUILT DESIGN Casing elevation: 103.96 feet of 1 OVM READING SAMPLE TYPE SAMPLE NUMBER DEPTH (feet) GROUND WATER BLOW SOIL DESCRIPTION Flush-mounted TESTING steel monument 0 Ground surface Top of casing Cement Dense, moist, gray, sitty, fine to medium SAND with some gravel Bentonite S-1 38 0 Casing (Schedule-40 5 2-inch I.D. PVC) 12/8/93 10-20 sand filter pack Loose, moist to saturated, gray, fine sandy SILT with some gravel S-2 6 0 Screen 10 (2-inch I.D. PVC with 0.010-inch slots) S-3 4 Ò Riveted slip cap 15 Bottom of boring at 15 feet. Field FT-IR analysis of samples S-1 and S-2 Indicated TPH concentrations of <50 ppm. 20 25 30 LEGEND RZA AGRA, Inc.
Geotechnical & Environmental Group 2-inch O.D. split-spoon sample Observed groundwater level 0/00/00 = date observed 11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918

Drilling started:

06 December 1993

Drilling completed:

06 December 1993

Logged by:

GKS

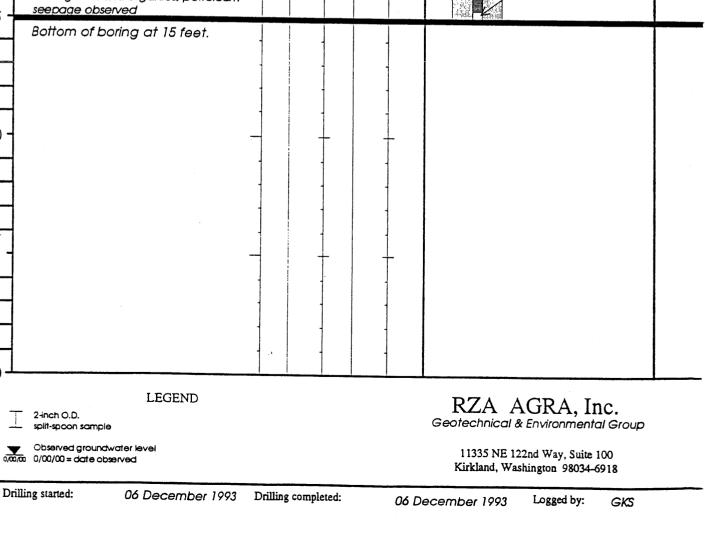
PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-36 Elevation reference: 100.00 feet Well completed: 06 December 1993 Page 1 Ground surface elevation: Unknown AS-BUILT DESIGN Casing elevation: 99,91 feet of 1 SAMPLE TYPE SAMPLE NUMBER BLOW COUNTS OVM READING DIEPTH (feet) GROUND Flush-mounted SOIL DESCRIPTION TESTING steel monument 0 Ground surface op of casing Cement Medium dense, moist, blackish-gray, silty, 12/8/93 Bentonite fine to medium SAND with some gravel S-1 19 0 Casina (Schedule-40 5 2-inch I.D. PVC) Becomes very loose, with increasing silt content 10-20 sand filter pack S-2 2 0 Screen (2-inch I.D. PVC 10 with 0.010-inch siots) Wood debris S-3 Riveted slip cap 4 0 15 Bottom of boring at 15 feet. 20 25 30 **LEGEND** RZA AGRA, Inc. 2-inch O.D.

split-spoon sample

Observed groundwater level ommo 0/00/00 = date observed

Geotechnical & Environmental Group

11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918



Mobil/ADC W.O. 11-04558-09 WELL NO.MW-38 on reference: Unknown Well completed: 05 June 1996 Page 1 AS-BUILT DESIGN and surface elevation: Unknown Casing elevation: Unknown of 1 SAMPLE NUMBER OVM READING DBPTI (feet) SAMPLE TYPE BLOW GROUND 2° above ground SOIL DESCRIPTION TESTING steel monument 0 Top of casing Grass and Roots Loose, moist, dark brown, sitty SAND with Ground surface gravel (strong petroleum hydrocarbon-like odor) WW-38/ 2.5 Bentonite Casing (Schedule-40 5 2-inch I.D. PVC) MW-38 10 0.0 5.0 ATD 10-20 sand filter pack MW-38/ 50/ 0.0 7.5 Screen (2-inch I.D. PVC with Medium dense, saturated, brown WOOD 10 0.02-inch slots) CHIPS with trace silt (Fill) (strong WW-38/ 11 0.0 Threaded end cap petroleum hydrocarbon-like odor) 10.0 Bottom of boring at 12.5 feet. 15 20 25 30 **LEGEND △**AGRA 2-Inch O.D. Observed groundwater level spiit-spoon sampie ATD = at time of drilling Earth & Environmental 11335 NE 122nd Way, Suite 100 Grab sample Kirkland, Washington 98034-6918

HOTATION 20 -	tu
* WW-1	



HOLE NOKBL	<i></i>
SHEETL_OF_	1
TOTAL DEPTH	5.0
DATE BEGUN 61	
DATE COMPLETED	415/16

EATHER portly cloudy, 50's

TEST BORING LOG

• · · · • • · · · • · · · · · · · · · ·	
MOBIL/ADC.	
11-04558-09	T17
inee RAL	
TOR DREW CASCADE	
HSA	

GROUNDWATER TABLE SAMPLING arb arms of all Novae with a con-DEPT- NIEET 0430 ٠..: 6/5/16 2-18 SAMPLING MOTHOD SOT STANDARD PENETRATION TEST TO TUBE RERING DEM

SOIL DESCRIPTION

GRASS AND ROOTS OVER BACKFILL BENTINITE TO APPROX. 5.6 Feet

1		-	5mm dense, saturated, dark brown silty SAND with GARVER (5m) - wood clebris, free product (oil), strong sil. No symple for removence
γρω-ι), 7 <u>.</u> 5	8 4	II	Pt stiff, moint saluated, brown PEAT - trace silt, strong oder. HNU=14pp
			50 m. dense, saturated, gray brown SAND with sict (50) - trace prat, wood debris from 10-10.5 feet, strong odor. HINU = 40 ppm
\ \ \ \ \ \ \ \ \ \ \ \ \	6 5	I	Stiff, sulvented, brown DEAT-trace silt, strong oder HANG = 5 ppm
			DRILL OUT TO 15' LIGHVING SAND 3 0:5 THREADED CAP.
			3
			140 16 - 30" Drop

BORING LOG **SUMMARY**

	1	3 I	3	A	
.arth	&	Er	V	ironmen	tal

MONITORING WELL AS-BUILT REPORT

			PROJECT No. 11-04558-09
∠ NTION			PROJECT NAME MOBIL / TO
RVED E د	BY STL		BORING/WELL I.D. VRW-1
•	STALLER CASCADE	-	DATE 6/5/4
SOIL TYPE	•		
			1
			-BOVE GROUND REER HEIGHT (IF APPLICABLE)
	+2.0		MONUMENT TYPE IF APPLICABLE)
	(WELL CAP TYPE locking
		ļ	
	•	-,	
			GROUT TIPE/=SACKS
	6 SORFACE		
			BENTONITE SEAL /=SACKS
			BENTONITE SEAL FOR SACIO
		<u> </u>	WELL CASING I.D. 4"
			TYPE OF CASING Schoole 40 PUC
	6		TYPE OF CONNECTION Thread-d
	<u>2</u> .		
	•		FILTER PACK/SIZE/#SACKS_ & X/Z
•	<u></u>	<u>.</u>	
	·		
			WELL SCREEN I.D. 4"
			TYPE OF SCREEN 'V' SCICEN
			SLOT SIZE 0.030
	•		
•			
			DIAMETER OF BOREHOLE 12"
			DIAMETER OF BOREHOLE
-			
	140 145		
	· ·		ENDCAPTYPE threaded (0.5' points)
	14.5	- ·	
REMARKS			

		11.4-
at.	200	
1/2	WW-1	
-	VIC00-1	1
!		į

SAMPLING

MAGRA

Earth & Environmental

bRW-1 SHEET (OF

-דפפת נגדסד 15.0

DATE BEGUT. 6/5/96 DATE COMPLETED

THEE portly cloudy, 50's

TEST BORING LOG

GROUNDWATER TABLE MOBIL/ADC - PROJECT NAME

11-04558-09

ATDEAT TIME OF DRILLING ASEAFTER BORING PROJECT NUMBER

GEOLOGIST, ENGINEER

DRILLING CONTACTOR FOREM CASCAPE

METHOD USED

Sampling method ispt=standard penetration test it=tube r=ring in $\mathbb{D}
otin \mathbb{M}$

SOIL DESCRIPTION

GRASS AND ADOTS OVER BACKFILL BENTONITE TO APPROX. 5.0 Rect

0430

615/46

TIME

TI im m dense, saturated, dark brown silty sand with GANEL (sm) - wood clebris, free product (oil), strong sil. No symple for MENOSPACE

stiff, moist-salurated, brunen PEAT - trace sict, strong oder HNU=14ppm

12 II sp m. dense, saturated, gray brown SAND with sict (SP) - trace prat,
11 I sp m. dense, saturated, gray brown 10-10.5 feet, strong odor.
8 I NNU = 40ppm

Stiff, suturated, brown PEAT - trace sitt, strong odor HNU - 5 ppm

DRILL OUT TO 15' MEAVING SAND 0.5 THREADED CAP.

BORING LOG SUMMARY

	Α	G	R	A			
Ear	th a	& E	nv	iro	nm:	enta	i

MONITORING WELL AS-BUILT REPORT

Unitten/INSTALLED		BORING/WELL I.D. VRW-1 DATE 6/5/46
SOIL TYPE DEPTH		
+2.0		ABOVE GROUND RESERVEIGHT (IF APPLICABLE) MONUMENT TYPE - APPLICABLE) WELL CAP TYPE - Locking
6 SOR	FACE	GROUT FFE/=SACKS
.) _i		
2		WELL CASING I.D. 4" TYPE OF CASING Schoole 40 PUC TYPE OF CONNECTION Thread-d
		FILTER PACK/SIZE = SACKS 672
		WELL SCREEN I.D. 4" TYPE OF SCREEN "V" Sercen SLOT SIZE 0.030
		DIAMETER OF BOREHOLE 12"
14.0 14.5 14.6 REMARKS	· · · · · · · · · · · · · · · · · · ·	ENDCAPTYPE + hreaded (0.51 points)

	ng No: AD-01 : 1-15-90
location of boring: Location: Bulk Terminal-Everett, WA Dril: Hole	ler: D. Alford ling Method: Hand Auger Diameter:2" No: 1 of 1
epth Graphic (ft) Log Blow/ft Concentration (ppm) Sample type Soil Group Symbol (U.S.C.S.) 3.0' Water Level Time Date Comments:	
Sample @ 0.5-1.0' sp 0.5-1.0 Sand, coarse grained, occasional g loose, soitst, no odor. 2 -	n, loose, very moist, ght grey brown, very

			LOG			Project No:	05-487-	001		Boring No: AD-02
-		EXI	PLORATOR	Y BORING		0146-5				Date: 1-15-90
	1000000000	<u> </u>				Client: Ame				Driller: D. Alford
<i>:</i> -	location of	boring:				Location: Bu	lk Term	inal-Ever	ett, WA	- 1
										Hole Diameter: 2"
						Logged by: D				Page No: 1 of 1
						Installation	Data:	Backfill	with env	iroplug
		T	Vapor	Sample type	Soil Group	Water Level	Time	Date	Commen	+
Jepth	Graphic	Blow/ft	Concen-	j.	Symbol		11110	Date	Condien	cs:
(ft)	Log		tration	1	(U.S.C.S.)	approx.			1	
. ,			(ppm)			2.0'				
0 -		:				Grass		l		
-				Sample @	sp	0.5-1.0' Sand	, coars	se grained	with oc	casional gravel, saturated,
1 -	មានចំពោះ	3		0.5-1.0'				coleum odo		g, 520122501,
-		1					-			
2 -										
-				Sample @	sm	2.5-3.0' Sand	, coars	e grained	with gra	ey/green clayey silt,
3 -				2.5-3.0'						leum odor, irridescent
-	TD = 3.0'						n on wa			
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-										
5 -										
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- [l		Groundwater at	appro	ximately 2	21	
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		EXI	LOG (OF Y BORING		Project No: 05-487-001 Boring No: AD-03 Date: 1-15-90
- 74	location of boring:					Client: American Distributing Co. Driller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Hand Auger Hole Diameter: 2" Logged by: D. Alford Page No: 1 of 1 Installation Data: Backfill with enviroplug
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	1	Water Level Time Date Comments: Approx. 2.0'
0	TD = 2.0'			Sample @ 0.5-1.0' Sample @ 1.5-2.0'	sc	0.5-1.0 Sand, coarse grained, with clay and occasional pebbles/gravel, light brown, moist, no odor. 1.5-2.0 Sand, coarse, grained, increased clay content with gravel, light grey-brown, wet, no odor. Groundwater at approximately 2.0'

		EXI	LOG (Project No:				Boring No.: AD-04 Date: 1-15-90
ie.	ocation of h	ooring:				Client: Amer Location: Bui Logged by: D. Installation	lk Term	inal-Evere d	tt, WA	Driller: D. Alford Drilling Method: Hand Auge Hole Diameter: 2" Page No: 1 of 1
pth ft)	Graphic Log	Blow/ft	Vapor Concentration (ppm)	and Depth	1	Water Level	Time	Date	Comment	· · · · · · · · · · · · · · · · · · ·
0 - 1 -	TD = 1.0'			Sample @ 0.5-1.0	ap	0.5-1.0 Sand,		lly, coarse		sand, light brown to grey,
						Groundwater at	t appro	oximately 9	inches.	
						·				
- ' - -)									
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	1 2									

			LOG	OF		Project No:	05-487-	001		Boring No: AD-05
7		EXI	PLORATOR			Client: Ame			na Co.	Date: 1-15-90 Driller: D. Alford
i.e	ocation of h	poring:				- 1			-	Drilling Method: Hand Auger
						Logged by: D			rith envi	Hole Diameter: 2" Page No: 1 of 1 roplug
	Graphic Log	Blow/ft	Vapor Concen- tration	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	ts:
10)	Log		(ppm)		(0.3.0.3.)	Approx.				
0	TD = 3.0'			Sample @ 1.5-2.0' Sample @ 1.5-2.0' Sample @ 2.5-3.0	sc .	mois 1.5-2.0' Sand mois 2.5-3.0' Sand	t, some	e gravel, ey, coarse ght petrol ey, coarse e gravel,	slight pe grained, eum odor. grained, slight pe	sand, light grey, loose, etroleum odor. , light grey, loose, etroleum odor.
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			LOG			Project No: 05-4	487-001		Boring No: AD-06
7	location of I		PLORATOR	Y BORING		Client: America Location: Bulk T Logged by: D. Al Installation Dat	Germinal-Evere	tt, WA	Date: 1-15-90 Driller: D. Alford Drilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level Ti	me Date	Commen	
0 -	TD = 1.0'			Sample @ 0.5-1.0	sp	0.5-1.0 Sand, coa	arse grained,	gravelly	y, loose, moist, moderate
3 - - 4 - - 5 -						Groundwater at ap	oproximately 5	.0′	
-)								
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			LOG	OF .		Project No:	05-487-	001		Boring No: AD-07
			LORATORY	BORING		Client: Ame			ng Có.	Date: 1-15-90 Driller: D. Alford
1	location of b	oring:				Location: Bu	lk Term	inal-Evers	ett, WA	Drilling Method: Hand Auger Hole Diameter: 2"
						Logged by: D			ith Envi	Page No: 1 of 1
epth	Graphic Log	Blow/ft	Vapor Concen- tration	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	its:
(/	209		(ppm)			6"				
0 -				Sample @ 0.5-1.0"	sp	I .				ly, loose, moist to wet,
2 -	TD = 1.0'					Groundwater a	t annr	vimatoly (- inches	38
3 - 						oroundwater a	c appro	ermately (Tuches	•
4 -						·				
5 -										<i>,</i>
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-	location of b		LOG	OF Y BORING		Project No Client: A Location: Logged by: Installation	merican Di Bulk Termi D. Alford	stributir .nal-Evere	ett, WA	Hole Diameter: 2" Page No: 1 of 1
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:
0 -				Sample @ 0.5-1.0'	sm sm	1.5-2.0' s	ight brown and. coars o dark bro	n, dry, no se grained own, loose	o odor. d, gravel e, moist,	gravel, medium grained, lly, some silt/clay, light to no odor.
3 - 4 - 5 -				Sample @ 2.5-3.0' Sample @ 4.5-5.0'	sc sc	4.5-5.0′ S.	trong petr	oleum odd	or. occasiona	l gravel, light grey, moist l gravel, light grey, moist rated at 5.0'
	TD = 5.0'					Groundwater	at approx	imately 5	.0'	
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		*	LOG	OF		Project No: 05-487-001	Boring No: AD-09
		EXI	PLORATOR:	Y BORING		13. 33.	Date: 1-16-90
	\					Client: American Distributing Co.	Driller: D. Alford
4	location of b	oring:				Location: Bulk Terminal-Everett, WA	Drilling Method: Hand Auger Hole Diameter: 2"
						Logged by: D. Alford	Page No: 1 of 1
						Installation Data: Backfill with Env	iroplug
			Vapor			Water Level Time Date Commer	nts:
epth (ft)	Graphic Log	Blow/ft	Concen- tration	1	Symbol (U.S.C.S.)		
. ,			(ppm)	-	(0.3.0.5.)	Approx.	
0 -							
-				Sample @	sp	0.5-1 0' Sand coarse emined when	
1 -				0.5-1.0		0.5-1.0' Sand, coarse grained, with moist, no odor.	occasional gravel, loose,
2 -				Sample @	sp	1.5-2.0 Sand, with gravel, slightly	loose, wet, petroleum odor.
-	TD = 2.0'			1.5-2.0'			
3 -							
4 -						G	
-						Groundwater at approximately 1.5'	
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.e ~		EXI	LOG (Project No:	05-487-	-001		Boring No: AD-10	
	\					Client: Ame	rican D	Distributir	ng Co.	Date: 1-16-90 Driller: D. Alford	
ζ.	ocation of b	oring:								Drilling Method: Hand A	ıger
						Logged by: D	116-			Hole Diameter: 2"	
						Installation			ith Envi	Page No: 1 of 1	
	T	T	1					T			
pth	Graphic	Blow/ft	Vapor Concen-		Soil Group Symbol	Water Level	Time	Date	Commen	ts:	
(t)	Log		tration	1 -	(U.S.C.S.)	Approx.					
			(ppm)			1.25′					
-								l	l		
-				Sample @	sp	0.5-1.0' Sar	d with	gravel, l	oose, wet	t, visible oil stains,	
-		•		0.5-1.0'		шос	erate p	petroleum (odor.		
-	TD = 1.5'										
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-						Groundwater a	t appro	eximately 1	25′		
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		PY.	LOG (PLORATOR)			Project No	: 05-487-	-001		Boring No: A	
- \	location of i		PLORATOR	DORING		Client: An Location: I Logged by:	Bulk Term D. Alfor	d	ett, WA	Hole Diamete	Alford hod: Hand Auge
pth ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:	
	TD = 2.0'			Sample @ 0.5-1.0' Sample @ 1.5-2.0'	ab	1.5-2.0′ Sã	oderate p undy grav oderate o	etroleum el, loose dor.	odor. , wet, vi	t, visible oil	stains,

		EXI	LOG	OF Y BORING		Project No:	05-487-	-001		Boring No: AD-12
	ocation of h					Client: Ame Location: Bu Logged by: D Installation	lk Term	inal-Ever	ett, WA	Hole Diameter: 2" Page No: 1 of 1
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:
0 -				Sample @ 0.5-1.0'	sp	no	petrole	eum odor.		rained, brown, loose, moist,
3 - - 4 - - 5 -	TD = 3.5'			2.5-3.0' Sample @ 3.0-3.5'		vis: 3.0-3.5' Sand	ible oi	l staining um grained	, strong	ly, grey brown, loose, diesel odor. ly, grey, wet, strong
-						Groundwater at	approx	cimately 3	.5′	
-										
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			LOG			Project No:	05-487-	-001		Boring No: AD-13
		EX	PLORATOR	Y BORING						Date: 1-16-90
						_ Client: Am				Driller: D. Alford
ield	location of b	oring:		·		Location: B	ulk Term	inal-Evere	ett, WA	Drilling Method: Hand Auger
										Hole Diameter: 2"
						Logged by:				Page No: 1 of 1
						Installatio	n Data: 1	Backfill w	ith Envi	iroplug
	r		т			-				
	1		Vapor	1	1	Water Level	Time	Date	Commen	its:
∍pth	Graphic	Blow/ft	Concen-		1 -		-			
ft)	Log	l	tration	1	(U.s.c.s.)	1				
		ĺ	(ppm)			2.5'				
	1777		l	-		.	.			
0 -					1					
				Sample @	sm	0.5-1.0' Sa	nd, silt	y with oc	casional	gravel, light brown-brown,
1 -			İ	0.5-1.0'		mo	ist, mod	ierate pet:	roleum o	dor.
2 -				Sample @	ab					loose, very moist, visible
. 1			•	2.0-2.5		pe	troleum	staining,	strong	petroleum odor.
3 -	TD = 2.5'		į							
	1					Groundwater	approxim	ately 2.5'	•	
4 -										
						Note: Possi	ole free	product o	n ground	d water. Ground water has
5 -	• [irrid	escent f	ilm and oi	l stream	ning from soil in capillary
-						zone.				
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			LOG			Project No	: 05-487-	-001		Boring No: AD-14	
	location of h		PLORATOR	Y BORING		Client: An Location: 1 Logged by: Installation	Bulk Term	d	ett, WA	Date: 1-16-90 Driller: D. Alford Drilling Method: Hand Aug Hole Diameter: 2" Page No: 1 of 1 roplug	er
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	e Soil Group Symbol (U.S.C.S.)		Time	Date	Commen	ts:	
0	TD = 2.5'			Sample @ 0.5-1.0' Sample @ 2.0-2.5'	ap ap	2.0-2.5' Sa	nist, mod	derate pet	roleum oo rse grain	ned, brown-dark brown, loos dor. ned, brown-dark brown, loos n odor, visible staining.	
4 - 5						Groundwater					
						,			-		

			LOG C)F		Project No:	05-487-	001		Boring No: AD-15
i/	Cocation of b		PLORATORY	BORING		Client: Ame				Date: 1-17-90 Driller: D. Blaes
1	pocation of t	ooring:				Location: Bu Logged by: D Installation	. Blaes			Hole Diameter: 2" Page No: 1 of 1
∍pth 'ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:
0 1 2				Sample @ 0.5-1.0'	sp	odo	or.			d, brown, dry, loose, no
3 -	TD = 3.0'			2.5-3.0'			, very	strong gas	oline o	dor.
4 - - 5 -						Groundwater a	pproxim	ately 3.0'		
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		EXI	LOG (Project No:			Boring No: AD-16 Date: 1-17-90		
ie	ocation of t	poring:	•			Client: Ame Location: Bu Logged by: D Installation	lk Term	ninal-Ever	Driller: D. Blaes Drilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1 .roplug		
epth (ft)	Graphic Log	Blow/ft	Vapor Concentration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:	
0 -	- 1 E/			Sample @ 0.5-1.0'	sp					grey, loose, wet, visible	
2 - - 3 - - 4 -	TD = 1.5'					Groundwater a	t appro	oximately	1.5′		
- 5 - - -											
- -)	•									
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		EXI	LOG (Project No:	05-487-	001	Boring No: AD-17 Date: 1-17-90			
	location of 1	poring:			-	Client: American Distributing Co. Location: Bulk Terminal-Everett, WA Logged by: D. Blaes Installation Data: Backfill with Envi				Driller: D. Blaes Drilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1		
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:		
0 1 2 -	TD = 1.0'			Sample @ 0.5-1.0'	gp	Grass 0.5-1.0' Sand		mm grained,		. dark grey	loose, wet	.,
- 3 - - 4 -						Groundwater a	t appro	ximately l	0'			
- -	1											
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		EXI	LOG PLORATOR	or Y Boring		Project No:	vo-487-	-001		Boring No: AD-18 Date: 1-17-90		
-						Client: Ame	rican T)istributir	ar Co	Driller: D. Alford		
ii	ocation of b		Location: Bu									
									y**	Hole Diameter: 2"		
						Logged by: D	. Blaes	;		Page No: 1 of 1		
						Installation			ith Envi			
			Vapor	Sample type	Soil Group	Water Level	Time	Date	Commen	ts:		
2pth	Graphic	Blow/ft	Concen-	and Depth	Symbol							
ft)	Log		tration		(u.s.c.s.)	Approx.						
			(ppm)			4.5'						
									l			
0 -	0777777777777											
-				Sample @	sc	0.5-1.0' Sand	, clay	ey, brown,	slightly	y cohesive, moist, no odor		
1 -				0.5-1.0'	вс					, brown to grey, organic		
-										moderate diesel odor at		
2 -						2.0-						
- 1						·				•		
3 -												
- [ļ										
4 -				Sample @	sc	4.0-4.5' Sand	, medir	ım grained	claveu	grey to black, moderate		
- 7	77777777777			4.0-5.0'				liesel odor		31 to Diacu, moderate		
5 -	TD = 4.5'						9	.10301 0001	•			
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-	-	1				Groundwater at	- 20050	vimatalu 4	e,			
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		EXI	LOG (Project No: (05-487-	-001		Boring No: AD-19 Date: 1-17-90		
<u>-</u>	ocation of	boring:				Client: Amer Location: Bul Logged by: D. Installation	lk Term	ninal-Evere	ett, WA	Driller: D. Blaes Drilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1		
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:		
0	TD = 1.5'			Sample @ 0.5-1.0' Sample @ 1.0-1.5'		mois 1.0-1.5' Sand	t, mode, fine t, soil	erate dies to medium l saturate uct on gro	el odor. grained, d with di undwater	grey to black, loose, tesel fuel oil. surface)		
-			-									

TEST PIT LOGS

Depth (feet)	Soil Classification	11-04558-04
	Test Pit TP-1	
0.0 - 0.5	Gravel surface	
0.5 - 1.5	Loose, wet, dark grayish-brown, silty SAND with gravel (Fill)	
1.5 - 3.5	Loose, wet to saturated, gray, coarse SAND with gravel	
	Strong petroleum-like odor and black oily staining observed;	
	Test pit terminated at approximately 3.5 feet	
	Moderate groundwater and liquid petroleum hydrocarbon seepage belo	w 3 feet
	Field FT-IR analysis indicated > 4,600 ppm TPH at 3 foot depth	
	Test Pit TP-2	
0.0 - 0.5	Gravel surface; old A/C at 0.5 feet	
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel	
	No unusual odors or staining observed;	
	Test pit terminated at approximately 4.0 feet	
	Moderate groundwater seepage observed below 3.5 feet	
	A large block of concrete encountered at a depth of approximately 1 for	ot
	Field FT-IR analysis indicated 30 ppm TPH at 3.5 foot depth	
	Test Pit TP-3	
0.0 - 0.5	Gravel surface old A/C at 0.5 feet	
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel	
	Test pit terminated at approximately 4.0 feet	
	Moderate groundwater seepage observed below 3.5 feet	
	Slight surface sheen observed on groundwater emanating from the east s	side of the test
	pit .	

Field FT-IR analysis indicated 80 ppm TPH at 3.5 foot depth

Depth (feet)	Soil Classification
	Test Pit TP-4
0.0 - 0.5	Gravel surface
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel
	Test pit terminated at approximately 4.0 feet
	Moderate groundwater seepage observed below 3.5 feet
	No unusual odors or staining observed
	Field FT-IR analysis indicated 30 ppm TPH at 3.5 feet
	-
	Test Pit TP-5
0.0 - 0.5	Gravel surface
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel
	Test pit terminated at approximately 4.0 feet
	Moderate groundwater seepage observed below 3.5 feet
	No unusual odors or staining observed
	Field FT-IR analysis indicated 50 mm. TDLL at 0.5 feet
	Field FT-IR analysis indicated 50 ppm TPH at 3.5 feet

Date excavated: 8 December 1993

Logged by: TJP

Backhoe Test Pit Logs

TP-1-96

Gray, moist to wet, silty SAND with gravel and some cobbles. Met with refusal at a depth of approximately 3.0 feet due to buried concrete. Slow seepage observed at approximately 1.5 feet. Soil exhibits a petroleum hydrocarbon-like odor. After approximately 1.5 hours, discontinuous blebs of LPH were observed on the water accumulated in the test pit.

TP-2-96

Brown, moist to wet, silty SAND with gravel and some wood and metal debris; becomes gray below approximately 1.0 feet. Slow seepage observed at approximately 1.0 feet and again below approximately 4.0 feet. Soil exhibits a petroleum hydrocarbon-like odor. After approximately 1.5 hours, discontinuous blebs of LPH were observed on the water accumulated in the test pit. Test pit terminated at approximately 4.5 feet.

TP-3-96

Gray, moist, gravelly SAND with some silt with scattered wood and brick debris. Underlain at approximately 4.0 feet by gray, wet to saturated, cohesive, silty, fine to medium SAND. Slow seepage observed at approximately 1.5 feet. Moderate seepage observed below a depth of approximately 6.0 feet. Soil exhibits a petroleum hydrocarbon-like odor. No LPH observed; sheen present of water accumulated in the test pit. Test pit terminated at approximately 6.5 feet.

Backhoe Test Pit Logs

TP-4-96

Brown, moist to wet, silty SAND with some gravel; becomes gray with a petroleum hydrocarbon-like odor below 2.5 feet. Slow seepage observed below approximately 5.0 feet. Discontinuous blebs of LPH observed on the groundwater accumulated in the bottom of the test pit. Test pit terminated at approximately 6.0 feet.

TP-5-96

Brown, moist to wet, silty SAND with some gravel with some brick and glass debris; becomes gray with a petroleum hydrocarbon-like odor below 2.5 feet. Slow seepage observed below approximately 5.0 feet. Encountered a 4-inch diameter clay pipe at approximately 4.5 feet. LPH and water drained from the pipe for approximately 10 to 15 minutes after digging through the pipe. Discontinuous blebs of LPH observed on the groundwater accumulated in the bottom of the test pit. The LPH appeared to originate from both seepage from the soil and infiltration from the broken clay pipe. Test pit terminated at approximately 6.0 feet.

TP-6-96

Brownish-gray, moist to wet, silty SAND with gravel and wood debris; becomes gray with a petroleum hydrocarbon-like odor below approximately 2.0 feet. Moderate to rapid LPH and groundwater seepage observed below approximately 4.0 feet. Approximately 0.02 feet of LPH accumulated as a continuous layer on top of groundwater pooled inside of the test pit. Test Pit terminated at approximately 6.0 feet.

TP-7-96

Moist to wet, dark brown to black, SAND with some silt and gravel; strong petroleum hydrocarbon-like odor observed. Moderate LPH and groundwater seepage observed below 3.0 feet. LPH accumulated as a continuous layer on top of the groundwater pooled in the test pit. LPH thickness was approximately 0.10 feet. Test pit terminated at approximately 4.0 feet.

Page 1

APPENDIX D

SELECTED GEOTECHNICAL BORING LOGS

LOG OF BORING NO. DM-7-99 PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA WATER LEVEL: ¥7.00 ft CLIENT NAME: Port of Everett DATE STARTED: December 8, 1999 **ELEVATION: 18 ft** DATE COMPLETED: December 8, 1999 TOTAL DEPTH: 45.00 ft DRILLING CONTRACTOR: Cascade Drilling WEATHER: Light rain FIELD ENGINEER: BBS DRILLER: Scott Kruger DRILLING METHOD: Hollow Stem Auger to Mud Rotary CHECKED BY: SAMPLING METHOD: D&M U, 300lb hammer, 30" drop SAMPLE TYPE KEY: MOISTURE CONTENT (%) FINES CONTENT (%) ELEVATION (ft.) BLOWS PER FOOT Relatively undisturbed sample **Bag Sample** DEPTH (ft.) SAMPLE TYPE uscs DENSITY (Disturbed sample Sample attempt with no recovery SPT split spoon sample DÉSCRIPTION REMARKS 18 0 brown woody debris mixed in with brown silty SAND (FILL) SM Dark to reddish brown medium to fine SAND with trace silt and fine gravel (løose to medium dense with depth)(wet) 18 Petroleum Odor Detected in samples 1, 2, 3 (0 - 15 feet below ground surface) PID = 0 6.3 WA 9812 20

NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons

(hard)(low plasticity)

Gray SILT with some medium sand and trace gravel

25

30

ML.



22

18

18

DMSEA6.GDT

LOG OF BORING DM-7-99

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189

FIELD ENGINEER: BBS

CHECKED BY:

Sheet 2 of 2

PROJECT LOCATION: Everett, WA SAMPLE TYPE KEY: DRY
DENSITY (pcf)
MOISTURE
CONTENT (%)
BLOWS PER
FOOT FINES CONTENT (%) Relatively undisturbed sample Bag sample ELEVATION(ft.) DEPTH (ft.) GRAPHIC SYMBOL SAMPLE SSS Disturbed sample Sample attempt with no recovery SPT split spoon sample **DESCRIPTION** REMARKS 30 18 25.8 81 Brown medium SAND with some silt and trace of fine gravel SM (very dense)(wet) 35 107.2 15 50/6" 12 -22 40 109.8 11.4 68 18 45 100/10" 10 End of Boring at 46 feet below ground surface Ground water encountered at 7 feet below ground surface

NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons

AMES & MOORE A DAMES & MOORE GROUP COMPANY

LOG OF BORING DM-7-99

LOG OF BORING NO. DM-8-99

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett

DATE STARTED: December 1, 1999
DATE COMPLETED: December 1, 1999

DRILLING CONTRACTOR: Cascade Drilling
DRILLER: Scott Kruger

DRILLING METHOD: Hollow Stem Auger to Mud Rotary

WATER LEVEL: ¥5.00 ft

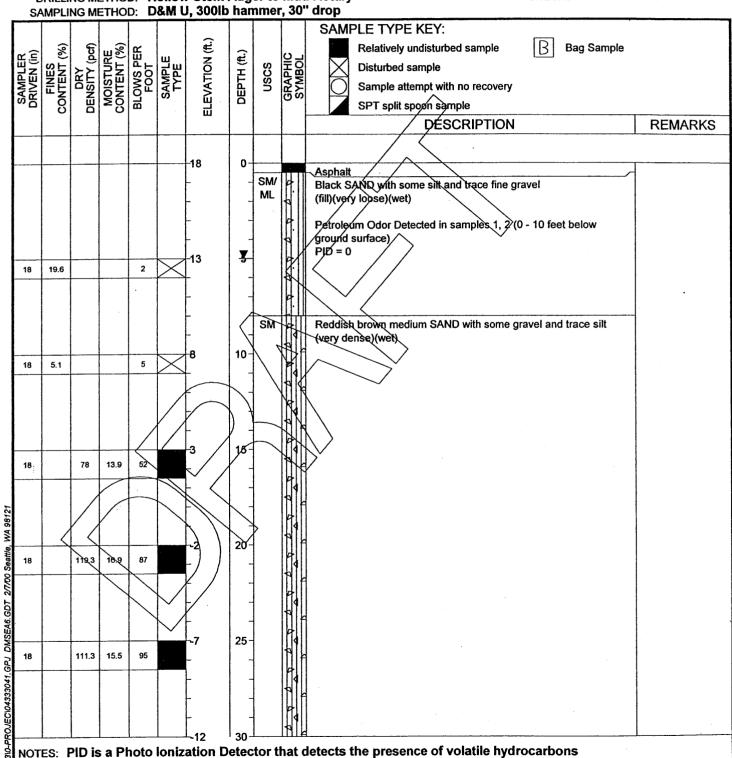
ELEVATION: 18 ft

TOTAL DEPTH: 50.00 ft

WEATHER: Overcast, light rain

FIELD ENGINEER: BBS

CHECKED BY:



DAMES & MOORE

A DAMES & MOORE GROUP COMPANY

LOG OF BORING DM-8-99

FIGURE A-10.1

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189

FIELD ENGINEER: BBS CHECKED BY:

Sheet 2 of 2

PROJECT LOCATION: Everett, WA SAMPLE TYPE KEY: FINES CONTENT (%) DRY DENSITY (pcf) MOISTURE CONTENT (%) BLOWS PER FOOT Bag sample Relatively undisturbed sample ELEVATION(ft.) DEPTH (ft.) SAMPLE USCS Disturbed sample Sample attempt with no recovery SPT split spoon sample **DESCRIPTION REMARKS** 30-12 50/3" 113.1 14.3 35 50/6" >< Gray SILT with trace fine to medium sand and fine gravel ML (very stiff) 40 -27 45 36 90.2 Gray fine to medium SAND with some silt SM' (very dense)(wet) 50/-50/6" 18 End of Boring at 51.5 feet below ground surface Ground water encountered at 5 feet below ground surface NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons

DAMES & MOORE

A DAMES & MOORE GROUP COMPANY

LOG OF BORING DM-8-99

MONITORING WELL NO. DM-6-99

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett. WA WATER LEVEL: ¥0.00 ft CLIENT NAME: Port of Everett ELEVATION: +20.00 DATE STARTED: December 6, 1999 TOTAL DEPTH: 55.00 ft DATE COMPLETED: December 6, 1999 WEATHER Overcast, light rain DRILLING CONTRACTOR: Cascade Drilling FIELD ENGINEER: BBS DRILLER: Scott Kruger DRILLING METHOD: Hollow Stem Auger to Mud Rotary CHECKED BY: SAMPLING METHOD: D&M U, 300lb hammer, 30" drop SAMPLE TYPE KEY: MOISTURE CONTENT (%) BLOWS PER FOOT Relatively undisturbed sample Bag Sample DEPTH (ft.) FINES CONTENT (ELEVATION uscs DRY DENSITY (Disturbed sample Sample attempt with no recovery SPT split spoon sample WELL CONSTRUCTION DETAIL & REMARKS DÉSCRIPTION ELEVATION V+ -20.0 SM/ Blackish Brown fine sandy SIL Twith trace gravel (possible fill)(soft)(moist) ML Gray brown predium to fine SAND with trace to some silt and fine SM -15.0 5-15 99.8 25.3 (medium dense)(wet) Retroleum Ødor Detected in samples 1, 2 (0 - 10 feet below ground surface) PID = 0. 10.0 10 18 103.1 16.5 14 18 3.1 128.6 136 Q.O 18 25 18 14.3 90.8 14.3 ML Dark gray SILT with some fine sand (very stiff)(low plasticity) 10.0 NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons **MONITORING WELL DM-6-99** Bentonite grout DAMES & MOORE SYMI

Bentonite plug

Filter Pack

A DAMES & MOORE GROUP COMPANY

Well screen

Concrete plug

FIGURE A-8.1

FIELD ENGINEER: BBS

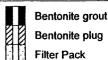
Sheet 2 of 2

PROJECT LOCATION: Everett, WA CHECKED BY: **SAMPLE TYPE KEY:** FINES CONTENT (%) DRY DENSITY (pcf) MOISTURE CONTENT (%) BLOWS PER FOOT SAMPLE TYPE ELEVATION(ft.) Relatively undisturbed sample Bag sample DEPTH (ft.) uscs Disturbed sample Sample attempt with no recovery SPT split spoon sample WELL CONSTRUCTION DETAIL & REMARKS **DESCRIPTION** ELEVATION -10.0 30 18 103,6 18.9 26 SM Brown medium SAND with some silt and trace gravel (very dense)(wet) 15.0 20.2 \$8 for 11 93.1 SP Gray brown medium SANQ with trace silt and fine gravel (very dense)(wet) -20.0 40 8 for 11 18 -25.00 -25.0 45 20.1 96 for 1 18 109.4 50 30.0 12 50 for 5 35.0` 55 12 50 for 5 K:\163\0-PROJEC\04333041.GPJ DMSEA6.GDT 27\00 Seattle, WA 9812 End of boring at 56 feet below ground surface Ground water encountered 6 feet below ground surface

AMES & MOORE A DAMES & MOORE GROUP COMPANY

WELL SYMBOL KEY:

NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons



MONITORING WELL DM-6-99 Well screen

Concrete plug

FIGURE A-8.2

APPENDIX B BORING LOGS

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA
CLIENT NAME: Port of Everett
DATE STARTED: September 25, 2000

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft

DATE COMPLETED: September 25, 2000
DRILLING CONTRACTOR: Cascade Drilling
DRILLER:

TOTAL DEPTH: 12.00 ft WEATHER:

DRILLING METHOD: Geoprobe

FIELD ENGINEER: T. Parkington CHECKED BY: M. McCabe

SA	AMPLI	NG M	ETHO	D: G	eopr	obe					
SAMPLER DRIVEN (in)	FINES CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE	ELEVATION (ft.)	ОЕРТН (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
					X	-18 - - - -13 -	0- - - - 5- -	GP PT SM		Asphaltic Concrete. Gravel subgrade Dark brown silty peat Black silty sand with some woody peat Brown sand with some silt. h.c. odor	PID = 3 ppm PID = 24 ppm PID = 2 ppm
					X	-8 -	- 10 - - -			Brown gray sand, wet. Boring completed at 12 feet. Backfilled with Bentonite. Ground water at 4 feet bgs.	PID = 0 ppm No odor
ECTNOBERGY ONSSERVICED ONSSERVICED TRANSCORPERING, WAS STATED					·						

NOTES:



LOG OF BORING UG-1

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000 DATE COMPLETED: September 25, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥3.00 ft

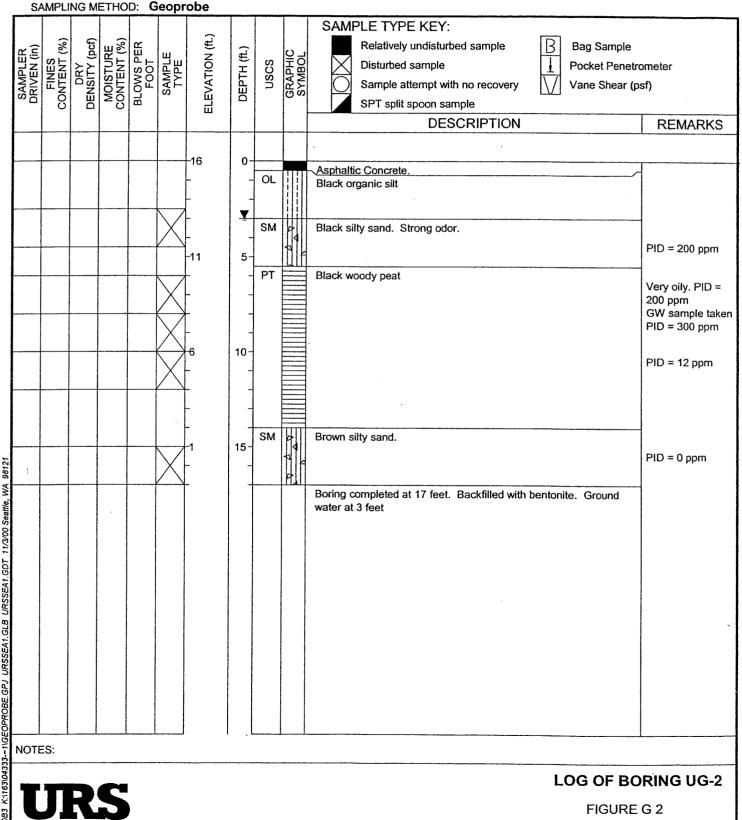
ELEVATION: 16 ft

TOTAL DEPTH: 17.00 ft

WEATHER:

FIELD ENGINEER: T. Parkington

CHECKED BY: M. McCabe



LOG OF BORING UG-2

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA WATER LEVEL: ¥5.00 ft CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000 ELEVATION: 18 ft DATE COMPLETED: September 25, 2000 TOTAL DEPTH: 14.50 ft DRILLING CONTRACTOR: Cascade Drilling WEATHER: FIELD ENGINEER: T. Parkington DRILLER: DRILLING METHOD: Geoprobe CHECKED BY: M. McCabe SAMPLING METHOD: Geoprobe SAMPLE TYPE KEY: MOISTURE CONTENT (%) DRY DENSITY (pcf) BLOWS PER FOOT ELEVATION (ft.) Relatively undisturbed sample Bag Sample SAMPLER DRIVEN (in) SAMPLE TYPE DEPTH (ft.) FINES CONTENT (uscs Disturbed sample Pocket Penetrometer Sample attempt with no recovery Vane Shear (psf) SPT split spoon sample **DESCRIPTION** REMARKS -18 Asphaltic Concrete. GP Gravel subgrade SM Gray brown silty sand PID = 0 ppm Red-tan silty sand PID = 0 ppmSM/ Brown silty sand / sandy silt with lenses of woody peat. PID = 1 ppm ML. 10 No evidence of hydrocarbons in water on rods Boring completed at 14.5 feet. Backfilled with bentonite. Groundwater at 5 feet bgs. NOTES: LOG OF BORING UG-3 FIGURE G 3

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000

ELEVATION: 20 ft TOTAL DEPTH: 14.50 ft

WATER LEVEL: ¥4.00 ft

DATE COMPLETED: September 25, 2000 DRILLING CONTRACTOR: Cascade Drilling

WEATHER:

FIELD ENGINEER: T. Parkington

DRILLER: DRILLING METHOD: Geoprobe CHECKED BY: M. McCabe SAMPLING METHOD: Geoprobe

SAMPLER DRIVEN (in)	FINES CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEPTH (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
						-20	0-	GP	.0	Gravel	
					X	- -	 	SM	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	Brown sand with some silt and gravel. No odor	PID = 0 ppm
					X	-15 - -	5- - -	ML SM	ø	Gray silt Brown sand with some silt	PID = 0 ppm
					X	- -10 - - -	- 10- - -	JIVI	20 20 20 20 20 00 00 00 00 00 00 00 00 0	BIOWIT SAIRG WILLT SOTTIE SITE	PID = 0 ppm
:										Boring completed at 14.5 feet. Backfilled with bentonite. Groundwater at 4 feet.	
						,					

NOTES:

LOG OF BORING UG-4

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000 DATE COMPLETED: September 25, 2000 DRILLING CONTRACTOR: Cascade Drilling DRILLER: DRILLING METHOD: Geoprobe

WATER LEVEL: ¥6.00 ft

ELEVATION: 19 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

				D: G	eopi					CHECKED BY: M.	
SAMPLER DRIVEN (in)	CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEPTH (ft.)	SOSU	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
						19	0-	GP	. o .	Gravel	I
					X	-14	5-	SM	9 2 2 4 2 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	Brown silty sand with trace gravel. No odor.	PID = 0 ppm
						_	- <u>-</u>	SM		Gray silty sand Dark brown silty sand with trace gravel and wood fragments.	- PID = 0 ppm
				-	X	- 9 -	10- -	Sivi	2 2 4 2 4 5 4 5 4 5 5 5 5 5 5 5 5 5 5 5	Dark brown sitty sand with trace graver and wood tragments.	PID = 0 ppm
									11,14	End of boring at 12 feet. Backfilled with bentonite. Ground water at 6 feet bgs.	

NOTES	3 :										

LOG OF BORING UG-5

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett
DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000
DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe SAMPLING METHOD: Geoprobe

WATER LEVEL: ¥5.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

LOG OF BORING UG-6

SAMPL	NG M	THO	D: G	eopr	obe	,				
SAMPLEK DRIVEN (in) FINES CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEPTH (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
					-18 -	0-	SM/ GM	2,00	Brown silty gravel and sand .	
				X	- -13 -	- - 3	SM	5 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Gray silty sand, some gravel. No odor. Traces of brown color	PID = 0 ppm PID = 0 ppm
				X	8	- - 10-	SP		Some wood fragments. Brown sand, silt and gravel.	PID = 0 ppm
				X		-			End of boring at 12 feet. Backfilled with bentonite. Ground water at 5 feet bgs.	
							·		· · · · · · · · · · · · · · · · · · ·	
NOTES:]					

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett. WA CLIENT NAME: Port of Everett DATE STARTED: September 26, 2000 DATE COMPLETED: September 26, 2000 DRILLING CONTRACTOR: Cascade Drilling DRILLER: DRILLING METHOD: Geoprobe SAMPLING METHOD: Geoprobe DRY DENSITY (pcf) FINES CONTENT (%) MOISTURE CONTENT (%) ELEVATION (ft.) BLOWS PER FOOT DEPTH (ft.) SAMPLE TYPE USCS 16 0 SM

WATER LEVEL: ¥2.00 ft

ELEVATION: 16 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

SAMPLE TYPE KEY: Relatively undisturbed sample Bag Sample Pocket Penetrometer Disturbed sample Vane Shear (psf) Sample attempt with no recovery SPT split spoon sample **DESCRIPTION** REMARKS Asphaltic Concrete. PID = 0 ppmDark brown to gray silty sand with some gravel PID = 0 ppmSome wood fragments PID = 0 ppmDark brown sand with some silt and gravel. PID = 0 ppmEnd of boring at 12 feet. Backfilled with bentonite. Groundwater at 2 feet bgs. DB3 KN163104333-11GEOPROBE.GPJ URSSEA1.GLB URSSEA1.GDT 11/3/00 Seattle, WA 98121

NOTES:

LOG OF BORING UG-7

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥4.00 ft

ELEVATION: 17 ft

TOTAL DEPTH: 19.50 ft WEATHER:

FIELD ENGINEER: B. Strickler CHECKED BY: M. McCabe

SAMPLING METHOD: Geoprobe SAMPLE TYPE KEY: MOISTURE CONTENT (%) FINES CONTENT (%) ELEVATION (ft.) DENSITY (pcf) BLOWS PER FOOT Relatively undisturbed sample Bag Sample SAMPLER DRIVEN (in) DEPTH (ft.) SAMPLE TYPE uscs Disturbed sample Pocket Penetrometer Vane Shear (psf) Sample attempt with no recovery SPT split spoon sample DESCRIPTION REMARKS GP Gravel SM Gray silty sand with some gravel PID = 186 ppm SM Dark brown to black silty sand with some gravel and wood fragmenst. Strong odor. 5 PID = 180 ppm Strong odor SM Gray silty sand with some gravel Black silty sand with some wood fragments. Strong odor PID = 105 ppmBlack woody peat, strong odor. 10 PID = 5 ppmColor grades to red with no odor. 364.4 PID = 0 ppmBrown sand with some silt and gravel. Faint odor 15-PID = 0 ppmNo odor. End of boring at 19.5 feet. Backfilled with bentonite. Gound water at 4 feet bgs.

URSSEA1.GLB

NOTES:

LOG OF BORING UG-8

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA
CLIENT NAME: Port of Everett

DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000 DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 17.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

SAMPLING ME						GREGRED B1. III.	ouse
SAMPLER DRIVEN (in) FINES CONTENT (%) DRY DENSITY (pcf)	MOISTURE CONTENT (%) BLOWS PER FOOT	SAMPLE TYPE TYPE ELEVATION (ft.)	DЕРТН (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
		18	0- - - <u>▼</u> 5-	GP SM	1	Gravel Gray silty sand with some gravel. Strong odor.	PID = 430 ppm
		8	10-	PT	7 4	Strong odor. Woody peat. Strong odor. Strong odor.	PID = 175 ppm PID = 200 ppm PID = 375 ppm
	827.4	3	15-	SP		Brown sand with trace silt and some gravel. Some odor. No odor	PID = 0 ppm
						End of boring at 17 feet. Backfill with bentonite. Groundwater at 4 feet bgs.	
OTES:							

NOTES:

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LOG OF BORING UG-9

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett
DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥3.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

LOG OF BORING UG-10

SAMPLING METHO			CHECKED B1. WI.	
SAMPLER DRIVEN (in) FINES CONTENT (%) DRY DENSITY (pcf) MOISTURE CONTENT (%)	BLOWS PER FOOT SAMPLE TYPE ELEVATION (ft.)	DEPTH (ft.) USCS GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION Bag Sample Pocket Penetr Vane Shear (p	
	18	O GP O	Gravel	T
	13	SP	Brown to dark brown sand with some to trace silt and gravel. No odor.	PID = 0 ppm
	8	10-		PID = 0 ppm
			End of boring at 12 feet. Backfilled with Bentonite. Groundwater at 3 feet bgs.	
NOTES:	· · · · · · · · · · · · · · · · · · ·	<u> </u>		

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189

PROJECT LOCATION: Everett, WA
CLIENT NAME: Port of Everett

DATE STARTED: September 26, 2000
DATE COMPLETED: September 26, 2000
DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

SAMPLER DRIVEN (in)	FINES CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEРТН (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample	
	_									DESCRIPTION	REMARKS
						18	0-	GP	.0.	Gravel.	
						-		SP). D	Brown to gray sand with some to trace silt and gravel. Faint odor.	
								or.		DIOWIT to gray Saild with Some to trace six and graver. I amit odos.	PID ≈ 0 ppm
					X	_	<u>*</u>				
						-13	5-			No odor	PID = 0 ppm
					X	_	-			NO Odol	ID = 0 ppiii
						_	-				DID . O
					X	-	-				PID = 0 ppm
						-8	10-				
					\bigvee	-	'-			•	PID = 0 ppm
			_		\angle	_	-			End of boring at 12 feet. Backfilled with bentonite. Groundwater	
										at 4 feet bgs.	
										·	
1											
										•	
							-				
						1		1	1		

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LOG OF BORING UG-11

PROJECT: California Street Overcrossing

PROJECT NO: **04333-041-189**PROJECT LOCATION: **Everett, WA**

CLIENT NAME: Port of Everett
DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000
DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

SAMPLING METHOD: Geoprobe	
	mple Penetrometer near (psf) REMARKS
SP Brown sand with trace silt and gravel. No odor.	PID = 0 ppm
Some wood fragments.	PID = 0 ppm PID = 0 ppm
8 10 Woody peat	PID = 0 ppm
SP Sown sand with trace silt and gravel. End of boring at 12 feet. Groundwater at 4 feet bgs. Backfille with bentonite.	ed
OTES:	

URS

LOG OF BORING UG-12

SOIL BORING AND WELL INSTALLATION DATA SHEET Boring ID: JP-1/JP-1a

Project Information Page 1 of 1

Project Name:	California Street Overcro	ossing		Location: California	St and Federal Ave				
Project/Task No.:	53-04333041.00 00056			Weather: sunny, 60F	sunny, 60F				
Drilling Information									
Date Started:	Thursday, June 21, 2001			Annulus Diameter:	2 inches				
Date Completed:	Thursday, June 21, 2001			Hammer Weight and Drop.	p: NA lbs and NA inches				
Drilled By:	Kasey Goble	of	Cascade Drilling	Sampler Type:	3' stainless steel split spoon				
Logged By:	Kate Pineo	of	URS	Approximate Surface Elevi	vation: NA feet				
Checked By:	Dave Raubvogel	of	URS	Groundwater Level:	4 below ground surface				
Drilling Method:	Direct Push			Total Depth:	13 below ground surface				
Drill Rig Type:	Truck-mounted GeoProb	e		Backfill Material:	bentonite chips, asphalt patch				
Well Installation Data									
Type of Well Casing:	NA			Top of PVC Elevation:	NA				
Screen Perforation:	NA			Type/Thickenss of Seals:	NA				
Diameter of Well:	NA			Type of Sand Pack: NA					
Screened Interval:	NA								

	Depth (feet)	Blows per 6 inches	Penetration/ Recovery (inches)	Time	USCS Classification	USCS Graphic	Material Description	Well Completion Diagram	PID Readings (ppm)	Samples	Remarks
	0						Asphalt, gravel road base.				
	2 3		36/24				Gray to brown Silt and fine Sand, some very angular fine Gravel, dry. Gray medium to coarse sand, mottled, moist.		16.1	JP1/1.5-4.5	Began sampling at 1.5'.
	4		36/27	8:15	ML SM		Gray Silt and Clay, wood debris, moist. Grading brown. Brown fine Sand and Silt, wet.		45	JP1/4.5-7.5	
1	5				ML		Brown Silt and Clay, wet.				
	7		36/36	8:30	SM		Brown Sand and Silt with silty clay interbeds, grading black.		15	Љ1/Л.5-10	
	9		36/12	8:45	SP		Brown medium to coarse Sand, medium soft, mottled, wet.		5		Refusal at 10' bgs. Moved 6.5' west and sampled 10 - 13'.
1	11 12										west and sampled 10 - 13.
	13						BORING COMPLETED AT 13'				,
	15										
	16										
	18 19										
L	20										

~	TI	
w	11	-3.

Groundwater level measured down-hole with water level indicator.

PID screening on black soil at 10' bgs = 14 ppm.

Sampled groundwater JP1/GW at 8:30. Slow recharge, very clear water.

Slight organic odor in 10 - 13' sample. Not collected for analysis.

SOIL BORING AND WELL INSTALLATION DATA SHEET Boring ID: JP-2 Project Information Page 1 of 1 roject Name: California Street Overcrossing Location: California St and Federal Ave Project/Task No.: 53-04333041.00 00056 Weather: sunny, 60F **Drilling Information** Date Started: Thursday, June 21, 2001 Annulus Diameter: 2 inches Date Completed: Thursday, June 21, 2001 Hammer Weight and Drop: NA lbs and NA inches Drilled By: of Kasey Goble Cascade Drilling Sampler Type: 3' stainless steel split spoon Logged By: Kate Pineo URS Approximate Surface Elevation: NA fect Checked By: Dave Raubvogel URS Groundwater Level: 2.3 below ground surface Orilling Method: Direct Push Total Depth: 6 below ground surface Drill Rig Type: Truck-mounted GeoProbe Backfill Material: bentonite chips Well Installation Data Type of Well Casing: NA Top of PVC Elevation: NA creen Perforation: NA Type/Thickenss of Seals: NA Diameter of Well: NA Type of Sand Pack: NA Screened Interval: NA PID Readings (ppm) Blows per 6 inches Penetration/ Recovery (inches) Well Completion Diagram Samples Remarks 9:15 Brown Silt and Clay, some fine Gravel, dry. JP2/0-3 Fine Sand and Silt, some fine Gravel, wet. 0 JP2/3-6 36/24 9:15 Grading brown fine to coarse Sand and fine Gravel, some Silt. Grading brown-gray fine Sand and Silt, some fine to coarse Gravel. Black fine Sand, saturated. BORING COMPLETED AT 6'

NOTES:

Groundwater level measured down-hole with water level indicator.

SOIL BORING AND WELL INSTALLATION DATA SHEET Roring ID: ID 2

Proj	ect Inform	mation										Page 1 of 1
Proje	ect Name:		Califor	nia Stree	t Overcro	ssing	Location:	California	St and Fed	eral Ave	· · · · · · · · · · · · · · · · · · ·	- 4,60 1 00 1
Proje	ect/Task N	lo.:	53-043	33041.00	00056		Weather:	sunny, 60		· - · · · ·		
_	ing Infor	mation										
l	Started: Complete	d.		ay, June : ay, June :			Annulus Dian			2	inches	
	ed By:	u.	Kasey (21, 2001	of Cascade Drilling	Hammer Weig Sampler Type		p:	NA 21	lbs and	NA inches
	ed By:		Kate Pi			of URS	Approximate:		vation-) staintess NA	steel split spoo	on
	ked By:			aubvogel		of URS	Groundwater i		ration.	2.5	below ground	surface
Drilli	ing Metho	d:	Direct I	Push			Total Depth:			6	below ground	
Drill	Rig Type:		Truck-r	nounted	GeoProbe		Backfill Mater	rial:		bentonite o	•	
Well	Installati	on Data										
	of Well C		NA				Top of PVC E	launtian		N/ A		
	n Perforat	-	NA NA				Type/Thickens			NA NA		
Diam	eter of W	ell:	NA				Type of Sand I			NA	· · · · · · · · · · · · · · · · · · ·	
Scree	ned Interv	al:	NA	<u> </u>								
				5	1				1	· ·	1	
Depth (feet)	ber 6	Penetration/ Recovery (inches)		USCS Classification					Well Completion Diagram	PID Readings (ppm)		
cpth	Blows per inches	enetr ecov nche	i iii	SCS	USCS Graphic				omple	JE C		
9	ø.5	36/30	10:00	GP		Material Description Brown fine to medium Sand and fine Gravel, dry.			≥00	8.5	Samples JP3/0-3	Remarks
				ML		Brown-gray Silt and Clay, some fine Gravel, damp.					51.51.0.5	
						brown-gray 3m and Clay, some fine Graver, damp.						
1												
2												
3		36/36	10:00	SM		Brown fine Sand and Silt, wet.				6	JP3/3-6	
												,
4												
١						·						
5												
1		· I										·
1	į											
6						BORING COMPLETED AT	6'.					
7												
ı	1											
ı	l											
8	-											
- 1	- 1							•				
9			1		I							
			I		1	•						
\perp												
OTE	S:											
		el measured d	own-hole	with wa	ter level i	ndicator.						<u> </u>
												1
												1
												1

SOIL BORING AND WELL INSTALLATION DATA SHEET
Boring ID: JP-4

Pro	ject Infor	mation											Page 1 of
Proj	ect Name:	:	Califor	nia Stree	t Overcro	ossing	Location:	California	a St and Fed	ieral Ave			
Proj	ect/Task l	No.:	53-043	33041.00	0 00056		Weather:	sunny, 60	F				
D. "											· · · · · · · · · · · · · · · · · · ·		
	ling Infor	mation	Th		31, 2001								
ł	: Starteu: : Complete	ed:		ay, June			Annulus Dia			2	inches		
1	led By:		Kasey		21, 2001	of Cascade Drilling	Hammer Wei Sampler Type		р:	NA 3' stainless	_lbs and steel split spo	NA_	inches
Log	ged By:		Kate Pi			of URS	Approximate		vation:	NA NA	feet	041	
Chec	ked By:		Dave R	aubvogel	1	of URS	Groundwater			2	below ground	surface	
,	ing Metho		Direct 1	Push			Total Depth:			10	below ground	surface	
Drill	Rig Type	:	Truck-i	nounted	GeoProb	e	Backfill Mate	rial:		bentonite o	hips		
Well	Installati	ion Data											
Турс	of Well C	asing:	NA				Top of PVC I	Elevation:		NA			
Scree	en Perfora	tion:	NA				Type/Thicken	iss of Seals:		NA			
1	neter of W		NA				Type of Sand	Pack:		NA			
Scree	ened Inter	val:	NA										
۵	9	<u>ş</u>		u O					_	SS			
ĵ.	S per	tratio very		ficat	. 9				letio	eadin			
Depth (feet)	Blows per inches	Penetration/ Recovery (inches)	line i	USCS Classification	USCS Graphic	Material Description			Well Completion Diagram	PID Readings (ppm)	Samples		.
0		36/24	10:30	GP		Brown-gray fine Sand and Gravel, dry				280 - 300	JP4/0-3	Odor.	Remarks
				SM		Gray fine Sand and Silt, some fine Gravel, dark gray	ash/sinder laye	r, dry.					
1													
												ļ	
			1									1	
2													
						Grading brown fine Sand and Silt, little coarse Grave	i.					-	
3		36/12	10:45	SP		Brown fine to coarse SAND, little coarse Gravel, we				270	JP4/3-6	Odor.	
				-		or we have so come of a very mile come of a very well	•			270	JF4/3-0	Odor.	
4													
5													
]	
6						No sample collected.				I			
	1												
7										l			
		l											
.		215											
8	I	24/7	10:50	SM		Gray medium Sand and Silt, wet. Red-brown wood d	ebris noted.		.	5.3	JP4/8-10	İ	
- 1	l									1			
9	l							- 1	1	ľ			
								1		- 1			
						BORING COMPLETED AT	0'.		l				
NOTE													
		el measured o nple JP4/GW				indicator.							
or our	swater san	.p.c 31 4/01/	conceica	21 10.50	•								

SOIL BORING AND WELL INSTALLATION DATA SHEET

										E	Boring ID:	JP-5
Project Info	rmation											Page 1 of
Ргојест Nam	e:	Califor	nia Street	(Overcro	ossing	Location:	California	St and Fede	eral Ave			
Project/Task	No.:	53-043	33041.00	00056		Weather	sunny, 60F	F				
Drilling Info					· · · · · · · · · · · · · · · · · · ·							
Date Started:			ay, June 2			Annulus Diar			2	inches	N/A :	
Date Comple Drilled By:	ied:		ay, June 2 Goble	11, 2001	of Cascade Drilling	Hammer Wei Sampler Type	ight and Drop	r.	NA 3' stainless	_lbs and s steel split spoon		ches
Logged By:		Kasey C Kate Pir			of URS	• • • • • • • • • • • • • • • • • • • •	e: e Surface Elev	ration-		feet split spoon		
Checked By:			laubvogel	1	of URS	Groundwater		divii.	2	below ground s	surface	
Drilling Meth		Direct P				Total Depth:			6	below ground s		
Drill Rig Typ			mounted C	GeoProb	e	Backfill Mate			bentonite c	-		
*** ** *4_11	· P-4-											
Well Installa Type of Well		NA				Top of PVC I	Flevation:		NA			
Screen Perfor		NA NA				Type/Thicker			NA NA			 .
Diameter of V		NA				Type of Sand			NA			
Screened Inte		NA						97				
					T							
g gg	Penetration/ Recovery (inches)		USCS Classification					Well Completion Diagram	PID Readings (ppm)			
Depth (feet) Blows per 6 inches	netral cover ches)	g	USCS Classific	USCS Graphic			1	il mple	PID Rea (ppm)	'	1	
Blo Det	2 % E			135				≱ರಿದ		Samples	Rema	rks
١	36/36	11:05	SM		Light gray fine Sand and Silt, some coarse Gravel, d	iry.			4.3	JP5/0-3		
	1		1 '						1 1	!		
1			ML		Dark gray SILT and coarse Gravel				1	'		
	36/22	11:10	SM	####	Brown dense fine Sand and Silt, wet, grading gray.			!	1.5	1 1		
					DIOWE COURS INC. ONLY 11-14 BELLING &-7.							
2		'	1 '		ı İ				ı 1			
			1 '						, 1			
3		1	1 1		Grading brown		ļ		5.3	JP5/3-6	ĺ	
		'	1 '						, 1	-1		
		'	1. 1		,				, 1	1		
4		'	1 1				ļ		!		ĺ	
1			'						. !		İ	
5	1		1						, !		ĺ	
1									, !	.	ĺ	
			SP		Black fine to medium Sand and Gravel.						ĺ	
6		'			BORING COMPLETED AT	Г 6'.						
		'	1 1				ļ		, !		ĺ	
7		'	1 1				l			1 1		
·		'	[]	ĺ			ļ		, ,	1 1	l	
		!	1				l		, ,	i 1		
8	1	!	1 1						, !	1 1	ĺ	
	1		1 1						, 1		1	
9			1 1				1		. !	1	1	
1			1 1								l	
			1 1						, !	1	ĺ	
		<u></u>					1	<u> </u>		L		
NOTES:	level measured	מל-חשום ל	le with w	ater leve	d indicator	·						
JOURIUWAIC.	SVCI HEADuica	gown-no.	5 With wa	KCL ICACT	indicator.							
		•										

SOIL BORING AND WELL INSTALLATION DATA SHEET

Pro	ect Infor													Boring ID:	JP-6
_	ect Name:		Califor	nia Steen									···		Page 1 of
•	ect/Task N			nia Stree 33041.00		essing			Location: Weather:		ia St and Fed	leral Ave			
									- Weather.	sunny, 60	UF				
Dril	ling Infor	mation													
Date	Started:		Thursd	ay, June 1	21, 2001				Annulus I	Diameter:		2	inches		
	Complete	:d:		ay, June 2	21, 2001			····	Hammer \	Weight and Dro	op:	NA	_lbs and	NA inch	es
	ed By: ged By:		Kasey (of of	Cascade Dr	illing	_ Sampler T				steel split spoo	on	
	ked By:		Kate Pi	neo aubvogel		— of of	URS		_	rate Surface Ele	evation:	NA_	_feet		
	ing Metho	d:	Direct I		<u> </u>	_ "	OKS	· · · · · · · · · · · · · · · · · · ·	_ Total Dep	ater Level:		9	_below ground below ground		
Drill	Rig Type:	:	Truck-n	nounted (GeoProb				Backfill M			bentonite :	-	Jul Tucc	
337-11	T4-11-4	D. 4-													
	Installati of Well C		NA			····									
	n Perfora		NA NA						-	C Elevation: kenss of Seals:		NA NA	· · · · · · · · · · · · · · · · · · ·		
Dian	eter of W	ell:	NA						Type of Sa			NA			
Scree	ned Interv	val:	NA												
Ė		Ι,	T	- E	Т	I				· · · · · · · · · · · · · · · · · · ·	1	1 10	т	T	
Depth (fect)	per 6	Penetration/ Recovery (inches)		USCS Classification	و						Well Completion Diagram	PID Readings (ppm)			
e pt	Blows per inches	Seco.	Time	SCS lassi	USCS Graphic	·		Mar. 2.18			/ell ompl	E E	Samples		
0	- Pi - Pi	36/24	11:50	SM	ΙΪΪ	Gray-brown fit	e Sand and S	Material Descrip ilt, some coarse G	ravel, mottled, dry	<i>'</i> .	1200	4.3	JP5/0-3	Remark	<u>s</u>
1															
2															
3		36/6	11:50			Grading wet.						14		Poor recovery.	
4															
l															
5															
6		36/18	11:50			Grading peat no	ted.					1.5	JP5/6-9		
7	l			.											
	l					i									
8				1											
	l														•
9			ľ		1,11,11		BOR	ING COMPLETE	D AT 9'.		1 (
	- 1													·	
1									· · · · · · · · · · · · · · · · · · ·	.	<u> </u>				
OTE															
iround	iwater lev	el measured o	iown-hole	with wa	ter level	indicator.									
								•							

SOIL BORING AND WELL INSTALLATION DATA SHEET Boring ID: _____ JP-7

Project Information			Page 1 of
Project Name:	California Street Overcrossing	Location:	California St and Federal Ave
Project/Task No.:	53-04333041.00 00056	Weather:	sunny, 60F

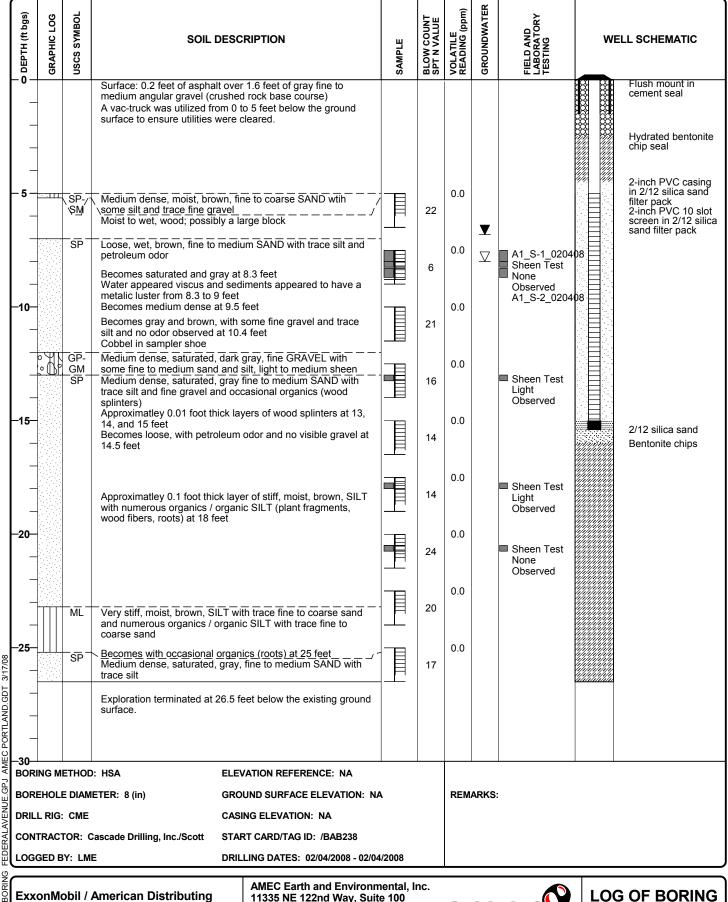
Proposed Table No. 23-04333041 80 00056	,											rage I of
Deliting Information Diase Stances: Thursday, June 21, 1201	Project Name	: :	Califor	nia Stree	t Overcro	ssing	Location:	California	St and Fed	leral Ave		
Date Surveit: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter 2001 Annulus	Project/Task	No.:	53-043	33041.00	00056		Weather:	sunny, 60I				
Date Surveit: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter: Thursday, June 21, 2001 Annulus Diameter 2001 Annulus								-				
Date Completed: Thursday_June 21, 200				-								
Delited By: Lorged By:											-	
Lorged By: Rise Pines O URS Approximate Surface Elevation: NA Feet	-	ted:			21, 2001				:		-	
Dave Randword Dave Randword Dave Randword Dave Randword Dave Randword Dave Public Deliver Publ												on
Driving Method: Drive Push Total Depol: Backfill Material: 9 below ground surface									ation:		-	
Delit Right Type: Truck-mounted GeoProble Backfill Material: Delitabilistion Data					1	ORS .		Level:			-	
Well Installation Data Type of Well Casing: NA Top of FVC Elevation: NA Type of Sand Pack: NA Type of Sand Pack: NA Type of Sand Pack: NA Type of Sand Pack: NA Type of Sand Pack: NA Type of Sand Pack: NA NA NA Material Description 1 Sand and Silt, some fine Gravel, day: 2 SP SP SP Brown fine to medium Sand, little coarse Gravel, wet: 3 3673 3674 1220 Grading brown fine to medium Sand. 9 JF7/6-9 Remarks					GeoProbe			rial·			-	surrace
Type of Well Casing: NA							Dackin Mac			- CHOIRE	шрэ	
Screen Perforation: NA NA NA NA NA NA NA NA NA NA NA NA NA	Well Installa	tion Data										
Diameter of Well: NA Type of Sand Pack: NA Type of Sand Pack: NA Ty	Type of Well	Casing:	NA				Top of PVC E	Elevation:		NA		
Semental Interval: NA	Screen Perfor	ation:	NA				Type/Thicken	ss of Seals:		NA .		
1 1 1 1 1 1 1 1 1 1	Diameter of V	Vell:	NA				Type of Sand	Pack:		NA		
SM	Screened Inte	rval:	NA									
SM		Т.	Т		1	I .			· · · · ·	·	T	T
SM	feet)	gi çi 🤇	1	catio	1				tion I	ding	l	
SM	be w hes	netra cove	9	Sign	CS		•		ag ag	8 €		
Carding dark gray. 75 17/1-2 20 17/2-3 17/2-3 20 20 17/2-3 20 20 20 20 20 20 20 2	g mi	5 2 2 5	↓ Ĕ		35				≱ರಿದೆ	H G	Samples	
Grading dark gray. 20	<u> </u>	20/30		SM.		Light brown fine Sand and Silt, some fine Gravel, dry	1.			1		Odor.
SP Brown fine to medium Sand, little coarse Gravel, wet. No recovery. SP Brown fine to medium Sand, little coarse Gravel, wet. No recovery. SP PRINT SAND SAND SAND SAND SAND SAND SAND SAND				Ì						75	JP7/1-2	
SP Brown fine to medium Sand, little coarse Gravel, wet. No recovery. SP Brown fine to medium Sand, little coarse Gravel, wet. No recovery. SP PRINT SAND SAND SAND SAND SAND SAND SAND SAND	1					Grading dark gray.				20	JP7/2-3	
3 36/0 No recovery. Solution of the state	1			1								
3 36/0 No recovery. Solution of the state	ı											
4 36/24 12:20 Grading brown fine to medium Sand. 9 JP7/6-9 7 8	2			SP		Brown fine to medium Sand, little coarse Gravel, wet	•					
4 36/24 12:20 Grading brown fine to medium Sand. 9 JP7/6-9 7 8												
4 36/24 12:20 Grading brown fine to medium Sand. 9 JP7/6-9 7 8		340		1								
5 36/24 12:20 Grading brown fine to medium Sand. 9 JP7/6-9 8	3	36/0				·						No recovery.
5 36/24 12:20 Grading brown fine to medium Sand. 9 JP7/6-9 8				}						,		
6 36/24 12:20 Grading brown fine to medium Sand. 9 JP7/6-9 8	4				90					1	ļ	
6 36/24 12:20 Grading brown fine to medium Sand. 9 JP7/6-9 8	- 1	l								1		·
6 36/24 12:20 Grading brown fine to medium Sand. 9 JP7/6-9 8	- 1											
8	5	1									l	
8	ł		1									
8												
	6	36/24	12:20			Grading brown fine to medium Sand.				9	JP7/6-9	
		Ì	1									
	,		1							İ		
		1										
9 BORING COMPLETED AT 9'.	8											
9 BORING COMPLETED AT 9'.												
9 BORING COMPLETED AT 9'.												
	9					BORING COMPLETED AT	9'.					
				1								

NOTES:			
Groundwater level measured down-hole with water level indicator.			
Groundwater sample JP7/GW collected at 12:20.			
i			

- EN	Project No.: 31174 Boring: MW20 Plate: 1 OF 1 Site: Former Mobil Oil Terminal 46-108 Date: 07/03/02	
ENVIRONMENTAL RESOLUTIONS, INC.	Drill Contractor: Cascade Drilling, Inc. of Woodinville, WA	
Sample Method: None		
Drill Rig: CME-55	Bore Hole Diameter: <u>8"</u> Signature: ner of property Registration:	
in gravel next	to Federal Avenue. Logged by: Antonio Luna	
(A) / / / /		
	GEOLOGIC DESCRIPTION	
	Removed steel well and point, backfilled with bentonite, capped with 1 foot of cement	
	capped with I look of tement	
-5-	Total depth, 5 feet below ground surface	
		A
		N
		ut:
		Grout:
		;
		Ā
		Z
		ii
		Size:
		Sand
		Sa
		أر
		N/A
		1
		Size:
		Slot
		$\mathbf{\Omega}$
		أر
		N/A
		eter
		Diameter:
		Casing
		Çaş
FN: 31174B0020		

Project No.: 31174 Boring: MW21	Plate: 1 OF 1					
Site: Former Mobil Oil Terminal 46-108	Date: <u>07/03/02</u>					
Dim Contractor.						
Sample Method: None Geologis Drill Rig: CME-55 Bore Hole Diameter: 10" Signatur	t: Antonio Luna					
Location: Southwest corner of property Registra	tion:					
in gravel next to Federal Avenue. Logged	by: Antonio Luna					
GEOLOGIC DESCRIPTI	ON REPRET					
	V·/·/·/·/·/					
Removed schedule 40 PVC well casing overdrilled to remove seal and sand	g, pack,					
backfilled with bentonite,						
capped with 1 foot of cement	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
-5-						
Total depth, 6 feet below ground sur	face					
Total depth, 6 leet below ground sur	Tace					
	A					
	N					
	lt:					
	Grout:					
	N/N					
	Size:					
	i i					
	Sand					
	, w					
	N/A					
	Size:					
	Slot					
	 					
	Z					
];					
	lete					
	Diameter:					
	i i					
	Casing					
	Cas					
FN: 31174B0021						

- ERI	Project No.: 31174 Boring: Unknown Plate: 1 Site: Former Mobil Oil Terminal 46-108 Date:						
ENVRONMENTAL RESOLUTIONS, INC.	Drill Contractor: Cascade Drilling, Inc. of Woodinville, WA						
	Sample Method: None Geologist: Antonio Luna						
Drill Rig: CME-55	Bore Hole Diameter:10" Signature:						
Location: Southwest cor	ner of property Registration: to Federal Avenue. Logged by: Antonio Lu	ına					
$\sqrt{2}$							
	GEOLOGIC DESCRIPTION	AND REST					
	Well overdrilled to remove well casing, seal, and sand pack, backfilled with bentonite, capped with 1 foot of cement						
-5-							
	Total depth, 6 feet below ground surface						
		Grout: N/A					
) j					
		N/A					
		Size:					
		Sand S					
		N/A,					
] 1					
		Size:					
		Slot					
		<u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u>					
		j					
		N/A					
		Diameter:					
		n gr					
		Casing					
FN: 31174B0unk	L						



ExxonMobil / American Distributing Company

7-915-15716-B

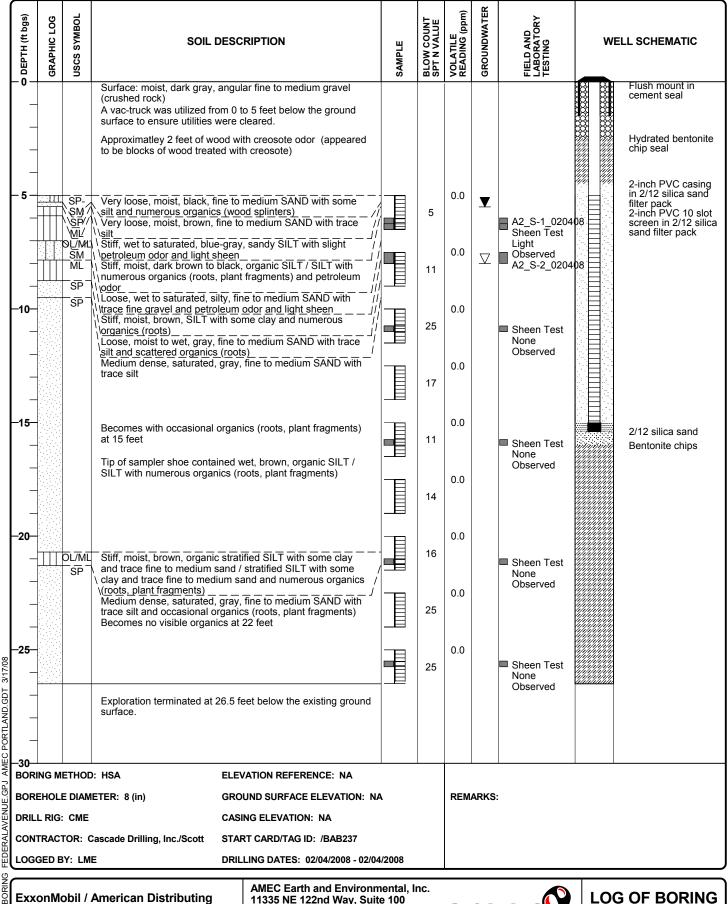
AMEC Earth and Environmental, Inc. 11335 NE 122nd Way, Suite 100 Kirkland, Washington USA 98034 Tel (425) 820-4669

Fax (425) 821-3914



LOG OF BORING MWA1

PAGE 1 OF 1



ExxonMobil / American Distributing Company

7-915-15716-B

AMEC Earth and Environmental, Inc. 11335 NE 122nd Way, Suite 100 Kirkland, Washington USA 98034 Tel (425) 820-4669

Fax (425) 821-3914



LOG OF BORING MWA2

PAGE 1 OF 1

APPENDIX D

PEG Report (Kimberly-Clark Investigations)



Texaco Refining and Marketing Inc

3400 188th Street SW Suite 630 Lynnwood WA 98037

JUN 02 1998

April 20, 1998

DEPT. OF ECOLOGY

Recured by

Media a8

Subsurface Investigation Results
Port of Everett – Former Bulk Facilities
2600 Federal Avenue, Everett, Washington

Bellevue, Washington 98008-5452

Mr. Norm Peck
Washington Department of Ecology Northwest Region
Toxic Cleanup Program
Mail Stop NB-81
3190 - 160th Avenue SE

Dear Mr. Peck:

Enclosed is a copy of a Environmental Investigation Report for the above-referenced location. The report was prepared by Pacific Environmental Group (PEG) on behalf of Chevron Products Company, Texaco Refining and Marketing, Kimberly-Clark, and Burlington Northern Railroad. The work was conducted in response to Ecology's concern that petroleum bulk distribution facilities formerly located at the site had contributed to the free phase hydrocarbons (free product) identified in a City of Everett Combined Sewer Outfall (CSO Line) located between the subject site and the Mobil/American Distributing facilities to the south.

During June and July 1996, approximately 23,000 gallons of free product (identified as fuel oil) were recovered by others during excavation of the CSO Line. Extensive free product contamination had previously been identified at the Mobil/American Distributing facility. Mobil subsequently conducted a historical investigation of potential off-site sources of petroleum hydrocarbons, and former Standard Oil and Tidewater Oil bulk distribution facilities, located north of the CSO line were identified. Ecology identified Potentially Liable Parties (PLPs) associated with the former facilities and proposed an Agreed Order requiring an investigation to determine whether impacts from the former bulk facilities were contributing to the CSO Line problem.

Four of the PLPs, Chevron, Texaco, Kimberly-Clark, and Burlington Northern/Santa Fe Railroad, decided to conduct an investigation of the former terminals as an independent action in order to expedite the process. The investigation consisted of advancing 15 soil probes and collecting grab samples of groundwater, and installing and sampling two permanent groundwater monitoring wells. The results of the investigation are presented in the enclosed report.

No free product was observed during this investigation. In fact, the only significant dissolved hydrocarbon concentrations identified were in the two probes located adjacent to the CSO Line. Based on the results of this investigation, we believe that it is impossible to conclude that the free product found in the CSO Line is the result of operations at the former Chevron and Tidewater properties, now owned by Kimberley Clark.

Mr. Norm Peck April 20, 1998 Page 2

Additionally, fuel fingerprinting analysis, conducted during the CSO Line repairs, showed a strong correlation between the fuel oil from the CSO Line and the free product recovered from wells at the Mobil/American Distributing site. Based on these results, we believe that there is no reason to maintain any link between the former bulk plants and the Mobil/American Distributing/CSO problem. Further, we see no reason to conduct additional investigation. Please feel free to contact me at (206) 774-6090 extension 227 if you have any questions regarding this report.

Sincerely

Tony Palagyi Project Manager

Texaco EH&S

Ann Marie Johnson

Project Manager

Chevron Products Company

Richard C. Abrams

Environmental Manager

Kimberly Clark

Bruce Sheppard

Manager Env. Remediation

Burlington Northern/Santa Fe

- Soil Borings were very

Shallow perhaps too Shallow

Considering fill history

- well screening size may

have been too fight to allow

Environmental viscous fluids to collect.

Investigation Report

may not be acceptable to

Former Bulk Fuel Facilities

WHOE, Norm Reck.

2600 Federal Avenue

Prepared for

Everett, Washington

Chevron Products Company, Texaco Refining and Marketing, Kimberly-Clark, and BNSF

April 14, 1998

Prepared by

Pacific Environmental Group, Inc. 4020 - 148th Avenue NE, Suite B Redmond, Washington 98052

Project 520-165.1A



CONTENTS

EXECUTIVE SUMMARY	i
1.0 INTRODUCTION	1
1.1 Scope of Work	1
1.2 Site Description	2
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EXECUTIVE SUMMARY

An environmental assessment of soil and groundwater conditions was performed at 2600 Federal Avenue in Everett, Washington. Pacific Environmental Group, Inc. (PEG) conducted this assessment on behalf of Chevron, Texaco, Kimberly-Clark, and BNSF. The scope of work for this environmental assessment was presented in a sampling and analysis workplan dated August 20, 1997, and was performed between November 17, 1997 and January 19, 1998. This workplan was developed in response to the Washington Department of Ecology's decision to name Chevron, Texaco, Kimberly-Clark, and BNSF as Potentially Liable Persons (PLPs), in regard to petroleum contamination found adjacent to the City of Everett Combined Sewer Outfall (CSO) line, which resulted in an oil release into Port Gardener Bay in 1995.

The project consisted of the following tasks:

- Install fifteen exploratory soil probes (Probe 1 through Probe 15).
- Install two soil borings and convert them to groundwater monitoring wells (KC-1 and KC-2).
- Collect soil and groundwater samples from the borings and probes.

Measurable thicknesses of separate-phase hydrocarbons were not identified in any of the soil probes or monitoring wells installed during this investigation. The analytical results from the soil probes and groundwater monitoring wells indicate that the highest concentrations of hydrocarbons in soil and groundwater are limited to the area immediately adjacent to the CSO line. There is no evidence from this investigation that the former facilities on the 2600 Federal Avenue property contributed to the separate-phase hydrocarbons encountered during repair of the CSO line in 1996.

1.0 INTRODUCTION

1.1 Scope of Work

This investigation was performed between November 17, 1997 and January 19, 1998. The purpose of this investigation was to evaluate soil and groundwater quality in the vicinity of several former petroleum bulk plants adjacent to Port Gardner Bay in Everett, Washington (Figure 1). The goal of this investigation was to show whether evidence exists that would suggest the former facilities contributed to the separate-phase hydrocarbons documented at the CSO line. The scope of work consisted of the following tasks:

- Prepare a site safety plan for the project in accordance with WISHA and OSHA regulations.
- Install fifteen exploratory soil probes (Probe-1 through Probe-15) using a direct push probe sampling rig, and a hand auger.
- Install two soil borings using a hollow-stem auger drilling rig. Convert the borings to groundwater monitoring wells (KC-1 and KC-2) using 2-inch diameter Schedule 40 PVC well casing with 0.020-inch slotted screen.
- Collect soil samples from the borings and probes for soil characterization and possible laboratory analysis.
- Conduct field screening of soil samples using a photoionization detector and an oil sheen test.
- Develop and sample the two newly installed monitoring wells.
- Submit soil and groundwater samples and appropriate documentation to a Washington State accredited laboratory for analyses.
- Prepare this report.

Each of these tasks is described in detail in Section 2.0, and the findings and conclusions are presented in Sections 3.0 and 4.0.

1.2 Site Description

The project site is located on the Port Gardner Bay waterfront near Federal Avenue and the foot of Everett Avenue in Everett, Snohomish County, Washington. The property being investigated is currently the site of a pulp and paper mill owned by Kimberly-Clark, a railroad right-of-way owned by BNSF, and part of the Port of Everett that includes a log yard and a towing business (Dunlap Towing), hereafter referred to as "the Site". The Site was the former location of petroleum bulk plants operated by Standard Oil of California (Chevron) and Associated Oil Company (Texaco). Aboveground petroleum storage tanks were also operated on the Site until recently by Kimberly-Clark. Figure 2 shows the locations of former facilities in relation to the current property use.

The subject property is located in the NE ¼ of the SW ¼, and the NW ¼ of the SE ¼, Section 19 of Township 29 North, Range 5 East, Willamette Meridian. According to the United States Geological Survey topographic map of Everett, Washington, the property is located approximately 10 feet above mean sea level.

1.3 Previous Investigations

PEG is not aware of any previous environmental investigations performed at the former Bulk Plant facilities with respect to petroleum hydrocarbons.

Based on information provided by PTI Environmental Services Inc., assessment and remediation activities have occurred on and directly adjacent to the Mobil/American Distributing Co. site, that is located directly south of the Kimberly-Clark mill. In August and October of 1995, the U.S. Coast Guard responded to an oil discharge in Port Gardener Bay that was traced to the City of Everett combined sewer outfall (CSO). The CSO line runs east-west directly south of the Kimberly-Clark warehouse (Figure 2). The oil from the discharge was matched to a sample from the Mobil/American Distributing Co. site.

In April 1996, an Agreed Order was issued by Ecology to Mobil and American Distributing Co., which focused on elimination of oil discharge from the CSO line, followed by definition of the nature and extent of contamination. In June and July 1996, the CSO line was excavated and repaired. Approximately 23,000 gallons of #3 or #4 fuel oil were recovered during dewatering activities for the CSO line repair by Mobil/American Distributing Co. Approximately 800 cubic yards of petroleum contaminated soil were hauled off-site for disposal by Mobil/American Distributing Co.

2.1 Soil Probe Installation

Transglobal Environmental Geosciences Northwest Inc. (TEG) of Olympia, Washington installed fourteen exploratory soil probes (Probe 2 through Probe 15) to depths ranging from 4 to 13 feet below grade on November 17 and 18, 1997. Soil probe locations were positioned in proximity to former facilities on the Site that could be potential sources of petroleum hydrocarbons, and adjacent to the CSO line. A direct-push hydraulic drive point system was used and a PEG geologist using the Unified Soil Classification System logged the borings. Following the collection of soil samples, the borings were abandoned by grouting with a bentonite sealant to the surface. Investigative procedures are presented in Appendix A. Soil probe locations are presented on Figure 2. Soil probe logs are presented in Appendix B.

2.1.1 Soil and Groundwater Sampling

Soil Probe 1 could not be accessed with the Strataprobe rig, therefore a soil sample was collected from this location utilizing a stainless steel hand auger. Soil samples were collected continuously from a depth of one foot below grade to the bottom of the soil borings in soil Probe 2 through Probe 4, and Probe 7 through Probe 15, utilizing a direct-push hydraulic drive point system. Soil samples were collected continuously from a depth of three feet and two feet below grade in soil Probe 5 and Probe 6, respectively. Soil samples retained for chemical analyses were placed in laboratory supplied sample jars with Teflon[®] lined lids. The samples were placed on ice during transport and submitted to North Creek Analytical, Inc. in Bothell, Washington for chemical analysis. Groundwater samples were also collected from each probe location utilizing a screened probe section which was sampled using a peristaltic pump with disposable tubing.

Soil samples were field screened for the presence of organic vapors using a Thermo Environmental Instruments Inc. Model 580B PID with a 10.0 electron volt (eV) lamp. Soil screening procedures are described in Appendix A. It should be noted that the PID measurements are considered semi-quantitative data since the instrument detects all organic compounds with ionization potentials less than 10 eV. PID results for the soil samples ranged from non-detectable levels to 86 parts per million (ppm). In addition, the soil samples were

field screened for oil sheens. Oil sheen screening procedures are presented in Appendix A. The results of this field screening are also recorded on the exploratory boring logs in Appendix B.

2.2 Soil Borings and Monitoring Well Installation

Two exploratory soil borings (KC-1 and KC-2) were drilled by Cascade Drilling of Bothell, Washington on January 16, 1998. The boring locations were chosen to determine if the former facilities might have contributed to the petroleum hydrocarbons observed in the CSO line excavation. The borings were installed to depths of approximately 16.5 feet below the floor within the existing Kimberly-Clark warehouse. The borings were moved slightly from the original locations in the sampling and analysis workplan to avoid high-traffic areas. Holes were cut through the concrete floor to allow drilling equipment to access the soil.

There was an open space between the warehouse floor and the ground surface. The ground surface was approximately five feet below the concrete warehouse floor at Well KC-1, and approximately 4.5 feet below the floor at Well KC-2. The casings for these two wells protrude above the ground surface and are completed just below the warehouse floor to allow access from within the warehouse. The exploratory boring logs show detail of this well completion arrangement.

2.2.1 Soil Sampling

Eight-inch outside diameter hollow-stem auger drilling equipment was used and a PEG geologist using the Unified Soil Classification System logged the borings. Initial soil samples were collected at approximately seven and nine feet below the warehouse floor, and sampling continued thereafter at approximately five-foot intervals to the total depth explored. Soil samples for chemical analyses were retained in laboratory-supplied glass jars with TeflonTM lined lids. The samples were placed on ice for transport to North Creek Analytical, Inc. accompanied by chain-of-custody documentation. Investigative procedures and sample preservation techniques are presented in Appendix A. Boring locations are shown on Figure 2. Soil samples were field screened for oil sheens and for the presence of organic vapors using a PID. PID test procedures and oil sheen field screening procedures are described in Appendix A. The results of the field screening are recorded on the exploratory boring logs in Appendix B.

2.2.2 Well Casing Installation

The two borings were converted to groundwater monitoring wells (KC-1 and KC-2) with the installation of 2-inch diameter, Schedule 40 PVC casing with 0.020-inch factory slotted screen. The well screen was placed across the saturated zone and extended from approximately 2 feet to 10 feet below ground surface in Well KC-1, and from approximately 1.5 feet to 11.5 feet

below ground surface in Well KC-2. Ground surface refers to the soil surface below the warehouse floor. Refer to the boring logs in Appendix B for specific information on well construction. The annular space of each well was packed with a graded 10x20 Colorado silica sand. The sand pack was placed across the entire screened interval, extending approximately six inches above the top of the screens. The annular space of each well was then sealed with hydrated bentonite chips to the ground surface beneath the warehouse floor. A plug-type locking device was installed at the top of each monitoring well. A metal plate able to withstand forklift traffic was placed in the opening of the concrete floor. Soil cuttings generated during drilling remained beneath the warehouse floor.

2.2.3 Well Development and Groundwater Sampling

Monitoring Wells KC-1 and KC-2 were developed on January 16, 1998 by surging and bailing. Well development procedures and records are presented in Appendix A.

Groundwater samples were collected from Wells KC-1 and KC-2 on January 19, 1998. Depths to groundwater in Wells KC-1 and KC-2 on this date were 6.53 feet and 5.78 feet below top of casing, respectively. Well locations are shown on Figure 2.

Prior to sampling, each well was visually checked for the presence of sheens using a clear single-use disposable polyethylene bailer. No sheens were observed in the wells. The wells were then purged of a minimum of three casing volumes of water by bailing. Groundwater samples were collected after the wells recovered to at least 60 percent of the pre-purge static water level. Samples were collected with a single-use disposable bailer. Groundwater sampling procedures are described in detail in Appendix A. Field sampling data sheets are also presented in Appendix A.

One blind duplicate sample (KC-X) was collected from Monitoring Well KC-2. One trip blank sample (Trip Blank) was also prepared utilizing laboratory provided deionized water, and was carried throughout the sampling event.

Development and purge water was placed directly into the mill's wastewater disposal system.

2.3 Analytical Program

Soil and groundwater samples that were selected for laboratory testing were analyzed for one or more of the following parameters:

PARAMETER **	METHOD
Total Petroleum Hydrocarbons as gasoline (TPH-gasoline)	Washington Method WTPH-G
TPH-diesel and TPH-oil	Washington Method WTPH-D plus Extended
Dongers tolyans other hangers	The state of the state of the state of
Benzene, toluene, ethyl benzene and xylenes (BTEX compounds)	EPA Method 8020

The samples were analyzed by North Creek Analytical of Bothell, Washington.

3.1 Subsurface Conditions

In general, soil encountered during soil probe and monitoring well installations consisted of silty sand, and sand. Occurrences of clay, wood, and organic material were also noted in some locations. Boring logs that show detailed lithologic descriptions are included in Appendix B. Groundwater was generally encountered during soil probe installation at depths less than five feet below grade. Measurable thicknesses of separate-phase hydrocarbons were not observed in any of the soil probe or boring locations. Hydrocarbon sheens were noted in soil samples from Probe 6, Probe 7, and Probe 11. On January 19, 1998, depth to groundwater in Monitoring Wells KC-1 and KC-2 was 6.53 feet and 5.78 feet below top of casing, respectively, which is approximately 1.5 feet below the ground surface under the warehouse floor.

3.2 Sample Analytical Results

3.2.1 Soil

A total of three soil samples were submitted for analysis from soil Probe 7, soil Probe 11, and Boring KC-1. The soil samples collected from the soil probes were submitted for analysis based on the observation of sheens during field screening. The soil sample submitted from Boring KC-1 was collected from just above the groundwater interface. Concentrations of TPH-gasoline, TPH-diesel, and TPH-oil were detected in the three soil samples, however all concentrations were below the respective MTCA Method A cleanup levels.

The soil analytical results are summarized in Table 1. Laboratory analytical reports and chain-of-custody documentation are included in Appendix C. Figure 2 should be referenced for sample locations.

3.2.2 Groundwater

Groundwater samples from Probe 3, Probe 4, Probe 5, Probe 7, and Probes 10 through 15 contained detectable concentrations of TPH-gasoline, TPH-diesel, TPH-oil, or BTEX compounds. However, only the samples from Probe 7, Probe 11, Probe 13, and Probe 14

only 3 Sant

contained TPH-diesel and/or TPH-oil concentrations exceeding MTCA Method A cleanup levels. The samples from Probe 7 and Probe 11 (closest to the CSO line) contained the highest TPH concentrations. Concentrations of TPH-diesel in Probe 7 and Probe 11 were 52,400 parts per billion (ppb) and 56,000 ppb, respectively. Concentrations of TPH-oil in Probe 7 and Probe 11 were 38,400 ppb and 43,900 ppb, respectively. Groundwater analytical results are summarized in Table 2.

The groundwater sample from Well KC-1 contained a detectable concentration of TPH-diesel, below the MTCA Method A cleanup level. The sample from Well KC-2 contained no detectable concentrations of TPH or BTEX compounds. Groundwater analytical results are summarized in Table 2.

A blind duplicate water sample (KC-X) was submitted for analysis, along with a trip blank. The blind duplicate was a duplicate sample from Well KC-2. The blind duplicate contained detectable concentrations of TPH-gasoline and TPH-diesel. Blind duplicate sample KC-X does not correlate with the non-detectable concentrations observed in the sample from Well KC-2, and may indicate a field or laboratory error. However, the concentrations reported in Sample KC-X were not significantly higher than the method reporting limits, and may represent a statistical variation in the laboratory analysis. Concentrations of TPH or BTEX were not detected in the trip blank sample.

Laboratory analytical reports and chain-of-custody documentation are included in Appendix C. Figure 3 should be referenced for sample locations and TPH concentrations.

4.0 CONCLUSIONS

Based on laboratory analytical data, the following conclusions can be made:

- No measurable thicknesses of separate-phase hydrocarbons were identified in any of the soil probes or monitoring wells installed during this investigation.
 - Detected concentrations of TPH-gasoline, TPH-diesel, TPH-oil, and toluene in the soil samples analyzed from the exploratory soil probes and borings did not exceed the respective Washington State Model Toxics Control Act (MTCA) Method A cleanup levels.
- Groundwater samples collected from soil Probe 7 and soil Probe 11 (nearest the CSO line) exceeded the MTCA Method A cleanup level for TPH-diesel at levels of 52,400 ppb and 56,000 ppb, respectively.
- Groundwater samples collected from soil Probe 7 and soil Probe 11 (nearest the CSO line) exceeded the MTCA Method A cleanup level for TPH-oil at levels of 38,400 ppb and 43,900 ppb, respectively.
- Groundwater samples collected from soil Probe 13, and soil Probe 14 exceeded the MTCA Method A cleanup level for TPH-oil at levels of 1,420 ppb and 2,930 ppb, respectively.
- All other detected concentrations of BTEX compounds, TPH-gasoline, TPH-diesel, and TPH-oil in groundwater samples were below the MTCA Method A cleanup levels.

The analytical results from the soil probes and groundwater monitoring wells demonstrate that the highest concentrations of hydrocarbons in soil and groundwater are found immediately adjacent to the CSO line. There is no evidence from this investigation that the former facilities located north of the CSO line contributed to the separate phase hydrocarbons encountered during repair of the CSO line.

5.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

ENVIRONMENTAL INVESTIGATION

2600 Federal Avenue Everett, Washington February 12, 1998

PEG Project Number 520-165.1A

This report prepared for:

Chevron Products Company, Texaco Refining and Marketing Inc., Kimberly-Clark, and BNSF

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TABLE 2 GROUNDWATER ANALYTICAL RESULTS

Former Bulk Fuel Facilities 2600 Federal Avenue Everett, Washington

Sample I.D.	Date	Benzene (ppb)	Toluene (ppb)	Ethyl- benzene (ppb)	Xylenes (ppb)	TPH- Gasoline (ppb)	TPH- Diesel (ppb)	TPH-Oil (ppb)
Probe 2	11/17/97	ND	ND	ND	ND	ND	ND	ND
Probe 3	11/17/97	ND	ND	ND	ND	ND	ND	766
Probe 4	11/17/97	0.877	0.569	0.602	2.52	137	276	ND
Probe 5	11/17/97	ND	ND	ND	ND	64.6	ND	ND
Probe 6	11/17/97	ND	ND	ND	ND	ND	ND	ND
Probe 7	11/17/97	ND	ND	ND	ND	327	52,400	38,400
Probe 8	11/17/97	ND	ND	ND	ND	ND	ND	ND
Probe 9	11/17/97	ND	ND	ND	ND	ND	ND	ND
Probe 10	11/17/97	ND	0.672	ND	ND	ND	ND	ND
Probe 11	11/17/97	ND	ND	ND	4.86	736	56,000	43,900
Probe 12	11/17/97	ND	0.715	ND	ND	ND	ND	ND
Probe 13	11/18/97	ND	ND	ND	ND	ND	ND	1,420
Probe 14	11/18/97	ND	ND	ND	ND	ND	311	2,930
Probe 15	11/18/97	ND	1.26	1.23	2.37	172	ND	ND
KC-1	01/19/98	ND	ND	ND	ND	ND	430	ND
KC-2	01/19/98	ND	ND	ND	ND	ND	ND	ND
KC-X*	01/19/98	ND	ND	ND	ND	57.9	355	ND
Trip Blank	01/19/98	ND	ND	ND	ND	ND	NA	NA
MTCA Method A	MTCA Method A Cleanup Levels:		40	30	20	1000	1000	1000
Laboratory Reporting Limits:		0.50-1.0	0.50-1.0	0.50-1.0	1.00	50.0	250	750

Concentrations reported as parts per billion (ug/l)

Certified analytical results are included in Attachment B

ND - Not Detected at or above the laboratory reporting limit

NA - Not Analyzed

TPH as Diesel and Oil - Analysis by Washington Method WTPH-D plus extended

TPH as Gasoline - Analysis by Washington Method WTPH-G

BTEX Compounds - Analysis by EPA Method 8020A

^{* -} KC-X is a duplicate sample from Well KC-2

TABLE 1 SOIL ANALYTICAL RESULTS

Former Bulk Fuel Facilities 2600 Federal Avenue Everett, Washington

Sample I.D.	Date	Depth (feet)	Benzene (ppm)	Toluene (ppm)	Ethyl- benzene (ppm)	Xylenes (ppm)	TPH- Gasoline (ppm)	TPH- Diesel (ppm)	TPH-Oil
Probe 7-3	11/17/97	3.0	ND	0.0545	ND	ND	ND	17.6	71.1
Probe 11-4	11/17/97	4.0	ND	ND	ND	ND	20.7	19.6	52.5
KC1-8.5	01/16/98	8.5	ND	. ND	ND	ND	6.50	52.7	81.8
MTCA Metho	d A Cleanu	p Levels:	0.5	40	20	20	100	200	200
Laboratory Reporting Limits:			0.050	0.050	0.050	0.10	5.0	10.0	25.0

Concentrations reported as parts per million (mg/kg)

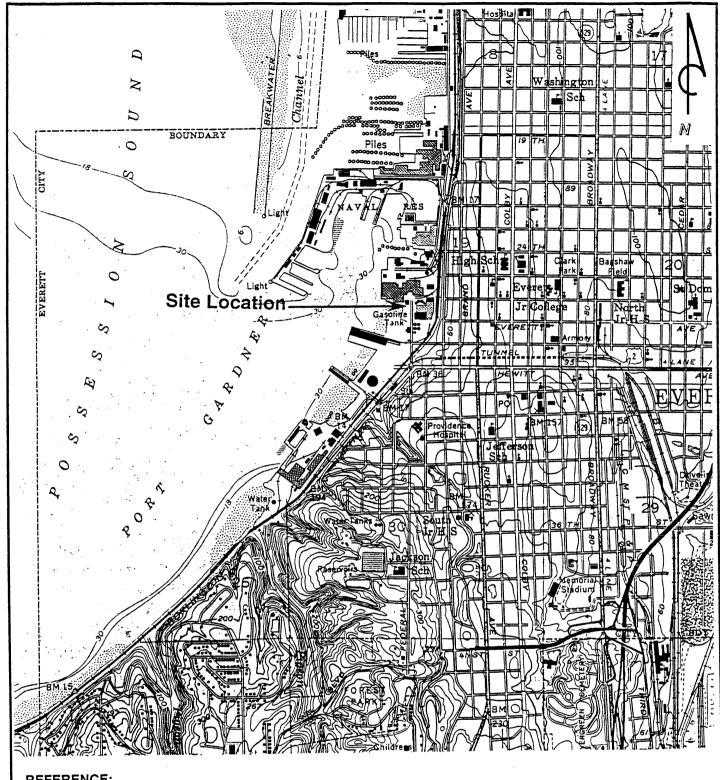
Certified analytical results are included in Attachment B

ND - Not detected at or above the laboratory reporting limits

TPH as Diesel and Oil - Analysis by Washington Method WTPH-D plus extended

TPH as Gasoline - Analysis by Washington Method WTPH-G

BTEX Compounds - Analysis by EPA Method 8020A



REFERENCE:

USGS 7.5 MIN. TOPOGRAPHIC MAP TITLED: Everett, Washington

DATED: 1953 REVISED: 1968 and 1973

COUNTY: Snohomish

SCALE: 1 to 24,000 (1 Inch = Approximately 2000 Feet)



MAP LOCATION

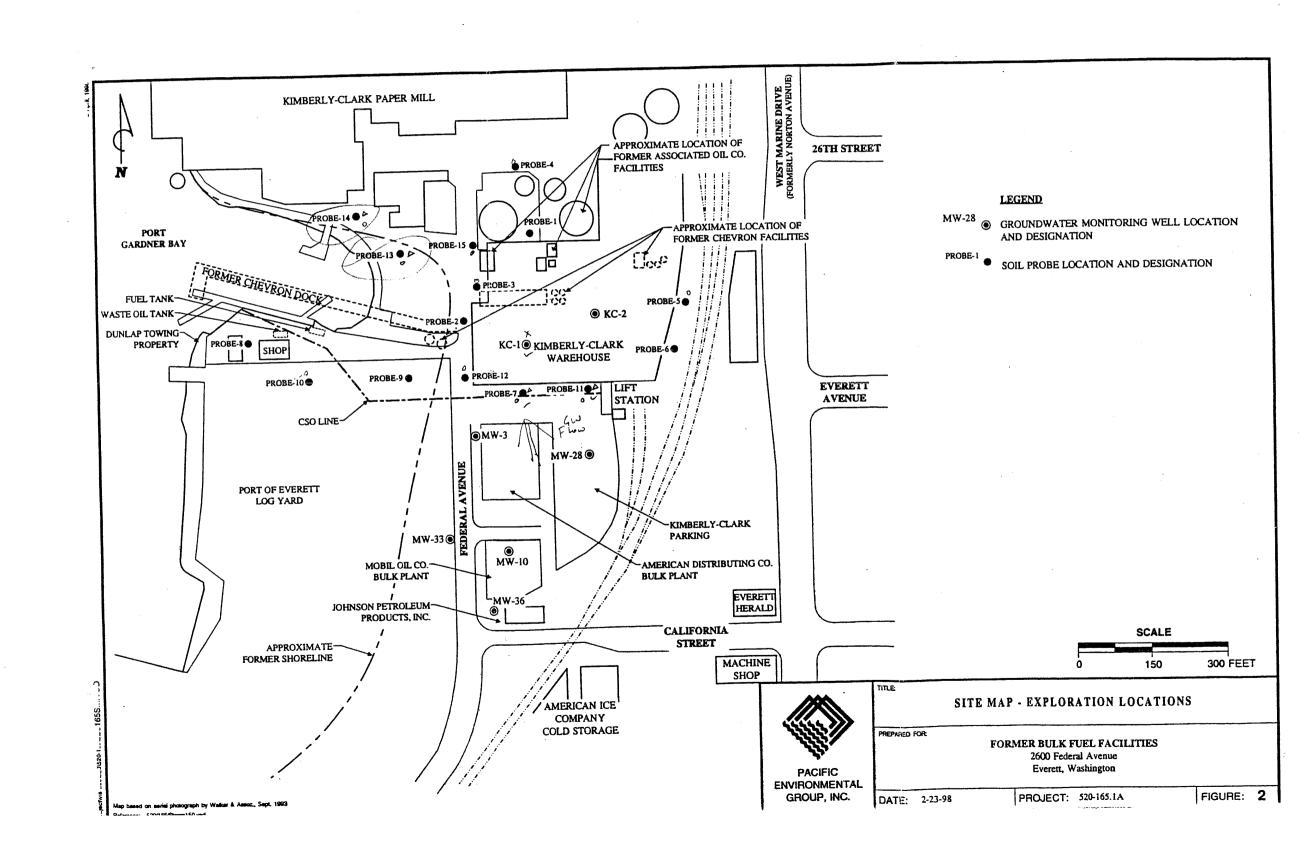


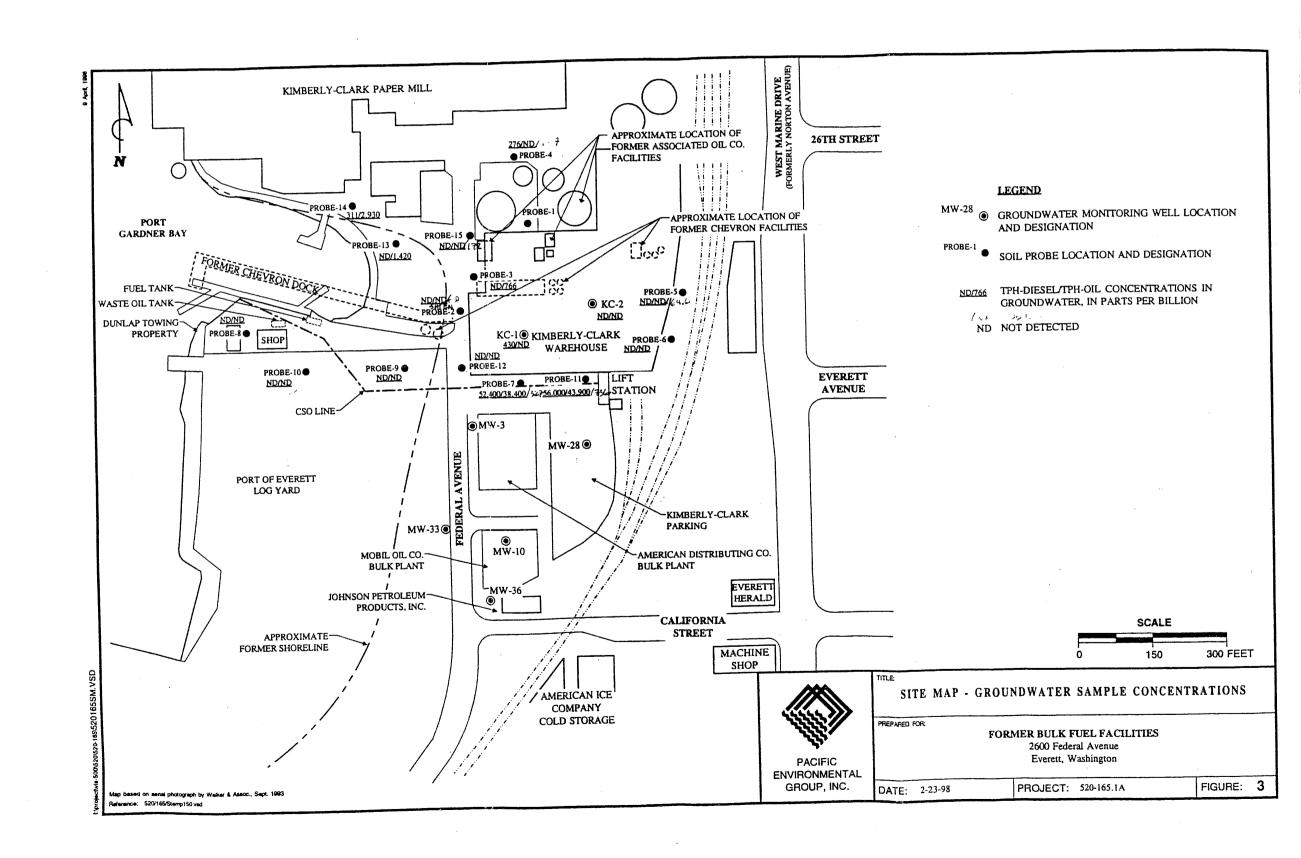
FORMER BULK FUEL FACILITIES 2600 Federal Avenue

Everett, Washington

SITE LOCATION MAP

FIGURE: 1 PROJECT: 520-165.1A





APPENDIX E

Addendum Sampling and Analysis Plan



ADDENDUM TO DRAFT FOCUSED FEASIBILITY STUDY SAMPLING AND ANALYSIS WORK PLAN ExxonMobil / ADC Property, Ecology Site ID 2728 2717/2731 Federal Avenue Everett, Washington

Submitted to:

ExxonMobil Environmental Services

East Providence Terminal 1001 Wampanoag Trail Riverside, Rhode Island 02915

and

American Distributing Company

13618 45th Avenue NE Marysville, Washington 98271

Submitted by:

AMEC Earth & Environmental, Inc.

11810 North Creek Parkway North Bothell, Washington 98011

February 10, 2010

AMEC Project No. 0-915-15716-D

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Attachment A3 City of Everett Street Use Permit Documentation

Attachment A4 Field Documentation Forms

ACRONYMS AND ABBREVIATIONS

ADC American Distributing Company
AMEC AMEC Earth & Environmental, Inc.

bgs below ground surface

BTEX benzene, toluene, ethylbenzene, and xylenes

COC chain-of-custodies
CSS Colorado silica sand
DQIs data quality indicators
DQOs data quality objectives

Ecology Washington State Department of Ecology

EDB ethylene dibromide EDC 1.2-dichloroethane

EPA U.S. Environmental Protection Agency

ExxonMobil ExxonMobil Oil Corporation
FFS Focused Feasibility Study
HASP Health and Safety Plan
HSA hollow stem auger

IDW investigation derived waste mg/kg milligram per kilograms

mg/L milligram/liter

MDLs method detection limits

MS/MSD matrix spike/matrix spike duplicate

mV millivolt

PAHs polycyclic aromatic hydrocarbons

PID photoionization detector

PPE personal protective equipment

ppm parts per million PVC polyvinyl chloride

Property ExxonMobil/ADC Property

QA quality assurance QC quality control

RPD relative percent difference SAP Sampling and Analysis Plan

SD standard deviation

TPH-D total petroleum hydrocarbons-diesel
TPH-O total petroleum hydrocarbons-oil
TPH-G total petroleum hydrocarbons-gasoline

VOCs volatile organic compounds
WAC Washington Administrative Code

WP Work Plan

ADDENDUM TO FFS SAP WORK PLAN 2717/2731 FEDERAL AVENUE EVERETT, WASHINGTON February 10, 2010

1.0 INTRODUCTION

AMEC Earth & Environmental, Inc., (AMEC) has prepared this Addendum to the October 2009 Draft Final Focused Feasibility Study (FFS) Sampling and Analysis (SAP) Work Plan (WP) on behalf of ExxonMobil Oil Corporation (ExxonMobil) and the American Distributing Company (ADC). This Addendum outlines additional soil and groundwater characterization activities that will be conducted to the north and west of the ExxonMobil/ADC Property (the Property) located at 2717 and 2731 Federal Avenue in Everett, Washington (Figure 1). The City of Everett (the City) is planning to upgrade the storm sewer line that will result in trenching within Everett Avenue and Federal Avenue. In advance of trenching, samples of the soil and groundwater will be collected from borings to determine soil and groundwater disposal options. This Addendum addresses the specific field sampling activities related to the borings, chemical analyses, and quality assurance (QA) procedures associated with borings along the utility alignment.

1.1 Property History

Historically, total petroleum hydrocarbons as diesel (TPH-D), oil (TPH-O), and gasoline (TPH-G), benzene, toluene, ethylbenzene, xylenes, polycyclic aromatic hydrocarbons (PAHs), and lead were found in soil and groundwater beneath the Property and beneath properties to the west, north, and east. Petroleum contamination has resulted from past releases from former operations at the ExxonMobil and ADC Parcels and other similar businesses in the area.

2.0 OBJECTIVES

The objective of the soil and groundwater characterization beneath Everett Avenue and Federal Avenue is to collect sufficient analytical data for disposal classification. Elements of this addendum are based on the Washington Administrative Code (WAC) Ecology Model Toxics Control Act (MTCA) Cleanup Regulations WAC 173-340-820 and City of Everett Waste Water discharge regulations. The proposed location for the disposal of soil from the utility excavation is the CEMEX facility in Everett. The soil and groundwater sampling will include the following activities:

- 1. Advance five borings (three along Everett Avenue and two along Federal Avenue [Figure 2]) to evaluate the concentration of chemicals in soil and groundwater. The borings will be advanced at each location using a hollow stem auger (HSA) drill rig to the total depth of the proposed trench at the location of each boring. Two of the borings will be terminated at a minimum depth of 20 feet below ground surface (bgs) to provide soil lithology information for the City's geotechnical engineer.
- 2. Collect continuous samples from the borings using a standard penetration test (SPT) and a split spoon (SS).

- Collect two to three composite soil samples from each boring for laboratory analyses.
 The first composite will be from the top four feet and the second from the lower four feet.
 Discreet samples for volatile organic compounds (VOC) analysis will be collected from the upper four feet and from the SPT.
- 4. Collect "grab" water samples from each boring. If sheen or product is encountered, an additional water sample will be collected from just below the water table (a foot or two below).
- 5. Soil samples will be analyzed for CEMEX acceptance criteria and "grab" groundwater samples will be analyzed for the City of Everett sanitary sewer discharge criteria. The soil and groundwater samples will be performed on a one-week turn-around schedule.

3.0 PROJECT ORGANIZATION AND RESPONSIBILITIES

The project is organized as follows:

ExxonMobil and ADC are the owners of the Property.

AMEC Earth & Environmental, Inc. (AMEC) is the environmental consultant for this project.

- Gary Dupuy (phone number 206-342-1777) and Meg Strong (phone number 425-368-0966) are the client managers for the project.
- Leah Vigoren (phone number 206-838-8470) is the project manager and is responsible for project management. Technical and administrative elements are included in her project management responsibilities.
- Anastasia Speransky (phone number 206-838-1776) is the task manager for the project and quality assurance manager for this project, which includes data quality objectives, and quality assurance/quality control (QA/QC) objectives as well as health and safety.

Cascade Drilling, Inc. in Woodinville, Washington, is the drilling contractor for the project.

Test America, Inc., in Nashville, Tennessee, is responsible for managing analyses of the samples collected. The laboratory is also responsible for sample preparation and ensuring that the QA/QC results from the laboratory are valid.

The geotechnical engineer will be provided by the City of Everett.

4.0 DATA QUALITY OBJECTIVES

Data Quality Objectives (DQOs) is a quality management tool developed by the U.S. Environmental Protection Agency (EPA) that is used to facilitate the planning of data collection activities. The DQO process provides a systematic procedure for defining criteria in the data collection design. The primary reference for the formal DQO process is EPA's guidance document (EPA 1994). The DQO process consists of the following seven key steps.

- 1. State the problem.
- 2. Identify the decision.
- 3. Identify the inputs to the decision.
- 4. Define the boundaries of the study.
- 5. Develop a decision rule.
- Specify tolerable limits on decision errors.
- 7. Optimize the design for obtaining data.

DQOs are qualitative and quantitative statements, developed using the DQO process, that are intended to clarify study objectives, define an appropriate type of data, and specify tolerable levels of potential decision errors that will be used as the basis for establishing the quality and quantity of data needed to support decisions.

Data Quality Indicators (DQI) (accuracy, precision, completeness, representativeness, comparability, and method detection limits) refer to quality control criteria established for various aspects of data gathering, sampling, or analysis activity. In defining DQIs specifically for the project, the level of uncertainty associated with each measurement is determined.

Accuracy is the degree of agreement of a measurement with a known or true value. To determine accuracy, a laboratory or field value is compared to a known or true concentration. Accuracy is determined by such quality control (QC) indicators as: matrix spikes (MS), surrogate spikes, laboratory control samples (blind spikes) and performance samples.

Precision is the degree of mutual agreement between or among independent measurements of a similar property (usually reported as a standard deviation [SD] or relative percent difference [RPD]). This indicator relates to the analysis of duplicate laboratory or field samples. An RPD of ≤50% for water and ≤50% for soil, depending upon the chemical being analyzed, is generally acceptable. Typically field precision is assessed by field duplicates and laboratory precision is assessed using laboratory duplicates, matrix spike duplicates, or laboratory control sample duplicates).

Completeness is expressed as percent of valid usable data actually obtained compared to the amount that was expected. Due to a variety of circumstances, sometimes either not all samples scheduled to be collected can be collected or else the data from samples cannot be used (for example, samples lost, bottles broken, instrument failures, laboratory errors, etc.). The minimum percent of completed analyses defined in this section depends on how much information is needed for decision making. Generally, completeness percent goals increase when the fewer the number of samples are collected per event or the more critical the data are for decision making. Goals in the 90 to 95% range are typical.

Representativeness is the expression of the degree to which data accurately and precisely represent a characteristic of an environmental condition or a population. It relates both to the

area of interest and to the method of taking the individual sample. The idea of representativeness should be incorporated into discussions of sampling design. Representativeness is best assured by a comprehensive statistical sampling design, but it is recognized that this is usually outside the scope of most one-time events. Most one-time event SAPs focus on issues related to judgmental sampling and why certain areas are included or not included and the steps being taken to avoid either false positives or false negatives.

Comparability expresses the confidence with which one data set can be compared to another. The use of methods from EPA or "Standard Methods" or from some other recognized sources allows the data to be compared facilitating evaluation of trends or changes in a site, a river, groundwater, etc. Comparability also refers to the reporting of data in comparable units so direct comparisons are simplified (e.g., this avoids comparison of milligram/liter (mg/L) for nitrate reported as nitrogen to mg/L of nitrate reported as nitrate, or parts per million (ppm) vs. mg/L discussions).

Detection Limit(s) (usually expressed as method detection limits [MDLs] or Quantitation Limit[s]) for all analytes or compounds of interest for all analyses requested is presented in Tables 1 and 2. These limits should be related to any decisions that will be made as a result of the data collection effort. A critical element to be addressed is how these limits relate to any regulatory or action levels that may apply.

Data Review and Management

Data management will commence during the field investigation. Each soil and groundwater sample collected will be recorded in a bound field book which will include a description of the location, depth, matrix, sample ID, and date and time of collection. Once data has returned from the laboratory, the electronic deliverables will be reviewed to ensure the receipt of all requested analytes and again cross-checked with chain-of-custodies (COCs). Data will be tabulated in electronic spreadsheets and again checked to ensure proper entry before use in reporting.

Assessment Oversight

The project manager will ensure that sample methods and accurate documentation are being practiced. Quality assurance (QA) systems will be emplaced at regular intervals during the data management process as described above. Finally, a peer review process by a senior technical staff will be conducted on the final reporting.

Corrective Actions

Corrective actions, if necessary, shall be completed. If acceptance criteria were not met and a corrective action was not successful or corrective action was not performed, data will be flagged appropriately. Requirements and procedures for documenting the need for corrective actions are described in this section.

Items requiring corrective action in the laboratory shall be documented by the use of a corrective action report. The QA coordinator or any other laboratory member can initiate the corrective action report request in the event QC results exceed acceptability limits, or upon identification of some other laboratory problem. Corrective actions can include reanalysis of the sample or samples affected, re-sampling and analysis, or a change in procedures, depending upon the severity of the problem.

5.0 PRE-FIELD ACTIVITIES

AMEC will coordinate the field activities and contract a private utility locating service in addition to contacting the underground utilities location center (Call Before You Dig). In addition, AMEC will update an existing site-specific Health and Safety Plan (HASP) (Attachment A2).

Site access for the borings on Everett Avenue which is owned by Kimberly Clark will be obtained by the City of Everett. AMEC will prepare and submit to the City the traffic control plan and right of way access applications for the work (Attachment A3).

6.0 FIELD PROCEDURES

This section presents the field investigation procedures for the soil and groundwater sampling effort. The field investigation will consist of drilling soil borings and collecting soil and groundwater samples. The proposed soil boring locations are illustrated on Figure 2. The proposed soil boring depths and specifications are listed in Table 3.

6.1 Field Health and Safety Procedures

AMEC field personnel will adhere to the health and safety procedures detailed in the *Site-Specific Health and Safety Plan*. City staff must follow their own Health and Safety Plan.

The hospital closest to the Site is Providence Hospital. An emergency contact list and a map illustrating the emergency route to Providence Hospital are located in the *Health and Safety Plan*.

It is anticipated that all fieldwork will be performed using Level D modified personal protective equipment (PPE). At a minimum, each on-site worker will be required to wear safety footwear (steel-toed boots), hard hat, hearing protection, eye protection, and a high visibility safety vest. In addition, AMEC and AMEC's contractors will be required to wear hand protection (e. g. leather and/or nitrile gloves). PPE will be upgraded whenever there is a potential for direct contact with contaminated soil or groundwater. Changes in the required PPE will be based on changed work conditions and field observations. PPE upgrades may consist of the following:

- Tyvek Coveralls if a splash transfer is considered likely;
- Additional PPE upgrades that may be required, depending on breathing zone levels of petroleum hydrocarbons detected.

Eating, drinking, chewing gum or tobacco, smoking, or any practice that involves hand-to mouth contact increases the probability of contaminant ingestion and is prohibited in any area where the possibility of contamination exists.

Potential physical hazards that may be encountered include heat stress, slips, trips, and falls.

The AMEC field team will have current certifications for first aid, and a cell phone will be available at all times while personnel are in the field. All emergency response services will be reached by calling 911, from a land line if available.

6.2 Field Preparation

A Right of Way permit will be prepared and submitted to the City of Everett. The Traffic Control Plan is included in Attachment A3.

6.3 Utility Survey

AMEC will arrange a meeting with the City of Everett to mark the boring locations prior to initiation of field activities. During the markings of the borings, AMEC will identify all aboveground and overhead power lines. Proposed boring locations that are within 25 feet of an overhead power line will be moved until clearance is achieved. AMEC will also oversee a geophysical survey conducted by a private utility locator to identify subsurface utilities within 25 feet of the proposed soil boring locations. The presence of below-grade utilities will be identified, and their inferred locations will be marked on the ground surface at the site. In addition, subsurface activity locations may be reviewed with the City, if available at the time. During the utility location by the private contractor, the area noted as the former underground fuels lines will be specifically investigated in an attempt to identify the position of the pipes.

6.4 Calibration of Field Equipment

Calibration of a photo-ionization detector (PID) will occur daily at the beginning of field activities. Calibration results and times will be recorded in the field notes.

Calibration instructions for the PID are included with the equipment manuals enclosed in the equipment cases. In general, the PID will be used to screen soil for the presence of lighter end petroleum hydrocarbons, such as gasoline and benzene.

6.5 Soil Borings

Three soil borings (CE-1 through CE-3) will be advanced along Everett Avenue and two soil borings (CE-4 and CE-5) will be advanced along Federal Avenue (Figure 2). The borings will be advanced at each location using a HSA drill rig. Soil borings CE-1, CE-3, and CE-4 will be terminated at the total depth of the proposed trench at the location of each boring (approximately 8 feet bgs at each location). Soil borings CE-2 and CE-5 will be terminated at a minimum depth of 20 feet bgs to provide soil lithology information for the City. Proposed soil boring depths and specifications are listed in Table 3.

Per ExxonMobil Standard Operation Procedures (SOPs), 4-feet subsurface clearance will be performed by hand augering and vactor truck. The auger with round edges will be turned slowly and not forced through the soil. All soil boring locations are subject to change based on observed conditions in the field (aboveground and belowground utilities, existing equipment, etc.).

6.6 Soil Sample Collection

The purpose of the soil sampling is to characterize soil for proper disposal so that the City can direct load onto a truck during trenching. The first four feet generated during the hand augering for utility clearance will be composited to form the first sample. The second composite sample will be generated by blending continuous discreet soil samples collected by SPT from four to eight feet. Discrete samples for VOC and gasoline analysis will be taken from the composited upper sample and from the SPT.

The City of Everett's geotechnical engineer will log the lithology and obtain samples for grain size distribution analysis. AMEC's field representative will examine relevant chemical sample information (e.g., visual and olfactory observation and PID measurement) and will collect soil samples for laboratory analyses.

The guideline for the soil samples to be collected is as follows: In each boring, AMEC will collect two composite soil samples from two sampling intervals (1) the interval from the ground surface to 4 feet bgs using a hand auger and (2) from 4 feet bgs to the bottom of the boring (trench depth – approximately 8 feet). For composite soil samples, soil from each interval will be placed into a heavy 1-quart freezer Ziploc bag and mixed. Gravel and vegetation will be removed from the composite sample. If a discrete layer of asphaltic pavement is encountered, it will be excluded from the sample and its presence noted on the boring log. Composite samples will be collected in three 4-ounce soil jars. Samples will be labeled and chilled on ice in a cooler for delivery under proper chain-of-custody protocol to a Washington-certified analytical laboratory. It is assumed that AMEC will collect two to three discrete soil samples and two to three composite soil sample per boring for laboratory analyses.

Two discrete soil samples will be either collected from the composite sample between zero and four feet bgs and one the SPT. Selection of the sampling location will be based on (1) the interval that exhibited the highest VOC vapor concentration, as measured with a PID and/or (2) intervals of petroleum hydrocarbon staining or odors and/or (3) heavy contamination such as free product is encountered. If VOCs are not detected and no staining or odor is observed, the discreet samples will be collected from a the composite material and the other from below the water table. Discreet soil samples will be collected using a soil core syringe and inserted into a pre-tared 40 milliliter volatile organic analyses (VOA) vial in accordance with EPA Method 5035 sampling methodologies. In addition, a discrete soil sample will be collected in one 4-ounce soil jars for moisture analysis.

Samples for laboratory analyses below the proposed trench depth will not be collected except to assess lithology. To prevent cross contamination, any equipment repeatedly in contact with the soil will be decontaminated before and after each individual sampling attempt.

6.7 Soil Sample Analyses

The soil sample analytical program presented below is based on requirements of the disposal facilities (e. g. CEMEX).

A total of 11 discrete soil samples will be submitted to analytical laboratory for the following analyses:

- Gasoline range TPH, using Ecology method NWTPH as gasoline (NWTPH-Gx),
- All 11 samples will be analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX) and up to 3 of the 11 samples will be selected and submitted for volatile organic compounds (VOCs) by EPA Method 8260B. The three samples will be selected based on visual or olfactory indications of hydrocarbons.

A total of 11 composite soil samples will be submitted to analytical laboratory for the following analyses:

- RCRA eight metals (Ag, As, Ba, Cd, Cr, Hg, Pb, Se) by U. S. Environmental Protection Agency (EPA) Method 200/6000/7000 Series.
- In addition, it is likely that a significant number of the soils may exceed the lower MTCA Method A soil cleanup limit of 19 milligrams per kilogram (mg/kg) for total chromium. A note will be placed on each chain-of-custody directing the laboratory to automatically perform a follow-up hexavalent chromium analysis using EPA Method 7196A for any sample whose total chromium result exceeds 19 mg/kg. We estimate that two samples will be requested to be analyzed for hexavalent chromium.
- If any soil analytical result (in mg/kg) is equal to or greater than 20 times the maximum concentration for the hazardous waste toxicity characteristics listed in 40 CFR 261.24 (in milligrams per liter [mg/L]), then the sample may be analyzed using Toxicity Characteristic Leaching Procedure (TCLP) using U. S. EPA Methods 1311 and 6010 series. (Sample volume will be held for TCLP analysis at the laboratory. We will direct the laboratory to provide notification prior to issuance of the laboratory report so that hold times would be met).
- Diesel and heavy oil range Total Petroleum Hydrocarbons (TPH), using Ecology Method Northwest Total Petroleum Hydrocarbon as diesel and lube oil (NWTPH-Dx). All NWTPH-Dx samples will be prepared in the analytical laboratory using silica gel acid wash to eliminate non-petroleum hydrocarbon interferences.
- Low-level polycyclic aromatic hydrocarbons (PAHs) by EPA method 8270D SIM.

Soil sample methods, required sample containers, preservation requirements, and holding times are provided in Table 4.

Soil samples will be submitted to Ecology-certified Test America, Inc. analytical laboratory located in Nashville, Tennessee for one-week turn around analytical time.

6.8 Groundwater Sample Collection

To collect a "grab" groundwater sample, a temporary 2-inch-diameter, flush-threaded Schedule 40 polyvinyl chloride (PVC) with a 5-foot-long slotted screen will be installed in each boring. The well screens will be installed to straddle the water table. Sand (10/20 CSS) will be placed in the annular space surrounding the screens to minimize turbidity. The sand pack will extend to a height of at least 1 foot above the top of the screen.

Following placing of a screen, water from the temporary well will be pumped using a submersible pump to minimize the amount of suspended solids, and a "grab" water sample will be collected either with a disposable bailer or peristaltic pump. AMEC will record the volume of water removed. The purged groundwater will be contained in 55-gallon drums and stored at the Property pending the analytical results and the City's construction schedule.

6.9 Groundwater Sample Analyses

The groundwater sample analytical program presented below is based on the chemicals likely to be in groundwater from past uses of the Property that may be required to be tested for the holder to discharge water into Port Gardner Bay. For the City of Everett, this includes stormwater that runs through the City's storm drain system as well as treated water discharged from Everett's Water Pollution Control Facility. To comply with the City's discharge regulations, five "grab" groundwater samples from the borings will be analyzed for:

- RCRA 8 metals (Ag, As, Ba, Cd, Cr, Hg, Pb, Se) by EPA Method 6010B/7470A (reporting limit less than 1 microgram per liter),
- Corrosives (pH) by field testing, and
- TPH and BTEX.

Groundwater samples will be submitted to Ecology-certified Test America, Inc. analytical laboratory located in Nashville, Tennessee for one-week turn around analytical time.

In addition, Gene Bennett, a City of Everett discharge expert, will be available at 425-257-8249 for the water discharge questions.

6.10 Sample Containers, Preservation and Storage

Soil and groundwater samples will be collected and placed into precleaned sample containers provided by the analytical laboratory in accordance with Table 4. Upon collection, sample containers will be sealed, labeled, chilled to 4°C in a cooler with ice, and maintained with AMEC's custody until delivery to the project analytical laboratory, Test America, Inc., in Nashville, Tennessee.

6.11 Equipment Decontamination

Decontamination of sampling equipment will be performed to maintain data quality, to prevent cross contamination, and to prevent the potential introduction of contaminants into previously

unimpacted areas. Reusable sampling equipment, including the drill rig, down-hole drilling equipment, and stainless-steel materials, will be decontaminated prior to each sampling event. General decontamination procedures for nondedicated soil and groundwater sampling equipment and accessories are as follows.

- Physically remove soils using a nonphosphate detergent solution.
- Rinse with noncontaminated tap water.
- · Rinse with deionized water.
- Rinse with Isopropyl alcohol.
- Air dry.

6.12 Investigation Derived Waste Management

Investigation Derived Waste (IDW) generated during the course of the field investigation will be labeled and securely stored on the Property in 55-gallon drums approved by the U.S. Department of Transportation. Drums will be stored at a designated location. The various waste streams will include the following:

- Potentially contaminated liquids, including fluids derived from purging and equipment decontamination water;
- Potentially contaminated solids, principally soil cuttings; and
- Personal protective equipment (PPE).

Each drum will be labeled with standardized IDW drum labels to indicate its contents, date of collection, location from which the IDW originated, and other pertinent information. In addition, all drums will also be labeled with indelible paint sticks or pens. AMEC will maintain an inventory of the drums. The purged groundwater and soil cuttings will be stored at the Property pending the analytical results and the City's construction schedule. PPE will be placed in a separate 55-gallon drum and disposed off-site at an appropriate facility.

7.0 DOCUMENTATION

The integrity of data obtained from samples collected during the field investigation depends on proper sample management and handling. Proper sample management includes sample labeling, which includes assignment of a specific identification number and affixing proper identification and markings to the collected samples. Proper handling includes proper packing and transport of the sample containers.

7.1 Field Logbook

The field logbook serves as the primary record of field activities. Entries shall be made chronologically and in sufficient detail to allow the writer or a knowledgeable reviewer to reconstruct the applicable events. The field logbook shall be bound with consecutively numbered and water repellent pages.

At a minimum, the following information will be recorded in either the field logbook or a separate sample log sheet during the collection of each sample:

- Sample location and description;
- Sampler's name(s);
- Date and time of sample collection;
- Type of sample (soil or groundwater);
- Type of sampling equipment used;
- Field instrument readings and calibration; and
- Field observations and details related to analysis or integrity of samples (e.g., weather conditions, noticeable odors, colors, etc.).

7.2 Labeling

Each sample container sent to the lab will have a unique sample identification label. The following information will be included on the sample label:

- Project name and location;
- Project number;
- Sample identification number;
- Date and time of collection; and
- Initials of the sampler.

Each soil sample will be named by the boring number and depth (or depth interval) of sample collection in feet. For example, a discrete soil sample collected from soil boring CE-1 at a depth of 6 feet will have a sample designation as "CE-1-6." A composite soil sample from soil boring CE-2 at a depth interval from the surface to the soil/water interface that was encountered at 3.5

feet bgs will have a sample designation as "CE-2-0-3.5." "Grab" groundwater samples will be named by the boring location, and identified as a grab sample with the date of sample collection. For example, a "grab" groundwater sample collected from boring CE-1 on February 22, 2010, would be named "CE1-G022210."

Duplicate samples will be sent to the laboratory blindly. However, the location of the sample will not be revealed to the laboratory. Instead, duplicate samples will be named sequentially as Dup-1 and Dup-2. The location of the duplicate sample collection will be recorded in the field notebook.

7.3 Sample Chain of Custody

COC forms will be completed at the end of each sampling day. The completed COC form(s) and samples will be kept in the possession of the field team until relinquishing the samples to the laboratory or courier service. One copy of the completed COC form will be kept by the field team, and the original COC form will be stored in a resealable plastic bag and transported in the sample container with the laboratory samples. Custody seals will be placed along the seal of each sample container in order to prevent tampering with the samples. A copy of the COC form is included in Attachment A4.

8.0 DATA VALIDATION

Data validation is the procedure of reviewing data against a known set of criteria to verify data validity prior to its use. Data validation procedures have been developed by the US EPA to standardize the validation process for analytical results for both water-quality and soil-quality investigations and are documented as the *US EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review,* US EPA, Office of Solid Waste and Emergency Response, Washington, D.C., Publication 9240.1-48, US EPA-540/R-08-01 (US EPA 2008). The Functional Guidelines are intended to be used as a guide for evaluation of data generated under statements of work for organic and inorganic analyses associated with the US EPA Contract Laboratory Program (CLP). The Functional Guidelines also provide general data validation guidelines that can be applied to data generated by non-CLP analytical methods.

One hundred percent (100%) of the analytical data for soil and groundwater samples will be validated using EPA Stage 4 data validation level. Stage 4 validation includes an examination of sample and QC raw data and instrument printouts to check for technical, calculation, analyte identification, analyte quantitation, and transcription or reduction errors. At a minimum 10% of reported results on summary forms should be confirmed by recalculation. The data validation staff will review field documents and laboratory data report packages, and if needed, apply data qualifiers to the data. The data reviewer will determine if the project data quality objectives have been met, and will calculate the data completeness for the project.

9.0 QUALITY CONTROL

This Addendum has been prepared to provide instructions and guidance to ensure the sample chemical data collected in support of the site soil and groundwater sampling results are scientifically valid. The sections below outline methods and processes to meet these objectives.

9.1 Field Quality Control Samples

To evaluate quality control (QC), a blind field duplicate sample will be collected at a frequency of 5 percent of the samples for each matrix (soil and groundwater).

Two trip blank vials provided by the laboratory will be placed into the cooler designated to store samples to be analyzed for VOCs to evaluate the potential for cross-contamination. Field duplicates are replicate samples collected at the same location during the same sampling session (roughly at the same time). The field duplicate samples will be collected in the same container types and handled and analyzed in the same manner, as all other soil and groundwater samples. The field duplicates will be analyzed for the same analytes as the primary sample.

9.2 Laboratory Quality Control Samples

Laboratory QC samples are analyzed as part of standard laboratory practice. The laboratory monitors the precision and accuracy of the results of its analytical procedures through analysis of QC samples. In part, laboratory QC samples consist of Matrix Spike/Matrix Spike Duplicate (MS/MSD) samples for organic analyses, and MS/MSD for inorganic analyses. The term "matrix" refers to use of the actual media collected in the field (e.g., routine soil and water samples). Laboratory QC samples are an aliquot (subset) of the field sample. They are not separate samples, but a special designation of an existing sample. The laboratory QC samples will be analyzed for the same analytes as the standard samples.

9.3 Field Variances

As conditions in the field may vary, it may become necessary to implement minor modifications to the sampling as presented in this Addendum. When appropriate, ExxonMobil, ADC, and the City of Everett will be notified and a verbal (followed by a written verification) approval will be obtained before implementing the changes. Modifications to the approved plan will be documented in the sampling project report.

9.4 Data Management

Data management will commence during the field investigation. Each soil and groundwater sample collected will be recorded on field logs, which will include a description of the location, depth, matrix, sample ID, and date and time of collection. All data submittals will be consistent with Ecology Policy 840 (dated March 31, 2008) Environmental Information Management (EIM) submittal requirement format. Once data have been provided by the laboratory, the electronic

deliverables will be reviewed to ensure the receipt of all requested analytes and again cross-checked with COCs.

10.0 REFERENCES

- AMEC Earth & Environmental, Inc. (AMEC), 2009. Draft Final Focused Feasibility Study Work Plan for ExxonMobil / ADC Property, Ecology ID 2728, 2717/2731 Federal Avenue, Everett, Washington, Bothell, Washington, October 2.
- U.S. Environmental Protection Agency (EPA), 1994. *Guidance of the Data Quality Objectives Process*, EPA QA/G-4. EPA/600/R-96/055, EPA Office of Research and Development, Washington, D.C. September.
- Puls, R.W. and Barcelona, M.J., 1996. Low-Flow (Minimal Drawdown) Groundwater Sampling Procedures, U.S. EPA /540/S-95/504
- Washington State Department of Ecology (Ecology), 2001. *Model Toxics Control Act Cleanup Regulation*, Chapter 173-340 WAC. Publication No. 94-06

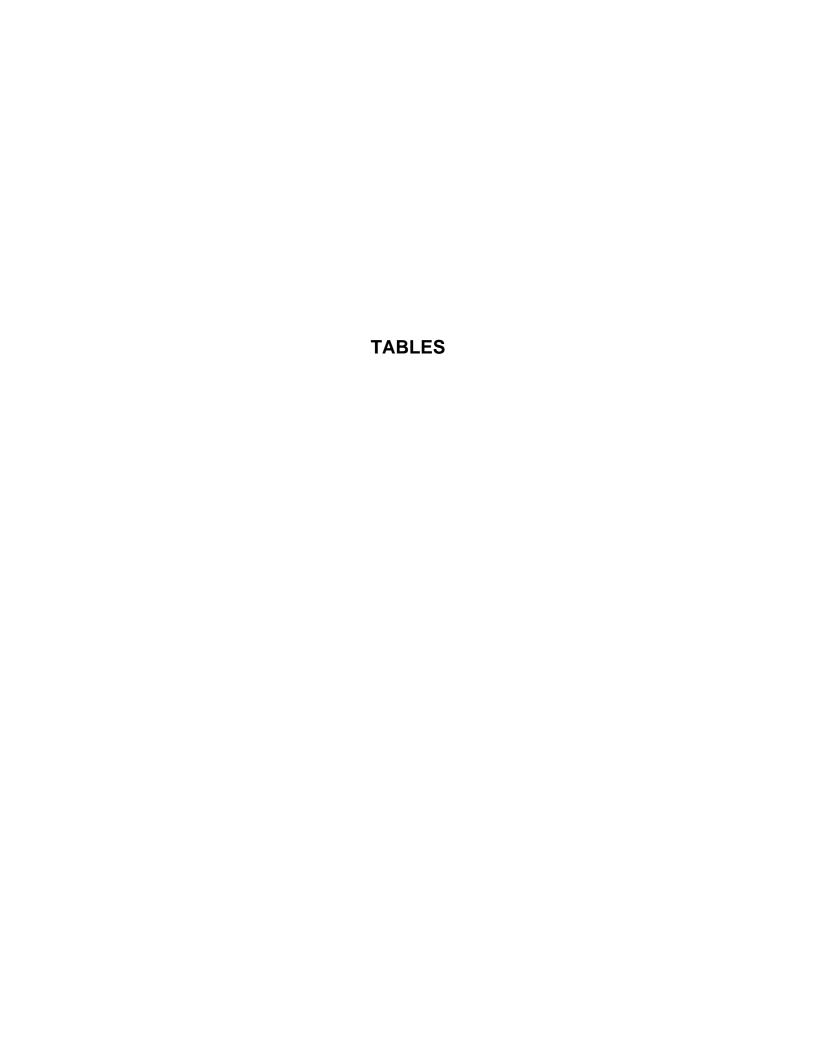


Table 1. Method Detection and Reporting Limits for Soil Samples

Specific Method	Analyte	MDL	MRL	Units
SW846 8260B	Acetone	0.0250	0.0500	mg/kg
SW846 8260B	Benzene	0.000670	0.00200	mg/kg
SW846 8260B	Bromobenzene	0.000670	0.00200	mg/kg
SW846 8260B	Bromochloromethane	0.00102	0.00200	mg/kg
SW846 8260B	Bromodichloromethane	0.000400	0.00200	mg/kg
SW846 8260B	Bromoform	0.000670	0.00200	mg/kg
SW846 8260B	Bromomethane	0.000640	0.00200	mg/kg
SW846 8260B	2-Butanone	0.0170	0.0500	mg/kg
SW846 8260B	sec-Butylbenzene	0.000670	0.00200	mg/kg
SW846 8260B	n-Butylbenzene	0.000670	0.00200	mg/kg
SW846 8260B	tert-Butylbenzene	0.000670	0.00200	mg/kg
SW846 8260B	Carbon disulfide	0.000670	0.00500	mg/kg
SW846 8260B	Carbon Tetrachloride	0.000670	0.00200	mg/kg
SW846 8260B	Chlorobenzene	0.000670	0.00200	mg/kg
SW846 8260B	Chlorodibromomethane	0.000380	0.00200	mg/kg
SW846 8260B	Chloroethane	0.000420	0.00500	mg/kg
SW846 8260B	Chloroform	0.000670	0.00200	mg/kg
SW846 8260B	Chloromethane	0.00100	0.00200	mg/kg
SW846 8260B	2-Chlorotoluene	0.000670	0.00200	mg/kg
SW846 8260B	4-Chlorotoluene	0.000670	0.00200	mg/kg
SW846 8260B	1,2-Dibromo-3-chloropropane	0.00340	0.00500	mg/kg
SW846 8260B	1,2-Dibromoethane (EDB)	0.00540	0.00200	mg/kg
SW846 8260B	Dibromomethane	0.000320	0.00200	mg/kg
SW846 8260B	1,4-Dichlorobenzene	0.00070	0.00200	
SW846 8260B	1,3-Dichlorobenzene	0.000720	0.00200	mg/kg
				mg/kg
SW846 8260B SW846 8260B	1,2-Dichlorobenzene Dichlorodifluoromethane	0.000430	0.00200	mg/kg
		0.00160	0.00200	mg/kg
SW846 8260B	1,1-Dichloroethane	0.000670	0.00200	mg/kg
SW846 8260B	1,2-Dichloroethane	0.000670	0.00200	mg/kg
SW846 8260B	cis-1,2-Dichloroethene	0.000670	0.00200	mg/kg
SW846 8260B	1,1-Dichloroethene	0.000670	0.00200	mg/kg
SW846 8260B	trans-1,2-Dichloroethene	0.000670	0.00200	mg/kg
SW846 8260B	1,3-Dichloropropane	0.000450	0.00200	mg/kg
SW846 8260B	1,2-Dichloropropane	0.000670	0.00200	mg/kg
SW846 8260B	2,2-Dichloropropane	0.000780	0.00200	mg/kg
SW846 8260B	cis-1,3-Dichloropropene	0.000670	0.00200	mg/kg
SW846 8260B	trans-1,3-Dichloropropene	0.000670	0.00200	mg/kg
SW846 8260B	1,1-Dichloropropene	0.000670	0.00200	mg/kg
SW846 8260B	Ethylbenzene	0.000670	0.00200	mg/kg
SW846 8260B	Hexachlorobutadiene	0.000630	0.00500	mg/kg
SW846 8260B	2-Hexanone	0.0170	0.0500	mg/kg
SW846 8260B	Isopropylbenzene	0.000670	0.00200	mg/kg
SW846 8260B	p-Isopropyltoluene	0.000670	0.00200	mg/kg
SW846 8260B	Methyl tert-Butyl Ether	0.000670	0.00200	mg/kg
SW846 8260B	Methylene Chloride	0.00200	0.0100	mg/kg
SW846 8260B	4-Methyl-2-pentanone	0.00290	0.0500	mg/kg
SW846 8260B	Naphthalene	0.00170	0.00500	mg/kg
SW846 8260B	n-Propylbenzene	0.000670	0.00200	mg/kg
SW846 8260B	Styrene	0.000670	0.00200	mg/kg
SW846 8260B	1,1,1,2-Tetrachloroethane	0.000670	0.00200	mg/kg
SW846 8260B	1,1,2,2-Tetrachloroethane	0.000670	0.00200	mg/kg
SW846 8260B	Tetrachloroethene	0.000400	0.00200	mg/kg
SW846 8260B	Toluene	0.000400	0.00200	mg/kg

Table 1. Method Detection and Reporting Limits for Soil Samples

-				
SW846 8260B	1,2,3-Trichlorobenzene	0.000920	0.00200	mg/kg
SW846 8260B	1,2,4-Trichlorobenzene	0.00102	0.00200	mg/kg
SW846 8260B	1,1,2-Trichloroethane	0.00111	0.00500	mg/kg
SW846 8260B	1,1,1-Trichloroethane	0.000400	0.00200	mg/kg
SW846 8260B	Trichloroethene	0.000830	0.00200	mg/kg
SW846 8260B	Trichlorofluoromethane	0.000670	0.00200	mg/kg
SW846 8260B	1,2,3-Trichloropropane	0.00103	0.00200	mg/kg
SW846 8260B	1,3,5-Trimethylbenzene	0.000400	0.00200	mg/kg
SW846 8260B	1,2,4-Trimethylbenzene	0.000420	0.00200	mg/kg
SW846 8260B	Vinyl chloride	0.000820	0.00200	mg/kg
SW846 8260B	o-Xylene	0.000670	0.00200	mg/kg
SW846 8260B	m,p-Xylene	0.000670	0.00300	mg/kg
SW846 8260B	Xylenes, total	0.00130	0.00500	mg/kg
SW846 8260B	Diisopropyl Ether	0.000670	0.00200	mg/kg
SW846 8260B	1,2-Dichloroethene (total)	0.00144	0.00200	mg/kg
SW846 8260B	1,1,2-Trifluorotrichloroethane	0.000590	0.00200	mg/kg
	, ,			<u> </u>
SW846 8270D SIM	Acenaphthene	0.000300	0.00333	mg/kg
SW846 8270D SIM	Acenaphthylene	0.000400	0.00333	mg/kg
SW846 8270D SIM	Anthracene	0.000700	0.00333	mg/kg
SW846 8270D SIM	Benzo (a) anthracene	0.000300	0.00333	mg/kg
SW846 8270D SIM	Benzo (a) pyrene	0.000400	0.00333	mg/kg
SW846 8270D SIM	Benzo (b) fluoranthene	0.00160	0.00333	mg/kg
SW846 8270D SIM	Benzo (g,h,i) perylene	0.000300	0.00333	mg/kg
SW846 8270D SIM	Benzo (k) fluoranthene	0.000300	0.00333	mg/kg
SW846 8270D SIM	Chrysene	0.000600	0.00333	mg/kg
SW846 8270D SIM	Dibenz (a,h) anthracene	0.000400	0.00333	mg/kg
SW846 8270D SIM	Fluoranthene	0.000400	0.00333	mg/kg
SW846 8270D SIM	Fluorene	0.000400	0.00333	mg/kg
SW846 8270D SIM	Indeno (1,2,3-cd) pyrene	0.000300	0.00333	mg/kg
SW846 8270D SIM	1-Methylnaphthalene	0.000300	0.00333	mg/kg
SW846 8270D SIM		0.000400	0.00333	
SW846 8270D SIM	2-Methylnaphthalene	0.000400	0.00333	mg/kg
SW846 8270D SIM	Naphthalene Phenanthrene	0.000700	0.00333	mg/kg
				mg/kg
SW846 8270D SIM	Pyrene	0.000300	0.00333	mg/kg
NIM/TOLL Dv	TDLL Discal Dangs by NWTDLL Dy (CCT)	2.00	4.00	
NWTPH-Dx	TPH - Diesel Range by NWTPH-Dx (SGT)	2.00	4.00	mg/kg
NWTPH-Dx	TPH - Oil Range by NWTPH-Dx (SGT)	2.00	4.00	mg/kg
NIMTDI I CV	TOU NIMTOU CV	0.500	F 00	
NWTPH-Gx	TPH - NWTPH-Gx	0.500	5.00	mg/kg
C/MO46 4244/6040D	Aroonio TCLD SW 6040D	0.0400	0.400	m a /I
SW846 1311/6010B	Arsenic TCLP SW 6010B	0.0400	0.100	mg/L
SW846 1311/6010B	Barium TCLP SW 6010B	0.0100	0.100	mg/L
SW846 1311/6010B	Cadmium TCLP SW 6010B	0.00600	0.0100	mg/L
SW846 1311/6010B	Chromium TCLP SW 6010B	0.0260	0.0500	mg/L
SW846 1311/6010B	Lead TCLP SW 6010B	0.0210	0.0500	mg/L
SW846 1311/6010B	Selenium TCLP SW 6010B	0.0390	0.100	mg/L
SW846 1311/6010B	Silver TCLP SW 6010B	0.0280	0.0500	mg/L
SW846 1311/7470A	Mercury TCLP 7470A	0.00100	0.0100	mg/L
0141040 00405		0.700	4.60	,
SW846 6010B	Arsenic Total EPA 6010B	0.700	1.00	mg/kg
SW846 6010B	Barium Total EPA 6010B	0.100	2.00	mg/kg
SW846 6010B	Cadmium Total EPA 6010B	0.200	1.00	mg/kg
SW846 6010B	Chromium Total EPA 6010B	0.500	1.00	mg/kg

Table 1. Method Detection and Reporting Limits for Soil Samples

SW846 6010B	Lead Total EPA 6010B	0.400	1.00	mg/kg
SW846 6010B	Selenium Total EPA 6010B	0.700	2.00	mg/kg
SW846 6010B	Silver Total EPA 6010B	0.500	1.00	mg/kg
SW846 7471A	Mercury 7471A	0.0400	0.100	mg/kg
SW846 7196A	Chromium, Hexavalent by EPA 7196A	1.70	2.00	mg/kg

TPH = Total Petroleum Hydrocarbon

EPA = U. S. Environmental Protection Agency

mg/kg = milligram per kilogram

mg/L = milligram per liter

MDL = method detection limit

MRL = method reporting limit

Table 2. Method Detection and Reporting Limits for Groundwater Samples

Specific Method	Analyte	MDL	MRL	Units
SW846 8260B	Benzene	0.410	1.00	ug/L
SW846 8260B	Ethylbenzene	0.350	1.00	ug/L
SW846 8260B	Toluene	0.350	1.00	ug/L
SW846 8260B	o-Xylene	0.330	1.00	ug/L
SW846 8260B	m,p-Xylene	0.400	2.00	ug/L
NWTPH-Dx	Diesel	28.0	100	ug/L
NWTPH-Dx	Motor Oil	28.0	100	ug/L
NWTPH-Gx	GRO (C4-C12) NW	40.0	100	ug/L
SW846 6010B	Arsenic Total EPA 6010B	0.00360	0.0100	mg/L
SW846 6010B	Barium Total EPA 6010B	0.00100	0.0100	mg/L
SW846 6010B	Cadmium Total EPA 6010B	0.000600	0.00100	mg/L
SW846 6010B	Chromium Total EPA 6010B	0.00260	0.00500	mg/L
SW846 6010B	Lead Total EPA 6010B	0.00210	0.00500	mg/L
SW846 6010B	Selenium Total EPA 6010B	0.00390	0.0100	mg/L
SW846 6010B	Zinc Total EPA 6010B	0.00500	0.0500	mg/L
SW846 7470A	Mercury Total 7470A	0.000100	0.000200	mg/L

TPH = Total Petroleum Hydrocarbon

EPA = U. S. Environmental Protection Agency

mg/L = milligram per liter $\mu/L = microgram per liter$ MDL = method detection limitMRL = method reporting limit

ExxonMobil/ADC Everett Facility Project No.: 0-915-15716-D

Table 3 Soil and Groundwater Samples

Boring Number	City of Everett Trench Station Number	Trench Depth (ft bgs)	Drilling Method	Boring Depth (ft bgs)	Depth of Sampling (ft bgs)	Number of Soil Samples	Number of Groundwater Samples
CE-1	20+02	7.9	HSA	8	8	2	1
CE-2	18+00	7.5	HSA	20	8	3	1
CE-3	17+00	7.6	HSA	8	8	2	1
CE-4	15+50	6.75	HSA	7	7	2	1
CE-5	14+00	8	HSA	20	8	2	1
Duplicate samples						2	1
Total Samples						13	6

Duplicate samples will be collected from intervals exhibiting evidence of potential contamination, such as staining or odor.

ft bgs = feet below ground surface

HSA = hollow-stem auger

Table 4 Sample Containers, Preservation and Storage

Analysis	Method	Sample Container	Number of Containers	Preservation and Storage	Holding Times
Soil					
Gasoline Range Organics	NWTPH-Gx	40-mL vial (VOA) w/MeOH	1	4° C	14 days
Diesel Range Organics ¹	NWTPH-Dx	4 oz. CWM jar with PTFE lid	1	4° C	14 days
Volatile Organic Compounds	EPA 8260B	40-mL vial (VOA) w/stir bar ²	2	4° C	14 days
Polycyclic Aromatic Hydrocarbons	EPA 8270D	4 oz. CWM jar with PTFE lid	1	4° C	14 days
Metals	EPA 6010/6020	4 oz. CWM jar with PTFE lid	1	4° C	6 months
Mercury (Hg)/Hexavalent Chromium (CrVI)	EPA 7471/7196	4 oz. CWM jar with PTFE lid	1	4° C	28 days
Water		•			
Gasoline Range Organics	NWTPH-Gx	40-mL vial (VOA) w/HCI	1	HCl pH<2, 4° C	14 days
Diesel Range Organics ¹	NWTPH-Dx	4 oz. CWM jar with PTFE lid	1	4° C	14 days
ВТЕХ	EPA 8260B	40-mL vial (VOA) w/HCl	2	4° C	14 days
Metals (total)	EPA 200.7/200.8	500-mL HDPE	1	HNO ₃ pH<2, 4° C	6 months
Mercury (Hg)	EPA 7470	500-mL HDPE	1	4° C	28 days
рН	EPA 150.1/9040	60-mL HDPE	1	4° C	ASAP

1. Silica gel cleanup will be performed on samples

2. Sample volume = 5 ounces

NW TPH = Northwest Tptal Petroleum Hydrocarbon

EPA = U. S. Environmental Protection Agency

CWM jar = Clear, wide-mouth glass jar

HCI = Hydrochloric acid

MeOH = Methanol

BTEX = benzene, toluene, ethylbenzene, total xylene

NaOH = sodium hydroxide

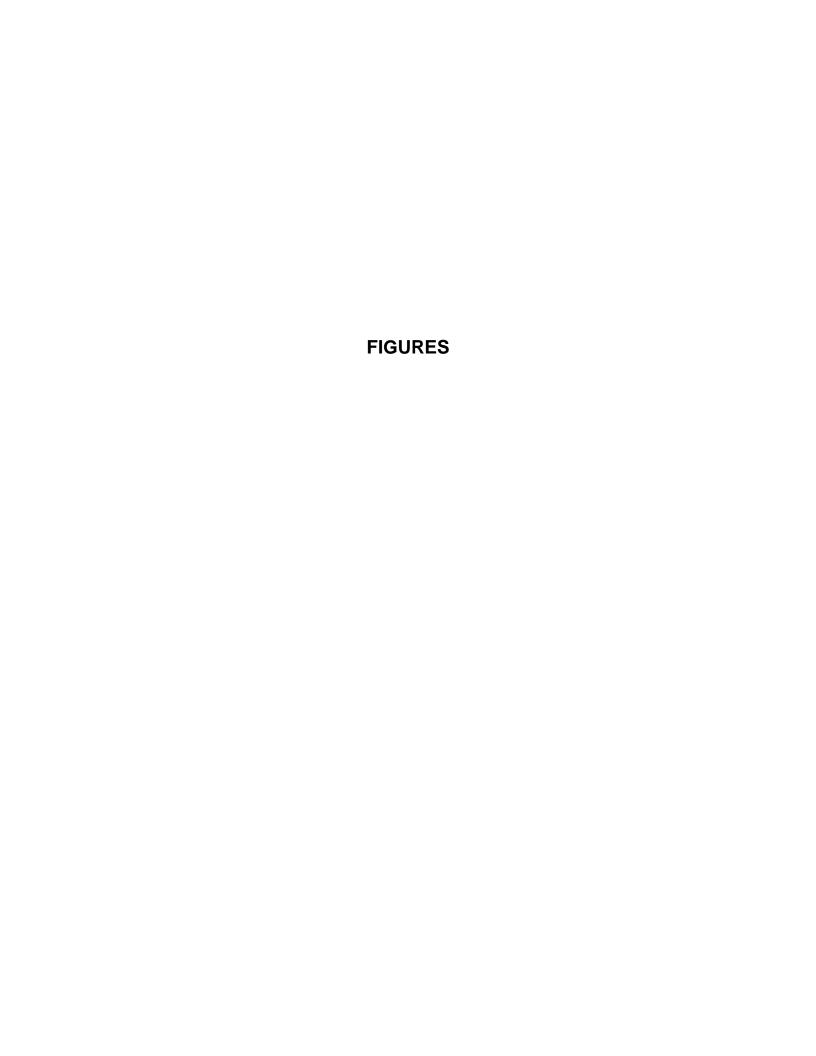
HNO3 = Nitric Acid

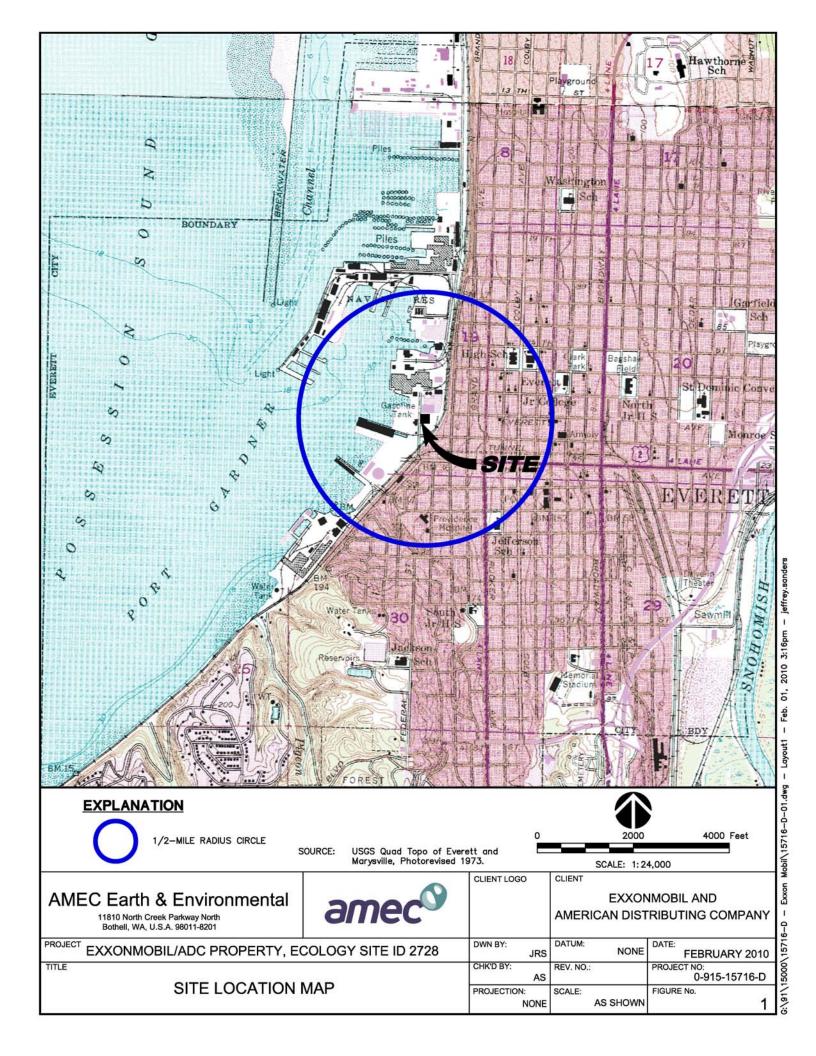
HDPE - High Density Polyethylene

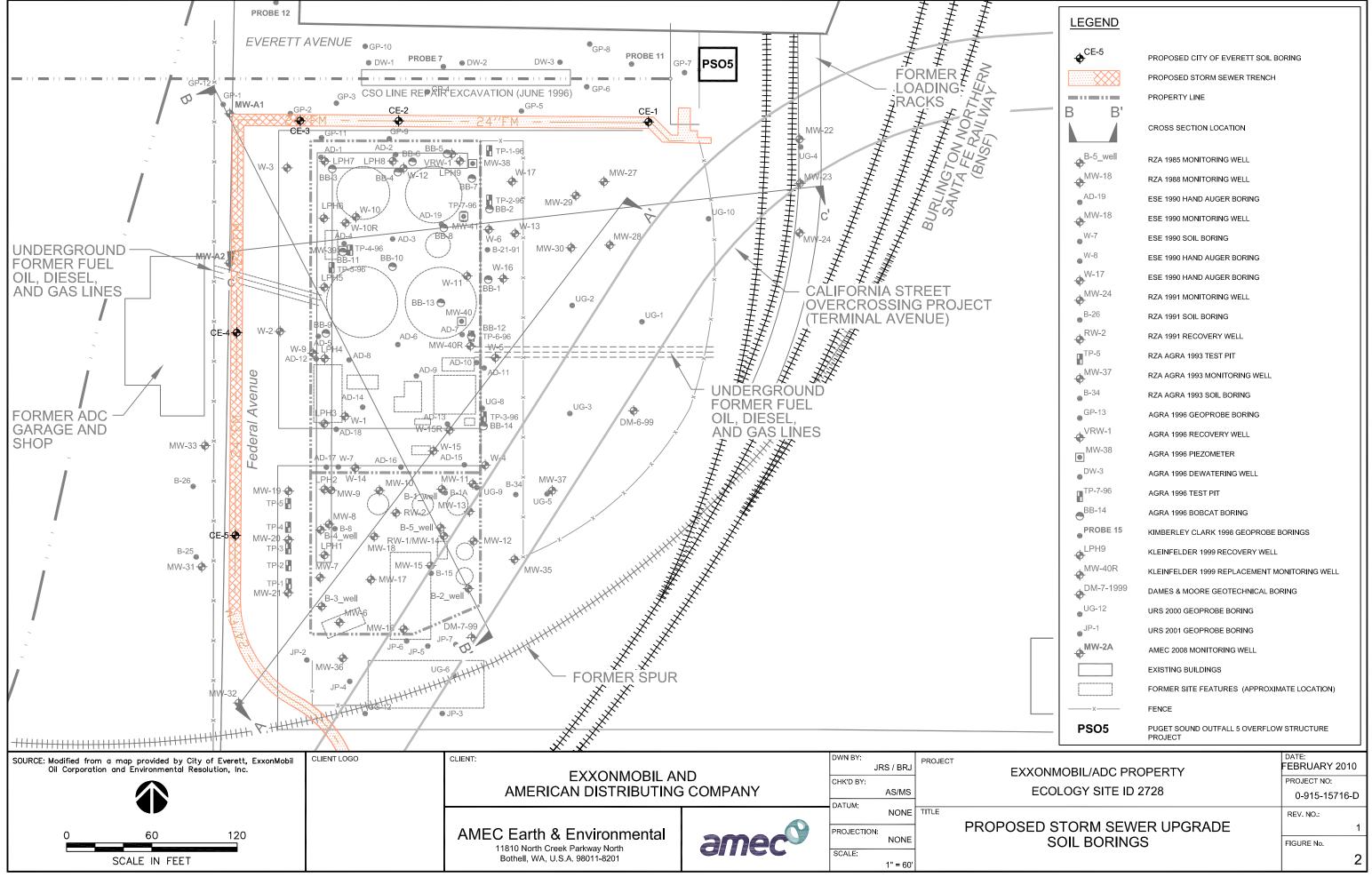
PTFE = teflon

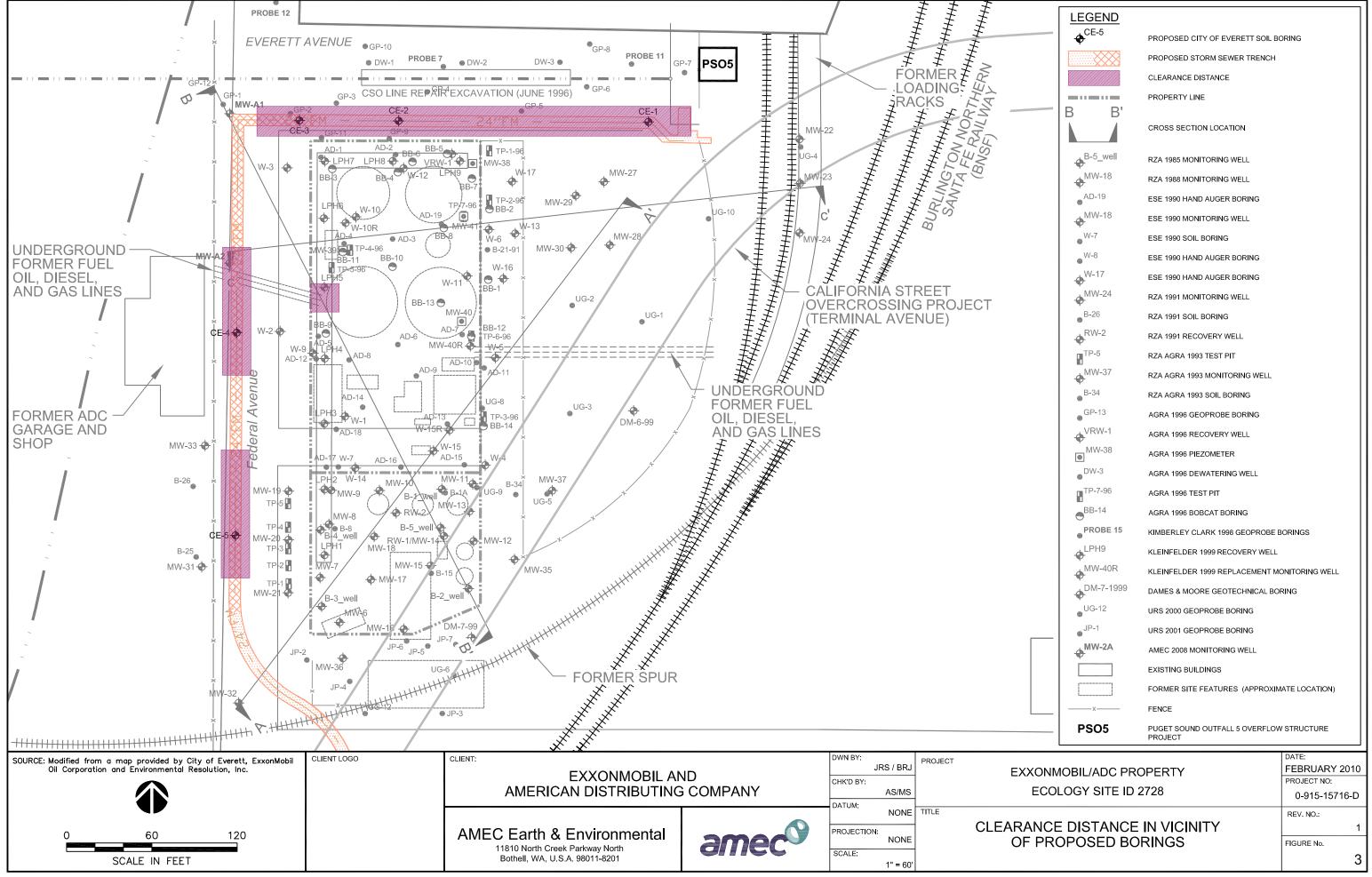
VOA = volatile organic analysis

mL = milliliter



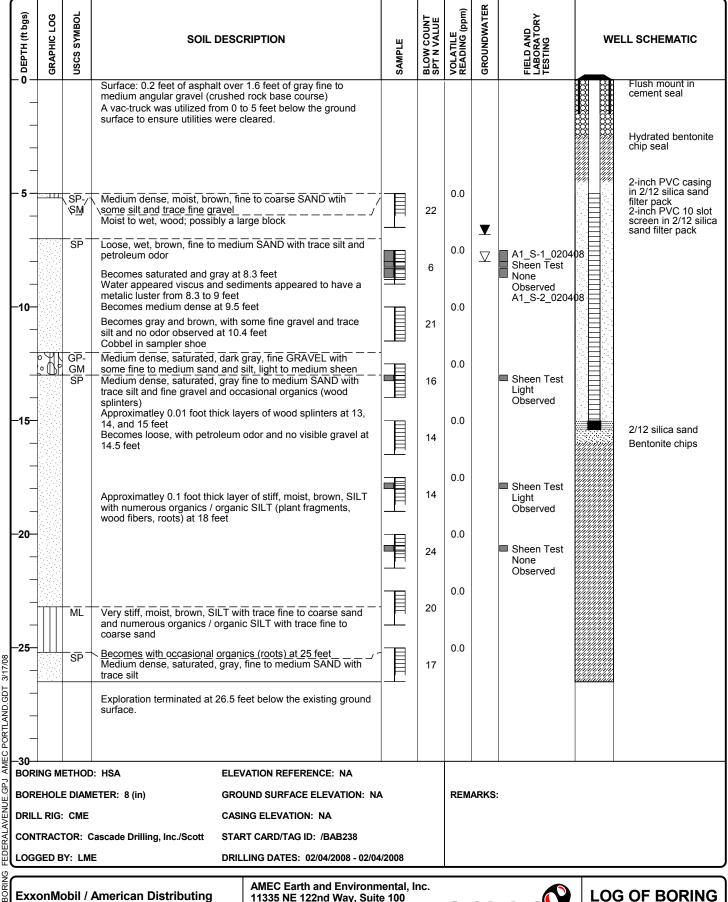






ATTACHMENT A1

Boring Logs for MW-A1 and MW-A2



ExxonMobil / American Distributing Company

7-915-15716-B

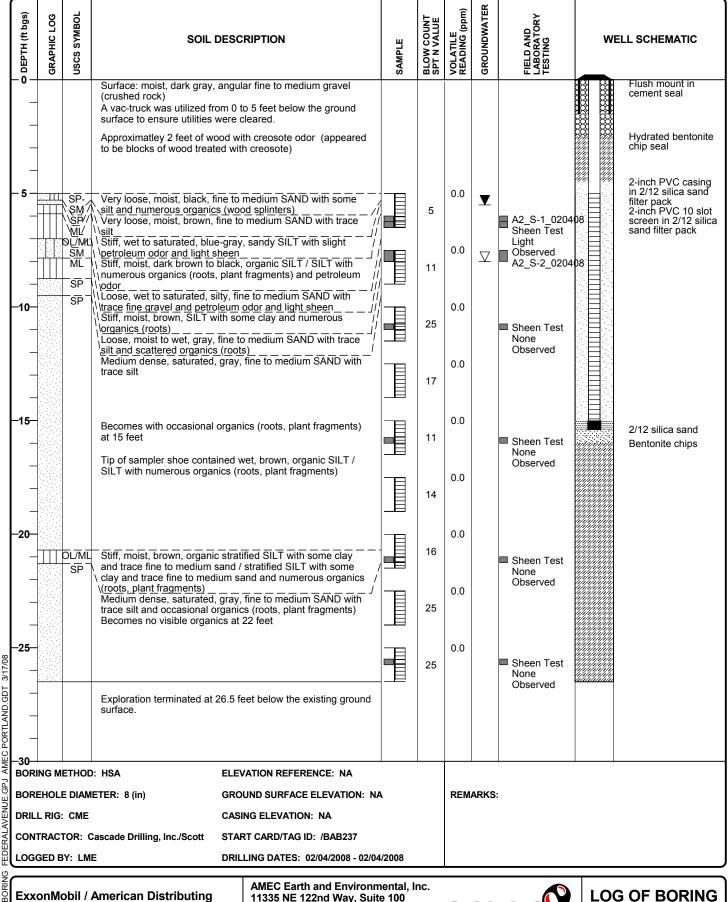
AMEC Earth and Environmental, Inc. 11335 NE 122nd Way, Suite 100 Kirkland, Washington USA 98034 Tel (425) 820-4669

Fax (425) 821-3914



LOG OF BORING MWA1

PAGE 1 OF 1



ExxonMobil / American Distributing Company

7-915-15716-B

AMEC Earth and Environmental, Inc. 11335 NE 122nd Way, Suite 100 Kirkland, Washington USA 98034 Tel (425) 820-4669

Fax (425) 821-3914



LOG OF BORING MWA2

PAGE 1 OF 1

ATTACHMENT A2

Site-Specific Health and Safety Plan





Site Safety Plan: Updated 02.10.10 Project Number: 0-915-15716-D page 1

Project Name: ExxonMobil / ADC Property, Ecology Site ID 2728, Everett, WA

SITE SPECIFIC HEALTH AND SAFETY PLAN

Project Name: ExxonMobil/ADC Property, Ecology Site ID 2728 Project Location: 2717/2731 Federal Avenue, Everett, Washington

Project Number: 9-91-51571-6C

THIS SITE SPECIFIC HEALTH AND SAFETY PLAN APPLIES ONLY TO AMEC PERSONNEL.

All site personnel must have completed the 8-hour ExxonMobil LPS Training prior to undertaking any field work at the site.

A PRE-ENTRY BRIEFING MUST BE HELD PRIOR TO INITIATING ANY SITE ACTIVITY AND AT OTHER TIMES AS NECESSARY TO ENSURE EMPLOYEES ARE APPRAISED OF THE SITE HEALTH AND SAFETY PLAN.

SAFETY PERSONNEL:

Health and Safety Coordinators: Leah Vigoren and Anastasia Speransky

Project Engineers: Leah Vigoren

Project Managers: Meg Strong and Gary Dupuy

Site Safety Coordinator (SSC): Leah Vigoren

Joe Abel: ExxonMobil Environmental Services (EMES) Client Contact:

EMERGENCY CONTACTS:

Hospital / Emergency Room: **Providence Medical Center** 425-258-7555

Map showing shortest route to Hospital is attached to this document.

911 Fire: Police: 911 Poison Control Center: 1-800-222-1222 Emergency Water Shut-off: Everett 1-425-257-8821 Electric Utility: Snohomish County PUD 1-877-783-1000 Washington State Patrol: 911

Health and Safety Coordinator: Leah Vigoren (Cell Phone: 206-351-9449) 206-342-1760 (w) Project Manager: Meg Strong (Cell Phone: 425-864-2096) 425-368-0966 (w)

AMEC Earth & Environmental, Inc. 11810 North Creek Parkway Bothell, Washington USA 98011 (425) 368-1000 Phone (425) 368-1001 Facsimile





SITE HISTORY

The approximate 1-acre site was purchased by ExxonMobil's historic predecessors in 1922, and was utilized as a petroleum bulk storage distribution facility between 1922 and 1974. In 1974, the then Mobile Company sold two thirds of the site (northern portion) to A.P. Miller (Miller), for use by the American Distributing Company (ADC). In 1987, Mobile discontinued petroleum storage and dispensing operations on their portion of the site and removed all storage tanks and ancillary equipment. In 1990, petroleum distribution was discontinued on the ADC parcel, and some improvements and tanks were removed from the parcel. Since then, the site has been turned into a parking lot and is leased to the Kimberly Clark facility located to the north of the site. Activities that have occurred on the site since this time have been environmental investigations and remedial activities to address petroleum impacts to soil and groundwater.

In 1985, site characterization activities were initiated to define the nature and extent of petroleum impacts beneath the site. Between 1988 and 1996, a variety of Interim Remedial Action Measures (IRAMs) were implemented to address the free product. In 1998, a Remedial Investigation/Focused Feasibility Study (RI/FFS) was performed in coordination of the Washington State Department of Ecology (Ecology) under the Consent Order. Remedial Action Objectives (RAOs) were developed for the site based on the RI data and baseline human health risk assessment. The remedy selected to achieve RAOs included the following.

- Construction of an interceptor trench along the down gradient margins of the site (entire western and northern boundaries) to mitigate the off-site migration of the light non-aqueous phase liquid (LNAPL) present on the shallow water table.
- 2) Placement of low-permeability cap across the entire site surface
- 3) Ongoing removal and disposal of recovered LNAPL from site monitoring wells and interceptor trench; and
- 4) Quarterly groundwater monitoring.

In addition, the City of Everett is planning to upgrade the storm sewer line that will result in trenching within Everett Avenue and Federal Avenue. In advance of trenching, samples of the soil and groundwater will be collected from borings to determine soil and groundwater disposal options. This HASP addresses the specific field sampling activities related to the advancement of the soil borings and soil and groundwater sampling.

ORGANIZATIONAL STRUCTURE

Project Manager(s):

Gary Dupuy (phone number 206-342-1777) and Meg Strong (phone number 425-368-0966) are the client managers for the project. Responsibilities include remaining in contact with regulatory agencies such as the Department of Ecology, overseeing the Project and ensuring client satisfaction from commencement to closeout.

Site Safety and Health Supervisor:

Leah Vigoren (phone number 206-838-8470) is the Project Manager and Health and Safety Coordinators (HSC). Primarily the duties of the HSC entail coordination with the Project Manager for preparation of site health and safety plans, assessment of chemical hazards and selection of safety / monitoring equipment.

Anastasia Speransky (phone number 206-838-1776) is the field geologist and is the Site Safety Coordinator (SSC). The SSC has the responsibility of implementing the Site Health and Safety Plan while at the Site. The SSC / HSC will be involved with the Project Manager in preparation of the Site Health and Safety Plan. If the plan is not being implemented or if unanticipated situations arise, the SSC / HSC may stop all proceedings and see that all personnel depart the site. The SSC / HSC will have charge of all instruments and see to their proper use and function.





Field Technicians:

Joseph C. Petrick is the Field Technician whose responsibilities include collecting soil and groundwater samples, keeping field records (I.e. Daily Field Logs) describing field activities, observations and site events. Supplying daily reports and reporting all incidents to the Project Engineer.

Subcontractor

Drilling company "Cascade Drilling, Inc." is responsible for the advancement of soil borings on the site.

ON SITE TASKS

Soil and groundwater will be characterized beneath Everett Avenue and Federal Avenue for disposal classification. Elements of this addendum are based on the Washington Administrative Code (WAC) Ecology Model Toxics Control Act (MTCA) Cleanup Regulations WAC 173-340-820 and City of Everett Waste Water discharge regulations.

The soil and groundwater sampling will include the following activities:

- 1. Advance five borings (three along Everett Avenue and two along Federal Avenue [Figure 2]) to evaluate the concentration of chemicals in soil and groundwater. The borings will be advanced at each location using a hollow stem auger (HSA) drill rig to the total depth of the proposed trench at the location of each boring. Two of the borings will be terminated at a minimum depth of 20 feet below ground surface (bgs) to provide soil lithology information for the City's geotechnical engineer.
- Collect continuous samples from the borings using a standard penetration test (SPT) and a split spoon (SS).
- 3. Collect two to three composite soil samples from each boring for laboratory analyses. The first composite will be from the top four feet and the second from the lower four feet. Discreet samples for volatile organic compounds (VOC) analysis will be collected from the upper four feet and at regular intervals to the base of the boring. In areas where heavy contamination such as free product is observed a separate sample will be collected.
- 4. Collect "grab" water samples from each boring. If sheen or product is encountered, an additional water sample will be collected from just below the water table (a foot or two below).
- 5. Soil samples will be analyzed for CEMEX acceptance criteria and "grab" groundwater samples will be analyzed for the City of Everett sanitary sewer discharge criteria. The soil and groundwater samples will be performed on a one-week turn-around schedule.

SAFETY & HEALTH HAZARDS ANALYSIS

a) Physical Hazards

Physical hazards that may be encountered during site activities include noise, manual lifting, powerful moving parts and weather related hazards (cold, heat stress, wind). Hard hats, safety glasses, hearing protection and steel-toed boots will be required for all personnel working in the vicinity of heavy equipment.

Identified hazards may be mitigated by using safe work practices at all times. The SSC has total responsibility for ensuring that all AMEC personnel on-site perform work tasks in a safe and sensible manner. If at any time the SSC determines that safe work practices are not followed, the tasks will be suspended and corrective actions will be taken.

Because of the potential of explosion hazard presented during groundwater monitoring (i.e., W-2) **SMOKING WILL NOT BE ALLOWED WITHIN 50 FEET OF THE WORK ZONE.**





The following are all additional site related hazards:

1) Traffic

- a. Cones will be set out around the work area and safety reflective vests will be worn.
- b. All drilling will be conducted with the traffic control.

2) Personnel or property damage from vehicle movement.

- a. When moving vehicles the following precautions must be taken
- b. Equipment must be stowed and secured
- c. A spotter must be used due to the presence of blind spots in the driver's field of vision.
- d. The spotter must identify any surface obstruction / anomalies
- e. Audible warning signals and hand signals must be used.
- f. Operator must yield to pedestrians.

3) Personal injury from handling heavy objects.

- Use proper lifting techniques; keeping back straight and lift with arms and legs; keep load near body; avoid reaching.
- b. Do not attempting to lift anything that weighs more than 60 pounds.
- c. Use mechanical equipment such as a cart to carry / lift large, heavy or awkward loads.

4) Slips, trips and falls.

- a. Scan area prior to start of work.
- b. Group all equipment and waste in one designated area.
- c. Return tools not in use to storage.

5) Pinch points on drum and well covers.

a. Personnel will wear leather gloves when working with well and drum covers.

6) Broken Glassware

- a. Personnel will use bubble wrap and blue ice when transporting samples in glass containers.
- b. Personnel will not overtighten caps on glass bottles.

b) Chemical Hazards

Chemical hazards that could possibly be encountered include Gasoline, BTEX, hydrogen sulfide (H₂S), and methane (CH₄). The nature of this project precludes continuous exposure to any potential contaminant.

Per past anecdotal evidence, monitoring well (MW) 30 occasionly has contained small amounts of hydrogen sulfide gas. In addition, during installation, well (W) 2 contained methane gas exceeding the lower explosive limit (LEL). AMEC will conduct air monitoring using a photoionization detector (PID) during drilling and sampling.

1) Personal Injury from chemical contact / exposure / inhalation.

- a. Inspect soil cuttings before handling with PID.
- b. AMEC personnel will place themselves upwind during drilling.

c) Biological Hazards

The project site is a flat graded parking lot which eliminates biological hazards.





page 5

Project Number: 0-915-15716-D

Site Safety Plan: Updated 02.10.10

Project Name: ExxonMobil / ADC Property, Ecology Site ID 2728, Everett, WA

TRAINING

All AMEC personnel will review the site specific Heath and Safety plan before accessing the site. Personnel onsite will also have current 40-Hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Certification.

Certificates of HAZWOPER completion will be maintained at the Bothell office and will be available to regulatory personnel upon request. All Personnel shall carry current 40-hour HAZWOPER training cards or appropriate paperwork while working onsite. The SSC / HSC shall be first aid and CPR trained.

In addition all site personnel must have completed the 8 hour ExxonMobil LPS Training prior to undertaking any field work.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

AMEC will wear Level D PPE which consists of steel-toed, chemical resistant rubber boots, inner glove of PVC or latex, outer gloves of Nitrile or equivalent, safety glasses, Tyvek coveralls, and a hard hat. During construction activities, minimal PPE hearing protection will consist of soft foam ear-bud style plugs.

MEDICAL SURVEILLANCE

Evidence of a current physical examination in the form of a letter from an examining physician will be maintained at the Bothell office and will be available to regulatory personnel upon request.

Air Monitoring

Air monitoring wil be conducted during drilling and soil sampling activities. AMEC will conduct initial air monitoring using a photoionization detector (PID). PID utilizes ultaviolet light to ionize gas molecules and is commonly employed in the detection of volatile organic compounds (VOCs). AMEC will ensure that the concentrations of VOCs are less than 5 parts per million (ppm) in breathing zone prior to proceeding with sampling. Each well will be continuously monitored during sampling. The PID will alarm if VOC concentrations exceed the levels required for breathing.

AMEC will calibrate the PID both pre and post site visits using Isobutylene calibration gas with compatible regulator.

Decontamination

Disposable PPE will be stored in a secured 55-gallon drum onsite. A certified waste transporter and disposal company will contacted to transport the drum for disposal in accordance with local, State, and Federal regulations at an offsite facility.

Site Control

AMEC personnel will be provided with a site map and be required to review the Health and Safety plan prior to entry into the site. A copy of this HASP shall be on hand at all times with emergency contact numbers and directions to the nearest medical facilities easily accessible. When necessary, cones, caution tape or a suitable alternative will be used to deny public access to the work area. Cones will also be used to define an exclusion zone redirecting motorists and pedestrians away from the work area.

In all emergencies AMEC is to document the action taken and notify the HSC. Project Manager and client official of the event and subsequent response.





In the Event of an Injury

If an injury is life-threatening, follow steps 1 though 8 below. If the injury is not life threatening, perform necessary first aid and consider the need for decontamination prior to transport. The SSC shall be first aid and CPR trained.

- 1) Perform first aid necessary to determine victim(s) medical status
- 2) Call emergency transport.
- 3) Give specific directions to location of emergency
- 4) Give phone from which you are calling;
- 5) Tell emergency services what happened. Inform that victim(s) may be wearing contaminated clothing.
- 6) Inform emergency services how many persons need help.
- 7) Inform emergency services what is being done for the victim(s)
- 8) Stay on telephone until told to hang up.

Transport to hospital, if possible.

Work Permits

Copies of the permits will be available onsite during drilling activities. Cascade Drilling will obtain start cards required for drilling from the Washington State Department of Ecology.

Security

No unauthorized persons will be allowed in the work zone. Unauthorized persons are those without appropriate training, without proof of medical surveillance, and those with no business on the site.

Confined Space Entry Procedures

AMEC will not be entering confined spaces at the Site.

Spill Containment Program

The site specific accidental spill / release action plan consists of the following:

- 1) Pick up, isolate, or contain spill;
- 2) Evacuate area, if necessary;
- 3) Contact emergency agencies, if necessary.

Incident Reporting Requirements

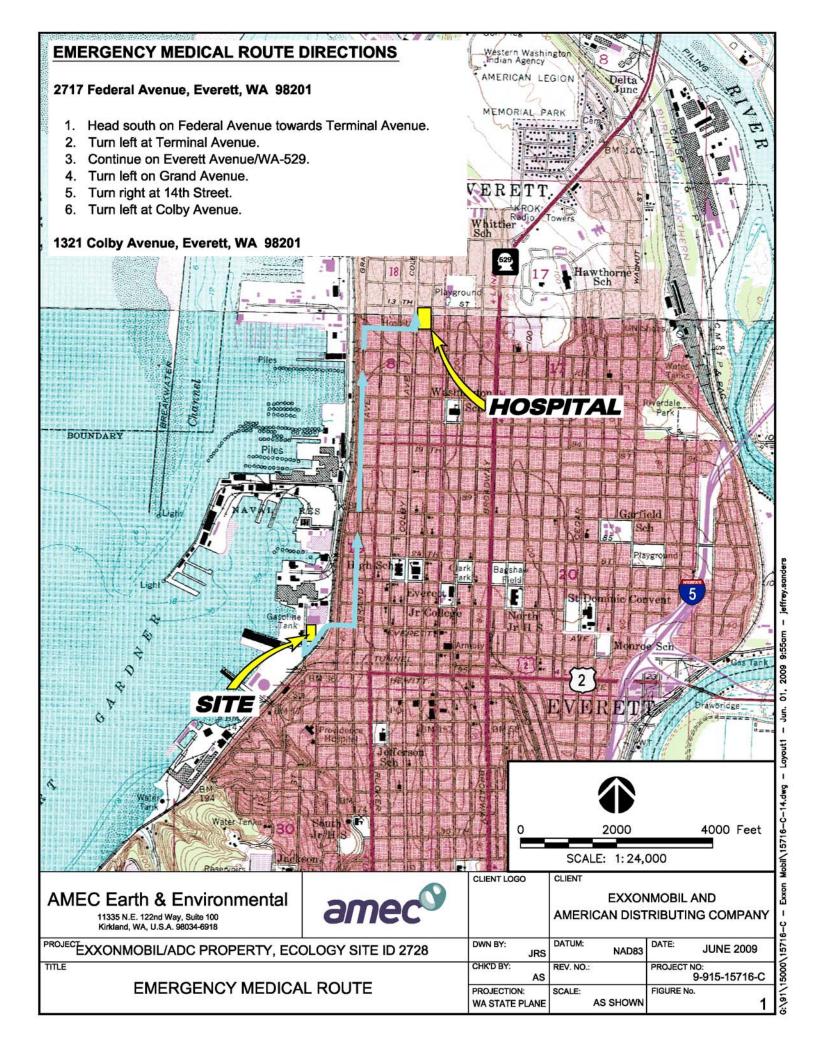
In all emergencies, document action taken and notify the HSC / SSC, Project Manager and client officials of occurrences.

AMEC will report all incidents and Near Loss Incidents (NLI) to the ExxonMobil contact within 24 hours of the occurrence along with a written report and the launching of an accident investigation.





Attendance/Sign-In (name, date)			
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	_		
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ATTACHMENT A3

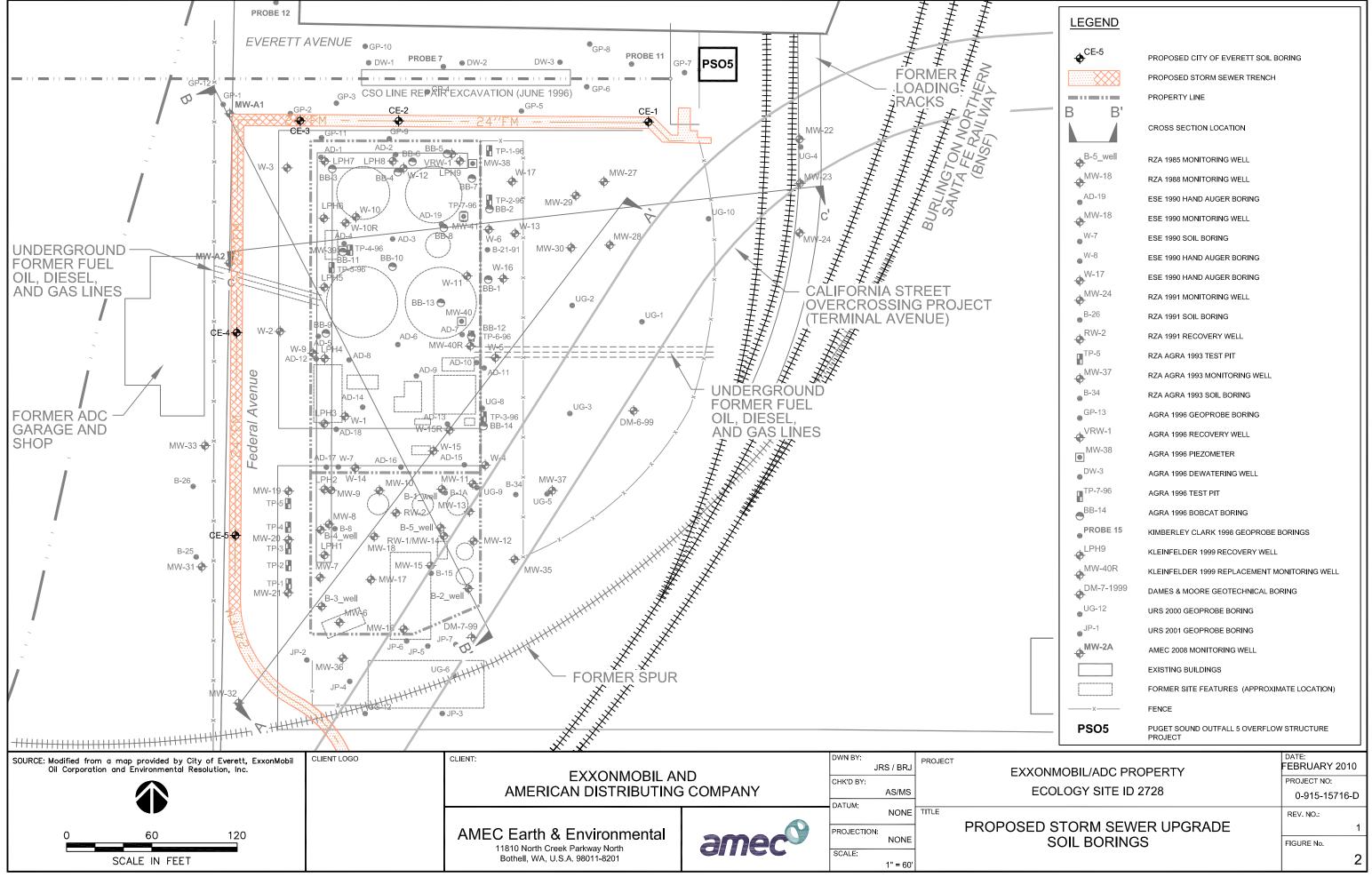
Street Use Permit Documentation

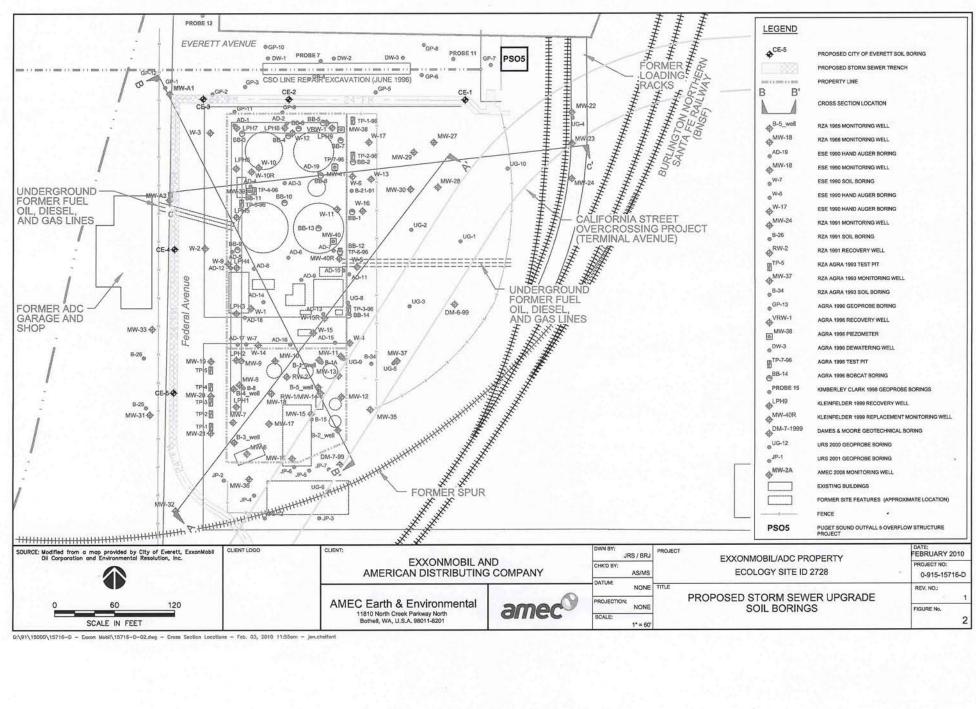


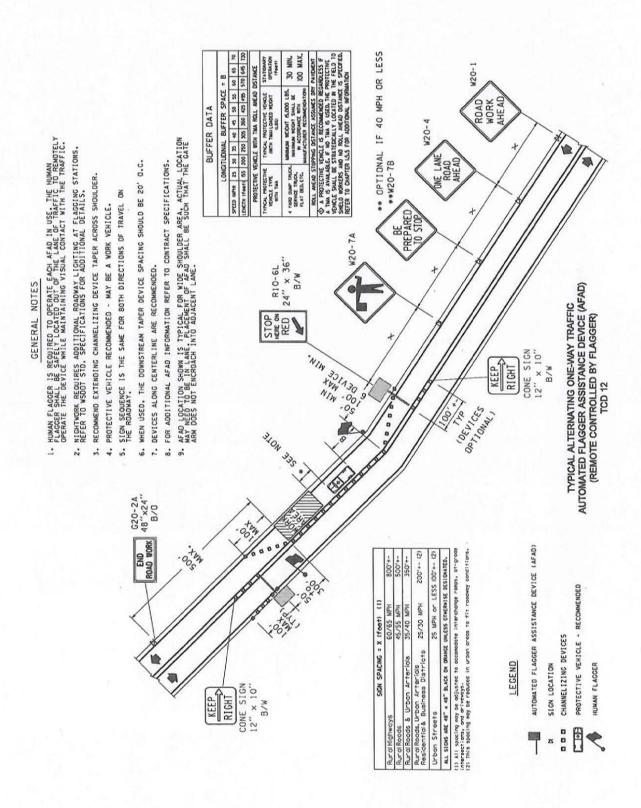
APPLICATION for PUBLIC WORKS PERMIT

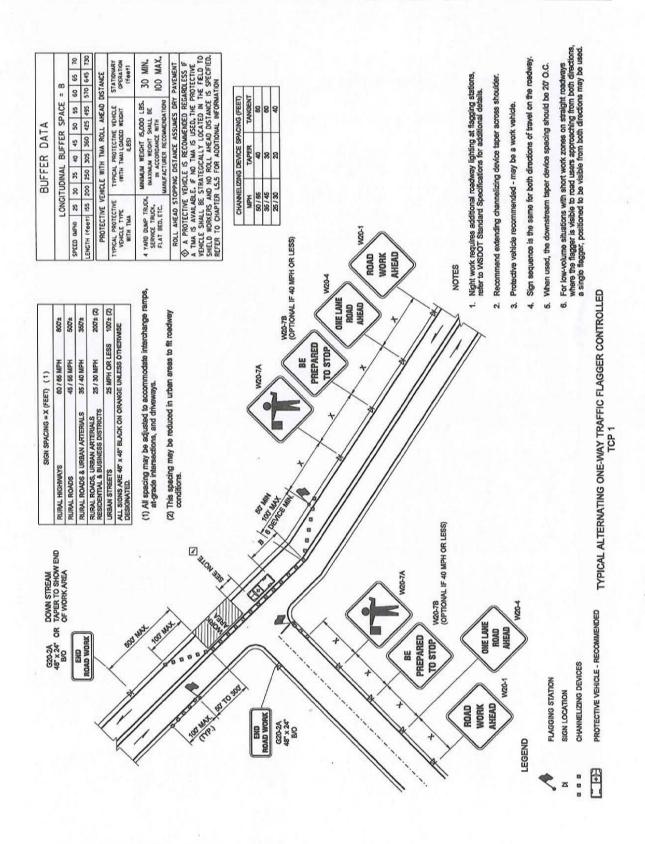
PUBLIC WORKS DEPARTMENT 3200 Cedar Street Everett, WA 98201 425 - 257-8810

			Date	02/03/2010
Mailing Address: 320	of Evenett 00 Coolar St., Tenett, WA 9 15-257-8810	Mailing Address:	Second	EC E & E / D. spend University St. 1e 1020, Scattle, W 8101 6)342-1760
Description of Work:	cetility up	grade upr	h. 9	the City of Event See STARched mork to be done) for
Site Address:	2717/2731 Fe	referal so,	Evere	
Comments from Inspe	ector during initial insp	ection:		
Approved for issuance	e by:		Date:	









ATTACHMENT A4

Field Documentation Forms



AMEC Earth & Environmental, Inc.

 11810 North Creek Parkway N
 Tel
 (425) 368-1000

 Bothell, Washington 98011
 Fax
 (425) 368-1001

DAILY FIELD REPORT

DDO IFOT NAME		DDO IEOT NO	FIELD DEDODE NO		
PROJECT NAME	PROJECT NO.	FIELD REPORT NO.			
Mobil/ADC Everett Facility		9915-15716-0			
ADDRESS		DATE	PAGE		
2717/2731 Federal Avenue			OF		
CITY OR COUNTY	PERMIT NO.	ARRIVAL TIME	DEPARTURE TIME		
Everett, WA					
CLIENT	AMEC PROJECT MANAGER	R/PHONE NO.			
ExxonMobil					
GENERAL CONTRACTOR	AMEC FIELD REPRESENTA	TIVE/ MOBILE NO.			
SUBCONTRACTOR	WEATHER				
TYPE OF WORK PERFORMED					
EQUIPMENT USED					

COMMENTS

AMEC (REV. 8/00)

SOIL BORING LOG

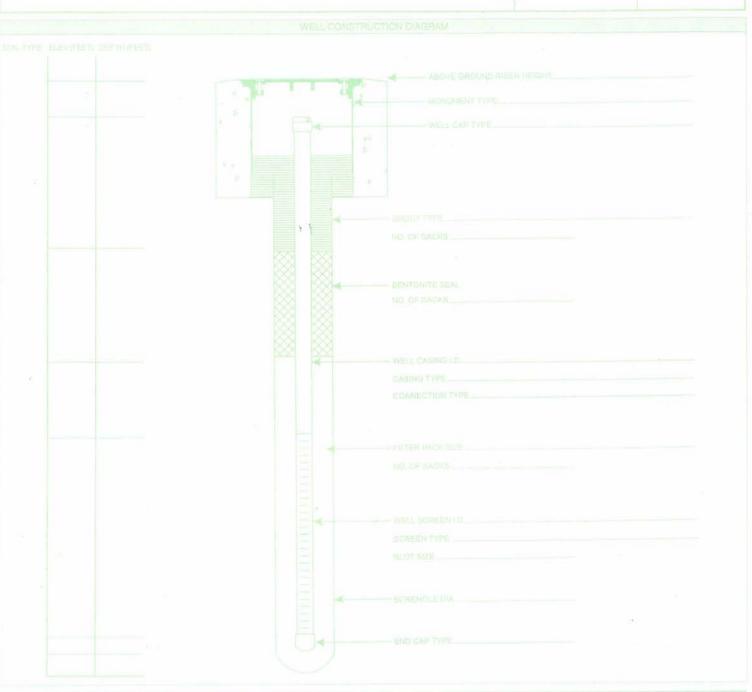


	28				
				^	



AS-BUILT WELL LOG

PROJECT NO. 1	
	DATE COMPLETED
INSTALLABOR THE	



DOMMENTS

11720 North Creek Parkway N Suite 400

Chain of Custody Record



phone 425.420.9200 fax 425.420.9210

Bothell, WA 98011 TestAmerica Laboratories, Inc. Date: COC No: **Client Contact** Project Manager: Leah Vigoren Site Contact: Leah Vigoren COCs Tel/Fax: (206) 838-8470 AMEC Earth & Environmental, Inc. Lab Contact: Carrier: of _ Job No. 600 University Street Suite 1020 **Analysis Turnaround Time** Seattle, WA 98101 Calendar (C) or Work Days (W) (206) 342-1760 Phone TAT if different from Below SDG No. (206) 342-1761 FAX 2 weeks Project Name: ExxonMobil/ADC 1 week Site: Everett 2 days PO# 9915-15716C 1 day Sample Sample Sample # of Date Time Sample Identification Type Matrix Cont. Sample Specific Notes: Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other Sample Disposal (A fee may be assessed if samples are retained longer than 1 month) Possible Hazard Identification Archive For_ Non-Hazard ☐ Flammable Unknown Skin Irritant Return To Client Disposal By Lab Months Poison B Special Instructions/OC Requirements & Comments: Send electronic data to leah.vigoren@amec.com Date/Time: Date/Time: Relinquished by: Company: Received by: Company: Relinquished by: Company: Date/Time: Received by: Company: Date/Time: Relinquished by: Date/Time: Date/Time: Company: Received by: Company:

APPENDIX F

Simplified Terrestrial Ecological Evaluation



Table 749-1 Simplified Terrestrial Ecological Evaluation-Exposure Analysis Procedure

Estimate the area of contiguous (connected) <u>undeveloped land</u> on the site or within 500 area of the site to the nearest 1/2 acre (1/4 acre if the area is less than 0.5 acre).	icci oi aliy
1) From the table below, find the number of points corresponding to the area and enter this number in the field to the right.	
Area (acres) Points 0.25 or less 4 0.5 5 1.0 6 1.5 7 2.0 8 2.5 9 3.0 10 3.5 11 4.0 or more 12	8
2) Is this an <u>industrial</u> or <u>commercial</u> property? If yes, enter a score of 3. If no, enter a score of 1	3
3) ^a Enter a score in the box to the right for the habitat quality of the site, using the following rating system ^b . High=1, Intermediate=2, Low=3	3
4) Is the undeveloped land likely to attract wildlife? If yes, enter a score of 1 in the box to the right. If no, enter a score of 2. ^c	2
5) Are there any of the following soil contaminants present: Chlorinated dioxins/furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, endosulfan, endrin, heptachlor, benzene hexachloride, toxaphene, hexachlorobenzene, pentachlorophenol, pentachlorobenzene? If yes, enter a score of 1 in the box to the right. If no, enter a score of 4.	4
6) Add the numbers in the boxes on lines 2-5 and enter this number in the box to the right. If this number is larger than the number in the box on line 1, the simplified evaluation may be ended.	12

Notes for Table 749-1

Low: Early <u>successional</u> vegetative stands; vegetation predominantly noxious, nonnative, exotic plant species or weeds. Areas severely disturbed by human activity, including intensively cultivated croplands. Areas isolated from other habitat used by wildlife.

^a It is expected that this habitat evaluation will be undertaken by an experienced field biologist. If this is not the case, enter a conservative score of (1) for questions 3 and 4.

^b **Habitat rating system.** Rate the quality of the habitat as high, intermediate or low based on your professional judgment as a field biologist. The following are suggested factors to consider in making this evaluation:

High: Area is ecologically significant for one or more of the following reasons: Late-<u>successional</u> native plant communities present; relatively high species diversity; used by an uncommon or rare species; <u>priority habitat</u> (as defined by the Washington Department of fish and Wildlife); part of a larger area of habitat where size or fragmentation may be important for the retention of some species.

Intermediate: Area does not rate as either high or low.

^c Indicate "yes" if the area attracts wildlife or is likely to do so. Examples: Birds frequently visit the area to feed; evidence of high use b mammals (tracks, scat, etc.); habitat "island" in an industrial area; unusual features of an area that make it important for feeding animals; heavy use during seasonal migrations.

[Area Calculation Aid] [Aerial Photo with Area Designations] [TEE Table 749-1] [Index of Tables]

[Exclusions Main] [TEE Definitions] [Simplified or Site-Specific?] [Simplified Ecological Evaluation] [Site-Specific Ecological Evaluation] [WAC 173-340-7493]

[TEE Home]

APPENDIX G

Schedule



Appendix G

ExxonMobil / ADC Property, Ecology Site ID 2728 Work Schedule 2717/2731 Federal Avenue, Everett, Washington

The potential liable parties (PLPs) shall perform the actions identified in this work plan and required under the Agreed Order according to the schedule presented below. Days are calendar days; if due dates fall on a weekend or holiday, deliverables will be submitted to Ecology on the next business day. Note, when Ecology provides comments in red-line strikeout format (i.e., comments made directly within the electronic version of the document), the PLPs may respond to those comments directly within the electronic document.

1.0 REMEDIAL INVESTIGATION FIELD WORK

FFS Field Work – Activities associated with the FFS shall be initiated within 15 days of Ecology's execution of the final Agreed Order. Analytical sampling data collected as part of the FFS shall be provided to Ecology within 45 days after receipt of the validated data. The initial analytical data gathered as part of the FFS shall be compiled for Ecology in the form of a technical memo. The technical memo should discuss the field activities and associated analytical results in addition to preliminary cleanup levels, the extent of contamination (plotted on maps), and any data gaps that need to be filled to define the nature and extent of contamination. Note that the preliminary cleanup levels may be different than the screening levels identified in this work plan based on a better understanding of the conceptual site model for the Site (e.g., it may be shown that contaminants in site soil and/or groundwater may not be impacting surface water).

The data and results associated with the tidal study shall be presented in the form of a technical memo to Ecology within 30 days after completion the tidal study field work. The data and results of the tidal study may be included in the technical memo described in the paragraph above, or as a separate document.

Information provided in the technical memo(s) described above will be used to make a determination with regard to whether additional investigation is required to define the full nature and extent of contamination (see next bullet).

<u>Additional field FFS activities (if needed)</u> – Additional field FFS activities may be required to adequately delineate the nature and extent of contamination at the Site, and/or to conduct pilot testing of a remedial alternative. The scope, schedule, and submittal requirements for additional field FFS activities shall be developed by the PLPs, and shall be submitted to Ecology for review and concurrence.

<u>Environmental Data Submittals</u> — All sampling data (including all historic data) shall be submitted to Ecology in both printed and electronic formats in accordance with Ecology's Toxics Cleanup Program Policy 840 (Data Submittal Requirements) and/or any subsequent procedures specified by Ecology for data submittal. Policy 840 is presented in Exhibit C of this Agreed Order. Historic data, in addition to new data collected as part of the initial or first phase of the FFS, shall be supplied to Ecology in electronic format (i.e., EIM and the PLPs original database format) 45 days after the new data has been validated. Data collected as part of any additional FFS field sampling activities shall also be supplied to Ecology in electronic format (i.e., EIM) 45 days after the data has been validated.

2.0 FFS REPORT SUBMITTAL

<u>First Draft FFS Report</u> – The first draft FFS report shall be due to Ecology 120 calendar days after receipt by the PLPs Project Manager of all final analytical data collected during the FFS. The first draft will then undergo a 30-day review period by Ecology.

<u>Second Draft FFS Report</u> – The second draft FFS report shall address any comments/suggestions submitted by Ecology. The second draft FFS report shall be due 60 days after Ecology provides its comments. The draft final version will undergo a 20-day review period by Ecology.

<u>Draft Final FFS Report</u> – The draft final FFS report shall be due 30 days after receipt of Ecology comments on the second draft FFS report.

<u>Final FFS Report</u> – The final FFS report shall be submitted to Ecology 45 days after Ecology's final review and comments. The final FFS will be included in the public comment period conducted for the Cleanup Action Plan (see 3. below)

3.0 CLEANUP ACTION PLAN (CAP) SUBMITTAL

<u>Draft CAP</u> – The draft CAP shall be submitted to Ecology 60 days after the draft final FFS Report is finalized and ready for public comment. This draft CAP will then undergo a 30-day review period by Ecology.

<u>Draft Final CAP</u> – The draft final CAP shall address comments submitted by Ecology on the draft CAP. This draft final CAP shall be due 60 days after submittal of Ecology comments of the draft CAP. The draft final CAP will undergo a 30-day public comment period under a second Agreed Order or Consent Decree before it becomes a final document. The comment period for the draft final FFS report will be combined with the comment period for the draft CAP/second Agreed Order or Consent Decree.

APPENDIX H

List of applicable or relevant and appropriate requirements



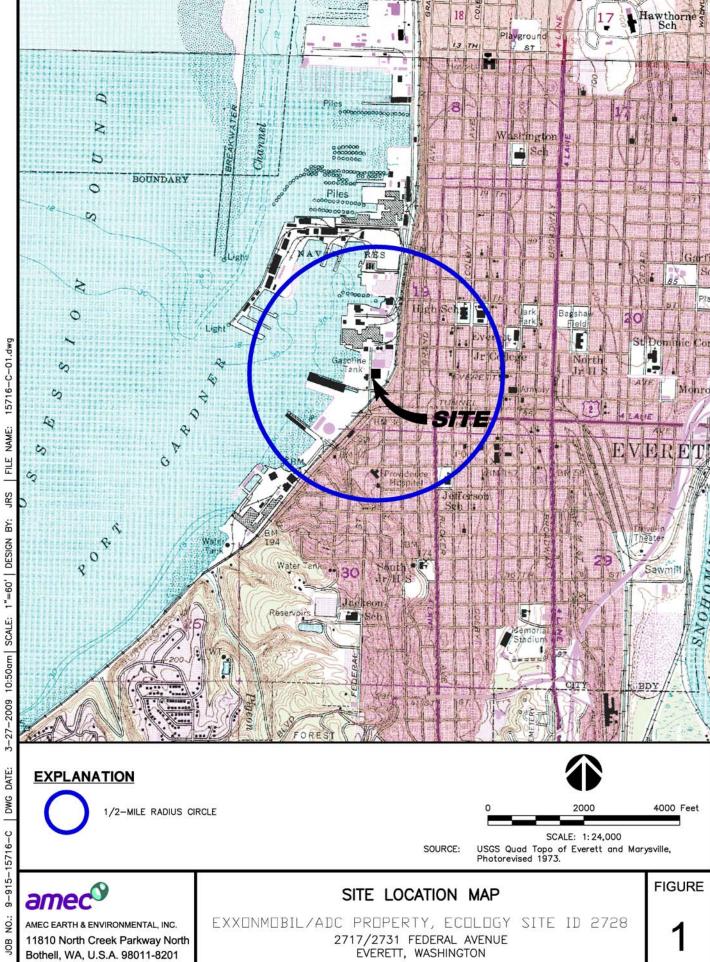
Appendix H

Applicable or Relevant and Appropriate Requirements (ARARs)

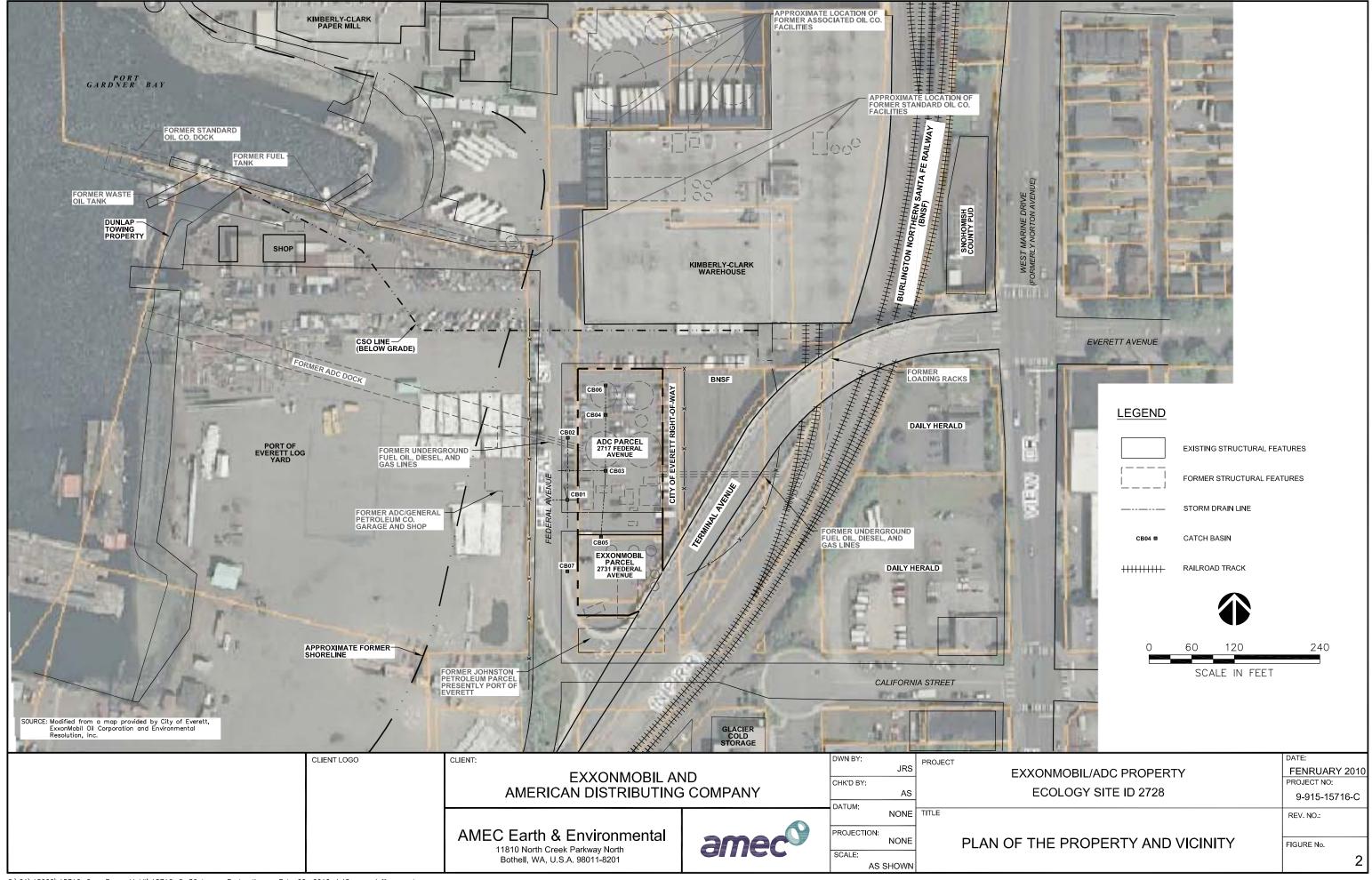
The starting point for ARARs is the MTCA cleanup levels and regulations that address implementation of a cleanup under MTCA (Chapter 173.105D RCW; Chapter 173-340 WAC).

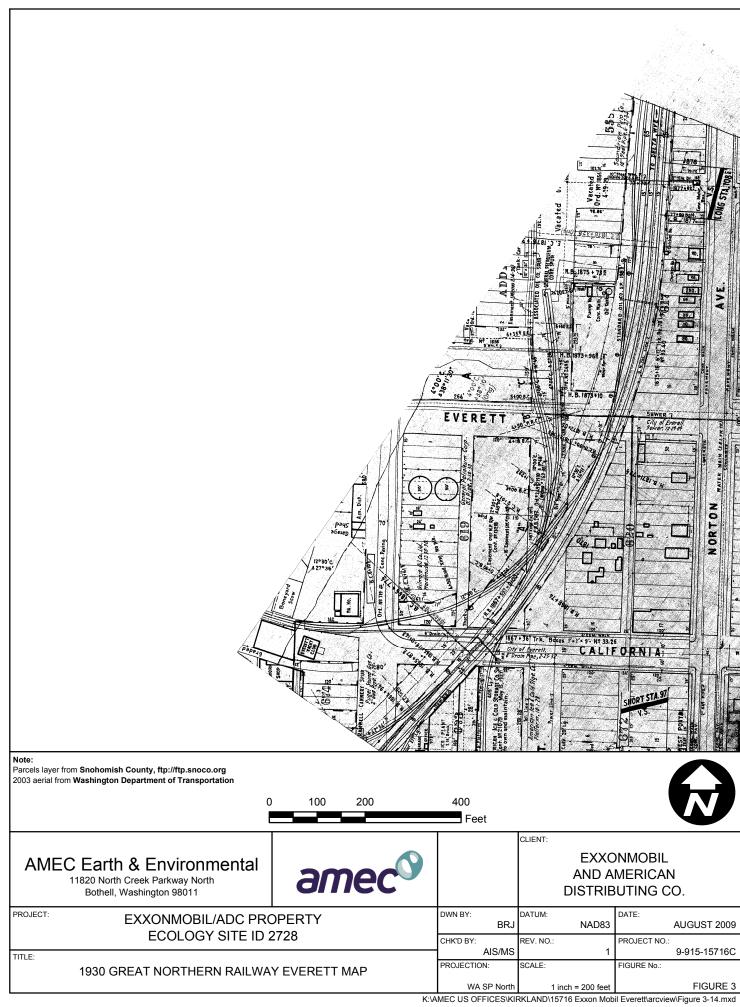
Other potential ARARs may include the following:

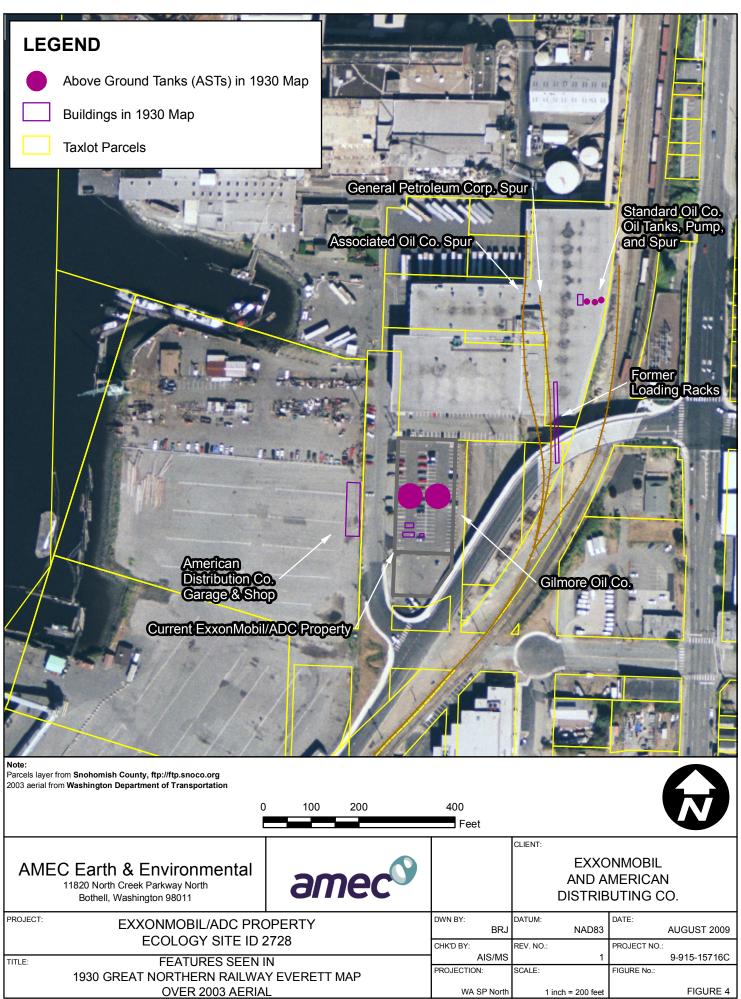
- 1. State Water Pollution Control Act (Chapter 90.48 RCW).
- 2. Applicable surface water quality criteria published in the water quality standards for surface waters of the State of Washington, Chapter 173-201A WAC.
- 3. Applicable surface water quality criteria published under Section 304 of the Clean Water Act.
- 4. Applicable surface water quality criteria published under National Toxics Rule (40 C.F.R. Part 131).
- 5. Washington State Hazardous Waste Management Act (Chapter 70.105 RCW, and State Dangerous Waste Regulation (Chapter 173-303).
- 6. Solid Waste Management-Reduction and Recycling (Chapter 70.95 RCW).
- 7. Minimum Standards for Construction and Maintenance of Wells (Chapter 173-160 RCW).
- 8. Washington Clean Air Act (Chapter 70.94 WAC).
- 9. Puget Sound Clean Air Agency Regulations (http://www.pscleanair.org).
- 10. Occupational Safety and Health Act (OSHA), 29 CFR Subpart 1910.120.
- 11. Washington Industrial Safety and Health Act (WISHA).
- 12. Shoreline Management Act (Chapter 90.58 and Chapter 173-14-28 WAC)
- 13. Archaeological and Cultural Resources Act (Chapter 43.53 RCW)



NO.:

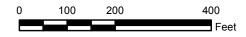








Parcels layer from Snohomish County, ftp://ftp.snoco.org 2003 aerial from Washington Department of Transportation



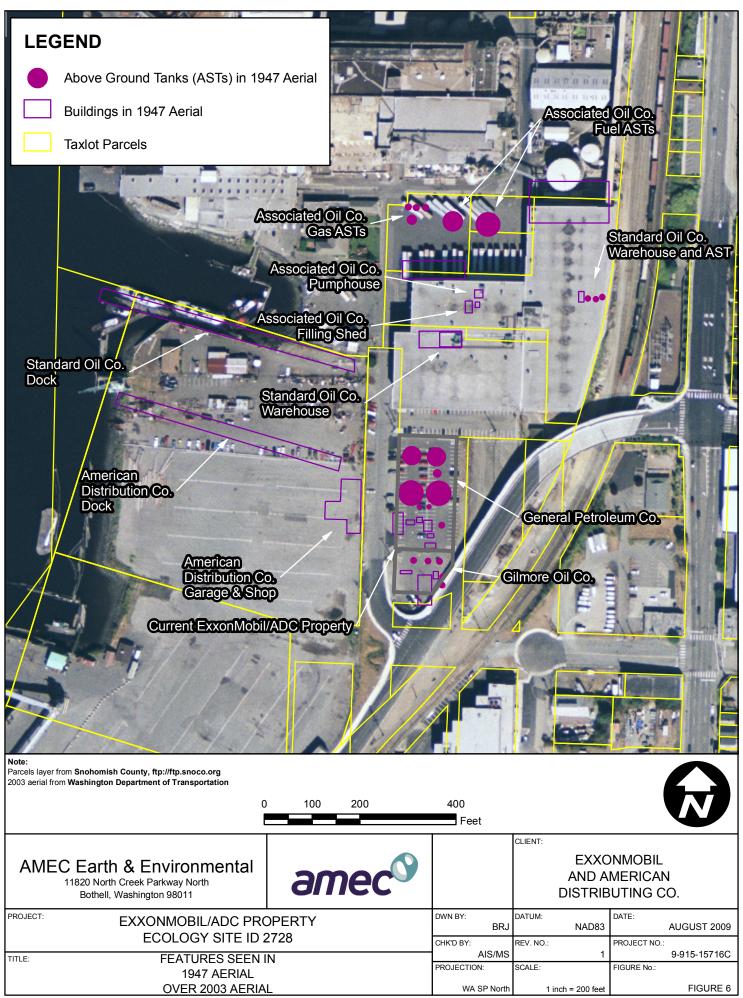


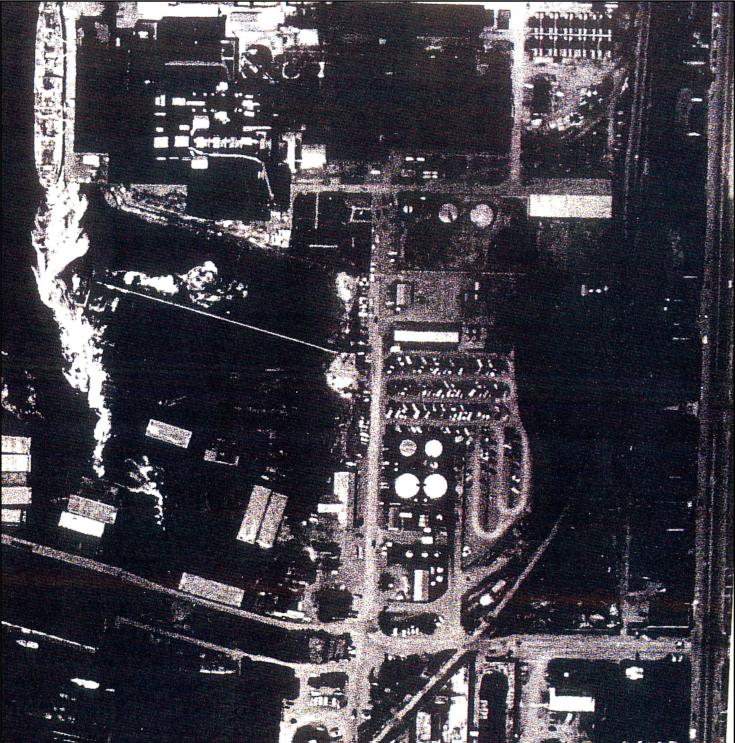
AMEC Earth & Environmental

11820 North Creek Parkway North Bothell, Washington 98011

EXXONMOBIL AND AMERICAN DISTRIBUTING CO.

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Note: Parcels layer from Snohomish County, ftp://ftp.snoco.org 2003 aerial from Washington Department of Transportation

400 100 200 Feet



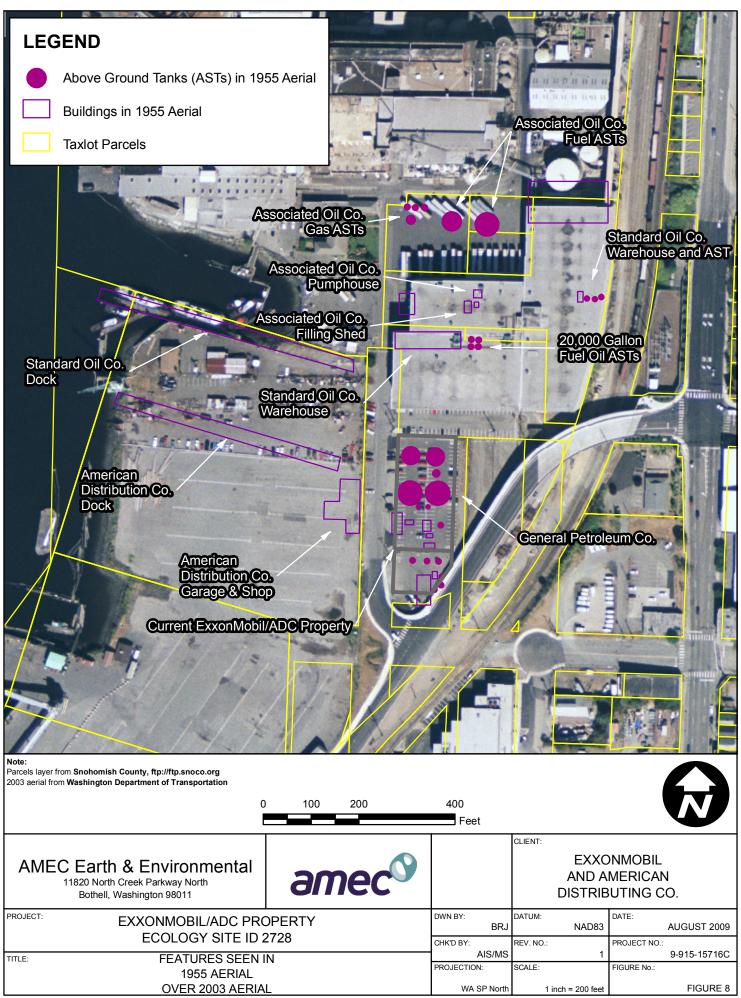
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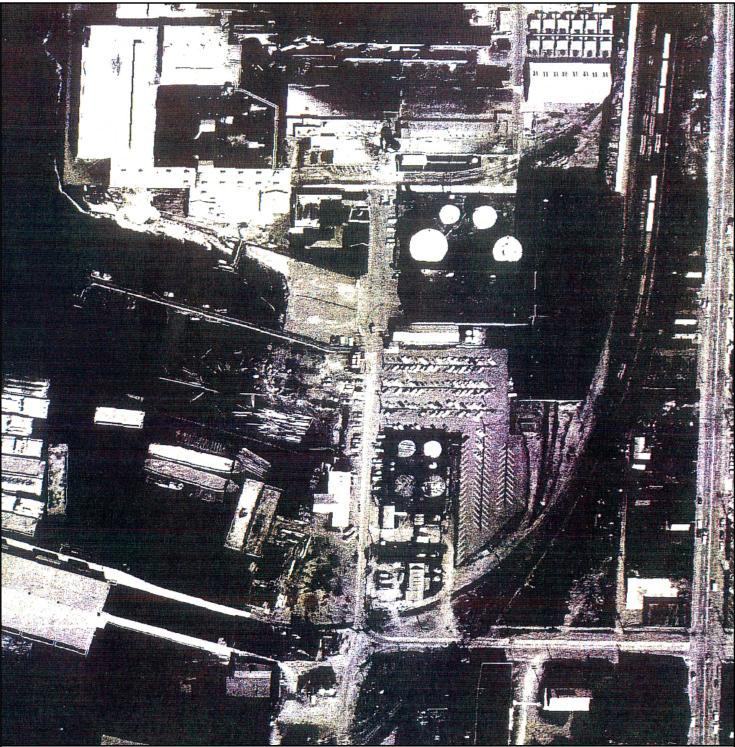
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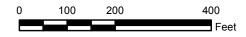
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Note: Parcels layer from Snohomish County, ftp://ftp.snoco.org 2003 aerial from Washington Department of Transportation





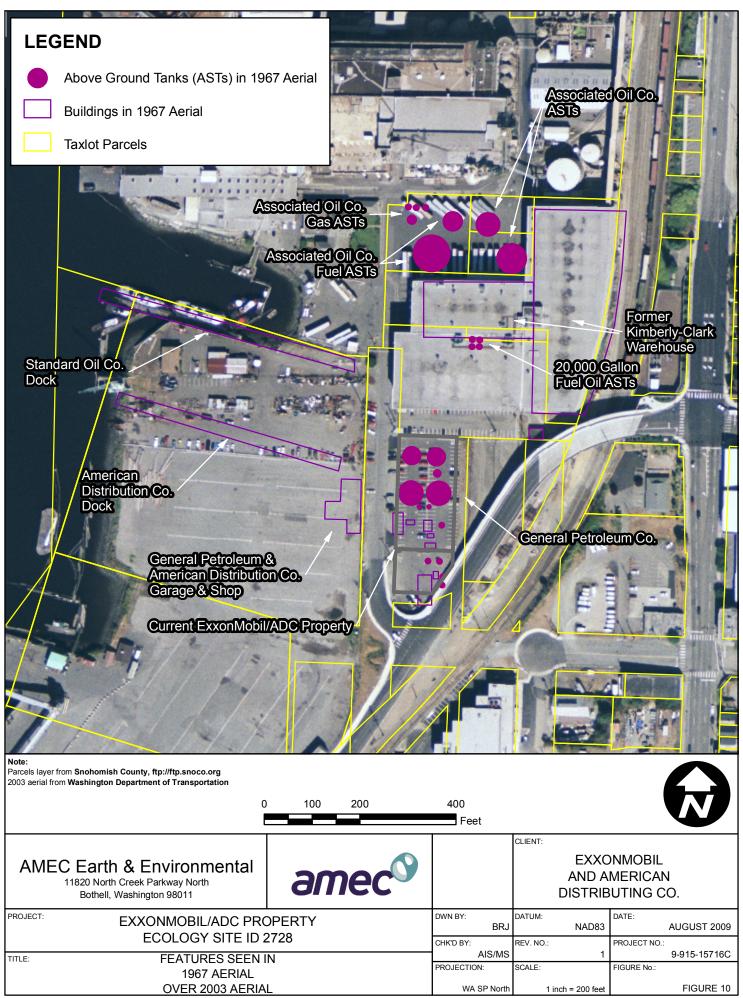
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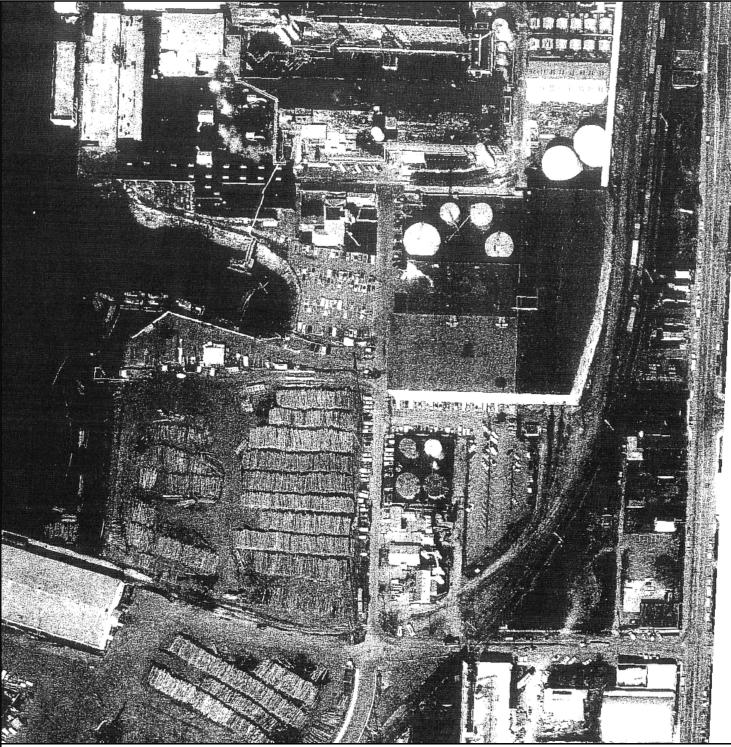
11820 North Creek Parkway North Bothell, Washington 98011

amec [©]

EXXONMOBIL AND AMERICAN DISTRIBUTING CO.

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Parcels layer from Snohomish County, ftp://ftp.snoco.org 2003 aerial from Washington Department of Transportation

400 100 200 Feet



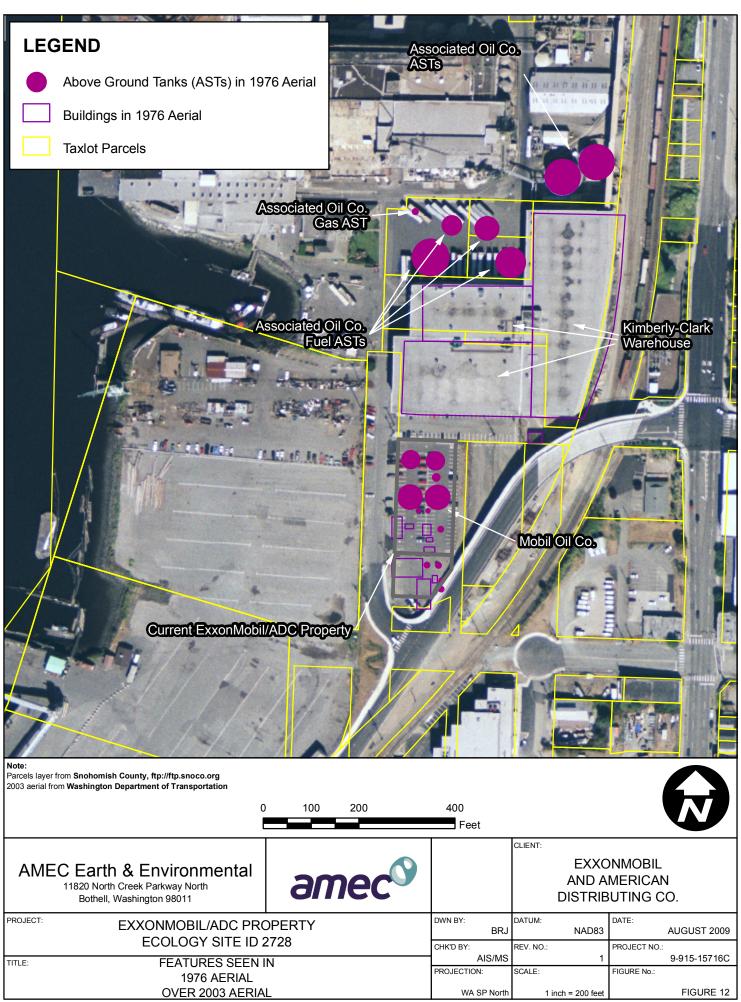
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11820 North Creek Parkway North Bothell, Washington 98011

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EXXONMOBIL AND AMERICAN DISTRIBUTING CO.

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Note:

Parcels layer from Snohomish County, ftp://ftp.snoco.org 2003 aerial from Washington Department of Transportation



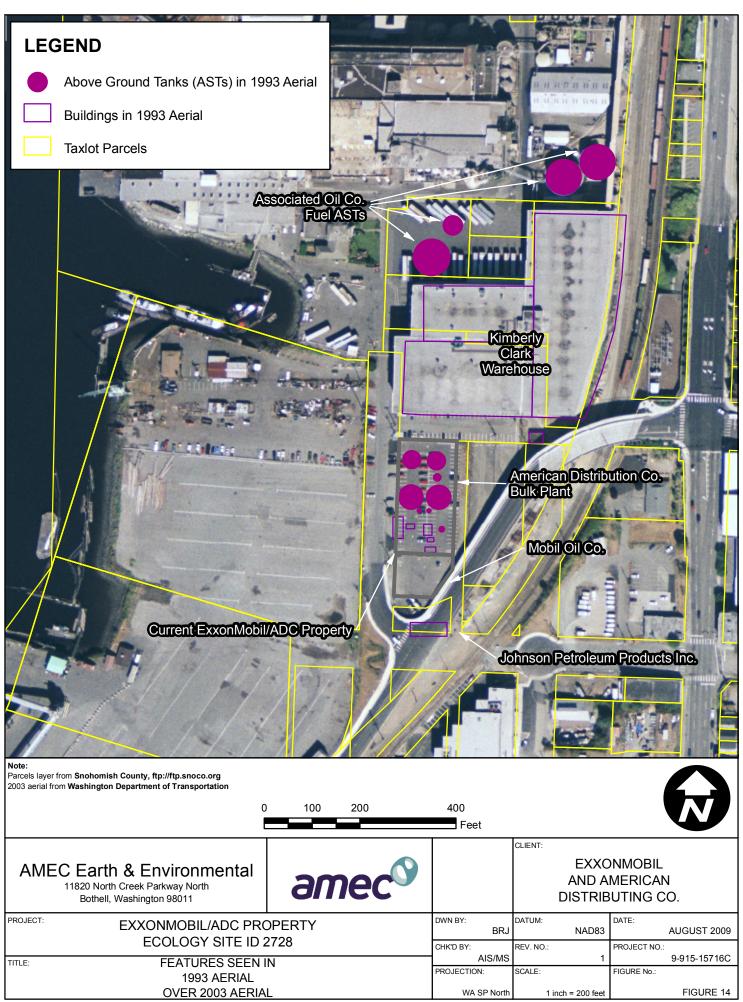


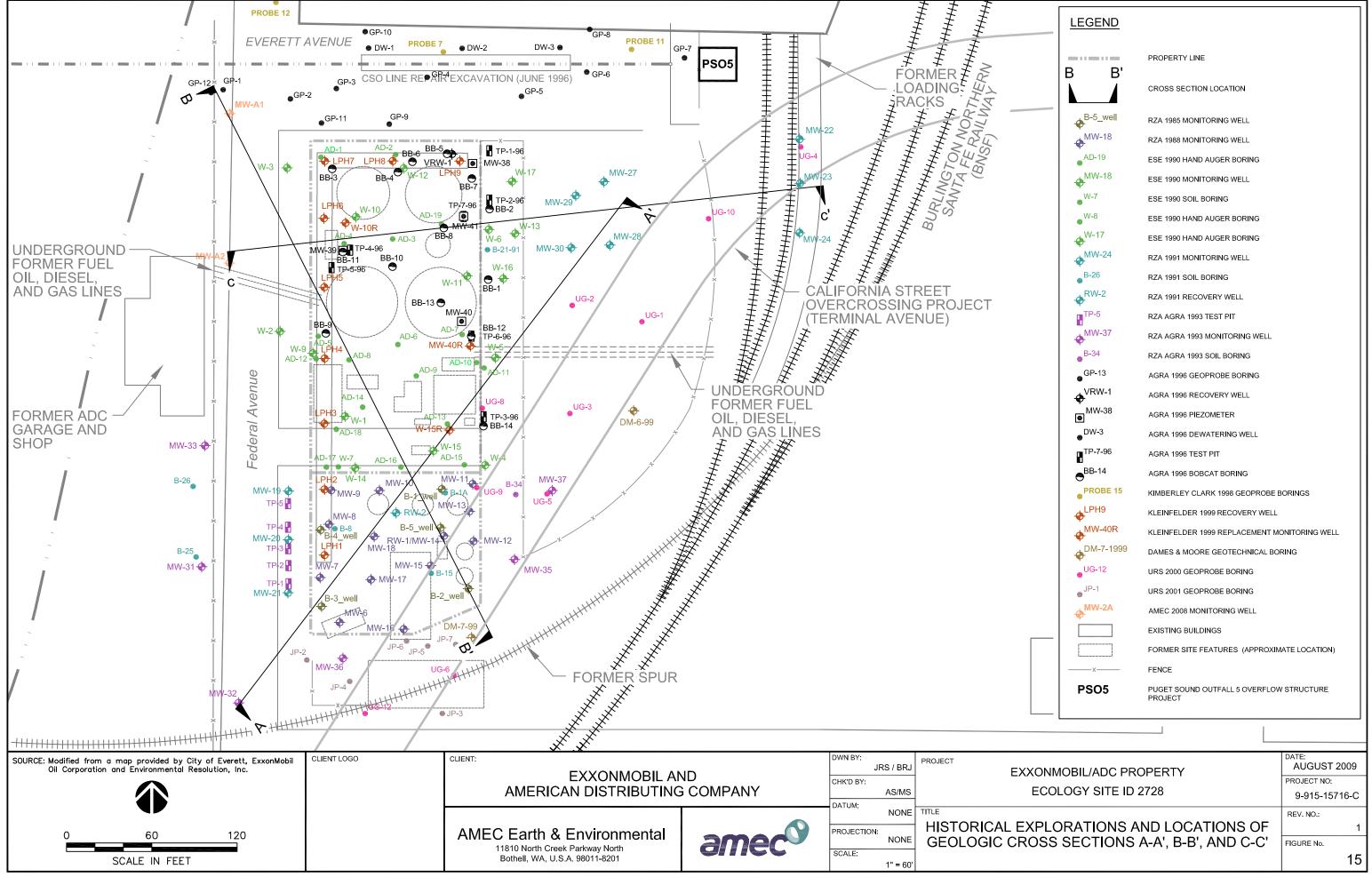
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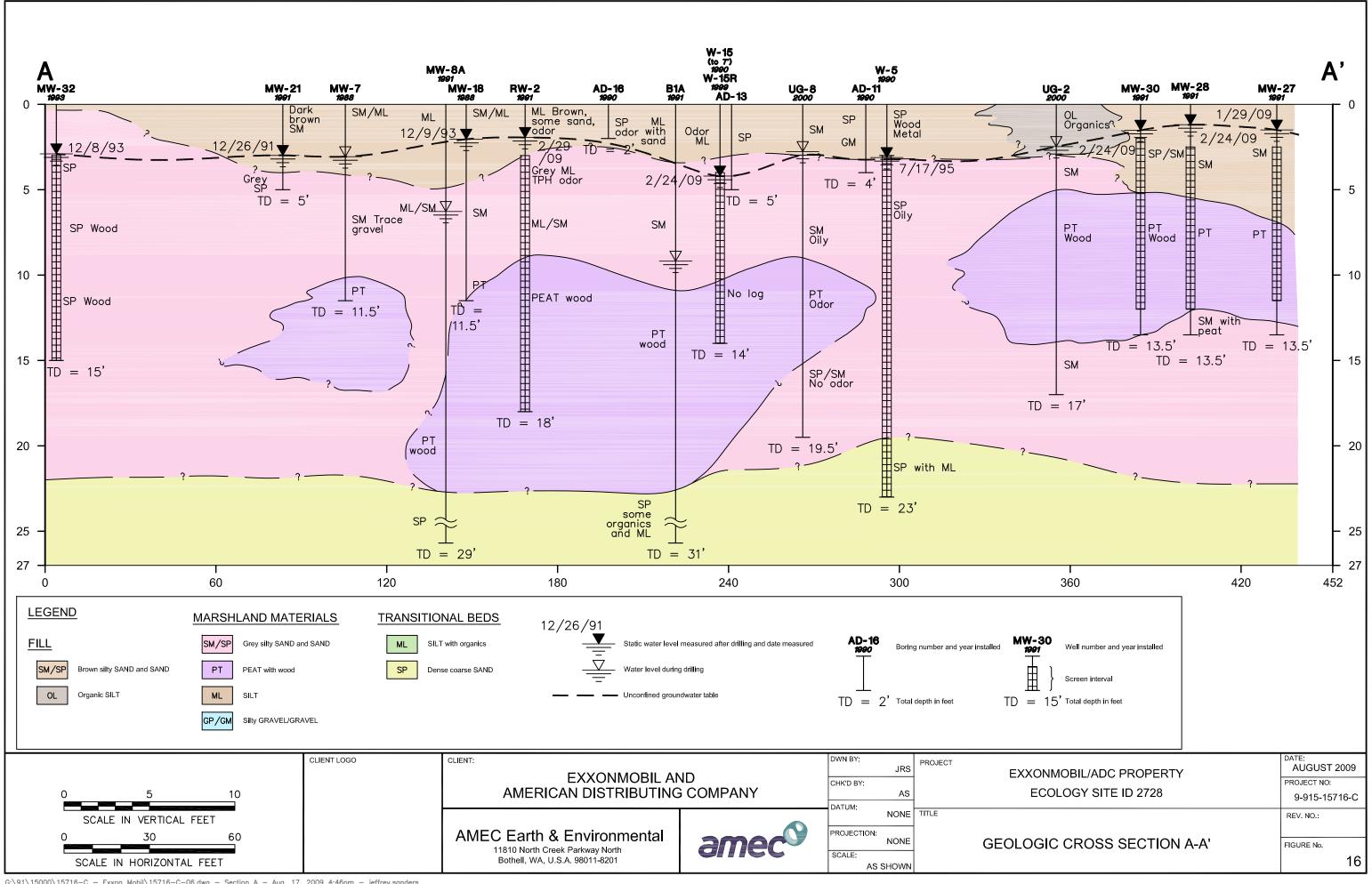
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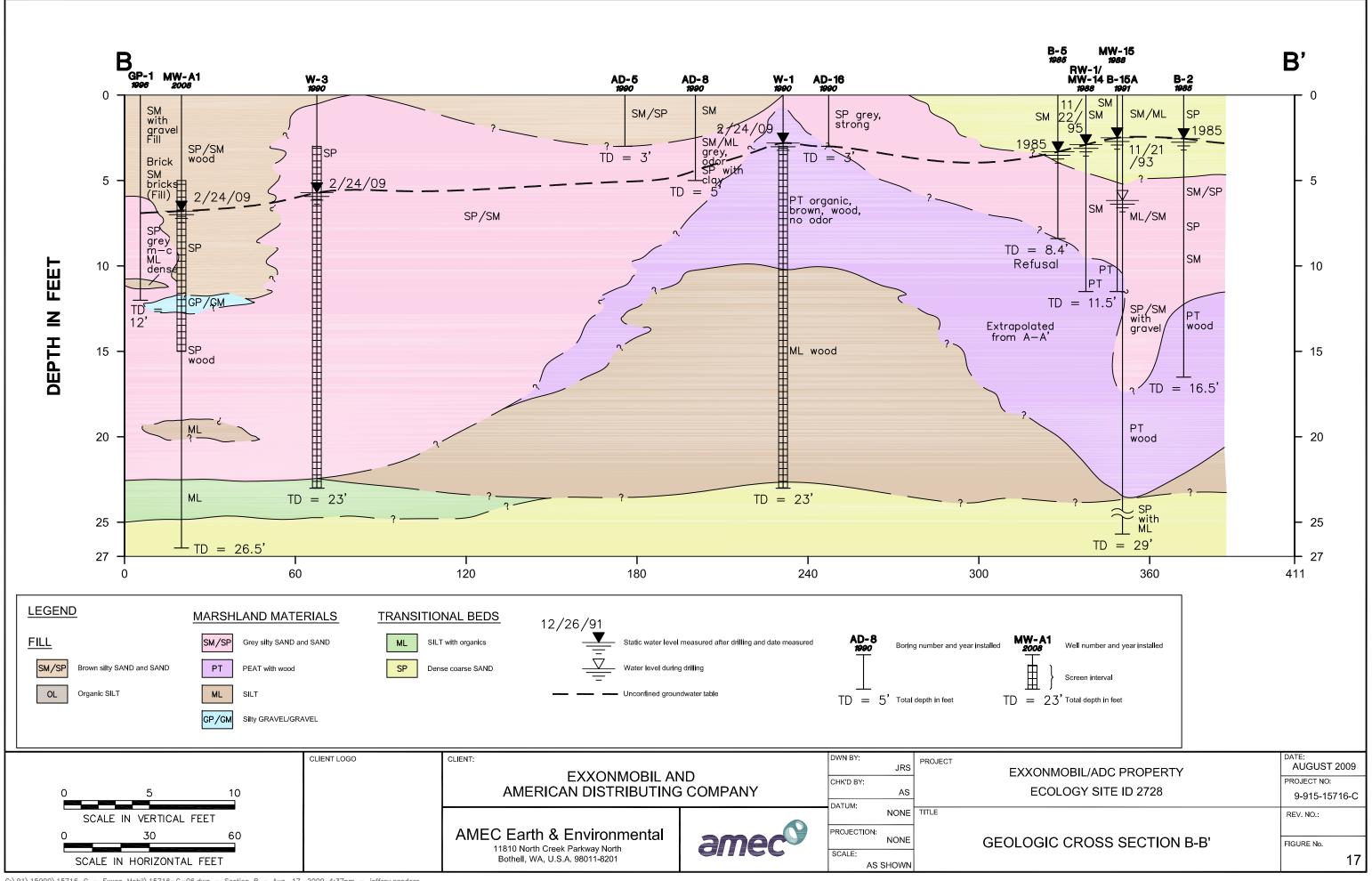
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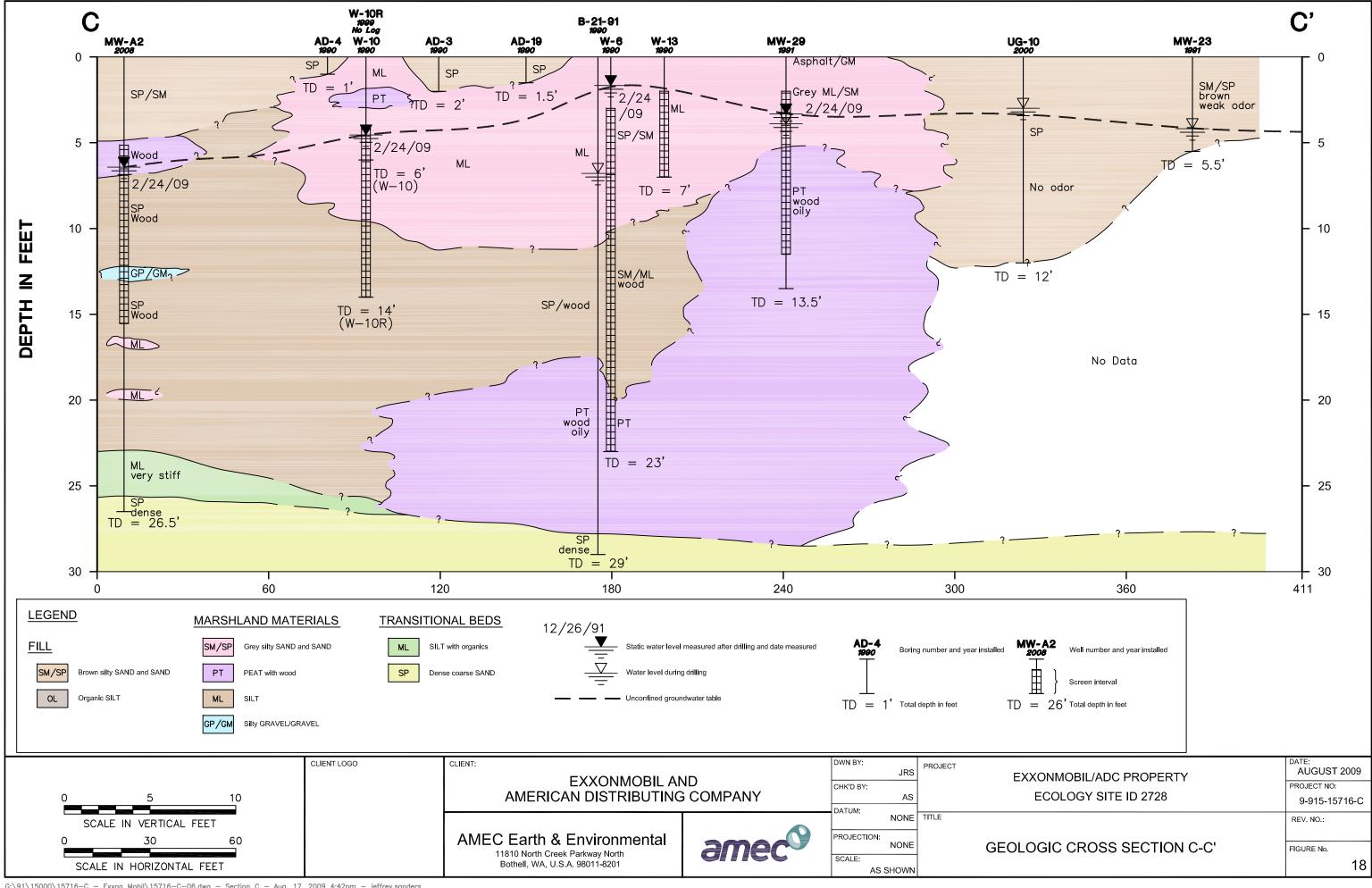
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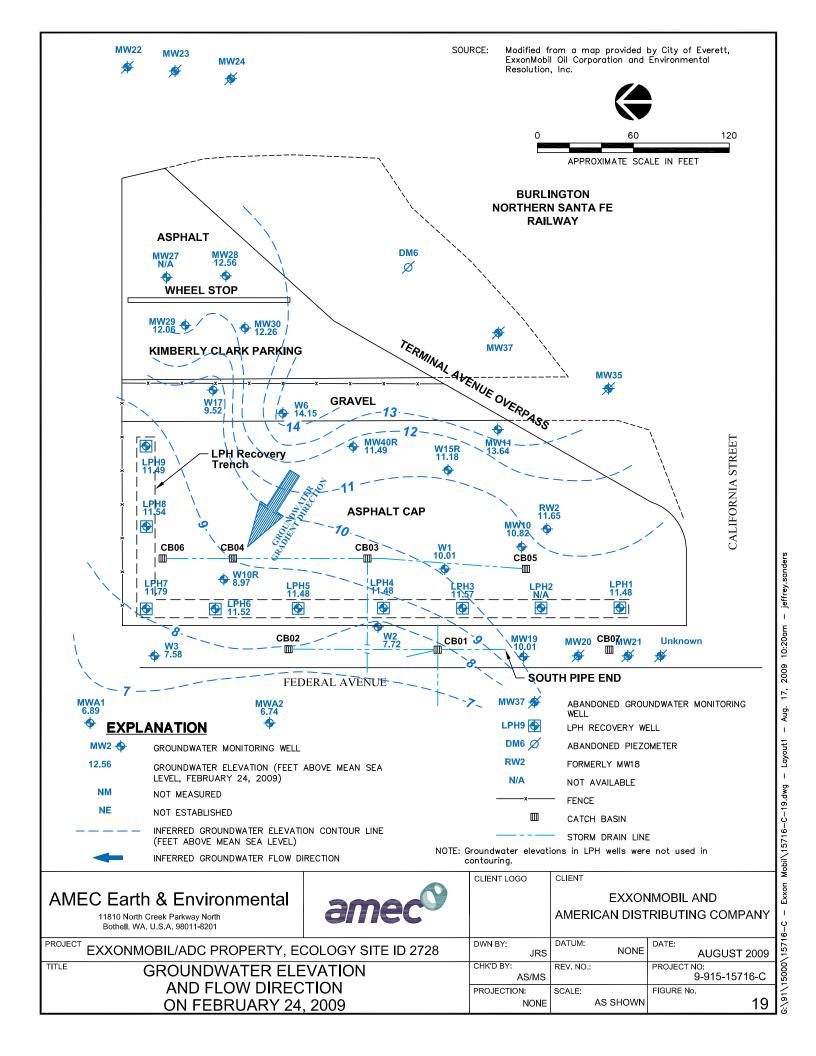


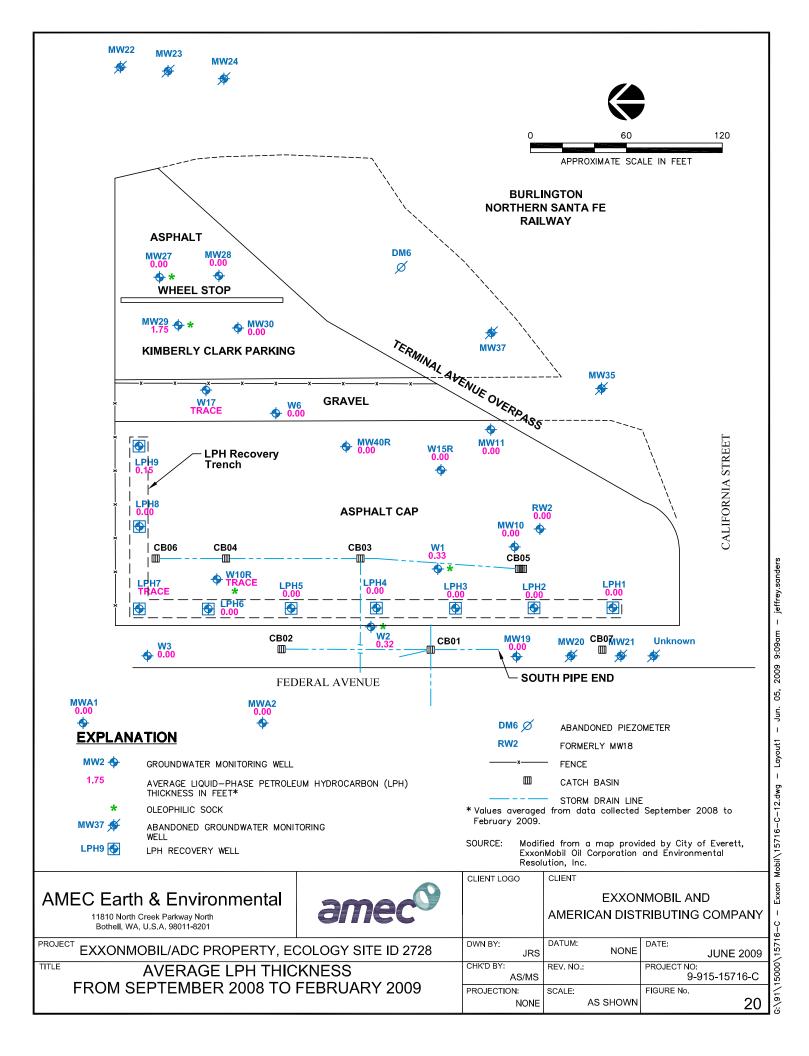


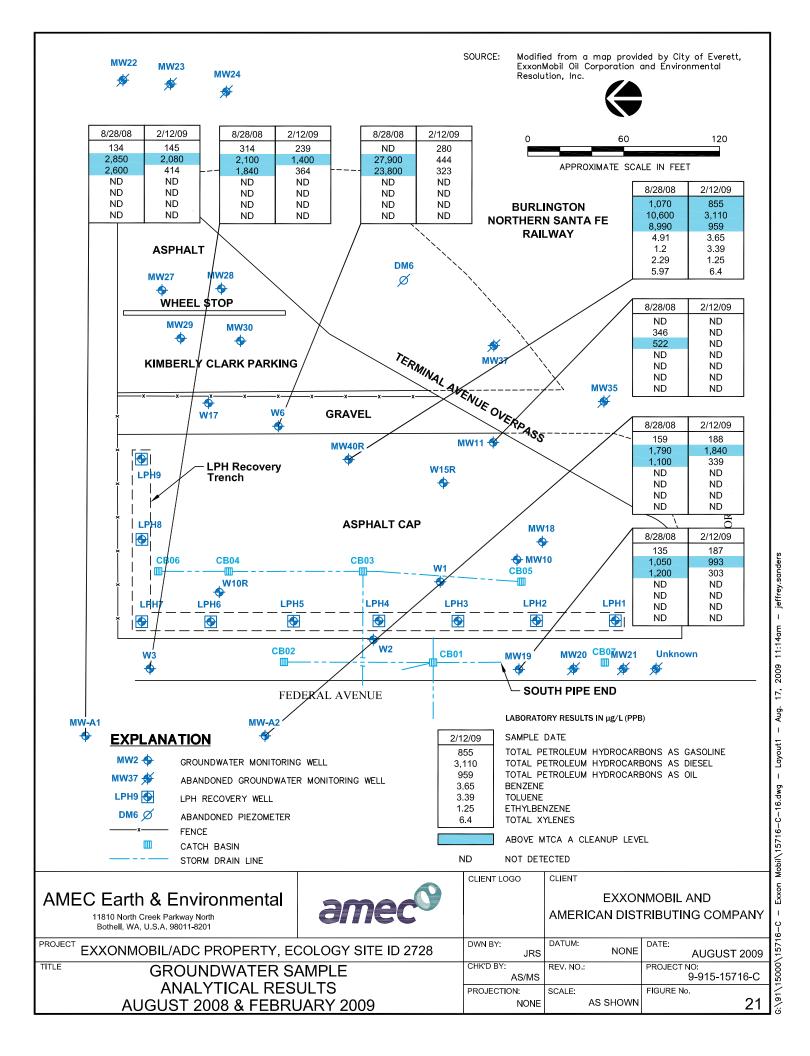


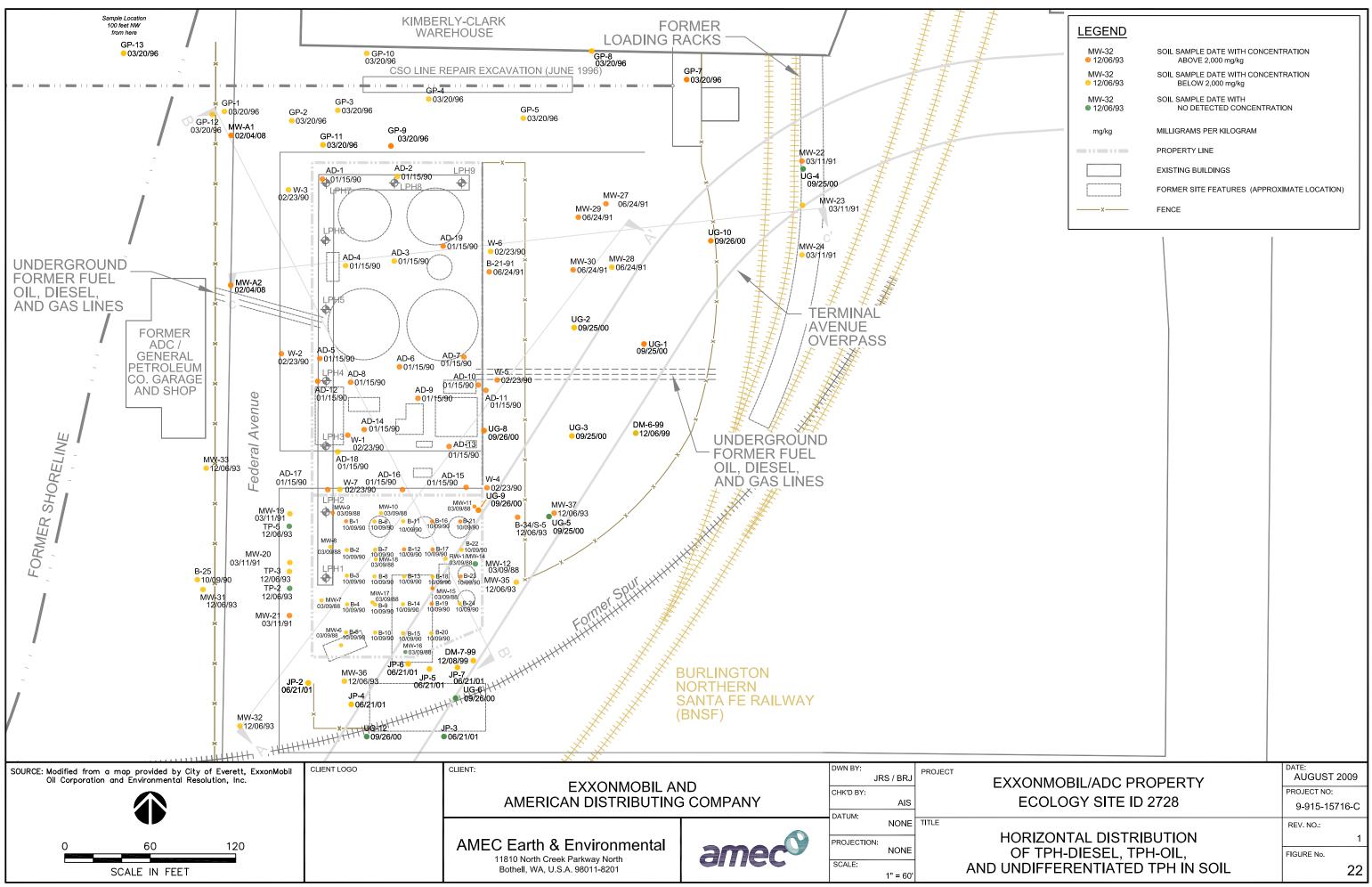


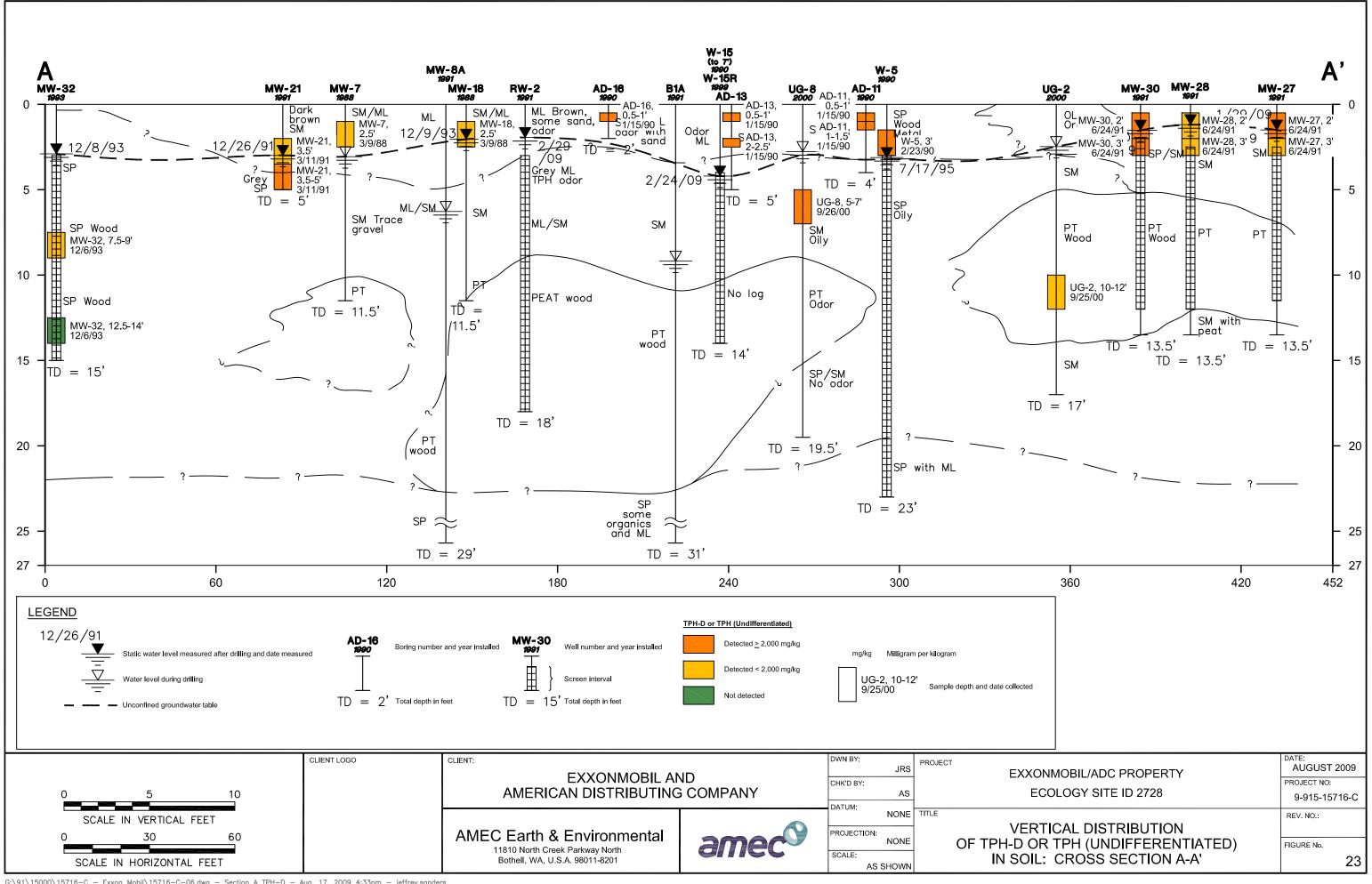


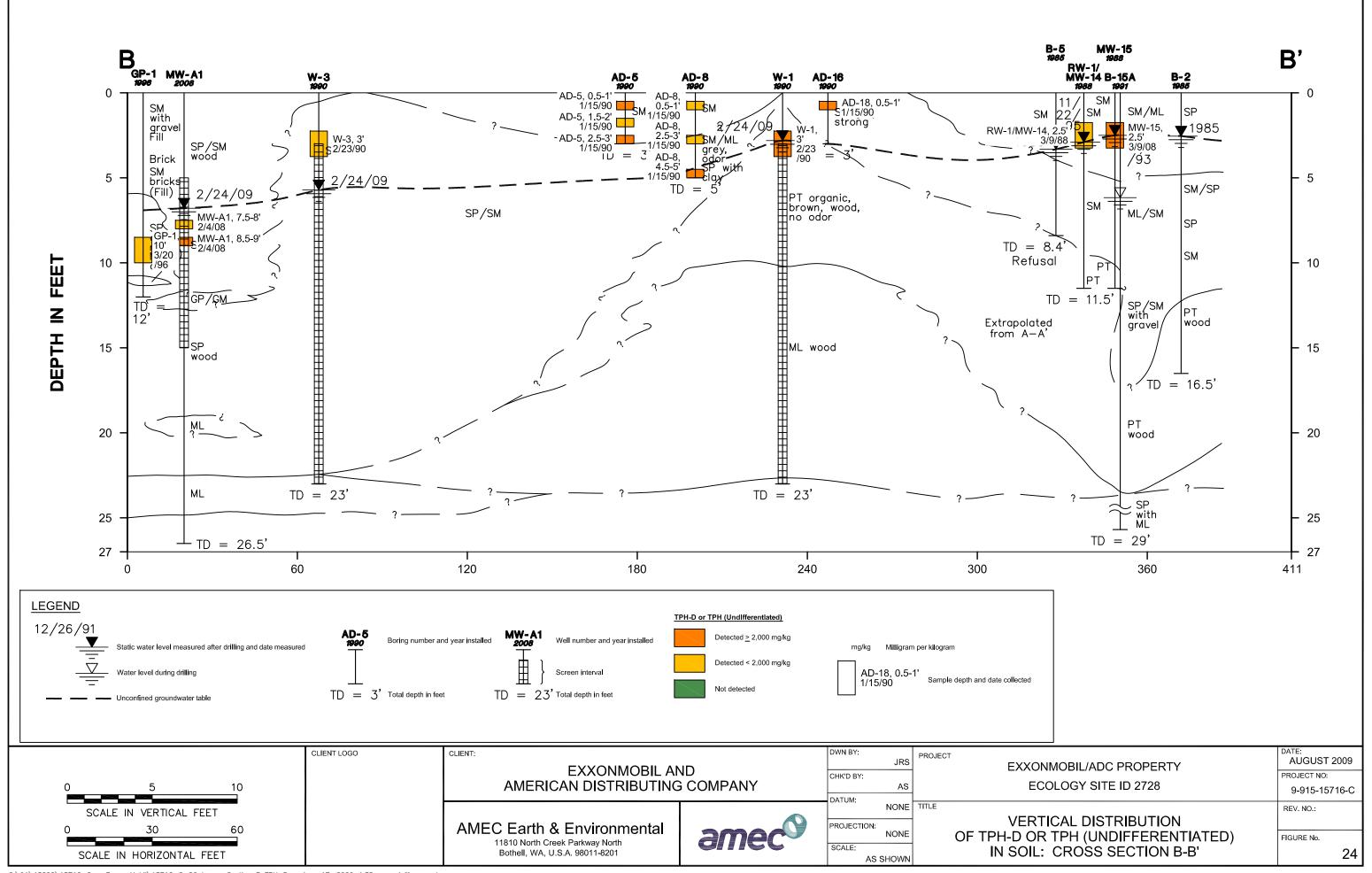


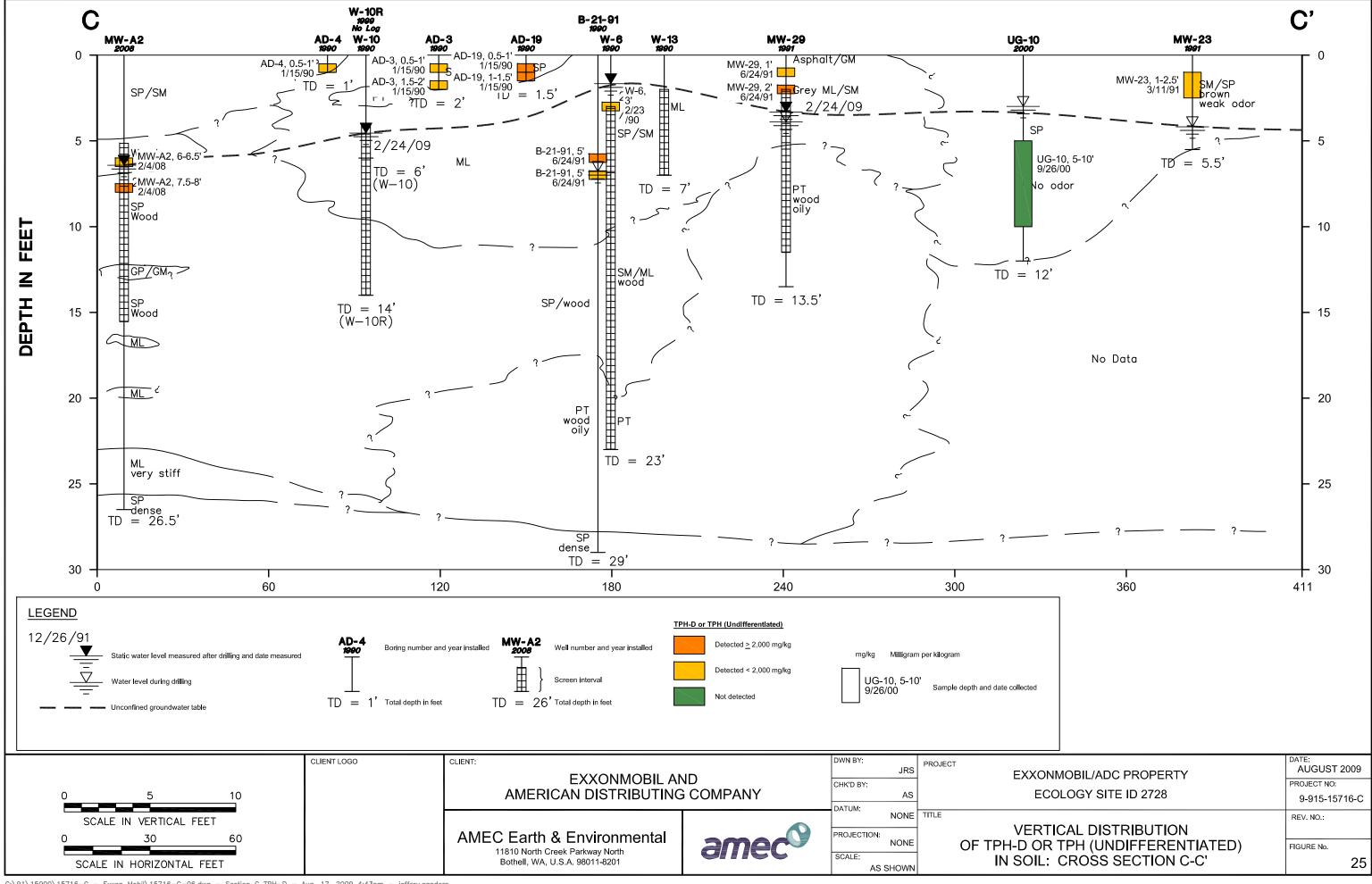


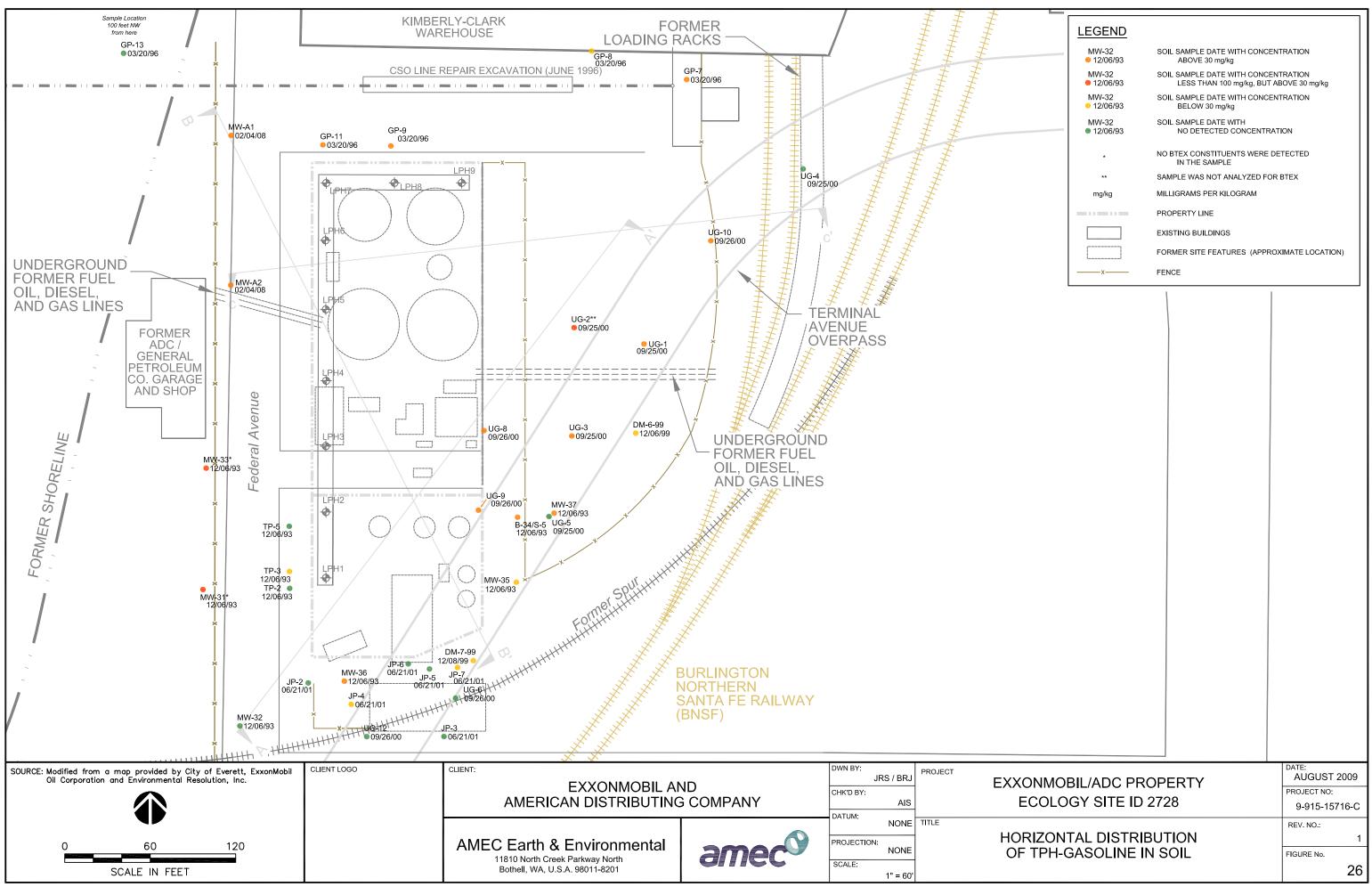


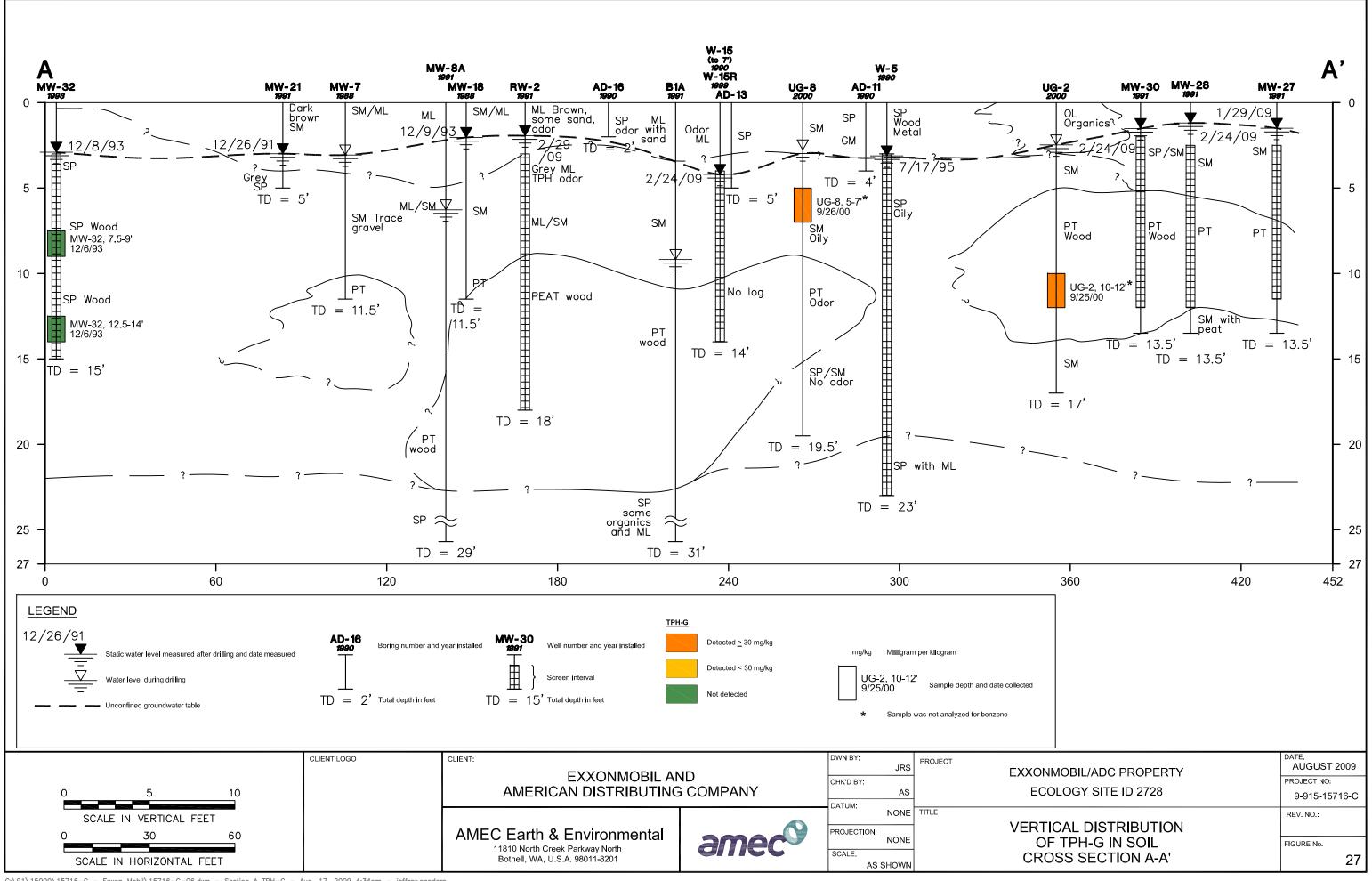


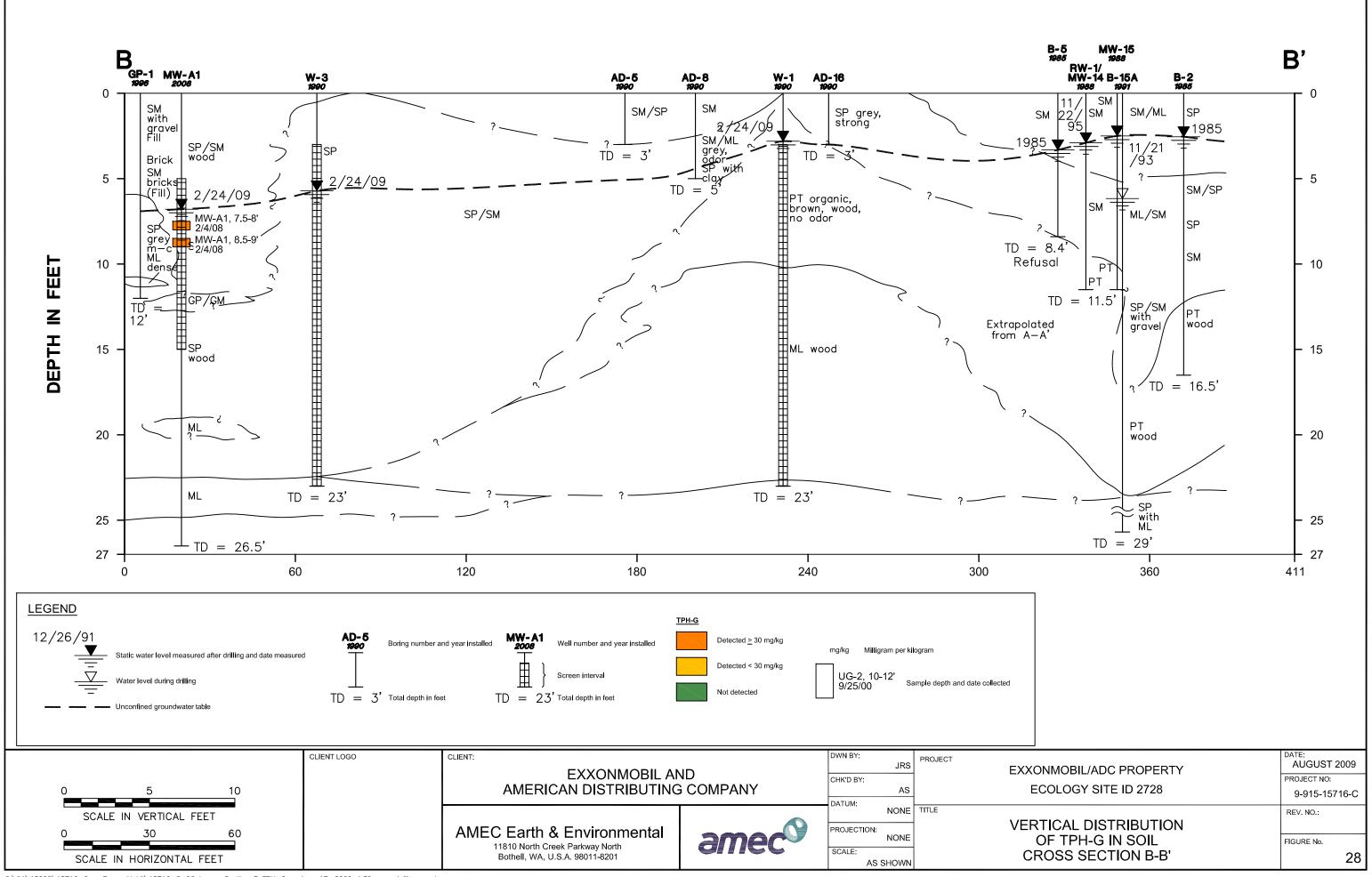


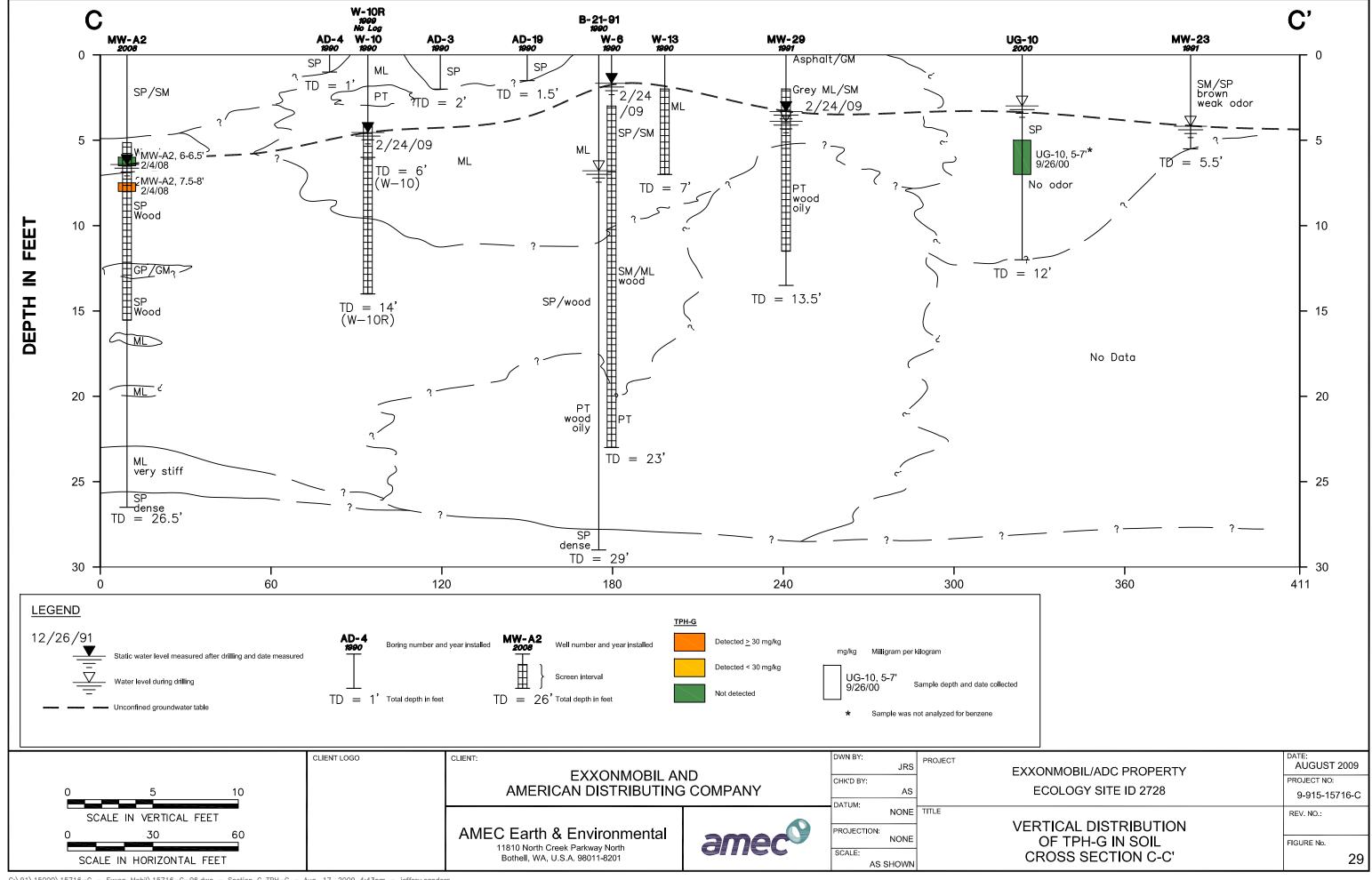


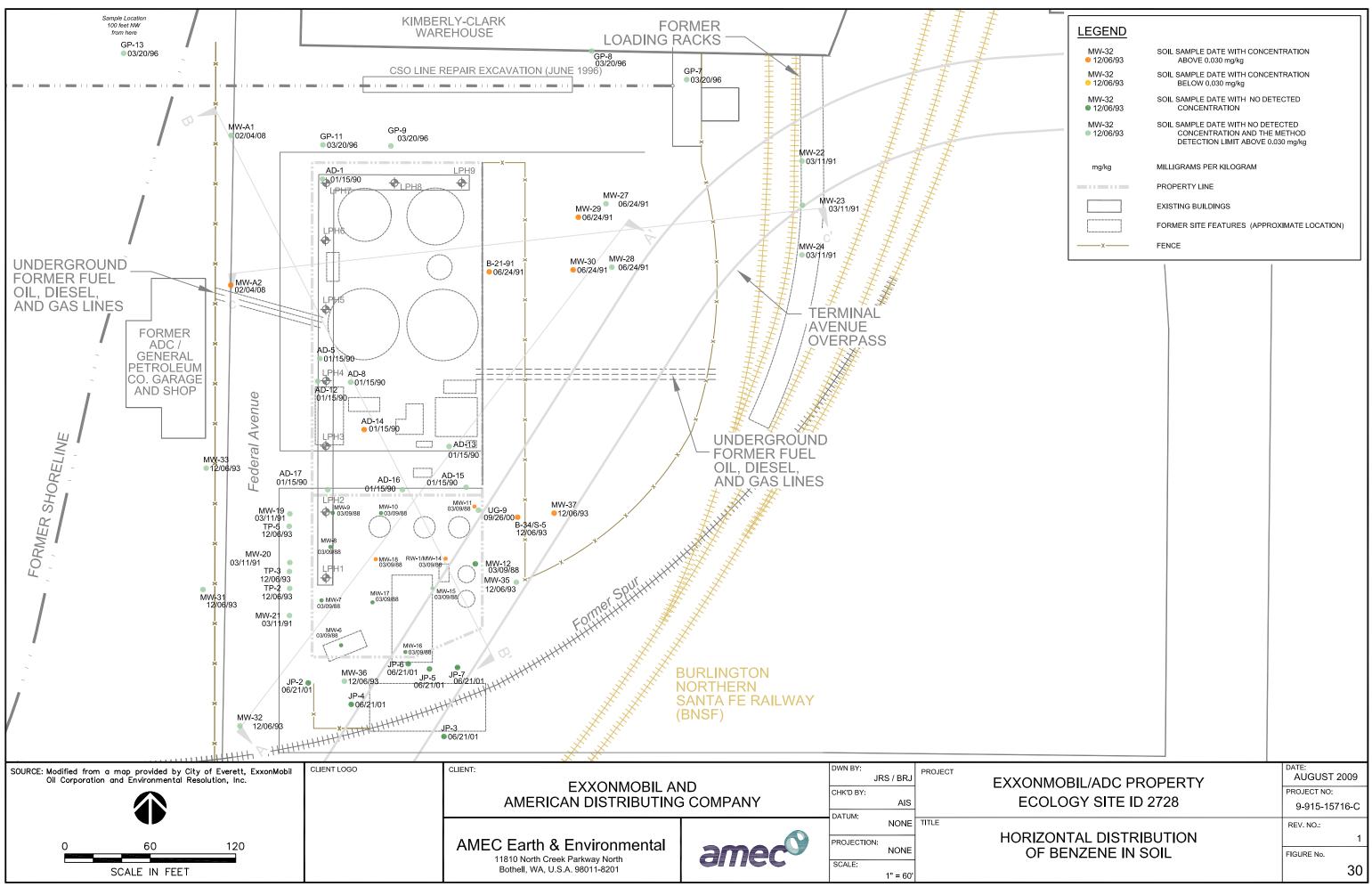


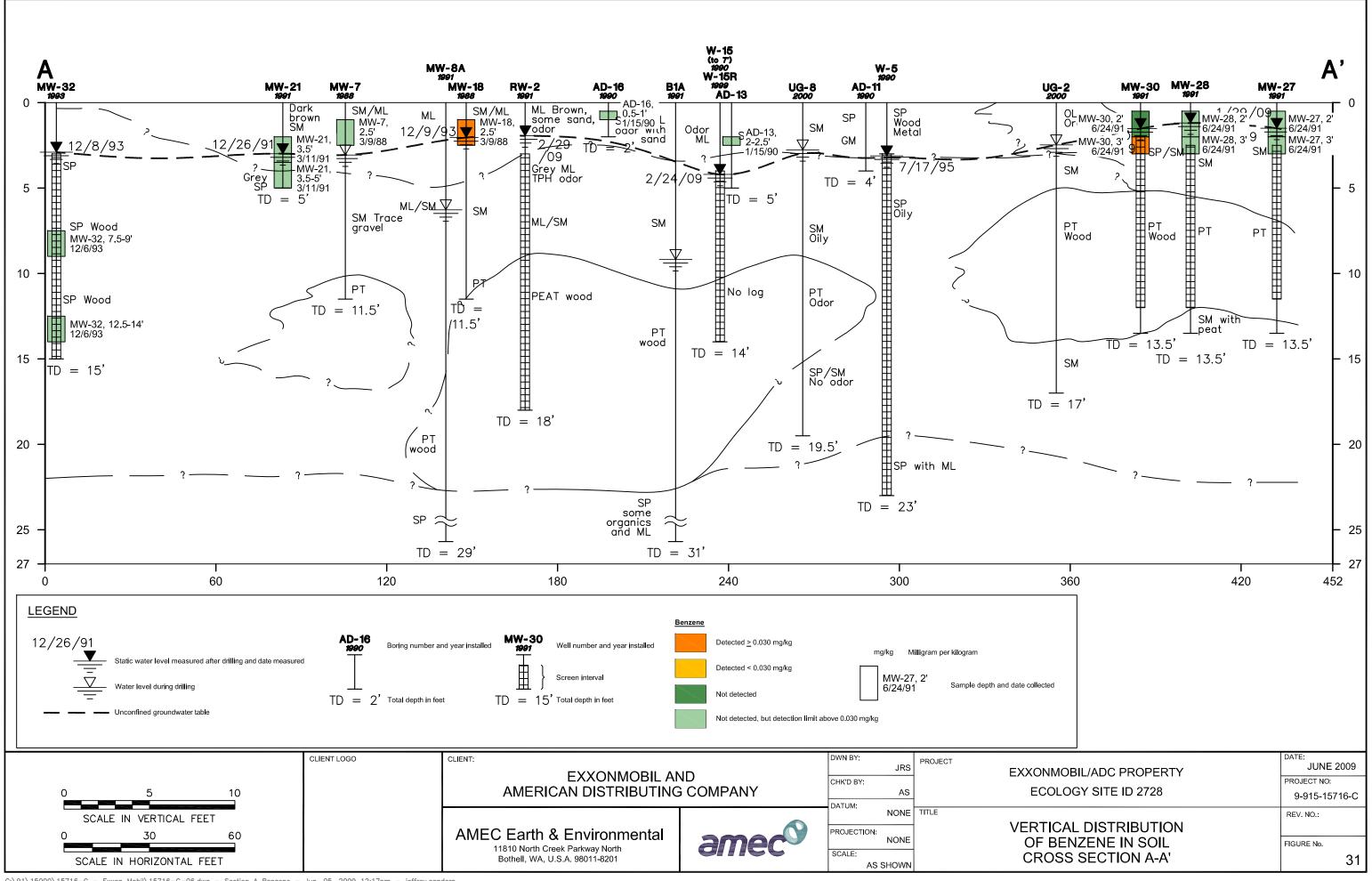


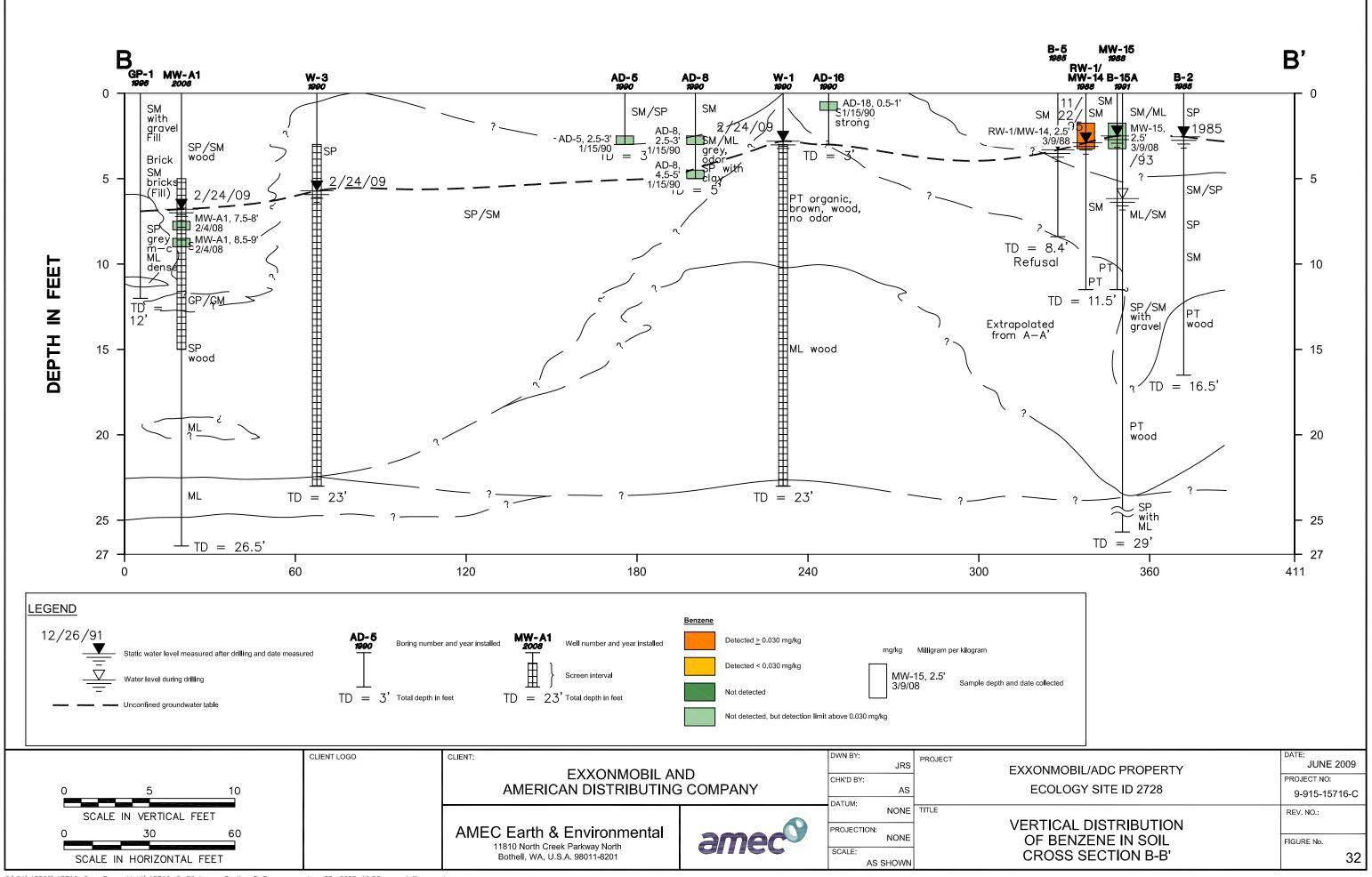


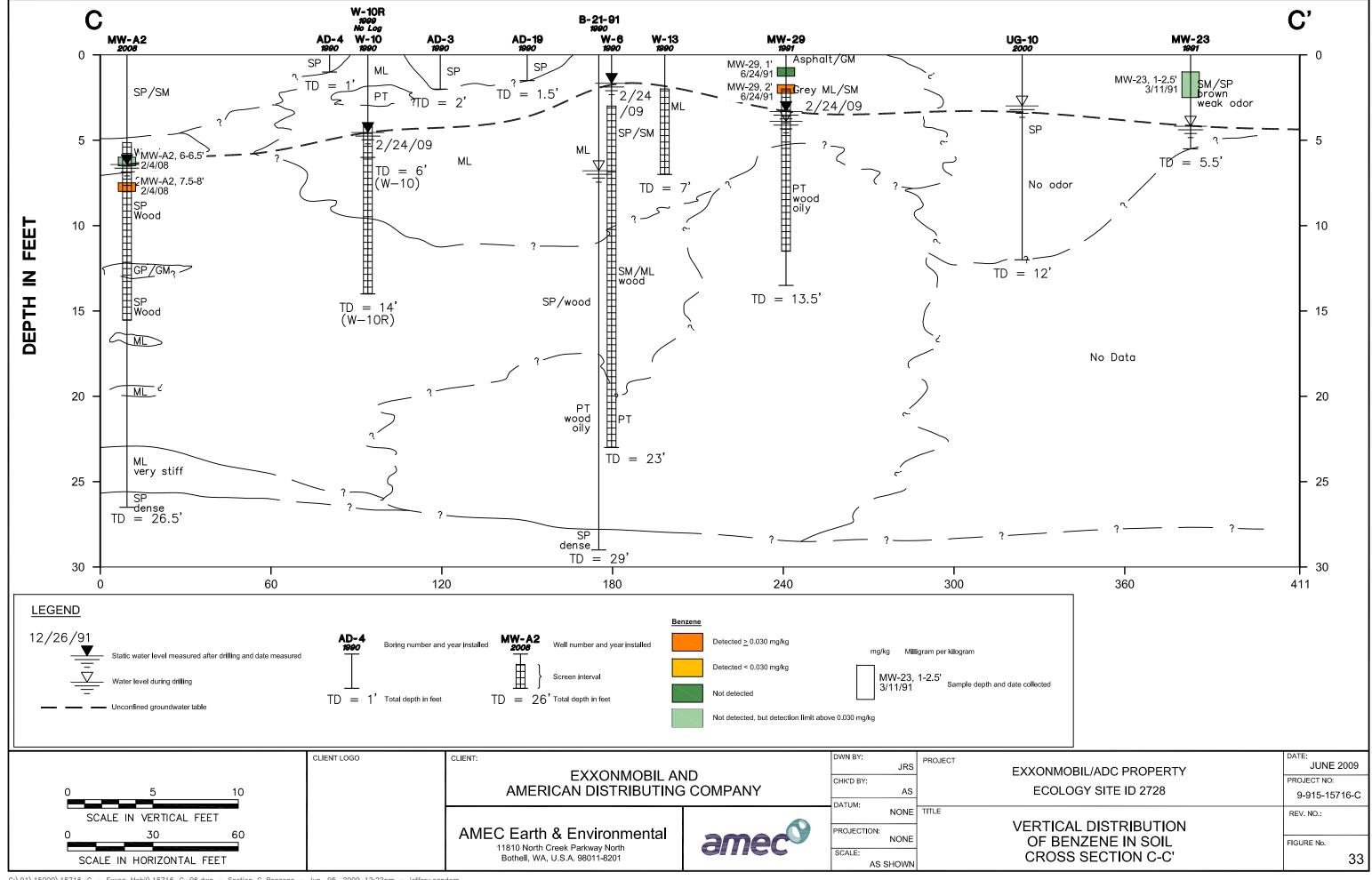


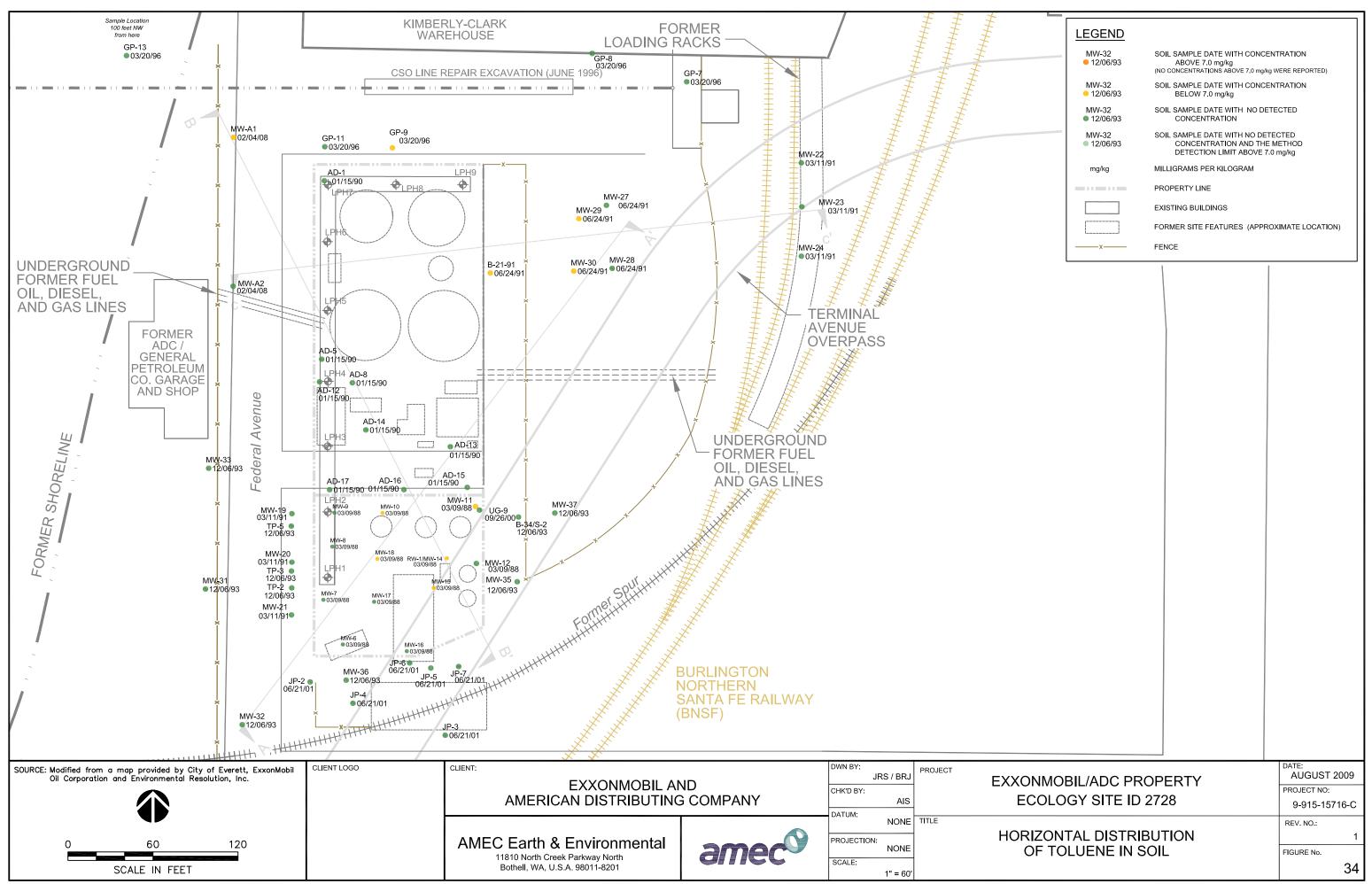


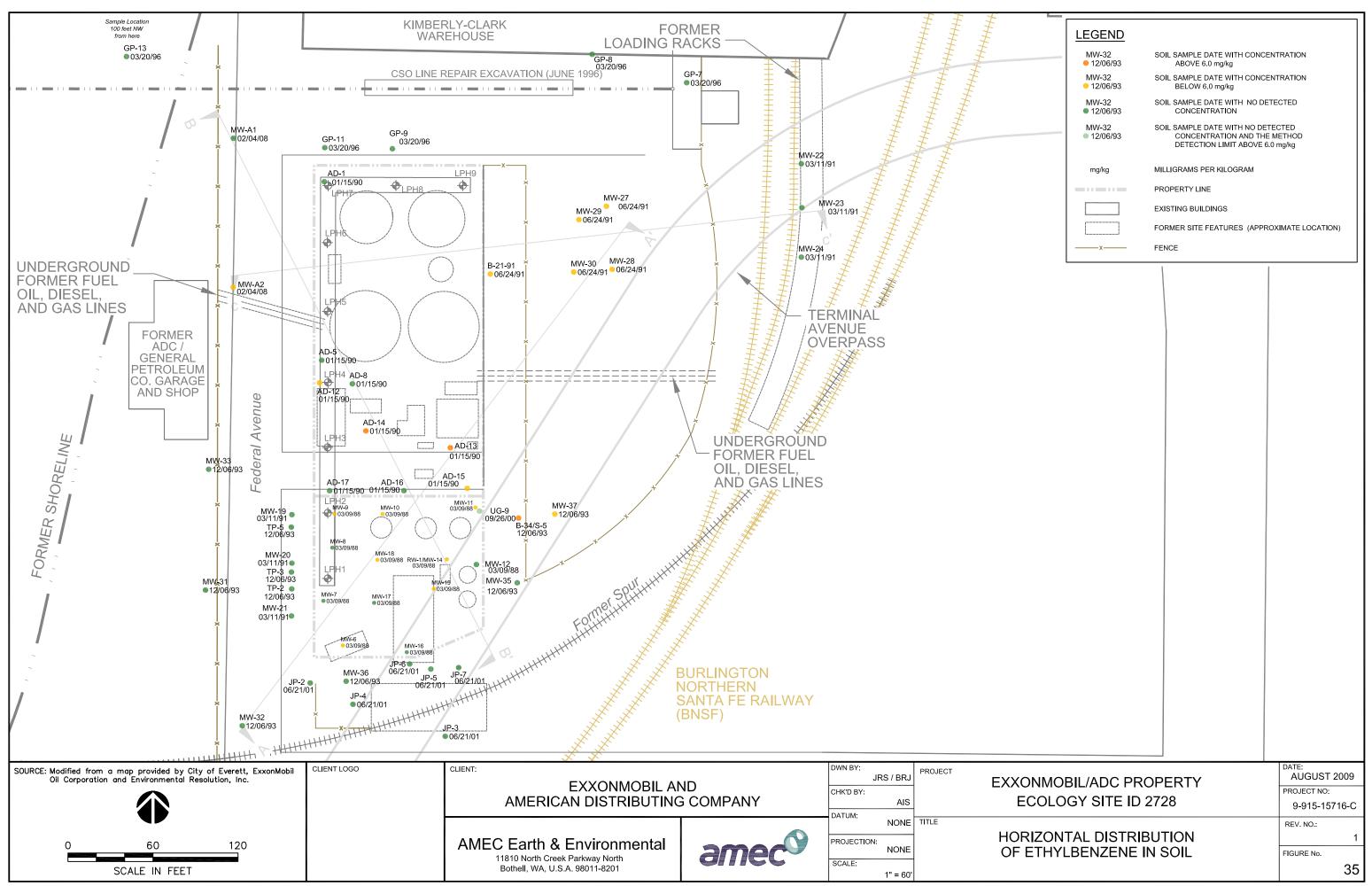


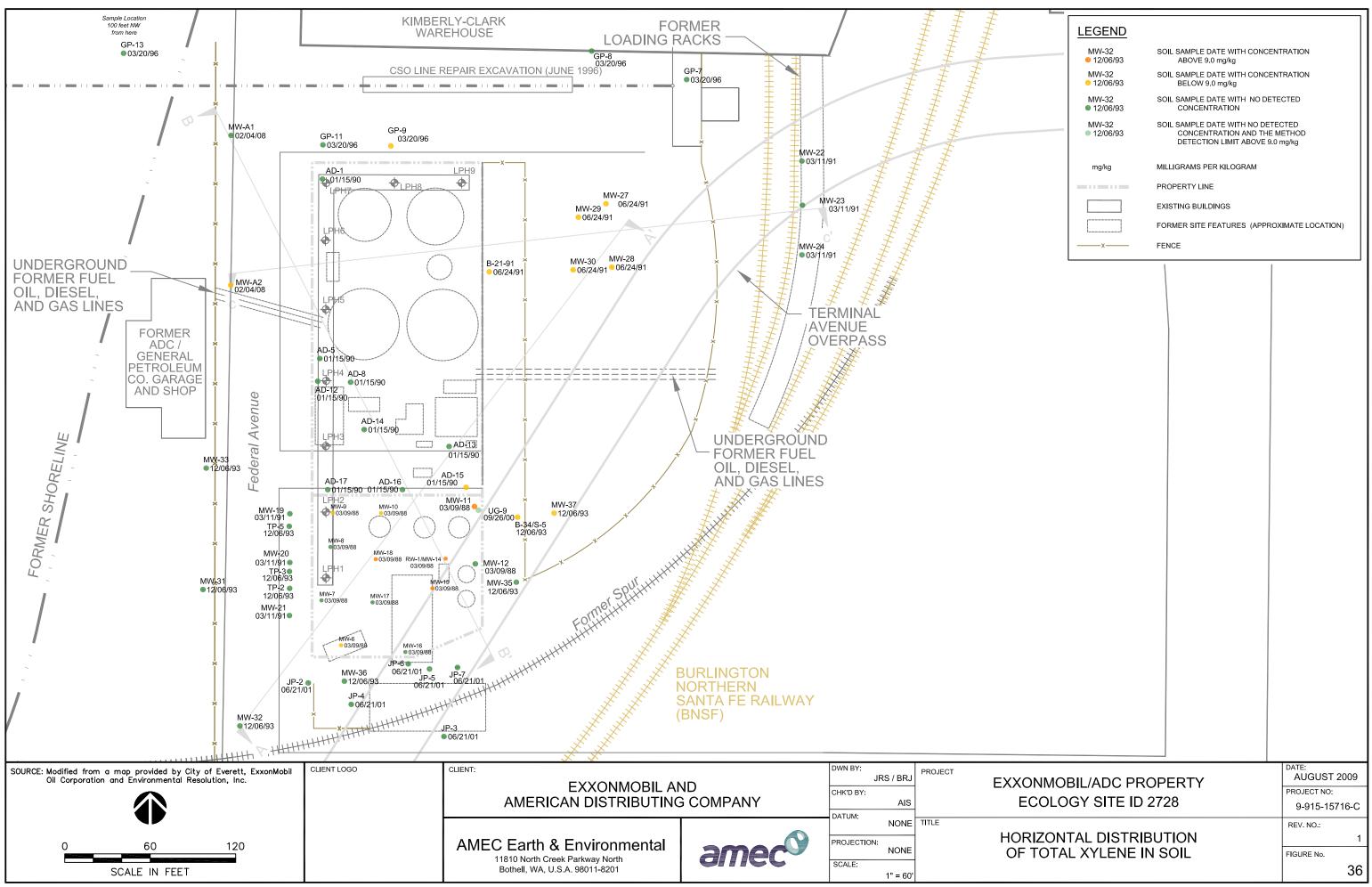


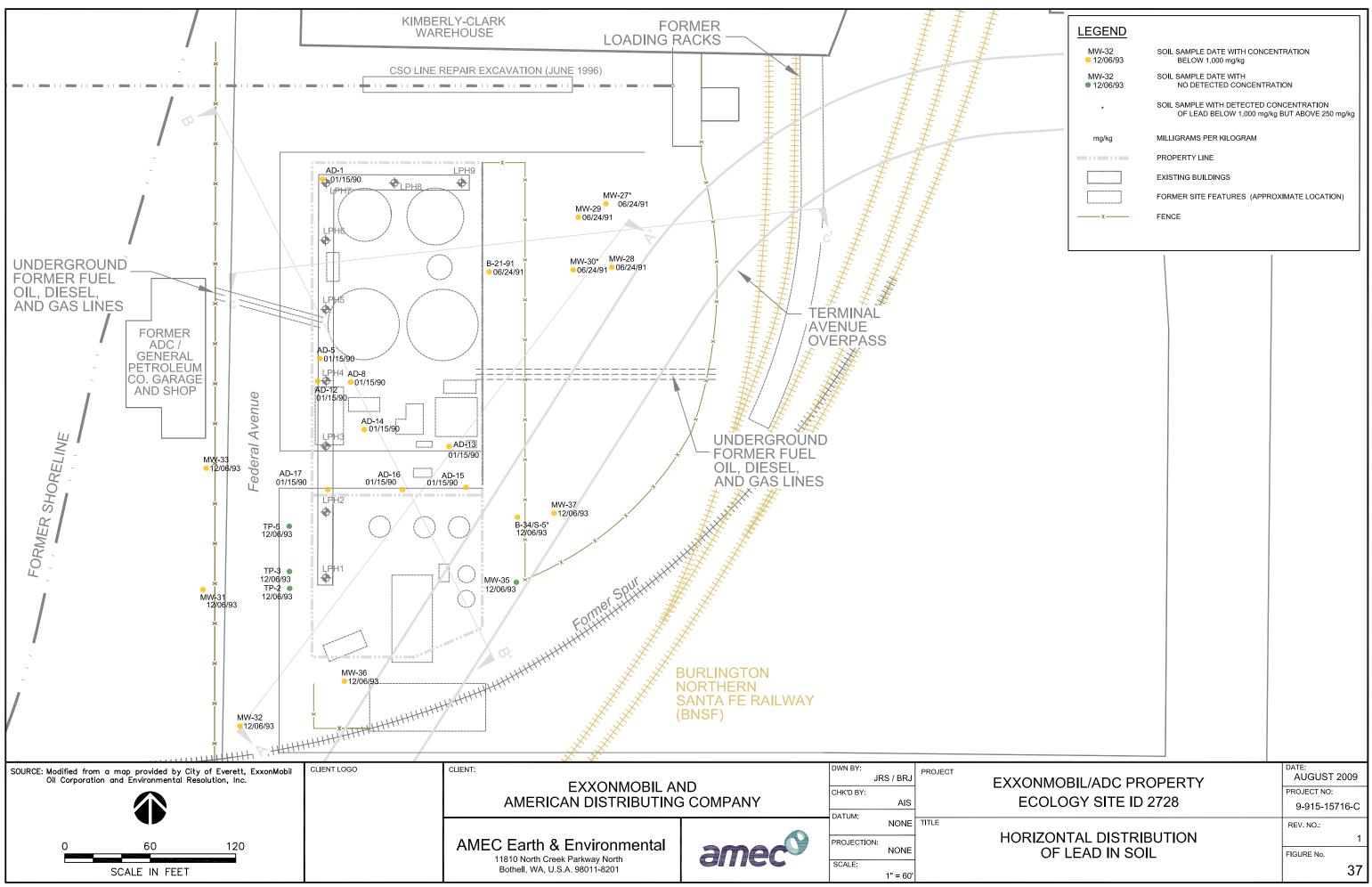


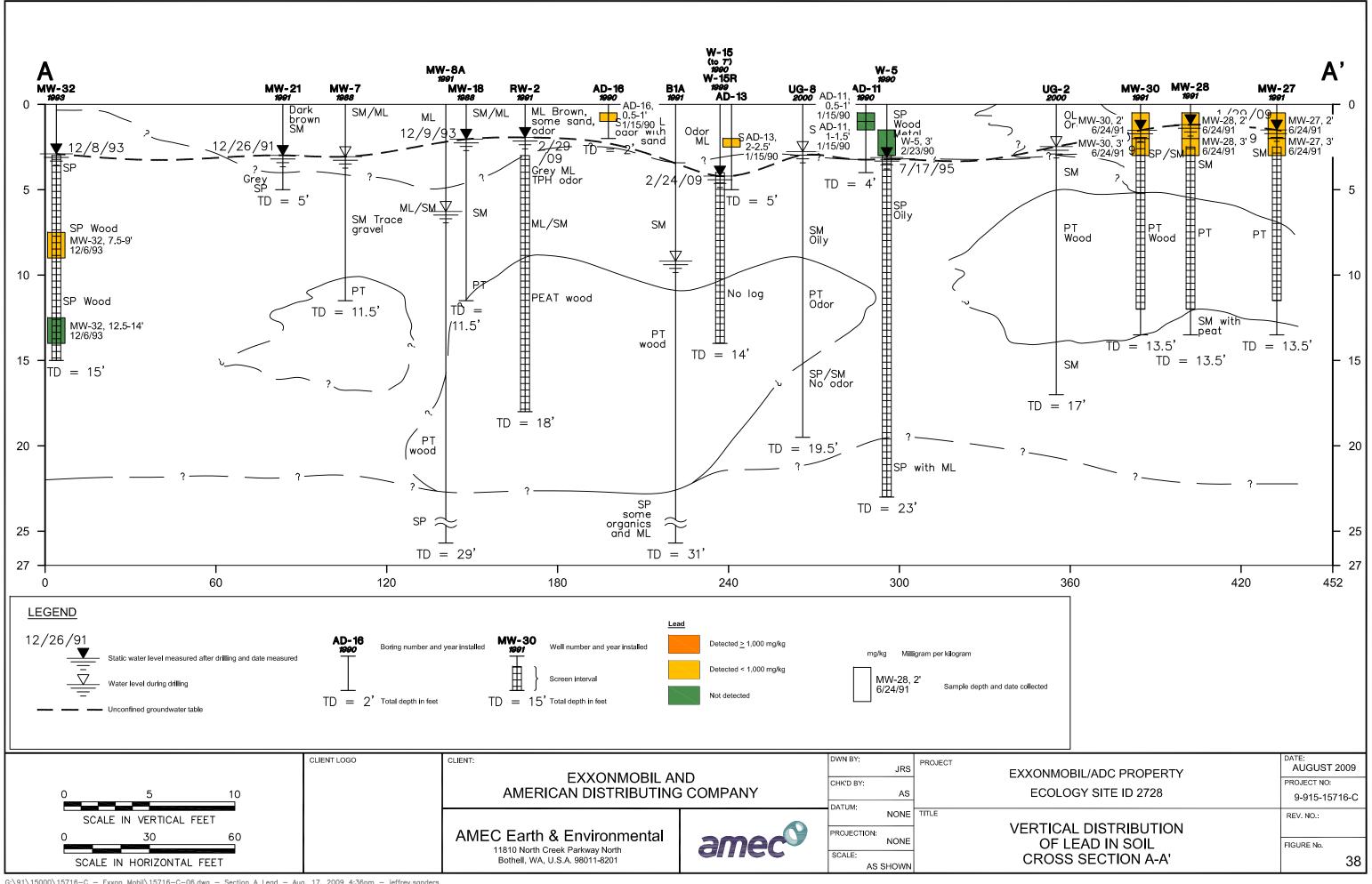


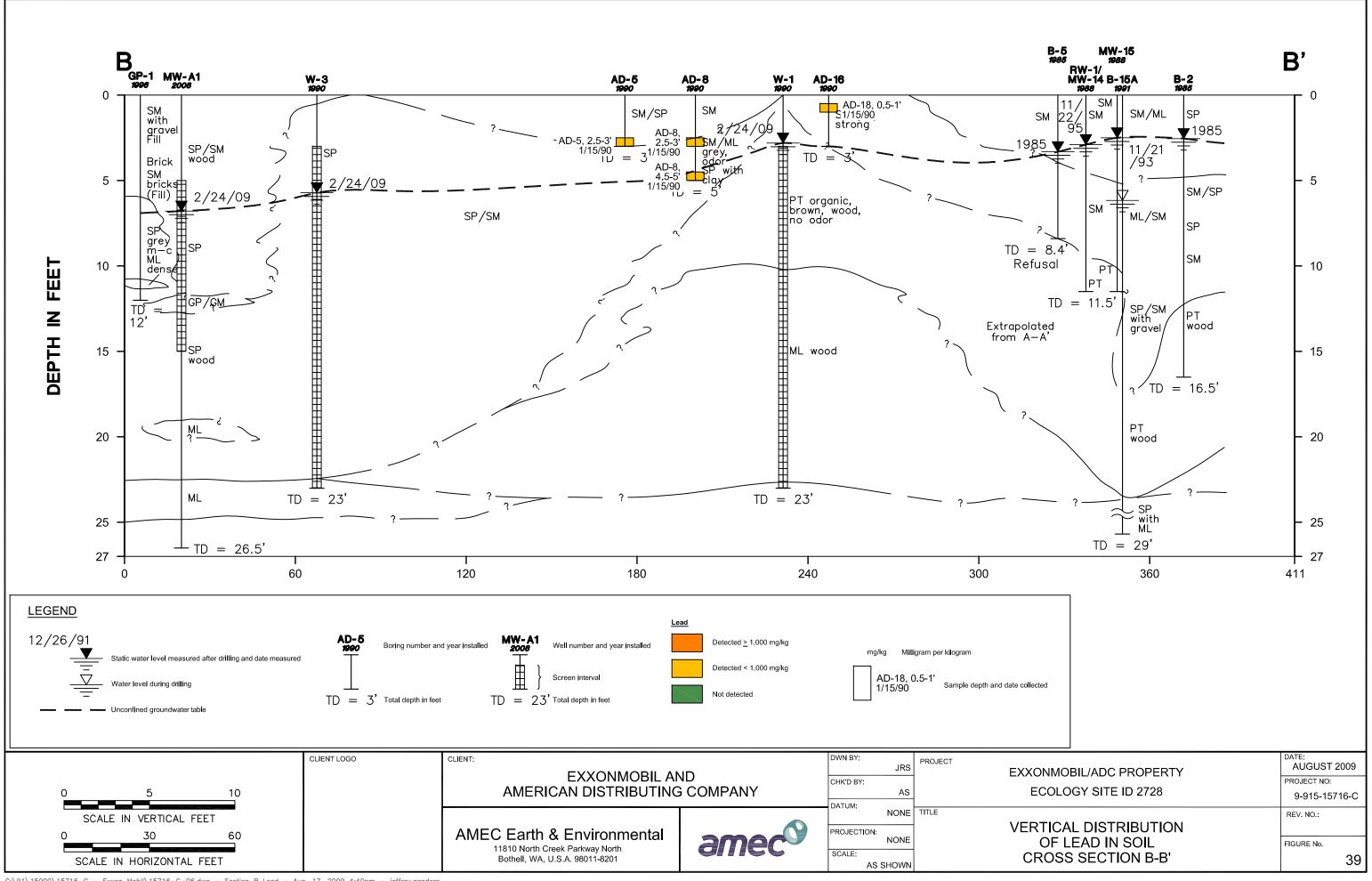


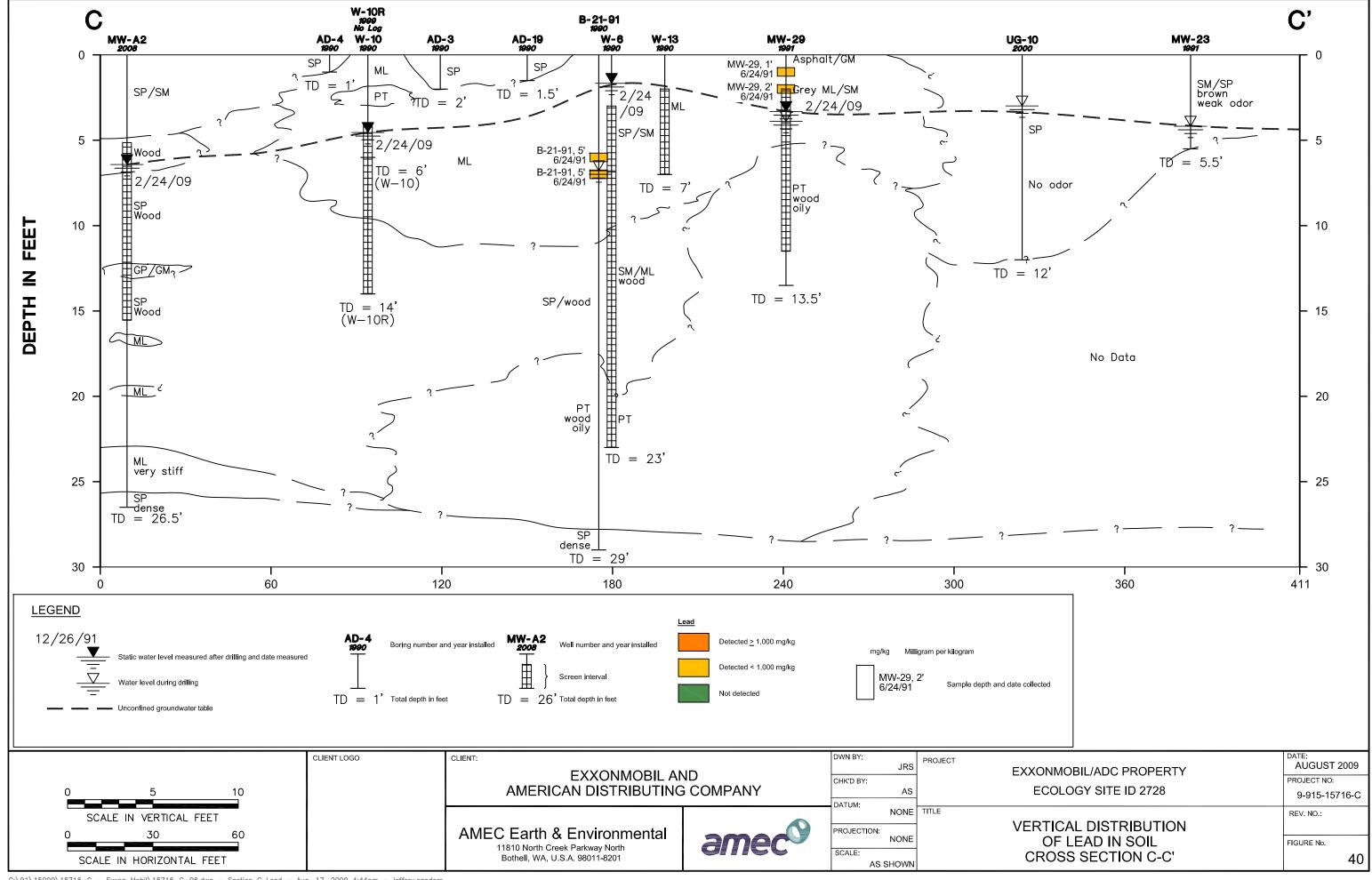


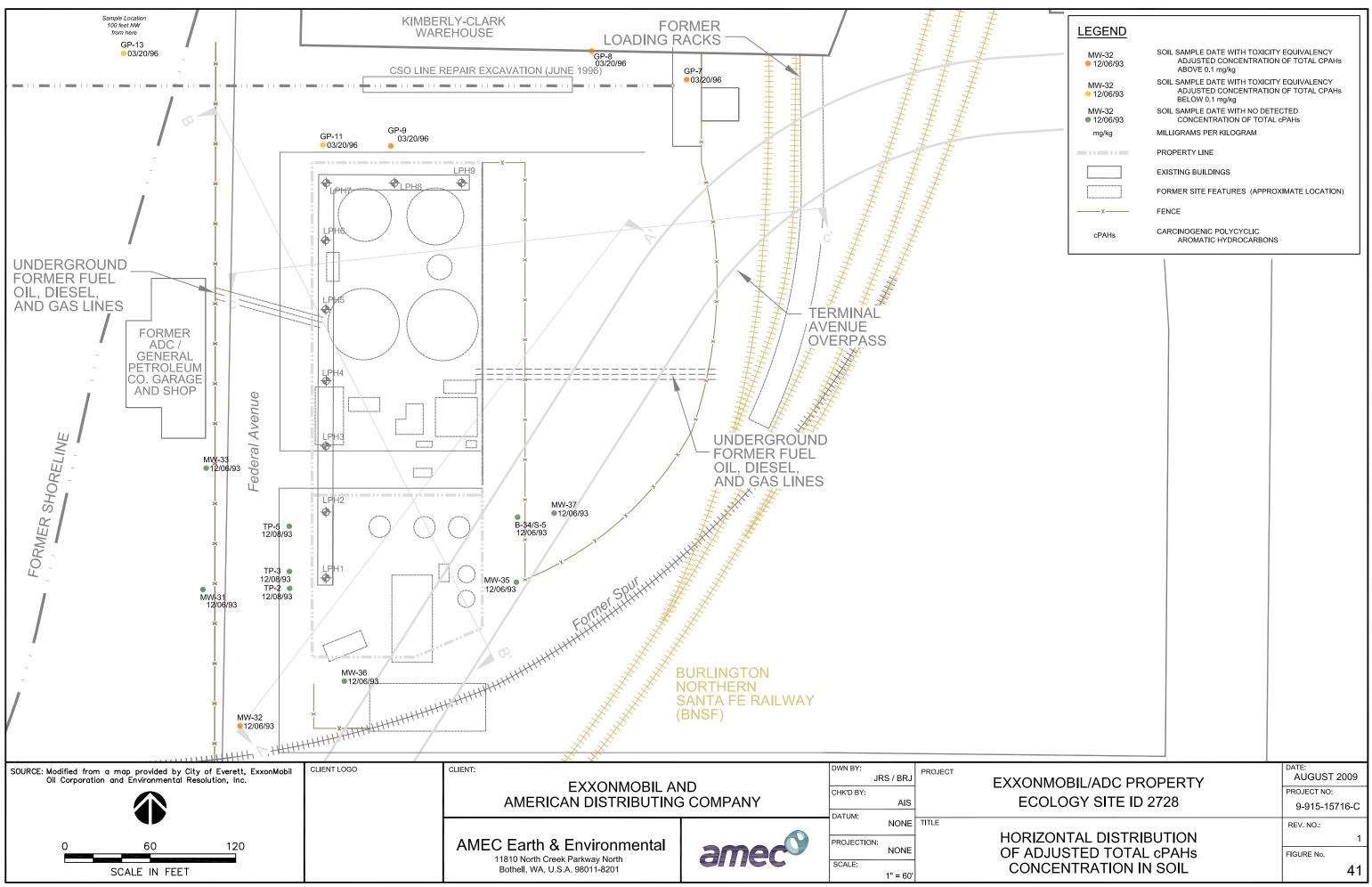


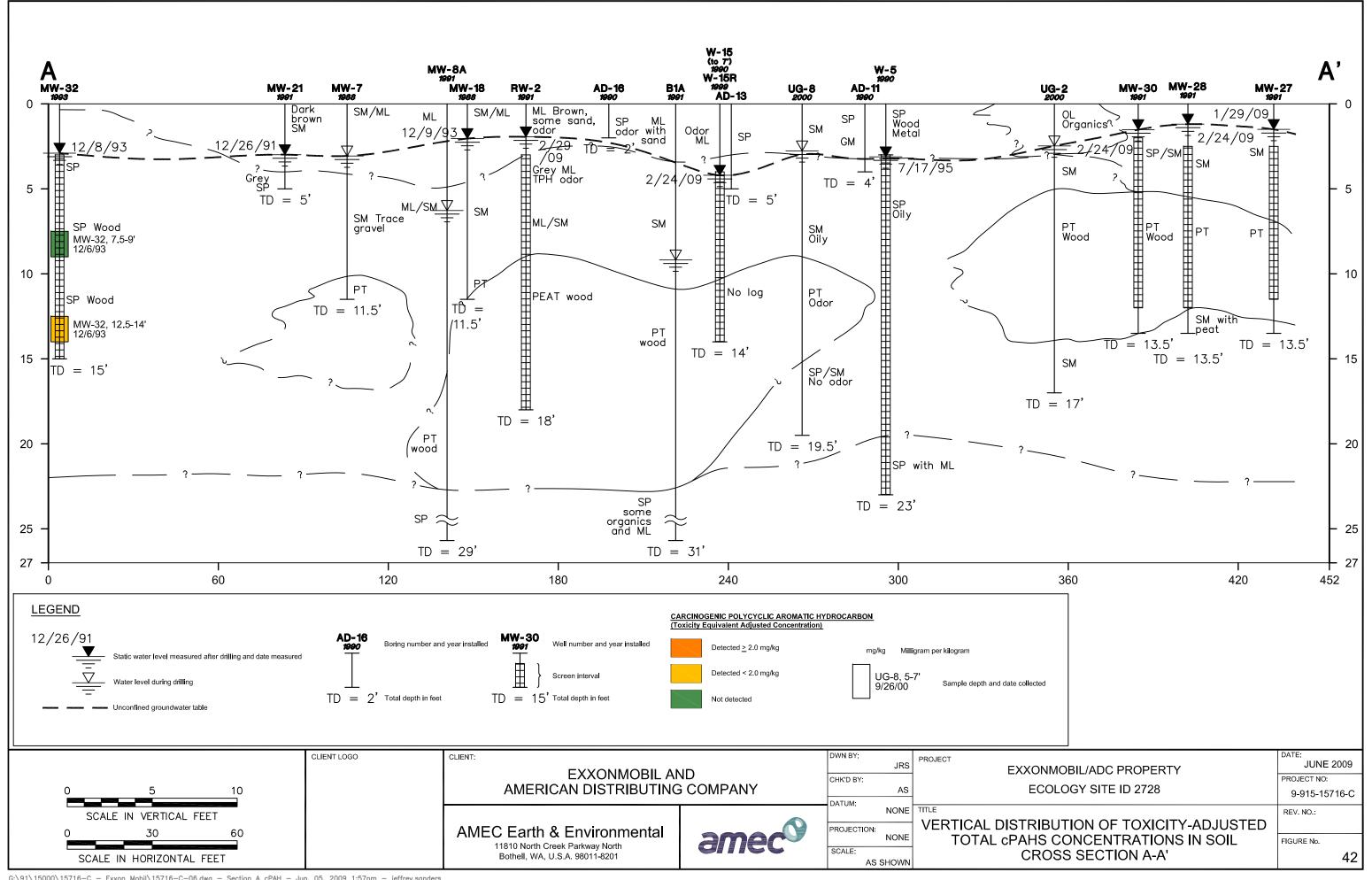


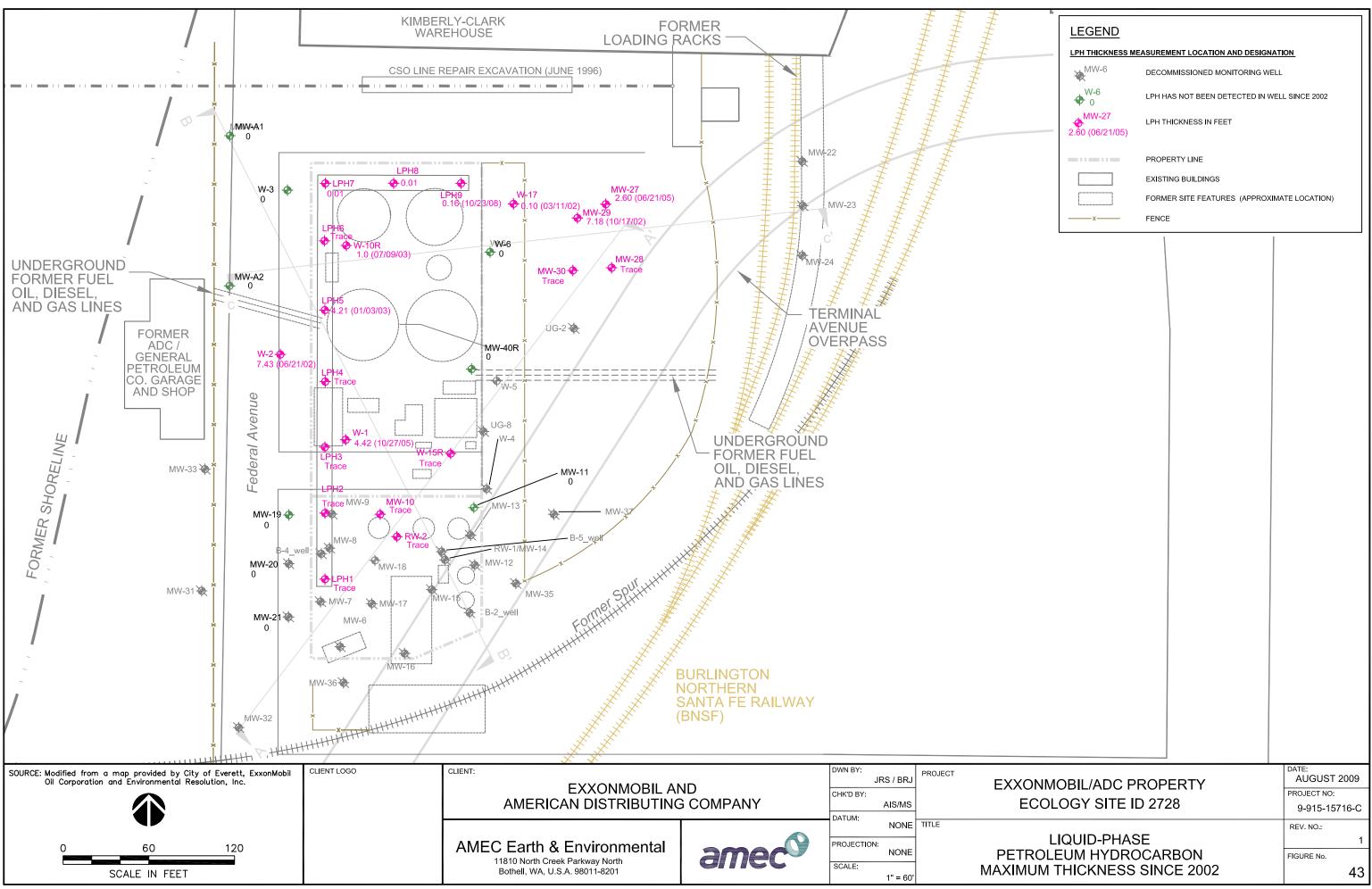


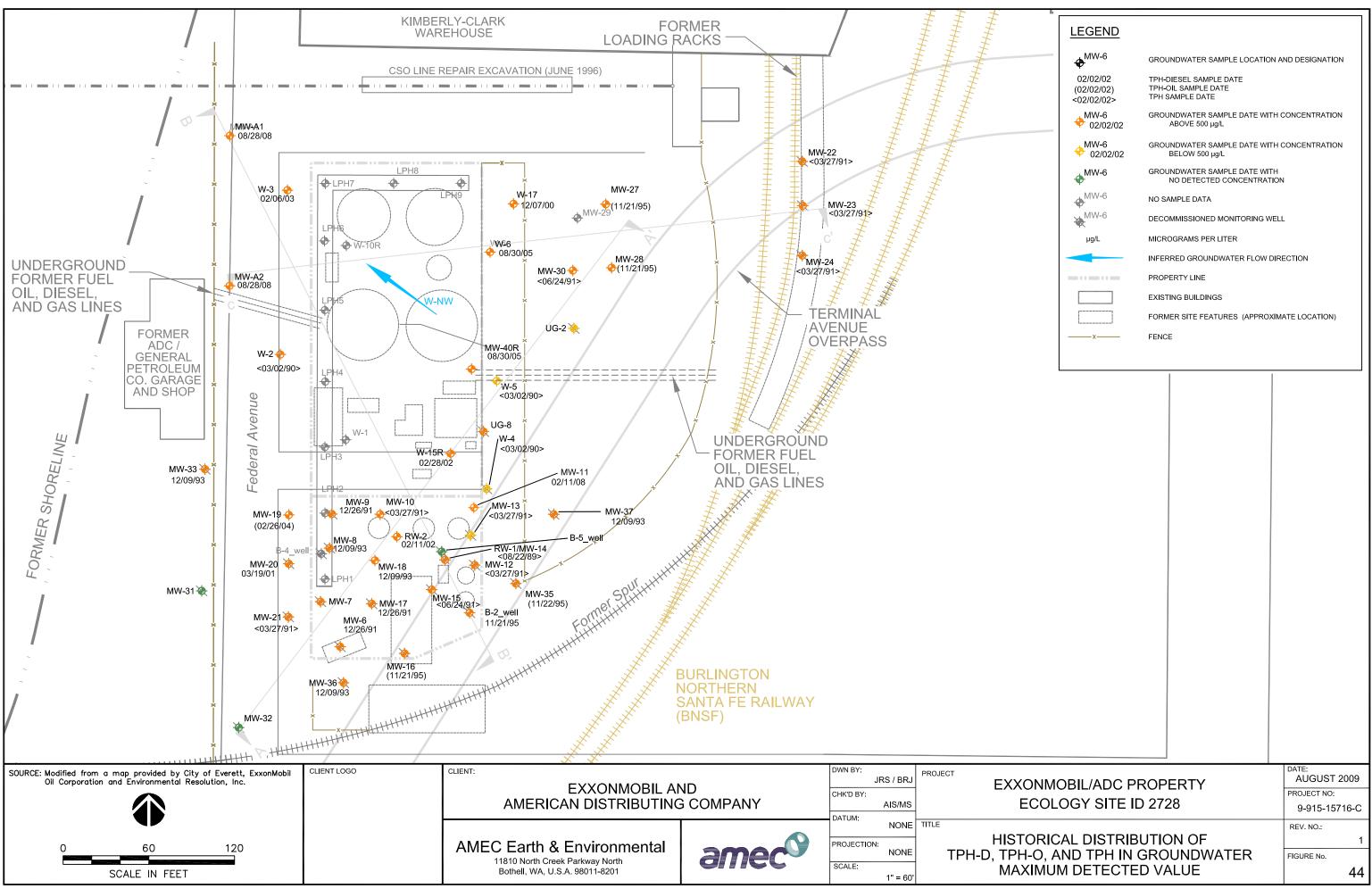


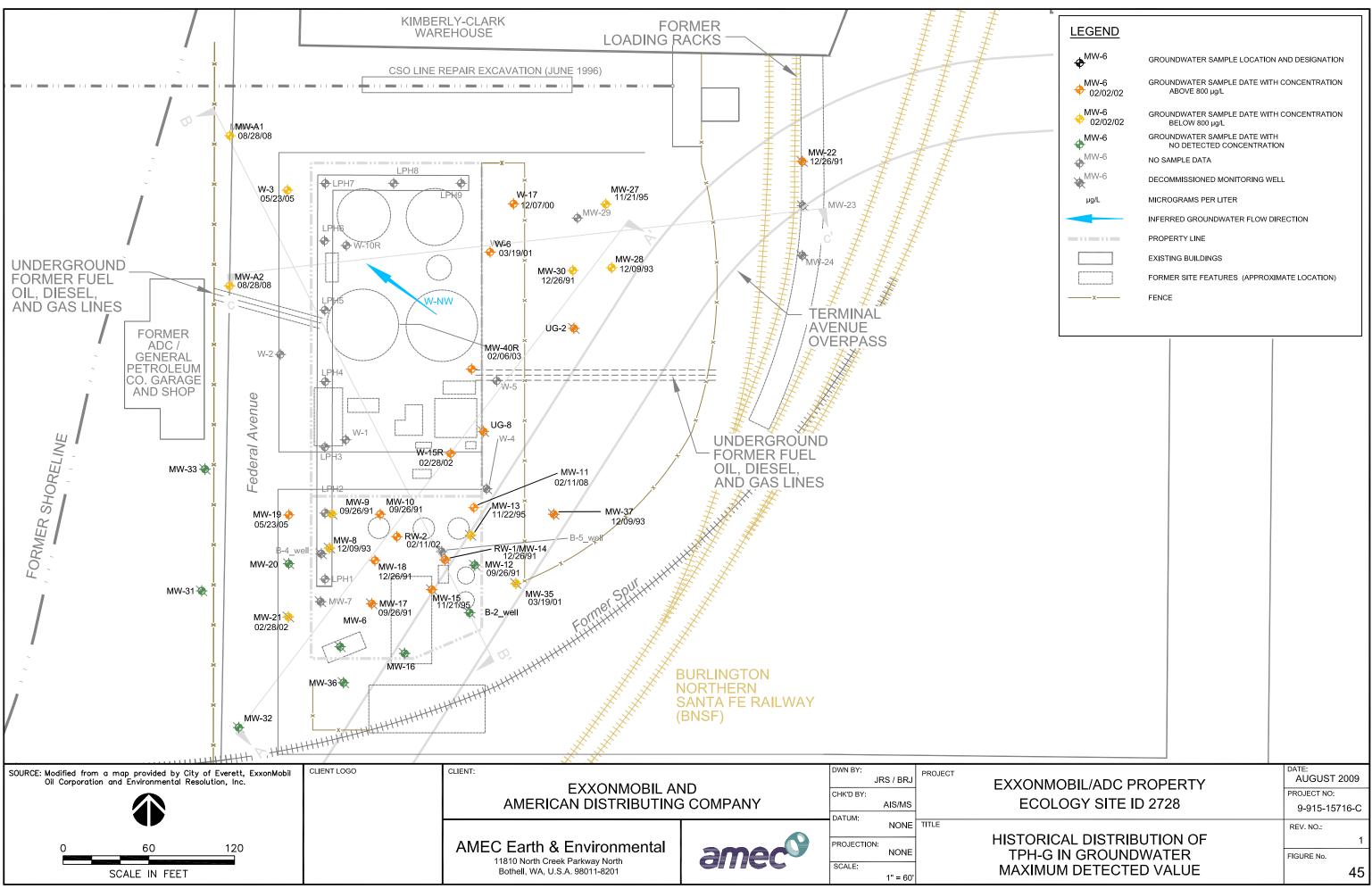


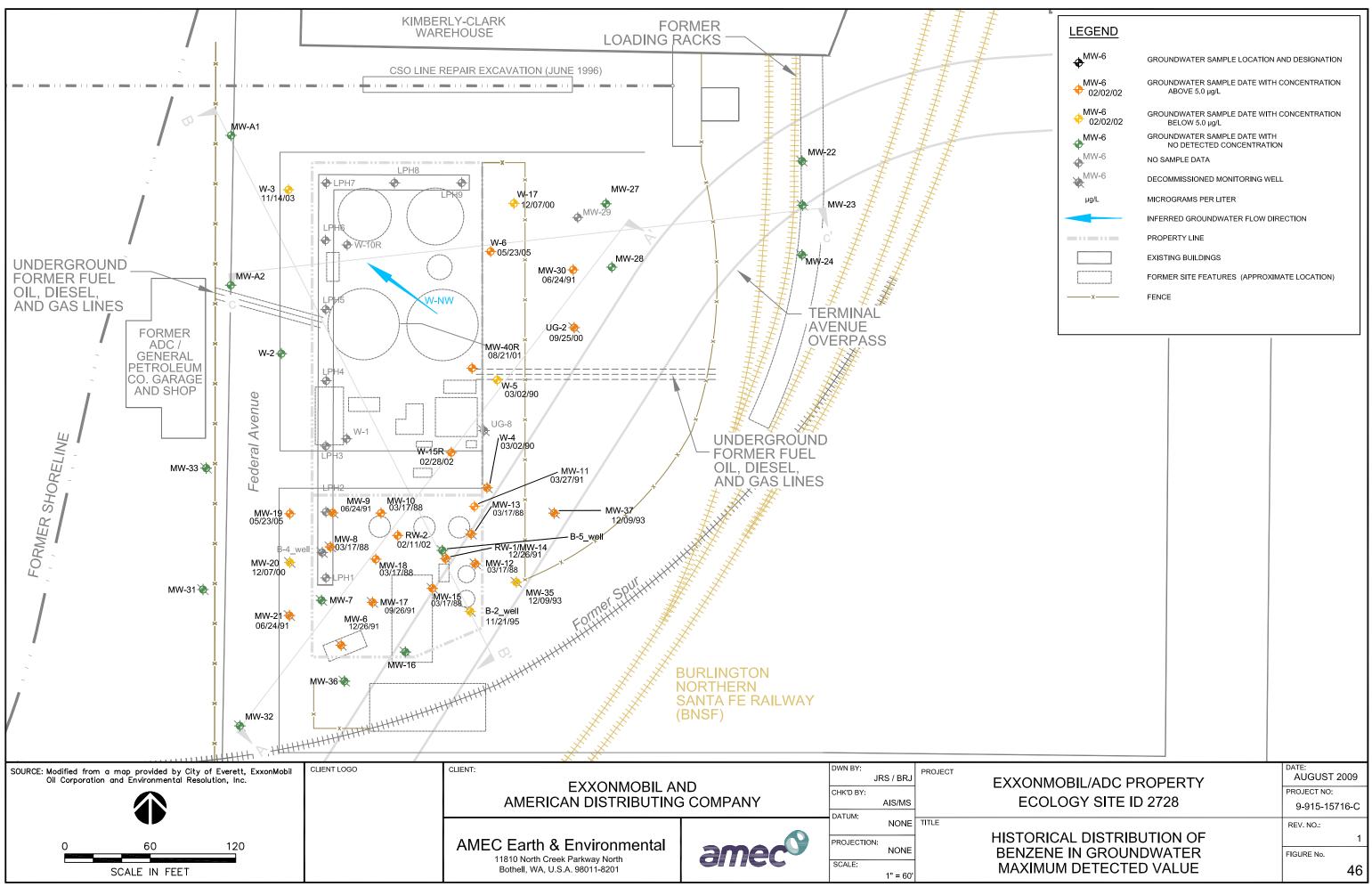


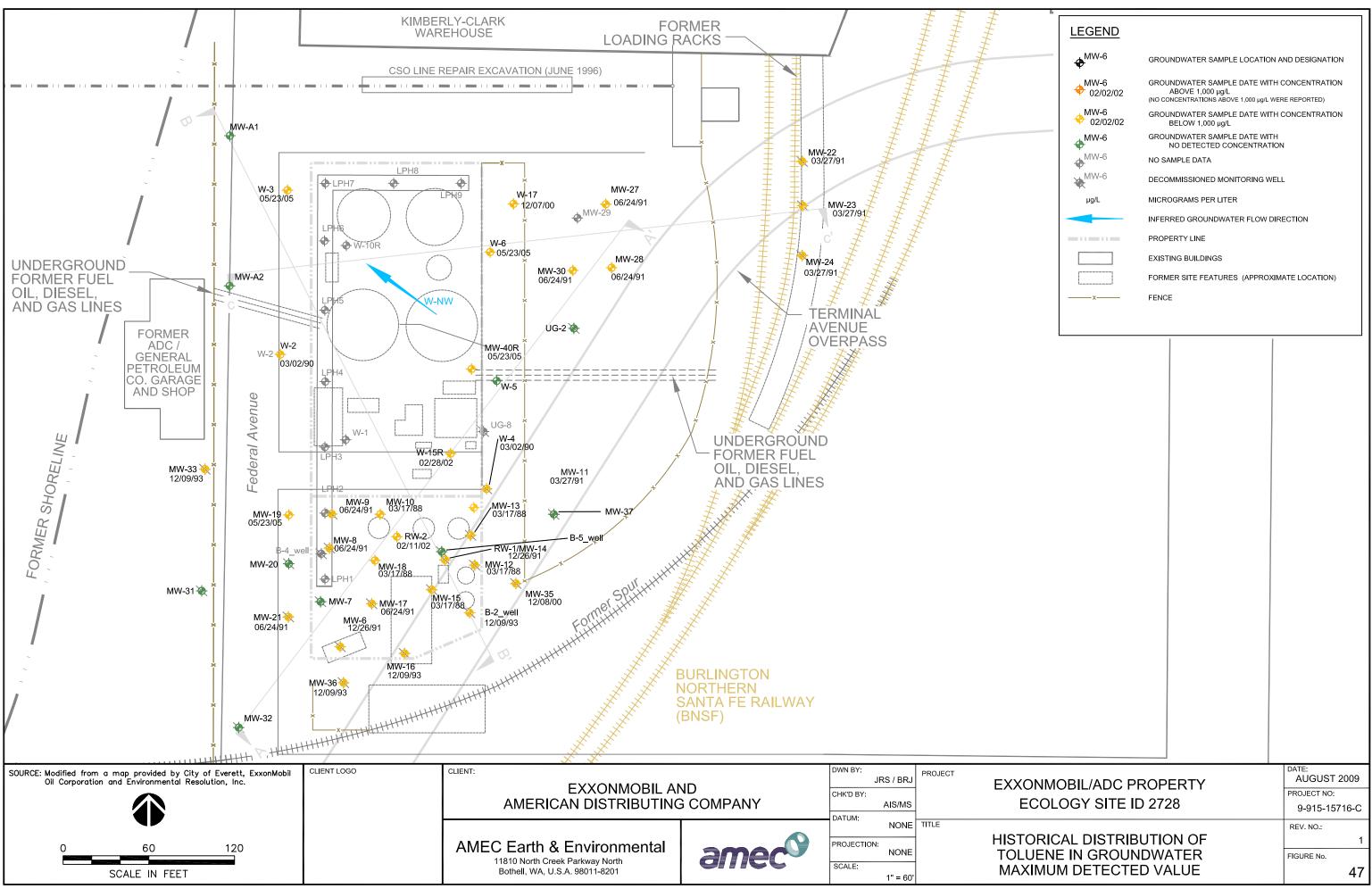


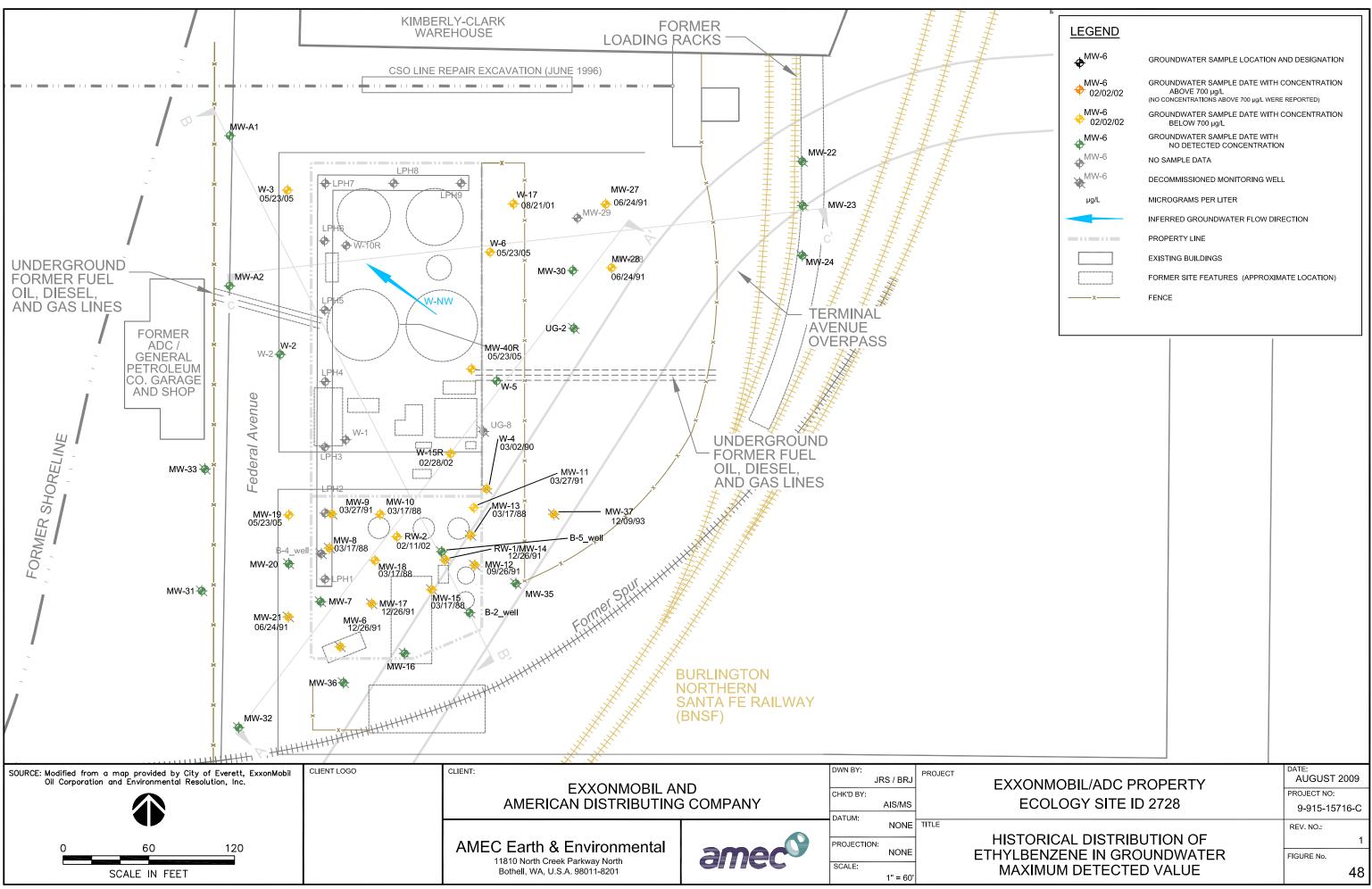


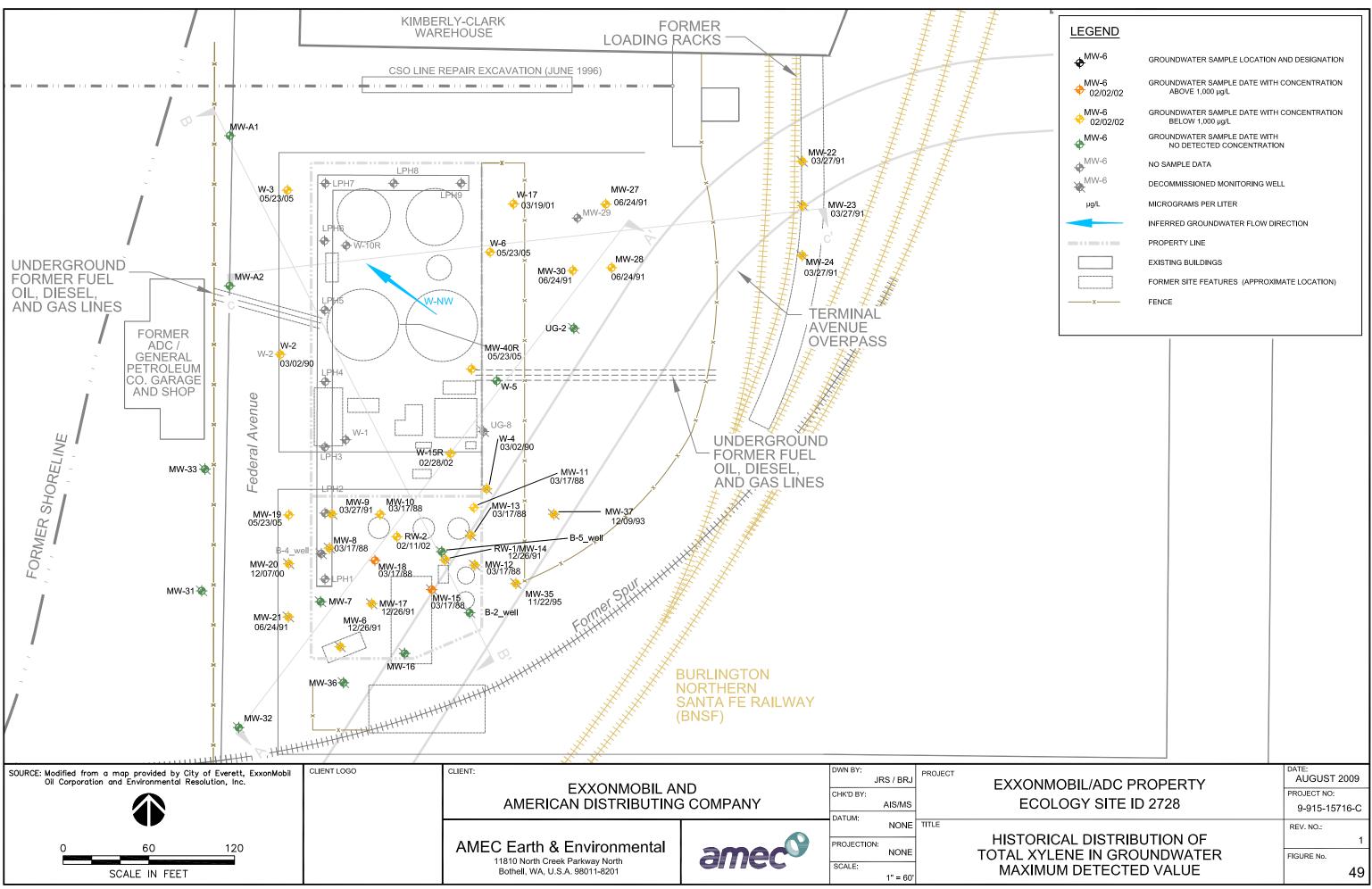


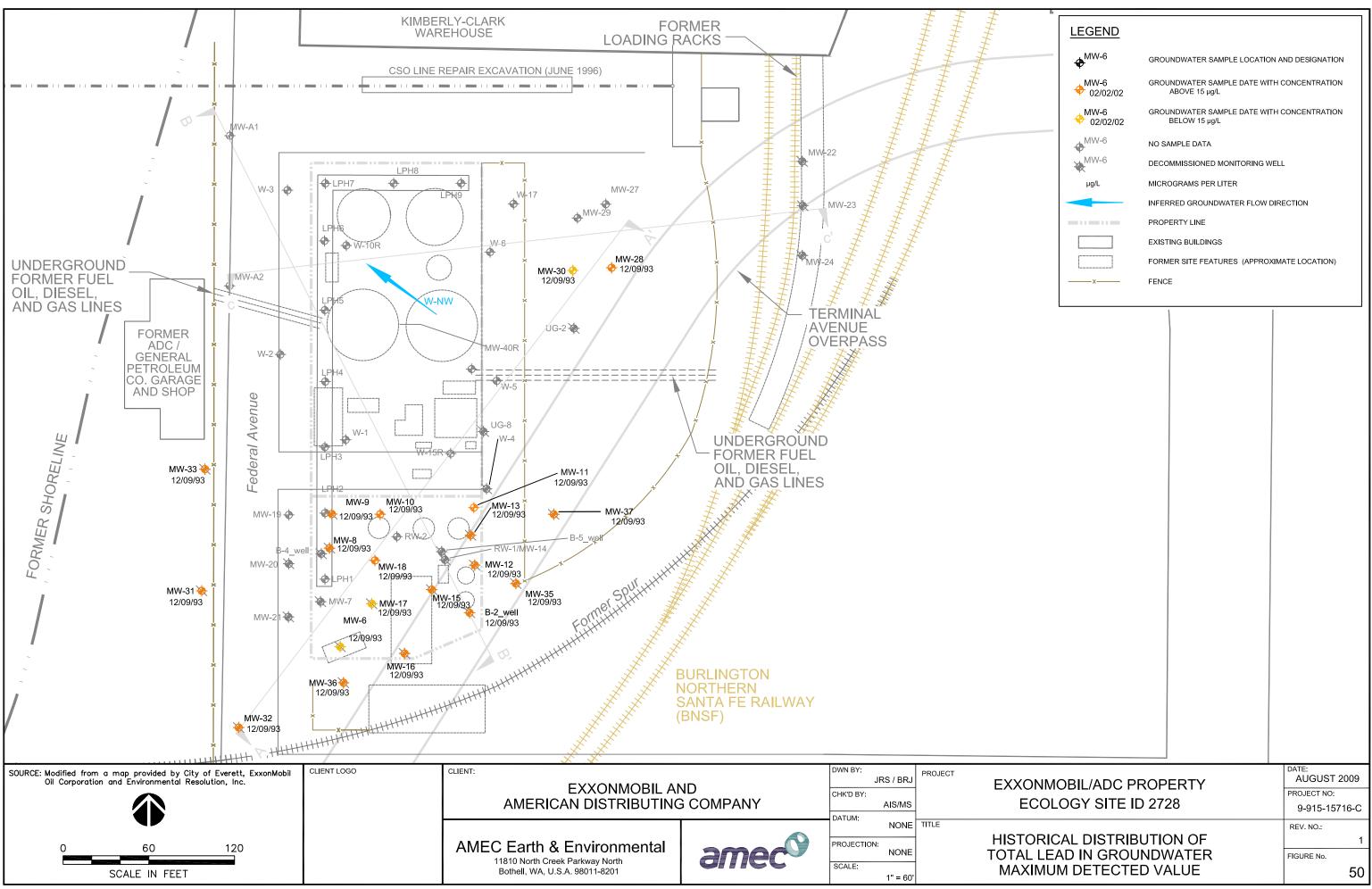


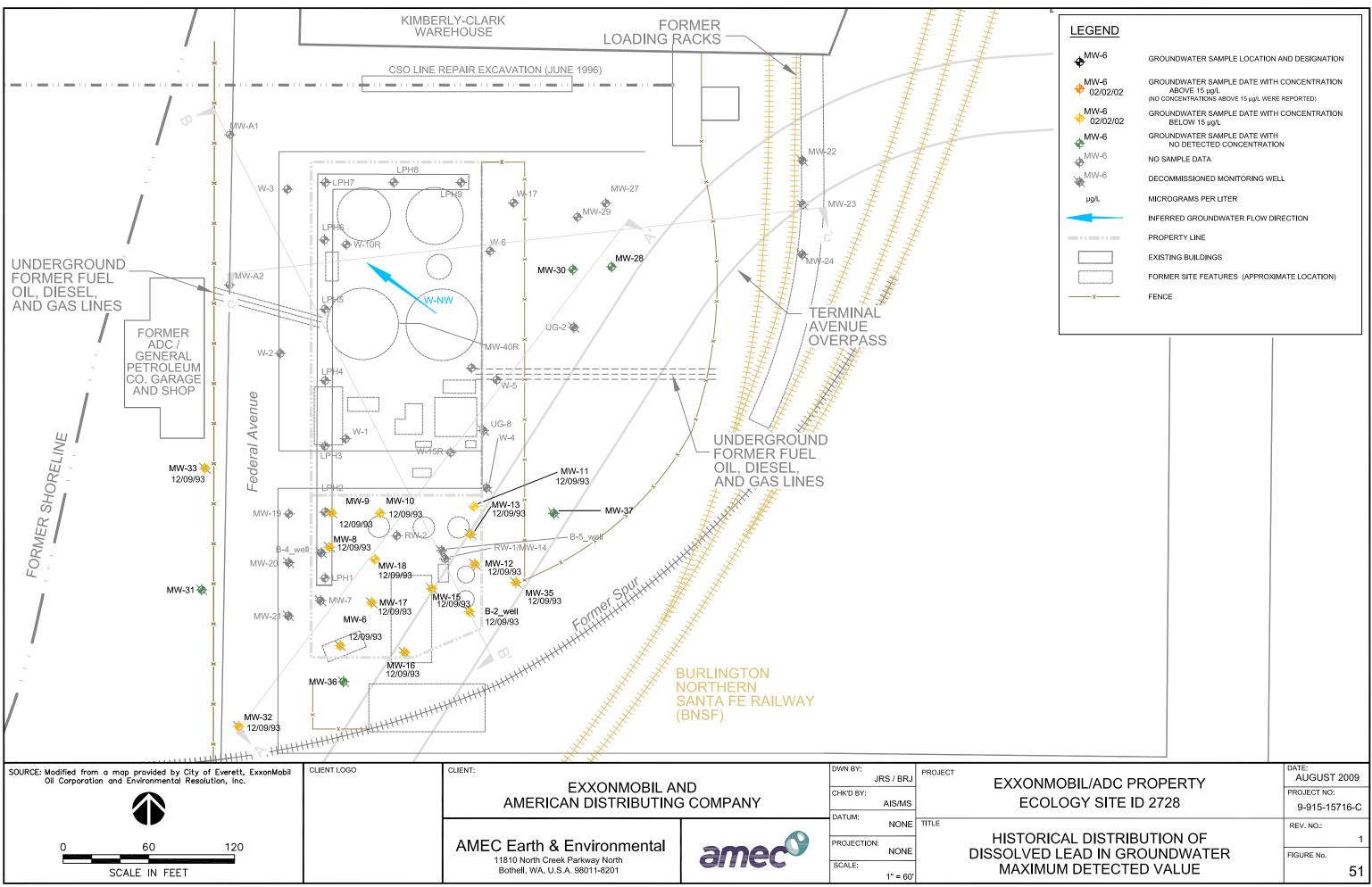


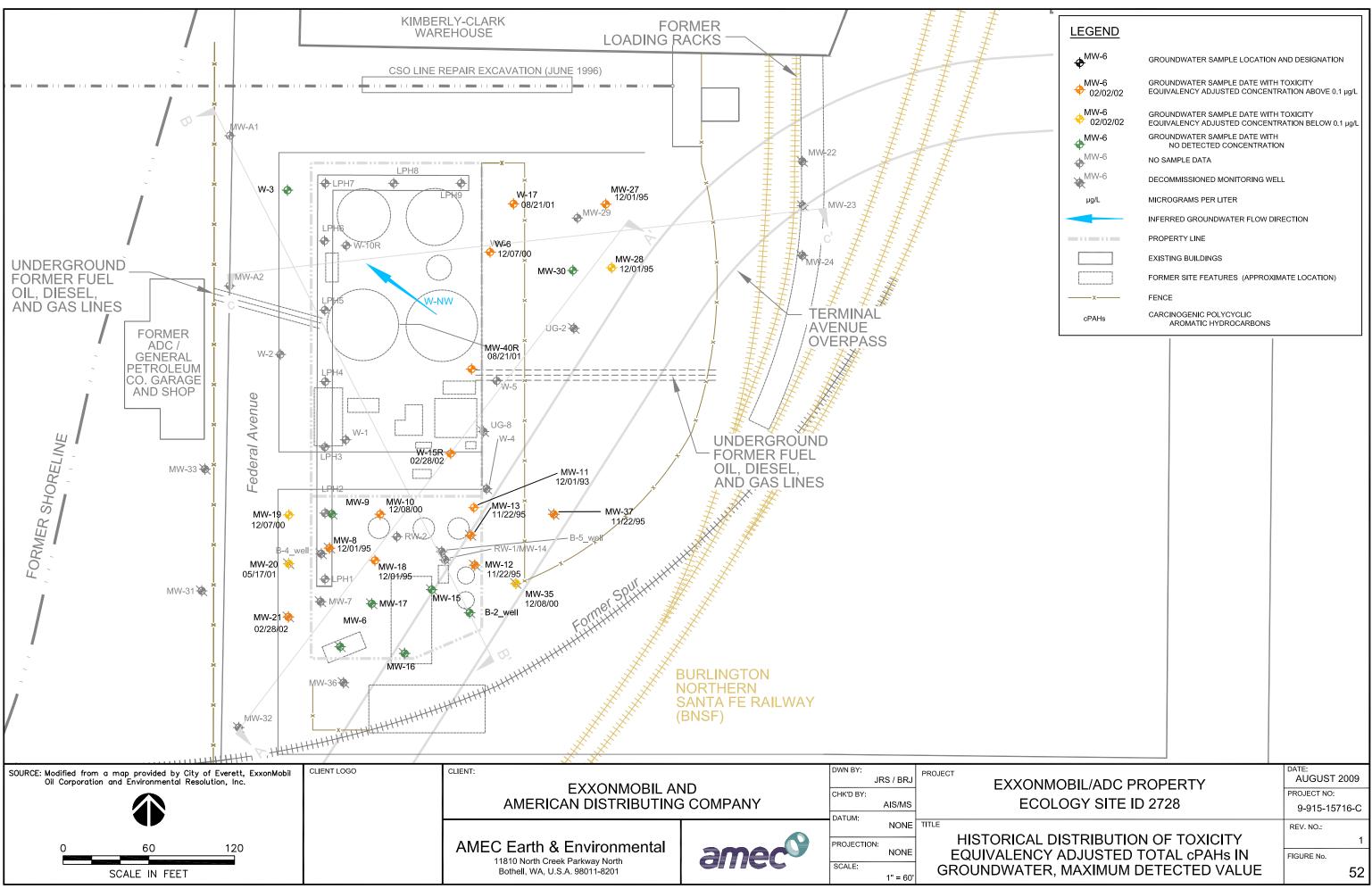


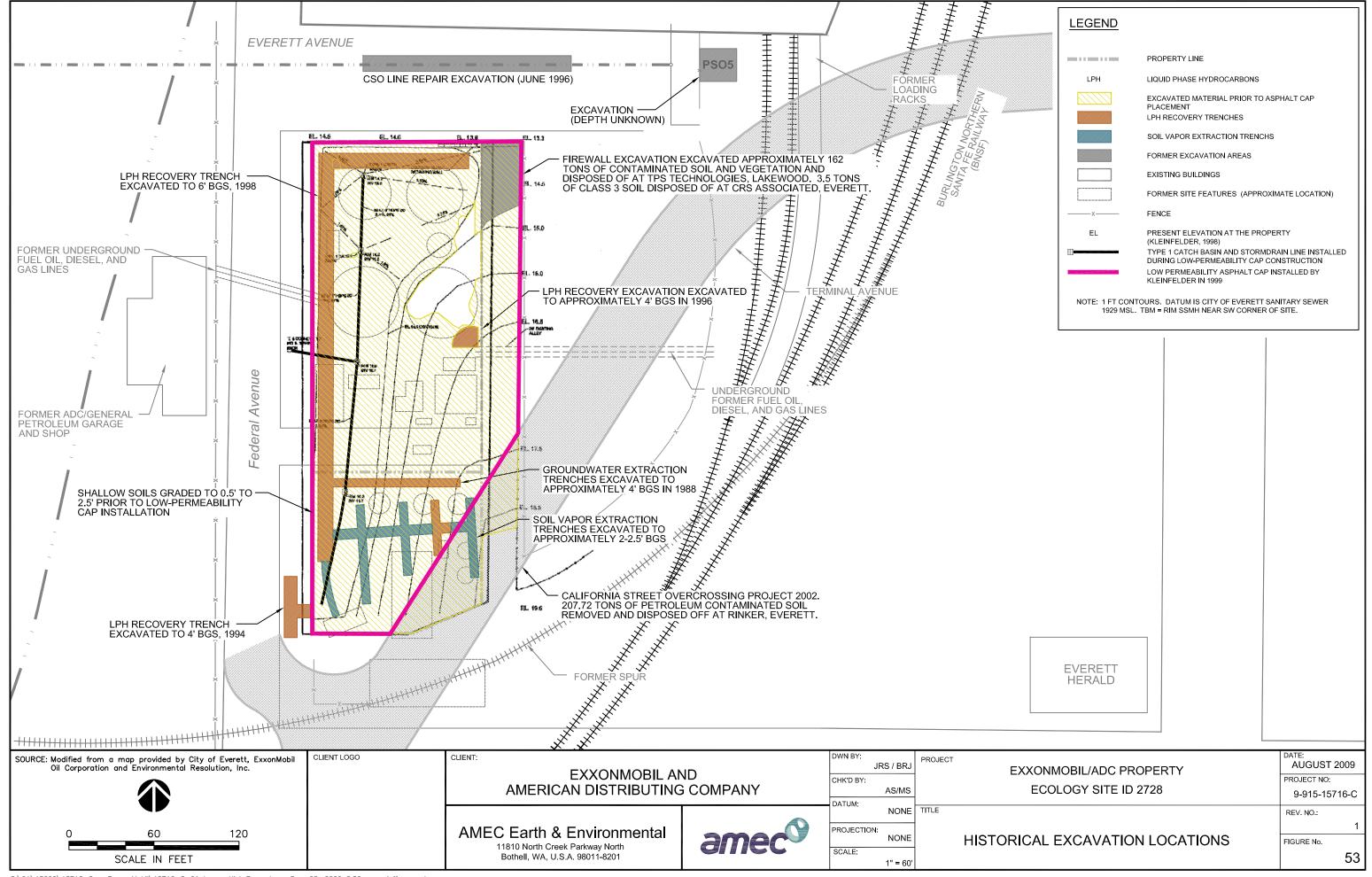


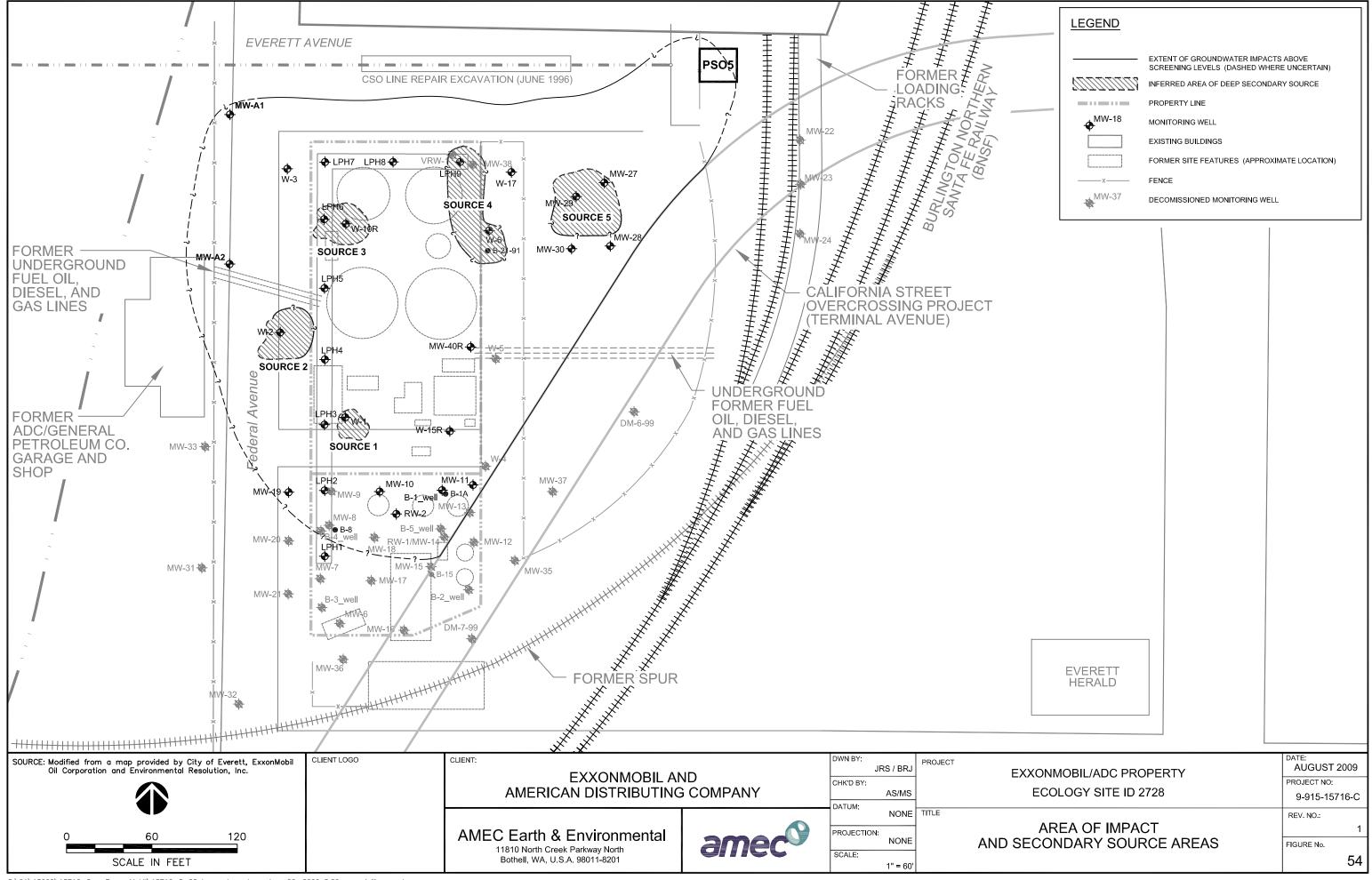












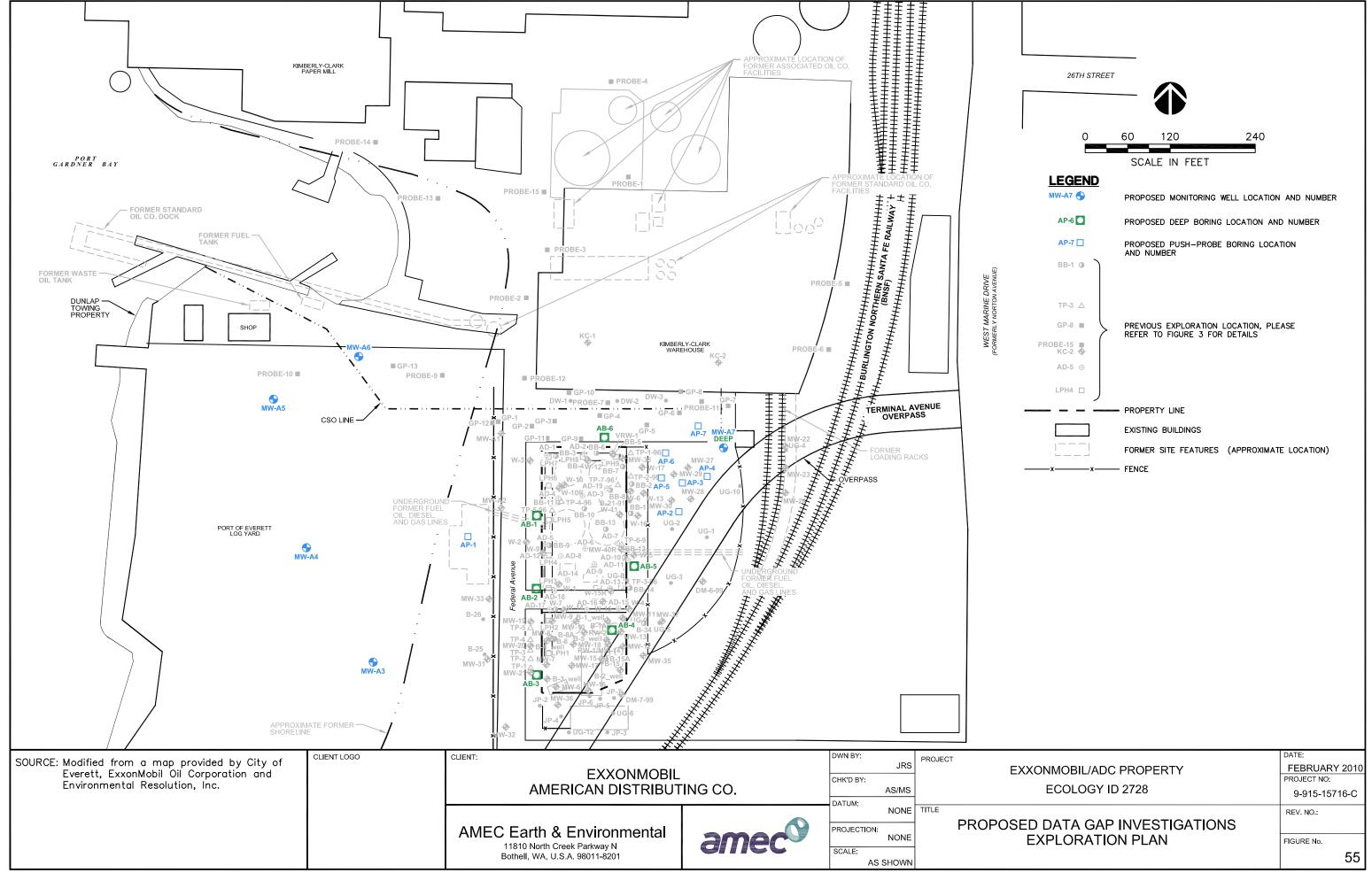


Table 1 **Chronology of Historical On-Site Environmental Investigations and Remedial Actions**

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
May-85	Rittenhouse- Zeman and Associates, Inc. (RZA)	ExxonMobil Parcel	NO. O. O. O. O. O. O. O. O. O. O. O. O. O	Borings, monitoring well installation	2-inch diameter monitoring wells B-1 through B-5 (MW-1 through MW-5 in several reports) installed.	B-1, B-2, B-4, and B-5. Petroleum odor noticed in borings, evidence found of contamination below groundwater table.
Mar-88	RZA	ExxonMobil Parcel		Borings, monitoring well installation	2-inch diameter monitoring wells MW-6 through MW-18 installed.	Soil and groundwater samples collected. LPH (1.29 feet) measured in MW-14.
Apr-88	RZA	ExxonMobil Parcel		Recovery trench installation, SVE and groundwater treatment system test (oil-water separator and air stripper)	Installation of recovery trench near MW-14, soil vapor extraction system and groundwater treatment system to evaluate feasibility of extracting LPH	Decommissioned in 1998 during construction of low- permeability cap at the Property.
May-88	RZA	ExxonMobil Parcel		Infiltration gallery, pumping subsurface fluids	Infiltration gallery installed in the vicinity of MW-14. Subsurface fluids were pumped with a vacuum truck from the sumps.	The gallery was T-shaped and 45 ft long with two 55 gal drums installed at both ends as sumps. 1,400 gal of liquid removed, 50 gal was LPH. As a result, LPH thickness in MW-14 decreased to 0.40 ft by August 1988.
Mar-89	RZA	ExxonMobil Parcel		Automated groundwater extraction and treatment system	An automated groundwater extraction and treatment system was installed in the location of the infiltration gallery. The system included fluid extraction sump stationed in RW-1 (formerly MW-14), oil-water separator, air stripper, and reinfiltration gallery.	The groundwater extraction and treatment system was shut down in March 1990 due to flooding of the re-infiltration gallery, and has not been restarted.

Table 1 Chronology of Historical On-Site Environmental Investigations and Remedial Actions

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Jan-90	Environmental Science and Engineering, Inc. (ESE)	ADC Parcel		Borings	Hand auger AD-01 through AD-19	Soil samples collected.
Feb-90	ESE	ADC Parcel		Borings, monitoring well installation	HSA borings W-1 through W-7. 2-inch diameter monitoring wells W-1 through W-6 installed.	W-7 was backfilled.
Jun-90	ESE	ADC Parcel		Hand-auger borings	Hand-auger borings W-8 through W-17 hand	No soil data found for W-8 through W-17.
Oct-90	RZA	ExxonMobil Parcel		Shallow grid soil sampling, bio-feasibility study	Hand auger B-1 through B-25. Two soil sample studies for the purpose of conducting a slurry flask bio-feasibility study.	0-3 ft bgs. Rapid biodegradation of TPH-G fraction was observed. Biodegradation of TPH (undifferentiated) was not achieved.
Nov-90	Unknown	ExxonMobil Parcel		Monitoring wells decommissioning	B-3 (MW-3), B-4 (MW-4), and MW-7 destroyed	No documentation of well decommissioning.
Mar through June-91	RZA	Parcels surrounding ExxonMobil Parcel		Borings, monitoring well installation	2-inch diameter monitoring wells MW-19 through MW-24 and 4-inch diameter monitoring wells MW-27 through MW-30 installed. Soil boring B-21-91 advanced.	MW-25 and MW-26 were inaccessible or dry and later renamed as B-25 and B-26. No well decommissioning records were found.
Jun-91	RZA and ESE	The Property		Quarterly groundwater monitoring	Groundwater monitoring event. New 2-inch diameter monitoring wells MW-25 and MW-26 installed. Gauged wells: RW-1, B-1, B-2, B-5, MW-6, MW-8 through MW-13, MW-15 through MW-18, AD-19, W-1 through W-6, and W-8 through W-15.	B-1, MW-8, AD-19, W-1, W-6, W-9, W-11, W-12, W-13, and W-15 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA.

Table 1 Chronology of Historical On-Site Environmental Investigations and Remedial Actions

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Date Nov-91	Consultant RZA AGRA	Location ExxonMobil	Reference	Activities Borings, recovery well	Tasks Performed 8-inch diameter recovery	Notes Soil borings advanced in
1107 01	1021710101	Parcel		Bornigo, rocovery wen	well RW-2 installed. Deep soil borings B-1A, B-8A, and B-15A advanced.	vicinity of existing wells B-1, B-8, and B-15. No analytical data found for this event.
Dec-91	RZA AGRA Earth & Environmental, Inc. (RZA AGRA)	ExxonMobil Parcel		Quarterly groundwater monitoring, aquifer and tidal study	Quarterly groundwater monitoring. Gauged wells: RW-1, B-1, B-2, B-5, MW-6, MW-8 through MW-13, MW-15 through MW-30, and AD-19. 24-hour pumping from MW-10 at a rate of 1 to 2 gpm and measuring response in MW-18, RW-1, and RW-2 for 48 hours.	B-1, MW-8, MW-11, MW-26, MW-27, MW-29, and AD-19 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA. Hydraulic conductivity at the Site was estimated as 4 to 9.5 ft/day. Minimum tidal influence was observed.
1992	RZA AGRA			Discussions with Ecology	Ecology discussed enforcement with Mobil and RZA AGRA. Ecology decided to allow site to go independent.	
Dec-93	RZA AGRA	West of ExxonMobil Parcel		Off-Property borings, monitoring well installation, GPR survey	2-inch diameter monitoring wells MW-31 through MW-33 and MW-35 through MW-37 were installed; B-34 advanced and backfilled. GPR survey was conducted to assess whether underground product lines had been removed.	Survey did not identify any subsurface linear features.
Dec-93	RZA AGRA	ExxonMobil Parcel and off- site property to the west		Quarterly groundwater monitoring	Groundwater monitoring event. Gauged wells B-1, B-2, MW-6, MW-8 through MW-13, MW-15 through MW-18, MW-27 through MW-33, MW-35 through MW-37.	B-1, MW-27, and MW-29 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA.

Table 1 **Chronology of Historical On-Site Environmental Investigations and Remedial Actions**

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Dec-93	RZA AGRA	West of ExxonMobil Parcel		Test pits, recovery trench	Excavated five test pits TP-1 through TP-5. Recovery trench installation along the western border of ExxonMobil Parcel.	Monitoring well MW-21 was decommissioned during the recovery trench installation activities. However, a 2002 decommissioning record was found that stated that MW-21 was decommissioned in 2002.
1995				Agreed Order DE- 95TC-N402		Required evaluation of LPH.
Jul-95	RZA AGRA	ADC Parcel		Quarterly groundwater monitoring	Groundwater monitoring event. Gauged wells: W-3, W-5, W-9, W-10, W-12 through W-15.	W-9, W-12, and W-13 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA.
Oct-95	U.S. Coast Guard Puget Sound Marine Safety Office & City of Everett	North of the Property		Investigation of petroleum product discharge into Everett Harbor	Camera surveys of the sewer lines	Outfall located approximately 175 yards northwest of the ADC parcel, section of Combined Sewer Outflow (CSO) line with LPH seepage.
Nov-95	RZA AGRA	Site		Groundwater monitoring	Groundwater monitoring event. Gauged wells: RW-1, B-1, B-2, MW-6, MW-8 through MW-13, MW-15 through MW-18, and MW-27 through MW-37.	B-1, MW-18, MW-29, and MW-30 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA.
Dec-95	RZA AGRA	Site		Groundwater monitoring	Groundwater monitoring event. Gauged wells: RW-2, B-2, MW-8, MW-9, MW-18, MW-15 through MW-18, MW-27, and MW-28.	RW-2, MW-9, MW-18, and MW-28 contained LPH and were not sampled. Results are presented in April 4, 1996, Groundwater Monitoring and Sampling Report by AGRA.

Table 1 Chronology of Historical On-Site Environmental Investigations and Remedial Actions

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Mar-96	AGRA	North of the Property		Borings	Direct-push soil borings GP-1 through GP-13. Borings associated with the CSO line repair.	The collected soil sample results indicated that soil surrounding the damaged portion of the CSO line were impacted with petroleum hydrocarbons. LPH accumulation was noticed in temporary screens installed in soil borings. No groundwater samples were collected from temporary screens.
Apr-96	City of Everett			Meeting	Meeting held to discuss options for repairing the section of CSO line.	Replacement of the settled portion of the line and slip lining of the remaining portion of the line was decided.
May-96	AGRA	ADC Parcel		Borings	Bobcat borings BB-1 through BB-14.	Soil samples collected.
Jun-96	AGRA	North of the Property		CSO line repairs	Excavation of settled portion of pipe replaced. Slip-lining of remaining CSO line. CSO line excavation dewatering.	1,450,800 gal of groundwater and 23,050 gal of LPH were removed during CSO line excavation and dewatering.
Jun-96	AGRA	ADC Parcel		Borings, monitoring wells, and test pits	4-inch diameter recovery well VRW-1 and 2-inch diameter monitoring well MW-38 installed. Seven test pits TP-1-96 through TP-7-96 excavated.	Wells were installed on the northeast corner of the property. Test pits were throughout the ADC Parcel.
Jun-96	AGRA	LPH Vacuum Recovery Pilot Test		LPH vacuum recovery pilot test	14-day test included SVE and groundwater/LPH pumping system.	125 gal of LPH and 28,228 gal of groundwater removed from VRW-1 during test.
Aug-96	AGRA	Site		Monitoring wells	Gauged wells at the property.	LPH found in B-1, VRW-1, MW-27, MW-29, MW-30, MW-38, W-1, W-9, W-15.

Table 1 **Chronology of Historical On-Site Environmental Investigations and Remedial Actions**

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Feb-97	PTI Environmental Services (PTI)	Site		LPH recovery technical memorandum	Technical memorandum to summarize environmental investigations, LPH recovery activities, and geology.	PTI concluded that long-term, passive (LPH only) recovery may be the most effective method of LPH recovery.
Nov-97 Jan-98	Pacific Environmental Group, Inc. (PEG)	Kimberly-Clark Property		Boring, monitoring well	Direct push borings Probe-1 through Probe-15. 2-inch diameter HSA monitoring wells KC-1 and KC-2 inside the KC warehouse.	Groundwater samples were collected from temporary screens installed in each boring. LPH not identified in soil borings or monitoring wells. TPH-D and TPH-O were detected above MTCA Method A cleanup levels in borings advanced in the vicinity of repaired CSO line. Samples not collected in vicinity of former ASTs.
1998				Agreed Order DE98TC-P-N223		Required remedial investigation/focused feasibility study.
Jul-98	Exponent	Site		Remedial Investigation and Focused Feasibility Study	Report	Exponent recommended the installation of LPH recovery trenches and capping the property.
Nov-98	Kleinfelder, Inc. (Kleinfelder)	ADC Parcel		Survey, geotechnical evaluation	Initial survey. Asbestos survey prior to demolition.	Demolition activities included four buildings on the ADC parcel. Demolition completed in January 1999.

Table 1 **Chronology of Historical On-Site Environmental Investigations and Remedial Actions**

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Dec-98	Kleinfelder	The Property	THO TO TO TO TO TO TO TO TO TO TO TO TO TO	Interim remedial action	Removed TPH-impacted soil, graded the property, removed purge water.	162 tons of contaminated shallow soil and vegetation removed from within the ADC firewall area during demolition and transported to TPS Technologies facility for disposal. 3.5 tons of class 3 petroleum-contaminated soil taken to CRS Associated. Marine Services, Inc. removed 110 gal of purge water.
1999	Kleinfelder	The Property		Interim remedial action (continued)	Monitoring well abandonment. Interceptor trench construction along the western and northern property boundaries. Low-permeability cap construction over the property. Recovery wells LPH-1 through LPH-9 installed in interceptor trench. Storm collection system that connects to the City of Everett sewer system was installed.	Monitoring wells abandoned (MW-6, MW-8, MW-9, MW-12, MW-13, MW-15, MW-16, MW-17, MW-38, WP-1, B-1, B-2, W-4, W-8, W-11, W-12, W-14, AD-11, AD-12, AD-13, AD-15, AD-19, W-10, W-15, and MW-40). Completed site grading, installation of two layers of geotextile fabric, asphalt-treated base material, and paving fabric and asphalt cap.
Oct-99	Kleinfelder	The Property		Monitoring wells installation	Monitoring wells W-10R, W-15R, and MW-40R.	Wells installed to replace wells W-10, W-15, and MW-40.
Dec-99	Dames and Moore	To the south and southeast from the Property		Geotechnical drilling and piezometer installation	DM-6, DM-7, and DM-8 were sampled for environmental samples.	Work associated with California Street Overcrossing (CSTO) Project.

Table 1 Chronology of Historical On-Site Environmental Investigations and Remedial Actions

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Sep-00	URS Corporation (URS)	To the south, east, and southeast from the Property		Borings	Phase II investigation for the CSTO Project. Push- probe borings UG-1 through UG-12.	Groundwater samples collected from temporary screens installed in UG-2 and UG-8. Estimated 7,600 cubic yards of petroleum-contaminated soil present along the overcrossing alignment.
Jul-01	URS	Johnston Petroleum parcel		Borings	Phase II investigation for Johnson Petroleum parcel. Push-probe borings JP-1 through JP-7.	Soil samples collected. Groundwater samples collected from JP-1, JP-4, and JP-7. No significant contamination found.
Feb-02	Environmental Resolutions, Inc. (ERI)	Site and vicinity		Monitoring wells decommissioning, monitoring well reinstallment	Abandonment of monitoring wells (MW-22, MW-23, MW-24, MW-35, and MW-37) and piezometer DM-6 due to proximity to the CSTO Project. Re-installed well W-2.	No soil samples taken during W-2 installation.
2002	Reid Middleton	CSTO		Memorandum to Ecology	Southeast corner of the asphalt cap over the ExxonMobil Parcel removed. Steel piles for concrete foundation were installed.	No information regarding contaminant soil excavation and removal was found.
2002- 2007	Kleinfelder, ERI, AMEC Earth & Environmental, Inc. (AMEC)	Site		Groundwater monitoring	Monthly LPH gauging and quarterly groundwater monitoring.	LPH greater than 0.02 ft thick is bailed manually and oleophilic socks are replaced.
Jul-02	ERI	West of the ExxonMobil Parcel		Well decommissioning	Monitoring wells MW-20, MW-21, and one unidentified well were decommissioned.	The record contradicts the records that indicate that MW-21 was decommissioned during the December 1993 recovery trench installation.

Table 1 **Chronology of Historical On-Site Environmental Investigations and Remedial Actions**

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
2007- present	AMEC	Site		Groundwater monitoring	AMEC request to change to semiannual groundwater monitoring.	Request was accepted by Ecology.
2008	AMEC	West of the property		Monitoring wells	Off-property monitoring wells MW-A1 and MW-2A installed on the west side of Federal Avenue.	Monitoring wells MW-A1 and MW-2A are incorporated into existing groundwater monitoring network.
Feb-08	AMEC	Site		Tidal study	Tidal response was measured in W-3, W-6, MW-11, MW-28, and MW-40R	Minimal response in each well, except MW-11.
Jun-08	AMEC	Site		Well Head elevations survey	True North Land Surveying of Seattle, Washington, surveyed recovery and monitoring wells located on-site	Recovery wells LPH-1 through LPH-9 and monitoring wells W-1, W-2, W-3, W-6, W-10R, MW-10, MW-11, W-15R, W-17, RW-2, MW-19, MW-27, MW-28, MW-29, MW-30, MW-40R, and MW-A1 and MW-A2.
Jun-08	Floyd Snider	North-Northeast of the property		Excavation and disposal of PCS and dewatering the excavation	Soil associated with Puget Sound Outfall 5 (PSO 5) Overflow Structure project was excavated and disposed off. In addition, dewatering also occurred during excavation.	Soil was field-screen. Soil that exhibited obvious signs of contamination was disposed off as Class II soil without sampling. Soil that appeared to be "clean", was sampled and then disposed as Class II soil. Water from the excavation was sampled for the City sewer discharge requirements.
2009	AMEC	Site		Proposed 2009 Agreed Order		Data Gap Investigations, followed by Focused Feasibility Study, and CAP.

Table 1 Chronology of Historical On-Site Environmental Investigations and Remedial Actions

Abbreviations

ADC = American Distributing Company

AST = Above Ground Storage Tank

bgs = below ground surface

CAP = Cleanup Action Plan

CSO = Combined Sewer Outflow

CSTO = California Street Overcrossing

Ecology = Washington State Department of Ecology

ft = feet

gal = gallons

gpm = gallons per minute

GPR = Ground Penetrating Radar

HSA = Hollow Stem Auger

KC = Kimberly-Clark

LPH = Liquid Petroleum Hydrocarbons

MTCA = Model Toxics Control Act

PCS = petroleum-contaminated soil

SVE = Soil Vapor Extraction

TPH = Total Petroleum Hydrocarbons

TPH-D = Total Petroleum Hydrocarbons-Diesel Range Organics

TPH-G = Total Petroleum Hydrocarbons-Gasoline Range Organics

TPH-O = Total Petroleum Hydrocarbons-Residual Range Organics

Table 2 Analytical Results for Total Petroleum Hydrocarbons in Soil

	Depth		Oil and Grease	TPH	TPH-Diesel	TPH-Oil
Sample ID	(feet)	Date Sampled	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
MTCA Method A Cle	eanup Level	Unrestricted/Residential	2,000	2,000	2,000	2,000
AD-1	0.5 to 1	1/15/1990		780		
AD-1	3	1/15/1990		3,900		
AD-1	3	1/15/1990		2,380 ¹		
AD-2	0.5 to 1	1/15/1990		250		
AD-2	2.5 to 3	1/15/1990		280		
AD-3	0.5 to 1	1/15/1990		31		
AD-3	1.5 to 2	1/15/1990		9		
AD-4	0.5 to 1	1/15/1990		720		
AD-5	0.5 to 1	1/15/1990		8,800		
AD-5	1.5 to 2	1/15/1990		1,900		
AD-5	2.5 to 3	1/15/1990		2,300		
AD-5	2.5 to 3	1/15/1990		2,100 ¹		
AD-6	0.5 to 1	1/15/1990		2,700		
AD-7	0.5 to 1	1/15/1990		5,800		
AD-8	0.5 to 1	1/15/1990		1,600		
AD-8	2.5 to 3	1/15/1990		2,700		
AD-8	2.5 to 3	1/15/1990		1,530 ¹		
AD-8	4.5 to 5	1/15/1990		6,200		
AD-8	4.5 to 5	1/15/1990		7,080 ¹		
AD-9	0.5 to 1	1/15/1990		630		
AD-9	1.5 to 2	1/15/1990		4,400		
AD-10	0.5 to 1	1/15/1990		33,000		
AD-11	0.5 to 1	1/15/1990		8,000		
AD-11	1 to 1.5	1/15/1990		12,000		
AD-12	0.5 to 1	1/15/1990		230		
AD-12	2.5 to 3	1/15/1990		14,000		
AD-12	2.5 to 3	1/15/1990		9900 ¹		
AD-12	3 to 3.5	1/15/1990		16,000		
AD-12	3 to 3.5	1/15/1990		12,800 ¹		
AD-13	0.5 to 1	1/15/1990		4,400		
AD-13	2 to 2.5	1/15/1990		27,000		
AD-13	2 to 2.5	1/15/1990		24,900 ¹		
AD-13	0.5 to 1	1/15/1990		13,000		
AD-14	2 to 2.5	1/15/1990		17,000		
AD-14	2 to 2.5	1/15/1990		9,500 ¹		
AD-14 AD-15	0.5 to 1	1/15/1990		61		
			+	7 1		
AD-15	0.5 to 1	1/15/1990				
AD-15	2.5 to 3	1/15/1990		2,400		
AD-15	2.5 to 3	1/15/1990		3,340 ¹		
AD-16	0.5 to 1	1/15/1990		2,200		
AD-16	0.5 to 1	1/15/1990		1,370 ¹		
AD-17	0.5 to 1	1/15/1990		8,500		
AD-17	0.5 to 1	1/15/1990		8,100 ¹		
AD-18	0.5 to 1	1/15/1990		24		-
AD-18	4 to 4.5	1/15/1990		520		
AD-19	0.5 to 1	1/15/1990		23,000		

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 Table 2
 Analytical Results for Total Petroleum Hydrocarbons in Soil

	Depth		Oil and Grease	TPH	TPH-Diesel	TPH-Oil
Sample ID	(feet)	Date Sampled	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
		Unrestricted/Residential	2,000	2,000	2,000	2,000
AD-19	1 to 1.5	1/15/1990		100,000		
B-1_Soil Grab	0 to 1.5	10/9/1990		2,117		
B-1_Soil Grab	1.5 to 2	10/9/1990		446		
B-1_Soil Grab	0 to 1.5	10/9/1990		90.6		
B-3_Soil Grab	0 to 1.5	10/9/1990		213		
B-3_Soil Grab	1.5 to 3	10/9/1990		831		
B-4_Soil Grab	0 to 1.5	10/9/1990		65.2		
B-5 Soil Grab	0 to 1.5	10/9/1990		701		
B-6 Soil Grab	0 to 1.0	10/9/1990		428		
B-7_Soil Grab	0 to 1.5	10/9/1990		434		
B-8_Soil Grab	0 to 1.5	10/9/1990		126		
B-8_Soil Grab	1.5 to 3	10/9/1990		174		
B-9_Soil Grab	0 to 1.5	10/9/1990		469		
B-9_Soil Grab	1.5 to 3	10/9/1990		643		
B-10_Soil Grab	0 to 1.5	10/9/1990		206		
B-10_Soil Grab	1.5 to 2	10/9/1990		231		
B-10_Soil Grab	0 to 1.5	10/9/1990		323		
B-11_Soil Grab	1.5 to 3	10/9/1990		406		
B-11_Soil Grab	0 to 1.5	10/9/1990		191		
B-12_Soil Grab	1.5 to 3	10/9/1990		11,775		
B-12_Soil Grab	0 to 1.5	10/9/1990		277		
B-13_Soil Grab	1.5 to 3	10/9/1990		15.9		
B-13_Soil Grab	0 to 1.5	10/9/1990		212		
B-14_Soil Grab	1.5 to 3	10/9/1990		128		
B-14_Soil Grab	0 to 1.5	10/9/1990		132		
B-15_Soil Grab	1.5 to 3	10/9/1990		17		
B-16_Soil Grab	0 to 1.5	10/9/1990		1,898		
B-16_Soil Grab	1.5 to 2.5	10/9/1990		9,718		
B-16_Soil Grab	0 to 1.5	10/9/1990	+	1,513		
B-17_Soil Grab	1.5 to 3	10/9/1990				
B-17_Soil Grab	0 to 1.5	10/9/1990		2,139 46		
B-18_Soil Grab	1.5 to 3	10/9/1990		738		
_			+			
B-19_Soil Grab B-19 Soil Grab	0 to 1.5 1.5 to 3	10/9/1990 10/9/1990		626 10,577		
B-20 Soil Grab	0 to 1.5	10/9/1990		117		
B-20_Soil Grab	1.5 to 3	10/9/1990		46.9		
B-20_Soil Grab						
B-21_Soil Grab	0 to 1.5 1.5 to 3	10/9/1990		2,116		
		10/9/1990		1,974		
B-21-91	5	6/24/1991		12,000		
B-21-91	5	6/24/1991		4,700 ¹		
B-21-91	6	6/24/1991		27		
B-21-91	6	6/24/1991		10 U		
B-22_Soil Grab	0 to 1.5	10/9/1990		360		
B-22_Soil Grab	1.5 to 3	10/9/1990		1,800		
B-23_Soil Grab	0 to 1.5	10/9/1990		1,691		
B-23_Soil Grab	1.5 to 3	10/9/1990		6,421		
B-24_Soil Grab	0 to 1.5	10/9/1990		560		

 Table 2
 Analytical Results for Total Petroleum Hydrocarbons in Soil

	Depth		Oil and Grease	TPH	TPH-Diesel	
Sample ID	(feet)	Date Sampled	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
MTCA Method A Clea	anup Level	Unrestricted/Residential	2,000	2,000	2,000	2,000
B-25_Soil Grab	0 to 1.5	10/9/1990		76		
B-25_Soil Grab	1.5 to 3	10/9/1990		29.8		
B-34/S-2	4 to 5.5	12/6/1993			500	
B-34/S-5	12.5 to 14	12/6/1993			4,800	
CSO Log yard backfill		6/27/1996			3,910	586
CSO Log yard N-2		7/1/1996			58.9	221
CSO Log yard pipe		6/27/1996			45.2	25 U
CSO Log yard W-1		7/1/1996			27	67.3
DM-6		12/6/1999			44.3	25 U
DM-7		12/8/1999			482	225
DM-8		12/1/1999			44.4	102
GP-1	10	3/20/1996			276	
GP-2	11.5	3/20/1996			322	
GP-3	6	3/20/1996			1,370	
GP-4	6	3/20/1996			297	
GP-5	3	3/20/1996			30.4	
GP-5	8.5	3/20/1996			703.2	
GP-7	5.5	3/20/1996		-	3,800	4,300
GP-8	7	3/20/1996		-	77	160
GP-8	8	3/20/1996		-	6.55	
GP-9	8	3/20/1996			12,000	2,900
GP-10	7 to 7	3/20/1996			383	
GP-11	6.5	3/20/1996		-	92	60
GP-12	11	3/20/1996			382	
GP-12	12.5	3/20/1996			414	
GP-13	7	3/20/1996		-	2 U	
GP-13	10	3/20/1996			15	41
JP-1	4 to 8	6/21/2001		-	73.8	100
JP-2	0 to 3	6/21/2001			134	341
JP-2	3 to 6	6/21/2001			379	942
JP-3	4 to 6	6/21/2001			10 U	25 U
JP-4	3 to 6	6/21/2001			180	58.2
JP-5	3 to 6	6/21/2001			210	375
JP-6	6 to 9	6/21/2001			26.6	69.3
JP-7	1 to 2	6/21/2001			264	923
MW-6	2.5	3/9/1988	180	80		
MW-7	2.5	3/9/1988	605	605		
MW-8	2.5	3/9/1988	1,680	1,580		
MW-9	2.5	3/9/1988	33,500	33,500		
MW-10	2.5	3/9/1988	1,380	1,260		
MW-11	2.5	3/9/1988	10,100	9,480		
MW-12	2.5	3/9/1988	5 U	5 U		
MW-15	2.5	3/9/1988	3,430	3,030		
MW-16	2.5	3/9/1988	5 U	5 U		
MW-17	2.5	3/9/1988	174	124		
MW-18	2.5	3/9/1988	777	777		
MW-19	2 to 3.5	3/11/1991		53		

Table 2 Analytical Results for Total Petroleum Hydrocarbons in Soil

	Depth		Oil and Grease	TPH	TPH-Diesel	TPH-Oil
Sample ID	(feet)	Date Sampled	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
-	` '	Unrestricted/Residential	2,000	2,000	2,000	2,000
MW-19	2 to 3.5	3/11/1991	,	10 U ¹	,	,
MW-19	3.5 to 5	3/11/1991		14		
MW-19	3.5 to 5	3/11/1991		10 U ¹		
MW-20	2 to 3.5	3/11/1991		18		
				10 U ¹		
MW-20	2 to 3.5 3.5 to 5	3/11/1991		20		
MW-20	+	3/11/1991		10 U ¹	-	
MW-20	3.5 to 5	3/11/1991				
MW-21	1.5 to 3	3/11/1991		110		
MW-21	1.5 to 3	3/11/1991		10 U ¹		
MW-21	3.5 to 5	3/11/1991		12,000		
MW-21	3.5 to 5	3/11/1991		4,700 ¹		
MW-22	2.5 to 4	3/11/1991		41,000		
MW-22	2.5 to 4	3/11/1991		7,300 ¹		
MW-22	4 to 5.5	3/11/1991		24,000		
MW-22	4 to 5.5	3/11/1991		430 ¹		
MW-23	1 to 2.5	3/11/1991		300		
MW-23	1 to 2.5	3/11/1991		10 U ¹		
MW-24	2.5 to 4	3/11/1991		260		
MW-24	2.5 to 4	3/11/1991		10 U ¹		
MW-24	4 to 5.5	3/11/1991		1,300		
MW-24	4 to 5.5	3/11/1991		10 U ¹		
MW-27	2	6/24/1991		4,700		
MW-27	2	6/24/1991		900		
MW-27	3	6/24/1991		61		
MW-27	3	6/24/1991		10 U ¹		
MW-28	2	6/24/1991		93		
MW-28	2	6/24/1991		10 U ¹		
MW-28	3	6/24/1991		51		
MW-28	3	6/24/1991		10 U ¹		
MW-29	1	6/24/1991		590		
MW-29	1	6/24/1991		220 ¹		
MW-29	2	6/24/1991		730,000		
MW-29	2	6/24/1991		160,000		
MW-30	2	6/24/1991		4,900		
MW-30	2	6/24/1991		820		
MW-30	3	6/24/1991		7,700		
MW-30	3	6/24/1991		3,000		
MW-31	12.5 to 14				49	
MW-31	2.5 to 4	12/6/1993			13	
MW-32	12.5 to 14				17	
MW-32	7.5 to 9	12/6/1993			10 U	
MW-33	12.5 to 14				11	
MW-33	5 to 6.5	12/6/1993			1,100	
MW-35	12.5 to 14	12/6/1993			16	
MW-35	2.5 to 4	12/6/1993			10 U	
MW-36	12.5 to 14	12/6/1993			22	

Table 2 Analytical Results for Total Petroleum Hydrocarbons in Soil

	Depth		Oil and Grease	TPH	TPH-Diesel	TPH-Oil
Sample ID	(feet)	Date Sampled	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
MTCA Method A Clea	anup Level	Unrestricted/Residential	2,000	2,000	2,000	2,000
MW-36	2.5 to 4	12/6/1993			700	
MW-37	2.5 to 4	12/6/1993			3,500	
MW-37	12.5 to 14	12/6/1993			380	
MW-A1	7.5 to 8	2/4/2008		-	74.1	79.5
MW-A1	8.5 to 9	2/4/2008		-	5,160	471 U
MW-A2	6 to 6.5	2/4/2008			33.3	290
MW-A2	7.5 to 8	2/4/2008			2,370	279
RW-1/MW-14	2.5	3/9/1988	1,730	1,730		
TP-2	3.5	12/6/1993			10 U	
TP-2	3.5	12/8/1993				
TP-3	3.5	12/6/1993			16	
TP-3	3.5	12/8/1993				
TP-5	3.5	12/6/1993			10 U	
TP-5	3.5	12/8/1993		-		
UG-1	5 to 7	9/25/2000		-	27,100	52,300
UG-2	10 to 12	9/25/2000			364	353
UG-3	7.5 to 9.5	9/25/2000			190	79.5
UG-4	5 to 7	9/25/2000			10 U	25 U
UG-5	5 to 7	9/25/2000			10 U	25 U
UG-6	5 to 7	9/26/2000			10 U	25 U
UG-7	2.5 to 4.5	9/26/2000			402	1,860
UG-8	5 to 7	9/26/2000			5,180	730
UG-9	2.5 to 4.5	9/26/2000			8,560	327
UG-9	10 to 12	9/26/2000			2,170	320
UG-10	5 to 7	9/26/2000			10 U	25 U
UG-11	5 to 7	9/26/2000			153	176
UG-12	5 to 7	9/26/2000			10 U	25 U
W-1	3	2/23/1990		13,000		
W-2	3	2/23/1990		17,000		
W-3	3	2/23/1990		28		
W-4	3	2/23/1990		4,600		
W-5	3	2/23/1990		2,300		
W-6	3	2/23/1990		1,200		
W-7	3	2/23/1990		910		

1. Duplicate result analyzed using EPA Method 8015 Modified. The primary results were analyzed using EPA Method 418.1.

mg/kg = milligrams per kilogram

MTCA = Model Toxics Control Act

TPH = Total Petroleum Hydrocarbon

U = Analyte not detected above the reporting limit indicated

-- = Not analyzed

Bold and cell in orange = Result greater than MTCA A CUL criteria

Table 3 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Soil

							Total	
			TPH-Gas	Benzene	Ethylbenzene	Toluene	Xylene	Lead
Sample ID	Depth	Date Sampled	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
		MTCA Method A						
	Industria	al Cleanup Level						1,000
MTC	A Method A	Cleanup Level,						
	Unrestri	cted/Residential	100/30 ¹	0.03	6	7	9	250
AD-1	3	1/15/1990		0.4 U	0.8 U	8 U	2 U	22
AD-5	2.5 to 3	1/15/1990		0.4 U	0.8 U	8 U	2 U	76
AD-8	2.5 to 3	1/15/1990		0.4 U	0.8 U	8 U	2 U	10
AD-8	4.5 to 5	1/15/1990		0.4 U	0.8 U	8 U	2 U	2.8
AD-12	2.5 to 3	1/15/1990		0.4 U	1.5	8 U	2 U	
AD-12	3 to 3.5	1/15/1990		0.4 U	2.5	8 U	2 U	44
AD-13	2 to 2.5	1/15/1990		0.4 U	10	8 U	2 U	180
AD-14	2 to 2.5	1/15/1990		5.1	15	8 U	2 U	58
AD-15	0.5 to 1	1/15/1990		0.4 U	0.8 U	8 U	2 U	97
AD-15	2.5 to 3	1/15/1990		0.4 U	0.25	8 U	0.61	14
AD-16	0.5 to 1	1/15/1990		0.4 U	0.8 U	8 U	2 U	7.9
AD-17	0.5 to 1	1/15/1990		0.4 U	0.8 U	8 U	2 U	69
B-21-91	5	6/24/1991		0.035	2	0.53	8.8	30
B-21-91	6	6/24/1991		0.05 U	0.05 U	0.05 U	0.05 U	3.7
B-34/S-2	4 to 5.5	12/6/1993	670	0.63	2.6	0.05 U	0.9	15 U
B-34/S-5	12.5 to 14	12/6/1993	2,600	6.6	14	0.05 U	3.8	860
DM-6		12/6/1999	10.5					
DM-7		12/8/1999	20.1					
DM-8		12/1/1999	5 U					
GP-7	5.5	3/20/1996	150	0.05 U	0.05 U	0.05 U	0.1 U	
GP-8	7	3/20/1996	3.9	0.05 U	0.05 U	0.05 U	0.1 U	
GP-9	8	3/20/1996	880	0.05 U	0.05 U	0.18	0.6	
GP-11	6.5	3/20/1996	160	0.05 U	0.05 U	0.05 U	0.1 U	
GP-13	10	3/20/1996	1 U	0.05 U	0.05 U	0.05 U	0.1 U	
JP-1	4 to 8	6/21/2001	5 U	0.05 U	0.05 U	0.05 U	0.1 U	
JP-2	0 to 3	6/21/2001	5 U	0.05 U	0.05 U	0.05 U	0.1 U	
JP-2	3 to 6	6/21/2001	5 U	0.05 U	0.05 U	0.05 U	0.1 U	
JP-3	4 to 6	6/21/2001	5 U	0.05 U	0.05 U	0.05 U	0.1 U	
JP-4	3 to 6	6/21/2001	6.04	0.05 U	0.05 U	0.05 U	0.1 U	
JP-5	3 to 6	6/21/2001	5 U	0.05 U	0.05 U	0.05 U	0.1 U	
JP-6	6 to 9	6/21/2001	5 U	0.05 U	0.05 U	0.05 U	0.1 U	
JP-7	1 to 2	6/21/2001	26.5	0.05 U	0.05 U	0.05 U	0.1 U	
MW-6	2.5	3/9/1988		0.015 U	1.001	0.01 U	2.95	
MW-7	2.5	3/9/1988		0.015 U	0.087 U	0.01 U	0.064 U	
MW-8	2.5	3/9/1988		0.015 U	0.01 U	0.01 U	0.015 U	
MW-9	2.5	3/9/1988		0.015 U	0.432	0.01 U	1.207	
MW-10	2.5	3/9/1988		0.015 U	0.122	0.02	1.399	
MW-11	2.5	3/9/1988		0.362	1.994	1.31	10.39	
MW-12	2.5	3/9/1988		0.015 U	0.01 U	0.01 U	0.015 U	
MW-15	2.5	3/9/1988		0.158 U	0.781	0.66	11.018	
MW-16	2.5	3/9/1988		0.015 U	0.01 U	0.01 U	0.015 U	
MW-17	2.5	3/9/1988		0.015 U	0.01 U	0.01 U	0.015 U	
MW-18	2.5	3/9/1988		0.048	2.685	0.028	10.215	

Table 3 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Soil

	1	1			1		T-1-1	
			TD 0				Total	
Commis ID	Donath	Data Camulad	TPH-Gas	Benzene	Ethylbenzene	Toluene	Xylene	Lead
Sample ID	Depth	Date Sampled	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
		MTCA Method A						
	Industria	al Cleanup Level						1,000
MTC	A Method A	A Cleanup Level,						
	Unrestri	cted/Residential	100/30 ¹	0.03	6	7	9	250
MW-19	2 to 3.5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-19	3.5 to 5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-20	2 to 3.5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-20	3.5 to 5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-21	1.5 to 3	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-21	3.5 to 5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-22	2.5 to 4	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-22	4 to 5.5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-23	1 to 2.5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-24	2.5 to 4	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-24	4 to 5.5	3/11/1991		0.05 U	0.1 U	0.1 U	0.1 U	
MW-27	2 to 2	6/24/1991		0.05 U	0.57	0.05 U	0.64	310
MW-27	3 to 3	6/24/1991		0.05 U	0.05 U	0.05 U	0.05 U	10
MW-28	2 to 2	6/24/1991		0.05 U	0.05 U	0.05 U	0.05 U	15
MW-28	3 to 3	6/24/1991		0.05 U	0.66	0.05 U	1.9	11
MW-29	1 to 1	6/24/1991		0.05 U	0.84	0.55	3.5	29
MW-29	2 to 2	6/24/1991		0.18	2.9	5.3	7.9	89
MW-30	2 to 2	6/24/1991		0.05 U	0.74	0.77	2.6	37
MW-30	3 to 3	6/24/1991		0.5	0.24	0.13	1	570
MW-31	12.5 to 14	12/6/1993	31	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-31	2.5 to 4	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	44
MW-32	12.5 to 14	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	200
MW-32	7.5 to 9	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-33	12.5 to 14	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-33	5 to 6.5	12/6/1993	49	0.05 U	0.05 U	0.05 U	0.1 U	54
MW-35	12.5 to 14	12/6/1993	1.3	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-35	2.5 to 4	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-36	12.5 to 14	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	15 U
MW-36	2.5 to 4	12/6/1993	30	0.05 U	0.05 U	0.05 U	0.1 U	26
MW-37	12.5 to 14	12/6/1993	170	0.18	0.19	0.05 U	0.26	15 U
MW-37	2.5 to 4	12/6/1993	180	0.77	1.4	0.05 U	2.3	55
MW-A1	7.5 to 8	2/4/2008	50 U	0.0322 U	0.0322 U	0.0376	0.0965 U	
MW-A1	8.5 to 9	2/4/2008	168	0.0319 U	0.0319 U	0.0319 U	0.0956 U	
MW-A2	6 to 6.5	2/4/2008	10.2 U	0.102 U	0.102 U	0.102 U	0.306 U	
MW-A2	7.5 to 8	2/4/2008	203	0.0355	0.04	0.0313 U	0.6	
RW-1/MW-14	2.5	3/9/1988		0.575	2.348	1.301	12.975	
TP-2	3.5	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	10 U
TP-3	3.5	12/6/1993	3.4	0.05 U	0.05 U	0.05 U	0.1 U	10 U
TP-5	3.5	12/6/1993	1 U	0.05 U	0.05 U	0.05 U	0.1 U	10 U
UG-1	5 to 7	9/25/2000	173					
UG-2	10 to 12	9/25/2000	55.3					
UG-3	7.5 to 9.5	9/25/2000	108					
UG-4	5 to 7	9/25/2000	5 U					

Table 3 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Soil

Sample ID	Depth	Date Sampled	TPH-Gas mg/kg	Benzene mg/kg	Ethylbenzene mg/kg	Toluene mg/kg	Total Xylene mg/kg	Lead mg/kg
		MTCA Method A al Cleanup Level						1,000
МТС		Cleanup Level, cted/Residential	100/30 ¹	0.03	6	7	9	250
UG-5	5 to 7	9/25/2000	5 U					
UG-6	5 to 7	9/26/2000	5 U					
UG-7	2.5 to 4.5	9/26/2000	5 U					
UG-8	5 to 7	9/26/2000	3410					
UG-9	2.5 to 4.5	9/26/2000	6050	2.5 U	34 U	5.5 U	30.5 U	
UG-9	10 to 12	9/26/2000	630					
UG-10	5 to 7	9/26/2000	5 U					
UG-11	5 to 7	9/26/2000	5 U					
UG-12	5 to 7	9/26/2000	5 U					

1. Cleanup level for TPH-Gas is 100 mg/kg when benzene is absent, and 30 mg/kg in presence of benzene.

mg/kg = milligrams per kilogram

MTCA = Model Toxics Control Act

U = Analyte not detected above the reporting limit indicated

-- = Not analyzed

Bold TPH-Gas = Result greater than 30 mg/kg but presence of benzene is unknown due to high detection limit

Bold and cell in orange = Result greater than MTCA Method A Unrestricted Land Use

cell in yellow = analyte not detected, but detection limit is greater than MTCA Unrestricted Land Use

Bold and cell in green = Result greater than MTCA Unrestricted Land Use but less than MTCA Method A Industrial Cleanup Level

Table 4 Analytical Results for Polycyclic Aromatic Hydrocarbons in Soil

Sample ID	Depth	Date Sampled	Acenaphthene (mg/kg)	Acenaphthylene (mg/kg)	Anthracene (mg/kg)	Benzo(a) anthracene* (mg/kg)	Benzo(a) pyrene* (mg/kg)	Benzo(b) fluoranthene* (mg/kg)	Benzo(g,h,i) perylene (mg/kg)	Benzo(k) fluoranthene* (mg/kg)	Chrysene* (mg/kg)	Dibenz(a,h) anthracene* (mg/kg)	Indeno(1,2,3-cd) pyrene* (mg/kg)	Naphthalene (mg/kg)	Phenanthrene (mg/kg)	Pyrene (mg/kg)	Total cPAH ¹ TEQ- Adjusted (mg/kg)
		Industrial CUL					2										2
MTCA A U	Inrestricted/Re						0.1										0.1
		rcinogen CUL					0.14										
		rcinogen CUL			24,000									1,600		2,400	
B-34/S-2	4 to 5.5	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	1.1	0.24	0.1 U	0.0755 U
B-34/S-5	12.5 to 14	12/6/1993	2 U	2 U	4.9	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	4.9	2 U	1.51 U
GP-7	5.5	3/20/1996	0.15 U	0.993	0.261	4.25	0.024	0.468	0.744	0.132	3.43	0.01 U	1.43	0.15 U	0.844	1.3	0.6868
GP-8	7	3/20/1996	0.32	0.168	0.147	0.717	0.166	0.141	0.0728	0.0435	25.2	0.01 U	0.0967	0.15 U	0.669	0.02 U	0.51832
GP-9	8	3/20/1996	1.27	2.98	0.15 U	0.01 U	0.105	0.173	0.412	0.111	12.4	0.409	0.0858	0.15 U	1.3	1.35	0.30738
GP-11	6.5	3/20/1996	0.15 U	0.15 U	0.15 U	0.0859	0.0106	0.053	0.165	0.01 U	0.192	0.0644	0.0483	0.15 U	0.276	0.202	0.03818
GP-13	10	3/20/1996	0.15 U	0.15 U	0.15 U	0.0479	0.0361	0.0173	0.01 U	0.0365	0.0597	0.0312	0.0157	0.15 U	0.15 U	0.0482	0.051557
MW-31	2.5 to 4	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.12	0.14	0.0755 U
MW-31	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-32	7.5 to 9	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-32	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1	0.34	0.26	0.33	0.18	0.16	0.16	0.1 U	0.17	0.1 U	0.68	0.98	0.3666
MW-33	5 to 6.5	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-33	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-35	2.5 to 4	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-35	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-36	2.5 to 4	12/6/1993	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	0.31	0.31	1.51 U
MW-36	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
MW-37	2.5 to 4	12/6/1993	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.3775 U
MW-37	12.5 to 14	12/6/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
TP-2	3.5	12/8/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
TP-3	3.5	12/8/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U
TP-5	3.5	12/8/1993	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.0755 U

1. Total cPAH concentration expressed as TEQ-adjusted total cPAH concentration adjusted using Toxicity Equivalency Factors for maximum required cPAHs (Table 708-2 under WAC 173-340-708). cPAH = Carcinogenic Polycyclic Aromatic Hydrocarbon

CUL = cleanup level

mg/kg = milligrams per kilogram

MTCA = Model Toxics Control Act

TEQ = toxicity-equivalent quotient

U = Sample was analyzed but not detected above the reporting limit indicated

-- = Not analyzed

Bold and cell in blue = Benzo(a)pyrene result greater than MTCA Nethod A CUL Residential and MTCA Method B CUL Carcinogen but less than MTCA Method A CUL Industrial

Bold and cell in yellow = Analyte not detected, but detection limit is greater than MTCA Method A CUL Unrestricted and/or Industrial land use

Bold and cell in orange = Result for TEQ-adjusted total cPAHs greater than MTCA Method A residential/unrestricted CUL.

^{* =} Compounds is a cPAH compound included in calculations of TEQ-adjusted total cPAH concentration. Values for individual cPAH constituents are actual analytical results.

Table 5 Analytical Results for Total Petroleum Hydrocarbons in Groundwater

		T			1
		0.1 1 0	TPH	TDU D'	TDU O'
Wall ID	Data Camania d	Oil and Grease	(undifferentiated)	TPH-Diesel	TPH-Oil
Well ID	Date Sampled	(µg/L)	(µg/L)	(µg/L)	(µg/L)
	MTCA Method A	500	500	500	500
	3/27/1991		3,800		
D.O II	6/24/1991		500 U		
B-2_well	12/26/1991			500 U	
	12/9/1993			780	
D.C. well	11/21/1995		4.000 11	4,400	3,900
B-5_well	3/27/1991 3/17/1988		1,000 U 86.2		
		86,200			
	3/27/1991		27,000		
	6/24/1991		500 U		
MW-10	9/26/1991			2,600	
10100-10	12/26/1991			9,000	
	12/9/1993			10,000	
	11/22/1995			4,200 19,000	6,800
	12/8/2000				18,000 J
	2/28/2002 3/17/1988	49 400	 41.4	5,700	2,300 J
		48,400			
	3/27/1991 6/24/1991		15,000 7,200		
	9/26/1991		1,200	3,900	
	12/9/1993			10,000	
	11/22/1995			2,400	1,200
	12/8/2000			230 J	400 U
	3/19/2001			540	310 J
	5/16/2001			760	590
	8/21/2001			670	820
	2/28/2002			460	520
	8/27/2002			3,700	1,300 J
	11/26/2002			480	520
	2/6/2003			460	460 J
	5/15/2003			470	440 J
MW-11	8/20/2003			610	610
	11/14/2003			360	330 J
	2/26/2004			430	410 J
	5/27/2004			270 J	310 J
	11/18/2004			500 J	480 U
	2/24/2005			240	430 J
	5/23/2005			470	380 J
	8/30/2005			79 U	98 U
	11/29/2005			160 J	200 J
	2/23/2006			77 U	96 U
	8/24/2006			93.9 U	93.9 U
	11/27/2006			108	94.3 U
	2/12/2007			93.9 U	141
	8/29/2007			94.3 U	109
	2/11/2008			19,200	1,280
	2/12/2009			94.3 U	94.3 U

Table 5 **Analytical Results for Total Petroleum Hydrocarbons in Groundwater**

Well ID	Date Sampled	Oil and Grease (µg/L)	TPH (undifferentiated) (µg/L)	TPH-Diesel (µg/L)	TPH-Oil (µg/L)
	MTCA Method A	500	500	500	500
	3/17/1988	10,500	4		
	3/27/1991		5,200		
	6/24/1991		500 U		
MW-12	9/26/1991			4,100	
	12/26/1991			500 U	
	12/9/1993			550	
	11/22/1995			2,100	3,600
	3/17/1988	25,000	16.9		
	3/27/1991		8,200		
MW-13	6/24/1991		4,300		
10100-13	9/26/1991			400 U	
	12/9/1993			2,600	
	11/22/1995			6,700	3,100
	3/17/1988	9,500	9.5		
	3/27/1991		4,000		
	6/24/1991		4,000		
MW-15	9/26/1991			860	
	12/26/1991			790	
	12/9/1993			600	
	11/21/1995			1,700	1,700
	3/17/1988	2,700	2.7		
	3/27/1991		1,000 U		
	6/24/1991		500 U		
MW-16	9/26/1991			400 U	
	12/26/1991			910	
	12/9/1993			610	
	11/21/1995			770	1,200
	3/17/1988	3,800	3.8		
	3/27/1991		1,000 U		
N 40 A / 4 ==	6/24/1991		500 U		
MW-17	9/26/1991			460	
	12/26/1991			1,000	
	12/9/1993			320	
	11/21/1995	24.000	 18	490	970
	3/17/1988	31,000			
	3/27/1991 6/24/1991		43,000 15,000		
	9/26/1991		·		
MW-18	12/26/1991			5,300 11,000	
	12/9/1991			46,000	
	11/21/1995			16,000	4,400
	2/28/2002			2,500	950 U
	3/27/1991		1,000 U	2,500	950 0
	6/24/1991		500 U		
	9/26/1991		500 U 	400 U	
MW-19	12/26/1991			1,800	
	12/7/2000			830 J	1,000 U
	3/19/2001			1,600	800

Table 5 Analytical Results for Total Petroleum Hydrocarbons in Groundwater

Well ID	Date Sampled MTCA Method A 5/16/2001 8/21/2001 2/28/2002 8/27/2002 11/26/2002 2/6/2003	Oil and Grease (μg/L) 500 	(undifferentiated) (µg/L) 500 	TPH-Diesel (µg/L) 500 760 1,100	TPH-Oil (μg/L) 500 590
wen ib	MTCA Method A 5/16/2001 8/21/2001 2/28/2002 8/27/2002 11/26/2002	500 	500	500 760	500
	5/16/2001 8/21/2001 2/28/2002 8/27/2002 11/26/2002	 		760	
- - - - -	8/21/2001 2/28/2002 8/27/2002 11/26/2002				390
	2/28/2002 8/27/2002 11/26/2002				1,200
 - 	8/27/2002 11/26/2002			1,200	580
-	11/26/2002			680	410 J
				860	570
	フ/ト/フロロス			1,900	1,100 J
	5/15/2003			3,300	2,000
	8/20/2003			1,400 J	1,400 J
	11/14/2003			1,400 3	750
	2/26/2004			1,800 J	4,700 J
	5/27/2004			680	460 J
	8/30/2004			850	460 J
MW-19	11/18/2004			640	190 U
(continued)	2/24/2005			860	500
(continued)	5/23/2005			1,000	550 J
	8/30/2005			1,200	470 J
	11/29/2005			200 J	180 J
	2/12/2006			1,570	705
	2/23/2006			200 J	100 U
	8/24/2006			1,740	825
	11/27/2006			209	118
	8/29/2007			1,390	547
	2/11/2008			794	587
	8/28/2008			1,050	1,200
_	2/12/2009			993	303
	3/27/1991		1,000 U		
	6/24/1991		500 U		
_	9/26/1991			400 U	
	12/26/1991			520	
MW-20	12/7/2000			410 J	400 U
	3/19/2001			610	480 J
	5/17/2001			540	390 J
	2/28/2002			540	410 J
	3/27/1991		1,058,000		
MW-21	6/24/1991		63,000		
	2/28/2002			9,800	5,800
	3/27/1991		800,000		
MW-22	12/26/1991			26,000	
	3/27/1991		25,000		
MW-23	6/24/1991		500 U		
MW-24	3/27/1991		6,000		
	6/24/1991		16,000		
MW-27	9/26/1991			9,400	
	11/21/1995			4,700	4,400

Table 5 Analytical Results for Total Petroleum Hydrocarbons in Groundwater

	T	I	TDU		
		Oil and Grease	TPH (undifferentiated)	TPH-Diesel	TPH-Oil
Well ID	Date Sampled	(µg/L)	(undifferentiated) (µg/L)	(µg/L)	(µg/L)
Well ID	MTCA Method A	500	500	500	500
	6/24/1991		600		
	9/26/1991			400 U	
MW-28	12/26/1991			500 U	
10100 20	12/9/1993			2,600	
	11/21/1995			3,400	3,700
	6/24/1991		7,200		
	9/26/1991			1,300	
MW-30	12/26/1991			3,500	
	12/9/1993			2,200	
	12/9/1993			470	
MW-31	11/21/1995			470	750 U
	12/9/1993			490	730 0
MW-32	11/21/1995			400	750 U
	12/9/1993			5,500	730 0
MW-33	11/21/1995			790	750 U
	12/9/1993			900	730 0
	11/22/1995			330	1,100
MW-35	12/8/2000			160 J	400 U
	3/19/2001			190 J	200
	12/9/1993			790	200
MW-36	11/21/1995			710	750 U
					750 0
MW-37	12/9/1993 11/21/1995			13,000 1,600	2,400
	12/8/2000			11,000	6,400 J
	3/19/2001			20,000	14,000
	5/16/2001			18,000	14,000
	8/21/2001			15,000	8,100
	2/28/2002			13,000	6,500
	8/27/2002			6,600	2,700
	11/26/2002			5,900	3,600 J
	2/6/2003			9,100	5,300
	5/15/2003			14,000	7,200
	8/20/2003			16,000	6,300 J
	11/14/2003			5,300	2,300 J
	2/26/2004			13,000	4,600 J
MW-40R	5/27/2004			11,000	4,800 J
10100-4010	8/30/2004			15,000	5,000
	2/24/2005			4,200	1,900
	5/23/2005			15,000	4,200 J
	8/30/2005			23,000	6,600
	11/29/2005			2,100	790 J
	2/23/2006			2,000	540 U
	8/24/2006			6,550	2,090
	11/27/2006			3,750	968
	2/12/2007			3,970	1,060
	8/29/2007			5,150	520
	2/11/2008			2,840	1,080
	8/28/2008 2/12/2009			10,600 3,110	8,990 959
	2/12/2009			3,110	909

Table 5 **Analytical Results for Total Petroleum Hydrocarbons in Groundwater**

			ТРН		
Well ID	Date Sampled	Oil and Grease (µg/L)	(undifferentiated) (µg/L)	TPH-Diesel (µg/L)	TPH-Oil (µg/L)
	MTCA Method A	500	500	500	500
	3/17/1988	12,400	1.1		
	3/27/1991		1,000 U		
	6/24/1991		500 U		
MW-6	9/26/1991			400 U	
	12/26/1991			5,500	
	12/9/1993			670	
	11/21/1995			800	1,400
MW-7	3/17/1988	4,700	1.6		
	3/17/1988	132,000	11.5		
MW-8	6/24/1991		1,300		
IVIVV-0	12/9/1993			26,000	
	11/21/1995			3,300	3,100
	3/17/1988	7,600	1.5		
	3/27/1991		1,000 U		
	6/24/1991		500 U		
MW-9	9/26/1991			770	
	12/26/1991			4,800	
	12/9/1993			2,600	
	11/21/1995			3,300	3,300
	2/11/2008			2,060	488
MW-A1	8/28/2008			2,850	2,600
	2/12/2009			2,080	414
	2/11/2008			1,310	550
MW-A2	8/28/2008			1,790	1100
	2/12/2009			1840	339
	8/22/1989		19,000		
	3/27/1991		1,000 U		
RW-1/MW-14	6/24/1991		530		
	9/26/1991			5,100	
	12/26/1991			500 U	
RW-2	2/11/2002			2,500	950 U
UG-2	9/25/2000			95	49
UG-8	9/25/2000			66,500	7,360
VWPT-1	6/6/1995			2,600	1,300
W-15R	2/28/2002			300,000	20,000 U
	12/7/2000			53,000	26,000
W-17	3/19/2001			12,000	6,400
**	5/16/2001			43,000	19,000 J
	8/21/2001			31,000	9,800
W-2	3/2/1990		7,400		
	3/2/1990		530 U		
	12/7/2000			990	350 J
	3/19/2001			900	370 J
W-3	5/17/2001			1,500	440 J
0	8/21/2001			700	360 J
	3/1/2002			810	750
	8/27/2002			1,100	540 J
	11/26/2002			850	260 J

Table 5 Analytical Results for Total Petroleum Hydrocarbons in Groundwater

	1				1
			TPH		
		Oil and Grease	(undifferentiated)	TPH-Diesel	TPH-Oil
Well ID	Date Sampled	(µg/L)	(µg/L)	(µg/L)	(µg/L)
	MTCA Method A	500	500	500	500
	2/6/2003			2,600	1,200
	5/15/2003			1,000	350 J
	8/20/2003			1,000	290 J
	11/14/2003			820	260 J
	2/26/2004			880	260 J
	5/27/2004			1,600	380 J
	8/30/2004			950	230 J
	11/18/2004			1,800 J	960 U
	2/24/2005			1,400	250 J
W-3	5/23/2005			2,000	480 J
(continued)	8/30/2005			470	98 U
	11/29/2005			850	390 J
	2/23/2006			480	110 U
	8/24/2006			683	481
	11/27/2006			1,310	153
	2/12/2007			863	169
	8/29/2007			1,360	95.2 U
	2/11/2008			1,720	508
	8/28/2008			2,100	1,840
	2/12/2009			1,400	364
W-4	3/2/1990		23,200		
W-5	3/2/1990		3,800		
	12/7/2000			32,000	15,000 J
	3/19/2001			25,000	10,000
	5/16/2001			49,000	23,000 J
	8/21/2001			20	6,400 J
	2/28/2002			680	740
	8/27/2002			160,000	71,000
	11/26/2002			3,600	3,300 J
	2/6/2003			8,800	6,300
	5/15/2003			18,000	11,000
	8/20/2003			59,000	29,000
	11/14/2003			6,100	3,700 J
	2/26/2004			20,000	15,000
W-6	5/27/2004			19,000	16,000
	8/30/2004			10,000	6,400
	11/18/2004			900 J	530 J
	2/24/2005			13,000	11,000
	5/23/2005			8,800	5,000 J
	8/30/2005			170,000	120,000
	11/29/2005			1,500	2,600
	2/23/2006			270	610
	8/24/2006			3,300	1,580
	11/27/2006			1,030	429
	2/12/2007			1,660	532
	8/29/2007			2,080	756
	2/21/2008			1,590	890

Table 5 Analytical Results for Total Petroleum Hydrocarbons in Groundwater

Well ID	Date Sampled	Oil and Grease (µg/L)	TPH (undifferentiated) (µg/L)	TPH-Diesel (μg/L)	TPH-Oil (µg/L)
	MTCA Method A	500	500	500	500
W-6	8/26/2008			27,900	23,800
(continued)	2/12/2009			444	323

 $J = The result is an approximation <math>\mu g/L = microgram per liter$

MTCA = Model Toxics Control Act

TPH = Total Petroleum Hydrocarbon

U = Analyte not detected above the reporting limit indicated

-- = Not analyzed

Bold and cell in orange = Result greater than MTCA Method A cleanup level cell in yellow = analyte not detected, but reporting limit is greater than MTCA Method A cleanup level

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (μg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (μg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
	3/27/1991		1 U	1 U	1 U	1 U		
	6/24/1991		1 U	1 U	1 U	1 U		
D O wall	12/26/1991	50 U	0.5 U	0.5 U	0.5 U	0.5 U		
B-2_well	12/9/1993	50 U	0.5 U	0.5 U	1.1	1 U	2.8	20
	11/21/1995	50 U	0.78	0.5 U	0.5 U	1 U		
	3/27/1991		1 U	1 U	1 U	1 U		
	3/17/1988		27	12.7	30	192		
	3/27/1991		5	4	7	6		
	6/24/1991		1	1 U	1 U	1 U		
	9/26/1991	1,800	19	0.5 U	0.5 U	7.2		
MW-10	12/26/1991	960	11	0.5 U	0.55	2.5		
	12/9/1993	1,100	0.88	0.5 U	1.6	3.8	2.3	65
	11/22/1995	1,300	1.3	0.5 U	0.5 U	2		
	12/8/2000	1,100	0.84 J	4	1.1	4.1		
	2/28/2002	1,100	0.86 J	1 U	0.73 J	5		
	3/17/1988		149	18.5	12	160		
	3/27/1991		205	68	25	86		
	6/24/1991		36	15	13	20		
	9/26/1991	440	3.7	0.5 U	0.5 U	1.1		
	12/9/1993	880	90	9.9	0.5 U	25	5.5	110
	11/22/1995	790	36	1.8	0.8	1.6		
	12/8/2000	48 U	2.8	0.2 U	0.22 J	0.6 U		
	3/19/2001	48 U	0.46 J	0.2 U	0.2 U	0.6 U		
	5/16/2001	48 U	0.2 U	0.2 U	0.2 U	0.6 U		
	8/21/2001	48 U	0.2 U	0.2 U	0.2 U	0.6 U		
	2/28/2002	48 U	0.2 U	0.2 U	0.2 U	0.6 U		
	8/27/2002	48 U	1.3	0.2 U	0.2 U	0.6 U		
	11/26/2002	48 U	0.94 J	0.2 U	0.2 U	0.6 U		
	2/6/2003	48 U	0.92 J	0.2 U	0.2 U	0.6 U		
	5/15/2003	70 J	4.4	1.5	8.7	9.3		
MW-11	8/20/2003	48 U	0.2 U	0.2 U	0.3 J	0.6 U		
	11/14/2003	48 U	0.5 J	0.6 J	0.9 J	3.2		
	2/26/2004	48 U	0.2 U	0.5 J	0.2 U	1.7 J		
	5/27/2004	48 U	0.2 U	0.3 J	0.5 J	1.2 J		
	11/18/2004	48 U	0.9 J	0.6 J	0.8 J	2.4 J		
	2/24/2005	48 U	0.2 U	0.5 J	0.4 J	2.1 J		
	5/23/2005	140 J	1	3.5	9.5	19		
	8/30/2005	48 U	0.2 U	0.2 U	0.2 U	0.6 U		
	11/29/2005	48 U	0.2 U	0.2 U	0.2 U	0.6 U		
	2/23/2006	51 J	0.9 J	1.8	2.8	6.8		
	8/24/2006	100 U	1 U	1 U	1 U	3 U		
	11/27/2006	100 U	1 U	1 U	1 U	3 U		
	2/12/2007	100 U	1 U	1 U	1 U	3 U		
	8/29/2007	1 U	1 U	1 U	1 U	3 U		
	2/11/2008	2,300	21.1	4.44	2.65	13.5		
	2/12/2009	100 U	1 U	1 U	1 U	3 U		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (μg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (µg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
	3/17/1988		218	2 U	7.2	146.5		
	3/27/1991		1 U	1 U	1 U	3		
	6/24/1991		1 U	1 U	1 U	1 U		
MW-12	9/26/1991	160	2.1	0.42	0.5 U	0.56		
	12/26/1991	65	20	0.5 U	0.43	2.9		
	12/9/1993	50 U	21	0.5 U	0.86	3.2	4.3	23
	11/22/1995	50 U	9.2	0.5 U	0.5 U	1		
	3/17/1988		163	42	8.9	169.8		
	3/27/1991		1 U	2	1	1		
MW-13	6/24/1991		1 U	1 U	1 U	1 U		
10100-13	9/26/1991	500 U	0.5 U	0.5 U	0.5 U	0.5 U		
	12/9/1993	50 U	2.2	0.5 U	0.5 U	1 U	5.5	30
	11/22/1995	120	5.2	0.5 U	0.5 U	1 U		
	3/17/1988		850	108	351	1,453		
	3/27/1991		5	31	9	204		
	6/24/1991		7	13	2	29		
MW-15	9/26/1991	220	0.5 U	0.5 U	0.5 U	0.5 U		
	12/26/1991	890	15	34	1.1	69		
	12/9/1993	140	1.4	1.8	0.95	1.8	3.7	19
	11/21/1995	4,800	540	26	9.8	140		
	3/17/1988		2.5 U	2 U	2 U	2 U		
	3/27/1991		1 U	1 U	1 U	1 U		
	6/24/1991		1 U	1 U	1 U	1 U		
MW-16	9/26/1991	500 U	0.5 U	0.5 U	0.5 U	0.5 U		
	12/26/1991	50 U	0.5 U	0.5 U	0.5 U	0.5 U		
	12/9/1993	50 U	0.5 U	0.5 U	0.7	1 U	2.8	21
	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
	3/17/1988		2.5 U	2 U	2 U	2 U		
	3/27/1991		44	1 U	1 U	1 U		
	6/24/1991		280	1	4	2		
MW-17	9/26/1991	2,600	1,100	0.5 U	0.5 U	0.5 U		
	12/26/1991	1,100	480	1.3	2.2	4		
	12/9/1993	50 U	20	0.5 U	0.88	1.4	6.5	10
	11/21/1995	50 U	66	0.5 U	0.53	1 U		
	3/17/1988		800	115	194	1,941		
	3/27/1991		141	24	22	158		
	6/24/1991		1 U	1 U	1 U	1 U		
MW-18	9/26/1991	750	0.69	0.5 U	0.5 U	2.4		
10100-10	12/26/1991	4,400	223	24	0.5 U	0.5 U		
	12/9/1993	1,700	140	8.3	0.5 U	58	6.1	230
	11/21/1995	4,000	170	5.9	2 U	3.7		
	2/28/2002	1,300	110	0.98 J	1.6	7.8		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

		TPH-				Total	Dissolved	Total
Well ID	Date Sampled	Gas (µg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (μg/L)	Xylene (μg/L)	Lead (µg/L)	Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
	3/27/1991		1 U	1 U	1 U	1 U		
	6/24/1991		1 U	1 U	1 U	1 U		
	9/26/1991	150	0.5 U	0.5 U	0.5 U	0.5 U		
	12/26/1991	130	0.5 U	0.5 U	0.5 U	0.5 U		
	12/7/2000	700	0.2 U	2.2	0.2 U	3		
	3/19/2001	580	0.2 U	5 U	1 U	6.7		
	5/16/2001	48 U	0.2 U	0.2 U	0.2 U	0.6 U		
	8/21/2001	400	0.2 U	0.2 U	1.1	1.3 J		
	2/28/2002	220 J	0.2 U	0.2 U	0.2 U	2 J		
	8/27/2002	160 J	0.2 U	0.2 U	0.2 U	0.81 J		
	11/26/2002	210 J	0.21 J	0.2 U	0.2 U	0.92 J		
	2/6/2003	260	0.34 J	0.2 U	0.2 U	0.66 J		
	5/15/2003	300	1.8	0.9 J	5 U	6.6		
	8/20/2003	240 J	15	0.7 J	1.2	2.7 J		
	11/14/2003	220 J	0.3 J	0.3 J	0.3 J	1.4 J		
MW-19	2/26/2004	93 J	0.2 U	0.2 U	0.2 U	0.6 U		
10100	5/27/2004	210 J	0.2 U	0.2 U	0.2 U	0.6 U		
	8/30/2004	230 J	0.2 U	0.2 U	1 U	1.1 J		
	11/18/2004	130 J	0.2 U	0.2 U	0.2 U	0.6 U		
	2/24/2005	180 J	0.2 U	0.2 U	0.2 U	1.2 J		
	5/23/2005	4,600	63	92	340	530		
	8/30/2005	160 J	0.2 U	0.2 U	0.2 U	0.6 U		
	11/29/2005	48 U	0.2 U	0.2 U	0.2 U	0.6 U		
	2/12/2006	336	1 U	1 U	1 U	3 U		
	2/23/2006	350	0.3 J	0.2 U	0.2 U	0.6 U		
	8/24/2006	100 U	1 U	1 U	1 U	3 U		
	11/27/2006	100 U	1 U	1 U	1 U	3 U		
	8/29/2007	208	1 U	1 U	1 U	3 U		
	2/11/2008	250 U	1 U	1 U	1 U	3 U		
	8/28/2008	135	1 U	1 U	1 U	3 U		
			1 U					
	2/12/2009	187		1 U	1 U	3 U 1 U		
	3/27/1991		1 U	1 U	1 U			
	6/24/1991		1 U	1 U	1 U	1 U		
	9/26/1991	110	0.5 U	0.5 U	0.5 U	0.5 U		
MW-20	12/26/1991	50 U	0.5 U	0.5 U	0.5 U	0.5 U		
	12/7/2000	84 J	0.21 J	0.2 U	0.2 U	0.99 J		
	3/19/2001	69 J	0.2 U	0.2 U	0.2 U	0.6 U		
	5/17/2001	68 J	0.2 U	0.2 U	0.2 U	0.61 J		
	2/28/2002	56 J	0.2 U	0.2 U	0.2 U	0.6 U		
N 40 4 4 4	3/27/1991		3	2	2	25		
MW-21	6/24/1991		9	110	220	560		
	2/28/2002	310	0.62 J	1.5	1	2.8 J		
MW-22	3/27/1991		1 U	1 U	2	7		
22	12/26/1991	4,500	0.5 U	0.5 U	0.5 U	0.5 U		
MW-23	3/27/1991		1 U	1 U	2	8		
7 20	6/24/1991		1 U	1 U	1 U	2		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (μg/L)	Benzene (µg/L)	Ethylbenzene (μg/L)	Toluene (µg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
MW-24	3/27/1991		1 U	1 U	2	1		
	6/24/1991		1 U	3	7	9		
MW-27	9/26/1991	500 U	0.5 U	0.5 U	0.5 U	0.5 U		
	11/21/1995	160	0.5 U	0.5 U	0.5 U	1 U		
	6/24/1991		1 U	1	1	3		
	9/26/1991	500 U	0.5 U	0.5 U	0.5 U	0.5 U		
MW-28	12/26/1991	59	0.5 U	0.5 U	0.5 U	0.5 U		
	12/9/1993	94	0.5 U	0.5 U	0.5 U	1 U	2 U	120
	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
	6/24/1991		40	0.5 U	150	70		
MW-30	9/26/1991	280	1.6	0.5 U	0.5 U	0.68		
10100-30	12/26/1991	680	1.8	0.5 U	0.5 U	0.5 U		
	12/9/1993	320	1.6	0.5 U	0.5	1.3	2 U	11
MW-31	12/9/1993	50 U	0.5 U	0.5 U	0.5 U	1 U	2 U	24
10100 31	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
MW-32	12/9/1993	50 U	0.5 U	0.5 U	0.5 U	1 U	2.2	92
10100 32	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
MW-33	12/9/1993	50 U	0.5 U	0.5 U	1.7	1 U	4.7	99
10100	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
	12/9/1993	50 U	2.9	0.5 U	0.5 U	1.6	2.8	77
MW-35	11/22/1995	50 U	2.7	0.5 U	0.5 U	1.7		
55	12/8/2000	48 U	0.62 J	0.2 U	0.32 J	3 U		
	3/19/2001	48	0.2 U	0.2 U	0.2 U	0.6 U		
MW-36	12/9/1993	50 U	0.5 U	0.5 U	0.75	1 U	2 U	45
	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
MW-37	12/9/1993	3,900	630	26	0.5 U	12	2 U	140
	11/21/1995	50 U	0.5	0.5 U	0.5 U	1 U		
	12/8/2000	950	19	2.9	3.5	4.2		
	3/19/2001	1,400	28	1.4	3.6	8.4		
	5/16/2001	1,300	25	2.1	5.6	9		
	8/21/2001	1,600	30	3.1	2.3	5.8		
	2/28/2002	1,300	21	1.2	2.4	5.8		
	8/27/2002	1,200	23	1.6	4.4	7.1		
	11/26/2002	1,800	14	0.8 J	1.6	4.9		
	2/6/2003	1,900	21	1.1	2.3	5.1		
MM 40D	5/15/2003	1,700	21	1.5	5.4	7.9		
MW-40R	8/20/2003	1,200	17	1.6	4.3	7		
	11/14/2003	1,600	12	1.7	3	9		
	2/26/2004	1,400	13	1.1	2.8	6.6		
	5/27/2004	980	10	0.9 J	2.4	4.5		
	8/30/2004	1,100	11	1.4	4.2	7.6		
	2/24/2005	1,200	9.1	1.3 12	2.4	6.7		
	5/23/2005	1,700	17		42 6.4	69		
	8/30/2005 11/29/2005	910	13 10 U	2.6 1.4	6.4	8.8 5.6		
	2/23/2006	1,100 1,200	10 U	1.4	2.6 3.1	5.6		
	2/23/2000	1,200	100	1.4	J. I	5.0		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (μg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (μg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
	8/24/2006	410	6.38	1 U	1.88	7.55		
	11/27/2006	1,390	6.42	2.68	1.32	5.05		
MW-40R	2/12/2007	1,560	6.38	3.14	1 U	3 U		-
_	8/29/2007	1,000	6.6	1 U	1.5	3.48		-
(continued)	2/11/2008	1,100	3.18	1.09	1.24	7.12		-
	8/28/2008	1,070	4.91	1.2	2.29	5.97		
	2/12/2009	855	3.65	1.25	3.39	6.4		
	3/17/1988		2.5 U	2 U	2 U	2 U		
	3/27/1991		1 U	1 U	1 U	1 U		
	6/24/1991		1	1 U	1 U	1 U		
MW-6	9/26/1991	500 U	0.5 U	0.5 U	0.5 U	0.5 U		
	12/26/1991	760	47	45	8.3	19		
	12/9/1993	50 U	0.5 U	0.5 U	0.83	1 U	12	14
	11/21/1995	50 U	0.5 U	0.5 U	0.5 U	1 U		
MW-7	3/17/1988		2.5 U	2 U	2 U	2 U		
	3/17/1988		1,050	359	37	237		
N 4) A / O	6/24/1991		47	5	72	17		
MW-8	12/9/1993	130	0.71	0.5 U	0.5	1 U	3.2	79
	11/21/1995	110	7.7	0.5 U	0.5 U	1 U		
	3/17/1988		2.5 U	2 U	2 U	2 U		
	3/27/1991		140	8	3	20		
	6/24/1991		280	1	4	2		
MW-9	9/26/1991	220	1.1	0.5 U	0.5 U	0.54		
	12/26/1991	50 U	9.3	0.5 U	0.5 U	0.5 U		
	12/9/1993	50 U	6.7	0.5 U	0.5 U	1 U	4.2	70
	11/21/1995	50 U	1.3	0.5 U	0.5 U	1 U		
	2/11/2008	250 U	1 U	1 U	1 U	3 U		
MW-A1	8/28/2008	134	1 U	1 U	1 U	3 U		
	2/12/2009	145	1 U	1 U	1 U	3 U		
	2/11/2008	250 U	1 U	1 U	1 U	3 U		
MW-A2	8/28/2008	159	1 U	1 U	1 U	3 U		
	2/12/2009	188	1 U	1 U	1 U	3 U		
	8/22/1989		1 U	1 U	1 U	1 U		
5,44.4.4	3/27/1991		5	1 U	1 U	8		
RW-1/	6/24/1991		1 U	1 U	1 U	1		
MW-14	9/26/1991	2,200	410	19	6.4	10		
	12/26/1991	3,200	590	170	11	56		
RW-2	2/11/2002	1,300 J	110	0.98 J	1.6	7.8		
UG-2	9/25/2000	5.98	61	2.5 U	7.45 U	31 U		
UG-8	9/25/2000	5.31						
W-15R	2/28/2002	5,000	520	8.1	7.8	11		
	12/7/2000	2,600	0.67 J	0.2 U	6.6	3.2		
	3/19/2001	2,000	0.2 U	10 U	1.1	11		
W-17	5/16/2001	500	0.2 U	0.2 U	0.51 J	2.8 J		
	8/21/2001	1,900	1 U	0.54 J	0.2 U	0.6 U		
W-2	3/2/1990		0.3 U	0.3 U	0.5	1		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (μg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (μg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Total Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
	3/2/1990		0.3 U	0.3 U	0.3 U	0.3 U		
	12/7/2000	410	0.2 U	0.72 UJ	1 U	1.2 J		
	3/19/2001	280	0.2 U	0.2 U	0.2 U	0.8 J		
	5/17/2001	290	0.2 U	0.2 U	0.2 U	0.61 J		
	8/21/2001	230 J	0.2 U	0.2 U	0.47 J	0.6 U		
	3/1/2002	84 J	0.2 U	0.2 U	0.2 U	0.6 U		
	8/27/2002	460	0.2 U	0.2 U	0.2 J	0.6 U		
	11/26/2002	460	1 U	0.2 U	0.2 U	0.6 J		
	2/6/2003	390	1 U	0.2 U	0.26 J	0.94 J		
	5/15/2003	400	1.6	1 J	4.4	6.5		
	8/20/2003	290	0.2 U	0.2 U	0.2 U	0.6 U		
	11/14/2003	370	3.8	1.5	3	7.3		
	2/26/2004	200 J	0.2 J	0.2 U	0.2 U	0.9 J		
W-3	5/27/2004	200 J	0.2 J	0.3 J	0.5 J	1.2 J		
VV-3	8/30/2004	220 J	0.4 J	0.8 J	5 U	5 U		
	11/18/2004	390	1.3	0.9 J	1.3	3.7		
	2/24/2005	230 J	0.2 U	0.2 U	0.2 U	0.6 U		
	5/23/2005	550	2.3	5.3	17	30		
	8/30/2005	170 J	0.2 U	0.2 U	0.2 U	0.6 U		
	11/29/2005	450	0.2 U	0.2 U	0.2 U	0.6 U		
	2/23/2006	270	2 U	1.2	2.2	4.8		
	8/24/2006	100 U	1 U	1 U	1 U	3 U		
	11/27/2006	102	1 U	1 U	1 U	3 U		
	2/12/2007	352	1 U	1 U	1 U	3 U		
	8/29/2007	190	1 U	1 U	1 U	3 U		
	2/11/2008	271	1 U	1 U	1 U	3 U		
	8/28/2008	314	1 U	1 U	1 U	3 U		
	2/12/2009	239	1 U	1 U	1 U	3 U		
W-4	3/2/1990		7	17	7	15		
W-5	3/2/1990		3.5	0.3 U	0.3 U	0.3 U		
	12/7/2000	3,400	0.2 U	0.2 U	1 U	8		
	3/19/2001	3,400	0.39 J	20 U	3.2	27		
	5/16/2001	710	0.2 U	2 U	0.5 J	3.5		
	8/21/2001	2.2	1.1	7.3	0.2 U	0.6 U		
	2/28/2002	120 J	1.7	1.2	0.4 J	3.5		
	8/27/2002	850	1.8	0.2 U	2.5	3 U		
144.0	11/26/2002	2,300	1	1 U	1 U	10 U		
W-6	2/6/2003	400	3.3	0.6 J	0.89 J	2.7 J		
	5/15/2003	400	4.7	1.7	9.4	11		
	8/20/2003	530	1.4	1 U	1.9	3 U		
	11/14/2003	700	12	7.9	14	39		
	2/26/2004	150 J	1 U	2 U	1 U	3 J		
	5/27/2004	380	5	7.2	18	35		
	8/30/2004	220 J	0.9 J	0.3 J	1.6	2.2 J		
	11/18/2004	79 J	1.8	0.9 J	1.5	3.9		

Table 6 Analytical Results for TPH as Gasoline, Benzene, Toluene, Ethylbenzene, Total Xylenes, and Lead in Groundwater

Well ID	Date Sampled	TPH- Gas (μg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	(µg/L)	Total Xylene (µg/L)	Dissolved Lead (µg/L)	Lead (µg/L)
MTCA Metho	od A Cleanup Level	1,000/800	5	700	1,000	1,000	15	15
	2/24/2005	230 J	0.8 J	1 U	0.9 J	3 J		
	5/23/2005	2,900	22	53	170	300		
	8/30/2005	190 J	1.2	0.2 U	0.7 J	0.6 U		
	11/29/2005	48 U	0.2 U	0.2 U	0.2 U	0.6 U		
	2/23/2006	48 U	0.2 U	0.2 U	0.2 U	0.6 U		
W-6	8/24/2006	100 U	1 U	1 U	2.33	3 U		
(continued)	11/27/2006	670	1 U	1 U	1 U	3 U		
	2/12/2007	835	1.28	1 U	1.32	3 U		
	8/29/2007	603	1.03	1 U	1.08	3 U		
	2/21/2008	372	1.18	1 U	1 U	3 U		
	8/26/2008	1 U	1 U	1 U	1 U	3 U		
	2/12/2009	280	1 U	1 U	1 U	3 U		

J = The result is an approximation

μg/L = microgram per liter

MTCA = Model Toxics Control Act

TPH = Total Petroleum Hydrocarbon

U = Analyte was not detected above the reporting limit indicated

UJ = Analyte was not detected above the reporting limit. Indicated value is estimated reporting limit.

-- = Not analyzed

Bold and cell in orange = Result greater than MTCA Method A cleanup level

Bold and cell in yellow = Analyte not detected, but reporting limt is greater than MTCA Method A cleanup level.

Table 7 Analytical Results for Polycyclic Aromatic Hydrocarbons in Groundwater

Well ID	Date Sampled	Acenaphthene (µg/L)	Acenaphthylene (μg/L)	Anthracene (µg/L)	Benzo(a) anthracene* (µg/L)	Benzo(a) pyrene* (µg/L)	Benzo(b) fluoranthene* (µg/L)	Benzo(g,h,i) perylene (µg/L)	Benzo(k) fluoranthene* (µg/L)	Chysene* (µg/L)	Dibenz(a,h) anthracene* (µg/L)	Fluoranthene (µg/L)	Fluorene (µg/L)	Indeno(1,2,3-cd) pyrene* (µg/L)	Naphthalene (µg/L)	Phenanthrene (µg/L)	Pyrene (µg/L)	cPAHs¹ (μg/L)
	CA Method A	(I-3-)	(1.3-)	(1-3- /	(1-3-7	(1-3- /	(1-3- 7	(1-3-7	(1-3- 7	(1-3- /	(1-3-7	(1-3- /	(1-3-7	(1-3- /	(1-3-)	(1-3-)	(1-3-7	(I-3- /
	Cleanup Level					0.1												0.1
	CA Method B																	· · · · · · · · · · · · · · · · · · ·
	Cleanup Level																	ı
	Carcinogenic																480	ı
МТ	CA Method B																	1
	Cleanup Level																	ı
Non-	Carcinogenic	960		4,800											160			Į
B-2_well	12/1/1993	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
	12/1/1995	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
MW-6	12/1/1993	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
MW-8	12/1/1993 12/1/1995	1 U 5 U	1 U 5 U	1 U 5 U	0.1 U 0.41	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 1.2	0.1 U 0.1 U	0.1 U 0.1 U	1 U 5 U	0.1 U 0.1 U	1 U 5 U	1 U 5 U	0.5 U 0.5 U	0.0755 U 0.123
	12/1/1993	1 U	1 U	1 U	0.41 0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	1 U	0.1 U	1 U	1 U	0.5 U	0.123 0.0755 U
MW-9	12/1/1995	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
	12/1/1993	1 U	1 U	1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	1.2	1 U	0.1 U	1 U	1 U	1.1	0.0755 U
MW-10	11/22/1995	5 U	5 U	5 U	0.65	0.29	0.15	0.19	0.1 U	3.7	0.28	1.5	5 U	0.1 U	5 U	5 U	1.6	0.445
10100	12/8/2000	8.1 U	9.9 J	2	2.75	2.07	1.73	2.1 J	0.58 J	10.3	0.3 U	5.7	5 J	2.36 J	8.1 U	13.1	19.2	2.93
	2/28/2002	3 J	2 J	0.4	0.1	0.1	0.1 J	0.2 J	0.05 J	0.08 U	0.04 U	0.8	1	0.1 J	1 U	2	1	0.1374
	12/1/1993	2.1 0.76 U	1 U	1.1	4.9	1.4	0.1 U	0.1 U	0.45	1.3	0.1 U	1.7	1.8	1 0 000 11	1 U 0.76 U	4.1	3.8	2.058 0.01756
	12/8/2000 3/19/2001	0.76 U	0.76 U 0.76 U	0.028 U 0.038 J	0.019 U 0.047 J	0.019 U 0.03 J	0.036 U 0.036 U	0.095 U 0.095 U	0.0095 U 0.0095 U	0.057 U 0.057 U	0.028 U 0.028 U	0.028 U 0.082 J	0.16 U 0.16 U	0.063 U 0.063 U	0.76 U	0.068 U 0.095 J	0.16 U 0.16 U	0.01756
MW-11	5/16/2001	0.8 U	2.7 J	0.030 J	0.047 J	0.03 J	0.4 U	0.09 U	0.0033 U	0.037 U	0.03 U	0.054 J	0.43 J	0.003 U	2.7 J	0.033 3 0.07 U	0.10 J	0.0761
	8/21/2001	0.8 U	0.8 U	0.03 U	0.05 J	0.04 J	0.04 U	0.09 U	0.01 J	0.16 J	0.03 U	0.03 U	0.2 U	0.06 U	0.8 U	0.07 U	0.2 U	0.0541
	2/28/2002	0.8 U	0.8 U	0.04 U	0.02 U	0.02 U	0.04 U	0.1 U	0.02 U	0.08 U	0.04 U	0.04 U	0.2 U	0.08 U	1 U	0.08 U	0.2 U	0.0204 U
MW-12	12/1/1993	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.11	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
10100-12	11/22/1995	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	61	0.1 U	0.22	5 U	0.1 U	5 U	5 U	0.5 U	0.685
MW-13	12/1/1993	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
	11/22/1995 12/1/1993	5 U 5 U	5 U 5 U	5 U 5 U	0.76 0.1 U	0.1 U	1.4 0.1 U	2.2 0.1 U	0.72	2.5 0.1 U	0.83 0.1 U	2.2 0.1 U	5 U	1.2 0.1 U	5 U 5 U	5 U 5 U	2 0.5 U	2.516
MW-15 MW-16	12/1/1993	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U 0.1 U	0.1 U	0.1 U	0.1 U	5 U 5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U 0.0755 U
MW-17	12/1/1993	5 U	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.0755 U
	12/1/1993	17	5 U	5 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	17	13	0.1 U	5 U	5 U	0.5 U	0.0755 U
MW-18	12/1/1995	8	5 U	5 U	7.4	0.1 U	0.1 U	0.1 U	0.1 U	20	0.1 U	13	13	0.1 U	7.2	23	9.2	1.01
	2/28/2002	1 J	3 J	0.3 U	0.03 J	0.04 J	0.04 U	0.1 U	0.02 U	0.08 U	0.04 U	0.3	0.5 J	0.08 U	1 U	0.4	0.8 U	0.0524
	12/7/2000	0.77 U	2.6 J	0.029 U	0.019 U	0.019 U	0.037 U	0.096 U	0.0096 U	0.123 J	0.029 U	0.029 U	0.16 U	0.064 U	0.77 U	0.067 U	0.16 U	
NAVA / 40	3/19/2001	0.76 U	4.29 J	0.029 U	0.019 U	0.019 U	0.036 U	0.095 U	0.0095 U	0.057 U	0.029 U	0.029 U	0.27 J	0.064 U	0.79 J	0.067 U	0.16 U	0.01766 U
MW-19	5/16/2001 8/21/2001	0.6 U 0.8 U	6.6 J 0.8 U	0.17 J 0.03 U	0.02 U 0.02 U	0.02 U 0.02 U	0.04 U 0.04 U	0.09 U 0.09 U	0.009 U 0.009 U	0.06 U 0.06 U	0.03 U 0.03 U	0.03 U 0.03 U	0.78 J 0.21 J	0.06 U 0.06 U	0.8 U 0.8 U	0.7 U 0.06 U	0.2 U 0.2 U	0.01825 U 0.01825 U
	2/28/2002	0.8 U	0.8 U	0.03 U	0.02 U	0.02 U	0.04 U	0.09 U	0.009 U	0.08 U	0.03 U	0.03 U	0.21 J	0.08 U	1 U	0.08 U	0.2 U	0.01823 U
	12/7/2000	1.3 J	2.53 J	0.159 J	0.02 U	0.02 U	0.037 U	0.098 U	0.0098 U	0.059 U	0.029 U	0.047 J	1.03	0.066 U	2.47 J	0.136 J	0.58 J	0.018385 U
NANA / 00	3/19/2001	0.76 U	0.76 U	0.19	0.019 U	0.019 U	0.036 U	0.095 U	0.0095 U	0.057 U	0.028 U	0.056 J	1.05	0.064 U	0.76 U	0.144 J	0.31 J	0.01761 U
MW-20	5/17/2001	0.9 J	2.3 J	0.3	0.02 J	0.02 J	0.04 U	0.1 U	0.01 J	0.06 U	0.035 J	0.16 J	1.3	0.073 J	0.8 U	0.35	1.4	0.0361
	2/28/2002	0.9 U	0.9 U	0.3	0.02 U	0.02 U	0.04 U	0.1 U	0.02 U	0.09 U	0.04 U	0.06 J	0.6 J	0.09 U	1 U	0.09 J	0.9 U	0.01995 U
MW-21	2/28/2002	4 U	4 U	5	2	0.9	2	0.5 U	0.3 J	12	0.3 J	1	6	0.9 J	5 U	7	1 U	1.57
MW-27	12/1/1995	5 U	5 U	5 U	2.1	0.1 U	0.1 U	0.1 U	0.1 U	0.8	0.1 U	1.4	5 U	0.1 U	5 U	5 U	1.5	0.288
MW-28	12/1/1993 12/1/1995	5 U 5 U	5 U 5 U	5 U 5 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U	0.1 U 0.1 U	0.1 U	0.1 U	0.1 U	5 U	0.1 U	5 U 5 U	5 U	0.5	0.0755 U
MW-30	12/1/1995	5 U	5 U	5 U	0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	0.18 0.1 U	0.1 U 0.1 U	0.1 U 0.1 U	5 U 5 U	0.1 U 0.1 U	5 U	5 U 5 U	0.5 U 0.5 U	0.0768 0.0755 U
	12/8/2000	0.79 U	0.81 J	0.045 J	0.02 U	0.1 U	0.037 U	0.098 U	0.0098 U	0.1 U	0.031 J	0.029 U	0.17 U	0.066 U	0.79 U	0.069 U	0.17 U	0.02268
MW-35	3/19/2001	0.77 U	0.77 U	0.029 U	0.02 J	0.019 U	0.037 U	0.096 U	0.0096 U	0.064 J	0.029 U	0.029 U	0.16 U	0.064 U	0.77 U	0.067 U	0.16 U	0.01912
MW-37	11/22/1995	5 U	5 U	5 U	0.1 U	0.1 U	0.14	0.1 U	0.1 U	0.1 U	2.8	0.1 U	5 U	0.1 U	5 U	5 U	0.5 U	0.3595

Table 7 Analytical Results for Polycyclic Aromatic Hydrocarbons in Groundwater

W. II IB			Acenaphthylene		anthracene*	Benzo(a) pyrene*	Benzo(b) fluoranthene*		Benzo(k) fluoranthene*		Dibenz(a,h) anthracene*	Fluoranthene		Indeno(1,2,3-cd) pyrene*	Naphthalene	Phenanthrene	Pyrene	cPAHs ¹
Well ID	Sampled	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
	CA Method A																	
С	leanup Level					0.1												0.1
	CA Method B																	
	leanup Level																	
	Carcinogenic																480	
MT	CA Method B																	
С	leanup Level																	
Non-	Carcinogenic	960		4,800											160			
	12/8/2000	3.8 U	27.3 J	0.6 J	0.45	0.243 J	0.18 U	0.48 U	0.048 U	1.9	0.14 U	0.73 J	4	0.4 J	4.4 J	2.9	6.4	0.3654
	3/19/2001	7.7 U	29.7 J	0.93 J	0.9	0.33 J	0.37 U	1 U	0.097 U	5.4	0.29 U	0.95 J	4.8 J	0.89 J	7.7 U	3.9	1.6 U	0.60085
MW-40R	5/16/2001	4 U	21 J	0.76 J	0.1 U	0.2 J	0.2 U	0.5 J	0.08 J	0.3 U	0.1 U	1	5	0.63 J	4 J	2.1	13	0.2925
	8/21/2001	8 U	8 U	0.96 J	1.4	0.6 J	0.7	0.9 U	0.2 J	7.7	0.3 U	1.5 J	6.3 J	0.68 J	8 U	5.7	21	0.99
	2/28/2002	4 U	4 U	0.2 U	0.3 J	0.3 J	0.3 J	0.5 U	0.1 U	0.4 U	0.2 U	1	3 J	0.4 U	5 U	3	0.9 U	0.397
W-15R	2/28/2002	50 J	40 J	78	9	5	4	3 J	2	26	0.5 U	51	90	3 J	10 U	200	2 U	7.085
	12/7/2000	4.6 J	5.6 J	2.2	2	1.45	0.97	1.1 J	0.4	8	0.14 U	4	6.5	1.28 J	3.8 U	14.4	27.9	2.002
W-17	3/19/2001	7.9 U	7.9 U	4.3	3.74	2.05	1.63	1.4 J	0.473 J	21.8	0.3 U	5.8	10.1	0.66 U	7.9 U	25.5	58.8	2.9003
	5/16/2001	6 J	6 J	5	2.1	1.7	1.1	0.5 U	0.7	7.6	0.46 J	8	12	2.5	4 U	7	95	2.462
	8/21/2001	8 U	8 U	5	4.4	2.1	1.9	0.9 U	0.7	23	0.3 U	9	19	0.6 U	6 U	37	120	3.075
	12/7/2000 3/19/2001	1.2 J 1.1 J	6.79 J 6.97 J	0.191 J 0.53	0.02 U 0.019 U	0.02 U 0.019 U	0.038 U 0.036 U	0.1 U 0.096 U	0.01 U 0.0096 U	0.06 U 0.057 U	0.03 U 0.029 U	0.03 U 0.029 J	0.76 J 1.44	0.067 U 0.064 U	1.29 J 1.35 J	0.071 J 0.067 U	0.17 U 0.16 U	0.01855 U 0.017665 U
W-3	5/17/2001	2.4 J	20	0.33	0.019 U	0.019 U	0.036 U	0.096 U	0.0096 U	0.057 U	0.029 U	0.029 3	3.2	0.064 U	1.35 3	0.007 0	0.16 0	0.017665 U
VV-3	8/21/2001	0.9 J	0.8 U	0.03 U	0.02 U	0.02 U	0.04 U	0.09 U	0.009 U	0.06 U	0.03 U	0.13 0.03 U	0.9	0.06 U	1.2 J	0.06 U	0.31 0.2 U	0.01825 U
	3/1/2002	0.9 U	0.9 U	0.03 U	0.02 U	0.02 U	0.04 U	0.03 U	0.003 U	0.00 U	0.03 U	0.03 U	0.5 J	0.00 U	1.2 3	0.00 U	0.2 U	0.01025 U
	12/7/2000	130 J	118 J	96	58.1	32	26.9	10 U	5.9 J	341	3 U	110	242	31	80 U	680	728	47.75
	3/19/2001	7.9 U	14 J	2.4	1.41	0.74 J	0.57 J	1 U	0.098 U	0.59 U	0.3 U	2.3	9.5	0.84 J	7.9 U	17.5	1.7 U	1.04485
W-6	5/16/2001	4 U	4 U	0.26 J	0.2 J	0.3 J	0.26 J	0.5 U	0.14 J	0.6 J	0.16 J	0.58 J	0.8 U	0.82 J	4 U	0.49 J	12	0.464
	8/21/2001	8 U	8 U	0.34 J	1.1	0.6 J	0.7	0.9 U	0.26 J	7.2	0.3 U	0.58 J	2.6 J	0.86 J	6 U	1.9 J	22	0.979
	2/28/2002	4 U	4 U	0.2 U	0.2 J	0.3 J	0.4 J	0.5 U	0.1 J	0.4 U	0.2 U	0.5 J	0.9 U	0.8 J	5 U	0.8 J	0.9 U	0.462

J = The result is an approximation

μg/L = microgram per liter

MTCA = Model Toxics Control Act

TEQ = toxicity-equivalent quotient

U = Analyte not detected above the reporting limit indicated

-- = Not analyzed

Bold and cell in orange = Result greater than MTCA Method A cleanup level.

^{*}Compound is cPAH constituent included in TEQ-adjusted total cPAH concentrations. Values for individual cPAH constituents are actual analytical results.

^{1.} Total cPAH concentration expressed as TEQ-adjusted concentration adjusted using Toxicity Equivalency Factors for Maximum Required cPAHs (Table 708-2 under WAC 173-340-708). cPAH = carcinogenic polycyclic aromatic hydrocarbon

Table 8 Statistical Summary of Soil Analytical Results

Parameter	CAS Number	Analyte	MTCA A Unrestricted (mg/kg)	MTCA A Industrial (mg/kg)	MTCA B Carcinogen (mg/kg)	MTCA B Noncarcinogen (mg/kg)	Indicator Hazardous Substance (yes/no)	Number Analyzed	Frequency of Detection (percent)	Maximum Detection Limit (mg/kg)	Minimum Detection Limit (mg/kg)	Maximum Result (mg/kg)	Minimum Result (mg/kg)	Average Result (mg/kg)	Number of Results Exceeding MTCA A Industrial	Number of Results Exceeding MTCA A Unrestricted	Number of Results Exceeding MTCA B Carcinogen	Number of Results Exceeding MTCA B Noncarcinogen
Metals	7439-92-1	Lead	250	1000			no	38	71	15	10	860	2.8	108	0	3	0	0
	120-12-7	Anthracene				24,000	no	22	18	2	0.1	4.9	0.1	1.4	0	0	0	0
	129-00-0	Pyrene				2,400	no	22	32	2	0.02	1.35	0.0482	0.62	0	0	0	0
		Benzo(g,h,i)perylene					no	22	23	2	0.01	0.744	0.0728	0.31	0	0	0	0
	193-39-5	Indeno(1,2,3-cd)pyrene					no	22	27	2	0.1	1.43	0.0157	0.31	0	0	0	0
		Benzo(b)fluoranthene					no	22	27	2	0.1	0.468	0.0173	0.20	0	0	0	0
	206-44-0	Fluoranthene				3,200	no	22	36	2	0.1	1.75	0.019	0.52	0	0	0	0
SVOCs		Benzo(k)fluoranthene					no	22	23	2	0.01	0.16	0.0365	0.097	0	0	0	0
	208-96-8	Acenaphthylene					no	22	14	2	0.1	2.98	0.168	1.4	0	0	0	0
	218-01-9	Chysene					no	22	27	2	0.1	25.2	0.0597	6.9	0	0	0	0
	50-32-8	Benzo(a)pyrene	0.1	2	0.14		yes	22	27	2	0.1	0.26	0.0106	0.10	0	3	2	0
	53-70-3	Dibenz(a,h)anthracene					no	22	14	2	0.01	0.409	0.0312	0.17	0	0	0	0
	56-55-3	Benzo(a)anthracene					no	22	23	2	0.01	4.25	0.0479	1.1	0	0	0	0
	83-32-9	Acenaphthene				4,800	no	22	9	2	0.1	1.27	0.32	0.80	0	0	0	0
	85-01-8	Phenanthrene					no	22	41	0.5	0.1	4.9	0.12	1.0	0	0	0	0
	86-73-7	Fluorene				3,200	no	22	18	2	0.1	3.52	0.17	1.6	0	0	0	0
	91-20-3	Naphthalene				1,600	no	22	5	2	0.1	1.1	1.1	1.1	0	0	0	0
	91-20-3	cPAH ¹	0.1	2	0.14		yes	22	27	1.51	0.0755	0.6868	0.03818	0.33	0	4	4	0
		Oil and Grease					na	12	83	5	5	33,500	174	5,356	0	0	0	0
Oil and	TPH	TPH	2,000	2,000			yes	152	91	10	5	730,000	7	11,470	58	58	0	0
Grease TPH	TPH-D	TPH-Diesel	2,000	2,000			yes	67	82	10	2	27,100	7	1,627	11	11	0	0
	TPH-G	TPH-Gas	30	30			yes	50	50	50	1	6,050	1	632	17	17	0	0
	TPH-O	TPH-Oil	2,000	2,000			yes	37	76	471	25	52,300	41	2,438	3	3	0	0
		Benzene	0	0			yes	80	30	34	0.01	15	0.04	2.70	3	3	0	0
voc		Ethylbenzene	6	6			no	80	15	8	0.01	5.3	0.02	0.90	0	0	0	0
VOC	108-88-3	Toluene	7	7			no	80	26	30.5	0.015	12.975	0.26	4.07	4	4	0	0
	1330-20-7	Total Xylene	9	9			no	80	15	2.5	0.015	6.6	0.035	1.25	12	12	0	0

1. Total cPAH concentration expressed as TEQ-adjusted concentration adjusted using Toxicity Equivalency Factors for Maximum Required cPAHs (Table 708-2 under WAC 173-340-708). CAS = Chemical Abstract Service

cPAH = carcinogenic polycyclic aromatic hydrocarbons

mg/kg = microgram per kilogram MTCA = Model Toxics Control Act

SVOC = Semivolatile Organic Compound

TPH = Total Petroleum Hydrocarbon

VOC = Volatile Organic Compound

ExxonMobil/ADC Everett Facility Project No.: 8-915-15716-C

 Table 9
 Statistical Summary of Groundwater Analytical Results

Parameter	CAS Number 7439-92-1	Analyte Total Lead	MTCA A Groundwater (μg/L)	(µg/L)	MTCA B Noncarcinogen (μg/L) 	Indicator Hazardous Substance (yes/no)	Number Analyzed	Frequency of Detection (percent)	Maximum Detection Limit	Minimum Detection Limit	Maximum Result (µg/L) 230	Minimum Result (µg/L)	Average Result (µg/L)	Number of Results Exceeding MTCA A	Number of Results Exceeding MTCA B Carcinogen	Number of Results Exceeding MTCA B Noncarcinogen
Metals		Dissolved Lead	15			no ves	20	75	2	2	12	2	03 	0		
		Anthracene	15		4,800	no	64	44	5	0.028	96	0.028	4.9	0	0	0
		Pyrene			480	no	64	38	2	0.028	728	0.028	18.25	0	0	1
		Benzo(g,h,i)perylene			400	no	64	13	10	0.18	10	0.16	0.51	0	0	0
	193-39-5	Indeno(1,2,3-cd)pyrene				no	64	30	0.66	0.09	31	0.09	0.85	0	0	0
		Benzo(b)fluoranthene				no	64	28	0.66	0.036	26.9	0.036	0.83	0	0	0
		Fluoranthene			640	no	64	56	0.4	0.030	110	0.038	3.84	0	0	0
		Benzo(k)fluoranthene			040	no	64	31	0.1	0.028	5.9	0.028	0.248	0	0	0
		Acenaphthylene				no	64	33	8	0.009	118	0.009	7.7	0	0	0
SVOCs		Chysene				no	64	41	0.59	0.057	341	0.057	8.9	0	0	0
37003		Benzo(a)pyrene	0.1			yes	64	41	0.39	0.037	32	0.037	0.89	20	0	0
		Dibenz(a,h)anthracene	0.1			no	64	13	3	0.013	3	0.013	0.03	0	0	0
		Benzo(a)anthracene				no	64	45	0.1	0.020	58.1	0.019	1.7	0	0	0
		Acenaphthene			960	no	64	23	8.1	0.6	130	0.6	6.46	0	0	0
		Phenanthrene			300	no	64	44	5	0.06	680	0.06	18.0	0	0	0
		Fluorene			640	no	64	52	5	0.16	242	0.16	8.8	0	0	0
	91-20-3	Naphthalene			160	no	64	16	80	0.76	80	0.76	5.0	0	0	0
	0. 20 0	cPAH ¹	0.1		160	yes	64	56	0.0755	0.01761	47.75	0.01756	1.32	36	26	0
	TPH O&G	Oil and Grease	na			na	12	100			132,000	2,700	31,150	12		
	TPH	TPH	500			yes	56	66	1,000	500	1,058,000	1.1	38,955	0		
Oil and Grease TPH	TPH-D	TPH-Diesel	500			yes	232	93	500	77	300,000	20	7,951	181		
	TPH-G	TPH-Gas	800			yes	231	69	500	1	5,980	1	671	59		
	TPH-O	TPH-Oil	500			yes	181	86	500,000	93.9	500,000	49	6,782	108		
		Benzene	5			yes	286	50	10	0.2	1,100	0.2	37.30	73		
VOC		Ethylbenzene	700			no	286	33	20	0.2	359	0.2	6.15	0		
VOC	108-88-3	Toluene	1000			no	286	43	7.45	0.2	351	0.2	7.47	0		
	1330-20-7	Total Xylene	1000			no	286	50	31	0.3	1,941	0.3	26.7	2		

1. Total cPAH concentration expressed as TEQ-adjusted concentration adjusted using Toxicity Equivalency Factors for Maximum Required cPAHs (Table 708-2 under WAC 173-340-708). CAS = Chemical Abstract Service

cPAH = carcinogenic polycyclic aromatic hydrocarbon

μg/L = microgram per liter

MTCA = Model Toxics Control Act

na = not available

SVOC = Semivolatile Organic Compound

TPH = Total Petroleum Hydrocarbon

VOC = Volatile Organic Compound

APPENDIX A

Sampling and Analysis Plan



SAMPLING AND ANALYSIS PLAN ExxonMobil / ADC Property, Ecology Site ID 2728 2717/2731 Federal Avenue Everett, Washington

Submitted to:

ExxonMobil Environmental Services

East Providence Terminal 1001 Wampanoag Trail Riverside, Rhode Island 02915

and

American Distributing Company

13618 45th Avenue NE Marysville, Washington 98271

Submitted by:

AMEC Earth & Environmental, Inc. 11810 North Creek Parkway North

Bothell, Washington 98011

September 4, 2009

AMEC Project No. 8-915-15716-C

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ACRONYMS AND ABBREVIATIONS

ADC American Distributing Company
AMEC AMEC Earth & Environmental, Inc.

bgs below ground surface

BTEX benzene, toluene, ethylbenzene, and xylenes

COC chain-of-custodies
CSS Colorado silica sand

DAHP Washington State Department of Archaeology and Historic Preservation

DQIs data quality indicators
DQOs data quality objectives

Ecology Washington State Department of Ecology

EDB ethylene dibromide EDC 1,2-dichloroethane

EPA U.S. Environmental Protection Agency EPH extractable petroleum hydrocarbons

ExxonMobil ExxonMobil Oil Corporation
FFS Focused Feasibility Study
HASP Health and Safety Plan
HSA hollow stem auger

IDW investigation derived waste mg/kg milligram per kilograms

mg/L milligram/liter

MDLs method detection limits

MS/MSD matrix spike/matrix spike duplicate

mV millivolt

NTUs nephelometric turbidity units
PAHs polycyclic aromatic hydrocarbons

PID photoionization detector

PPE personal protective equipment

ppm parts per million PVC polyvinyl chloride

Property ExxonMobil/ADC Property

QA quality assurance QC quality control

RPD relative percent difference SAP Sampling and Analysis Plan

SD standard deviation

TPH-D total petroleum hydrocarbons-diesel
TPH-O total petroleum hydrocarbons-oil
TPH-G total petroleum hydrocarbons-gasoline

VOCs volatile organic compounds
VPH volatile petroleum hydrocarbons
WAC Washington Administrative Code

WP Work Plan

SAMPLING AND ANALYSIS PLAN 2717/2731 FEDERAL AVENUE EVERETT, WASHINGTON September 4, 2009

1.0 INTRODUCTION

AMEC Earth & Environmental, Inc. (AMEC), has prepared this Sampling and Analysis Plan (SAP) as part of the Focused Feasibility Study (FFS) Work Plan (WP) on behalf of ExxonMobil Oil Corporation (ExxonMobil) and the American Distributing Company (ADC) for the ExxonMobil/ADC Property (the Property) located at 2717 and 2731 Federal Avenue in Everett, Washington (Figure 1). This SAP outlines supplemental field investigations that will be conducted at and near the Property to fill remaining data gaps and obtain the information required to complete the FFS for the Exxon Mobil/ADC Site (Washington State Department of Ecology [Ecology] Ecology Facility ID 2728). This SAP addresses the specific field sampling activities, chemical analyses, and quality assurance (QA) procedures that will be conducted during additional investigations at the Property.

2.0 OBJECTIVES

The objective of the soil and groundwater investigation is to collect additional data needed to define the nature and extent of contamination, support decisions regarding future environmental cleanup, and fill existing data gaps to provide the information necessary to complete the FFS. The soil and groundwater investigation will include the following activities.

- 1. Install four new shallow (15 feet deep) groundwater monitoring wells (MW-A3 through MW-A6), and one deep groundwater monitoring well (MW-A7) to define the western, northwestern, and northeastern limits of the dissolved-phase plume and to identify potential contamination associated with the former ADC Garage and Shop. Soil samples will be collected from each soil boring for laboratory analysis to ensure that additional petroleum hydrocarbon sources are not contributing to the existing plume (Figure 2).
- 2. Advance seven deep soil borings around the perimeter of the Property (AB-1 through AB-6) and off-Property to the northeast (MW-A7) to a maximum depth of 35 feet below ground surface (bgs) to determine if a silt layer is present beneath the fill and collect samples for geotechnical analysis. Deep boring MW-A7 will be backfilled to a depth of 13 feet bgs and converted to a shallow monitoring well screened from 3 to 13 feet bgs.
- 3. In addition, four of the six deep soil borings (AB-1, AB-2, AB-5, and AB-6) will be advanced around the perimeter of the Property to assist in evaluating the lateral extent of the secondary source areas 1, 2, and 4 (Section 7.2). Soil samples from borings AB-1 and AB-5 will be collected continuously from approximately 0.5 to 5 feet bgs. Shallow samples (above water table) with obvious signs of petroleum-hydrocarbon contamination will be analyzed for TPH-D and TPH-O.

- 4. Advance seven shallow soil borings (AP-1 through AP-7) to a maximum depth of 15 feet bgs. Six soil borings will be drilled east ortion of the Property (near former General Petroleum Corporation's spur fuel loading racks) to define the lateral and vertical extent of soil contamination in the vicinity of MW-29. The seventh boring will be drilled in the area of the former ADC Garage and Shop to determine if any hydrocarbons are present in soils beneath the shop floor.
- 5. Perform four quarters of groundwater sampling in all new monitoring wells and in five existing wells for natural attenuation parameters. Groundwater sampling for chemistry parameters will be conducted to be representative of separate wet and dry seasons. During two of the four quarterly sampling events, the groundwater sampling program will include general chemistry water quality parameters (i.e., dissolved oxygen, total organic carbon, alkalinity), in addition to the standard suite of laboratory analytical methods in select monitoring wells.
- Conduct aquifer testing in two monitoring wells to determine the hydraulic conductivity of off-Property aquifer materials. The aquifer testing will consist of slug tests conducted in newly constructed monitoring wells MW-A5 and MW-A6.
- 7. Undertake a comprehensive tidal influence study incorporating a temporary stilling well in Puget Sound as well as newly installed and existing groundwater monitoring wells.

3.0 PROJECT ORGANIZATION AND RESPONSIBILITIES

AMEC Earth & Environmental, Inc. (AMEC) is the environmental consultant for this project.

The project is organized as follows:

ExxonMobil and ADC are the owners of the Site.

- Gary Dupuy (phone number 206-342-1777) and Meg Strong (phone number 425-368-0966) are the client managers for the project
- Leah Vigoren (phone number 206-838-8470) is the project manager and is responsible for project management. Technical and administrative elements are included in her project management responsibilities.
- Stephen Dailey (phone number 206-342-1775) is the project engineer and is responsible for developing the site conceptual model and providing engineering input to the FFS.
- Anastasia Speransky (phone number 206-838-1776) is the task manager for the project and quality assurance manager for this project, which includes data quality objectives, and quality assurance/quality control (QA/QC) objectives.
- Heather Vick (phone number 206-838-8463) is the project hydrogeologist. She is responsible for hydrogeological field activities as well as health and safety.

 Test America, Inc., in Tacoma, Washington, is responsible for managing analyses of the samples collected. The laboratory is also responsible for sample preparation and ensuring that the QA/QC results from the laboratory are valid.

4.0 DATA QUALITY OBJECTIVES

Data Quality Objectives (DQOs) is a quality management tool developed by the U.S. Environmental Protection Agency (EPA) that is used to facilitate the planning of data collection activities. The DQO process provides a systematic procedure for defining criteria in the data collection design. The primary reference for the formal DQO process is EPA's guidance document (EPA 1994). The DQO process consists of the following seven key steps.

- 1. State the problem.
- 2. Identify the decision.
- 3. Identify the inputs to the decision.
- 4. Define the boundaries of the study.
- 5. Develop a decision rule.
- 6. Specify tolerable limits on decision errors.
- 7. Optimize the design for obtaining data.

DQOs are qualitative and quantitative statements, developed using the DQO process, that are intended to clarify study objectives, define an appropriate type of data, and specify tolerable levels of potential decision errors that will be used as the basis for establishing the quality and quantity of data needed to support decisions.

Table 1 provides the DQOs for the work described in this SAP. Table 2 provides a list of the indicator hazardous substances and their MTCA cleanup criteria.

Data Quality Indicators (DQI) (accuracy, precision, completeness, representativeness, comparability, and method detection limits) refer to quality control criteria established for various aspects of data gathering, sampling, or analysis activity. In defining DQIs specifically for the project, the level of uncertainty associated with each measurement is determined.

Accuracy is the degree of agreement of a measurement with a known or true value. To determine accuracy, a laboratory or field value is compared to a known or true concentration. Accuracy is determined by such quality control (QC) indicators as: matrix spikes (MS), surrogate spikes, laboratory control samples (blind spikes) and performance samples. The frequency of analysis of laboratory control samples will be as follows: Method NWTPH-Gx:1 every 20 samples; Method NWTPH-Dx:1 every 10 samples; Method NWTPH: 1 every 20 samples; Method NWTPH EPH: 1 every 20 samples; Method 8260B: 1 every 12 hours and Method 8270: 1 every 20 samples.

Precision is the degree of mutual agreement between or among independent measurements of a similar property (usually reported as a standard deviation [SD] or relative percent difference [RPD]). This indicator relates to the analysis of duplicate laboratory or field samples. An RPD of ≤50% for water and ≤50% for soil, depending upon the chemical being analyzed, is generally acceptable. Typically field precision is assessed by field duplicates and laboratory precision is assessed using laboratory duplicates, matrix spike duplicates, or laboratory control sample duplicates).

Completeness is expressed as percent of valid usable data actually obtained compared to the amount that was expected. Due to a variety of circumstances, sometimes either not all samples scheduled to be collected can be collected or else the data from samples cannot be used (for example, samples lost, bottles broken, instrument failures, laboratory errors, etc.). The minimum percent of completed analyses defined in this section depends on how much information is needed for decision making. Generally, completeness percent goals increase when the fewer the number of samples are collected per event or the more critical the data are for decision making. Goals in the 90 to 95% range are typical.

Representativeness is the expression of the degree to which data accurately and precisely represent a characteristic of an environmental condition or a population. It relates both to the area of interest and to the method of taking the individual sample. The idea of representativeness should be incorporated into discussions of sampling design. Representativeness is best assured by a comprehensive statistical sampling design, but it is recognized that this is usually outside the scope of most one-time events. Most one-time event SAPs focus on issues related to judgmental sampling and why certain areas are included or not included and the steps being taken to avoid either false positives or false negatives.

Comparability expresses the confidence with which one data set can be compared to another. The use of methods from EPA or "Standard Methods" or from some other recognized sources allows the data to be compared facilitating evaluation of trends or changes in a site, a river, groundwater, etc. Comparability also refers to the reporting of data in comparable units so direct comparisons are simplified (e.g., this avoids comparison of milligram/liter (mg/L) for nitrate reported as nitrogen to mg/L of nitrate reported as nitrate, or parts per million (ppm) vs. mg/L discussions).

Detection Limit(s) [usually expressed as method detection limits (MDLs) or Quantitation Limit(s)] for all analytes or compounds of interest for all analyses requested is presented on Table 1. These limits should be related to any decisions that will be made as a result of the data collection effort. A critical element to be addressed is how these limits relate to any regulatory or action levels that may apply.

Data Review and Management

Data management will commence during the field investigation. Each soil and groundwater sample collected will be recorded in a bound field book which will include a description of the location, depth, matrix, sample ID, and date and time of collection. Once data has returned from the laboratory, the electronic deliverables will be reviewed to ensure the receipt of all requested

analytes and again cross-checked with chain-of-custodies (COCs). Data will be tabulated in electronic spreadsheets and again checked to ensure proper entry before use in reporting.

Assessment Oversight

The project manager will ensure that sample methods and documentation are being practiced. Quality assurance (QA) systems will be emplaced at regular intervals during the data management process as described above. Finally, a peer review process by a senior technical staff will be conducted on the final reporting.

Corrective Actions

Corrective actions, if necessary, shall be completed. If acceptance criteria were not met and a corrective action was not successful or corrective action was not performed, data will be flagged appropriately. Requirements and procedures for documenting the need for corrective actions are described in this section.

Items requiring corrective action in the laboratory shall be documented by the use of a corrective action report. The QA coordinator or any other laboratory member can initiate the corrective action report request in the event QC results exceed acceptability limits, or upon identification of some other laboratory problem. Corrective actions can include reanalysis of the sample or samples affected, resampling and analysis, or a change in procedures, depending upon the severity of the problem.

5.0 PRE- FIELD ACTIVITIES

AMEC will arrange to clear the existing utilities in the project area prior to initiation of field activities. AMEC will contract a private utility locating service in addition to contacting the underground utilities location center (Call Before You Dig). Prior to field activities, AMEC will complete the following activities.

- Prepare a site-specific Health and Safety Plan (HASP) (Attachment A1).
- 2. Mark the proposed boring and monitoring well locations.
- 3. Acquire appropriate permits for drilling and installing monitoring wells.

5.1 Field Health and Safety Procedures

Field personnel will adhere to the health and safety procedures detailed in the *Site-Specific Health and Safety Plan*. Potential hazards that may be encountered include heat stress, slips, trips, falls, and exposure to insects.

The hospital closest to the Site is Providence Hospital. An emergency contact list and a map illustrating the emergency route to Providence Hospital is located in the *Health and Safety Plan*.

It is anticipated that all fieldwork will be performed using Level D modified personal protective equipment (PPE), which includes safety glasses, steel-toed boots, and nitrile and/or leather gloves. At a minimum, each on-Site worker will be required to wear safety footwear (steel-toed boots), hard hat, hearing protection, eye protection, and a high visibility safety vest. PPE will be upgraded whenever there is a potential for direct contact with contaminated soil or groundwater. Changes in the required PPE will be based on changed work conditions and field observations. PPE upgrades may consist of the following:

- Nitrile gloves (surgical-type);
- Tyvek Coveralls if a splash transfer is considered likely;
- Additional PPE upgrades that may be required, depending on breathing zone levels of petroleum hydrocarbons detected.

Eating, drinking, chewing gum or tobacco, smoking, or any practice that involves hand-to mouth contact increases the probability of contaminant ingestion and is prohibited in any area where the possibility of contamination exists.

Potential physical hazards that may be encountered include heat stress, slips, trips, and falls.

The AMEC field team will have current certifications for first aid, and a cell phone will be available at all times while personnel are in the field. All emergency response services will be reached by calling 911, from a land line if available.

6.0 FIELD PROCEDURES

This section presents the field investigation procedures for the soil and groundwater sampling effort. The field investigation will consist of drilling soil borings, installing monitoring wells, and collecting soil and groundwater samples. The proposed soil boring and monitoring well locations are illustrated on Figure 1. The proposed soil boring locations are listed in Table 3.

6.1 Utility Survey

AMEC will identify all aboveground and overhead power lines. Proposed boring locations that are within 25 feet of an overhead power line will be moved until clearance is achieved. AMEC will also oversee a geophysical survey conducted by a private utility locator to identify subsurface utilities within 25 feet of the proposed soil boring locations. The presence of belowgrade utilities will be identified, and their inferred locations will be marked on the ground surface at the site. In addition, subsurface activity locations may be reviewed with the owner or the representative of the owner, if available at the time.

6.2 Calibration of Field Equipment

Field instrument calibration will occur daily at the beginning of field activities. Calibration results and times will be recorded in the field notes. Field equipment requiring calibration includes the photoionization detector (PID) and the Horiba U-22 (or equivalent) water quality meter.

Calibration instructions for the PID and water quality meter are included with the equipment manuals enclosed in the equipment cases. In general, the PID will be used to screen soil for the presence of lighter end petroleum hydrocarbons, such as gasoline and benzene. A Horiba U-22 water quality meter will be used to measure water quality parameters, such as dissolved oxygen, temperature, oxidation-reduction potential, and turbidity. The Horiba U-22 (or equivalent) will be calibrated daily in accordance with the manufacturer's instructions. A record of the daily calibration will be entered in the field log book.

6.3 Soil Borings

Proposed soil borings are listed in Table 3. Seven shallow soil borings (AP-1 through AP-7) will be advanced to a maximum depth of 15 feet bgs using direct-push technology drilling. These borings will be advanced in the vicinity of MW-29 and the former ADC Garage and Shop. Soil samples will be collected continuously from the surface to the total maximum depth of the borings. A soil sample will be collected at the soil/groundwater interface in each soil boring location. An additional sample will be collected based on odor, staining, PID readings, or sheen. If no soil samples exhibit any of these characteristics, the soil sample will be collected from the bottom of the boring to delineate the vertical extent of contamination.

Seven deep soil borings (AB-1 through AB-6 and MW-A7) will be advanced around the western and northern perimeter of the Property to a maximum depth of 35 feet bgs to determine the lithologic conditions underlying that portion of the Site. The borings will be completed at a depth of 35 feet bgs since any proposed slurry wall can be completed as a hanging wall if there is no silt confining layer to key the wall into. The borings will be advanced using a hollow-stem auger (HSA) rig. A soil sample will be collected at the soil/groundwater interface in each soil boring location. An additional sample will be collected based on odor, staining, PID readings, or sheen. If no soil samples exhibit any of these characteristics, the soil sample will be collected from the bottom of the boring to delineate the vertical extent of contamination.

Four soil borings (MW-A3, MW-A4, MW-A5, and MW-A6) will be advanced on the Port of Everett property and will be completed as shallow monitoring wells using a direct-push drill rig equipped with HSA. The wells will be used to determine the western extent of the dissolved plume. A deep soil boring (MW-A7) drilled to a depth of 35 feet will be backfilled to a depth such that MW-A7 will be installed as a shallow monitoring well which straddles the water table.

6.4 Soil Sample Collection

Soil samples will be collected from the proposed soil boring and proposed monitoring well locations shown on Figure 1. All soil boring and monitoring well locations are subject to change based on observed conditions in the field (aboveground and belowground utilities, existing equipment, etc.).

Soil samples from the proposed push-probe soil borings/monitoring wells will be collected continuously using a 4-foot stainless steel sampler with a disposable liner.

Soil samples from the five proposed deep soil borings will be collected continuously for lithologic characterization. AMEC will inspect all soil samples and screen the soil samples for volatile organic compounds (VOCs) using a PID.

Each soil sample will be examined and relevant sample information (e.g., depth of sample collection, date and time of sample acquisition, PID measurement, etc.) will be recorded. To prevent cross contamination, any equipment repeatedly in contact with the soil will be decontaminated before and after each individual sampling attempt.

AMEC will select at least two soil samples per soil boring for laboratory analyses. The sample will be selected at the discretion of AMEC on the basis of field observations including a sheen test. A soil sample will be collected for analysis at the soil/groundwater interface in each soil boring location. An additional sample will be collected based on odor, staining, PID readings or sheen. If no soil samples exhibit any of these characteristics, the soil sample will be collected from the bottom of the boring to delineate the vertical extent of contamination.

Samples will be selected from intervals exhibiting petroleum staining and/or elevated PID measurements, the capillary fringe, and/or within an artificial fill unit.

6.5 Sample Containers, Preservation and Storage

Soil and groundwater samples will be collected and placed into precleaned sample containers provided by the analytical laboratory in accordance with Table 4. Upon collection, sample containers will be sealed, labeled, chilled to 4°C in a cooler with ice, and maintained with AMEC's custody until delivery to the project analytical laboratory, Test America, Inc., in Tacoma, Washington.

6.6 Sample Labeling

Each sample container sent to the lab will have a unique sample identification label.

The following information will be included on the sample label:

- Project name and location;
- Project number;
- Sample identification number including sample collection depth;
- Sample depth;
- Date and time of collection;
- Analyses to be performed; and
- Initials of the sampler.

Each soil sample will be assigned a unique alphanumeric code that will be used to identify the source of the sample location. Soil samples will be identified by a label indicating the boring or

monitoring well number followed by a dash followed by the depth (feet) below the ground surface that the sample was collected.

6.7 Soil Sample Analyses

Selected soil samples will be submitted to the laboratory for the area-specific chemical analysis. The laboratory analysis will include one or more of the following:

- Total Petroleum Hydrocarbons as Gasoline (TPH-G) by Ecology Method Northwest Total Petroleum Hydrocarbon–Gasoline (NWTPH-G);
- TPH as Diesel and Oil (TPH-D and TPH-O) by Ecology Method NWTPH-Diesel Extended (NWTPH-Dx); TPH-Dx detections with chromatograms that will be run with a silica gel cleanup to remove any biogenic interference (typically from decaying plant matter);
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX) and methyl tertiary butyl ether (MTBE) by U.S. Environmental Protection Agency (EPA) Method 8260B;
- Low-level polycyclic aromatic hydrocarbons (PAHs) by EPA method 8270D SIM;
- 1,2-Dichloroethane (EDC), ethylene dibromide (EDB), and n-hexane in select soil samples that exhibit contamination based on field screening;
- Extractable Petroleum Hydrocarbons (EPH) by Method NW-EPH;
- Volatile Petroleum Hydrocarbons (VPH) by Method NW-VPH.

Soil samples for TPH-G, VOC, and EPH/VPH analyses will be collected using a plastic syringe and placed into laboratory-supplied, preweighed volatile organic analyte vials in accordance with EPA soil sampling method 5035A. Soil samples for all other analyses will be placed in laboratory-supplied glass sample jars and securely fitted with Teflon-lined plastic lids. Particles greater than 2 centimeters in diameter will be removed from the samples and discarded with the drilling cuttings.

EPH and VPH analysis will be requested for soil samples with the highest concentrations of petroleum hydrocarbons and benzene.

Soil sample methods, required sample containers, preservation requirements, and holding times are provided in Table 4.

6.8 Soil Geotechnical Analyses

Two soil samples collected from the saturated zone of the perimeter borings will be analyzed for the following: total organic carbon, soil bulk density, porosity, volumetric water content, and permeability (Shelby tube). Samples of drill cuttings will be retained from each boring for use in slurry wall mix design, if necessary. Two 5-gallon buckets of drill cuttings from the 5- to 15-foot depth interval will be collected from each boring location. Shelby tube samples will be collected from fine-grained materials as undisturbed samples. The Shelby tube sampler will be pushed

into undisturbed soil following retrieval of a split-spoon sample that indicates that a fine-grained formation has been encountered. Data from this testing will be used to assist in the development of remedial alternatives. Geotechnical analytical methods are listed in Table 5.

6.9 Monitoring Well Installation and Development

One deep and four shallow monitoring wells (MW-A3, MW-A4, MW-A5, MW-A6, and MW-A7) will be installed using an HSA drill rig and equipment. Soil borings for the monitoring wells will be advanced using 8-inch inside diameter augers. Soil samples to be collected from the monitoring well borings are listed in Table 3. The monitoring wells will be installed in accordance with Washington Administrative Code (WAC) 173-160 Minimum Standards for Construction and Maintenance of Wells.

Each of the monitoring wells will be constructed using 2-inch-diameter, flush-threaded Schedule 40 polyvinyl chloride (PVC) with a 10-foot-long prepack slotted screen with 0.010-inch slots and a 12/20 Colorado silica sand (CSS) pack. A prepack screen is proposed in order to minimize turbidity that has been observed at other monitoring wells in the Site vicinity. The prepack screens also allow rapid construction, since the soil in the area has been observed to heave. The well screens will be installed to straddle the water table. Additional sand (10/20 CSS) will be placed in the annular space surrounding the prepack screens. The sand pack will extend to a height of at least 1 foot above the top of the screen. Placement of the well screen will be determined in the field based on drilling conditions. The wells will be completed with a grout seal to the ground surface. The surface completion will conform to State of Washington standards and will be an 8-inch-diameter, flush-mounted, traffic-rated well monument.

All monitoring wells will be fitted with water-tight locking well caps and locks that are keyed alike.

Following well installation, the monitoring wells will be developed by surging with a surge block, followed by removing water by pumping until the water is clear and free of suspended solids. A minimum of six well volumes will be removed from each newly installed monitoring well. If the well purges dry, well development will resume when the water in the well recharges to 80 percent of the original recorded volume. Well development will cease upon stabilization of temperature, pH, and specific conductivity and turbidity measurements and the removal of six well volumes or two cycles of purging dry, whichever occurs first. AMEC will record the volume of water removed and water quality parameters during well development. An objective of the well development will be to obtain a turbidity value of 5 nephelometric turbidity units (NTU) or as low as is practically possible. The monitoring well development water will be contained in 55-gallon drums and stored at the Property.

6.10 Surveying of Monitoring Wells

The horizontal locations and the elevations of the tops of inner and outer casings of the newly installed monitoring wells will be surveyed by a Washington licensed surveyor. Elevations will be established to the nearest 0.01 foot; locations to the nearest 0.1 foot. The monitoring wells will be surveyed to tie into the existing monitoring well network. Both horizontal and vertical controls

used for the new well survey will be consistent with horizontal and vertical controls used previously for surveying monitoring wells

6.11 Groundwater Level Measurements

Groundwater surface elevations will be used to make an initial assessment of the groundwater potentiometric surface, surface gradient, and direction of groundwater flow. During each groundwater sampling event, two groundwater elevation surveys will be conducted. One survey will be conducted during the high tidal stage, and one survey will be conducted during the low tidal stage.

The groundwater elevation will be measured with a decontaminated electronic water level meter or oil/water interface probe with an accuracy of plus or minus 0.01 feet. The groundwater elevation measurement will be made from a reference point on the top of the PVC well casing (to be surveyed and marked by land surveyors).

The water level probe will be decontaminated between each use, and wells with known or suspected contamination will be measured last.

6.12 Groundwater Sample Collection

Groundwater samples will be collected from the newly installed monitoring wells after a minimum of 7 days following development. Existing monitoring wells that do not have a history of containing liquid petroleum hydrocarbons (LPH) will also be sampled. Existing monitoring wells (MW-11, MW 19, MW40R, MW-A1 and MW-A2) and newly installed monitoring wells (MW-A3 through MW-A7) will be sampled using low-flow groundwater sampling techniques (Puls and Barcelona 1996). The groundwater sampling procedure will consist of the following steps.

- 1. Open well cap and allow well to equilibrate for several minutes.
- 2. Place an interface probe into the well to determine if LPH is present and measure thickness, if present. The well will not be sampled if LPH is present.
- Measure depth to water from established top of casing measuring point and record on groundwater sampling field data sheet. Determine the middle depth of the water column that is within the screened interval.
- 4. Using dedicated (cutter used only for this purpose and kept in a plastic bag) tubing cutter, cut a length of new, low-density polyethylene tubing to extend to the middle depth of the water column in the well. Connect the end of the tubing to peristaltic pump using dedicated silicone or MasterflexTM tubing.
- 5. Connect additional tubing to pump discharge line and flow-through cell. Establish flow rate of less than 200 milliliters/minute.

- 6. Record readings every 3 to 5 minutes with Horiba U-22 or equivalent water quality meter of the following parameters: temperature, pH, specific conductance, dissolved oxygen, oxidation-reduction potential, and turbidity.
- 7. Also record every 3 to 5 minute measurements of flow rate and depth to water. If drawdown in well exceeds 0.30 feet, reduce flow rate.
- 8. Stabilization of water quality parameters is assumed when measured parameters are within the following ranges:
 - ± 10 percent pH (standard units)
 - ± 3 percent electrical conductivity (milli-Siemens per centimeter [mS/cm])
 - ± 10 percent oxidation-reduction potential (millivolt [mV])
 - ± 10 percent turbidity (Nephelometric Turbidity Units [NTUs])
 - ± 10 percent dissolved oxygen (milligram per liter [mg/L])
 - ± 10 percent temperature (degrees Centigrade)
- 9. After stabilization of water quality parameters is achieved, disconnect tubing from flow-through cell and begin sample collection directly from pump discharge tubing.
- 10. Reduce flow rate to minimal possible flow for collection of volatile organic compound fraction.

6.13 Groundwater Sample Analyses

Increased turbidity in groundwater samples is attributed to soil lithological characteristics, increased organic content and/or improper purging and sampling rates during groundwater sample collection. High concentrations of total metals such as lead occurring in groundwater samples is most likely due to increased organic content in the formation being sampled.

Select groundwater samples will be submitted to the laboratory for the area-specific chemical analysis. The laboratory analysis will include one or more of the following:

- TPH using Ecology methods NWTPH-G and NWTPH-Dx;
- BTEX and MTBE by U.S. EPA Method 8260B;
- EDC, EDB, and n-hexane by U.S. EPA 8260B Selected groundwater samples;
- Low-level PAHs by EPA method 8270D SIM;
- Dissolved lead by EPA Method 6020;
- Natural attenuation parameters (see Table 6).

6.14 Equipment Decontamination

Decontamination of sampling equipment will be performed to maintain data quality, to prevent cross contamination, and to prevent the potential introduction of contaminants into previously unimpacted areas. Reusable sampling equipment, including the drill rig, down-hole drilling equipment, and stainless-steel materials, will be decontaminated prior to each sampling event. General decontamination procedures for nondedicated soil sampling equipment and accessories are as follows.

- Physically remove soils using a nonphosphate detergent solution.
- Rinse with noncontaminated tap water.
- Rinse with deionized water.
- Rinse with Isopropyl alcohol.
- Air dry.

6.15 Investigation Derived Waste Management

Investigation Derived Waste (IDW) generated during the course of the field investigation will be labeled and securely stored on the Property in 55-gallon drums approved by the U.S. Department of Transportation. Drums will be stored at a designated location. The various waste streams will include the following:

- Potentially contaminated liquids, including fluids derived from purging, development of monitoring wells, and equipment decontamination water; and
- Potentially contaminated solids, principally soil cuttings

Each drum will be labeled with standardized IDW drum labels to indicate its contents, date of collection, location from which the IDW originated, and other pertinent information. In addition, all drums will also be labeled with indelible paint sticks or pens. AMEC will maintain an inventory of the drums. On completion of the project, the IDW will be disposed of at an appropriate off-site facility, following a review of the investigation analytical data.

6.16 Aquifer Testing

Aquifer testing will be performed to determine the horizontal hydraulic conductivity of water bearing materials at the Site. The hydraulic conductivity (K) is an important hydraulic parameter for estimating groundwater flow rates and other aquifer characteristics. Slug testing will be performed to estimate K using monitoring wells MW-A5 and MW-A6, which are located west of the site.

A slug test involves the instantaneous injection or withdrawal of a volume or slug of water or solid cylinder of known volume. This is accomplished by displacing a known volume of water from a well and measuring the artificial fluctuation of the groundwater level in the well. Water

level changes are usually measured with pressure transducers and recorded by an electronic data logger.

The following equipment will be used to perform the slug test:

- Tape measure (subdivided into tenths of feet)
- Pressure transducer and data logger
- Electronic water level indicator
- Stainless steel or copper slug of known volume
- Dedicated nylon twine for each well to be tested
- Watch or stopwatch with second hand
- Waterproof logbook and pen
- Laptop computer with data logger software preinstalled prior to field event;
- Supplies for decontaminating slug, including alconox soap, scrub brush, deionized water, and tap water

The following procedure will be used for slug testing each monitoring well.

- 1. Open the monitoring well and allow several minutes for the well to equilibrate to atmospheric pressure.
- 2. Measure and record static water level in well. Be sure to allow time for equilibration with atmospheric pressure for wells with unvented caps. If a dedicated bailer or other sampling apparatus in place interferes with initial reading, minimize disturbance as much as possible, and allow time for re-equilibration. Wait and repeat measurement to confirm the well is at steady state.
- 3. Remove any equipment in the well that would interfere with placing the transducer or conducting the slug test.
- 4. Measure and record the total depth of the well to verify the well depth and verify that the well screen has not been partly silted in. Sediment in the well screen can affect the slug test results.
- 5. Place pressure transducer in well to appropriate depth (see depth limits for individual transducers, or manufacturers specifications). Use measuring tape to determine point on cable to set in well. Do not place transducer so that its range will be exceeded, or so that the transducer cable interferes with movement of the slug.
- 6. Place slug in well, above the transducer. If desired, a falling head test can be run at this point. It is often found in highly permeable materials, however, that the time required for the slug to fall through the water column may be comparable to the recovery time, and these data may therefore not be usable.

- 7. When the water level has returned to static height, initialize the data logger.
- 8. Remove the slug. Use auto-start feature if available, or start data logger by hand.
- Test may be terminated after recovery is complete, or after 10 to 15 minutes for wells with slow recovery. If possible, screen data in the field to ensure data quality prior to demobilization.
- 10. Plot data using laptop computer to assure slug test is representative. If data are ambiguous or insufficient, repeat test.

The slug test data will be analyzed using the Bouwer and Rice method (Bouwer 1976, 1989a, 1989b) to obtain estimates of K for each monitoring well tested.

6.17 Tidal Study

A tidal influence study will be conducted to determine if groundwater beneath the Site is affected by tides. Permission will be requested from the Port of Everett to install a temporary stilling well on their dock. The stilling well will be in position for the duration of the Tidal Study at the Site.

Pressure transducers and data loggers will be installed in the four new groundwater monitoring wells on the Port of Everett property (MW-A3, MW-A4, MW-A5, MW-6) and in existing monitoring wells MW-A1, MW-A2, W-3, MW-11, W-17, W-18 MW-19, MW-28, and MW-40R to record groundwater levels in the zone that is potentially tidally influenced. Specifications of the wells are provided in Table 7. The wells were selected to provide upgradient, on-Site/middle of the site, and downgradient information and are also wells that do not have measured concentrations of free product that would clog the transducers. Monitoring well MW-40R may contain LPH and, if so, will not be used in the tidal influence study.

Elevation measurements will be recorded automatically every 6 minutes for a minimum period of 76 hours. Tidal measurements recorded at the stilling well, located approximately 540 yards to the west of the Site, will be compared to the transducer data.

The data collected from the automatic transducers will be stored in the data logger and downloaded to a computer at the end of the tidal study data collection period. An hour after installation of the in-well transducer, a computer will be linked up to check that it is accurately recording data. On completion, the downloaded data will be corrected for actual groundwater depth and correlated with data from the stilling well. Tidal time lag and tidal efficiencies will be calculated for each monitoring well location. In addition, the tidal study data will be analyzed to determine the mean hydraulic gradient at the site using the method described by Serfes (1991). The data and the results of the study will be presented in a report to the Washington State Department of Ecology, including maps showing the mean hydraulic gradient at low and high tide and data implications with respect to tidal influence.

6.18 Historic or Cultural Resources

Buried cultural artifacts such as chipped or ground stone, historic refuse, buildings foundations, or human bone could be discovered during subsurface activities, although this is highly unlikely. Initial field activities will include the installation of soil borings and monitoring wells which will result in a minimal amount of site disturbance. As such, a professional archaeologist may not be needed on-site during these activities. Cultural Resource review and the need for any on-site archaeologist will be determined by Ecology in communication with the Department of Archaeology and Historic Preservation (DAHP) and the concerned tribal government.

If any excavations (e.g., test pits) are required for the investigation, a separate cultural resources assessment and work plan will be developed in communication with DAHP and the concerned tribal governments pursuant to RCW 27.44 (Indian graves and records) and 27.53 (Archaeological sites and resources) and a professional archaeologist may required to be onsite to oversee the activities.

If any archaeological resources are discovered during field activities, work will be stopped immediately and Ecology, the DAHP, the City of Everett Planning and Community Development Department, and the Tulalip Tribes Cultural Resources Department will be notified by the close of business. A professional archaeologist will arrange an on-site inspection and invite the parties to attend. The professional archaeologist shall document the discovery and provide a professionally documented site form and report to the above listed parties. In the event of an inadvertent discovery of human remains, work will be immediately halted in the discovery area, the remains will be covered and secured against further disturbance, and the Everett Police Department and Snohomish County Medical Examiner will be immediately contacted, along with DAHP and authorized Tribal representatives. A treatment plan by the professional archaeologist shall be developed in consultation with the above listed parties consistent with RCW 27.44 and RCW 27.53 and implemented according to WAC 25-48.

7.0 DOCUMENTATION

The integrity of data obtained from samples collected during the field investigation depends on proper sample management and handling. Proper sample management includes sample labeling, which includes assignment of a specific identification number and affixing proper identification and markings to the collected samples. Proper handling includes proper packing and transport of the sample containers.

7.1 Field Logbook

The field logbook serves as the primary record of field activities. Entries shall be made chronologically and in sufficient detail to allow the writer or a knowledgeable reviewer to reconstruct the applicable events. The field logbook shall be bound with consecutively numbered and water repellent pages.

At a minimum, the following information will be recorded in either the field logbook or a separate sample log sheet during the collection of each sample:

- Sample location and description;
- Sampler's name(s);
- Date and time of sample collection;
- Type of sample (soil, groundwater, or surface water);
- Type of sampling equipment used;
- Field instrument readings and calibration; and
- Field observations and details related to analysis or integrity of samples (e.g., weather conditions, noticeable odors, colors, etc.).

7.2 Labeling

Each sample container sent to the lab will have a unique sample identification label. The following information will be included on the sample label:

- Project name and location;
- Project number;
- · Sample identification number;
- Date and time of collection; and
- Initials of the sampler.

Each soil sample will be named by the location and depth of sample collection in feet. For example, a soil sample collected from soil boring A-1 at a depth of 2 feet will have a sample designation as "A-1-2." Groundwater samples will be named by the monitoring well location and the date of sample collection. For example, a groundwater sample collected from MW-A2 on October 8, 2009, would be named "XOMADC-100809-MWA2."

Duplicate samples will be sent to the laboratory blindly. However, the location of the sample will not be revealed to the laboratory. Instead, duplicate samples will be named sequentially as Dup-1 and Dup-2. The location of the duplicate sample collection will be recorded in the field notebook.

7.3 Sample Chain of Custody

COC forms will be completed at the end of each sampling day. The completed COC form(s) and samples will be kept in the possession of the field team until relinquishing the samples to the laboratory or courier service. One copy of the completed COC form will be kept by the field team, and the original COC form will be stored in a resealable plastic bag and transported in the sample container with the laboratory samples. Custody seals will be placed along the seal of each sample container in order to prevent tampering with the samples. A copy of the COC form is included in Attachment A2.

8.0 DATA VALIDATION

Data validation is the procedure of reviewing data against a known set of criteria to verify data validity prior to its use. Data validation procedures have been developed by the US EPA to standardize the validation process for analytical results for both water-quality and soil-quality investigations and are documented as the *US EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review,* US EPA, Office of Solid Waste and Emergency Response, Washington, D.C., Publication 9240.1-48, US EPA-540/R-08-01 (US EPA 2008). The Functional Guidelines are intended to be used as a guide for evaluation of data generated under statements of work for organic and inorganic analyses associated with the US EPA Contract Laboratory Program (CLP). The Functional Guidelines also provide general data validation guidelines that can be applied to data generated by non-CLP analytical methods.

One hundred percent (100%) of the analytical data for soil and groundwater investigation samples will be validated using EPA Stage 4 data validation level. Stage 4 validation includes an examination of sample and QC raw data and instrument printouts to check for technical, calculation, analyte identification, analyte quantitation, and transcription or reduction errors. At a minimum 10% of reported results on summary forms should be confirmed by recalculation. The data validation staff will review field documents and laboratory data report packages, and if needed, apply data qualifiers to the data. The data reviewer will determine if the project data quality objectives have been met, and will calculate the data completeness for the project.

9.0 QUALITY CONTROL

This SAP has been prepared to provide instructions and guidance to ensure the sample chemical data collected in support of the site soil and groundwater sampling activities are scientifically valid. Indicator hazardous substances at the Site are listed in Table 2. The sections below outline methods and processes to meet these objectives.

9.1 Field Quality Control Samples

To evaluate quality control (QC), two types of QC samples will be collected (trip blank and blind field duplicate). One trip blank will be collected daily and the field duplicate samples will be collected at a frequency of 5 percent of the samples for each matrix (soil and groundwater).

Two trip blank vials provided by the laboratory will be placed into the cooler designated to store samples to be analyzed for VOCs to evaluate the potential for cross-contamination. The trip blanks will be analyzed for TPH using method NWTPH-Gx and for BTEX and MTBE using EPA Method 8260B. Field duplicates are replicate samples collected at the same location during the same sampling session (roughly at the same time). The field duplicate samples will be collected in the same container types and handled and analyzed in the same manner, as all other soil and groundwater samples. The field duplicates will be analyzed for the same analytes as the primary sample.

9.2 Laboratory Quality Control Samples

Laboratory QC samples are analyzed as part of standard laboratory practice. The laboratory monitors the precision and accuracy of the results of its analytical procedures through analysis of QC samples. In part, laboratory QC samples consist of Matrix Spike/Matrix Spike Duplicate (MS/MSD) samples for organic analyses, and MS/MSD for inorganic analyses. The term "matrix" refers to use of the actual media collected in the field (e.g., routine soil and water samples). Laboratory QC samples are an aliquot (subset) of the field sample. They are not separate samples, but a special designation of an existing sample. The laboratory QC samples will be analyzed for the same analytes as the standard samples.

9.3 Field Variances

As conditions in the field may vary, it may become necessary to implement minor modifications to the sampling as presented in this plan. When appropriate, ExxonMobil, ADC, and Ecology will be notified and a verbal (followed by a written verification) approval will be obtained before implementing the changes. Modifications to the approved plan will be documented in the sampling project report.

9.4 Data Management

Data management will commence during the field investigation. Each soil and groundwater sample collected will be recorded on field logs, which will include a description of the location, depth, matrix, sample ID, and date and time of collection. All data submittals will be consistent with Ecology Policy 840 (dated March 31, 2008) Environmental Information Management (EIM) submittal requirement format. Once data have been provided by the laboratory, the electronic deliverables will be reviewed to ensure the receipt of all requested analytes and again cross-checked with COCs.

10.0 REFERENCES

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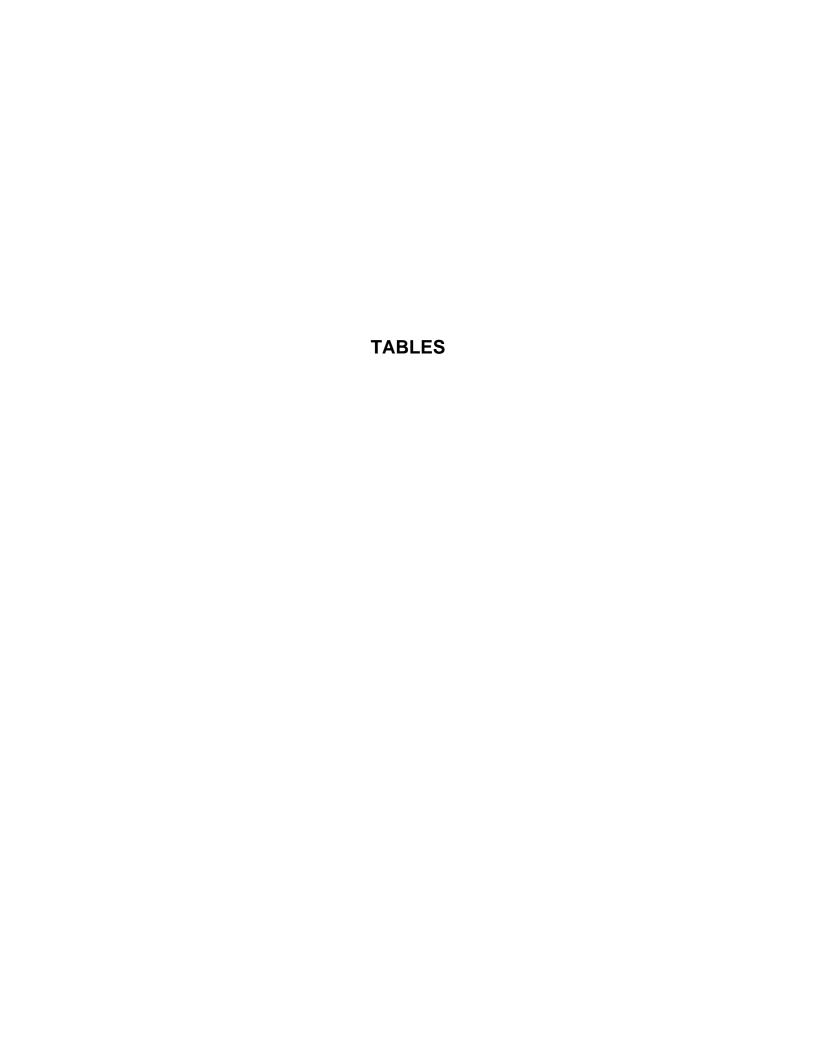


Table 1 Data Quality Objectives

					Surrogate	Duplicate	Matri	x Spike	Blan	k Spike	
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS#
				SOIL							
NWTPH-Gx											
NWTPH-Gx	Gasoline Range Hydrocarbons	0.5	5.00	mg/kg dry wt	-	50	10-145	50	80-120	50	8006-61-9
NWTPH-Gx	a,a,a-Trifluorotoluene			Surrogate	50-150	-	-	-	-	-	98-08-8
NWTPH-Dx (w/o	Acid/Silica Gel Clean-up)										
NWTPH-Dx	Diesel Range Hydrocarbons	2.00	4.00	mg/kg dry wt	-	48	10-154	48	55-123	48	68476-34-6
NWTPH-Dx	Lube Oil Range Hydrocarbons	2.00	4.00	mg/kg dry wt	-	39	19-146	39	57-128	39	NA
NWTPH-Dx	o-Terphenyl			Surrogate	50-150	-	-	-	-	-	84-15-1
Extractable Petr	oleum Hydrocarbons										
WA MTCA-EPH	C8-C10 Aliphatics	1.90	5.00	mg/kg dry wt	-	25	50-150	25	50-150	25	NA
WA MTCA-EPH	C10-C12 Aliphatics	1.00	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C12-C16 Aliphatics	1.40	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C16-C21 Aliphatics	2.00	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C21-C34 Aliphatics	3.20	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C8-C10 Aromatics	2.50	5.00	mg/kg dry wt	-	25	50-150	25	50-150	25	NA
WA MTCA-EPH	C10-C12 Aromatics	0.60	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C12-C16 Aromatics	1.70	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C16-C21 Aromatics	3.10	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C21-C34 Aromatics	4.40	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C-35			Surrogate	60-140	-	-	-	-	-	94-36-0
WA MTCA-EPH	o-Terphenyl			Surrogate	60-140	-	-	-	-	-	84-15-1
WA MTCA-EPH	2-Fluorobiphenyl			Surrogate	60-140	-	-	-	-	-	321-60-8
WA MTCA-EPH	2-Bromonaphthalene			Surrogate	60-140	-	-	-	-	-	580-13-2
WA MTCA-EPH	1-Chlorooctadecane			Surrogate	60-140	-	-	-	-	-	3386-33-2
Volatile Petroleu	ım Hydrocarbons		· •	-	-		•				•
WA MTCA-VPH	C5-C6 Aliphatics	2.00	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C6-C8 Aliphatics	0.90	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C8-C10 Aliphatics	2.25	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C10-C12 Aliphatics	3.65	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C8-C10 Aromatics	2.40	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C10-C12 Aromatics	0.30	5.00	mg/kg dry wt		25	70-130	25	70-130	25	NA
WA MTCA-VPH	C12-C13 Aromatics	0.50	5.00	mg/kg dry wt	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	2,5-Dibromotoluene (FID)			Surrogate	70-130			-	-	-	615-59-8
WA MTCA-VPH	2,5-Dibromotoluene (PID)			Surrogate	70-130	_		-	-	-	615-59-8

Table 1 Data Quality Objectives

					Surrogate	Duplicate	Matrix	x Spike	Blan	k Spike	
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS#
				SOIL (conti	nued)						
Volatile Organic	Compounds (Selected List)			•	•						
EPA 8260B	Benzene	0.67	2.00	μg/kg dry wt	-	50	42-141	50	78-126	50	71-43-2
EPA 8260B	1,2-Dibromethane (EDB)	0.52	2.00	μg/kg dry wt	-	45	30-155	45	30-155	45	106-93-4
EPA 8260B	1,2-Dichloroethane (EDC)	0.67	2.00	μg/kg dry wt	-	50	32-155	50	70-139	50	107-06-2
EPA 8260B	Ethylbenzene	0.67	2.00	μg/kg dry wt	-	50	21-165	50	79-130	50	100-41-4
EPA 8260B	n-Hexane	0.45	10.000	μg/kg dry wt	-	48	10-180	48	55-136	48	110-54-3
EPA 8260B	Toluene	0.400	2.00	μg/kg dry wt	-	50	45-145	50	76-126	50	108-88-3
EPA 8260B	Total Xylenes	1.30	5.00	μg/kg dry wt	-	50	31-159	50	80-130	50	1330-20-7
Polynuclear Aro	matic Hydrocarbons by GC/MS	S-SIM									
EPA 8270C-SIM	Acenaphthene	0.0003	0.00333	mg/kg dry wt	-	32	42-120	32	44-120	40	83-32-9
EPA 8270C-SIM	Acenaphthylene	0.0004	0.00333	mg/kg dry wt	-	34	39-127	34	46-127	34	208-96-8
EPA 8270C-SIM	Anthracene	0.0007	0.00333	mg/kg dry wt	-	31	39-139	31	49-139	40	120-12-7
EPA 8270C-SIM	Benzo(a)anthracene	0.0003	0.00333	mg/kg dry wt	-	43	31-132	43	53-132	43	56-55-3
EPA 8270C-SIM	Benzo(a)pyrene	0.0004	0.00333	mg/kg dry wt	-	41	22-125	41	57-125	41	50-32-8
EPA 8270C-SIM	Benzo(b)fluoranthene	0.0016	0.00333	mg/kg dry wt	-	50	10-147	50	36-140	50	205-99-2
EPA 8270C-SIM	Benzo(k)fluoranthene	0.0003	0.00333	mg/kg dry wt	-	38	23-140	38	49-140	38	207-08-9
EPA 8270C-SIM	Benzo(ghi)perylene	0.0003	0.00333	mg/kg dry wt	-	50	10-151	50	54-139	50	191-24-2
EPA 8270C-SIM	Chrysene	0.0006	0.00333	mg/kg dry wt	-	40	20-139	40	47-139	40	218-01-9
EPA 8270C-SIM	Dibenz(a,h)anthracene	0.0004	0.00333	mg/kg dry wt	-	50	18-150	50	58-141	50	53-70-3
EPA 8270C-SIM	Fluoranthene	0.0004	0.00333	mg/kg dry wt	-	47	29-135	47	34-135	47	206-44-0
EPA 8270C-SIM	Fluorene	0.0005	0.00333	mg/kg dry wt	-	38	38-129	38	47-129	38	86-73-7
EPA 8270C-SIM	Indeno(1,2,3-cd)pyrene	0.0003	0.00333	mg/kg dry wt	-	46	13-146	46	53-142	46	193-39-5
EPA 8270C-SIM	1-Methylnaphthalene	0.0004	0.00333	mg/kg dry wt	-	35	20-120	35	41-120	35	90-12-0
EPA 8270C-SIM	2-Methylnaphthalene	0.0004	0.00333	mg/kg dry wt	-	38	28-124	38	48-121	38	91-57-6
EPA 8270C-SIM	Naphthalene	0.0007	0.00333	mg/kg dry wt	-	36	10-135	36	42-120	36	91-20-3
EPA 8270C-SIM	Phenanthrene	0.0004	0.00333	mg/kg dry wt	-	46	33-134	46	52-134	46	85-01-8
EPA 8270C-SIM	Pyrene	0.0003	0.00333	mg/kg dry wt	-	50	26-153	50	56-144	50	129-00-0
EPA 8270C-SIM	Nitrobenzene-d5			Surrogate	17-120						4165-60-0
EPA 8270C-SIM	2-Flourobiphenyl			Surrogate	14-120						321-60-8
EPA 8270C-SIM	p-Terphenyl-d14			Surrogate	18-120	-	-	-	-	-	1718-51-0
				GROUNDW	ATER						
NWTPH-Gx											
NWTPH-Gx	Gasoline Range Hydrocarbons	40.0	100.0	μg/L	-	37	58-139	37	65-129	37	8006-61-9
NWTPH-Gx	a,a,a-Trifluorotoluene			Surrogate	50-150	-	-	-	-	-	98-08-8

Table 1 Data Quality Objectives

					Surrogate	Duplicate	Matri	ix Spike	Blan	k Spike	
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS#
			GR	OUNDWATER	(continued)						
NWTPH-Dx (w/o	Acid/Silica Gel Clean-up)										
NWTPH-Dx	Diesel Range Hydrocarbons	28.0	50.0	mg/L	-	41	10-134	41	50-123	41	68476-34-6
NWTPH-Dx	Lube Oil Range Hydrocarbons	28.0	50.0	mg/L	-	32	18-147	32	49-117	32	NA
NWTPH-Dx	o-Terphenyl			Surrogate	27-150	-	-	-	-	-	84-15-1
Extractable Petro	oleum Hydrocarbons										
	C8-C10 Aliphatics	3.0	20.0	μg/L	-	25	50-150	25	50-150	25	NA
WA MTCA-EPH	C10-C12 Aliphatics	2.0	10.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C12-C16 Aliphatics	9.0	30.0	μg/L	-	25	70-130	25	70-130	25	NA
	C16-C21 Aliphatics	12.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C21-C34 Aliphatics	19.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C8-C10 Aromatics	25.0	50.0	μg/L	-	25	50-150	25	50-150	25	NA
WA MTCA-EPH	C10-C12 Aromatics	1.0	10.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C12-C16 Aromatics	3.0	40.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C16-C21 Aromatics	4.0	30.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C21-C34 Aromatics	7.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-EPH	C-35			Surrogate	60-140						94-36-0
WA MTCA-EPH	o-Terphenyl			Surrogate	60-140	-	-	-	-	-	84-15-1
WA MTCA-EPH	2-Fluorobiphenyl			Surrogate	60-140						321-60-8
WA MTCA-EPH	2-Bromonaphthalene			Surrogate	60-140						580-13-2
WA MTCA-EPH	1-Chlorooctadecane			Surrogate	60-140	-	-	-	-	-	3386-33-2
Volatile Petroleu	m Hydrocarbons										
WA MTCA-VPH	C5-C6 Aliphatics	1.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C6-C8 Aliphatics	1.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C8-C10 Aliphatics	3.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C10-C12 Aliphatics	0.90	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C8-C10 Aromatics	2.0	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	C10-C12 Aromatics	0.30	50.0	μg/L		25	70-130	25	70-130	25	NA
WA MTCA-VPH	C12-C13 Aromatics	0.30	50.0	μg/L	-	25	70-130	25	70-130	25	NA
WA MTCA-VPH	2,5-Dibromotoluene (FID)			Surrogate	70-130	-	-	-	-	-	615-59-8
WA MTCA-VPH	2,5-Dibromotoluene (PID)			Surrogate	70-130	-	-	-	-	-	615-59-8

Data Quality Objectives Table 1

					Surrogate	Duplicate	Matr	ix Spike	Blar	ık Spike	
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS#
			GR	OUNDWATER	(continued)						
Volatile Organic	Compounds(Selected List)										
EPA 8260B	Benzene	0.410	1.0	μg/L	-	25	70-130	25	70-130	25	71-43-2
EPA 8260B	1,2-Dibromethane (EDB)	0.460	1.0	μg/L	-	10	70-152	10	80-135	10	106-93-4
EPA 8260B	1,2-Dichloroethane (EDC)	0.350	1.0	μg/L	-	25	72-137	25	70-134	25	107-06-2
EPA 8260B	Ethylbenzene	0.350	1.0	μg/L	-	25	70-130	25	70-130	25	100-41-4
EPA 8260B	n-Hexane	0.230	2.0	μg/L	-	13	39-167	13	70-130	13	110-54-3
EPA 8260B	Toluene	0.350	1.0	μg/L	-	25	70-130	25	70-130	25	108-88-3
EPA 8260B	Total Xylenes	0.730	3.0	μg/L	-	25	70-130	25	70-130	25	1330-20-7
Polynuclear Aro	matic Compounds by GC/MS v	vith High Vo	olume Inje	ction							
EPA 8270C-HVI	Acenaphthene	0.029	0.100	μg/L	-	35	25-140	35	43-122	35	83-32-9
EPA 8270C-HVI	Acenaphthylene	0.031	0.100	μg/L	-	31	36-135	31	43-129	31	208-96-8
EPA 8270C-HVI	Anthracene	0.076	0.100	μg/L	-	38	20-145	38	50-125	38	120-12-7
EPA 8270C-HVI	Benzo(a)anthracene	0.018	0.100	μg/L	-	50	10-129	50	50-135	50	56-55-3
EPA 8270C-HVI	Benzo(a)pyrene	0.014	0.100	μg/L	-	50	10-136	50	46-136	50	50-32-8
EPA 8270C-HVI	Benzo(b)fluoranthene	0.044	0.100	μg/L	-	50	10-147	50	37-147	50	205-99-2
EPA 8270C-HVI	Benzo(k)fluoranthene	0.027	0.100	μg/L	-	50	10-135	50	47-135	50	207-08-9
EPA 8270C-HVI	Benzo(ghi)perylene	0.018	0.100	μg/L	-	50	10-145	50	30-145	50	191-24-2
EPA 8270C-HVI	Chrysene	0.020	0.100	μg/L	-	50	10-138	50	47-138	50	218-01-9
EPA 8270C-HVI	Dibenz(a,h)anthracene	0.018	0.100	μg/L	-	50	10-144	50	36-144	50	53-70-3
EPA 8270C-HVI	Fluoranthene	0.018	0.100	μg/L	-	40	28-143	40	51-139	40	206-44-0
EPA 8270C-HVI	Fluorene	0.035	0.100	μg/L	-	39	28-144	39	47-128	39	86-73-7
EPA 8270C-HVI	Indeno(1,2,3-cd)pyrene	0.023	0.100	μg/L	-	50	10-142	50	32-142	50	193-39-5
EPA 8270C-HVI	1-Methylnaphthalene	0.030	0.100	μg/L	-	27	37-126	27	37-126	27	90-12-0
EPA 8270C-HVI	2-Methylnaphthalene	0.028	0.100	μg/L	-	29	29-127	29	41-121	29	91-57-6
EPA 8270C-HVI	Naphthalene	0.028	0.100	μg/L	-	32	24-120	32	38-120	32	91-20-3
EPA 8270C-HVI	Pentachlorophenol	0.460	1.00	μg/L	-	32	34-163	32	34-147	32	87-86-5
EPA 8270C-HVI	Phenanthrene	0.051	0.100	μg/L	-	47	31-142	47	45-133	47	85-01-8
EPA 8270C-HVI	Pyrene	0.024	0.100	μg/L	-	37	10-158	37	50-146	37	129-00-0
EPA 8270C-HVI	Nitrobenzene-d5			Surrogate	27-120	-	-	-	-	-	4165-60-0
EPA 8270C-HVI	2-Flourobiphenyl			Surrogate	29-120	-	-	-	- 1	-	321-60-8
EPA 8270C-HVI	p-Terphenyl-d14			Surrogate	13-120	-	-	-	-	-	1718-51-0

Table 1 Data Quality Objectives

					Surrogate	Duplicate	Matri	x Spike	Blanl	k Spike	
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS#
			GR	OUNDWATER	(continued)						
Dissolved Metal	s by EPA 6000/7000 Series Me	thods									
EPA 6020 - Diss	Lead; dissolved	0.10	2.00	mg/L	-	20	75-125	20	80-120	20	7439-92-1
Natural Attenua	tion Parameters										
EPA 300.0	Sulfate	0.11	1.00	mg/L	-	20	80-120	20	90-110	20	14808-79-8
EPA 300.0	Nitrate	0.01	0.10	mg/L	-	20	80-120	20	90-110	20	14797-55-8
EPA 6020	Manganese (total; soluble)	0.60	5.00	mg/L	-	20	75-125	20	80-120	20	7439-96-5
RSK-175	Methane	10.0	26.0	μg/L	70-120	33	46-142	33	80-120	33	74-82-8
EPA 310.1	Alkalinity	5.00	10.0	mg/L	-	20	80-120	20	90-110	20	-

CAS = chemical Abstracts Service

FID = flame ionization detector

MDL = method detection limit

 μ g/L = micrograms per liter

μg/kg = microgram per kilograms

mg/kg = milligram per kilograms

mg/L = milligram perliter

MRL = method reporting limit

PID = photoionization detector

%R = percent Recovery

RPD = relative percent difference

VPH = volatile petroleum hydrocarbons

¹Titration method; no method detection limit

Table 2 Indicator Hazardous Substances

					MTCA Me	thod A	MTCA	Method B
Method	Analyte	MDL	MRL	Unit	Unrestricted	Industrial	Carcinogenic	Noncarcinogenic
Petroleum Hydro	ocarbons by NWTPH-Gx and NV	VTPH-Dx i	n Soil					
NWTPH-Gx	Gasoline Range Hydrocarbons	1.40	5.00	mg/kg dry wt	30/100 ¹	30/100 ¹	NR	NR
NWTPH-Dx	Diesel Range Hydrocarbons	2.00	10.0	mg/kg dry wt	2,000	2,000	NR	NR
NWTPH-Dx	Lube Oil Range Hydrocarbons	4.00	25.0	mg/kg dry wt	2,000	2,000	NR	NR
Volatile Organic	Compounds per EPA Method 8	260B in Sc	oil					
EPA 8260B	Benzene	0.0004	0.0015	μg/kg dry wt	0.03	0.03	18	320
EPA 8260B	Toluene	0.0004	0.0015	μg/kg dry wt	7	7	NR	6,400
EPA 8260B	Ethylbenzene	0.0004	0.004	μg/kg dry wt	6	6	NR	800
EPA 8260B	Total Xylenes	0.0015	0.01	μg/kg dry wt				
EPA 8260B	Methyl tert-butyl ether	0.0006	0.001	μg/kg dry wt				
EPA 8260B	1,2-Dichloroethane (EDC)	0.0006	0.00125	μg/kg dry wt	NoD	NoD	11	1,600
EPA 8260B	1,2-Dibromoethane (EDB)	0.0006	0.005	μg/kg dry wt				
EPA 8260B	n-Hexane	0.0008	0.005	μg/kg dry wt				
Polynuclear Aron	matic Hydrocarbons by GC/MS	-SIM in Soi	il					
EPA 8270C-SIM	Acenaphthene	0.00170	0.0100	mg/kg dry wt	NoD	NoD	NR	4,800
EPA 8270C-SIM	Acenaphthylene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	Anthracene	0.00170	0.0100	mg/kg dry wt	NoD	NoD	NR	24,000
EPA 8270C-SIM	Benzo(a)anthracene	0.00170	0.0100	mg/kg dry wt	2	0.1	NR	NR
EPA 8270C-SIM	Benzo(a)pyrene	0.00170	0.0100	mg/kg dry wt	2	0.1	0.14	NR
EPA 8270C-SIM	Benzo(b)fluoranthene	0.00170	0.0100	mg/kg dry wt	2	0.1	Tef	NR
EPA 8270C-SIM	Benzo(k)fluoranthene	0.00170	0.0100	mg/kg dry wt	2	0.1	Tef	NR
EPA 8270C-SIM	Benzo(b & k)fluoranthene	0.00330	0.0200	mg/kg dry wt				
EPA 8270C-SIM	Benzo(ghi)perylene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	Chrysene	0.00170	0.0100	mg/kg dry wt	2	0.1	Tef	NR
EPA 8270C-SIM	Dibenz(a,h)anthracene	0.00170	0.0100	mg/kg dry wt	2	0.1	Tef	NR
EPA 8270C-SIM	Fluoranthene	0.00170	0.0100	mg/kg dry wt	NoD	NoD	NR	3,200
EPA 8270C-SIM	Fluorene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	Indeno(1,2,3-cd)pyrene	0.00170	0.0100	mg/kg dry wt	2	0.1	Tef	NR
EPA 8270C-SIM	1-Methylnaphthalene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	2-Methylnaphthalene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	Naphthalene	0.00170	0.0100		5	5	NR	1,600
EPA 8270C-SIM	Pentachlorophenol	0.0023	0.01	mg/kg dry wt				
EPA 8270C-SIM	Phenanthrene	0.00170	0.0100	mg/kg dry wt				
EPA 8270C-SIM	Pyrene	0.00170	0.0100	mg/kg dry wt	NoD	NoD	NR	24,000

Table 2 Indicator Hazardous Substances

					MTCA Method A	MTCA	Method B
Method	Analyte	MDL	MRL	Unit	Unrestricted	Carcinogenic	Noncarcinogenic
Petroleum Hydro	carbons by NWTPH-Gx and NV	VTPH-Dx ii	n Water				
NWTPH-Gx	Gasoline Range Hydrocarbons	38.0	50.0	μg/L	800/1000 ¹	NR	NR
NWTPH-Dx	Diesel Range Hydrocarbons	2.00	10.0	μg/L	500	NR	NR
NWTPH-Dx	Lube Oil Range Hydrocarbons	4.00	25.0	μg/L	500	NR	NR
Volatile Organic	Compounds by EPA Method 82	260B in Wa	iter				
EPA 8260B	Benzene	0.0470	0.200	μg/L	5	0.8	32
EPA 8260B	Toluene	0.0210	0.200	μg/L	1,000	NR	640
EPA 8260B	Ethylbenzene	0.0660	0.200	μg/L	700	NR	800
EPA 8260B	Total Xylenes	0.247	0.750	μg/L	1,000	NR	1,600
EPA 8260B	Methyl tert-butyl ether	0.0930	1.00	μg/L	20	24	6,900
EPA 8260B	1,2-Dichloroethane (EDC)	0.0420	0.200	μg/L	5	0.48	160
EPA 8011	1,2-Dibromoethane (EDB)	0.600	5.00	μg/L	0.01	0.00051	NR
EPA 8260B	n-Hexane	0.129	1.00	μg/L	NoD	NR	480
Polynuclear Arol	matic Compounds by GC/MS w	ith High Vo	olume Injec	tion in Water			
EPA 8270C-HVI	Acenaphthene	0.00600	0.100	μg/L	NoD	NR	160
EPA 8270C-HVI	Acenaphthylene	0.00700	0.100	μg/L			
EPA 8270C-HVI	Anthracene	0.00900	0.100	μg/L	NoD	NR	4,800
EPA 8270C-HVI	Benzo(a)anthracene	0.00500	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	Benzo(a)pyrene	0.00600	0.0100	μg/L	0.1	0.012	NR
EPA 8270C-HVI	Benzo(b)fluoranthene	0.00600	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	Benzo(k)fluoranthene	0.00600	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	Benzo(ghi)perylene	0.00700	0.100	μg/L			
EPA 8270C-HVI	Chrysene	0.00600	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	Dibenz(a,h)anthracene	0.00500	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	Fluoranthene	0.00900	0.100	μg/L	NoD	NR	640
EPA 8270C-HVI	Fluorene	0.00800	0.100	μg/L	NoD	NR	640
EPA 8270C-HVI	Indeno(1,2,3-cd)pyrene	0.00600	0.0100	μg/L	NoD	Tef	NR
EPA 8270C-HVI	1-Methylnaphthalene	0.00600	0.100	μg/L	NR	NR	NR
EPA 8270C-HVI	2-Methylnaphthalene	0.00800	0.100	μg/L	NR	NR	32
EPA 8270C-HVI	Naphthalene	0.00600	0.100	μg/L	160	NR	160
EPA 8270C-SIM	Pentachlorophenol	0.0068	0.01	μg/L	NoD	0.73	480
EPA 8270C-HVI	Phenanthrene	0.00800	0.100	μg/L	NR	NR	NR
EPA 8270C-HVI	Pyrene	0.00700	0.100	μg/L	NoD	NR	480

Table 2 Indicator Hazardous Substances

					MTCA Method A	MTCA	Method B					
Method	Analyte	MDL	MRL	Unit	Unrestricted	Carcinogenic	Noncarcinogenic					
Dissolved Metals	Dissolved Metals by EPA 6000/7000 Series Methods in Water											
EPA 6020 - Diss	Dissolved Lead	0.000900	0.00100	mg/L	15	NR	NR					

Notes:

1. TPH gasoline with benzene present/TPH gasoline without benzene present MTCA = Model Toxics Control Act

NoD = No data

NR = Not researched $\mu g/kg = microgram per kilogram$ $\mu g/L = microgram per liter$ mg/kg = milligram per kilogram

Tef = Toxic equivalency factor

mg/L = milligram per liter

Table 3 Soil and Groundwater Sampling Locations

Sample	Soil	Drilling	Maximum	No. of Soil	Screen	No. of Groundwater
Location	Sample Label	Method	Depth (feet)	Samples	Elevation ¹	Samples
Soil Borings						
AP-1	AP-1-(depth in feet)	Direct push	15	2	N/A	0
AP-2	AP-2-(depth in feet)	Direct push	15	2	N/A	0
AP-3	AP-3-(depth in feet)	Direct push	15	2	N/A	0
AP-4	AP-4-(depth in feet)	Direct push	15	2	N/A	0
AP-5	AP-5-(depth in feet)	Direct push	15	2	N/A	0
AP-6	AP-6-(depth in feet)	Direct push	15	2	N/A	0
AP-7	AP-7-(depth in feet)	Direct push	15	2	N/A	0
Duplicate soil sample ²	DUP-S-1			1		
AB-1	AB-1-(depth in feet)	HSA	35	2	N/A	0
AB-2	AB-2-(depth in feet)	HSA	35	2	N/A	0
AB-3	AB-3-(depth in feet)	HSA	35	2	N/A	0
AB-4	AB-4-(depth in feet)	HSA	35	2	N/A	0
AB-5	AB-5-(depth in feet)	HSA	35	2	N/A	0
AB-6	AB-6-(depth in feet)	HSA	35	2	N/A	0
AB-7	AB-7-(depth in feet)	HSA	35	2	N/A	0
MW-A7	MW-A7-(depth in feet)	HSA	35	2	N/A	0
Duplicate soil sample ²	DUP-S-2			1		
Monitoring Wells						
MW-A3	MW-A3-(depth in feet)	HSA	15	2	0 to 10	4
MW-A4	MW-A4-(depth in feet)	HSA	15	2	0 to 10	4
MW-A5	MW-A5-(depth in feet)	HSA	15	2	0 to 10	4
MW-A6	MW-A6-(depth in feet)	HSA	15	2	0 to 10	4
MW-A7	(3)	HSA	15	(3)	0 to 10	4
Duplicate groundwater sample ⁴	DUP-GW-1					4
Total Samples				40		24

- 1. Approximate elevation in feet above mean sea level.
- 2. Duplicate samples will be collected from intervals exhibiting evidence of potential contamination, such as staining or odor.
- 3. Soil samples for this boring are listed under soil borings.
- 4. A duplicate groundwater sample will be collected each quarter.

HSA = hollow-stem auger N/A = not applicable

Table 4 Sample Containers, Preservation and Storage

Analysis	Method	Sample Container	Number of Containers	Preservation and Storage	Holding Times
Soil					
Hydrocarbon Identification	NWTPH-HCID	8 oz. CWM jar with PTFE lid	1	4° C	14 days
Gasoline Range Organics	NWTPH-Gx	VOA vial w/MeOH	1	10 mL MeOH	14 days
Diesel Range Organics ¹	NWTPH-Dx	8 oz. CWM jar ² with PTFE lid	1	4° C	14 days
EPH	MTCA-NW EPH	8 oz. CWM jar ² with PTFE lid	1	HCl pH<2; 4° C	14 days
VPH	MTCA-NW VPH	8 oz. CWM jar ² with PTFE lid	1	HCl pH<2; 4° C	14 days
Volatile Organic Compounds ^{3,4}	EPA 8260B	VOA vial w/stir bar ⁵	2	Freeze within 48 hrs	14 days
Polycyclic Aromatic Hydrocarbons	EPA 8270D	8 oz. CWM jar ² with PTFE lid	1	4° C	14 days
Water			-		
Gasoline Range Organics	NWTPH-Gx	VOA vial w/MeOH	3	HCl pH<2, 4° C	14 days
Diesel Range Organics	NWTPH-Dx	500-mL amber bottle	2	HCl pH<2, 4° C	14 days
Volatile Organic Compounds ^{3,4}	EPA 8260B ⁶	VOA vial	3	HCl pH<2, 4° C	14 days
Polycyclic Aromatic Hydrocarbons	EPA 8270D	1-Liter Amber	2	None	7 days
Dissolved Lead ⁷	EPA 6020	500-mL polyethylene	1	None	180 days ⁸

- 1. Silica gel cleanup will be performed on samples where the chromatograph indicates a possible biogenic influence.
- 2. Sample fraction would come from the same 8 oz jar that was collected for NWTPH-HCID.
- 3. Includes benzene, toluene, ethylbenzene, total xylenes, and methyl tertiary-butyl ether.
- 4. Includes 1,2-dichloroethane, 1,2-dibromoethane, and n-hexane for selected samples that appear to be contaminated based on field screening.
- 5. Sample volume = 5 ounces
- 6. 1,2-Dibromoethane will be analyzed using EPA Method 8011.
- 7. Sample to be filtered in the lab.
- 8. Sample must be filtered within 48 hours of collection for this holding time to apply.

CWM jar = Clear, wide-mouth glass jar

EPH = Extractable petroleum hydrocarbons

HCI = Hydrochloric acid

MeOH = Methanol

PTFE = teflon

VOA = volatile organic analysis

VPH = Volatile petroleum hydrocarbons

Geotechnical Parameter	Analytical Method	Sample Container and Volume	Number of Containers	Preservation and Storage	Holding Time
Fraction organic carbon	Organic content burn	5-gallon bucket	2	None	180 days
Soil bulk density	Unit weight/volume	5-gallon bucket	2	None	180 days
Total soil porosity	(1)	5-gallon bucket	2	None	180 days
Volumetric water content	(2)	5-gallon bucket	2	None	180 days
Permeability		Shelby tube	1	Seal ends and store upright	180 days
Volumetric air content		5-gallon bucket	2	None	180 days

- 1. Calculated w/ bulk density and particle density.
- 2. Calculated w/ gravimetric water content.

 Table 6
 Natural Attenuation Parameter Sampling Containers, Preservation, and Storage

Natural Attenuation Parameter Analysis ¹	Method	Sample Container	Number of Containers	Preservation and Storage	Holding Time
Dissolved oxygen (DO)	Field-measured	N/A	N/A	N/A	N/A
Oxidation-reduction potential (ORP)	Field-measured	N/A	N/A	N/A	N/A
рН	Field-measured	N/A	N/A	N/A	N/A
Specific conductance	Field-measured	N/A	N/A	N/A	N/A
Temperature	Field-measured	N/A	N/A	N/A	N/A
Sulfate	EPA 300.0	500 mL unpreserved polyethylene	1	none	28 days
Nitrate	EPA 300.0	500 mL unpreserved polyethylene	1	none	2 days
Ferrous iron (soluble)	Field-measured	N/A	N/A	N/A	N/A
Manganese (soluble)	EPA 6020	500 mL HNO ₃ polyethylene	1	HNO_3	180 days
Methane	RSK175	40 mL HCl Vials	3	HCI	14 days
Alkalinity	EPA 310.1	500 mL unpreserved polyethylene	1	none	14 days

¹Ecology, 2005

HCI = hydrochloric acid

 $HNO_3 = nitric acid$

NA = not applicable

VOAs = volatile organic analysis

Table 7 Tidal Study Well Specifications

	Date	Well	Screened	TOC	Depth to	Groundwater	Summary of
Well No.	Installed	Depth (feet)	Interval (feet)	Elevation ¹	Water ²	Elevation ³	Lithology
W-3	Feb-90	22.9 ⁴	3 to 23	13.27	5.88	7.39	sand; H ₂ S odor
W-6	Feb-90	6.5 ⁴		14.95	2.83	12.12	sand; organic clay;H ₂ S odor
MW-11	Mar-88	18.72 ⁴	NS in log	16.28	2.71	13.57	sand (fill); peat
MW-19	Mar-91	5.26 ⁴	NS in log	12.79	2.76	10.03	sand
MW-28	June-91	12.18 ⁴	2.5 to 11.5	13.86	1.25	12.61	silty sand; peat
MW-40R	No log	12.51 ⁴	No log	15.56	3.35	12.21	No log
MW-A1	Feb-08	15.5	5.5 to 15.5	14.07	7.18 ⁵	6.89	sand & gravel (fill)
MW-A2	Feb-08	15.5	5.5 to 15.5	12.56	5.82 ⁵	6.74	sand & silt (fill)
MW-A3	TBI	TBD	25 to 35 ⁶	TBD	TBD	TBD	TBD
MW-A4	TBI	TBD	25 to 35 ⁶	TBD	TBD	TBD	TBD
MW-A5	TBI	TBD	25 to 35 ⁶	TBD	TBD	TBD	TBD
MW-A6	TBI	TBD	25 to 35 ⁶	TBD	TBD	TBD	TBD
MW-A7	TBI	TBD	25 to 35 ⁶	TBD	TBD	TBD	TBD

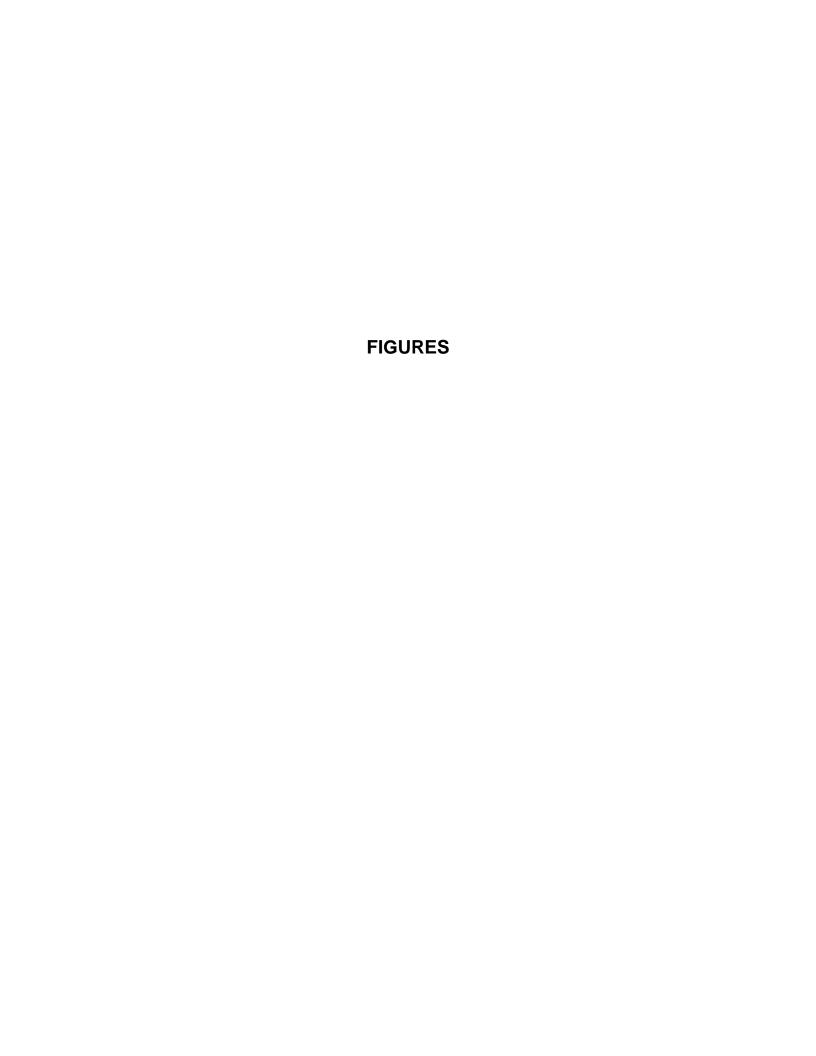
- 1. TOC elevation is in feet above mean sea level.
- 2. Depth to water in feet below ground surface measured prior to installation of pressure transducer on February 21, 2008.
- 3. Groundwater elevation is in feet above mean sea level measured prior to installation of pressure transducer on February 21, 2008.
- 4. Total depth of well measured on February 21, 2008.
- 5. Depth to water measured on February 24, 2009.
- 6. Screened interval depth is approximate as wells have not been installed.

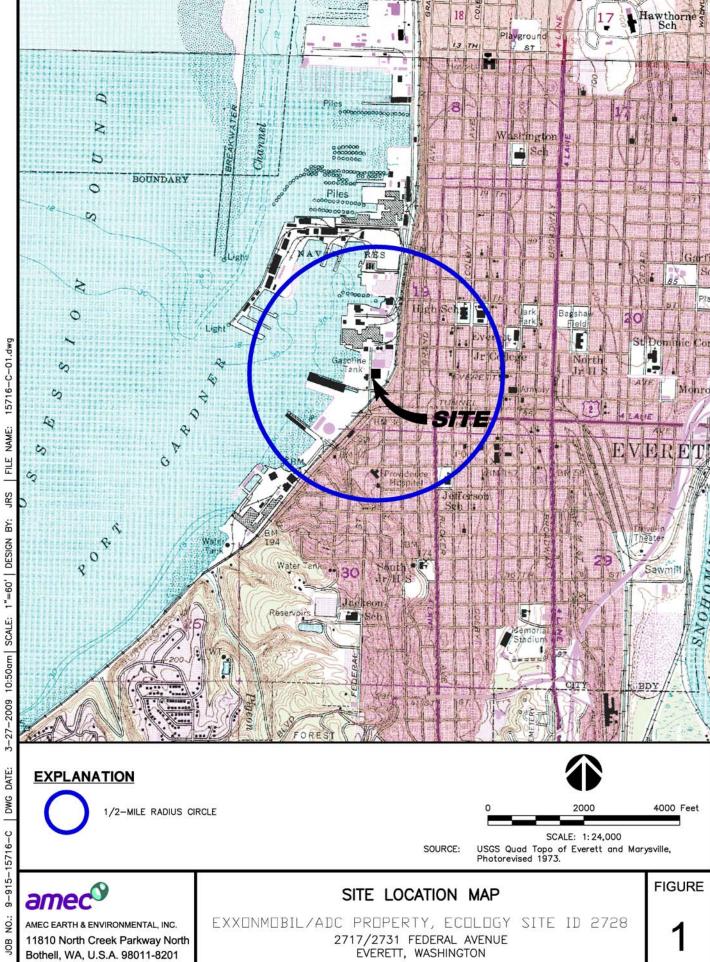
 H_2S = hydrogen sulfide

NS = Not specified

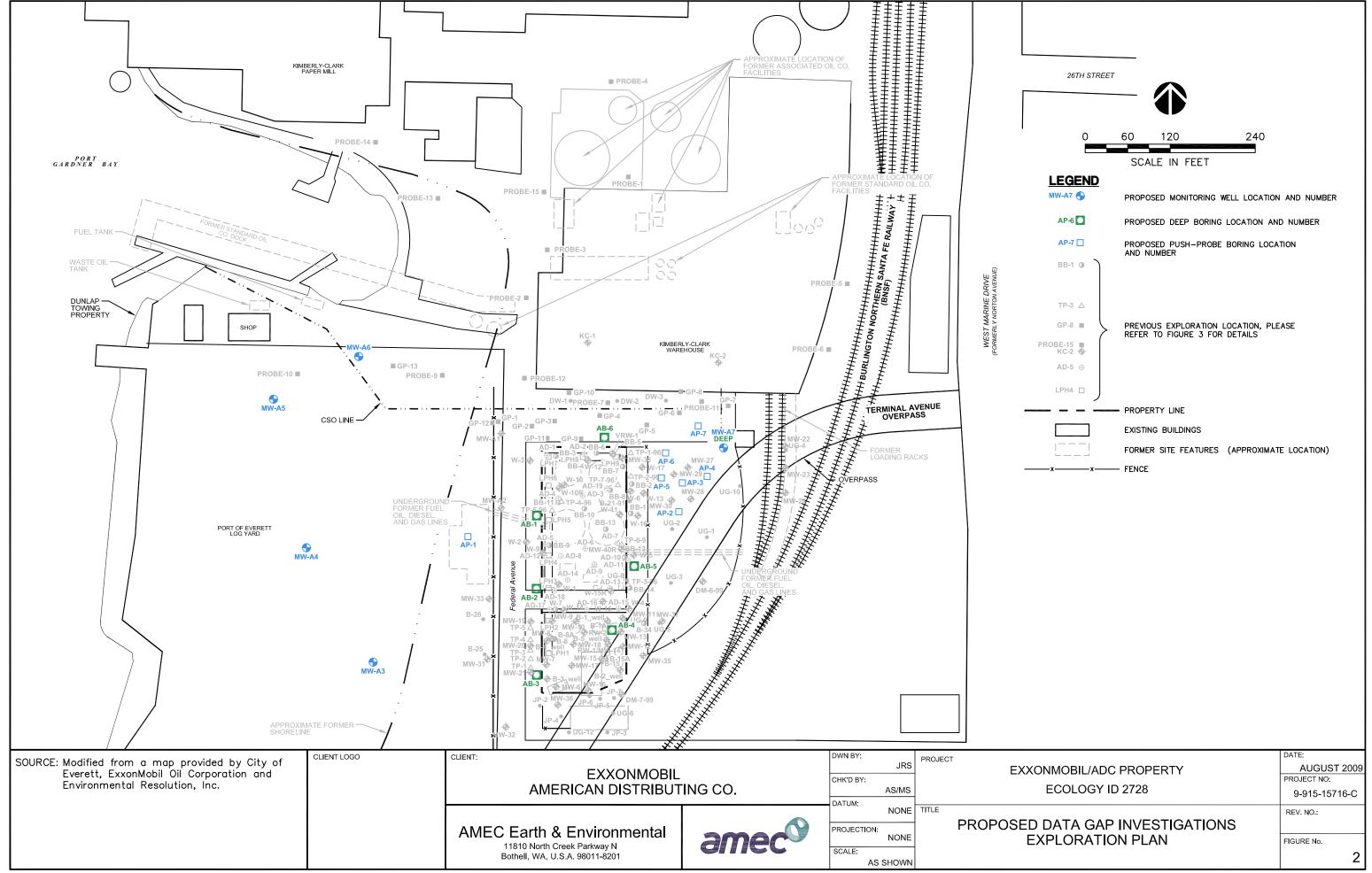
TBI = To be installed

TBD = To be determined





NO.:



ATTACHMENT A1

Site-Specific Health and Safety Plan





Site Safety Plan: Updated 09.01.09

Project Name: Site Former Mobile Oil Terminal 46-108, Everett, Washington

SITE SPECIFIC HEALTH AND SAFETY PLAN

Project Name: ExxonMobil/ADC Property, Ecology Site ID 2728

Project Location: 2717/2731 Federal Avenue, Everett, Washington

Project Number: 9-91-51571-6C

THIS SITE SPECIFIC HEALTH AND SAFETY PLAN APPLIES ONLY TO AMEC PERSONNEL.

All site personnel must have completed the 8-hour ExxonMobil LPS Training prior to undertaking any field work at the site.

A PRE-ENTRY BRIEFING MUST BE HELD PRIOR TO INITIATING ANY SITE ACTIVITY AND AT OTHER TIMES AS NECESSARY TO ENSURE EMPLOYEES ARE APPRISED OF THE SITE HEALTH AND SAFETY PLAN.

SAFETY PERSONNEL:

Health and Safety Coordinators:

Project Engineers:

Leah Vigoren and Anastasia Speransky
Leah Vigoren and Stephen Dailey
Meg Strong and Gary Dupuy

Site Safety Coordinator (SSC): Leah Vigoren

Client Contact: Joe Abel: ExxonMobil Environmental Services (EMES)

EMERGENCY CONTACTS:

Hospital / Emergency Room: Providence Medical Center 425-258-7555

Map showing shortest route to Hospital is attached to this document.

Fire: 911
Police: 911
Poison Control Center: 1-800-222-1222
Emergency Water Shut-off: Everett 1-425-257-8821
Electric Utility: Snohomish County PUD 1-877-783-1000
Washington State Patrol: 911

Health and Safety Coordinator: Leah Vigoren (Cell Phone: 206-351-9449)

Project Manager: Meg Strong (Cell Phone: 425-864-2096)

206-342-1760 (w)
425-368-0966 (w)

AMEC Earth & Environmental, Inc. 11810North Creek Parkway Bothell, Washington USA 98011 (425) 368-1000 Phone (425) 368-1001 Facsimile



Site Safety Plan: Updated 09.01.09

Project Name: Site Former Mobile Oil Terminal 46-108, Everett, Washington

Project Number: 9-91-51571-6C

SITE HISTORY

The approximate 1-acre site was purchased by ExxonMobil's historic predecessors in 1922, and was utilized as a petroleum bulk storage distribution facility between 1922 and 1974. In 1974, the then Mobile Company sold two thirds of the site (northern portion) to A.P. Miller (Miller), for use by the American Distributing Company (ADC). In 1987, Mobile discontinued petroleum storage and dispensing operations on their portion of the site and removed all storage tanks and ancillary equipment. In 1990, petroleum distribution was discontinued on the ADC parcel, and some improvements and tanks were removed from the parcel. Since then, the site has been turned into a parking lot and is leased to the Kimberly Clark facility located to the north of the site. Activities that have occurred on the site since this time have been environmental investigations and remedial activities to address petroleum impacts to soil and groundwater.

In 1985, site characterization activities were initiated to define the nature and extent of petroleum impacts beneath the site. Between 1988 and 1996, a variety of Interim Remedial Action Measures (IRAMs) were implemented to address the free product. In 1998, a Remedial Investigation/Focused Feasibility Study (RI/FFS) was performed in coordination of the Washington State Department of Ecology (Ecology) under the Consent Order. Remedial Action Objectives (RAOs) were developed for the site based on the RI data and baseline human health risk assessment. The remedy selected to achieve RAOs included the following.

- Construction of an interceptor trench along the down gradient margins of the site (entire western and northern boundaries) to mitigate the off-site migration of the light non-aqueous phase liquid (LNAPL) present on the shallow water table.
- Placement of low-permeability cap across the entire site surface
- Ongoing removal and disposal of recovered LNAPL from site monitoring wells and interceptor trench; and
- Quarterly groundwater monitoring.

ORGANIZATIONAL STRUCTURE

Project Manager(s):

Gary Dupuy (phone number 206-342-1777) and Meg Strong (phone number 425-368-0966) are the client managers for the project. Responsibilities include remaining in contact with regulatory agencies such as the Department of Ecology, overseeing the Project and ensuring client satisfaction from commencement to closeout.

Site Safety and Health Supervisor:

Leah Vigoren (phone number 206-838-8470) and Anastasia Speransky (phone number 206-838-1776) are the acting Health and Safety Coordinators (HSCs). Primarily the duties of the HSC entail coordination with the Project manager for preparation of site health and safety plans, assessment of chemical hazards and selection of safety / monitoring equipment.

The HSC will also take on the duties of the Site Safety Coordinator. The SSC has the responsibility of implementing the Site Health and Safety Plan while at the Site. The SSC / HSC will be involved with the Project Manager in preparation of the Site Health and Safety Plan. If the plan is not being implemented or if unanticipated situations arise, the SSC / HSC may stop all proceedings and see that all personnel depart the site. The SSC / HSC will have charge of all instruments and see to their proper use and function.



Project Number: 9-91-51571-6C

Site Safety Plan: Updated 09.01.09

Project Name: Site Former Mobile Oil Terminal 46-108, Everett, Washington

Project Name : Site Former Mobile Oil Terminal 46-108, Everett, Washington

Project Engineer:

Stephen Dailey (phone number 206-342-1775) is the project engineer and is responsible for developing the site conceptual model and providing engineering input to the FFS.

Field Technicians:

Joseph C. Petrick, and Danah Palik are the Field Technicians whose responsibilities include obtaining groundwater samples and other data, as required, from monitoring wells. Keeping field records (I.e. Daily Field Logs) describing field activities, observations and site events. Supplying daily reports and reporting all incidents to the Project Engineer.

Subcontractor

Transport and disposal company (Clear Harbors: AWSL Subcontractor) is responsible for removing all waste from the jobsite and transferring it to a certified facility for disposal.

Drilling company "Cascade Drilling, Inc." is responsible for the advancement of soil borings and the installation of monitoring wells on the site.

ON SITE TASKS

AMEC to remove light non-aqueous phase liquid (LNAPL) monthly and continue the quarterly groundwater monitoring program at the site. Groundwater samples will be collected and analyzed for diesel and heavy oil range organics using Method Northwest Total Petroleum Hydrocarbons Diesel Extended (NWTPH: NWTPH-D, which includes NWTPH-oil (O)) with Silica Gel clean-up), gasoline range organic compounds using Method NWTPH-gasoline Extended (Gx), and benzene, toluene, ethyl benzene, and total xylenes (BTEX) using U.S. Environmental Protection Agency (EPA) Method 8260B.

During monthly O&M events LNAPL is collected by AMEC personnel and stored in two 55-gallon drums within a secured shed on the project site. To mitigate spill hazards, and possible drum failure, these drums are placed on a secondary containment platform which would collect any spilled free liquids. When the drums are full a certified waste transporter and disposal company (ASWL Subcontractor) is contacted to transport the drums for disposal.

AMEC will oversee the advancement of 18 soil borings and the installation of 5 new monitoring wells on the site. Cascade Drilling of Woodinville Washington will conduct the drilling on the site and provide all equipment and personnel necessary. This work will require utility clearances prior to the initiation of drilling. Drilling involves the use of heavy equipment which will require safety precautions during set up and operation. Drilling and sampling at the site brings potentially-contaminated subsurface materials to the surface where Cascade drilling personnel or AMEC personnel overseeing the drilling may be exposed. Soil samples will be collected from each soil boring; a total of 2 samples per boring will be submitted for analyses including NWTPH-Dx, NWTPH-Gx, and BTEX by 8260B. After monitoring well installation, the 5 new wells will be sampled as part of AMEC's ongoing quarterly groundwater monitoring program at the site.

AMEC will be conducting a tidal influence study in which a stilling well will need to be installed on a portion of the Everett pier. The stilling well will need to extend into the water such that the lower portion of it is always submerged. The tidal influence study will consist of programming and installing pressure transducers and data loggers in approximately 12 monitoring wells which will measure water level fluctuations which will be analyzed for the presence and extent of tidal influence.

Project Number: 9-91-51571-6C

Site Safety Plan: Updated 09.01.09

Project Name: Site Former Mobile Oil Terminal 46-108, Everett, Washington

SAFETY & HEALTH HAZARDS ANALYSIS

a) Physical Hazards

Physical hazards that may be encountered during site activities include noise, manual lifting, powerful moving parts and weather related hazards (cold, heat stress, wind). Hard hats, safety glasses, hearing protection and steel-toed boots will be required for all personnel working in the vicinity of heavy equipment.

Identified hazards may be mitigated by using safe work practices at all times. The SSC has total responsibility for ensuring that all AMEC personnel on-site perform work tasks in a safe and sensible manner. If at any time the SSC determines that safe work practices are not followed, the tasks will be suspended and corrective actions will be taken.

Because of the potential of explosion hazard presented during groundwater monitoring (i.e., W-2) **SMOKING WILL NOT BE ALLOWED WITHIN 50 FEET OF THE WORK ZONE.**

The following are all additional site related hazards:.

1) Traffic

a. Cones will be set out around the work area and safety reflective vests will be worn.

2) Personnel or property damage from vehicle movement.

- a. When moving vehicles the following precautions must be taken
- b. Equipment must be stowed and secured
- c. A spotter must be used due to the presence of blind spots in the driver's field of vision.
- d. The spotter must identify any surface obstruction / anomalies
- e. Audible warning signals and hand signals must be used.
- f. Operator must yield to pedestrians.

3) Personal injury from handling heavy objects.

- Use proper lifting techniques; keeping back straight and lift with arms and legs; keep load near body; avoid reaching.
- b. Do not attempting to lift anything that weighs more than 60 pounds.
- c. Use mechanical equipment such as a cart to carry / lift large, heavy or awkward loads.

4) Slips, trips and falls.

- a. Scan area prior to start of work.
- b. Group all equipment and waste in one designated area.
- c. Return tools not in use to storage.

5) Pinch points on drum and well covers.

a. Personnel will wear leather gloves when working with well and drum covers.

6) Broken Glassware

- a. Personnel will use bubble wrap and blue ice when transporting samples in glass containers.
- b. Personnel will not overtighten caps on glass bottles.

b) Chemical Hazards

Chemical hazards that could possibly be encountered include Gasoline, BTEX, hydrogen sulfide (H₂S), and methane (CH₄). The Permissible Exposure Limit (PEL) for Gasoline, BTEX, and hydrigen sulfide, and the Threshhold Limit Value (TLV) for methane are listed in the attached table. The nature of this project precludes continuous exposure to any potential contaminant.

Per past anecdotal evidence, monitoring well (MW) 30 occasionlly has contained small amounts of hydrogen sulfide gas. In addition, during installation, well (W) 2 contained methane gas exceeding the lower explosive limit (LEL). AMEC will conduct initial air monitoring using a multi-gas combustible gas





Site Safety Plan: Updated 09.01.09

Project Name: Site Former Mobile Oil Terminal 46-108, Everett, Washington

indicator (CGI) upon opening wells for sampling. Ensure that the atmosphere is less than 10% LEL, contains between 19.5% and 23.5% oxygen, less than 10 parts per million (ppm) H₂S and less than 10 ppm carbon monozide prior to proceeding with sampling. Each well will be continuously monitored during sampling. The CGI will alarm if atmospheric concentrations exceed the levels required for entry. (Subsequent air monitoring for the year following installation indicates that no hazardous amounts of CH₄ have been detected in or nearby W2 since installation.

1) Personal Injury from chemical contact / exposure / inhalation.

- Inspect drums before handling to ensure they are not leaking or bulging, or show any signs of loss of integrity.
- b. AMEC personnel will place themselves upwind when opening monitoring wells.

2) Personal injury from vapor ignition.

a. AMEC personnel will use metal buckets when collecting and moving product.

c) Biological Hazards

The project site is a flat graded parking lot which eliminates most biological hazards. Current biological hazards are limited to the possibility of insects and / or rodents residing within the monitoring wells. AMEC personnel will take caution when opening the wells and will be wearing leather gloves to mitigate this hazard.

TRAINING

All AMEC personnel will review the site specific Heath and Safety plan before accessing the site. Personnel onsite will also have current 40-Hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Certification.

Certificates of HAZWOPER completion will be maintained at the Kirkland office and will be available to regulatory personnel upon request. All Personnel shall carry current 40-hour HAZWOPER training cards or appropriate paperwork while working onsite. The SSC / HSC shall be first aid and CPR trained.

In addition all site personnel must have completed the **8 hour ExxonMobil LPS Training** prior to undertaking any field work.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

AMEC will wear Level D PPE which consists of steel-toed, chemical resistant rubber boots, inner glove of PVC or latex, outer gloves of Nitrile or equivalent, safety glasses, Tyvek coveralls, and a hard hat. During construction activities, minimal PPE hearing protection will consist of soft foam ear-bud style plugs.

MEDICAL SURVEILLANCE

Evidence of a current physical examination in the form of a letter from an examining physician will be maintained at the Bothell office and will be available to regulatory personnel upon request.

Air Monitoring

AMEC will conduct initial air monitoring using a photoionization detector (PID) upon opening wells for sampling. PID utilizes ultaviolet light to ionize gas molecules and is commonly employed in the detection of volatile organic compounds (VOCs). AMEC will ensure that the concentrations of VOCs are less than 5 parts per million (ppm) in breathing zone prior to proceeding with sampling. Each well will be continuously monitored during sampling. The





Site Safety Plan: Updated 09.01.09

Project Name: Site Former Mobile Oil Terminal 46-108, Everett, Washington

PID will alarm if VOC concentrations exceed the levels required for breathing.

AMEC will calibrate the PID both pre and post site visits using Isobutylene calibration gas with compatible regulator.

Air monitoring wil be conducted during drilling and soil sampling activities.

Decontamination

Disposable PPE will be stored in a secured 55-gallon drum onsite. Monthly, a certified waste transporter and disposal company (ASWL Subcontractor) is contacted to transport the drum for disposal.

Water depth meters will be decon'd between depth recordings of individual monitoring wells using a clean metal bucket with distilled water and 1/10 parts cleaning solution.

Site Control

AMEC personnel will be provided with a site map and be required to review the Health and Safety plan prior to entry into the site. A copy of this HASP shall be on hand at all times with emergency contact numbers and directions to the nearest medical facilities easily accessible. When necessary (e.g. quarterly sampling), cones, caution tape or a suitable alternative will be used to deny public access to the work area. Cones will also be used to define an exclusion zone redirecting motorists and pedestrians away from the work area.

In all emergencies AMEC is to document the action taken and notify the HSC, Project Manager and client official of the event and subsequent response.

In the Event of an Injury

If an injury is life-threatening, follow steps 1 though 8 below. If the injury is not life threatening, perform necessary first aid and consider the need for decontamination prior to transport. The SSC shall be first aid and CPR trained.

- 1) Perform first aid necessary to determine victim(s) medical status
- Call emergency transport.
- 3) Give specific directions to location of emergency
- Give phone from which you are calling;
- 5) Tell emergency services what happened. Inform that victim(s) may be wearing contaminated clothing.
- 6) Inform emergency services how many persons need help.
- 7) Inform emergency services what is being done for the victim(s)
- 8) Stay on telephone until told to hang up.

Transport to hospital, if possible.

Work Permits

Copies of the permits will be available onsite during drilling activities. Cascade Drilling will obtain start cards required for drilling from the Washington State Department of Ecology.

Security

No unauthorized persons will be allowed in the work zone. Unauthorized persons are those without appropriate training, without proof of medical surveillance, and those with no business on the site.



Project Number: 9-91-51571-6C

Site Safety Plan: Updated 09.01.09 Project Name : Site Former Mobile Oil Terminal 46-108, Everett, Washington

Confined Space Entry Procedures

AMEC will not be entering confined spaces at the Site.

Spill Containment Program

The site specific accidental spill / release action plan consists of the following:

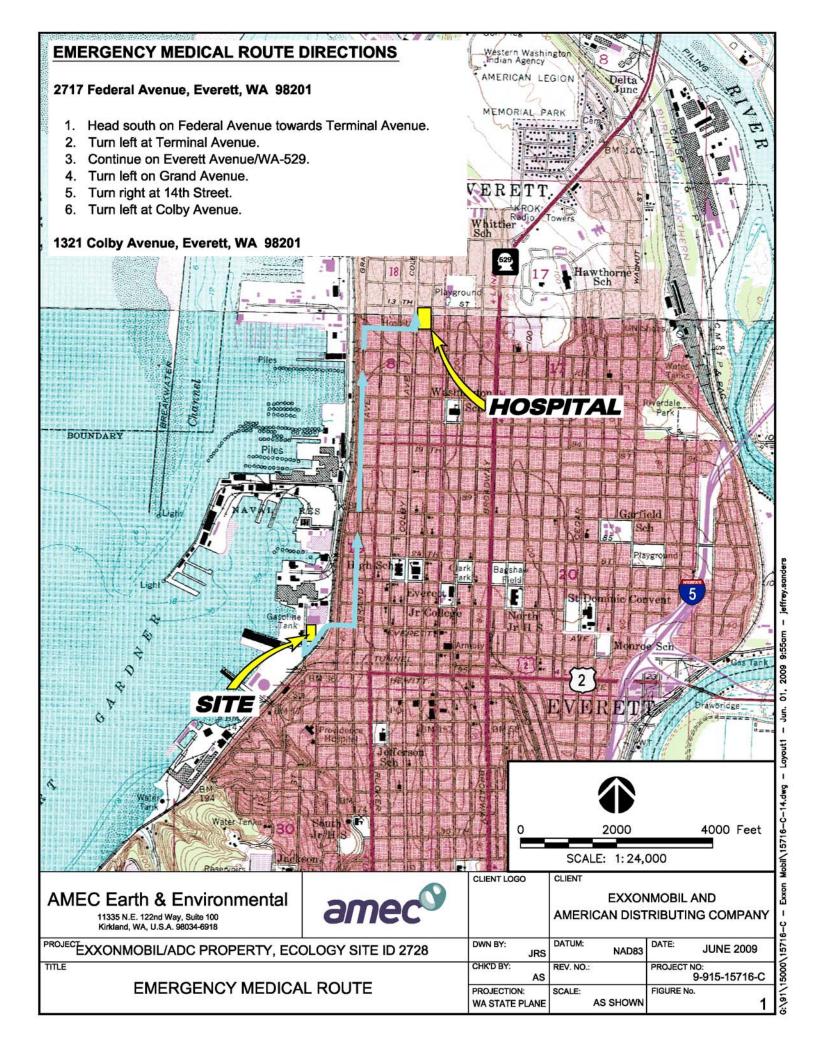
- 1) Pick up, isolate, or contain spill;
- 2) Evacuate area, if necessary;
- 3) Contact emergency agencies, if necessary.

Incident Reporting Requirements

In all emergencies, document action taken and notify the HSC / SSC, Project Manager and client officials of occurrences.

AMEC will report all incidents and Near Loss Incidents (NLI) to the ExxonMobil contact within 24 hours of the occurrence along with a written report and the launching of an accident investigation.

Attendance/Sign-In (name, date)			
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ATTACHMENT A2

Field Documentation Forms



AMEC Earth & Environmental, Inc.

 11810 North Creek Parkway N
 Tel
 (425) 368-1000

 Bothell, Washington 98011
 Fax
 (425) 368-1001

DAILY FIELD REPORT

DDO IFOT NAME		DDG IFOT NO	FIELD DEDODE NO		
PROJECT NAME		PROJECT NO.	FIELD REPORT NO.		
Mobil/ADC Everett Facility	9915-15716-0				
ADDRESS	DATE	PAGE			
2717/2731 Federal Avenue			OF		
CITY OR COUNTY	PERMIT NO.	ARRIVAL TIME	DEPARTURE TIME		
Everett, WA					
CLIENT	AMEC PROJECT MANAGER	ER/PHONE NO.			
ExxonMobil					
GENERAL CONTRACTOR	AMEC FIELD REPRESENTA	TIVE/ MOBILE NO.			
SUBCONTRACTOR	WEATHER				
TYPE OF WORK PERFORMED					
EQUIPMENT USED					

COMMENTS

AMEC (REV. 8/00)



LOW-FLOW GROUNDWATER SAMPLING LOG

WELL NO:		LOCATION:	PROJECT NO:										
DATE:		TIME:	CLIMATIC CONDITIONS:										
OVA/PID REAL	DING WHEN WELI	L OPENED:		DEPTH TO PRODUCT (TOC):									
STATIC WATE	R LEVEL (TOC):				TOTAL	DEPTH OF WELL	(TOC):						
	METHOD OF	REMOVAL:	PUMPING RATE:										
			.	_									
\\\=\\\	D.T. //		Gallons	Temp.		Sp. Cond.	Turbidity	DO	REDOX				
WELL	DTW	Time	Removed	(C₀)	pН	(mS/cm)	(NTU)	(mg/L)	(mv)				
PURGE													
DATA													
		-											
		-											
		-											
													
													
SAMPLE WITH	IDRAWAL METHO	D:					SAMPLED	BY:					
	BER(S) AND TIME												
NOTES:													
LAB ANALYSIS	S PARAMETERS A	AND PRESERVA	ATIVES:										
NUMBED AND			OC LICED.										
NUMBER AND	TYPES OF SAMP	LE CONTAINE	13 USED.	-									
-													
DECON. PRO	CEDURES:												
SAMPLES DEI					TRANS	PORTER:							
	DATE:					TIME:							

SOIL BORING LOG

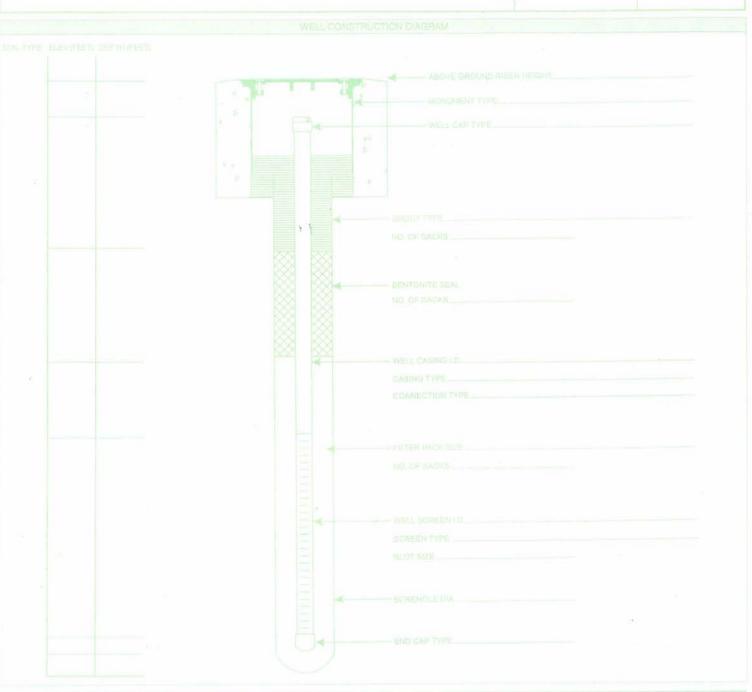


	2.				



AS-BUILT WELL LOG

PROJECT NO. 1	
	DATE COMPLETED
INSTALLABOR THE	



DOMMENTS

11720 North Creek Parkway N Suite 400

Chain of Custody Record



phone 425.420.9200 fax 425.420.9210

Bothell, WA 98011 TestAmerica Laboratories, Inc. Date: COC No: **Client Contact** Project Manager: Leah Vigoren Site Contact: Leah Vigoren COCs Tel/Fax: (206) 838-8470 AMEC Earth & Environmental, Inc. Lab Contact: Carrier: of _ Job No. 600 University Street Suite 1020 **Analysis Turnaround Time** Seattle, WA 98101 Calendar (C) or Work Days (W) (206) 342-1760 Phone TAT if different from Below SDG No. (206) 342-1761 FAX 2 weeks Project Name: ExxonMobil/ADC 1 week Site: Everett 2 days PO# 9915-15716C 1 day Sample Sample Sample # of Date Time Sample Identification Type Matrix Cont. Sample Specific Notes: Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other Sample Disposal (A fee may be assessed if samples are retained longer than 1 month) Possible Hazard Identification Archive For_ Non-Hazard ☐ Flammable Unknown Skin Irritant Return To Client Disposal By Lab Months Poison B Special Instructions/OC Requirements & Comments: Send electronic data to leah.vigoren@amec.com Date/Time: Date/Time: Relinquished by: Company: Received by: Company: Relinquished by: Company: Date/Time: Received by: Company: Date/Time: Relinquished by: Date/Time: Date/Time: Company: Received by: Company:

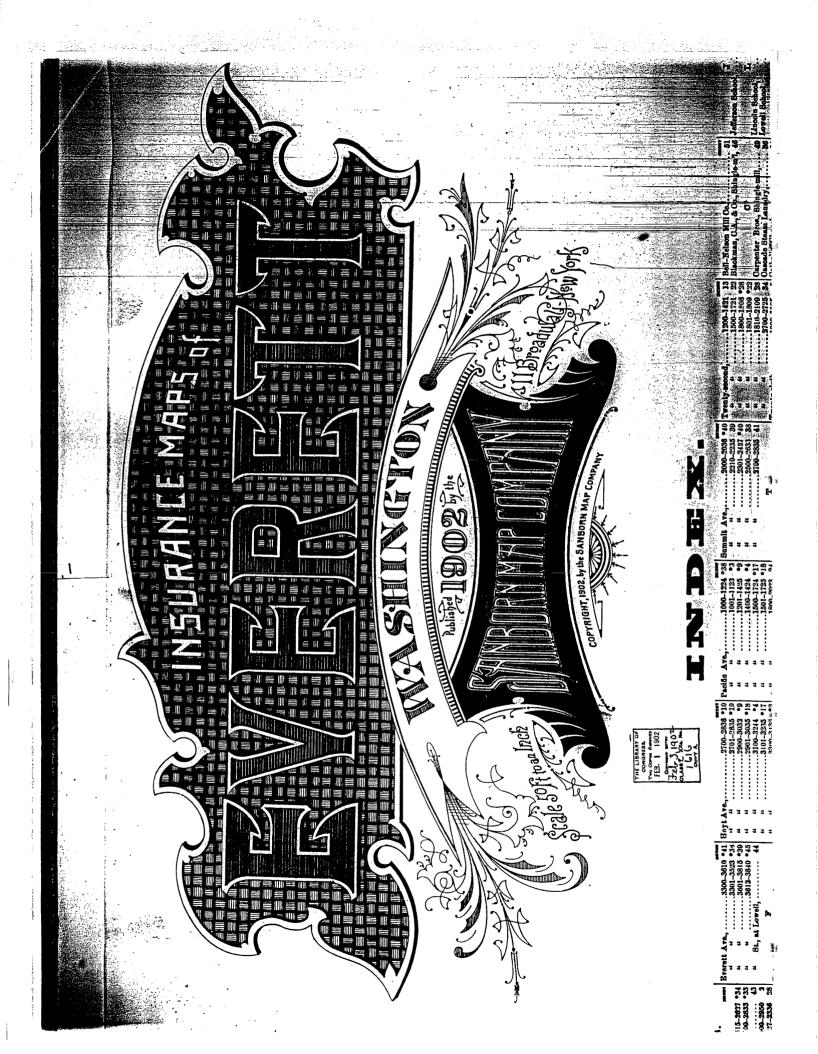


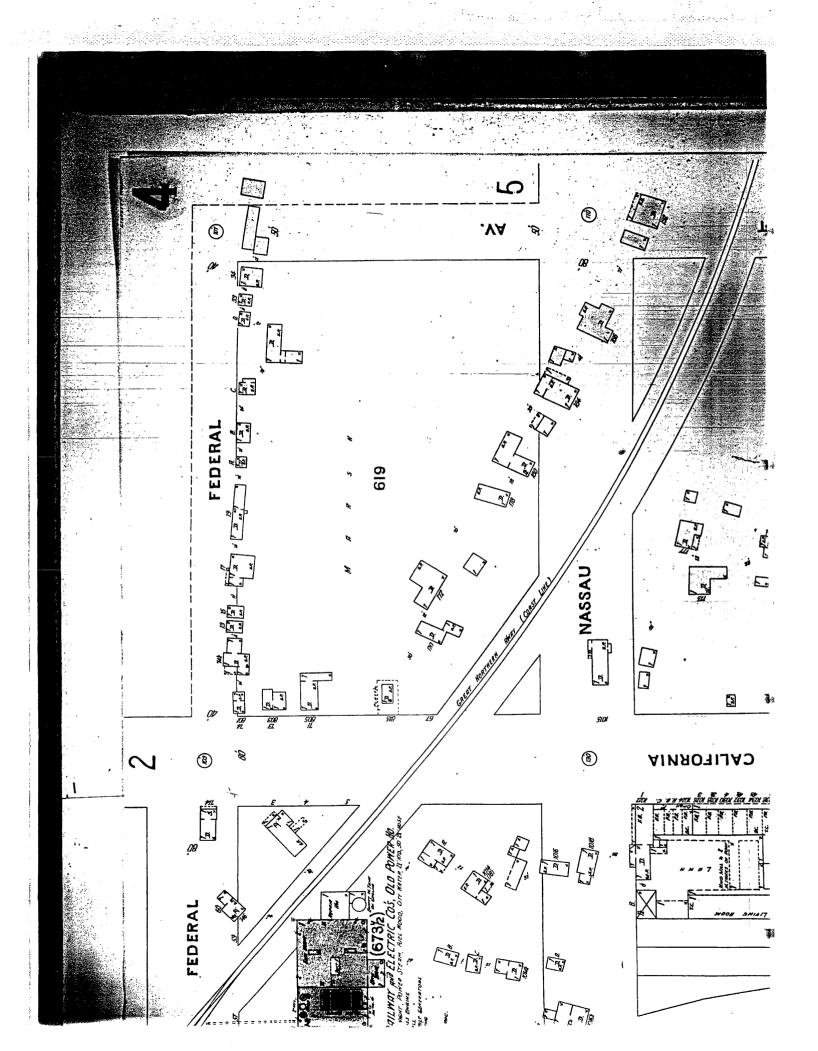
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1	WELL D	G	JOB NO.			DAT	DATE PREPARED BY						
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	AILER	R LEVEL_							ANIB LIGHT				
	JRGE LOCK			CAPACITY SALLONS/L						1E BETWEE (GALLONS)	LINEAR FO	OOT)	•
AI	R LIFT			2" =	0.16				,	ASSUMING		•	
0	THER				: 0.65 : 1.47	65 2" CASING AND 6" HOLE - 0.52							
				0 -						CASING AN CASING AN			
HOLE DI	AMETER (d _h =		d _w GROUND SURFACE	WELL '	VOLUN	МЕ СА	LCULATI	ON:				
WELL CA	ASING DIAMETER	d _w ID =	- 1	SURFACE					(d.ID) ²		()2		
OUTSI	DE ER (d _w OD =		_	CAS	SING V	OLUM	$E = V_c = 1$	$\Pi\left(\frac{\text{dwid}}{2}\right)$	TD - H) = 3.1	4(-2)(_) =	<u> </u>
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				l	r '	TOTAL WELL VOLUME = VT = Vc + Vf = + = ft.3 x 7.48 = ga						48 = gal.	
	DE ¹	VELOPMENT LO	G:	FLOW	WATER	R			WAT	ER QUALITY			COMMENTS
DTW	TIME BEGIN/END	METHOD	ELAPSED TIME	RATE (gpm)	GALLON		рН	TEMP	CONDUC TIVITY		REDOX	TURBID- ITY	

^{* =} Dissolved Oxygen

APPENDIX B

Historical Maps and Documentation

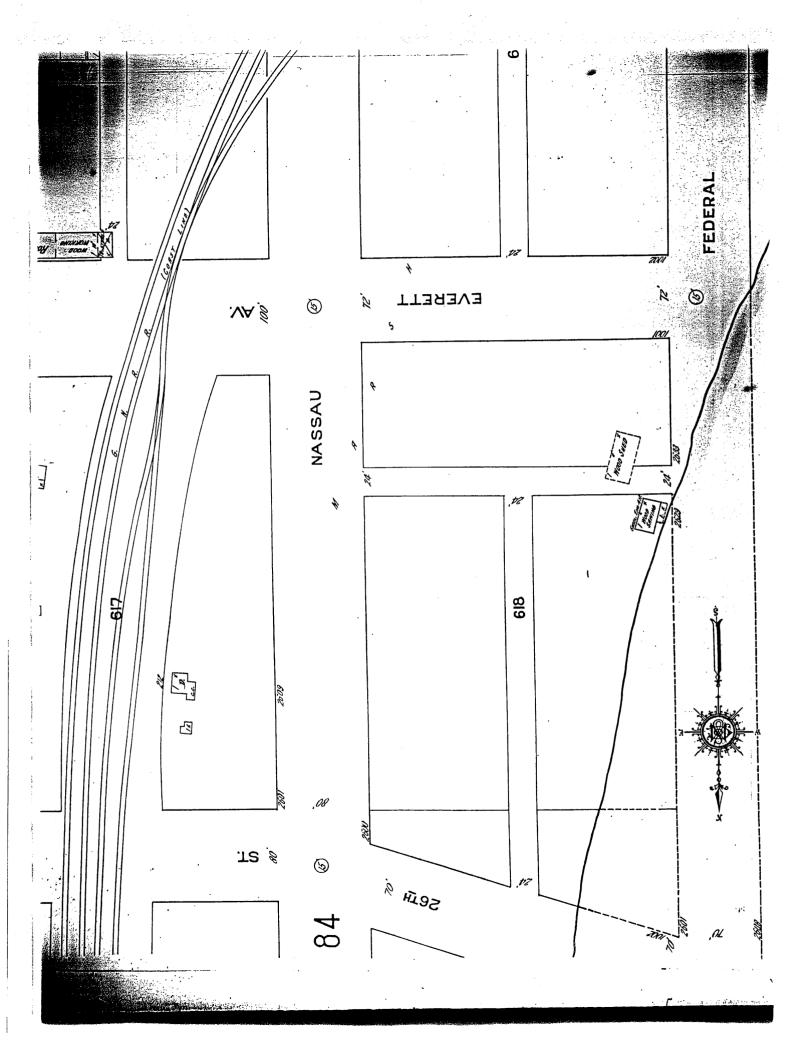








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FEDERAL ~ *57.* MASSAU

The regular Administrative Session of the City Council was held August 16, 1915, at 10:30 A.M. with Mayor Clay in the Chair and Commissioners Clay, Kelly and Salter present at roll call.

On motion minutes approved as of record. Moved by Kelly, seconded by Salter, that bills of A. C. Chilson for \$6.00 and H. J. Linden for \$11.65 for services as registration clerks beallowed and ordered paid.

Carried unanimously

Moved by Kelly, seconded by Salter that the City Attorney be instructed to prepare an ordinance covering the installation of oil tanks north of the G. N. Dock.

Carried unanimously

Moved by Kelly, seconded by Clay that the City Attorney be instructed to prepare an ordinance regulating the speed of Street Railway cars to conform to the speed allowed autos.

Carried unanimously

On motion Council adjourned at 11:00 A. M.

City Clerk

Lee

City Clerk

Local

Company

Company

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Com

An ordinance granting to the Standard Oil Company, a corporation, a permit to locate, erect, operate and maintain a ware-house or tankage, or both, and other necessary buildings, on a certain tract of land in the city of Everett described as follows: Lot 1, block 619, Plat of Everett, at the corner of Everett Avenue and Federal Street, for the storage and distribution of petroleum and its products, and other kinds of merchandise, by said company, and declaring an emergency.

THE CITY OF EVERETT DOES ORDAIN:

Section 1: That the Standard Oil Company, a corporation, be and it is hereby granted permission to locate, erect, operate and maintain a warehouse or tankage, or both, and other necessary buildings, upon that certain tract of Tand in the city of Everett described as follows: Lot 1, block 619, Plat of Everett, at the corner of Everett Avenue and Federal Street, for the storage and distribution of petroleum and its products, and other kinds of merchandise handled by said company, said warehouse, tankage and buildings to be constructed in accordance with the plans and specifications therefor filed by said company with the city clerk of the city of Everett and now on file in the office of said clerk.

Section 2: WHEREAS, it is desirous to begin the construction of said warehouse, tankage and buildings immediately, an emergency is declared to exist, and this ordinance shall take effect upon its passage and publication.

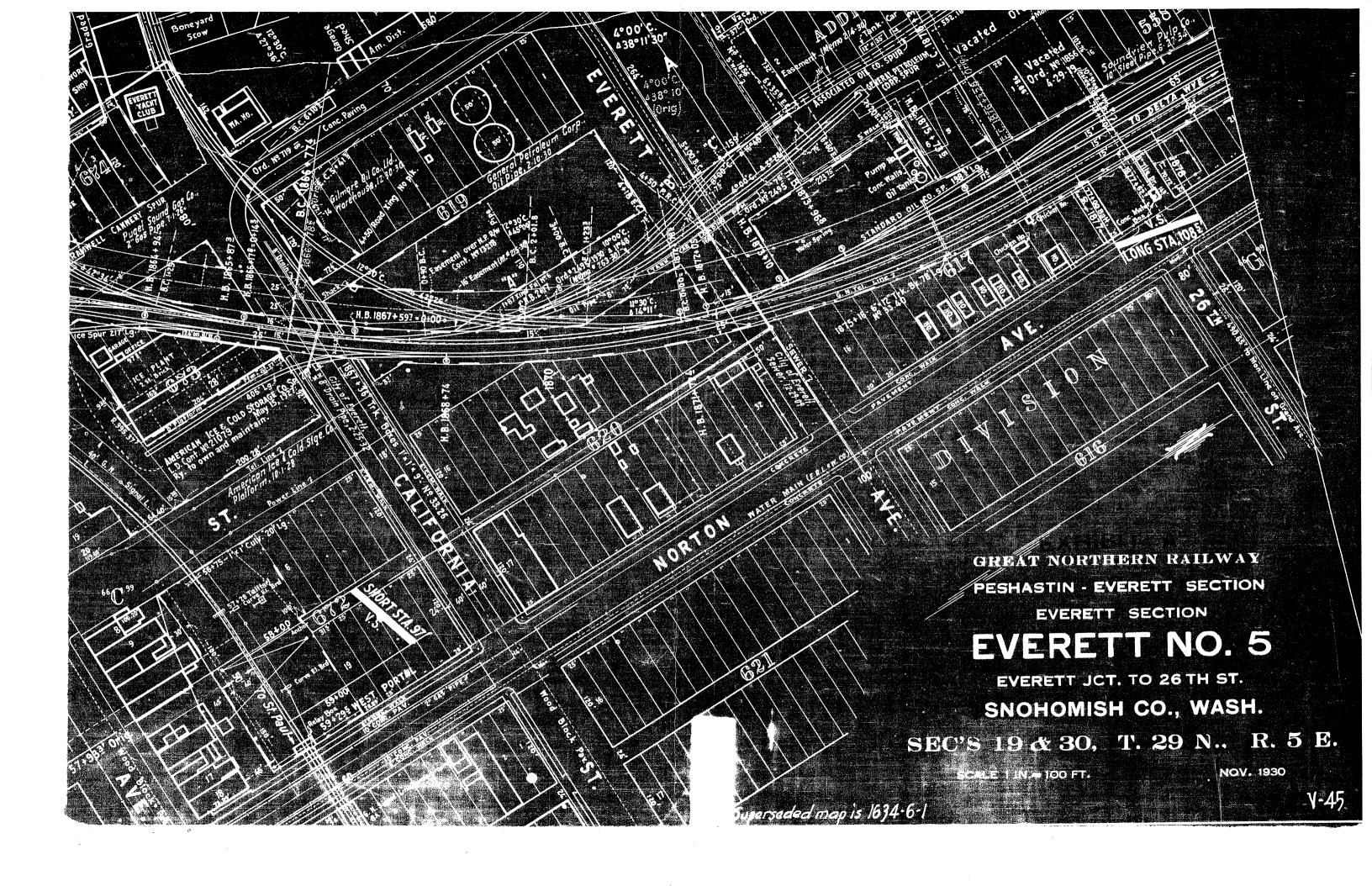
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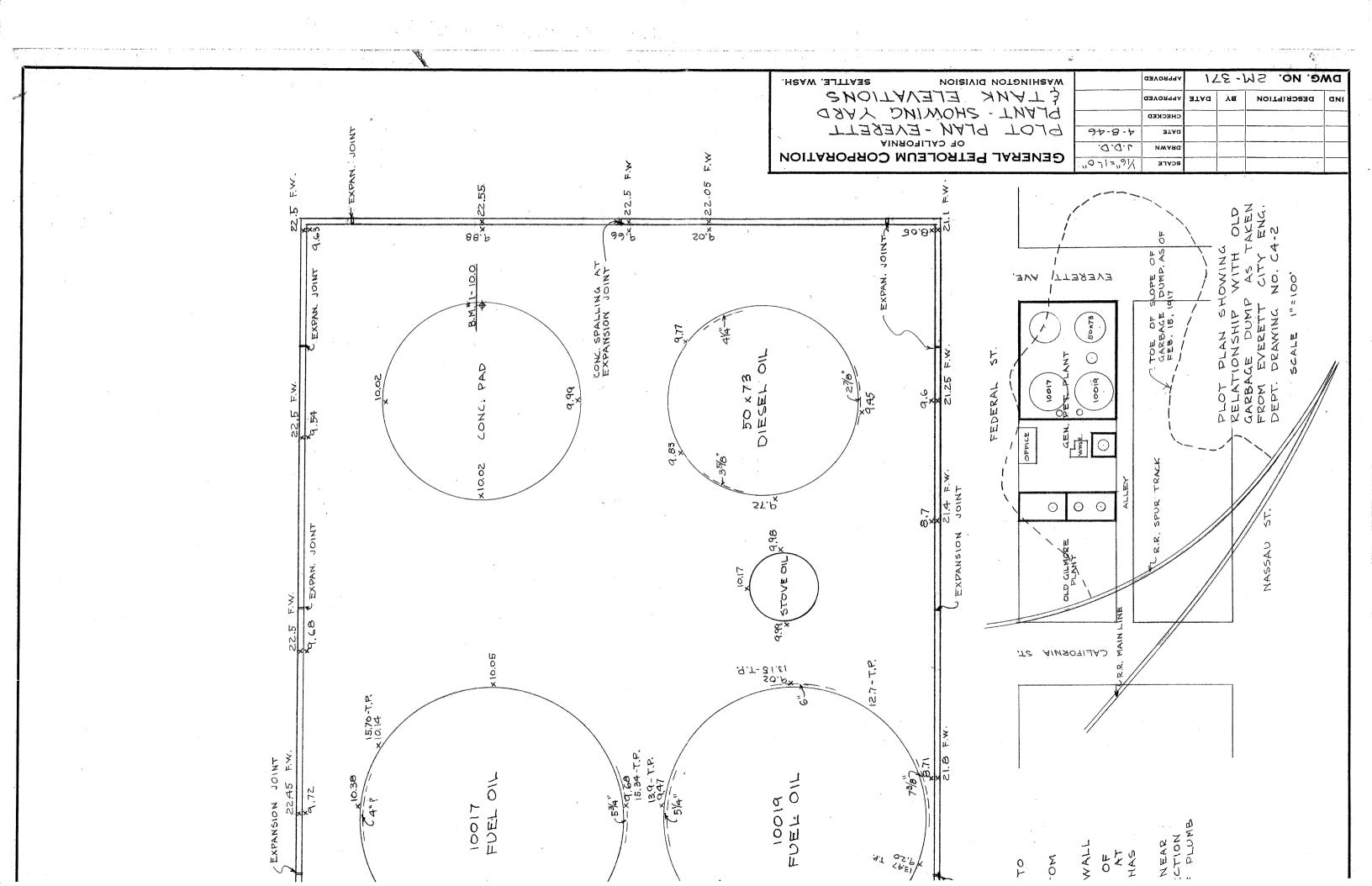
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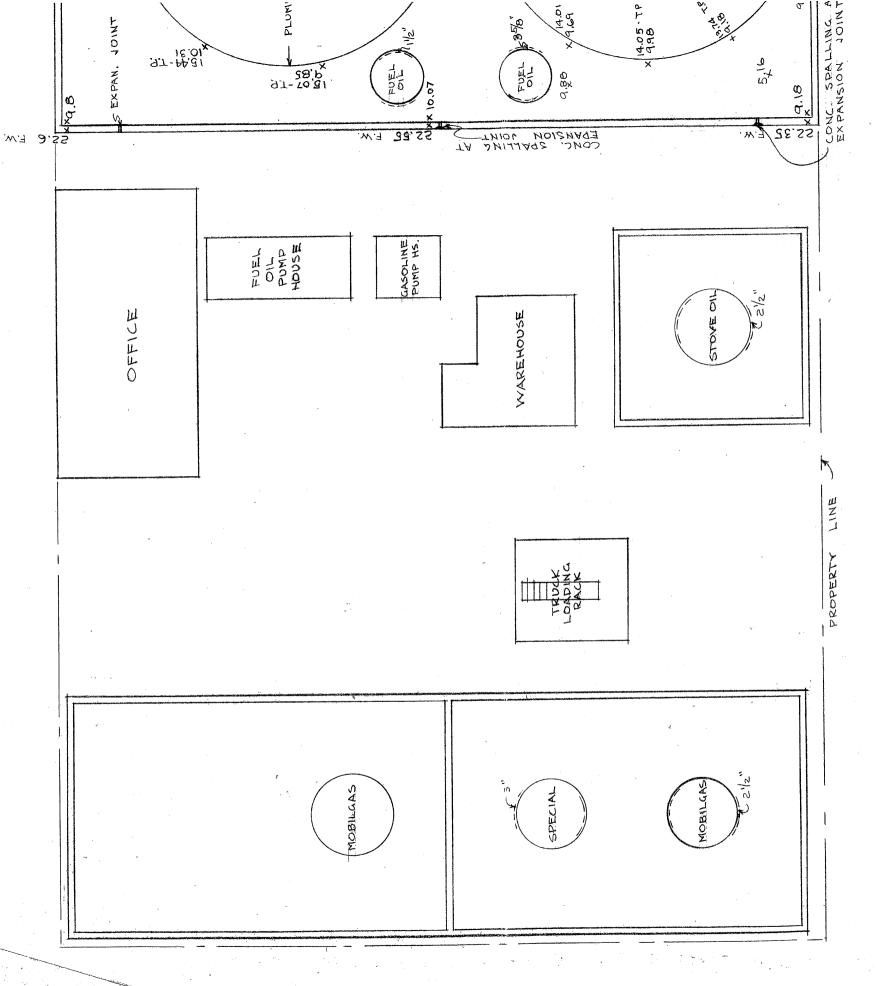
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EXHIBIT

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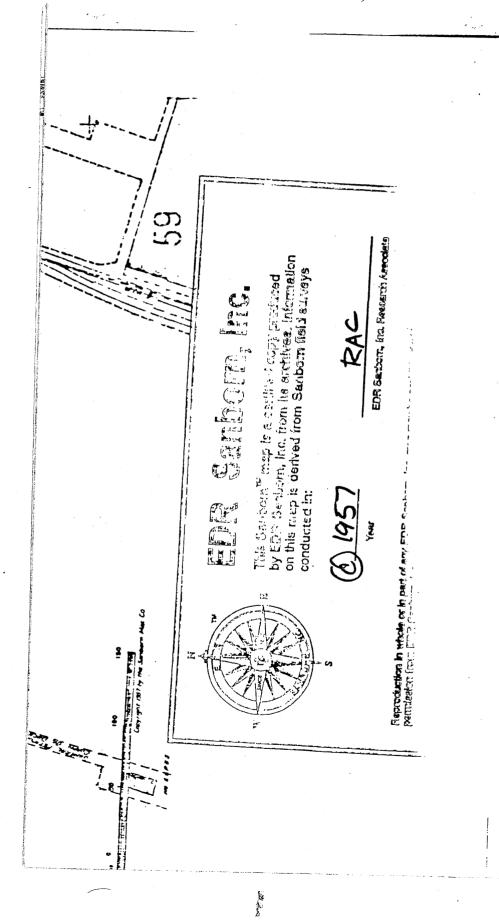
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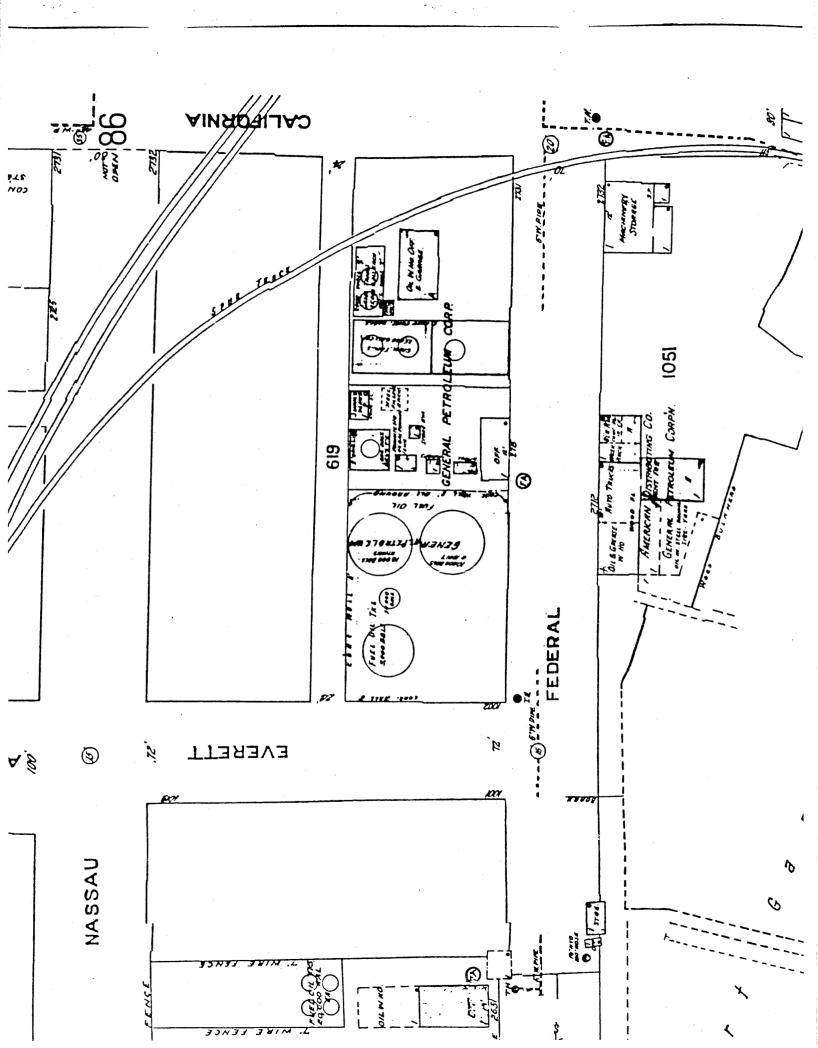
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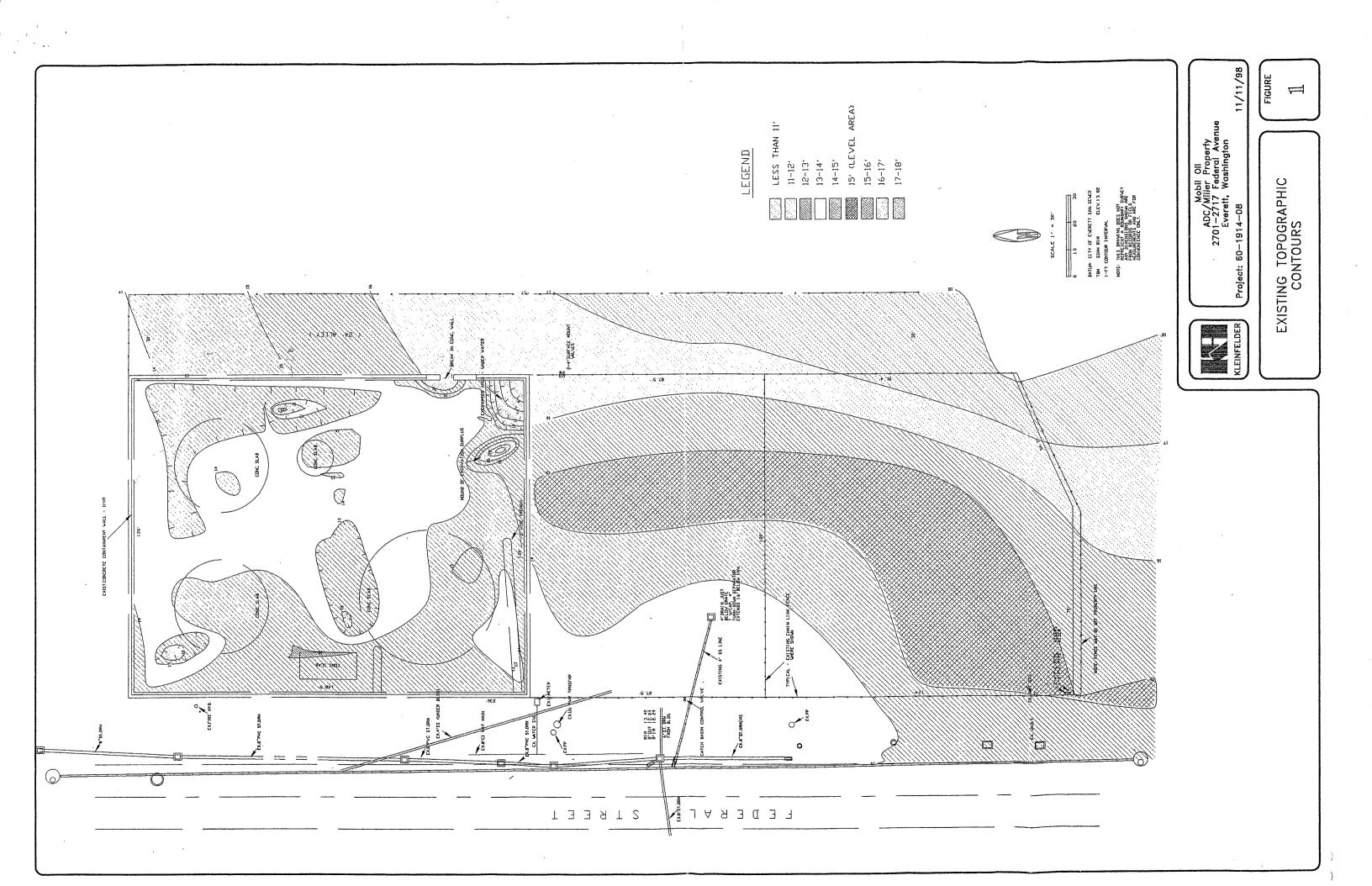
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December 27, 2006 6-914-15716-0

ExxonMobil–Global Remediation 4580 Klahanie Drive SE PMB 507 Issaquah, Washington 98029

Attention:

Mr. Tim Strawn

Subject:

Forensic Evaluation of Petroleum

Hydrocarbons ExxonMobil and ADC/Miller

Parcel

2717/2731 Federal Avenue

Everett, Washington

Dear Mr. Strawn:

AMEC Earth & Environmental, Inc. (AMEC) has prepared this letter in response to the request from ExxonMobil to review forensic data from NewFields Environmental Practice, LLC (NewFields) for the former Mobil Oil/American Distribution Corporation (ADC) Terminal at 2717/2713 Federal Avenue, Everett, Washington (the Site).

AMEC chemists reviewed the report titled *Chemical Characterization of NAPL Samples Former Mobil Oil Terminal (46-108), Everett, Washington* (NAPL Report), prepared by NewFields dated May 31, 2006, along with data supplied by NewFields from chemical analysis performed by Alpha Analytical Woods Hole Laboratory of Woods Hole, Massachusetts (AWHL). A copy of the New Fields report and AWHL data are attached as Exhibit 1. The NAPL Report presents an evaluation of data generated by AWHL for three light nonaqueous phase liquid (LNAPL) samples, designated MW-29, W-1, and W-2. Sample MW-29 and sample W-1 were collected from monitoring wells at the Site, while sample W-2 was collected from an off-site location. A map of the Site, showing the location of the groundwater monitoring wells is attached to this letter as Exhibit 2.

This review was performed by AMEC on behalf of ExxonMobil in order to evaluate whether findings presented in the NAPL Report were consistent with the analytical data from AWHL, and to identify whether the analytical data was suggestive of the possible presence of off-site sources of the petroleum hydrocarbons in LNAPL samples collected.

Based on examination of the data included with the NAPL Report, AMEC concludes that LNAPL samples collected from on-site wells MW-29 and W-1 are similar to each other, but different from LNAPL collected from off-site well W-2, and that the presence of LNAPL in W-2 is not a result of transport of petroleum hydrocarbons from the on-site wells, MW-29 and W-1, to the off-site well, W-2.



The remainder of this letter will present specific details of AMEC's evaluation of the NAPL Report. The associated data, as related to the visual examination of bulk composition using chromatograms from whole oil analysis LNAPL samples, and a discussion of the specific diagnostic ratios of biomarkers and sulfur-bearing compounds taken from the detailed chemical analyses performed by AWHL for Newfields (as shown in the NAPL Report) will also be presented.

Evaluation of Bulk Composition of LNAPLs from On-site and Off-site Wells

Based on AMEC's inspection of whole oil chromatograms from samples MW-29, W-1 and W-2, as presented in the Newfields Report (see Page 3 of Exhibit 1), the following conclusions about bulk composition of LNAPL from the three samples can be drawn:

- The two on-site LNAPL samples (MW-29 and W-1) appear to be predominantly mixtures
 of degraded diesel mixed with degraded gasoline and small amounts of residual-range
 hydrocarbons. The diesel-range chromatograms for the on-site samples exhibit a nontypical diesel pattern, which is likely the result of gasoline present in LNAPL and
 enhanced solubilization of organic materials from the surrounding soil caused by the
 gasoline, as opposed to straight diesel.
- LNAPL from the off-site sample (W-2) appears to consist predominantly of highly degraded diesel with only a trace amount of gasoline. Based on visual examination of the whole oil chromatograms, the diesel in sample W-2 appears much more degraded than the diesel in the on-site samples, and is likely from a much older release.
- NAPL samples from MW-29, W-1, and W-2 all contain residual-range hydrocarbons. No
 quantitative results for gasoline, diesel, or residual-range petroleum hydrocarbons were
 included in the NAPL report, but based on visual examination of the whole oil
 chromatograms, relative concentrations of residual-range hydrocarbons appear to be
 higher in the on-site samples (MW-29, and W-1) than the off-site sample (W-2), possibly
 due to enhanced solubilization of asphalt or other high molecular weight petroleum
 hydrocarbons from soil or fill due to the presence of gasoline.
- In the professional opinion of AMEC, based on the visual inspection of the two Total Petroleum Hydrocarbon (TPH) chromatograms for MW-29 and W-1, LNAPL collected from MW-29 appears less degraded than LNAPL collected from W-1. LNAPL collected from MW-29 also appears to have a higher abundance of gasoline-range compounds relative to diesel-range compounds than LNAPL collected from MW-1. As stated above, both on-site LNAPL samples appear to be less degraded than LNAPL collected from offsite well W-2.



Examination of Diagnostic Ratios Related to Sulfur Content, and Select Biomarkers

The most direct evidence that LNAPL samples collected from on-site wells MW-29 and W-1 are similar to each other, but different from LNAPL collected from off-site well W-2, involves comparison of relative sulfur concentrations in LNAPLs from the three wells using diagnostic ratios of the concentrations of dibenzothiopenes (sulfur-containing polycyclic aromatic hydrocarbons [PAH] analogs) to phenanthrenes (sulfur-free PAHs). In the NAPL Report, ratios of C₂-substituted dibenzothiopenes to the sum of C₂-substituted dibenzothiopenes and C₂-substituted phenanthrenes were plotted against ratios of C₃-substituted dibenzothiopenes to the sum of C₃-substituted dibenzothiopenes to the sum of C₃-substituted dibenzothiopenes C₃-substituted phenanthrenes in order to allow comparison of relative sulfur abundances between the three LNAPL samples. The resulting plots (see Exhibit 1, page 6, Figure 3) demonstrate that LNAPL samples collected from MW-29 and W-1 had sulfur abundances similar to each other, but distinct from, and lower than, the sulfur abundance for LNAPL collected from W-2. Based on this analysis, LNAPLs in MW-29 and W-1 are derived from a petroleum source that has a lower sulfur concentration than the petroleum source from which LNAPL in W-2 is derived.

Alkylcyclohexanes are a family of petroleum constituents that are resistant to degradation, and that have been used as forensic markers in multiple investigations involving diesel fuels, as their concentration in diesel fuels is typically greater than the concentrations of many other biomarker families. Inspection of the m/z 83 ion chromatograms (see pages 33-36 of Exhibit 1), which corresponds to the molecular weight of the base ion for alkylcyclohexane compounds, also reinforces the assertion that LNAPL samples collected from MW-29 and W-1 are similar to each other, but distinct from LNAPL collected at W-2. The chromatographic traces from MW-29 and W-1 exhibited unresolved chromatographic envelopes (UCEs) with similar retention times, but slightly differing peak patterns. The peak pattern for LNAPL collected from MW-29 exhibits higher relative contributions by early-eluting peaks than the peak pattern from LNAPL collected at W-1, and although enhancement of lower molecular weight alkylcyclohexanes can sometimes be related to degradation of higher molecular weight alkylcyclohexanes (a sign of a more highly degraded material), the pattern of peaks in this case does not support that assertion, but is strongly indicative of a less degraded sample. The m/z 83 ion chromatogram for the LNAPL sample collected from W-2, on the other hand, shows nearly universal decreases in peak height for all the alkycyclohexanes compared to the matching peaks for sample MW-29 and W-1, again indicating that the diesel component of LNAPL in W-2 originated from an older release.

Retene is a naturally-occurring PAH often associated with coniferous resins or other higher plant matter. The retene concentration detected in the LNAPL collected from W-1 is more than two-fold higher than the retene concentration in LNAPL collected from MW-29, and more than four-fold higher than the retene concentration in LNAPL collected from W-2 (570 mg/kg in W-1 versus 230 mg/kg in MW-29 and 130 mg/kg in W-2). It is also inconsistent with the retene concentrations in these two samples. Considering the known disposal of wood waste on the Site, the anomalous retene concentration may be a result of solubilization of retene from wood waste by the mixture of



diesel fuel and gasoline, but it could also indicate that the diesel fuel contained in sample W-1 is derived from a source distinctly different from the diesel in LNAPL from MW-29.

Finally, as stated above, the gasoline and diesel in LNAPL collected from MW-29 appears less degraded than the gasoline and diesel in LNAPL collected from W-1. In addition, MW-29 is located at a distance from W-1 and near the upgradient side of the property. It is possible that the gasoline in LNAPL, collected from MW-29, originates from an off-site source.

In conclusion, based on examination of information provided in the NAPL Report, AMEC concludes that:

- 1) LNAPLs from MW-29 and W-1 are derived from sources with lower sulfur concentrations than the source from which LNAPL in W-2 is derived.
- 2) LNAPLs from MW-29 and W-1 consist predominantly of a mixture of weathered diesel and weathered gasoline, while LNAPL from W-2 consists predominantly of diesel fuel with small amounts of gasoline.
- 3) LNAPLs from all three locations contain small amounts of residual range petroleum hydrocarbons, which are likely related to solubilization of asphalt or other high molecular weight petroleum hydrocarbons from soil or fill at the site.
- 4) LNAPL in W-2 is more highly weathered, and therefore, likely older than LNAPLs in MW-29 and W-1.
- 5) LNAPL in W-1 contains two-fold higher levels of retene than LNAPL in MW-29, which may indicate different sources or may be the result of the presence of higher plant matter in the soil in the area in which W-1 is located.
- 6) LNAPL in W-1 contains anomalously high levels of decalins and C1-naphthalenes compared to LNAPL in MW-29, which suggests influence of a distinct source or release.
- 7) Diesel in LNAPL from MW-29 appears to be less highly weathered than the diesel in LNAPL from W-1, and LNAPL from MW-29 also contains more gasoline than LNAPL from W-1.

Chromatographic patterns, relative sulfur abundances, and PAH analyses all point to similarities between LNAPL collected from MW-29 and LNAPL collected from W-1, and differences between these LNAPLs and LNAPL collected from W-2. Samples MW-29 and W-1 appear to consist primarily of degraded mixtures of gasoline and diesel with a small residual-range component, while LNAPL collected from W-2 appears to be degraded diesel with trace amounts of gasoline-range and residual-range compounds. The diesel-range analytes in MW-29 and W-1 are similar enough to indicate a common original source, but are different enough to exclude a common release. The diesel-range analytes detected in W-2 are different from both MW-29 and W-1. AMEC was unable to evaluate the gasoline component of LNAPL samples because of a lack of additional analyses of gasoline-range organics.



ExxonMobil-Global Remediation December 27, 2006

6-914-15716-0 Page 5

Based on these conclusions and the location of MW-29, distant from W-1 and near the upgradient property boundary, the origin of at least some portion of LNAPL in MW-29 from a source distinct from W-1 cannot be ruled out. If viable third-party sources can be identified in the vicinity of W-1 or W-29, AMEC recommends that Exxon-Mobil/ADC may wish to consider the acquisition of new LNAPL samples from wells at the Site, and analysis of a forensic suite that includes analyses that will yield more information related to the gasoline-range component of LNAPL.

If you have any questions or require further information, please do not hesitate to contact us.

Sincerely,

AMEC Earth & Environmental, Inc.

Sean Gormley, EAC, CHMM Chemist

sea.gormlev@amec.com

Senior Associate/Environmental Chemist

Meg Strong

meg.strong@amec.com

L.G. Senior Technical Manager

CC:

William Joyce, Salter Joyce Ziker PLLC Diana Martin, Bingham McCutchen, LLP

ENVIRONMENTAL CHEMISTS

Andrew John Friedman James E. Bruys, Ph.D. (208) 285-8282.

3012 16th Avenue West Seattle, WA 98119-2029 FAX: (206) 283-5044

November 27, 1995

Tim Peter, Project Leader AGRA Earth & Environmental, Inc. 11335 NE 12204 Way, Suite 100 Kirkland, WA 95034-6918

Dear Mr. Poter:

Enclosed are the results from the testing of material submitted on November 22, 1995 from your 11-04558-07 project.

Samples MW-30 and MW-29 contained a heavy fuel oil such as Bunker C, or alternatively, a weathered crude oil. The two samples were very similar, and could easily be from the same source. Sample B-1 contained a heavily westbered Diesel fuel or heating oil. B-1 did not contain the high boiling fraction seen MW-29 and MW-30.

Sample Marihole appeared to contain the water soluble fraction of a middle or heavy petroleum distillate. The GC/FID trace showed patterns of C3-benzenes, naphthalene, methylnaphthalenes, and dimethylnaphthalenes. These components tend to be the more water soluble fraction of middle and heavy distillates. A small amount of whole product may also be present, but the water soluble compounds dominate the GC/FID trace.

MW-29, MW-30 and B-1 may have all been sources to Machole. It is also possible that Manhole has an entirely different source, origin unknown.

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

Sincerely,

FRIEDMAN'S BRUYA, INC.

Beth Albertson Chemist

keh Enclosures FAX: 821-3814 AEE127RD00

ENVIRONMENTAL CHEMISTS

Date of Report: November 27, 1995 Date Received: November 22, 1995

Project: 11-04558-07

Date Samples Extracted: November 24, 1995

RESULTS FROM THE ANALYSIS OF PRODUCT SAMPLES
FOR FINGERPRINT CHARACTERIZATION
BY CAPILLARY GAS CHROMATOGRAPHY
USING A FLAME IONIZATION DETECTOR (FID)
AND ELECTRON CAPTURE DETECTOR (ECD)

Sample III

B-1

GC Characterization

The GC trace using the flame ionization detector (FID) showed the presence of medium balling compounds. The patterns displayed by these peaks are indicative of diesel fuel or heating oil.

The medium boiling compounds appeared as a pattern of peaks eluting from n-C6 to n-C24 showing a maximum near n-C17. The material appears to have undergone chemical/biological degradation due to the presence of a broad unresolved hump of peaks and to the loss of the n-alkane peaks.

The large peak seen near 25 minutes on the GC/FID trace is pentagosane, added as a quality assurance check for this GC analysis. There is a second internal standard peak seen on the GC/ECD trace at about 26 minutes which is dibutyl chlorendate.

The GC trace using the flame ionization detector (FID) showed the presence of low, medium and high boiling compounds. The patterns displayed by these peaks are indicative of a heavy fuel oil such as Bunker C or a crude oil.

The low, medium and high boiling compounds appeared as a ragged pattern of peaks eluting from n-C6 to n-C84 showing a maximum near n-C17. A lack of a dominant pattern of n-alkanes was seen. n-Alkanes are preferentially consumed by microorganisms, and a lack of n-alkanes may be correlated to biological weathering.

The large peak seen near 25 minutes on the GC/FID trace is pentagosane, added as a quality assurance check for this GC analysis. There is a second internal standard peak seen on the GC/ECD trace at about 26 minutes which is dibutyl chlorendate.

MW-30

ENVIRONMENTAL CHEMISTS

Date of Report: November 27, 1995 Date Received: November 22, 1995

Project: 11-04558-07

Date Samples Extracted: November 24, 1995

RESULTS FROM THE ANALYSIS OF PRODUCT SAMPLES
FOR FINGERPRINT CHARACTERIZATION
BY CAPILLARY GAS CHROMATOGRAPHY
USING A FLAME IONIZATION DETECTOR (FID)
AND ELECTRON CAPTURE DETECTOR (ECD)

Sample ID

MW-29

GC Characterization

The GC trace using the flame ionization detector (FID) showed the presence of low, medican and high boiling compounds. The patterns displayed by these peaks are indicative of a heavy fuel oil such as Bunker C or a crude oil.

The low, medium and high boiling compounds appeared as a ragged pattern of peaks eluting from n-C6 to n-C34 showing a maximum near n-C17. A lack of a dominant pattern of n-alkanes was seen. n-Alkanes are preferentially consumed by microorganisms, and a lack of n-alkanes may be correlated to biological weathering. The material present is very similar, though not identical, to the product in MW-30.

The large peak seen near 25 minutes on the GC/FID trace is pentagosane, added as a quality assurance check for this GC analysis. There is a second internal standard peak seen on the GC/ECD trace at about 26 minutes which is dibutyl chlorendate.

ENVIRONMENTAL CHEMISTS

Date of Report: November 27, 1995 Date Received: November 22, 1995

Project: 11-04558-07

Date Samples Extracted: November 24, 1995

RESULTS FROM THE ANALYSIS OF WATER SAMPLES
FOR FINGERPRINT CHARACTERIZATION
BY CAPILLARY GAS CHROMATOGRAPHY
USING A FLAME IONIZATION DETECTOR (FID)
AND ELECTRON CAPTURE DETECTOR (ECD)

Sample II)

GC Characterization

Manhole

The GC trace using the flame ionization detector (FID) showed the presence of medium builing compounds. The patterns displayed by these peaks are indicative of the water soluble fraction of a petroleum product.

The medium boiling compounds appeared as a ragged pattern of peaks cluting from n-Ce to n-C22 on the GC/FID trace. An irregular pattern of n-alkanes is seen from n-C11 to n-C19. n-Alkanes have poor solubility in water. It is possible that small amounts of whole product are mixed into the water phase. The major peaks seen between eight and fourteen minutes are likely to be alkylated benzenes, naphthalene, and alkylated naphthalenes. These compounds typically dominate the water soluble fraction of diesels and heavy heating oils. The material present was seen in low concentration, making product identification tentative. The detection limit for this analysis is 200, 400 and 800 ppb (µg/L) for gasoline, diesel and motor oil, respectively.

The large peak seen near 25 minutes on the GC/FID trace is pentacosane, added as a quality assurance check for this GC analysis. There is a second internal standard peak seen on the GC/ECD trace at about 26 minutes which is dibutyl chlorendate.

NRW-1

The GC trace using the flame ionization detector (FID) and the GC electron capture detector (ECD) trace showed an absence of volatile and semi-volatile compounds. The detection limit for this analysis is 500, 1,000, and 2,000 ppb (µg/L) for gasoline, diesel and motor oil respectively.



18939 120th Avenue N.E., Suite 101 • Bothell, WA 98011-9508 East 11115 Montgomery, Suite B • Spokane, WA 99206-4776 9405 S.W. Nimbus Avenue + Beavenon, OR 9/008-7132

(208) 481-9200 - FAX 485-2992 (509) 924-9200 • FAX 924-9290

(503) 643-9200 • FAX 644-2202

11335 NE 122nd Way, #100

Sample Matrix:

AGRA Earth & Environmental Client Project ID: Mobil Everett Analyzed: Nov 26-27, 1995

Attention: Tim Peter First Sample #: B511431-02 Reported: Nov 27, 1995

TOTAL PETROLEUM HYDROCARBONS-GASOLINE RANGE

Sample Number	Sample Description	Sample Result µg/L (ppb)	Surrogate Recovery %	
B511431-02	te-ww	N.D.	80	
B511431-03	WM-33	N.D.	80	
B511431-04	MW-96	N.D.	60	
B511431-05	MW-32	N.D.	84	
8511431-06	MW-8	N.D.	85	
B511431-07	MW-18	N.D.	86	
B611431-08	P-2	N.D.	88	
8511431-09	MW-18	4,800	Ş-2	
B511431-10	MW-17	N.D.	92	Samuel Control of the Control
B511431-11	MW-18	4,000 G-1	8-2	

Reporting	Limit:
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50

4-Bromofluorobanzene surrogate recovery control limits are 50 - 150 %. Volatife Total Petroleum Hydrocarbone are quantitated as Gasoline Rarige Organics (toluene - dedecane). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CREEK ANALYTICAL Inc. Picese Note:

5-2 - The Stirrogate Recovery for this sample cannot be accurately quantified due to interference from coeluting organic compounds present in the sample.

511431,AGR 43> Good Manager



19939 120th Avenue N.E., Suite 101 • Bothes, WA 98011-9508 East 11115 Montgumery, Suite B . Spokane, WA 99298-4776 3406 S.W. Nimbus Avenue • Beaverton, OR 97008-7132

(206) 401-9200 - FAX 485-2992 (500) 924-9200 • FAX 924-9290

(503) 643-9200 • FAX 544-2202

11335 NE 122nd Way, #100

Sample Matrix:

Received: Nov 22, 1995 Analyzed: Nov 26-27, 1995

Attention: Tim Peter First Sample #: B511491-12 Reported: Nov 27, 1995 TOTAL PETROLEUM HYDROCARBONS-GASOLINE RANGE

Sample Description	Sampl≠ Result µg/L (ppb)	Surrogate Recovery %
B-WM	110	105
WM-a	N.D.	88
MW-27	160 @-1	92
WW-28	N.D.	86
MW-10 11/22/98	1,300	\$-2
MW-11 11/32/95	79 0	S-2
MW-12 N.D.		83
MW-15 11/22/95	120	95
MW-85 - 11/22/95	N.D.	77
MW-37	, N.D.	7 0
	MW-8 MW-8 MW-9 MW-27 MW-28 MW-10 11/22/96 MW-11 11/32/95 MW-12 11/22/95 MW-15 11/22/95	Description Result

Reporting Limit			50
A inthan and			,

4-Bromofluorobanzene surrogate recovery control limits and 50 - 150 %.

Volatile Total Petroleum Hydrocarbons are quantitated as Gasoline Range Organics (toluene - dedecane). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CHEEK ANALYTICAL Inc. Please Note:

S-2 = The Surrogate Recovery for this sample cannot be accurately quantified due to interference from coaluting organic compounds present in the sample.

Shannon Stowell Project Manager

511431.AGH <4>



18939 120th Avenue N.E., Suite 101 • Bothell, WA 98011-9508 East 11115 Montgomery, Suite B • Spokene, WA 99206-4778

9405 S.W. Nimbus Avenue * Beaverton, OR 97008-7132

(206) 481-9200 • FAX 485-2992 (509) 924-9200 + FAX 924-9290 (503) 643-6200 • FAX 644-2202

AGRA Earth & Environmental Client Project ID: Mobil Everett 11335 NE 122nd Way, #100 Attention: Tim Peter First Sample #: BLK112695 Reported: Nov 27, 1995

Method Blank

Sample Matrix:

WTPH-G

Analyzed: Nov 28-27, 1995]

TOTAL PETROLEUM HYDROCARBONS-GASOLINE RANGE

Sample Number	Sample Description	Sample Result µg/L (ppb)	Surrogate Recovery %
BLK112695	Method Blank	N.D.	78

Reporting Umit:

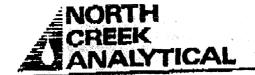
50

4-Bromofluorobenzene surrogate recovery control limits and 50 - 150 %. Volatile Total Petroleum Hydrocustions are quantitated as Gasoline Range Organica (toluene - dodecane). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CREEK ANALYTICAL Inc.

Shannon Stowell Project Manager

48× ADVIENTE



18909 120th Avenue N.C., Suite 101 + Bothall, WA 98011-9506 (206) 481-9200 = FAX 485-2992 Sast 11115 Mortgomery, Suite B + Spokene, WA 99208-4778 (509) 924-9200 + FAX 924-9290 (509) 645-9200 • FAX 644-2304 9405 S.W. Ninibus Avenue + Beaverton, OR 97008-7132

1335 NE 122nd Way, #100 Irkland, WA 98034

GRA Earth & Environmental Client Project ID: Mobil Everett Sample Matrix: Water Analysis Method: WTPH-G

Analyzed: Nov 26-27, 1995 paragraphic de la compansión de la compa

HYUROCARBON QUALITY CONTROL DATA REPORT

ACCURACY ASSESSMENT Laboratory Control Sample			•	RECISION ASSES Sample Duplicat	SMENT •
	Gasoline			Organics	
Spike Conc. Added:	100	•	Sample Number:	B511431-10	B611431-18
Spiko Result:	95		Original Result:	N.D.	N.D.
% Recovery:	95	•	Duplicat e Result:	N.D.	N.D.
Upper Control Limit %:	132		Relative % Difference	Relative Percent Differe reported at sample cond less than 10 times the P	SQUITETION REASIS
Lower Control Limit %:	56		Maximum RPD:	50	60

NORTH CREEK ANALYTICAL Inc.

Shamon Stowell Project Manager

Spike Result Spike Concentration Added × 100

Relative % Difference:

x 100

Original Result - Duplicate Result (Original Result + Duplicate Result) / 2

(206) 481-9200 • FAX 485-2992 (509) 924-9200 • FAX 924-9290 (503) 643-9200 + FAX 644-2202

11335 NE 122nd Way, #100 Attention: Tim Peter First Sample #: B511431-02 Reported: Nov 27, 1995

Sample Matrix:

AGRA Earth & Environmental Client Project ID: Mobil Everett Analyzed: Nov 26-27, 1995

BTEX DISTINCTION

	•	D:	10 (11 d		•		
Sample Number	Sample Description	Benzene µg/L (ppb)	Taluene µg/L (ppb)	Ethyl Benzene µg/L (ppb)	Xylenes µg/L (ppb)	Surrogate Recovery %	
B511431-02	MW-31	N.D.	N.D.	N.D.	N.D.	76	
B511431-03	MW-33	N.D.	N.D.	N.D.	N.D.	74	
B511431-04	MW-36	N.D.	N.O.	Ņ.Ď.	N.D.	73	
B511431-05	MW-32	N.D.	N.D.	N.D.	N.D.	76	,
B511431-06	B-WM	. N.D .	N.D.	N.D.	N.D.	7 8	•
B511431-07	MW-16	N.D.	N.U.	N.D.	Ŋ,D.	80	
B511431-08	8-2	0.78	N.D.	N.D.	N.D.	ध०	
B511431-09	MW-16	640	9.8	26	140	127	
B511431-10	MW-17	- 66	0.53	N.O.	N.D.	78	
D\$11431-11	MW-18	170	N.D. (F.L. = 2.0)	5.8	3.7	105	
leporting Limit	8:	0.50	0.50	0.50	1.0		

4-Bromofluorobenzene surrogate recovery control limits are \$9 - 144 %. Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH CREEK ANALYTICAL Inc.

Shapport Stowell Project Manager



(206) 481-9200 + FAX 485-2892 19930 120th Avenue N.E. Suite 101 • Botnell, WA 98011-9308 East 11115 Montgomery, Suite B • Spokeno, WA 99206-4776 gane S.W. Nimbus Avenue + Degreton, OR 97008-7132

(609) 024-9200 - FAX 924-9290 (500) 543-8200 - FAX 544-2202

AGRA Earth & Environmental Client Project ID: Mobil Everett 11335 NE 122nd Way, #100 Kirkland, WA 98034 Attention: Tim Peter First Sample #:

Sample Matrix:

Analysis Method:

EPA 8020

Nov 22, 1995

Analyzed: Nov 26-27, 1995 Nov 27, 1995 Reported: sentanti sa paga sa masa na masa na manga na manga na manga na manga na manga na manga na manga na manga na ma

BTEX DISTINCTION

		BIEY	Net filikara.				
Sample Number	Sample Description	Benzen e µg/L (ppb)	Toluene ug/L (ppb)	Ethyl Benzeñe µg/L (µpb)	Xylenes µg/L (ppb)	Surrogate Recovery %	
B511431-12	MW-B	7.7	N.D.	N.D.	N.D.	88	
B611431-13	MW-8	1,3	N.D.	N.D.	N.D.	79	
	MW-27	N.D.	N.D.	N.D.	N.D.	83	
B511431-14	MW-28	N.D.	N.D.	N.D.	N.D.	79	
B511431-15	MW-10	1.3	N.D.	N.D.	2.0	S-2	·
B511431-16	1 1/22/95 MW-11	36	0.80	1.8	1,8	109	•
B511431-17	11/22/98 MW-12	9.2	N.D.	N.D.	1.0	77	·
B511431•18	11/22/95 MW-13	5.2	N.D.	N.D.	N.D.	88	• .
B511431-19	11/22/98 MW-35	2.7	N.D.	N.D.	1.7	74	
B811431-20	11/22/95 MW-87	0,50	N.D.	N.D.	N.D.	69	
B511431-21	WAAAOI				1.0		Bankier
Reporting Limit	s:	0. 5°	0.50	0.50			

4-Bromofluorobenzene surrogate recovery control limits and 50 - 142 %. Analytes reported as N.D. were not detected above the stat. a Limit.

NORTH CREEK ANALYTICAL Inc. Please Note:

Shannon Slowell

Project Manager

5-2 - The Surrogate Recovery for this for

and he accurately quentified due to interference went in the sample.

from cos ing orga



18939 120th Avenue N.E., Suttle 101 • Bothell, WA 98011-9505 (206) 481-9200 • FAX 485-2992 East 11115 Montgomery, Suite B + Spokerio, WA 99209-4776 (503) 543-9200 + FAX 644-9202 8405 8.W. Nimbus Avenue + Beaverton, OR 97008-7132

11335 NE 122nd Way, #100

Sample Matrix: Water Analysis Method: EPA 8020

apprend begrande de la company Nov 26, 1995

ALEMBOR: THE FELT OC Sample #: B511431-02

Reported: Nov 27, 1998

Reported: Nov 27, 1998

Reported: Nov 27, 1998

Project Mans.

Analyzed:

MATRIX SPIKE QUALITY CONTROL DATA REPORT

							ı
Berzol/e	Toluené	Ethyl Benzans	Xylenes				_
N.D.	N.O.	N.D.	N.D.		٠.		
10.0	10.0	10.0	30.0				
9.7	9.5	9.9	31.4		•		
87 %	95%	99%	105%				
9.4	9,83	9.6	30.5				•
94%	96%	96%	102 %				
115	110	122	122	•			
82	81	8 5	.85				
3.1%	1.4%	3.1%	2,9%				
16	18	16	1/	- 6	¥ 100		فنبين
FRICA: I	1.5%	- 8p	ks Result - Sampi	a Masuit	A 144	•	
1 - 1 BALL	4	: Spl			x 100		 >
	10.0 9.7 97% 9.4 115 82 3.1%	N.D. N.O. 10.0 10.0 9.7 9.5 97% 95% 9.4 9.63 94% 98% 115 116 82 81 3.1% 1.4% 16 18	Berzene Toluene Benzane N.D. N.D. 10.0 10.0 9.7 9.5 9.8 99% 9.4 9.63 9.6 96% 116 110 122 82 81 85 3.1% 1.4% 3.1% 16 18 16 200 16 16	N.D. N.O. N.D. N.D.	N.D. N.D. N.D. N.D.	N.D. N.O. N.D. N.D.	N.D. N.O. N.D. N.D.



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Surrogate

(206) 481-9200 + FAX 485-X962 (509) 924-9200 • FAX 924-9290 (303) 643-9200 + FAX 644-2202

11335 NE 122nd Way, #100 Kirkland, WA 98034

Sample Matrix: Analysis Method:

First Sample #:

WTPH-D Extended B511431-02

negation production and the second se Nov 22-26, 1995 Analyzed: Nov 26-27, 1995

Nov 27, 1995 Reported:

TOTAL PETROLEUM HYDROCARBONS - DIESEL RANGE EXTENDED

Heavy Qil

Sample Number	Sample Description	Dlesel Result mg/L (ppm)	Heavy Oil Result mg/L (ppm)	Recovery %			
B511431-02	MW-31	0.47	N.D.	79			
B511431-03	WM-83	0.79	N.D.	81			
B511431-04	MW-36	0.71	N.Ď.	76			
B511431-05	WM-38	0,40	N.D.	78	•		
B511431-06	MW-8	0.80	1.4	72.		·	
B511431-07	MW-18	0.77	1.2	74		•	
B511431-08	B-2	4.4	3.9	ВО			
B511431-09	MW-18	1.7 D-1	1.7	83		•	
B511431-10	MW-17	0,49	0.97	81	,		
B611431-11	MW-18 .	18	4.4) 111 	- 177 - 177	-	1
Reporting Lim	it:	0.25	0.75				

Extractable Hydrocarbons are quantitated as Dieset Range Organics (C12 - C24) and Heavy Oil Range Organics (>C24). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH-OREEK ANALYTICAL Inc.

Shannon Stowell Project Manager

(205) 481-9200 • FAX 485-2992 (509) 824-9200 = FAX 924-9290

(509) 843-9200 • FAX 844-2207 3405 S.W. Nimbus Avenue • Beaverton, OR 97009-7132

11335 NE 122nd Way, #100 Kirkland, WA 98034 Attention: Tim Peter

Sample Matrix: Analysis Method:

First Sample #:

Water WTPH-D Extended

B511431-12

AGRA Earli & Environmental Client Project ID: Mobil Everett Nov 22, 1995

Extracted: Nov 22-26, 1996 Analyzed: Nov 26-27, 1996

Nov 27, 1995 Reported:

. opendo. Nov 27, 1903 p TOTAL PETROLEUM HYDROCARBONS - DIESEL RANGE EXTENDED

Sample Number	Sample Description	Diesel Result mg/L (ppm)	Heavy Oil Result mg/l. (ppm)	Surrogate Recovery %		
B511431-12	MW-8	8.3	3.1	91		
B511431-13	MW-B	3.3	3,3	90		
B511431-14	MW-27	4.7	4.4	98		
B611431-15	MW-28	3.4	3,7	94		
₿511431•16	MW-10 11/22/95	4.2	6.8	84		
B611431-17	MW-11 11/22/95	2.4	1.2	93		
B511431-18	MW-12 11/22/95	2.1	3.6	84		
B511431-19	MW-13 11/22/95	6.7	3.1	98	· .	
B511431-20	MW-38 11/22/96	0.33	1.1	93	·	
B511431-21	MW-37	1.6	2.4	84		1
Reporting Limit		0.25	0.75			

2-Pluoroblphenyl surrogate recovery control limits are 50 - 150%. Extreosable Hydrocarbone are quantitated as Diesel Range Organics (C12 - C24) and Heavy Oil Range Organics (>C24). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NOBTH-CREEK ANALYTICAL Inc.

Project Manager



10939 120th Avenue N.E., Suite 101 • Bothell, WA 980 11-9508 East 11115 Montgomery, Suite B • Spokane, WA 99206-4778-9405 S.W. Nimbus Avanue & Beaverton, OR 97008-7132

(206) 481-9200 + FAX 485-2992 (509) 924-9200 • FAX 924-9290 (503) 643-9200 • FAX 644-2202

335 NE 122nd Way, #100 rkland, WA 98034

Sample Matrix: Analysis Method: First Sample #:

WTPH-D Extended BLK112295

A Earth & Environmental Client Project ID: Mobil Everett Extracted: Nov 22-28, 1995 Analyzed: Nov 26-27, 1995 Nov 27, 1995 Reported:

Tabolisa in a second de la company de la company de la company de la company de la company de la company de la TOTAL PETROLEUM HYDROCARBONS - DIESEL HANGE EXTENDED

Sample Number	Sample Description	Diesel Result mg/L (ppm)	Henvy Oil Result mg/L (ppm)	Surrogate Recovery %
BLK112295	Method Blank	N.D.	N.D.	84
BLK112695	Method Blank	N.D.	N.D.	85

Reporting Limit:

0.25

0.75

Extractable Hydrocarbons are quantitated as Diseal Range Organics (C12 - C24) and Heavy Oli Range Organics (>C24). Analytes reported as N.D. were not detected above the stated Reporting Limit.

NORTH-CREEK ANALYTICAL Inc.

Project Manager



19939 120th Avenue N.E., Suite 101 + Bothell, WA 98011-9508 (206) 481-9200 • FAX 485-2992 East 11115 Montgomery, Suite 8 • Spokers, WA 99208-4776 (509) 924-9200 • FAX 924-9290 9405 S.W. Nimbus Avenus • Beaverton, OR 97008-7133

11335 NE 122nd Way, #100

Lower Control

Limit %:

and propagation of the second Analysis Method: WTPH-D

Analyzed: Nov 26-27, 1995

HYDROCARBON QUALITY CONTROL DATA REPORT PRECISION ASSESSMENT

ACCURA(Laborato	CY ASSESSMEN TY Control Samp	T'	Sample Duplicat Diesel Hange Organics	Diesel Hange Organics
	Diesel			
Spike Conc. Added:	2.04	\$a Nu	mple mber: 8511431-09	B511398-02
Spik# Result:	1.91	Or H	riginal asult: 1,7	1.9
% Recovery:	94	Ħ	iplicate Jesult: 1,4 Relative Relative Percent Diffe	2.2
Upper Control Limit %:	107	% Di	ifference: reported at sample co less than 10 times the	neporting Limit.
		M	laximum	44

NORTH CREEK ANALYTICAL Inc.

Shannon Stowell Project Manager

69

% Recovery.

Spiko Flecult Spike Concentration Added

RPD:

X 100

x 100

Relative % Difference:

Original Result - Duplicate Result (Original Result + Duplicate Result) / 2

511431.AGR <145 -



(206) 481-9200 • FAX 485-2997 18939 120th Avenue N.E., Suite 101 + Botherl, WA 98011-9508 (509) 924-9200 - FAX 924-9290 East 11115 Montgomery, Suite B - Spokane, WA 99206-4776 (503) 643-9200 • FAX 644-2202 9405 S.W. Himbus Avenue • Beaverton, OR 97008-7132

VGRA Earth & Environmental Client Project ID: Mobil Everett 1335 NE 122nd Way, #100 Kirkland, WA 98034

Sample Mainx: Water Analysis Method: WTPH-D

Units: mg/L (ppm)

Nov 26, 1995 Extracted:

Analyzed: Nov 28-27, 1995 Reported: Nov 27, 1995

HYDROCARBON QUALITY CONTROL DATA REPORT

PRECISION ASSESSMENT ACCURACY ASSESSMENT Sample Duplicate Laboratory Control Sample Diesel Hange Organics Diesel **Sample** Number: B511431-19 Spike Conc. 2.04 Added: Original Spike 6.7 Result: 1.61 Result: Duplicate 5.7 Result: 79 Recovery: Relative **Upper Control** 16 % Difference: 107 Limit %: Maximum Lower Control 44 RPD: 69 Limit %:

NORTH CREEK ANALYTICAL Inc.

Shannon Stowell Project Manager % Recovery:

Solke Remait Spike Concentration Added x 100

Relative % Difference:

Original Result - Duplicate Resul (Original Result + Duplicate Result) / 2 x 100

511431.AGR x15>

18939-120th Avenue N.E., Suite 101 + Bother, WA 98011-9505 (206) 481-9200 • FAX 485-2992 East 11115 Montgomery, Suite B + Spokane, WA 99206-4776 (509) 924-9200 + FAX 924-9290 94US S.W. Nimbus Avenus • Requerton, OR 97008-7132 (503) 843-9200 • FAX 644-2202

HYDROCARBON ANALYSIS FOOTNOTES

2/94, Rev. 3

VOLATILE HYDROCARBONS - G	ASOLINE RANGE ORGANICS
---------------------------	------------------------

- This sample appears to contain extractable diesel range organics. G 1
- The chromatogram for this sample does not resemble a typical gasoline pattern. Please refer to the sample G 2 chromatogram.
- The total hydrocarbon result usualls sample is primarily due to an individual compound(s) eluting in the volatile hydrocarbon range. Identification and quantitation by EPA 8010, 8021 or 8240 is recommended. G 3
- This sample commins compound(s) not identified as Benzene, Toluene, Ethyl benzene of Xylene. () *
- This sample appears to contain or be saturated with gasoline product. G 5

EXTRACTABLE HYDROCARBONS - DIESEL RANGE ORGANICS

- This sample appears to contain volatile gasoline range organics. D 1
- The hydrocarbons present in this sample resemble heavy, non-resolvable oil range organics. Quantitation by D 2 TPH-Diesel Extended or TPH 418.1 is recommended.
- The hydrocarbon concentration result in this sample is partially due to an individual peak(s) eluting in the D 3 diesel / motor oil carbon range.
- The hydrocarbons present in this sample are a complex mixture of diesel range and heavy oil range organics. D4 -
- The hydrocarbon result shown is an estimated (greater than) value due to the high concentration. Reanalysis is being performed to yield a quantitative result. An amended report will follow. D 5
- The sample chromatographic pattern does not resemble the fuel standard used for quantitation. A fuel fingerprint is advised.

D 6	The sample chromatographic pattern assets in advised.		
D 7	This sample appears to contain or be saturated with diesel product.	Oils and Lubricants]
•		TRPH 418.1	
	Diesel & Fuel Oils		
	Extractable Hydrocarbons (IPH-D)	•	
	Gasoline	•	

Volatile Hydrocarbons (TPH-G)

MOI

HYDROCARBON BOILING POINT RANGE MEDIUM TO HIGH MEDIUM LOW TO MEDIUM

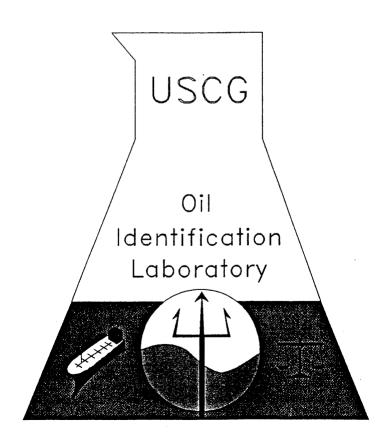
VERY HIGH

6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31+ CARBON RANGE:

OIL SAMPLE ANALYSIS REPORT

MARINE SAFETY OFFICE PUGET SOUND CASE NUMBER MC95015622

MARINE SAFETY LABORATORY CASE NUMBER 96-013





Commanding Officer
U. S. Coast Guard
Marine Safety
Laboratories

1082 Shennecossett Road Groton, CT 06340-6094 Phone: (860) 441-2645 Fax: (860) 441-2641

16400

OCT 1 8 1995

From: Commanding Officer, Marine Safety Laboratories

To: Commanding Officer, Marine Safety Office Puget Sound

Subj: OIL SAMPLE ANALYSIS REPORT, MSO PUGET SOUND CASE# MC95015622

MSL CASE #96-013

1. The laboratory analysis of this case has been completed and our report is forwarded. The technical data supporting the report (spectrograms and chromatograms) have been archived at our facility and are available upon request. We will maintain the oil samples in refrigerated storage pending final case disposition.

2. Questions concerning this report or the analytical methods used should be directed to the Supervisor of Analysis, Dr. Hendrick.

M. S. HENDRICK
By direction

Marshad Hendrick

Encl: (1) MSL Report 96-013

(2) OIS Addendum

UNITED STATES COAST GUARD OIL IDENTIFICATION LABORATORY

OIL SPILL IDENTIFICATION REPORT

LABORATORY CASE NUMBER: 96-013

REQUESTOR: MSO PUGET SOUND UNIT CASE NUMBER: MC95015622

RECEIVED: 160CT95 VIA: U.S. MAIL

NUMBER OF SAMPLES: TEN (10)

LAB NO. OF SPILLS: 1,2,5,6 AND 7 LAB NO. OF SUSPECTS: 3,4,8,9 AND 10

ANALYSIS METHODS:

GAS CHROMATOGRAPHY (GC)
GAS CHROMATOGRAPHY/MASS SPECTROMETRY (GC/MS)

RESULTS:

- 1. Samples 1,2,5,6 and 7 were specified to have been representative of spilled oil. Analysis indicates:
- a. Samples 1,2,5 and 6 are similar and contain a severely biodegraded and evaporatively weathered heavy fuel oil mixed with lubricating oil.
- b. Sample 7 contains only traces of a severely biodegraded heavy fuel oil mixed with lubricating oil. The characteristics of sample 7 are similar to those expected for a severely weathered version of samples 1,2,5 and 6.
- 2. Suspected source sample 8 is observed to contain a heavy fuel oil with characteristics similar to those of the heavy fuel oil component of the spilled oil. Most differences are consistent with biodegradative and evaporative weathering of the spilled oil; However, this sample contains no lubricating oil.
- 3. Suspected source samples 3 and 4 are observed to contain biodegraded light fuel oil with characteristics different from those of the spilled oil.
- 4. Suspected source samples 9 and 10 are observed to contain mixtures of fuel oil and lubricating oil with characteristics different from those of the spilled oil.

CONCLUSIONS:

- 1. Spill samples 1,2,5,6 and 7 represent different portions of the same spilled oil.
- 2. The heavy fuel oil in suspected source sample 8 and the spill samples 1,2,5,6 and 7 may be derived from a common source. Biodegradation, as noted in the spilled oil samples, is characteristic of oil that has been retained in a contaminated

CONTINUATION OF OIL SPILL IDENTIFICATION REPORT 96-013

environment for an extended period of time. Not all differences noted are consistent with biodegradative weathering of the spilled oil. It should be noted that lubricating oil contamination is very common in sewers. For this reason, the area in proximity to the location from which sample 8 was collected should be investigated further as the most likely source of the spilled oil.

3. None of suspected source samples 3,4,9 or 10 are derived from a common source of the spill samples 1,2,5 and 6.

Marthad Hendrick

UNITED STATES COAST GUARD OIL IDENTIFICATION LABORATORY

SAMPLE CHECK-IN LOG, COIL CASE NUMBER: 96-013

REQUESTOR: MSO PUGET SOUND UNIT CASE# MC95015622

!		METHOD OF DELIVERY		DATE RECEIVED
U	JS MAIL	MESSENGER	OTHER	
NUMBER	DATE MAILED	O/A		1
N/A	11 OCT 95			16 OCT 95

Samples were observed to be: broken NO, tampered with NO, leaking NO, or subject to contamination NO. For these and other unusual conditions, place an asterisk (*) next to the sample(s) in question and describe condition of sample(s) in remarks below.

LAB NO.	SAMPLE DESCRIPTION	SPILL	SUSPECT
LAB NO.	[1] OIL FROM PIPE OF SEWER OUTFALL AT BREAK		!
96-013-1	·	xxxxx	Ì
96-013-1	[2] SAMPLE OF FUEL IN THE WATER		1
96-013-2	02 OCT 95 0850	xxxxx	1
90-013-2	[3] POSSIBLE SOURCE FROM HOLE IN GROUND AT		1
96-013-3	AMERICAN DISTRIBUTING 02 OCT 95 1010		XXXXX
	! [4] POSSIBLE SOURCE AMERICAN DISTRIBUTING		!
96-013-4	HOLE IN GROUND 02 OCT 95 1012		XXXXX
70 010 1	HOLE IN GROUND 02 OCT 95 1012 [5] DRAIN LINE IN YARD DOCK. BY FENCE LINE		-
96-013-5	IN LOG YARD 05 OCT 95 1155	XXXXX	1
<u> </u>	[6] SEWER OUTFALL IN YARD DOCK BY FENCE LINE		1
96-013-6	IN LOG YARD 05 OCT 95 1200	XXXXX	1
	[7] SEWER OUTFALL UNDER LOG ROLE IN LOG YARD		!
96-013-7	02 OCT 95 1615	XXXXX	1
	[8] POSSIBLE SOURCE OF BLACK OIL IN PIPE IN		-
96-013-8	IN GARAGE OLD ENGINE ROOM 05 OCT 95 1210		<u> </u>
	[9] BILGE SIDE OF TANK AT DUNLAP TOWING		
96-013-9	05 OCT 95 1233	L	; XXXXX
	[10] BILGE TANK OF POSSIBLE SOURCE OF TANK		ł
96-013-10	DUNLAP TOWING 05 OCT 95 1233		XXXXX
!			
		<u></u>	<u> </u>
			1
		<u>. </u>	
		! !	! !
		! !	!
	j 1	! !	•
REMARKS:			

Samples checked-in by:	Date:	16 OCT 95
		16 00795
Supervisor of Analysis: Manthas Hendwick	Date:	17 Oct 95

From: COMMANDING OFFICER, MARINE SAFETY OFFICE PUGET SOUND
To: Commanding Officer, Marine Safety Laboratories
Subj: REQUEST FOR OIL SAMPLE ANALYSIS
1. Request analysis of the samples listed on attached Chain of Custody Record to assist in our investigation of spill case FPN 13-1001 MC95015622 (Federal Project Number and Marine Casualty "MC" number)
2. Questions concerning this case should be directed to BM2 CHRIS P. Schrberry COMMERICAL# 266-217-6232.
3. The spill samples were collected from SENER BUTFALL FACILITY. SENER DEAIN AND BAY (river, outfall, shore, etc)
(river, outlair, shore, etc)
4. Estimated number of gallons spilled 50; Estimated cost of cleanup \$3,000.
5. Wind conditions:mild breeze;Very Windy; X Calm.
6. Air Temperature:below 32F; X 32 to 60F;60 to 85F85 to 95F;over 95F.
7. Sky conditions: X_Overcast; Bright Sun; Rain; Other (specify)
8. Spill involves seepage of oil through the soil: Yes X No. If Yes, estimated distance to the nearest possible suspected source:
9. List any possible non-petroleum contamination sources in the area pope
10. Are all samples involved in this case being sent to the laboratory? YES If not, explain
11. Have all possible suspect sources been sampled If NO, include a detailed explanation of possible sources not sampled. Provide any additional information about the samples or overall situation which may be helpful to lab personnel:
12. Specify prosecution type: X Class 1; Class 2; DOJ.
(SIGNATURE)

C-2

UNITED STATES COAST GUARD CHAIN OF CUSTODY RECORD

TIKU)	AND ADD	RESS)	U.S. MAR PUG 1519	AMANDING OFFICER COAST GUARD INE SAFETY OFFICE ET SOUND ALASKAN WAY SOUTH
	· · · · · · · · · · · · · · · · · · ·	1	SEA	TTLE, WA. 98134-1192
SPILL	SOURCE	SAMPLE	NO.	DESCRIPTION OF SAMPLES FOR CASE#MC95015622
XXX		1		OIL FROM PIPE OF SEWER OUTFALL AT BREAKWALL
XXX		٦		Sample of fuel in the mater
!	×××	3		POSSIBLE SOURCE FROM HOLE IN GREALD OF AMERICANDI
	xxY	4		POSSIBLE Source FROM Amoercian Distrebuting Hole 175
×××	: ! !	5		DRAIN LING IN YARD DOCK by PENCE LINE. TO SYAM
×××	ι ! !	4		Sever out face in YARD DOCK by Forceline, las you
×××	 	7		Sower outfact under top role in log takes
~^~	t 1 1	8		Possible Source of Black oil in Garage of all Endir Rock
×××	1 1 1	9		BILGE-SIDE OF TONK DUNLER Toming ail SIDE
	×××	: `		BILSE TANK OF Ounterpring Bilse Site
	XXX	10		1 80.28
	1 1 1	i 1		
	1 1	i i		
	1 1	, ! [

PERSON A	SSUMING RESPONSIBI	LITY FO	r samples '	1 1 1	TIME/DATE
SAMPLE NUMBER	RELINQUISHED BY:	DATE/	RECEIVED BY:	DATE/	REASON FOR CHANGE OF CUSTODY
1-10	BMZ 4BSCARbonay	1495 1503	MGT - Honx	02 City	STORAGE
SAMPLE NUMBER	RELINQUISHED BY:	DATE/	RECEIVED BY:	DATE/ TIME	OF CUSTODY
1-10	Mars Don't Come	1430	BM2CP. Scar Bours	1106795 1130	Ship to Coil
SAMPLE NUMBER	RELINQUISHED BY:	DATE/	RECEIVED BY:	DATE/ TIME CO 30	REASON FOR CHANGE OF CUSTODY
1-1D	BM & Schebarry	1437	MGT3 ATMGL	1600775	BEASON FOR CHANGE
SAMPLE NUMBER	RELINQUISHED BY:	DATE/ TIME	RECEIVED BY:	DATE/	REASON FOR CHANGE OF CUSTODY
•	 		1 1 1 1	1	

PAGE / OF /

MARINE SAFETY LABORATORIES OIL IDENTIFICATION LABORATORY

SAMPLE PREPARATION SHEET

21 20	me ppenapen. // Oc	77.85
DIL CASE NUMBER: 96-013 DA	IE PREPARED:	les The
I samples were obtained using preparation amples were then placed into a vial and ide imber and sample number along with the corr	techniques listed be ntified with the COI esponding preparations	IL case on code(s).
il samples eliminated by IR screening metho	d:	
he Quality Control sample is a duplicate of	sample: <u>- 76-0/3</u>	5-8
SAMPLE NUMBERS (sequential portion only)	PREPARATION CODE	RATIO
12348910.00	2	
1,2,3,4,8,9,10,0C 5.6,7	4.7	
PREPARATION CO	DDES	
1. Portion of neat sample taken from sample jar (c		
nortion of sample taken from sample jar, anhydr	ous MgSO ₄ added, then c	entrifuged.
3 Portion of sample taken from sample jar, dilute	ed with cyclohexane, anh	ydrous MgSO ₄
added, then centrifuged. 4. Entire sample extracted with cyclohexane, anhy		
5. Entire sample extracted with two separate 10 m	l portions of cyclohexar then centrifuged.	ie, annydrous
6. Cyclohexane Solution: ratio of oil to cyclohex column.	ane is known and shown	in "ratio"
7. Cyclohexane Solution of unknown concentration.		
8. Solvent evaporated with heat and a stream of h	12. Sample of unknown c	oncentration
9. Others:		
Propager's Signature: Bus Alt	Date: <u>//</u>	10 =0.0

Revised 4/95

MARINE SAFETY LABORATORIES OIL IDENTIFICATION LABORATORY

QUALITY CONTROL SHEET

COIL CASE NUMBER: 96-013 DATE PREPARED: 160CT 95
1. A Quality Control (QC) sample was analyzed along with the other samples in this case. The Quality Control (QC) is a duplicate of sample 96-0/3-8 Due to limited sample quantity in all samples involved in the case, reference oil from the COIL Library was used for the Quality Control (QC) and it's duplicate sample. Infrared Spectroscopy used for screening samples before final sample preparation. No QC sample available during IR screening.
2. ANALYTICAL METHODS. SAT N/A INFRARED SPECTROSCOPY GAS CHROMATOGRAPHY FLUORESCENCE SPECTROSCOPY GAS CHROMATOGRAPHY/MASS SPECTROMETRY
3. The data and conclusions for the QC and it's duplicate were identical: YesX No COMMENTS:

SUPERVISOR OF ANALYSIS: Many had Dendrice DATE: 180CT95

UNITED STATES COAST GUARD MARINE SAFETY LABORATORY

OIL SPILL IDENTIFICATION ANALYSES COST RECOVERY DOCUMENTATION

LABORATORY CASE NUMBER: 96-013

REQUESTOR: MARINE SAFETY OFFICE PUGET SOUND

UNIT CASE NUMBER: MC95015622

NUMBER OF SAMPLES: 10

NUMBER OF ANALYSES: 18

COST PER ANALYSIS: \$97.00

TOTAL COSTS: \$1746.00

This documentation is provided for purposes of Phase IV - Documentation and Cost Recovery under the National Oil and Hazardous Substances Pollution Contingency Plan(40 CFR Part 300).

MARTHA S. HENDRICK DATE: 180CT95
Chemist

OIL SPILL IDENTIFICATION SYSTEM (OIS)

RELEVANCE TO SPILL SOURCE DETERMINATION

Petroleum is a complex mixture of thousands of different organic compounds formed from a variety of organic materials that are chemically converted under differing geological conditions over long periods of time. The infinitely variable nature of these factors results in distinct chemical differences between oils formed under dissimilar conditions and/or environments. While oil from one crude oil field is readily distinguishable from another, differences in the makeup of oils from the same crude oil field can sometimes be observed as well. Refined oils are fractions usually derived by distillation of crude oil. Two refined oils of the same type differ because of dissimilarities in the characteristics of their crude oil feed stocks as well as variations in refinery processes and any subsequent contact with other oils mixed in during transfer operation from residues in tanks, ships, pipes, hoses etc... Thus, all petroleum oils, to some extent have chemical compositions that differ from each other.

The characteristic properties of an oil can be explored by a variety of analytical methods. The results of analysis by any of these methods can be presented in graph form. In general, when the graphical data for two oils produced by a particular method are compared, the differences between the graphs reflect differences between the oils.

The OIS System, developed during the mid-1970s at the Coast Guard Research and Development Center, is based on a multi-method approach to "fingerprinting" oils. In 1978, the Central Oil Identification Laboratory (COIL) was established as the operating facility to implement the OIS. In 1988, COIL was renamed the Marine Safety Laboratories (MSL), though the acronym COIL is still widely used. OIS is designed to determine the unique, intrinsic chemical properties of oils via analytical techniques and establish whether or not a common source relationship exists between samples of spilled oil and samples of oil from a suspected source. Since 1978, MSL/COIL has analyzed over 39,000 samples, involving more than 5,700 spill cases, in support of oil pollution investigations.

DATA PRODUCTION AND INTERPRETATION

Oil sample preparation, testing and storage are conducted in accordance with American Society for Testing and Materials (ASTM) consensus standards. MSL/COIL currently utilizes three primary analytical techniques: Gas Chromatography (GC) (ASTM D-3328), Fluorescence Spectroscopy (FL) (ASTM D 3650), Infrared Spectroscopy (IR) (ASTM D-3414), and Gas Chromatography-Mass Spectrometry (GC-MS) (ASTM D-5739) that is used as a complementary analytical method. A rigorous laboratory quality assurance program monitors both instrument performance and sample preparation to ensure that data are accurate and reproducible.

All samples in a given case are initially analyzed by one method to determine the class of petroleum product. Samples can be excluded from further analysis based on results from the initial analysis. Further analyses are performed on samples which are potential matches to the source of the oil.

The Supervisor of Analysis interprets the data from all test methods performed and draws conclusions concerning whether or not certain spilled oil and suspected source samples were derived from the same chemical source. Data interpretation in oil spill source identification is non-trivial and fundamentally different from typical chemical analyses because the chemical properties of spilled oil are altered when oil is introduced into the environment. From the moment oil enters the environment, evaporation, dissolution, photochemical oxidation, biodegradation and other forces begin to alter the oil's characteristics or "fingerprint". These combined processes are termed weathering and can significantly complicate data interpretation. Contamination of the spilled oil with other oils or substances is another complicating factor. The experienced oil spill analyst is familiar with the complexities of the weathering processes and is able to distinguish real differences between two oils from those apparent differences resulting from weathering alterations. Interferences from contaminants can usually be recognized as such and discounted when weighing the test results. However, at times, severe weathering and/or contamination can mask many of the inherent differences between oils of a similar type.

REPORTING

The typical MSL/COIL OIS Report consists of four parts: case identifying information, a listing of analysis techniques performed, the results section and the conclusions section. The results section describes the types of petroleum observed in the samples provided, and comments on chemical similarities or dissimilarities between spill samples and/or between spill and suspected source samples. In all cases the Supervisor of Analysis bases the written results on interpretations from the aggregate of all data generated.

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MSL/COIL OIS Reports are submitted to Marine Safety Offices (MSO's) for inclusion, as chemical evidence, in Marine Violation/Casualty Reports. The outcomes in the conclusions section of the OIS Report define the nature of the chemical evidence provided. MSO personnel are advised to combine the chemical evidence provided in the MSL/COIL OIS Reports with physical and circumstantial evidence developed during the investigation when writing Marine Violation Reports. Inquiries challenging the technical content of MSL/COIL OIS Reports by representatives of the alleged responsible party should be handled at the Hearing Officer level. Explicit guidance describing the communications process between the Hearing Officer and the MSL/COIL Supervisor of Analysis on technical issues involving chemical evidence is given in Commandant (G-LMI) memorandum 16460 dated 26 January 1981.

PERSONNEL QUALIFICATIONS

MSL/COIL laboratory technicians performing sample preparation and testing are graduates of the Coast Guard Marine Science Technician School. Each MSL/COIL technician has successfully completed a comprehensive training program at the MSL/COIL facility. Additionally, many have received supplemental training at leading civilian institutions in their specialty area.

The Supervisor of Analysis monitors all aspects of the analysis, certifies and interprets the test results, and prepares the final MSL/COIL report. This individual is a professionally trained chemist experienced in oil spill source identification. Individuals currently qualified to perform this function are:

Lieutenant Commander Kristy L. Plourde, U.S. Coast Guard Commanding Officer

B.S. Physical Sciences, 1983, US Coast Guard Academy M.S. Chemistry, 1989, University of Connecticut

Dr. Martha Hendrick

Chemist

B.A. Chemistry, 1969, Rhodes College

M.A. Education, 1974, Stanford University

Ph.D. Analytical Chemistry, 1985, University of Connecticut Chair, ASTM Subcommittee D19.31, Waterborne Oils

REFERENCES

A more technical description of the OIS is contained in Report CG-D-52-77 "Oil Spill Identification System", Final Report, June 1977, USCG R&D Center. This document is available through the National Technical Information Service, Springfield, VA 22161.

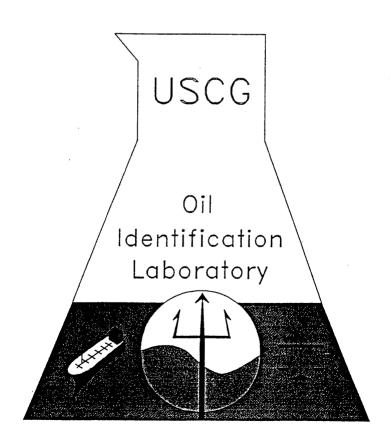
For information concerning the ASTM standards used in Oil Spill Identification, consult "Oil in the Environment", Martha S. Hendrick, Ph.D., ASTM Standardization News, April 1991.

For additional information regarding the applicability of the Coast Guard's OIS, see "Chemical Identification of Oil Spill Sources", Allen P. Bentz, Ph.D., The Forum, Volume XIII, Number 2, Winter 1978. Dr. Bentz is a research scientist at the Coast Guard Research and Development Center and a recognized expert in the field of oil spill source identification. He has been closely involved with most of the development work leading to the present state-of-the-art.

OIL SAMPLE ANALYSIS REPORT

MARINE SAFETY OFFICE PUGET SOUND CASE NUMBER MC95015622

MARINE SAFETY LABORATORY CASE NUMBER 96-097



Commanding Officer
U. S. Coast Guard
Marine Safety
Laboratories

1082 Shennecossett Road Groton, CT 06340-6094 Phone: (860) 441-2645 Fax: (860) 441-2641

16400

DEC 20 1995

From: Commanding Officer, Marine Safety Laboratories

To: Commanding Officer, Marine Safety Office Puget Sound

Subj: OIL SAMPLE ANALYSIS REPORT, MSO PUGET SOUND CASE# MC95015622

MSL CASE #96-097

1. The laboratory analysis of this case has been completed and our report is forwarded. The technical data supporting the report (spectrograms and chromatograms) have been archived at our facility and are available upon request. We will maintain the oil samples in refrigerated storage pending final case disposition.

2. Questions concerning this report or the analytical methods used should be directed to the Supervisor of Analysis, Dr. Hendrick.

Manthas Hendurk

M. S. HENDRICK By direction

Encl: (1) MSL Report 96-097

(2) OIS Addendum

UNITED STATES COAST GUARD MARINE SAFETY LABORATORIES OIL IDENTIFICATION LABORATORY

OIL SPILL IDENTIFICATION REPORT

LABORATORY CASE NUMBER: 96-097

REQUESTOR: MSO PUGET SOUND UNIT CASE NUMBER: MC95015622

RECEIVED: 14DEC95 VIA: CERTIFIED MAIL (# P 902 422 199)

NUMBER OF SAMPLES: FIVE (05)
LAB NO. OF SPILLS: 3 AND 4
LAB NO. OF SUSPECTS: 1.2 AND 5

ANALYSIS METHODS:

GAS CHROMATOGRAPHY (GC)
GAS CHROMATOGRAPHY/MASS SPECTROMETRY (GC/MS)

SPECIAL INSTRUCTIONS:

1. Compare the samples submitted with spill samples from COIL Case 96-013.

RESULTS:

- 1. Samples 96-097-3 and 4 were specified to have been representative of spilled oil. Analysis indicates they do not contain a detectable quantity of petroleum oil.
- 2. Samples 96-013-1,2,5,6 and 7 were specified to have been representative of previously spilled oil. Analysis indicates:
- a. Samples 96-013-1,2,5 and 6 are similar and contain a severely biodegraded and evaporatively weathered heavy fuel oil mixed with lubricating oil.
- b. Sample 96-013-7 contains only traces of a severely biodegraded heavy fuel oil mixed with lubricating oil. The characteristics of sample 96-013-7 are similar to those expected for a severely weathered version of samples 96-013-1,2,5 and 6.
- 3. Suspected source sample 96-097-2 is observed to contain a severely biodegraded and evaporatively weathered heavy fuel oil mixed with lubricating oil. The characteristics are similar to those of the heavy fuel oil component of the spilled oil. However, this sample contains signficantly less lubricating oil than the spill samples.
- 4. Suspected source sample 96-097-5 is observed to contain a heavy fuel oil with characteristics different from those of the spilled oil.
- 5. Suspected source sample 96-097-1 is observed to contain only traces of petroleum oil. Results are of no value for comparison purposes.

CONCLUSIONS:

- 1. Comparison of spill samples 96-097-3 and 4 is inconclusive because they do not contain a sufficient quantity of petroleum oil for comparison purposes.
- 2. Suspected source sample 96-097-2 and the spill samples 96-013-1,2,5,6 and 7 are closely related and appear to be derived from common sources of petroleum oil. Sample 96-097-2 appears to represent another portion of spilled oil, rather than the origin of the spill. The difference in the proportion of lubricating oil indicates that more than one source is probably responsible for the problem. Biodegradation, as noted in these oil samples, is characteristic of oil that has been retained in a contaminated environment for an extended period of time. The source from which sample 96-013-8 (previously discussed in case 96-013) was collected is a likely source of the fuel oil portion of the spilled oil.
- 3. Suspected source sample 96-096-5 is not derived from a common source of the spilled oil. $\mathcal{L}_{\mathcal{A}}$
- 4. Comparison of suspected source sample 96-097-1 is inconclusive because they do not contain a sufficient quantity of petroleum oil for comparison purposes.

Manthas Hendrick

U. S. COAST GUARD

MARINE SAFETY LABORATORIES

MSL CASE #: 96-097

REQUESTOR MSO PUGET SOUND UNIT CASE MC95015622

METHOD OF DELIVERY: CERTIFIED MAIL

TRACKING #: P 902 422 199

FPN: 13-6001

DATE MAILED: 07-Dec-95 DATE RECEIVED: 14-Dec-95 SAMPLES TAMPERED WITH?

No CRIMINAL? No No

SAMPLES E	BROKE	N?	No	SAMPLE	S LEAP	KING?	No	NETS?	No	CRIMI	NAL?	No
MSL#			DE	SCRIPTIC	N	DATE	DATE/TIME TAKEN			SPILL/SOURCE		
96-097-1	1	WELL O		IT SIDE OI	F ROAD	NEAR F	ENCE		06 DEC	95 1200	S	OURCE
96-097-2	2			INSIDE O		NMENT A	REA		06 DEC	95 1225	S	OURCE '
96-097-3	3	FROM V	VATER	OUTLET A	AT DUNI	LAP TOW	'ING		06 DEC	95 1340		SPILL
96-097-4	4	SAMPLE	OF OL	JTFALL AT	T DUNL/	AP TOWII	NG		06 DEC	95 1345		SPILL
96-097-5	5	NO 3 TA YARD #		OTT PAPE	R IN CO	MAIATAC	ENT		06 DEC	95 1315		
33 33. 3	To be a second reason of the s											DURCE
							,					
				***					·			
	to being a special and a speci							Transportation on the value of				

REMARKS: COMPARE TO CASE 96-013

Samples checked in by: James J. Brigg	Date:	15 DEC 95
Sample Custodian:	Date:	1505095
Supervisor of analysis: Manthas Hendrick	Date:	18 Dec 95

PAGE: 1 OF:

From: Zommanoine Officor, marine SAFETY OFFICE PAGET SOUND
To: Commanding Officer, Marine Safety Laboratories
Subj: REQUEST FOR OIL SAMPLE ANALYSIS
1. Request analysis of the S samples listed on attached Chain of Custody Record to assist in our investigation of spill case FPN 13 6001 MC45015622
(Federal Project Number and Marine Casualty "MC" number)
2. Questions concerning this case should be directed to BM2 CHRIS P. SCARBORRY COMMERICAL#266-2(7-6232.
3. The spill samples were collected from Schercuspall, Mobile. WEIL, AMORICAN DISTRIBUTION WELL, FARTANK (river, outfall, shore, etc)
4. Estimated number of gallons spilled 50; Estimated cost of cleanup 35,000.
5. Wind conditions:mild breeze;Very Windy; X Calm.
6. Air Temperature:below 32F; \(\square 32\) to 60F;60 to 85F85 to 95F;over 95F.
7. Sky conditions:Overcast;Bright Sun;Rain;
8. Spill involves seepage of oil through the soil: XYes No. If Yes, estimated distance to the nearest possible suspected source:
9. List any possible non-petroleum contamination sources in the area NonE
10. Are all samples involved in this case being sent to the laboratory? (5) If not, explain
•
11. Have all possible suspect sources been sampled, If NO, include a detailed explanation of possible sources not sampled. Provide any additional information about the samples or overall situation which may be helpful to lab personnel: - CLASE Sample Seponale Then Compare to CASE. 910-013
12. Specify prosecution type: X Class 1; Class 2; DOJ.
MST3 DON LAISUNG
C-2

UNITED STATES COAST GUARD CHAIN OF CUSTODY RECORD

(UNIT	AND ADI	ORESS)	U.S. COAST GUARD MARINE SAFETY OFFICE PUGET SOUND 1519 ALASKAN WAY SOUTH CEATTLE, WA. 98134-1192		
: SPILL	SOURCE	SAMPLE NO.	DESCRIPTION OF SAMPLES FOR CASE# m<95615622		
! !	×ף		WELL ON RIGHT SIDE OF ROAD WEAR		
	XXX	2	BACK NE WELL INSIDE CONTAINMENT ARM		
XXX] 1 1 1 1	3	FROM WATER OUTLET AT DUNLAP TOWING		
XXX		4	From water outlet At Dunlap towing		
	$\times \times \times$	5	FROM CONTAINER YARD AT SCOTT PAPOR #3 TANK CONTAINS #6 FUEL SIL		
PERSO	ON ASSUM	ING RESPON	SIBILITY FOR SAMPLES TIME/DATE		
SAMPLE RELINQUISHED NUMBER SAMPLE RELINQUISHED SAMPLE RELINQUISHED NUMBER D		C.P.Scarbors	TIME DON LAISUNE, USTS 1654 REASON FOR CHANGE		
1-5	Don	LAISUNE US	12-7-91 CHOIS, P.Scanburg/12-7.95 Shiptocoil		
SAMPI NUMBE	ER O	INQUISHED I	DATE RECEIVED BY: DATE REASON FOR CHANGE TIME OF CUSTODY 12795 Lower Paper 195 95		
SAMPI NUMBE	-	INQUISHED I	BY: DATE RECEIVED BY: DATE REASON FOR CHANGE TIME OF CUSTODY		

SAMPLE PREPARATION SHEET

COIL CASE NUMBER: 96-097					
Oil samples were obtained using preparation samples were then placed into a vial and idenumber and sample number along with the corresponding to the corresp	responding preparati	JIL Case			
Oil samples eliminated by IR screening method	od:	11			
and the second s		4,00			
The Quality Control sample is a duplicate or	f sample: <u>96-697</u>	-2			
SAMPLE NUMBERS (sequential portion only)	PREPARATION CODE	RATIO			
13.4	5,7				
2.20	2				
5	3,7				
		·			
PREPARATION CO	DES				
1. Portion of neat sample taken from sample jar (cl					
2. Portion of sample taken from sample jar, anhydrous MgSO ₄ added, then centrifuged.					
3. Portion of sample taken from sample jar, diluted with cyclohexane, anhydrous MgSO ₄ added, then centrifuged.					
4. Entire sample extracted with cyclohexane, anhydrous MgSO4 added, then centrifuged.					
5. Entire sample extracted with two separate 10 ml portions of cyclohexane, anhydrous MgSO ₄ added to the combined cyclohexane solution, then centrifuged.					
6. Cyclohexane Solution: ratio of oil to cyclohexan column.		n "ratio"			
7. Cyclohexane Solution of unknown concentration.					
8. Solvent evaporated with heat and a stream of N_2 . Sample of unknown concentration.					
9. Others:					
Preparer's Signature: Janua 7- Sniff Date: 1501/95					
Revised 4/95					

QUALITY CONTROL SHEET

COLL CASE NUMBER: 96-097	DATE PREPARED: 15DEC 95
CUIT CITE III	
1. A Quality Control (QC) sai	mple was analyzed along with the other
samples in this case.	9(997)
The Quality Control (QC) is a duplicate of sample 96-897-2
Due to limited sample q	uantity in all samples involved in the
case, reference oil	from the COIL Library
used for the Quality Co	ntrol (QC) and it's duplicate sample.
Infrared Spectroscopy u	sed for screening samples before final
sample preparation. No	QC sample available during IR screening
2. ANALYTICAL METHODS.	• ·
	SAT ! N/A
INFRARED SPECTROSCOPY	
GAS CHROMATOGRAPHY	
FLUORESCENCE SPECTROSCOPY	
GAS CHROMATOGRAPHY/MASS S	PECTROMETRY
a who does and conclusions	for the QC and it's duplicate were
identical:	res_X No
COMMENTS:	
\sim	

SUPERVISOR OF ANALYSIS: Marthas Hendrich

UNITED STATES COAST GUARD MARINE SAFETY LABORATORY

OIL SPILL IDENTIFICATION ANALYSES COST RECOVERY DOCUMENTATION

LABORATORY CASE NUMBER: 96-097

REQUESTOR: MARINE SAFETY OFFICE PUGET SOUND

UNIT CASE NUMBER: MC95015622

NUMBER OF SAMPLES: 05

COST PER SAMPLE PREPARED: \$20.00

TOTAL COSTS OF SAMPLE PREPARATION: \$100.00

NUMBER OF ANALYSES: 15

COST PER ANALYSIS: \$85.98

TOTAL COSTS FOR ANALYSIS: \$1289.70

TOTAL COSTS: \$1389.70

This documentation is provided for purposes of Phase IV - Documentation and Cost Recovery under the National Oil and Hazardous Substances Pollution Contingency Plan(40 CFR Part 300).

Marthad Hendorch

MARTHA S. HENDRICK DATE: 20DEC95 Chemist

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Lieutenant Commander Kristy L. Plourde, U.S. Coast Guard Commanding Officer

B.S. Physical Sciences, 1983, US Coast Guard Academy M.S. Chemistry, 1989, University of Connecticut

Dr. Martha Hendrick

Chemist

B.A. Chemistry, 1969, Rhodes College

M.A. Education, 1974, Stanford University

Ph.D. Analytical Chemistry, 1985, University of Connecticut Chair, ASTM Subcommittee D19.31, Waterborne Oils

REFERENCES

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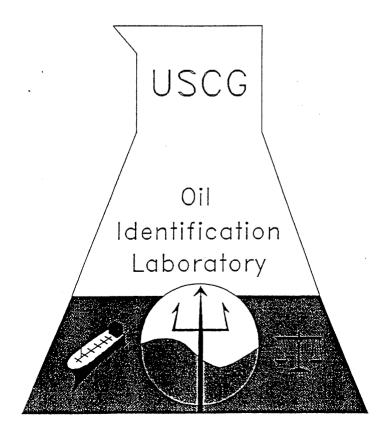
For information concerning the ASTM standards used in Oil Spill Identification, consult "Oil in the Environment", Martha S. Hendrick, Ph.D., ASTM Standardization News, April 1991.

For additional information regarding the applicability of the Coast Guard's OIS, see "Chemical Identification of Oil Spill Sources", Allen P. Bentz, Ph.D., The Forum, Volume XIII, Number 2, Winter 1978. Dr. Bentz is a research scientist at the Coast Guard Research and Development Center and a recognized expert in the field of oil spill source identification. He has been closely involved with most of the development work leading to the present state-of-the-art.

OIL SAMPLE ANALYSIS REPORT

MARINE SAFETY OFFICE PUGET SOUND CASE NUMBER MC95015622

MARINE SAFETY LABORATORY CASE NUMBER 96-117





Commanding Officer
U. S. Coast Guard
Marine Safety
Laboratories

1082 Shennecossett Road Groton, CT 06340-6094 Phone: (860) 441-2645 Fax: (860) 441-2641

16400

JAN 16 1996

From: Commanding Officer, Marine Safety Laboratories

To: Commanding Officer, Marine Safety Office Puget Sound

Subj: OIL SAMPLE ANALYSIS REPORT, MSO PUGET SOUND CASE# MC95015622

MSL CASE #96-117

1. The laboratory analysis of this case has been completed and our report is forwarded. The technical data supporting the report (spectrograms and chromatograms) have been archived at our facility and are available upon request. We will maintain the oil samples in refrigerated storage pending final case disposition.

2. Questions concerning this report or the analytical methods used should be directed to the Supervisor of Analysis, LCDR Plourde.

K. L. PLOURDE

Encl: (1) MSL Report 96-117

(2) OIS Addendum

UNITED STATES COAST GUARD MARINE SAFETY LABORATORIES OIL IDENTIFICATION LABORATORY

OIL SPILL IDENTIFICATION REPORT

LABORATORY CASE NUMBER: 96-117

REQUESTOR: MARINE SAFETY OFFICE PUGET SOUND

UNIT CASE NUMBER: MC95015622

RECEIVED: 12JAN96 VIA: CERTIFIED MAIL (# P 902 422 187)

NUMBER OF SAMPLES: FIVE (05) LAB NO. OF SPILLS: 96-117-1

LAB NO. OF SUSPECTS: 96-117-3, 4 AND 5

LAB NO. OF CLEAN WATER: 96-117-2

ANALYSIS METHODS:

GAS CHROMATOGRAPHY (GC)

RESULTS:

- 1. Sample 1 was specified to have been representative of spilled oil. Analysis indicates that it contains a slightly weathered and severely biodegraded petroleum oil.
- 2. Suspected source samples 3, 4, and 5 are observed to contain heavy fuel oils with characteristics different than those observed for the spilled oil sample.
- 3. Sample 2 was designated as a clean water sample. No petroleum oil was detectable by Gas Chromatography.

CONCLUSIONS:

- 1. Because of the severely biodegraded condition of spill sample 1, comparison with suspected source samples 3, 4 and 5 is inconclusive. Suspected source samples 3, 4, and 5 do not appear to be the source of spill sample 1. The slightly weathered and severely biodegraded condition of sample 1 is characteristic of an oil that has been retained in a contaminated environment, such as soil, for an extended period of time.
 - 2. Sample 2 represents essentially oil-free water.

SUPERVISOR OF ANALYSIS K. L. PLOURDE, LCDR, USCG DATE: 16JAN96
Commanding Officer/Chemist

UNITED STATES COAST GUARD OIL IDENTIFICATION LABORATORY

SAMPLE CHECK-IN LOG, COIL CASE NUMBER: 96-117

REQUESTOR: MSO PUGET SOUND UNIT CASE#: MC95015622

MET	HOD OF DELIVERY		DATE RECEIVED
XXXXXXXXX/CERTIFIED MAIL	MESSENGER	OTHER	
NUMBER DATE MAILED O/A	and the second s	4	- - - - - - - - - -
P 902 422 187; 09 JAN 96			<u> 12 JAN 96 </u>

Samples were observed to be: broken NO, tampered with NO, leaking YES, or subject to contamination NO. For these and other unusual conditions, place an asterisk (*) next to the sample(s) in question and describe condition of sample(s) in remarks below.

LAB NO.	SAMPLE DESCRIPTION	SPILL	SUSPECT
LAB NO.	[1] OIL RECOVERED IN THE WATER		1
96-117-1	08 JAN 96 1503	XXXXX	<u> </u>
	[2] FRESH WATER SAMPLE	.	!
96-117-2	08 JAN 96 1529	XXXXX	<u> </u>
	[3] PIPE OUTSIDE PUMP STATION O8 JAN 96 1400		XXXXX
96-117-3 **	[4] SOUTH WALL FUEL YARD MIDDLE		l AAAAA
96-117-4	! 08 JAN 96 1410		XXXXX
90-11/-4	[5] MIDDLE SOUTH WALL STAND PIPE		!
96-117-5	08 JAN 96 1415		XXXXX
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REMARKS:	96-117-4 WAS RECEIVED LEAKING		
^^ SAMPLE	YO-II-04 WAS RECEIVED DEARING		

Samples checked-in by:	Date:	12 Jan (-)6
Sample Custodian:	Date:	17 TAN 46
Supervisor of Analysis: Ke Plondo	Date:	167AN96

PAGE 1 OF 1 PAGES

From: Commading OFFICER, MARINE SAFETY OFFICE HIGET Some
To: Commanding Officer, Marine Safety Laboratories
Subj: REQUEST FOR OIL SAMPLE ANALYSIS
1. Request analysis of the samples listed on attached Chain of Custody Record to assist in our investigation of spill case 13-6001 mc95015622 (Federal Project Number and Marine Casualty "MC" number)
2. Questions concerning this case should be directed to Bm 2 CHRIS P. SCARGORRY COMMERICAL# 206 217-6232
3. The spill samples were collected from ONTFALL, BAY, SAWERP, PORCE
(river, outfall, shore, etc)
4. Estimated number of gallons spilled 360; Estimated cost of cleanup 10,000.
5. Wind conditions:mild breeze;Very Windy; Calm.
6. Air Temperature:below 32F; 32 to 60F; 60 to 85F 85 to 95F;over 95F.
7. Sky conditions: X Overcast; Bright Sun; Rain; Other (specify) RIT PARTLY Survy
8. Spill involves seepage of oil through the soil: Yes No. If Yes, estimated distance to the nearest possible suspected source:
9. List any possible non-petroleum contamination sources in the area $-\infty$
10. Are all samples involved in this case being sent to the laboratory? YES If not, explain
11. Have all possible suspect sources been sampled, YCS If NO, include a detailed explanation of possible sources not sampled. Provide any additional information about the samples or overall situation which may be helpful to lab personnel:
NUED MOST ALURATE TEST DOPE, NUED CAS.
CHROMATOGRAPHY SONT TO MATT FOR SCOLOGY STUDY.
12. Specify prosecution type:Class 1;Class 2;DOJ.
(SIGNATURE) C-2
- -

UNITED STATES COAST GUARD CHAIN GEAGUSTGUFREGERD U.S. COAST GUARD

			U.S. COAST GUARD
(UNIT	AND AD	DRESS)*****	FORT SOUND 1519 ALASKAN WAY SOUTH SEATTLE, WA. 98134-1192
SPILL	SOURCE	SAMPLE NO.	DESCRIPTION OF SAMPLES FOR CASE# MC95615622
沐木		1	DIL RECOVERED FROM WATER
XXX	! !	2	FRESHWATER SAMPLE 160 YAKIDS FACIN SPILL
	XXX	3	PIPE OUTSIDE Pump Station
	XXX	4	South WALL FUEL YARD MIDDLE
	XXX	5	South WALL FUEL YAND STAND PIPÉ
	1		
,			
	1		
			1 1 1 1
PERSO	ON ASSUN	MING RESPON	SIBILITY FOR SAMPLES TIME/DATE
SAMPI NUMBI		INQUISHED	BY: DATE/ RECEIVED BY: DATE/ REASON FOR CHANGE TIME VOTSCAISURE TIME OF CUSTODY STATE 1800 MCT?
SAMPI NUMBE	LE REI	14PSedur LINQUISHED 513 LAISURE	DATE/ RECEIVED BY: DATE/ REASON FOR CHANGE TIME TIME OF CUSTODY SMALL Ship BM2 Sender 6700 To Coil
SAMPLE RELINQUISHED E NUMBER -3 -3 -3 -3 -3 -3		INQUISHED	
SAMPI	-	LINQUISHED	BY: DATE/ RECEIVED BY: DATE/ REASON FOR CHANGE
	i		

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Delivered by (Clerk or Carrie)	Y Ne	ces scribed	Fice	- 7 T	elson		
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PS Form 3883, March 1991

*U.S. Government Printing Office: 1992 — 323-151

COIL CASE NUMBER: 76-17 D	ATE PREPARED: 🔼)AN TE
Oil samples were obtained using preparation samples were then placed into a vial and id number and sample number along with the cor	responding preparat	below. T OIL case ion code(
Oil samples eliminated by IR screening meth		-
The Quality Control sample is a duplicate o	of sample: 96-1/7	-3.
SAMPLE NUMBERS (sequential portion only)	PREPARATION CODE	RATIO
145	3,7	
	47	
3 01.		
7 1 3 3		
PREPARATION CO	DDES	
1. Portion of neat sample taken from sample jar (c	lean fuel oils).	
2. Portion of sample taken from sample jar, anhydr	ous MgSO ₄ added, then o	centriluged
3. Portion of sample taken from sample jar, dilute added, then centrifuged.		
4. Entire sample extracted with cyclohexane, anhyd	irous MgSO ₄ added, then	centriluge
5. Entire sample extracted with two separate 10 ml MgSO ₄ added to the combined cyclohexane solution, t		
6. Cyclohexane Solution: ratio of oil to cyclohexa column.	nne is known and shown	in "ratio"
7. Cyclohexane Solution of unknown concentration.		
8. Solvent evaporated with heat and a stream of N.	2. Sample of unknown c	oncentratio
9. Others:		
The signature Vine G. Valence	Date: [2]	SANGL
Preparer's Signature: //www.		

Revised 4/95

QUALITY CONTROL SHEET

COIL CASE NUMBER: 96-117	DATE PREPARED: 12 ANG
1. A Quality Control (QC) samples in this case. The Quality Control (QC) Due to limited sample quality case, reference oil used for the Quality Control (QC)	is a duplicate of sample 96-1/7-3 antity in all samples involved in the from the COIL Library v trol (QC) and it's duplicate sample. ed for screening samples before final QC sample available during IR screening
2. ANALYTICAL METHODS.	SAT ! N/A
INFRARED SPECTROSCOPY GAS CHROMATOGRAPHY FLUORESCENCE SPECTROSCOPY GAS CHROMATOGRAPHY/MASS SPE	ECTROMETRY
identical:	for the QC and it's duplicate were

#Eplande DATE: 167/1/

SUPERVISOR OF AMALYSIS:

UNITED STATES COAST GUARD MARINE SAFETY LABORATORIES OIL IDENTIFICATION LABORATORY GAS CHROMATOGRAPHY (GC) WORKSHEET

Case Number: 16-117 Instrument: ANA 2 Date of Analysis: 16 JANY6 cyclo-Comparison Spills hexane soln (unk. conc.) I I 1. Method/Analytical Conditions: ASTM D 3328 SOP: MSLINST 5200.8 Column Used FROND/ REAR HP program used: Column: DB-5, 30m x 0.32mm ID COIL Method Film Thickness: 0.1 micron
Column Number: 3768743 GAS Method OTHER: __ 2. Sample Preparation: Solvent: Cyclohexane Concentration: ______Other: _____Other: _____Other: _____Other: 3. Comments: Do comparisons show all spill samples the same? ___ Yes ___ No \succeq N/A Supervisor:

10/95 gcwk.doc

שמנם דודב: C. \mrCmmn1 \&\Dmin\\\++&\ 9:59:13 PM Seq. Line: Injection Date: 1/12/96 Vial No.: Acq. Method: OIL1.M Inj. No.: 1 Operator: 96-081-BLANK Inj. Vol.: not available Sample Name: Comments: 2400 2100 **7** 5 20 25

Seq. Line: Injection Date: 1/12/96 8:52:03 PM Vial No.: Acq. Method: OIL1.M Inj. No.: Operator: 96-117-QC Inj. Vol.: not available Sample Name: Comments: 5 15 20 30

Sample Name: 96-117-QC

vala riic. Injection Date: 1/12/96 3:16:33 PM Acq. Method: OIL1.M Operator:

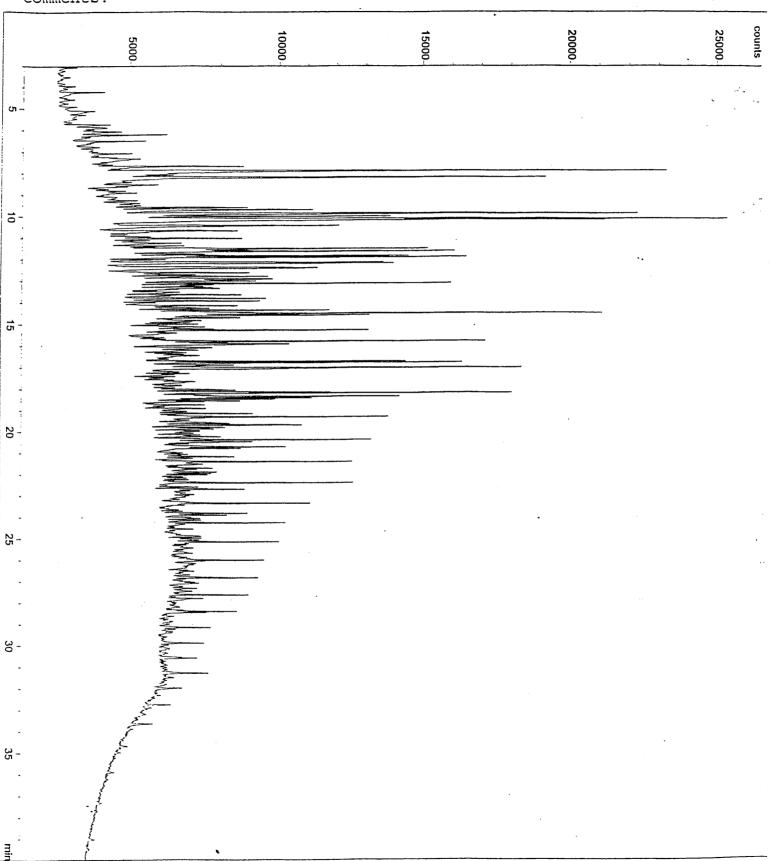
Seq. Line: Vial No.: 2 Inj. No.: 1

Sample Name: 96-117-03, QCM

96-117-03, QCM Sample Name:

Inj. Vol.: not available

Comments:



Data File. Seq. Line: 1/12/96 4:23:38 PM Injection Date: Vial No.: 3 Acq. Method: OIL1.M Inj. No.: 1 Operator: Inj. Vol.: not available Sample Name: 96-117-01, SPILL Comments: 10000

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Data Fire. Seq. Line: Injection Date: 1/12/96 5:30:45 PM Vial No.: OIL1.M Acq. Method: Inj. No.: Operator: 96-117-02, SPILL Inj. Vol.: not available Sample Name: Comments: 2100-10 15

25

Injection Date:

Acq. Method: Operator:

Sample Name:

1/12/96 6:37:49 PM

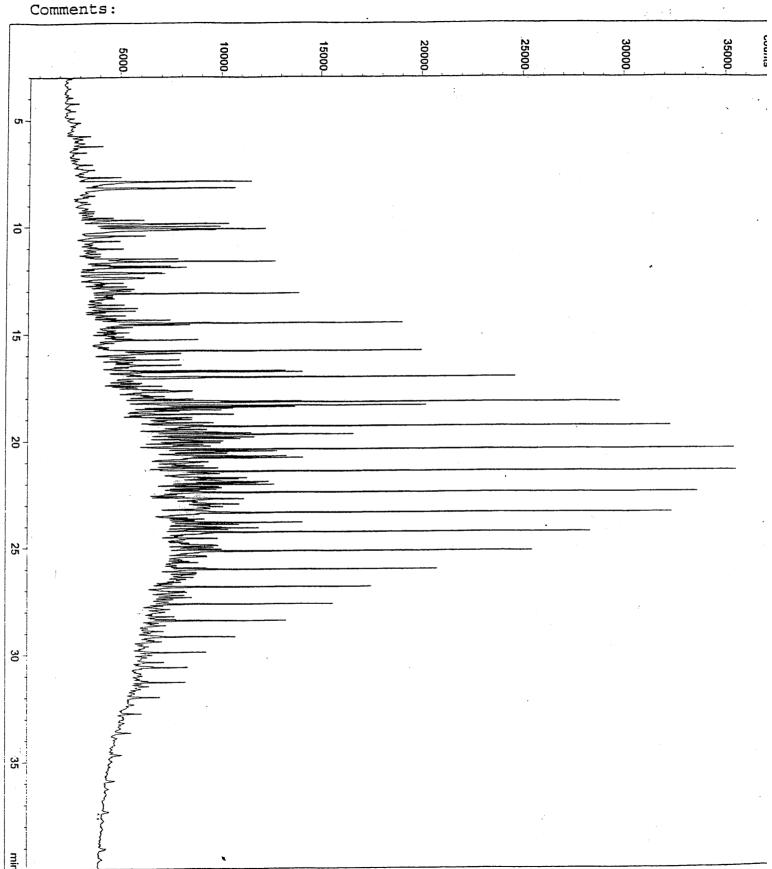
OIL1,M

Seq. Line: Vial No.:

Sample Name: 96-117-04

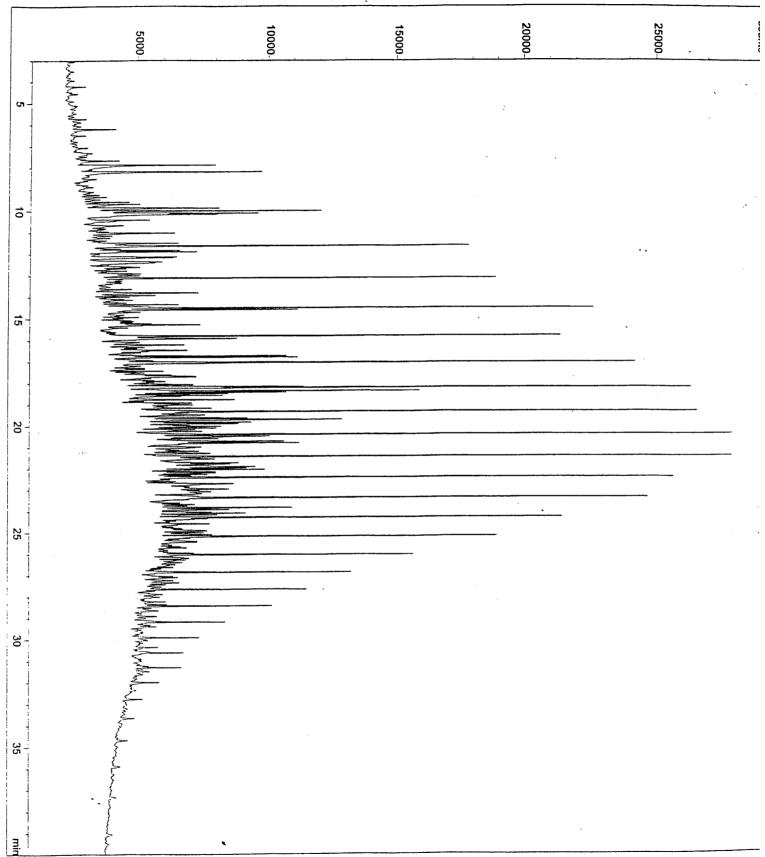
Inj. No.:

Inj. Vol.: not available 96-117-04



Data File: C:\HPCHEM1\2\DATA\0112\96-11706.D Seq. Line: 1/12/96 7:44:55 PM Injection Date: OIL1.M, Vial No.: Acq. Method: Inj. No.: Operator: Inj. Vol.: not available 96-117-05 Sample Name:

Comments:



Sample Name: 96-117-05

UNITED STATES COAST GUARD MARINE SAFETY LABORATORY

OIL SPILL IDENTIFICATION ANALYSES COST RECOVERY DOCUMENTATION

LABORATORY CASE NUMBER: 96-117

REQUESTOR: MARINE SAFETY OFFICE PUGET SOUND

UNIT CASE NUMBER: MC95015622

NUMBER OF SAMPLES: 05

COST PER SAMPLE PREPARED: \$20.00

TOTAL COSTS OF SAMPLE PREPARATION: \$100.00

NUMBER OF ANALYSES: 06

COST PER ANALYSIS: \$85.98

TOTAL COSTS FOR ANALYSIS: \$515.88

TOTAL COSTS: \$615.88

This documentation is provided for purposes of Phase IV - Documentation and Cost Recovery under the National Oil and Hazardous Substances Pollution Contingency Plan(40 CFR Part 300).

K. L. PLOURDE DATE: 16JAN96

Commanding Officer

OIL SPILL IDENTIFICATION SYSTEM (OIS)

RELEVANCE TO SPILL SOURCE DETERMINATION

Petroleum is a complex mixture of thousands of different organic compounds formed from a variety of organic materials that are chemically converted under differing geological conditions over long periods of time. The infinitely variable nature of these factors results in distinct chemical differences between oils formed under dissimilar conditions and/or environments. While oil from one crude oil field is readily distinguishable from another, differences in the makeup of oils from the same crude oil field can sometimes be observed as well. Refined oils are fractions usually derived by distillation of crude oil. Two refined oils of the same type differ because of dissimilarities in the characteristics of their crude oil feed stocks as well as variations in refinery processes and any subsequent contact with other oils mixed in during transfer operation from residues in tanks, ships, pipes, hoses etc... Thus, all petroleum oils, to some extent have chemical compositions that differ from each other.

The characteristic properties of an oil can be explored by a variety of analytical methods. The results of analysis by any of these methods can be presented in graph form. In general, when the graphical data for two oils produced by a particular method are compared, the differences between the graphs reflect differences between the oils.

The OIS System, developed during the mid-1970s at the Coast Guard Research and Development Center, is based on a multi-method approach to "fingerprinting" oils. In 1978, the Central Oil Identification Laboratory (COIL) was established as the operating facility to implement the OIS. In 1988, COIL was renamed the Marine Safety Laboratories (MSL), though the acronym COIL is still widely used. OIS is designed to determine the unique, intrinsic chemical properties of oils via analytical techniques and establish whether or not a common source relationship exists between samples of spilled oil and samples of oil from a suspected source. Since 1978, MSL/COIL has analyzed over 39,000 samples, involving more than 5,700 spill cases, in support of oil pollution investigations.

DATA PRODUCTION AND INTERPRETATION

Oil sample preparation, testing and storage are conducted in accordance with American Society for Testing and Materials (ASTM) consensus standards. MSL/COIL currently utilizes three primary analytical techniques: Gas Chromatography (GC) (ASTM D-3328), Fluorescence Spectroscopy (FL) (ASTM D 3650), Infrared Spectroscopy (IR) (ASTM D-3414), and Gas Chromatography-Mass Spectrometry (GC-MS) (ASTM D-5739) that is used as a complementary analytical method. A rigorous laboratory quality assurance program monitors both instrument performance and sample preparation to ensure that data are accurate and reproducible.

All samples in a given case are initially analyzed by one method to determine the class of petroleum product. Samples can be excluded from further analysis based on results from the initial analysis. Further analyses are performed on samples which are potential matches to the source of the oil.

The Supervisor of Analysis interprets the data from all test methods performed and draws conclusions concerning whether or not certain spilled oil and suspected source samples were derived from the same chemical source. Data interpretation in oil spill source identification is non-trivial and fundamentally different from typical chemical analyses because the chemical properties of spilled oil are altered when oil is introduced into the environment. From the moment oil enters the environment, evaporation, dissolution, photochemical oxidation, biodegradation and other forces begin to alter the oil's characteristics or "fingerprint". These combined processes are termed weathering and can significantly complicate data interpretation. Contamination of the spilled oil with other oils or substances is another complicating factor. The experienced oil spill analyst is familiar with the complexities of the weathering processes and is able to distinguish real differences between two oils from those apparent differences resulting from weathering alterations. Interferences from contaminants can usually be recognized as such and discounted when weighing the test results. However, at times, severe weathering and/or contamination can mask many of the inherent differences between oils of a similar type.

REPORTING

The typical MSL/COIL OIS Report consists of four parts: case identifying information, a listing of analysis techniques performed, the results section and the conclusions section. The results section describes the types of petroleum observed in the samples provided, and comments on chemical similarities or dissimilarities between spill samples and/or between spill and suspected source samples. In all cases the Supervisor of Analysis bases the written results on interpretations from the aggregate of all data generated.

The conclusions section establishes whether or not a common source relationship exists between samples of spilled oil and samples of oil from a suspected source. There are two outcomes most frequently found in the conclusions section of the typical MSL/COIL OIS Report: "derived from a common source" and "not derived from a common source". However, to maintain the high degree of reliability for both "common source" and "not a common source" determinations, it is necessary to exclude some comparisons from these categories. Oil spill cases vary widely in possible explanations for why a determination could not be made. Instead of using only a statement of "inconclusive", the comments will concisely explain the reason for the outcome for each individual case. For example, some sources are highly inhomogeneous, and a sample of such a spill may not reflect the composition of the product remaining in such a source. The spill may contain very little oil, or it may be excessively weathered or contaminated. Of important note, MSL/COIL conclusions address chemical comparisons and not physical aspects of evidence. Additionally, chemical evidence provided in a MSL/COIL conclusion that is other than "common source" might still be used by the investigating officer, when combined with physical evidence to establish a preponderance of the evidence argument against an alleged responsible party.

MSL/COIL OIS Reports are submitted to Marine Safety Offices (MSO's) for inclusion, as chemical evidence, in Marine Violation/Casualty Reports. The outcomes in the conclusions section of the OIS Report define the nature of the chemical evidence provided. MSO personnel are advised to combine the chemical evidence provided in the MSL/COIL OIS Reports with physical and circumstantial evidence developed during the investigation when writing Marine Violation Reports. Inquiries challenging the technical content of MSL/COIL OIS Reports by representatives of the alleged responsible party should be handled at the Hearing Officer level. Explicit guidance describing the communications process between the Hearing Officer and the MSL/COIL Supervisor of Analysis on technical issues involving chemical evidence is given in Commandant (G-LMI) memorandum 16460 dated 26 January 1981.

PERSONNEL QUALIFICATIONS

MSL/COIL laboratory technicians performing sample preparation and testing are graduates of the Coast Guard Marine Science Technician School. Each MSL/COIL technician has successfully completed a comprehensive training program at the MSL/COIL facility. Additionally, many have received supplemental training at leading civilian institutions in their specialty area.

The Supervisor of Analysis monitors all aspects of the analysis, certifies and interprets the test results, and prepares the final MSL/COIL report. This individual is a professionally trained chemist experienced in oil spill source identification. Individuals currently qualified to perform this function are:

Lieutenant Commander Kristy L. Plourde, U.S. Coast Guard Commanding Officer

B.S. Physical Sciences, 1983, US Coast Guard Academy

M.S. Chemistry, 1989, University of Connecticut

Dr. Martha Hendrick

Chemist

B.A. Chemistry, 1969, Rhodes College

M.A. Education, 1974, Stanford University

Ph.D. Analytical Chemistry, 1985, University of Connecticut Chair, ASTM Subcommittee D19.31, Waterborne Oils

REFERENCES

A more technical description of the OIS is contained in Report CG-D-52-77 "Oil Spill Identification System", Final Report, June 1977, USCG R&D Center. This document is available through the National Technical Information Service, Springfield, VA 22161.

For information concerning the ASTM standards used in Oil Spill Identification, consult "Oil in the Environment", Martha S. Hendrick, Ph.D., ASTM Standardization News, April 1991.

For additional information regarding the applicability of the Coast Guard's OIS, see "Chemical Identification of Oil Spill Sources", Allen P. Bentz, Ph.D., The Forum, Volume XIII, Number 2, Winter 1978. Dr. Bentz is a research scientist at the Coast Guard Research and Development Center and a recognized expert in the field of oil spill source identification. He has been closely involved with most of the development work leading to the present state-of-the-art.

APPENDIX C

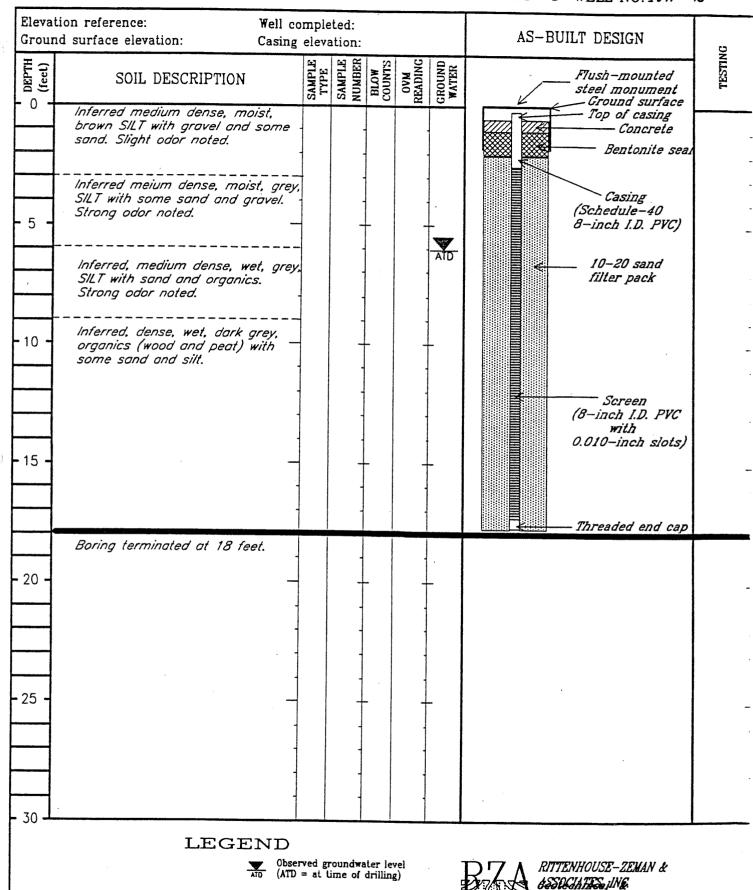
Boring Logs, Monitoring Well Logs, and Test Pit Logs

Appendix B

Lithologic Logs

10.01

Environmental Consultants



Drilling started: 07 November 1991 Drilling completed: 07 November 1991 Logged by: JK

SAMPLING

I 2' OD SPLIT SPOON SAMPLE

3' OD SHELBY SAMPLE

2.5' ID RING SAMPLE

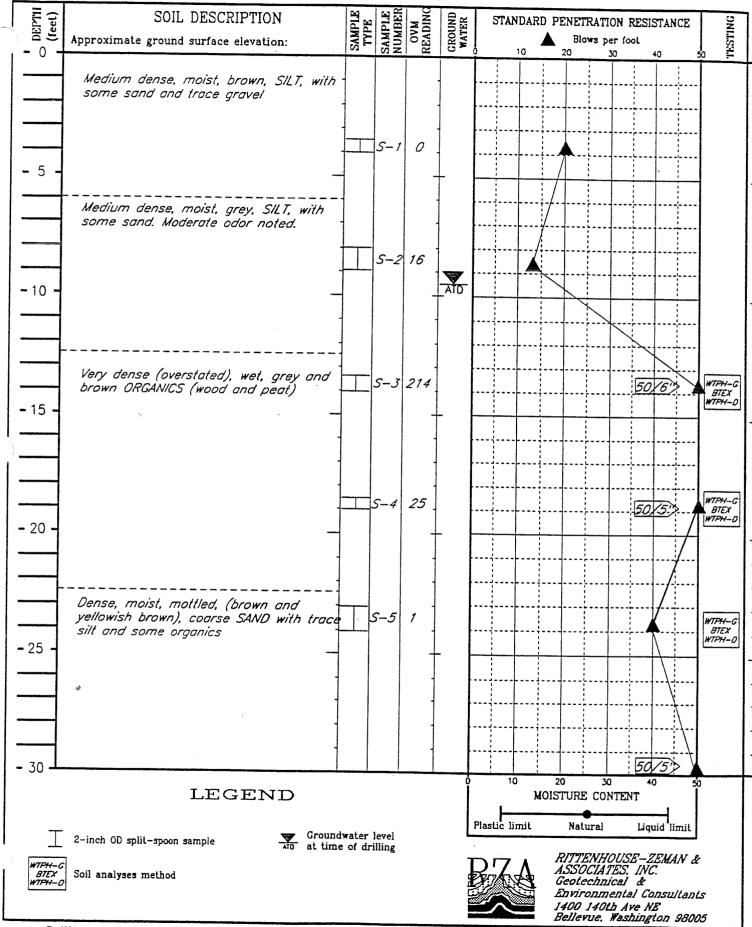
BULK SAMPLE

* SAMPLE NOT RECOVERED

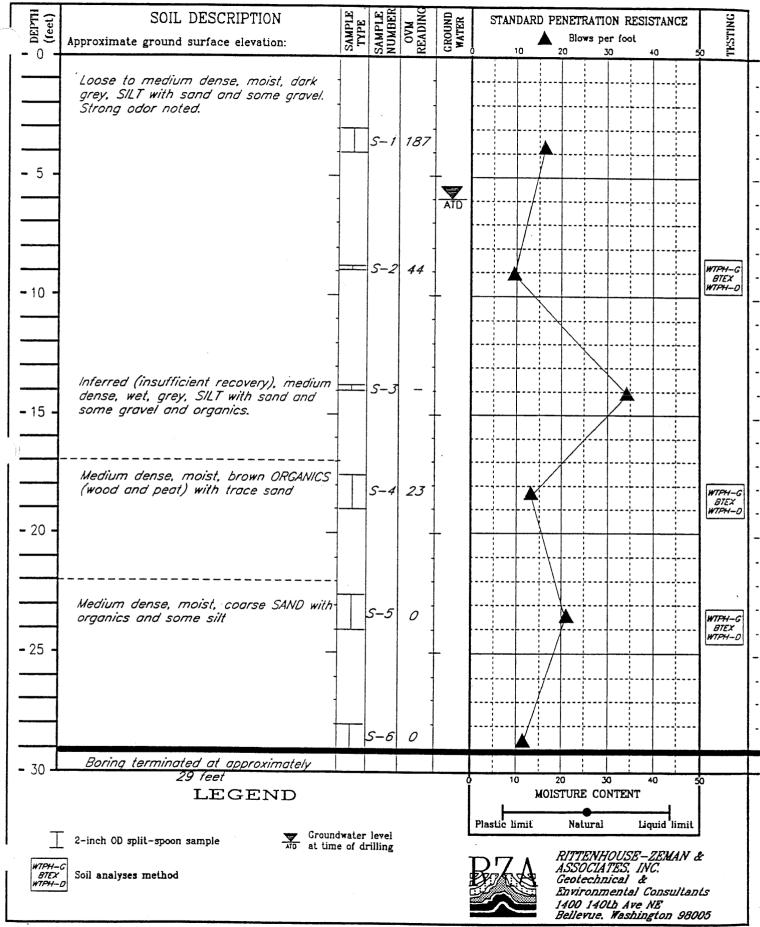
GROUND WATER SEAL
DATE
WATER LEVEL TO OBSERVATION
WELL TIP

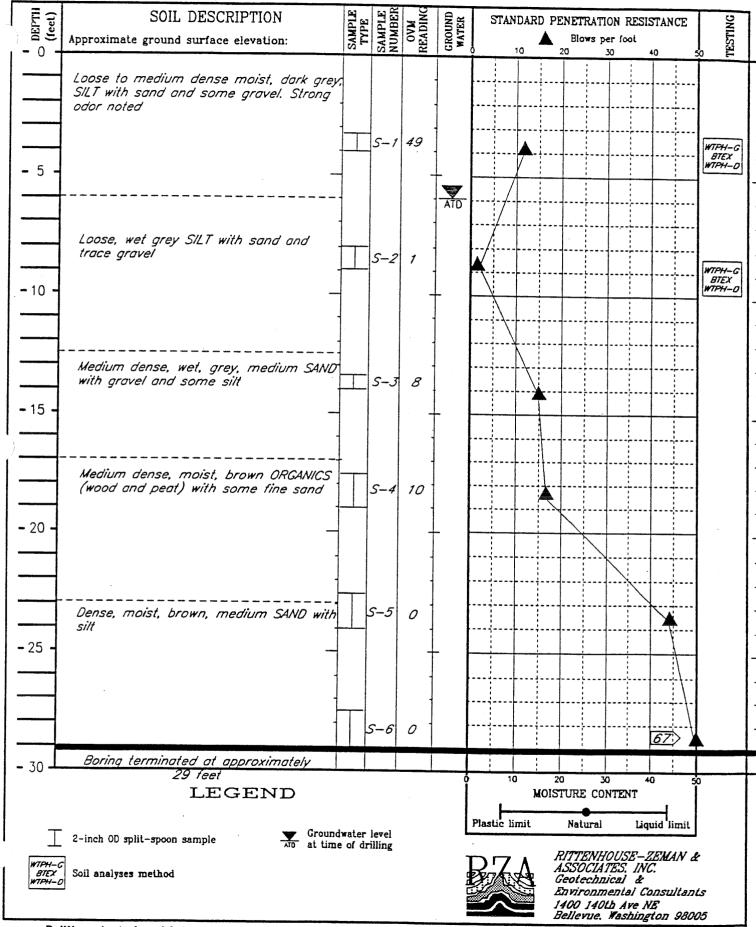
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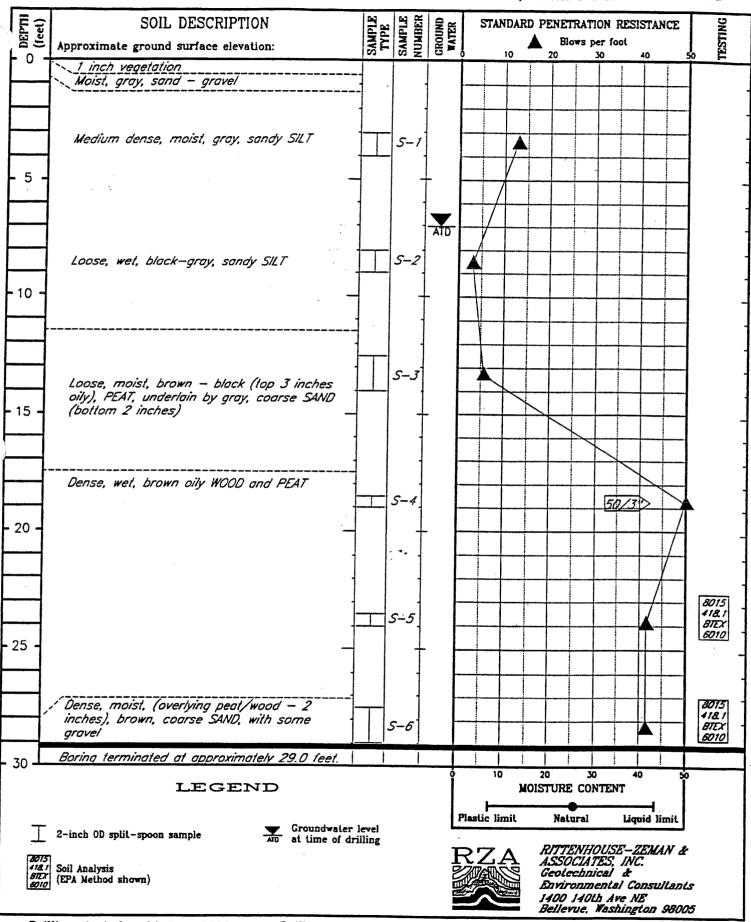
 $^{\perp}$ PLASTIC LIMIT



CPTII (feet)	SOIL DESCRIPTION		SAMPLE	SAMPLE NUMBER	OVM READING	GROUND	STANDARD PENETRATION RESISTANCE	JNL
0 -	Approximate ground surface elevation:					GRC WA	Blows per foot 10 20 30 40 50	TESTING
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Т	2-inch OD split-spoon sample					Į	Plastic limit Natural Liquid limit	
<u>-</u>	men en spine speen sample					- 1 1	RITTENHOUSE – ZEMAN & ASSOCIATES, INC. Geolechnical & Environmental Consultants 1400 140th Ave NE	







PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. B-34 Elevation reference: N/A Well completed: N/A Page 1 AS-BUILT DESIGN Ground surface elevation: N/A Casing elevation: N/A of 1 OVM READING DEPTH (feet) BLOW SOIL DESCRIPTION TESTING 0 Boring abandoned by backfilling with bentonite. Loose, moist, brown, silty, fine to medium SAND interbedded with gray, S-1 5 17 sandy SILT with trace gravel S-2 69 5 ATD S-3 Medium dense to dense, saturated, gray, silty, fine to medium SAND with S-4 41 80 some wood debris 10 Grades to grayish-black, silty, medium to coarse SAND S-5 12 Bottom of boring at 14 feet. 15 Petroleum-like staining and odor observed in all samples. Field FT-IR analysis of sample S-5 indicated > 10,000 ppm TPH. 20 25 30 **LEGEND** RZA AGRA, Inc. 2-inch O.D. Observed groundwater level Geotechnical & Environmental Group split-spoon sample ATD = at time of drilling 11335 NE 122nd Way, Suite 100 3-inch OD Shelby sampler Kirkland, Washington 98034-6918

Bobcat Boring Logs

BB-1

Gray, moist to wet, silty, gravelly SAND with some cobbles. Slow seepage at approximately 1.0 foot; no other seepage encountered; soil exhibits a petroleum hydrocarbon-like odor. No LPH observed. Met with refusal at approximately 3.0 feet.

BB-2

Gray, moist to wet, gravelly SAND. Slow seepage at approximately 1.5 feet; no other seepage encountered; soil exhibits a petroleum hydrocarbon-like odor. Seepage from 1.5 foot depth pooled at bottom of boring and exhibits an irridescent sheen. No LPH observed. Boring terminated at a depth of approximately 4.0 feet.

BB-3

Gray, moist to wet, gravelly SAND with some gravel. Slow seepage below approximately 2.5 feet; soil exhibits a petroleum hydrocarbon-like odor. Discontinuous blebs of LPH observed on water pooled at the bottom of the boring. Boring terminated at a depth of approximately 4.0 feet. Boring allowed to remain open approximately two hours; discontinuous blebs of LPH still present on the water pooled in the bottom of the boring.

BB-4

Gray, moist to wet, silty, gravelly SAND with some wood debris. Slow seepage at approximately 1.0 foot; soil exhibits a petroleum hydrocarbon-like odor. Moderate seepage observed below approximately 3.5 feet. Approximately 0.01 to 0.02 feet of LPH accumulated on groundwater in the boring. Boring terminated at a depth of approximately 4.0 feet.

BB-5

Dark gray, wet, SAND with some silt, gravel, and wood debris. Moderate seepage observed below approximately 3.0 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet; caved to approximately 3.5 feet. Gauged fluid at bottom of boring using Colorcut paste; it appeared to be 100% LPH. Collected two bottles of LPH for potential future laboratory analysis; collected one bag sample of soil for possible sieve analysis.

BB-6

Gray, moist to wet, gravelly, SAND with some silt. LPH seepage observed at approximately 3.8 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste; it appeared to be 100% LPH.

BB-7

Gray, moist to wet, gravelly, SAND with some silt and wood debris. Slow water and LPH seepage observed at approximately 1.0 feet; rapid LPH seepage observed below approximately 3.5 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste; it appeared to be 100% LPH.

Logged By TJP 5/22/96

Page 1

BB-8

Gray, moist to wet, gravelly SAND with some silt; scattered glass shards. LPH observed on tip of auger at approximately 2.5 feet. Slow seepage observed below approximately 3.8 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste approximately one hour after drilling boring; LPH thickness approximately 0.05 feet.

BB-9

Gray, moist to wet, gravelly SAND with some silt. Slow seepage observed at approximately 1.5 feet. Slow seepage observed again below approximately 3.8 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste; fluid appears to be a mixture of LPH and water (stains tape black like LPH but changes Colorcut from yellow to red like water).

BB-10

Gray, moist to wet, gravelly SAND with some silt and cobbles. No seepage observed; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet.

BB-11

Gray, moist to wet, gravelly SAND with some silt. No seepage observed in boring but soil and auger tip appears to be saturated with water; no LPH observed. Soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Boring left open overnight. Fluid level in boring in 5/23/96 was at approximately 3.0 feet. Gauged fluid with Colorcut paste; LPH thickness measured in boring using this method was approximately four inches. Collected two bottles of LPH for potential future laboratory analysis; collected one bag sample of soil for possible sieve analysis.

BB-12

Gray, wet, gravelly SAND with some silt. Rapid seepage observed below approximately 3.0 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Seepage accumulated in the boring to a depth of approximately 2.0 feet. Gauged fluid at bottom of boring using Colorcut paste; LPH thickness approximately 0.01 feet. Collected two bottles of LPH for potential future laboratory analysis.

BB-13

Gray, moist, gravelly SAND overlying saturated %-inch minus round rock at approximately 2.0 feet. LPH on tip of auger when removed from the boring. However, boring caved as fast as the auger was removed; consequently, LPH thickness was indeterminate; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet.

BB-14

Gray, moist, gravelly SAND with some silt and scattered metal debris. No seepage observed; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet.

Logged By TJP 5/22/96

			LOG	OF		Project No: 05-487-002 Boring No: W-1
EXPLORATORY BORING						Date: 2-23-90
						Client: American Distributing Co Driller: Geotech
	ocation of b	ooring:				Location: Bulk Terminal-Everett, Drilling Method: CMEC-55 Hollow Stem Auger
						Logged by: G. Stuesse Hole Diameter: 7"
						Installation Data: (See Below) Page No: 1 of 1
		1	T	T	T	
th	Graphic	Blow/ft	Vapor Concen-	1	Soil Group Symbol	Water Level Time: Date: Comments:
:)	Log		tration		(U.S.C.S.)	
			(ppm)			
_				<u> </u>		
-						0-3.0" Asphalt
-						·
				Ring @	Pt	3.0' Organic debris, silty, brown, loose, moist, primarily
- 6		4.00		3.0'		wood shavings, slight organic odo
- [
- [
- [
- [
- [
- [10.0' Silt, brown, soft, wet, wood shavings, slight odor.
-					ML	
-		1	l			
		ļ				
		İ				15.0' Silt, brown, soft, wet, wood shavings, slight
- 4					ML.	petroleum sheen on cuttings.
- 1			l			postosem anden on enterings.
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		1				
	<u> </u>			-		
	TD=23.0'	P. Colombia	ĺ			
						Installation Data:
			1			Screen: 23.0' - 3.0'
	.					Blank: 3.0' - 0
						Sand: 23.0' - 2.0'
			l			Bentonite: 2.0' - 1.0'
			-			Concrete: 1.0' - 0
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		PV	LOG			Project No:	05-487-002	?	Boring No: W-2
		EA	PLORATOR	BORING		634			Date: 2-22-90
7	location of h			_					Co Driller: Geotech
	TOCACION OI	ooring.				Location: B	ulk Termina	l-Everett	•
									Hollow Stem Auger
						Logged by:			Hole Diameter: 7"
						Installation	n Data: (Se	e Below)	Page No: 1 of 1
			Vapor	Sample type	Soil Group	Water Level	Time:	Date:	Comments:
pth	Graphic	Blow/ft	Concen-	and Depth	Symbol				
ft)	Log		tration		(U.S.C.S.)				-
			(ppm)						
		 							
-			TIP II			0-3" Gravel			
				į	1				cose, very moist, occasional
-					SW				e oily odor, dark brown, oily
-		11	60	Ring @		film on	outside of	sampler.	
-				3.0'					•
- [5.0' Sand,	fine-coarse	e, grey, l	oose, wet, occasional fine
- [sw				ily, odor, dark brown oily fil
-							side of sam		-
-		-							
-		1							
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			- 1			15 0/ 0 4		_	
			1						pose, wet, occasional coarse
Ţ.			1		sw				odor, dark brown oily film
-					-	on cuts	ide of samp	pler.	
-			1	.	[
		1		ľ	Į				
-		1			sw	20.0' Sand, f	ine coarse,	grey, lo	cose, wet, occasional coarse
- lii	liimiimiii	1		-		gravel,	slight-med	iium oily	odor, dark brown oily film
-	,,,,,,,,,,,,,,,		1	1	OF		ide of samp		
- Ш			1	_	:	23.0' Clay,	brown, soft	, wet, po	ssible organic, very slight
-	TD=23.0'	1					c odor.	•	
•			ļ						
-]			13			well cou	ld not be sand packed due to
-						heavin	g sands.		•
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				į]]	installation I	ata:		
		ļ		1		5	creen:	23.0′ -	3.0'
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						s	and:	23.0′ -	
							entonite:		
		1			1		oncrete:		
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		EXI	LOG O			Project No: 05 Client: Ameri			Boring No: W-3 Date: 2-22-90 Driller: Geotech
<u>.</u>	location of b	ooring:				Location: Bulk			
						Logged by: G. Installation D			Hole Diameter: 7" Page No: 1 of 1
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time:	Date:	Comments:
0 -						0-3" Asphalt			
2 -		11		Ring @	SP			, fine-med	ium, grey, loose, moist,
6 - 8 - -					SP			, fine-med , no odor.	ium, grey, loose, wet,
- .2 - - 4 -									
8 -					SP	15.0' Sand, slig			iium, grey, loose, wet,
2 -				-	SP	20.0' Sand, slig occasional			lium, grey, loose, wet,
4 -	TD=23.0'				1	OTE: Vapors fr	com well	have H2S c	dor.
-					I	Bla San Ben	een: ink: id: itonite:	23.0' - 3 3.0' - 23.0' - 2 2.0' - 1 1.0' -	0' .0'
-									
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	and the statement of the statement	 	LOG	OF		Project No:	05-497-	-003		Boring No: W-4
		EXI	PLORATOR'	Y BORING		110,000	03-407-	-003.		Date: 2/22/90
						_ Client: Ame	rican D	Distributin	g Co.	Driller:
í	ocation of h	oring:				Location: Bu	lk Term	ninal		Drilling Method:
						Eve	erett,	WA		Hole Diameter: 7"
						Logged By:				Page No: 1 of 1
						Installation	Data:	See Below		
			Vapor	Sample typ	e Soil Group	Water Level	Time	Date	Commen	
epth	Graphic	Blow/ft	Concen-	and Depth	Symbol					
(ft)	Log		tration		(U.S.C.S.)					
•			(ppm)							
0 -		<u> </u>			-	0 -3" Concret		l		
٠ -										
2 -										
-			ŀ		SM					
4 -		16	0	Ring @ 4'		@ 4' Sand, si	lty, f	ine to medi	um grain	ned, gray/brown, loose,
-						wet, moderate	odor,	film of br	own oil	on sampler.
6 -										
-										
8 -										
-										
0 -		1				@ 10' Sand, s	ilty, f	ine to med	ium grai	ned, gray/brown, loose, wet,
2 -		1				moderate odor	, piece	s of glass	, metal	and wood.
_		ĺ	1							
4 -										
- 4	† 		1			@ 15' Clay, or	ganic.	brown. so:	ft. wet.	pieces of wood, very
6	414141414141		İ			slight odor.	•		,,	process of mood, vor,
- [14444444	1	l		OL					
8 -		-								
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0 -	+ + + + + + 4						ganic,	brown, so	ít, wet,	pieces of wood, very
-	[[4]4]4]4]4]4]				ľ	slight odor.				
2 -										
- L	TD=23'		l							
`	15-23	.	1			Installation D	272.	F=====	227	
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			LOG	OF		Project No:	05-487	-003		Boring No: W-5
		EX	PLORATOR	f BORING						Date: 2/22/90
	12					Client: Ame			ng Co.	Driller:
)	location of h	poring:				Location: Bu				Drilling Method:
						1	erett,	WA		Hole Diameter: 7"
						Logged By:				Page No: 1 of 1
						Installation	Data:	See Below		
			Vapor	,	•	Water Level	Time	Date	Commen	ts:
pth	Graphic	Blow/ft	Concen-	1	Symbol	ļ			.	
(t)	Log		tration	1	(U.S.C.S.)					
			(ppm)							
) -						0 - 6" Gravel	-	l	l	
-										
-										
-		28	50	Ring @ 3'	SP	@ 3' Sand, fi	ne to :	medium gra:	ined, sl:	ightly silty, gray, loose,
-						moist, slight	odor,	pieces of	wood and	d metal.
-			1	l						
-			-			@ 6' Sand, fi	ne to m	edium grai	ined, sli	ightly silty, gray, loose,
-			-		1	wet, slight or	dor, fi	.lm of brow	n oil on	cuttings.
-		1	ł	1						
-			1	1						
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-		1	1	1						
		1								
			l	1	SP 6					
)					SP 6	s is sand, fi	ne to	medium gra	ined, sl	ightly silty, gray, loose,
- 1•			1	ŀ	"	et, slight od	or, II.	im of brow	n oil on	cuttings.
_ :				ļ						
- :										
- :					a	20' Sand. ft	ne to r	adium are	inad ali	ightly silty, gray, loose,
- :					w	et, slight od	or. Cut	tings coat	red with	brown oil film
- :				1		, , , , , , , , , , , , , , , , , , , ,	,	verngo cou.	red with	blown oil lim.
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-	TD=23'			[-						
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-	location of b		LOG (OF Y BORING		Project No: Client: Ame: Location: Bu Eve Logged By: Installation	rican D lk Term erett,	istributin inal WA	g Co.	Boring No: W-6 Date: 2/23/90 Driller: Drilling Method: Hole Diameter: 7" Page No: 1 of 1
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	ts:
0 - 2 - 4	TD=23'	19	30	Ring @ 3'	ÖI.	@ 6' Sand, sl. wet, slight of water and cut: @ 10' Sand, ve slight odor, s water and cut:	ightly dor, so tings. ery sil some gr tings.	some grave, silty, finme gravel, ty, fine tavel, piece	e to med pieces co medium	0 2,

- 1	location of b		LOG (Project No: Client: Am Location: B E Logged By: (Installation	erican D ulk Term verett, G. Stues	Distributin Minal WA Se	ith	Boring No: W- Date: 2/21/90 Driller: Geot Drilling Meth Hollow-: Hole Diameter Page No: 1 of	ech od: CMEC-55 Stem Auger : 7"
th	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	nts:	
	TD=16'	5	TIP# 400	Ring @ 3'	SM	@ 3' Sand, s wet, gravel,	ilty, fi	oily odor.	se grai	ned, gray to da	rk gray, loose

			LOG (Project No:	05-487-	-003		Boring No: W-8	
	ocation of b		PLORATOR	E BORING		Client: Ame Location: Bu Ev Logged By: G	lk Term erett, . Stues	oinal WA sse	g Co.	Date: 6/28/90 Driller: ESE Drilling Method: Hole Diameter: 4' Page No: 1 of 1	
-			Vapor		Soil Group	Water Level	Time	Date	Commen	· · · · · · · · · · · · · · · · · · ·	-
n)	Graphic Log	Blow/ft	Concen- tration	1	Symbol (U.S.C.S.)			<u> </u>			
			(ppm)		(
_					SM	0 - 3' Sand,	silty,	brown, loc	se, mois	t to wet, no odor	•
-					ML	@ 3' - 10' s:	iic, gr	ay, soft, w	et, slig	ht odor.	
	TD=10'					Installation		Screen Blank	10' -		
								Sand	2' - 6	· ·	
								Bentonite Concrete			
								0001 6.0	., .	•	
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	location of b		LOG PLORATOR	OF Y BORING		Project No: Client: Ame Location: Bu Ev Logged By:	rican [Distributir Dinal	ng Co.	Boring No: W-9 Date: 6/28/90 Driller: Drilling Method: Hand Aug Hole Diameter: 7" Page No: 1 of 1	er
Depth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	18	Installation Water Level	Data:	Date	Commen		
0 2 4 6					ML	0 - 3' Silt, 0 3' - 7.5' S					
8 -	TD=7.5'					Installation i		Screen Blank Sand Bentonite Concrete	1.5' - 7.5' - 1.0' -	0 1.0' 0.5'	
-											
-											
-											
-											

	,	EXE	LOG		***************************************	Project No: 0			-,	Boring No: W-10 Date: 6/28/90
	location of h	boring:				Client: Amer Location: Bul Eve Logged By: Installation	k Term rett,	inal WA	g Co.	Driller: Drilling Method: Hand Auger Hole Diameter: 7" Page No: 1 of 1
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	ts:
0 2 4					ML Pt	0 - 2' Silt, b @ 2' - 6' Peat	rown,	moist, pie	oces of v	wood and metal, no odor.
-	TD=6'					Installation D	;	Screen Blank Sand Bentonite	6.0' - 2.0' - 6.0' - 1.5' -	0 1.5'
-										
-						·				
-										
-										
-										

LOG OF Project No: 05-487-003 Boring No: W-11 EXPLORATORY BORING Date: 6/28/90 Client: American Distributing Co. Driller: ocation of boring: Location: Bulk Terminal Drilling Method: Hand Auger Everett, WA Hole Diameter: 7" Logged By: Page No: 1 of 1 Installation Data: See Below Sample type Soil Group Water Level Vapor Date Comments: Graphic 2pth Blow/ft Concenand Depth Symbol 'ft) Log tration (U.S.C.S.) (ppm) 0 - 2' Peat, silty, brown, moist, no odor. Pt @ 2' - 6.5' Peat, brown, wet, brown, oil sheen. TD=6.5' Installation Data: Screen 6.5' - 1.5' Blank 1.5' - 0 6.5' - 1.0' Bentonite 1.0' - 0.5' Concrete 0.5' - 0

			LOG	OF		Project No:	: 05-487	7-003		Boring No: W-12
		EXI	PLORATOR	RY BORING						Date: 6/28/90
						_ Client: An	merican	Distribution	na Co.	Driller:
-< \	location of b	oring:				Location: E	Bulk Ter	minal		Drilling Method: Hand Auger
						•	verett,			Hole Diameter: 7"
						Logged By:				Page No: 1 of 1
						Installatio	n Data:	See Below		
	·		·							
			Vapor	Sample ty	pe Soil Grou	p Water Level	Time	Date	Commen	Ťa.
epth	Graphic	Blow/ft	Concen-	- and Dept						
(ft)	Log	ł	tration	n	(U.S.C.S.)	-		·	
			(ppm)							
							l			
0 -							-1	- !	l	
-					SM	0 - 3' Sand	ail+	hen		- 4
2 -						3 501.0	, silly,	Drown, mo	ist, no	odor.
-							Dase -			
4 -					Pt	1	reat, s	ilità, plom	n, wet, s	slight odor.
-					1					
6 -				1						•
_					1					
8 -	TD=7.5'	1				Tage 13 ::		_		
_						Installation	Data:		7.5′ -	
_	ĺ	j						Blank	1.5' -	
_								Sand	7.5′ -	
								Bentonite		
	ļ	1						Concrete	0.5′-	0
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		EX	LOG (PLORATOR			Project No:	05-487	-003		Boring No: W-13 Date: 6/28/90	
iel	d location of h	ooring:				Logged By:	lk Term erett,	minal WA	ng Co.	Driller: Drilling Method: Hand Au Hole Diameter: 7" Page No: 1 of 1	1ger
				,		Installation		See Below			
epth	:	Blow/ft	Vapor Concen- tration (ppm)	and Depth) Water Level	Time	Date	Commen	ts:	
0 - 2 - 4 - 6 -					ML	cobbles, no o	dor.			Own, moist, occasional	
- 8 - - - - -	TD=7'					Installation	,	Screen Blank Sand Bentonite Concrete		0 1' 5'	
		·						,			
-											

		EX	LOG (Project No:			77. Co	Boring No: Date: 6/28/	
	ocation of h	ooring:				Location: Bu	lk Term erett,	uinal WA	ig Co.		
pth [t]	Graphic Log	Blow/ft	Vapor Concen- tration	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	ts:	
-			(ppm)		ML	0 - 6.5' Silt	, sandy	y, moist to	D Wet, ve	ery slight od	or.
	TD=6.5'	-				Installation		Screen Blank Sand Bentonite Concrete	6.5' - 2.0' - 6.5' - 1.0' - 0.5' -	0 1.0' 0.5'	
	·										

		EXI	LOG PLORATOR	OF Y BORING		Project No:	05-487	-003		Boring No Date: 6/2		
₹ र	location of	boring:				Client: Ame Location: Bu Eve Logged By: Installation	lk Teri erett,	minal WA	g Co.	Driller:	dethod: Hand	Auger
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth		Water Level	Time	Date	Commen	ts:		
0 - - 2 - - 4 - - 6 -					MI	0 - 7' Silt,	some s	and and con	bbles, mo	dist to wet	, slight odo	r.
8 -	TD=7'					Installation [Screen Blank Sand Bentonite Concrete	6.0' - 1.5' - 6.0' - : 1.0' - (0 1.0' 0.5'		
									·			
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		7 22	LOG			Project No:	05-487	-003		Boring No: W-16
		EX	PLORATOR	Y BORING						Date: 6/28/90
	ocation of b					_ Client: Ame	rican D	Distributir	ng Co.	Driller:
•	ocation of i	of flig.				Location: Bu				Drilling Method: Band Auger
						1	erett,	WA		Hole Diameter: 7"
						Logged By:				Page No: 1 of 1
						Installation	Data:	See Below		
			Vapor	Sample typ	e Soil Group	Water Level	Time	Date	Commen	
epth	Graphic	Blow/ft	Concen-					Date	Contine	
ft)	Log	1	tration		(U.S.C.S.)				-	
			(ppm)	1						
			.l							
0 -								•	1	
-				1	ML	0 - 6' Silt,	some sa	and and gra	avel, mo:	ist to wet, occasional
2 -			1			cobbles, oil	on gro	und water	surface.	
-										
4 -					1					
-				1						
6 -										
-	TD=6'					Installation			6' - 2	2'
-	1							Blank	2' - 0	
	1	- 1						Sand	6' - 1	
_		1						Bentonite		
_		1						Concrete	.5' - 0	•
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LOG OF Project No: 05-487-003 Boring No: W-17 EXPLORATORY BORING Date: 6/28/90 Client: American Distributing Co. Driller: location of boring: Location: Bulk Terminal Drilling Method: Hand Auger Everett, WA Hole Diameter: 7" Logged By: Page No: 1 of 1 Installation Data: See Below Vapor Sample type Soil Group Water Level Date Comments: Symbol Blow/ft Concenand Depth Jepth Graphic (ft) Log tration (U.S.C.S.) (ppm) 0 - 6' Silt, some sand and gravel, moist to wet, occasional ML cobbles, oil on ground water surface. Installation Data: Screen 6' - 2' 2' - 0 Blank Sand 6' - 1' Bentonite 1' - .5' Concrete .5' - 0

Mobil Oll/ADC Bulk W.O. 11-04558-09 WELL NO. GP-1 PROJECT: Plant Properties Elevation reference: Unknown Well completed: 19 March 1996 Page 1 AS-BUILT DESIGN Ground surface elevation: Unknown of 1 Casing elevation: Unknown SAMPLE NUMBER BLOW COUNTS SAMPLE TYPE OVM READING DEPTH (cet) Flush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Gravel Surfacing over moist, brown, sitty, Top of casing gravelly SAND, non-odorous **Asphalt** Weathered, red clay brick **Bentonite** GP-1/ Moist, brown, silty, fine SAND with some 0.0 3.0 Castna gravel and minor brick fragments (Schedule-80 1-Inch I.D. PVC) 5 Moist to wet, gray, fine to medium SAND. 10-20 sand petroleum odor at 7.0 feet filter pack GP-1/ 27.0 8.0 Grades to wet, gray, fine to coarse SAND Screen (3-Inch fine sandy sitt layer at 10.0 feet) (1-inch I.D. PVC GP-1/ 10 7.0 WIPH-D with 10.0 0.028-Inch slots) Slip end cap Bottom of boring at 12 feet. 15 20 25 **LEGEND**

Z-inch O.D. Geoprobe sample Observed groundwater level

AGRA
Earth & Environmental

11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918

Cheerved groundwater level
AID = at time of drilling

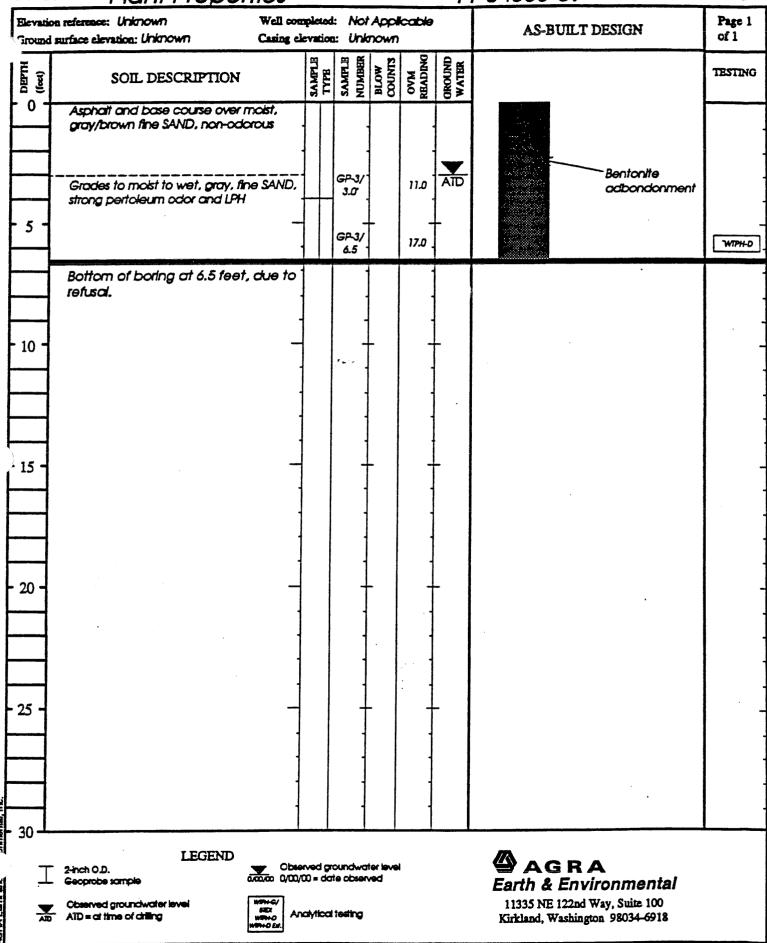
Analytical testing

W.O. 11-04558-09 WELL NO. GP-2 Plant Properties PROJECT: Page 1 Well completed: 19 March 1996 Elevation reference: Unknown AS-BUILT DESIGN of 1 round surface elevation: Unknown Caring elevation: Unknown OVM READING Flush-mounted DEPTH (feet) TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt and base course over moist. Top of casing gray/brown, sitty, gravelly SAND Asphalt Moist, gray, fine to coarse SAND with **Bentonite** some sitt, non-odorous GP-2/ 0.0 3.5 Cadna Grades to gray/brown, sity, fine to (Schedule-80 medium SAND, non-odorous 1-inch I.D. PVC) 5 10-20 sand filter pack 11.0 2-inch fine sandy SILT layer at 7.3 feet GP-2/ 8.0 Grades to saturated, stained black, fine Screen to medium SAND, strong petroleum (1-inch I.D. PVC odor and LPH globules with 10 0.028-inch slots) GP-2/ Fine SAND interbedded with fine wood 11.0 WTPH-D 11.0 Slip end cap fragments Bottom of boring at 12 feet. 15 20 25 **LEGEND ⇔**AGRA Observed groundwater level 2-inch O.D. acción 0/00/00 = date observed Earth & Environmental Geoprobe sample 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing Kirkland, Washington 98034-6918

ATD = at time of atting

PROJECT: Plant Properties

W.O. 11-04558-09 WELL NO. GP-3



W.O. 11-04558-09 WELL NO. GP-4 Plant Properties PROJECT: Well completed: 19 March 1996 Page 1 Elevation reference: Unknown AS-BUILT DESIGN of 1 Casing elevation: Unknown Fround surface elevation: Unknown OVM RBADING BLOW Rush-mounted DEPTH (feet) TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt over base course over Top of casing gray/brown, gravelly, silty SAND, non-odorous Cement Aschalt Moist, brown/black/gray, silty, fine to GP-4/ Cadna 0.0 medium SAND with some gravel, wood 4.0 (Schedule-80 and brick fragments, non-odorous 1-Inch I.D. PVC) 5 Moist to wet, gray/brown, fine SAND, GP-4/ WIPH-D moderate petroleum odor 7.0 6.0 10-20 sand filter pack Wood debris and LPH GP-4/ 11.0 Screen 8.0 (1-Inch I.D. PVC with 10 Fine grained wood fragments, slight 0.028-inch slots) petroleum staining and odor Silp end cap Bottom of boring at 12 feet. 15 20 25 30 **LEGEND** AGRA Observed groundwater level 2-inch O.D. Earth & Environmental 0,00,00 = date observed Geoprobe sample

Observed groundwater level

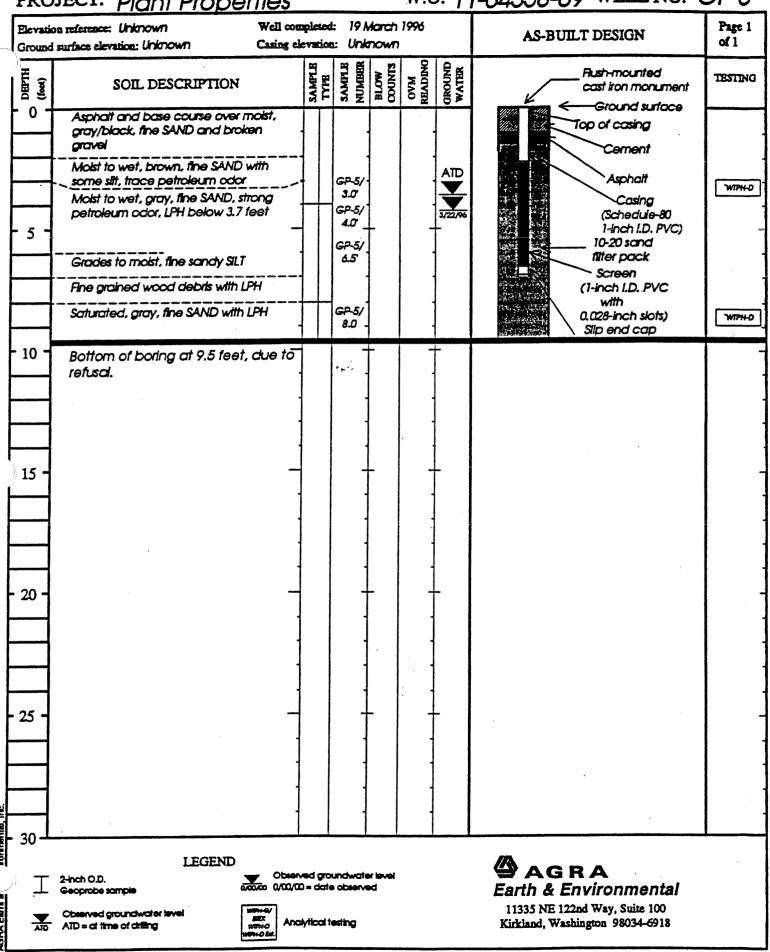
ATD = at time of drilling

Analytical testing

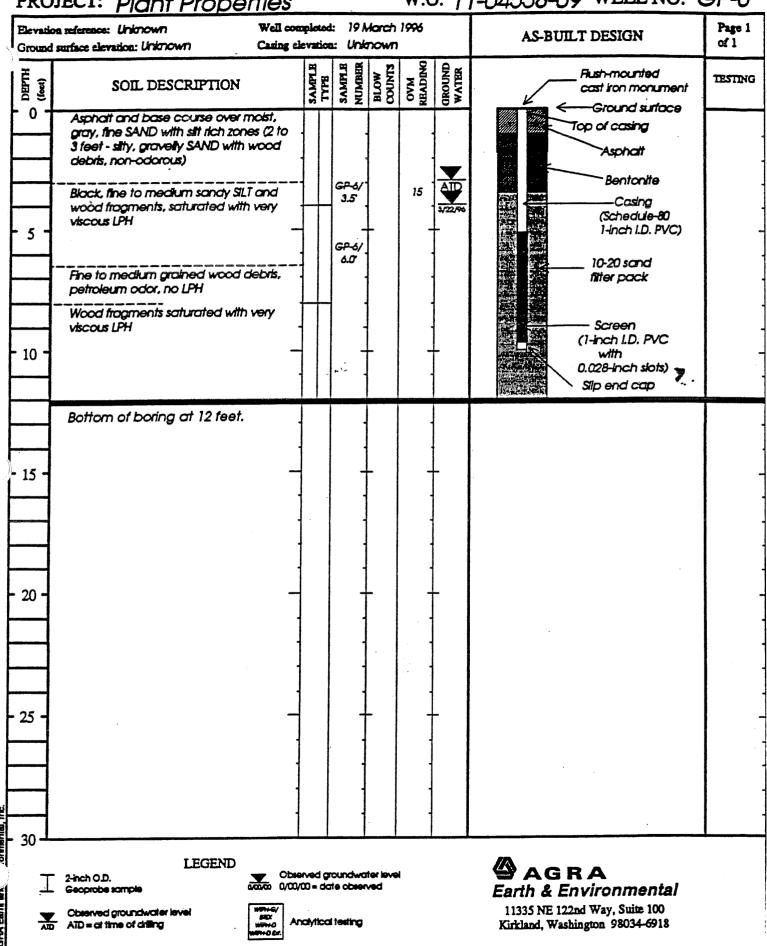
11335 NE 122nd Way, Suite 100

Kirkland, Washington 98034-6918

PROJECT: Plant Properties W.O. 11-04558-09 WELL NO. GP-5



PROJECT: Plant Properties W.O. 11-04558-09 WELL NO. GP-6



Mobil Oll/ADC Bulk W.O. 11-04558-09 WELL NO. GP-7 PROJECT: Plant Properties Well completed: Not Applicable Page 1 Elevation reference: Unknown AS-BUILT DESIGN of 1 Ground surface elevation: Unknown Casing elevation: Unknown SAMPLE TYPE SAMPLE NUMBER OVM READING BLOW OROUND WATER DEPTH (feet) TESTING SOIL DESCRIPTION 0 Asphalt and base course over moist, brown, fine SAND with some sit (5-inch sandy SILT layer at 3.0 feet). non-odorous Bentonite GP-7/ adbondonment AID 40 Moist, brown, sitty, gravelly SAND with wood debris and very viscous LPH WTPH-G/ GP-7/ 5 grading to fine grained wood debris ETFY 5.5 WIPH-D Ed. Bottom of boring at 7.0 feet, due to refusal. 10 15 20 25 LEGEND AGRA Observed groundwater level 2-inch O.D. Devreedo etce consorved

Drilling started: 20 March 1996

Observed groundwater isvel

ATD = at time of drilling

Geoprobe sample

Drilling completed: 20 March 1996

Analytical testing

Logged by: CCC

Earth & Environmental

11335 NE 122nd Way, Suite 100

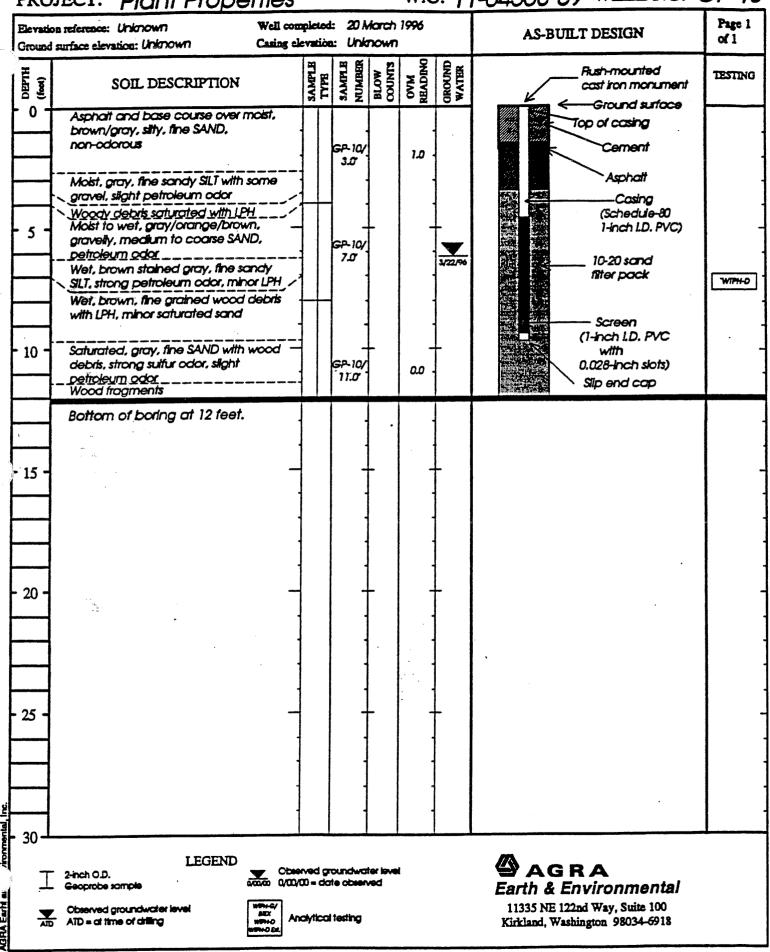
Kirkland, Washington 98034-6918

PROJECT:

W.O. 11-04558-09 WELL NO. GP-8 Plant Properties Well completed: 20 March 1996 Page 1 Elevation reference: Unknown AS-BUILT DESIGN Ground surface elevation: Unknown Casing elevation: Unknown of 1 OVM READING BLOW DEPTH (feet) Flush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt and base course Top of casing GP-8/ **Asphalt** 3.0 **Bentonite** Minor recovery, moist, dark gray SAND. slight petroleum odor 3/22/96 Cadna Molst, black to gray/green, fine sandy (Schedule-80) SILT with wood debris, 1" thick zone of 1-Inch I.D. PVC) 5 LPH 10-20 sand GP-8/ filter pack 11 Fine grained wood debris saturated with 9.0 Screen LPH over gray/green SILT WIPH-G/ (1-inch I.D. PVC ETEX with WIPH-D Bd Mionr recovery - sitty, fine SAND over 0.028-inch slots) fine grained wood debris, petroleum odor 10 Stip end cap Bottom of boring at 11 feet. 15 20 25 LEGEND AGRA Observed groundwater level 1-inch O.D. 0/00/00 = date observed Earth & Environmental Geoprobe sample 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing ATD = at time of drilling Kirkland, Washington 98034-6918

W.O. 11-04558-09 WELL NO. GP-9 Plant Properties PROJECT: Well completed: 20 March 1996 Elevation reference: Unknown Page 1 AS-BUILT DESIGN Caring elevation: Unknown of 1 Ground surface elevation: UnithOWN BLOW OVM DEPTH (feet) Flush-mounted TESTING SOIL DESCRIPTION cost iron monument 0 Ground surface Asphalt and base course Top of casing **Asphalt Bentonite** Trace recovery; minor gravel and wood fraaments Casina (Schedule-80 5 1-inch L.D. PVC) 3/22/96 Minor recovery; moist, gray, fine SAND 10-20 sand over minor wood debris and sandy SILT filter pack with gravel, strong petroleum odor WIPH-G/ MEY GP-9/ 3.0 VIPH-D Bd 8.0 Screen WIPHD (1-Inch I.D. PVC 10 0.028-inch slots) Silp end cap No recovery Bottom of boring at 12 feet. 15 20 25 **LEGEND** 🖴 AGRA Observed groundwater level 2-inch O.D. acción 0/00/00 = date observed Earth & Environmental Geoprobe sample 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing Kirkland, Washington 98034-6918 ATD = at time of drilling

PROJECT: Plant Properties W.O. 11-04558-09 WELL NO. GP-10



W.O. 11-04558-09 WELL NO. GP-11 PROJECT: Plant Properties Elevation reference: Unknown Well completed: 20 March 1996 Page 1 AS-BUILT DESIGN of 1 Ground surface elevation: UNICOWN Casing elevation: Unknown SAMPLE NUMBER OVM READING BLOW GROUND WATER DEPTH (feet) Rush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface n Asphalt and base course over moist, Top of casing brown, sitty, fine SAND, non-odorous GP-11/ **Asphalt a**o 3.0 **Bentonite** Moist, gray, sitty, fine SAND with mottling and some shells and wood debris -Casing Moist, tan grading to gray, fine sandy (Schedule-80 SILT with interbedded wood debris, slight 5 1-inch I.D. PVC) petroleum odor at 4.0 feet 45 Wet to saturated, brown, sitty, gravelly 10-20 sand WIPH D SAND, strong petroleum odor, minor LPH filter pack WIPH-G/ MEX Saturated, black, fine SAND, trace WTPH-D WIPH-D Bd. petroleum odor 0.0 8.0 Screen (1-Inch I.D. PVC 10 with 0.028-inch slots) SP-11/ Sip end cap 12.0 Bottom of boring at 12 feet. 15 20 25 **LEGEND 4**AGRA Observed groundwater level 2-inch O.D. CONTROL O/00/00 = date observed Geoprobe sample Earth & Environmental 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing ATD = at time of drilling Kirkland, Washington 98034-6918

W.O. 11-04558-09 WELLNO. GP-12 PROJECT: Plant Properties Elevation reference: Unknown Well completed: 20 March 1996 Page 1 AS-BUILT DESIGN of 1 Casing elevation: Unknown Ground surface elevation: Unknown SAMPLE OVM RBADING BLOW DEPTH (feet) Rush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt and base course over moist, Top of cosing black, gravelly SAND, slight petroleum odar Cement Moist, gray/brown, fine to coarse SAND grading to brown, fine SAND with some **Aschalt** gravel, non-odorous Casina (Schedule-80 1-inch LD. PVC) 5 10-20 sand SP-12/ 8.0 filter pack Screen (1-Inch I.D. PVC with 0.028-inch stots) :D.12/ Wet, gray stained globules black, fine 10.0 10 SAND with gravel, strong petroleum GP-12/. odor and minor LPH globules WITHO 11.0 Stip end cap GP-12/ Saturated, gray, fine SAND with some 3.2 WIPHO 12.5 gravel, strong petroleum odor, minor alobules of LPH 15 Bottom of boring at 14 feet. 20 25 LEGEND △ AGRA Observed groundwater level 2-inch O.D. 0/00/00 = date observed Earth & Environmental Geoprobe somple 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing Kirkland, Washington 98034-6918 ATD = at time of drilling

PROJECT: Plant Properties W.O. 11-04558-09 WELL NO. GP-13 Elevation reference: Unknown Well completed: 20 March 1996 Page 1 AS-BUILT DESIGN Ground surface elevation: Unknown Casing elevation: Unknown of 1 SAMPLE BLOW OVM 3 SOIL DESCRIPTION TESTING 0 Asphalt over dense, moist, gray, gravely, fine to coarse SAND. non-odorous 3P-13/ 3.5 Bentonite adbandonment 5 Grades to moist, gray/black, gravelly, fine to medium SAND, non-odorous WIPH-D 7.0 WIPH-G/ VIPH-D Ed SP-13/ 10 ATD WIPH-D Wet/saturated, gray/black, sitty, fine 10.0 SAND with some gravel and some wood debris, organic odor Bottom of boring at 12 feet. 15 20 25 30 LEGEND **⇔**AGRA 2-inch O.D. Observed groundwater level ovava o/00/00 = date observed Geoprobe sample Earth & Environmental Observed groundwater leval 11335 NE 122nd Way, Suite 100

ATD = of time of drilling

Analytical testing

Kirkland, Washington 98034-6918

RITTENHOUSE-ZEMAN & ASS Geotechnical / Hydrogeological C	OC.,	INC. Itants				NAME				Ever			1558-1 'lant		-
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Geotechnical / Hydrogeological	Consu	ltant:	5	PRO	JECT	NAME		bil ()il -	Ever	ett E	Bulk F	'lant	
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Geotechnical / Hydrogeolog			Т	PRO	JECT	NAM	E _M	obil	0il -	Eve	rett (Bulk	Plant	
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RITTENHOUSE-ZEMAN Geotechnical / Hydrogeolog	gical Con	sult	ants	1		JECT					Ever	w.o. ett B		558-1 lant	
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WELL TIP

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-NATURAL WATER

CONTENT

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RITTENHOUSE-ZEMAN Geotechnical / Hydrogeolog	& ASSOC., j gical Consult	INC. ants			IUMBE NAME			il -	Ever			<u>558-1</u> lant	
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WELL TIP

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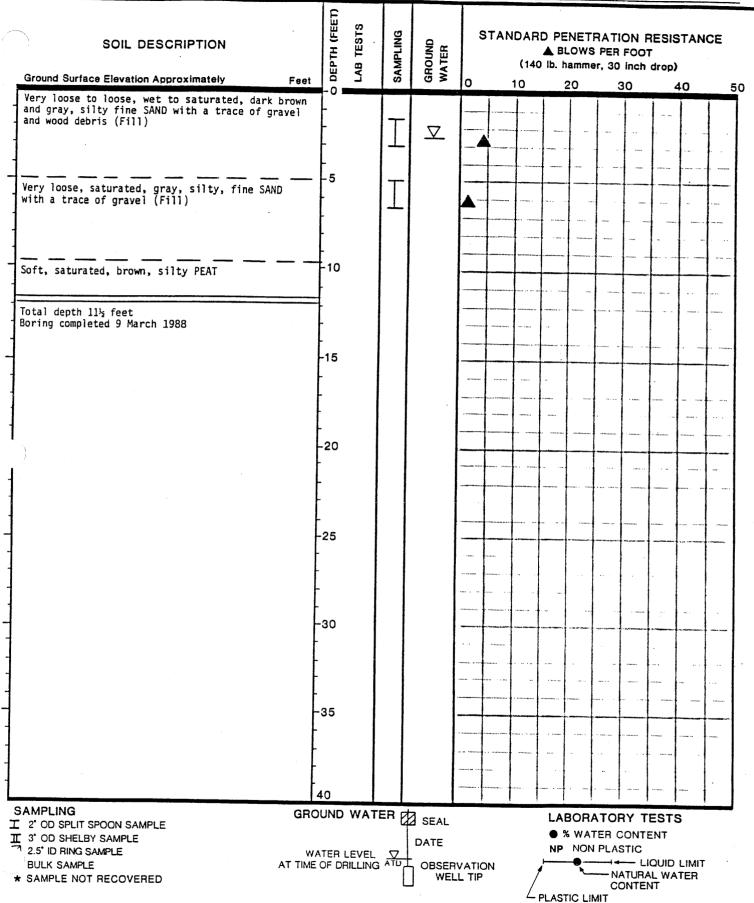
NATURAL WATER

- PLASTIC LIMIT

BORING NUMBER MW-15

W.O. <u>W-4558-1</u>

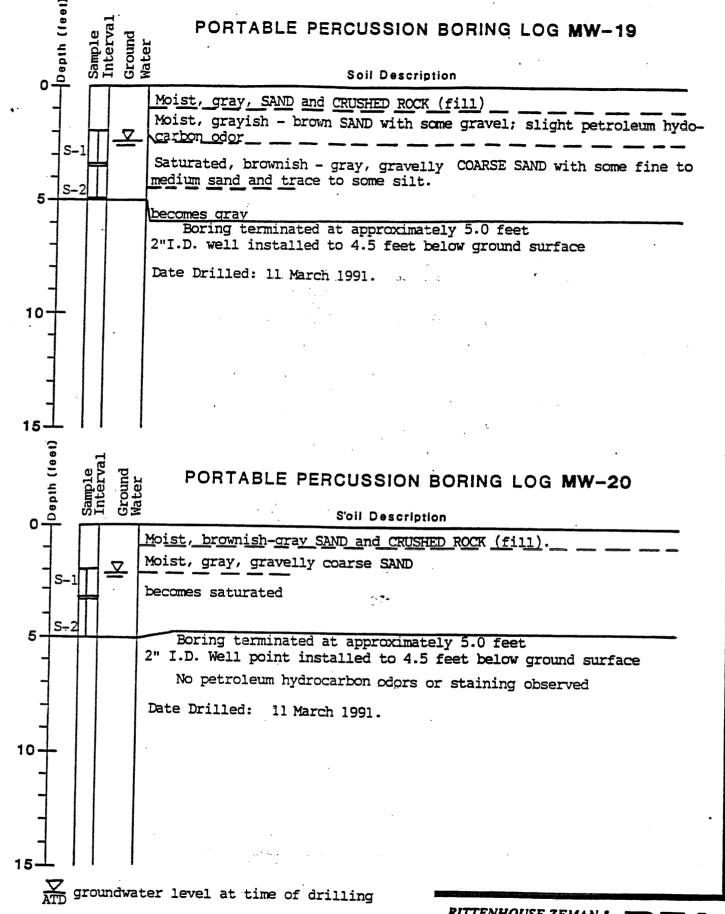
PROJECT NAME _Mobil Oil - Everett Bulk Plant



RITTENHOUSE-ZEMAN & Geotechnical / Hydrogeolog	ical Consu	iltants				NAME				- Eve			4558- Plant	
SOIL DESCRIPTION	DEPTH (FEET)	3 TESTS	SAMPLING	GROUND	5	STAN		▲ B	LOW:	S PEF	1 F00	RESIS	STAN	ICE
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Geotechnical / Hydrogeolog	zicai con	_	iunis	T	PHO	JECT	NAM	E	0011	ווט	- Eve	rett	Bulk	Plant	
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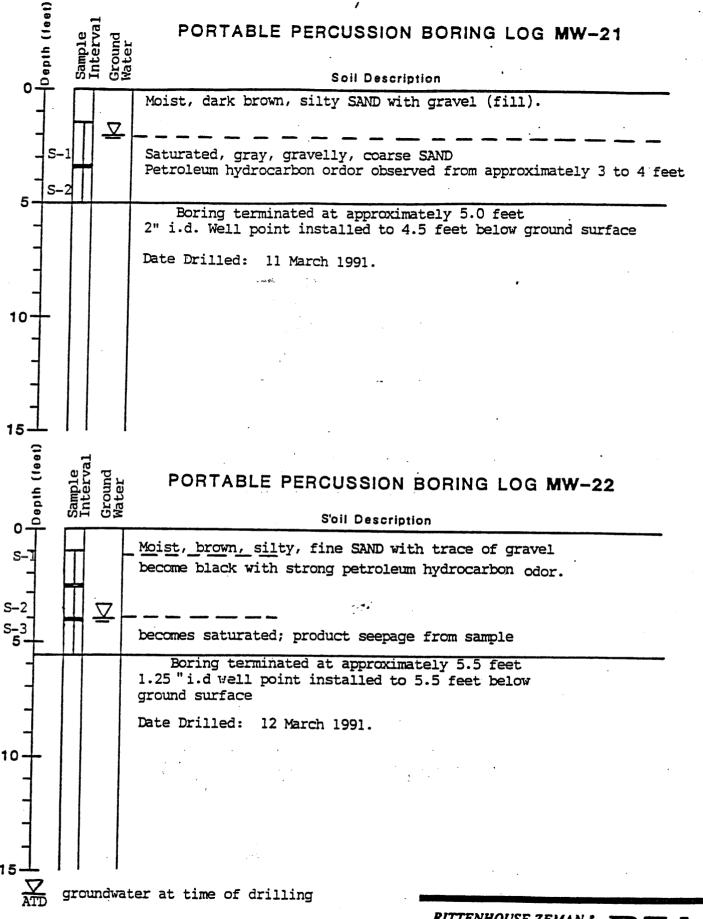
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RITTENHOUSE-ZEMAN & ASSOCIATES, INC.
Geotechnical Consultants
1400 140th N.E.
Bellerue, Washington 98007

(206) 746-8020



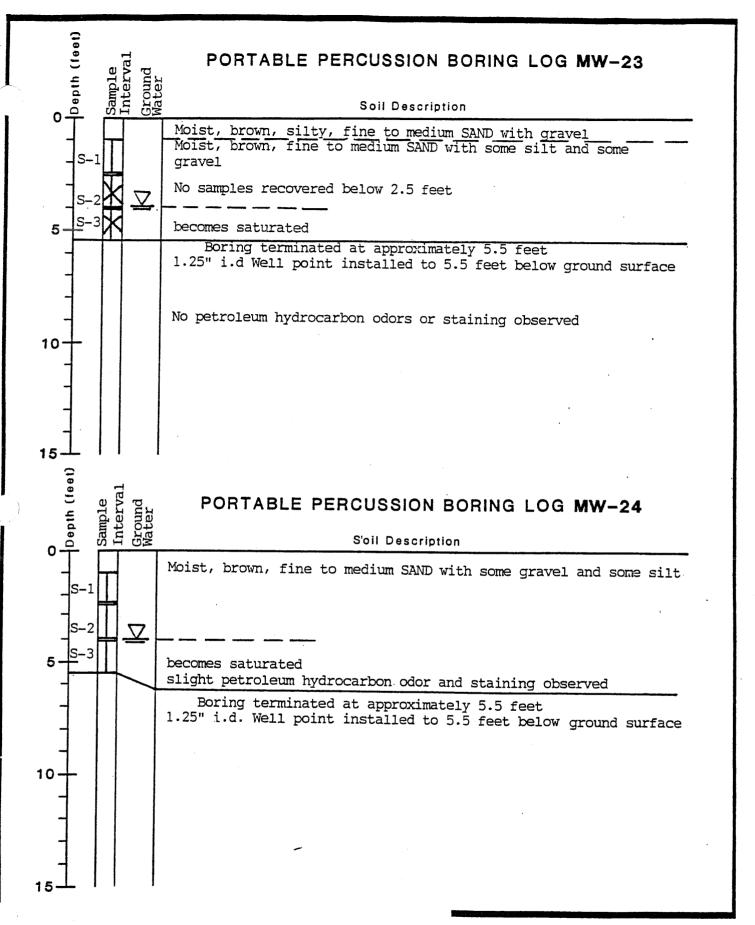


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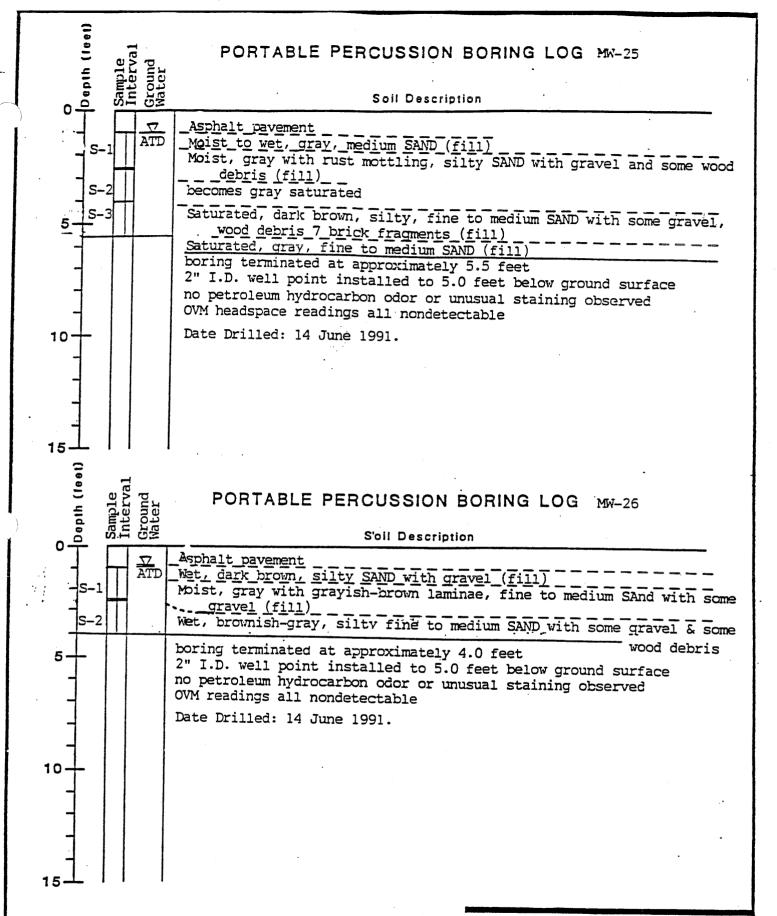




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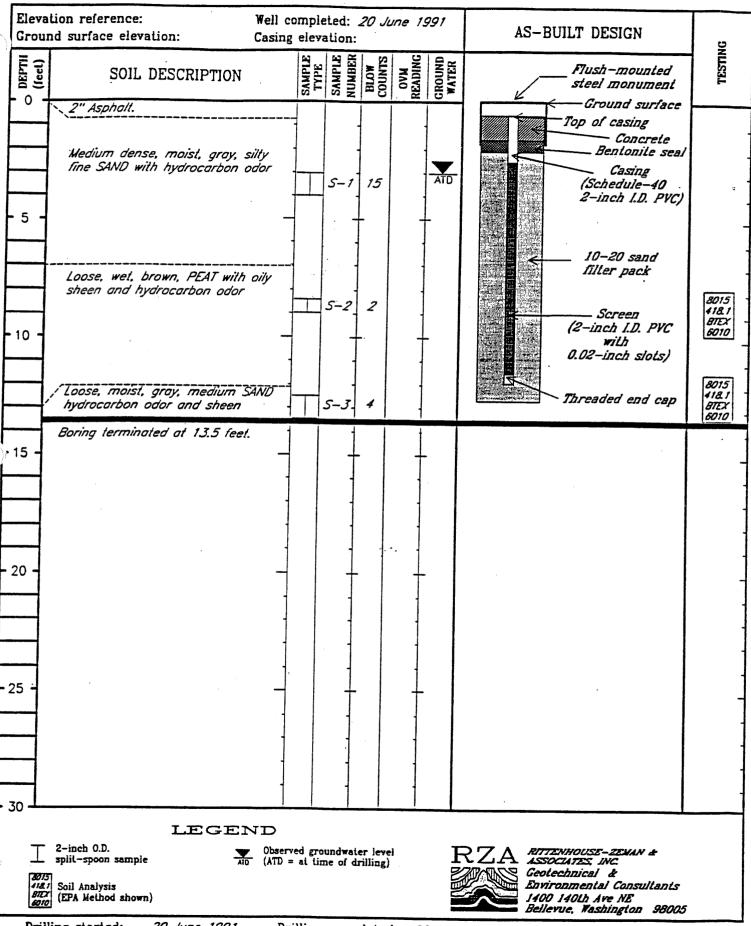


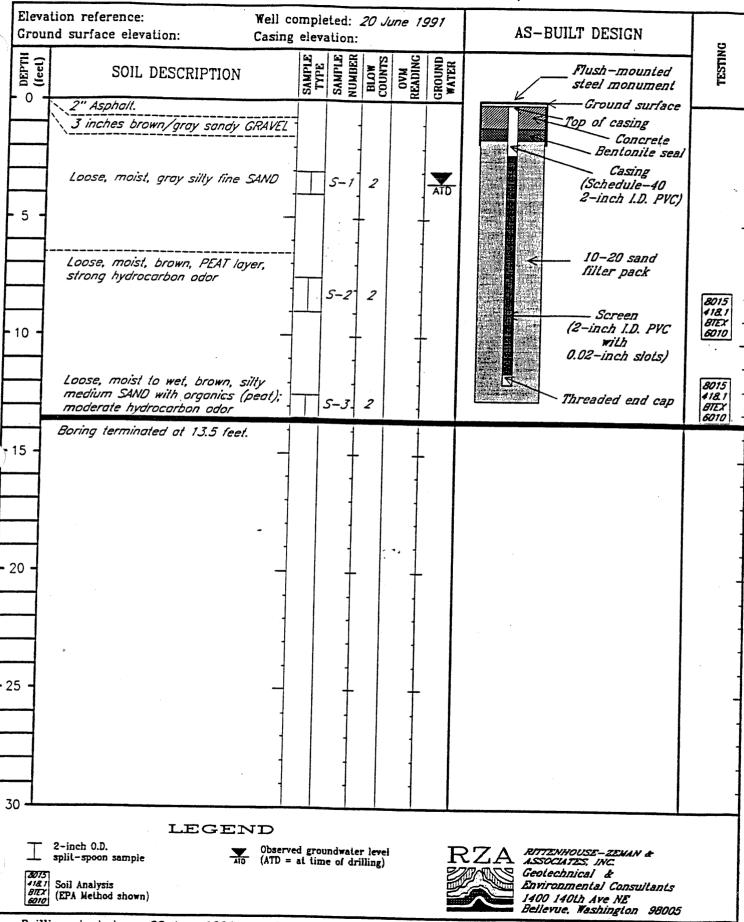
▼ groundwater level at time of drilling

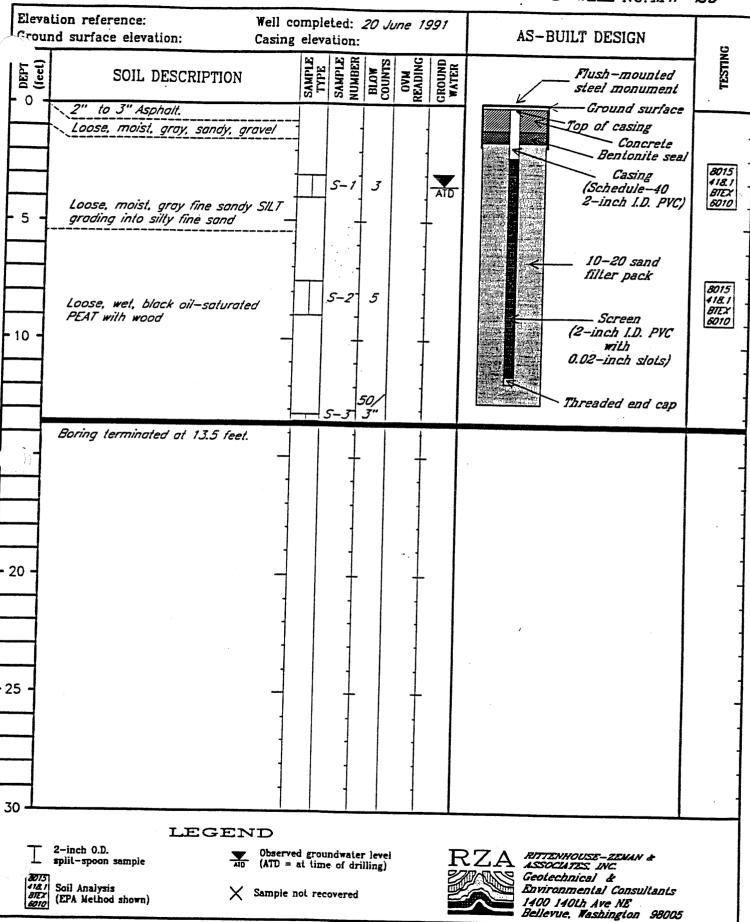
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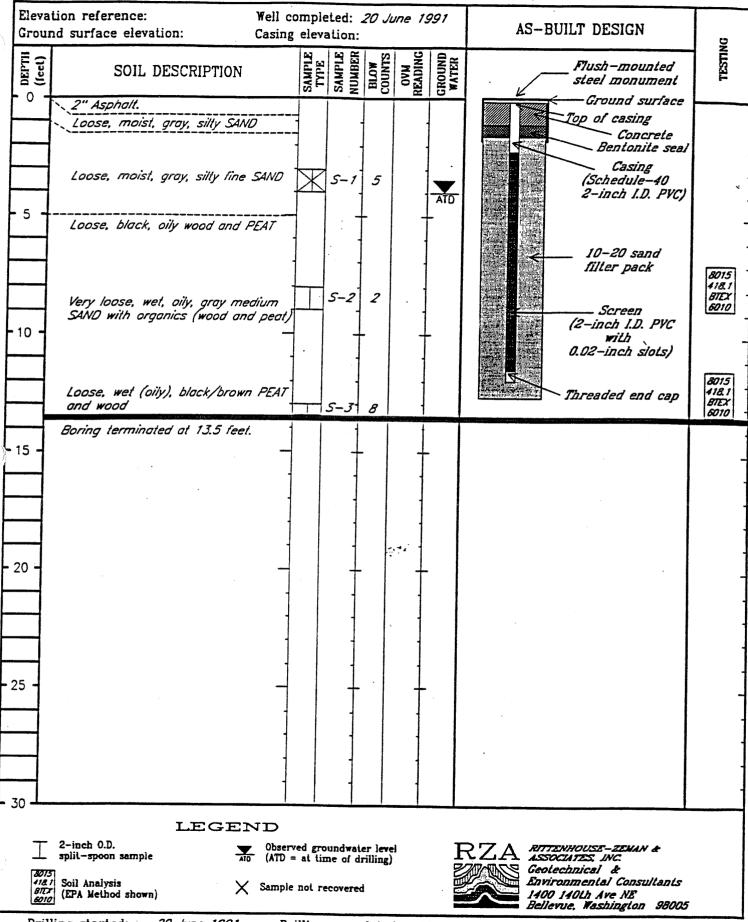
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PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-3 Elevation reference: 100.00 feet Well completed: 07 December 1993 Ground surface elevation: Unknown Page 1 AS-BUILT DESIGN Casing elevation: 98.58 feet of I DEPTH (feet) SAMPLE NUMBER SAMPLE TYPE OVM READING BLOW SOIL DESCRIPTION Flush-mounted TESTIN steel monument 0 Asphaltic Concrete Ground surface Top of casing Cement Medium dense, wet, brownish-gray, fine SAND with gravel (Fill). Slight pertoleum-S-1 Bentonite 25 5 like odor observed Casing 5 (Schedule-40 2-inch I.D. PVC) 10-20 sand 12/8/93 filter pack Loose, wet to saturated, dark greenishgray, SAND with some gravel and wood S-2 6 5 debris (Fill) Screen 10 (2-Inch I.D. PVC with 0.010-inch slots) Medium dense, saturated, dark gray, medium SAND with wood debris S-3 22 5 Riveted slip cap 15 Bottom of boring at 15 feet. 20 25 30 LEGEND RZA AGRA, Inc. 2-inch O.D. Geotechnical & Environmental Group split-spoon sample Observed groundwater level 0/00/00 = date observed 11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918 Drilling started:

07 December 1993

Drilling completed:

07 December 1993

Logged by:

TJP

PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-32 Elevation reference: 100.00 feet Well completed: 07 December 1993 Page 1 Ground surface elevation: Unknown AS-BUILT DESIGN Casing elevation: 99.17 feet of 1 SAMPLE NUMBER OVM READING DEPTH (fect) SAMPLE TYPE BLOW GROUND WATER SOIL DESCRIPTION Flush-mounted TESTING steel monument 0 Ground surface Gravel surface Top of casing Cement Mediun dense, wet to saturated, greenish-gray, gravelly, medium SAND Bentonite S-1 13 5 12/8/93 - Casing (Schedule-40 5 2-inch-I.D. PVC) 10-20 sand filter pack Medium dense, saturated, grayish-dark brown, medium SAND with gravel, some S-2 17 5 silt and wood fragments Screen 10 (2-inch I.D. PVC with 0.010-inch slots) Medium dense, saturated, grayish-dark brown, silty, fine to medium SAND with S-3 17 5 Riveted slip cap some gravel and wood fragments 15 Bottom of boring at 15 feet. No unusual staining or petroleumlike odors observed. 20 25

LEGEND

2-inch O.D. split-spoon sample

Observed groundwater level 0/00/00 = date observed

RZA AGRA, Inc. Geotechnical & Environmental Group

11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918

30

PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-35 Elevation reference: 100.00 feet Well completed: 07 December 1993 Ground surface elevation: Unknown Page 1 Casing elevation: 97.64 feet AS-BUILT DESIGN of 1 DEPTH (feet) SAMPLE TYPE SAMPLE NUMBER BLOW COUNTS OVM READING GROUND WATER SOIL DESCRIPTION Flush-mounted TESTING steel monument 0 Asphaltic Concrete Ground surface Top of casing Cement Medium dense, wet to saturated, gray, medium to coarse SAND with some S-1 12/8/93 21 Bentonite 5 gravel (Fill) Casing 5 Medium dense, saturated, greenish-gray, (Schedule-40 2-inch I.D. PVC) silty, fine to medium SAND (Fill) S-2 11 5 10-20 sand filter back Loose, saturated, brown, silty PEAT S-3 5 5 Screen 10 Loose to medium dense, saturated, gray (2-inch I.D. PVC to brownish-gray, SAND with trace to with S-A 8 5 0.010-inch slots) some silt, gravel and wood fragments (Chunk of wood stuck in sample tube; \$-5_ blow count probably not representative) 50/ S-5 5 Riveted slip cap 15 S-6 11 5 S-7 5 20 S-8 10 Native soil 5 backfill (caved) 5-9 17 5 25 S-10 14 5 Very stiff, saturated, brown, clayey SILT with organics (PEAT-Like) S-11] 17 5 Bottom of boring at 29 feet. 30 -No unusual staining or petroleumlike odors observed. **LEGEND**

RZA AGRA, Inc. Geotechnical & Environmental Group 2-inch O.D. Observed groundwater level 0/00/00 = date observed 11335 NE 122nd Way, Suite 100 split-spoon sample Kirkland, Washington 98034-6918 Drilling stanted: 07 December 1993 Drilling completed: 07 December 1993 Logged by: ΤJP

PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-35 Elevation reference: 100.00 feet Well completed: 06 December 1993 Page 1 Ground surface elevation: Unknown AS-BUILT DESIGN Casing elevation: 103.96 feet of 1 OVM READING SAMPLE TYPE SAMPLE NUMBER DEPTH (feet) GROUND WATER BLOW SOIL DESCRIPTION Flush-mounted TESTING steel monument 0 Ground surface Top of casing Cement Dense, moist, gray, sitty, fine to medium SAND with some gravel Bentonite S-1 38 0 Casing (Schedule-40 5 2-inch I.D. PVC) 12/8/93 10-20 sand filter pack Loose, moist to saturated, gray, fine sandy SILT with some gravel S-2 6 0 Screen 10 (2-inch I.D. PVC with 0.010-inch slots) S-3 4 Ò Riveted slip cap 15 Bottom of boring at 15 feet. Field FT-IR analysis of samples S-1 and S-2 Indicated TPH concentrations of <50 ppm. 20 25 30 LEGEND RZA AGRA, Inc.
Geotechnical & Environmental Group 2-inch O.D. split-spoon sample Observed groundwater level 0/00/00 = date observed 11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918

Drilling started:

06 December 1993

Drilling completed:

06 December 1993

Logged by:

GKS

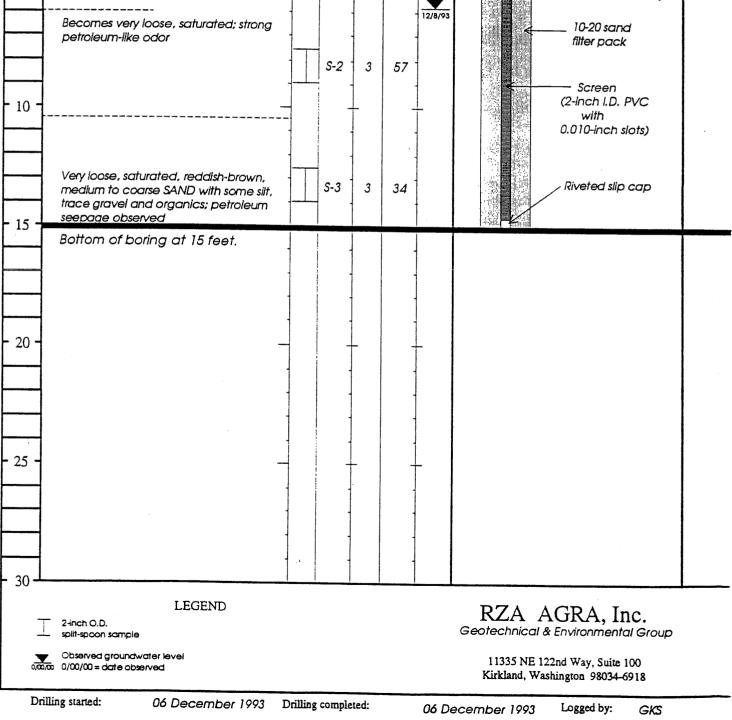
PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-36 Elevation reference: 100.00 feet Well completed: 06 December 1993 Page 1 Ground surface elevation: Unknown AS-BUILT DESIGN Casing elevation: 99,91 feet of 1 SAMPLE TYPE SAMPLE NUMBER BLOW COUNTS OVM READING DIEPTH (feet) GROUND Flush-mounted SOIL DESCRIPTION TESTING steel monument 0 Ground surface op of casing Cement Medium dense, moist, blackish-gray, silty, 12/8/93 Bentonite fine to medium SAND with some gravel S-1 19 0 Casina (Schedule-40 5 2-inch I.D. PVC) Becomes very loose, with increasing silt content 10-20 sand filter pack S-2 2 0 Screen (2-inch I.D. PVC 10 with 0.010-inch siots) Wood debris S-3 Riveted slip cap 4 0 15 Bottom of boring at 15 feet. 20 25 30 **LEGEND** RZA AGRA, Inc. 2-inch O.D.

split-spoon sample

Observed groundwater level ommo 0/00/00 = date observed

Geotechnical & Environmental Group

11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918



Mobil/ADC W.O. 11-04558-09 WELL NO.MW-38 on reference: Unknown Well completed: 05 June 1996 Page 1 AS-BUILT DESIGN and surface elevation: Unknown Casing elevation: Unknown of 1 SAMPLE NUMBER OVM READING DBPTI (feet) SAMPLE TYPE BLOW GROUND 2° above ground SOIL DESCRIPTION TESTING steel monument 0 Top of casing Grass and Roots Loose, moist, dark brown, sitty SAND with Ground surface gravel (strong petroleum hydrocarbon-like odor) WW-38/ 2.5 Bentonite Casing (Schedule-40 5 2-inch I.D. PVC) MW-38 10 0.0 5.0 ATD 10-20 sand filter pack MW-38/ 50/ 0.0 7.5 Screen (2-inch I.D. PVC with Medium dense, saturated, brown WOOD 10 0.02-inch slots) CHIPS with trace silt (Fill) (strong WW-38/ 11 0.0 Threaded end cap petroleum hydrocarbon-like odor) 10.0 Bottom of boring at 12.5 feet. 15 20 25 30 **LEGEND △**AGRA 2-Inch O.D. Observed groundwater level spiit-spoon sampie ATD = at time of drilling Earth & Environmental 11335 NE 122nd Way, Suite 100 Grab sample Kirkland, Washington 98034-6918

HOTATION 20 -	tu
* WW-1	



HOLE NO KRW-						
SHEETL_OF_	1					
TOTAL DEPTH	5.0					
DATE BEGUN 61						
DATE COMPLETED	415/16					

EATHER portly cloudy, 50's

TEST BORING LOG

• · · · • · · · · · · · · · · · · · · ·	
MOBIL/ADC.	
11-04558-09	T 17
inee RAL	
TOR OREN CASCAPE	
HSA	

GROUNDWATER TABLE SAMPLING arb arms of all Novae with a con-DEPT- NIEET 0430 ٠..: 6/5/16 2-18 SAMPLING MOTHOD SOT STANDARD PENETRATION TEST TO TUBE RERING DEM

SOIL DESCRIPTION

GRASS AND ROOTS OVER BACKFILL BENTINITE TO APPROX. 5.6 Feet

1		-	5mm dense, saturated, dark brown silty SAND with GARVER (5m) - wood clebris, free product (oil), strong sil. No symple for removence
γρω-ι), 7 <u>.</u> 5	8 4	II	Pt stiff, moint saluated, brown PEAT - trace silt, strong oder. HNU=14pp
			50 m. dense, saturated, gray brown SAND with sict (50) - trace prat, wood debris from 10-10.5 feet, strong odor. HINU = 40 ppm
\ \ \ \ \ \ \ \ \ \ \ \ \	6 5	I	Stiff, sulvented, brown DEAT-trace silt, strong oder HANG = 5 ppm
			DRILL OUT TO 15' LIGHVING SAND 3 0:5 THREADED CAP.
			3
			140 16 - 30" Drop

BORING LOG **SUMMARY**

	1	3 I	3	A	
.arth	&	Er	V	ironmen	tal

MONITORING WELL AS-BUILT REPORT

			PROJECT No. 11-04558-09
∠ NTION			PROJECT NAME MOBIL / TO
RVED E د	BY STL		BORING/WELL I.D. VRW-1
•	STALLER CASCADE	-	DATE 6/5/4
SOIL TYPE	•		
			1
			-BOVE GROUND REER HEIGHT (IF APPLICABLE)
	+2.0		MONUMENT TYPE IF APPLICABLE)
	(WELL CAP TYPE locking
		ļ	
	•	-,	
			GROUT TIPE/=SACKS
	6 SORFACE		
			BENTONITE SEAL /=SACKS
			BENTONITE SEAL FOR SACIO
		<u> </u>	WELL CASING I.D. 4"
			TYPE OF CASING Schoole 40 PUC
	6		TYPE OF CONNECTION Thread-d
	<u>2</u> .		
	•		FILTER PACK/SIZE/#SACKS_ & X/Z
•	<u></u>	<u>.</u>	
	·		
			WELL SCREEN I.D. 4"
			TYPE OF SCREEN 'V' SCICEN
			SLOT SIZE 0.030
	•		
•			
			DIAMETER OF BOREHOLE 12"
			DIAMETER OF BOREHOLE
-			
	140 145		
	· ·		ENDCAPTYPE threaded (0.5' points)
	14.5	- ·	
REMARKS			

		11.4-
at.	200	
1/2	WW-1	
-	VIC00-1	1
!		į

SAMPLING

MAGRA

Earth & Environmental

bRW-1 SHEET (OF

-דפפת נגדסד 15.0

DATE BEGUT. 6/5/96 DATE COMPLETED

THEE portly cloudy, 50's

TEST BORING LOG

GROUNDWATER TABLE MOBIL/ADC - PROJECT NAME

11-04558-09

ATDEAT TIME OF DRILLING ASEAFTER BORING PROJECT NUMBER

GEOLOGIST, ENGINEER

DRILLING CONTACTOR FOREM CASCAPE

METHOD USED

Sampling method ispt=standard penetration test it=tube r=ring in $\mathbb{D}
otin \mathbb{M}$

SOIL DESCRIPTION

GRASS AND ADOTS OVER BACKFILL BENTONITE TO APPROX. 5.0 Rect

0430

615/46

TIME

TI im m dense, saturated, dark brown silty sand with GANEL (sm) - wood clebris, free product (oil), strong sil. No symple for MENOSPACE

stiff, moist-salurated, brunen PEAT - trace sict, strong oder HNU=14ppm

12 II sp m. dense, saturated, gray brown SAND with sict (SP) - trace prat,
11 I sp m. dense, saturated, gray brown 10-10.5 feet, strong odor.
8 I NNU = 40ppm

Stiff, suturated, brown PEAT - trace sitt, strong odor HNU - 5 ppm

DRILL OUT TO 15' MEAVING SAND 0.5 THREADED CAP.

BORING LOG SUMMARY

	Α	G	R	Д		
Ear	th a	& E	'nv	iro	nme	ental

MONITORING WELL AS-BUILT REPORT

Unitten/INSTALLED		BORING/WELL I.D. VRW-1 DATE 6/5/46
SOIL TYPE DEPTH		
+2.0		ABOVE GROUND RESERVEIGHT (IF APPLICABLE) MONUMENT TYPE - APPLICABLE) WELL CAP TYPE - Locking
6 SOR	FACE	GROUT FFE/=SACKS
.) _i		
2		WELL CASING I.D. 4" TYPE OF CASING Schoole 40 PUC TYPE OF CONNECTION Thread-d
		FILTER PACK/SIZE = SACKS 672
		WELL SCREEN I.D. 4" TYPE OF SCREEN "V" Sercen SLOT SIZE 0.030
		DIAMETER OF BOREHOLE 12"
14.0 14.5 14.6 REMARKS	· · · · · · · · · · · · · · · · · · ·	ENDCAPTYPE + hreaded (0.51 points)

	ng No: AD-01 : 1-15-90	
location of boring: Location: Bulk Terminal-Everett, WA Dril: Hole	Hole Diameter:2" Page No: 1 of 1	
epth Graphic (ft) Log Blow/ft Concentration (ppm) Sample type Soil Group Symbol (U.S.C.S.) 3.0' Water Level Time Date Comments:		
Sample @ 0.5-1.0' sp 0.5-1.0 Sand, coarse grained, occasional g loose, soitst, no odor. 2 -	n, loose, very moist, ght grey brown, very	

			LOG			Project No:	05-487-	001		Boring No: AD-02
-		EXI	PLORATOR	Y BORING		0146-5				Date: 1-15-90
	1000000000	<u> </u>				Client: Ame				Driller: D. Alford
<i>:</i> -	location of	boring:				Location: Bu	lk Term	inal-Ever	ett, WA	- 1
										Hole Diameter: 2"
						Logged by: D				Page No: 1 of 1
						Installation	Data:	Backfill	with env	iroplug
		T	Vapor	Sample type	Soil Group	Water Level	Time	Date	Commen	+
Jepth	Graphic	Blow/ft	Concen-	j.	Symbol		11110	Date	Condien	cs:
(ft)	Log		tration	1	(U.S.C.S.)	approx.			1	
. ,			(ppm)			2.0'				
0 -		:				Grass		l		
-				Sample @	sp	0.5-1.0' Sand	, coars	se grained	with oc	casional gravel, saturated,
1 -	មានចំពោះ			0.5-1.0'				coleum odo		g, 520122501,
-		1					-			
2 -										
-				Sample @	sm	2.5-3.0' Sand	, coars	e grained	with gra	ey/green clayey silt,
3 -				2.5-3.0'						leum odor, irridescent
-	TD = 3.0'						n on wa			
4 -										
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- [l		Groundwater at	appro	ximately 2	21	
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		EXI	LOG (OF Y BORING		Project No: 05-487-001 Boring No: AD-03 Date: 1-15-90
- 74	location of b	oring:				Client: American Distributing Co. Driller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Hand Auger Hole Diameter: 2" Logged by: D. Alford Page No: 1 of 1 Installation Data: Backfill with enviroplug
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	1	Water Level Time Date Comments: Approx. 2.0'
0	TD = 2.0'			Sample @ 0.5-1.0' Sample @ 1.5-2.0'	sc	0.5-1.0 Sand, coarse grained, with clay and occasional pebbles/gravel, light brown, moist, no odor. 1.5-2.0 Sand, coarse, grained, increased clay content with gravel, light grey-brown, wet, no odor. Groundwater at approximately 2.0'

		EXI	LOG (Project No:				Boring No.: AD-04 Date: 1-15-90		
ie.	ocation of h	ooring:				Client: Amer Location: Bui Logged by: D. Installation	lk Term	inal-Evere d	tt, WA	Drilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1		
pth ft)	Graphic Log	Blow/ft	Vapor Concentration (ppm)	and Depth	1	Water Level	Time	Date	Comment	· · · · · · · · · · · · · · · · · · ·		
0 - 1 -	TD = 1.0'			Sample @ 0.5-1.0	ap	0.5-1.0 Sand,		lly, coarse		sand, light brown to grey,		
						Groundwater at	t appro	oximately 9	inches.			
						·						
- ' - -) .											
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	1 2											

			LOG	OF		Project No:	05-487-	001		Boring No: AD-05
7		EXI	PLORATOR			Client: Ame			na Co.	Date: 1-15-90 Driller: D. Alford
i.e	ocation of h	poring:				- 1			-	Drilling Method: Hand Auger
						Logged by: D			rith envi	Hole Diameter: 2" Page No: 1 of 1 roplug
	Graphic Log	Blow/ft	Vapor Concen- tration	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	ts:
10)	Log		(ppm)		(0.5.0.5.)	Approx.				
0	TD = 3.0'			Sample @ 1.5-2.0' Sample @ 1.5-2.0' Sample @ 2.5-3.0	sc .	mois 1.5-2.0' Sand mois 2.5-3.0' Sand	t, some	e gravel, ey, coarse ght petrol ey, coarse e gravel,	slight pe grained, eum odor. grained, slight pe	sand, light grey, loose, etroleum odor. , light grey, loose, etroleum odor.
-										
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			LOG			Project No: 05-4	487-001		Boring No: AD-06
7	location of I		PLORATOR	Y BORING		Client: America Location: Bulk T Logged by: D. Al Installation Dat	Germinal-Evere	tt, WA	Date: 1-15-90 Driller: D. Alford Drilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level Ti	me Date	Commen	
0 -	TD = 1.0'			Sample @ 0.5-1.0	sp	0.5-1.0 Sand, coa	arse grained,	gravelly	y, loose, moist, moderate
3 - - 4 - - 5 -						Groundwater at ap	oproximately 5	.0′	
-)								
-									
-									
-									
- -									

			LOG	OF .		Project No:	05-487-	001		Boring No: AD-07		
			LORATORY	BORING		Client: Ame			ng Có.	Date: 1-15-90 Driller: D. Alford		
1	location of b	oring:				Location: Bu	lk Term	inal-Evers	ett, WA	Drilling Method: Hand Auger Hole Diameter: 2"		
						Logged by: D			ith Envi	Page No: 1 of 1		
epth	Graphic Log	Blow/ft	Vapor Concen- tration	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level Approx.	Time	Date	Commen	its:		
(/	209		(ppm)			6"						
0 -				Sample @ 0.5-1.0"	sp	1				ly, loose, moist to wet,		
2 -	TD = 1.0'					Groundwater a	t annr	vimatoly (- inches	38		
3 - 						oroundwater a	c appro	ermately (Tuches	•		
4 -						·						
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-	location of b		LOG	OF Y BORING		Project No: 05-487-001 Boring No: AD-08 Date: 1-16-90 Client: American Distributing Co. Driller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Han Hole Diameter: 2" Logged by: D. Alford Page No: 1 of 1 Installation Data: Backfill with enviroplug					
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:	
0 -				Sample @ 0.5-1.0'	sm sm	1.5-2.0' s	ight brown and. coars o dark bro	n, dry, no se grained own, loose	o odor. d, gravel e, moist,	gravel, medium grained, lly, some silt/clay, light to no odor.	
3 - 4 - 5 -				Sample @ 2.5-3.0' Sample @ 4.5-5.0'	sc sc	4.5-5.0′ S.	trong petr	oleum odd	or. occasiona	l gravel, light grey, moist l gravel, light grey, moist rated at 5.0'	
	TD = 5.0'					Groundwater	at approx	imately 5	.0'		
-											
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		*	LOG	OF		Project No: 05-487-001	Boring No: AD-09						
		EXI	PLORATOR:	Y BORING		13. 33.	Date: 1-16-90						
	\					Client: American Distributing Co.	Driller: D. Alford						
4	location of b	oring:				Location: Bulk Terminal-Everett, WA	Drilling Method: Hand Auger Hole Diameter: 2"						
						Logged by: D. Alford	Page No: 1 of 1						
						Installation Data: Backfill with Enviroplug							
			Vapor			Water Level Time Date Commer	nts:						
epth (ft)	Graphic Log	Blow/ft	Concen- tration	1	Symbol (U.S.C.S.)								
. ,			(ppm)	-	(0.3.0.5.)	Approx.							
0 -													
-				Sample @	sp	0.5-1 0' Sand coarse emined when							
1 -				0.5-1.0		0.5-1.0' Sand, coarse grained, with moist, no odor.	occasional gravel, loose,						
2 -				Sample @	sp	1.5-2.0 Sand, with gravel, slightly	loose, wet, petroleum odor.						
-	TD = 2.0'			1.5-2.0'									
3 -													
4 -						G							
-						Groundwater at approximately 1.5'							
5 -													
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.e ~		EXI	LOG (Project No:	05-487-	-001		Boring No: AD-10	
	\					Client: Ame	rican D	Distributir	ng Co.	Date: 1-16-90 Driller: D. Alford	
ζ.	ocation of b	oring:								Drilling Method: Hand A	ıger
						Logged by: D	116-			Hole Diameter: 2"	
						Installation			ith Envi	Page No: 1 of 1	
	T	T	1					T			
pth	Graphic	Blow/ft	Vapor Concen-		Soil Group Symbol	Water Level	Time	Date	Commen	ts:	
(t)	Log		tration	1 -	(U.S.C.S.)	Approx.					
			(ppm)			1.25′					
-								l	l		
-				Sample @	sp	0.5-1.0' Sar	d with	gravel, l	oose, wet	t, visible oil stains,	
-		•		0.5-1.0'		шос	erate p	petroleum (odor.		
-	TD = 1.5'										
-											
-						Groundwater a	t appro	eximately 1	25′		
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		PY.	LOG (PLORATOR)			Project No	: 05-487-	-001		Boring No: AD-11		
- \	location of i		PLORATOR	DORING		Client: An Location: I Logged by: Installation	Bulk Term D. Alfor	d	ett, WA	Hole Diamete	Alford hod: Hand Auge	
pth ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:		
	TD = 2.0'			Sample @ 0.5-1.0' Sample @ 1.5-2.0'	ab	1.5-2.0′ Sã	oderate p undy grav oderate o	etroleum el, loose dor.	odor. , wet, vi	t, visible oil	stains,	

		EXI	LOG	OF Y BORING		Project No:	05-487-	-001		Boring No: AD-12 Date: 1-16-90	
	ocation of h					Client: American Distributing Co. Driller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Ham Hole Diameter: 2" Logged by: D. Blaes Page No: 1 of 1 Installation Data: Backfill with Enviroplug					
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:	
0 -				Sample @ 0.5-1.0'	sp	no	petrole	eum odor.		rained, brown, loose, moist,	
3 - - 4 - - 5 -	TD = 3.5'			2.5-3.0' Sample @ 3.0-3.5'		vis: 3.0-3.5' Sand	ible oi	l staining um grained	, strong	ly, grey brown, loose, diesel odor. ly, grey, wet, strong	
-						Groundwater at	approx	cimately 3	.5′		
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			LOG			Project No:	05-487-	-001		Boring No: AD-13
		EX	PLORATOR	Y BORING						Date: 1-16-90
						_ Client: Am				Driller: D. Alford
ield	location of b	oring:		·		Location: B	ulk Term	inal-Evere	ett, WA	Drilling Method: Hand Auger
										Hole Diameter: 2"
						Logged by:				Page No: 1 of 1
						Installatio	n Data: 1	Backfill w	ith Envi	iroplug
	r		т			-				
	1		Vapor	1	1	Water Level	Time	Date	Commen	its:
∍pth	Graphic	Blow/ft	Concen-		1 -		-			
ft)	Log	l	tration	1	(U.s.c.s.)	1				
		ĺ	(ppm)			2.5'				
	1777		l	-		.	.			
0 -					1					
				Sample @	sm	0.5-1.0' Sa	nd, silt	y with oc	casional	gravel, light brown-brown,
1 -			İ	0.5-1.0'		mo	ist, mod	ierate pet:	roleum o	dor.
2 -				Sample @	ab					loose, very moist, visible
. 1			-	2.0-2.5		pe	troleum	staining,	strong	petroleum odor.
3 -	TD = 2.5'		į							
	1					Groundwater	approxim	ately 2.5'	•	
4 -										
						Note: Possi	ole free	product o	n ground	d water. Ground water has
5 -	• [irrid	escent f	ilm and oi	l stream	ning from soil in capillary
-						zone.				
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			LOG			Project No	: 05-487-	-001		Boring No: AD-14		
	location of h		PLORATOR	Y BORING		Client: An Location: I Logged by:	Bulk Term D. Alfor	d	ett, WA	WA Drilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1		
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	e Soil Group Symbol (U.S.C.S.)		Time	Date	Commen	ts:		
0	TD = 2.5'			Sample @ 0.5-1.0' Sample @ 2.0-2.5'	ap ap	2.0-2.5' Sa	nist, mod	derate pet	roleum oo rse grain	ned, brown-dark brown, loos dor. ned, brown-dark brown, loos n odor, visible staining.		
4 - 5						Groundwater						
						,			-			

			LOG C)F	· · · · · · · · · · · · · · · · · · ·	Project No:	05-487-	001		Boring No: AD-15		
i/	Cocation of b		PLORATORY	BORING		Client: Ame						
1	pocation of t	ooring:				Location: Bu Logged by: D Installation	. Blaes			Hole Diameter: 2" Page No: 1 of 1		
∍pth 'ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:		
0 1 2				Sample @ 0.5-1.0'	sp	odo	or.			d, brown, dry, loose, no		
3 -	TD = 3.0'			2.5-3.0'			, very	strong gas	oline o	dor.		
4 - - 5 -						Groundwater a	pproxim	ately 3.0'				
-		-										
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		EXI	LOG (Project No:			<u> </u>	Boring No: AD-16 Date: 1-17-90		
ie	ocation of t	poring:	• • • • • • • • • • • • • • • • • • • •			Client: Ame Location: Bu Logged by: D Installation	lk Term	ninal-Ever	ett, WA	Driller: D. Blaes Drilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1		
epth (ft)	Graphic Log	Blow/ft	Vapor Concentration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:		
0 -	- 1 E/			Sample @ 0.5-1.0'	sp					grey, loose, wet, visible		
2 - - 3 - - 4 -	TD = 1.5'					Groundwater a	t appro	oximately	1.5′			
- 5 - - -												
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		EXI	LOG (Project No:	05-487-	001		Boring No: AD-17 Date: 1-17-90			
	location of 1	poring:			-	Client: Ame Location: Bu Logged by: D Installation	lk Term	inal-Evere	tt, WA	Driller: D. Blaes A Drilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1			
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:			
0 1 2 -	TD = 1.0'			Sample @ 0.5-1.0'	gp			nm grained,		dark grey	loose, wet,		
- 3 - - 4 -						Groundwater a	t appro	ximately l	.0'				
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		EXI	LOG PLORATOR	or Y Boring		Project No:	vo-487-	-001		Boring No: AD-18 Date: 1-17-90
						Client: Ame	rican T)istributir	ar Co	Driller: D. Alford
14	ocation of b	oring:				Location: Bu				
		•							y**	Hole Diameter: 2"
						Logged by: D	. Blaes	;		Page No: 1 of 1
						Installation			ith Envi	
			Vapor	Sample type	Soil Group	Water Level	Time	Date	Commen	ts:
2pth	Graphic	Blow/ft	Concen-	and Depth	Symbol					
ft)	Log		tration		(u.s.c.s.)	Approx.				
			(ppm)			4.5'				
									l	
0 -	0777777777777									
-				Sample @	sc	0.5-1.0' Sand	, clay	ey, brown,	slightly	y cohesive, moist, no odor
1 -				0.5-1.0'	вс					, brown to grey, organic
-										moderate diesel odor at
2 -						2.0-				
-						·				•
3 -										
- [ļ								
4 - 7				Sample @	sc	4.0-4.5' Sand	, medir	ım grained	claveu	grey to black, moderate
- 7	77777777777			4.0-5.0'				liesel odor		31 to Diacu, moderate
5 -	TD = 4.5'						9	.10301 0001	•	
_										
-						Groundwater at	- 20050	vimatalu 4	e,	
- 1	-					oronia acci a	- appro	ximately 4	• 3	
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		EXI	LOG (Project No: (05-487-	-001		Boring No: AD-19 Date: 1-17-90
	ocation of	boring:				Client: Amer Location: Bul Logged by: D. Installation	lk Term	ninal-Evere	Driller: D. Blaes Drilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1	
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:
0	TD = 1.5'			Sample @ 0.5-1.0' Sample @ 1.0-1.5'		mois 1.0-1.5' Sand	t, mode, fine t, soil	erate dies to medium l saturate uct on gro	el odor. grained, d with di undwater	grey to black, loose, tesel fuel oil. surface)
-			-							

TEST PIT LOGS

Depth (feet)	Soil Classification	11-04558-04
	Test Pit TP-1	
0.0 - 0.5	Gravel surface	
0.5 - 1.5	Loose, wet, dark grayish-brown, silty SAND with gravel (Fill)	
1.5 - 3.5	Loose, wet to saturated, gray, coarse SAND with gravel	
	Strong petroleum-like odor and black oily staining observed;	
	Test pit terminated at approximately 3.5 feet	
	Moderate groundwater and liquid petroleum hydrocarbon seepage belo	w 3 feet
	Field FT-IR analysis indicated > 4,600 ppm TPH at 3 foot depth	
	Test Pit TP-2	
0.0 - 0.5	Gravel surface; old A/C at 0.5 feet	
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel	
	No unusual odors or staining observed;	
	Test pit terminated at approximately 4.0 feet	
	Moderate groundwater seepage observed below 3.5 feet	
	A large block of concrete encountered at a depth of approximately 1 for	ot
	Field FT-IR analysis indicated 30 ppm TPH at 3.5 foot depth	
	Test Pit TP-3	
0.0 - 0.5	Gravel surface old A/C at 0.5 feet	
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel	
	Test pit terminated at approximately 4.0 feet	
	Moderate groundwater seepage observed below 3.5 feet	
	Slight surface sheen observed on groundwater emanating from the east s	side of the test
	pit .	

Field FT-IR analysis indicated 80 ppm TPH at 3.5 foot depth

Depth (feet)	Soil Classification
	Test Pit TP-4
0.0 - 0.5	Gravel surface
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel
	Test pit terminated at approximately 4.0 feet
	Moderate groundwater seepage observed below 3.5 feet
	No unusual odors or staining observed
	Field FT-IR analysis indicated 30 ppm TPH at 3.5 feet
	Toot Dit TD F
0.0 - 0.5	Test Pit TP-5 Gravel surface
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel
	Test pit terminated at approximately 4.0 feet
	Moderate groundwater seepage observed below 3.5 feet
	No unusual odors or staining observed
	Field FT IP analysis indicated to man TPU and the
	Field FT-IR analysis indicated 50 ppm TPH at 3.5 feet

Date excavated: 8 December 1993

Logged by: TJP

Backhoe Test Pit Logs

TP-1-96

Gray, moist to wet, silty SAND with gravel and some cobbles. Met with refusal at a depth of approximately 3.0 feet due to buried concrete. Slow seepage observed at approximately 1.5 feet. Soil exhibits a petroleum hydrocarbon-like odor. After approximately 1.5 hours, discontinuous blebs of LPH were observed on the water accumulated in the test pit.

TP-2-96

Brown, moist to wet, silty SAND with gravel and some wood and metal debris; becomes gray below approximately 1.0 feet. Slow seepage observed at approximately 1.0 feet and again below approximately 4.0 feet. Soil exhibits a petroleum hydrocarbon-like odor. After approximately 1.5 hours, discontinuous blebs of LPH were observed on the water accumulated in the test pit. Test pit terminated at approximately 4.5 feet.

TP-3-96

Gray, moist, gravelly SAND with some silt with scattered wood and brick debris. Underlain at approximately 4.0 feet by gray, wet to saturated, cohesive, silty, fine to medium SAND. Slow seepage observed at approximately 1.5 feet. Moderate seepage observed below a depth of approximately 6.0 feet. Soil exhibits a petroleum hydrocarbon-like odor. No LPH observed; sheen present of water accumulated in the test pit. Test pit terminated at approximately 6.5 feet.

Backhoe Test Pit Logs

TP-4-96

Brown, moist to wet, silty SAND with some gravel; becomes gray with a petroleum hydrocarbon-like odor below 2.5 feet. Slow seepage observed below approximately 5.0 feet. Discontinuous blebs of LPH observed on the groundwater accumulated in the bottom of the test pit. Test pit terminated at approximately 6.0 feet.

TP-5-96

Brown, moist to wet, silty SAND with some gravel with some brick and glass debris; becomes gray with a petroleum hydrocarbon-like odor below 2.5 feet. Slow seepage observed below approximately 5.0 feet. Encountered a 4-inch diameter clay pipe at approximately 4.5 feet. LPH and water drained from the pipe for approximately 10 to 15 minutes after digging through the pipe. Discontinuous blebs of LPH observed on the groundwater accumulated in the bottom of the test pit. The LPH appeared to originate from both seepage from the soil and infiltration from the broken clay pipe. Test pit terminated at approximately 6.0 feet.

TP-6-96

Brownish-gray, moist to wet, silty SAND with gravel and wood debris; becomes gray with a petroleum hydrocarbon-like odor below approximately 2.0 feet. Moderate to rapid LPH and groundwater seepage observed below approximately 4.0 feet. Approximately 0.02 feet of LPH accumulated as a continuous layer on top of groundwater pooled inside of the test pit. Test Pit terminated at approximately 6.0 feet.

TP-7-96

Moist to wet, dark brown to black, SAND with some silt and gravel; strong petroleum hydrocarbon-like odor observed. Moderate LPH and groundwater seepage observed below 3.0 feet. LPH accumulated as a continuous layer on top of the groundwater pooled in the test pit. LPH thickness was approximately 0.10 feet. Test pit terminated at approximately 4.0 feet.

Page 1

APPENDIX D

SELECTED GEOTECHNICAL BORING LOGS

LOG OF BORING NO. DM-7-99 PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA WATER LEVEL: ¥7.00 ft CLIENT NAME: Port of Everett DATE STARTED: December 8, 1999 **ELEVATION: 18 ft** DATE COMPLETED: December 8, 1999 TOTAL DEPTH: 45.00 ft DRILLING CONTRACTOR: Cascade Drilling WEATHER: Light rain FIELD ENGINEER: BBS DRILLER: Scott Kruger DRILLING METHOD: Hollow Stem Auger to Mud Rotary CHECKED BY: SAMPLING METHOD: D&M U, 300lb hammer, 30" drop SAMPLE TYPE KEY: MOISTURE CONTENT (%) FINES CONTENT (%) ELEVATION (ft.) BLOWS PER FOOT Relatively undisturbed sample **Bag Sample** DEPTH (ft.) SAMPLE TYPE uscs DENSITY (Disturbed sample Sample attempt with no recovery SPT split spoon sample DÉSCRIPTION REMARKS 18 0 brown woody debris mixed in with brown silty SAND (FILL) SM Dark to reddish brown medium to fine SAND with trace silt and fine gravel (løose to medium dense with depth)(wet) 18 Petroleum Odor Detected in samples 1, 2, 3 (0 - 15 feet below ground surface) PID = 0 6.3 WA 9812 20

NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons

(hard)(low plasticity)

Gray SILT with some medium sand and trace gravel

25

30

ML.



22

18

18

DMSEA6.GDT

LOG OF BORING DM-7-99

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189

FIELD ENGINEER: BBS CHECKED BY:

Sheet 2 of 2

PROJECT LOCATION: Everett, WA SAMPLE TYPE KEY: DRY
DENSITY (pcf)
MOISTURE
CONTENT (%)
BLOWS PER
FOOT FINES CONTENT (%) Relatively undisturbed sample Bag sample ELEVATION(ft.) DEPTH (ft.) GRAPHIC SYMBOL SAMPLE SSS Disturbed sample Sample attempt with no recovery SPT split spoon sample **DESCRIPTION** REMARKS 30 18 25.8 81 Brown medium SAND with some silt and trace of fine gravel SM (very dense)(wet) 35 107.2 15 50/6" 12 -22 40 109.8 11.4 68 18 45 100/10" 10 End of Boring at 46 feet below ground surface Ground water encountered at 7 feet below ground surface

NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons



LOG OF BORING DM-7-99

LOG OF BORING NO. DM-8-99

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett

DATE STARTED: December 1, 1999
DATE COMPLETED: December 1, 1999

DRILLING CONTRACTOR: Cascade Drilling
DRILLER: Scott Kruger

DRILLING METHOD: Hollow Stem Auger to Mud Rotary

WATER LEVEL: ¥5.00 ft

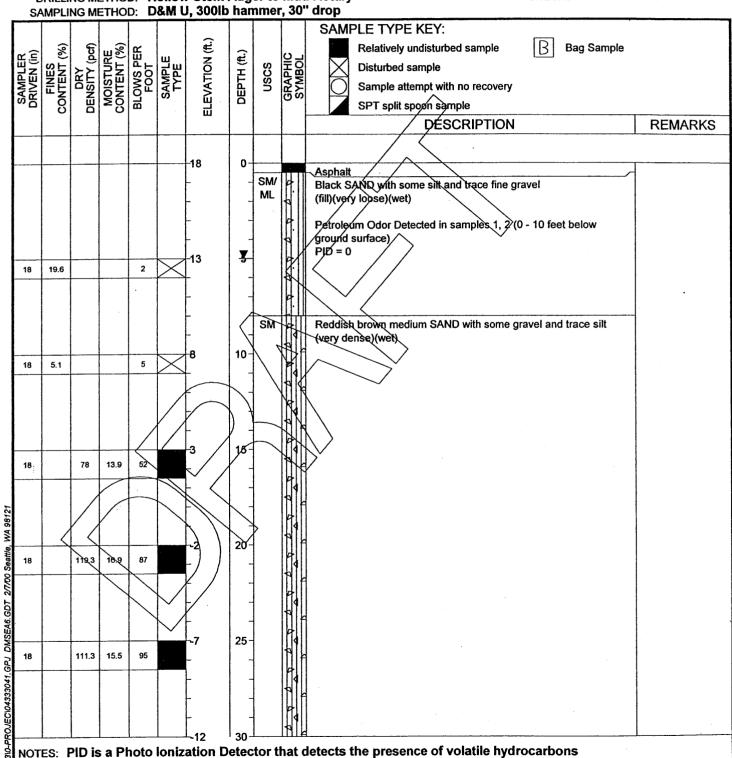
ELEVATION: 18 ft

TOTAL DEPTH: 50.00 ft

WEATHER: Overcast, light rain

FIELD ENGINEER: BBS

CHECKED BY:



DAMES & MOORE

A DAMES & MOORE GROUP COMPANY

LOG OF BORING DM-8-99

FIGURE A-10.1

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189

FIELD ENGINEER: BBS CHECKED BY:

Sheet 2 of 2

PROJECT LOCATION: Everett, WA SAMPLE TYPE KEY: FINES CONTENT (%) DRY DENSITY (pcf) MOISTURE CONTENT (%) BLOWS PER FOOT Bag sample Relatively undisturbed sample ELEVATION(ft.) DEPTH (ft.) SAMPLE USCS Disturbed sample Sample attempt with no recovery SPT split spoon sample **DESCRIPTION REMARKS** 30-12 50/3" 113.1 14.3 35 50/6" >< Gray SILT with trace fine to medium sand and fine gravel ML (very stiff) 40 -27 45 36 90.2 Gray fine to medium SAND with some silt SM' (very dense)(wet) 50/-50/6" 18 End of Boring at 51.5 feet below ground surface Ground water encountered at 5 feet below ground surface NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons

DAMES & MOORE

A DAMES & MOORE GROUP COMPANY

LOG OF BORING DM-8-99

MONITORING WELL NO. DM-6-99

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett. WA WATER LEVEL: ¥0.00 ft CLIENT NAME: Port of Everett ELEVATION: +20.00 DATE STARTED: December 6, 1999 TOTAL DEPTH: 55.00 ft DATE COMPLETED: December 6, 1999 WEATHER Overcast, light rain DRILLING CONTRACTOR: Cascade Drilling FIELD ENGINEER: BBS DRILLER: Scott Kruger DRILLING METHOD: Hollow Stem Auger to Mud Rotary CHECKED BY: SAMPLING METHOD: D&M U, 300lb hammer, 30" drop SAMPLE TYPE KEY: MOISTURE CONTENT (%) BLOWS PER FOOT Relatively undisturbed sample Bag Sample DEPTH (ft.) FINES CONTENT (ELEVATION uscs DRY DENSITY (Disturbed sample Sample attempt with no recovery SPT split spoon sample WELL CONSTRUCTION DETAIL & REMARKS DÉSCRIPTION ELEVATION V+ -20.0 SM/ Blackish Brown fine sandy SIL Twith trace gravel (possible fill)(soft)(moist) ML Gray brown predium to fine SAND with trace to some silt and fine SM -15.0 5-15 99.8 25.3 (medium dense)(wet) Retroleum Ødor Detected in samples 1, 2 (0 - 10 feet below ground surface) PID = 0. 10.0 10 18 103.1 16.5 14 18 3.1 128.6 136 Q.O 18 25 18 14.3 90.8 14.3 ML Dark gray SILT with some fine sand (very stiff)(low plasticity) 10.0 NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons **MONITORING WELL DM-6-99** Bentonite grout DAMES & MOORE SYMI

Bentonite plug

Filter Pack

A DAMES & MOORE GROUP COMPANY

Well screen

Concrete plug

FIGURE A-8.1

FIELD ENGINEER: BBS

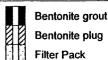
Sheet 2 of 2

PROJECT LOCATION: Everett, WA CHECKED BY: **SAMPLE TYPE KEY:** FINES CONTENT (%) DRY DENSITY (pcf) MOISTURE CONTENT (%) BLOWS PER FOOT SAMPLE TYPE ELEVATION(ft.) Relatively undisturbed sample Bag sample DEPTH (ft.) uscs Disturbed sample Sample attempt with no recovery SPT split spoon sample WELL CONSTRUCTION DETAIL & REMARKS **DESCRIPTION** ELEVATION -10.0 30 18 103,6 18.9 26 SM Brown medium SAND with some silt and trace gravel (very dense)(wet) 15.0 20.2 \$8 for 11 93.1 SP Gray brown medium SANQ with trace silt and fine gravel (very dense)(wet) -20.0 40 8 for 11 18 -25.00 -25.0 45 20.1 96 for 1 18 109.4 50 30.0 12 50 for 5 35.0` 55 12 50 for 5 K:\163\0-PROJEC\04333041.GPJ DMSEA6.GDT 27\00 Seattle, WA 9812 End of boring at 56 feet below ground surface Ground water encountered 6 feet below ground surface

AMES & MOORE A DAMES & MOORE GROUP COMPANY

WELL SYMBOL KEY:

NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons



MONITORING WELL DM-6-99 Well screen

Concrete plug

FIGURE A-8.2

APPENDIX B BORING LOGS

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA
CLIENT NAME: Port of Everett
DATE STARTED: September 25, 2000

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft

DATE COMPLETED: September 25, 2000
DRILLING CONTRACTOR: Cascade Drilling
DRILLER:

TOTAL DEPTH: 12.00 ft WEATHER:

DRILLING METHOD: Geoprobe

FIELD ENGINEER: T. Parkington CHECKED BY: M. McCabe

SA	AMPLI	NG M	ETHO	D: G	eopr	obe					
SAMPLER DRIVEN (in)	FINES CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE	ELEVATION (ft.)	ОЕРТН (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
					X	-18 - - - -13 -	0- - - - 5- -	GP PT SM		Asphaltic Concrete. Gravel subgrade Dark brown silty peat Black silty sand with some woody peat Brown sand with some silt. h.c. odor	PID = 3 ppm PID = 24 ppm PID = 2 ppm
					X	-8 -	- 10 - - -			Brown gray sand, wet. Boring completed at 12 feet. Backfilled with Bentonite. Ground water at 4 feet bgs.	PID = 0 ppm No odor
ECTNODE: Grad Oncoler (GLD Oncoler) (GD) (Franco Gradine), NA 90121					·						

NOTES:



LOG OF BORING UG-1

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000 DATE COMPLETED: September 25, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥3.00 ft

ELEVATION: 16 ft

TOTAL DEPTH: 17.00 ft

WEATHER:

FIELD ENGINEER: T. Parkington CHECKED BY: M. McCabe

S	AMPLI	NG M	ETHO	D: G	eopr	obe				51.251.25 B1.	
SAMPLER DRIVEN (in)	FINES CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEPTH (ft.)	USCS	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
						-16 -	0-	OL	10 for the state of the state o	Asphaltic Concrete Black organic silt	
					X	-11 	5-	SM PT	400	Black silty sand. Strong odor. Black woody peat	PID = 200 ppm Very oily. PID =
						- 6 -	- 10-				200 ppm GW sample taken PID = 300 ppm PID = 12 ppm
						- - -1	15-	SM	400	Brown silty sand.	PID = 0 ppm
:			-						FJ.	Boring completed at 17 feet. Backfilled with bentonite. Ground water at 3 feet	
										·	
NOTI											
NOT	ES:										

LOG OF BORING UG-2

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA WATER LEVEL: ¥5.00 ft CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000 ELEVATION: 18 ft DATE COMPLETED: September 25, 2000 TOTAL DEPTH: 14.50 ft DRILLING CONTRACTOR: Cascade Drilling WEATHER: FIELD ENGINEER: T. Parkington DRILLER: DRILLING METHOD: Geoprobe CHECKED BY: M. McCabe SAMPLING METHOD: Geoprobe SAMPLE TYPE KEY: MOISTURE CONTENT (%) DRY DENSITY (pcf) BLOWS PER FOOT ELEVATION (ft.) Relatively undisturbed sample Bag Sample SAMPLER DRIVEN (in) SAMPLE TYPE DEPTH (ft.) FINES CONTENT (uscs Disturbed sample Pocket Penetrometer Sample attempt with no recovery Vane Shear (psf) SPT split spoon sample **DESCRIPTION** REMARKS -18 Asphaltic Concrete. GP Gravel subgrade SM Gray brown silty sand PID = 0 ppm Red-tan silty sand PID = 0 ppmSM/ Brown silty sand / sandy silt with lenses of woody peat. PID = 1 ppm ML. 10 No evidence of hydrocarbons in water on rods Boring completed at 14.5 feet. Backfilled with bentonite. Groundwater at 5 feet bgs. NOTES: LOG OF BORING UG-3 FIGURE G 3

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000

ELEVATION: 20 ft TOTAL DEPTH: 14.50 ft

WATER LEVEL: ¥4.00 ft

DATE COMPLETED: September 25, 2000 DRILLING CONTRACTOR: Cascade Drilling

WEATHER:

FIELD ENGINEER: T. Parkington

DRILLER: DRILLING METHOD: Geoprobe CHECKED BY: M. McCabe SAMPLING METHOD: Geoprobe

SAMPLER DRIVEN (in)	FINES CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEPTH (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
						-20	0-	GP	.0	Gravel	
					X	- -	 	SM	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	Brown sand with some silt and gravel. No odor	PID = 0 ppm
					X	-15 - -	5- - -	ML SM	ø	Gray silt Brown sand with some silt	PID = 0 ppm
					X	- -10 - - -	- 10- - -	JIVI	20 20 20 20 20 00 00 00 00 00 00 00 00 0	BIOWIT SAIRG WILLT SOTTIE SITE	PID = 0 ppm
:										Boring completed at 14.5 feet. Backfilled with bentonite. Groundwater at 4 feet.	
						,					

NOTES:

LOG OF BORING UG-4

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000 DATE COMPLETED: September 25, 2000 DRILLING CONTRACTOR: Cascade Drilling DRILLER: DRILLING METHOD: Geoprobe

WATER LEVEL: ¥6.00 ft

ELEVATION: 19 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

				D: G	eopi					CHECKED BY: M.	
SAMPLER DRIVEN (in)	CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEPTH (ft.)	SOSU	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
						19	0-	GP	. o .	Gravel	I
					X	-14	5-	SM	9 2 2 4 2 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	Brown silty sand with trace gravel. No odor.	PID = 0 ppm
						_	- <u>-</u>	SM		Gray silty sand Dark brown silty sand with trace gravel and wood fragments.	- PID = 0 ppm
				-	X	- 9 -	10- -	Sivi	2 2 4 2 4 5 4 5 5 5 5 5 5 5 5 5 5 5 5 5	Dark brown sitty sand with trace graver and wood tragments.	PID = 0 ppm
									11,14	End of boring at 12 feet. Backfilled with bentonite. Ground water at 6 feet bgs.	

NOTES	3 :										

LOG OF BORING UG-5

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett
DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000
DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe SAMPLING METHOD: Geoprobe

WATER LEVEL: ¥5.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

LOG OF BORING UG-6

SAMPL	NG M	THO	D: G	eopr	obe	,				
SAMPLEK DRIVEN (in) FINES CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEPTH (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
					-18 -	0-	SM/ GM	2,00	Brown silty gravel and sand .	
				X	- -13 -	- - 3	SM	5 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Gray silty sand, some gravel. No odor. Traces of brown color	PID = 0 ppm PID = 0 ppm
				X	8	- - 10-	SP		Some wood fragments. Brown sand, silt and gravel.	PID = 0 ppm
				X		-			End of boring at 12 feet. Backfilled with bentonite. Ground water at 5 feet bgs.	
							·		· · · · · · · · · · · · · · · · · · ·	
NOTES:]					

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett. WA CLIENT NAME: Port of Everett DATE STARTED: September 26, 2000 DATE COMPLETED: September 26, 2000 DRILLING CONTRACTOR: Cascade Drilling DRILLER: DRILLING METHOD: Geoprobe SAMPLING METHOD: Geoprobe DRY DENSITY (pcf) FINES CONTENT (%) MOISTURE CONTENT (%) ELEVATION (ft.) BLOWS PER FOOT DEPTH (ft.) SAMPLE TYPE USCS 16 0 SM

WATER LEVEL: ¥2.00 ft

ELEVATION: 16 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

SAMPLE TYPE KEY: Relatively undisturbed sample Bag Sample Pocket Penetrometer Disturbed sample Vane Shear (psf) Sample attempt with no recovery SPT split spoon sample **DESCRIPTION** REMARKS Asphaltic Concrete. PID = 0 ppmDark brown to gray silty sand with some gravel PID = 0 ppmSome wood fragments PID = 0 ppmDark brown sand with some silt and gravel. PID = 0 ppmEnd of boring at 12 feet. Backfilled with bentonite. Groundwater at 2 feet bgs. DB3 KN163104333-11GEOPROBE.GPJ URSSEA1.GLB URSSEA1.GDT 11/3/00 Seattle, WA 98121

NOTES:

LOG OF BORING UG-7

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥4.00 ft

ELEVATION: 17 ft

TOTAL DEPTH: 19.50 ft WEATHER:

FIELD ENGINEER: B. Strickler CHECKED BY: M. McCabe

SAMPLING METHOD: Geoprobe SAMPLE TYPE KEY: MOISTURE CONTENT (%) FINES CONTENT (%) ELEVATION (ft.) DENSITY (pcf) BLOWS PER FOOT Relatively undisturbed sample Bag Sample SAMPLER DRIVEN (in) DEPTH (ft.) SAMPLE TYPE uscs Disturbed sample Pocket Penetrometer Vane Shear (psf) Sample attempt with no recovery SPT split spoon sample DESCRIPTION REMARKS GP Gravel SM Gray silty sand with some gravel PID = 186 ppm SM Dark brown to black silty sand with some gravel and wood fragmenst. Strong odor. 5 PID = 180 ppm Strong odor SM Gray silty sand with some gravel Black silty sand with some wood fragments. Strong odor PID = 105 ppmBlack woody peat, strong odor. 10 PID = 5 ppmColor grades to red with no odor. 364.4 PID = 0 ppmBrown sand with some silt and gravel. Faint odor 15-PID = 0 ppmNo odor. End of boring at 19.5 feet. Backfilled with bentonite. Gound water at 4 feet bgs.

URSSEA1.GLB

NOTES:

LOG OF BORING UG-8

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA
CLIENT NAME: Port of Everett

DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000 DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 17.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

SAMPLING ME						GREGRED B1. III.	ouse
SAMPLER DRIVEN (in) FINES CONTENT (%) DRY DENSITY (pcf)	MOISTURE CONTENT (%) BLOWS PER FOOT	SAMPLE TYPE TYPE ELEVATION (ft.)	DEPTH (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
		18	0- - - <u>▼</u> 5-	GP SM	1	Gravel Gray silty sand with some gravel. Strong odor.	PID = 430 ppm
		8	10-	PT	7 4	Strong odor. Woody peat. Strong odor. Strong odor.	PID = 175 ppm PID = 200 ppm PID = 375 ppm
	827.4	3	15-	SP		Brown sand with trace silt and some gravel. Some odor. No odor	PID = 0 ppm
						End of boring at 17 feet. Backfill with bentonite. Groundwater at 4 feet bgs.	
OTES:							

NOTES:

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LOG OF BORING UG-9

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett
DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥3.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

LOG OF BORING UG-10

SAMPLING METHO	CHECKED B1. WI.			
SAMPLER DRIVEN (in) FINES CONTENT (%) DRY DENSITY (pcf) MOISTURE CONTENT (%)	BLOWS PER FOOT SAMPLE TYPE ELEVATION (ft.)	DEPTH (ft.) USCS GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION Bag Sample Pocket Penetr Vane Shear (p	
	18	O GP O	Gravel	T
	13	SP	Brown to dark brown sand with some to trace silt and gravel. No odor.	PID = 0 ppm
	8	10-		PID = 0 ppm
			End of boring at 12 feet. Backfilled with Bentonite. Groundwater at 3 feet bgs.	
NOTES:	· · · · · · · · · · · · · · · · · · ·	<u> </u>		

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189

PROJECT LOCATION: Everett, WA
CLIENT NAME: Port of Everett

DATE STARTED: September 26, 2000
DATE COMPLETED: September 26, 2000
DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

SAMPLER DRIVEN (in)	FINES CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEРТН (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample	
	_									DESCRIPTION	REMARKS
						18	0-	GP	.0.	Gravel.	
						-		SP). D	Brown to gray sand with some to trace silt and gravel. Faint odor.	
								or.		DIOWIT to gray Saild with Some to trace six and graver. I amit odos.	PID ≈ 0 ppm
					X	_	<u>*</u>				
						-13	5-			No odor	PID = 0 ppm
					X	_	-			NO Odol	ID = 0 ppiii
						_	-				DID . O
					X	-	-				PID = 0 ppm
						-8	10-				
					\bigvee	-	'-			•	PID = 0 ppm
			_		\angle	_	-			End of boring at 12 feet. Backfilled with bentonite. Groundwater	
										at 4 feet bgs.	
										·	
1											
										•	
							-				
						1		1	1		

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LOG OF BORING UG-11

PROJECT: California Street Overcrossing

PROJECT NO: **04333-041-189**PROJECT LOCATION: **Everett, WA**

CLIENT NAME: Port of Everett
DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000
DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

SAMPLING METHOD: Geoprobe	
	mple Penetrometer near (psf) REMARKS
SP Brown sand with trace silt and gravel. No odor.	PID = 0 ppm
Some wood fragments.	PID = 0 ppm PID = 0 ppm
8 10 Woody peat	PID = 0 ppm
SP Sown sand with trace silt and gravel. End of boring at 12 feet. Groundwater at 4 feet bgs. Backfille with bentonite.	ed
OTES:	

URS

LOG OF BORING UG-12

SOIL BORING AND WELL INSTALLATION DATA SHEET Boring ID: JP-1/JP-1a

Project Information Page 1 of 1

Project Name:	California Street Overcro	ossing		Location: California	St and Federal Ave
Project/Task No.:	53-04333041.00 00056			Weather: sunny, 60F	F
Drilling Information					
Date Started:	Thursday, June 21, 2001			Annulus Diameter:	2 inches
Date Completed:	Thursday, June 21, 2001			Hammer Weight and Drop.	p: NA lbs and NA inches
Drilled By:	Kasey Goble	of	Cascade Drilling	Sampler Type:	3' stainless steel split spoon
Logged By:	Kate Pineo	of	URS	Approximate Surface Elevi	vation: NA feet
Checked By:	Dave Raubvogel	of	URS	Groundwater Level:	4 below ground surface
Drilling Method:	Direct Push			Total Depth:	13 below ground surface
Drill Rig Type:	Truck-mounted GeoProb	e		Backfill Material:	bentonite chips, asphalt patch
Well Installation Data					
Type of Well Casing:	NA			Top of PVC Elevation:	NA
Screen Perforation:	NA			Type/Thickenss of Seals:	NA
Diameter of Well:	NA			Type of Sand Pack:	NA
Screened Interval:	NA				

	Depth (feet)	Blows per 6 inches	Penetration/ Recovery (inches)	Time	USCS Classification	USCS Graphic	Material Description	Well Completion Diagram	PID Readings (ppm)	Samples	Remarks
	0						Asphalt, gravel road base.				
	2 3		36/24				Gray to brown Silt and fine Sand, some very angular fine Gravel, dry. Gray medium to coarse sand, mottled, moist.		16.1	JP1/1.5-4.5	Began sampling at 1.5'.
	4		36/27	8:15	ML SM		Gray Silt and Clay, wood debris, moist. Grading brown. Brown fine Sand and Silt, wet.		45	JP1/4.5-7.5	
1	5				ML		Brown Silt and Clay, wet.				
	7		36/36	8:30	SM		Brown Sand and Silt with silty clay interbeds, grading black.		15	Љ1/Л.5-10	
	9		36/12	8:45	SP		Brown medium to coarse Sand, medium soft, mottled, wet.		5		Refusal at 10' bgs. Moved 6.5' west and sampled 10 - 13'.
1	11 12										west and sampled 10 - 13.
	13						BORING COMPLETED AT 13'				,
	15										
	16										
	18 19										
L	20										

~	TI	
w	11	-3.

Groundwater level measured down-hole with water level indicator.

PID screening on black soil at 10' bgs = 14 ppm.

Sampled groundwater JP1/GW at 8:30. Slow recharge, very clear water.

Slight organic odor in 10 - 13' sample. Not collected for analysis.

SOIL BORING AND WELL INSTALLATION DATA SHEET Boring ID: JP-2 Project Information Page 1 of 1 roject Name: California Street Overcrossing Location: California St and Federal Ave Project/Task No.: 53-04333041.00 00056 Weather: sunny, 60F **Drilling Information** Date Started: Thursday, June 21, 2001 Annulus Diameter: 2 inches Date Completed: Thursday, June 21, 2001 Hammer Weight and Drop: NA lbs and NA inches Drilled By: of Kasey Goble Cascade Drilling Sampler Type: 3' stainless steel split spoon Logged By: Kate Pineo URS Approximate Surface Elevation: NA fect Checked By: Dave Raubvogel URS Groundwater Level: 2.3 below ground surface Orilling Method: Direct Push Total Depth: 6 below ground surface Drill Rig Type: Truck-mounted GeoProbe Backfill Material: bentonite chips Well Installation Data Type of Well Casing: NA Top of PVC Elevation: NA creen Perforation: NA Type/Thickenss of Seals: NA Diameter of Well: NA Type of Sand Pack: NA Screened Interval: NA PID Readings (ppm) Blows per 6 inches Penetration/ Recovery (inches) Well Completion Diagram Samples Remarks 9:15 Brown Silt and Clay, some fine Gravel, dry. JP2/0-3 Fine Sand and Silt, some fine Gravel, wet. 0 JP2/3-6 36/24 9:15 Grading brown fine to coarse Sand and fine Gravel, some Silt. Grading brown-gray fine Sand and Silt, some fine to coarse Gravel. Black fine Sand, saturated. BORING COMPLETED AT 6'

NOTES:

Groundwater level measured down-hole with water level indicator.

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SOIL BORING AND WELL INSTALLATION DATA SHEET Roring ID: ID 2

Proj	ect Inform	mation										Page 1 of 1		
Proje	ect Name:		Califor	nia Stree	t Overcro	ssing	Location:	California	St and Fed	eral Ave	· · · · · · · · · · · · · · · · · · ·	- 4,60 1 00 1		
Proje	ect/Task N	lo.:	53-043	33041.00	00056		Weather:	sunny, 60		· - · · · ·				
_	ing Infor	mation												
l	Started: Complete	d.		ay, June : ay, June :			Annulus Dian			2 inches NA lbs and NA inches				
	ed By:	u.	Kasey (21, 2001	of Cascade Drilling	Hammer Weig Sampler Type	NA inches						
	ed By:		Kate Pi			of URS	Approximate:		vation-) staintess NA	steel split spoo	on		
	ked By:			aubvogel		of URS	Groundwater i		ration.	2.5	below ground	surface		
Drilli	ing Metho	d:	Direct I	Push			Total Depth:			6	below ground			
Drill	Rig Type:		Truck-r	nounted	GeoProbe		Backfill Mater	rial:		bentonite o	•			
Well	Installati	on Data												
	of Well C		NA				Top of PVC E	launtian		N/ A				
	n Perforat	-	NA NA				Type/Thickens			NA NA				
Diam	eter of W	ell:	NA				Type of Sand I			NA				
Scree	ned Interv	al:	NA	<u> </u>										
				5	1				1	· ·	1			
Depth (feet)	ber 6	Penetration/ Recovery (inches)		USCS Classification					Well Completion Diagram	PID Readings (ppm)				
cpth	Blows per inches	enetr ecov nche	i iii	SCS	USCS Graphic				omple	JE C				
9	Ø .5	36/30	10:00	GP		Material Description Brown fine to medium Sand and fine Gravel, dry.			≥00	8.5	Samples JP3/0-3	Remarks		
				ML		Brown-gray Silt and Clay, some fine Gravel, damp.					51.51.0.5			
						brown-gray 3m and Clay, some fine Graver, damp.								
1														
2														
3		36/36	10:00	SM		Brown fine Sand and Silt, wet.				6	JP3/3-6			
												,		
4														
١						·								
5														
1		· I										·		
1	į													
6						BORING COMPLETED AT	6'.							
7														
ı	1													
ı	l													
8	-													
- 1	1							•						
9			1		I									
			I		1	•								
\perp						· · · · · · · · · · · · · · · · · · ·								
OTE	S:													
		el measured d	own-hole	with wa	ter level i	ndicator.						<u> </u>		
												1		
												1		
												1		

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SOIL BORING AND WELL INSTALLATION DATA SHEET
Boring ID: JP-4

Pro	ject Infor	mation											Page 1 of
Proj	ect Name:	:	Califor	nia Stree	t Overcro	ossing	Location: California St and Federal Ave						
Proj	ect/Task l	No.:	53-043	33041.00	0 00056		Weather: sunny, 60F						
P. **													
	ling Infor	mation	Th		31, 2001								
ł	: Starteu: : Complete	ed:		ay, June			Annulus Diar			2	inches		
1	led By:		Kasey		21, 2001	of Cascade Drilling	Hammer Wei Sampler Type		р:	NA 3' stainless	_lbs and steel split spo	NA NA	inches
Log	ged By:		Kate Pi			of URS	Approximate		vation:	NA NA	feet	Oil	
Chec	ked By:		Dave R	aubvogel	1	of URS	Groundwater			2	below ground	i surface	
,	ing Metho		Direct 1	Push			Total Depth:			10	below ground	i surface	
Drill	Rig Type	:	Truck-i	nounted	GeoProb	e	Backfill Mate	rial:		bentonite o	hips		
Well	Installati	ion Data											
Турс	of Well C	asing:	NA				Top of PVC E	Elevation:		NA			·
Scree	en Perfora	tion:	NA				Type/Thicken	iss of Seals:		NA			
1	neter of W		NA				Type of Sand	Pack:		NA	 -		
Scree	ened Inter	val:	NA										
۵	9	<u>ş</u>		u O					_	88			
ĵ.	S per	tratio very		ficat	. 9				letio	eadin			
Depth (feet)	Blows per inches	Penetration/ Recovery (inches)	Time	USCS Classification	USCS Graphic	Material Description			Well Completion Diagram	PID Readings (ppm)	Samples		
0		36/24	10:30	GP		Brown-gray fine Sand and Gravel, dry			7 3 7	280 - 300	JP4/0-3	Odor.	Remarks
				SM	111111	Gray fine Sand and Silt, some fine Gravel, dark gray	ash/sinder laye	r, dry.					
1							•	•					
, i		İ										ļ	
			1										
2													
						Grading brown fine Sand and Silt, little coarse Grave	iL.						
3		36/12	10:45	SP									
١		50/12	10.45	J.		Brown fine to coarse SAND, little coarse Gravel, wet	•			270	JP4/3-6	Odor.	
4													
5										1		1	
									,	1			
6						No sample collected.							
												1.	
7	İ			.						l			
	1	ĺ								-			
										l			
8	I	24/7	10:50	SM		Gray medium Sand and Silt, wet. Red-brown wood d	ebris noted.			5.3	JP4/8-10		
- 1													
9	İ			l				- 1		1			
		1		İ				-		1			
						BORING COMPLETED AT	0.						
NOTE	S:												
		el measured d				indicator.							
roun	iwaier san	nple JP4/GW	collected	at 10:50.									

URS

SOIL BORING AND WELL INSTALLATION DATA SHEET

	/==										F	Boring ID:	JP-5
Proje	ect Inform	nation											Page 1 of
Ргоје	ect Name:		Califor	nia Street	(Overere	ossing	Location:	California	a St and Fede	eral Ave			
Proje	ect/Task No	lo.:	53-043	33041.00	00056		Weather	sunny, 60F	F				
$\overline{}$	ing Inform	nation								2			
1	Started:	. J.		ay, June 2			Annulus Diar			inches	N/A :=='		
	Completed ed By:	3 :		ay, June 2 Goble	11, 2001	of Cascade Drilling	Hammer Wei Sampler Type	ight and Drop);	NA 3' stainless	_lbs and steel split spoon	NA inch	ies.
	ed By:		Kasey C Kate Pir			of URS	• • • • • • • • • • • • • • • • • • • •	e: e Surface Elev	vation-		feet split spoon	<u> </u>	
	ked By:			laubvogel	1	of URS	Groundwater		ation.	2	below ground s	surface	
	ing Method	ıd:	Direct P				Total Depth:			6	below ground s		
	Rig Type:			mounted C	GeoProb	36	Backfill Mate			bentonite c	-		
-117.11	- 1-11-4												
	of Well Ca		NA				Top of PVC F	Flevation:		NA			
	n Perforati		NA NA				Type/Thicken			NA NA			 .
	eter of We		NA				Type of Sand			NA			
	ned Interv		NA										
_													
ê	1 20	Penetration/ Recovery (inches)		USCS Classification					Well Completion Diagram	PID Readings (ppm)	!		
Depth (fect)	Blows per 6 inches	netral Cover	g	USCS Classific	USCS Graphic			1	mple agran	PID Rea (ppm)			
Det 0	Blo	2.50.E			135			······································	≱೮ದ		Samples	Remark	ks
١	, 1	36/36	11:05	SM		Light gray fine Sand and Silt, some coarse Gravel,	iry.	,	1	4.3	JP5/0-3		
	, 1	1	'	1 '				ļ	1 '	'	'		
1	1 1	•	. '	ML		Dark gray SILT and coarse Gravel			1 '	1			
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OTE:		vel measured	down-ho	le with w	ater leve	el indicator.	<u> </u>						
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URS

SOIL BORING AND WELL INSTALLATION DATA SHEET

Proj	ect Infor	mation				•						Page 1 of
	ect Name:			nia Street		ssing		Location: Califor	mia St and Fed	eral Ave		
Proj	cvTask N	ło.:	53-043	33041.00	00056			Weather: sunny,	. 60F			
	ing Infor	mation										
ı	Started: Complete	:d:		ay, June 2 ay, June 2				Annulus Diameter: Hammer Weight and I		2	inches	NIA tod
•	ed By:		Kasey (, 2001	of Cas	cade Drilling	Sampler Type:	лор.	NA 3' stainless	_lbs and s steel split spoo	NA inches
	ed By:		Kate Pi			of URS	3	Approximate Surface I	Elevation:		feet	
	ked By: ng Metho	d.		aubvogel		of URS	3	Groundwater Level:		2	_below ground	
	Rig Type:		Direct F	nounted (GeoProbe			Total Depth: Backfill Material:		9 bentonite	_below ground	surface
Well	Installati	on Dota								- CONTROLLE		
	of Well C		NA			 		Top of PVC Elevation:		NA		
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	eter of Wo		NA				-	Type of Sand Pack:		NA		
- CICC	ned mer	rai.	NA									
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0		36/24	11:50	SM		Gray-brown fine San	d and Silt, some coarse Gra	vel, mottled, dry.	707	4.3	JP5/0-3	Remarks
1 2 3 4		36/6	11:50			Grading wet.				14		Poor recovery.
7				·		Grading peat noted.				1.5	JP5/6-9	
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OTE:		al magnirad d	lava bala	and the same	1	. J						
. vuno	waici icvi	el measured d	wa-110(6	, with Wa	icr i evel i	nulcator.	·					

SOIL BORING AND WELL INSTALLATION DATA SHEET Boring ID: _____ JP-7

Project Information				Page 1 of
Project Name:	California Street Overcrossing	Location:	California St and Federal Ave	
Project/Task No.:	53-04333041.00 00056	Weather	sunny, 60F	

	ct Name:					Location: California St and Federal Ave										
Proje	ct/Task N	lo.:	53-043	33041.00	00056					Weather: sunny, 60F						
Drilli	ing Infort	mation									<u>.</u>			<u> </u>		
Date	Started:		Thursd	ay, June	21, 2001					Annulus Dias	meter:		2	inches		
Date	Complete	d:	Thursd	ay, June :	21, 2001					Hammer Wei	ight and Drop) :	NA.	lbs and	NA	inches
Drille	d By:		Kasey (Goble		of of	Cascade	c Drilling		Sampler Type	e:		3' stainless	steel split spoo	on	
Logge	ed By:		Kate Pi	neo		of	URS			Approximate	Surface Elev	ation:	NA	fcct		
Checi	ked By:		Dave R	aubvogel	<u> </u>	of	URS			Groundwater	Level:		2	below ground	surface	
Drilli	ng Metho	d:	Direct I	Push						Total Depth:			9	below ground	surface	
Drill I	Rig Type:		Truck-r	nounted	GeoProb	oe .				Backfill Mate	rial:		bentonite o	hips		
Well	Installati	on Data														
Туре	of Well C	asing:	NA							Top of PVC I	Elevation:		NA			
Scree	n Perforat	ion:	NA							Type/Thicker	nss of Seals:		NA			
Diam	eter of We	ell:	NA					-		Type of Sand			NA			
Scree	ned Interv	al:	NA													
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Septh (feet)	s per	trati		Sifica	ي ا					-		ran Pleti	ea C			
ob O	Blows per 6 inches	Penetration/ Recovery (inches)	Tine	USCS Classification	USCS Graphic	1		Material D	escription			Well Completion Diagram	PID Readings (ppm)	Samples	1	Remarks
0		36/30		SM	IIII		fine Sand a	nd Silt, some fin					<u> </u>		Odor.	Renarks
													75	ЛР7/1-2	ļ	
				ļ									,,,	31 //1-2		
1				1		Grading dark	gray.						20	JP7/2-3		
			l													
			İ		ЩЩ	7 .										
2			İ	SP		Brown fine to	o medium S	Sand, little coarse	e Gravel, wet.							
			İ													
3		36/0												l	No recover	
-		50,0		l											ING IECOVEL	у.
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4														ĺ		
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5	l					•										
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6		36/24	12:20			Grading brov	vn fine to m	edium Sand.					9	JP7/6-9		
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	1					3										
8						•										
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	ı		l l	l		:1								l	1	

NOTES:					
Groundwater 1	evel m	easured	down-hole	with v	vate

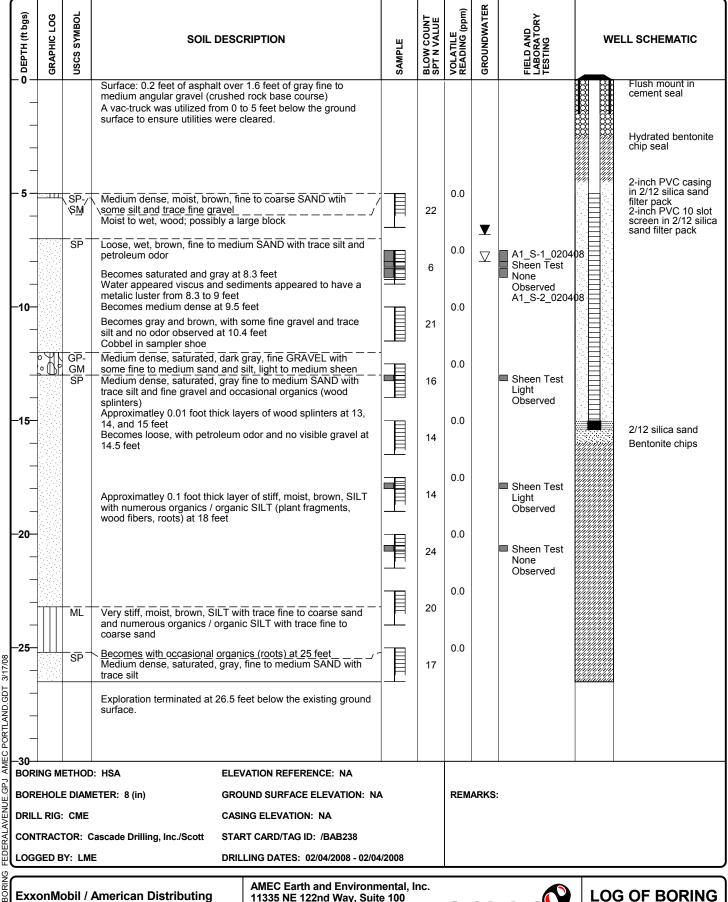
er level indicator. Groundwater sample JP7/GW collected at 12:20.

BORING COMPLETED AT 9'.

	Project No.: 31174 Boring: MW20 Plate: 1 OF 1 Site: Former Mobil Oil Terminal 46-108 Date: 07/03/02	_
ENVIRONMENTAL RESOLUTIONS, INC.	Drill Contractor: Cascade Drilling, Inc. of Woodinville, WA	_
Sample Method: None		
Drill Rig: CME-55	Bore Hole Diameter:8"_Signature: ner of property Registration:	-
in gravel next	to Federal Avenue. Logged by: Antonio Luna	_
\ <u>5</u> \		Ī
	GEOLOGIC DESCRIPTION	
	Removed steel well and point, backfilled with bentonite, capped with 1 foot of cement	
-5-	Total depth, 5 feet below ground surface	
		A
		Z
		Grout:
		2
		li
		N/A
		Size:
		Sand
		;
		A
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		Size:
		t N
		Slot
		i
		1/A
		N
		Diameter:
		me
		Casing
		Cas
FN: 31174B0020]

	Project No.: 31174 Boring: MW21 Plate: 1	OF 1								
ENVIRONMENTAL RESOLUTIONS, INC.	Site: Former Mobil Oil Terminal 46-108 Date:	07/03/02								
	Drill Contractor: Cascade Drilling, Inc. of Woodinvill									
Sample Method: None										
Drill Rig: <u>CME-55</u> Bore Hole Diameter: <u>10"</u> Signature: Location: <u>Southwest corner of property</u> Registration:										
in gravel next to Federal Avenue. Logged by: Antonio Luna										
(A)/////										
	GEOLOGIC DESCRIPTION	AN								
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	Ÿ	N. A.								
	Removed schedule 40 PVC well casing, overdrilled to remove seal and sand pack,									
	backfilled with bentonite,									
	capped with 1 foot of cement									
-5-										
	Total depth, 6 feet below ground surface									
		4								
		N/A								
		1 12								
		Grout:								
		ש								
		N/A								
		Size:								
		1								
		Sand								
		ည <mark>ှ</mark>								
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		Casing								
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FN: 31174B0021										

ERI	Project No.: 31174 Boring: Unknown Plate: 1 Site: Former Mobil Oil Terminal 46-108 Date:	
ENVRONMENTAL RESOLUTIONS, INC.	Drill Contractor: Cascade Drilling, Inc. of Woodinvil	le, WA
	Geologist: Antonio Lu	
Drill Rig: CME-55	Bore Hole Diameter:10" Signature:	
Location: Southwest cor	ner of property Registration: to Federal Avenue. Logged by: Antonio Lu	ına
$\sqrt{2}$		
	GEOLOGIC DESCRIPTION	AND REST
	Well overdrilled to remove well casing, seal, and sand pack, backfilled with bentonite, capped with 1 foot of cement	
-5-		
	Total depth, 6 feet below ground surface	
		Grout: N/A
		<u> </u>
		N/A
		Size:
		Sand S
		N/A,
] 1
		Size:
		Slot
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		j
		N/A
		Diameter:
		n gr
		Casing
FN: 31174H0unk	L	



ExxonMobil / American Distributing Company

7-915-15716-B

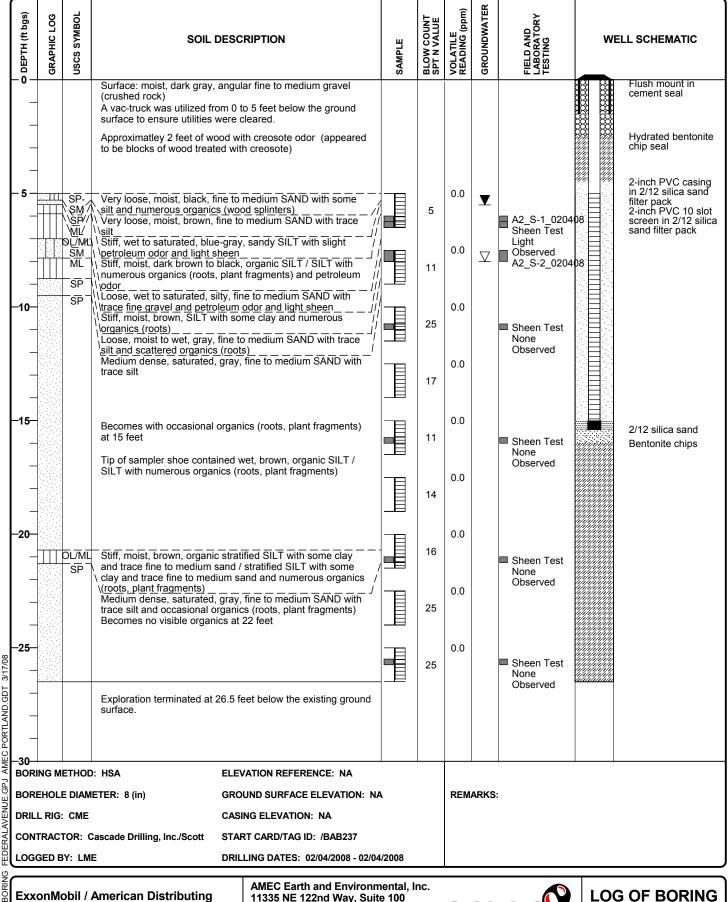
AMEC Earth and Environmental, Inc. 11335 NE 122nd Way, Suite 100 Kirkland, Washington USA 98034 Tel (425) 820-4669

Fax (425) 821-3914



LOG OF BORING MWA1

PAGE 1 OF 1



ExxonMobil / American Distributing Company

7-915-15716-B

AMEC Earth and Environmental, Inc. 11335 NE 122nd Way, Suite 100 Kirkland, Washington USA 98034 Tel (425) 820-4669

Fax (425) 821-3914



LOG OF BORING MWA2

PAGE 1 OF 1



Texaco Refining and Marketing Inc

3400 188th Street SW Suite 630 Lynnwood WA 98037

JUN 02 1998

April 20, 1998

DEPT. OF ECOLOGY

Recured by

Median as

Subsurface Investigation Results
Port of Everett – Former Bulk Facilities
2600 Federal Avenue, Everett, Washington

Bellevue, Washington 98008-5452

Mr. Norm Peck Washington Department of Ecology Northwest Region Toxic Cleanup Program Mail Stop NB-81 3190 - 160th Avenue SE

Dear Mr. Peck:

Enclosed is a copy of a Environmental Investigation Report for the above-referenced location. The report was prepared by Pacific Environmental Group (PEG) on behalf of Chevron Products Company, Texaco Refining and Marketing, Kimberly-Clark, and Burlington Northern Railroad. The work was conducted in response to Ecology's concern that petroleum bulk distribution facilities formerly located at the site had contributed to the free phase hydrocarbons (free product) identified in a City of Everett Combined Sewer Outfall (CSO Line) located between the subject site and the Mobil/American Distributing facilities to the south.

During June and July 1996, approximately 23,000 gallons of free product (identified as fuel oil) were recovered by others during excavation of the CSO Line. Extensive free product contamination had previously been identified at the Mobil/American Distributing facility. Mobil subsequently conducted a historical investigation of potential off-site sources of petroleum hydrocarbons, and former Standard Oil and Tidewater Oil bulk distribution facilities, located north of the CSO line were identified. Ecology identified Potentially Liable Parties (PLPs) associated with the former facilities and proposed an Agreed Order requiring an investigation to determine whether impacts from the former bulk facilities were contributing to the CSO Line problem.

Four of the PLPs, Chevron, Texaco, Kimberly-Clark, and Burlington Northern/Santa Fe Railroad, decided to conduct an investigation of the former terminals as an independent action in order to expedite the process. The investigation consisted of advancing 15 soil probes and collecting grab samples of groundwater, and installing and sampling two permanent groundwater monitoring wells. The results of the investigation are presented in the enclosed report.

No free product was observed during this investigation. In fact, the only significant dissolved hydrocarbon concentrations identified were in the two probes located adjacent to the CSO Line. Based on the results of this investigation, we believe that it is impossible to conclude that the free product found in the CSO Line is the result of operations at the former Chevron and Tidewater properties, now owned by Kimberley Clark.

Mr. Norm Peck April 20, 1998 Page 2

Additionally, fuel fingerprinting analysis, conducted during the CSO Line repairs, showed a strong correlation between the fuel oil from the CSO Line and the free product recovered from wells at the Mobil/American Distributing site. Based on these results, we believe that there is no reason to maintain any link between the former bulk plants and the Mobil/American Distributing/CSO problem. Further, we see no reason to conduct additional investigation. Please feel free to contact me at (206) 774-6090 extension 227 if you have any questions regarding this report.

Sincerely

Tony Palagyi Project Manager

Texaco EH&S

Ann Marie Johnson

Project Manager

Chevron Products Company

Richard C. Abrams

Environmental Manager

Kimberly Clark

Bruce Sheppard

Manager Env. Remediation

Burlington Northern/Santa Fe

- Soil Borings were very

Shallow perhaps too Shallow

Considering fill history

- well screening size may

have been too fight to allow

Environmental viscous fluids to collect.

Investigation Report

may not be acceptable to

Former Bulk Fuel Facilities

WHOE, Norm Reck.

2600 Federal Avenue

Prepared for

Everett, Washington

Chevron Products Company, Texaco Refining and Marketing, Kimberly-Clark, and BNSF

April 14, 1998

Prepared by

Pacific Environmental Group, Inc. 4020 - 148th Avenue NE, Suite B Redmond, Washington 98052

Project 520-165.1A



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Table 2 Groundwater Analytical Results

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Figure 2 Site Map - Exploration Locations

Figure 3 Site Map - Groundwater Sample Concentrations

Appendix A - Investigative Procedures/Field Data Sheets

Appendix B - Boring Logs

Appendix C - Laboratory Analytical Methods and Results
Chain of Custody Documentation

EXECUTIVE SUMMARY

An environmental assessment of soil and groundwater conditions was performed at 2600 Federal Avenue in Everett, Washington. Pacific Environmental Group, Inc. (PEG) conducted this assessment on behalf of Chevron, Texaco, Kimberly-Clark, and BNSF. The scope of work for this environmental assessment was presented in a sampling and analysis workplan dated August 20, 1997, and was performed between November 17, 1997 and January 19, 1998. This workplan was developed in response to the Washington Department of Ecology's decision to name Chevron, Texaco, Kimberly-Clark, and BNSF as Potentially Liable Persons (PLPs), in regard to petroleum contamination found adjacent to the City of Everett Combined Sewer Outfall (CSO) line, which resulted in an oil release into Port Gardener Bay in 1995.

The project consisted of the following tasks:

- Install fifteen exploratory soil probes (Probe 1 through Probe 15).
- Install two soil borings and convert them to groundwater monitoring wells (KC-1 and KC-2).
- Collect soil and groundwater samples from the borings and probes.

Measurable thicknesses of separate-phase hydrocarbons were not identified in any of the soil probes or monitoring wells installed during this investigation. The analytical results from the soil probes and groundwater monitoring wells indicate that the highest concentrations of hydrocarbons in soil and groundwater are limited to the area immediately adjacent to the CSO line. There is no evidence from this investigation that the former facilities on the 2600 Federal Avenue property contributed to the separate-phase hydrocarbons encountered during repair of the CSO line in 1996.

1.0 INTRODUCTION

1.1 Scope of Work

This investigation was performed between November 17, 1997 and January 19, 1998. The purpose of this investigation was to evaluate soil and groundwater quality in the vicinity of several former petroleum bulk plants adjacent to Port Gardner Bay in Everett, Washington (Figure 1). The goal of this investigation was to show whether evidence exists that would suggest the former facilities contributed to the separate-phase hydrocarbons documented at the CSO line. The scope of work consisted of the following tasks:

- Prepare a site safety plan for the project in accordance with WISHA and OSHA regulations.
- Install fifteen exploratory soil probes (Probe-1 through Probe-15) using a direct push probe sampling rig, and a hand auger.
- Install two soil borings using a hollow-stem auger drilling rig. Convert the borings to groundwater monitoring wells (KC-1 and KC-2) using 2-inch diameter Schedule 40 PVC well casing with 0.020-inch slotted screen.
- Collect soil samples from the borings and probes for soil characterization and possible laboratory analysis.
- Conduct field screening of soil samples using a photoionization detector and an oil sheen test.
- Develop and sample the two newly installed monitoring wells.
- Submit soil and groundwater samples and appropriate documentation to a Washington State accredited laboratory for analyses.
- Prepare this report.

Each of these tasks is described in detail in Section 2.0, and the findings and conclusions are presented in Sections 3.0 and 4.0.

1.2 Site Description

The project site is located on the Port Gardner Bay waterfront near Federal Avenue and the foot of Everett Avenue in Everett, Snohomish County, Washington. The property being investigated is currently the site of a pulp and paper mill owned by Kimberly-Clark, a railroad right-of-way owned by BNSF, and part of the Port of Everett that includes a log yard and a towing business (Dunlap Towing), hereafter referred to as "the Site". The Site was the former location of petroleum bulk plants operated by Standard Oil of California (Chevron) and Associated Oil Company (Texaco). Aboveground petroleum storage tanks were also operated on the Site until recently by Kimberly-Clark. Figure 2 shows the locations of former facilities in relation to the current property use.

The subject property is located in the NE ¼ of the SW ¼, and the NW ¼ of the SE ¼, Section 19 of Township 29 North, Range 5 East, Willamette Meridian. According to the United States Geological Survey topographic map of Everett, Washington, the property is located approximately 10 feet above mean sea level.

1.3 Previous Investigations

PEG is not aware of any previous environmental investigations performed at the former Bulk Plant facilities with respect to petroleum hydrocarbons.

Based on information provided by PTI Environmental Services Inc., assessment and remediation activities have occurred on and directly adjacent to the Mobil/American Distributing Co. site, that is located directly south of the Kimberly-Clark mill. In August and October of 1995, the U.S. Coast Guard responded to an oil discharge in Port Gardener Bay that was traced to the City of Everett combined sewer outfall (CSO). The CSO line runs east-west directly south of the Kimberly-Clark warehouse (Figure 2). The oil from the discharge was matched to a sample from the Mobil/American Distributing Co. site.

In April 1996, an Agreed Order was issued by Ecology to Mobil and American Distributing Co., which focused on elimination of oil discharge from the CSO line, followed by definition of the nature and extent of contamination. In June and July 1996, the CSO line was excavated and repaired. Approximately 23,000 gallons of #3 or #4 fuel oil were recovered during dewatering activities for the CSO line repair by Mobil/American Distributing Co. Approximately 800 cubic yards of petroleum contaminated soil were hauled off-site for disposal by Mobil/American Distributing Co.

2.1 Soil Probe Installation

Transglobal Environmental Geosciences Northwest Inc. (TEG) of Olympia, Washington installed fourteen exploratory soil probes (Probe 2 through Probe 15) to depths ranging from 4 to 13 feet below grade on November 17 and 18, 1997. Soil probe locations were positioned in proximity to former facilities on the Site that could be potential sources of petroleum hydrocarbons, and adjacent to the CSO line. A direct-push hydraulic drive point system was used and a PEG geologist using the Unified Soil Classification System logged the borings. Following the collection of soil samples, the borings were abandoned by grouting with a bentonite sealant to the surface. Investigative procedures are presented in Appendix A. Soil probe locations are presented on Figure 2. Soil probe logs are presented in Appendix B.

2.1.1 Soil and Groundwater Sampling

Soil Probe 1 could not be accessed with the Strataprobe rig, therefore a soil sample was collected from this location utilizing a stainless steel hand auger. Soil samples were collected continuously from a depth of one foot below grade to the bottom of the soil borings in soil Probe 2 through Probe 4, and Probe 7 through Probe 15, utilizing a direct-push hydraulic drive point system. Soil samples were collected continuously from a depth of three feet and two feet below grade in soil Probe 5 and Probe 6, respectively. Soil samples retained for chemical analyses were placed in laboratory supplied sample jars with Teflon[®] lined lids. The samples were placed on ice during transport and submitted to North Creek Analytical, Inc. in Bothell, Washington for chemical analysis. Groundwater samples were also collected from each probe location utilizing a screened probe section which was sampled using a peristaltic pump with disposable tubing.

Soil samples were field screened for the presence of organic vapors using a Thermo Environmental Instruments Inc. Model 580B PID with a 10.0 electron volt (eV) lamp. Soil screening procedures are described in Appendix A. It should be noted that the PID measurements are considered semi-quantitative data since the instrument detects all organic compounds with ionization potentials less than 10 eV. PID results for the soil samples ranged from non-detectable levels to 86 parts per million (ppm). In addition, the soil samples were

field screened for oil sheens. Oil sheen screening procedures are presented in Appendix A. The results of this field screening are also recorded on the exploratory boring logs in Appendix B.

2.2 Soil Borings and Monitoring Well Installation

Two exploratory soil borings (KC-1 and KC-2) were drilled by Cascade Drilling of Bothell, Washington on January 16, 1998. The boring locations were chosen to determine if the former facilities might have contributed to the petroleum hydrocarbons observed in the CSO line excavation. The borings were installed to depths of approximately 16.5 feet below the floor within the existing Kimberly-Clark warehouse. The borings were moved slightly from the original locations in the sampling and analysis workplan to avoid high-traffic areas. Holes were cut through the concrete floor to allow drilling equipment to access the soil.

There was an open space between the warehouse floor and the ground surface. The ground surface was approximately five feet below the concrete warehouse floor at Well KC-1, and approximately 4.5 feet below the floor at Well KC-2. The casings for these two wells protrude above the ground surface and are completed just below the warehouse floor to allow access from within the warehouse. The exploratory boring logs show detail of this well completion arrangement.

2.2.1 Soil Sampling

Eight-inch outside diameter hollow-stem auger drilling equipment was used and a PEG geologist using the Unified Soil Classification System logged the borings. Initial soil samples were collected at approximately seven and nine feet below the warehouse floor, and sampling continued thereafter at approximately five-foot intervals to the total depth explored. Soil samples for chemical analyses were retained in laboratory-supplied glass jars with TeflonTM lined lids. The samples were placed on ice for transport to North Creek Analytical, Inc. accompanied by chain-of-custody documentation. Investigative procedures and sample preservation techniques are presented in Appendix A. Boring locations are shown on Figure 2. Soil samples were field screened for oil sheens and for the presence of organic vapors using a PID. PID test procedures and oil sheen field screening procedures are described in Appendix A. The results of the field screening are recorded on the exploratory boring logs in Appendix B.

2.2.2 Well Casing Installation

The two borings were converted to groundwater monitoring wells (KC-1 and KC-2) with the installation of 2-inch diameter, Schedule 40 PVC casing with 0.020-inch factory slotted screen. The well screen was placed across the saturated zone and extended from approximately 2 feet to 10 feet below ground surface in Well KC-1, and from approximately 1.5 feet to 11.5 feet

below ground surface in Well KC-2. Ground surface refers to the soil surface below the warehouse floor. Refer to the boring logs in Appendix B for specific information on well construction. The annular space of each well was packed with a graded 10x20 Colorado silica sand. The sand pack was placed across the entire screened interval, extending approximately six inches above the top of the screens. The annular space of each well was then sealed with hydrated bentonite chips to the ground surface beneath the warehouse floor. A plug-type locking device was installed at the top of each monitoring well. A metal plate able to withstand forklift traffic was placed in the opening of the concrete floor. Soil cuttings generated during drilling remained beneath the warehouse floor.

2.2.3 Well Development and Groundwater Sampling

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Monitoring Wells KC-1 and KC-2 were developed on January 16, 1998 by surging and bailing. Well development procedures and records are presented in Appendix A.

Groundwater samples were collected from Wells KC-1 and KC-2 on January 19, 1998. Depths to groundwater in Wells KC-1 and KC-2 on this date were 6.53 feet and 5.78 feet below top of casing, respectively. Well locations are shown on Figure 2.

Prior to sampling, each well was visually checked for the presence of sheens using a clear single-use disposable polyethylene bailer. No sheens were observed in the wells. The wells were then purged of a minimum of three casing volumes of water by bailing. Groundwater samples were collected after the wells recovered to at least 60 percent of the pre-purge static water level. Samples were collected with a single-use disposable bailer. Groundwater sampling procedures are described in detail in Appendix A. Field sampling data sheets are also presented in Appendix A.

One blind duplicate sample (KC-X) was collected from Monitoring Well KC-2. One trip blank sample (Trip Blank) was also prepared utilizing laboratory provided deionized water, and was carried throughout the sampling event.

Development and purge water was placed directly into the mill's wastewater disposal system.

2.3 Analytical Program

Soil and groundwater samples that were selected for laboratory testing were analyzed for one or more of the following parameters:

PARAMETER **	METHOD
Total Petroleum Hydrocarbons as gasoline (TPH-gasoline)	Washington Method WTPH-G
TPH-diesel and TPH-oil	Washington Method WTPH-D plus Extended
Dongene teluene ethyl hangene	The state of the state of the state of
Benzene, toluene, ethyl benzene and xylenes (BTEX compounds)	EPA Method 8020

The samples were analyzed by North Creek Analytical of Bothell, Washington.

3.1 Subsurface Conditions

In general, soil encountered during soil probe and monitoring well installations consisted of silty sand, and sand. Occurrences of clay, wood, and organic material were also noted in some locations. Boring logs that show detailed lithologic descriptions are included in Appendix B. Groundwater was generally encountered during soil probe installation at depths less than five feet below grade. Measurable thicknesses of separate-phase hydrocarbons were not observed in any of the soil probe or boring locations. Hydrocarbon sheens were noted in soil samples from Probe 6, Probe 7, and Probe 11. On January 19, 1998, depth to groundwater in Monitoring Wells KC-1 and KC-2 was 6.53 feet and 5.78 feet below top of casing, respectively, which is approximately 1.5 feet below the ground surface under the warehouse floor.

3.2 Sample Analytical Results

3.2.1 Soil

A total of three soil samples were submitted for analysis from soil Probe 7, soil Probe 11, and Boring KC-1. The soil samples collected from the soil probes were submitted for analysis based on the observation of sheens during field screening. The soil sample submitted from Boring KC-1 was collected from just above the groundwater interface. Concentrations of TPH-gasoline, TPH-diesel, and TPH-oil were detected in the three soil samples, however all concentrations were below the respective MTCA Method A cleanup levels.

The soil analytical results are summarized in Table 1. Laboratory analytical reports and chain-of-custody documentation are included in Appendix C. Figure 2 should be referenced for sample locations.

3.2.2 Groundwater

Groundwater samples from Probe 3, Probe 4, Probe 5, Probe 7, and Probes 10 through 15 contained detectable concentrations of TPH-gasoline, TPH-diesel, TPH-oil, or BTEX compounds. However, only the samples from Probe 7, Probe 11, Probe 13, and Probe 14

only 3 Sant

contained TPH-diesel and/or TPH-oil concentrations exceeding MTCA Method A cleanup levels. The samples from Probe 7 and Probe 11 (closest to the CSO line) contained the highest TPH concentrations. Concentrations of TPH-diesel in Probe 7 and Probe 11 were 52,400 parts per billion (ppb) and 56,000 ppb, respectively. Concentrations of TPH-oil in Probe 7 and Probe 11 were 38,400 ppb and 43,900 ppb, respectively. Groundwater analytical results are summarized in Table 2.

The groundwater sample from Well KC-1 contained a detectable concentration of TPH-diesel, below the MTCA Method A cleanup level. The sample from Well KC-2 contained no detectable concentrations of TPH or BTEX compounds. Groundwater analytical results are summarized in Table 2.

A blind duplicate water sample (KC-X) was submitted for analysis, along with a trip blank. The blind duplicate was a duplicate sample from Well KC-2. The blind duplicate contained detectable concentrations of TPH-gasoline and TPH-diesel. Blind duplicate sample KC-X does not correlate with the non-detectable concentrations observed in the sample from Well KC-2, and may indicate a field or laboratory error. However, the concentrations reported in Sample KC-X were not significantly higher than the method reporting limits, and may represent a statistical variation in the laboratory analysis. Concentrations of TPH or BTEX were not detected in the trip blank sample.

Laboratory analytical reports and chain-of-custody documentation are included in Appendix C. Figure 3 should be referenced for sample locations and TPH concentrations.

4.0 CONCLUSIONS

Based on laboratory analytical data, the following conclusions can be made:

- No measurable thicknesses of separate-phase hydrocarbons were identified in any of the soil probes or monitoring wells installed during this investigation.
 - Detected concentrations of TPH-gasoline, TPH-diesel, TPH-oil, and toluene in the soil samples analyzed from the exploratory soil probes and borings did not exceed the respective Washington State Model Toxics Control Act (MTCA) Method A cleanup levels.
- Groundwater samples collected from soil Probe 7 and soil Probe 11 (nearest the CSO line) exceeded the MTCA Method A cleanup level for TPH-diesel at levels of 52,400 ppb and 56,000 ppb, respectively.
- Groundwater samples collected from soil Probe 7 and soil Probe 11 (nearest the CSO line) exceeded the MTCA Method A cleanup level for TPH-oil at levels of 38,400 ppb and 43,900 ppb, respectively.
- Groundwater samples collected from soil Probe 13, and soil Probe 14 exceeded the MTCA Method A cleanup level for TPH-oil at levels of 1,420 ppb and 2,930 ppb, respectively.
- All other detected concentrations of BTEX compounds, TPH-gasoline, TPH-diesel, and TPH-oil in groundwater samples were below the MTCA Method A cleanup levels.

The analytical results from the soil probes and groundwater monitoring wells demonstrate that the highest concentrations of hydrocarbons in soil and groundwater are found immediately adjacent to the CSO line. There is no evidence from this investigation that the former facilities located north of the CSO line contributed to the separate phase hydrocarbons encountered during repair of the CSO line.

5.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

ENVIRONMENTAL INVESTIGATION

2600 Federal Avenue Everett, Washington February 12, 1998

PEG Project Number 520-165.1A

This report prepared for:

Chevron Products Company, Texaco Refining and Marketing Inc., Kimberly-Clark, and BNSF

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TABLE 2 GROUNDWATER ANALYTICAL RESULTS

Former Bulk Fuel Facilities 2600 Federal Avenue Everett, Washington

Sample I.D.	Date	Benzene (ppb)	Toluene (ppb)	Ethyl- benzene (ppb)	Xylenes (ppb)	TPH- Gasoline (ppb)	TPH- Diesel (ppb)	TPH-Oil (ppb)
Probe 2	11/17/97	ND	ND	ND	ND	ND	ND	ND
Probe 3	11/17/97	ND	ND	ND	ND	ND	ND	766
Probe 4	11/17/97	0.877	0.569	0.602	2.52	137	276	ND
Probe 5	11/17/97	ND	ND	ND	ND	64.6	ND	ND
Probe 6	11/17/97	ND	ND	ND	ND	ND	ND	ND
Probe 7	11/17/97	ND	ND	ND	ND	327	52,400	38,400
Probe 8	11/17/97	ND	ND	ND	ND	ND	ND	ND
Probe 9	11/17/97	ND	ND	ND	ND	ND	ND	ND
Probe 10	11/17/97	ND	0.672	ND	ND	ND	ND	ND
Probe 11	11/17/97	ND	ND	ND	4.86	736	56,000	43,900
Probe 12	11/17/97	ND	0.715	ND	ND	ND	ND	ND
Probe 13	11/18/97	ND	ND	ND	ND	ND	ND	1,420
Probe 14	11/18/97	ND	ND	ND	ND	ND	311	2,930
Probe 15	11/18/97	ND	1.26	1.23	2.37	172	ND	ND
KC-1	01/19/98	ND	ND	ND	ND	ND	430	ND
KC-2	01/19/98	ND	ND	ND	ND	ND	ND	ND
KC-X*	01/19/98	ND	ND	ND	ND	57.9	355	ND
Trip Blank	01/19/98	ND	ND	ND	ND	ND	NA	NA
MTCA Method A	Cleanup Levels:	5.0	40	30	20	1000	1000	1000
Laboratory Repor	ting Limits:	0.50-1.0	0.50-1.0	0.50-1.0	1.00	50.0	250	750

Concentrations reported as parts per billion (ug/l)

Certified analytical results are included in Attachment B

ND - Not Detected at or above the laboratory reporting limit

NA - Not Analyzed

TPH as Diesel and Oil - Analysis by Washington Method WTPH-D plus extended

TPH as Gasoline - Analysis by Washington Method WTPH-G

BTEX Compounds - Analysis by EPA Method 8020A

^{* -} KC-X is a duplicate sample from Well KC-2

TABLE 1 SOIL ANALYTICAL RESULTS

Former Bulk Fuel Facilities 2600 Federal Avenue Everett, Washington

Sample I.D.	Date	Depth (feet)	Benzene (ppm)	Toluene (ppm)	Ethyl- benzene (ppm)	Xylenes (ppm)	TPH- Gasoline (ppm)	TPH- Diesel (ppm)	TPH-Oil
Probe 7-3	11/17/97	3.0	ND	0.0545	ND	ND	ND	17.6	71.1
Probe 11-4	11/17/97	4.0	ND	ND	ND	ND	20.7	19.6	52.5
KC1-8.5	01/16/98	8.5	ND	. ND	ND	ND	6.50	52.7	81.8
MTCA Metho	d A Cleanu	p Levels:	0.5	40	20	20	100	200	200
Laboratory Re	eporting Lin	nits:	0.050	0.050	0.050	0.10	5.0	10.0	25.0

Concentrations reported as parts per million (mg/kg)

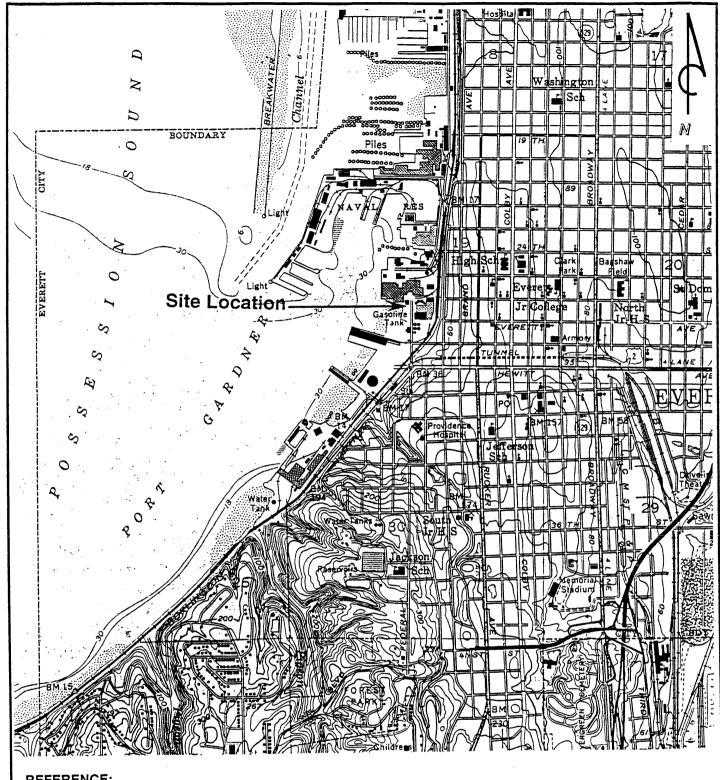
Certified analytical results are included in Attachment B

ND - Not detected at or above the laboratory reporting limits

TPH as Diesel and Oil - Analysis by Washington Method WTPH-D plus extended

TPH as Gasoline - Analysis by Washington Method WTPH-G

BTEX Compounds - Analysis by EPA Method 8020A



REFERENCE:

USGS 7.5 MIN. TOPOGRAPHIC MAP TITLED: Everett, Washington

DATED: 1953 REVISED: 1968 and 1973

COUNTY: Snohomish

SCALE: 1 to 24,000 (1 Inch = Approximately 2000 Feet)



MAP LOCATION

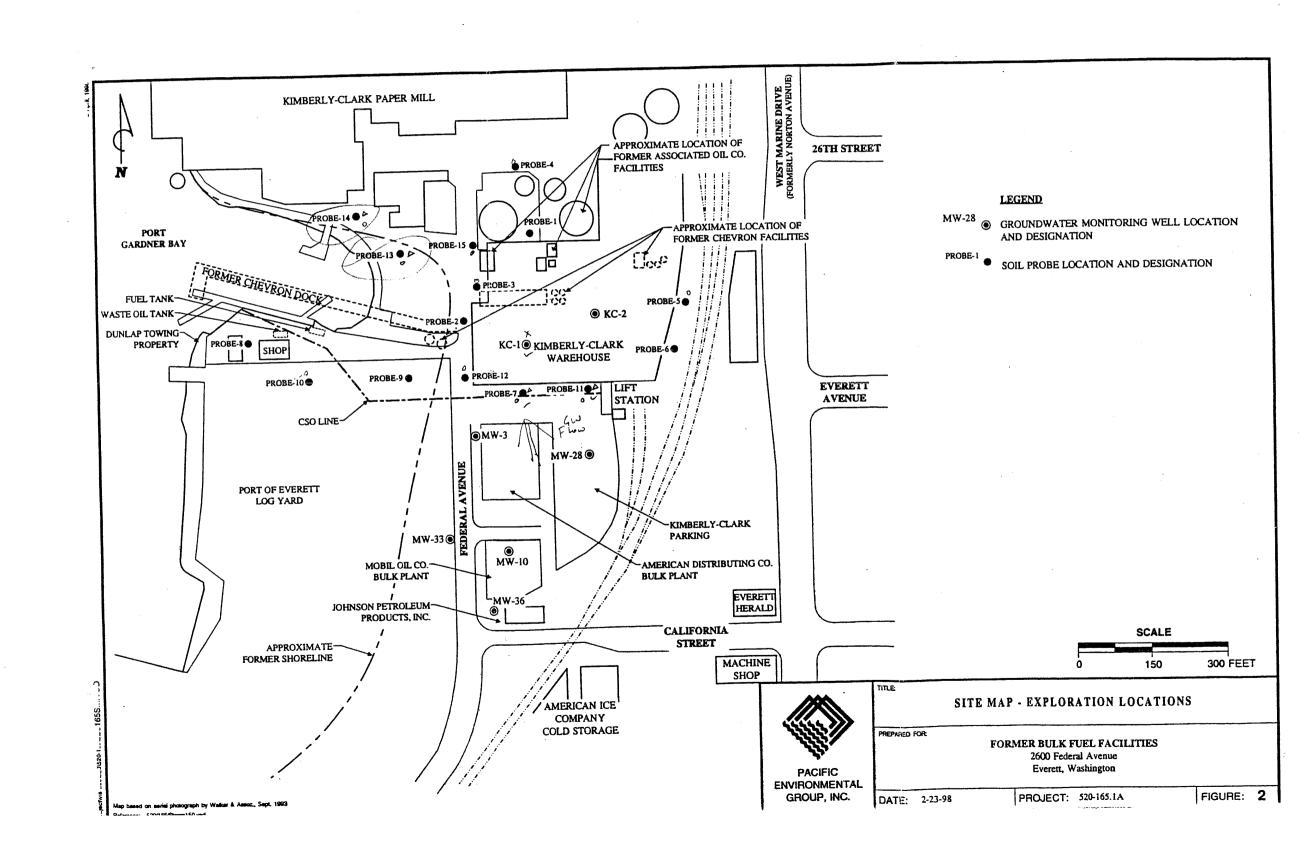


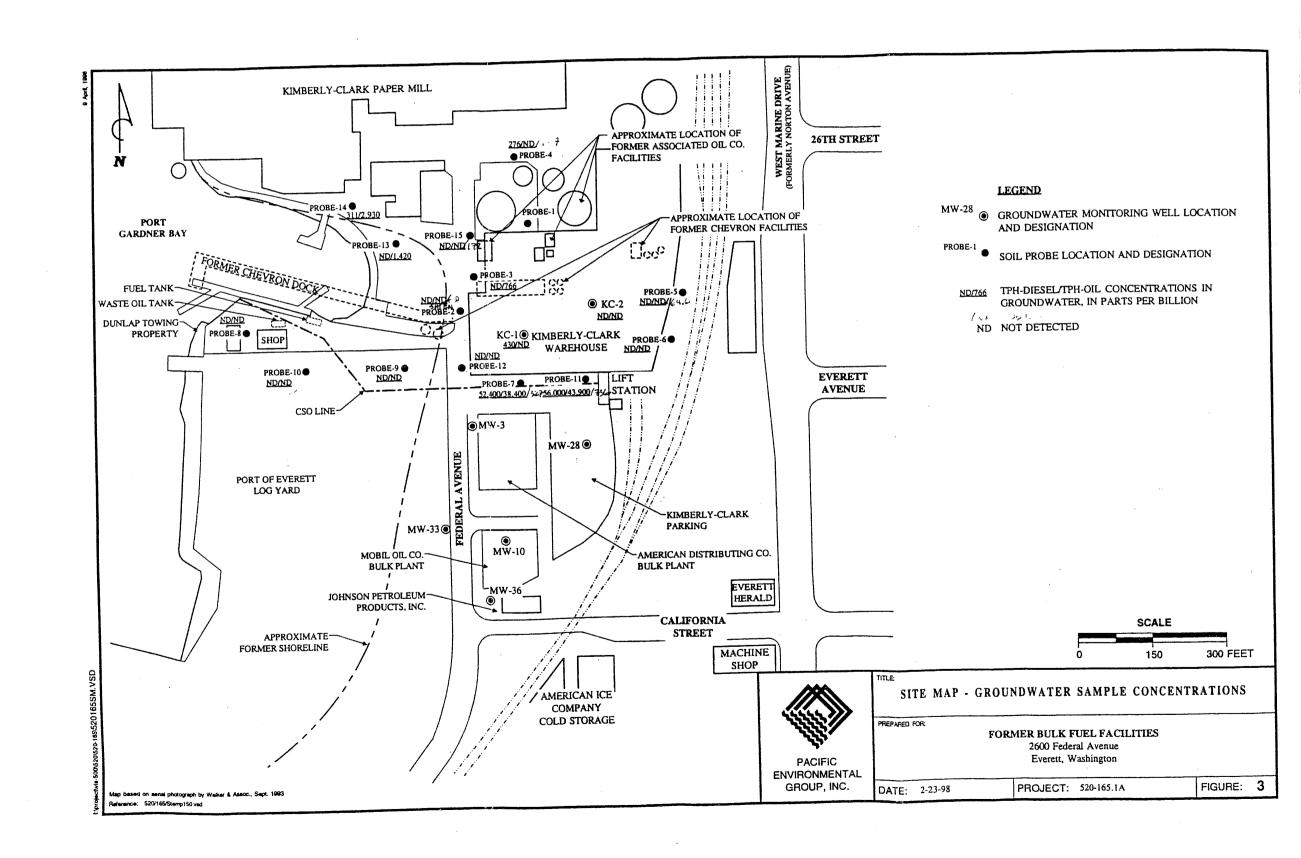
FORMER BULK FUEL FACILITIES 2600 Federal Avenue

Everett, Washington

SITE LOCATION MAP

FIGURE: 1 PROJECT: 520-165.1A







ADDENDUM TO DRAFT FOCUSED FEASIBILITY STUDY SAMPLING AND ANALYSIS WORK PLAN ExxonMobil / ADC Property, Ecology Site ID 2728 2717/2731 Federal Avenue Everett, Washington

Submitted to:

ExxonMobil Environmental Services

East Providence Terminal 1001 Wampanoag Trail Riverside, Rhode Island 02915

and

American Distributing Company

13618 45th Avenue NE Marysville, Washington 98271

Submitted by:

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11810 North Creek Parkway North Bothell, Washington 98011

February 10, 2010

AMEC Project No. 0-915-15716-D

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Attachment A1 Boring Logs for MW-A1 and MW-A2 Attachment A2 Site-Specific Health and Safety Plan

Attachment A3 City of Everett Street Use Permit Documentation

Attachment A4 Field Documentation Forms

ACRONYMS AND ABBREVIATIONS

ADC American Distributing Company
AMEC AMEC Earth & Environmental, Inc.

bgs below ground surface

BTEX benzene, toluene, ethylbenzene, and xylenes

COC chain-of-custodies
CSS Colorado silica sand
DQIs data quality indicators
DQOs data quality objectives

Ecology Washington State Department of Ecology

EDB ethylene dibromide EDC 1.2-dichloroethane

EPA U.S. Environmental Protection Agency

ExxonMobil ExxonMobil Oil Corporation
FFS Focused Feasibility Study
HASP Health and Safety Plan
HSA hollow stem auger

IDW investigation derived waste mg/kg milligram per kilograms

mg/L milligram/liter

MDLs method detection limits

MS/MSD matrix spike/matrix spike duplicate

mV millivolt

PAHs polycyclic aromatic hydrocarbons

PID photoionization detector

PPE personal protective equipment

ppm parts per million PVC polyvinyl chloride

Property ExxonMobil/ADC Property

QA quality assurance QC quality control

RPD relative percent difference SAP Sampling and Analysis Plan

SD standard deviation

TPH-D total petroleum hydrocarbons-diesel
TPH-O total petroleum hydrocarbons-oil
TPH-G total petroleum hydrocarbons-gasoline

VOCs volatile organic compounds
WAC Washington Administrative Code

WP Work Plan

ADDENDUM TO FFS SAP WORK PLAN 2717/2731 FEDERAL AVENUE EVERETT, WASHINGTON February 10, 2010

1.0 INTRODUCTION

AMEC Earth & Environmental, Inc., (AMEC) has prepared this Addendum to the October 2009 Draft Final Focused Feasibility Study (FFS) Sampling and Analysis (SAP) Work Plan (WP) on behalf of ExxonMobil Oil Corporation (ExxonMobil) and the American Distributing Company (ADC). This Addendum outlines additional soil and groundwater characterization activities that will be conducted to the north and west of the ExxonMobil/ADC Property (the Property) located at 2717 and 2731 Federal Avenue in Everett, Washington (Figure 1). The City of Everett (the City) is planning to upgrade the storm sewer line that will result in trenching within Everett Avenue and Federal Avenue. In advance of trenching, samples of the soil and groundwater will be collected from borings to determine soil and groundwater disposal options. This Addendum addresses the specific field sampling activities related to the borings, chemical analyses, and quality assurance (QA) procedures associated with borings along the utility alignment.

1.1 Property History

Historically, total petroleum hydrocarbons as diesel (TPH-D), oil (TPH-O), and gasoline (TPH-G), benzene, toluene, ethylbenzene, xylenes, polycyclic aromatic hydrocarbons (PAHs), and lead were found in soil and groundwater beneath the Property and beneath properties to the west, north, and east. Petroleum contamination has resulted from past releases from former operations at the ExxonMobil and ADC Parcels and other similar businesses in the area.

2.0 OBJECTIVES

The objective of the soil and groundwater characterization beneath Everett Avenue and Federal Avenue is to collect sufficient analytical data for disposal classification. Elements of this addendum are based on the Washington Administrative Code (WAC) Ecology Model Toxics Control Act (MTCA) Cleanup Regulations WAC 173-340-820 and City of Everett Waste Water discharge regulations. The proposed location for the disposal of soil from the utility excavation is the CEMEX facility in Everett. The soil and groundwater sampling will include the following activities:

- 1. Advance five borings (three along Everett Avenue and two along Federal Avenue [Figure 2]) to evaluate the concentration of chemicals in soil and groundwater. The borings will be advanced at each location using a hollow stem auger (HSA) drill rig to the total depth of the proposed trench at the location of each boring. Two of the borings will be terminated at a minimum depth of 20 feet below ground surface (bgs) to provide soil lithology information for the City's geotechnical engineer.
- 2. Collect continuous samples from the borings using a standard penetration test (SPT) and a split spoon (SS).

- Collect two to three composite soil samples from each boring for laboratory analyses.
 The first composite will be from the top four feet and the second from the lower four feet.
 Discreet samples for volatile organic compounds (VOC) analysis will be collected from the upper four feet and from the SPT.
- 4. Collect "grab" water samples from each boring. If sheen or product is encountered, an additional water sample will be collected from just below the water table (a foot or two below).
- 5. Soil samples will be analyzed for CEMEX acceptance criteria and "grab" groundwater samples will be analyzed for the City of Everett sanitary sewer discharge criteria. The soil and groundwater samples will be performed on a one-week turn-around schedule.

3.0 PROJECT ORGANIZATION AND RESPONSIBILITIES

The project is organized as follows:

ExxonMobil and ADC are the owners of the Property.

AMEC Earth & Environmental, Inc. (AMEC) is the environmental consultant for this project.

- Gary Dupuy (phone number 206-342-1777) and Meg Strong (phone number 425-368-0966) are the client managers for the project.
- Leah Vigoren (phone number 206-838-8470) is the project manager and is responsible for project management. Technical and administrative elements are included in her project management responsibilities.
- Anastasia Speransky (phone number 206-838-1776) is the task manager for the project and quality assurance manager for this project, which includes data quality objectives, and quality assurance/quality control (QA/QC) objectives as well as health and safety.

Cascade Drilling, Inc. in Woodinville, Washington, is the drilling contractor for the project.

Test America, Inc., in Nashville, Tennessee, is responsible for managing analyses of the samples collected. The laboratory is also responsible for sample preparation and ensuring that the QA/QC results from the laboratory are valid.

The geotechnical engineer will be provided by the City of Everett.

4.0 DATA QUALITY OBJECTIVES

Data Quality Objectives (DQOs) is a quality management tool developed by the U.S. Environmental Protection Agency (EPA) that is used to facilitate the planning of data collection activities. The DQO process provides a systematic procedure for defining criteria in the data collection design. The primary reference for the formal DQO process is EPA's guidance document (EPA 1994). The DQO process consists of the following seven key steps.

- 1. State the problem.
- 2. Identify the decision.
- 3. Identify the inputs to the decision.
- 4. Define the boundaries of the study.
- 5. Develop a decision rule.
- Specify tolerable limits on decision errors.
- 7. Optimize the design for obtaining data.

DQOs are qualitative and quantitative statements, developed using the DQO process, that are intended to clarify study objectives, define an appropriate type of data, and specify tolerable levels of potential decision errors that will be used as the basis for establishing the quality and quantity of data needed to support decisions.

Data Quality Indicators (DQI) (accuracy, precision, completeness, representativeness, comparability, and method detection limits) refer to quality control criteria established for various aspects of data gathering, sampling, or analysis activity. In defining DQIs specifically for the project, the level of uncertainty associated with each measurement is determined.

Accuracy is the degree of agreement of a measurement with a known or true value. To determine accuracy, a laboratory or field value is compared to a known or true concentration. Accuracy is determined by such quality control (QC) indicators as: matrix spikes (MS), surrogate spikes, laboratory control samples (blind spikes) and performance samples.

Precision is the degree of mutual agreement between or among independent measurements of a similar property (usually reported as a standard deviation [SD] or relative percent difference [RPD]). This indicator relates to the analysis of duplicate laboratory or field samples. An RPD of ≤50% for water and ≤50% for soil, depending upon the chemical being analyzed, is generally acceptable. Typically field precision is assessed by field duplicates and laboratory precision is assessed using laboratory duplicates, matrix spike duplicates, or laboratory control sample duplicates).

Completeness is expressed as percent of valid usable data actually obtained compared to the amount that was expected. Due to a variety of circumstances, sometimes either not all samples scheduled to be collected can be collected or else the data from samples cannot be used (for example, samples lost, bottles broken, instrument failures, laboratory errors, etc.). The minimum percent of completed analyses defined in this section depends on how much information is needed for decision making. Generally, completeness percent goals increase when the fewer the number of samples are collected per event or the more critical the data are for decision making. Goals in the 90 to 95% range are typical.

Representativeness is the expression of the degree to which data accurately and precisely represent a characteristic of an environmental condition or a population. It relates both to the

area of interest and to the method of taking the individual sample. The idea of representativeness should be incorporated into discussions of sampling design. Representativeness is best assured by a comprehensive statistical sampling design, but it is recognized that this is usually outside the scope of most one-time events. Most one-time event SAPs focus on issues related to judgmental sampling and why certain areas are included or not included and the steps being taken to avoid either false positives or false negatives.

Comparability expresses the confidence with which one data set can be compared to another. The use of methods from EPA or "Standard Methods" or from some other recognized sources allows the data to be compared facilitating evaluation of trends or changes in a site, a river, groundwater, etc. Comparability also refers to the reporting of data in comparable units so direct comparisons are simplified (e.g., this avoids comparison of milligram/liter (mg/L) for nitrate reported as nitrogen to mg/L of nitrate reported as nitrate, or parts per million (ppm) vs. mg/L discussions).

Detection Limit(s) (usually expressed as method detection limits [MDLs] or Quantitation Limit[s]) for all analytes or compounds of interest for all analyses requested is presented in Tables 1 and 2. These limits should be related to any decisions that will be made as a result of the data collection effort. A critical element to be addressed is how these limits relate to any regulatory or action levels that may apply.

Data Review and Management

Data management will commence during the field investigation. Each soil and groundwater sample collected will be recorded in a bound field book which will include a description of the location, depth, matrix, sample ID, and date and time of collection. Once data has returned from the laboratory, the electronic deliverables will be reviewed to ensure the receipt of all requested analytes and again cross-checked with chain-of-custodies (COCs). Data will be tabulated in electronic spreadsheets and again checked to ensure proper entry before use in reporting.

Assessment Oversight

The project manager will ensure that sample methods and accurate documentation are being practiced. Quality assurance (QA) systems will be emplaced at regular intervals during the data management process as described above. Finally, a peer review process by a senior technical staff will be conducted on the final reporting.

Corrective Actions

Corrective actions, if necessary, shall be completed. If acceptance criteria were not met and a corrective action was not successful or corrective action was not performed, data will be flagged appropriately. Requirements and procedures for documenting the need for corrective actions are described in this section.

Items requiring corrective action in the laboratory shall be documented by the use of a corrective action report. The QA coordinator or any other laboratory member can initiate the corrective action report request in the event QC results exceed acceptability limits, or upon identification of some other laboratory problem. Corrective actions can include reanalysis of the sample or samples affected, re-sampling and analysis, or a change in procedures, depending upon the severity of the problem.

5.0 PRE-FIELD ACTIVITIES

AMEC will coordinate the field activities and contract a private utility locating service in addition to contacting the underground utilities location center (Call Before You Dig). In addition, AMEC will update an existing site-specific Health and Safety Plan (HASP) (Attachment A2).

Site access for the borings on Everett Avenue which is owned by Kimberly Clark will be obtained by the City of Everett. AMEC will prepare and submit to the City the traffic control plan and right of way access applications for the work (Attachment A3).

6.0 FIELD PROCEDURES

This section presents the field investigation procedures for the soil and groundwater sampling effort. The field investigation will consist of drilling soil borings and collecting soil and groundwater samples. The proposed soil boring locations are illustrated on Figure 2. The proposed soil boring depths and specifications are listed in Table 3.

6.1 Field Health and Safety Procedures

AMEC field personnel will adhere to the health and safety procedures detailed in the *Site-Specific Health and Safety Plan*. City staff must follow their own Health and Safety Plan.

The hospital closest to the Site is Providence Hospital. An emergency contact list and a map illustrating the emergency route to Providence Hospital are located in the *Health and Safety Plan*.

It is anticipated that all fieldwork will be performed using Level D modified personal protective equipment (PPE). At a minimum, each on-site worker will be required to wear safety footwear (steel-toed boots), hard hat, hearing protection, eye protection, and a high visibility safety vest. In addition, AMEC and AMEC's contractors will be required to wear hand protection (e. g. leather and/or nitrile gloves). PPE will be upgraded whenever there is a potential for direct contact with contaminated soil or groundwater. Changes in the required PPE will be based on changed work conditions and field observations. PPE upgrades may consist of the following:

- Tyvek Coveralls if a splash transfer is considered likely;
- Additional PPE upgrades that may be required, depending on breathing zone levels of petroleum hydrocarbons detected.

Eating, drinking, chewing gum or tobacco, smoking, or any practice that involves hand-to mouth contact increases the probability of contaminant ingestion and is prohibited in any area where the possibility of contamination exists.

Potential physical hazards that may be encountered include heat stress, slips, trips, and falls.

The AMEC field team will have current certifications for first aid, and a cell phone will be available at all times while personnel are in the field. All emergency response services will be reached by calling 911, from a land line if available.

6.2 Field Preparation

A Right of Way permit will be prepared and submitted to the City of Everett. The Traffic Control Plan is included in Attachment A3.

6.3 Utility Survey

AMEC will arrange a meeting with the City of Everett to mark the boring locations prior to initiation of field activities. During the markings of the borings, AMEC will identify all aboveground and overhead power lines. Proposed boring locations that are within 25 feet of an overhead power line will be moved until clearance is achieved. AMEC will also oversee a geophysical survey conducted by a private utility locator to identify subsurface utilities within 25 feet of the proposed soil boring locations. The presence of below-grade utilities will be identified, and their inferred locations will be marked on the ground surface at the site. In addition, subsurface activity locations may be reviewed with the City, if available at the time. During the utility location by the private contractor, the area noted as the former underground fuels lines will be specifically investigated in an attempt to identify the position of the pipes.

6.4 Calibration of Field Equipment

Calibration of a photo-ionization detector (PID) will occur daily at the beginning of field activities. Calibration results and times will be recorded in the field notes.

Calibration instructions for the PID are included with the equipment manuals enclosed in the equipment cases. In general, the PID will be used to screen soil for the presence of lighter end petroleum hydrocarbons, such as gasoline and benzene.

6.5 Soil Borings

Three soil borings (CE-1 through CE-3) will be advanced along Everett Avenue and two soil borings (CE-4 and CE-5) will be advanced along Federal Avenue (Figure 2). The borings will be advanced at each location using a HSA drill rig. Soil borings CE-1, CE-3, and CE-4 will be terminated at the total depth of the proposed trench at the location of each boring (approximately 8 feet bgs at each location). Soil borings CE-2 and CE-5 will be terminated at a minimum depth of 20 feet bgs to provide soil lithology information for the City. Proposed soil boring depths and specifications are listed in Table 3.

Per ExxonMobil Standard Operation Procedures (SOPs), 4-feet subsurface clearance will be performed by hand augering and vactor truck. The auger with round edges will be turned slowly and not forced through the soil. All soil boring locations are subject to change based on observed conditions in the field (aboveground and belowground utilities, existing equipment, etc.).

6.6 Soil Sample Collection

The purpose of the soil sampling is to characterize soil for proper disposal so that the City can direct load onto a truck during trenching. The first four feet generated during the hand augering for utility clearance will be composited to form the first sample. The second composite sample will be generated by blending continuous discreet soil samples collected by SPT from four to eight feet. Discrete samples for VOC and gasoline analysis will be taken from the composited upper sample and from the SPT.

The City of Everett's geotechnical engineer will log the lithology and obtain samples for grain size distribution analysis. AMEC's field representative will examine relevant chemical sample information (e.g., visual and olfactory observation and PID measurement) and will collect soil samples for laboratory analyses.

The guideline for the soil samples to be collected is as follows: In each boring, AMEC will collect two composite soil samples from two sampling intervals (1) the interval from the ground surface to 4 feet bgs using a hand auger and (2) from 4 feet bgs to the bottom of the boring (trench depth – approximately 8 feet). For composite soil samples, soil from each interval will be placed into a heavy 1-quart freezer Ziploc bag and mixed. Gravel and vegetation will be removed from the composite sample. If a discrete layer of asphaltic pavement is encountered, it will be excluded from the sample and its presence noted on the boring log. Composite samples will be collected in three 4-ounce soil jars. Samples will be labeled and chilled on ice in a cooler for delivery under proper chain-of-custody protocol to a Washington-certified analytical laboratory. It is assumed that AMEC will collect two to three discrete soil samples and two to three composite soil sample per boring for laboratory analyses.

Two discrete soil samples will be either collected from the composite sample between zero and four feet bgs and one the SPT. Selection of the sampling location will be based on (1) the interval that exhibited the highest VOC vapor concentration, as measured with a PID and/or (2) intervals of petroleum hydrocarbon staining or odors and/or (3) heavy contamination such as free product is encountered. If VOCs are not detected and no staining or odor is observed, the discreet samples will be collected from a the composite material and the other from below the water table. Discreet soil samples will be collected using a soil core syringe and inserted into a pre-tared 40 milliliter volatile organic analyses (VOA) vial in accordance with EPA Method 5035 sampling methodologies. In addition, a discrete soil sample will be collected in one 4-ounce soil jars for moisture analysis.

Samples for laboratory analyses below the proposed trench depth will not be collected except to assess lithology. To prevent cross contamination, any equipment repeatedly in contact with the soil will be decontaminated before and after each individual sampling attempt.

6.7 Soil Sample Analyses

The soil sample analytical program presented below is based on requirements of the disposal facilities (e. g. CEMEX).

A total of 11 discrete soil samples will be submitted to analytical laboratory for the following analyses:

- Gasoline range TPH, using Ecology method NWTPH as gasoline (NWTPH-Gx),
- All 11 samples will be analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX) and up to 3 of the 11 samples will be selected and submitted for volatile organic compounds (VOCs) by EPA Method 8260B. The three samples will be selected based on visual or olfactory indications of hydrocarbons.

A total of 11 composite soil samples will be submitted to analytical laboratory for the following analyses:

- RCRA eight metals (Ag, As, Ba, Cd, Cr, Hg, Pb, Se) by U. S. Environmental Protection Agency (EPA) Method 200/6000/7000 Series.
- In addition, it is likely that a significant number of the soils may exceed the lower MTCA Method A soil cleanup limit of 19 milligrams per kilogram (mg/kg) for total chromium. A note will be placed on each chain-of-custody directing the laboratory to automatically perform a follow-up hexavalent chromium analysis using EPA Method 7196A for any sample whose total chromium result exceeds 19 mg/kg. We estimate that two samples will be requested to be analyzed for hexavalent chromium.
- If any soil analytical result (in mg/kg) is equal to or greater than 20 times the maximum concentration for the hazardous waste toxicity characteristics listed in 40 CFR 261.24 (in milligrams per liter [mg/L]), then the sample may be analyzed using Toxicity Characteristic Leaching Procedure (TCLP) using U. S. EPA Methods 1311 and 6010 series. (Sample volume will be held for TCLP analysis at the laboratory. We will direct the laboratory to provide notification prior to issuance of the laboratory report so that hold times would be met).
- Diesel and heavy oil range Total Petroleum Hydrocarbons (TPH), using Ecology Method Northwest Total Petroleum Hydrocarbon as diesel and lube oil (NWTPH-Dx). All NWTPH-Dx samples will be prepared in the analytical laboratory using silica gel acid wash to eliminate non-petroleum hydrocarbon interferences.
- Low-level polycyclic aromatic hydrocarbons (PAHs) by EPA method 8270D SIM.

Soil sample methods, required sample containers, preservation requirements, and holding times are provided in Table 4.

Soil samples will be submitted to Ecology-certified Test America, Inc. analytical laboratory located in Nashville, Tennessee for one-week turn around analytical time.

6.8 Groundwater Sample Collection

To collect a "grab" groundwater sample, a temporary 2-inch-diameter, flush-threaded Schedule 40 polyvinyl chloride (PVC) with a 5-foot-long slotted screen will be installed in each boring. The well screens will be installed to straddle the water table. Sand (10/20 CSS) will be placed in the annular space surrounding the screens to minimize turbidity. The sand pack will extend to a height of at least 1 foot above the top of the screen.

Following placing of a screen, water from the temporary well will be pumped using a submersible pump to minimize the amount of suspended solids, and a "grab" water sample will be collected either with a disposable bailer or peristaltic pump. AMEC will record the volume of water removed. The purged groundwater will be contained in 55-gallon drums and stored at the Property pending the analytical results and the City's construction schedule.

6.9 Groundwater Sample Analyses

The groundwater sample analytical program presented below is based on the chemicals likely to be in groundwater from past uses of the Property that may be required to be tested for the holder to discharge water into Port Gardner Bay. For the City of Everett, this includes stormwater that runs through the City's storm drain system as well as treated water discharged from Everett's Water Pollution Control Facility. To comply with the City's discharge regulations, five "grab" groundwater samples from the borings will be analyzed for:

- RCRA 8 metals (Ag, As, Ba, Cd, Cr, Hg, Pb, Se) by EPA Method 6010B/7470A (reporting limit less than 1 microgram per liter),
- Corrosives (pH) by field testing, and
- TPH and BTEX.

Groundwater samples will be submitted to Ecology-certified Test America, Inc. analytical laboratory located in Nashville, Tennessee for one-week turn around analytical time.

In addition, Gene Bennett, a City of Everett discharge expert, will be available at 425-257-8249 for the water discharge questions.

6.10 Sample Containers, Preservation and Storage

Soil and groundwater samples will be collected and placed into precleaned sample containers provided by the analytical laboratory in accordance with Table 4. Upon collection, sample containers will be sealed, labeled, chilled to 4°C in a cooler with ice, and maintained with AMEC's custody until delivery to the project analytical laboratory, Test America, Inc., in Nashville, Tennessee.

6.11 Equipment Decontamination

Decontamination of sampling equipment will be performed to maintain data quality, to prevent cross contamination, and to prevent the potential introduction of contaminants into previously

unimpacted areas. Reusable sampling equipment, including the drill rig, down-hole drilling equipment, and stainless-steel materials, will be decontaminated prior to each sampling event. General decontamination procedures for nondedicated soil and groundwater sampling equipment and accessories are as follows.

- Physically remove soils using a nonphosphate detergent solution.
- Rinse with noncontaminated tap water.
- · Rinse with deionized water.
- Rinse with Isopropyl alcohol.
- Air dry.

6.12 Investigation Derived Waste Management

Investigation Derived Waste (IDW) generated during the course of the field investigation will be labeled and securely stored on the Property in 55-gallon drums approved by the U.S. Department of Transportation. Drums will be stored at a designated location. The various waste streams will include the following:

- Potentially contaminated liquids, including fluids derived from purging and equipment decontamination water;
- Potentially contaminated solids, principally soil cuttings; and
- Personal protective equipment (PPE).

Each drum will be labeled with standardized IDW drum labels to indicate its contents, date of collection, location from which the IDW originated, and other pertinent information. In addition, all drums will also be labeled with indelible paint sticks or pens. AMEC will maintain an inventory of the drums. The purged groundwater and soil cuttings will be stored at the Property pending the analytical results and the City's construction schedule. PPE will be placed in a separate 55-gallon drum and disposed off-site at an appropriate facility.

7.0 DOCUMENTATION

The integrity of data obtained from samples collected during the field investigation depends on proper sample management and handling. Proper sample management includes sample labeling, which includes assignment of a specific identification number and affixing proper identification and markings to the collected samples. Proper handling includes proper packing and transport of the sample containers.

7.1 Field Logbook

The field logbook serves as the primary record of field activities. Entries shall be made chronologically and in sufficient detail to allow the writer or a knowledgeable reviewer to reconstruct the applicable events. The field logbook shall be bound with consecutively numbered and water repellent pages.

At a minimum, the following information will be recorded in either the field logbook or a separate sample log sheet during the collection of each sample:

- Sample location and description;
- Sampler's name(s);
- Date and time of sample collection;
- Type of sample (soil or groundwater);
- Type of sampling equipment used;
- Field instrument readings and calibration; and
- Field observations and details related to analysis or integrity of samples (e.g., weather conditions, noticeable odors, colors, etc.).

7.2 Labeling

Each sample container sent to the lab will have a unique sample identification label. The following information will be included on the sample label:

- Project name and location;
- Project number;
- Sample identification number;
- Date and time of collection; and
- Initials of the sampler.

Each soil sample will be named by the boring number and depth (or depth interval) of sample collection in feet. For example, a discrete soil sample collected from soil boring CE-1 at a depth of 6 feet will have a sample designation as "CE-1-6." A composite soil sample from soil boring CE-2 at a depth interval from the surface to the soil/water interface that was encountered at 3.5

feet bgs will have a sample designation as "CE-2-0-3.5." "Grab" groundwater samples will be named by the boring location, and identified as a grab sample with the date of sample collection. For example, a "grab" groundwater sample collected from boring CE-1 on February 22, 2010, would be named "CE1-G022210."

Duplicate samples will be sent to the laboratory blindly. However, the location of the sample will not be revealed to the laboratory. Instead, duplicate samples will be named sequentially as Dup-1 and Dup-2. The location of the duplicate sample collection will be recorded in the field notebook.

7.3 Sample Chain of Custody

COC forms will be completed at the end of each sampling day. The completed COC form(s) and samples will be kept in the possession of the field team until relinquishing the samples to the laboratory or courier service. One copy of the completed COC form will be kept by the field team, and the original COC form will be stored in a resealable plastic bag and transported in the sample container with the laboratory samples. Custody seals will be placed along the seal of each sample container in order to prevent tampering with the samples. A copy of the COC form is included in Attachment A4.

8.0 DATA VALIDATION

Data validation is the procedure of reviewing data against a known set of criteria to verify data validity prior to its use. Data validation procedures have been developed by the US EPA to standardize the validation process for analytical results for both water-quality and soil-quality investigations and are documented as the *US EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review,* US EPA, Office of Solid Waste and Emergency Response, Washington, D.C., Publication 9240.1-48, US EPA-540/R-08-01 (US EPA 2008). The Functional Guidelines are intended to be used as a guide for evaluation of data generated under statements of work for organic and inorganic analyses associated with the US EPA Contract Laboratory Program (CLP). The Functional Guidelines also provide general data validation guidelines that can be applied to data generated by non-CLP analytical methods.

One hundred percent (100%) of the analytical data for soil and groundwater samples will be validated using EPA Stage 4 data validation level. Stage 4 validation includes an examination of sample and QC raw data and instrument printouts to check for technical, calculation, analyte identification, analyte quantitation, and transcription or reduction errors. At a minimum 10% of reported results on summary forms should be confirmed by recalculation. The data validation staff will review field documents and laboratory data report packages, and if needed, apply data qualifiers to the data. The data reviewer will determine if the project data quality objectives have been met, and will calculate the data completeness for the project.

9.0 QUALITY CONTROL

This Addendum has been prepared to provide instructions and guidance to ensure the sample chemical data collected in support of the site soil and groundwater sampling results are scientifically valid. The sections below outline methods and processes to meet these objectives.

9.1 Field Quality Control Samples

To evaluate quality control (QC), a blind field duplicate sample will be collected at a frequency of 5 percent of the samples for each matrix (soil and groundwater).

Two trip blank vials provided by the laboratory will be placed into the cooler designated to store samples to be analyzed for VOCs to evaluate the potential for cross-contamination. Field duplicates are replicate samples collected at the same location during the same sampling session (roughly at the same time). The field duplicate samples will be collected in the same container types and handled and analyzed in the same manner, as all other soil and groundwater samples. The field duplicates will be analyzed for the same analytes as the primary sample.

9.2 Laboratory Quality Control Samples

Laboratory QC samples are analyzed as part of standard laboratory practice. The laboratory monitors the precision and accuracy of the results of its analytical procedures through analysis of QC samples. In part, laboratory QC samples consist of Matrix Spike/Matrix Spike Duplicate (MS/MSD) samples for organic analyses, and MS/MSD for inorganic analyses. The term "matrix" refers to use of the actual media collected in the field (e.g., routine soil and water samples). Laboratory QC samples are an aliquot (subset) of the field sample. They are not separate samples, but a special designation of an existing sample. The laboratory QC samples will be analyzed for the same analytes as the standard samples.

9.3 Field Variances

As conditions in the field may vary, it may become necessary to implement minor modifications to the sampling as presented in this Addendum. When appropriate, ExxonMobil, ADC, and the City of Everett will be notified and a verbal (followed by a written verification) approval will be obtained before implementing the changes. Modifications to the approved plan will be documented in the sampling project report.

9.4 Data Management

Data management will commence during the field investigation. Each soil and groundwater sample collected will be recorded on field logs, which will include a description of the location, depth, matrix, sample ID, and date and time of collection. All data submittals will be consistent with Ecology Policy 840 (dated March 31, 2008) Environmental Information Management (EIM) submittal requirement format. Once data have been provided by the laboratory, the electronic

deliverables will be reviewed to ensure the receipt of all requested analytes and again cross-checked with COCs.

10.0 REFERENCES

- AMEC Earth & Environmental, Inc. (AMEC), 2009. Draft Final Focused Feasibility Study Work Plan for ExxonMobil / ADC Property, Ecology ID 2728, 2717/2731 Federal Avenue, Everett, Washington, Bothell, Washington, October 2.
- U.S. Environmental Protection Agency (EPA), 1994. *Guidance of the Data Quality Objectives Process*, EPA QA/G-4. EPA/600/R-96/055, EPA Office of Research and Development, Washington, D.C. September.
- Puls, R.W. and Barcelona, M.J., 1996. Low-Flow (Minimal Drawdown) Groundwater Sampling Procedures, U.S. EPA /540/S-95/504
- Washington State Department of Ecology (Ecology), 2001. *Model Toxics Control Act Cleanup Regulation*, Chapter 173-340 WAC. Publication No. 94-06

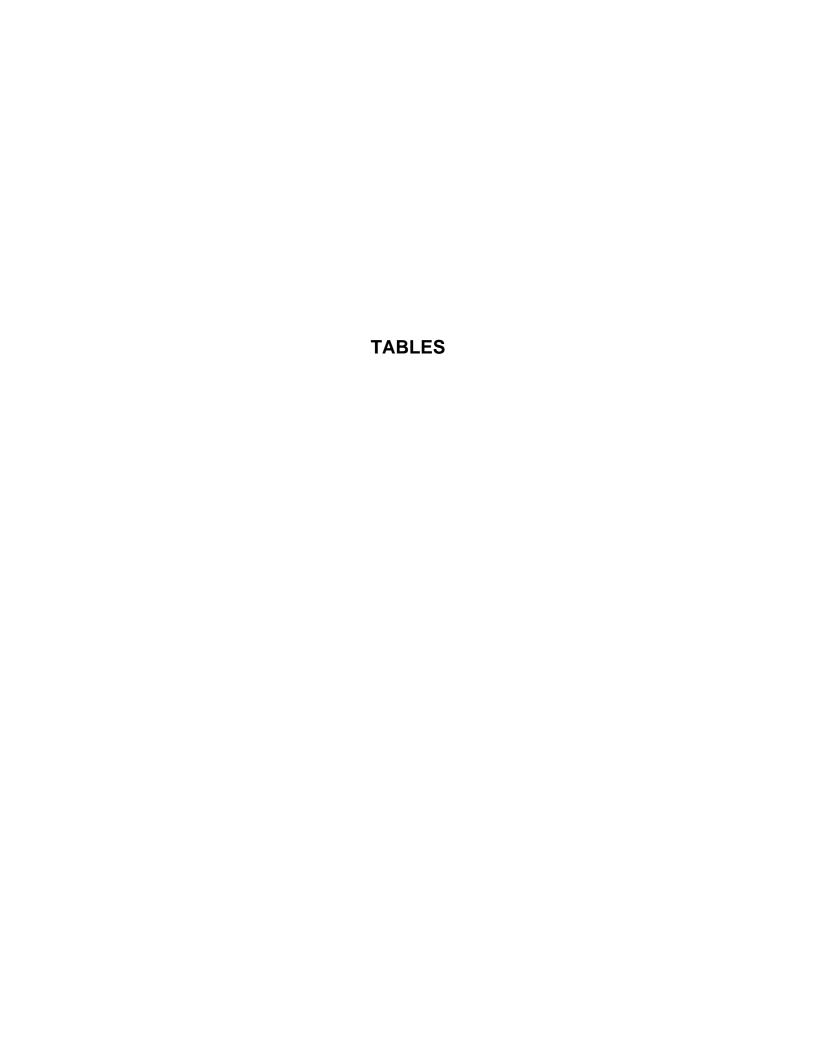


Table 1. Method Detection and Reporting Limits for Soil Samples

Specific Method	Analyte	MDL	MRL	Units
SW846 8260B	Acetone	0.0250	0.0500	mg/kg
SW846 8260B	Benzene	0.000670	0.00200	mg/kg
SW846 8260B	Bromobenzene	0.000670	0.00200	mg/kg
SW846 8260B	Bromochloromethane	0.00102	0.00200	mg/kg
SW846 8260B	Bromodichloromethane	0.000400	0.00200	mg/kg
SW846 8260B	Bromoform	0.000400	0.00200	mg/kg
SW846 8260B	Bromomethane	0.000640	0.00200	mg/kg
SW846 8260B	2-Butanone	0.0170	0.0500	mg/kg
SW846 8260B	sec-Butylbenzene	0.000670	0.00200	mg/kg
SW846 8260B		0.000670	0.00200	
SW846 8260B	n-Butylbenzene	0.000670		mg/kg
	tert-Butylbenzene		0.00200	mg/kg
SW846 8260B	Carbon disulfide	0.000670	0.00500	mg/kg
SW846 8260B	Carbon Tetrachloride	0.000670	0.00200	mg/kg
SW846 8260B	Chlorobenzene	0.000670	0.00200	mg/kg
SW846 8260B	Chlorodibromomethane	0.000380	0.00200	mg/kg
SW846 8260B	Chloroethane	0.000420	0.00500	mg/kg
SW846 8260B	Chloroform	0.000670	0.00200	mg/kg
SW846 8260B	Chloromethane	0.00100	0.00200	mg/kg
SW846 8260B	2-Chlorotoluene	0.000670	0.00200	mg/kg
SW846 8260B	4-Chlorotoluene	0.000670	0.00200	mg/kg
SW846 8260B	1,2-Dibromo-3-chloropropane	0.00340	0.00500	mg/kg
SW846 8260B	1,2-Dibromoethane (EDB)	0.000520	0.00200	mg/kg
SW846 8260B	Dibromomethane	0.000670	0.00200	mg/kg
SW846 8260B	1,4-Dichlorobenzene	0.000720	0.00200	mg/kg
SW846 8260B	1,3-Dichlorobenzene	0.000430	0.00200	mg/kg
SW846 8260B	1,2-Dichlorobenzene	0.000430	0.00200	mg/kg
SW846 8260B	Dichlorodifluoromethane	0.00160	0.00200	mg/kg
SW846 8260B	1,1-Dichloroethane	0.000670	0.00200	mg/kg
SW846 8260B	1,2-Dichloroethane	0.000670	0.00200	mg/kg
SW846 8260B	cis-1,2-Dichloroethene	0.000670	0.00200	mg/kg
SW846 8260B	1,1-Dichloroethene	0.000670	0.00200	mg/kg
SW846 8260B	trans-1,2-Dichloroethene	0.000670	0.00200	mg/kg
SW846 8260B	1,3-Dichloropropane	0.000450	0.00200	mg/kg
SW846 8260B	1,2-Dichloropropane	0.000670	0.00200	mg/kg
SW846 8260B	2,2-Dichloropropane	0.000780	0.00200	mg/kg
SW846 8260B	cis-1,3-Dichloropropene	0.000670	0.00200	mg/kg
SW846 8260B	trans-1,3-Dichloropropene	0.000670	0.00200	mg/kg
SW846 8260B	1,1-Dichloropropene	0.000670	0.00200	mg/kg
SW846 8260B	Ethylbenzene	0.000670	0.00200	mg/kg
SW846 8260B	Hexachlorobutadiene	0.000630	0.00500	mg/kg
SW846 8260B	2-Hexanone	0.0170	0.0500	mg/kg
SW846 8260B	Isopropylbenzene	0.000670	0.00200	mg/kg
SW846 8260B	p-Isopropyltoluene	0.000670	0.00200	mg/kg
SW846 8260B	Methyl tert-Butyl Ether	0.000670	0.00200	mg/kg
SW846 8260B	Methylene Chloride	0.00200	0.00200	mg/kg
SW846 8260B	4-Methyl-2-pentanone	0.00200	0.0100	
SW846 8260B SW846 8260B		0.00290	0.0500	mg/kg
	Naphthalene			mg/kg
SW846 8260B	n-Propylbenzene	0.000670	0.00200	mg/kg
SW846 8260B	Styrene	0.000670	0.00200	mg/kg
SW846 8260B	1,1,1,2-Tetrachloroethane	0.000670	0.00200	mg/kg
SW846 8260B	1,1,2,2-Tetrachloroethane	0.000670	0.00200	mg/kg
SW846 8260B	Tetrachloroethene	0.000400	0.00200	mg/kg
SW846 8260B	Toluene	0.000400	0.00200	mg/kg

Table 1. Method Detection and Reporting Limits for Soil Samples

SW846 8260B	1,2,3-Trichlorobenzene	0.000920	0.00200	mg/kg
SW846 8260B	1,2,4-Trichlorobenzene	0.00102	0.00200	mg/kg
SW846 8260B	1,1,2-Trichloroethane	0.00111	0.00500	mg/kg
SW846 8260B	1,1,1-Trichloroethane	0.000400	0.00200	mg/kg
SW846 8260B	Trichloroethene	0.000830	0.00200	mg/kg
SW846 8260B	Trichlorofluoromethane	0.000670	0.00200	mg/kg
SW846 8260B	1,2,3-Trichloropropane	0.00103	0.00200	mg/kg
SW846 8260B	1,3,5-Trimethylbenzene	0.000400	0.00200	mg/kg
SW846 8260B	1,2,4-Trimethylbenzene	0.000420	0.00200	mg/kg
SW846 8260B	Vinyl chloride	0.000820	0.00200	mg/kg
SW846 8260B	o-Xylene	0.000670	0.00200	mg/kg
SW846 8260B	m,p-Xylene	0.000670	0.00300	mg/kg
SW846 8260B	Xylenes, total	0.00130	0.00500	mg/kg
SW846 8260B	Diisopropyl Ether	0.000670	0.00200	mg/kg
SW846 8260B	1,2-Dichloroethene (total)	0.00144	0.00200	mg/kg
SW846 8260B	1,1,2-Trifluorotrichloroethane	0.000590	0.00200	mg/kg
	, , ,			<u> </u>
SW846 8270D SIM	Acenaphthene	0.000300	0.00333	mg/kg
SW846 8270D SIM	Acenaphthylene	0.000400	0.00333	mg/kg
SW846 8270D SIM	Anthracene	0.000700	0.00333	mg/kg
SW846 8270D SIM	Benzo (a) anthracene	0.000300	0.00333	mg/kg
SW846 8270D SIM	Benzo (a) pyrene	0.000400	0.00333	mg/kg
SW846 8270D SIM	Benzo (b) fluoranthene	0.00160	0.00333	mg/kg
SW846 8270D SIM	Benzo (g,h,i) perylene	0.000300	0.00333	mg/kg
SW846 8270D SIM	Benzo (k) fluoranthene	0.000300	0.00333	mg/kg
SW846 8270D SIM	Chrysene	0.000600	0.00333	mg/kg
SW846 8270D SIM	Dibenz (a,h) anthracene	0.000400	0.00333	mg/kg
SW846 8270D SIM	Fluoranthene	0.000400	0.00333	mg/kg
SW846 8270D SIM	Fluorene	0.000500	0.00333	mg/kg
SW846 8270D SIM	Indeno (1,2,3-cd) pyrene	0.000300	0.00333	mg/kg
SW846 8270D SIM	1-Methylnaphthalene	0.000300	0.00333	mg/kg
SW846 8270D SIM	2-Methylnaphthalene	0.000400	0.00333	
SW846 8270D SIM		0.000400	0.00333	mg/kg
SW846 8270D SIM	Naphthalene Phenanthrene	0.000700	0.00333	mg/kg
				mg/kg
SW846 8270D SIM	Pyrene	0.000300	0.00333	mg/kg
NWTPH-Dx	TDLL Discal Decree by MMTDLL Dy (CCT)	0.00	4.00	
	TPH - Diesel Range by NWTPH-Dx (SGT)	2.00	4.00	mg/kg
NWTPH-Dx	TPH - Oil Range by NWTPH-Dx (SGT)	2.00	4.00	mg/kg
NIMTOLLO	TDLL NIMTDLL CV	0.500	F 00	m a /l. a
NWTPH-Gx	TPH - NWTPH-Gx	0.500	5.00	mg/kg
C/MO46 1011/0010D	Aragnia TCLD CW CO10D	0.0400	0.100	pa a /I
SW846 1311/6010B	Arsenic TCLP SW 6010B	0.0400	0.100	mg/L
SW846 1311/6010B	Barium TCLP SW 6010B	0.0100	0.100	mg/L
SW846 1311/6010B	Cadmium TCLP SW 6010B	0.00600	0.0100	mg/L
SW846 1311/6010B	Chromium TCLP SW 6010B	0.0260	0.0500	mg/L
SW846 1311/6010B	Lead TCLP SW 6010B	0.0210	0.0500	mg/L
SW846 1311/6010B	Selenium TCLP SW 6010B	0.0390	0.100	mg/L
SW846 1311/6010B	Silver TCLP SW 6010B	0.0280	0.0500	mg/L
SW846 1311/7470A	Mercury TCLP 7470A	0.00100	0.0100	mg/L
0141040 55455				
SW846 6010B	Arsenic Total EPA 6010B	0.700	1.00	mg/kg
SW846 6010B	Barium Total EPA 6010B	0.100	2.00	mg/kg
SW846 6010B	Cadmium Total EPA 6010B	0.200	1.00	mg/kg
SW846 6010B	Chromium Total EPA 6010B	0.500	1.00	mg/kg

Table 1. Method Detection and Reporting Limits for Soil Samples

SW846 6010B	Lead Total EPA 6010B	0.400	1.00	mg/kg
SW846 6010B	Selenium Total EPA 6010B	0.700	2.00	mg/kg
SW846 6010B	Silver Total EPA 6010B	0.500	1.00	mg/kg
SW846 7471A	Mercury 7471A	0.0400	0.100	mg/kg
SW846 7196A	Chromium, Hexavalent by EPA 7196A	1.70	2.00	mg/kg

TPH = Total Petroleum Hydrocarbon

EPA = U. S. Environmental Protection Agency

mg/kg = milligram per kilogram

mg/L = milligram per liter

MDL = method detection limit

MRL = method reporting limit

Table 2. Method Detection and Reporting Limits for Groundwater Samples

Specific Method	Analyte	MDL	MRL	Units
SW846 8260B	Benzene	0.410	1.00	ug/L
SW846 8260B	Ethylbenzene	0.350	1.00	ug/L
SW846 8260B	Toluene	0.350	1.00	ug/L
SW846 8260B	o-Xylene	0.330	1.00	ug/L
SW846 8260B	m,p-Xylene	0.400	2.00	ug/L
NWTPH-Dx	Diesel	28.0	100	ug/L
NWTPH-Dx	Motor Oil	28.0	100	ug/L
NWTPH-Gx	GRO (C4-C12) NW	40.0	100	ug/L
SW846 6010B	Arsenic Total EPA 6010B	0.00360	0.0100	mg/L
SW846 6010B	Barium Total EPA 6010B	0.00100	0.0100	mg/L
SW846 6010B	Cadmium Total EPA 6010B	0.000600	0.00100	mg/L
SW846 6010B	Chromium Total EPA 6010B	0.00260	0.00500	mg/L
SW846 6010B	Lead Total EPA 6010B	0.00210	0.00500	mg/L
SW846 6010B	Selenium Total EPA 6010B	0.00390	0.0100	mg/L
SW846 6010B	Zinc Total EPA 6010B	0.00500	0.0500	mg/L
SW846 7470A	Mercury Total 7470A	0.000100	0.000200	mg/L

TPH = Total Petroleum Hydrocarbon

EPA = U. S. Environmental Protection Agency

 $mg/L = milligram \ per \ liter \\ \mu/L = microgram \ per \ liter$

MDL = method detection limit

MRL = method reporting limit

Table 3 Soil and Groundwater Samples

Boring Number	City of Everett Trench Station Number	Trench Depth (ft bgs)	Drilling Method	Boring Depth (ft bgs)	Depth of Sampling (ft bgs)	Number of Soil Samples	Number of Groundwater Samples
CE-1	20+02	7.9	HSA	8	8	2	1
CE-2	18+00	7.5	HSA	20	8	3	1
CE-3	17+00	7.6	HSA	8	8	2	1
CE-4	15+50	6.75	HSA	7	7	2	1
CE-5	14+00	8	HSA	20	8	2	1
Duplicate samples						2	1
Total Samples						13	6

Duplicate samples will be collected from intervals exhibiting evidence of potential contamination, such as staining or odor.

ft bgs = feet below ground surface

HSA = hollow-stem auger

Table 4 Sample Containers, Preservation and Storage

Analysis	Method	Sample Container	Number of Containers	Preservation and Storage	Holding Times
Soil	ou	- Campio Contamo		0 to 1 to 9	
Gasoline Range Organics	NWTPH-Gx	40-mL vial (VOA) w/MeOH	1	4° C	14 days
Diesel Range Organics ¹	NWTPH-Dx	4 oz. CWM jar with PTFE lid	1	4° C	14 days
Volatile Organic Compounds	EPA 8260B	40-mL vial (VOA) w/stir bar ²	2	4° C	14 days
Polycyclic Aromatic Hydrocarbons	EPA 8270D	4 oz. CWM jar with PTFE lid	1	4° C	14 days
Metals	EPA 6010/6020	4 oz. CWM jar with PTFE lid	1	4° C	6 months
Mercury (Hg)/Hexavalent Chromium (CrVI)	EPA 7471/7196	4 oz. CWM jar with PTFE lid	1	4° C	28 days
Water					
Gasoline Range Organics	NWTPH-Gx	40-mL vial (VOA) w/HCl	1	HCl pH<2, 4° C	14 days
Diesel Range Organics ¹	NWTPH-Dx	4 oz. CWM jar with PTFE lid	1	4° C	14 days
BTEX	EPA 8260B	40-mL vial (VOA) w/HCl	2	4° C	14 days
Metals (total)	EPA 200.7/200.8	500-mL HDPE	1	HNO ₃ pH<2, 4° C	6 months
Mercury (Hg)	EPA 7470	500-mL HDPE	1	4° C	28 days
рН	EPA 150.1/9040	60-mL HDPE	1	4° C	ASAP

- 1. Silica gel cleanup will be performed on samples
- 2. Sample volume = 5 ounces

NW TPH = Northwest Tptal Petroleum Hydrocarbon

EPA = U. S. Environmental Protection Agency

CWM jar = Clear, wide-mouth glass jar

HCl = Hydrochloric acid

MeOH = Methanol

BTEX = benzene, toluene, ethylbenzene, total xylene

NaOH = sodium hydroxide

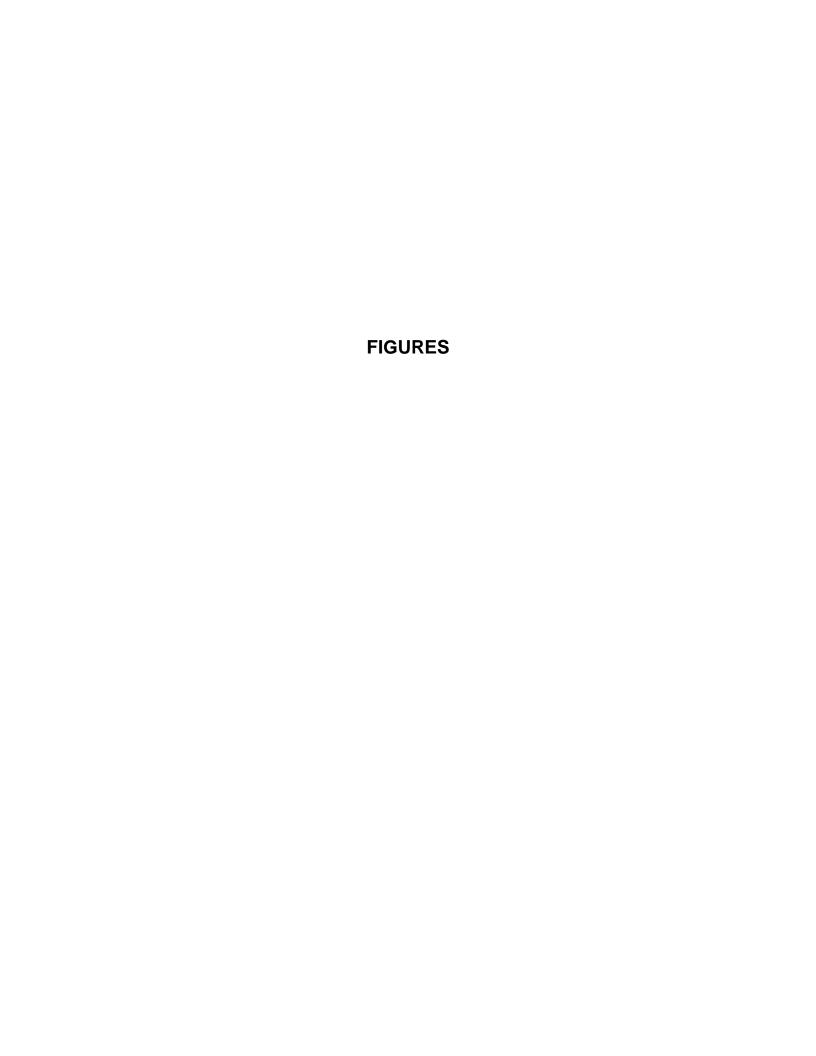
HNO3 = Nitric Acid

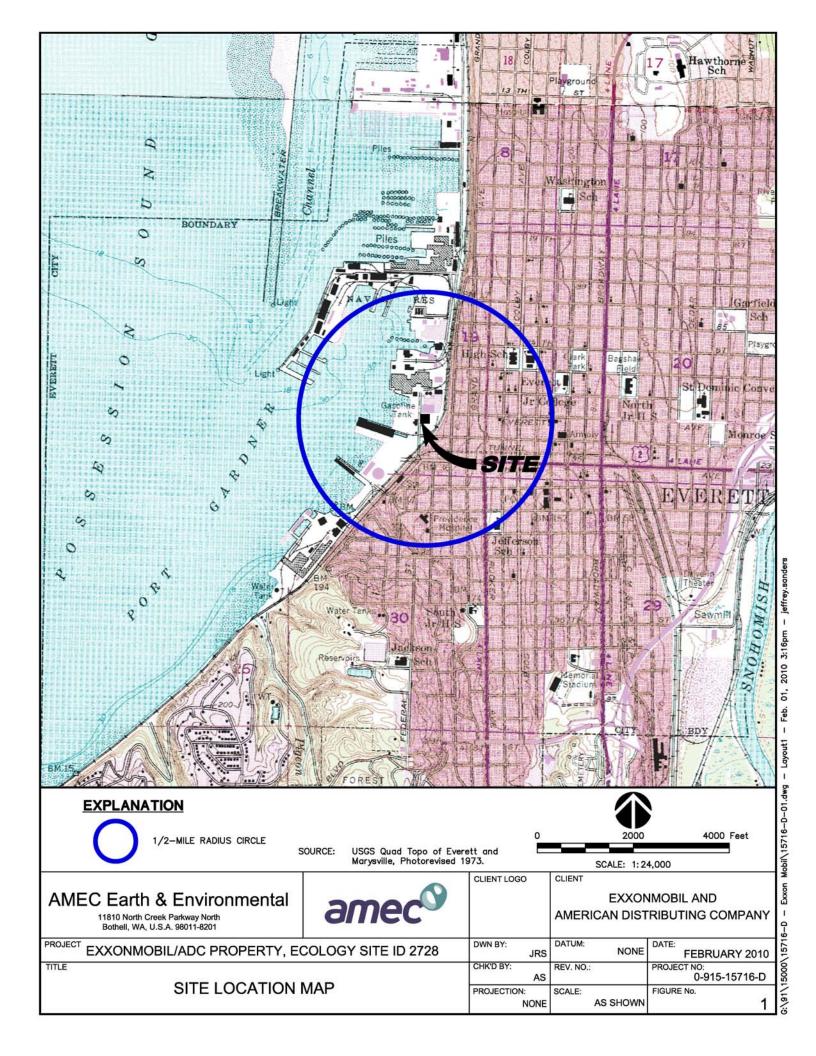
HDPE - High Density Polyethylene

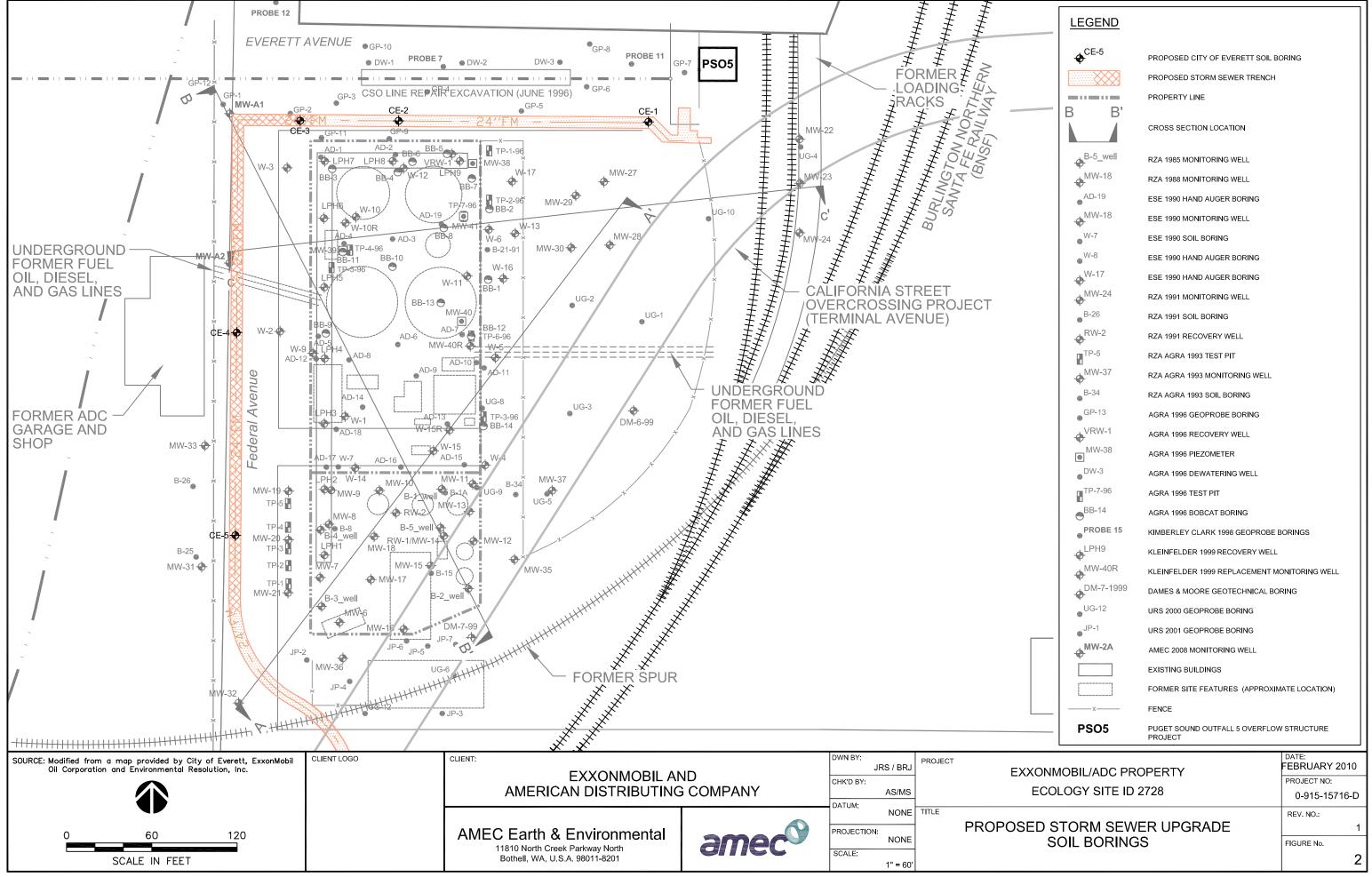
PTFE = teflon

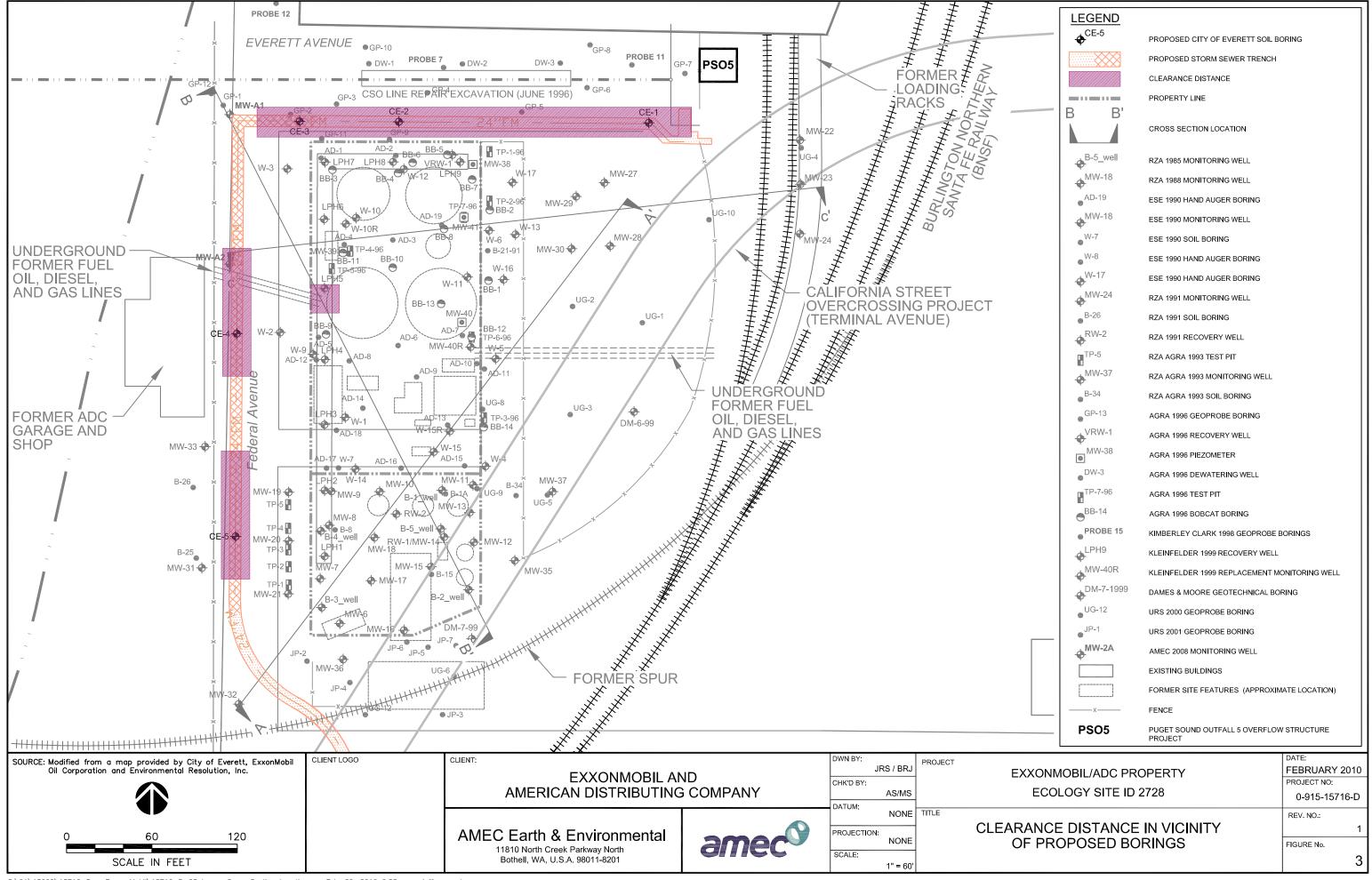
VOA = volatile organic analysis

mL = milliliter



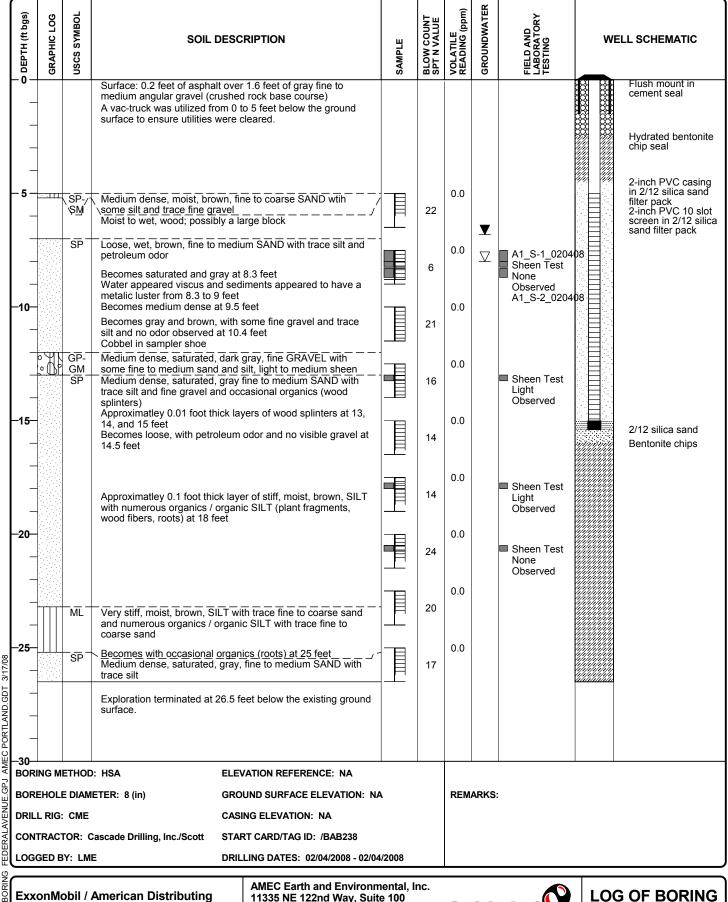






ATTACHMENT A1

Boring Logs for MW-A1 and MW-A2



ExxonMobil / American Distributing Company

7-915-15716-B

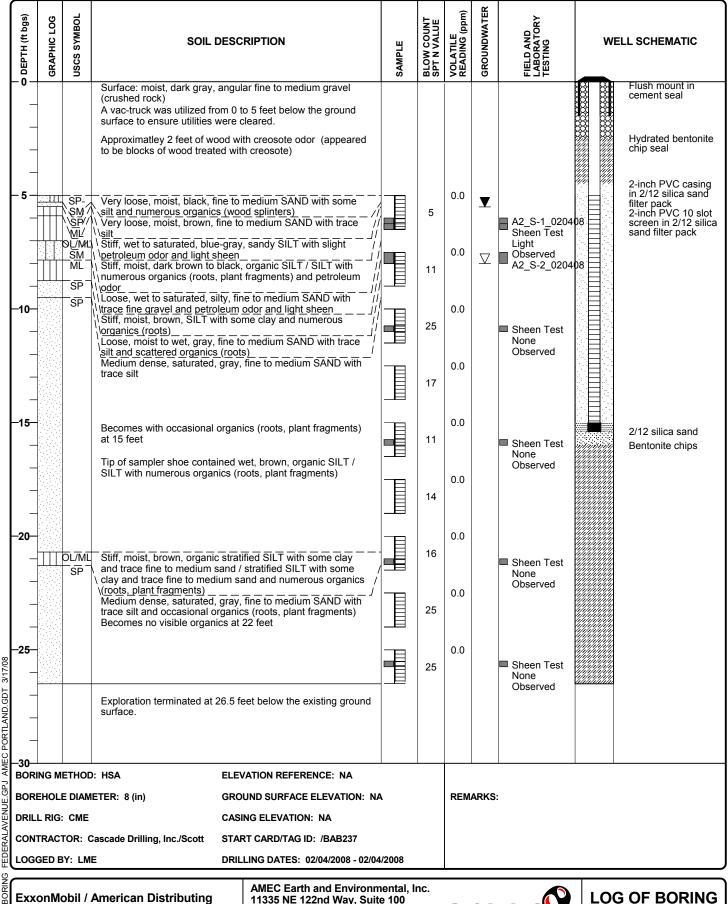
AMEC Earth and Environmental, Inc. 11335 NE 122nd Way, Suite 100 Kirkland, Washington USA 98034 Tel (425) 820-4669

Fax (425) 821-3914



LOG OF BORING MWA1

PAGE 1 OF 1



ExxonMobil / American Distributing Company

7-915-15716-B

AMEC Earth and Environmental, Inc. 11335 NE 122nd Way, Suite 100 Kirkland, Washington USA 98034 Tel (425) 820-4669

Fax (425) 821-3914



LOG OF BORING MWA2

PAGE 1 OF 1

ATTACHMENT A2

Site-Specific Health and Safety Plan





Site Safety Plan: Updated 02.10.10 Project Number: 0-915-15716-D page 1

Project Name: ExxonMobil / ADC Property, Ecology Site ID 2728, Everett, WA

SITE SPECIFIC HEALTH AND SAFETY PLAN

Project Name: ExxonMobil/ADC Property, Ecology Site ID 2728 Project Location: 2717/2731 Federal Avenue, Everett, Washington

Project Number: 9-91-51571-6C

THIS SITE SPECIFIC HEALTH AND SAFETY PLAN APPLIES ONLY TO AMEC PERSONNEL.

All site personnel must have completed the 8-hour ExxonMobil LPS Training prior to undertaking any field work at the site.

A PRE-ENTRY BRIEFING MUST BE HELD PRIOR TO INITIATING ANY SITE ACTIVITY AND AT OTHER TIMES AS NECESSARY TO ENSURE EMPLOYEES ARE APPRAISED OF THE SITE HEALTH AND SAFETY PLAN.

SAFETY PERSONNEL:

Health and Safety Coordinators: Leah Vigoren and Anastasia Speransky

Project Engineers: Leah Vigoren

Project Managers: Meg Strong and Gary Dupuy

Site Safety Coordinator (SSC): Leah Vigoren

Joe Abel: ExxonMobil Environmental Services (EMES) Client Contact:

EMERGENCY CONTACTS:

Hospital / Emergency Room: **Providence Medical Center** 425-258-7555

Map showing shortest route to Hospital is attached to this document.

911 Fire: Police: 911 Poison Control Center: 1-800-222-1222 Emergency Water Shut-off: Everett 1-425-257-8821 Electric Utility: Snohomish County PUD 1-877-783-1000 Washington State Patrol: 911

Health and Safety Coordinator: Leah Vigoren (Cell Phone: 206-351-9449) 206-342-1760 (w) Project Manager: Meg Strong (Cell Phone: 425-864-2096) 425-368-0966 (w)

AMEC Earth & Environmental, Inc. 11810 North Creek Parkway Bothell, Washington USA 98011 (425) 368-1000 Phone (425) 368-1001 Facsimile





SITE HISTORY

The approximate 1-acre site was purchased by ExxonMobil's historic predecessors in 1922, and was utilized as a petroleum bulk storage distribution facility between 1922 and 1974. In 1974, the then Mobile Company sold two thirds of the site (northern portion) to A.P. Miller (Miller), for use by the American Distributing Company (ADC). In 1987, Mobile discontinued petroleum storage and dispensing operations on their portion of the site and removed all storage tanks and ancillary equipment. In 1990, petroleum distribution was discontinued on the ADC parcel, and some improvements and tanks were removed from the parcel. Since then, the site has been turned into a parking lot and is leased to the Kimberly Clark facility located to the north of the site. Activities that have occurred on the site since this time have been environmental investigations and remedial activities to address petroleum impacts to soil and groundwater.

In 1985, site characterization activities were initiated to define the nature and extent of petroleum impacts beneath the site. Between 1988 and 1996, a variety of Interim Remedial Action Measures (IRAMs) were implemented to address the free product. In 1998, a Remedial Investigation/Focused Feasibility Study (RI/FFS) was performed in coordination of the Washington State Department of Ecology (Ecology) under the Consent Order. Remedial Action Objectives (RAOs) were developed for the site based on the RI data and baseline human health risk assessment. The remedy selected to achieve RAOs included the following.

- Construction of an interceptor trench along the down gradient margins of the site (entire western and northern boundaries) to mitigate the off-site migration of the light non-aqueous phase liquid (LNAPL) present on the shallow water table.
- 2) Placement of low-permeability cap across the entire site surface
- 3) Ongoing removal and disposal of recovered LNAPL from site monitoring wells and interceptor trench; and
- 4) Quarterly groundwater monitoring.

In addition, the City of Everett is planning to upgrade the storm sewer line that will result in trenching within Everett Avenue and Federal Avenue. In advance of trenching, samples of the soil and groundwater will be collected from borings to determine soil and groundwater disposal options. This HASP addresses the specific field sampling activities related to the advancement of the soil borings and soil and groundwater sampling.

ORGANIZATIONAL STRUCTURE

Project Manager(s):

Gary Dupuy (phone number 206-342-1777) and Meg Strong (phone number 425-368-0966) are the client managers for the project. Responsibilities include remaining in contact with regulatory agencies such as the Department of Ecology, overseeing the Project and ensuring client satisfaction from commencement to closeout.

Site Safety and Health Supervisor:

Leah Vigoren (phone number 206-838-8470) is the Project Manager and Health and Safety Coordinators (HSC). Primarily the duties of the HSC entail coordination with the Project Manager for preparation of site health and safety plans, assessment of chemical hazards and selection of safety / monitoring equipment.

Anastasia Speransky (phone number 206-838-1776) is the field geologist and is the Site Safety Coordinator (SSC). The SSC has the responsibility of implementing the Site Health and Safety Plan while at the Site. The SSC / HSC will be involved with the Project Manager in preparation of the Site Health and Safety Plan. If the plan is not being implemented or if unanticipated situations arise, the SSC / HSC may stop all proceedings and see that all personnel depart the site. The SSC / HSC will have charge of all instruments and see to their proper use and function.





Field Technicians:

Joseph C. Petrick is the Field Technician whose responsibilities include collecting soil and groundwater samples, keeping field records (I.e. Daily Field Logs) describing field activities, observations and site events. Supplying daily reports and reporting all incidents to the Project Engineer.

Subcontractor

Drilling company "Cascade Drilling, Inc." is responsible for the advancement of soil borings on the site.

ON SITE TASKS

Soil and groundwater will be characterized beneath Everett Avenue and Federal Avenue for disposal classification. Elements of this addendum are based on the Washington Administrative Code (WAC) Ecology Model Toxics Control Act (MTCA) Cleanup Regulations WAC 173-340-820 and City of Everett Waste Water discharge regulations.

The soil and groundwater sampling will include the following activities:

- 1. Advance five borings (three along Everett Avenue and two along Federal Avenue [Figure 2]) to evaluate the concentration of chemicals in soil and groundwater. The borings will be advanced at each location using a hollow stem auger (HSA) drill rig to the total depth of the proposed trench at the location of each boring. Two of the borings will be terminated at a minimum depth of 20 feet below ground surface (bgs) to provide soil lithology information for the City's geotechnical engineer.
- Collect continuous samples from the borings using a standard penetration test (SPT) and a split spoon (SS).
- 3. Collect two to three composite soil samples from each boring for laboratory analyses. The first composite will be from the top four feet and the second from the lower four feet. Discreet samples for volatile organic compounds (VOC) analysis will be collected from the upper four feet and at regular intervals to the base of the boring. In areas where heavy contamination such as free product is observed a separate sample will be collected.
- 4. Collect "grab" water samples from each boring. If sheen or product is encountered, an additional water sample will be collected from just below the water table (a foot or two below).
- 5. Soil samples will be analyzed for CEMEX acceptance criteria and "grab" groundwater samples will be analyzed for the City of Everett sanitary sewer discharge criteria. The soil and groundwater samples will be performed on a one-week turn-around schedule.

SAFETY & HEALTH HAZARDS ANALYSIS

a) Physical Hazards

Physical hazards that may be encountered during site activities include noise, manual lifting, powerful moving parts and weather related hazards (cold, heat stress, wind). Hard hats, safety glasses, hearing protection and steel-toed boots will be required for all personnel working in the vicinity of heavy equipment.

Identified hazards may be mitigated by using safe work practices at all times. The SSC has total responsibility for ensuring that all AMEC personnel on-site perform work tasks in a safe and sensible manner. If at any time the SSC determines that safe work practices are not followed, the tasks will be suspended and corrective actions will be taken.

Because of the potential of explosion hazard presented during groundwater monitoring (i.e., W-2) **SMOKING WILL NOT BE ALLOWED WITHIN 50 FEET OF THE WORK ZONE.**





The following are all additional site related hazards:

1) Traffic

- a. Cones will be set out around the work area and safety reflective vests will be worn.
- b. All drilling will be conducted with the traffic control.

2) Personnel or property damage from vehicle movement.

- a. When moving vehicles the following precautions must be taken
- b. Equipment must be stowed and secured
- c. A spotter must be used due to the presence of blind spots in the driver's field of vision.
- d. The spotter must identify any surface obstruction / anomalies
- e. Audible warning signals and hand signals must be used.
- f. Operator must yield to pedestrians.

3) Personal injury from handling heavy objects.

- Use proper lifting techniques; keeping back straight and lift with arms and legs; keep load near body; avoid reaching.
- b. Do not attempting to lift anything that weighs more than 60 pounds.
- c. Use mechanical equipment such as a cart to carry / lift large, heavy or awkward loads.

4) Slips, trips and falls.

- a. Scan area prior to start of work.
- b. Group all equipment and waste in one designated area.
- c. Return tools not in use to storage.

5) Pinch points on drum and well covers.

a. Personnel will wear leather gloves when working with well and drum covers.

6) Broken Glassware

- a. Personnel will use bubble wrap and blue ice when transporting samples in glass containers.
- b. Personnel will not overtighten caps on glass bottles.

b) Chemical Hazards

Chemical hazards that could possibly be encountered include Gasoline, BTEX, hydrogen sulfide (H₂S), and methane (CH₄). The nature of this project precludes continuous exposure to any potential contaminant.

Per past anecdotal evidence, monitoring well (MW) 30 occasionly has contained small amounts of hydrogen sulfide gas. In addition, during installation, well (W) 2 contained methane gas exceeding the lower explosive limit (LEL). AMEC will conduct air monitoring using a photoionization detector (PID) during drilling and sampling.

1) Personal Injury from chemical contact / exposure / inhalation.

- a. Inspect soil cuttings before handling with PID.
- b. AMEC personnel will place themselves upwind during drilling.

c) Biological Hazards

The project site is a flat graded parking lot which eliminates biological hazards.





page 5

Project Number: 0-915-15716-D

Site Safety Plan: Updated 02.10.10

Project Name: ExxonMobil / ADC Property, Ecology Site ID 2728, Everett, WA

TRAINING

All AMEC personnel will review the site specific Heath and Safety plan before accessing the site. Personnel onsite will also have current 40-Hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Certification.

Certificates of HAZWOPER completion will be maintained at the Bothell office and will be available to regulatory personnel upon request. All Personnel shall carry current 40-hour HAZWOPER training cards or appropriate paperwork while working onsite. The SSC / HSC shall be first aid and CPR trained.

In addition all site personnel must have completed the 8 hour ExxonMobil LPS Training prior to undertaking any field work.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

AMEC will wear Level D PPE which consists of steel-toed, chemical resistant rubber boots, inner glove of PVC or latex, outer gloves of Nitrile or equivalent, safety glasses, Tyvek coveralls, and a hard hat. During construction activities, minimal PPE hearing protection will consist of soft foam ear-bud style plugs.

MEDICAL SURVEILLANCE

Evidence of a current physical examination in the form of a letter from an examining physician will be maintained at the Bothell office and will be available to regulatory personnel upon request.

Air Monitoring

Air monitoring wil be conducted during drilling and soil sampling activities. AMEC will conduct initial air monitoring using a photoionization detector (PID). PID utilizes ultaviolet light to ionize gas molecules and is commonly employed in the detection of volatile organic compounds (VOCs). AMEC will ensure that the concentrations of VOCs are less than 5 parts per million (ppm) in breathing zone prior to proceeding with sampling. Each well will be continuously monitored during sampling. The PID will alarm if VOC concentrations exceed the levels required for breathing.

AMEC will calibrate the PID both pre and post site visits using Isobutylene calibration gas with compatible regulator.

Decontamination

Disposable PPE will be stored in a secured 55-gallon drum onsite. A certified waste transporter and disposal company will contacted to transport the drum for disposal in accordance with local, State, and Federal regulations at an offsite facility.

Site Control

AMEC personnel will be provided with a site map and be required to review the Health and Safety plan prior to entry into the site. A copy of this HASP shall be on hand at all times with emergency contact numbers and directions to the nearest medical facilities easily accessible. When necessary, cones, caution tape or a suitable alternative will be used to deny public access to the work area. Cones will also be used to define an exclusion zone redirecting motorists and pedestrians away from the work area.

In all emergencies AMEC is to document the action taken and notify the HSC. Project Manager and client official of the event and subsequent response.





In the Event of an Injury

If an injury is life-threatening, follow steps 1 though 8 below. If the injury is not life threatening, perform necessary first aid and consider the need for decontamination prior to transport. The SSC shall be first aid and CPR trained.

- 1) Perform first aid necessary to determine victim(s) medical status
- 2) Call emergency transport.
- 3) Give specific directions to location of emergency
- 4) Give phone from which you are calling;
- 5) Tell emergency services what happened. Inform that victim(s) may be wearing contaminated clothing.
- 6) Inform emergency services how many persons need help.
- 7) Inform emergency services what is being done for the victim(s)
- 8) Stay on telephone until told to hang up.

Transport to hospital, if possible.

Work Permits

Copies of the permits will be available onsite during drilling activities. Cascade Drilling will obtain start cards required for drilling from the Washington State Department of Ecology.

Security

No unauthorized persons will be allowed in the work zone. Unauthorized persons are those without appropriate training, without proof of medical surveillance, and those with no business on the site.

Confined Space Entry Procedures

AMEC will not be entering confined spaces at the Site.

Spill Containment Program

The site specific accidental spill / release action plan consists of the following:

- 1) Pick up, isolate, or contain spill;
- 2) Evacuate area, if necessary;
- 3) Contact emergency agencies, if necessary.

Incident Reporting Requirements

In all emergencies, document action taken and notify the HSC / SSC, Project Manager and client officials of occurrences.

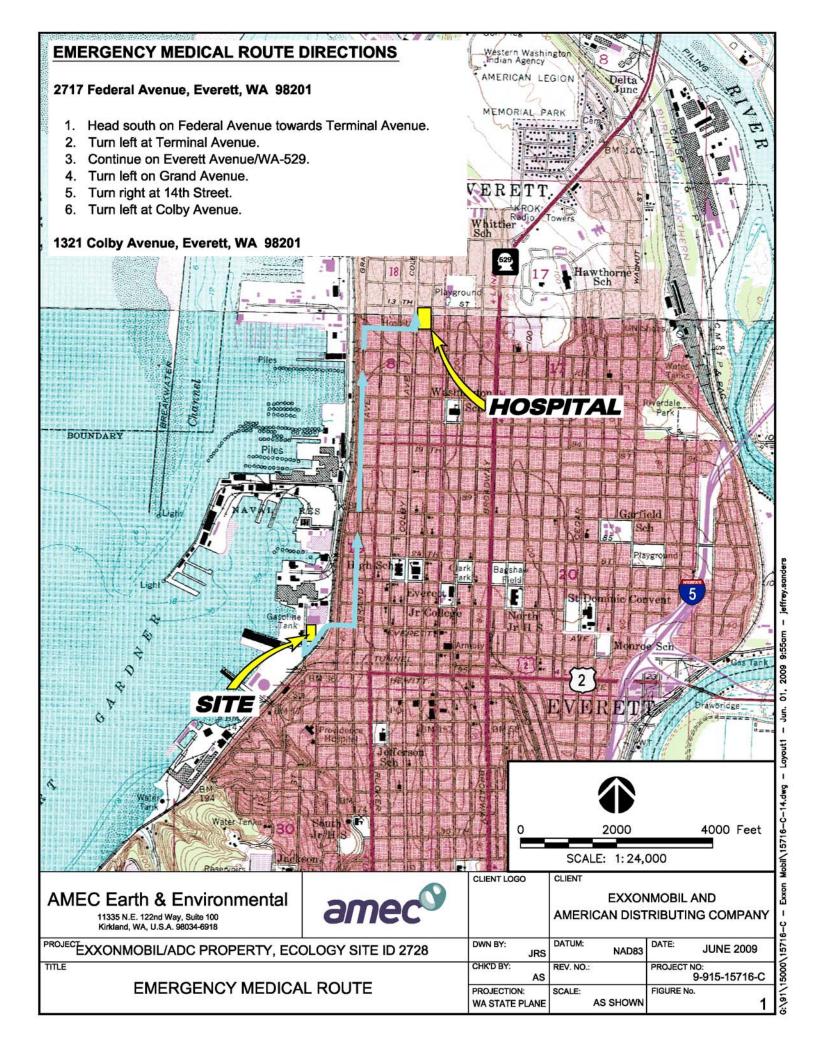
AMEC will report all incidents and Near Loss Incidents (NLI) to the ExxonMobil contact within 24 hours of the occurrence along with a written report and the launching of an accident investigation.





Site Safety Plan: Updated 02.10.10 Project Number: 0-915-15716-D Project Name: ExxonMobil / ADC Property, Ecology Site ID 2728, Everett, WA page 7

Attendance/Sign-In (name, date)	
	_
	_
	_
	_



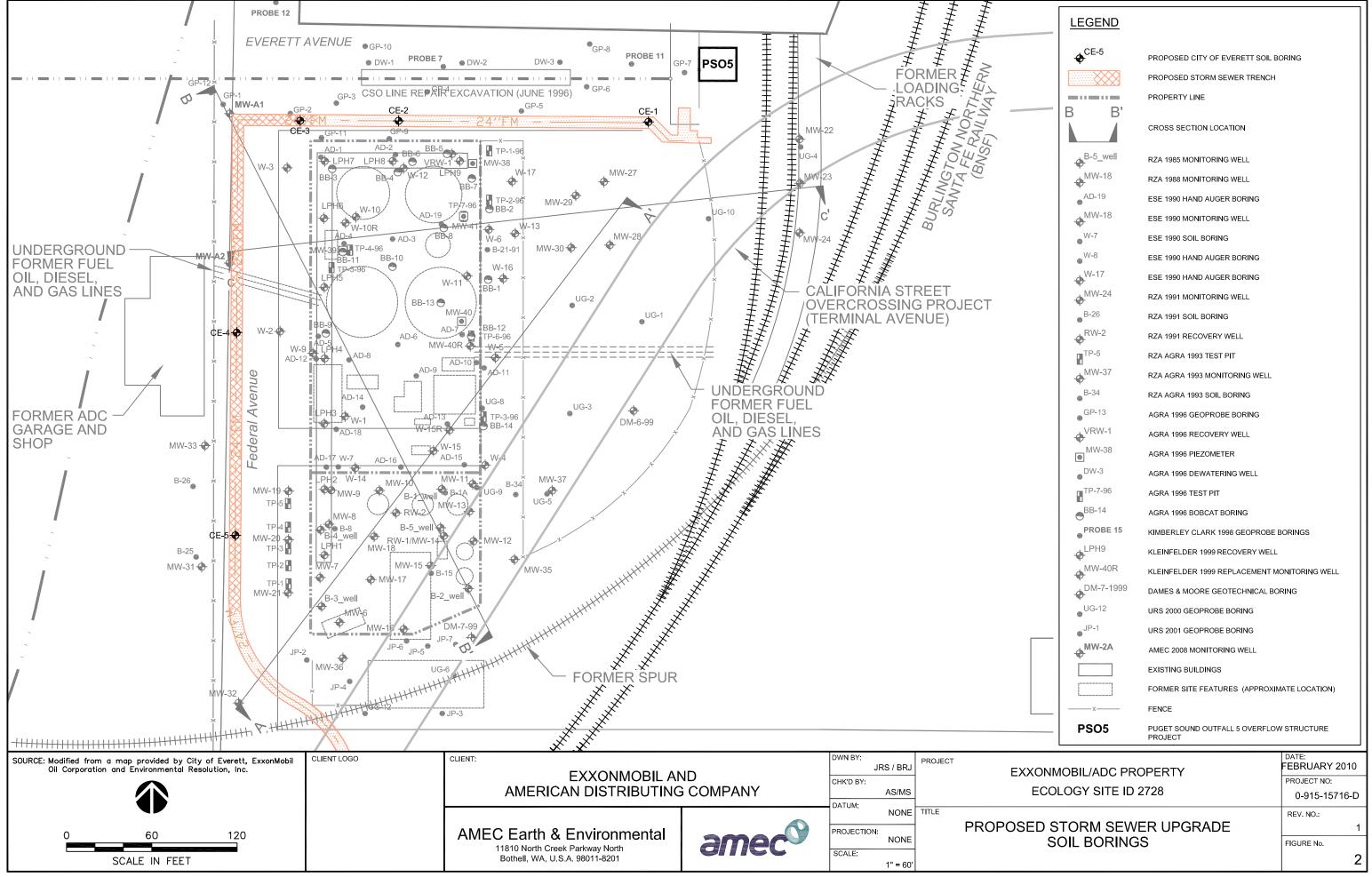
ATTACHMENT A3

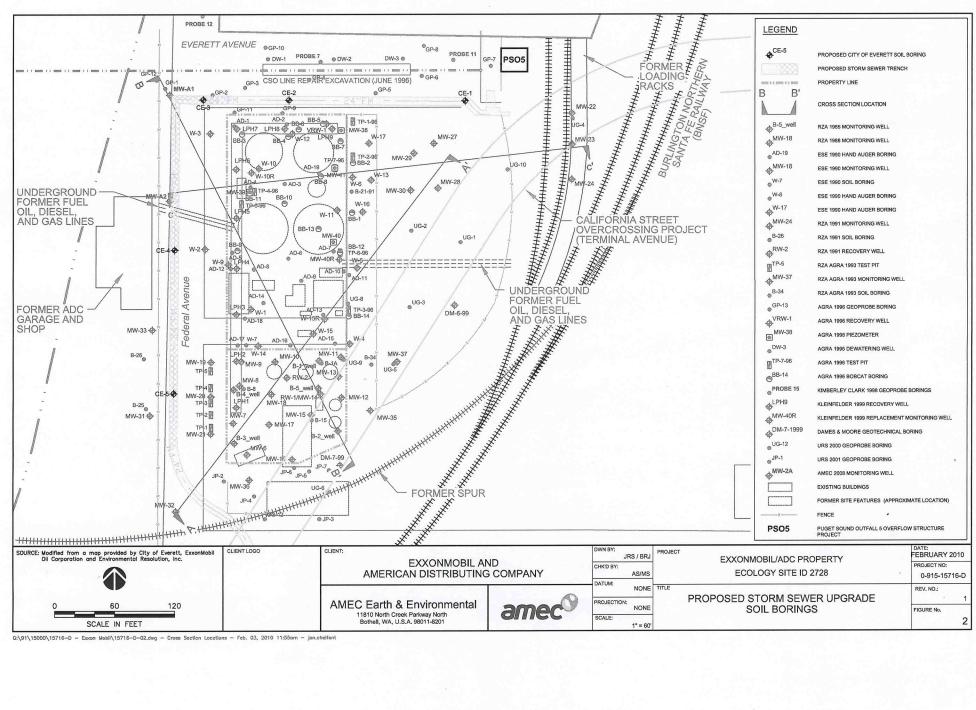
Street Use Permit Documentation

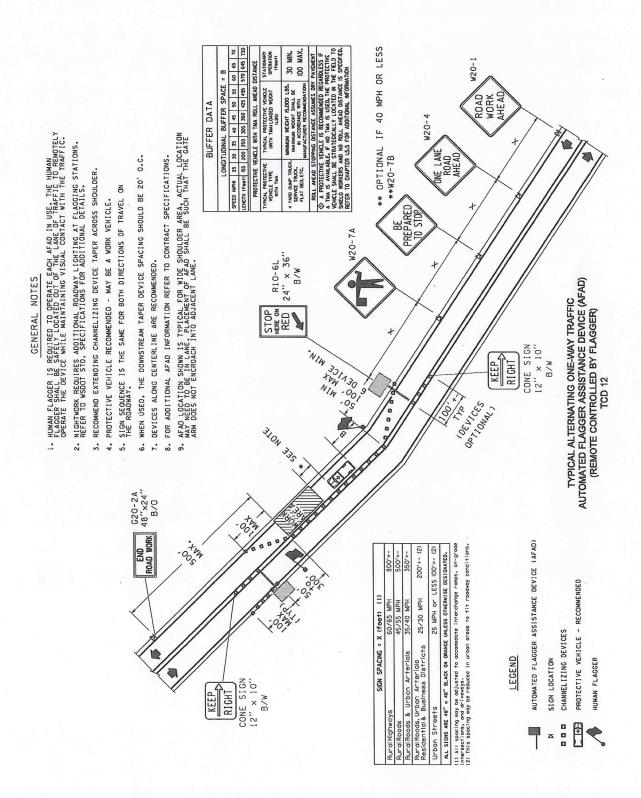


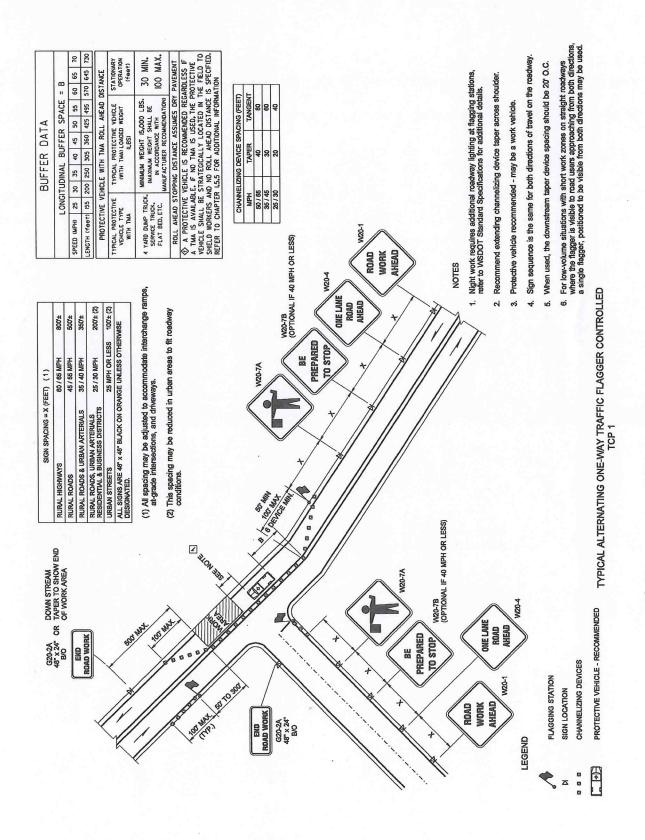
APPLICATION for PUBLIC WORKS PERMIT

PUBLIC WORKS DEPARTMENT 3200 Cedar Street Everett, WA 98201 425 257-8810









ATTACHMENT A4

Field Documentation Forms



AMEC Earth & Environmental, Inc. 11810 North Creek Parkway N Tel (425) 368-1000 Bothell, Washington 98011 (425) 368-1001 Fax

DAILY FIELD REPORT

PROJECT NAME	PROJECT NO. FIELD REPORT NO.								
Mobil/ADC Everett Facility	9915-15716-0								
ADDRESS	DATE	PAGE							
2717/2731 Federal Avenue		OF							
CITY OR COUNTY	TY OR COUNTY PERMIT NO.								
Everett, WA									
CLIENT	AMEC PROJECT MANAGER	R/PHONE NO.							
ExxonMobil									
GENERAL CONTRACTOR	ATIVE/ MOBILE NO.								
SUBCONTRACTOR	WEATHER								
TYPE OF WORK PERFORMED									
EQUIPMENT USED									

COMMENTS	

AMEC (REV. 8/00) AG19342

SOIL BORING LOG



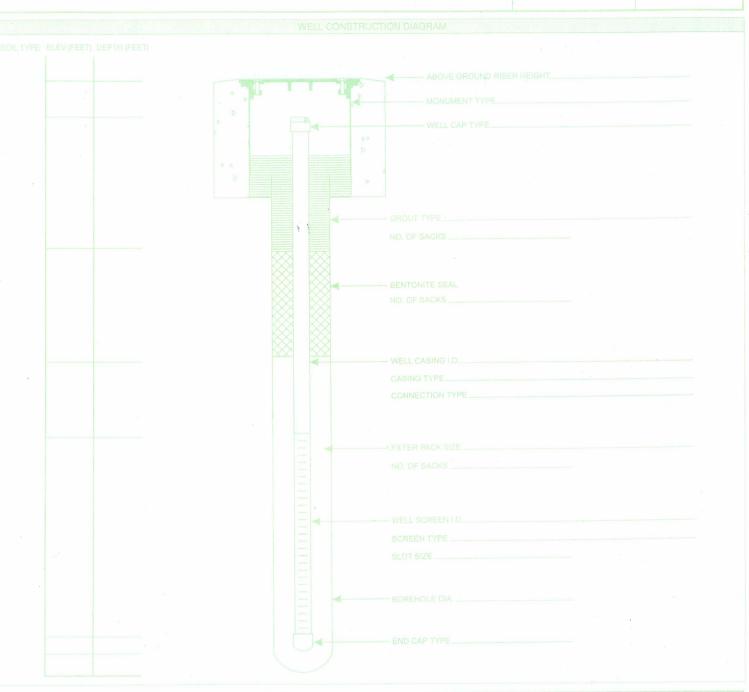
				SOVERY						
							COMMENTS			

COMMENTS



AS-BUILT WELL LOG

			PROJECT NO.	
				DATE COMPLETED
			INSTALLATION TIME	



COMMENTS

11720 North Creek Parkway N Suite 400 Bothell, WA 98011

Chain of Custody Record



phone 425.420.9200 fax 425.420.9210

TestAmerica Laboratories, Inc.

phone (201/201/200 fait (201/201/210																						
Client Contact	Project Ma	Project Manager: Leah Vigoren Site						Site Contact: Leah Vigoren Date:													COC No:	_
AMEC Earth & Environmental, Inc.	Tel/Fax: (206) 838-8470 La						Lab Contact: Carri							nrrier:							of COCs	
600 University Street Suite 1020		Analysis T	urnaround '	Time																	Job No.	
Seattle, WA 98101	Calenda	r(C) or Wo	ork Days (W)																		
(206) 342-1760 Phone	TA	TAT if different from Below																				
(206) 342-1761 FAX		2	weeks																		SDG No.	
Project Name: ExxonMobil/ADC		1	week																			
Site: Everett		2	2 days																			
P O # 9915-15716C			l day			mple																
						d Sa																
	Sample	Sample	Sample		# of	tere																
Sample Identification	Date	Time	Type	Matrix	Cont.	Ξ															Sample Specific Notes:	
						Ħ																
						Н																—
Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaO	H; 6= Othe	r	I.	ı		7																
Possible Hazard Identification						-	Sampl	e Dis	posa	I (A :	fee m	ay b	e ass	esse	d if s	samp	les	are r	etair	ned	longer than 1 month)	_
Non-Hazard Flammable Skin Irritant	Poison I	\Box	Unknown				\Box	Retur	n To	Client	•] _{Dist}	oosal	By La	ab		\square	Arch	ive	For Months	
Special Instructions/QC Requirements & Comments: Send electron	ic data to l	eah.vigoren	@amec.com	1		-																
Relinquished by:	Company:			Date/Ti	ne:		Receive	ed by:						(Comp	any:					Date/Time:	
Relinquished by:	Company:			Date/Ti	ne:	I	Receive	d by:						-	Comp	any:					Date/Time:	
Relinquished by:	Company:			Date/Ti	ne:	I	Receive	d by:						(Comp	any:					Date/Time:	
																					<u> </u>	



Table 749-1 Simplified Terrestrial Ecological Evaluation-Exposure Analysis Procedure

Estimate the area of contiguous (connected) <u>undeveloped land</u> on the site or within 500 area of the site to the nearest 1/2 acre (1/4 acre if the area is less than 0.5 acre).	feet of any
1) From the table below, find the number of points corresponding to the area and enter this number in the field to the right.	
Area (acres) Points 0.25 or less 4 0.5 5 1.0 6 1.5 7 2.0 8 2.5 9 3.0 10 3.5 11 4.0 or more 12	8
2) Is this an <u>industrial</u> or <u>commercial</u> property? If yes, enter a score of 3. If no, enter a score of 1	3
3) ^a Enter a score in the box to the right for the habitat quality of the site, using the following rating system ^b . High=1, Intermediate=2, Low=3	3
4) Is the undeveloped land likely to attract wildlife? If yes, enter a score of 1 in the box to the right. If no, enter a score of 2. ^c	2
5) Are there any of the following soil contaminants present: Chlorinated dioxins/furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, endosulfan, endrin, heptachlor, benzene hexachloride, toxaphene, hexachlorobenzene, pentachlorophenol, pentachlorobenzene? If yes, enter a score of 1 in the box to the right. If no, enter a score of 4.	4
6) Add the numbers in the boxes on lines 2-5 and enter this number in the box to the right. If this number is larger than the number in the box on line 1, the simplified evaluation may be ended.	12

Notes for Table 749-1

Low: Early <u>successional</u> vegetative stands; vegetation predominantly noxious, nonnative, exotic plant species or weeds. Areas severely disturbed by human activity, including intensively cultivated croplands. Areas isolated from other habitat used by wildlife.

^a It is expected that this habitat evaluation will be undertaken by an experienced field biologist. If this is not the case, enter a conservative score of (1) for questions 3 and 4.

^b **Habitat rating system.** Rate the quality of the habitat as high, intermediate or low based on your professional judgment as a field biologist. The following are suggested factors to consider in making this evaluation:

High: Area is ecologically significant for one or more of the following reasons: Late-<u>successional</u> native plant communities present; relatively high species diversity; used by an uncommon or rare species; <u>priority habitat</u> (as defined by the Washington Department of fish and Wildlife); part of a larger area of habitat where size or fragmentation may be important for the retention of some species.

Intermediate: Area does not rate as either high or low.

^c Indicate "yes" if the area attracts wildlife or is likely to do so. Examples: Birds frequently visit the area to feed; evidence of high use b mammals (tracks, scat, etc.); habitat "island" in an industrial area; unusual features of an area that make it important for feeding animals; heavy use during seasonal migrations.

[Area Calculation Aid] [Aerial Photo with Area Designations] [TEE Table 749-1] [Index of Tables]

[Exclusions Main] [TEE Definitions] [Simplified or Site-Specific?] [Simplified Ecological Evaluation] [Site-Specific Ecological Evaluation] [WAC 173-340-7493]

[TEE Home]



Appendix G

ExxonMobil / ADC Property, Ecology Site ID 2728 Work Schedule 2717/2731 Federal Avenue, Everett, Washington

The potential liable parties (PLPs) shall perform the actions identified in this work plan and required under the Agreed Order according to the schedule presented below. Days are calendar days; if due dates fall on a weekend or holiday, deliverables will be submitted to Ecology on the next business day. Note, when Ecology provides comments in red-line strikeout format (i.e., comments made directly within the electronic version of the document), the PLPs may respond to those comments directly within the electronic document.

1.0 REMEDIAL INVESTIGATION FIELD WORK

FFS Field Work — Activities associated with the FFS shall be initiated within 15 days of Ecology's execution of the final Agreed Order. Analytical sampling data collected as part of the FFS shall be provided to Ecology within 45 days after receipt of the validated data. The initial analytical data gathered as part of the FFS shall be compiled for Ecology in the form of a technical memo. The technical memo should discuss the field activities and associated analytical results in addition to preliminary cleanup levels, the extent of contamination (plotted on maps), and any data gaps that need to be filled to define the nature and extent of contamination. Note that the preliminary cleanup levels may be different than the screening levels identified in this work plan based on a better understanding of the conceptual site model for the Site (e.g., it may be shown that contaminants in site soil and/or groundwater may not be impacting surface water).

The data and results associated with the tidal study shall be presented in the form of a technical memo to Ecology within 30 days after completion the tidal study field work. The data and results of the tidal study may be included in the technical memo described in the paragraph above, or as a separate document.

Information provided in the technical memo(s) described above will be used to make a determination with regard to whether additional investigation is required to define the full nature and extent of contamination (see next bullet).

<u>Additional field FFS activities (if needed)</u> – Additional field FFS activities may be required to adequately delineate the nature and extent of contamination at the Site, and/or to conduct pilot testing of a remedial alternative. The scope, schedule, and submittal requirements for additional field FFS activities shall be developed by the PLPs, and shall be submitted to Ecology for review and concurrence.

<u>Environmental Data Submittals</u> — All sampling data (including all historic data) shall be submitted to Ecology in both printed and electronic formats in accordance with Ecology's Toxics Cleanup Program Policy 840 (Data Submittal Requirements) and/or any subsequent procedures specified by Ecology for data submittal. Policy 840 is presented in Exhibit C of this Agreed Order. Historic data, in addition to new data collected as part of the initial or first phase of the FFS, shall be supplied to Ecology in electronic format (i.e., EIM and the PLPs original database format) 45 days after the new data has been validated. Data collected as part of any additional FFS field sampling activities shall also be supplied to Ecology in electronic format (i.e., EIM) 45 days after the data has been validated.

2.0 FFS REPORT SUBMITTAL

<u>First Draft FFS Report</u> – The first draft FFS report shall be due to Ecology 120 calendar days after receipt by the PLPs Project Manager of all final analytical data collected during the FFS. The first draft will then undergo a 30-day review period by Ecology.

<u>Second Draft FFS Report</u> – The second draft FFS report shall address any comments/suggestions submitted by Ecology. The second draft FFS report shall be due 60 days after Ecology provides its comments. The draft final version will undergo a 20-day review period by Ecology.

<u>Draft Final FFS Report</u> – The draft final FFS report shall be due 30 days after receipt of Ecology comments on the second draft FFS report.

<u>Final FFS Report</u> – The final FFS report shall be submitted to Ecology 45 days after Ecology's final review and comments. The final FFS will be included in the public comment period conducted for the Cleanup Action Plan (see 3. below)

3.0 CLEANUP ACTION PLAN (CAP) SUBMITTAL

<u>Draft CAP</u> – The draft CAP shall be submitted to Ecology 60 days after the draft final FFS Report is finalized and ready for public comment. This draft CAP will then undergo a 30-day review period by Ecology.

<u>Draft Final CAP</u> – The draft final CAP shall address comments submitted by Ecology on the draft CAP. This draft final CAP shall be due 60 days after submittal of Ecology comments of the draft CAP. The draft final CAP will undergo a 30-day public comment period under a second Agreed Order or Consent Decree before it becomes a final document. The comment period for the draft final FFS report will be combined with the comment period for the draft CAP/second Agreed Order or Consent Decree.



Appendix H

Applicable or Relevant and Appropriate Requirements (ARARs)

The starting point for ARARs is the MTCA cleanup levels and regulations that address implementation of a cleanup under MTCA (Chapter 173.105D RCW; Chapter 173-340 WAC).

Other potential ARARs may include the following:

- 1. State Water Pollution Control Act (Chapter 90.48 RCW).
- 2. Applicable surface water quality criteria published in the water quality standards for surface waters of the State of Washington, Chapter 173-201A WAC.
- 3. Applicable surface water quality criteria published under Section 304 of the Clean Water Act.
- 4. Applicable surface water quality criteria published under National Toxics Rule (40 C.F.R. Part 131).
- 5. Washington State Hazardous Waste Management Act (Chapter 70.105 RCW, and State Dangerous Waste Regulation (Chapter 173-303).
- 6. Solid Waste Management-Reduction and Recycling (Chapter 70.95 RCW).
- 7. Minimum Standards for Construction and Maintenance of Wells (Chapter 173-160 RCW).
- 8. Washington Clean Air Act (Chapter 70.94 WAC).
- 9. Puget Sound Clean Air Agency Regulations (http://www.pscleanair.org).
- 10. Occupational Safety and Health Act (OSHA), 29 CFR Subpart 1910.120.
- 11. Washington Industrial Safety and Health Act (WISHA).
- 12. Shoreline Management Act (Chapter 90.58 and Chapter 173-14-28 WAC)
- 13. Archaeological and Cultural Resources Act (Chapter 43.53 RCW)

EXHIBIT C

ECOLOGY POLICY 840 – DATA SUBMITTAL REQUIREMENTS



Toxics Cleanup Program Policy

Policy 840

Resource Contact: Policy and Technical Support Staff Effective August 1, 2005

References WAC 173-340-840(5)

Revised September 9, 2005

http://www.ecy.wa.gov/eim/

http://www.ecy.wa.gov/programs/tcp/smu/sedqualfirst.htm

http://www.ecy.wa.gov/biblio/0309043.html

Replaces: Procedure 840

Policy 840: Data Submittal Requirements

Purpose: Contaminated site investigations and cleanups generate a large volume of environmental monitoring data that need to be properly managed to facilitate regulatory decisions and access to this data by site owners, consultants, and the general public. The purpose of this policy is to describe the requirements for submitting environmental monitoring data generated/collected during the investigation and cleanup of contaminated sites under the Model Toxics Control Act (MTCA) and the Sediment Management Standards

Application: This policy applies to Ecology staff, potentially liable parties, prospective purchasers, state and local agencies, and Ecology contractors that investigate or manage the cleanup of contaminated sites

1. Unless Otherwise Specified by Ecology, all Environmental Monitoring Data Generated during Contaminated Site Investigations and Cleanups shall be Required to be Submitted to Ecology in both a Written and Electronic Format.

Environmental monitoring data include biological, chemical, physical, and radiological data generated during site investigations and cleanups under the Model Toxics Control Act Cleanup Regulation (WAC 173-340) and the Sediment Management Standards (WAC 173-204).

Data generated/collected during site investigations and cleanups conducted under an order, agreed order or consent decree, permit, grant, loan, contract, interagency agreement, memorandum of understanding or during an independent remedial action, are considered environmental monitoring data under this policy.

Data generated/collected for non site-specific studies, site hazard assessments that result in no further action and initial site investigations are not considered environmental monitoring data under this policy.

2. Orders, Agreed Orders, Consent Decrees, or Permits Issued After the Effective Date of this Policy Shall Include a Condition that Site-Specific Data be Submitted in Compliance with this Policy.

Reports on such work that do not include documentation that the data have been submitted in compliance with this policy shall be deemed incomplete and a notice of such provided to the

submitter. These reports generally should not be reviewed until that information is provided. The assistant attorney general assigned to the site should be consulted in these situations.

3. Reports on Independent Remedial Actions Submitted for Review After October 1, 2005, Under Ecology's Voluntary Cleanup Program Shall Not be Reviewed Until the Data Have Been Submitted in Compliance with this Policy.

Such reports shall be deemed incomplete, and a notice to this effect provided to the submitter

4. Grants, Contracts, Interagency Agreements or Memoranda of Understanding Issued After the Effective Date of this Policy Shall Include a Condition that Site-Specific Data be Submitted in Compliance with this Policy.

Reports on such work shall not be accepted as complete until the data have been submitted in compliance with this policy. If a payment or transfer of funds is involved in the transaction, the relevant payment or transfer shall be withheld until this requirement has been met.

Example language to include in these documents is attached in Appendix A.

5. Data Generated During Upland Investigations and Cleanups Shall be Submitted Electronically Using Ecology's Environmental Information Management System (EIM).

EIM is Ecology's main database for environmental monitoring data. Proper submission of data through this system meets the requirement of submitting such data in an electronic format. Electronic data shall be submitted to Ecology simultaneously with the accompanying printed report.

Additional information on EIM, including instructions for data submittal, can be found on Ecology's EIM web site at http://www.ecy.wa.gov/eim/. TCP's EIM Coordinator also is available for technical assistance to site managers and consultants using EIM.

6. Data Submitted Electronically Using EIM Shall be Checked by the Toxics Cleanup Program's EIM Coordinator Prior to Loading the Data into EIM.

Normally, notice that data have been submitted through EIM will come to TCP's EIM Coordinator. Upon receipt of such a notice the EIM Coordinator should notify the site manager. Similarly, if the Ecology site manager receives a notice of an EIM submittal, they should notify TCP's EIM Coordinator. Upon receipt of the data, TCP's EIM Coordinator reviews the submittal for quality control and officially loads the data into the system.

7. Data Generated During Sediment Investigations and Cleanups shall be Submitted Electronically Using Ecology's Sediment Quality Information System (SEDQUAL).

SEDQUAL is Ecology's data management system for sediment-related data. Proper submission of data through this system meets the requirement of submitting such data in an electronic format. Electronic data shall be submitted to Ecology simultaneously with the accompanying printed report.

8. Sediment Sampling Data Shall be Submitted to Ecology Using the SEDQUAL Data Entry Templates.

At a minimum, the following SEDOUAL data entry templates must be completed:

- 1 **Reference & Bibliography:** Describes lab reports and publications that relate to the data being entered;
- 2. Survey: Sample number;
- 3. Station: Specifies geographic location of the sediment sample. Sample latitude/longitude coordinates must be entered using the North American Datum of 1983 in U.S. Survey feet (NAD 83, U.S. feet);
- 4. Sample: Describes sample characteristics such as depth; and
- 5. Sediment Chemistry: Reports chemical concentration data in dry weight units.

The following additional templates must also be completed where these measurements/observations have been made:

- 1 Bioassay: Bioassay test results;
- 2. Bioassay Control: Bioassay control test results;
- 3 Benthic Infauna: Species abundance & diversity;
- 4 Tissue: Describes the organism collected;
- 5 Bioaccumulation: Reports tissue chemical concentrations; and
- 6. **Histopathology:** Reports tissue pathology such as tumors or lesions.

9. Electronic Data Formats Shall be Verified to be Compatible with SEDQUAL Prior to Submittal.

Because SEDQUAL uses ASCII protocol and comma delimited text files, data format verification shall be conducted prior to submittal to Ecology. Data shall be verified by downloading the SEDQUAL database, importing the data into the database, correcting errors, and then exporting the corrected templates.

For additional information on sediment sampling and analysis plan requirements, see Ecology publication 03-09-043 "Sediment Sampling and Analysis Plan Appendix", April, 2003. A copy of this document can be obtained from Ecology's publication office or downloaded from the following web site: http://www.ecy.wa.gov/biblio/0309043.html

Additional information on SEDQUAL can be found at:

http://www.ecy.wa.gov/programs/tcp/smu/sedqualfirst.htm. ICP's SEDQUAL Coordinator is also available for technical assistance to site managers and consultants using SEDQUAL.

10. Sediment Sampling Data Shall Also be Submitted to Ecology in a Printed Report.

Printed reports shall present the data in both dry weight and total organic carbon normalized units in data tables that compare the results to applicable state regulatory criteria.

11. Data Submitted Electronically Using SEDQUAL Shall be Checked by the Toxics Cleanup Program's SEDQUAL Coordinator Prior to Loading the Data into SEDQUAL.

Normally, SEDQUAL data submittals will come to TCP's SEDQUAL Coordinator. Upon receipt of a submittal, the Coordinator should notify the site manager. Similarly, if the Ecology site manager receives a SEDQUAL submittal, they should notify TCP's SEDQUAL Coordinator. Upon receipt of the data, TCP's SEDQUAL Coordinator reviews the submittal for quality control and officially loads the data into the system.

Approved

James J. Pendowski, Program Manager

Toxics Cleanup Program

Policy Disclaimer: This policy is intended solely for the guidance of Ecology staff. It is not intended, and cannot be relied on, to create rights, substantive or procedural, enforceable by any party in litigation with the state of Washington. Ecology may act at variance with this policy depending on site-specific circumstances, or modify or withdraw this policy at any time

APPENDIX A: MODEL GRANT AND PERMIT CONDITION

The following condition is to be inserted in permits, grants, loans, contracts, interagency agreements, memorandum of understandings where site-specific environmental monitoring data is expected to be generated:

All sampling data shall be submitted to Ecology in both printed and electronic formats in accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840: Data Submittal Requirements. Electronic submittal of data is not required for site hazard assessments that result in no further action and initial site investigations. (FOR GRANTS & CONTRACTS ADD: Failure to properly submit sampling data will result in Ecology withholding payment and could jeopardize future grant funding.)

Site Cleanup:

ExxonMobil ADC Site

2717 and 2731 Federal Avenue Everett, Washington

PUBLIC PARTICIPATION PLAN

Prepared by:

Washington State Department of Ecology



November 2008

This plan is for you!

This Public Participation Plan is prepared for the ExxonMobil ADC Site cleanup as part of the requirement of the Model Toxics Control Act (MTCA). The plan provides information about MTCA cleanup actions and requirements for public involvement, and identifies how Ecology, and ExxonMobil Oil Corporation and American Distributing Company (ADC) support public involvement throughout the cleanup. The plan is intended to encourage coordinated and effective public involvement tailored to the community's needs at the ExxonMobil ADC Site.

For additional copies of this document, please contact:

Washington State Department of Ecology Andy Kallus, Site Manager Toxics Cleanup Program PO Box 47600 Olympia, WA 98504-7600 (360) 407-7259 Email: akal461@ecy.wa.gov

If you need this publication in an alternate format, please call the Toxics Cleanup Program at (360) 407-7170. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call (877) 833-6341 (TTY).

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1.0: Introduction and Overview of the Public Participation Plan

This Public Participation Plan explains how you can become involved in improving the health of your community. It describes public participation opportunities that will be conducted during cleanup of a site on the Everett waterfront - the ExxonMobil ADC Site (Site). These opportunities are part of a cooperative agreement between the Washington State Department of Ecology (Ecology) and some of the owners and operators of the Site, which include Exxon Mobil Oil Corporation and American Distributing Company (ADC). These two companies are Potentially Liable Persons, or PLPs at the Site. The current agreement, called an Agreed Order (Order), is a legal document in which the PLPs and Ecology agree to decide on cleanup actions for the ExxonMobil ADC Site. ExxonMobil ADC is generally located at 2717 and 2713 Federal Avenue, near Port Gardner Bay, Everett, Washington.

Cleanup actions and the public participation process that helps guide them are established in Washington's Model Toxics Control Act (MTCA). Under MTCA, Ecology is responsible for providing timely information and meaningful chances for the public to learn about and comment on important cleanup decisions before they are made. The goals of the public participation process are:

- To promote understanding of the cleanup process so that the public has the necessary information to participate.
- To encourage involvement through a variety of public participation opportunities.

This Public Participation Plan provides a framework for open dialogue about the cleanup among community members, Ecology, cleanup site owners, and other interested parties. It outlines basic MTCA requirements for community involvement activities that will help ensure that this exchange of information takes place during the investigation and cleanup, which include:

- Notifying the public about available reports and studies about the site.
- Notifying the public about review and comment opportunities during specific phases of the cleanup investigation.
- Providing appropriate public participation opportunities such as fact sheets to learn about cleanup documents, and if community interest exists, holding meetings to solicit input and identify community concerns.

¹ The Model Toxics Control Act (MTCA) is the hazardous waste cleanup law for the State of Washington. The full text of the law can be found in Revised Code of Washington (RCW), Chapter 70.105D. The legal requirements and criteria for public notice and participation during MTCA cleanup investigations can be found in Washington Administrative Code (WAC), Section 173-340-600.

• Considering public comments received during public comment periods.

In addition to these basic requirements, the plan may include additional site-specific activities to meet the needs of your community. Based upon the type of the proposed cleanup action, the level of public concern, and the risks posed by the site, Ecology may decide that additional public involvement opportunities are appropriate.

These opportunities form the basis for the public participation process. The intent of this plan is to:

- Provide complete and current information to all interested parties.
- Let you know when there are opportunities to provide input.
- Listen to concerns.
- Address those concerns.

Part of the Puget Sound Initiative

ExxonMobil ADC is one of several sites in the Everett area and is part of a larger cleanup effort called the Puget Sound Initiative (PSI). Governor Chris Gregoire and the Washington State Legislature authorized the PSI as a regional approach to protect and restore Puget Sound. The PSI includes cleaning up 50-60 contaminated sites within one-half mile of the Sound. These sites are grouped in several bays around the Sound for "baywide" cleanup efforts. As other sites in the Everett baywide area move forward into investigation and cleanup, information about them will be provided to the community as well as to interested people and groups.

Roles and Responsibilities

Ecology will lead public involvement activities, with support from the PLPs. Ecology maintains overall responsibility and approval authority for the activities outlined in this plan. The PLPs are responsible for cleanup at this Site. Ecology will ultimately oversee all cleanup activities, and ensure that contamination on this Site is cleaned up to concentrations that are established in state regulations and that protect human health and the environment.

Organization of this Public Participation Plan

The sections that follow in this plan provide:

• Section 2: Background information about the ExxonMobil ADC Site.

- Section 3: An overview of the local community that this plan is intended to engage.
- Section 4: Public involvement opportunities in this cleanup.

This Public Participation Plan addresses current conditions at the Site, but it is intended to be a dynamic working document that will be reviewed at each phase of the cleanup, and updated as needed. Ecology and the PLPs urge the public to become involved in the cleanup process.

2.0: Site Background

Site Description and Location

The ExxonMobil ADC Site is generally located at 2717 and 2731 Federal Way, in Everett, Snohomish County, Washington (see Figures 1 and 2). The Site is entirely upland and is about 0.86 acre in size. The ExxonMobil and ADC properties are bounded by Terminal Avenue and City of Everett property to the south; Kimberly-Clark Worldwide, Inc. property to the north; City of Everett right of way and Burlington Northern Santa Fe Railway property to the east; and Federal Avenue and Port of Everett property to the west. Port Gardner Bay is to the west of the Port property. The Site is currently an asphalt paved parking lot.

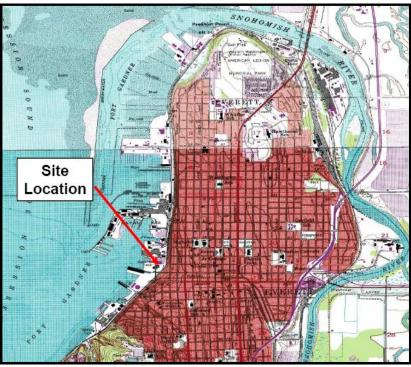


Figure 1: The ExxonMobil ADC Site, shown in the above map with an arrow, is generally located at 2717 and 2731 Federal Avenue, near Port Gardner Bay, Everett, WA. (Photo Source: USGS 7.5 Minute Quadrangle Maps (Everett and Marysville Quadrangle Maps; Photo Revised – 1968 and 1973)



Figure 2: A current view of the ExxonMobil ADC Site. (Photo Source: October 2008 Snohomish County Online Property Information)

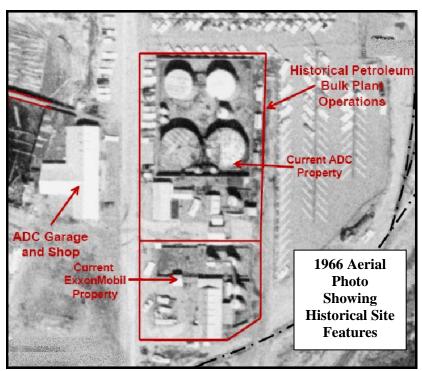


Figure 3: A historical view of the ExxonMobil ADC Site. (Photo Source: Washington State Department of Transportation Aerial Photograph, July 29, 1966.)

The City of Everett Comprehensive Plan land use map² indicates that the Site is zoned M-2 (Heavy Manufacturing). Zoning to the east is B-3 (Central Business District).

General Site History and Contaminants

The Site was used to receive, store and distribute petroleum fuel. The predecessors of ExxonMobil Oil Corporation owned the entire site from 1927 to 1974. Mobil Oil continued to operate the southern portion of the Site until 1987, but sold the northern portion to A.P. Miller for use by American Distributing Company (ADC). ADC conducted bulk petroleum operations on the northern portion from 1974 to 1990. All structures and pipes were removed between 1998 and 2000 from both portions of the Site.

Petroleum contamination has been found in Site soil and groundwater due to past operations. It also flowed along the City of Everett's combined sewer overflow (CSO) line into Port Gardner Bay. Studies and interim cleanup actions have been performed since 1985, and the pathway to the bay was removed (see 1996 Order below). Investigation results have found the following contaminants above state cleanup levels in soil and/or groundwater at the Site: total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), lead, benzene, ethylbenzene, and xylene.

Site cleanup has been addressed under two prior Orders as discussed below.

1996 Order – In 1996, Ecology entered into an emergency Order with Mobil Oil, ADC, and A.P. Miller requiring the cleanup and elimination and/or containment of petroleum releases at and near the City of Everett's CSO discharge line into Port Gardner Bay. The releases were related to a severely corroded and collapsed section of the CSO line approximately 400 feet from Port Gardner Bay. Petroleum releases from the Site around the collapsed CSO section contributed to the discharge to Port Gardner Bay. Mobil Oil, ADC, and A.P. Miller agreed to perform corrective action work, including replacing the collapsed CSO section, sliplining another CSO section (to prevent leakage of petroleum through the CSO), and cleanup of rip rap, sheetpile seawall, and pilings and docks near the discharge to Port Gardner Bay. As a result of these actions, direct discharge of petroleum into Port Gardner via the CSO was eliminated. The Order also required pilot testing of petroleum recovery technologies and characterization of the areal and vertical distribution and concentration of the free-phase waste petroleum liquid and groundwater contamination. As a result of this Order, Ecology acknowledged that the interim containment measures and CSO repair and cleanup were satisfactorily completed with no evidence of on-going releases of heavy oil characteristic of the Mobil and ADC release. About 23,000 gallons of petroleum contamination was recovered within the vicinity of the CSO line.

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² Planning and Community Development, City of Everett, WA http://www.everettwa.org/Zoning WEB 2008.pdf (Accessed November 4, 2008)

• 1998 Order – In 1998, Ecology, Mobil Oil, ADC, and A.P. Miller entered into an Order which required the preparation of a Remedial Investigation/Focused Feasibility Study Report (RI/FFS Report), an Interim Action Work Plan, and the subsequent implementation and performance of the work described in the Interim Action Work Plan. The following interim remedial actions were performed (between 1998 and 2000) under the 1998 Order: demolition of site structures, monitoring well abandonment, construction of an interceptor trench (for petroleum recovery), and construction of a site cover to minimize infiltration of surface water into subsurface soil.

As a result of the RI/FFS and subsequent interim remedial actions conducted at the Site under the 1998 Order, the ExxonMobil and A.P. Miller properties were converted into a parking lot for Kimberly-Clark employees. This redevelopment option was selected to allow for possible future remediation activities at the Site. As a continued requirement under the 1998 Order, groundwater monitoring and petroleum recovery activities are ongoing at the Site. More study is needed to fully characterize the contamination at the ExxonMobil ADC Site.

The Cleanup Process

Washington State's cleanup process and key opportunities for you to provide input are outlined in Figure 3. The general cleanup process includes the following steps:

- Remedial Investigation (RI) investigates the site for types, locations, and amounts of contaminants.
- Feasibility Study (FS) identifies cleanup options for those contaminants.
- Cleanup Action Plan (CAP) selects the preferred cleanup option and explains how cleanup will be conducted.

Each of these steps are generally documented in reports and plans that will be available for public review. Public comment periods of at least 30 calendar days are usually conducted for the following documents:

- Draft RI report
- Draft FS report
- Draft CAP

These cleanup steps and documents are described in greater detail in the following subsections.

Interim Actions

Interim actions may be conducted during the cleanup if required by Ecology. An interim action partially addresses the cleanup of a site, and may be required if:

- It is technically necessary to reduce a significant threat to human health or the environment.
- It corrects a problem that may become substantially worse or cost substantially more to fix if delayed.
- It is needed to complete another cleanup activity, such as design of a cleanup plan.

Future interim actions are not currently anticipated on the ExxonMobil ADC Site.

Remedial Investigation/Feasibility Study Report

The PLPs have agreed to conduct a supplemental RI/FS on the Site. The RI determines which contaminants are on the Site, where they are located, and whether there is a significant threat to human health or the environment. The draft RI report provides baseline data about environmental conditions that will be used to develop cleanup options. The FS and report then identify and evaluate cleanup options, in preparation for the next step in the process. Since studies and some cleanup have been conducted on this Site since 1985, additional studies will be more specific; therefore, the RI/FS will be referred to as a Focused Feasibility Study (FFS).

The RI and FS processes typically include several phases:

- Scoping
- Site characterization
- Development and screening of cleanup alternatives
- Treatability investigations (if necessary to support decisions)
- Detailed analysis

The RI and FS reports are expected to be combined into a draft ExxonMobil ADC Site FFS report. The draft report is anticipated to be completed sometime in 2010 and will be made available for public review and comment.

Cleanup Action Plan

The PLPs and Ecology have agreed to develop a draft CAP for the Site. After public comment on the draft FFS report, a preferred cleanup alternative will be selected. The draft CAP explains the cleanup standards that will be applied at the Site, selects the preferred cleanup alternative(s), and outlines the work to be performed during the actual Site remediation. The CAP may also evaluate the completeness and effectiveness of any interim actions that were performed on the Site. The draft CAP will be available for public review and comment. Once public comments are reviewed and any changes are

made, Ecology provides final approval and Site cleanup can begin. Cleanup is anticipated to be completed sometime in 2011.

3.0: Community Profile

Community Profile

Everett is Snohomish County's largest city and the sixth largest city in the State of Washington. The current population of Everett is approximately 98,000³ situated within 47.7 square miles. Located on Port Gardner Bay, Everett hosts the West Coast's largest marina, U.S. Navy Homeport Naval Station Everett, and The Boeing Company's assembly plant. The city's 2006 labor workforce was more than 80,000, employed predominantly in technology, aerospace, and service-based industries.⁴

Key Community Concerns

An important part of the Public Participation Plan is to identify key community concerns for each cleanup site. Many factors are likely to raise community questions, such as the amount of contamination, how the contamination will be cleaned up, or future use of the Site. Community concerns often change over time, as new information is learned and questions are answered. Identifying site-specific community concerns at each stage of the cleanup process is helpful to ensure that they are adequately addressed. On-going key community concerns will be identified for the ExxonMobil ADC Site through public comments and other opportunities as detailed in Section 4.

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³ US Census Bureau, City & Towns Estimates Data for July 1, 2006. http://www.census.gov/popest/estimates.php (Accessed September 12, 2007)

⁴ City of Everett. http://www.everettwa.org/default.aspx?ID=314 (Accessed September 12, 2007)

4.0: Public Participation Opportunities

Ecology and the PLPs invite you to share your comments and participate in the cleanup in your community. As we work to meet our goals, we will evaluate whether this public participation process is successful. This section describes the public participation opportunities for this Site.

Measuring Success

We want this public participation process to succeed. Success can be measured, at least in part, in the following ways:

- Number of written comments submitted that reflect understanding of the cleanup process and the site.
- Direct "in-person" feedback about the site cleanup or public participation processes, if public meetings are held.
- Periodic updates to this plan to reflect community concerns and responses.

If we are successful, this process will increase:

- Community awareness about plans for cleanup and opportunities for public involvement.
- Public participation throughout the cleanup.
- Community understanding regarding how their input will be considered in the decision-making process.

Activities and Information Sources

Ecology Contacts

Ecology is the lead contact for questions about the cleanup in your community. The Ecology staff person identified in this section is familiar with the cleanup process and activities at the Site. For more information about public involvement or the technical aspects of the cleanup, please contact:

Andy Kallus Ecology Site Manager WA State Dept. of Ecology Toxics Cleanup Program P.O. Box 47600 Olympia, WA 98504-7600 Phone: (360) 407-7259 E-mail: akal461@ecy.wa.gov

Ecology's Webpage

Ecology has created a webpage to provide convenient access to information. Documents such as the Agreed Order, draft reports, and cleanup plans, are posted as they are issued during the investigation and cleanup process. Visitors to the webpage can find out about public comment periods and meetings; download, print, and read information; and submit comments via e- mail. The webpage also provides links to detailed information about the MTCA cleanup process. The ExxonMobil ADC Site webpage is available at the following address:

http://www.ecy.wa.gov/programs/tcp/sites/ExxonMobilEverett/exxonBlkPlant_hp.htm

Information Centers/Document Repositories

The most comprehensive source of information about the ExxonMobil ADC Site is the information center, or document repository. Two repositories provide access to the complete list of site-related documents. All ExxonMobil ADC investigation and cleanup activity reports will be kept in print at those two locations and will be available for your review. They can be requested on compact disk (CD) as well. Document repositories are updated before public comment periods to include the relevant documents for review. Documents remain at the repositories throughout the investigation and cleanup. For this Site, the document repositories and their hours are:

• Everett Public Library

2702 Hoyt Ave.

Phone: (425) 257-8010

Hours: Mon.-Wed. 10 a.m.-9 p.m.,

Thurs.-Sat. 10 a.m.-6 p.m., Sun. 1-5 p.m.

• WA Department of Ecology Headquarters

300 Desmond Drive SE

Lacey, WA 98503

By appointment. Please contact Carol Dorn at

(360) 407-7224 or cesg461@ecy.wa.gov.

Look for document covers such as the illustration on the right.

Site Investigation Documents for Public Review CLEANUP SITE: EXXONMOBIL ADD SITE EVERETT, WA These documents are also available on the Department of Ecology's website: http://www.eg.wa.gov/programs/htp/sites/EconoMobilEverett/exanclik Plaget Sound Invitative: Noting the guil of the Alley, WASHINGTON STATE Department of Ecology Puget Sound Programs of Ecology WASHINGTON STATE Department of Ecology

Public Comment Periods

Public comment periods provide opportunities for you to review and comment on major documents, such as the Agreed Order, draft Public Participation Plan, and the draft RI/FS report. The typical public comment period is 30 calendar days.

Notice of Public Comment Periods

Notices for each public comment period will be provided by local newspaper and by mail. These notices indicate the timeframe and subject of the comment period, and explain how you can submit your comments. For the ExxonMobil ADC Site, newspaper notices will be posted in The Daily Herald.

Notices are also sent by regular mail to the local community and interested parties. The community typically includes all residential and business addresses within one-quarter mile of the site, as well as potentially interested parties such as public health entities, environmental groups, and business associations.

Fact Sheets

One common format for public comment notification is the fact sheet. Like the newspaper notice, fact sheets explain the timeframe and purpose of the comment period, but also provide background and a summary of the document under review. A fact sheet has been prepared for the ExxonMobil ADC Site explaining the Agreed Order and this Public Participation Plan (See Appendix A). Future fact sheets will be prepared at key milestones in the cleanup process.

MTCA Site Register

Ecology produces an electronic newsletter called the MTCA Site Register. This semimonthly publication provides updates of the cleanup activities occurring throughout the state, including public meeting dates, public comment periods, and cleanup-related reports. Individuals who would like to receive the MTCA Site Register can sign up three ways:

- o Call (360) 407-6069
- o Send an email request to ltho461@ecy.wa.gov or
- Register on-line at http://www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html

Mailing Lists

Ecology maintains both an e-mail and regular mail distribution list throughout the cleanup process. The list is created from carrier route delineations for addresses within one-quarter mile of the site, potentially interested parties, public meeting sign-in sheets, and requests made in person, or by regular mail or e-email. You may request to be on the mailing list by contacting the Ecology staff person listed earlier in this section.

Optional Public Meetings

A public meeting will be held during a comment period if requested by ten or more people, or if Ecology decides it would be useful. Public meetings provide additional opportunity to learn about the investigation or cleanup, and to enhance informed comment. If you are interested in a public meeting about the ExxonMobil ADC Site, please contact the Ecology staff person listed earlier in this section.

Submitting Comments

You may submit comments by regular mail or e-mail during public comment periods to the Ecology project manager listed earlier in this section.

Response to Comments

Ecology will review all comments submitted during public comment periods, and will modify documents as necessary. You will receive notice by regular mail or e-mail that Ecology has received your comments, along with an explanation about how the comments were addressed.

Other

Ecology and the PLPs are committed to the public participation process and will consider additional means for delivering information and receiving comments, including combining public comment periods for other actions (such as those associated with the State Environmental Policy Act).

Public Participation Grants

You may be eligible to apply for a Public Participation Grant from Ecology to provide additional public participation activities. Those additional activities will not reduce the scope of the activities defined by this plan. Activities conducted under this plan would coordinate with the additional activities defined under the grant.

Remedial Investigation Work Plan Interim Actions (Can occur at any time up to Cleanup Action Plan) Field Work Report Remedial Investigation and **KEY PUBLIC COMMENT PERIOD Feasibility Study Report** Public notice posted on website and newspaper and mailed to residents Opportunity to comment (at least 30 days); may be combined with comment period on draft CAP Comments response letter Cleanup Action Plan **KEY PUBLIC COMMENT PERIOD** Public notice posted on website and newspaper and mailed to residents Opportunity to comment (at least 30 days); may be combined with comment period on RI/FS Comments response letter **Cleanup Implementation Definitions:** Compliance Monitoring Plan **Interim Action:** An action that only partially Operation and Maintenance Plan Institutional Control Plan addresses the cleanup of the site. Remedial Investigation: Provides information on the extent and magnitude of contamination at a site. Feasibility Study: Provides identification and analysis of site cleanup alternatives. Cleanup Action Plan: A document that selects **Cleanup Action Report** the cleanup action and specifies cleanup standards and other requirements for a particular site.

Figure 3: Washington State Cleanup Process

Glossary

Cleanup: The implementation of a cleanup action or interim action.

Cleanup Action: Any remedial action except interim actions, taken at a site to eliminate, render less toxic, stabilize, contain, immobilize, isolate, treat, destroy, or remove a hazardous substance that complies with MTCA cleanup requirements, including but not limited to: complying with cleanup standards, utilizing permanent solutions to the maximum extent practicable, and including adequate monitoring to ensure the effectiveness of the cleanup action.

Cleanup Action Plan: A document that selects the cleanup action and specifies cleanup standards and other requirements for a particular site. The cleanup action plan, which follows the remedial investigation/feasibility study report, is subject to a public comment period. After completion of a comment period on the cleanup action plan, Ecology finalizes the cleanup action plan.

Cleanup Level: The concentration (or amount) of a hazardous substance in soil, water, air, or sediment that protects human health and the environment under specified exposure conditions. Cleanup levels are part of a uniform standard established in state regulations, such as MTCA.

Cleanup Process: The process for identifying, investigating, and cleaning up hazardous waste sites.

Contaminant: Any hazardous substance that does not occur naturally or occurs at greater than natural background levels.

Feasibility Study: Provides identification and analysis of site cleanup alternatives and is usually completed within a year. Evaluates sufficient site information to enable the selection of a cleanup action. The entire Remedial Investigation/Feasibility Study (RI/FS) process takes about two years and is followed by the cleanup action plan.

Hazardous Site List: A list of ranked sites that require further remedial action. These sites are published in the Site Register.

Interim Action: Any remedial action that partially addresses the cleanup of a site. It is an action that is technically necessary to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance at a facility; an action that corrects a problem that may become substantially worse or cost substantially more to address if the action is delayed; an action needed to provide for completion of a site hazard assessment, state remedial investigation/feasibility study, or design of a cleanup action.

Model Toxics Control Act: Refers to Chapter 70.105D RCW. Voters approved it in November 1988. The implementing regulation is found in Chapter 173-340 WAC.

Public Notice: At a minimum, adequate notice mailed to all persons who have made a timely request of Ecology and to persons residing in the potentially affected vicinity of the proposed action; mailed to appropriate news media; published in the local (city or county) newspaper of largest circulation; and the opportunity for interested persons to comment.

Public Participation Plan: A plan prepared under the authority of WAC 173-340-600 to encourage coordinated and effective public involvement tailored to the public's needs at a particular site.

Release: Any intentional or unintentional entry of any hazardous substance into the environment, including, but not limited to, the abandonment or disposal of containers of hazardous substances.

Remedial Action: Any action or expenditure consistent with MTCA to identify, eliminate, or minimize any threat posed by hazardous substances to human health or the environment, including any investigative and monitoring activities of any release or threatened release of a hazardous substance, and any health assessments or health effects studies conducted in order to determine the risk or potential risk to human health.

Remedial Investigation: Any remedial action that provides information on the extent and magnitude of contamination at a site. This usually takes 12 to 18 months and is followed by the feasibility study. The purpose of the Remedial Investigation/Feasibility Study is to collect and develop sufficient site information to enable the selection of a cleanup action.